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
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 (ft²) 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 online 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)
FIGURE 1
SITE LOCATION

United States Environmental Protection Agency

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

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

LOGBOOK NOTES

(10 Pages)
December 3, 2009

Weather: Cloudy High of 47°F
Scope: Site investigation at Liberty Fibers
09:25 Start prep on site.

09:45 EPA Peggy Gaughan and Tim Feedback and TDEC Lee Barron (865-898-9204) discussed the site and its history. There is the potential for asbestos abatement waste from outside projects being dumped at this facility. Former facility may have been split into 3 groups with different owners.

10:00 EPA, TDEC and STAFF 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.

10:25 EPA, TDEC and STAFF entered the site and proceeded to a staging area to dress out in level C PPE to conducting walk-through.

Staging area located at W 85.97473° W 83.94653°. Each team member wore a full-face respirator with P100 filters, 2 tyvek suits, rubber boots, and nitrile gloves.
1045 EPA, TDEC and STAP 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 felt was 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. Unsure because on paper ductwork 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 terra-cotta exterior held in 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 STAP completed the site walk through.

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

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

1400 OSC Gaughan, EPA Frederick, and STAP re-visited the site to conduct a walk through of visual points of interest.
December 3, 2009

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

1536 EPA and start completed drive through of the facility. EPA and start discussed the finding and possible costs associated with the clean up.

1555 start EPA off-site.

TDEC Contacts
Lee Barron    LEE.BARCON@TN.GOV
(c) 615-594-5482  (c) 615-998-9204
Paula Plant   PAULA.PLANT@TN.GOV
(c) 615-594-5474

EPA Contacts
OSC Perry Gantham   GANTHAM.PERRY@EPA.GOV
(c) 404-562-8877  (c) 404-909-2930
Tim Frederick   (c) 404-562-8896

December 4, 2009

weather: cloudy high of 44°F
Scope: site investigation at Liberty Fibers.

0900 start pay met with OSC Gantham 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 pay contacted TDEC staff 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 asked Start Pay to put together a cost estimate for the removal of the following:

- Asbestos pile west of the Powell Bridge (~7 tons)
- ACM from this area/beneath
- 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 Powell Bridge to asbestos pile
- TSI from elevated pipe run stretching from burial mounds to the building east of the mounds.

1005 OSC Gantham and Start Pay arrived on site to speak to Mr. Sawyer (property source).
December 4, 2009

1015 OSC Goughan and Scott Perry 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 Lowlands Recyling and Lowlands Metal Processing Inc. Owners collected materials for dismantling and recycling.

1020 Arrived at building with a sign that said "Power Mech Shop - Rayen Stables". All windows and doors were covered with polyethylene sheeting. Scott Perry and OSC Goughan looked inside the building through a hole cut in the poly sheet. 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 Power Building. New soil near the flue. M. Sawyer said, "Approx. 8 years ago, BASF remediated the soil of coal dust. Coal had been previously stored there for use of the Power Bldg. BASF remediated about 2.99 acres. Remediation may have been performed by AECOIS.

BASF won the contract for landfill at the northeast corner of the facility and a

December 4, 2009

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

PROCEED 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 polystyrene synthetic steel.
- The facility northeast of the southeast 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 LS tanks located at the southwest corner of the facility. Tanks were removed around Spring 2009 because of concern for explosion and cost to repair scrap. M. Sawyer said he discussed it in EPA attorney Joan Redleaf Dunbar's office.

Mr. Sawyer said that approximately 10-20 PCB transformers were sold to Booker
December 4, 2009

1035 - Ironworks. Four were left on a truck, 3 in the pump house, 1 on line at the Admin Bldg. with 1 square next to it, and 2 in storage.

- BBLK inactive site manager is Charlie Waite (973) 245-6555.
- Mike Bell is supposedly coordinating mineral 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 capsules stored in 3 totes at the northeast corner of the beamed area. Two totes were filled with PCB oil and 4 totes were empty at the south end of the beamed area. Two sets in the northeast corner have moisture in the sampler (a 50 ft²). Approx. 200 ft² of sawdust under transformers and tares was visibly wet. Northwest corner has 2 pales and tares with mercury contaminated soil and equipment. At the south end of the Bldg. there were empty waste oil tares. At the north end of the

December 4, 2009

1120 Bldg. there were two drums of acid marked "Corrosive" on pallets with a 5 gallon metal can of refrigerant oil sitting on top. Visible corrosion around drums at top and base of can. At the northeast corner of the Bldg. were possibly 5 drums of cooling water treatment solution. All drums were 55 gallon. The elevated piping in this building appeared to have asbestos containing Tiss.

1145 Arrived at the analyses mounds at near the clarifier on the west side of the facility. Mounds were located around the demolished clarifier.

1150 Arrived at west neutralization tanks in basins. North and south basins may contain waste from heavy neutralization processes. LEA containment area is located northeast of basins.

1:55 Mr. Sawyer informed OSC Gaughan that since the end of 2007, he has disposed of 30 to 40 roll offs of asbestos waste to State approved landfills (Rambo Landfill, TDEC). Pima Plant stopped his disposal in May/June 2008. Mr. Sawyer said he has not disposed of any transformers since taking
DECEMBER 10, 2009

155% ownership. He had not disposed of any oil except for straight motor oil. OSC Graham informed Mr. Sawyer that TDSC was concerned that asbestos waste was being dumped on his property from the scenc metal salvaging operations at the major plant.

1200 Mr. Sawyer informed OSC Graham that he had the crew to handle the asbestos waste on site but didn’t have the financial means to remove the asbestos on the pipes.

1215 OSC Graham and Start Pang completed the site walk through with Mr. Sawyer.

1230 OSC Graham and Start Pang discussed the site walk through.

1240 EPA and Start departed the site.

1420 Start Pang arrived on site to speak with TDSC about the location of possible asbesto transformers on site.

1800 Start Pang mobilized from TVA Kingston site to Dalton, CA office.

JANUARY 18, 2010

WEATHER: Mostly Sunny, High of 55°F.
SCOPE: Mobilization and Site Walk Through.

0730 Start Pang departed from home to mobilize to Liberty Fibers.
0800 Start Pang picked up Start Jones and mobilized to Liberty Fibers.
1155 Start Pang 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 Pang briefed him on site activities.

1215 Start Tolley arrived at the site.
1215 Team entered the facility.
1245 Start Pang conducted safety meeting.
1300 Start Jones and Tolley left for lunch.
1330 Start Pang and Cory Williamson set out area pumps.

1324 Placed low volume pump on van bumper to see if van will stir up any asbestos while setting out area pumps. (LF-PIAA-06)
1336 Stopped next to CS2 vault to place 1st area pump along west fence line. (LF-PIAA-01)
### January 19, 2010

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<td>Sample LF-AS-006</td>
<td>SE</td>
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<td>P100017</td>
<td>1045</td>
<td>Sample LF-AS-007</td>
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<tr>
<td>P100018</td>
<td>1050</td>
<td>Sample LF-AS-008</td>
<td>NA</td>
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<tr>
<td>P100019</td>
<td>1057</td>
<td>Sample LF-AS-009</td>
<td>NA</td>
<td></td>
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<tr>
<td>P100020</td>
<td>1102</td>
<td>Sample LF-AS-010</td>
<td>SE</td>
<td></td>
</tr>
</tbody>
</table>
**PhotoLog**

December 3, 2009

**Photo** | **Time** | **Location** |
--- | --- | --- |
Edna 2049 | 11:51 | Centerline in debris pile, NE PP |
2896 | 14:08 | E. side of Power mesh, Raymon Single Bilg, SE SW |
2897 | 14:24 | E. side of Power mesh, Raymon Single Bilg, NE NW |
2898 | 11:40 | NE |
2899 | 11:40 | W. side of Power mesh, Raymon Single Bilg, NE |
2900 | 11:44 | NE |
2900 | 11:41 | NE |
2902 | 1:20 | W. side of Power mesh, Raymon Single Bilg, SE |
2903 | 14:34 | Mudbox Pres-Cast TSI, SE |
2904 | 14:25 | Deteriorated mudbox TSI, SE |
2905 | 14:26 | Potential ACM in pile, SE |
2906 | 14:29 | E |
2907 | 14:32 | Demo Pipe Run w/Exposed TSI, E |
2908 | 14:32 | E |
2909 | 14:37 | Storage Tank w/Possible ACM, SW |
2910 | 14:39 | Recently Disturbed Soil, NW |
2911 | 14:39 | Storage Tank w/Possible ACM, NW |
2912 | 14:40 | Deteriorated TSI at base of tank, SW |
2913 | 14:41 | S |
2914 | 14:42 | SE |
2915 | 14:43 | S |
2916 | 14:44 | Deteriorated TSI on tank, S |
2917 | 15:00 | Debris with Storage Tanks, W

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**Sample Sites**

1. Several PCB / SARA Soil (3 cm)
2. 1 PCB Water Sample in ditch
3. 1 Water Sample for VOLS (CS3)
4. 1 Soil Sample for VOLS (CS3)

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**Samples**

- LF-SS-01 - Soil for VOLS (CS3) 2 en 2 oz
- LF-SW-01 - SW for PCBs 2 en 1 L Amber
- LF-SS-02 - Soil for PCBs 1 en 8 oz
- LF-ACM-01 - Suspect ACM 1 en 2 oz
- LF-PW-01, 03: PCB Wipes (100 cm²) 3 en 4 cm² Wipe w/Hexane
- LF-PS-01 - PCB Sandust 1 en 8 oz
- LF-PL-01 - PCB Oil 1 en 8 oz

9 Total (incl. 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.
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.
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.
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
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