



June 29, 2012

Mr. Leo Francendese
On-Scene Coordinator
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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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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[®] tubing to Gillian Low-Flow Sampler[®] 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 (ug/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.

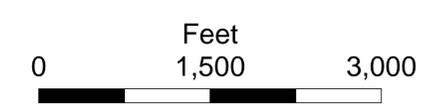
All EPA site related documents and Pollution Situation Reports are presented in Appendix F.

APPENDIX A
FIGURES



Legend

 Site Location

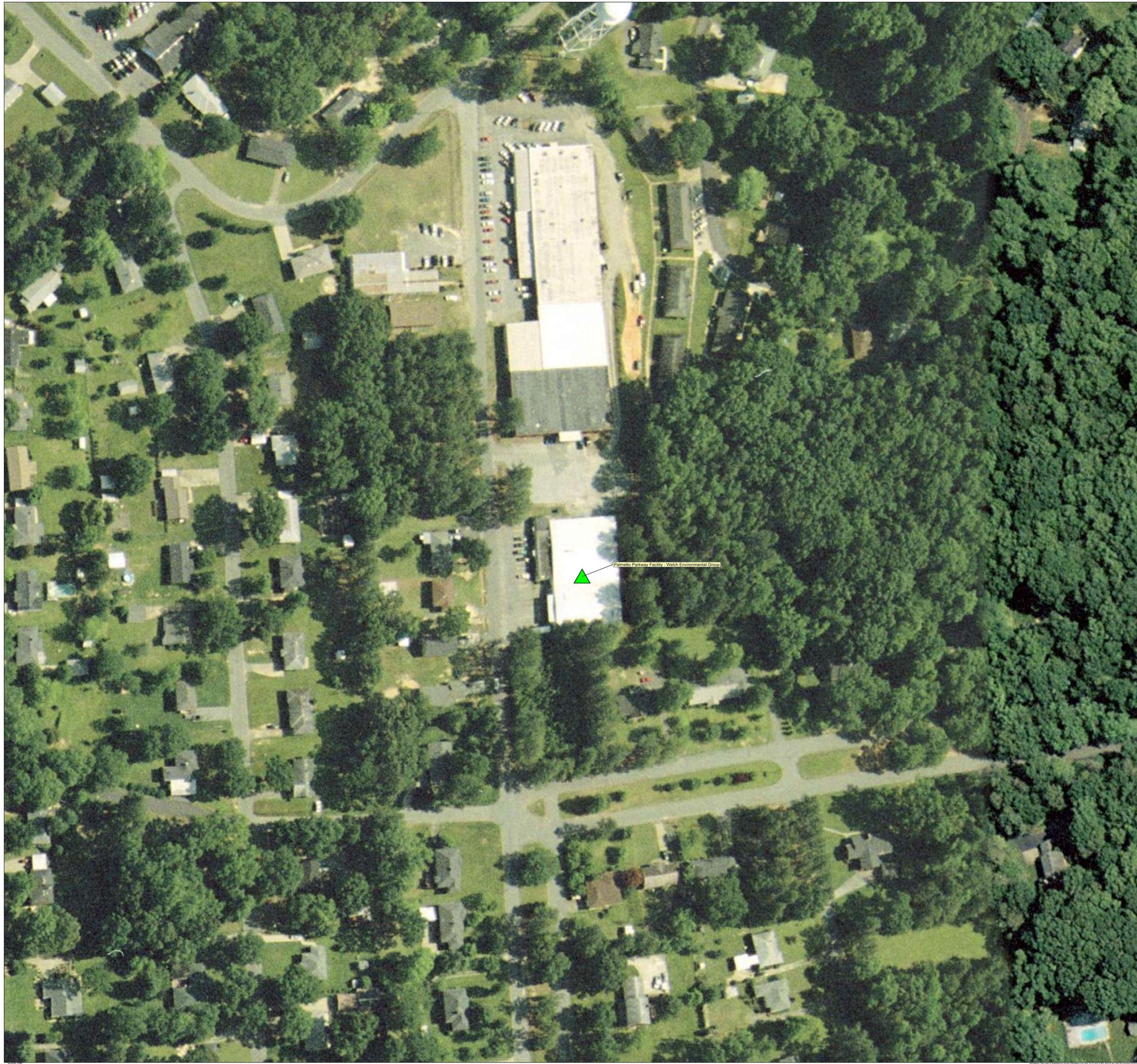


**WELCH GROUP ENVIRONMENTAL
PALMETTO PARKWAY FACILITY,
ANDERSON COUNTY,
SOUTH CAROLINA
TDD NO. TNA-05-003-0122**

**FIGURE 1
TOPOGRAPHICAL MAP**



United States Environmental Protection Agency



Legend

 Site Location

0 Feet 175 350



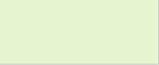
**WELCH GROUP ENVIRONMENTAL
PALMETTO PARKWAY FACILITY,
ANDERSON COUNTY,
SOUTH CAROLINA
TDD NO. TNA-05-003-0122**

**FIGURE 2
AERIAL MAP**

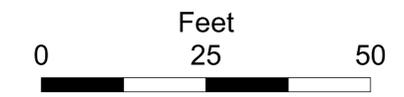


United States Environmental Protection Agency

Legend

 Area

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



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

**FIGURE 3
AREAS OF DECONTAMINATION MAP**



United States Environmental Protection Agency



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
Concrete Floor				
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
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110 Palmetto Parkway
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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
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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
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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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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
Concrete Floor				
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
Miscellaneous Items				
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 Fluorescence
- 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
Concrete Floor				
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
Pirlings				
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
Ceiling				
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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

Location	Date	Sample I.D	XRF Lead Screening Results	Units
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 Fluorescence
- 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
Concrete Floor				
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
Miscellaneous Items				
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
Wall Panels				
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
Red Steel				
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
Ceiling Insulation				
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
Pirlings				
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

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	BB	CC	DD			
1																																	1
2																																	2
3																																	3
																																	4
																																	5
																																	6
																																	7
																																	8
																																	9
																																	10
																																	11
																																	12
13																																	13
14																																	14
15																																	15
16																																	16
17																																	17
																																	18
																																	19

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

STREET V			
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=7.1	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
	P6A-100.5 ± 11.3		
P5A-273.6 ± 17.2	B-LOD=7.1	P7A-64.5 ± 9.7	P8A-340.0 ± 17.3
B-11.2 ± 5.1	C-LOD=7.4	B-129.8 ± 12.9	B-172.1 ± 14.0
C-81 ± 10.7	D-144.9 ± 13.4	C-26.1 ± 6.7	C-144.9 ± 12.1
D-26.1 ± 7.2	E-140 ± 12.0	D-222.5 ± 15	D-94.8 ± 10.6
E-32.1 ± 8.2	F-69.4 ± 9	E-76.3 ± 10.3	E-55.3 ± 8.0
F-41.1 ± 9.4	G-38.4 ± 12.3	F-43.1 ± 7.8	F-73.3 ± 9.6
G-183.3 ± 13.9	H-149.9 ± 13.9	G-131.5 ± 12.0	G-156.4 ± 13.6
H-32.6 ± 8.0	XXXXXXXXXX	H-135.7 ± 11.8	H-151.9 ± 13.0
XXXXXXXXXX		E-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 ± 7.9

B-122.1 ± 12.6

C-301 ± 18.5

D-107.1 ± 11.3

E-11.3 ± 6.2

F-91.0 ± 10.5

G-90.6 ± 10.6

H-147.3 ± 13.4

G2A-204.5 ± 15.4

B-176.0 ± 14.0

*C-551.8 ± 22.7 ~~~~~ 137.9 ±

D-49.5 ± 8.1

*E-46.8 ± 8.1

F-21.2 ± 7.0

G-46.8 ± 8.6

H-55.4 ± 8.8

I-159.3 ± 14.0

J-90.4 ± 10.8

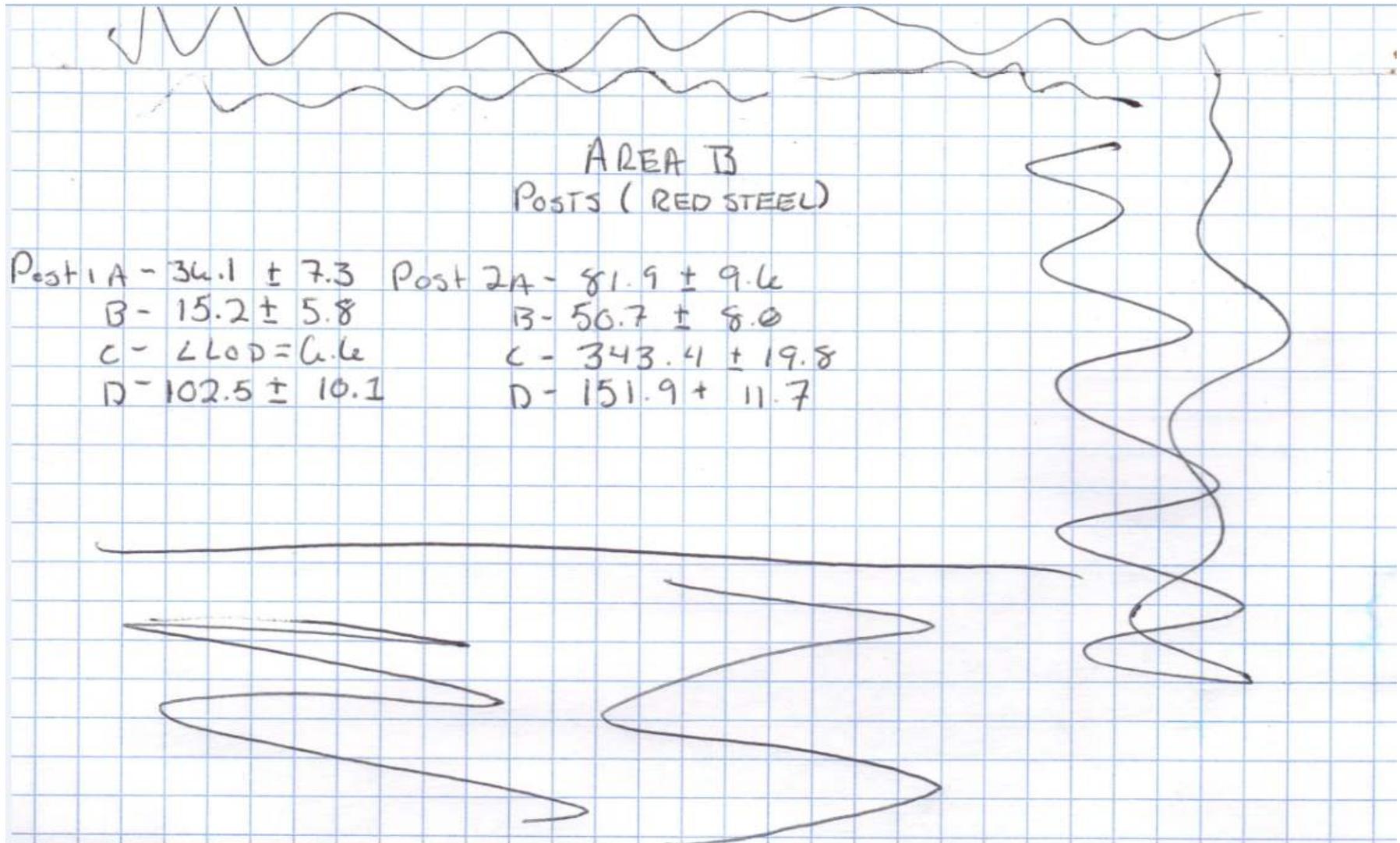
K-145.3 ± 12.8

L-48.5 ± 8.5

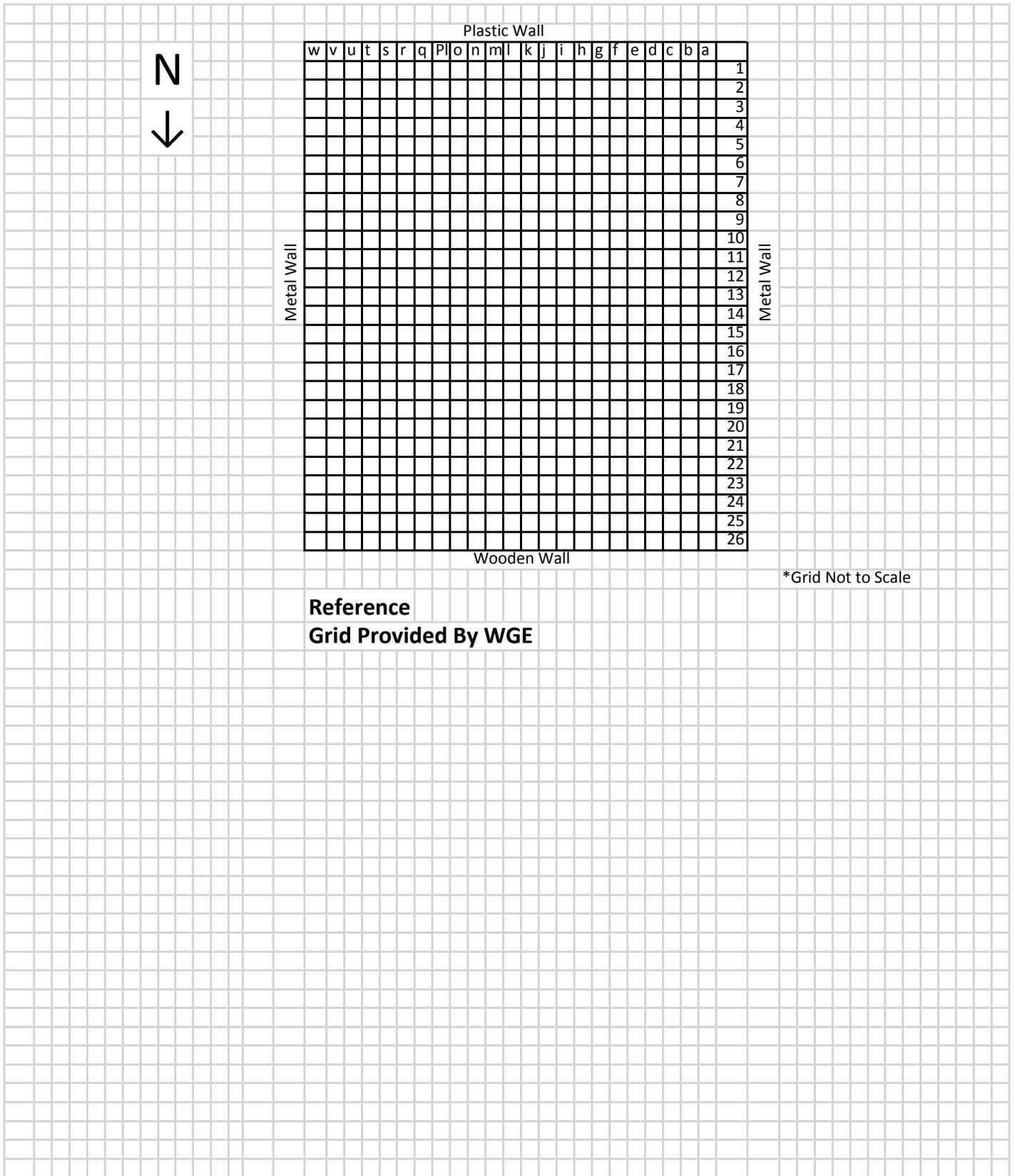
M- < LOD = 75

Reference 3

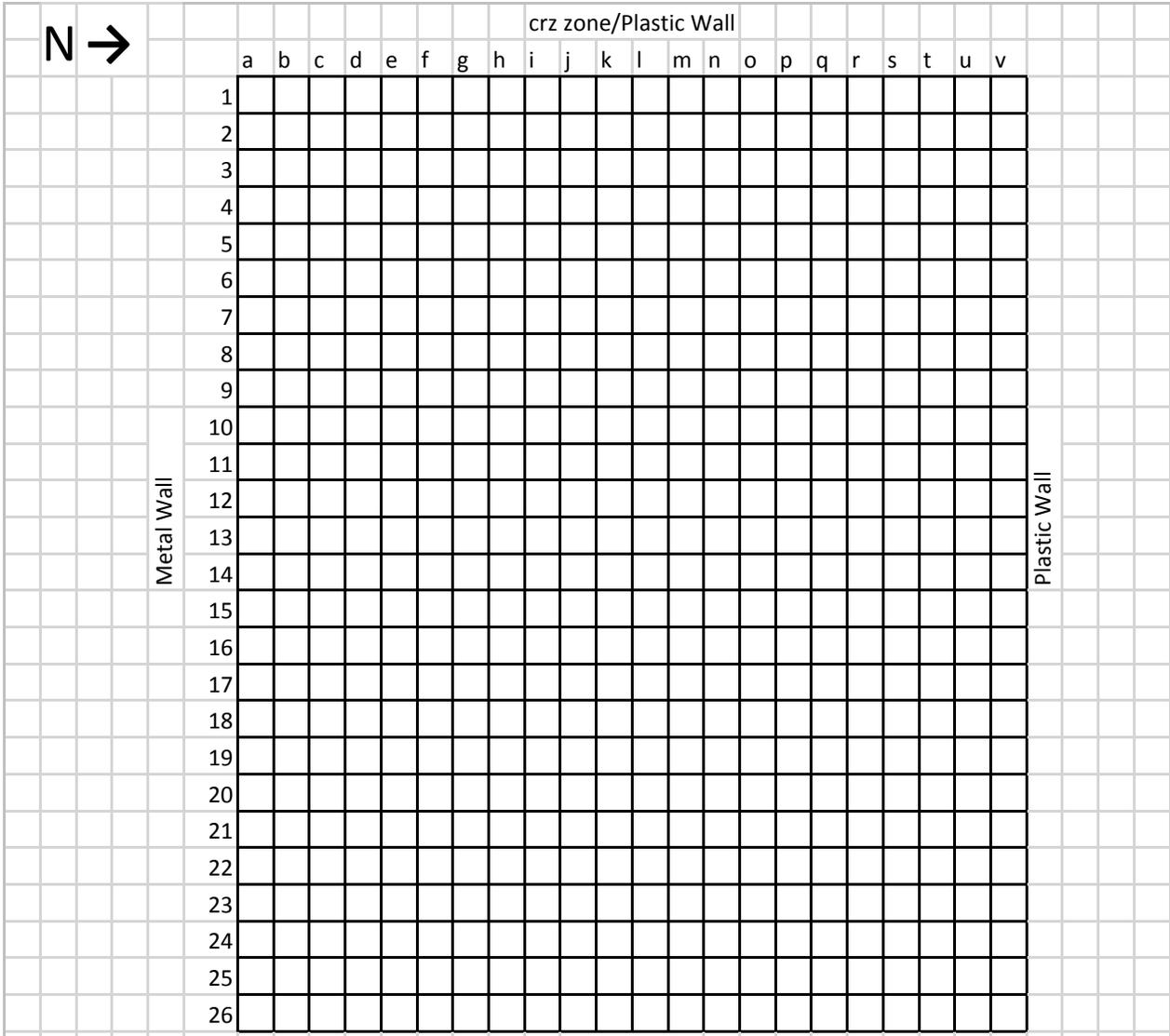
Supporting Field Data Provided by WGE



Area C Floor



Area B Floor



Metal Wall

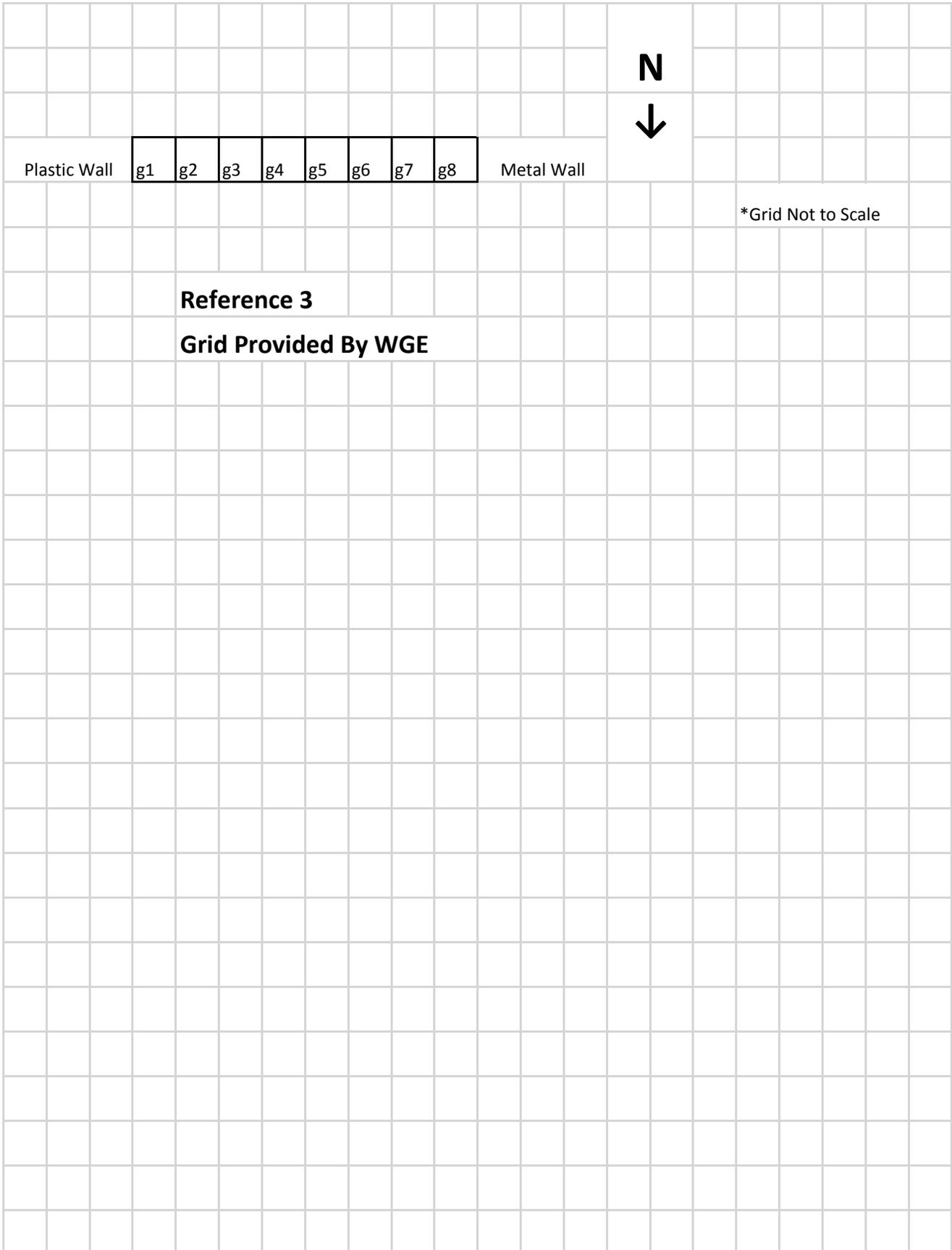
Plastic Wall

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

N

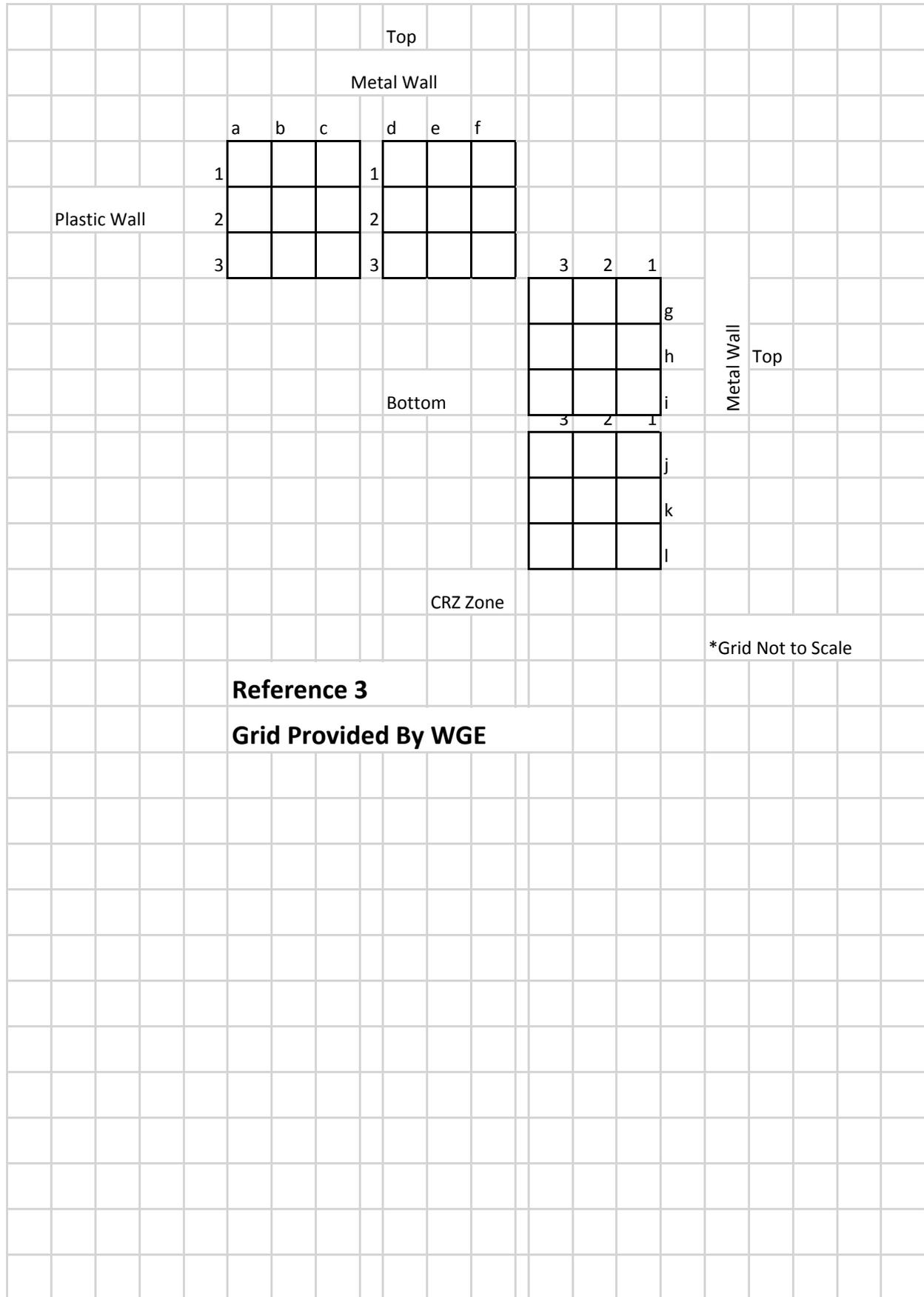


*Grid Not to Scale

Reference 3

Grid Provided By WGE

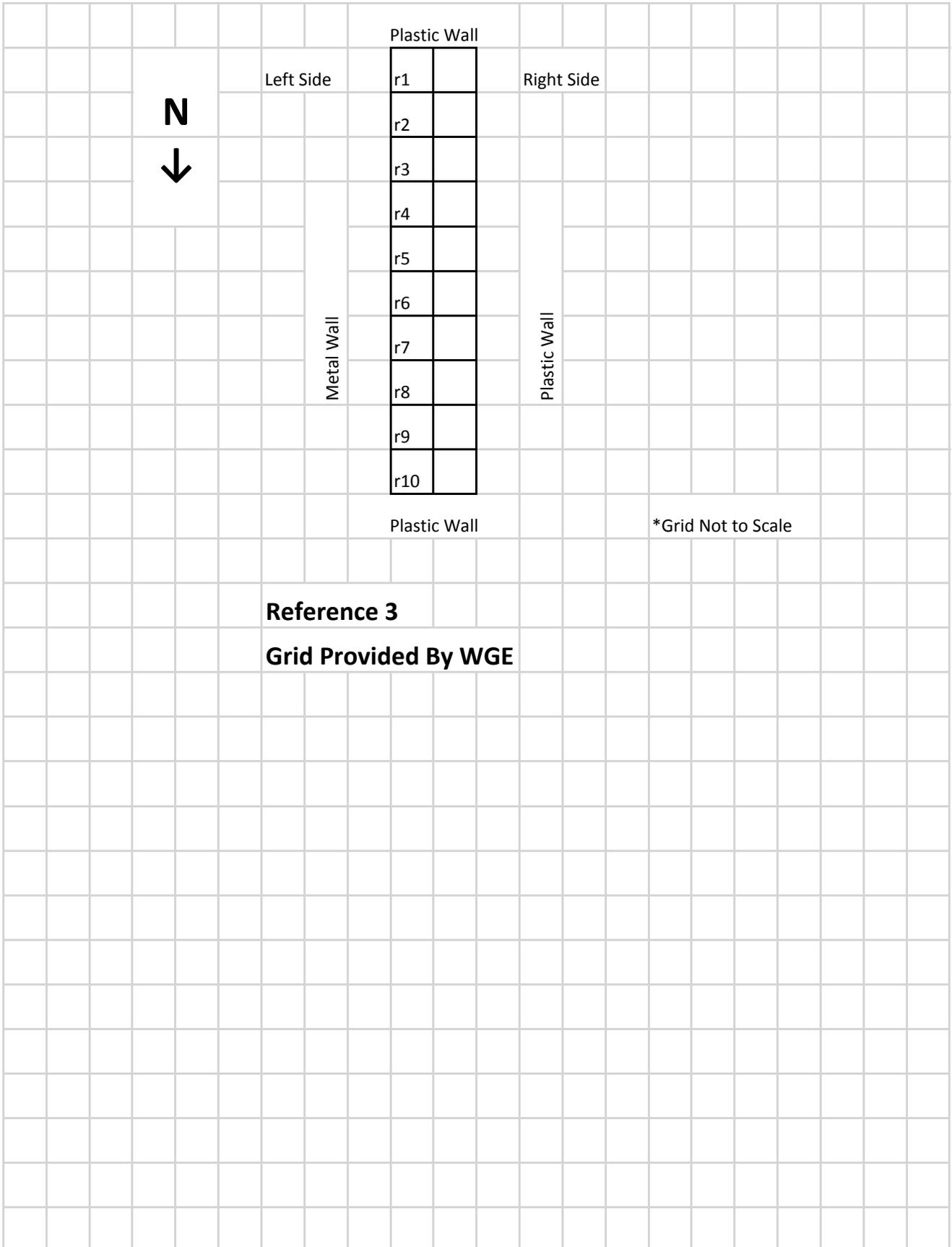
Area B Walls



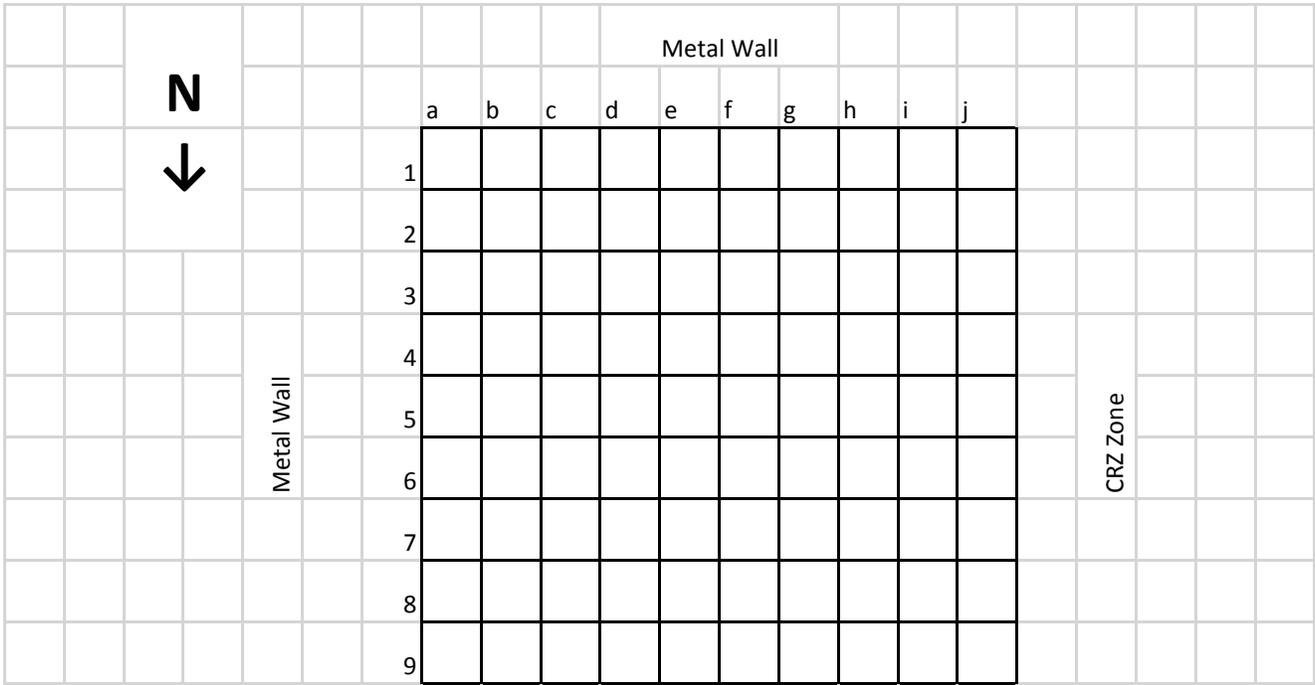
Reference 3

Grid Provided By WGE

Area B Red Steel



Area B Purlins

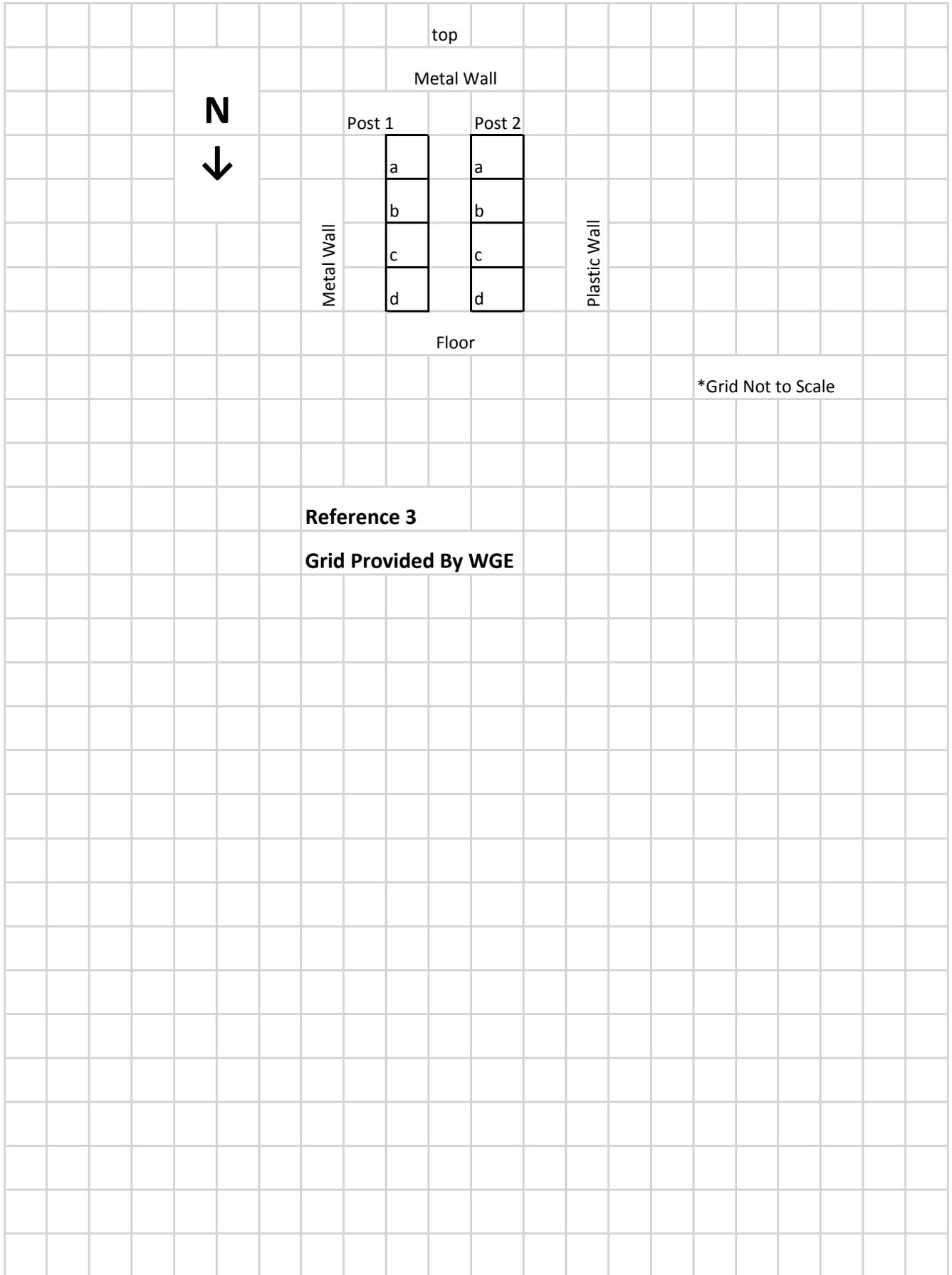


*Grid Not to Scale

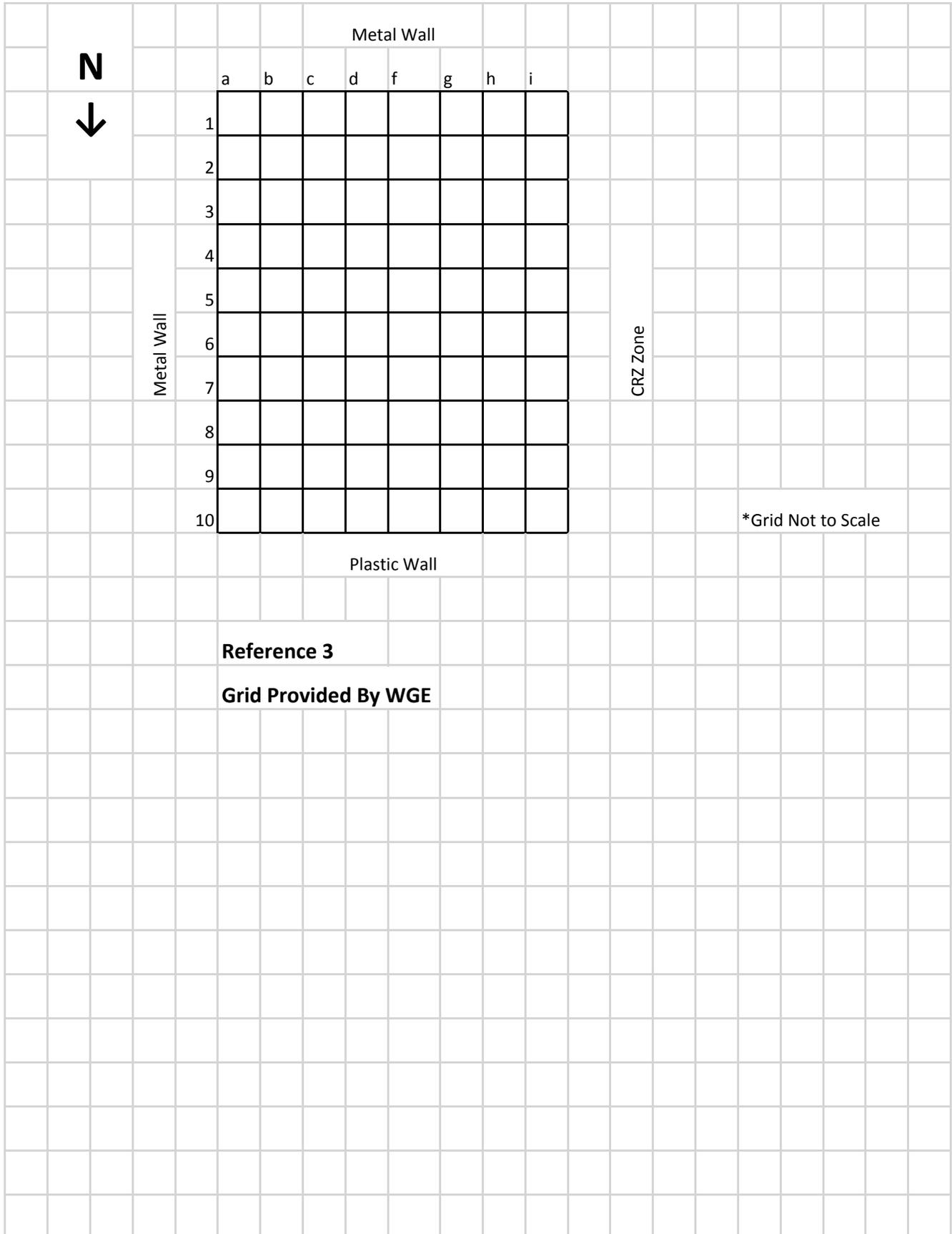
Reference 3

Grid Provided By WGE

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

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:

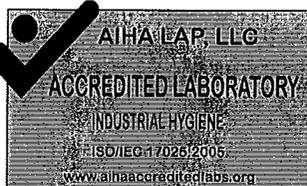
Palmetto Site - 11.06.001

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 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 ³	3/10/2011 iacevedo

<i>Client Sample Description</i>		PS-8 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 ³	3/10/2011 iacevedo

Definitions:

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

**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 ³ :				
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/m³ to 0.38 mg/m³.

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 time</u> (min)	<u>concentration of lead</u> (mg/m ³)
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 time</u> (min)	<u>concentration of lead</u> (mg/m ³)
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: HEPAACO
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:
--	---	-----------------------------------

BILL THIRD PARTY FREIGHT CHARGES TO:	REMIT TO (COD):	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)
---	------------------------	--

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	
	<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.

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.

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 _____

ACCESSORIAL SERVICES REQUESTED Ins. Amount

ARN CA HYD IDC RDC IND OVL OV2 EXD

Note: Items excluded from coverage include used articles, household goods, personal effects, and other prohibited commodities shown in OD Rules 100, Item 760. 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 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.

SHIPPER: Welch Group Glen Welch DATE: 10/25/11 HAU RECEIVED TRAILER NO: 461963

AUTHORIZED SIGNATURE (Shipper): _____ CARRIER: OLD DOMINION FREIGHT LINE, INC. HEPAACO

ARRIVAL
 HEPA CO
 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:

BILL THIRD PARTY FREIGHT CHARGES TO:	REMIT TO (COD):	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)
---	------------------------	--

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

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 (Ins. Amount)

ARN CA HYD IDC RDC IND OVL OV2 EXD

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 Welch DATE: 10/25/11 HAZ RECEIVED TRAILER NO: 461963

AUTHORIZED SIGNATURE (Shipper) CARRIER: OLD DOMINION FREIGHT LINE, INC. HEPA CO

CARRIER: HE PACO
 EPA ID # NCO 956194306

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 804-462-0405 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 Ins. Amount
 ARN CA HYD IDC RDC IND OVL OV2 EXD

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 PACO

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

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

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

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

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. 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.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 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

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

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 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

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

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

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

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

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

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

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

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

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.

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

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

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](#)).

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

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

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 tavasco 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.

Phillips Recoveries, Inc.

508 Cherokee Rd. Pelzer, SC 29669

Phone: 864-947-6861

Fax: 864-947-4002

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)

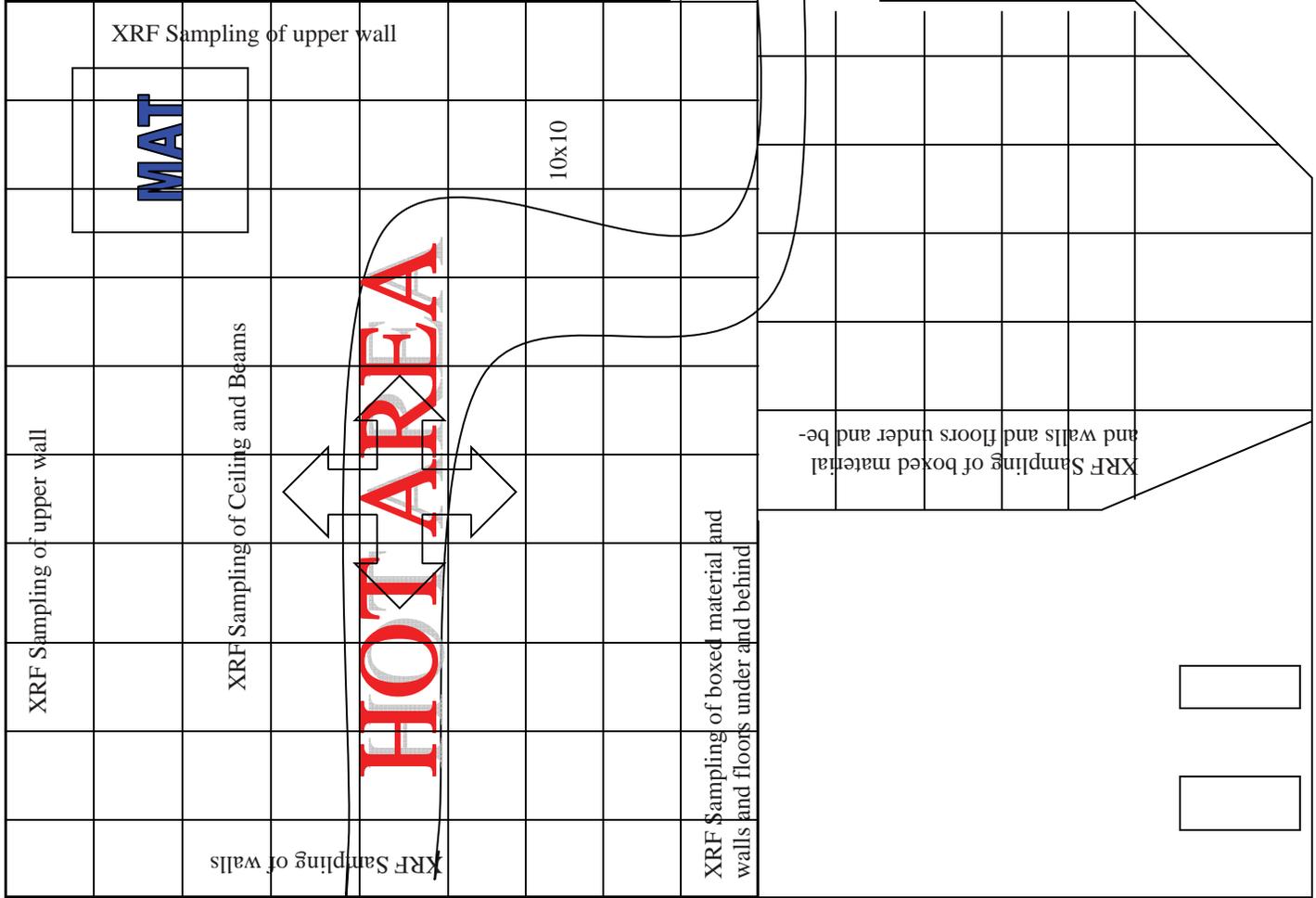
Cc: Leo Francendese

Glenn Welch

Footnote (1) Optional, as applicable

Clean area

C - E A R A R E A



Traffic area with plastic path

HOT AREA

HOT AREA

MAT

XRF Sampling of upper wall

XRF Sampling of Ceiling and Beams

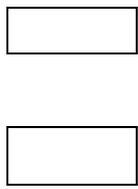
XRF Sampling of upper wall

XRF Sampling of walls

XRF Sampling of boxed material and walls and floors under and behind

XRF Sampling of boxed material and floors under and behind

10x10





Trip to:

An Med Health Medical Center
800 N Fant St

Anderson, SC 29621

(864) 512-1000

11.34 miles

17 minutes

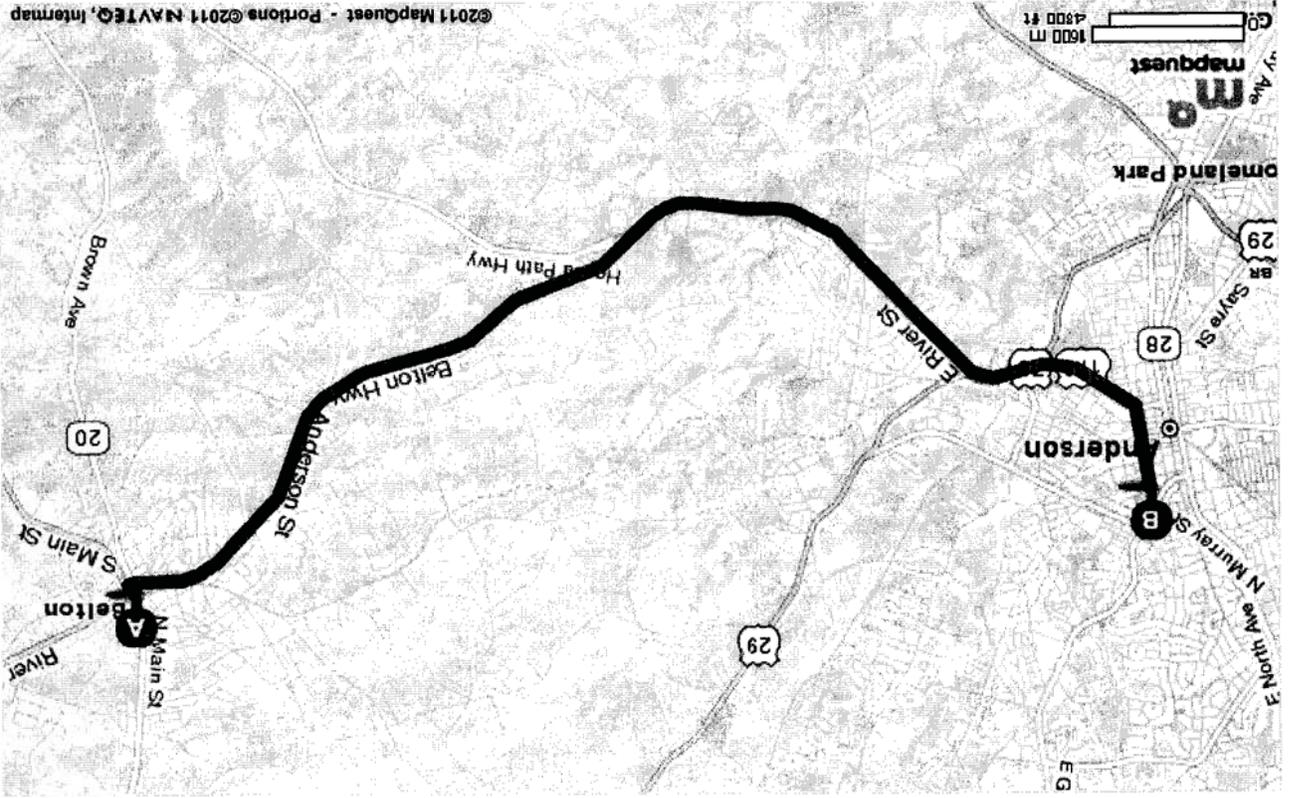
- 1. Start out going EAST on BREAZEALE ST / SC-63 toward SC-20 / N MAIN ST. Go 0.02 MI
- ➔ 2. Take the 1st RIGHT onto N MAIN ST / SC-20. If you are on SC-247 and reach MAIN STREET SQ you've gone a little too far. Go 0.07 MI
- ➔ 3. Take the 1st RIGHT onto ANDERSON ST / US-178 / US-76 W. follow US-178 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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Directions and maps are informational only. We make no warranties on the accuracy of their content, road conditions or route usability or expeditionness. You assume all risk of use. MapQuest and its suppliers shall not be liable to you for any loss or delay resulting from your use of MapQuest. Your use of MapQuest means you agree to our Terms of Use

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

Printed name: C Cummings Gray Date: _____

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/m³ 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)

Telephones at this site are located in the following areas:
--

Each individual

A current list of emergency contact numbers is posted in the following locations:
--

800-947-6805

Two-way radios are available in the following locations:

The following people will carry two-way radios:
--

Other forms of communication on this site include:
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.

Table 3-6 Site Communication – Hand Signals	
Signal	Meaning

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

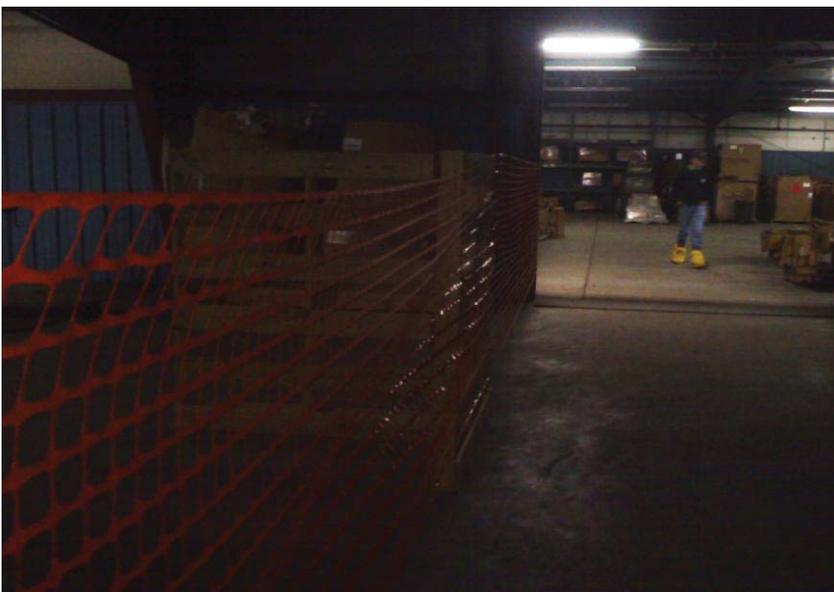
WGE Belton, SC - PALMETTO Site

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

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 28th.

*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

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 re-cleaned 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 suits 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

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

Welch Group Environmental

118 White Oak Road

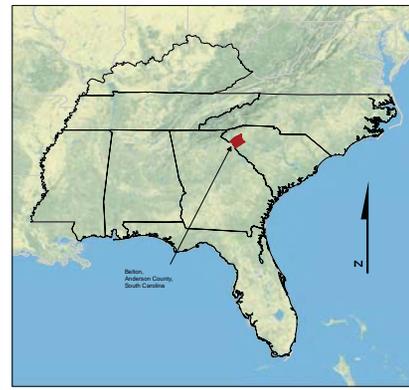
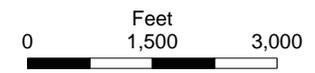
Belton, SC 29627

864-446-0405



Legend

▲ Site Location



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

**FIGURE 1
 TOPOGRAPHICAL MAP**



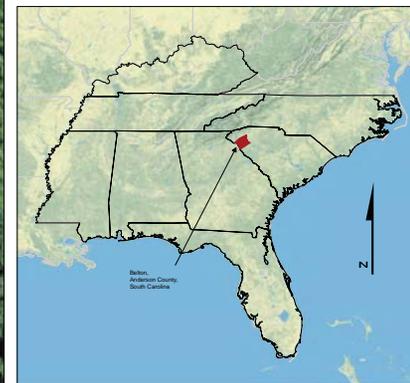
United States Environmental Protection Agency



Legend

▲ Site Location

0 Feet 175 350



**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

Legend

All lead concentrations measured in parts per million.

An X-ray Fluorescence (XRF) elemental detector was used to determine the levels of lead concentrations

Map not to scale

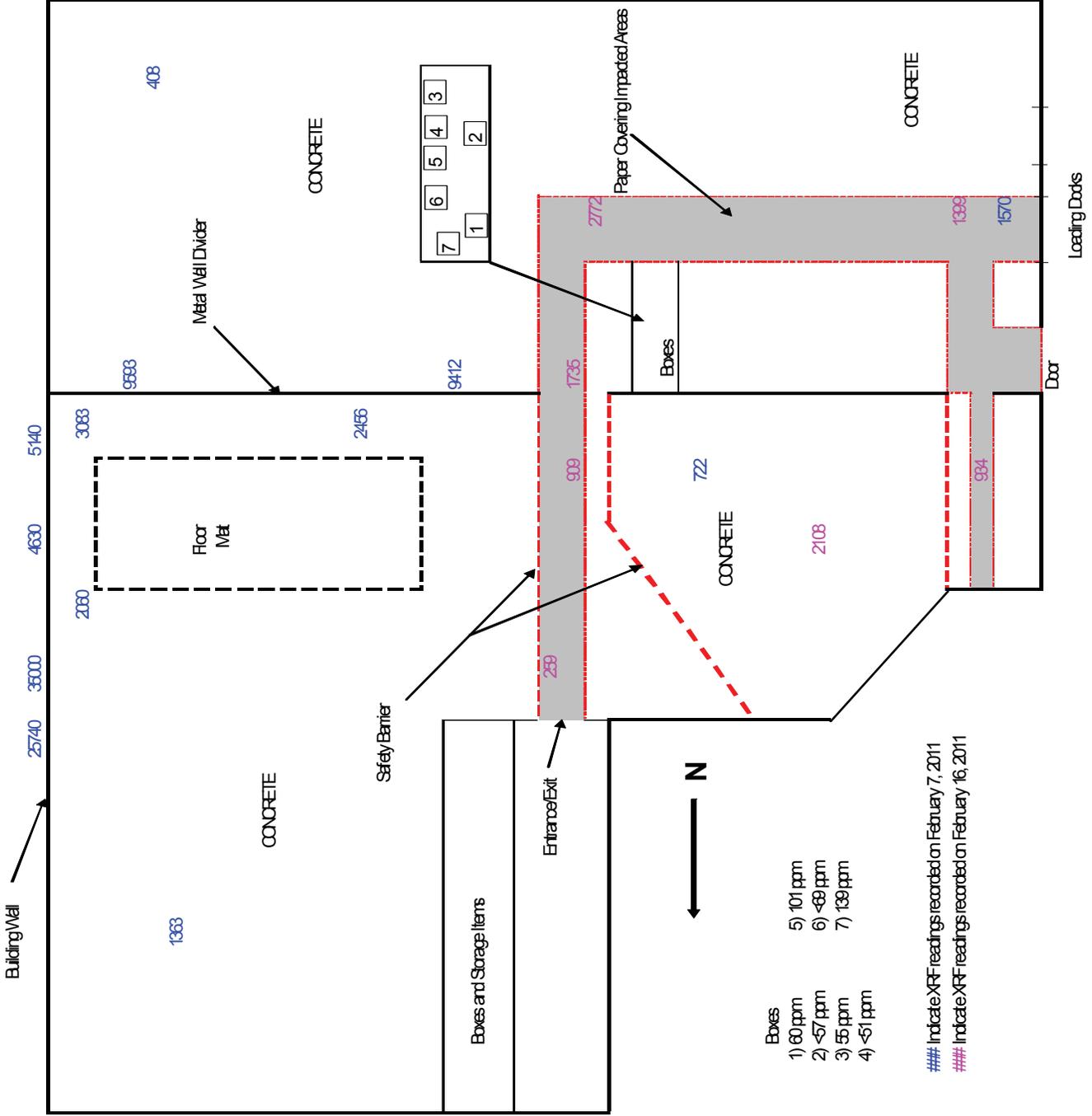


WELCH GROUP ENVIRONMENTAL
PALMETTO PARKWAY FACILITY,
ANDERSON COUNTY,
SOUTH CAROLINA
TDD NO. TNA-05-003-0122

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



United States Environmental Protection Agency



Indicate XRF readings recorded on February 7, 2011
Indicate XRF readings recorded on February 16, 2011

Legend

All lead concentrations measured in parts per million.

An X-ray Fluorescence (XRF) elemental detector was used to determine the levels of lead concentrations

Map not to scale

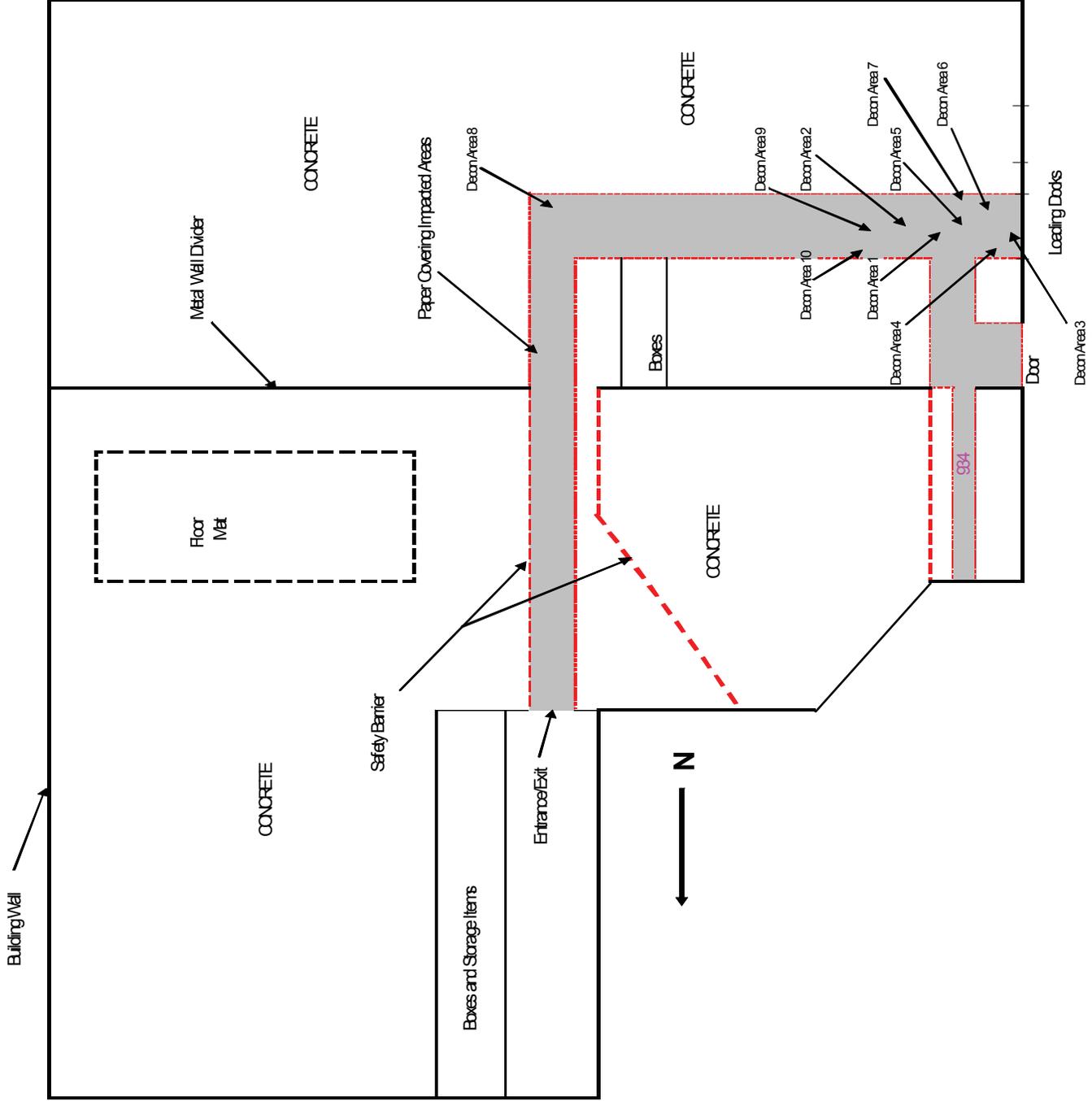


WELCH GROUP ENVIRONMENTAL
PALMETTO PARKWAY FACILITY,
ANDERSON COUNTY,
SOUTH CAROLINA
TDD NO. TNA-05-003-0122

FIGURE 4
FEBRUARY 21 & 22, 2011 PILOT
TEST DECONTAMINATION
LOCATIONS



United States Environmental Protection Agency



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 BUMPING CAUSED FIRE AND WAS SHUT DOWN BY LOCAL FIRE DEPT. EPA OSC INDICATED WILL MAKE ARRANGEMENTS TO VISIT SITE

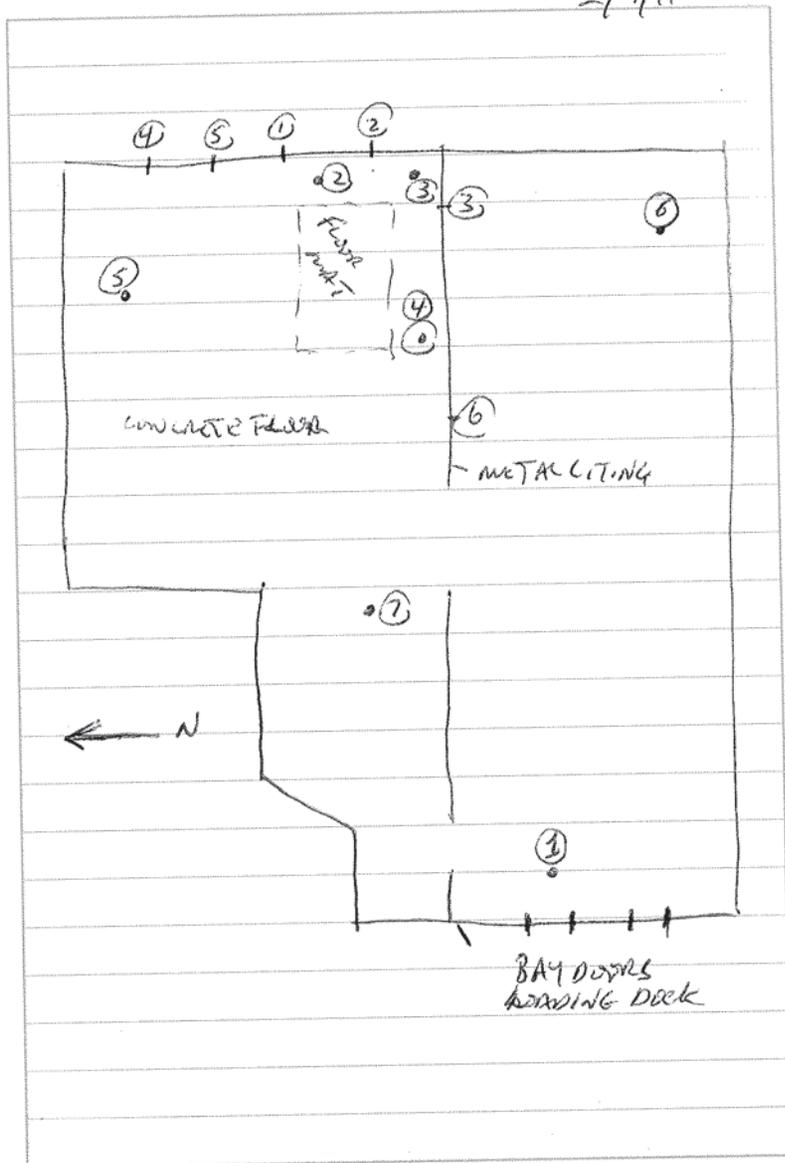
Scale: 1 square=_____

2/7/11

1430 - ARRIVE @ 110 PARKWAY W/ EPA OSC/MR. WELCH, COMMINS 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} WHERE SPACE IS USED; ^{TO} 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 CREATING 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 WADING 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 WITH 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 951 1546
- 2) BUILDING WALLS - Pb - 5140 ppm \pm 949 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 - STAIR / ERM OFFSITE

Scale: 1 square = _____

2/11/11

1130 - MEETING w/ EPA, SCDHEC, MR. WOLCH,
CUMMINS GARY/WOLCH CONTRACTOR
THE EPA INDICATED TO MR. WOLCH THAT
THE EPA WOULD ALLOW CLEANUP OF
BUILDING TO 2,200 PPM; HOWEVER
THE STATE ALLOW 400 PPM; IF MR. WOLCH
WOLD TO CLEANUP TO 220 PPM THEN THE
SCDHEC WOULD PLACE A DEED RESTRICTION
ON THE PROPERTY; MR. WOLCH INDICATED HE
WILL CLEAN BUILDING AREA TO 400 PPM
EPA EXPLAINED AREA WILL HAVE TO BE
ZONED OFF, MAINTAINED AND EVENTUALLY
DECONTAMINATED AND TESTED TO 400 PPM;
MINIMIZE H₂O DURING CLEANING; SECURE
SITE; EPA ALLOWED WASTE GENERATION TO
BE MOVED TO ANDERSON FACILITY; AREA
OF WORK AREA APPROX 3000 SQ FT
MR. WOLCH INDICATED NO ~~HOUSE~~^{WAREHOUSE} ACTIVITY ON WEEKENDS
1240 ALL PARTIES OFFSITE

Scale: 1 square=_____

2/15/11

Sunny 62°F

1330 - LOANE ANDERSON FACILITY FOR
PALMISTO FACILITY

1400 - MET w/ MR. WOLCH CONTRACTOR (PHILIP
PERVONY), GARY (IH) / MR. WOLCH REGARDING
SEW AND THE IH TO EVALUATE ~~PPM~~ 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 PARAMETRO SITE

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

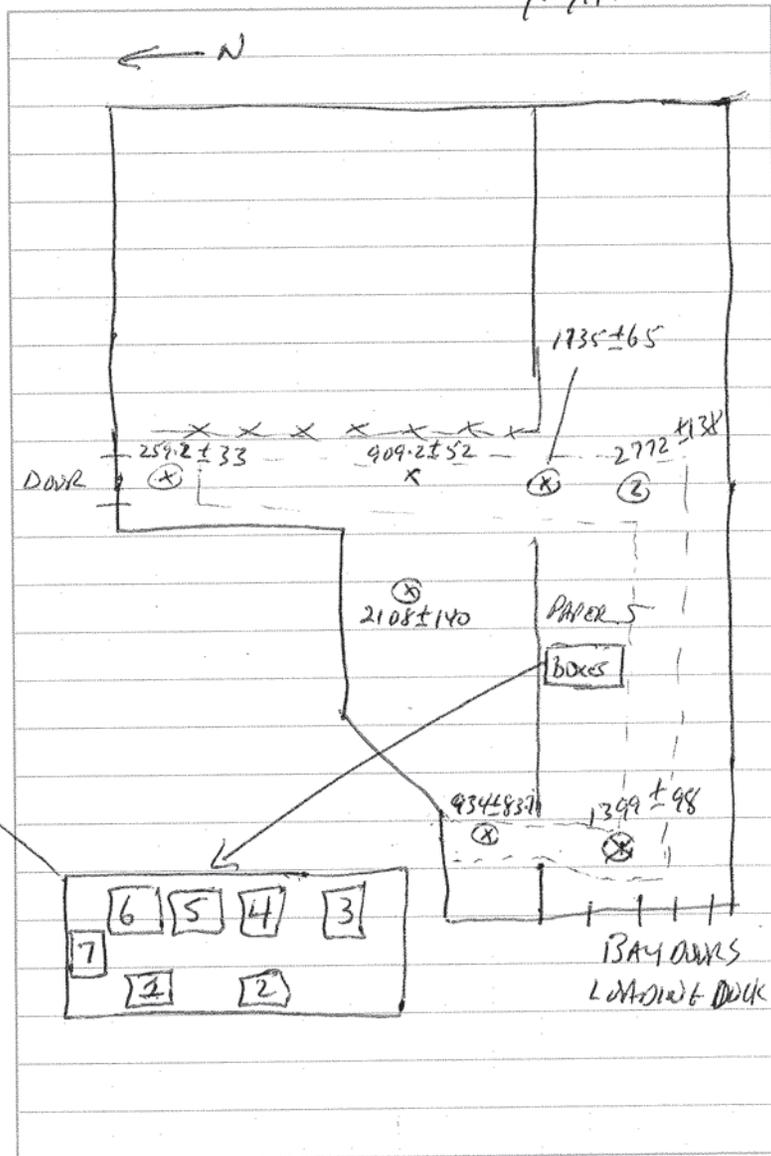
1200 - BEGIN XRF ON FLOOR AND BOXES
SEE FIGURE FOR LOCATION

- 1) 60.2 ± 30.8 - Pb - 1241 #33
- 2) ND < 57 - Pb - 1244 #34
- 3) 55.2 ± 25.6 - Pb - 1248 #35
- 4) ND < 51 - Pb - 1252 #37
- 5) 101 ± 64.5 - Pb - 1255 #38
- 6) ND < 69 - Pb - 1258 #39
- 7) 138.9 ± 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 / SCHEC (PAUL WILKE) LEAVE
AND ORIGIN FACILITY TO CHECK CONDITIONS
OF BOTTOM SIDE

1130 - ARRIVE @ BOLTON (PARAMETIC SITE)
START SHOWED SCHEC SECURITY UNASSURED
START UNCOVERED Q/A/QC FLOOR PAPER USED
TO SECURE FLOOR FROM PERSONNEL

1140 - SCHEC OFFSITE, START TOOK PICTURES
OF FLOOR, PAPER USED TO SECURE FLOOR ~~TRACT~~
NO BREAKS

1145 - START OFFSITE.

Scale: 1 square=_____

2/18/11

Sunny 59°F

0900 - ARRIVE @ SITE TO CHECK ON BARBICOR
 PLANT IN FRONT OF WAREHOUSE; FEWER THAN
 SIGNS OF USE; FRUIT AND BRANCHES; PICTURES
 TAKEN

0930 - LOOKED WAREHOUSE; START VISIT

Scale: 1 square = _____

2/21/11

Sunny 65°F / WINDY

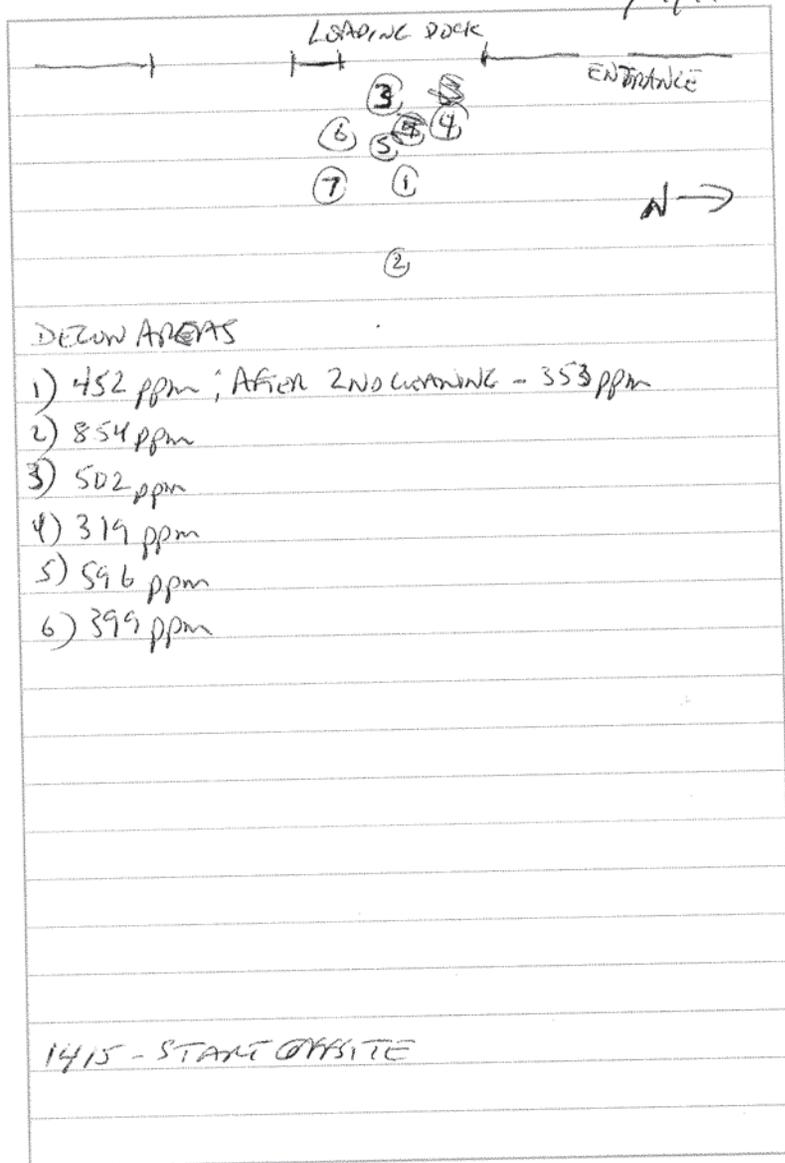
~~0900~~ 1000 - ONSITE - CONTRACTOR ONSITE

PHILIPS (POZOLCAY)

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

Scale: 1 square = _____

2/22/11



Scale: 1 square=_____

2/22/11

Sunny 72°F

0200 - ARRIVE @ SITE

1215 - CREW BEGINS WORKING ON CLEANING FLOOR.

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

1404 - BEGINS 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

#61

#60

Scale: 1 square=_____

1445 - HAD DISCUSSIONS w/ MR. WALCH 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 HHS Plan.

0930 Calibrate PDR 1600

Cal: OK, Zeroed in bag, 0.34 mg/m³ 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/m³.

1400 STACU Conducted preliminary screening of the floor

#01 422.8 ppm Pb +/- 60.3

#02 388.2 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 Shetty 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 POLRFPs.

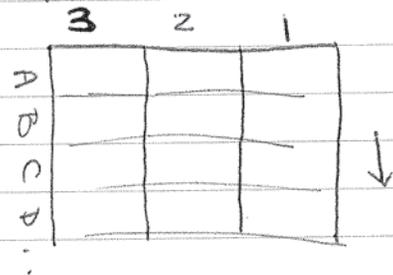
Scale: 1 square=_____

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 ~~rows~~ ^{columns} 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 clean efforts using vinegar. START continues to spot check sprayed locations by ACT and collecting PIDL 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 clean 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. STARC 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~~ allow the vinegar to sit (to dissolve metal) and scrub w/ wire brushes.

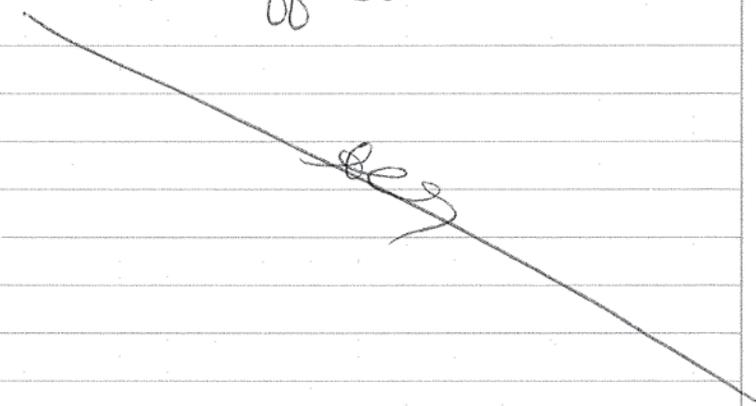
~~the~~

Scale: 1 square=_____

3/2/11

1900 STARC 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



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

Site Name: WGE Palmetto Facility **Date:** February 11, 2011
Location: Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129
Photographer: Jerry Partap, START
Subject: View of WGE Palmetto facility.



Official Photograph No. 2

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 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

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: Area secured from warehouse personnel.



Official Photograph No. 8

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 storage area secured from warehouse personnel.



Official Photograph No. 9

Site Name: WGE Palmetto Facility **Date:** February 17, 2011
Location: Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129
Photographer: Jerry Partap, START
Subject: View of secured warehouse flooring.



Official Photograph No. 10

Site Name: WGE Palmetto Facility **Date:** February 17, 2011
Location: Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129
Photographer: Jerry Partap, START
Subject: Additional areas of secured warehouse flooring.



Official Photograph No. 11

Site Name: WGE Palmetto Facility **Date:** February 17, 2011
Location: Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129
Photographer: Jerry Partap, START
Subject: Additional areas of secured warehouse flooring.



Official Photograph No. 12

Site Name: WGE Palmetto Facility **Date:** February 17, 2011
Location: Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129
Photographer: Jerry Partap, START
Subject: Additional areas of secured warehouse flooring.



Official Photograph No. 13

Site Name: WGE Palmetto Facility **Date:** February 17, 2011
Location: Belton, Anderson County, South Carolina **TDD No:** TNA-05-001-0129
Photographer: Jerry Partap, START
Subject: 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 28th.

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 11th 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 (ft²) 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 ft² 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](#)).

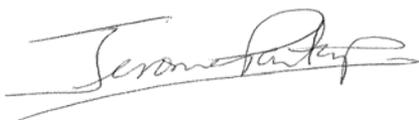
On February 28, 2011 through March 2, 2011, START observed WGE contractors continue with the decontamination Pilot testing activities ([Revised RAWP](#)). WGE contractors monitored air particulates while cleaning activities were being conducted ([Air Monitoring Data](#)). There were sections of the warehouse pathway where concentrations were still above 400 ppm. WGE contractors used a tanvasco 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,



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

EMSL Analytical, Inc.

<http://www.emsl.com>

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

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:

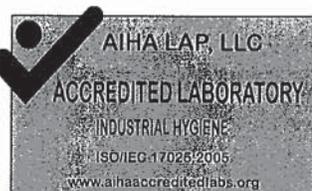
Palmetto Site - 11.06.001

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

Client Sample Description PS-7 Juan Agustin *Collected:* 3/4/2011 *Lab ID:* 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 ³	3/10/2011	iacevedo

Client Sample Description PS-8 Work Area Center *Collected:* 3/4/2011 *Lab ID:* 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 ³	3/10/2011	iacevedo

Definitions:

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

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

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 tvasco 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

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

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

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

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 suits 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

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 suits 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

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

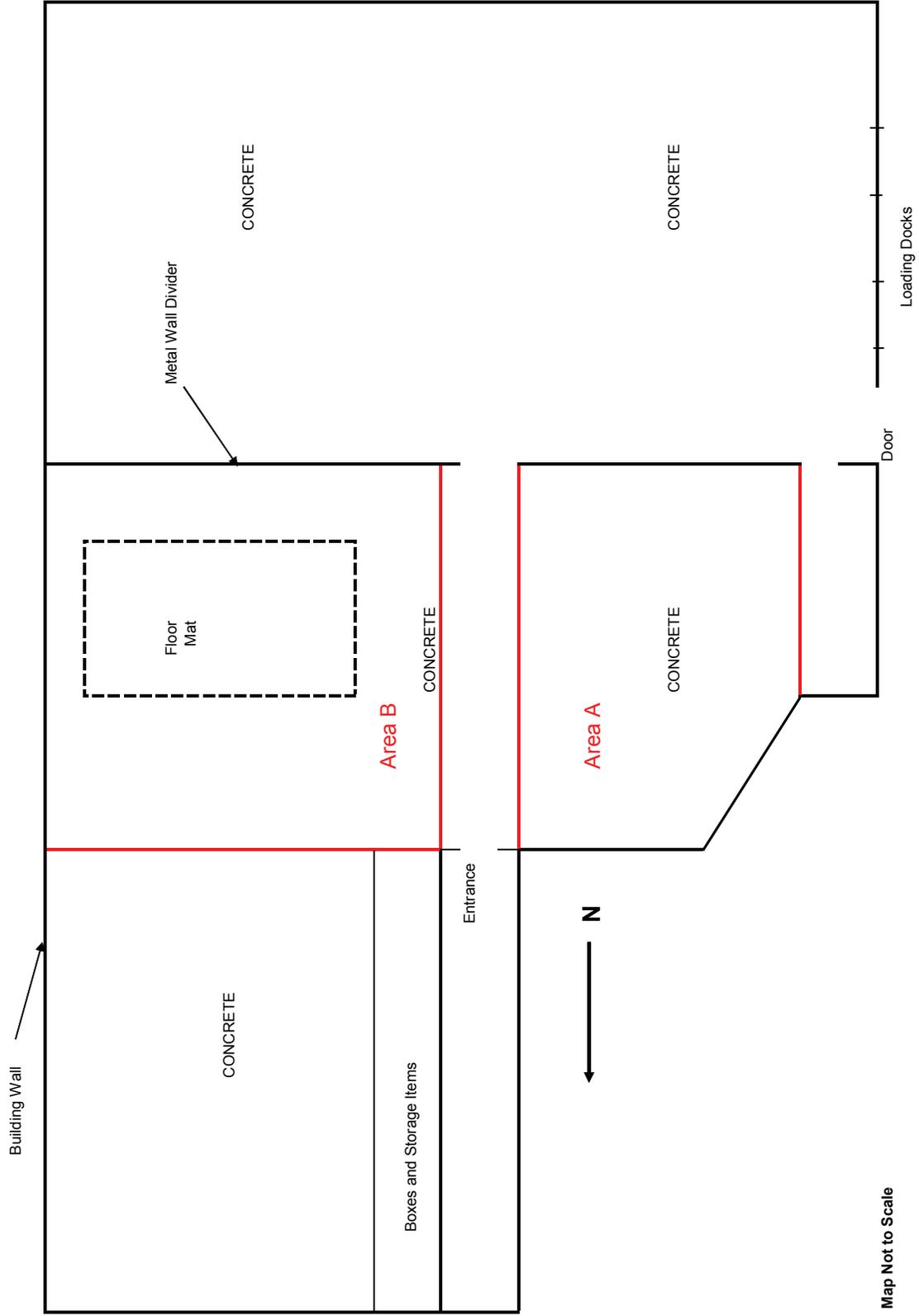
Welch Group Environmental

118 White Oak Road

Belton, SC 29627

864-462-0405

WELCH GROUP ENVIRONMENTAL - PALMETTO FACILITY
Areas of Decontamination



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

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 suits 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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 (ft²) 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 ft² 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.

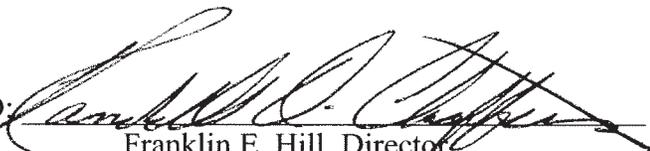
IX. REFERENCES

http://www.epaossc.org/site/site_profile.aspx?site_id=6682

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:  DATE: 5/12/11
Franklin E. Hill, Director
Superfund Division

DISAPPROVED: _____ DATE: _____
Franklin E. Hill, Director
Superfund Division

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 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

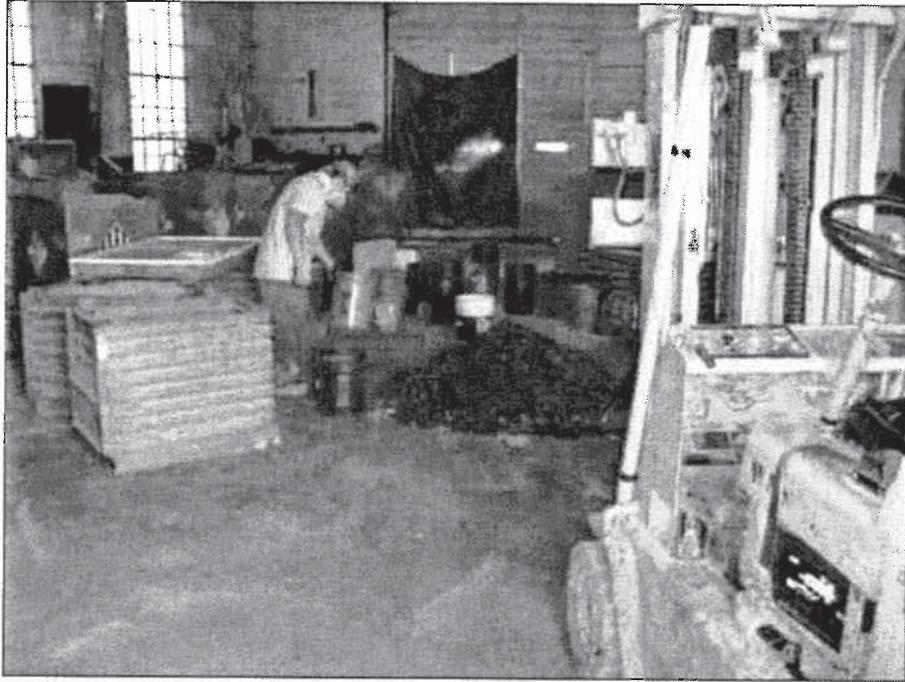
and he didn't own the property and he would have to call the property owner to see if we could get access. Mr. Welch called the property owner and the property owner said he was in Talledega, AL and he couldn't let us on the property until Monday. I then called Chris McCluskey and told him about the 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 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.

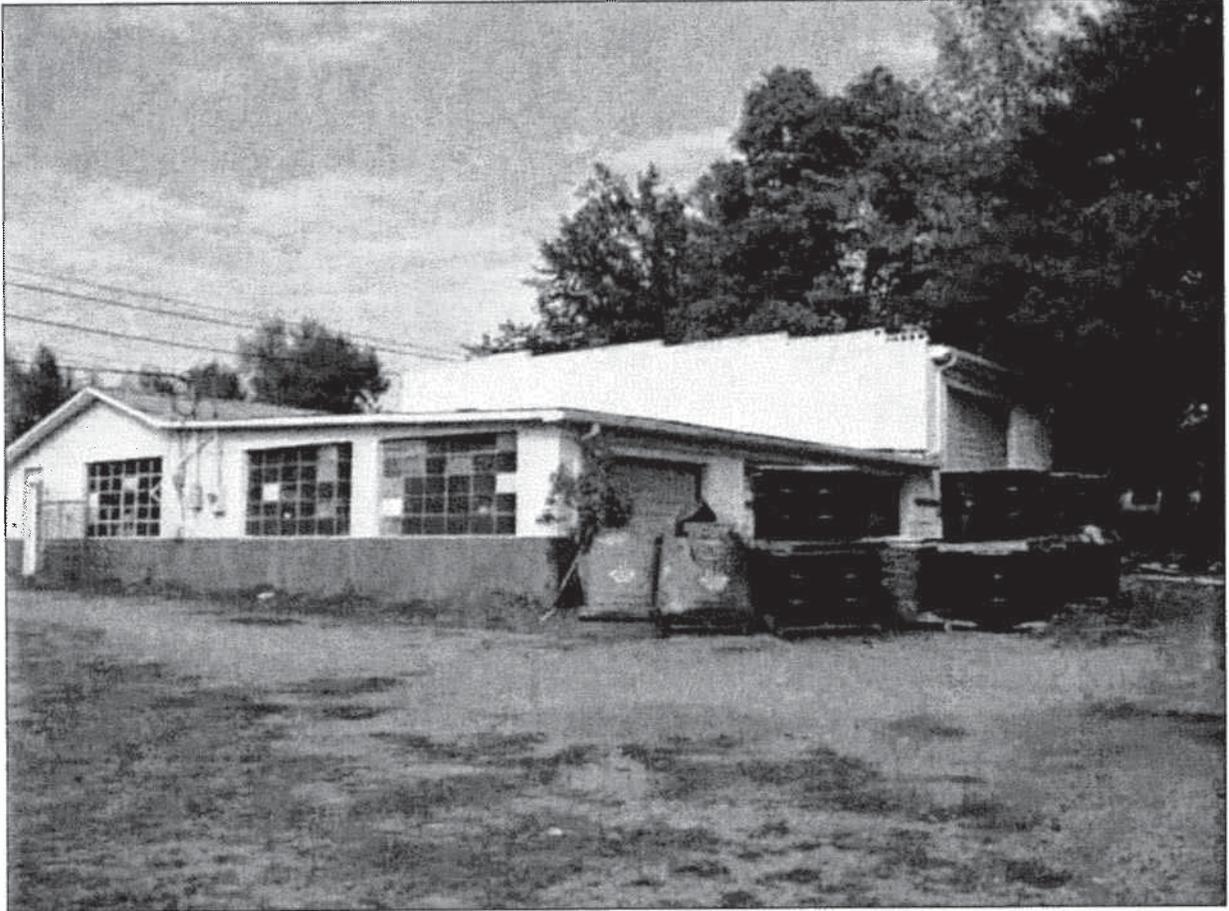
11/4/2010

- 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





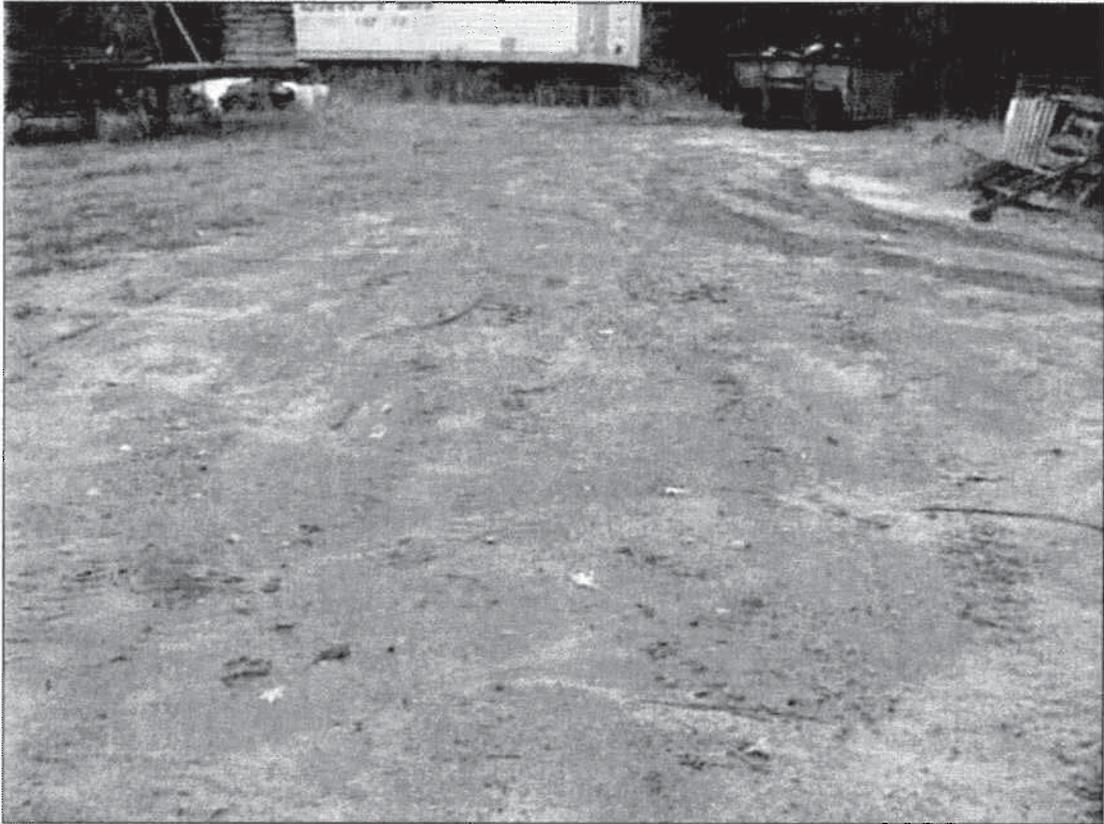


WELCH GROUP ENVIRONMENTAL – FAIR PLAY FACILITY

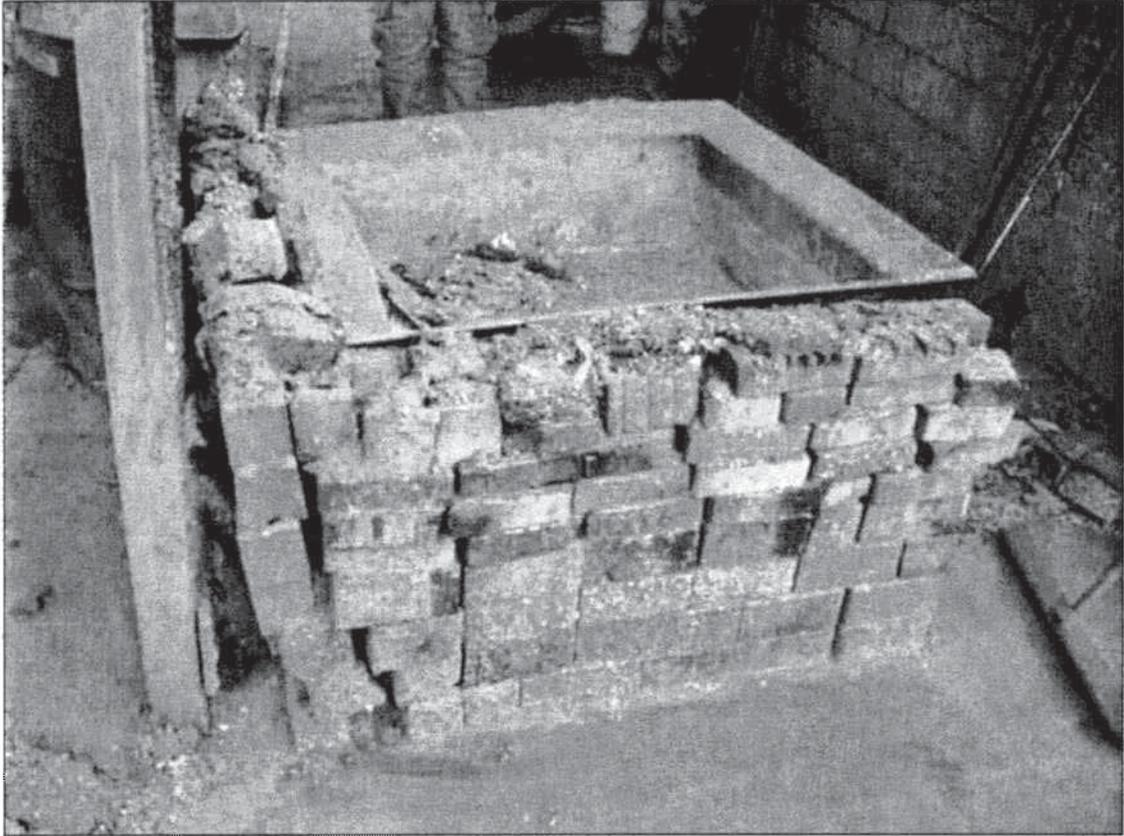




Leftover processed material



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



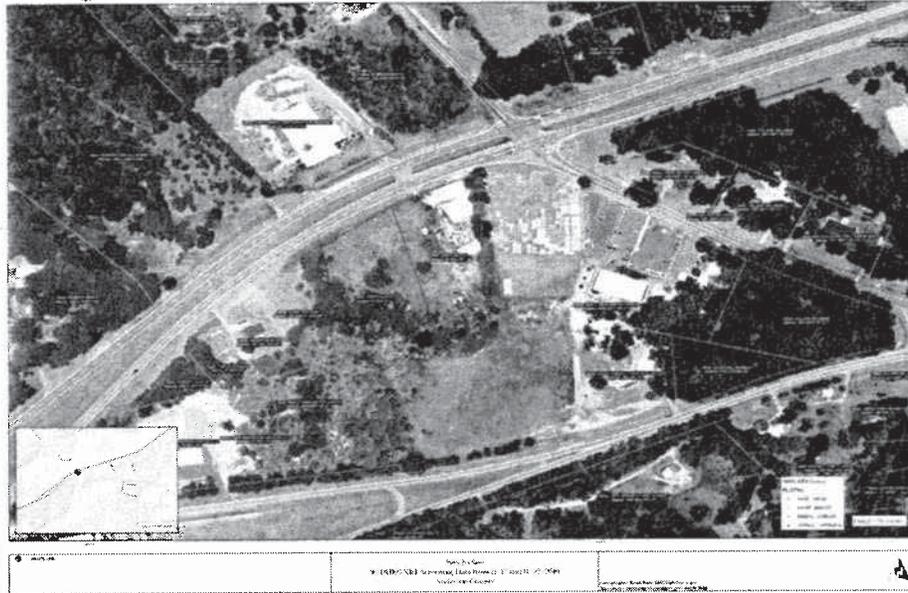
Total of 42 drums in this area – processed material



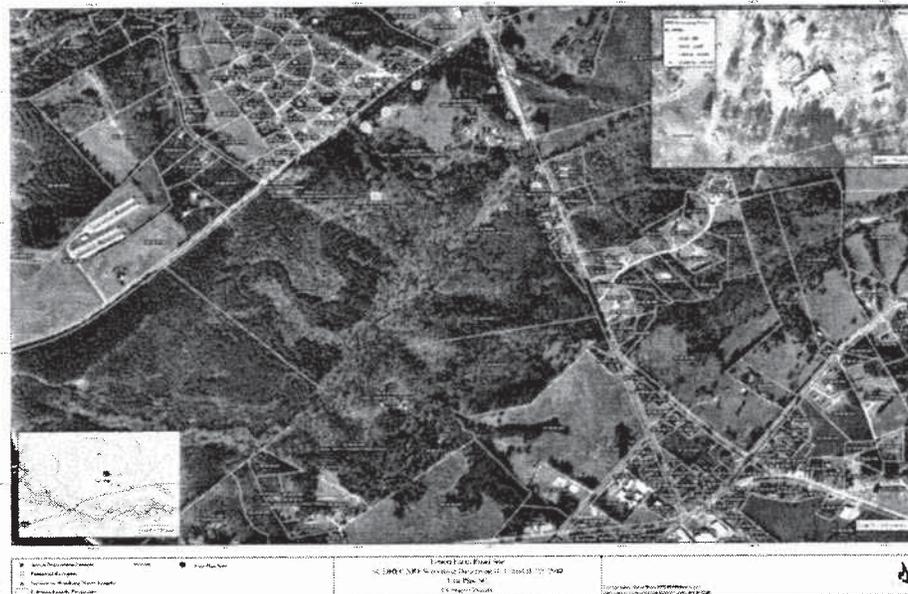
Attachment 2

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 11th 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 (ft²) 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 ft² 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,



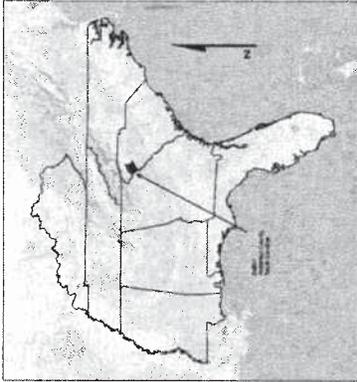
Jerry Partap
START Project Manager

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



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

FIGURE 1 TOPOGRAPHICAL MAP

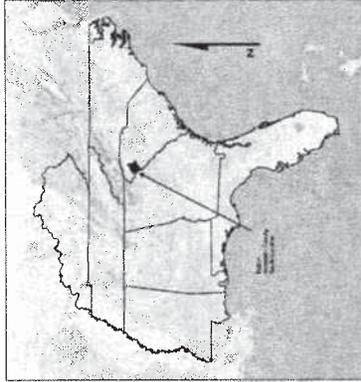


United States Environmental Protection Agency



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



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

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

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

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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

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 preceding 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, 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

and a copy to:

Paula V. Painter
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303
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, 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

and a copy to:

Paula V. Painter
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303
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(l) of CERCLA, 42 U.S.C. §§ 9606(b) and 9622(l), 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(l) 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 28th, 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 _____

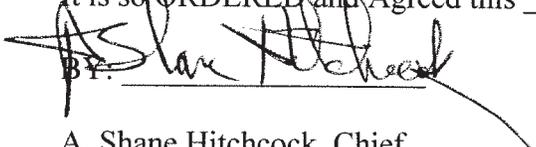
For Respondent, Gary Warehouse Services, LLC:

By C. Cummings Gary

Title President

IN THE MATTER OF THE WELCH GROUP ENVIRONMENTAL PALMETTO SITE:

It is so ORDERED and Agreed this 12th 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

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

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

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

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

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

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

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. In addition, the EPA Small Business Ombudsman may be contacted at 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.

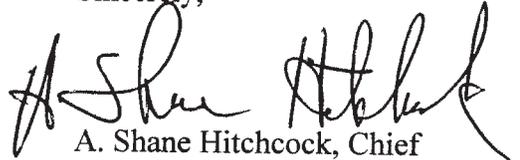
Response to this notice letter may be sent by email and should be sent to:

Bianca N. Jaikaran
Assistant Regional Counsel
U.S. Environmental Protection Agency
61 Forsyth Street, SW
Atlanta, Georgia 30303
jaikaran.bianca@epa.gov

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 a long horizontal stroke at the end.

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

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

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)

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 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

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)

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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

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

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 re-cleaned.
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)

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 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

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 suits, 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

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)

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Welch Group Environmental

118 White Oak Road

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864-462-0405

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 (oppose 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 ($\mu\text{g}/\text{ft}^2$)

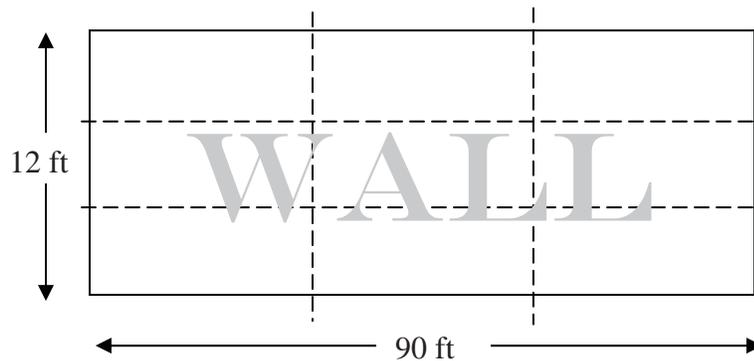
Window troughs: $400 \mu\text{g}/\text{ft}^2$

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...
 - ≤ 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

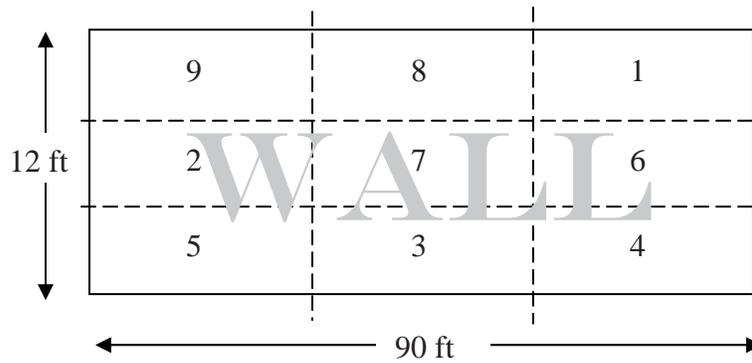
9	8	1
2	7	6
5	3	4

8	7	1
3	9	5
4	2	6

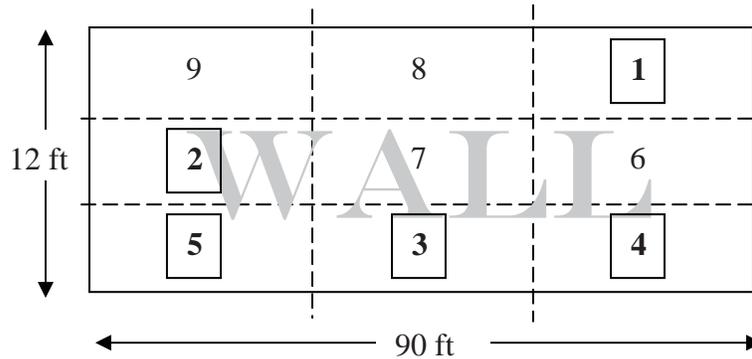
4	1	7
2	9	6
8	5	3

6	1	8
5	9	3
2	7	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

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**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 CAS Number	Max % w/ w	TWA (ACGIH) (ppm)	TLV (OSHA) (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

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 6: Accidental Release Measures

NA.

Section 7: Handling and Storage

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.

Section 9: Physical and Chemical Properties

Boiling Point:	NA
Vapor Pressure:	NA
Vapor Density (Air = 1):	NA
Specific Gravity (H ₂ O = 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

Section 10: Stability and Reactivity

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.

Section 11: Toxicological Information

This product has not been tested as a whole.

Section 12: Ecological Information

This product has not been tested as a whole.

Section 13: Disposal Consideration

Waste disposal method: According to all local, state and federal regulations.

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Milwaukee, WI 53212 U.S.A.
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Material Safety Data Sheet

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 14: Transport Information

This product is not regulated as a DOT hazardous material.

Section 15: Regulatory Information

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

Section 16: Other Information

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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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/m³ (inhalable) 8-hr TWA 3 mg/m³ (respirable) 6-hr TWA

OSHA PEL 15 mg/m³ (total dust) 8-hr TWA 5 mg/m³ (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: Na₃PO₄

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 24th, 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 14th, 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

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)

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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 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

118 White Oak Road

Belton, SC 29627

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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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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

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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

Belton, SC 29627

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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

Belton, SC 29627

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

118 White Oak Road

Belton, SC 29627

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

118 White Oak Road

Belton, SC 29627

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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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Welch Group Environmental

118 White Oak Road

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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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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

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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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Welch Group Environmental

118 White Oak Road

Belton, SC 29627

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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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Welch Group Environmental

118 White Oak Road

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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

118 White Oak Road

Belton, SC 29627

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WGE Belton, SC- PALMETTO Site

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

118 White Oak Road

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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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