

To: Carter Williamson - EPA

From: Athan P. Tsarouhas, PE

Subject: Closure of Removal Project BF Goodrich Thomaston GA 2015

Date: November 17, 2015

Please allow this report to summarize the activities that were conducted during the September and October 2015, Waste Removal Project located at the BF Goodrich facility in Thomaston, GA.

VA Capital contracted with MCF Systems to have drums and waste disposed that were vestiges of a removal action uncovered during a demolition project a few months beforehand. From the HAZCAT identification, many of these drums were categorized and characterized. There were a total of 110 containers that were 55gal, 20 gal and 10 gal. There were several pallets of additional containers of the 5 gal size in wooden boxes or palletized onto pallets as well. These were included in the scope of the removal project and were segregated and packaged according to the hazards exhibited or tested for.

Our project scope, initially, was to make a waste determination of these drums to determine whether any of them were hazardous or nonregulated under the auspices of EPA disposal regulations, Georgia EPD Waste and any local environmental regulations. Since there were no employees available to answer questions about these wastes, we resorted to our HAZCAT results previously completed during our August 2015 visit to this location.

Upon arriving at the facility, each and every one of the 110 drums were opened and examined for empirical determinations, as well as combining the various HazCat field testing kits and field equipment testing resources at our disposal. Our initial testing has been included in this closure report. A labeling system was used numbering BFG01 through BFG 112.

In summary, there were several drums of wastes found that were Hazardous, characterized to be flammable, corrosive, flammable corrosive and aerosols. These items were characterized, profiled, manifested and properly shipped by MCF, off site to the appropriate disposal facility permitted by the EPA/ADEM/ GA EPD. The remaining items were consolidated into totes (liquids) and Cubic Yard boxes (dry solids) and composited to test for TCLP volatiles and metals. The laboratory results for these tests have also been included (See Enclosed Lab Results).

In summary, like materials were consolidated into larger containers, or in partially empty containers containing similar or chemically compatible waste materials. Materials that were hazardous that were not able to be consolidated were packaged into a large CY, 5G rated fibre box and prepared for

acceptance to the hazardous waste facility GRR. Nonregulated/Nonhazardous materials were consolidated into CY like containers and packaged DOT compatibly and shipped to the disposal facility, MCF Systems, in Ellenwood, GA. The MCF facility is able to accept solid wastes for solidification for direct landfill to Subtitle D disposal facilities. At present, they have a solid waste solidification permit issued by the local GA EPD Solid Waste Division.

Enclosed for your review are the following:

- Manifests that were completed and confirmed as accepted to their final destination
- Profiles for each of the wastes shipped
- Analytical information on the items tested by third party outside labs
- Bills of Lading for the empty drums that were disposed of and scrapped or reconditioned
- Bill of Lading for the Oil/Fuels pickup by United Environmental – removing approximately 1,000 gallons of the waste oils in partial 55 gal and 5 gallon containers

In closing, based on my thirty three years of field experience and education in this field, and the information and samples provided to me, the wastes have been characterized to the best of my ability and I stand behind the designation of all the wastes as they have been categorized. If you should have any further questions regarding the characterization of these wastes and their determination for profiling and ultimate disposition, please feel free to call me at 404-538-5469. It will be my pleasure to explain any portion of this project for those wanting more information.

Sincerely,

Athan P. Tsarouhas, PE

Project Engineer for MCF/Waste Mgt.