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Name of Document: VRP First Semiannual Report

Date of Document: April 20, 2017

Site Name: Hood Packaging Corporation

Site ID Number: HIS 10089

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 - ☐ manifests
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I certify that the information I am submitting is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Name (printed): Henry Martin Rollins

Date: 4/13/2017

Organization: H. M. Rollins Company, Inc.

Phone: 228-832-1738

Email: mrollins@hmrollins.com

Receipt Date
(for EPD use only)

HOOD PACKAGING CORPORATION MADISON, MISSISSIPPI

Voluntary Remediation Program Semiannual Progress Report No. 1 Hood Packaging Corporation Site Valdosta, Georgia

**Prepared By:
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April 20, 2017

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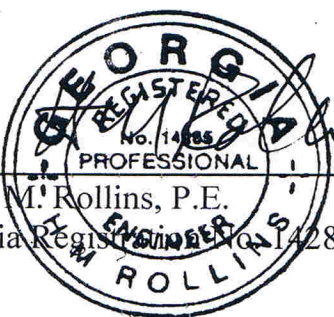
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ENGINEERING CERTIFICATION

I certify that I am a qualified groundwater scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by State registration and completion of accredited university courses, that enable me to make sound professional judgements regarding groundwater monitoring and contaminant fate-and-transport. I further certify that this report was prepared by myself or by a subordinate working under my direction.


Henry M. Rollins, P.E.
Georgia Registration No. 14285

4/13/17
Date

1.0 INTRODUCTION

This is the first Semiannual Progress Report being submitted under the Voluntary Remediation Program (VRP) on behalf of Hood Packaging Corporation (Hood) for the property known as Tract 2 located in the 900 block of River Street, Valdosta, Lowndes County, Georgia. The purpose of this report is to provide the Georgia Environmental Protection Division (EPD) with information concerning the activities accomplished on the site since the site was approved for participation in the Georgia Voluntary Remediation Program, to provide information requested by EPD in its comments on the Hood VRP Investigation and Remediation Plan, and to detail activities planned for the next six months.

2.0 BACKGROUND

Hood owns property in the 900 block on both sides of River Street in Valdosta, Georgia. Hood acquired a multi-wall bag manufacturing facility on the site in 1992 and operated the facility until May of 2009. The property consists of three parcels, known as Tracts 1, 2, and 3, all of which were listed on the Georgia Hazardous Site Inventory (HSI) as site 10089. Tracts 1 and 3 have been removed from the HSI by EPD, and Hood has sold Tract 3 to a third party. The site location is shown in Figure 1.

Unknown to Hood at the time of the 1992 acquisition, Tract 2 had been used for the manufacturing of fertilizer from the early 1900's to the 1970's. The site was listed on the HSI because of the presence of metals at levels exceeding the Georgia Hazardous Site Response Act (HSRA) notification thresholds.

Site investigations were conducted over a period of years that delineated the extent of contamination of the metals arsenic, lead, and barium in both soil and groundwater. A site Compliance Status Report (CSR) was prepared in 1999 and a Corrective Action Plan was submitted in 2006.

In 2010, the EPA and EPD performed a Site Reconnaissance and Pre-CERCLIS Screening Assessment (PSA) of Tract 2. The PSA employed XRF technology, and the results indicated the presence of additional metals, at above HSRA notification levels, at several locations. Hood subsequently took samples at the locations identified in the PSA and subjected them to laboratory analysis. The results of these analyses found only one additional metal, zinc, at the location identified in previous investigations as Large Area 4, at concentrations exceeding the HSRA notification levels. EPD has requested submittal of the results of the 2010 soil samples, and these activities are discussed in the body of the report.

After discussions with EPD, Hood prepared and submitted a VRP Application and Investigation and Remediation Plan. This document was dated September 12, 2014. The VRP application resulted in the issuance of Consent Order No. EPD-VRP-013, which once executed, enrolled the site in the VRP program. This consent order was fully executed on September 20, 2016.

3.0 CONFIRMATORY SOIL SAMPLING CONDUCTED IN 2010

In the VRP approval, EPD requested that the details of the soil sampling conducted in 2010 be provided in the first Semiannual Progress Report. This sampling was conducted to confirm the XRF estimated concentrations at four locations identified in the PSA.

The sampling points in the PSA report were identified by the letters A, B, C, D, and E. Sample point A was in the vicinity of what was identified in the previous site investigations as Small Area #1. Sample point B was located in the vicinity of what was identified in the previous site investigations as Large Area #4. Investigations at Small Area #1 and Large Area #4 previously delineated contamination for lead, arsenic, and barium as reported in the CSR. The only other metal identified at sample point A in the PSA at above the HSRA notification threshold was zinc. At sample point B, the only additional metals identified in the PSA above the HSRA notification threshold were zinc and chromium. Sample point C was located about 50 feet south of what was known as Building 10. At this point, only barium was found at above the HSRA notification threshold in the PSA. Sample point D was located near the former location of Building 9. At this location, in the PSA the estimated soil concentration exceeded the HSRA threshold for copper and lead. Measurements taken on the concrete slab itself reported values exceeding the HSRA thresholds for copper and zinc. Sample point E was located west of the existing Roll Storage Warehouse. No constituents were identified at this location in the PSA exceeding the HSRA threshold; therefore, no confirmatory sampling was conducted at this point.

The sampling points were located by EPA as a latitude and longitude using a handheld GPS along with a verbal description. Personnel from H. M. Rollins Company, Inc., traveled to the site on September 8, 2010, and began sampling activities on September 9, 2010. Each sampling location was located using a handheld GPS at the same coordinates identified by EPA in the PSA. The plan at each location was to take samples using a pre-cleansed, lined, stainless steel soil probe and mix the sample in a pre-cleansed, stainless steel pan using a pre-cleansed, stainless steel spoon. At some locations, the probe could not be driven due to obstructions, and the samples had to be taken from the sidewalls of

excavations using stainless steel spoons. Field notes in Appendix A describe this sampling exercise, and the analytical reports are also found in Appendix A.

At sample point A, three samples were taken. Sample A-1 was taken at the EPA sampling coordinates in the southern part of Small Area #1. To provide areal coverage, Sample A-2 was taken in the north part of Small Area #1, and Sample A-3 was a surface sample taken in the middle of Small Area #1 as an expected worst-case sample. Two samples were taken of the slag-like material for analysis. The analysis of the slag-like material reported iron as the primary constituent followed by sulfur, barium, and lead. The analytical results are included in Appendix A.

At sample point B, three samples were taken. Test holes encountered bricks and debris, and the test probe could not be driven. Sample B-1 was taken at the coordinates of the EPA sample at Large Area #4. Sample B-2 was taken five feet west. These two samples were taken with stainless steel spoons from the surface to a depth of 12 inches where brick rubble was encountered. Sample B-3 was taken as a surface sample at the center of Large Area #4 as an expected worst-case sample.

At sample point C, south of Building 10, test holes encountered brick rubble and the soil probe could not be driven. Two surface soil samples were taken at this location. Sample C-1 was taken at the EPA coordinates, and Sample C-2 was taken five feet west.

At sample point D, Sample D-1 was taken at the EPA sample coordinates using a pre-cleansed, stainless steel soil probe. Sample D-2 was a wipe sample of a 6-inch square of the concrete slab using a glass fiber wipe and distilled water. Sample D-2 was taken on the slab in the entrance area of the former building. Sample D-3 was taken 18 feet west of

sample point D-1 on the west side of the entrance slab, using a pre-cleansed, stainless steel soil probe.

No samples were taken at sample point E because the EPA XRF screening analysis did not report any constituents at above HSRA notification thresholds.

The soil samples were analyzed for the metals identified in the EPA screening analysis as being above the HSRA notification threshold. The results of the laboratory analysis found no additional metals exceeding the HSRA notification thresholds except zinc at the location known as Large Area #4. Delineation sampling for zinc at Large Area #4 is being accomplished as part of the VRP investigations.

The soil sampling locations are shown on Figure 2 and Table 1 presents the soil sampling results.

4.0 ACTIVITIES CONDUCTED IN THE FIRST SIX-MONTH REPORTING PERIOD

This section describes the activities that have been completed since September 20, 2016, when the site was accepted into the VRP. It was planned to redevelop and sample the groundwater monitoring wells during this time period, but during the initial site visit it was determined that five of the wells had been damaged or destroyed by equipment used to mow the site. The activities conducted during this reporting period included:

- Initial site visit to observe present conditions of the site including monitoring wells and areas of prior investigation.
- Soil sampling of Large Area #4 for delineation of zinc contamination.

- Computation of Default Type 2 RRS values for zinc in soil.
- Sampling of surface water.
- Sampling of MW-SB-13 and MW-SB-14.
- Coordination with contractor on work to repair or replace groundwater monitoring wells as needed.

4.1 Initial Site Visit

H. M. Rollins Company, Inc. (Rollins) personnel traveled to the site on November 15, 2016. The last site visit prior to this was in 2010.

Hood made arrangements to have a contractor bushhog the open areas of the site prior to the Rollins site visit. Rollins personnel performed a site walk through upon arrival. Monitoring wells MW-SB-12, MW-SB-4, MW-SB-2A, and MW-SB-1 were destroyed. An “MW” has been added to the previous groundwater monitoring well designations at EPD request. The monitoring well locations are shown on Figures 2, 3, and 5, and a table of well construction details is included as Table 5.

Initial attempts to locate the five wells on City property to the west were unsuccessful due to the presence of underbrush, with the exception of MW-SB-13 which is near the entrance road to the City park. Using a survey instrument and brush cutting equipment, wells MW-SB-8, MW-SB-9, MW-SB-9A, MW-SB-14, and MW-SB-15 were located. Well MW-SB-14 was found to be damaged by a tree that had fallen on the protective casing.

Due to the damage to the wells, the planned re-development and groundwater monitoring exercise was cancelled until the wells could be re-installed and/or repaired.

Samples were taken for informational purposes only, from wells MW-SB-13 and MW-SB-14 after bailing them dry. These wells are located near the previously defined downgradient extent of contamination. The results can not be used for other than informational purposes as the standard sampling protocols were not followed. The results for MW-SB-13 were: arsenic, 0.17 ppm; lead, 0.095 ppm; and zinc, 0.197 ppm. The results for MW-SB-14 were: arsenic, 0.020 ppm; lead, 0.104 ppm; and zinc, 0.137 ppm. These results for arsenic and lead are consistent with prior analyses, and the results for zinc are below the HSWA Type 1 groundwater levels. The results are found in Table 3.

4.2 Zinc Delineation at Large Area #4

The 2010 soil sampling confirmed the presence of zinc at Large Area #4 at above the 2800 ppm HSRA notification threshold. Given that it is expected that all the metals are associated with the same source, initial sampling was planned at the four sample points that were previously used to provide delineation for the other metals of concern. These sample points were previously identified as points 41, 42, 43, and 44. The samples taken at these locations in 2016 were identified as LA4-N, LA4-W, LA4-S, and LA4-E, respectively. One additional sample was taken 75 feet west of the western-most sample. This sample was identified as LA4-W2. The sample locations and zinc results are shown on Figure 3. Table 2 provides the analytical results in table form. The laboratory analytical reports and field notes are found in Appendix B.

All of the results are higher than the 100 ppm Type 1 Risk Reduction Standard (RRS) for zinc but comfortably below the most conservative default Type 2 RRS for zinc of approximately 5800 ppm. The most conservative default Type 2 RRS is based on leaching to groundwater with the groundwater concentration based upon the default child exposure scenario. A generic dilution and attenuation factor of 20 is used since the areal extent of Large Area #4 is less than 1/2 acre. The default Type 2 calculations are found in Figures 4A, 4B, 4C, 4D, and 4E. EPD guidance indicates that delineation to Type 2 default values is acceptable, and Hood requests EPD concurrence that delineation for zinc at Large Area #4 has been completed. The planned excavation of soils at Large Area #4 will remove all areas exhibiting concentrations exceeding the HSRA notification threshold for zinc.

4.3 Sampling of Surface Water

Samples of surface water were taken at the two closest sampling locations previously used for surface water characterization. These locations are where the surface drain flows under River Street and in the City park where the drain passes under the entrance road. Grab samples were taken at each location. A very slight flow was evident. The sampling locations are shown on Figure 5. The results of these samples are found in Table 4. The results did not indicate any impact on surface waters. The analytical results are in Appendix B. This surface water sampling will be repeated when personnel are next at the site for groundwater monitoring purposes.

4.4 Groundwater Monitoring Well Repair/Replacement

Contact was made with local contractors for repair and/or replacement of the damaged monitoring wells. Contractors have been to the site to verify conditions. An on-site meeting was held on March 23, 2017, to finalize plans. Well installation was scheduled to begin on April 11, 2017.

5.0 **PLANNED ACTIVITIES FOR THE NEXT REPORTING PERIOD**

5.1 On-site Activities

5.1.1 Soil Characterization

Soil delineation activities have previously been completed for arsenic, barium, and lead, and delineation for zinc to default Type 2 RRS levels was completed in the current 6-month reporting period. No further soil delineation work is planned.

In the next six-month period, it is planned to bring a small piece of excavation equipment to the site to dig test holes for disposal characterization of the soils at Large Area #4 and Small Area #1. Sample aliquots taken on an equal volume of planned excavation basis will be combined for disposal characterization using testing by the toxicity characteristic leaching procedure. Should this testing indicate that the soils would have to be managed as hazardous waste, Hood would plan to cap these areas, similar to what is planned for the other areas, rather than excavate for off-site disposal.

5.1.2 Groundwater Activities

The damaged monitoring wells will be replaced or repaired as needed. The wells planned to be monitored will be re-developed. The wells planned to be monitored going forward are wells: MW-SB-1R, MW-SB-1A, MW-SB-2, MW-SB-2AR, MW-SB-4R, MW-SB-5, MW-SB-6, MW-SB-8, MW-SB-9, MW-SB-9A, MW-SB-12R, MW-SB-13, MW-SB-14, and MW-SB-15. The “R” indicates the well designation after they are replaced. These wells will be monitored for the metals of concern at the site. It is anticipated that this round of monitoring will complete the groundwater delineation for zinc.

Contact will be made with the City of Valdosta regarding obtaining permission to install a permanent groundwater monitoring well in the City park on the west side of the natural drain. This well will function as the Point of Demonstration Well as defined in OCGA 12-8-102(a)(10). Discussions will also be held with City of Valdosta representatives concerning the means to ensure that no drinking water wells will be installed in the future in the potentially impacted area.

6.0 VRP PROJECT MANAGEMENT

6.1 Professional Oversight

Oversight for this project is being provided by H. Martin Rollins, P.E. (Georgia #14285). A summary of hours committed to this project during the reporting period is shown in the following table.

H. M. Rollins, P.E. (Georgia #14285)		
	Hours Invoiced	Work Completed
October 2016	14	Oversight of the work described in this report.
November 2016	49	
December 2016	22.5	
January 2017	10.5	
February 2017	3.5	
March 2017 (Est)	102	

6.2 Project Schedule

The soil delineation for zinc was completed in this reporting period. The damage to the monitoring well system prevented groundwater delineation for zinc, but it will be completed in the next reporting period. The balance of the project schedule remains unchanged at this time.

7.0 REFERENCES

H. M. Rollins Company, Inc., 1999.

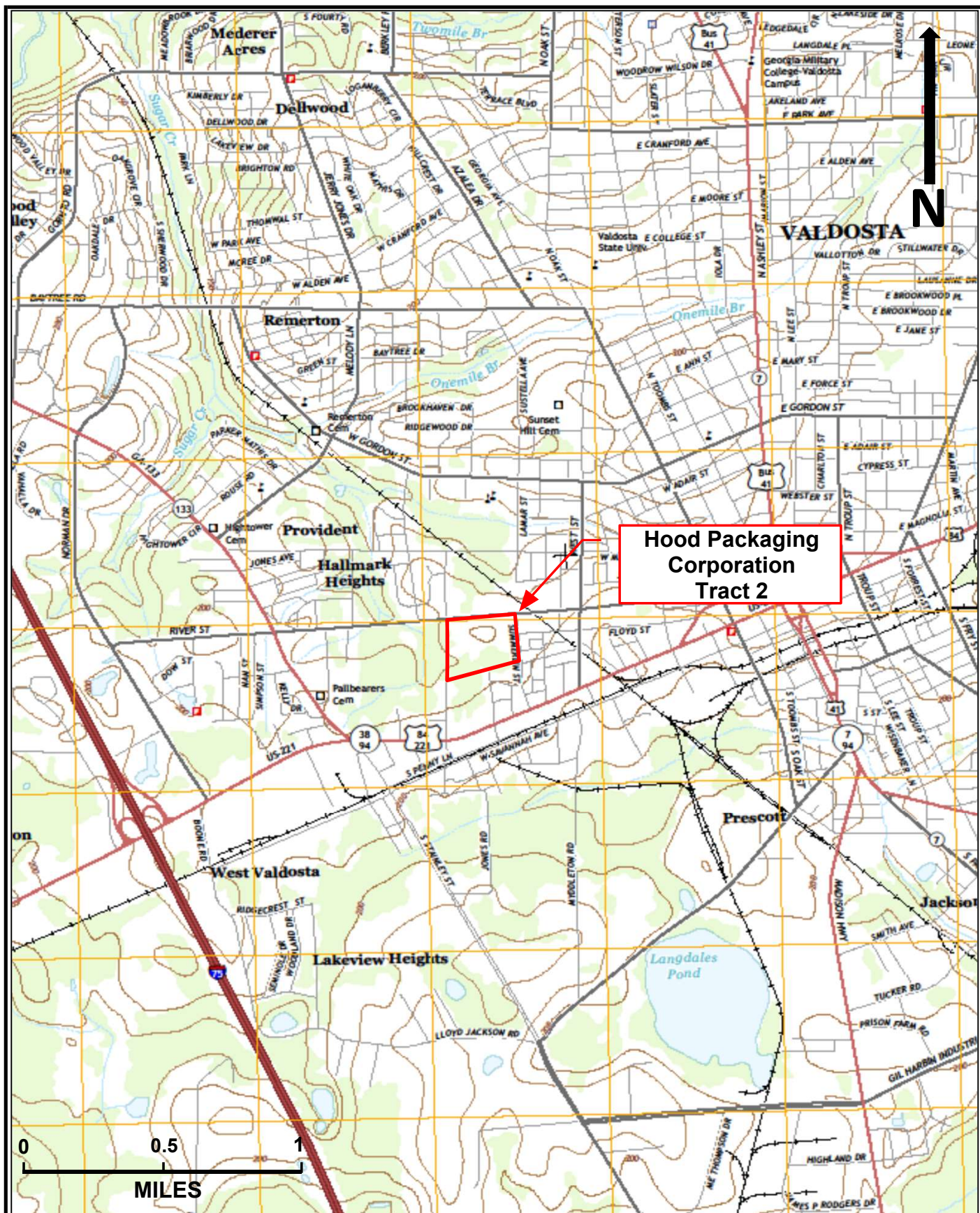
Compliance Status Report. Prepared by H. M. Rollins Company, Inc., Last Revision September, 1999.

H. M. Rollins Company, Inc., 2006.

Corrective Action Plan. Prepared by H. M. Rollins Company, Inc., Last Revision May 1, 2006.

H. M. Rollins Company, Inc., 2014.

Voluntary Remediation Program, Application, Investigation, and Remediation Plan. Prepared by H. M. Rollins Company, Inc., September, 2014.



HOOD PACKAGING CORPORATION VALDOSTA, GEORGIA

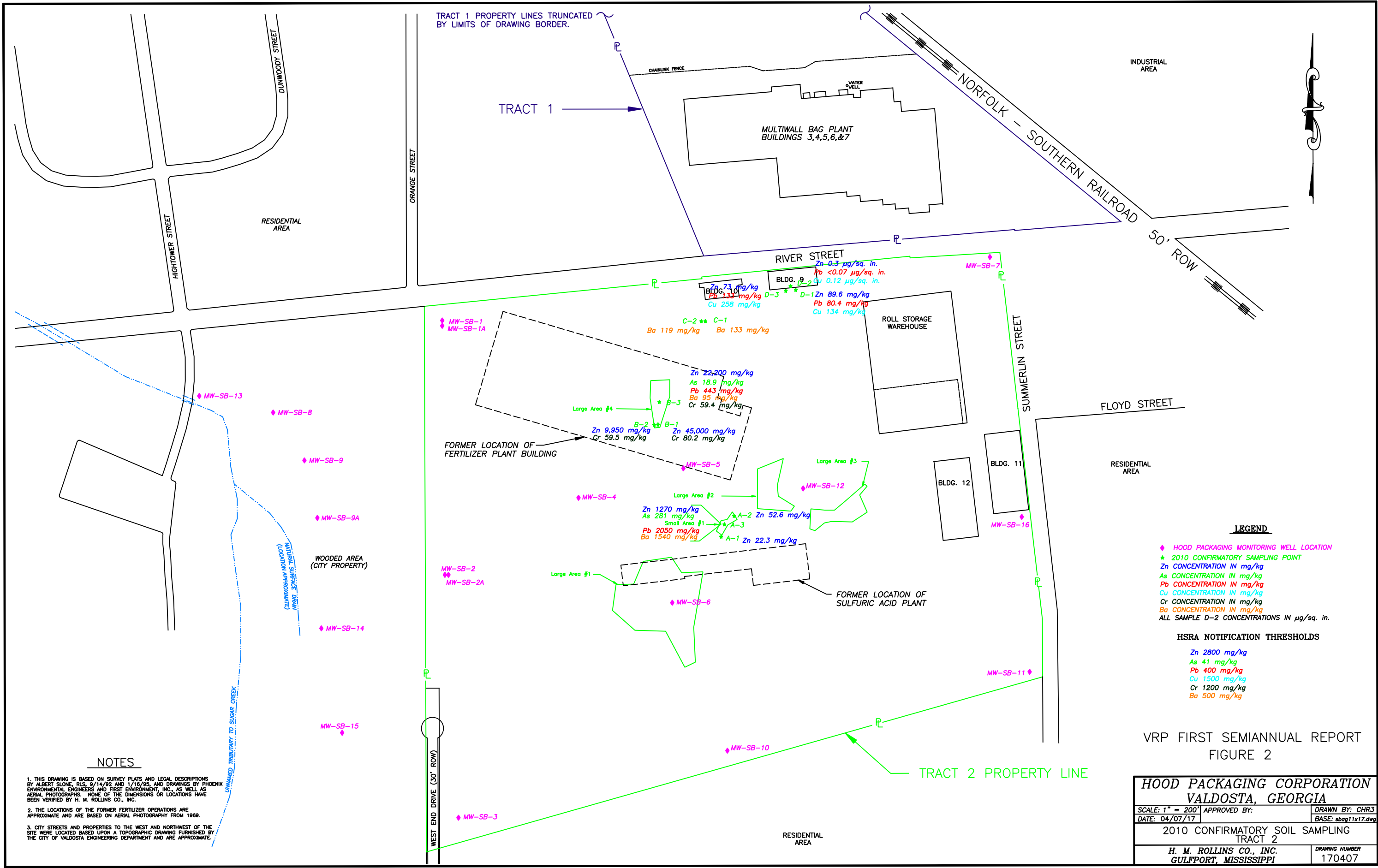
SITE LOCATION MAP

H.M. ROLLINS CO., INC.
GULFPORT, MISSISSIPPI

DRAWING NUMBER: 170315

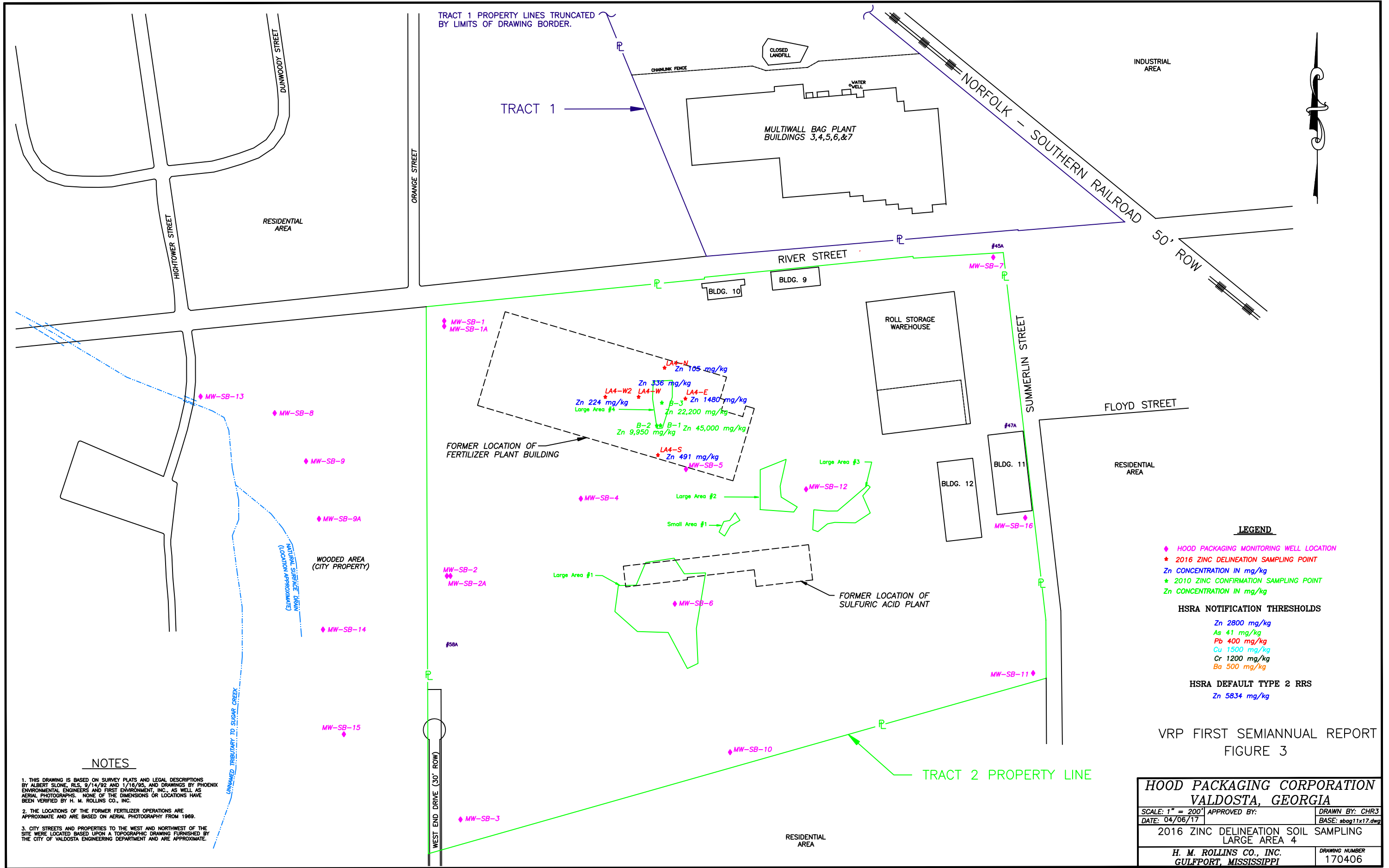
U.S.G.S. TOPOGRAPHIC MAP
QUAD: VALDOSTA 7.5 MINUTE SERIES

Figure 1



VRP FIRST SEMIANNUAL REPORT
FIGURE 2

HOOD PACKAGING CORPORATION VALDOSTA, GEORGIA		
SCALE: 1" = 200'	APPROVED BY:	DRAWN BY: CHR3
DATE: 04/07/17		BASE: sbag11x17.dwg
2010 CONFIRMATORY SOIL SAMPLING TRACT 2		
H. M. ROLLINS CO., INC. GULFPORT, MISSISSIPPI		DRAWING NUMBER 170407



RAGS Part B - Equations 1 & 2 - Risk-based Preliminary Remediation Goals
GEORGIA TYPE 2 STANDARDS - RESIDENTIAL SCENARIO
GROUNDWATER
ZINC-ADULT

Common Variables

EF	350	exposure frequency	days/yr	(391-3-19 Table 3)
ED	30	exposure duration	yr	(391-3-19 Table 3)
BW	70	adult body weight	kg	(391-3-19 Table 3)
AT	70	averaging time (carcinogen)	yr	(391-3-19 Table 3)
AT	30	averaging time (non-carcinogen)	yr	(391-3-19 Table 3)
IR _{air}	15	daily indoor inhalation rate	m ³ /day	(391-3-19 Table 3)
IR _{water}	2	daily water ingestion rate	L/day	(391-3-19 Table 3)
K	0.5	volatilization factor	L/m ³	(391-3-19 Table 3)

Eq. 1 Exposure To Groundwater: Carcinogenic Effects - ZINC

TR	1.00E-05	target excess cancer risk	unitless	(391-3-19 Table 3)
SF _o	NA	oral cancer slope factor	(mg/kg-day) ⁻¹	(No data in IRIS)
SF _i	NA	inhalation cancer slope factor	(mg/kg-day) ⁻¹	(No data in IRIS)

$$C = \frac{TR * BW * AT * 365}{EF * ED * [(SF_i * K * IR_{air}) + (SF_o * IR_{water})]}$$

Allowable Concentration No Carcinogenic Data mg/L (Carcinogenic Effects)

Eq. 2 Exposure To Groundwater: Noncarcinogenic Effects - ZINC

THI	1	target hazard index	unitless	(391-3-19 Table 3)
RfD _o	3.00E-01	oral chronic reference dose	mg/kg-day	(EPA IRIS)
RfD _i	NA	inhalation chronic reference dose	mg/kg-day	(No data in IRIS)

$$C = \frac{THI * BW * AT * 365}{EF * ED * [(1/RfD_i * K * IR_{air}) + (1/RfD_o * IR_{water})]}$$

Allowable Concentration 10.95 mg/L (Noncarcinogenic Effects)

RAGS Part B - Equations 6 & 7 - Risk-based Preliminary Remediation Goals
GEORGIA TYPE 2 STANDARDS - RESIDENTIAL SCENARIO
SOIL
ZINC-ADULT

Common Variables

EF	350	exposure frequency	days/yr	(391-3-19 Table 3)
ED	30	exposure duration	yr	(391-3-19 Table 3)
BW	70	adult body weight	kg	(391-3-19 Table 3)
AT	70	averaging time (carcinogen)	yr	(391-3-19 Table 3)
AT	30	averaging time (non-carcinogen)	yr	(391-3-19 Table 3)

Ingestion of Soil - ZINC

IR _{soil}	114	soil ingestion rate	mg/day	(391-3-19 Table 3)
SF _o	NA	oral cancer slope factor	(mg/kg-day) ⁻¹	(EPA IRIS)
RfD _o	3.00E-01	oral chronic reference dose	(mg/kg-day) ⁻¹	(EPA IRIS)

Inhalation of Particulates - ZINC

IR _{air}	15	inhalation rate	m ³ /day	(391-3-19 Table 3)
PEF	4.63E+09	particulate emission factor	m ³ /kg	(391-3-19 Table 3)
1/VF	0	1 / soil-to air volatilization factor	1 / (m ³ /kg)	(chemical specific)
SF _i	NA	inhalation cancer slope factor	(mg/kg-day) ⁻¹	(No data in IRIS)
RfD _i	NA	inhalation chronic reference dose	(mg/kg-day) ⁻¹	(No data in IRIS)

Eq. 6 Exposure To Soil: Carcinogenic Effects - ZINC

TR	1.00E-05	target excess cancer risk	unitless	(391-3-19 Table 3)
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$$C_{\text{(risk based)}} = \frac{TR * BW * AT * 365}{EF * ED * [(SF_o * 1.00E-6 * IR_{\text{soil}}) + (SF_i * IR_{\text{air}} * (1/VF + 1/PEF))]}$$

Allowable Concentration	No Carcinogenic Data	mg/kg	for a target excess individual lifetime cancer risk of	1.00E-05
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Eq. 7 Exposure To Soil: Noncarcinogenic Effects - ZINC

THI	1	target hazard index	unitless	(391-3-19 Table 3)
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$$C_{\text{(risk based)}} = \frac{THI * BW * AT * 365}{EF * ED * [(1/RfD_o * 1.00E-6 * IR_{\text{soil}}) + (1/RfD_i * IR_{\text{air}} * (1/VF + 1/PEF))]}$$

Allowable Concentration	192105	mg/kg	for a target hazard index of	1
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RAGS Part B - Equations 1 & 2 - Risk-based Preliminary Remediation Goals
GEORGIA TYPE 2 STANDARDS - RESIDENTIAL SCENARIO
GROUNDWATER
ZINC-CHILD

Common Variables

EF	350	exposure frequency	days/yr	(391-3-19 Table 3)
ED	6	exposure duration	yr	(EPD Guidance)
BW	15	child body weight	kg	(EPD Guidance)
AT	70	average time (carcinogen)	yr	(EPD Guidance)
AT	6	averaging time (non-carcinogen)	yr	(EPD Guidance)
IR _{air}	15	daily indoor inhalation rate	m ³ /day	(EPD Guidance)
IR _{water}	1	daily water ingestion rate	L/day	(EPD Guidance)
K	0.5	volatilization factor	L/m ³	(391-3-19 Table 3)

Eq. 1 Exposure To Groundwater: Carcinogenic Effects - ZINC

TR	1.00E-05	target excess cancer risk	unitless	(391-3-19 Table 3)
SF _o	NA	oral cancer slope factor	(mg/kg-day) ⁻¹	(No data in IRIS)
SF _i	NA	inhalation cancer slope factor	(mg/kg-day) ⁻¹	(No data in IRIS)

$$C = \frac{TR * BW * AT * 365}{EF * ED * [(SF_i * K * IR_{air}) + (SF_o * IR_{water})]}$$

Allowable Concentration No Carcinogenic Data mg/L (Carcinogenic Effects)

Eq. 2 Exposure To Groundwater: Noncarcinogenic Effects - ZINC

THI	1	target hazard index	unitless	(391-3-19 Table 3)
RfD _o	3.00E-01	oral chronic reference dose	mg/kg-day	(EPA IRIS)
RfD _i	NA	inhalation chronic reference dose	mg/kg-day	(No data in IRIS)

$$C = \frac{THI * BW * AT * 365}{EF * ED * [(1/RfD_i * K * IR_{air}) + (1/RfD_o * IR_{water})]}$$

Allowable Concentration 4.69 mg/L (Noncarcinogenic Effects)

RAGS Part B - Equations 6 & 7 - Risk-based Preliminary Remediation Goals

GEORGIA TYPE 2 STANDARDS - RESIDENTIAL SCENARIO

SOIL

ZINC-CHILD

Common Variables

EF	350	exposure frequency	days/yr	(391-3-19 Table 3)
ED	6	exposure duration	yr	(EPD Guidance)
BW	15	child body weight	kg	(EPD Guidance)
AT	70	average time (carcinogen)	yr	(EPD Guidance)
AT	6	averaging time (non-carcinogen)	yr	(EPD Guidance)

Ingestion of Soil - ZINC

IR _{soil}	200	soil ingestion rate	mg/day	(EPD Guidance)
SF _o	NA	oral cancer slope factor	(mg/kg-day) ⁻¹	(No data in IRIS)
RfD _o	3.00E-01	oral chronic reference dose	(mg/kg-day) ⁻¹	(EPA IRIS)

Inhalation of Particulates - ZINC

IR _{air}	15	inhalation rate	m ³ /day	(391-3-19 Table 3)
PEF	4.63E+09	particulate emission factor	m ³ /kg	(391-3-19 Table 3)
1/VF	0	1 / soil-to air volatilization factor	1 / (m ³ /kg)	(chemical specific)
SF _i	NA	inhalation cancer slope factor	(mg/kg-day) ⁻¹	(No data in IRIS)
RfD _i	NA	inhalation chronic reference dose	(mg/kg-day) ⁻¹	(No data in IRIS)

Eq. 6 Exposure To Soil: Carcinogenic Effects - ZINC

TR	1.00E-05	target excess cancer risk	unitless	(391-3-19 Table 3)
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$$C_{\text{(risk based)}} = \frac{TR * BW * AT * 365}{EF * ED * [(SF_o * 1.00E-6 * IR_{\text{soil}}) + (SF_i * IR_{\text{air}} * (1/VF + 1/PEF))]}$$

Allowable Concentration	No Carcinogenic Data	mg/kg	for a target excess individual lifetime cancer risk of	1.00E-05
-------------------------	----------------------	-------	--	----------

Eq. 7 Exposure To Soil: Noncarcinogenic Effects - ZINC

THI	1	target hazard index	unitless	(391-3-19 Table 3)
-----	---	---------------------	----------	--------------------

$$C_{\text{(risk based)}} = \frac{THI * BW * AT * 365}{EF * ED * [(1/RfD_o * 1.00E-6 * IR_{\text{soil}}) + (1/RfD_i * IR_{\text{air}} * (1/VF + 1/PEF))]}$$

Allowable Concentration	23464	mg/kg	for a target hazard index of	1
-------------------------	-------	-------	------------------------------	---

RAGS Part B - Equation B-13 SSL PARTITIONING FOR MIGRATION TO GROUNDWATER ZINC

Common Variables

K_D	62	soil-water partitioning coefficient	L/kg	(EPA, 2002) ^a
θ_w	0.3	water-filled soil porosity	$L_{\text{water}}/L_{\text{soil}}$	(EPA, 2002)
θ_a	0.1340	air-filled soil porosity	$L_{\text{air}}/L_{\text{soil}}$	(EPA, 2002) ^b
ρ_b	1.5	dry soil bulk density	kg/L	(EPA, 2002)
ρ_s	2.65	soil particle density	kg/L	(EPA, 2002)
n	0.4340	soil porosity	$L_{\text{pore}}/L_{\text{soil}}$	(EPA, 2002) ^c
H'	0	Henry's law constant	unitless	(EPA, 2002) ^d
DAF	20	dilution-attenuation factor	unitless	(EPD Guidance) ^e

Eq. B-13 Soil screening level for migration to groundwater-ADULT

G_w	10.95	groundwater criteria	mg/L	
C_w	219	target soil leachate concentration	mg/L	= (G_w *DAF)

$$\text{SSL} = C_w \left[K_D + \frac{(\theta_w + \theta_a H')}{\rho_b} \right]$$

Soil Screening Level in Soil **13622** mg/kg

Eq. B-13 Soil screening level for migration to groundwater-CHILD

G_w	4.69	groundwater criteria	mg/L	
C_w	94	target soil leachate concentration	mg/L	= (G_w *DAF)

$$\text{SSL} = C_w \left[K_D + \frac{(\theta_w + \theta_a H')}{\rho_b} \right]$$

Soil Screening Level in Soil **5834** mg/kg

References:

(EPA, 2002): Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites Eq. B-13

^a App. C; Assuming a pH of 6.8 for Metals

^b $n - \theta_w$

^c $1 - (\rho_b / \rho_s)$

^d Assume to be zero for inorganic contaminants except mercury

^e EPA default DAF for source areas smaller than 1/2 acre

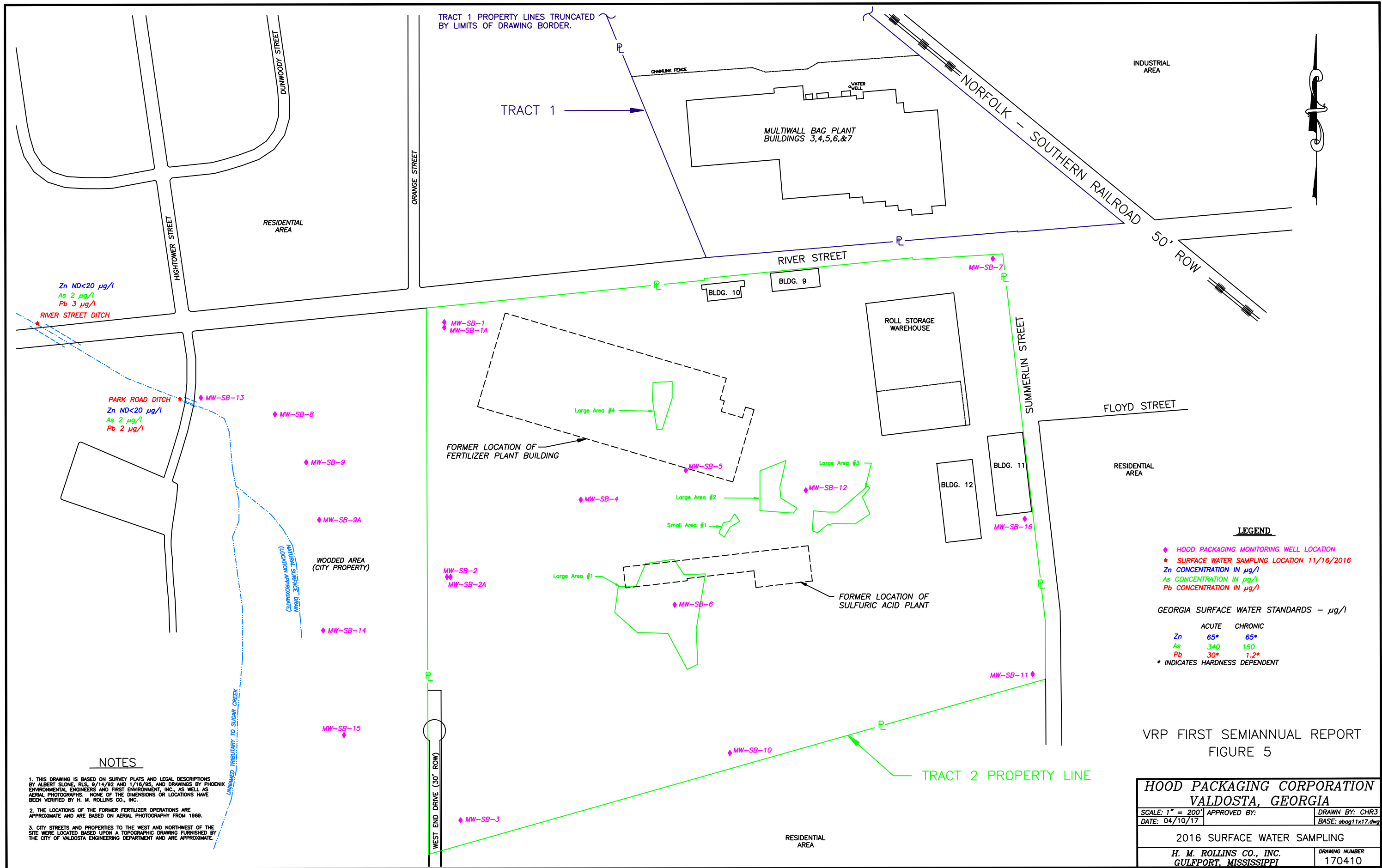


TABLE 1**2010 Confirmatory Soil Sample Results**

	Zinc	Arsenic	Lead	Copper	Chromium	Barium
HSRA Notification Threshold	2800 mg/kg	41 mg/kg	400 mg/kg	1500 mg/kg	1200 mg/kg	500 mg/kg
Sample ID	All results in mg/kg except where noted.					
D-1	89.6	NA	80.4	134	NA	NA
D-2 (wipe)	10.8 µg/wipe	NA	<2.5 µg/wipe	4.16 µg/wipe	NA	NA
D-2 (area)	0.3 µg/in ²	NA	<0.07 µg/in ²	0.12 µg/in ²	NA	NA
D-3	73	NA	133	258	NA	NA
A-1	22.3	NA	NA	NA	NA	NA
A-2	52.6	NA	NA	NA	NA	NA
A-3	1,270	281	2,050	NA	NA	1,540
B-1	45,000	NA	NA	NA	80.2	NA
B-2	9,950	NA	NA	NA	59.5	NA
B-3	22,200	18.9	443	NA	59.4	95.0
C-1	NA	NA	NA	NA	NA	133
C-2	NA	NA	NA	NA	NA	119
B-1 Dup	33,400	NA	NA	NA	NA	NA
B-2 Dup	8,290	NA	NA	NA	NA	NA
B-3 Dup	23,100	NA	NA	NA	NA	NA

NA indicates no analysis for constituent.

TABLE 2**Zinc Delineation at Large Area 4**

	Zinc
Default Type 2 HSRA Soil Delineation Concentration, mg/kg	5834
Sample ID	All results in mg/kg.
LA4-N	105
LA4-E	1480
LA4-S	491
LA4-W	336
LA4-W2	224

TABLE 3

**Groundwater Sampling Results
November 16, 2016**

	Arsenic	Lead	Zinc
HSRA Type 1 Standards (mg/l)	0.010	0.015	2.0
Sample ID	All results in mg/l.		
MW-SB-13	0.170	0.095	0.197
MW-SB-14	0.020	0.104	0.137

TABLE 4**Surface Water Sampling Results
November 16, 2016**

		Arsenic	Lead	Zinc
Georgia Surface Water Standards, µg/l * indicates hardness dependent	Acute Chronic	340 150	30* 1.2*	65* 65*
Sample ID		All results in µg/l.		
Park Road Ditch		2	2	ND (<20)
River Street Ditch		2	3	ND (<20)

TABLE 5

**Monitoring Well Construction Details
Hood Packaging Corporation
Valdosta, Georgia**

Well No.	Total Depth (feet, BLS)	Screen Length (feet)	Construction	Measuring Point Elevation (feet NGVD)
MW-SB-1*	13	10	2" PVC	189.28
MW-SB-1A	51	10	2" PVC	189.25
MW-SB-2	13	10	2" PVC	188.52
MW-SB-2A*	31	10	2" PVC	188.58
MW-SB-3	17	10	2" PVC	192.32
MW-SB-4*	9	5	2" PVC	192.88
MW-SB-5	11	5	2" PVC	197.53
MW-SB-6	17	10	2" PVC	194.76
MW-SB-7	24	10	2" PVC	196.40
MW-SB-8	13	5	2" PVC	180.10
MW-SB-9	13	5	2" PVC	182.25
MW-SB-9A	12	10	2" PVC	183.86
MW-SB-10	19	10	2" PVC	193.04
MW-SB-11	22	15	2" PVC	199.38
MW-SB-12*	7	5	2" PVC	199.08
MW-SB-13	12.5	10	2" PVC	179.49
MW-SB-14#	6.5	5	2" PVC	183.66
MW-SB-15	7	5	2" PVC	186.17
MW-SB-16	15	10	2" PVC	198.55

* Well destroyed - to be replaced

Well damaged - to be repaired

Appendix A

9/9/2010 - Valdez Area Food Packaging
H.M. Rollins

On site 7:52 a.m.

Purpose - to take confirmatory samples in areas where EPA/state used XRF instrument and found levels of Cu, Zn + Cr at above

HSA notification standards

Using clean stainless steel soil probes, spoons, and mixing pans

3 site - 1 near building 9 slab 30.82991

83.29613 $\pm 9'$

Located point just east of entrance to Bldg 9 slab $\pm 16'$

Checked my GPS against their report

N/W post of wall storage measurements.

I was about 15' SE of post when at their readings

General area on south of slab shows

char + clinker as if building burned

Slab clean in most places but covered in

char + debris in SE 1/4 (concrete walls etc.

Sampling with 1" driven soil probe - fully mix in span

Sample 1 at point D drove to 24" covered 22" 8:50 a.m.

Top 4" gray sand-clay.

6" reddish sand (iron concretions)

6" brown-bk organic silt clump

6" tan sand - clump

Sample point ~ 12' from building 9 slab 30.82991

\pm on east side of entrance slab 83.29613 $\pm 16'$

Sample D-2

9:05

Glass fiber filter wipe of 6" square
of building 9 slab with distilled water.

Sampled at entrance to building 9

Sample D-3 12' from slab & west of

9:40 am

entrance slab for building 9

approx 18' W of D-1 -

②

Drove 24" got 21" recovery

Top 8" gray sand w red brick remnants - clay

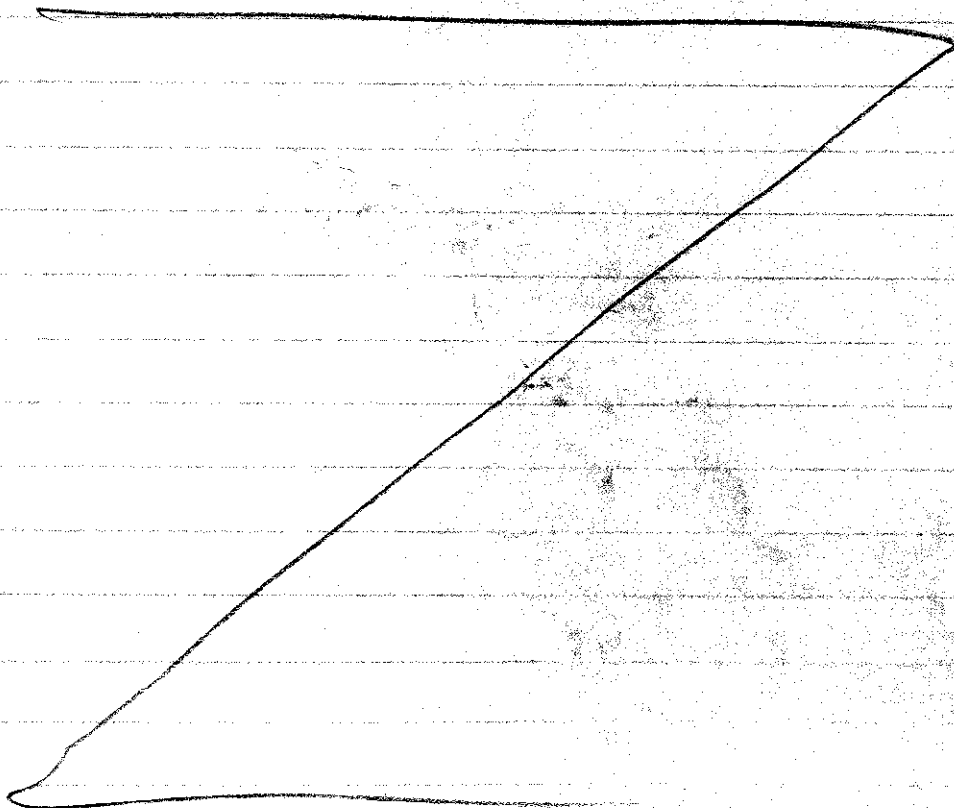
2" reddish - iron-sand w iron concretions - clay

3" ash & cinders

clay

8" tan/grey sand - clay

some small gravel



Point A.

30.82838

Only concerned with Zn
here

83.24668

At this word you are about 10' south of
area of purplish rocky material - Small area 1
Tried to dig through to see how deep. Didn't
succeed. Went about 6' took 2 "cores"
samples - 1 purple outside - purple/black inside
1 - purple outside - crumbly yellow inside (sulphur)

General view - SB-12 is knocked over

A-1

Drove to 24" 23" recovery

10:58

Top 6" organic sandy loam - roots & is damp

Next 8" Brown/tan silty sand damp

Bottom 9" Tan silty sand damp

located on south side of small area 1

24" from edge of no vegetation

A-2 on north side of Small area 1

11:25

Drove to 24" got only 14" recovery

Hard clinker at top -

Tan/gray silty sand balance

A-3

scraped surface in middle of small area 1
just small fragments - no "walls"

11:35

Point B

30.82924

83 24710

Point is about 5' south of unvegetated area
probably house Area #4

Dug test hole w/shovel hit solid
red brick floor at 12" @ above curbs
hit 2x6 & pulled out of hole - obviously lifted area

Second hole 5' west - same result
EPA/stake describes as "rich soil"
and this meets that description

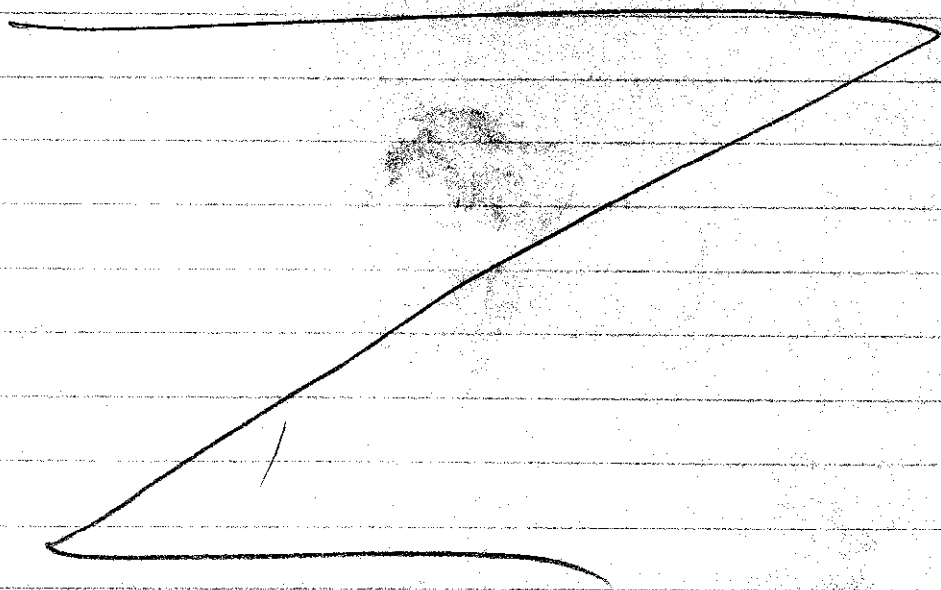
Sampling from side walls of holes.

All as dark sandy loam - dry - some brick fragments

B-1 east 12:10pm

B-2 west 12:25

12:45 B-3 Scraped fines from center of bare area
brick fragments for same



Point C

Lead on Cy

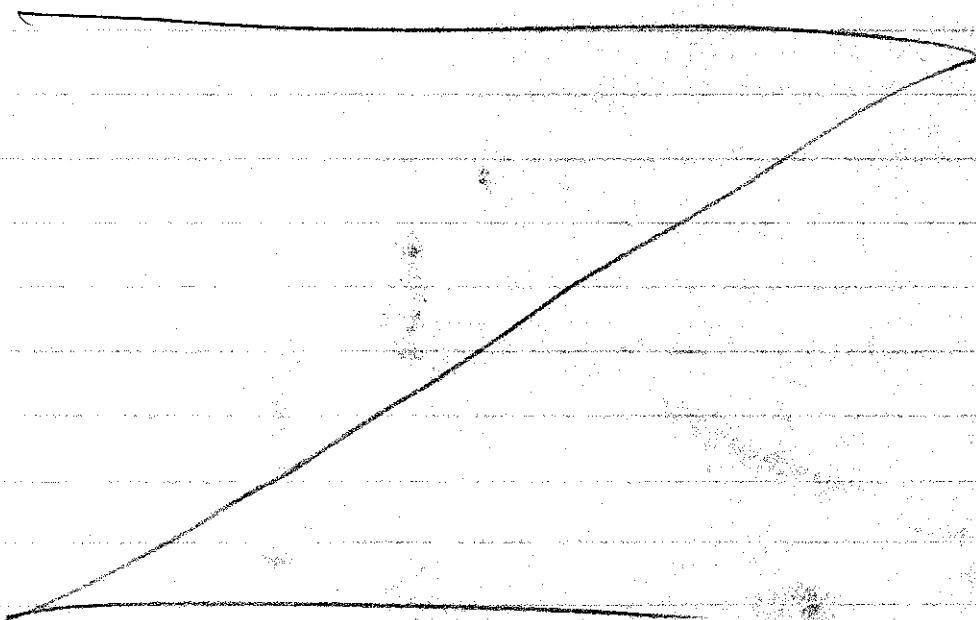
30.82975

83.29677

Location is about 12' south of fence corner
 Bldg 10, at gate in south line about 45'
 from west fence line. Point is 5' west
 of Bldg 10 SW corner 12' west of other slab
 Tried to dig with shovel - brick rubble ^{not on dig}
 Dig 3 holes - all hit rubble @ 4"-6" deep
 Taking 2 samples of surface soils 0"-4" deep

1:30 C-1 East - Brn/blk sandy loam w/ roots
 1:45 C-2 West " "

Sample C-1 at equals
 C-2 about 5' west



9/10/10 - back at office
 Chain of Custody & Residual
 analyses

At Point D Soil #1 was over for Cu
 Soil #2 was over for Pb
 Sig was over for nothing
 Caninele was over for Cu + Zn

So Let's analyze

D-1 & D3 for Cu, Pb + Zn

D2 - wipe - analyze for Cu Pb + Zn

At Point A - Many over for As, Ba, Pb
 Only 1 over for Zn

A-1 - soil sample side only for Zn

A-2 - soil north side only for Zn

A-3 - surface soil in center analyze for As, Ba, Pb, Zn

At Point B - Only over for Zn in 2 samples
 & Cu in one sample not
 over for As Ba Pb

B-1 - 0"-12" soil analyze for Cu + Zn

B-2 - same Cu + Zn

B-3 surface scrape in center - As, Ba, Pb, Cu, Zn

At Point C, Only over for Chromium

C-1 0"-4" analyze for Ba

C-2 Ba



6500 Sunplex Drive
Ocean Springs, MS 39564
228.875.6420 Phone
228.875.6423 Fax

October 21, 2010

HM Rollins

Work Order # : 1009176

HM Rollins Company

PO Box 3471

Gulfport, MS 39505

RE: Hood Packaging Corporation @ Valdosta, GA

Purchase Order #:

Enclosed are Micro-Methods Laboratory, Inc. results of analyses performed on samples received
09/10/10 14:52. If you have any questions concerning this report, please feel free to contact the office.

Sincerely,

A handwritten signature in black ink that reads "Harry P. Howell". The signature is written in a cursive, flowing style.

Harry P. Howell

President

Micro-Methods Laboratory, Inc.

DISCLAIMER

The results only relate to the items or the sample and/or samples received by the laboratory. This report shall not be reproduced except in full, without the approval of the laboratory. All test methods performed meet the requirements of NELAC 2003 Standards. Any variances and/or deviations specific to this analytical report are referenced in the lab report using qualifiers and detailed explanations found in the case narrative.

HM Rollins Company
 PO Box 3471
 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/21/10 11:57

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date/Time Sampled	Sampled by	Date/Time Received
D-1 Soil	1009176-01	Soil	09/09/10 08:50	HM Rollins	09/10/10 14:52
D-2 Glass Filter Wipe Sample	1009176-02	Wipe	09/09/10 09:05	HM Rollins	09/10/10 14:52
D-3 Soil	1009176-03	Soil	09/09/10 09:40	HM Rollins	09/10/10 14:52
A-1 Soil	1009176-04	Soil	09/09/10 10:58	HM Rollins	09/10/10 14:52
A-2 Soil	1009176-05	Soil	09/09/10 11:25	HM Rollins	09/10/10 14:52
A-3 Soil	1009176-06	Soil	09/09/10 11:35	HM Rollins	09/10/10 14:52
B-1 Soil	1009176-07	Soil	09/09/10 12:10	HM Rollins	09/10/10 14:52
B-2 Soil	1009176-08	Soil	09/09/10 12:25	HM Rollins	09/10/10 14:52
B-3 Soil	1009176-09	Soil	09/09/10 12:45	HM Rollins	09/10/10 14:52
C-1 Soil	1009176-10	Soil	09/09/10 13:30	HM Rollins	09/10/10 14:52
C-2 Soil	1009176-11	Soil	09/09/10 13:45	HM Rollins	09/10/10 14:52
B-1 Soil DUP	1009176-12	Soil	09/09/10 12:10	HM Rollins	09/10/10 14:52
B-2 Soil DUP	1009176-13	Soil	09/09/10 12:25	HM Rollins	09/10/10 14:52
B-3 Soil DUP	1009176-14	Soil	09/09/10 12:45	HM Rollins	09/10/10 14:52

Sample Receipt Conditions

Date/Time Received: 9/10/2010 2:52:00PM

Shipped by: Client Delivery

Received by: Paul D. Gatchell

Submitted by: HM Rollins

Date/Time Logged: 9/13/2010 1:19:00PM

Logged by: Paul D. Gatchell

 Cooler ID: Default Cooler

Receipt Temperature: _____

 Custody Seals No

 Received on Ice No

 Containers Intact Yes

 No Ice, Short Trip No

 COC/Labels Agree Yes

 Obvious Contamination No

 Labels Complete Yes

 Rush to meet HT No

 COC Complete Yes

HM Rollins Company
PO Box 3471
Gulfport MS, 39505Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM RollinsReported:
10/21/10 11:57**CASE NARRATIVE SUMMARY**

All reported results are within Micro-Methods Laboratory, Inc. defined laboratory quality control objectives unless detailed in narrative summary or identified as qualifications. NOTE: All results listed on this report are calculated on a wet weight basis (as received by the laboratory) unless otherwise noted in the analysis qualification sections.

Summary Comments: *No Summary Comments***Metals Total SW 6010B-SW 6010B****Qualification:**

DW Sample Results and Reporting Limits calculated on Dry Weight Basis.

Analyte & Samples(s) Qualified:

0115003-DUP1, 0115003-MS1, 0115003-MSD1, 0J20004-DUP1, 1009176-01[D-1 Soil], 1009176-03[D-3 Soil], 1009176-04[A-1 Soil], 1009176-05[A-2 Soil], 1009176-06[A-3 Soil], 1009176-07[B-1 Soil], 1009176-08[B-2 Soil], 1009176-09[B-3 Soil], 1009176-10[C-1 Soil], 1009176-11[C-2 Soil], 1009176-12[B-1 Soil DUP], 1009176-13[B-2 Soil DUP], 1009176-14[B-3 Soil DUP]

E-01 The concentration for this analyte is above the calibration range of the instrument. Results are from a secondary dilution.

Zinc

0J20004-DUP1, 1009176-07[B-1 Soil], 1009176-08[B-2 Soil], 1009176-09[B-3 Soil], 1009176-12[B-1 Soil DUP], 1009176-13[B-2 Soil DUP], 1009176-14[B-3 Soil DUP]

QD-10 The analyte concentration is greater than 10 times the spike concentration. The Matrix Spike result reported as Duplicate. The QC batch was accepted based on LCS/LCSD and Duplicate recoveries within the acceptance limits.

Arsenic, Barium, Lead

0115003-DUP1

QM-05 The spike recovery was outside acceptance limits for the MS and/or MSD due to matrix interference. The LCS and/or LCSD were within acceptance limits showing that the laboratory is in control and the data is acceptable.

Zinc

0115003-MS1, 0115003-MSD1

QM-4X The spike recovery was outside of QC acceptance limits for the MS and/or MSD due to analyte concentration at 4 times or greater than the spike concentration. The QC batch was accepted based on LCS and/or LCSD recoveries within the acceptance limits.

Copper

0115003-MS1, 0115003-MSD1

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 Reported:
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D-1 Soil
1009176-01 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Copper	134	0.496	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 12:23	SW 6010B	
Lead	80.4	2.48	"	"	"	SCH	"	"	"	
Zinc	89.6	0.993	"	"	"	SCH	"	"	"	

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D-2 Glass Filter Wipe Sample
1009176-02 (Wipe)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										
Copper	4.16	0.500	ug/wipe	1	0115004	SCH	09/15/10 09:30	10/05/10 11:47	SW 6010B	
Lead	ND	2.50	"	"	"	SCH	"	"	"	
Zinc	10.8	1.00	"	"	"	SCH	"	"	"	

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 Reported:
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D-3 Soil
1009176-03 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Copper	258	0.496	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 12:27	SW 6010B	
Lead	133	2.48	"	"	"	SCH	"	"	"	
Zinc	73.0	0.993	"	"	"	SCH	"	"	"	



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Project Number: [none]
Project Manager: HM Rollins

Reported:
10/21/10 11:57

A-1 Soil

1009176-04 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Zinc	22.3	0.938	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 12:30	SW 6010B	

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



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Project Manager: HM Rollins

Reported:
10/21/10 11:57

A-2 Soil

1009176-05 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Zinc	52.6	0.970	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 12:41	SW 6010B	

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 Project Manager: HM Rollins

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A-3 Soil
1009176-06 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Arsenic	281	2.42	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 12:47	SW 6010B	
Barium	1540	0.484	"	"	"	SCH	"	"	"	
Lead	2050	2.42	"	"	"	SCH	"	"	"	
Zinc	1270	0.968	"	"	"	SCH	"	"	"	

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 Reported:
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B-1 Soil
1009176-07 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Chromium	80.2	0.483	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 12:49	SW 6010B	
Zinc	45000	19.3	"	20	"	SCH	"	09/30/10 16:32	"	E-01

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 Project Manager: HM Rollins

 Reported:
 10/21/10 11:57

B-2 Soil
1009176-08 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Chromium	59.5	0.493	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 12:52	SW 6010B	
Zinc	9950	9.85	"	10	"	SCH	"	09/30/10 16:26	"	E-01

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 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/21/10 11:57

B-3 Soil
1009176-09 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Arsenic	18.9	2.47	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 12:58	SW 6010B	
Barium	95.0	0.493	"	"	"	SCH	"	"	"	
Chromium	59.4	0.493	"	"	"	SCH	"	"	"	
Lead	443	2.47	"	"	"	SCH	"	"	"	
Zinc	22200	9.87	"	10	"	SCH	"	09/30/10 16:28	"	E-01



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HM Rollins Company
PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM Rollins

Reported:
10/21/10 11:57

C-1 Soil

1009176-10 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Barium	133	0.485	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 13:01	SW 6010B	

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PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM Rollins

Reported:
10/21/10 11:57

C-2 Soil

1009176-11 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Barium	119	0.491	mg/kg	1	0115003	SCH	09/15/10 09:30	09/30/10 13:03	SW 6010B	

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



6500 Sunplex Drive
Ocean Springs, MS 39564
228-875-6420 Phone
228-875-6423 Fax

HM Rollins Company
PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM Rollins

Reported:
10/21/10 11:57

B-1 Soil DUP

1009176-12 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Zinc	33400	10.0	mg/kg	10	OJ20004	SCH	10/11/10 10:00	10/19/10 15:49	SW 6010B	E-01

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228-875-6420 Phone
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HM Rollins Company
PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM Rollins

Reported:
10/21/10 11:57

B-2 Soil DUP

1009176-13 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Zinc	8290	10.0	mg/kg	10	OJ20004	SCH	10/11/10 10:00	10/19/10 15:51	SW 6010B	E-01

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228-875-6420 Phone
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HM Rollins Company
PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM Rollins

Reported:
10/21/10 11:57

B-3 Soil DUP

1009176-14 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Metals										DW
Zinc	23100	10.0	mg/kg	10	OJ20004	SCH	10/11/10 10:00	10/19/10 15:55	SW 6010B	E-01

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HM Rollins Company
 PO Box 3471
 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/21/10 11:57

Metals - Quality Control

Analyte	Result	MRL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch 0115003 - EPA 3050B

Blank (0115003-BLK1)

Prepared: 09/15/10 Analyzed: 09/30/10

Arsenic	ND	2.50	mg/kg
Barium	ND	0.500	"
Chromium	ND	0.500	"
Copper	ND	0.500	"
Lead	ND	2.50	"
Zinc	ND	1.00	"

LCS (0115003-BS1)

Prepared: 09/15/10 Analyzed: 09/30/10

Arsenic	9.94	2.50	mg/kg	10.0	99.4	85-115	20
Barium	9.78	0.500	"	10.0	97.8	85-115	20
Chromium	11.0	0.500	"	10.0	110	85-115	20
Copper	10.7	0.500	"	10.0	107	85-115	20
Lead	10.8	2.50	"	10.0	108	85-115	20
Zinc	9.72	1.00	"	10.0	97.2	85-115	20

LCS Dup (0115003-BSD1)

Prepared: 09/15/10 Analyzed: 09/30/10

Arsenic	10.4	2.50	mg/kg	10.0	104	85-115	4.34	20
Barium	10.5	0.500	"	10.0	105	85-115	6.82	20
Chromium	11.3	0.500	"	10.0	113	85-115	2.15	20
Copper	10.8	0.500	"	10.0	108	85-115	1.10	20
Lead	10.6	2.50	"	10.0	106	85-115	2.50	20
Zinc	9.85	1.00	"	10.0	98.5	85-115	1.34	20

Duplicate (0115003-DUP1)

Source: 1009176-04

Prepared: 09/15/10 Analyzed: 10/05/10

DW

Arsenic	111	2.37	mg/kg	96.7	13.5	20	QD-10
Barium	262	0.475	"	310	16.6	20	QD-10
Lead	125	2.37	"	125	0.102	20	QD-10

HM Rollins Company
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 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/21/10 11:57

Metals - Quality Control

Analyte	Result	MRL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 0115003 - EPA 3050B

Matrix Spike (0115003-MS1)		Source: 1009176-04			Prepared: 09/15/10 Analyzed: 10/05/10					DW
Chromium	15.3	0.475	mg/kg	9.50	5.26	106	75-125		20	
Copper	58.0	0.475	"	9.50	45.9	127	75-125		20	QM-4X
Zinc	29.0	0.950	"	9.50	22.3	70.3	75-125		20	QM-05
Matrix Spike Dup (0115003-MSD1)		Source: 1009176-04			Prepared: 09/15/10 Analyzed: 10/05/10					DW
Chromium	14.7	0.474	mg/kg	9.47	5.26	100	75-125	3.75	20	
Copper	52.2	0.474	"	9.47	45.9	66.3	75-125	10.5	20	QM-4X
Zinc	26.4	0.947	"	9.47	22.3	42.8	75-125	9.45	20	QM-05

Batch 0115004 - EPA 3050B

Blank (0115004-BLK1)		Prepared: 09/15/10 Analyzed: 10/05/10								
Copper	ND	0.500	ug/wipe							
Lead	ND	2.50	"							
Zinc	ND	1.00	"							
LCS (0115004-BS1)		Prepared: 09/15/10 Analyzed: 10/05/10								
Copper	10.5	0.500	ug/wipe	10.0		105	85-115		20	
Lead	10.4	2.50	"	10.0		104	85-115		20	
Zinc	8.85	1.00	"	10.0		88.5	85-115		20	
LCS Dup (0115004-BSD1)		Prepared: 09/15/10 Analyzed: 10/05/10								
Copper	10.6	0.500	ug/wipe	10.0		106	85-115	0.520	20	
Lead	10.8	2.50	"	10.0		108	85-115	3.45	20	
Zinc	8.98	1.00	"	10.0		89.8	85-115	1.54	20	

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 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/21/10 11:57

Metals - Quality Control

Analyte	Result	MRL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch 0J20004 - EPA 3050B

Duplicate (0J20004-DUP1)	Source: 1009176-13			Prepared: 10/11/10 Analyzed: 10/19/10						DW
Zinc	7500	10.0	mg/kg		8290			10.0	20	E-01

HM Rollins Company
 PO Box 3471
 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/21/10 11:57

Laboratory Accreditations/Certifications

Code	Description	Number	Expires
C01	La Environmental Lab Accreditation Program	01960	06/30/2011
C02	National Environmental Lab Accreditation Program		06/30/2011
C03	Ms Dept of Health (Coliform)	MS00007	11/25/2010
C04	Ms Dept of Health (Drinking Water Certificate)	MS00021-2009	12/31/2010
C05	Ms DEQ Lead Firm Certification	PBF-00000028	10/08/2010
C06	MsDEQ Asbestos Inspector : C.D. Bingham	ABI-00001348	04/22/2011
C07	MsDEQ Air Monitor : C.D. Bingham	AM-011572	04/23/2011
C08	MsDEQ Asbestos Inspector: C. W. Meins	ABI-00001821	09/04/2010
C09	MsDEQ Air Monitor : C.W. Meins	AM-011189	04/23/2011
C10	MsDEQ Asbestos Inspector : C.E.Harris	ABI-00002378	01/14/2011
C11	MsDEQ Air Monitor : C.E. Harris	ABM-00002015	10/30/2010
C12	MsDEQ Asbestos Inspector : H.P. Howell	ABI-00001345	04/22/2011
C13	MsDEQ Air Monitor: H.P. Howell	ABM-00001344	04/23/2011

Report Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the minimum reporting limit
NR	Not Reported
RPD	Relative Percent Difference
ICV	Initial Calibration Verfiication
CCV	Continuing Calibration Verification Standard
SSV	Secondary Source Verification Standard
LCS	Lab Control Spike - Lab matrix prepared with known concentration of analyte/s of interest analyzed by method.
MS	Matrix Spike - Sample prepared with known concentration of analyte/s of interest analyzed by method.
MSD	Matrix Spike Duplicate - Duplicate sample prepared with known concentration of anlyte/s of interest analyzed by method.
MRL	Minimum Reporting Limit
%REC	Percentage Recovery of known concentration added to matrix
Batch	Group of samples prepared for analysis not to exceed 20 samples.
Matrix	Material containing analyte/s of interest
Surrogate	Analyte added to sample to determine extraction efficiency of method.

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

HM Rollins Company
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 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/21/10 11:57

1009176

 H. M. ROLLINS CO., INC., P.O. BOX 3471, GULFPORT, MS 39505
 ANALYSIS REQUEST AND CHAIN-OF-CUSTODY DOCUMENT

Site: HOOD PACKAGING CORPORATION Valdosta, Georgia			ANALYZE FOR: (SW-846 OR EQUIVALENT METHODS)									
DATE			TIME	SAMPLE DESCRIPTION	NUMBER OF CONTAINERS	Arsenic	Lead	Barium	Copper	Zinc	Chromium	REMARKS (PURGE VOLUME, COLOR, ODOR, etc.)
9/9/10			8:50 am	D-1 Soil	1		✓		✓	✓		Call Martin Rollins before beginning wipe of 6"x6" on concrete slab - report metal levels
9/9/10			9:05 am	D-2 Glass fiber wipe sample	1		✓		✓	✓		
9/9/10			9:40 am	D-3 Soil	1		✓		✓	✓		
9/9/10			10:56 am	A-1 Soil	1					✓		
9/9/10			11:25 am	A-2 Soil	1					✓		
9/9/10			11:35 am	A-3 Soil	1	✓	✓		✓	✓		
9/9/10			12:10 pm	B-1 Soil	1					✓	✓	
9/9/10			12:35 pm	B-2 Soil	1					✓	✓	
9/9/10			12:45 pm	B-3 Soil	1	✓	✓	✓		✓	✓	
9/9/10			1:30 pm	C-1 Soil	1			✓				
9/9/10			1:45 pm	C-2 Soil	1		✓					

ADDITIONAL REMARKS OR INSTRUCTIONS: Report wipe sample as total weight of metal, by method in micrograms

RELINQUISHED BY: <i>HM Rollins</i>	RELINQUISHED BY:	LABORATORY:
TIME/DATE: 2:52 pm 9/10/10	TIME/DATE:	
RECEIVED BY: <i>Paul Gattala</i>	RECEIVED BY:	LAB COMMENTS:
TIME/DATE: 2:52 9/10/10	TIME/DATE:	

SOIL - COFC.XLS



6500 Sunplex Drive
Ocean Springs, MS 39564
228.875.6420 Phone
228.875.6423 Fax

October 12, 2010

HM Rollins

Work Order # : 1009179

HM Rollins Company
PO Box 3471
Gulfport, MS 39505

Purchase Order #:

RE: Hood Packaging Corporation @ Valdosta, GA

Enclosed are Micro-Methods Laboratory, Inc. results of analyses performed on samples received
09/10/10 14:52. If you have any questions concerning this report, please feel free to contact the office.

Sincerely,

Harry P. Howell

President
Micro-Methods Laboratory, Inc.

DISCLAIMER

The results only relate to the items or the sample and/or samples received by the laboratory. This report shall not be reproduced except in full, without the approval of the laboratory. All test methods performed meet the requirements of NELAC 2003 Standards. Any variances and/or deviations specific to this analytical report are referenced in the lab report using qualifiers and detailed explanations found in the case narrative.

HM Rollins Company
 PO Box 3471
 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/12/10 07:22

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date/Time Sampled	Sampled by	Date/Time Received
A-4 Purple Rock	1009179-01	Solid	09/09/10 11:00	HM Rollins	09/10/10 14:52
A-5 Yellow Rock	1009179-02	Solid	09/09/10 11:00	HM Rollins	09/10/10 14:52

Sample Receipt Conditions

Date/Time Received: 9/10/2010 2:52:00PM

Shipped by: Client Delivery

Received by: Paul D. Gatchell

Submitted by: HM Rollins

Date/Time Logged: 9/13/2010 2:08:00PM

Logged by: Paul D. Gatchell

 Cooler ID: Default Cooler

Receipt Temperature: _____

Custody Seals No

Received on Ice No

Containers Intact Yes

No Ice, Short Trip No

COC/Labels Agree Yes

Obvious Contamination No

Labels Complete Yes

Rush to meet HT No

COC Complete Yes



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HM Rollins Company
PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM Rollins

Reported:
10/12/10 07:22

CASE NARRATIVE SUMMARY

All reported results are within Micro-Methods Laboratory, Inc. defined laboratory quality control objectives unless detailed in narrative summary or identified as qualifications. NOTE: All results listed on this report are calculated on a wet weight basis (as received by the laboratory) unless otherwise noted in the analysis qualification sections.

Summary Comments:

Metals Technician Comments:

Sample results are approximated and for client review only. No QC results reported. SCH

Qualification: *No Data Qualification*

Analyte & Samples(s) Qualified: *None*

HM Rollins Company
 PO Box 3471
 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/12/10 07:22

A-4 Purple Rock
1009179-01 (Solid)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
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Classical Chemistry Parameters

Total Kjeldahl Nitrogen	201	0.76	mg/kg	1	0114027	DLW	09/14/10 08:05	09/14/10 08:05	SM 4500-Norg B	
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Metals

Aluminum	545	2.26	mg/kg	1	0115005	SCH	09/15/10 09:30	10/08/10 10:30	SW 6010B	
Sulfur	2870	2.26	"	"	"	SCH	"	10/04/10 11:24	"	
Arsenic	133	2.26	"	"	"	SCH	"	10/08/10 10:30	"	
Barium	1550	0.452	"	"	"	SCH	"	"	"	
Calcium	117	2.26	"	"	"	SCH	"	"	"	
Copper	313	0.452	"	"	"	SCH	"	"	"	
Iron	181000	113	"	50	"	SCH	"	10/08/10 10:53	"	
Lead	1500	2.26	"	1	"	SCH	"	10/08/10 10:30	"	
Potassium	529	4.52	"	"	"	SCH	"	"	"	
Sodium	152	4.52	"	"	"	SCH	"	"	"	
Titanium	101	2.26	"	"	"	SCH	"	"	"	
Zinc	110	0.904	"	"	"	SCH	"	"	"	

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 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/12/10 07:22

A-5 Yellow Rock
1009179-02 (Solid)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Notes
Classical Chemistry Parameters										
Total Kjeldahl Nitrogen	154	0.76	mg/kg	1	0114027	DLW	09/14/10 08:05	09/14/10 08:05	SM 4500-Norg B	
Metals										
Aluminum	896	2.18	mg/kg	1	0115005	SCH	09/15/10 09:30	10/08/10 10:41	SW 6010B	
Sulfur	3010	2.18	"	"	"	SCH	"	10/04/10 11:26	"	
Barium	1780	0.436	"	"	"	SCH	"	10/08/10 10:41	"	
Iron	18200	54.6	"	25	"	SCH	"	10/08/10 10:56	"	
Lead	1000	2.18	"	1	"	SCH	"	10/08/10 10:41	"	
Potassium	682	4.36	"	"	"	SCH	"	"	"	
Sodium	208	4.36	"	"	"	SCH	"	"	"	
Titanium	196	2.18	"	"	"	SCH	"	"	"	
Phosphorus	470	2.18	"	"	"	SCH	"	"	"	

HM Rollins Company
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 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/12/10 07:22

Classical Chemistry Parameters - Quality Control

Analyte	Result	MRL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 0114027 - Default Prep GenChem

Blank (0114027-BLK1)						Prepared & Analyzed: 09/14/10				
Total Kjeldahl Nitrogen	ND	0.76	mg/kg							
LCS (0114027-BS1)						Prepared & Analyzed: 09/14/10				
Total Kjeldahl Nitrogen	1.02		mg/kg	1.00		102	75-125		30	
LCS Dup (0114027-BSD1)						Prepared & Analyzed: 09/14/10				
Total Kjeldahl Nitrogen	0.92		mg/kg	1.00		92.0	75-125	10.3	30	
Duplicate (0114027-DUP1)						Source: 1009174-03				
						Prepared & Analyzed: 09/14/10				
Total Kjeldahl Nitrogen	384	0.76	mg/kg		359			6.73	30	



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Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM Rollins

Reported:
10/12/10 07:22

Certified Analyses Included in this Report

Analyte	Certification Code
SM 4500-Norg B in Solid	
Total Kjeldahl Nitrogen	C01,C02

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HM Rollins Company
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 Gulfport MS, 39505

 Project: Hood Packaging Corporation @ Valdosta, GA
 Project Number: [none]
 Project Manager: HM Rollins

 Reported:
 10/12/10 07:22

Laboratory Accreditations/Certifications

Code	Description	Number	Expires
C01	La Environmental Lab Accreditation Program	01960	06/30/2011
C02	National Environmental Lab Accreditation Program		06/30/2011
C03	Ms Dept of Health (Coliform)	MS00007	11/25/2010
C04	Ms Dept of Health (Drinking Water Certificate)	MS00021-2009	12/31/2010
C05	Ms DEQ Lead Firm Certification	PBF-00000028	10/08/2010
C06	MsDEQ Asbestos Inspector : C.D. Bingham	ABI-00001348	04/22/2011
C07	MsDEQ Air Monitor : C.D. Bingham	AM-011572	04/23/2011
C08	MsDEQ Asbestos Inspector: C. W. Meins	ABI-00001821	09/04/2010
C09	MsDEQ Air Monitor : C.W. Meins	AM-011189	04/23/2011
C10	MsDEQ Asbestos Inspector : C.E.Harris	ABI-00002378	01/14/2011
C11	MsDEQ Air Monitor : C.E. Harris	ABM-00002015	10/30/2010
C12	MsDEQ Asbestos Inspector : H.P. Howell	ABI-00001345	04/22/2011
C13	MsDEQ Air Monitor: H.P. Howell	ABM-00001344	04/23/2011

Report Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the minimum reporting limit
NR	Not Reported
RPD	Relative Percent Difference
ICV	Initial Calibration Verfiication
CCV	Continuing Calibration Verification Standard
SSV	Secondary Source Verification Standard
LCS	Lab Control Spike - Lab matrix prepared with known concentration of analyte/s of interest analyzed by method.
MS	Matrix Spike - Sample prepared with known concentration of analyte/s of interest analyzed by method.
MSD	Matrix Spike Duplicate - Duplicate sample prepared with known concentration of anlyte/s of interest analyzed by method.
MRL	Minimum Reporting Limit
%REC	Percentage Recovery of known concentration added to matrix
Batch	Group of samples prepared for analysis not to exceed 20 samples.
Matrix	Material containing analyte/s of interest
Surrogate	Analyte added to sample to determine extraction efficiency of method.

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HM Rollins Company
PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation @ Valdosta, GA
Project Number: [none]
Project Manager: HM Rollins

Reported:
10/12/10 07:22

[illegible]

Appendix B

Hood Packaging Valdez, GA
11/15/16. Traveled to site
& arrived at 14:30
Did general site recon.
Site had been mowed
Identified previously
defined areas of investigation
Sought to identify grid
points so could locate
Large Area 4 (LA4) sampling
points for zinc delineation.
Found point E4 ~ 30' west
of SB-5. From there
located E3, E2, O3, O2.
Used metal detector
to locate. Some rods
had been hit by bush hog.

11/15/16 Continued

Located old sample points

#41 ~ 30' N of Line 2

~ 15' W of Line E

Calling zinc sample LA4-N

#44 ~ 40' S of Line 2

~ 31' E of Line E

Calling zinc sample LA4-E

#43 ~ 32' W of Line E

~ 32' N of Line 4

Calling zinc sample LA4-S

#42 ~ 75' W of Line E

~ 62' N of Line 3

Calling zinc sample LA4-W

New sample west LA4-W 2

75' W of LA4-W

~ 150' W of Line E

~ 62' N of Line 3

Left site at 17:30

11/16/16

14:00 On site to sample
LA4 for zinc delineation

See 11/15/16 notes for sample
locations

LA4-N clear grass from
surface. Dug stainless
soil probe to 24" got 20" heavy
crusted line into clean
stainless pan.

Mixed with
stainless spoon. Removed rocks
Orange silty sand at top.

Balua gray silty sand
some root fragments

Filled 802 glass jar

Took photo Labelled jar

14:15 Lat-Lon by cell phone

30.829431 83.297119

Same as old sample pt. #41

11/16

LA4-E Same as old #44

Brick floor at 7"

Dug hole to brick, cleaned hole, sampled side walls with clean stainless spoon
Dark gray - silty sand - dry
Placed in clean stainless pan
Mixed well - removed most brick fragments

Filled 8 oz glass jar - Labeled
Took photo

Lat Lon 30.829250
83.296952

11/15

Lat Lon of SB-5

30.828736

83.296963

11/16/16

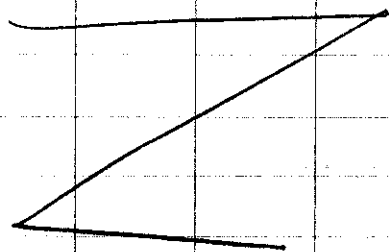
LA4-S Same as old #43

At marked spot found bricks at 5" deep. Moved 2' west
Was able to drive to 24"
Sample recovery ~ 16"

Dug gray sand at tip then
Jan sand then lt gray sand
& dark gray at surface.

Placed in clean SS pan, mixed
with clean SS spoon - placed
in 8 oz glass jar Labeled

LA4-S 1500 30.828869
83.297092 Took photo



11/16/16

LA4-W2 75' west of LA4-W

which was at old #42

Hit brick at 9" deep at several locations. Dug hole to 9"

cleaned hole - sampled from side walls evenly

top to bottom. Placed

in clean SS pan mixed

with clean SS spoon

& placed in 8 oz glass jar

1520 Took photo

Gray sand from surface to 9"

w/ brick fragments, some

root fragments, eliminated

brick fragments from sample

30.829236 83.297540

11/16/16

LA4-W approx location of old #42

Dug hit bricks & debris, broken

like bottle. Tried to drive probe - refused at 10"

Dug hole to 10" cleaned hole and sampled sidewalls.

Gray sand, brick fragments

char. Tried to eliminate

brick fragments & char

Put in clean SS pan, mixed

with clean SS spoon,

Filled 8 oz glass jar

Labeled 15140

30.82939 83.297299

All samples very dry

11/16/16

15:57 at well SB-5

Lock rusted so cut-off

Well cap broken Spider

webs in casing Cap says SB-5

Total depth 13' BTAC

Steel protective casing +
concrete slab sloping to NE

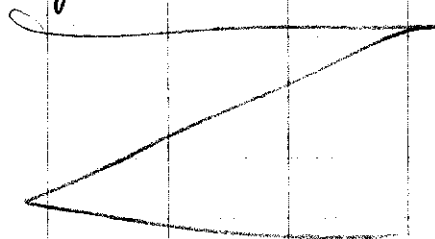
Ran 1/2" pipe to bottom

solid - no silt. Based on

pipe only about 26" of
water in well. Bailed water

to prime pump Pump on

dry



11/16/16

16:20 at well SB-12

Protective casing + slab
have been displaced

Moved slab + could not
find well casing dug 18"
in all directions +
could not find it

went to well SB-6 Cut
off lock. Put pipe down
well - solid bottom - no silt
Very little water. Bailed to
prime pump. Lost section
Casing + slab are slanted
Put new lock on well
Key # 0310

11/16/16

Went to SB-4. Easing is broken off at ground. Will check tomorrow if repairable.

Went to sample ditch. Sampled at River Street on north side. Very little flow. Sample was clear.

Went to sample at bridge in park. Sampled ditch on west side. Unsure if any flow. Water is clear but may have some algae. Back to hotel at 5:45 pm.

11/17/16

At park at 8:00 am.

Cut lock on well SB-13

Bailed dry - water is almost black - took 5 bailers to dry.

Looking for wells SB-8+9 with machete unable to find.

8:15 cut lock on SB-2? No sign of SB-2A. Installed new lock.

Went down trail where sewer line went. Found well on east side. Cut lock. Not marked. Think is well 9A put new lock on.

11/17/16

Used our old survey to attempt to locate other wells from SB-2.

Took us down the sewer trail. It had been recently bush hogged. Located well SB-14 on west side. Lock hasp was broken. Tree had fallen on protective casing. Well had very little water. Bailed dry then sampled. Took 8 bailers to get 2 liters.

Verified well SB-9A

11/17/16

Then located SB-9 by Survey. Cut lock put new lock on.

After much chopping of blackberry bushes located well SB-8 east of sewer right of way - by survey. Cut lock installed new lock.

Marked all well locations with pink tape.

Dug around well SB-2 + located slab of SB-2A 6' east of SB-2. Couldn't find the casing

11/17/16

Went to well SB1 + SBH
location. One well
destroyed - the south one.
Wells not marked, cut back
+ replaced with new.

Went to well SB-4 location
Protective casing + s/s
moved. Found broken
well casing. It is
distorted. Not sure
it can be repaired.

Met Don Selph? Tanya's
husband.

Left site at 12:00

for US





Mailing Address:
PO Box 1410
Ocean Springs, MS
39566-1410

6500 Sunplex Drive
Ocean Springs, MS 39564
228.875.6420 Phone
228.875.6423 Fax

December 06, 2016

Jason Rollins

Work Order # : 1611404

HM Rollins Company
PO Box 3471
Gulfport, MS 39505

Purchase Order #:

RE: Hood Packaging Corporation-Valdosta, GA

Enclosed are Micro-Methods Laboratory, Inc. results of analyses performed on samples received 11/18/16 13:47. If you have any questions concerning this report, please feel free to contact the office.

Sincerely,

A handwritten signature in black ink that reads 'Harry P. Howell'.

Harry P. Howell

President
Micro-Methods Laboratory, Inc.

DISCLAIMER

The results only relate to the items or the sample and/or samples received by the laboratory. This report shall not be reproduced except in full, without the approval of the laboratory. All test methods performed meet the requirements of NELAC 2009 Standards. Any variances and/or deviations specific to this analytical report are referenced in the lab report using qualifiers and detailed explanations found in the case narrative.

HM Rollins Company
 PO Box 3471
 Gulfport MS, 39505

 Project: Hood Packaging Corporation-Valdosta, GA
 Project Number: [none]
 Project Manager: Jason Rollins

 Reported:
 12/06/16 09:06

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date/Time Sampled	Sampled by	Date/Time Received
LA4-N	1611404-01	Soil	11/16/16 14:15	Jason Rollins	11/18/16 13:47
LA4-E	1611404-02	Soil	11/16/16 14:45	Jason Rollins	11/18/16 13:47
LA4-S	1611404-03	Soil	11/16/16 15:00	Jason Rollins	11/18/16 13:47
LA4-W2	1611404-04	Soil	11/16/16 15:20	Jason Rollins	11/18/16 13:47
LA4-W	1611404-05	Soil	11/16/16 15:40	Jason Rollins	11/18/16 13:47
River St. Ditch	1611404-06	Water	11/16/16 17:00	Jason Rollins	11/18/16 13:47
Park Rd. Ditch	1611404-07	Water	11/16/16 17:30	Jason Rollins	11/18/16 13:47
SB-13	1611404-08	Water	11/17/16 08:45	Jason Rollins	11/18/16 13:47
SB-14	1611404-09	Water	11/17/16 10:20	Jason Rollins	11/18/16 13:47

Sample Receipt Conditions

Date/Time Received: 11/18/2016 1:47:00PM

Shipped by: Lab Pick-up

Received by: Sarah E. Tomek

Submitted by: Joaquin R Stallworth

Date/Time Logged: 11/18/2016 2:09:00PM

Logged by: Sarah E. Tomek

Cooler ID: #1111

Receipt Temperature: 5.4 °C

Custody Seals	No
Containers Intact	Yes
COC/Labels Agree	Yes
Labels Complete	Yes
COC Complete	Yes

Received on Ice	Yes
No Ice, Short Trip	No
Obvious Contamination	No
Rush to meet HT	No



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HM Rollins Company
PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

CASE NARRATIVE SUMMARY

All reported results are within Micro-Methods Laboratory, Inc. defined laboratory quality control objectives unless detailed in narrative summary or identified as qualifications. NOTE: All results listed on this report are calculated on a wet weight basis (as received by the laboratory) unless otherwise noted in the analysis qualification sections.

Summary Comments:

Metals Analyst Comments-SCH:

The analyte concentration for Zn is greater than 10 times the spike concentration. Duplicate only reported for this analyte. The QC batch was accepted based on LCS/LCSD and Duplicate recoveries within the acceptance limits.

Qualifiers: *No Data Qualification*

Analyte & Samples(s) Qualified: *None*



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HM Rollins Company
PO Box 3471
Gulfport MS, 39505

Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

LA4-N

1611404-01 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
Metals by EPA 6000 Series Methods ICP-AES										
Zinc	105	2.50	mg/kg	1	6K22015	MMG	11/22/16 08:40	12/02/16 13:04	SW 6010B	



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Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

LA4-E

1611404-02 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
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Metals by EPA 6000 Series Methods ICP-AES

Zinc	1480	2.50	mg/kg	1	6K22015	MMG	11/22/16 08:40	12/02/16 13:14	SW 6010B	
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Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

LA4-S

1611404-03 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
Metals by EPA 6000 Series Methods ICP-AES										
Zinc	491	2.49	mg/kg	1	6K22015	MMG	11/22/16 08:40	12/02/16 13:17	SW 6010B	



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Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

LA4-W2

1611404-04 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
Metals by EPA 6000 Series Methods ICP-AES										
Zinc	224	2.49	mg/kg	1	6K22015	MMG	11/22/16 08:40	12/02/16 13:20	SW 6010B	



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Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

LA4-W

1611404-05 (Soil)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
Metals by EPA 6000 Series Methods ICP-AES										
Zinc	336	2.50	mg/kg	1	6K22015	MMG	11/22/16 08:40	12/02/16 13:23	SW 6010B	



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Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

River St. Ditch

1611404-06 (Water)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
Metals by EPA 200 Series Methods ICP-MS										
Arsenic	0.002	0.002	mg/L	1	6K21045	SCH	11/21/16 09:00	11/30/16 18:19	EPA 200.8	
Lead	0.003	0.001	"	"	"	SCH	"	"	"	
Zinc	ND	0.020	"	"	"	SCH	"	"	"	



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Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

Park Rd. Ditch

1611404-07 (Water)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
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Metals by EPA 200 Series Methods ICP-MS

Arsenic	0.002	0.002	mg/L	1	6K21045	SCH	11/21/16 09:00	11/30/16 18:29	EPA 200.8	
Lead	0.002	0.001	"	"	"	SCH	"	"	"	
Zinc	ND	0.020	"	"	"	SCH	"	"	"	



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Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

SB-13

1611404-08 (Water)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
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Metals by EPA 200 Series Methods ICP-MS

Arsenic	0.170	0.002	mg/L	1	6K21045	SCH	11/21/16 09:00	11/30/16 18:33	EPA 200.8	
Lead	0.095	0.001	"	"	"	SCH	"	"	"	
Zinc	0.197	0.020	"	"	"	SCH	"	"	"	



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Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

SB-14

1611404-09 (Water)

Analyte	Result	MRL	Units	Dil	Batch	Analyst	Date Time Prepared	Date Time Analyzed	Method	Qualifiers
Metals by EPA 200 Series Methods ICP-MS										
Arsenic	0.020	0.002	mg/L	1	6K21045	SCH	11/21/16 09:00	11/30/16 18:36	EPA 200.8	
Lead	0.104	0.001	"	"	"	SCH	"	"	"	
Zinc	0.137	0.020	"	"	"	SCH	"	"	"	

HM Rollins Company
 PO Box 3471
 Gulfport MS, 39505

 Project: Hood Packaging Corporation-Valdosta, GA
 Project Number: [none]
 Project Manager: Jason Rollins

 Reported:
 12/06/16 09:06

Metals by EPA 6000 Series Methods ICP-AES - Quality Control

Analyte	Result	MRL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifiers
Batch 6K22015 - EPA 3050B										
Blank (6K22015-BLK1)					Prepared: 11/22/16 Analyzed: 12/02/16					
Zinc	ND	2.50	mg/kg							
LCS (6K22015-BS1)					Prepared: 11/22/16 Analyzed: 12/02/16					
Zinc	10.3	2.50	mg/kg	10.0		103	85-115			
LCS Dup (6K22015-BSD1)					Prepared: 11/22/16 Analyzed: 12/02/16					
Zinc	9.94	2.50	mg/kg	10.0		99.4	85-115	3.53	20	
Duplicate (6K22015-DUP1)					Source: 1611404-01		Prepared: 11/22/16 Analyzed: 12/02/16			
Zinc	113	2.49	mg/kg		105			7.56	20	

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 Project: Hood Packaging Corporation-Valdosta, GA
 Project Number: [none]
 Project Manager: Jason Rollins

 Reported:
 12/06/16 09:06

Metals by EPA 200 Series Methods ICP-MS - Quality Control

Analyte	Result	MRL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifiers
---------	--------	-----	-------	-------------	---------------	------	-------------	-----	-----------	------------

Batch 6K21045 - EPA 200.2
Blank (6K21045-BLK1)
Prepared: 11/21/16 Analyzed: 11/30/16

Arsenic	ND	0.002	mg/L
Lead	ND	0.001	"
Zinc	ND	0.020	"

LCS (6K21045-BS1)
Prepared: 11/21/16 Analyzed: 11/30/16

Arsenic	0.102	0.002	mg/L	0.100	102	85-115
Lead	0.109	0.001	"	0.100	109	85-115
Zinc	0.115	0.020	"	0.100	115	85-115

LCS Dup (6K21045-BSD1)
Prepared: 11/21/16 Analyzed: 11/30/16

Arsenic	0.102	0.002	mg/L	0.100	102	85-115	0.0121	20
Lead	0.108	0.001	"	0.100	108	85-115	1.28	20
Zinc	0.113	0.020	"	0.100	113	85-115	1.18	20

Matrix Spike (6K21045-MS1)
Source: 1611404-06
Prepared: 11/21/16 Analyzed: 11/30/16

Arsenic	0.105	0.002	mg/L	0.100	0.002	103	70-130
Lead	0.107	0.001	"	0.100	0.003	104	70-130
Zinc	0.117	0.020	"	0.100	0.015	102	70-130

Matrix Spike Dup (6K21045-MSD1)
Source: 1611404-06
Prepared: 11/21/16 Analyzed: 11/30/16

Arsenic	0.104	0.002	mg/L	0.100	0.002	102	70-130	0.239	20
Lead	0.110	0.001	"	0.100	0.003	107	70-130	2.96	20
Zinc	0.116	0.020	"	0.100	0.015	102	70-130	0.130	20

HM Rollins Company
 PO Box 3471
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 Project: Hood Packaging Corporation-Valdosta, GA
 Project Number: [none]
 Project Manager: Jason Rollins

 Reported:
 12/06/16 09:06

Certified Analyses Included in this Report

Analyte	Certification Code
---------	--------------------

EPA 200.8 in Water

Aluminum	C01,C02
Antimony	C01,C02
Arsenic	C01,C02
Barium	C01,C02
Beryllium	C01,C02
Boron	C01,C02
Cadmium	C01,C02
Chromium	C01,C02
Cobalt	C01,C02
Copper	C01,C02
Iron	C01,C02
Lead	C01,C02
Manganese	C01,C02
Molybdenum	C01,C02
Nickel	C01,C02
Selenium	C01,C02
Silver	C01,C02
Strontium	C01,C02
Thallium	C01,C02
Titanium	C01,C02
Vanadium	C01,C02
Zinc	C01,C02
Calcium	C01,C02
Magnesium	C01,C02
Potassium	C01,C02
Sodium	C01,C02
Tin	C01,C02

SW 6010B in Soil

Aluminum	C01,C02
Antimony	C01,C02
Arsenic	C01,C02
Barium	C01,C02
Beryllium	C01,C02
Boron	C01,C02
Cadmium	C01,C02
Calcium	C01,C02
Chromium	C01,C02
Cobalt	C01,C02
Copper	C01,C02
Iron	C01,C02
Lead	C01,C02

HM Rollins Company
PO Box 3471
Gulfport MS, 39505Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins**Reported:**
12/06/16 09:06

Magnesium	C01,C02
Manganese	C01,C02
Molybdenum	C01,C02
Nickel	C01,C02
Potassium	C01,C02
Selenium	C01,C02
Silver	C01,C02
Sodium	C01,C02
Strontium	C01,C02
Thallium	C01,C02
Tin	C01,C02
Titanium	C01,C02
Vanadium	C01,C02
Zinc	C01,C02
Phosphorus	C01,C02

HM Rollins Company
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 Project: Hood Packaging Corporation-Valdosta, GA
 Project Number: [none]
 Project Manager: Jason Rollins

 Reported:
 12/06/16 09:06

Laboratory Accreditations/Certifications

Code	Description	Number	Expires
C01	La Environmental Lab Accreditation Program	01960	06/30/2017
C02	National Environmental Lab Accreditation Program	TNI01397	06/30/2017
C03	Ms Dept of Health (Coliform)	MS00021	12/31/2016
C04	Ms Dept of Health (Drinking Water Certificate)	MS00021	12/31/2016
C05	Ms DEQ Lead Firm Certification	PBF-00000028	10/16/2017
C06	MsDEQ Asbestos Inspector : C.D. Bingham	ABI-00001348	03/10/2017
C07	MsDEQ Air Monitor : C.D. Bingham	AM-011572	04/22/2017
C08	MsDEQ Asbestos Inspector: C. W. Meins	ABI-00001821	09/29/2017
C09	MsDEQ Air Monitor : C.W. Meins	AM-011189	04/22/2017
C12	MsDEQ Asbestos Inspector : H.P. Howell	ABI-00001345	03/10/2017
C14	MsDEQ Lead Paint Inspector : C.D. Bingham	PBI-00003690	03/18/2017
C15	MsDEQ Lead Paint Inspector : C.W. Meins	PBI-00001740	03/18/2017

Report Definitions

TNC	Too Numerous To Count
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the minimum reporting limit
NR	Not Reported
RPD	Relative Percent Difference
ICV	Initial Calibration Verification
CCV	Continuing Calibration Verification Standard
SSV	Secondary Source Verification Standard
LCS	Lab Control Spike - Lab matrix prepared with known concentration of analyte/s of interest analyzed by method.
MS	Matrix Spike - Sample prepared with known concentration of analyte/s of interest analyzed by method.
MSD	Matrix Spike Duplicate - Duplicate sample prepared with known concentration of analyte/s of interest analyzed by method.
MRL	Minimum Reporting Limit
%REC	Percentage Recovery of known concentration added to matrix
Batch	Group of samples prepared for analysis not to exceed 20 samples.
Matrix	Material containing analyte/s of interest
Surrogate	Analyte added to sample to determine extraction efficiency of method.



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Gulfport MS, 39505

Project: Hood Packaging Corporation-Valdosta, GA
Project Number: [none]
Project Manager: Jason Rollins

Reported:
12/06/16 09:06

Analyst Initials Key

<u>FullName</u>	<u>Initials</u>
Barbara K. McMillan	BKM
Michelle M Gallegos	MMG
Sarah E. Tomek	SET
Samantha C. Hall	SCH
Teresa Meins	TKM
Tina Tomek	TPT

Issue Date: 7/18/11	Micro-Methods Laboratory Log-In Checklist	DCN: F207
Implementation Date: 7/18/11		Date Revised: 7-18-11
		Revision: 4

Client HM Rollins WO 1611404 Shipped By JRS
 Date/Time Received 11/18/10 1347 Unpacked/Checked By ST

Cooler ID	Ice Present Yes/No	Temperature	Thermometer ID	Custody Sealed Yes/No	Custody Seal Intact Yes/No
#1111	<u>yes</u>	<u>5.4°C</u>	<u>T#3</u>	<u>no</u>	<u>n/a</u>

If not iced, were samples received within one hour of collection? Yes ___ No ___ N/A X
 Temperature Blank Used Yes ___ No X If not, temperature taken from cooler ___ or bottle X
 Multi Cooler shipment: ID of samples in coolers that exceed 6°C _____

Custody Seals on Bottles Present Yes ___ No X
 Containers Intact Yes X No ___
 Proper Containers for Requested Analysis Yes X No ___

Correct Preservation Used for All Samples Yes X No ___
 Adequate Sample for Analysis Requested Yes X No ___

Volatile Vials Headspace Greater than 6mm in Diameter Yes ___ No ___ N/A X

Chain of Custody Form Included Yes X No ___
 Chain of Custody Form Complete Yes X No ___
 Chain of Custody Form Properly Relinquished Yes X No ___
 Field Sheets/Special Instructions Included Yes ___ No ___ N/A X
 Samples Missing on COC or From Cooler Yes ___ No X
 Sample Container Labels Match COC Yes X No ___

Samples Received Within Holding Time Yes X No ___
 Dept. Manager Notified of Rush/Short Holding Times Yes ___ No ___ N/A X

Does work order meet Micro Methods sample acceptance criteria Yes X No ___
 Note: Samples that do not meet acceptance criteria must be documented in the Sample Rejection Log.

Client Contacted _____ Contacted By _____ Date/Time _____

Client Instructions: Cancel Work Order _____
 Proceed with Work Order _____ (Data will be qualified)

Comments: _____

Controlled Document