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May 7, 2020

Mr. Jim Sliwinski
Unit Coordinator
Remedial Sites Unit 3
Georgia Environmental Protection Division
Land Protection Branch
2 Martin Luther King, Jr. Drive SE, Suite 1054
Atlanta, Georgia 30334

Re: Response to Comments dated April 30, 2020
Groundwater Monitoring Plan
OSP, LLC (Anvil) Facility, Statesboro, Bulloch Co., Georgia
Consent Order No. EPD-HW-1562
EPA ID No. GAD065330151

Dear Mr. Sliwinski:

OSP, LLC (OSP) has prepared this response to the Georgia Environmental Protection Division (EPD) April 30, 2020 comment letter on the Groundwater Monitoring Plan (GWMP), dated August 29, 2019, revised April 1, 2020 for the former Anvil facility (Site) located on Clito Road in Statesboro, Bulloch County, Georgia.

GAEPD Comments and OSP Responses

Comment 1: For clarification, the groundwater sampling program will continue at the site until the monitoring comparison criteria is achieved. At the conclusion of the three-year sampling period, OSP will submit groundwater trend data to EPD for review and evaluation. On the "If a statistically significant increase is confirmed", EPD recommends performing two additional semiannual groundwater sampling events on the selected wells.

OSP Response – The last two sentences of the second paragraph under Section 4.0 have been revised as follows: "If a statistically significant increase is confirmed, two additional semi-annual groundwater sampling events will be conducted to include monitoring wells MW-1, MW-12, MW-13 and MW-16. The results of the additional sampling events will be evaluated, and a meeting held with EPD to determine if the groundwater monitoring network should be expanded."

Comment 2: EPD agrees with OSP's response in reference to the boundary well MW-9.

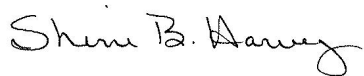
OSP Response – No response required.

Comment 3: EPD requests that the language regarding the residual contamination evaluation be inserted into the GWMP and not the UEC. If there are changes to the groundwater evaluation, it would be simpler to change/amend the GWMP then to modify the UEC.

OSP Response –Section 4 has been revised to include the following: “Once the Uniform Environmental Covenant (UEC) is in place, if OSP or a future property owner wants to terminate the UEC, the groundwater monitoring wells in the former UST area will be sampled and analyzed to confirm that there is no residual contamination above the EPD-approved groundwater monitoring comparison criteria remaining at the site.”

We appreciate your review and expeditious approval of the revised GWMP. If you have any questions regarding our Response to Comments or the project in general, please contact the undersigned at (404) 782-5165.

Sincerely,



Sherri B. Harvey, PE
Sr. Mgr., Environmental and Sustainability

ATTACHMENTS

1. Revised Cover page of the Groundwater Monitoring Plan
2. Revised page 7 of the Groundwater Monitoring Plan

Instructions:

- Remove the existing Cover page and insert the revised Cover page into the Groundwater Monitoring Plan
 - Remove the existing page 7 and insert the revised page 7 into the Groundwater Monitoring Plan
-

GROUNDWATER MONITORING PLAN

OSP, LLC
STATESBORO, GEORGIA
EPA ID No. GAD065330151

PREPARED FOR:

OSP, LLC
DUNWOODY, GEORGIA

PREPARED BY:

EarthCon Consultants, Inc.
1880 West Oak Parkway
Marietta, Georgia 30062
(770) 973-2100

AUGUST 2019
Revised May 2020

4.0 REPORTING

A Groundwater Monitoring Report (GMR) will be prepared annually and submitted to EPD for review. The GMR will include a summary of the field activities, potentiometric surface map showing groundwater flow direction, a summary table showing analytical results compared to groundwater monitoring comparison criteria and the laboratory analytical report. After the 3rd groundwater sampling event, a Groundwater Summary Report will be prepared and submitted. The Groundwater Summary Report will include a summary of the groundwater analytical data compared to the EPD-approved groundwater monitoring comparison criteria (provided in Table 4), updated potentiometric surface map, and a groundwater plume map.

It is anticipated that three years of groundwater sampling will adequately demonstrate that impacted shallow groundwater is not migrating off-Site. At the conclusion of the three-year groundwater sampling program, trends will be prepared using the Mann-Kendall Trend Test for detected constituents to confirm that the groundwater plume continues to be stable and/or decreasing. If a statistically significant increase does not exist, the groundwater sampling program will be evaluated, and OSP, LLC will propose any recommended changes to the program to be reviewed by EPD for its approval. If a statistically significant increase is confirmed, two additional semi-annual groundwater sampling events will be conducted to include monitoring wells MW-1, MW-12, MW-13 and MW-16. The results of the additional sampling events will be evaluated, and a meeting held with EPD to determine if the groundwater monitoring network should be expanded.

Should analytical results indicate detectable concentrations above the EPD-approved groundwater monitoring comparison criteria in boundary well MW-9, a confirmation sample will be collected to verify the results. If concentrations above the EPD-approved groundwater monitoring comparison criteria are confirmed, corrective actions for groundwater will be evaluated. A Corrective Action Plan will be developed and implemented with EPD's approval.

Once the Uniform Environmental Covenant (UEC) is in place, if OSP or a future property owner wants to terminate the UEC, the groundwater monitoring wells in the former UST area will be sampled and analyzed to confirm that there is no residual contamination above the EPD-approved groundwater monitoring comparison criteria remaining at the site.

GROUNDWATER MONITORING PLAN

OSP, LLC
STATESBORO, GEORGIA
EPA ID No. GAD065330151

PREPARED FOR:

OSP, LLC
DUNWOODY, GEORGIA

PREPARED BY:

EarthCon Consultants, Inc.
1880 West Oak Parkway
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(770) 973-2100

AUGUST 2019
Revised June 2020

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1.0 INTRODUCTION

EarthCon Consultants, Inc. (EarthCon), on behalf of OSP, LLC¹, has prepared this Groundwater Monitoring Plan (GWMP) for the former International Agile Manufacturing (IAM) foundry (Anvil facility) located at 11021 Clito Road in Statesboro, Bulloch County, Georgia (hereinafter “Site”). OSP, LLC owns the Anvil facility, which is located approximately five miles north of the city limits of Statesboro, Georgia (Figure 1). The facility operated as a foundry from 1968 to 2003 and was demolished in 2017.

Three unregulated 10,000-gallon underground storage tanks (USTs) (Tank Nos. 1, 2, and 3) which contained #2 fuel oil (heating oil) for consumptive use at the facility and one regulated 550-gallon diesel UST (Tank No. 6) were located in one tank pit on the east side of the plant as shown on Figure 2. These tanks were closed by removal in 1989. In a letter dated March 9, 1990, Marlin Gottschalk, Unit Coordinator of EPD’s UST Unit, acknowledged receipt of a letter from the facility documenting soil remediation activities and removal of the regulated diesel tank and the three unregulated fuel oil tanks. This letter further states that EPD believes the soil remediation activities were successful and that “no further action is required”. A copy of this letter, along with other documents associated with the tank closure are provided in Appendix A.

RCRA Facility Investigation (RFI) activities have been ongoing at the Site since 2007. As part of the RFI activities, monitoring wells MW-1 through MW-11 were constructed as shown in Table 1 at locations shown on Figure 2. As described in the *RCRA Facility Investigation Report, Revision 1.0*, dated January 2013 (revised October 2013), naphthalene and 2-methylnaphthalene were detected in shallow groundwater in the northeastern portion of the facility. Based on historic facility information, the source of these constituents in shallow groundwater is likely the three previously removed 10,000-gallon USTs used to store heating oil.

In October 2013, additional soil and shallow groundwater assessment activities were conducted in the area around the location of the former USTs to evaluate the presence and extent of petroleum constituents in soil and shallow groundwater. During the assessment, light non-aqueous phase liquid (LNAPL) was noted to be present in monitoring wells MW-1 and MW-10.

¹ In 2016, Mueller Water Products, Inc. (“MWP”), which owned 100% of Anvil International, LP, transferred the Statesboro property to another wholly-owned MWP subsidiary, OSP, LLC. The obligations associated with the former Statesboro plant, including the EPD consent order, were also effectively transferred to OSP, LLC.

The results of the assessment were presented in the *Former UST Area Assessment Report* (EarthCon, 2014). On March 31, 2015, absorbent socks were placed in both wells to remove the LNAPL. The socks have been replaced on a monthly basis from April 2015 to the present. Currently, there is no LNAPL in these wells or any other Site monitoring well.

The former Anvil facility was demolished in 2017. Following demolition activities, a subsurface investigation of the former UST area was conducted from March to September of 2017. During this investigation, monitoring wells MW-12 through MW-17 were installed and shallow groundwater samples were collected from wells MW-1 through MW-17. The results of the 2017 shallow groundwater investigation indicated the presence of semi-volatile organic compounds (SVOCs) in shallow groundwater samples collected from monitoring wells located in the vicinity and downgradient of the former UST pit. Details of the 2017 subsurface investigation were presented in the *Groundwater Summary Report* (EarthCon, 2018).

In November 2018, shallow groundwater samples were collected from wells MW-1 through MW-17 and analyzed for SVOCs using U.S. Environmental Protection Agency (USEPA) Method 8270D to obtain current shallow groundwater information for use in a risk assessment. Water level measurements collected at that time indicated that the direction of shallow groundwater flow is to the northeast which is consistent with the historical shallow groundwater flow pattern for the Site (Table 2, Figure 3). LNAPL was not observed in any of the Site monitoring wells indicating that LNAPL has been remediated using absorbent socks. The shallow groundwater analytical results from the 2018 sampling event indicated that the highest concentrations of SVOCs were detected at the former UST area in wells MW-10 and MW-15. Detected concentrations decrease downgradient with total SVOCs not detected in downgradient well MW-9 (Table 3, Figure 4).

The Anvil Site is a former industrial facility and future use is expected to remain industrial. Shallow groundwater is not currently used at the Site. However, because the State of Georgia considers all groundwater as a potential source of drinking water, shallow groundwater was quantitatively evaluated for future potable use as presented in the *Baseline Human Health Risk Assessment* (BHHRA) dated March 2019 and revised August 2019. As presented in the BHHRA, potential risk exists for future on-Site industrial workers and hypothetical future on-Site residents exposed via ingestion of drinking water, dermal contact with shallow groundwater, and inhalation of volatiles in groundwater emanating from tapwater use of the shallow groundwater.

OSP plans to address the potential risk to future on-Site receptors with an environmental covenant to prevent non-industrial use of the property and prohibit the use of the shallow groundwater. As shown on Figure 4, the shallow groundwater contamination does not extend off-Site. To address the potential future risk to off-Site residential receptors, groundwater monitoring comparison criteria for constituents in shallow groundwater that could pose an unacceptable risk to potential off-Site receptors were calculated in the BHHRA (Table 4). To evaluate the potential for contaminant migration to an off-Site receptor, groundwater monitoring will be conducted as described in this GWMP which will be incorporated into the environmental covenant.

2.0 GROUNDWATER MONITORING PROGRAM

As described in the BHHRA, eight constituents including 1,1'-biphenyl, 1-methylnaphthalene, 2-methylnaphthalene, 2, 5-dimethylphenol, 3 & 4 methylphenol, dibenzofuran, naphthalene, and toluic acid were identified as chemicals of concern (COCs) for on-Site shallow groundwater. Groundwater monitoring comparison criteria were then calculated for those constituents for use in determining if the constituents were migrating off-Site at concentrations which pose an unacceptable risk.

As shown in Table 3, five of the COCs were detected in shallow groundwater at concentrations which exceeded the groundwater monitoring comparison criteria. These constituents were detected in wells located within and downgradient of the former UST Area (Figure 4). However, concentrations of COCs were not detected in the groundwater sample collected from downgradient well MW-9. To demonstrate that off-Site contaminant migration is not occurring above acceptable levels, the following activities will be conducted:

- **Groundwater Elevation** – On an annual basis, depth to groundwater measurements will be collected from 11 monitoring wells located in and downgradient of the former UST area to confirm the direction of groundwater flow. The wells to be measured include: MW-1, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, and MW-17.
- **LNAPL** – On an annual basis, the 11 monitoring wells located in and downgradient of the former UST area will be gauged to evaluate the presence of LNAPL. The wells to be gauged include: MW-1, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, and MW-17.
- **Groundwater Sampling** – On an annual basis, groundwater samples will be collected from three monitoring wells, one from within the UST Area (MW-10), one downgradient of the UST Area (MW-8) and one from the downgradient property boundary (MW-9). The groundwater samples will be analyzed for the COCs listed in Table 4.

The groundwater monitoring program described above will be conducted annually for a period of three (3) years to evaluate the potential for off-Site migration and support Site closure. Since the groundwater impacts are limited to the former UST area, the Site monitoring wells upgradient and outside of the UST area (MW-2, MW-4, MW-5, MW-6, and MW-7) will be properly abandoned upon approval of this GWMP.

3.0 SAMPLING PROCEDURES

Field activities will be conducted in general accordance with USEPA's Standard Operating Procedures, as updated (USEPA, 2019b).

3.1 *Water Level Measurements*

Prior to each groundwater sampling event, the depth to groundwater and total well depth will be measured with an electronic water level indicator (e.g. Solinst Water Meter 101 or Heron dipper-T or equivalent) from a fixed measuring point marked on the inner casing of monitoring wells MW-1, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, and MW-17. The depth to water and total depth will be measured to the nearest 0.01 foot and recorded in the field book, along with the date and time they were collected. Presence and thickness (if applicable) of LNAPL inside the monitoring wells will also be evaluated using an interface probe.

3.2 *Equipment Calibration*

Equipment used to collect field parameters (i.e., pH, specific conductivity, temperature, turbidity, etc.) during groundwater sample collection, such as multi-parameter meters and turbidimeters, will be calibrated daily in general accordance with USEPA's Operating Procedure for Groundwater Sampling, SESDPROC-301-R3, as updated. Daily calibration data will be recorded in the field book or calibration log form.

3.3 *Well Purging*

The three monitoring wells to be sampled (MW-8, MW-9, and MW-10) will be purged in general accordance with the USEPA's Operating Procedure for Groundwater Sampling, SESDPROC-301-R3, as updated, using a peristaltic pump with dedicated disposable tubing. Latex gloves will be worn while handling the tubing and will be replaced between sampling each well. Each well will be purged using low-flow techniques.

Groundwater quality field parameters including temperature, pH, specific conductance, and turbidity will be measured during purging and immediately prior to sample collection using a calibrated water quality meter. The readings and water level measurements will be recorded on the Groundwater Sampling Record (Appendix B).

The purged groundwater will be placed into a bucket to measure the volume removed from well. Purge water will be containerized for proper disposal following characterization.

3.4 *Sample Collection and Analysis*

Following completion of well purging, groundwater samples will be collected from monitoring wells MW-8, MW-9, and MW-10 using the same equipment used to purge the well. Samples will be collected in laboratory-supplied containers. Each sample container will be labeled with a unique identification, facility name, date, preservative type, and parameters to be analyzed. The

duplicate sample containers will not include well identification or time of collection. The groundwater samples will be analyzed for the site COCs using SVOC analytical method 8270D.

3.5 Quality Assurance / Quality Control

Quality control samples will be collected and labeled with a unique identification to verify that the sample collection and handling process has not compromised the quality of the groundwater samples. Field quality control samples will be prepared the same as regular investigation samples with regard to sample volume, containers, and preservation.

A field duplicate, defined as an additional sample collected from a groundwater monitoring well consecutively to the independent sample, will be collected from one well. Equipment decontamination is not required between the routine and duplicate sample. The field duplicates will be preserved, stored, and transported to the appropriate laboratory for analysis with the environmental samples. Field duplicate samples will be labeled using a unique sample identifier, "duplicate" or "dup", and submitted as a blind sample to the laboratory for analysis of the same parameters as the routine samples. Results of the field duplicate analysis will be used as a check of laboratory precision.

Matrix spike and matrix spike duplicate (MS/MSD) samples will be collected and analyzed by the analytical laboratory to assess the matrix effects on the accuracy of analytical measurements. Duplicate MS samples will be analyzed for each batch of samples. When the MS is performed in duplicate it provides an indication of sample heterogeneity and analytical system precision.

3.6 Sample Shipment

Samples will be transported under chain-of-custody protocols to TestAmerica Laboratories, Inc. in Savannah, Georgia. Prior to sealing the cooler, the sampler will complete and sign the chain-of-custody form with information including facility identification, well and sample identification, date and time of collection, sample matrix, number of containers, signatures of persons in the chain of possession along with dates and times of receiving/release, and the name of the analytical laboratory. A copy of the chain-of-custody form will be included with the final laboratory report, which will be included in each annual groundwater monitoring report.

4.0 REPORTING

A Groundwater Monitoring Report (GMR) will be prepared annually and submitted to EPD for review. The GMR will include a summary of the field activities, potentiometric surface map showing groundwater flow direction, a summary table showing analytical results compared to groundwater monitoring comparison criteria and the laboratory analytical report. After the 3rd groundwater sampling event, a Groundwater Summary Report will be prepared and submitted. The Groundwater Summary Report will include a summary of the groundwater analytical data compared to the EPD-approved groundwater monitoring comparison criteria (provided in Table 4), updated potentiometric surface map, and a groundwater plume map.

It is anticipated that three years of groundwater sampling will adequately demonstrate that impacted shallow groundwater is not migrating off-Site. At the conclusion of the three-year groundwater sampling period, trends will be prepared using the Mann-Kendall Trend Test for detected constituents to confirm that the groundwater plume continues to be stable and/or decreasing. If a statistically significant increase does not exist, the groundwater sampling program will be evaluated, and OSP, LLC will propose any recommended changes to the program to be reviewed by EPD for its approval. If a statistically significant increase is confirmed, two additional semi-annual groundwater sampling events will be conducted to include monitoring wells MW-1, MW-12, MW-13 and MW-16. The results of the additional sampling events will be evaluated, and a meeting held with EPD to determine if the groundwater monitoring network should be expanded.

Should analytical results indicate detectable concentrations above the EPD-approved groundwater monitoring comparison criteria in boundary well MW-9, a confirmation sample will be collected to verify the results. If concentrations above the EPD-approved groundwater monitoring comparison criteria are confirmed, corrective actions for groundwater will be evaluated. A Corrective Action Plan will be developed and implemented with EPD's approval.

Once the Uniform Environmental Covenant (UEC) is in place, if OSP or a future property owner wants to terminate the UEC, the groundwater monitoring wells in the former UST area will be sampled and analyzed to confirm that there is no residual contamination above the EPD-approved groundwater monitoring comparison criteria remaining at the site.

5.0 REFERENCES

- EarthCon, 2019. *Baseline Human Health Risk Assessment*, OSP, LLC Facility, Statesboro, Bulloch, Co., Georgia, USEPA ID. No. GAD065330151, March 2019, Revised August 2019.
- EarthCon, 2018. *Groundwater Summary Report*. OSP, LLC, Statesboro, Georgia, USEPA ID. No. GAD065330151, EarthCon Consultants, Inc., March 2018.
- EarthCon, 2014. *Former UST Area Assessment Report*, Anvil International, LP, Statesboro, Georgia, USEPA ID. No. GAD065330151, May 2014.
- EarthCon, 2013. *RCRA Facility Investigation Report*, Revision 1.0, Anvil International, LP, Statesboro, Georgia, USEPA ID. No. GAD065330151, January 2013 (Revised pages, dated October 2013).
- USEPA, 2019a. Regional Screening Levels. U.S. Environmental Protection Agency. Last updated May 2019. Available on-line at: <https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables>
- USEPA, 2019b. Field Branches Quality System and Technical Procedures, Region 4: Laboratory and Field Operations, Standard Operating Procedures, as updated. Available on-line at: <https://www.epa.gov/region4/sesd/fbqstp/>.

TABLES

Table 1
Monitoring Well Construction Summary
OSP, LLC
Statesboro, Bulloch County, Georgia

| WELL NO. | DATE INSTALLED | COORDINATES | | ELEVATIONS | | WELL DEPTH | TOP OF SCREEN | | BOTTOM OF SCREEN | |
|----------|----------------|-------------|------------|------------|--------|------------|---------------|-----------|------------------|-----------|
| | | Northing | Easting | TOC | Ground | | Depth | Elevation | Depth | Elevation |
| MW-1 | 11/16/07 | 915531.683 | 784381.698 | 232.86 | 233.14 | 30 | 20 | 213.14 | 30 | 203.14 |
| MW-2 | 11/16/07 | 914274.076 | 784376.043 | 233.60 | 231.28 | 27 | 17 | 214.28 | 27 | 204.28 |
| MW-3 | 11/15/07 | 914302.999 | 783572.734 | 235.11 | 235.47 | 26 | 16 | 219.47 | 26 | 209.47 |
| MW-4 | 11/15/07 | 915863.194 | 783886.238 | 235.88 | 233.81 | 28 | 18 | 215.81 | 28 | 205.81 |
| MW-5 | 11/15/07 | 914790.478 | 784179.803 | 235.58 | 233.33 | 25.4 | 15.4 | 217.93 | 25.4 | 207.93 |
| MW-6 | 11/15/07 | 915014.942 | 783734.140 | 238.15 | 235.60 | 25.6 | 15.6 | 220.00 | 25.6 | 210.00 |
| MW-7 | 11/16/07 | 914213.369 | 784018.680 | 237.18 | 234.71 | 20.6 | 10.6 | 224.11 | 20.6 | 214.11 |
| MW-8 | 06/26/09 | 915538.853 | 784330.725 | 236.52 | 233.70 | 25.5 | 15.5 | 218.20 | 25.5 | 208.20 |
| MW-9 | 03/26/12 | 915714.505 | 784522.187 | 231.64 | 229.21 | 30.5 | 20.2 | 209.01 | 30.2 | 199.01 |
| MW-10 | 10/09/13 | 915399.449 | 784140.049 | 238.18 | 235.20 | 20.2 | 10 | 225.20 | 20 | 215.20 |
| MW-11 | 10/09/13 | 915375.902 | 784286.850 | 235.74 | 233.40 | 20.2 | 10 | 223.40 | 20 | 213.40 |
| MW-12 | 03/01/17 | 915518.194 | 784156.980 | 238.15 | 235.10 | 25 | 10 | 225.10 | 25 | 210.10 |
| MW-13 | 03/02/17 | 915378.286 | 784256.133 | 236.86 | 233.90 | 25 | 10 | 223.90 | 25 | 208.90 |
| MW-14 | 03/02/17 | 915322.067 | 784127.219 | 235.13 | 235.41 | 25 | 10 | 225.41 | 25 | 210.41 |
| MW-15 | 03/02/17 | 915405.050 | 784111.683 | 238.41 | 235.35 | 25 | 10 | 225.35 | 25 | 210.35 |
| MW-16 | 08/22/17 | 915692.850 | 784349.547 | 236.07 | 233.19 | 30 | 20 | 213.19 | 30 | 203.19 |
| MW-17 | 08/22/17 | 915414.176 | 784062.688 | 241.61 | 238.70 | 30 | 20 | 218.70 | 30 | 208.70 |

Notes: Elevations reported in feet above mean sea level
 Depths reported in feet below ground surface
 TOC - top of casing
 Survey data provided by James M. Anderson & Associates on 8/25/17

Prepared by: CDN 8/2/19
 Checked by: SBH 8/2/19

Table 2
Groundwater Elevation Data
OSP, LLC
Statesboro, Bulloch County, Georgia

| Well Number | Date Installed | TOC Elevation (ft., msl) | November 26, 2018 | |
|-------------|----------------|--------------------------|----------------------------|----------------------------------|
| | | | Depth to Groundwater (ft.) | Groundwater Elevation (ft., msl) |
| MW-1 | 11/16/07 | 232.86 | 18.23 | 214.63 |
| MW-2 | 11/16/07 | 233.60 | 7.89 | 225.71 |
| MW-3 | 11/15/07 | 235.11 | 7.82 | 227.29 |
| MW-4 | 11/15/07 | 235.88 | 18.94 | 216.94 |
| MW-5 | 11/15/07 | 235.58 | 10.81 | 224.77 |
| MW-6 | 11/15/07 | 238.15 | 9.84 | 228.31 |
| MW-7 | 11/16/07 | 237.18 | 7.20 | 229.98 |
| MW-8 | 06/26/09 | 236.52 | 20.44 | 216.08 |
| MW-9 | 03/26/12 | 231.64 | 18.68 | 212.96 |
| MW-10 | 10/09/13 | 238.18 | 16.77 | 221.41 |
| MW-11 | 10/09/13 | 235.74 | 16.30 | 219.44 |
| MW-12 | 03/02/17 | 238.15 | 19.05 | 219.10 |
| MW-13 | 03/02/17 | 236.86 | 17.30 | 219.56 |
| MW-14 | 03/02/17 | 235.13 | 13.59 | 221.54 |
| MW-15 | 03/02/17 | 238.41 | 17.08 | 221.33 |
| MW-16 | 08/22/17 | 236.07 | 20.95 | 215.12 |
| MW-17 | 08/22/17 | 241.61 | 19.90 | 221.71 |

Notes:

ft - feet

TOC - top of casing

Depths reported in feet below TOC

Elevations reported in feet above mean sea level (msl)

Prepared by: RJT 3/1/2019

Checked by: CDN 8/1/2019

Table 3
Summary of Groundwater Analytical Results, November 2018
 OSP, LLC
 Statesboro, Bulloch County, Georgia

| Sample Location | Sample Date | Detected SVOCs, µg/L | | | | | | | | | | | | | | | |
|--|-------------|----------------------|---------------------|---------------------|---------------------------|-----------------------------------|-----------------------------------|-----------------------------------|--------------|--------------------------|-------------|--------------|-----------|-------------|-----------------------------|------------|--------------|
| | | 1,1'-Biphenyl | 1-Methylnaphthalene | 2-Methylnaphthalene | 2-Methylphenol (o-Cresol) | 2,3-Dimethylphenol ^(A) | 2,5-Dimethylphenol ^(A) | 3 & 4 Methylphenol ^(B) | Acenaphthene | Carbazole ^(C) | Caprolactam | Dibenzofuran | Fluorene | Naphthalene | Phenanthrene ^(C) | Phenol | Toluic Acid* |
| MW-1 | 11/27/18 | 1.3 J | 13 | 17 | <0.86 | <1.4 | <1.2 | <1.3 | 1.2 J | <0.69 | <0.77 | 0.82 J | 2.4 J | 3.6 J | 1.9 J | <0.81 | <4.5 |
| MW-2 | 11/26/18 | <0.56 | <0.69 | <0.8 | <0.92 | <1.4 | <1.2 | <1.3 | <0.78 | <0.73 | <0.81 | <0.81 | <0.99 | <0.72 | <0.79 | <0.86 | <4.7 |
| MW-3 | 11/26/18 | <0.56 | <0.65 | <0.76 | <0.87 | <1.4 | <1.2 | <1.3 | <0.74 | <0.69 | 2.6 J | <0.77 | <0.94 | <0.68 | <0.75 | <0.81 | <4.5 |
| MW-4 | 11/26/18 | <0.56 | <0.68 | <0.79 | <0.91 | <1.4 | <1.2 | <1.3 | <0.77 | <0.72 | <0.81 | <0.81 | <0.98 | <0.71 | <0.78 | <0.85 | <4.7 |
| MW-5 | 11/26/18 | <0.56 | <0.68 | <0.79 | <0.9 | <1.4 | <1.2 | <1.3 | <0.77 | <0.72 | <0.8 | <0.8 | <0.97 | <0.71 | <0.78 | <0.84 | <4.6 |
| MW-6 | 11/26/18 | <0.56 | <0.65 | <0.76 | <0.87 | <1.4 | <1.2 | <1.3 | <0.74 | <0.69 | <0.77 | <0.77 | <0.93 | <0.68 | <0.75 | <0.81 | <4.5 |
| MW-7 | 11/26/18 | <0.56 | <0.65 | <0.76 | <0.87 | <1.4 | <1.2 | <1.3 | <0.74 | <0.69 | 2.2 J | <0.77 | <0.94 | <0.68 | <0.75 | <0.81 | <4.5 |
| MW-8 | 11/27/18 | 1.5 J | 12 | 15 | <0.91 | <1.4 | <4.1 | <1.3 | <0.78 | <0.73 | <0.81 | <0.81 | <0.99 | 6.2 J | 2.1 J | <0.85 | <4.7 |
| MW-9 | 11/27/18 | <0.56 | <0.69 | <0.81 | <0.92 | <1.5 | <1.2 | <1.3 | <0.79 | <0.74 | <0.82 | <0.82 | <1 | <0.73 | <0.8 | <0.86 | <4.8 |
| MW-10 | 11/28/18 | <6 | 46 J | 58 J | 28 J | 21 J | 130 | 520 | <7.8 | <7.3 | <8.1 | <8.1 | <9.9 | 45 J | <7.9 | 47 J | 120 J |
| MW-11 | 11/26/18 | <0.56 | <0.68 | <0.79 | <0.9 | <1.4 | <1.2 | <1.3 | <0.77 | <0.72 | <0.8 | <0.8 | <0.97 | <0.71 | <0.78 | <0.84 | <4.6 |
| MW-12 | 11/27/18 | 8 J | 33 | 51 | <0.87 | <1.4 | <1.2 | <1.3 | 4.1 J | <0.7 | <0.77 | 2.6 J | 6.2 J | 2.8 J | 8 J | <0.81 | <4.5 |
| MW-13 | 11/27/18 | 0.89 J | 2.3 J | 1.9 J | <0.86 | <1.4 | <1.2 | <1.3 | <0.74 | <0.69 | <0.76 | <0.76 | <0.93 | <0.68 | 1.1 J | <0.8 | <4.5 |
| MW-14 | 11/27/18 | <0.56 | <0.65 | <0.75 | <0.86 | <1.4 | <1.2 | <1.3 | <0.74 | <0.69 | <0.76 | <0.76 | <0.93 | <0.68 | <0.74 | <0.8 | <4.5 |
| MW-15 | 11/27/18 | 18 J | 120 | 170 | <0.92 | <1.4 | <1.2 | <1.3 | 7.4 J | 3 J | <0.81 | 4.4 J | 9.3 J | 90 | 10 | <0.85 | <4.7 |
| MW-16 | 11/27/18 | 2 J | 15 | 20 | <0.9 | <1.4 | <1.2 | <1.3 | 1.3 J | <0.72 | <0.8 | 1.2 J | 3.2 J | 3.9 J | 4.3 J | <0.84 | <4.7 |
| MW-17 | 11/27/18 | <0.57 | <0.65 | <0.76 | <0.87 | <1.4 | <1.2 | <1.3 | <0.74 | <0.69 | <0.77 | <0.77 | <0.94 | <0.68 | <0.75 | <0.81 | <4.5 |
| Tapwater RSL (µg/L) | | 0.083 | 1.1 | 3.6 | 93 | 36 | 36 | 93 | 53 | 12 | 990 | 0.79 | 29 | 0.17 | 12 | 580 | 9 |
| Groundwater Monitoring Comparison Criteria (µg/L) | | 49 | 13 | 40 | NC | NC | 201 | 502 | NC | NC | NC | 10 | NC | 2 | NC | NC | 50 |

Notes:
 SVOC - Semi-Volatile Organic Compound
 µg/L - microgram per liter
 J - estimated concentration
 < - Indicates the constituent was not detected above the specified method detection limit.
 RSL - Regional Screening Level (USEPA, May 2019)
 (A) Screening levels for 2,3-dimethylphenol and 2,5-dimethylphenol are not available. USEPA Region 4 selects 2,4-dimethylphenol as an acceptable surrogate.
 (B) Screening level for 3 & 4 methylphenol (o,p-cresol) is not available. USEPA Region 4 selects 3-methylphenol (m-cresol) as an acceptable surrogate.
 (C) Screening levels for acenaphthalene, carbazole, and phenanthrene are not available. USEPA Region 4 selects pyrene as an acceptable surrogate.
 * Toluic acid may not be a site-related constituent and has not been previously reported in any monitoring well at the facility.

Prepared by: CDN 8/22/19
 Checked by: SBH 8/26/19

Bold - Detected value shown exceeds tapwater RSL established at a target cancer risk of 1E-06 and THQ of 0.1
Bold & Shaded - Detected value shown exceeds Groundwater Monitoring Comparison Criteria established for the residential exposure scenario
 NC - value not calculated as constituent concentration does not exceed tapwater RSL at any location

Table 4
Groundwater Monitoring Comparison Criteria
OSP, LLC
Statesboro, Bulloch County, Georgia

| Site COCs | Monitoring Comparison Criteria (µg/L) |
|---------------------|---------------------------------------|
| 1,1'-Biphenyl | 49 |
| 1-Methylnaphthalene | 13 |
| 2-Methylnaphthalene | 40 |
| 2,5-Dimethylphenol | 201 |
| 3 & 4 Methylphenol | 502 |
| Dibenzofuran | 10 |
| Naphthalene | 2 |
| Toluic Acid | 50 |

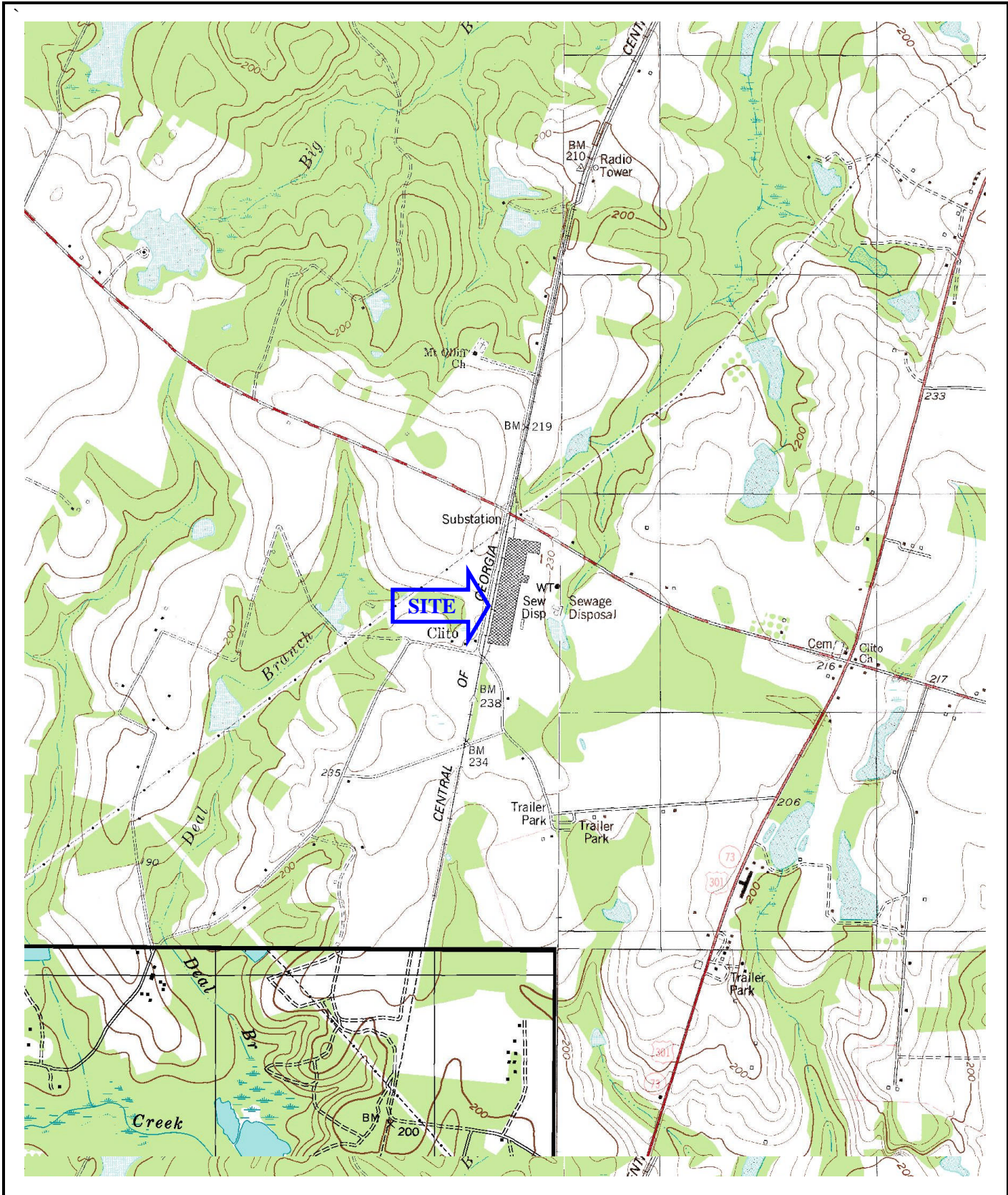
Notes:

COC - Chemicals of Concern (identified for residential exposure scenario)

µg/L - micrograms per liter

Monitoring Program includes sampling of wells MW-8, MW-9, MW-10

FIGURES



OSP, LLC
 11021 Clito Road
 Statesboro, Bulloch County, GA

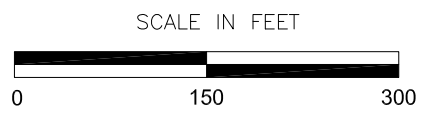
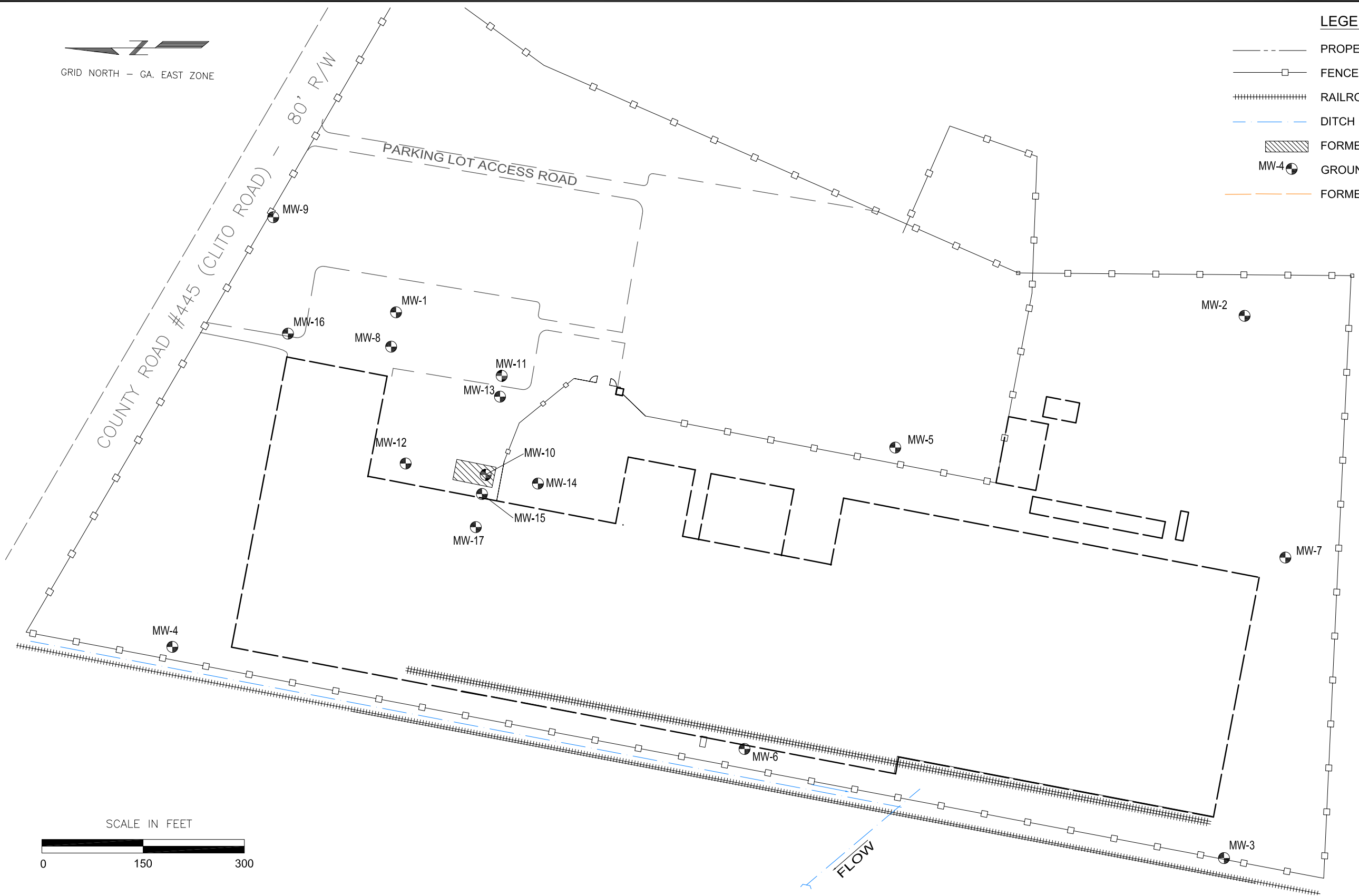
EARTHCON®
 EarthCon Consultants, Inc.
 1880 WEST OAK PKWY, BLDG 100, STE 106,
 MARIETTA, GA, 30062

SITE LOCATION MAP
 Scale: 1"=833'
 Figure 1

Source: United States Geological Survey, 7.5-min. series Topographic Maps for the Hopeulikit, Dover, Statesboro and Brooklet Quadrangles

GRID NORTH - GA. EAST ZONE

- LEGEND**
- PROPERTY BOUNDARY
 - FENCE
 - ||||| RAILROAD TRACK
 - - - - - DITCH
 - ▨ FORMER UST LOCATION
 - MW-4 ● GROUNDWATER MONITORING WELL LOCATION
 - FORMER BUILDING OUTLINE



FILENAME: S:\Premier\Projects\Anvil\Int\A\EarthCon\Statesboro\Closure\Groundwater_Summary_Report_2018\Figures\CAD_Feb-2018\Scale_Samples_02132018.dwg (SITE PLAN) 08/27/19 15:36 - hpham

SOURCE:
 LOCATION: 48TH. G.M.D. BULLOCH CO., GA.
 SURVEYED: DECEMBER 13, 2007; JULY 30, 2009;
 MARCH 29, 2012; OCTOBER 11, 2013;
 MARCH 6, 2017 AND AUGUST 25, 2017
 BY: JAMES M. ANDERSON-GA. R.L.S. 2113

JAMES M. ANDERSON & ASSOCIATES, INC.
 REGISTERED LAND SURVEYORS
 P.O. BOX 894 104 OAK STREET
 STATESBORO, GA. 30459
 PHONE: (912) 764-2002

OSP, LLC
 11021 CLITO ROAD
 STATESBORO, BULLOCH COUNTY, GA

PROJECT NO. 02.20040032



EarthCon Consultants, Inc.
 1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

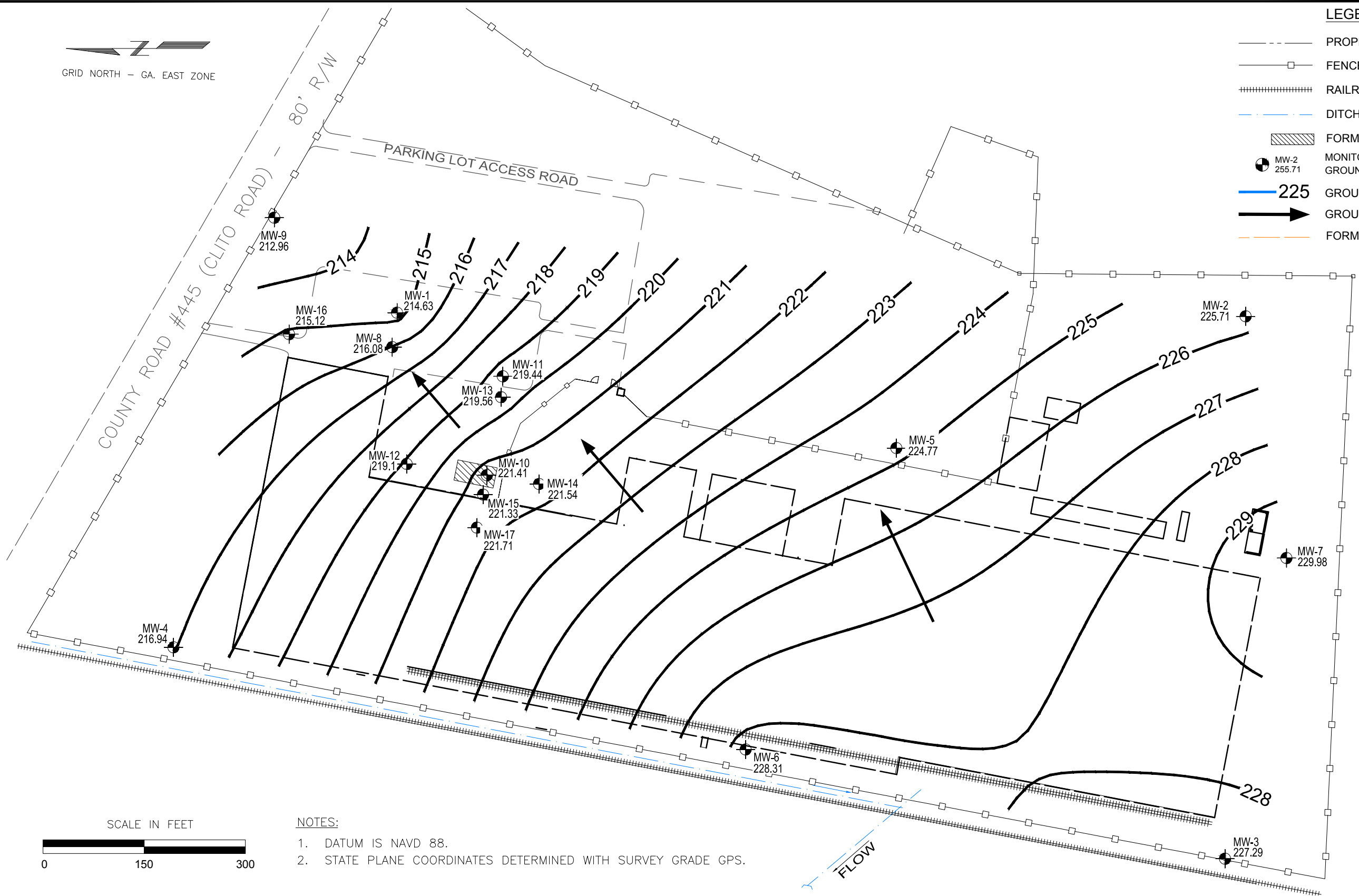
SITE MAP

| | | | |
|------------|--------------|----------------|-----------|
| DRAWN: HVP | CHECKED: CDN | DATE: 8/6/2019 | FIGURE: 2 |
|------------|--------------|----------------|-----------|

GRID NORTH - GA. EAST ZONE

LEGEND

- PROPERTY BOUNDARY
- FENCE
- ++++ RAILROAD TRACK
- - - - DITCH
- ▨ FORMER UST LOCATION
- MW-2
255.71 MONITORING WELL
GROUNDWATER ELEVATION (FT)
- 225— GROUNDWATER LEVEL CONTOUR
- GROUNDWATER FLOW DIRECTION
- - - - FORMER BUILDING OUTLINE



NOTES:

1. DATUM IS NAVD 88.
2. STATE PLANE COORDINATES DETERMINED WITH SURVEY GRADE GPS.



FILENAME: S:\Premier\Projects\Env\Int\Mueller-Statesboro\Closure\Groundwater Summary Report 2018\Figures\CAD_Feb-2017\8Soil Samples_2019.dwg (PLOT 27NOV2019) 08/06/19 12:58 - hpham

SOURCE:
 LOCATION: 48TH. G.M.D. BULLOCH CO., GA.
 SURVEYED: DECEMBER 13, 2007, JULY 30, 2009
 MARCH 29, 2012, OCTOBER 11, 2013, MARCH 6, 2017
 AND AUGUST 25, 2017 BY: JAMES M. ANDERSON-GA.
 R.L.S. 2113

JAMES M. ANDERSON & ASSOCIATES, INC.
 REGISTERED LAND SURVEYORS
 P.O. BOX 894 104 OAK STREET
 STATESBORO, GA. 30459
 PHONE: (912) 764-2002

OSP, LLC
 11021 CLITO ROAD
 STATESBORO, BULLOCH COUNTY, GA

PROJECT NO. 02.20040032



EarthCon Consultants, Inc.
 1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

POTENTIOMETRIC SURFACE MAP
 NOVEMBER 26, 2018

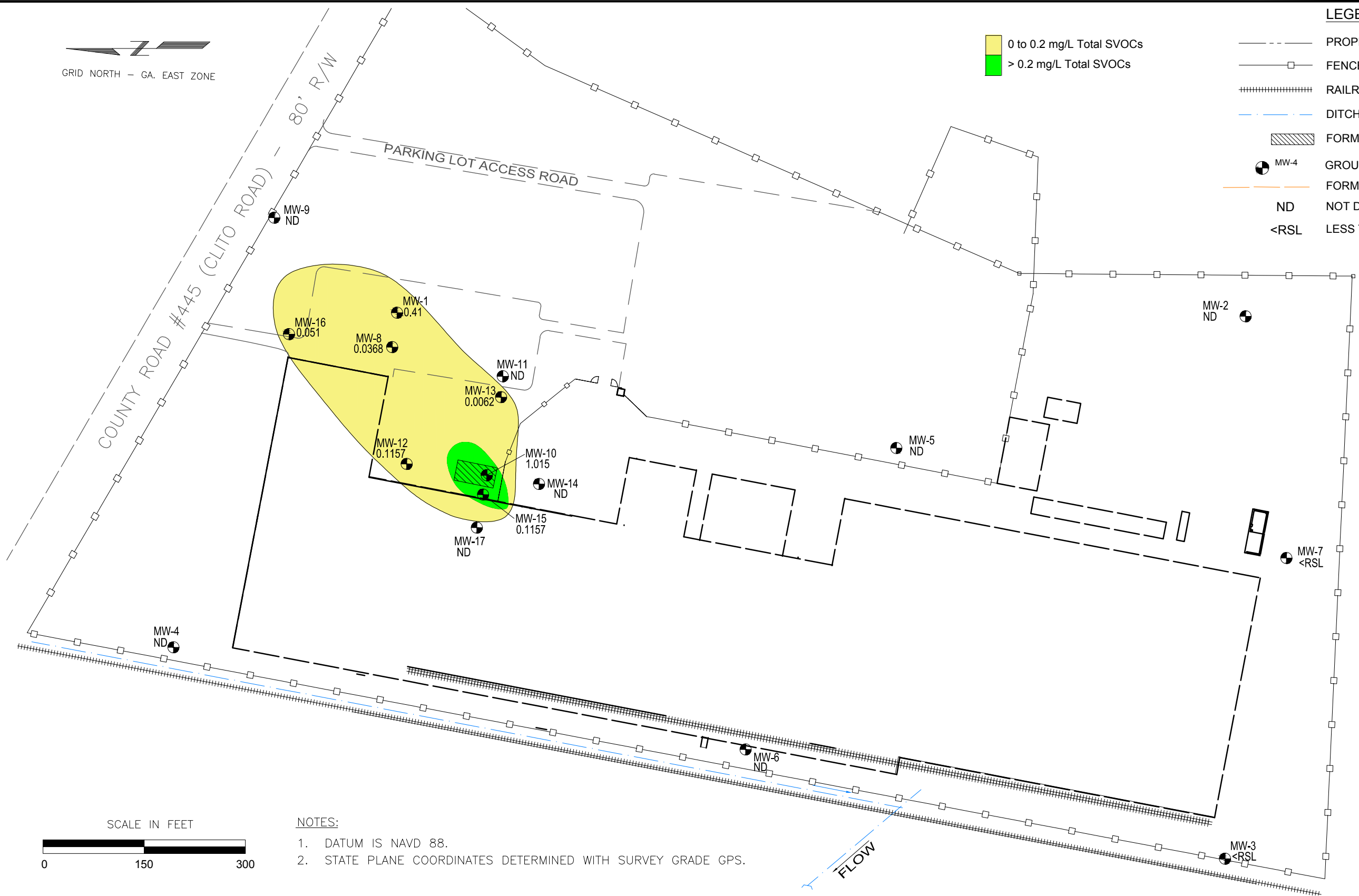
| | | | |
|------------|--------------|----------------|-----------|
| DRAWN: HVP | CHECKED: CDN | DATE: AUG 2019 | FIGURE: 3 |
|------------|--------------|----------------|-----------|

GRID NORTH - GA. EAST ZONE

0 to 0.2 mg/L Total SVOCs
 > 0.2 mg/L Total SVOCs

LEGEND

- PROPERTY BOUNDARY
- FENCE
- ++++ RAILROAD TRACK
- .-.- DITCH
- ▨ FORMER UST LOCATION
- MW-4 GROUNDWATER MONITORING WELL LOCATION
- - - - - FORMER BUILDING OUTLINE
- ND NOT DETECTED
- <RSL LESS THAN REGIONAL SCREENING LEVEL



- NOTES:
- DATUM IS NAVD 88.
 - STATE PLANE COORDINATES DETERMINED WITH SURVEY GRADE GPS.

FILENAME: S:\Premier\Projects\Clients\Kv\Int\Huelter-Statesboro\Former UST Area Assessment\Assessment Report 2017\Figures\CAD_Feb-2018\Soil Samples_0212018.dwg

SOURCE:
 LOCATION: 48TH. G.M.D. BULLOCH CO., GA.
 SURVEYED: DECEMBER 13, 2007; JULY 30, 2009 -
 REVISED TO SHOW MW8; MARCH 29, 2012
 - REVISED TO SHOW MW9 & SOIL BORINGS
 BY: JAMES M. ANDERSON-GA. R.L.S. 2113

JAMES M. ANDERSON & ASSOCIATES, INC.
 REGISTERED LAND SURVEYORS
 P.O. BOX 894 104 OAK STREET
 STATESBORO, GA. 30459
 PHONE: (912) 764-2002

OSP, LLC
 11021 CLITO ROAD
 STATESBORO, BULLOCH COUNTY, GA



EarthCon Consultants, Inc.
 1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

SHALLOW GROUNDWATER PLUME
 NOVEMBER 2018

| | | | |
|------------|--------------|------------------|-----------|
| DRAWN: HVP | CHECKED: EKS | DATE: APRIL 2019 | FIGURE: 4 |
|------------|--------------|------------------|-----------|

Appendix A
UST Closure Documentation

Georgia Department of Natural Resources

205 Butler Street, S.E., Floyd Towers East, Atlanta, Georgia 30334
J. Leonard Ledbetter, Commissioner
Harold F. Reheis, Assistant Director
Environmental Protection Division

REPLY TO:

INDUSTRIAL WASTE MANAGEMENT PROGRAM
3420 NORMAN BERRY DRIVE
7TH FLOOR
HAPEVILLE, GEORGIA 30354
(404)669-3927

March 9, 1990

Mr. Larry Reinbold
Grinnell Manufacturing Division
P.O. Box 427
Statesboro, Georgia 30458

0160113
SUBJECT: Underground Storage Tank (UST) Closure:
Grinnell Property
Highway 301 North
Statesboro, GA; Bulloch County

Dear Mr. Reinbold:

This is in reply to your letter, dated December 21, 1989, reporting soil contamination under the regulated diesel fuel tank that was removed, along with three fuel oil tanks, from the subject location.

In a letter, dated February 27, 1990, to David Muntz of my staff, you documented how the contaminated soil was removed and disposed of at the GSX landfill in Pinewood, South Carolina. Confirmatory soil samples taken from the bottom and side of the resulting excavation show that the contaminated soil was removed successfully; no further action is required.

Copies of the tank closure assessment data and correspondence with EPD should be retained in your files, as required by paragraph 280.74 of the federal UST regulations. I am including a copy of the recently amended GUST Rules for your use, as well as the notification forms you requested.

Mr. Larry Reinbold
March 9, 1990
Page Two

If you have any questions, please contact Darnell Manning at
(404) 669-3927.

Sincerely,

Marlin R. Gottschalk

Marlin R. Gottschalk, Ph.D.
Unit Coordinator
Underground Storage Tank Unit

MRG:dcm/c/wp2

Enclosures

cc: Randolph D. Williams, GA EPD
David C. Muntz, GA EPD
Darnell Manning, GA EPD

File: Releases Resolved/Remediated; *Bulloch* ~~Clarke~~ County, General



Grinnell

MANUFACTURING DIVISION

P.O. Box 427
Highway 301 North
Statesboro, Georgia 30458
912-587-2212

February 27, 1990

RECEIVED
MAR 01 1990

**INDUSTRIAL WASTE
MANAGEMENT PROGRAM**

Mr. David Muntz
Department Of National Resources
Underground Storage Tank Unit
3420 Norman Berry Drive, 7th Floor
Hapeville, Georgia 30354

Dear Mr. Muntz:

This is to notify the state that we have completed the removal of the underground storage tanks.

As in my letter of 12/21/89, we dug out a larger area around the location of the 550 gallon tank and hauled the contaminated soil to Pinewood, South Carolina, a permitted secure landfill. A soil sample was taken from the bottom and from the side of the hole. Both sample results indicated that the hydrocarbons were below the 100 ppm requirement. After the sample results were confirmed, we proceeded to fill the hole with sand and clay.

Please note that the Notification for UST forms are enclosed and I hope they are filled out correctly. Also, the new authorized representative will be David Williams, Manager Plant Engineering and Maintenance.

If you have any questions, please do not hesitate to call. Could you please send me some new Notification Forms?

Sincerely,

Larry Reinbold

Larry Reinbold
Junior Project Engineer

264

LR:sk

Enclosure

Y

Y-DELTA Electrical Co.

Rt. 3, Box 156
Statesboro, GA 30458
(912) 587-5839 • (912) 587-5496



December 27, 1989

Larry Reinbold
Grinnell Corporation
P.O. Box 427
Statesboro, Georgia 30458

RECEIVED
MAR 01 1990

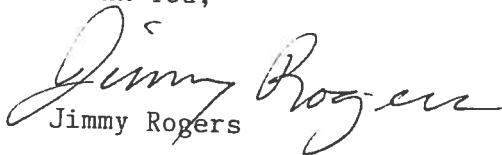
**INDUSTRIAL WASTE
MANAGEMENT PROGRAM**

Dear Larry,

This letter is to inform you that the 4 fuel tanks, 3 - 10,000 gallon, and 1 - 550 gallon, were taken to Stubbs Wrecking Yard after we put holes in them so they could not be reused.

If I can be of further assistance to you please do not hesitate to call.

Thank You,


Jimmy Rogers

JCR/jr



PHONE (912) 681-3473

Stubbs METALS AND WRECKING Co.

Dealers In All Scrap Materials

STATESBORO, GEORGIA 30458

Jan. 24, 1990



ROUTE 9, BOX 52

RECEIVED

MAR 01 1990

Grinnell Corp.
P.O. Box 427
Statesboro, Ga.

INDUSTRIAL WASTE
MANAGEMENT PROGRAM

Mr. Larry Reinbold

This is to Certify that Jimmy Rogers delivered 4 (Four) Tanks
to Stubbs Wrecking Yard. From the Grinnell Corp. 12-12-89.

STUBBS WRECKING YARD

R. E. Stubbs

James W. Andrews, Ph.D.
President

Janette Davis Long
Vice-President

SAVANNAH LABORATORIES AND ENVIRONMENTAL SERVICES, INC.

5102 LaRoche Avenue (31404)
P. O. Box 13548 • Savannah, GA 31416-0548
(912) 354-7858



LOG NO: S0-03564

Received: 30 JAN 90

Mr. Larry Reinbold
ITT Grinnell Corporation
P. O. Box 427
Statesboro, GA 30458

Purchase Order: STA-62072 REL0000

REPORT OF ANALYTICAL RESULTS

Page 1

| LOG NO | SAMPLE DESCRIPTION , SOLID OR SEMISOLID SAMPLES | SAMPLED BY |
|---------------------------------------|---|------------|
| 03564-1 | Sample #1 (1-30-90) | Client |
| PARAMETER | | |
| | 03564-1 | |
| Petroleum Hydrocarbons (IR), mg/kg dw | 70 | |
| Percent Solids, % | 81 % | |

Methods: EPA SW-846.

William D. Sherrod
William D. Sherrod

James W. Andrews, Ph.D.
President

Janette Davis Long
Vice-President

SAVANNAH LABORATORIES AND ENVIRONMENTAL SERVICES, INC.

5102 LaRoche Avenue (31404)
P. O. Box 13548 • Savannah, GA 31416-0548
(912) 354-7858



LOG NO: S0-03566

Received: 30 JAN 90

Mr. Larry Reinbold
ITT Grinnell Corporation
P. O. Box 427
Statesboro, GA 30458

Purchase Order: STA-62072 REL0000

REPORT OF ANALYTICAL RESULTS

Page 1

| LOG NO | SAMPLE DESCRIPTION , SOLID OR SEMISOLID SAMPLES | SAMPLED BY |
|---------------------------------------|---|------------|
| 03566-1 | Sample #3 (1-30-90) | Client |
| PARAMETER | | |
| | 03566-1 | |
| Petroleum Hydrocarbons (IR), mg/kg dw | <11 | |
| Percent Solids, % | 87 % | |

Methods: EPA SW-846.

William D. Sherrod

William D. Sherrod



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt
2600 Bull Street Columbia, SC 29201
Phone (803) 734-5200
Emergency & Holidays: (803) 253-6481

PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter)

Form Approved OMB No 2050-0039 Expires 9-

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No. G1A1D101615131310115110101012
Manifest Document No. 1

2. Page 1 of 1
Information in the shaded areas is required by Federal law, but is by State

3. Generator's Name and Mailing Address
Grinnell Corporation
P.O. Box 427
Statesboro, GA 30458

A. State Manifest Document Number
B. State Generator's ID

4. Generator's Phone (912) 587-2212

5. Transporter 1 Company Name
Willms (GSX)

6. U.S. EPA ID Number
S1C1D101713171019121917

C. State Transporter's ID
D. Transporter's Phone 803-767-3333

7. Transporter 2 Company Name

8. U.S. EPA ID Number

E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
GSX - Pinewood
Route 1, Box 255
Pinewood, SC 29125

10. U.S. EPA ID Number

G. State Facility's ID
H. Facility's Phone

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)
S1C1D101710131715191815

12. Containers No. Type
13. Total Quantity
14. Unit Wt/Vol
15. Waste Number

a. Soil Contaminated With Diesel Fuel

4, 0 ton 77777

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

a. P1W-01410119-411011
b.
c.
d.

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WO-7389

Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St. S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name
Larry Reinbold

Signature Larry Reinbold Month Day Year 10 13 09

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
Daryl Williams

Signature Daryl Williams Month Day Year 01 30 09

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name

Signature Month Day Year

19. Discrepancy Indication Space

a. 73400 lbs. c. lbs.
b. lbs. d. lbs.

20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
PAUL TIMMONS

Signature Paul Timmons Month Day Year 11 4 09

GENERATOR
TRANSPORTER
FACILITY



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste M
2600 Bull Street, Columbia, SC 29201
Phone: (803) 734-5200
Emergency & Holidays: (803)253-648

PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No. **G A D 0 6 5 3 3 0 1 5 1 0 0 0 0 1**
Manifest Document No. **1 0 0 0 0 1**

2. Page 1 of 1
Information in the shaded areas is required by Federal law, but is by State

3. Generator's Name and Mailing Address
**Grinnell Corporation
P.O. Box 427
Statesboro, GA 30458**

A. State Manifest Document Number

4. Generator's Phone (912) 587-2212

B. State Generator's ID

5. Transporter 1 Company Name
Willms (GSX)

6. U.S. EPA ID Number
S I C I D 1 0 7 1 3 1 7 1 0 1 9 1 2 1 9 1 7

C. State Transporter's ID

7. Transporter 2 Company Name

8. U.S. EPA ID Number

D. Transporter's Phone **803-767-3333**

9. Designated Facility Name and Site Address
**GSX - Pinewood
Route 1, Box 255
Pinewood, SC 29125**

10. U.S. EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)
S I C I D 1 0 7 1 0 1 3 1 7 1 5 9 1 8 1 5

12. Containers No. Type
13. Total Quantity
14. Unit Wt/Vol
15. Waste Number

803-452-5003

GENERATOR

| a. | b. | c. | d. |
|------------------------------------|--------|-------|----|
| Soil Contaminated With Diesel Fuel | 40 ton | 71717 | |
| | | | |
| | | | |
| | | | |
| | | | |

J. Additional Descriptions for Materials Listed Above
a. **P1W-040119-411011**
b. **11111111-111111**
c. **11111111-111111**
d. **11111111-111111**

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WO-7388

Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 11 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W. Washington, D.C. 20460; and to the Office of Information and Regulation Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **Larry Reinbold** Signature **Larry Reinbold** Month Day Year **10 11 13 10 19 10**

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name **Charles Fishburne** Signature **Charles Fishburne** Month Day Year **10 13 10 19 10**

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name _____ Signature _____ Month Day Year _____

19. Discrepancy Indication Space
12. A 1 DV
14. A T

a. **37540** lbs. c. _____ lbs.
b. _____ lbs. d. _____ lbs.

20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name **GAIL TIMMONS** Signature **Gail Timmons** Month Day Year **11 30 10**

ACTIVITY

David M - please handle



Grinnell

MANUFACTURING DIVISION

P.O. Box 427
Highway 301 North
Statesboro, Georgia 30458
912-587-2212

RECEIVED

JAN 02 1989

December 21, 1989

M 06 1/3/90
Mr. Marlin Gottschalk
Department of Natural Resources
Underground Storage Tank Unit
3420 Norman Berry Drive, 7th Floor
Hapeville, Georgia 30354

INDUSTRIAL WASTE
MANAGEMENT PROGRAM

Dear Mr. Gottschalk:

This letter is to notify the UST Unit that we have taken four underground storage tanks out of the ground. The small tank is 550 gallons and is regulated whereas the other three 10,000 gallons each are not. After taking the tanks out and having the soil tested, we found that there had been a leak of diesel fuel from the regulated tank. The test results attached confirm that. The samples were taken at three different locations. The third (soil) was taken at a point where the 550 gallon tank was removed. The second (#12) was taken approximately 10-15 feet from the third sample at a location around the removal of one of the 10,000 gallon tanks. The first sample (#10) was taken approximately 20-30 feet from the 550 gallon tank. This seems to indicate that the release is confined to a 10-20 foot area around the 550 gallon tank.

Grinnell proposes to clean up the release by digging out a larger area around the location of the 550 gallon tank and having the dirt hauled to a permitted secure landfill. The landfill (Pinewood, SC) is owned by the waste hauler, GSX, which is located in South Carolina. At that point we would retest the site to make sure we were within the 100 PPM criteria for a UST leak which is less than 1/2 mile from a well. Once we have met all the requirements for cleanup of the UST leak, we will fill the hole with compactable soil on top and notify the state in writing that we had completed the corrective action on the site. We will also attach the lab analysis of the final samples.

All of the above information was either obtained or presented to me by David Muntz per a phone conversation on 12/19/89.

If you have any questions, please do not hesitate to call.

Sincerely,

Larry Reinbold
Junior Project Engineer

LR:sk

Attachments

James W. Andrews, Ph.D.
President

Janette Davis Long
Vice-President

SAVANNAH LABORATORIES AND ENVIRONMENTAL SERVICES, INC.

5102 LaRoche Avenue (31404)
P. O. Box 13548 • Savannah, GA 31416-0548
(912) 354-7858



LOG NO: 89-10848

Received: 12 DEC 89

Mr. Larry Reinbold
ITT Grinnell Corporation
P. O. Box 427
Statesboro, GA 30458

Requisition: STA-34488

REPORT OF ANALYTICAL RESULTS

Page 1

| LOG NO | SAMPLE DESCRIPTION , SOLID OR SEMISOLID SAMPLES | SAMPLED BY | | |
|---------------------------------------|---|------------|---------|---------|
| 10848-1 | #10 (12-12-89) | Client | | |
| 10848-2 | #12 (12-12-89) | Client | | |
| 10848-3 | Soil (No ID) (12-12-89) | Client | | |
| PARAMETER | | 10848-1 | 10848-2 | 10848-3 |
| Petroleum Hydrocarbons (IR), mg/kg dw | | <11 | 200 | 980 |
| Percent Solids, % | | 90 % | 84 % | 88 % |

Methods: EPA SW-846.

William D. Sherrod
William D. Sherrod

AUTHORIZATION REQUEST FORM (con't)

Metallc: (total metals not EP Toxicity Test)

| | | | | | | | |
|----|---------|------------------|---------|----|---------|----|---------|
| As | ___ ppm | Cr ⁺³ | ___ ppm | Ag | ___ ppm | Fe | ___ ppm |
| Ba | ___ ppm | Cr ⁺⁶ | ___ ppm | Ni | ___ ppm | Sb | ___ ppm |
| Cd | ___ ppm | Hg | ___ ppm | Cu | ___ ppm | Mn | ___ ppm |
| Pb | ___ ppm | Se | ___ ppm | Ti | ___ ppm | Co | ___ ppm |
| Zn | ___ ppm | | ___ ppm | | ___ ppm | | ___ ppm |

Toxics:

| | |
|--------------|---------|
| Cyanide | ___ ppm |
| Pesticides | ___ ppm |
| Carcinogens | ___ ppm |
| Other Toxics | ___ ppm |

Other Information : ONLY METALS SUSPECTED ARE THOSE NATURALLY OCCURRING IN SOIL.

Certification :

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature : 

Print Name : DAVID H. WILLIAMS

Date Submitted : 12-27-89

Title : PLANT ENGINEER

TSDF NOTICE OF ACCEPTANCE:

As required by South Carolina Regulation R.61-79.264.12(b) and R.61-79.265.12(c), based on the information presented in this document, this facility has the appropriate permit(s) for and will accept the waste as described on this form.

Signature : _____

Print Name : _____

Date Submitted : _____

Title : _____

GENERATOR NAME: GRINNELL CORPORATION

WASTE DESCRIPTION: DIESEL FUEL

PROCESS PRODUCING WASTE AT POINT OF GENERATION: _____

EPA/DHEC CODE(S): (____) (____) GSX CODE # PV-
(If one has been assigned)

NO YES

- Does this waste contain more than 49 ppm PCB?
- Does this waste contain dioxin?
- Does this waste contain over 1000 ppm of the Halogenated Organics listed in Appendix III of 268, regulated under 268.32?
- Could this waste be properly classified as ignitable (D001) as defined in 40 CFR 261.21?
- Does this waste contain free liquid, with a flashpoint less than 140°F?
- Could this waste be properly classified as reactive (D003) as defined in 40 CFR 261.23?
- Is this waste an oxidizer as defined by 49 CFR 173.151?
- Does this waste contain cyanide greater than 250 ppm as detected by EPA Method 9010?
- Does this waste contain sulfide greater than 500 ppm as detected by EPA Method 9030?
- Could this waste be properly classified as F020, F021, F022, F023, F026, F027 as defined in 40 CFR 261.31? (See attachment #1)
- Is this waste restricted from land disposal per the Hazardous and Solid Waste Amendments of 1984, effective November 8, 1986, and expanded November 8, 1988? These wastes include F001, F002, F003, F004, F005, as defined in Attachment #2.
- Has anything been added to solidify this waste?
- If yes, has the waste been stabilized in such a way to pass the unconfined compressive strength as determined by the test given in the statutory Interpretive Guidance of June 11, 1985.
- If yes, did the solidification agent used contain greater than one percent total organic carbon?
- Has anything been added to this waste to reduce the level of F001 thru F005 listed solvents or Halogenated Organic compound listed in Appendix III of 268, regulated under 268.32?
- Has this waste been treated to reduce the level of F001 thru F005 listed solvents or Halogenated Organic compounds listed in Appendix III of 268, regulated under 268.32?
- I have studied the "First Third" waste listings given in 268.10 (see attachment 3) and certify that none of these descriptions apply to this waste, except those declared on page one of the ARF.
- Is this waste derived from or mixed with any waste listed in the "First Third" 268.10?
- Is this waste derived from or mixed with any RCRA hazardous waste other than those listed on page one of this ARF?

If so, state the hazardous waste codes from which this waste is derived or mixed with.

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

GENERATOR SIGNATURE: *David H. Williams*

PRINT NAME: DAVID H. WILLIAMS

DATE: 12-27-89

Notification for Underground Storage Tanks

FORM APPROVED
OMB NO. 2040-0049
APPROVAL EXPIRES 6-30-88

MAR 11 1990

MD 5/2/92

I.D. Number

STATE USE ONLY

0160113

Date Received

GENERAL INFORMATION

Notification is required by Federal law for underground tanks that have been used to store regulated substances on or after January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—

(a) in the case of an underground storage tank in use on or before November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes.
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks.

4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must be completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)

GRINNELL CORPORATION

Street Address

HIGHWAY 301 NORTH, P.O. BOX 427

County

BULLOCH

City

State

ZIP Code

STATESBORO

GEORGIA

30458

Area Code

Phone Number

912-587-2212

Type of Owner (Mark all that apply)

Current

State or Local Gov't

Private or Corporate

Former

Federal Gov't (GSA facility I.D. no.)

Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section I, mark box here)

Facility Name or Company Site Identifier, as applicable

Street Address or State Road, as applicable

County

City (nearest)

State

ZIP Code

Indicate number of tanks at this location

3

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here)

Larry Reinbold

Job Title

Junior Project Engineer

Area Code

Phone Number

912-587-2212

IV. TYPE OF NOTIFICATION

Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative

Robert A. Sutter, Mgr Engineering & Maintenance

Signature

R. Sutter

Date Signed

8-18-87

Notification for Underground Storage Tanks

FORM APPROVED
OMB NO. 2050-0049
APPROVAL EXPIRES 6-30-88

MAR 01 1990

ID Number

STATE USE ONLY

Date Received

GENERAL INFORMATION

INDUSTRIAL MANAGEMENT PROGRAM

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes.
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks.

4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws.

5. surface impoundments, pits, ponds, or lagoons.

6. storm water or waste water collection systems;

7. flow-through process tanks.

8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations.

9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

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Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must be completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)

GRINNELL CORPORATION

Street Address

HIGHWAY 301 NORTH

County

BULLOCH

City

STATESBORO

State

GEORGIA

ZIP Code

30458

Area Code

912

Phone Number

587-2212

Type of Owner (Mark all that apply)

Current

State or Local Gov't

Private or Corporate

Former

Federal Gov't (GSA facility I.D. no. _____)

Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section I, mark box here)

Facility Name or Company Site Identifier, as applicable

Street Address or State Road, as applicable

County

City (nearest)

State

ZIP Code

Indicate number of tanks at this location

1

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here)

LARRY REINBOLD

Job Title

JUNIOR PROJECT ENGINEER

Area Code

912

Phone Number

587-2212

IV. TYPE OF NOTIFICATION

Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative

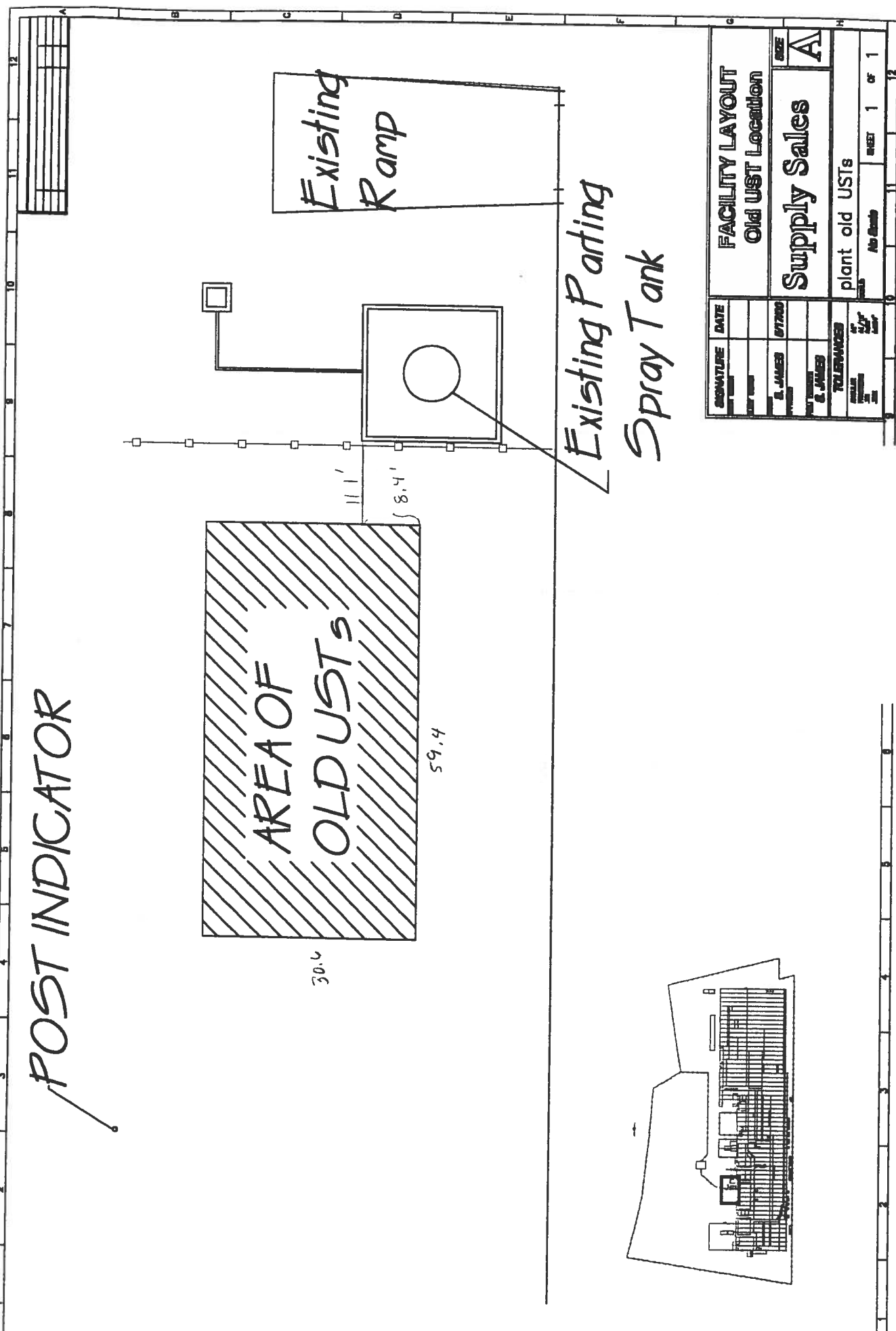
Signature *L. Reinbold*

Date Signed

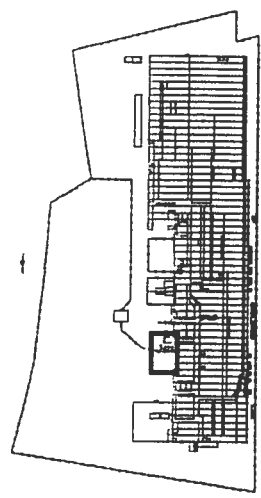
VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)

| Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...) | Tank No. | Tank No. | Tank No. | Tank No. | Tank No. | |
|---|--|---|---|---|---|---|
| 1. Status of Tank (Mark all that apply <input checked="" type="checkbox"/>) Currently in Use Temporarily Out of Use Permanently Out of Use Brought into Use after 5/8/86 | <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| 2. Estimated Age (Years) | 8 | | | | | |
| 3. Estimated Total Capacity (Gallons) | 550 | | | | | |
| 4. Material of Construction (Mark one <input checked="" type="checkbox"/>) Steel Concrete Fiberglass Reinforced Plastic Unknown Other, Please Specify _____ | <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ |
| 5. Internal Protection (Mark all that apply <input checked="" type="checkbox"/>) Cathodic Protection Interior Lining (e.g., epoxy resins) None Unknown Other, Please Specify _____ | <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ |
| 6. External Protection (Mark all that apply <input checked="" type="checkbox"/>) Cathodic Protection Painted (e.g., asphaltic) Fiberglass Reinforced Plastic Coated None Unknown Other, Please Specify _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ |
| 7. Piping (Mark all that apply <input checked="" type="checkbox"/>) Bare Steel Galvanized Steel Fiberglass Reinforced Plastic Cathodically Protected Unknown Other, Please Specify _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ |
| 8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply <input checked="" type="checkbox"/>) a. Empty b. Petroleum Diesel Kerosene Gasoline (including alcohol blends) Used Oil Other, Please Specify _____ c. Hazardous Substance Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No. Mark box <input checked="" type="checkbox"/> if tank stores a mixture of substances d. Unknown | <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ <input type="checkbox"/> <input type="checkbox"/> |
| 9. Additional Information (for tanks permanently taken out of service) a. Estimated date last used (mo/yr) b. Estimated quantity of substance remaining (gal.) c. Mark box <input checked="" type="checkbox"/> if tank was filled with inert material (e.g., sand, concrete) | Removed 12-11-89. / | <i>David A. Williams</i> / | <i>2/1/99</i> / | / | / | |
| | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

100 = 19.5'
 1" = 18.57'



| | | | | |
|-------------|--|--------|------------------|--|
| SIGNATURE | | DATE | FACILITY LAYOUT | |
| E. JAMES | | 8/7/70 | Old UST Location | |
| E. JAMES | | | Supply Sales | |
| TOLERANCES | | | SIZE | |
| 1/8" = 1/8" | | | A | |
| 1/4" = 1/4" | | | plant old USTs | |
| 1/2" = 1/2" | | | No Grade | |
| 1" = 1" | | | SHEET 1 of 1 | |



Appendix B
Field Sampling Form

