TETRA TECH

January 18, 2011

Mr. Perry Gaughan
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW, 11th Floor
Atlanta, Georgia 30303

Subject: Final Site Reconnaissance Letter Report
Liberty Fibers Site
Lowland, Hamblen County, Tennessee
EPA Contract No. EP-W-05-054
TDD No. TTEMI-05-003-0041

Dear Mr. Gaughan:

The Tetra Tech EM Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) is submitting the final site reconnaissance letter report for the Liberty Fibers Site in Lowland, Hamblen County, Tennessee. This report summarizes field activities at the site on December 3 and 4, 2009. Tetra Tech was tasked to provide a senior scientist, equipment, supplies, and services necessary to conduct a site reconnaissance at the former rayon manufacturing facility that is being demolished; provide written and photographic documentation of reconnaissance activities; and prepare a draft and final reports.

This letter report for the December 2009 site reconnaissance includes four appendices. Appendix A provides figures illustrating the site location and site layout. Appendix B provides a copy of the Tetra Tech START logbook notes. Appendix C provides a photographic log of the reconnaissance activities. Appendix D provides a table of witnesses and contacts associated with the site.

SITE BACKGROUND

The Liberty Fibers site is a former rayon fiber manufacturer located at 4901 Anka Highway (County Highway 160) in Lowland, Hamblen County, Tennessee (see Figure 1 in Appendix A). According to a briefing memorandum prepared by the Tennessee Department of Environment and Conservation (TDEC), Liberty Fibers filed for bankruptcy in September 2005. A&E Salvage Company (formerly J&N Salvage Company) bought the salvage rights to the Liberty Fibers property in October 2006. The salvage rights include any and all equipment and materials located on the property and the option to purchase the property.

In September 2006, TDEC, in coordination with EPA, conducted a site visit in response to a tip TDEC received regarding demolition activities and the presence of hazardous materials, including polychlorinated biphenyls (PCB) on site. During the site visit, TDEC observed approximately 24 transformers and 80 capacitors labeled as containing PCBs. Also in September 2006, the Commissioner of TDEC received a letter from the Mayor of Hamblen County expressing his concern about the potential for release of on-site PCBs, asbestos, and other chemicals during the ongoing salvage operation. During an October 2006 discussion among EPA personnel, A&E Salvage Company personnel, a Liberty Fibers representative, the court-appointed trustee, and TDEC personnel, A&E Salvage Company acknowledged

1955 Evergreen Blvd., Suite 300, Duluth, GA 30096
Tel 678.775.3080 Fax 678.775.3138
www.tetratech.com

ownership of the PCB equipment, and that the company would accept full legal responsibility for proper removal and disposal of the PCB equipment in compliance with appropriate regulations.

A&E Salvage Company submitted a plan to EPA in January 2007 for the sampling and removal of all transformers and capacitors located on site. A&E Salvage Company contracted SD Myers to sample the dormant on-site transformers and capacitors for PCB analysis. The energized PCB units could not be sampled until Morristown Utilities ran new service to the site so that existing PCB energized units could be de-energized, removed from service, and disposed. SD Meyers sampled 39 transformers, of which 16 transformers were found to contain or were contaminated with PCBs and 23 transformers did not contain PCBs. A&E Salvage Company contracted Booher Industrial Company, based in Jasper, GA, to remove and dispose of the PCB transformers. However, EPA later informed A&E Salvage Company that Booher Industrial Company was not an EPA-approved commercial storage and disposal facility for PCB-regulated waste.

In March 2007, A&E Salvage Company held a meeting with IPI Business and Morristown Utilities, during which the City of Morristown decided to annex the Liberty Fibers site and include the site as part of its Urban Growth Boundaries. As a result, the City of Morristown would be responsible for providing utility services, including power and water, to the Liberty Fibers site.

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 the Emergency Response and Remediation Branch (ERRB) about conducting a removal assessment of the facility. EPA On-scene Coordinator (OSC) Spurlin contacted the EPA and TDEC representatives involved with the facility to discuss the site and review documentation. OSC Spurlin, supported by Tetra Tech, as well as representatives from TDEC, EPA Asbestos, EPA RCRA, and EPA Toxic Substances Control Act (TSCA) Enforcement programs, conducted a site visit on March 20 and 21, 2008. EPA and Tetra Tech were joined by Mr. Mark Sawyer, a local investor in A&E Salvage Company, and Mr. Tom Montgomery, a former employee of Liberty Fibers Corporation. During the site visit, EPA and Tetra Tech observed several drums, totes, and tanks; bags labeled as “asbestos containing material;” a 50,000-gallon sulfuric acid tank containing approximately 8 inches of product; known and suspected PCB containing articles and oils; suspected asbestos containing material (ACM); and discolored soil throughout the property. In addition, Mr. Montgomery identified an on-site concrete vault that contained six 10,000-gallon tanks used to store carbon disulfide, an extremely flammable chemical used in manufacturing rayon (see Figure 2 in Appendix A). The vault is typically filled with water, submerging the tanks, to reduce the risk of fire and explosion. Mr. Montgomery also identified a leak in the western wall of the vault, as a result of which the tanks were only half-way submerged.

Soil, surface water, and waste samples were collected during the March 2008 site visit. A grab surface soil sample (LF-SS-01) collected from the soil directly beneath the leak in the western wall of the carbon disulfide tank vault contained 0.927 milligrams per kilogram (mg/kg) of carbon disulfide. A composite surface soil sample (LF-SS-02), collected from a ditch where TDEC personnel had observed two transformers during a previous visit, contained 0.362 mg/kg of the PCB Aroclor 1260. A surface water sample (LF-SW-01), collected from the afore-mentioned ditch, contained 2,480 micrograms per liter (µg/L) of the PCB Aroclor 1260. A waste sample, collected from oil-soaked saw dust located within a non-permitted PCB storage area, contained 380 mg/kg of the PCB Aroclor 1260.

SITE ACTIVITIES

December 3, 2009

On December 3, 2009, OSC Gaughan of the EPA Emergency Response and Removal Branch, Tim Frederick of the EPA Technical Services Section, Lee Barron of the TDEC Division of Remediation, and Tetra Tech START site manager Paul Prys assembled at the site at 0945 hours in preparation for a site tour and inspection activities. EPA, TDEC, and Tetra Tech START personnel met with Mr. Mark Sawyer, owner of Lowland Industrial Park, Inc., prior to the site tour and inspection to discuss current activities on site. Mr. Sawyer stated that two tenants from the previous owner and one recent tenant occupied the site at the time of the site reconnaissance. Recycling and reclamation operations were ongoing, and at least one metals recycling business was operating on site.

EPA, TDEC, and Tetra Tech START personnel entered the site and established a decontamination staging area located at 35.97473 degrees north latitude and 83.94653 degrees west longitude. All personnel donned Level C (full-face respirator with P-100 cartridges, two Tyvek suits, rubber overboots, and nitrile gloves) personal protective equipment (PPE) prior to entering the site. Site activities included visual inspection of suspect ACM and ACM mixed with demolition debris around the site. Photographic documentation of the suspect ACM was recorded by Tetra Tech START personnel.

OSC Gaughan briefed Mr. Sawyer on the findings of the site tour, and indicated that he and Tetra Tech START would return the following day to discuss other points of interest at the site. At about 1555, all EPA and Tetra Tech START personnel left the property for the day.

December 4, 2009

OSC Gaughan and Tetra Tech START met with Mr. Sawyer to discuss current activities at the site and other items of interest. Mr. Sawyer accompanied OSC Gaughan and Tetra Tech START for a tour of the site. Due to a rain event earlier in the day and the wet ground surface, site reconnaissance activities were conducted in Level D PPE. The following items of interest (see Figure 2 in Appendix A) were noted during the site tour:

- In addition to Lowlands Industrial Park, Inc., which owns the former Liberty Fibers facility, a former nylon plant is located in the south-central portion of the property.

- A polyester synthetic staple plant is located adjacent to the southeastern corner of the property. The polyester synthetic staple plant appeared to be operational at the time of the site reconnaissance.

- The Welding Shop contained two PCB transformers, 89 capacitors in three lined totes, two plastic totes labeled “PCB Oil,” and two super sacks labeled, respectively, “Mercury Contaminated Equipment” and “Mercury Contaminated Soil” in a containment area. The containment area was observed to be constructed of a 6- to 8-inch high concrete berm and concrete floor; the concrete floor was lined with black polyethylene sheeting and saw dust. Approximately 200 square feet (ft^2) of sawdust under transformers and totes was visibly wet. The plastic totes located at the southern end of the building were labeled “Waste Oil” and appeared to be empty. Seven 55-gallon plastic drums were located at the northern end of the building. Two drums were labeled “Corrosive,” two drums were labeled “Cooling Water Treatment Solutions,” and three drums were not labeled but appeared to contain waste oil.

- A building identified as the Power Mechanical Shop – Rayon Staples contained a large number of full asbestos disposal bags with generator labels. All windows and doors were covered with polyethylene sheeting and secured with wooden slats. The disposal bags were located at the northern end of the building.

- The carbon disulfide tank vault observed in the northwestern corner of the property did not contain any carbon disulfide tanks. According to Mr. Sawyer, the carbon disulfide tanks were removed around spring 2009 because of concern for explosion and were sold for scrap metal. Mr. Sawyer also indicated that the tanks did not contain carbon disulfide at the time of removal. During the site reconnaissance, the water that submerged the tanks remained in the vault.

- The 50,000-gallon sulfuric acid storage tank located on the western side of the site was suspected to contain about 8 inches of product.

- Mr. Sawyer stated that approximately 10 to 20 PCB transformers had been sold to Booher Industries. Eleven transformers remained on site: four had been left on a truck, three in the pump house, one on-line at the Administration Building with a spare next to it, and two in storage.

- Two neutralization basins located on the western side of the facility were suspected to contain waste from lye neutralization processes conducted at the facility.

- BASF had remediated approximately 8.99 acres of soil contaminated with coal dust near the Power House afterburner. Coal previously had been stored in that area of the property for use at the Power House.

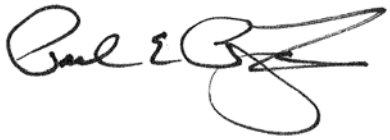
- Dirt mounds located around a demolished clarifier tank on the western side of the facility were suspected to contain buried asbestos materials from the site.

- A partially demolished building containing waste oil drums was located on the western side of the facility. North of this partially demolished building was another partially demolished building that was previously owned by Lowland Recycling and Lowland Metal Process, Inc. The owners had accepted materials for dismantling and recycling.

Based on current site conditions, OSC Gaughan concluded that an emergency removal action was not warranted. At approximately 1240, EPA and Tetra Tech START personnel demobilized from the Liberty Fibers site. Information gathered during the site reconnaissance was used to prepare a sampling and analysis plan for additional removal assessment activities at the property. All future activities at the site will be at the discretion of EPA.

If you have any questions or need additional copies of this draft letter report, please call me at (678) 775-3106 or Andrew Johnson at (678) 775-3100.

Sincerely,



Paul E. Prys II
START III Site Manager

Andrew F. Johnson
START III Program Manager

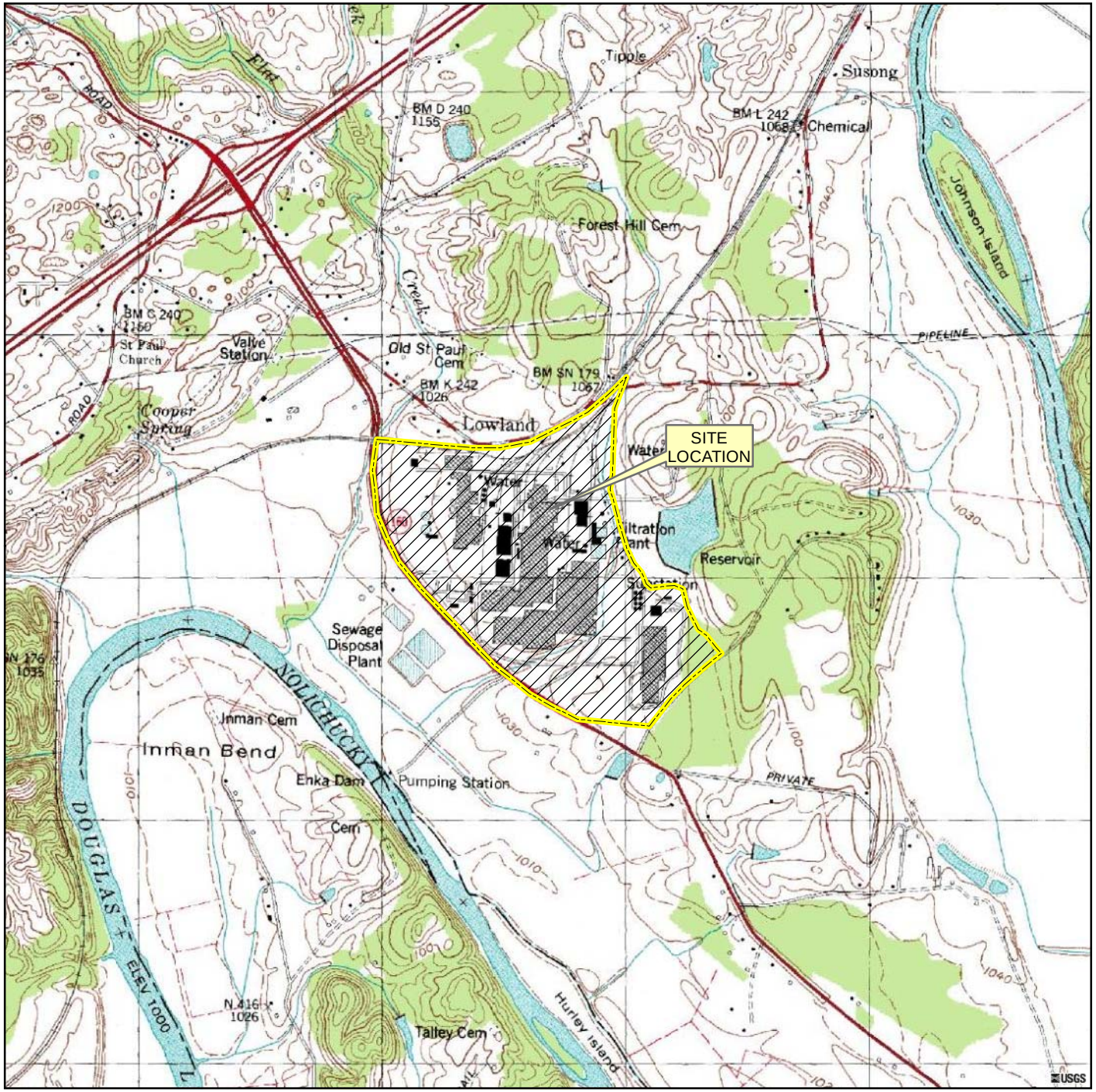
Enclosures (4)

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

APPENDIX A

SITE FIGURES

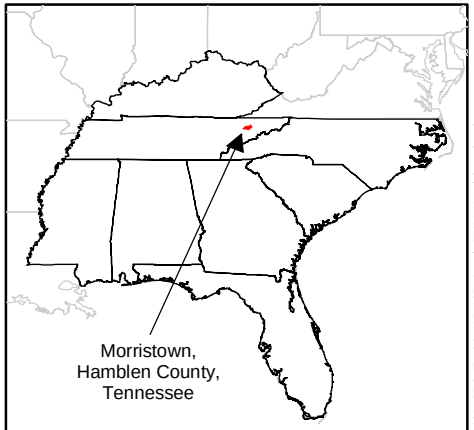
(Two Pages)



0 1,000 2,000 Feet

1:24,000

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



United States Environmental Protection Agency

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

FIGURE 1
SITE LOCATION

TETRA TECH

2010-2-10 \GIS_Workspace\TTEMI-05-003-0041_Liberty_Fibers\Figures\GIS\MXDs\Site Location Maps\R IV START SITE LOC MAP 1-07-10.mxd TTEMI-KY dale.vonbusch

Carbon Disulfide Vault

Neutralization Pit 2

Rayon Staple Plant

Neutralization Pit 1

Clarifier

Cooling Tower

After Burner

Power House

Power Mechanical Shop (Location of bagged asbestos)

Clarifier

Clarifier

Welding Shop (Location of totes containing mercury)

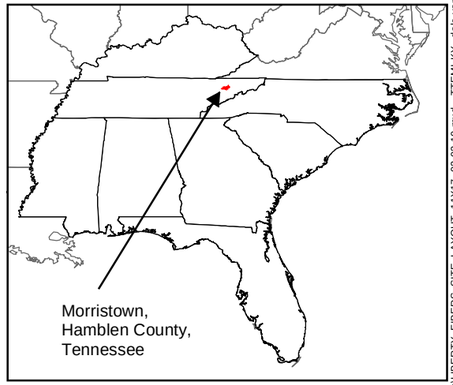
Training Center

LEGEND

- Existing Structure
- Former Structure
- Approximate Property Boundary

Aerial Image Source:
04/2008 GlobeXplorer

0 150 300
Feet
1:3,600



United States
Environmental Protection Agency

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

FIGURE 2
SITE LAYOUT

TETRA TECH

2010-2-10 IGIS Workspace\TTEMI-05-003-0041_LIBERTY_FIBERS\Figures\GIS\MXDs\Site Layout Maps\LIBERTY_FIBERS_SITE_LAYOUT_11X17_02-02-10.mxd TTEMI-KY dale.vonbusch

APPENDIX B

LOGBOOK NOTES

(10 Pages)

"Rite in the Rain"®

ALL-WEATHER

JOURNAL

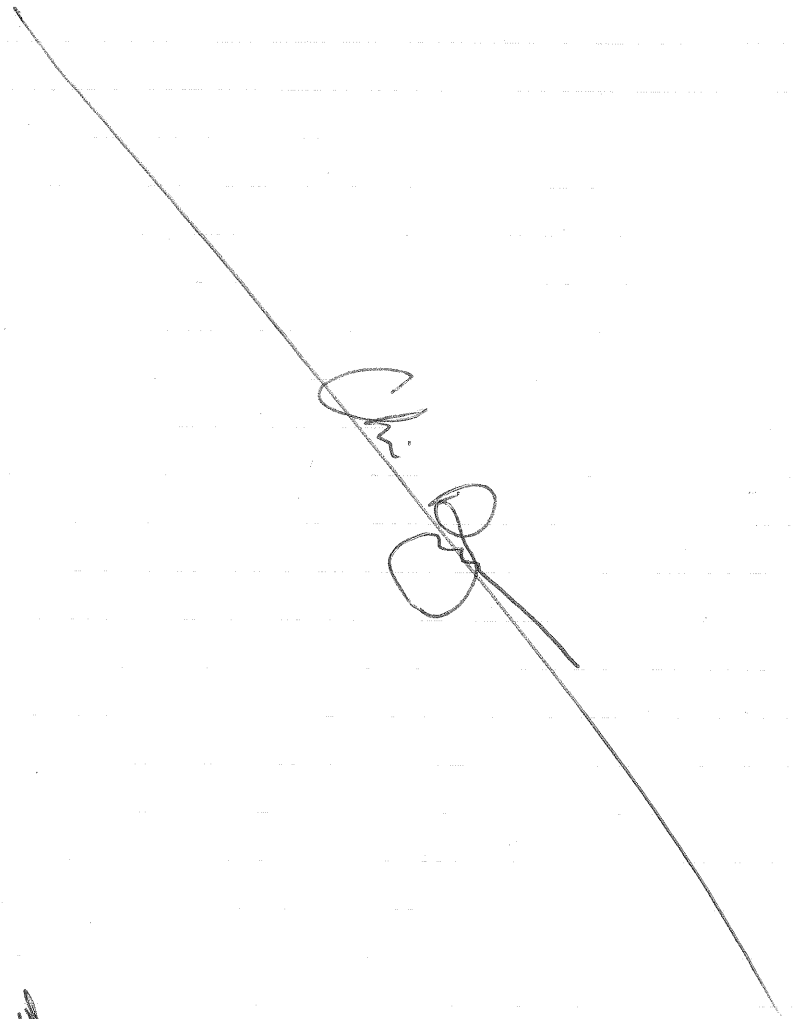
No. 391

LIBERTY FIBERS

ITEM I-05-003-0041

BOOK 1

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



DECEMBER 3, 2009

WEATHER: Cloudy High of 47°F

SCOPE: Site Investigation at Liberty Fibers

0925 START PPE on site.

0945 EPA Peggy Gaughan AND Tim FREDERICK AND TDEC LEE BARROW. (865-898-9204). DISCUSSED the site AND its history. THERE is the potential for asbestos abatement wastes from outside projects being dumped at this facility. Former facility may have been split into 3 groups with different owners.

1000 EPA, TDEC AND START met with Mark Sawyer (owner) Lowland Industrial Park, Inc. Facility has 2 tenants from previous owner. AND 1 recent tenant. OSC Gaughan explained to Mr. Sawyer we would conduct a site walk through AND discuss our findings with him later.

1025 EPA, TDEC AND START entered the site AND proceeded to a staging area. to DRESS out in level C prior to conducting walk-through. (Staging AREA located AT N 35.97473° W -83.94653). Each team member wore a Full-Face respirator with P-100 Filters, 2 tyvek suits, rubber booties, AND nitrile gloves.

December 3, 2009

1045 EPA, TDEC AND START BEGAN walk-through of approximately 300 acres of the facility to identify possible asbestos containing materials. The team began the walk through on the west side of the facility looking through debris from partially demolished building and moving east toward the Power Building. Potential asbestos containing materials were detected in the following locations:

- In roofing felt at various locations around demolished buildings on the site. Roofing felts were mixed with various forms of demolition debris.
- In pre-cast mudded TSI in above ground pipelines covered by a metal jacket. Portions of the TSI were mixed with demolition debris and were heavily damaged. All of the pre-cast TSI was wet due to recent rain activity.
- In demolished ductwork mixed with demolition debris. Vapor barrier on paper backing could potentially contain asbestos.
- Various pipe joint seals mixed with demolition debris.
- Paper wrapped TSI (possibly Air-o-cell) inside an abandoned building located on

December 3, 2009

- vertical pipe runs.
- Possible expansion joint on west side of power building and in demolition debris. At same location.
- In pre-cast mudded TSI on pipe runs covered by metal jackets. Associated with the afterburner located at the northeast corner of the Power Building.
- On the exterior of the afterburner located at the northeast corner of the Power Building. Unit appears to have mudded trowled on exterior held in to place by wire mesh. The exterior of the insulation is damaged in various locations. The TSI above and below the afterburner ranges from intact to significantly damaged.

1205 EPA, TDEC and START completed the site walk-through.

1230 EPA, TDEC and START off-site for lunch and to discuss the site walk-through.

1345 EPA and START returned to the site and reviewed the ATC report (asbestos survey).

1400 OSC Gaughan, EPA Frederick, and START Pays re-entered the site to conduct a walk through of visual points of interest

December 3, 2009.

1400 as well as photodocumentation of the site. Photolog is located on pages 43-44 of the logbook.

1535 EPA and START completed drive through of the facility. EPA and START discussed our findings and possible costs associated with the cleanup.

1555 START and EPA ~~departed~~ (PP). off-site.

(PP)

TDEC Contacts

Lee Barron LEE.BARRON@TN.GOV
(o) 865-594-5482 (c) 865-898-9204

Paula Plant PAULA.PLANT@TN.GOV
(o) 865-594-5474

(PP)

EPA Contacts

OSC Perry Gaughan GAUGHNAN.PERRY@EPA.GOV
(o) 404-562-8817 (c) 404-909-2930

Tim Frederick
(o) 404-562-8896

3 DEC 2009

December 4, 2009

Weather: Cloudy High of 44°F

Scope: Site Investigation at Liberty Fibers.

0900 START PMs met with OSC Gaughan to discuss the site and to review the June 11, 2008 Report. OSC questions concerning a concrete slab that may have once stored PCB transformers. START PMs contacted (PP) TDEC ~~Scott~~ Barbara Scott concerning their location. She said transformers were near a road by the railroad tracks on a concrete slab and were not marked. OSC tasked START PMs to put together a cost estimate for the removal of the following:

- Asbestos pile west of the Power Bldg (~ 7 tons)
- ACM from the afterburner.
- Materials from the neutralization tanks on west side of property.
- Materials from the burial mounds near clarifier on west side of property.
- TSI from elevated pipe run stretching from Power Bldg to asbestos pile.
- TSI from elevated pipe run stretching from burial mounds to (PP) building east of the mounds.

1005 OSC Gaughan and START PMs arrived on site to speak to Mr. Sawyer (property owner).

December 4, 2009

1015 OSC Gronghon and START Pngs began site walk through with Mr. Sawyer. Stopped at partially demolished building with waste oil drums. North of that building was a partially demolished building that was previously owned by Lowland Recycling and Lowland Metal Processing Inc. Owners accepted materials for dismantling and recycling.

1020 Arrived at building with a sign that said "Powder Mech Shop - Rayon Staples". All windows and doors were covered with polyethylene sheeting. START Pngs and OSC Gronghon looked inside the building through a hole cut in the poly barrier. Asbestos bags with generator labels were stacked 10-15 feet inside. Bags were located at the north end of the building.

1035 Arrived at the Powder Building. New soil near the afterburner. Mr. Sawyer said, approx. 1 year ago, BASF remediated the soil of coal dust. Coal had been previously stored there for use a the Power Bldg. BASF remediated approx 8.99 acres. Remediation may have been performed by Arcadis. BASF owns the ~~former~~ (FF) capped landfill at the northeast corner of the facility and a

December 4, 2009

1035 capped fly ash pit east of the Power Bldg. Mr. Sawyer owns the reservoir east of the fly ash pit.

Proceeded to top of BASF capped landfill where Mr. Sawyer gave a overview of the property. Facility information is as follows:

- The facility southeast of his property is polyester synthetic staple.
- The facility center of the south end of his property is a nylon plant.
- The 50,000 gallon sulfuric acid storage tank at the center of his property on the west side of the facility may still have 8 inches of product in it and it has not been touched.
- There is no product currently stored in the diesel storage tank.
- There was no product in the CS_2 tanks located at the northwest corner of the facility. Tanks were removed around Spring 2009 because of concern for ~~explosion~~ (FF) explosion and cut up for scrap. Mr. Sawyer said he discussed it in EPA Attorney Joan Redleaf Durbin's office.
- Mr. Sawyer said that approximately 10-20 PCB transformers were sold to Booker

December 4, 2009

1035 - Industries. Four were left on a truck, 3 in the pump house, 1 on-line at the Admin Bldg with a spare next to it, and 2 in storage.
- BASF inactive site manager is Charlie Waltz (973) 245-6595.
- Mike Ball is supposedly conducting scrap metal recovery at nylon plant.
- ACT and Mr. Sawyer verbally agreed to $35,000 fee to survey Power Bldg and to provide oversight of the Power Bldg abatement.

1120 Arrived at welding shop where PCB transformers were stored. There were 2 PCB transformers and 89 capacitors stored in 3 totes at the northeast corner of the bermed area. Two totes were filled with PCB oil and 4 totes were empty at the south end of the bermed area. Two spots in the northeast corner have moisture in the sawdust (~50 ft²). Approx. 200 ft² of sawdust under transformers and totes was visibly wet. Northwest corner has 2 poly 1 ton totes with mercury contaminated soil and equipment. At the south end of the bldg there were (PP) empty waste oil totes. At the north end of

December 4, 2009

1120 bldg, there were two drums of acid marked "Corrosive" not on pallets with a 5 gallon metal can of refrigeration (PP) oil sitting on top. Visible corrosion around bungs & (PP) and base of can. At the northwest corner of the bldg were possibly 5 drums of cooling water treatment solution. All drums were 55 gallon. The elevated piping in the building appeared to have asbestos containing TSI.

1145 Arrived at the burial mounds (PP) near the clarifier on the west side of the facility. Mounds were located around the demolished clarifier.

1150 Arrived at west neutralization (PP) basins. North and south basins may contain waste from lye neutralization processes. Lye containment area is located northeast of basins.

1155 Mr. Sawyer informed OSC Gaughan, that since the Spring of 2007, he has disposed of 30 to 40 roll offs of asbestos waste to State approved landfills (Randall Harris). TDEC Pamla Plant stopped his disposal in Mar/Apr 2008. Mr. Sawyer said he has not disposed of any transformers since taking

December 4, 2009

1155 ownership. He has not disposed of any oil except for straight motor oil. OSC Gaughan informed Mr. Sawyer that TDEC was concerned that asbestos waste was being dumped on his property from the scrap metal salvaging operations at the nylon plant.

1200 Mr. Sawyer informed OSC Gaughan that he had the crew to handle the bagged (PP) ~~waste~~ asbestos waste on site but didn't have the financial means to remove the asbestos on the pipes.

1215 OSC Gaughan and START Pays completed the site walk through with Mr. Sawyer.

1220 OSC Gaughan and START Pays discussed the site walk through.

1240 EPA and START departed the site.

1420 START Pays arrived on-site (PP) TVA Kingston to speak with TDEC Scott concerning the location of possible ~~buried~~ transformers on site.

1800 START Pays demobilized from TVA Kingston site to Duluth, GA office.

4 DEC 2009

~~December 18, 2009~~ (PP)

January 18, 2010

Weather: Mostly Sunny High of 55°F.

Scope: Mobilization and site walk ~~Through~~ (PP) Through.

0730 START Pays departed from home to mobilize to Liberty Fibers.

0800 START Pays picked up START Jones and mobilized to Liberty Fibers.

1155 START Pays and Jones arrived at Liberty Fibers and waited for the rest of the personnel to arrive.

1205 Resolution Inc Cory Williamson arrived on site. START Pays briefed him on site activities.

(PP) 1240 1215 Tetra Tech Talley arrived at the site.

1240 Team entered the facility.

1245 START Pays conducted safety meeting.

1300 START Jones and Talley left for lunch. START Pays and RI (PP) Williamson set out AREA pumps.

1324 Placed low volume pump on van bumper to see if van will stir up any asbestos while sitting out AREA pumps. (LF-FPIAA-01).

1336 Stopped next to CS_2 vault to place 1st AREA pump along west fenceline. (LF-PIAA-01)

Photolog

January 19, 2010

Photo #	Time	Location	O	P
P4010011	1105	Sample LF-AS-011	SE	
P1010012	1114	Sample LF-AS-012	W	
P1010013	1115	Weathered insulation mixed w/debris	W	
P1010014	1121	Sample LF-AS-013	NA	
P1010015	1129	Sample LF-AS-014	NA	
P1010016	1130	Sample LF-AS-015	NA	
P1010017	1137	Sample LF-AS-016	NA	
P1010018	1140	Sample LF-AS-017	NA	
P1010019	1142	Sample LF-AS-018	NA	
P1010020	1145	Sample LF-AS-019	NA	
P1010021	1408	Sample LF-AS-020	NA	
P1010022	1419	Sample LF-AS-022	NA	
P1010024	1419	Sample LF-AS-021	NA	
P1010025	1427	Sample LF-AS-023	NA	
P1010026	1435	Sample LF-AS-024	NA	
P1010027	1444	Sample LF-AS-025	N/A	
P1010028	1444	Sample LF-AS-025	NA	
P1010029	1449	Sample LF-AS-026	NA	
P1010030	1456	Sample LF-AS-027	NA	
P1010031	1459	Sample LF-AS-028	NA	
P1010032	1503	Sample LF-AS-029	NA	
P1010033	1504	Possible Transite Pipe	W	
P1010034	1509	Sample LF-AS-030	NA	

Photolog

December 4, 2009

Photo #	Time	Location	O	P
img_2961	1125	Cooling Water Treatment Label	N/A	PP
2962	1126	Corrosion Around Drum Bung	N/A	
2963	1127	Refrig Oil on top of Corrosive Drum	N	
2964	1128	Potential ACM - TSI	S	
2965	1128	Mudded Pipe Elbow	SW	
2966	1129	Potential ACM - TSI	S	
2967	1130	Mercury Contaminated Waste	N/A	
2968	1130	↓	N/A	
2969	1134	Wet Sawdust Around Capacitors	SE	
2970	1134	↓	E	

PP

Photolog

January 19, 2010

Photo #	Time	Location	O	P
P1010001	0936	Sample LF-AS-001	NA	PP
P1010002	1015	Sample LF-AS-002	NA	
P1010003	1019	Sample LF-AS-003	NA	
P1010004	1028	Sample LF-AS-004	NA	
P1010005	1030	Sample LF-AS-005	W	
P1010006	1043	Sample LF-AS-006	SE	
P1010007	1045	Sample LF-AS-007	NA	
P1010008	1050	Sample LF-AS-008	NA	
P1010009	1057	Sample LF-AS-009	NA	
P1010010	1102	Sample LF-AS-010	SE	

Photolog

December 4, 2009

Photo #	Time	Location	O	P
IMG_2938	1021	Possible Bagged Asbestos Waste	SE	PP
2939	1021	↓	SE	
2940	1021	Liberty Fibers Label on Waste Bags	N/A	
2941	1022	↓	N/A	
2942	1022	Lead Hazard Sign above Waste Bags	S	
2943	1022	Possible Bagged Asbestos Waste	E	
2944	1040	Facility Overview - Reservoir	S	
2945	1040	Facility Overview - Fly Ash Pond	S	
2946	1040	Facility Overview	SW	
2947	1040	↓	W	
2948	1120	Plastic Totes for PCB Waste Oil	N	
2949	1120	↓	N	
2950	1121	Plastic Totes and Transformers	N	
2951	1121	Poly lined beam with sawdust	NW	
2952	1122	Plastic Tote and Transformer	NW	
2953	1122	↓	W	
2954	1122	Plastic Totes for waste oils	S	
2955	1122	used oil label on tote	S	
2956	1123	Plastic totes and Transformers	SE	
2957	1124	3 totes containing 89 capacitors	E	
2958	1124	55 gal blue plastic Drums - corrosive	N	
2959	1124	↓	N	
2960	1125	55 gal plastic Drums	N	

Photolog

December 3, 2009

Photo #	Time	Location	O	P
IMG_2918	1501	Debris with Storage Tanks	SW	PP
2919	1502	Deteriorated TSI on ground	N	
2920	1512	Unknown Debris in neutralization pit	NW	
2921	1512	↓	NW	
2922	1515	↓	W	
2923	1517	Carbon Disulfide Tank Pit	NW	
2924	1518	Sign at CS_2 Tank Pit	NW	
2925	1520	Carbon Sulfide Tank Pit	SE	
2926	1520	Debris on Facility	E	
2927	1521	↓	SE	
2928	1521	↓	S	
2929	1522	Carbon Disulfide Tank Pit	NE	
2930	1522	↓	NE	
2931	1523	↓	NE	
2932	1528	Dirt Piles Possibly Covering Debris	W	
2933	1528	↓	NW	
2934	1529	Possible Deteriorated ACM	W	
2935	1530	↓	W	
2936	1530	Demo'd Pipe Run w/ Exposed TSI	E	
2937	1534	Demo'd Bldg with Exposed TSI	NE	

3 DEC 2009

Photolog

December 3, 2009

Photo #	Time	Location	O	P
Img_2895	1151	Capacitor in Debris pile	NW	PP
2896	1408	E. side of Power mech. Rayon Staple Bldg	NE NW	PP
2897	1409	S. End of Power mech Rayon Staple Bldg	NE NW	PP
2898	1410	↓	NE	
2899	1410	W. side of Power mech Rayon Staple Bldg	NE	
2900	1411	↓	NE	
2901	1411	↓	NE	
2902	1412	N. End of Power mech Rayon Staple Bldg	SE	
2903	1424	Mudded Pre-Cast TSI	SE	
2904	1425	Deteriorated mudded TSI	SE	
2905	1425	Potential Acm in pile	SE	
2906	1429	↓	E	
2907	1432	Demo Pipe Run w/Exposed TSI	E	
2908	1432	↓	E	
2909	1437	Storage Tank w/Possible Acm	SW	
2910	1439	Recently Disturbed Soil	NW	
2911	1439	Storage Tank w/ Possible Acm	NW	
2912	1440	Deteriorated TSI at base of tank	SW	
2913	1441	↓	S	
2914	1442	↓	SE	
2915	1443	↓	S	
2916	1444	Deteriorated TSI on tank	S	
2917	1500	Debris with Storage Tanks	W	

SAMPLE SITES

~~1. Several PCB/8 RCRA soil (2 Cum)~~
~~2. 1 PCB water sample in ditch~~
~~3. 1 water sample for VOLS (CS_2)~~
~~4. 1 soil sample for VOLS (CS_2)~~

SAMPLES

LF-SS-Ø1 – soil for VOLS (CS_2)
2 EA 2 oz

LF-SW-Ø1 – SW for PCBs
2 EA 1 L amber

LF-SS-Ø2 – soil for PCBs
1 EA 8 oz

LF-ACM-Ø1 – suspect ACM
1 EA 2 oz

LF-PW-Ø1, Ø2, Ø3 – PCB wipes (100 cm^2)
3 EA 4 cm^2 wipe w/ hexane

LF-PS-Ø1 – PCB sandust
1 EA 8 oz

LF-PL-Ø1 – PCB oil
1 EA 8 oz

9 Total (inc. 3 wipes)

APPENDIX C

PHOTOGRAPHIC LOG

(22 Pages)

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southwest	**Date:**	December 4, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA
Subject:	Limited overview of Liberty Fibers Site as seen from atop a closed landfill located at the northeastern corner of the facility.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southwest	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA

Subject: Building demolition debris on northwestern side of property with the 50,000-gallon sulfuric acid storage tank visible in the background. The owner estimated the storage tank contained approximately 8 inches of product.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	East	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA

Subject: Aboveground pipe run with suspect asbestos-containing pipe insulation appeared to be damaged during building demolition.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southeast	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA
Subject:	Suspect asbestos-containing pipe insulation mixed with building demolition debris.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southeast	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA
Subject:	Weathered suspect asbestos-containing pipe insulation mixed with building demolition debris.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	North	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA

Subject: Suspect asbestos-containing pipe insulation inside damaged metal jacket mixed with building demolition debris.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southeast	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA

Subject: Suspect asbestos-containing roofing material mixed with building demolition debris.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southwest	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA
Subject:	Power House and associated afterburner. Suspect asbestos-containing materials are associated with the Power House and the afterburner.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	South	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA
Subject:	Damaged suspect asbestos-containing insulation covering the Power House afterburner.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	South	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA

Subject: Damaged suspect asbestos-containing insulation beneath the Power House afterburner.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southwest	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA
Subject:	Damaged suspect asbestos-containing pipe insulation beneath the Power House afterburner.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	West	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA

Subject: Weathered suspect asbestos-containing material mixed with demolition debris near clarifier located on the western side of the property.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southeast	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA

Subject: Northern end of Power Mechanical Rayon Staple building used to store bags of asbestos waste for disposal. Wood slats and polyethylene sheeting was used to seal the entrances and windows of the building.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southeast	**Date:**	December 4, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA
Subject:	Bagged asbestos waste stored inside the Power Mechanical Rayon Staple building awaiting disposal.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Northwest	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA
Subject:	One of two neutralization pits located in the northwestern portion of the property. The contents of both pits are unknown.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Northeast	**Date:**	December 3, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Tim Frederick, EPA

Subject: Concrete vault that previously held six 10,000-gallon carbon disulfide tanks submerged in water. Owner removed east side of vault wall to salvage tanks. Therefore, the contents of the vault appear to be leaking onto the ground surface on the eastern side of the vault.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Southeast	**Date:**	December 4, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA

Subject: Polychlorinated biphenyl (PCB)-contaminated transformers and plastic totes containing PCB oil inside the containment area located inside the Welding Building. The containment area has a 6- to 8-inch high berm, concrete floor, and is lined with black polyethylene sheeting. Saw dust is located on top of the polyethylene sheeting as an absorbent.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	East	**Date:**	December 4, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA

Subject: Three lined, plastic totes with PCB-contaminated capacitors inside the containment area located in the Welding Building. A small area in front of one of the totes appears to be wet.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	Not Applicable	**Date:**	December 4, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA

Subject: Mercury-contaminated soil stored inside a super-sack in the containment area located in the Welding Building.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	South	**Date:**	December 4, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA
Subject:	Plastic totes labeled “Waste Oil” staged at the southern end of the Welding Building.		

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	North	**Date:**	December 4, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA

Subject: Plastic 55-gallon drums stored on pallets at the northern end of the Welding Building. The two drums on the left are labeled "Cooling Water Treatment." The three drums on the right appeared to contain waste oil.

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

TDD Number:	TTEMI-05-003-0041	**Location:**	Liberty Fibers Site
Orientation:	North	**Date:**	December 4, 2009
Photographer:	Paul Prys, Tetra Tech	**Witness:**	Perry Gaughan, EPA

Subject: Two 55-gallon drums labeled "Corrosive" located at the north end of the Welding Building. The drums were not stored on pallets.

APPENDIX D

TABLE OF WITNESSES

(One Page)

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

Mr. Perry Gaughan
On-Scene Coordinator
U.S. Environmental Protection Agency
61 Forsyth Street, SW – 11th Floor
Atlanta, GA 30303
Telephone No.: (404) 909-2930
gaughan.perry@epa.gov

Mr. Tim Frederick
Toxicologist/Life Scientist
U.S. Environmental Protection Agency
61 Forsyth Street, SW – 11th Floor
Atlanta, GA 30303
Telephone No.: (404) 562-8598
Frederick.tim@epa.gov

Mr. Lee Barron
Tennessee Department of Environment and Conservation
Division of Remediation
Knoxville Field Office
3711 Middlebrook Pike
Knoxville, TN 37921
Telephone No.: (404) 562-8748
lee.barron@tn.gov

Mr. Paul Prys
Site Manager
Tetra Tech EM Inc.
1955 Evergreen Boulevard, Suite 300
Duluth, GA 30096
Telephone No.: (678) 775-3080
paul.prys@tetratech.com

Mr. Mark Sawyer
Owner
Lowland Industrial Park, Inc.
4901 Enka Highway
Lowland, TN 37778
Telephone No.: (423) 736-5791