

**Manor Timber Company
102 Black Ankle Road, Manor, Clinch County, GA
GAD061921053**

**RCRA PART B PERMIT RENEWAL APPLICATION FOR
POST CLOSURE CARE AND CORRECTIVE ACTION**

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Georgia Department of Natural Resources
Environmental Protection Division
Hazardous Waste Branch
2 Martin Luther King Jr. Dr. SE, Suite 1054, East Tower
Atlanta, GA 30334

RE: Company certification statement for Manor Timber Company, Inc.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate 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.



Adam Henderson
President

6/28/2023

Date

HAZARDOUS WASTE PERMIT PART A FORM

EPA ID Number

G	A	D	0	6	1	9	2	1	0	5	2
---	---	---	---	---	---	---	---	---	---	---	---

1. Facility Name

Manor Timber Company

2. Reason for Submittal

<input type="radio"/> First-Time Applicant
<input type="radio"/> Modification (Check one)
<input type="checkbox"/> Class 1 not requiring approval
<input type="checkbox"/> Class 1 requiring approval
<input type="checkbox"/> Class 2
<input type="checkbox"/> Class 3
<input checked="" type="radio"/> Renewal

3. Facility Existence Date (mm/dd/yyyy)

		/			/	1	9	6	8
--	--	---	--	--	---	---	---	---	---

4. Facility Status (Check all that apply)

<input type="checkbox"/> Operating TSD
<input checked="" type="checkbox"/> Post-Closure
<input checked="" type="checkbox"/> HSWA Corrective Action

5. Facility Location Address

Street Address 102 Black Ankle Road			
City Manor	County Clinch	State GA	Zip Code 31550
Latitude N31o 04' 36"		Longitude W82o 38' 01"	
Land Type:			
<input checked="" type="radio"/> Private	<input type="radio"/> Municipal	<input type="radio"/> County	<input type="radio"/> State
<input type="radio"/> Federal	<input type="radio"/> Other		

6. Facility Mailing Address

Same as Location Address

Street Address 102 Black Ankle Road		
City Manor	State GA	Zip Code 31550

7. Facility Permit Contact

Full Name Samuel Adam Henderson		Title Owner	
Phone 912-487-2621	Fax 912-487-1664	Email mtc@planttel.net	

8. Facility Permit Contact Mailing Address

Same as Location Address

Street Address 102 Black Ankle Road		
City Manor	State GA	Zip Code 31550

9. Legal Owner and Operator of the Facility

Does the Facility have multiple owners and/or operators? If yes, please use Attachment 1.

Yes No

A. Name of Facility's Legal Owner

Same as Location Address

Full Name Manor Timber Company		Date Became Owner									
		0	3	/	1	4	/	2	0	0	2
Are there any previous owners of this Facility? If yes, please list in an attachment.											
<input checked="" type="radio"/> Yes <input type="radio"/> No											
Owner Type											
<input checked="" type="radio"/> Private <input type="radio"/> Municipal <input type="radio"/> County <input type="radio"/> State <input type="radio"/> Federal <input type="radio"/> Other											
Street Address 102 Black Ankle Road											
City Manor											
State GA				Country Clinch				Zip Code 31550			
Phone 912-487-2621				Fax 912-487-1664				Email mtc@planttel.net			

B. Name of Facility's Legal Operator

Same as Facility's Legal Owner

Full Name Samuel Henderson		Date Became Operator									
		0	1	/	0	1	/	2	0	1	5
Are there any previous operators of this Facility? If yes, please list in an attachment.											
<input type="radio"/> Yes <input checked="" type="radio"/> No											
Operator Type											
<input checked="" type="radio"/> Private <input type="radio"/> Municipal <input type="radio"/> County <input type="radio"/> State <input type="radio"/> Federal <input type="radio"/> Other											
Street Address 102 Black Ankle Road											
City Manor											
State GA				Country Clinch				Zip Code 31550			
Phone 912-487-2621				Fax 912-487-1664				Email mtc@planttel.net			

10. North American Industry Classification System (NAICS) Code(s) for the Facility (at least 5-digit codes)

A. (Primary) 321114	C.
B.	D.

11. Nature of Business

Wood preservation facility that pressure treats wood using 2 types of preservation solutions including chromium copper arsenate (CCA) and creosote.

12. Other Environmental Permits

A. Permit Type		B. Permit Number										C. Description
S	H W - 0 4 7 (D)											GA Hazardous Waste Facility Permit
N	G A R 0 5 0 0 0											Industrial Storm Water Discharge

13. Process Information

Line No.		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
X	1	D	8	0	14854	Y	1	Closed Hazardous Waste Surface Impoundment as Landfill

14. Description of Hazardous Wastes

Line No.		A. EPA Hazardous Waste Code				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes												
								(1) Process Codes					(2) Process Description (if code is not entered in 14.D1)							
0	1	F	0	3	4	1000	P	S	0	1										
0	2	U	0	5	1	100	P	S	0	1										
0	3	F	0	3	5	3000	P	S	0	1										
0	4	F	0	3	5	3500	P	T	4	9										

15. Clean Closed Hazardous Waste Management Units (Do not include current Post-Closure Units)

Unit Name	Dates of Operation		Date of Clean Closure Certification, if applicable	Date of Clean Closure Equivalency Demonstration, if applicable
N/A		to		
		to		
		to		
		to		

16. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the entire facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids under- ground. Include all springs, rivers, and other surface water bodies in this map area. Include drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. USGS 7.5-minute series topographic or orthophotographic maps are available for all areas of the state.

17. Facility Drawing

All existing facilities must include a scale drawing of the facility showing the location of all past, present, and proposed treatment, storage, and disposal areas, including but not limited to solid waste management units and areas of concern.

18. Photographs

All existing facilities must include dated photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. Use the process codes listed in item 14 to indicate the location of all storage, treatment, and disposal areas.

19. List of Affected Governments

Full Name City of Homerville Fire Department		Title Danny Strickland, Chief
Street Address 97 West Dame Avenue		
City Homerville	State GA	Zip Code 31634

Full Name Southern Georgia Regional Commission		Title Henry Moylan, Clinch County Rep
Street Address 1937 Carlton Adams Rd Drive		
City Valdosta	State GA	Zip Code 31601

Full Name Clinch County Board of Commissioners		Title Roger Metts, Chairman
Street Address 22 Courthouse Square, Suite B		
City Homerville	State GA	Zip Code 31634

Full Name Clinch County News		Title Legal Organ for Manor, GA
Street Address 113 East Dame Avenue		
City Homerville	State GA	Zip Code 31634

Full Name City of Argyle, GA (Clinch County)		Title Kaye Riley, Mayor
Street Address PO Box 156		
City Argyle	State GA	Zip Code 31623

Full Name City of Homerville, GA (Clinch County)		Title Brooks Blich, Mayor
Street Address 20 South College Street, Suite A		
City Homerville	State GA	Zip Code 31634

16. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the entire facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids under- ground. Include all springs, rivers, and other surface water bodies in this map area. Include drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. USGS 7.5-minute series topographic or orthophotographic maps are available for all areas of the state.

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19. List of Affected Governments- continued

Full Name Clinch County, GA		Title Brooks Blicht, Mayor
Street Address PO Box 156		
City Argyle	State GA	Zip Code 31623

Full Name City of Fargo (Clinch County)		Title Roy Abbott, Mayor
Street Address PO Box 387		
City Fargo	State GA	Zip Code 31631

Full Name Ware County		Title Elmer Thrift, Commission Chairman
Street Address 305 Oak Street, Suite 227		
City Waycross	State GA	Zip Code 31501

Full Name		Title
Street Address		
City	State	Zip Code


Full Name		Title
Street Address		
City	State	Zip Code

Full Name		Title
Street Address		
City	State	Zip Code

20. Comments (include item number for each comment)

9A. The previous owner was William Peagler, the company was in a Trust and he purchased it from the Trust. The executors of the trust were Marrell Beverly and Edwin Pittman.

21. 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 fines and imprisonment for knowing violations. Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40CFR 270.10(b) and 270.11).

Signature of legal owner, operator or authorized representative 	Date (mm/dd/yyyy) 06/26/2023
Printed Name (First, Middle Initial, Last) Samuel Adam Henderson	Title Owner/Operator
Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title

WALKER & SWEAT
Attorneys at Law
809 Elizabeth Street
P.O. Box 1100
Waycross, Georgia 31502
wands@walkerandsweat.com

COPY

Bruce M. Walker
Forrest W. Sweat, Jr.

Telephone
(912) 287-1100

Facsimile
(912) 285-3454

January 8, 2015

Mr. Judson H. Turner, Director
Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1456, East Tower
Atlanta, GA 30334

Re: Manor Timber Company, Incorporated
EPA ID #: GAD061921052

Dear Mr. Turner:

I represent Manor Timber Company, Incorporated, which plans to sell its wood preserving plant in Argyle, Georgia to Samuel Adam Henderson. Attached please find a copy of the sales contract. Also enclosed is the Part "A" application prepared by Mr. Henderson. Manor Timber Company, Incorporated will remain the owner but Samuel Adam Henderson will be the new operator.

This sale is scheduled to close on April 13, 2015, which should place us in compliance with CFR § 270.40 (B). Please advise if this does not meet your approval.

Very Truly Yours,



Bruce M. Walker

IN WITNESS WHEREOF, the parties to this Agreement have executed the same in duplicate and have hereunto set their hands and affixed their seals the day and year first above written.

SELLERS:

Merrell Beverly

Merrell Beverly, Co-Trustee for William F. Peagler, Jr., which trust is known as Manor Timber Company Trust A; and Co-Trustee for Robert Michael Peagler, which trust is known as Manor Timber Company Trust C

Edwin Pittman

Edwin Pittman, Co-Trustee for William F. Peagler, Jr., which trust is known as Manor Timber Company Trust A; and Co-Trustee for Robert Michael Peagler, which trust is known as Manor Timber Company Trust C

PURCHASER:

Samuel Adam Henderson

Samuel Adam Henderson

Signed, sealed and delivered in the presence of:

Jamie L. Whitaker
Witness

Jamie L. Whitaker

Shonda K. Braddock
Notary

Shonda K. Braddock

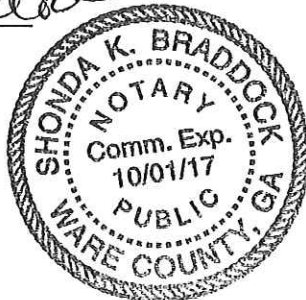


EXHIBIT "A"

TRACT ONE: All that certain tract or parcel of land situate, lying and being in original lots of land Nos. 414 and 415 in the 7th Land District of Clinch County, Georgia, and described as commencing at an iron pin on the west margin of Black Ankle Road and at its intersection with the south margin of the Seaboard Coastline Railroad Company right of way; thence running along a line bearing south 67 degrees 14 minutes west along the southern margin of said railroad right of way a distance of 482.66 feet to a stake; thence running along a line bearing south 16 degrees 52 minutes east a distance of 1,365.02 feet to an iron pin; thence running along a line bearing north 75 degrees 06 minutes 02 seconds east a distance of 480.38 feet to a stake on the west margin of Black Ankle Road; thence running along a line bearing north 16 degrees 52 minutes west a distance of 636.73 feet to an iron pin; thence running along a line bearing north 85 degrees 08 minutes east a distance of 173.29 feet to an iron pin; thence running along a line bearing north 01 degree 25 minutes west a distance of 186 feet to an iron pin; thence running along a line bearing north 63 degrees 58 minutes east a distance of 69.10 feet to an iron pin; thence running along a line bearing north 24 degrees 34 minutes 54 seconds west a distance of 200.31 feet to a stake; thence running along a line bearing south 68 degrees 13 minutes west a distance of 261.34 feet to an iron pin; thence running along a line bearing north 16 degrees 52 minutes west a distance of 464.06 feet to an iron pin, being the point of beginning, containing 17.3561 acres, more or less.

The above described property is more particularly shown by a plat of survey prepared by William H. Branch, Registered Surveyor, for Manor Timber Company, Inc., dated February 3, 1976, as appears of record in Plat Book C, Page 174 in the office of the Clerk of Clinch County Superior Court and reference is hereby made thereto for all proper purposes. Said property is identified on said plat as Tract "B".

TRACT TWO: All that tract or parcel of land, situate, lying and being in Land Lot 414 in the 7th Land District of Clinch County, Georgia containing two (2) acres, more or less, and described as commencing at a point on the westerly margin of Black Ankle Road which point is 424.06 feet south of the intersection of the southern margin of the Seaboard Coastline Railroad right of way with the westerly margin of Black Ankle Road; thence from said beginning point run north 68 degrees 13 minutes east a distance of 337.61 feet; thence run south 24 degrees 34 minutes 54 seconds east a distance of 530.74 feet; thence run south 85 degrees 08 minutes west a distance of 416.73 feet to a point on the westerly margin of Black Ankle Road; thence run north 16 degrees 52 minutes west along the westerly margin of Black Ankle Road; thence run north 16 degrees 52 minutes west along the westerly margin of Black Ankle road a distance of 40 feet; thence run north 85 degrees 08 minutes east a distance of 173.29 feet; thence run north 01 degree 25 minutes west a distance of 186 feet to a point; thence run north 63 degrees 8 minutes east a distance of 69.10 feet; thence run north 24 degrees 34 minutes 54 seconds west a distance of 200.31 feet; thence run south 68 degrees 13 minutes west a distance of 261.34 feet to a point on the westerly margin of Black Ankle Road; thence run north 16 degrees 52 minutes west a distance of 40 feet to the point or place of beginning.

The above description is in accordance with a plat of survey prepared by William H. Branch, Jr., Registered Surveyor, dated February 3, 1976 and revised June 25, 1982 as appears of record in Plat Book D, Page 164, in the office of the Clerk of the Superior Court of Clinch County, Georgia and reference is hereby made thereto for all proper purposes. The land conveyed by this conveyance is identified as Tract "C" on said plat.

TRACT THREE: All that tract or parcel of land situate, lying and being in Land Lot 414 of the 7th Land District of Clinch County, Georgia containing 0.88 acre, being more particularly described as follows: Commence at an nail and cap at the intersection of the center line of the CSX Railroad Track with the center line of Black Ankle Road; thence run south along the center line of Black Ankle Road a distance

of 910.95 feet to an iron pin; thence run north 85 degrees 08 minutes 00 seconds east a distance of 13.53 feet to the point or place of beginning of the lands herein conveyed; thence run from said beginning run north 85 degrees 08 minutes 00 seconds east a distance of 392.20 feet; thence run south 57 degrees 37 minutes 40 seconds west a distance of 267.60 feet; thence run south 43 degrees 29 minutes 20 seconds west a distance of 144.72 feet to the eastern margin of Black Ankle Road; thence run north 16 degrees 52 minutes 00 seconds west along the eastern margin of Black Ankle Road a distance of 224.65 feet to the point or place of beginning. This description is in accordance with a plat of survey prepared by James H. Mills, Registered Land Surveyor, dated June 17, 1991 and recorded in Plat Book F, Page 203 in the office of the Clerk of the Superior Court of Clinch County, Georgia with reference being hereby made to said plat for all proper purposes.

TRACT FOUR: All that tract or parcel of land situate, lying and being in Land Lot 414 of the 7th Land District of Clinch County, Georgia containing 0.07 acre, being more particularly described as follows: Commence at an nail and cap at the intersection of the center line of the CSX Railroad Tract with the center line of Black Ankle Road; thence run south along Black Ankle Road a distance of 500.65 feet to an iron pin; thence run north 71 degrees 52 minutes 20 seconds east a distance of 13 feet to the point or place of beginning of the land herein conveyed; thence from said beginning point run north 71 degrees 52 minutes 20 seconds east a distance of 312.53 feet; thence run south 68 degrees 13 minutes 00 seconds west a distance of 313.61 feet to the eastern margin of Black Ankle road; thence run north 16 degrees 52 minutes 00 seconds west along the eastern margin of Black Ankle Road a distance of 20 feet to the point or place of beginning. This description is in accordance with a plat of survey prepared by James H. Mills, Registered Land Surveyor, dated June 17, 1991 and recorded in Plat Book F, Page 203 in the office of the Clerk of the Superior Court of Clinch County, Georgia with reference being hereby made to said plat for all proper purposes.

Also conveyed is a 1993 Fleetwood Auburn Mobile Home.

TRACT FIVE: All that tract or parcel of land situate, lying and being in Land Lots 413, 414 and 415 in the 7th Land District of Clinch County, Georgia, containing 29.5860 acres, more or less, and described as commencing at a point in the southern margin of the Seaboard Coastline Railroad Right of Way at its intersection with the south original lot line of Land Lot 413, thence from said Beginning Point, run north 67 degrees 14 minutes east along the southern margin of said railroad right of way a distance of 2,212.45 feet; thence run south 16 degrees 52 minutes east a distance of 1,365.02 feet; thence run south 75 degrees 06 minutes 12 seconds west a distance of 649.50 feet; thence run north 00 degrees 15 minutes 52 seconds east a distance of 616.02 feet; thence run north 89 degrees 58 minutes west a distance of 1,811.29 feet to the point or place of beginning.

The above described property is more particularly shown by a plat of survey prepared by William H. Branch, Registered Surveyor, for Manor Timber Company, Inc., dated February 3, 1976 as appears of record in the office of the Clerk of Clinch County Superior Court in Plat Book C, Page 174 and reference is hereby made thereto for all proper purposes, the above described property begin identified on said plat as Tract "A".

COPY

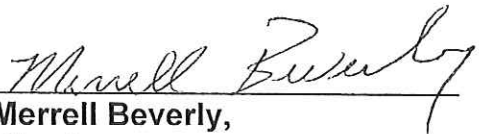
**MINUTES OF MEETING OF BOARD OF DIRECTORS OF
MANOR TIMBER COMPANY, INCORPORATED**

The Board of Directors of Manor Timber Company, Incorporated met at 2:00 p.m. on January 5, 2015 at the office of Walker & Sweat, 809 Elizabeth Street, Waycross, Georgia. Present were all the directors, Merrell Beverly and Edwin Pittman. Edwin Pittman made a motion for the corporation to sell all the company's timber land to Samuel Adam Henderson for \$145,000.00, and that Merrell Beverly and Edwin Pittman as officers of the corporation be authorized to do all things necessary to finalize the transaction. Merrell Beverly seconded the motion. The motion was voted on and approved.

Edwin Pittman made a second motion that all the stock of Manor Timber Company, Incorporated be sold to Samuel Adam Henderson for \$255,000.00, and that Merrell Beverly and Edwin Pittman as officers of the corporation be authorized to do all things necessary to finalize the transaction. Merrell Beverly seconded the motion. The motion was voted on and approved.

There being no further business, the meeting adjourned.

This 5th day of January, 2015.



Merrell Beverly,
Director



Edwin Pittman,
Director

**MINUTES OF MEETING OF SHAREHOLDERS OF
MANOR TIMBER COMPANY, INCORPORATED**

The Shareholders of Manor Timber Company, Incorporated met at 1:00 p.m. on January 5, 2015 at the office of Walker & Sweat, 809 Elizabeth Street, Waycross, Georgia. All the stock of the corporation, being 150 shares, is held in trust by Edwin Pittman and Merrell Beverly. They were both present.

The meeting was called to order by Merrell Beverly. Edwin Pittman made a motion that the Board of Directors be authorized to accept an offer from Samuel Adam Henderson to buy all the timber land owned by the corporation for \$145,000.00. Merrell Beverly seconded the motion. The motion was duly voted on and approved.

Merrell Beverly made a motion that the Board of Directors be authorized to accept an offer from Samuel Adam Henderson to buy all the stock of the corporation for \$255,000.00. Edwin Pittman seconded the motion. The motion was duly voted on and approved.

There being no further business the meeting adjourned.

This 5th day of January, 2015.



Edwin Pittman
Secretary/Treasurer

CLINCH COUNTY, GEORGIA.

COPY

SALES CONTRACT

This agreement made and entered into this 8th day of January, 2015, between **Manor Timber Company, Incorporated**, of Clinch County, Georgia, hereinafter referred to as Seller, and **Samuel Adam Henderson** of Ware County, Georgia, hereinafter referred to as Purchaser.

WITNESSETH;

That Seller agrees to sell to Purchaser and Purchaser agrees to buy from Seller, subject to the terms and provisions of this agreement, the following described property:

SEE EXHIBIT "A" ATTACHED HERETO.

The terms of the agreement are as follows:

1.

The purchase price shall be **\$145,000.00** to be paid at closing. Pursuant to the terms of the Last Will and Testament of William F. Peagler, Sr., the proceeds check from this sale shall be made payable to Bruce M. Walker and LeWayne Dalton as Trustees of Manor Timber Company Trust B and Manor Timber Company Trust D.

2.

Seller acknowledges receipt of the sum of \$1.00 as a binder, and it is agreed that said amount shall be applied to the purchase price when the sale is closed except that if title is not approved by attorneys at law selected by Purchaser, said amount shall be refunded to Purchaser.

EXHIBIT "A"

All of Lot of Land No. 414 lying south of the A. C. L. Railroad and containing 120 acres, more or less. Also 15 acres, more or less, and being a part of Lot of Land No. 415 adjoining to the above tract and described as follows: Lying in the northwest corner of said Lot 415, measuring 1000 feet long east and west and 653.4 feet wide north and south bounded north and west by original lot lines and south and east by lands of Mrs. Robert Peagler.

Also, all of Lot of Lands No. 413 lying south of the A. C. L. Railroad and containing 15 acres, more or less. All of said lands lying and being in the 7th Land District of Clinch County, Georgia and being the same property heretofore conveyed to Mazelle Pittman by Warranty Deed from E. P. Cox, dated August 9, 1949 and recorded in Deed Book TT, Page 128, in the office of the Clerk of the Superior Court of Clinch County, Georgia.

There is EXCEPTED from the above-described property those parcels conveyed to Manor Timber Company by deeds from Mazelle Pittman recorded in Deed Book 3-E, Page 578; Deed Book 3-E, Page 580; Deed Book 3-K, Page 223; and Deed Book 4-E, Page 268, all in the office of the Clerk of the Superior Court of Clinch County, Georgia.

SALES AGREEMENT

This agreement made and entered into this 8th day of January, 2015 by and between **Edwin Pittman and Merrell Beverly as Trustees for William F. Peagler, Jr., which trust is known as Manor Timber Company Trust A**, and **Edwin Pittman and Merrell Beverly, as Trustees for Robert Michael Peagler, which trust is known as Manor Timber Company Trust C**, of Ware County, Georgia and Clinch County, Georgia, hereinafter referred to as "Sellers," and **Samuel Adam Henderson** of Ware County, Georgia, hereinafter referred to as "Purchaser." The Trusts referred to herein were established in accordance with the Last Will and Testament of William F. Peagler, Sr., which is of record in the office of the Probate Court of Ware County, Georgia.

WITNESSETH;

WHEREAS, Sellers and Purchaser have reached an agreement with respect to the sale and purchase of the stock of Manor Timber Company, Incorporated.

NOW THEREFORE, for and in consideration of the premises, the mutual covenants and benefits herein contained, the sum of Ten Dollars (\$10.00) and other valuable consideration, the receipt and sufficiency whereof is hereby acknowledged, the parties hereto, do hereby agree as follows:

1.

Sellers hereby agree to sell to Purchaser and Purchaser agrees to buy from Sellers all the stock of Manor Timber Company, Incorporated. Manor Timber Company, Incorporated owns and operates a wood preserving plant near Argyle. The Company's current address is 102 Black Ankle Road, Manor, GA 31550. The plant site is in Clinch County, Georgia. The assets, represented by the stock, include all corporate bank accounts, inventory, vehicles, machinery, office equipment, furnishings, buildings, any work in progress and the following described real property which constitutes the plant site:

SEE EXHIBIT "A" ATTACHED HERETO

2.

The purchase price shall be Two Hundred Fifty-five Thousand and no/100 Dollars (\$255,000.00) to be paid at closing. Pursuant to the terms of the Last Will and Testament of William F. Peagler, Sr., the proceeds check from this sale will be made payable to Bruce M. Walker & LeWayne Dalton as Trustees of Manor Timber Company Trust B and Manor Timber Company Trust D. A major asset of Manor Timber Company, Incorporated is the Manor Timber Company Financial Assistance Trust Account at Farmers and Merchants Bank in Homerville, Georgia. This account was created and is maintained under directive of the Georgia Environmental Protection Division.

3.

The change in ownership of Manor Timber Company, Incorporated is to be made as a Class 1 Modification with prior written approval of the director in accordance with CFR §270.40 (b). The new owner/operator will submit a revised permit application no later than ninety (90) days prior to the scheduled change. This Agreement specifying a specific date for transfer of permit responsibility will be submitted to the Director.

4.

The Purchaser shall arrange his own financing. He will have the right to have title to the above described property examined and approved by attorneys selected by him. In the event that title to the real estate is not approved, this Agreement shall be null and void.

5.

Closing of the sale shall take place on or before April 13, 2015 in the office of the buyer's attorney or any other place mutually agreed upon. The closing date may be extended once for as much as thirty (30) additional days, if buyers and sellers agree. Sellers agree to deliver at closing the stock of Manor Timber Company, Incorporated.

6.

All closing costs incurred by the Purchaser in connection with this purchase shall be paid by him. The Sellers will be responsible for paying their attorneys for services rendered in connection with this sale. The parties hereto agree to pro-rate the taxes on the property as of the

date of closing.

7.

Sellers agree to be responsible for and pay to the Purchaser payroll taxes for all employees of the business to and including the day of closing.

8.

Sellers agree that they will deliver and make available at closing all invoices, old files and records of the business. Purchaser agrees to maintain the same and to make them available to Sellers upon reasonable request by Sellers for a period of one year from the date of sale. Purchaser agrees that he is acquiring the property of the corporation "as is" on the date of closing.

9.

Sellers and Purchaser acknowledge that this Agreement is based upon the Purchasers agreement to buy this Company with full knowledge of the fact that it has operated for years as a wood preserving plant on this site; and that with this type of facility the owner/operator incurs certain responsibilities, duties, and liabilities to the Environmental Protection Agency and the Georgia Environmental Protection Division (GEPD). As such, the facility is currently operating under a Post Closure Care Permit issued by the GEPD (Permit Number HW-047D). To the best of the knowledge and belief of the Seller, the Seller is operating the facility in compliance with the permit as issued by the GEPD. The Purchaser has had ample opportunity to review the permit and the requirements contained therein and accepts the facility "as is". The Seller and Purchaser agree that they will notify the GEPD of the intended change in ownership of the facility as contemplated by this agreement and the Purchaser will have the sole responsibility for insuring that all permit requirements are met after the closing anticipated herein. The Purchaser agrees to indemnify and hold the Sellers harmless from and against any and all liability, including costs, fines, penalties and attorney's fees associated with any subsequent enforcement action, third party claim, environmental cleanup or other liabilities which may arise in regard to any of the assets being purchased or the environmental conditions or liabilities associated with the same (hereinafter referred to as the "Purchasers' Indemnities"). Purchaser acknowledges that he will assume full responsibility for past and future operations at this site.

10.

In consideration for the Purchaser's Indemnities, Sellers will be transferring to Purchaser the Manor Timber Company Financial Assistance Trust Account at the Farmers and Merchants Bank in Homerville, GA, to provide financial assistance with any liabilities incurred by the Purchaser brought about by the Purchasers' Indemnities as outlines in section 9 hereof. It is understood between Purchaser and Sellers that after this sale, Edwin Pittman, Merrell Beverly, William F. Peagler, Jr., Robert Michael Peagler and the Estate of William F. Peagler, Sr. will be held harmless from liability by the Purchaser regarding indemnified items and that the Purchaser will pay any fines or damages assessed against them related to operations at this site.

11.

Seller further represents and warrants as follows:

- (a) That there are no undisclosed liabilities, taxes, or otherwise, with respect to the business as of the date hereof, nor as of the date of closing;
- (b) That pending closing, Sellers will not cause any material changes in the business, its financial condition, assets, liabilities, or business, other than changes in the ordinary course of business;
- (c) That Sellers have good and marketable title to all assets and properties and interest being transferred herewith; and
- (d) That there are neither lawsuits nor administrative proceedings involving the assets or property sold to the knowledge, information, and belief of Sellers.

12.

The Purchaser represents and warrants as follows:

- (a) That Purchaser intends to continue the business operation and activities of Sellers following the consummation of the sale and will meet all GEPD Permit requirements associated with the continued operations; and
- (b) That Purchaser has full authority to enter into this agreement without approval of any person, firm, or corporation.

13.

The Agreement shall inure to the benefit of and shall be binding upon the parties hereto and their legatees, distributees, estates, executors, administrators, personal representatives, successors and assigns, and other representatives.

14.

No change or modification of this Agreement shall be valid unless the same is in writing and signed by all parties hereto. No waiver of any provision of this Agreement shall be valid unless in writing and signed by the person against whom it is sought to be enforced. The failure of any party at any time to insist upon strict performance of any condition, promise, agreement, or understanding set forth herein shall not be construed as a waiver or relinquishment of the right to insist upon strict performance of the same or any other condition, promise, agreement or understanding at a future time.

15.

This Agreement, and the Exhibit attached, set forth all of the promises, agreements, conditions, understandings, warranties and representations among the parties hereto with respect to the sale of Manor Timber Company, Incorporated and any other matter set forth herein, and there are no promises, agreements, conditions, understandings, warranties, or representations, oral or written, express or implied, among them with respect to the sale of such business or such other matters except as set forth herein. Any and all prior agreements among the parties hereto with respect to the sale of said business and the other subject matters herein are hereby revoked. This Agreement is, and is intended by the parties to be, an integration of any and all prior agreements or understandings, oral or written, with respect to the sale of said business and such other matters set forth herein. It is the express intention of the parties that the agreements and indemnifications contained herein will survive the closing and will continue to be enforceable in a court of law or equity in the State of Georgia. All parties agree that the Superior Court of Ware County, Georgia will have jurisdiction to adjudicate any claims arising under this contract and venue is proper in the Superior Court of Ware County, Georgia.

February 19, 2008

Georgia Department of Natural Resources
Environmental Protection Division
Hazardous Waste Management Branch
Attn: Mr. Tom Brodell
2 Martin Luther King, Jr. Drive SE
Suite 1154E
Atlanta, Georgia 30334-9000

Re: Notice Filed as Required by 40 CFR 264.119
Manor Timber Company, Inc.
Argyle, Clinch County, Georgia

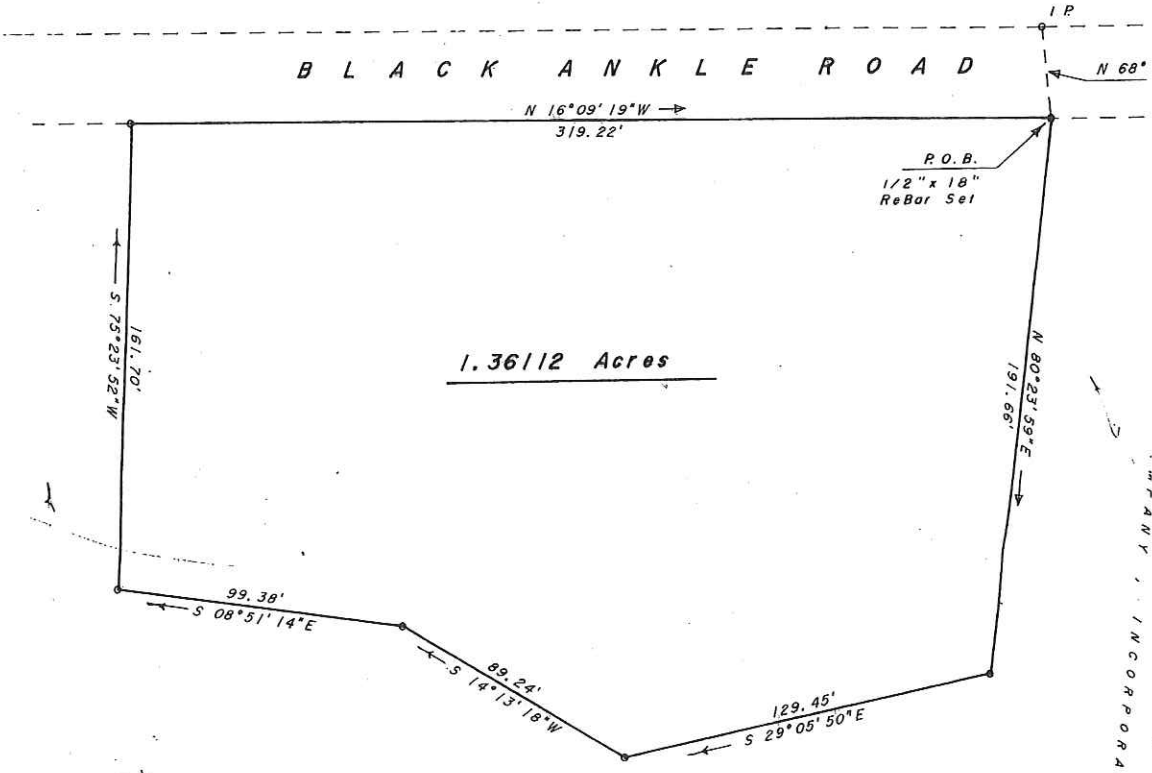
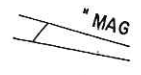
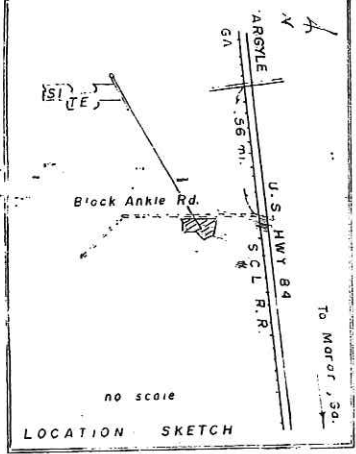
Dear Mr. Brodell:

In accordance with 40 CFR 264.119 we filed the attached notice on the Plat of the Closed Surface Impoundment with the Clerk of Superior Court of Clinch County, Georgia on December 29, 1988.

Sincerely,

A handwritten signature in black ink, appearing to read "William Peagler", with a long horizontal flourish extending to the right.

William Peagler
Owner – Manor Timber Company



MANOR TIMBER COMPANY, INCORPORATED

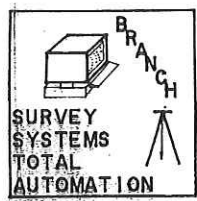
12" TOPSOIL

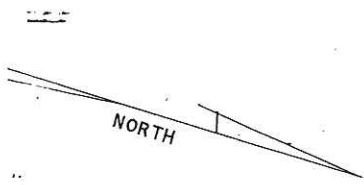
THIS PLAT HAS BEEN RECORDED IN PLAT BOOK E
 PAGE 39 IN THE OFFICE OF THE CLERK OF THE
 SUPERIOR COURT OF CLINCH COUNTY, GEORGIA
 THIS 29 DAY OF Dec, 1988 : TIME 11:15 A.M.
Sarah Belle C. Booth
 CLERK OF THE SUPERIOR COURT

24" LOW PERM.
 CLAY WELL COI
 IN 6" LIFTS

S U R V

MANOR TIMBER CO
 L.L. 114 - 7th LAND DISTRICT - CLINCH
 DATE : 12 DECEMBER 1988 - SCALE : 1





567°14'W - 2895.11'
 To South Ori. L.L. of L.L. 413

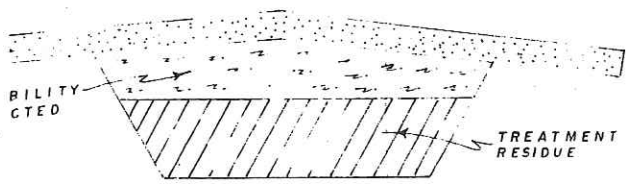
S 16° 52' 00" E
 464.06'
 I.P.
 20° E 31.00'

- N - O - T - E - -

THE OWNER OF THE PARCEL OF LAND DEPICTED HEREON IS UNDER OBLIGATION TO RESTRICT DISTURBANCE OF SAID PROPERTY WHICH IS DESIGNATED AS A HAZARDOUS WASTE DISPOSAL UNIT ALL IN ACCORDANCE WITH THE APPLICABLE REGULATIONS IN SUBPART G OF PART 265, TITLE 40 OF THE CODE OF FEDERAL REGULATIONS

IN MY OPINION THIS PLAT IS A TRUE REPRESENTATION OF THE LAND PLATTED AND WAS PREPARED TO CONFORM WITH THE MINIMUM STANDARDS OF GEORGIA LAW.

CLOSURE: FIELD & PLAT 1" IN 10,000'
 EQUIPMENT USED: TOPCON GS-10 Total Station



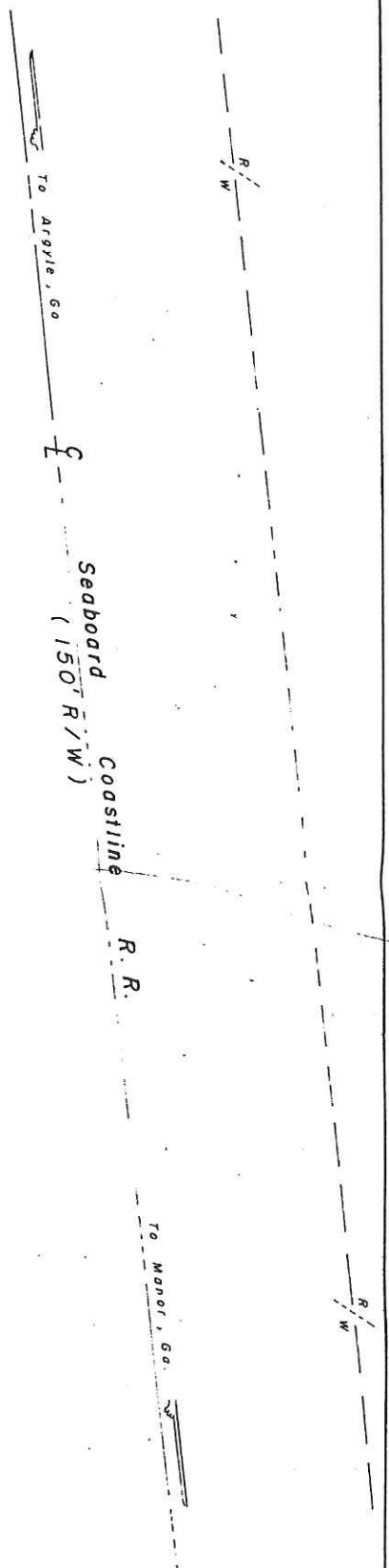
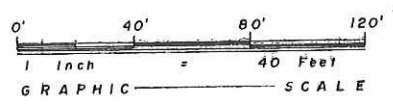
TYPICAL CROSS SECTION
 NO SCALE

Y F O R

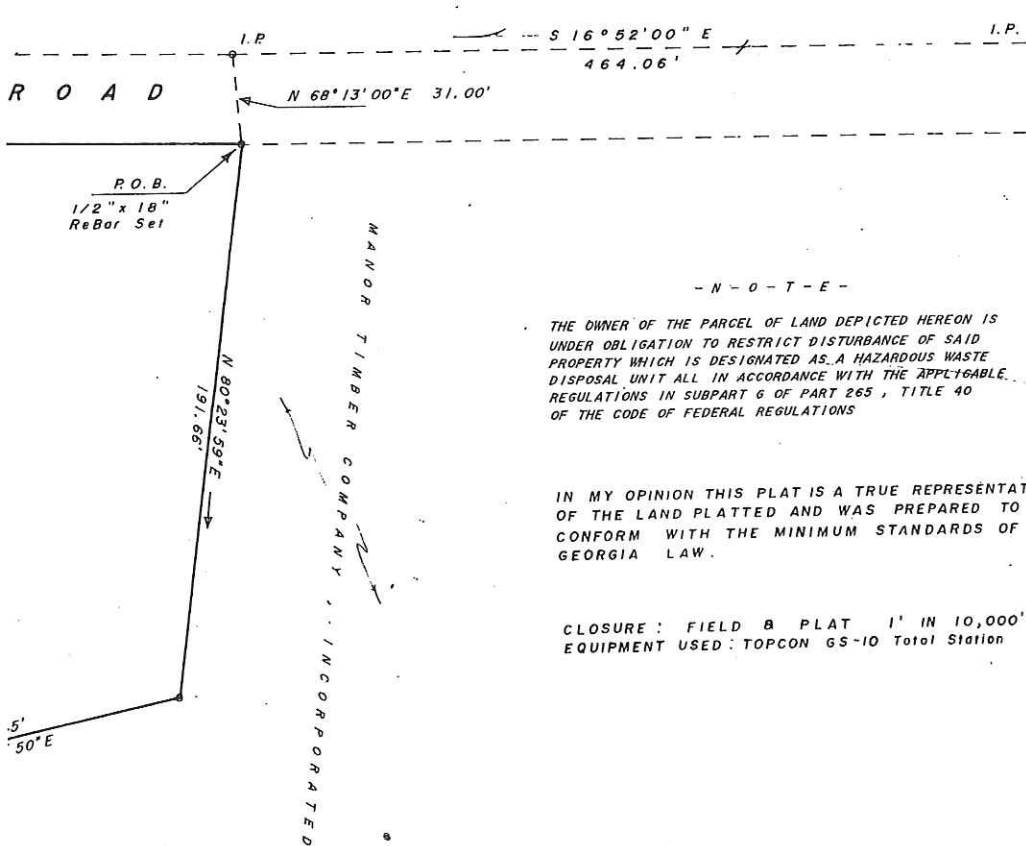
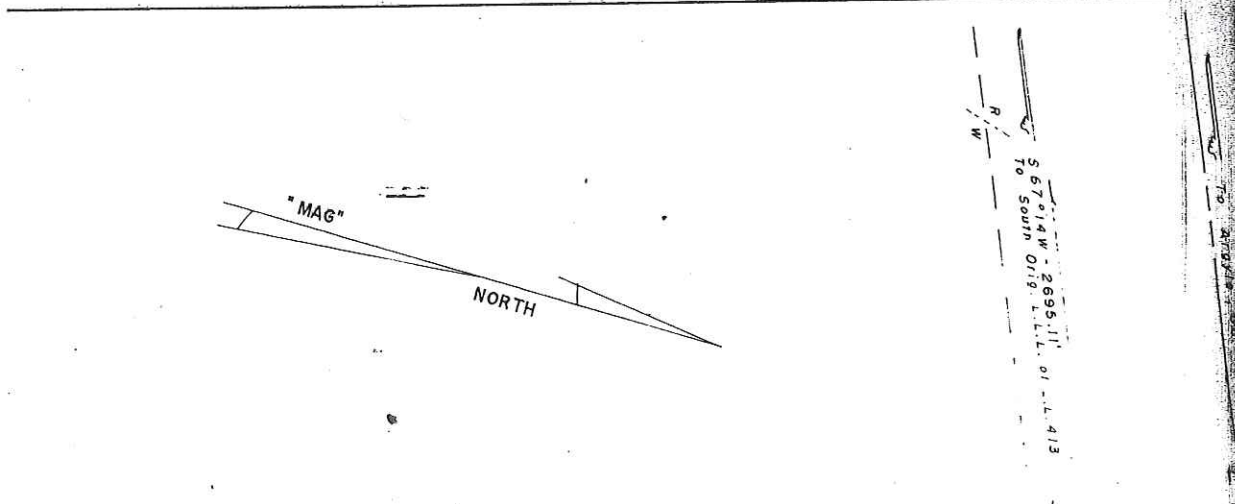
P A N Y , I N C O R P O R A T E D

, GA.

40'



WILLIAM H. BRANCH, JR.
 GA. REG. LAND SURVEYOR NO. 1197
 P.O. BOX 95 STOCKTON, GA. 31649
 PHONE 1-912-242-0778

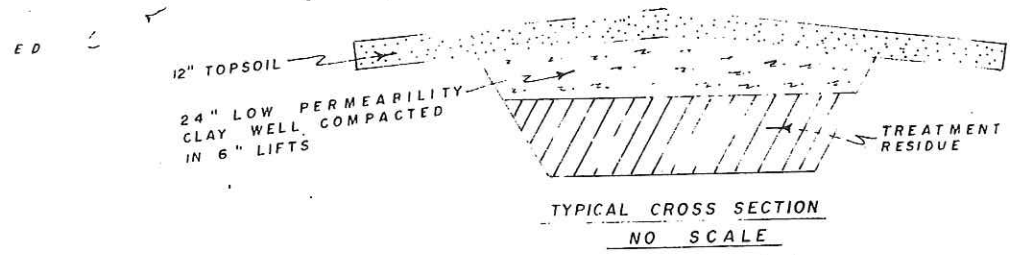


- N - O - T - E -

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IN MY OPINION THIS PLAT IS A TRUE REPRESENTATION OF THE LAND PLATTED AND WAS PREPARED TO CONFORM WITH THE MINIMUM STANDARDS OF GEORGIA LAW.

CLOSURE: FIELD B PLAT 1' IN 10,000'
EQUIPMENT USED: TOPCON GS-10 Total Station



S U R V E Y F O R

T I M B E R C O M P A N Y , I N C O R P O R A T E D

LAND DISTRICT - CLINCH CO., GA.

SCALE: 1" = 40'



**POST-CLOSURE CARE COST ESTIMATE
MANOR TIMBER COMPANY
CLOSED SURFACE IMPOUNDMENT**



Page 3

FILE COPY

A. ONE TIME COST

	USD (\$)
1. INSTALLATION OF MW-20	\$1,250.00
2. INSTALLATION OF RW-3 (IF REQUIRED)	\$2,500.00
3. CLOSURE OF AB-5	\$200.00
4. REPORT OF ACTIVITIES	\$1,500.00
SUBTOTAL	\$5,450.00

B. ANNUAL COSTS

GROUNDWATER MONITORING/SAMPLING

1. SAMPLE COLLECTION	\$2,635.00
2. LABORATORY ANALYSES	\$8,110.00
3. OTHER DIRECT COSTS	\$1,000.00
SUBTOTAL	\$11,745.00

INSPECTIONS (WELLS, FINAL COVER, SITE CONTROL)

1. LABOR	\$2,400.00
2. MISC. MATERIALS	\$1,200.00
SUBTOTAL	\$3,600.00

MAINTENANCE (WELLS, FINAL COVER, SITE CONTROL)

1. LABOR	\$1,500.00
2. MISC. MATERIALS	\$2,000.00
SUBTOTAL	\$3,500.00

CORRECTIVE ACTION PROGRAM

1. ELECTRICITY	\$4,000.00
2. REPLACEMENT GAC CANISTERS	\$3,400.00
3. DISPOSAL COSTS USED GAC CANISTERS	\$3,400.00
4. QUARTERLY ANALYSIS	\$1,000.00
5. SEMI-ANNUAL REPORTS	\$4,500.00
SUBTOTAL	\$16,300.00

	ANNUAL COST	\$35,145.00
PLUS	10% CONTINGENCY	\$3,514.00
	TOTAL ANNUAL COST	\$38,659.00

There are 8 years remaining in the Post Closure Care period. The estimate total is therefore \$309,272. Adding the one-time cost of \$5,450 to \$309,272 gives a Total Post Closure Care Cost Estimate of 314,722. The current value of the Manor Timber Trust Account is approximately \$400,000. This leaves a surplus of \$85,278.



Farmers and Merchants Bank

March 26, 2008

Carol A. Couch, Ph.D., Director
Environmental Protection Division
Department of Natural Resources
2 Martin Luther King Jr. Dr., Suite 1154
Atlanta, GA 30334

Dear Mrs. Couch,

This letter is to confirm that we, Farmers & Merchants Bank, received a deposit in the amount of \$380,194.31 to the Manor Timber Company Financial Assurance Trust Agreement account on March 26, 2008.

Sincerely,

A handwritten signature in cursive script that reads 'Susan P. Smith'.

Susan P. Smith
Vice President

Trust Agreement for Closure and/or Post-Closure Care

Trust Agreement

Trust Agreement, the "Agreement", entered into as of March 26, 2008 by and between Manor Timber Company, Inc. a Georgia corporation, the "Grantor", and Farmers and Merchants Bank, incorporated in the State of Georgia, the "Trustee".

Whereas, the Department of Natural Resources, Environmental Protection Division, "EPD", an agency of the State of Georgia, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility shall provide assurance that funds will be available when needed for closure and/or post-closure care of the facility,

Whereas, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein,

Whereas, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as trustee,

Now, Therefore, the Grantor and the Trustee agree as follows:

Section 1. Definitions.

As used in this Agreement:

- (a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.
- (b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.
- (c) The term "EPD" means the Environmental Protection Division of the Department of Natural Resources, State of Georgia.
- (d) The term "EPD Director" means the Director of the Environmental Protection Division of the Department of Natural Resources, State of Georgia.

Section 2. Identification of Facilities and Cost Estimates.

This Agreement pertains to the facilities and cost estimates identified on attached Schedule A.

Section 3. Establishment of Fund.

The Grantor and the Trustee hereby establish a trust fund, the "Fund", for the

benefit of the State of Georgia. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by EPD.

Section 4. Payment for Closure and Post-Closure Care.

The Trustee shall make payments from the Fund as the EPD Director shall direct, in writing, to provide for the payment of the costs of closure and/or post-closure care of the facilities covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the EPD Director from the Fund for closure and post-closure expenditures in such amounts as the EPD Director shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the EPD Director specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund.

Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management.

The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this Section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that:

- (i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80a-2. (a), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State government;
- (ii) The Trustee is authorized to invest the Fund in time or demand

deposits of the Trustee, to the extent insured by an agency of the Federal or State government; and

- (iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment.

The Trustee is expressly authorized in its discretion:

- (a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and
- (b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee.

Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

- (a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- (b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;
- (c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities

deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

- (d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and
- (e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses.

All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

Section 10. Annual Valuation.

The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the EPD Director a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the EPD Director shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advice of Counsel.

The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation.

The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee.

The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the EPD Director, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 14. Instructions to the Trustee.

All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the EPD Director to the Trustee shall be in writing, signed by the EPD Director or his designee, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or EPD hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or EPD, except as provided for herein.

Section 15. Notice of Nonpayment.

The Trustee shall notify the Grantor and the EPD Director by certified mail within 10 days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed, the Trustee shall not be required to send a notice of nonpayment.

Section 16. Amendment of Agreement.

This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the EPD Director, or by the Trustee and the EPD Director if the Grantor ceases to exist.

Section 17. Irrevocability and Termination.

Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the EPD Director or by the Trustee and the EPD Director if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

Section 18. Immunity and Indemnification.

The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the EPD Director issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

Section 19. Choice of Law.

This Agreement shall be administered, construed, and enforced according to the laws of the State of Georgia.

Section 20. Interpretation.

As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

Section 21. Addresses.

Any notice to the parties to this Agreement or to the EPD Director required by this Agreement shall be deemed sufficient if sent by certified U.S. Mail to the appropriate party or to the EPD Director at the following address:


Grantor:	Manor Timber Company, Inc.
Address:	c/o William Peagler 2611 Heritage Circle Waycross, GA 31501-7675
Trustee:	Farmers and Merchants Bank
Address:	PO Drawer 629 Homerville, GA 31634-0609
EPD Director:	Carol A. Couch, Director
Address:	Environmental Protection Division

Department of Natural Resources
2 Martin Luther King Jr. Dr., Suite 1154
Atlanta, Georgia 30334

It shall be the responsibility of each party to notify the other parties in writing of any change to its address stated above.

In Witness Whereof the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written: The parties below certify that the wording of this Agreement is substantially the same as the wording specified in paragraph 391-3-11-.05 of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division as such regulations were constituted on the date first above written.

[Signature of Grantor]:



William Peagler
Owner and Operator

Attest:



[Title]:

[Seal]:



[Signature of Trustee]:

Juan P. Smith

[Title]: VICE PRESIDENT

FARMERS AND MERCHANTS BAN
978 VALDOSTA HIGHWAY
P.O. DRAWER 629
HOMERVILLE, GA 31634

Attest:

Lisa R. Morgan

[Title]:

[Seal]:



Certificate of Acknowledgment (must accompany the trust agreement)

State of Georgia

County of Clinch

On this March 26, 2008, before me personally came William F. Peagler to me known, who, being by me duly sworn, did depose and say that she/he resides at 2611 Heritage Circle, Waycross, GA, that she/he is Owner of Manor Timber Company, Inc., the corporation described in and which executed the above instrument; that she/he knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that she/he signed her/his name thereto by like order.

(Signature of Notary Public):

Lisa R Morgan



Schedule A

For each facility list the EPA Identification Number, name, address, and the current closure and/or post-closure cost estimates, or portions thereof, for which financial assurance is demonstrated by this Agreement:

EPA ID No.:	GAD061921052
Name:	Manor Timber Company, Inc.
Address:	102 Black Ankle Road Manor, Georgia 31550-6002
Current Post-Closure Cost Estimate:	\$341,300

Exhibit A

All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A

Authorized Signatory

Title

William F. Peagler

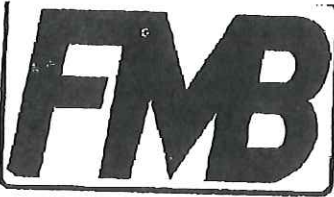
Owner

W / A

W / B

SCHEDULE B

The Fund is established initially as consisting of the property, which is acceptable to the Trustee,
\$380,194.31.



Farmers and Merchants Bank

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P.2



FAVED
03/28/2011

MANOR TIMBER COMPANY
FINANCIAL ASSURANCE TRUST AGREEMENT
102 BLACK ANKLE ROAD
MANOR GA 31550



FDIC

PRIMARY ACCT: 03 [REDACTED] STATEMENT PERIOD: 02/25/2011 - 03/24/2011

SUMMARY:

ACCOUNT NUMBER	PREVIOUS BALANCE	TOTAL DEBITS	TOTAL CREDITS	SERVICE CHARGE	ENDING BALANCE
DDA [REDACTED]	402,520.84	.00	1 463.17	.00	402,984.01
MONEY MARKET [REDACTED]			(YEAR-TO-DATE INTEREST: 1,453.86)		24 08/01 02

-- DEPOSITS AND MISCELLANEOUS TRANSACTIONS --

INTEREST PAID 463.17+ 03/24
CURRENT INTEREST RATE 1.5000 %

-- CHECKS --

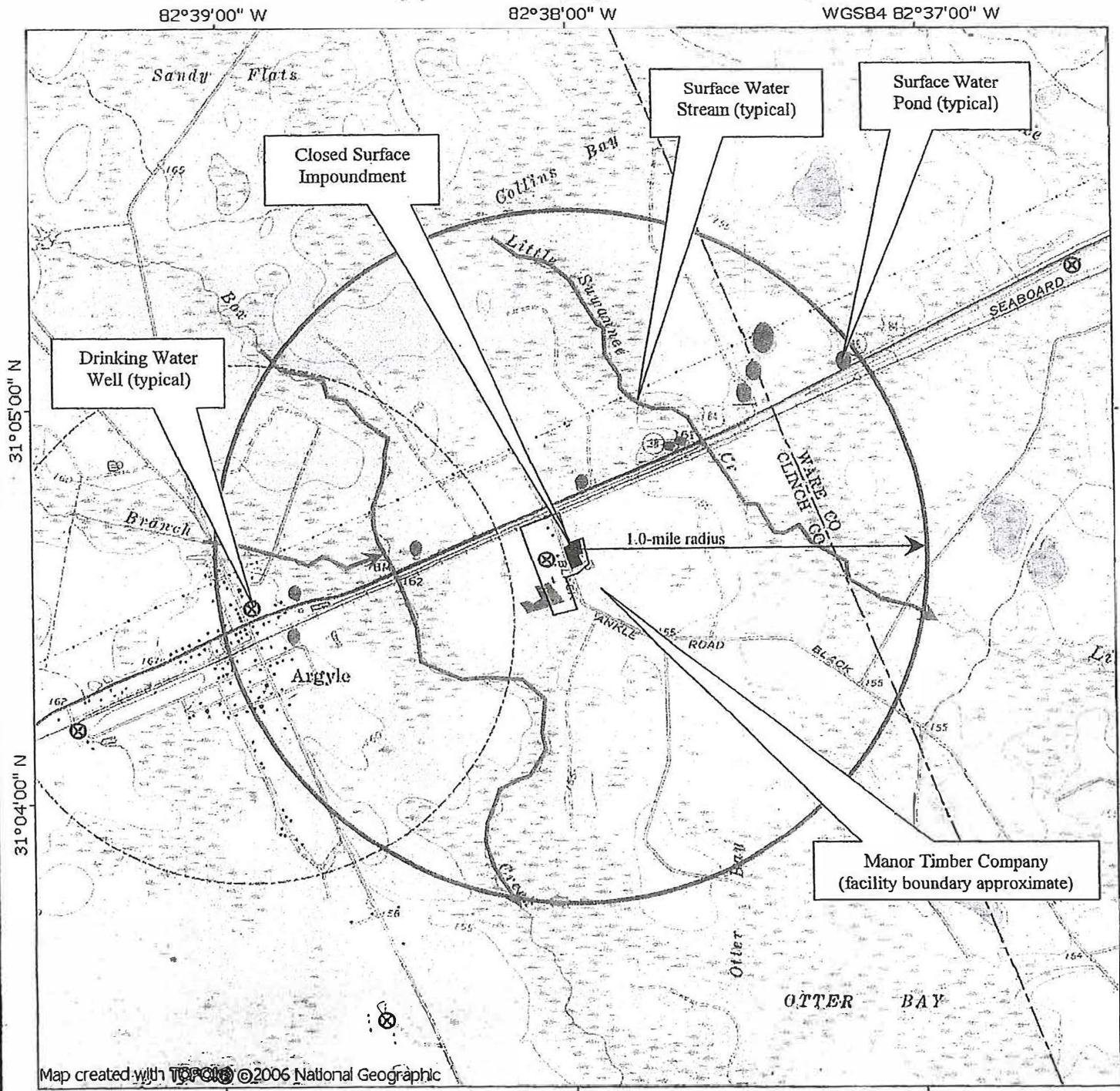
NUMBER.....AMOUNT...DATE NUMBER.....AMOUNT...DATE NUMBER.....AMOUNT...DATE

-- BALANCE INFORMATION --

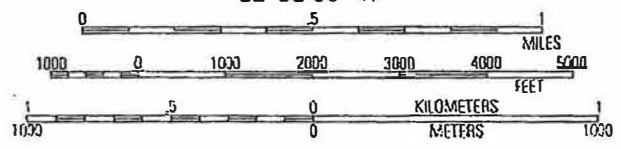
DATE.....BALANCE DATE.....BALANCE DATE.....BALANCE
02/24 402,520.84 03/24 402,984.01
AVERAGE BALANCE FOR THIS STATEMENT CYCLE: \$402,520.84

NOTE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.

Map prepared from a copy of the USGS Homerville, East, Ga 1988 7.5 minute Quadrangle.



**NATIONAL
GEOGRAPHIC**








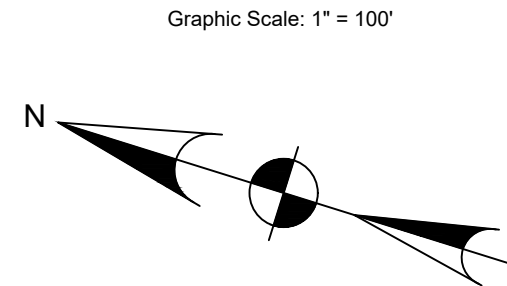
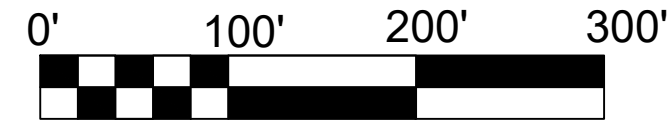
MN ↑ TN
5 1/2 °
12/11/07

Enviroisk Consultants, Inc.
PO Box 945
Grayson, GA 30017

FACILITY TOPOGRAPHIC MAP
MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, CLINCH COUNTY, GEORGIA
GEORGIA HAZARDOUS WASTE PERMIT NO. HW-047 (D)

FIGURE
A-16

LEGEND	
	PIZOMETER
	RECOVERY WELL
	MONITORING WELL
	FENCE LINE
	RAILROAD TRACKS



Graphic Scale: 1" = 100'



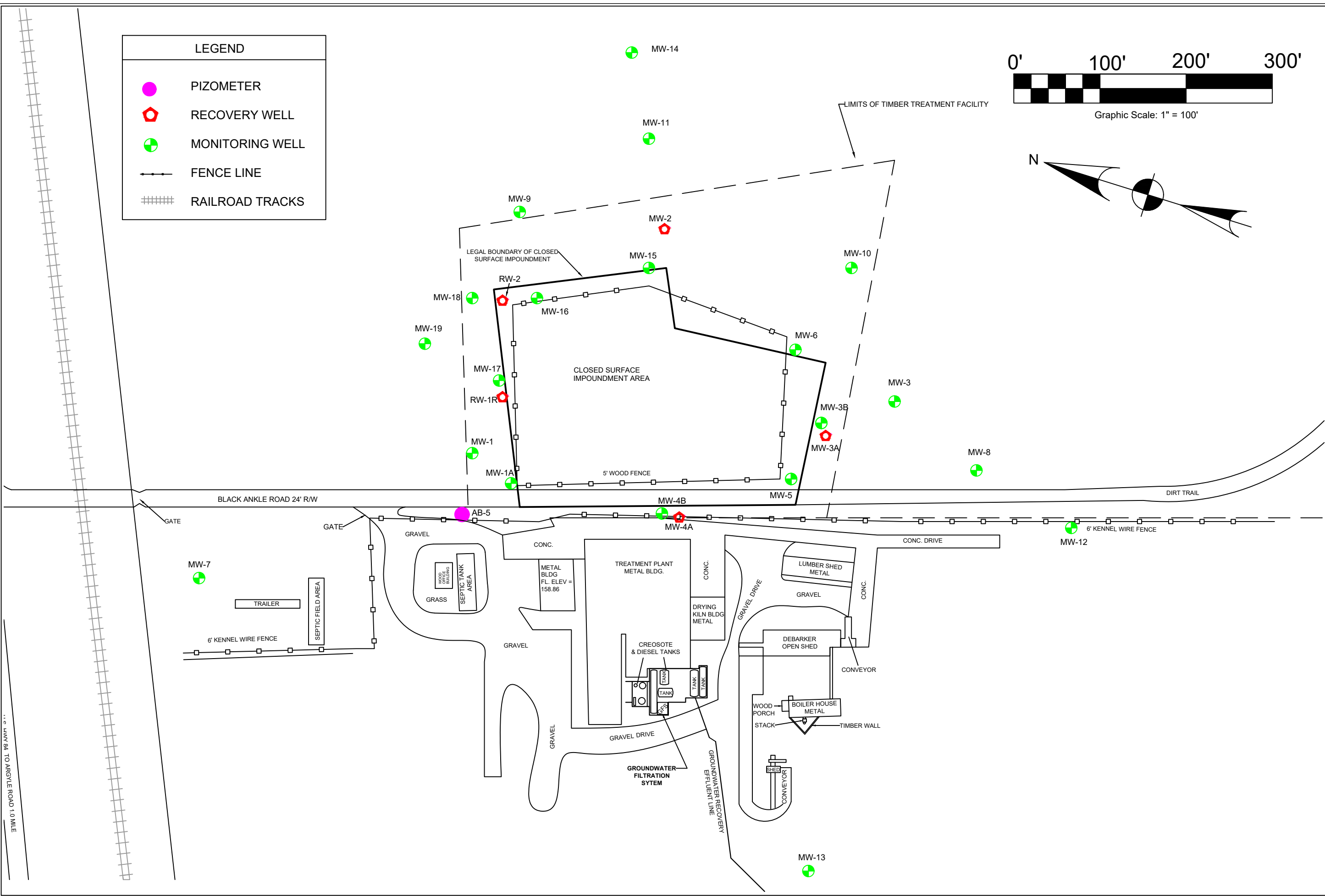
**ENVIORISK
CONSULTANTS, INC.**

**MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA**

FACILITY DRAWING

FIGURE NO

A17





View: The activated carbon system was observed within a bermed area located in the center of the facility.



View: MTC facility grounds



View: Recovery well outside of impoundment



View: The interior drying shed for treated poles at the central portion of the facility.



View: Creosote Retort at the central portion of the facility



View: MW-1A

A18. Photographs (Page 1 of 2)

EnviroRisk Consultants
PO Box 945
Grayson, GA 30017

LEGEND
Source: Site visit
conducted on September
23, 2016

Manor Timber Company
102 Black Ankle Road
Manor, Clinch County, Georgia



View: MW-19



View: MW-18



View: MW-17



View: MW-15



View: Impoundment



View: Treatment barn

A18. Photographs (Page 2 of 2)

EnviroRisk Consultants
 PO Box 945
 Grayson, GA 30017

LEGEND
 Source: Site visit
 conducted on September
 23, 2016

Manor Timber Company
 102 Black Ankle Road
 Manor, Clinch County, Georgia

SECTION B

FACILITY DESCRIPTION

This section provides a general description and overview of the hazardous waste management facility along with a discussion of physical characteristics, as required by 40 CFR 270.15 (b). This description is intended to provide the reader with an overview of the facility.

B-1 General Description (40 CFR 270.14 (b) (1))

Manor Timber Company (MTC) is a small wood treatment company located in Clinch County immediately south of U.S. Highway 84 and 2 miles west of Manor, Georgia. The business was founded in 1968 to process pulpwood. The business expanded in 1972 to wood treatment using either creosote or pentachlorophenol. This activity required the use of an old borrow area as a surface impoundment to hold the wastewater generated by drying wood in the cylinder. In 1983 a dry kiln was built, and the wood was no longer dried in the cylinder. The wood treatment facility is currently active; however, the impoundment has not been used since 1983. Biological treatment was used to clean the waste in the surface impoundment from 1983 to 1988. In 1988, the impoundment was closed as a landfill in accordance with the interim status regulations prescribed at 40 CFR 265.

Raw green pine is delivered to the facility and is debarked and seasoned on-site for use as poles and posts. Seasoning is the air drying of untreated wood. During periods of average sales, the untreated wood is dried outside by normal exposure to the sun and wind. During periods of high sales, the untreated wood is dried in a kiln heated by steam heat produced at the boiler. Milled products, such as landscape timbers and lumber products, are delivered to the site in furnished form and may or may not be seasoned on-site depending on moisture content, the preserving agent to be used, and the intended application for the final product. At no time is seasoning performed by means of a chemical accelerant.

The preservation process consists of either air or kiln drying of the raw wood, followed by pressurized treatment with one of two chemical agents. The drying is done either by kiln or open seasoning. Pressure treating operations are carried out in two large cylindrical vessels. The two chemical wood treatment agents used at MTC are creosote and a CCA (chromated-copper- arsenate) solution.

The facility uses two drip pads for freshly treated wood products to ensure that waste in the form of preservative drippings. are properly managed. The drip pad system includes concrete tramways located in front of the treatment cylinders, building curbs and interceptor pits/collection sumps. The drip pads are located inside the treatment building. Most dripping is done inside the cylinders after treatment.

Treated wood is then moved to the drip pad and held until dripping cessation has been confirmed by operations personnel. The drip pads are swept clean weekly by facility personnel. The drip pads are pressure washed not more than 4 times a year. Wash water from the CCA drip pad is returned to the CCA work tank. CCA sludges and solid material including treated wood debris is removed from the drip pad and stored in a labeled drum as hazardous waste. Wash water, sludges and solids including treated wood debris from the creosote drip pad is removed from the drip pad and stored in a labeled drum as hazardous waste. Drip pad wastes are periodically removed by a third party contractor for appropriate disposal. Annual certification of the drip pads is performed by a third party Professional Engineer.

B-2a Topographic Map (40 CFR 270.14 (b) (19))

Figure B-1 is a topographic map of the MTC drawn to a scale of 1 inch = 100 feet with a one foot contour interval. The terrain is extremely flat with only about 8 feet of relief over the entire site. Mean sea level elevations on the site range from a high of about 163.0 near the center of the site to a low of about 155.0 near the southern boundary.

There are two principal drainage features in the vicinity of the site which include Box Creek to the west and Little Suwanee Creek to the east. Box Creek and Little Suwanee Creek both generally flow from the northwest toward the southeast. The facility and closed surface impoundment are located slightly closer to Box Creek to the south/southwest than Little Suwanee Creek to the east/southeast. The general drainage pattern in the vicinity of the site is to the south/southwest towards Box Creek.

Figure B-2 is a topographic map prepared from a copy of the U.S.G.S 7.5 minute Homerville East 1988 quadrangle. The general topographic setting of the facility and surrounding area are shown on this map. The two principal drainage features with respect to the facility are also identified as Box Creek to the west and Little Suwanee Creek to the east. Little Suwanee Creek emerges from a series of wetlands approximately one mile northwest of U.S. Highway 84. Box Creek emerges from a series of wetlands more than three miles northwest of U.S. Highway 84 and is also joined by a tributary known as Polly Branch just north of U.S. Highway 84. Box Creek is considered the dominant drainage feature in the vicinity of the facility because it exhibits a much larger drainage basin.

Because Box Creek is the dominant drainage feature for the site, the hydrology of Box Creek was used in the floodplain determination for the facility discussed in the following section. The following paragraphs present information of the plant facilities in accordance with the requirements of 40 CFR § 270.14(b)(19), using **Figures B-1, B-2, B-3** and other included information as reference.

100-Year Floodplain Area

A review of a 2009 FEMA National Flood Insurance Rate Map indicates the facility and surrounding areas are located outside of the 100 year flood plain boundary in the FEMA Flood Zone designation "Zone X". Zone X is defined as areas of 0.2% annual chance of flood; areas of 1% annual chance of flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual change of flood. Box Creek to the south is the dominant drainage feature in the vicinity of the site. A copy of a current FEMA map and the National Flood Hazard Layer FIRMette are provided in **Appendix B1**. The site is marked with a red asterisk on the map.

Surrounding Land Use

Land use surrounding the MTC plant site consists of undeveloped timberland. The nearest development is approximately 0.75 miles west and approximately 2.0 miles east along U.S. Highway 84. This development consists of low-density residential land use on the outskirts of the cities of Argyle and Manor (see **Figures B-1 and B-2**).

Surface Waters

There are no surface waters or intermittent streams located on or immediately adjacent to MTC other than borrow areas used for fill which are now identified as ponds (see **Figures B-1 and B-2**). The nearest surface water streams are Box Creek, located approximately 0.5 miles west of the plant site, and Little Suwannee Creek, located about 0.5 miles east of the site. Both of these creeks flow in a general southeastern direction in the vicinity of the site (see **Figure B-2**).

Because of the fine, sandy soils present on the plant site, virtually all stormwater immediately percolates into the shallow groundwater, and little, if any, runoff is generally experienced. During heavy rainfall periods however, it is possible for some limited, short-term surface runoff to occur. Several shallow east/west drainage swales have been constructed on the site to control stormwater. These swales carry surface drainage to the west where it is picked up by a collector channel running in a north-south direction. Some runoff discharges either into the drainage canal paralleling the railroad right-of-way or moves in a southerly direction and eventually discharges into Box Creek through a series of wetlands.

Wind Rose

Figure B-3 illustrates a wind rose, compiled from data supplied by the National Climatological Center in Asheville, North Carolina. The data is based on surface observations made at the National Weather Service station in Alma, Georgia, located about 35 miles northeast of the MIC site. A total of 14,547 observations were made during the period 1954 to 1958. The prevailing wind was reported to be out of the southwest at 7.6 knots.

Access Control

Five gates, including the main gate, the rear gate, and three interior gates, control access to the MTC plant. The main gate controls all ingress and egress to the property at the entrance to Black Ankle Road from U.S. Highway 84. There is no other entrance or exit to the site. The rear gate is located on Black Ankle Road south of the facility and is locked at all times. One interior gate is located near the plant office, one is located by the treatment building, and the other interior gate is located adjacent to the drying kiln (see **Figure B-1**). All gates except for the rear gate are kept open during normal business hours but are locked at night and on weekends.

The closed surface impoundment is located across Black Ankle Road from the main plant site and is fenced around its entire periphery to prevent both vehicular and pedestrian traffic from gaining access. A gate is located on the north side of the impoundment to allow company personnel easier access to make detailed inspections of the facility. This gate is kept locked at all times.

A watchman is on duty 24 hours per day at the site. The watchman provides additional access control to the property.

Black Ankle Road is a Clinch County maintained road. The road is gated at the entrance from U.S. Highway 84 at the MTC facility and is gated southeast of the MTC facility. The gate at U.S. Highway 84 is open from approximately 7:00 am to 5:00 pm Monday through Thursday and from 7:00 am to 1:00 pm on Friday. The gate is locked at all other times. The gate located southeast of the MTC facility is locked at all times. Clinch County officials, MTC and local landowners with real estate interests on Black Ankle Road have keys and therefore access to the Black Ankle Road gates. General public access to the MTC facility is prohibited and prevented by the two gates located on Black Ankle Road north and south of the MTC facility.

Injection and Withdrawal Wells

There are no known injection wells in the vicinity of the MTC site.

There is one existing withdrawal well located on the MTC site. The well is located near the maintenance shop, and it is used as a source of potable water for plant facilities. The well is approximately 400 feet deep and uses the Floridan Aquifer, also known as the Principal Artesian Aquifer, as its source of water supply.

Previously there were two other withdrawal wells located at the MTC facility. One of the wells was located near the boiler, and the other well was located near the old house, located north of the mobile home shown on **Figure B-1**. The two wells were constructed as shallow sand wells approximately 20 feet deep.

The well near the boiler was used for boiler make-up water and the well near the watchman's house was used for watering lawns and the garden. Both of these shallow wells were constructed prior to 1983 and were no longer in use by 1993. It is not known how these wells were closed.

The nearest water supply well to MTC is known as the Argyle city well. The Argyle city well is located 0.9 miles west of the closed surface impoundment. This well is 600 feet deep and draws water from the Floridan Aquifer.

All residences in the Argyle city limits are on city water, except for one trailer located on the west side of the town. This trailer has its own deep well. There are several other water supply wells located southeast of Argyle. One of these is located at the "Bridges of Hope", an alcoholic rehabilitation center. Adjacent to this facility is the "Barlow Creosoting" Hazardous Site #10191. Additionally, private wells are located approximately 2.0 miles east of the MTC facility along U.S. Highway 84. These wells serve single-family residences. It is believed that all of these supply wells obtain groundwater from the Floridan Aquifer.

Figure B-1 displays the location of the on-site supply well. **Figure B-2** shows the locations of the supply wells identified in the site vicinity.

Building and Structures

The location of primary buildings and structures are illustrated on **Figure B-1**. Buildings consist of an office, a maintenance shop, the treating facility (which houses the pressure vessels and drip pads), a drying kiln, and a boiler building. Protective, open-air shelters have also been installed over the post mill and pole mill facilities, the apron area in front of the treatment cylinders (kick-back area), and adjacent to the cylinders for storing creosote treated wood. Bulk storage tanks for concentrated chemical, make-up solutions and diesel fuel are located adjacent to the treating facility. These tanks are either vertically resting on concrete pads or horizontally resting on concrete saddles. The entire area under and around these tanks consists of a concrete pad and dike system designed to contain spills and prevent the contamination of soils and ground water.

Sewers

There are no sanitary, storm or combined sewers located on or in the vicinity of the MTC plant site. A septic tank and drain field system is in use at the office and a septic tank and drainfield system is in use at the mobile home. The office system is located behind the office to the east. The mobile home septic tank and drain field is located adjacent to and east of the mobile home. The septic systems are shown on **Figure B-1**.

Seismic Information

Because the MTC plant is an existing facility, rather than a new facility, the seismic standard referenced in 40 CFR § 270.14(b) (i) and (ii) does not apply.

Floodplain Standard

A review of a 2009 FEMA National Flood Insurance Rate Map indicates the facility and surrounding areas are located outside of the 100 year flood plain boundary in the FEMA Flood Zone designation "Zone C". Zone C is defined as an area of minimal flood hazard with a less than one percent chance for annual flooding. The site is marked with a red asterisk on the map.

Box Creek to the south is the dominant drainage feature in the vicinity of the site. A copy of a current FEMA map and the National Flood Hazard Layer FIRMette are provided in **Appendix B1**.

Security Procedures

According to 40 CFR § 264.14(a) of the hazardous waste regulations, the owner of a hazardous waste management facility must prevent the unknowing entry, and the possibility of unauthorized entry of persons or livestock onto the active portion of the facility. This can be accomplished by one of two means- a 24 hour surveillance system, or an artificial or natural barrier. MTC complies with the latter means of providing security.

Presently a gate secures the entire entrance to the facility on Black Ankle Road from Highway 84. In addition, the active portion of the facility (treatment area, office, kiln, pole debarker) is separately fenced with gates locked during off duty periods. There is also a 24 hour watchman on duty who lives in the mobile home near the gate. The closed surface impoundment has a wooden and barbed wire fence that completely surrounds the area.

The fence is approximately five feet high and consists of four horizontal planks with barbed wire strands. The fence has a single entrance on the north side which is kept locked at all times when not in use. The closed surface impoundment fence was expanded to encompass additional areas of the surface impoundment identified during follow-up investigations. All interior fence posts were removed from the surface impoundment cap and the post holes were backfilled and compacted to cap specifications.

As specified in the regulations, warning signs are posted on the fence on both the north and south sides. The signs read as follows: "Danger Unauthorized Personnel Keep Out". The signs are approximately 1.0 feet square and can be easily read at a distance of 25 feet.

General Inspection Schedule

Inspection information is required by 40 CFR § 270.14(b)(5). MTC performs inspections of the hazardous waste management portion of the facility on a regular basis. The inspections are conducted routinely by qualified plant personnel, and adequately meet the requirements of 40 CFR 264.15(b). The current schedule for testing and maintenance of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment is provided below.

Process Equipment including creosote, CCA, and diesel product and/or work tanks, lines, valves and treatment cylinders are inspected daily for evidence of normal operation or leaks, cracks, corrosion, deterioration and other signs of potential failure.

The groundwater treatment system including groundwater extraction pumps, lines, valves and groundwater filtration system consisting of granular activated carbon canisters are inspected daily for evidence of normal operation or leaks, cracks, corrosion, deterioration and other signs of potential failure. The groundwater filtration system is also tested daily for phenol breakthrough.

The containment dike surrounding the creosote, CCA and diesel tanks as well as the groundwater treatment system is inspected daily for structural deficiencies including cracks and signs of deterioration or erosion.

The final cover for the closed surface impoundment is inspected monthly for evidence of erosion, deterioration, and presence of vegetative cover to prevent erosion. Inspections are also conducted as soon as practicable after a major storm event (i.e., a 1-year storm event; an event producing greater than 2-inches of rain per hour for a minimum of one hour).

Site control measures including locking gates are inspected and used daily.

The drum storage area is inspected weekly for evidence of leaks, failing container systems and signs of deterioration.

Fire safety, spill control, facility communications and decontamination equipment including high pressure water hoses, diesel front-end loaders, two-way radios and land-line telephones are in use daily at the site. This equipment is ready at all times for response to a fire, spill control and other hazardous or emergency response needs.

The drip pads are inspected weekly by facility personnel for evidence of cracks, deterioration, or leaks. The drip pads are also inspected annually and certified by a third party Professional Engineer for compliance.

Groundwater monitoring equipment including monitoring wells, concrete pads and locking well-head protective devices are inspected monthly.

The findings of these inspections and observations will be recorded in the appropriate field forms and maintained in the facility operation record.

Facility Location Information

MTC is located in Clinch County, Georgia. The facility is located in a rural area and does not lie within an incorporated Township or City.

Notice Documentation

Documentation that notices have been filed for hazardous waste disposal units that have been closed in accordance with 40 CFR 264.119 is included in **Appendix B6**.

Post-Closure Cost Estimate/Financial Assurance

The Post-Closure Cost Estimate and Financial Assurance documents required by 40CFR§270.14(b)(16) are included in **Appendix B2**. The most recent statement of Manor's trust fund is also contained in **Appendix B2**.

CORRECTIVE ACTION PROGRAM

Objectives of Corrective Action Program

The objective of the corrective action program for the subject facility is to remove hazardous waste constituents found in the groundwater so as not to exceed their concentration limits at the compliance point. This action will result in preventing further migration of hazardous constituents from the closed surface impoundment as well as to capture contaminants which have already migrated from the closed surface impoundment.

Groundwater Monitoring System

Description of System

The facility, closed surface impoundment and groundwater monitoring and recovery system are shown on **Figure B-1**.

The groundwater monitoring system includes MW-1, MW-1A, MW-3, MW-3B, MW-4B, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, MW-17, MW-18 and MW-19. Wells MW4B, MW-5, MW-6, MW-15, MW-16 and MW-17 are the point of compliance (POC) wells installed along the boundary of the closed surface impoundment.

The details of well installation methods and well logs for the groundwater monitoring system are provided in **Appendix B3**. One additional monitoring well (MW-20) is proposed approximately 150 feet northeast of MW-18 and north of MW-9 (**Figure B-4**).

Ground Water Flow and Rate

Contouring of data during the last 15 years has shown only minor variations due to rainfall variations. Contours for July 2005, July 2006, October 2017, May 2019, and June 2022 are included as **Figures B-5, B-6, B-7, B-8, and B-17**.

Prior to the installation of RW-2, a gradient to the northeast appeared to exist. After installation of RW-2 there appears to be a slight depression created by pumping of RW-2 (**Figure B5**). This depression "moves" slightly from one event to another but generally encompasses the northeast corner of the closed surface impoundment. This depression is illustrated on **Figure B5**. Typically, there is flow away from the closed surface impoundment toward the east and northeast. For additional reference, A discussion of historical groundwater flow and rate between 1991 and 1996 is provided in **Appendix B4**. Since 1996, the flow appears to have somewhat stabilized as precipitation has generally decreased. The adjacent areas north, east and south of the closed surface impoundment were previously thickly wooded and have now been cleared.

It is likely that the clearing will have somewhat of an effect on the groundwater flow directions in this area over time. In any case, the very swampy conditions with standing water previously found around the eastern side are now only rarely seen. The former wet area shown east of the southeast corner is now dry and has been for years. **Table B2** includes a summary of groundwater level elevations from January 1999 to May 2019.

The July 2006 groundwater contours (**Figure B-7**) shows flow from the closed surface impoundment in a generally northeasterly direction; however, the gradient varies from 0.00015 to the east (MW-13 toward MW-4B) to 0.0170 toward the northeast (MW-16 to MW-9). The maximum difference in water levels across the site was only 3.29 feet. The highest water levels were measured at MW-13, MW-4B, MW-5, and MW-7, all along the western margin of the site.

The lowest measured water levels were along the northeast where MW-9 found the lowest reading (149.06 msl) and MW-11 (adjacent to MW-9) at 149.78 msl. The July 2006 interpretation is somewhat changed from several previous ones which showed a depression around the area of the northeast corner of the closed surface impoundment. The area experienced a significant decrease in rainfall prior to July 2006, especially in the six months prior where the average rainfall was 12.45 inches. It is believed that this decrease in rainfall, along with the clearing of the wooded area and pumping of RW-1R and RW-2 caused this change in the contours (no depression).

The average horizontal groundwater flow was calculated using data collected during the May 2019 sampling event. Calculations were performed using the following formula taken from Darcy's equation for fluid flow through a porous medium:

$$V_h = \left[\frac{K \frac{dh}{dl}}{n} \right]$$

Where:

K = the average hydraulic conductivity of 3.25 feet per day (ft/day);

dh/dl = the hydraulic gradient measured as the hydraulic head distance between up-gradient well MW-5 and down-gradient well MW-9, divided by the measured distance between the wells, equaling 0.008 ft/ft; and

n = an estimated effective porosity of 25% or 0.25 (historical sources).

Using this formula, an average horizontal groundwater flow velocity of **0.104** ft/day or **38.0** feet per year (ft/year) was calculated. A previous horizontal flow velocity was calculated in 1995 at 14.2 ft/year using these assumed values.

This calculated value assumes groundwater flow occurs through a homogeneous, isotropic, porous medium and should be considered as an estimate only. Since flow directions are sometimes reversed and/or radial, a constant gradient should not be assumed.

Well Locations

Wells MW-4B, MW-5, MW-6, MW-15, MW-16 and MW-17 were earlier identified as the POC wells. MW-7 is the upgradient well. MW-3B is a deep monitoring well which monitors the underlying aquifer. MW-1, MW-1A, and AB-5 are not sampled and are used only for groundwater level data. Wells MW-8, 9, 10, and 11 are all sentinel wells which are located south and east of the closed surface impoundment to detect movement in these directions. Wells MW-12, MW-13 and MW-14 are "second line" sentinels. MW-19 was the last monitoring well installed (September 1998) to specifically monitor movement beyond MW-18. **Figures B-1** and **B-4** displays well locations. An additional well (MW-20) is proposed for installation northeast of MW-18 and north of MW-9 (**Figure B-4**). It is also proposed that the piezometer AB-5 be closed in accordance with the Water Well Standards Act.

AB-5 should be closed because the groundwater level from this piezometer is no longer necessary due to the extensive groundwater monitoring network currently in place at the site.

Hazardous Constituents Identified

The initial sampling and analysis plan included those constituents listed in Part 264, Appendix VII K001. Appendix IX analyses later performed on the compliance wells identified additional constituents, which were added to the Constituents of Concern (COCs) in the Ground Water Protection Standard (GWPS). These constituents are shown on **Table B1**.

Plume Description

Selected K001, volatile and semi-volatile plume maps are included as **Figures B-9** through **B-16, B-18, and B-19** for 2005-2019. Earlier plume maps do not greatly differ from the later representations in the lateral dimensions, but the level of contamination has dropped significantly over time. For example, on the January 1998 map, MW-3 exhibited 120 µg/l (K001) while in July 2006, there was no contamination detected at the laboratory detection limits. The highest K001 level detected was 7,190 µg/l (MW-17, January 1998) as opposed to 2,031 µg/l detected in MW-17 in the July 2006 representation, a substantial decrease. These differences vary from event to event but a general decrease in magnitude has been observed everywhere except possibly at MW-16 and MW-18. The volatile plume has decreased both in lateral extent and in contaminant levels. MW-11 and MW-15 have recently shown some detections causing expansion or contraction of the zero isoconcentration depending on whether any volatiles are detected.

A review of the horizontal extent of VOCs maps for 2017, 2019, and 2022 (**Figures B13, B15, and B18**) indicate the presence of one dissolved plume with highest concentrations on the northern side of the impoundment. The highest total VOC concentrations for all three events was detected in MW-16 at 1,511 µg/l in October 2017, at 1,439 µg/l in May 2019, and at 2,703 µg/l in June 2022. The plume is approximately 400 feet in length primarily covering the closed surface impoundment. The extent of VOCs is delineated to non-detect concentrations by MW-9/MW-19 to the north, MW-10/MW-11 to the east, MW-5/MW-8 to the south, and MW-7 further to the west.

A review of the horizontal extent of SVOCs maps for 2017, 2019, and 2022 (**Figures B14, B16, and B19**) indicate the presence of one dissolved plume with highest concentrations also on the northern side of the impoundment, similar to the extent of VOCs. The highest total SVOC concentrations for all three events was detected in MW-17 at 4,207 µg/l in October 2017, at 2,994.4 µg/l in May 2019, and at 9,011 µg/l in June 2022. The plume is slightly larger than the VOC plume and stretches approximately 450 feet in length, primarily covering the closed surface impoundment.

The extent of SVOCs is delineated to non-detect concentrations by MW-9/MW-19 to the north, MW-10 to the east, MW-5/MW-8 to the south, and MW-7 further to the west.

Figures B16 and B19 display a slightly larger dissolved plume when compared to **Figure B14** due to the detection of SVOCs in MW-11, located east of the impoundment. MW-11 was non-detect during the October 2017 event; however, this well has historically contained SVOCs.

Concentration vs. Time Graphs

Historical data from selected sampling events between 1996-2006 are plotted on **Graphs 1-6**, created by a previous consultant. These graphs illustrate the variations in contaminant levels for this period and are useful for evaluating the effectiveness of the recovery system in decreasing contaminant levels.

The total K001 constituents for each event are shown on all the graphs, while Graphs 5 and 6 show both total K001 and total volatile COCs detected. Individual descriptions are provided below.

Graph 1 (MW-3) - This graph shows an almost continuous decline in K001 (naphthalene) from January 1996 through July 2006. No volatiles have been detected.

Graph 2 (MW-4B) - From January 1996 to July 2002 there was a downward trend from over 3,000 µg/L to about 400 µg/L. Since then, the levels have varied between 500 µg/l and 1,000 µg/L and have averaged about 750 µg/L as opposed to an average of 1,675 µg/l before July 2002.

Graph 3 (MW-11) - This graph is more erratic than the first two but does show lower average levels from July 2002 through July 2006. During this period, six events detected no contamination with the highest level during this period of 300 µg/L. The average prior to July 2000 was 291 µg/L. The average between July 2000 and July 2006 was 69 µg/L.

Graph 4 (MW-15) – This graph shows varying concentrations of K001 ranging from a low of approximately 34 µg/L in 2006 to a high of 386 µg/L in 1996. Concentrations in MW-15 are lower than others in the sampling network.

Graph 5 (MW-17) - Prior to January 2002, this well had the highest K001 concentrations in the well system (11,520 µg/L, July 1999). Since that time the K001 levels have declined, and contamination has somewhat leveled off between a low of 920 µg/L (July 2004) and 3,256 µg/L (January 2006) with an average of 2,302 µg/L between January 2002 and July 2006. The volatile results appear to be stable at approximately 300 µg/L to 400 µg/L.

Graph 6 (MW-18) - Between January 1997 and July 1999, this well was stable at a K001 level just above 200 µg/L. Between July 1999 and January 2004, the K001 contaminant level climbed to a high of 1,372 µg/L.

In July 2004 the contaminant level dropped to 710 µg/L and then rose to 1,319 µg/L in January 2006. Volatiles also increased between January 1997 and July 2003, then were sporadic between July 2003 and July 2006, with the highest concentration of 581 µg/L in July 2004.

As can be seen on **Graphs 1-6**, most of the previously contaminated wells are exhibiting a decrease in contaminant levels (MW-3, MW-4B, MW-15), are stable (MW-17) or have mixed results (MW-11). MW-16 and MW-18 are the only wells possibly exhibiting increasing contaminant levels.

Concentration versus time graphs were updated in 2017 due to the transfer of the site to a new consultant. Graphs were prepared for SVOCs to evaluate the significance of concentration trends over time (**Graphs 7-13**). Due to the low levels of VOCs detected, graphs were not prepared for VOCs. SVOC concentration versus time graphs were prepared for the following 7 wells: MW-3, MW-4B, MW-11, MW-15, MW-16, MW-17, and MW-18. The other wells sampled had non-detect concentrations, therefore trend graphs were not included.

A review of the graphs indicates overall decreasing trends for MW-4B, MW-16, MW-17, and MW-18. Increasing trends in SVOC concentrations were observed in MW-11, MW-15, MW-7B, MW-12, and MW-12A. MW-3 indicated non-detect concentrations, consistent with recent sampling events. All increases and decreases appear consistent with historic trends.

Ground Water Protection Standard (GWPS)

The initial GWPS was the Part 261 Appendix VII list of K001 constituents plus the five volatiles identified in the initial investigations. During the periodic sampling events, five additional semi-volatile COCs were detected during the annual Appendix IX analysis of the compliance wells. These COCs have been added to the original list giving a total of 29 semi-volatile COCs.

Additionally, ten volatiles have been historically detected at the facility and are included in the present list of constituents identified in the Ground Water Protection Standard for the site. Metals including arsenic, barium, chromium, lead, vanadium and zinc have been detected during Appendix IX sampling. The maximum concentration of these constituents observed were arsenic = 0.031 mg/L, barium = 0.46 mg/L, chromium = 0.11 mg/L, lead = 0.014 mg/L, vanadium= 0.023 mg/L and zinc= 0.14 mg/L.

These metals have not been added to the GWPS list because they are known not to have been part of the former process of the closed surface impoundment and have been deemed likely a result of suspended sediment contained in the groundwater sample analyzed. The present list of GWPS constituents is included as **Table B1**.

Table B3 was prepared by the previous consultant and is included for historical reference only. **Tables B4 and B5** contain all the tabulated data for VOCs and SVOCs. These tables show the variety and contaminant levels of the GWPS constituents detected during the sampling events conducted from January 1998 through 2019.

This data was used to construct the graphs discussed above. In accordance with Part 264.99, additional COCs may be periodically added to the GWPS if detected during the annual Appendix IX analysis.

Corrective Action Plan

Ground Water Recovery System

The recovery system became operational on April 23, 1994. It originally consisted of three recovery wells and a two-line granulated activated carbon (GAC) system. The system was expanded in October 1997 by installation and addition of RW-1R to the groundwater extraction system. The system was further expanded in November 2002 by the installation and addition of RW-2 to the groundwater recovery system. In 2002 the system included 5 total recovery wells, and a 4-line GAC system for treatment. Currently one only carbon canister is utilized to minimize possible leaks.

Previous reports documented that over 12-million gallons of recovered ground water were treated and disposed of between February 2000 and July 2006 (averaging 2-million gallons per year). Pump reports for 2019-June 2022 are attached as **Appendix B7** and document recovered groundwater by well in gallons.

A new recovery well (RW-3) is planned to replace MW-4A, one of the original recovery wells. This well has apparently been clogged, either by clay or another biological obstruction, and has not been operational.

It was originally planned to use treated groundwater for process make-up water; however, it has been found that disposal after treatment is a more efficient option. The effluent is now discharged after treatment to an isolated on-site pond, which has no discharge to surface waters. This disposal option was discussed prior to its use with EPD personnel.

During the past 10-year period, no breakthrough occurred of phenols, pentachlorophenol, or naphthalene in the effluent. Testing of the effluent was conducted daily by plant personnel and was sampled during each semi-annual event. During the period, maintenance and repairs/replacements have occurred as required, Inspection of the system is done daily by plant personnel and these reports are included in each semi-annual report submitted.

Proposed Modification to System

The amount of ground water recovered has not been as efficient as planned. Aquifer testing indicated that MW-3A and MW-4B would produce approximately 3-gallons per minute (gpm); however, based on **Table B6** for the February through July 2006 period, MW-3A was the highest single well producer at 2.43 gpm in February 2006.

Low recovery rates prompted an attempt to increase the recovery of RW-1R in July 2006. The pipe was pulled out and the foot valve intake found to be partially blocked by a gray gelatinous matter. It is believed that this may explain the low production from this well.

Presumably, the screen may be blocked by this bio-mass. Inoculation with a phosphate clay dispersant followed by development with air did not increase the recovery rate. With EPD's concurrence, other methods to improve the recovery may be attempted.

As was noted, recovery well MW-4A has gradually decreased in flow to a condition that the pump could not be kept primed. MTC has agreed to replace this well and discussed the location and installation with EPD's geologist during the July 2006 inspection. This proposed well (RW-3) will be installed adjacent to MW-4B. The depths, construction, etc. will be similar to RW-2 (see log RW-2 in **Appendix B3** for construction details). It is also planned to increase the recovery rate at RW-2 since this area is the only area where there is possible migration from the closed surface impoundment. See **Figure B-4** for the proposed location of RW-3.

Monitoring Frequency

The area of highest levels of contaminants is the northeast corner of the closed surface impoundment. The southern area is either non-detect (MW-3B, MW-5, MW-6, MW-8, MW-10 and MW12) or with low decreasing minor contamination (MW-3). COCs have not detected in adjacent wells MW-9 and MW-19. For these reasons, the monitoring plan is designed to detect any further movement in a northeasterly direction. MW-20 (proposed well) will be located approximately 150 feet northeast of MW-18 and north of MW-9.

All wells will be analyzed for the GWPS except Group II (the annual group). The annual group will include the Appendix IX (without dioxins) on one well biennially.

No dioxins are planned for the analyses since none have been detected in the past ten years. The Appendix IX will be conducted on a rotation basis between MW-4B, MW-15, MW-16, and MW-17. This monitoring program will provide the data needed to determine the effectiveness of the corrective action system.

Group 1: Semi-Annual

Group1 includes sentinel wells near the northeast and eastern portion of the closed surface impoundment that will provide evidence of effectiveness of corrective action program and/or any migration from closed surface impoundment. Monitoring wells in Group 1 include MW-4B, MW-9, MW-11, MW-15, MW-16, MW-17, MW-18, MW-19 and MW-20 (proposed). These wells will be analyzed for the GWPS.

Group 2: Biennial (Appendix IX)

Group 2 wells are compliance wells along the contaminated boundary of the closed surface impoundment. An Appendix IX (without dioxins) analyses will be conducted at one of these wells every other year on a rotary basis. These wells include MW-4B, MW-15, MW-16 and MW-17.

Group 3: Biennial

Group 3 wells are located along the southern portion of the closed surface impoundment and which either have never shown contamination or have shown little or no contamination. Wells in Group 3 include MW-3, MW-3B, MW-5, MW-6, MW-7, MW-8, and MW-10. These wells will be analyzed for the GWPS constituents.

Group 4: Water Levels Only

Wells that historically have shown no evidence of contamination including, MW-1, MW-1A, MW-12, MW-13, and MW-14 will not be sampled. Water level measurements only will be taken at these locations.

Analysis Schedule

Group 1 and Group 3 wells will be sampled and analyzed for the Groundwater Protection Standard constituents identified in **Table B1**.

Group 2 wells be analyzed for the Georgia Appendix IX constituents (less dioxins) biennially on a rotary basis. A copy of the Georgia Appendix IX is included in **Appendix B5**.

Determination of Effectiveness

The most useful data to determine effectiveness of the corrective action system is the comparison of the new data with the past data. This is most apparent in trends observed on the concentration-time graphs prepared either semi-annually and/or annually for those wells located around the northern portion of the closed surface impoundment. The corrective action system, when modified as proposed, will increase the ground water recovery rate ensuring that no contamination is moving outward from the closed surface impoundment.

**MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA 31550
HAZARDOUS WASTE PERMIT NO. HW-047(D)**

TABLE B1. GROUNDWATER PROTECTION STANDARD CONSTITUENTS		
K001 ANALYTES EPA METHOD 8270		VOLATILES EPA METHOD 8260
1	Acenaphthene	Acetone
2	Acenaphthylene	Benzene
3	Anthracene	Ethylbenzene
4	Benzo(a)anthracene	2-Hexanone
5	Benzo(a)pyrene	Methyl Ethyl Ketone
6	Benzo(b)fluoranthene	4-Methyl-2-pentanone
7	Benzo(k)fluoranthene	m-Xylene & p-Xylene
8	Carbazole	o-Xylene
9	2-Chlorophenol	Toluene
10	Chrysene	Vinyl Chloride
11	Dibenz(a,h)anthracene	
12	Dibenzofuran	
13	2,4-Dimethylphenol	
14	2,4-Dinitrophenol	
15	2,4-Dinitrotoluene	
16	Fluoranthene	
17	Fluorene	
18	Indeno(1,2,3-cd)pyrene	
19	2-Methylnaphthalene	
20	2-Methylphenol	
21	3&4 Methylphenol	
22	Naphthalene	
23	p-Chloro-m-cresol	
24	Pentachlorophenol	
25	Phenanthrene	
26	Phenol	
27	2-Picoline	
28	2,3,4,6-Tetrachlorophenol	
29	2,4,6-Trichlorophenol	
30	2,3,4-methylphenol	

Table B2. Groundwater Elevations
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well No.	MW-1	MW-1A	MW-3	MW-3B	MW-4B	MW-5	MW-6	MW-7
Install Date	Dec 1982	May 1984	Dec 1982	Oct 1991	May 1993	Sept 1991	April 1991	Oct 1991
Diameter (Inch)	2"	2"	2"	2"	2"	2"	2"	2"
Well Depth (Ft)	28.0	41.5	39.0	67.0	32.0	15.0	17.5	15.0
Screen Intv (Ft)	21-26'	34.5-39.5'	32-37'	57-67'	20-30'	10-15'	5-15'	9-14'
TOC Elev (Ft)	160.13	160.35	160.68	160.89	161.43	161.40	161.11	159.65

DATE	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV
01/07/99	6.79	153.34	6.78	153.57	7.41	153.27	44.04	116.85	7.71	153.72	7.49	153.91	7.77	153.34	4.74	154.91
07/07/99	6.37	153.76	6.43	153.92	7.69	152.99	44.47	116.42	7.78	153.65	7.56	153.84	8.29	152.82	3.83	155.82
01/10/00	10.01	150.12	NM	NM	11.11	149.57	46.09	114.80	10.92	150.51	10.73	150.67	11.87	149.24	7.95	151.70
07/24/00	5.50	154.63	5.61	154.74	6.43	154.25	46.25	114.64	6.90	154.53	6.59	154.81	6.26	154.85	3.09	156.56
01/25/01	5.25	154.88	5.39	154.96	6.28	154.40	46.23	114.66	6.56	154.87	6.23	155.17	6.00	155.11	3.64	156.01
07/09/01	4.92	155.21	5.00	155.35	5.48	155.20	45.78	115.11	6.05	155.38	5.52	155.88	5.36	155.75	3.66	155.99
01/11/02	8.06	152.07	8.24	152.11	8.70	151.98	47.06	113.83	9.36	152.07	9.12	152.28	9.13	151.98	7.14	152.51
07/11/02	8.01	152.12	8.30	152.05	8.95	151.73	47.29	113.60	9.07	152.36	8.84	152.56	9.16	151.95	6.94	152.71
01/21/03	5.20	154.93	5.36	154.99	5.70	154.98	47.60	113.29	6.43	155.00	6.17	155.23	5.96	155.15	3.77	155.88
07/23/03	6.87	153.26	6.85	153.50	7.20	153.48	48.12	112.77	7.54	153.89	7.01	154.39	7.43	153.68	5.39	154.26
01/07/04	6.13	154.00	6.14	154.21	6.62	154.06	45.11	115.78	7.41	154.02	6.50	154.90	6.21	154.90	4.02	155.63
07/12/04	5.51	154.62	5.52	154.83	5.58	155.10	44.99	115.90	6.59	154.84	5.80	155.60	5.40	155.71	3.20	156.45
01/20/05	5.34	154.79	5.30	155.05	5.69	154.99	44.60	116.29	6.21	155.22	5.50	155.90	5.20	155.91	3.25	156.40
07/06/05	5.04	155.09	4.94	155.41	4.83	155.85	43.80	117.09	5.61	155.82	4.67	156.73	4.52	156.59	3.04	156.61
01/28/06	6.18	153.95	6.17	154.18	6.93	153.75	45.05	115.84	6.74	154.69	6.45	154.95	6.35	154.76	4.03	155.62
07/24/06	9.86	150.27	8.72	151.63	9.23	151.45	45.91	114.98	9.23	152.20	9.10	152.30	9.48	151.63	7.30	152.35
01/29/07	6.00	154.13	6.12	154.23	7.20	153.48	48.00	112.89	7.25	154.18	7.25	154.15	6.93	154.18	4.44	155.21
07/31/07	6.12	154.01	6.19	154.16	7.03	153.65	48.81	112.08	7.25	154.18	7.05	154.35	6.80	154.31	7.80	151.85
01/29/08	5.03	155.10	5.07	155.28	5.75	154.93	48.97	111.92	6.10	155.33	5.80	155.60	5.61	155.5	3.03	156.62
07/24/08	8.11	152.02	8.05	152.30	8.70	151.98	48.57	112.32	8.94	152.49	8.41	152.99	8.72	152.39	6.53	153.12
03/31/09	6.00	154.13	5.91	154.44	7.65	153.03	48.60	112.29	5.60	155.83	6.40	155.00	6.12	154.99	4.20	155.45
07/22/09	7.99	152.14	7.85	152.50	8.08	152.60	48.30	112.59	8.36	153.07	7.66	153.74	8.33	152.78	6.21	153.44
01/18/10	5.10	155.03	5.20	155.15	5.30	155.38	48.60	112.29	6.31	155.12	5.80	155.60	5.50	155.61	2.25	157.40
06/29/10	5.32	154.81	5.29	155.06	5.00	155.68	47.43	113.46	6.30	155.13	4.65	156.75	4.80	156.31	1.86	157.79
01/17/11	7.63	152.50	7.63	152.72	8.36	152.32	48.97	111.92	8.25	153.18	8.25	153.15	8.34	152.77	5.53	154.12
07/13/11	8.95	151.18	9.01	151.34	10.58	150.10	49.74	111.15	10.29	151.14	9.96	151.44	10.44	150.67	7.08	152.57
02/12/12	7.04	153.09	7.01	153.34	6.63	154.05	50.28	110.61	7.90	153.53	6.94	154.46	6.88	154.23	4.92	154.73
07/10/12	6.99	153.14	6.82	153.53	6.50	154.18	49.71	111.18	7.43	154.00	5.90	155.50	6.59	154.52	4.97	154.68
10/23/17	6.11	154.02	6.12	154.23	7.25	153.43	49.73	111.16	7.15	154.28	6.60	154.80	6.93	154.18	4.34	155.31
05/23/19	6.32	153.81	6.37	153.98	6.80	153.88	47.85	113.04	7.13	154.30	6.71	154.69	7.38	153.73	5.33	154.32
06/28/22	6.20	153.93	5.96	154.39	6.35	154.33	47.75	113.14	6.54	154.89	5.97	155.43	6.35	154.76	4.34	155.31

NOTES:

All measurements are in feet

DTW = Depth to groundwater measured using an electronic water level indicator

ELEV = Groundwater elevation calculated as follows: TOC Elevation - DTW

NM = Not Measured

Data collected prior to 2017, well elevations, diameters, depths, and screened intervals were obtained from the previous consultant. Data set may not be complete.

No free product has been detected.

AB-5 is a piezometer location.

POC wells include MW-4B, MW-5, MW-6, MW-15, MW-16 and MW-17.

All elevations based on topographic survey dated July 15, 1991.

Table B2. Groundwater Elevations
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well No.	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14	MW-15
Install Date	Nov 1991	Feb 1992	Feb 1992	May 1992	May 1992	May 1992	July 1992	May 1991
Diameter (Inch)	2"	2"	2"	2"	2"	2"	2"	2"
Well Depth (Ft)	23.0	15.0	15.5	15.0	15.0	15.5	16.5	10.0
Screen Intv (Ft)	12-22'	8-13'	10-15'	9-14'	9-14'	9-14'	10-15'	7-9'
TOC Elev (Ft)	159.40	156.98	159.91	157.20	159.56	159.86	159.33	158.49

DATE	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV
01/07/99	5.29	154.11	3.74	153.24	6.66	153.25	5.45	151.75	4.97	154.59	5.36	154.50	8.47	150.86	4.46	154.03
07/07/99	5.63	153.77	5.76	151.22	7.49	152.42	6.89	150.31	3.85	155.71	5.75	154.11	9.92	149.41	4.74	153.75
01/10/00	9.15	150.25	9.11	147.87	10.99	148.92	10.42	146.78	9.34	150.22	8.46	151.40	13.03	146.30	8.18	150.31
07/24/00	4.36	155.04	1.58	155.40	4.90	155.01	3.90	153.30	3.59	155.97	5.16	154.70	5.97	153.36	2.56	155.93
01/25/01	4.19	155.21	1.70	155.28	4.50	155.41	1.60	155.60	3.98	155.58	4.65	155.21	3.31	156.02	2.95	155.54
07/09/01	3.06	156.34	1.57	155.41	4.04	155.87	1.57	155.63	4.17	155.39	4.39	155.47	3.34	155.99	2.63	155.86
01/11/02	6.91	152.49	6.71	150.27	7.91	152.00	6.02	151.18	7.12	152.44	7.35	152.51	7.26	152.07	6.36	152.13
07/11/02	6.83	152.57	7.65	149.33	8.05	151.86	6.57	150.63	5.35	154.21	7.18	152.68	6.94	152.39	7.81	150.68
01/21/03	4.26	155.14	1.92	155.06	4.85	155.06	1.71	155.49	4.46	155.10	4.88	154.98	3.42	155.91	2.80	155.69
07/23/03	5.31	154.09	5.13	151.85	6.55	153.36	5.05	152.15	5.96	153.60	5.49	154.37	5.69	153.64	4.97	153.52
01/07/04	4.58	154.82	1.78	155.20	4.85	155.06	1.76	155.44	4.60	154.96	4.80	155.06	3.57	155.76	2.98	155.51
07/12/04	3.55	155.85	3.07	153.91	4.44	155.47	2.01	155.19	3.72	155.84	4.96	154.90	3.12	156.21	2.73	155.76
01/20/05	3.50	155.90	1.46	155.52	3.81	156.10	1.40	155.80	3.45	156.11	4.01	155.85	3.21	156.12	2.24	156.25
07/06/05	2.71	156.69	1.39	155.59	3.12	156.79	1.41	155.79	3.33	156.23	3.62	156.24	3.16	156.17	2.21	156.28
01/28/06	4.52	154.88	1.68	155.30	5.10	154.81	1.60	155.60	4.40	155.16	4.85	155.01	3.30	156.03	2.95	155.54
07/24/06	7.45	151.95	7.92	149.06	8.52	151.39	7.42	149.78	7.85	151.71	7.31	152.55	8.22	151.11	6.65	151.84
01/29/07	5.20	154.20	2.40	154.58	5.70	154.21	4.56	152.64	4.62	154.94	5.81	154.05	3.26	156.07	2.90	155.59
07/31/07	5.05	154.35	1.60	155.38	5.82	154.09	1.50	155.70	3.12	156.44	5.91	153.95	3.25	156.08	4.68	153.81
01/29/08	3.95	155.45	1.50	155.48	4.52	155.39	1.31	155.89	3.80	155.76	4.75	155.11	3.24	156.09	2.90	155.59
07/24/08	6.52	152.88	6.11	150.87	7.72	152.19	6.40	150.80	6.90	152.66	6.43	153.43	7.45	151.88	6.22	152.27
03/31/09	4.33	155.07	2.50	154.48	4.95	154.96	2.30	154.90	4.25	155.31	4.65	155.21	3.55	155.78	3.60	154.89
07/22/09	6.08	153.32	6.33	150.65	7.46	152.45	6.20	151.00	6.47	153.09	5.90	153.96	7.51	151.82	6.03	152.46
01/18/10	3.75	155.65	1.60	155.38	4.91	155.00	3.10	154.10	3.50	156.06	4.68	155.18	3.25	156.08	2.85	155.64
06/29/10	3.03	156.37	1.30	155.68	3.82	156.09	1.00	156.20	3.00	156.56	4.00	155.86	3.19	156.14	2.52	155.97
01/17/11	6.44	152.96	6.38	150.60	7.23	152.68	5.51	151.69	6.67	152.89	6.71	153.15	5.65	153.68	5.23	153.26
07/13/11	9.50	149.90	8.55	148.43	9.59	150.32	7.94	149.26	8.95	150.61	8.22	151.64	7.02	152.31	6.47	152.02
02/12/12	5.18	154.22	2.42	154.56	5.55	154.36	2.04	155.16	5.38	154.18	5.49	154.37	3.84	155.49	4.41	154.08
07/10/12	4.77	154.63	3.91	153.07	5.83	154.08	3.89	153.31	5.39	154.17	5.13	154.73	5.91	153.42	4.52	153.97
10/23/17	4.95	154.45	3.57	153.41	5.90	154.01	3.38	153.82	5.37	154.19	5.23	154.63	4.77	154.56	4.59	153.90
05/23/19	5.25	154.15	5.57	151.41	6.70	153.21	5.13	152.07	6.10	153.46	5.41	154.45	6.75	152.58	5.62	152.87
06/28/22	4.46	154.94	3.18	153.80	5.92	153.99	3.86	153.34	5.20	154.36	4.95	154.91	5.34	153.99	3.43	155.06

NOTES:

All measurements are in feet

DTW = Depth to groundwater measured using an electronic water level indicator

ELEV = Groundwater elevation calculated as follows: TOC Elevation - DTW

NM = Not Measured

Data collected prior to 2017, well elevations, diameters, depths, and screened intervals were obtained from the previous consultant. Data set may not be complete.

No free product has been detected.

AB-5 is a piezometer location.

POC wells include MW-4B, MW-5, MW-6, MW-15, MW-16 and MW-17.

All elevations based on topographic survey dated July 15, 1991.

TOC elevation for MW-15 changed from 158.49 to 158.85 based on the 2008 resurvey.

Table B2. Groundwater Elevations
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well No.	MW-16	MW-17	MW-18	MW-19	AB-5
Install Date	May 1991	May 1993	Nov 1996	Sept 1998	May 1991
Diameter (Inch)	2"	2"	2"	2"	2"
Well Depth (Ft)	15.0	18.0	18.0	16.0	15.5
Screen Intv (Ft)	9-14'	12-17'	12-17'	10-15'	5-15'
TOC Elev (Ft)	157.22	157.95	158.93	160.47	159.83

DATE	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV
01/07/99	3.80	153.42	4.90	153.05	5.54	153.39	7.00	153.47	3.84	155.99
07/07/99	3.18	154.04	4.36	153.59	5.57	153.36	7.20	153.27	2.56	157.27
01/10/00	7.32	149.90	8.08	149.87	9.42	149.51	10.62	149.85	8.90	150.93
07/24/00	2.30	154.92	3.53	154.42	4.15	154.78	5.18	155.29	2.84	156.99
01/25/01	2.22	155.00	3.23	154.72	3.84	155.09	5.16	155.31	3.68	156.15
07/09/01	1.93	155.29	2.87	155.08	3.92	155.01	5.19	155.28	3.47	156.36
01/11/02	5.37	151.85	6.02	151.93	7.24	151.69	8.17	152.30	6.15	153.68
07/11/02	5.21	152.01	5.95	152.00	7.71	151.22	8.52	151.95	5.30	154.53
01/21/03	2.25	154.97	3.08	154.87	3.93	155.00	5.37	155.10	4.51	155.32
07/23/03	4.42	152.80	4.90	153.05	6.54	152.39	7.46	153.01	3.99	155.84
01/07/04	3.23	153.99	4.12	153.83	5.68	153.25	5.95	154.52	4.96	154.87
07/12/04	2.51	154.71	3.45	154.50	4.67	154.26	5.65	154.82	3.02	156.81
01/20/05	2.31	154.91	3.25	154.70	3.80	155.13	5.10	155.37	3.97	155.86
07/06/05	2.13	155.09	2.97	154.98	3.83	155.10	5.03	155.44	3.54	156.29
01/28/06	2.80	154.42	4.03	153.92	4.60	154.33	6.10	154.37	5.06	154.77
07/24/06	6.32	150.90	6.90	151.05	8.48	150.45	9.53	150.94	NM	NM
01/29/07	2.70	154.52	3.86	154.09	4.40	154.53	5.75	154.72	NM	NM
07/31/07	2.98	154.24	4.00	153.95	4.63	154.30	4.63	155.84	NM	NM
01/29/08	2.03	155.19	2.92	155.03	3.60	155.33	5.05	155.42	NM	NM
07/24/08	5.30	151.92	6.11	151.84	7.30	151.63	8.37	152.10	4.96	154.87
03/31/09	2.57	154.65	3.91	154.04	4.70	154.23	6.10	154.37	NM	NM
07/22/09	5.39	151.83	6.00	151.95	7.38	151.55	8.37	152.10	NM	NM
01/18/10	2.20	155.02	3.00	154.95	3.47	155.46	4.70	155.77	NM	NM
06/29/10	2.43	154.79	3.25	154.70	3.55	155.38	4.70	155.77	NM	NM
01/17/11	3.01	154.21	5.19	152.76	5.75	153.18	7.39	153.08	NM	NM
07/13/11	4.95	152.27	6.76	151.19	7.99	150.94	8.84	151.63	NM	NM
02/12/12	3.88	153.34	4.98	152.97	5.39	153.54	6.77	153.70	NM	NM
07/10/12	4.09	153.13	4.99	152.96	6.10	152.83	7.23	153.24	NM	NM
10/23/17	3.36	153.86	4.15	153.80	5.20	153.73	6.38	154.09	4.58	155.25
05/23/19	4.00	153.22	4.43	153.52	6.17	152.76	7.37	153.10	5.64	154.19
06/28/22	3.06	154.16	4.01	153.94	4.78	154.15	6.42	154.05	4.70	155.13

NOTES:

All measurements are in feet

DTW = Depth to groundwater measured using an electronic water level indicator

ELEV = Groundwater elevation calculated as follows: TOC Elevation - DTW

NM = Not Measured

Data collected prior to 2017, well elevations, diameters, depths, and screened intervals were obtained from the previous consultant. Data set may not be complete.

No free product has been detected.

AB-5 is a piezometer location.

POC wells include MW-4B, MW-5, MW-6, MW-15, MW-16 and MW-17.

All elevations based on topographic survey dated July 15, 1991.

TABLE B3
MANOR TIMBER COMPANY
KOOL CONSTITUENTS/BTEX
JULY 2006

CONSTITUENT	MW3	MW4B	MW6	MW11	MW15	MW16	MW17	MW18
Naphthalene	<10	69	<10	81	<10	400	840D	450D
Acenaphthene	<10	55	<10	37	79	<94	82	20
Phenanthrene	<10	40	<10	<10	<10	<94	23	<10
Anthracene	<10	<10	<10	<10	<10	<94	<10	<10
Fluoranthene	<10	20	<10	<10	<10	<94	<10	<10
Tetrachlorophenols	<10	<10	<10	<10	<10	<94	<10	<10
Pentachlorophenol	<10	<50	<10	<50	<50	<470	<50	<50
Phenol	<10	59	<10	<10	<10	560	180	49
2-Chlorophenol	<10	<10	<10	<10	<10	<94	<10	<10
2-Methylnaphthalene	<10	34	<10	31	<10	<94	110	33
2,4 Dimethylphenol	<10	75	<10	<10	<10	200	180	150
Fluorene	<10	34	<10	50	51	<94	79	33
O-cresol (2-Methylphenol)	<10	57	<10	<10	<10	200	120	75
Dibenzofuran	<10	29	<10	20	11	<94	45	<10
Carbazole	<10	22	<10	22	19	<94	62	<10
M&P Cresol	<10	92	<10	<10	<10	810	310D	120
Acenaphthylene	<10	<10	<10	<10	<10	<94	<10	<10
KOOL Total	ND	586	ND	241	185¹	2170	2031	930
Acetone	<25	<25	<25	<25	<25	270	<50	35
2 Butanone (MEK)	<10	<10	<10	<10	<10	130	<50	25
Benzene	<1.0	3.8	<1.0	<1.0	<1.0	<10	<5.0	2.9
Toluene	<1.0	2.1	<1.0	25	14	1800	340	180D
Ethylbenzene	<1.0	1.1	<2.0	<1.0	2.6	<10	6.4	34
Xylenes (Total)	<2.0	3.1	<10	<20	<2.0	<20	<10	6.6
4 Methyl - 2 pentanone	<10	<10	<10	<10	<10	<100	<50	<10
2 Hexanone	<10	<10	<10	<10	<10	<100	<50	<10
TOTAL VOCs	ND	10.1	ND	25	16.6	2200	346.4	293.5

NOTE: All constituent concentrations are shown in µg/L, or parts per billion.

ND = Not detected
 D = Diluted sample

¹ 2-Picoline was also detected in MW15 at 25 µg/L.

TABLE B3
MANOR TIMBER COMPANY
KOOL CONSTITUENTS/BTEX
JANUARY 2006

CONSTITUENT	MW3	MW4B	MW6	MW11	MW15	MW16	MW17	MW18
Naphthalene	31	300	LT9.8	LT9.4	21	500	1700	580
Acenaphthene	LT9.6	72	LT9.8	LT9.5	13	LT96	140	LT94
Phenanthrene	LT9.6	LT48	LT9.8	LT9.4	LT10	LT96	LT94	LT94
Anthracene	LT9.6	LT48	LT9.8	LT9.4	LT10	LT96	LT94	LT94
Fluoranthene	LT9.6	LT48	LT9.8	LT9.4	LT10	LT96	LT94	LT94
Tetrachlorophenols	LT9.6	LT48	LT9.8	LT9.4	LT10	LT96	LT94	LT94
Pentachlorophenol	LT48	LT240	LT49	LT47	LT51	LT480	LT470	LT470
Phenol	LT9.6	81	LT9.8	LT9.4	LT10	810	190	150
2-Chlorophenol	LT9.6	LT48	LT9.8	LT9.4	LT10	LT96	LT94	LT94
2-Methylnaphthalene	LT9.6	56	LT9.8	LT9.4	LT10	LT96	180	LT94
2,4 Dimethylphenol	LT9.6	82	LT9.8	LT9.4	LT10	280	280	180
Fluorene	LT9.6	LT48	LT9.8	14	LT10	310	120	LT94
O-cresol (2-Methylphenol)	LT9.6	68	LT9.8	LT9.4	LT10	LT96	160	99
Dibenzofuran	LT9.6	LT48	LT9.8	LT9.4	LT10	LT96	LT94	LT94
Carbazole	LT9.6	LT48	LT9.8	LT9.4	LT10	LT96	96	LT94
M&P Cresol	LT9.6	110	LT9.8	LT9.4	LT10	1200	390	310
Acenaphthylene	LT9.6	LT48	LT9.8	LT9.4	LT10	LT96	LT94	LT94
K001 Total	31	769	-	23.5	34	3220	3256	1319
Acetone	LT25	LT25	LT25	LT25	LT25	LT130	LT130	63
2 Butanone (MEK)	LT10	LT10	LT10	LT10	LT10	82	LT50	75
Benzene	LT1	4.2	LT1	LT1	LT1	LT5.0	LT5.0	2.8
Toluene	LT1	2.0	LT1	LT1	LT1	1500	420	340
Ethylbenzene	LT1	1.7	LT1	LT1	LT1	11	15	36
Xylenes (Total)	LT2	4.0	LT2	LT2	LT2	LT10	20	7.9
4 Methyl - 2 pentanone	LT10	LT10	LT10	LT10	LT10	LT50	LT50	LT20
2 Hexanone	LT10	LT10	LT10	LT10	LT10	LT50	LT50	LT20
TOTAL VOCs	-	11.9	-	-	-	1593	455	524.7

NOTE: All constituent concentrations are shown in µg/L, or parts per billion.
 LT = Less than

TABLE B3
MANOR TIMBER COMPANY
KOOL CONSTITUENTS/BTEX
JULY 2005

CONSTITUENT	MW3	MW4B	MW6	MW11	MW15	MW16	MW17	MW18
Naphthalene	25	390	LT9.9	LT9.4	30	870	820	350
Acenaphthene	LT10	94	LT9.9	LT9.4	26	LT97	LT99	LT47
Phenanthrene	LT10	56	LT9.9	LT9.4	LT9.4	LT97	LT99	LT47
Anthracene	LT10	LT47	LT9.9	LT9.4	LT9.4	LT97	LT99	LT47
Fluoranthene	LT10	LT47	LT9.9	LT9.4	LT9.4	LT97	LT99	LT47
Tetrachlorophenols	LT10	LT47	LT9.9	LT9.4	LT9.4	LT97	LT99	LT47
Pentachlorophenol	LT50	LT240	LT50	LT47	LT47	LT490	LT500	LT240
Phenol	LT10	LT47	LT9.9	LT9.4	LT9.4	1700	170	71
2-Chlorophenol	LT10	LT47	LT9.9	LT9.4	LT9.4	LT97	LT99	LT47
2-Methylnaphthalene	LT10	91	LT9.9	LT9.4	LT9.4	LT97	110	LT47
2,4 Dimethylphenol	LT10	LT47	LT9.9	LT9.4	LT9.4	480	170	LT47
Fluorene	LT10	58	LT9.9	LT9.4	24	130	LT99	LT47
O-cresol (2-Methylphenol)	LT10	LT47	LT9.9	LT9.4	LT9.4	490	120	62
Dibenzofuran	LT10	61	LT9.9	LT9.4	LT9.4	LT97	LT99	LT47
Carbazole	LT10	LT41	LT9.9	LT9.4	LT9.4	LT97	LT99	LT1
M&P Cresol	LT10	LT47	LT9.9	LT9.4	LT9.4	2100	340	160
Acenaphthylene	LT10	LT47	LT9.9	LT9.4	LT9.4	LT97	LT99	LT47
KOOL Total	25	750	-	-	80	5770	1730	643
Acetone	LT25	LT25	LT25	LT25	LT25	LT500	68	LT25
2 Butanone (MEK)	LT10	LT10	LT10	LT10	LT10	LT200	38	LT10
Benzene	LT1	2.0	LT1	LT1	LT1	LT20	4.2	2.3
Toluene	LT1	LT1	LT1	LT1	4.3	1400	250	160
Ethylbenzene	LT1	LT1	LT1	LT1	LT1	LT20	7.2	29
Xylenes (Total)	LT2	2.3	LT2	LT2	LT2	LT40	11	6.1
4 Methyl - 2 pentanone	LT10	LT10	LT10	LT10	LT10	LT200	LT20	LT10
2 Hexanone	LT10	LT10	LT10	LT10	LT10	LT200	LT20	LT10
TOTAL VOCs	-	4.3	-	-	4.3	1400	367.4	197.4

NOTE: All constituent concentrations are shown in µg/L, or parts per billion.
 - = Less than

TABLE B3

**MANOR TIMBER COMPANY
K001 CONSTITUENTS/BTEX
JULY 2004**

CONSTITUENT	MW3	MW4B	MW6	MW11	MW15	MW16	MW17	MW18
Naphthalene	16	500	LT10	LT10	LT10	460	660	430
Acenaphthene	LT10	LT100	LT10	LT10	30	LT100	LT100	LT50
Phenanthrene	LT10	LT100	LT10	LT10	LT10	LT100	LT100	LT50
Anthracene		LT100	LT10	LT10	LT10	LT100	LT100	LT50
Fluoranthene	LT10	LT100	LT10	LT10	LT10	LT100	LT100	LT50
Tetrachlorophenols	LT10	LT100	LT10	LT10	LT10	LT100	LT100	LT50
Pentachlorophenol	LT50	LT500	LT50	LT50	LT50	LT500	LT500	LT250
Phenol	LT10	LT100	LT10	LT10	LT10	970	140	LT50
2-Chlorophenol	LT10	LT100	LT10	LT10	LT10	LT100	LT100	LT50
2-Methylnaphthalene	LT10	LT100	LT10	LT10	LT10	LT100	LT10	LT50
2,4 Dimethylphenol	LT10	LT100	LT10	LT10	LT10	240	120	160
Fluorene	LT10	LT100	LT10	LT10	33	LT100	LT100	LT50
O-cresol	LT10	LT100	LT10	LT10	LT10	260	LT100	120
Dibenzofuran	LT10	LT100	LT10	LT10	LT10	LT100	LT100	LT50
Carbazole	LT10	LT100	LT10	LT10	LT10	LT100	LT100	LT50
M&P Cresol	LT10	LT100	LT10	LT10	LT10	LT100	LT100	LT50
Acenaphthylene	LT10	LT100	LT10	LT10	LT10	LT100	LT100	LT50
K001 Total	16	500	-	-	63	1930	920	710
Acetone	LT25	LT120	LT25	LT25	LT25	LT200	LT250	LT500
2 Butanone (MEK)	LT10	LT50	LT10	LT10	LT10	LT500	LT100	LT200
Benzene	LT1.0	5.1	LT1.0	LT1.0	LT1.0	LT50	LT10	LT20
Toluene	LT1.0	LT5.0	LT1.0	LT1.0	18	1500	360	550
Ethylbenzene	LT1.0	LT5.0	LT1.0	LT1.0	1.1	LT50	LT10	31
Xylenes (Total)	LT2.0	LT10	LT2.0	LT2.0	LT2.0	LT100	LT20	LT40
4 Methyl - 2 pentanone	LT10	LT50	LT10	LT10	LT10	LT500	LT100	LT206
2 Hexanone	LT10	LT50	LT10	LT10	LT10	LT500	LT100	LT200
TOTAL VOCs	-	5.5	-	-	19.1	1500	360	581

O/E: All constituent concentrations are shown in µg/L, or parts per billion.
LT = Less than

TABLE B3

**MANOR TIMBER COMPANY
K001 CONSTITUENTS/BTEX
JANUARY 2004**

CONSTITUENT	MW3	MW4B	MW6	MW11	MW15*	MW16	MW17	MW18
Naphthalene	22	530	LT10	14	32	610	1000	460
Acenaphthene	LT10	100	LT10	18	32	LT100	LT100	LT40
Phenanthrene	LT10	50	LT10	LT10	LT10	LT100	LT100	LT40
Anthracene	LT10	LT50	LT10	LT10	LT10	LT200	LT100	LT40
Fluoranthene	LT10	LT50	LT10	LT10	LT10	LT100	LT100	LT40
Tetrachlorophenols	LT10	LT50	LT10	LT10	LT10	LT100	LT100	LT40
Pentachlorophenol	LT50	LT250	LT50	LT50	LT50	LT500	LT500	LT200
Phenol	LT10	LT50	LT10	LT10	LT10	1100	220	170
2-Chlorophenol	LT10	LT50	LT10	LT10	LT10	LT100	LT100	LT40
2-Methylnaphthalene	LT10	98	LT10	12	LT10	LT100	130	46
2,4 Dimethylphenol	LT10	LT50	LT10	LT10	17	340	190	240
Fluorene	LT10	64	LT10	32	28	100	LT100	46
O-cresol	LT10	LT50	LT10	LT10	LT10	340	120	120
Dibenzofuran	LT10	62	LT10	11	LT10	LT100	LT100	LT40
Carbazole	LT10	LT50	LT10	10	LT10	LT100	LT100	LT40
M&P Cresol	LT10	LT50	LT10	LT10	LT10	1500	340	290
Acenaphthylene	LT10	LT50	LT10	LT10	LT10	LT100	LT100	LT40
K001 Total	22	924	-	97	109	3990	2000	1372
Acetone	LT25	LT25	LT25	LT25	LT25	340	52	LT120
2 Butanone (MEK)	LT10	LT10	LT10	LT10	LT10	220	29	64
Benzene	LT1.0	9.1	LT1.0	LT1.0	LT1.0	LT10	2.7	LT5.0
Toluene	LT1.0	LT1.0	LT1.0	LT1.0	12	1500	190	190
Ethylbenzene	LT1.0	2.7	LT1.0	LT1.0	1.3	15	3.7	24
Xylenes (Total)	LT2.0	4.4	LT2.0	LT2.0	LT2.0	LT20	6.5	LT10
4 Methyl - 2 pentanone	LT10	LT10	LT10	LT10	LT10	LT100	LT20	LT50
2 Hexanone	LT10	LT10	LT10	LT10	LT10	LT100	LT20	LT50
TOTAL VOCs	-	16.2	-	-	13.3	2075	283.9	278

NOTE: All constituent concentrations are shown in µg/L, or parts per billion.
LT = Less than

TABLE B3
MANOR TIMBER COMPANY
KOOL CONSTITUENTS/BTEX
JULY 2003

CONSTITUENT	MW3	MW4B	MW6	MW11	MW15*	MW16	MW17	MW18
Naphthalene ✓	30	1000	LT10	120	70	990	700	680
Acenaphthene ✓	LT10	LT200	LT10	34	56	LT200	LT100	LT100
Phenanthrene ✓	LT10	LT200	LT10	LT10	LT10	LT200	LT100	LT100
Anthracene ✓	LT10	LT200	LT10	LT10	LT10	LT200	LT100	LT100
Fluoranthene ✓	LT10	LT200	LT10	LT10	LT10	LT200	LT100	LT100
Tetrachlorophenols ✓	LT10	LT200	LT10	LT10	LT10	LT200	LT100	LT100
Pentachlorophenol ✓	LT50	LT1000	LT50	LT50	LT50	LT1000	LT500	LT500
Phenol ✓	LT10	LT200	LT10	LT10	LT10	2400	180	100
2-Chlorophenol ✓	LT10	LT200	LT10	LT10	LT10	LT200	LT100	LT100
2-Methylnaphthalene ✓	LT10	LT200	LT10	33	13	LT200	LT100	LT100
2,4 Dimethylphenol ✓	LT10	LT200	LT10	LT50	20	530	130	250
Fluorene	LT10	LT200	LT10	50	51	LT200	LT100	LT100
O-cresol	LT10	LT200	LT10	LT10	LT10	560	LT100	LT100
Dibenzofuran	LT10	LT200	LT10	18	11	LT10	LT100	LT100
Carbazole	LT10	LT200	LT10	22	LT10	LT200	LT100	LT100
M&P Cresol	LT10	LT200	LT10	LT10	LT10	2400	260	230
Acenaphthylene	LT10	LT200	LT10	LT10	LT10	LT200	LT100	LT100
KOOL Total	30	1000	-	227	234	6880	1270	1160
Acetone	LT25	LT25	LT25	LT25	27H	490	56	LT120
2 Butanone (MEK)	LT10	LT10	LT10	LT10	LT10	350	31	LT50
Benzene ✓	LT1.0	14	LT1.0	LT1.0	LT1.0	LT10	3.9	LT5.0
Toluene ✓	LT1.0	LT1.0	LT1.0	6.8	59	1700	240	350
Ethylbenzene ✓	LT1.0	3.9	LT1.0	LT1.0	2.4	19	4.8	32
Xylenes (Total)	LT2.0	5.2	LT2.0	LT2.0	LT2.0	LT2.0	7.2	LT10
4 Methyl - 2 pentanone	LT10	LT10	LT10	LT10	LT10	LT100	LT20	LT50
2 Hexanone	LT10	LT10	LT10	LT10	LT10	LT100	LT20	LT50
TOTAL VOCs	-	23.1	-	6.8	88.4	2559	342.9	382

NOTE: All constituent concentrations are shown in µg/L, or parts per billion.

LT = Less than

* also detected 2-picoline at 13 µg/l.

TABLE B3

**MANOR TIMBER COMPANY
K001 CONSTITUENTS/BTEX
JANUARY 2002**

CONSTITUENT	MW3	MW4B	MW6	MW11	MW15	MW16	MW17	MW18
Naphthalene	33	350	18	24	74	950	940	430
Acenaphthene	LT10	59	LT10	12	60	LT200	88	LT40
Phenanthrene	LT10	LT50	LT10	LT10	LT10	LT200	LT50	LT40
Anthracene	LT10	LT50	LT10	LT10	LT10	LT200	LT50	LT40
Fluoranthene	LT10	LT50	LT10	LT10	LT10	LT200	LT50	LT40
Tetrachlorophenols	LT10	LT50	LT10	LT10	LT10	LT200	LT50	LT40
Pentachlorophenol	LT50	LT250	LT50	LT50	LT50	LT1000	LT250	LT200
Phenol	LT10	LT50	LT10	LT10	LT10	2700	250	LT40
2-Chlorophenol	LT10	LT50	LT10	LT10	LT10	LT200	LT200	LT40
2-Methylnaphthalene	LT10	65	LT10	LT10	14	LT200	120	LT40
2,4 Dimethylphenol	LT10	LT50	LT10	LT10	27	630	200	170
Fluorene	LT10	LT50	LT10	14	52	LT200	66	LT50
O-cresol	LT10	LT50	LT10	LT10	14	LT200	140	83
Dibenzofuran	LT10	LT50	LT10	LT10	15	LT200	54	LT40
Carbazole	LT10	LT50	LT10	LT10	18	LT200	LT68	LT40
M&P Cresol	LT10	LT50	LT10	LT10	LT10	2800	360	97
Acenaphthylene	LT10	LT50	LT10	LT10	LT10	LT200	LT50	LT54
K001 Total	33	474	18	50	274	7080	2286	780
Acetone	LT25	LT25	LT25	LT25	LT25	1200	270	LT50
2 Butanone (MEK)	LT25	LT25	LT25	LT25	LT25	570	88	LT25
Benzene	LT5	13	LT5	LT5	LT5	LT50	5.6	LT10
Toluene	LT5	LT5	LT5	LT5	8.0	1600	160	280
Ethylbenzene	LT5	LT5	LT5	LT5	LT5	LT50	7.4	26
Xylenes (Total)	LT10	LT10	LT10	LT10	LT10	LT200	LT20	LT20
4 Methyl - 2 pentanone	LT25	LT25	LT25	LT25	LT25	LT250	LT25	LT50
2 Hexanone	LT25	LT25	LT25	LT25	LT25	LT250	LT25	LT50
TOTAL VOCs	-	13	-	-	8	3370	531	306

NOTE: All constituent concentrations are shown in µg/L, or parts per billion.
= Less than

TABLE B3
MANOR TIMBER COMPANY
KO01 CONSTITUENTS/BTEX
JULY 2001

CONSTITUENT								
	MW3	MW4B	MW6	MW11	MW15	MW16	MW17	MW18
Naphthalene	56	510	LT10	LT10	94	520	1900	300
Acenaphthene	LT10	62	LT10	LT10	46	LT200	LT200	LT50
Phenanthrene	LT10	LT50	LT10	LT10	LT10	LT200	LT200	LT50
Anthracene	LT10	LT50	LT10	LT10	LT10	LT200	LT200	LT50
Fluoranthene	LT10	LT50	LT10	LT10	LT10	LT200	LT200	LT50
Tetrachlorophenols	LT10	LT50	LT10	LT10	LT10	LT200	LT200	LT50
Pentachlorophenol	LT50	LT250	LT50	LT50	LT50	LT1000	LT1000	LT250
Phenol	LT10	LT50	LT10	LT10	LT10	1300	530	LT50
2-Chlorophenol	LT10	LT50	LT10	LT10	LT10	LT200	LT200	LT50
2-Methylnaphthalene	LT10	68	LT10	LT10	17	LT200	210	LT50
2,4 Dimethylphenol	LT10	LT50	LT10	LT10	12	300	340	210
Fluorene	LT10	LT750	LT10	LT10	60	LT200	LT200	LT50
O-cresol	LT10	LT50	LT10	LT10	LT10	320	230	91
Dibenzofuran	LT10	LT50	LT10	LT10	14	LT200	LT200	LT50
Carbazole	LT10	LT50	LT10	LT10	24	LT200	LT200	LT50
M&P Cresol	LT10	LT50	LT10	LT10	LT10	1500	690	140
Acenaphthylene	LT10	LT50	LT10	LT10	LT10	LT200	LT200	LT50
KO01 Total	56	640	-	-	267	3940	3900	741
Acetone	LT25	LT25	LT25	LT25	LT25	1100	190	LT50
2 Butanone (MEK)	LT25	LT25	LT25	LT25	LT25	LT500	77	LT50
Benzene	LT5	17	LT5	LT5	LT5	LT100	LT10	LT10
Toluene	LT5	LT5	LT5	LT5	LT5	2000	210	200
Ethylbenzene	LT5	LT5	LT5	LT5	LT5	LT100	LT10	16
Xylenes (Total)	LT10	LT10	LT10	LT10	LT10	LT200	LT20	LT20
4 Methyl - 2 pentanone	LT25	LT25	LT25	LT25	LT25	LT500	LT50	LT50
2 Hexanone	LT25	LT25	LT25	LT25	LT25	LT500	LT50	LT50
TOTAL VOCs	-	17	-	-	-	3100	477	216

NOTE: All constituent concentrations are shown in µg/L, or parts per billion.

LT = Less than

*F35= Due to analyte abundance, target compound concentrations are reported from multiple runs to achieve requested detection limits.

TABLE B3
MANOR TIMBER COMPANY
KO01 CONSTITUENTS/BTEX
JANUARY 2000

CONSTITUENT								
	MW3	MW4B	MW6	MW11	MW15	MW16	MW17	MW18
Naphthalene	83	470	45	220	25	610	2200	330
Acenaphthene	LT10	LT50	18	78	31	LT100	240	LT50
Phenanthrene & Anthracene	LT10	LT10	LT10	11	LT10	LT100	LT100	LT50
Fluoranthene	LT10	LT50	LT10	LT10	LT10	LT100	LT100	LT50
Tetrachlorophenols	LT10	LT50	LT10	LT10	LT10	LT100	LT100	LT50
Pentachlorophenol	LT50	LT250	LT50	LT50	LT50	LT500	LT500	LT250
Phenol	LT10	LT50	LT10	LT10	LT10	2300	850	LT50
2-Chlorophenol	LT10	LT50	LT10	LT10	LT10	LT100	LT100	LT50
2-Methylnaphthalene	LT10	54	LT10	70	LT10	LT100	350	LT50
2,4 Dimethylphenol	LT10	LT50	13	14	70	490	570	100
Fluorene	LT10	LT50	27	100	30	LT100	160	LT50
O-cresol	LT10	LT50	LT10	12	34	2900	1600	56
Dibenzofuran	LT10	LT50	LT10	54	LT10	LT100	140	LT50
Carbazole	LT10	51	LT10	62	11	LT100	220	LT50
M&P Cresol	LT10	LT50	LT10	LT10	LT10	LT100	LT100	LT50
Acenaphthylene	LT10	LT50	LT10	LT10	LT10	LT50	LT100	LT50
KO01 Total	83	575	103	521	201	6300	6330	486
Acetone	LT5.0	LT5.0	LT5.0	LT5.0	LT5.0	800	410	LT5.0
2 Butanone (MEK)	LT5.0	LT5.0	LT5.0	LT5.0	LT5.0	390	138	LT5.0
Benzene	LT5.0	19	LT5.0	LT10	LT5.0	LT25	16	LT5.0
Toluene	LT5.0	LT5.0	LT5.0	230	8.4	880	200	200
Ethylbenzene	LT5.0	LT5.0	LT5.0	LT10	LT5.0	LT25	17	14
Xylenes (Total)	LT10	LT10	LT10	LT20	LT10	LT50	36	LT10
4 Methyl - 2 pentanone	LT25	LT25	LT25	LT50	LT25	LT120	LT25	LT25
2 Hexanone	LT25	LT25	LT25	LT25	LT25	LT120	25	LT25
TOTAL VOCs	-	19	-	230	8.4	2070	834	214

NOTE: All constituent concentrations are shown in µg/L, or parts per billion.
 ? = Less than

TABLE B3

MANOR TIMBER COMPANY
K001 CONSTITUENTS/BTEX
JULY 1999

CONSTITUENT	WELL						
	MW3	MW4B	MW11	MW15	MW16	MW17	MW18
Naphthalene	98	1400	210	41	550	4500	12
Acenaphthene	LT10	95	72	18	LT50	450	LT10
Phenanthrene & Anthracene	LT10	54	LT10	LT10	LT50	LT200	LT10
Fluoranthene	LT10	LT40	LT10	LT10	LT50	LT200	LT10
Tetrachlorophenols	LT10	LT40	LT10	LT10	LT50	LT200	LT10
Pentachlorophenol	LT50	LT200	LT50	LT50	LT250	LT1000	LT50
Phenol	LT10	LT40	LT10	LT10	LT50	1400	LT10
2-Chlorophenol	LT10	LT40	LT10	LT10	LT50	1400	LT10
2-Methylnaphthalene	LT10	130	71	LT10	52	680	LT10
2,4 Dimethylphenol	LT10	LT40	14	13	290	900	73
Fluorene	LT10	52	100	21	80	290	17
O-cresol	LT10	LT40	LT10	LT10	340	660	63
Dibenzofuran	LT10	67	44	LT10	LT50	270	LT10
Carbazole	LT10	96	56	10	LT50	370	LT10
M&P Cresol	LT10	LT40	LT10	LT10	1500	2000	42
Acenaphthylene	LT10	LT40	LT10	LT10	LT50	LT200	LT10
K001 Total	98	1894	567	103	2812	11520	207
Benzene	LT5.0	14	LT5.0	LT5.0	LT25	22	LT5.0
Toluene	LT5.0	LT5.0	140	11	790	200	140
Ethylbenzene	LT5.0	6.0	LT5.0	LT5.0	LT25	24	9.4
Xylenes (Total)	LT10	16	LT10	LT10	LT50	56	LT10
4 Methyl - 2 pentanone	LT25	LT25	LT25	LT25	LT120	LT50	LT25
2 Hexanone	LT25	LT25	LT25	LT25	LT120	52	LT25
TOTAL VOCs	-	36	140	11	790	354	149.4

NOTE: All constituent concentrations are shown in ug/L, or parts per billion.
LT = Less than

TABLE B3

MANOR TIMBER COMPANY
 KO01 CONSTITUENTS/BTEX
 JANUARY 1998

CONSTITUENT	WELL						
	MW3	MW4B	MW11	MW15	MW16	MW17	MW18
Naphthalene	120	2400	110	68	970	4400	68
Acenaphthene	LT10	170	46	31	LT200	<500	LT10
Phenanthrene & Anthracene	LT10	LT10	70	LT10	LT200	LT500	LT10
Fluoranthene	LT10	LT10	LT10	LT50	LT200	LT400	LT10
Tetrachlorophenols	LT50	60	LT50	LT50	LT1000	LT2500	LT50
Pentachlorophenol	LT50	60	LT50	LT50	LT1000	LT2500	LT50
Phenol	LT10	LT10	LT10	LT10	2100	740	46
2-Chlorophenol	LT10	LT10	LT10	LT10	LT200	LT500	LT10
2-Methylaaphthalene	LT10	230	40	13	LT200	590	LT10
2,4 Dimethylphenol	LT10	LT10	LT10	44	290	570	39
Fluorene	LT10	97	72	61	LT200	LT500	LT10
-cresol	LT10	LT10	LT10	24	570	LT500	27
Dibenzofuran	LT10	100	27	10	LT200	LT500	LT10
Carbazole	LT10	120	31	15	LT200	LT500	LT10
Acenaphthylene	LT10	LT10	LT10	LT10	LT200	LT500	LT10
M&P Cresol	LT10	LT10	LT10	LT10	2600	890	66
KO01 Total	120	3237	396	266	6530	7190	246
Benzene	LT5.0	LT5.0	LT5.0	LT5.0	LT50	13	LT5.0
Toluene	LT5.0	LT5.0	5.7	110	570	120	100
Ethylbenzene	LT5.0	5.1	LT5.0	LT5.0	LT50	22	5.2
Xylenes (Total)	LT5.0	17	LT5.0	LT5.0	LT50	54	LT5.0
Acetone	LT50	LT50	LT50	LT50	800	210	LT50
MEK	LT25	LT25	LT25	LT25	590	72	25
TOTAL VOCs	LT	22.1	5.7	110	1960	491	130.2

NOTE: All constituent concentrations are shown in ug/L, or parts per billion.
 LT = Less than

TABLE B3
MANOR TIMBER COMPANY
KO01 CONSTITUENTS/BTEX
JANUARY 1997

CONSTITUENT	WELL						
	MW3	MW4B*	MW11	MW15	MW16*	MW17*	MW18
Naphthalene	210	1500	140	LT10	760	LT2500	150
Acenaphthene	LT20	200	66	18	LT200	550	LT10
Phenanthrene & Anthracene	LT20	LT20	LT10	LT10	LT200	LT500	LT10
Fluoranthene	LT20	LT20	LT10	LT10	LT200	LT500	LT10
Tetrachlorophenols	LT100	LT500	LT50	LT50	LT1000	LT2500	LT50
Pentachlorophenol	LT100	LT500	LT50	LT50	LT1000	LT2500	LT50
Phenol	LT20	LT100	LT10	16	2200	1100	35
2-Chlorophenol	LT20	LT100	LT10	LT10	LT200	LT500	LT10
2-Methylnaphthalene	NR	NR	NR	NR	NR	NR	NR
2,4 Dimethylphenol	LT100	LT500	LT50	58	340	600	50
Fluorene	NR	NR	NR	NR	NR	NR	NR
O-cresol	NR	NR	NR	NR	NR	NR	NR
Dibenzofuran	NR	NR	NR	NR	NR	NR	NA
Carbazole	LT20	190	62	LT10	LT200	LT500	LT10
Acenaphthylene	LT20	LT100	LT10	LT10	LT200	LT500	LT10
KO01 Total	210	1890	268	92	3300	3560	235
Benzene	LT1.0	3.1	LT1.0	LT5.0	LT10	25	LT10
Toluene	LT1.0	4.5	22	170	580	130	60
Ethylbenzene	LT1.0	6.4	LT1.0	LT5.0	18	31	5.5

TABLE B3

CONSTITUENT	WELL						
	MW3	MW4B*	MW11	MW15	MW16*	MW17*	MW18
Xylenes (Total)	LT2.0	27	LT2.0	LT10	LT20	86	1.7
Acetone	NR	NA	NA	NA	NA	NR	NA

* Elevated detection limits for EPA Method 8270 analysis in wells MW4B, MW16, MW17
(see laboratory data sheets)

NOTE: All constituent concentrations are shown in ug/l or parts per billion.

NR = Not Reported
NA = Not Analyzed
LT = Less than

TABLE B3

**MANOR TIMBER COMPANY
K001 CONSTITUENTS/BTEX
JULY 1996**

CONSTITUENT	WELL					
	MW3	MW4B	MW11	MW15	MW16	MW17
Naphthalene	110 ²	2000	200	170	44	4000
Acenaphthene	ND ³	200	65	58	ND	ND
Phenanthrene & Anthracene	ND	ND	ND	ND	ND	ND
Fluoranthene	ND	ND	ND	ND	ND	ND
Tetrachlorophenols	ND	ND	ND	ND	ND	ND
Pentachlorophenol	ND	ND	ND	ND	ND	ND
Phenol	ND	ND	ND	ND	1500	1200
2-Chlorophenol	ND	ND	ND	ND	ND	ND
2-Methylnaphthalene	ND	ND	ND	ND	ND	ND
2,4 Dimethylphenol	ND	ND	ND	99	220	790
Fluorene	ND	ND	ND	ND	140	ND
O-cresol	ND	ND	ND	ND	ND	ND
Dibenzofuran	ND	ND	ND	ND	ND	ND
Carbazole	ND	310	50	59	ND	ND
Acenaphthylene	ND	ND	ND	ND	ND	ND
K001 Total	110	2510	315	386	1904	5990
Benzene	ND	5.1	ND	ND	ND	37
Toluene	ND	6.4	52	260	510	130
Ethylbenzene	ND	ND	ND	ND	ND	34
Xylenes (Total)	ND	16	ND	ND	ND	ND
Acetone	ND	ND	ND	ND	740	1500

¹ Elevated detection limit for EPA Method 8270 analysis in wells MW4B, MW15, MW16, and MW17 (see Laboratory Data Sheets)

² All constituent concentrations are given in ug/l, or parts per billion.

³ ND = Non-detect.

TABLE B3
MANOR TIMBER COMPANY

KO01 CONSTITUENTS/BTEX
17 JANUARY 1996

CONSTITUENT	WELL					
	MW3	MW4B	MW11	MW15	MW16 ¹	MW17
Naphthalene	140 ²	2500	150	ND	810	5600
Acenaphthene	ND ³	280	54	ND	ND	540
Phenanthrene & Anthracene	ND	ND	ND	ND	ND	ND
Fluoranthene	ND	ND	ND	ND	ND	ND
Tetrachlorophenols	ND	ND	ND	ND	ND	ND
Phenol	ND	ND	ND	35	2000	1400
Pentachlorophenol	ND	ND	ND	ND	ND	ND
2-Chlorophenol	ND	ND	ND	ND	ND	ND
2-Methylnaphthalene	ND	ND	ND	ND	ND	ND
2,4 Dimethylphenol	ND	ND	13	23	ND	920
Fluorene	ND	ND	ND	ND	ND	ND
Carbazol	ND	240	30	ND	ND	530
Acenaphthylene	ND	ND	ND	ND	ND	ND
KO01 Total	140	3020	247	58	2810	8990
Benzene	ND	ND	ND	ND	ND	ND
Toluene	ND	5.8	39	6.3	1400	150
Ethylbenzene	ND	5.1	ND	ND	ND	30
Xylenes (Total)	ND	19	ND	ND	ND	73

¹ MEK was also detected at 320 ppb.

² All constituent concentrations are given in ug/l, or parts per billion.

³ ND = Non-detect.

Table B4. Groundwater Analytical Summary (VOCs)

**Manor Timber Company
Manor, Clinch County, GA
Permit Number: HW-047(D)**

Well Number	Sample Date	Acetone	Benzene	Ethyl- benzene	2- Hexanone	Methyl Ethyl Ketone*	4-Methyl 2- Pentanone	Toluene	Xylenes (Total)	Styrene**	TOTAL
MW-3	Jan. 96		ND	ND				ND	ND	NA	ND
	Jul. 96	ND	ND	ND				ND	ND	NA	ND
	Jan. 97		<1	<1				<1	<2	NA	ND
	Jul. 97	<50	<5	<5		<25		<5	<5	NA	ND
	Jan. 98	<50	<5	<5		<25		<5	<5	NA	ND
	Jul. 98		<5	<5	<25		<25	<5	<5	NA	ND
	Jan. 99		<5	<5	<25		<25	<5	<5	NA	ND
	Jul. 99		<5	<5	<25		<25	<5	<10	NA	ND
	Jan. 00	<5	<5	<5	<25	<5	<25	<5	<10	NA	ND
	Jul. 00	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 01	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 01	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 02	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 02	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 03	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 03	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 04	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 04	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 05	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 06	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 07	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 07	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 08	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 08	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 09	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
Jul. 09	<23	<10	<1		<25		<1	<2	NA	ND	
7/7/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND	
1/17/11	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND	
8/7/14	<25	<1	<1	<10	<10	<10	<5	<1	<3	NA	ND
10/25/17	<25	<1	<1	<10	<10	<10	<10	<1	<3	NA	ND
5/25/19	<25	<1	<1	<5	<5	5.5	<1	<2	NA	5.5	
6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND	
MW-3B	1/8/10	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	7/10/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	8/7/14	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	10/25/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	5/25/19	<25	<1	<1	<5	<5	5.7	<1	<2	NA	5.7
	6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND
MW-4B	Jan. 96		ND	5.1				5.8	19	NA	29.9
	Jul. 96	ND	5.1	ND				6.4	16	NA	27.5
	Jan. 97		3.1	6.4				4.5	27	NA	41
	Jul. 97	<50	<5	5.3		<25		5.7	18	NA	29
	Jan. 98	<50	<5	5.1		<25		<5	17	NA	22.1
	Jul. 98		<5	6.2	<25		<25	<5	21	NA	27.2
	Jan. 99		8.2	<5	<25		<25	<5	7.4	NA	15.6
	Jul. 99		14	6	<25		<25	<5	16	NA	36
	Jan. 00	<5	19	<5	<25	<5	<25	<5	<10	NA	19
	Jul. 00	<25	23	7.9	<25	<25	<25	<5	<10	NA	30.9
	Jan. 01	<25	16	5	<25	<25	<25	<5	<10	NA	21
	Jul. 01	<25	17	<5	<25	<25	<25	<5	<10	NA	17
	Jan. 02	<25	13	<5	<25	<25	<25	<5	<10	NA	13
	Jul. 02	<25	13	<5	<25	<25	<25	<5	<10	NA	13
	Jan. 03	<25	21	7.1	<25	<25	<25	<5	<10	NA	28.1
Jul. 03	<25	14	3.9	<10	<10	<10	<1	5.2	NA	23.1	
Jan. 04	<25	9.1	2.7	<10	<10	<10	<1	4.4	NA	16.2	
Jul. 04	<120	5.1	<5	<50	<50	<50	<5	<10	NA	5.1	
Jan. 05	<25	3.3	1.2	<10	<10	<10	<1	2.5	NA	7.0	

Table B4. Groundwater Analytical Summary (VOCs)

**Manor Timber Company
Manor, Clinch County, GA
Permit Number: HW-047(D)**

Well Number	Sample Date	Acetone	Benzene	Ethyl- benzne	2- Hexanone	Methyl Ethyl Ketone*	4-Methyl 2- Pentanone	Toluene	Xylenes (Total)	Styrene**	TOTAL
MW-4B	Jul. 06	<25	3.8	1.1	<10	<10	<10	2.1	3.1	NA	10.1
	Jan. 07	34	17	5	<10	<10	<10	10	9.4	NA	75.4
	Jul. 07	<25	8	2.5	<10	<10	<10	3	4.9	NA	18.4
	Jan. 08	<25	8.8	3	60	NR	<10	4	6.2	NA	82
	Jul. 08	<50	9.2	3.4	<20	<20	<20	21	7.6	NA	41.2
	Jan. 09	<25	5.51	1.7				1.06	1.28	NA	9.55
	Jul. 09		BRL								ND
	1/8/10	<25	3.03	<1	1.22	<10	<10	<1	<3	NA	4.25
	7/7/10	<125		<5	<50	<50	<50	<5	<15	NA	ND
	1/17/11	<25	2.84	1.31	<10	<10	<5	2.3	1.13	NA	7.58
	2/12/12	<25	1.58	<1	<10	<10	<10	<1	<3	NA	1.58
	7/10/12	<25	<5	<5	<50	<50	<50	<5	<15	NA	ND
	2/18/13	<25	2.08	<1	<10	<10	<5	<1	<3	NA	2.08
	8/21/13	<25	1.36	<1	<10	<10	<5	<1	<3	NA	1.36
	2/24/14	<25	1.63	<1	<10	<10	<5	<1	<3	NA	1.63
	8/8/16	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/9/15	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	8/11/15	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/12/16	<25	<1	<1	<10	<10	<1	<1	<3	NA	ND
	10/26/17	<25	1.3	1.1	<10	<10	<10	<1	<3	NA	2.4
5/25/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND	
6/29/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND	
MW-5	1/8/10	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	7/10/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	8/7/14	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	10/25/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	5/24/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND
	6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND
MW-6	Jan. 00	<5	<5	<5	<25	<5	<25	<5	<10	NA	ND
	Jul. 00	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 01	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 01	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 02	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 02	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 03	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 03	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 04	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 04	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 05	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 06	<25	<1	<2	<10	<10	<10	<1	<10	NA	ND
	Jan. 07	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 07	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 08	<25	<1	<1	<10	NR	<10	<1	<2	NA	ND
	Jul. 08	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	1/8/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	1/17/11	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	7/10/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	8/7/14	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
10/25/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND	
5/25/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND	
6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND	
MW-7	7/6/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	7/10/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	8/7/14	<25	<1	<1	<10	<2	<5	<1	<3	NA	ND
	10/23/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	5/24/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND
6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND	

Table B4. Groundwater Analytical Summary (VOCs)

**Manor Timber Company
Manor, Clinch County, GA
Permit Number: HW-047(D)**

Well Number	Sample Date	Acetone	Benzene	Ethyl- benzne	2- Hexanone	Methyl Ethyl Ketone*	4-Methyl 2- Pentanone	Toluene	Xylenes (Total)	Styrene**	TOTAL
MW-8	7/6/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	7/10/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	8/7/14	<25	<1	<1	<10	<2	<5	<1	<3	NA	ND
	10/25/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	5/23/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND
MW-9	6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND
	7/6/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	2/12/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	7/10/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	2/18/13	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	8/21/13	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/24/14	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	8/8/14	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/9/15	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	8/11/15	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/12/16	<25	<1	<1	<10	<2	<5	<1	<3	NA	ND
	10/25/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	5/24/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND
	6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND
	MW-10	7/6/10	<25	<1	<1	<10	<10	<10	<1	<3	NA
7/10/12		<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
8/7/14		<25	<1	<1	<10	<2	<5	<1	<3	NA	ND
10/25/17		<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
5/24/19		<25	<1	<1	<5	<5	<5	<1	<2	NA	ND
MW-11	6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND
	Jan. 96	ND	ND	ND				39	ND	NA	39
	Jul. 96	ND	ND	ND				52	ND	NA	52
	Jan. 97		<1	<1				22	<2	NA	22
	Jul. 97	<50	<5	<5		<25		8.2	<5	NA	8.2
	Jan. 98	<50	<5	<5		<25		5.7	<5	NA	5.7
	Jul. 98		<5	<5	<25		<25	19	<5	NA	19
	Jan. 99		<5	<5	<25			51	<5	NA	51
	Jul. 99		<5	<5	<25		<25	140	<10	NA	140
	Jan. 00	<5	<10	<10	<25	<5	<50	230	<20	NA	230
	Jul. 00	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 01	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 01	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 02	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 02	<25	<5	<5	<25	<25	<25	75	<10	NA	75
	Jan. 03	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 03	<25	<1	<1	<10	<10	<10	6.8	<2	NA	6.8
	Jan. 04	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 04	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 05	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jul. 06	<25	<1	<1	<10	<10	<10	25	<20	NA	25
	Jan. 07	<23	<1	1.1	<10	<10	<10	2.5	<2	NA	3.6
	Jul. 07	<25	<1	<1	<10	<10	<10	<1	<2	NA	ND
	Jan. 08	<25	<1	<1	<10	NR	<10	<1	<2	NA	ND
	Jul. 08	<25	<1	<1	<10	NR	<10	<1	<2	NA	ND
Jan. 09										ND	
Jul. 09	<25	<1	<10		<10		<1	<2	NA	ND	
1/8/10	<25	<1	<1	7.24	<10	<10	<1	<2	NA	7.24	
7/7/10	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND	
1/17/11	<25	<1	<1	<10	<10	<10	3.03	<2	NA	3.03	
2/12/12	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND	
7/10/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND	
2/18/13	<25	<1	<1	<10	<10	<5	1.1	<3	NA	1.1	

Table B4. Groundwater Analytical Summary (VOCs)

**Manor Timber Company
Manor, Clinch County, GA
Permit Number: HW-047(D)**

Well Number	Sample Date	Acetone	Benzene	Ethyl- benzne	2- Hexanone	Methyl Ethyl Ketone*	4-Methyl 2- Pentanone	Toluene	Xylenes (Total)	Styrene**	TOTAL
MW-11	8/21/13	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/24/14	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	8/8/14	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/9/15	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	8/11/15	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/12/16	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	10/25/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	5/24/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND
MW-12	6/29/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND
	7/6/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	10/23/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
MW-13	5/23/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND
	7/6/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
MW-14	10/23/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	5/24/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND
	7/6/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
MW-15	Jan. 96	ND	ND	ND				6.3	ND	NA	6.3
	Jul. 96	ND	ND	ND				260	ND	NA	260
	Jan. 97		<5	<5				170	<10	NA	170
	Jul. 97	63	<5	<5		<25		460	<5	NA	523
	Jan. 98	<50	<5	<5		<25		110	<5	NA	110
	Jul. 98		<5	<5	<25		<25	79	<5	NA	79
	Jan. 99		<5	<5	<25			63	<5	NA	63
	Jul. 99		<5	<5	<25		<25	11	<10	NA	11
	Jan. 00	<5	<5	<5	<25	<5	<25	8.4	<10	NA	8.4
	Jul. 00	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 01	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 01	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 02	<25	<5	<5	<25	<25	<25	8	<10	NA	8
	Jul. 02	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jan. 03	<25	<5	<5	<25	<25	<25	<5	<10	NA	ND
	Jul. 03	27	<1	2.4	<10	<10	<10	59	>2	NA	88.4
	Jan. 04	<25	<1	1.3	<10	<10	<10	12	<2	NA	13.3
	Jul. 04	<25	<1	1.1	<10	<10	<10	18	<2	NA	19.1
	Jan. 05	<25	<1	<1	<10	<10	<10	3.3	<2	NA	3.3
	Jul. 06	<25	<1	2.6	<10	<10	<10	14	<2	NA	16.6
	Jan. 07	<25	<1	<1	<10	<10	<10	1	<2	NA	1
	Jul. 07	<25	<1	<1	<10	<10	99	3.2	>2	NA	102.2
	Jan. 08	<25	<1	<1	<10	<10	NR	<1	<2	NA	ND
	Jul. 08	<25	<1	1.9	<10	<10	<10	3.6	<2	NA	5.5
	Jan. 09	<25	<1	<1		<10		<25	<2	NA	ND
	Jul. 09	BRL	BRL	1.47		BRL		2.96	BRL	NA	4.43
	1/8/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	7/7/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	1/17/11	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	7/10/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
8/8/14	<25	<1	<1	<10	<10	<5	1.13	<3	NA	1.13	
10/25/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND	
5/25/19	<25	<1	<1	<1	<5	<5	<5	1.1	<2	NA	1.1
6/29/22	<50	<5	<5	<5	<10	<50	<10	<5	<5	NA	ND

Table B4. Groundwater Analytical Summary (VOCs)

**Manor Timber Company
Manor, Clinch County, GA
Permit Number: HW-047(D)**

Well Number	Sample Date	Acetone	Benzene	Ethyl- benzne	2- Hexanone	Methyl Ethyl Ketone*	4-Methyl 2- Pentanone	Toluene	Xylenes (Total)	Styrene**	TOTAL
MW-16	Jan. 96		ND	ND				1400	ND	NA	1400
	Jul. 96	740	ND	ND				510	ND	NA	1250
	Jan. 97		<10	18				580	<20	NA	598
	Jul. 97	870	<10	<10		900		620	<10	NA	2390
	Jan. 98	800	<50	<50		590		570	<50	NA	1960
	Jul. 98		<5	<5	<25		<25	180	<50	NA	180
	Jan. 99		<50	<50	<25		<25	830	<50	NA	830
	Jul. 99		<25	<25	<120		<120	790	<50	NA	790
	Jan. 00	800	<25	<25	<120	390	<120	880	<50	NA	2070
	Jul. 00	130	<10	<10	<50	91	<50	370	<20	NA	591
	Jan. 01	<250	<50	<50	<250	<250	<250	1800	<100	NA	1800
	Jul. 01	1100	<100	<100	<500	<500	<500	2000	<200	NA	3100
	Jan. 02	1200	<50	<50	<250	570	<250	1600	<200	NA	3370
	Jul. 02	540	<50	<50	<250	310	<250	1400	<100	NA	2250
	Jan. 03	370	<10	18	<100	210	<100	1800	<10	NA	2398
	Jul. 03	490	<10	19	<100	350	<100	1700	<2	NA	2559
	Jan. 04	340	<10	15	<100	220	<100	1500	<20	NA	2075
	Jul. 04	<200	<50	<50	<500	<500	<500	1500	<100	NA	1500
	Jan. 05	<620	<25	<25	<250	<250	<250	1600	<50	NA	1600
	Jul. 06	270	<10	<10	<100	130	<100	1800	<20	NA	2200
	Jan. 07	200	<2	10	<20	110	<20	1400D	<4	NA	1720
	Jul. 07	<500	<20	<20	<200	<200	<200	2100	<40	NA	2100
	Jan. 08	180	<1	12	10	NR	<10	1800D	4.1	NA	2006.1
	Jul. 08	<500	<20	<20	<200	<200	<200	2100	<40	NA	2100
	Jan. 09	<500	<200	<20	<200	<200	<200	1030	<40	NA	1030
	Jul. 09	BRL	BRL	BRL		BRL		2040	BRL	NA	2040
	1/8/10	<25	<1	<1	<10	<10	<10	1310	10.7	NA	1320.7
1/17/11	<25	<1	<1	<10	<10	<10	1020	<30	NA	1020	
7/10/12	110	<5	7.2	<10	35		1500	<5	NA	1652.2	
8/8/14	<500	<20	<20	<200	<200	<100	1680	<60	NA	1680	
10/26/17	<250	<10	11.0	<100	<100	<100	1500	<30	NA	1511	
5/25/19	124	<1	9.2	<5	62.6	<5	1240	3.2	NA	1439	
5/25/2019 (DUP-1)	125	<1	9.3	<5	62.1	<5	1300	3.2	NA	1499.6	
6/29/22	320	<5	9.9	13.0	160	<10	2200	<5	NA	2702.9	
6/29/2022 (DUP-1)	320	<5	9.8	13.0	170	<10	2000	<5	NA	2512.8	
MW-17	Jan. 96		ND	30				150	73	NA	253
	Jul. 96	1500	37	34				130	ND	NA	1701
	Jan. 97		25	31				130	86	NA	272
	Jul. 97	360	27	31		170		130	77	NA	795
	Jan. 98	210	13	22		72		120	54	NA	491
	Jul. 98		34	36	<25		<25	150	90	NA	310
	Jan. 99		24	30	<25		<25	190	72	NA	316
	Jul. 99		22	24	52		<50	200	56	NA	354
	Jan. 00	410	16	17	25	138	<25	200	36	NA	842
	Jul. 00	370	25	23	<50	160	<50	270	51	NA	899
	Jan. 01	280	17	19	<50	140	<50	280	39	NA	775
	Jul. 01	190	<10	<10	<50	77	<50	210	<20	NA	477
	Jan. 02	270	5.6	7.4	<25	88	<25	160	<20	NA	531
	Jul. 02	120	<10	<10	<50	<50	<50	160	<20	NA	280
	Jan. 03	140	7	10	<20	<20	<20	230	18	NA	405
	Jul. 03	56	3.9	4.8	<20	31	<20	240	7.2	NA	342.9
	Jan. 04	52	2.7	3.7	<20	29	<20	190	6.5	NA	283.9
	Jul. 04	<250	<10	<10	<100	<100	<100	360	<20	NA	360
	Jan. 05	<250	<10	11	<100	<100	<100	390	<20	NA	401
	Jul. 06	<50	<5	6.4	<50	<50	<50	340	<10	NA	346.4
Jan. 07	150	8.2	16	<20	72	<20	540D	15.1	NA	801.3	
Jul. 07	230	11	18	<50	95	<50	600	24.5	NA	978.5	

Table B4. Groundwater Analytical Summary (VOCs)

**Manor Timber Company
Manor, Clinch County, GA
Permit Number: HW-047(D)**

Well Number	Sample Date	Acetone	Benzene	Ethyl- benzne	2- Hexanone	Methyl Ethyl Ketone*	4-Methyl 2- Pentanone	Toluene	Xylenes (Total)	Styrene**	TOTAL
MW-17	Jan. 08	120	9.2	20	<10	NR	<10	640D	24.5	NA	813.7
	Jul. 08	180	7	12	<50	74	<10	810	15.1	NA	1098.1
	Jan. 09	<250	10.8	23.3		<100		660	<20	NA	694.1
	Jul. 09	<50	4.9	11	7.3	41	<10	370	14	NA	448.2
	1/8/10	<500	<20	<20	<200	<200	<200	576	<60	NA	576
	7/7/10	<125	5.15	11.9	<50	<50	<50	482	5.05	NA	504.1
	1/17/11	<125	<5	11	<50	<50	<50	496	<15	NA	507
	7/10/12	<125	6.15	11.2	<50	<50	<50	512	<15	NA	529.35
	8/8/14	130	7.2	16	12	53	4	670	24	NA	916.2
	10/26/17	140	7.5	18.0	<100	<100	<100	640	15	NA	820.5
	5/25/19	81.7	4.8	12.6	23.8	25.4	<5	419	20.6	NA	587.9
6/29/22	140	31.0	30.0	<10	<50	<10	120	70.0	7.2	398.2	
10/18/22	NA	NA	NA	NA	NA	NA	NA	NA	5.8	5.8	
MW-18	Jan. 97		<10	5.5				60	1.7	NA	67.2
	Jul. 97	<50	<5	6.3		<25		94	<5	NA	100.3
	Jan. 98	<50	<5	5.2		25		100	<5	NA	130.2
	Jul. 98		<5	9.9	<25		<25	130	7	NA	146.9
	Jan. 99		<5	10	<25		<25	92	5	NA	107
	Jul. 99		<5	9.4	<25		<25	140	<10	NA	149.4
	Jan. 00	<5	<5	14	<25	<5	<25	200	<10	NA	214
	Jul. 00	<50	<10	19	<50	<50	<50	280	<20	NA	299
	Jan. 01	<25	<5	16	<25	<25	<25	84	<10	NA	100
	Jul. 01	<50	<10	16	<50	<50	<50	200	<20	NA	216
	Jan. 02	<50	<10	26	<50	<25	<50	280	<20	NA	306
	Jul. 02	<120	<25	31	<120	<120	<120	870	<50	NA	901
	Jan. 03	125	<5	36	<20	74	<20	580	6.4	NA	821.4
	Jul. 03	<120	<5	32	<50	<50	<50	350	<10	NA	382
	Jan. 04	<120	<5	24	<50	64	<50	190	<10	NA	278
	Jul. 04	<500	<20	31	<200	<200	<206	550	<40	NA	581
	Jan. 05	<50	2.1	27	<20	29	<20	170	<4	NA	228.1
	Jul. 06	35	2.9	34	<10	25	<10	180D	6.6	NA	283.5
	Jan. 07	<25	2.6	26	<10	<10	<10	110	3.8	NA	142.4
	Jul. 07	<50	5.5	50	<20	24	<20	660	10	NA	749.5
	Jan. 08	44	2.9	34	<10	NR	<10	200D	7.1	NA	288
	Jul. 08	<25	3.6	38	<10	<10	<10	320D	8.3	NA	369.9
	Jan. 09	47.7	2.23	22.2		58		134	4.61	NA	268.74
	Jul. 09	BRL	2.35	27.7		BRL		65.6	5.43	NA	101.08
	1/18/10	88.4	<2	16.1	<20	68	<20	165	<6	NA	337.5
	7/7/10	<125	<5	18	<50	<50	<50	110	<15	NA	128
	1/17/11	<50	2.42	29.9	<20	94.6	<20	406	<6	NA	532.92
	2/12/12	72.7	1.97	24.5	<10	75.5	<10	404	5.41	NA	584.08
	7/10/12	<50	<2	11.3	<20	<20	<20	85.2	<3	NA	96.5
	2/18/13	107	3.09	29	<10	93.6	<10	505	5.83	NA	743.52
	8/21/13	<250	<10	31.1	<100	126	<50	875	<30	NA	1032.1
	2/24/14	<50	2.26	23.4	<20	43.7	<20	343	4.36	NA	416.72
8/8/14	50.6	2.06	23.8	<20	37.1	<10	244	<6	NA	357.56	
2/9/15	<250	<10	29.9	<100	<100	<50	457	<30	NA	486.9	
8/11/15	46.7	3.24	30.6	<10	59.9	<5	418	5.67	NA	564.11	
2/12/16	<250	<10	24.4	<100	<100	<50	335	<30	NA	359.4	
10/26/17	29.0	2.8	20.0	<10	13.0	<10	160	4.2	NA	229.0	
10/26/2017 (DUP-1)	30.0	2.8	20.0	<10	14.0	<10	190	4.4	NA	261.2	
5/25/19	33.1	2.5	19.6	<5	14.0	<5	236	4.2	NA	309.4	
6/29/22	<50	<5	13.0	<10	<50	<10	79.0	<5	NA	92.0	

**Table B4. Groundwater Analytical Summary (VOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)**

Well Number	Sample Date	Acetone	Benzene	Ethyl- benzne	2- Hexanone	Methyl Ethyl Ketone*	4-Methyl 2- Pentanone	Toluene	Xylenes (Total)	Styrene**	TOTAL
MW-19	7/6/10	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	2/12/12	<25	<1	<1	<10	<10	<10	<2	<3	NA	ND
	7/12/12	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
	2/18/13	<25	<1	<1	<10	<10	<10	<2	<3	NA	ND
	8/21/13	<25	<1	<1	<10	<10	<10	<2	<3	NA	ND
	2/24/14	<25	<1	<1	<10	<10	<10	<2	<3	NA	ND
	8/8/14	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/9/15	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	8/11/15	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	2/12/16	<25	<1	<1	<10	<10	<5	<1	<3	NA	ND
	10/23/17	<25	<1	<1	<10	<10	<10	<1	<3	NA	ND
5/25/19	<25	<1	<1	<5	<5	<5	<1	<2	NA	ND	
6/28/22	<50	<5	<5	<10	<50	<10	<5	<5	NA	ND	

NOTES:

All constituents levels are shown in parts per billion (µg/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

BRL - Below reporting limits

All data prior to 2016 was collected by previous consultants. Envirorisk cannot guarantee the validity of the data.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of VOCs. Vinyl chloride was analyzed for but not detected.

* Methyl-ethyl ketone is also referred to as 2-Butanone in laboratory reports.

** Styrene was added to the Permit in October 2022.

MW-17 was the only well sampled on 10-18-2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-3													
Screened Interval	32-37'													
Sample Date	Jan. 96	Jul. 96	Jan. 97	Jul. 97	Jan. 98	Jul. 98	Jan. 99	Jul. 99	Jan. 00	Jul. 00	Jan. 01	Jul. 01	Jan. 02	Jul. 02
Test Method	8270D													
Acenaphthene	ND	ND	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
Acenaphthylene	ND	ND	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	ND	ND	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
Carbazole	ND	ND	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
2-Chlorophenol	ND	ND	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran		ND	<20	NR	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
2,4-Dimethylphenol	ND	ND	<100	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
Fluoranthene	ND	ND	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
Fluorene	ND	ND	<20	NR	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylnaphthalene	ND	ND	<20	NR	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylphenol (o-cresol)		ND	<20	NR	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)			<100	<10	<10	NR	<10	<10	<10	<10	<10	<10	<10	<10
4-Methylphenol														
Naphthalene	140	110	210	140	120	120	81	98	83	52	68	56	33	38
Pentachlorophenol	ND	ND	<100	<50	<50	<100	<50	<50	<50	<50	<50	<50	<50	<50
Phenanthrene	ND	ND	<20	<50	<50	<20	<10	<10	<10	<10	<10	<10	<10	<10
Phenol	ND	ND	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	ND	ND	<100	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10
2,4,6-Trichlorophenol														
Total SVOCs	140	110	210	140	120	120	81	98	83	52	68	56	33	38

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

NR = Not Reported

All data prior to 2017 was collected by previous consultants. EnviroRisk cannot guarantee the validity of the data.

When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-3													
Screened Interval	32-37'													
Sample Date	Jan. 03	Jul. 03	Jan. 04	Jul. 04	Jan. 05	Jul. 06	Jan. 07	Jul. 07	Jan. 08	Jul. 08	Jan. 09	7/23/09	7/7/10	1/17/11
Test Method	8270D													
Acenaphthene	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
Acenaphthylene	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
Carbazole	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
2-Chlorophenol	<10	<10	<10	<10	<10	<10	<10	<9.7	<10	<9.8	<10	<10	<10	<10
Dibenzofuran	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
2,4-Dimethylphenol	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
Fluoranthene	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
Fluorene	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
2-Methylnaphthalene	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
4-Methylphenol											<10	<10	<10	<10
Naphthalene	37	30	22	16	33	<10	16	15	15	<9.8	11	<10	<10	<10
Pentachlorophenol	<50	<50	<50	<50	<50	<10	<9.4	<9.7	<48	<49	<50	<50	<50	<50
Phenanthrene	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
Phenol	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<10	<10	<10	<10	<10	<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
2,4,6-Trichlorophenol							<9.4	<9.7	<9.4	<9.8	<10	<10	<10	<10
Total SVOCs	37	30	22	16	33	ND	16	15	15	ND	11	ND	ND	ND

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

NR = Not Reported

All data prior to 2017 was collected by previous consultants. EnviroRisk cannot guarantee the validity of the data.

When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-3					MW-3B							
Screened Interval	32-37'					57-67'							
Sample Date	7/10/12	8/7/14	10/25/17	5/25/19	6/28/22	7/23/09	1/8/10	7/6/10	7/10/12	8/7/14	10/25/17	5/25/19	6/28/22
Test Method	8270D					8270D							
Acenaphthene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acenaphthylene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Carbazole	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Chlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,4-Dimethylphenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluoranthene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluorene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylnaphthalene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
4-Methylphenol	<10	<10			<10	<10	<10	<10	<10	<10			<10
Naphthalene	<10	<10	<10	<10	<10	10.8	12.2	<10	<10	<10	<10	<10	<10
Pentachlorophenol	<50	<50	<50	<20	<25	<50	<50	<50	<50	<50	<50	<20	<25
Phenanthrene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Phenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<20	<10
2,4,6-Trichlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Total SVOCs	ND	ND	ND	ND	ND	10.8	12.2	ND	ND	ND	ND	ND	ND

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

NR = Not Reported

All data prior to 2017 was collected by previous consultants. EnviroRisk cannot guarantee the validity of the data.

When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-4B													
Screened Interval	20-30'													
Sample Date	Jan. 96	Jul. 96	Jan. 97	Jul. 97	Jan. 98	Jul. 98	Jan. 99	Jul. 99	Jan. 00	Jul. 00	Jan. 01	Jul. 01	Jan. 02	Jul. 02
Test Method	8270D													
Acenaphthene	280	200	200	260	170	200	97	95	<50	60	52	62	59	50
Acenaphthylene	ND	ND	<100	<200	<10	<200	<10	<40	<50	<10	<50	<50	<50	<40
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	ND	ND	<20	<200	<10	<200	63	54	<10	<10	<50	<50	<50	<40
Carbazole	240	310	190	200	120	<200	80	96	51	57	<50	<50	<50	<40
2-Chlorophenol	ND	ND	<100	<200	<10	<10	<10	<40	<50	<10	<50	<50	<50	<40
Dibenzofuran		ND	NR	<200	100	<200	69	67	<50	48	<50	<50	<50	<40
2,4-Dimethylphenol	ND	ND	<500	<200	<10	<200	11	<40	<50	30	<50	<50	<50	<40
Fluoranthene	ND	ND	<20	<200	<10	<200	<10	<40	<50	<10	<50	<50	<50	<40
Fluorene	ND	ND	NR	NR	97	<200	60	52	<50	38	<50	<50	<50	<40
2-Methylnaphthalene	ND	ND	NR	NR	230	240	120	130	54	82	63	68	65	51
2-Methylphenol (o-cresol)		ND	NR	NR	<10	<200	<10	<40	<50	<10	<50	<50	<50	<40
3,4-Methylphenol (m+p-cresol)					<10	NR	NR	<40	<50	<10	<50	<50	<50	<40
4-Methylphenol														
Naphthalene	2500	2000	1500	2800	2400	1600	<10	1400	470	660	480	510	350	330
Pentachlorophenol	ND	ND	<500	<1000	60	<1000	57	<200	<250	<10	<250	<250	<250	<200
Phenanthrene	ND	ND	<20	<200	<10	<200	63	54	<10	39	<50	<50	<50	<40
Phenol	ND	ND	<100	<200	<10	<10	<10	<40	<50	<10	<50	<50	<50	<50
2,3,4,6-Tetrachlorophenol	ND	ND	<500	<1000	60	<200	45	<40	<50	12	<50	<50	<50	<40
2,4,6-Trichlorophenol														
Total SVOCs	3,020	2,510	1,890	3,260	3,237	2,040	665	1,948	575	1,026	595	640	474	431

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

NR = Not Reported

All data prior to 2017 was collected by previous consultants. Envirorisk cannot guarantee the validity of the data.

When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

	MW-4B															
	20-30'															
Sample Date	Jan. 03	Jul. 03	Jan. 04	Jul. 04	Jan. 05	Jul. 06	Jan. 07	Jul. 07	Jan. 08	Jul. 08	Jan. 09	7/23/09	1/8/10	7/7/10	1/17/11	2/12/12
	8270D															
Acenaphthene	<100	<200	100	<100	110	55	47	77	70	69	58.1	97	95.2	119.0	18	115
Acenaphthylene	<100	<200	<50	<100	<50	<10	<9.4	<9.7	<48	<19	<10	<20	<10	<20	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<100	<200	<50	<100	<50	<10	<9.4	<9.7	<48	<19	<10	<20	10.9	<20	<10	14.4
Carbazole	<100	<200	<50	<100	<50	22	38	29	<48	<19	15.1	<20	15.5	<20	<10	19.5
2-Chlorophenol	<100	<200	<50	<100	<50	<10	<9.4	<9.7	<48	<19	<10	<20	<10	<20	<10	<10
Dibenzofuran	<100	<200	62	<100	70	29	28	48	<48	38	35.5	63	56.4	78.1	<10	74.8
2,4-Dimethylphenol	<100	<200	<50	<100	<50	75	160	100	<48	54	37.6	<20	48.1	<20	79	<10
Fluoranthene	<100	<200	<50	<100	<50	20.0	<9.4	<9.7	<48	<19	<10	<20	<10	<20	<10	<10
Fluorene	<100	<200	64	<100	74	34	30	48	<48	44	37.9	65	65.7	81.2	26	73.6
2-Methylnaphthalene	<100	<200	98	<100	100	34	50	81	<48	54	39.0	88	50.7	97.8	347	104
2-Methylphenol (o-cresol)	<100	<200	<50	<100	<50	57	150	71	<48	32	33.4	<20	25.0	<20	107	<10
3,4-Methylphenol (m+p-cresol)	<100	<200	<50	<100	<50	92	170	96	<48	58	<10	<20	<10	<20	<10	<10
4-Methylphenol											53.7	<20	36.4	<20	321	<10
Naphthalene	580	1000	530	500	480	69	390	440D	420	260	37.1	270	49.4	269.0	316	265
Pentachlorophenol	<500	<1000	<250	<500	<250	<50	<47	<49	<240	<94	<50	<100	<50	<100	<50	<50
Phenanthrene	<100	<200	50	<100	67	40	35	45	<48	42	37.6	66	68.0	82.1	<10	78
Phenol	<100	<200	<50	<100	<50	59	110	60	88	34	14.1	<20	<10	<20	84	<10
2,3,4,6-Tetrachlorophenol	<100	<200	<50	<100	<50	<10	14	<9.7	<48	<19	<10	<20	<10	<20	<10	<10
2,4,6-Trichlorophenol							<9.4	<9.7	<48	<19	<10	<20	<10	<20	<10	<10
Total SVOCs	580	1,000	904	500	901	586	1,222	1,095	578	685	399.1	650	521.3	727	1,299	744.3

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

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Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Sample Date	MW-4B											MW-5			
	20-30'											10-15'			
	7/10/12	2/18/13	8/21/13	2/24/14	8/8/14	2/9/15	8/11/15	2/12/16	10/26/17	5/25/19	6/29/22	1/18/10	7/10/12	8/7/14	10/25/17
	8270D											8270D			
Acenaphthene	122	93.7	103.0	102.0	112	144	99	142	66.0	91.4	94.0	<10	<10	<10	<10
Acenaphthylene	<20	<10	<10	<10	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<20	12.6	15.2	15.6	<20	17.1	17	<20	<10	<10	<10	<10	<10	<10	<10
Carbazole	<20	10.3	<10	19.1	<20	20.3	13	<20	<10	11.1	17.0	<10	<10	<10	<10
2-Chlorophenol	<20	<10	<10	<10	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran	75.8	54.8	57.9	51.8	74	86.1	65	92	43.0	20.0	60.0	<10	<10	<10	<10
2,4-Dimethylphenol	<20	28.4	<10	153.0	<20	<10	13.5	<20	<10	<10	<10	<10	<10	<10	<10
Fluoranthene	<20	10.6	10.2	10.3	<20	<10	10.4	<20	<10	<10	<10	<10	<10	<10	<10
Fluorene	81.2	68.7	71.4	69.2	75	103	75.5	102	48.0	43.1	62.0	<10	<10	<10	<10
2-Methylnaphthalene	88	70.3	82.8	63.0	101	85.6	93.9	129	47.0	14.5	74.0	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<20	17.5	<10	33.4	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<20	<10	<10	<10	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10
4-Methylphenol	<20	17.5	<10	64.5	<20	22.6	17.7	<20			<10	<10	<10	<10	
Naphthalene	199	173.0	187.0	61.3	261	80.8	194.0	280	160	40.9	250	<10	<10	<10	<10
Pentachlorophenol	<100	57.7	82.7	<50	<100	87.3	70.1	<100	<50	60.8	<25	<50	<50	<50	<50
Phenanthrene	108	82.3	<10	72.8	69	88.5	91.1	96.4	57.0	29.6	60.0	<10	<10	<10	<10
Phenol	<20	11.8	<10	<10	<20	14	<10	<20	<10	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<20	<10	<10	<10	<20	<10	<10	<10	<10	<20	<10	<10	<10	<10	<10
2,4,6-Trichlorophenol	<20	<10	<10	<10	<20	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10
Total SVOCs	674	709.2	610.2	716.0	692.6	749	760.7	841	421	311.4	617.0	ND	ND	ND	ND

NOTES:

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Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-5		MW-6											
Screened Interval	10-15'		5-15'											
Sample Date	5/24/19	6/28/22	Jan. 00	Jul. 00	Jan. 01	Jul. 01	Jan. 02	Jul. 02	Jan. 03	Jul. 03	Jan. 04	Jul. 04	Jan. 05	Jul. 06
Test Method	8270D		8270D											
Acenaphthene	<10	<10	18	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acenaphthylene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Carbazole	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Chlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,4-Dimethylphenol	<10	<10	13	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluoranthene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluorene	<10	<10	27	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylnaphthalene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
4-Methylphenol		<10												
Naphthalene	<10	<10	45	<10	<10	<10	18	<10	<10	<10	<10	<10	<10	<10
Pentachlorophenol	<20	<25	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Phenanthrene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Phenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<20	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,4,6-Trichlorophenol	<10	<10												
Total SVOCs	ND	ND	103	ND	ND	ND	18	ND	ND	ND	ND	ND	ND	ND

NOTES:

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Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-6												MW-7	
Screened Interval	5-15'												9-14'	
Sample Date	Jan. 07	Jul. 07	Jan. 08	Jul. 08	7/23/09	1/18/10	1/17/11	7/10/12	8/7/14	10/25/17	5/25/19	6/28/22	7/24/09	7/6/10
Test Method	8270D												8270D	
Acenaphthene	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acenaphthylene	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Carbazole	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Chlorophenol	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,4-Dimethylphenol	<47	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluoranthene	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluorene	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylnaphthalene	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
4-Methylphenol					<10	<10	<10	<10	<10			<10	<10	<10
Naphthalene	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Pentachlorophenol	<47	<47	<48	<47	<50	<50	<50	<50	<50	<50	<20	<25	<50	<50
Phenanthrene	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Phenol	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<20	<10	<10	<10
2,4,6-Trichlorophenol	<9.4	<9.4	<9.5	<9.4	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Total SVOCs	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

NOTES:

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Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-7					MW-8						
	9-14'					12-22'						
Sample Date	7/10/12	8/8/14	10/23/17	5/24/19	6/28/22	7/23/09	7/6/10	7/10/12	8/7/14	10/25/17	5/23/19	6/28/22
Test Method	8270D					8270D						
Acenaphthene	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acenaphthylene	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Carbazole	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Chlorophenol	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,4-Dimethylphenol	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluoranthene	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluorene	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylnaphthalene	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
4-Methylphenol	<40	<19			<10	<10	<10	<10	<10			<10
Naphthalene	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Pentachlorophenol	<200	<95	<50	<20	<25	<50	<50	<50	<50	<50	<20	<25
Phenanthrene	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Phenol	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<40	<19	<10	<20	<10	<10	<10	<10	<10	<10	<20	<10
2,4,6-Trichlorophenol	<40	<19	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Total SVOCs	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

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Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-9													
Screened Interval	8-13'													
Sample Date	7/23/09	7/7/10	2/12/12	7/10/12	2/18/13	8/21/13	2/24/14	8/8/14	2/9/15	8/11/15	2/12/16	10/25/17	5/24/19	6/28/22
Test Method	8270D													
Acenaphthene	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Acenaphthylene	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Carbazole	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
2-Chlorophenol	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
2,4-Dimethylphenol	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Fluoranthene	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Fluorene	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
2-Methylnaphthalene	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
4-Methylphenol	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10		<10		<10
Naphthalene	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Pentachlorophenol	<50	<50	<500	<200	<250	<50	<250	<50	<50	<50	<50	<50	<20	<25
Phenanthrene	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Phenol	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<20	<10
2,4,6-Trichlorophenol	<10	<10	<100	<40	<50	<10	<50	<10	<10	<10	<10	<10	<10	<10
Total SVOCs	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

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Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-10							MW-11							
Screened Interval	10-15'							9-14'							
Sample Date	7/23/09	7/7/10	7/10/12	8/7/14	10/25/17	5/24/19	6/28/22	Jan. 96	Jul. 96	Jan. 97	Jul. 97	Jan. 98	Jul. 98	Jan. 99	Jul. 99
Test Method	8270D							8270D							
Acenaphthene	<10	<10	<10	<10	<10	<10	<10	54	65	66	37	46	56	36	72
Acenaphthylene	<10	<10	<10	<10	<10	<10	<10	ND	ND	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<10	<10	<10	<10	<10	ND	ND	<10	<10	70	<10	<10	<10
Carbazole	<10	<10	<10	<10	<10	<10	<10	30	50	62	31	31	37	14	56
2-Chlorophenol	<10	<10	<10	<10	<10	<10	<10	ND	ND	<10	<10	<10	<10	<10	<10
Dibenzofuran	<10	<10	<10	<10	<10	<10	<10		ND	NR	NR	27	34	<10	44
2,4-Dimethylphenol	<10	<10	<10	<10	<10	<10	<10	13	ND	<10	<10	<10	<10	16	14
Fluoranthene	<10	<10	<10	<10	<10	<10	<10	ND	ND	<10	<10	<10	<10	<10	<10
Fluorene	<10	<10	<10	<10	<10	<10	<10	ND	ND	NR	NR	72	100	40	100
2-Methylnaphthalene	<10	<10	<10	<10	<10	<10	<10	ND	ND	NR	NR	40	13	<10	71
2-Methylphenol (o-cresol)	<10	<10	<10	<10	<10	<10	<10		ND	NR	NR	<10	<10	21	<10
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<10	<10	<10	<10					<10	NR	NR	<10
4-Methylphenol	<10	<10	<10	<10			<10								
Naphthalene	<10	<10	<10	<10	<10	<10	<10	150	200	140	38	110	<10	<10	210
Pentachlorophenol	<50	<50	<50	<50	<50	<20	<25	ND	ND	<50	<50	<50	<50	<50	<50
Phenanthrene	<10	<10	<10	<10	<10	<10	<10	ND	ND	<10	<10	<10	<10	<10	<10
Phenol	<10	<10	<10	<10	<10	<10	<10	ND	ND	<10	<10	<50	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<10	<10	<10	<10	<20	<10	ND	ND	<50	<50	<10	<10	<10	<10
2,4,6-Trichlorophenol	<10	<10	<10	<10	<10	<10	<10								
Total SVOCs	ND	ND	ND	ND	ND	ND	ND	247	315	268	106	396	240	127	567

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

NR = Not Reported

All data prior to 2017 was collected by previous consultants. Envirorisk cannot guarantee the validity of the data.

When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-11													
Screened Interval	9-14'													
Sample Date	Jan. 00	Jul. 00	Jan. 01	Jul. 01	Jan. 02	Jul. 02	Jan. 03	Jul. 03	Jan. 04	Jul. 04	Jan. 05	Jul. 06	Jan. 07	Jul. 07
Test Method	8270D													
Acenaphthene	78	<10	<10	<10	12	43	<10	34	18	<10	<10	37	57	30
Acenaphthylene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	11	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
Carbazole	62	<10	<10	<10	<10	27	<10	22	10	<10	<10	22	41	18
2-Chlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
Dibenzofuran	54	<10	<10	<10	<10	23	<10	18	11	<10	<10	20	32	17
2,4-Dimethylphenol	14	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
Fluoranthene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
Fluorene	100	<10	<10	<10	14	62	<10	50	32	<10	10	50	84	42
2-Methylnaphthalene	70	<10	<10	<10	<10	35	<10	33	12	<10	<2	31	52	26
2-Methylphenol (o-cresol)	12	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
4-Methylphenol														
Naphthalene	220	<10	<10	<10	24	110	<10	120	14	<10	<10	81	160	95
Pentachlorophenol	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<48	<49
Phenanthrene	11	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
Phenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
2,3,4,6-Tetrachlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<9.6	<9.7
2,4,6-Trichlorophenol													<9.6	<9.7
Total SVOCs	632	ND	ND	ND	50	300	ND	277	97	ND	10	241	426	228

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

NR = Not Reported

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-11													
Screened Interval	9-14'													
Sample Date	Jan. 08	Jul. 08	Jan. 09	7/23/09	1/18/10	7/7/10	1/17/11	2/12/12	7/10/12	2/18/13	8/21/13	2/24/14	8/8/14	2/9/15
Test Method	8270D													
Acenaphthene	<9.6	11	<10	<10	39.6	<10	33	<10	<40	28	<10	<10	<10	<10
Acenaphthylene	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
Carbazole	<9.6	<9.4	<10	<10	24.2	<10	22	<10	<40	15	<10	<10	<10	<10
2-Chlorophenol	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
Dibenzofuran	<9.6	<9.4	<10	<10	21.5	<10	15	<10	<40	12	<10	<10	<10	<10
2,4-Dimethylphenol	<9.6	<9.4	<50	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
Fluoranthene	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
Fluorene	<9.6	20	<10	<10	56.5	<10	34	<10	<40	46	<10	<10	<10	21
2-Methylnaphthalene	<9.6	<9.4	<10	<10	35.2	<10	26	<10	<40	26.6	<10	<10	<10	10.80
2-Methylphenol (o-cresol)	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
4-Methylphenol			<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
Naphthalene	<9.6	29	<10	<10	105.0	<10	73	<10	<40	104	<10	<10	<10	18.40
Pentachlorophenol	<48	<47	<50	<50	<50	<50	<50	<50	<200	<50	<50	<50	<50	<50
Phenanthrene	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
Phenol	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
2,4,6-Trichlorophenol	<9.6	<9.4	<10	<10	<10	<10	<10	<10	<40	<10	<10	<10	<10	<10
Total SVOCs	ND	60	ND	ND	282.0	ND	202.2	ND	ND	231.6	ND	ND	ND	50.2

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

NR = Not Reported

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-11					MW-12				MW-13				MW-14	
Screened Interval	9-14'					9-14'				9-14'				10-15'	
Sample Date	8/11/15	2/12/16	10/25/17	5/24/19	6/29/22	7/23/09	7/6/10	10/23/17	5/23/19	7/23/09	7/7/10	10/23/17	5/24/19	7/23/09	7/6/10
Test Method	8270D					8270D				8270D				8270D	
Acenaphthene	19	<10	<10	20.4	21.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acenaphthylene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Carbazole	17	<10	<10	12.4	14.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Chlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran	<10	<10	<10	<10	10.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,4-Dimethylphenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluoranthene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Fluorene	31.4	17.6	<10	26.2	29.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylnaphthalene	18	<10	<10	11.4	14.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
4-Methylphenol	<10	<10			<10	<10	<10			<10	<10			<10	<10
Naphthalene	71.4	18.4	<10	43.5	49.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Pentachlorophenol	<50	<50	<50	<20	<25	<50	<50	<50	<20	<50	<50	<50	<20	<50	<50
Phenanthrene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Phenol	<10	<10	<10	<10	<10	<10	<10	<10	<10 M1	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<10	<10	<20	<10	<10	<10	<10	<20	<10	<10	<10	<20	<10	<10
2,4,6-Trichlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Total SVOCs	156.8	36.0	ND	113.9	137.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

M1 = Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

NR = Not Reported

All data prior to 2017 was collected by previous consultants. Envirorisk cannot guarantee the validity of the data.

When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-14		MW-15												
Screened Interval	10-15'		7-9'												
Sample Date	10/24/17	5/24/19	Jan. 96	Jul. 96	Jan. 97	Jul. 97	Jan. 98	Jul. 98	Jan. 99	Jul. 99	Jan. 00	Jul. 00	Jan. 01	Jul. 01	Jan. 02
Test Method	8270D		8270D												
Acenaphthene	<10	<10	ND	58	18	72	31	34	66	18	31	<10	<10	46	60
Acenaphthylene	<10	<10	ND	ND	<10	<50	<10	<10	<10	<10	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	ND	ND	<10	<50	<10	<10	<10	<10	<10	<10	<10	<10	<10
Carbazole	<10	<10	ND	59	<10	NR	15	17	50	10	11	<10	<10	<10	18
2-Chlorophenol	<10	<10	ND	ND	<10	<50	<10	<10	<10	<10	<10	<10	<10	<10	<10
Dibenzofuran	<10	<10		ND	NR	<50	10	11	38	<10	<10	<10	<10	14	15
2,4-Dimethylphenol	<10	<10	23	99	58	130	44	28	<10	13	70	<10	<10	12	27
Fluoranthene	<10	<10	ND	ND	<10	<50	<50	<10	<50	<10	<10	<10	<10	<10	<10
Fluorene	<10	<10	ND	ND	NR	200	61	72	100	21	30	<10	<10	60	52
2-Methylnaphthalene	<10	<10	ND	ND	NR	<50	13	11	57	<10	<10	<10	<10	17	14
2-Methylphenol (o-cresol)	<10	<10		ND	NR	90	24	30	<10	<10	34	<10	<10	<10	14
3,4-Methylphenol (m+p-cresol)	<10	<10					<10	NR	NR	<10	<10	<10	<10	<10	<10
4-Methylphenol															
Naphthalene	<10	<10	ND	170	<10	290	68	45	140	41	25	<10	<10	94	74
Pentachlorophenol	<50	<20	ND	ND	<50	<250	<50	<50	<50	<50	<50	<50	<50	<50	<50
Phenanthrene	<10	<10	ND	ND	<10	<50	<10	<10	<10	<10	<10	<10	<10	<10	<10
Phenol	<10	<10	35	ND	16	<50	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<20	ND	ND	<50	<50	<50	<10	<10	<10	<10	<10	<10	<10	<10
2,4,6-Trichlorophenol	<10	<10													
Total SVOCs	ND	ND	58	386	92	782	266	248	451	103	201	ND	ND	243	274

NOTES:

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Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-15														
Screened Interval	7-9'														
Sample Date	Jul. 02	Jan. 03	Jul. 03	Jan. 04	Jul. 04	Jul. 04	Jan. 05	Jul. 06	Jan. 07	Jul. 07	Jan. 08	Jul. 08	Jan. 09	7/23/09	1/18/10
Test Method	8270D														
Acenaphthene	49	<10	56	32	30	30	16	79	13	36	<9.4	79	11.4	55.6	<10
Acenaphthylene	<10	<10	<10	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	<9.4	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<10	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	<9.4	<10	<10	<10
Carbazole	20	<10	<10	<10	<10	<10	<10	19	<9.4	NR	<9.4	18	<10	12.2	<10
2-Chlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	<9.4	<10	<10	<10
Dibenzofuran	12	<10	11	<10	<10	<10	<10	11	<9.4	<9.4	<9.4	13	<10	<10	<10
2,4-Dimethylphenol	17	<10	20	17	<10	<10	<10	<10	<9.4	<9.4	<9.4	14	<50	<10	<50
Fluoranthene	<10	<10	<10	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	<9.4	<10	<10	<10
Fluorene	48	<10	51	28	33	33	11	51	10	31	<9.4	59	<10	36	<10
2-Methylnaphthalene	15	<10	13	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	12	<10	10.8	<10
2-Methylphenol (o-cresol)	<10	<10	<10	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	<9.4	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<10	<10	<10	<10		<9.4	<9.4	<9.4	<9.4	<10	<10	<10
4-Methylphenol													<10	<10	<10
Naphthalene	100	<10	70	32	<10	<10	24	<10	27	38	<9.4	83	<10	63.6	<10
Pentachlorophenol	<50	<50	<50	<50	<50	<50	<50	<50	<47	<9.4	<47	<47	<50	<50	<50
Phenanthrene	<10	<10	<10	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	<9.4	<10	<10	<10
Phenol	<10	<10	<10	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	<9.4	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<9.4	<9.4	<9.4	<9.4	<10	<10	<10
2,4,6-Trichlorophenol									<9.4	<9.4	<9.4	<9.4	<10	<10	<10
Total SVOCs	261	ND	221	109	63	63	51	160	50	105	ND	278	11.4	178.2	ND

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NR = Not Reported

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-15							MW-16							
Screened Interval	7-9'							9-14'							
Sample Date	7/7/10	1/17/11	7/10/12	8/8/14	10/25/17	5/25/19	6/29/22	Jan. 96	Jul. 96	Jan. 97	Jul. 97	Jan. 98	Jul. 98	Jan. 99	Jul .99
Test Method	8270D							8270D							
Acenaphthene	<10	<10	29.5	32.3	10.0	39.0	18.0	ND	ND	<200	<200	<200	<100	<40	<50
Acenaphthylene	<10	<10	<10	<20	<10	<10	<10	ND	ND	<200	<200	<200	<100	<40	<50
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<10	<20	<10	<10	<10	ND	ND	<200	<200	<200	<100	<40	<50
Carbazole	<10	<10	<10	<20	<10		<10	ND	ND	<200	<200	<200	<100	<40	<50
2-Chlorophenol	<10	<10	<10	<20	<10	<10	<10	ND	ND	<200	<200	<200	<100	<40	<50
Dibenzofuran	<10	<10	<10	<20	<10	<10	<10		ND	NR	NR	<200	<100	<40	<50
2,4-Dimethylphenol	<50	<50	<50	<20	<10	<10	<10	ND	220	340	420	290	<100	<40	290
Fluoranthene	<10	<10	<10	<20	<10	<10	<10	ND	ND	<200	<200	<200	<100	<40	<50
Fluorene	<10	<10	18	<20	<10	22.0	11.0	ND	140	NR	NR	<200	<100	<40	80
2-Methylnaphthalene	<10	<10	<10	<20	<10	<10	<10	ND	ND	NR	NR	<200	<100	<40	52
2-Methylphenol (o-cresol)	<10	<10	<10	<20	<10	<10	<10		ND	NR	NR	570	140	<40	340
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<20	<10	<10	<10					2600	NR	65	1500
4-Methylphenol	<10	<10	<10	<20			<10								
Naphthalene	<10	<10	13	<20	<10	31.0	13.0	810	44	760	840	970	220	130	550
Pentachlorophenol	<50	<50	<50	<100	<50	<20	<25	ND	ND	<1000	<1000	<1000	<500	<200	<250
Phenanthrene	<10	<10	<10	<20	<10	<10	<10	ND	ND	<200	<200	<200	<100	<40	<50
Phenol	<10	<10	<10	<20	<10	<10	<10	2000	1500	2200	2600	2100	720	<40	<50
2,3,4,6-Tetrachlorophenol	<10	<10	<10	<20	<10	<20	<10	ND	ND	<1000	<1000	<1000	<100	<40	<50
2,4,6-Trichlorophenol	<10	<10	<10	<20	<10	<10	<10								
Total SVOCs	ND	ND	60.1	32.3	10.0	92.0	42.0	2810	1904	3300	3860	6530	1080	195	2812

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-16													
Screened Interval	9-14'													
Sample Date	Jan. 00	Jul. 00	Jan. 01	Jul. 01	Jan. 02	Jul. 02	Jan. 03	Jul. 03	Jan. 04	Jul. 04	Jan. 05	Jul. 06	Jan. 07	Jul. 07
Test Method	8270D													
Acenaphthene	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	58	33
Acenaphthylene	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	<9.7	<9.8
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	<9.7	<9.8
Carbazole	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	<9.7	<9.8
2-Chlorophenol	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	<9.7	<9.8
Dibenzofuran	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	<9.7	<9.8
2,4-Dimethylphenol	490	78	330	300	630	380	260	530	340	240	360	200	180	170D
Fluoranthene	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	<9.7	<9.8
Fluorene	<100	32	68	<200	<200	<200	<200	<200	100	<100	110	<94	96	74
2-Methylnaphthalene	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	36	36
2-Methylphenol (o-cresol)	2900	88	72	320	<200	400	270	560	340	260	340	200	170D	170D
3,4-Methylphenol (m+p-cresol)	<100	380	1500	1500	2800	1900	1200	2400	1500	<100	1500	810.0	650D	680D
4-Methylphenol														
Naphthalene	610	150	510	520	950	650	480	990	610	460	680	400	360D	340D
Pentachlorophenol	<500	<20	<50	<1000	<1000	<1000	<1000	<1000	<500	<500	<500	<470	<49	<49
Phenanthrene	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	<9.7	<9.8
Phenol	2300	310	1100	1300	2700	1600	900	2400	1100	970	1200	560	<9.7	470D
2,3,4,6-Tetrachlorophenol	<100	<20	<50	<200	<200	<200	<200	<200	<100	<100	<100	<94	<9.7	<9.8
2,4,6-Trichlorophenol													<9.7	<9.8
Total SVOCs	6300	1038	3580	3940	7080	4930	3110	6880	3990	1930	4190	2170	1550	1973

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-16												
Screened Interval	9-14'												
Sample Date	Jan. 08	Jul. 08	Jan. 09	7/23/09	1/18/10	1/17/11	7/10/12	8/8/14	10/26/17	5/25/19	5/25/2019 (DUP-1)	6/29/22	6/29/2022 (DUP-1)
Test Method	8270D												
Acenaphthene	<48	<94	67.6	<50	<20	<10	61	55.2	49.0	61.4	61.0	100	94.0
Acenaphthylene	<48	<94	<50	<50	<20	<10	<10	<50	<10	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<48	<94	<50	<50	<20	<10	<10	<50	<10	<10	<10	<10	<10
Carbazole	<48	<94	<50	<50	<20	<10	<10	<50	<10	<10	<10	34.0	34.0
2-Chlorophenol	<48	<94	<50	<50	<20	<10	<10	<50	<10	<10	<10	<10	<10
Dibenzofuran	<48	<94	<50	<50	<20	<10	4.9	<50	<10	<10	<10	40.0	37.0
2,4-Dimethylphenol	170	270	67.5	106	116	48.3	83	126	80.0	77.7	81.8	<10	<10
Fluoranthene	<48	<94	<50	<50	<20	<10	<10	<50	<10	<10	<10	<10	<10
Fluorene	77	120	<50	64.9	<20	76.4	81	92.5	62.0	72.5	72.2	120	110
2-Methylnaphthalene	<48	<94	77.4	<50	31.2	23.9	27	<50	25.0	24.0	25.3	110	100
2-Methylphenol (o-cresol)	190	280	94.6	119	73.9	62.4	72	<50	73.0	58.0	62.9	100	100
3,4-Methylphenol (m+p-cresol)	760.0	1000	<50	<50	94.2	<10	260.0	<50	350	278	266	540	450
4-Methylphenol			390	432.0	<20	276		412				540	450
Naphthalene	370	560	239	209	275	228	210	337	300	270	272	890	740
Pentachlorophenol	<48	<94	<250	<250	<100	<10	<50	<250	<50	<20	<20	<25	<25
Phenanthrene	<48	<94	<50	<50	<20	<10	<10	<50	<10	<10	<10	<10	<10
Phenol	480	680	141	169	108	72	86	146	34.0	34.3	35.7	<10	150
2,3,4,6-Tetrachlorophenol	<48	<94	<50	<50	<20	<10	<10	<50	<10	<20	<20	<10	<10
2,4,6-Trichlorophenol	<48	<94	<50	<50	<20	<10	<10	<50	<10	<10	<10	<10	<10
Total SVOCs	2047	2910	1077.1	1100	698.3	787.0	737.9	1168.7	973	875.9	876.9	2,474.0	1,815.0

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-17													
Screened Interval	12-17'													
Sample Date	Jan. 96	Jul. 96	Jan. 97	Jul. 97	Jan. 98	Jul. 98	Jan. 99	Jul. 99	Jan. 00	Jul. 00	Jan. 01	Jul. 01	Jan. 02	Jul. 02
Test Method	8270D													
Acenaphthene	540	ND	550	460	<500	<1000	<500	450	240	230	<250	<200	88	120
Acenaphthylene	ND	ND	<500	<400	<500	<1000	<500	<200	<100	<200	<250	<200	<50	<100
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	ND	ND	<500	<400	<500	<1000	<500	<200	<100	<200	<250	<200	<50	<100
Carbazole	530	ND	<500	<400	<500	<1000	<500	370	220	<200	<250	<200	<68	<100
2-Chlorophenol	ND	ND	<500	<400	<500	<1000	<500	1400	<100	<200	<250	<200	<200	<100
Dibenzofuran		ND	NR	NR	<500	<1000	<500	270	140	<200	<250	<200	54	<100
2,4-Dimethylphenol	920	790	600	600	570	<1000	<500	900	570	590	570	340	200	230
Fluoranthene	ND	ND	<500	<400	<400	<1000	<500	<200	<100	<200	<250	<200	<50	<100
Fluorene	ND	ND	NR	NR	<500	<1000	<500	290	160	<200	<250	<200	66	<100
2-Methylnaphthalene	ND	ND	NR	NR	590	<1000	<500	680	350	340	390	210	120	150
2-Methylphenol (o-cresol)		ND	NR	NR	<500	<1000	<500	660	1600	410	340	230	140	170
3,4-Methylphenol (m+p-cresol)					890	NR	1600	2000	<100	1200	1000	690	360	500
4-Methylphenol														
Naphthalene	5600	4000	<2500	4800	4400	6400	3600	4500	2200	2900	3300	1900	940	1400
Pentachlorophenol	ND	ND	<2500	<2000	<2500	<5000	<2500	<1000	<500	<1000	<1200	<1000	<250	<500
Phenanthrene	ND	ND	<500	<400	<500	<1000	<500	<200	<100	<200	<250	<200	<50	<100
Phenol	1400	1200	1100	1000	740	1400	1000	1400	850	860	680	530	250	330
2,3,4,6-Tetrachlorophenol	ND	ND	<2500	<2000	<2500	<1000	<500	<200	<100	<200	<250	<200	<50	<100
2,4,6-Trichlorophenol														
Total SVOCs	8990	5990	2250	6860	7190	7800	6200	12920	6330	6530	6280	3900	2218	2900

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-17													
Screened Interval	12-17'													
Sample Date	Jan. 03	Jul. 03	Jan. 04	Jul. 04	Jan. 05	Jul. 06	Jan. 07	Jul. 07	Jan. 08	Jul. 08	Jan. 09	Jul. 09	1/18/10	7/7/10
Test Method	8270D													
Acenaphthene	120	<100	<100	<100	110	82	<190	170	<190	<190	165	68	139	110
Acenaphthylene	<100	<100	<100	<100	<100	<10	<9.4	<9.4	<190	<190	<100	<10	128	<100
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<100	<100	<100	<100	<100	<10	<9.4	<9.4	<190	<190	<100	2.1	<100	<100
Carbazole	<100	<100	<100	<100	<100	62	140	120	<190	<190	<100	<10	<100	<100
2-Chlorophenol	<100	<100	<100	<100	<100	<10	<9.4	<9.4	<190	<190	<100	<10	<100	<100
Dibenzofuran	<100	<100	<100	<100	<100	45	89	84	<190	<190	<100	33	<100	<100
2,4-Dimethylphenol	240	130	190	120	240	180	210D	360D	310	320	160	140	<100	165
Fluoranthene	<100	<100	<100	<100	<100	<10	<9.4	<9.4	<190	<190	<100	<10	<100	<100
Fluorene	<100	<100	<100	<100	<100	79	150	150	<190	<190	138	67	<100	<100
2-Methylnaphthalene	160	<100	130	<100	150	110	<9.4	240D	270	190	204	91	151	<100
2-Methylphenol (o-cresol)	170	<100	120	<100	160	120	<190	210D	220	210	114	76	<100	<100
3,4-Methylphenol (m+p-cresol)	470	260	340	<100	430	310	340D	500D	490	510	<100	170	<100	<100
4-Methylphenol											238		146	196
Naphthalene	1500	700	1000	660	1300	840	1500D	2300D	2200	1500	1660	1000	1090	1250
Pentachlorophenol	<500	<500	<500	<500	<500	<50	<47	<47	<970	<940	<500	<50	<500	152
Phenanthrene	<100	<100	<100	<100	<100	23	43	35	<190	<190	<100	20	<100	<100
Phenol	310	180	220	140	270	180	<190	300D	260	260	<100	38	<100	<100
2,3,4,6-Tetrachlorophenol	<100	<100	<100	<100	<100	<10	<9.4	<9.4	<190	<190	<100	<10	<100	<100
2,4,6-Trichlorophenol							<9.4	<9.4	<190	<190	<100	<10	<100	<100
Total SVOCs	2970	1270	2000	920	2660	2031	2472	4469	3750	2990	2679	1705.1	1654	1873

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-17							MW-18						
Screened Interval	12-17'							12-17'						
Sample Date	1/17/11	7/10/12	8/8/14	10/26/17	5/25/19	6/29/22	10/18/22	Jan. 97	Jul. 97	Jan. 98	Jul. 98	Jan. 99	Jul. 99	Jan. 00
Test Method	8270D							8270D						
Acenaphthene	127	150	260	260	279	400	NA	<10	<10	<10	<10	<10	<10	<50
Acenaphthylene	<10	<100	<10	<10	<10	11.0	NA	<10	<10	<10	<10	<10	<10	<50
Acetophenone	NA	NA	NA	NA	NA	NA	82.0	NA	NA	NA	NA	NA	NA	NA
Anthracene	13.1	<100	4.3	<10	<10	<10	NA	<10	<10	<10	<10	<10	<10	<50
Carbazole	77	119	<10	190	138	400	NA	<10	<10	<10	<10	<10	<10	<50
2-Chlorophenol	<10	<100	<10	<10	<10	<10	NA	<10	<10	<10	<10	<10	<10	<50
Dibenzofuran	46.2	<100	120	120	106	240	NA	NR	NR	27	<10	<10	<10	<50
2,4-Dimethylphenol	98.2	229	170	240	142	300	NA	50	48	39	64	50	73	100
Fluoranthene	<10	<100	<10	<10	<10	<10	NA	<10	<10	<10	<10	<10	<10	<50
Fluorene	120	143	180	190	156	240	NA	NR	NR	<10	16	<10	17	<50
2-Methylnaphthalene	121	168	400	320	255	530	NA	NR	NR	<10	<10	<10	<10	<50
2-Methylphenol (o-cresol)	60.1	138	160	93	47.2	160	NA	NR	NR	<10	30	21	63	56
3,4-Methylphenol (m+p-cresol)	<10	<100	390	240	114	450	NA			66	NR	61	42	<50
4-Methylphenol	116	243				450	NA							
Naphthalene	886	1470	3200	2400	1,620	5,200	NA	150	140	68	49	110	12	330
Pentachlorophenol	<50	<500	<50	<50	<20	240	NA	<50	<50	<50	<50	<10	<10	<250
Phenanthrene	13.3	<100	36	54	82.3	140	NA	<10	<10	<10	<10	<10	<10	<50
Phenol	27.8	<100	170	100	54.9	140	NA	35	<10	46	17	35	<10	<50
2,3,4,6-Tetrachlorophenol	<10	<100	<10	<10	<20	110	NA	<50	<50	<50	<10	<10	<10	<50
2,4,6-Trichlorophenol	<10	<100	3	<10	<10	<10	NA							
Total SVOCs	1705.7	2660	5093.7	4,207	2994.4	9011.0	82.0	235	188	246	176	277	207	486

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

D = Diluted sample

ND = Not Detected

NA = Not Analyzed

NR = Not Reported

All data prior to 2017 was collected by previous consultants. Envirorisk cannot guarantee the validity of the data.

When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-18														
Screened Interval	12-17'														
Sample Date	Jul. 00	Jan. 01	Jul. 01	Jan. 02	Jul. 02	Jan. 03	Jul. 03	Jan. 04	Jul. 04	Jan. 05	Jul. 06	Jan. 07	Jul. 07	Jan. 08	Jul. 08
Test Method	8270D														
Acenaphthene	<10	12	<50	<40	<50	<100	<100	<40	<50	<200	20	20	25	<47	<47
Acenaphthylene	<10	<10	<50	<40	<50	<100	<100	<40	<50	<200	<10	<9.4	<10	<47	<47
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<10	<50	<40	<50	<100	<100	<40	<50	<200	<10	<19	<10	<47	<47
Carbazole	<10	<10	<50	<40	<50	<100	<100	<40	<50	<200	<10	<9.4	<10	<47	<47
2-Chlorophenol	<10	<10	<50	<40	<50	<100	<100	<40	<50	<200	<10	<9.4	<10	<47	<47
Dibenzofuran	<10	<10	<50	<40	<50	<100	<100	<40	<50	<200	<10	<9.4	<10	<47	<47
2,4-Dimethylphenol	<50	140	210	170	190	180	250	240	160	<200	150	96	190D	75	180
Fluoranthene	<10	<10	<50	<40	<50	<100	<100	<40	<50	<200	<10	31D	<10	<47	<47
Fluorene	<10	26	<50	<40	<50	<100	<100	46	<50	<200	33	33	42	<47	<47
2-Methylnaphthalene	<10	22	<50	<40	<50	<100	<100	46	<50	<200	33	30	50	<47	<47
2-Methylphenol (o-cresol)	<10	33	91	83	150	120	<100	120	120	<200	75	51	150	67	110
3,4-Methylphenol (m+p-cresol)	<10	42	140	97	420	260	230	290	<50	<200	120	69	190D	81	70
4-Methylphenol															
Naphthalene	<10	290	300	430	500	460	680	460	430	410	450	260D	580D	370	540
Pentachlorophenol	<10	<50	<250	<200	<250	<500	<500	<200	<250	<1000	<50	<47	<50	<240	<240
Phenanthrene	<10	<10	<50	<40	<50	<100	<100	<40	<50	<200	<10	<9.4	<10	<47	<47
Phenol	<10	<10	<50	<40	100	100	100	170	<50	<200	49	10	<10	<47	<47
2,3,4,6-Tetrachlorophenol	<10	<10	<50	<40	<50	<100	<100	<40	<50	<200	<10	<9.4	<10	<47	<47
2,4,6-Trichlorophenol												<9.4	<10	<47	<47
Total SVOCs	ND	565	741	780	1360	1120	1260	1372	710	410	930	599.5	1227	593	900

NOTES:

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When transcribing data collected by previous consultants, LT (Less Than) was rewritten as <.

Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

Well Number	MW-18													
Screened Interval	12-17'													
Sample Date	Jan. 09	7/23/09	1/18/10	7/7/10	1/17/11	2/12/12	7/10/12	2/18/13	8/21/13	2/24/14	8/8/14	2/9/15	8/11/16	2/12/16
Test Method	8270D													
Acenaphthene	<10	<20	<20	<10	80.1	15.9	<20	26.9	29.3	<40	<10	<40	24	20.6
Acenaphthylene	<10	<20	<20	<10	<10	<10	<20	<10	<10	<40	<10	<40	<10	<20
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	<10	<20	<20	<10	<10	<10	<20	<10	<10	<40	<10	<40	<10	<20
Carbazole	<10	<20	<20	<10	16.5	<10	<20	<10	<10	<40	<10	<40	<10	<20
2-Chlorophenol	<10	<20	<20	<10	<10	<10	<20	<10	<10	<40	<10	<40	<10	<20
Dibenzofuran	<10	<20	<20	<10	39.2	<10	<20	<10	<10	<40	<10	<40	<10	<20
2,4-Dimethylphenol	<10	<20	53	<10	28.2	69.4	83.4	156	140	280	<10	104	104	41
Fluoranthene	<10	<20	<20	<10	<10	<10	<20	<10	<10	<40	<10	<40	<10	<20
Fluorene	<10	23.2	<20	<10	51.5	21.8	<20	41.8	46.2	<40	<10	<40	39.6	32.9
2-Methylnaphthalene	<10	33.7	20.4	<10	42.6	31	23.3	45.5	52	46.7	<10	45	45.9	35.4
2-Methylphenol (o-cresol)	<10	32	38.5	<10	32.7	86.8	102	143	136	113	<10	103	73	34.9
3,4-Methylphenol (m+p-cresol)	<10	<20	<20	<10	<10	<10	<20	<10	<10	<40	<10	<40	<10	<20
4-Methylphenol	14.6	38.9	131	<10	48.2	236	144	244	299	244	101	336	204	96.9
Naphthalene	106	399	252	152	91.9	351	316	465	551	444	343	441	474	299
Pentachlorophenol	<50	<100	<100	<50	66.9	<50	<100	<50	<50	<200	<50	<200	<50	<100
Phenanthrene	<10	<20	<20	<10	48.9	<10	<20	<10	<10	<40	<10	<40	<10	<20
Phenol	<10	<20	29.4	<10	22.4	48	<20	38.3	28.7	<40	<10	64.2	<10	<20
2,3,4,6-Tetrachlorophenol	<10	<20	<20	<10	<10	<10	<20	<10	<10	<40	<10	<40	<10	<10
2,4,6-Trichlorophenol	<10	<20	<20	<10	<10	<10	<20	<10	<10	<40	<10	<40	<10	<20
Total SVOCs	120.6	526.8	524.3	152	569.1	859.8	668.7	1160.5	1282.2	1127.7	444	1093.2	964.6	560.7

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Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

	MW-18				MW-19									
	12-17'				10-15'									
Sample Date	10/26/17	10/26/2017 (DUP1)	5/25/19	6/29/22	7/23/09	2/12/12	7/10/12	2/18/13	8/21/13	2/24/14	8/8/14	2/9/15	8/11/15	
	8270D				8270D									
Acenaphthene	20.0	22.0	23.8	19.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Acenaphthylene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Acetophenone	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Anthracene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Carbazole	<10	<10	10.2	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
2-Chlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Dibenzofuran	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
2,4-Dimethylphenol	56.0	64.0	58.0	22.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Fluoranthene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Fluorene	29.0	33.0	37.8	26.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	
2-Methylnaphthalene	25.0	28.0	28.4	16.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	
2-Methylphenol (o-cresol)	52.0	57.0	37.9	15.0	<10	<10	<10	<10	<10	<10	<10	<10	<10	
3,4-Methylphenol (m+p-cresol)	52.0	87.0	61.1	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
4-Methylphenol				<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Naphthalene	280	330	230	170	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Pentachlorophenol	<50	<50	<20	<25	<50	<50	<50	<50	<50	<50	<50	<50	<50	
Phenanthrene	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Phenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
2,3,4,6-Tetrachlorophenol	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
2,4,6-Trichlorophenol	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	
Total SVOCs	514	621	487.2	268.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

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Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific list of SVOCs.

Acetophenone was added to the Permit in October 2022.

Table B5. Groundwater Analytical Summary (SVOCs)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)

	MW-19			
	10-15'			
Sample Date	2/12/16	10/23/17	5/25/19	6/28/22
	8270D			
Acenaphthene	<10	<10	<10	<10
Acenaphthylene	<10	<10	<10	<10
Acetophenone	NA	NA	NA	NA
Anthracene	<10	<10	<10	<10
Carbazole	<10	<10	<10	<10
2-Chlorophenol	<10	<10	<10	<10
Dibenzofuran	<10	<10	<10	<10
2,4-Dimethylphenol	<10	<10	<10	<10
Fluoranthene	<10	<10	<10	<10
Fluorene	<10	<10	<10	<10
2-Methylnaphthalene	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<10	<10	<10	<10
3,4-Methylphenol (m+p-cresol)	<10	<10	<10	<10
4-Methylphenol	<10			<10
Naphthalene	<10	<10	<10	<10
Pentachlorophenol	<50	<50	<20	<25
Phenanthrene	<10	<10	<10	<10
Phenol	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<10	<20	<10
2,4,6-Trichlorophenol	<10	<10	<10	<10
Total SVOCs	ND	ND	ND	ND

NOTES:

All constituents levels are shown in micrograms per liter (ug/l).

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All data prior to 2017 was collected by previous consultants. Envirorisk cannot guarantee the

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Wells MW-1, MW-1A, and AB5 were not sampled and are not included on this table.

Only detected constituents are listed on table. Samples were analyzed for the site specific lis

Acetophenone was added to the Permit in October 2022.

TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
February 2006 through July 2006

DAYS	MONTH		RW1R	MW2	MW3	MW4	RW2	SYSTEM*	M1**	
31	28-Jan-06	TOTAL PUMPAGE	63040	51860	108360	0	74470	297730	310810	
	to	CUMULATIVE								
	27-Feb-06	RATE/GPM	1.41	1.16	2.43	0.00	1.67	6.67	6.96	
28	28-Feb-06	TOTAL PUMPAGE	42220	53660	89150	0	50890	235920	239440	
	to	CUMULATIVE	105260	105520	197510	0	125360			
	27-Mar-06	RATE/GPM	1.05	1.33	2.21	0.00	1.26	5.85	5.94	
28	28-Mar-06	TOTAL PUMPAGE	42130	49780	64510	0	52810	211290	211290	
	to	CUMULATIVE	147390	155300	262020	0	178170			
	14-Apr-06	RATE/GPM	1.04	1.23	1.60	0.00	1.31	5.24	5.24	
28	25-Apr-06	TOTAL PUMPAGE	40760	48620	62160	0	55680	208790	208790	
	to	CUMULATIVE	188150	203920	324180	0	233850			
	22-May-06	RATE/GPM	1.01	1.21	1.54	0.00	1.38	5.18	5.18	
28	23-May-06	TOTAL PUMPAGE	43890	56960	31590	0	50370	182810	188760	
	to	CUMULATIVE	232040	260880	355770	0	284220			
	17-Jun-06	RATE/GPM	1.09	1.41	0.78	0.00	1.25	4.53	4.68	
34	20-Jun-06	TOTAL PUMPAGE	42420	55210	31590	0	48820	178040	189310	
	to	CUMULATIVE	274460	316090	387360	0	333040			
	23-Jul-06	RATE/GPM	0.87	1.13	0.65	0.00	1.00	3.64	3.87	
177								1314580	1348400	
								TOTAL		
								AVG. PUMPING RATE (GPM)	5.16	5.29

NOTES:

*System - indicates the total pumpage from tabulating the meter readings at each individual well. It varies from the totals derived from the several meters recording total outflow from the filter system.

**M1 indicates the meter that reads outflow at the filter system.

See monthly pumping records contained in Appendix B for actual field data.

TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
August 2005 through January 2006

DAYS	MONTH		RW1R	MW2	MW3	MW4	RW2	SYSTEM*	M1**
35	26-Jul-05	TOTAL PUMPAGE	66460	12220	56070	27160	96370	258280	257250
		CUMULATIVE							
	29-Aug-05	RATE/GPM	1.32	0.24	1.11	0.54	1.91	5.12	5.1
21	30-Aug-05	TOTAL PUMPAGE	27290	29000	33470	16060	49520	155340	159550
		CUMULATIVE	93750	41220	89540	43220	145890		
	19-Sep-05	RATE/GPM	0.90	0.96	1.11	0.53	1.64	5.14	5.25
35	20-Sep-05	TOTAL PUMPAGE	32650	51420	56860	22610	71860	235400	239030
		CUMULATIVE	126400	92640	146400	65830	217750		
	24-Oct-05	RATE/GPM	0.65	1.02	1.13	0.45	1.43	4.67	4.74
28	25-Oct-05	TOTAL PUMPAGE	18190	41560	47490	3950	43170	154360	156880
		CUMULATIVE	144590	134200	193890	69780	260920		
	21-Nov-05	RATE/GPM	0.45	1.03	1.18	0.10	1.07	3.83	3.89
35	22-Nov-05	TOTAL PUMPAGE	48560	57700	81610	0	60000	242510	261920
		CUMULATIVE	193150	191900	275500	69780	320920		
	26-Dec-05	RATE/GPM	0.96	1.14	1.62	0.00	1.19	4.81	5.19
32	27-Dec-05	TOTAL PUMPAGE	64560	52390	85140	0	75900	277990	275280
		CUMULATIVE	257710	244290	360640	69780	396820		
	27-Jan-06	RATE/GPM	1.40	1.14	1.85	0.00	1.65	6.03	5.98
186						TOTAL		1323880	1349910
						AVG. PUMPING RATE (GPM)		4.94	5.04

NOTES:

***System** - indicates the total pumpage from tabulating the meter readings at each individual well. It varies from the totals derived from the several meters recording total outflow from the filter system.

****M1** indicates the meter that reads outflow at the filter system.

See monthly pumping records contained in Appendix B for actual field data.

TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
July 2004 through January 2005

DAYS	MONTH		RW1R	MW2	MW3	MW4	RW2	SYSTEM*	M1**
28	27-Jul-04	TOTAL PUMPAGE	45930	32600	54390	10740	37160	180820	207270
		CUMULATIVE							
	23-Aug-04	RATE/GPM	1.14	0.81	1.35	0.27	0.92	4.48	5.14
35	24-Aug-04	TOTAL PUMPAGE	32190	35780	46660	10560	50780	175970	170530
		CUMULATIVE	78120	68380	101050	21300	87940		
	27-Sep-04	RATE/GPM	0.64	0.71	0.93	0.21	1.1	3.49	3.38
28	28-Sep-04	TOTAL PUMPAGE	37910	10810	47700	5760	54480	156660	157630
		CUMULATIVE	116030	79190	148750	27060	142420		
	25-Oct-04	RATE/GPM	0.94	0.27	1.18	0.14	1.00	3.89	3.91
27	26-Oct-04	TOTAL PUMPAGE	37540	23640	39030	6110	49640	155960	159500
		CUMULATIVE	153570	102830	187780	33170	192060		
	22-Nov-04	RATE/GPM	0.97	0.61	1.00	0.16	1.28	4.01	4.1
35	23-Nov-04	TOTAL PUMPAGE	60770	49230	63760	9160	59590	242510	240940
		CUMULATIVE	214340	152060	251540	42330	251650		
	27-Dec-04	RATE/GPM	1.21	0.98	1.27	0.18	1.18	4.81	4.78
23	28-Dec-04	TOTAL PUMPAGE	49150	30630	45510	2100	45060	172450	170550
		CUMULATIVE	263490	182690	297050	44430	296710		
	19-Jan-05	RATE/GPM	1.48	0.92	1.37	0.06	1.36	5.21	5.15
176									
							TOTAL	1084370	1106420
								AVG. PUMPING RATE (GPM)	4.27
									4.37

*System - indicates the total pumpage from tabulating the meter readings at each individual well. It varies from the totals derived from the several meters recording total outflow from the filter system.

**M1 indicates the meter that reads outflow at the filter system.

**TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
FEBRUARY 2004 THROUGH JULY 2004**

DAYS	MONTH		RW1R	MW2	MW3	MW4	RW2	SYSTEM*	M1**
19	4-Feb-04	TOTAL PUMPAGE	33950	16440	3440	6590	34030	94450	104750
		CUMULATIVE							
	22-Feb-04	RATE/GPM	1.24	0.60	0.13	0.24	1.1	3.45	
29	23-Feb-04	TOTAL PUMPAGE	51720	17580	8400	21200	52710	151610	163690
		CUMULATIVE	85670	34020	11840	27790	86740		
	22-Mar-04	RATE/GPM	1.24	0.42	0.20	0.51	1.1	3.63	
35	23-Mar-04	TOTAL PUMPAGE	56300	47090	9440	11610	60900	185340	197440
		CUMULATIVE	141970	81110	21280	39400	147640		
	26-Apr-04	RATE/GPM	1.12	0.93	0.19	0.23	1.00	3.68	
28	27-Apr-04	TOTAL PUMPAGE	29820	21320	10	5790	25180	82120	84890
		CUMULATIVE	171790	102430	21290	45190	172820		
	24-May-04	RATE/GPM	0.74	0.53	0.00	0.14	0.62	2.04	
28	25-May-04	TOTAL PUMPAGE	21800	11520	7650	11780	23400	76150	77740
		CUMULATIVE	193590	113950	28940	56970	196220		
	21-Jun-04	RATE/GPM	0.54	0.29	0.19	0.29	0.58	1.89	
34	22-Jun-04	TOTAL PUMPAGE	63610	31210	30400	22380	53470	201070	207960
		CUMULATIVE	257200	145160	59340	79350	249690		
	26-Jul-04	RATE/GPM	1.30	0.64	0.62	0.46	1.09	4.11	
173									
							TOTAL	790740	836470
							AVG. PUMPING RATE (GPM)	3.17	3.36

*System - indicates the total pumpage from tabulating the meter readings at each individual well. It varies from the totals derived from the several meters recording total outflow from the filter system.

**M1 indicates the meter that reads outflow at the filter system.

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TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
AUGUST 2003 THROUGH JANUARY 2004

DAYS	MONTH		RW1R	MW2	MW3	MW4	RW2	SYSTEM*	M1**
36	21-Jul-03	TOTAL PUMPAGE	10840	43880	32070	1520	56260	144570	157960
		CUMULATIVE							
	25-Aug-03	RATE/GPM	0.21	0.85	0.62	0.03	0	2.79	
34	26-Aug-03	TOTAL PUMPAGE	65220	28840	54290	45790	58610	252750	280700
		CUMULATIVE	76060	72720	86360	47310			
	29-Sep-03	RATE/GPM	1.33	0.59	1.11	0.94	1.1	5.16	
28	30-Sep-03	TOTAL PUMPAGE	51470	16590	38910	36340	52660	195970	202450
		CUMULATIVE	127530	89310	125270	83650	167530		
	27-Oct-03	RATE/GPM	1.28	0.41	0.97	0.90	1.00	4.86	
28	28-Oct-03	TOTAL PUMPAGE	24900	3190	12480	16070	25260	81900	83750
		CUMULATIVE	152430	92500	137750	99720	192790		
	24-Nov-03	RATE/GPM	0.62	0.08	0.31	0.40	0.63	2.03	
27	25-Nov-03	TOTAL PUMPAGE	51290	27540	49810	33700	51360	213700	201420
		CUMULATIVE	203720	120040	187560	133420	244150		
	21-Dec-03	RATE/GPM	1.32	0.71	1.28	0.87	1.32	5.50	
44	22-Dec-03	TOTAL PUMPAGE	73660	40090	47390	36630	73700	271470	286300
		CUMULATIVE	277380	160130	234950	170050	317850		
	4-Feb-04	RATE/GPM	1.16	0.63	0.75	0.58	1.16	4.28	4.51
197								TOTAL	1160360
									1212580
								AVG. PUMPING RATE (GPM)	4.09
									4.27

*System - indicates the total pumpage from tabulating the meter readings at each individual well. It varies from the totals derived from the several meters recording total outflow from the filter system.

**M1 indicates the meter that reads outflow at the filter system.

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**TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
JANUARY 2003 THROUGH JULY 2003**

DAYS	MONTH		RW1R	MW2	MW3	MW4	RW2	SYSTEM*	M1**
28	28-Jan-03	TOTAL PUMPAGE	23670	14550	29210	11190	0	78620	67950
		CUMULATIVE							
	24-Feb-03	RATE/GPM	0.59	0.36	0.72	0.28	0	1.95	
29	25-Feb-03	TOTAL PUMPAGE	15450	3630	33590	15010	46010	113690	120720
		CUMULATIVE	39120	18180	62800	26200			188670
	25-Mar-03	RATE/GPM	0.37	0.09	0.80	0.36	1.1	2.72	
31	26-Mar-03	TOTAL PUMPAGE	22120	4392	36480	8600	44490	116082	123560
		CUMULATIVE	61240	22572	99280	34800	90500		312230
	28-Apr-03	RATE/GPM	0.50	0.10	0.82	0.19	1.00	2.60	
29	29-Apr-03	TOTAL PUMPAGE	35410	29588	33450	4540	50740	153728	170220
		CUMULATIVE	96650	52160	132730	39340	141240		482450
	27-May-03	RATE/GPM	0.85	0.71	0.80	0.11	1.22	3.68	
28	28-May-03	TOTAL PUMPAGE	27740	30760	24700	11910	40370	135480	138480
		CUMULATIVE	124390	82920	157430	51250	181610		621230
	25-Jun-03	RATE/GPM	0.69	0.76	0.61	0.30	1.00	3.36	
25	26-Jun-03	TOTAL PUMPAGE	22410	280	20760	10950	44670	99070	114580
		CUMULATIVE	146800	83200	178190	62200	226280	696670	735810
	21-Jul-03	RATE/GPM	0.62	0.01	0.58	0.30	1.24	2.75	
170						Average		2.84	2.96

*System - indicates the total pumpage from tabulating the meter readings at each individual well. It varies from the totals derived from the several meters recording total outflow from the filter system.

**M1 indicates the meter that reads outflow at the filter system.

**TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
AUGUST 2002 THROUGH JANUARY 2003**

DAYS	MONTH		RW1R	MW2	MW3	MW4	SYSTEM	FILTER/INTAKE
28	30-Jul-02	TOTAL PUMPAGE	13320	29120	18450	10240	71130	81020
		CUMULATIVE						
	26-Aug-02	RATE/GPM	0.33	0.72	0.46	0.25	1.76	
28	27-Aug-02	TOTAL PUMPAGE	21890	33350	25430	16350	97020	112070
		CUMULATIVE	35210	62470	43880	26590	168150	193090
	23-Sep-02	RATE/GPM	0.54	0.83	0.63	0.41	2.41	
34	24-Sep-02	TOTAL PUMPAGE	29470	51900	25430	20350	127150	140570
		CUMULATIVE	64680	114370	69310	46940	295300	333660
	27-Oct-02	RATE/GPM	0.60	1.06	0.52	0.42	2.60	
36	28-Oct-02	TOTAL PUMPAGE	28250	41680	27730	12670	110370	119660
		CUMULATIVE	92930	156050	97040	59610	405620	453320
	2-Dec-02	RATE/GPM	0.55	0.80	0.53	0.24	2.13	
28	3-Dec-02	TOTAL PUMPAGE	22460	43400	25610	8730	100200	106090
		CUMULATIVE	115390	199450	122650	68340	505820	559410
	30-Dec-02	RATE/GPM	0.56	1.08	0.64	0.22	2.49	
28	31-Dec-02	TOTAL PUMPAGE	24140	45040	21260	13810	104250	116430
		CUMULATIVE	139530	244490	143910	82150	610070	675840
	27-Jan-03	RATE/GPM	0.60	1.12	0.53	0.34	2.59	
182						Average	2.33	2.57

NOTES: Cumulative total gallons of filter intake is greater than computed by pump end meter readings. This is shown on monthly report as exp/pond. This difference is approximately 11%.

System - indicates total obtained by adding meter reading from each pump
Filter/intake - meter reading at intake of filter system

0.31

TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
JANUARY 2003 THROUGH JULY 2003

DAYS	MONTH		RW1R	MW2	MW3	MW4	RW2	SYSTEM*	M1**
28	28-Jan-03	TOTAL PUMPAGE	23670	14550	29210	11190	0	78620	67950
		CUMULATIVE							
	24-Feb-03	RATE/GPM	0.59	0.36	0.72	0.28	0	1.95	
29	25-Feb-03	TOTAL PUMPAGE	15450	3630	33590	15010	46010	113690	120720
		CUMULATIVE	39120	18180	62800	26200			188670
	25-Mar-03	RATE/GPM	0.37	0.09	0.80	0.36	1.1	2.72	
31	26-Mar-03	TOTAL PUMPAGE	22120	4392	36480	8600	44490	116082	123560
		CUMULATIVE	61240	22572	99280	34800	90500		312230
	28-Apr-03	RATE/GPM	0.50	0.10	0.82	0.19	1.00	2.60	
29	29-Apr-03	TOTAL PUMPAGE	35410	29588	33450	4540	50740	153728	170220
		CUMULATIVE	96650	52160	132730	39340	141240		482450
	27-May-03	RATE/GPM	0.85	0.71	0.80	0.11	1.22	3.68	
28	28-May-03	TOTAL PUMPAGE	27740	30760	24700	11910	40370	135480	138480
		CUMULATIVE	124390	82920	157430	51250	181610		621230
	25-Jun-03	RATE/GPM	0.69	0.76	0.61	0.30	1.00	3.36	
25	26-Jun-03	TOTAL PUMPAGE	22410	280	20760	10950	44670	99070	114580
		CUMULATIVE	146800	83200	178190	62200	226280	696670	735810
	21-Jul-03	RATE/GPM	0.62	0.01	0.58	0.30	1.24	2.75	
170						Average		2.84	2.96

*System - indicates the total pumpage from tabulating the meter readings at each individual well. It varies from the totals derived from the several meters recording total outflow from the filter system.

**M1 indicates the meter that reads outflow at the filter system.

4.26

**TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
AUGUST 2002 THROUGH JANUARY 2003**

DAYS	MONTH		RW1R	MW2	MW3	MW4	SYSTEM	FILTER/INTAKE
28	30-Jul-02	TOTAL PUMPAGE	13320	29120	18450	10240	71130	81020
		CUMULATIVE						
	26-Aug-02	RATE/GPM	0.33	0.72	0.46	0.25	1.76	
28	27-Aug-02	TOTAL PUMPAGE	21890	33350	25430	16350	97020	112070
		CUMULATIVE	35210	62470	43880	26590	168150	193090
	23-Sep-02	RATE/GPM	0.54	0.83	0.63	0.41	2.41	
34	24-Sep-02	TOTAL PUMPAGE	29470	51900	25430	20350	127150	140570
		CUMULATIVE	64680	114370	69310	46940	295300	333660
	27-Oct-02	RATE/GPM	0.60	1.06	0.52	0.42	2.60	
36	28-Oct-02	TOTAL PUMPAGE	28250	41680	27730	12670	110370	119660
		CUMULATIVE	92930	156050	97040	59610	405620	453320
	2-Dec-02	RATE/GPM	0.55	0.80	0.53	0.24	2.13	
28	3-Dec-02	TOTAL PUMPAGE	22460	43400	25610	8730	100200	106090
		CUMULATIVE	115390	199450	122650	68340	505820	559410
	30-Dec-02	RATE/GPM	0.56	1.08	0.64	0.22	2.49	
28	31-Dec-02	TOTAL PUMPAGE	24140	45040	21260	13810	104250	116430
		CUMULATIVE	139530	244490	143910	82150	610070	675840
	27-Jan-03	RATE/GPM	0.60	1.12	0.53	0.34	2.59	
182						Average	2.33	2.57

NOTES: Cumulative total gallons of filter intake is greater than computed by pump end meter readings. This is shown on monthly report as exp/pond. This difference is approximately 11%.

System - indicates total obtained by adding meter reading from each pump

Filter/Intake - meter reading at intake of filter system

**TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
FEBRUARY 2002 THROUGH JULY 2002**

DAYS	MONTH		RW1R	MW2	MW3	MW4	SYSTEM	FILTER/INTAKE
27	30-Jan-02 to 25-Feb-02	TOTAL PUMPAGE CUMULATIVE	21750	26260	21990	13710	83710	89930
		RATE/GPM	0.56	0.68	0.57	0.35	2.15	
28	26-Feb-02 to 25-Mar-02	TOTAL PUMPAGE CUMULATIVE	39700	40330	35420	16390	131840	136270
		RATE/GPM	0.98	1.00	0.88	0.41	3.27	226200
36	26-Mar-02 to 30-Apr-02	TOTAL PUMPAGE CUMULATIVE	50890	40720	45510	25410	162530	173300
		RATE/GPM	112340	107310	102920	55510	378080	399500
27	1-May-02 to 27-May-02	TOTAL PUMPAGE CUMULATIVE	32510	37940	26520	15690	112660	122240
		RATE/GPM	144850	145250	129440	71200	490740	521740
29	28-May-02 to 25-Jun-02	TOTAL PUMPAGE CUMULATIVE	29520	37850	24090	17230.0	108690.0	121520
		RATE/GPM	174370	183100	153530	88430.0	599430.0	643260
35	26-Jun-02 to 30-Jul-02	TOTAL PUMPAGE CUMULATIVE	19620	35580	23960	14950	94110	103340
		RATE/GPM	193990	218680	177490	103380	693540	746600
182							Average	2.65
								2.84 gpm

NOTES: Cumulative total gallons of filter intake is greater than computed by pump end meter readings. This is shown on monthly report as exp/pond. This difference is only around 1%.

System - indicates total obtained by adding meter reading from each pump
Filter/Intake - meter reading at intake of filter system

36

**TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
AUGUST 2001 THROUGH JANUARY 2002**

DAYS	MONTH		RW1R	MW2	MW3A	MW4A	SYSTEM	FILTER/INTAKE
30	30-Jul-01 to 29-Aug-01	TOTAL PUMPAGE CUMULATIVE	40760	21450	30950	15470	108630	120630
		RATE/GPM	0.94	0.5	0.72	0.36	2.51	
27	29-Aug-01 to 24-Sep-01	TOTAL PUMPAGE CUMULATIVE	32790	34960	34310	12390	114450	123120
		RATE/GPM	73350	56410	65260	27860	223080	243750
		RATE/GPM	0.84	0.90	0.88	0.32	2.94	
29	25-Sep-01 to 23-Oct-01	TOTAL PUMPAGE CUMULATIVE	37840	42470	26910	17610	124830	128180
		RATE/GPM	111390	98880	92170	45470	347910	372300
		RATE/GPM	0.91	1.02	0.64	0.42	2.99	
35	24-Oct-01 to 27-Nov-01	TOTAL PUMPAGE CUMULATIVE	46810	43550	33140	18180	141680	148550
		RATE/GPM	158200	142430	125310	63650	489590	520850
		RATE/GPM	0.93	0.86	0.66	0.36	2.81	
30	28-Nov-01 to 27-Dec-01	TOTAL PUMPAGE CUMULATIVE	23040	35550	30030	13180.0	105870.0	112810
		RATE/GPM	181240	177980	155340	76830.0	595460.0	633660
		RATE/GPM	0.53	0.82	0.69	0.31	2.45	
31	28-Dec-01 to 29-Jan-01	TOTAL PUMPAGE CUMULATIVE	24550	40550	34300	13180	112580	123420
		RATE/GPM	205790	218530	189640	90010	708040	757080
		RATE/GPM	0.55	0.91	0.77	0.29	2.52	
182							Average 2.70	2.88 gpm

NOTES: Cumulative total gallons of filter intake is greater than computed by pump end meter readings. This is shown on monthly report as exp/pond. This difference is only around 1%.

System - indicates total obtained by adding meter reading from each pump

Filter/Intake - meter reading at intake of filter system

**TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY
FEBRUARY - JULY 2001**

DAYS	MONTH		RW1R	MW2	MW3	MW4	SYSTEM	FILTER/INTAKE
27	31-Jan-01 to 26-Feb-01	TOTAL PUMPAGE CUMULATIVE	37890	46030	43530	17850	145300	146430
		RATE/GPM	0.97	1.18	1.12	0.46	3.74	
27	27-Feb-01 to 25-Mar-01	TOTAL PUMPAGE CUMULATIVE	50970	45540	51020	19030	166560	172010
		RATE/GPM	1.31	1.17	1.31	0.49	4.28	318440
28	26-Mar-01 to 22-Apr-01	TOTAL PUMPAGE CUMULATIVE	72550	48260	43110	15230	179150	186470
		RATE/GPM	1.80	1.19	1.07	0.37	4.44	504940
35	23-Apr-01 to 27-May-01	TOTAL PUMPAGE CUMULATIVE	58970	74760	35480	20000	194330	201880
		RATE/GPM	1.17	1.48	0.70	0.39	3.86	706820
29	28-May-01 to 25-Jun-01	TOTAL PUMPAGE CUMULATIVE	61280	67210	36820	18890	179080	188760
		RATE/GPM	1.46	1.61	0.88	0.45	4.29	895580
34	26-Jun-01 to 29-Jul-01	TOTAL PUMPAGE CUMULATIVE	66530	41640	53990	22980	185140	196160
		RATE/GPM	1.36	0.85	1.10	0.46	3.78	1091740

NOTE: Cumulative total gallons of filter intake is greater than computed by pump end meter readings. This is shown on monthly report as exp/pond. This difference is only around 1%.

The monthly production figures are taken from the data shown on the printouts in Appendix B and reflect a total of 180 days of operation.

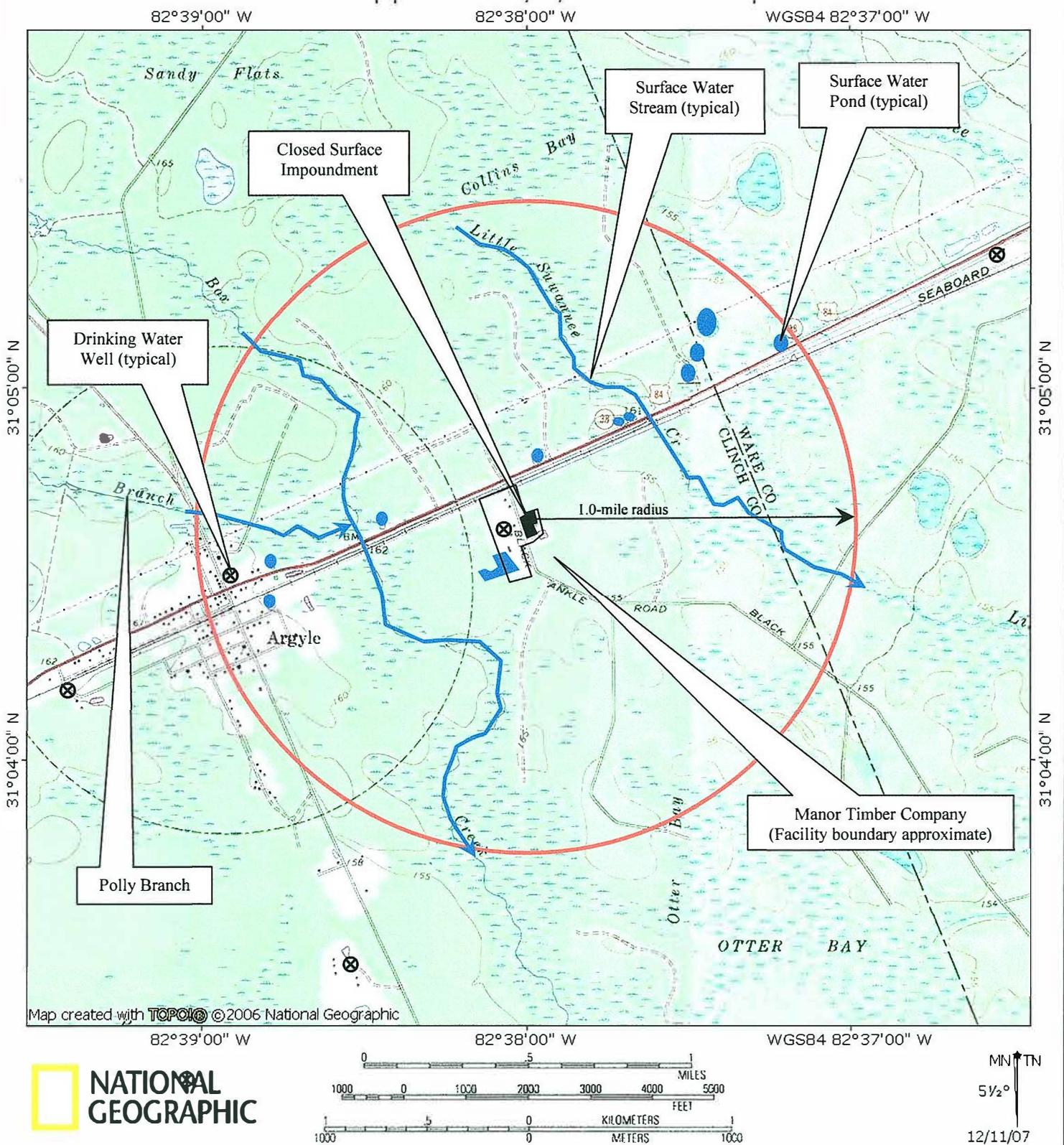
**TABLE B6
SUMMARY OF REMEDIATION SYSTEM
MANOR TIMBER COMPANY**

DAYS	MONTH		RW1R	MW2	MW3	MW4	SYSTEM	FILTER/INTAKE
36	24-Jul-00 to 29-Aug-00	TOTAL PUMPAGE CUMULATIVE RATE/GPM	64940 1.25	50930 0.98	30240 0.58	23300 0.45	169410 3.27	162950
28	29-Aug-00 to 26-Sep-00	TOTAL PUMPAGE CUMULATIVE RATE/GPM	57170 122110 1.41	55380 106310 1.37	55140 85340 1.37	20610 43910 0.51	188260 357670 4.67	194020 356970
28	26-Sep-00 to 24-Oct-00	TOTAL PUMPAGE CUMULATIVE RATE/GPM	50510 172620 1.25	47680 153990 1.18	37280 122620 0.92	17100 67010 0.42	152570 510240 3.8	157350 514320
35	24-Oct-00 to 28-Nov-00	TOTAL PUMPAGE CUMULATIVE RATE/GPM	56920 229450 1.13	62140 216130 1.2	54770 177390 1.09	22630 83640 0.44	196460 706700 3.9	199390 713710
28	28-Nov-00 to 26-Dec-00	TOTAL PUMPAGE CUMULATIVE RATE/GPM	50270 279810 1.24	50500 266630 1.25	52750 230140 1.31	20280 103920 0.5	173800 880500 4.31	176010 889710
36	26-Dec-00 to 31-Jan-01	TOTAL PUMPAGE CUMULATIVE RATE/GPM	63610 343420 1.2	60740 327370 1.2	67850 297990 1.31	26330 130250 0.51	218530 1099030 4.22	224170 1113890

NOTE: Cumulative total gallons of filter intake is greater than computed by pump end meter readings. This is shown on monthly report as exp/pond. This difference is only around 1%.

3.5 exp/pond

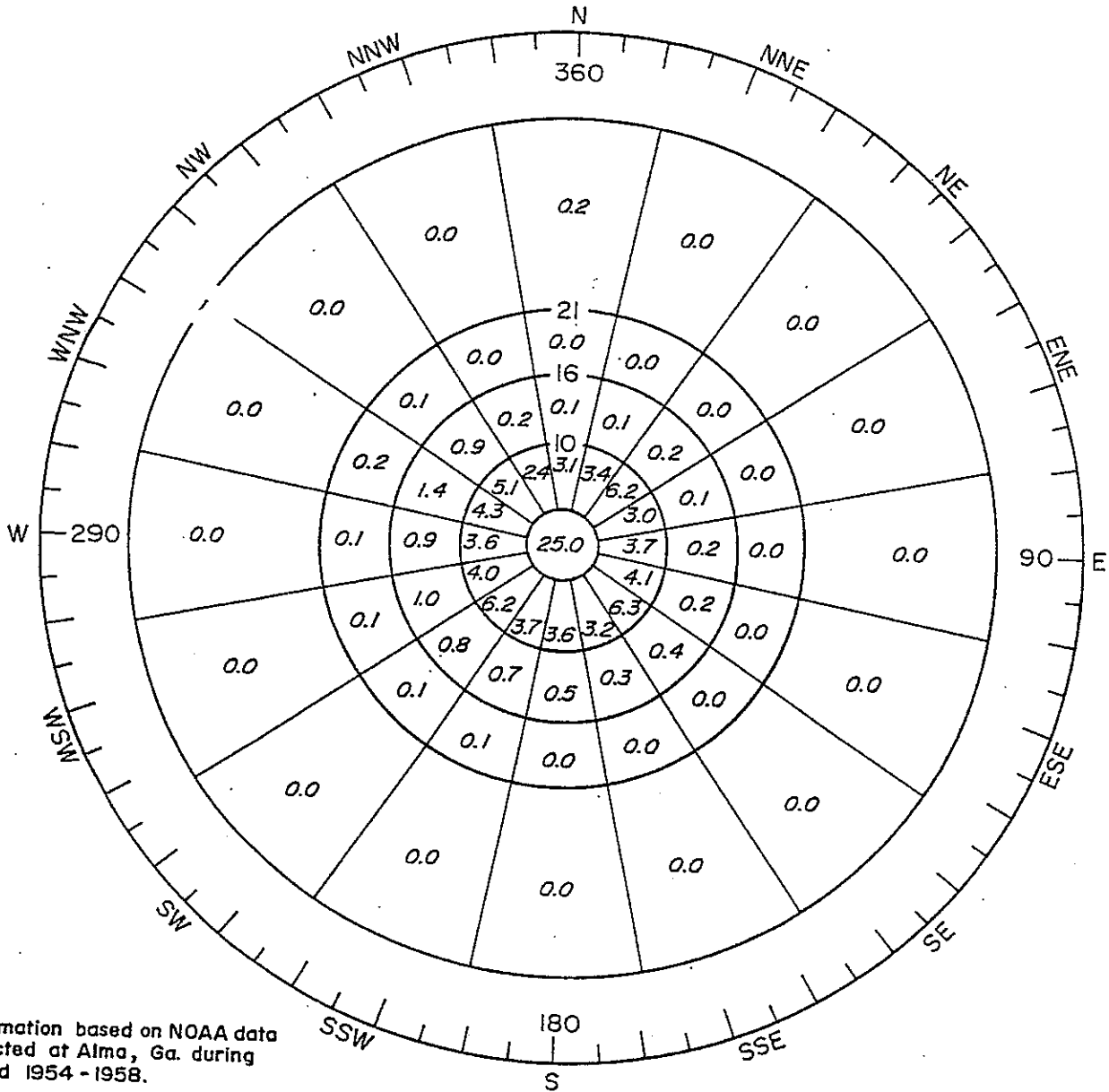
Map prepared from a copy of the USGS Homerville, East, Ga 1988 7.5 minute Quadrangle.



EnviroRisk Consultants, Inc.
PO Box 945
Grayson, GA 30017

MANOR TIMBER COMPANY
102 BLCK ANKLE ROAD
MANOR, CLINCH COUNTY, GEORGIA
GEORGIA HAZARDOUS WASTE PERMIT NO. HW-047 (D)

FIGURE
B-2

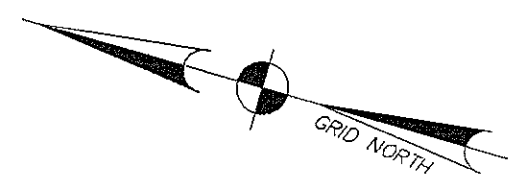
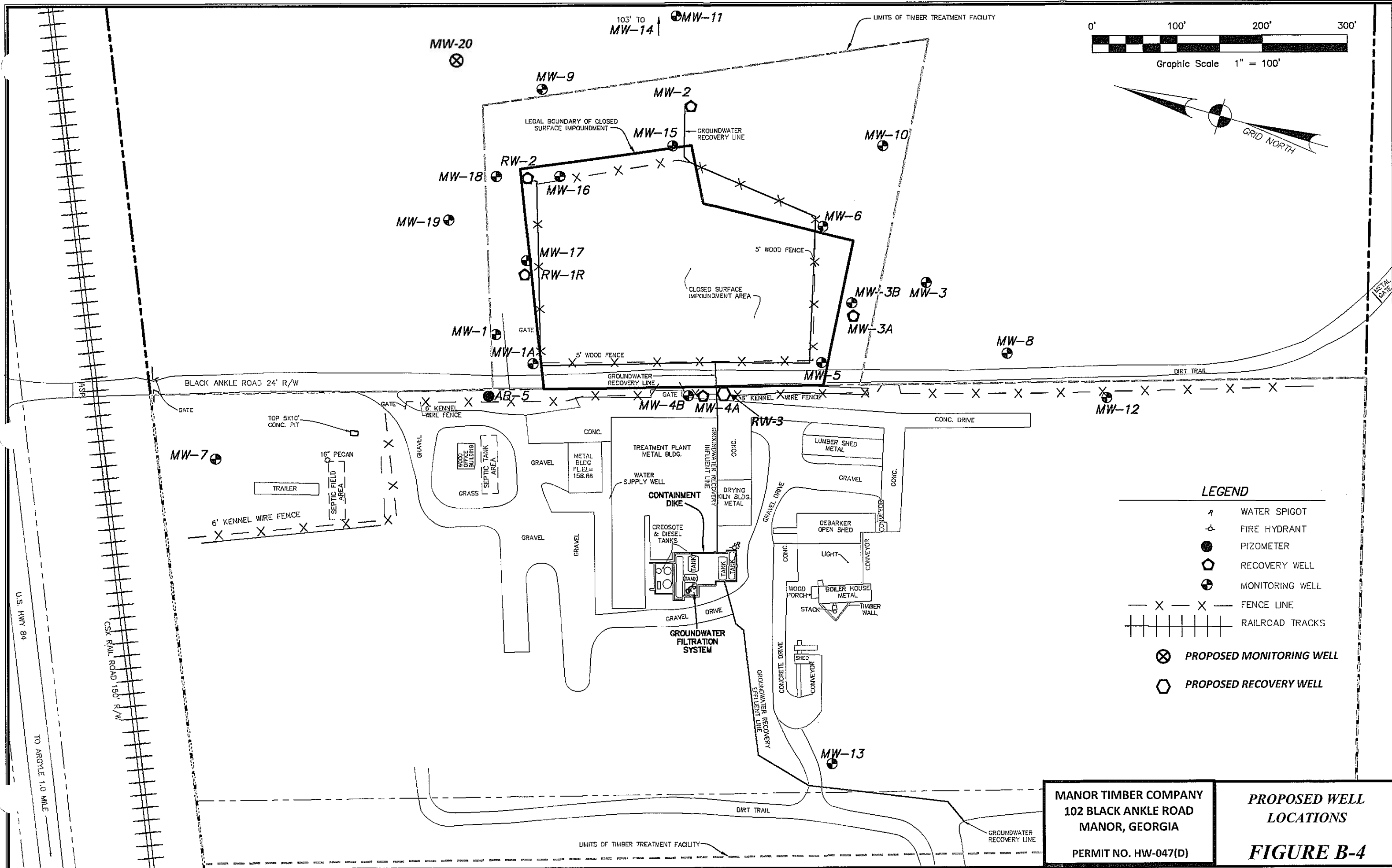


NOTES

1. Information based on NOAA data collected at Alma, Ga. during period 1954 - 1958.
2. Prevailing wind out of the SW at average speed of 7.6 knots.

WIND ROSE

FIGURE B-3



LEGEND

- ⌵ WATER SPIGOT
- ⊕ FIRE HYDRANT
- PIZOMETER
- ⬠ RECOVERY WELL
- ⊕ MONITORING WELL
- X — X — FENCE LINE
- ||| RAILROAD TRACKS
- ⊗ PROPOSED MONITORING WELL
- ⬠ PROPOSED RECOVERY WELL

MANOR TIMBER COMPANY
 102 BLACK ANKLE ROAD
 MANOR, GEORGIA
 PERMIT NO. HW-047(D)

**PROPOSED WELL
 LOCATIONS**
FIGURE B-4

LEGEND

- ⊙ WATER SPIGOT
- ⊕ FIRE HYDRANT
- PIZOMETER
- ⊕ RECOVERY WELL
- ⊕ MONITORING WELL
- X - X - FENCE LINE
- ||| RAILROAD TRACKS

155.09 WATERLEVEL ELEVATION

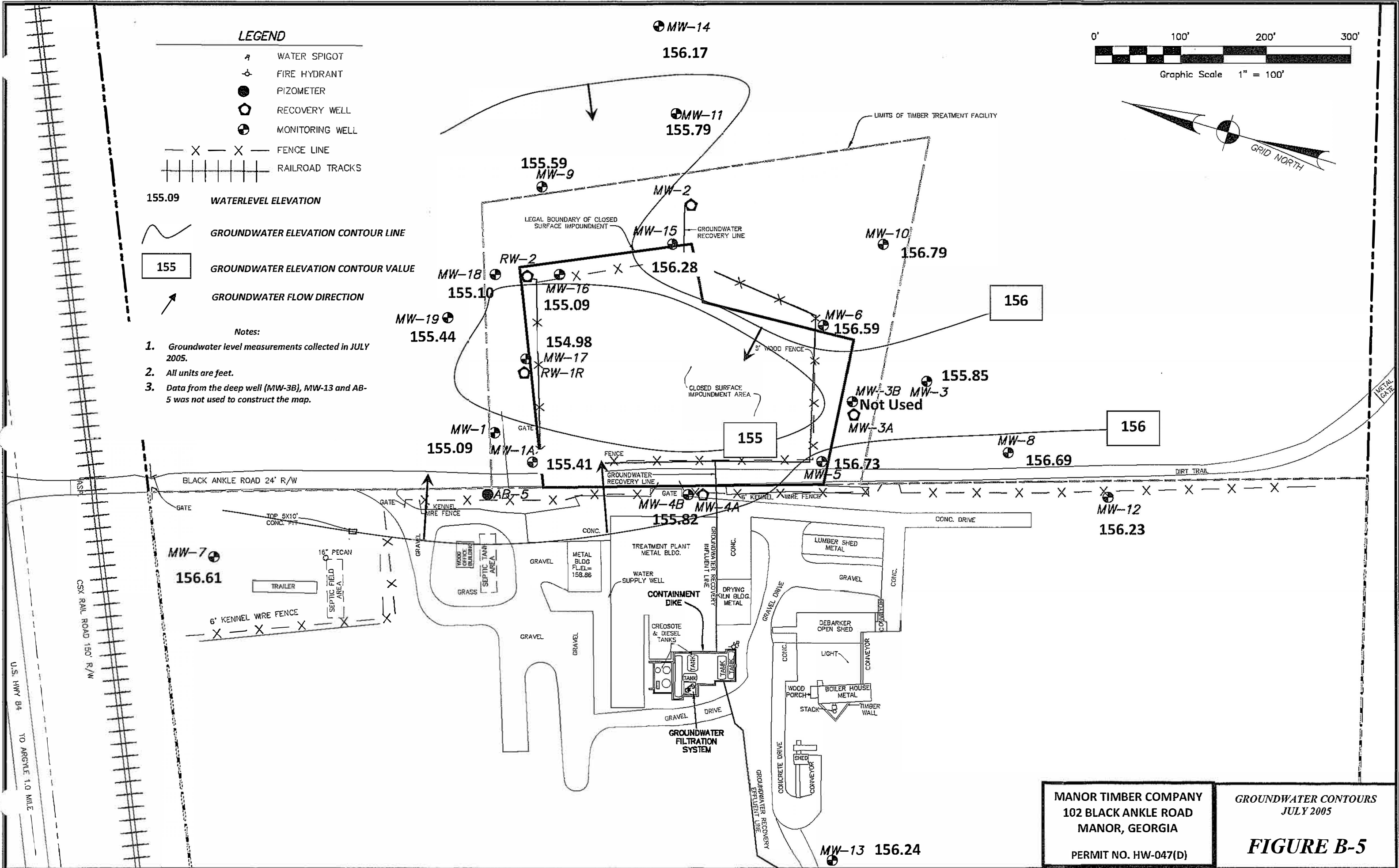
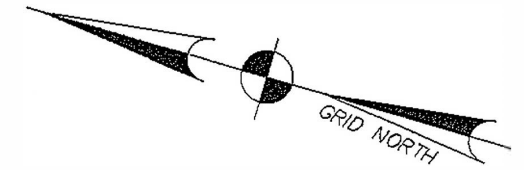
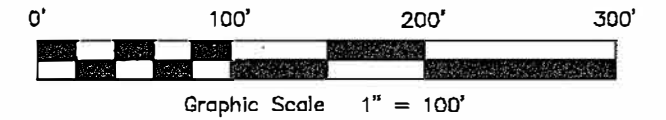
GROUNDWATER ELEVATION CONTOUR LINE

155 GROUNDWATER ELEVATION CONTOUR VALUE

GROUNDWATER FLOW DIRECTION

Notes:

1. Groundwater level measurements collected in JULY 2005.
2. All units are feet.
3. Data from the deep well (MW-3B), MW-13 and AB-5 was not used to construct the map.



U.S. HWY 84 TO ARCYLE 1.0 MILE

CSX RAIL ROAD 150' R/W

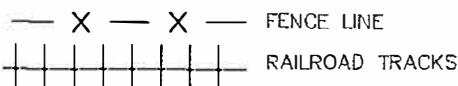
MANOR TIMBER COMPANY
 102 BLACK ANKLE ROAD
 MANOR, GEORGIA
 PERMIT NO. HW-047(D)

GROUNDWATER CONTOURS
 JULY 2005

FIGURE B-5

LEGEND

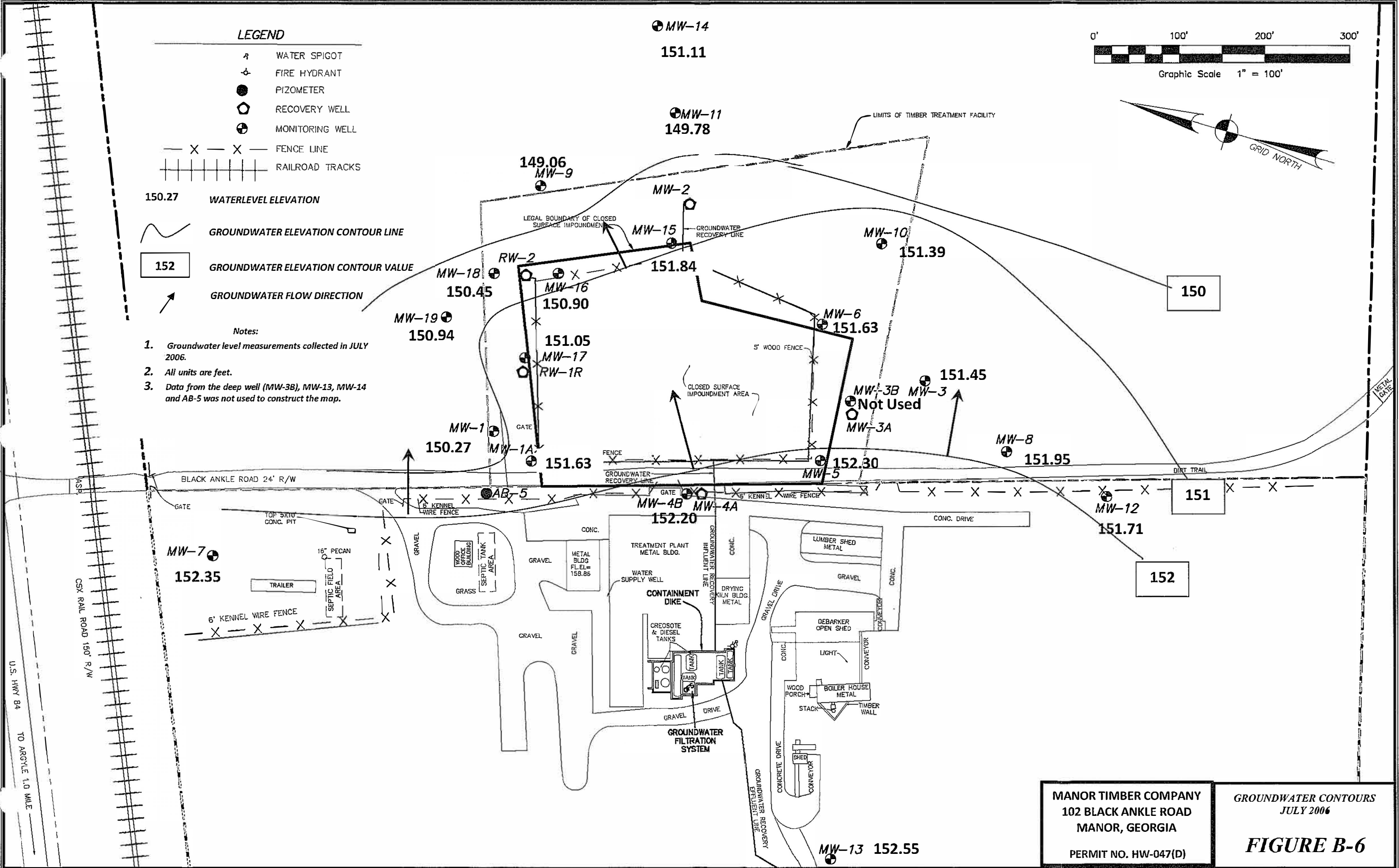
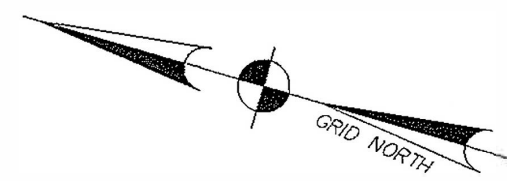
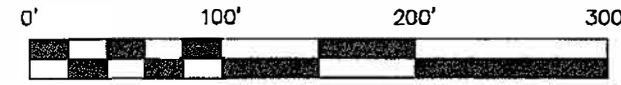
- ⊕ WATER SPIGOT
- ⊕ FIRE HYDRANT
- PIZOMETER
- ⊕ RECOVERY WELL
- ⊕ MONITORING WELL



- 150.27 WATERLEVEL ELEVATION
- GROUNDWATER ELEVATION CONTOUR LINE
- 152 GROUNDWATER ELEVATION CONTOUR VALUE
- GROUNDWATER FLOW DIRECTION

Notes:

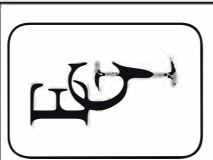
1. Groundwater level measurements collected in JULY 2006.
2. All units are feet.
3. Data from the deep well (MW-3B), MW-13, MW-14 and AB-5 was not used to construct the map.



MANOR TIMBER COMPANY
 102 BLACK ANKLE ROAD
 MANOR, GEORGIA
 PERMIT NO. HW-047(D)

GROUNDWATER CONTOURS
 JULY 2006

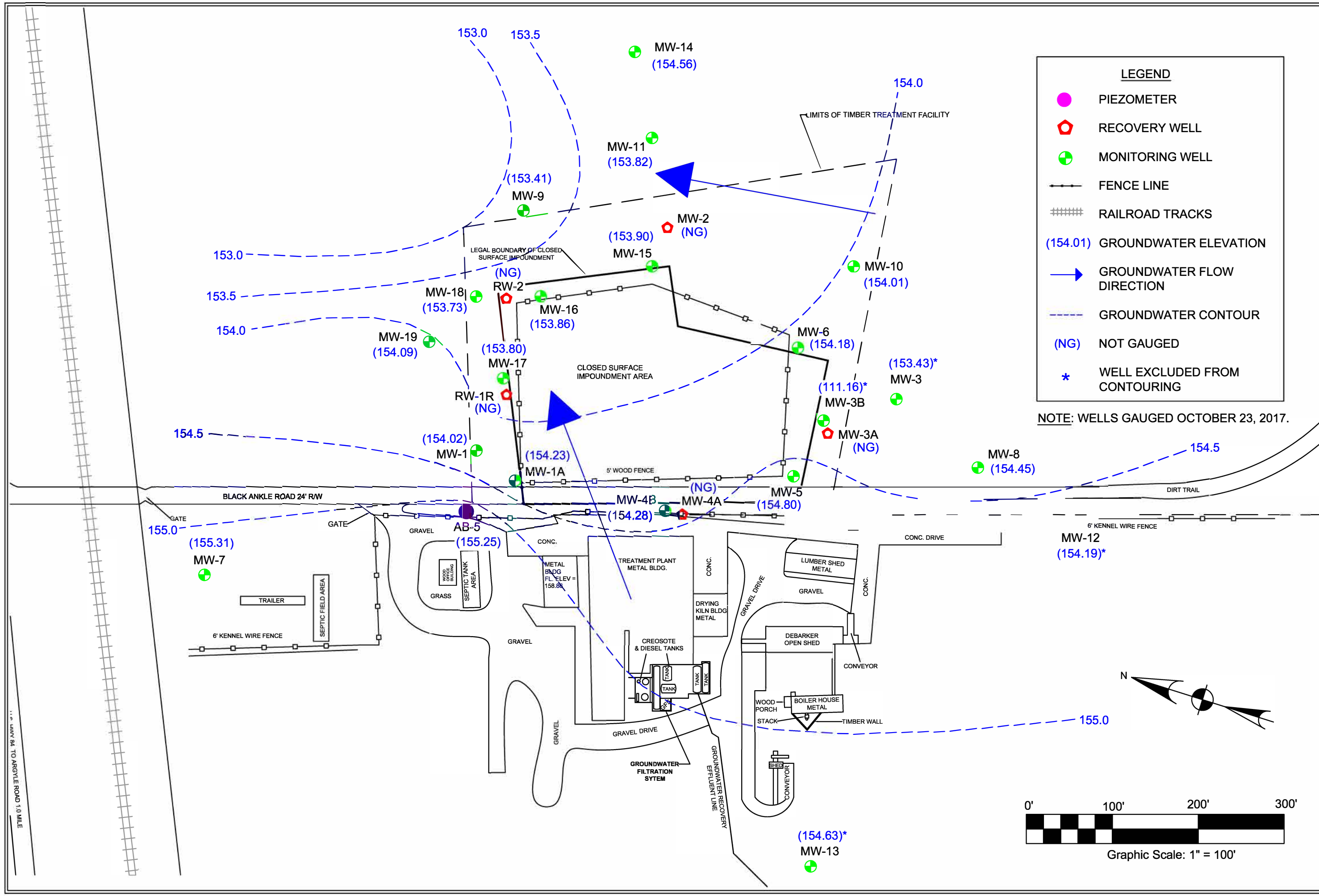
FIGURE B-6



**ENVIORISK
CONSULTANTS, INC.**

**MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA**

FIGURE NO
B7



1.0 MILE
1.0 MILE TO ARGYLE ROAD



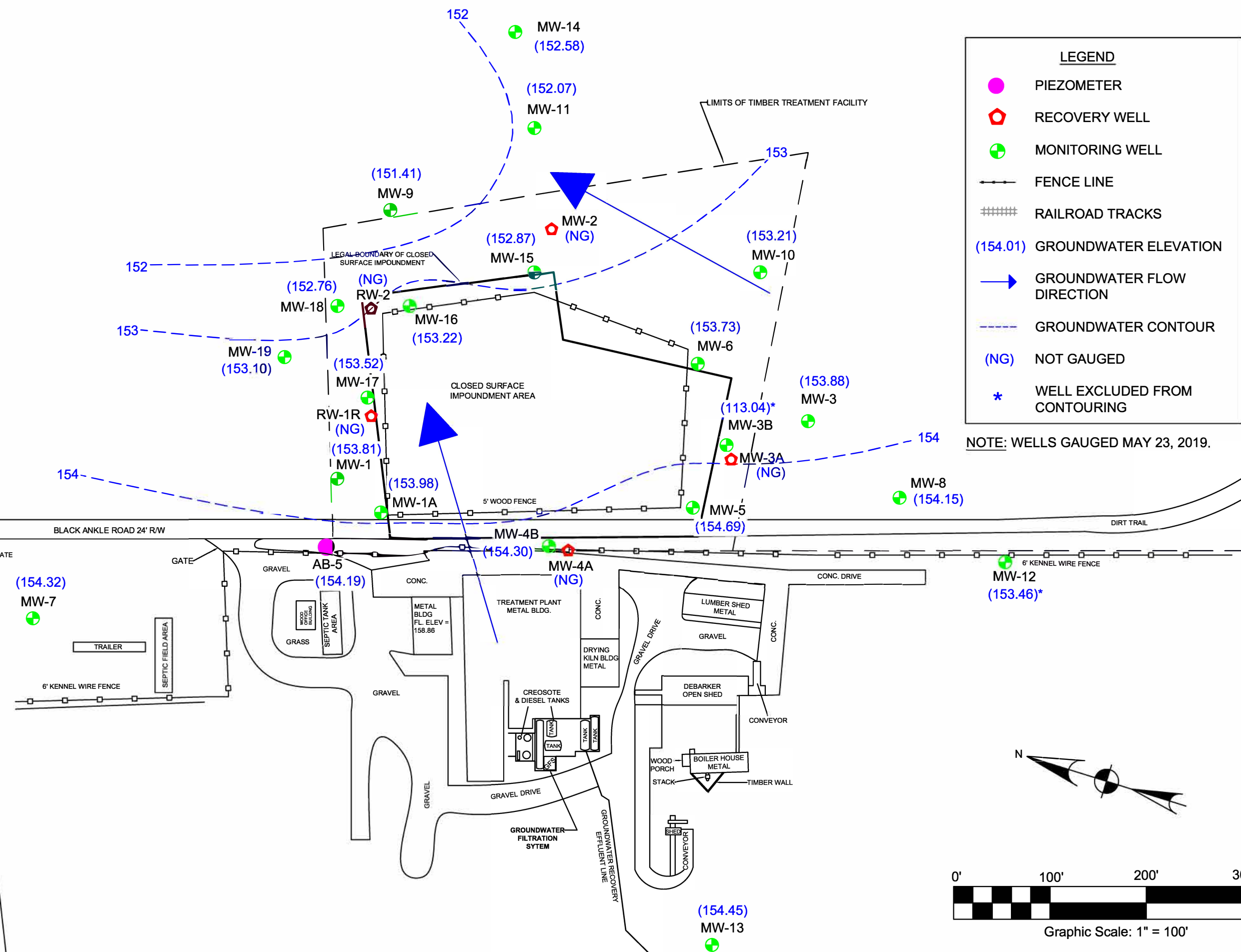
ENVIORISK
CONSULTANTS, INC.

MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA

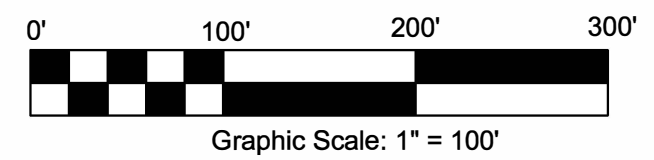
POTENTIOMETRIC SURFACE MAP (5/23/2019)

FIGURE NO

B8



1.0 MILE TO ARGYLE ROAD 1.0 MILE



LEGEND

- ⊙ WATER SPIGOT
- ⊕ FIRE HYDRANT
- PIZOMETER
- ⊖ RECOVERY WELL
- ⊕ MONITORING WELL
- X - X - FENCE LINE
- ||||| RAILROAD TRACKS

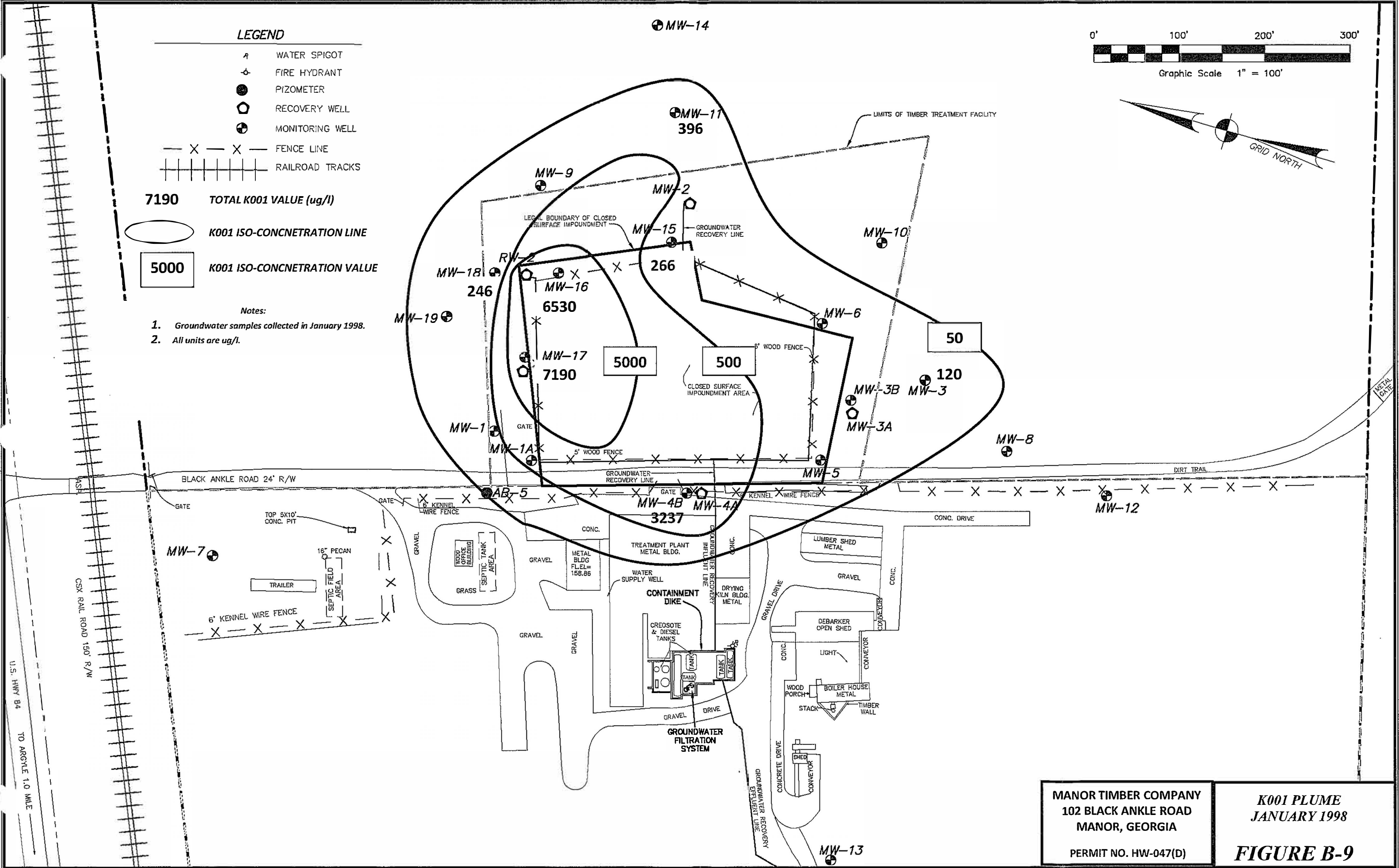
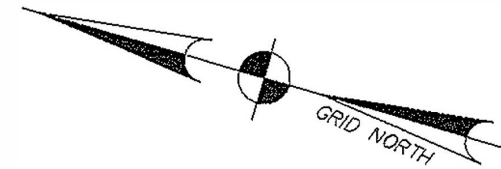
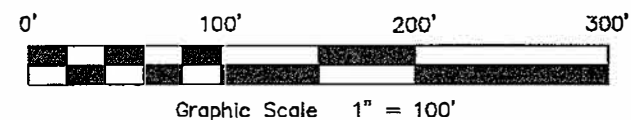
7190 TOTAL K001 VALUE (ug/l)

K001 ISO-CONCENTRATION LINE

5000 K001 ISO-CONCENTRATION VALUE

Notes:

1. Groundwater samples collected in January 1998.
2. All units are ug/l.



MANOR TIMBER COMPANY
 102 BLACK ANKLE ROAD
 MANOR, GEORGIA
 PERMIT NO. HW-047(D)

K001 PLUME
 JANUARY 1998
FIGURE B-9

LEGEND

- WATER SPIGOT
- FIRE HYDRANT
- PIZOMETER
- RECOVERY WELL
- MONITORING WELL
- FENCE LINE
- RAILROAD TRACKS

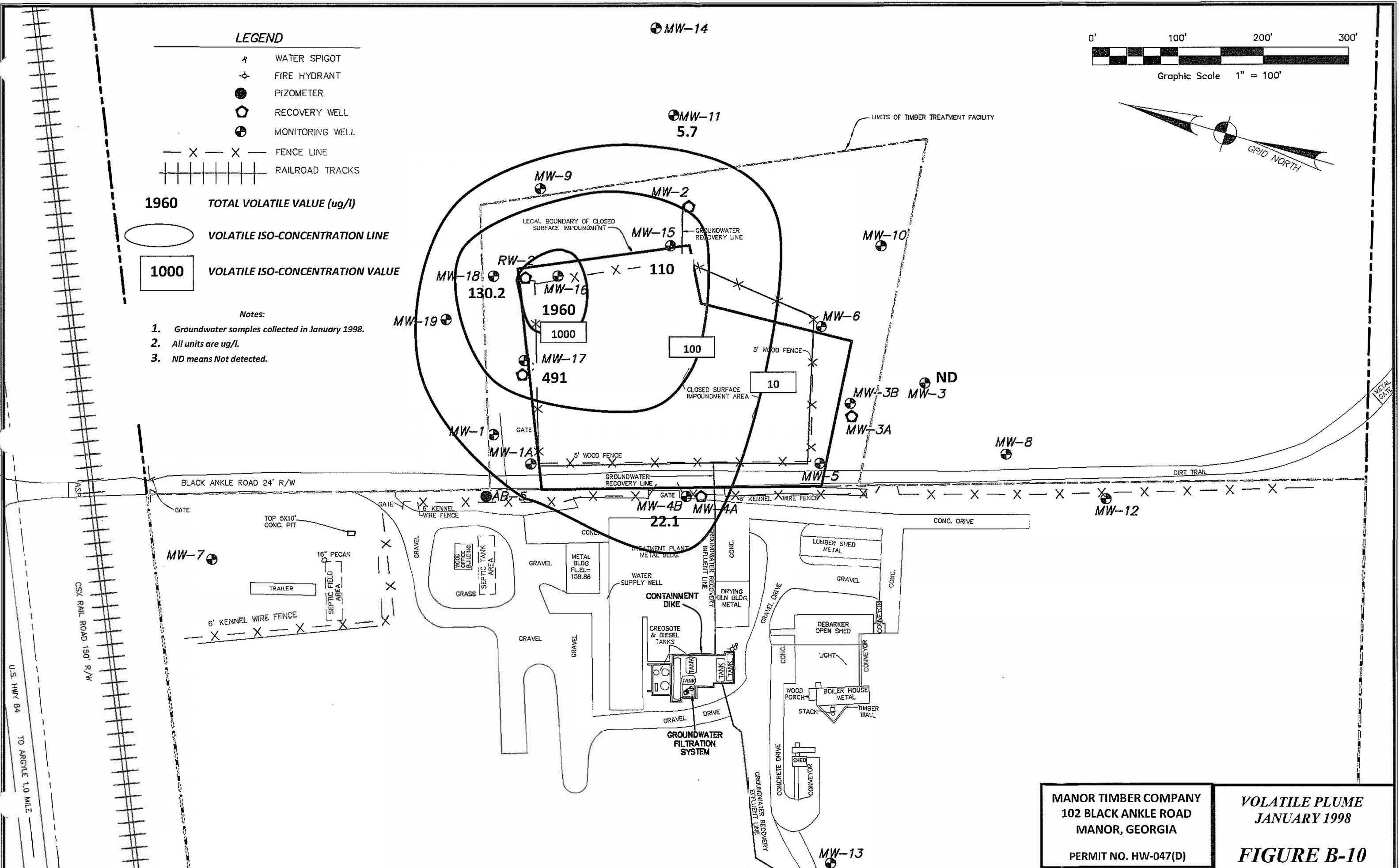
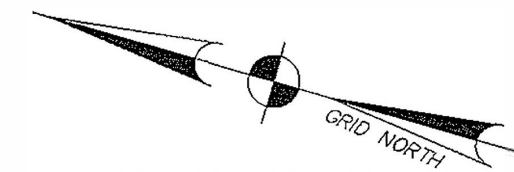
1960 TOTAL VOLATILE VALUE (ug/l)

VOLATILE ISO-CONCENTRATION LINE

1000 VOLATILE ISO-CONCENTRATION VALUE

Notes:

1. Groundwater samples collected in January 1998.
2. All units are ug/l.
3. ND means Not detected.



MANOR TIMBER COMPANY
 102 BLACK ANKLE ROAD
 MANOR, GEORGIA
 PERMIT NO. HW-047(D)

VOLATILE PLUME
 JANUARY 1998
FIGURE B-10

LEGEND

- ⊙ WATER SPIGOT
- ⊕ FIRE HYDRANT
- PIZOMETER
- ⊕ RECOVERY WELL
- ⊕ MONITORING WELL
- X - X - FENCE LINE
- ||||| RAILROAD TRACKS

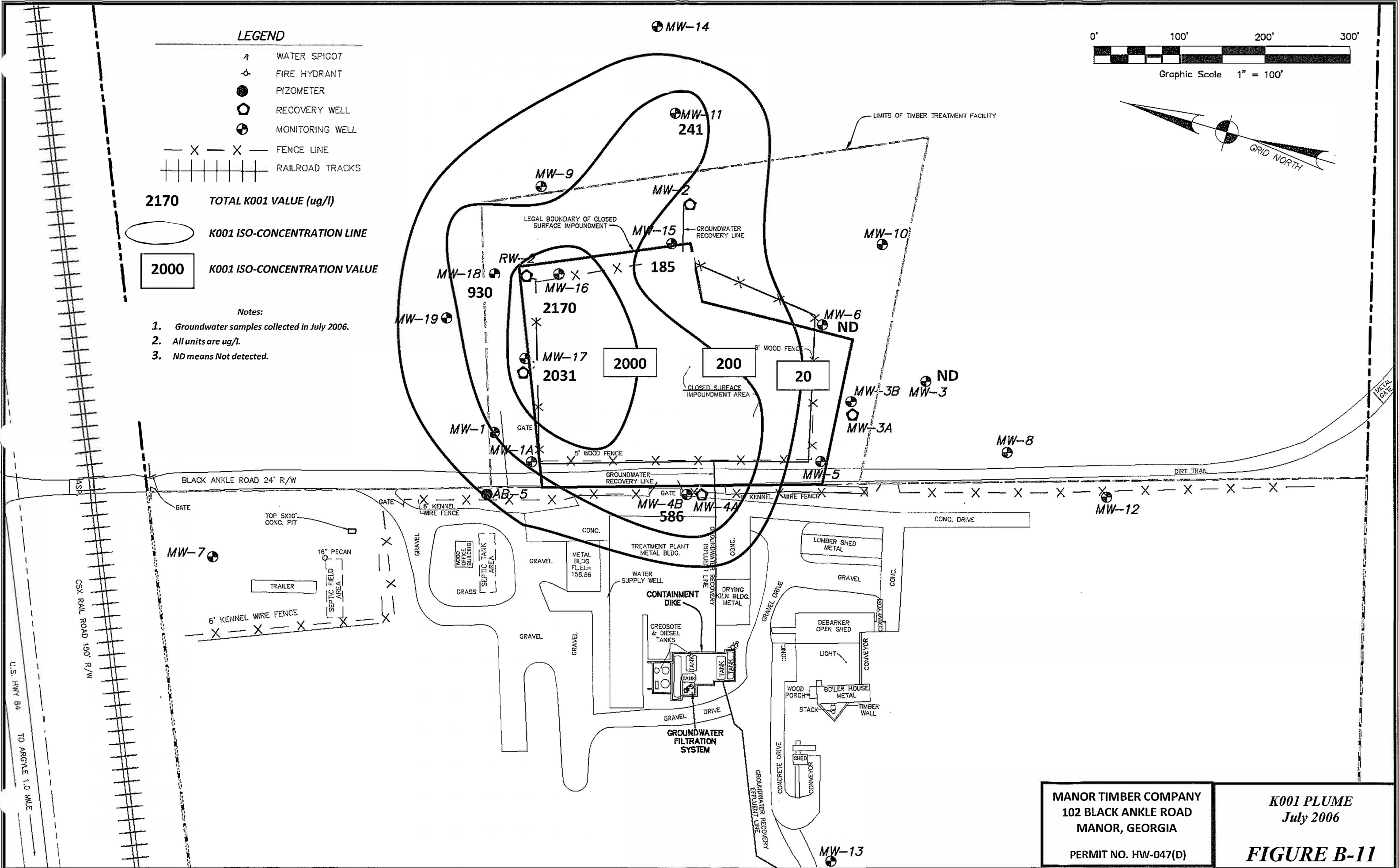
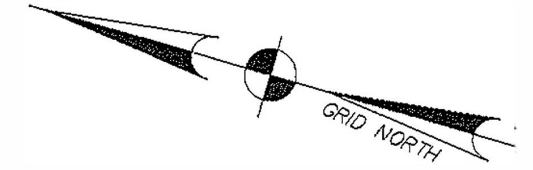
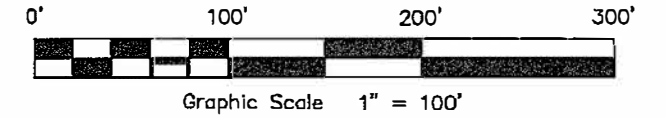
2170 TOTAL K001 VALUE (ug/l)

K001 ISO-CONCENTRATION LINE

2000 K001 ISO-CONCENTRATION VALUE

Notes:








1. Groundwater samples collected in July 2006.
2. All units are ug/l.
3. ND means Not detected.



MANOR TIMBER COMPANY
 102 BLACK ANKLE ROAD
 MANOR, GEORGIA
 PERMIT NO. HW-047(D)

K001 PLUME
 July 2006
FIGURE B-11

LEGEND

-  WATER SPIGOT
-  FIRE HYDRANT
-  PIEZOMETER
-  RECOVERY WELL
-  MONITORING WELL
-  FENCE LINE
-  RAILROAD TRACKS

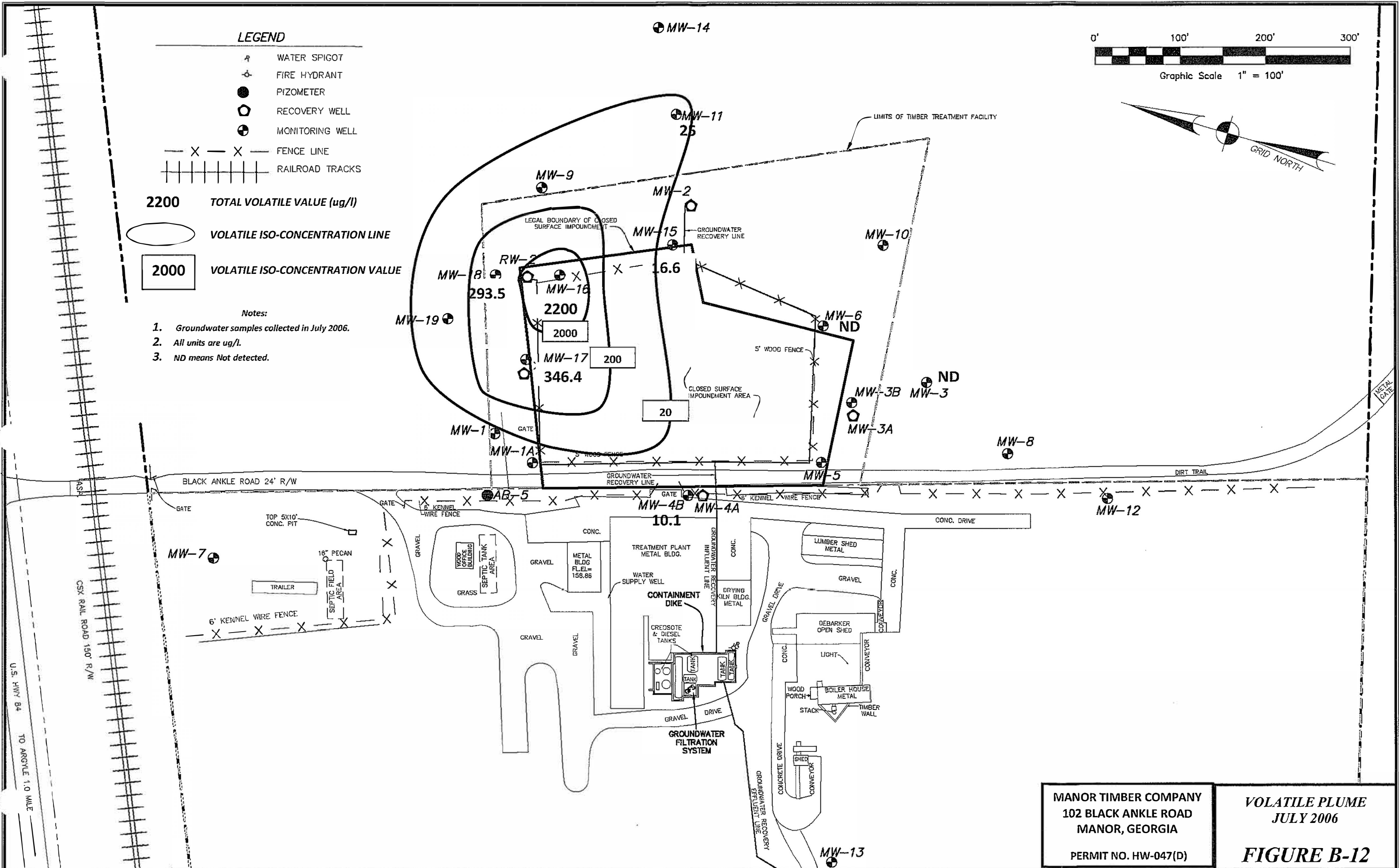
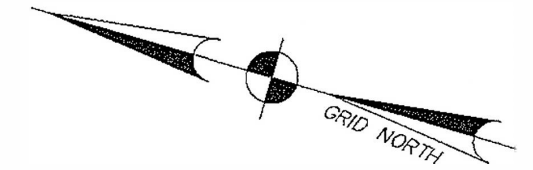
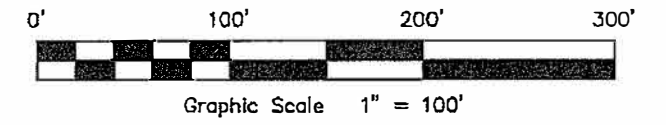
2200 TOTAL VOLATILE VALUE (ug/l)

 VOLATILE ISO-CONCENTRATION LINE

2000 VOLATILE ISO-CONCENTRATION VALUE

Notes:

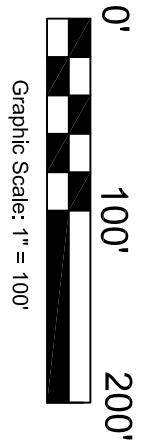
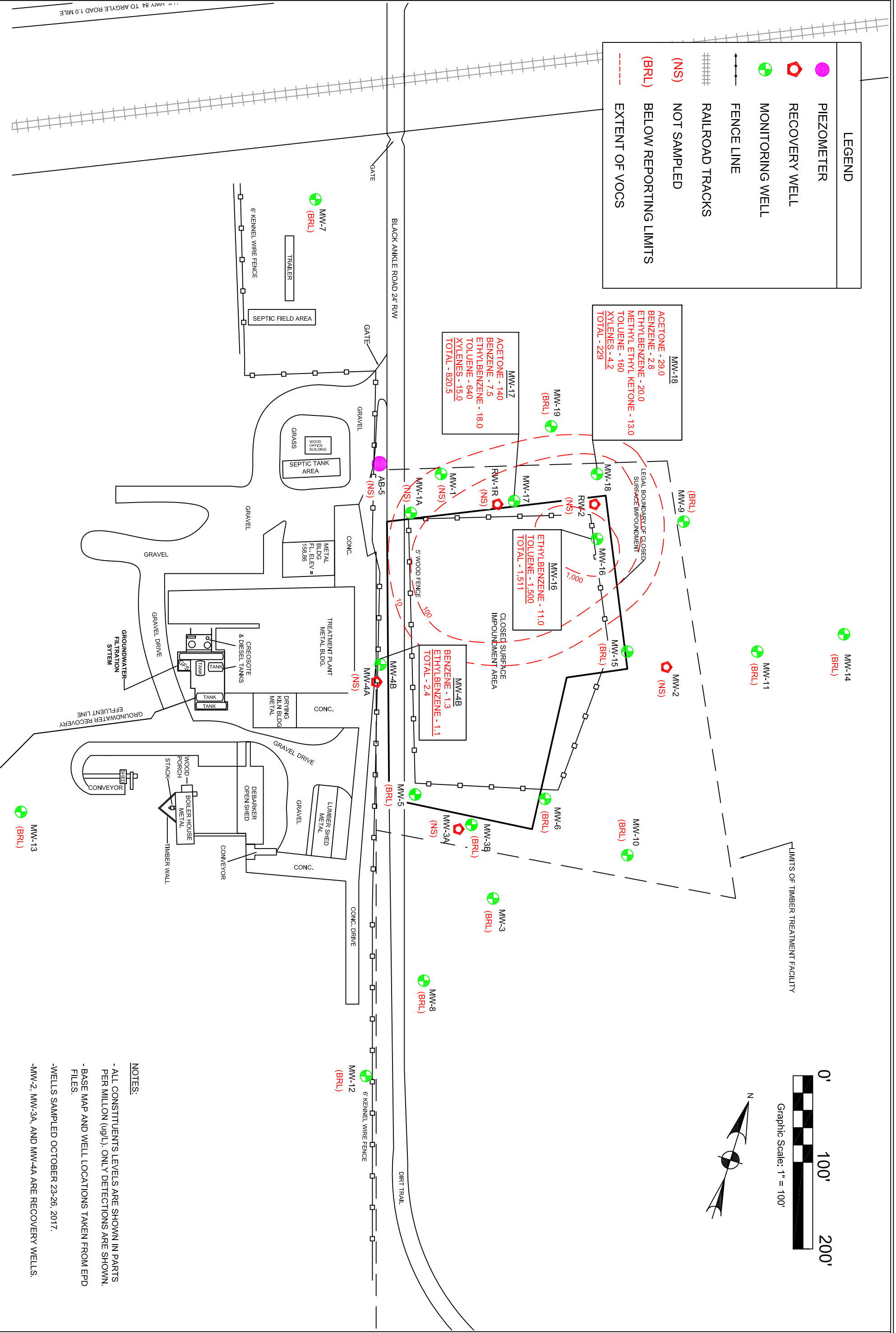
1. Groundwater samples collected in July 2006.
2. All units are ug/l.
3. ND means Not detected.



MANOR TIMBER COMPANY
 102 BLACK ANKLE ROAD
 MANOR, GEORGIA
 PERMIT NO. HW-047(D)

VOLATILE PLUME
 JULY 2006
FIGURE B-12

LEGEND	
	PIEZOMETER
	RECOVERY WELL
	MONITORING WELL
	FENCE LINE
	RAILROAD TRACKS
(NS)	NOT SAMPLED
(BRL)	BELOW REPORTING LIMITS
	EXTENT OF VOCs



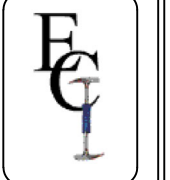
- NOTES:**
- ALL CONSTITUENTS LEVELS ARE SHOWN IN PARTS PER MILLION (ug/L). ONLY DETECTIONS ARE SHOWN.
 - BASE MAP AND WELL LOCATIONS TAKEN FROM EPD FILES.
 - WELLS SAMPLED OCTOBER 23-26, 2017.
 - MW-2, MW-3A, AND MW-4A ARE RECOVERY WELLS.

FIGURE NO
B13

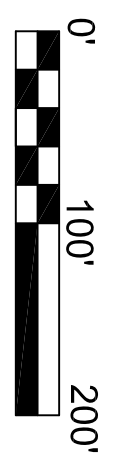
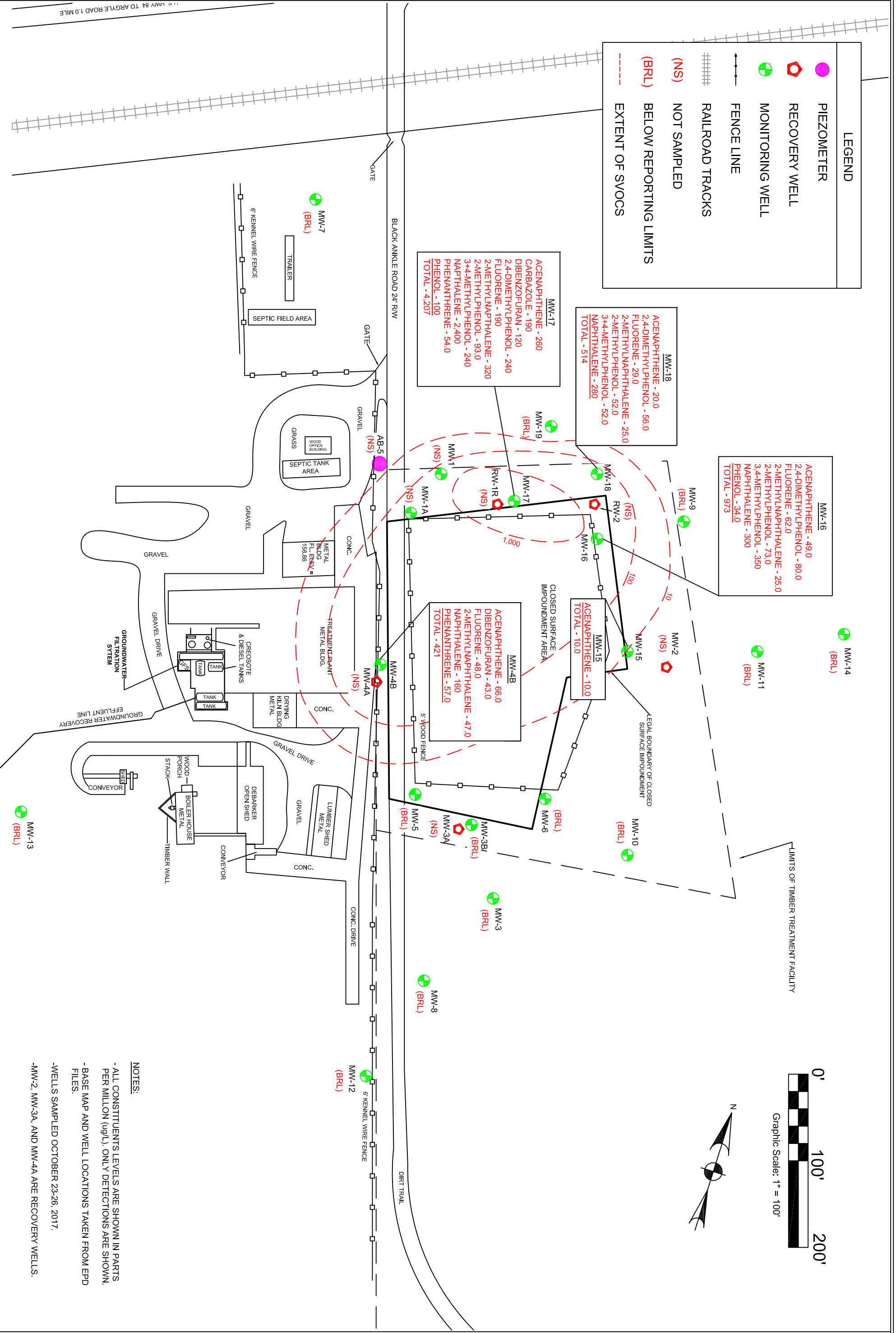
MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA

HORIZONTAL EXTENT OF VOCs (OCTOBER 2017)

ENVIRORISK
CONSULTANTS, INC.



LEGEND	
	PIEZOMETER
	RECOVERY WELL
	MONITORING WELL
	FENCE LINE
	RAILROAD TRACKS
(NS)	NOT SAMPLED
(BRL)	BELOW REPORTING LIMITS
---	EXTENT OF SVOCs



NOTES:

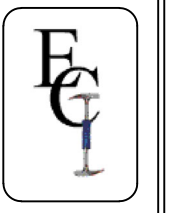
- ALL CONSTITUENTS LEVELS ARE SHOWN IN PARTS PER MILLION (ug/L). ONLY DETECTIONS ARE SHOWN.
- BASE MAP AND WELL LOCATIONS TAKEN FROM EPD FILES.
- WELLS SAMPLED OCTOBER 23-26, 2017.
- MW-2, MW-3A, AND MW-4A ARE RECOVERY WELLS.







FIGURE NO
B14

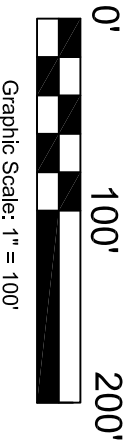
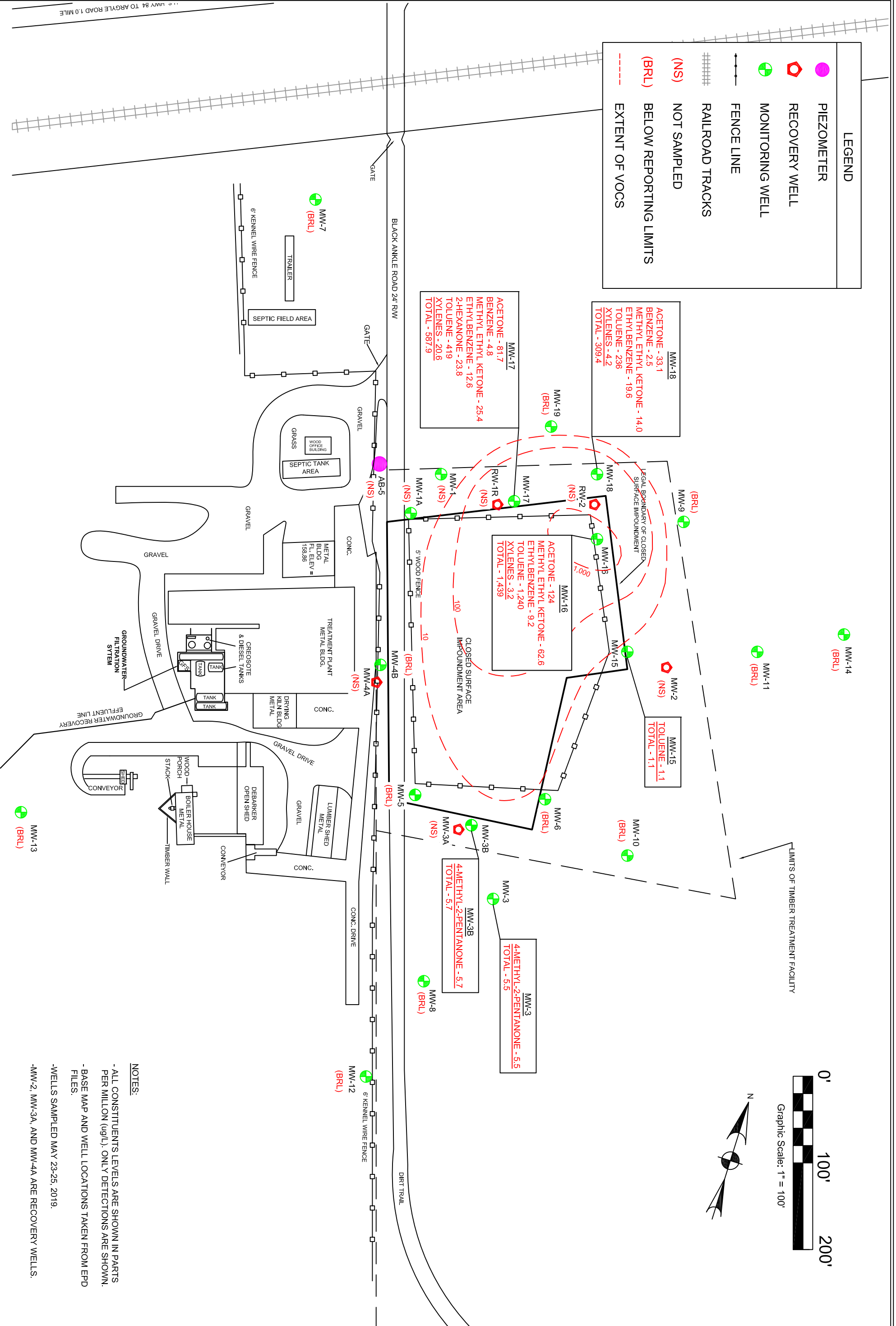
MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA

HORIZONTAL EXTENT OF SVOCs (OCTOBER 2017)

ENVIRORISK
CONSULTANTS, INC.



LEGEND	
	PIEZOMETER
	RECOVERY WELL
	MONITORING WELL
	FENCE LINE
	RAILROAD TRACKS
(NS)	NOT SAMPLED
(BRL)	BELOW REPORTING LIMITS
	EXTENT OF VOCs



NOTES:

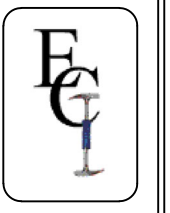
- ALL CONSTITUENTS LEVELS ARE SHOWN IN PARTS PER MILLION (ug/L). ONLY DETECTIONS ARE SHOWN.
- BASE MAP AND WELL LOCATIONS TAKEN FROM EPD FILES.
- WELLS SAMPLED MAY 23-25, 2019.
- MW-2, MW-3A, AND MW-4A ARE RECOVERY WELLS.






FIGURE NO
B15

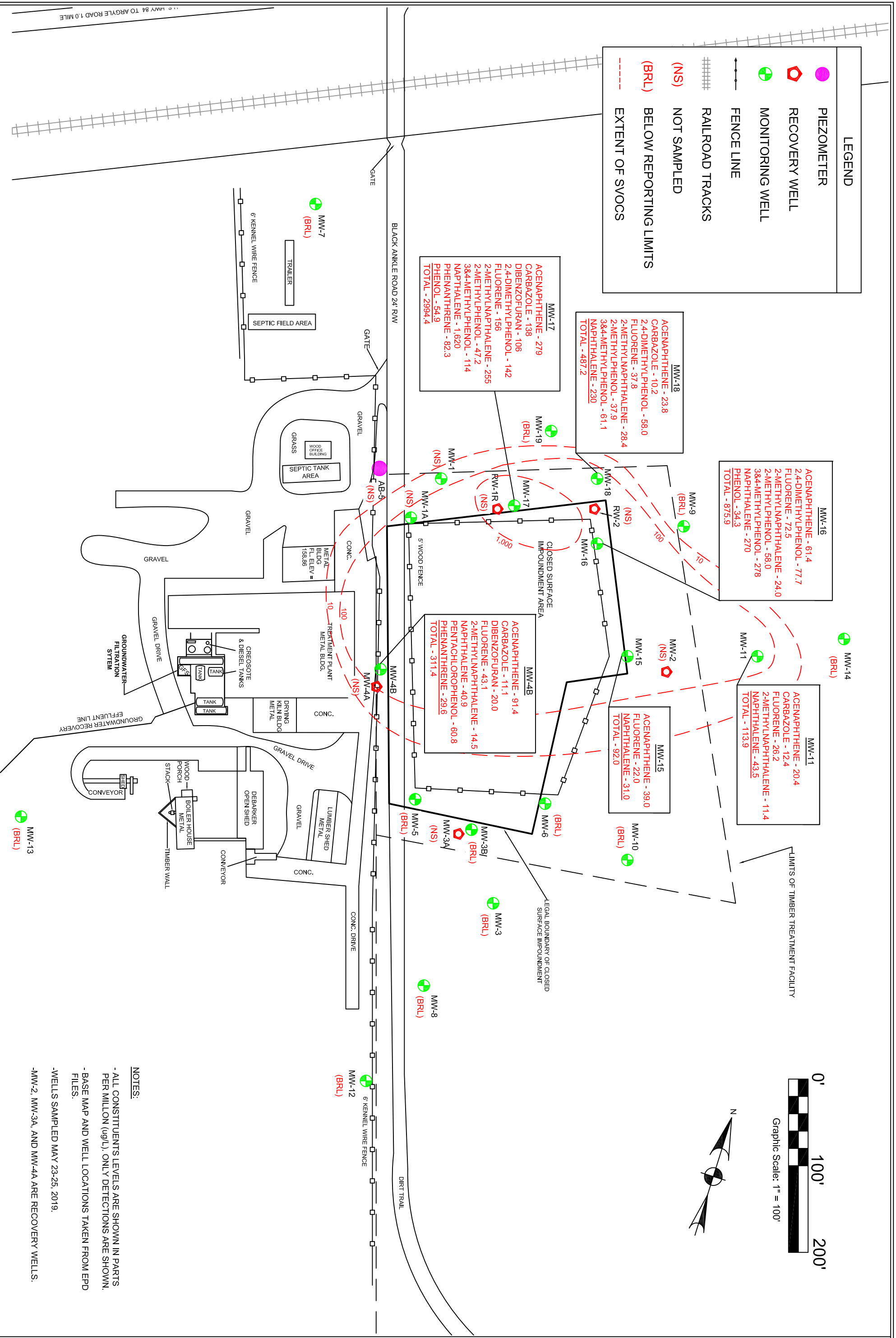
MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA

HORIZONTAL EXTENT OF VOCs (MAY 2019)

ENVIRORISK
CONSULTANTS, INC.



LEGEND	
	PIEZOMETER
	RECOVERY WELL
	MONITORING WELL
	FENCE LINE
	RAILROAD TRACKS
(NS)	NOT SAMPLED
(BRL)	BELOW REPORTING LIMITS
---	EXTENT OF SVOCs



MW-17
 ACENAPHTHENE - 279
 CARBAZOLE - 138
 DIBENZOFURAN - 106
 2,4-DIMETHYLPHENOL - 142
 FLUORENE - 156
 2-METHYLNAPHTHALENE - 295
 2-METHYLPHENOL - 47.2
 3&4-METHYLPHENOL - 114
 NAPHTHALENE - 1,620
 PHENANTHRENE - 82.3
 TOTAL - 2994.4

MW-18
 ACENAPHTHENE - 23.8
 CARBAZOLE - 10.2
 2,4-DIMETHYLPHENOL - 58.0
 FLUORENE - 37.8
 2-METHYLNAPHTHALENE - 28.4
 2-METHYLPHENOL - 37.9
 3&4-METHYLPHENOL - 61.1
 NAPHTHALENE - 230
 TOTAL - 487.2

MW-16
 ACENAPHTHENE - 61.4
 2,4-DIMETHYLPHENOL - 77.7
 FLUORENE - 72.5
 2-METHYLNAPHTHALENE - 24.0
 2-METHYLPHENOL - 58.0
 3&4-METHYLPHENOL - 278
 NAPHTHALENE - 270
 PHENOL - 34.3
 TOTAL - 875.9

MW-11
 ACENAPHTHENE - 20.4
 CARBAZOLE - 12.4
 FLUORENE - 26.2
 2-METHYLNAPHTHALENE - 11.4
 NAPHTHALENE - 43.5
 TOTAL - 113.9

MW-4B
 ACENAPHTHENE - 91.4
 CARBAZOLE - 11.1
 DIBENZOFURAN - 20.0
 FLUORENE - 43.1
 2-METHYLNAPHTHALENE - 14.5
 NAPHTHALENE - 40.9
 PENTACHLOROPHENOL - 60.8
 PHENANTHRENE - 29.6
 TOTAL - 317.4

MW-15
 ACENAPHTHENE - 39.0
 FLUORENE - 22.0
 NAPHTHALENE - 31.0
 TOTAL - 92.0

MW-3B/
 (BRL)

MW-3A/
 (NS)

MW-3
 (BRL)

- NOTES:**
- ALL CONSTITUENTS LEVELS ARE SHOWN IN PARTS PER MILLION (ug/L). ONLY DETECTIONS ARE SHOWN.
 - BASE MAP AND WELL LOCATIONS TAKEN FROM EPD FILES.
 - WELLS SAMPLED MAY 23-25, 2019.
 - MW-2, MW-3A, AND MW-4A ARE RECOVERY WELLS.



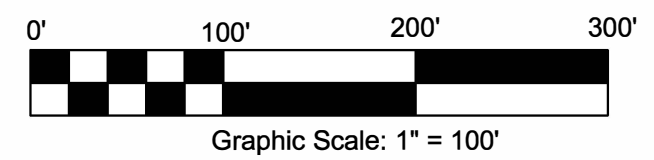
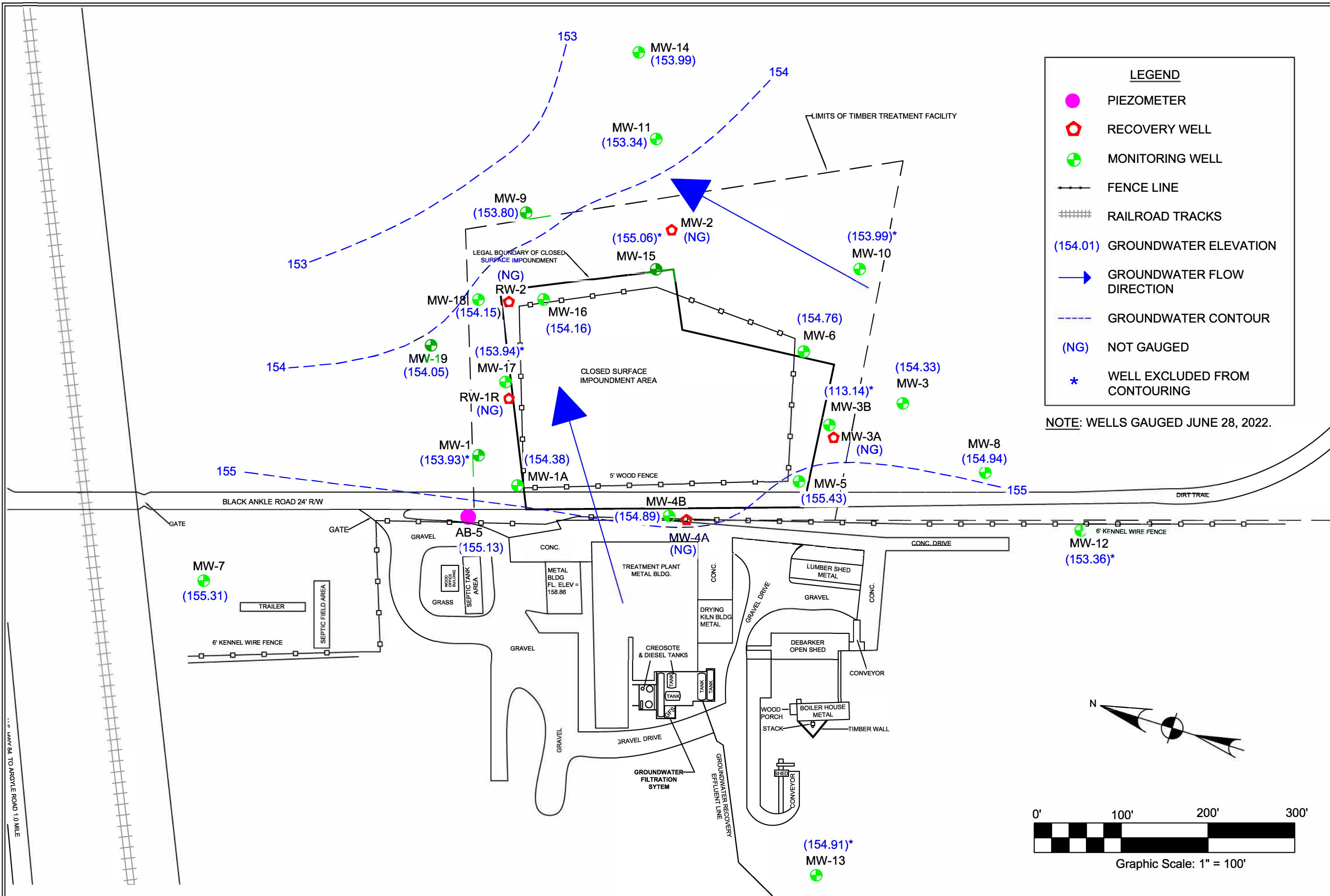
ENVIORISK
CONSULTANTS, INC.

MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA







POTENTIOMETRIC SURFACE MAP (6/28/2022)

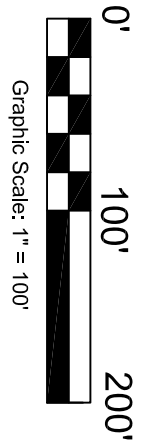
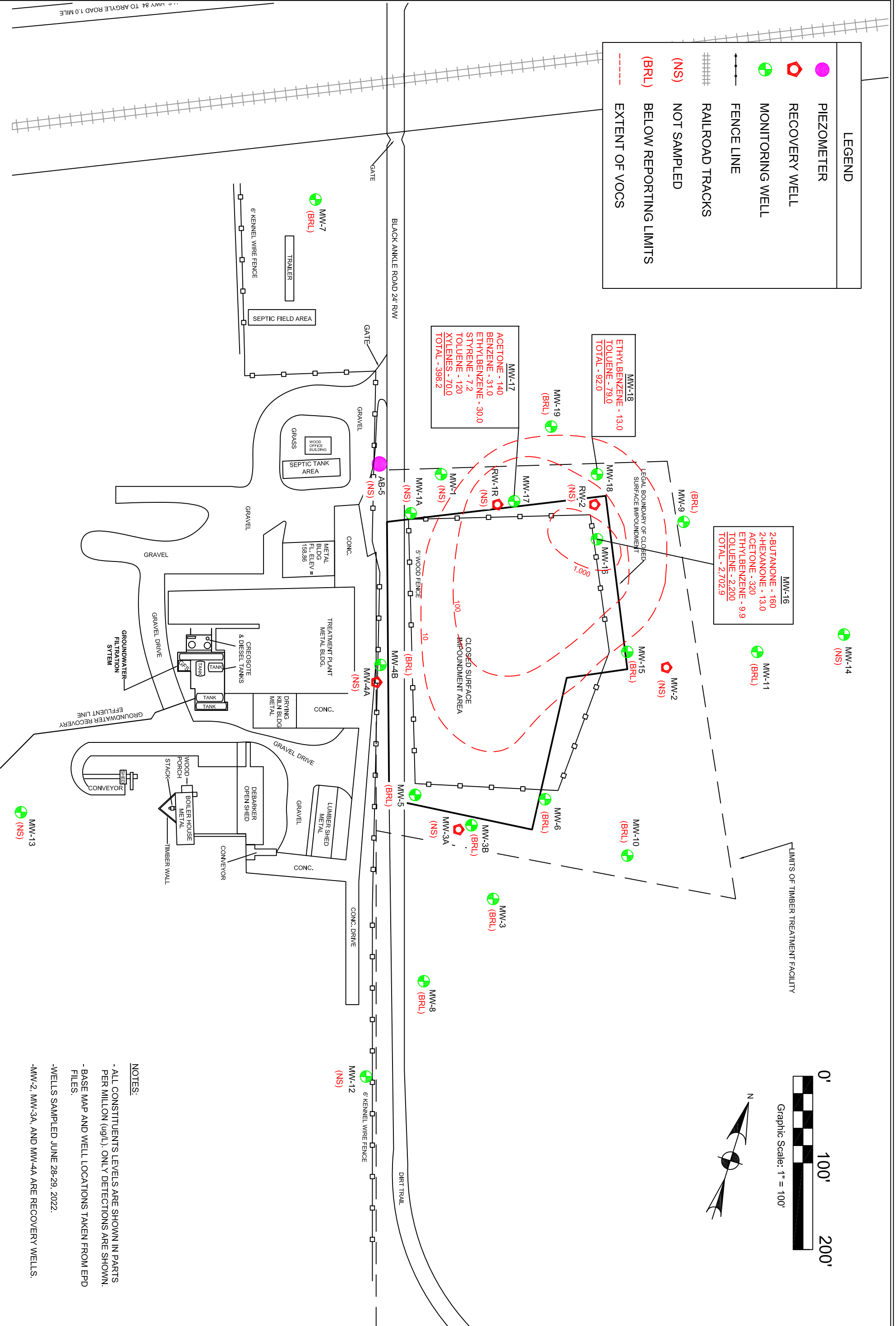
FIGURE NO

B17



1.0 MILE TO ARGYLE ROAD 1.0 MILE

LEGEND	
	PIEZOMETER
	RECOVERY WELL
	MONITORING WELL
	FENCE LINE
	RAILROAD TRACKS
(NS)	NOT SAMPLED
(BRL)	BELOW REPORTING LIMITS
	EXTENT OF VOCs



NOTES:

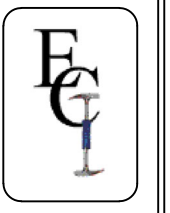
- ALL CONSTITUENTS LEVELS ARE SHOWN IN PARTS PER MILLION (ug/L). ONLY DETECTIONS ARE SHOWN.
- BASE MAP AND WELL LOCATIONS TAKEN FROM EPD FILES.
- WELLS SAMPLED JUNE 28-29, 2022.
- MW-2, MW-3A, AND MW-4A ARE RECOVERY WELLS.

FIGURE NO
B18

**MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA**

HORIZONTAL EXTENT OF VOCs (JUNE 2022)

**ENVIRORISK
CONSULTANTS, INC.**



LEGEND	
	PIEZOMETER
	RECOVERY WELL
	MONITORING WELL
	FENCE LINE
	RAILROAD TRACKS
(NS)	NOT SAMPLED
(BRL)	BELOW REPORTING LIMITS
	EXTENT OF SVOCs

MW-17
 2,3,4,6-TETRACHLOROPHENOL - 110
 2,4,5-TRICHLOROPHENOL - 52.0
 2,4-DIMETHYLNAPHTHALENE - 300
 2-METHYLNAPHTHALENE - 530
 3,4-METHYLNAPHTHALENE - 160
 4-METHYLNAPHTHALENE - 450
 ACENAPHTHENE - 450
 ACENAPHTHENE - 400
 ACENAPHTHYLENE - 11.0
 ACETOPHENONE - 73.0
 CARBAZOLE - 400
 DIBENZOFURAN - 240
 FLUORENE - 240
 NAPHTHALENE - 5,200
 PENTACHLOROPHENOL - 240
 PHENANTHRENE - 140
 PHENOL - 140
TOTAL - 9,011.0

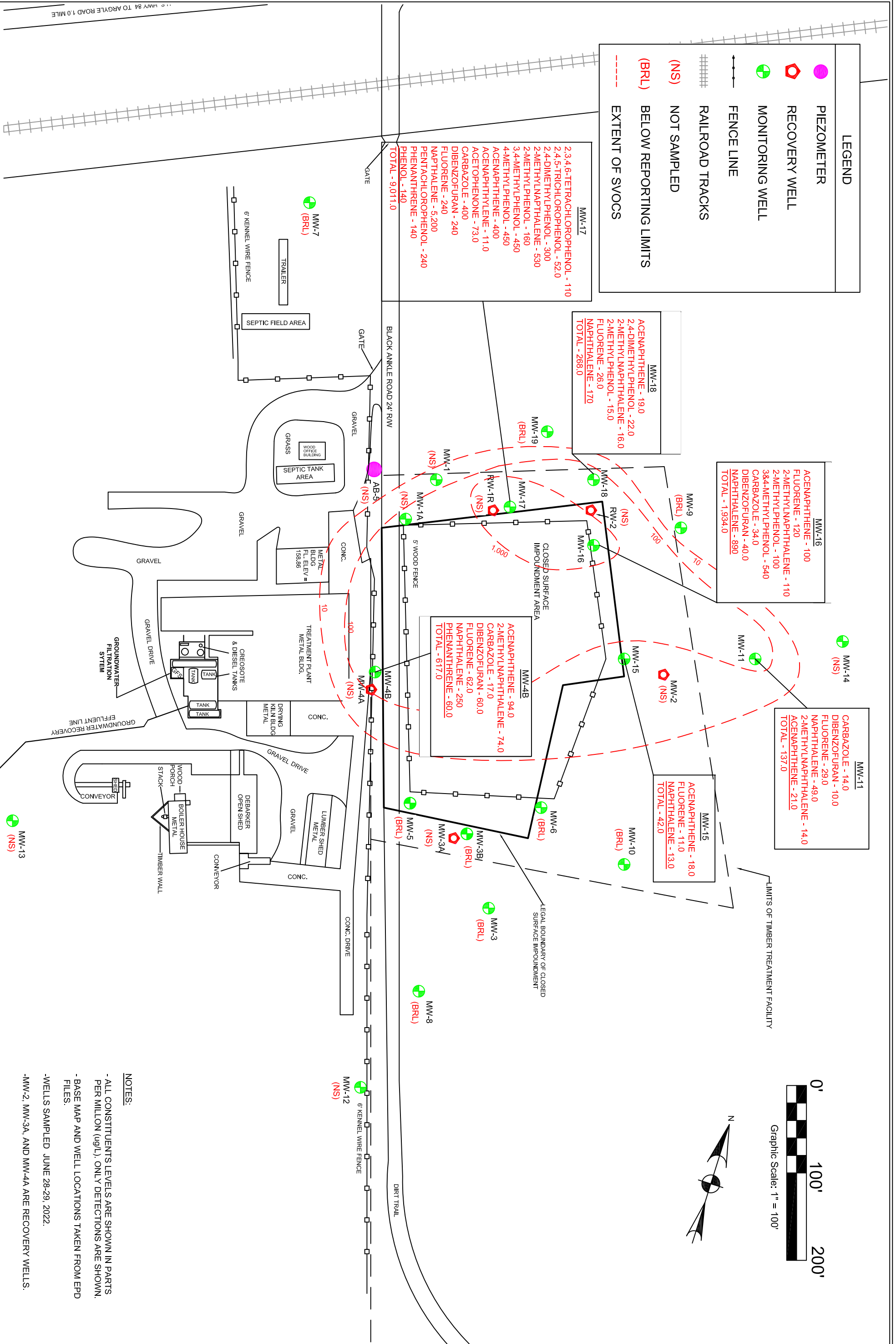
MW-18
 ACENAPHTHENE - 19.0
 2,4-DIMETHYLNAPHTHALENE - 22.0
 2-METHYLNAPHTHALENE - 16.0
 FLUORENE - 26.0
 NAPHTHALENE - 170
TOTAL - 268.0

MW-16
 ACENAPHTHENE - 100
 FLUORENE - 120
 2-METHYLNAPHTHALENE - 110
 2-METHYLNAPHTHALENE - 100
 3,4-METHYLNAPHTHALENE - 540
 CARBAZOLE - 34.0
 DIBENZOFURAN - 40.0
 NAPHTHALENE - 890
TOTAL - 1,934.0

MW-11
 CARBAZOLE - 14.0
 DIBENZOFURAN - 10.0
 FLUORENE - 29.0
 NAPHTHALENE - 49.0
 2-METHYLNAPHTHALENE - 14.0
 ACENAPHTHENE - 21.0
TOTAL - 137.0

MW-15
 ACENAPHTHENE - 18.0
 FLUORENE - 11.0
 NAPHTHALENE - 13.0
TOTAL - 42.0

MW-4B
 ACENAPHTHENE - 94.0
 2-METHYLNAPHTHALENE - 74.0
 CARBAZOLE - 17.0
 DIBENZOFURAN - 60.0
 FLUORENE - 62.0
 NAPHTHALENE - 250
 PHENANTHRENE - 60.0
TOTAL - 617.0

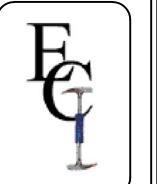


NOTES:
 - ALL CONSTITUENTS LEVELS ARE SHOWN IN PARTS PER MILLION (ug/L). ONLY DETECTIONS ARE SHOWN.
 - BASE MAP AND WELL LOCATIONS TAKEN FROM EPD FILES.
 - WELLS SAMPLED JUNE 28-29, 2022.
 - MW-2, MW-3A, AND MW-4A ARE RECOVERY WELLS.

FIGURE NO
B19

MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD
MANOR, GEORGIA
HORIZONTAL EXTENT OF SVOCs (JUNE 2022)

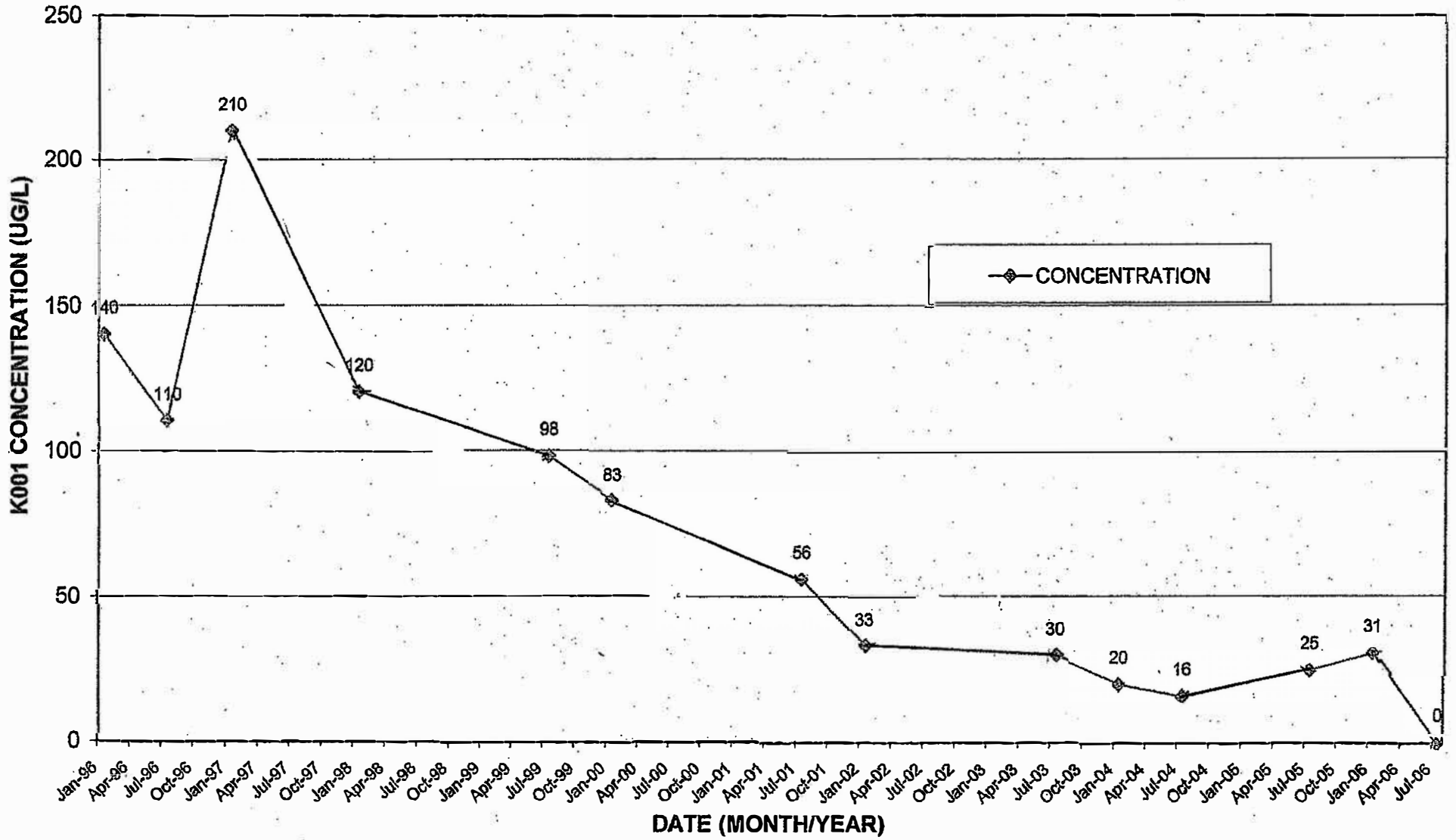
ENVIRORISK
CONSULTANTS, INC.



MANOR TIMBER COMPANY

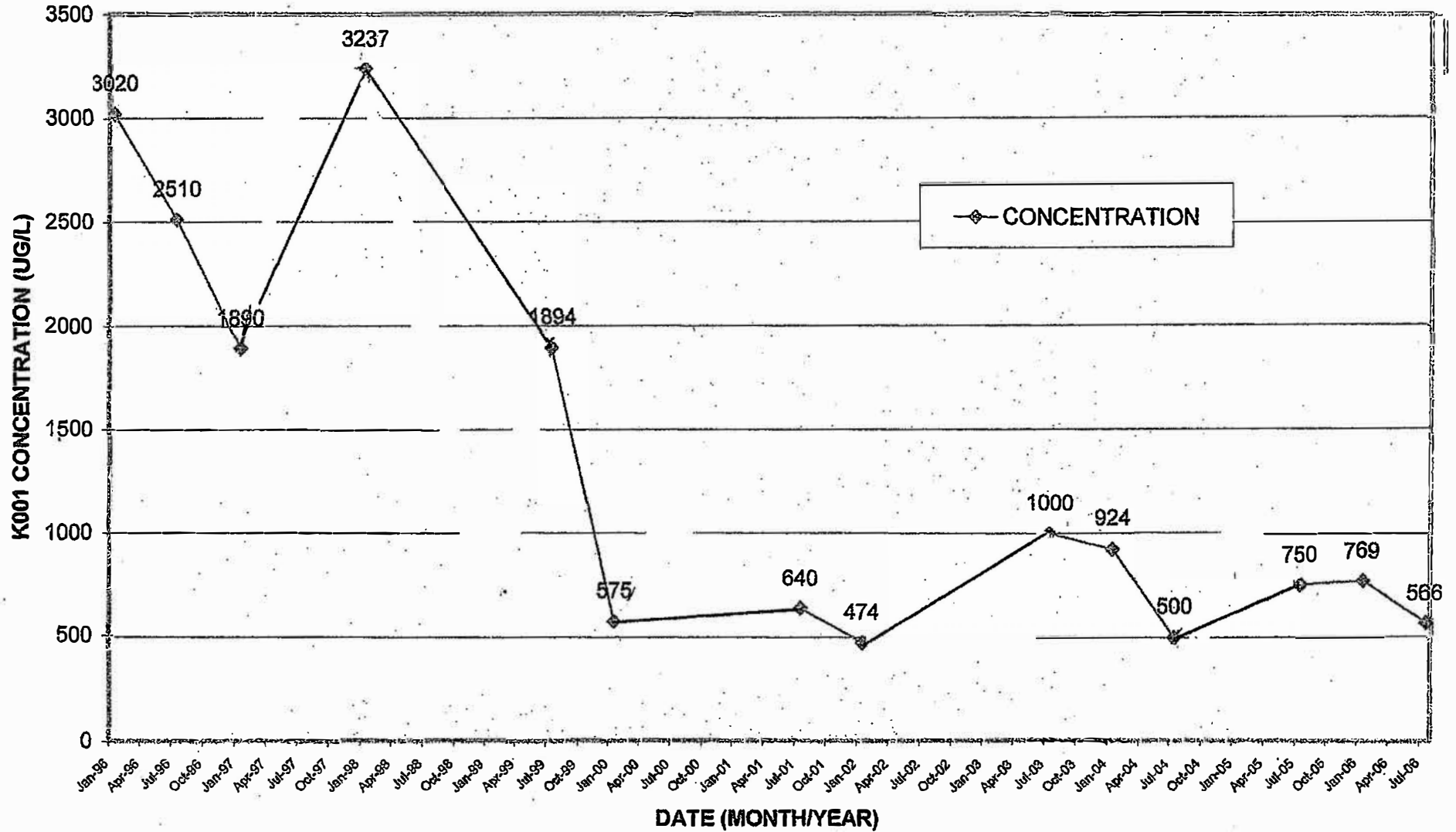
GRAPH 1

KO01 CONCENTRATIONS (UG/L) VS. TIME (MONTH/YEAR)
MW-3 (JANUARY 1996 THROUGH JULY 2006)



MANOR TIMBER COMPANY

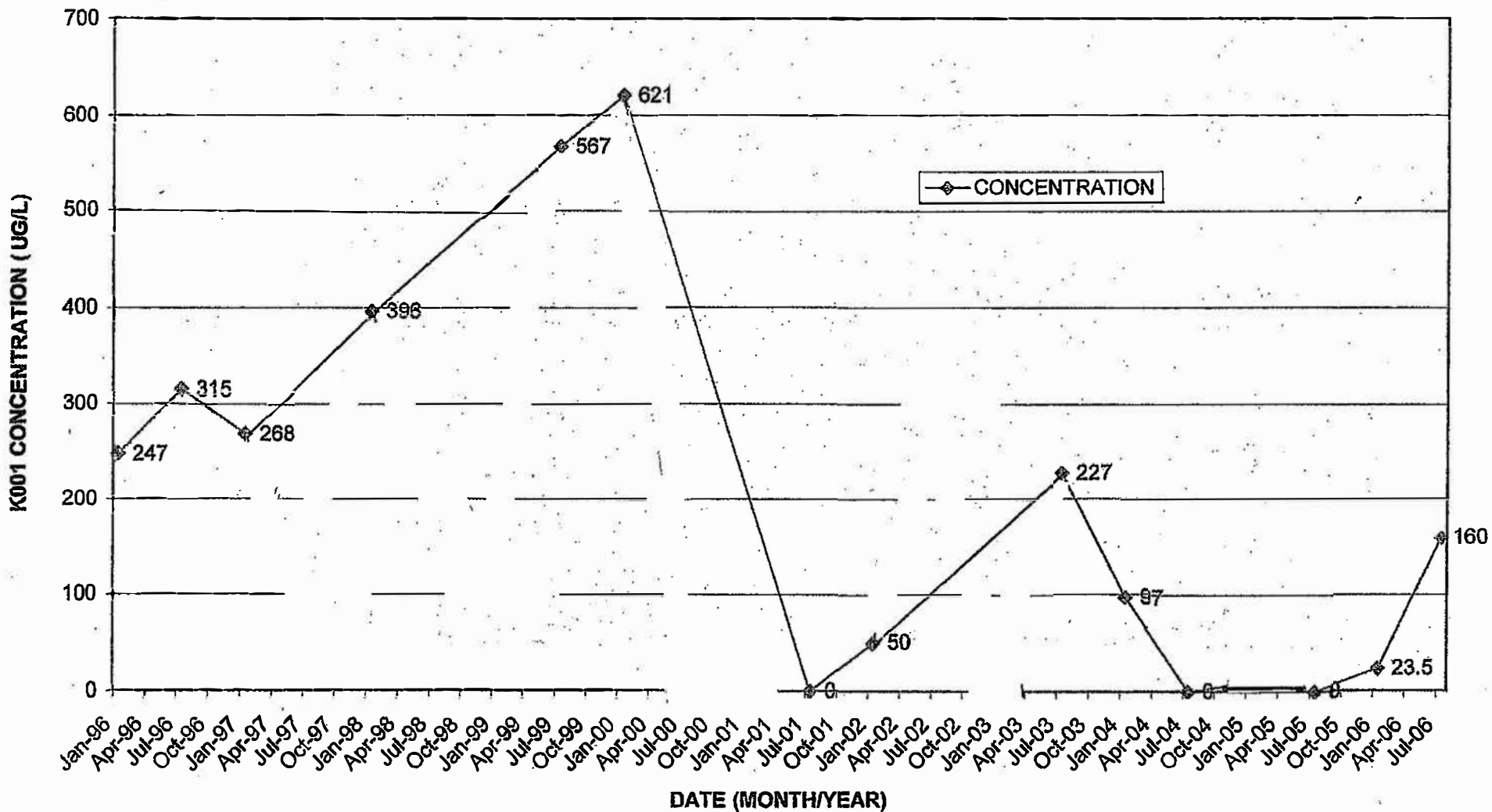
GRAPH 2
K001 CONCENTRATIONS (UG/L) VS. TIME (MONTH/YEAR)
MW-4B (JUNE 1996 THROUGH JULY 2006)



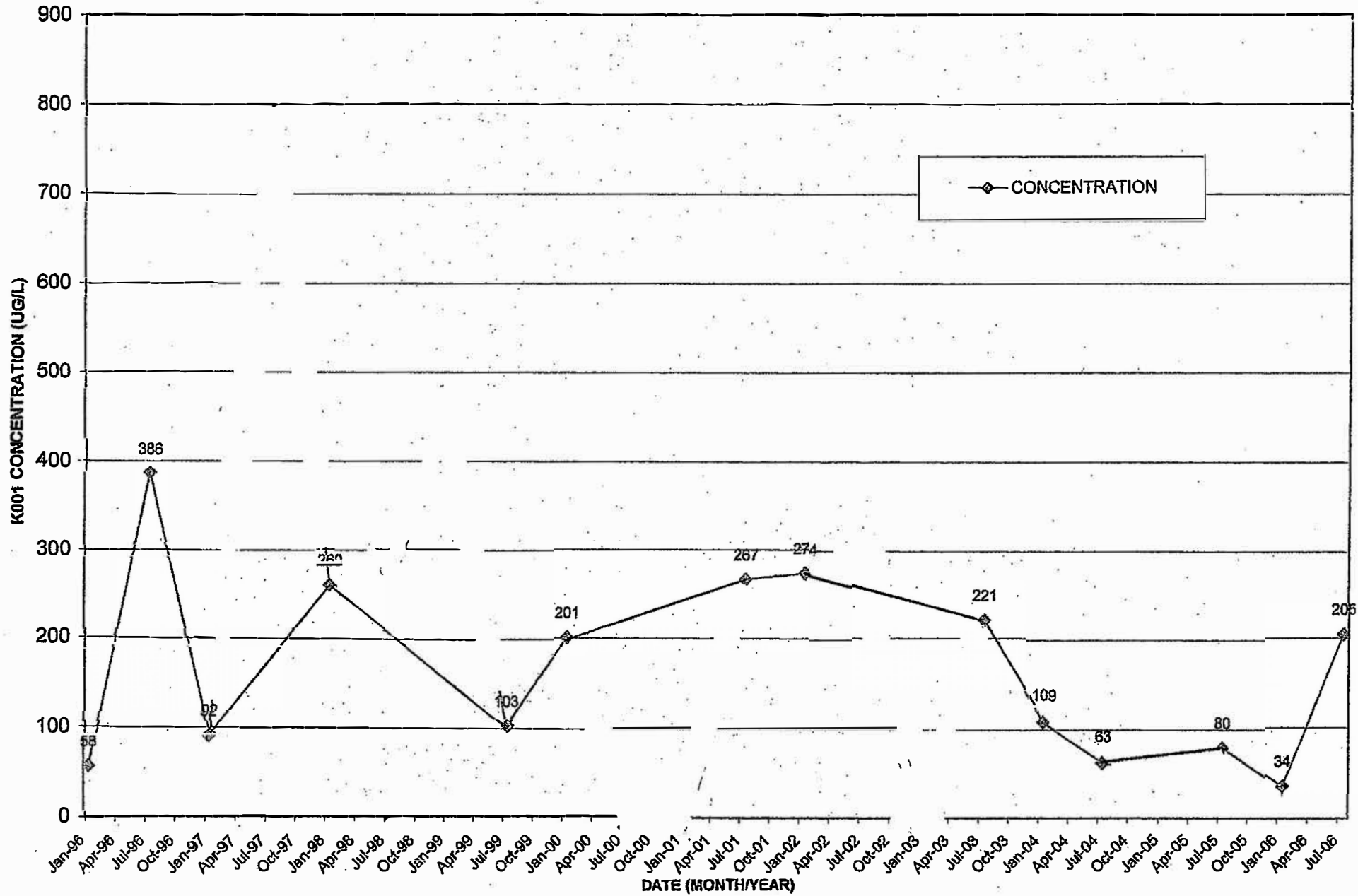
MANOR TIMBER COMPANY

GRAPH 3

K001 CONCENTRATIONS (UG/L) VS. TIME (MONTH/YEAR)
MW-11 (JANUARY 1996 THROUGH JULY 2006)



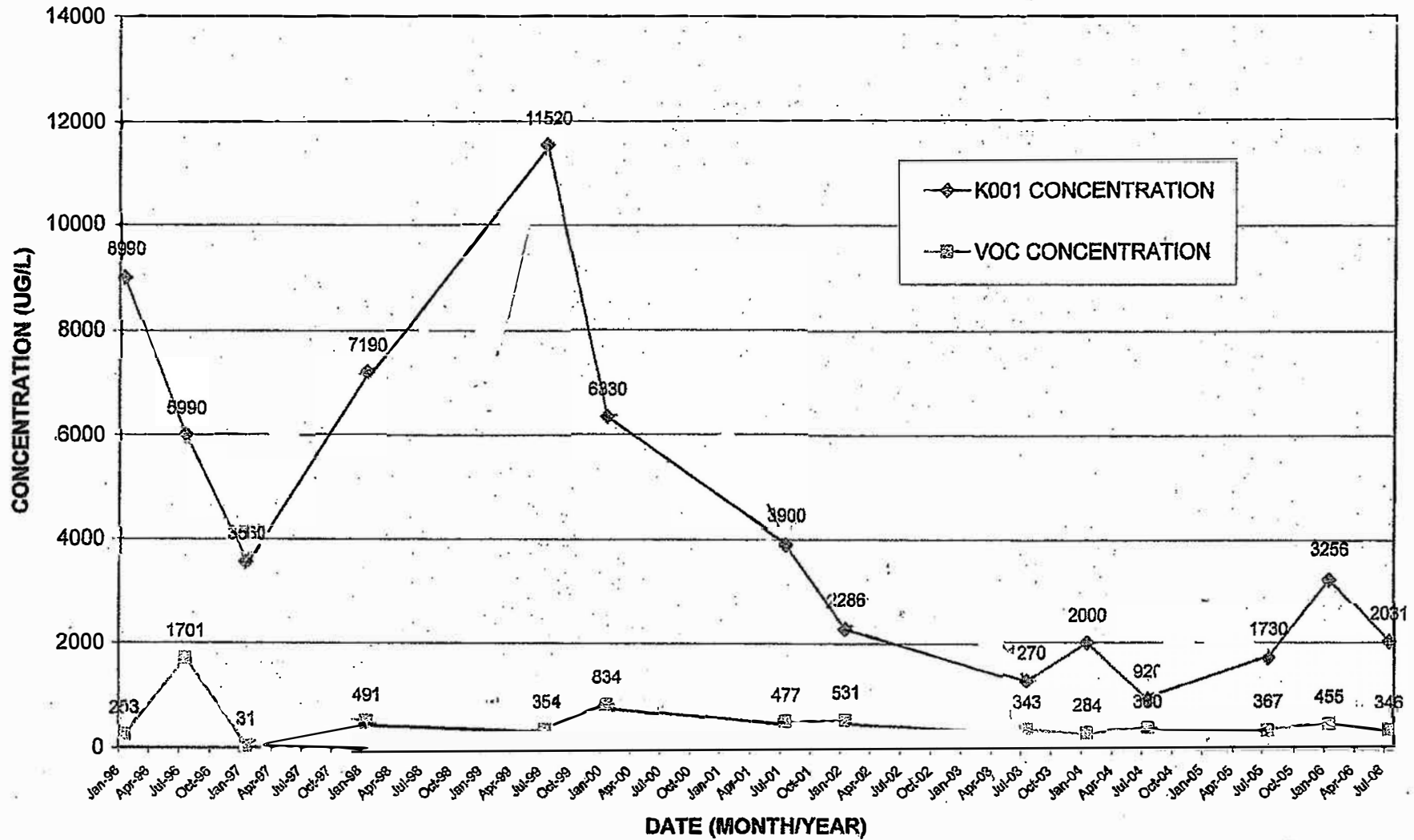
GRAPH 4
K001 CONCENTRATIONS (UG/L) VS. TIME (MONTH/YEAR)
MW-15 (JANUARY 1996 THROUGH JULY 2006)



MANOR TIMBER COMPANY

GRAPH 5

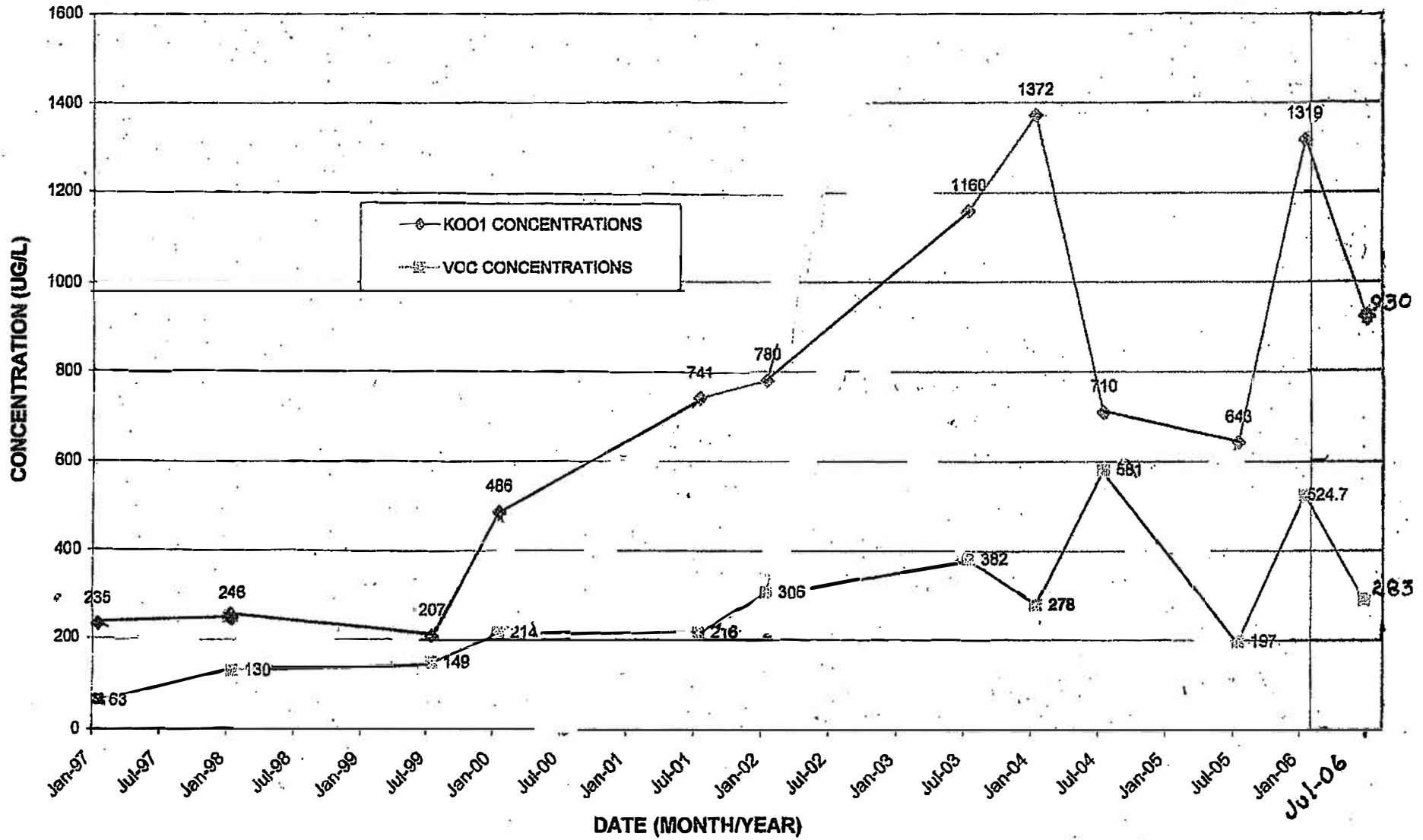
KOO1 AND VOC CONCENTRATIONS (UG/L) VS. TIME (MONTH/YEAR)
MW-17 (JANUARY 1996 THROUGH JULY 2006)



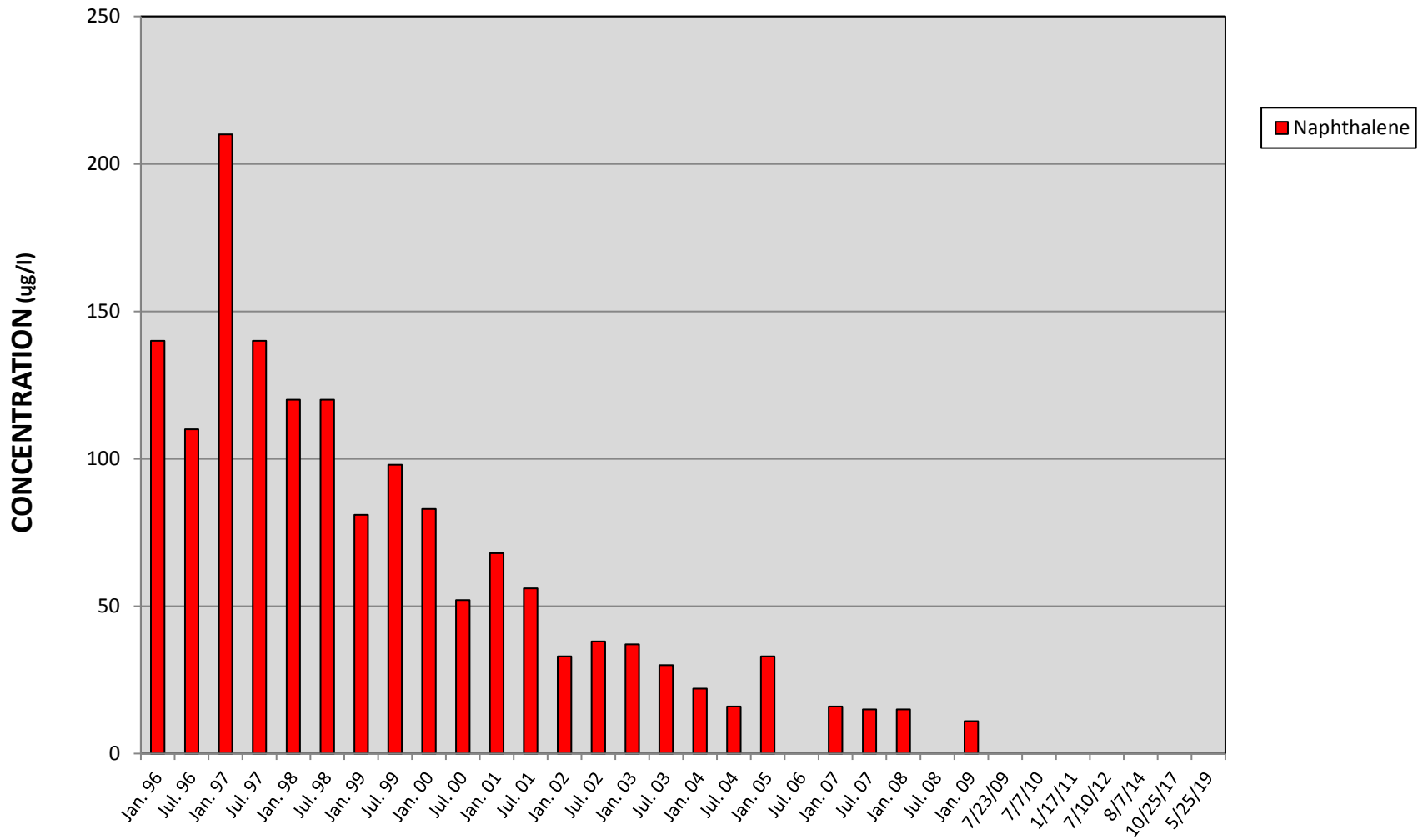
MANOR TIMBER COMPANY

GRAPH 6

K001/VOC CONCENTRATIONS (UG/L) VS. TIME (MONTH/YEAR)
MW18 (JANUARY 1997 THROUGH JANUARY 2006)

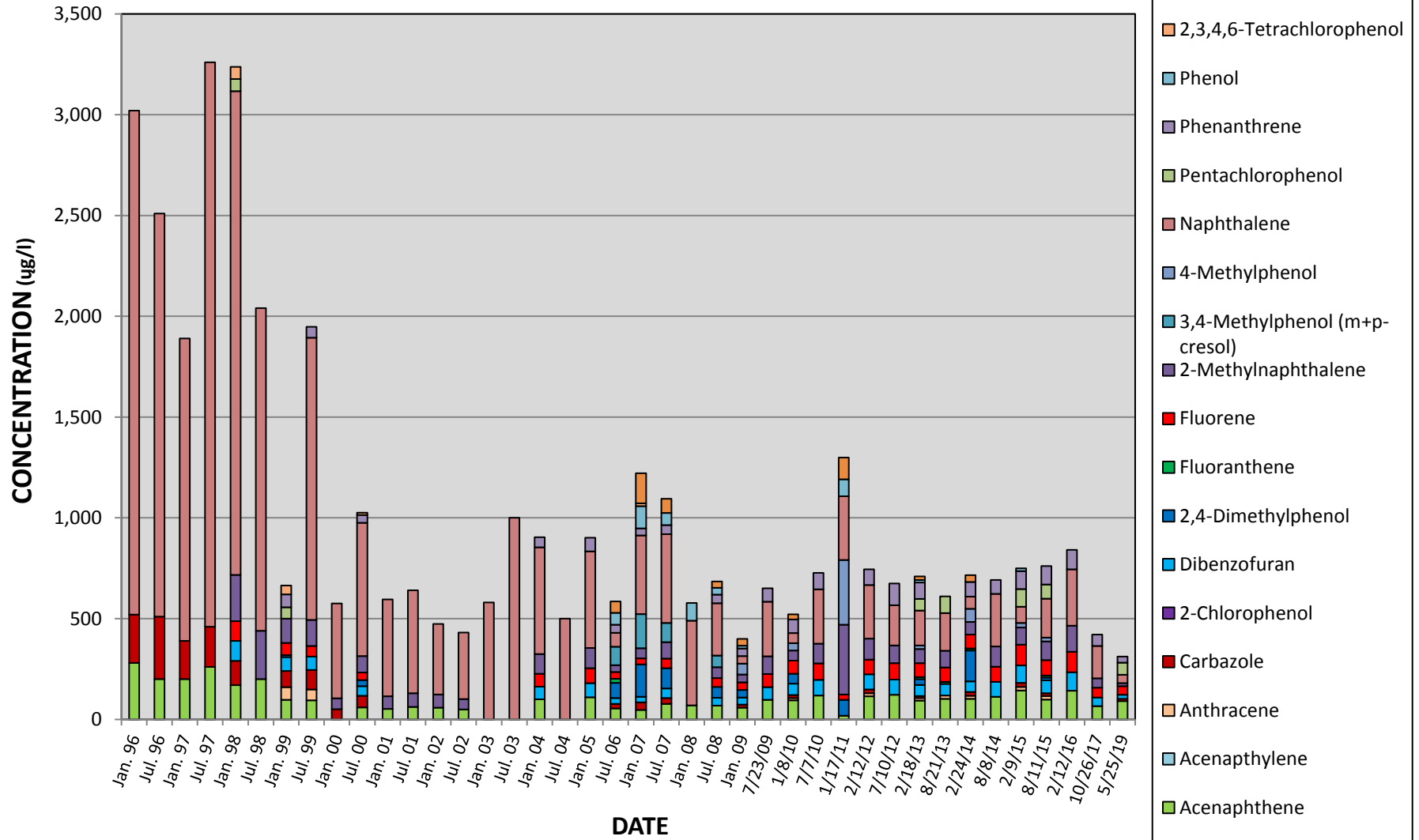


MANOR TIMBER SVOC CONCENTRATIONS VS. TIME GRAPH 7. MW-3



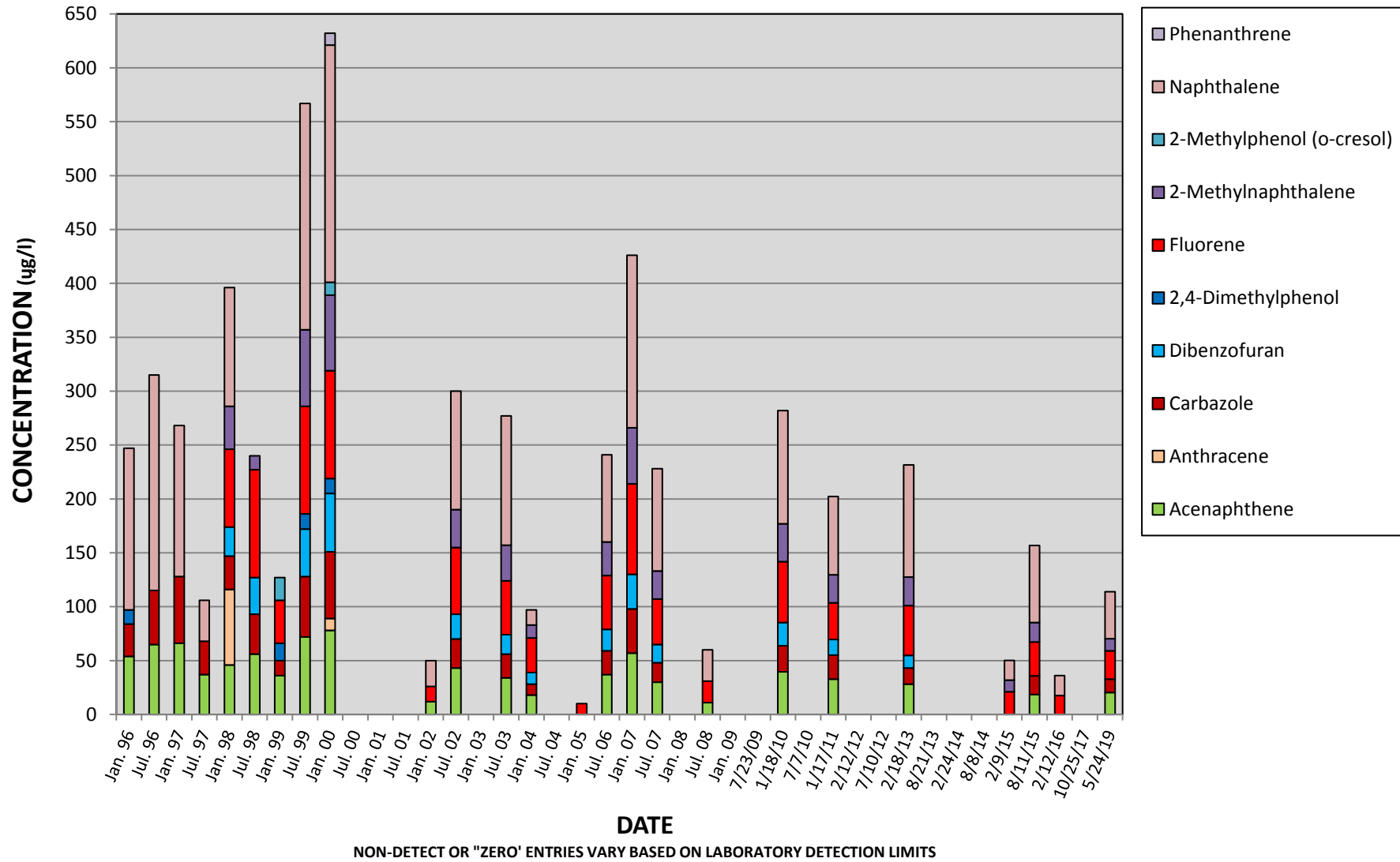
DATE
NON-DETECT OR "ZERO" ENTRIES VARY BASED ON LABORATORY DETECTION LIMITS

MANOR TIMBER SVOC CONCENTRATIONS VS. TIME GRAPH 8. MW-4B

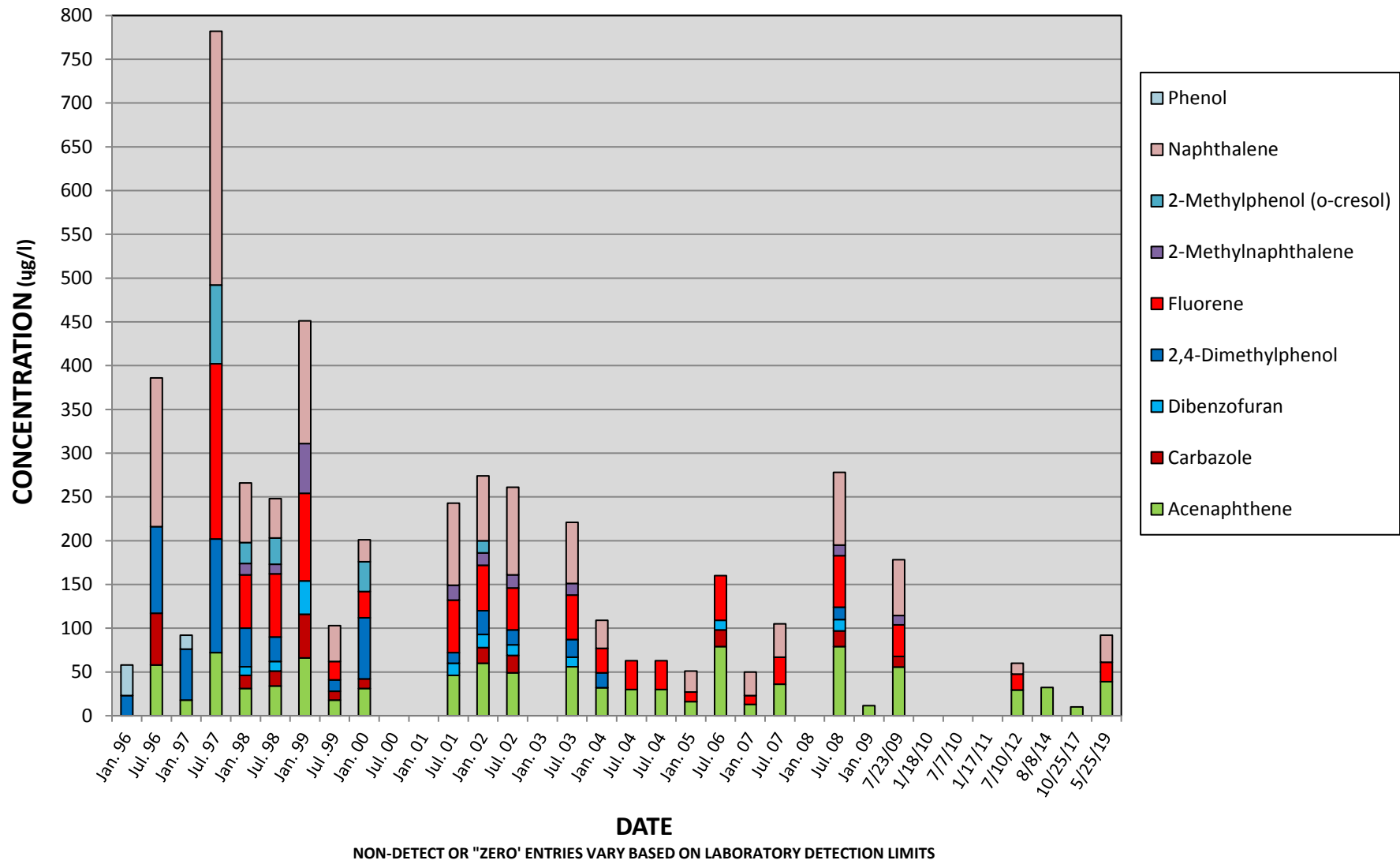


NON-DETECT OR "ZERO" ENTRIES VARY BASED ON LABORATORY DETECTION LIMITS

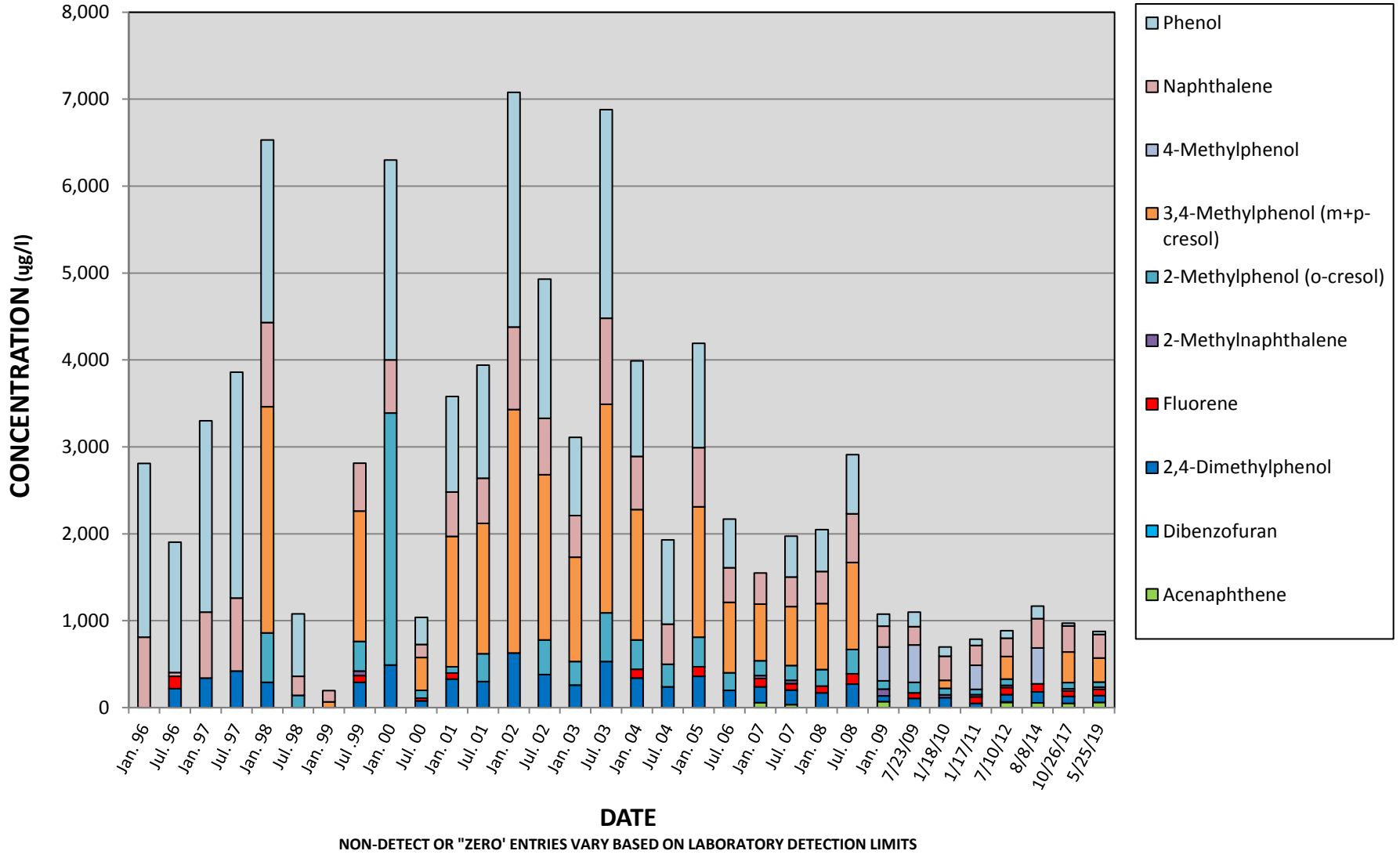
MANOR TIMBER SVOC CONCENTRATIONS VS. TIME GRAPH 9. MW-11



MANOR TIMBER SVOC CONCENTRATIONS VS. TIME GRAPH 10. MW-15

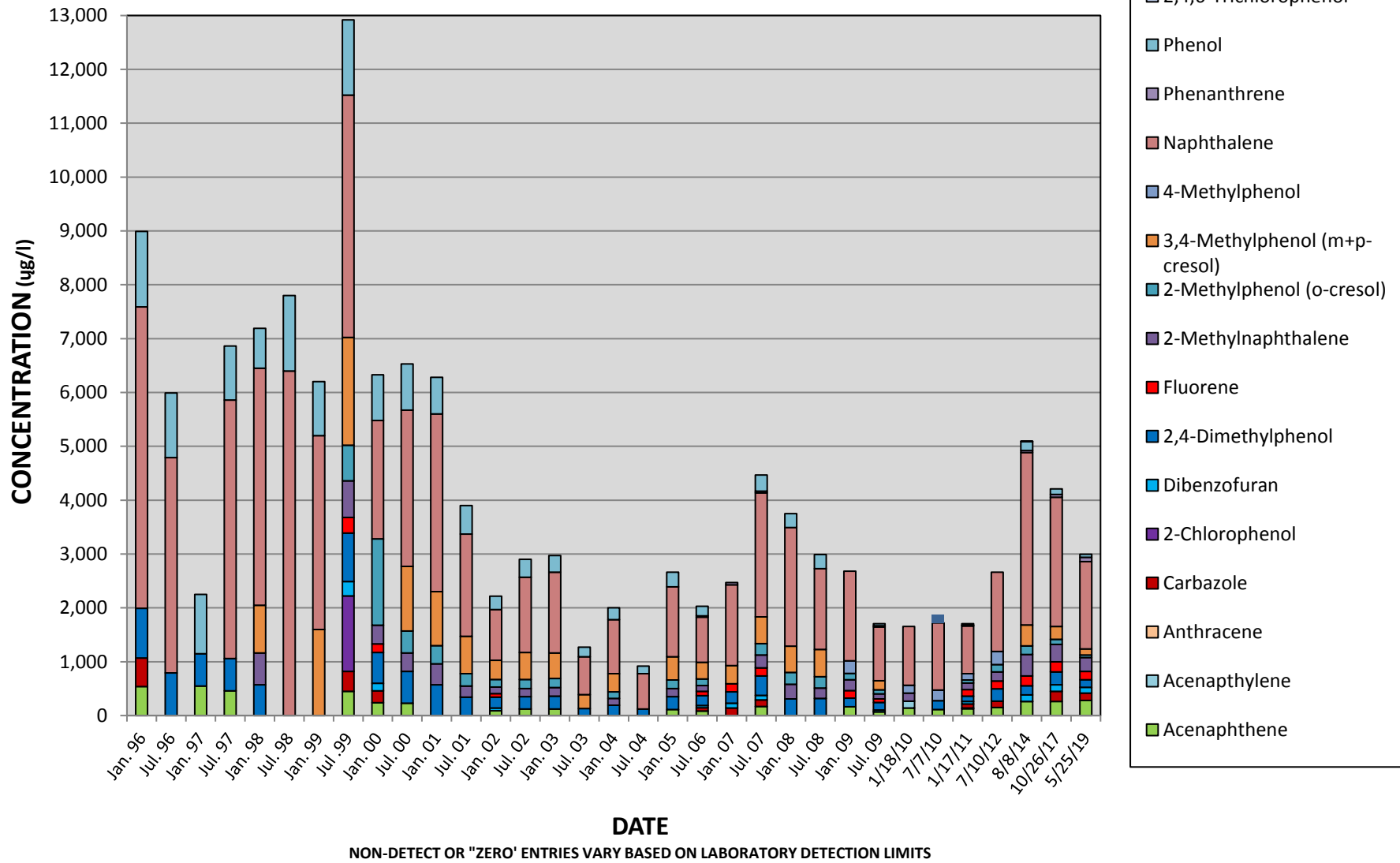


MANOR TIMBER SVOC CONCENTRATIONS VS. TIME GRAPH 11. MW-16

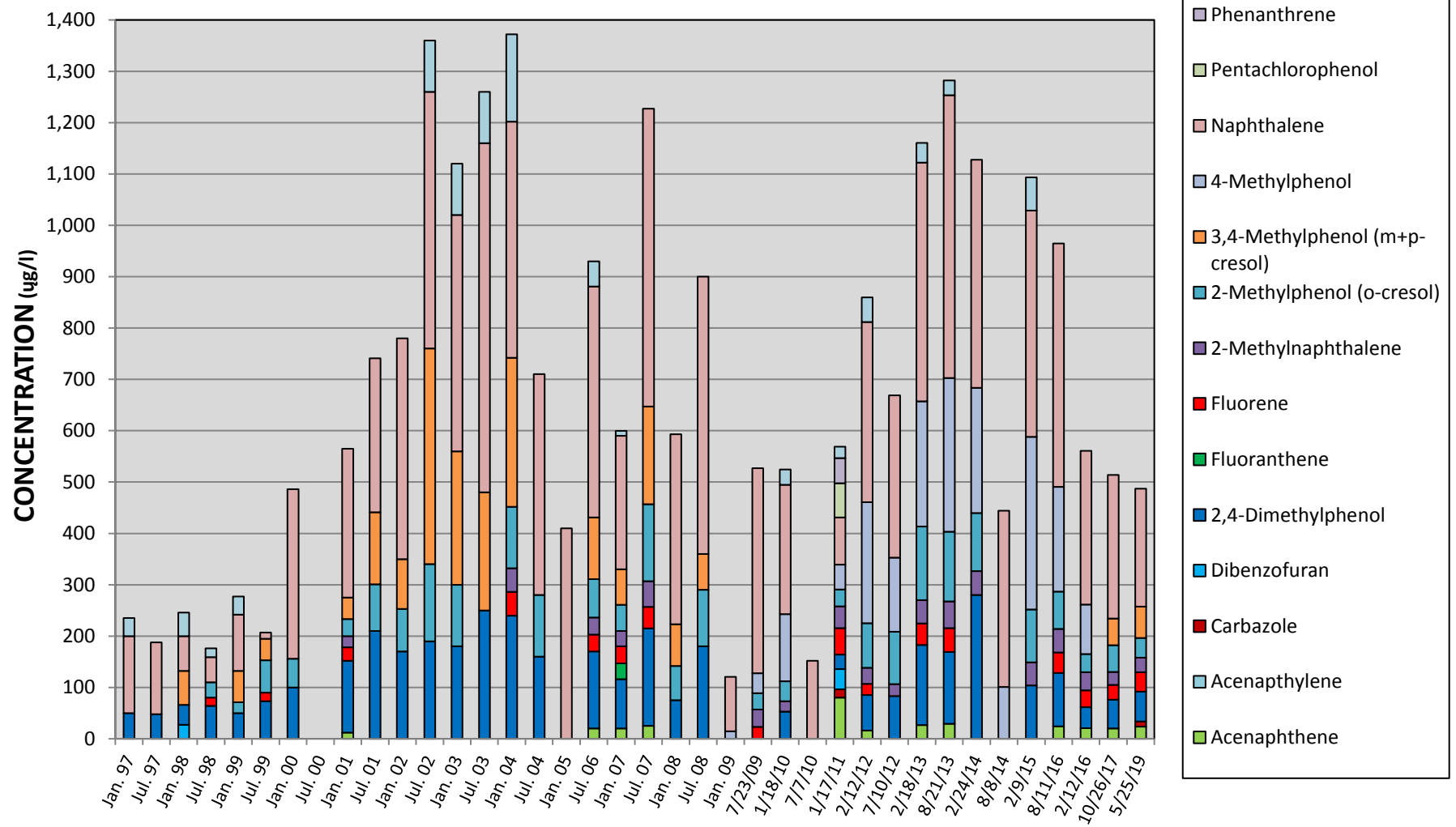


- Phenol
- Naphthalene
- 4-Methylphenol
- 3,4-Methylphenol (m+p-cresol)
- 2-Methylphenol (o-cresol)
- 2-Methylnaphthalene
- Fluorene
- 2,4-Dimethylphenol
- Dibenzofuran
- Acenaphthene

MANOR TIMBER SVOC CONCENTRATIONS VS. TIME GRAPH 12. MW-17



MANOR TIMBER SVOC CONCENTRATIONS VS. TIME GRAPH 13. MW-18



DATE
NON-DETECT OR "ZERO" ENTRIES VARY BASED ON LABORATORY DETECTION LIMITS

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The community map repository should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations (BFEs)** and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or floodplain management.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study report for this jurisdiction.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures for this jurisdiction.

The **projection** used in the preparation of this map was Georgia State Plane East Zone (FIPS zone 1001). The **horizontal datum** was NAD83, GRS1980 spheroid. Differences in datum, spheroid, projection or State Plane zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same **vertical datum**. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at <http://www.ngs.noaa.gov/> or contact the National Geodetic Survey at the following address:

NGS Information Services
NOAA, NNGS12
National Geodetic Survey
SSM-C-3 #9202
1315 East-West Highway
Silver Spring, Maryland 20910-3282
(301) 713-3242

To obtain current elevation, description, and/or location information for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at (301) 713-3242 or visit its website at <http://www.ngs.noaa.gov/>.

Base map information shown on this FIRM was derived from National Agriculture Imagery Program (NAIP) at a scale of 1:20,000 from photography dated 2007 or later.

The **profile base lines** depicted on this map represent the hydraulic modeling baselines that match the flood profiles in the FIS report. As a result of improved topographic data, the profile base line, in some cases, may deviate significantly from the channel centerline or appear outside the SFHA.

Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

Contact the **FEMA Map Service Center** at 1-800-358-9616 for information on available products associated with this FIRM. Available products may include previously issued Letters of Map Change, a *Flood Insurance Study report*, and/or digital versions of this map. The FEMA Map Service Center may also be reached by Fax at 1-800-358-9620 and its website at <http://www.msc.fema.gov/>.

If you have **questions about this map** or questions concerning the National Flood Insurance Program in general, please call 1-877-FEMA MAP (1-877-336-2627) or visit the FEMA website at <http://www.fema.gov/business/nfip/>.

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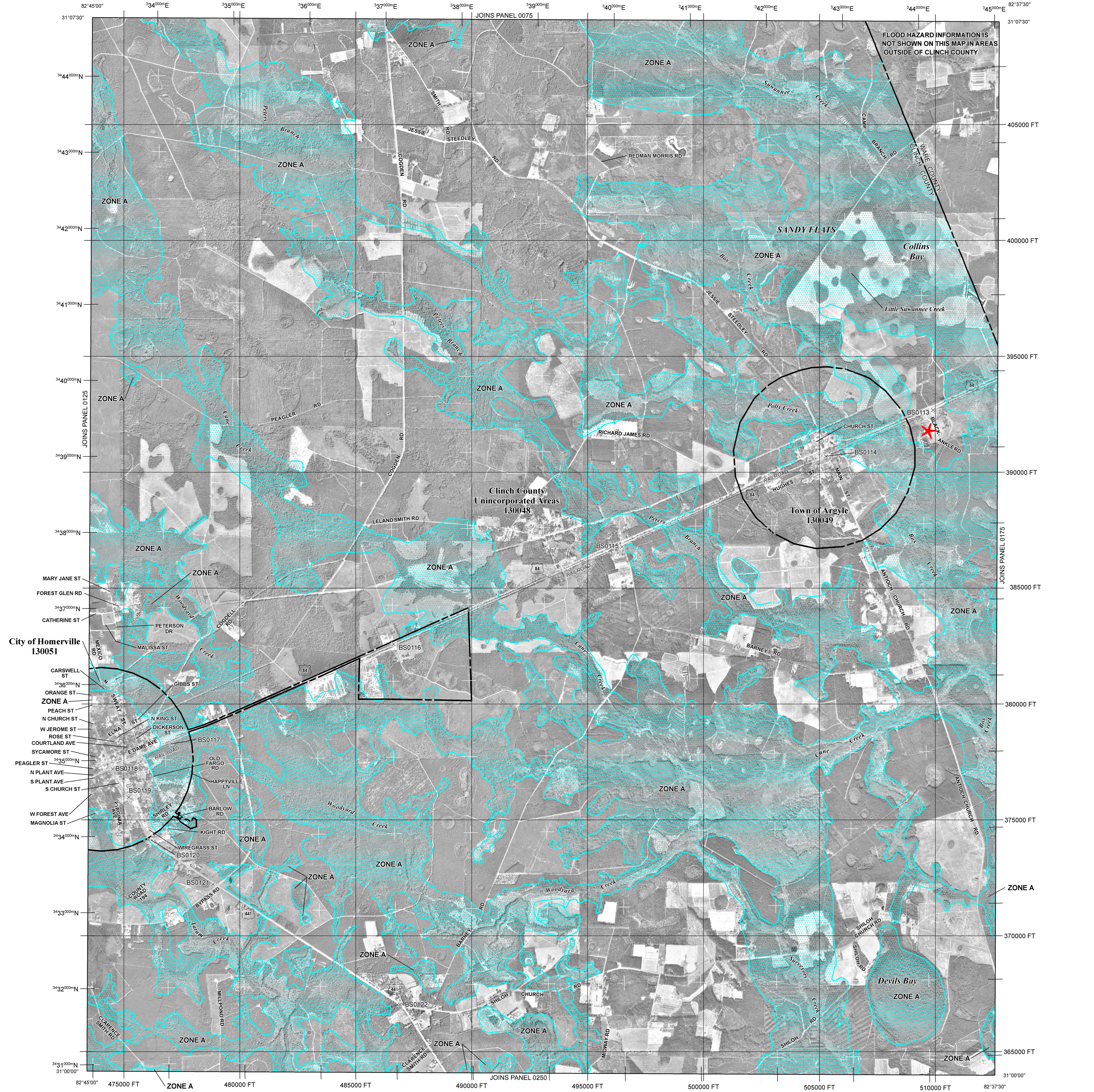
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LEGEND

SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Areas to be protected from 1% annual chance flood event by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

- ZONE X** Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

- ZONE X** Areas determined to be outside the 0.2% annual chance floodplain.
- ZONE D** Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

- 1% annual chance floodplain boundary
- 0.2% annual chance floodplain boundary
- Floodway boundary
- Zone boundary
- Zone D boundary
- CBRS and OPA boundary
- Boundary dividing Special Flood Hazard Area Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths, or flood velocities
- Base Flood Elevation line and value; elevation in feet* (EL 987)
- Base Flood Elevation value where uniform within zone; elevation in feet*

* Referenced to the North American Vertical Datum of 1988

— Cross section line

— Transect line

97°07'30", 32°22'30" Geographic coordinates referenced to the North American Datum of 1983 (NAD 83), Western Hemisphere

4750000 FT 1000-meter Universal Transverse Mercator grid ticks, zone 17

6000000 FT 5000-foot grid values: Georgia State Plane coordinate system, East Zone (FIPSZONE = 1001), Transverse Mercator projection

DX5510 Bench mark (see explanation in Notes to Users section of this FIRM panel)

● M1.5 River Mile

MAP REPOSITORIES
Refer to Map Repositories list on Map Index

EFFECTIVE DATE OF COUNTYWIDE FLOOD INSURANCE RATE MAP
SEPTEMBER 11, 2009

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

MAP SCALE 1" = 2000'

1,000 0 1,000 2,000 3,000 4,000 FEET
600 0 600 1,200 METERS

NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0150D

FIRM

FLOOD INSURANCE RATE MAP

CLINCH COUNTY, GEORGIA

AND INCORPORATED AREAS

PANEL 150 OF 575

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
ARGYLE TOWN OF	130049	0150	D
CLINCH COUNTY	130048	0150	D
HOMERVILLE, CITY OF	130051	0150	D

Notice to User: The Map Number shown below should be used when placing map orders. The Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER 13065C0150D

EFFECTIVE DATE SEPTEMBER 11, 2009

Federal Emergency Management Agency



National Flood Hazard Layer FIRMMette



82°38'11"W 31°4'43"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- | | | |
|------------------------------------|--|--|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE)
<i>Zone A, V, A99</i> |
| | | With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i> |
| | | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile <i>Zone X</i> |
| | | Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i> |
| | | Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i> |
| | | Area with Flood Risk due to Levee <i>Zone D</i> |
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i> |
| | | Effective LOMRs |
| GENERAL STRUCTURES | | Area of Undetermined Flood Hazard <i>Zone D</i> |
| | | Channel, Culvert, or Storm Sewer |
| | | Levee, Dike, or Floodwall |
| OTHER FEATURES | | 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
17.5 |
| | | Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| | | Jurisdiction Boundary |
| MAP PANELS | | Digital Data Available |
| | | No Digital Data Available |
| | | Unmapped |
| | | The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location. |



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **3/3/2023 at 1:10 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

0 250 500 1,000 1,500 2,000 Feet 1:6,000

82°37'34"W 31°4'12"N

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

Appendix B2

Post-Closure Care Cost Estimate

Manor Timber Company

Closed Surface Impoundment

for the year ending 2022

Annual Cost

Groundwater Monitoring/sampling

1. <i>Sample collection</i>	2,898.00
2. <i>Laboratory Analyses</i>	8,925.00
3. <i>Other Direct Costs</i>	1,150.00
<i>Subtotal</i>	12,973.00

Inspections (wells, final cover, site control)

1. <i>Labor</i>	2,650.00
2. <i>Misc. Materials</i>	1,325.00
<i>Subtotal</i>	3,975.00

Maintenance (Wells, final cover, site control)

1. <i>Labor</i>	1,620.00
2. <i>Misc. Materials</i>	2,240.00
<i>Subtotal</i>	3,860.00

Corrective Action Program

1. <i>Electricity</i>	4,390.00
2. <i>Replacement carbon filters</i>	3,130.00
3. <i>Disposal cost and used drums</i>	3,720.00
4. <i>Quarterly Analysis</i>	1,150.00
5. <i>Semi-annual reports</i>	5,100.00
<i>Subtotal</i>	17,490.00
<i>Annual Cost</i>	38,298.00

<i>10% Contingency</i>	3,829.80
<i>Total Annual Cost</i>	42,127.80

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*** 1738 1 MB 0.450 ***



MANOR TIMBER COMPANY
 FINANCIAL ASSURANCE TRUST AGREEMENT
 102 BLACK ANKLE RD
 MANOR GA 31550

BEGINNING SEPTEMBER 1, 2021 YOU MAY MAKE 6 DEBIT
 TRANSACTIONS FROM YOUR SAVINGS ACCOUNT IN A QUARTERLY CYCLE
 FREE OF CHARGE. ANY EXCESS WILL BE CHARGED \$1.00 DEBIT ITEM
 CHARGE PER DEBIT TRANSACTION.

PRIMARY ACCT: 03 233100710 STATEMENT PERIOD: 12/27/2021 - 01/24/2022

SUMMARY:

ACCOUNTNUMBER.....	PREVIOUS ..BALANCE..	TOTALDEBITS.....	TOTALCREDITS.....	SERVICE ..CHARGES	ENDING ..BALANCE..
DDA 233100710	437,007.59	.00	1 104.16	.00	437,111.75
MONEY MARKET	233100710				

-- DEPOSITS AND MISCELLANEOUS TRANSACTIONS --

INTEREST PAID	104.16+	01/24
CURRENT INTEREST RATE		.3000 %
YEAR-TO-DATE INTEREST PAID		104.16
AVERAGE BALANCE		437,007.59

-- CHECKS --

NUMBER.....AMOUNT...DATE	NUMBER.....AMOUNT...DATE	NUMBER.....AMOUNT...DATE
--------------------------	--------------------------	--------------------------

-- BALANCE INFORMATION --

DATE.....BALANCE	DATE.....BALANCE	DATE.....BALANCE
12/26 437,007.59	01/24 437,111.75	

NOTE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.

www.fmb.net

Appendix B3

Well Installation Description

The first two series of wells, MW-1 through MW-4 and MW-1A, MW-3A, MW-4A, were installed by Paul Clawson from 1982 to 1984. The drilling and well installation procedures were described in reports which he prepared and are summarized following this section.

The subsequent well installation activities began in April 1991 by the installation of five observation wells, identified as AB-1 through AB-5 and terminated in November 2002 with the installation of RW-2. AB-1 was converted to MW-6. AB-2 was closed in accordance with the Georgia Water Well Standards Act, as described below. AB-3 was converted to MW-16. AB-4 was converted to MW-15. AB-5 is currently in-use as a piezometer.

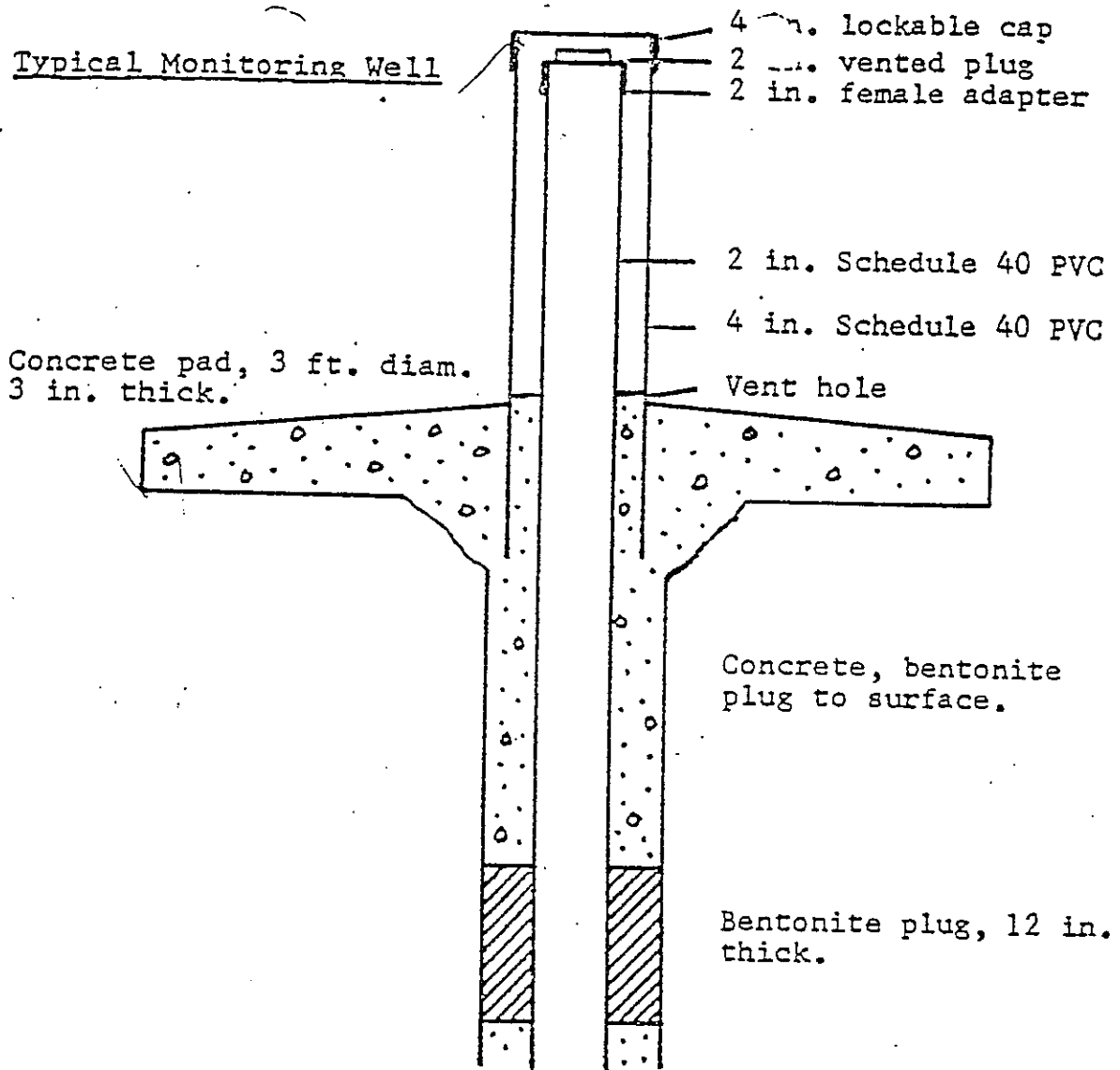
AB2 was abandoned on 11 Nov 92 by tremie grouting with a bentonite cement slurry to 1 foot below ground level. The upper PVC casing was then removed and the hole filled to ground surface with "Holeplug" bentonite chips.

Monitoring wells MW-5, MW-6, MW-7, MW-9, MW-10, MW-12, MW-13, MW-14, MW-15, MW-16, MW-17, MW-18 and MW-19 were all installed using a 5" diameter barrel type hand auger, to a depth of approximately 16 feet, or less. Sampling is continuous with this type of drilling tool and provides excellent data on the soil composition. Where necessary, in order to prevent caving, a 6 inch diameter PVC casing was pushed 3 to 6 feet deep and the augering continued through this casing. A 2" ID, threaded, PVC screen, usually 10' long was set into the open hole and a graded (no 20) silica filter sand slowly poured into the annulus. A 1" PVC pipe was used to keep the sand from bridging by "jogging" the hole during this procedure. The sand was usually brought up to a foot or two above the screen and a bentonite seal (Holeplug or Benseal) placed above the filter sand. This seal was usually brought to a foot, more or less, below ground. Since it was planned to possibly convert these wells to monitoring wells the area above the seal was either left open or filled with soil. All equipment and materials were cleaned to monitoring well standards for this same reason. Shallow wells which were originally planned as monitoring wells were finished above the seal by the use of a cement-sand mix. A 4" steel electrical metal tubing (EMT) protective cover was set to the top of the seal and a locking cap installed. A concrete pad was then placed around the well. This procedure was used for all wells.

Wells MW3B, MW-4B, MW8, RW-1R and RW-2 were installed as described below.

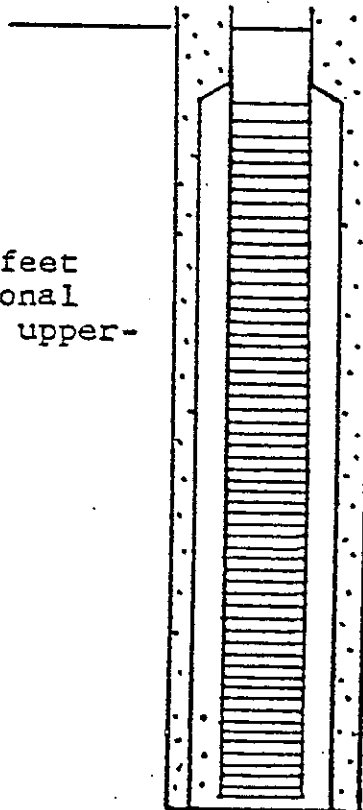
MW-4B and MW8 were drilled using a 3 3/4" ID hollow stem auger. Samples were taken at 5' intervals following ASTM D 1586-84. After completion, the well screens and risers were set and the augers removed. The filters and seals were then placed in the annulus as shown on the boring log. All materials used were as described for the shallow wells.

Typical Monitoring Well



Water Table

Top of screen 10 feet below lowest seasonal water level or in uppermost aquifer.



Annulus of hole filled with -6 +20 well gravel to 12 in. above water table.

Well screen: 2 in. PVC inside 4 in. PVC, both slotted .020 in., both 5 ft. long; annulus filled with -6 +20 well gravel.

Owner Manor Timber Company Screened From 21.0 ft. to 26.0 ft.
Plant near Argyle, GA. Gravel Pack -6+20 mesh to 6.0 ft.
Location M1; north of observation Bentonite Seal 6.0 ft. to 5.0 ft.
well 9. Concrete Seal from 5.0 ft. to sur
Driller Paul N. Clawson Total Well Depth 28.13 ft.
Drilling Mud Used Economy Liquid Polygel Water Level 7.02 ft. below well top

Depth		Lithology	Remarks
From	To		
0	4.1	Medium to coarse sand with abundant organic material.	
4.1	8.5	Tan to gray, very sandy clay. Sand fine to medium.	
8.5	13.5	Tan to gray, sandy clay. Sand is medium to coarse, grains rounded.	
13.5	16.2	Coarse to very coarse sand with minor gray clay.	Sand grains rounded to sub-angular.
16.2	20.8	Cream to pink sandy clay with a few thin beds of medium to coarse sand.	
20.8	26.5	Coarse to extremely coarse sand with a few thin beds of white to orange sandy clay.	Clay beds less than 4" thick. Lost 2gals mud.
26.5	28.2	Coarse sand interbedded with white to orange sandy clay. About equal amounts.	
28.2	36.5	Coarse sand with minor white to orange clay.	
36.5	43.6	Coarse sand with 40% interbedded blue-gray sandy clay. Beds very thin to 1' thick.	
43.6	47.5	Coarse sand with minor orange clay interbedded with 30-40% gray sandy clay.	
47.5	50.5	Tough, plastic green clay. Trace of fine sand at top.	Shuts off mud returns. Plugged bit.
	50.5	Total depth.	

Paul N. Clawson

GA. Geologist Cert. J

Monitoring Well Log

GA. Water Well Lic. 130

Date: May 29, 19

Owner Manor Timber Company

Argyle, Georgia

Location NW corner of waste pond

Well(M5) MIA

Driller Paul N. Clawson

Mud Used Economy Liquid Poly Gel

Screened From 34 1/2 ft. to 39

Gravel Pack -6 +20 mesh to 24

Bentonite Seal 24 ft. to 32

Concrete Seal from 23 ft. to

Water Level ft. below well

Well top elevation

Stick Up 2.70'

Depth		Lithology	Remarks
From	To		
0	4.3	Brown to black, medium sand with 10 to 20% decayed plant remains.	
4.3	8.5	Cream colored. Medium sand.	
8.5	13.1	Cream colored very clayey medium to coarse sand. Color changed to gray at 10 ft.	
13.1	16.3	Interbedded gray sandy clay with coarse sand. Thin beds; equal amounts of both.	Slight mud loss to 1
16.3	21.2	Tough, gray-white sandy clay. Sand fine to coarse	Tends to shut off mud returns.
21.2	24.6	Gray-white sandy clay with 40% of coarse sand interbeds up to 6 inches thick.	
24.6	31.0	Coarse yellow to white sand with a few beds of white clayey fine sand up to 30	inches thick.
31.0	39.5	Coarse sand with a trace to a few percent yellow clay. A few gravel-size grains.	
39.5	43.0	Tough gray to gray-green sandy clay.	Tends to shut off mud returns. Hard drilling
43.0	45.0 TD	Coarse yellow sand with 10% gray to yellow clay.	
			Ream hole to 40 ft. set well screen.
		2" well - screen 2" in 4"	

Owner Manor Timber Company Screened From 32.2 ft. to 37.2 ft.
Plant near Argyle, Georgia Gravel Pack -6+20 mesh to 5.5 ft.
 Location M3; near observation Bentonite Seal 5.5 ft. to 4.4 ft.
well 4. Concrete Seal from 4.4 ft. to sur
 Driller Paul N. Clawson Total Well Depth 39.21 ft.
 Drilling Mud Used Economy Liquid Polygel Water Level 8.19 ft. below well top

Depth		Lithology	Remarks
From	To		
0	3.0	Fine to medium sand, abundant organic material.	
3.0	6.1	Medium to coarse sand w/up to 5% white to tan clay.	
6.1	11.4	White, tough, very sandy clay.	Slow drilling because bit tends to plug.
11.4	16.2	Coarse sand w/a few thin beds of white sandy clay up to 3 in. thick. Few very coarse grains.	Sand grains only slightly rounded.
16.2	23.2	Coarse sand w/minor white clay. (Under 5%)	
23.2	27.5	White to cream very sandy clay. Sand medium to coarse.	
27.5	30.3	Coarse sand w/ up to 10% white to orange clay.	
30.3	38.5	Coarse to extremely coarse sand w/trace to 1% white clay.	
38.5	46.4	White, very clayey, medium to coarse sand. Clay increases toward base.	
46.4	48.7	Light green, tough, plastic clay.	Feels like drilling rubber
	48.7	Total depth.	

DRILLING LOG	COMPANY <i>MANOR TIMBER Co</i>	INSTALLATION <i>ARGYLE GA</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>70' E. of MW 3A</i>	SIZE AND TYPE OF BIT <i>7 7/8" x 4 1/2" fishtail</i>		
DRILLING AGENCY <i>EFT INC</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>6 Oct 91</i>	COMPLETED <i>18 Oct 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>158.6' msl</i>		
TOTAL DEPTH OF HOLE <i>64.5'</i>	ELEVATION GROUND WATER <i>116.52' msl 18 Oct 91</i>		
NAME OF DRILLER <i>TITCOMB</i>	SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb P.G.</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
158.6	0					Protective Cover, 4" ENT 160.89 msl
	0-5		SM black to gray silty fine sand with fibers and wood.			concrete
	5-10		SC mottled gray, orange clayey sand with occ. organic material			2" PVC riser
	10-20		SC mottled gray orange ^{slightly} clayey medium sand with interbeds of gray sandy clay.			neat cement grout with 4% bentonite, tremied in place
	20-30		SM gray to yellow, ^{silty} medium to coarse sand, becomes more clayey with depth.			5" PVC casing
	30-40		SC			
	40-50		CL pale green, sandy clay			Bottom 5" casing
	50-55		SC green-gray clayey sand			Bottom 7 7/8" hole Top of Filter
	55-60		CL gray sandy clay			Top of Screen
	60-62		SC gray clayey sand			2" x 10" Monotlex screen, .010" slot.
	62-64.5		CL blue-gray sandy clay			silica sand, No. 20 Coastal Aggregates
	64.5		Bottom of Hole 64.5'			cap

W.L.
115.21
24 Nov 91

Owner Manor Timber Company Screened From 31.5 ft. to 36.5 ft.
Plant near Argyle, Georgia Gravel Pack -6+20 mesh to 5.6 ft.
 Location M4; about 60 ft. west of Bentonite Seal 5.6 ft. to 4.5 ft.
observation well 4, near stored Concrete Seal from 4.5 ft. to sur.
 Driller Paul N. Clawson Total Well Depth 38.88 ft.
 Drilling Mud Used Economy Liquid Polygel Water Level 8.2 ft. below well top.

Depth		Lithology	Remarks
From	To		
0	2	Very densely-packed fill material with thin, creosote-saturated layers up to ½" thick.	
2	4.3	Coarse sand w/up to 5% plant material, trace of gray clay.	
4.3	7.1	Tan to gray, very sandy clay w/streaks of orange and red clay up to ½" thick.	
7.1	10.5	Red medium to coarse sand w/up to 5% orange to red clay.	
10.5	12.4	Cream to orange very sandy clay. Sand is medium to coarse, grains well rounded.	
12.4	19.5	Coarse white sand. Few thin very sandy beds of white clay 17' to base.	
19.5	23.2	White to tan sandy clay. Sand fine to coarse.	
23.2	25.3	Coarse white sand w/minor gray clay.	
25.3	27.0	Very clayey medium to coarse sand.	
27.0	37.5	Coarse white sand. At 32½', color changes to orange. Few 1" beds of white sandy clay below 32 ft.	
37.5	47.8	Coarse white sand lightly cemented with 10-20% white and blue-gray clay.	Slows mud return.
7.8	53.0	Soft, plastic light green clay.	Slows or stops mud return; easily plugs bit.
	53.0	Total depth.	

Paul N. Clawson
 GA. Geologist Cert. 190
 GA. Water Well Lic. 130

Monitoring Well Log

Date: May 30, 1984

Owner: Manor Timber Company
Argyle, Georgia
 Location: Inside gate (M4a)
 Driller: Paul N. Clawson
 Mud Used: Economy Liquid Foly Gel

Screened From 33 ft. to 38
 Gravel Pack -6 +20 mesh to 26
 Bentonite Seal 25 ft. to 26
 Concrete Seal from 25 ft. to
 Water Level _____ ft. below well to
 Well top elevation _____

Depth		Lithology	Remarks
From	To		
0	3.0	Sandy, clayey fill material.	
3.0	9.4	Very sandy tan clay.	
9.4	14.2	Tough, gray-white sandy clay.	Shuts off mud returns. Hard drilling.
14.2	16.1	Slightly clayey, white, coarse to very coarse sand.	
16.1	19.3	Interbeds up to 4 inches thick of coarse sand with 20% white clay with white sandy clay.	
19.3	21.5	Tough, white, slightly sandy clay.	Shuts off mud returns; very hard drilling.
21.5	26.1	Interbedded white clayey coarse sand and white very sandy clay. Sand fine to medium. Beds 3 in. to 10 in. thick.	
26.1	33.0	Coarse white sand with 10% to 15% white clay.	
33.0	38.0	Coarse sand to gravel. Almost pure quartz. Many large angular grains.	Feels very coarse at 3
38.0	40.6	Coarse sand with a trace to 10% yellow and white clay.	
40.6	45.0 TD	Tough gray sandy clay. Sand fine to coarse, makes up 20% to 40% of interval.	

DRILLING LOG	COMPANY Manor Timber	INSTALLATION Manor, GA	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station)	adjacent to MW4A	SIZE AND TYPE OF BIT	3 3/4" ID Hollow Stem Auger
DRILLING AGENCY	EFT INC	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN	
THICKNESS OF OVERBURDEN	na	DATE HOLE	5/18/93
DEPTH DRILLED INTO ROCK	na	STARTED	
TOTAL DEPTH OF HOLE	30.0'	ELEVATION TOP OF HOSE CASING	161.43'
NAME OF DRILLER	Reeves/Titcomb	ELEVATION GROUND WATER	134.84 (5/13/93)
		SIGNATURE OF INSPECTOR OR GEOLOGIST	Earl F. Titcomb P.G.

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
0			Gravel			4" EMT w/ locking cap
2			SM black silty fine sand			Concrete Pad
4			SM pale yellow gray silty fine sand			
6			SC yellow-brown slightly clayey sand - becomes damp			← Sand Mix
8			SC/SM pale yellow pinkish gray medium sand			
10			SC/SM pale yellow gray medium sand			
12						
14			SC light gray medium sand			
16						Top of Seal
18						← "Holeplug" bentonite
20						Top of filter sand
22						Top of Screen
24						← No. 1630 silica sand - Savannah Abrasives
26						
28						← 2" PVC screen 0.10" slot
						← Cap

TD = 30.0'

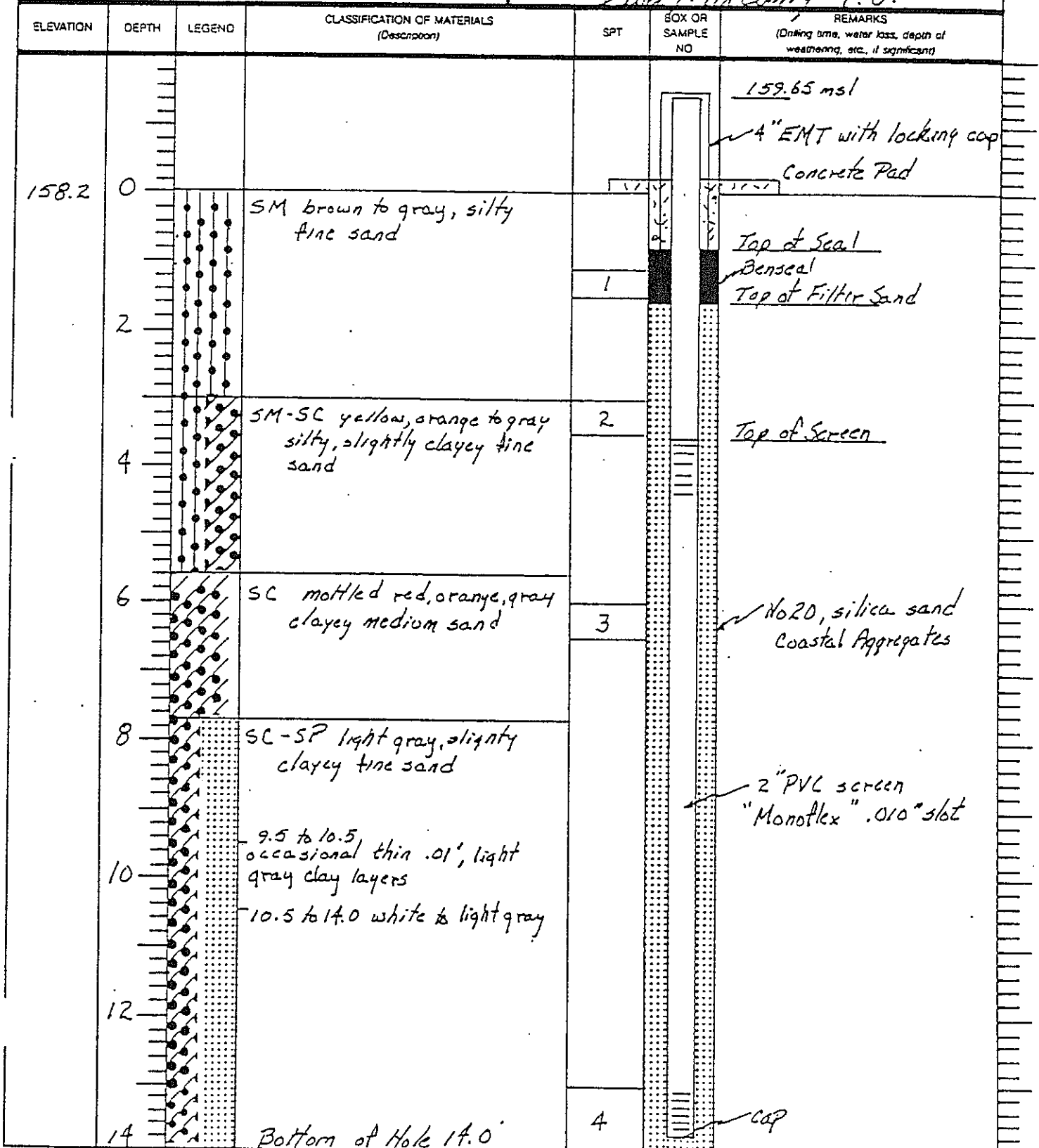
DRILLING LOG	COMPANY <i>MANOR TIMBER COMPANY</i>	INSTALLATION <i>ARGYLE, GA.</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>10' S. of SW corner old impoundment</i>	SIZE AND TYPE OF BIT <i>5" HAND AUGER</i>		
DRILLING AGENCY <i>EFT INC</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>28 Sept 91</i>	COMPLETED <i>29 Sept 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>159.6' ground surface</i>		
TOTAL DEPTH OF HOLE <i>13.5'</i>	ELEVATION GROUND WATER		
NAME OF DRILLER <i>TITCOMB</i>	SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb P.G.</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
159.6	0					161.40 msl
						4" EMT with locking cover
						concrete Pad
	2		SM brown to gray silty fine sand			Top of Seal
			-1.5 to 3.0 minor roots			"Benseal"
			3.0 to 4.5 gray with minor roots			Top of Filter
	4		gray with orange mottling, minor roots, faint odor			Top of Screen
	6		SC orange with gray mottling clayey fine sand			Filter Sand, No 20 silica Sand Coastal Aggregates
			6.8 - 7.5 coarser, more clay, faint odor gray staining			
	8		7.5 to 8.7 fine to medium sand			
			8.7 to 10.5 coarser, less clay, faint odor			
	10		10.5 to 13.5 fine to medium sand, becoming more gray in color			2" PVC screen "Monoflex" .010" slot
	12					cap
			Bottom of Hole 13.5'			

DRILLING LOG	COMPANY MANOR TIMBER CO	INSTALLATION ARGYLE GA.	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) SE corner old road	SIZE AND TYPE OF BIT 5" hand auger		
DRILLING AGENCY EFT INC	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN NA	DATE HOLE	STARTED 6 Apr 91	COMPLETED 6 Apr 91
DEPTH DRILLED INTO ROCK NA	ELEVATION TOP OF HOLE 158.9 msL		
TOTAL DEPTH OF HOLE 15.8'	ELEVATION GROUND WATER 155.66 1 June 91		
NAME OF DRILLER MINTON	SIGNATURE OF INSPECTOR OR GEOLOGIST Earl F. Titcomb J.C.		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
158.9	0		Note: ABI converted to permanent monitoring well 28 Sept 1991	- 161.11' stick up 7-3 & 2M Protective Cover
	2		SM gray silty fine sand 1.5 to 3.0 black to gray mottled	Note: Set 6' of 6" casing to maintain hole during drilling. Pulled as filter was emplaced. Left some in place tempora
WL 155.66 1 June 91	4		3.0 to 5.0 light gray	Top of Seal 2.6" Baroid Holeplug Top of Filter 3.7
	6		SM-SC mottled orange-red-gray, silty slightly clayey sand, slight odor	Top of Screen
	8		light gray silty medium sand very slightly clayey	
	8.5		8.5 mottled light gray and reddish orange	2" x 10' Monoflex Screen .010" slot
	10		SC gray & orange clayey sand very stiff	silica sand, 16.20 "Coastal Aggregates"
	11.5		11.5 more sandy, light gray	
	14			cap
			Total Depth 15.8'	
	18			

DRILLING LOG	COMPANY MANOR TIMBER COMPANY	INSTALLATION ARGYLE GA	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) Old House near gate	SIZE AND TYPE OF BIT 5" hand auger		TOTAL NO. OF OVERBURDEN SAMPLES TAKEN 4
DRILLING AGENCY EFT INC	THICKNESS OF OVERBURDEN NA	DATE HOLE STARTED 6 Oct 91	COMPLETED 6 Oct 91
DEPTH DRILLED INTO ROCK NA	TOTAL DEPTH OF HOLE 14.0'	ELEVATION TOP OF HOLE 158.2 ground surface	
NAME OF DRILLER MINTON		SIGNATURE OF INSPECTOR OR GEOLOGIST Earl F. Titcomb P.G.	



DRILLING LOG	COMPANY <i>MANOR TIMBER Co</i>	INSTALLATION <i>ARGYLE, GA.</i>	SHEET 1
LOCATION (Coordinates or Station)	SIZE AND TYPE OF BIT <i>3 3/4" ID HSA, 1 1/2" splitspoon</i>		OF 1 SHEETS
DRILLING AGENCY <i>EFT Inc</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN <i>5</i>		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE <i>17 Nov 91</i>	COMPLETED <i>24 Nov 91</i>	
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>157.4'</i>		
TOTAL DEPTH OF HOLE <i>25.7'</i>	ELEVATION GROUND WATER		
NAME OF DRILLER <i>TITCOMB</i>	SIGNATURE OF INSPECTOR OF GEOLOGIST <i>Earl F. Titcomb P.G.</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
157.4	0		SM gray to yellow silty fine sand			153.10 msl 4" EMT Protective Cover
	4		SC yellow-gray clayey med. sand 5.0 to 8.0 mottled red & yellow	28	1	Cement grout w/ bentonite Top of Seal
	8		water level during drilling 8.0 to 12.5 pale yellow green			Benscal Top of Filter
	12			16	2	Top of Screen
	16		SC-SM pale olive gray slightly clayey, silty medium sand. Interbedded silty saturated sand layers with layers of very clayey sand.	16	3	2" x 10" "Monotex" PVC screen, .010" slot
	20			19	4	Silica sand, No 20 Coastal Aggregates
	24					Bottom of Screen
			SC pale olive green, clayey medium sand	32	5	clay cuttings
			Bottom of Hole 25.7			
						BLOWS PER FOOT: Number required to drive 3/4" ID splitspoon w/140 lb. hammer falling 30".

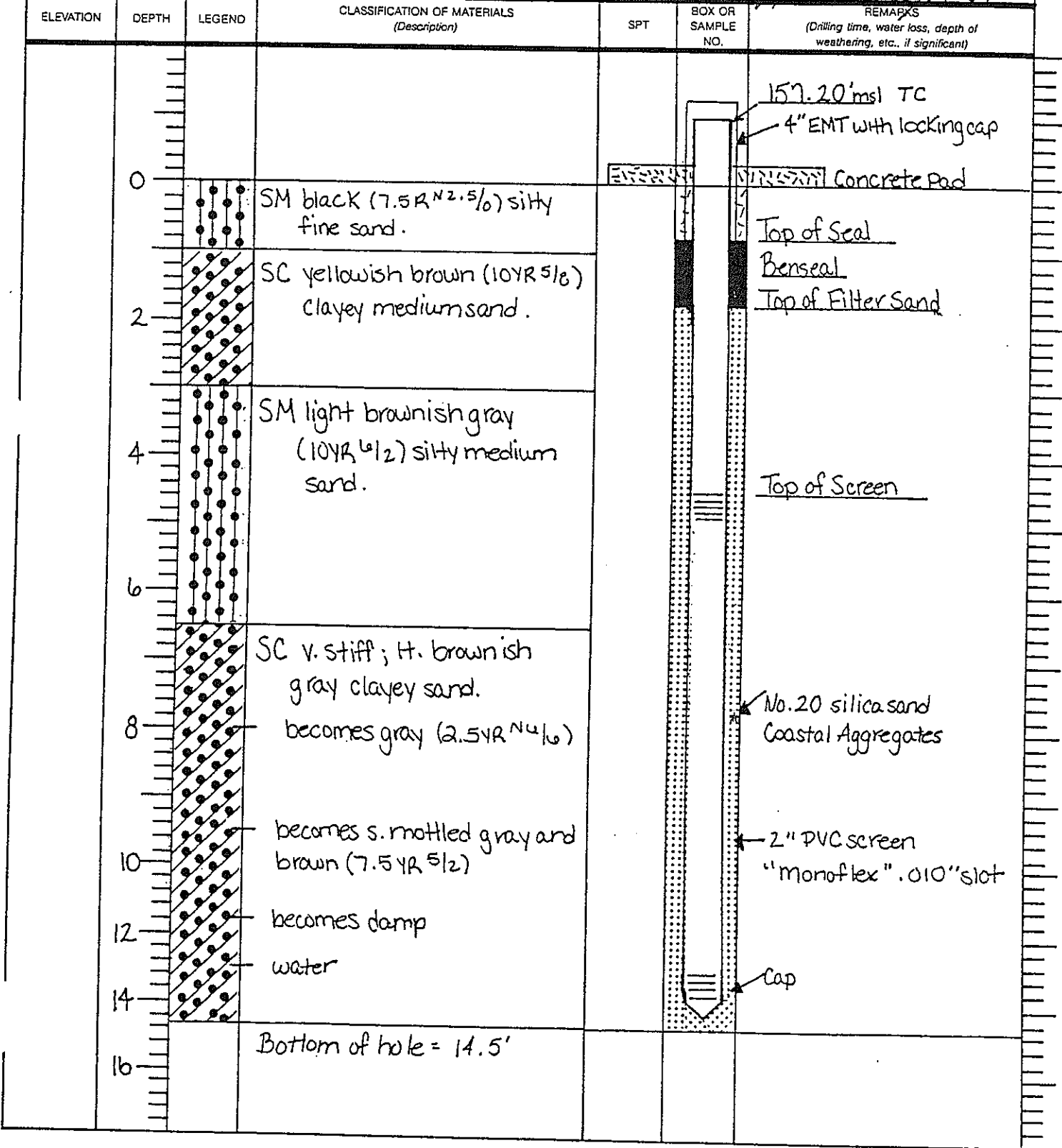
DRILLING LOG	COMPANY Manor Timber Co.	INSTALLATION Aroyle, GA	SHEET 1 OF 1 SHEETS
LOCATION (Coordinates or Station) MW9 - 125' from NE corner fence	SIZE AND TYPE OF BIT 5" auger		
DRILLING AGENCY EET, Inc.	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN 3		
THICKNESS OF OVERBURDEN NA	DATE HOLE 8 Feb 92	STARTED	COMPLETED
DEPTH DRILLED INTO ROCK NA	ELEVATION TOP OF HOLE 156.24'		
TOTAL DEPTH OF HOLE 14.7'	ELEVATION GROUND WATER 155.25' (Feb 20, 1992)		
NAME OF DRILLER Minton	SIGNATURE OF INSPECTOR OR GEOLOGIST Earl F. Titcomb P.G.		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX/LOR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
						4" EMT with locking cap
0			organic matter			concrete pad
			SM black silty fine sand with roots and other debris			Top of Seal
2			SM gray (10YR 5/1) with slight amount of orange slightly clayey sand			Top of Filter Sand
				1		Top of Screen
4			SM gray (10YR 5/1) more cohesive, slightly clayey, medium sand			
				2		
6						No 20, silica sand Coastal Aggregates
8						
10			SM very dark gray (5YR 3/1) fine-medium silty sand			2" PVC screen "Monoflex" .010" slot
12						
14						cap
				3		
			Bottom of hole 14.7'			

DRILLING LOG	COMPANY Manor Timber Co	INSTALLATION Aracle, GA	SHEET 1 OF 1 SHEETS
LOCATION (Coordinates or Station) MW10 - 125' SE from SE corner		SIZE AND TYPE OF BIT 5" auger	
DRILLING AGENCY EFT, Inc.		TOTAL NO. OF OVERBURDEN SAMPLES TAKEN 4	
THICKNESS OF OVERBURDEN NA		DATE HOLE 8 Feb 92	STARTED COMPLETED
DEPTH DRILLED INTO ROCK NA		ELEVATION TOP OF HOLE 157.94'	
TOTAL DEPTH OF HOLE 13.3'		ELEVATION GROUND WATER 157.23' Feb 20, 1992	
NAME OF DRILLER Minton		SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb, P.G.</i>	

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
0	0		organic rich sandy matter			4" EMT with locking cap
			SM gray silty sand			Concrete pad
			SM light gray (5YR 7/2) silty sand			Top of Seal
				1		Bentonite hole plug
						Top of Filter Sand
						Top of Screen
			SM-SC pale yellow (2.5YR 7/4) silty clayey sand with orange streaks	2		
			SC light gray (2.5YR 7/2) with small orange blebs clayey sand	3		
			no orange			No 20, silica sand Coastal Aggregates
			SC light gray (10YR 7/1) clayey sand much less clay	4		
						2" PVC screen "Monoflex" .010" slot
			Bottom of Hole 13.3'			Cap

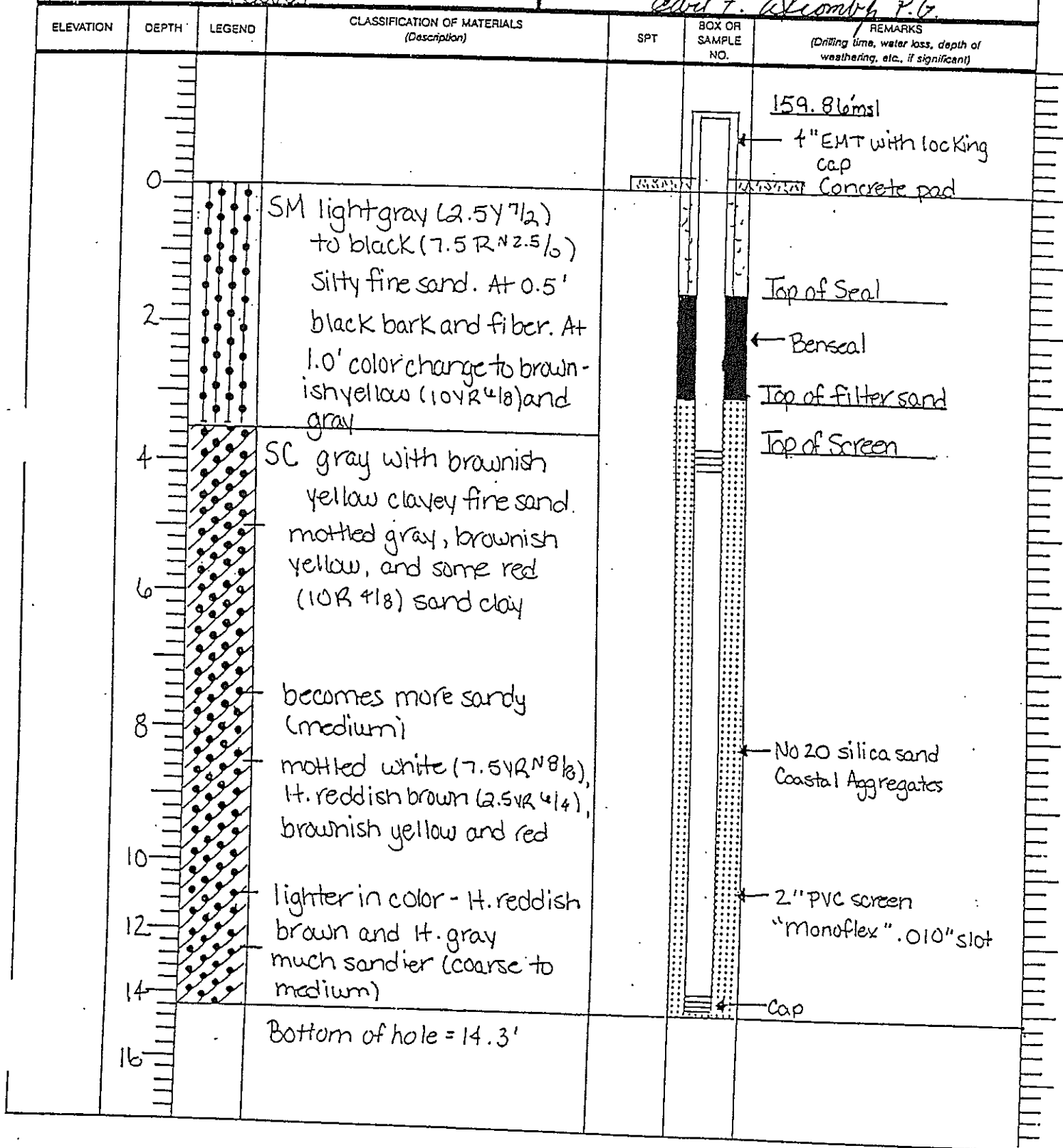
DRILLING LOG	COMPANY <i>Manor Timber Co</i>	INSTALLATION <i>Arable, GA</i>	SHEET 1 OF 1 SHEETS
LOCATION (Coordinates or Station) <i>112' N 67° E from MWZ</i>	SIZE AND TYPE ORBIT <i>5" hand auger</i>		TOTAL NO. OF OVERBURDEN SAMPLES TAKEN <i>na</i>
DRILLING AGENCY <i>EFT Inc.</i>	DATE HOLE <i>5/12/92</i>		STARTED
THICKNESS OF OVERBURDEN <i>na</i>	ELEVATION TOP OF HOLE <i>156.0'</i>		COMPLETED
DEPTH DRILLED INTO ROCK <i>na</i>	ELEVATION GROUND WATER <i>153.26' (May 20, 1992)</i>		SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb P.E.</i>
TOTAL DEPTH OF HOLE <i>14.5'</i>	NAME OF DRILLER <i>Reeves</i>		



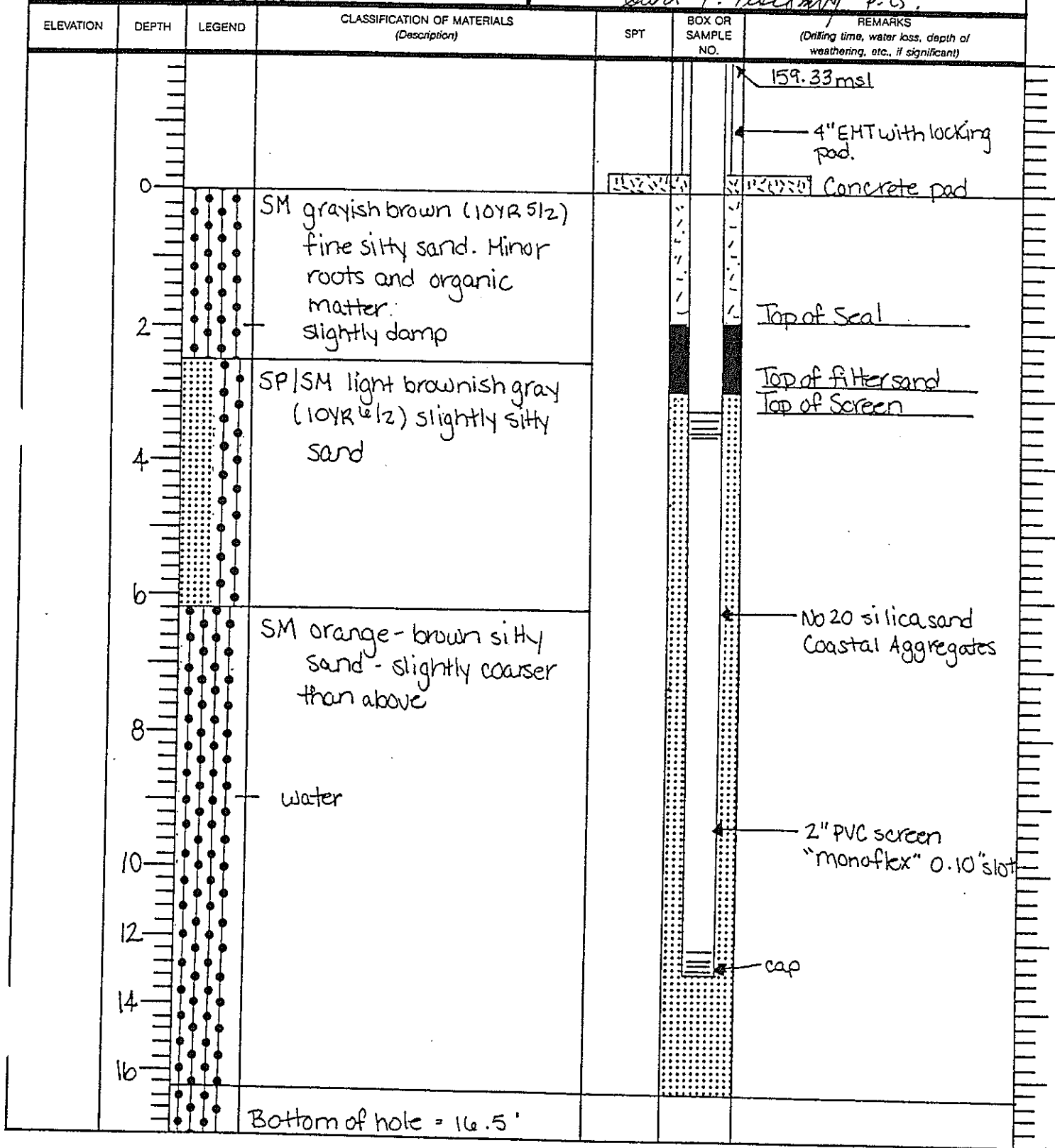
DRILLING LOG	COMPANY Manor Timber Co.	INSTALLATION Arayle, GA	SHEET 1
LOCATION (Coordinates or Station) 130' S of MW8		SIZE AND TYPE OF BIT 5" handauger to 12.5 then 3 1/4" auger	OF 1 SHEETS
DRILLING AGENCY E.F.T. Inc.		TOTAL NO. OF OVERBURDEN SAMPLES TAKEN na	auger
THICKNESS OF OVERBURDEN na		DATE HOLE 5/12/92	STARTED
DEPTH DRILLED INTO ROCK na		ELEVATION TOP OF HOLE 157.5'	COMPLETED
TOTAL DEPTH OF HOLE 14.5'		ELEVATION GROUND WATER 154.41 (June 2, 1992)	
NAME OF DRILLER Reeves & Titcomb		SIGNATURE OF INSPECTOR OR GEOLOGIST Earl F. Titcomb, P.G.	

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
						159.56msl
						4" EMT with locking pad
						Concrete pad
	0		SM grayish brown (10YR 5/2) fine to med silty sand			Top of Seal
	2		SM mottled brownish yellow (10YR 4/8) and very pale brown (10YR 7/4) med. silty sand.			Benseal
	4		SC mottled brownish yellow and light gray (5Y 7/1) less gray; mostly brownish yellow with some red (10R 4/8) v. stiff and plastic; medium coarse sand; becoming lighter and less clayey			Top of filter sand
	6					Top of Screen
	8		Inner layered, light gray			No 20 silica sand Coastal Aggregates
	10		Water table			2" PVC screen "Monoflex" 0.10" slot
	12					cap
	14					
	16		Bottom of hole = 14.5' Hole caved at 12.9'			

DRILLING LOG	COMPANY Manor Timber Co.	INSTALLATION Araville, GA	SHEET 1 OF 1 SHEETS
LOCATION (Coordinates or Station) H. 7' S 54° W of HW 4A	DRILLING AGENCY EFT Inc.	SIZE AND TYPE OF BIT 5" hand auger	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN no
THICKNESS OF OVERBURDEN na	DEPTH DRILLED INTO ROCK na	DATE HOLE 5/13/92	STARTED
TOTAL DEPTH OF HOLE 14.3'	NAME OF DRILLER Reeles	ELEVATION TOP OF HOLE 158.7'	COMPLETED
		ELEVATION GROUND WATER 154.40 (June 2, 1992)	
		SIGNATURE OF INSPECTOR OR GEOLOGIST Earl F. Titcomb P.G.	



DRILLING LOG	COMPANY Manor Timber Co	INSTALLATION Argyle, GA	SHEET OF SHEETS
LOCATION (Coordinates or Station) 272' N 70° E of MW 2	DRILLING AGENCY EFT, Inc.	SIZE AND TYPE OF BIT 5" hand auger	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN
THICKNESS OF OVERBURDEN NA	DEPTH DRILLED INTO ROCK NA	DATE HOLE 17 JUN 1992	STARTED
TOTAL DEPTH OF HOLE 16.5'	NAME OF DRILLER Reeves	ELEVATION TOP OF HOLE 156.57	COMPLETED
		ELEVATION GROUND WATER 152.19 (24 July 1992)	
		SIGNATURE OF INSPECTOR/OR-GEOLOGIST Earl F. Titcomb, Jr. P.G.	

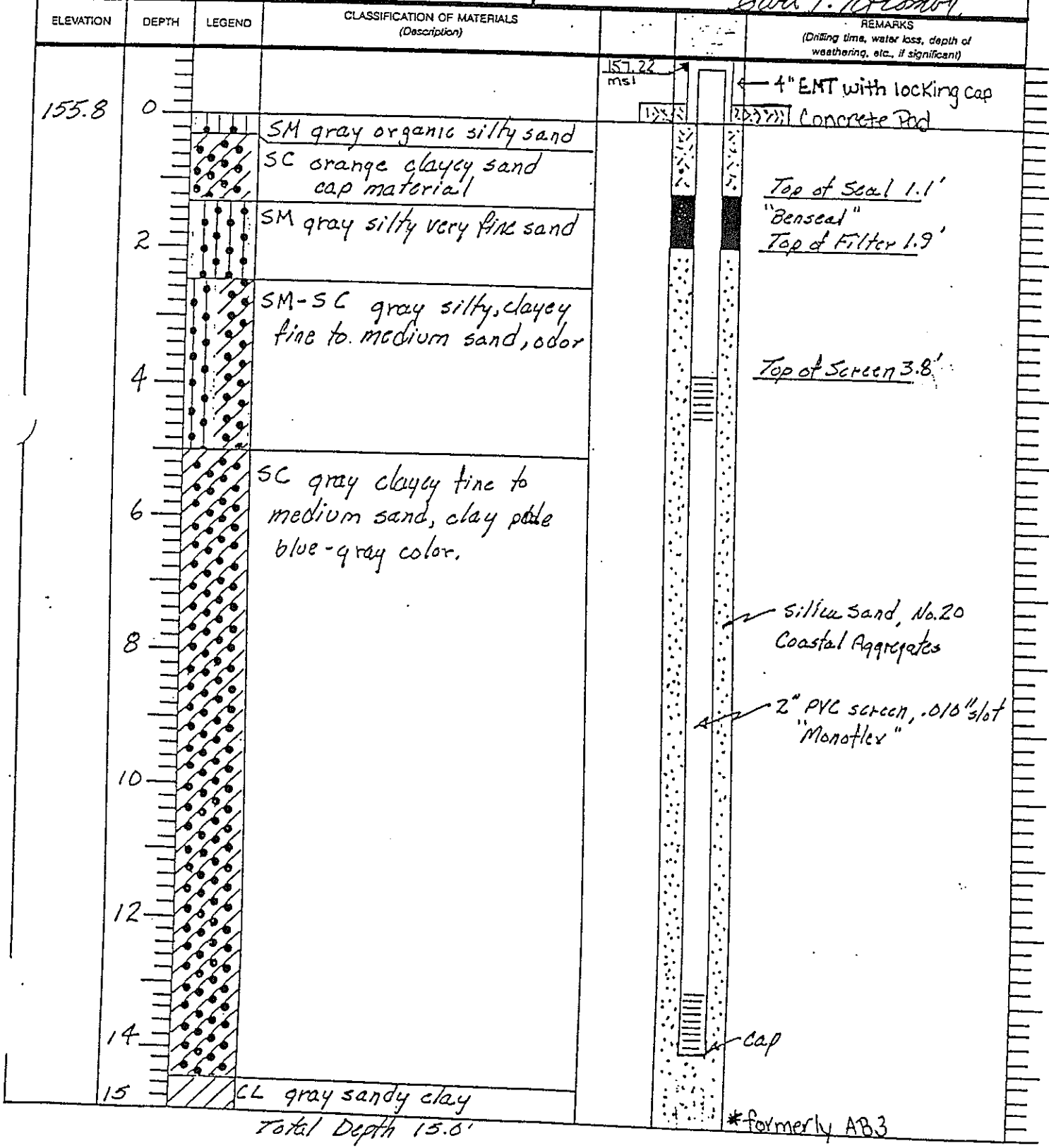


DRILLING LOG	COMPANY <i>MANOR TIMBER CO</i>	INSTALLATION <i>ARGYLE, GA</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>E. of pond - near MW2</i>	SIZE AND TYPE OF BIT <i>5" Auger</i>		
DRILLING AGENCY <i>EFT INC</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>3 May 91</i>	COMPLETED <i>3 May 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>156.7' msl</i>		
TOTAL DEPTH OF HOLE <i>10.6'</i>	ELEVATION GROUND WATER <i>155.96, 1 June 91</i>		
NAME OF DRILLER <i>MINTON</i>	SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Carl F. Fitzsimmons</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
						158.49 msl
156.7	0		SC mottled orange-red gray clayey sand			← 4" EMT with locking cap
155.96			SM gray silty sand			Concrete Pad
1 June 91			SM gray silty medium to fine sand			Top of Seal 1.0'
	2		SM gray silty medium to fine sand			"Benseal"
			SM-SC gray silty-clayey fine to medium sand.			Top of Filter 2.2'
	4					Top of Screen 3.1'
	6					No 30 silica sand Scruggs Sand Co.
	8					2" PVC, .010" slot
	10					cap
			Total Depth 10.6'			

*formerly AB4

DRILLING LOG	COMPANY <i>MANOR TIMBER CO</i>	INSTALLATION <i>ARGYLE GA.</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>NE corner old pond</i>	SIZE AND TYPE OF BIT <i>5" auger</i>		TOTAL NO. OF OVERBURDEN SAMPLES TAKEN
DRILLING AGENCY <i>EFT INC</i>	THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>3 May 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	TOTAL DEPTH OF HOLE <i>15.0'</i>	COMPLETED <i>3 May 91</i>	
NAME OF DRILLER <i>MINTON</i>	ELEVATION TOP OF HOLE <i>155.8</i>		ELEVATION GROUND WATER <i>155.59' 1 June 91</i>
		SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb</i>	



DRILLING LOG	COMPANY Manor Timber Co.	INSTALLATION Manor, GA	SHEET 1 OF 1 SHEETS
LOCATION (Coordinates or Station)	SIZE AND TYPE OF BIT 5" hand auger		
DRILLING AGENCY EFT INC	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN 1		
THICKNESS OF OVERBURDEN na	DATE HOLE 5/19/93	STARTED	COMPLETED
DEPTH DRILLED INTO ROCK na	ELEVATION TOP OF HOLE casing 157.95		
TOTAL DEPTH OF HOLE 15.7'	ELEVATION GROUND WATER 154.63 (6/13/93)		
NAME OF DRILLER Reeves/Titcomb	SIGNATURE OF INSPECTOR OR GEOLOGIST Earl F. Titcomb P.G.		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
	0					4" EMT w/ locking cap Concrete Pad
	1		SC orange silty clayey sand			
	2		SM light gray/brownish gray silty fine sand			Concrete Mix
	3					Top of Seal "Holeplug" bentonite
	4		SC light gray slightly clayey fine sand			Top of Filter Sand
	5		at 4.5' becomes coarser grained - medium sand			Top of Screen
	6					
	7					
	8					
	9					
	10					No. 1630 silica sand - Sawamah Abrasives
	12					2" PVC Screen 0.10" Slot
	14					cap
	16		Total Depth = 15.7'			

DRILLING LOG		COMPANY <i>Manor Timber Co</i>	INSTALLATION <i>Argyle, Ga</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>N. of MW16</i>		SIZE AND TYPE OF BIT <i>5" Hand Auger</i>		
DRILLING AGENCY <i>EFT</i>		TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN <i>NA</i>		DATE HOLE	STARTED <i>29 Nov 1996</i>	COMPLETED <i>29 Nov 1996</i>
DEPTH DRILLED INTO ROCK <i>NA</i>		ELEVATION TOP OF HOLE <i>158.93' msl</i>		
TOTAL DEPTH OF HOLE <i>16.1'</i>		ELEVATION GROUND WATER <i>154.83' msl (31 Dec 96)</i>		
NAME OF DRILLER <i>Minton</i>		SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
	0					<i>158.93'</i> <i>4" steel cover</i>
	5		<i>SM/S gray very slightly silty & clayey, fine sand</i>			<i>Top of Seal</i> <i>"Holeplug"</i> <i>Top of Filter Sand</i> <i>Top of Screen</i>
<i>WL 4.10</i> <i>31 Dec 96</i>	10					<i>No. 16-30 silica sand</i>
	15					<i>2" PVC screen, 0.10" slot</i> <i>cap</i>
	20		<i>Total Depth 16.1'</i>			

DRILLING LOG	COMPANY <i>Manor Timber Co</i>	INSTALLATION <i>Argyle, Ga</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>North of WMA</i>	SIZE AND TYPE OF BIT <i>5" diameter auger</i>		
DRILLING AGENCY <i>EFT Inc</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN <i>3</i>		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>9 Sept 98</i>	COMPLETED <i>9 Sept 98</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>160.47 TOC (msl)</i>		
TOTAL DEPTH OF HOLE <i>16.0'</i>	ELEVATION GROUND WATER <i>153.69, 9 Sept 98</i>		
NAME OF DRILLER <i>Ed Minton</i>	SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb Jr</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
157.2	0		SM light to medium gray, slightly silty fine sand			TOP OF CASING Metal COVER
WL 9 Sept 98	4		SP white fine sand			TOP OF BENTONITE 3/8" chips
	4		SM/SC medium gray to pink very slightly silty & clayey fine sand			TOP OF FILTER TOP OF SCREEN
	8		SC medium gray, medium sand with minor light gray clay lenses, interlayered sand layers with clayey sands.			MEDIUM QUARTZ SAND
	12					No. 10 slot, 2" PYC
141.2	16		Bottom of Hole			PLUG BOTTOM SCREEN

DRILLING LOG	COMPANY <i>MANOR TIMBER Co</i>	INSTALLATION <i>ARGYLE, GA.</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station)	SIZE AND TYPE OF BIT <i>6" Fishtail</i>		TOTAL NO. OF OVERBURDEN SAMPLES TAKEN <i>None</i>
DRILLING AGENCY <i>EFT INC.</i>	THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE <i>11 Oct 1997</i>	COMPLETED <i>11 Oct 1997</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	TOTAL DEPTH OF HOLE <i>35.0'</i>	ELEVATION TOP OF HOLE <i>157.54 msl TOC</i>	ELEVATION GROUND WATER <i>150.7 msl 22 Jan 98</i>
NAME OF DRILLER <i>EARL TITCOMB</i>	SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO.	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
0	0		SC orange silty clayey sand			
	2		SM light gray slightly silty fine sand			
5	5		SC light gray slightly clayey fine sand			
10	10					
15	15					
20	20					
25	25		SC/SM very pale brown very slightly clayey fine to coarse sand. (10YR 8/4)			
30	30					
35	35					

Cement Grout
 5.5' Top of Seal
 7.5' Top Sand
 4" stainless steel casing
 Filter Sand
 19' Top Screen
 4" stainless steel, no 10 slot screen, 15' long
 34' Bottom

Bottom of Hole 35'

Project No:

Well ID: RW-2

Project: RCRA Compliance

Client: Manor Timber Company

Enclosure:

Location: Argyle, Georgia

Geologist: Earl Titcomb, Jr., P.G.

SUBSURFACE PROFILE

Depth	Symbol	Description	Sample No.	OVA (ppm)	Well Construction	Remarks
0		Ground Surface				
0 - 15	SC	Light gray fine to coarse sand with clay layers at 15 to 17 feet bgs				1.3' of Stick-Up (not shown) Top of Seal at 0.5' bgs
5						Top of Filter Sand
10						20-feet of Stainless Steel Riser
20						Top of 5-foot No. 20 Screen
25						Top of 10-foot No. 10 Screen
25 - 28	CL	Light gray and yellow sandy clay	S1			
28 - 30	SC/SM	Light gray-yellow gray fine to coarse angular sand				
30 - 35	SC	Light orange-gray slightly clayey fine to coarse sand	S2			
35 - 39.1	SC	Orange slightly clayey coarse sand				Total Well Depth = 34.0' bgs
						Notes: Drilled to 39.1 feet with a 5-inch fishtail bit - well set at 34.0 feet bgs
						bgs = below ground surface

Drilled By: E. Titcomb Jr., P.G.

Environmental Field Technology
EFT INC

Hole Size: 7 1/2-inch O.D.

Drill Method: Mud Rotary

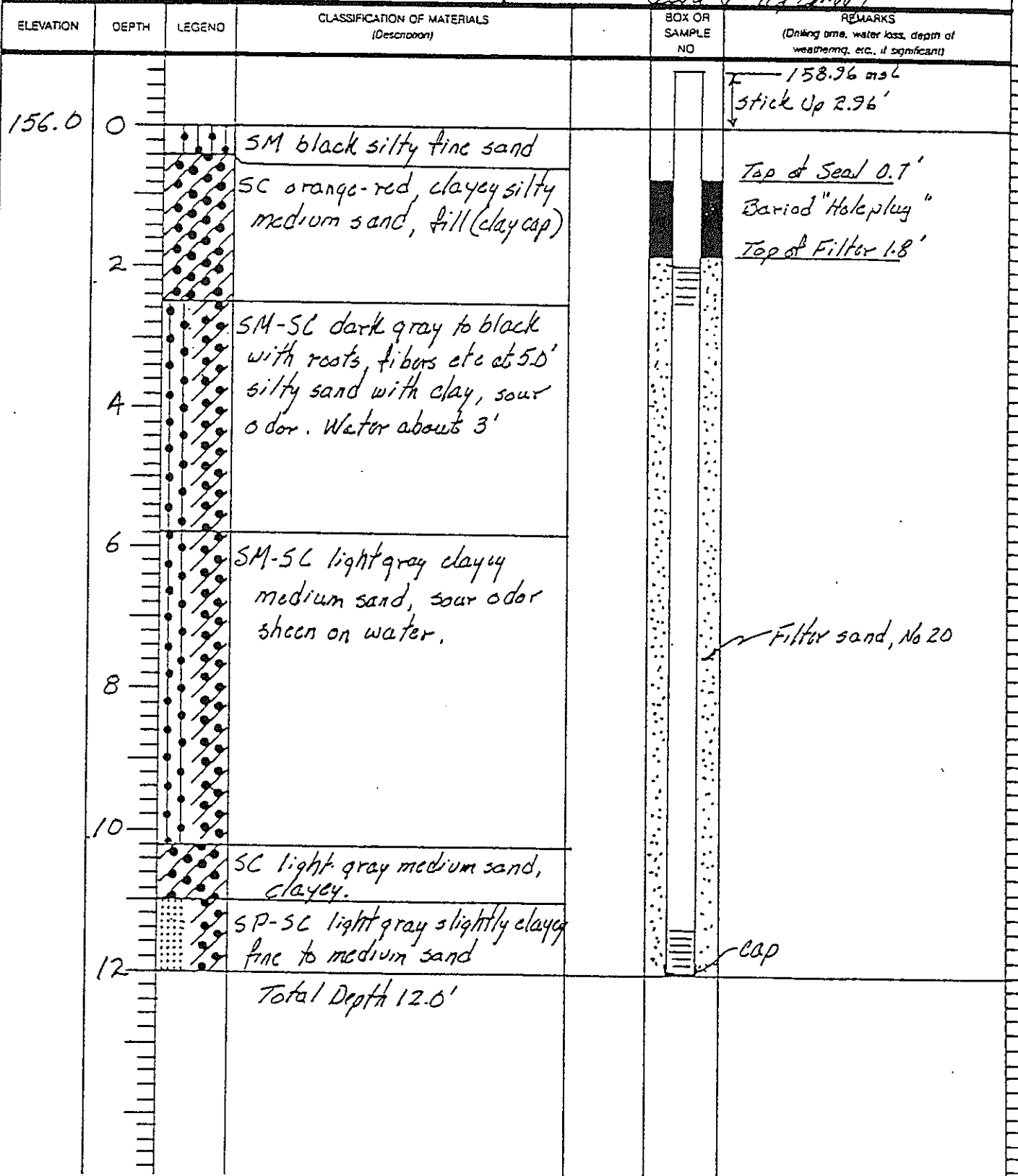
Drill Date: 11-1-02

Sheet: 1 of 1

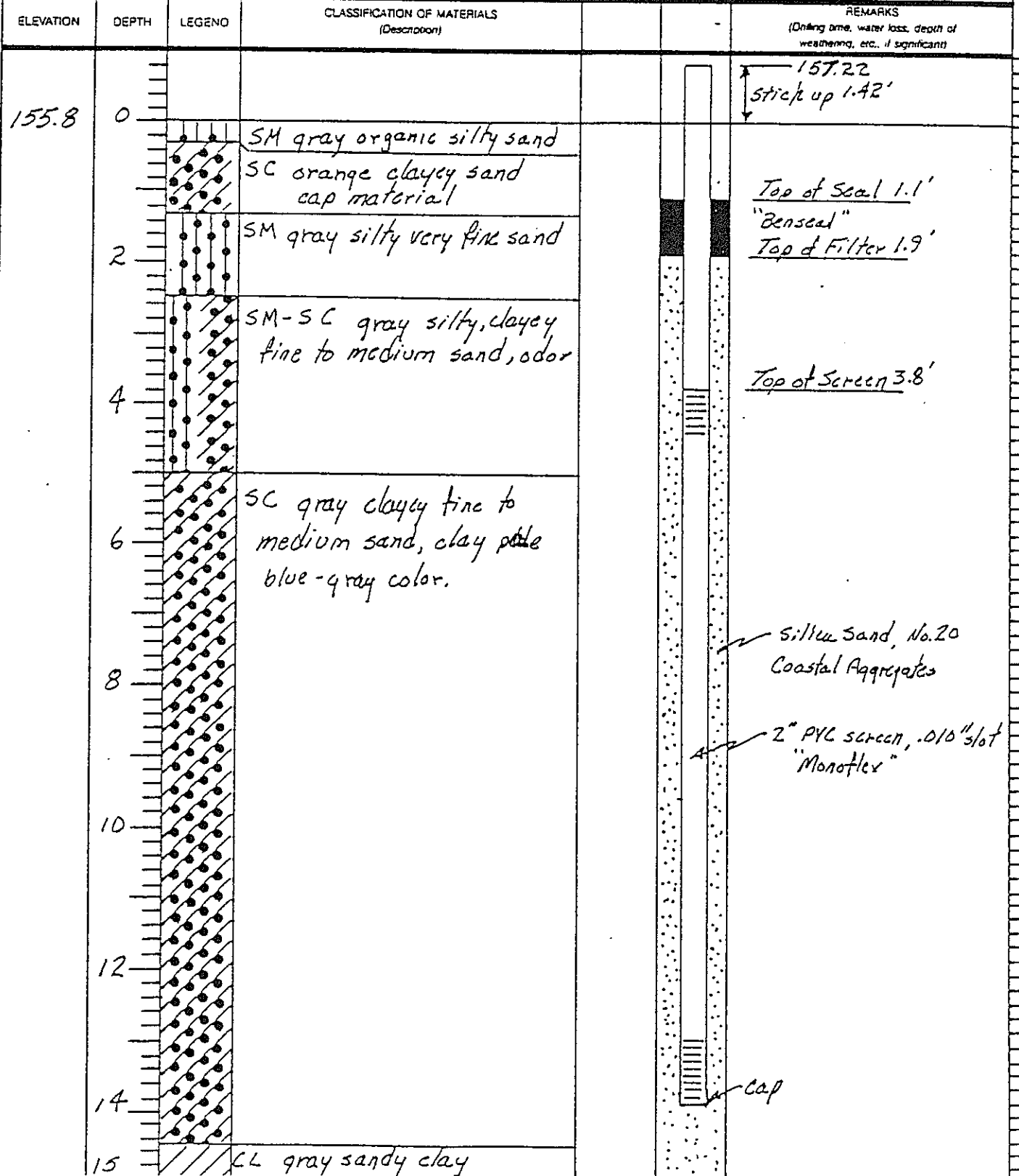
DRILLING LOG	COMPANY <i>MANOR TIMBER CO</i>	INSTALLATION <i>ARGYLE, GA.</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>SE corner old pond</i>	SIZE AND TYPE OF BIT <i>5" hand auger</i>		
DRILLING AGENCY <i>EFT Inc</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN <i>8</i>		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>6 Apr 91</i>	COMPLETED <i>6 Apr 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>158.9 msl</i>		
TOTAL DEPTH OF HOLE <i>15.8'</i>	ELEVATION GROUND WATER <i>155.66 1 June 91</i>		
NAME OF DRILLER <i>MINTON</i>	SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb, Jr.</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
158.9	0			- 161.11' stick up 2.2'
	2		SM gray silty fine sand 1.5 to 3.0 black to gray mottled	Note: Set 6' of 6" casing to maintain hole during drilling. Pulled as filter was emplaced. Left some in place. Top of Seal 2.6'
WL 155.64 1 June 91	4		3.0 to 5.0 light gray	Baroid Holeplug Top of Filter 3.7
	6		SM-SC mottled orange-red-gray, silty slightly clayey sand, slight odor	Top of Screen 5.4
	8		light gray silty medium sand very slightly clayey	
	8.5		8.5 mottled light gray and reddish orange	2" x 10' Monoflex Screen .010" slot
	10		SC gray & orange clayey sand very stiff	silica sand, 16.20 Coastal Aggregates"
	12		11.5 more sandy, light gray Note: change scale at 10'	
	14			
	16			cap
	18		Total Depth 15.8'	

DRILLING LOG	COMPANY <i>MANOR TIMBER CO</i>	INSTALLATION <i>ARGYLE GA</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>NE corner of old pond</i>	SIZE AND TYPE OF BIT <i>5/4" hand auger</i>		
DRILLING AGENCY <i>EFT INC</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>6 Apr 91</i>	COMPLETED <i>6 Apr 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>156.0' msl</i>		
TOTAL DEPTH OF HOLE <i>12.0'</i>	ELEVATION GROUND WATER <i>155.70' 1 June 91</i>		
NAME OF DRILLER <i>MINTON</i>	SIGNATURE OF INSPECTOR OF GEOLOGIST <i>Earl F. Titcomb</i>		



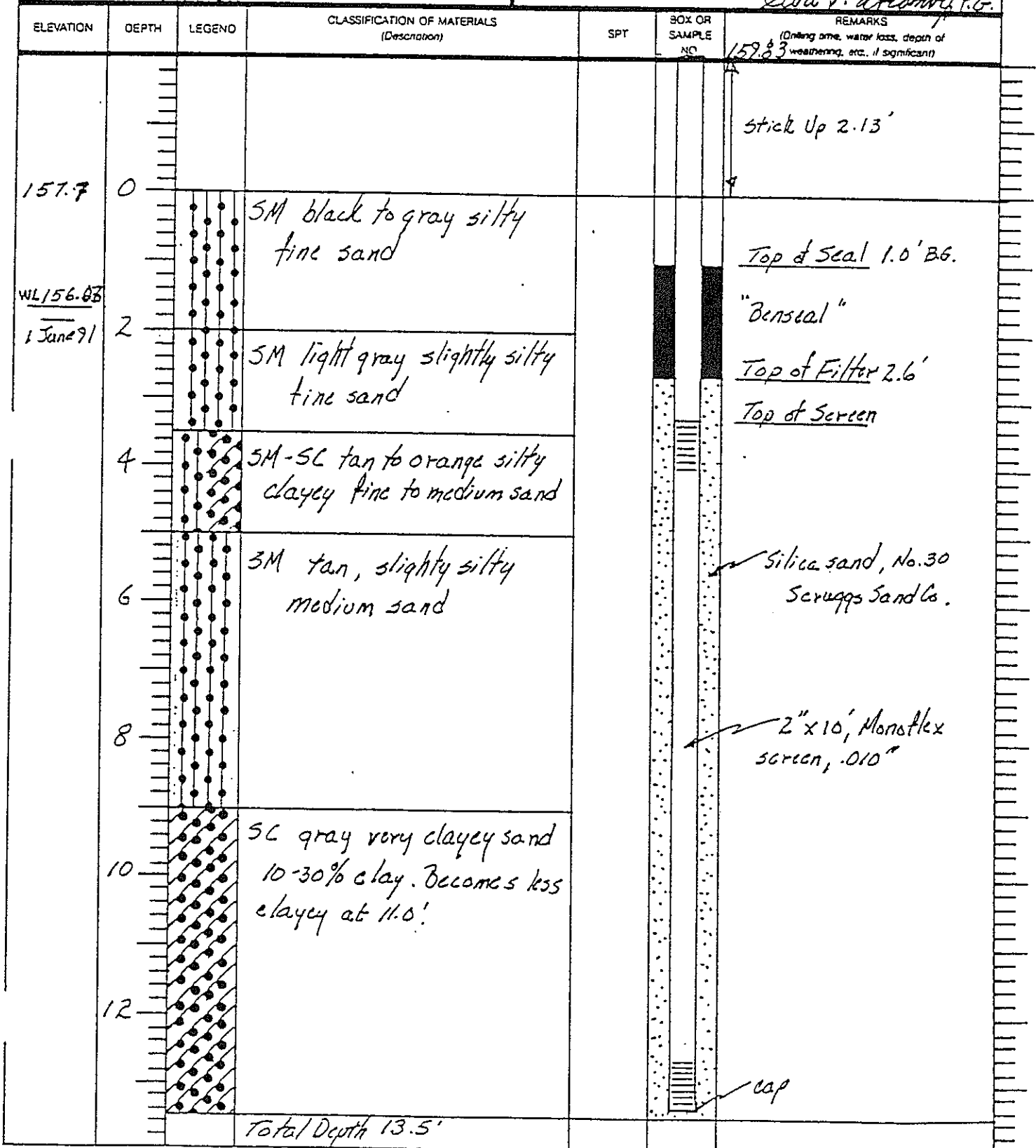
DRILLING LOG	COMPANY <i>MANOR TIMBER Co</i>	INSTALLATION <i>ARGYLE GA.</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>NE corner old pond</i>	SIZE AND TYPE OF BIT <i>5" auger</i>		
DRILLING AGENCY <i>EFT INC</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>3 May 91</i>	COMPLETED <i>3 May 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>155.8'</i>		
TOTAL DEPTH OF HOLE <i>15.0'</i>	ELEVATION GROUND WATER <i>155.59' 1 June 91</i>		
NAME OF DRILLER <i>MINTON</i>	SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb</i>		



DRILLING LOG	COMPANY <i>MANOR TIMBER CO</i>	INSTALLATION <i>ARGYLE, GA</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>E. of pond - near MW 2</i>	SIZE AND TYPE OF BIT <i>5" Auger</i>		
DRILLING AGENCY <i>EFT INC</i>	TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN <i>NA</i>	DATE HOLE	STARTED <i>3 May 91</i>	COMPLETED <i>3 May 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>	ELEVATION TOP OF HOLE <i>156.7' msl</i>		
TOTAL DEPTH OF HOLE <i>10.6'</i>	ELEVATION GROUND WATER <i>155.96 1 June 91</i>		
NAME OF DRILLER <i>MINTON</i>	SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb</i>		

ELEVATION	DEPTH	LEGEND	CLASSIFICATION OF MATERIALS (Description)	SPT	BOX OR SAMPLE NO	REMARKS (Drilling time, water loss, depth of weathering, etc., if significant)
						<i>158.49</i>
						<i>stick up 1.79'</i>
<i>156.7</i>	<i>0</i>		<i>SC mottled orange-red gray clayey sand</i>			
<i>155.96</i>			<i>SM gray silty sand</i>			<i>Top of Seal 1.0'</i>
<i>1 June 91</i>			<i>SM gray silty medium to fine sand</i>			<i>"Benseal"</i>
	<i>2</i>		<i>SM gray silty medium to fine sand</i>			<i>Top of Filter 2.2'</i>
	<i>4</i>		<i>SM-SC gray silty-clayey fine to medium sand.</i>			<i>Top of Screen 3.1'</i>
	<i>6</i>					<i>No 30 silica sand Scruggs Sand Co.</i>
	<i>8</i>					<i>2" PVC, .010" slot</i>
	<i>10</i>					<i>cap</i>
			<i>Total Depth 10.6'</i>			

DRILLING LOG		COMPANY <i>MANOR TIMBER CO</i>	INSTALLATION <i>ARGYLE GA.</i>	SHEET OF 1 SHEETS
LOCATION (Coordinates or Station) <i>73 NW of old road</i>		SIZE AND TYPE OF BIT <i>5" hand auger</i>		
DRILLING AGENCY <i>EFT INC</i>		TOTAL NO. OF OVERBURDEN SAMPLES TAKEN		
THICKNESS OF OVERBURDEN <i>NA</i>		DATE HOLE	STARTED <i>4 May 91</i>	COMPLETED <i>4 May 91</i>
DEPTH DRILLED INTO ROCK <i>NA</i>		ELEVATION TOP OF HOLE <i>157.7 msl</i>		
TOTAL DEPTH OF HOLE <i>13.5</i>		ELEVATION GROUND WATER <i>156.03, 1 June 91</i>		
NAME OF DRILLER <i>MINTON</i>		SIGNATURE OF INSPECTOR OR GEOLOGIST <i>Earl F. Titcomb, P.G.</i>		



Appendix B4

Ground Water Flow and Rate

Contouring of data taken from 1991 to 1996 confirms that changes in gradient occur at Manor Timber Company during periods of heavy winter rain. This change in gradient direction had previously been noted; however, the data now available confirms that these changes do occur. The 24 Nov 91 contours shown on Figure E-1 shows a gradient away from the waste management area (WMA) in a northeast, north, southeast, and south direction based primarily on the gradients measured between wells MW15 (AB4) and MW2, and MW3A and MW3. Although no data points existed at that time west of MW4A (on the western limit of the WMA) it appeared there may have been a gradient toward the west. Later, especially in January 1992, very heavy rains occurred in the area (see Table E-1) and contouring of data from 20 Feb 1992 (Figure E-2) shows flow toward the WMA from every direction. Two additional wells, MW9 and MW10, were added in early February, northeast and southeast respectively of the WMA. These wells along with the MW15 (AB4)-MW2 and MW3A-MW3 well pairs showed inward flow gradients toward the WMA. The AB5-MW1A pair has shown flow toward the WMA throughout this entire period and up to the present. During spring the rainfall was lower than in January, and by early June there was a partial reversal of gradient. By 23 June all flow from the WMA as measured from the four well pairs; MW16 (AB3)-MW9, MW15 (AB4)-MW2, MW6-MW10 and MW3A-MW3 was again away from the WMA. This outward gradient has continued up to present, and the installation of MW13 west of the WMA also indicates a gradient, although much lower, generally in a westerly direction. The ground water contours for 15 July 1995 and 21 January 1995 are shown on Plates E-1 and E-2, respectively. As noted above, the gradient at the northwest corner, as reflected by AB5 and MW1A has always been toward the WMA (see Table E-2). The relatively heavy summer rains, as experienced in June, July, and August 1992 did not create the flow reversal effect of the winter rains, probably due to evaporation and transpiration. Water level data for the 1991 through 1996 period is contained in Tables E-3 found at the end of this subsection.

TABLE E--2

MANOR TIMBER COMPANY
GRADIENT CALCULATIONS AB5 TO MWIA

DATE	AB - 5 WATER LEVEL	MWIA- WATER LEVEL	DIFFERENCE	GRADIENT
1 Jun 91	156.03	155.71	.32	.005
13 Sept 91	154.53	154.43	.10	.001
2.7 Oct 91	153.19	153.04	.15	.002
11 Nov 91	152.56	152.40	.16	.002
24 Nov 91	152.26	152.04	.22	.003
3 Feb 92	157.69	156.34	.35	.005
20 Feb 92	156.96	156.53	.43	.006
2 June 92	155.12	154.49	.63	.009
23 June 92	156.50	155.34	1.16	.017
24 July 92	155.97	154.78	1.19	.018
31 Aug 92	155.30	154.89	.41	.006
15 Oct 92	154.29	153.86	.43	.006

Ground water flow determinations for the period 17 Feb 1987 through 12 May 1990 are contained in Appendix C, "Slug Tests, Water Levels, and Sampling Procedures at Manor Timber Company, Clinch County, Georgia." This report, by Paul N. Clawson, revised in July 1990, shows the ground water flow varying seasonally "from 30° north of east to 200 south of east." These flow directions are essentially the same as found in contouring the water table elevations from 15 July 1995 (see Plate E-1). The new data points have resulted in a more complex picture than that based on earlier data. The January 1995 data shown on Plate E-2 indicates flow toward the northeast and west (not shown on some of the earlier interpretations). It was also noted in the July 1990 report that flow, during the period that the pond was in operation, was toward the south and southeast. Due to the above noted changes, rates of movement from (or towards) the closed impoundment are highly variable. Using the southward gradient from MW5 to MW8, .003, and the K value, determined from slug tests, of 3.25 feet/day, and assuming an average effective porosity of .25, and substituting in the formula $V = Ki/N$ we get:

$$V = \frac{3.25 \times .003 \times 365}{\text{feet/year} \cdot .25} = 14.2$$

This value compares well with the actual approximate horizontal movement of naphthalene in both the easterly and southerly directions. The plume boundary appears to be near MW8 or about 250 feet from the southern margin of the closed impoundment. This well has had very low levels of naphthalene, but in the last events there were no constituents found above detection limit. Using the figure calculated above and multiplying by the years since the impoundment was first used (20) gives a maximum distance of 284 feet. However, since we have seen flow reversals in at least three directions this past year, it is not reasonable to assume a constant gradient. The close agreement between the measured and calculated values is likely coincidence.

The contamination south of the WMA may also be a reflection of the ground water flow when the impoundment was in operation. At the present time, there appears to be only a small component of flow in a southerly direction. There is generally a southwesterly gradient, but there is little data to confirm or refute this supposition. MW13, on the western edge of the plant area has generally indicated a very low gradient from MW4A or MW4B, since its installation in May 1992. However, during the last three sets of water level data from July 1995 through April 1996, there has been a slight gradient toward the west. MW4B is located about 20 feet horizontally from the recovery well MW4A and may reflect drawdown due to pumping of this well.

The installation of MW17 and the conversion of AB3 and AB4 to monitoring wells MW16 and MW15, respectively, has not changed the interpretation of ground water flow, but has revealed that the northern boundary has more contamination than previously thought. This is discussed in paragraph 3.C. of this subsection.

Appendix B5

GEORGIA
ENVIRONMENTAL PROTECTION DIVISION

HAZARDOUS WASTE MANAGEMENT PROGRAM
GROUNDWATER TESTING
APPENDIX IX

GEORGIA MODIFIED STANDARD METHOD

Revised February 1991
DEPARTMENT OF NATURAL RESOURCES

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INTRODUCTION

Development of EPD Guidance For App. VIII (IX) Groundwater Testing

When a facility's monitoring wells have failed the contamination indicator tests it is a reasonable assumption that some toxic compound has entered the groundwater. However, very little is known about the nature of the compound and how much is present. The industry is faced with testing for some 250 toxic substances and will be regulated, at considerable cost, based on the levels found. Additionally, health-based drinking water limits are now specific for many chemicals and are set very low. There is, therefore, an immediate need to assure that the test procedures are reliable, that they indicate what is actually coming from the site, and that the levels found are true concentrations.

In 1985 when groundwater testing became an urgent issue many of the standard tests had never been verified for the additional compounds on the Appendix VIII list. Mounting a sampling and testing project of this size was unprecedented, and it was found that some established methods, while useful for a few suspected chemicals, presented problems when used for large groups. Such things as false positive results, especially around the lower detectable limits, incorrect identification, and the possibility of overlooking a chemical, caused concern among many experienced analytical chemists working in the field. EPA Manual SW846 did not cover these special problems, but addressed individual chemical analysis.

In order to assist industries under compliance orders the Georgia EPD developed a comprehensive test plan designed to achieve the greatest number of verified results in the most cost effective manner, and in the shortest possible time. It was a careful selection of methods calculated to overcome as many problems as possible, and was offered to industry as the Georgia Modified Standard Method (GMSM) in early 1985. This plan was approved by EPA Region IV and distributed to other states. Following this the Georgia EPD was awarded a Federal Grant to test out the GMSM in the field to determine what problems, if any, still existed with this method.

Since that time many of the ideas and theories proposed in the GMSM have been corroborated. However, some problems still exist, and the methods continue to be improved to overcome interferences, and to reach the health based drinking water limits. The GMSM revision which follows is based on an improved EPA Manual SW846 Edition III dated November, 1986 and updates. The Division stresses that the GMSM may not be the only acceptable plan but any plan submitted for approval must be of equivalent quality.

Method Selection

The 250 compounds of Appendix IX fall out into general groups, many of which are readily testable by established procedures:

- a) Gas Chromatographic (GC) Methods have long been standardized and are very good for many pesticides. The new pesticides required for Appendix IX were added to these GC Methods.
- b) Metals analyses can be performed by ICP to save time (and therefore money). The Atomic Absorption (AA) Method using Graphite Furnace yields the most sensitive test, and in the situation of testing contaminated groundwater, it should be used to provide the lowest detection limits. Due to interferences which may be present the GMSM leaves the choice of method to the analytical chemist.
- c) The cyanide and sulfide tests are standard in Manual SW 846 III. The EPD considers that "potentially dissociable" cyanides are potentially toxic. The agency also maintains surveillance of the quantity of bound (non-dissociable) iron cyanide and Method 9010 determines both of these.
- d) The Chlorinated Dioxins, and Furans tests require EPA Method 8290 in order to achieve the low detection limits mandated by extreme toxicity.
- e) The formaldehyde test is one the Division has been concerned with because of the prevalence of this chemical in industrial waste. The method which the Division requires was adapted and improved within the Georgia EPD, based on available literature.

The remaining chemicals are organics including solvents, oils, cleaners etc. and it is here that the testing of large groups provides the greatest difficulty:

- f) The list of volatile organic compounds can be scanned very effectively by the GC-MS (Mass Spectrometer), and with a wide or narrow bore capillary column can achieve very low detection limits (Method 8260, see page 9). This instrument can positively identify a compound in one test run. It may be possible to use other methods, however, the lower detectable limits may not be comparable in all cases.
- g) The same can be said for the much larger list of semi-volatile compounds. (see page 22, Method 8270) Some of these compounds are difficult to analyze for at best, and the assignment of method in manual SW 846, Edition III may be revised at a future time.

References to tentativeness can also be found in the footnotes contained in the Appendix IX Federal Register (July 9, 1987). Note that for 79 of these organic compounds only the GC-MS methods (8240, 8270) have been verified sufficiently to be recommended. For other compounds more than one method is listed, however one of the lower detection limits may be too high to be useful in this situation. Recent advances have established Method 8260 as superior to Method 8240 and should be used for groundwater.

In any test plan an important factor is the positive identity of the contaminant. Under an Appendix IX testing project any organic positive found by another method must be confirmed by the GC-MS instrument if possible as stated in the Manual SW846 III methods.

Additionally, in any test plan the lower detectable limit of the method selected should be an important factor. For example, it is not useful to report a lower limit of 100 ppb when the health based limit for drinking water is 10 ppb. For some exotic compounds it is not yet possible to test in the range of the health-based standard, and the technology is limited to verifying that a contaminant is not present to the lowest achievable level.

At the present time the lowest test limits listed in Manual SW846 III for groundwater will be a criterion for judging acceptable work. At such time as specific limits are published by EPA for Appendix IX testing these will be adopted by EPD.

In presenting the following test plan the Division is providing what it considers the best compromise between lower detection limits and positive identification. The GSM reflects the recommendations of Chapter Two and Chapter Eleven of Manual SW846. Any plan submitted for approval must provide equal sensitivity.

Laboratory Selection

The facility should bear in mind that the large list of unknowns presents unique test problems for the analyst and it is advisable to select a lab that is experienced in this aspect of laboratory testing. In other groundwater test situations, when a contaminant is known to be a member of a small group, a method can be selected which may be cheaper and quicker in that situation. (Refer to Chapter Two, 2.2.5, and figure 2.2 of Manual SW846 III).

The industry should also be aware that occasionally parts of the Appendix IX work may be subcontracted by the laboratory. The Division has no objection to this providing required holding times are maintained. However, the facility is advised that this could cause delays in shipment and cold storage which can alter the integrity of the sample. There may also be little knowledge about the quality control procedures of the subcontractor and these should be verified.

EPD does not have a lab. certification program and the industry should investigate the available laboratories and determine what course it wishes to pursue. The following are some questions which may be helpful:

- a. What is your general quality control program plan? Submit recent test data on lower detectable limits, spike recoveries, duplicates, and method blanks. How are you determining your lower detectable limit for organics in groundwater?
- b. Submit a quality assurance plan for my wells. Explain exactly how you will verify your test results.

- c. Do you have the instruments to perform the work by approved methods? Do you intend to subcontract part of the work? If so provide verification of their qualifications and QA-QC.
- d. Will you sample the wells? Have you received training from EPA or Georgia EPD on correct technique? Do you have a copy of the EPD Monitoring Well Sampling Procedure?
- e. Are you familiar with the required preservation and holding time limits for my groundwater samples?
- f. Do you have a copy of SW 846 Edition III? Are you familiar with the chapters on Quality Control and Method Selection, and will you carry out the QC measures stipulated in the methods and report them? Are you aware of the new holding times (Chapter Eleven, groundwater)?
- g. Do you have on hand all standards required for the Appendix IX tests?
- h. Provide the names of some customers whom you have recently done business with in groundwater testing. Have you previously performed a complete Appendix IX project?
- i. Do you participate in any testing of known samples provided by EPA or a State? Furnish copies of evaluations.
- j. If you are certified under any environmental program, describe and provide date of most recent approval.

GEORGIA MODIFIED STANDARD METHOD

1. When it is established in a facility's groundwater monitoring system that a statistically significant increase has occurred in the indicator parameters, it becomes necessary to determine the concentration of all hazardous compounds listed in Chapter 391-3-11-.10, Part 264, Appendix IX of the Georgia Rules. Refer to appropriate regulations Part 264 and 270.
2. The Georgia EPD requires that the list of Chemicals adopted in the Hazardous Waste Management Act as Appendix IX be tested along with any additions published subsequently by the US EPA. The Division retains the authority to add compounds which it considers applicable to a particular case.
3. The Third Edition of EPA Manual SW 846 dated November 1986, and any updates, shall be used for this testing. The generator and the selected laboratory are directed specifically to the chapters "Quality Control" and "The Correct Procedure," and to chapter eleven on "Groundwater." This manual provides guidance for both wastes and water, and the method procedures and standards applying to groundwater shall be used, except where discretionary changes or additions have been approved by Georgia EPD as indicated in the following sections.
4. Per the Federal Register 7/9/87 and manual SW846 III EPD has grouped the required compounds under the procedures which are considered most likely to yield the fewest false positives, and also provide lower detectable limits (LDL's) which are close to the health-based standards for drinking water. When searching for so many unknown compounds, these procedures are judged to overcome serious co-elution problems and provide the most accurate identification of contaminants without the need to resample and retest.
5. When groundwater interferences are present the analytical chemist is requested to select another approved method and retest, in order not to report excessively high, and therefore meaningless lower detectable limits. The Division will require this second method when it is known to exist, and this contingency should be built into the test plan. The need for deviation should be justified in the report.
6. Reporting
An example report form has been provided at the end of this document. All information listed should be provided as applicable for the method. The laboratory should sign the Statement of Certification included on page 2 of the Report Form.

7. The following is a summary of recommended procedures. All compounds listed under each procedure have yielded good results (refer to page 20):

- Procedure 1 GC-MS
 Volatile Compounds
 Purge and Trap, Method 8260 for groundwater.
- This test is best performed with a wide-bore (or narrow bore) capillary column. The Division advises that these should be employed.
- Procedure 2 GC - Method 8015 for 3 compounds
- Procedure 3 GC-MS
 Extractable acid compounds
 Extractable base/neutral compounds
 Method 8270 (Capillary Column)
- Procedure 4 GC
 a)Pesticides by Electron Capture
 Organochlorine Method 8080
- b)Herbicides by Electron Capture
 Acid derivative Method 8150
- c)Pesticides by Flame Photometric Detector
 Organophosphorus Method 8140
- Procedure 5 AA, ICP, Cold Vapor
 Metals
 AA Furnace Method 7000
 ICP Method 6010
 Cold Vapor Method 7470, 7441
- Procedure 6 Cyanides, total and amenable
 Method 9010
- Procedure 7 Sulfide
 Method 9030
- Procedure 8 Formaldehyde
 Derivitization Method, GC-MS Confirmation
 (See Appendix III).
- Procedure 9 Dioxins
 Method 8290 (requires HRGC-HRMS)
- Procedure 10 Fluoride
 Method 129-71W (EPD Lab.)

DESCRIPTION OF REQUIREMENTS
FOR SELECTED METHODS

I. Organic Analyses

The analytical chemist is referred to Method 8000 for general information, and then to the specific methods for quality control requirements applying to groundwater.

The laboratory shall use proven instruments and techniques to identify and quantify the listed volatile, semi-volatile, and pesticide compounds. The laboratory shall extract and concentrate sample extracts to achieve required detection limits using the approved methods.

The Internal Standard Calibration shall be used throughout. The samples shall be spiked as described and the recoveries reported in the lab report.

Volatile analyses shall be performed within 7 days of collection. All organic sample extractions shall be performed within 5 days of collection. (one extra day for shipment if needed.) Other organic analyses should be completed within 30 days of receipt in the laboratory. These dates of collection, receipt, and testing shall be reported in the lab report.

Calibration (GC-MS)

- (a) The GC-MS instrument shall be tuned daily on DFTPP and BFB.
- (b) Linearity of response shall be determined using 5 concentrations of the internal standards.
- (c) Each 12 hours a single midpoint check is to be run to determine whether it is within limits.

Surrogate standards shall be added to each sample blank and matrix spike before purging or extracting to monitor the preparation.

All volatile extracts and semi-volatile extracts shall also be spiked with internal standards before purging or injecting. These are listed in the method.

Qualitative verification shall be made according to 2 criteria:

- (a) GC retention time (RRT) is the same as the standard. The sample RRT must compare within 0.06 RRT units with the standard RRT. The standard must be run within the same 12 hour period.

- (b) The GC-MS spectrum of the sample is the same as the standard. The standard spectra must have been obtained on the laboratory's instrument, and can be used only after the instrument has been tuned using DFTPP and BFB per the method requirement.

Quantitation shall be performed using the internal standard method and utilizing a response factor (RF) as required in the procedure. The standard of the identified compound must be run before and after the sample, and a comparison made to determine concentration in the sample. The RF must be within 20% of the RF used for quantitation.

All pesticides identified in the required procedures shall be confirmed by GC-MS. Toxaphene, Chlordane and PCB Aroclor standards shall each be separate standard solutions.

One spiked downgradient sample (matrix spike) analysis shall be performed per each 20 samples run. If this spike is on the subject sample this shall be reported since recoveries are especially meaningful for that facility. A minimum of 12 of the semi-volatiles shall be run as a matrix spike.

A library search shall be executed for other organic compounds for the purpose of tentative identification. The EPA/NIH Mass Spectral library shall be used. Substances with responses less than 10% of the internal standard need not be reported. An estimated concentration may be made using the nearest internal standard free of interferences. This shall be reported as "estimated".

Method Blank

A blank shall be run through all procedures, and reported.

When no target compound is found report the method detection limit and also the instrument detection limit for that run.

All Quality Control work including blank, matrix spike and surrogate recovery shall be reported for each procedure. Additionally report the lower detection limit achieved for clean water.

Lower Detection Limit (LDL)

A list of required lower detection limits on clean water without interferences is provided. Some compounds required by the Division may not yet have an established limit. In this case report the limit found.

These limits are compiled from the SW 846, III Methods and the EPA Contract Lab Program established under Superfund. They are reasonable levels and in many cases can be improved.

Instrument Detection Limit (IDL)

This is essentially 3 times the noise.

1. Run the standard curve.
2. Run seven reagent water blanks and calculate the standard deviation (S) of the responses.

$$\text{Average } (\bar{X}) = \frac{\sum X}{7} \qquad S = \sqrt{\frac{\sum_{i=1}^7 (\bar{X} - X_i)^2}{6}}$$

3. Determine the level on the standard curve which is 3 times the standard deviation (S). This is the instrument detection limit.

Method Detection Limit (MDL)

1. Prepare a spike of the analyte into reagent water that corresponds to the calculated Instrument Detection Limit. It should be as close as possible to this limit.
2. Take 7 aliquots and process each through the sample work-up.
3. Analyze and determine concentration in the usual manner.
4. Calculate the standard deviation (S) as above.
5. The MDL = $t_{.99S}$
= 3.143(S) for 7 aliquots.

NOTE:

If the subject sample contains interferences and requires a dilution, adjust the reported MDL to include this dilution.

Interferences

When a compound is found to interfere in the prescribed method, and the detection limit is raised by dilution so as to obscure other listed compounds, the GSM requires that the sample be tested by another EPA approved method which will overcome the interference if the method exists. This condition shall be noted in the lab report with the name of the alternate method. Reporting of extremely high LDL's when another approved method is known will not be acceptable to the Division.

Reagent Blank

1. For the common lab. solvents the reagent blank must not contain more than 2x the required detection limit. These are: Methylene Chloride, Acetone, Methyl Ethyl Ketone, 1,4 Dioxane.

2. For the common phthalate esters the reagent blank must not contain more than 2x the required detection limit.
3. For all other organics the reagent blank should contain less than the required detection limit.
4. If the reagent blank has been subtracted to arrive at the result, this fact must be noted in the report.

RECOVERY LIMITS

Acceptable recovery limits for Surrogate Standards and Matrix Spikes are as follows:

SURROGATE SPIKE RECOVERY LIMITS

Fraction	Surrogate Compound	Well Water %
VOA	Toluene-d ₈	86-119
VOA	4-Bromofluorobenzene	85-121
VOA	1,2-Dichloroethane-d ₄	77-120
BNA	Nitrobenzene-d ₅	41-120
BNA	2-Fluorobiphenyl	44-119
BNA	p-Terphenyl-d ₁₄	33-128
BNA	Phenol-d ₅	15-103
BNA	2-Fluorophenol	23-121
BNA	2,4,6-Tribromophenol	10-130
Pest.	Dibutylchloroendate	48-136

MATRIX SPIKE RECOVERY LIMITS

Fraction	Matrix Spike Compound	Well Water %
VOA	1,1-Dichloroethene	61-145
VOA	Trichlorethene	71-120
VOA	Chlorobenzene	75-130
VOA	Toluene	76-125
VOA	Benzene	76-127
BN	1,2,4-Trichlorobenzene	39- 98
BN	Acenaphthene	46-118
BN	2,4-Dinitrotoluene	24- 96
BN	Di-n-butyl Phthalate	11-117
BN	Pyrene	26-127
BN	N-Nitroso-Di-n-Propylamine	41-116
BN	1,4-Dichlorobenzene	36- 97
Acid	Pentachlorophenol	9-103
Acid	Phenol	12- 89
Acid	2-Chlorophenol	27-123
Acid	4-Chloro-3-Methylphenol	23- 97
Acid	4-Nitrophenol	10- 80
Pest.	Lindane	56-123
Pest.	Heptachlor	40-131
Pest.	Aldrin	40-120
Pest.	Dieldrin	52-126
Pest.	Endrin	56-121
Pest.	4,4'-DDT	38-127

HAZARDOUS SUBSTANCES
REQUIRED METHOD DETECTION LIMITS

Clean Well Water

Volatiles	Wide Bore ug/L	Narrow Bore ug/L
Acetone	10.0	
Benzene	0.04	0.03
Bromochloromethane	0.04	0.09
Bromodichloromethane	0.08	0.03
Bromoform	0.12	0.20
Bromomethane	0.11	0.06
2 Butanone	10.0	
Carbon tetrachloride	0.21	0.02
Chlorobenzene	0.04	0.03
Chloroethane	0.10	0.02
2 Chloroethyl Vinyl Ether	10.0	
Chloroform	0.03	0.04
Chloromethane	0.13	0.05
Dibromochloromethane	0.05	0.07
1,3 Dibromoethane	0.06	0.10
Dibromomethane	0.24	0.01
Dichlorodifluoromethane	0.10	0.11
1,1 Dichloroethane	0.04	0.03
1,2 Dichloroethane	0.06	0.02
1,1 Dichloroethene	0.12	0.05
Cis 1,2 Dichloroethene	0.12	0.06
Trans 1,2 Dichloroethene	0.06	0.03
1,3 Dichloropropane	0.04	0.08
1,2 Dichloropropane	0.04	0.02
2,2 Dichloropropane	0.35	0.08
1,1 Dichloropropene	0.10	0.12
Cis 1,3 Dichloropropene	5.0	
Trans 1,3 Dichloropropene	5.0	
Ethyl benzene	0.06	0.03
2 Hexanone	10.0	
Isopropyl benzene	0.15	0.10
4 Methyl - 2 - Pentanone	10.0	
Styrene	0.04	0.27
1,1,2,2 Tetrachloroethane	0.04	0.20
1,1,1,2 Tetrachloroethane	0.05	0.07
Tetrachloroethene	0.14	0.05
Toluene	0.11	0.08
1,1,1 Trichloroethane	0.08	0.04
1,1,2 Trichloroethane	0.10	0.08
Trichloroethene	0.19	0.02
Trichlorofluoromethane	0.08	0.07
1,2,3 Trichloropropane		0.09
Vinyl Acetate	10.0	
Vinyl Chloride	0.17	0.04
P-Xylene	0.13	0.06
m-xylene	0.05	0.03
o-xylene	0.11	0.06

Semi-Volatiles (Extractables)	Detection Limits
	Well Water ug/l
N-Nitrosodimethylamine	10
Phenol	10
Aniline	10
bis (2-Chloroethyl) ether	10
2-Chlorophenol	10
1,3-Dichlorobenzene	10
1,4-Dichlorobenzene	10
Benzyl Alcohol	10
1,2-Dichlorobenzene	10
2-Methylphenol	10
bis (2-Chloroisopropyl)ether	10
4-Methylphenol	10
N-Nitroso-Dipropylamine	10
Hexachloroethane	10
Nitrobenzene	10
Isophorone	10
2-Nitrophenol	10
2,4-Dimethylphenol	10
Benzoic Acid	50
bis (2-Chloroethoxy) methane	10
2,4-Dichlorophenol	10
1,2,4-Trichlorobenzene	10
Naphthalene	10
4-Chloroaniline	10
Hexachlorobutadiene	10
4-Chloro-3-methylphenol (para-chloro-meta-cresol)	10
2-Methylnaphthalene	10
Hexachlorocyclopentadiene	10
2,4,6-Trichlorophenol	10
2,4,5-Trichlorophenol	50
2-Chloronaphthalene	10
2-Nitroaniline	50
Dimethyl Phthalate	10
Acenaphthylene	10
3-Nitroaniline	50
Acenaphthene	10
2,4-Dinitrophenol	50
4-Nitrophenol	50
Dibenzofuran	10
2,4-Dinitrotoluene	10

Semi-Volatiles (Extractables) Cont'd	Detection Limits
	Well Water ug/l
2,6-Dinitrotoluene	10
Diethylphthalate	10
4-Chlorophenyl Phenyl ether	10
Fluorene	10
4-Nitroaniline	50
4,6-Dinitro-2-methylphenol	50
N-nitrosodiphenylamine	10
4-Bromophenyl Phenyl ether	10
Hexachlorobenzene	10
Pentachlorophenol	50
Phenanthrene	10
Anthracene	10
Di-n-butylphthalate	10
Fluoranthene	10
Benzidine	80
Pyrene	10
Butyl Benzyl Phthalate	10
3,3'-Dichlorobenzidine	20
Benzo(a)anthracene	10
bis(2-ethylhexyl)phthalate	10
Chrysene	10
Di-n-octyl Phthalate	10
Benzo(b)fluoranthene	10
Benzo(k)fluoranthene	10
Benzo(a)pyrene	10
Ideno(1,2,3-cd)pyrene	10
Dibenz(a,h)anthracene	10
Benzo(g,h,i)perylene	10
Pesticides	
alpha-BHC	0.05
beta-BHC	0.05
delta-BHC	0.05
gamma-BHC (Lindane)	0.05
Heptachlor	0.05
Aldrin	0.05
Heptachlor Epoxide	0.05
Endosulfan I	0.05
Dieldrin	0.10
4,4'-DDE	0.10
Eldrin	0.10
Endosulfan II	0.10

Pesticides Cont'd	Detection Limits
	Well Water ug/L
4,4'-DDD	0.10
Endrin Aldehyde	0.10
Endosulfan Sulfate	0.10
4,4'-DDT	0.10
Endrin Ketone	0.10
Methoxychlor	0.5
Chlordane	0.5
Toxaphene	1.0
ARCLOR-1016	0.5
ARCLOR-1221	0.5
ARCLOR-1232	0.5
ARCLOR-1242	0.5
ARCLOR-1248	0.5
ARCLOR-1254	1.0
ARCLOR-1260	1.0
Parathion	0.1
Silvex	0.1
2,4D	0.5
2,45T	0.5
Polychlorinated dibenzodioxins	0.01
Polychlorinated dibenzofurans	0.01

METALS

Antimony	60
Arsenic	10
Barium	200
Beryllium	5
Cadmium	5
Chromium	10
Cobalt	50
Copper	25
Iron	100
Lead	5
Mercury	0.2
Nickel	40
Selenium	5
Silver	10
Thallium	10
Tin	40
Vanadium	50
Zinc	20

REPORTED DETECTION LIMITS
FOR SPECIAL COMPOUNDS

The following have been achieved and are included as guidance for the analyst:

<u>Procedure 1 (VOA)</u>	<u>ug/l</u>
Acetonitrile	10
2 Chloro 1,3 butadiene (chloroprene)	5
3 Chloropropene	5
dibromomethane	5
dichlorodifluoromethane	5
Methacrylonitrile	5
 <u>Procedure 2</u>	
1,4 dioxane	150 (10 by HPT)
isobutyl alcohol	50
 <u>Procedure 3 (A/BN)</u>	
N nitrosomethyl ethylamine	10
isosafrole	10
Aniline	10
2 acetylamino fluorene	20
Benzidine	80
diphenylamine	10
dimethyl phenethylamine	10
2 sec butyl 4,6 dinitrophenol	20
Methyl methacrylate	10
N nitroso dimethylamine	10
2 picoline	10
m/p cresol	10
 <u>Procedure 4 (Pesticides by GC)</u>	
Tetra ethyl dithio pyrophosphate (Sulfotepp)	7
Kepone	0.06
Isodrin	0.01
Endosulfan sulfate	0.10
Dimethoate	2

STANDARD SOLUTIONS

VOLATILES

Internal Standards

Bromochloromethane
1,4-difluorobenzene
Chlorobenzene d-5

Surrogates

Toluene-d₈
4-bromofluorobenzene
1,2 dichloroethane-d₄

Matrix Spiking Solution

Chlorobenzene
Toluene
Benzene

1,1-Dichloroethene
Trichloroethene

SEMI-VOLATILE, EXTRACTABLES

Internal Standards

1,4-Dichlorobenzene-d₄
Naphthalene-d₈
Acenaphthene-d₈
Phenanthrene-d₈
Chrysene-d₁₂
Perylene-d₁₂

Surrogates

Phenol-5
2-Fluorophenol
2,4,6-Tribromophenol
d-5 Nitrobenzene
2-Fluorobiphenyl
Terphenyl

Matrix Spiking Solutions

Base/Neutrals

1,2,4-Trichlorobenzene
Acenaphthene
2,4-Dinitrotoluene
Di-n-butyl Phthalate
Pyrene
N-Nitroso-Di-n-Propylamine
1,4-Dichlorobenzene

Acids

Pentachlorophenol
Phenol
2-Chlorophenol
4-Chloro-3-Methylphenol
4-Nitrophenol

QUANTITATION OF ANALYTES ASSIGNED
TO THE INDICATED INTERNAL STANDARDS

VOLATILES

<u>Bromochloromethane</u>	<u>1,4-Difluorobenzene</u>	<u>Chlorobenzene-d₅</u>
Chloromethane	2-Butanone	2-Hexanone
Bromomethane	1,1,1-Trichloroethane	4-Methyl-2-Pentanone
Vinyl Chloride	Carbon Tetrachloride	Tetrachloroethene
Chloroethane	Vinyl Acetate	1,1,2,2-Tetrachloroethane
Methylene Chloride	Bromodichloromethane	Toluene
Acetone	1,2-Dichloropropane	Chlorobenzene
Carbon Disulfide	trans-1,2-Dichloropropene	Ethylbenzene
1,1-Dichloroethene	Trichloroethene	Styrene
1,1-Dichloroethane	Dibromochloromethane	Total Xylenes
trans-1,2-Dichloroethene	1,1,2-Trichloroethane	Bromofluorobenzene
Chloroform	Benzene	(surr)
1,2-Dichloroethane	cis-1,3-Dichloropropene	Toluene-d ₈ (surr)
1,2-Dichloroethane-d ₄ (surr)	2-Chloroethyl Vinyl Ether	
	Bromoform	

SEMI-VOLATILE, EXTRACTABLES

<u>4-Dichlorobenzene-d₄</u>	<u>Naphthalene-d₈</u>	<u>Acenaphthene-d₁₀</u>	<u>Phenanthrene-d₁₀</u>	<u>Chrysene-d₁₂</u>	<u>Perylene-d₁₂</u>
N-Nitrosodimethyl-amine	Nitrobenzene	Hexachlorocyclopentadiene	4,6-Dinitro-2-methylphenol	Benzidine	Di-n-oct
Phenol	Isophorone	2,4,6-Trichlorophenol	N-nitrosodiphenylamine	Pyrene	Phthalat
Aniline	2-Nitrophenol	2,4,5-Trichlorophenol	1,2-Diphenylhydrazine	Butylbenzyl Phthalate	Benzo(b)anthen
bis(2-Chloroethyl) ether	Benzoic acid			3,3'-Dichlorobenzidine	Benzo(k)anthen
2-Chlorophenol	bis(2-Chloroethoxy)methane	2-Chloronaphthalene	4-Bromophenyl Phenyl Ether	Benzo(a)-anthracene	Benzo(a)Indeno(1
1,3-Dichlorobenzene	2,4-Dichlorophenol	2-Nitroaniline	Hexachloro'benzene	bis(2-ethylhexyl)-Phthalate	-pyrene
1,4-Dichlorobenzene	1,2,4-Trichlorobenzene	Dimethyl Phthalate	Pentachloro-phenol	Chrysene	Diabenz(a)anthracen
Benzyl Alcohol		Acenaphthylene	Phenanthrene		
1,2-Dichlorobenzene	benzene	3-Nitroaniline		Terphenyl-d ₁₄ (surr)	Benzo(g,h)Perylene
anthracene	Naphthalene	Acenaphthene			
2-Methylphenol		2,4-Dinitrophenol			
bis(2-Chloroisopropyl)ether	4-Chloroaniline		Anthracene		
4-Methylphenol	Hexachlorobutadiene	4-Nitrophenol	Di-n-butyl Phthalate		
N-nitroso-Di-n-propylamine	4-Chloro-3-methylphenol	Dibenzofuran	Fluoranthene		
Hexachloroethane	2-Methylnaphthalene	2,4-Dinitrotoluene			
2-Fluorophenol (surr)	Nitrobenzene-d ₅ (surr)	2,6-Dinitrotoluene			
nl-d ₅		Diethyl Phthalate			
		4-Chlorophenyl phenyl ether			
		Fluorene			
		4-Nitroaniline			
		2-Fluorobiphenyl (surr)			
		2,4,6-Tribromo Phenol (surr)			

II. METALS ANALYSES

The analytical chemist is referred to method 7000 for general information and then to specific methods for quality control.

ICP (Method 6010) and Atomic Absorption (Furnace method Method 7000) from EPA Manual SW 846, III should be used. For Mercury the cold vapor method 7470 must be employed on an Atomic Absorption instrument or specially designed Mercury detector pre-approved by the Division.

The AA Furnace method is most sensitive. However, ICP is more interference-free. The choice of method is left to the analyst with the stipulation that the lowest possible detection limits should be achieved for the situations encountered.

- a) Run one blank per sample batch. Do not subtract the blank.
- b) Spike one downgradient sample from the facility being tested, and report percent recovery.

Do this for each metal tested.

- c) Run the set of check standards after every 15 samples.
- d) For any metal not detected report the Method lower detectable limit for that test.

METALS - Required Detection Limits

	<u>ug/l</u>
Antimony	60
Arsenic	10
Barium	200
Beryllium	5
Cadmium	5
Chromium	10
Cobalt	50
Copper	25
Iron	100
Lead	5
Mercury	0.2
Nickel	40
Selenium	5
Silver	10
Thallium	10
Tin	40
Vanadium	50
Zinc	20

- e) Samples should be preserved on site with HNO_3 to pH less than 2 and may be held until convenient to test.
- f) The regulations presently require evaluations based on total metals tests. If any attempt is made to determine dissolved metals in addition to total metals consult the guidance in Appendix I. The standard filtration does not yield acceptable results.

III. CYANIDE, TOTAL AND AMENABLE

Method 9010 (Manual SW 846, III)

- a) The colorimetric or semi-automated spectrophotometric method should be used to achieve a lower detection limit in the range of 0.02mg/l.
- b) Determine sulfide presence before running this test. If sulfide is present distill all standards per section 7.5 of the method.

If sulfide is not present distill 2 standards per section 7.4.2. If the readings do not agree with the curve by more than 10%, an error is present. It must be found and corrected before proceeding.
- c) Run one blank per sample batch. Do not subtract the blank.
- d) One of the downgradient samples must be spiked with a known quantity. Report percent recovery.
- e) When no cyanide is detected report the lower detection limit for the test.
- f) Holding time for a preserved sample is 14 days maximum. If sulfide is present the analysis must be performed within 24 hours. Preservative is sodium hydroxide to pH 12 and cooling to 4°C.

IV. FORMALDEHYDE

An acceptable procedure is available from the Division. It is a DNPH derivative formation at mild pH which has been researched and tentatively verified by USEPA. (See Appendix III)

LIST OF REQUIRED COMPOUNDS

All chemicals listed in Part 264, Appendix IX are required to be tested.

Procedure 1

GC-MS, Purge & Trap
Volatile Compounds

Method 8260

The Division advises that the use of a wide-bore capillary column with this method overcomes many previous problems and provides better resolution.

Acetonitrile (or 8015)	
Acrolein	
Acrylonitrile	
Acetone	
Benzene	
Bromodichloromethane	
Bromoform (tribromomethane)	
Methyl Bromide (Bromomethane)	
Carbon disulfide	
Chlorobenzene	
Chlorodibromomethane	
Chloroethane	
Chloromethane	
2-Chloroethyl vinyl ether	
Chloroform	
3-Chloropropene (Allyl Chloride)	
2-Chloro 1,3-butadiene (Chloroprene)	
1,2-dibromo-3-chloropropane (DBCP)	
1,2-Dibromoethane (ethylene dibromide)	
Dibromomethane	
1,4-Dichloro-2-butene	
Dichlorodifluoromethane	
1,1-Dichloroethane	
1,2-Dichloroethane	
Trans-1,2-dichloroethylene	
1,1-Dichloroethylene (vinylidene Chloride)	
Methylene Chloride (dichloromethane)	
1,2-Dichloropropane	
	cis 1,3 Dichloropropene
	trans 1,3 Dichloropropene
	ethyl Benzene
	Iodomethane
	Isobutyl Alcohol
	MEK (2 butanone)
	MIBK (Methyl isobutyl ketone)
	Methyl normal butyl ketone (2 Hexanone)
	Methacrylonitrile
	Methyl Methacrylate
	Ethyl Methacrylate
	Pentachloroethane
	Propionitrile
	Pyridine
	2 Picoline (2 methyl pyridine)
	Styrene
	1,1,1,2-Tetrachloroethane
	1,1,2,2-Tetrachloroethane
	Tetrachloroethene
	Carbon Tetrachloride
	Toluene
	1,1,2-Trichloroethane
	1,1,1-Trichloroethane
	Trichloroethylene (trichloroethene)
	Trichlorofluoromethane
	1,2,3-Trichloropropane
	Vinyl acetate
	Vinyl chloride
	Xylene (total)
	Ethylene glycol monoethyl ether
	2 Nitropropane

Procedure 2

An alternative method 8015 using GC is listed for 3 compounds as follows:

1,4 Dioxane	- lower limit 150 ug/l
Methyl Ethyl Ketone	- lower limit 10 ug/l
Isobutyl Alcohol	- lower limit 50 ug/l
Acetonitrile	

The Division will accept results for these compounds if this method is employed. However, all of the above have been tested using Method 8260 with wide-bore capillary column (Procedure 1) and may be included in that method thus saving additional expense.

NOTE: The analyst is advised that extreme care with the common laboratory solvents must be exercised to prevent lab contamination from the air while testing for all volatile compounds (procedure 1 and 2) at these very low levels.

Procedure 3

GC-MS acid/base neutral

Method 8270
Capillary Column

Acenaphthene	
Acenaphthalene	
Acetophenone	
2-Acetylaminofluorene	
4-Aminobiphenyl	
Anthracene	
Aniline	
Aramite	
Benz(a)anthracene	
1,4Benzenediamine (phenylenediamine)	
Benzo(k)fluoranthene	
Benzo(b)fluoranthene	
Benzo(g,h,i)perylene	
Benzo(a)pyrene	
p-Benzoquinone	
Benzylalcohol	
bis(2-chloroethoxy)methane	
bis(2-chloroethyl)ether	
2,2'-Dichloro disopropyl ether	
bis(2-ethylhexyl)phthalate	
4-Bromophenyl phenyl ether	
Butyl benzyl phthalate	
p-Chloroaniline	
Chlorobenzilate	
dichlorobenzene o,m, & p	
4-chlorophenyl phenyl ether	
2-Chloronaphthalene	
Chrysene	
Diallate	
Dibenz(a,h)anthracene	
Dibenzofuran	
Di-n-butyl phthalate	
3,3'Dichlorobenzidine	
3,3'Dimethylbenzidine	
Diethyl phthalate	
Dimethoate	
p-Dimethylaminoazobenzene	
7,12-Dimethylbenz(a)anthracene	
alpha-alpha-Dimethylphenethylamine	
Dimethyl phthalate	
m-Dinitrobenzene	
Phenanthrene	
Pronamide	
Pyrene	
Safrole	
1,2,4,5-Tetrachlorobenzene	
O, Toluidine	
1,2,4-Trichlorobenzene	
	2,4-Dinitrotoluene
	2,6-Dinitrotoluene
	Di-n-octyl phthalate
	Diphenylamine
	Ethyl Methane Sulfonate
	Fluoranthene
	Fluorene
	Hexachlorobenzene
	Hexachlorbutadiene
	Hexachlorocyclopentadiene
	Hexachloroethane
	Hexachlorophene
	Hexachloropropene
	Indeno(1,2,3-cd)pyrene
	Isophorone
	Isosafrole
	Methapyrilene
	3-Methylcholanthrene
	Methyl methanesulfonate
	2-methylnaphthalene
	Naphthalene
	1,4-Naphthoquinone
	1-Naphthylamine
	2-Naphthylamine
	2-Nitroaniline
	3-Nitroaniline
	p-Nitroaniline
	Nitrobenzene
	4-Nitroquinoline-1-oxide
	N-Nitrosodi-n-butylamine
	N-Nitrosodiethylamine
	N-Nitrosodimethylamine
	N-Nitrosomethylethylamine
	N-Nitrosodiphenylamine
	N-Nitroso dipropylamine
	N-Nitrosomorpholine
	N-Nitrosopiperidine
	Nitrosopyrrolidine
	5-Nitro-o-toluidine
	Pentachlorobenzene
	Pentachloronitrobenzene
	Phenacetin

Acid

2-Chlorophenol
o,m,p Cresol
4 Nitrophenol
p-Chloro-m-cresol
2,4 Dichlorophenol
2,6 Dichlorophenol
2,4 Dimethylphenol
4,6-Dinitro-o-cresol
2,4-Dinitrophenol
Pentachlorophenol
Phenol
2,4,5-Trichlorophenol
2,4,6-Trichlorophenol
2,3,4,6 tetrachlorophenol
2-nitrophenol

Procedure 4

GC Pesticides and Herbicides

Organochlorine, Method 8080 GC-EC

(Confirm positives by GC-MS)

Aldrin	Aroclor 1016
Isodrin (aldrin isomer)(also 8270)	Aroclor 1221
Chlordane	Aroclor 1232
DDD	Aroclor 1242
DDE	Aroclor 1248
DDT	Aroclor 1254
Dieldrin	Aroclor 1260
Endosulfan I	
Endosulfan II	
Endosulfan sulfate	
Endrin	
Endrin aldehyde and ketone	
Heptachlor	
Heptachlor epoxide	
Alpha-BHC	
Beta-BHC	
Gamma-PHC (Lindane)	
Delta-BHC	
Kepone	
Methoxychlor	
Toxaphene	

Herbicides, Chlorinated Acid Derivatives Method 8150 GC-EC

2,4D
2,4,5-T
2,4,5-TP
Dinoseb, DNBP

Organophosphorus Method 8140 GC-FP

Disulfoton
Methyl Parathion
Parathion
Sulfotepp, (tetraethyl dithiopyrophosphate)
Famphur, (phosphorothioic acid ester)
Phorate, (phosphorodithioic acid ester)
Dimethoate

Procedure 5

Toxic Metals

AA Furnace Method (Refer to Method 7000)
ICP Method 6010
Cold Vapor Method 7470 for Mercury

Antimony
Arsenic
Barium
Beryllium
Cadmium
Chromium
Cobalt
Copper
Lead
Mercury
Nickel
Selenium
Silver
Thallium
Tin
Vanadium
Zinc

Procedure 6

Cyanide, total and amenable

Method 9010

This test determines any bound cyanide and potentially dissociable (therefore toxic) cyanide.

Procedure 7

Sulfide

Method 9030

This test determines any toxic sulfide containing compound.

Procedure 8

Formaldehyde - DNPH derivitization with liquid chromatography.
GC-MS confirmation. See Appendix III.

Procedure 9

Chlorinated Dioxins and Furans - Method 8290, Latest Revision, SW 846, III

2378 TCDD (required if tetra CDD is positive)
tetra CDD
tetra CDF
Penta CDD
Penta CDF
Hexa CDD
Hexa CDF

Procedure 10

Fluoride Method 129-71W. (Clean Water Act)

This test determines any free fluoride.

APPENDIX IX
 Holding Times and Preservation for Groundwater

<u>Parameter</u>	<u>Recommended Container</u>	<u>Preservative</u>	<u>Maximum Holding Time</u>	<u>Minimum Volume Required For Analysis</u>
pH	T, P, G	Field Determined	None	25 mL
Specific Conductance	T, P, G	Field Determined	None	100 mL
TOC	G, Teflon-lined Cap	Cool 4°C, HCl to pH<2	28 Days	4 x 15 mL
TKN	G, amber, Teflon-lined Cap	Cool 4°C, add 1 mL of 1.1M Sodium Sulfite	7 Days	4 x 15 mL
Endrin Lindane Methoxychlor Toxaphene 2,4 D 2,4,5 TP Silvex	T, G	Cool, 4°C	7 Days	2,000 mL
Cyanide	P, G	Cool, 4°C, NaOH to pH > 12	14 Days (24 hours if sulfide)	500 mL
Oil and Grease	G only	Cool, 4°C H ₂ SO ₄ to pH:2	28 Days	100 mL
Semivolatiles	T, G, teflon lined cap	Cool, 4°C	5 Days to Extract, - 30 days *	1,000 mL
Volatile Organics		Cool, 4° C	7 Days Complete	
Radium Gross Alpha Gross Beta	P, G	Field Acidified to pH < 2 with HNO ₃	6 Months	1 gallon
Coliform Bacteria	PP, G (Sterilized)	Cool, 4°C	6 Hours	200 mL
Sulfide	P, G	Cool, 4°C, add Zinc Acetate Plus Sodium Hydroxide to pH 9	7 Days	

T= teflon G=Glass
P=polyethylene pp= polypropylene

*- 30 days for complete test (GLP limit).
40 days maximum if special conditions warrant.

<u>Parameter</u>	<u>Container</u>	<u>Preservative</u>	<u>Maxim Holding</u>
Phenols (Semivolatile)	G, Teflon-lined Cap	Cool, 4°C, 0.008% Na ₂ S ₂ O ₃	5 Days Extract
Benzidines	G, Teflon-lined Cap	Cool, 4°C, 0.008% Na ₂ S ₂ O ₃	5 Days Extract
Phthalate Esters	G, Teflon-lined Cap	Cool, 4°C	5 Days Extract
Nitrosamines	G, Teflon-lined Cap	Cool, 4°C, Store In Dark, 0.008% Na ₂ S ₂ O ₃	5 Days Extract
PCBs, acrylonitrile	G, Teflon-lined Cap	Cool, 4°C	5 Days Extract
Nitroaromatics and isophorone	G, Teflon-lined Cap	Cool, 4°C, 0.008% Na ₂ S ₂ O ₃ Store In Dark	5 Days Extract
Polynuclear Aromatic Hydrocarbons	G, Teflon-lined Cap	Cool, 4°C, 0.008% Na ₂ S ₂ O ₃ Store In Dark	5 Days Extract
TCDD	G, Teflon-lined Cap	Cool, 4°C, 0.008% Na ₂ S ₂ O ₃	5 Days Extract
Pesticides	G, Teflon-lined Cap	Cool, 4°C, pH 5-9	5 Days Extract (14 days)
Chromium VI	P, G	Cool, 4°C	24 Hours
Mercury	P, G	HNO ₃ to pH 2	28 Days
Metals, Except Chromium VI and Mercury	P, G	HNO ₃ to pH 2	3 Months

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APPENDIX IX

GROUNDWATER MONITORING LIST *

<u>Common Name</u>	<u>GMSM Procedure</u>
Acenaphthene	3
Acenaphthylene	3
Acetone	1
Acetophenane	3
Acetonitrile; Methyl cyanide	1 or 2
2-Acetylaminofluorene; 2-AAF	3
Acrolein	1
Acrylonitrile	1
Aldrin	4
Allyl chloride	1
4-Aminobiphenyl	3
Aniline	3
Anthracene	3
Antimony	5
Aramite	3
Arsenic	5
Barium	5
Benzene	1
Benzo(a)anthracene; Benzanthracene	3
Benzo(b)fluoranthene	3
Benzo(k)fluoranthene	3
Benzo(ghi)perylene	3
Benzo(a)pyrene	3
Benzyl alcohol	3
Beryllium	5
alpha-BHC	4
beta-BHC	4
delta-BHC	4
gamma-BHC; Lindane	4
Bis(2-chloroethoxy)methane	3
Bis(2-chloroethyl)ether	3
2,2'Dichlorodiisopropyl ether	3
Bis(2-ethylhexyl phthalate	3
Bromodichloromethane	1
Bromoform; Tribromomethane	1
4-Bromophenyl phenyl ether	3
Butyl benzyl phthalate	3
Cadmium	5
Carbon disulfide	1
Carbon tetrachloride	1
Chlordane	4
p-Chloroaniline	3
Chlorobenzene	1
Chlorobenzilate	3
p-Chloro-m-cresol	3
Chloroethane; Ethyl chloride	1
Chloroform	1

<u>Common Name</u>	<u>GMSM Procedure</u>
2-Chloronaphthelene	3
2-Chlorophenol	3
4-Chlorophenyl phenyl ether	3
Chloroprene	1
Chromium	5
Chrysene	3
Cobalt	5
Copper	5
m-Cresol	3
o-Cresol	3
p-Cresol	3
Cyanide	3
2,4-D;2,4-Dichlorophenoxyacetic acid	4
4,4'-DDD	4
4,4'-DDE	4
4,4'-DDT	4
Diallate	3
Dibenz(a,h)anthracene	3
Diberzofuran	3
Dibromochloromethane; Chlorodibromomethane	1
1,2-Dibromo-3-chloropropane; DBCP	1
1,2-Dibromoethane; Ethylene dibromide	1
Di-n-butyl phthalate	3
o-Dichlorobenzene	3
o-dichlor	3
m-Dichlorobenzene	3
p-Dichlorobenzene	3
3,3'-Dichlorobenzidine	3
trans-1,4-Dichloro-2-butene	1
Dichlorodifluoromethane	1
1,1-Dichloroethane	1
1,2-Dichloroethene; Ethylene dichloride	1
1,1-Dichloroethylene; Vinylidene chloride	1
trans-1,2-Dichloroethylene	1
2,4-Dichlorophenol	3
2,6-Dichlorophenol	3
1,2-Dichloropropane	1
cis-1,3-Dichloropropene	1
trans-1,3-Dichloropropene	1
Dieldrin	4
Diethyl phthalate	3
0,0-Diethyl O-2-pyrazinyl phosphorothioate; Thionazin	3
Dimethoate	3
p-(Dimethylamino)azobenzene	3
7,12-Dimethylbenz(a)anthracene	3
3,3'-Dimethylbenzidine	3
alpha, alpha-Dimethylphenethylamine	3
2,4-Dimethylphenol	3
Dimethyl phthalate	3
Dimethyl Sulfate	3
Dimethyl hydrazine	
m-Dinitrobenzene	3

<u>Common Name</u>	<u>GMSM Procedure</u>
4,6-Dinitro-o-cresol	3
2,4-Dinitrophenol	3
2,4-Dinitrotoluene	3
2,6-Dinitrotoluene	3
Dinoseb; DNBP; 2-sec-Butyl-4,6-dinitrophenol	4
Di-n-octyl phthalate	3
1,4-Dioxane	2
Diphenylamine	3
Disulfoton	
Endosulfan I	4
Endosulfan II	4
Endosulfan sulfate	4
Endrin	4
Endrin aldehyde	4
Ethylbenzene	1
Ethyl methacrylate	1
Ethyl methanesulfonate	3
Famphur	
Fluoranthene	3
Fluorene	3
Heptachlor	4
Heptachlor epoxide	4
Hexachlorobenzene	3
Hexachlorobutadiene	3
Hexachlorocyclopentadiene	3
Hexachloroethane	3
Hexachlorophene	3
Hexachloropropene	3
2-Hexanone	1
Indeno (1,2,3-cd)pyrene	3
Isobutyl alcohol	2
Isodrin	4
Isophorone	3
Isosafrole	3
Kepone	3
Lead	5
Mercury	5
Methacrylonitrile	1
Methapyrilene	3
Methoxychlor	4
Methyl bromide; Bromomethane	1
Methyl chloride; chloromethane	1
3-Methylcholarthrene	3
Methylene bromide; Dibromomethane	1
Methylene chloride; Dichloromethane	1
Methyl ethyl ketone; MEK	1 or 2
Methyl iodide; iodomethane	1
Methyl methacrylate	1
Methyl methanesulfonate	3
2-Methylnaphthalene	3
Methyl parathion; Parathion methyl	4
4-Methyl-2-pentanone; Methyl isobutyl ketone	1

<u>Common Name</u>	<u>GMSM Procedure</u>
Naphthalene	3
1,4-Naphthoquinone	3
1-Naphthylamine	3
2-Naphthylamine	3
Nickel	5
o-Nitroaniline	3
m-Nitroaniline	3
p-Nitroaniline	3
Nitrobenzene	3
o-Nitrophenol	3
p-Nitrophenol	3
4-Nitroquinoline 1-oxide	3
N-Nitrosodi-n-butylamine	3
N-Nitrosodlethylamine	3
N-Nitrosodimethylamine	3
N-Nitrosodiphenylamine	3
N-Nitrosodipropylamine; Di-n-propyintitrosamine	3
N-Nitrosomethylethylamine	3
N-Nitrosomorphaline	3
N-Nitrosopiperidine	3
N-Nitrosopyrrolidine	3
5-Nitro-o-toluidine	3
Parathion	4
Polychlorinated biphenyls; PCBs	4
Polychlorinated dibenzo-p-dioxins; PCDDs	9
Polychlorinated dibenzofurans; PCDFs	9
Pentachlorobenzene	3
Pentachloroethane	1
Pentachloronitrobenzene	3
Pentachlorophenol	3
Phenacetin	3
Phenanthrene	3
Phenol	3
p-Phenylenediamine	3
Phorate	4
2-Picoline	1
Pronamide	3
Propionitrile, Ethyl Cyanide	1
Pyrene	3
Pyridine	1
Safrole	3
Selenium	5
Silver	5
Silvex; 2,4,5-TP	4
Styrene	1
Sulfide	7
2,4,5-T; 2,4,5-Trichlorophenoxyacetic acid	4
2,3,7,8-TCDD; 2,3,7,8-Tetrachlorodibenxo-p-dioxin	9
1,2,4,5-Tetrachlorobenzene	3
1,1,1,2-Tetrachloroethane	1
1,1,2,2-Tetrachloroethane	1
Tetrachloroethylene; Perchloroethylene; Tetrachloroethene	1

<u>Common Name</u>	<u>GSM Procedure</u>
2,3,4,6-Tetrachlorophenol	3
Tetraethyl dithiopyosphate; Sulfotepp	4
Thallium	5
Tin	5
Toluene	1
o-Toluidine	3
Toxaphene	4
1,2,4-Trichlorobenzene	3
1,1,1-Trichloroethane; Methylchloroform	1
1,1,2-Trichloroethane	1
Trichloroethylene; Trichloroethene	1
Trichlorofluoromethane	1
2,4,5-Trichlorophenol	3
2,4,6-Trichlorophenol	3
1,2,3-Trichloropropane	1
0,0,0-Triethyl phosphorothioate (Famphur)	
sym-Trinitrobenzene	
Vanadium	5
Vinyl acetate	1
Vinyl Chloride	1
Xylene (total)	1
Zinc	5

* This list is updated periodically and adopted by the Georgia General Assembly. The most recent list will be required.

MONITORING WELL SAMPLING PROCEDURE

The following demonstrates what is needed for good sample extraction. It can be adapted to the particular situation.

The greatest source of inadvertent sample contamination is through incorrect handling by field personnel. The sampler should keep in mind that the levels of concern are minute, as compared to a waste sample, and extreme care is needed. This will usually slow down the speed of sample collection, but the reliability of test results is increased proportionately.

Water standing in a well may not be a true representation of water quality in the aquifer. Changes in temperature and pressure, contact with air, and prolonged contact with well casing materials can all affect the chemical quality of the water. Therefore, before sampling, the well must be evacuated (purged).

WELL EVACUATION

Remember that any item coming in contact with the inside of the well casing or the well water should be kept in a clean container and handled only with gloved hands. Always start with the least contaminated well.

For wells with rapid recovery, which cannot be evacuated, 3 well volumes will be removed. This reflects the present technology in which the goal is to clear standing water without diluting any potential plume by drawing in pure water.

A. Assemble Equipment

1. Place a clean plastic sheet, such as a painter's drop cloth, around the well as a work area. Unlock protective well casing.
2. Bring a precleaned steel measuring tape and electric sounder to the plastic sheet. The sounder probe and tape have been precleaned in the lab and wrapped in foil. Unwrap without touching them.
3. Put on new gloves. Unlock and remove well cap. Place it top-down on a corner of the plastic sheet.

B. Calculate the volume of water to be evacuated:

1. Use the electric sounder ("m-scope") to measure the distance from top of the casing to top of water.
2. Use the clean steel tape to measure the distance from top of casing to the bottom of the well or use total depth data provided by company.

Appendix I

3. Subtract #1 from #2 to obtain the height (h) of the column of water in the well.
4. Multiply h times the appropriate conversion factor to obtain the volume of water in the well in gallons.
 - a. For a 2-inch inside diameter well,
 $h \times 0.1623 = \text{Volume (gal)}$
 - b. For a 4-inch inside diameter well,
 $h \times 0.6 = \text{Volume (gal)}$
5. Evacuate $3 \times \text{Volume (gal)}$ to obtain a representative sample.
6. Clean the steel measuring tape and electric sounder probe by rinsing with isopropanol followed by distilled water. Wrap in foil for use on the next well. Keep in mind that with undried instruments there is a slight chance isopropanol may interfere in the tests, necessitating a resampling. If acetone is used, be sure to allow all apparatus to dry thoroughly before proceeding to next well. (also see tape cleaning, p.39)

C. Evacuate the Well

1. Bring 2 dishpans and a measuring container to the plastic sheet and line one dishpan with aluminum foil.
2. Bring the bailer, which has been precleaned in the laboratory and wrapped in foil, to the plastic sheet. Unwrap it without touching the bailer.
3. Bring the spool of bailer cord to the sheet. This roll has also been covered with foil to keep it clean. Place it in the unlined dishpan and unwrap it without handling the rope.
4. At this point both bailer-handler and helper should put on a new pair of gloves.
5. The end of the bailer rope is tied to the top of the bailer. Use foil where needed to assure that the rope does not touch any item while in use.
6. The bailer is lifted and lowered carefully into the well until it is submerged.
7. The bailer is raised in a hand over hand manner and the rope is allowed to fall into the polyethylene dishpan lined with foil.

8. Pour groundwater from bailer into the measuring container. Repeat bailing procedure until a 3X volume (gal) (see B4 and 5) has been evacuated. If the bailer touches the container, line the lip with aluminum foil.
 9. If the well goes dry before 3 volumes is obtained, then sample when the well has recovered sufficiently to provide a sample volume. Some wells require 24 hours for recovery and settling.
 10. Save the evacuated water in the measuring container for proper disposal. Do not pour on the ground next to the well. Each sampling plan must include the method for disposal.
 11. The rope is untied from the bailer and the portion used is cut off for discard.
 12. The used gloves, the used rope, the bailer foil, dishpan foil and the plastic sheet are rolled up and discarded in the large trash bag provided.
- D. Proceed with sampling procedure, or if well requires a recovery period before sampling, replace well cap and lock protective casing.

WAITING PERIOD

Volatile and semi-volatile samples must be collected as soon as the well has recovered. If there is a sediment problem a waiting period of 24 hours maximum is allowed before collecting the metals samples.

SAMPLE COLLECTION

All tests will be required on unfiltered representative water. For dissolved metals discussion see next section.

The team should arrive at the site with ice already in place in the ice chests.

BAILED SAMPLES

1. Place a plastic sheet such as a painter's drop cloth, around the well as a work area, to prevent sample bottle contact with the ground. Unlock the protective well casing.
2. Bring 2 dishpans to the sheet and line one with aluminum foil.

3. Arrange sample bottles on the sheet. Place waste water container in vicinity of well.
4. Bring the bailer, which has been precleaned in the laboratory and wrapped in foil, to the plastic sheet. Unwrap it without touching the bailer.
5. Bring the spool of bailer cord to the sheet. This spool has also been covered generously with foil to keep it clean. Place it in the unlined dishpan and unwrap it without handling the rope.

Selection of inert rope is important. Never buy colored rope. New nylon rope is available from several manufacturers. Where organic contaminants are of interest it may be advisable to use teflon rope for the first 10 feet of cord and discard after each well. However, the value of this may be offset by the additional handling required.

6. Take a pair of gloves and unlock and remove the well-cap. Place it top-down on a corner of the plastic sheet.
7. At this point both bailer-handler and helper should put on a new pair of gloves.
8. The end of the bailer rope is tied to the top of the bailer. The rope must not touch anything but clean aluminum foil. Use foil where needed.
9. The bailer is lifted and lowered carefully into the well until it is submerged.
10. The helper will unscrew the appropriate sample bottle caps and place them top down on the plastic sheet without touching the interiors or dislodging any teflon discs inside the caps.
11. The bailer is raised in a hand over hand manner and the rope is allowed to fall into the polyethylene dishpan lined with foil. The first bailer-ful is discarded into a waste container.
12. The samples are poured into the bottles without bubbles, and are filled to the top without headspace. Do not allow any cord to touch the water. The helper can hold the bottle and be responsible for recapping without touching the interior of the cap, and screwing down tightly. It is not good practice to leave samples in the sun. They should be removed to the ice chest as soon as possible.
13. The organic samples are the most delicate and should be collected first. A sample for volatile analysis must be filled so that the vial has a meniscus. The cap is slid over it and closed so that no bubble can be seen when the sample vial is upended. The volatile samples are always collected in pairs.

The other organics usually require two or three 1-liter bottles without preservative and these should be collected next, also without headspace.

If a sample is to be collected for dissolved metals it will not have preservative and should be collected next. If there is a sediment problem this sample should be collected right after the volatile samples in order to minimize the sediment requiring removal. Alternatively, wait 24 hours before collecting metals samples.

Finally, preserved samples should be collected, taking great care that the acids and salts in the bottles do not contact the helper's gloves and thus pass to other caps and bottles.

Do not allow the bailer to touch any sample bottles, or allow any rope end or gloved fingers to contact the sample well water while pouring.

14. All remaining sample bottles should now be carried to the ice chest where they are labeled, placed in zip-loc bags, and iced down.
15. The labels can be pre-filled out leaving less work and time delay at the site.

The label must have:

Name of facility
Date of sampling and time
Sample description (monitoring well ID and "up" or "down")
Sampler's name

Additionally, mark each sample bottle with an identification number using red glass-marking crayon which is resistant to water. Bottle caps are good places to add an I.D. This is a precaution in case labels get wet or come off during transport.

16. The well cap is replaced and locked. Lock the protective well casing.
17. The rope is untied from the bailer and all used rope is discarded.
18. The used gloves, the used rope, the bailer foil, dishpan foil and the plastic sheet are rolled up and discarded in the large trash bag provided.
19. Proceed to the next well and repeat.

NOTE: It is good practice to take an extra set of sample bottles to the field in case of breakage or accidental contamination.

BAILER CLEANING

The best procedure is one bailer for one well. However, when this is not possible a single bailer may be cleaned between wells as follows:

1. The sampler, without removing gloves, will untie the rope and will open the bailer to allow the helper to pour distilled water into and around the bailer. This will be shaken and poured out.
2. The helper will then pour spectrograde isopropanol into and around the bailer. It is again shaken and poured out.
3. A final rinse is now performed with distilled water in copious amounts into and around the bailer. This should be done more than once.
4. A fresh piece of aluminum foil is placed on the plastic sheet and the bailer is placed in it. The foil is folded around the bailer for carrying.
5. It is important to sample the upgradient wells first and then proceed to the more contaminated wells.
6. The bailer is then returned to the laboratory for a thorough cleaning with alkonox and distilled water rinse, and foil wrapping.

NOTE 1: For wells that are contaminated with insoluble wastes field cleaning is not recommended.

NOTE 2: If isopropanol appears in the test, a resampling will have to be done.

STEEL MEASURING TAPE CLEANING

NOTE:

For badly contaminated wells it is not advisable to attempt to field-clean a tape and use it on a second well. It should be thoroughly scrubbed and rinsed with distilled water in the laboratory.

1. Steel tapes that are coated with teflon or nylon are the easiest to clean.
2. Have on hand 2 hand-held sprayers connected to 3 gallon containers and a source of tap water.
3. Prepare a dilute liquinox and water solution for addition to one sprayer.
4. Fill the second sprayer with distilled water.

5. The tape can be sprayed as it comes out of the well: First with liquinox solution, then rinsed in tap water and finally a copious spraying with distilled water. This will require 2 people to handle equipment.
6. Alternatively the tape can be immersed in liquinox solution, then rinsed in clear water, and finally sprayed with distilled water. The soap is a good solvent for oils but must be thoroughly removed.
7. The tape may also be cleaned like the bailer using isopropanol.
8. The clean tape should be wrapped in aluminum foil for carrying.

SPLIT SAMPLES

For most accurate results the parallel splitting procedure should be used.

Parallel Split

1. The 2 sample bottles for a given Parameter are lined up and caps removed.
2. One bailer-ful is poured into one bottle, and the next bailer-ful is poured into the other bottle, alternating until the 2 sample bottles are full. They are then capped as usual. If the bailer water is homogeneous then 1/2 bailerful is poured into each bottle.
3. The 2 sample bottles for another test are then lined up, and filled as in 2).
4. This procedure is continued until all test bottles for a given well are filled for both parties.

The parallel split will provide the most accurate indication of what is in the groundwater because it avoids excessive handling. Occasionally it may be desired to verify the work of the laboratory, or the field technique. In this case, a common bottle may be used. It should be understood that the common bottle will serve to create two very similar samples at the expense of possible loss or gain of contaminants through the additional sample handling.

Common Bottle Split

1. A receiving bottle large enough (1 gallon) to hold two sets of samples for a given parameter is needed, (one or two bottles for each well).
2. Water should be poured without bubbles, and the receiving bottle should be rotated for homogeneity but in no case splashed or jostled in any way.
3. Samples should be poured from the bottle in pairs for each parameter (1 metals for you, 1 metals for me, etc.).

4. Use a glass receiving bottle for organics and a polyethylene bottle for metals. Pre-rinse the bottle with well water and discard the water.

SAMPLING FOR METALS

The facility will be required to test for "total metals," and the Division will regulate based on these results.

Every effort should be made to install the wells correctly so that the water samples will be clear. Sediment remaining after developing and purging, is undesirable since it is not possible to know whether dissolved metals have temporarily adsorbed to the particles. Present studies indicate that metals movement in the aquifer is a series of dissolving and adsorbing phenomena. Therefore, it is not advisable to perform a filtration. It is also believed that the filtration procedure itself will alter the integrity of the sample.

In order to prevent metal adsorption onto container walls acid preservative is added. This acid could cause some dissolving of metals in the soil sediment which are not a part of groundwater contamination, if these metals happen to be present. It is not possible to make a comparison of various upgradient and downgradient sediments since the quantities vary independently from sample to sample.

For the foregoing reasons, and until such time as USEPA provides further guidance, a total metals test will be required. However, the Division will allow the water to settle in the well for 24 hours, if needed, before collecting the metals sample. This sample must be preserved with acid.

A facility may elect to perform tests on filtered samples. The use of glass or cellulose in the filtration has been shown to both contribute and remove metals. The Division advises that teflon or teflon coated apparatus including the filter disk should be used on unpreserved water. No glass or polyethylene should contact the samples prior to filtration. They should be collected from a teflon bailer into a teflon bottle, and filled to the top without headspace. Filtration should be performed within 24 hours into a preservative-containing flask.

THE TOTAL METALS SAMPLE

1. The sample shall not be permitted to contact glass prior to acidification.
2. A 500 ml glass sample bottle containing sufficient nitric acid for a pH less than or equal to 2 shall be filled, labeled, and placed on ice.
3. If sufficient well water is available the bailer should be rinsed in well water before collecting the sample.

THE BLANK

A 500 ml blank should be run with distilled water collected in the same manner as the well water. Report the blank results.

THE SAMPLE CONTAINER

1. The use of glass for organic chemicals and polyethylene for metals is a general precautionary measure in use today for minimizing adsorption to container walls. This is especially important for unpreserved samples. Teflon bottles are most inert but are very expensive.
2. The gases dissolved in groundwater such as carbon dioxide and nitrogen produce a certain acidity. Additionally volatile chemicals tend to escape from the liquid. Therefore good practice dictates filling the containers to the top without headspace for all pH sensitive materials and volatiles.

LABORATORY REPORT FORM
FOR
RCRA APPENDIX IX TESTING

PLEASE CERTIFY:

I am familiar with the contents of the Georgia Modified Standard Method, and have performed the quality control procedures described in the GSM and the EPA Manual SW846 Edition III for groundwater, on the samples in this report.

Signed: _____
Lab Manager

Date: _____

Analysis of Formaldehyde

Analysis of Formaldehyde

This method consists of forming the 2,4 Dinitrophenyl hydrazine derivative, and analysis by liquid chromatography with absorbance detection. The procedure has been found to measure free formaldehyde without triggering formation of formaldehyde from precursors which may be present. The concentration range is 0.015-1.4 ppm with a calculated method detection limit of 7 ug/l.

Apparatus

Liquid chromatography system with absorbance detector.
Column: 4.6x250 mm Zorbax ODS
Mobile phase: Methanol/water, 75/25
Flow Rate: 1.0 ml/min.
Detector at 360 nm

Reagents

1 mg/ml 2,4 Dinitrophenylhydrazine in ethanol.

5M Acetate buffer
Saturated sodium chloride solution
Spectrograde Methylene Chloride
C18 sorbent (J.T. Baker Chemical Co. acceptable)
Formaldehyde Standard

Procedure

1. Liquid samples are filtered using a centrifuge and glass fiber filter.
(Not groundwater)
2. 100 ml sample is buffered by adding 4 ml of 5M acetate buffer.
3. 6 ml of 1 mg/l Dinitrophenyl hydrazine solution (in ethanol) is added.
4. Place on a wrist action shaker for 30 minutes at room temperature.
5. After 30 minutes 10 ml of saturated NaCl solution is added.
6. The derivative is now extracted from the solution into Methylene Chloride.

The Methylene Chloride solution is concentrated using a Kuderna-Danish concentrator and a solvent exchange into Methanol is performed.

Alternatively, instead of Methylene Chloride, a reverse phase solid sorbent extraction can be used and the sorbent eluted with ethanol. This may avoid occasional emulsion formation in Methylene Chloride. Experimenters have found that equivalent recovery can be obtained using 1.5 grams of C18 sorbent from the J.T. Baker Chemical Co. Three sorbents were evaluated and this one yielded the most satisfactory results. There may be other manufacturers.

7. The final volume (Methanol or Ethanol) is 10 ml. This is injected directly into a liquid chromatography system using a 20 ul injection.
8. The sample concentration is determined by injection of 3 specially prepared formaldehyde-DNPH standards to cover the expected range. The standards are buffered and synthesized in the same manner as the samples.

Comments

1. A distilled water blank should be run through the procedure to determine possible laboratory contamination.
2. A sample should be spiked and percent recovery reported.
3. Solid samples should be subjected to the Toxic Constituent Leaching Procedure (TCLP) using a PH5 acetate buffer. Results should be related back to the original weight of material as mg/kg.
4. When formaldehyde has been found in a groundwater sample under a general search for contaminants, the result should be confirmed by GC-MS.
5. This method raises the pH of derivative formation to 5, instead of the previous highly acid conditions, in order to avoid generation of formaldehyde during test preparation. The method was studied and verified by EPA research scientists working with Battelle Corp., Columbus, Ohio.¹

¹Paper presented, EPA Symposium on Solid Waste Testing, July 13, 1987

February 19, 2008

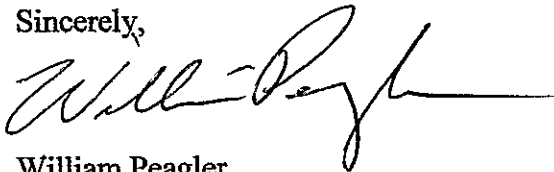
Georgia Department of Natural Resources
Environmental Protection Division
Hazardous Waste Management Branch
Attn: Mr. Tom Brodell
2 Martin Luther King, Jr. Drive SE
Suite 1154E
Atlanta, Georgia 30334-9000

Re: Notice Filed as Required by 40 CFR 264.119
Manor Timber Company, Inc.
Argyle, Clinch County, Georgia

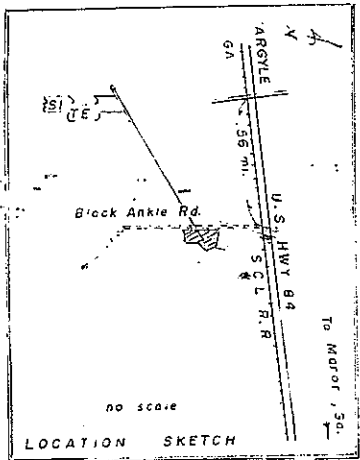
Dear Mr. Brodell:

In accordance with 40 CFR 264.119 we filed the attached notice on the Plat of the Closed Surface Impoundment with the Clerk of Superior Court of Clinch County, Georgia on December 29, 1988.

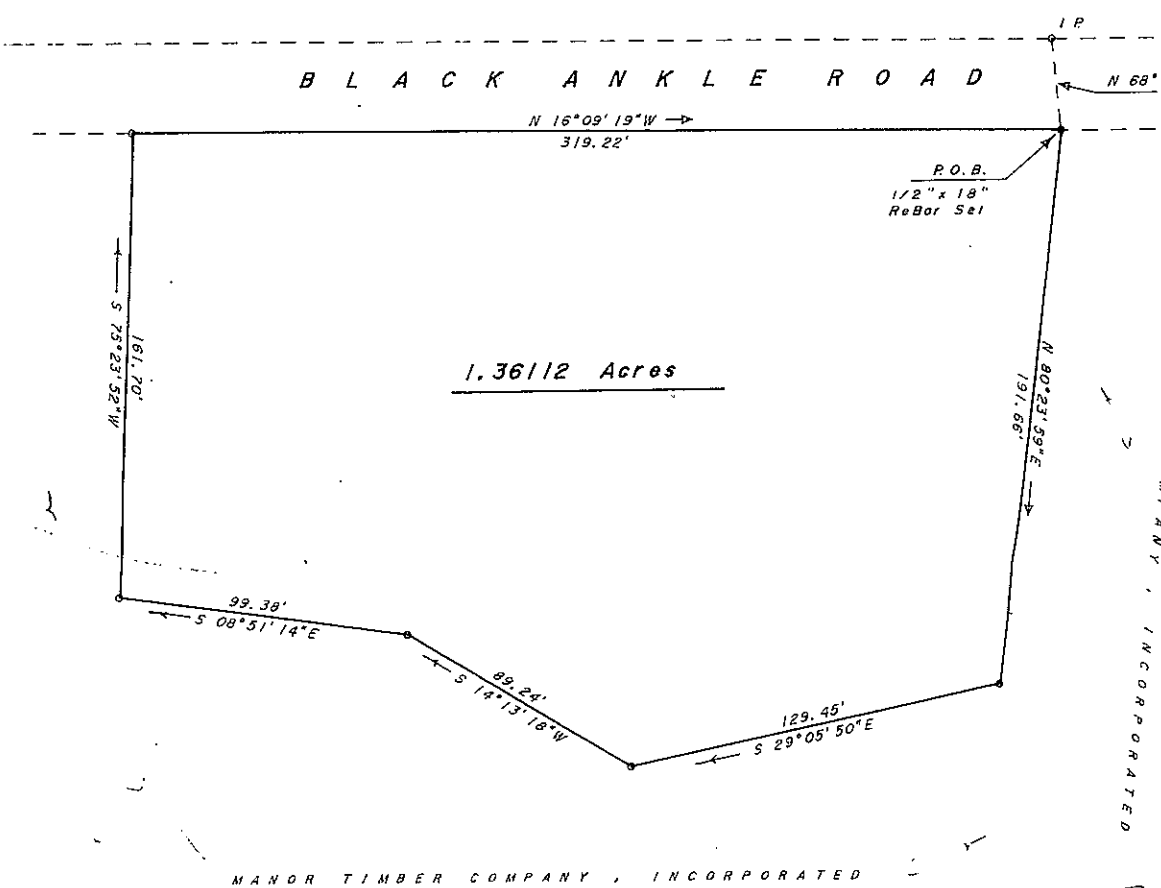
Sincerely,

A handwritten signature in black ink, appearing to read "William Peagler", with a long horizontal flourish extending to the right.

William Peagler
Owner - Manor Timber Company

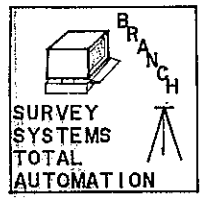


"MAG



THIS PLAT HAS BEEN RECORDED IN PLAT BOOK E
 PAGE 39 IN THE OFFICE OF THE CLERK OF THE
 SUPERIOR COURT OF CLATSOP COUNTY, GEORGIA
 THIS 29 DAY OF Dec, 1988 : TIME 11:15 A.M.
Janak Belle C. Booth
 CLERK OF THE SUPERIOR COURT

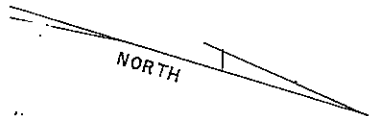
S U R V



MANOR TIMBER CO

L.L. 114 - 7th LAND DISTRICT - CLINCH

DATE : 12 DECEMBER 1988 - SCALE : 1



S 16° 52' 00" E
464.06'

30° E 31.00'

S 67° 14' W - 2695.11'
To South Ori. T. L. L. of - L. 413

To Argyle, Ga

Seaboard
(150' R/W)
Coastline

R. R.

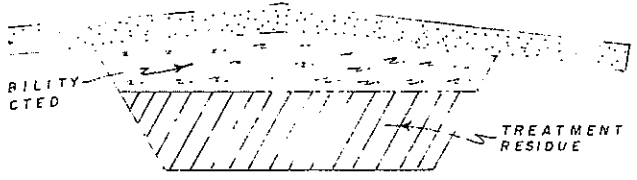
To Manor, Ga.

- N - O - T - E -

THE OWNER OF THE PARCEL OF LAND DEPICTED HEREON IS UNDER OBLIGATION TO RESTRICT DISTURBANCE OF SAID PROPERTY WHICH IS DESIGNATED AS A HAZARDOUS WASTE DISPOSAL UNIT ALL IN ACCORDANCE WITH THE APPLICABLE REGULATIONS IN SUBPART 6 OF PART 265, TITLE 40 OF THE CODE OF FEDERAL REGULATIONS

IN MY OPINION THIS PLAT IS A TRUE REPRESENTATION OF THE LAND PLATTED AND WAS PREPARED TO CONFORM WITH THE MINIMUM STANDARDS OF GEORGIA LAW.

CLOSURE: FIELD & PLAT 1" IN 10,000'
EQUIPMENT USED: TOPCON G5-10 Total Station



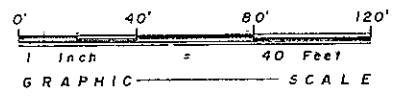
TYPICAL CROSS SECTION
NO SCALE

Y F O R

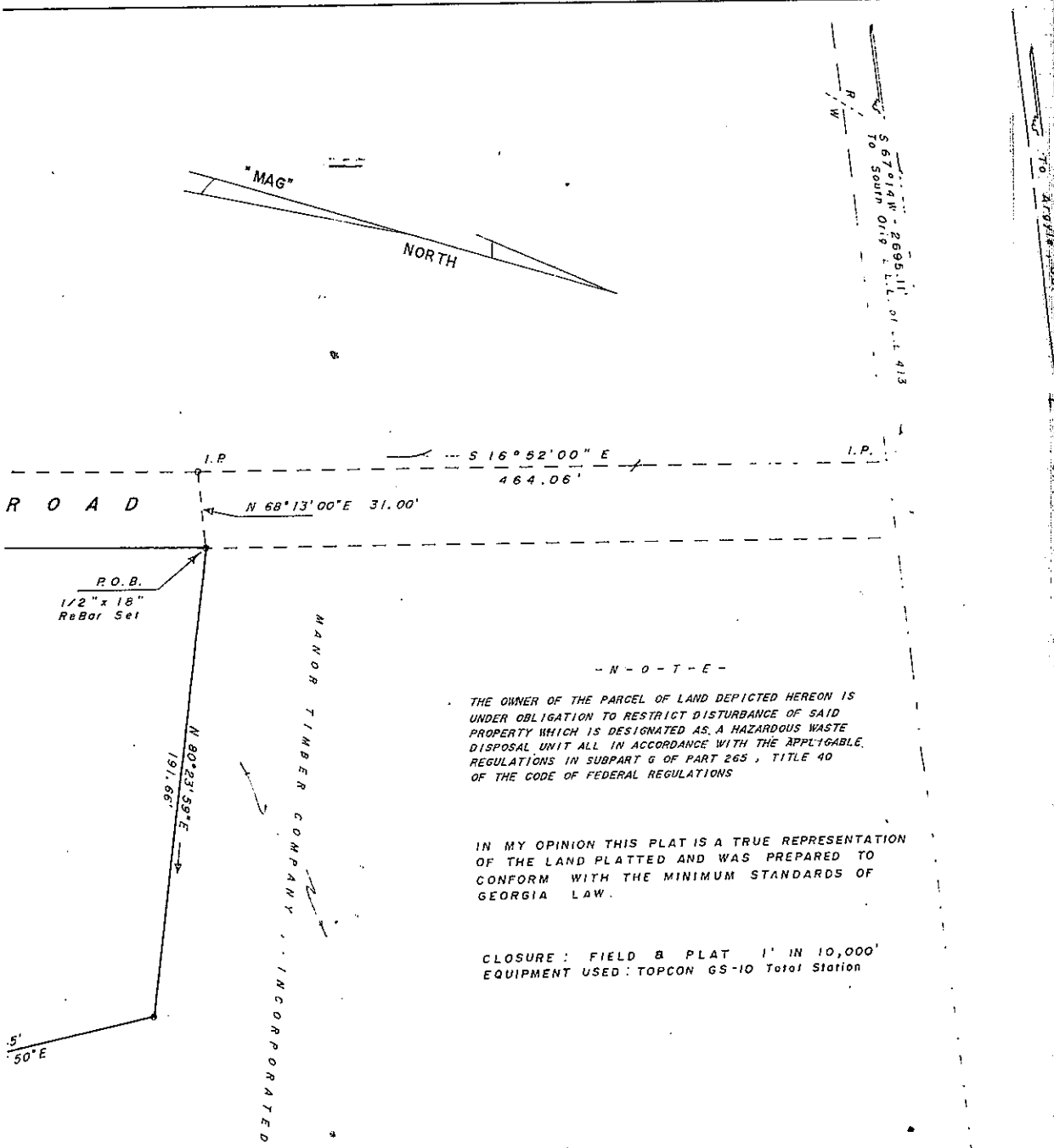
P A N Y , I N C O R P O R A T E D

, GA.

40'



WILLIAM H. BRANCH, JR.
GA. REG. LAND SURVEYOR NO. 1197
P.O. BOX 95 STOCKTON, GA. 31649
PHONE 1-912-242-0778

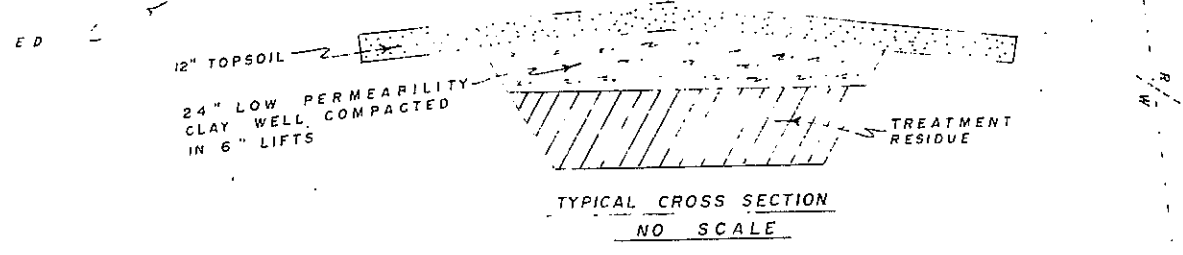


- N - O - T - E -

THE OWNER OF THE PARCEL OF LAND DEPICTED HEREON IS UNDER OBLIGATION TO RESTRICT DISTURBANCE OF SAID PROPERTY WHICH IS DESIGNATED AS A HAZARDOUS WASTE DISPOSAL UNIT ALL IN ACCORDANCE WITH THE APPLICABLE REGULATIONS IN SUBPART G OF PART 265, TITLE 40 OF THE CODE OF FEDERAL REGULATIONS

IN MY OPINION THIS PLAT IS A TRUE REPRESENTATION OF THE LAND PLATTED AND WAS PREPARED TO CONFORM WITH THE MINIMUM STANDARDS OF GEORGIA LAW.

CLOSURE: FIELD & PLAT 1" IN 10,000'
EQUIPMENT USED: TOPCON GS-10 Total Station



S U R V E Y F O R

T I M B E R C O M P A N Y , I N C O R P O R A T E D

LAND DISTRICT - CLINCH CO., GA.



APPENDIX B7. PUMP REPORTS (in gallons)

January 2019

RW1 1,499,090
Pump 2 9,060,620
Pump 3 10,096,430
Pump 4 11,819,195
Pump 5 7,362,690
M#1 17,566,410

February 2019

RW1 1,533,610
Pump 2 9,122,870
Pump 3 10,143,500
Pump 4 11,872,215
Pump 5 7,435,520
M#1 17,842,550

March 2019

RW1 1,558,100
Pump 2 9,138,380
Pump 3 10,151,320
Pump 4 11,885,435
Pump 5 7,456,190
M#1 17,931,800

April 2019

RW1 1,593,080
Pump 2 9,158,830
Pump 3 10,176,670
Pump 4 11,907,085
Pump 5 7,490,980
M#1 18,064,970

May 2019

RW1 1,636,800
Pump 2 9,197,510
Pump 3 10,198,020
Pump 4 11,944,055
Pump 5 7,551,520
M#1 18,270,410

June 2019

RW1 1,650,250
Pump 2 9,213,700
Pump 3 10,207,790
Pump 4 11,955,325
Pump 5 7,564,270
M#1 18,359,660

July 2019

RW1 1,663,050
Pump 2 9,218,760
Pump 3 10,216,950
Pump 4 11,955,325
Pump 5 7,564,270
M#1 18,393,580

August 2019

RW1 1,745,690
Pump 2 9,268,680
Pump 3 10,265,650
Pump 4 11,992,895
Pump 5 7,566,020
M#1 18,635,850

September 2019

RW1 1,787,750
Pump 2 9,299,760
Pump 3 10,267,810
Pump 4 12,011,005
Pump 5 7,590,640
M#1 18,768,510

October 2019

RW1 1,819,410
Pump 2 9,325,800
Pump 3 10,267,810
Pump 4 12,022,545
Pump 5 7,597,600
M#1 18,860,780

November 2019

RW1 1,850,350
Pump 2 9,338,950
Pump 3 10,268,520
Pump 4 12,043,885
Pump 5 7,598,360
M#1 18,956,023

December 2019

RW1 1,887,090
Pump 2 9,351,340
Pump 3 10,269,220
Pump 4 12,064,850
Pump 5 7,599,885
M#1 19,044,037

January 2020

RW1 1,955,180
Pump 2 9,456,880
Pump 3 10,316,980
Pump 4 12,118,311
Pump 5 7,610,240
M#1 15,570,950

February 2020

RW1 1,955,500
Pump 2 9,462,800
Pump 3 10,317,250
Pump 4 12,101,210
Pump 5 7,617,420
M#1 15,647,045

March 2020

RW1 1,962,000
Pump 2 9,499,830
Pump 3 10,318,980
Pump 4 12,104,320
Pump 5 7,646,860
M#1 15,723,140

April 2020

RW1 1,963,660
Pump 2 9,507,910
Pump 3 10,325,220
Pump 4 12,173,265
Pump 5 7,652,220
M#1 15,776,670

May 2020

RW1 1,966,100
Pump 2 9,517,450
Pump 3 10,338,130
Pump 4 12,179,910
Pump 5 7,657,210
M#1 15,833,580

June 2020

RW1 1,971,540
Pump 2 9,523,038
Pump 3 10,344,134
Pump 4 12,344,134
Pump 5 7,661,710
M#1 15,848,770

July 2020

RW1 1,976,340
Pump 2 9,528,015
Pump 3 10,350,004
Pump 4 12,186,170
Pump 5 7,664,190
M#1 15,863,270

August 2020

RW1 1,981,940
Pump 2 9,532,885
Pump 3 10,356,194
Pump 4 12,188,150
Pump 5 7,666,160
M#1 15,876,950

September 2020

RW1 1,987,100
Pump 2 9,539,045
Pump 3 10,361,864
Pump 4 12,188,150
Pump 5 7,668,250
M#1 15,892,210

October 2020

RW1 1,993,300
Pump 2 9,545,390
Pump 3 10,368,150
Pump 4 12,190,100
Pump 5 7,670,430
M#1 15,909,530

November 2020

RW1 1,998,650
Pump 2 9,549,380
Pump 3 10,389,110
Pump 4 12,192,254
Pump 5 7,672,730
M#1 16,044,050

December 2020

RW1 2,004,010
Pump 2 9,552,480
Pump 3 10,392,710
Pump 4 12,197,290
Pump 5 7,678,360
M#1 16,059,050

January 2021

RW1 2,039,625
Pump 2 9,566,110
Pump 3 10,402,285
Pump 4 12,216,668
Pump 5 7,697,735
M#1 16,166,625

February 2021

RW1 2,075,240
Pump 2 9,579,740
Pump 3 10,411,860
Pump 4 12,235,423
Pump 5 7,717,735
M#1 16,274,200

March 2021

RW1 2,112,000
Pump 2 9,580,580
Pump 3 10,436,090
Pump 4 12,253,923
Pump 5 7,745,245
M#1 16,382,040

April 2021

RW1 2,121,973
Pump 2 9,585,803
Pump 3 10,445,650
Pump 4 12,256,045
Pump 5 7,747.367
M#1 16,409,040

May 2021

RW1 2,131,946
Pump 2 9,591,071
Pump 3 10,455,228
Pump 4 12,258,163
Pump 5 7,749,501
M#1 16,442,040

June 2021

RW1 2,141,920
Pump 2 9,596,250
Pump 3 10,464,770
Pump 4 12,260,289
Pump 5 7,751,611
M#1 16,469,040

July 2021

RW1 1,989,200
Pump 2 9,540,044
Pump 3 10,359,002
Pump 4 12,191,879
Pump 5 7,662,880
M#1 15,900,412

August 2021

RW1 1,997,456
Pump 2 9,539,206
Pump 3 10,360,179
Pump 4 12,189,963
Pump 5 7,671,893
M#1 16,001,254

September 2021

RW1 1,987,100
Pump 2 9,539,045
Pump 3 10,361,864
Pump 4 12,188,150
Pump 5 7,668,250
M#1 15,892,210

October 2021

RW1 1,993,300
Pump 2 9,545,390
Pump 3 10,368,150
Pump 4 12,190,100
Pump 5 7,670,430
M#1 15,909,530

November 2021

RW1 1,998,650
Pump 2 9,549,380
Pump 3 10,389,110
Pump 4 12,192,254
Pump 5 7,672,730
M#1 16,044,050

December 2021

RW1 2,0004,010
Pump 2 9,552,480
Pump 3 10,392,710
Pump 4 12,197,290
Pump 5 7,678,360
M#1 16,059,050

January 2022

RW1 2,039,625
Pump 2 9,566,110
Pump 3 10,402,285
Pump 4 12,216,668
Pump 5 7,697,735
M#1 16,166,625

February 2022

RW1 2,075,240
Pump 2 9,579,740
Pump 3 10,411,860
Pump 4 12,235,423
Pump 5 7,717,735
M#1 16,274,200

March 2022

RW1 2,112,000
Pump 2 9,580,580
Pump 3 10,436,090
Pump 4 12,253,923
Pump 5 7,745,245
M#1 16,382,040

April 2022

RW1 2,121,973
Pump 2 9,585,803
Pump 3 10,445,650
Pump 4 12,256,045
Pump 5 7,747.367
M#1 16,409,040

May 2022

RW1 2,131,946
Pump 2 9,591,071
Pump 3 10,455,228
Pump 4 12,258,163
Pump 5 7,749,501
M#1 16,442,040

June 2022

RW1 2,141,920
Pump 2 9,596,250
Pump 3 10,464,770
Pump 4 12,260,289
Pump 5 7,751,611
M#1 16,469,040

SECTION C. WASTE CHARACTERISTICS

This section does not apply as this site is not a TSD facility.

40 CFR 264.1(g)(3) states the requirements of this part do not apply to a generator accumulating waste on site in compliance with Part 262.16 and Part 262.17 (a generator may accumulate waste on site for 90 days or less without a permit).

SECTION D. USE AND MANAGEMENT OF CONTAINERS

This section does not apply as this site is not a TSD facility.

40 CFR 264.1(g)(3) states the requirements of this part do not apply to a generator accumulating waste on site in compliance with Part 262.16 and Part 262.17 (a generator may accumulate waste on site for 90 days or less without a permit).

SECTION E. GROUNDWATER MONITORING

This section provides detailed information on background and site specific geologic and hydrogeologic data, contaminant plume characteristics, and groundwater corrective action. Figures, tables, and other supporting data are provided in appendices for added clarity.

E-1 Exemption from Groundwater Protection Requirements (40 CFR 270.14(c))

This section is not applicable to this site.

E-2 Interim Status Groundwater Monitoring Data (40 CFR 270.14(c)(1))

This facility is no longer conducting an interim monitoring program. A description of the current monitoring program is provided in Section E-6.

E-3 General Hydrogeologic Information (40 CFR 270.14(c)(2))

Facility Geology and Hydrogeology

Manor Timber is located in the southern portion of the Coastal Plain Physiographic Province of Georgia. The Coastal Plain borders the Piedmont Physiographic Province to the north at a boundary commonly referred to as "The Fall Line" stretching from Columbus in the west to Augusta in the east. The Coastal Plain extends south to the Atlantic coastline where processes of deposition and erosion are presently at work modifying the shoreline. The regional geology of the Coastal Plain consists of Cretaceous to Recent sedimentary rocks and unconsolidated sediments. The lower or southern portion of the Coastal Plain consists of a series of Quaternary beach complexes that parallel the modern coast and are younger in age nearer the coast.

A review of the Geologic Map of Georgia indicates that Manor and surrounding areas are underlain by Pleistocene and Pliocene age unconsolidated sand and gravel formations (*Geologic Map of Georgia, 1976*). Local geologic characteristics of the Waycross and surrounding Ware County area was reviewed from well logs compiled from the Georgia Geologic Survey (*GGs Bulletin 70, 1961*). These logs indicate that the subsurface stratigraphy consists of Pliocene to Recent age undifferentiated sand and clay deposits (ranging from 0-300 feet in depth); Miocene age undifferentiated sand, clay, and limestone deposits (ranging in depth from 300 to 500 feet); followed by Oligocene undifferentiated and the Upper Eocene age Ocala Limestone (ranging in depth from 500 to 775 feet or greater).

A review of site geologic conditions suggests that the geologic unit exposed on site is the Pleistocene to Recent unconsolidated sands and clay formation. A pale green sandy clay was identified starting at approximately 40 feet below ground surface (ft-bgs) that is assumed to be the confining layer of the surficial aquifer on site (refer to boring log for MW-3B, the deepest well on site).

Regional hydrogeological sources indicate that the principal drinking water sources in the Coastal Plain are provided from Cretaceous, Clayton, Clairborne, Principal Artesian or Floridan and Shallow (Miocene and Pliocene to-recent) aquifers. The primary source of groundwater in the Coastal Plain is the Floridan Aquifer system. The Floridan Aquifer can be divided into Upper and Lower units. The Upper Floridan consists of permeable limestone and dolomite of upper Eocene to Oligocene age ranging in thickness from 200 to 700 feet. The principal Eocene formation in the Upper Floridan is the Ocala Limestone. Low permeability Miocene clays and dolomites primarily of the Hawthorne Group act as an overlying confining bed for the Upper Floridan. The Lower Floridan is less permeable than the Upper unit and generally is not utilized when the Upper unit is available. It is separated from the Upper unit by a semi-confining formation of dense, dolomitic limestone (Arora, 1984).

A review of the GGS well logs for Clinch County indicates that potential water bearing aquifer zones were identified in the Pliocene or Miocene sand deposits at 250 feet or greater and in porous limestone units at greater depths. The water bearing zones appear to be confined by thick Miocene age clay units. Potable water in the Ware County area is derived from the Floridan Aquifer.

The site and surrounding properties are reportedly connected to the municipal water supply. One private water well, located near the maintenance shop, is used for potable water for plant operations. The water well is approximately 400 feet deep and withdraws water from the Floridan Aquifer, also known as the Principal Artesian Aquifer. Historically there were also two additional withdrawal wells located near the boiler and near the old house (north of the current mobile home). These two wells were constructed as shallow sand wells to approximately 20 ft-bgs and were used for boiler make-up water and for watering the lawn and garden. Both wells were constructed prior to 1983 and as of 1993 were reportedly abandoned and are no longer in use.

Shallow groundwater flow, as observed from monitoring well gauging, is predicted to migrate slowly to the north due to the minimal hydraulic gradient. Predicted groundwater flow sometimes shows a reversal due to localized precipitation resulting in shallow water table recharge. The mean sea level of the facility ranges from 163 feet above mean sea level near the center of the site to 155 feet above mean sea level near the southern boundary.

There are two principal drainage features in the vicinity of Manor Timber including Box Creek located approximately ½ mile west and Little Suwanee Creek located approximately ½ mile to the east. Both creeks generally flow from the northwest toward the southeast. Little Suwanee Creek emerges from a series of wetlands approximately one mile northwest of US Highway 84. Box Creek emerges from a series of wetlands more than three miles northwest of US Highway 84 and is considered the dominant drainage feature in the vicinity because it exhibits a larger drainage basin.

The general surface water drainage pattern in the vicinity of the site is to the south/southwest toward Box Creek. Due to shallow permeable soils, virtually all storm water percolates into the shallow groundwater and little, if any, runoff occurs. During heavy rainfall periods, however, it is possible for some limited, short term surface runoff to occur. Several shallow east/west drainage swales have been constructed on the site to control storm water during heavy rainfall. These swales carry surface water to the west where it is diverted into a collector channel running in a north/south direction. Surface runoff discharges either into the drainage canal paralleling the railroad or moves in a southerly direction and eventually discharges into Box Creek through a series of wetlands.

Groundwater Elevation Data and Flow Direction

The most recent groundwater elevation measurements were obtained on October 23, 2017, May 23, 2019, and June 28, 2022. Depth to water during the October 2017 event ranged from 3.36 feet in MW-16 to 7.25 feet in MW-3, excluding well MW-3B. Depth to water during the May 2019 event ranged from 4.00 feet in MW-16 to 7.38 feet in MW-6, excluding deep well MW-3B. Depth to water during the June 2022 event ranged from 3.06 feet in MW-16 to 6.54 feet in MW-4B, excluding deep well MW-3B.

The water table experiences increases/decreases in depth generally due to seasonal variations in rainfall (among other factors) which provides aquifer recharge.

Potentiometric surface maps for the shallow residuum groundwater flow zone were prepared using the October 2017, May 2019, and June 2022 groundwater elevations and are provided in Section B as **Figures B7, B8, and B17** respectively. A review of the maps indicates similar groundwater flow patterns with the predicted flow direction to the north. Groundwater flow may sometimes show a reversal or radial pattern because of rainfall since the water table is only a few feet from the land surface. Box Creek, located approximately 1,500 feet to the west, is the nearest surface water body.

Hydraulic Flow Calculations

Hydraulic flow properties including hydraulic conductivity and linear groundwater flow velocity were evaluated by the previous consultant. EnviroRisk obtained these values from prior reports and utilized them to calculate the horizontal flow velocity. The hydraulic conductivity can be loosely defined as the velocity at which groundwater moves through the water-bearing soil medium.

The average horizontal groundwater flow was calculated using data collected during the June 2022 sampling event. Calculations were performed using the following formula taken from Darcy's equation for fluid flow through a porous medium:

Where:

$$V_h = \left[\frac{K \frac{dh}{dl}}{n} \right]$$

K = the average hydraulic conductivity of 3.25 feet per day (ft/day);

dh/dl = the hydraulic gradient measured as the hydraulic head distance between up-gradient well MW-5 and down-gradient well MW-9, divided by the measured distance between the wells, equaling 0.003 ft/ft; and

n = an estimated effective porosity of 25% or 0.25.

Using this formula, an average horizontal groundwater flow velocity of 0.039 ft/day or 14.2 feet per year (ft/year) was calculated. A previous horizontal flow velocity was calculated in 1995 at 14.2 ft/year using these assumed values. This calculated value assumes groundwater flow occurs through a homogeneous, isotropic, porous medium and should be considered as an estimate only. Since flow directions are sometimes reversed and/or radial, a constant gradient should not be assumed.

E-4 Topographic Map Requirements (40 CFR 270.14(c)(2),(3),(4)(i))

Topographic maps meeting the requirements of this section is provided in Section B as **Figures B-1** and **B-2**. **Figure B-1** is a topographic map of Manor Timber Company drawn to a scale of 1 inch = 100 feet with a one foot contour interval. The terrain is extremely flat with only about 8 feet of relief over the entire site. Mean sea level elevations on the site range from a high of about 163.0 near the center of the site to a low of about 155.0 near the southern boundary.

Figure B-2 is a topographic map prepared using a copy of the U.S.G.S 7.5 minute Homerville East 1988 quadrangle. The general topographic setting of the facility and surrounding area are shown on this map. The two principal drainage features with respect to the facility are shown and are identified as Box Creek to the west and Little Suwanee Creek to the east. Both generally flow from the northwest toward the southeast. Little Suwanee Creek emerges from a series of wetlands approximately one mile northwest of U.S. Highway 84. Box Creek emerges from a series of wetlands more than three miles northwest of U.S. Highway 84 and is also joined by a tributary known as Polly Branch just north of U.S. Highway 84. Box Creek is considered the dominant drainage feature in the vicinity of the facility because it exhibits a much larger drainage basin. The facility and closed surface impoundment are located slightly closer to Box Creek to the south/southwest than Little Suwanee Creek to the east/southeast. The general drainage pattern in the vicinity of the site is to the south/southwest towards Box Creek.

E-5 Contaminant Plume Description (40 CFR 270.14(c)(2),(4),(7))

Groundwater impact at this site includes a mixture of dissolved volatile organic compounds (VOCs), semi-volatile organics (SVOCs), and dioxins. Appendix IX sampling is performed bi-annually to identify any new constituents that need to be added to the facility's permit.

Groundwater sampling is currently performed on a semi-annual basis as shown on the table below.

Well Descriptions and Sampling Requirements

Well ID	Well Purpose	Sampling Frequency	Constituents	
MW-4B	POC	Group 1- Semi-annual	Phenol	Anthracene
MW-9	Monitoring		2-Picoline	Carbazole
MW-11	Monitoring		2-Chlorophenol	Fluoranthene
MW-15	POC		2,3,4-Methylphenol	Benzo(a)anthracene
MW-16	POC		2,4-Dimethylphenol	Chrysene
MW-17	POC		Naphthalene	Benzo(b,k)fluoranthene
MW-18	Monitoring		p-Chloro-m-cresol	Benzo(a)pyrene
MW-19	Monitoring		o,m,p-Cresol	Dibenzo(a,h)anthracene
MW-20*	Monitoring		2-Methylnaphthalene	Indeno(1,2,3-cd)pyrene
MW-4B	Monitoring	Group 2- Biennial for Appendix IX	2,4,6-Trichlorophenol	Vinyl chloride
MW-15	POC		Acenaphthylene	Acetone
MW-16	POC		2,3,4,6-Tetrachlorophenol	2-Butanone
MW-17	POC		Acenaphthene	Benzene
MW-3	Monitoring	Group 3- Biennial	2,4-Dinitrophenol	4-Methyl-2-pentanone
MW-3B	Monitoring		Dibenzofuran	Toluene
MW-5	POC		2,4-Dinitrotoluene	2-Hexanone
MW-6	POC		Fluorene	Ethylbenzene
MW-7	Background		Pentachlorophenol	o,m,p-Xylene
MW-8	Monitoring		Phenanthrene	
MW-10	Monitoring			
MW-1	Monitoring	Group 4- Not Sampled, Water Level only	None	None
MW-1A	Monitoring			
MW-12	Monitoring			
MW-13	Monitoring			
MW-14	Monitoring	Not sampled, no water levels		
AB-5	Piezometer			
RW-1R	Recovery			
RW-2	Recovery			
MW-2	Recovery			
MW-3A	Recovery			
MW-4A*	Recovery			

Notes: POC = Point of Compliance well

*MW-4A requires replacement and MW-20 is not installed

Historical concentration data for VOCs and SVOCs are provided in Section B as **Tables B3, B4, and B5**. Dioxin sampling data is provided on **Table E1**. Appendix IX sampling data for the May 2019 and June 2022 events are provided in **Table E2**. Graphical concentration trend graphs prepared for selected wells for VOCs and SVOCs is provided in Section B as **Graphs 1-13**.

A description of detected constituents summarized in compound groups is provided in the section below followed by a discussion of the horizontal and vertical extent of regulated constituents and relevant concentration trends in subsequent sections.

Description of Detected Constituents

VOCs, SVOCs, dioxins, and Appendix IX parameters detected during the October 2017, May 2019, and June 2022 sampling events are discussed individually in the following sub-subsections followed by a discussion of individual compounds detected.

VOC Detections

In October 2017, a total of 6 VOCs were detected in the monitoring wells, in May 2019 a total of 8 VOCs were detected in the monitoring wells, and in June 2022 a total of seven VOCs were detected in the monitoring wells. VOC sampling results are reported in Section B as **Table B4**. The VOCs detected during the events are as follows:

- Acetone;
- Benzene;
- Ethylbenzene;
- 2-Hexanone;
- Methyl Ethyl Ketone;
- 4-Methyl 2-Pentanone;
- Toluene;
- Styrene; and
- Xylenes.

Concentration ranges for VOCs for the October 2017 sampling event are as follows:

- Acetone was detected at 29.0 micrograms per liter ($\mu\text{g/l}$) in MW-18 and at 140 $\mu\text{g/l}$ in MW-17.
- Benzene was detected in 3 wells at concentrations ranging from 1.3 $\mu\text{g/l}$ in MW-4B to 7.5 $\mu\text{g/l}$ in MW-17.
- Ethylbenzene was detected in 4 wells at concentrations ranging from 1.1 $\mu\text{g/l}$ in MW-4B to 20.0 $\mu\text{g/l}$ in MW-18.
- Methyl Ethyl Ketone was detected in MW-18 only at 13.0 $\mu\text{g/l}$.

- Toluene was detected in 3 wells at concentrations ranging from 160 µg/l in MW-18 to 1,500 µg/l in MW-16.
- Xylenes were detected at 4.2 µg/l in MW-18 and at 15.0 µg/l in MW-17.

Concentration ranges for VOCs for the May 2019 sampling event are as follows:

- Acetone was detected in 3 wells at concentrations ranging from 33.1 µg/l in MW-18 to 124 µg/l in MW-16.
- Benzene was detected at 2.5 µg/l in MW-18 and at 4.8 µg/l in MW-17.
- Ethylbenzene was detected in 3 wells at concentrations ranging from 9.2 µg/l in MW-16 to 19.6 µg/l in MW-18.
- 2-Hexanone was detected in MW-17 only at 23.8 µg/l.
- Methyl Ethyl Ketone was detected in 3 wells at concentrations ranging from 14.0 µg/l in MW-18 to 62.6 µg/l in MW-16.
- 4-Methyl 2-Pentanone was detected at 5.5 µg/l in MW-3 and at 5.7 µg/l in MW-3B.
- Toluene was detected in 4 wells at concentrations ranging from 1.1 µg/l in MW-15 to 1,240 µg/l in MW-16.
- Xylenes were detected in 3 wells at concentrations ranging from 3.2 µg/l in MW-16 to 20.6 µg/l in MW-17.

Concentration ranges for VOCs for the June 2022 sampling event are as follows:

- Acetone was detected at 320 µg/l in MW-16 and at 140 µg/l in MW-17.
- Benzene was detected at 31.0 µg/l in MW-17 only.
- Ethylbenzene was detected in 3 wells at concentrations ranging from 9.9 µg/l in MW-16 to 30.0 µg/l in MW-17.
- 2-Hexanone was detected at 13.0 µg/l in MW-16 only.
- Methyl Ethyl Ketone was detected at 160 µg/l in MW-16 only.
- Toluene was detected in 3 wells at concentrations ranging from 79.0 µg/l in MW-18 to 2,200 µg/l in MW-16.

- Styrene was detected in MW-17 at $\mu\text{g/l}$ during the Appendix IX analysis.
- Xylenes were detected at 70.0 $\mu\text{g/l}$ in MW-17 only.

SVOC Detections

In October 2017, a total of 11 SVOCs were detected in the monitoring wells, in May 2019 a total of 12 SVOCs were detected in the monitoring wells, and in June 2022 a total of 15 SVOCs were detected in the monitoring wells. SVOC sampling results are reported in Section B as **Table B5**. The SVOCs detected during the events are as follows:

- Acenaphthene;
- Acenaphthylene;
- Carbazole;
- Dibenzofuran;
- 2,4-Dimethylphenol;
- Fluorene;
- 2-Methylnaphthalene;
- 2-Methylphenol (o-cresol);
- 3,4-Methylphenol (m+p-cresol);
- 4-Methylphenol
- Naphthalene;
- Pentachlorophenol;
- Phenanthrene;
- Phenol; and
- 2,3,4,6-Tetrachlorophenol.

Concentration ranges for SVOCs for the October 2017 sampling event are as follows:

- Acenaphthene was detected in 4 monitoring wells at concentrations ranging from 20.0 $\mu\text{g/l}$ in MW-18 to 260 $\mu\text{g/l}$ in MW-17.
- Carbazole was detected at 190 $\mu\text{g/l}$ in MW-17 only.
- Dibenzofuran was detected at 43.0 $\mu\text{g/l}$ in MW-4B only.
- 2,4-Dimethylphenol was detected in 3 monitoring wells at concentrations ranging from 56.0 $\mu\text{g/l}$ in MW-18 to 240 $\mu\text{g/l}$ in MW-17.
- Fluorene was detected in 4 monitoring wells at concentrations ranging from 29.0 $\mu\text{g/l}$ in MW-18 to 190 $\mu\text{g/l}$ in MW-17.
- 2-Methylnaphthalene was detected in 4 monitoring wells at concentrations ranging from 25.0 $\mu\text{g/l}$ in MW-16/MW-18 to 320 $\mu\text{g/l}$ in MW-17.

- 2-Methylphenol (o-cresol) was detected in 3 monitoring wells at concentrations ranging from 52.0 µg/l in MW-18 to 93.0 µg/l in MW-17.
- 3,4-Methylphenol (m+p-cresol) was detected in 3 monitoring wells at concentrations ranging from 52.0 µg/l in MW-18 to 350 µg/l in MW-16.
- Naphthalene was detected in 4 monitoring wells at concentrations ranging from 160 µg/l in MW-4B to 2,400 µg/l in MW-17.
- Phenanthrene was detected at 54.0 µg/l in MW-17 and at 57.0 µg/l in MW-4B.
- Phenol was detected at 34.0 µg/l in MW-16 and at 100 µg/l in MW-17.

Concentration ranges for SVOCs for the May 2019 sampling event are as follows:

- Acenaphthene was detected in 7 monitoring wells at concentrations ranging from 10.0 µg/l in MW-15 to 279 µg/l in MW-17.
- Carbazole was detected in 4 monitoring wells at concentrations ranging from 10.2 µg/l in MW-18 to 138 µg/l in MW-17.
- Dibenzofuran was detected at 20.0 µg/l in MW-4B and at 106 µg/l in MW-17.
- 2,4-Dimethylphenol was detected in 3 monitoring wells at concentrations ranging from 58.0 µg/l in MW-18 to 142 µg/l in MW-17.
- Fluorene was detected in 6 monitoring wells at concentrations ranging from 22.0 µg/l in MW-15 to 156 µg/l in MW-17.
- 2-Methylnaphthalene was detected in 5 monitoring wells at concentrations ranging from 11.4 µg/l in MW-11 to 255 µg/l in MW-17.
- 2-Methylphenol (o-cresol) was detected in 3 monitoring wells at concentrations ranging from 37.9 µg/l in MW-18 to 58.0 µg/l in MW-16.
- 3,4-Methylphenol (m+p-cresol) was detected in 3 monitoring wells at concentrations ranging from 61.1 µg/l in MW-18 to 278 µg/l in MW-16.
- Naphthalene was detected in 6 monitoring wells at concentrations ranging from 31.0 µg/l in MW-15 to 1,620 µg/l in MW-17.
- Pentachlorophenol was detected at 60.8 µg/l in MW-4B only.
- Phenanthrene was detected at 29.6 µg/l in MW-4B and at 82.3 µg/l in MW-17.

- Phenol was detected at 34.3 µg/l in MW-16 and at 54.9 µg/l in MW-17.

Concentration ranges for SVOCs for the June 2022 sampling event are as follows:

- Acenaphthene was detected in 6 monitoring wells at concentrations ranging from 18.0 µg/l in MW-15 to 400 µg/l in MW-17.
- Acenaphthylene was detected at 11.0 µg/l in MW-17 only.
- Carbazole was detected in 4 monitoring wells at concentrations ranging from 14.0 µg/l in MW-11 to 400 µg/l in MW-17.
- Dibenzofuran was detected in 4 monitoring wells at concentrations ranging from 10.0 µg/l in MW-11 to 240 µg/l in MW-17.
- 2,4-Dimethylphenol was detected at 22.0 µg/l in MW-18 and at 300 µg/l in MW-17.
- Fluorene was detected in 6 monitoring wells at concentrations ranging from 11.0 µg/l in MW-15 to 240 µg/l in MW-17.
- 2-Methylnaphthalene was detected in 5 monitoring wells at concentrations ranging from 14.0 µg/l in MW-11 to 530 µg/l in MW-17.
- 2-Methylphenol (o-cresol) was detected in 3 monitoring wells at concentrations ranging from 15.0 µg/l in MW-18 to 160 µg/l in MW-17.
- 3,4-Methylphenol (m+p-cresol) was detected at 450 µg/l in MW-17 and at 540 µg/l in MW-16.
- 4-Methylphenol was detected at 540 µg/l in MW-16 and at 450 µg/l in MW-17.
- Naphthalene was detected in 6 monitoring wells at concentrations ranging from 13.0 µg/l in MW-15 to 5,200 µg/l in MW-17.
- Pentachlorophenol was detected at 240 µg/l in MW-17 only.
- Phenanthrene was detected at 60.0 µg/l in MW-4B and at 140 µg/l in MW-17.
- Phenol was detected at 140 µg/l in MW-17 only.
- 2,3,4,6-Tetrachlorophenol was detected at 110 µg/l in MW-17 only.

In addition, 2,4,5-Trichlorophenol was detected at 52.0 µg/l and Acetophenone was detected at 73.0 µg/l in MW-17 during the Appendix IX analysis.

Dioxins

Dioxin analysis is required by the Permit bi-annually as part of the Appendix IX analysis. Monitoring wells MW-4B, MW-15, MW-16, and MW-17 are sampled on a rotating basis. During the May 2019 sampling event, MW-15 was analyzed for dioxins. During the June 2022 sampling event, MW-17 was analyzed for dioxins. Results are reported on **Table E1**.

Dioxin isomers detected in 2019 in MW-15 include Hexa CDF [(0.0097 nanograms per liter (ng/L)], Total HpCDD (0.06 ng/L), Total HpCDF (0.049 ng/L), OCDD (0.29 ng/L), and OCDF (0.38 ng/L). EnviroRisk only had access to historical data for 2009, 2010, and 2014; however, all of these dioxins with the exception of Total HpCDF and OCDF were previously detected.

The only dioxin isomer detected in 2022 in MW-17 was TCDF at 4.9 ng/L.

Appendix IX Results

Appendix IX parameters were collected from MW-15 during the May 2019 sampling event and from MW-17 during the June 2022 sampling event. In accordance with permit requirements, Appendix IX sampling is performed bi-annually on a rotating basis from wells MW-4B, MW-15, MW-16, and MW-17. The purpose of the Appendix IX sampling is to identify any new constituents that need to be added to the facility's permit. Appendix IX sampling results are provided in **Table E2**.

Trend Analysis

Concentration versus time graphs were prepared for VOCs and SVOCs for select wells and are discussed in Section B.

Horizontal Extent of Contaminant Plumes

Isoconcentration maps were prepared depicting the horizontal extent of total VOCs (provided in Section B as **Figures B10, B12, B13, B15, and B18**) and SVOCs (provided in Section B as **Figures B9, B11, B14, B16, and B19**) for the 1998, 2006, October 2017, May 2019, and June 2022 sampling events. These maps provide an interpretation of plume migration and source area contaminant distribution.

A review of the horizontal extent of VOCs for the most recent three sampling events provided in Section B as **Figures B13, B15, and B18** indicates the presence of one dissolved plume with highest concentrations on the northern side of the impoundment. The highest total VOC concentrations for both events was detected in MW-16. The plume is approximately 400 feet in length primarily covering the closed surface impoundment.

The extent of VOCs is delineated to non-detect concentrations by MW-9/MW-19 to the north, MW-10/MW-11 to the east, MW-5/MW-8 to the south, and MW-7 further to the west.

A review of the horizontal extent of SVOCs for the most recent three sampling events provided in Section B as **Figures B14, B16, and B19** indicates the presence of one dissolved plume with highest concentrations also on the northern side of the impoundment, similar to the extent of VOCs. The highest total SVOC concentrations for all three events was detected in MW-17. The plume is slightly larger than the VOC plume and stretches approximately 450 feet in length, primarily covering the closed surface impoundment. The extent of SVOCs is delineated to non-detect concentrations by MW-9/MW-19 to the north, MW-10 to the east, MW-5/MW-8 to the south, and MW-7 further to the west. **Figures B16 and B19** displays a slightly larger dissolved plume due to the detection of SVOCs in MW-11, located east of the impoundment. MW-11 was non-detect during the October 2017 event; however, this well has historically contained SVOCs.

E-6 General Monitoring Program Requirements (40 CFR 270.14(c)(5);264.90(b)(4); 264.97)

The general monitoring program requirements are described in the subsections below.

Description of Wells (40 CFR 270.14(c)(5); 264.97(a),(b),(c))

A total of 21 monitoring wells, 5 recovery wells, and 1 piezometer are currently located at the facility. The groundwater monitoring system includes MW-1, MW-1A, MW-3, MW-3B, MW-4B, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, MW-17, MW-18 and MW-19. Wells MW-4B, MW-5, MW-6, MW-15, MW-16 and MW-17 are the point of compliance (POC) wells installed along the boundary of the closed surface impoundment. MW-7 is the upgradient well. MW-3B is a deep monitoring well which monitors the underlying aquifer. MW-1, MW-1A, and AB-5 are not sampled and are used only for groundwater level data. Wells MW-8, 9, 10, and 11 are all sentinel wells which are located south and east of the closed surface impoundment to detect movement in these directions. Wells MW-12, MW-13 and MW-14 are "second line" sentinels. MW-19 was the last monitoring well installed (September 1998) to specifically monitor movement beyond MW-18. **Figures B-1 and B-4** displays well locations. An additional well (MW-20) is proposed for installation northeast of MW-18 (**Figure B-4**). It is also proposed that the piezometer AB-5 be closed in accordance with the Water Well Standards Act.

The details of well installation methods and well logs for the groundwater monitoring system are provided in Section B as **Appendix B3**. One additional monitoring well (MW-20) is proposed approximately 150 feet northeast of MW18 and north of MW-9 (refer to Section B, **Figure B-4**). Well depths and screened intervals are provided in Section B as **Table B2**.

Description of Sampling and Analysis Procedures (270.14(c)(5); 264.97(d),(e),(f))

Post-closure monitoring is currently conducted on a semi-annual basis. Sampling procedures followed are described in the EPA, Region IV, Field Branches Quality System & Technical Procedures (FBQSTP), Science and Ecosystem Support Division, Operating Procedure (SESDPROC), dated April 26, 2017 or the latest version. Specifics of the sampling and analysis procedures are described below in the italicized sections.

Groundwater Depth Gauging

Before groundwater sampling, the total depth of each well and depth to groundwater is measured in all monitoring wells on site. Water level measurements are taken from the marked surveyed side of each well casing using an electronic water level indicator with 0.01 foot accuracy. To limit cross-contamination, measurements are taken starting with wells historically containing non-detect levels of contaminants and progressing to wells with higher contaminant levels. All measurements are recorded in a field notebook for use in calculating purge volumes, groundwater elevations, and flow direction. The water level indicator is decontaminated between each well by rinsing with a phosphate-free detergent, potable water, and de-ionized water in accordance with procedures described in the SESDPROC. Calculated groundwater elevations are added to the Groundwater Elevation Table along with historic data.

Groundwater Purging Procedure

After the collection of static water levels from the wells, the standing water column or well volume is calculated for each well to determine purge volumes. The calculation used for determining the volume of water in each well is as follows (based on a 2" diameter well):

$$V = 0.163 * h$$

Where:

V = Volume of water in gallons
0.163 = gallons/foot conversion (2" well)
h = height of water column in feet

Prior to well purging, the ground surface around each well is prepared by placing disposable polyethylene sheeting around the well heads. Field purging is performed under "low flow" conditions using a peristaltic or submersible pump (RediFlo2-type) with dedicated disposable tubing. The quantity of water removed from each well is gauged using graduated buckets. During purging, the sampling technician measures and records pH, conductivity, temperature, dissolved oxygen (DO), and turbidity on a continuous basis using a multi-parameter meter equipped with a "Flow-Through" Cell. This meter is calibrated prior to use in the field to ensure accurate data collection. Parameter stabilization is evaluated in accordance with the SESDPROC. When stabilization of the parameters occurs, purging is halted. In the event that stabilization does not occur after three volumes are removed, purging is continued up to the removal of five well volumes or parameter stabilization, whichever occurs first.

The parameter measurements, purge volume data, and other general field sampling observations are recorded on well sampling logs and/or in a field book.

Sample Collection

Groundwater samples are collected in a specific order to reduce the potential for cross contamination between wells. In general, the sampling is conducted from least contaminated to most contaminated based upon a review of the prior sampling event results or historic trends.

Samples are collected after purging is complete using dedicated disposable tubing carefully lowered into the top of the well screen interval to minimize disturbance of the water column. Laboratory supplied containers are utilized for sample collection. Sampling parameters are collected in the order specified in the SESDPROC. Special care is taken when filling sample vials for VOC analyses to ensure minimal disturbance of the sample and zero head space conditions. Each vial is individually checked for the possible entrapment of air bubbles immediately after sample collection.

Upon collection, each sample container is assigned a unique sample identification number and is placed in an insulated cooler on ice. A laboratory Chain-of-Custody form is completed for each cooler. The Chain-of-Custody form is provided by the analytical laboratory and includes the sample date, sample time, sample identification, type of sample, and the requested analytical method. Sample coolers are hand delivered to a local EPD approved laboratory for analysis.

Sampling Plan and Analytical Methods

Currently there are a total of 21 monitoring wells, five extraction/recovery wells, and one piezometer installed on site. All wells were installed prior to EnviroRisk's involvement. The permit issued on July 8, 2011 describes the sampling program, as detailed in Section E-5 above. The current sampling plan was altered from the original sampling plan due to a decrease in concentrations and plume size as a result of corrective action. Remediation goals are currently set to background for all wells and constituents. If additional constituents of concern (COCs) are detected during Appendix IX analyses, the detected COCs are added to the Groundwater Protection Standard in accordance with Part 264.99.

Initially in the 1993 permit modification application, MW-5, MW-8, and one POC well were sampled semi-annually and MW-12, MW-13, and MW-14 were sampled annually. Appendix IX samples were collected annually from one of the POC wells on a rotating basis. According to the 1996 permit modification application, MW-5 was changed to annual sampling (due to non-detect concentrations) and newly installed well MW-18 was added to the semi-annual list. In addition, MW-8, MW-12, MW-13, and MW-14 were moved to the bi-annual schedule due to historic non-detect concentrations.

The table in Section E-5 above details the sampling plan.

Quality Assurance and Quality Control

An internal Quality Assurance/Quality Control (QA/QC) Plan is followed by EnviroRisk personnel to ensure the integrity of the data obtained during each sampling event. The QA/QC Plan includes requirements for experience of field personnel, record keeping, chain-of-custody documentation, sample equipment, sample preservation, and sample shipping and handling.

Quality control samples collected during each sampling event include trip blanks, equipment blanks, and field duplicates. Trip blanks are created and sealed by the laboratory using de-ionized water and accompany each cooler in the field. Equipment blanks are collected per sampling event to document the effectiveness of decontamination procedure when a submersible pump is utilized. The trip blanks and equipment blanks are analyzed for VOCs only. These samples were analyzed to assist in validating the laboratory's ability to reproduce data and to ensure that field conditions did not compromise sampling integrity. One field duplicate is collected from a well chosen during sampling.

Duplicate samples are collected and analyzed to assist in validating the laboratory's ability to reproduce data and to ensure that field conditions did not compromise sampling integrity. The duplicate will be assigned a unique sample identification number such that the receiving laboratory will not be able to recognize the sample as a duplicate. The duplicate samples will be analyzed for all of the constituents required for the well sample that is being duplicated.

Prior to reporting the data to the EPD, a review and evaluation of the quality control sample results will be performed. If significant concentration variances are noted between the duplicate sample and original well sample, the laboratory will be required to re-analyze both samples. If continued discrepancies are noted, additional samples will be collected from the wells and re-analyzed. In the event that detected constituents are observed in the field equipment blank or trip blanks, re-analysis of the blank samples may be required. If the presence of the detected constituents is confirmed, re-sampling of selected wells will be performed, as needed.

Disposal of Purge Water

All purge water generated during well sampling is temporarily stored in containers/drums prior to being transferred into the on-site wastewater treatment system for disposal/recycling.

Procedures for Establishing Background Quality (40 CFR 270.14(c)(5); 264.97(a)(1),(g))

Groundwater background quality will be determined from the up-gradient well MW-7. The statistical procedures for determining background concentrations are discussed in Section E-9.

Statistical Procedures (40 CFR 270.14(c)(5); 264.97(h)(i)(1),(5),(6))

Statistical analysis will be deferred until concentrations of regulated constituents have declined sufficiently such that the facility desires to terminate corrective action. A permit modification will be requested at that time. Concentration versus time graphs have been prepared for wells exceeding GPS concentrations in order to establish reduction trends over time.

E-7 Detection Monitoring Program (40 CFR 270.14(c)(6); 264.91(a)(4);264.98)

This section is not applicable due to prior knowledge of hazardous constituents detected in the groundwater at this facility. In lieu of a Detection Monitoring Program, a Correction Action Program is in place as described in Section E-9.

E-8 Compliance Monitoring Program (40 CFR 270.14(c)(7); 264.99)

This section is not applicable since a Correction Action Program is in place as described in Section E-9.

E-9 Corrective Action Program (40 CFR 270.14(c)(8); 264.99(j);264.100)

From 1972 to 1983, wastewater was generated from the steam drying process as condensed steam and water were drawn from the raw wood. The wastewater was contaminated with residual chemical preservatives (creosote and pentachlorophenol) from the previous treatment cycle that could not be removed from the cylinders and recycled to the make-up tanks. Wastewater was held in a 1.4-acre borrow area used as a surface impoundment. In 1983 a drying kiln was built, and the wood was no longer dried in the cylinders. The impoundment has not been utilized since 1983 and is currently fenced with a locking gate. It was originally designed as a 3,000,000-gallon storage unit.

Prior to 1983, waste generated from wood treating operations using creosote and pentachlorophenol was placed in a surface impoundment located across Black Ankle Road. Biological treatment was used to break down the waste in the surface impoundment from 1983 to 1988 when the surface impoundment was closed as a hazardous waste landfill. Historically CCA was not utilized at the facility, and therefore there are no known discharges of CCA into the surface impoundment.

Manor Timber generates approximately 7,500 pounds of hazardous waste annually during wood treatment processes including creosote waste, CCA waste, and spent carbon. The creosote derived waste (approximately 1,000 pounds annually) is identified as F034 and is comprised of soil, wood debris, and the creosote treatment solution. The CCA derived waste (approximately 3,000 pounds annually) is identified as F035 and is comprised of wood debris and soil mixed with the CCA solution. Spent activated carbon (approximately 3,500 pounds annually) is used to treat contaminated groundwater and is classified as F035 waste.

Corrective action has included closure of the surface impoundment and groundwater monitoring. Characterization of regulated constituents in groundwater followed by a description of the corrective action plan and on-going monitoring and reporting requirements is provided in this section.

Characterization of Contaminated Groundwater (40 CFR 270.14(c)(8)(i))

Characteristics of regulated constituents in groundwater are described in detail in Section E-5. The hazardous constituents detected in the groundwater includes a mixture of dissolved VOCs, SVOCs, and dioxins. The analytical results from the October 2017 event detected VOCs in wells MW-4B, MW-16, MW-17, and MW-18. SVOCs were detected in MW-4B, MW-15, MW-16, MW-17, and MW-18. The analytical results from the May 2019 event detected VOCs in wells MW-3, MW-3B, MW-15, MW-16, MW-17, and MW-18. SVOCs were detected in MW-4B, MW-15, MW-16, MW-17, and MW-18. The analytical results from the June 2022 event detected VOCs in wells MW-16, MW-17, and MW-18. SVOCs were detected in MW-4B, MW-11, MW-15, MW-16, MW-17, and MW-18.

Current and historic compounds detected are provided in Section B on **Tables B3 through B5**. Dioxins have historically been reported in select monitoring wells, and data is provided on **Table E1**.

Concentration Limits (40 CFR 270.14(c)(8)(ii); 264.94;264.100(a)(2))

The maximum concentration limits for constituents in the dissolved plume are set to background concentrations.

Alternative Concentration Limits (40 CFR 270.14(c)(8)(ii); 64.94(b); 264.100(a)(2))

This section is not applicable at this time.

Corrective Action Plan (40 CFR 270.14(c)(8)(iii);264.100(b))

On September 30, 1987, the Georgia EPD issued Hazardous Waste Permit No. HW-047(D). Groundwater samples collected at the facility indicated the presence of detectable concentrations of K001 constituents, and in January 1993 Manor Timber submitted a permit modification request that included preparation of a Corrective Action Plan (CAP). The modified permit was issued in June 1993, and in 1994 Manor Timber groundwater extraction activities commenced in the vicinity of the former surface impoundment from three recovery wells (MW-2, MW-3A, and MW-4A). The recovered water was treated with a two-line granular activated carbon system which was upgraded to a four-line system on May 31, 1999. Each line had three carbon canisters. RW-1 (later replaced with RW-1R) was added in 1996 to the recovery well system and RW-2 was added in 2002. Currently a total of five wells are utilized in the extraction system. Typically, over 150,00 gallons of groundwater per month are recovered, treated, and discharged to an on-site pond which has no discharge to surface waters.

On September 30, 1996, the permit was amended to include post closure care of the surface impoundment, and a new permit was subsequently approved on September 30, 1997. On September 21, 2002, Manor Timber prepared a Work Plan that described modification to the groundwater recovery system, including the addition of an additional recovery well on the northeast corner of the impoundment (RW-2). The most recent permit renewal was completed on July 8, 2011 followed by a Permit Modification on January 12, 2018. Currently there are a total of 21 monitoring wells, five extraction/recovery wells, and one piezometer installed on site.

The permit issued on July 8, 2011 described the sampling program, which was then amended in 2018. The 2018 amendment required semi-annual sampling of all POC wells. The current sampling plan was altered from the original 2011 sampling plan due to a decrease in concentrations and plume size as a result of corrective action (see Section E-5 above). Remediation goals are currently set to background for all wells and constituents. If additional constituents of concern (COCs) are detected during Appendix IX analyses, the detected COCs will be added to the Groundwater Protection Standard in accordance with Part 264.99.

Initially in the 1993 permit modification application, MW-5, MW-8, and one POC well were sampled semi-annually and MW-12, MW-13, and MW-14 were sampled annually. Appendix IX samples were collected annually from one of the POC wells on a rotating basis. According to the 1996 permit modification application, MW-5 was changed to annual sampling (due to non-detect concentrations) and newly installed well MW-18 was added to the semi-annual list. In addition, MW-8, MW-12, MW-13, and MW-14 were moved to the bi-annual schedule due to historic non-detect concentrations. The 2018 permit modification required semi-annual sampling of all POC wells (refer to the table in section E5 above).

Metals have historically been detected during Appendix IX sampling including maximum concentrations of arsenic [0.031 milligrams per liter (mg/L)], barium (0.46 mg/L), chromium (0.11 mg/L), lead (0.014 mg/L), vanadium (0.023 mg/L), and zinc (0.14 mg/L). From 1982 to 1985 iron was also present in all samples and low levels of mercury (0.0002-0.0004 mg/L) were detected. Metals have not been added to the facility's Groundwater Protection Standard list because they were not part of the former process of the closed surface impoundment, appear to be naturally occurring, and are attributed to suspended sediment in the groundwater.

Groundwater Monitoring Program (40 CFR 270.14(c)(8)(iv);264.100(d))

The Post-closure groundwater monitoring program consists of semi-annual sampling of selected monitoring wells to evaluate current conditions and the status of corrective action efforts. During each sampling event, all of the monitoring wells are gauged to determine groundwater depth for calculation of elevations. This data is added to a table with historic elevation measurements to observe trends over time. Section E-5, above, details the sampling plan.

Description of Groundwater Monitoring System (40 CFR 270.14(c) (7)(v),(8))

The monitoring well network utilized in evaluating the effectiveness of the corrective action system is described in Sections E-6 and Section E-9, above.

The locations of the monitoring wells are shown in Section B as **Figure B4**. Additional temporary and permanent monitoring wells may be proposed in the future to aid in plume delineation for corrective action development.

Description of Sampling & Analysis Procedures (40 CFR 270.14(c) (7)(v),(8))

The current sampling program consists of semi-annual sampling for analysis of VOCs and SVOCs for wells MW-4B, MW-9, MW-11, MW-15, MW-16, MW-17, MW-18, MW-19, and MW-20 (not yet installed). Monitoring wells MW-3, MW-3B, MW-5, MW-6, MW-7, MW-8 and MW-10 are sampled for VOCs and SVOCs biennially. Monitoring wells MW-4B, MW-15, MW-16, and MW-17 are sampled biennially for Appendix IX parameters. Groundwater monitoring procedures are provided in Section E-6.

Monitoring Data & Statistical Analysis Procedures (40 CFR 270.14(c) (7)(v),(8))

Monitoring data for all wells is reviewed in accordance with the Quality Assurance/Quality Control (QA/QC) procedures described in Section E-6. These procedures include the implementation of an internal QA/QC Plan followed by EnviroRisk personnel to ensure the integrity of the data collected during each sampling event. The QA/QC Plan includes requirements for experience of field personnel, record keeping, chain-of-custody documentation, sample equipment, sample preservation, sample shipping and handling, and evaluation of quality control data. Quality control samples collected during each sampling event include trip blanks, equipment blanks, and field duplicates. A QA/QC review including an evaluation of the quality control samples is performed prior to reporting the sample data to the EPD. If necessary, re-sampling and analysis will be performed.

Until corrective action objectives are achieved, background concentrations of regulated constituents are assumed to be equivalent to practical quantitation levels (PQLs) reported by the laboratory.

Reporting Requirements (40 CFR 270.14(c)(7);264.100(g))

Semi-annual monitoring reports will be submitted to EPD during corrective action within 60 days of the receipt of laboratory analytical results. These reports will describe the field and analytical results of the sampling events and the effectiveness of the corrective action program. The following information will be provided as shown in the italicized sections:

- *Introduction*: provides a description of the facility and relevant background information along with a summary of activities performed for the reporting period.

- *Sampling Methods*: provides a description of groundwater depth measurements and field sampling and analysis procedures along with QA/QC sampling performed.
- *Site Hydrogeological Conditions*: includes a description of recent groundwater depths and calculated elevations shown in updated tables. Potentiometric surface maps will be prepared using the new data and used to determine flow direction, hydraulic gradients, and flow velocities.
- *Analytical Results*: includes a tabulated summary of VOCs and SVOCs detected along with supporting iso-concentration maps and concentration versus time graphs. Dioxins and Appendix IX sampling results are also provided, as dictated by the sampling schedule. Laboratory reports and field sampling sheets are provided as appendices.
- *Conclusions*: includes a summary of hydrogeological findings, groundwater sampling data and trends, corrective action effectiveness, and recommendations for any improvements needed.

E-10 References

The following references from published sources were utilized during preparation of Section E:

Arora, R., ed., 1984, *Hydrogeologic Evaluation for Underground Injection Control in the Coastal Plain of Georgia*: Georgia Geologic Survey Hydrologic Atlas 10,41 plates.

Barker, J.F. and Patrick, G.C., 1985, *Natural Attenuation of Aromatic Hydrocarbons in a Shallow Sand Aquifer*, *Proceedings of the Petroleum Hydrocarbons and Organic Chemicals in Groundwater: Prevention, Detection, and Restoration Conference, Houston, Tx*, pp. 160-177.

Batu, Vedat, 1998, *Aquifer Hydraulics*, John Wiley & Sons, Inc., New York, 727p.

Bouwer, H. and Rice, R.C., 1976, *A Slug Test Method for Determining Hydraulic Conductivity of Unconfined Aquifers with Completely or Partially Penetrating Wells*, *Water Resources Research*, 12-3, pp. 423-428.

Bouwer, H., 1989, *The Bouwer and Rice Slug Test - An Update*, *Groundwater*, vol. 24, no. 3, pp. 304-309.

Clark, W. Z., Jr. and Arnold, C. Z., *Physiographic Map of Georgia*, Department of Natural Resources, Geologic and Water Resources Division, Georgia Geologic Survey, 1976.

EPA Region IV, *Field Branches Quality System & Technical Procedures (FBQSTP)*, Science and Ecosystem Support Division, *Operating Procedure (SESDPROC)*, dated April 26, 2017

Fetter, C. W., 1988, *Applied Hydrogeology*, 2nd Edition, Macmillan Publishing Company, New York, 592 p.

Freeze, R.A., and Cherry, J.A., 1979, Groundwater: New Jersey, Prentice Hall, Inc., 604 p.

Georgia Environmental Protection Division, Hazardous Waste Management Branch, Atlanta, GA, open file review.

Herrick, S. M., 1961, *Well Logs of Coastal Plain of Georgia*: Georgia Geologic Survey Bulletin 70, 462 p.

Kruseman, G. P. and DeRidder, N. A., 1990, *Analysis and Evaluation of Pumping Test Data*, International Institute for Land Reclamation and Improvement, Publication 47, Wageningen, The Netherlands, 377 p.

LeGrand, Harry E. (1989), *A Conceptual Model of Ground Water Settings in the Piedmont Region*, in *Ground Water in the Piedmont*, Charles c. Daniel III et. al. eds., Clemson University, Clemson, SC, 317-327.

Lohman, S. W., 1972, *Ground-Water Hydraulics*, Professional Paper 708, U.S. Department of the Interior, Geological Survey, 67 p.

Tanner, J.D., et al, *Geologic Map of Georgia*, Department of Natural Resources, Geologic and Water Resources Division, Georgia Geologic Survey, 1976.

Wiedemeier, T. H., 1999, Natural Attenuation of Fuels and Chlorinated Solvents in the Subsurface, John Wiley & Sons, Inc., New York, NY, p. 617

Historical Reports and Files provided by Manor Timber Company.

**Table E1. Dioxin Results
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)**

SAMPLE ID	DATE	PENTA CDD	HEXA CDD	HEXA CDF	PENTA CDF	TCDD	TCDF	Total HpCDD	Total HpCDF	OCDD	OCDF
MW-17	7/23/2009	<0.0062	<0.0075	<0.0059	<0.0043	<0.0036	<0.0024	0.069	<0.0061	0.35	<0.011
MW-16	7/15/2010	<0.00377	0.439 Q	0.945 Q	82.9 Q	<0.00863	75.7 Q E	NA	NA	NA	NA
MW-17	8/8/2014	0.154	0.161	0.28	3.52	0.0608	166.0	NA	NA	NA	NA
MW-15	5/25/2019	<0.005	<0.0033	0.0097	<0.0029	<0.0012	<0.0015	0.06	0.049	0.29	0.38
MW-17	6/29/2022	<0.05	<0.05	<0.05	<0.05	<0.01	4.9	<0.05	<0.05	<0.01	<0.01

Notes:

ng/L= All data reported in nanograms per liter (1 part per trillion)
 NA = not analyzed or reported by laboratory
 Data prior to 2019 was collected by previous consultant(s)
 Detections are shown in **bold**

BRL = Below reporting limits
 E = Estimated result, concentration exceeds calibration range
 Q = Estimated maximum possible concentration

**Table E2. Appendix IX Sample Data (MW-15)
 Manor Timber Company
 Manor, Clinch County, GA
 Permit Number: HW-047(D)**

Volatile Organics (SW8260B)	Quantity (µg/L)	CAS #
Toluene	1.1	108-88-3

Semi-Volatile Organics (SW8270D)	Quantity (µg/L)	CAS #
Acenaphthene	39.0	83-32-9
Fluorene	22.0	86-73-7
Naphthalene	31.0	91-20-3

Metals (SW6020A)	Quantity (mg/L)	CAS #
Barium	0.093	7440393

IC Anions (SW9056)	Quantity (mg/L)	CAS #
Fluoride	0.13	16984-48-8

Notes:

MW-15 was sampled on May 25, 2019 per the Permit requirements.

CAS # = Chemical Abstract Number

Only compounds with detections are listed. Sample was analyzed for Appendix IX parameters.

Table E2. Appendix IX Sample Data (MW-17)
Manor Timber Company
Manor, Clinch County, GA
Permit Number: HW-047(D)

Volatile Organics (SW8260B)	Quantity (µg/L)	CAS #
Toluene	120	108-88-3
Acetone	140	67-64-1
Benzene	31.0	71-43-2
Ethylbenzene	30.0	100-41-4
Styrene	7.2	100-42-5
Xylenes	70.0	1330-20-7

Semi-Volatile Organics (SW8270D)	Quantity (µg/L)	CAS #
Acenaphthene	400	83-32-9
Fluorene	240	86-73-7
Naphthalene	5,200	91-20-3
2,3,4,6-Tetrachlorophenol	110	58-90-2
2,4,5-Trichlorophenol	52.0	95-95-4
2,4-Dimethylphenol	300	105-67-9
2-Methylnaphthalene	530	91-57-6
2-Methylphenol	160	95-48-7
3,4-Methylphenol	450	65794-96-9
Acenaphthylene	11.0	208-96-8
Acetophenone	73.0	98-86-2
Dibenzofuran	240	132-64-9
Pentachlorophenol	240	87-86-5
Phenanthrene	140	85-01-8
Phenol	140	108-95-2

Metals (SW6020A)	Quantity (mg/L)	CAS #
Barium	0.208	7440-39-3
Zinc	0.0312	7440-66-6

Sulfide (SW9030B)	Quantity (mg/L)	CAS #
Sulfide	5.40	18496-25-8

Notes:

MW-17 was sampled on June 29, 2022 per the Permit requirements.

CAS # = Chemical Abstract Number

Only compounds with detections are listed. Sample was analyzed for Appendix IX parameters.

SECTION F. PROCEDURES TO PREVENT HAZARDS

The information provided in this section is submitted in accordance with the requirements of 40 CFR 270.14 and 264.14. Other regulations addressed to complete this section include 264.15, 264.17, 264.174, 264.194, and 264.254.

This section generally addresses the following subject areas: general security, inspection schedule, request for a waiver of preparedness and prevention requirements, spill prevention, containment, and countermeasures plan; and prevention of accidental ignition or reaction of ignitable, reactive, or incompatible wastes. Inspection forms are included as an attachment as **Forms 1-8**. The findings of these inspections and observations will be recorded in the appropriate field forms and maintained in the facility operation record.

F1. Post-Closure Plan

The regulations governing closure of waste disposal sites, as contained with Federal Regulations in 40 CFR 264 and as adopted by the Georgia Hazardous Waste Management Rules, include requirements for post-closure care. These include inspection, maintenance, and groundwater monitoring. This Post Closure Care Plan for the closed Waste Management Area (WMA) includes inspection, monitoring, and maintenance activities that have already been performed since 1989. These activities will continue to be performed in accordance with the above cited regulations. The post-closure care period is expected to continue until the end of the compliance period as specified in 40CFR264.94.

F2. Inspection Plan

The following features are subject to inspection during the post-closure period:

- Security control devices;
- Erosion damage;
- Cover settlement, subsidence, and displacement;
- Vegetative cover conditions;
- Integrity of the WMA fence; and
- Well conditions.

The post-closure care of the closed WMA system will be conducted during the post-closure care period. Upon any permanent shut-down of the MTC facility, the post-closure care for the closed facility at the MTC site will be conducted primarily by the post-closure contact person. During continued plant operation, the Plant Manager will function as the contact person. The current Plant Manager is Mr. Samuel Henderson.

The on-site contact person will be provided with necessary inspection equipment by MTC. This equipment will be used by the on-site contact person to perform the inspection, monitoring, and maintenance tasks.

Although additional assistance is not expected, outside assistance may be required, if, for some reason, major maintenance activities become necessary. The post-closure cost estimates that are included are based on the assumption that some outside assistance may be necessary through the post-closure period.

F3. Cover Inspection

MTC will conduct monthly (and after major rainfall) inspections of site access and security systems (i.e., fences and gates), the cover integrity, including vegetative cover condition, potential erosion damage and cover subsidence. The WMA fence will be inspected to ensure that the integrity of the system has not been comprised. The results of the inspections and any corrective action taken will be placed on inspection log sheets provided as **Forms 1-8**. During plant shutdowns, the periodic inspections will be conducted by the plant watchman.

F4. Groundwater Monitoring System Inspections

The following features related to the groundwater monitoring system will be subject to the inspection and maintenance monthly and during semi-annual groundwater sampling events conducted during the post-closure care period:

- Groundwater monitoring wells;
- Monitoring well covers;
- Locks; and
- Integrity of surface seals.

Surface grout around the monitoring wells will be replaced or repaired if significant cracks or loose or missing grout are observed. Monitoring wells will be resurveyed if there is any noticeable change in the well, such as subsidence, moved protector pipe, etc. The monitoring wells will be kept locked when not in use. Missing or broken padlocks or caps will be replaced, as needed.

The results of the inspections will be placed in an inspection log which is included as **Form 2**. The inspection log will also provide for reporting any variances noted and remedial action taken.

F5. Monitoring Plan

The current post-closure groundwater monitoring program covered under the existing Hazardous Waste Management Permit for the closed WMA is discussed in Section B. Based on the historical data collected from this groundwater monitoring program, a revised groundwater monitoring program for the post-closure period may be proposed at a later date.

F6. Maintenance Plan

The contact person will be responsible for maintenance activities at the closed WMA. Additional labor and equipment operators may be needed occasionally, and their costs have been included in the post-closure cost estimate. Maintenance activities at the closed WMA will be triggered by problems/deficiencies which will be noted in the monthly inspections for the cover or during the groundwater monitoring inspections. Observations of the problem/deficiencies which could result in initiation of one or more of the following maintenance activities (as appropriate):

- Repair of security control devices;
- Erosion damage repair; and
- Correction of settlement, subsidence, and displacement;
- Mowing, fertilization, and other vegetative cover maintenance; or
- Well repair or replacement.

F7. Post-Closure Security

The WMA was closed in a manner that controls and minimizes or eliminates, to the extent necessary to prevent threats to human health and the environment, post-closure escape of hazardous waste of hazardous constituents to groundwater or surface water or to the atmosphere. In general, the performance standard was achieved by removing liquids and bottom sludges, and stabilizing remaining contaminated soil and residual sludges, and is being ensured by the construction of a low-permeability liner and cap.

During the post-closure period, it is important that means and methods be maintained to keep unauthorized persons out of the closed WMA area. When the facility is not open, the entrance road gates are closed and locked. All site personnel are instructed to report any unusual activities or security incidents to a supervisor, who may in turn contact the police. All visitors are instructed to report to the plant office.

In addition to the entrance gates, MTC access is physically controlled by a fence and a railroad/ditch to the north, wooded area to the east, a ditch to the south, and a swamp to the west. A separate fence encloses the WMA. Signs are posted and maintained on each side of the closed WMA. The warning signs read "DANGER- UNAUTHORIZED PERSONNEL KEEP OUT". The signs are legible from a distance of 25 feet and are posted at all directions of approach. The plant security devices and procedures control access to the closed WMA.

F8. Post-Closure Contact

The post-closure contact for the facility during the post-closure period is:

Mr. Samuel Adam Henderson, Plant Manager - Manor Timber Company, 102 Black Ankle Rd, Manor, GA 31550, (912) 487-2621.

INSPECTION REPORT DESCRIPTIONS (FORMS 1 THROUGH 8)

FORM 1- CLOSED SURFACE IMPOUNDMENT

This form is completed each monthly by the Plant Manager, Mr. Henderson, or his representative.

FORM 2- MONTHLY GROUNDWATER MONITORING WELL INSPECTION

This form is completed monthly by Mr. Henderson or an employee. Those items needing action are addressed by project personnel.

FORM 3- MONTHLY GROUNDWATER MONITORING WELLS

This inspection is normally performed by Mr. Henderson each month and displays depth to water differences compared to the prior month. Rainfall is also shown on this form as are the meter readings from each recovery well.

FORM 4- TESTS FILTRATION SYSTEMS

The effluent from the recovery wells is monitored monthly at the outfall to anticipate when new carbon is required. This form and the analysis are completed monthly by Mr. Henderson and are reported on this form.

FORM 5 – MONTHLY PUMPING REPORTS

This form is generated monthly and shows the summary of the months pumping per well and the total for the system. An explanation sheet is attached identifying the various items. The monthly report summarizes the daily pumping reports. All are prepared by Mr. Henderson.

FORMS 6-8

These records are prepared either daily or on other schedules to assure compliance with hazardous waste clean-up and storage regulations. They are completed by the treatment area managers and are reviewed by Mr. Henderson to assure compliance.

TESTING AND INSPECTION ACTIVITIES - MANOR TIMBER COMPANY

PURPOSE	FREQUENCY	FORM	PERSONNEL
Site Control: gates, locks, access	Daily (1)	None	Watchman or Site Personnel
Closed Surface Impoundment	Monthly and after rainstorms	1	Site Personnel
Monthly Ground Water Monitoring Well Inspection	Monthly	2	Site Personnel; 3rd Party (semi-annual)
Monthly Ground Water Level Reading	Monthly	3	Site Personnel; 3rd Party (semi-annual)
Remediation Filtration System	Daily (2)	4	Site Personnel; 3rd Party (semi-annual)
Monthly Pumping Reports	Daily (2)	5	Site Personnel; 3rd Party (semi-annual)
Drum Storage/Accumulation (Hazardous Waste)	Weekly	6	Site Personnel; 3rd Party (semi-annual)
Door Sump Inspection	Daily (workdays)	7	Site Personnel; 3rd Party (semi-annual)
Drip Pad Inspection	Weekly (Thurs)/ Annually	8	Site Personnel; 3rd Party (semi-annual)

(1) Access to the site is controlled by gates which are locked except during plant operation (normal working hours).

(2) Meters are read at the beginning of each workday and results are summarized in the Monthly Report. The entire remediation system is inspected at this time and any deficiencies noted/repared.

FORM 1

MANOR TIMBER COMPANY, INC.
CLOSED SURFACE IMPOUNDMENT
MONTHLY INSPECTION REPORT

FENCES: _____

VEGETATION: _____

VISIBLE SIGNS OF BORROWING ANIMALS () YES () NO

VISIBLE SIGNS OF SINK HOLES () YES () NO

VISIBLE SIGNS OF ANT MOUNDS () YES () NO

ANT MOUNDS TREATED () YES () NO

VISIBLE SIGNS OF EROSION () YES () NO

ARE WARNING SIGNS POSTED () YES () NO

IS THE SECURITY FENCE INTACT () YES () NO

IS FENCE GATE IN GOOD WORKING CONDITION () YES () NO

ARE LOCKS WORKING AND IN GOOD CONDITION () YES () NO

ARE GROUNDWATER MONITORING WELL PADS NOT BROKEN () YES () NO

ARE GROUNDWATER MONITORING WELL LOCKS WORKING () YES () NO

INSPECTION DATE: _____

INSPECTED BY: _____

FORM 2

SIGNATURE OF INSPECTOR _____

DATE _____

"original"

MANOR TIMBER COMPANY

MONTHLY GROUND WATER MONITORING WELL INSPECTION

Date: _____ Time: _____ Inspector: _____ Temperature: _____ Weather: _____

WELL NUMBER	LOCKED (Y/N)	MARKED (Y/N)	VEGETATION PRESENT (Y/N)	VENTED (Y/N)	PAD CONDITION (DESCRIBE)	REMARKS
MW1						
MW1A						
MW3						
MW3B						
MW4B						
MW5						
MW6						
MW7						
MW8						
MW9						
MW10						
MW11						
MW12						
MW13						
MW14						
MW15						
MW16						
MW17						
MW 18						
Signature of Inspector						
MW 19						

FORM 3

MANOR TIMBER COMPANY, INC.
MONTHLY GROUND WATER MONITORING WELLS
DATE / / TIME TEMPERATURE F
WEATHER

	mw1	mw1A	mw3	mw3B	mw4B	mw5	mw6
DEPTH TO WATER							
difference prior month							
	mw7	mw8	mw9	mw10	mw11	mw12	mw13
DEPTH TO WATER							
difference prior month							
	mw14	mw15	mw16	mw17	mw18	mw19	mw
DEPTH TO WATER							
difference prior month							

YTD RAIN FALL _____ TIME FROM _____ TO _____

PUMPS	DATE / /	P-2	P-2	=	_____
PUMPS	DATE / /	P-3	P-3	=	_____
PUMPS	DATE / /	P-4	P-4	=	_____
PUMPS	DATE / /	RW1	RW1	=	_____
PUMPS	DATE / /	P-5	P-5	=	_____
EXP LINE	DATE / /	EXP	EXP	=	_____
METER M1	DATE / /	M1	M-1	=	_____
				TOTALS=	_____

SIGNATURE _____ date / / 20 _____

FORM 4

Manor Timber Company

Test

Filtration Systems

Date _____

Time _____ () am () pm

Incoming Line _____ Filter Tank _____

Test Results

Exit Line _____ Gallons Tested _____

Comments: _____

Signed by _____

Manor Timber Company Inc

Loc sft

FORM 5

MONTHLY PUMPING REPORTS
EXPLANATION OF COMMENTS

- (1) End of period – meters read in the morning; actually indicates reading at end of the previous reading date (i.e., pumpage through 26th).
- (2) Date of beginning – meters read about 0730 to 0900 hours on this date.
- (3) Indicates individual pumps proportion of total pumpage for period.
- (4) Individual pump gallons for the period.
- (5) Pump 4 – Well MW4A
Pump 5 – shown P-5 is well RW2
- (6) RW1R – Recovery Well 1 (Replacement)
- (7) EXP/P – total pumped from filter system – meter of outflow from filter.
- (8) M1 – total pumped from filter system, previously used to provide processing water quantities – also at outflow. This number should be the same as EXP/P since no recovered water is used for process.
- (9) T-Pump – This number should reflect total of each individual meter reading.
- (10) No water has been stored or used in production due to excess iron content.

MANOR TIMBER COMPANY, INC.
WEEKLY RECORD OF DRUMS STORAGE ON SITE AT MANOR
TIMBER COMPANY, INC.

DATE _____ 20 _____

DRUM STORAGE AREA

TIME _____ ()AM ()PM

NUMBER OF DRUMS _____

LEAK ()YES ()NO
IF YES ACTION TAKEN TO CORRECT THIS PROBLEM

TIME _____ ()AM ()PM

REPORTED TO _____ DATE _____ 20 _____

CORRECTION DATE _____ DATE _____ 20 _____ -TIME ()AM ()PM

ACCUMULATION STORAGE AREA

DATE _____ 20 _____

TIME _____ ()AM ()PM

NUMBER DRUMS _____

LEAK ()YES ()NO
IF YES ACTION TAKEN TO CORRECT THIS PROBLEM _____

CORRECTION DATE _____ 20 _____

TIME _____ ()AM ()PM

TYPE OF CORRECTION _____

TYPE OF REPAIRS _____

PERSON MAKING THE REPAIR _____

SIGNED BY _____ DATE _____ 20 _____

FORM 7

MANOR TIMBER COMPANY INC.
102 BLACK ANKLE ROAD
MANOR, GEORGIA 31550

REF.#40-264 SUBPART J DOOR SUMPS

DATE _____ 20 _____

SUMP PUMPS CRESOTE DOOR

PUMP WORKING YES NO

IF NO REASON _____

REPAIRED _____

SUMP PUMPS CCA-C DOOR

PUMP WORKING YES NO

IF NO REASON _____

REPAIRS _____

MANOR TIMBER COMPANY, INC.

INSPECTED BY: _____ DATE _____ 20 _____

SECTION G. CONTINGENCY PLAN

This section does not apply to this facility per 40 CFR 270.14(b)(3).

SECTION H. PERSONNEL TRAINING

This section is optional and is not being included.

SECTION J. SOLID WASTE MANAGEMENT UNITS (SWMU)

No SWMU's have been identified at the facility.

SECTION J. SOLID WASTE MANAGEMENT UNITS (SWMU)

No SWMU's have been identified at the facility.

SECTION K. OTHER FEDERAL LAW 40 CFR 270.3

a) THE WILD AND SCENIC RIVERS ACT

This law is not applicable to the Manor Timber Company facility as it poses no adverse effect on the established values for national wild and scenic rivers.

b) THE NATIONAL HISTORIC PRESERVATION ACT OF 1966

This law is not applicable to the Manor Timber Company facility as it does not pose any adverse effect on properties listed or eligible for listing in the National Register of Historic Places.

c) THE ENDANGERED SPECIES ACT

This law is not applicable to the Manor Timber Company facility since it is located in an urban setting and does not appear to pose an environmental concern to the continued existence of any endangered or threatened species.

d) THE COASTAL ZONE MANAGEMENT ACT

The U.S. Congress passed the Coastal Zone Management Act (CZMA) in 1972 which included select areas within 250 miles of the coastal zone. This act, administered by the National Oceanic and Atmospheric Administration (NOAA), provides for the management of the nation's coastal resources, including the Great Lakes. The goal is to "preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone." The Georgia Coastal Management Program was approved by NOAA in 1998, with Georgia's Department of Natural Resources, Coastal Resources Division, serving as the lead agency. The Georgia Coastal Management Act authorized the creation of the Georgia Coastal Management Program. The Georgia coastal zone includes the state's six coastal counties and five "inland tier" counties, including Chatham, Effingham, Bryan, Liberty, McIntosh, Long, Glynn, Wayne, Brantley, Camden, and Charlton counties.

Since the facility is located in Clinch County, this act is not applicable.

e) THE FISH AND WILDLIFE COORDINATION ACT

This law is not applicable to the Manor Timber Company facility as it does not authorize the impoundment, diversion, or other control or modification of any body of water.

SECTION L. GEOLOGY CERTIFICATION


**PART-B RENEWAL APPLICATION FOR POST
CLOSURE CARE AND CORRECTIVE ACTION
JULY 2022 PART B PERMIT RENEWAL**

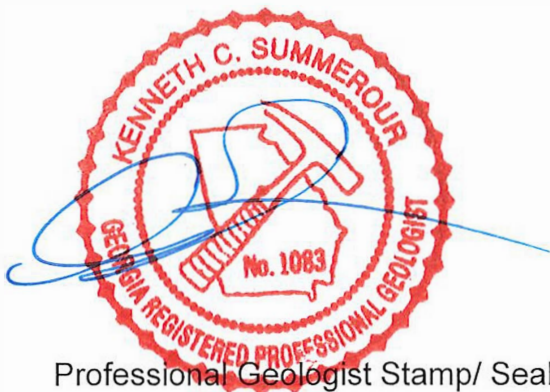
**MANOR TIMBER COMPANY
102 BLACK ANKLE ROAD, MANOR, CLINCH COUNTY
PERMIT NO. HW-047 (D)**

GEOLOGY CERTIFICATION

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

Date : 6/28/2023


Kenneth C. Summerour, P.G. #1083
Registered Professional Geologist



Professional Geologist Stamp/ Seal