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November 19, 2007

Mr. Les Sims
On-Scene Coordinator
U.S. Environmental Protection Agency
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Atlanta, Georgia 30303

**Subject: Removal Action Report Revision 1
V.C. Chemical - Columbus
EPA Contract No. EP-W-05-053
Technical Direction Document (TDD) No. TNA-05-001-0036**

Dear Mr. Sims:

T N & Associates, Inc. (TN&A) Superfund Technical Assessment and Response Team (START) is submitting one copy of the Removal Action Report (RAR) for the V.C. Chemical –Columbus site located in Columbus, Muscogee County, Georgia.

Please contact me at (678) 355-5550 ext. 2243 if you any questions or comments regarding this RAR.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darius Soltes'.

Darius Soltes
START Senior Environmental Scientist

Enclosure

cc: Katrina Jones, EPA Project Officer
Darryl Walker, EPA Project Officer
Greg Kowalski, START Program Manager (w/o enclosure)
START File

REMOVAL ACTION REPORT

V. C. CHEMICAL–COLUMBUS COLUMBUS, MUSCOGEE COUNTY, GEORGIA EPA ID: GAN000409850

Revision 1

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 4
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1.0 INTRODUCTION

This report has been prepared under the provisions of Technical Direction Document (TDD) Number (No.) TNA-05-001-0036, which the U.S. Environmental Protection Agency Region 4 (EPA) assigned to the T N & Associates, Inc., (TN&A) Region 4 Superfund Technical Assessment and Response Team (START) under Contract No. EP-W-05-053. START was tasked to provide technical support to the EPA On-Scene Coordinator (OSC) during the Time Critical Removal Action (RA) involving the removal of arsenic and lead contaminated soils at the former Virginia-Carolina Chemical Fertilizer Plant Property (Site) located in Columbus, Muscogee County, Georgia. The purpose of the RA was to eliminate or minimize the threat to human health or the environment posed by the elevated levels of arsenic and lead in surface soils at the Site.

Specifically, START was tasked with the following:

- Documenting removal activities with written logbook notes and digital photographs;
- Conducting air monitoring during excavation activities;
- Screening soil for arsenic and lead concentrations from residential properties located within the designated target zone not investigated during the May 2006 Removal Site Evaluation (RSE) using a Niton[®] X-Ray Fluorescence (XRF) instrument;
- Screening soil from excavated areas for confirmation of adequate removal of contaminants using a XRF instrument;
- Performing confirmatory soil screening of excavated properties;
- Submitting 10% of the screened samples to a laboratory for total arsenic and total lead analysis; and,
- Collecting waste characterization samples from properties designated for removal action for disposal profiling.

Field samples collected during this RA were used to determine the nature and extent of contamination and the need for a RA at properties not previously investigated; confirm the effective removal of arsenic and lead contaminated soil at each parcel designated for RA; and to determine appropriate waste handling measures per the guidelines established by the EPA Office of Emergency and Remedial Response and contained within the Superfund Lead-Contaminated Residential Sites Handbook. This Removal Action Report (RAR) specifically addresses activities and procedures associated with soil screening and sampling; and air monitoring conducted at the site. All activities and procedures described in this RAR were conducted in accordance with the EPA Science and Ecosystems Support Division (ESD) Region 4 *Environmental Investigations Standard Operating Procedures Quality Assurance Manual (EISOPQAM)* dated November 2001.

The following sections provide the details of this RAR:

- Section 2–Describes the site and its history, previous investigations, and environmental setting.
- Section 3–Describes the field investigation activities and sampling.
- Section 4–Describes the soil excavation and site restoration activities.
- Section 5–Describes the disposal of investigation-derived wastes.

Figures and tables are provided as Appendices A and B, respectively. Air monitoring data is present in Appendix C. The photographic log is provided as Appendix D and the field logbook notes are provided as Appendix E.

2.0 SITE BACKGROUND

This section discusses the Site characteristics, previous investigations, and environmental setting of the area.

2.1 SITE DESCRIPTION

The Site is located at 1616 Murray Street, Columbus, Muscogee County, Georgia. The geographic coordinates as measured from the center of the Site are 32.4575 degrees North Latitude and 84.9690 degrees West Longitude (see Figure 1, Appendix A). The Site comprises approximately 22.5 acres, most of which has been redeveloped into 32 parcels of mixed use residential and commercial properties (see Figure 2, Appendix A). Currently, the three largest parcels are occupied by All American Recycling, Incorporated (AAR), a paper waste recycler. The remaining parcels are predominantly occupied by single and multi-family residences. The parcels are suspected to be contaminated with metals from historic operations at the former Virginia-Carolina Phosphate Fertilizer Plant (V.C. Chemical).

According to historical records, V.C. Chemical operated a fertilizer and sulfuric acid plant at the Site from approximately 1880 until 1957. Much of the operational history of V.C. Chemical is unknown; however, it is believed that the company manufactured a product called super-phosphate fertilizer. In the manufacturing process, phosphate was typically stripped from low-grade phosphate-rich rock using sulfuric acid processed on site. Sulfuric acid was processed from pyrite and potentially arseno-pyrite, an impurity commonly associated with sulfur ores. In the early 1900s, sulfuric acid was commonly processed utilizing the lead chamber method. In this method, sulfides, such as copper and iron pyrites

were heated to produce sulfur dioxide, leaving iron and arsenic as a by-product. The sulfur dioxide was then mixed with nitric oxide in lead-lined chambers to produce sulfuric acid.

Sulfuric acid added to finely ground low-grade phosphate-rich rock produces super-phosphate and releases fluorine as a by-product. Iron from the burning of the sulfides is the most probable source of the reddish colored soils encountered at the site. Arsenic contamination at the Site is a likely result of the burning of sulfides such as arseno-pyrite. Lead from the lead-lined acid chambers, leached by the sulfuric acid, is the most probable source of the lead contamination at the Site.

2.2 PREVIOUS INVESTIGATIONS

In May 2004, Blasland, Bouck and Lee, Inc. (BBL) investigated the Site for the Exxon Mobil Refining and Supply Company as part of the Region 4 V.C. Chemical Initiative with Exxon Mobil Corporation (Exxon Mobil). The purpose of the initiative was to inventory 40 former V.C. Chemical facilities contaminated with heavy metals from historic operations. The properties were targeted for future assessment and cleanup where warranted.

In August 2005, BBL prepared an Operations Integrity Management System (OIMS) sensitive receptor survey (SRS). The OIMS SRS summarized the findings of an investigation of historic uses of the Site and adjacent properties, current and historic title and deed holders of the property, and the environmental history related to the on-site and adjacent properties.

In December 2005, EPA SESD conducted in-situ screening for lead and arsenic at the Site using a XRF. The SESD investigation identified lead concentrations in 23 of the 26 locations screened, with levels ranging up to 2,600 parts per million (ppm). Arsenic was reported as non-detect for 22 of the 26 locations screened. The four locations where arsenic was detected contained concentrations ranging from 90 to 260 ppm.

In May 2006, START conducted a RSE investigation at the site under Contract No. EP-W-05-053, TDD No. TNA-05-003-0012. The RSE included a review of available file data and historic documentation; soil screening with a XRF; and confirmatory soil sampling for laboratory analysis. During the RSE, one industrial property, six residential properties, an elementary school playground, and a right-of-way were sampled. Analytical results related to soil samples collected from two of the residential properties indicated the presence of high concentrations of lead and arsenic in surface soils ranging up to 13,000

milligrams per kilogram (mg/kg) and 1,400 mg/kg, respectively. Also, elevated levels of lead and arsenic were detected in three surface soil samples collected along the western perimeter of the AAR facility. Based on these findings, the Site was recommended for a RA to remove the lead and arsenic contaminated soils.

2.3 ENVIRONMENTAL SETTING

The Site is bounded by residential properties to the northwest, northeast, and north. A drainage feature and the J.D. Davis Middle School are located on the eastern boundary of the Site. The south and southwest property boundaries are occupied by commercial, industrial, and residential properties. Topographic relief in the area is moderate with ground surface elevations generally varying from 250 to 360 feet (ft) above mean sea level (amsl). The Site is situated on a topographic slope dipping to the southwest at an elevation of approximately 300 ft amsl. The elevation change in the vicinity of the Site is approximately 60 ft amsl. Based on the topography of the area, surface water flow is inferred to be toward the south/southwest. Surface water generally flows into Weracoba Creek located south of the site. This creek forms part of the larger Chattahoochee River drainage basin.

3.0 SAMPLING ACTIVITIES

During this RA, START conducted field ambient air monitoring and soil collection and screening. Soil samples were collected from the following locations (Figures 3 and 4 see Appendix A):

- Residential properties located within the designated target zone (Murray Street, Shepherd Drive, and Martin Luther King, Jr. Boulevard, and the southern edge of the J.D. Davis Elementary School track) not investigated during the May 2006 RSE;
- Excavated residential properties;
- Pre-excavated soil;
- Along the Shepherd Drive right-of-way adjacent to the AAR facility; and,
- Roll-off bins staging areas located along Martin Luther King, Jr. Boulevard (pre-removal and post removal).

The following sections describe sample collection activities conducted by START in support of the RA. All sampling and field quality assurance and quality control (QA/QC) procedures for RA field activities were conducted in accordance with the EISOPQAM. Samples collected were submitted to Analytical Environmental Services (AES) located in Atlanta, Georgia for analysis. A Level II analytical data package presenting the summarized QA/QC results was provided by the laboratory.

3.1 EVALUATION SOIL SAMPLING

On August 27, 2007 and August 28, 2007, START performed screening of surface soils using a portable Niton[®] XRF instrument at those properties on the Site where access agreements were not available during the May 2006 RSE field investigation. Five-point composite surface soil samples were collected from zero to 6-inches below ground surface (bgs) from the front and back yards of eight residential properties located within the designated target zone on Murray Street and Shepherd Drive; the apartment complex located on Martin Luther King, Jr. Boulevard; and the southern edge of the J.D. Davis Elementary School track (playground). Additionally, one background soil sample was collected from an area outside the target zone where contamination was not expected to be present (see Figure 3, Appendix A). Soil samples were collected using a stainless-steel spoon or stainless steel hand auger, homogenized in a stainless-steel bowl, and placed into plastic zip-top bags. Information identifying the location, sample point, and time was inscribed on each zip-top bag. Once collected, START compressed the soil sample into the zip-top bag by folding over the excess plastic and removing as much air and space from the sample as possible. The sample bags were transported to a central point at the site where the homogenized soil sample was screened for lead and arsenic using the XRF. Ten percent (10%) of the samples collected were containerized, placed on ice, and shipped to AES for total arsenic and total lead analysis by SW846 Method 6010B to evaluate the accuracy of the XRF screening results (see Tables 1 and 2, Appendix B).

On September 27, 2007, ten in-situ XRF locations were screened at the right-of-way along Shepherd Drive adjacent to AAR. The top one-inch of soil was removed prior to using the XRF to screen the soil in-situ for arsenic and lead. In-situ XRF screening was performed every 60 ft along the fence line of AAR. XRF screening and laboratory analytical results related to this evaluation did not indicate lead or arsenic levels present in soils above the EPA-established removal action level clean-up goals (RAL) of 400 mg/kg and 40 mg/kg, respectively. Arsenic and lead concentrations for each screening location were recorded in the START field log book (see Tables 1 and 2, Appendix B).

3.2 CONFIRMATION SOIL SAMPLING

Following excavation to 1.5 ft bgs, START used the XRF to perform in-situ screening for lead and arsenic on soils from the bottom of the excavated areas. Confirmation screening was accomplished by evaluating the area and sub-dividing it into 100 square foot (ft²) grids. The intersecting corners of these sections were identified with marking paint so that the entire excavated area was represented with a series of sample points spaced approximately 10 ft apart. Numbers were used to designate the 10 ft sections along the north-south grid coordinates and letters were used to designate the 10 ft sections along the east-west grid coordinates. In instances where in-situ screening indicated levels of lead and/or arsenic to be below the RAL, the assessment for the grid was considered complete. In instances where detectable levels of lead and/or arsenic met or exceeded the RAL, further excavation at the grid was performed to a depth of 1.5 to 2.0 ft bgs. Confirmation in-situ screening results were entered electronically into the XRF instrument and documented in the field logbook (see Tables 3 and 4, Appendix B).

START collected laboratory confirmation samples from 10% of the XRF screening locations. Soil samples were collected as single-point grab samples directly below the XRF screening location. The correlation factor for lead was 95.6 % indicating a good screening accuracy with respect to the XRF unit while the correlation factor for arsenic was 63.3 % indicating lower accuracy with respect to the XRF unit (see Tables 4 and 5, Appendix B).

The low correlation factor for arsenic may be attributed to the interference of lead fluorescence when high concentrations of lead occur simultaneously with high concentrations of arsenic.

3.3 WASTE CHARACTERIZATION SOIL SAMPLING

Five-point composite soil samples were collected from zero to 1.5 ft bgs from the front and back yard of 1511 Murray Street and from the front yard of 1515 Murray Street. Samples were collected for waste characterization and disposal profiling purposes using a stainless-steel hand auger, homogenized in a stainless-steel bowl, containerized, placed on ice, and shipped to AES for analysis of Total Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) 8 metals, TCLP RCRA Herbicides, TCLP RCRA Pesticides, and TCLP nickel, copper, and zinc. Data for these analyses indicated that all target compounds were below the limits set for classification as hazardous waste (see Table 6, Appendix B).

3.4 AIR MONITORING

START conducted daily perimeter air monitoring to document the level of airborne particulates (dust) generated during the excavation activities. Three Personal Data Rams (PDR) were used to record respirable dust levels. An action level of 2.5 milligrams per cubic meter (mg/m^3) was established for the RA. One PDR was placed upwind of the excavation area and an additional PDR was placed downwind of the excavation zone at the discretion of the EPA. The third PDR was placed in the vicinity of the roll-off. During the excavation there were no sustained readings (greater than 2-3 minutes) above the action level. The EPA Emergency and Rapid Response Services (ERRS) contractor, CMC Incorporated, performed periodic soil wetting as a measure to suppress or reduce any potential risks associated with fugitive dust emissions. Concentrations of respirable dust generally ranged from $0.02 \text{ mg}/\text{m}^3$ to $0.2 \text{ mg}/\text{m}^3$. Concentrations of respirable dust approached the action level only during site cleanup activities such as sweeping sidewalks and driveways (see Appendix C)

4.0 FIELD WORK SUMMARY

The following sections describe soil excavation and Site restoration activities.

4.1 SOIL EXCAVATION

During this RA, excavation of lead and arsenic contaminated soils above the EPA-established RAL were conducted at two residential parcels. The first parcel, located at 1511 Murray Street, consisted of a two-family, brick single-story, slab foundation house situated on a 0.25 acre lot. The second parcel, located at 1515 Murray Street, consisted of a single-family, brick single-story, slab-foundation house situated on a 0.20 acre lot.

Tenants at both locations, including a small child and elderly resident, were relocated offsite during the entirety of excavation activities at each respective property.

The following summarizes cleanup activities conducted during the RA at each respective location.

1511 Murray Street

On September 12, 2007, ERRS began site clearing activities at 1511 Murray Street that included removal of trees in the excavation area and hand digging to confirm location and depth of gas and water lines.

Between September 13, 2007 and September 18, 2007, ERRS excavated arsenic and lead contaminated soil from the back yard of the property. Soil was excavated to an initial depth of 1.5 ft bgs. In-situ XRF screening was then performed on a predetermined 100 ft² grid. Areas exceeding the RAL for either lead or arsenic were excavated an additional 0.5 ft bgs to a total depth of 2 ft.

Between September 19, 2007 and September 25, 2007, ERRS performed excavation of the front yard at 1511 Murray Street. Areas of the front yard displaying visible contamination, most notably purple slag, were excavated to a depth of 2 ft. Two areas located near grids F2 and I0 were excavated to an average depth of 3.5 ft due to high concentrations of arsenic (greater than 1000 ppm) encountered below surface at these locations. During excavation activities at 1511 Murray Street, ERRS uncovered and repaired sections of two buried oxidized and leaking potable water lines. The damaged sections were replaced with copper piping.

Between September 26, 2007 and September 30, 2007, ERRS excavated the right-of-way in front of 1511 Murray Street. Right-of-way areas were screened by taking a five-point composite sample from zero to 0.5 ft bgs. Areas exceeding the RAL for either lead or arsenic were excavated in 0.5 ft bgs increments followed by in-situ XRF screening. Primarily, the soil at this location consisted of sand and fill materials. Visible staining associated with arsenic contamination was observed in soils at this location and, subsequently, excavated to a depth of 1.5 ft bgs.

1515 Murray Street

Between October 1, 2007 and October 5, 2007, ERRS performed removal activities at the front yard of 1515 Murray Street. ERRS relocated concrete lawn ornaments to pallets on the property's driveway and removed landscaping from the front yard. Excavation began on the south side of the front yard and continued toward Murray Street. With the exception of Grid K1, the majority of the front yard was excavated to a depth of 2 ft. Due to the presence of gas lines located within Grid K1, soil excavation at this location was halted at a depth of 0.5 ft. XRF screening results at this depth indicated soil contamination was below the RAL for lead and arsenic.

XRF screening performed in the immediate vicinity of a tree, located near the center of the front yard, detected arsenic concentrations exceeding the RAL. As a result, the tree was removed and underlying soils excavated to a depth of 2 ft.

An estimated total of 825 tons of lead and arsenic contaminated soils were excavated from the 1511 and 1515 Murray Street properties. The excavated soils were transferred to 57, 20-cubic yard (yd³) roll-off bins and staged onsite until approved for off site disposal. Once approved, the soils were transported off site for disposal at an approved landfill.

4.2 SITE RESTORATION ACTIVITIES

Prior to beginning restoration activities, a composite sample of the backfill soil and topsoil was collected to determine its usability for residential property backfilling and restoration. The samples were submitted to an offsite approved laboratory and analyzed for volatile organic compounds (VOC), semivolatile organic compounds (SVOC), herbicides, pesticides, polycyclic aromatic hydrocarbons (PAH), RCRA 8 metals, and pH. All analytical results related to this sampling effort were either not detected above the sample quantitation limits or well within acceptable parameters for residential usage (see Table 7, Appendix B)

Between September 26, 2007 and September 29, 2007, ERRS performed backfilling activities at 1511 Murray Street. The backfill was applied to the front and back yards of the property and graded to promote effective drainage. Approximately 0.5 ft of topsoil was applied, raked, and wetted prior to the application of sod. Additionally, ERRS replaced two trees in the front yard previously removed during site clearing operations. The sod was watered on a daily basis while removal activities continued at 1515 Murray Street.

Between October 3, 2007 and October 8, 2007, ERRS performed backfilling activities at 1515 Murray Street. The backfill was applied to the front yard of the property and graded to promote effective drainage. Approximately 0.5 ft of topsoil was applied, raked, and wetted prior to the application of sod. ERRS replaced one tree in the front yard previously removed during site clearing operations. Additionally, ERRS assisted the tenant at 1515 Murray Street with landscape restoration activities, including replacing shrubbery and relocating lawn furniture removed during the cleanup.

During this restoration effort, a total of 40 loads of clean backfill (640 yd³) and 19 loads of topsoil (304 yd³) were used to complete Site restoration activities at 1511 and 1515 Murray Street.

5.0 DISPOSAL OF REMOVAL WASTES

Investigation-Derived Wastes (IDW) (primarily consisting of disposable latex gloves, rubber over booties, zip-top bags, and aluminum foil), were bagged onsite and treated as non-hazardous waste. These items were used mainly to prevent cross-contamination and to provide personnel protection and sanitary conditions during sampling and removal activities.

Soils excavated from the backyard of 1511 Murray Street and the front yard of 1515 Murray Street were disposed as non-hazardous waste based on the TCLP analytical results for the pre-excavation soil sampled in these areas. Soils excavated from the front yard of 1511 Murray Street were treated with Triple Super Phosphate (TSP) fertilizer to reduce the potential of lead leaching from the excavated soils. Three aliquots of soil were collected from five roll-off bins. The samples were homogenized into a single composite sample and submitted to an off-site laboratory for TCLP lead and arsenic analysis. For disposal purposes, based on the analytical results, the excavated soils met or exceeded TCLP criteria for Subtitle D landfill acceptance as non-hazardous waste.

6.0 SUMMARY AND CONCLUSION

In August 2007, START performed an expanded Site Assessment Investigation at the V.C. Chemical Site located in Columbus, GA. Five-point composite soil samples were collected from the front and back yards of residential properties as well as from the grounds of a grade school located within the immediate target area. The investigation revealed that elevated concentrations of arsenic and lead were present in soils at two of the residential properties assessed. The sampling results related to the school grounds were not detected above the sample quantitation limits or well within acceptable parameters for arsenic and lead in surface soils.

During September and October 2007, removal activities were conducted to remove surface soils contaminated with elevated levels of lead and arsenic. Soils meeting or exceeding the RAL for lead and arsenic were excavated to an average depth of 1.5 feet bgs. In instances where contaminant levels still existed at or above the RAL at 1.5 feet bgs, an additional 0.5 ft of soil was removed. Utilizing a XRF soil screening instrument, in-situ screening for arsenic and lead was performed on 10-by-10 ft grids. Ten percent of the in-situ screening samples were submitted to a certified laboratory for confirmation analysis. Following the receipt of confirmatory analytical results, all excavations were backfilled with clean fill material, overlaid with topsoil and graded to promote effective drainage. ERRS completed restoration at

both properties including replacement of lawns, shrubbery, and appurtenances removed or relocated during the cleanup. All disposal profile samples related to the excavated soils passed TCLP criteria and excavated soils were disposed off site as non-hazardous waste. A total of 825 tons of lead and arsenic contaminated soils were removed and disposed during this action. A limited amount of contamination in surface soils exceeding the industrial RAL was detected during the RSE within the confines of AAR. EPA provided the facility with all pertinent documentation related to type, location, and levels of contamination identified at the property. In a meeting held between EPA and the facility's owner, the owner agreed to conduct a voluntary potentially responsible party (PRP) action, within the calendar year, to remove and dispose or otherwise eliminate the contact hazard to human health or the environment posed by the contaminated soils at the facility. The Georgia Department of Environmental Protection was notified by EPA of the facility's voluntary commitment to address the cleanup and ensure related cleanup goals meet or exceed the State's Applicable or Relevant and Appropriate Requirements (ARAR) for cleanup. No further removal action by EPA is planned or anticipated for the Site.

APPENDIX A
FIGURES

APPENDIX B
TABLES

APPENDIX C
AIR MONITORING DATA

APPENDIX D
PHOTOGRAPHIC LOG

APPENDIX E
FIELD LOGBOOK NOTES