

November 25, 2014

Mr. Steve Spurlin
On-Scene Coordinator
United States Environmental Protection Agency
Ed Jones Federal Building, B-13
109 South Highland Avenue
Jackson, Tennessee 38301

**Re: Biweekly Progress Report No. 14
Reporting Period November 8, 2014 through November 21, 2014
Beech Creek Superfund Site
Wayne County, Tennessee**

Dear Mr. Spurlin:

This biweekly progress report has been prepared for the Beech Creek Superfund Site in Wayne County, Tennessee (the "Site"). This report is being submitted by ENVIRON International Corporation on behalf of GMO Threshold Timber Tennessee LLC, International Paper Company, and Battery Properties, Inc. as signatory parties (Respondents) to the administrative settlement agreement and order on consent (AOC) with the United States Environmental Protection Agency (USEPA), effective February 20, 2014. As required by Section VIII, Paragraph 34(a) of the AOC, this report addresses the activities conducted during the reporting period at the Site. The report also indicates planned activities for the next reporting period.

Section VIII, Paragraph 34(a), requires that progress reports be submitted every 14 days after receipt of USEPA approval of the Sampling and Analysis Plan. Approval was received on Tuesday, May 13, 2014. Progress reports will be submitted every other Tuesday (i.e., every 14 days) and will include analytical results and activities through the prior Friday (i.e., the reporting period).

Activities Performed During the Reporting Period

The following activities were performed during this reporting period:

- Submittal of Biweekly Progress Report No. 13 dated November 11, 2014.
- Mobilization to the Site to begin the construction phase of the time-critical removal action on November 10, 2014. Field work performed included documenting and marking the trees that will be felled prior to implementing soil and sediment removal activities.
- Submittal of the implementation schedule requested by USEPA in a letter dated November 11, 2014.
- Evaluation of potential equipment and procedures that could be used to fell trees in advance of mobilizing the contractor slated to remove soils and sediment.
- Continued outreach with the potential construction contractors.

The milestone schedule that was submitted with the Field Sampling Plan has been updated, as necessary, to reflect the activities performed during this reporting period. A copy of the updated schedule is included in Attachment 1.

Problems Encountered and Their Resolutions

The following problems were encountered during this reporting period:

- None.

Analytical Data Received During the Reporting Period

The following analytical data were received during this reporting period:

- No new analytical reports were received from the laboratory during this reporting period.
- No validation reports were received during this reporting period.

The data generated to date have been presented in the *Excavation and Disposal Work Plan*, which was submitted on October 22, 2014. When additional data are received as part of the construction phase of the project, they will be provided in Attachment 2.

Anticipated Activities during the Next Reporting Period

The following activities are planned for the next reporting period:

- Continued evaluation of potential construction contractors to implement the excavation and disposal activities.
- No problems are anticipated during the next reporting period.

Closing

As required by Section VIII, Paragraph 34(b) of the AOC, two hard copies of this biweekly progress report have been submitted to your office via regular mail. The report is also being provided to you and the state of Tennessee via e-mail. At your request, we have also copied Todd Taylor of TetraTech on the e-mail containing the biweekly progress report. A hard copy version of the report has been sent to the state of Tennessee via regular mail.

If you have any questions or comments regarding the above, please feel free to contact me at 617.834.5847.

Sincerely,
ENVIRON International Corporation



Alan S. Fowler
Principal

cc: Evan Spann, Tennessee Department of Environmental and Conservation
Todd Taylor, TetraTech (via e-mail only)
Jennifer Nijman, Nijman Franzetti LLP

Attachments

Attachment 1
Project Milestone Schedule

Attachment 1
Sampling, Design, and Construction Milestone Schedule
Beech Creek Superfund Site

AOC Reference	Deliverable	Due Date	Due Date Description from AOC	Status
XXXI.96, p 35	AOC effective date	2/20/14	Effective date is 10 days after the AOC is signed by the regional administrator.	Effective date for the AOC is 2/20/2014.
VII.25, p 8	Notify USEPA of subcontractors' names and qualifications	5/23/14	10 days prior to commencement of work by subcontractor, if USEPA disapproves, a second must be provided within 30 days of USEPA's disapproval.	Identification letters for subcontractors to support sampling were provided on 5/16/14 and 5/27/14. Additional subcontractor notifications will be provided as needed.
VIII.29, p 9 IX.37, p 14 IX.38, p 14	Site access	3/24/14	If property is owned, access will be granted to Respondents and USEPA by AOC effective date. If property is not owned by Respondents, access agreements will be obtained within 30 days of effective date.	Property access from the Respondents is complete. Property access agreements to support soil/sediment sampling have been finalized. Property access agreements to support the construction phases of the program are in process.
VIII.30.a, p 9	Sampling and Analysis Work Plan (FSP and QAPP)	3/24/14	Submit draft 30 days following effective date of AOC.	Drafts of QAPP and FSP completed and submitted on 3/20/14.
VIII.30.b, p 10	Mobilize for sampling	6/4/14 (FSP and QAPP Approval received 5/13/14)	Within 15 business days of USEPA approval of FSP and QAPP, weather permitting.	Mobilization for sampling occurred on 6/2/14.
VIII.30.c, p 10	Excavation and Disposal Work Plan (inclusive of QAPP)	9/10/14 (FSP and QAPP Approval received 5/13/14)	Submit draft within 120 days of approval of FSP and QAPP.	Draft EDWP was submitted to the USEPA on 9/10/14.
VIII.30.d, p 11	Mobilize for remedial activities	11/26/14 (EDWP Approval received 10/28/14)	Within 20 business days of USEPA approval of Excavation and Disposal Work Plan, weather permitting.	Mobilization for tree marking occurred on 11/10/14. Mobilization of the soil/sediment removal contractor planned for late February 2015.
VIII.30.e, p 11	Revised Sampling and Analysis Work Plan	5/23/14 (Comments on QAPP received 4/10/14 and 5/8/14 [verbal]) 4/30/14 (Comments on FSP received 4/15/14)	Revised documents due within 15 days of receipt of USEPA comments.	QAPP Rev2 submitted 5/12/14 and approved 5/13/14. Revised FSP submitted 4/30/14 and approved 5/13/14.
VIII.30.e, p 11	Revised Excavation and Disposal Work Plan	10/22/14 (Comments received 10/7/14)	Revised documents due within 15 days of receipt of USEPA comments.	Final EDWP was submitted to the USEPA on 10/22/14.

Attachment 1
Sampling, Design, and Construction Milestone Schedule
Beech Creek Superfund Site

AOC Reference	Deliverable	Due Date	Due Date Description from AOC	Status
VIII.31, p 11	HASP	3/24/14	Submit within 30 days of effective date of AOC.	Draft of HASP completed and submitted on 3/20/14. HASP approved in USEPA letter dated 4/9/14. Final version of HASP submitted on 4/24/14.
VIII.32.b, p 12	Analysis of QA samples submitted by USEPA	Not Established	Upon request by USEPA.	None requested.
VIII.32.c, p 12	Notification of sampling	5/19/14	USEPA will be notified 14 days in advance of any sampling activities, unless shorter notice is agreed to by USEPA. USEPA has right to collect split samples or additional samples.	Notification of sampling activities scheduled to begin 6/2/14 was provided on 5/16/14.
VIII.33, p 12	Post-Removal Site Control Plan	Not Established	Submit proposal in accordance with Excavation and Disposal Work Plan schedule or at direction of USEPA. Implement upon USEPA approval and provide documentation of implementation to USEPA.	TBD
VIII.33, p 12	Notice of Land Use Restriction	Not Established	If land use restrictions are required by the Post-Removal Site Control Plan prepare and record notice in accordance with Excavation and Disposal Work Plan schedule or at direction of USEPA. Implement upon USEPA approval and provide documentation of implementation to USEPA.	TBD
VIII.34.a, p 12	Written progress reports	5/27/14 and every 14 days thereafter, as needed (FSP and QAPP Approval received 5/13/14)	Submit every 14th day following USEPA approval of FSP and QAPP until termination of AOC or upon notification by OSC.	BPR No. 1 submitted 5/27/14. BPR No. 2 submitted 6/10/14. BPR No. 3 submitted 6/24/14. BPR No. 4 submitted 7/8/14. BPR No. 5 submitted 7/22/14. BPR No. 6 submitted 8/5/14. BPR No. 7 submitted 8/19/14. BPR No. 8 submitted 9/2/14. BPR No. 9 submitted 9/16/14. BPR No. 10 submitted 9/30/14. BPR No. 11 submitted 10/14/14. BPR No. 12 submitted 10/28/14. BPR No. 13 submitted 11/11/14. BPR No. 14 submitted 11/25/14
VIII.35, p 13	Final report, with certification	Not Established	Submit within 60 days following completion of all work required under the AOC.	TBD

Attachment 1
Sampling, Design, and Construction Milestone Schedule
Beech Creek Superfund Site

AOC Reference	Deliverable	Due Date	Due Date Description from AOC	Status
VIII.36.a, p 13 VIII.36.c, p 14	Notification of waste shipments	Not Established	Prior to initial shipment of waste to an out-of-state facility, provide notification to receiving state and OSC. Notification should occur as soon as practical following contract award and before waste is actually shipped.	TBD
VIII.36.d, p 14	Off-Site Rule	Not Established	Obtain USEPA approval on any off-site waste disposal facilities before waste is shipped off site.	TBD
XIII.48, pp 16-17	Emergency situation involving a release or threatened release	Not Established	Immediately take action to respond to situation. Provide notification to OSC or Region 4 Regional Duty Officer.	Not applicable at this time.
XIII.49, p 17	Notification of releases	Not Established	Immediately notify OSC or Region 4 Regional Duty Officer. Within 7 days provide written report of release.	Not applicable at this time.
XXVIII. 93, pp 29-30	Additional removals	Not Established	Submit work plan within 30 days of notice by USEPA that additional removal action is needed; implement in accordance with above schedule.	Not applicable at this time.

Notes:

AOC = Administrative Settlement Agreement and Order on Consent
BPR = Biweekly Progress Report
EDWP = Excavation and Disposal Work Plan
FSP = Field Sampling Plan
HASP = Health and Safety Plan
OSC = On-Scene Coordinator
QA = Quality Assurance
QAPP = Quality Assurance Project Plan
TBD = To Be Determined
USEPA = United States Environmental Protection Agency

Attachment 2

Analytical Data

None Received During this Reporting Period