



June 29, 2012

Mr. Leo Francendese  
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**Subject: Final Time Critical Removal Action Report, Revision 0  
Welch Group Environmental Palmetto  
110 Palmetto Parkway  
Belton, Anderson County, South Carolina  
EPA Contract No. EP-W-05-053  
Technical Direction Document (TDD) No. TNA-05-001-0129**

Dear Mr. Francendese:

Oneida Total Integrated Enterprises (OTIE) Superfund Technical Assessment and Response Team (START) is submitting one copy of the Final Time Critical Removal Action Report (FTCRAR) report completed for the Welch Group Environmental (WGE) Palmetto facility located in Belton, Anderson County, South Carolina.

Please contact me at (678) 355-5550 ext. 5708 if you any questions or comments regarding this report.

Sincerely,

Jerry Partap  
START Environmental Scientist

Enclosure

cc: Katrina Jones, EPA Project Officer  
Darryl Walker, EPA Project Officer  
Greg Kowalski, START Program Manager (w/o enclosure)  
START File

# **REMOVAL ACTION REPORT**

**WELCH GROUP ENVIRONMENTAL PALMETTO  
110 PALMETTO PARKWAY  
BELTON, ANDERSON COUNTY, SOUTH CAROLINA**

**Revision 0**

**Prepared for:**

U.S. ENVIRONMENTAL PROTECTION AGENCY  
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|                |   |                        |
|----------------|---|------------------------|
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# CONTENTS

| <u>Section</u>   | <u>Page</u> |
|--|-------------|
| <b>1.0 INTRODUCTION.....</b>                           | <b>1</b>    |
| <b>2.0 SITE BACKGROUND .....</b>                       | <b>2</b>    |
| 2.1 SITE DESCRIPTION .....                             | 2           |
| 2.2 PREVIOUS ACTIONS .....                             | 2           |
| 2.3 ACCESS AGREEMENT .....                             | 3           |
| <b>3.0 DESCRIPTION OF DECONTAMINATION ACTION .....</b> | <b>3</b>    |
| 3.1 REMOVAL ACTION WORKPLAN .....                      | 3           |
| 3.2 REMOVAL ACTION CONTRACTORS .....                   | 5           |
| <b>4.0 AREAS OF CONCERN .....</b>                      | <b>5</b>    |
| 4.1 SHARED PATHWAY .....                               | 5           |
| 4.2 AREA A .....                                       | 5           |
| 4.3 AREA B .....                                       | 6           |
| 4.4 AREA C .....                                       | 7           |
| 4.5 AIR MONITORING .....                               | 7           |
| <b>5.0 DISPOSAL SUMMARY .....</b>                      | <b>9</b>    |
| <b>6.0 SUMMARY AND CONCLUSIONS .....</b>               | <b>9</b>    |

## APPENDICES

### **APPENDIX A – FIGURES**

- 1 Topographical Map
- 2 Aerial Map
- 3 Areas of Decontamination Map

### **APPENDIX B – TABLES**

- 1 Summary of XRF Confirmation Data Shared Pathway
- 2 Summary of XRF Confirmation Data Area A
- 3 Summary of XRF Confirmation Data Area B
- 4 Summary of WGE XRF Data Area C
- 5 Summary of XRF Confirmation Data Area C

### **APPENDIX C – WGE FIELD DATA**

### **APPENDIX D – WGE AIR MONITORING DATA**

### **APPENDIX E – WGE DISPOSAL DOCUMENTATION**

## **APPENDIX F – EPA SITE RELATED DOCUMENTS AND POLLUTION SITUATION REPORTS**



## **1.0 INTRODUCTION**

The United States Environmental Protection Agency (USEPA) tasked the Oneida Total Integrated Enterprises (OTIE) Superfund Technical Assessment and Response Team (START) to prepare the Final Time Removal Action Report (FTCRAR) for Welch Group Environmental (WGE). The FTCRAR documents the removal and decontamination activities performed by WGE at the Palmetto Parkway Superfund Site (PPSS). The PPSS is a Time Critical Removal Action (TCRA) that required remediation of a leased warehouse storage facility used by WGE for storing recovered lead slugs and shell casings from gun/rifle ranges. The TCRA was performed in accordance with the Administrative Order of Consent (AOC), Docket number CERCLA-04-2011-3763, executed on May 12, 2011. The AOC was implemented under the direction of the USEPA. WGE is the potentially responsible party (PRP) and the funding respondent who performed the PPSS TCRA. The decontamination activities began in February 2011 and concluded in November 2011.

This FTCRAR was developed by WGE to document that the PPSS TCRA was completed in accordance with the WGE Statement of Work (SOW), the AOC, the Health and Safety Plan (HASP) and the Remedial Action Work Plan (RAWP). The RAWP includes the following:

- Summary of site background conditions, previous actions and the selected remedy;
- Chronology of events describing significant activities at the site;
- Demonstration that remedial activities were completed consistent with performance standards;

The EPA tasked START to monitor WGE site removal activities and conduct field verification of the warehouse space decontamination. The activities were conducted under Contract Number (No.) EP-W-05-053, Technical Direction Document (TDD) No. TNA-05-001-0129. In addition the EPA On-Scene Coordinator (OSC) tasked START with preparing the FTCRAR on behalf of WGE.

This report describes the existing conditions at the site, the decontamination activities performed by WGE and the confirmation activities conducted by START. The data presented in this report was collected and submitted to OTIE by WGE.

The following sections provide the details of this FTCRAR:

- Section 2 – Describes the site, previous investigations and access agreement;
- Section 3 – Describes the decontamination actions;
- Section 4 – Describes the areas of concern;
- Section 5 – Describes the disposal activities; and,
- Section 6 – Provides the summary and conclusion

Figures and tables are provided as Appendices A and B, respectively. WGE field data is provided as Appendix C and WGE air monitoring data is presented as Appendix D. WGE waste disposal documentation is provided as Appendix E.

## **2.0 SITE BACKGROUND**

This section discusses the site characteristics, previous investigations and site access.

### **2.1 SITE DESCRIPTION**

The site is located at 110 Palmetto Parkway in Belton, Anderson County, South Carolina. The geographic coordinates for the center of the property are Latitude 34.5228881 degrees North and Longitude 82.4942948 degrees West (see Appendix A, Figure1). The site is comprised of a one-story warehouse building which WGE used to store recovered lead slugs and shell casings from gun/rifle ranges. Several different clients lease space within the multi-use warehouse, but the building is not partitioned into individual units. Residential properties are located to the east, west and south of the warehouse building. A large one-story warehouse building borders the site to the north (Appendix A, Figure 2).

### **2.2 PREVIOUS ACTIONS**

On February 7, 2011, the EPA and WGE conducted a site walk. During the site walk WGE indicated that a box of range recovered material had overturned and during cleanup a metal shovel was used to recover the spilled material. During recovery the metal shovel against the concrete floor created a spark from the

residual gun powder (green powder) from the spent casings thereby creating a fire that left partially burnt insulation and roofing material.

On February 10, 2011, emergency response removal procedures were initiated at the direction of the EPA. The PRP hired a contractor to perform emergency response actions. A HASP and a RAWP were submitted and approved by the OSC on February 14, 2011 in consultation with the South Carolina Department of Health and Environmental Control (SCDHEC). On February 17, 2011, the WGE contractor was on site to cover the concrete flooring in designated areas with industrial paper to prepare for remediation activities. Safety barricades were installed to delineate the exclusion zone (the area where WGE stored the range recovered materials) to prevent non response-related personnel from entering. The emergency response work was completed on February 21, 2011.

### **2.3 ACCESS AGREEMENT**

Prior to the removal and decontamination activities, the EPA obtained an access agreement from the property owner (Mr. Cummings Gary) in order to perform the TCRA work. The access agreement was signed by Mr. Gary on February 7, 2011.

## **3.0 DESCRIPTION OF DECONTAMINATION ACTION**

As required by EPA, a RAWP and HASP were developed and approved on February 14, 2011. The RAWP provided procedures and schedules for effective administration and implementation of the TCRA.

### **3.1 REMOVAL ACTION WORKPLAN**

A summary of the RAWP includes methods and procedures for decontamination using wet and dry methods; procedures for testing decontaminated areas and equipment; disposal methods for contaminated support equipment and materials used during decontamination activities; and lists personal protective equipment to be used. WGE has agreed with SCDHEC and the EPA to remediate the warehouse as follows:

- Lead – 400 parts per million (ppm)

Listed below is a summary of the remedial actions for the facility:

- Institutional controls consisting of access restrictions to prevent access to the general public;
- Designated site boundaries, designated work zones, and points of entry and exit;
- Use of barrier paper to cover contaminated areas to allow use by shared users of the warehouse space;
- Handheld wire brushes with stainless steel bristles used to clean areas above 400 ppm;
- 2-gallon hand-held garden sprayers. Hand-held low pressure sprayers used to apply tri-sodium phosphate (TSP) and water mixture to contaminated areas;
- Concrete floor grinder with a vacuum and an attached High-Efficiency Particulate Air (HEPA) filter. The gas powered concrete grinder consists of three sets of grinding blades attached to a HEPA vacuum to contain contaminated concrete dust produced by the floor grinding;
- Wet/Dry Shop vacuum with HEPA filter: a RIGID brand 12-gallon 5-horse power vacuum with HEPA filter used to vacuum any dust left behind from the floor grinder and any chemical mixtures used in the decontamination process;
- Standard IRWIN brand 100 foot chalk line used to grid out floor to verify decontamination;
- HEPA-AIRE Model H2000L Negative Air Machine: Aircraft grade aluminum two speed negative air machine, used to contain any dust in the air in the contained area;
- ESCA Tech Inc., D-Wipe disposable towels with a pH balanced cleaner to remove lead, heavy metal dusts, dirt, greases and oils;
- Gillian BDX II Air Sampler: A standard air monitoring pump used to monitor air for contaminants; Gillian Gillibrator 2 Calibration System: A high accuracy, electronic flow meter that provides instantaneous air flow readings and cumulative averaging of multiple samples used to calibrate the BDX II air sampler;
- Thermo NITON XLt, X-Ray Fluorescence instrument (XRF) will be used to verify effectiveness of decontamination activities;
- WGE used a 2 feet (ft) by 2 ft grid and take one reading using the XRF to confirm the decontamination effectiveness;
- WGE maintained all site cleanup records including maps, XRF readings and disposal documentation.

### **3.2 REMOVAL ACTION CONTRACTORS**

WGE solicited bids to perform the TCRA work in February 2011. The general contractor bid was awarded to Phillips Recoveries, Inc. of Pelzer, South Carolina. Phillips Recoveries performed work for WGE for approximately eleven days.

A.C.T. Services of Lawrenceville, Georgia was retained until WGE personnel acquired 40 HAZWOPER training for their personnel. A.C.T Services activities were terminated on June 12, 2011. WGE continued with cleanup activities after June 12, 2011.

## **4.0 AREAS OF CONCERN**

In order to systematically decon the affected sections of the warehouse, WGE divided the areas in to four areas of concern: the Shared Pathway, Area A, Area B and Area C. Figure 3 illustrates the areas of decontamination.

### **4.1 SHARED PATHWAY**

In February 2011, WGE personnel began decontamination of the Shared Pathway area (See Figure 3). The shared pathway area was mopped with a TSP solution and scrubbed with wire brushes. WGE used two-foot by two-foot grids with corresponding numbers and letter nomenclature to screen the warehouse floor. On March 1, 2011, XRF testing of the area indicated grids above 400 ppm. TSP was re-administered and XRF verification still indicated areas above 400 ppm. As a result, on March 3, 2011 a Tavasco concrete grinder was used to remove the top layer of concrete in the areas with readings exceeding 400 ppm. On March 4, 2011, START completed final XRF verification of the Shared Pathway. A copy of the grid layout was provided by WGE and is included as Reference 1 and a summary of the XRF verification results is included as Table 1 in Appendix B.

### **4.2 AREA A**

On March 28, 2011, WGE began decontamination of Area A located between the bathroom and Shared Pathway (See Figure 3). Area A was mopped with a vinegar and water solution and then screened using

the XRF. WGE used two-foot by two-foot grids with corresponding numbers and letter nomenclature to screen the warehouse floor. START used the XRF to confirm the effectiveness of the decontamination activities. Any areas where lead concentrations were above 400 ppm a Tavasco grinder was used to remove the top layer and the areas were re-screened. Also any miscellaneous items (e.g. chairs, exercise equipment, filing cabinets, wood, strapping system and pallet jack) located within Area A were screened with the XRF. WGE attempted to decontaminate any items screened above 400 ppm. Items that could not be decontaminated below 400 ppm were bagged and secured for disposal. Area A was completed on March 31, 2011. A copy of the grid layout was provided by WGE and is included as Reference 2 and a copy of the XRF verification results is included as Table 2.

### **4.3 AREA B**

On April 1, 2011, WGE began decontamination of Area B (See Figure 3). Decontamination of Area B consisted of the floor, walls, ceiling insulation, steel frame and miscellaneous items located on the warehouse floor. In order to prevent further spreading of lead dust during decontamination activities Area B was sealed with plastic. A HEPA vacuum was used to filter airborne particles.

The fire that occurred in the warehouse was located in Area B and damage was confined to the warehouse insulation. WGE removed the ceiling insulation and secured it for disposal. WGE screened all items on the floor. WGE made an effort to decontaminate any items which screened above 400 ppm for lead. Items that could not be decontaminated were bagged and secured for disposal.

The walls, support beams, purlins and ceiling were wiped with the Laser LL cleaner. WGE gridded all areas and collected wipe samples for field verification. WGE supporting field data and grids are presented in Reference 3.

WGE used the Tavasco grinder on the warehouse floor and then the area was mopped with Laser LL cleaner. WGE used two-foot by two-foot grids with corresponding numbers and letter nomenclature to screen the warehouse floor. WGE screened the warehouse floor using the XRF. Any areas where lead concentrations were above 400 ppm a Tavasco grinder was used and the areas re-screened. WGE did not provide supporting XRF field data. On February 12 and February 19, 2011, START conducted

field verifications of decontamination activities using the XRF in Area B. A copy of the grid layout was provided by WGE and is included as Reference 4 and a copy of the XRF verification results is included as Table 3.

#### **4.4 AREA C**

On May 23, 2011, WGE began decontamination of Area C (See Figure 3). Decontamination of Area C consisted of the floor, walls, ceiling insulation, steel frame and miscellaneous items located on the warehouse floor. In order to prevent further spreading of lead dust during decontamination activities Area C was sealed with plastic. A HEPA vacuum was used to filter airborne particles. WGE screened all items on the floor. WGE attempted to decontaminate any items screened above 400 ppm for lead. Items that could not be decontaminated were bagged and secured for disposal.

The walls, support beams, purlins and ceiling were wiped with the Laser LL cleaner. WGE gridded all areas and collected wipe samples for field verification. WGE supporting field data for Area C is presented on Table 4.

WGE used the Tavasco grinder on the warehouse floor and then the area was mopped with Laser LL cleaner. WGE used two-foot by two-foot grids with corresponding numbers and letter nomenclature to screen the warehouse floor. WGE screened the warehouse floor using the XRF. Any areas where lead concentrations were above 400 ppm, a Tavasco grinder was used to remove the top layer of concrete and the areas re-screened. WGE supporting data is presented on Table 4. On November 2, 2011, START conducted field verifications of decontamination activities using the XRF in Area C. A copy of the grid layout was provided by WGE and is included as Reference 5 and a copy of the XRF verification results is included as Table 5.

#### **4.5 AIR MONITORING**

The Occupational Safety and Health Administration (OSHA) require worker exposure monitoring be conducted using personal air samples collected from the breathing zone of workers. The breathing zone is within a ten-inch radius of the worker's nose and mouth.

WGE conducted air monitoring to identify and quantify potential worker exposure at all PPSS work locations and to evaluate potential migration of constituents of concern (i.e., lead dust). Air monitoring sampling was used to document the effectiveness of dust suppression techniques and the level of PPE required for on-site personnel. Clean air and pollution control was achieved through the use of a HEPA negative air machine.

Personal breathing zone (PBZ) air samples were collected on 36 days where lead mitigation work was performed on site. Sampling was conducted using 37 millimeter (mm) 0.8 micrometer (um) mixed cellulose ester (MCE) sampling cassettes connected via Tygon<sup>®</sup> tubing to Gillian Low-Flow Sampler<sup>®</sup> battery-operated personal sampling pumps. The pumps were calibrated immediately prior to and after sampling on site using a Dry-Cal. A two liter per minute (L/min) target flow rate was set to ensure adequate air volume was collected over the work period. The PBZ samples were collected in the breathing zone (at the shirt collar), unless otherwise noted. Total sample volumes were calculated based on the mean of the pre- and post- sampling flow rates. All air samples were submitted to Wisconsin Occupational Health Laboratory in Madison, Wisconsin for total lead analysis in accordance with the National Institute of Occupational Safety and Health (NIOSH) method 7400.

The OSHA Permissible Exposure Limit (PEL) for lead is 50 micrograms per cubic meter of air ( $\text{ug}/\text{m}^3$ ) calculated as an 8 hour time-weighted average (TWA). A summary of the laboratory results of PBZ air sampling is presented in Appendix D. The original laboratory reports were not provided by WGE. The sampling periods for most of the air samples collected were of 4.5-hour to 10-hour duration. Eight-hour TWA exposures were extrapolated for the PBZ samples of less than 8-hour duration which represented nearly all the expected work shift exposure. Actual and extrapolated 8-hour TWA exposures measured are presented in Appendix D. The OSHA PEL for lead of  $50 \text{ ug}/\text{m}^3$  was exceeded 10 of the 36 working days monitored. Airborne lead ranged from less than  $1.5 \text{ ug}/\text{m}^3$  to  $380 \text{ ug}/\text{m}^3$ .

The employer must notify each employee in writing within 5 working days after receipt of the results of the exposure assessment. In addition, whenever the results indicate exposure at or above the PEL, the employer must include in the written notice a statement that the employee's exposure was at or above that level and a description of the corrective action taken or to be taken to reduce the exposure below the PEL. It should also be noted that WGE submitted the air samples for laboratory analysis after the decontamination activities were complete.



## **5.0 DISPOSAL SUMMARY**

On October 22, 2011, SCDHEC granted WGE approval to transport the containerized material generated from the decontamination activities. On October 25, 2011, WGE contracted HEPACO, Inc. to remove all containerized material from the Palmetto facility to the Belton facility for future disposal/recycling. A description of the waste generated is described on the transport documents which are presented in Appendix E.

## **6.0 SUMMARY AND CONCLUSIONS**

The site is located at 110 Palmetto Parkway, Belton, Anderson County, South Carolina. The WGE scope of work as approved by the EPA was to perform decontamination activities in sections of the warehouse exposed to lead associated materials.

WGE began decontamination activities in February 2011 and field activities were completed in November 2011. Decontamination of the warehouse was divided into four areas: the Shared Pathway, Area A, Area B and Area C. WGE used a Tavasco grinder and a lead cleaner to decontaminate the concrete floor, walls, insulation and items on the warehouse floor. The fire that occurred in the warehouse was located in Area B and damage was confined to the warehouse insulation. WGE removed the ceiling insulation and secured it for disposal.

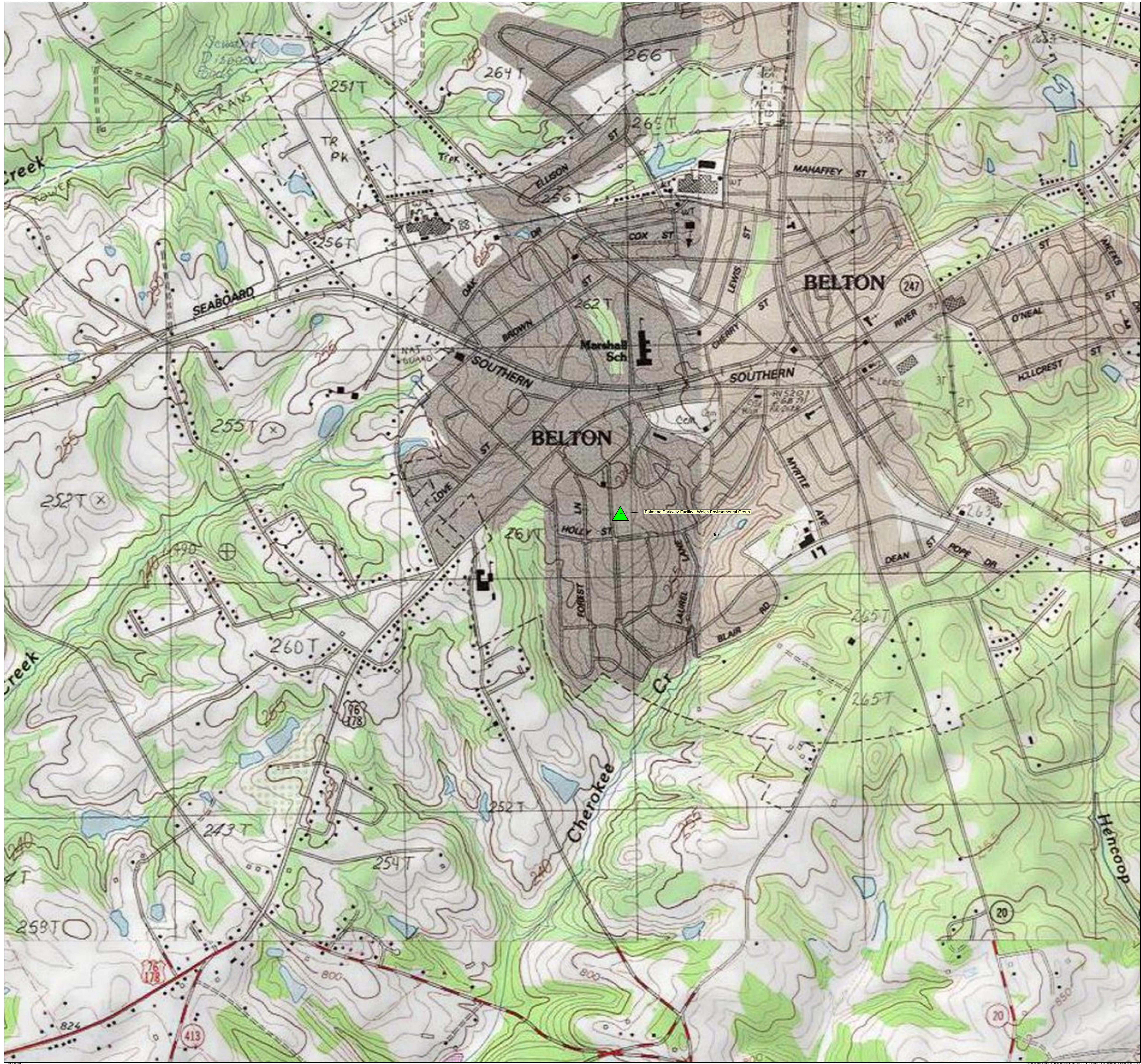
An XRF was used to screen all areas and items. WGE made an effort to decontaminate any items screened above 400 ppm. Items that could not be decontaminated were bagged and secured for disposal.

During the month of November 2011, WGE demobilized all equipment and temporary office facilities. WGE removed all containerized material from the Palmetto facility, to the Belton facility for future disposal/recycling.

All EPA site related documents and Pollution Situation Reports are presented in Appendix F.

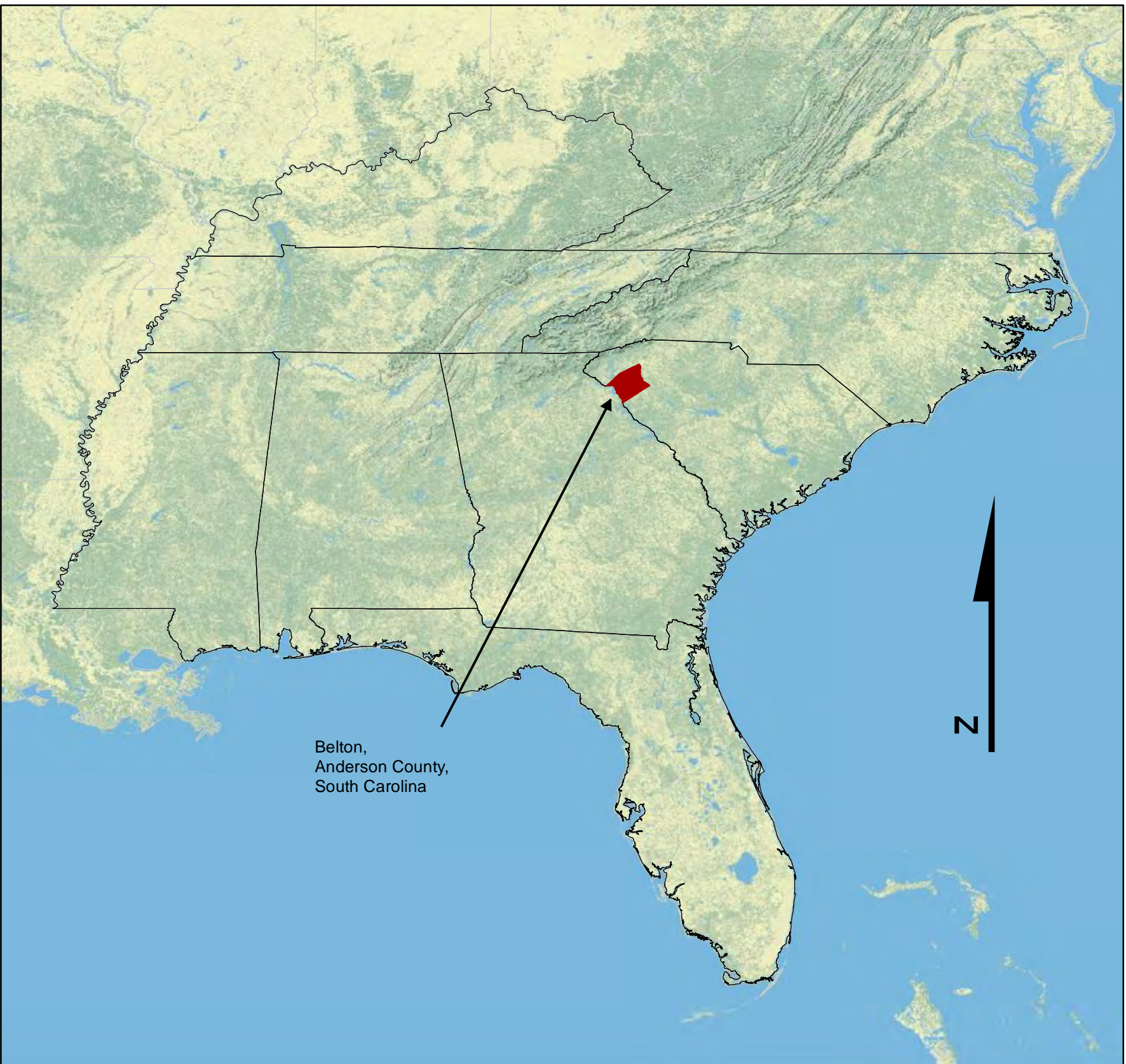
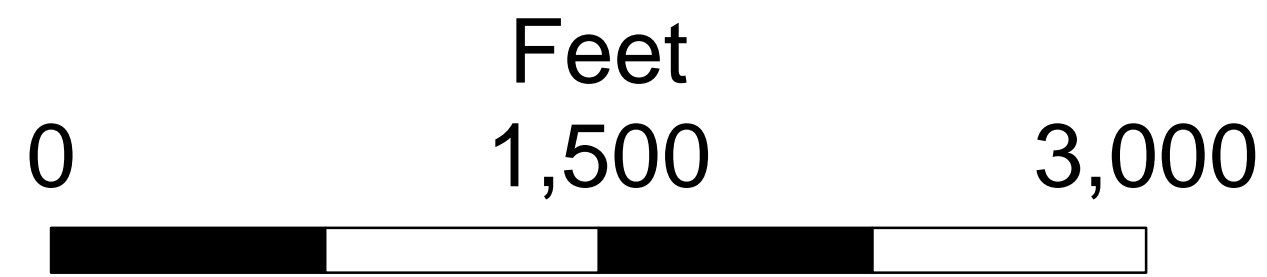
**APPENDIX A**  
**FIGURES**





# Legend

▲ Site Location



WELCH GROUP ENVIRONMENTAL  
PALMETTO PARKWAY FACILITY,  
ANDERSON COUNTY,  
SOUTH CAROLINA  
TDD NO. TNA-05-003-0122

FIGURE 1  
TOPOGRAPHICAL MAP

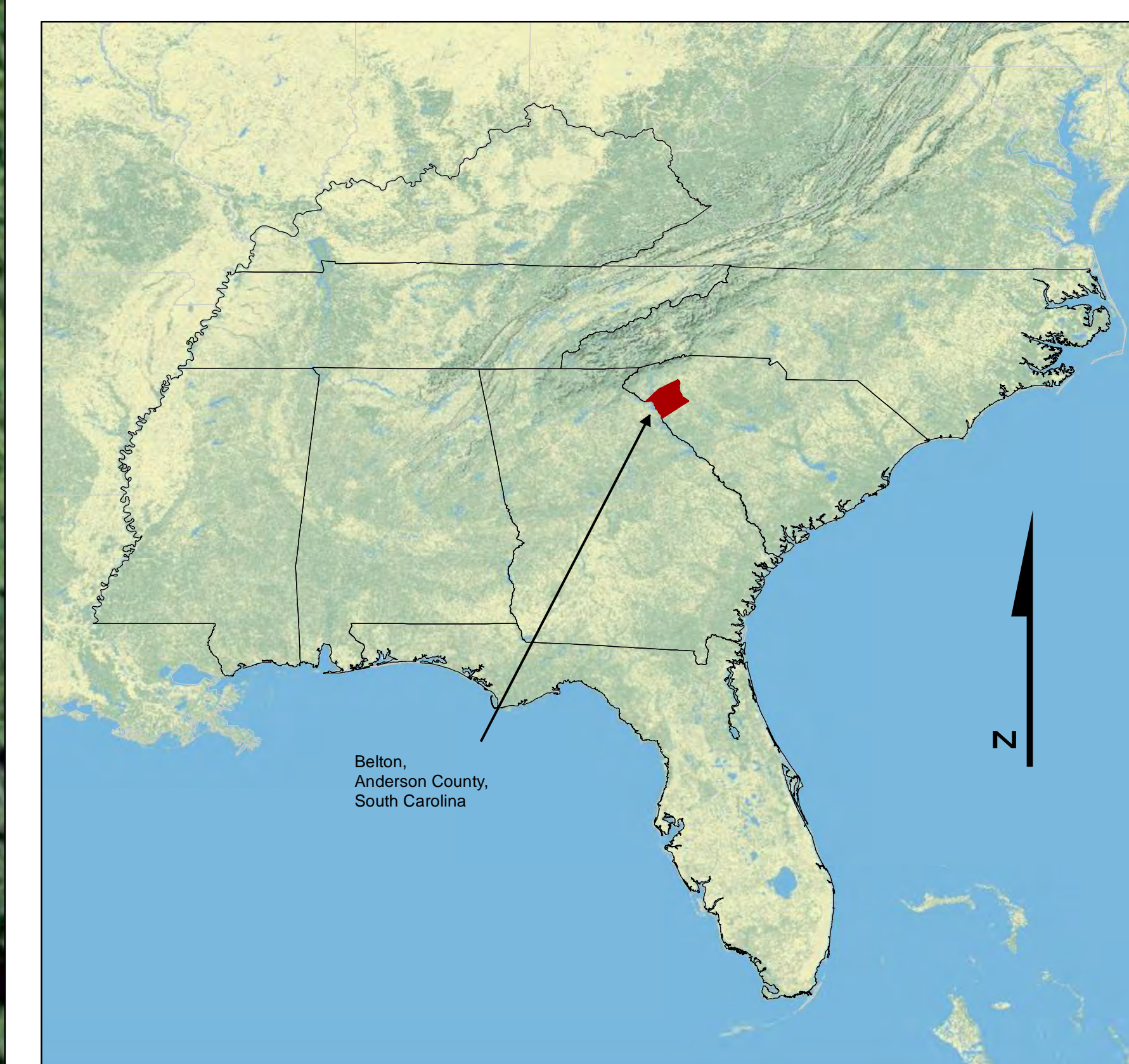


United States Environmental Protection Agency





## Legend



**WELCH GROUP ENVIRONMENTAL  
PALMETTO PARKWAY FACILITY,  
ANDERSON COUNTY,  
SOUTH CAROLINA  
TDD NO. TNA-05-003-0122**

## FIGURE 2 AERIAL MAP



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# Legend

 Area

Notes:  
All decontamination areas  
are approximate based on  
information provided by  
Welch Group Environmental

0 25 50  
Feet



**WELCH GROUP ENVIRONMENTAL  
PALMETTO PARKWAY FACILITY,  
ANDERSON COUNTY,  
SOUTH CAROLINA  
TDD NO. TNA-05-003-0122**

**FIGURE 3  
AREAS OF DECONTAMINATION MAP**



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**APPENDIX B**  
**TABLES**

**TABLE 1**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Shared Pathway**

| Location              | Date     | Sample I.D         | XRF Lead Screening Results | Units |
|-----------------------|----------|--------------------|----------------------------|-------|
| <b>Concrete Floor</b> |          |                    |                            |       |
| Shared Pathway        | 02/16/11 | Loading Dock       | 1399                       | ppm   |
| Shared Pathway        | 02/16/11 | Path #1            | 2772                       | ppm   |
| Shared Pathway        | 02/16/11 | Path #2            | 1735                       | ppm   |
| Shared Pathway        | 02/16/11 | Path #3            | 259                        | ppm   |
| Shared Pathway        | 02/16/11 | Path #4            | 909                        | ppm   |
| Shared Pathway        | 02/16/11 | Path #5            | 2108                       | ppm   |
| Shared Pathway        | 02/16/11 | Path #6            | 934                        | ppm   |
| Shared Pathway        | 02/16/11 | Doorway #1         | 461                        | ppm   |
| Shared Pathway        | 02/21/11 | Decon Loading Dock | 452                        | ppm   |
| Shared Pathway        | 02/21/11 | Decon Path #1      | 353                        | ppm   |
| Shared Pathway        | 02/21/11 | Decon Path #2      | 854                        | ppm   |
| Shared Pathway        | 02/21/11 | Decon Path #3      | 502                        | ppm   |
| Shared Pathway        | 02/21/11 | Decon Path #4      | 319                        | ppm   |
| Shared Pathway        | 02/21/11 | Decon Path #5      | 596                        | ppm   |
| Shared Pathway        | 02/21/11 | Decon Path #6      | 399                        | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #1      | 268                        | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #2      | 2240                       | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #3      | 569                        | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #4      | 499                        | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #5      | 140                        | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #6      | 1065                       | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #7      | 1982                       | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #8      | 412                        | ppm   |
| Shared Pathway        | 02/22/11 | Decon Path #9      | 255                        | ppm   |
| Shared Pathway        | 02/28/11 | A3                 | 480                        | ppm   |
| Shared Pathway        | 02/28/11 | C1                 | 442                        | ppm   |
| Shared Pathway        | 02/28/11 | C3                 | 584                        | ppm   |
| Shared Pathway        | 02/28/11 | E1                 | 522                        | ppm   |
| Shared Pathway        | 02/28/11 | E1                 | 510                        | ppm   |
| Shared Pathway        | 02/28/11 | E1                 | 1154                       | ppm   |
| Shared Pathway        | 02/28/11 | E1                 | 240                        | ppm   |
| Shared Pathway        | 03/01/11 | D3                 | 405                        | ppm   |
| Shared Pathway        | 03/01/11 | E3                 | 366                        | ppm   |
| Shared Pathway        | 03/01/11 | F3                 | 684                        | ppm   |
| Shared Pathway        | 03/01/11 | A3                 | 312                        | ppm   |
| Shared Pathway        | 03/01/11 | C3                 | 450                        | ppm   |
| Shared Pathway        | 03/01/11 | C1                 | 501                        | ppm   |
| Shared Pathway        | 03/01/11 | L16                | 595                        | ppm   |
| Shared Pathway        | 03/01/11 | L17                | 684                        | ppm   |

**TABLE 1**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Shared Pathway**

| Location       | Date     | Sample I.D | XRF Lead Screening Results | Units |
|----------------|----------|------------|----------------------------|-------|
| Shared Pathway | 03/01/11 | N3         | 430                        | ppm   |
| Shared Pathway | 03/01/11 | Q16        | 327                        | ppm   |
| Shared Pathway | 03/01/11 | R1         | 202                        | ppm   |
| Shared Pathway | 03/01/11 | R2         | 204                        | ppm   |
| Shared Pathway | 03/01/11 | R3         | 193                        | ppm   |
| Shared Pathway | 03/01/11 | S18        | 810                        | ppm   |
| Shared Pathway | 03/01/11 | T3         | 151                        | ppm   |
| Shared Pathway | 03/01/11 | U3         | 144                        | ppm   |
| Shared Pathway | 03/01/11 | V15        | 434                        | ppm   |
| Shared Pathway | 03/01/11 | W15        | 431                        | ppm   |
| Shared Pathway | 03/01/11 | Y1         | 194                        | ppm   |
| Shared Pathway | 03/01/11 | Z2         | 163                        | ppm   |
| Shared Pathway | 03/01/11 | Z15        | 423                        | ppm   |
| Shared Pathway | 03/01/11 | BB1        | 122                        | ppm   |
| Shared Pathway | 03/01/11 | CC2        | 106                        | ppm   |
| Shared Pathway | 03/02/11 | G1         | 449                        | ppm   |
| Shared Pathway | 03/02/11 | G2         | 548                        | ppm   |
| Shared Pathway | 03/02/11 | H1         | 457                        | ppm   |
| Shared Pathway | 03/02/11 | H2         | 447                        | ppm   |
| Shared Pathway | 03/02/11 | H3         | 405                        | ppm   |
| Shared Pathway | 03/02/11 | I1         | 1112                       | ppm   |
| Shared Pathway | 03/02/11 | I2         | 964                        | ppm   |
| Shared Pathway | 03/02/11 | I3         | 580                        | ppm   |
| Shared Pathway | 03/02/11 | J1         | 638                        | ppm   |
| Shared Pathway | 03/02/11 | J1         | 888                        | ppm   |
| Shared Pathway | 03/02/11 | J1         | 1072                       | ppm   |
| Shared Pathway | 03/02/11 | J1         | 760                        | ppm   |
| Shared Pathway | 03/02/11 | J1         | 601                        | ppm   |
| Shared Pathway | 03/02/11 | J1         | 955                        | ppm   |
| Shared Pathway | 03/02/11 | J1         | 709                        | ppm   |
| Shared Pathway | 03/02/11 | J16        | 293                        | ppm   |
| Shared Pathway | 03/02/11 | J17        | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | J18        | 611                        | ppm   |
| Shared Pathway | 03/02/11 | J18        | 394                        | ppm   |
| Shared Pathway | 03/02/11 | J2         | 442                        | ppm   |
| Shared Pathway | 03/02/11 | J3         | 689                        | ppm   |
| Shared Pathway | 03/02/11 | K1         | 575                        | ppm   |
| Shared Pathway | 03/02/11 | K1         | 835                        | ppm   |
| Shared Pathway | 03/02/11 | K1         | 416                        | ppm   |
| Shared Pathway | 03/02/11 | K1         | 659                        | ppm   |



**TABLE 1**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Shared Pathway**

| Location       | Date     | Sample I.D | XRF Lead Screening Results | Units |
|----------------|----------|------------|----------------------------|-------|
| Shared Pathway | 03/02/11 | K1         | 437                        | ppm   |
| Shared Pathway | 03/02/11 | K1         | 476                        | ppm   |
| Shared Pathway | 03/02/11 | K1         | 1149                       | ppm   |
| Shared Pathway | 03/02/11 | K1         | 431                        | ppm   |
| Shared Pathway | 03/02/11 | K2         | 440                        | ppm   |
| Shared Pathway | 03/02/11 | K3         | 711                        | ppm   |
| Shared Pathway | 03/02/11 | K16        | 309                        | ppm   |
| Shared Pathway | 03/02/11 | K17        | 419                        | ppm   |
| Shared Pathway | 03/02/11 | K17        | 249                        | ppm   |
| Shared Pathway | 03/02/11 | K18        | 227                        | ppm   |
| Shared Pathway | 03/02/11 | L1         | 506                        | ppm   |
| Shared Pathway | 03/02/11 | L1         | 775                        | ppm   |
| Shared Pathway | 03/02/11 | L1         | 746                        | ppm   |
| Shared Pathway | 03/02/11 | L1         | 462                        | ppm   |
| Shared Pathway | 03/02/11 | L1         | 563                        | ppm   |
| Shared Pathway | 03/02/11 | L1         | 670                        | ppm   |
| Shared Pathway | 03/02/11 | L2         | 365                        | ppm   |
| Shared Pathway | 03/02/11 | L3         | 359                        | ppm   |
| Shared Pathway | 03/02/11 | L16        | 297                        | ppm   |
| Shared Pathway | 03/02/11 | L17        | 233                        | ppm   |
| Shared Pathway | 03/02/11 | L18        | 127                        | ppm   |
| Shared Pathway | 03/02/11 | M1         | 634                        | ppm   |
| Shared Pathway | 03/02/11 | M1         | 292                        | ppm   |
| Shared Pathway | 03/02/11 | M2         | 284                        | ppm   |
| Shared Pathway | 03/02/11 | M3         | 286                        | ppm   |
| Shared Pathway | 03/02/11 | M16        | 211                        | ppm   |
| Shared Pathway | 03/02/11 | M17        | 149                        | ppm   |
| Shared Pathway | 03/02/11 | N1         | 354                        | ppm   |
| Shared Pathway | 03/02/11 | N2         | 257                        | ppm   |
| Shared Pathway | 03/02/11 | N3         | 163                        | ppm   |
| Shared Pathway | 03/02/11 | N16        | 280                        | ppm   |
| Shared Pathway | 03/02/11 | N17        | 173                        | ppm   |
| Shared Pathway | 03/02/11 | O1         | 389                        | ppm   |
| Shared Pathway | 03/02/11 | O2         | 217                        | ppm   |
| Shared Pathway | 03/02/11 | O3         | 399                        | ppm   |
| Shared Pathway | 03/02/11 | O16        | 418                        | ppm   |
| Shared Pathway | 03/02/11 | O16        | 186                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 1163                       | ppm   |
| Shared Pathway | 03/02/11 | O17        | 532                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 1067                       | ppm   |

**TABLE 1**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Shared Pathway**

| Location       | Date     | Sample I.D | XRF Lead Screening Results | Units |
|----------------|----------|------------|----------------------------|-------|
| Shared Pathway | 03/02/11 | O17        | 664                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 598                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 685                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 1151                       | ppm   |
| Shared Pathway | 03/02/11 | O17        | 516                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 613                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 726                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 987                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | 1047                       | ppm   |
| Shared Pathway | 03/02/11 | O17        | 1088                       | ppm   |
| Shared Pathway | 03/02/11 | O17        | 460                        | ppm   |
| Shared Pathway | 03/02/11 | O17        | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | P1         | 2196                       | ppm   |
| Shared Pathway | 03/02/11 | P1         | 1510                       | ppm   |
| Shared Pathway | 03/02/11 | P2         | 2066                       | ppm   |
| Shared Pathway | 03/02/11 | P2         | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | P3         | 342                        | ppm   |
| Shared Pathway | 03/02/11 | P16        | 177                        | ppm   |
| Shared Pathway | 03/02/11 | P17        | 506                        | ppm   |
| Shared Pathway | 03/02/11 | P17        | 795                        | ppm   |
| Shared Pathway | 03/02/11 | P17        | 346                        | ppm   |
| Shared Pathway | 03/02/11 | Q1         | 357                        | ppm   |
| Shared Pathway | 03/02/11 | Q2         | 200                        | ppm   |
| Shared Pathway | 03/02/11 | Q3         | 219                        | ppm   |
| Shared Pathway | 03/02/11 | Q16        | 129                        | ppm   |
| Shared Pathway | 03/02/11 | Q17        | 126                        | ppm   |
| Shared Pathway | 03/02/11 | R13        | 91                         | ppm   |
| Shared Pathway | 03/02/11 | R14        | 173                        | ppm   |
| Shared Pathway | 03/02/11 | R15        | 147                        | ppm   |
| Shared Pathway | 03/02/11 | R16        | 163                        | ppm   |
| Shared Pathway | 03/02/11 | R17        | 219                        | ppm   |
| Shared Pathway | 03/02/11 | R18        | 150                        | ppm   |
| Shared Pathway | 03/02/11 | S1         | 81                         | ppm   |
| Shared Pathway | 03/02/11 | S2         | 117                        | ppm   |
| Shared Pathway | 03/02/11 | S3         | 205                        | ppm   |
| Shared Pathway | 03/02/11 | S13        | 131                        | ppm   |
| Shared Pathway | 03/02/11 | S14        | 157                        | ppm   |
| Shared Pathway | 03/02/11 | S15        | 140                        | ppm   |
| Shared Pathway | 03/02/11 | S16        | 179                        | ppm   |
| Shared Pathway | 03/02/11 | S17        | 133                        | ppm   |

**TABLE 1**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Shared Pathway**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Shared Pathway  | 03/02/11    | S18               | 266                               | ppm          |
| Shared Pathway  | 03/02/11    | T1                | 68                                | ppm          |
| Shared Pathway  | 03/02/11    | T2                | 79                                | ppm          |
| Shared Pathway  | 03/02/11    | T11               | 108                               | ppm          |
| Shared Pathway  | 03/02/11    | T12               | 160                               | ppm          |
| Shared Pathway  | 03/02/11    | T13               | 192                               | ppm          |
| Shared Pathway  | 03/02/11    | T14               | 267                               | ppm          |
| Shared Pathway  | 03/02/11    | T15               | 242                               | ppm          |
| Shared Pathway  | 03/02/11    | U1                | < LOD                             | ppm          |
| Shared Pathway  | 03/02/11    | U2                | 90                                | ppm          |
| Shared Pathway  | 03/02/11    | U11               | < LOD                             | ppm          |
| Shared Pathway  | 03/02/11    | U12               | 89                                | ppm          |
| Shared Pathway  | 03/02/11    | U13               | 250                               | ppm          |
| Shared Pathway  | 03/02/11    | U14               | 248                               | ppm          |
| Shared Pathway  | 03/02/11    | U15               | 151                               | ppm          |
| Shared Pathway  | 03/02/11    | V1                | 212                               | ppm          |
| Shared Pathway  | 03/02/11    | V2                | 302                               | ppm          |
| Shared Pathway  | 03/02/11    | V3                | 146                               | ppm          |
| Shared Pathway  | 03/02/11    | V11               | 105                               | ppm          |
| Shared Pathway  | 03/02/11    | V12               | 158                               | ppm          |
| Shared Pathway  | 03/02/11    | V13               | 133                               | ppm          |
| Shared Pathway  | 03/02/11    | V14               | 98                                | ppm          |
| Shared Pathway  | 03/02/11    | V15               | 102                               | ppm          |
| Shared Pathway  | 03/02/11    | W1                | 83                                | ppm          |
| Shared Pathway  | 03/02/11    | W2                | 93                                | ppm          |
| Shared Pathway  | 03/02/11    | W3                | 131                               | ppm          |
| Shared Pathway  | 03/02/11    | W11               | 73                                | ppm          |
| Shared Pathway  | 03/02/11    | W12               | 165                               | ppm          |
| Shared Pathway  | 03/02/11    | W12               | 209                               | ppm          |
| Shared Pathway  | 03/02/11    | W13               | 77                                | ppm          |
| Shared Pathway  | 03/02/11    | W14               | 123                               | ppm          |
| Shared Pathway  | 03/02/11    | W15               | < LOD                             | ppm          |
| Shared Pathway  | 03/02/11    | X1                | 276                               | ppm          |
| Shared Pathway  | 03/02/11    | X2                | 166                               | ppm          |
| Shared Pathway  | 03/02/11    | X3                | 88                                | ppm          |
| Shared Pathway  | 03/02/11    | X11               | 101                               | ppm          |
| Shared Pathway  | 03/02/11    | X12               | 119                               | ppm          |
| Shared Pathway  | 03/02/11    | X13               | 171                               | ppm          |
| Shared Pathway  | 03/02/11    | X14               | 187                               | ppm          |
| Shared Pathway  | 03/02/11    | X15               | 146                               | ppm          |

**TABLE 1**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Shared Pathway**

| Location       | Date     | Sample I.D | XRF Lead Screening Results | Units |
|----------------|----------|------------|----------------------------|-------|
| Shared Pathway | 03/02/11 | Y2         | 75                         | ppm   |
| Shared Pathway | 03/02/11 | Y3         | 73                         | ppm   |
| Shared Pathway | 03/02/11 | Y11        | 401                        | ppm   |
| Shared Pathway | 03/02/11 | Y11        | 147                        | ppm   |
| Shared Pathway | 03/02/11 | Y12        | 300                        | ppm   |
| Shared Pathway | 03/02/11 | Y13        | 293                        | ppm   |
| Shared Pathway | 03/02/11 | Y14        | 197                        | ppm   |
| Shared Pathway | 03/02/11 | Y15        | 204                        | ppm   |
| Shared Pathway | 03/02/11 | Z1         | 118                        | ppm   |
| Shared Pathway | 03/02/11 | Z3         | 388                        | ppm   |
| Shared Pathway | 03/02/11 | Z4         | 143                        | ppm   |
| Shared Pathway | 03/02/11 | Z5         | 73                         | ppm   |
| Shared Pathway | 03/02/11 | Z6         | 71                         | ppm   |
| Shared Pathway | 03/02/11 | Z7         | 89                         | ppm   |
| Shared Pathway | 03/02/11 | Z8         | 89                         | ppm   |
| Shared Pathway | 03/02/11 | Z9         | 67                         | ppm   |
| Shared Pathway | 03/02/11 | Z10        | 137                        | ppm   |
| Shared Pathway | 03/02/11 | Z11        | 74                         | ppm   |
| Shared Pathway | 03/02/11 | Z12        | 167                        | ppm   |
| Shared Pathway | 03/02/11 | Z13        | 95                         | ppm   |
| Shared Pathway | 03/02/11 | Z14        | 193                        | ppm   |
| Shared Pathway | 03/02/11 | Z15        | 163                        | ppm   |
| Shared Pathway | 03/02/11 | Z16        | 169                        | ppm   |
| Shared Pathway | 03/02/11 | Z17        | 229                        | ppm   |
| Shared Pathway | 03/02/11 | Z18        | 172                        | ppm   |
| Shared Pathway | 03/02/11 | Z19        | 214                        | ppm   |
| Shared Pathway | 03/02/11 | AA1        | 147                        | ppm   |
| Shared Pathway | 03/02/11 | AA2        | 276                        | ppm   |
| Shared Pathway | 03/02/11 | AA3        | 202                        | ppm   |
| Shared Pathway | 03/02/11 | AA5        | 117                        | ppm   |
| Shared Pathway | 03/02/11 | AA6        | 144                        | ppm   |
| Shared Pathway | 03/02/11 | AA7        | 77                         | ppm   |
| Shared Pathway | 03/02/11 | AA8        | 180                        | ppm   |
| Shared Pathway | 03/02/11 | AA9        | 103                        | ppm   |
| Shared Pathway | 03/02/11 | AA10       | 109                        | ppm   |
| Shared Pathway | 03/02/11 | AA11       | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | AA12       | 129                        | ppm   |
| Shared Pathway | 03/02/11 | AA13       | 141                        | ppm   |
| Shared Pathway | 03/02/11 | AA14       | 130                        | ppm   |
| Shared Pathway | 03/02/11 | AA15       | 159                        | ppm   |

**TABLE 1**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Shared Pathway**

| Location       | Date     | Sample I.D | XRF Lead Screening Results | Units |
|----------------|----------|------------|----------------------------|-------|
| Shared Pathway | 03/02/11 | AA16       | 76                         | ppm   |
| Shared Pathway | 03/02/11 | AA17       | 78                         | ppm   |
| Shared Pathway | 03/02/11 | AA18       | 200                        | ppm   |
| Shared Pathway | 03/02/11 | AA19       | 146                        | ppm   |
| Shared Pathway | 03/02/11 | BB2        | 178                        | ppm   |
| Shared Pathway | 03/02/11 | BB3        | 179                        | ppm   |
| Shared Pathway | 03/02/11 | BB4        | 112                        | ppm   |
| Shared Pathway | 03/02/11 | BB5        | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | BB6        | 84                         | ppm   |
| Shared Pathway | 03/02/11 | BB7        | 76                         | ppm   |
| Shared Pathway | 03/02/11 | BB8        | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | BB9        | 94                         | ppm   |
| Shared Pathway | 03/02/11 | BB10       | 98                         | ppm   |
| Shared Pathway | 03/02/11 | BB11       | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | BB12       | 249                        | ppm   |
| Shared Pathway | 03/02/11 | BB13       | 93                         | ppm   |
| Shared Pathway | 03/02/11 | BB14       | 100                        | ppm   |
| Shared Pathway | 03/02/11 | BB15       | 85                         | ppm   |
| Shared Pathway | 03/02/11 | BB16       | 153                        | ppm   |
| Shared Pathway | 03/02/11 | BB17       | 196                        | ppm   |
| Shared Pathway | 03/02/11 | BB18       | 221                        | ppm   |
| Shared Pathway | 03/02/11 | BB19       | 3581                       | ppm   |
| Shared Pathway | 03/02/11 | BB19       | 1306                       | ppm   |
| Shared Pathway | 03/02/11 | BB19       | 146                        | ppm   |
| Shared Pathway | 03/02/11 | CC1        | 173                        | ppm   |
| Shared Pathway | 03/02/11 | CC3        | 168                        | ppm   |
| Shared Pathway | 03/02/11 | CC4        | 92                         | ppm   |
| Shared Pathway | 03/02/11 | CC5        | 114                        | ppm   |
| Shared Pathway | 03/02/11 | CC1        | 488                        | ppm   |
| Shared Pathway | 03/02/11 | CC6        | 333                        | ppm   |
| Shared Pathway | 03/02/11 | CC7        | 196                        | ppm   |
| Shared Pathway | 03/02/11 | CC8        | 111                        | ppm   |
| Shared Pathway | 03/02/11 | CC9        | 195                        | ppm   |
| Shared Pathway | 03/02/11 | CC10       | 142                        | ppm   |
| Shared Pathway | 03/02/11 | CC11       | 237                        | ppm   |
| Shared Pathway | 03/02/11 | CC12       | 179                        | ppm   |
| Shared Pathway | 03/02/11 | CC13       | 147                        | ppm   |
| Shared Pathway | 03/02/11 | CC14       | 78                         | ppm   |
| Shared Pathway | 03/02/11 | CC15       | 121                        | ppm   |
| Shared Pathway | 03/02/11 | CC16       | 246                        | ppm   |

**TABLE 1**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Shared Pathway**

| Location       | Date     | Sample I.D | XRF Lead Screening Results | Units |
|----------------|----------|------------|----------------------------|-------|
| Shared Pathway | 03/02/11 | CC17       | 232                        | ppm   |
| Shared Pathway | 03/02/11 | CC18       | 291                        | ppm   |
| Shared Pathway | 03/02/11 | CC19       | 271                        | ppm   |
| Shared Pathway | 03/02/11 | DD1        | 248                        | ppm   |
| Shared Pathway | 03/02/11 | DD2        | 280                        | ppm   |
| Shared Pathway | 03/02/11 | DD3        | 303                        | ppm   |
| Shared Pathway | 03/02/11 | DD4        | 108                        | ppm   |
| Shared Pathway | 03/02/11 | DD5        | 136                        | ppm   |
| Shared Pathway | 03/02/11 | DD5        | 162                        | ppm   |
| Shared Pathway | 03/02/11 | DD6        | 117                        | ppm   |
| Shared Pathway | 03/02/11 | DD7        | 212                        | ppm   |
| Shared Pathway | 03/02/11 | DD6        | 242                        | ppm   |
| Shared Pathway | 03/02/11 | DD7        | 227                        | ppm   |
| Shared Pathway | 03/02/11 | DD8        | 195                        | ppm   |
| Shared Pathway | 03/02/11 | DD9        | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | DD10       | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | DD11       | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | DD12       | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | DD13       | 103                        | ppm   |
| Shared Pathway | 03/02/11 | DD14       | 86                         | ppm   |
| Shared Pathway | 03/02/11 | DD15       | 212                        | ppm   |
| Shared Pathway | 03/02/11 | DD16       | < LOD                      | ppm   |
| Shared Pathway | 03/02/11 | DD17       | 171                        | ppm   |
| Shared Pathway | 03/02/11 | DD18       | 189                        | ppm   |
| Shared Pathway | 03/02/11 | DD19       | 167                        | ppm   |

Notes:

- 1) XRF - X-Ray Fluorescence
- 2) I.D - Identification
- 3) ppm - parts per million

**TABLE 2**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area A**

| Location              | Date     | Sample I.D | XRF Lead Screening Results | Units |
|-----------------------|----------|------------|----------------------------|-------|
| <b>Concrete Floor</b> |          |            |                            |       |
| Area A                | 03/04/11 | A1         | < LOD                      | ppm   |
| Area A                | 03/04/11 | A2         | < LOD                      | ppm   |
| Area A                | 03/04/11 | B1         | < LOD                      | ppm   |
| Area A                | 03/04/11 | B2         | < LOD                      | ppm   |
| Area A                | 03/04/11 | B3         | < LOD                      | ppm   |
| Area A                | 03/04/11 | C1         | < LOD                      | ppm   |
| Area A                | 03/04/11 | C2         | 94                         | ppm   |
| Area A                | 03/04/11 | C3         | < LOD                      | ppm   |
| Area A                | 03/04/11 | D1         | 89                         | ppm   |
| Area A                | 03/04/11 | D2         | 89                         | ppm   |
| Area A                | 03/04/11 | D3         | < LOD                      | ppm   |
| Area A                | 03/04/11 | E2         | 163                        | ppm   |
| Area A                | 03/04/11 | E3         | 337                        | ppm   |
| Area A                | 03/04/11 | F1         | 74                         | ppm   |
| Area A                | 03/04/11 | F2         | 79                         | ppm   |
| Area A                | 03/04/11 | F3         | 91                         | ppm   |
| Area A                | 03/04/11 | G1         | 77                         | ppm   |
| Area A                | 03/04/11 | G2         | 160                        | ppm   |
| Area A                | 03/04/11 | G3         | 72                         | ppm   |
| Area A                | 03/04/11 | H1         | 195                        | ppm   |
| Area A                | 03/04/11 | H2         | 491                        | ppm   |
| Area A                | 03/04/11 | H2         | 73                         | ppm   |
| Area A                | 03/04/11 | H3         | 66                         | ppm   |
| Area A                | 03/04/11 | I1         | 178                        | ppm   |
| Area A                | 03/04/11 | I2         | 441                        | ppm   |
| Area A                | 03/04/11 | I2         | 258                        | ppm   |
| Area A                | 03/04/11 | I3         | 153                        | ppm   |
| Area A                | 03/04/11 | J1         | 176                        | ppm   |
| Area A                | 03/04/11 | J2         | 252                        | ppm   |
| Area A                | 03/04/11 | J3         | 231                        | ppm   |
| Area A                | 03/04/11 | K1         | < LOD                      | ppm   |
| Area A                | 03/04/11 | K2         | 66                         | ppm   |
| Area A                | 03/04/11 | K3         | 453                        | ppm   |
| Area A                | 03/04/11 | K3         | 390                        | ppm   |
| Area A                | 03/04/11 | L1         | 82                         | ppm   |
| Area A                | 03/04/11 | M2         | < LOD                      | ppm   |
| Area A                | 03/04/11 | N2         | 87                         | ppm   |
| Area A                | 03/04/11 | O3         | < LOD                      | ppm   |
| Area A                | 03/04/11 | O17        | 1019                       | ppm   |

**TABLE 2**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area A**

| Location | Date     | Sample I.D | XRF Lead Screening Results | Units |
|----------|----------|------------|----------------------------|-------|
| Area A   | 03/04/11 | O17        | 937                        | ppm   |
| Area A   | 03/04/11 | O17        | 685                        | ppm   |
| Area A   | 03/04/11 | O17        | 647                        | ppm   |
| Area A   | 03/04/11 | O17        | 621                        | ppm   |
| Area A   | 03/04/11 | O17        | 568                        | ppm   |
| Area A   | 03/04/11 | O17        | 545                        | ppm   |
| Area A   | 03/04/11 | O17        | 485                        | ppm   |
| Area A   | 03/04/11 | O17        | 366                        | ppm   |
| Area A   | 03/04/11 | P1         | 1555                       | ppm   |
| Area A   | 03/04/11 | P1         | < LOD                      | ppm   |
| Area A   | 03/04/11 | P2         | < LOD                      | ppm   |
| Area A   | 03/31/11 | K9         | 229                        | ppm   |
| Area A   | 03/31/11 | O9         | 107                        | ppm   |
| Area A   | 03/31/11 | O8         | 162                        | ppm   |
| Area A   | 03/31/11 | P7         | 126                        | ppm   |
| Area A   | 03/31/11 | I10        | 408                        | ppm   |
| Area A   | 03/31/11 | G2         | 414                        | ppm   |
| Area A   | 03/31/11 | H2         | 273                        | ppm   |
| Area A   | 03/31/11 | M2         | 178                        | ppm   |
| Area A   | 03/31/11 | D2         | 371                        | ppm   |
| Area A   | 03/31/11 | F4         | 321                        | ppm   |
| Area A   | 03/31/11 | H5         | 367                        | ppm   |
| Area A   | 03/31/11 | M7         | 252                        | ppm   |
| Area A   | 03/31/11 | L6         | 185                        | ppm   |



**TABLE 2**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area A**

| Location                   | Date     | Sample I.D         | XRF Lead Screening Results | Units |
|----------------------------|----------|--------------------|----------------------------|-------|
| <b>Miscellaneous Items</b> |          |                    |                            |       |
| Area A                     | 02/16/11 | Box -1             | 60                         | ppm   |
| Area A                     | 02/16/11 | Box -2             | < LOD                      | ppm   |
| Area A                     | 02/16/11 | Box -3             | 55                         | ppm   |
| Area A                     | 02/16/11 | Box -4             | < LOD                      | ppm   |
| Area A                     | 02/16/11 | Box -5             | 101                        | ppm   |
| Area A                     | 02/16/11 | Box -6             | < LOD                      | ppm   |
| Area A                     | 02/16/11 | Steebox            | 139                        | ppm   |
| Area A                     | 02/16/11 | Box                | < LOD                      | ppm   |
| Area A                     | 03/02/11 | Wood               | < LOD                      | ppm   |
| Area A                     | 03/02/11 | Chair              | 12354                      | ppm   |
| Area A                     | 03/02/11 | Cloth              | 442                        | ppm   |
| Area A                     | 03/02/11 | Wrestling Mat      | 2666                       | ppm   |
| Area A                     | 03/02/11 | Carpet             | 9145                       | ppm   |
| Area A                     | 03/04/11 | Conveyor           | 14833                      | ppm   |
| Area A                     | 03/04/11 | Conveyor           | 9457                       | ppm   |
| Area A                     | 03/30/11 | Weight Rack 1      | < LOD                      | ppm   |
| Area A                     | 03/30/11 | Weight Rack 2      | < LOD                      | ppm   |
| Area A                     | 03/30/11 | Weight Bench       | 26                         | ppm   |
| Area A                     | 03/30/11 | Scale              | 961                        | ppm   |
| Area A                     | 03/30/11 | Weight Rack #2 -1  | 298                        | ppm   |
| Area A                     | 03/30/11 | Weight Rack #2 -2  | 310                        | ppm   |
| Area A                     | 03/30/11 | Ski Machine        | < LOD                      | ppm   |
| Area A                     | 03/30/11 | Stationery Bike    | 26                         | ppm   |
| Area A                     | 03/30/11 | Corner of Floor #1 | 74                         | ppm   |
| Area A                     | 03/30/11 | Corner of Floor #2 | 636                        | ppm   |
| Area A                     | 03/30/11 | Corner of Floor #3 | 504                        | ppm   |
| Area A                     | 03/30/11 | Strapping System   | 659                        | ppm   |
| Area A                     | 03/30/11 | Pallet Jack        | 1392                       | ppm   |

Notes:

- 1) XRF - X-Ray Fluoresence
- 2) I.D - Identification
- 3) ppm - parts per million
- 4) LOD - Level of Detection

**TABLE 3**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area B**

| Location              | Date     | Sample I.D | XRF Lead Screening Results | Units |
|-----------------------|----------|------------|----------------------------|-------|
| <b>Concrete Floor</b> |          |            |                            |       |
| Area B                | 05/12/11 | C17        | 205                        | ppm   |
| Area B                | 05/12/11 | B17        | 165                        | ppm   |
| Area B                | 05/12/11 | C20        | 143                        | ppm   |
| Area B                | 05/12/11 | C22        | 138                        | ppm   |
| Area B                | 05/12/11 | B20        | 209                        | ppm   |
| Area B                | 05/12/11 | B22        | 187                        | ppm   |
| Area B                | 05/12/11 | C14        | 184                        | ppm   |
| Area B                | 05/12/11 | B14        | 166                        | ppm   |
| Area B                | 05/12/11 | C11        | 191                        | ppm   |
| Area B                | 05/12/11 | C8         | 210                        | ppm   |
| Area B                | 05/12/11 | C4         | 310                        | ppm   |
| Area B                | 05/12/11 | C1         | 465                        | ppm   |
| Area B                | 05/12/11 | E3         | 714                        | ppm   |
| Area B                | 05/12/11 | E6         | 374                        | ppm   |
| Area B                | 05/12/11 | E9         | 293                        | ppm   |
| Area B                | 05/12/11 | E12        | 301                        | ppm   |
| Area B                | 05/12/11 | E15        | 215                        | ppm   |
| Area B                | 05/12/11 | E18        | 245                        | ppm   |
| Area B                | 05/12/11 | E21        | 176                        | ppm   |
| Area B                | 05/12/11 | E23        | 190                        | ppm   |
| Area B                | 05/12/11 | G23        | 197                        | ppm   |
| Area B                | 05/12/11 | G20        | 163                        | ppm   |
| Area B                | 05/12/11 | G16        | 112                        | ppm   |
| Area B                | 05/12/11 | G13        | 186                        | ppm   |
| Area B                | 05/12/11 | G10        | 863                        | ppm   |
| Area B                | 05/12/11 | G11        | 268                        | ppm   |
| Area B                | 05/12/11 | G9         | 293                        | ppm   |
| Area B                | 05/12/11 | G6         | 359                        | ppm   |
| Area B                | 05/12/11 | G4         | 276                        | ppm   |
| Area B                | 05/12/11 | J5         | 259                        | ppm   |
| Area B                | 05/12/11 | J8         | 239                        | ppm   |
| Area B                | 05/12/11 | J12        | 357                        | ppm   |
| Area B                | 05/12/11 | J13        | 401                        | ppm   |
| Area B                | 05/12/11 | J14        | 155                        | ppm   |
| Area B                | 05/12/11 | J17        | 209                        | ppm   |
| Area B                | 05/12/11 | J20        | 157                        | ppm   |
| Area B                | 05/12/11 | K23        | 241                        | ppm   |
| Area B                | 05/12/11 | M22        | 202                        | ppm   |
| Area B                | 05/12/11 | M18        | 213                        | ppm   |

**TABLE 3**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area B**

| Location        | Date     | Sample I.D                | XRF Lead Screening Results | Units |
|-----------------|----------|---------------------------|----------------------------|-------|
| Area B          | 05/12/11 | M16                       | 163                        | ppm   |
| Area B          | 05/12/11 | M13                       | 314                        | ppm   |
| Area B          | 05/12/11 | L10                       | 310                        | ppm   |
| Area B          | 05/12/11 | N5                        | 183                        | ppm   |
| Area B          | 05/12/11 | N2                        | 134                        | ppm   |
| Area B          | 05/12/11 | O1                        | 153                        | ppm   |
| Area B          | 05/19/11 | C1                        | 308                        | ppm   |
| Area B          | 05/19/11 | E6                        | 285                        | ppm   |
| Area B          | 05/19/11 | G10                       | 168                        | ppm   |
| Area B          | 05/19/11 | G6                        | 233                        | ppm   |
| Area B          | 05/19/11 | J12                       | 262                        | ppm   |
| Area B          | 05/19/11 | J13                       | 505                        | ppm   |
| Area B          | 05/19/11 | L10                       | 161                        | ppm   |
| Area B          | 05/19/11 | N2                        | 207                        | ppm   |
| Area B          | 05/19/11 | N5                        | 138                        | ppm   |
| Area B          | 05/19/11 | O1                        | 137                        | ppm   |
| Area B          | 05/19/11 | O6                        | 131                        | ppm   |
| Area B          | 05/19/11 | O11                       | 162                        | ppm   |
| Area B          | 05/19/11 | O13                       | 182                        | ppm   |
| Area B          | 05/19/11 | P2                        | 177                        | ppm   |
| Area B          | 05/19/11 | P3                        | 226                        | ppm   |
| Area B          | 05/19/11 | P4                        | 301                        | ppm   |
| Area B          | 05/19/11 | P5                        | 233                        | ppm   |
| Area B          | 05/19/11 | P11                       | 180                        | ppm   |
| Area B          | 05/19/11 | P12                       | 368                        | ppm   |
| Area B          | 05/19/11 | P13                       | 331                        | ppm   |
| Area B          | 05/19/11 | C1                        | 2060                       | ppm   |
| Area B          | 05/19/11 | G2-J                      | ND                         | ppm   |
| Area B          | 05/19/11 | G2-L                      | 153                        | ppm   |
| Area B          | 05/19/11 | G2-F                      | 435                        | ppm   |
| <b>Pirlings</b> |          |                           |                            |       |
| Area B          | 05/19/11 | P6-C Pirling From Ceiling | 53                         | ppm   |
| Area B          | 05/19/11 | P9-C Pirling From Ceiling | 43                         | ppm   |
| Area B          | 05/19/11 | P7-C Pirling From Ceiling | 31                         | ppm   |
| <b>Ceiling</b>  |          |                           |                            |       |
| Area B          | 05/19/11 | Ceiling Corner 3          | 26                         | ppm   |
| Area B          | 05/19/11 | Ceiling Corner 4-D3       | 52                         | ppm   |
| Area B          | 05/19/11 | Ceiling Corner 2-D3       | 64                         | ppm   |
| Area B          | 05/19/11 | Ceiling Corner 1-B3       | 63                         | ppm   |
| Area B          | 05/19/11 | Ceiling Corner 2-B3       | 237                        | ppm   |

**TABLE 3**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area B**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b>   | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|---------------------|-----------------------------------|--------------|
| Area B          | 05/19/11    | Ceiling Corner 3-B3 | 30                                | ppm          |
| Area B          | 05/19/11    | Ceiling Corner 4-B3 | 61                                | ppm          |
| Area B          | 05/19/11    | Ceiling Corner 2-G2 | 91                                | ppm          |
| Area B          | 05/19/11    | Ceiling Corner 1-G2 | ND                                | ppm          |
| Area B          | 05/19/11    | Ceiling Corner 3-G2 | 48                                | ppm          |
| Area B          | 05/19/11    | Ceiling Corner 4-G2 | 50                                | ppm          |
| Area B          | 05/19/11    | Ceiling Corner 4-B5 | 209                               | ppm          |
| Area B          | 05/19/11    | Ceiling Corner 1-B5 | 34                                | ppm          |

Notes:

- 1) XRF - X-Ray Fluorescence
- 2) I.D - Identification
- 3) ppm - parts per million
- 4) ND - Non-Detect

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 09/19/11    | A1                | 250                               | ppm          |
| Area C          | 09/19/11    | A2                | 290                               | ppm          |
| Area C          | 09/19/11    | A3                | 492                               | ppm          |
| Area C          | 09/19/11    | A4                | 871                               | ppm          |
| Area C          | 09/19/11    | A5                | 1662                              | ppm          |
| Area C          | 09/19/11    | A6                | 2797                              | ppm          |
| Area C          | 09/19/11    | A7                | 5964                              | ppm          |
| Area C          | 09/19/11    | A8                | 4796                              | ppm          |
| Area C          | 09/19/11    | A9                | 3279                              | ppm          |
| Area C          | 09/19/11    | A10               | 4006                              | ppm          |
| Area C          | 09/19/11    | A11               | 4899                              | ppm          |
| Area C          | 09/19/11    | A12               | 12349                             | ppm          |
| Area C          | 09/19/11    | B1                | 554                               | ppm          |
| Area C          | 09/19/11    | B2                | 408                               | ppm          |
| Area C          | 09/19/11    | B3                | 335                               | ppm          |
| Area C          | 09/19/11    | B4                | 2044                              | ppm          |
| Area C          | 09/19/11    | B5                | 1244                              | ppm          |
| Area C          | 09/19/11    | B6                | 1742                              | ppm          |
| Area C          | 09/19/11    | B7                | 5212                              | ppm          |
| Area C          | 09/19/11    | B8                | 12928                             | ppm          |
| Area C          | 09/19/11    | B9                | 4301                              | ppm          |
| Area C          | 09/19/11    | B10               | 2331                              | ppm          |
| Area C          | 09/19/11    | B10               | 7201                              | ppm          |
| Area C          | 09/19/11    | B11               | 7094                              | ppm          |
| Area C          | 09/19/11    | B12               | 2183                              | ppm          |
| Area C          | 09/19/11    | B13               | 4449                              | ppm          |
| Area C          | 09/19/11    | B14               | 4005                              | ppm          |
| Area C          | 09/19/11    | B15               | 2283                              | ppm          |
| Area C          | 09/19/11    | B16               | 8250                              | ppm          |
| Area C          | 09/19/11    | B17               | 2769                              | ppm          |
| Area C          | 09/19/11    | B18               | 17307                             | ppm          |
| Area C          | 09/19/11    | B19               | 8352                              | ppm          |
| Area C          | 09/19/11    | B20               | 7921                              | ppm          |
| Area C          | 09/19/11    | B21               | 3351                              | ppm          |
| Area C          | 09/19/11    | B22               | 650                               | ppm          |
| Area C          | 09/19/11    | B23               | 1005                              | ppm          |
| Area C          | 09/19/11    | B24               | 1040                              | ppm          |
| Area C          | 09/19/11    | C1                | 358                               | ppm          |
| Area C          | 09/19/11    | C2                | 357                               | ppm          |
| Area C          | 09/19/11    | C3                | 489                               | ppm          |
| Area C          | 09/19/11    | C4                | 427                               | ppm          |
| Area C          | 09/19/11    | C5                | 1436                              | ppm          |
| Area C          | 09/19/11    | C6                | 1012                              | ppm          |
| Area C          | 09/19/11    | C7                | 895                               | ppm          |
| Area C          | 09/19/11    | C8                | 5486                              | ppm          |
| Area C          | 09/19/11    | C9                | 2661                              | ppm          |
| Area C          | 09/19/11    | G1                | 750                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 09/19/11    | G2                | 723                               | ppm          |
| Area C          | 09/19/11    | J6                | 1896                              | ppm          |
| Area C          | 09/19/11    | K6                | 1480                              | ppm          |
| Area C          | 09/19/11    | L6                | 2716                              | ppm          |
| Area C          | 09/19/11    | M6                | 5506                              | ppm          |
| Area C          | 09/19/11    | N6                | 773                               | ppm          |
| Area C          | 09/19/11    | O6                | 1010                              | ppm          |
| Area C          | 09/19/11    | P6                | 769                               | ppm          |
| Area C          | 09/19/11    | Q6                | 686                               | ppm          |
| Area C          | 09/19/11    | O10               | 2963                              | ppm          |
| Area C          | 09/19/11    | O11               | 1811                              | ppm          |
| Area C          | 09/19/11    | O12               | 1053                              | ppm          |
| Area C          | 09/19/11    | O13               | 1542                              | ppm          |
| Area C          | 09/19/11    | O14               | 2784                              | ppm          |
| Area C          | 09/19/11    | L14               | 5793                              | ppm          |
| Area C          | 09/19/11    | L14               | 7735                              | ppm          |
| Area C          | 09/19/11    | J16               | 4581                              | ppm          |
| Area C          | 09/19/11    | J24               | 1315                              | ppm          |
| Area C          | 09/20/11    | A3                | 710                               | ppm          |
| Area C          | 09/20/11    | A3                | 389                               | ppm          |
| Area C          | 09/20/11    | A19               | 25738                             | ppm          |
| Area C          | 09/20/11    | A19               | 3403                              | ppm          |
| Area C          | 09/20/11    | A19               | 10038                             | ppm          |
| Area C          | 09/20/11    | A19               | 3439                              | ppm          |
| Area C          | 09/20/11    | A19               | 304                               | ppm          |
| Area C          | 09/20/11    | A19               | 2258                              | ppm          |
| Area C          | 09/20/11    | A19               | 5586                              | ppm          |
| Area C          | 09/20/11    | A19               | 1839                              | ppm          |
| Area C          | 09/20/11    | A19               | 504                               | ppm          |
| Area C          | 09/20/11    | A19               | 320                               | ppm          |
| Area C          | 09/20/11    | A19               | 298                               | ppm          |
| Area C          | 09/20/11    | A19               | 168                               | ppm          |
| Area C          | 09/20/11    | A19               | 233                               | ppm          |
| Area C          | 09/20/11    | A19               | 455                               | ppm          |
| Area C          | 09/20/11    | A19               | 1383                              | ppm          |
| Area C          | 09/20/11    | A19               | 1790                              | ppm          |
| Area C          | 09/20/11    | A19               | 270                               | ppm          |
| Area C          | 09/20/11    | A19               | 431                               | ppm          |
| Area C          | 09/20/11    | A19               | 1654                              | ppm          |
| Area C          | 09/20/11    | A19               | 4090                              | ppm          |
| Area C          | 09/22/11    | B1                | 99                                | ppm          |
| Area C          | 09/22/11    | B2                | 168                               | ppm          |
| Area C          | 09/22/11    | B3                | 253                               | ppm          |
| Area C          | 09/22/11    | B4                | 403                               | ppm          |
| Area C          | 09/22/11    | B5                | 377                               | ppm          |
| Area C          | 09/22/11    | B6                | 1029                              | ppm          |
| Area C          | 09/22/11    | B7                | 1174                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 09/22/11    | B8                | 906                               | ppm          |
| Area C          | 09/22/11    | B9                | 2867                              | ppm          |
| Area C          | 09/29/11    | N9                | 1723                              | ppm          |
| Area C          | 09/29/11    | A1                | 227                               | ppm          |
| Area C          | 09/29/11    | A2                | 118                               | ppm          |
| Area C          | 09/29/11    | A3                | 87                                | ppm          |
| Area C          | 09/29/11    | A4                | 202                               | ppm          |
| Area C          | 09/29/11    | A5                | 295                               | ppm          |
| Area C          | 09/29/11    | A6                | 1179                              | ppm          |
| Area C          | 09/29/11    | A7                | 472                               | ppm          |
| Area C          | 09/29/11    | A8                | 703                               | ppm          |
| Area C          | 09/29/11    | A9                | 670                               | ppm          |
| Area C          | 09/29/11    | A10               | 487                               | ppm          |
| Area C          | 09/29/11    | A11               | 1139                              | ppm          |
| Area C          | 09/29/11    | A12               | 3819                              | ppm          |
| Area C          | 09/29/11    | A13               | 1049                              | ppm          |
| Area C          | 09/29/11    | A14               | 287                               | ppm          |
| Area C          | 09/29/11    | A15               | 655                               | ppm          |
| Area C          | 09/29/11    | A16               | 1475                              | ppm          |
| Area C          | 09/29/11    | A17               | 4093                              | ppm          |
| Area C          | 09/29/11    | A17               | 1135                              | ppm          |
| Area C          | 09/29/11    | A18               | 1058                              | ppm          |
| Area C          | 09/29/11    | A19               | 9088                              | ppm          |
| Area C          | 09/29/11    | A19               | 6146                              | ppm          |
| Area C          | 09/29/11    | A20               | 691                               | ppm          |
| Area C          | 09/29/11    | A21               | 1143                              | ppm          |
| Area C          | 09/29/11    | A22               | 540                               | ppm          |
| Area C          | 09/29/11    | A23               | 216                               | ppm          |
| Area C          | 09/29/11    | A24               | 201                               | ppm          |
| Area C          | 09/29/11    | A22               | 1861                              | ppm          |
| Area C          | 09/29/11    | B1                | 837                               | ppm          |
| Area C          | 09/29/11    | B2                | 202                               | ppm          |
| Area C          | 09/29/11    | B3                | 394                               | ppm          |
| Area C          | 09/29/11    | B4                | 352                               | ppm          |
| Area C          | 09/29/11    | B5                | 506                               | ppm          |
| Area C          | 09/29/11    | B6                | 1384                              | ppm          |
| Area C          | 09/29/11    | B7                | 623                               | ppm          |
| Area C          | 09/29/11    | B8                | 3299                              | ppm          |
| Area C          | 09/29/11    | B9                | 1247                              | ppm          |
| Area C          | 09/29/11    | B10               | 448                               | ppm          |
| Area C          | 09/29/11    | B11               | 2877                              | ppm          |
| Area C          | 09/29/11    | B12               | 2018                              | ppm          |
| Area C          | 09/29/11    | B13               | 712                               | ppm          |
| Area C          | 09/29/11    | B14               | 1264                              | ppm          |
| Area C          | 09/29/11    | B15               | 1565                              | ppm          |
| Area C          | 09/29/11    | B16               | 1774                              | ppm          |
| Area C          | 09/29/11    | B17               | 1634                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 09/29/11    | B18               | 1152                              | ppm          |
| Area C          | 09/29/11    | B19               | 4880                              | ppm          |
| Area C          | 09/29/11    | B20               | 942                               | ppm          |
| Area C          | 09/29/11    | B21               | 834                               | ppm          |
| Area C          | 09/29/11    | B22               | 353                               | ppm          |
| Area C          | 09/29/11    | B23               | 203                               | ppm          |
| Area C          | 09/29/11    | B24               | 201                               | ppm          |
| Area C          | 09/29/11    | C1                | 239                               | ppm          |
| Area C          | 09/29/11    | C2                | 308                               | ppm          |
| Area C          | 09/29/11    | C3                | 259                               | ppm          |
| Area C          | 09/29/11    | C4                | 302                               | ppm          |
| Area C          | 09/29/11    | C5                | 306                               | ppm          |
| Area C          | 09/29/11    | C6                | 1124                              | ppm          |
| Area C          | 09/29/11    | C7                | 495                               | ppm          |
| Area C          | 09/29/11    | C8                | 849                               | ppm          |
| Area C          | 09/29/11    | C9                | 438                               | ppm          |
| Area C          | 09/30/11    | C10               | 1251                              | ppm          |
| Area C          | 09/30/11    | C11               | 556                               | ppm          |
| Area C          | 09/30/11    | C12               | 775                               | ppm          |
| Area C          | 09/30/11    | C13               | 1083                              | ppm          |
| Area C          | 09/30/11    | C14               | 677                               | ppm          |
| Area C          | 09/30/11    | C15               | 1002                              | ppm          |
| Area C          | 09/30/11    | C16               | 1474                              | ppm          |
| Area C          | 09/30/11    | C17               | 769                               | ppm          |
| Area C          | 09/30/11    | C18               | 758                               | ppm          |
| Area C          | 09/30/11    | C19               | 1517                              | ppm          |
| Area C          | 09/30/11    | C20               | 1053                              | ppm          |
| Area C          | 09/30/11    | C21               | 1923                              | ppm          |
| Area C          | 09/30/11    | C22               | 806                               | ppm          |
| Area C          | 09/30/11    | C23               | 368                               | ppm          |
| Area C          | 09/30/11    | C24               | 299                               | ppm          |
| Area C          | 09/30/11    | D1                | 174                               | ppm          |
| Area C          | 09/30/11    | D2                | 265                               | ppm          |
| Area C          | 09/30/11    | D3                | 279                               | ppm          |
| Area C          | 09/30/11    | D4                | 579                               | ppm          |
| Area C          | 09/30/11    | D5                | 744                               | ppm          |
| Area C          | 09/30/11    | D6                | 550                               | ppm          |
| Area C          | 09/30/11    | D7                | 2437                              | ppm          |
| Area C          | 09/30/11    | D8                | 7582                              | ppm          |
| Area C          | 09/30/11    | D9                | 3652                              | ppm          |
| Area C          | 09/30/11    | D10               | 1453                              | ppm          |
| Area C          | 09/30/11    | D11               | 2972                              | ppm          |
| Area C          | 09/30/11    | D12               | 627                               | ppm          |
| Area C          | 09/30/11    | D13               | 947                               | ppm          |
| Area C          | 09/30/11    | D14               | 357                               | ppm          |
| Area C          | 09/30/11    | D15               | 1211                              | ppm          |
| Area C          | 09/30/11    | D16               | 1653                              | ppm          |



**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 09/30/11    | D17               | 1589                              | ppm          |
| Area C          | 09/30/11    | D18               | 718                               | ppm          |
| Area C          | 09/30/11    | D19               | 3235                              | ppm          |
| Area C          | 09/30/11    | D20               | 12958                             | ppm          |
| Area C          | 09/30/11    | D21               | 5179                              | ppm          |
| Area C          | 09/30/11    | D22               | 588                               | ppm          |
| Area C          | 09/30/11    | D23               | 1198                              | ppm          |
| Area C          | 09/30/11    | D24               | 2062                              | ppm          |
| Area C          | 09/30/11    | E1                | 199                               | ppm          |
| Area C          | 09/30/11    | E2                | 225                               | ppm          |
| Area C          | 09/30/11    | E3                | 497                               | ppm          |
| Area C          | 09/30/11    | E4                | 448                               | ppm          |
| Area C          | 09/30/11    | E5                | 346                               | ppm          |
| Area C          | 09/30/11    | E6                | 1406                              | ppm          |
| Area C          | 09/30/11    | E7                | 4722                              | ppm          |
| Area C          | 09/30/11    | E8                | 3541                              | ppm          |
| Area C          | 09/30/11    | E9                | 2211                              | ppm          |
| Area C          | 09/30/11    | E10               | 1434                              | ppm          |
| Area C          | 09/30/11    | E11               | 928                               | ppm          |
| Area C          | 09/30/11    | E12               | 1113                              | ppm          |
| Area C          | 09/30/11    | E13               | 292                               | ppm          |
| Area C          | 09/30/11    | E14               | 708                               | ppm          |
| Area C          | 09/30/11    | E15               | 1519                              | ppm          |
| Area C          | 09/30/11    | E16               | 1469                              | ppm          |
| Area C          | 09/30/11    | E17               | 2466                              | ppm          |
| Area C          | 09/30/11    | E18               | 1560                              | ppm          |
| Area C          | 09/30/11    | E19               | 2170                              | ppm          |
| Area C          | 09/30/11    | E20               | 16724                             | ppm          |
| Area C          | 09/30/11    | E21               | 663                               | ppm          |
| Area C          | 09/30/11    | E22               | 589                               | ppm          |
| Area C          | 09/30/11    | E23               | 521                               | ppm          |
| Area C          | 09/30/11    | E24               | 1029                              | ppm          |
| Area C          | 09/30/11    | F1                | 149                               | ppm          |
| Area C          | 09/30/11    | F2                | 283                               | ppm          |
| Area C          | 09/30/11    | F3                | 271                               | ppm          |
| Area C          | 09/30/11    | F4                | 660                               | ppm          |
| Area C          | 09/30/11    | F5                | 676                               | ppm          |
| Area C          | 09/30/11    | F6                | 483                               | ppm          |
| Area C          | 09/30/11    | F7                | 1603                              | ppm          |
| Area C          | 09/30/11    | F8                | 2522                              | ppm          |
| Area C          | 09/30/11    | F9                | 1654                              | ppm          |
| Area C          | 09/30/11    | F10               | 2028                              | ppm          |
| Area C          | 09/30/11    | F11               | 1265                              | ppm          |
| Area C          | 09/30/11    | F12               | 1270                              | ppm          |
| Area C          | 09/30/11    | F13               | 751                               | ppm          |
| Area C          | 09/30/11    | F14               | 638                               | ppm          |
| Area C          | 09/30/11    | F15               | 738                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 09/30/11    | F16               | 1530                              | ppm          |
| Area C          | 09/30/11    | F17               | 1547                              | ppm          |
| Area C          | 09/30/11    | F18               | 5653                              | ppm          |
| Area C          | 09/30/11    | F19               | 6116                              | ppm          |
| Area C          | 09/30/11    | F20               | 5025                              | ppm          |
| Area C          | 09/30/11    | F21               | 1947                              | ppm          |
| Area C          | 09/30/11    | F22               | 1376                              | ppm          |
| Area C          | 09/30/11    | F23               | 654                               | ppm          |
| Area C          | 09/30/11    | F24               | 911                               | ppm          |
| Area C          | 09/30/11    | G1                | 109                               | ppm          |
| Area C          | 09/30/11    | G2                | 268                               | ppm          |
| Area C          | 09/30/11    | G3                | 346                               | ppm          |
| Area C          | 09/30/11    | G4                | 416                               | ppm          |
| Area C          | 09/30/11    | G5                | 572                               | ppm          |
| Area C          | 09/30/11    | G6                | 1342                              | ppm          |
| Area C          | 09/30/11    | G7                | 497                               | ppm          |
| Area C          | 09/30/11    | G8                | 1496                              | ppm          |
| Area C          | 09/30/11    | G9                | 1602                              | ppm          |
| Area C          | 09/30/11    | G10               | 901                               | ppm          |
| Area C          | 09/30/11    | G11               | 1608                              | ppm          |
| Area C          | 09/30/11    | G12               | 2058                              | ppm          |
| Area C          | 09/30/11    | G13               | 570                               | ppm          |
| Area C          | 09/30/11    | G14               | 682                               | ppm          |
| Area C          | 09/30/11    | G15               | 423                               | ppm          |
| Area C          | 09/30/11    | G16               | 1185                              | ppm          |
| Area C          | 09/30/11    | G17               | 2339                              | ppm          |
| Area C          | 09/30/11    | G18               | 12484                             | ppm          |
| Area C          | 09/30/11    | G19               | 4428                              | ppm          |
| Area C          | 09/30/11    | G20               | 2645                              | ppm          |
| Area C          | 09/30/11    | G21               | 1432                              | ppm          |
| Area C          | 09/30/11    | G22               | 686                               | ppm          |
| Area C          | 09/30/11    | G23               | 736                               | ppm          |
| Area C          | 09/30/11    | G24               | 1544                              | ppm          |
| Area C          | 09/30/11    | H1                | 438                               | ppm          |
| Area C          | 09/30/11    | H3                | 635                               | ppm          |
| Area C          | 09/30/11    | H4                | 507                               | ppm          |
| Area C          | 09/30/11    | H5                | 219                               | ppm          |
| Area C          | 09/30/11    | H6                | 652                               | ppm          |
| Area C          | 09/30/11    | H7                | 1136                              | ppm          |
| Area C          | 09/30/11    | H8                | 2539                              | ppm          |
| Area C          | 09/30/11    | H9                | 1724                              | ppm          |
| Area C          | 09/30/11    | H10               | 1195                              | ppm          |
| Area C          | 09/30/11    | H11               | 1077                              | ppm          |
| Area C          | 09/30/11    | H12               | 857                               | ppm          |
| Area C          | 09/30/11    | H13               | 448                               | ppm          |
| Area C          | 09/30/11    | H14               | 457                               | ppm          |
| Area C          | 09/30/11    | H15               | 769                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 09/30/11    | H16               | 1144                              | ppm          |
| Area C          | 09/30/11    | H17               | 2478                              | ppm          |
| Area C          | 09/30/11    | H18               | 1643                              | ppm          |
| Area C          | 09/30/11    | H19               | 2333                              | ppm          |
| Area C          | 09/30/11    | H20               | 1399                              | ppm          |
| Area C          | 09/30/11    | H21               | 1445                              | ppm          |
| Area C          | 09/30/11    | H22               | 1160                              | ppm          |
| Area C          | 10/04/11    | A6                | 1500                              | ppm          |
| Area C          | 10/04/11    | A6                | 962                               | ppm          |
| Area C          | 10/04/11    | A6                | 487                               | ppm          |
| Area C          | 10/04/11    | A6                | 34130                             | ppm          |
| Area C          | 10/04/11    | A6                | 920                               | ppm          |
| Area C          | 10/04/11    | A6                | 30569                             | ppm          |
| Area C          | 10/04/11    | A6                | 752                               | ppm          |
| Area C          | 10/04/11    | A6                | 511                               | ppm          |
| Area C          | 10/04/11    | H22               | 842                               | ppm          |
| Area C          | 10/04/11    | H23               | 1042                              | ppm          |
| Area C          | 10/04/11    | H24               | 4760                              | ppm          |
| Area C          | 10/04/11    | I3                | 327                               | ppm          |
| Area C          | 10/04/11    | I4                | 524                               | ppm          |
| Area C          | 10/04/11    | I5                | 1103                              | ppm          |
| Area C          | 10/04/11    | I6                | 1132                              | ppm          |
| Area C          | 10/04/11    | I7                | 2338                              | ppm          |
| Area C          | 10/04/11    | I8                | 1196                              | ppm          |
| Area C          | 10/04/11    | I9                | 662                               | ppm          |
| Area C          | 10/04/11    | I10               | 1016                              | ppm          |
| Area C          | 10/04/11    | I11               | 2815                              | ppm          |
| Area C          | 10/04/11    | I12               | 2802                              | ppm          |
| Area C          | 10/04/11    | I13               | 1313                              | ppm          |
| Area C          | 10/04/11    | I14               | 2042                              | ppm          |
| Area C          | 10/04/11    | I15               | 1341                              | ppm          |
| Area C          | 10/04/11    | I16               | 3089                              | ppm          |
| Area C          | 10/04/11    | I17               | 3231                              | ppm          |
| Area C          | 10/04/11    | I18               | 3512                              | ppm          |
| Area C          | 10/04/11    | I19               | 554                               | ppm          |
| Area C          | 10/04/11    | I20               | 1035                              | ppm          |
| Area C          | 10/04/11    | I21               | 397                               | ppm          |
| Area C          | 10/04/11    | I22               | 523                               | ppm          |
| Area C          | 10/04/11    | I23               | 822                               | ppm          |
| Area C          | 10/04/11    | I24               | 1097                              | ppm          |
| Area C          | 10/05/11    | J1                | 654                               | ppm          |
| Area C          | 10/05/11    | J5                | 517                               | ppm          |
| Area C          | 10/05/11    | J6                | 1374                              | ppm          |
| Area C          | 10/05/11    | J7                | 1650                              | ppm          |
| Area C          | 10/05/11    | J8                | 1864                              | ppm          |
| Area C          | 10/05/11    | J9                | 2474                              | ppm          |
| Area C          | 10/05/11    | J10               | 1196                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/05/11    | J11               | 2422                              | ppm          |
| Area C          | 10/05/11    | J12               | 2392                              | ppm          |
| Area C          | 10/05/11    | N15               | 1091                              | ppm          |
| Area C          | 10/05/11    | J13               | 2000                              | ppm          |
| Area C          | 10/05/11    | J14               | 713                               | ppm          |
| Area C          | 10/05/11    | J15               | 4567                              | ppm          |
| Area C          | 10/05/11    | J16               | 2480                              | ppm          |
| Area C          | 10/05/11    | J17               | 2154                              | ppm          |
| Area C          | 10/05/11    | J18               | 1990                              | ppm          |
| Area C          | 10/05/11    | J19               | 1875                              | ppm          |
| Area C          | 10/05/11    | J20               | 1914                              | ppm          |
| Area C          | 10/05/11    | J21               | 271                               | ppm          |
| Area C          | 10/05/11    | J22               | 479                               | ppm          |
| Area C          | 10/05/11    | J23               | 510                               | ppm          |
| Area C          | 10/05/11    | J24               | 848                               | ppm          |
| Area C          | 10/05/11    | K5                | 2403                              | ppm          |
| Area C          | 10/05/11    | K6                | 1394                              | ppm          |
| Area C          | 10/05/11    | K7                | 978                               | ppm          |
| Area C          | 10/05/11    | K8                | 1459                              | ppm          |
| Area C          | 10/05/11    | K9                | 1238                              | ppm          |
| Area C          | 10/05/11    | K10               | 1407                              | ppm          |
| Area C          | 10/05/11    | K11               | 2329                              | ppm          |
| Area C          | 10/05/11    | K12               | 2677                              | ppm          |
| Area C          | 10/05/11    | K13               | 2001                              | ppm          |
| Area C          | 10/05/11    | K14               | 1704                              | ppm          |
| Area C          | 10/05/11    | K15               | 2689                              | ppm          |
| Area C          | 10/05/11    | K16               | 1976                              | ppm          |
| Area C          | 10/05/11    | K17               | 2816                              | ppm          |
| Area C          | 10/05/11    | K18               | 2425                              | ppm          |
| Area C          | 10/05/11    | K19               | 5559                              | ppm          |
| Area C          | 10/05/11    | K20               | 1886                              | ppm          |
| Area C          | 10/05/11    | K21               | 709                               | ppm          |
| Area C          | 10/05/11    | L7                | 1053                              | ppm          |
| Area C          | 10/05/11    | L8                | 1383                              | ppm          |
| Area C          | 10/05/11    | L9                | 1570                              | ppm          |
| Area C          | 10/05/11    | L10               | 1675                              | ppm          |
| Area C          | 10/05/11    | L11               | 1306                              | ppm          |
| Area C          | 10/05/11    | L12               | 1757                              | ppm          |
| Area C          | 10/05/11    | L13               | 2718                              | ppm          |
| Area C          | 10/05/11    | L14               | 6431                              | ppm          |
| Area C          | 10/05/11    | L15               | 2560                              | ppm          |
| Area C          | 10/05/11    | L16               | 1916                              | ppm          |
| Area C          | 10/05/11    | L17               | 2027                              | ppm          |
| Area C          | 10/05/11    | L18               | 1484                              | ppm          |
| Area C          | 10/05/11    | L19               | 2041                              | ppm          |
| Area C          | 10/05/11    | L20               | 2981                              | ppm          |
| Area C          | 10/05/11    | M7                | 3388                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/05/11    | M8                | 2493                              | ppm          |
| Area C          | 10/05/11    | M9                | 1305                              | ppm          |
| Area C          | 10/05/11    | M10               | 1812                              | ppm          |
| Area C          | 10/05/11    | M11               | 1496                              | ppm          |
| Area C          | 10/05/11    | M12               | 3339                              | ppm          |
| Area C          | 10/05/11    | M13               | 1630                              | ppm          |
| Area C          | 10/05/11    | M14               | 2357                              | ppm          |
| Area C          | 10/05/11    | M15               | 3731                              | ppm          |
| Area C          | 10/05/11    | M16               | 1338                              | ppm          |
| Area C          | 10/05/11    | M17               | 2244                              | ppm          |
| Area C          | 10/05/11    | M18               | 2308                              | ppm          |
| Area C          | 10/05/11    | M19               | 2399                              | ppm          |
| Area C          | 10/05/11    | N6                | 887                               | ppm          |
| Area C          | 10/05/11    | N7                | 2801                              | ppm          |
| Area C          | 10/05/11    | N8                | 1105                              | ppm          |
| Area C          | 10/05/11    | N9                | 1964                              | ppm          |
| Area C          | 10/05/11    | N10               | 1050                              | ppm          |
| Area C          | 10/05/11    | N11               | 908                               | ppm          |
| Area C          | 10/05/11    | N12               | 586                               | ppm          |
| Area C          | 10/05/11    | N13               | 1174                              | ppm          |
| Area C          | 10/05/11    | N14               | 3320                              | ppm          |
| Area C          | 10/05/11    | N15               | 632                               | ppm          |
| Area C          | 10/05/11    | N16               | 635                               | ppm          |
| Area C          | 10/05/11    | N17               | 906                               | ppm          |
| Area C          | 10/05/11    | N18               | 2028                              | ppm          |
| Area C          | 10/05/11    | N19               | 1223                              | ppm          |
| Area C          | 10/19/11    | A1                | 188                               | ppm          |
| Area C          | 10/19/11    | A2                | 152                               | ppm          |
| Area C          | 10/19/11    | A3                | 184                               | ppm          |
| Area C          | 10/19/11    | A4                | 251                               | ppm          |
| Area C          | 10/19/11    | A5                | 432                               | ppm          |
| Area C          | 10/19/11    | A5                | 348                               | ppm          |
| Area C          | 10/19/11    | A6                | 291                               | ppm          |
| Area C          | 10/19/11    | A7                | 511                               | ppm          |
| Area C          | 10/19/11    | A8                | 298                               | ppm          |
| Area C          | 10/19/11    | A9                | 343                               | ppm          |
| Area C          | 10/19/11    | A10               | 351                               | ppm          |
| Area C          | 10/19/11    | A11               | 530                               | ppm          |
| Area C          | 10/19/11    | A12               | 373                               | ppm          |
| Area C          | 10/19/11    | A13               | 643                               | ppm          |
| Area C          | 10/19/11    | A14               | 277                               | ppm          |
| Area C          | 10/19/11    | A15               | 504                               | ppm          |
| Area C          | 10/19/11    | A16               | 738                               | ppm          |
| Area C          | 10/19/11    | A12               | 1168                              | ppm          |
| Area C          | 10/19/11    | A17               | 705                               | ppm          |
| Area C          | 10/19/11    | A18               | 301                               | ppm          |
| Area C          | 10/19/11    | A19               | 1522                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/19/11    | A20               | 252                               | ppm          |
| Area C          | 10/19/11    | A21               | 540                               | ppm          |
| Area C          | 10/19/11    | A22               | 360                               | ppm          |
| Area C          | 10/19/11    | A23               | 721                               | ppm          |
| Area C          | 10/19/11    | A24               | 405                               | ppm          |
| Area C          | 10/19/11    | B1                | 171                               | ppm          |
| Area C          | 10/19/11    | B2                | 209                               | ppm          |
| Area C          | 10/19/11    | B3                | 247                               | ppm          |
| Area C          | 10/19/11    | B4                | 232                               | ppm          |
| Area C          | 10/19/11    | B5                | 143                               | ppm          |
| Area C          | 10/19/11    | B6                | 386                               | ppm          |
| Area C          | 10/19/11    | B6                | 260                               | ppm          |
| Area C          | 10/19/11    | B8                | 322                               | ppm          |
| Area C          | 10/19/11    | B9                | 402                               | ppm          |
| Area C          | 10/19/11    | B10               | 300                               | ppm          |
| Area C          | 10/19/11    | B11               | 468                               | ppm          |
| Area C          | 10/19/11    | B12               | 266                               | ppm          |
| Area C          | 10/19/11    | B13               | 189                               | ppm          |
| Area C          | 10/19/11    | B14               | 267                               | ppm          |
| Area C          | 10/19/11    | B15               | 559                               | ppm          |
| Area C          | 10/19/11    | B16               | 395                               | ppm          |
| Area C          | 10/19/11    | B17               | 652                               | ppm          |
| Area C          | 10/19/11    | B18               | 679                               | ppm          |
| Area C          | 10/19/11    | B19               | 422                               | ppm          |
| Area C          | 10/19/11    | B20               | 930                               | ppm          |
| Area C          | 10/19/11    | B21               | 781                               | ppm          |
| Area C          | 10/19/11    | B22               | 282                               | ppm          |
| Area C          | 10/19/11    | B23               | 353                               | ppm          |
| Area C          | 10/19/11    | B24               | 373                               | ppm          |
| Area C          | 10/19/11    | C1                | 220                               | ppm          |
| Area C          | 10/19/11    | C2                | 494                               | ppm          |
| Area C          | 10/19/11    | C3                | 418                               | ppm          |
| Area C          | 10/19/11    | C4                | 742                               | ppm          |
| Area C          | 10/19/11    | C5                | 244                               | ppm          |
| Area C          | 10/19/11    | C6                | 446                               | ppm          |
| Area C          | 10/19/11    | C7                | 339                               | ppm          |
| Area C          | 10/19/11    | C8                | 287                               | ppm          |
| Area C          | 10/19/11    | C9                | 371                               | ppm          |
| Area C          | 10/19/11    | C10               | 257                               | ppm          |
| Area C          | 10/19/11    | C11               | 347                               | ppm          |
| Area C          | 10/19/11    | C12               | 253                               | ppm          |
| Area C          | 10/19/11    | C13               | 370                               | ppm          |
| Area C          | 10/19/11    | C14               | 222                               | ppm          |
| Area C          | 10/19/11    | C15               | 268                               | ppm          |
| Area C          | 10/19/11    | C16               | 207                               | ppm          |
| Area C          | 10/19/11    | C17               | 1035                              | ppm          |
| Area C          | 10/19/11    | C18               | 198                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/19/11    | C19               | 1216                              | ppm          |
| Area C          | 10/19/11    | C20               | 280                               | ppm          |
| Area C          | 10/19/11    | C21               | 441                               | ppm          |
| Area C          | 10/19/11    | C22               | 420                               | ppm          |
| Area C          | 10/19/11    | C23               | 314                               | ppm          |
| Area C          | 10/19/11    | C24               | 542                               | ppm          |
| Area C          | 10/19/11    | D1                | 193                               | ppm          |
| Area C          | 10/19/11    | D2                | 320                               | ppm          |
| Area C          | 10/19/11    | D3                | 391                               | ppm          |
| Area C          | 10/19/11    | D4                | 434                               | ppm          |
| Area C          | 10/19/11    | D5                | 198                               | ppm          |
| Area C          | 10/19/11    | D6                | 257                               | ppm          |
| Area C          | 10/19/11    | D7                | 344                               | ppm          |
| Area C          | 10/19/11    | D8                | 221                               | ppm          |
| Area C          | 10/19/11    | D9                | 183                               | ppm          |
| Area C          | 10/19/11    | D10               | 333                               | ppm          |
| Area C          | 10/19/11    | D11               | 506                               | ppm          |
| Area C          | 10/19/11    | D12               | 847                               | ppm          |
| Area C          | 10/19/11    | D13               | 473                               | ppm          |
| Area C          | 10/19/11    | D14               | 265                               | ppm          |
| Area C          | 10/19/11    | D15               | 546                               | ppm          |
| Area C          | 10/19/11    | D16               | 610                               | ppm          |
| Area C          | 10/19/11    | D17               | 378                               | ppm          |
| Area C          | 10/19/11    | D18               | 716                               | ppm          |
| Area C          | 10/19/11    | D19               | 1615                              | ppm          |
| Area C          | 10/19/11    | D20               | 756                               | ppm          |
| Area C          | 10/19/11    | D21               | 356                               | ppm          |
| Area C          | 10/19/11    | D22               | 542                               | ppm          |
| Area C          | 10/19/11    | D23               | 426                               | ppm          |
| Area C          | 10/19/11    | D24               | 628                               | ppm          |
| Area C          | 10/19/11    | E1                | 426                               | ppm          |
| Area C          | 10/19/11    | E2                | 301                               | ppm          |
| Area C          | 10/19/11    | E3                | 252                               | ppm          |
| Area C          | 10/19/11    | E4                | 271                               | ppm          |
| Area C          | 10/19/11    | E5                | 415                               | ppm          |
| Area C          | 10/19/11    | E6                | 515                               | ppm          |
| Area C          | 10/19/11    | E7                | 702                               | ppm          |
| Area C          | 10/19/11    | E8                | 1169                              | ppm          |
| Area C          | 10/19/11    | E9                | 176                               | ppm          |
| Area C          | 10/19/11    | E10               | 459                               | ppm          |
| Area C          | 10/19/11    | E11               | 366                               | ppm          |
| Area C          | 10/19/11    | E12               | 467                               | ppm          |
| Area C          | 10/19/11    | E13               | 211                               | ppm          |
| Area C          | 10/19/11    | E14               | 270                               | ppm          |
| Area C          | 10/19/11    | E15               | 473                               | ppm          |
| Area C          | 10/19/11    | E16               | 461                               | ppm          |
| Area C          | 10/19/11    | E17               | 255                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/19/11    | E18               | 605                               | ppm          |
| Area C          | 10/19/11    | E19               | 446                               | ppm          |
| Area C          | 10/19/11    | E20               | 221                               | ppm          |
| Area C          | 10/19/11    | E21               | 937                               | ppm          |
| Area C          | 10/19/11    | E22               | 251                               | ppm          |
| Area C          | 10/19/11    | E23               | 167                               | ppm          |
| Area C          | 10/19/11    | E24               | 397                               | ppm          |
| Area C          | 10/19/11    | F1                | 215                               | ppm          |
| Area C          | 10/19/11    | F2                | 317                               | ppm          |
| Area C          | 10/19/11    | F3                | 508                               | ppm          |
| Area C          | 10/19/11    | F4                | 274                               | ppm          |
| Area C          | 10/19/11    | F5                | 310                               | ppm          |
| Area C          | 10/19/11    | F6                | 233                               | ppm          |
| Area C          | 10/19/11    | F7                | 4278                              | ppm          |
| Area C          | 10/19/11    | F7                | 2937                              | ppm          |
| Area C          | 10/19/11    | F9                | 773                               | ppm          |
| Area C          | 10/19/11    | F10               | 839                               | ppm          |
| Area C          | 10/19/11    | F11               | 907                               | ppm          |
| Area C          | 10/19/11    | F12               | 421                               | ppm          |
| Area C          | 10/19/11    | F13               | 1260                              | ppm          |
| Area C          | 10/19/11    | F13               | 170                               | ppm          |
| Area C          | 10/19/11    | F14               | 174                               | ppm          |
| Area C          | 10/19/11    | F15               | 430                               | ppm          |
| Area C          | 10/19/11    | F16               | 2118                              | ppm          |
| Area C          | 10/19/11    | F17               | 1013                              | ppm          |
| Area C          | 10/19/11    | F18               | 365                               | ppm          |
| Area C          | 10/19/11    | F19               | 754                               | ppm          |
| Area C          | 10/19/11    | F19               | 570                               | ppm          |
| Area C          | 10/19/11    | F20               | 303                               | ppm          |
| Area C          | 10/19/11    | F21               | 841                               | ppm          |
| Area C          | 10/19/11    | F22               | 449                               | ppm          |
| Area C          | 10/19/11    | F18               | 241                               | ppm          |
| Area C          | 10/19/11    | F7                | 1048                              | ppm          |
| Area C          | 10/19/11    | F3                | 251                               | ppm          |
| Area C          | 10/19/11    | test              | 850                               | ppm          |
| Area C          | 10/19/11    | test              | 1222                              | ppm          |
| Area C          | 10/19/11    | test              | 1394                              | ppm          |
| Area C          | 10/19/11    | F22               | 328                               | ppm          |
| Area C          | 10/19/11    | F23               | 496                               | ppm          |
| Area C          | 10/19/11    | F24               | 202                               | ppm          |
| Area C          | 10/19/11    | G1                | 151                               | ppm          |
| Area C          | 10/19/11    | G1                | 301                               | ppm          |
| Area C          | 10/19/11    | G3                | 328                               | ppm          |
| Area C          | 10/19/11    | G4                | 572                               | ppm          |
| Area C          | 10/19/11    | G5                | 423                               | ppm          |
| Area C          | 10/19/11    | G6                | 750                               | ppm          |
| Area C          | 10/19/11    | G7                | 500                               | ppm          |



**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/19/11    | G8                | 361                               | ppm          |
| Area C          | 10/19/11    | G9                | 3101                              | ppm          |
| Area C          | 10/19/11    | G10               | 438                               | ppm          |
| Area C          | 10/19/11    | G11               | 220                               | ppm          |
| Area C          | 10/19/11    | G12               | 534                               | ppm          |
| Area C          | 10/19/11    | G13               | 168                               | ppm          |
| Area C          | 10/19/11    | G14               | 162                               | ppm          |
| Area C          | 10/19/11    | G15               | 334                               | ppm          |
| Area C          | 10/19/11    | G16               | 479                               | ppm          |
| Area C          | 10/19/11    | G17               | 1258                              | ppm          |
| Area C          | 10/19/11    | G18               | 561                               | ppm          |
| Area C          | 10/19/11    | G19               | 1884                              | ppm          |
| Area C          | 10/19/11    | G20               | 781                               | ppm          |
| Area C          | 10/19/11    | G21               | 187                               | ppm          |
| Area C          | 10/19/11    | G22               | 291                               | ppm          |
| Area C          | 10/19/11    | G23               | 350                               | ppm          |
| Area C          | 10/19/11    | G24               | 205                               | ppm          |
| Area C          | 10/19/11    | H1                | 313                               | ppm          |
| Area C          | 10/19/11    | H2                | 541                               | ppm          |
| Area C          | 10/19/11    | H3                | 360                               | ppm          |
| Area C          | 10/19/11    | H4                | 707                               | ppm          |
| Area C          | 10/19/11    | H5                | 649                               | ppm          |
| Area C          | 10/19/11    | H6                | 598                               | ppm          |
| Area C          | 10/19/11    | H7                | 1446                              | ppm          |
| Area C          | 10/19/11    | H8                | 1608                              | ppm          |
| Area C          | 10/19/11    | H9                | 3414                              | ppm          |
| Area C          | 10/19/11    | H10               | 331                               | ppm          |
| Area C          | 10/19/11    | H11               | 323                               | ppm          |
| Area C          | 10/19/11    | H12               | 282                               | ppm          |
| Area C          | 10/19/11    | H13               | 879                               | ppm          |
| Area C          | 10/19/11    | H14               | 349                               | ppm          |
| Area C          | 10/19/11    | H15               | 609                               | ppm          |
| Area C          | 10/19/11    | H16               | 572                               | ppm          |
| Area C          | 10/19/11    | H17               | 294                               | ppm          |
| Area C          | 10/19/11    | H18               | 612                               | ppm          |
| Area C          | 10/19/11    | H19               | 1674                              | ppm          |
| Area C          | 10/19/11    | H20               | 831                               | ppm          |
| Area C          | 10/19/11    | H21               | 1415                              | ppm          |
| Area C          | 10/19/11    | H22               | 384                               | ppm          |
| Area C          | 10/19/11    | H23               | 513                               | ppm          |
| Area C          | 10/19/11    | H24               | 773                               | ppm          |
| Area C          | 10/19/11    | I5                | 426                               | ppm          |
| Area C          | 10/19/11    | I6                | 316                               | ppm          |
| Area C          | 10/19/11    | I7                | 704                               | ppm          |
| Area C          | 10/19/11    | I8                | 1785                              | ppm          |
| Area C          | 10/19/11    | I9                | 933                               | ppm          |
| Area C          | 10/19/11    | I10               | 444                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/19/11    | I11               | 433                               | ppm          |
| Area C          | 10/20/11    | I13               | 227                               | ppm          |
| Area C          | 10/20/11    | I14               | 165                               | ppm          |
| Area C          | 10/20/11    | I15               | 553                               | ppm          |
| Area C          | 10/20/11    | I16               | 249                               | ppm          |
| Area C          | 10/20/11    | I17               | 188                               | ppm          |
| Area C          | 10/20/11    | I18               | 211                               | ppm          |
| Area C          | 10/20/11    | I19               | 481                               | ppm          |
| Area C          | 10/20/11    | I20               | 609                               | ppm          |
| Area C          | 10/20/11    | I21               | 455                               | ppm          |
| Area C          | 10/20/11    | I22               | 299                               | ppm          |
| Area C          | 10/20/11    | I23               | 247                               | ppm          |
| Area C          | 10/20/11    | I24               | 196                               | ppm          |
| Area C          | 10/20/11    | G2                | 244                               | ppm          |
| Area C          | 10/20/11    | I12               | 161                               | ppm          |
| Area C          | 10/20/11    | J6                | 194                               | ppm          |
| Area C          | 10/20/11    | J7                | 431                               | ppm          |
| Area C          | 10/20/11    | J8                | 678                               | ppm          |
| Area C          | 10/20/11    | J9                | 701                               | ppm          |
| Area C          | 10/20/11    | J9                | 666                               | ppm          |
| Area C          | 10/20/11    | J10               | 410                               | ppm          |
| Area C          | 10/20/11    | J11               | 586                               | ppm          |
| Area C          | 10/20/11    | J12               | 923                               | ppm          |
| Area C          | 10/20/11    | J13               | 386                               | ppm          |
| Area C          | 10/20/11    | J14               | 987                               | ppm          |
| Area C          | 10/20/11    | J15               | 183                               | ppm          |
| Area C          | 10/20/11    | J16               | 1013                              | ppm          |
| Area C          | 10/20/11    | J17               | 212                               | ppm          |
| Area C          | 10/20/11    | J18               | 858                               | ppm          |
| Area C          | 10/20/11    | J19               | 477                               | ppm          |
| Area C          | 10/20/11    | J20               | 154                               | ppm          |
| Area C          | 10/20/11    | J21               | 207                               | ppm          |
| Area C          | 10/20/11    | J22               | 430                               | ppm          |
| Area C          | 10/20/11    | J22               | 582                               | ppm          |
| Area C          | 10/20/11    | J23               | 441                               | ppm          |
| Area C          | 10/20/11    | J24               | 399                               | ppm          |
| Area C          | 10/20/11    | K7                | 913                               | ppm          |
| Area C          | 10/20/11    | K8                | 1232                              | ppm          |
| Area C          | 10/20/11    | K9                | 363                               | ppm          |
| Area C          | 10/20/11    | K10               | 673                               | ppm          |
| Area C          | 10/20/11    | K11               | 1135                              | ppm          |
| Area C          | 10/20/11    | K12               | 1724                              | ppm          |
| Area C          | 10/20/11    | K13               | 1422                              | ppm          |
| Area C          | 10/20/11    | K14               | 901                               | ppm          |
| Area C          | 10/20/11    | K15               | 626                               | ppm          |
| Area C          | 10/20/11    | K16               | 1448                              | ppm          |
| Area C          | 10/20/11    | K17               | 310                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/20/11    | K18               | 2013                              | ppm          |
| Area C          | 10/20/11    | K19               | 1135                              | ppm          |
| Area C          | 10/20/11    | K20               | 1098                              | ppm          |
| Area C          | 10/20/11    | K21               | 743                               | ppm          |
| Area C          | 10/20/11    | K22               | 564                               | ppm          |
| Area C          | 10/20/11    | K23               | 150                               | ppm          |
| Area C          | 10/20/11    | K24               | 304                               | ppm          |
| Area C          | 10/20/11    | L8                | 426                               | ppm          |
| Area C          | 10/20/11    | L9                | 721                               | ppm          |
| Area C          | 10/20/11    | L10               | 450                               | ppm          |
| Area C          | 10/20/11    | L11               | 445                               | ppm          |
| Area C          | 10/20/11    | L12               | 699                               | ppm          |
| Area C          | 10/20/11    | L13               | 1521                              | ppm          |
| Area C          | 10/20/11    | L14               | 111                               | ppm          |
| Area C          | 10/20/11    | L15               | 193                               | ppm          |
| Area C          | 10/20/11    | L16               | 360                               | ppm          |
| Area C          | 10/20/11    | L17               | 570                               | ppm          |
| Area C          | 10/20/11    | L18               | 1611                              | ppm          |
| Area C          | 10/20/11    | L19               | 712                               | ppm          |
| Area C          | 10/20/11    | L20               | 661                               | ppm          |
| Area C          | 10/20/11    | M8                | 1545                              | ppm          |
| Area C          | 10/20/11    | M9                | 604                               | ppm          |
| Area C          | 10/20/11    | M10               | 606                               | ppm          |
| Area C          | 10/20/11    | M11               | 462                               | ppm          |
| Area C          | 10/20/11    | M12               | 723                               | ppm          |
| Area C          | 10/20/11    | M13               | 954                               | ppm          |
| Area C          | 10/20/11    | M14               | 1976                              | ppm          |
| Area C          | 10/20/11    | M15               | 460                               | ppm          |
| Area C          | 10/20/11    | M16               | 950                               | ppm          |
| Area C          | 10/20/11    | M17               | 295                               | ppm          |
| Area C          | 10/20/11    | M18               | 603                               | ppm          |
| Area C          | 10/20/11    | M19               | 566                               | ppm          |
| Area C          | 10/20/11    | M20               | 1128                              | ppm          |
| Area C          | 10/20/11    | N8                | 1007                              | ppm          |
| Area C          | 10/20/11    | N9                | 834                               | ppm          |
| Area C          | 10/20/11    | N10               | 597                               | ppm          |
| Area C          | 10/20/11    | N11               | 526                               | ppm          |
| Area C          | 10/20/11    | N12               | 228                               | ppm          |
| Area C          | 10/20/11    | N13               | 199                               | ppm          |
| Area C          | 10/20/11    | N14               | 506                               | ppm          |
| Area C          | 10/20/11    | N15               | 735                               | ppm          |
| Area C          | 10/20/11    | N16               | 317                               | ppm          |
| Area C          | 10/20/11    | N17               | 214                               | ppm          |
| Area C          | 10/20/11    | N18               | 429                               | ppm          |
| Area C          | 10/20/11    | N19               | 599                               | ppm          |
| Area C          | 10/20/11    | N20               | 567                               | ppm          |
| Area C          | 10/20/11    | O8                | 578                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/20/11    | O9                | 812                               | ppm          |
| Area C          | 10/20/11    | O10               | 508                               | ppm          |
| Area C          | 10/20/11    | O11               | 280                               | ppm          |
| Area C          | 10/20/11    | O12               | 212                               | ppm          |
| Area C          | 10/20/11    | O13               | 434                               | ppm          |
| Area C          | 10/20/11    | O14               | 377                               | ppm          |
| Area C          | 10/20/11    | O15               | 234                               | ppm          |
| Area C          | 10/20/11    | O16               | 216                               | ppm          |
| Area C          | 10/20/11    | O17               | 194                               | ppm          |
| Area C          | 10/20/11    | O18               | 175                               | ppm          |
| Area C          | 10/20/11    | O19               | 346                               | ppm          |
| Area C          | 10/20/11    | O20               | 665                               | ppm          |
| Area C          | 10/20/11    | P8                | 761                               | ppm          |
| Area C          | 10/20/11    | P9                | 769                               | ppm          |
| Area C          | 10/20/11    | P10               | 512                               | ppm          |
| Area C          | 10/20/11    | P11               | 775                               | ppm          |
| Area C          | 10/20/11    | P12               | 270                               | ppm          |
| Area C          | 10/20/11    | P13               | 275                               | ppm          |
| Area C          | 10/20/11    | P14               | 206                               | ppm          |
| Area C          | 10/20/11    | P15               | 427                               | ppm          |
| Area C          | 10/20/11    | P16               | 820                               | ppm          |
| Area C          | 10/20/11    | P17               | 644                               | ppm          |
| Area C          | 10/20/11    | P18               | 234                               | ppm          |
| Area C          | 10/20/11    | P18               | 311                               | ppm          |
| Area C          | 10/20/11    | P19               | 413                               | ppm          |
| Area C          | 10/20/11    | P20               | 580                               | ppm          |
| Area C          | 10/20/11    | Q11               | 836                               | ppm          |
| Area C          | 10/20/11    | Q12               | 1036                              | ppm          |
| Area C          | 10/20/11    | Q13               | 432                               | ppm          |
| Area C          | 10/20/11    | Q14               | 730                               | ppm          |
| Area C          | 10/20/11    | Q15               | 1234                              | ppm          |
| Area C          | 10/20/11    | Q16               | 1056                              | ppm          |
| Area C          | 10/20/11    | Q17               | 435                               | ppm          |
| Area C          | 10/20/11    | Q18               | 889                               | ppm          |
| Area C          | 10/20/11    | Q19               | 2959                              | ppm          |
| Area C          | 10/20/11    | Q20               | 520                               | ppm          |
| Area C          | 10/20/11    | R11               | 1402                              | ppm          |
| Area C          | 10/20/11    | R12               | 1173                              | ppm          |
| Area C          | 10/20/11    | R13               | 827                               | ppm          |
| Area C          | 10/20/11    | R14               | 1363                              | ppm          |
| Area C          | 10/20/11    | R15               | 1961                              | ppm          |
| Area C          | 10/20/11    | R16               | 264                               | ppm          |
| Area C          | 10/20/11    | R17               | 426                               | ppm          |
| Area C          | 10/20/11    | R18               | 1119                              | ppm          |
| Area C          | 10/20/11    | R19               | 2346                              | ppm          |
| Area C          | 10/20/11    | R20               | 291                               | ppm          |
| Area C          | 10/20/11    | F7                | 493                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/20/11    | S11               | 719                               | ppm          |
| Area C          | 10/20/11    | S12               | 484                               | ppm          |
| Area C          | 10/20/11    | S13               | 507                               | ppm          |
| Area C          | 10/20/11    | S14               | 812                               | ppm          |
| Area C          | 10/20/11    | S15               | 652                               | ppm          |
| Area C          | 10/20/11    | S16               | 231                               | ppm          |
| Area C          | 10/20/11    | S17               | 116                               | ppm          |
| Area C          | 10/20/11    | S18               | 581                               | ppm          |
| Area C          | 10/20/11    | S19               | 439                               | ppm          |
| Area C          | 10/21/11    | F7                | 258                               | ppm          |
| Area C          | 10/21/11    | E8                | 560                               | ppm          |
| Area C          | 10/21/11    | A19               | 460                               | ppm          |
| Area C          | 10/21/11    | C17               | 1229                              | ppm          |
| Area C          | 10/21/11    | D19               | 394                               | ppm          |
| Area C          | 10/21/11    | F16               | 866                               | ppm          |
| Area C          | 10/21/11    | F12               | 747                               | ppm          |
| Area C          | 10/21/11    | F11               | 118                               | ppm          |
| Area C          | 10/21/11    | F7                | 645                               | ppm          |
| Area C          | 10/21/11    | H7                | 96                                | ppm          |
| Area C          | 10/21/11    | H8                | 322                               | ppm          |
| Area C          | 10/21/11    | H9                | 164                               | ppm          |
| Area C          | 10/21/11    | H13               | 702                               | ppm          |
| Area C          | 10/21/11    | H19               | 313                               | ppm          |
| Area C          | 10/21/11    | H21               | 287                               | ppm          |
| Area C          | 10/21/11    | I19               | 1387                              | ppm          |
| Area C          | 10/21/11    | G19               | 1499                              | ppm          |
| Area C          | 10/21/11    | K21               | 841                               | ppm          |
| Area C          | 10/21/11    | K20               | 1495                              | ppm          |
| Area C          | 10/21/11    | K19               | 1425                              | ppm          |
| Area C          | 10/21/11    | K17               | 750                               | ppm          |
| Area C          | 10/21/11    | K16               | 993                               | ppm          |
| Area C          | 10/21/11    | J16               | 696                               | ppm          |
| Area C          | 10/21/11    | H14               | 819                               | ppm          |
| Area C          | 10/21/11    | H13               | 601                               | ppm          |
| Area C          | 10/21/11    | H12               | 1247                              | ppm          |
| Area C          | 10/21/11    | K8                | 588                               | ppm          |
| Area C          | 10/21/11    | I8                | 398                               | ppm          |
| Area C          | 10/21/11    | M8                | 1498                              | ppm          |
| Area C          | 10/21/11    | M14               | 1343                              | ppm          |
| Area C          | 10/21/11    | M20               | 714                               | ppm          |
| Area C          | 10/21/11    | Q13               | 249                               | ppm          |
| Area C          | 10/21/11    | Q15               | 975                               | ppm          |
| Area C          | 10/21/11    | Q16               | 950                               | ppm          |
| Area C          | 10/21/11    | Q17               | 395                               | ppm          |
| Area C          | 10/21/11    | Q19               | 2208                              | ppm          |
| Area C          | 10/21/11    | R20               | 208                               | ppm          |
| Area C          | 10/21/11    | R19               | 1388                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/21/11    | R16               | 89                                | ppm          |
| Area C          | 10/21/11    | R15               | 508                               | ppm          |
| Area C          | 10/21/11    | R13               | 1516                              | ppm          |
| Area C          | 10/21/11    | R12               | 247                               | ppm          |
| Area C          | 10/24/11    | A1                | 268                               | ppm          |
| Area C          | 10/24/11    | A2                | 205                               | ppm          |
| Area C          | 10/24/11    | A3                | 280                               | ppm          |
| Area C          | 10/24/11    | A4                | 246                               | ppm          |
| Area C          | 10/24/11    | A5                | 316                               | ppm          |
| Area C          | 10/24/11    | A5                | 814                               | ppm          |
| Area C          | 10/24/11    | A6                | 655                               | ppm          |
| Area C          | 10/24/11    | A7                | 281                               | ppm          |
| Area C          | 10/24/11    | A8                | 366                               | ppm          |
| Area C          | 10/24/11    | A9                | 286                               | ppm          |
| Area C          | 10/24/11    | A10               | 583                               | ppm          |
| Area C          | 10/24/11    | A11               | 1535                              | ppm          |
| Area C          | 10/24/11    | A12               | 475                               | ppm          |
| Area C          | 10/24/11    | A13               | 557                               | ppm          |
| Area C          | 10/24/11    | A14               | 461                               | ppm          |
| Area C          | 10/24/11    | A15               | 254                               | ppm          |
| Area C          | 10/24/11    | A16               | 377                               | ppm          |
| Area C          | 10/24/11    | A17               | 683                               | ppm          |
| Area C          | 10/24/11    | A18               | 454                               | ppm          |
| Area C          | 10/24/11    | A19               | 591                               | ppm          |
| Area C          | 10/24/11    | A20               | 1403                              | ppm          |
| Area C          | 10/24/11    | A21               | 461                               | ppm          |
| Area C          | 10/24/11    | A22               | 1154                              | ppm          |
| Area C          | 10/24/11    | A23               | 428                               | ppm          |
| Area C          | 10/24/11    | A24               | 968                               | ppm          |
| Area C          | 10/24/11    | A24               | 4965                              | ppm          |
| Area C          | 10/24/11    | B1                | 162                               | ppm          |
| Area C          | 10/24/11    | B2                | 165                               | ppm          |
| Area C          | 10/24/11    | B3                | 420                               | ppm          |
| Area C          | 10/24/11    | B4                | 495                               | ppm          |
| Area C          | 10/24/11    | B5                | 399                               | ppm          |
| Area C          | 10/24/11    | B6                | 713                               | ppm          |
| Area C          | 10/24/11    | B7                | 485                               | ppm          |
| Area C          | 10/24/11    | B8                | 402                               | ppm          |
| Area C          | 10/24/11    | B9                | 251                               | ppm          |
| Area C          | 10/24/11    | B10               | 341                               | ppm          |
| Area C          | 10/24/11    | B11               | 275                               | ppm          |
| Area C          | 10/24/11    | B12               | 311                               | ppm          |
| Area C          | 10/24/11    | B13               | 274                               | ppm          |
| Area C          | 10/24/11    | B14               | 313                               | ppm          |
| Area C          | 10/24/11    | B15               | 379                               | ppm          |
| Area C          | 10/24/11    | B16               | 858                               | ppm          |
| Area C          | 10/24/11    | B17               | 617                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/24/11    | B18               | 338                               | ppm          |
| Area C          | 10/24/11    | B19               | 193                               | ppm          |
| Area C          | 10/24/11    | B20               | 528                               | ppm          |
| Area C          | 10/24/11    | B21               | 672                               | ppm          |
| Area C          | 10/24/11    | B22               | 166                               | ppm          |
| Area C          | 10/24/11    | B23               | 230                               | ppm          |
| Area C          | 10/24/11    | B24               | 264                               | ppm          |
| Area C          | 10/24/11    | B25               | 652                               | ppm          |
| Area C          | 10/24/11    | C1                | 225                               | ppm          |
| Area C          | 10/24/11    | C2                | 365                               | ppm          |
| Area C          | 10/24/11    | C3                | 290                               | ppm          |
| Area C          | 10/24/11    | C4                | 574                               | ppm          |
| Area C          | 10/24/11    | C5                | 302                               | ppm          |
| Area C          | 10/24/11    | C6                | 310                               | ppm          |
| Area C          | 10/24/11    | C7                | 487                               | ppm          |
| Area C          | 10/24/11    | C8                | 228                               | ppm          |
| Area C          | 10/24/11    | C9                | 153                               | ppm          |
| Area C          | 10/24/11    | C10               | 308                               | ppm          |
| Area C          | 10/24/11    | A5                | 178                               | ppm          |
| Area C          | 10/24/11    | C11               | 790                               | ppm          |
| Area C          | 10/24/11    | C12               | 517                               | ppm          |
| Area C          | 10/24/11    | C13               | 286                               | ppm          |
| Area C          | 10/24/11    | C14               | 260                               | ppm          |
| Area C          | 10/24/11    | C15               | 256                               | ppm          |
| Area C          | 10/24/11    | C16               | 697                               | ppm          |
| Area C          | 10/24/11    | C17               | 331                               | ppm          |
| Area C          | 10/24/11    | C18               | 639                               | ppm          |
| Area C          | 10/24/11    | C19               | 7863                              | ppm          |
| Area C          | 10/24/11    | C20               | 373                               | ppm          |
| Area C          | 10/24/11    | C21               | 374                               | ppm          |
| Area C          | 10/24/11    | C22               | 1366                              | ppm          |
| Area C          | 10/24/11    | C23               | 595                               | ppm          |
| Area C          | 10/24/11    | C24               | 284                               | ppm          |
| Area C          | 10/24/11    | C25               | 1841                              | ppm          |
| Area C          | 10/24/11    | D1                | 224                               | ppm          |
| Area C          | 10/24/11    | D2                | 1188                              | ppm          |
| Area C          | 10/24/11    | D3                | 258                               | ppm          |
| Area C          | 10/24/11    | D4                | 367                               | ppm          |
| Area C          | 10/24/11    | D5                | 213                               | ppm          |
| Area C          | 10/24/11    | D6                | 250                               | ppm          |
| Area C          | 10/24/11    | D7                | 211                               | ppm          |
| Area C          | 10/24/11    | D8                | 434                               | ppm          |
| Area C          | 10/24/11    | D9                | 305                               | ppm          |
| Area C          | 10/24/11    | D9                | 478                               | ppm          |
| Area C          | 10/24/11    | D11               | 1000                              | ppm          |
| Area C          | 10/24/11    | D8                | 147                               | ppm          |
| Area C          | 10/24/11    | D10               | 168                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/24/11    | D11               | 428                               | ppm          |
| Area C          | 10/24/11    | D11               | 396                               | ppm          |
| Area C          | 10/24/11    | D11               | 574                               | ppm          |
| Area C          | 10/24/11    | D12               | 605                               | ppm          |
| Area C          | 10/24/11    | D13               | 780                               | ppm          |
| Area C          | 10/24/11    | D13               | 762                               | ppm          |
| Area C          | 10/24/11    | D13               | 355                               | ppm          |
| Area C          | 10/24/11    | D14               | 301                               | ppm          |
| Area C          | 10/24/11    | D15               | 541                               | ppm          |
| Area C          | 10/24/11    | D16               | 1126                              | ppm          |
| Area C          | 10/24/11    | D17               | 240                               | ppm          |
| Area C          | 10/24/11    | D18               | 262                               | ppm          |
| Area C          | 10/24/11    | D19               | 663                               | ppm          |
| Area C          | 10/24/11    | D20               | 277                               | ppm          |
| Area C          | 10/24/11    | D21               | 1314                              | ppm          |
| Area C          | 10/24/11    | D21               | 689                               | ppm          |
| Area C          | 10/24/11    | D22               | 614                               | ppm          |
| Area C          | 10/24/11    | D23               | 324                               | ppm          |
| Area C          | 10/24/11    | D24               | 178                               | ppm          |
| Area C          | 10/24/11    | D25               | 335                               | ppm          |
| Area C          | 10/24/11    | D19               | 666                               | ppm          |
| Area C          | 10/24/11    | D19               | 239                               | ppm          |
| Area C          | 10/24/11    | D21               | 966                               | ppm          |
| Area C          | 10/24/11    | D18               | 535                               | ppm          |
| Area C          | 10/24/11    | D22               | 228                               | ppm          |
| Area C          | 10/24/11    | D21               | 1098                              | ppm          |
| Area C          | 10/24/11    | D21               | 1941                              | ppm          |
| Area C          | 10/24/11    | D16               | 462                               | ppm          |
| Area C          | 10/24/11    | D21               | 506                               | ppm          |
| Area C          | 10/24/11    | D16               | 333                               | ppm          |
| Area C          | 10/24/11    | D16               | 313                               | ppm          |
| Area C          | 10/24/11    | D11               | 606                               | ppm          |
| Area C          | 10/24/11    | D11               | 670                               | ppm          |
| Area C          | 10/24/11    | D12               | 1678                              | ppm          |
| Area C          | 10/24/11    | D13               | 298                               | ppm          |
| Area C          | 10/24/11    | D15               | 1383                              | ppm          |
| Area C          | 10/24/11    | D21               | 1210                              | ppm          |
| Area C          | 10/24/11    | D01               | 397                               | ppm          |
| Area C          | 10/24/11    | D02               | 405                               | ppm          |
| Area C          | 10/24/11    | D02               | 321                               | ppm          |
| Area C          | 10/24/11    | D03               | 287                               | ppm          |
| Area C          | 10/24/11    | D04               | 433                               | ppm          |
| Area C          | 10/24/11    | D05               | 300                               | ppm          |
| Area C          | 10/24/11    | D06               | 403                               | ppm          |
| Area C          | 10/24/11    | D07               | 409                               | ppm          |
| Area C          | 10/24/11    | D08               | 194                               | ppm          |
| Area C          | 10/24/11    | D09               | 312                               | ppm          |



**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/24/11    | D10               | 365                               | ppm          |
| Area C          | 10/24/11    | D11               | 425                               | ppm          |
| Area C          | 10/24/11    | D12               | 340                               | ppm          |
| Area C          | 10/24/11    | D13               | 379                               | ppm          |
| Area C          | 10/24/11    | D14               | 265                               | ppm          |
| Area C          | 10/24/11    | E15               | 270                               | ppm          |
| Area C          | 10/24/11    | E16               | 243                               | ppm          |
| Area C          | 10/24/11    | E17               | 310                               | ppm          |
| Area C          | 10/24/11    | E17               | 403                               | ppm          |
| Area C          | 10/24/11    | E18               | 318                               | ppm          |
| Area C          | 10/24/11    | E18               | 475                               | ppm          |
| Area C          | 10/24/11    | E18               | 433                               | ppm          |
| Area C          | 10/24/11    | E19               | 276                               | ppm          |
| Area C          | 10/24/11    | E20               | 758                               | ppm          |
| Area C          | 10/24/11    | E21               | 349                               | ppm          |
| Area C          | 10/24/11    | E22               | 274                               | ppm          |
| Area C          | 10/24/11    | E24               | 373                               | ppm          |
| Area C          | 10/24/11    | E24               | 576                               | ppm          |
| Area C          | 10/24/11    | E25               | 9931                              | ppm          |
| Area C          | 10/24/11    | E25               | 1469                              | ppm          |
| Area C          | 10/24/11    | F1                | 224                               | ppm          |
| Area C          | 10/24/11    | F1                | 349                               | ppm          |
| Area C          | 10/24/11    | F2                | < LOD                             | ppm          |
| Area C          | 10/24/11    | F2                | 405                               | ppm          |
| Area C          | 10/24/11    | F3                | 346                               | ppm          |
| Area C          | 10/24/11    | F4                | 191                               | ppm          |
| Area C          | 10/24/11    | F5                | 453                               | ppm          |
| Area C          | 10/24/11    | F6                | 384                               | ppm          |
| Area C          | 10/24/11    | F7                | 213                               | ppm          |
| Area C          | 10/24/11    | F8                | 152                               | ppm          |
| Area C          | 10/24/11    | F9                | 228                               | ppm          |
| Area C          | 10/24/11    | F10               | 1062                              | ppm          |
| Area C          | 10/24/11    | F11               | 361                               | ppm          |
| Area C          | 10/24/11    | F12               | 224                               | ppm          |
| Area C          | 10/24/11    | F13               | 238                               | ppm          |
| Area C          | 10/24/11    | F14               | 459                               | ppm          |
| Area C          | 10/24/11    | F15               | 205                               | ppm          |
| Area C          | 10/24/11    | F16               | 710                               | ppm          |
| Area C          | 10/24/11    | F17               | 339                               | ppm          |
| Area C          | 10/24/11    | F18               | 254                               | ppm          |
| Area C          | 10/24/11    | F19               | 873                               | ppm          |
| Area C          | 10/24/11    | F20               | 367                               | ppm          |
| Area C          | 10/24/11    | F21               | 294                               | ppm          |
| Area C          | 10/24/11    | F22               | 185                               | ppm          |
| Area C          | 10/24/11    | F23               | 283                               | ppm          |
| Area C          | 10/24/11    | F24               | 223                               | ppm          |
| Area C          | 10/24/11    | F25               | 394                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/24/11    | G1                | 166                               | ppm          |
| Area C          | 10/24/11    | G2                | 285                               | ppm          |
| Area C          | 10/24/11    | G3                | 497                               | ppm          |
| Area C          | 10/24/11    | G4                | 282                               | ppm          |
| Area C          | 10/24/11    | G5                | 382                               | ppm          |
| Area C          | 10/24/11    | G6                | 432                               | ppm          |
| Area C          | 10/24/11    | G7                | 304                               | ppm          |
| Area C          | 10/24/11    | G8                | 161                               | ppm          |
| Area C          | 10/24/11    | G9                | 318                               | ppm          |
| Area C          | 10/24/11    | G10               | 601                               | ppm          |
| Area C          | 10/24/11    | G11               | 365                               | ppm          |
| Area C          | 10/24/11    | G12               | 453                               | ppm          |
| Area C          | 10/24/11    | G13               | 322                               | ppm          |
| Area C          | 10/24/11    | G14               | 295                               | ppm          |
| Area C          | 10/24/11    | G15               | 292                               | ppm          |
| Area C          | 10/24/11    | G16               | 176                               | ppm          |
| Area C          | 10/24/11    | G17               | 2554                              | ppm          |
| Area C          | 10/24/11    | G18               | 310                               | ppm          |
| Area C          | 10/24/11    | G19               | 524                               | ppm          |
| Area C          | 10/24/11    | G20               | 456                               | ppm          |
| Area C          | 10/24/11    | G21               | 231                               | ppm          |
| Area C          | 10/24/11    | G22               | 347                               | ppm          |
| Area C          | 10/24/11    | G23               | 328                               | ppm          |
| Area C          | 10/24/11    | G24               | 186                               | ppm          |
| Area C          | 10/24/11    | G25               | 771                               | ppm          |
| Area C          | 10/24/11    | H1                | 150                               | ppm          |
| Area C          | 10/24/11    | H1                | 168                               | ppm          |
| Area C          | 10/24/11    | H2                | 438                               | ppm          |
| Area C          | 10/24/11    | H3                | 247                               | ppm          |
| Area C          | 10/24/11    | H4                | 504                               | ppm          |
| Area C          | 10/24/11    | H4                | 313                               | ppm          |
| Area C          | 10/24/11    | H5                | 209                               | ppm          |
| Area C          | 10/24/11    | H6                | 695                               | ppm          |
| Area C          | 10/24/11    | H7                | 938                               | ppm          |
| Area C          | 10/24/11    | H8                | 95                                | ppm          |
| Area C          | 10/24/11    | H9                | 202                               | ppm          |
| Area C          | 10/24/11    | H10               | 201                               | ppm          |
| Area C          | 10/24/11    | H11               | 301                               | ppm          |
| Area C          | 10/24/11    | H12               | 585                               | ppm          |
| Area C          | 10/24/11    | H11               | 435                               | ppm          |
| Area C          | 10/24/11    | H12               | 397                               | ppm          |
| Area C          | 10/24/11    | H12               | 376                               | ppm          |
| Area C          | 10/24/11    | H11               | 355                               | ppm          |
| Area C          | 10/24/11    | H13               | 263                               | ppm          |
| Area C          | 10/24/11    | H14               | 534                               | ppm          |
| Area C          | 10/24/11    | H14               | 321                               | ppm          |
| Area C          | 10/24/11    | H15               | 837                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/24/11    | H15               | 277                               | ppm          |
| Area C          | 10/24/11    | H15               | 293                               | ppm          |
| Area C          | 10/24/11    | H17               | 132                               | ppm          |
| Area C          | 10/24/11    | H18               | 348                               | ppm          |
| Area C          | 10/24/11    | H19               | 887                               | ppm          |
| Area C          | 10/24/11    | H19               | 421                               | ppm          |
| Area C          | 10/24/11    | S20               | 158                               | ppm          |
| Area C          | 10/24/11    | H21               | 393                               | ppm          |
| Area C          | 10/24/11    | H22               | 234                               | ppm          |
| Area C          | 10/24/11    | H23               | 285                               | ppm          |
| Area C          | 10/24/11    | H24               | 131                               | ppm          |
| Area C          | 10/24/11    | H25               | 371                               | ppm          |
| Area C          | 10/24/11    | I1                | 584                               | ppm          |
| Area C          | 10/24/11    | I1                | 527                               | ppm          |
| Area C          | 10/24/11    | I2                | 620                               | ppm          |
| Area C          | 10/24/11    | I2                | 587                               | ppm          |
| Area C          | 10/24/11    | I2                | 375                               | ppm          |
| Area C          | 10/24/11    | I3                | 323                               | ppm          |
| Area C          | 10/24/11    | I4                | 813                               | ppm          |
| Area C          | 10/24/11    | I4                | 588                               | ppm          |
| Area C          | 10/24/11    | I6                | 425                               | ppm          |
| Area C          | 10/24/11    | I7                | 355                               | ppm          |
| Area C          | 10/24/11    | I8                | 1270                              | ppm          |
| Area C          | 10/24/11    | I8                | 1985                              | ppm          |
| Area C          | 10/24/11    | I9                | 590                               | ppm          |
| Area C          | 10/24/11    | I9                | 802                               | ppm          |
| Area C          | 10/24/11    | I10               | 255                               | ppm          |
| Area C          | 10/24/11    | I10               | 259                               | ppm          |
| Area C          | 10/24/11    | I11               | 171                               | ppm          |
| Area C          | 10/24/11    | I12               | 274                               | ppm          |
| Area C          | 10/24/11    | I13               | 248                               | ppm          |
| Area C          | 10/24/11    | I14               | 278                               | ppm          |
| Area C          | 10/24/11    | I15               | 520                               | ppm          |
| Area C          | 10/24/11    | I15               | 572                               | ppm          |
| Area C          | 10/24/11    | I16               | 532                               | ppm          |
| Area C          | 10/24/11    | I16               | 304                               | ppm          |
| Area C          | 10/24/11    | I17               | 223                               | ppm          |
| Area C          | 10/24/11    | I18               | 515                               | ppm          |
| Area C          | 10/24/11    | I18               | 466                               | ppm          |
| Area C          | 10/24/11    | I19               | 770                               | ppm          |
| Area C          | 10/24/11    | I20               | 651                               | ppm          |
| Area C          | 10/24/11    | I21               | 321                               | ppm          |
| Area C          | 10/24/11    | I22               | 312                               | ppm          |
| Area C          | 10/24/11    | I23               | 382                               | ppm          |
| Area C          | 10/24/11    | I23               | 510                               | ppm          |
| Area C          | 10/24/11    | I24               | 218                               | ppm          |
| Area C          | 10/24/11    | I25               | 494                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/24/11    | I25               | 278                               | ppm          |
| Area C          | 10/24/11    | I1                | 450                               | ppm          |
| Area C          | 10/24/11    | I1                | 561                               | ppm          |
| Area C          | 10/24/11    | I4                | 527                               | ppm          |
| Area C          | 10/24/11    | I4                | 247                               | ppm          |
| Area C          | 10/24/11    | I1                | 466                               | ppm          |
| Area C          | 10/24/11    | I1                | 514                               | ppm          |
| Area C          | 10/24/11    | I1                | 281                               | ppm          |
| Area C          | 10/24/11    | I5                | 437                               | ppm          |
| Area C          | 10/24/11    | I5                | 234                               | ppm          |
| Area C          | 10/24/11    | I6                | 146                               | ppm          |
| Area C          | 10/24/11    | I8                | 780                               | ppm          |
| Area C          | 10/24/11    | I8                | 2485                              | ppm          |
| Area C          | 10/24/11    | I8                | 2588                              | ppm          |
| Area C          | 10/24/11    | I9                | 312                               | ppm          |
| Area C          | 10/24/11    | I9                | 335                               | ppm          |
| Area C          | 10/24/11    | I15               | 129                               | ppm          |
| Area C          | 10/24/11    | I15               | 118                               | ppm          |
| Area C          | 10/24/11    | I18               | 116                               | ppm          |
| Area C          | 10/24/11    | I19               | 943                               | ppm          |
| Area C          | 10/24/11    | I19               | 335                               | ppm          |
| Area C          | 10/24/11    | I20               | 470                               | ppm          |
| Area C          | 10/24/11    | I20               | 301                               | ppm          |
| Area C          | 10/24/11    | H8                | 430                               | ppm          |
| Area C          | 10/24/11    | H8                | 366                               | ppm          |
| Area C          | 10/24/11    | I8                | 1079                              | ppm          |
| Area C          | 10/24/11    | I8                | 459                               | ppm          |
| Area C          | 10/24/11    | I8                | 558                               | ppm          |
| Area C          | 10/24/11    | I8                | 324                               | ppm          |
| Area C          | 10/24/11    | I23               | 256                               | ppm          |
| Area C          | 10/24/11    | J1                | 342                               | ppm          |
| Area C          | 10/24/11    | J2                | 592                               | ppm          |
| Area C          | 10/24/11    | J2                | 390                               | ppm          |
| Area C          | 10/24/11    | J3                | 402                               | ppm          |
| Area C          | 10/24/11    | J3                | 845                               | ppm          |
| Area C          | 10/24/11    | J4                | 395                               | ppm          |
| Area C          | 10/24/11    | J4                | 734                               | ppm          |
| Area C          | 10/24/11    | J4                | 160                               | ppm          |
| Area C          | 10/24/11    | J2                | 242                               | ppm          |
| Area C          | 10/24/11    | J3                | 195                               | ppm          |
| Area C          | 10/24/11    | J7                | 226                               | ppm          |
| Area C          | 10/24/11    | J8                | 594                               | ppm          |
| Area C          | 10/24/11    | J8                | 443                               | ppm          |
| Area C          | 10/24/11    | J5                | 385                               | ppm          |
| Area C          | 10/24/11    | J5                | 478                               | ppm          |
| Area C          | 10/24/11    | J5                | 227                               | ppm          |
| Area C          | 10/24/11    | J6                | 191                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/24/11    | J8                | 790                               | ppm          |
| Area C          | 10/24/11    | J8                | 1133                              | ppm          |
| Area C          | 10/24/11    | J8                | 840                               | ppm          |
| Area C          | 10/24/11    | J9                | 1121                              | ppm          |
| Area C          | 10/24/11    | J10               | 647                               | ppm          |
| Area C          | 10/24/11    | J10               | 406                               | ppm          |
| Area C          | 10/24/11    | J10               | 325                               | ppm          |
| Area C          | 10/24/11    | J11               | 500                               | ppm          |
| Area C          | 10/24/11    | J11               | 528                               | ppm          |
| Area C          | 10/24/11    | J12               | 536                               | ppm          |
| Area C          | 10/24/11    | J12               | 632                               | ppm          |
| Area C          | 10/24/11    | J12               | 1008                              | ppm          |
| Area C          | 10/24/11    | J13               | 780                               | ppm          |
| Area C          | 10/24/11    | J14               | 476                               | ppm          |
| Area C          | 10/24/11    | J14               | 1291                              | ppm          |
| Area C          | 10/24/11    | J15               | 342                               | ppm          |
| Area C          | 10/24/11    | J16               | 273                               | ppm          |
| Area C          | 10/24/11    | J17               | 802                               | ppm          |
| Area C          | 10/24/11    | J17               | 287                               | ppm          |
| Area C          | 10/24/11    | J18               | 384                               | ppm          |
| Area C          | 10/24/11    | J18               | 1249                              | ppm          |
| Area C          | 10/24/11    | J18               | 1767                              | ppm          |
| Area C          | 10/24/11    | J19               | 728                               | ppm          |
| Area C          | 10/24/11    | J19               | 173                               | ppm          |
| Area C          | 10/24/11    | J20               | 548                               | ppm          |
| Area C          | 10/24/11    | J20               | 978                               | ppm          |
| Area C          | 10/24/11    | J20               | 282                               | ppm          |
| Area C          | 10/24/11    | J21               | 228                               | ppm          |
| Area C          | 10/25/11    | J22               | 420                               | ppm          |
| Area C          | 10/25/11    | J22               | 560                               | ppm          |
| Area C          | 10/25/11    | J22               | 454                               | ppm          |
| Area C          | 10/25/11    | J23               | 238                               | ppm          |
| Area C          | 10/25/11    | J24               | 278                               | ppm          |
| Area C          | 10/25/11    | J25               | 1527                              | ppm          |
| Area C          | 10/25/11    | J25               | 281                               | ppm          |
| Area C          | 10/25/11    | J22               | 147                               | ppm          |
| Area C          | 10/25/11    | J18               | 301                               | ppm          |
| Area C          | 10/25/11    | J14               | 611                               | ppm          |
| Area C          | 10/25/11    | J14               | 253                               | ppm          |
| Area C          | 10/25/11    | J13               | 390                               | ppm          |
| Area C          | 10/25/11    | J13               | 315                               | ppm          |
| Area C          | 10/25/11    | J12               | 822                               | ppm          |
| Area C          | 10/25/11    | J12               | 595                               | ppm          |
| Area C          | 10/25/11    | J12               | 1104                              | ppm          |
| Area C          | 10/25/11    | J12               | 299                               | ppm          |
| Area C          | 10/25/11    | J11               | 279                               | ppm          |
| Area C          | 10/25/11    | J9                | 522                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/25/11    | J9                | 802                               | ppm          |
| Area C          | 10/25/11    | J9                | 370                               | ppm          |
| Area C          | 10/25/11    | J9                | 252                               | ppm          |
| Area C          | 10/25/11    | J8                | 547                               | ppm          |
| Area C          | 10/25/11    | J8                | 1618                              | ppm          |
| Area C          | 10/25/11    | J8                | 207                               | ppm          |
| Area C          | 10/25/11    | K1                | 804                               | ppm          |
| Area C          | 10/25/11    | K1                | 1409                              | ppm          |
| Area C          | 10/25/11    | K2                | 383                               | ppm          |
| Area C          | 10/25/11    | K2                | 393                               | ppm          |
| Area C          | 10/25/11    | K2                | 495                               | ppm          |
| Area C          | 10/25/11    | K1                | 794                               | ppm          |
| Area C          | 10/25/11    | K1                | 3466                              | ppm          |
| Area C          | 10/25/11    | K1                | 3560                              | ppm          |
| Area C          | 10/25/11    | K2                | 466                               | ppm          |
| Area C          | 10/25/11    | K3                | 544                               | ppm          |
| Area C          | 10/25/11    | K3                | 710                               | ppm          |
| Area C          | 10/25/11    | K4                | 1777                              | ppm          |
| Area C          | 10/25/11    | K4                | 661                               | ppm          |
| Area C          | 10/25/11    | K4                | 1782                              | ppm          |
| Area C          | 10/25/11    | K5                | 1049                              | ppm          |
| Area C          | 10/25/11    | K5                | 913                               | ppm          |
| Area C          | 10/25/11    | K6                | 1782                              | ppm          |
| Area C          | 10/25/11    | K6                | 1455                              | ppm          |
| Area C          | 10/25/11    | K6                | 1348                              | ppm          |
| Area C          | 10/25/11    | K1                | 746                               | ppm          |
| Area C          | 10/25/11    | K1                | 678                               | ppm          |
| Area C          | 10/25/11    | K1                | 612                               | ppm          |
| Area C          | 10/25/11    | K1                | 242                               | ppm          |
| Area C          | 10/25/11    | K2                | 695                               | ppm          |
| Area C          | 10/25/11    | K2                | 464                               | ppm          |
| Area C          | 10/25/11    | K2                | 298                               | ppm          |
| Area C          | 10/25/11    | K3                | 244                               | ppm          |
| Area C          | 10/25/11    | K4                | 663                               | ppm          |
| Area C          | 10/25/11    | K4                | 1114                              | ppm          |
| Area C          | 10/25/11    | K4                | 450                               | ppm          |
| Area C          | 10/25/11    | K4                | 595                               | ppm          |
| Area C          | 10/25/11    | K4                | 1778                              | ppm          |
| Area C          | 10/25/11    | K4                | 1202                              | ppm          |
| Area C          | 10/25/11    | K5                | 1472                              | ppm          |
| Area C          | 10/25/11    | K5                | 1742                              | ppm          |
| Area C          | 10/25/11    | K5                | 1388                              | ppm          |
| Area C          | 10/25/11    | K5                | 1005                              | ppm          |
| Area C          | 10/25/11    | K5                | 1493                              | ppm          |
| Area C          | 10/25/11    | K5                | 1756                              | ppm          |
| Area C          | 10/25/11    | K5                | 2024                              | ppm          |
| Area C          | 10/25/11    | K5                | 971                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/25/11    | K5                | 864                               | ppm          |
| Area C          | 10/25/11    | K5                | 842                               | ppm          |
| Area C          | 10/25/11    | K5                | 1518                              | ppm          |
| Area C          | 10/25/11    | K5                | 633                               | ppm          |
| Area C          | 10/25/11    | K5                | 751                               | ppm          |
| Area C          | 10/25/11    | K6                | 961                               | ppm          |
| Area C          | 10/25/11    | K6                | 796                               | ppm          |
| Area C          | 10/25/11    | K6                | 882                               | ppm          |
| Area C          | 10/25/11    | K6                | 1542                              | ppm          |
| Area C          | 10/25/11    | K6                | 623                               | ppm          |
| Area C          | 10/25/11    | K6                | 514                               | ppm          |
| Area C          | 10/25/11    | K6                | 1203                              | ppm          |
| Area C          | 10/25/11    | K6                | 336                               | ppm          |
| Area C          | 10/25/11    | K8                | 734                               | ppm          |
| Area C          | 10/25/11    | K8                | 745                               | ppm          |
| Area C          | 10/25/11    | K8                | 1589                              | ppm          |
| Area C          | 10/25/11    | K8                | 484                               | ppm          |
| Area C          | 10/25/11    | K8                | 673                               | ppm          |
| Area C          | 10/25/11    | K8                | 1103                              | ppm          |
| Area C          | 10/25/11    | K8                | 849                               | ppm          |
| Area C          | 10/25/11    | K8                | 480                               | ppm          |
| Area C          | 10/25/11    | K8                | 2637                              | ppm          |
| Area C          | 10/25/11    | K8                | 812                               | ppm          |
| Area C          | 10/25/11    | K8                | 540                               | ppm          |
| Area C          | 10/25/11    | K4                | 572                               | ppm          |
| Area C          | 10/25/11    | K5                | 661                               | ppm          |
| Area C          | 10/25/11    | K6                | 246                               | ppm          |
| Area C          | 10/25/11    | K7                | 968                               | ppm          |
| Area C          | 10/25/11    | K8                | 1009                              | ppm          |
| Area C          | 10/25/11    | K9                | 688                               | ppm          |
| Area C          | 10/25/11    | K9b10             | 673                               | ppm          |
| Area C          | 10/25/11    | K9b11             | 424                               | ppm          |
| Area C          | 10/25/11    | K9b12             | 1430                              | ppm          |
| Area C          | 10/25/11    | K9b13             | 665                               | ppm          |
| Area C          | 10/25/11    | K9b14             | 595                               | ppm          |
| Area C          | 10/25/11    | K15               | 668                               | ppm          |
| Area C          | 10/25/11    | K16               | 1494                              | ppm          |
| Area C          | 10/25/11    | K17               | 1211                              | ppm          |
| Area C          | 10/25/11    | K18               | 848                               | ppm          |
| Area C          | 10/25/11    | K18               | 1901                              | ppm          |
| Area C          | 10/25/11    | K19               | 1249                              | ppm          |
| Area C          | 10/25/11    | K20               | 566                               | ppm          |
| Area C          | 10/25/11    | K21               | 717                               | ppm          |
| Area C          | 10/25/11    | K22               | 1008                              | ppm          |
| Area C          | 10/25/11    | K23               | 849                               | ppm          |
| Area C          | 10/25/11    | K24               | 745                               | ppm          |
| Area C          | 10/25/11    | K24               | 2081                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/25/11    | K25               | 1932                              | ppm          |
| Area C          | 10/25/11    | L1                | 758                               | ppm          |
| Area C          | 10/25/11    | L1                | 740                               | ppm          |
| Area C          | 10/25/11    | L2                | 1019                              | ppm          |
| Area C          | 10/25/11    | L3                | 565                               | ppm          |
| Area C          | 10/25/11    | L4                | 1217                              | ppm          |
| Area C          | 10/25/11    | L5                | 1011                              | ppm          |
| Area C          | 10/25/11    | L6                | 1416                              | ppm          |
| Area C          | 10/25/11    | L7                | 1360                              | ppm          |
| Area C          | 10/25/11    | L8                | 261                               | ppm          |
| Area C          | 10/25/11    | L9                | 402                               | ppm          |
| Area C          | 10/25/11    | L11               | 599                               | ppm          |
| Area C          | 10/25/11    | L12               | 893                               | ppm          |
| Area C          | 10/25/11    | L13               | 789                               | ppm          |
| Area C          | 10/25/11    | L14               | 249                               | ppm          |
| Area C          | 10/25/11    | L15               | 182                               | ppm          |
| Area C          | 10/25/11    | L16               | 1353                              | ppm          |
| Area C          | 10/25/11    | L16               | 746                               | ppm          |
| Area C          | 10/25/11    | L16               | 1702                              | ppm          |
| Area C          | 10/25/11    | L17               | 551                               | ppm          |
| Area C          | 10/25/11    | L18               | 810                               | ppm          |
| Area C          | 10/25/11    | L19               | 903                               | ppm          |
| Area C          | 10/25/11    | L20               | 460                               | ppm          |
| Area C          | 10/25/11    | L21               | 1206                              | ppm          |
| Area C          | 10/25/11    | L22               | 3844                              | ppm          |
| Area C          | 10/25/11    | L22               | 1665                              | ppm          |
| Area C          | 10/25/11    | L23               | 2158                              | ppm          |
| Area C          | 10/25/11    | L24               | 1881                              | ppm          |
| Area C          | 10/25/11    | L24               | 2868                              | ppm          |
| Area C          | 10/25/11    | M1                | 1783                              | ppm          |
| Area C          | 10/25/11    | M2                | 884                               | ppm          |
| Area C          | 10/25/11    | M2                | 712                               | ppm          |
| Area C          | 10/25/11    | M4                | 752                               | ppm          |
| Area C          | 10/25/11    | M5                | 1503                              | ppm          |
| Area C          | 10/25/11    | M6                | 2506                              | ppm          |
| Area C          | 10/25/11    | M7                | 2570                              | ppm          |
| Area C          | 10/25/11    | M8                | 1016                              | ppm          |
| Area C          | 10/25/11    | M9                | 385                               | ppm          |
| Area C          | 10/25/11    | M10               | 529                               | ppm          |
| Area C          | 10/25/11    | M11               | 639                               | ppm          |
| Area C          | 10/25/11    | M12               | 902                               | ppm          |
| Area C          | 10/25/11    | M13               | 2636                              | ppm          |
| Area C          | 10/25/11    | M14               | 853                               | ppm          |
| Area C          | 10/25/11    | M15               | 387                               | ppm          |
| Area C          | 10/25/11    | M15               | 641                               | ppm          |
| Area C          | 10/25/11    | M15               | 827                               | ppm          |
| Area C          | 10/25/11    | M15               | 655                               | ppm          |



**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/25/11    | M16               | 749                               | ppm          |
| Area C          | 10/25/11    | M16               | 553                               | ppm          |
| Area C          | 10/25/11    | M16               | 584                               | ppm          |
| Area C          | 10/25/11    | M17               | 516                               | ppm          |
| Area C          | 10/25/11    | M18               | 313                               | ppm          |
| Area C          | 10/25/11    | M19               | 244                               | ppm          |
| Area C          | 10/25/11    | M20               | 739                               | ppm          |
| Area C          | 10/25/11    | M20               | 778                               | ppm          |
| Area C          | 10/25/11    | M21               | 2169                              | ppm          |
| Area C          | 10/25/11    | M21               | 1187                              | ppm          |
| Area C          | 10/25/11    | M22               | 2255                              | ppm          |
| Area C          | 10/25/11    | M22               | 3632                              | ppm          |
| Area C          | 10/25/11    | M22               | 2271                              | ppm          |
| Area C          | 10/25/11    | M23               | 4623                              | ppm          |
| Area C          | 10/25/11    | M23               | 3350                              | ppm          |
| Area C          | 10/25/11    | M23               | 1420                              | ppm          |
| Area C          | 10/25/11    | M20               | 455                               | ppm          |
| Area C          | 10/25/11    | M21               | 435                               | ppm          |
| Area C          | 10/25/11    | M22               | 2083                              | ppm          |
| Area C          | 10/25/11    | M22               | 1237                              | ppm          |
| Area C          | 10/25/11    | M22               | 1588                              | ppm          |
| Area C          | 10/25/11    | M22               | 3117                              | ppm          |
| Area C          | 10/25/11    | M22               | 1572                              | ppm          |
| Area C          | 10/25/11    | M24               | 1352                              | ppm          |
| Area C          | 10/25/11    | M25               | 5019                              | ppm          |
| Area C          | 10/25/11    | M25               | 5025                              | ppm          |
| Area C          | 10/25/11    | N25               | 3427                              | ppm          |
| Area C          | 10/25/11    | N24               | 3573                              | ppm          |
| Area C          | 10/25/11    | N24               | 767                               | ppm          |
| Area C          | 10/25/11    | N23               | 1116                              | ppm          |
| Area C          | 10/25/11    | N23               | 1593                              | ppm          |
| Area C          | 10/25/11    | N22               | 4462                              | ppm          |
| Area C          | 10/25/11    | N22               | 3877                              | ppm          |
| Area C          | 10/25/11    | N22               | 4314                              | ppm          |
| Area C          | 10/25/11    | N21               | 2849                              | ppm          |
| Area C          | 10/25/11    | N21               | 2003                              | ppm          |
| Area C          | 10/25/11    | N21               | 481                               | ppm          |
| Area C          | 10/25/11    | N20               | 538                               | ppm          |
| Area C          | 10/25/11    | N19               | 148                               | ppm          |
| Area C          | 10/25/11    | N18               | 134                               | ppm          |
| Area C          | 10/25/11    | N17               | 252                               | ppm          |
| Area C          | 10/25/11    | N16               | 1928                              | ppm          |
| Area C          | 10/25/11    | N16               | 1203                              | ppm          |
| Area C          | 10/25/11    | N16               | 325                               | ppm          |
| Area C          | 10/25/11    | N15               | 793                               | ppm          |
| Area C          | 10/25/11    | N15               | 896                               | ppm          |
| Area C          | 10/25/11    | N14               | 223                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/25/11    | N13               | 591                               | ppm          |
| Area C          | 10/25/11    | N13               | 306                               | ppm          |
| Area C          | 10/25/11    | N12               | 297                               | ppm          |
| Area C          | 10/25/11    | N11               | 207                               | ppm          |
| Area C          | 10/25/11    | N10               | 596                               | ppm          |
| Area C          | 10/25/11    | N10               | 462                               | ppm          |
| Area C          | 10/25/11    | N9                | 735                               | ppm          |
| Area C          | 10/25/11    | N9                | 471                               | ppm          |
| Area C          | 10/25/11    | N8                | 378                               | ppm          |
| Area C          | 10/25/11    | N8                | 830                               | ppm          |
| Area C          | 10/25/11    | N8                | 855                               | ppm          |
| Area C          | 10/25/11    | N8                | 767                               | ppm          |
| Area C          | 10/25/11    | N8                | 1165                              | ppm          |
| Area C          | 10/25/11    | N7                | 3301                              | ppm          |
| Area C          | 10/25/11    | N7                | 1676                              | ppm          |
| Area C          | 10/25/11    | N6                | 5918                              | ppm          |
| Area C          | 10/25/11    | N6                | 5512                              | ppm          |
| Area C          | 10/25/11    | N6                | 4666                              | ppm          |
| Area C          | 10/25/11    | N6                | 2097                              | ppm          |
| Area C          | 10/25/11    | N5                | 1796                              | ppm          |
| Area C          | 10/25/11    | N5                | 2067                              | ppm          |
| Area C          | 10/25/11    | N5                | 2814                              | ppm          |
| Area C          | 10/25/11    | N5                | 2062                              | ppm          |
| Area C          | 10/25/11    | N4                | 1439                              | ppm          |
| Area C          | 10/25/11    | N4                | 1304                              | ppm          |
| Area C          | 10/25/11    | N3                | 992                               | ppm          |
| Area C          | 10/25/11    | N3                | 1794                              | ppm          |
| Area C          | 10/25/11    | N2                | 374                               | ppm          |
| Area C          | 10/25/11    | N2                | 669                               | ppm          |
| Area C          | 10/25/11    | N2                | 527                               | ppm          |
| Area C          | 10/25/11    | N1                | 587                               | ppm          |
| Area C          | 10/25/11    | O1                | 480                               | ppm          |
| Area C          | 10/25/11    | O2                | 505                               | ppm          |
| Area C          | 10/25/11    | O3                | 860                               | ppm          |
| Area C          | 10/25/11    | O3                | 870                               | ppm          |
| Area C          | 10/25/11    | O4                | 1478                              | ppm          |
| Area C          | 10/25/11    | O4                | 600                               | ppm          |
| Area C          | 10/25/11    | O5                | 2067                              | ppm          |
| Area C          | 10/25/11    | O5                | 2771                              | ppm          |
| Area C          | 10/25/11    | O5                | 1978                              | ppm          |
| Area C          | 10/25/11    | O5                | 2600                              | ppm          |
| Area C          | 10/25/11    | O5                | 2594                              | ppm          |
| Area C          | 10/25/11    | O6                | 2378                              | ppm          |
| Area C          | 10/25/11    | O6                | 3594                              | ppm          |
| Area C          | 10/25/11    | O6                | 3970                              | ppm          |
| Area C          | 10/25/11    | O6                | 1897                              | ppm          |
| Area C          | 10/25/11    | O7                | 672                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/25/11    | O7                | 870                               | ppm          |
| Area C          | 10/25/11    | O8                | 311                               | ppm          |
| Area C          | 10/25/11    | O9                | 196                               | ppm          |
| Area C          | 10/25/11    | O10               | 213                               | ppm          |
| Area C          | 10/25/11    | O11               | 327                               | ppm          |
| Area C          | 10/25/11    | O12               | 218                               | ppm          |
| Area C          | 10/25/11    | O13               | 162                               | ppm          |
| Area C          | 10/25/11    | O14               | 194                               | ppm          |
| Area C          | 10/25/11    | O15               | 304                               | ppm          |
| Area C          | 10/25/11    | O16               | 273                               | ppm          |
| Area C          | 10/25/11    | O17               | 274                               | ppm          |
| Area C          | 10/25/11    | O18               | 313                               | ppm          |
| Area C          | 10/25/11    | O19               | 478                               | ppm          |
| Area C          | 10/25/11    | O19               | 245                               | ppm          |
| Area C          | 10/25/11    | O20               | 441                               | ppm          |
| Area C          | 10/25/11    | O20               | 289                               | ppm          |
| Area C          | 10/25/11    | O21               | 3877                              | ppm          |
| Area C          | 10/25/11    | O21               | 2432                              | ppm          |
| Area C          | 10/25/11    | O21               | 405                               | ppm          |
| Area C          | 10/25/11    | O22               | 1895                              | ppm          |
| Area C          | 10/25/11    | O22               | 3568                              | ppm          |
| Area C          | 10/25/11    | O22               | 3317                              | ppm          |
| Area C          | 10/25/11    | O22               | 4243                              | ppm          |
| Area C          | 10/25/11    | O22               | 3038                              | ppm          |
| Area C          | 10/25/11    | O22               | 2493                              | ppm          |
| Area C          | 10/25/11    | O22               | 2959                              | ppm          |
| Area C          | 10/25/11    | O22               | 5610                              | ppm          |
| Area C          | 10/25/11    | O22               | 3262                              | ppm          |
| Area C          | 10/25/11    | O22               | 3843                              | ppm          |
| Area C          | 10/25/11    | O22               | 3251                              | ppm          |
| Area C          | 10/25/11    | O22               | 2535                              | ppm          |
| Area C          | 10/25/11    | O23               | 2804                              | ppm          |
| Area C          | 10/25/11    | O24               | 9076                              | ppm          |
| Area C          | 10/25/11    | O24               | 5194                              | ppm          |
| Area C          | 10/25/11    | O24               | 5244                              | ppm          |
| Area C          | 10/25/11    | O24               | 1148                              | ppm          |
| Area C          | 10/25/11    | O25               | 3821                              | ppm          |
| Area C          | 10/25/11    | P25               | 2725                              | ppm          |
| Area C          | 10/25/11    | P24               | 10594                             | ppm          |
| Area C          | 10/25/11    | P24               | 5610                              | ppm          |
| Area C          | 10/25/11    | P23               | 3492                              | ppm          |
| Area C          | 10/25/11    | P23               | 1560                              | ppm          |
| Area C          | 10/25/11    | P22               | 1186                              | ppm          |
| Area C          | 10/25/11    | P22               | 1457                              | ppm          |
| Area C          | 10/25/11    | P22               | 1162                              | ppm          |
| Area C          | 10/25/11    | P22               | 945                               | ppm          |
| Area C          | 10/25/11    | P21               | 412                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/25/11    | P20               | 183                               | ppm          |
| Area C          | 10/25/11    | P19               | 400                               | ppm          |
| Area C          | 10/25/11    | P19               | 492                               | ppm          |
| Area C          | 10/25/11    | P19               | 1865                              | ppm          |
| Area C          | 10/25/11    | P19               | 131                               | ppm          |
| Area C          | 10/25/11    | P18               | 299                               | ppm          |
| Area C          | 10/25/11    | P17               | 293                               | ppm          |
| Area C          | 10/25/11    | P16               | 417                               | ppm          |
| Area C          | 10/25/11    | P15               | 608                               | ppm          |
| Area C          | 10/25/11    | P15               | 692                               | ppm          |
| Area C          | 10/25/11    | P15               | 1062                              | ppm          |
| Area C          | 10/25/11    | P15               | 491                               | ppm          |
| Area C          | 10/25/11    | P15               | 407                               | ppm          |
| Area C          | 10/25/11    | P14               | 303                               | ppm          |
| Area C          | 10/25/11    | P13               | 205                               | ppm          |
| Area C          | 10/25/11    | P12               | 668                               | ppm          |
| Area C          | 10/25/11    | P11               | 737                               | ppm          |
| Area C          | 10/25/11    | P11               | 615                               | ppm          |
| Area C          | 10/25/11    | P10               | 266                               | ppm          |
| Area C          | 10/25/11    | P09               | 346                               | ppm          |
| Area C          | 10/25/11    | P08               | 718                               | ppm          |
| Area C          | 10/25/11    | P08               | 322                               | ppm          |
| Area C          | 10/25/11    | P07               | 612                               | ppm          |
| Area C          | 10/25/11    | P06               | 2184                              | ppm          |
| Area C          | 10/25/11    | P06               | 1842                              | ppm          |
| Area C          | 10/25/11    | P05               | 2121                              | ppm          |
| Area C          | 10/25/11    | P05               | 2822                              | ppm          |
| Area C          | 10/25/11    | P04               | 1235                              | ppm          |
| Area C          | 10/26/11    | P04               | 851                               | ppm          |
| Area C          | 10/26/11    | P03               | 523                               | ppm          |
| Area C          | 10/26/11    | P02               | 338                               | ppm          |
| Area C          | 10/26/11    | P01               | 1328                              | ppm          |
| Area C          | 10/26/11    | P01               | 501                               | ppm          |
| Area C          | 10/26/11    | Q01               | 571                               | ppm          |
| Area C          | 10/26/11    | Q02               | 496                               | ppm          |
| Area C          | 10/26/11    | Q03               | 565                               | ppm          |
| Area C          | 10/26/11    | Q04               | 1890                              | ppm          |
| Area C          | 10/26/11    | Q04               | 1193                              | ppm          |
| Area C          | 10/26/11    | Q05               | 1899                              | ppm          |
| Area C          | 10/26/11    | Q06               | 1126                              | ppm          |
| Area C          | 10/26/11    | Q07               | 1244                              | ppm          |
| Area C          | 10/26/11    | Q07               | 1393                              | ppm          |
| Area C          | 10/26/11    | Q07               | 925                               | ppm          |
| Area C          | 10/26/11    | Q07               | 809                               | ppm          |
| Area C          | 10/26/11    | Q07               | 662                               | ppm          |
| Area C          | 10/26/11    | Q07               | 493                               | ppm          |
| Area C          | 10/26/11    | Q08               | 915                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/26/11    | Q09               | 319                               | ppm          |
| Area C          | 10/26/11    | Q10               | 1763                              | ppm          |
| Area C          | 10/26/11    | Q10               | 1166                              | ppm          |
| Area C          | 10/26/11    | Q11               | 472                               | ppm          |
| Area C          | 10/26/11    | Q12               | 229                               | ppm          |
| Area C          | 10/26/11    | Q13               | 559                               | ppm          |
| Area C          | 10/26/11    | Q14               | 549                               | ppm          |
| Area C          | 10/26/11    | Q15               | 1338                              | ppm          |
| Area C          | 10/26/11    | Q16               | 723                               | ppm          |
| Area C          | 10/26/11    | Q17               | 149                               | ppm          |
| Area C          | 10/26/11    | Q18               | 556                               | ppm          |
| Area C          | 10/26/11    | Q19               | 3527                              | ppm          |
| Area C          | 10/26/11    | Q19               | 2559                              | ppm          |
| Area C          | 10/26/11    | Q19               | 2111                              | ppm          |
| Area C          | 10/26/11    | Q19               | 1381                              | ppm          |
| Area C          | 10/26/11    | Q20               | 799                               | ppm          |
| Area C          | 10/26/11    | Q21               | 1031                              | ppm          |
| Area C          | 10/26/11    | Q23               | 583                               | ppm          |
| Area C          | 10/26/11    | Q22               | 2863                              | ppm          |
| Area C          | 10/26/11    | Q24               | 2143                              | ppm          |
| Area C          | 10/26/11    | Q25               | 1724                              | ppm          |
| Area C          | 10/26/11    | R25               | 2389                              | ppm          |
| Area C          | 10/26/11    | R24               | 431                               | ppm          |
| Area C          | 10/26/11    | R23               | 1699                              | ppm          |
| Area C          | 10/26/11    | R22               | 287                               | ppm          |
| Area C          | 10/26/11    | R21               | 517                               | ppm          |
| Area C          | 10/26/11    | R21               | 241                               | ppm          |
| Area C          | 10/26/11    | R20               | 181                               | ppm          |
| Area C          | 10/26/11    | R19               | 839                               | ppm          |
| Area C          | 10/26/11    | R19               | 610                               | ppm          |
| Area C          | 10/26/11    | R19               | 1082                              | ppm          |
| Area C          | 10/26/11    | R19               | 497                               | ppm          |
| Area C          | 10/26/11    | R18               | 888                               | ppm          |
| Area C          | 10/26/11    | R18               | 719                               | ppm          |
| Area C          | 10/26/11    | R17               | 571                               | ppm          |
| Area C          | 10/26/11    | R16               | 366                               | ppm          |
| Area C          | 10/26/11    | R15               | 196                               | ppm          |
| Area C          | 10/26/11    | R14               | 828                               | ppm          |
| Area C          | 10/26/11    | R13               | 195                               | ppm          |
| Area C          | 10/26/11    | R12               | 782                               | ppm          |
| Area C          | 10/26/11    | R11               | 860                               | ppm          |
| Area C          | 10/26/11    | R11               | 1000                              | ppm          |
| Area C          | 10/26/11    | R11               | 738                               | ppm          |
| Area C          | 10/26/11    | R11               | 335                               | ppm          |
| Area C          | 10/26/11    | R10               | 689                               | ppm          |
| Area C          | 10/26/11    | R9                | 475                               | ppm          |
| Area C          | 10/26/11    | R8                | 1197                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/26/11    | R7                | 1104                              | ppm          |
| Area C          | 10/26/11    | R6                | 1387                              | ppm          |
| Area C          | 10/26/11    | R5                | 718                               | ppm          |
| Area C          | 10/26/11    | R4                | 1902                              | ppm          |
| Area C          | 10/26/11    | R3                | 491                               | ppm          |
| Area C          | 10/26/11    | R2                | 515                               | ppm          |
| Area C          | 10/26/11    | R1                | 304                               | ppm          |
| Area C          | 10/26/11    | S1                | 682                               | ppm          |
| Area C          | 10/26/11    | S2                | 448                               | ppm          |
| Area C          | 10/26/11    | S3                | 868                               | ppm          |
| Area C          | 10/26/11    | S4                | 1509                              | ppm          |
| Area C          | 10/26/11    | S5                | 1657                              | ppm          |
| Area C          | 10/26/11    | S6                | 1177                              | ppm          |
| Area C          | 10/26/11    | S7                | 1346                              | ppm          |
| Area C          | 10/26/11    | S8                | 1690                              | ppm          |
| Area C          | 10/26/11    | S9                | 876                               | ppm          |
| Area C          | 10/26/11    | S10               | 1171                              | ppm          |
| Area C          | 10/26/11    | S11               | 1258                              | ppm          |
| Area C          | 10/26/11    | S12               | 872                               | ppm          |
| Area C          | 10/26/11    | S13               | 309                               | ppm          |
| Area C          | 10/26/11    | S14               | 1126                              | ppm          |
| Area C          | 10/26/11    | S15               | 297                               | ppm          |
| Area C          | 10/26/11    | S16               | 153                               | ppm          |
| Area C          | 10/26/11    | S17               | 126                               | ppm          |
| Area C          | 10/26/11    | S18               | 396                               | ppm          |
| Area C          | 10/26/11    | S19               | 643                               | ppm          |
| Area C          | 10/26/11    | S20               | 655                               | ppm          |
| Area C          | 10/26/11    | S21               | 249                               | ppm          |
| Area C          | 10/26/11    | S22               | 280                               | ppm          |
| Area C          | 10/26/11    | S23               | 176                               | ppm          |
| Area C          | 10/26/11    | S24               | 208                               | ppm          |
| Area C          | 10/26/11    | S25               | 1267                              | ppm          |
| Area C          | 10/26/11    | T25               | 314                               | ppm          |
| Area C          | 10/26/11    | T24               | 398                               | ppm          |
| Area C          | 10/26/11    | T23               | 401                               | ppm          |
| Area C          | 10/26/11    | T22               | 530                               | ppm          |
| Area C          | 10/26/11    | T21               | 186                               | ppm          |
| Area C          | 10/26/11    | T20               | 225                               | ppm          |
| Area C          | 10/26/11    | T19               | 698                               | ppm          |
| Area C          | 10/26/11    | T18               | 719                               | ppm          |
| Area C          | 10/26/11    | T17               | 517                               | ppm          |
| Area C          | 10/26/11    | T16               | 189                               | ppm          |
| Area C          | 10/26/11    | T15               | 327                               | ppm          |
| Area C          | 10/26/11    | T14               | 472                               | ppm          |
| Area C          | 10/26/11    | T13               | 283                               | ppm          |
| Area C          | 10/26/11    | T12               | 494                               | ppm          |
| Area C          | 10/26/11    | T11               | 543                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/26/11    | T10               | 897                               | ppm          |
| Area C          | 10/26/11    | T9                | 1578                              | ppm          |
| Area C          | 10/26/11    | T8                | 911                               | ppm          |
| Area C          | 10/26/11    | T7                | 878                               | ppm          |
| Area C          | 10/26/11    | T6                | 1419                              | ppm          |
| Area C          | 10/26/11    | T5                | 1545                              | ppm          |
| Area C          | 10/26/11    | T4                | 1170                              | ppm          |
| Area C          | 10/26/11    | T3                | 671                               | ppm          |
| Area C          | 10/26/11    | T2                | 1010                              | ppm          |
| Area C          | 10/26/11    | T1                | 1300                              | ppm          |
| Area C          | 10/26/11    | U1                | 876                               | ppm          |
| Area C          | 10/26/11    | U2                | 921                               | ppm          |
| Area C          | 10/26/11    | U3                | 627                               | ppm          |
| Area C          | 10/26/11    | U4                | 1145                              | ppm          |
| Area C          | 10/26/11    | U5                | 3153                              | ppm          |
| Area C          | 10/26/11    | U6                | 1001                              | ppm          |
| Area C          | 10/26/11    | U7                | 1305                              | ppm          |
| Area C          | 10/26/11    | U8                | 719                               | ppm          |
| Area C          | 10/26/11    | U9                | 1554                              | ppm          |
| Area C          | 10/26/11    | U10               | 388                               | ppm          |
| Area C          | 10/26/11    | U11               | 1291                              | ppm          |
| Area C          | 10/26/11    | U12               | 542                               | ppm          |
| Area C          | 10/26/11    | U13               | 2025                              | ppm          |
| Area C          | 10/26/11    | U14               | 1289                              | ppm          |
| Area C          | 10/26/11    | U15               | 559                               | ppm          |
| Area C          | 10/26/11    | U16               | 471                               | ppm          |
| Area C          | 10/26/11    | U17               | 460                               | ppm          |
| Area C          | 10/26/11    | U18               | 740                               | ppm          |
| Area C          | 10/26/11    | U19               | 376                               | ppm          |
| Area C          | 10/26/11    | U20               | 352                               | ppm          |
| Area C          | 10/26/11    | U21               | 619                               | ppm          |
| Area C          | 10/26/11    | U22               | 164                               | ppm          |
| Area C          | 10/26/11    | U23               | 248                               | ppm          |
| Area C          | 10/26/11    | U24               | 211                               | ppm          |
| Area C          | 10/26/11    | U25               | 956                               | ppm          |
| Area C          | 10/26/11    | V25               | 797                               | ppm          |
| Area C          | 10/26/11    | V24               | 265                               | ppm          |
| Area C          | 10/26/11    | V23               | 301                               | ppm          |
| Area C          | 10/26/11    | V22               | 530                               | ppm          |
| Area C          | 10/26/11    | V21               | 237                               | ppm          |
| Area C          | 10/26/11    | V20               | 243                               | ppm          |
| Area C          | 10/26/11    | V19               | 804                               | ppm          |
| Area C          | 10/26/11    | V18               | 473                               | ppm          |
| Area C          | 10/26/11    | V17               | 1227                              | ppm          |
| Area C          | 10/26/11    | V16               | 1378                              | ppm          |
| Area C          | 10/26/11    | V15               | 751                               | ppm          |
| Area C          | 10/26/11    | V14               | 1093                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/26/11    | V13               | 3014                              | ppm          |
| Area C          | 10/26/11    | W1                | 247                               | ppm          |
| Area C          | 10/26/11    | W2                | 314                               | ppm          |
| Area C          | 10/26/11    | W3                | 1027                              | ppm          |
| Area C          | 10/26/11    | W4                | 2163                              | ppm          |
| Area C          | 10/26/11    | W5                | 1634                              | ppm          |
| Area C          | 10/26/11    | W6                | 529                               | ppm          |
| Area C          | 10/26/11    | W7                | 639                               | ppm          |
| Area C          | 10/26/11    | W8                | 1232                              | ppm          |
| Area C          | 10/26/11    | W9                | 715                               | ppm          |
| Area C          | 10/26/11    | W10               | 329                               | ppm          |
| Area C          | 10/26/11    | W11               | 506                               | ppm          |
| Area C          | 10/26/11    | W12               | 1410                              | ppm          |
| Area C          | 10/26/11    | W13               | 1243                              | ppm          |
| Area C          | 10/26/11    | W14               | 1049                              | ppm          |
| Area C          | 10/26/11    | W15               | 846                               | ppm          |
| Area C          | 10/26/11    | W16               | 1478                              | ppm          |
| Area C          | 10/26/11    | W17               | 1310                              | ppm          |
| Area C          | 10/26/11    | W17               | 451                               | ppm          |
| Area C          | 10/26/11    | W19               | 835                               | ppm          |
| Area C          | 10/26/11    | W20               | 402                               | ppm          |
| Area C          | 10/26/11    | W21               | 200                               | ppm          |
| Area C          | 10/26/11    | W22               | 209                               | ppm          |
| Area C          | 10/26/11    | W23               | 286                               | ppm          |
| Area C          | 10/26/11    | W24               | 343                               | ppm          |
| Area C          | 10/26/11    | W25               | 2168                              | ppm          |
| Area C          | 10/26/11    | L25               | 2891                              | ppm          |
| Area C          | 10/26/11    | M25               | 1916                              | ppm          |
| Area C          | 10/26/11    | N25               | 1144                              | ppm          |
| Area C          | 10/26/11    | L23               | 348                               | ppm          |
| Area C          | 10/26/11    | L23               | 328                               | ppm          |
| Area C          | 10/26/11    | L23               | 373                               | ppm          |
| Area C          | 10/26/11    | L22               | 982                               | ppm          |
| Area C          | 10/26/11    | M6                | 1156                              | ppm          |
| Area C          | 10/26/11    | N6                | 2036                              | ppm          |
| Area C          | 10/26/11    | N5                | 1907                              | ppm          |
| Area C          | 10/26/11    | K25               | 956                               | ppm          |
| Area C          | 10/26/11    | K19               | 850                               | ppm          |
| Area C          | 10/27/11    | A11               | 489                               | ppm          |
| Area C          | 10/27/11    | A20               | 332                               | ppm          |
| Area C          | 10/27/11    | A22               | 518                               | ppm          |
| Area C          | 10/27/11    | A25               | 263                               | ppm          |
| Area C          | 10/27/11    | C22               | 740                               | ppm          |
| Area C          | 10/27/11    | C25               | 175                               | ppm          |
| Area C          | 10/27/11    | E25               | 1866                              | ppm          |
| Area C          | 10/28/11    | K1                | 257                               | ppm          |
| Area C          | 10/28/11    | K2                | 195                               | ppm          |



**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/28/11    | K3                | 385                               | ppm          |
| Area C          | 10/28/11    | K4                | 1284                              | ppm          |
| Area C          | 10/28/11    | K5                | 422                               | ppm          |
| Area C          | 10/28/11    | K6                | 300                               | ppm          |
| Area C          | 10/28/11    | K25               | 485                               | ppm          |
| Area C          | 10/28/11    | K7                | 1910                              | ppm          |
| Area C          | 10/28/11    | K7                | 526                               | ppm          |
| Area C          | 10/28/11    | K8                | 1101                              | ppm          |
| Area C          | 10/28/11    | K8                | 2170                              | ppm          |
| Area C          | 10/28/11    | K8                | 459                               | ppm          |
| Area C          | 10/28/11    | K9                | 237                               | ppm          |
| Area C          | 10/28/11    | K10               | 617                               | ppm          |
| Area C          | 10/28/11    | K11               | 795                               | ppm          |
| Area C          | 10/28/11    | K11               | 403                               | ppm          |
| Area C          | 10/28/11    | K12               | 683                               | ppm          |
| Area C          | 10/28/11    | K13               | 517                               | ppm          |
| Area C          | 10/28/11    | K14               | 188                               | ppm          |
| Area C          | 10/28/11    | K15               | 406                               | ppm          |
| Area C          | 10/28/11    | K16               | 1557                              | ppm          |
| Area C          | 10/28/11    | K16               | 1035                              | ppm          |
| Area C          | 10/28/11    | K17               | 339                               | ppm          |
| Area C          | 10/28/11    | K18               | 1033                              | ppm          |
| Area C          | 10/28/11    | K18               | 526                               | ppm          |
| Area C          | 10/28/11    | K19               | 364                               | ppm          |
| Area C          | 10/28/11    | K20               | 291                               | ppm          |
| Area C          | 10/28/11    | K21               | 275                               | ppm          |
| Area C          | 10/28/11    | K22               | 230                               | ppm          |
| Area C          | 10/28/11    | K23               | 265                               | ppm          |
| Area C          | 10/28/11    | K24               | 321                               | ppm          |
| Area C          | 10/28/11    | L1                | 190                               | ppm          |
| Area C          | 10/28/11    | L2                | 273                               | ppm          |
| Area C          | 10/28/11    | L3                | 460                               | ppm          |
| Area C          | 10/28/11    | L4                | 211                               | ppm          |
| Area C          | 10/28/11    | L5                | 268                               | ppm          |
| Area C          | 10/28/11    | L6                | 294                               | ppm          |
| Area C          | 10/28/11    | L7                | 446                               | ppm          |
| Area C          | 10/28/11    | L8                | 242                               | ppm          |
| Area C          | 10/28/11    | L9                | 263                               | ppm          |
| Area C          | 10/28/11    | L10               | 345                               | ppm          |
| Area C          | 10/28/11    | L11               | 611                               | ppm          |
| Area C          | 10/28/11    | L12               | 205                               | ppm          |
| Area C          | 10/28/11    | L13               | 189                               | ppm          |
| Area C          | 10/28/11    | L14               | 102                               | ppm          |
| Area C          | 10/28/11    | L15               | 319                               | ppm          |
| Area C          | 10/28/11    | L16               | 438                               | ppm          |
| Area C          | 10/28/11    | L17               | 282                               | ppm          |
| Area C          | 10/28/11    | L18               | 654                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/28/11    | L18               | 477                               | ppm          |
| Area C          | 10/28/11    | L19               | 345                               | ppm          |
| Area C          | 10/28/11    | L20               | 317                               | ppm          |
| Area C          | 10/28/11    | L21               | 244                               | ppm          |
| Area C          | 10/28/11    | L22               | 663                               | ppm          |
| Area C          | 10/28/11    | L23               | 290                               | ppm          |
| Area C          | 10/28/11    | L24               | 486                               | ppm          |
| Area C          | 10/28/11    | L25               | 5809                              | ppm          |
| Area C          | 10/28/11    | M1                | 191                               | ppm          |
| Area C          | 10/28/11    | M2                | 448                               | ppm          |
| Area C          | 10/28/11    | M3                | 219                               | ppm          |
| Area C          | 10/28/11    | M4                | 225                               | ppm          |
| Area C          | 10/28/11    | M5                | 242                               | ppm          |
| Area C          | 10/28/11    | M6                | 431                               | ppm          |
| Area C          | 10/28/11    | M7                | 2215                              | ppm          |
| Area C          | 10/28/11    | M7                | 486                               | ppm          |
| Area C          | 10/28/11    | M8                | 1111                              | ppm          |
| Area C          | 10/28/11    | M8                | 465                               | ppm          |
| Area C          | 10/28/11    | M9                | 353                               | ppm          |
| Area C          | 10/28/11    | M10               | 417                               | ppm          |
| Area C          | 10/28/11    | M11               | 239                               | ppm          |
| Area C          | 10/28/11    | M12               | 440                               | ppm          |
| Area C          | 10/28/11    | M13               | 534                               | ppm          |
| Area C          | 10/28/11    | M14               | 852                               | ppm          |
| Area C          | 10/28/11    | M14               | 472                               | ppm          |
| Area C          | 10/28/11    | M15               | 323                               | ppm          |
| Area C          | 10/28/11    | M16               | 925                               | ppm          |
| Area C          | 10/28/11    | M16               | 877                               | ppm          |
| Area C          | 10/28/11    | M17               | 294                               | ppm          |
| Area C          | 10/28/11    | M18               | 453                               | ppm          |
| Area C          | 10/28/11    | M19               | 370                               | ppm          |
| Area C          | 10/28/11    | M20               | 584                               | ppm          |
| Area C          | 10/28/11    | M21               | 541                               | ppm          |
| Area C          | 10/28/11    | M22               | 246                               | ppm          |
| Area C          | 10/28/11    | M23               | 497                               | ppm          |
| Area C          | 10/28/11    | M24               | 339                               | ppm          |
| Area C          | 10/28/11    | M25               | 1247                              | ppm          |
| Area C          | 10/28/11    | L25               | 322                               | ppm          |
| Area C          | 10/28/11    | K16               | 379                               | ppm          |
| Area C          | 10/28/11    | K4                | 695                               | ppm          |
| Area C          | 10/28/11    | N1                | 898                               | ppm          |
| Area C          | 10/28/11    | N2                | 335                               | ppm          |
| Area C          | 10/28/11    | N3                | 607                               | ppm          |
| Area C          | 10/28/11    | N4                | 873                               | ppm          |
| Area C          | 10/28/11    | N5                | 453                               | ppm          |
| Area C          | 10/28/11    | N6                | 430                               | ppm          |
| Area C          | 10/28/11    | N7                | 342                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/28/11    | N8                | 197                               | ppm          |
| Area C          | 10/28/11    | N9                | 227                               | ppm          |
| Area C          | 10/28/11    | N10               | 272                               | ppm          |
| Area C          | 10/28/11    | N11               | 207                               | ppm          |
| Area C          | 10/28/11    | N12               | 150                               | ppm          |
| Area C          | 10/28/11    | N13               | 270                               | ppm          |
| Area C          | 10/28/11    | N14               | 813                               | ppm          |
| Area C          | 10/28/11    | N15               | 368                               | ppm          |
| Area C          | 10/28/11    | N16               | 269                               | ppm          |
| Area C          | 10/28/11    | N17               | 337                               | ppm          |
| Area C          | 10/28/11    | N18               | 195                               | ppm          |
| Area C          | 10/28/11    | N19               | 294                               | ppm          |
| Area C          | 10/28/11    | N20               | 405                               | ppm          |
| Area C          | 10/28/11    | N21               | 272                               | ppm          |
| Area C          | 10/28/11    | N22               | 436                               | ppm          |
| Area C          | 10/28/11    | N23               | 400                               | ppm          |
| Area C          | 10/28/11    | N24               | 364                               | ppm          |
| Area C          | 10/28/11    | N25               | 1241                              | ppm          |
| Area C          | 10/28/11    | N10               | 413                               | ppm          |
| Area C          | 10/28/11    | N10               | 419                               | ppm          |
| Area C          | 10/28/11    | O1                | 511                               | ppm          |
| Area C          | 10/28/11    | O2                | 263                               | ppm          |
| Area C          | 10/28/11    | O3                | 381                               | ppm          |
| Area C          | 10/28/11    | O4                | 156                               | ppm          |
| Area C          | 10/28/11    | O5                | 370                               | ppm          |
| Area C          | 10/28/11    | O6                | 296                               | ppm          |
| Area C          | 10/28/11    | O7                | 271                               | ppm          |
| Area C          | 10/28/11    | O8                | 293                               | ppm          |
| Area C          | 10/28/11    | O9                | 147                               | ppm          |
| Area C          | 10/28/11    | O10               | 291                               | ppm          |
| Area C          | 10/31/11    | O11               | 369                               | ppm          |
| Area C          | 10/31/11    | O12               | 435                               | ppm          |
| Area C          | 10/31/11    | O13               | 582                               | ppm          |
| Area C          | 10/31/11    | O14               | 314                               | ppm          |
| Area C          | 10/31/11    | O15               | 381                               | ppm          |
| Area C          | 10/31/11    | O16               | 292                               | ppm          |
| Area C          | 10/31/11    | O17               | 256                               | ppm          |
| Area C          | 10/31/11    | O18               | 124                               | ppm          |
| Area C          | 10/31/11    | O19               | 439                               | ppm          |
| Area C          | 10/31/11    | O20               | 613                               | ppm          |
| Area C          | 10/31/11    | O20               | 368                               | ppm          |
| Area C          | 10/31/11    | O21               | 620                               | ppm          |
| Area C          | 10/31/11    | O21               | 533                               | ppm          |
| Area C          | 10/31/11    | O21               | 545                               | ppm          |
| Area C          | 10/31/11    | O21               | 283                               | ppm          |
| Area C          | 10/31/11    | O22               | 507                               | ppm          |
| Area C          | 10/31/11    | O22               | 372                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/31/11    | O22               | 559                               | ppm          |
| Area C          | 10/31/11    | O24               | 1748                              | ppm          |
| Area C          | 10/31/11    | O24               | 1975                              | ppm          |
| Area C          | 10/31/11    | O24               | 1355                              | ppm          |
| Area C          | 10/31/11    | P1                | 727                               | ppm          |
| Area C          | 10/31/11    | P1                | 699                               | ppm          |
| Area C          | 10/31/11    | P1                | 868                               | ppm          |
| Area C          | 10/31/11    | P2                | 523                               | ppm          |
| Area C          | 10/31/11    | P2                | 946                               | ppm          |
| Area C          | 10/31/11    | P3                | 397                               | ppm          |
| Area C          | 10/31/11    | P4                | 826                               | ppm          |
| Area C          | 10/31/11    | P4                | 236                               | ppm          |
| Area C          | 10/31/11    | P5                | 616                               | ppm          |
| Area C          | 10/31/11    | P6                | 766                               | ppm          |
| Area C          | 10/31/11    | P7                | 267                               | ppm          |
| Area C          | 10/31/11    | P8                | 380                               | ppm          |
| Area C          | 10/31/11    | P9                | 279                               | ppm          |
| Area C          | 10/31/11    | P10               | 296                               | ppm          |
| Area C          | 10/31/11    | P11               | 425                               | ppm          |
| Area C          | 10/31/11    | P12               | 853                               | ppm          |
| Area C          | 10/31/11    | P12               | 405                               | ppm          |
| Area C          | 10/31/11    | P13               | 402                               | ppm          |
| Area C          | 10/31/11    | P13               | 372                               | ppm          |
| Area C          | 10/31/11    | P14               | 324                               | ppm          |
| Area C          | 10/31/11    | P15               | 799                               | ppm          |
| Area C          | 10/31/11    | P15               | 843                               | ppm          |
| Area C          | 10/31/11    | P16               | 393                               | ppm          |
| Area C          | 10/31/11    | P17               | 181                               | ppm          |
| Area C          | 10/31/11    | P18               | 121                               | ppm          |
| Area C          | 10/31/11    | P19               | 310                               | ppm          |
| Area C          | 10/31/11    | P19               | 355                               | ppm          |
| Area C          | 10/31/11    | P19               | 465                               | ppm          |
| Area C          | 10/31/11    | P20               | 276                               | ppm          |
| Area C          | 10/31/11    | P21               | 1190                              | ppm          |
| Area C          | 10/31/11    | P22               | 334                               | ppm          |
| Area C          | 10/31/11    | P23               | 392                               | ppm          |
| Area C          | 10/31/11    | P24               | 3292                              | ppm          |
| Area C          | 10/31/11    | P25               | 1730                              | ppm          |
| Area C          | 10/31/11    | O24               | 1282                              | ppm          |
| Area C          | 10/31/11    | O24               | 1273                              | ppm          |
| Area C          | 10/31/11    | O25               | 1529                              | ppm          |
| Area C          | 10/31/11    | P1                | 683                               | ppm          |
| Area C          | 10/31/11    | P1                | 803                               | ppm          |
| Area C          | 10/31/11    | P2                | 497                               | ppm          |
| Area C          | 10/31/11    | P2                | 222                               | ppm          |
| Area C          | 10/31/11    | P15               | 262                               | ppm          |
| Area C          | 10/31/11    | P19               | 229                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/31/11    | P19               | 345                               | ppm          |
| Area C          | 10/31/11    | P21               | 280                               | ppm          |
| Area C          | 10/31/11    | Q1                | 681                               | ppm          |
| Area C          | 10/31/11    | Q2                | 397                               | ppm          |
| Area C          | 10/31/11    | Q3                | 637                               | ppm          |
| Area C          | 10/31/11    | Q3                | 521                               | ppm          |
| Area C          | 10/31/11    | Q4                | 1388                              | ppm          |
| Area C          | 10/31/11    | Q4                | 2588                              | ppm          |
| Area C          | 10/31/11    | Q5                | 725                               | ppm          |
| Area C          | 10/31/11    | Q6                | 596                               | ppm          |
| Area C          | 10/31/11    | Q7                | 221                               | ppm          |
| Area C          | 10/31/11    | Q8                | 263                               | ppm          |
| Area C          | 10/31/11    | Q9                | 283                               | ppm          |
| Area C          | 10/31/11    | Q10               | 305                               | ppm          |
| Area C          | 10/31/11    | Q11               | 255                               | ppm          |
| Area C          | 10/31/11    | Q12               | 357                               | ppm          |
| Area C          | 10/31/11    | Q12               | 584                               | ppm          |
| Area C          | 10/31/11    | Q13               | 378                               | ppm          |
| Area C          | 10/31/11    | Q14               | 257                               | ppm          |
| Area C          | 10/31/11    | Q15               | 374                               | ppm          |
| Area C          | 10/31/11    | Q16               | 250                               | ppm          |
| Area C          | 10/31/11    | Q17               | 248                               | ppm          |
| Area C          | 10/31/11    | Q18               | 239                               | ppm          |
| Area C          | 10/31/11    | Q19               | 246                               | ppm          |
| Area C          | 10/31/11    | Q120              | 366                               | ppm          |
| Area C          | 10/31/11    | Q21               | 166                               | ppm          |
| Area C          | 10/31/11    | Q22               | 370                               | ppm          |
| Area C          | 10/31/11    | Q23               | 509                               | ppm          |
| Area C          | 10/31/11    | Q24               | 507                               | ppm          |
| Area C          | 10/31/11    | Q25               | 475                               | ppm          |
| Area C          | 10/31/11    | P19               | 244                               | ppm          |
| Area C          | 10/31/11    | P1                | 402                               | ppm          |
| Area C          | 10/31/11    | Q1                | 700                               | ppm          |
| Area C          | 10/31/11    | Q1                | 912                               | ppm          |
| Area C          | 10/31/11    | Q1                | 448                               | ppm          |
| Area C          | 10/31/11    | Q4                | 541                               | ppm          |
| Area C          | 10/31/11    | Q12               | 120                               | ppm          |
| Area C          | 10/31/11    | O24               | 261                               | ppm          |
| Area C          | 10/31/11    | O24               | 984                               | ppm          |
| Area C          | 10/31/11    | P24               | 1025                              | ppm          |
| Area C          | 10/31/11    | P25               | 549                               | ppm          |
| Area C          | 10/31/11    | P24               | 692                               | ppm          |
| Area C          | 10/31/11    | R1                | 336                               | ppm          |
| Area C          | 10/31/11    | R1                | 454                               | ppm          |
| Area C          | 10/31/11    | R2                | 495                               | ppm          |
| Area C          | 10/31/11    | R2                | 527                               | ppm          |
| Area C          | 10/31/11    | R2                | 295                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/31/11    | R3                | 976                               | ppm          |
| Area C          | 10/31/11    | R3                | 410                               | ppm          |
| Area C          | 10/31/11    | R4                | 978                               | ppm          |
| Area C          | 10/31/11    | R4                | 772                               | ppm          |
| Area C          | 10/31/11    | R5                | 358                               | ppm          |
| Area C          | 10/31/11    | R6                | 640                               | ppm          |
| Area C          | 10/31/11    | R7                | 509                               | ppm          |
| Area C          | 10/31/11    | R8                | 557                               | ppm          |
| Area C          | 10/31/11    | R9                | 563                               | ppm          |
| Area C          | 10/31/11    | R9                | 242                               | ppm          |
| Area C          | 10/31/11    | R10               | 307                               | ppm          |
| Area C          | 10/31/11    | R11               | 264                               | ppm          |
| Area C          | 10/31/11    | R12               | 293                               | ppm          |
| Area C          | 10/31/11    | R13               | 315                               | ppm          |
| Area C          | 10/31/11    | R13               | 323                               | ppm          |
| Area C          | 10/31/11    | R14               | 313                               | ppm          |
| Area C          | 10/31/11    | R15               | 225                               | ppm          |
| Area C          | 10/31/11    | R16               | 245                               | ppm          |
| Area C          | 10/31/11    | R17               | 250                               | ppm          |
| Area C          | 10/31/11    | R18               | 443                               | ppm          |
| Area C          | 10/31/11    | R19               | 1393                              | ppm          |
| Area C          | 10/31/11    | R19               | 523                               | ppm          |
| Area C          | 10/31/11    | R19               | 550                               | ppm          |
| Area C          | 10/31/11    | R19               | 250                               | ppm          |
| Area C          | 10/31/11    | R20               | 170                               | ppm          |
| Area C          | 10/31/11    | R21               | 175                               | ppm          |
| Area C          | 10/31/11    | R22               | 215                               | ppm          |
| Area C          | 10/31/11    | R23               | 124                               | ppm          |
| Area C          | 10/31/11    | R24               | 174                               | ppm          |
| Area C          | 10/31/11    | R25               | 171                               | ppm          |
| Area C          | 10/31/11    | S1                | 291                               | ppm          |
| Area C          | 10/31/11    | S2                | 337                               | ppm          |
| Area C          | 10/31/11    | S3                | 535                               | ppm          |
| Area C          | 10/31/11    | S3                | 811                               | ppm          |
| Area C          | 10/31/11    | S3                | 1207                              | ppm          |
| Area C          | 10/31/11    | S3                | 565                               | ppm          |
| Area C          | 10/31/11    | S4                | 881                               | ppm          |
| Area C          | 10/31/11    | S4                | 873                               | ppm          |
| Area C          | 10/31/11    | S5                | 802                               | ppm          |
| Area C          | 10/31/11    | S5                | 426                               | ppm          |
| Area C          | 10/31/11    | S6                | 608                               | ppm          |
| Area C          | 10/31/11    | S6                | 730                               | ppm          |
| Area C          | 10/31/11    | S7                | 319                               | ppm          |
| Area C          | 10/31/11    | S8                | 383                               | ppm          |
| Area C          | 10/31/11    | S9                | 606                               | ppm          |
| Area C          | 10/31/11    | S10               | 327                               | ppm          |
| Area C          | 10/31/11    | S11               | 454                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/31/11    | S11               | 220                               | ppm          |
| Area C          | 10/31/11    | S12               | 303                               | ppm          |
| Area C          | 10/31/11    | S13               | 284                               | ppm          |
| Area C          | 10/31/11    | S14               | 897                               | ppm          |
| Area C          | 10/31/11    | S14               | 420                               | ppm          |
| Area C          | 10/31/11    | S15               | 325                               | ppm          |
| Area C          | 10/31/11    | S16               | 111                               | ppm          |
| Area C          | 10/31/11    | S17               | 137                               | ppm          |
| Area C          | 10/31/11    | S18               | 143                               | ppm          |
| Area C          | 10/31/11    | S19               | 182                               | ppm          |
| Area C          | 10/31/11    | S20               | 252                               | ppm          |
| Area C          | 10/31/11    | S21               | 135                               | ppm          |
| Area C          | 10/31/11    | S22               | 199                               | ppm          |
| Area C          | 10/31/11    | S23               | 128                               | ppm          |
| Area C          | 10/31/11    | S24               | 110                               | ppm          |
| Area C          | 10/31/11    | S25               | 420                               | ppm          |
| Area C          | 10/31/11    | S6                | 980                               | ppm          |
| Area C          | 10/31/11    | S6                | 839                               | ppm          |
| Area C          | 10/31/11    | T1                | 308                               | ppm          |
| Area C          | 10/31/11    | T2                | 492                               | ppm          |
| Area C          | 10/31/11    | T3                | 458                               | ppm          |
| Area C          | 10/31/11    | T4                | 530                               | ppm          |
| Area C          | 10/31/11    | T5                | 606                               | ppm          |
| Area C          | 10/31/11    | T6                | 767                               | ppm          |
| Area C          | 10/31/11    | T7                | 261                               | ppm          |
| Area C          | 10/31/11    | T8                | 223                               | ppm          |
| Area C          | 10/31/11    | T9                | 557                               | ppm          |
| Area C          | 10/31/11    | T10               | 228                               | ppm          |
| Area C          | 10/31/11    | T11               | 303                               | ppm          |
| Area C          | 10/31/11    | T12               | 283                               | ppm          |
| Area C          | 10/31/11    | T13               | 200                               | ppm          |
| Area C          | 10/31/11    | T14               | 439                               | ppm          |
| Area C          | 10/31/11    | T15               | 227                               | ppm          |
| Area C          | 10/31/11    | T16               | 194                               | ppm          |
| Area C          | 10/31/11    | T17               | 362                               | ppm          |
| Area C          | 10/31/11    | T18               | 373                               | ppm          |
| Area C          | 10/31/11    | T19               | 186                               | ppm          |
| Area C          | 10/31/11    | T20               | 148                               | ppm          |
| Area C          | 10/31/11    | T21               | 131                               | ppm          |
| Area C          | 10/31/11    | T22               | 173                               | ppm          |
| Area C          | 10/31/11    | T23               | 155                               | ppm          |
| Area C          | 10/31/11    | T24               | 81                                | ppm          |
| Area C          | 10/31/11    | T25               | 125                               | ppm          |
| Area C          | 10/31/11    | U1                | 884                               | ppm          |
| Area C          | 10/31/11    | U1                | 599                               | ppm          |
| Area C          | 10/31/11    | U2                | 1019                              | ppm          |
| Area C          | 10/31/11    | U1                | 738                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 10/31/11    | U2                | 766                               | ppm          |
| Area C          | 10/31/11    | U2                | 868                               | ppm          |
| Area C          | 10/31/11    | U2                | 698                               | ppm          |
| Area C          | 10/31/11    | U2                | 561                               | ppm          |
| Area C          | 10/31/11    | U3                | 583                               | ppm          |
| Area C          | 10/31/11    | U3                | 1080                              | ppm          |
| Area C          | 10/31/11    | U3                | 824                               | ppm          |
| Area C          | 10/31/11    | U3                | 525                               | ppm          |
| Area C          | 10/31/11    | U4                | 948                               | ppm          |
| Area C          | 10/31/11    | U4                | 853                               | ppm          |
| Area C          | 10/31/11    | U4                | 1041                              | ppm          |
| Area C          | 10/31/11    | U4                | 802                               | ppm          |
| Area C          | 10/31/11    | U5                | 2284                              | ppm          |
| Area C          | 10/31/11    | U5                | 815                               | ppm          |
| Area C          | 10/31/11    | U6                | 440                               | ppm          |
| Area C          | 10/31/11    | U7                | 752                               | ppm          |
| Area C          | 10/31/11    | U7                | 248                               | ppm          |
| Area C          | 10/31/11    | U8                | 195                               | ppm          |
| Area C          | 10/31/11    | U9                | 178                               | ppm          |
| Area C          | 10/31/11    | U10               | 341                               | ppm          |
| Area C          | 10/31/11    | U11               | 578                               | ppm          |
| Area C          | 10/31/11    | U11               | 311                               | ppm          |
| Area C          | 10/31/11    | U12               | 677                               | ppm          |
| Area C          | 10/31/11    | U12               | 710                               | ppm          |
| Area C          | 10/31/11    | U12               | 726                               | ppm          |
| Area C          | 10/31/11    | U12               | 911                               | ppm          |
| Area C          | 10/31/11    | U12               | 393                               | ppm          |
| Area C          | 10/31/11    | U13               | 261                               | ppm          |
| Area C          | 10/31/11    | U14               | 360                               | ppm          |
| Area C          | 10/31/11    | U15               | 652                               | ppm          |
| Area C          | 10/31/11    | U15               | 317                               | ppm          |
| Area C          | 10/31/11    | U16               | 314                               | ppm          |
| Area C          | 10/31/11    | U17               | 397                               | ppm          |
| Area C          | 10/31/11    | U18               | 260                               | ppm          |
| Area C          | 10/31/11    | U19               | 454                               | ppm          |
| Area C          | 10/31/11    | U19               | 210                               | ppm          |
| Area C          | 10/31/11    | U20               | 174                               | ppm          |
| Area C          | 10/31/11    | U21               | 143                               | ppm          |
| Area C          | 10/31/11    | U22               | 217                               | ppm          |
| Area C          | 10/31/11    | U23               | 126                               | ppm          |
| Area C          | 10/31/11    | U24               | 146                               | ppm          |
| Area C          | 10/31/11    | U25               | 324                               | ppm          |
| Area C          | 10/31/11    | U4                | 677                               | ppm          |
| Area C          | 10/31/11    | U4                | 827                               | ppm          |
| Area C          | 10/31/11    | U4                | 723                               | ppm          |
| Area C          | 10/31/11    | U5                | 1369                              | ppm          |
| Area C          | 10/31/11    | U5                | 448                               | ppm          |



**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 11/01/11    | V1                | 249                               | ppm          |
| Area C          | 11/01/11    | V2                | 206                               | ppm          |
| Area C          | 11/01/11    | V3                | 607                               | ppm          |
| Area C          | 11/01/11    | V3                | 236                               | ppm          |
| Area C          | 11/01/11    | V4                | 861                               | ppm          |
| Area C          | 11/01/11    | V4                | 795                               | ppm          |
| Area C          | 11/01/11    | V4                | 816                               | ppm          |
| Area C          | 11/01/11    | V4                | 539                               | ppm          |
| Area C          | 11/01/11    | V5                | 201                               | ppm          |
| Area C          | 11/01/11    | V6                | 369                               | ppm          |
| Area C          | 11/01/11    | V7                | 218                               | ppm          |
| Area C          | 11/01/11    | V8                | 237                               | ppm          |
| Area C          | 11/01/11    | V9                | 140                               | ppm          |
| Area C          | 11/01/11    | V10               | 157                               | ppm          |
| Area C          | 11/01/11    | V11               | 170                               | ppm          |
| Area C          | 11/01/11    | V12               | 229                               | ppm          |
| Area C          | 11/01/11    | V13               | 229                               | ppm          |
| Area C          | 11/01/11    | V14               | 236                               | ppm          |
| Area C          | 11/01/11    | V15               | 403                               | ppm          |
| Area C          | 11/01/11    | V15               | 333                               | ppm          |
| Area C          | 11/01/11    | V16               | 310                               | ppm          |
| Area C          | 11/01/11    | V17               | 161                               | ppm          |
| Area C          | 11/01/11    | V18               | 150                               | ppm          |
| Area C          | 11/01/11    | V19               | 128                               | ppm          |
| Area C          | 11/01/11    | V20               | 138                               | ppm          |
| Area C          | 11/01/11    | V21               | 104                               | ppm          |
| Area C          | 11/01/11    | V22               | 128                               | ppm          |
| Area C          | 11/01/11    | V23               | 121                               | ppm          |
| Area C          | 11/01/11    | V24               | 101                               | ppm          |
| Area C          | 11/01/11    | V25               | 178                               | ppm          |
| Area C          | 11/01/11    | W1                | 128                               | ppm          |
| Area C          | 11/01/11    | W2                | 146                               | ppm          |
| Area C          | 11/01/11    | W3                | 342                               | ppm          |
| Area C          | 11/01/11    | W4                | 1058                              | ppm          |
| Area C          | 11/01/11    | W4                | 1815                              | ppm          |
| Area C          | 11/01/11    | W5                | 282                               | ppm          |
| Area C          | 11/01/11    | W6                | 141                               | ppm          |
| Area C          | 11/01/11    | W7                | 208                               | ppm          |
| Area C          | 11/01/11    | W8                | 305                               | ppm          |
| Area C          | 11/01/11    | W9                | 145                               | ppm          |
| Area C          | 11/01/11    | W10               | 172                               | ppm          |
| Area C          | 11/01/11    | W11               | 184                               | ppm          |
| Area C          | 11/01/11    | C19               | 603                               | ppm          |
| Area C          | 11/01/11    | C19               | 408                               | ppm          |
| Area C          | 11/01/11    | A25               | 760                               | ppm          |
| Area C          | 11/01/11    | A25               | 2195                              | ppm          |
| Area C          | 11/01/11    | G15               | 835                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 11/01/11    | C25               | 313                               | ppm          |
| Area C          | 11/01/11    | W12               | 202                               | ppm          |
| Area C          | 11/01/11    | W13               | 375                               | ppm          |
| Area C          | 11/01/11    | W14               | 456                               | ppm          |
| Area C          | 11/01/11    | W15               | 270                               | ppm          |
| Area C          | 11/01/11    | W16               | 353                               | ppm          |
| Area C          | 11/01/11    | W17               | 385                               | ppm          |
| Area C          | 11/01/11    | W18               | 179                               | ppm          |
| Area C          | 11/01/11    | W19               | 111                               | ppm          |
| Area C          | 11/01/11    | W20               | 169                               | ppm          |
| Area C          | 11/01/11    | W21               | 157                               | ppm          |
| Area C          | 11/01/11    | W22               | 202                               | ppm          |
| Area C          | 11/01/11    | W23               | 130                               | ppm          |
| Area C          | 11/01/11    | W24               | 122                               | ppm          |
| Area C          | 11/01/11    | W25               | 290                               | ppm          |
| Area C          | 11/01/11    | W4                | 1063                              | ppm          |
| Area C          | 11/01/11    | W4                | 834                               | ppm          |
| Area C          | 11/01/11    | M25               | 624                               | ppm          |
| Area C          | 11/01/11    | N25               | 1050                              | ppm          |
| Area C          | 11/01/11    | N25               | 719                               | ppm          |
| Area C          | 11/01/11    | N25               | 637                               | ppm          |
| Area C          | 11/01/11    | O25               | 378                               | ppm          |
| Area C          | 11/01/11    | S4                | 708                               | ppm          |
| Area C          | 11/01/11    | S4                | 484                               | ppm          |
| Area C          | 11/01/11    | N1                | 229                               | ppm          |
| Area C          | 11/01/11    | D2                | 434                               | ppm          |
| Area C          | 11/01/11    | H6                | 235                               | ppm          |
| Area C          | 11/01/11    | F10               | 424                               | ppm          |
| Area C          | 11/01/11    | F10               | 784                               | ppm          |
| Area C          | 11/01/11    | F10               | 484                               | ppm          |
| Area C          | 11/01/11    | F10               | 802                               | ppm          |
| Area C          | 11/01/11    | F10               | 724                               | ppm          |
| Area C          | 11/01/11    | F10               | 434                               | ppm          |
| Area C          | 11/01/11    | A11               | 259                               | ppm          |
| Area C          | 11/01/11    | A22               | 234                               | ppm          |
| Area C          | 11/01/11    | A22               | 301                               | ppm          |
| Area C          | 11/01/11    | C22               | 119                               | ppm          |
| Area C          | 11/01/11    | A25               | 1564                              | ppm          |
| Area C          | 11/01/11    | A25               | 957                               | ppm          |
| Area C          | 11/01/11    | A25               | 775                               | ppm          |
| Area C          | 11/01/11    | A25               | 258                               | ppm          |
| Area C          | 11/01/11    | E25               | 749                               | ppm          |
| Area C          | 11/01/11    | E25               | 231                               | ppm          |
| Area C          | 11/01/11    | G15               | 164                               | ppm          |
| Area C          | 11/01/11    | A24               | 285                               | ppm          |
| Area C          | 11/01/11    | G17               | 1162                              | ppm          |
| Area C          | 11/01/11    | G17               | 138                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 11/01/11    | M16               | 425                               | ppm          |
| Area C          | 11/01/11    | M16               | 556                               | ppm          |
| Area C          | 11/01/11    | M16               | 225                               | ppm          |
| Area C          | 11/01/11    | F19               | 1025                              | ppm          |
| Area C          | 11/01/11    | F19               | 387                               | ppm          |
| Area C          | 11/01/11    | N4                | 505                               | ppm          |
| Area C          | 11/01/11    | N4                | 290                               | ppm          |
| Area C          | 11/01/11    | B16               | 370                               | ppm          |
| Area C          | 11/01/11    | B16               | 378                               | ppm          |
| Area C          | 11/01/11    | S6                | 242                               | ppm          |
| Area C          | 11/01/11    | N14               | 894                               | ppm          |
| Area C          | 11/01/11    | N14               | 254                               | ppm          |
| Area C          | 11/01/11    | C11               | 386                               | ppm          |
| Area C          | 11/01/11    | C11               | 357                               | ppm          |
| Area C          | 11/01/11    | C11               | 405                               | ppm          |
| Area C          | 11/01/11    | C11               | 318                               | ppm          |
| Area C          | 11/01/11    | C11               | 312                               | ppm          |
| Area C          | 11/01/11    | R4                | 136                               | ppm          |
| Area C          | 11/01/11    | W4                | 812                               | ppm          |
| Area C          | 11/01/11    | W4                | 619                               | ppm          |
| Area C          | 11/01/11    | W4                | 255                               | ppm          |
| Area C          | 11/01/11    | W4                | 388                               | ppm          |
| Area C          | 11/01/11    | W4                | 509                               | ppm          |
| Area C          | 11/01/11    | W4                | 482                               | ppm          |
| Area C          | 11/01/11    | W4                | 816                               | ppm          |
| Area C          | 11/01/11    | W4                | 1127                              | ppm          |
| Area C          | 11/01/11    | W4                | 407                               | ppm          |
| Area C          | 11/01/11    | W4                | 539                               | ppm          |
| Area C          | 11/01/11    | W4                | 712                               | ppm          |
| Area C          | 11/01/11    | W4                | 368                               | ppm          |
| Area C          | 11/01/11    | R6                | 415                               | ppm          |
| Area C          | 11/01/11    | T6                | 445                               | ppm          |
| Area C          | 11/01/11    | P6                | 238                               | ppm          |
| Area C          | 11/01/11    | U4                | 1780                              | ppm          |
| Area C          | 11/01/11    | U4                | 662                               | ppm          |
| Area C          | 11/01/11    | K12               | 609                               | ppm          |
| Area C          | 11/01/11    | L22               | 143                               | ppm          |
| Area C          | 11/01/11    | G25               | 222                               | ppm          |
| Area C          | 11/01/11    | F16               | 513                               | ppm          |
| Area C          | 11/01/11    | F16               | 610                               | ppm          |
| Area C          | 11/01/11    | E21               | 253                               | ppm          |
| Area C          | 11/01/11    | A6                | 144                               | ppm          |
| Area C          | 11/01/11    | A17               | 357                               | ppm          |
| Area C          | 11/01/11    | B25               | 186                               | ppm          |
| Area C          | 11/01/11    | B21               | 410                               | ppm          |
| Area C          | 11/01/11    | D21               | 1289                              | ppm          |
| Area C          | 11/01/11    | D21               | 1217                              | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C          | 11/01/11    | C16               | 283                               | ppm          |
| Area C          | 11/01/11    | D11               | 566                               | ppm          |
| Area C          | 11/01/11    | B6                | 307                               | ppm          |
| Area C          | 11/01/11    | K4                | 515                               | ppm          |
| Area C          | 11/01/11    | Q5                | 423                               | ppm          |
| Area C          | 11/01/11    | P24               | 573                               | ppm          |
| Area C Walls    | 11/02/11    | A1                | 191                               | ppm          |
| Area C Walls    | 11/02/11    | A1                | 233                               | ppm          |
| Area C Walls    | 11/02/11    | A1                | 263                               | ppm          |
| Area C Walls    | 11/02/11    | A1                | 230                               | ppm          |
| Area C Walls    | 11/02/11    | A2                | 240                               | ppm          |
| Area C Walls    | 11/02/11    | A3                | 52                                | ppm          |
| Area C Walls    | 11/02/11    | B1                | 311                               | ppm          |
| Area C Walls    | 11/02/11    | B2                | 150                               | ppm          |
| Area C Walls    | 11/02/11    | B3                | 12                                | ppm          |
| Area C Walls    | 11/02/11    | C1                | 310                               | ppm          |
| Area C Walls    | 11/02/11    | C2                | 907                               | ppm          |
| Area C Walls    | 11/02/11    | C2                | 839                               | ppm          |
| Area C Walls    | 11/02/11    | C2                | 1205                              | ppm          |
| Area C Walls    | 11/02/11    | C2                | 1221                              | ppm          |
| Area C Walls    | 11/02/11    | C2                | 1295                              | ppm          |
| Area C Walls    | 11/02/11    | C3                | 175                               | ppm          |
| Area C Walls    | 11/02/11    | D1                | 221                               | ppm          |
| Area C Walls    | 11/02/11    | D2                | 206                               | ppm          |
| Area C Walls    | 11/02/11    | A1                | 29                                | ppm          |
| Area C Walls    | 11/02/11    | D3                | 249                               | ppm          |
| Area C Walls    | 11/02/11    | E1                | 722                               | ppm          |
| Area C Walls    | 11/02/11    | E1                | < LOD                             | ppm          |
| Area C Walls    | 11/02/11    | E1                | 575                               | ppm          |
| Area C Walls    | 11/02/11    | C2                | 907                               | ppm          |
| Area C Walls    | 11/02/11    | E2                | 120                               | ppm          |
| Area C Walls    | 11/02/11    | E3                | 197                               | ppm          |
| Area C Walls    | 11/02/11    | F1                | 51                                | ppm          |
| Area C Walls    | 11/02/11    | F1                | 51                                | ppm          |
| Area C Walls    | 11/02/11    | F2                | 92                                | ppm          |
| Area C Walls    | 11/02/11    | F3                | 64                                | ppm          |
| Area C Walls    | 11/02/11    | C2                | 199                               | ppm          |
| Area C Walls    | 11/02/11    | E1                | 51                                | ppm          |
| Area C Post     | 11/02/11    | A1                | 421                               | ppm          |
| Area C Post     | 11/02/11    | A2                | 728                               | ppm          |
| Area C Post     | 11/02/11    | A3                | 3436                              | ppm          |
| Area C Post     | 11/02/11    | A4                | 751                               | ppm          |
| Area C Post     | 11/02/11    | A4                | 597                               | ppm          |
| Area C Post     | 11/02/11    | A4                | 656                               | ppm          |
| Area C Post     | 11/02/11    | A5                | 193                               | ppm          |
| Area C Post     | 11/02/11    | B1                | 563                               | ppm          |
| Area C Post     | 11/02/11    | B2                | 160                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C Post     | 11/02/11    | B3                | 1088                              | ppm          |
| Area C Post     | 11/02/11    | B3                | 985                               | ppm          |
| Area C Post     | 11/02/11    | B3                | 975                               | ppm          |
| Area C Post     | 11/02/11    | B4                | 197                               | ppm          |
| Area C Post     | 11/02/11    | B4                | 54                                | ppm          |
| Area C Post     | 11/02/11    | B4                | 13                                | ppm          |
| Area C Post     | 11/02/11    | A1                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | A1                | 11                                | ppm          |
| Area C Purlin   | 11/02/11    | A2                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | A2                | 13                                | ppm          |
| Area C Purlin   | 11/02/11    | A3                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | A3                | 36                                | ppm          |
| Area C Purlin   | 11/02/11    | A4                | 26                                | ppm          |
| Area C Purlin   | 11/02/11    | A5                | 26                                | ppm          |
| Area C Purlin   | 11/02/11    | A6                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | A6                | 29                                | ppm          |
| Area C Purlin   | 11/02/11    | A7                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | A7                | 41                                | ppm          |
| Area C Purlin   | 11/02/11    | A8                | 301                               | ppm          |
| Area C Purlin   | 11/02/11    | A8                | 319                               | ppm          |
| Area C Purlin   | 11/02/11    | A8                | 233                               | ppm          |
| Area C Purlin   | 11/02/11    | A9                | 137                               | ppm          |
| Area C Post     | 11/02/11    | B1                | 79                                | ppm          |
| Area C Post     | 11/02/11    | B2                | 21                                | ppm          |
| Area C Post     | 11/02/11    | B3                | < LOD                             | ppm          |
| Area C Post     | 11/02/11    | B3                | 52                                | ppm          |
| Area C Post     | 11/02/11    | B4                | 53                                | ppm          |
| Area C Purlin   | 11/02/11    | B1                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | B1                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | B1                | 12                                | ppm          |
| Area C Purlin   | 11/02/11    | B2                | 44                                | ppm          |
| Area C Purlin   | 11/02/11    | B2                | 61                                | ppm          |
| Area C Purlin   | 11/02/11    | B2                | 39                                | ppm          |
| Area C Purlin   | 11/02/11    | B2                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | B2                | 43                                | ppm          |
| Area C Post     | 11/02/11    | A1                | 207                               | ppm          |
| Area C Post     | 11/02/11    | A2                | 247                               | ppm          |
| Area C Post     | 11/02/11    | A3                | 130                               | ppm          |
| Area C Post     | 11/02/11    | A4                | 292                               | ppm          |
| Area C Post     | 11/02/11    | A4                | 248                               | ppm          |
| Area C Purlin   | 11/02/11    | B3                | 18                                | ppm          |
| Area C Purlin   | 11/02/11    | B4                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | B4                | 34                                | ppm          |
| Area C Purlin   | 11/02/11    | B5                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | B5                | 115                               | ppm          |
| Area C Purlin   | 11/02/11    | B5                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | B5                | < LOD                             | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C Purlin   | 11/02/11    | B5                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | B5                | 54                                | ppm          |
| Area C Purlin   | 11/02/11    | B6                | 24                                | ppm          |
| Area C Purlin   | 11/02/11    | B7                | 70                                | ppm          |
| Area C Purlin   | 11/02/11    | B8                | 50                                | ppm          |
| Area C Purlin   | 11/02/11    | B9                | 221                               | ppm          |
| Area C Purlin   | 11/02/11    | C1                | 31                                | ppm          |
| Area C Purlin   | 11/02/11    | C2                | 54                                | ppm          |
| Area C Purlin   | 11/02/11    | C3                | 53                                | ppm          |
| Area C Purlin   | 11/02/11    | C3                | 84                                | ppm          |
| Area C Purlin   | 11/02/11    | C3                | 76                                | ppm          |
| Area C Purlin   | 11/02/11    | C3                | 48                                | ppm          |
| Area C Purlin   | 11/02/11    | C4                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | C4                | 62                                | ppm          |
| Area C Purlin   | 11/02/11    | C5                | 46                                | ppm          |
| Area C Purlin   | 11/02/11    | C6                | 45                                | ppm          |
| Area C Purlin   | 11/02/11    | C7                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | C7                | 61                                | ppm          |
| Area C Purlin   | 11/02/11    | C8                | 182                               | ppm          |
| Area C Purlin   | 11/02/11    | C9                | 667                               | ppm          |
| Area C Purlin   | 11/02/11    | C9                | 515                               | ppm          |
| Area C Purlin   | 11/02/11    | C9                | 609                               | ppm          |
| Area C Purlin   | 11/02/11    | D1                | 20                                | ppm          |
| Area C Purlin   | 11/02/11    | D1                | 26                                | ppm          |
| Area C Purlin   | 11/02/11    | D2                | 22                                | ppm          |
| Area C Purlin   | 11/02/11    | D3                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | D3                | 43                                | ppm          |
| Area C Purlin   | 11/02/11    | D4                | 31                                | ppm          |
| Area C Purlin   | 11/02/11    | D5                | 85                                | ppm          |
| Area C Purlin   | 11/02/11    | D6                | 207                               | ppm          |
| Area C Purlin   | 11/02/11    | D7                | 149                               | ppm          |
| Area C Purlin   | 11/02/11    | D8                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | D8                | 68                                | ppm          |
| Area C Purlin   | 11/02/11    | D9                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | D9                | 146                               | ppm          |
| Area C Purlin   | 11/02/11    | E1                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | E1                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | E1                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | E1                | 27                                | ppm          |
| Area C Purlin   | 11/02/11    | E2                | 50                                | ppm          |
| Area C Purlin   | 11/02/11    | E2                | 49                                | ppm          |
| Area C Purlin   | 11/02/11    | E3                | 32                                | ppm          |
| Area C Purlin   | 11/02/11    | E3                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | E3                | 64                                | ppm          |
| Area C Purlin   | 11/02/11    | E3                | 37                                | ppm          |
| Area C Purlin   | 11/02/11    | E3                | 40                                | ppm          |
| Area C Purlin   | 11/02/11    | E4                | 25                                | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C Purlin   | 11/02/11    | E4                | 712                               | ppm          |
| Area C Purlin   | 11/02/11    | E4                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | E4                | 24                                | ppm          |
| Area C Purlin   | 11/02/11    | E5                | 1088                              | ppm          |
| Area C Purlin   | 11/02/11    | E5                | 1918                              | ppm          |
| Area C Purlin   | 11/02/11    | E6                | 84                                | ppm          |
| Area C Purlin   | 11/02/11    | E7                | 75                                | ppm          |
| Area C Purlin   | 11/02/11    | E8                | 200                               | ppm          |
| Area C Purlin   | 11/02/11    | E8                | 257                               | ppm          |
| Area C Purlin   | 11/02/11    | E8                | 255                               | ppm          |
| Area C Purlin   | 11/02/11    | E9                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | E9                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | E9                | 127                               | ppm          |
| Area C Purlin   | 11/02/11    | F1                | 331                               | ppm          |
| Area C Purlin   | 11/02/11    | F2                | 34                                | ppm          |
| Area C Purlin   | 11/02/11    | F3                | 21                                | ppm          |
| Area C Purlin   | 11/02/11    | F3                | 21                                | ppm          |
| Area C Purlin   | 11/02/11    | F4                | 16                                | ppm          |
| Area C Purlin   | 11/02/11    | F5                | 13                                | ppm          |
| Area C Purlin   | 11/02/11    | F6                | 31                                | ppm          |
| Area C Purlin   | 11/02/11    | F7                | 22                                | ppm          |
| Area C Purlin   | 11/02/11    | F8                | 30                                | ppm          |
| Area C Purlin   | 11/02/11    | F9                | 29                                | ppm          |
| Area C Purlin   | 11/02/11    | F9                | 31                                | ppm          |
| Area C Purlin   | 11/02/11    | G1                | 32                                | ppm          |
| Area C Purlin   | 11/02/11    | G2                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | G2                | 30                                | ppm          |
| Area C Purlin   | 11/02/11    | G3                | 695                               | ppm          |
| Area C Purlin   | 11/02/11    | G4                | 549                               | ppm          |
| Area C Purlin   | 11/02/11    | G5                | 535                               | ppm          |
| Area C Purlin   | 11/02/11    | G6                | 439                               | ppm          |
| Area C Purlin   | 11/02/11    | G1                | < LOD                             | ppm          |
| Area C Purlin   | 11/02/11    | G1                | 16                                | ppm          |
| Area C Purlin   | 11/02/11    | G1                | 40                                | ppm          |
| Area C Purlin   | 11/02/11    | G1                | 17                                | ppm          |
| Area C Purlin   | 11/02/11    | G2                | 21                                | ppm          |
| Area C Purlin   | 11/02/11    | G3                | 305                               | ppm          |
| Area C Purlin   | 11/02/11    | G4                | 605                               | ppm          |
| Area C Purlin   | 11/02/11    | G5                | 35                                | ppm          |
| Area C Purlin   | 11/02/11    | G6                | 66                                | ppm          |
| Area C Purlin   | 11/02/11    | G7                | 63                                | ppm          |
| Area C Purlin   | 11/02/11    | G8                | 121                               | ppm          |
| Area C Purlin   | 11/02/11    | G9                | 43                                | ppm          |
| Area C Purlin   | 11/02/11    | G4                | 561                               | ppm          |
| Area C Purlin   | 11/02/11    | G4                | 535                               | ppm          |
| Area C Purlin   | 11/02/11    | C9                | 542                               | ppm          |
| Area C Purlin   | 11/02/11    | C9                | 538                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C Purlin   | 11/02/11    | C9                | 503                               | ppm          |
| Area C Purlin   | 11/02/11    | E5                | 1779                              | ppm          |
| Area C Purlin   | 11/02/11    | H1                | 13                                | ppm          |
| Area C Purlin   | 11/02/11    | H2                | 62                                | ppm          |
| Area C Purlin   | 11/02/11    | H3                | 43                                | ppm          |
| Area C Purlin   | 11/02/11    | H4                | 24                                | ppm          |
| Area C Purlin   | 11/02/11    | H5                | 83                                | ppm          |
| Area C Purlin   | 11/02/11    | H6                | 37                                | ppm          |
| Area C Purlin   | 11/02/11    | H6                | 27                                | ppm          |
| Area C Purlin   | 11/02/11    | H7                | 41                                | ppm          |
| Area C Purlin   | 11/02/11    | H8                | 91                                | ppm          |
| Area C Purlin   | 11/02/11    | H8                | 78                                | ppm          |
| Area C Purlin   | 11/02/11    | H9                | 51                                | ppm          |
| Area C Purlin   | 11/02/11    | H9                | 560                               | ppm          |
| Area C Purlin   | 11/02/11    | I1                | 444                               | ppm          |
| Area C Purlin   | 11/02/11    | I1                | 1435                              | ppm          |
| Area C Purlin   | 11/02/11    | I1                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | I1                | 1222                              | ppm          |
| Area C Purlin   | 11/03/11    | I1                | 1227                              | ppm          |
| Area C Purlin   | 11/03/11    | I2                | 197                               | ppm          |
| Area C Purlin   | 11/03/11    | I2                | 224                               | ppm          |
| Area C Purlin   | 11/03/11    | I2                | 261                               | ppm          |
| Area C Purlin   | 11/03/11    | I3                | 53                                | ppm          |
| Area C Purlin   | 11/03/11    | I1                | 958                               | ppm          |
| Area C Purlin   | 11/03/11    | I4                | 365                               | ppm          |
| Area C Purlin   | 11/03/11    | I5                | 544                               | ppm          |
| Area C Purlin   | 11/03/11    | I5                | 118                               | ppm          |
| Area C Purlin   | 11/03/11    | I5                | 162                               | ppm          |
| Area C Purlin   | 11/03/11    | I6                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | I6                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | I6                | 23                                | ppm          |
| Area C Purlin   | 11/03/11    | I7                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | I7                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | I7                | 23                                | ppm          |
| Area C Purlin   | 11/03/11    | I8                | 84                                | ppm          |
| Area C Purlin   | 11/03/11    | I8                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | I8                | 67                                | ppm          |
| Area C Purlin   | 11/03/11    | I8                | 34                                | ppm          |
| Area C Purlin   | 11/03/11    | I8                | 41                                | ppm          |
| Area C Purlin   | 11/03/11    | I9                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | I9                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | I9                | 50                                | ppm          |
| Area C Purlin   | 11/03/11    | J1                | 20                                | ppm          |
| Area C Purlin   | 11/03/11    | J1                | 26                                | ppm          |
| Area C Purlin   | 11/03/11    | J2                | 118                               | ppm          |
| Area C Purlin   | 11/03/11    | J2                | 97                                | ppm          |
| Area C Purlin   | 11/03/11    | J3                | 195                               | ppm          |



**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C Purlin   | 11/03/11    | J4                | 86                                | ppm          |
| Area C Purlin   | 11/03/11    | J5                | 16                                | ppm          |
| Area C Purlin   | 11/03/11    | J6                | 24                                | ppm          |
| Area C Purlin   | 11/03/11    | J7                | 23                                | ppm          |
| Area C Purlin   | 11/03/11    | J8                | 19                                | ppm          |
| Area C Purlin   | 11/03/11    | J9                | 32                                | ppm          |
| Area C Purlin   | 11/03/11    | J1                | 26                                | ppm          |
| Area C Purlin   | 11/03/11    | J2                | 13                                | ppm          |
| Area C Purlin   | 11/03/11    | J3                | 34                                | ppm          |
| Area C Purlin   | 11/03/11    | J4                | 18                                | ppm          |
| Area C Purlin   | 11/03/11    | J5                | < LOD                             | ppm          |
| Area C Purlin   | 11/03/11    | J5                | 18                                | ppm          |
| Area C Purlin   | 11/03/11    | J6                | 19                                | ppm          |
| Area C Ceiling  | 11/03/11    | J7                | 10                                | ppm          |
| Area C Ceiling  | 11/03/11    | J8                | 13                                | ppm          |
| Area C Ceiling  | 11/03/11    | J9                | 9                                 | ppm          |
| Area C Ceiling  | 11/03/11    | I1                | 22                                | ppm          |
| Area C Ceiling  | 11/03/11    | I2                | 34                                | ppm          |
| Area C Ceiling  | 11/03/11    | I3                | 20                                | ppm          |
| Area C Ceiling  | 11/03/11    | I4                | 13                                | ppm          |
| Area C Ceiling  | 11/03/11    | I5                | 19                                | ppm          |
| Area C Ceiling  | 11/03/11    | I6                | 16                                | ppm          |
| Area C Ceiling  | 11/03/11    | I7                | 23                                | ppm          |
| Area C Ceiling  | 11/03/11    | I8                | < LOD                             | ppm          |
| Area C Ceiling  | 11/03/11    | I8                | 31                                | ppm          |
| Area C Ceiling  | 11/03/11    | I9                | 12                                | ppm          |
| Area C Ceiling  | 11/03/11    | H1                | 35                                | ppm          |
| Area C Ceiling  | 11/03/11    | H2                | 39                                | ppm          |
| Area C Ceiling  | 11/03/11    | H3                | 25                                | ppm          |
| Area C Ceiling  | 11/03/11    | H4                | 25                                | ppm          |
| Area C Ceiling  | 11/03/11    | H5                | 14                                | ppm          |
| Area C Ceiling  | 11/03/11    | H6                | 20                                | ppm          |
| Area C Ceiling  | 11/03/11    | H7                | 30                                | ppm          |
| Area C Ceiling  | 11/03/11    | H8                | 33                                | ppm          |
| Area C Ceiling  | 11/03/11    | H9                | 18                                | ppm          |
| Area C Ceiling  | 11/03/11    | G1                | 17                                | ppm          |
| Area C Ceiling  | 11/03/11    | G2                | 16                                | ppm          |
| Area C Ceiling  | 11/03/11    | G3                | 13                                | ppm          |
| Area C Ceiling  | 11/03/11    | G4                | 11                                | ppm          |
| Area C Ceiling  | 11/03/11    | G5                | < LOD                             | ppm          |
| Area C Ceiling  | 11/03/11    | G5                | 29                                | ppm          |
| Area C Ceiling  | 11/03/11    | G6                | 31                                | ppm          |
| Area C Ceiling  | 11/03/11    | G7                | 20                                | ppm          |
| Area C Ceiling  | 11/03/11    | G8                | 24                                | ppm          |
| Area C Ceiling  | 11/03/11    | G9                | 13                                | ppm          |
| Area C Ceiling  | 11/03/11    | F1                | 15                                | ppm          |
| Area C Ceiling  | 11/03/11    | F2                | 21                                | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b> | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-----------------|-------------|-------------------|-----------------------------------|--------------|
| Area C Ceiling  | 11/03/11    | F3                | < LOD                             | ppm          |
| Area C Ceiling  | 11/03/11    | F3                | 32                                | ppm          |
| Area C Ceiling  | 11/03/11    | F4                | 26                                | ppm          |
| Area C Ceiling  | 11/03/11    | F5                | 26                                | ppm          |
| Area C Ceiling  | 11/03/11    | F6                | 21                                | ppm          |
| Area C Ceiling  | 11/03/11    | F7                | < LOD                             | ppm          |
| Area C Ceiling  | 11/03/11    | F7                | 16                                | ppm          |
| Area C Ceiling  | 11/03/11    | F8                | 29                                | ppm          |
| Area C Ceiling  | 11/03/11    | F9                | 10                                | ppm          |
| Area C Ceiling  | 11/03/11    | E1                | 13                                | ppm          |
| Area C Ceiling  | 11/03/11    | E2                | 23                                | ppm          |
| Area C Ceiling  | 11/03/11    | E3                | < LOD                             | ppm          |
| Area C Ceiling  | 11/03/11    | E3                | 49                                | ppm          |
| Area C Ceiling  | 11/03/11    | E4                | 39                                | ppm          |
| Area C Ceiling  | 11/03/11    | E5                | 27                                | ppm          |
| Area C Ceiling  | 11/03/11    | E6                | 23                                | ppm          |
| Area C Ceiling  | 11/03/11    | E6                | 29                                | ppm          |
| Area C Ceiling  | 11/03/11    | E7                | 40                                | ppm          |
| Area C Ceiling  | 11/03/11    | E8                | 29                                | ppm          |
| Area C Ceiling  | 11/03/11    | E8                | 17                                | ppm          |
| Area C Ceiling  | 11/03/11    | D1                | 16                                | ppm          |
| Area C Ceiling  | 11/03/11    | D2                | 15                                | ppm          |
| Area C Ceiling  | 11/03/11    | D3                | 17                                | ppm          |
| Area C Ceiling  | 11/03/11    | D4                | 25                                | ppm          |
| Area C Ceiling  | 11/03/11    | D5                | 17                                | ppm          |
| Area C Ceiling  | 11/03/11    | D6                | 24                                | ppm          |
| Area C Ceiling  | 11/03/11    | D7                | 30                                | ppm          |
| Area C Ceiling  | 11/03/11    | D7                | 38                                | ppm          |
| Area C Ceiling  | 11/03/11    | D8                | 24                                | ppm          |
| Area C Ceiling  | 11/03/11    | F9                | 51                                | ppm          |
| Area C Ceiling  | 11/03/11    | D9                | 17                                | ppm          |
| Area C Ceiling  | 11/03/11    | C1                | 12                                | ppm          |
| Area C Ceiling  | 11/03/11    | C2                | 11                                | ppm          |
| Area C Ceiling  | 11/03/11    | C3                | 17                                | ppm          |
| Area C Ceiling  | 11/03/11    | C4                | 18                                | ppm          |
| Area C Ceiling  | 11/03/11    | C5                | 17                                | ppm          |
| Area C Ceiling  | 11/03/11    | C6                | 15                                | ppm          |
| Area C Ceiling  | 11/03/11    | C7                | 10                                | ppm          |
| Area C Ceiling  | 11/03/11    | C8                | 83                                | ppm          |
| Area C Ceiling  | 11/03/11    | C9                | 67                                | ppm          |
| Area C Ceiling  | 11/03/11    | B1                | 21                                | ppm          |
| Area C Ceiling  | 11/03/11    | B2                | 12                                | ppm          |
| Area C Ceiling  | 11/03/11    | B3                | 21                                | ppm          |
| Area C Ceiling  | 11/03/11    | B4                | 11                                | ppm          |
| Area C Ceiling  | 11/03/11    | B5                | 36                                | ppm          |
| Area C Ceiling  | 11/03/11    | B6                | 27                                | ppm          |
| Area C Ceiling  | 11/03/11    | B7                | 76                                | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| <b>Location</b>   | <b>Date</b> | <b>Sample I.D</b> | <b>XRF Lead Screening Results</b> | <b>Units</b> |
|-------------------|-------------|-------------------|-----------------------------------|--------------|
| Area C Ceiling    | 11/03/11    | B8                | 74                                | ppm          |
| Area C Ceiling    | 11/03/11    | B9                | 35                                | ppm          |
| Area C Ceiling    | 11/03/11    | A1                | 17                                | ppm          |
| Area C Ceiling    | 11/03/11    | A2                | 7                                 | ppm          |
| Area C Ceiling    | 11/03/11    | A3                | 24                                | ppm          |
| Area C Ceiling    | 11/03/11    | A4                | 39                                | ppm          |
| Area C Ceiling    | 11/03/11    | A5                | 42                                | ppm          |
| Area C Ceiling    | 11/03/11    | A6                | 32                                | ppm          |
| Area C Ceiling    | 11/03/11    | A7                | 24                                | ppm          |
| Area C Ceiling    | 11/03/11    | A8                | 61                                | ppm          |
| Area C Ceiling    | 11/03/11    | A9                | 43                                | ppm          |
| Area C Right Side | 11/03/11    | A1                | 24                                | ppm          |
| Area C Right Side | 11/03/11    | A2                | 420                               | ppm          |
| Area C Right Side | 11/03/11    | A3                | 12                                | ppm          |
| Area C Right Side | 11/03/11    | A4                | 84                                | ppm          |
| Area C Right Side | 11/03/11    | A5                | 69                                | ppm          |
| Area C Right Side | 11/03/11    | A2                | 127                               | ppm          |
| Area C Right Side | 11/03/11    | A2                | 132                               | ppm          |
| Area C Right Side | 11/03/11    | A6                | 610                               | ppm          |
| Area C Right Side | 11/03/11    | A6                | 41                                | ppm          |
| Area C Right Side | 11/03/11    | A7                | 115                               | ppm          |
| Area C Right Side | 11/03/11    | A7                | 157                               | ppm          |
| Area C Right Side | 11/03/11    | A8                | 138                               | ppm          |
| Area C Right Side | 11/03/11    | A9                | 346                               | ppm          |
| Area C Right Side | 11/03/11    | A10               | 48                                | ppm          |
| Area C Right Side | 11/03/11    | B1                | 16                                | ppm          |
| Area C Right Side | 11/03/11    | B2                | 12                                | ppm          |
| Area C Right Side | 11/03/11    | B3                | 21                                | ppm          |
| Area C Right Side | 11/03/11    | B4                | 32                                | ppm          |
| Area C Right Side | 11/03/11    | B5                | 26                                | ppm          |
| Area C Right Side | 11/03/11    | B6                | 10                                | ppm          |
| Area C Right Side | 11/03/11    | B7                | 127                               | ppm          |
| Area C Right Side | 11/03/11    | B8                | 29                                | ppm          |
| Area C Right Side | 11/03/11    | B9                | 10                                | ppm          |
| Area C Right Side | 11/03/11    | B10               | 53                                | ppm          |
| Area C Right Side | 11/03/11    | C1                | 279                               | ppm          |
| Area C Right Side | 11/03/11    | C2                | 114                               | ppm          |
| Area C Right Side | 11/03/11    | C2                | 125                               | ppm          |
| Area C Right Side | 11/03/11    | C3                | 256                               | ppm          |
| Area C Right Side | 11/03/11    | C3                | 253                               | ppm          |
| Area C Right Side | 11/03/11    | C4                | 75                                | ppm          |
| Area C Right Side | 11/03/11    | C5                | 279                               | ppm          |
| Area C Right Side | 11/03/11    | C6                | 90                                | ppm          |
| Area C Right Side | 11/03/11    | C7                | 55                                | ppm          |
| Area C Right Side | 11/03/11    | C8                | 209                               | ppm          |
| Area C Right Side | 11/03/11    | C9                | 112                               | ppm          |

**TABLE 4**  
**Welch Environmental Group**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**WGE XRF Data for Area C**

| Location          | Date     | Sample I.D | XRF Lead Screening Results | Units |
|-------------------|----------|------------|----------------------------|-------|
| Area C Right Side | 11/03/11 | C10        | 33                         | ppm   |

Notes:

- 1) Data summarized were collected by WGE.
- 2) XRF - X-ray Fluoresence
- 3) I.D - Identification
- 4) ppm - parts per million

**TABLE 5**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area C**

| Location              | Date     | Sample I.D | XRF Lead Screening Results | Units |
|-----------------------|----------|------------|----------------------------|-------|
| <b>Concrete Floor</b> |          |            |                            |       |
| Area C                | 11/02/11 | A22        | 106                        | ppm   |
| Area C                | 11/02/11 | A16        | 333                        | ppm   |
| Area C                | 11/02/11 | A6         | 176                        | ppm   |
| Area C                | 11/02/11 | B4         | 500                        | ppm   |
| Area C                | 11/02/11 | B12        | 250                        | ppm   |
| Area C                | 11/02/11 | B20        | 249                        | ppm   |
| Area C                | 11/02/11 | C23        | 338                        | ppm   |
| Area C                | 11/02/11 | C17        | 62                         | ppm   |
| Area C                | 11/02/11 | C8         | 202                        | ppm   |
| Area C                | 11/02/11 | D2         | 249                        | ppm   |
| Area C                | 11/02/11 | D14        | 108                        | ppm   |
| Area C                | 11/02/11 | D21        | 913                        | ppm   |
| Area C                | 11/02/11 | E23        | 659                        | ppm   |
| Area C                | 11/02/11 | E18        | 253                        | ppm   |
| Area C                | 11/02/11 | E4         | 158                        | ppm   |
| Area C                | 11/02/11 | F7         | 140                        | ppm   |
| Area C                | 11/02/11 | F15        | 301                        | ppm   |
| Area C                | 11/02/11 | F22        | 127                        | ppm   |
| Area C                | 11/02/11 | G24        | 158                        | ppm   |
| Area C                | 11/02/11 | G11        | 151                        | ppm   |
| Area C                | 11/02/11 | G4         | 416                        | ppm   |
| Area C                | 11/02/11 | H6         | 65                         | ppm   |
| Area C                | 11/02/11 | H17        | 164                        | ppm   |
| Area C                | 11/02/11 | H25        | 640                        | ppm   |
| Area C                | 11/02/11 | I23        | 326                        | ppm   |
| Area C                | 11/02/11 | I14        | 129                        | ppm   |
| Area C                | 11/02/11 | I7         | 400                        | ppm   |
| Area C                | 11/02/11 | J3         | 311                        | ppm   |
| Area C                | 11/02/11 | J12        | 497                        | ppm   |
| Area C                | 11/02/11 | J21        | 309                        | ppm   |
| Area C                | 11/02/11 | K24        | 442                        | ppm   |
| Area C                | 11/02/11 | K15        | 338                        | ppm   |
| Area C                | 11/02/11 | K5         | 353                        | ppm   |
| Area C                | 11/02/11 | L1         | 127                        | ppm   |
| Area C                | 11/02/11 | L9         | 142                        | ppm   |
| Area C                | 11/02/11 | L19        | 556                        | ppm   |
| Area C                | 11/02/11 | M22        | 257                        | ppm   |
| Area C                | 11/02/11 | M13        | 1198                       | ppm   |
| Area C                | 11/02/11 | M7         | 1016                       | ppm   |

**TABLE 5**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area C**

| Location                   | Date     | Sample I.D | XRF Lead Screening Results | Units |
|----------------------------|----------|------------|----------------------------|-------|
| Area C                     | 11/02/11 | N3         | 929                        | ppm   |
| Area C                     | 11/02/11 | N16        | 271                        | ppm   |
| Area C                     | 11/02/11 | N24        | 173                        | ppm   |
| Area C                     | 11/02/11 | O20        | 380                        | ppm   |
| Area C                     | 11/02/11 | O11        | 99                         | ppm   |
| Area C                     | 11/02/11 | O5         | 716                        | ppm   |
| Area C                     | 11/02/11 | P1         | 276                        | ppm   |
| Area C                     | 11/02/11 | P18        | 110                        | ppm   |
| Area C                     | 11/02/11 | P23        | 875                        | ppm   |
| Area C                     | 11/02/11 | Q21        | 101                        | ppm   |
| Area C                     | 11/02/11 | Q14        | 401                        | ppm   |
| Area C                     | 11/02/11 | Q7         | 117                        | ppm   |
| Area C                     | 11/02/11 | R4         | 243                        | ppm   |
| Area C                     | 11/02/11 | R12        | 267                        | ppm   |
| Area C                     | 11/02/11 | R22        | 111                        | ppm   |
| Area C                     | 11/02/11 | S25        | 131                        | ppm   |
| Area C                     | 11/02/11 | S10        | 206                        | ppm   |
| Area C                     | 11/02/11 | S1         | 414                        | ppm   |
| Area C                     | 11/02/11 | T8         | 110                        | ppm   |
| Area C                     | 11/02/11 | T17        | 79                         | ppm   |
| Area C                     | 11/02/11 | T23        | 64                         | ppm   |
| Area C                     | 11/02/11 | U24        | 57                         | ppm   |
| Area C                     | 11/02/11 | U14        | 280                        | ppm   |
| Area C                     | 11/02/11 | U3         | 372                        | ppm   |
| Area C                     | 11/02/11 | V6         | 112                        | ppm   |
| Area C                     | 11/02/11 | V16        | 172                        | ppm   |
| Area C                     | 11/02/11 | V23        | 50                         | ppm   |
| Area C                     | 11/02/11 | W24        | 142                        | ppm   |
| Area C                     | 11/02/11 | W11        | 102                        | ppm   |
| Area C                     | 11/02/11 | W1         | 72                         | ppm   |
| <b>Miscellaneous Items</b> |          |            |                            |       |
| Area C                     | 05/26/11 | Chair 1    | 325                        | ppm   |
| Area C                     | 05/26/11 | Chair 1    | 45                         | ppm   |
| Area C                     | 05/26/11 | Chair 2    | 1096                       | ppm   |
| Area C                     | 05/26/11 | Chair 2    | 398                        | ppm   |
| Area C                     | 05/26/11 | Chair 3    | 1989                       | ppm   |
| Area C                     | 05/26/11 | Chair 3    | 167                        | ppm   |
| Area C                     | 05/26/11 | Desk 12    | 643                        | ppm   |
| Area C                     | 05/26/11 | Desk 12    | 173                        | ppm   |
| Area C                     | 05/26/11 | Desk 12    | 19                         | ppm   |

**TABLE 5**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area C**

| Location                  | Date     | Sample I.D       | XRF Lead Screening Results | Units |
|---------------------------|----------|------------------|----------------------------|-------|
| Area C                    | 05/26/11 | Desk 4           | 3696                       | ppm   |
| Area C                    | 05/26/11 | Desk 4           | 230                        | ppm   |
| Area C                    | 05/26/11 | Desk 7           | 25                         | ppm   |
| Area C                    | 05/26/11 | Filing Cabinet 1 | 595                        | ppm   |
| Area C                    | 05/26/11 | Filing Cabinet 1 | 33                         | ppm   |
| Area C                    | 05/26/11 | Gym Equip        | 2081                       | ppm   |
| Area C                    | 05/26/11 | Gym Equip        | 415                        | ppm   |
| Area C                    | 05/26/11 | Gym Equip        | 246                        | ppm   |
| Area C                    | 05/26/11 | Table 2          | 818                        | ppm   |
| Area C                    | 05/26/11 | Table 2          | 104                        | ppm   |
| Area C                    | 11/02/11 | Firehose         | 4339                       | ppm   |
| Area C                    | 11/02/11 | Wood Shelves 1   | 391                        | ppm   |
| Area C                    | 11/02/11 | Wood Shelves 2   | 95                         | ppm   |
| Area C                    | 11/02/11 | Wood Shelves 3   | 927                        | ppm   |
| Area C                    | 11/02/11 | Wood Shelves 4   | 741                        | ppm   |
| <b>Wall Panels</b>        |          |                  |                            |       |
| Area C                    | 11/03/11 | A1               | 438                        | ppm   |
| Area C                    | 11/03/11 | A3               | 243                        | ppm   |
| Area C                    | 11/03/11 | B2               | 860                        | ppm   |
| Area C                    | 11/03/11 | C1               | 181                        | ppm   |
| Area C                    | 11/03/11 | C3               | 1725                       | ppm   |
| Area C                    | 11/03/11 | D1               | 134                        | ppm   |
| Area C                    | 11/03/11 | D3               | 51                         | ppm   |
| Area C                    | 11/03/11 | E2               | 24                         | ppm   |
| Area C                    | 11/03/11 | F1               | 11                         | ppm   |
| Area C                    | 11/03/11 | F3               | ND                         | ppm   |
| <b>Red Steel</b>          |          |                  |                            |       |
| Area C                    | 11/03/11 | A5               | ND                         | ppm   |
| Area C                    | 11/03/11 | C2               | 124                        | ppm   |
| Area C                    | 11/03/11 | C8               | 282                        | ppm   |
| Area C                    | 11/03/11 | D2               | 764                        | ppm   |
| Area C                    | 11/03/11 | D3               | 64                         | ppm   |
| Area C                    | 11/03/11 | D5               | 216                        | ppm   |
| <b>Ceiling Insulation</b> |          |                  |                            |       |
| Area C                    | 11/03/11 | A4               | 21                         | ppm   |
| Area C                    | 11/03/11 | A6               | 24                         | ppm   |
| Area C                    | 11/03/11 | C4               | 37                         | ppm   |
| Area C                    | 11/03/11 | D3               | ND                         | ppm   |
| Area C                    | 11/03/11 | D6               | ND                         | ppm   |
| Area C                    | 11/03/11 | D9               | ND                         | ppm   |

**TABLE 5**  
**Welch Group Environmental**  
**110 Palmetto Parkway**  
**Belton, Anderson County, South Carolina**  
**Summary of XRF Confirmation Data Area C**

| Location        | Date     | Sample I.D | XRF Lead Screening Results | Units |
|-----------------|----------|------------|----------------------------|-------|
| Area C          | 11/03/11 | E1         | ND                         | ppm   |
| Area C          | 11/03/11 | E7         | 10                         | ppm   |
| Area C          | 11/03/11 | G7         | 15                         | ppm   |
| Area C          | 11/03/11 | H5         | ND                         | ppm   |
| Area C          | 11/03/11 | I2         | ND                         | ppm   |
| Area C          | 11/03/11 | J5         | 12                         | ppm   |
| <b>Pirlings</b> |          |            |                            |       |
| Area C          | 11/03/11 | A1         | 15                         | ppm   |
| Area C          | 11/03/11 | A7         | 15                         | ppm   |
| Area C          | 11/03/11 | B8         | 83                         | ppm   |
| Area C          | 11/03/11 | C7         | ND                         | ppm   |
| Area C          | 11/03/11 | F1         | ND                         | ppm   |
| Area C          | 11/03/11 | F6         | 19                         | ppm   |
| Area C          | 11/03/11 | F6         | 16                         | ppm   |
| Area C          | 11/03/11 | G3         | 11                         | ppm   |
| Area C          | 11/03/11 | G6         | 16                         | ppm   |
| Area C          | 11/03/11 | J1         | ND                         | ppm   |
| Area C          | 11/03/11 | J6         | 24                         | ppm   |
| Area C          | 11/03/11 | J9         | 19                         | ppm   |

Notes:

- 1) XRF - X-Ray Fluorescence
- 2) I.D - Identification
- 3) ppm - parts per million
- 4) ND - Non-Detect



**APPENDIX C**  
**WGE FIELD DATA**

Reference 1) WGE Grid of Floor of the Shared Pathway

Reference 2) WGE Grid of Area A Floor

Reference 3) WGE XRF Data Area B (Girders Red Steel, Wall Panels, Purlins, Posts)

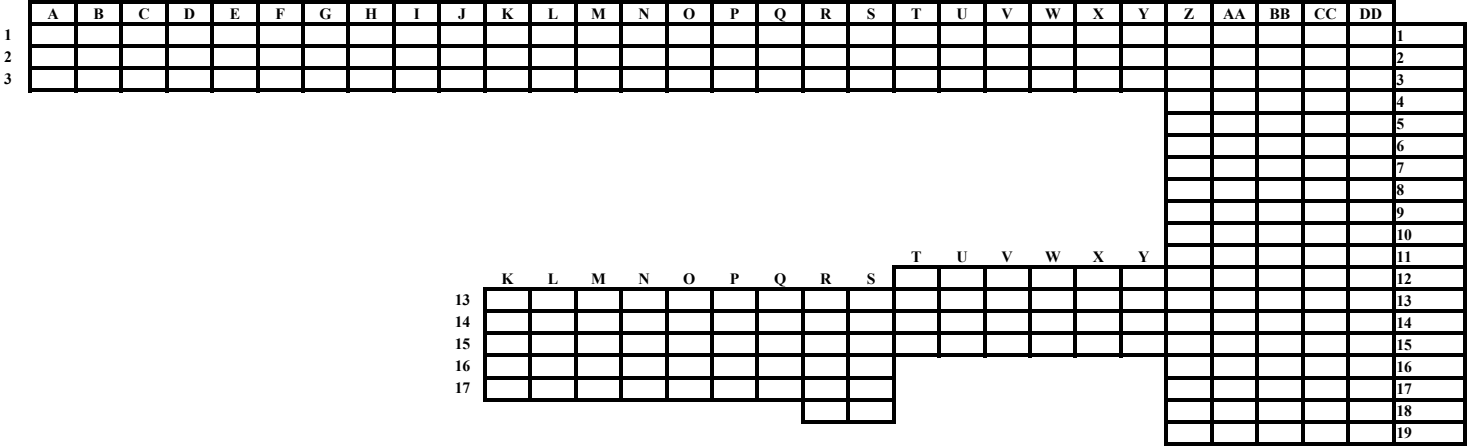
WGE Grid Area B (Girders, Ceiling, Purlins, Posts, Wall Panels)

Reference 4) WGE Grid of Area B Floor

Reference 5) WGE Grid of area C Floor

EACH SQUARE = 2'x2'

← N



LOADING DOCK

PALMETTO PARKWAY SHARED ACCESS PATHWAY XRF READING GRID

Reference 1  
Grid Provided By WGE

\*Grid Not to Scale

← N

EACH SQUARE = 2'X2'

| D | E | F | G | H | I | J | K | L | M | N | O | P |    |
|---|---|---|---|---|---|---|---|---|---|---|---|---|----|
|   |   |   |   |   |   |   |   |   |   |   |   |   | 1  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 2  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 3  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 4  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 5  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 6  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 7  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 8  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 9  |
|   |   |   |   |   |   |   |   |   |   |   |   |   | 10 |

**Palmetto Parkway Area A**  
Reference 2  
Grid Provided By WGE

\*Grid not to Scale

# Reference 3

## Supporting Field Data Provided by WGE

| ITREH V<br>PERLIN (RED STEEL) |                   |                |                  |
|-------------------------------|-------------------|----------------|------------------|
| P1A-12.6 ± 6.3                | P2A-LOD=7.8       | P3A-11.3 ± 6.3 | P4A-29.1 ± 7.3   |
| B-19.3 ± 7.1                  | B-LOD=7.4         | B-73.4 ± 16.2  | B-60.6 ± 4.8     |
| C-93.0 ± 10.7                 | C-LOD=7.4         | C-16.3 ± 6.8   | C-219.1 ± 16.2   |
| D-LOD=8.6                     | D-LOD=7.7         | D-24.3-7.3     | D-393.7 ± 21.3   |
| E-196.4 ± 14.8                | E-81.3 ± 10.6     | E-17.6 ± 6.9   | E-522.9 ± 17.2   |
| F-70.5 ± 9.3                  | F-64.5 ± 9.5      | F-30.4 ± 7.7   | F-110.1 ± 11.9   |
| G-55.9 ± 9.0                  | G-41.0 ± 9.1      | G-139.5 ± 13.6 | G-32.5 ± 7.6     |
| H-35.8 ± 7.7                  | H-LOD=5.8         | H-54.1 ± 9.1   | H-96.8 ± 12.0    |
| I-10.7 ± 5.5                  | I-LOD=8.7         | I-121.3 ± 13.1 | I-48.5 ± 8.8     |
|                               |                   |                |                  |
| P5A-273.6 ± 17.2              | P6A-100.5 ± 11.3  | P7A-64.5 ± 9.7 | P8A-340.0 ± 17.3 |
| B-11.2 ± 8.1                  | B-LOD=7.1         | B-129.8 ± 12.9 | B-172.1 ± 14.0   |
| C-81 ± 10.7                   | C-LOD=7.4         | C-26.1 ± 6.7   | C-144.9 ± 12.1   |
| D-26.1 ± 7.2                  | D-144.9 ± 13.4    | D-222.5 ± 15   | D-94.8 ± 10.6    |
| E-32.1 ± 8.2                  | E-140 ± 12.0      | E-76.3 ± 10.3  | E-55.3 ± 8.0     |
| F-61.1 ± 9.4                  | F-69.4 ± 9        | F-43.1 ± 7.8   | F-73.3 ± 9.6     |
| G-183.3 ± 13.9                | G-138.4 ± 12.3    | G-131.5 ± 12.0 | G-156.4 ± 13.6   |
| H-32.6 ± 8.0                  | H-149.9 ± 13.9    | H-135.7 ± 11.8 | H-151.9 ± 13.0   |
| <del>E</del>                  | <del>PERLIN</del> | I-146.5 ± 12.4 | I-71.1 ± 9.3     |
|                               |                   |                |                  |
| P9A-126.8 ± 12.8              | P10A-340.0 ± 17.3 |                |                  |
| B-60.4 ± 9.3                  | B-79.3 ± 10.2     |                |                  |
| C-213.1 ± 15.3                | C-19.1 ± 6.4      |                |                  |
| D-169.9 ± 14.2                | D-31.6 ± 7.9      |                |                  |
| E-73.3 ± 10.0                 | E-91.4 ± 11.2     |                |                  |
| F-249.7 ± 18.7                | F-41.0 ± 8.0      |                |                  |
| G-124.1 ± 11.3                | G-LOD=8.3         |                |                  |
| H-99.6 ± 10.6                 | H-57.6 ± 9.2      |                |                  |
| I-67.9 ± 9.2                  | I-204.2 ± 14.5    |                |                  |

# Reference 3

## Supporting Field Data Provided by WGE

### AREA B wall panels

A1 - 36.5 7.8  
A2 - 51.2 7.9  
A3 - 258.2 15.7

F1 - 19.9 6.4  
F2 - 11.8 5.8  
F3 - 21.3 6.6

K1 - 400 7.0  
K2 - ~~400~~ 2.1 9.9 5.6  
K3 - 400 7.8

B1 - 95.9 10.2  
B2 - 139.5 11.5  
B3 - 225.5 15.1

G1 - 400 31.5  
G2 - 108 11.4  
G3 - 145.6 12.6

L1 - 400 7.5  
L2 - 11.9 5.5  
L3 - 18.1 6.1

C1 - 91.9 10.4  
C2 - 160.8 13.4  
\* C3 - 400 6.5

H1 - 400 7.1  
H2 - 400 2.1  
H3 - 135.5 12.7

D1 - 14.4 6.0  
D2 - 27.2 6.8  
D3 - 34.7 7.3

I1 - 400 6.9  
I2 - 37.5 8.1  
I3 - 119.9 12.7

E1 - 27.6 6.8  
E2 - 37.4 7.5  
E3 - 28.8 7.2

J1 - 400 7.6  
J2 - 400 ~~7.0~~  
J3 - ~~80.7~~ 9.9 22.5 6.6

C3 - 565.6 23.9



### Reference 3

#### Supporting Field Data Provided by WGE

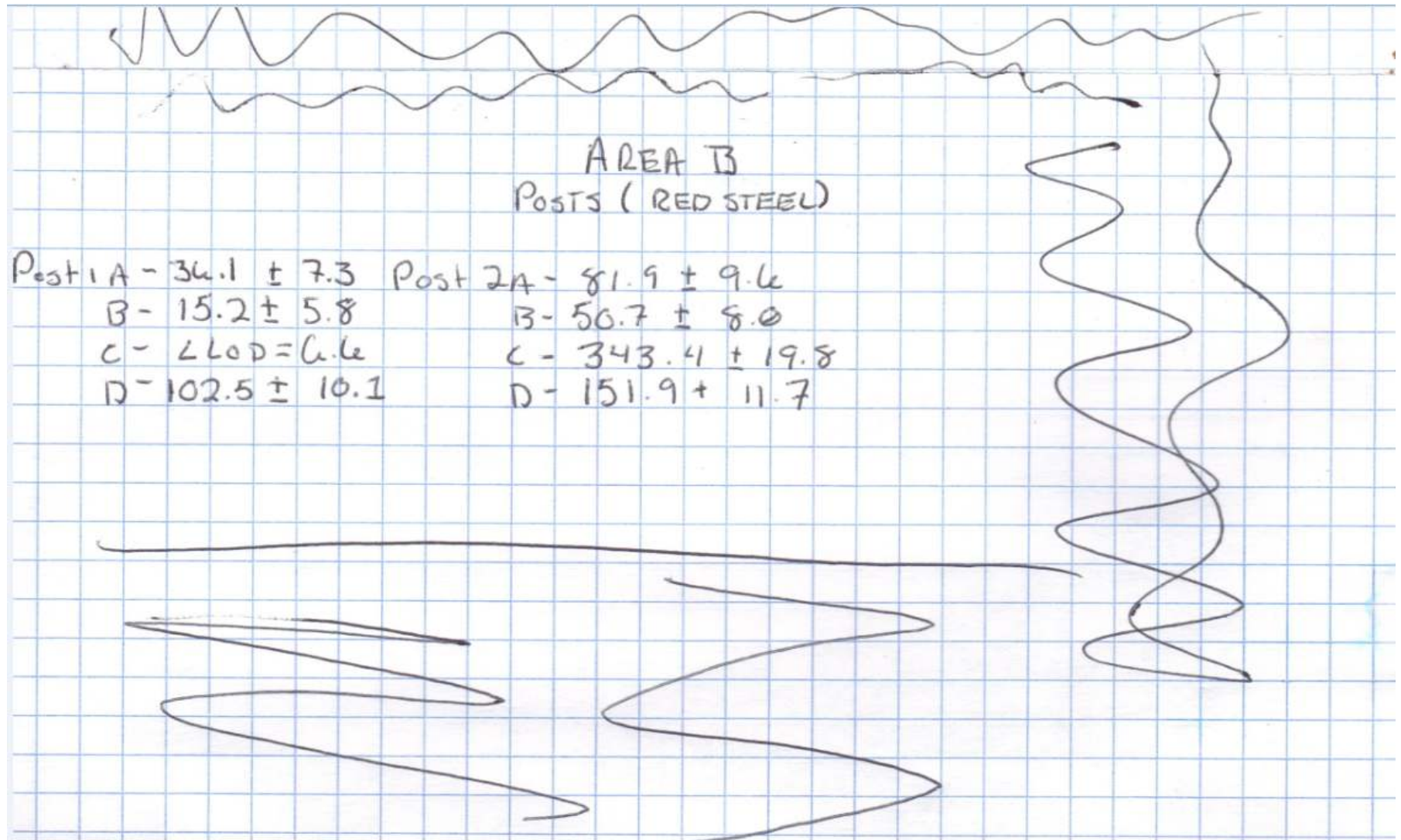
AREA B  
Girders (RED STEEL)

G1A-  $37.9 \pm 7.9$   
B-  $122.1 \pm 12.6$   
C-  $301 \pm 18.5$   
D-  $107.1 \pm 11.3$   
E-  $11.3 \pm 6.2$   
F-  $91.0 \pm 10.5$   
G-  $90.6 \pm 10.6$   
H-  $147.3 \pm 13.4$

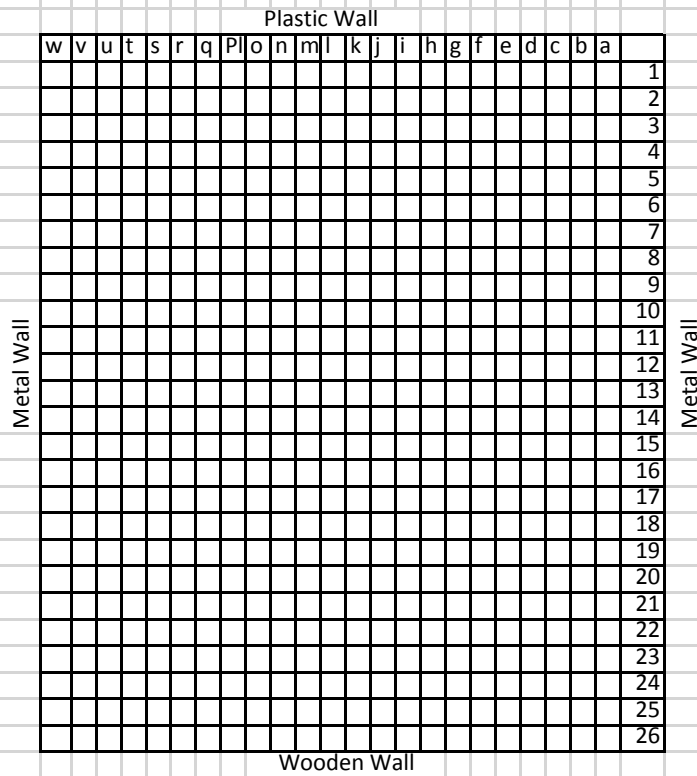
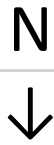
G2A-  $204.5 \pm 15.4$   
B-  $176.0 \pm 14.0$   
\*C-  $551.8 \pm 22.7$  ~~~~~ 137.9  
D-  $49.5 \pm 8.1$   
\*E-  $46.8 \pm 8.1$   
F-  $21.2 \pm 7.0$   
G-  $46.8 \pm 8.6$   
H-  $55.4 \pm 8.8$   
I-  $159.3 \pm 14.0$   
J-  $90.4 \pm 10.8$   
K-  $145.3 \pm 12.8$   
L-  $48.5 \pm 8.5$   
M-  $< LOD = 7.5$

### Reference 3

### Supporting Field Data Provided by WGE



# Area C Floor



\*Grid Not to Scale

**Reference**  
**Grid Provided By WGE**



Area B Floor

N →

crz zone/Plastic Wall

|    | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p | q | r | s | t | u | v |
|----|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 2  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 3  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 4  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 5  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 6  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 7  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 8  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 9  |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 10 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 11 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 12 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 13 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 14 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 15 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 16 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 17 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 18 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 19 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 20 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 21 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 22 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 23 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 24 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 25 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| 26 |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |

Metal Wall

Plastic Wall

Metal Wall

\*Grid Not to Scale

**Reference 4**  
**Grid Provided By WGE**

### Area B Girder



## Plastic Wall

g1

g2

g3

|    |  |
|----|--|
| g4 |  |
|----|--|

g5

g6

g7

g8

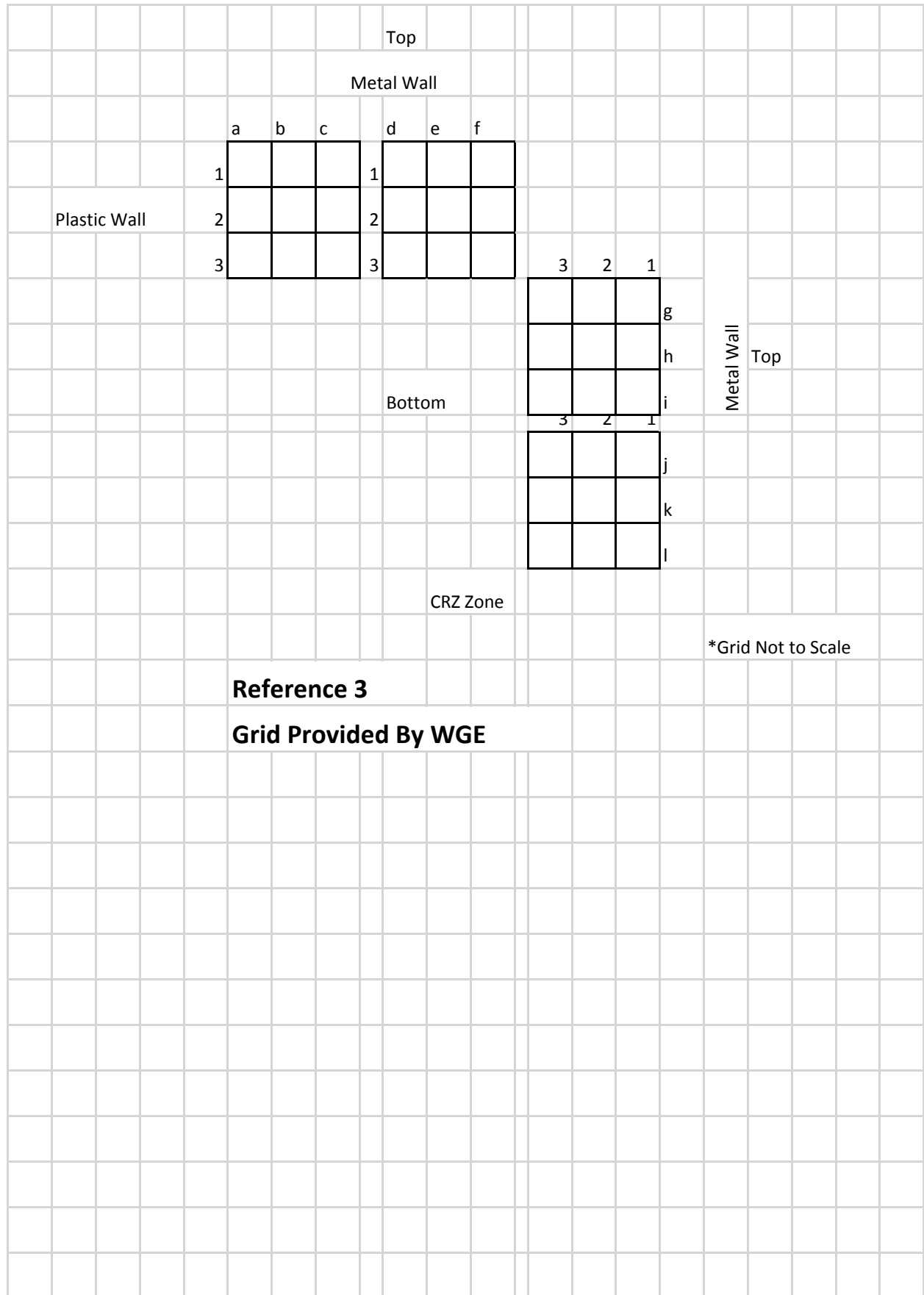
Metal Wall

\*Grid Not to Scale

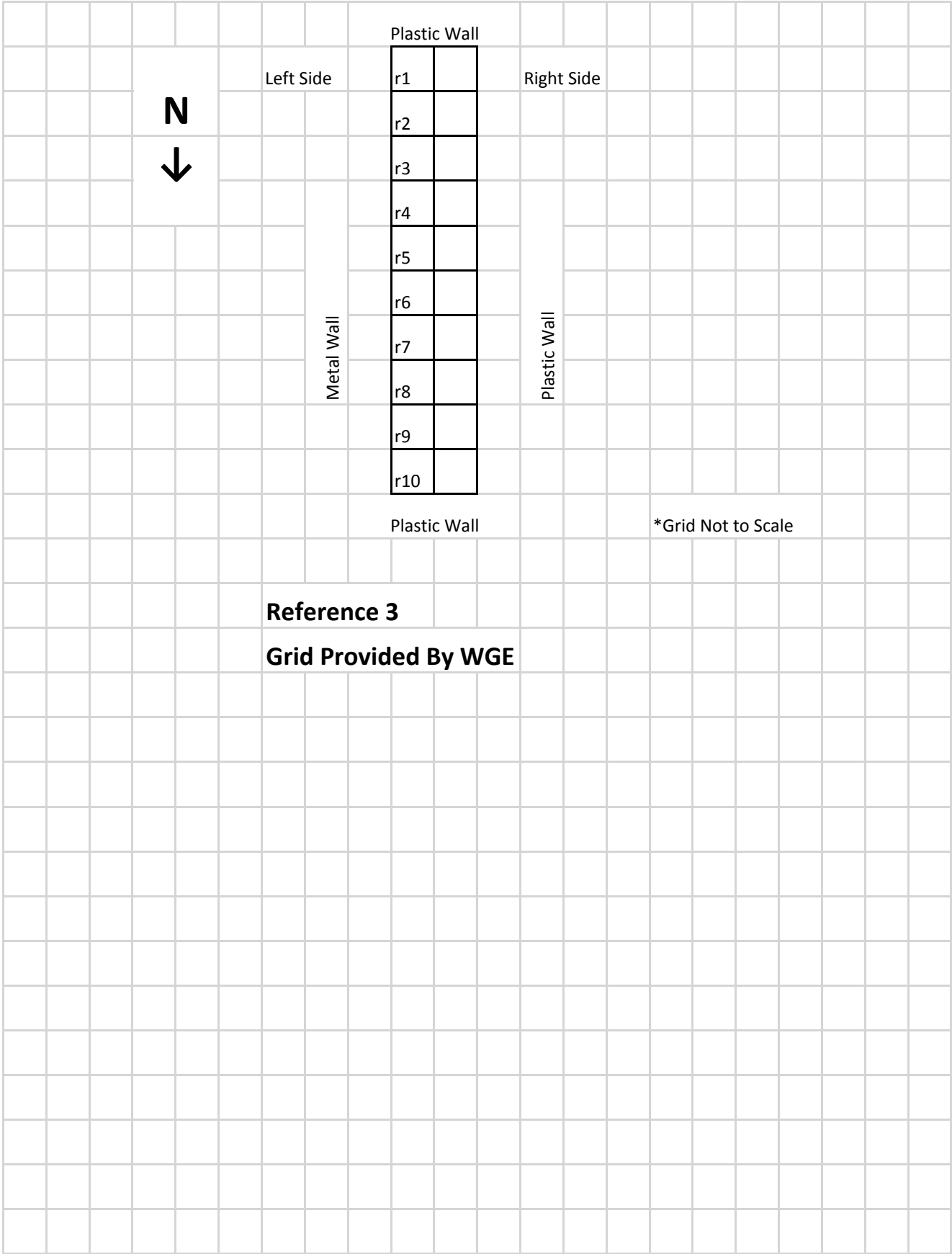
### Reference 3

**Grid Provided By WGE**

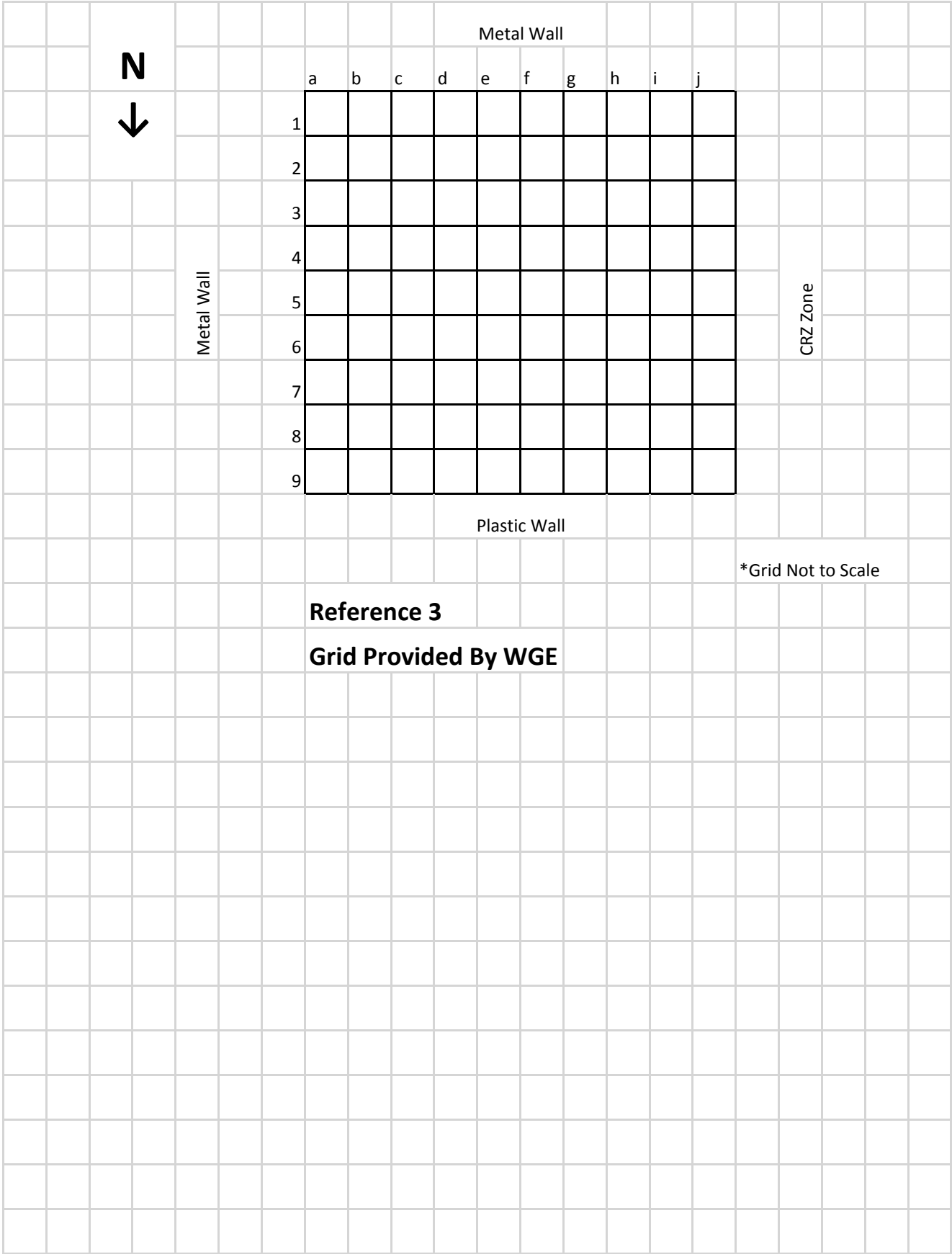
Area B Walls



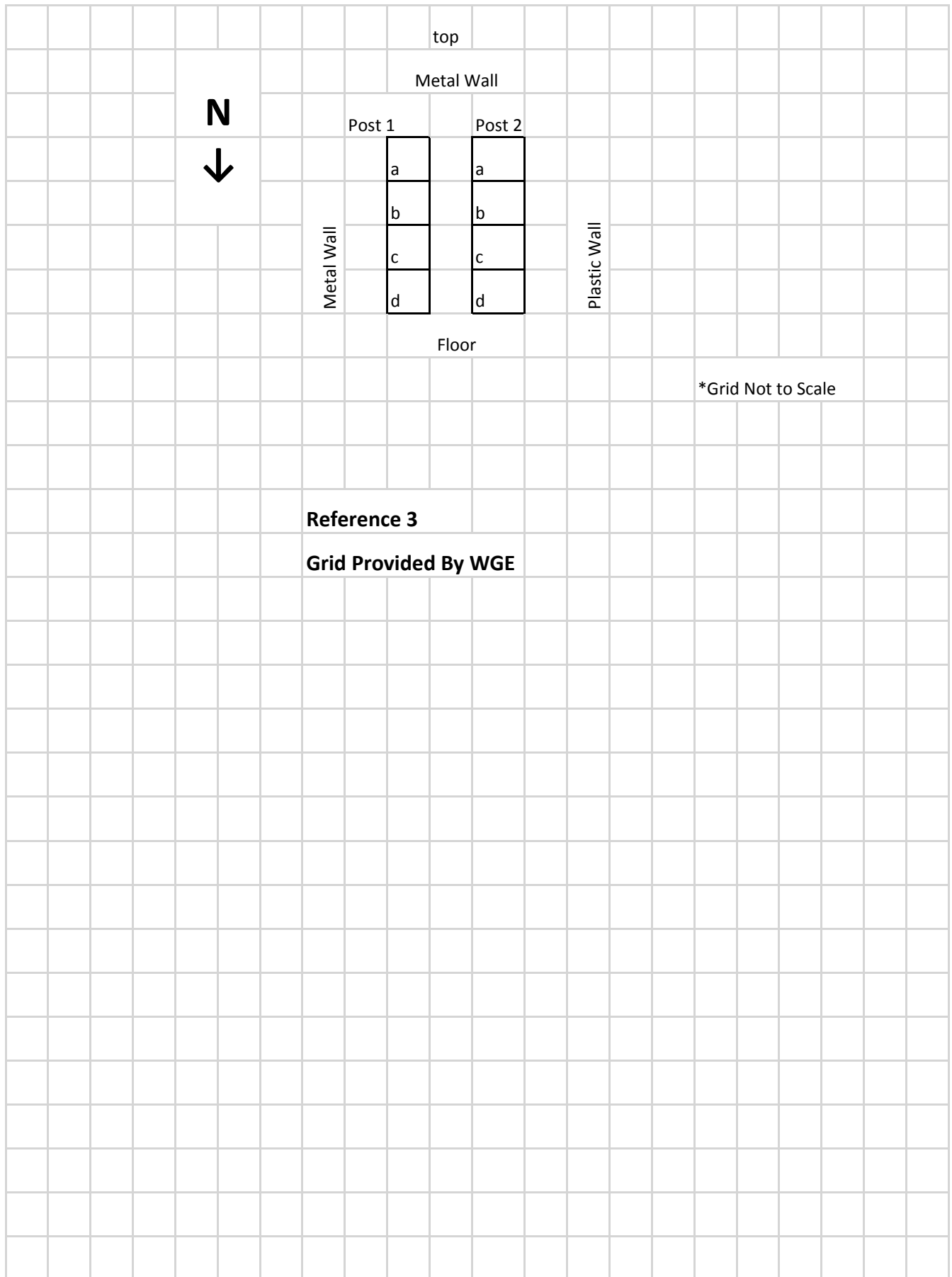
Area B Red Steel



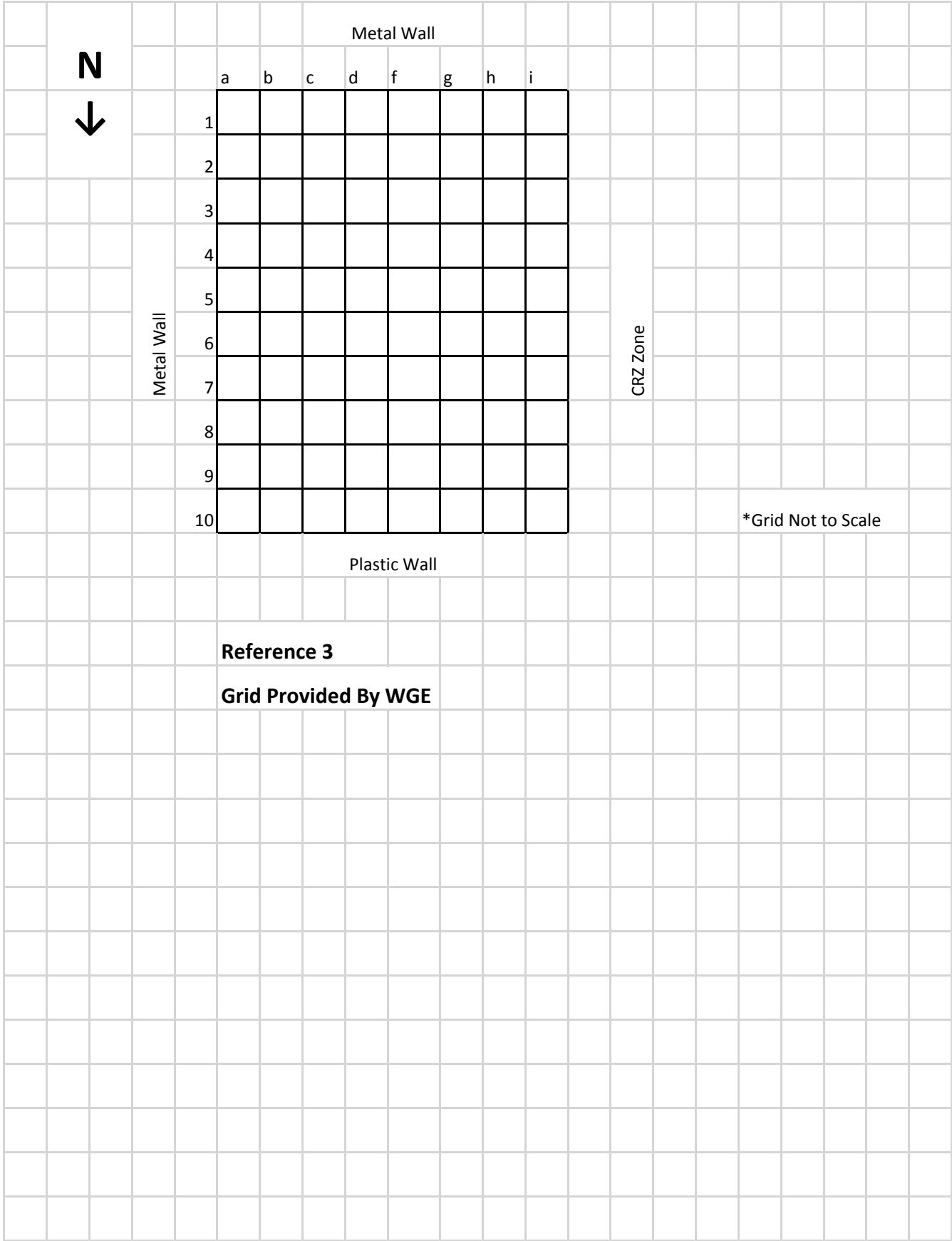
Area B Purlins



Area B Post



Area B Insulation



**APPENDIX D**  
**WGE AIR MONITORING DATA**



# EMSL Analytical, Inc.

<http://www.emsl.com>

3 Cooper St.  
Westmont, NJ 08108  
Phone: (856) 858-4800  
Fax: (856) 858-4571

EMSL

SM

Attn: **Mick Roberts**  
**A.C.T. Services LLC**  
**783 North Clayton Street**  
**Lawrenceville, GA 30046**

3/14/2011

Phone: (770) 682-4343  
Fax: (770) 682-4986

The following analytical report covers the analysis performed on samples submitted to EMSL Analytical, Inc. on 3/10/2011. The results are tabulated on the attached data pages for the following client designated project:

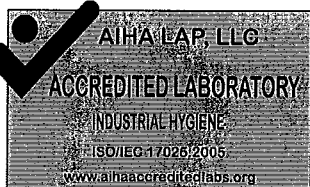
## Palmetto Site - 11.06.001

The reference number for these samples is EMSL Order #011101203. Please use this reference when calling about these samples. If you have any questions, please do not hesitate to contact me at (856) 858-4800.

Reviewed and Approved By:



Julie Smith - Laboratory Director or other approved  
signatory



Accreditation #100194

The samples associated with this report were received in good condition unless otherwise noted. This report relates only to those items tested as received by the laboratory. The QC data associated with the sample results meet the recovery and precision requirements established by the AIHA, unless specifically indicated. The final results are not field blank corrected. The laboratory is not responsible for final results calculated using air volumes that have been provided by non-laboratory personnel. This report may not be reproduced except in full and without written approval by EMSL Analytical, Inc.

**EMSL Analytical, Inc.**

3 Cooper St., Westmont, NJ 08108

Phone: (856) 858-4800 Fax: (856) 858-4571 Email: jsmith@emsl.com



Attn: **Mick Robarts**  
**A.C.T. Services LLC**  
**783 North Clayton Street**  
**Lawrenceville, GA 30046**

Customer ID: ACTS51  
Customer PO:  
Received: 03/10/11 12:00 PM  
EMSL Order: 011101203

Fax: (770) 682-4986 Phone (770) 682-4343

Project: **Palmetto Site - 11.06.001****Analytical Results**

|                                  |                      |                   |          |                |      |
|----------------------------------|----------------------|-------------------|----------|----------------|------|
| <i>Client Sample Description</i> | PS-7<br>Juan Agustin | <i>Collected:</i> | 3/4/2011 | <i>Lab ID:</i> | 0001 |
|----------------------------------|----------------------|-------------------|----------|----------------|------|

| <i>Method</i> | <i>Parameter</i> | <i>Result</i> | <i>Reporting Limit</i> | <i>Units</i> | <i>Analysis Date</i> | <i>Analyst</i> |
|---------------|------------------|---------------|------------------------|--------------|----------------------|----------------|
| 7300 Modified | Lead             | 2.7           | 0.79                   | µg/m³        | 3/10/2011            | iacevedo       |

|                                  |                          |                   |          |                |      |
|----------------------------------|--------------------------|-------------------|----------|----------------|------|
| <i>Client Sample Description</i> | PS-8<br>Work Area Center | <i>Collected:</i> | 3/4/2011 | <i>Lab ID:</i> | 0002 |
|----------------------------------|--------------------------|-------------------|----------|----------------|------|

| <i>Method</i> | <i>Parameter</i> | <i>Result</i> | <i>Reporting Limit</i> | <i>Units</i> | <i>Analysis Date</i> | <i>Analyst</i> |
|---------------|------------------|---------------|------------------------|--------------|----------------------|----------------|
| 7300 Modified | Lead             | ND            | 0.79                   | µg/m³        | 3/10/2011            | iacevedo       |

**Definitions:**

ND - indicates that the analyte was not detected at the reporting limit



TIME : 03-11-'11 12:35  
FAX NO.1 :  
NAME :

```

FILE NO.           : 017
DATE               : 03.11 12:34
TO                 : 817706824986
DOCUMENT PAGES     : 1
START TIME         : 03.11 12:34
END TIME           : 03.11 12:35
PAGES SENT         : 1
STATUS             : OK

```

\*\*\* SUCCESSFUL TX NOTICE

# CHAIN OF CUSTODY FORM FOR AIR SAMPLE ANALYSIS

Project Name: Belaratto Site - 11.06.2001  
 Sampler Name: Marty Miller  
 Sampling Date: 3-4-11

Client Name: A. L. T. Services Contact: Mich Roberts  
Address: 783 W. Clayton St. Phone: 770-682-4343  
Lanternville, Ga. Fax: 770-682-4986  
30046

[illegible]

| Turnaround Time: | <input type="checkbox"/> 3 days max. | Normal (5 days):                                     | <input type="checkbox"/> | <input type="checkbox"/> | Sinnet |
|------------------|--------------------------------------|--|--------------------------|--------------------------|--------|
|                  |                                      | Lead - Please fax copy of C.O.B. to A.C.T. c/w Mick. |                          |                          |        |

 Sinnott

Delivered Direct to Lab:  
Method of Shipment:  
Lab Recipient:  
Date:

Method of Shipment: \_\_\_\_\_  
Lab Recipient: \_\_\_\_\_  
Date: \_\_\_\_\_

24

|                  |             |            |              |
|------------------|-------------|------------|--------------|
| Relinquished By: | Wendy D. Mc | Date/Time: | 3-8-11 6:15p |
| Received By:     | Wendy D. Mc | Date/Time: | 3/8/11 6:15p |
| Relinquished By: |             | Date/Time: |              |
| Received By:     |             | Date/Time: |              |

**COPIES TO**

**MONITORING REPORT  
AIRBORNE LEAD AT  
PALMETTO PARKWAY SITE  
WELCH GROUP ENVIRONMENTAL  
BELTON, SOUTH CAROLINA  
March 29 through June 24, 2011**

EXECUTIVE SUMMARY

Airborne concentrations of lead were below the OSHA action level on 26 of the days sampled, but exceeded the PEL on ten of the days sampled. Informing employees of these results are recommended.

PURPOSE

To determine airborne concentrations of lead during clean-up of lead from this site.

SAMPLING AND ANALYSIS

Battery operated pumps were used to draw air at 2 liters per minute (Lpm) through 0.8 um mixed cellulose ester filters contained in 37 mm plastic cassettes to collect airborne particulate. The samples were sent to Wisconsin Occupational Health Laboratory in Madison, Wisconsin for analysis.

STANDARDS

The Occupational Health and Safety Administration (OSHA) permissible exposure limit (PEL) is a legal limit not to be exceeded for an 8-hour time weighted average (TWA), unless some other time limit or restriction is placed on the PEL. A short term exposure limit (STEL) is usually a 15-minute TWA for materials which exhibit short term effects at concentrations above the 8-hour TWA concentration. A value preceded by a C is a ceiling limit not to be exceeded. OSHA exposures are determined from the airborne concentration without regard to protection provided by respirator use. In agent specific standards OSHA requires adjustments to the PEL for work shifts longer than 8 hours.

The American Conference of Governmental Industrial Hygienists (ACGIH) threshold limit value (TLV) is the original and most widely accepted exposure guideline.

The following table lists these standards and guidelines.

| Material  | PEL |      | TLV |      |
|---|-----|------|-----|------|
|   | TWA | STEL | TWA | STEL |
| The following limits are in mg/m <sup>3</sup> : |     |      |     |      |
| lead  |     | 0.05 |     | 0.05 |

### RESULTS AND DISCUSSION

Concentrations of airborne lead collected during clean-up activities at the Palmetto Parkway Site are shown in tables 1 and 2. Airborne lead ranged from less than 0.0015 mg/m<sup>3</sup> to 0.38 mg/m<sup>3</sup>.

### CONCLUSIONS AND RECOMMENDATIONS

1. Airborne lead concentrations were below the OSHA action level on 26 of the days sampled.
2. Airborne lead concentrations exceeded the PEL on ten (10) of the days sampled.
3. General Recommendation: Share the essence of this report with affected employees.

By: Gerald Beaumont, CIH  
date: 3-30-2012

Table 1

**Airborne Concentrations of Lead during Clean-up of the Palmetto Parkway Site at 110 Palmetto Parkway in Belton, South Carolina on March 29 through May 23, 2011.**

| <u>date</u>    | <u>sample<br/>time</u><br>(min) | <u>concentration of<br/>lead</u><br>(mg/m <sup>3</sup> ) |
|----------------|---------------------------------|--|
| March 29, 2011 | 540                             | 0.058  |
| March 30, 2011 | 240                             | 0.015  |
| March 31, 2011 | 555                             | 0.0043   |
| April 1, 2011  | 510                             | 0.0043   |
| April 4, 2011  | 540                             | 0.013  |
| April 5, 2011  | 540                             | 0.015  |
| April 6, 2011  | 540                             | 0.0082   |
| April 7, 2011  | 540                             | <0.0016*   |
| April 8, 2011  | 540                             | <0.0016  |
| April 11, 2011 | 540                             | <0.0017  |
| April 12, 2011 | 450                             | 0.026  |
| April 14, 2011 | 510                             | 0.056  |
| April 15, 2011 | 240                             | 0.069  |
| April 19, 2011 | 450                             | 0.022  |
| April 20, 2011 | 270                             | 0.0064   |
| April 21, 2011 | 435                             | 0.0075   |
| April 22, 2011 | 420                             | 0.040  |
| April 25, 2011 | 510                             | 0.25   |
| April 26, 2011 | 540                             | 0.023  |
| May 3, 2011    | 110                             | 0.027  |
| May 4, 2011    | 480                             | 0.011  |
| May 5, 2011    | 480                             | 0.028  |
| May 5, 2011    | 535                             | 0.042  |
| May 12, 2011   | 550                             | 0.023  |
| May 13, 2011   | 480                             | <0.0018  |
| May 16, 2011   | 540                             | 0.013  |
| May 17, 2011   | 540                             | 0.050  |
| May 18, 2011   | 600                             | <0.0015  |
| May 23, 2011   | 510                             | 0.086  |
| PEL, 8 hr TWA  |                                 | 0.05   |
| TLV            |                                 | 0.05   |

\* < means that the material was not detected and the value listed is the limit of detection for the sampling and analytical method.

Table 2

**Airborne Concentrations of Lead during Clean-up of the Palmetto Parkway Site at 110 Palmetto Parkway in Belton, South Carolina on May 24 through June 24, 2011.**

| <u>date</u>       | <u>sample<br/>time</u><br>(min) | <u>concentration of<br/>lead</u><br>(mg/m <sup>3</sup> ) |
|-------------------|---------------------------------|--|
| May 24, 2011      | 540                             | 0.024  |
| May 25, 2011      | 540                             | 0.011  |
| May 26, 2011      | 570                             | 0.022  |
| May 27, 2011      | 450                             | 0.024  |
| May 28, 2011      | 570                             | 0.012  |
| June 8, 2011      | 420                             | 0.041  |
| June 10, 2011     | 450                             | 0.38   |
| June 13, 2011     | 450                             | 0.10   |
| June 14, 2011     | 480                             | 0.16   |
| June 15, 2011     | 480                             | 0.0021   |
| June 16, 2011???? | 480                             | 0.080  |
| June 22, 2011     | 510                             | 0.028  |
| June 23, 2011     | 480                             | <0.0018*   |
| June 24, 2011     | 480                             | 0.0042   |
| PEL, 8 hr TWA     |                                 | 0.05   |
| TLV               |                                 | 0.05   |

??? this date was not entered on the sampling cassette, but the duration of the sample and the ink used on the cassette suggest that it was collected on this date.

\* < means that the material was not detected and the value listed is the limit of detection for the sampling and analytical method.



**APPENDIX E**  
**WGE DISPOSAL DOCUMENTATION**

FREIGHT CHARGES ARE PREPAID ON THIS BILL OF LADING UNLESS MARKED COLLECT

CARRIER: **HEPACO**  
 EPA DO#  
 NCO. 986194305

**OLD DOMINION FREIGHT LINE, INC.**  
 PHONE: 800-432-6333 WEB: www.odfl.com  
**INTERNET STRAIGHT BILL OF LADING**  
 ORIGINAL - NOT NEGOTIABLE

**THANK YOU FOR CHOOSING  
 OLD DOMINION FREIGHT LINE  
 PLACE PRO LABEL HERE**

FREIGHT CHARGES:  
 Collect

DATE:

B/L# -

PO#:

SHIPPER (FROM):

WELCH GROUP ENVIRONMENTAL  
 115 WHITE OAK ROAD  
 BELTON SC 29627

CONSIGNEE (TO):

WELCH GROUP ENVIRONMENTAL  
 5034 BELTON HIGHWAY  
 ANDERSON SC 29621

COD

Amount:

COD Fee:

Subject to section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

BILL THIRD PARTY FREIGHT CHARGES TO:

REMIT TO (COD):

| Pieces | HM                                  | Description                           | Type | NMFC No. | Class | Weight (lbs) |
|--------|-------------------------------------|---------------------------------------|------|----------|-------|--------------|
| 28     | <input checked="" type="checkbox"/> | 55 GALLON DRUMS PPE LEAD CONTAMINATED |      |          | 9     |              |
| 4      | <input checked="" type="checkbox"/> | LEAD CONTAMINATED MATTRESSES          |      |          | 9     |              |
| 1      | <input type="checkbox"/>            | *****RATE QUOTE***** 699              |      |          | 9     |              |
| 2      | <input checked="" type="checkbox"/> | PALLETS MISC LEAD CONTAMINATED DEBRIS |      |          | 9     |              |
| 1      | <input checked="" type="checkbox"/> | POLY TOTE LEAD CONTAMINATED           |      |          | 9     |              |
|        | <input type="checkbox"/>            |                                       |      |          |       |              |
|        | <input type="checkbox"/>            |                                       |      |          |       |              |
|        | <input type="checkbox"/>            |                                       |      |          |       |              |
|        | <input type="checkbox"/>            |                                       |      |          |       |              |
|        | <input type="checkbox"/>            |                                       |      |          |       |              |

SPECIAL INSTRUCTIONS

RATE REFERENCE#

HAZARDOUS MATERIALS EMERGENCY CONTACT:

SCOTT SHAW 864-462-0405

FREEZABLE - NO

Total Weight: 0

Total Shipping Units: 0

Carrier Liability: Shipments valued at more than \$25.00 per pound are of extraordinary value. Carrier's maximum liability is \$25.00 per pound per package subject to \$100,000.00 maximum total liability per shipment. The agreed value on household goods, used machinery, or personal effects does not exceed ten cents per pound per article, unless otherwise specified.

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

\$ \_\_\_\_\_ per \_\_\_\_\_

Shipper hereby certifies that he understands that all transportation by ODFL shall be subject to the terms and conditions of the Bill of Lading contract shown in the NMFC 100 series, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE NATIONAL MOTOR FREIGHT CLASSIFICATION AS SHOWN IN THE NMFC 100 SERIES.

ACCESSORIAL SERVICES REQUESTED

☐ ARN ☐ CA ☐ HYD ☐ IDC ☐ RDC ☐ IND ☐ OVL ☐ OV2 ☐ EXD

Ins. Amount

Note: Items excluded from coverage include used articles, household goods, personal effects, and other prohibited commodities shown in OD Rules 100, Item 780. Maximum liability shall not exceed \$250,000.00 and shipments must be prepaid. See OD Rules 100, Item 574 for complete rules on Insurance - truck conveyed freight.

SHIPPER  
Welch Group Glen WelchDATE  
10/25/11

H/L RECEIVED

TRAILER NO.  
461963

AUTHORIZED SIGNATURE (Shipper)

CARRIER  
OLD DOMINION FREIGHT LINE, INC. HEPACO



CARRIER

HEPACO  
PAID  
NCD 986194306

FREIGHT CHARGES ARE PREPAID ON THIS BILL OF LADING UNLESS MARKED COLLECT

**OLD DOMINION FREIGHT LINE, INC.**

PHONE: 800-432-6335

WEB: WWW.ODFL.COM

**INTERNET STRAIGHT BILL OF LADING**

ORIGINAL - NOT NEGOTIABLE

**THANK YOU FOR CHOOSING  
OLD DOMINION FREIGHT LINE  
PLACE PRO LABEL HERE**

FREIGHT CHARGES:

Collect

DATE:

10-25-2011

B/L# -

PO#:

SHIPPER (FROM):

WELCH GROUP ENVIRONMENTAL  
118 WHITE OAK ROAD  
BELTON SC 29627

CONSIGNEE (TO):

WELCH GROUP ENVIRONMENTAL  
3034 BELTON  
ANDERSON SC 29261

COD

Amount:

COD Fee:

Subject to section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

BILL THIRD PARTY FREIGHT CHARGES TO:

REMIT TO (COD):

(Signature of Consignor)

| Pieces | HM                                  | Description                    | Type | NMFC No. | Class | Weight (lbs) |
|--------|-------------------------------------|--------------------------------|------|----------|-------|--------------|
| 11     | <input checked="" type="checkbox"/> | LEAD CONTAMINATED MISC. DEBRIS | PAL  |          | 9     |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |
|        | <input type="checkbox"/>            | *****RATE QUOTE***** 699       |      |          |       |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |
|        | <input type="checkbox"/>            |                                |      |          |       |              |

SPECIAL INSTRUCTIONS

RATE REFERENCE#

HAZARDOUS MATERIALS EMERGENCY CONTACT:

SCOTT SHAW 864-462-0405

FREEZABLE - NO

Total Weight: 0

Total Shipping Units: 0

Carrier Liability: Shipments valued at more than \$25.00 per pound are of extraordinary value. Carrier's maximum liability is \$25.00 per pound per package subject to \$100,000.00 maximum total liability per shipment. The agreed value on household goods, used machinery, or personal effects does not exceed ten cents per pound per article, unless otherwise specified.

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

\$ \_\_\_\_\_ per \_\_\_\_\_

Shipper hereby certifies that he understands that all transportation by ODFL shall be subject to the terms and conditions of the Bill of Lading contracts shown in the NMFC 100 Series, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE NATIONAL MOTOR FREIGHT CLASSIFICATION AS SHOWN IN THE NMFC 100 SERIES.

## ACCESSORIAL SERVICES REQUESTED

☐ ARN ☐ CA ☐ HYD ☐ IDC ☐ RDC ☐ IND ☐ OVL ☐ OV2 ☐ EXD

(Ins. Amount)

Note: Items excluded from coverage include used articles, household goods, personal effects, and other prohibited commodities shown in OD Rules 100, Item 780. Maximum liability shall not exceed \$250,000.00 and shipments must be prepaid. See OD Rules 100, Item 574 for complete rules on insurance - truck conveyed freight.

SHIPPER  
Welch Group Glen WelchDATE  
10/25/11

HAI RECEIVED

TRAILER NO.  
461963

AUTHORIZED SIGNATURE (Shipper)

CARRIER  
OLD DOMINION FREIGHT LINE, INC. HEPACO



CARRIER: HEPACO  
ETA TO NED 986194306

FREIGHT CHARGES ARE PREPAID ON THIS BILL OF LADING UNLESS MARKED COLLECT

**OLD DOMINION FREIGHT LINE, INC**  
PHONE: 800-432-6335 WEB: www.odfl.com  
**INTERNET STRAIGHT BILL OF LADING**  
ORIGINAL - NOT NEGOTIABLE

**THANK YOU FOR CHOOSING  
OLD DOMINION FREIGHT LINE  
PLACE PRO LABEL HERE**

FREIGHT CHARGES:  
Collect

DATE:

B/L# -

PO#:

SHIPPER (FROM):

WELCH GROUP ENVIRONMENTAL  
118 WHITE OAK ROAD  
BELTON SC 29667

CONSIGNEE (TO):

WELCH GROUP ENVIRONMENTAL  
5034 BELTON HIGHWAY  
ANDERSON SC 29621

COD

Amount:

COD Fee:

Subject to section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

BILL THIRD PARTY FREIGHT CHARGES TO:

REMIT TO (COD):

(Signature of Consignor)

| Pieces | HM                       | Description                                  | Type | NMFC No. | Class | Weight (lbs) |
|--------|--------------------------|--|------|----------|-------|--------------|
| 9      | <input type="checkbox"/> | LEAD CONTAMINATED MISC DEBRIS                | PAL  |          | 9     |              |
| 3      | <input type="checkbox"/> | LEAD CONTAMINATED WATER VINEGAR MIX          | DRUM |          | 9     |              |
|        | <input type="checkbox"/> | *****RATE QUOTE***** 699                     |      |          |       |              |
| 1      | <input type="checkbox"/> | LEAD CONTAMINATED PPE (TYVEK, GLOVES, BOOTS) | DRUM |          | 9     |              |
|        | <input type="checkbox"/> | LEAD CONTAMINATED GARAGE DOOR PARTS          | EA   |          | 9     |              |
| 1      | <input type="checkbox"/> | LEAD CONTAMINATED MATTRESS                   | EA   |          | 9     |              |
|        | <input type="checkbox"/> |  |      |          |       |              |
|        | <input type="checkbox"/> |  |      |          |       |              |
|        | <input type="checkbox"/> |  |      |          |       |              |
|        | <input type="checkbox"/> |  |      |          |       |              |

SPECIAL INSTRUCTIONS

RATE REFERENCE#

HAZARDOUS MATERIALS EMERGENCY CONTACT:

SCOTT SHAW 864-462-0405

FREEZABLE - NO

Total Weight: 0

Total Shipping Units: 0

Carrier Liability: Shipments valued at more than \$25.00 per pound are of extraordinary value. Carrier's maximum liability is \$25.00 per pound per package subject to \$100,000.00 maximum total liability per shipment. The agreed value on household goods, used machinery, or personal effects does not exceed ten cents per pound per article, unless otherwise specified.

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

\$ \_\_\_\_\_ per \_\_\_\_\_

Shipper hereby certifies that he understands that all transportation by ODFL shall be subject to the terms and conditions of the Bill of Lading contract shown in the NMFC 100 series, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE NATIONAL MOTOR FREIGHT CLASSIFICATION AS SHOWN IN THE NMFC 100 SERIES.

ACCESSORIAL SERVICES REQUESTED

☐ ARN ☐ CA ☐ HYD ☐ IDC ☐ RDC ☐ IND ☐ OVL ☐ OV2 ☐ EXD

Ins. Amount

Note: Items excluded from coverage include used articles, household goods, personal effects, and other prohibited commodities shown in OD Rules 100, Item 769. Maximum liability shall not exceed \$250,000.00 and shipments must be prepaid. See OD Rules 100, Item 574 for complete rules on insurance - truck conveyed freight.

SHIPPER  
Welch Group Glen Welch

AUTHORIZED SIGNATURE (Shipper)

DATE  
10-25-11

HAJ RECEIVED

TRAILER #  
461963

CARRIER  
OLD DOMINION FREIGHT LINE, INC. HE PACCO

AUTHORIZED SIGNATURE (Carrier)

**APPENDIX F**  
**EPA SITE RELATED DOCUMENTS AND POLLUTION SITUATION REPORTS**

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 POLLUTION/SITUATION REPORT  
 Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep  
 Initial Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 Region IV**

**Subject:** **POLREP #1**  
**Initial Emergency Response PRP Lead w EPA Oversight**  
**Welch Group Environmental (WGE) Palmetto Hwy**  
**B4F6**  
**Belton, SC**  
**Latitude: 34.5228881 Longitude: -82.4942948**

**To:**  
**From:** Leo Francendese, OSC  
**Date:** 2/14/2011  
**Reporting Period:** 2/07/2011 thru 2/14/2011

## 1. Introduction

### 1.1 Background

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

#### 1.1.1 Incident Category

PRP Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse

owner and WGE's operator, the OSC conducted a walkthru on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger of public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fairplay and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties is expected to be complete by the end of February. Further recommendations will be made at that time.

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fairplay and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

The PRPs have been directed by the OSC to submit workplans for securing the facility, remediating the surfaces and providing a Health and Safety Plan.

The HASP has been submitted <http://www.epaosc.org/sites/6682/files/WGE%20H&S%20PALMETTO%20Site%20Rev.pdf> and approved as of February 14th. <http://www.epaosc.org/sites/6682/files/WP%20and%20HnS%20Approval%20Memo.pdf> In addition, the Removal Action Workplan (RAWP) was also submitted <http://www.epaosc.org/sites/6682/files/WelchGroup%20PalmettoHwy%20SOW%2002132011.pdf> and approved on February 14th.

The PRP and property owner have notified other users of the warehouse to stay out of the contaminated section of the warehouse and to use the alternate docking bay for operations until those areas have been remediated.

#### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

Access <http://www.epaosc.org/sites/6682/files/EPA%20form%20for%20Cummings%20Gary0001.pdf> has been secured and NOFI <http://www.epaosc.org/sites/6682/files/NOFI%20Final%20signed%20EPA%20form%20for%20Cummings%20Gary0001.pdf> CERCLA Cost Recovery and Legal support have been initiated. The EPA attorney will conduct an introductory conference call with the counsel for the PRPs on February 25th at 1000.

### **2.2 Planning Section**

#### **2.2.1.1 Planned Response Activities**

The PRP will conduct further securing of the site commencing on February 15th. Actual warehouse decontamination will likely commence the week of February 21st.

#### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

#### **2.3 Logistics Section**

No information available at this time.

#### **2.4 Finance Section**

No information available at this time.

#### **2.5 Other Command Staff**

No information available at this time.

### **3. Participating Entities**

No information available at this time.

### **4. Personnel On Site**

1 EPA  
2 START

### **5. Definition of Terms**

No information available at this time.

### **6. Additional sources of information**

No information available at this time.

### **7. Situational Reference Materials**

No information available at this time.



U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV**

**Subject:** **POLREP #2**  
**Continued PRP Lead Emergency Response w EPA Oversight**  
**Welch Group Environmental (WGE) Palmetto Hwy**  
**B4F6**  
**Belton, SC**  
**Latitude: 34.5228881 Longitude: -82.4942948**

**To:**  
**From:** Leo Francendese, OSC  
**Date:** 2/20/2011  
**Reporting Period:** 2/14/11 through 2/21/11

## 1. Introduction

### 1.1 Background

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

#### 1.1.1 Incident Category

PRP Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a walkthrough on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35000 ppm on the floors and walls of the area where WGE stored property. WGE has indicated that the property will be remediated to the EPA Regional Screening Level of 400ppm.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties is expected to be complete by the end of February. Further recommendations will be made at that time.

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

The PRPs have been directed by the OSC to submit workplans for securing the facility and remediating the surfaces. The HASP has been submitted <http://www.epaosc.org/sites/6682/files/WGE%20H&S%20PALMETTO%20Site%20Rev.pdf> and approved as of February 14th. <http://www.epaosc.org/sites/6682/files/WP%20and%20HnS%20Approval%20Memo.pdf>. In addition, the Removal Action Workplan (RAWP) was also submitted <http://www.epaosc.org/sites/6682/files/WelchGroup%20PalmettoHwy%20SOW%2002132011.pdf> and approved on February 14th.

The following operational actions have been completed:

1. The area where the range recovered material were stored was barricaded to restrict access to that part of the warehouse.
2. Paper Floor covering was placed in designated areas along barricade paths and secured with duct tape until remediation activities could occur.

Contractor Daily Progress Reports (DPRs) can be found in the documents section. Here is a link for the 16th: <http://epaosc.org/sites/6682/files/WGE%20BeltonPALMETTO%20Progress%20Notes2162011.pdf>.

The PRP and property owner have notified other users of the warehouse to stay out of the contaminated section of the warehouse and to use the alternate docking bay for operations until those areas have been remediated.

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper floor covering and barricades for integrity purposes.

#### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

Access <http://www.epaossc.org/sites/6682/files/EPA%20form%20for%20Cummings%20Gary0001.pdf> has been secured and NOFI <http://www.epaossc.org/sites/6682/files/NOFI%20Final%20signed%20EPA%20form%20for%20Cummings%20Gary0001.pdf> CERCLA Cost Recovery and Legal support have been initiated. The EPA attorney conducted an introductory conference call with the counsel for the PRPs on February 15, 2011.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

The PRP will conduct several pilot tests commencing on February 21th to determine if decontamination methods are successful. After cleaning the test areas START will XRF the locations to determine its effectiveness.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

## **2.3 Logistics Section**

No information available at this time.

## **2.4 Finance Section**

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

No information available at this time.

## **4. Personnel On Site**

1 EPA  
2 START

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV**

**Subject:** POLREP #3  
Remediation Progress  
Welch Group Environmental (WGE) Palmetto Hwy  
B4F6  
Belton, SC  
Latitude: 34.5228881 Longitude: -82.4942948

**To:**

**From:** Leo Francendese, OSC

**Date:** 2/28/2011

**Reporting Period:** 2/21/11 through 2/28/11

## 1. Introduction

### 1.1 Background

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

#### 1.1.1 Incident Category

PRP Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a walkthrough on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties is expected to be complete by the end of February. Further recommendations will be made at that time.

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

WGE has submitted requested changes in RAWP, including change in contractor. Memo can be found here: [http://www.epaosc.org/site/doc\\_list.aspx?site\\_id=6682&RadUrid=e2f3ef11-652a-4562-a20b-e0d67d60e698](http://www.epaosc.org/site/doc_list.aspx?site_id=6682&RadUrid=e2f3ef11-652a-4562-a20b-e0d67d60e698)

The following operational actions have been completed:

1. The area where the range recovered material was stored was barricaded to restrict access to that part of the warehouse.
2. Paper Floor covering was placed in designated areas along barricaded paths and secured with duct tape until remediation activities occurred.
3. Remediation activities began on 2-28-2011. The barricaded path was decontaminated by scrubbing the flooring with half a cup of Trisodium phosphate, both solid and liquid of the product, per gallon of water using wire brushes. GilAir sampling pumps were utilized during the decontamination process for samples to later be submitted to AES laboratory in Atlanta, Georgia to determine ambient lead concentrations present in the work zone.
4. Once the barricaded area received an initial decontamination, START conducted preliminary lead screenings utilizing an XRF to determine if the initial decontamination was successful. Preliminary screening showed that some areas of the barricaded flooring were below the 400 ppm screening level, however other locations had screening levels just above 400 ppm.
6. The barricaded area received a second decontamination and once the flooring completely dried, lead screening was conducted by the PRP's contractor. The area was divided into 2 x 2 grids and labeled using a letter-number system for screening purposes. This round of screening showed lead results ranging from approximately 200 ppm up to 1,200 ppm.
7. During the decontamination process, the PRP's clean up contractor generated 15 gallons of waste water, which was stored in a 55 gallon sealed drum on the premises, and expended 10 mop heads.
8. The barricaded area was covered with plastic to ensure there would be no cross-contamination once all personnel left the site. Decontamination and screening procedures will continue again tomorrow, 3-1-11.

Contractor Daily Progress Reports (DPRs) can be found in the documents section. Here is a link for the 28th: [http://www.epaosc.org/sites/6682/files/DPR\\_for\\_EPA\\_at\\_Palmetto\\_location\[1\].docx](http://www.epaosc.org/sites/6682/files/DPR_for_EPA_at_Palmetto_location[1].docx)

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted oversight of the decontamination process and conducted confirmation screening of the PRP's contractor data during the screening of the barricaded area.

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

Access <http://www.epaosc.org/sites/6682/files/EPA%20form%20for%20Cummings%20Gary0001.pdf> has been secured and NOFI <http://www.epaosc.org/sites/6682/files/NOFI%20Final%20signed%20EPA%20form%20for%20Cummings%20Gary0001.pdf> CERCLA Cost Recovery and Legal support have been initiated.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

PRP will submit additional workplan and schedule for remainder of the affected warehouse as part of the upcoming time critical removal action Administrative Order on Consent.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

## **2.3 Logistics Section**

No information available at this time.

## **2.4 Finance Section**

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

No information available at this time.

## **4. Personnel On Site**

- 1 EPA
- 1 START

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV**

**Subject:** POLREP #4  
Remediation Progress  
Welch Group Environmental (WGE) Palmetto Hwy  
B4F6  
Belton, SC  
Latitude: 34.5228881 Longitude: -82.4942948

**To:**  
**From:** Leo Francendese, OSC  
**Date:** 3/21/2011  
**Reporting Period:** 2/28 through 3/21

## 1. Introduction

### 1.1 Background

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

#### 1.1.1 Incident Category

PRP Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a site walk on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35,000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties is expected to be complete by the end of February. Further recommendations will be made at that time.

Currently the OSC is waiting to receive the RAWP from the PRP. Once the RAWP has been approved, remediation and removal efforts can continue at the site. Due to the impending RAWP, there was no work conducted at the site for the week of 3/6/2011. The week of 3/6/2011, the PRP had WGE employees HAZWOPER trained in an effort to reduce PRP cost of hiring a contractor.

The PRP amendment to continue remediation efforts was approved on March 19, 2011 ([Approved Workplan Amendments](#)).

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

WGE has submitted requested change in contractor. Memo can be found here: [Contractor Change Document](#)

From February 28 to March 1, 2011, restricted areas were barricaded in the warehouse. Floors in these areas were covered with paper flooring to prevent dust migration. These restricted areas were decontaminated for lead using Trisodium phosphate (1/2 cup per 1-gallon of water). The floors were scrubbed using wire brushes. XRF screenings were conducted after each area was scrubbed.

At the north end of the warehouse, a sealant prevented decontamination on the flooring. Grinding away two thick layers of concrete were necessary to sufficiently decontaminate the area. Additional barricades were constructed to prevent spreading dust generated during grinding. Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

During decontamination, ambient air monitoring was performed with GilAir sampling pumps. Filters are being analyzed for lead. In addition, waste waters generated during decontamination are stored in 55-gallon drums and labeled appropriately for future disposal.

XRF screening levels for lead below 400 ppm are considered decontaminated. START and PRP contractors conducted XRF screenings. After completing decontamination, cleaned areas were sealed with poly to prevent future contamination.



Contractor Daily Progress Reports (DPRs) can be found in the documents section. Here is a link for March 4, 2011: [DPR 3-4-11](#)

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted oversight of the decontamination process and conducted confirmation screening of the PRP's contractor data during the screening of the barricaded area.

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

An [Access Agreement](#) has been secured and [NOFI](#) CERCLA Cost Recovery and Legal support have been initiated.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

PRP submitted additional work plan and [Schedule Revision](#) for remainder of the affected warehouse as part of the upcoming time critical removal action Administrative Order on Consent.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

## **2.3 Logistics Section**

No information available at this time.

## **2.4 Finance Section**

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

No information available at this time.

## **4. Personnel On Site**

- 1 EPA
- 1 START

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV**

**Subject:** POLREP #5  
Remediation Progress  
Welch Group Environmental (WGE) Palmetto Hwy  
B4F6  
Belton, SC  
Latitude: 34.5228881 Longitude: -82.4942948

**To:**

**From:** Leo Francendese, OSC

**Date:** 4/11/2011

**Reporting Period:** 3/21 through 4/11

## 1. Introduction

### 1.1 Background

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

#### 1.1.1 Incident Category

PRP Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a site walk on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35,000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties is expected to be complete by the end of February. Further recommendations will be made at that time.

Currently the OSC is waiting to receive the RAWP from the PRP. Once the RAWP has been approved, remediation and removal efforts can continue at the site. Due to the impending RAWP, there was no work conducted at the site for the week of 3/6/2011. The week of 3/6/2011, the PRP had WGE employees HAZWOPER trained in an effort to reduce PRP cost of hiring a contractor.

The PRP amendment to continue remediation efforts was approved on March 19, 2011 ([Approved Workplan Amendments](#)).

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

WGE has submitted requested change in contractor. Memo can be found here: [Contractor Change Document](#)

From February 28 to March 1, 2011, restricted areas were barricaded in the warehouse. Floors in these areas were covered with paper flooring to prevent dust migration. These restricted areas were decontaminated for lead using Trisodium phosphate (1/2 cup per 1-gallon of water). The floors were scrubbed using wire brushes. XRF screenings were conducted after each area was scrubbed.

At the north end of the warehouse, a sealant prevented decontamination on the flooring. Grinding away two layers of concrete were necessary to sufficiently decontaminate the area. Additional barricades were constructed to prevent spreading dust generated during grinding. Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

During decontamination, ambient air monitoring was performed with GilAir sampling pumps. Filters are being analyzed for lead. In addition, waste waters generated during decontamination are stored in 55-gallon drums and labeled appropriately for future disposal.

XRF screening levels for lead below 400 ppm are considered decontaminated. START and PRP contractors conducted XRF screenings. After completing decontamination, cleaned areas were sealed with poly to prevent future contamination.

On March 28, 2011, WGE began decontamination of the area between the restroom and the shared pathway designated Area A ([Warehouse Decontamination Map](#)). Built containment to contain dust, water and conduct air monitoring activities.

Started decontamination of area between bathroom and shared pathway, washed with vinegar, and scrubbed with wire brush, vacuumed all water and contained in a 55 gallon drum with lead hazard stickers. A tanvasco grinder was used on the floor, all dust vacuumed and contained in a contractor bag with lead hazard stickers, and placed into a 55 gallon drum. The floor was washed with vinegar to complete decontamination procedures.

Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

On March 31, 2011 through April 1, 2011, WGE marked 2 ft by 2 ft grids and conducted XRF readings. START collected confirmation XRF readings. Any readings above 400 ppm were additionally decontaminated and re-screened. All areas in Area A were decontaminated to below 400 ppm ([Warehouse Decontamination Map](#)).

On April 4, 2011, WGE began decontamination of designated Area B ([Warehouse Decontamination Map](#)). WGE began decontamination of the walls, steel beams and ceiling. START collected confirmation XRF readings. Readings were above 400 ppm. As such START conducted wipe sampling at several locations. The locations were below 400 ppm. Contractor Daily Progress Reports (DPRs) can be found in the documents section. Here is a link for April 1, 2011: [DPR 4-8-11](#). WGE will continue with decontamination activities.

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted oversight of the decontamination process and conducted confirmation screening of the PRP's contractor data during the screening of the floor path area (loading docks and walk paths).
3. START conducted oversight of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area A ([Warehouse Decontamination Map](#)).

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

An [Access Agreement](#) has been secured and [NOFI](#) CERCLA Cost Recovery and Legal support have been initiated.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

PRP submitted additional work plan and [Schedule Revision](#) for remainder of the affected warehouse as part of the upcoming time critical removal action Administrative Order on Consent.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

## **2.3 Logistics Section**

No information available at this time.

## **2.4 Finance Section**

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

**3. Participating Entities**

No information available at this time.

**4. Personnel On Site**

1 EPA

1 START

**5. Definition of Terms**

No information available at this time.

**6. Additional sources of information**

No information available at this time.

**7. Situational Reference Materials**

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV**

**Subject:** POLREP #6  
Remediation Progress  
Welch Group Environmental (WGE) Palmetto Hwy  
B4F6  
Belton, SC  
Latitude: 34.5228881 Longitude: -82.4942948

**To:**

**From:** Leo Francendese, OSC

**Date:** 4/25/2011

**Reporting Period:** 4/11 through 4/25

## 1. Introduction

### 1.1 Background

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

#### 1.1.1 Incident Category

PRP Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a site walk on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35,000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties was completed in early March 2011. Recommendations to continue decontamination of the affected warehouse interior were documented.

Currently, the OSC is approving 'in the field' work to decontaminate the affected interior of the warehouse while the AOC for the time critical action is being negotiated. The PRP removal action workplan (RAWP) amendments to continue remediation efforts was approved on March 19, 2011 ([Approved Workplan Amendments](#)). Progress of the work can be tracked via daily progress reports (DPRs)

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

WGE has submitted requested change in contractor. Memo can be found here: [Contractor Change Document](#)

From February 28 to March 1, 2011, restricted areas were barricaded in the warehouse. Floors in these areas were covered with paper flooring to prevent dust migration. These restricted areas were decontaminated for lead using Trisodium phosphate (1/2 cup per 1-gallon of water). The floors were scrubbed using wire brushes. XRF screenings were conducted after each area was scrubbed.

At the north end of the warehouse, a sealant prevented decontamination on the flooring. Grinding away two layers of concrete were necessary to sufficiently decontaminate the area. Additional barricades were constructed to prevent spreading dust generated during grinding. Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

During decontamination, ambient air monitoring was performed with GilAir sampling pumps. Filters are being analyzed for lead. In addition, waste waters generated during decontamination are stored in 55-gallon drums and labeled appropriately for future disposal.

XRF screening levels for lead below 400 ppm are considered decontaminated. START and PRP contractors conducted XRF screenings. After completing decontamination, cleaned areas were sealed with poly to prevent future contamination.

On March 28, 2011, WGE began decontamination of the area between the restroom and the shared pathway designated Area A ([Warehouse Decontamination Map](#)). Built containment to contain dust, water and conduct air monitoring activities.

Started decontamination of area between bathroom and shared pathway, washed with vinegar, and scrubbed with wire brush, vacuumed all water and contained in a 55 gallon drum with lead hazard stickers. A tanvasco grinder was used on the floor, all dust vacuumed and contained in a contractor bag with lead hazard stickers, and placed into a 55 gallon drum. The floor was washed with vinegar to complete decontamination procedures.

Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

On March 31, 2011 through April 1, 2011, WGE marked 2 ft by 2 ft grids and conducted XRF readings. START collected confirmation XRF readings. Any readings above 400 ppm were additionally decontaminated and re-screened. All areas in Area A were decontaminated to below 400 ppm ([Warehouse Decontamination Map](#)).

On April 4, 2011 through April 11 2011, WGE began decontamination of designated Area B ([Warehouse Decontamination Map](#)). WGE began decontamination of the walls, steel beams, insulation and ceiling. START collected confirmation XRF readings. Readings were above 400 ppm. As such START conducted wipe sampling at several locations. The locations were below 400 ppm.

April 12, 2011 through April 25, 2011, WGE continued with decontamination of Area B. WGE has completed cleaning the ceiling, walls and side insulation panels (between the top of the building walls and below the roof line). START conducted wipe sampling at several locations along the insulation panels. The wipe samples were screened using the XRF. Readings were below 400 ppm. Contractor Daily Progress Reports (DPRs) can be found in the documents section. Here is a link for April 20, 2011: [DPR 4-20-11](#). WGE will continue with decontamination activities.

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data during the screening of the floor path area (loading docks and walk paths).
3. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area A ([Warehouse Decontamination Map](#)).

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

An [Access Agreement](#) has been secured and [NOFI](#) CERCLA Cost Recovery and Legal support have been initiated. PRPs have been identified. Notice letters and an initial AOC have been submitted for negotiations while the work continues under OSC oversight.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

PRP submitted additional work plan and [Schedule Revision](#) for remainder of the affected warehouse. Work continues as the AOC is undergoing negotiations.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

## **2.3 Logistics Section**

No information available at this time.



#### **2.4 Finance Section**

No information available at this time.

#### **2.5 Other Command Staff**

No information available at this time.

### **3. Participating Entities**

No information available at this time.

### **4. Personnel On Site**

1 START

### **5. Definition of Terms**

No information available at this time.

### **6. Additional sources of information**

No information available at this time.

### **7. Situational Reference Materials**

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 POLLUTION/SITUATION REPORT  
 Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 Region IV**

**Subject:** POLREP #7  
 Remediation Progress and Transmittal of AOC  
 Welch Group Environmental (WGE) Palmetto Hwy  
 B4F6  
 Belton, SC  
 Latitude: 34.5228881 Longitude: -82.4942948

**To:**

**From:** Leo Francendese, OSC

**Date:** 5/20/2011

**Reporting Period:** 4/25 through 5/20

## 1. Introduction

### 1.1 Background

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

#### 1.1.1 Incident Category

PRP Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a mutli-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a site walk on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35,000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties was completed in early March 2011. Recommendations to continue decontamination of the affected warehouse interior were documented.

The PRP removal action workplan (RAWP) amendments to continue remediation efforts was approved on March 19, 2011 ([Approved Workplan Amendments](#)). Progress of the work can be tracked via daily progress reports (DPRs).

The AOC was finalized and transmitted on May 12, 2011 ([AOC](#)).

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

WGE has submitted requested change in contractor. Memo can be found here: [Contractor Change Document](#)

From February 28 to March 1, 2011, restricted areas were barricaded in the warehouse. Floors in these areas were covered with paper flooring to prevent dust migration. These restricted areas were decontaminated for lead using Trisodium phosphate (1/2 cup per 1-gallon of water). The floors were scrubbed using wire brushes. XRF screenings were conducted after each area was scrubbed.

At the north end of the warehouse, a sealant prevented decontamination on the flooring. Grinding away two layers of concrete were necessary to sufficiently decontaminate the area. Additional barricades were constructed to prevent spreading dust generated during grinding. Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

During decontamination, ambient air monitoring was performed with GilAir sampling pumps. Filters are being analyzed for lead. In addition, waste waters generated during decontamination are stored in 55-gallon drums and labeled appropriately for future disposal.

XRF screening levels for lead below 400 ppm are considered decontaminated. START and PRP contractors conducted XRF screenings. After completing decontamination, cleaned areas were sealed with poly to prevent future contamination.

On March 28, 2011, WGE began decontamination of the area between the restroom and the shared pathway designated Area A ([Warehouse Decontamination Map](#)). Built containment to contain dust,

water and conduct air monitoring activities.

PRP's contractor started decontamination of area between bathroom and shared pathway, washed with vinegar, and scrubbed with wire brush, vacuumed all water and contained in a 55 gallon drum with lead hazard stickers. A tanvasco grinder was used on the floor, all dust vacuumed and contained in a contractor bag with lead hazard stickers, and placed into a 55 gallon drum. The floor was washed with vinegar to complete decontamination procedures.

Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

On March 31, 2011 through April 1, 2011, WGE marked 2 ft by 2 ft grids and conducted XRF readings. START collected confirmation XRF readings. Any readings above 400 ppm were additionally decontaminated and re-screened. All areas in Area A were decontaminated to below 400 ppm ([Warehouse Decontamination Map](#)).

On April 4, 2011 through April 11 2011, WGE began decontamination of designated Area B ([Warehouse Decontamination Map](#)). WGE began decontamination of the walls, steel beams, insulation and ceiling. START collected confirmation XRF readings. Readings were above 400 ppm. As such START conducted wipe sampling at several locations. The locations were below 400 ppm.

April 12, 2011 through April 25, 2011, WGE continued with decontamination of Area B. WGE has completed cleaning the ceiling, walls and side insulation panels (between the top of the building walls and below the roof line). START conducted wipe sampling at several locations along the insulation panels. The wipe samples were screened using the XRF. Readings were below 400 ppm.

April 26, 2011 through May 19, 2011, WGE continued with decontamination of Area B. WGE has completed cleaning the walls and steel support beams. WGE also completed decontamination of the floor and will mark 2 ft by 2 ft grids and conduct XRF readings. WGE will also conduct wipe sampling for XRF screening along the walls and steel support beams. During the week of May 16, 2011 START will verify XRF readings Contractor Daily Progress Reports (DPRs) can be found in the documents section. Here is a link for May 16, 2011: ([DPR 5-16-11](#)).

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data during the screening of the floor path area (loading docks and walk paths).
3. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area A ([Warehouse Decontamination Map](#)).

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

An [Access Agreement](#) has been secured and [NOI](#) CERCLA Cost Recovery and Legal support have been initiated. PRPs have been identified. The signed Enforcement Action Memorandum was submitted as final on May 12, 2011 ([Action Memo](#)). The work continues under OSC oversight.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

PRP submitted additional work plan and [Schedule Revision](#) for remainder of the affected warehouse.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

### **2.3 Logistics Section**

No information available at this time.

### **2.4 Finance Section**

No information available at this time.

### **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

No information available at this time.

## **4. Personnel On Site**

1 START

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 POLLUTION/SITUATION REPORT  
 Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 Region IV**

**Subject:** POLREP #8  
 Time Critical Removal Action Continues  
 Welch Group Environmental (WGE) Palmetto Hwy  
 B4F6  
 Belton, SC  
 Latitude: 34.5228881 Longitude: -82.4942948

**To:**

**From:** Leo Francendese, OSC

**Date:** 6/20/2011

**Reporting Period:** 5-20 through 6-20

**1. Introduction**

**1.1 Background**

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

**1.1.1 Incident Category**

PRP (Potentially Responsible Party) Lead Emergency Response with EPA Oversight

**1.1.2 Site Description**

This site is part of the Welch Group Environmental (WGE) Comprehensive Environmental Response Compensation Liability Act (CERCLA) response. South Carolina Department of Health and Environmental Control (SCDHEC) referred WGE operations to Emergency Response and Removal Branch (ERRB) in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a mutli-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the On Scene Coordinator (OSC) was notified by

SCDHEC on 2-4-2011 that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a site walk on 2-7-2011.

WGE no longer stores property at this location. X-Ray Fluorescence (XRF) readings for lead ranged from the low hundreds to 35,000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 Resource Conservation and Recovery Act (RCRA).

The RSE for the WGE properties was completed in early 3-2011. Recommendations to continue decontamination of the affected warehouse interior were documented.

The PRP removal action workplan (RAWP) amendments to continue remediation efforts was approved on 3-19-2011 ([Approved Workplan Amendments](#)). Progress of the work can be tracked via daily progress reports (DPRs).

The Administrative Order on Consent (AOC) was finalized and transmitted on 5-12-2011 ([AOC](#)).

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

WGE has submitted requested change in contractor. Memo can be found here: [Contractor Change Document](#)

From 2-28 to 3-1, 2011, restricted areas were barricaded in the warehouse. Floors in these areas were covered with paper flooring to prevent dust migration. These restricted areas were decontaminated for lead using Trisodium phosphate (1/2 cup per 1-gallon of water). The floors were scrubbed using wire brushes. XRF screenings were conducted after each area was scrubbed.

At the north end of the warehouse, a sealant prevented decontamination on the flooring. Grinding away two layers of concrete were necessary to sufficiently decontaminate the area. Additional barricades were constructed to prevent spreading dust generated during grinding. Workers wore level C personal protective equipment and a High Efficiency Particulate Air (HEPA) vacuum was used to contain the dust from grinding.

During decontamination, ambient air monitoring was performed with GilAir sampling pumps. Filters are being analyzed for lead. In addition, waste waters generated during decontamination are stored in 55-gallon drums and labeled appropriately for future disposal.

XRF screening levels for lead below 400 ppm are considered decontaminated. Superfund Technical Assistance and Response Team (START) and PRP contractors conducted XRF screenings. After completing decontamination, cleaned areas were sealed with poly to prevent future contamination.

On 3-28-2011:

- WGE began decontamination of the area between the restroom and the shared pathway designated Area A ([Warehouse Decontamination Map](#)). Built containment to contain dust, water and conduct air monitoring activities.
- PRP's contractor started decontamination of area between bathroom and shared pathway, washed with vinegar, and scrubbed with wire brush, vacuumed all water and contained in a 55 gallon drum with lead hazard stickers. A tanvasco grinder was used on the floor, all dust vacuumed and contained in a contractor bag with lead hazard stickers, and placed into a 55 gallon drum. The floor was washed with vinegar to complete decontamination procedures.
- Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

On 3-31-2011 through 4-1-2011:

- WGE marked 2 ft by 2 ft grids and conducted XRF readings. START collected confirmation XRF readings. Any readings above 400 ppm were additionally decontaminated and re-screened. All areas in Area A were decontaminated to below 400 ppm ([Warehouse Decontamination Map](#)).

On 4-4-2011 through 4-1-2011:

- WGE began decontamination of designated Area B ([Warehouse Decontamination Map](#)). WGE began decontamination of the walls, steel beams, insulation and ceiling. START collected confirmation XRF readings. Readings were above 400 ppm. As such START conducted wipe sampling at several locations. The locations were below 400 ppm.

4-12-2011 through 4-25-2011:

- WGE continued with decontamination of Area B. WGE has completed cleaning the ceiling, walls and side insulation panels (between the top of the building walls and below the roof line).
- START conducted wipe sampling at several locations along the insulation panels. The wipe samples were screened using the XRF. Readings were below 400 ppm.

4-26-2011 through 5-16-2011:

- WGE continued with decontamination of Area B. WGE has completed cleaning the walls and steel support beams.
- WGE also completed decontamination of the floor and will mark 2 ft by 2 ft grids and conduct XRF readings.
- WGE will also conduct wipe sampling for XRF screening along the walls and steel support beams.
- During the week of 5-16-2011 START will verify XRF readings.

5-17-2011 through 5-19-2011:

- WGE completed decontamination of Area B. START verified WGE XRF results on the floor, walls and support beams. All verified XRF results were below below 400 ppm. Contractor Daily Progress Reports (DPRs) can be found in the documents section.

5-23-2011 through 6-20-2011:

- WGE also began working on Area C of the warehouse floor, clearing equipment and miscellaneous items. Here is a link for 6-2-2011: ([DPR 6-20-11](#)).

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted reconnaissance of the decontamination process and conducted confirmation



screening of the PRP's contractor data during the screening of the floor path area (loading docks and walk paths).

3. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area A ([Warehouse Decontamination Map](#)).

4. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area B ([Warehouse Decontamination Map](#)).

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

An [Access Agreement](#) has been secured and [NOFI](#) CERCLA Cost Recovery and Legal support have been initiated. PRPs have been identified. The signed AOC and Enforcement Action Memorandum was submitted as final on 5-12-2011 ([Action Memo](#)). The work continues under OSC oversight.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

PRP submitted additional work plan and [Schedule Revision](#) for remainder of the affected warehouse.

OSC has scheduled a meeting with the Welch Group for RAWP review in Atlanta on 6-24-2011.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

## **2.3 Logistics Section**

No information available at this time.

## **2.4 Finance Section**

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

No information available at this time.

## **4. Personnel On Site**

No information available at this time.

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV**

**Subject:** POLREP #9  
Time Critical Removal Action Continue  
Welch Group Environmental (WGE) Palmetto Hwy  
B4F6  
Belton, SC  
Latitude: 34.5228881 Longitude: -82.4942948

**To:**

**From:** Leo Francendese, OSC

**Date:** 7/11/2011

**Reporting Period:** 6-21 through 7-11

## 1. Introduction

### 1.1 Background

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

#### 1.1.1 Incident Category

PRP (Potentially Responsible Party) Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) Comprehensive Environmental Response Compensation Liability Act (CERCLA) response. South Carolina Department of Health and Environmental Control (SCDHEC) referred WGE operations to Emergency Response and Removal Branch (ERRB) in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the On Scene Coordinator (OSC) was notified by

SCDHEC on 2-4-2011 that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a site walk on 2-7-2011.

WGE no longer stores property at this location. X-Ray Fluorescence (XRF) readings for lead ranged from the low hundreds to 35,000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 Resource Conservation and Recovery Act (RCRA).

The RSE for the WGE properties was completed in early 3-2011. Recommendations to continue decontamination of the affected warehouse interior were documented.

The PRP removal action workplan (RAWP) amendments to continue remediation efforts was approved on 3-19-2011 ([Approved Workplan Amendments](#)). Progress of the work can be tracked via daily progress reports (DPRs).

The Administrative Order on Consent (AOC) was finalized and transmitted on 5-12-2011 ([AOC](#)).

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

WGE has submitted requested change in contractor. Memo can be found here: [Contractor Change Document](#)

From 2-28 to 3-1, 2011, restricted areas were barricaded in the warehouse. Floors in these areas were covered with paper flooring to prevent dust migration. These restricted areas were decontaminated for lead using Trisodium phosphate (1/2 cup per 1-gallon of water). The floors were scrubbed using wire brushes. XRF screenings were conducted after each area was scrubbed.

At the north end of the warehouse, a sealant prevented decontamination on the flooring. Grinding away two layers of concrete were necessary to sufficiently decontaminate the area. Additional barricades were constructed to prevent spreading dust generated during grinding. Workers wore level C personal protective equipment and a High Efficiency Particulate Air (HEPA) vacuum was used to contain the dust from grinding.

During decontamination, ambient air monitoring was performed with GilAir sampling pumps. Filters are being analyzed for lead. In addition, waste waters generated during decontamination are stored in 55-gallon drums and labeled appropriately for future disposal.

XRF screening levels for lead below 400 ppm are considered decontaminated. Superfund Technical Assistance and Response Team (START) and PRP contractors conducted XRF screenings. After completing decontamination, cleaned areas were sealed with poly to prevent future contamination.

On 3-28-2011:

- WGE began decontamination of the area between the restroom and the shared pathway designated Area A ([Warehouse Decontamination Map](#)). Built containment to contain dust, water and conduct air monitoring activities.
- PRP's contractor started decontamination of area between bathroom and shared pathway, washed with vinegar, and scrubbed with wire brush, vacuumed all water and contained in a 55 gallon drum with lead hazard stickers. A tanvasco grinder was used on the floor, all dust vacuumed and contained in a contractor bag with lead hazard stickers, and placed into a 55 gallon drum. The floor was washed with vinegar to complete decontamination procedures.
- Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

On 3-31-2011 through 4-1-2011:

- WGE marked 2 ft by 2 ft grids and conducted XRF readings. START collected confirmation XRF readings. Any readings above 400 ppm were additionally decontaminated and re-screened. All areas in Area A were decontaminated to below 400 ppm ([Warehouse Decontamination Map](#)).

On 4-4-2011 through 4-1-2011:

- WGE began decontamination of designated Area B ([Warehouse Decontamination Map](#)). WGE began decontamination of the walls, steel beams, insulation and ceiling. START collected confirmation XRF readings. Readings were above 400 ppm. As such START conducted wipe sampling at several locations. The locations were below 400 ppm.

4-12-2011 through 4-25-2011:

- WGE continued with decontamination of Area B. WGE has completed cleaning the ceiling, walls and side insulation panels (between the top of the building walls and below the roof line).
- START conducted wipe sampling at several locations along the insulation panels. The wipe samples were screened using the XRF. Readings were below 400 ppm.

4-26-2011 through 5-16-2011:

- WGE continued with decontamination of Area B. WGE has completed cleaning the walls and steel support beams.
- WGE also completed decontamination of the floor and will mark 2 ft by 2 ft grids and conduct XRF readings.
- WGE will also conduct wipe sampling for XRF screening along the walls and steel support beams.
- During the week of 5-16-2011 START will verify XRF readings.

5-17-2011 through 5-19-2011:

- WGE completed decontamination of Area B. START verified WGE XRF results on the floor, walls and support beams. All verified XRF results were below below 400 ppm. Contractor Daily Progress Reports (DPRs) can be found in the documents section.

5-23-2011 through 6-20-2011:

- WGE also began working on Area C of the warehouse floor, clearing equipment and miscellaneous items. Here is a link for 6-2-2011: ([DPR 6-20-11](#)).

6-21-2011 through 7-11-2011:

- WGE continued working on Area C of the warehouse floor, clearing equipment and miscellaneous items.

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data during the screening of the floor path area (loading docks and walk paths).
3. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area A ([Warehouse Decontamination Map](#)).
4. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area B ([Warehouse Decontamination Map](#)).

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

An [Access Agreement](#) has been secured and [NOFI](#) CERCLA Cost Recovery and Legal support have been initiated. PRPs have been identified. The signed AOC and Enforcement Action Memorandum was submitted as final on 5-12-2011 ([Action Memo](#)). The work continues under OSC oversight.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

PRP submitted additional work plan and [Schedule Revision](#) for remainder of the affected warehouse.

On 6-24-2011 the OSC met in Atlanta with WGE to resolve outstanding RAWP issues. The meeting resulted in establishing timelines and deliverables for time critical removal action at the site. WGE estimates completing the warehouse by 8-14-11.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

## **2.3 Logistics Section**

No information available at this time.

## **2.4 Finance Section**

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

No information available at this time.

## **4. Personnel On Site**

No information available at this time.

## **5. Definition of Terms**

No information available at this time.

**6. Additional sources of information**

No information available at this time.

**7. Situational Reference Materials**

No information available at this time.

### ACCESS AUTHORIZATION

1. I, Cummings Gary (owner), being the beneficiary of property located at 110 Palmetto Hwy  
and such, having the authority to sign this authorization. Belton, SC 29627

2. I grant authorization to the United States Environmental Protection Agency (EPA), its officers, employees, contractors and other authorized representatives access to the property which lies on 110 Palmetto Parkway. EPA's activities at the Site may include, but not be limited to the following:

- a. The collection of surface, subsurface soil, sediment, air and waste samples as may be determined to be necessary;
- b. inspecting, sketching, photographing, and/or video taping the premises;
- c. transporting equipment onto and about the Site, as necessary to accomplish the activities listed above;
- d. temporary storage of equipment on and throughout the Site, as necessary, to accomplish the activities listed above;
- e. removal activities as determined by the OSC to abate releases or threats of releases to the environment;

3. The consent for access and use granted herein will commence on 2/7/11 and will continue until EPA completes the sampling activities.

4. I, Cummings Gary, realize that these actions by EPA are undertaken pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act (Superfund), 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) (Public Law 99-499).

C. Cummings Gary 2/7/11  
Signature Date

C. Cummings Gary  
Print Name



## **Phillips Recoveries, Inc.**

508 Cherokee Rd. Pelzer, SC 29669

Phone: 864-947-6861

Fax: 864-947-4002

[vphillips@phillipsrecoveries.com](mailto:vphillips@phillipsrecoveries.com)

February 12, 2011

Welch Group Environmental Site wide Removal Actions Work plans

RE: SCOPE OF WORK – REMOVAL ACTIONS WORKPLANS

Palmetto Hwy, Belton, SC – Lead Contaminated Site

Containment Control

This action is being conducted under CERCLA authority and at the direction of the EPAOSC. All actions are subject to “in the field” changes at the direction of the EPAOSC as per CERCLA and the National Contingency Plan (NCP).”

### SCOPE OF WORK:

1. Phillips Recoveries, Inc. (PRI) will provide trained technicians to secure the known contaminated area in the warehouse. This means that non response related personnel are not allowed in this area until remediation is complete. Provisions to allow non response foot traffic thru the main door using a floor covering (ie. plastic liner) are acceptable as discussed. Barrier will be placed around EZ to prohibit foot traffic as referred to above. Attached site map 3.1
2. PRI will provide personnel and XRF equipment to collect initial exposure data that will be placed on a grid for EPA representative approval before proceeding to initiate remediation procedures.
3. Remediation Procedures will include set up of decontamination areas in a safe area where materials that are cleaned can be placed. Cleaning will consist of dry removal of dust with microfiber clothes to be bagged in plastic bags and drummed in approved 55 gallon DOT approved drums cleaned and stored at Belton site to await disposal.
4. If dry removal fails to reduce contamination to 400ppm, water will be used with cleaning solution. Rinse water and detergent solution will be in separate containers to prevent reapplication of lead infused water. Minimal water will be utilized to minimize run-off and water collection for disposal.
5. All water will be appropriately drummed for storage and disposal by Welch Environmental Group.
6. In decontamination area, it will consist of the first stage as the location for dry brush removal of any contamination to PRI personnel and equipment. Second stage will consist of washing equipment and rinsing personnel PPE and containing rinse water in containment area and all rinse water will be collected and left onsite. Third stage will be area for changing of PPE and disposal of all PPE and contaminated materials. All contaminated PPE and hand tools that cannot be cleaned to acceptable will be left onsite for disposal.
7. All equipment will be tested by the EQ official for the EPA using an XRF machine with acceptable limits of 400ppm or less.
8. Selected PPE will consist of the following:
  - Level C: Full-face or half mask, air purifying respirators (NIOSH approved).
  - Tyvek (1) or Syranex suits (1)
  - Rubber Gloves
  - Rubber Boots
  - Hard Hat (1)

Cc: Leo Francendese  
Glenn Welch

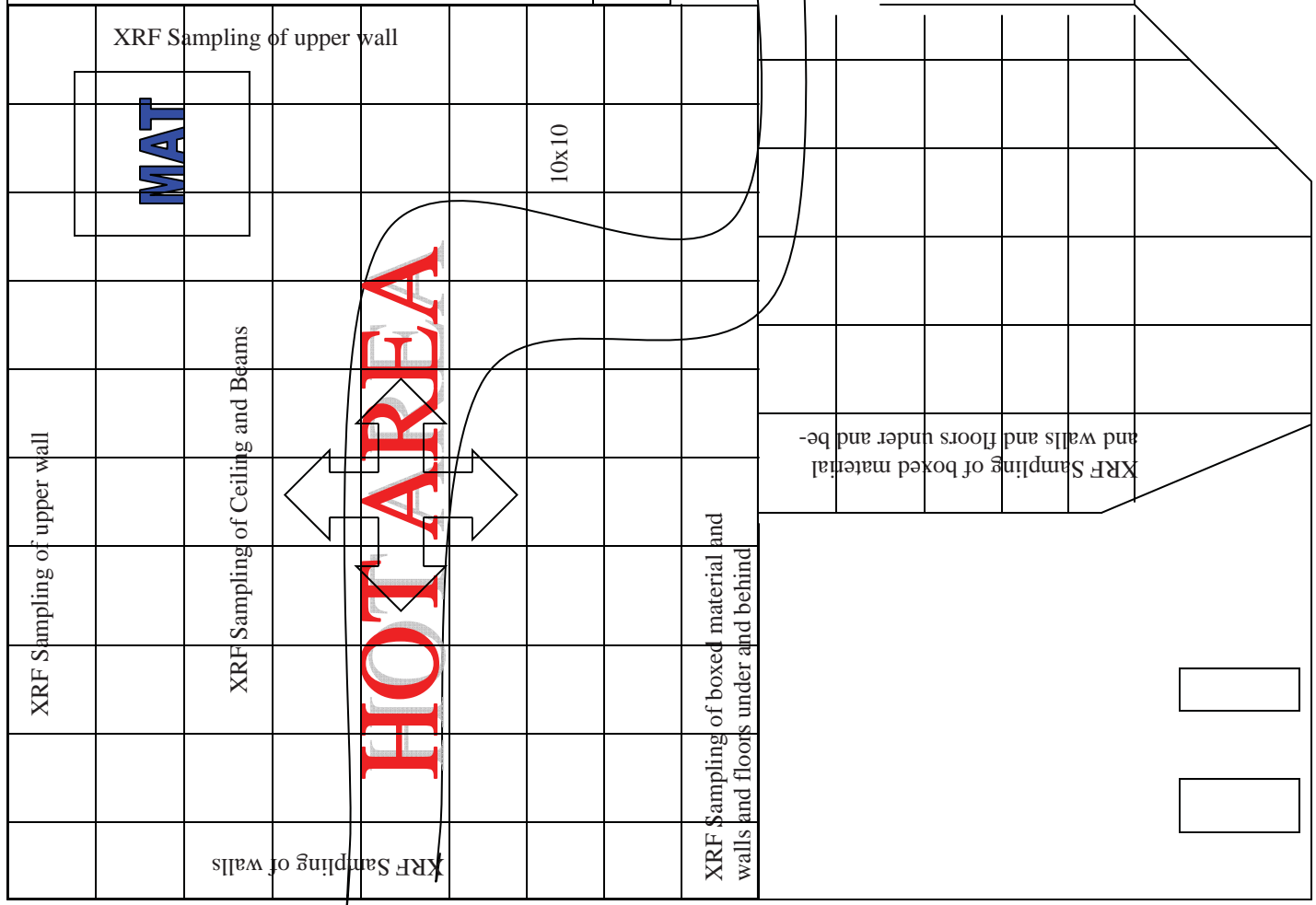
Footnote (1) Optional, as applicable





Clean area

0 - 0 0 0 0 0 0 0 0



Traffic area with plastic path

Trip to:

An Med Health Medical Center  
800 N Fant St  
Anderson, SC 29621  
(864) 512-1000

11.34 miles

17 minutes

1. Start out going EAST on BREAZEALE ST / SC-63 toward SC-20 / N MAIN ST. Go 0.02 MI

2. Take the 1st RIGHT onto N MAIN ST / SC-20. If you are on SC-247 and reach MAIN STREET SQ you've gone a little too far Go 0.07 MI

3. Take the 1st RIGHT onto ANDERSON ST / US-178 / US-76 / SC-20. Continue to follow US-178 W / US-76 W. If you are on S MAIN ST and reach MCGEE WAY you've gone a little too far Go 10.6 MI

4. Turn RIGHT onto S FANT ST. S FANT ST is 0.1 miles past E MORRIS ST. Go 0.7 MI

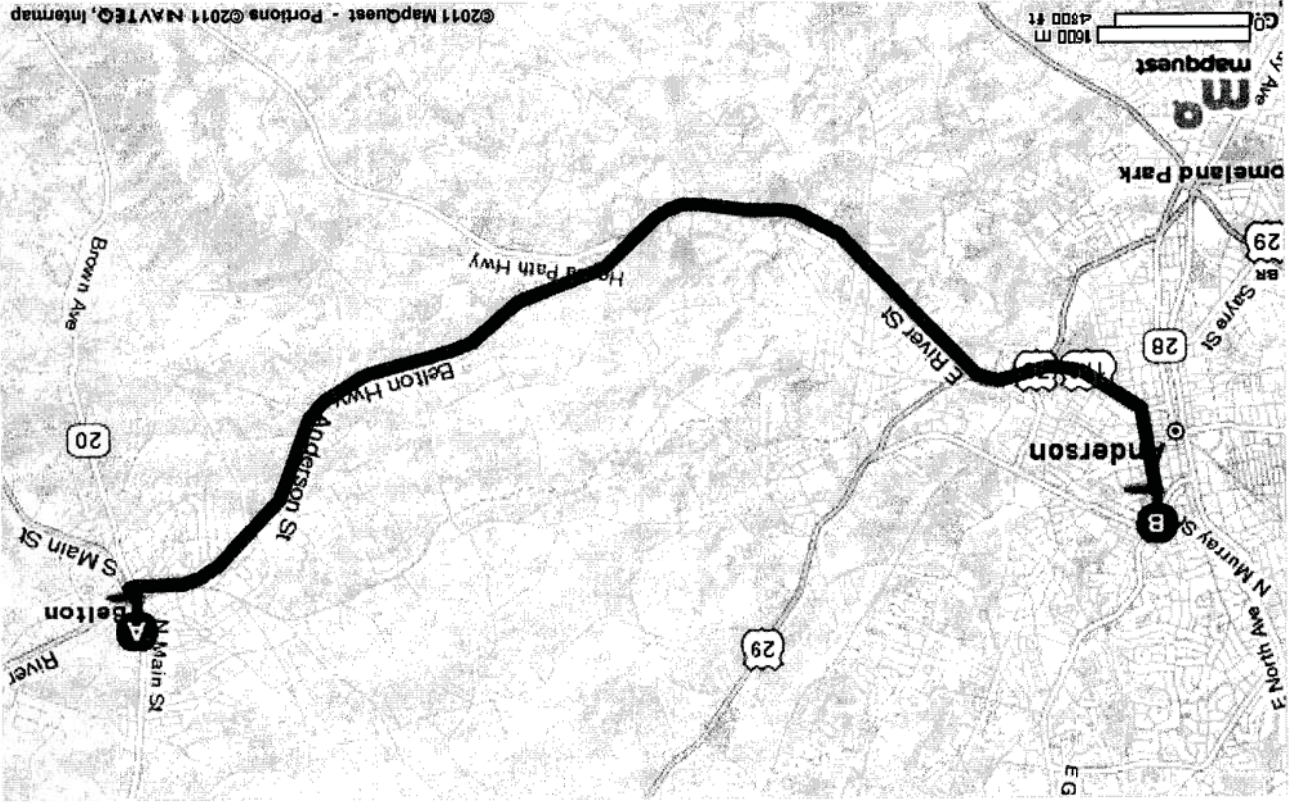
5. 800 N FANT ST is on the RIGHT. Your destination is just past E CALHOUN ST. If you reach DUCKETT CIR you've gone a little too far

An Med Health Medical Center  
800 N Fant St, Anderson, SC 29621  
(864) 512-1000

11.3 mi

Notes

Total Travel Estimate: 11.34 miles - about 17 minutes



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Date: February 10, 2011

SUBJ: Notice of Federal Interest

Dear Mr Glenn Welch (operator) and Mr Cummings Gary (owner):

The purpose of this letter is to inform you that a release or threatened release of hazardous substances, pollutants or contaminants for which you may be responsible, has occurred or threatens to occur at the following location:

110 Palmetto Hwy  
Belton, SC 29621

The United States Environmental Protection Agency (EPA) has an interest in this incident and may conclude that a removal action is necessary to clean up or contain the release. A removal action is an action that may be necessary to monitor, assess and evaluate the release or threat of release of hazardous substances, pollutants or contaminants and includes physical removal and disposal of hazardous substances, pollutants or contaminants. Pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), EPA is authorized to address this release or threatened release.

If EPA determines that a removal action is necessary, EPA may request that liable parties conduct the removal action if EPA determines that the liable parties will conduct such action promptly and properly. Liable parties under Section 107 of CERCLA generally include the current owner or operator of the property, anyone who owned or operated at the property when hazardous substances were disposed, generators of hazardous substances disposed of at the Site, and transporters of hazardous substances.

EPA's On Scene Coordinator shall determine the adequacy of the removal action performed by liable parties and shall provide guidance and oversight of such action. The On-Scene Coordinator for this incident is Mr Leo Francendese. Please contact the On-Scene Coordinator before taking any action to address this release or threatened release.

If liable parties decline the opportunity to take appropriate action or if EPA determines that liable parties cannot perform the removal action promptly and properly, EPA may conduct the removal action itself. If EPA conducts the removal action, liable parties will be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

You are strongly encouraged to contact an attorney who can advise you of your rights and responsibilities under CERCLA. Should you require further information concerning this matter, please contact the On-Scene Coordinator by telephone at (404) 562-8700 or you may write to the address below.



Mr Leo Francendese  
On-Scene Coordinator  
404 562 8772  
U.S. Environmental Protection Agency  
Region 4  
ERRB, Waste Division  
61 Forsyth Street S.W.  
Atlanta, Georgia 30303

Receipt and Acknowledgment:

Received by: C Cummings Gray Date: 2/13/11  
Date: \_\_\_\_\_  
Printed name: C Cummings Gray  
Address: 110 Palmetto Parkway  
Belton, SC 29627

Mailing - PO Box 476  
Belton, SC  
29627

### 3.0 SITEWIDE CONTROL / CONTAINMENT

#### Welch Group Environmental – PALMETTO HWY – BELTON, SC

**This action is being conducted under CERCLA authority and at the direction of the EPAOSC. All actions are subject to “on the field” changes at the direction of the EPAOSC as per CERCLA and the National Contingency Plan (NCP).”**

(In compliance with 29 CFR 1910.120(b)(4)(ii)(F) and 29 CFR 1910.120(d))

**This site control and containment program** is designed to reduce the spread of hazardous substances from contaminated areas to clean areas, to identify and isolate contaminated areas of the site, to facilitate emergency evacuation and medical care, to prevent unauthorized entry to the site, and to deter vandalism and theft.

The site control program includes the elements specified in 29 CFR 1910.120(d) and provides the following site-specific information:

- OSHA PEL of 0.05mg/m<sup>3</sup> will be maintained on workers during cleaning
- PEL will be monitored using a DataRam instrument
- a site map, indicating site perimeter and work zones
- site access procedures
- site security
- site work zones including standard operating procedures
- use of the buddy system
- external communications

**Michael Phillips or Michael Marovich** is responsible for evaluating site conditions and for verifying that the site control program functions effectively. The site control program is updated regularly to reflect current site conditions, work operations, and procedures.

### 3.1 Site Map

A map of this site, showing site boundaries, designated work zones, and points of entry and exit is provided in Figure 3.1; attached.

### 3.2 Site Access

Access to this site is restricted to reduce the potential for exposure to its safety and health hazards. During hours of site operation, site entry and exit is authorized only at the point(s) identified in Figure 3-1. Entry and exit at these points is restricted to approved personnel. The contaminated area in the warehouse will be secured and only approved personnel are allowed in this area. Non response related personnel are not allowed in until remediation is complete. However, non response foot traffic thru the main door will be acceptable if using a floor covering (ie. Plastic liner) as previously discussed. When the site is not operating, access to the site is controlled by Welch Group Environmental.

### 3.3 Site Security

**Welch Group Environmental** is responsible for establishing and maintaining site security during working hours.

Security is maintained in the Support Zone and at Access Control Points to ensure only authorized entrants access the site.

- \* A barricade or other physical barrier is erected around the perimeter of the site to prevent unauthorized entry or exit.

### 3.4 Site Work Zones

This site is divided into three (3) major zones, described below and shown in Figure 3-1. These zones are characterized by presence or absence of chemical hazards and the activities performed within them.

Zone boundaries are clearly marked at all times and the flow of personnel and equipment among the zones is controlled.

Whenever boundaries are adjusted, zone markings are also changed and workers are immediately notified of the change.

The following criteria were considered in establishing the site work zones:

- \* required clean-up activities
- \* inside traffic patterns
- \* suspicious area
- \* silt fencing
- \* decontamination of personnel
- \* decontamination of equipment



## Exclusion Zone

The Exclusion Zone is the area where hazardous substances are known or suspected to be present and pose the greatest potential for exposure. Remediation operations (site clean-up) are performed in the Exclusion Zone. At this site, the Exclusion Zone boundaries are marked with the following: **Flagged or Hazard Tape**

Personnel and equipment will enter and exit the Exclusion Zone from the designated access points in the Contamination Reduction Zone (CRZ), shown in Figure 3-1.

Personnel in the Exclusion Zone will adhere to the following Standard Operating Procedures (SOPs):

### Exclusion Zone (ExZ) SOPs

- \* Check in and out of this zone at the designated access point.
- \* Use the buddy system at all times.
- \* Wear the PPE required for this zone (see PPE section of this HASP).
- \* Do not smoke, eat, or drink.
- \* Monitor self and buddy for signs of heat stress and other difficulties.
- \* Alert supervisor to signs of unanticipated hazards.
- \* Do not engage in horseplay.
- \* Monitor self and buddy for PPE improper fittings, rips, tears, and/or damage.

## Contamination Reduction Zone (CRZ)

The CRZ is located between the Exclusion Zone and the Support Zone (clean zone). Its primary purpose is for decontamination of workers and equipment. The CRZ also serves as a buffer between the Exclusion Zone and Support Zone, to limit the potential for contamination to spread to the Support Zone and outlying areas. At this site, the CRZ boundaries are marked with hazard tape or hay bales for equipment routes.

Workers and equipment exit the Exclusion Zone through the designated access point(s) into the CRZ. Workers and equipment are then decontaminated in the CRZ, according to the procedures specified in the Decontamination section of this HASP. Workers and equipment then exit the CRZ into the Support Zone through the designated access points, shown in Figure 3-1.

If necessary, emergency decontamination procedures are implemented. Emergency decontamination procedures are described in the site's emergency response program.

Personnel in the CRZ will adhere to the following SOPs:

### Contamination Reduction Zone (CRZ) SOPs

- \* Check in and out of this zone at the designated access point.
- \* Wear the PPE required for this zone (see PPE section of this HASP).
- \* Do not smoke, eat, or drink.
- \* Monitor self and buddy for signs of heat stress and other difficulties.
- \* Alert supervisor to signs of unanticipated hazards.
- \* Do not engage in horseplay.
- \* Monitor self and buddy for PPE improper fittings, rips, tears, and/or damage.

### **Support Zone**

The Support Zone is the clean area of the site, beyond the outer boundary of the CRZ. There should be no contamination in this zone. Administrative, clerical, and other support functions are based in the Support Zone.

The Support Zone is shown in Figure 3-1 and its boundaries are marked by hazard tape or flagged..

Within the Support Zone, personnel adhere to the following SOPs:

### Support Zone (SZ) SOPs

- Check in and out of this zone from the CRZ at the designated site access point.
- Alert supervisor to signs of unanticipated hazards.
- Do not engage in horseplay.

The table below, Table 3-4, identifies the other zones on this site, and provides a description and SOPs for each zone.

| Table 3-4 Other Site Work Zones and SOPs |                                 |               |
|--|---------------------------------|---------------|
| Name of zone                             | Description of Zone/Demarcation | SOPs for Zone |
|  |                                 |               |

### 3.5 Buddy System

While working in the Exclusion Zone, site workers use the buddy system. The buddy system means that personnel work in pairs and stay in close visual contact to be able to observe one another and summon rapid assistance in case of an emergency. The responsibilities of workers using the buddy system include:

- \* remaining in close visual contact with partner,
- \* providing partner with assistance as needed or requested,
- \* observing partner for signs of heat stress or other difficulties,
- \* periodically checking the integrity of partner's PPE, and
- \* notifying the supervisor or other site personnel if emergency assistance is needed.

### 3.6 Site Communications

The following communication equipment is used to support on-site communications:

**(Complete the communication equipment information below, i.e., telephones, cell phones, two-way radios, and other forms communication equipment that apply to this site)**

|  |
|--|
| <b>Telephones at this site are located in the following areas:</b> |
|--|

|                 |
|-----------------|
| Each individual |
|-----------------|

|  |
|--|
| <b>A current list of emergency contact numbers is posted in the following locations:</b> |
|--|

|              |
|--------------|
| 800-947-6805 |
|--------------|

|   |
|---|
| <b>Two-way radios are available in the following locations:</b> |
|---|

|  |
|--|
| <b>The following people will carry two-way radios:</b> |
|--|

|   |
|---|
| <b>Other forms of communication on this site include:</b> |
| Hand Signals  |

Site personnel are trained to recognize and use hand signals when visual contact is possible but noise or PPE inhibit voice communication. These hand signals are listed below in Table 3-6.

| <b>Table 3-6 Site Communication – Hand Signals</b> |                |
|--|----------------|
| <b>Signal</b>                                      | <b>Meaning</b> |
|  |                |

**Figure 3-1 Map of Site Boundaries, Work Zones, and Entry/Exit Points**

**Insert site map with zone boundaries and access points here.**



### **3.7 NEAREST HOSPITAL**

Due to the potential dust generated during clean up and the levels of lead contamination located onsite; **the** attached map provides directions and distance to the closest hospital in the event workers or contractors need immediate medical assistance.

### **ATTACHMENT – MAP**

**From:** Leo Francendese

**Sent:** 02/14/2011 09:45 AM EST

**To:** "Vickie Phillips" <hartwelllakehouse@att.net>; welchgroup@gmail.com; "Jerry Partap" <jpartap@otie.com>; "Chris McCluskey" <mccluscd@dhec.sc.gov>

**Subject:** Re: WGE Revisions

These amendments satisfy the requested changes made by the OSC.

Approval to commence work at WGE Palmetto is given.

If

---

**From:** Vickie Phillips [hartwelllakehouse@att.net]

**Sent:** 02/14/2011 06:19 AM PST

**To:** Leo Francendese

**Subject:** WGE Revisions

Leo,

As per your request Sun, Feb. 13, 2011 @ 8:37pm.

If you have any questions, please give me a call on my cell at: 864-934-2047.

Vickie

Phillips Recoveries, Inc.

508 Cherokee Rd.

Pelzer, SC 29669

864-947-6861

864-947-4002 fax

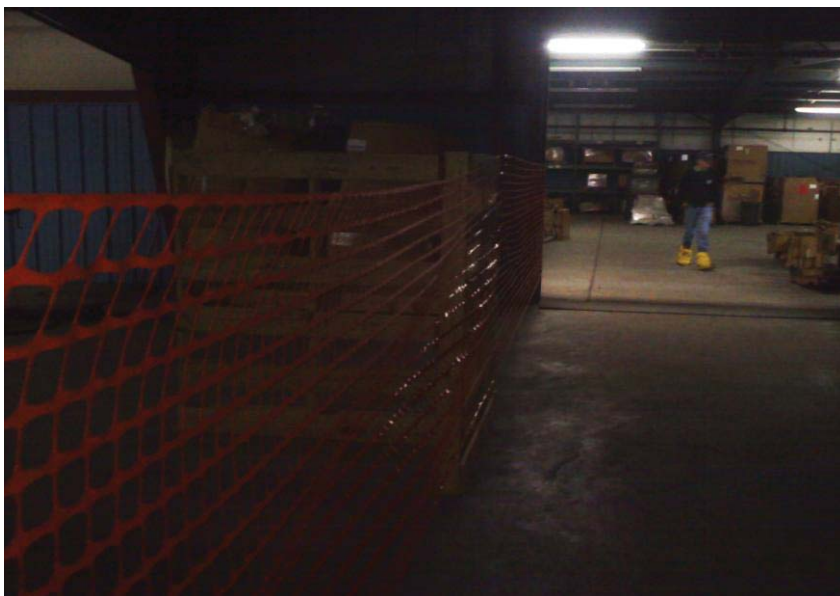
WGE Belton, SC - PALMETTO Site

## PROGRESS NOTES

Date: February 16, 2011

### COMPLETED ACTION:

1. Barricade Fencing was put in place to control access to Exclusion Zones.



2. Paper Floor covering was placed in designated areas along barricade paths and secured with duct tape.
3. Keys to facility were turned over to Jerry, EPA contract to gain access for daily XRF readings.

Report Submitted by: Vickie S. Phillips

[vphillips@phillipsrecoveries.com](mailto:vphillips@phillipsrecoveries.com)

Phillips Recoveries, Inc.

508 Cherokee Rd.

Pelzer, SC

1-800-947-6805



## Jerome Partap

---

**From:** Francendese.Leo@epamail.epa.gov  
**Sent:** Thursday, February 24, 2011 12:03 PM  
**To:** Glenn Welch; Jerome Partap; Chris McCluskey  
**Subject:** Re: Change of date on Work Plan

Approved  
My contractor will be onsite Monday.

Jerry, pls post

---

**From:** Glenn Welch [welchgroupenvironmental@gmail.com]  
**Sent:** 02/23/2011 08:53 PM EST  
**To:** Leo Francendese  
**Subject:** Change of date on Work Plan

Leo,

Attached you will find the Work Plan with the corrected date.

Regards,

--

Glenn E. Welch (President/CEO)  
(864)314-3803

Welch Group Environmental  
118 White Oak Rd.  
Belton, SC 29627



To: Leo Francendese EPAOSC

From: Glenn Welch WGE President

Date: February 23, 2011

Subj: Requested Amendment to the REMOVAL ACTIONS WORK PLAN  
WGE Palmetto Parkway Site Belton, SC

As discussed today via the phone, we request the following changes to the current RAWP (the current RAWP can be found at this link

<http://www.epaosc.org/sites/6682/files/WelchGroup%20PalmettoHwy%20SOW%2002132011.pdf>):

1. In the interest of reducing the immediate size of the affected area, we would like to address the area in and around the loading dock first. Please see referenced maplink:

(<http://www.epaosc.org/sites/6682/files/WelchGroupPalmettoHwy%20internal%20map%20and%20Ogrid.pdf>.)

2. Our pilot tests indicated that dry removal may not be adequate and that an additional method of wet cleaning (re. misting) may be required to complete the work. Additional use of a vacuum will be considered as the work progresses in order to minimize dust and maximize operational efficiency. All wastestreams will be handled in accordance with RCRA disposal requirements and all equipment will be properly deconned as per the HASP. In addition, we appreciate the opportunity to temporarily store the drummed waste at the WGE Belton Site as it awaits future disposal.

3. When the final stage of cleanup is complete, the area will be tested with an XRF analyzer to ensure lead levels are brought down to acceptable levels (less than 400 ppm). This will be accomplished by taking one reading in an area 2 feet by 2 feet, or taking a 5 point composite reading in a 5 foot by 5 foot area.

We understand that quality control will be conducted by your contractor using their XRF equipment as necessary to confirm attainment.

4. We plan to conduct this action on February 28th of 2011 and expect completion by the end of the day on the 28<sup>th</sup>.

Welch Group Environmental  
118 White Oak Road  
Belton, SC 29627

All work will be done in accordance with the approved Health and Safety Plan for the WGE Palmetto Pkwy Site which can be found here:

<http://www.epaosc.org/sites/6682/files/WGE%20H&S%20PALMETTO%20Site%20Rev.pdf>

All work will be followed by a Daily Progress Report (DPR) which will be submitted at the end of the business day for that period of operations.

\*\*\*\*\*MEMO\*\*\*\*\* The new contractor we will be using for this Work Plan is: A.C.T. Services located at 783 North Clayton Street in Lawrenceville, GA 30045. The Point of Contact is: Mick Robarts at (404) 391-9460.

Regards,

Glenn E. Welch

Welch Group Environmental  
118 White Oak Road  
Belton, SC 29627

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: February 28, 2011

1. Mopped floor with TSP solution. Scrubbed with wire brushes.
2. Will be taking approximately 100 shots with XRF Analyzer in a 2X2 grid to confirm the level is brought under 400 ppm.
3. Crew size was two workers, 1 supervisor.
4. Waste generated was water with TSP and lead and Tyvek suits, gloves.
5. All water vacuumed with HEPA VAC and emptied into 55 gallon drum for disposal.
6. All solid waste put into sealed plastic bags with "Danger Lead" stickers, and placed into a 55 gallon drum for disposal.
7. Will complete testing and reclean any Hot Spots on Tuesday, March 1, 2011.

Report Submitted By: Scott Shaw (Safety CoordinatorPA

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-446-0405





WGE Belton, SC- PALMETTO Site

Progress Notes

Date: March 1, 2011

1. Due to many "hot spots", we recleaned the total area with wire brush, TSP, and Vinegar.
2. We will be taking approximately 100 shots with XRF Analyzer in a 2X2 grid to confirm the level is brought under 400 ppm.
3. Crew size was 4 workers, 1 supervisor.
4. All water vacuumed with HEPA VAC and emptied into 55 gallon drum for disposal.
5. All solid waste was put into sealed plastic bags with "Danger Lead" stickers, and placed into a 55 gallon drum for disposal.
6. Waste generated was water with TSP, lead, Tyvek suites and gloves, and rags.
7. We will continue to clean for half a day tomorrow, but we will not be able to get our XRF guy back out here until Friday, March 4th.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-446-0405





WGE Belton, SC- PALMETTO Site

Progress Notes

Date: March 4, 2011

1. Finished cleaning the "hot" pathway area, tried with vinegar, this did not work. Used a tivasco grinder to make two passes on the floor, vacuumed dust with hepa vacuum.
2. Amanda took 30 shots with the xrf analyzer to verify floor was brought down below 400 ppm. Hot area cleaned and verified.
3. Crew size was 4 workers, 1 supervisor.
4. All water vacuumed with HEPA VAC and emptied into 55 gallon drum for disposal.
5. All solid waste was put into sealed plastic bags with "Danger Lead" stickers, and placed into a 55 gallon drum for disposal.
6. Waste generated was water with vinegar, lead, Tyvek suites and gloves, and rags.
7. The "hot area" shared access pathway has now been completely cleared and cleaned with the XRF.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-446-0405



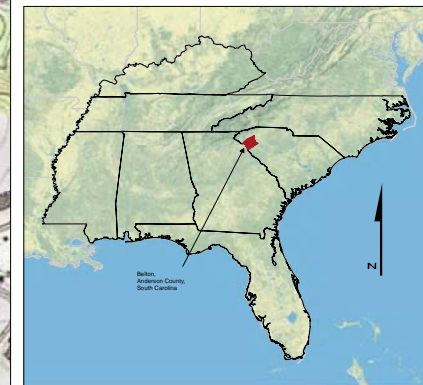




# Legend

▲ Site Location

0 Feet 1,500 3,000



WELCH GROUP ENVIRONMENTAL  
PALMETTO PARKWAY FACILITY,  
ANDERSON COUNTY,  
SOUTH CAROLINA  
TDD NO. TNA-05-003-0122

**FIGURE 1  
TOPOGRAPHICAL MAP**



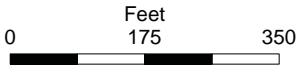
United States Environmental Protection Agency





# Legend

▲ Site Location



WELCH GROUP ENVIRONMENTAL  
PALMETTO PARKWAY FACILITY,  
ANDERSON COUNTY,  
SOUTH CAROLINA  
TDD NO. TNA-05-003-0122

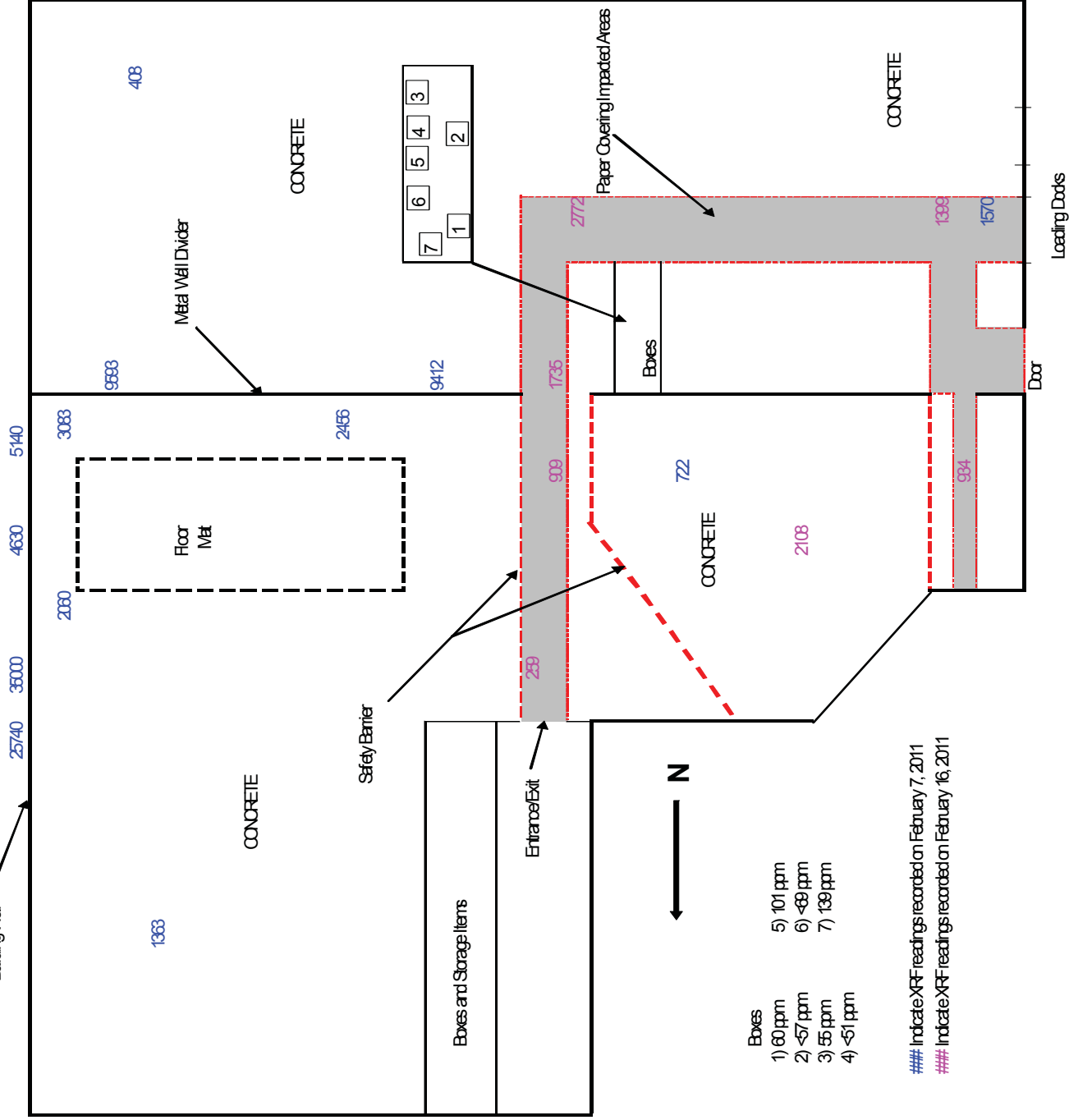
FIGURE 2  
AERIAL MAP



United States Environmental Protection Agency



Building Wall



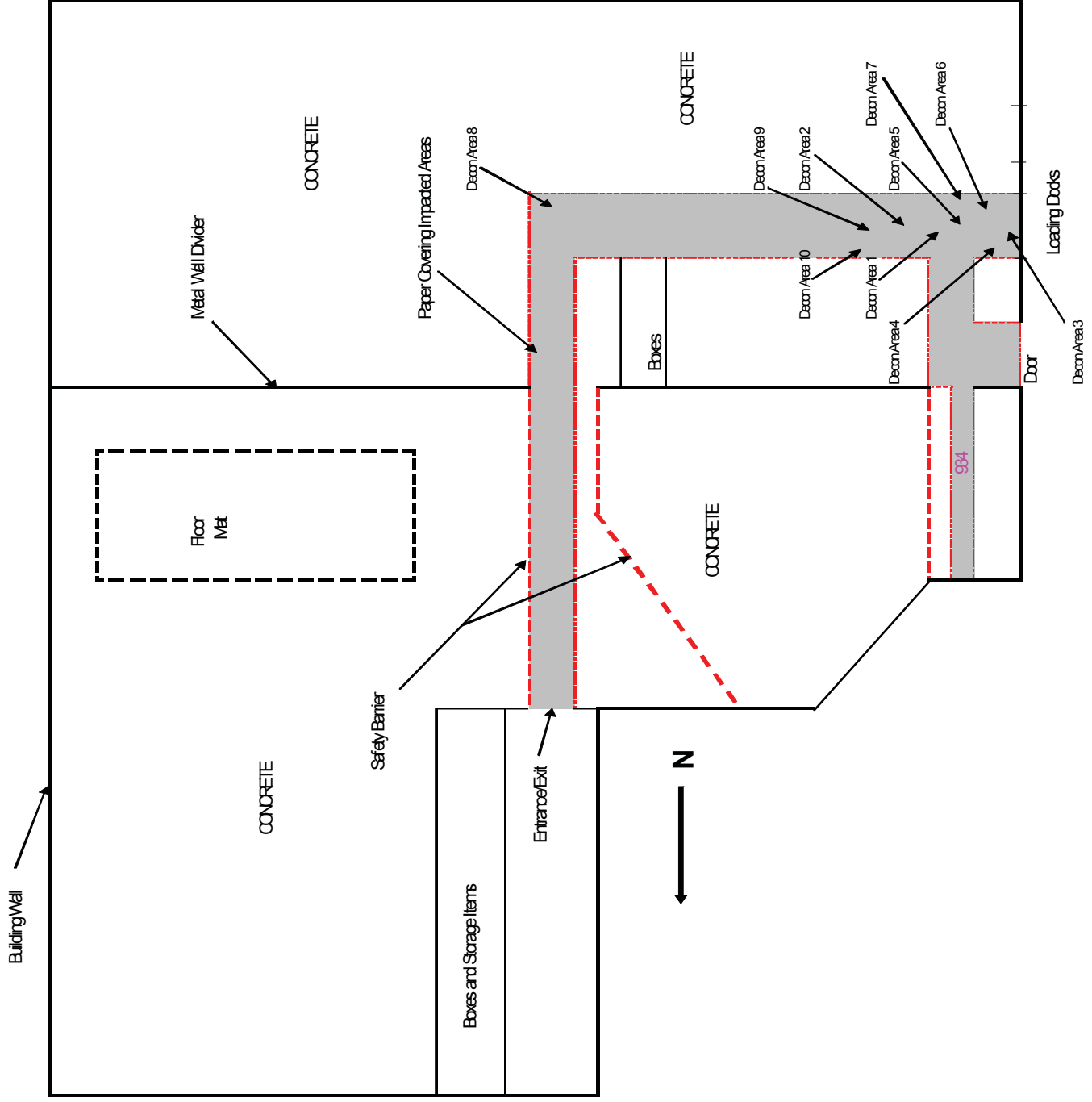
WELCH GROUP ENVIRONMENTAL  
PALMETTO PARKWAY FACILITY,  
ANDERSON COUNTY,  
SOUTH CAROLINA  
TDD NO. TNA-05-003-0122

**FIGURE 3**  
XRF READINGS RECORDED  
ON FEBRUARY 7 & 16, 2011



UNIVERSITY OF SOUTH CAROLINA  
SCHOOL OF ENVIRONMENTAL & FORESTRY

ACT10



INCH

"*Rite in the Rain*"  
ALL-WEATHER WRITING PAPER



Name OTIE

1220 KENNESTONE CIRCLE

Address MARIETTA, GA 30060

Phone 678-355-5550

Project 2005148-1314

110 PALMETTO HIGHWAY

BELTON, SC

WELCH GROUP ENVIRONMENTAL

## CONTENTS

| PAGE | REFERENCE | DATE |
|------|-----------|------|
|------|-----------|------|

Clear Vinyl Protective Slipcovers (Item No. 30) are available for this style of notebook.  
Helps protect your notebook from wear & tear. Contact your dealer or the J. L. Darling Corporation.

2/4/11

ACCORDING TO EPA OSC SCOTEC INDICATED  
ON 2/4/11 THAT ANOTHER FACILITY BELONGING  
TO MR. GLENN WELCH OPERATIONS; ACCORDING  
TO SCOTEC THE BUILDING CAUGHT FIRE  
AND WAS SHUT DOWN BY LOCAL FIRE DEPT.  
EPA OSC INDICATED WILL MAKE ARRANGEMENTS  
TO VISIT SITE

Scale: 1 square=\_\_\_\_\_

2/7/11

1430 - ARRIVE @ 110 PARK TO MEET w/  
EPA OSC/MR. WELCH, CHAIRMAN GRAY (PROPERTY  
OWNER), START

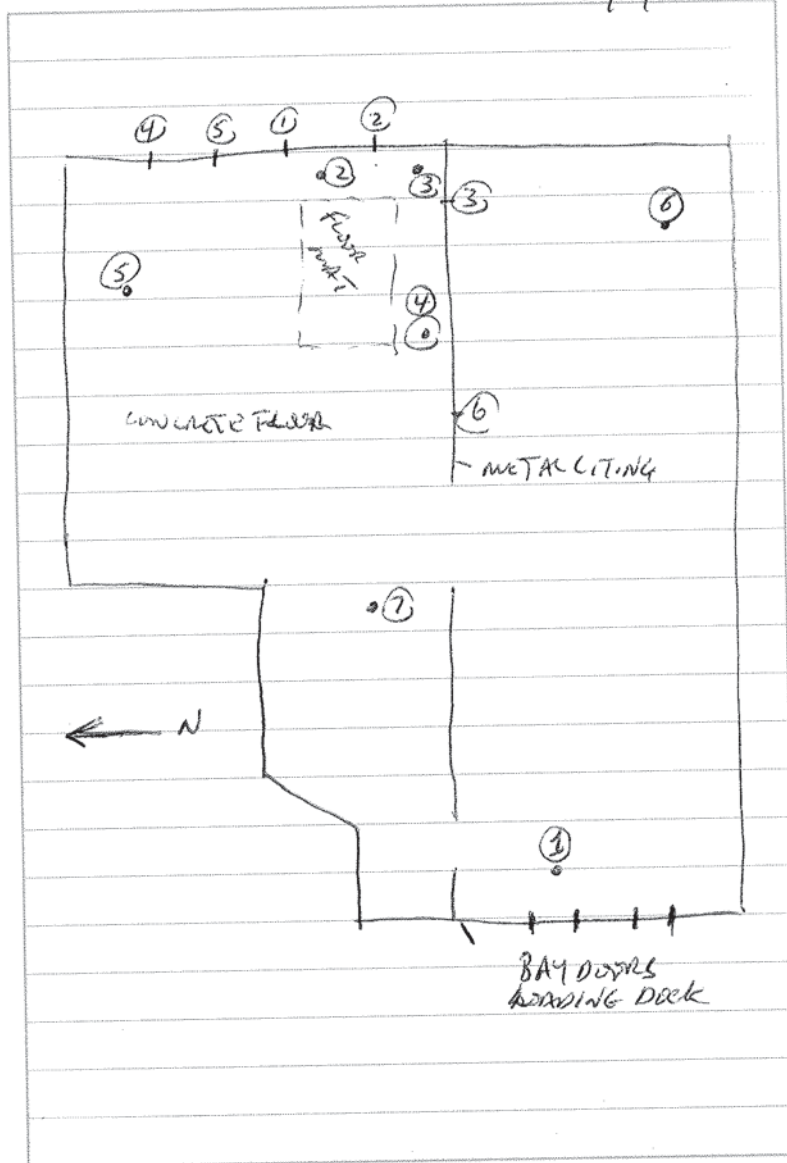
ACCORDING TO PROPERTY OWNER, MR. WELCH  
LEASED SPACE TO STORE BOXES OF RANGE POWDER  
MATERIAL; THE BUILDING IS WAREHOUSE ~~SPACE~~  
~~THAT IS LEASED~~ <sup>TO</sup> WHERE SPACE IS USED;  
<sup>TO</sup> MR. WELCH LEASES SPACE AT THIS  
LOCATION; MR. WELCH INDICATED THAT  
THERE WERE NO OPERATIONS JUST STORAGE  
ACCORDING TO MR. WELCH A LOAD OF RANGE  
MATERIAL WAS RETURNED AND ~~THE~~ PERSONNEL  
WERE USING A METAL SHovel TO PICK UP  
MATERIAL; THE METAL SHovel AGAINST THE  
CONCRETE FLOOR CREATED A SPARK THAT  
IGNITED RESIDUAL GUN POWDER FROM THE  
SPENT CASINGS CAUSING A FIRE; RESIDUAL  
GUN POWDER IS CALLED GREEN POWDER

1500 - EPA OSC REQUESTED START TO  
XRF AREAS OF THE WAREHOUSE WHERE  
MR. WELCH STORED RANGE POWDER  
MATERIAL

Scale: 1 square=\_\_\_\_\_



2/7/11



Scale: 1 square=\_\_\_\_\_

2/7/11

FLOOR

- 1) FLOOR OF LOADING DOCK - Pb - 1570 ppm  $\pm$  87 1507
- 2) FLOOR LEAD STORAGE AREA - Pb - 2060 ppm  $\pm$  85 1514
- 3) FLOOR LEAD STORAGE AREA - Pb - 3083 ppm  $\pm$  99 1519
- 4) FLOOR LEAD STORAGE AREA - Pb - 2456 ppm  $\pm$  93 1523
- 5) FLOOR LEAD STORAGE AREA - Pb - 1363 ppm  $\pm$  71 1528
- 6) FLOOR SOUTH CORNER OF BUILDING WHERE NO LEAD MATERIALS WERE STORED - Pb - 408 ppm  $\pm$  43 1534
- 7) FLOOR LEAD STORAGE AREA - Pb - 722 ppm  $\pm$  52 1540

BUILDING WALLS

- 1) BUILDING WALLS - Pb - 4630 ppm  $\pm$  451 1546
- 2) BUILDING WALLS - Pb - 5140 ppm  $\pm$  449 1550
- 3) BUILDING WALLS - Pb - 9593 ppm  $\pm$  1528 1554
- 4) BUILDING WALLS - Pb - 25740 ppm  $\pm$  1617 1559
- 5) BUILDING WALLS - Pb - 35028 ppm  $\pm$  2620 1604
- 6) BUILDING WALLS - Pb - 9412 ppm  $\pm$  1464 1609

1615 - START / END OFFSITE

Scale: 1 square=\_\_\_\_\_

2/11/11

1130 - MEETING w/ EPA, SCDHEC, MR. WOCH,  
 CUMMINS GARY/WOCH CONTRACTOR  
 THE EPA INDICATED TO MR. WOCH THAT  
 THE EPA WOULD ALLOW CLEANUP UP  
 BUILDING TO 2,200 ppm; HOWEVER  
 THE STATE ALLOW 400 ppm; IF MR. WOCH  
 WOULD TO CLEANUP TO 2200 ppm THEN THE  
 SCDHEC WOULD PLACE A DEED RESTRICTION  
 ON THE PROPERTY; MR. WOCH INDICATED HE  
 WILL CLEAN BUILDING AREA TO 400 ppm  
 EPA EXPLANATION AREA WILL HAVE TO BE  
 ZONED OFF, MAINTAINED AND EVENTUALLY  
 DEMOLISHED AND TESTED TO 400 ppm;  
 MINIMIZE H<sub>2</sub>O DURING CLEANING; SECURE  
 SITE; EPA ALLOWED WASTE GENERATION TO  
 BE MOVED TO ANDERSON FACILITY; AREA  
 OF WORK AREA APPROX 3000 SQ FT  
 MR. WOCH INDICATED NO ~~HOUSE~~ <sup>WAREHOUSE</sup> ACTIVITY ON WEEKENDS  
 1240 ALL PARTIES OFFSITE

Scale: 1 square=\_\_\_\_\_

2/15/11

Sunny 62°F

1330 - LOAN ANDERSON FACILITY FOR  
 PALMERSTO FACILITY

1400 - MET w/ ~~MR.~~ MR. WOCH CONTRACTOR (PHILIPS  
 PERMY), GARETH (IH) / MR. WOCH REGARDING  
 SOW AND THE IH TO EVALUATE ~~PPH~~ MONITORING  
 DURING CLEANUP ACTIVITIES

ITEMS TO ADDRESS:

- 1) SECURE PATH FOR OTHER PERSONNEL
- 2) SECTION AREA DEFINED HAZ ZONE
- 3) REZONAR UTILITY ON PATH FOR CONTAINMENT.

1500 - COMPLETE SITE ACTIVITIES

Scale: 1 square=\_\_\_\_\_

2/16/11

Sunny - 62°F

1115 LEAVE ANDERSON FACILITY FOR PARAMOTO SITE

1145 - TALKED W/ OPA DOL; INDICATED NEED TO CHECK INTEGRITY OF PAPER LAYED ON CONCRETE FLOOR UNTIL WORK CAN BEGIN ON CLEANING BUILDING

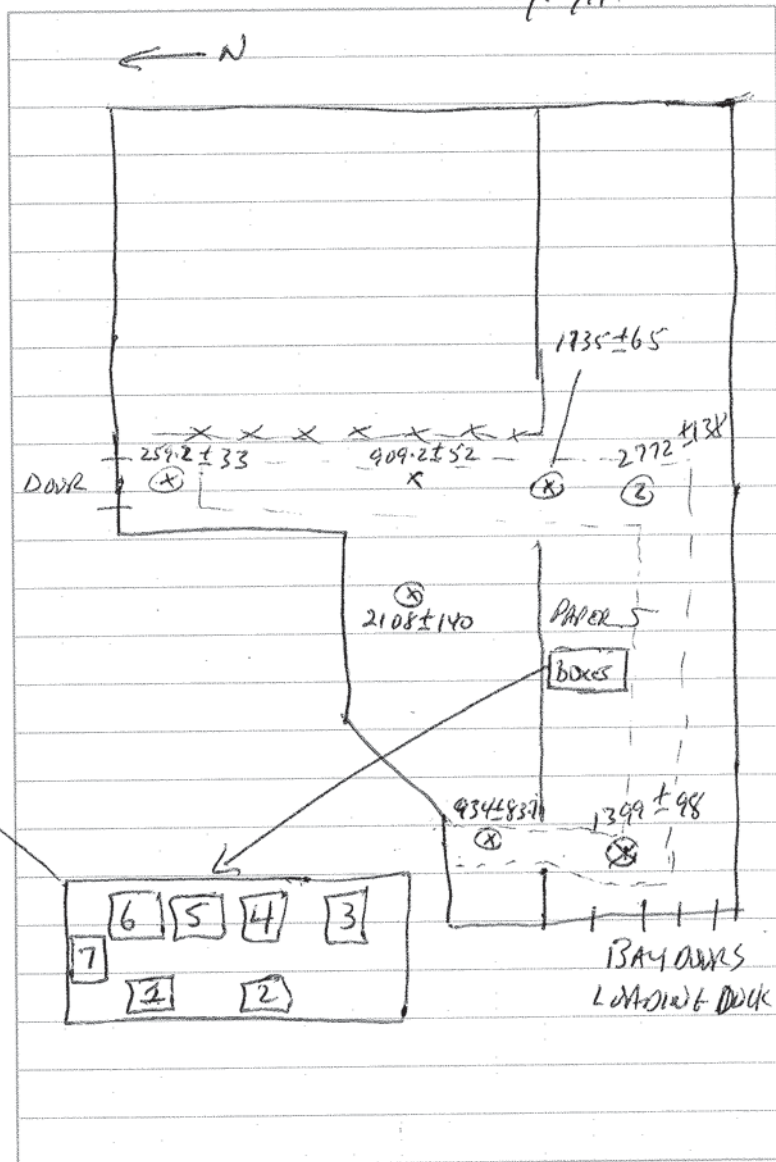
1200 - BEGIN XRF ON FLOOR AND BOXES  
SEE FIGURE FOR LOCATION

- 1)  $60.2 \pm 30.8$  - Pb - 1241 #33
- 2) ND < 57 - Pb - 1244 #34
- 3)  $55.2 \pm 25.6$  - Pb - 1248 #35
- 4) ND < 51 - Pb - 1252 #37
- 5)  $101 \pm 64.5$  - Pb - 1255 #38
- 6) ND < 69 - Pb - 1258 #39
- 7)  $138.9 \pm 45.8$  - Pb - 1301 #40

CONTRACTOR SECURED AREA W/ SECURITY FENCING TO GENERAL PERSONNEL; PAPER USED TO SECURE FLOOR FROM BASTARD ~~THROUGH~~ AROUND GRASS AROUND LOADING DOCK AND THROUGH BUILDING

Scale: 1 square = \_\_\_\_\_

2/16/11



Scale: 1 square = \_\_\_\_\_



2/16/11

START WILL MONITOR FURN ON 2/17/11  
TO DETERMINE INTEGRITY

1530 START/WGE CONTRACTOR OFFSITE

Scale: 1 square=\_\_\_\_\_

2/17/11

SUNNY 59°F

1115 - START/SCDH (PAUL WILKE) LEAVE  
AND ON W FACILITY TO CHECK CONDITION  
OF BOTTOM SIDE

1130 - ARRIVE @ BOLTON (PARAMETRO SITE)  
START SHOWED SCDH SECURITY UNARMED  
START UNARMED Q/A/QC FLOOR PAPER USED  
TO SECURE FLOOR FROM PERSONNEL

1140 - SCDH OFFSITE, START TOOK PICTURES  
OF FURN, PAPER USED TO SECURE FURN THAT  
NO BREAKS

1145 - START OFFSITE.

Scale: 1 square=\_\_\_\_\_



2/18/11

Sunny 59°F

0900 - ARRIVE @ SITE TO CHECK ON BARBIC  
 PLANT IN FURR OF WAREHOUSE; FURR SHOW  
 SIGNS OF USE; FRUIT AND BRANCHES; PICTURES  
 TAKEN

0930 - LOOKED WAREHOUSE; START OF SITE

Scale: 1 square=\_\_\_\_\_

2/21/11

Sunny 65°F / WINDY

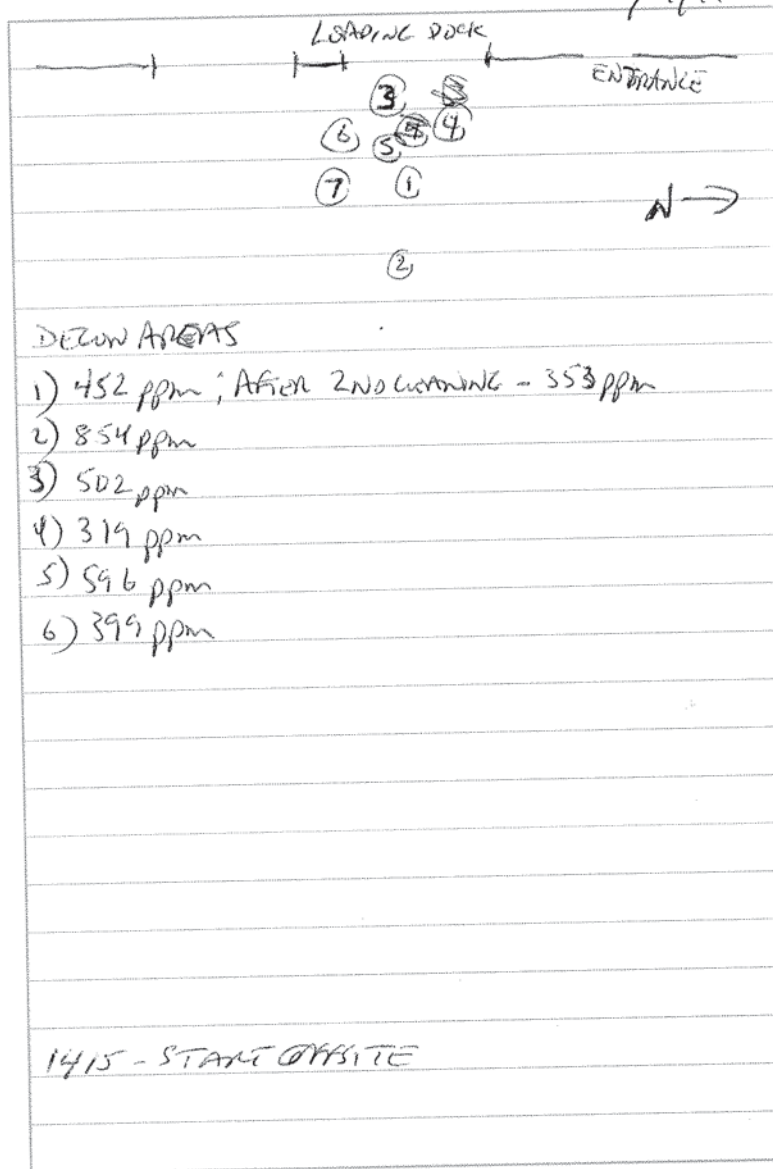
~~0900~~ 1000 - ON SITE - CONTRACTOR ON SITE

PHILIPS (POZOVAY)

1030 - CREW CLEANED AREA NEAR LOADING DOCK  
 W/ ROADING FROM 2/16/11 OF 1399 ppm; CREW WASHED  
 W/ SOAP + WATER; JACUETH THEN RINSE; AREA ALLOWED  
 TO DRY; STARTED CLEANING OF ROADING  
 452 ppm; AS SUCH A SECOND CLEANING  
 WAS DONE; SAME PROCEDURE USING VINEGAR  
 -- CREW BEGAN FRONT OF LOADING DOCK

Scale: 1 square=\_\_\_\_\_

2/21/11



Scale: 1 square=\_\_\_\_\_

2/22/11

Sunny 72°F

0200 - Arrive @ SITE

1215 - CREW BEGON WORKING ON CLEANING FLOOR.

1315 - G.W. WORK ON SITE w/ STEAM CLEANER

1404 - BEGON SCANNING FLOORING

← N

Decon Area 8

#66  
#67 X  
#68

Decon Area 10

Decon Area 9

#64 X #65 X #66 X #67 X #68 X

#61

#60

Scale: 1 square=\_\_\_\_\_

1445 - Had discussions w/ Mr. Welch based on readings; It appears a steel brush was able to remove elevated readings to below 400 ppm

1530 - OFF SITE

Scale: 1 square = \_\_\_\_\_

Overcast, 65°F

2/28/11

0900 Arrive on site. Meet with Scott to discuss operations for the day, conduct site walk. Sign H+S Plan.

0930 Calibrate PDR 1600

Cal: OK, Zeroed in bag, 0.34 mg/m<sup>3</sup> ambient reading.

Calibrate XRF

1000 Meet with Mick w/ ACT Services. XRF contractor will be on site after lunch. Areas already being decontaminated. Will chalk off 2x2 grids later today for XRF readings to be collected. Mr. Glen Welch will also be on site later today to discuss further operations with Mick.

1035 Spoke with Mick. He suggests doing decon for the day and collecting XRF data all day tomorrow, granted the XRF contractor wouldn't be here until after lunch and collecting data

Scale: 1 square = \_\_\_\_\_



2/28/11

from each 2x2 grid will take longer than they anticipated. I called the PKI to update. Mick will discuss with Glen and Leo. Hibernia Enterprises, Inc.

(678) 618-0461 - doing clean up.

1250 Newspaper dropped off at loading dock.

Clean up crew wearing Gil-Air Samplers and one Gil-Air Set up near work zone. Samples will be submitted to AES in Atlanta, GA. Any additional Samples collected will go to EMSL laboratory in New Jersey.

1300 Scott offsite to check for empty 55-gal drums at another site. Current lead waste water 55-gal drum is 1/4th full.

1310 Newspaper truck offsite.

1330 Scott returns, spoke with Leo and he approved work through tomorrow.

late note: Conducted air monitoring

Scale: 1 square=\_\_\_\_\_

2/28/11

with PDR-1000 within facility. Approximately 1.6 mg/m<sup>3</sup>.

1400 STAFF Conducted preliminary screening of the floor

#01 422.8 ppm Pb +/- 60.3

#02 38.2 ppm Pb +/- 62.0

#03 401.4 ppm Pb +/- 52.2

Crew will mop again and then chalk off.

1500 Mick offsite - leaving Marty in charge. Scott to Home Depot for Chalk.

There will be appx 90 2x2 grids so far the crew has gone through 10 mop heads and 15 gallons of waste water has been generated. The soap used is Trisodium Phosphate powder + liquid (TSP).

1700 Randy w/ Life Environmental + Tech Sherry arrive to conduct XRF screening. Screened grids have lead levels between 200 ppm and 1200 ppm.

Scale: 1 square=\_\_\_\_\_



2/28/11

Crew will attempt to scrub floors again tomorrow.

1830 Sherry and Randy off Site.

1845 Clean up crew off site.

1900 START, ACT and Scott off Site. Work will begin at 0800.

1945 START arrives at hotel in Anderson, begins POLREPs.

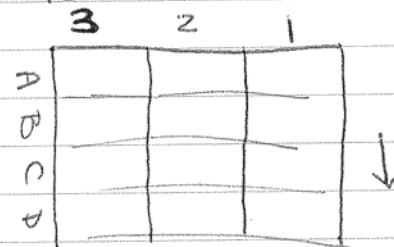
Scale: 1 square=\_\_\_\_\_

51°F Sunny

3/1/11

0800 START, ACT, clean up crew, Scott on site; discuss plan of action for the day.

Crew will focus on <sup>Columns</sup> ~~Rows~~ 1+3, as readings within column 2 were lower.



4-men clean up crew today.

0900 Marty suggest crew clean each individual square foot within a grid and to clean each brush after use.

START conducted Preliminary Screenings:

D3: 404.8 Pb ppm

E3: 365.9 Pb

F3: 684.3 Pb

Scale: 1 square=\_\_\_\_\_

3/1/11

1000 Scott leaves to purchase vinegar. 1048 returns to site. Clean up crew resumes decon efforts using vinegar. START continues to spot check sprayed locations by ACT and collecting PDR data. 1130 ACT requests START to spot check additional locations for lead. After vinegar and TSP wash, the readings are approximately 200 - 250 ppm.

1700 There are two (2) 55-gal drums of waste water on site. The clean up crew will label both drums and Scott will obtain a new drum tomorrow. The clean up crew covered the flooring with plastic.

1800 All off site  
sleep

Scale: 1 square=

39°F Sunny

3/2/11

0800 START, ACT, clean up crew and Scott on site. Scott informed START that Mr. Welch and ACT are authoring the WP for the three sites. The crew and ACT are currently chalking the grid on the floor for START to conduct lead screening. START was tasked by the OSE to fill in for the original Contractor for XRF capabilities. Scott obtained a 55-gal drum for waste water.

0900 Crew begins decon of floor on south side of facility. There are still some spots on the north side w/ lead readings above 400 ppm. Once crew applies vinegar to the south side, floor will be allowed to dry, will be gridded off with chalk and screened by START.

Scale: 1 square=



3/2/11

1530 All but eight locations on the South Side of the facility are under 400 ppm lead. Crew will clean the eight locations again. —

1700 Flooring on north side near the bathroom has higher hits for lead. START also screened the first few tiles at the north side — beyond metal plate and are also still above 400 ppm.

It was determined, due to the difference in color of the concrete in the N+S sides, there must be a sealant on the N side concrete. The crew is going to try a higher concentration of vinegar, ~~allow~~ the vinegar to sit (to dissolve metal) and scrub w/ wire brushes.

~~ALL~~

Scale: 1 square=\_\_\_\_\_

3/2/11

1900 START screened flooring on N side after flooring dried. No real significant change in readings. The crew will bring a buffer and attempt to use the grinder again on Friday 3/4/11. They will also try to obtain a Sealant remover from Home Depot. ACT cannot be on site Thursday, hence why work will resume Friday. —

2000 All off site

~~ALL~~

Scale: 1 square=\_\_\_\_\_

Cloudy, 37°F rain today 3/4/11

0800 Crew begins building a poly wall in preparation for grinder. A vent will be placed behind the grinder to remove exhaust from the work zone. START Screened a test area and reading was under 100 ppm. Crew will

Continue to extend the poly wall to avoid dust dispersal.

1300 Flooring on N Side was grinded twice to ensure no lead contamination. Crew vacuumed the area in between grinding to avoid spreading lead dust.

1400 Floor wiped with vinegar.

1430 Floor was gridded with chalk and START began screening. All locations were below 400 ppm. Approximately 50% were non-detect w/ standard deviations ~ 50 ppm. Metal plate would not come clean

Scale: 1 square=\_\_\_\_\_

3/4/11

Crew will cover the metal with poly sheeting and later dispose as hazardous material, 1100 All off site.

\*Late note: Paul will keep with SEDHEC on site 1400 to check progress of work. Said they (SEDHEC) distributed soil results to residences near Fair Play - no detections.

Scale: 1 square=\_\_\_\_\_





**Official Photograph No. 1**

|                      |   |                |                   |
|----------------------|---|----------------|-------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                   | <b>Date:</b>   | February 11, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina | <b>TDD No:</b> | TNA-05-001-0129   |
| <b>Photographer:</b> | Jerry Partap, START                     |                |                   |
| <b>Subject:</b>      | View of WGE Palmetto facility.          |                |                   |



**Official Photograph No. 2**

|                      |   |                |                  |
|----------------------|---|----------------|------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                   | <b>Date:</b>   | February 7, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina | <b>TDD No:</b> | TNA-05-001-0129  |
| <b>Photographer:</b> | Jerry Partap, START                     |                |                  |
| <b>Subject:</b>      | View of WGE Palmetto facility entrance. |                |                  |



**Official Photograph No. 3**

**Site Name:** WGE Palmetto Facility **Date:** February 7, 2011  
**Location:** Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129  
**Photographer:** Jerry Partap, START  
**Subject:** View of the loading dock where range recovered material entered the warehouse.



**Official Photograph No. 4**

**Site Name:** WGE Palmetto Facility **Date:** February 7, 2011  
**Location:** Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129  
**Photographer:** Jerry Partap, START  
**Subject:** View of the area where the range recovered material was stored.



**Official Photograph No. 5**

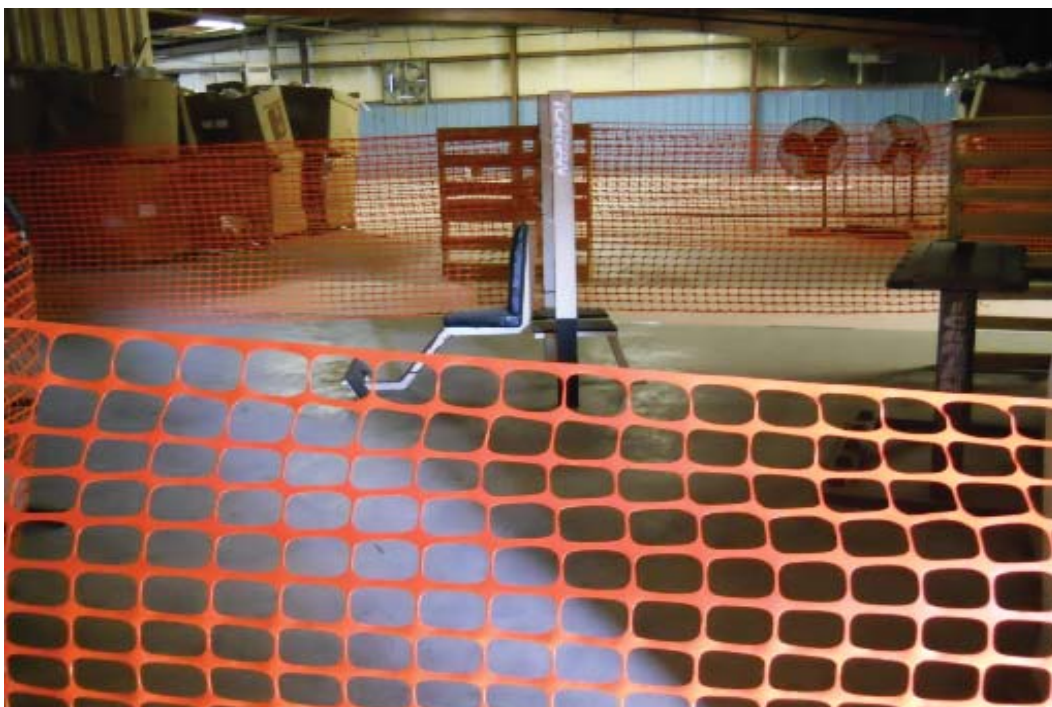
**Site Name:** WGE Palmetto Facility **Date:** February 7, 2011  
**Location:** Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129  
**Photographer:** Jerry Partap, START  
**Subject:** Ceiling area where fire scorched interior of the building.



**Official Photograph No. 6**

**Site Name:** WGE Palmetto Facility **Date:** February 16, 2011  
**Location:** Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129  
**Photographer:** Jerry Partap, START  
**Subject:** View of spent casings and bullets on the warehouse floor.





**Official Photograph No. 7**

|                      |   |                |                   |
|----------------------|---|----------------|-------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                   | <b>Date:</b>   | February 16, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina | <b>TDD No:</b> | TNA-05-001-0129   |
| <b>Photographer:</b> | Jerry Partap, START                     |                |                   |
| <b>Subject:</b>      | Area secured from warehouse personnel.  |                |                   |



**Official Photograph No. 8**

|                      |  |                |                   |
|----------------------|--|----------------|-------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                                  | <b>Date:</b>   | February 16, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina                | <b>TDD No:</b> | TNA-05-001-0129   |
| <b>Photographer:</b> | Jerry Partap, START                                    |                |                   |
| <b>Subject:</b>      | View of storage area secured from warehouse personnel. |                |                   |





**Official Photograph No. 9**

|                      |   |                |                   |
|----------------------|---|----------------|-------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                   | <b>Date:</b>   | February 17, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina | <b>TDD No:</b> | TNA-05-001-0129   |
| <b>Photographer:</b> | Jerry Partap, START                     |                |                   |
| <b>Subject:</b>      | View of secured warehouse flooring.     |                |                   |



**Official Photograph No. 10**

|                      |   |                |                   |
|----------------------|---|----------------|-------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                           | <b>Date:</b>   | February 17, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina         | <b>TDD No:</b> | TNA-05-001-0129   |
| <b>Photographer:</b> | Jerry Partap, START                             |                |                   |
| <b>Subject:</b>      | Additional areas of secured warehouse flooring. |                |                   |



**Official Photograph No. 11**

|                      |   |                |                   |
|----------------------|---|----------------|-------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                           | <b>Date:</b>   | February 17, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina         | <b>TDD No:</b> | TNA-05-001-0129   |
| <b>Photographer:</b> | Jerry Partap, START                             |                |                   |
| <b>Subject:</b>      | Additional areas of secured warehouse flooring. |                |                   |



**Official Photograph No. 12**

|                      |   |                |                   |
|----------------------|---|----------------|-------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                           | <b>Date:</b>   | February 17, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina         | <b>TDD No:</b> | TNA-05-001-0129   |
| <b>Photographer:</b> | Jerry Partap, START                             |                |                   |
| <b>Subject:</b>      | Additional areas of secured warehouse flooring. |                |                   |



**Official Photograph No. 13**

|                      |   |                |                   |
|----------------------|---|----------------|-------------------|
| <b>Site Name:</b>    | WGE Palmetto Facility                           | <b>Date:</b>   | February 17, 2011 |
| <b>Location:</b>     | Belton, Anderson County, South Carolina         | <b>TDD No:</b> | TNA-05-001-0129   |
| <b>Photographer:</b> | Jerry Partap, START                             |                |                   |
| <b>Subject:</b>      | Additional areas of secured warehouse flooring. |                |                   |

**TABLE 1**  
**WELCH GROUP ENVIRONMENTAL**  
**BELTON, ANDERSON COUNTY, SOUTH CAROLINA**  
**PILOT TEST DECONTAMINATION XRF SCREENING RESULTS**  
**FEBRUARY 21 22, 2011**

| Location      | Time     | Type     | Sample                | XRF Lead Soil Results (ppm) | +/- Error |
|---------------|----------|----------|-----------------------|-----------------------------|-----------|
| Decon Area 1  | 02/21/11 | Concrete | Loading Dock          | 452                         | 45        |
| Decon Area 1  | 02/21/11 | Concrete | Loading Dock          | 353                         | 38        |
| Decon Area 2  | 02/21/11 | Concrete | Loading Dock          | 854                         | 55        |
| Decon Area 2  | 02/22/11 | Concrete | Test Using Wire Brush | 268                         | 44        |
| Decon Area 3  | 02/21/11 | Concrete | Loading Dock          | 502                         | 48        |
| Decon Area 3  | 02/22/11 | Concrete | Test Using Wire Brush | 255                         | 35        |
| Decon Area 4  | 02/21/11 | Concrete | Loading Dock          | 319                         | 47        |
| Decon Area 5  | 02/21/11 | Concrete | Loading Dock          | 596                         | 57        |
| Decon Area 6  | 02/21/11 | Concrete | Loading Dock          | 399                         | 46        |
| Decon Area 7  | 02/22/11 | Concrete | After Second Cleaning | 2240                        | 85        |
| Decon Area 7  | 02/22/11 | Concrete | Test Using Wire Brush | 140                         | 37        |
| Decon Area 8  | 02/22/11 | Concrete | After Second Cleaning | 1982                        | 116       |
| Decon Area 8  | 02/22/11 | Concrete | After Third Cleaning  | 1065                        | 70        |
| Decon Area 8  | 02/22/11 | Concrete | Test Using Wire Brush | 412                         | 46        |
| Decon Area 9  | 02/22/11 | Concrete | After Second Cleaning | 569                         | 50        |
| Decon Area 10 | 02/22/11 | Concrete | After Second Cleaning | 499                         | 58        |

Notes:

ppm – parts per million

XRF – X-ray Fluorescence elemental detector

Results that are shaded are above the USEPA Removal Action Level for lead in residential soil (400 ppm).





To: Leo Francendese EPAOSC

From: Glenn Welch WGE President

Date: February 23, 2011

Subj: Requested Amendment to the REMOVAL ACTIONS WORK PLAN  
WGE Palmetto Parkway Site Belton, SC

As discussed today via the phone, we request the following changes to the current RAWP (the current RAWP can be found at this link  
<http://www.epaosc.org/sites/6682/files/WelchGroup%20PalmettoHwy%20SOW%2002132011.pdf>):

1. In the interest of reducing the immediate size of the affected area, we would like to address the area in and around the loading dock first. Please see referenced maplink:  
(<http://www.epaosc.org/sites/6682/files/WelchGroupPalmettoHwy%20internal%20map%20and%20Ogrid.pdf>.)
  2. Our pilot tests indicated that dry removal may not be adequate and that an additional method of wet cleaning (re. misting) may be required to complete the work. Additional use of a vacuum will be considered as the work progresses in order to minimize dust and maximize operational efficiency. All wastestreams will be handled in accordance with RCRA disposal requirements and all equipment will be properly deconned as per the HASP. In addition, we appreciate the opportunity to temporarily store the drummed waste at the WGE Belton Site as it awaits future disposal.
  3. When the final stage of cleanup is complete, the area will be tested with an XRF analyzer to ensure lead levels are brought down to acceptable levels (less than 400 ppm). This will be accomplished by taking one reading in an area 2 feet by 2 feet, or taking a 5 point composite reading in a 5 foot by 5 foot area.
- We understand that quality control will be conducted by your contractor using their XRF equipment as necessary to confirm attainment.
4. We plan to conduct this action on February 28th of 2011 and expect completion by the end of the day on the 28<sup>th</sup>.

Welch Group Environmental  
118 White Oak Road  
Belton, SC 29627

All work will be done in accordance with the approved Health and Safety Plan for the WGE Palmetto Pkwy Site which can be found here:

<http://www.epaosc.org/sites/6682/files/WGE%20H&S%20PALMETTO%20Site%20Rev.pdf>

All work will be followed by a Daily Progress Report (DPR) which will be submitted at the end of the business day for that period of operations.

\*\*\*\*\*MEMO\*\*\*\*\* The new contractor we will be using for this Work Plan is: A.C.T. Services located at 783 North Clayton Street in Lawrenceville, GA 30045. The Point of Contact is: Mick Robarts at (404) 391-9460.

Regards,

Glenn E. Welch

Welch Group Environmental  
118 White Oak Road  
Belton, SC 29627



June 29, 2012

Mr. Leo Francendese  
On-Scene Coordinator (OSC)  
U.S. Environmental Protection Agency  
61 Forsyth Street, SW 11<sup>th</sup> Floor  
Atlanta, Georgia 30303

**Subject: Removal Site Inspection, Revision 0**  
**Welch Group Environmental (WGE) Palmetto Parkway Site**  
**110 Palmetto Parkway, Belton, South Carolina**  
**EPA Contract No. EP-W-05-053**  
**Technical Direction Document (TDD) No. TNA-05-001-0129**

Dear Mr. Francendese:

The Oneida Total Integrated Enterprises (OTIE) Superfund Technical Assessment and Response Team (START) have prepared this Incident Response Letter Report detailing activities conducted in support of the On Scene Coordinator (OSC) for the U.S. Environmental Protection Agency (EPA). The initial scope of this activity was to conduct field investigation activities at the Welch Group Environmental (WGE) Palmetto Parkway site (site) in support of a removal site inspection that was part of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal site evaluation (RSE). The OSC directed WGE to conduct an emergency response action at the site thus expanding START's support role. WGE is a metal recovery company that recovered lead slugs and shell casings from gun/rifle ranges until it ceased operations in December 2010 at the request of the South Carolina Department of Health and Environmental Control (SCDHEC). The site is part of WGE's operations and was serving as storage.

START was specifically tasked to prepare a Health and Safety Plan; provide equipment including an X-Ray Fluorescence (XRF) instrument, and personnel to conduct inspection and support activities; document START and Responsible Party (RP)-lead response action site activities with photographs and written logbook notes; maintain the OSC webpage ([EPA OSC Webpage](#)) and prepare an Incident Response Letter Report summarizing the inspection and emergency response action activities. Attachment A of this Letter Report includes a topographical map ([Figure 1](#)), a site aerial photograph

([Figure 2](#)) and XRF screening location maps ([Figure 3](#)) and ([Figure 4](#)), respectively. The XRF decontamination test results are presented in Table 1 provided in Attachment B ([Pilot Test Data](#)). A photographic log of site activities is provided as Attachment C ([Photolog](#)) and a copy of the logbook notes are provided as Attachment D ([EPA Field Notes](#)).

### **Physical Location**

The site is located at 110 Palmetto Parkway in Belton, Anderson County, South Carolina. The geographic coordinates for the center of the property are Latitude 34.5228881° North and Longitude - 82.4942948° West ([Figure 1](#)). The site is comprised of a one-story warehouse building where WGE stored recovered lead slugs and shell casings from gun/rifle ranges. Several different clients lease space within the multi-use warehouse, but the building is not partitioned into individual units. Residential properties are located to the east, west, and south of the warehouse building. A large one-story warehouse building bounds the site to the north. ([Figure 2](#)) located in Attachment A show the location of the site and the surrounding areas.

### **Site Background**

This site is part of the WGE CERCLA response. SCDHEC notified EPA of the site while EPA was conducting Removal Site Evaluations (RSE) at two other WGE facilities located in Fair Play ([Fair Play Facility](#)) and Belton ([Belton Facility Webpage](#)), South Carolina. The WGE Palmetto Parkway site was part of WGE's operations and served as warehouse storage.

On February 7, 2011, EPA, START, property owner Cummings Gary, and site operator WGE conducted a site walk. During the site walk, WGE indicated that a box of range recovered material had overturned during cleanup and a metal shovel was used to recover the spilled material ([Access Agreement](#)). During recovery, the metal shovel scraped against the residual gun powder (green powder) covered concrete floor creating a spark. The ensuing fire partially damaged the building leaving burnt insulation and roofing material.

### **Field Investigation Activities and Results**

During the February 7, 2011 site walk, the EPA OSC tasked START to use an XRF to conduct in situ screening for metal concentrations at select locations of the building. START screened the floor and walls of areas where most site operation activities took place. WGE operations occupied approximately



4,000 square feet (ft<sup>2</sup>) of warehouse space. XRF readings for lead ranged from 408 parts per million (ppm) on the warehouse floor to 35,000 ppm along the building walls. Figure 3, provided in Attachment A, shows the building layout and the XRF lead readings ([Figure 3](#)).

Based on the XRF lead screening results, the EPA OSC determined that a release or substantial threat of release of a hazardous substance to the environment had occurred. The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare ([Pol/Sitrep #1](#)).

On February 10, 2011, a Notice of Federal Interest (NOFI) was issued to the site owner, Mr. Cummings Gary ([NOFI](#)). The OSC directed the site operator, WGE, to remediate the contaminated section of the warehouse. WGE's immediate goal was securing the facility from other facility personnel.

#### **RP-Lead RA Actions**

On February 17, 2011, WGE contractor was on site to cover the concrete flooring in designated areas with an industrial paper until remediation activities could occur. Safety barricades were used to delineate the exclusion zone (area where WGE stored the range recovered material) to prevent non response-related personnel from entering. WGE contractor submitted a Pilot Test Work Plan proposing decontamination of approximately 1,400 ft<sup>2</sup> of the warehouse floor to determine contaminant reduction concentrations below the EPA regional screening levels (RSL) of 400 ppm ([Approved Work Plan](#)).

On February 21 and 22, 2011, Phillips was on site to conduct the decontamination Pilot Test. Pilot testing was performed in a small area of the warehouse floor near the loading docks. Initial XRF readings for lead near the loading docks ranged from 1,399 to 1,570 ppm (Figure 3). The concrete near the loading docks was smooth in some areas and pitted and showing signs of deterioration in others. A detergent solution and water was used to clean the small area. The area was then rinsed with minimal water, vacuumed, and allowed to dry before confirmation screening using the XRF. A steel wire brush was used by WGE contractors in several areas to determine its effectiveness. Table 1, provided in Attachment B, presents the results of the February 21 and 22, 2011 Pilot Test XRF readings ([Pilot Test Data](#)). Figure 4, provided in Attachment A, shows the locations of the decontaminated areas ([XRF Readings](#)).

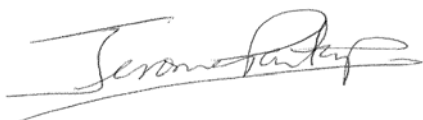
On February 28, 2011 through March 2, 2011, START observed WGE contractors continue with the decontamination Pilot testing activities ([Revised RAWP](#)). WGE contractors monitored air particulates while cleaning activities were being conducted ([Air Monitoring Data](#)). There were sections of the warehouse pathway where concentrations were still above 400 ppm. WGE contractors used a tavasco grinder on the floor and vacuumed dust with a high efficiency particulate air vacuum. The areas of the previously covered pathway were screened and readings were below 400 ppm.

#### **Planned RP-Lead RA Activities**

EPA tasked WGE with developing a Work Plan for remediating the remaining surface areas of concern in the warehouse while maintaining security to unqualified personnel for the area. WGE will submit the Work Plan to the EPA OSC for approval and it will be incorporated into an upcoming time critical removal action under an Administrative Order on Consent (AOC). Any further activities will be at the direction of the EPA OSC.

If you have any questions or comments regarding this letter report or require any additional information, please contact myself or Mr. Russell Henderson, START Assistant Program Manager, at 678-355-5550.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Partap", with a horizontal line drawn underneath the signature.

Jerry Partap  
START Project Manager

CC: Katrina Jones, EPA Project Officer  
Darryl Walker, EPA Project Officer (w/o enclosure)  
Greg Kowalski, START Program Manager  
Russell Henderson, START Assistant Program Manager  
START File

Enclosures

**ATTACHMENT A**  
**FIGURES**

**ATTACHMENT B**  
**TABLES**



**ATTACHMENT C**  
**PHOTOGRAPHIC LOG**

**ATTACHMENT D**  
**LOGBOOK NOTES**

**Welch Group Environmental  
Palmetto Facility  
XRF Lead Readings**

| Date/Time      | Sample ID | Pb     | Pb Error |
|----------------|-----------|--------|----------|
| 3/4/2011 17:30 | A1        | < LOD  | 57.33    |
| 3/4/2011 17:29 | A2        | < LOD  | 59.94    |
| 3/4/2011 17:28 | A3        | 78.65  | 44.29    |
| 3/4/2011 17:26 | B1        | < LOD  | 56.11    |
| 3/4/2011 17:25 | B2        | < LOD  | 50.59    |
| 3/4/2011 17:24 | B3        | < LOD  | 54.13    |
| 3/4/2011 17:23 | C1        | < LOD  | 57.21    |
| 3/4/2011 17:22 | C2        | 93.93  | 46.95    |
| 3/4/2011 17:21 | C3        | < LOD  | 54.29    |
| 3/4/2011 17:20 | D1        | 88.86  | 45.22    |
| 3/4/2011 17:19 | D2        | 88.76  | 41.99    |
| 3/4/2011 17:18 | D3        | < LOD  | 60.06    |
| 3/4/2011 17:17 | E1        | < LOD  | 57.74    |
| 3/4/2011 17:15 | E2        | 162.84 | 49.31    |
| 3/4/2011 17:14 | E3        | 336.96 | 64.4     |
| 3/4/2011 17:13 | F1        | 73.99  | 42.74    |
| 3/4/2011 17:11 | F2        | 79.04  | 43.02    |
| 3/4/2011 17:10 | F3        | 91.28  | 40.71    |
| 3/4/2011 17:08 | G1        | 76.98  | 42.9     |
| 3/4/2011 17:06 | G2        | 159.59 | 51.72    |
| 3/4/2011 17:05 | G3        | 71.57  | 43.5     |
| 3/4/2011 17:04 | H1        | 195.39 | 56.52    |
| 3/4/2011 17:03 | H2        | 72.92  | 43.55    |
| 3/4/2011 17:02 | H3        | 66.13  | 41.22    |
| 3/4/2011 16:58 | I1        | 178.05 | 55.3     |
| 3/4/2011 16:59 | I2        | 257.5  | 62.61    |
| 3/4/2011 17:00 | I3        | 153.3  | 54.54    |
| 3/4/2011 16:54 | J1        | 176.22 | 57.53    |
| 3/4/2011 16:56 | J2        | 76.21  | 42.65    |
| 3/4/2011 16:57 | J3        | 230.54 | 62.36    |

**Welch Group Environmental  
Palmetto Facility  
XRF Lead Readings**

| Date/Time      | Sample ID | Pb     | Pb Error |
|----------------|-----------|--------|----------|
| 3/2/2011 18:46 | J16       | 292.64 | 69.83    |
| 3/2/2011 18:47 | J17       | < LOD  | 51.76    |
| 3/2/2011 21:01 | J18       | 393.59 | 75.37    |
| 3/4/2011 16:53 | K1        | < LOD  | 49.93    |
| 3/4/2011 16:52 | K2        | 66.05  | 41.97    |
| 3/4/2011 16:51 | K3        | 123.53 | 47.53    |
| 3/2/2011 18:41 | K16       | 308.57 | 69.06    |
| 3/2/2011 20:59 | K17       | 248.6  | 60.34    |
| 3/2/2011 18:45 | K18       | 226.97 | 62.45    |
| 3/4/2011 16:50 | L1        | 81.61  | 43.6     |
| 3/4/2011 16:48 | L2        | 120.23 | 50.07    |
| 3/2/2011 19:06 | L3        | 358.95 | 67.71    |
| 3/2/2011 18:38 | L16       | 296.59 | 68.57    |
| 3/2/2011 18:39 | L17       | 233.21 | 64.16    |
| 3/2/2011 18:40 | L18       | 127.47 | 53.47    |
| 3/4/2011 16:46 | M1        | 89.3   | 43.95    |
| 3/4/2011 16:45 | M2        | < LOD  | 60.08    |
| 3/4/2011 16:44 | M3        | 76.77  | 44.09    |
| 3/2/2011 18:35 | M16       | 210.81 | 60.88    |
| 3/2/2011 18:36 | M17       | 148.64 | 56.11    |
| 3/4/2011 16:43 | N1        | 65.85  | 38.11    |
| 3/4/2011 16:37 | N2        | 87.44  | 43.44    |
| 3/4/2011 16:36 | N3        | < LOD  | 57.89    |
| 3/2/2011 18:28 | N16       | 279.78 | 66.53    |
| 3/2/2011 18:33 | N17       | 173.45 | 40.14    |
| 3/4/2011 16:35 | O1        | 95.98  | 48.22    |
| 3/4/2011 16:34 | O2        | 98.16  | 46.1     |
| 3/4/2011 16:33 | O3        | < LOD  | 60.39    |
| 3/2/2011 20:56 | O16       | 186.15 | 55.61    |
| 3/4/2011 16:29 | O17       | 357.18 | 71.6     |



**Welch Group Environmental  
Palmetto Facility  
XRF Lead Readings**

| Date/Time      | Sample ID | Pb      | Pb Error |
|----------------|-----------|---------|----------|
| 3/4/2011 16:41 | P1*       | 1555.18 | 824.68   |
| 3/4/2011 16:38 | P2*       | < LOD   | 492.4    |
| 3/2/2011 18:54 | P3*       | 342.27  | 148.11   |
| 3/2/2011 21:29 | P16       | 388.11  | 74.48    |
| 3/2/2011 20:54 | P17       | 346.31  | 79.9     |
| 3/2/2011 10:48 | Q1        | 357.38  | 75.46    |
| 3/2/2011 10:50 | Q2        | 199.6   | 61.37    |
| 3/2/2011 10:51 | Q3        | 218.77  | 64.15    |
| 3/2/2011 18:08 | Q16       | 128.7   | 55.08    |
| 3/2/2011 18:19 | Q17       | 125.6   | 52.56    |
| 3/2/2011 10:52 | R1        | 209.68  | 60.88    |
| 3/2/2011 10:55 | R2        | 372.54  | 75.37    |
| 3/2/2011 10:57 | R3        | 166.94  | 59.19    |
| 3/2/2011 17:53 | R13       | 91.12   | 47.95    |
| 3/2/2011 17:52 | R14       | 172.79  | 57.27    |
| 3/2/2011 17:49 | R15       | 146.67  | 57.77    |
| 3/2/2011 18:04 | R16       | 163.43  | 58.19    |
| 3/2/2011 18:05 | R17       | 219.06  | 64.23    |
| 3/2/2011 18:07 | R18       | 149.67  | 54.89    |
| 3/2/2011 10:58 | S1        | 81.29   | 48.54    |
| 3/2/2011 11:00 | S2        | 117.4   | 50.5     |
| 3/2/2011 11:01 | S3        | 205.23  | 61.8     |
| 3/2/2011 17:48 | S13       | 131.36  | 54.97    |
| 3/2/2011 17:47 | S14       | 156.92  | 60       |
| 3/2/2011 17:46 | S15       | 140.45  | 57.6     |
| 3/2/2011 18:00 | S16       | 178.69  | 48.29    |
| 3/2/2011 18:02 | S17       | 132.79  | 56.26    |
| 3/2/2011 18:03 | S18       | 265.73  | 70.8     |
| 3/2/2011 11:02 | T1        | 67.72   | 42.16    |
| 3/2/2011 11:04 | T2        | 78.71   | 43.22    |

**Welch Group Environmental  
Palmetto Facility  
XRF Lead Readings**

| Date/Time      | Sample ID | Pb     | Pb Error |
|----------------|-----------|--------|----------|
| 3/2/2011 11:05 | T3        | 122.54 | 51.23    |
| 3/2/2011 17:44 | T11       | 107.98 | 46.35    |
| 3/2/2011 17:43 | T12       | 160.15 | 55.48    |
| 3/2/2011 17:42 | T13       | 191.68 | 61.2     |
| 3/2/2011 17:39 | T14       | 266.87 | 86.49    |
| 3/2/2011 17:39 | T15       | 242.1  | 65.5     |
| 3/2/2011 11:07 | U1        | < LOD  | 60.53    |
| 3/2/2011 11:09 | U2        | 89.77  | 47.55    |
| 3/2/2011 11:10 | U3        | 183.5  | 66.07    |
| 3/2/2011 17:37 | U11       | < LOD  | 68.36    |
| 3/2/2011 17:36 | U12       | 88.51  | 50.08    |
| 3/2/2011 17:35 | U13       | 250.1  | 64.19    |
| 3/2/2011 17:34 | U14       | 248.2  | 66.5     |
| 3/2/2011 17:33 | U15       | 150.5  | 52.9     |
| 3/2/2011 11:12 | V1        | 212.19 | 62.52    |
| 3/2/2011 11:13 | V2        | 301.93 | 69.86    |
| 3/2/2011 11:15 | V3        | 146.04 | 51.17    |
| 3/2/2011 17:31 | V11       | 104.66 | 47.95    |
| 3/2/2011 17:30 | V12       | 157.63 | 56.02    |
| 3/2/2011 17:29 | V13       | 132.68 | 53.28    |
| 3/2/2011 17:28 | V14       | 98.25  | 47.85    |
| 3/2/2011 17:26 | V15       | 102.34 | 48.31    |
| 3/2/2011 11:16 | W1        | 83.27  | 46.55    |
| 3/2/2011 11:17 | W2        | 93.14  | 45.4     |
| 3/2/2011 11:19 | W3        | 131.12 | 52.51    |
| 3/2/2011 17:25 | W11       | 72.83  | 42.69    |
| 3/2/2011 17:24 | W12       | 209.11 | 62.32    |
| 3/2/2011 17:22 | W13       | 77.38  | 46.4     |
| 3/2/2011 17:21 | W14       | 122.73 | 53.97    |
| 3/2/2011 17:20 | W15       | < LOD  | 60       |

**Welch Group Environmental  
Palmetto Facility  
XRF Lead Readings**

| Date/Time      | Sample ID | Pb     | Pb Error |
|----------------|-----------|--------|----------|
| 3/2/2011 11:20 | X1        | 276.01 | 67.51    |
| 3/2/2011 11:22 | X2        | 166.13 | 55.58    |
| 3/2/2011 11:23 | X3        | 87.85  | 44.82    |
| 3/2/2011 17:18 | X11       | 101.22 | 45.86    |
| 3/2/2011 17:17 | X12       | 119.31 | 49.97    |
| 3/2/2011 17:15 | X13       | 170.52 | 52.73    |
| 3/2/2011 17:14 | X14       | 187.39 | 56.44    |
| 3/2/2011 17:09 | X15       | 145.94 | 55       |
| 3/2/2011 11:25 | Y1        | 123.5  | 49.04    |
| 3/2/2011 11:26 | Y2        | 74.85  | 43.02    |
| 3/2/2011 11:27 | Y3        | 72.52  | 45.54    |
| 3/2/2011 17:55 | Y11       | 147.02 | 52.72    |
| 3/2/2011 17:08 | Y12       | 299.85 | 72.68    |
| 3/2/2011 17:07 | Y13       | 293.43 | 75.45    |
| 3/2/2011 17:06 | Y14       | 197.05 | 62.42    |
| 3/2/2011 17:04 | Y15       | 203.53 | 60.01    |
| 3/2/2011 12:08 | Z1        | 118.42 | 48.42    |
| 3/2/2011 12:10 | Z2        | 99.77  | 47.48    |
| 3/2/2011 12:11 | Z3        | 387.84 | 76.46    |
| 3/2/2011 12:12 | Z4        | 142.69 | 52.53    |
| 3/2/2011 12:43 | Z5        | 72.69  | 44.14    |
| 3/2/2011 12:50 | Z6        | 71.28  | 40.01    |
| 3/2/2011 12:57 | Z7        | 88.52  | 45.06    |
| 3/2/2011 13:04 | Z8        | 88.71  | 44.67    |
| 3/2/2011 13:10 | Z9        | 66.72  | 39.5     |
| 3/2/2011 15:08 | Z10       | 137.2  | 50.64    |
| 3/2/2011 15:14 | Z11       | 74.44  | 41.88    |
| 3/2/2011 15:21 | Z12       | 167.49 | 54.02    |
| 3/2/2011 15:28 | Z13       | 95.32  | 44.23    |
| 3/2/2011 15:35 | Z14       | 193.13 | 60.01    |

**Welch Group Environmental  
Palmetto Facility  
XRF Lead Readings**

| Date/Time      | Sample ID | Pb     | Pb Error |
|----------------|-----------|--------|----------|
| 3/2/2011 15:41 | Z15       | 162.93 | 54.29    |
| 3/2/2011 15:50 | Z16       | 169.28 | 55.63    |
| 3/2/2011 15:57 | Z17       | 229.09 | 61.82    |
| 3/2/2011 16:04 | Z18       | 171.74 | 53.16    |
| 3/2/2011 16:13 | Z19       | 214.32 | 60.42    |
| 3/2/2011 12:14 | AA1       | 147.15 | 50.99    |
| 3/2/2011 12:15 | AA2       | 275.95 | 72.91    |
| 3/2/2011 12:17 | AA3       | 201.9  | 59.03    |
| 3/2/2011 12:35 | AA4       | 211.54 | 60.08    |
| 3/2/2011 12:41 | AA5       | 117.37 | 47.35    |
| 3/2/2011 12:48 | AA6       | 144.15 | 51.05    |
| 3/2/2011 12:55 | AA7       | 77.24  | 42.98    |
| 3/2/2011 13:03 | AA8       | 179.57 | 54.89    |
| 3/2/2011 13:09 | AA9       | 102.79 | 42.45    |
| 3/2/2011 15:07 | AA10      | 109.05 | 46.94    |
| 3/2/2011 15:13 | AA11      | < LOD  | 53.68    |
| 3/2/2011 15:19 | AA12      | 129.38 | 53.29    |
| 3/2/2011 15:27 | AA13      | 140.89 | 52.05    |
| 3/2/2011 15:33 | AA14      | 130.21 | 53.08    |
| 3/2/2011 15:40 | AA15      | 159.33 | 56.74    |
| 3/2/2011 15:49 | AA16      | 76     | 41.98    |
| 3/2/2011 15:56 | AA17      | 78.16  | 43.39    |
| 3/2/2011 16:03 | AA18      | 199.96 | 57.52    |
| 3/2/2011 16:11 | AA19      | 146.35 | 53.53    |
| 3/2/2011 12:18 | BB1       | 112.06 | 48.11    |
| 3/2/2011 12:20 | BB2       | 177.6  | 57.32    |
| 3/2/2011 12:21 | BB3       | 178.93 | 53.29    |
| 3/2/2011 12:33 | BB4       | 117.29 | 49.55    |
| 3/2/2011 12:40 | BB5       | < LOD  | 61.06    |
| 3/2/2011 12:47 | BB6       | 84.35  | 46.2     |



**Welch Group Environmental  
Palmetto Facility  
XRF Lead Readings**

| Date/Time      | Sample ID | Pb     | Pb Error |
|----------------|-----------|--------|----------|
| 3/2/2011 12:54 | BB7       | 76.21  | 42.75    |
| 3/2/2011 13:01 | BB8       | < LOD  | 62.07    |
| 3/2/2011 13:08 | BB9       | 93.67  | 46.71    |
| 3/2/2011 15:06 | BB10      | 98.07  | 48.19    |
| 3/2/2011 15:12 | BB11      | < LOD  | 55.42    |
| 3/2/2011 15:18 | BB12      | 248.69 | 66.89    |
| 3/2/2011 15:25 | BB13      | 93.1   | 49.14    |
| 3/2/2011 15:32 | BB14      | 100.08 | 46.1     |
| 3/2/2011 15:39 | BB15      | 84.89  | 43.98    |
| 3/2/2011 15:47 | BB16      | 153.34 | 55.89    |
| 3/2/2011 15:54 | BB17      | 196.11 | 58.48    |
| 3/2/2011 16:02 | BB18      | 220.99 | 63.6     |
| 3/2/2011 16:10 | BB19      | 515.57 | 89.48    |
| 3/2/2011 12:23 | CC1       | 172.6  | 53.64    |
| 3/2/2011 12:24 | CC2       | 91.9   | 45.79    |
| 3/2/2011 12:25 | CC3       | 168.07 | 53.76    |
| 3/2/2011 12:32 | CC4       | 136.34 | 50.87    |
| 3/2/2011 12:39 | CC5       | 113.84 | 47.92    |
| 3/2/2011 12:46 | CC6       | 332.81 | 74.7     |
| 3/2/2011 12:52 | CC7       | 195.91 | 56.98    |
| 3/2/2011 13:00 | CC8       | 111.17 | 50.04    |
| 3/2/2011 13:07 | CC9       | 195.18 | 60.6     |
| 3/2/2011 15:05 | CC10      | 141.98 | 55.68    |
| 3/2/2011 15:11 | CC11      | 237.3  | 63.11    |
| 3/2/2011 15:17 | CC12      | 178.92 | 66.18    |
| 3/2/2011 15:24 | CC13      | 147.32 | 54.52    |
| 3/2/2011 15:31 | CC14      | 77.8   | 43.83    |
| 3/2/2011 15:37 | CC15      | 121    | 50.63    |
| 3/2/2011 15:46 | CC16      | 246    | 66.69    |
| 3/2/2011 15:53 | CC17      | 232.48 | 63.1     |

**Welch Group Environmental  
Palmetto Facility  
XRF Lead Readings**

| Date/Time      | Sample ID | Pb     | Pb Error |
|----------------|-----------|--------|----------|
| 3/2/2011 16:00 | CC18      | 291.35 | 75.22    |
| 3/2/2011 16:07 | CC19      | 271.44 | 72.81    |
| 3/2/2011 12:27 | DD1       | 248.47 | 63.73    |
| 3/2/2011 12:28 | DD2       | 279.74 | 68.18    |
| 3/2/2011 12:29 | DD3       | 303    | 68.82    |
| 3/2/2011 12:31 | DD4       | 108.01 | 47.45    |
| 3/2/2011 12:37 | DD5       | 162.48 | 50.16    |
| 3/2/2011 12:44 | DD6       | 241.86 | 59.18    |
| 3/2/2011 12:51 | DD7       | 226.74 | 61.02    |
| 3/2/2011 12:59 | DD8       | 194.9  | 59.29    |
| 3/2/2011 13:06 | DD9       | < LOD  | 63.06    |
| 3/2/2011 15:04 | DD10      | < LOD  | 59.28    |
| 3/2/2011 15:10 | DD11      | < LOD  | 59.28    |
| 3/2/2011 15:16 | DD12      | < LOD  | 66.27    |
| 3/2/2011 15:22 | DD13      | 102.53 | 48.4     |
| 3/2/2011 15:29 | DD14      | 86.25  | 43.68    |
| 3/2/2011 15:36 | DD15      | 211.81 | 60.06    |
| 3/2/2011 15:45 | DD16      | < LOD  | 62.38    |
| 3/2/2011 15:52 | DD17      | 171.14 | 56.72    |
| 3/2/2011 15:58 | DD18      | 189    | 56.77    |
| 3/2/2011 16:06 | DD19      | 166.99 | 55.97    |

Notes: Asterisk (\*) denotes metal plating at the sample location.  
The metal plating was covered for later removal.

**Jerome Partap**

---

**From:** Francendese.Leo@epamail.epa.gov  
**Sent:** Saturday, March 19, 2011 2:32 PM  
**To:** Scott Shaw; Jerome Partap; Amanda Miolen; Glenn Welch; Glenn Welch; Chris McCluskey; Matthew Huyser  
**Subject:** Re: Proposed schedule

The work is approved w the assumption that the HASP for both locations will be followed. Please continue to send daily DPRs for each location.

I will be attempting to reduce the frequency of my oversight contractor with the intention of reducing the eventual costs to WGE. Jerry will be there this week for a max of 3 days.

Your ability to communicate and document HASP compliance and work performed will be critical to helping me reduce your costs.

Make sure to include Chris M above in your DPR emails. Its essential that SCDHEC is kept in the communications loop.

Also include Matt H as my backup.

If

---

**From:** Scott Shaw [welchgroupsafety@gmail.com]  
**Sent:** 03/19/2011 01:53 PM AST  
**To:** Leo Francendese; "Jerry Partap <">; Amanda Miolen <amiolen@otie.com>; Glenn <welchgroup@gmail.com>; Kasey <welchgroupenvironmental@gmail.com>  
**Subject:** Proposed schedule

Leo,

Here is the proposed schedule for the week of 21 March 2011. Monday and Tuesday we will be at the Fairplay site to decontaminate the excavator, if all is successful we will the move to the Palmetto Parkway site to finish out the week. If we happen to complete the decontamination of the excavator on Monday then we will move to Palmetto on Tuesday.

Regards,  
 Scott

--

**Scott A. Shaw (Safety Coordinator)**  
**(864)462-0405**

**Welch Group Environmental**  
**118 White Oak Rd.**  
**Belton, SC 29627**

3/19/2011

# EMSL Analytical, Inc.

<http://www.emsl.com>

3 Cooper St.  
Westmont, NJ 08108  
Phone: (856) 858-4800  
Fax: (856) 858-4571

EMSL

SM

Attn: **Mick Roberts**  
**A.C.T. Services LLC**  
**783 North Clayton Street**  
**Lawrenceville, GA 30046**

3/14/2011

Phone: (770) 682-4343  
Fax: (770) 682-4986

The following analytical report covers the analysis performed on samples submitted to EMSL Analytical, Inc. on 3/10/2011. The results are tabulated on the attached data pages for the following client designated project:

## Palmetto Site - 11.06.001

The reference number for these samples is EMSL Order #011101203. Please use this reference when calling about these samples. If you have any questions, please do not hesitate to contact me at (856) 858-4800.

Reviewed and Approved By:



Julie Smith - Laboratory Director or other approved  
signatory



Accreditation #100194

The samples associated with this report were received in good condition unless otherwise noted. This report relates only to those items tested as received by the laboratory. The QC data associated with the sample results meet the recovery and precision requirements established by the AIHA, unless specifically indicated. The final results are not field blank corrected. The laboratory is not responsible for final results calculated using air volumes that have been provided by non-laboratory personnel. This report may not be reproduced except in full and without written approval by EMSL Analytical, Inc.



**EMSL Analytical, Inc.**

3 Cooper St., Westmont, NJ 08108

Phone: (856) 858-4800 Fax: (856) 858-4571 Email: jsmith@emsl.com



Attn: **Mick Robarts**  
**A.C.T. Services LLC**  
**783 North Clayton Street**  
**Lawrenceville, GA 30046**

Customer ID: ACTS51  
Customer PO:  
Received: 03/10/11 12:00 PM  
EMSL Order: 011101203

Fax: (770) 682-4986 Phone (770) 682-4343

Project: Palmetto Site - 11.06.001

**Analytical Results**

|                                  |                  |                      |                   |                        |                   |                      |                |  |
|----------------------------------|------------------|----------------------|-------------------|------------------------|-------------------|----------------------|----------------|--|
| <i>Client Sample Description</i> |                  | PS-7<br>Juan Agustin | <i>Collected:</i> | 3/4/2011               | <i>Lab ID:</i>    | 0001                 |                |  |
| <i>Method</i>                    | <i>Parameter</i> |                      | <i>Result</i>     | <i>Reporting Limit</i> | <i>Units</i>      | <i>Analysis Date</i> | <i>Analyst</i> |  |
| 7300 Modified                    | Lead             |                      | 2.7               | 0.79                   | µg/m <sup>3</sup> | 3/10/2011            | iacevedo       |  |

|                                  |                  |                          |                   |                        |                   |                      |                |  |
|----------------------------------|------------------|--------------------------|-------------------|------------------------|-------------------|----------------------|----------------|--|
| <i>Client Sample Description</i> |                  | PS-8<br>Work Area Center | <i>Collected:</i> | 3/4/2011               | <i>Lab ID:</i>    | 0002                 |                |  |
| <i>Method</i>                    | <i>Parameter</i> |                          | <i>Result</i>     | <i>Reporting Limit</i> | <i>Units</i>      | <i>Analysis Date</i> | <i>Analyst</i> |  |
| 7300 Modified                    | Lead             |                          | ND                | 0.79                   | µg/m <sup>3</sup> | 3/10/2011            | iacevedo       |  |

**Definitions:**

ND - indicates that the analyte was not detected at the reporting limit

[REDACTED]

## CHAIN OF CUSTODY FORM FOR AIR SAMPLE ANALYSIS

Client Name: A.C.T. Services Contact: Mich Robarts  
Address: 783 N. Clayton St. Phone: 770-682-4343  
Lawrenceville, Ga. Fax: 770-682-4986

[illegible]

|                          |                          |                                     |                          |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|                          |                          | 2 Days Rush:                        | Next Day Rush:           |

Round Time: Normal (5 days): 3 Days Rush.

Comments: Lead - Please fax copy of C.O.C. to A.C.T. c/o Mich.

Shipped: ☐ Delivered Direct to Lab: ☐

|                  |                         |           |                 |
|------------------|-------------------------|-----------|-----------------|
| Relinquished By: | <i>Robert J. Miller</i> | Date/Time | 3-8-11 6:15pm   |
| Received By:     | <i>Edna</i>             | Date/Time | 3/8/11 6:15pm   |
| Relinquished By: |                         | Date/Time |                 |
| Received By:     | <i>Edna</i>             | Date/Time | 3/10/11 12:00pm |



TIME : 03-11-'11 12:35  
FAX NO.1 :  
NAME :

```

FILE NO.           : 017
DATE               : 03.11 12:34
TO                 : 817706824986
DOCUMENT PAGES     : 1
START TIME         : 03.11 12:34
END TIME           : 03.11 12:35
PAGES SENT         : 1
STATUS             : OK

```

\*\*\* SUCCESSFUL TX NOTICE

## CHAIN OF CUSTODY FORM FOR AIR SAMPLE ANALYSIS

CHAIN OF CUSTODY FORM

Client Name: A.C.T. Services Contact: Mich. Roberts

Address: 783 N. Clayton St. Phone: 716-682-4343

Project Name: Calverton Site: 11.06.001

Sampler Name: Marty Mello

Sampling Date: 3-21-11

LABORATORY USE ONLY

[illegible]

| Turnaround Time:  | Comments: |
|---|-----------|
| Normal (5 days)   |           |
| <i>Lead - Please fax copy of C.O.L. to A.C.T. c/w Nick.</i> |           |

□  
sinet

Delivered Direct to Lab:  
Method of Shipment:  
Lab Recipient:  
Date:

Method of Shipment \_\_\_\_\_  
Lab Recipient \_\_\_\_\_  
Date \_\_\_\_\_

Date: \_\_\_\_\_

|                  |             |            |         |          |
|------------------|-------------|------------|---------|----------|
| Relinquished By: | W. J. P. M. | Date/Time: | 3-8-71  | 8:25 AM  |
| Received By:     | W. J. P. M. | Date/Time: | 3/9/71  | 6:15 PM  |
| Relinquished By: | W. J. P. M. | Date/Time: | 3/10/71 | 12:00 PM |
| Received By:     | W. J. P. M. | Date/Time: | 3/10/71 | 12:00 PM |

|           |                 |
|-----------|-----------------|
| Date/Time | 3/10/15 12:00pm |
|-----------|-----------------|

11-2-8

Witnessed By:

011101203

Progress Notes

Date: March 28, 2011

1. Built containment to contain dust and water in hot area between bathroom and shared pathway
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was duct tape, Tyvek suits and gloves, and rags.
4. .Completed 100% of containment will begin decontamination tomorrow.
5. Crew size was one supervisor and one worker.

Page 1 of 2

Page 2 of 2

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road



Belton, SC 29627

864-446-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: March 29, 2011

1. Started decontamination of hot area between bathroom and shared pathway, washed with vinegar, and scrubbed with wire brush, vacuumed all water and put in to a DOT approved 55 gallon drum with lead hazard stickers. Floor still hot, so we grinded the floor with a tanvasco grinder, all dust vacuumed and contained in a contractor bag with lead hazard stickers, and placed into a 55 gallon DOT approved drum.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, lead contaminated concrete dust Tyvek suites and gloves, and rags.
4. Completed approximately 50% of decontamination will continue tomorrow.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

Pictures of Containment built on 3-28 2011













WGE Belton, SC- PALMETTO Site

Progress Notes

Date: March 30, 2011

1. Continued decontamination of hot area between bathroom and shared pathway, washed floor with vinegar, and scrubbed with wire brush, vacuumed all water and put in to a DOT approved 55 gallon drum with lead hazard stickers.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, lead contaminated concrete dust Tyvek suites and gloves, and rags.
4. Completed approximately 50% of floor will continue tomorrow.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

Pictures of Containment built on 3-28 2011















WGE Belton, SC- PALMETTO Site

Progress Notes

Date: March 31, 2011

1. Continued decontamination of hot area between bathroom and shared pathway, washed floor with vinegar, and scrubbed with wire brush, vacuumed all water and put in to a DOT approved 55 gallon drum with lead hazard stickers.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, lead contaminated concrete dust Tyvek suites and gloves, and rags.
4. Completed approximately 100% of floor and took XRF readings on 60 2 foot by 2 foot squares, we will complete the last 60 tomorrow. All 60 squares were under 400 ppm
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

Pictures of Containment built on 3-28 2011

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 1, 2011

1. Completed decontamination and verified with XRF analyzer, with one reading taken in a 2 foot by 2 foot grid, we will include a map of all readings as soon as info is transferred. All area that were still reading higher than 400 ppm were cleaned again and verified again. We also started decontamination of the last hot area, beginning with the walls.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, lead contaminated concrete dust Tyvek suites and gloves, and rags.
4. Completed 100% of floor and took XRF readings on 60 2 foot by 2 foot squares. All squares are now reading under 400 ppm
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 4, 2011

1. Continued with decontamination of the last hot area, on the walls.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, Tyvek suites and gloves, and rags.
4. Completed 2 sections of wall, we will continue on the wall for the remainder of the week
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 5, 2011

1. Continued with decontamination of the last hot area, on the walls.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, Tyvek suites and gloves, and rags.
4. Completed 65% of wall, we will continue on the wall for the remainder of the week
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 6, 2011

1. Continued with decontamination of the last hot area, on the walls. Also decontaminated 7 pieces of restaurant equipment in the back of the room.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, Tyvek suits and gloves, and rags.
4. Completed 95% of wall, we will continue on the wall for the remainder of the week, and start on the red steel, and the random equipment stored in the area.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

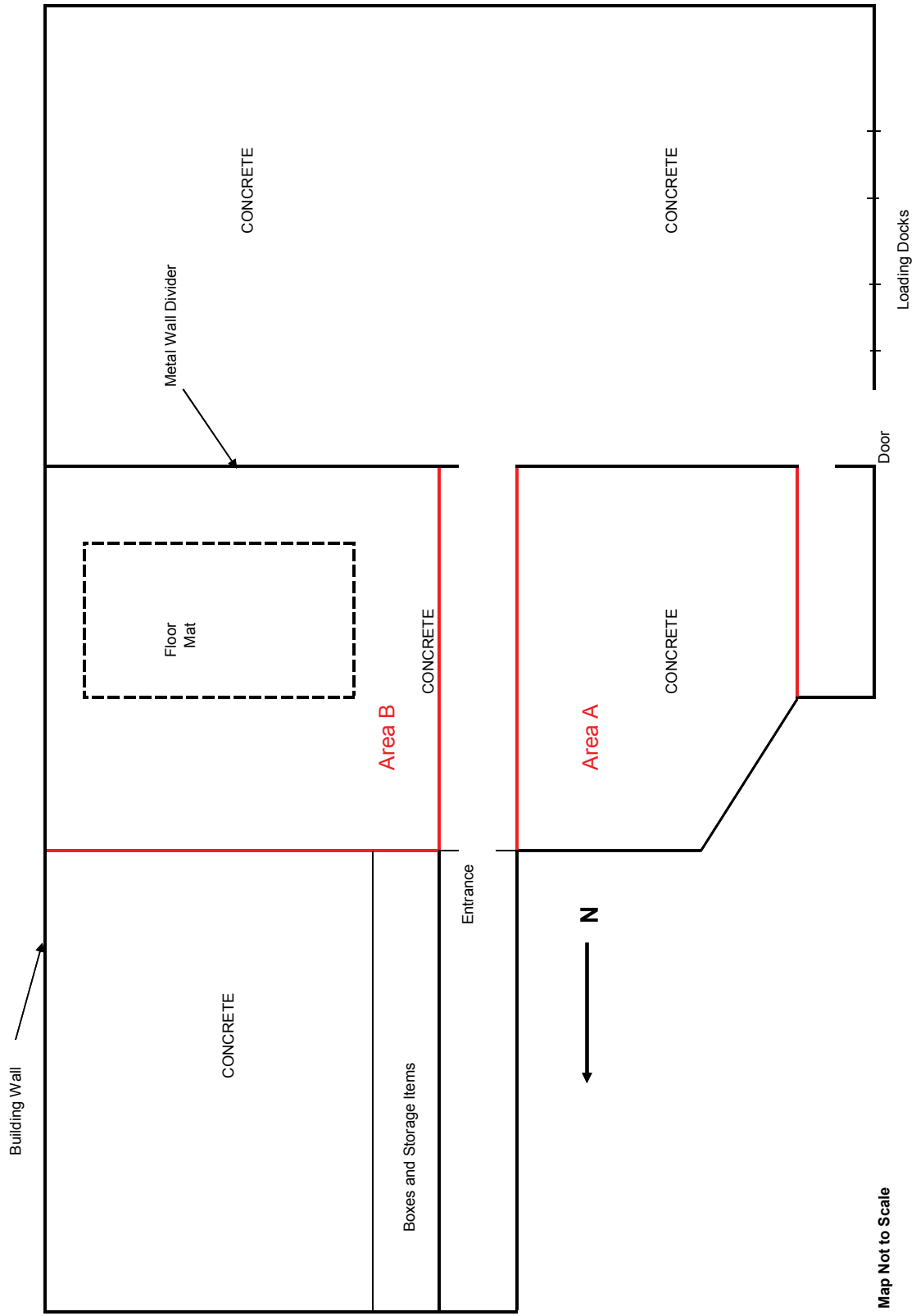
Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WELCH GROUP ENVIRONMENTAL - PALMETTO FACILITY  
Areas of Decontamination



Map Not to Scale

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 8, 2011

1. Continued with decontamination of the last hot area, the red steel along the wall and the ceiling. Also 2 pieces of restaurant equipment that did not pass testing in the back of the room.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, Tyvek suits and gloves, and rags.
4. Completed 100% of wall, we started on the red steel, approx. 25% completed, and the random equipment stored in the area. Jerry, EPA contractor, came out to site and took some readings with the XRF gun. Readings on the concrete that had been ground ranged from 100-150 ppm. Readings from the red steel that had been cleaned ranged from 400-600 Pb. Jerry took a swipe sample of red steel and walls for testing and ranged from 12-15 ppm.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 11, 2011

1. Continued with decontamination of the last hot area, the red steel along the wall and the ceiling. Including the insulation along the wall and ceiling.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, Tyvek suites and gloves, and rags.
4. Completed 100% of wall, also we finished all the red steel. Started decontamination on the insulation and completed approximately 30%.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 12, 2011

1. Continued with decontamination of the insulation on walls and ceiling..
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was water and vinegar, Tyvek suites and gloves, and rags.
4. Completed 100% of decontamination of insulation.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 13, 2011

1. Jerry started taking swipe readings on insulation on walls. All readings were below 400 ppm.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suits and gloves, and rags.
4. Completed 100% of decontamination of insulation.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 14, 2011

1. Started removing burnt insulation from corner of building where fire occurred.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was burnt insulation, Tyvek suits, gloves, and rags.
4. Completed 50% of insulation removal.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 15, 2011

1. Continued with removal of burnt insulation from corner of building where fire occurred.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was burnt insulation, Tyvek suits, gloves, and rags.
4. Completed 100% of insulation removal.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 18, 2011

1. Started on grinding of concrete floor in area b. Received training on Niton XRF analyzer.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag. Vacuumed concrete dust with wet/dry vac, emptied vac into black contractor bags sealed and placed lead hazard sticker on bag
3. Waste generated was lead contaminated concrete dust, Tyvek suites, gloves, and rags.
4. Completed 25% of grinding on floor.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 19, 2011

1. Started reading insulation on ceiling in area b with xrf analyzer with the swipe method.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was swipe testing media, Tyvek suites, gloves, and rags.
4. Completed 45% of reading on ceiling insulation.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 20, 2011

1. continued reading insulation on ceiling in area b with xrf analyzer with the swipe method.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was swipe testing media, Tyvek suites, gloves, and rags.
4. Completed 85% of reading on ceiling insulation.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 21, 2011

1. Continued reading insulation on ceiling in area b with xrf analyzer with the swipe method.  
Started preparations for grinding of floor in area b
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was swipe testing media, Tyvek suites, gloves, and rags.
4. Completed 100% of reading on ceiling insulation.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 22, 2011

1. Started grinding of floor in area b.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was lead contaminated concrete dust, Tyvek suites, gloves, and rags.
4. Completed approximately 25% of grinding.
5. Crew size was one supervisor and two workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 25, 2011

1. Continued grinding of floor in area b.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was lead contaminated concrete dust, Tyvek suites, gloves, and rags.
4. Completed approximately 45% of grinding.
5. Crew size was one supervisor and two workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 26, 2011

1. Continued grinding of floor in area b.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was lead contaminated concrete dust, Tyvek suites, gloves, and rags.
4. Completed approximately 65% of grinding.
5. Crew size was one supervisor and two workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 27, 2011

1. Continued grinding of floor in area b.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was lead contaminated concrete dust, Tyvek suites, gloves, and rags.
4. Completed approximately 75% of grinding.
5. Crew size was one supervisor and two workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 28, 2011

1. Continued grinding of floor in area b.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was lead contaminated concrete dust, Tyvek suites, gloves, and rags.
4. Completed approximately 85% of grinding.
5. Crew size was one supervisor and two workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: April 29, 2011

1. Completed grinding of floor in area b.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was lead contaminated concrete dust, Tyvek suites, gloves, and rags.
4. Completed approximately 100% of grinding.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 02, 2011

1. Started wiping dust of walls, red steel, and floor of area b, That was created by grinding the concrete floor.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was lead contaminated concrete dust, Tyvek suites, gloves, and rags.
4. Completed approximately 100% of cleaning on walls, red steel, and floor.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 03, 2011

1. Began gridding floor in area b with 2' x 2' grid for XRF verification of below 400 ppm of lead content. Started XRF analyzing floor in area b with one reading taken in each 2' x 2' square
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed 100% of grid in area b. Completed approximately 25% of XRF verification.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 04, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 35% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

**MAY 12 2011**

**ENFORCEMENT ACTION MEMORANDUM**

**SUBJECT:** Request for Approval for Removal Action at the Welch Group Environmental (WGE) Palmetto Site, Anderson County, South Carolina

**FROM:** Leo Francendese, On-Scene Coordinator  
Emergency Response and Removal Branch

**THRU:** Shane Hitchcock, R4 Chief  
Emergency Response and Removal Branch

**TO:** Franklin E. Hill, Director  
Superfund Division

**SITE ID:** B4F6

**I. PURPOSE**

The purpose of this Action Memorandum is to request and document approval of a proposed time-critical removal action described herein for the WGE Palmetto Site in Belton, Anderson County, South Carolina. The release of hazardous substances at the Site poses a threat to public health and the environment pursuant to Section 104(a) of CERCLA and the conditions at the Site meet the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), Section 300.415(b)(2) criteria for removal actions.

This action will be implemented under an Administrative Order and Agreement on Consent (AOC) with the Welch Group Environmental (WGE) and Gary Warehouse Services (GWS) under Sections 104(a), 106(a), and 107 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980. This time-critical removal action is a follow-up action to the emergency response action.

**II. SITE CONDITIONS AND BACKGROUND**

**Site Specific ID Number:** B4F6

**Removal Category:** Time-Critical Removal Action

**CERCLIS ID:**

## **A. Site Description**

This section of the Action Memorandum provides a description of the Site conditions and relevant background information.

### **1. Removal Site Evaluation**

This site is part of the Welch Group Environmental (WGE) CERCLA response sites. WGE operated a business that recovered lead and other metals (i.e copper) from spent munitions at firing ranges gathered from around the Southeast. They then melted the lead into ingots.

SCDHEC requested removal site evaluations (RSEs) at two other WGE facilities located in Fair Play and Belton, South Carolina. The SCDHEC referral letter is included in Attachment A. While conducting removal site inspections (RSIs) that resulted in emergency responses at the above locations, the OSC was notified by SCDHEC on February 4, 2011 that additional operations had occurred at a Palmetto Hwy warehouse. The WGE Palmetto Site was part of WGE's operations and served as warehouse storage. X-Ray Fluorescence (XRF) and laboratory results for soil samples collected during the RSE are summarized in this section. The full RSI report is included as Attachment B.

During the site walk with property owner Cummings Gary, WGE indicated that a box of range recovered material had overturned during cleanup and a metal shovel was used to recover the spilled material. During recovery, the metal shovel scraped against the residual gun powder (green powder) covered concrete floor creating a spark. The ensuing fire partially damaged the building leaving burnt insulation and roofing material

The Superfund Technical Assistance Response Team (START) screened floors and walls at this property. XRF readings for lead ranged from the low hundreds to 35000 ppm on the floors and walls of the area where WGE stored property. WGE no longer stores property at this location.

The OSC directed the PRP to conduct an emergency response action to secure the area and take containment or remediation actions to address the high concentration lead dust levels on both structure surfaces and debris. USEPA, supported by ATSDR uses a risk based, unrestricted land use, lead concentration level of 400 ppm.

The RSI for this Site was completed on March 7, 2011 and is included as Attachment B. The RSE has been concluded and the OSC proposes further time critical activities. It is the OSC's expectation that the removal action will be conducted under an AOC.

### **2. Physical Location**

The Site is located at 110 Palmetto Parkway in Belton, Anderson County, South Carolina. The geographic coordinates for the center of the property are Latitude 34.5228881° North and Longitude -82.4942948° West. The topographic map is presented in Attachment C. The Site is comprised of a one-story warehouse building where WGE stored recovered lead slugs and shell casings from gun/rifle ranges. Several different clients lease space within the multi-use warehouse, but the building is not partitioned into individual units. Residential properties are located to the east, west, and south of the warehouse building. A large one-story warehouse building bounds the Site to the north. An aerial image of the Site is included in Attachment C. Anderson County had a total

population of 184,901 in 2009. The county is primarily rural with small municipalities comprising the county.

### **3. Site Characteristics**

The site is an operational multi-use industrial warehouse.

### **4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant**

Lead is a hazardous substance as defined under Section 101 (14) of CERCLA and listed in Title 40 of the Code of Federal Regulation (CFR), Section 302.4. Lead is present at high levels in the warehouse along the facility floors and walls. The XRF measurements are included in Attachment D.

### **5. NPL Status**

The Site is not on the National Priority List.

### **6. Maps, Pictures, and Other Graphic Representations**

All removal file information, including maps and aerial photos of the Site, will be maintained by the PRP and the OSC. Site related documents can be viewed at the following website: [http://www.epaosc.org/site/site\\_profile.aspx?site\\_id=6682](http://www.epaosc.org/site/site_profile.aspx?site_id=6682)

## **B. OTHER ACTIONS TO DATE**

### **1. Previous Actions**

As indicated above, emergency response removal measures were initiated at the direction of the OSC. The PRPs have hired a qualified contractor to perform the emergency response actions. Both a health and safety (HASP) as well as removal action work plans (RAWPs) have been submitted and approved by the OSC in consultation with SCDHEC. Emergency response work was completed on February 21, 2011. The work included securing the area and taking containment actions.

The removal site inspection (RSI) report was completed on March 7, 2011 with a subsequent removal site evaluation (RSE) recommendation for further action. A copy of the WGE Palmetto Hwy RSI report is included in Attachment A.

The OSC will continue to coordinate enforcement activities with SCDHEC. In addition, the OSC is coordinating with EPA R4 RCRA to assure that WGEs proposed gun range recovery activities meet with applicable federal RCRA standards.

## 2. Current Actions

During a February 7, 2011 site walk, the OSC tasked START to use an XRF to conduct in situ screening for metal concentrations at select locations of the building. START screened the floor and walls of areas where most site operation activities took place. WGE operations occupied approximately 4,000 square feet (ft<sup>2</sup>) of warehouse space. XRF readings for lead ranged from 408 parts per million (ppm) on the warehouse floor to 35,000 ppm along the building walls.

Based on the XRF lead screening results and the unrestricted multi-use, the OSC determined that a release or substantial threat of release of a hazardous substance to the environment had occurred. The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

On February 10, 2011, a Notice of Federal Interest (NOFI) was issued to the site owner, Mr. Cummings Gary. The OSC directed the site operator, WGE, to secure and remediate the contaminated section of the warehouse. WGE's immediate goal was securing the facility from other facility personnel. A copy of the Initial ER POLREP is included in Appendix E.

On February 17, 2011, WGE contractor was on site to cover the concrete flooring in designated areas with an industrial paper until remediation activities could occur. Safety barricades were used to delineate the exclusion zone (area where WGE stored the range recovered material) to prevent non response-related personnel from entering. WGE contractor submitted a Pilot Test Work Plan proposing decontamination of approximately 1,400 ft<sup>2</sup> of the warehouse floor to determine contaminant reduction concentrations below the EPA regional screening levels (RSL) of 400 ppm

On February 21 and 22, 2011, Phillips was on site to conduct the decontamination Pilot Test. Pilot testing was performed in a small area of the warehouse floor near the loading docks. Initial XRF readings for lead near the loading docks ranged from 1,399 to 1,570 ppm. The concrete near the loading docks was smooth in some areas and pitted and showing signs of deterioration in others. A detergent solution and water was used to clean the small area. The area was then rinsed with minimal water, vacuumed, and allowed to dry before confirmation screening using the XRF. A steel wire brush was used by WGE contractors in several areas to determine its effectiveness.

On February 28, 2011 through March 2, 2011, START observed WGE contractors continue with the decontamination Pilot testing activities. WGE contractors monitored air particulates while cleaning activities were being conducted. There were sections of the warehouse pathway where concentrations were still above 400 ppm. WGE contractors used a tavasco grinder on the floor and vacuumed dust with a high efficiency particulate air vacuum. The areas of the previously covered pathway were screened and readings were below 400 ppm.

EPA tasked WGE with developing a Work Plan for remediating the debris and remaining surface areas of concern in the warehouse while maintaining security to unqualified personnel for the area. WGE will submit the Work Plan to the OSC for approval and it will be incorporated into an upcoming time critical removal action under an Administrative Order on Consent (AOC).



## **C. STATE AND LOCAL AUTHORITIES' ROLE**

### **1. State and Local Actions to Date**

This site is part of the WGE CERCLA response. SCDHEC notified EPA Region 4 Emergency Response and Removal Branch (ERRB) of the Site while EPA was conducting RSE at two other WGE facilities located in Fair Play and Belton, South Carolina. The WGE Palmetto Hwy Site was part of WGE's operations and served as warehouse storage.

### **2. Potential for Continued State and Local Response**

EPA will continue to play a large role in the response activities at the Site and will continue to oversee activities under the AOC. EPA will coordinate with the State to ensure they are apprised of all progress made under the Administrative Order and Agreement on Consent.

## **III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Conditions resulting from the storage of lead contaminated material at WGE Palmetto Hwy site present a substantial threat to the public health or welfare and the environment if not properly managed and meet the criteria for a time-critical removal action as provided for in the NCP Section 300.415(b)(2). The primary criteria include:

- **Section 300.415(b)(2)(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:**

The contaminated warehouse presents a potential human exposure threat through direct contact, and inhalation.

## **IV. ENDANGERMENT DETERMINATION**

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare or the environment.

## **V. PROPOSED ACTION**

### **A. Proposed Actions**

The proposed actions listed below have been developed in coordination with the SCDHEC, EPA, and the PRP. These actions are designed to promote public welfare by removing the contaminated dust from the Site. A removal action work plan will be developed by the PRP to implement the actions described below.

## **1. Proposed Action Description**

Steps must continue to secure to the section of the warehouse that has high lead concentration dust in order to reduce the direct exposure pathways to nearby human populations and to stop off-site migration of the lead dust.

The primary component of this removal action is the removal of contaminated dust from the Site. The contamination will be removed, accompanied by appropriate monitoring and best management practices to ensure protection of human health and environment.

The time critical removal action will execute the proposed actions:

- Implement an approved Health and Safety Plan
- Implement an approved Dust Monitoring and Management Plan
- Implement an approved Decontamination Plan
- Implement an approved Waste Disposal Plan

## **2. Contribution of Remedial Performance**

The proposed removal action will address the threats discussed in Section III, which meet the NCP Section 300.415(b)(2) removal criteria. The removal action contemplated in this Action Memorandum is consistent with future potential remedial actions.

## **3. Description of Alternative Technologies**

The use of alternative technologies is not anticipated. The PRP will submit to the OSC for evaluation, a technical memorandum documenting the evaluation of best management practices and available technologies concerning treatment if any treatment is to be considered.

## **4. Engineering Evaluation/Cost Analysis (EE/CA)**

This proposed action is a time-critical removal and does not require an EE/CA.

## **5. Applicable or Relevant and Appropriate Requirements (ARARs)**

This action is being conducted as a time-critical removal action. Pursuant to the NCP, removal actions conducted under CERCLA are required to attain ARARs to the extent practicable, considering the exigencies of the situation. Waivers described in 40 CFR 300.430 may also be used for removal actions. Potential ARARs for this Site include portions of RCRA Subtitle C and DOT requirements for management and shipment of hazardous waste, respectively. All wastes transferred off-site will comply with the CERCLA Off-Site Rule pursuant to CERCLA 121(d)(3) and 40 CFR 300.440.

### **A. Project Schedule**

Removal activities began as an emergency action under the direction of the OSC. The operational aspect of the time-critical removal action is expected to take less than 90 days.

## B. Estimated Costs

Estimated costs are not included as this removal action is anticipated to be implemented as an enforcement-lead action.

## VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Failure to conduct this action in a timely manner increases the likelihood of human health exposure.

## VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues.

## VIII. ENFORCEMENT

This action is being undertaken pursuant to an AOC between WGE, GWS and EPA.

## IX. REFERENCES

[http://www.epaossc.org/site/site\\_profile.aspx?site\\_id=6682](http://www.epaossc.org/site/site_profile.aspx?site_id=6682)

## X. RECOMMENDATION

This decision document represents the selected removal action for the Welch Group Environmental Palmetto Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan (NCP). The document is based on the administrative record for the Site.

Conditions at the Site meet the NCP Section 300.415 (b)(2) criteria for a time-critical removal action.

APPROVED: 

Franklin E. Hill, Director  
Superfund Division

DATE: 5/12/11

DISAPPROVED: \_\_\_\_\_

Franklin E. Hill, Director  
Superfund Division

DATE: \_\_\_\_\_

Attachments



**ATTACHMENT A**  
**SCDHEC Referral Letter**





December 22, 2010

Via email and US Mail

Mr. Jim McGuire, Chief,  
Removal Operations Section  
US EPA, Region IV  
61 Forsythe Street  
Atlanta, Georgia 30303-3104

RE: Welch Environmental Group Sites  
Welch – Fair Play, SC Site  
Welch – Belton, SC Site

Dear Mr. McGuire:

The purpose of this letter is to formally refer the Welch/Fair Play site and the Welch/Belton sites to EPA's Emergency Response and Removal Branch for consideration of a CERCLA removal action. The Welch/Fair Play Site, is located at 170 Feltman Farm Rd. Fair Play, SC (34.523322°N, -82.991355°W) and the Welch/Belton site is located at 5043 Belton Hwy, Anderson, SC 29621 (34.483261°N, -82.563679°W).

The PRP, Welch Environmental Group, operates a business that recovers lead and other metals (copper primarily) from spent munitions at firing ranges gathered from ranges around the southeastern U.S., and then melting the lead into ingots. The melting operations took place at the Welch/Fair Play site. Slag materials are present there as well as at the Belton site. The Belton site was where separation operations were carried out. In addition several hundred drums of salt formulations from a different business venture of Mr. Welch's are present, many of which are uncovered.

These activities were being conducted without any DHEC issued permits.

Blood lead levels in employees at both sites (not including Mr. Welch whom declined) were collected and all 10 were found to have significantly elevated lead levels.

The PRP has been told to shut down all lead recovery operations as of December 2, 2010.

The State Superfund Program is requesting that EPA perform a removal site evaluation at each of these sites to determine if either site qualifies for a federal removal action. The Department would like to participate in any activities and requests that you or your OSC provide us notice of any site visits and removal activities, or any community engagement..

Attached is some supporting information. Attachment I is a timeline of DHEC events as they unfolded with photos of both sites. Attachment 2 has site maps for each. We have additional site photos and field and lab analytic data available as you may need it. DHEC has also conducted some limited soil sampling at surrounding properties to the Fair Play site.

Thank you for your consideration of our request. If you would like to discuss this request or need

additional information, please contact me at (803) 896-4054 or Ken Taylor, Division Director, at (803)896-4011 (taylorgk@dhec.sc.gov).

Sincerely,

R. Gary Stewart, P.E., Manager  
State Remediation Section  
Bureau of Land and Waste Management

Enclosure

cc: Ken Taylor, Director SARR, BLWM, DHEC  
Jonathan McInnis  
Chris McCluskey, Region 1 EQC Director,  
Rick Caldwell, ABC, EQC Bur. Environmental Services  
File

Attachment 1:  
MEMO: Welch Group Environmental

Written By: Tyler Smith – Anderson EQC

10/13/2010

- Received phone call & email from Susie Makison (Reg I - Anderson Epidemiologist) about Welch Group Environmental employee with blood lead level (BLL) of 97 ppm.
- Susie Makison (864) 202-1390
- Welch Group Environmental has website... <http://hotleadinc.com>. Recycle lead bullets from gun ranges.
- Glenn Welch – owner of Welch Group Environmental (864) 314-3803.
- EFIS – Glenn Welch issued permit Aug. 06, 2007 for Air - asbestos demolition permit at 103 Rice St. Belton, SC 29627 (103 Rice St. Belton – does not exist on Anderson County Tax Assessor)

10/14/2010

- Spoke with Karen Sprayberry (SC DHEC) about Welch Group Environmental. She also spoke with Phyllis Copeland (SC DHEC) about Welch – no air permit. Karen said she would try and contact the Welch employee that had BLL of 97 to find out how he was exposed.

10/15/2010

- Stephanie Smith-Strack (SC DHEC) and I drove around Rice Rd. in Belton – could not locate a facility.

10/26/2010

- Called Scott Hanks (City of Belton – Director of Utilities) to see if he knew about Welch Group Environmental. He said that Welch Group Environmental at one time was operating in a warehouse on Rice Rd. in Belton. He said the warehouse isn't actually on Rice Rd. it is on Palmetto Parkway. Mr. Hanks said he did respond to a fire at this facility and to call Allen Simms with the Fire Department. Mr. Hanks also mentioned that Cummings Gary owns the property at 103 Rice Rd. Belton.
- Allison McCullough (SC DHEC) emailed me Allen Simms (City of Belton Fire Department – Chief) phone number (864) 338-7048.
- I spoke with Chief Simms about Welch Group Environmental. He said that the fire department did receive an emergency call to 103 Rice Rd. Belton, SC about a year to a

year and a half ago for explosion/fire and that a man was burned in the incident. He said that facility did contain a large amount of brass shell casings.

10/28/2010

- Received email from Karen Sprayberry with contact information for Welch Group Environmental employee and that OSHA had been contacted.
  - Earnest Colton
  - Jackson, Mississippi
  - 601-573-7140

10/29/2010

- I spoke with Earnest Colton and he said that he was exposed to the lead from using a leaf blower to separate the brass and lead from dirt and rocks inside the facility. He said that Welch Group Environmental does not melt lead and that he didn't think Welch was operating anymore. Mr. Colton said that he did wear a respirator, but it would clog up while he was wearing it. I asked where the facility was located and he said Belton.

11/2/2010

- Karen Sprayberry called and said that OSHA did an investigation and that Welch Group Environmental was operating in Belton, SC and Fair Play, SC. The Fair Play site is where the lead is melted. Karen gave me the OSHA Contact - Terry Heightbar (803) 896-7728 and (803) 206-0467.
- I called Terry with OSHA – LLR and he described the operation to me.
- Glenn Welch is the owner of Welch Group Environmental and has a processing facility in Belton, located on Belton Hwy. The facility is a white building with 3 bay doors. Brass and lead are processed here and then taken to Fair Play facility to be melted. The Fair Play facility is located on Feltman Farm Rd. The melting is done in an open air, 40' x 40' block building with a metal roof. There is a 3'x 3' x 1'deep melting pot located inside the facility. The melting pot is heated by kerosene at 650 degrees Fahrenheit. Impurities are skimmed off and put into a 55 gal container. The melting operation, generally does a minimum of 2500 lbs of lead and could do as much as 25000 lbs in one night. Lead is brought in from other states and is hauled to a site in Tennessee with rental trucks.
- Paul Wilkie (SC DHEC) and I made a site visit to the Welch Group Environmental site located on Belton Hwy. The facility address is 5034 Belton Hwy. There is no business sign/name on the building. It appeared that only sorting is occurring at this address during our visit. No owners were present, only three workers. We spoke with one person who told us that Welch ran the business and his phone number (864) 314-3803.

- During the site visit we estimated there to be around 400-500, 55 gal drums on-site. Many drums are not properly closed. None of the drums are labeled. Many of the open 55 gal drums contained a fine gray metallic dust. The same dust was found in gaylord boxes, these were labeled 2211 9. The majority of the drums are located on the backside of the property.
- I called Chris McCluskey (SC DHEC) and told him what Paul and I found at the site.
- I also called Steve Burdick (SC DHEC) and described the site to him. Steve said he had spoken with Chris McCluskey and they were available to make a site visit tomorrow morning.

11/3/2010

- I called Glenn Welch and asked if he could meet us at his business located on Belton Hwy. He said he wouldn't be available, but for us (SC DHEC) to go ahead and take a look around the site and to take any samples that we needed. Mr. Welch said he would call Felix to let him know we were heading to the site and to open up any drums for us.
- Steve Burdick, Dana Cook (SC DHEC), Chuck Arnold (SC DHEC), Stephanie Smith-Strack and myself made a site visit to the Welch Group Environmental site located on Belton Hwy.
- Upon arrival at the site, I went to the bay door that was open and asked for Felix. Felix came outside and I asked if he would unlock the gate and open a few drums for us. He opened the gate and opened two 55 gal drums for us. Felix stated that the material inside the drum was "salt".
- Steve Burdick used the XRF gun to analyze a representative number of drums on-site that contained what appeared to be different types of material.
- I called Glenn Welch once again asked if our department could take samples. Mr. Welch agreed and said he would be on-site in 20 minutes.
- 68, 55 gal drums (black with white lids) were located behind the main building.
- Glenn Welch arrived at the site around 12:15 pm.
- I asked Glenn Welch what type of material was in the drums. Mr. Welch said that the majority of the drums contained "salt". I asked where the material came from and Mr. Welch said from Fisher/Barton in Fountain Inn and that the company makes lawn mower blades and the salt came from the "quench tanks." Mr. Welch said he had the "salt" analyzed by an independent lab and the 'salt' material wasn't hazardous. Mr. Welch said he would have his assistant Kasey Whitfield send me an email documenting the results.
- I asked Glenn Welch what the fine gray metallic dust was and he said left over material from processing the bullets. He also said that the material that was left over would be returned to the gun ranges in approximately 6-8 months.
- Five split samples were taken from the site. Five samples were given to Glenn Welch on-site.
- I then told Glenn Welch that our department was aware of the melting site in Fair Play and we would like to take a look at the site today. Mr. Welch said he didn't have a key



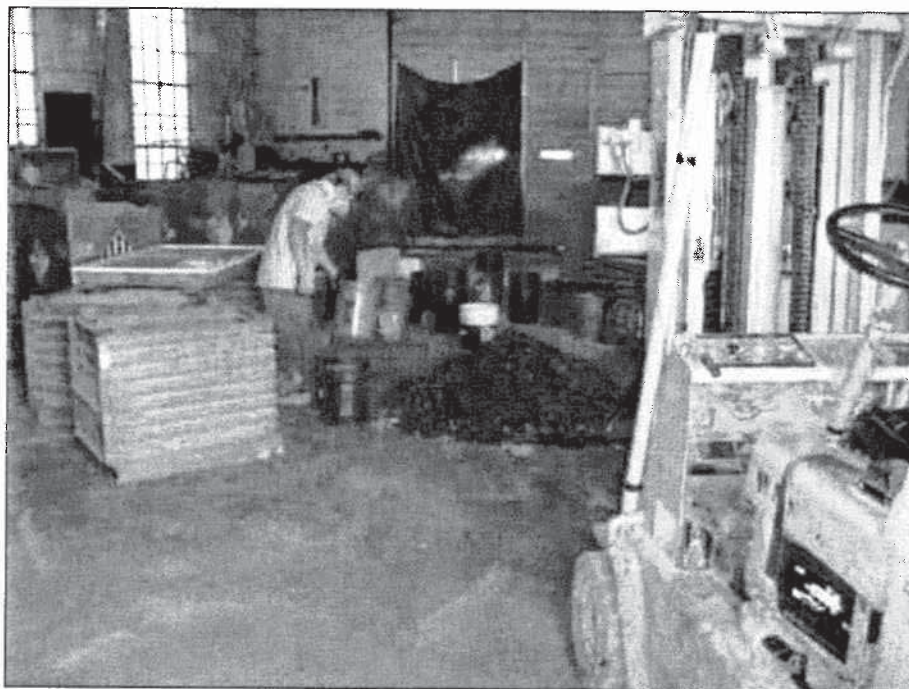
and he didn't own the property and he would have to call the property owner to see if we could get access. Mr. Welch called the property owner and the property owner said he was in Talledega, AL and he couldn't let us on the property until Monday. I then called Chris McCluskey and told him about the property owner in Fair Play refusing to give us access until Monday. Chris McCluskey then spoke with Stephanie Smith-Strack about obtaining the property owner's name and phone number to speak with him about gaining access to the Fair Play property. Mr. Welch told us the property owner's name in Fair Play was James Feltman and he could be reached at home (864) 647-4157. Stephanie called the number and the phone number that was called had a recording that said this phone is not accepting phone calls. Stephanie asked Mr. Welch if that was the correct number and Mr. Welch said, "yes, I just reached him on it." Stephanie called the number again and once again she received a recording. Stephanie then asked Mr. Welch for another number that Mr. Feltman could be reached. Mr. Welch went to his truck to get another number to call (864) 346-1160. Stephanie did reach Mr. Feltman with this number and Stephanie asked multiple times if our department could be granted access to the property today. She explained that SC DHEC wanted to look at both properties as part of the inspection process. Mr. Feltman was reluctant each time and said he was not in town and we could come on Monday. Stephanie told Mr. Feltman that if our department were not granted access today, our department would begin the process of obtaining a search warrant from the local magistrate in order to gain access. At that time Mr. Feltman said he would call someone to allow our department on the property and he would call Mr. Welch back to let him know who would meet us at property (phone call was made at 1:30 pm). We then left the Belton Hwy site to head to the Fair Play site. Stephanie received a phone call (1:46 pm) from Mr. Welch saying he would meet us at the property in Fair Play.

- We arrived at the Fair Play site around 3:22 pm, where we met Glenn Welch and James Feltman. The site is located at Feltman Farm Rd. in Fair Play, SC.
- Glenn Welch described the process at the facility. Mr. Welch said that lead is placed in the "re-melting pot" (3' x 3' x 1' deep – surrounded by brick). The lead is heated to 675 degrees Fahrenheit. Stephanie Smith-Strack asked how do you know when you have reached that temperature. Mr. Welch said I used to have a thermostat, but we don't have one anymore, he said that the way he tells that it's at the right temperature is when there are just fumes and not smoke. Once the lead is melted, the copper and slag is skimmed off the top and placed in a 55 gal drum. The molten lead is poured into ingot molds utilizing 1 gal paint buckets. Once the skimmed material dries it is screened. The copper is sold and the other "material" is put back into 55 gal drums. 50 drums of this "material" were sitting outside the facility, not labeled or closed. There is an accumulation of gray dust that was swept outside the facility entrance onto the ground. The facility is 42' x 42' in size. Mr. Welch said that the lead ingots are sold to O. G. Kelley in Johnston City, TN. [www.ogkelley.com](http://www.ogkelley.com) No samples were taken at this facility, but the XRF gun was used. The material at this site was representative of what was at the Welch Group Environmental site in Belton. Stephanie told Mr. Welch that he would receive an Air Quality violation for operating without a permit. If Mr. Welch had any documentation from BAQ to send it to Stephanie by 11/8/2010. We then exited the facility at 4:30 pm.

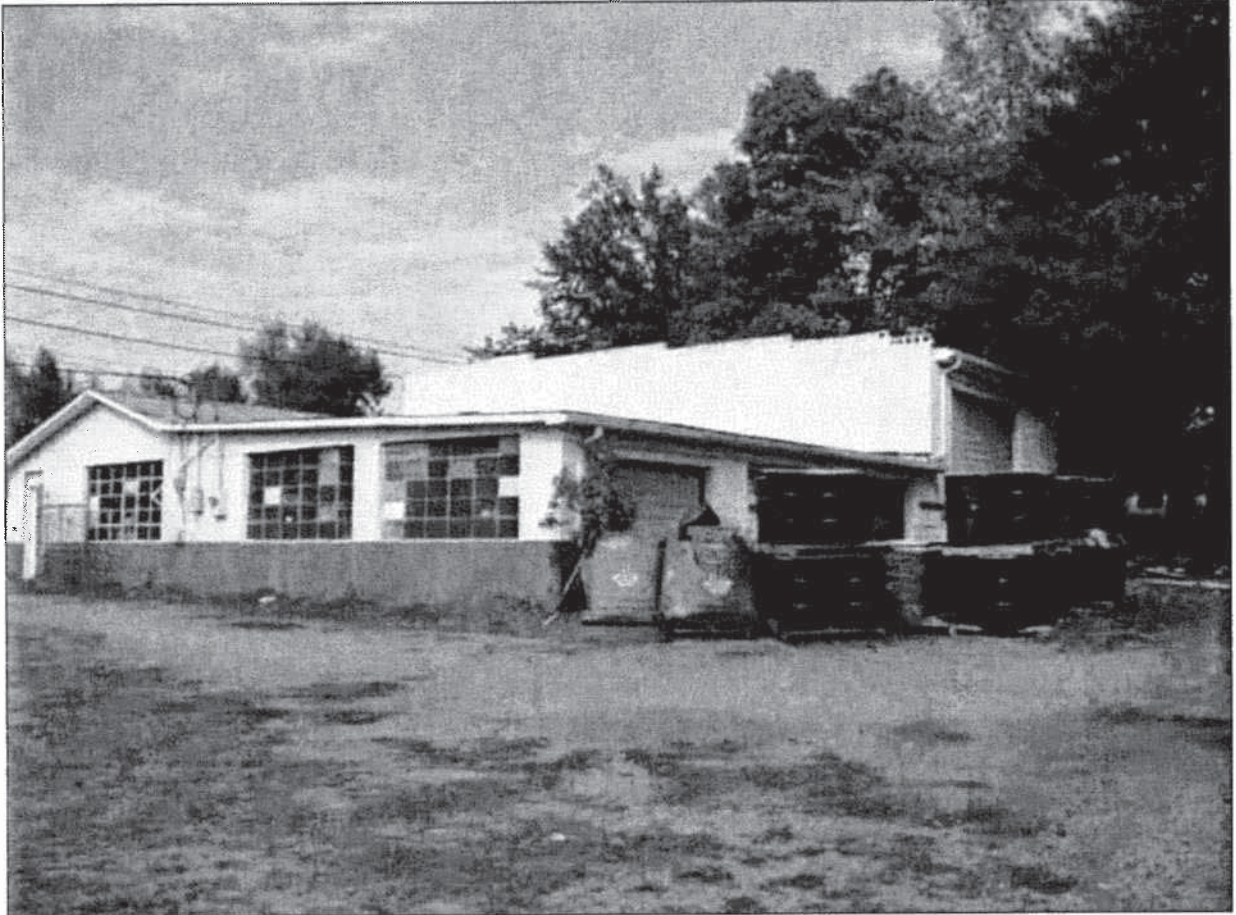
11/4/2010

- Documents concerning the air permit were faxed today. Documents that were supplied to Stephanie were communication between Welch group and SC DHEC Small Business. There was no determination of exemption. A construction permit application has not been submitted. Also included was communication between Welch group and an engineering firm. The description of the system that the submitted to the engineering firm for the requirements to complete the air permit does not match what is actually on site.

WELCH GROUP ENVIRONMENTAL – BELTON FACILITY



68 drums located behind main building





Estimated 350-400 drums located on backside of facility





Gray powder/dust – left over material from processing/melting lead









WELCH GROUP ENVIRONMENTAL – FAIR PLAY FACILITY





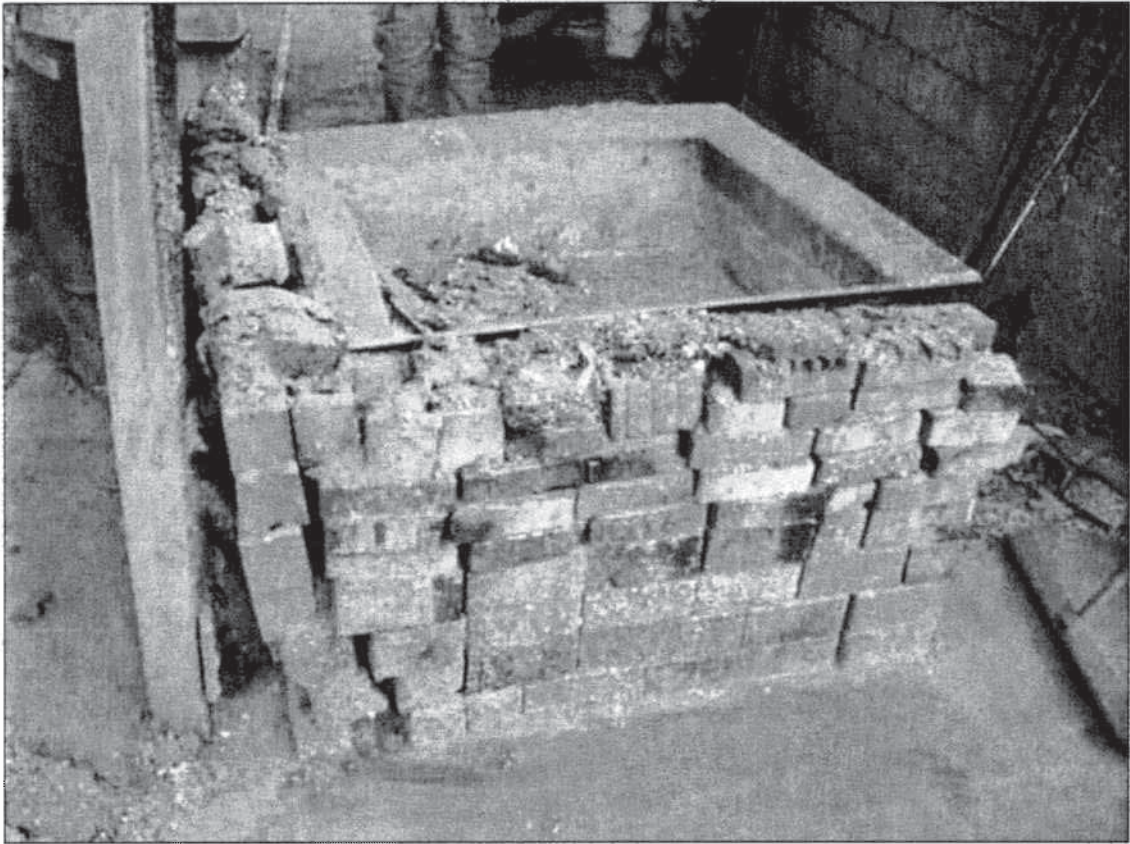




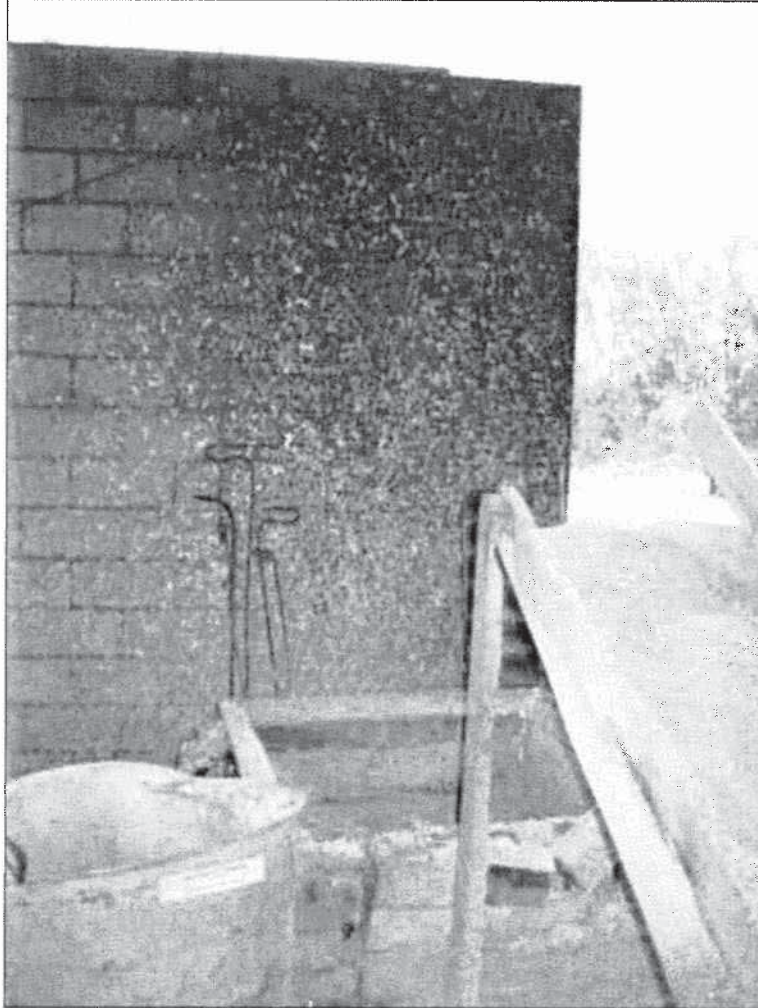
Leftover processed material



Melter (3' x 3' x 1' deep)



Melter and splattered lead on wall





Processed material swept outside



Processed material/slag inside facility





More processed material swept outside



Total of 42 drums in this area – processed material

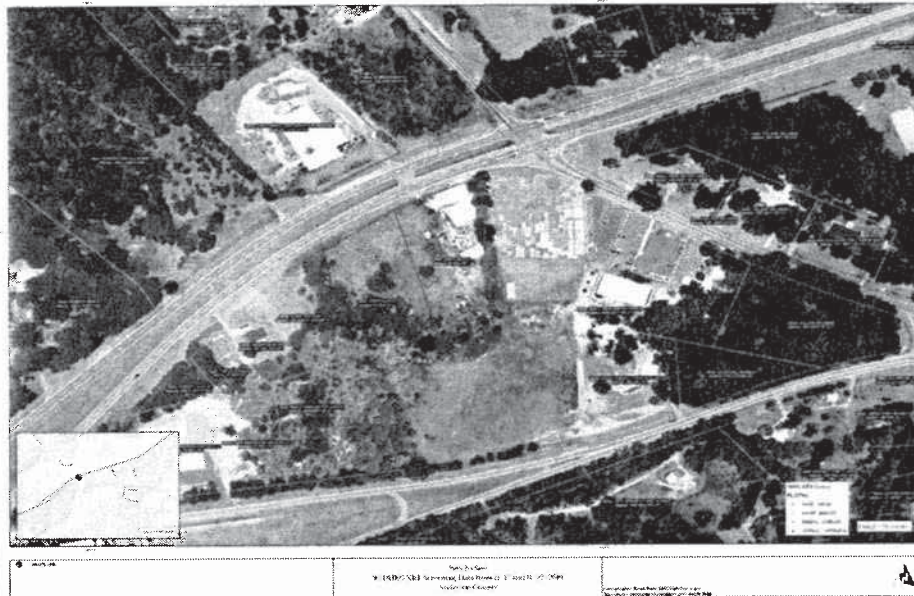




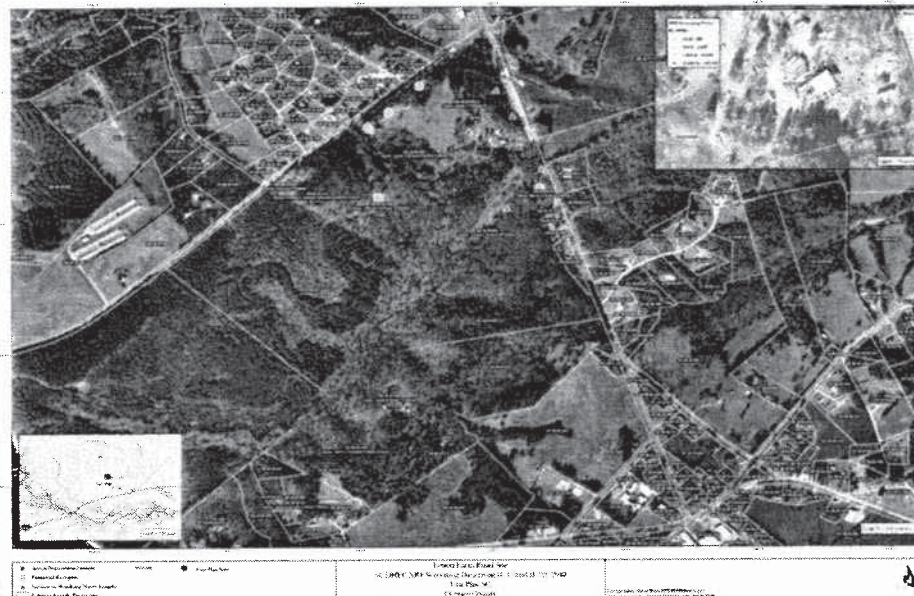
# Attachment 2

Site Maps:

Belton



Fair Play:



**ATTACHMENT B**  
**WGE Palmetto RSI**



March 14, 2011

Mr. Leo Francendese  
On-Scene Coordinator (OSC)  
U.S. Environmental Protection Agency  
61 Forsyth Street, SW 11<sup>th</sup> Floor  
Atlanta, Georgia 30303

**Subject: Removal Site Inspection, Revision 0**  
**Welch Group Environmental (WGE) Palmetto Parkway Site**  
**110 Palmetto Parkway, Belton, South Carolina**  
**EPA Contract No. EP-W-05-053**  
**Technical Direction Document (TDD) No. TNA-05-001-0129**

Dear Mr. Francendese:

The Oneida Total Integrated Enterprises (OTIE) Superfund Technical Assessment and Response Team (START) have prepared this Incident Response Letter Report detailing activities conducted in support of the On Scene Coordinator (OSC) for the U.S. Environmental Protection Agency (EPA). The initial scope of this activity was to conduct field investigation activities at the Welch Group Environmental (WGE) Palmetto Parkway site (site) in support of a removal site inspection that was part of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal site evaluation (RSE). The OSC directed WGE to conduct an emergency response action at the site thus expanding START's support role. WGE is a metal recovery company that recovered lead slugs and shell casings from gun/rifle ranges until it ceased operations in December 2010 at the request of the South Carolina Department of Health and Environmental Control (SCDHEC). The site is part of WGE's operations and was serving as storage.

START was specifically tasked to prepare a Health and Safety Plan; provide equipment including an X-Ray Fluorescence (XRF) instrument, and personnel to conduct inspection and support activities; document START and Responsible Party (RP)-lead response action site activities with photographs and written logbook notes; maintain the OSC webpage ([EPA OSC Webpage](#)) and prepare an Incident Response Letter Report summarizing the inspection and emergency response action activities. Attachment A of this Letter Report includes a topographical map ([Figure 1](#)), a site aerial photograph



([Figure 2](#)) and XRF screening location maps ([Figure 3](#)) and ([Figure 4](#)), respectively. The XRF decontamination test results are presented in Table 1 provided in Attachment B ([Pilot Test Data](#)). A photographic log of site activities is provided as Attachment C ([Photolog](#)) and a copy of the logbook notes are provided as Attachment D ([EPA Field Notes](#)).

### **Physical Location**

The site is located at 110 Palmetto Parkway in Belton, Anderson County, South Carolina. The geographic coordinates for the center of the property are Latitude 34.5228881° North and Longitude - 82.4942948° West ([Figure 1](#)). The site is comprised of a one-story warehouse building where WGE stored recovered lead slugs and shell casings from gun/rifle ranges. Several different clients lease space within the multi-use warehouse, but the building is not partitioned into individual units. Residential properties are located to the east, west, and south of the warehouse building. A large one-story warehouse building bounds the site to the north. ([Figure 2](#)) located in Attachment A show the location of the site and the surrounding areas.

### **Site Background**

This site is part of the WGE CERCLA response. SCDHEC notified EPA of the site while EPA was conducting Removal Site Evaluations (RSE) at two other WGE facilities located in Fair Play ([Fair Play Facility](#)) and Belton ([Belton Facility Webpage](#)), South Carolina. The WGE Palmetto Parkway site was part of WGE's operations and served as warehouse storage.

On February 7, 2011, EPA, START, property owner Cummings Gary, and site operator WGE conducted a site walk. During the site walk, WGE indicated that a box of range recovered material had overturned during cleanup and a metal shovel was used to recover the spilled material ([Access Agreement](#)). During recovery, the metal shovel scraped against the residual gun powder (green powder) covered concrete floor creating a spark. The ensuing fire partially damaged the building leaving burnt insulation and roofing material.

### **Field Investigation Activities and Results**

During the February 7, 2011 site walk, the EPA OSC tasked START to use an XRF to conduct in situ screening for metal concentrations at select locations of the building. START screened the floor and walls of areas where most site operation activities took place. WGE operations occupied approximately

4,000 square feet (ft<sup>2</sup>) of warehouse space. XRF readings for lead ranged from 408 parts per million (ppm) on the warehouse floor to 35,000 ppm along the building walls. Figure 3, provided in Attachment A, shows the building layout and the XRF lead readings (Figure 3).

Based on the XRF lead screening results, the EPA OSC determined that a release or substantial threat of release of a hazardous substance to the environment had occurred. The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare (Pol/Sitrep #1).

On February 10, 2011, a Notice of Federal Interest (NOFI) was issued to the site owner, Mr. Cummings Gary (NOFI). The OSC directed the site operator, WGE, to remediate the contaminated section of the warehouse. WGE's immediate goal was securing the facility from other facility personnel.

#### **RP-Lead RA Actions**

On February 17, 2011, WGE contractor was on site to cover the concrete flooring in designated areas with an industrial paper until remediation activities could occur. Safety barricades were used to delineate the exclusion zone (area where WGE stored the range recovered material) to prevent non response-related personnel from entering. WGE contractor submitted a Pilot Test Work Plan proposing decontamination of approximately 1,400 ft<sup>2</sup> of the warehouse floor to determine contaminant reduction concentrations below the EPA regional screening levels (RSL) of 400 ppm (Approved Work Plan).

On February 21 and 22, 2011, Phillips was on site to conduct the decontamination Pilot Test. Pilot testing was performed in a small area of the warehouse floor near the loading docks. Initial XRF readings for lead near the loading docks ranged from 1,399 to 1,570 ppm (Figure 3). The concrete near the loading docks was smooth in some areas and pitted and showing signs of deterioration in others. A detergent solution and water was used to clean the small area. The area was then rinsed with minimal water, vacuumed, and allowed to dry before confirmation screening using the XRF. A steel wire brush was used by WGE contractors in several areas to determine its effectiveness. Table 1, provided in Attachment B, presents the results of the February 21 and 22, 2011 Pilot Test XRF readings (Pilot Test Data). Figure 4, provided in Attachment A, shows the locations of the decontaminated areas (XRF Readings).

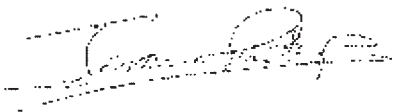
On February 28, 2011 through March 2, 2011, START observed WGE contractors continue with the decontamination Pilot testing activities (Revised RAWP). WGE contractors monitored air particulates while cleaning activities were being conducted (Air Monitoring Data). There were sections of the warehouse pathway where concentrations were still above 400 ppm. WGE contractors used a tavasco grinder on the floor and vacuumed dust with a high efficiency particulate air vacuum. The areas of the previously covered pathway were screened and readings were below 400 ppm.

**Planned RP-Lead RA Activities**

EPA tasked WGE with developing a Work Plan for remediating the remaining surface areas of concern in the warehouse while maintaining security to unqualified personnel for the area. WGE will submit the Work Plan to the EPA OSC for approval and it will be incorporated into an upcoming time critical removal action under an Administrative Order on Consent (AOC). Any further activities will be at the direction of the EPA OSC.

If you have any questions or comments regarding this letter report or require any additional information, please contact myself or Mr. Russell Henderson, START Assistant Program Manager, at 678-355-5550.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Partap", is written over a horizontal line.

Jerry Partap  
START Project Manager

CC: Katrina Jones, EPA Project Officer  
Darryl Walker, EPA Project Officer  
Greg Kowalski, START Program Manager  
Russell Henderson, START Assistant Program Manager  
START File

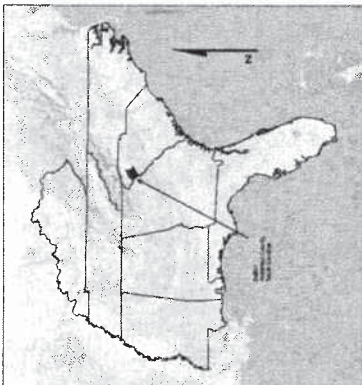
**ATTACHMENT C**  
**Figures**



# Legend

▲ Site Location

0 1,500 3,000  
Feet



WELCH GROUP ENVIRONMENTAL  
PALMETTO PARKWAY FACILITY,  
ANDERSON COUNTY,  
SOUTH CAROLINA  
TDD NO. TNA-05-003-0122

## FIGURE 1 TOPOGRAPHICAL MAP



United States Environmental Protection Agency

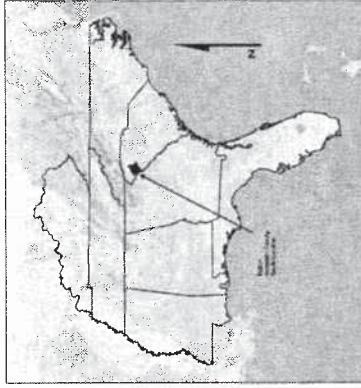




# Legend

▲ Site Location

Feet  
0 175 350



WELCH GROUP ENVIRONMENTAL  
PALMETTO PARKWAY FACILITY,  
ANDERSON COUNTY,  
SOUTH CAROLINA  
TDD NO. TNA-05-903-0122

FIGURE 2  
AERIAL MAP



United States Environmental Protection Agency



**ATTACHMENT D**  
**Table**



**TABLE 1**  
**WELCH GROUP ENVIRONMENTAL**  
**BELTON, ANDERSON COUNTY, SOUTH CAROLINA**  
**PILOT TEST DECONTAMINATION XRF SCREENING RESULTS**  
**FEBRUARY 21 22, 2011**

| Location      | Time     | Type     | Sample                | XRF Lead Soil Results (ppm) | +/- Error |
|---------------|----------|----------|-----------------------|-----------------------------|-----------|
| Decon Area 1  | 02/21/11 | Concrete | Loading Dock          | 452                         | 45        |
| Decon Area 1  | 02/21/11 | Concrete | Loading Dock          | 353                         | 38        |
| Decon Area 2  | 02/21/11 | Concrete | Loading Dock          | 854                         | 55        |
| Decon Area 2  | 02/22/11 | Concrete | Test Using Wire Brush | 268                         | 44        |
| Decon Area 3  | 02/21/11 | Concrete | Loading Dock          | 502                         | 48        |
| Decon Area 3  | 02/22/11 | Concrete | Test Using Wire Brush | 255                         | 35        |
| Decon Area 4  | 02/21/11 | Concrete | Loading Dock          | 319                         | 47        |
| Decon Area 5  | 02/21/11 | Concrete | Loading Dock          | 596                         | 57        |
| Decon Area 6  | 02/21/11 | Concrete | Loading Dock          | 399                         | 46        |
| Decon Area 7  | 02/22/11 | Concrete | After Second Cleaning | 2240                        | 85        |
| Decon Area 7  | 02/22/11 | Concrete | Test Using Wire Brush | 140                         | 37        |
| Decon Area 8  | 02/22/11 | Concrete | After Second Cleaning | 1982                        | 116       |
| Decon Area 8  | 02/22/11 | Concrete | After Third Cleaning  | 1065                        | 70        |
| Decon Area 8  | 02/22/11 | Concrete | Test Using Wire Brush | 412                         | 46        |
| Decon Area 9  | 02/22/11 | Concrete | After Second Cleaning | 569                         | 50        |
| Decon Area 10 | 02/22/11 | Concrete | After Second Cleaning | 499                         | 58        |

Notes:

ppm – parts per million

XRF – X-ray Fluorescence elemental detector

Results that are shaded are above the USEPA Removal Action Level for lead in residential soil (400 ppm).

**ATTACHMENT E**  
**Initial POLREP**

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** **POLREP #1**  
**Initial Emergency Response PRP Lead w EPA Oversight**  
**Welch Group Environmental (WGE) Palmetto Hwy**  
**B4F6**  
**Belton, SC**  
**Latitude: 34.5228881 Longitude: -82.4942948**

**To:**  
**From:** Leo Francendese, OSC  
**Date:** 2/14/2011  
**Reporting Period:** 2/07/2011 thru 2/14/2011

**1. Introduction**

**1.1 Background**

|                            |         |                                |                |
|----------------------------|---------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4F6    | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |         | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA  | <b>Response Type:</b>          | PRP Oversight  |
| <b>Response Lead:</b>      | EPA     | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  |         | <b>Start Date:</b>             | 2/7/2011       |
| <b>Demob Date:</b>         |         | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         |         | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |         | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |         | <b>Reimbursable Account #:</b> |                |

**1.1.1 Incident Category**

PRP Lead Emergency Response with EPA Oversight

**1.1.2 Site Description**

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a walkthru on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger of public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fairplay and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties is expected to be complete by the end of February. Further recommendations will be made at that



time.

#### **1.1.2.1 Location**

Belton, SC

#### **1.1.2.2 Description of Threat**

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fairplay and Belton.

### **2. Current Activities**

#### **2.1 Operations Section**

##### **2.1.2 Response Actions to Date**

The PRPs have been directed by the OSC to submit workplans for securing the facility, remediating the surfaces and providing a Health and Safety Plan.

The HASP has been submitted <http://www.epaosc.org/sites/6682/files/WGE%20H&S%20PALMETTO%20Site%20Rev.pdf> and approved as of February 14th. <http://www.epaosc.org/sites/6682/files/WP%20and%20HnS%20Approval%20Memo.pdf> In addition, the Removal Action Workplan (RAWP) was also submitted <http://www.epaosc.org/sites/6682/files/WelchGroup%20PalmettoHwy%20SOW%2002132011.pdf> and approved on February 14th.

The PRP and property owner have notified other users of the warehouse to stay out of the contaminated section of the warehouse and to use the alternate docking bay for operations until those areas have been remediated.

##### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

Access <http://www.epaosc.org/sites/6682/files/EPA%20form%20for%20Cummings%20Gary0001.pdf> has been secured and NOFI <http://www.epaosc.org/sites/6682/files/NOFI%20Final%20signed%20EPA%20form%20for%20Cummings%20Gary0001.pdf> CERCLA Cost Recovery and Legal support have been initiated. The EPA attorney will conduct an introductory conference call with the counsel for the PRPs on February 25th at 1000.

### **2.2 Planning Section**

#### **2.2.1.1 Planned Response Activities**

The PRP will conduct further securing of the site commencing on February 15th. Actual warehouse decontamination will likely commence the week of February 21st.

#### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

### **2.3 Logistics Section**

### **2.4 Finance Section**

### **2.5 Safety Officer**

### **2.6 Liaison Officer**

### **2.7 Information Officer**

### **3. Participating Entities**

#### **3.1 Unified Command**

#### **3.2 Cooperating and Assisting Agencies**

### **4. Personnel On Site**

1 EPA

2 START

### **5. Definition of Terms**

### **6. Additional sources of information**

- 6.1 Internet location of additional information/reports**
- 6.2 Reporting Schedule**
- 7. Situational Reference Materials**

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

IN THE MATTER OF:  
Welch Group Environmental Palmetto  
Belton, Anderson County, South Carolina

ADMINISTRATIVE SETTLEMENT  
AGREEMENT AND ORDER ON  
CONSENT FOR REMOVAL ACTION

Welch Group Environmental, LLC  
Respondent;

U.S. EPA Region 4  
Docket No. CERCLA-04-2011-3763

Gary Warehouse Services, LLC  
Respondent.

Proceeding Under Sections 104, 106(a), 107  
and 122 of the Comprehensive  
Environmental Response, Compensation,  
and Liability Act, as amended, 42 U.S.C. §§  
9604, 9606(a), 9607 and 9622

## **TABLE OF CONTENTS**

|         |  |    |
|---------|--|----|
| I.      | JURISDICTION AND GENERAL PROVISIONS .....  | 1  |
| II.     | PARTIES BOUND.....   | 1  |
| III.    | DEFINITIONS .....  | 2  |
| IV.     | FINDINGS OF FACT .....   | 4  |
| V.      | CONCLUSIONS OF LAW AND DETERMINATIONS .....                                      | 4  |
| VI.     | SETTLEMENT AGREEMENT AND ORDER.....  | 5  |
| VII.    | DESIGNATION OF CONTRACTOR, PROJECT COORDINATOR, AND ON-SCENE<br>COORDINATOR..... | 5  |
| VIII.   | WORK TO BE PERFORMED .....   | 7  |
| IX.     | SITE ACCESS .....  | 10 |
| X.      | ACCESS TO INFORMATION.....   | 11 |
| XI.     | RECORD RETENTION .....   | 11 |
| XII.    | COMPLIANCE WITH OTHER LAWS .....   | 12 |
| XIII.   | EMERGENCY RESPONSE AND NOTIFICATION OF RELEASES .....                            | 13 |
| XIV.    | AUTHORITY OF ON-SCENE COORDINATOR .....  | 13 |
| XV.     | PAYMENT OF RESPONSE COSTS.....   | 13 |
| XVI.    | DISPUTE RESOLUTION.....  | 17 |
| XVII.   | FORCE MAJEURE.....   | 17 |
| XVIII.  | STIPULATED PENALTIES.....  | 18 |
| XIX.    | COVENANT NOT TO SUE BY EPA.....  | 20 |
| XX.     | RESERVATIONS OF RIGHTS BY EPA .....  | 21 |
| XXI.    | COVENANT NOT TO SUE BY RESPONDENTS.....  | 22 |
| XXII.   | OTHER CLAIMS .....   | 23 |
| XXIII.  | CONTRIBUTION .....   | 23 |
| XXIV.   | INDEMNIFICATION.....   | 24 |
| XXV.    | INSURANCE .....  | 25 |
| XXVI.   | MODIFICATIONS.....   | 25 |
| XXVII.  | ADDITIONAL REMOVAL ACTIONS .....   | 26 |
| XXVIII. | NOTICE OF COMPLETION OF WORK .....   | 26 |
| XXIX.   | INTEGRATION/APPENDICES.....  | 26 |
| XXX.    | EFFECTIVE DATE .....   | 27 |



## **I. JURISDICTION AND GENERAL PROVISIONS**

1. This Administrative Settlement Agreement and Order on Consent (Settlement Agreement) is entered into voluntarily by the United States Environmental Protection Agency (EPA) and Welch Group Environmental, LLC (WGE) and Gary Warehouse Services, LLC (GWS), hereafter referred to as "Respondent." This Settlement Agreement provides for the performance of a removal action by Respondents and the reimbursement of certain response costs incurred by the United States at or in connection with the "Welch Group Environmental Palmetto Site" (the Site) generally located at 110 Palmetto Parkway in Belton, Anderson County, South Carolina 29627.

2. This Settlement Agreement is issued under the authority vested in the President of the United States by Sections 104, 106(a), 107 and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §§ 9604, 9606(a), 9607 and 9622, as amended (CERCLA).

3. EPA has notified the State of South Carolina (the State) of this action pursuant to Section 106(a) of CERCLA, 42 U.S.C. § 9606(a).

4. EPA and Respondents recognize that this Settlement Agreement has been negotiated in good faith and that the actions undertaken by Respondents in accordance with this Settlement Agreement do not constitute an admission of any liability. Respondents do not admit, and retain the right to controvert in any subsequent proceedings other than proceedings to implement or enforce this Settlement Agreement, the validity of the findings of facts, conclusions of law, and determinations in Sections IV and V of this Settlement Agreement. Respondents agree to comply with and be bound by the terms of this Settlement Agreement and further agree that they will not contest the basis or validity of this Settlement Agreement or its terms.

## **II. PARTIES BOUND**

5. This Settlement Agreement applies to and is binding upon EPA and upon Respondents and their successors and assigns. Any change in ownership or corporate status of a Respondent including, but not limited to, any transfer of assets or real or personal property shall not alter such Respondent's responsibilities under this Settlement Agreement.

6. Respondents are jointly and severally liable for carrying out all activities required by this Settlement Agreement. In the event of the insolvency or other failure of any one or more Respondents to implement the requirements of this Settlement Agreement, the remaining Respondents shall complete all such requirements.

7. Respondents shall ensure that their contractors, subcontractors, and representatives receive a copy of this Settlement Agreement and comply with this Settlement Agreement. Respondents shall be responsible for any noncompliance with this Settlement Agreement.

### **III. DEFINITIONS**

8. Unless otherwise expressly provided in this Settlement Agreement, terms used in this Settlement Agreement which are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in CERCLA or in such regulations. Whenever terms listed below are used in this Settlement Agreement or in the appendices attached hereto and incorporated hereunder, the following definitions shall apply:

a. "Action Memorandum" shall mean the EPA Action Memorandum relating to the Site signed by the Regional Administrator, EPA Region 4, or his/her delegate, and all attachments thereto. The Action Memorandum is attached as Appendix D.

b. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601, *et seq.*

c. "Day" shall mean a calendar day. In computing any period of time under this Settlement Agreement, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the close of business of the next working day.

d. "Effective Date" shall be the effective date of this Settlement Agreement as provided in Section XXX.

e. "EPA" shall mean the United States Environmental Protection Agency and any successor departments or agencies of the United States.

f. "SCDHEC" shall mean the South Carolina Department of Environment and Health and Environmental Control and any successor departments or agencies of the State.

g. "Future Response Costs" shall mean all costs, including, but not limited to, direct and indirect costs, that the United States incurs after the Effective Date in reviewing or developing plans, reports and other items pursuant to this Settlement Agreement, verifying the Work, or otherwise implementing, overseeing, or enforcing this Settlement Agreement, including but not limited to, payroll costs, contractor costs, travel costs, laboratory costs, the costs incurred pursuant to Paragraph 26 (costs and attorneys fees and any monies paid to secure access, including the amount of just compensation), Paragraph 36 (emergency response), and Paragraph 62 (work takeover).

h. "Interest" shall mean interest at the rate specified for interest on investments of the EPA Hazardous Substance Superfund established by 26 U.S.C. § 9507, compounded annually on October 1 of each year, in accordance with 42 U.S.C. § 9607(a). The applicable rate of interest shall be the rate in effect at the time the interest accrues. The rate of interest is subject to change on October 1 of each year.

i. “National Contingency Plan” or “NCP” shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, codified at 40 C.F.R. Part 300, and any amendments thereto.

j. “Settlement Agreement” shall mean this Administrative Settlement Agreement and Order on Consent and all appendices attached hereto (listed in Section XXIX). In the event of conflict between this Settlement Agreement and any appendix, this Settlement Agreement shall control.

k. “Paragraph” shall mean a portion of this Settlement Agreement identified by an Arabic numeral.

l. “Parties” shall mean EPA and Respondents.

m. “Past Response Costs” shall mean all costs, including, but not limited to, direct and indirect costs, that the United States paid at or in connection with the Site through the Effective Date.

n. “RCRA” shall mean the Solid Waste Disposal Act, as amended, 42 U.S.C. §§ 6901, *et seq.* (also known as the Resource Conservation and Recovery Act).

o. “Respondents” shall mean Welch Group Environmental, LLC and Gary Warehouse Services, LLC.

p. “Section” shall mean a portion of this Settlement Agreement identified by a Roman numeral.

q. “Site” shall mean the Welch Group Environmental Palmetto Site located at 110 Palmetto Parkway, Belton, Anderson County, South Carolina, on which WGE operated its business, and the areal extent of any contamination.

r. “State” shall mean the State of South Carolina.

s. “Statement of Work” or “SOW” shall mean the statement of work for implementation of the removal action, as set forth in Appendix A to this Settlement Agreement, and any modifications made thereto in accordance with this Settlement Agreement.

t. “Waste Material” shall mean 1) any “hazardous substance” under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14); 2) any pollutant or contaminant under Section 101(33) of CERCLA, 42 U.S.C. § 9601(33); and 3) any “solid waste” under Section 1004(27) of RCRA, 42 U.S.C. § 6903(27) that is not considered usable product.

u. “Work” shall mean all activities Respondents are required to perform under this Settlement Agreement.

#### **IV. FINDINGS OF FACT**

9. The Site is located at 110 Palmetto Parkway, Belton, Anderson County, South Carolina 29627 and is comprised of a one-story, multi-use warehouse building. The Site is owned by GWS and is leased to Welch Group Environmental, LLC (WGE). The South Carolina Department of Health and Environmental Control (SCDHEC) notified EPA of the Site while EPA was conducting Removal Site Evaluations (RSE) at two other facilities where WGE operated in Fair Play and Anderson, South Carolina.

10. WGE used the Site to store recovered lead slugs and shell casings from gun and rifle ranges in the operation of a munitions recovery business. WGE operations generally involve smelting and molding of lead and other metals, such as copper, recovered from both indoor and outdoor shooting ranges across the United States. On December 2, 2010 SCDHEC ordered WGE to cease operations due to permit violations. WGE ceased operations at all three sites in South Carolina.

11. On February 7, 2011, WGE informed EPA that a box of range recovered material had spilled during cleanup and a metal shovel was used to recover the spill material. The metal shovel sparked against residual gun powder on the concrete floor and created a spark. The spark resulted in a fire that partially damaged the building. EPA conducted screening for metal concentrations on the floor and wall areas where most Site operations took place and found that a release of lead exists at high concentrations at or near the surface. These concentrations present an imminent and substantial threat to public health and welfare. Under EPA oversight, on February 10, 2011, WGE and Cummings Gary began securing the Site. The emergency removal action is transitioning into a time-critical removal action, subject to the terms of the Administrative Order on Consent.

#### **V. CONCLUSIONS OF LAW AND DETERMINATIONS**

12. Based on the Findings of Fact set forth above, and the Administrative Record supporting this removal action, EPA has determined that:

a. The Welch Group Environmental Palmetto Site is a “facility” as defined by Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

b. The contamination found at the Site, as identified in the Findings of Fact above, includes a “hazardous substance” as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

c. Each Respondent is a “person” as defined by Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

d. Each Respondent is a responsible party under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), and is jointly and severally liable for performance of response action and for response costs incurred and to be incurred at the Site.

- i. Respondent Gary Warehouse Services, LLC is an “owner” of the facility, as defined by Section 101(20)(A) of CERCLA, 42 U.S.C. § 9601(20)(A), and within the meaning of Section 107(a)(1) of CERCLA, 42 U.S.C. § 9607(a)(1).
- iii. Respondent Welch Group Environmental, LLC is an “operator” of the facility at the time of disposal of hazardous substances at the facility, as defined by Section 101(20)(A) of CERCLA, 42 U.S.C. § 9601(20)(A), and within the meaning of Section 107(a)(2) of CERCLA, 42 U.S.C. § 9607(a)(2).

e. The conditions described in Paragraphs 9-11 of the Findings of Fact above constitute an actual or threatened of “release” of a hazardous substance from the facility as defined by Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

f. The removal action required by this Settlement Agreement is necessary to protect the public health, welfare, or the environment and, if carried out in compliance with the terms of this Settlement Agreement, will be consistent with the NCP, as provided in Section 300.700(c)(3)(ii) of the NCP.

## **VI. SETTLEMENT AGREEMENT AND ORDER**

Based upon the foregoing Findings of Fact, Conclusions of Law, Determinations, and the Administrative Record for this Site, it is hereby Ordered and Agreed that Respondents shall comply with all provisions of this Settlement Agreement, including, but not limited to, all attachments to this Settlement Agreement and all documents incorporated by reference into this Settlement Agreement.

## **VII. DESIGNATION OF CONTRACTOR, PROJECT COORDINATOR, AND ON-SCENE COORDINATOR**

13. Respondents have notified EPA that Act Environmental Services (ACT) will serve as Respondents’ contractor at the Site. EPA has approved the use of such contractor. Respondents shall notify EPA of the name(s) and qualification(s) of any other contractor(s) or subcontractor(s) retained to perform the Work at least five (5) days prior to commencement of such Work. EPA retains the right to disapprove of any or all of the contractors and/or



subcontractors retained by Respondents. If EPA disapproves of a selected contractor, Respondents shall retain a different contractor and shall notify EPA of that contractor's name and qualifications within five (5) days of EPA's disapproval. EPA may, at its discretion, require the proposed contractor to demonstrate compliance with ANSI/ASQC E-4-1994, "Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs" (American National Standard, January 5, 1995), by submitting a copy of the proposed contractor's Quality Management Plan (QMP). The QMP should be prepared in accordance with "EPA Requirements for Quality Management Plans (QA/R-2)" (EPA/240/B0-1/002), or equivalent documentation as required by EPA.

14. Respondents have designated Mick Robarts of ACT as the Project Coordinator who shall be responsible for administration of all actions by Respondents required by this Settlement Agreement and shall submit to EPA the designated Project Coordinator's name, address, telephone number, and qualifications. To the greatest extent possible, the Project Coordinator shall be present on Site or readily available during Site work. EPA retains the right to disapprove of the designated Project Coordinator. If, at any time, EPA disapproves of the designated Project Coordinator, Respondents shall retain a different Project Coordinator and shall notify EPA of that person's name, address, telephone number, and qualifications within five (5) days following EPA's disapproval. Receipt by Respondents' Project Coordinator of any notice or communication from EPA relating to this Settlement Agreement shall constitute receipt by all Respondents.

15. EPA has designated Leo Francendese of the Emergency and Enforcement Response Branch, Region 4, as its On-Scene Coordinator (OSC). Except as otherwise provided in this Settlement Agreement, Respondents shall direct all submissions required by this Settlement Agreement to the OSC below. Submissions may be made via email.

Leo Francendese  
Federal On-Scene Coordinator  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
(404) 562-8772 (work); (404) 606-2223 (cell)  
[francendese.leo@epa.gov](mailto:francendese.leo@epa.gov)

16. EPA and Respondents shall have the right, subject to Paragraph 15, to change their respective designated OSC or Project Coordinator. Respondents shall notify EPA five (5) days before such a change is made. The initial notification may be made orally, but shall be promptly followed by a written notice.

## **VIII. WORK TO BE PERFORMED**

17. Respondents shall perform the following work to implement EPA's Action Memorandum:

- a. Secure to the section of the warehouse that has high lead concentration dust in order to reduce the direct exposure pathways to nearby human populations and to stop off-site migration of the lead dust;
- b. Remove contaminated dust from the Site accompanied by appropriate monitoring and best management practices to ensure protection of human health and environment;
- c. Implement the following approved plans:
  - i. Health and Safety Plan;
  - ii. Dust Monitoring and Management Plan;
  - iii. Decontamination Plan; and
  - iv. Waste Disposal Plan.

### **18. Work Plan and Implementation.**

a. Respondents have submitted, and EPA has approved, a Work Plan for performing the removal action generally described in Paragraph 17 above. The Work Plan provides a description of, and an expeditious schedule for, the actions required by this Settlement Agreement.

b. Respondents shall implement the approved Work Plan in accordance with the schedule approved by EPA. EPA may require modification to the Work Plan as it is implemented. If EPA requires modifications to the Work Plan, Respondents shall submit a revised draft Work Plan within 10 days of receipt of EPA's notification of the required modifications. Once approved, or approved with modifications, the Work Plan, the schedule, and any subsequent modifications shall be incorporated into and become fully enforceable under this Settlement Agreement.

c. Respondents shall not commence any Work except in conformance with the terms of this Settlement Agreement.

19. Health and Safety Plan. Respondents have submitted a Health and Safety Plan, which have been reviewed by EPA to ensure the protection of the public health and safety during performance of on-Site work under this Settlement Agreement. The plan complies with all currently applicable Occupational Safety and Health Administration (OSHA) regulations found at 29 C.F.R. Part 1910, and includes contingency planning. Respondents shall implement the plan during the pendency of the removal action.

20. Quality Assurance and Sampling.

a. All sampling and analyses performed pursuant to this Settlement Agreement shall conform to EPA direction, approval, and guidance regarding sampling, quality assurance/quality control (QA/QC), data validation, and chain of custody procedures. Respondents shall ensure that the laboratory used to perform the analyses participates in a QA/QC program that complies with the appropriate EPA guidance. Respondents shall follow, as appropriate, "Quality Assurance/Quality Control Guidance for Removal Activities: Sampling QA/QC Plan and Data Validation Procedures" (OSWER Directive No. 9360.4-01, April 1, 1990), as guidance for QA/QC and sampling. Respondents shall only use laboratories that have a documented Quality System that complies with ANSI/ASQC E-4 1994, "Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs" (American National Standard, January 5, 1995), and "EPA Requirements for Quality Management Plans (QA/R-2) (EPA/240/B-01/002, March 2001; reissued May 2006)," or equivalent documentation as determined by EPA. EPA may consider laboratories accredited under the National Environmental Laboratory Accreditation Program (NELAP) as meeting the Quality System requirements.

b. Upon request by EPA, Respondents shall have such a laboratory analyze samples submitted by EPA for QA monitoring. Respondents shall provide to EPA the QA/QC procedures followed by all sampling teams and laboratories performing data collection and/or analysis.

c. Upon request by EPA, Respondents shall allow EPA or its authorized representatives to take split and/or duplicate samples. Respondents shall notify EPA not less than five (5) days in advance of any sample collection activity, unless shorter notice is agreed to by EPA. EPA shall have the right to take any additional samples that EPA deems necessary. Upon request, EPA shall allow Respondents to take split or duplicate samples of any samples it takes as part of its oversight of Respondents' implementation of the Work.

21. Post-Removal Site Control. In accordance with the Work Plan schedule, or as otherwise directed by EPA, Respondents shall submit a proposal for post-removal site control consistent with Section 300.415(I) of the NCP and OSWER Directive No. 9360.2-02. Upon EPA approval, Respondents shall implement such controls and shall provide EPA with documentation of all post-removal site control arrangements.

22. Reporting.

a. Respondents shall submit a written progress report to EPA concerning actions undertaken pursuant to this Settlement Agreement every 7th day after the date of receipt of EPA's approval of the Work Plan until termination of this Settlement Agreement, unless otherwise directed in writing by the OSC. These reports shall describe all significant developments during the preceding period, including the actions performed and any problems encountered, analytical

data received during the reporting period, and the developments anticipated during the next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems.

b. Respondents shall submit electronic copies of all plans, reports or other submissions required by this Settlement Agreement or any approved work plan.

c. Respondents who own or control property at the Site shall, at least 30 days prior to the conveyance of any interest in real property at the Site, give written notice to the transferee that the property is subject to this Settlement Agreement and written notice to EPA and the State of the proposed conveyance, including the name and address of the transferee. Respondents who own or control property at the Site also agree to require that their successors comply with the immediately proceeding sentence and Sections IX (Site Access) and X (Access to Information).

23. Final Report. Within sixty (60) days after completion of all Work required by this Settlement Agreement, Respondents shall submit for EPA review and approval a final report summarizing the actions taken to comply with this Settlement Agreement. The final report shall conform, at a minimum, with the requirements set forth in Section 300.165 of the NCP entitled "OSC Reports." The final report shall include a good faith estimate of total costs or a statement of actual costs incurred in complying with the Settlement Agreement, a listing of quantities and types of materials removed off-Site or handled on-Site, a discussion of removal and disposal options considered for those materials, a listing of the ultimate destination(s) of those materials, a presentation of the analytical results of all sampling and analyses performed, and accompanying appendices containing all relevant documentation generated during the removal action (*e.g.*, manifests, invoices, bills, contracts, and permits). The final report shall also include the following certification signed by a person who supervised or directed the preparation of that report:

"Under penalty of law, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the report, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

24. Off-Site Shipments.

a. Respondents shall, prior to any off-Site shipment of Waste Material from the Site to an out-of-state waste management facility, provide written notification of such shipment of Waste Material to the appropriate state environmental official in the receiving facility's state and to the On-Scene Coordinator. However, this notification requirement shall not apply to any off-Site shipments when the total volume of all such shipments will not exceed 10 cubic yards.

i. Respondents shall include in the written notification the following information: 1) the name and location of the facility to which the Waste Material is to be



shipped; 2) the type and quantity of the Waste Material to be shipped; 3) the expected schedule for the shipment of the Waste Material; and 4) the method of transportation. Respondents shall notify the state in which the planned receiving facility is located of major changes in the shipment plan, such as a decision to ship the Waste Material to another facility within the same state, or to a facility in another state.

ii. The identity of the receiving facility and state will be determined by Respondents following the award of the contract for the removal action. Respondents shall provide the information required by Paragraph 21(a) and 21(b) as soon as practicable after the award of the contract and before the Waste Material is actually shipped.

b. Before shipping any hazardous substances, pollutants, or contaminants from the Site to an off-site location, Respondents shall obtain EPA's certification that the proposed receiving facility is operating in compliance with the requirements of CERCLA Section 121(d)(3), 42 U.S.C. § 9621(d)(3), and 40 C.F.R. § 300.440. Respondents shall only send hazardous substances, pollutants, or contaminants from the Site to an off-site facility that complies with the requirements of the statutory provision and regulation cited in the preceding sentence.

## **IX. SITE ACCESS**

25. If the Site, or any other property where access is needed to implement this Settlement Agreement, is owned or controlled by any of the Respondents, such Respondents shall, commencing on the Effective Date, provide EPA, the State, and their representatives, including contractors, with access at all reasonable times to the Site, or such other property, for the purpose of conducting any activity related to this Settlement Agreement.

26. Where any action under this Settlement Agreement is to be performed in areas owned by or in possession of someone other than Respondents, Respondents shall use their best efforts to obtain all necessary access agreements within seven (7) days after the Effective Date, or as otherwise specified in writing by the OSC. Respondents shall immediately notify EPA if after using their best efforts they are unable to obtain such agreements. For purposes of this Paragraph, "best efforts" includes the payment of reasonable sums of money in consideration of access. Respondents shall describe in writing their efforts to obtain access. EPA may then assist Respondents in gaining access, to the extent necessary to effectuate the response actions described in this Settlement Agreement, using such means as EPA deems appropriate. Respondents shall reimburse EPA for all costs and attorney's fees incurred by the United States in obtaining such access, in accordance with the procedures in Section XV (Payment of Response Costs).

27. Notwithstanding any provision of this Settlement Agreement, EPA and the State retain all of their access authorities and rights as well as all of their rights to require land/water use restrictions, including enforcement authorities related thereto, under CERCLA, RCRA, and any other applicable statutes or regulations.



## **X. ACCESS TO INFORMATION**

28. Respondents shall provide to EPA and the State, upon request, copies of all documents and information within their possession or control or that of their contractors or agents relating to activities at the Site or to the implementation of this Settlement Agreement, including, but not limited to, sampling, analysis, chain of custody records, manifests, trucking logs, receipts, reports, sample traffic routing, correspondence, or other documents or information related to the Work. Respondents shall also make available to EPA and the State, for purposes of investigation, information gathering, or testimony, their employees, agents, or representatives with knowledge of relevant facts concerning the performance of the Work.

29. Respondents may assert business confidentiality claims covering part or all of the documents or information submitted to EPA and the State under this Settlement Agreement to the extent permitted by and in accordance with Section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7), and 40 C.F.R. § 2.203(b). Documents or information determined to be confidential by EPA will be afforded the protection specified in 40 C.F.R. Part 2, Subpart B. If no claim of confidentiality accompanies documents or information when they are submitted to EPA and the State, or if EPA has notified Respondents that the documents or information are not confidential under the standards of Section 104(e)(7) of CERCLA or 40 C.F.R. Part 2, Subpart B, the public may be given access to such documents or information without further notice to Respondents.

30. Respondents may assert that certain documents, records and other information are privileged under the attorney-client privilege or any other privilege recognized by federal law. If the Respondents assert such a privilege in lieu of providing documents, they shall provide EPA and the State with the following: 1) the title of the document, record, or information; 2) the date of the document, record, or information; 3) the name and title of the author of the document, record, or information; 4) the name and title of each addressee and recipient; 5) a description of the contents of the document, record, or information; and 6) the privilege asserted by Respondents. However, no documents, reports or other information created or generated pursuant to the requirements of this Settlement Agreement shall be withheld on the grounds that they are privileged or confidential.

31. No claim of privilege or confidentiality shall be made with respect to any data, including, but not limited to, all sampling, analytical, monitoring, hydrogeologic, scientific, chemical, or engineering data, or any other documents or information evidencing conditions at or around the Site.

## **XI. RECORD RETENTION**

32. Until 10 years after Respondents' receipt of EPA's notification pursuant to Section XXVII (Notice of Completion of Work), each Respondent shall preserve and retain all non-identical copies of records and documents (including records or documents in electronic form)

now in its possession or control or which come into its possession or control that relate in any manner to the performance of the Work or the liability of any person under CERCLA with respect to the Site, regardless of any corporate retention policy to the contrary. Until 10 years after Respondents' receipt of EPA's notification pursuant to Section XXVII (Notice of Completion of Work), Respondents shall also instruct their contractors and agents to preserve all documents, records, and information of whatever kind, nature or description relating to performance of the Work.

33. At the conclusion of this document retention period, Respondents shall notify EPA and the State at least 90 days prior to the destruction of any such records or documents, and, upon request by EPA or the State, Respondents shall deliver any such records or documents to EPA or the State. Respondents may assert that certain documents, records and other information are privileged under the attorney-client privilege or any other privilege recognized by federal law. If Respondents assert such a privilege, they shall provide EPA or the State with the following: 1) the title of the document, record, or information; 2) the date of the document, record, or information; 3) the name and title of the author of the document, record, or information; 4) the name and title of each addressee and recipient; 5) a description of the subject of the document, record, or information; and 6) the privilege asserted by Respondents. However, no documents, reports or other information created or generated pursuant to the requirements of this Settlement Agreement shall be withheld on the grounds that they are privileged or confidential.

34. Each Respondent hereby certifies individually that to the best of its knowledge and belief, after thorough inquiry, it has not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents or other information (other than identical copies) relating to its potential liability regarding the Site since the first notification of potential liability by EPA or the State or the filing of suit against it regarding the Site and that it has fully complied with any and all EPA requests for information pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) and 9622(e), and Section 3007 of RCRA, 42 U.S.C. § 6927.

## **XII. COMPLIANCE WITH OTHER LAWS**

35. Respondents shall perform all actions required pursuant to this Settlement Agreement in accordance with all applicable state and federal laws and regulations except as provided in Section 121(e) of CERCLA, 42 U.S.C. § 6921(e), and 40 C.F.R. §§ 300.400(e) and 300.415(j). In accordance with 40 C.F.R. § 300.415(j), all on-Site actions required pursuant to this Settlement Agreement shall, to the extent practicable, as determined by EPA, considering the exigencies of the situation, attain applicable or relevant and appropriate requirements (ARARs) under federal environmental or state environmental or facility siting laws. Respondents shall identify ARARs in the Work Plan subject to EPA approval.

### **XIII. EMERGENCY RESPONSE AND NOTIFICATION OF RELEASES**

36. In the event of any action or occurrence during performance of the Work which causes or threatens a release of Waste Material from the Site that constitutes an emergency situation or may present an immediate threat to public health or welfare or the environment, Respondents shall immediately take all appropriate action. Respondents shall take these actions in accordance with all applicable provisions of this Settlement Agreement, including, but not limited to, the Health and Safety Plan, in order to prevent, abate or minimize such release or endangerment caused or threatened by the release. Respondents shall also immediately notify the OSC or, in the event of his/her unavailability, the Regional Duty Officer at (404) 562-8700, of the incident or Site conditions. In the event that Respondents fail to take appropriate response action as required by this Paragraph, and EPA takes such action instead, Respondents shall reimburse EPA all costs of the response action not inconsistent with the NCP pursuant to Section XV (Payment of Response Costs).

37. In addition, in the event of any release of a hazardous substance from the Site, Respondents shall immediately notify the OSC at 404-606-2223 and the National Response Center at (800) 424-8802. Respondents shall submit a written report to EPA within 7 days after each release, setting forth the events that occurred and the measures taken or to be taken to mitigate any release or endangerment caused or threatened by the release and to prevent the reoccurrence of such a release. This reporting requirement is in addition to, and not in lieu of, reporting under Section 103(c) of CERCLA, 42 U.S.C. § 9603(c), and Section 304 of the Emergency Planning and Community Right-To-Know Act of 1986, 42 U.S.C. § 11004, *et seq.*

### **XIV. AUTHORITY OF ON-SCENE COORDINATOR**

38. The OSC shall be responsible for overseeing Respondents' implementation of this Settlement Agreement. The OSC shall have the authority vested in an OSC by the NCP, including the authority to halt, conduct, or direct any Work required by this Settlement Agreement, or to direct any other removal action undertaken at the Site. Absence of the OSC from the Site shall not be cause for stoppage of work unless specifically directed by the OSC.

### **XV. PAYMENT OF RESPONSE COSTS**

#### **39. Payment for Past Response Costs.**

a. EPA shall issue a demand to Respondents for the payment of Past Response Costs no earlier than 120 days following the completion of the Work at this Site as determined by the OSC. Within 60 days after Respondents' receipt from EPA of a demand for payment, Respondents shall pay a minimum of \$15,000 per calendar month to EPA until EPA's cumulative Past and Future Response Costs are paid in full. Payment shall be made to EPA by Electronic Funds Transfer (EFT) in accordance with current EFT procedures to be provided to Respondents by EPA Region 4, and shall be accompanied by a statement identifying the name and address of

the party making payment, the Site name, the EPA Region and Site/Spill ID Number B4F6, and the EPA docket number for this action to:

Federal Reserve Bank of New York  
ABA: 021030004  
Account Number: 68010727  
SWIFT address: FRNYUS33

33 Liberty Street  
New York, New York 10045  
Field Tag 4200 of the Fedwire message should read: "D 68010727 Environmental Protection Agency"

b. At the time of payment, Respondents shall send notice that such payment has been made by email to [acctsreceivable.cinwd@epa.gov](mailto:acctsreceivable.cinwd@epa.gov), or by mail to:

EPA Cincinnati Finance Office  
26 Martin Luther King Drive  
Cincinnati, Ohio 45268

with a copy to:

Leo Francendese  
Federal On-Scene Coordinator  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
[francendese.leo@epa.gov](mailto:francendese.leo@epa.gov)

and a copy to:

Paula V. Painter  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
[painter.paula@epa.gov](mailto:painter.paula@epa.gov)

c. The total amount to be paid by Respondents pursuant to Paragraph 36(a) shall be deposited by EPA in the EPA Hazardous Substance Superfund.

40. Payments for Future Response Costs.

a. EPA shall issue a bill(s) to Respondents for the payment of Future Response Costs no earlier than 120 days following the completion of the Work at this Site as determined by the OSC. Within 60 days after Respondents' receipt from EPA of a demand for payment, Respondents shall pay a minimum of \$15,000 per calendar month to EPA until EPA's cumulative Future and Past Response Costs are paid in full. Respondents shall pay EPA all Future Response Costs not inconsistent with the NCP. The bill(s) requiring payment will include a SCORPIOS Report, which includes direct and indirect costs incurred by EPA and its contractors. Respondents shall pay a minimum of \$15,000 per calendar month until EPA's cumulative Future and Past Response Costs are paid in full, except as otherwise provided in Paragraph 42 of this Settlement Agreement.

b. Respondents shall make all payments required by this Paragraph to EPA by Electronic Funds Transfer (EFT) in accordance with current EFT procedures to be provided to Respondents by EPA Region 4, and shall be accompanied by a statement identifying the name and address of the party making payment, the Site name, the EPA Region and Site/Spill ID Number B4F6, and the EPA docket number for this action to:

Federal Reserve Bank of New York  
ABA: 021030004  
Account Number: 68010727  
SWIFT address: FRNYUS33  
33 Liberty Street  
New York, New York 10045  
Field Tag 4200 of the Fedwire message should read: "D 68010727 Environmental Protection Agency"

c. At the time of payment, Respondents shall send notice that payment has been made to by email to [acctsreceivable.cinwd@epa.gov](mailto:acctsreceivable.cinwd@epa.gov), or by mail to:

EPA Cincinnati Finance Office  
26 Martin Luther King Drive  
Cincinnati, Ohio 45268

with a copy to:

Leo Francendese  
Federal On-Scene Coordinator  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
[francendese.leo@epa.gov](mailto:francendese.leo@epa.gov)



and a copy to:

Paula V. Painter  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
[painter.paula@epa.gov](mailto:painter.paula@epa.gov)

d. The total amount to be paid by Respondents pursuant to Paragraph 40(a) shall be deposited by EPA into the EPA Hazardous Substance Superfund.

41. In the event that the payment for Past or Future Response Costs is not made within 60 days of the Demand for Payment, Respondents shall pay Interest on each unpaid \$15,000 required payment. The Interest on Past Response Costs and Future Response Costs shall begin to accrue on the due date of payment and shall continue to accrue until the date of payment. Payments of Interest made under this Paragraph shall be in addition to such other remedies or sanctions available to the United States by virtue of Respondents' failure to make timely payments under this Section, including but not limited to, payment of stipulated penalties pursuant to Section XVIII.

42. Respondents may contest payment of any Future Response Costs billed under Paragraph 40 if they determine that EPA has made a mathematical error, or if they believe EPA incurred excess costs as a direct result of an EPA action that was inconsistent with the NCP. Such objection shall be made in writing within 30 days of receipt of the bill and must be sent to Paula Painter. Any such objection shall specifically identify the contested Future Response Costs and the basis for objection. In the event of an objection, Respondents shall within the 30-day period pay all uncontested Future Response Costs to EPA in the manner described in Paragraph 40. Simultaneously, Respondents shall establish an interest-bearing escrow account in a federally-insured bank duly chartered in the State of South Carolina and remit to that escrow account funds equivalent to the amount of the contested Future Response Costs. Respondents shall send to Paula Painter and the OSC a copy of the transmittal letter and check paying the uncontested Future Response Costs, and a copy of the correspondence that establishes and funds the escrow account, including, but not limited to, information containing the identity of the bank and bank account under which the escrow account is established as well as a bank statement showing the initial balance of the escrow account. Simultaneously with establishment of the escrow account, Respondents shall initiate the Dispute Resolution procedures in Section XVI (Dispute Resolution). If EPA prevails in the dispute, within 5 days of the resolution of the dispute, Respondents shall pay the sums due (with accrued interest) to EPA in the manner described in Paragraph 40. If Respondents prevail concerning any aspect of the contested costs, Respondents shall pay that portion of the costs (plus associated accrued interest) for which they did not prevail to EPA in the manner described in Paragraph 40. Respondents shall be disbursed any balance of the escrow account. The dispute resolution procedures set forth in this Paragraph in conjunction with the procedures set forth in Section XVI (Dispute Resolution) shall be the exclusive mechanisms for

resolving disputes regarding Respondents' obligation to reimburse EPA for its Future Response Costs.

## **XVI. DISPUTE RESOLUTION**

43. Unless otherwise expressly provided for in this Settlement Agreement, the dispute resolution procedures of this Section shall be the exclusive mechanism for resolving disputes arising under this Settlement Agreement. The Parties shall attempt to resolve any disagreements concerning this Settlement Agreement expeditiously and informally.

44. If Respondents object to any EPA action taken pursuant to this Settlement Agreement, including billings for Future Response Costs, they shall notify EPA in writing of their objection(s) within fourteen (14) days of such action, unless the objection(s) has/have been resolved informally. EPA and Respondents shall have fourteen (14) days from EPA's receipt of Respondents' written objection(s) to resolve the dispute through formal negotiations (the Negotiation Period). The Negotiation Period may be extended at the sole discretion of EPA.

45. Any agreement reached by the parties pursuant to this Section shall be in writing and shall, upon signature by both parties, be incorporated into and become an enforceable part of this Settlement Agreement. If the Parties are unable to reach an agreement within the Negotiation Period, an EPA management official at the Superfund Division Director level or higher will issue a written decision on the dispute to Respondents. EPA's decision shall be incorporated into and become an enforceable part of this Settlement Agreement. Respondents' obligations under this Settlement Agreement shall not be tolled by submission of any objection for dispute resolution under this Section. Following resolution of the dispute, as provided by this Section, Respondents shall fulfill the requirement that was the subject of the dispute in accordance with the agreement reached or with EPA's decision, whichever occurs.

## **XVII. FORCE MAJEURE**

46. Respondents agree to perform all requirements of this Settlement Agreement within the time limits established under this Settlement Agreement, unless the performance is delayed by a *force majeure*. For purposes of this Settlement Agreement, a *force majeure* is defined as any event arising from causes beyond the control of Respondents, or of any entity controlled by Respondents, including but not limited to their contractors and subcontractors, which delays or prevents performance of any obligation under this Settlement Agreement despite Respondents' best efforts to fulfill the obligation. *Force majeure* does not include financial inability to complete the Work, or increased cost of performance.

47. If any event occurs or has occurred that may delay the performance of any obligation under this Settlement Agreement, whether or not caused by a *force majeure* event, Respondents shall notify EPA orally within twenty-four hours of when Respondents first knew that the event might cause a delay. Within seven (7) days thereafter, Respondents shall provide to EPA in

writing an explanation and description of the reasons for the delay; the anticipated duration of the delay; all actions taken or to be taken to prevent or minimize the delay; a schedule for implementation of any measures to be taken to prevent or mitigate the delay or the effect of the delay; Respondents' rationale for attributing such delay to a *force majeure* event if they intend to assert such a claim; and a statement as to whether, in the opinion of Respondents, such event may cause or contribute to an endangerment to public health, welfare or the environment. Failure to comply with the above requirements shall preclude Respondents from asserting any claim of *force majeure* for that event for the period of time of such failure to comply and for any additional delay caused by such failure.

48. If EPA agrees that the delay or anticipated delay is attributable to a *force majeure* event, the time for performance of the obligations under this Settlement Agreement that are affected by the *force majeure* event will be extended by EPA for such time as is necessary to complete those obligations. An extension of the time for performance of the obligations affected by the *force majeure* event shall not, of itself, extend the time for performance of any other obligation. If EPA does not agree that the delay or anticipated delay has been or will be caused by a *force majeure* event, EPA will notify Respondents in writing of its decision. If EPA agrees that the delay is attributable to a *force majeure* event, EPA will notify Respondents in writing of the length of the extension, if any, for performance of the obligations affected by the *force majeure* event.

### **XVIII. STIPULATED PENALTIES**

49. Respondents shall be liable to EPA for stipulated penalties in the amounts set forth in Paragraphs 50 and 51 for failure to comply with the requirements of this Settlement Agreement specified below, unless excused under Section XVII (*Force Majeure*). "Compliance" by Respondents shall include completion of the activities under this Settlement Agreement or any work plan or other plan approved under this Settlement Agreement identified below in accordance with all applicable requirements of law, this Settlement Agreement and any plans or other documents approved by EPA pursuant to this Settlement Agreement and within the specified time schedules established by and approved under this Settlement Agreement.

#### **50. Stipulated Penalty Amounts - Work.**

a. The following stipulated penalties shall accrue per violation per day for any noncompliance identified in Paragraph 47(b):

| <u>Penalty Per Violation Per Day</u> | <u>Period of Noncompliance</u> |
|--------------------------------------|--------------------------------|
| \$500                                | 1st through 14th day           |
| \$1,000                              | 15th through 30th day          |
| \$1,500                              | 31st day and beyond            |

b. Compliance Milestones

- i. Failure to timely submit a draft Work Plan as required by Paragraph 18;
- ii. Failure to timely submit modifications requested by EPA or its representatives to the draft Work Plan;
- iii. Failure to timely submit Plans as required under the Paragraph 14(j).
- iv. Failure to timely submit payment for Past and Future Response Costs required by Paragraphs 39 and 40;
- v. Failure to obtain insurance as required by Paragraph 74; and
- vi. Failure to comply with any schedule in the EPA-approved Work Plan.

51. Stipulated Penalty Amounts - Reports. The following stipulated penalties shall accrue per violation per day for failure to submit timely or adequate reports or other written documents, other than those specifically listed above in Paragraph 50(b), pursuant to Paragraphs 19, 22, 23:

| <u>Penalty Per Violation Per Day</u> | <u>Period of Noncompliance</u> |
|--------------------------------------|--------------------------------|
| \$200                                | 1st through 14th day           |
| \$400                                | 15th through 30th day          |
| \$800                                | 31st day and beyond            |

52. In the event that EPA assumes performance of a portion or all of the Work pursuant to Paragraph 62 of Section XX, Respondents shall be liable for a stipulated penalty in the amount of \$150,000.

53. All penalties shall begin to accrue on the day after the complete performance is due or the day a violation occurs, and shall continue to accrue through the final day of the correction of the noncompliance or completion of the activity. However, stipulated penalties shall not accrue: 1) with respect to a deficient submission under Section VIII (Work to be Performed), during the period, if any, beginning on the 31st day after EPA's receipt of such submission until the date that EPA notifies Respondents of any deficiency; and 2) with respect to a decision by the EPA Management Official at the Superfund Division Director level or higher, under Paragraph 45 of Section XVI (Dispute Resolution), during the period, if any, beginning on the 21st day after the Negotiation Period begins until the date that the EPA management official issues a final decision regarding such dispute. Nothing in this Settlement Agreement shall prevent the simultaneous accrual of separate penalties for separate violations of this Settlement Agreement.

54. Following EPA's determination that Respondents have failed to comply with a requirement of this Settlement Agreement, EPA may give Respondents written notification of the



failure and describe the noncompliance. EPA may send Respondents a written demand for payment of the penalties. However, penalties shall accrue as provided in the preceding Paragraph regardless of whether EPA has notified Respondents of a violation.

55. All penalties accruing under this Section shall be due and payable to EPA within 30 days of Respondents' receipt from EPA of a demand for payment of the penalties, unless Respondents invoke the dispute resolution procedures under Section XVI (Dispute Resolution). All payments to EPA under this Section shall be paid by certified or cashier's check(s) made payable to "EPA Hazardous Substances Superfund," shall be mailed to U.S. Environmental Protection Agency, Fines and Penalties, Cincinnati Finance Center, P.O. Box 979077, St. Louis, MO 63197-9000, shall indicate that the payment is for stipulated penalties, and shall reference the EPA Region and Site/Spill ID Number B4F6, the EPA Docket Number, and the name and address of the party(ies) making payment. Copies of check(s) paid pursuant to this Section, and any accompanying transmittal letter(s), shall be sent to EPA as provided in Paragraph 40.

56. The payment of penalties shall not alter in any way Respondents' obligation to complete performance of the Work required under this Settlement Agreement.

57. Penalties shall continue to accrue during any dispute resolution period, but need not be paid until 15 days after the dispute is resolved by agreement or by receipt of EPA's decision.

58. If Respondents fail to pay stipulated penalties when due, EPA may institute proceedings to collect the penalties, as well as Interest. Respondents shall pay Interest on the unpaid balance, which shall begin to accrue on the date of demand made pursuant to Paragraph 52. Nothing in this Settlement Agreement shall be construed as prohibiting, altering, or in any way limiting the ability of EPA to seek any other remedies or sanctions available by virtue of Respondents' violation of this Settlement Agreement or of the statutes and regulations upon which it is based, including, but not limited to, penalties pursuant to Sections 106(b) and 122(I) of CERCLA, 42 U.S.C. §§ 9606(b) and 9622(I), and punitive damages pursuant to Section 107(c)(3) of CERCLA, 42 U.S.C. § 9607(c)(3). Provided, however, that EPA shall not seek civil penalties pursuant to Section 106(b) or 122(I) of CERCLA or punitive damages pursuant to Section 107(c)(3) of CERCLA for any violation for which a stipulated penalty is provided in this Section, except in the case of a willful violation of this Settlement Agreement or in the event that EPA assumes performance of a portion or all of the Work pursuant to Section XX, Paragraph 62." Notwithstanding any other provision of this Section, EPA may, in its unreviewable discretion, waive any portion of stipulated penalties that have accrued pursuant to this Settlement Agreement.

#### **XIX. COVENANT NOT TO SUE BY EPA**

59. In consideration of the actions that will be performed and the payments that will be made by Respondents under the terms of this Settlement Agreement, and except as otherwise specifically provided in this Settlement Agreement, EPA covenants not to sue or to take administrative action against Respondents pursuant to Sections 106 and 107(a) of CERCLA, 42 U.S.C. §§ 9606 and 9607(a), for the Work, Past Response Costs, and Future Response Costs. This



covenant not to sue shall take effect upon receipt by EPA of the Past Response Costs due under Section XV of this Settlement Agreement and any Interest or Stipulated Penalties due for failure to pay Past Response Costs as required by Sections XV and XVIII of this Settlement Agreement. This covenant not to sue is conditioned upon the complete and satisfactory performance by Respondents of their obligations under this Settlement Agreement, including, but not limited to, payment of Future Response Costs pursuant to Section XV. This covenant not to sue extends only to Respondents and does not extend to any other person.

## **XX. RESERVATIONS OF RIGHTS BY EPA**

60. Except as specifically provided in this Settlement Agreement, nothing in this Settlement Agreement shall limit the power and authority of EPA or the United States to take, direct, or order all actions necessary to protect public health, welfare, or the environment or to prevent, abate, or minimize an actual or threatened release of hazardous substances, pollutants or contaminants, or hazardous or solid waste on, at, or from the Site. Further, nothing in this Settlement Agreement shall prevent EPA from seeking legal or equitable relief to enforce the terms of this Settlement Agreement, from taking other legal or equitable action as it deems appropriate and necessary, or from requiring Respondents in the future to perform additional activities pursuant to CERCLA or any other applicable law.

61. The covenant not to sue set forth in Section XIX above does not pertain to any matters other than those expressly identified therein. EPA reserves, and this Settlement Agreement is without prejudice to, all rights against Respondents with respect to all other matters, including, but not limited to:

- a. claims based on a failure by Respondents to meet a requirement of this Settlement Agreement;
- b. liability for costs not included within the definitions of Past Response Costs or Future Response Costs;
- c. liability for performance of response action other than the Work;
- d. criminal liability;
- e. liability for damages for injury to, destruction of, or loss of natural resources, and for the costs of any natural resource damage assessments;
- f. liability arising from the past, present, or future disposal, release or threat of release of Waste Materials outside of the Site; and
- g. liability for costs incurred or to be incurred by the Agency for Toxic Substances and Disease Registry related to the Site.

62. Work Takeover. In the event EPA determines that Respondents have ceased implementation of any portion of the Work, are seriously or repeatedly deficient or late in their performance of the Work, or are implementing the Work in a manner which may cause an endangerment to human health or the environment, EPA may assume the performance of all or any portion of the Work as EPA determines necessary. Respondents may invoke the procedures set forth in Section XVI (Dispute Resolution) to dispute EPA's determination that takeover of the Work is warranted under this Paragraph. Costs incurred by the United States in performing the Work pursuant to this Paragraph shall be considered Future Response Costs that Respondents shall pay pursuant to Section XV (Payment of Response Costs). Notwithstanding any other provision of this Settlement Agreement, EPA retains all authority and reserves all rights to take any and all response actions authorized by law.

## **XXI. COVENANT NOT TO SUE BY RESPONDENTS**

63. Respondents covenant not to sue and agree not to assert any claims or causes of action against the United States, or its contractors or employees, with respect to the Work, Past Response Costs, Future Response Costs, or this Settlement Agreement, including, but not limited to:

a. any direct or indirect claim for reimbursement from the Hazardous Substance Superfund established by 26 U.S.C. § 9507, based on Sections 106(b)(2), 107, 111, 112, or 113 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9607, 9611, 9612, or 9613, or any other provision of law;

b. any claim arising out of response actions at or in connection with the Site, including any claim under the United States Constitution, the State Constitution, the Tucker Act, 28 U.S.C. § 1491, the Equal Access to Justice Act, 28 U.S.C. § 2412, as amended, or at common law; or

c. any claim against the United States pursuant to Sections 107 and 113 of CERCLA, 42 U.S.C. §§ 9607 and 9613, Section 7002(a) of RCRA, 42 U.S.C. § 6972(a), or State law, relating to the Work, Past Response Costs, or Future Response Costs.

64. Nothing in this Agreement shall be deemed to constitute approval or preauthorization of a claim within the meaning of Section 111 of CERCLA, 42 U.S.C. § 9611, or 40 C.F.R. § 300.700(d).

65. Respondents agree not to assert any claims and to waive all claims or causes of action that they may have for all matters relating to the Site, including for contribution, against any person where the person's liability to Respondents with respect to the Site is based solely on having arranged for disposal or treatment, or for transport for disposal or treatment, of hazardous substances at the Site, or having accepted for transport for disposal or treatment of hazardous substances at the Site, if all or part of the disposal, treatment, or transport occurred before April 1, 2001, and the total amount of material containing hazardous substances contributed by such person to the Site was less than 110 gallons of liquid materials or 200 pounds of solid materials.

66. The waiver in Paragraph 65 shall not apply with respect to any defense, claim, or cause of action that a Respondent may have against any person meeting the above criteria if such person asserts a claim or cause of action relating to the Site against such Respondent. This waiver also shall not apply to any claim or cause of action against any person meeting the above criteria if EPA determines:

a. that such person has failed to comply with any EPA requests for information or administrative subpoenas issued pursuant to Section 104(e) or 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) or 9622(e), or Section 3007 of the Solid Waste Disposal Act (also known as the Resource Conservation and Recovery Act or “RCRA”), 42 U.S.C. § 6972, or has impeded or is impeding, through action or inaction, the performance of a response action or natural resource restoration with respect to the Site, or has been convicted of a criminal violation for the conduct to which this waiver would apply and that conviction has not been vitiated on appeal or otherwise; or

b. that the materials containing hazardous substances contributed to the Site by such person have contributed significantly, or could contribute significantly, either individually or in the aggregate, to the cost of response action or natural resource restoration at the Site.

## **XXII. OTHER CLAIMS**

67. By issuance of this Settlement Agreement, the United States and EPA assume no liability for injuries or damages to persons or property resulting from any acts or omissions of Respondents. The United States or EPA shall not be deemed a party to any contract entered into by Respondents or their directors, officers, employees, agents, successors, representatives, assigns, contractors, or consultants in carrying out actions pursuant to this Settlement Agreement.

68. Except as expressly provided in Section XIX (Covenant Not to Sue by EPA), nothing in this Settlement Agreement constitutes a satisfaction of or release from any claim or cause of action against Respondents or any person not a party to this Settlement Agreement, for any liability such person may have under CERCLA, other statutes, or common law, including but not limited to any claims of the United States for costs, damages and interest under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607.

69. No action or decision by EPA pursuant to this Settlement Agreement shall give rise to any right to judicial review, except as set forth in Section 113(h) of CERCLA, 42 U.S.C. § 9613(h).

## **XXIII. CONTRIBUTION**

70. The Respondents agree that this Settlement Agreement constitutes an administrative settlement for purposes of Sections 113(f)(2) and 122(h)(4) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(h)(4), and that Respondents are entitled, as of the Effective Date, to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(h)(4) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(h)(4), or as may be otherwise provided by law, for “matters addressed” in this Settlement Agreement. The “matters addressed” in this Settlement Agreement

are the Work, Past Response Costs, and Future Response Costs. The Respondents further agree that this Settlement Agreement constitutes an administrative settlement for purposes of Section 113(f)(3)(B) of CERCLA, 42 U.S.C. § 9613(f)(3)(B), pursuant to which Respondents have, as of the Effective Date, resolved their liability to the United States for the Work, Past Response Costs, and Future Response Costs.

a. Each Respondent shall, with respect to any suit or claim brought by it for matters related to this Settlement Agreement, notify EPA in writing no later than 60 days prior to the initiation of such suit or claim. Each Respondent also shall, with respect to any suit or claim brought against it for matters related to this Settlement Agreement, notify EPA in writing within 10 days of service of the complaint or claim upon it. In addition, each Respondent shall notify EPA within 10 days of service or receipt of any Motion for Summary Judgment and within 10 days of receipt of any order from a court setting a case for trial, for matters related to this Settlement Agreement.

b. In any subsequent administrative or judicial proceeding initiated by EPA, or by the United States on behalf of EPA, for injunctive relief, recovery of response costs, or other relief relating to the Site, Respondents shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, *res judicata*, collateral estoppel, issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised in the subsequent proceeding were or should have been brought in the instant case; provided, however, that nothing in this Paragraph affects the enforceability of the covenant by EPA set forth in Section XIX.

c. Effective upon signature of this Settlement Agreement by a Respondent, such Respondent agrees that the time period after the date of its signature shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the United States related to the "matters addressed" as defined in Paragraph 70 and that, in any action brought by the United States related to the "matters addressed," such Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time after its signature of this Settlement Agreement. If EPA gives notice to Respondents that it will not make this Settlement Agreement effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by EPA.

#### **XXIV. INDEMNIFICATION**

71. Respondents shall indemnify, save and hold harmless the United States, its officials, agents, contractors, subcontractors, employees and representatives from any and all claims or causes of action arising from, or on account of, negligent or other wrongful acts or omissions of Respondents, their officers, directors, employees, agents, contractors, or subcontractors, in carrying out actions pursuant to this Settlement Agreement. In addition, Respondents agree to pay the United States all costs incurred by the United States, including but not limited to attorneys fees and other expenses of litigation and settlement, arising from or on account of claims made against the United States based on negligent or other wrongful acts or omissions of Respondents, their officers,



directors, employees, agents, contractors, subcontractors and any persons acting on their behalf or under their control, in carrying out activities pursuant to this Settlement Agreement. The United States shall not be held out as a party to any contract entered into by or on behalf of Respondents in carrying out activities pursuant to this Settlement Agreement. Neither Respondents nor any such contractor shall be considered an agent of the United States.

72. The United States shall give Respondents notice of any claim for which the United States plans to seek indemnification pursuant to this Section and shall consult with Respondents prior to settling such claim.

73. Respondents waive all claims against the United States for damages or reimbursement or for set-off of any payments made or to be made to the United States, arising from or on account of any contract, agreement, or arrangement between any one or more of Respondents and any person for performance of Work on or relating to the Site, including, but not limited to, claims on account of construction delays. In addition, Respondents shall indemnify and hold harmless the United States with respect to any and all claims for damages or reimbursement arising from or on account of any contract, agreement, or arrangement between any one or more of Respondents and any person for performance of Work on or relating to the Site, including, but not limited to, claims on account of construction delays.

## **XXV. INSURANCE**

74. At least seven (7) days prior to commencing any on-Site work under this Settlement Agreement, Respondents shall secure, and shall maintain for the duration of this Settlement Agreement, comprehensive general liability insurance and automobile insurance with limits of one (1) million dollars, combined single limit, naming EPA as an additional insured. Within the same time period, Respondents shall provide EPA with certificates of such insurance and a copy of each insurance policy. Respondents shall submit such certificates and copies of policies each year on the anniversary of the Effective Date. In addition, for the duration of the Settlement Agreement, Respondents shall satisfy, or shall ensure that their contractors or subcontractors satisfy, all applicable laws and regulations regarding the provision of worker's compensation insurance for all persons performing the Work on behalf of Respondents in furtherance of this Settlement Agreement. If Respondents demonstrate by evidence satisfactory to EPA that any contractor or subcontractor maintains insurance equivalent to that described above, or insurance covering some or all of the same risks but in an equal or lesser amount, then Respondents need provide only that portion of the insurance described above which is not maintained by such contractor or subcontractor.

## **XXVI. MODIFICATIONS**

75. The OSC may make modifications to any plan or schedule or Statement of Work in writing or by oral direction. Any oral modification will be memorialized in writing by EPA promptly, but shall have as its effective date the date of the OSC's oral direction. Any other



requirements of this Settlement Agreement may be modified in writing by mutual agreement of the parties.

76. If Respondents seek permission to deviate from any approved work plan or schedule, Respondents' Project Coordinator shall submit a written request to EPA for approval outlining the proposed modification and its basis. Respondents may not proceed with the requested deviation until receiving oral or written approval from the OSC pursuant to Paragraph 75.

77. No informal advice, guidance, suggestion, or comment by the OSC or other EPA representatives regarding reports, plans, specifications, schedules, or any other writing submitted by Respondents shall relieve Respondents of their obligation to obtain any formal approval required by this Settlement Agreement, or to comply with all requirements of this Settlement Agreement, unless it is formally modified.

## **XXVII. ADDITIONAL REMOVAL ACTION**

78. If EPA determines that additional removal actions not included in an approved plan are necessary to protect public health, welfare, or the environment, EPA will notify Respondents of that determination. Unless otherwise stated by EPA, within 30 days of receipt of notice from EPA that additional removal actions are necessary to protect public health, welfare, or the environment, Respondents shall submit for approval by EPA a Work Plan for the additional removal actions. The plan shall conform to the applicable requirements of Section VIII (Work to Be Performed) of this Settlement Agreement. Upon EPA's approval of the plan pursuant to Section VIII, Respondents shall implement the plan for additional removal actions in accordance with the provisions and schedule contained therein. This Section does not alter or diminish the OSC's authority to make oral modifications to any plan or schedule pursuant to Section XXVI (Modifications).

## **XXVIII. NOTICE OF COMPLETION OF WORK**

79. When EPA determines, after EPA's review of the Final Report, that all Work has been fully performed in accordance with this Settlement Agreement, with the exception of any continuing obligations required by this Settlement Agreement, including post-removal site controls, payment of Future Response Costs or record retention, EPA will provide written notice to Respondents. If EPA determines that any such Work has not been completed in accordance with this Settlement Agreement, EPA will notify Respondents, provide a list of the deficiencies, and require that Respondents modify the Work Plan if appropriate in order to correct such deficiencies. Respondents shall implement the modified and approved Work Plan and shall submit a modified Final Report in accordance with the EPA notice. Failure by Respondents to implement the approved modified Work Plan shall be a violation of this Settlement Agreement.

## **XXIX. INTEGRATION/APPENDICES**

80. This Settlement Agreement and its appendices constitute the final, complete and exclusive agreement and understanding among the Parties with respect to the settlement embodied

in this Settlement Agreement. The parties acknowledge that there are no representations, agreements or understandings relating to the settlement other than those expressly contained in this Settlement Agreement. The following appendices are attached to and incorporated into this Settlement Agreement:

Appendix "A": Statement of Work  
Appendix "B": Action Memorandum

### **XXX. EFFECTIVE DATE**

81. This Settlement Agreement shall be effective on the day it is signed by the Regional Administrator or his/her delegate.

The undersigned representatives of Respondents certify that they are fully authorized to enter into the terms and conditions of this Settlement Agreement and to bind the party they represent to this document.

Agreed this day of, 2011.

*April 28<sup>th</sup>, 2011*

IN THE MATTER OF THE WELCH GROUP ENVIRONMENTAL PALMETTO SITE:

For Respondent, Welch Group Environmental, LLC:

By *[Signature]*

Title *President/CEO*

For Respondent, Gary Warehouse Services, LLC:

By \_\_\_\_\_

Title \_\_\_\_\_

in this Settlement Agreement. The parties acknowledge that there are no representations, agreements or understandings relating to the settlement other than those expressly contained in this Settlement Agreement. The following appendices are attached to and incorporated into this Settlement Agreement:

Appendix "A": Statement of Work  
Appendix "B": Action Memorandum

### **XXX. EFFECTIVE DATE**

81. This Settlement Agreement shall be effective on the day it is signed by the Regional Administrator or his/her delegate.

The undersigned representatives of Respondents certify that they are fully authorized to enter into the terms and conditions of this Settlement Agreement and to bind the party they represent to this document.

Agreed this \_\_\_ day of \_\_\_\_\_, 2011.

IN THE MATTER OF THE WELCH GROUP ENVIRONMENTAL PALMETTO SITE:

For Respondent, Welch Group Environmental, LLC:

By \_\_\_\_\_

Title \_\_\_\_\_

For Respondent, Gary Warehouse Services, LLC:

By C. Cummings Gary

Title President

IN THE MATTER OF THE WELCH GROUP ENVIRONMENTAL PALMETTO SITE:

It is so ORDERED and Agreed this 12<sup>th</sup> day of May, 2011.

BY: 

DATE: 05/12/2011

A. Shane Hitchcock, Chief  
Emergency Response and Removal Branch  
Superfund Division  
Region 4  
U.S. Environmental Protection Agency

EFFECTIVE DATE: 05/12/2011

APPENDIX “A”  
STATEMENT OF WORK

Statement of Work

- a. Secure to the section of the warehouse that has high lead concentration dust in order to reduce the direct exposure pathways to nearby human populations and to stop off-site migration of the lead dust;
- b. Remove contaminated dust from the Site accompanied by appropriate monitoring and best management practices to ensure protection of human health and environment;
- c. Implement the following approved plans:
  - i. Health and Safety Plan;
  - ii. Dust Monitoring and Management Plan;
  - iii. Decontamination Plan; and
  - iv. Waste Disposal Plan.



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 05, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 45% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 06, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 55% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 10, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 65% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 10, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 68% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 11, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 75% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 13, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 85% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 16, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 95% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

NOTICE OF POTENTIAL LIABILITY, OFFER TO NEGOTIATE  
FOR REMOVAL ACTION  
URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY  
FEDERAL EXPRESS

Mr. Gene McCall  
McCall Environmental PA  
200 Augusta Arbor Way, Suite B  
Greenville, South Carolina 29605

Re: Welch Group Environmental Palmetto (the Site)  
Belton, Anderson County, South Carolina

Dear Mr. McCall:

This letter is to notify your client, Welch Group Environmental (WGE), of the potential liability, as defined by Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. § 9607(a), as amended (CERCLA), that WGE may have incurred with respect to the above-referenced Site. This letter also notifies WGE of forthcoming removal activities at the Site which WGE is being asked to perform or finance.

The United States Environmental Protection Agency (EPA) has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the Site. EPA has spent, and is considering spending, additional public funds on actions to investigate and control such releases or threatened releases at the Site. Unless EPA reaches an agreement under which a potentially responsible party (PRP) or parties will properly perform or finance such actions, EPA may perform these actions pursuant to Section 104 of CERCLA.

SITE BACKGROUND

The Site is located at 110 Palmetto Parkway, Belton, Anderson County, South Carolina 29627 and is comprised of a one-story, multi-use warehouse building. The Site is owned by GWS and is leased to Welch Group Environmental, LLC (WGE). The South Carolina Department of Health and Environmental Control (SCDHEC) notified EPA of the Site while EPA was conducting Removal Site Evaluations (RSE) at two other facilities where WGE operated in Fair Play and Belton, South Carolina.

WGE used the Site to operate a munitions recovery business. WGE operations generally involve smelting and molding of lead and other metals, such as copper, recovered from both indoor and outdoor shooting ranges across the United States. This Site, specifically, was used to

store recovered lead slugs and shell casings from gun and rifle ranges. On December 2, 2010 SCDHEC ordered WGE to cease operations due to permit violations. WGE ceased operations.

On February 7, 2011, WGE informed EPA that a box of range recovered material had spilled during cleanup and a metal shovel was used to recover the spill material. The metal shovel sparked against residual gun powder on the concrete floor and created a spark. The spark resulted in a fire that partially damaged the building. EPA conducted screening for metal concentrations on the floor and wall areas where most Site operations took place and found that a release of lead exists at high concentrations at or near the surface. These concentrations present an imminent and substantial threat to public health and welfare. Under EPA oversight, on February 10, 2011, WGE and Cummings Gary began securing the Site. The emergency removal action is transitioning into a time-critical removal action, subject to the terms of the Administrative Order on Consent.

#### EXPLANATION OF POTENTIAL LIABILITY

PRPs under CERCLA include current and former owners and operators of the Site, as well as persons who arranged for disposal or treatment of hazardous substances sent to the Site, or persons who accepted hazardous substances for transport to the Site. Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), Section 7003 of the Resource Conservation and Recovery Act, 42 U.S.C. § 6873 (RCRA), and other laws, PRPs may be obligated to implement response actions deemed necessary by EPA to protect health, welfare or the environment. PRPs may also be liable for all costs incurred by the United States Government in responding to any release or threatened release at the Site. Such costs include, but are not limited to, expenditures for investigations, planning, response, oversight, and enforcement activities. In addition, PRPs may be required to pay for damages for injury to natural resources or for their destruction or loss, together with the cost of assessing such damages. Where the Site conditions present an imminent and substantial endangerment to human health, welfare or the environment, EPA may also issue an administrative order pursuant to Section 106(a) of CERCLA to require PRPs to commence cleanup activities. Failure to comply with an administrative order issued under Section 106(a) of CERCLA may result in a fine of up to \$37,500 per day under Section 106(b) of CERCLA, or imposition of treble damages under Section 107(c)(3).

Based on information received during preliminary investigations of the Site, EPA believes that WGE may be a responsible party as an operator of the Site under Section 107(a)(1) of CERCLA, 42 U.S.C. § 9607(a)(1).

Before the United States Government undertakes further response actions, EPA requests that WGE voluntarily perform the planned response actions described below pursuant to an EPA Administrative Settlement Agreement and Order on Consent.

### SITE RESPONSE ACTIVITIES

In addition to the emergency removal activities already undertaken at the Site, the following activities are required to be conducted at the Site:

- a. Secure to the section of the warehouse that has high lead concentration dust in order to reduce the direct exposure pathways to nearby human populations and to stop off-site migration of the lead dust;
- b. Remove contaminated dust from the Site accompanied by appropriate monitoring and best management practices to ensure protection of human health and environment;
- c. Implement the following approved plans:
  - i. Health and Safety Plan;
  - ii. Dust Monitoring and Management Plan;
  - iii. Decontamination Plan; and
  - iv. Waste Disposal Plan.

### STATEMENT OF WORK AND DRAFT ADMINISTRATIVE ORDER

A copy of a draft Administrative Settlement Agreement and Order on Consent (AOC) with a Statement of Work (SOW) is enclosed (Enclosure A). The draft AOC is provided to assist you in negotiations with EPA. Work conducted by PRPs must be conducted according to a signed AOC and an EPA-approved work plan.

### DECISION NOT TO USE SPECIAL NOTICE

Under CERCLA Section 122(e), EPA has the discretionary authority to invoke special notice procedures to formally negotiate the terms of an agreement between EPA and the PRPs to conduct or finance response activities. Use of these special notice procedures triggers a moratorium on certain EPA activities at the Site while formal negotiations between EPA and the PRP or PRPs are conducted. In this case, EPA has decided not to invoke the Section 122(e) special notice procedures. EPA's rationale for not invoking Section 122(e) special notice procedures is based on the Agency's removal policy regarding time-critical removals. Nonetheless, EPA is willing to discuss settlement opportunities without invoking a moratorium, but will issue an order or initiate the response action as planned if such discussions do not lead to settlement expeditiously.

### ADMINISTRATIVE RECORD

Pursuant to CERCLA Section 113(k), EPA will establish the administrative record that will contain documents that will form the basis of EPA's decision on the selection of a response action for the Site. This administrative record will be open to the public for inspection and comment.



## RESOURCES AND INFORMATION FOR SMALL BUSINESSES

As you may be aware, the Superfund Small Business Liability Relief and Brownfields Revitalization Act was signed into law on January 11, 2002. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at <http://www.epa.gov/brownfields/laws/sblrbra.htm> and review guidance regarding these exemptions at <http://www.epa.gov/brownfields/laws/index.htm>.

EPA has created a number of helpful resources for small businesses. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at [www.epa.gov](http://www.epa.gov). In addition, the EPA Small Business Ombudsman may be contacted at [www.epa.gov/sbo](http://www.epa.gov/sbo).

## PRP RESPONSE AND CONTACT

WGE is encouraged to contact EPA in writing within twenty-four (24) hours of its receipt of this letter to indicate a willingness to participate in future negotiations at this Site. If EPA does not receive a timely response, EPA will assume that WGE does not wish to negotiate a resolution of its liabilities in connection with the response action, and that WGE has declined any involvement in performing the response activities. Moreover, if WGE does not contact EPA to indicate its willingness to participate in the response actions at the Site and/or does not participate in the negotiations, WGE may be issued an administrative order under Section 106(a) of CERCLA, or be held liable under Section 107 of CERCLA, for the cost of the response activities EPA performs at the Site and for any damages to natural resources.

If WGE is interested in participating in future negotiations at the Site, such negotiations must be concluded by Friday, April 15, 2011.

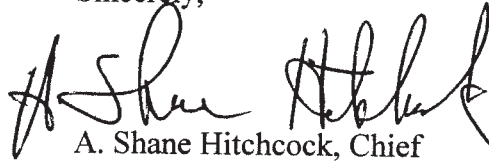
Response to this notice letter may be sent by email and should be sent to:

Bianca N. Jaikaran  
Assistant Regional Counsel  
U.S. Environmental Protection Agency  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
[jaikaran.bianca@epa.gov](mailto:jaikaran.bianca@epa.gov)

If you have any technical questions relating to this matter, please direct them to Leo Francendese, On-Scene Coordinator, at (404) 606-2223. All legal questions should be directed to Bianca N. Jaikaran, Assistant Regional Counsel, at (404) 562-9680.

The factual and legal discussions contained in this letter are intended solely for notification and information purposes. They are not intended to be and cannot be relied upon as final EPA positions on any matter set forth herein.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Shane Hitchcock". The signature is fluid and cursive, with the first name "A. Shane" and the last name "Hitchcock" clearly distinguishable.

A. Shane Hitchcock, Chief  
Emergency Response & Removal Branch  
Superfund Division  
Region 4  
U.S. Environmental Protection Agency

Enclosure A: Administrative Settlement Agreement and Order on Consent

cc: Daphne Neil, SC DHEC

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 17, 2011

1. Continued XRF analyzing floor in area b with one reading taken in each 2' x 2' square. All squares that are above 400 ppm re-cleaned and verified as we progress.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 100% of XRF verification. All Squares verified to this point below 400 ppm reading, will continue with readings and re-cleaning of failed squares.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 18, 2011

1. Began gridding out walls in area b, gridded out 9 squares on each section of wall based on each sections measurement. Completed grid and began xrf reading on wall sections in area b.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 100% of gridding of walls and 50% of xrf verification on walls.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 19, 2011

1. Completed XRF verification with swipe test method of wall sections in area b. Started gridding red steel in area b, and started xrf verification of red steel.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 100% of XRF verification of walls and 100% of gridding out red steel in area b, and started reading of red steel, completed approximately 75% of xrf verification of red steel in area b.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 20, 2011

1. Continued with XRF verification of red steel in area b.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 100% of XRF on red steel in area b.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 23, 2011

1. Started decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 5% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 24, 2011

1. Started decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 10% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 25, 2011

1. Started decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 15% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 26, 2011

1. Started decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 25% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 27, 2011

1. Started decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 45% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: May 30, 2011

1. Started decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 60% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- Fairplay Site

Progress Notes

Date: June 1, 2011

1. Resumed decontamination of track hoe, and bobcat at Fairplay site. Concentrated on the tracks of the track hoe, and wheels of the bobcat.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 50% of cleaning tracks on track hoe.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- Fairplay Site

Progress Notes

Date: June 2, 2011

1. Resumed decontamination of track hoe, and bobcat at Fairplay site. Concentrated on the tracks of the track hoe, and wheels of the bobcat.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 100% of cleaning tracks on track hoe.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- Fairplay Site

Progress Notes

Date: June 3, 2011

1. Decontamination complete on track hoe and bobcat, verification in progress. Waiting on OTIE representative to verify with XRF analysis. After analysis determined it needs to be recleaned.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed verification, but have to re-clean due to high xrf readings.
5. Crew size was one supervisor and one worker.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 13, 2011

1. Continued with decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 90% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 14, 2011

1. Continued with decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 95% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 15, 2011

1. Continued with decontamination of tables, desks, and random objects stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 100% of verification and removal of objects from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 16, 2011

1. Started decontamination of stacks of wood stored in area c. As objects are verified they will be moved into area b, which has been cleaned and verified.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 100% of verification and removal of stacks of wood from area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 20 2011

1. Started decontamination of floor in area c.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 25% of floor decontamination in area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

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# Lead Dust Confirmation Sampling Strategy

## Purpose

This document describes general and specific procedures, methods and considerations to be used and observed when collecting wipe samples of contaminated surfaces for field screening or laboratory analysis.

## Scope

The procedures contained in this document are to be used by field personnel when collecting and handling wipe samples in the field. These procedures are normally used to sample various surfaces, such as documents, building materials (walls, doors, floors, etc.) and equipment. To determine the relative degree to which these surface are contaminated. These procedures are also used to evaluate the effectiveness of decontamination procedures.

## Safety

Proper safety precautions must be observed when collecting wipe samples. Refer to the field specific Health and Safety Plan. Address chemicals that pose specific toxicity or safety concerns and follow any relevant requirements, as appropriate, such as ensuring that any personal protective equipment (PPE) is compatible with the solvents used for wipe sampling.

## Procedural Precautions

The following precautions should be considered when collecting wipe samples.

- Special care must be taken not to contaminate samples. This includes storing samples in a secure location to preclude conditions which could alter the properties of the sample. Samples shall be custody sealed during long-term storage or shipment.
- Collected samples are in the custody of the sampler or sample custodian until the samples are relinquished to another party
- If samples are transported by the sampler, they will remain under his/her custody or be secured until they are relinquished.
- Shipped samples shall conform to all U.S. Department of Transportation (DOT) rules of shipment found in Title 49 of the Code of Federal Regulations (49 CFR Parts 171 to 1179), and/or International Air Transportation Associates (IATA) hazardous materials shipping requirements found in the current edition of IATA's Dangerous Goods Regulations.
- Documentation of field sampling is done in a bound logbook.
- Chain-of-custody documents shall be filled out and remain with the samples until custody is relinquished.
- All shipping documents, such as bills of lading, etc., shall be retained by the project leader and stored in a secure place.

## **Special Precautions for Trace Contaminant Wipe Sampling**

- Wipe samples are normally taken from non-absorbent, smooth surfaces, such as metal, glass, plastic, finished concrete, etc. Rough surfaces may be sorbent or may cause the material used for wiping to tear apart.
- A clean pair of new, non-powdered, disposable gloves will be worn each time a different surface is sampled and the gloves should be donned immediately prior to sampling. The gloves should not come in contact with the media being sampled and should be changed any time during sample collection when their cleanliness is comprised.
- If possible, one member of the field sampling team should take all the notes and photographs and provide other sampling support activities, while the other member(s) collect the samples.
- Samplers must use new, verified certified-clean disposable or non-disposable equipment properly cleaned and decontaminated.

## **Wipe (Contaminated Surface) Sampling Methods**

### **Wipe material**

Wipes may be prepared using absorbent materials, including sterile gauze pads, new cotton material, moist towlettes. Wipes should be prepared so that each pad is no more than several inches on a side and is composed of several layers of material, i.e., a four-inch square of single layer material that is folded in half, then folded in half again.

### **Wipe Solvent**

Wipes are saturated with a solvent that is appropriate for the objectives of the study. Typical solvents used for wiping include analyte-free water (distilled water), isopropanol, hexane, or other solvent. If metals, (such as lead) or other inorganic analytes are the sole contaminant of concern, analyte-free water is acceptable.

### **Containerization**

After the wipe pads have been prepared and wetted with the appropriate solvent or analyte-free water, they are placed in an 8-ounce or similar size glass sample container.

## **Sample Collection Procedures**

The following procedures should be followed when collecting wipe (contaminated surface) samples:

### **Step 1)**

- Put on disposable shoe covers and layout the sampling area
- Use a durable, re-usable 12 inch by 12 inch (12" x 12") sampling template, a disposable template, or use tape to lay out the sampling area.

- Clean the template with an new wipe
- Tape template to surface
- If no template, outline the sample area with tape
- DO NOT touch the area inside the template

Step 2)

- Prepare the sample containers
- Use a clean sample container
- Label the container with ID number
- Record the ID number on the sample collection form and chain of custody form
- Partially unscrew the cap on the container
- Place the container near the sample area.

Step 3)

- Put on clean gloves
- Use disposable gloves
- Use new gloves for each sample
- DO NOT touch anything except the wipe after putting on the gloves

Step 4)

- Wipe the Sample area and place the wipe sample in the sample container
- Do not touch other objects
- Press the wipe sample down firmly at an upper corner of the sample area.
- Make as many “S”-like motions to wipe the entire area, moving from side to side. Do not cross the outer border of the tape or template.
- Fold the wipe in half, keeping the dirty side in, and repeat the wiping procedure moving up and down (opposite to side to side).
- Fold the wipe again and repeat the wiping procedure, concentrating on collecting dust from the edges and corners of the sample area.
- Fold the wipe again with the sample side folded in, and place the folded wipe into the sample container.
- Cap the container. Discard the gloves into a trash bag.
- Label the container and record the sampling area.
- Repeat Steps 1 thru 4 for each sample collected

Step 5)

- Clean up
- Clean template with a clean wipe; place in a plastic bag for storage.
- Remove the materials from the site: gloves, tape, and shoe covers and place in a trash bag.
- Clean face and hands with warm soapy water
- Send the samples to a laboratory recognized by the National Lead Laboratory Accreditation Program (NLLAP) as being proficient in lead in dust analysis.

### Clearance standards:

Floors: 40 micrograms per square foot ( $\mu\text{g}/\text{ft}^2$ )

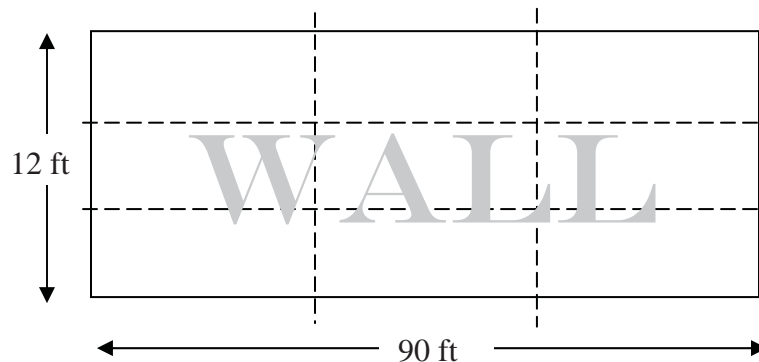
Window troughs:  $400 \mu\text{g}/\text{ft}^2$

### Sampling Strategy

All surfaces and areas selected for sampling should be based on the study's objectives. Typically, when interiors of building or other structures are sampled, wipes from horizontal surfaces, where greater amounts of dust collect, will have higher reporting values than vertical surfaces, such as walls, in the same area.

#### Walls

- Wall surface material and ancillary items attached to the wall (i.e., support beams: wood, steel, utility pipes, and door frames) will be treated as separate objects and sampled separately
- Separate the wall into nine equal sampling zones (example below)



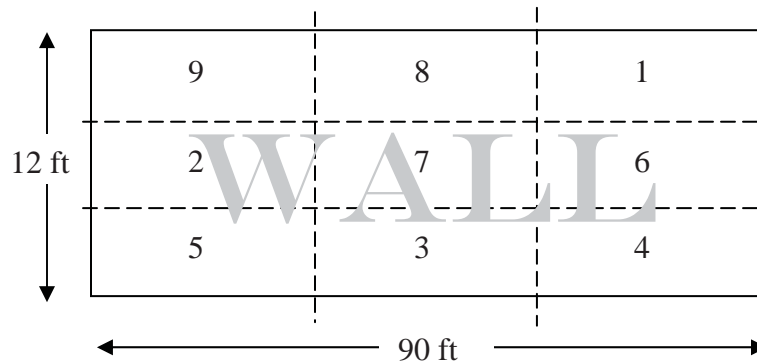
- If the surface area is...
  - $\leq 1000$  square feet (sq ft.) take a minimum of three samples (only one sample per grid)
  - 1000-5000 sq ft. take a minimum of 5 samples (only one sample per grid)
  - $> 5000$  sq ft. take a minimum of 7 samples (only one sample per grid)
- It is recommended to take nine (9) samples, regardless the square footage.

## Sampling locations

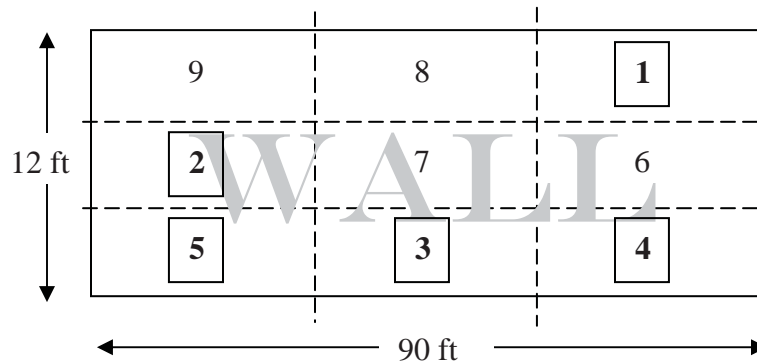
- If less than 9 samples are collected a randomization chart shall be used to determine the sampling locations
- The following are four random number diagrams

| Sampling Area 1 | Sampling Area 2 | Sampling Area 3 | Sampling Area 4 |
|-----------------|-----------------|-----------------|-----------------|
| 9               | 8               | 4               | 6               |
| 8               | 7               | 1               | 1               |
| 1               | 1               | 7               | 8               |
| 2               | 3               | 2               | 5               |
| 7               | 9               | 9               | 9               |
| 6               | 5               | 6               | 3               |
| 5               | 4               | 8               | 2               |
| 3               | 2               | 5               | 7               |
| 4               | 6               | 3               | 4               |

- Example: Sampling Area 1 random number diagram is applied to the previous diagram...



- The total wall square footage is 1080 square feet, thus a minimum of 5 samples need to be collected. (again, 9 is recommended)
- Sample locations are with grid locations 1 thru 5 will be collected.





## Utilities and Supporting structures

- If an exposed utility line (such as a water pipe) or an exposed supporting structure (such as a steel beam) lies in a grid it will be sampled separate from the wall samples.
- If the utility line or support structure runs vertically from floor to ceiling, collect one wipe sample for each separate vertical run.
- If the utility line or support structure runs horizontally collect two wipe samples per line on the top side of the sampling surface.
- It may not be possible to place a 12 x 12 inch template on utility pipe or support structure. In this case you may change your sampling grid so that it still covers 144 square inches. For example a sampling grid of 3 inches by 48 inches equals 144 square inches.
- If the sample grid changes note it in the log book
- If the 144 square inches can not be obtained note that in the log book.

# Material Safety Data Sheet

Page 1 of 3

Issue Date: October 6, 1997 Revisions: Rev 1: 01/28/98; Rev 2: 03/25/01; Rev 3: 01/30/03  
Rev 4: 05/31/04; Rev 5: 04/06/05; Rev 6: 04/11/06; Rev 7: 5/13/08

WT- D-Wipe® Towels

## Section 1: Chemical Product and Company Identification

**Product Name:** D-Wipe® Towels

**Manufacturer:** ESCA Tech, Inc.  
3747 North Booth Street  
Milwaukee, WI 53212  
Phone: (414) 962-5323  
Fax: (414) 962-7003  
email: [cservice@esca-tech.com](mailto:cservice@esca-tech.com)

**Transportation Emergency Phone:**  
1-800-535-5053  
InfoTrac  
(24 hours, during transportation only)



**Product Code #:** WT -040; WT-150; WT-070; WT-001

**CAS No.:** Not applicable – product is a mixture

**Generic Description:** Pre-moistened Cleaning Towels

## Section 2: Composition/Information on Ingredients

| Hazardous Ingredient<br>CAS Number       | Max %<br>w/ w | TWA (ACGIH)<br>(ppm) | TLV (OSHA)<br>(ppm) |
|--|---------------|----------------------|---------------------|
| Ethanol (CAS#: 64-17-5)                  | 20            | 1,000                | 1,000               |
| Benzalkonium Chloride (CAS#: 68391-01-5) | 0.5           | 25                   | 25                  |

## Section 3: Hazards Identification

### Potential Health Effect

EYE CONTACT: Possible. May cause stinging or eye irritation upon contact.  
SKIN CONTACT: If skin rash or irritation occurs discontinue use, apply skin lotion.  
INGESTION: Not normal route of entry.  
INHALATION: None known. Does not generate vapors at normal temperatures of use.

## Section 4: First Aid Measures

EYE CONTACT: Remove contact lenses. Flush with water for 15 minutes and get immediate medical attention.  
SKIN CONTACT: If irritation persists, get medical attention.  
INGESTION: Do not induce vomiting. If ingested, get immediate medical attention.  
INHALATION: Remove victim to fresh air.

## Section 5: Fire Fighting Measures

Flash Point: NA  
LEL: NA  
UEL: NA  
Extinguishing Media: Carbon Dioxide or Alcohol type foam.  
Unusual Fire and Explosion Hazards: Product contains ethyl alcohol.  
Special Fire Fighting Procedure: NA

**ESCA Tech, Inc.** 3747 N. Booth Street  
Phone (414) 962-5323

**Milwaukee, WI 53212 U.S.A.**  
Fax (414) 962-7003

# Material Safety Data Sheet

Page 2 of 3

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Rev 4: 05/31/04; Rev 5: 04/06/05; Rev 6: 04/11/06; Rev 7: 5/13/08

WT- D-Wipe® Towels

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## Section 6: Accidental Release Measures

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NA.

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## Section 7: Handling and Storage

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**Handling:** Keep out of reach of children, except under adult supervision. Avoid eye contact. Avoid tasting or ingesting this product.

**Storage:** Store at temperatures between 40 °F and 90 °F (4 °C – 32 °C), out of direct sunlight. Store away from heat and ignition sources. Keep canister tightly closed when not in use. After use may contain heavy metals. Dispose in accordance with all applicable local, state and federal waste regulations.

---

## Section 8: Exposure Controls/Personal Protection

---

|   |                                     |
|---|-------------------------------------|
| General Controls                        | Avoid eye contact.                  |
| Respiratory Protection:                 | Not required.                       |
| Ventilation:                            | Normal                              |
| Protective Clothing:                    | Not required.                       |
| Protective Gloves:                      | Not required.                       |
| Eye Protection:                         | Avoid eye contact.                  |
| Other Protective Clothing or Equipment: | Not needed.                         |
| Work/Hygienic Practices:                | Follow good housekeeping practices. |

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## Section 9: Physical and Chemical Properties

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|                                       |   |
|---------------------------------------|---|
| Boiling Point:                        | NA  |
| Vapor Pressure:                       | NA  |
| Vapor Density (Air = 1):              | NA  |
| Specific Gravity (H2O = 1):           | NA  |
| Evaporation Rate (Butyl Acetate = 1): | NA  |
| Solubility in Water:                  | NA  |
| Appearance and Odor:                  | White applicator towel saturated with clear liquid with citrus odor |
| PH:                                   | 4.5 - 5.5   |

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## Section 10: Stability and Reactivity

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|                                       |  |
|---------------------------------------|--|
| Stability:                            | Stable.                                |
| Conditions to Avoid:                  | High temperatures.                     |
| Incompatibility (materials to avoid): | Strong oxidizers.                      |
| Hazardous Polymerization              | Will not occur.                        |
| Hazardous Decomposition               | Carbon dioxide and/or carbon monoxide. |

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## Section 11: Toxicological Information

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This product has not been tested as a whole.

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## Section 12: Ecological Information

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This product has not been tested as a whole.

---

## Section 13: Disposal Consideration

---

Waste disposal method: According to all local, state and federal regulations.

---

**ESCA Tech, Inc.**      **3747 N. Booth Street**  
**Phone (414) 962-5323**

**Milwaukee, WI 53212 U.S.A.**  
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# Material Safety Data Sheet

Page 3 of 3

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WT- D-Wipe® Towels

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## Section 14: Transport Information

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This product is not regulated as a DOT hazardous material.

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## Section 15: Regulatory Information

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|   |   |
|---|---|
| RCRA (Lists of Hazardous Wastes, 40 CFR 261 Subpart D):   | NA  |
| CLEAN AIR ACT (SEC. 112. Hazardous Air Pollutants):       | NA  |
| CLEAN WATER ACT (RQ, 40 CFR):                             | NA  |
| CERCLA: Section 102 (RQ, 40 CFR):                         | NA  |
| SARA Title III:   | Components present in this product at a level which could require reporting are: none.                          |
| Section 302 - 304, 40 CFR 355                             |   |
| Section 311 - 312:  | Components present in this product at a level which could require reporting are: none.                          |
| Section 313:  | NA  |
| TSCA Section 8(b) Inventory Status:                       | All ingredients are listed on TSCA Inventory of Chemical Substances or exempt from TSCA Inventory requirements. |
| Workplace Hazardous Materials Information System (WHMIS): | Components present in this product at a level which could require reporting are: none.                          |

### State Lists

Ethanol - FL, MA, NJ, PA

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## Section 16: Other Information

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NA – Not Applicable

ESCA Tech, Inc Disclaimer "The information and recommendations presented herein are based on sources believed to be reliable as of the date hereof . ESCA Tech makes no representation as to the completeness or accuracy thereof. It is the user's responsibility to determine the product's suitability for its intended use, the product's safe use, and the product's proper disposal. No representations or warranties not expressly set forth herein are made hereunder, whether express or implied by operation of law or otherwise, including, but not limited to any implied warranties of MERCHANTABILITY OR FITNESS. ESCA Tech neither assumes nor authorizes any other person to assume for it, any other or ADDITIONAL LIABILITY OR RESPONSIBILITY resulting from the use of, or reliance upon. this information."

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**Phone (414) 962-5323**

**Milwaukee, WI 53212 U.S.A.**  
**Fax (414) 962-7003**

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PO Box 32 ▾ 105 Liberty Street ▾ Winona, MN 55987 ▾ Phone: 800-533-0027 or 507-454-5640 ▾ Fax: 507-454-5641

**FOR CHEMICAL EMERGENCY**

Involving Shipping and Handling Spills, Leak, Fire, Exposure or Accident

Call CHEMTREC 1-800-424-9300

Complies with OSHA's Hazard Communication Standard 29 CFR 1910.1200

**Section 1 - Product Identification**

Product Name: Trisodium Phosphate, all sizes

Product ID: 0200X

**Section 2 - Composition/Information on Ingredients**

| CHEMICAL NAME (COMMON NAME)   | WT % | CAS NO.   | EINECS NO. | RISK PHRASE |
|-------------------------------|------|-----------|------------|-------------|
| Trisodium Phosphate Anhydrous | 100  | 7601-54-9 | 231-509-8  | R34R37/38   |

**Section 3 - Hazards Identification**

EC CLASSIFICATION XI: Irritant

SAFETY PHRASE: S26 S36/37/39

HUMAN HEALTH EFFECTS: This product causes eye burns and may cause skin irritation. Inhalation of dust may cause coughing and sneezing. Inhalation may cause respiratory irritation. Ingestion may cause severe nausea, vomiting, abdominal discomfort and burning sensation.

ENVIRONMENTAL EFFECTS: This material is not expected to produce any significant adverse environmental effects when recommended use instructions are followed.

**Section 4 - First Aid Measures**

WARNING STATEMENTS: DANGER! CAUSES EYE IRRITATION. MAY CAUSE RESPIRATORY TRACT IRRITATION.

GENERAL: Treatment is symptomatic and supportive. The product causes eye and skin irritation. May be harmful if swallowed. This product is destructive to mucus membranes.

EYES: In case of contact with eyes, immediately flush with plenty of water for at least 15 minutes. Seek medical attention if irritation, pain, swelling, lacrimation, or photophobia persists.

SKIN: Immediately remove this from skin and wash with plenty of water. Remove contaminated clothing. Wash clothing and thoroughly clean shoes before reuse.

INHALATION: Inhalation of the dust may cause coughing and sneezing. Remove to fresh air immediately. If not breathing, give artificial respiration. If breathing is difficult, give oxygen.

INGESTION: Give 2-4 cupfuls of milk or water. Never give anything by mouth to an unconscious person. DO NOT induce vomiting. Get medical attention immediately. Contact a Poison Control Center. May cause severe nausea, vomiting, abdominal discomfort, and burning sensation.

**Section 5 - Fire Fighting Measures**

EXTINGUISHING MEDIA: water spray, dry chemical, carbon dioxide, or appropriate foam.

UNSUITABLE EXTINGUISHABLE MEDIA: Non-combustible. No Special requirement.

**Section 6 - Accidental Release Measures**

PERSONAL PRECAUTIONS: Avoid unnecessary exposure and remove all material from eyes, skin and clothing.

ENVIRONMENTAL PRECAUTIONS: Avoid discharge into the environment.

METHOD FOR CLEANING UP: Sweep, scoop or vacuum spill material, contaminated soil and other contaminated material and place in clean, dry containers for removal. If possible, complete cleanup on a dry basis.

**Section 7 - Handling and Storage**

HANDLING: Do not get in eye, on skin, or on clothing. Avoid breathing dust. Do not taste or swallow. Use only in adequate ventilation. Wash thoroughly after handling. Remove material from clothing.

ENGINEERING MEASURES: Ensure adequate ventilation. The use of local mechanical exhaust ventilation is preferred at sources of air contamination such as open process equipment.

STORAGE: Store in cool, dry place to maintain product performance. Product should be stored in sealed containers and be kept free of water due to product corrosively.

**Section 8 - Exposure Controls and Personal Protection**

OCCUPATIONAL EXPOSURE LIMIT: OSHA and ACGIH have not established specific exposure limits for this material. However, OSHA and ACGIH have established limits for particulates not otherwise regulated (PNOR) and particulates not otherwise classified (PNOC) which are the least stringent exposure limits applicable to dusts.

ACGIH TLV 10 mg/m<sup>3</sup> (inhalable) 8-hr TWA 3 mg/m<sup>3</sup> (respirable) 6-hr TWA

OSHA PEL 15 mg/m<sup>3</sup> (total dust) 8-hr TWA 5 mg/m<sup>3</sup> (respirable) 8-hr TWA

RESPIRATORY PROTECTION: Avoid breathing dust. In case of insufficient ventilation, use approved respiratory protective equipment.

HAND/SKIN PROTECTION: Wear protective gloves is recommended; wash hands and contaminated skin thoroughly after handling.



EYE PROTECTION: Wear appropriate protective eyeglasses or chemical safety goggles.

## Section 9 - Physical and Chemical Properties

CHEMICAL FORMULA: Na<sub>3</sub>PO<sub>4</sub>

ODOR: Odorless

COLOR: White

FORM: Free-flowing granular product

pH: 11.5

MELTING POINT: 1340° F

## Section 10 - Stability and Reactivity

Product is stable under normal conditions of storage and handling.

CONDITIONS TO AVOID: Store product in dry areas away from moisture. This product could be corrosive to aluminum surfaces due to high pH. When wet, mild steel and brass may be corroded.

MATERIALS TO AVOID: Incompatible with strong mineral acids, aluminum and moisture.

HAZARDOUS DECOMPOSITION: Oxides of sodium and phosphorus may form when heated decomposition.

## Section 11 - Toxicological Information

LABORATORY DATA: Data From ICL Performance Products LP Single-dose (acute) animal studies with this material are given below:

ORAL – RAT LD50: 4,150 MG/KG; Slightly Toxic

DERMAL – RABBIT LD: >7,940 MG/KG; Practically Nontoxic

EYE IRRITATION – RABBIT: Corrosive

SKIN IRRITATION – RABBIT: 2.2/8.0 (24-hr. exp.); Slightly

Irritating

This product produced no mutagenic effects in standard assays using fruit flies.

This material has been defined as a hazardous chemical under the criteria of the OSHA Hazard Communication standard (29 CFR 1910.1200).

## Section 12 - Ecological Information

ENVIRONMENTAL TOXICITY: INVERTEBRATE: 50-hr EC50 Daphnia Magna: 177 mg/L; Practically Nontoxic

WARMWATER FISH: 96-hr LC50 Bluegill Sunfish: 220 mg/L; Practically Nontoxic

COLDWATER FISH: 96-hr LC50 Rainbow Trout: 120 mg/L; Practically Nontoxic

ENVIRONMENTAL FATE: Inorganic compounds in contact with the soil, sub-surface or surface waters may be taken up by plants and utilized as essential nutrients. Phosphates may also form precipitates, usually with calcium or magnesium. The resultant compounds are insoluble in water and become a part of the soil or sediment. The term biodegradability, as such, is not applicable to inorganic compounds.

## Section 13 - Disposal Considerations

EUROPEAN WASTE CATALOG NUMBER: Unknown

DISPOSAL CONSIDERATIONS: This material when discovered is not a hazardous waste as that term is defined by the Resource, Conservation and Recovery Act (RCRA), 40 CFR 261. Dry material may be land-filled or recycled in accordance with local, state and federal regulations. Consult your attorney or appropriate regulatory officials for information on such disposal.

## Section 14 - Transport Information

The data provided in this section is for information only. Please apply the appropriate regulations to properly classify your shipment for transportation.

ROAD/RAIL, SEA AND AIR

IMDG/UN Environmentally Hazardous Substance, solid, n.o.s., UN 3077, Class 9, PG III

ICAO/IATA PASSENGER AIRCRAFT. Environmentally Hazardous Substance, solid, n.o.s. UN 3077, Class 9, PG III

RID/ADR Unknown

CANADIAN TDG Sodium Phosphate Tribasic, NA9148, Class 9.2, PG III+

US DOT Environmentally Hazardous Substance, solid, n.o.s. (contains Sodium Phosphate Tribasic), UN 3077, 9, PG III\*

+ Applies only to packages containing a Reportable Limit of 230 kg or more.

\* Applies only to packages containing a Reportable Quantity (RQ) of 5000 lb. or more.

## Section 15 - Regulations

CHEMICAL INVENTORY

USA TSCA: Listed

CANADA DSL: Listed

EC: Listed

WHMIS CLASSIFICATION: D2(B) Materials Causing Other Toxic Effects

SARA HAZARD NOTIFICATION

HAZARD CATEGORIES UNDER TITLE III RULES (40 CFR 370): Immediate

SECTION 302 EXTREMELY HAZARDOUS SUBSTANCES: Not Applicable

SECTION 313 TOXIC CHEMICAL(S): Not Applicable

CERCLA REPORTABLE QUANTITY: 5,000 lb. of sodium phosphate, tribasic

## Section 16 - Other Information

NFPA RATING Health 3 Fire 0 Reactivity 0

HMIS RATING Health 3 Fire 0 Reactivity 0

*The information and recommendations in this Material Safety Data Sheet are based upon data believed to be correct and does not relate to its use in combination with any other material or process. Since use conditions vary, we assume no liability for failure to follow product use direction and safety precautions. As data, standards and regulations change; NO WARRANTY, EXPRESS OR IMPLIED, IS MADE AS TO THE COMPLETENESS OR CONTINUING ACCURACY OF THIS INFORMATION.*

## MEMORANDUM

DATE: June 27, 2011

SUBJECT: Schedule Milestones for the Time Critical Removal Action at the Welch Group Environmental (WGE) **Belton Site**, Anderson County, South Carolina

FROM: Leo Francendese, On-Scene Coordinator, Emergency Response and Removal Branch

TO: Glenn Welch, Welch Group Environmental

The purpose of this memorandum is to document the schedule milestones that were agreed to with WGE at a meeting in Atlanta between the EPA OSC and WGE on June 24<sup>th</sup>, 2011. The meeting was held to establish timelines and deliverables for the time critical removal action at the WGE sites.

The **Palmetto site** is approximately 75% complete and is scheduled for completion by **August 14<sup>th</sup>, 2011**. This memo documents discussions concerning the Belton site. WGE and the EPA OSC agreed that the site has been divided into four operational sections. The operational sections of the site were divided into Drums, Structures, Miscellaneous Debris and Soil. It was agreed that the above order of the operational sections represented the priority of work to be performed. The following is a documentation of deliverables and expected timelines.

### Drums

In order to address the drums WGE will need to provide:

- 1) Waste Management Plan (WMP) which includes:
  - a) Waste Profile
  - b) Waste Disposal Option Analysis

The **WMP** is due to the EPA for review on **August 1, 2011**.

### Structures

In order to address the building, WGE will need to develop a Structures Remediation Option Analysis Plan (SROAP). The results of the options analysis should conclude in a chosen course of action such as decontamination and/or demolition and disposal.

The **SROAP** is due to the EPA for review on **September 5, 2011**.

## **Miscellaneous Debris**

WGE has been tasked with preparing a Debris Management Plan for other site debris that may require decontamination and/or disposal (DMP).

The **DMP** is due to the EPA for review on **October 1, 2011**.

## **Soil**

Soil removal activities will be discussed with the EPA at a future date.

In addition to the above operational schedule milestones, the EPA OSC requested that WGE enlist the services of a certified industrial hygienist (CIH) to review their sitewide Health and Safety plan.

All milestones and recommendations were agreed to by WGE.

cc:

Chris McCluskey, SCDHEC

Paul Wilkie, SCDHEC

James Webster, USEPA ERRB Section Chief

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 21 2011

1. continued decontamination of floor in area c.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 50% of floor decontamination in area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 22 2011

1. Started boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 5% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

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864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 23 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 10% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and four workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: June 24 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 15% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and two workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 05 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 20% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 05 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 20% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

118 White Oak Road

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 06 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 25% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

[welchgroupsafety@gmail.com](mailto:welchgroupsafety@gmail.com)

Welch Group Environmental

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864-462-0405



WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 06 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 25% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 07 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 30% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 08 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 35% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 11 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 40% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 12 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 45% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and three workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 13 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 50% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and two workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

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Progress Notes

Date: July 15 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 70% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and one workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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Welch Group Environmental

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WGE Belton, SC- PALMETTO Site

Progress Notes

Date: July 14 2011

1. Continued boxing up and shrink wrapping miscellaneous debris in area c for disposal that could not be decontaminated.
2. All solid waste, PPE (suits, gloves, and rags) disposed of in a contractor trash bag sealed with tape and lead hazard sticker placed on bag.
3. Waste generated was Tyvek suites, gloves, and rags.
4. Completed approximately 65% of prepping miscellaneous debris for disposal in area c.
5. Crew size was one supervisor and two workers.

Report Submitted By: Scott Shaw (Safety Coordinator)

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