December 21, 2009

Mr. Chris Russell
On-Scene Coordinator
Florida Outpost
U.S. Environmental Protection Agency Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street NW
Atlanta, Georgia 30303

Subject: **Incident Response Letter Report**
Lexington Avenue Mercury
Pensacola, Escambia County, Florida
TDD No.: TNA-05-001-0104
Contract No.: EP-W-05-053

Dear Mr. Russell:

The Oneida Total Integrated Enterprises (OTIE) Superfund Technical Assessment and Response Team (START) has prepared this Incident Response Letter Report detailing activities conducted in support of the U.S. Environmental Protection Agency (EPA). The scope of this incident response was to provide technical support to the EPA On-Scene Coordinator (OSC) during the Lexington Avenue Mercury emergency response in Pensacola, Escambia County, Florida. Specifically, START was tasked to conduct Incident Command Post technical support, conduct air monitoring, document site activities with photographs and written logbook notes, and prepare an Incident Response Letter Report.

This Incident Response Letter Report summarizes the incident, the response, and provides a summary of the emergency response removal action activities. A topographical map and site aerial photograph are provided as Figures 1 and 2, respectively, located in Attachment A. A photographic log of site activities is provided as Attachment B. A copy of the logbook notes for the incident are provided as Attachment C.

1220 Kennestone Circle, Suite D ● Marietta, Georgia 30066 ● 678-355-5550 ● FAX 678-355-5545

Physical Location

Figure 1 located in Attachment A illustrates the location of the site and the surrounding areas. The shed in which the mercury was discovered is behind the residence located at 740 Lexington Avenue, Pensacola, Escambia County, Florida. The geographic coordinates are Latitude 30.5566470° North and Longitude -87.2600800° West.

Site Background

On December 10, 2009, the Florida Department of Environmental Protection (FDEP) Bureau of Emergency Response was notified of a residential dwelling with a shed that allegedly contained three 10-pound containers of mercury. FDEP responded and secured the storage shed.

On December 14, 2009, FDEP requested EPA's assistance in conducting an assessment of the site. The EPA Phone Duty Officer dispatched OSC Russell to conduct the assessment which revealed that five 10-pound containers of mercury were improperly stored in the shed and that one of the containers was found to be leaking mercury directly onto the wood floor of the shed. Based on the findings of the assessment, OSC Russell determined that an emergency removal action was warranted. As a result of the mercury spill, EPA tasked START to conduct screening for mercury concentrations using a Lumex® Mercury Vapor Analyzer (MVA), and provide photographic and written documentation of the response activities. EPA retained the Emergency Response and Rapid Removal Services (ERRS) contractor, SWS First Response (SWS), to conduct remediation activities associated with the mercury spill.

On December 15, 2009, at 1437 Eastern Standard Time (EST) the EPA Phone Duty Officer called in the incident to OTIE START. START deployed and was ready to begin site activities at 0730 Central Standard Time (CST) on December 16, 2009.

Containment and Removal Activities

From December 16, 2009 to December 18, 2009, EPA conducted assessment and removal activities at the Lexington Avenue Mercury site, with support from START and SWS personnel. EPA set up the Incident Command Post in the front yard of the site. The OSC screened the residence and travel trailer on site prior to START arriving and stated that both the residence and trailer did not have readings higher than 37 nanograms per cubic meter (ng/m^3). However, readings collected in the shed using the Lumex® MVA

ranged from 1,000 ng/m^3 to over 100,000 ng/m^3. The site-specific action level was established at 10,000 ng/m^3 by EPA based on Agency for Toxic Substances and Disease Registry (ATDSR) guidelines. The level used for the incident was based on several factors including the fact that the shed was not being used as a habitable dwelling, and there were no children, pregnant women, or elderly people residing in the building.

Removal actions at the site included the segregation and removal of contaminated items, invasive measures including the removal of flooring and siding, heating/venting activities, and continual assessments of air quality. SWS was instructed by the EPA OSC to remove and bag the items found on the workbench due to elevated mercury readings identified inside the shed. SWS was also instructed to remove approximately half of the floor boards and approximately two thirds of the exterior wall boards on the east side of the shed. Once the impacted building materials were removed from the shed, SWS used a solution of water mixed with cupric sulfate and sodium thiosulfate to bind up the free mercury. The mixture was sprayed on the 2 inch by 6 inch (2x6) wood supports, 4 inch by 6 inch (4x6) beam, and the soil beneath the shed. Magnesium sulfate, also known as Epsom salt, was also used on the remaining floor boards and the soil beneath the shed to further bind up any remaining mercury. SWS removed approximately five 55-gallon drums of mercury-contaminated soil and Mondo grass (known as monkey grass), and filled nine polyurethane bags with miscellaneous items consisting primarily of cardboard boxes and books that had been in contact with the spilled mercury on the workbench. SWS handled the disposal of the all removed items, soil, and building materials. Laboratory analytical results of waste disposal samples will be submitted under separate cover to the EPA by SWS.

Heating/venting procedures were performed on the shed prior to confirmation screening. Confirmation screening was conducted in the shed over a period of 6.5 hours. With the doors shut and polyurethane plastic over the 2 foot by 3 foot opening in the back wall, the air space within the shed was allowed to settle for 30 minutes then the area was heated for 15 minutes using a space heater. The air space within the shed was then again allowed to settle for 15 minutes prior to each set of confirmation screenings using the Lumex® MVA. The ambient temperature inside the shed was maintained in a range of 70-75 degrees Fahrenheit throughout the confirmation screening process. Five locations in the shed (near the four corners and center of the shed) were established as confirmation screening locations. A total of six sets of screenings were conducted over the 6.5 hour confirmation screening process. A 30-second average reading was collected using the Lumex® MVA at each of the five designated screening locations and those five were then averaged. An overall average was calculated from the six sets of readings. The

overall average of the confirmation screening was 1,399 ng/m^3, which was well below the site specific action level of 10,000 ng/m^3. The confirmation screening readings are presented in Attachment C. Upon completion of the confirmation screening, OTIE START demobilized from the site at approximately 1600 CST on December 18, 2009.

If you have any questions or comments regarding this Letter Report or require any additional information, please contact myself or Mr. Greg Kowalski, START Program Manager, at 678-355-5550 ext. 5701.

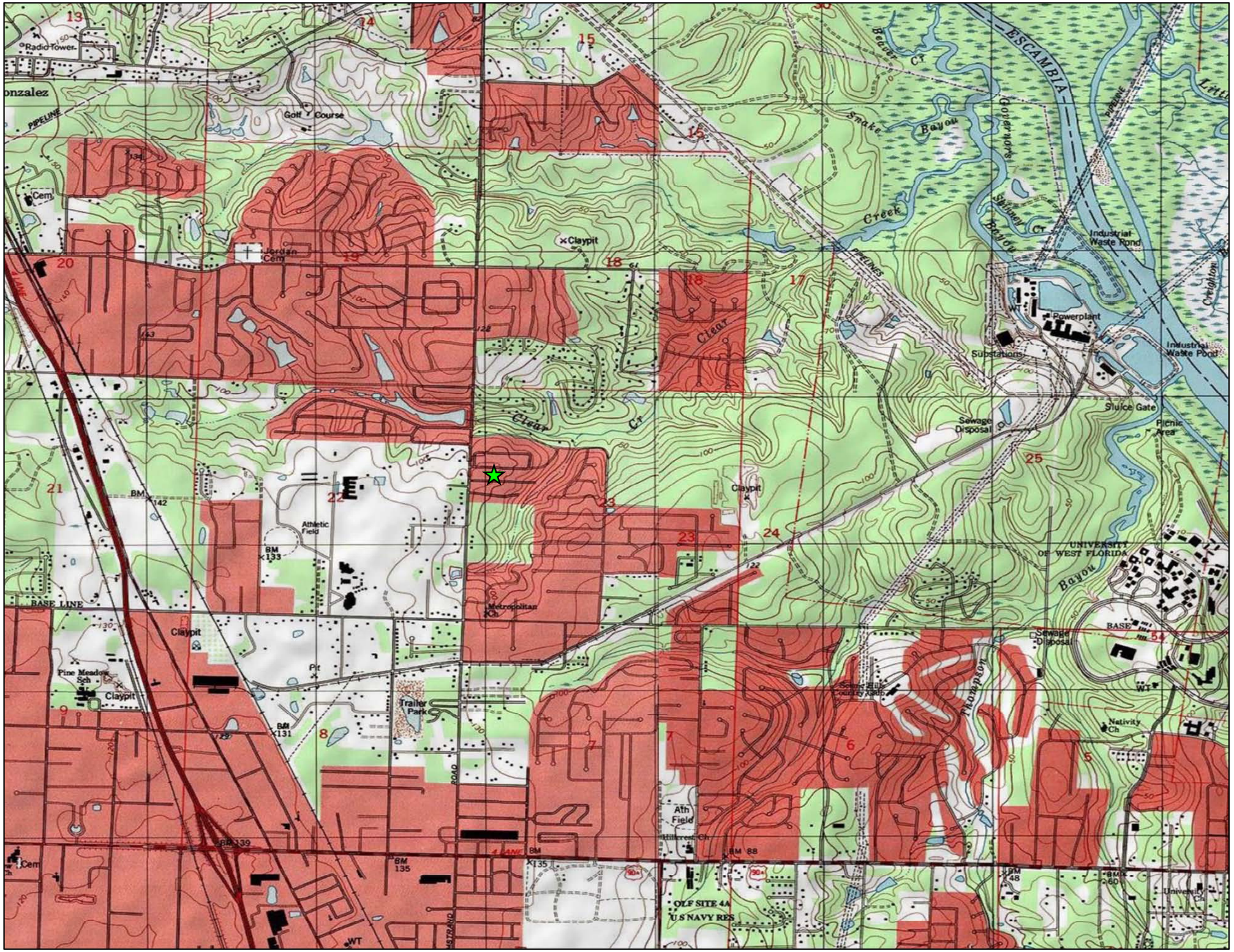
Sincerely,

Ryan C. Stubbs
OTIE START Project Manager

CC: Katrina Jones, EPA Project Officer
Darryl Walker, Project Officer, USEPA (w/o enclosure)
Greg Kowalski, TN&A START Program Manager
OTIE START File

Enclosures

ATTACHMENT A
FIGURES



Legend

Site Location

N

Miles

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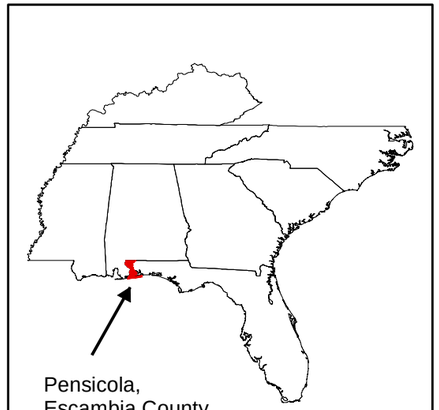


United States Environmental Protection Agency

LEXINGTON AVENUE MERCURY
PENSACOLA, ESCAMBIA COUNTY, FL

TDD No: TNA-05-001-0104

FIGURE 1
TOPOGRAPHICAL MAP

OTIE
Oneida Total Integrated Enterprises

Disclaimer: This map is intended for visual orientation use only. In no way is this map to be used for precise locational use.

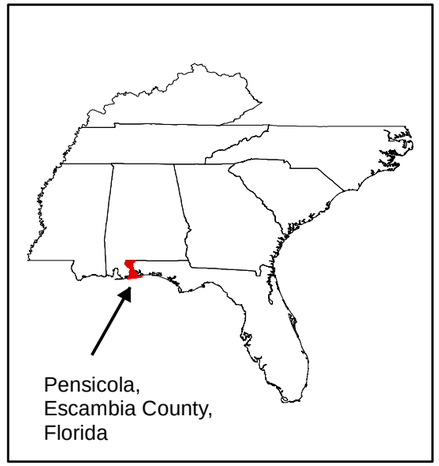
Legend

Site Boundary

N

Feet

0 50 100 200



United States Environmental Protection Agency

LEXINGTON AVENUE MERCURY
PENSACOLA, ESCAMBIA COUNTY, FLORIDA
TDD No: TNA-05-001-0104

FIGURE 2
SITE LOCATION

OTIE
Oneida Total Integrated Enterprises

...\GIS Workspace\Pensicola Mercury Responce

ATTACHMENT B
PHOTOGRAPHIC LOG

Official Photograph No. 1

Site Name:	Lexington Avenue Mercury	**Date:**	December 16, 2009
Location:	Pensacola, Escambia County, FL	**TDD No:**	TNA-05-001-0104
Photographer:	Ryan Stubbs, START		
Subject:	View of the residence on the site.		

Official Photograph No. 2

Site Name:	Lexington Avenue Mercury	**Date:**	December 16, 2009
Location:	Pensacola, Escambia County, FL	**TDD No:**	TNA-05-001-0104
Photographer:	Ryan Stubbs, START		
Subject:	View of the shed where the mercury was discovered.		

Official Photograph No. 3

Site Name:	Lexington Avenue Mercury	**Date:**	December 16, 2009
Location:	Pensacola, Escambia County, FL	**TDD No:**	TNA-05-001-0104
Photographer:	Ryan Stubbs, START		
Subject:	View of items removed from the shed.		

Official Photograph No. 4

Site Name:	Lexington Avenue Mercury	**Date:**	December 16, 2009
Location:	Pensacola, Escambia County, FL	**TDD No:**	TNA-05-001-0104
Photographer:	Ryan Stubbs, START		
Subject:	View of SWS removing floor boards from the shed.		

Official Photograph No. 5

Site Name:	Lexington Avenue Mercury	**Date:**	December 17, 2009
Location:	Pensacola, Escambia County, FL	**TDD No:**	TNA-05-001-0104
Photographer:	Ryan Stubbs, START		
Subject:	View of Epsom salt on the soil beneath the shed.		

Official Photograph No. 6

Site Name:	Lexington Avenue Mercury	**Date:**	December 17, 2009
Location:	Pensacola, Escambia County, FL	**TDD No:**	TNA-05-001-0104
Photographer:	Ryan Stubbs, START		
Subject:	View of newly installed floor boards in the shed.		

Official Photograph No. 7

Site Name:	Lexington Avenue Mercury	**Date:**	December 17, 2009
Location:	Pensacola, Escambia County, FL	**TDD No:**	TNA-05-001-0104
Photographer:	SWS		
Subject:	View of START and OSC screening the shed for mercury vapors.		

Official Photograph No. 8

Site Name:	Lexington Avenue Mercury	**Date:**	December 18, 2009
Location:	Pensacola, Escambia County, FL	**TDD No:**	TNA-05-001-0104
Photographer:	Ryan Stubbs, START		
Subject:	View of shed following confirmation screening and restoration.		

ATTACHMENT C
LOGBOOK NOTES

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Pensacola Mercury Response
Dec. 2009

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ALL-WEATHER WRITING PAPER

Name Ryan Stubbs
START-OTIE

Address 740 Lexington Ave.
Pensacola, FL

Phone

Lexington Ave.

Project ~~Pensacola~~ Mercury Response
OSC - Chris Russell

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CONTENTS

PAGE	REFERENCE	DATE

12/15/09

1700 START Stubbs deploying to Penasacola, FL for Mercury Response at 740 Lexington Ave. OSC-Chris Russell responding and will meet START on site at 0800 CST.

2300 EST - START Stubbs arrived at hotel in Pensacola, FL. OSC-Russell now wants to meet on site at 0730 CST. End of day. — RS

12/15/09

12/16/09

0700 - Weather: 48°F + cloudy

0720 - START Stubbs arrived on site at 740 Lexington Road. OSC Russell already on site + screening shed. OSC-Russell said the highest readings were outside near the drip line of the shed (~43,000 ng/m³). Inside max was approx. 6,000 ng/m³.

0745 ERRS on site (Eagle SWS) Harry (~~Supervisor~~) RS, Mike + Steve Haas — RS

RS

0750 Showed ERRS the work area and game plan. Went over Health + Safety. — RS

0800 ERRS setting up to begin bagging items on the workbench. Metal (non absorbing) items they will move to the opposite side of the shed.

Scale: 1 square=

Scale: 1 square=

12/16/09

0830 – Fourth SWS person on site. ERRS removing workbench and have bagged items on poly outside of the shed.

0850 ERRS – Mike + START Stubbs discussing how much flooring to remove. One sheet wide down to the window will be removed + replaced. Same with the exterior wall one sheet from bottom down to window will be removed + replaced. RS

0935 ~~ERRS~~ RS SWS – Harry done vacuuming the floor + beginning to remove floorboards. RS
START took readings with Lumex in breathing zone and got up to 4,600 ng/m³. Got 750,000 on the exterior where mercury exited the shed into the monkey grass.

1030 START + OSC – Russell screening bags with Lumex.

12/16/09

1045 Screening bags:
Bag 1 – > 50,000 ng/m³
Bag 2 – 23,000
Bag 3 – ~~250,000~~ RS 38,000
Bag 4 – 47,000
Bag 5 – 43,000
Bag 6 – 46,000
Bag 7 – 40,000
Bag 8 – 29,100
Bag 9 – 35,000
RS

1115 ~~ERRS~~ SWS RS digging up monkey grass and drumming the grass, soil + cinder blocks. RS

1150 Screening Bag 1 second time and reduced to 22,000 ng/m³. One drum of grass + soil is 44,000 ng/m³. RS

1200 Screened inside shed and got up to 45,000 ng/m³. OSC – Russell instructed SWS to Merc Vac visible Hg on the exterior of the shed down low and then remove the facia board and then heat the shed.

12/16/09

→ Latenote: OSC-Russell screened the house + trailer yesterday and had no readings above 37 ng/m³. RS

1230 SWS cutting more of the floorboard near where it meets the toeplate. RS

1300 SWS using some Rustoleum paint that was in the shed to paint over the wood that is showing readings up to 45,000 ng/m³ still. After that SWS will put poly on the floor + one window to seal up the inside of the shed to screen that area.

1330 OSC-Russell being interviewed.

1340 START screened the inside of the shed with it closed and got a range of 6,800–12,000 in the breathing zone. Doors open 6,500–8,000 ng/m3 this is well above 1,000 ng/m³.

12/16/09

1355 SWS pulling poly up from floor and going to heat the wood framing up and will then spray the wood framing of the shed with a mercury inhibiting solution.

* Latenote: OSC-Russell was interviewed by someone from Fox News 10! RS

1500 START screened inside of shed in breathing zone after SWS applied solution (copper sulfate) to the wood framing and then applied heat with space heaters. Space had been heating for about an hour. Readings in breathing zone 1,800–2,000 ng/m³ which is much lower. RS

1525 START screened wood framing with highest readings from earlier and have ~~read~~ reduced highest reading on wood now 20,000 ng/m³.

Scale: 1 square=

12/16/09

1525 SWS going to spray more Copper Sulfate solution on the impacted wood framing of the shed and will heat again and then rescreen.

1540 SWS done applying more solution + heating again.

1615 START screened breathing zones in shed and got a range of 1,000-1,800 ng/m³. These readings were with doors open and heat on. RS

1620 Screened hot spots on wood framing and got a max of 6,000 ng/m³. This was with heat off. SWS putting poly back on the floor and open wall to prep for another screening to determine if it is suitable to put the new floorboards and exterior wall boards on.

12/16/09

1730 START + OSC-Russell screened inside the shed in the breathing zone with two Lumex units and got readings up to 17,000 ng/m³.

2100 End of day. SWS cut out 2"x4" studs + part of the 4"x6" beam. Dug out more soil + still get readings on the wood of 7,000-14,000 ng/m³. Will resume activities tomorrow at 0730 CST.

* Laterate OSC-Russell estimates approx. 30 lbs. of Mercury was recovered from the shed.

12/17/09

0700 Weather: 48°F + cloudy
0720 START Stubbs on site. OSC-Russell and SWS already on site ready to resume activities.
0730 START + OSC screened hot zone of shed and all readings were below 4,000 ng/m³ except one hot spot of 28,000 that was most likely do to the poly drop sheet + brush that was used yesterday. More Cupric Sulfate solution which was earlier referred to as Copper Sulfate was sprayed on the wood framing. Sodium Thiosulfate is also in the solution and gives the solution as blackish tint. Epsom Salt (photo of bag) was also sprinkled on top of the soil to bind up to remaining Hg.
0745 ~~START~~ RS Heating shed. RS

12/17/09

* Latenote: OSC-Russell obtained a site specific screening level of 10,000 ng/m³ per ATSDR due to the resident only being in the residence until the coming Saturday and will be gone for 5 weeks in addition there are no children in the residence on the property. Also no pregnant women or elderly people reside in the residence. Furthermore access ~~the~~ RS to the shed is limited due to private property and the shed will be locked. RS
0822 ~~Screened shed~~ RS Turned heat off and going to let the shed settle for 30 minutes and then screen it.
0830 ~~Yvonne~~ RS from landfill on site to look over what will be disposing of. She would like a grab sample from each soil drum for Hg TCLP. OSC-Russell said he will just manifest it.

Devon

12/17/09

0840 START documenting items in bags to be disposed of:
- Bag 1 - Empty cardboard boxes/book (Photos: 1510-1511)
- Bag 2 - Primarily books/boxes
  - photos: 1512 + 1513
- Bag 3 - Laundry basket/box/tubing/spray can
  - photos: 1514 + 1515
- Bag 4 - cardboard boxes
  - photos: 1516 + 1517
- Bag 5 - cardboard boxes/rollodex/binder
  - photos: 1518 + 1519
- Bag 6 - Caulk gun/welder mask/coffe mug/cardboard/books/glass item/towels
  - photos: 1520 + 1521
- Bag 7 - Cardboard boxes/plastic bag ~~~~ RS
  - photos: 1522 + 1523
- Bag 8 - Books ~~~~ RS
  - photos: 1524 + 1525
- Bag 9 - Rags/box
  - photo: 1526

12/17/09

0850 SWS loading waste boards from the shed onto their stake truck. ~~~~ RS

0930 START + OSC screened the shed and discovered a file cabinet that had some visible mercury beads and top of it. SWS removed the file cabinet from the shed and are going to ~~mer~~ vac the floor around where the file cabinet was sitting. ~~~~ RS

1015 SWS about to begin Merc vaccing. OSC gained some info regarding the ownership of the property. The caretaker of the property stated that Mrs. + Mr. Adams owned the property and Mr. Williams is Mr. Adams stepson.

1035 Child observed through window in residence across the road from the site ~~~~ RS

12/17/09

1050 START Stubbs headed to hotel to get package (Lumex filters, PPE) that was sent by GZ.

1154 START back on site. SWS installed new plywood floor boards in the shed.

1230 Lunch RS

1300 Resuming activities, SWS putting wall boards on shed.

1310 Turned off heaters in shed and allowing shed to cool off for another screening.

1320 SWS nailing down floorboards.

1350 Shut the doors to shed and letting it set before screening. All the ext. wall boards and floor boards have been replaced.

1405 START + OSC changed filters on Lumex (both units: one EPA unit + SWS's unit). Units "on stream" + on charge.

1425 Baseline test on Lumex Unit #834, R% = 11.

1425 Weather: Cold (≈45°F) + raining.

12/17/09

1430 START + OSC begin confirmation screening and got a 30 second in the center of the shed in the breathing zone of 12,090 ng/m³.

1445 2 Florida DEP personell on-site. SWS refilling heaters with fuel and going to heat and vent the shed. RS

1450 Heaters back on in the shed.

1505 START Stubbs + OSC following FDEP (Bruce McNutt + Dave Staples) to the jail where Kenny Williams (site: property owner) is incarcerated.

* Latenote: For screening purposes for confirmation the doors on the shed were shut and there is a 2'x3' open hole on the back wall of the shed. This open hole was covered with poly (visqueen) during confirmation screening.

12/17/09

I, Kenneth Williams hereby understand that the shed located at 740 Lexington Road, Pensacola, FL was contaminated with elemental mercury. I further understand that the USEPA took invasive removal actions to reduce the public health and environmental threats related ~~this~~ to the release of elemental mercury. Although, all free elemental mercury has been removed I have been advised by OSC Russell to insure that while humans are present in the shed all windows and doors should be opened and kept open while humans are present.

sign: Kenneth Williams date: 12/17/09

print: Kenneth Williams date: 12/17/09

Scale: 1 square=

12/17/09

1530 START, OSC, FDEP meet with property owner (Kenny Williams) in jail to inform him of the activities taken on the shed to remove the elemental mercury. Informed Mr. Williams that 9 bags of cardboard + books will be disposed of. February 5, 2010 is Mr. William's out date from the jail. OSC Russell asked Mr. Williams to call so he can come and screen the shed. Panhandle Fabricators went out of business in 2004. Gary P. Adams Cary passed away in 2004 + Mrs. Marie Adams 2007. Instrumentation + Heating/Cooling was what Mr. Cary Adams did at Panhandle Fabricators. Kenny Williams is 57 years old. RS

RS

Scale: 1 square=

12/17/09

1600 START + OSC headed back to the site. RS

1630 Screened shed by breaking it into thirds and took 30 second averages and got an average of 10,332 ng/m³.

1640 Heating/venting again.

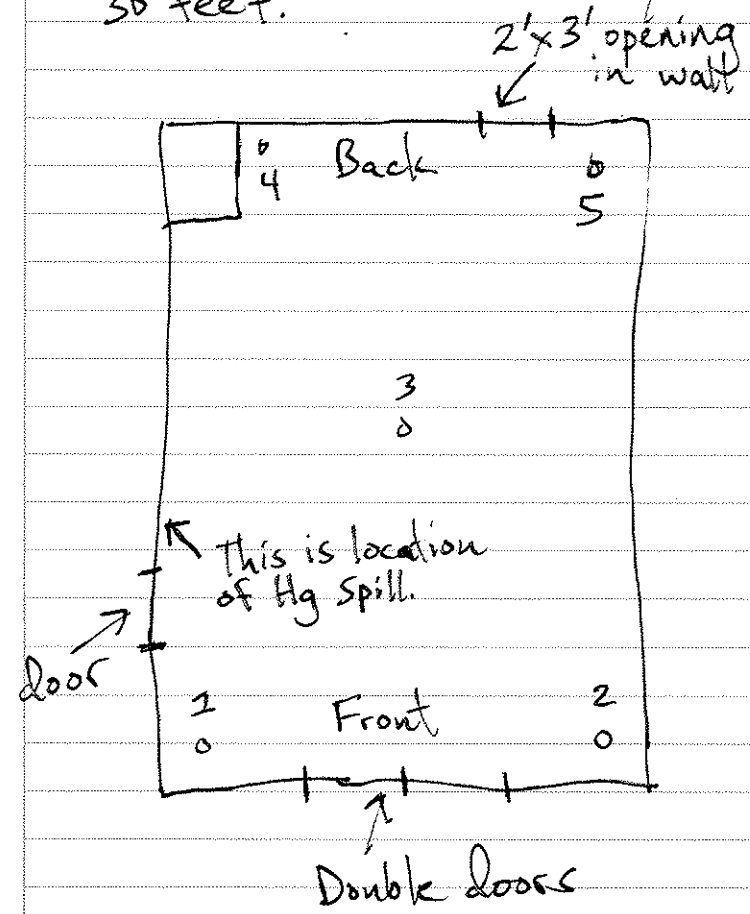
1700 SWS off site. RS

1755 Turned off heaters + venting shed. We will vent for 30 minutes + then shut the doors. RS

1830 Shut the doors on the shed and waiting an hour before screening. We will screen at 5 locations in the shed taking 30 second averages at each location and then averaging those 5 - 30 sec. averages. See sketch on page 19 showing the 5 locations. Near the four corners and in the center. RS

12/17/09 Sketch of Shed

Shed is approx. 15 feet by 30 feet.



* Numbers 1-5 show sampling points.

12/17/09

* Latenote: SWS transported 5 drums of soil/monkey grass, 9 bags of cardboard/books/etc and sheets of plywood off site today and will be taken to the Pardeo landfill. the bags + wood that was removed will be taken to the landfill and a composite soil sample will be collected by SWS and analyzed for Mercury TCLP.

1930 Screening shed at 74°F
(1) 5,600 ng/m3
(2) 4,900
(3) 5,600 Avg. = 7,978
(4) 17,900
(5) 11,490

1945 Turned one heater back on. Procedure will be heat for 10 mins and allow to settle for 50 minutes and then screen again. —RS

12/17/09

2045 2nd set of confirmation screening -74°F
(1) 6,800 ng/m3
(2) 7,135
(3) 6,663
(4) 31,000
(5) 10,300

2200 START Stubbs went to WalMart to purchase epsom salt, mops, mop bucket + fans. —RS

2245 START back on site. START + OSC ~~to~~ placed fans in the windows, applied epsom salt on the wood floor (total of 24 pounds of epsom salt) + have heaters running. —RS

0145 End of day. Will resume activities at 0800.

12/17/09

12/18/09

0730 Weather: 46°F & light rain

0810 START Stubbs on site
SWS on site. ——— RS

* Latenote: SWS sealed up the shed at 0745. ——— RS

0820 Entered shed just to do a pre screen and got a max of 4,600 ng/m³ back in location 4. ——— RS

0833 SWS turning of heaters and directing them at the exterior walls so not to disturb the air inside the shed. Temp. inside shed is 53°F. ——— RS

0845 OSC Russell sprayed Copper Sulfate / Solium thiosulfate solution on the floor boards across the back third of the shed. ——— RS

0935 START Turned off heat & allowing shed to rest for 10 minutes then we will begin confirmation screening again.

Scale: 1 square=

12/18/09

0945 1st set of conf. screening @ 70° F
① 814 ng/m³
② 839
③ 1235 Avg. = 1,217
④ 1485
⑤ 1713

1045 2nd set on conf. screening @ 71°F
1045 ——— RS
① 719 ng/m³
② 840
③ 965 Avg. = 1,012
④ 1253
⑤ 1284

* Latenote: Procedure is after screening let shed set for 30 minutes, heat 15 minutes, let stand for 15 minutes then screen again. This is the procedure established for confirmation screening. Per Bob Safay (ATSDR) said the priority is heating over venting. ——— RS
——— RS

Scale: 1 square=

12/18/09

1145 RS 3rd set of conf. screening @ 71°F

1200 ① 900 ng/m³
② 1003
③ 1170 Avg. = 1,223
④ 1516
⑤ 1525

1210 All readings from first 3 sets were taken from the EPA Lumex unit. All following sets of confirmation readings will be taken from the SWS owned Lumex unit (ID # 670). RS

1215 Per OSC Russell: A one page letter report is requested and upload 5 photos to the site's EPAOSC.net page.

1300 4th set of conf. screening @ 74°F

① 1200 ng/m³
② 1000
③ 1200 Avg. = 1,440
④ 1800
⑤ 2000

RS

12/18/09

1415 5th set of conf. screening @ 75°F

① 1200 ng/m³
② 1300
③ 1600 Avg. = 1,840
④ 2400
⑤ 2700

* Late note: Confirmation screening was conducted with the permanently open window sealed shut with visqueen. When leaving the site the perm. open window was left unsealed. RS

RS

1515 6th set of conf. screening @ 74°F

① 1300 ng/m³
② 1100
③ 1500 Avg. = 1,660
④ 2100
⑤ 2300

RS

Overall average = 1,399 ng/m³

12/18/09

1530 START Stubbs left a note and the keys to the locks on the shed doors duct taped to the back door on the house. RS

1549 START demoping back to Marietta, GA.

1800 START arrived in Greenville, AL. End of day and will finish demobe, tomorrow as I am too drowsy to finish the drive.

12/18/09

12/19/09

0715 ~~ETS~~ RS (CST) START Stubbs departing Greenville, AL for Marietta, GA. RS

1135 Arrived at OTIE in Marietta, GA and unloaded.

1200 (EST) Finished unloading.

1230 Returned vehicle to Enterprise. End of Day

12/19/09

End of
Logbook
12/21/09
R. Stubbs

Scale: 1 square=_____

Scale: 1 square=_____