



6 June 2008

Mr. Steve Spurlin
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
Ed Jones Federal Building
109 South Highland Avenue, B-13
Jackson, TN 38301

**Subject: Comprehensive Environmental Response, Compensation, and Liability Act
Site Assessment and Inspection Report
Liberty Fibers Site
Lowland, Hamblen County, Tennessee
EPA Contract No. EP-W-05-054
TDD No. TTEMI-05-003-0041**

Dear Mr. Spurlin:

The Tetra Tech EM Inc., Superfund Technical Assessment and Response Team (START) is submitting the site assessment and inspection report for the Liberty Fibers Site in Lowland, Hamblen County, Tennessee. This report summarizes field activities conducted at the site on 20 and 21 March 2008.

This letter report has been prepared under Technical Direction Document (TDD) No. TTEMI-05-003-0041, which the U.S. Environmental Protection Agency (EPA) Region 4 assigned to the Tetra Tech EM Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) under Contract No. EP-W-05-054. The overall scope of this TDD, monitored by EPA On-Scene Coordinator (OSC) Mr. Steve Spurlin of the Emergency Response and Removals Branch (ERRB), was to provide a Senior Scientist, equipment, supplies, and services necessary to conduct an assessment and inspection of a former rayon manufacturing facility that is being demolished in Lowland, Hamblen County, Tennessee. Specific elements of this TDD:

- ◆ Document site activities using logbooks (see Appendix A) and photographs (see Appendix B)
- ◆ Collect multimedia samples necessary to characterize site conditions
- ◆ Procure a laboratory for sample analysis
- ◆ Conduct air monitoring as directed or appropriate to ensure personnel safety
- ◆ Conduct field hazard categorization as necessary to characterize suspect hazardous materials
- ◆ Track costs and report to EPA via Form 1900-55
- ◆ Produce this report

This Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) assessment and inspection report discusses the site background, site activities and sampling, and conclusions. Appendix C contains a list of witnesses and contacts associated with the site. Figures depicting the site are included as Appendix D. A copy of the Full Data Validation Report prepared by Tetra Tech, including the results of sample analysis, is included as Attachment 1.

SITE BACKGROUND

Site background information was obtained from TDEC. Inserted below, in its entirety and without revision, is a TDEC briefing memorandum (*Liberty Fiber Update-Br. Chief.doc*) regarding the site that was forwarded to OSC Spurlin when ERRB was asked for assistance.

Name of the Site: Liberty Fibers
Current Owner: A&E Salvage Company
Address: PO Box 278, Lowland, TN 27778

Background Information:

On September 29, 2005, Liberty Fibers Corporation (the facility) filed for bankruptcy. The company is located in Lowland, Tennessee in Southern part of the Hamblen County. US Bankruptcy entered an order on October 11, 2006 approving the sell of salvage rights to J& N Salvage Company (now known as A&E Salvage Company) which includes any and all equipment and other personal properties at the Liberty Fiber Site. In addition to this A&E Salvage Company has option right to purchase the debtor's real property.

TDEC conducted a visit to the Liberty Fiber site on 9/18/06 in response to a tip alleging demolition activity at the site containing hazardous material on site and PCB Equipment and Items. The State coordinated their visit with the EPA Emergency Response Staff. During the site visit, TDEC observed approximately 24 transformers and 80 capacitors that were marked as PCBs or PCB contaminated units.

EPA received a copy of letter dated September 25, 2006 forwarded by TDEC from Hamblen County mayor to Commissioner of TDEC expressing concern regarding the environmental risk with PCBs and Asbestos and other chemicals present onsite at the Liberty Fibers site with the ongoing salvaging operation.

EPA contacted A&E Salvage Company, former Liberty Fibers representative and the court appointed trustee and TDEC on October 30, 2006, to verify the ownership of the property and requested copies of documents to sell salvage rights with option to purchase for the site and discussed PCB Electrical Equipment on site. During the discussion, A&E Salvage Company acknowledged that it was the owner of the PCB Equipment and that their company accepted full legal responsibility for it proper disposal in compliance with the PCB regulations. A&E Salvage Company expressed their willingness to cooperate with EPA and to secure the PCB Items on site including PCB transformers and capacitors for removal and proper disposal. However, requested EPA assistance to come in compliance with the TSCA-PCB regulations. EPA sent a letter dated November 14, 2006 to summarize the agreement reached during the call and to provide compliance assistance by high lighting the main requirements when handling, storing and disposing PCB Items. EPA requested A&E Salvage Company to provide a proposed plan for action in order to come in compliance with the PCB rules and regulations. EPA provided A&E Salvage Company requirements at a minimum that A&E Salvage Company would be required to provide as part of the proposed plan for removal and disposed of PCB Items and provided checklist for storage and disposal requirements for PCB and PCB contaminated Items.

EPA received the proposed plan dated January 8, 2007, from A&E Salvage Company stating that A&E Salvage Company had contracted with SD Myers to sample and test for PCBs for all the suspect transformers on site. A&E Salvage Company also mentioned as part of the plan to have signed a disposal contract with Booher Industrial Company based in Jasper, GA for removal and disposal of PCB Transformers.

As for the PCB units that are hot, A&E Salvage Company mentioned that they would have to wait until Morristown Utilities ran a new service so that existing PCB energized units could be de-energized and removed from service for disposal purposes.

EPA received sample results data from S.D. Myers on January 16, 2007. S.D. Myers appears to have sampled 39 transformers. The results from reviewing the analytical data confirmed the following:

No. of PCB Transformers = 4
No. of PCB contaminated units = 12
No. of Non PCB units = 23

The results of the review of the analytical data was shared with A&E Salvage company on January 17, 2007 requesting a follow-up meeting with A&E Salvage Company along with the TDEC to discuss the finding of analytical data in details, to discuss a timeline for disposal of PCB transformers in service and PCB Capacitors and to discuss the discrepancy in the number of transformers inventoried by the State and A&E Salvage Company.

EPA in the meantime, confirmed that Booher Industrial was not listed as EPA approved commercial storage and disposal facility to handle PCB regulated units. EPA informed A&E Salvage Company that Booher was not listed as a EPA approved commercial storer and disposer for handling PCB regulated waste.

It was in response to EPA confirmation for a meeting along with the State on January 30, 2007, EPA received a E-mail from A&E Salvage Company expressing concern for involving TDEC PCB program in the meeting stating the State Inspectors were rude and overbearing. EPA responded stating EPA and State were working as partners for providing compliance monitoring activity in the State and it would not be possible for EPA to abandon their State however, EPA would insure that such incidents were avoided and addressed through mentoring and training programs.

According to the most recent update received by A&E Salvage Company on March 28, 2007, a meeting was held last week of March with A&E Salvage Company, IPI Business and Morristown Utilities. The outcome of the meeting was that City of Morristown has included the old Liberty Fibers site as part of Urban Growth Boundaries and the City has decided to annex the area into the City of Morristown. As a result of annexation, the City would be responsible for providing utility services including power and water to Liberty Fiber Site. However, this still would have to go through the City/County Council voting process and would take at least end of summer before the City would be in a position to provide alternative power to the site.

Staff confirmed on March 29, 2007, the meeting mentioned by A&E Salvage Company with the Morristown Utilities.

Issues:

- Based on the inventory conducted by TDEC, A&E Salvage Company, there appears to be a discrepancy in the number of PCB Transformers, PCB Contaminated transformers that are energized as well as the ones that are de-energized and also PCB Capacitors and PCB Light Ballast.
- Based on the several E-mail correspondence with EPA and concerns expressed during tele-conferences by A&E Salvage Company to the extent of reporting the State Inspectors to the State representatives for being rude and overbearing, accessing the site for conducting any future inspection by the State could be an issue involving denial of entry or security and safety issue for the State Inspectors.
- According to A&E Salvage Company and confirmed by City of Morristown there is potential for other businesses adjoining to the Liberty Fiber Site owning PCB Equipment and Items.

Recommendation: The PCB Compliance Staff and the attorney with EAD recommend that EPA conduct an inspection at the site along with the State for the following reasons:

- EPA to have a field presence and to let the owner of the property be aware that EPA is serious about getting PCB equipment and items removed and disposed of promptly and properly.
- EPA to conduct a survey of the site to determine number of regulated PCB transformers that are in service as well as the ones that are regulated however de-energized and to require the owner to get the ones that are de-energized for prompt removal and disposal.
- EPA to conduct an inventory of the PCB capacitors on site and determine as to whether they are in service or not and require prompt removal and disposal.
- EPA to inspect the staging area to insure that it meets the regulatory storage for disposal requirements.
- EPA would use this site inspection visit as a onsite training for the State Inspectors.
- EPA to conduct site inspection at other adjacent business to determine PCB waste activity.
- EPA is of the opinion that the owner appears to be stalling and buying more time under the pretext that unless City of Morristown annexes the site and Morristown Utilities provides power, the A&E Salvage company may not be in a position to remove and dispose of any PCB Equipment since all the units are energized supplying power to Liberty Fibers plant.

In March 2008, the Resource Conservation and Recovery Act (RCRA) Division of the EPA RCRA and Oil Pollution Act (OPA) Enforcement and Compliance Branch contacted ERRB regarding conducting an assessment and inspection of the facility for a possible emergency removal action. OSC Spurlin contacted the EPA and TDEC representatives previously involved with the facility to discuss the site and review relevant documentation. OSC Spurlin, supported by START, as well as representatives from TDEC, EPA asbestos, EPA RCRA, and EPA Toxic Substances Control Act (TSCA) Enforcement programs coordinated a site visit for 20 and 21 March 2008.

The facility is now partially demolished with the debris fields remaining. Recycling and reclamation operations are ongoing and there is at least one metals recycling business operating onsite.

SITE ACTIVITIES AND SAMPLING

20 March 2008

OSC Spurlin and Tetra Tech START site manager Chris Draper arrived at the site at 1329 hours. TDEC and EPA personnel assembled outside in preparation for the site tour and inspection. Mr. Mark Sawyer, a local investor in A&E Salvage (A&E) and Mr. Tom Montgomery, a former employee of Liberty Fibers Corporation, conducted the tour. Table 1 contains a list of the known and suspected hazardous materials discovered.

**TABLE 1
KNOWN OR SUSPECTED HAZARDOUS MATERIALS**

Material Description	Location	Sampled (Yes or No)	Photo # (if applicable)
Leaking 55-gallon drum labeled "Used Oil"	Along the road on the northern side of site	No	3
Vault containing six approximately 10,000-gallon tanks used to store carbon disulfide. The tanks are normally kept under water to preclude fire and explosion. The vault is leaking through a crack in the western wall, compromising the water blanket	Northwestern corner of property	Yes	5, 6, 28
Approximately 50,000-gallon sulfuric acid tank purported to still contain 8-inches of product	Central portion of site	No	7
White crystalline solid, that, according to Mr. Montgomery, was most likely sodium sulfate, on the ground near the vertical sulfuric acid tank	Central portion of site. Near sulfuric acid tank	No	8
Approximately 300-gallon tank, oil / water separator, and drums of used oil	Used oil storage area with oil-stained secondary containment and standing run-on water	No	9, 10, 11
Two 55-gallon drums labeled "BETCO Liquid Chisel" with sodium metasilicate	South of used oil storage area	No	12, 13
Building partially full of bags marked "asbestos-containing material"	Building south of used oil storage area	No	14, 15, 16, 17
Various laboratory quantity containers of chemicals that have been segregated pending disposal	Within locked, fenced area with PCB storage building	No	19
Known and suspected PCB contaminated articles and oils	PCB storage building within an area of secondary containment lined with plastic sheeting and sawdust	Yes	20, 21, 36, 37, 38, 39
Known and suspected PCB contaminated articles and oils	PCB storage building, but not within secondary containment	Yes	22, 35
Oily material on floor	Paint shop	No	23
Drums and smaller containers of various hazardous and non-hazardous substances. The items appear to have been placed in lots in an attempt to sell them	Within a building used for general storage north of the metal recycling operation	No	24
Oily material and absorbent on floor	Within a building used for general storage north of the metal recycling operation	No	25
Soil and surface water possibly contaminated with PCBs from transformers removed from service. Soil has been excavated and was stored onsite in a rolloff container outside of the PCB storage building at the time of the site visit	Central portion of site. Where transformers were discovered on ground by TDEC during a previous visit	Yes	26, 27, 29, 30, 31
Suspected asbestos-containing material	Along the road on the northern side of site	Yes	32, 33

Mr. Sawyer stated that demolition activities were approximately ninety percent complete, but the remaining debris must still be sifted for recyclables. Mr. Montgomery described Liberty Fibers former operations, waste management practices, and information regarding any remaining hazardous materials

Mr. Montgomery pointed-out and described the concrete vault that contains six tanks of approximately 10,000-gallons that were used to contain carbon disulfide, an extremely flammable chemical used in the manufacturing of rayon. The vault is typically filled with water to cover the tanks in order to reduce the possibility of fire and explosion. Mr. Montgomery identified a leak in the western wall of the vault that has resulted in the tanks being only one-half under water and possibly impacting the surrounding soil. OSC Spurlin indicated that a sample of the soil directly below the crack in the vault wall should be collected and analyzed for volatile organic compounds, specifically carbon disulfide. Table 2 summarizes all of the samples collected and the analytical results.

TABLE 2
SAMPLE COLLECTION AND DATA SUMMARY

Sample ID	Type	Matrix	Analyses	Location Description	Result
LF-SS-01	Grab	Soil	VOCs (carbon disulfide)	Directly below leak in western wall of carbon disulfide tank vault	0.927 mg/kg (carbon disulfide)
LF-SW-01	Grab	Surface Water	PCBs	Surface water in ditch where two transformers were discovered on the ground by TDEC during an earlier visit	2480 µg/L (Arochlor 1260)
LF-SS-02	Composite	Soil	PCBs	Soil near water in ditch where two transformers were discovered on the ground by TDEC during an earlier visit	0.362 mg/kg (Arochlor 1260)
LF-ACM-01	Grab	Solid	Asbestos	Suspected ACM discovered along road on northern end of site, in a debris pile near an old railroad fill rack	ND
LF-PW-01	Grab	Wipe	PCBs	Non-permitted PCB storage area; on floor outside of secondary containment	ND
LF-PW-02	Grab	Wipe	PCBs	Non-permitted PCB storage area; on side of leaking capacitor outside of secondary containment	ND
LF-PL-01	Grab	Liquid	PCBs	Non-permitted PCB storage area; 250-gallon tote tank of suspected PCB oil within secondary containment	ND
LF-PW-03	Grab	Wipe	PCBs	Non-permitted PCB storage area; on side of leaking capacitor within secondary containment	ND
LF-PS-01	Grab	Solid	PCBs	Non-permitted PCB storage area; oil-soaked sawdust under transformer with serial number 7024835 within secondary containment	380 mg/kg (Arochlor 1260)

Notes:

LF = Liberty Fiber, Lowland, TN
ACM = asbestos-containing material
PCB = polychlorinated biphenyls
VOC = volatile organic compounds

µg/L = micrograms per liter
mg/kg = milligrams per kilogram
ND = not detected

Following the tour, representatives from EPA and TDEC split-up and investigated various portions of the facility independently to focus on their respective areas of expertise. At OSC Spurlin's request, Mr. Sawyer showed OSC Spurlin and Tetra Tech START site manager Draper the area where Ms. Adrienne White of the TDEC Toxic Substances Program had discovered transformers on the ground, near a drainage ditch during a previous visit. After discovery by TDEC, A&E removed the transformers and had the area excavated and sampled by a contractor. The excavated soil was being stored within a roll-off container staged outside on the non-permitted PCB storage building during this visit. Although, A&E had previously intimated that the transformers had been illegally dumped onsite, Mr. Sawyer stated that he believed that they were from the facility.

TDEC and EPA TSCA representatives have been attempting to ascertain the whereabouts of or verify disposal methods for several PCB transformers known to have been in service at the site. Mr. Raj Aiyar of the EPA PCB and Chemical Product Section and Ms. White of TDEC stated that there are approximately six or seven transformers unaccounted for. Additionally, the remaining PCB items stored at the site may not be stored in compliance with all applicable regulations.

All EPA, TDEC and START personnel demobilized from the site at 1752 hours.

21 March 2008

OSC Spurlin and Tetra Tech START site manager Draper arrived onsite at 0800 hours. OSC Spurlin tasked START to collect the samples identified in Table 2. The samples were collected, documented, and delivered to Test America Laboratories, Inc. in Nashville, Tennessee for analysis. While START collected samples, EPA and TDEC representatives provided A&E with an overview of their findings. OSC Spurlin and Tetra Tech START site manager Draper demobilized from the site at 1231 hours.

CONCLUSION

Based on current site conditions, OSC Spurlin determined an emergency removal action was not warranted. However, a number of compliance issues involving multiple TDEC and EPA regulatory programs were identified. EPA is currently negotiating with A&E to address ongoing compliance issues, including:

- ◆ Site security and access;
- ◆ PCB item disposition and management;
- ◆ the carbon disulfide tanks and vault;
- ◆ the sulfuric acid tank;
- ◆ characterization and management of drums scattered throughout the site;
- ◆ asbestos;
- ◆ used oil management;
- ◆ and stormwater and chemical sewer issues.

As of the date of this report, A&E Salvage, Inc. has expressed a willingness to hire qualified contractors to address EPA and TDEC concerns. If A&E is unwilling or unable to undertake the necessary actions, ERRB may reevaluate site conditions and the need for an emergency or time-critical removal action.

If you have any questions or need additional copies of this report, please contact me (Sandra Harrigan) at (678) 775-3088 or Andrew Johnson at (678) 775-3100.

Sincerely,

Sandra Harrigan
START III Project Manager

Andrew F. Johnson
START III Program Manager

Attachment

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

APPENDIX A

LOGBOOK NOTES
(Six Pages)

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LIBERTY FIBERS
ITEM I - 05 - 003 - 0041

03/20/08

1329 ARRIVE @ LIBERTY FIBER

MANY FOLKS OF VARYING AGENCIES
ON TOUR

1344 HEAR THAT CARBON DISULFIDE MAY HAVE
LEAKED

MR. MONTGOMERY DESCRIBES WASTE MGT.
AND DISPOSAL TO OSC SPURLIN.

TRACE SULFURIC ACID < 8" BELOW VALVE
IN 40-50K GALLON TANK

1353 JOLLY ROCK LIES DUE SOUTH - MAY GO
SEE THEM

1351 MR. SAWYER STATES A:E IS 90% DONE.
DEBRIS REMAINS TO SORT FOR RECYCLABLES

1404 OSC SPURLIN INSTRUCTS A:E TO CLEAN-UP
USED OIL SPILLED ON NORTH END (PKG 3)

1408 STILL PROCESSING STORM: GW FOS \$5500/MG
IF A:E BUYS IT, THEY MUST PAY

CONTRACT TO PURCHASE EXPIRES IN OCT. 2008
PHASE I: II IN 1992 (A PORTION)

1481 CS₂ TANK VAULT W/ 6 EACH ~10000 GAL
TANKS, MAY LEAK ON W. SIDE, POSSIBLY
IMPACTING SOIL
CS₂ IS POOR, ACUTELY HAZ. WASTE

1438 Na₂SO₄ ON GROUND E. OF H₂SO₄ TANK

1455 FIND ROLL-OFF OF EMPTY DRUMS FROM
POWERHOUSE

1506 DAVID ABBOTT, ^{EPA}MULTIMEDIA ENFORCEMENT,
RAJ ~45 TRANS
16 COM.

CAN FIND 6, 7 TRANS. MISSING

4 EA 250-GAL TOTES

1 LEAKING TRANSFORMING

ALSO HOLDS LABPACKS

1512 MR. SAWYER HISTORIC H₂ NEAR OLD TANK
PAYS WEST OF POWERPLANT, NEAR ROUND
FILAMENT

1547 AT PCB STORAGE. ACCORDING TO ERIC
GRUENBERG, 3 TRANS IN / DITCH.
THEN SAMPLED (A:E) DITCH.
WILL SAMPLE AS NEEDED

BRAD PIERCE w/ SAFETY KLEEN
GEO?

1638 GENERAL STORAGE HAS SOME DRUMS
AND SMALL CONTAINERS THAT APPEAR TO
HAVE BEEN PLACED IN LOTS FOR SALE.

1647 RIDE W/ MR. SAWYER ? OSC SPURLIN
TO SEE WHERE DOWNED, LEAKING
TRANSFORMERS WERE FOUND

1650 VIEW SITE. DITCH IS ONSITE AND
HAS BEEN EXCAVATED AND SOIL/DEBRIS
IS STAGED ONSITE BY PCB BLDG. BY
SMETV KLEEN

1655 RAY AND MR. SAWYER DISCUSS AND
MR. SAWYER SAYS THEY ARE A/E'S TO
ACCEPT BLAME.

1716 USED MARION ENV : ESC LAB TO ANALYZE
PCBS. SAW COC BUT NO DATA

1752 OPS / ASSESSMENT COMPLETE. SHOULD RETURN
@ 08:00 ON 21 MARCH

Chris

03/21/05

03/21/05

0800 ARRIVE ONSITE

- OSC SPURLIN
- START DEAPER
- RCRA LAMBERT
- RCRA HECTOR
- DAVID ABBOTT
- TSCA RAS
- TDEC ADRIAN WHITE

0834 PREPARE TO COLLECT

- ~~• 1 LIQUID, SW SAMPLE NEAR CS₂~~
- ~~• TARGET FOR VOLTS ^{PP} NET~~
- ~~• 1 L AND 3 VOA COLLECTED~~

- 1 SOLID, SOIL SAMPLE NEAR CS₂
- 1 EA 8 OZ ^{PP} 2 EA 2 OZ

VOLS LIQ 3 VOAS
TRIP BLACK

PCB 1 8 OZ
VOLS SOIL 2 EA ~~8 OZ~~ SPECIFY CS₂
VOLS LIQ ^{PP} 2
PCB LIQ 2 EA 1 L AMBER

John

0906 COLLECT LF-SS-01
 2 EA 20Z JARS FOR VOAs
 — SPECIFICALLY CS₂
 36.15756° N / 83.21056° W
 LEAKING CRACK IN Nth WEST WALL OF
 CS₂ VAULT
 DID NOT COLLECT SURFACE H₂O SAMPLE
 AT THIS LOCATION

0937 MOVE TO SITE WHERE 2 PCB
 TRANSFORMERS WERE DISCOVERED
 36.15662° N / 83.20918° W

0952 2 EA 1-L AMBER
 LF-SW-01

1022 COLLECT PCB SOIL SAMPLE FROM
 EXCAVATED AREA AND DITCH WHERE
 TRANSFORMERS WERE FOUND

1031 LF-SS-02

1049 COLLECT SAMPLE OF SUSPECT ACM FROM
 DEBRIS PILE NEAR RAILROAD FILL RACK
 ON N. SIDE OF SITE
 1 EA 2 OZ JAR
 LF-ACM-01

MATERIAL WAS NOT MET

1103 MOVE TO PCB STORAGE AREA TO
 COLLECT WIPE SAMPLE

1117 COLLECT LF-PW-01
 FROM FLOOR OUTSIDE OF
 SECONDARY CONTAINMENT IN PCB
 STORAGE AREA
 1 EA PCB WIPE

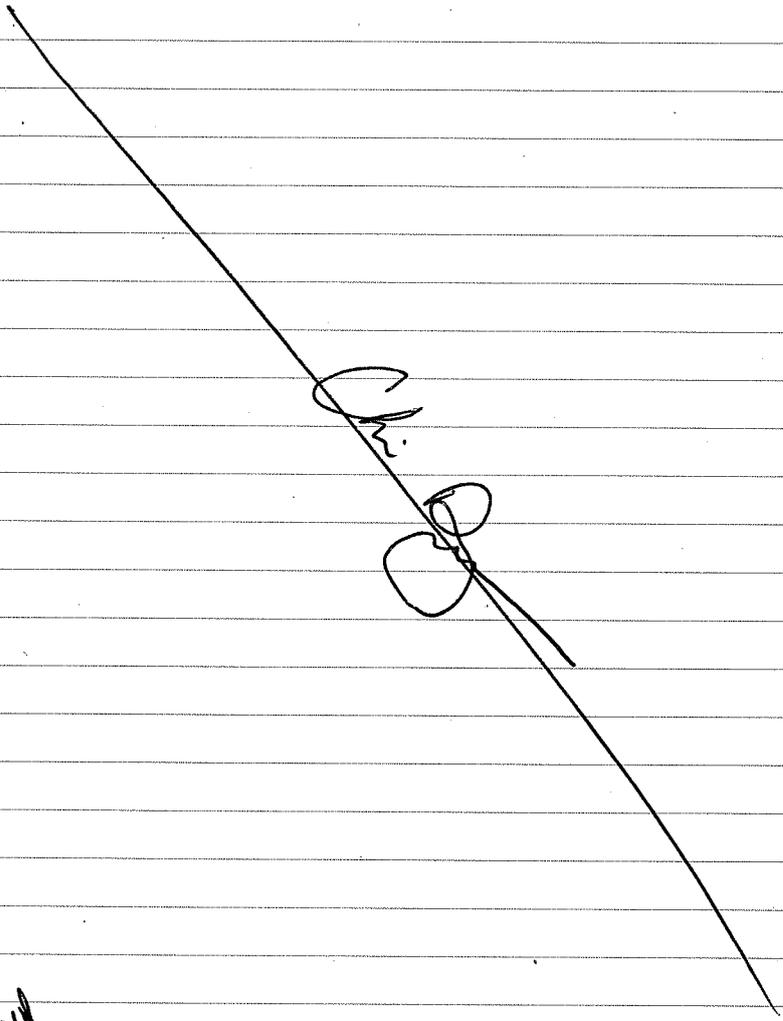
1124 COLLECT LF-PW-02
 FROM SIDE OF LEAKING CAPACITOR
 OUTSIDE OF CONTAINMENT WITH
 SANDUST AS ABSORBENT OF FLOOR

1131 COLLECT PCB OIL SAMPLE FROM (1 EA 8oz)
 250-GAL TOTE WITHIN CONTAINMENT

1138 COLLECT LF-PW-03 FROM SIDE OF
 LEAKING CAPACITOR WITHIN SECONDARY
 CONTAINMENT

1153 COLLECT SOLID SANDUST SAMPLE
 OF SUSPECTED PCB OIL LEAK UNDER
 TRANSFORMER S/N: 7024835
~~LF-SS-03~~ 1 EA 8oz JAR
 LF-PS-01

1231 SAMPLING COMPLETE
A: E DEBRIEFED BY EPA
ALL OFF-SITE



[Handwritten signature]

APPENDIX B

PHOTOGRAPHIC LOG
(39 Pages)



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

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: East **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Entrance to Lowland Metals Processing Facility, formerly Liberty Fibers (site).



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

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: South **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Typical debris field present at the site due to demolition and metals reclamation.



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

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: North

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Leaking drum of labeled "Used Oil" discovered along the road on the northern side of the site.



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

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: South **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Basin formerly used to neutralize caustic soda (calcium hydroxide) using sulfuric acid.



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

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: Northeast

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Vault containing six approximately 10,000-gallon tanks used to store carbon disulfide. The tanks are normally kept under water to preclude fire and explosion. The vault is leaking through a crack in the western wall, thus compromising the water blanket.



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

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: West **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Area immediately below the crack in the western wall of the carbon disulfide vault.



**OFFICIAL PHOTOGRAPH NO. 7
U.S. ENVIRONMENTAL PROTECTION AGENCY**

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: East **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Approximately 50,000-gallon sulfuric acid tank purported to still contain approximately 8-inches of product.



OFFICIAL PHOTOGRAPH NO. 8
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: East **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Purported sodium sulfate on the ground east of the approximately 50,000-gallon sulfuric acid tank.



OFFICIAL PHOTOGRAPH NO. 9
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: South

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Drums labeled as "Used Oil" within an oil-stained area of secondary containment holding a substantial amount of run on water.



OFFICIAL PHOTOGRAPH NO. 10
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: East **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Drums and an approximately 3,000-gallon tank labeled as "Used Oil" within an oil-stained area of secondary containment.



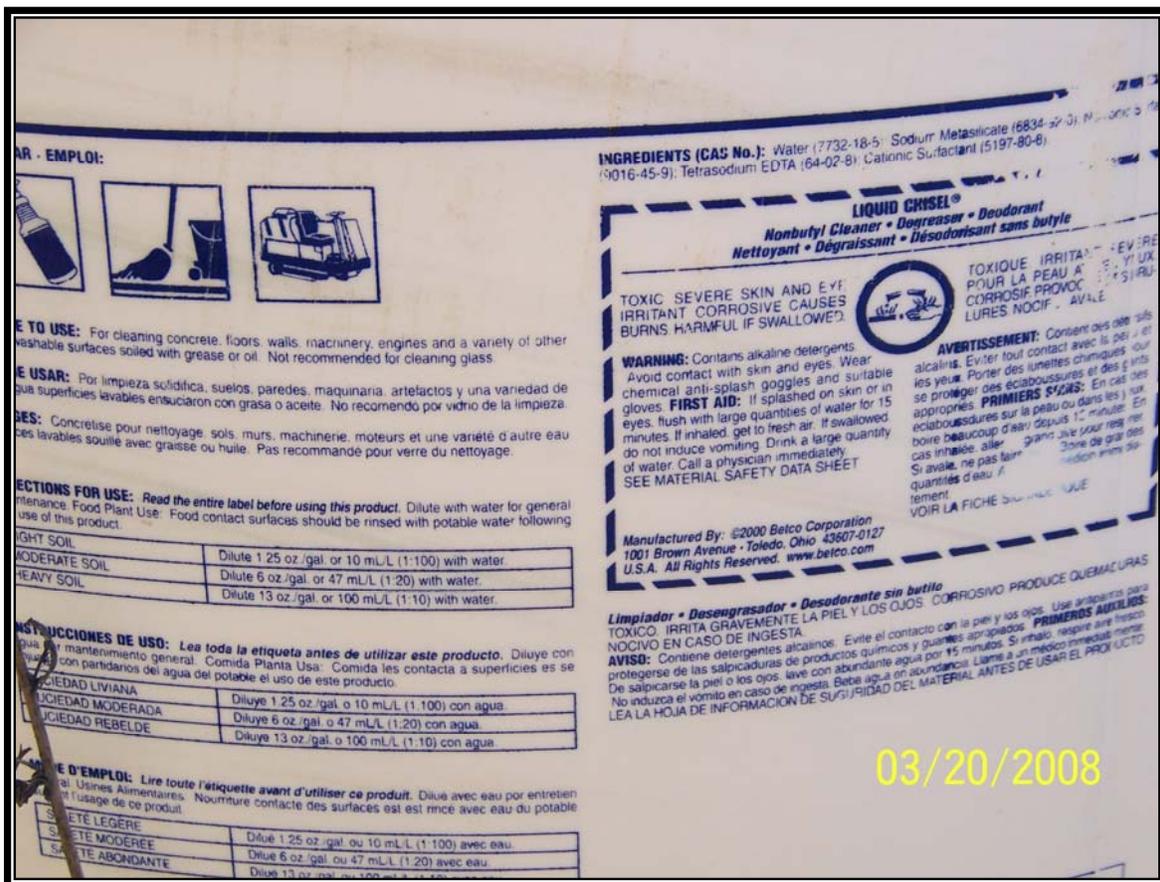
OFFICIAL PHOTOGRAPH NO. 11
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: North **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Oil-water separator within an oil-stained area of secondary containment.



**OFFICIAL PHOTOGRAPH NO. 12
U.S. ENVIRONMENTAL PROTECTION AGENCY**

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: South **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Drum labeled as "BETCO Liquid Chisel" identifying sodium metasilicate as the primary ingredient.



OFFICIAL PHOTOGRAPH NO. 13
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site

Orientation: South **Date:** March 20, 2008

Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA

Subject: Label of drum labeled as "BETCO Liquid Chisel" identifying sodium metasilicate as the primary ingredient.



OFFICIAL PHOTOGRAPH NO. 14
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: East **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: View through window of building used to store asbestos containing materials removed from various locations throughout the site pending disposal.



OFFICIAL PHOTOGRAPH NO. 15
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site

Orientation: South **Date:** March 20, 2008

Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA

Subject: Signage on door to building used to store asbestos containing materials removed from various locations throughout the site pending disposal.



**OFFICIAL PHOTOGRAPH NO. 16
U.S. ENVIRONMENTAL PROTECTION AGENCY**

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: East

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: View immediately right as you enter the door to building used to store asbestos containing materials removed from various locations throughout the site pending disposal.



OFFICIAL PHOTOGRAPH NO. 17
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: West

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

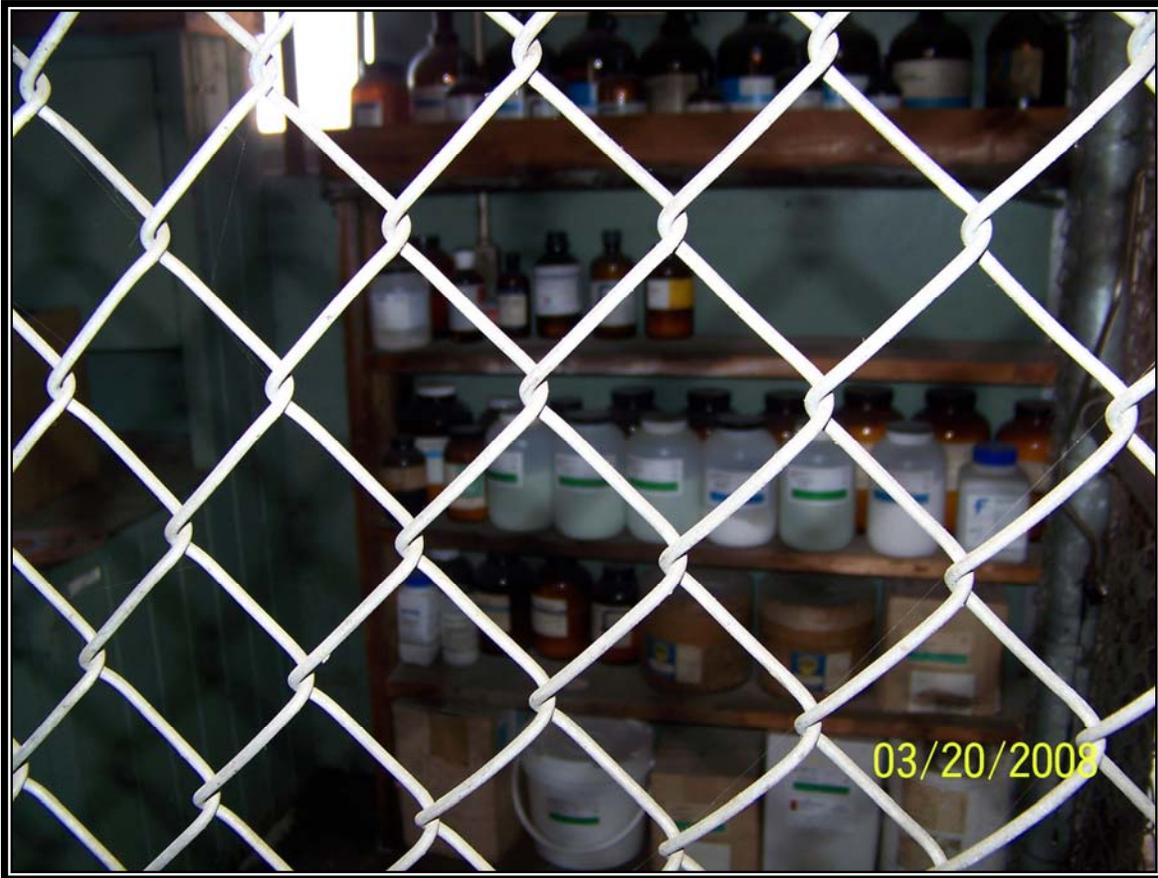
Witness: OSC Steve Spurlin, EPA

Subject: View immediately left as you enter the door to building used to store asbestos containing materials removed from various locations throughout the site pending disposal.



**OFFICIAL PHOTOGRAPH NO. 18
U.S. ENVIRONMENTAL PROTECTION AGENCY**

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: West **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Signage on door to non-permitted building used to store known and suspected polychlorinated biphenyl (PCB) containing materials and equipment removed from various locations throughout the site pending disposal.



OFFICIAL PHOTOGRAPH NO. 19
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: East **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Various laboratory quantity containers of chemicals that have been segregated pending disposal.



**OFFICIAL PHOTOGRAPH NO. 20
U.S. ENVIRONMENTAL PROTECTION AGENCY**

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: East

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Known and suspected PCB contaminated articles stored within a non-permitted area of secondary containment lined with plastic sheeting and sawdust.



**OFFICIAL PHOTOGRAPH NO. 21
U.S. ENVIRONMENTAL PROTECTION AGENCY**

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: North

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Known and suspected PCB contaminated articles and oils stored within a non-permitted area of secondary containment lined with plastic sheeting and sawdust.



OFFICIAL PHOTOGRAPH NO. 22
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: South

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Oil on floor outside of secondary containment and possibly leaking from a 250-gallon tote that purportedly contains non-PCB oil.



OFFICIAL PHOTOGRAPH NO. 23
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: West

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Oil on floor in paint shop.



**OFFICIAL PHOTOGRAPH NO. 24
U.S. ENVIRONMENTAL PROTECTION AGENCY**

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: North

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Drums and smaller containers of various hazardous and non-hazardous materials and substances discovered within a building used for general storage. The items appear to have been placed in lots in an attempt to sell them.



OFFICIAL PHOTOGRAPH NO. 25
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: East **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Oil and absorbent on the floor within a building used for general storage.



OFFICIAL PHOTOGRAPH NO. 26
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: South

Date: March 20, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Area where transformers were discovered on the ground by TDEC during a previous visit. The soil has been excavated and was stored onsite in a rolloff container at the time of this photograph.



OFFICIAL PHOTOGRAPH NO. 27
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: Southwest **Date:** March 20, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Straw bale dam in ditch immediately downgradient from area where transformers were discovered on the ground by TDEC officials during a previous visit.



OFFICIAL PHOTOGRAPH NO. 28
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: East **Date:** March 21, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Ground below the crack in western wall of the carbon disulfide vault where sample LF-SS-01 was collected.



OFFICIAL PHOTOGRAPH NO. 29
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: North

Date: March 21, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Surface water with oil sheen in ditch immediately downgradient from the area where transformers were discovered on the ground by TDEC officials during a previous visit. Sample LF-SW-01 was collected from this location.



OFFICIAL PHOTOGRAPH NO. 30
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: West

Date: March 21, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Soil immediately downgradient from area where transformers were discovered on the ground by TDEC officials during a previous visit. Composite soil sample LF-SS-02 was collected from this location.



OFFICIAL PHOTOGRAPH NO. 31
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: West

Date: March 21, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Soil immediately downgradient from area where transformers were discovered on the ground by TDEC officials during a previous visit. Composite soil sample LF-SS-02 was collected from this location.



OFFICIAL PHOTOGRAPH NO. 32
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: North

Date: March 21, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Suspected asbestos-containing material comprising sample LF-ACM-01, which was collected near the road by the railroad tracks on the northern portion of the site.



OFFICIAL PHOTOGRAPH NO. 33
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: Northeast **Date:** March 21, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Prospective view of sample LF-ACM-01 collection site.



OFFICIAL PHOTOGRAPH NO. 34
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: South

Date: March 21, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Location where PCB wipe sample LF-PW-01 was collected from the floor immediately inside the door, outside of secondary containment within the non-permitted building used to store known and suspected PCB-containing materials and equipment removed from various locations throughout the site pending disposal.



OFFICIAL PHOTOGRAPH NO. 35
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: South **Date:** March 21, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Location where PCB wipe sample LF-PW-02 was collected from oil staining on the side of a capacitor located outside of secondary containment.



OFFICIAL PHOTOGRAPH NO. 36
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

Orientation: North

Date: March 21, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Location where sample LF-PL-01 was collected from 250-gallon tote of oil within secondary containment.



OFFICIAL PHOTOGRAPH NO. 37
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site
Orientation: South **Date:** March 21, 2008
Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA
Subject: Location where PCB wipe sample LF-PW-03 was collected from oil staining on the side of a capacitor located within secondary containment.



OFFICIAL PHOTOGRAPH NO. 38
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0041

Location: Liberty Fibers Site

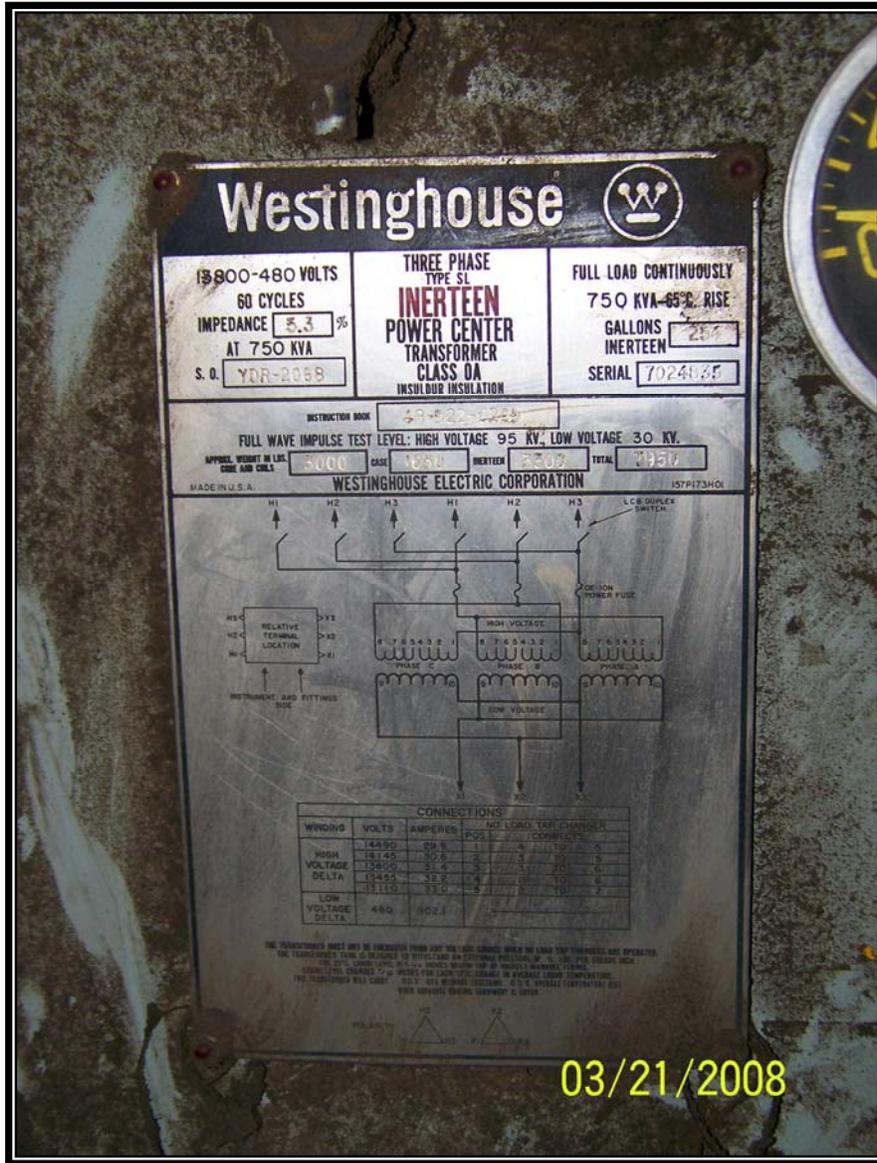
Orientation: North

Date: March 21, 2008

Photographer: Chris Draper, Tetra Tech

Witness: OSC Steve Spurlin, EPA

Subject: Oil-stained sawdust within secondary containment and immediately below a transformer with serial number 7024835 where sample LF-PS-01 was collected.



**OFFICIAL PHOTOGRAPH NO. 39
U.S. ENVIRONMENTAL PROTECTION AGENCY**

TDD Number: TTEMI-05-003-0041 **Location:** Liberty Fibers Site

Orientation: North **Date:** March 21, 2008

Photographer: Chris Draper, Tetra Tech **Witness:** OSC Steve Spurlin, EPA

Subject: Name plate of transformer with serial number 7024835 which is believed to have leaked within secondary containment.

APPENDIX C

**TABLE OF WITNESSES
(1 Page)**

**TABLE OF WITNESSES
LIBERTY FIBERS SITE
LOWLAND, HAMBLEN COUNTY, TENNESSEE**

Mr. Steve Spurlin
Emergency Response and Removals Branch
Federal On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
Ed Jones Federal Building
109 S. Highland Avenue, B-13
Jackson, TN 38301
Telephone No.: (731) 394-8996

Mr. Chris Draper
Superfund Technical Assessment and Response Team
Site Manager
Tetra Tech EM Inc.
712 Melrose Avenue
Nashville, TN 37211
Telephone No.: (615) 969-1334

Mr. Larry Lamberth
RCRA and OPA Enforcement and Compliance Branch
RCRA Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303
Telephone No.: (404) 562-8590

Mr. Raj Aiyar
Toxic Substances Section
Enforcement and Compliance Officer
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960
Telephone No.: (404) 562-8993

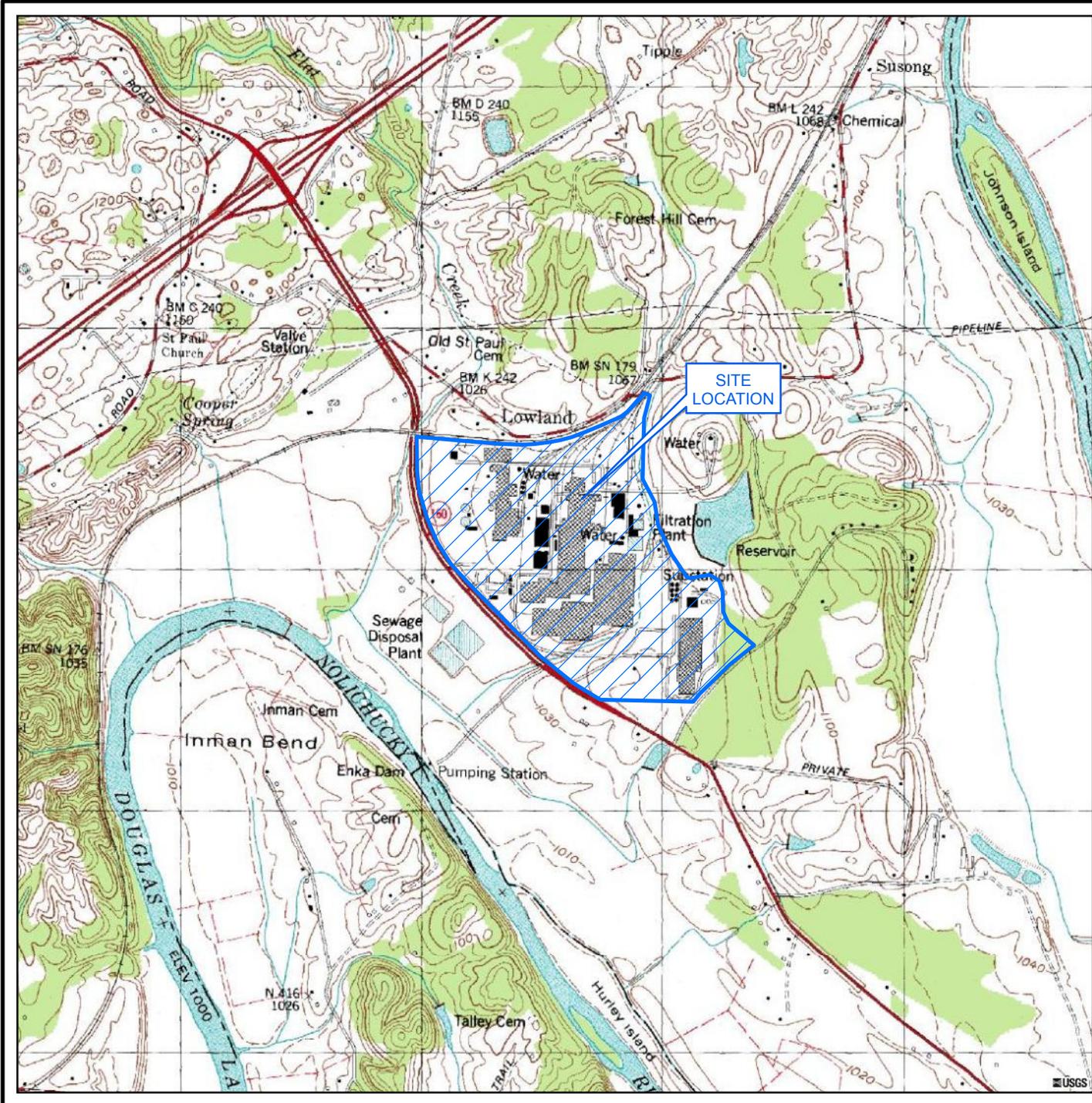
Ms. Adrienne White
Toxic Substances Program
Division of Solid and Hazardous Waste
Tennessee Department of Environment and Conservation
401 Church Street
L&C Towers, 5th Floor
Nashville, TN 37243
Telephone No.: (615) 532-0885

Mr. Mark Sawyer
Director
A&E Salvage, Inc.
4901 Enka Highway
Lowland, TN 37778
Telephone No.: (423) 586-5528



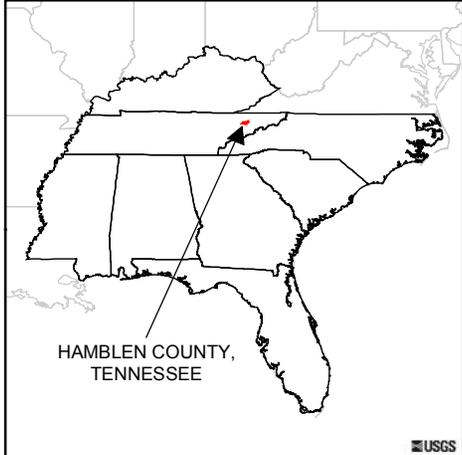
APPENDIX D

SITE FIGURES
(Two Pages)




 0 1,000 2,000 Feet
 1:24,000

MAP SOURCE:
 USGS, SPRINGVALE, TENNESSEE
 TOPOGRAPHIC QUADRANGLE, 1981

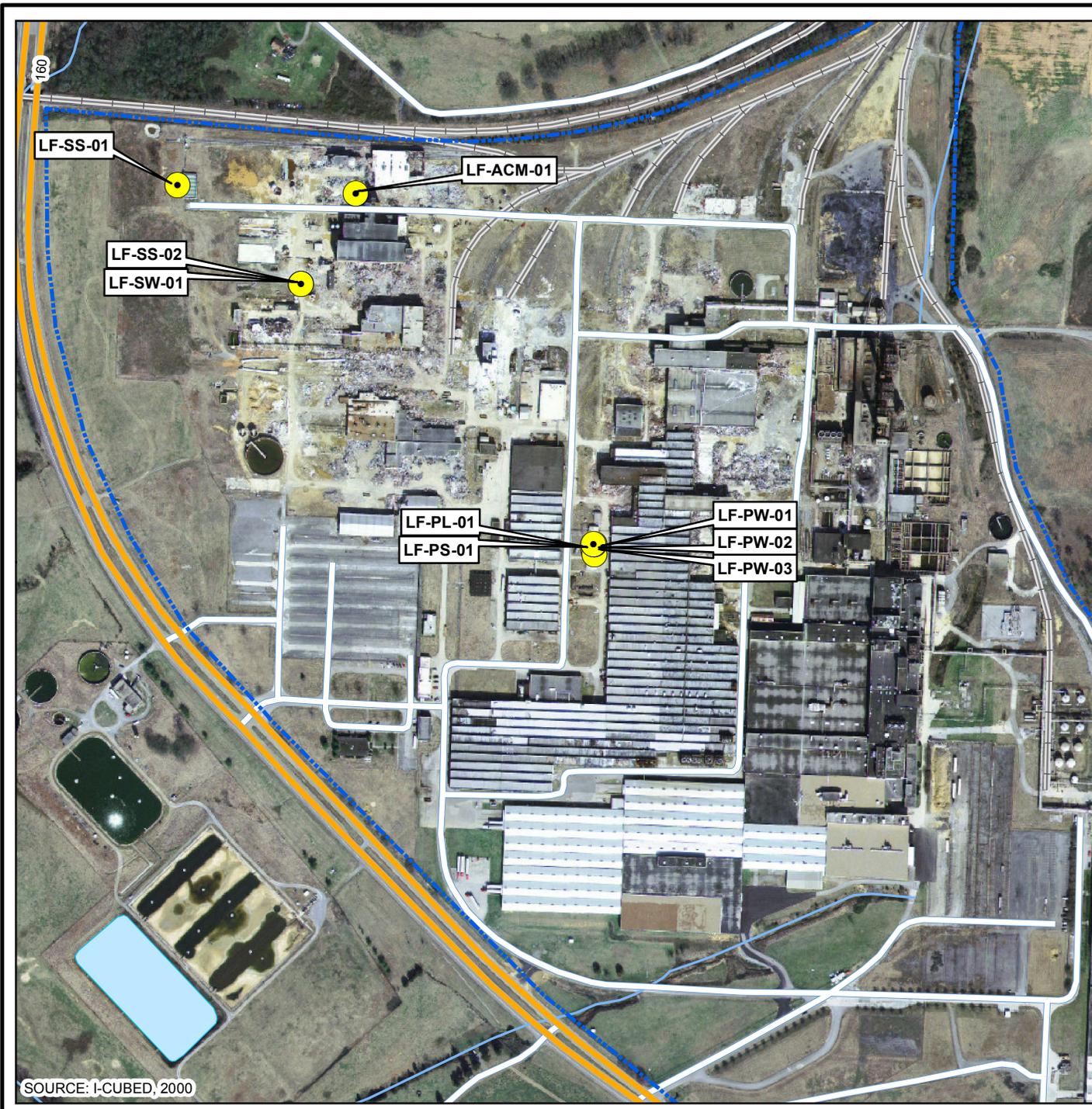



 United States Environmental Protection Agency

LIBERTY FIBER
 LOWLAND,
 HAMBLEN COUNTY,
 TENNESSEE
 TDD No. TTEMI-05-003-0041

FIGURE 1
SITE LOCATION

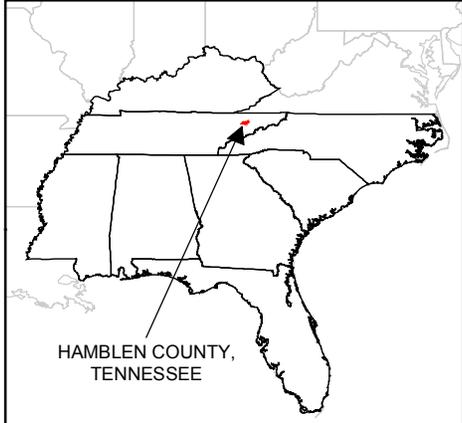
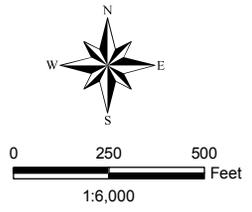




SOURCE: I-CUBED, 2000

LEGEND

-  Sampling Locations
-  Approximate Site Boundary



 United States Environmental Protection Agency

LIBERTY FIBER
 LOWLAND,
 HAMBLEN COUNTY,
 TENNESSEE
 TDD No. TTEMI-05-003-0041

FIGURE 2
SITE LAYOUT AND
SAMPLING LOCATIONS

 **TETRA TECH**

ATTACHMENT 1

**TETRA TECH FULL DATA VALIDATION REPORT
(XXX Pages)**