UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

FSS3
35194

4WD-WPB MAR 24 1992

Mr. Richard A. Abraham
AEGIS Insurance Service, Inc.
Harborside Financial Center
700 Plaza Two
Jersey City, NJ 07311-3994

RE: 4-RIN-0708-92
Rome Coal Tar Pit/GAD981002983
West Florida Natural Gas/FLD982119729
Palatka Gas Works/FLD981932007
Durham Coal Gasification/986176938
CNCO

Dear Mr. Abraham:

This is in response to your Freedom of Information Act (FOIA) request for information referenced above from Region IV files.

Please find enclosed a copy of the records you requested. The costs for compiling the requested information total $31.60. Copies of the "Bill for Collection" and "Notice of Fee Schedule and Payment Procedures" are enclosed. Please remit payment in the above amount within 30 days of the date of this response to the following address:

U.S. Environmental Protection Agency
P.O. Box 100142
Atlanta, Georgia 30384
RE: 4-RIN--0708-92

To ensure proper credit, your check should reference the above RIN number. Your prompt remittance of the amount indicated will be appreciated.

Should you have any questions, please call Gerald F. Foree or Cathy Amoroso at (404) 347-5065.

Sincerely yours,

H. Kirk Lucius
Freedom of Information Coordinator

Enclosure

AMOROSO FOREE VILLAMARZO HANKE LUCIUS

CA:GF:m:03-17-92x5065 Disk: Amoroso Doc: 708.foi

JUN 28 1989

4WD-SISB

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED

JUN 29 1989

Environmental Protection Division
Land Protection Branch

Mr. John Taylor, Chief
Land Protection Branch
Georgia Department of Natural Resources
205 Butler Street, SW
Atlanta, Georgia 30334

RE: Rome Coal Tar Pit
Rome, Floyd County, Georgia
GAD981002983

Dear Mr. Taylor:

This is to inform you that the subject site has been assigned a No Further Remedial Action Planned (NFRAP) designation. The reason for this designation is the low Preliminary Hazardous Ranking System (HRS) score calculated for this site.

Please be advised that the NFRAP designation is based on information currently available and conditions and policies that currently exist.

It is possible that in the future our investigation of the site may be reactivated if new information or policies warrant such an action.

Should you have any questions, please contact me at (404) 347-5065.

Sincerely,

Mario E. Villamarzo
Georgia Project Officer
Site Assessment Section

cc: Murray Warner, NUS

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

February 11, 1988

Ms. Carolyn Thompson
Techlaw Inc.
1900 The Exchange, N.W.
Suite 415
Atlanta, GA 30339

Dear Ms. Thompson:

Per our telephone conversations of February 4, 1988, please find enclosed a copy of the Site Investigation Program file on the Rome Coal Tar Pit site (EPA ID# GAD981002983).

If I can be of further assistance, please don't hesitate to call me at (404) 656-7404.

Sincerely,

Marlin R. Gottschalk

Marlin R. Gottschalk, Ph.D.
Unit Corrdinator
Site Assessment Unit

MRG/sdh/075

cc: File - Rome Coal Tar Pit

A10
RAU

FIB

ENVIRONMENTAL PROTECTION DIVISION
Industrial and Hazardous Waste Management Program
ACTION REPORT

ACTION BY:	CHARLES P. EVANS	REVIEWED BY:	RECORDED BY:
SEQUENCE NUMBER:	475	DATE REVIEWED: 6/4	DATE RECORDED: 6-12-85

FACILITY NAME:	Rome Coal Tar Pit	FACILITY ID NO:	GAD981002983
MAIL STREET:		MAIL CITY:	Rome
MAIL STATE:	MAIL ZIP:	LOCATION PHONE:	SIC CODE:
MAIL CONTACT: MR. MS.	FIRST NAME:	LAST NAME:	
LOCATION CITY:		LOCATION COUNTY:	
ACTIVITY CODE: A10	MAJOR (M):	COMPLIANCE OFFICER:	EVANS
PERMIT NUMBER OR STATUS:		GROUNDWATER STATUS CODE:	

PROCESS CODES	T01 TANK	T02 SF IM	T03 INCIN	T04 OTHER	S01 CONT	S02 TANK	S03 WS PL	S04 SF IM	D80 LD FL	D81 LD AP	D83 SF IM
IN USE											

AREA OF VIOLATION:	GWM	INC	CLO	MAN	FIN	SCH	PTB	OTH
CLASS OF VIOLATION:								

ACTION TAKEN: 38 Conduct Preliminary Assment		DATE OF ACTION: 850500	
FINDING/ DECISION: 86 Additional Info Action Required		FIELD HOURS: 0	TOTAL HOURS: 50
NEXT ACTION:		FOLLOW-UP DATE:	

ACTION TAKEN (2):		DATE OF ACTION (2):	
FINDING/ DECISION (2):		FIELD HOURS (2):	TOTAL HOURS (2):
NEXT ACTION (2):		FOLLOW-UP DATE (2):	

PROJECTED CEASED VIOLATION DATE:	PENALTY ASSESSED: $	PENALTY COLLECTED: $

ADDITIONAL DOCUMENTATION WILL BE PREPARED. YES (✓) NO ( ) (CHECK ONE)

COMMENTS:

Attached PA

2/20/84

ENVIRONMENTAL PROTECTION DIVISION
Industrial and Hazardous Waste Management Program

ACTION REPORT

ACTION BY:	Claude Goodley	REVIEWED BY:	[illegible]	RECORDED BY:	[illegible]
SEQUENCE NUMBER:	4 73	DATE REVIEWED:	5/28	DATE RECORDED:	

FACILITY NAME:	Rome I / Coal Tar Pit / E. C. Sys			FACILITY ID NO:	
MAIL STREET:	P.O. Box 68			MAIL CITY:	Roswell
MAIL STATE:	Ga	MAIL ZIP: 30075	LOCATION PHONE:	404 993 4500	SIC CODE:
MAIL CONTACT:	MR. / MS.	FIRST NAME:	Mike	LAST NAME:	Wrobel
LOCATION CITY:	Rome			LOCATION COUNTY:	Floyd
ACTIVITY CODE:	A10	MAJOR (M):		COMPLIANCE OFFICER:	C. Goodley
PERMIT NUMBER OR STATUS:				GROUNDWATER STATUS CODE:	

PROCESS CODES	T01 TANK	T02 SF IM	T03 INCIN	T04 OTHER	S01 CONT	S02 TANK	S03 WS PL	S04 SF IM	D80 LD FL	D81 LD AP	D83 SF IM
IN USE											

AREA OF VIOLATION:	GWM	INC	CLO	MAN	FIN	SCH	PTB	OTH
CLASS OF VIOLATION:								

ACTION TAKEN:	10 Conduct Followup Inspection	DATE OF ACTION:	850517
FINDING/ DECISION:	86 additional Action Required	FIELD HOURS: 12	TOTAL HOURS: 15
NEXT ACTION:		FOLLOW-UP DATE:	

ACTION TAKEN (2):		DATE OF ACTION (2):	
FINDING/ DECISION (2):		FIELD HOURS (2):	TOTAL HOURS (2):
NEXT ACTION (2):		FOLLOW-UP DATE (2):	

PROJECTED CEASED VIOLATION DATE:	PENALTY ASSESSED: $	PENALTY COLLECTED: $

ADDITIONAL DOCUMENTATION WILL BE PREPARED. YES ( ) NO ( ) (CHECK ONE)

COMMENTS:

2/20/84

JWB

ENVIRONMENTAL PROTECTION DIVISION
Industrial and Hazardous Waste Management Program

ACTION REPORT

ACTION BY:	C. Goodley	REVIEWED BY:	JW	RECORDED BY:	Lm
SEQUENCE NUMBER:	NEW	DATE REVIEWED:	5/2	DATE RECORDED:	5/14/85

FACILITY NAME:	Roman I / E.C. Systems - John Davenport Dump			FACILITY ID NO:	NEW
MAIL STREET:	800 Mansell Rd P.O. Box 68			MAIL CITY:	Roswell
MAIL STATE:	Ga	MAIL ZIP: 30077	LOCATION PHONE:	404/993 4500	SIC CODE:
MAIL CONTACT:	MR. (circled) / MS.	FIRST NAME:	Mike	LAST NAME:	Wrobel
LOCATION CITY:	Rome			LOCATION COUNTY:	Floyd
ACTIVITY CODE:	A10	MAJOR (M):		COMPLIANCE OFFICER:	Claude Goodley
PERMIT NUMBER OR STATUS:				GROUNDWATER STATUS CODE:	

PROCESS CODES	T01 TANK	T02 SF IM	T03 INCIN	T04 OTHER	S01 CONT	S02 TANK	S03 WS PL	S04 SF IM	D80 LD FL	D81 LD AP	D83 SF IM
IN USE											

AREA OF VIOLATION:	GWM	INC	CLO	MAN	FIN	SCH	PTB	OTH
CLASS OF VIOLATION:								

ACTION TAKEN:	~~[illegible]~~	DATE OF ACTION:	~~850430~~
FINDING/ DECISION:	~~[illegible]~~	FIELD HOURS: ~~5~~	TOTAL HOURS: ~~9~~
NEXT ACTION:		FOLLOW-UP DATE:	

ACTION TAKEN (2):	10 Followup insp.	DATE OF ACTION (2):	850430
FINDING/ DECISION (2):	88 CERCLA SITE Existo	FIELD HOURS (2): 5	TOTAL HOURS (2): 9
NEXT ACTION (2):		FOLLOW-UP DATE (2):	

PROJECTED CEASED VIOLATION DATE:	PENALTY ASSESSED: $	PENALTY COLLECTED: $

ADDITIONAL DOCUMENTATION WILL BE PREPARED. YES ( ) NO ( ) (CHECK ONE)

COMMENTS:

2/20/84

A10
KAV

FIB

ENVIRONMENTAL PROTECTION DIVISION
Industrial and Hazardous Waste Management Program
ACTION REPORT

ACTION BY:	CHARLES P. EVANS	REVIEWED BY:	RECORDED BY:
SEQUENCE NUMBER:	~~[illegible]~~ 475	DATE REVIEWED: 6/4	DATE RECORDED: 6-12-85

FACILITY NAME:	Rome Coal Tar Pit	FACILITY ID NO:	GAD981002783
MAIL STREET:		MAIL CITY:	Rome
MAIL STATE:	MAIL ZIP:	LOCATION PHONE:	SIC CODE:
MAIL CONTACT: MR. MS.	FIRST NAME:	LAST NAME:	
LOCATION CITY:		LOCATION COUNTY:	
ACTIVITY CODE: A10	MAJOR (M):	COMPLIANCE OFFICER:	EVANS
PERMIT NUMBER OR STATUS:		GROUNDWATER STATUS CODE:	

PROCESS CODES	T01 TANK	T02 SF IM	T03 INCIN	T04 OTHER	S01 CONT	S02 TANK	S03 WS PL	S04 SF IM	D80 LD FL	D81 LD AP	D83 SF IM
IN USE											

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ACTION TAKEN (2):		DATE OF ACTION (2):	
FINDING/ DECISION (2):		FIELD HOURS (2):	TOTAL HOURS (2):
NEXT ACTION (2):		FOLLOW-UP DATE (2):	

PROJECTED CEASED VIOLATION DATE:	PENALTY ASSESSED: $	PENALTY COLLECTED: $

ADDITIONAL DOCUMENTATION WILL BE PREPARED. YES (✓) NO ( ) (CHECK ONE)

COMMENTS:

Attached PA

2/20/84

RECORD OF COMMUNICATION

☐ PHONE CALL ☑ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO:	FROM:	DATE
[illegible]	[illegible]	[illegible]
		TIME [illegible]

SUBJECT

[illegible]

SUMMARY OF COMMUNICATION

[illegible]

CONCLUSIONS, ACTION TAKEN OR REQUIRED

[illegible]

INFORMATION COPIES
TO: [illegible]

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

On May 16, 1985, I arrived on site and found that the equipment was arriving. Lisa Burton, TAT, Roy F. Weston, was on site monitoring ambient air (background). Ms. Burton would monitor every hour at a minimum, but more often once excavations into the coal tar waste in the pit were begun.

HAZTECH had two subcontractors working on this project. The heavy equipment was provided and operated by Corman, Inc. of Kentucky. The trucking company used by HAZTECH on this project is Robbie D. Woods, Dalomite, Alabama.

Excavation of the pit began at 9:00 a.m. and continued until 5:30 p.m. Two trucks arrived at 2:00 p.m. and loading of these trucks began immediately. They were properly limed, lined and covered. I completed my notification of the public officials by visiting the County Manager Office and talking with Richard McCullough, leaving him a fact sheet.

On May 17, 1985 at 8:00 a.m. the work continued at the Coal Tar Pit. The material in the pit had become extremely viscous. The coal tar appeared as if it was crude oil. There was also a large amount of water which had run off into the pit from rains. "Posilime" was added to the pit to thicken the material. About 4:00 p.m., the bottom of the pit was exposed. It was brick lined and appeared to be in good condition. There did not appear to be any infiltration of water into the bottom of the pit from groundwater. Eight trucks arrived at 11:50 a.m. and were loaded starting at 1:00 p.m. The last truck left Rome, Georgia at 6:30 p.m. heading for Emelle, Alabama.

Note: The pit was constructed by having a steel tank placed on top of an outside layer of bricks and a layer of bricks placed inside the steel tank.

Work began on May 18, 1985 at 8:00 a.m. Ten trucks had arrived the previous night. Eight trucks were loaded at the Coal Tar Pit concluding pit excavations. "Posilime" was deposited into the pit. The ground around the pit was scraped and the soil loaded onto the last truck.

Work began on May 19, 1985 at 8:30 a.m. at the John Davenport Drive Site. Ten trucks had arrived the previous night. Loading of these trucks began about 9:00 a.m. Georgia Rock, Inc. had allowed Lisa Burton of TAT to use the scales on Sunday due to her qualified operation of the scales the previous day. The John Davenport Site was cleaned up and contaminated soil removed at 2:50 p.m. The last truck was weighed at 2:00 p.m. and departed for Emelle, Alabama.

Mr. J. C. Sizemore was contacted at his home and told that the work was concluded. Mr. Sizemore asked if he could start work next week on his parking lot. I told him he could fill in the pit and do site preparation. I stated I would contact my supervisor for the go ahead to pave his lot.

Conclusions:

Site has been cleaned up.

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Conclusions:

Site has been cleaned up.

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER
Division Director

May 15, 1985

Mr. Michael Wrobel
Vice President/Properties
E. C. Systems, Inc.
P. O. Box 68
800 Mansell Road
Roswell, Georgia 30077

RE: Rome Coal Tar Pit/John Davenport Drive Site

Dear Mr. Wrobel:

Relative to the subject sites, we are in receipt of your letter of May 1, 1985 and the laboratory analysis report of the sludge present at both sites performed by your consultant Harmon Engineering & Testing (Auburn, Alabama).

Based upon the fact that this waste is chemically and physically similar to waste listed as hazardous in the Georgia Rules for Hazardous Waste Management and since it contains significant amounts of hazardous constituents we have declared the material a hazardous waste as defined in Section 261.32 of the Georgia Rules.

Further, since your letter indicated a financial inability of E. C. Systems, Inc. to effect an immediate removal of the waste or a remedial investigation of the environmental threat these sites may be posing, we have referred the situation to the U.S. Environmental Protection Agency for waste removal under the "Superfund" program. A copy of our transmittal letter is enclosed for your information.

We will continue to assess the nature and the impact these sites present to the surrounding environment and advise you accordingly of your further responsibilities.

Should you have any questions feel free to contact me at (404)656-7404.

Sincerely,

Joseph T. Surowiec
Unit Coordinator
Remedial Action Unit

JTS/mcw003
Enclosure
cc: John D. Taylor
File - Rome I Coal Tar Pit (B)

AN AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

May 14, 1985

Mr. Thomas Devine
Mr. Robert Caplan
Ms. Susan Fields
Environmental Protection Agency
Atlanta, GA

HAND DELIVERED

Re: Tar Pit; West Second Avenue
Rome, Georgia and Dump Site
John Davenport Drive, Rome,
Georgia

Gentlemen:

This letter is to acknowledge receipt of your correspondence of this date with a copy of an Administrative Order, including findings of facts and conclusions of law attached thereto.

After due consideration of the Administrative order, it is the position of E. C. Systems, Inc. that our company is in no position financially or physically to proceed with the directives as outlined in that order. We therefore request that the Environmental Protection Agency proceed immediately with such excavation, clean up, or other activity as they have outlined in said Administrative Order using the "super fund".

We will continue to cooperate fully with you as we all attempt to resolve this unfortunate situation.

E. C. SYSTEMS, INC.

BY: _____
MICHAEL WROBEL
Vice President

MW/smr

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV

IN THE MATTER OF:	)	
	)	
COAL TAR PIT	)	
WEST SECOND AVENUE	)	
and	)	
CONTAMINATED MATERIAL	)	DOCKET NO. 85-14-C
JOHN DAVENPORT ROAD	)	
ROME, GEORGIA	)	
	)	
E. C. SYSTEMS, INC.	)	
	)	
Respondent	)	
	)	

ORDER PURSUANT TO SECTION 106(a) OF THE
COMPREHENSIVE ENVIRONMENTAL RESPONSE,
COMPENSATION AND LIABILITY ACT, 42 U.S.C. §9606(a)

The following ORDER is issued to E. C. Systems, Inc., (Respondent) pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. §9606(a), and delegated to the Administrator of the Environmental Protection Agency (EPA) by Executive Order 12316 dated August 14, 1981, 46 Federal Register 42237 (1981) and further delegated to the Regional Administrator of Region IV, EPA. Notice of the issuance of this ORDER has been given to the State of Georgia.

EPA has determined that there may be an imminent and substantial endangerment to the public health and welfare and the environment due to the release and threat of a release of hazardous substances as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14) from the following locations (the "Sites"):

> An abandoned subterranean coal tar pit located on property at 102 West Second Avenue in Rome, Georgia, and contaminated excavated material which was hauled to an area off John Davenport Road in Rome, Georgia.

This ORDER directs you to undertake action to protect the public and the environment from the endangerment.

FINDINGS OF FACT

1. Respondent owns a parcel of land located at 102 West Second Avenue in Rome Georgia.

2. During construction activities on the property on or about April 12, 1985, Respondent unearthed an abandoned subterranean coal tar pit. Several truck

loads of material from the pit were excavated and transported to an area off John Davenport Road outside of Rome. The coal tar pit located on the Respondent's property and the excavated material off John Davenport Road are hereinafter referred to as the "Sites".

3. After review of analysis of the waste, the Georgia Environmental Protection Division (EPD) has determined that the material in the coal tar pit, and the material which was excavated and dumped off John Davenport Road, are hazardous wastes due to the presence of phenols, naphthalene, fluoranthene, chrysene, acenapthylene, and other aliphatic hydrocarbons.

4. Phenol is a tumor promoter in laboratory animals. Dermal contact can result in corrosion of the skin. Inhalation causes central nervous system disorders such as weakness or dizziness, and edema in the lungs. Damage to the liver kidney, pancreas, and spleen have also been observed after inhalation. Ingestion causes gastrointestinal distress and corrosion of the lips, mouth, tongue, esophagus, and stomach.

5. Chrysene is a demonstrated carcinogen in laboratory animals.

6. The Sites are in a highly populated area. Access to the Sites is unrestricted and the wastes present on-site are not secured.

7. The pit located off Second Avenue in Rome is within two hundred feet of the Coosawaula River. The material off John Davenport Road is within the drainage area of Little Dry Creek.

CONCLUSIONS OF LAW

1. Respondent is a person as defined in Section 101(21) of CERCLA, 42 U.S.C. §9601(21).

2. Respondent is an owner within the meaning of Section 101(20) of CERCLA, 42 U.S.C. §9601(20).

3. The Site is a facility within the meaning of Section 101(9) of CERCLA, 42 U.S.C. §9601(9).

4. The substances found on-site, including phenols, naphthalene, chrysene and fluoroanthene are "hazardous substances" as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

5. The presence of hazardous substances at the Sites, as well as their migration to surrounding soils and potential migration to groundwater and surface water, constitutes the release and threat of release within the meaning of Section 101(22) and 106(a) of CERCLA, 42 U.S.C. §9601(22) and §9606(a).

DETERMINATIONS

Based on the foregoing FINDINGS OF FACT AND CONCLUSIONS OF LAW, and the entire record of this proceeding, the Regional Administrator has determined that 1) The release and threat of release from the Sites may present an imminent and substantial endangerment to the public health or welfare or environment 2) In order to protect public health and welfare or the environment, it is necessary that action be taken to mitigate the release and threat of release of hazardous substances from the Sites into the environment; and 3) The actions required in this ORDER are consistent with the National Contingency Plan.

ORDER

Based on the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW, AND DETERMINATIONS it is hereby ORDERED that

1) Respondent shall initiate by no later than May 28, 1985, and complete within thirty (30) working days thereafter, the following measures, which shall be undertaken at the direction and approval of EPA through its On-Scene Coordinator (OSC) and consistent with the National Contingency Plan:

   a) Excavate all coal tar and contaminated soil from the pit located off West Second Avenue in Rome, Georgia.

   b) Transport and dispose of at an approved hazardous waste disposal facility, all excavated material and contaminated soil. This would include both the material removed from the pit and the material now stored off John Davenport Road.

2. All actions carried out by Respondent pursuant to this ORDER shall be done in accordance with all applicable federal, state, and local laws.

3. Upon request, Respondent will provide EPA with split samples of any samples collected in accordance with the requirements of this ORDER.

4. All response work performed pursuant to this ORDER shall be under the direction and supervision of a qualified professional engineer or certified geologist with expertise and experience in hazardous waste site cleanup. Respondent shall notify EPA as to the name and address of such engineer or geologist and of any contractors and subcontractors to be used in carrying out the terms of this ORDER in advance of their involvement at the Sites.

5. Respondent shall consult with EPA in planning for sampling and analysis. Respondent shall provide a quality control report to EPA certifying that all activities have been performed as approved.

6. Access to the Sites shall be provided to EPA employees, its contractors, and consultants for the purpose of carrying out any necessary actions related to this removal action.

7. Nothing herein shall constitute or be construed as a satisfaction or release from liability for any conditions or claims arising as a result past, current or future operations or ownership of the Sites by the Respondent, his agents, contractors, lessees, successors, or assigns.

8. Notwithstanding compliance with the terms of this ORDER, Respondent may be required to take further actions as necessary to abate the endangerment posed by conditions at the Sites

9. In the event that the OSC determines that activities implemented under this ORDER, or any other circumstances or activities are creating an imminent and substantial endangerment to the health and welfare of the people on the Sites or in the surrounding area or to the environment the Regional Administrator of EPA, Region IV, may order Respondent to halt further implementation of this ORDER for such period of time as necessary to abate the endangerment.

10. The United States shall not be liable for any injuries or damages to persons or property resulting from acts or omissions by the Respondent, his employees agents, or contractors in carrying out activities pursuant to this ORDER, nor shall the federal government be held as a party to any contract entered into by the Respondent or his agents in carrying out activities pursuant to this ORDER.

11. All submittals and notifications to EPA pursuant to this ORDER shall be made to Mr. Thomas W. Devine, Director, Waste Management Division, U. S. Environmental Protection Agency, 345 Courtland Street, N.E., Atlanta, Georgia 30365, and Mr. Robert W. Caplan, Office of Regional Counsel, at the same address.

12. This ORDER is effective upon receipt notwithstanding any conference requested by Respondent

13. This ORDER shall apply to and be binding upon the parties to this action, their officers, directors, agents, employees, successors, assigns, and contractors.

OPPORTUNITY FOR CONFERENCE

Except as provided below, this ORDER is effective upon receipt. With respect to those actions required above you must notify EPA by telegram or by telephone within two (2) days after receipt of this Order, with follow-up written confirmation, within forty-eight (48) hours of initial notice whether you intend to comply with the terms of this ORDER. In addition, if you wish to confer with EPA to discuss this Order, its applicability to you, the correctness of any factual determinations upon which the ORDER is based, the appropriateness of any action which you are ordered to take, and any other relevant and material issue, you may request an informal conference at the EPA Regional Office located at 345 Courtland

Street, N.E., Atlanta, Georgia. Such a request must be made by telegram or by telephone within two (2) days after receipt of this ORDER. Respondent may appear in person or by attorney or other representative at any conference held at his request. However, you are hereby placed on notice that, notwithstanding any request for a conference, EPA will take any action which may be necessary in the opinion of EPA for the protection of public health and welfare and the environment and that Respondent may be liable under Section 107(a) of CERCLA, 42 U.S.C. §9607 for the costs of these actions. Any request for a conference should be made to

Mr. Herold Taylor
Waste Management Division
Emergency & Remedial Response Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
(404) 881-2930

or

Mr. Robert W. Caplan
Office of the Regional Counsel
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
(404) 881-2641

VIOLATIONS OF ORDER

Violation of this ORDER by the Respondent through willful violation or failure or refusal to comply with this ORDER, or any portion thereof, may subject you to a civil penalty of up to $5,000 for each day in which such violation occurs or such failure to comply continues pursuant to Section 106(b) of CERCLA, 42 U.S.C. §9606(b). Failure to comply may also subject Respondent to civil penalties and/or punitive damages in an amount of three times the amount of any costs incurred by the United States as a result of such failure as provided in Section 106(b) and 107(c)(3) of CERCLA, 43 U.S.C. §9606(b) and §9607(c)(3). Nothing herein shall preclude EPA from taking such other actions as may be necessary to protect the public health and welfare or the environment and recovering the costs thereof.

DATE: _____ BY: _____
JACK E. RAVAN
REGIONAL ADMINISTRATOR

ITASTOR.pga-05-10-85

RECEIVED

MAY 22 1985

REMEDIAL ACTIONS UNIT

MAY 14 1985

RECEIVED

4WD-FF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ENVIRONMENTAL PROTECTION DIVISION
NATURAL RESOURCES

Mr. Michael Wrobel
L. C. Systems, Inc.
Vice President, Properties
300 Mansell Road
Roswell, Georgia 30077

RECEIVED

MAY 20 1985

Re: Coal Tar Pit
102 West Second Avenue
Rome, Georgia

ENVIRONMENTAL PROTECTION DIVISION
LAND PROTECTION BRANCH

Dear Mr. Wrobel

Please find enclosed an Administrative Order requiring you to perform certain actions at the above referenced site. This Order is issued pursuant to Section 106 of the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. §9606. If you have any questions, please contact Robert W. Caplan of my staff at (404) 881-2041.

Sincerely yours,

Jack T. Ravan
Regional Administrator

Enclosure

cc Harold Reheis
Georgia Environmental Protection Division

bcc Larry Weiner, OWPP
Marcia English, OPC
Bob Caplan - ORC
Sue Fields- IPRB

4WD-FF	4WD-FR	4WD-FR	4ORC	4WD-FR	4WD-FR	WMD	4ERA	4RA
TAYLOR	COLE	FIELDS	CAPLAN	GREEN	SMITH	DEVINE	LITTLE	RAVAN

HTAYLOR:pga 05-10-85

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

Mr. Jay Kaplan
Area Sales Manager
Chemical Waste Management, Inc.
2110 Newmarket Parkway Suite 111
Marietta, GA 30067

Dear Mr. Kaplan:

Per our telephone conversation of May 10, I am writing to request that Chemical Waste Management, Inc. consider the U.S. EPA the generator for the waste which your personnel sampled during the week of April 15, 1985, for E.C. Systems, Inc. in Rome, Georgia. Our EPA Generator ID number is GA3680090005. In anticipation of starting a clean up of this waste later this week, I also request that you consider the samples already in your possesion to be representative of the waste and base your approval for disposal of the waste at your facility in Emelle, Alabama on analysis performed by your staff. I am including additional data on the waste as an attachment of this letter.

The waste contains coal tar from a facility which reportedly produced coal gas from the late 1800's to the 1930's. The material has been in storage in a subterranean cylinder until recently unearthed. The cylinder, located at 102 West Second Avenue in Rome, contains approximately 160 cubic yards of waste and construction debris. Approximately 140 cubic yards of the material were dumped outside of Rome and will be included in the waste stream. The waste will be transported to your facility in bulk via tractor-trailer dumps.

Transportation and disposal of the waste will be coordinated by Jack Scott of HazTech. He can be reached at 404-981-9332. Please contact either Jack or me when the waste is approved for disposal. Thank you for your assistance in this matter.

I herby certify that all information submitted in this and all attached documents is complete and accurate, and that all known or suspected hazards have been disclosed.

Susan Fields
Susan Fields
On-Scene Coordinator

Date: May 14, 1985

Mlinge - Terry
234-8516

UPS # OSA E 66901

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER

May 9, 1985

Mr. Jack E. Ravan
Regional Administrator
EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Jack:

Members of my staff have recently investigated, jointly with EPA Region IV personnel, a site in Floyd County named the Rome I Coal Tar Pit. Analysis of the waste discovered buried there indicates a similarity to K087 waste as defined in Section 261.32 of the Federal RCRA regulations and the Georgia Rules for Hazardous Waste Management. Additionally, a portion of this waste was excavated by the local contractor on site and removed to another location identified as the John Davenport Drive site.

Given the fact that this waste is chemically and physically similar to K087 and since it contains significant amounts of the constituents for which K087 waste is listed in the regulations (naphthalene and phenol) we feel that the waste is hazardous. Since both site locations pose a potential threat to heavily populated areas and the Oostanaula River, we are requesting that EPA consider the use of "Superfund" resources to remove the waste from both locations and transport the material to a secure landfill.

My staff will continue its investigation into the history of the site and work with the responsible parties to complete a remedial site assessment and investigation into prior releases into soils and groundwater.

Please advise me if you need additional information or assistance.

Sincerely,

Harold F. Reheis

for J. Leonard Ledbetter
Commissioner

JLL:js:w036

RECEIVED
MAY 10 1985

HARMON ENGINEERING & TESTING
SCIENTISTS • ENGINEERS • CONSTRUCTORS
AUBURN INDUSTRIAL PARK AUBURN, ALA. 36830-4399
205 821-8250

RECEIVED
MAY 9 1985
REMEDIAL ACTIONS UNIT

April 29, 1985

Mr. Mike Robel
EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Re: Analysis of Sludge from Rome, Georgia Project
HE&T Project No. 623-05

Dear Mr. Robel:

In accordance with the verbal instructions of Jim Kendrick, Harmon Engineering & Testing (HE&T) has completed the analysis of a sludge sample collected by Mr. Kendrick from the "tar pit" unearthed in Rome, Georgia. The data sheet is attached.

Testing was performed according to the State of Georgia Hazardous Waste Management Regulations given at 391-3-11.07. These tests showed that the hazardous waste characteristics of EP Toxicity, ignitability, reactivity and corrosivity were all negative.

Additional testing was done to determine if the waste contained any of the so-called "Appendix VIII" compounds. The sample was extracted in a soxhlet apparatus using toluene; this extraction was diluted and analyzed by gas chromatography mass spectroscopy (GCMS). The results indicated that the principal components of the sample were polynuclear aromatic hydrocarbons and aliphatic hydrocarbons. These results indicate that EPD can classify the waste as hazardous.

We are continuing to discuss this situation with soils engineering firm and can, if you desire, provide complete turnkey studies to meet the EPD requirements. If you have any questions, please feel free to call on us.

Sincerely,

HARMON ENGINEERING & TESTING

Mark Shearon
Vice President
Environmental Division

MS:vn

Enclosure

HARMON ENGINEERING & TESTING

AUBURN INDUSTRIAL PARK, AUBURN, AL 36830-4399 (205) 821-9250

LABORATORY RESULTS

EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Attention: Mike Robel

HE&T PROJECT 623-05

DATE SAMPLE RECEIVED 4-19-85

DATE DATA TRANSMITTED 4-29-85

CLIENT JOB REFERENCE Sludge from Rome, Georgia

E.P. TOXICITY METALS

HE&T Sample Number	Client Sample Identification	As mg/L	Ba mg/L	Cd mg/L	Cr mg/L	Hg mg/L	Pb mg/L	Se mg/L	Ag mg/L
1587	Tar Sludge	0.02	<0.5	<0.02	0.06	<0.001	<0.02	<0.005	<0.02

		Corr. (pH) S.U.	Reactivity +or-	Ignitability °C	Phenols mg/kg	Total Cyanides mg/kg	Sulfides mg/kg	PCB mg/kg
1587	Tar Sludge	7	Neg.	>60	1678	5.9	<10	<10

Organic Analysis of Toluene Extract

		Component	Percentage Estimated of Extract
1587	Tar Sludge	Napthalene	40
		Fluoranthene	6
		Chrysene	15
		Acenapthylene	2
		Aliphatic/Other Hydrocarbons	Balance

Approved for Transmittal

Terence A. Whitt/MS

Laboratory Manager

E. C. SYSTEMS, INC.
800 Mansell Road
P.O. Box 68
Roswell, Georgia 30077
(404) 993-4500

RECEIVED
MAY 3' 1985
REMEDIAL ACTIONS UNIT

May 1, 1985

Mr. Joseph T. Surowiec
Unit Coordinator
Georgia Department of Natural Resources
3420 Norman Berry Drive
Hapeville, Georgia 30354

RE: Rome Tar Pit

Dear Mr. Surowiec:

Thank you for the time and information you and your staff provided Mr. Robbins and myself at your offices on Thursday, April 25th.

I have today received from Harmon Engineering & Testing the analysis of material contained in the subject Tar Pit site. With this letter and copy of the attached report I hope to adequately respond to your letter of April 25th, whereby you have requested specific information and commitments. Your item #1 is concerned with identification of the sludge material, accordingly I refer to the 2nd paragraph of the H.E.&T. report. Hopefully this will alleviate the need for your request item #2.

As I have previously stated for the record, E. C. Systems has had to bear the extensively costly effects of this untimely episode. At this time it needs to be recognized by all interested parties that E.C. Systems does not have the financial wherewithal to pursue additional investigation into the surrounding geology of the Tar Pit site. I would like to propose that the small amount of material that was removed (erroneously) can be brought back and reburied in the original containment enclosure.

I would like to point out that the immediately surrounding soils, because of their proximity to the "original" production site, are more than likely contaiminated with the residuals and therefor doing a stratigraphic profile would not be conclusive. In fact, a random sampling from anywhere on the site would at this late date be subject to wide interpretation as to where and when, if any, contamination occured. Additionally,

as is well known locally, the entire Broad Street, Downtown, Rome area, was filled and grade adjusted with fill of undetermined origin. Total elevation changes in some areas of over fifteen feet.

We have concluded that further testing on the site is not financially feasible and would not lead to any valid conclusions. Therefor we intend to return to the original pit site those materials from John Davenport Drive, fill and seal the containment pit and proceed with paving the parking lot. We do not believe this will violate any existing laws or regulations, and certainly believe this will in no way adversly affect the environment.

We expect to reexcavate the John Davenport site and return the material to the original location on May 8th and request your presence and your continued assistance as we resolve this unfortunate matter.

Sincerely,

Mike Wrobel
Vice President/Properties

MW/pb

Enclosures

cc: Susan M. Fields
James A. Robins, Jr.
Mark Shearon
James L. Kendrick

State Digest

Man sought in missing couple's case

From Staff and Wire Dispatches

DIAL — GBI agents and a Fannin County deputy will travel to Ohio next week in search of information about a man last seen with a missing Fannin County couple, officials said Wednesday.

GBI Agent Roy Harris said the trip is planned to follow up on leads concerning Lynn Wilson Green, 40.

Green was last seen with Karen Kauffman on April 15, the day she and her husband, Richard, were reported missing.

The Kauffmans lived in Ohio before moving to Fannin County about eight years ago, Harris said. Green's car is registered in Ohio.

No trace of the couple has been found despite several searches. A search of the couple's farm turned up $25,000, five pounds of marijuana and 14 weapons, including a Soviet-made assault rifle.

Official guilty in tax case

SAVANNAH — A federal court jury here deliberated less than three hours Wednesday before finding a Savannah-Chatham County School Board member guilty of tax fraud.

Isaiah McIver, 54, a school board member and professor of social and behavioral sciences at Savannah State College, was convicted of claiming his dead mother as an exemption on tax returns for 1978 through 1980.

For the same period, he was found guilty of claiming $9,000 in false charitable contributions, failing to report $32,815.36 in interest earnings and submitting 112 altered checks to support itemized deductions and employee business expense deductions totaling $38,500.

The jury of nine men and three women also convicted McIver of could draw as much as 10 years in prison and $16,000 in fines.

Man drowns in closed pool

ALBANY — A memorial service was held Wednesday for a Miami man who drowned in a swimming pool that had been closed for repairs, officials said.

Emmanuel David Griffin, 19, died while swimming with a group of students that climbed the fence around the pool at the Turner Job Corps Center on Tuesday afternoon.

Griffin's body was pulled from the pool by workers who had opened the gate to chase away the swimmers.

Dougherty County Coroner Bucky Brookshire ruled the drowning accidental, but details of how Griffin died were unavailable.

The Turner Job Corps Center is one of several centers operated around the nation to teach economically disadvantaged youths job skills.

[redacted]

ROME — Two, 30-foot pits unearthed a month ago in downtown Rome will be sealed and the surface paved under a decision this week by the state Environmental Protection Division.

"The worst is over. Now we can get back to business," said Jim Robbins, a Rome attorney representing EC Systems Inc., the Roswell company building the $2 million riverfront development where the pits were unearthed.

The EPD initially said that tar in the pits was "potentially hazardous" for long-term exposure. The pits contained coagulated tar, bricks and scrap lumber.

But further tests revealed that the material "will be safe" if it is sealed properly, said John Taylor, chief of EPD's land-protection division.

Pelham OKs liquor sales

PELHAM — Voters in Pelham [illegible] referendum to al-

Man arrested in alle

By Sam Hopkins
Staff Writer

The GBI, which had sought a young, black Cedartown victim of an alleged Ku Klux Klan beating for more than a year to identify his assailant, finally located him on a Navy aircraft carrier at sea and arrested a suspect on Wednesday.

Bill Padgett, head of the GBI's anti-terrorist squad, identified the suspect — Randall Wiley Smith, 23, of Villa Rica — as a Klan member. Smith was charged with aggravated assault and released on $5,000 bond, said Polk County Sheriff Jack Kirkpatrick.

The alleged beating took place early in April 1984 while the KKK was handing out li[illegible] town Cedartown, P[illegible]

Law enforcem[illegible] ceived criticism fr[illegible] because they had [illegible] rest sooner in th[illegible] Padgett said offici[illegible] not locate the [illegible] Carey, because h[illegible] Navy.

He said the F[illegible] police assisted in [illegible] ing that Carey wa[illegible] ty Hawk, an aircr[illegible]

After a photo[illegible] suspects was ma[illegible]

Video
Super
Super
Moms
Sale Prices Expire May 16, 198[illegible]
$248[illegible]
Mfr. Sugg. Price $329.90
Famous Name 19[illegible]
Color TV with Au[illegible]

SUE FIELDS

Tar pits ordered sealed

ROME — Two, 30-foot pits unearthed a month ago in downtown Rome will be sealed and the surface paved under a decision this week by the state Environmental Protection Division.

"The worst is over. Now we can get back to business," said Jim Robbins, a Rome attorney representing EC Systems Inc., the Roswell company building the $2 million riverfront development where the pits were unearthed.

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But further tests revealed that the material "will be safe" if it is sealed properly, said John Taylor, chief of EPD's land-protection division.

Rome I Site
Floyd Co.

Rome News-Tribune
145th Year—No. [illegible]
MONDAY, APR. [illegible]

Tar pit stalls 'Place'

Who's liable unresolved

By JEANNE [illegible]
Staff Writer

"What began as merely a [illegible] situation" at Rivers Place now [illegible] completion of the riverfront project.

A spokesman for EC Systems Inc., the firm building the Rome [illegible] interior-renovation project, said the tar pits unearthed three weeks ago at Rivers Place could cost the company in excess of $[illegible] to remove and [illegible] officials have a legal battleground where to place for burying the waste.

"This has severely hurt the project," said Jim Robbins, a Rome attorney acting as legal counsel for EC Systems Inc.

He said the June 1 grand opening for the first phase of the project — a [illegible] shopping mall, luxury apartments and a riverfront restaurant — is "[illegible] absolutely delayed."

"We're [illegible] with everyone, and [illegible] in uncertainty of [illegible] what will happen," Robbins said in an interview [illegible] the Rome News-Tribune.

"Unanticipated tar found beneath old two-lane pits was ruled as "potentially hazardous" for long-term [illegible] the Georgia Environmental Protection Division (EPD).

"We've been working closely with [illegible] to correct this problem, to remove [illegible] that, we're running up against [illegible] we have," Robbins said [illegible] the tar was discovered [illegible] construction [illegible] completed — was [illegible] the waste to privately owned [illegible] Davenport Drive. [illegible] said construction [illegible] "[illegible] a old dump" [illegible] would [illegible] workers [illegible]

"[illegible] as we're concerned, the [illegible] at 5400 Davenport Drive is one [illegible] responsibility," he said. "If we have to, we'll haul the tar back to Rivers Place and put it back in the pits where it was. Then, we'll make arrangements to have all of it taken away at one time."

Immediately, though, Robbins said officials are waiting for results from separate chemical-analysis tests on the tar

Please see Rivers, page 5

Rivers

[illegible] ty.

These tests will be used to support a scientific study of the ground surrounding the tar pits, he said. That study will be done by a private firm on contract with EC Systems Inc.

"That's where we are now," Robbins said. "We'll have to contract with a firm to complete a ground-level study of the land at Rivers Place."

Robbins said it could be 30 to 45 days before the firm begins such a study.

"Even before we begin to find out what we're up against, we're faced with a delay," he said.

But, at the heart of the issue, Robbins said, is who originally buried the tar in the pits, and who is legally responsible to remove it.

EPD officials earlier revealed that the tar was produced as a by-product of a coal-burning, gas-company operation around the turn of the century.

Although EC Systems Inc. officials have said that the company will take [illegible] responsibility for removing the tar, Robbins said the company only feels the [illegible] has [illegible] "[illegible] company." [illegible] wouldn't have [illegible] property if we had known [illegible]

NUS CORPORATION
1927 LAKESIDE PARKWAY
SUITE 814
TUCKER, GEORGIA 30084
404-938-7710

1553

C-586-6-9-49

6-7-89

received
JUN 07 1989
SISB/SAS

June 5, 1989

Mr. A. R. Hanke
Site Investigation and Support Branch
Waste Management Division
Environmental Protection Agency
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Date: 6/22/89
Site Disposition: CONCUR NFRAP
EPA Project Manager: [signature]

Subject: Screening Site Inspection, Phase I
Rome Coal Tar Pit
Rome, Floyd County, Georgia
EPA ID No. GAD981002983
TDD No. F4-8902-67

FILE

Dear Mr. Hanke:

FIT 4 conducted a Screening Site Inspection, Phase I, of the Rome Coal Tar Pit in Rome, Floyd County, Georgia. The investigation included a review of EPA and state file material, completion of a target survey, and a drive-by reconnaissance of the facility.

Rome Coal Tar Pit is located at 102 West Second Avenue in downtown Rome, Goergia. Historical information indicates the area was used by Rome Gas Works (Ref. 1). In 1928, Rome Gas Works transferred ownership to Atlanta Gas Light Company, which later sold the property to Battery Machine Company in 1942. Later, ownership was transferred to the Rome 1 Investment Company. The property is currently managed by E. C. Systems for Rome 1 (Ref. 1).

During the construction of the Rivers Place Shopping Center approximately 236 cubic yards of coal tar sludge were discovered in an in-ground concrete pit, which was lined with bricks (3-4 bricks thick) on the inside and outside. The integrity of the container is unknown (Refs. 1, 2). It is believed that Rome Gas Works generated the coal tar waste between 1880-1928 when they produced coal gas for the city (Refs. 1, 2). The pit sits on approximately 8-15 feet of fill material that was used to raise the streets above the flood plain (Ref. 3). After the pit was unearthed, approximately one-half of the coal tar was mixed with soil and dumped outside of Rome off John Davenport Road, and covered with plastic (Ref. 4). Construction debris was thrown on top of the sludge remaining in the pit (Ref. 5).

The coal tar sludge was chemically and physically similar to K087 as defined in the Federal RCRA regulations, and contained significant amounts of the K087 constituents, such as naphthalene and phenol (Ref. 6). The sludge was tested by Harmon Engineering & Testing and it was determined to be hazardous (Ref. 7).

The facility is approximately 75-100 yards from the Oostanaula River. Due to the proximity of the facility to a heavily populated area as well as the Oostanaula River, an emergency cleanup by the U.S. EPA was requested by the Georgia Environmental Protection Division (Ref. 1). Cleanup operations were performed in May 1985, and the removal of all but 10 tons of the waste was accomplished. Pozzalime was placed in the bottom of the pit to help solidify the remaining sludge. After cleanup operations were conducted, the pit was filled in and the area paved, and the shopping center completed (Ref. 1). The waste off of John Davenport Road was also removed. During the excavation of the coal tar sludge, groundwater was not encountered. The waste was sent to the Chemical Waste Management facility in Emelle, Alabama (Ref. 5).

The Rome Coal Tar Pit facility is located in the Valley and Ridge Physiographic Province of the Appalachian Valley Division in northwest Georgia. The facility is almost completely surrounded by the Oostanaula and Etowah Rivers. The area has a mild climate with an average January temperature of 43°F and an average July temperature of 80°F (Ref. 8). The net annual precipitation for the area is 15 inches (Ref. 9). The 1-year, 24-hour rainfall rate is 3.5 inches (Ref. 10). The elevation at the Rome Coal Tar Pit is approximately 590 feet (Ref. 11).

Underlying the pit area is the lower part of the Cambrian aged Conasauga Formation, which consists primarily of limestone. There are a few springs that discharge from the formation and average 1-20 gpm near Shannon and 200,000 gpd in Lindale. The average thickness of this lower unit is greater than 100 feet and is unconfined in the vicinity of the facility (Ref. 12). Beneath the Conasauga Formation is the Rome Formation, which consists of interbedded shale, siltstone, sandstone, and quartzite. The formation ranges from 500-1000 feet thick. Groundwater in the formation generally occurs in secondary openings produced by fracturing and jointing (Ref. 8). Underlying the Rome Formation is the Shady Dolomite, which consists of shale and dolomite. The formation is up to 100 feet thick and has very little potential as an aquifer (Ref. 8).

The depth of the water-table as observed in nearby wells, averages approximately 20-30 feet below land surface (Ref. 12). Though the shales in the formations may act as a confining unit locally, it is not considered continuous due to the heavy extent of fracturing and faulting in the area (Ref. 8). The groundwater flow direction is defined by local topography with the hydrologic gradient being towards streams and basins (Ref. 11). Since the facility is paved, there is no threat to groundwater (Ref. 13).

Surface water runoff from the facility flows north approximately 75-100 yards and enters the Oostanaula River. After approximately 900 feet, the Oostanaula River merges with the Etowah River which becomes the Coosa River (Ref. 11). Drinking water for the city of Rome is drawn from surface water. One intake is located on the Oostanaula River and the other on the Etowah River; both intakes are upstream of the facility (Ref. 130. There is recreational fishing in the Etowah, Oostanaula and Coosa rivers (Ref. 16).

The nearest resident to the facility is 0.3 mile south. A number of churches are within 2-3 blocks of the facility, with the closest about 850 feet away. Also, there is a Junior High School approximately 2,250 feet southeast of the facility (Ref. 11). No private wells were located during the 1989 facility reconnaissance except for some wells at Berry College, located approximately 1.3 miles from the pit area, which serve some individual residences in the mountains. The college has its own water

system which draws from surface water (Ref. 15). Within a 3-mile radius, the population is approximately 28,997 (Ref. 16).

Based on the results of this evaluation and the above referenced material, FIT 4 recommends that no further remedial action be planned for this facility. If you have any questions, please feel free to contact me at NUS Corporation.

Very truly yours,

Sheri Panabaker
Project Manager

Approved:

SP/kw

cc: Mario Villamarzo

REFERENCES

1. Potential Hazardous Waste Site Preliminary Assessment (EPA Form 2070-12) and attachments for Rome Coal Tar Pit. Filed by Charles P. Evans, DNR-EPD-RAU, May 29, 1989.

2. Sue Fields, EPA, Action memorandum to Jack Ravan, Regional Administrator, EPA, undated. Subject: Origin of coal tar.

3. Claude W. Goodley, Environmental Specialist, Remedial Action Unit, Remedial Action Fact Sheet, May 8, 1985.

4. Mike Higgins, Tennessee Department of Health and Environment logbook for Rome Coal Tar Pit. April 1985.

5. Sue Fields, onsite coordinator, EPA, OSC Report for Rome Coal Tar Pit, TDD F4-8505-05, May 16-19, 1985.

6. J. Leonard Ledbetter, Commissioner, DNR, letter to Jack E. Ravan, Regional Administrator, EPA, May 9, 1985. Subject: Coal tar classified as hazardous.

7. Mark Shearon, Vice President, Harmon Engineering & Testing, letter to Mike Robel, EC Systems, April 29, 1985. Subject: Test data for coal tar.

8. Charles W. Cressler, "Geology and Groundwater Resources of Floyd and Polk Counties, Georgia," Information Circular 39, 1970, pp. 4, 6, 8, 9, 10, 69, 78, 81, 82, map.

9. U.S. Department of Commerce, Climatic Atlas of the United States, (Washington, D.C.: GPO, June 1968) Reprint: 1983, National Oceanic and Atmospheric Administration.

10. David M. Hershfield, Rainfall Frequency Atlas of the United States, Technical Paper 40, (USDA, 1985), p. 93.

11. U.S. Geological Survey, 7.5 minute series Topographic Quadrangle Maps of Georgia: Rome North 1967 (Photorevised 1985), Rome South 1968 (Photorevised 1985), Shannon 1968 (Photorevised 1985), scale 1:24,000.

12. National Water Summary, USGS, Water Supply Paper 2275, 1984, pp. 180-182.

13. NUS Field Logbook No. F4-1285 for Rome Coal Tar Pit, TDD No. F4-8902-67. Documentation of facility reconnaissance, March 8, 1989.

14. Gary Besser, GA-DNR, Fisheries Division, telephone conversation with Sheri Panabaker, NUS Corporation, March 16, 1989. Subject: Fishing in the Etowah and Coosa Rivers.

15. David Goddard, Berry College Water Plant, telephone conversation with Geoffrey Carton, NUS Corporation, March 20, 1989. Subject: Details about Berry College water system.

16. United States Environmental Protection Agency, Graphical Exposure Modeling Systems (GEMS), Data Base, compiled from U.S. Bureau of Census Data, 1980.

EPA

Potential Hazardous Waste Site

Site Inspection Report

Site Inspection Report

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
GA	D981002983

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Rome Coal Tar Pit	North of the Intersection of Broad Street and 2nd Ave, Behind Battey Building

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Rome	GA	30161	Floyd	115	7

09 COORDINATES LATITUDE	LONGITUDE
34 15 12.5	085 10 22.5

10 TYPE OF OWNERSHIP (Check one)
- [X] A. PRIVATE
- [ ] B. FEDERAL _____
- [ ] C. STATE
- [ ] D. COUNTY
- [ ] E. MUNICIPAL
- [ ] F. OTHER _____
- [ ] G. UNKNOWN

III. INSPECTION INFORMATION

01 DATE OF INSPECTION (Month Day Year)	02 SITE STATUS	03 YEARS OF OPERATION
03 08 89	[ ] ACTIVE [X] INACTIVE	1880 (Beginning Year) | 1928 (Ending Year) ___ UNKNOWN

04 AGENCY PERFORMING INSPECTION (Check all that apply)
- [ ] A. EPA
- [X] B. EPA CONTRACTOR NUS Corporation (Name of firm)
- [ ] C. MUNICIPAL
- [ ] D. MUNICIPAL CONTRACTOR _____ (Name of firm)
- [ ] E. STATE
- [ ] F. STATE CONTRACTOR _____ (Name of firm)
- [ ] G. OTHER _____ (Specify)

05 CHIEF INSPECTOR	06 TITLE	07 ORGANIZATION	08 TELEPHONE NO
Sheri Panabaker	FIT Team	Region 4	404 938-7710

09 OTHER INSPECTORS	10 TITLE	11 ORGANIZATION	12 TELEPHONE NO
Geoffrey Carton	FIT Team	Region 4	(404) 938-7710
			( )
			( )
			( )
			( )

13 SITE REPRESENTATIVES INTERVIEWED	14 TITLE	15 ADDRESS	16 TELEPHONE NO
			( )
			( )
			( )
			( )
			( )
			( )

17 ACCESS GAINED BY (Check one)	18 TIME OF INSPECTION	19 WEATHER CONDITIONS
[ ] PERMISSION [ ] WARRANT	0915	≈50°F, overcast

IV. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NO.
Ken Lucas	EPA - Region 4	(404) 347-5065

04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NO.	08 DATE
Sheri L. Panabaker	FIT 4	NUS corp.	404-938-7710	04 12 89 (Month Day Year)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
GA	D981002983

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- A. SOLID
- B. POWDERS, FINES
- X C. SLUDGE
- D. OTHER _____ (Specify)
- E. SLURRY
- F. LIQUID
- G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS _____
CUBIC YARDS 236
NO. OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

- X A. TOXIC
- B. CORROSIVE
- C. RADIOACTIVE
- D. PERSISTENT
- E. SOLUBLE
- F. INFECTIOUS
- G. FLAMMABLE
- H. IGNITABLE
- I. HIGHLY VOLATILE
- J. EXPLOSIVE
- K. REACTIVE
- L. INCOMPATIBLE
- M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	236	CY	
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (Use additional for more substances using CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SLU	Coal tar sludge	999	LF	Unknown	—

V. FEEDSTOCKS (Use additional for more feedstocks)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA, State, FIT Files

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: GA
02 SITE NUMBER: D981002983

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 0
02 [ ] OBSERVED (DATE: _____) [X] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION
If it leaks from the container in the ground + migrates.

01 [X] B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 0
02 [ ] OBSERVED (DATE: _____) [X] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION
If it leaks from the container in the ground & migrates.

01 [ ] C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: _____
02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

01 [ ] D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: _____
02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

01 [ ] E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED: _____
02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

01 [X] F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: 0 (acres)
02 [ ] OBSERVED (DATE: _____) [X] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION
If it migrates up out of the container.

01 [ ] G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

01 [ ] H. WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED: _____
02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

01 [ ] I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: _____
02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: GA
02 SITE NUMBER: D981002983

II. HAZARDOUS CONDITIONS AND INCIDENTS Continued

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
03 POPULATION POTENTIALLY AFFECTED: _____
04 NARRATIVE DESCRIPTION
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION

EPA, state, FIT files

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION
PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

I. IDENTIFICATION
01 STATE: GA | 02 SITE NUMBER: D981002983

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED (Check all that apply)	02 PERMIT NUMBER	03 DATE ISSUED	04 EXPIRATION DATE	05 COMMENTS
☐ A. NPDES				
☐ B. UIC				
☐ C. AIR				
☐ D. RCRA				
☐ E. RCRA INTERIM STATUS				
☐ F. SPCC PLAN				
☐ G. STATE (Specify)				
☐ H. LOCAL (Specify)				
☐ I. OTHER (Specify)				
☐ J. NONE				

III. SITE DESCRIPTION

01 STORAGE/DISPOSAL (Check all that apply)	02 AMOUNT	03 UNIT OF MEASURE
☐ A. SURFACE IMPOUNDMENT		
☐ B. PILES		
☐ C. DRUMS, ABOVE GROUND		
☐ D. TANK, ABOVE GROUND		
☐ E. TANK, BELOW GROUND		
☐ F. LANDFILL		
☐ G. LANDFARM	236	yd3
☐ H. OPEN DUMP		
☐ I. OTHER (Specify)		

04 TREATMENT (Check all that apply)
- ☐ A. INCINERATION
- ☐ B. UNDERGROUND INJECTION
- ☐ C. CHEMICAL/PHYSICAL
- ☐ D. BIOLOGICAL
- ☐ E. WASTE OIL PROCESSING
- ☐ F. SOLVENT RECOVERY
- ☐ G. OTHER RECYCLING/RECOVERY
- ☐ H. OTHER (Specify)

05 OTHER
- ☐ A. BUILDINGS ON SITE

06 AREA OF SITE: 28' diam. / 14' depth (Acres)

07 COMMENTS

IV. CONTAINMENT

01 CONTAINMENT OF WASTES (Check one)
☐ A. ADEQUATE, SECURE ☐ B. MODERATE ☐ C. INADEQUATE, POOR ☐ D. INSECURE, UNSOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DIKES, LINERS, BARRIERS, ETC.

Most of the waste was removed and the area has been paved over.

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE: ☐ YES ☒ NO
02 COMMENTS

VI. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

EPA, State, FIT Files

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION
01 STATE: GA
02 SITE NUMBER: D981002983

II. DRINKING WATER SUPPLY

01 TYPE OF DRINKING SUPPLY (Check as applicable)

	SURFACE	WELL
COMMUNITY	A. ☒	B. ☐
NON-COMMUNITY	C. ☐	D. ☐

02 STATUS

ENDANGERED	AFFECTED	MONITORED
A. ☐	B. ☐	C. ☐
D. ☐	E. ☐	F. ☐

03 DISTANCE TO SITE
A. upstream (mi)
B. _____ (mi)

III. GROUNDWATER

01 GROUNDWATER USE IN VICINITY (Check one)

☐ A. ONLY SOURCE FOR DRINKING
☐ B. DRINKING (Other sources available) COMMERCIAL, INDUSTRIAL, IRRIGATION (No other water sources available)
☒ C. COMMERCIAL, INDUSTRIAL, IRRIGATION (Unless other sources available)
☐ D. NOT USED, UNUSEABLE

02 POPULATION SERVED BY GROUND WATER: 0

03 DISTANCE TO NEAREST DRINKING WATER WELL _____ (mi)

04 DEPTH TO GROUNDWATER: 20-30 (ft)

05 DIRECTION OF GROUNDWATER FLOW: N

06 DEPTH TO AQUIFER OF CONCERN _____ (ft)

07 POTENTIAL YIELD OF AQUIFER _____ (gpm)

08 SOLE SOURCE AQUIFER ☐ YES ☐ NO

09 DESCRIPTION OF WELLS (Including usage, depth, and location relative to population and buildings)

10 RECHARGE AREA
☐ YES
☐ NO
COMMENTS

11 DISCHARGE AREA
☐ YES
☐ NO
COMMENTS

IV. SURFACE WATER

01 SURFACE WATER USE (Check one)

☐ A. RESERVOIR, RECREATION DRINKING WATER SOURCE
☐ B. IRRIGATION, ECONOMICALLY IMPORTANT RESOURCES
☐ C. COMMERCIAL, INDUSTRIAL
☐ D. NOT CURRENTLY USED

02 AFFECTED/POTENTIALLY AFFECTED BODIES OF WATER

NAME:	AFFECTED	DISTANCE TO SITE
Oostanaula River	☐	250 ft (mi)
	☐	(mi)
	☐	(mi)

V. DEMOGRAPHIC AND PROPERTY INFORMATION

01 TOTAL POPULATION WITHIN

ONE (1) MILE OF SITE	TWO (2) MILES OF SITE	THREE (3) MILES OF SITE
A. 3800 (NO. OF PERSONS)	B. 19020 (NO. OF PERSONS)	C. 28997 (NO. OF PERSONS)

02 DISTANCE TO NEAREST POPULATION: 0.3 (mi)

03 NUMBER OF BUILDINGS WITHIN TWO (2) MILES OF SITE: _____

04 DISTANCE TO NEAREST OFF-SITE BUILDING: 60.1 (mi)

05 POPULATION WITHIN VICINITY OF SITE (Provide narrative description of nature of population within vicinity of site, e.g., rural, village, commercial, industrial, urban area)

The facility is located in downtown Rome and is surrounded by various businesses, the Oostanaula River is about 250 ft due North.

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION
01 STATE: GA | 02 SITE NUMBER: D981002983

VI. ENVIRONMENTAL INFORMATION

01 PERMEABILITY OF UNSATURATED ZONE (Check one)

☐ A. 10^{-6} - 10^{-8} cm/sec ☒ B. 10^{-4} - 10^{-6} cm/sec ☐ C. 10^{-4} - 10^{-3} cm/sec ☐ D. GREATER THAN 10^{-3} cm/sec

02 PERMEABILITY OF BEDROCK (Check one)

☐ A. IMPERMEABLE (Less than 10^{-6} cm/sec) ☐ B. RELATIVELY IMPERMEABLE (10^{-4} - 10^{-6} cm/sec) ☐ C. RELATIVELY PERMEABLE (10^{-2} - 10^{-4} cm/sec) ☐ D. VERY PERMEABLE (Greater than 10^{-2} cm/sec)

03 DEPTH TO BEDROCK	04 DEPTH OF CONTAMINATED SOIL ZONE	05 SOIL pH
_____ (ft)	_____ (ft)	_____

06 NET PRECIPITATION	07 ONE YEAR 24 HOUR RAINFALL	08 SLOPE: SITE SLOPE	DIRECTION OF SITE SLOPE	TERRAIN AVERAGE SLOPE
15 (in)	3.5 (in)	0 %		10 %

09 FLOOD POTENTIAL

SITE IS IN _____ YEAR FLOODPLAIN

10 ☐ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY

11 DISTANCE TO WETLANDS (5 acre minimum)

ESTUARINE: A. _____ (mi) OTHER: B. _____ (mi)

12 DISTANCE TO CRITICAL HABITAT (of endangered species)

_____ (mi)

ENDANGERED SPECIES: _____

13 LAND USE IN VICINITY

DISTANCE TO:

COMMERCIAL/INDUSTRIAL	RESIDENTIAL AREAS; NATIONAL/STATE PARKS, FORESTS, OR WILDLIFE RESERVES	AGRICULTURAL LANDS: PRIME AG LAND	AGRICULTURAL LANDS: AG LAND
A. 0.1 (mi)	B. 0.3 (mi)	C. _____ (mi)	D. _____ (mi)

14 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

The facility is located in downtown Rome. It is almost completely surrounded by Rivers, except for the east side. Various businesses surround the site area. Surface run-off is towards the north where it enters the Oostanaula River after approx. 250 ft.

VII. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA, State, FIT Files

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 8 - SAMPLE AND FIELD INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
GA	D980002933

II. SAMPLES TAKEN

SAMPLE TYPE	01 NUMBER OF SAMPLES TAKEN	02 SAMPLES SENT TO	03 ESTIMATED DATE RESULTS AVAILABLE
GROUNDWATER			
SURFACE WATER			
WASTE			
AIR			
RUNOFF			
SPILL			
SOIL			
VEGETATION			
OTHER			

III. FIELD MEASUREMENTS TAKEN

01 TYPE	02 COMMENTS

IV. PHOTOGRAPHS AND MAPS

01 TYPE ☒ GROUND ☐ AERIAL

02 IN CUSTODY OF NUS corporation

03 MAPS ☒ YES ☐ NO

04 LOCATION OF MAPS FIT Files

V. OTHER FIELD DATA COLLECTED

VI. SOURCES OF INFORMATION

EPA, State, FIT Files

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 7 - OWNER INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
GA	D981002983

II. CURRENT OWNER(S)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE
Rome I Investment Co.		800 Mansell Rd		Roswell	GA	30075

PARENT COMPANY

08 NAME	09 D+B NUMBER	10 STREET ADDRESS	11 SIC CODE	12 CITY	13 STATE	14 ZIP CODE

III. PREVIOUS OWNER(S)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE
Battery Machine Co.		unknown				

IV. REALTY OWNER(S)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE

V. SOURCES OF INFORMATION

EPA, State, FIT Files

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 8 - OPERATOR INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
GA	D981002983

II. CURRENT OPERATOR (Provide if different from owner)

01 NAME	02 D+B NUMBER
E.C. Systems	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
P.O. Box 68, 800 Mansell Rd	

05 CITY	06 STATE	07 ZIP CODE
Roswell	GA	30077

08 YEARS OF OPERATION	09 NAME OF OWNER

OPERATOR'S PARENT COMPANY (If applicable)

10 NAME	11 D+B NUMBER

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

III. PREVIOUS OPERATOR(S) (List most recent first; provide only if different from current)

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD

PREVIOUS OPERATORS' PARENT COMPANIES (If applicable)

10 NAME	11 D+B NUMBER

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD

10 NAME	11 D+B NUMBER

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD

10 NAME	11 D+B NUMBER

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

IV. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA, State, FIT Files

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 9 - GENERATOR/TRANSPORTER INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
GA	D98/002983

II. ON-SITE GENERATOR

01 NAME	02 D+B NUMBER
None	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

III. OFF-SITE GENERATOR(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
None			

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

IV. TRANSPORTER(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA, state, FIT files

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION
01 STATE: GA
02 SITE NUMBER: D981002983

II. PAST RESPONSE ACTIVITIES

01 ☐ A. WATER SUPPLY CLOSED — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ B. TEMPORARY WATER SUPPLY PROVIDED — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ C. PERMANENT WATER SUPPLY PROVIDED — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ D. SPILLED MATERIAL REMOVED — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☒ E. CONTAMINATED SOIL REMOVED — 02 DATE May, 1985 — 03 AGENCY HazTech
04 DESCRIPTION soil was mixed with the coal tar & the mixture cleaned up.

01 ☐ F. WASTE REPACKAGED — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☒ G. WASTE DISPOSED ELSEWHERE — 02 DATE May, 1985 — 03 AGENCY HazTech
04 DESCRIPTION Half the pit was excavated, soil mixed w/it, & it was deposited off of John Davenport Rd. Later it was removed.

01 ☐ H. ON SITE BURIAL — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ I. IN SITU CHEMICAL TREATMENT — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ J. IN SITU BIOLOGICAL TREATMENT — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ K. IN SITU PHYSICAL TREATMENT — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ L. ENCAPSULATION — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ M. EMERGENCY WASTE TREATMENT — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ N. CUTOFF WALLS — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ O. EMERGENCY DIKING/SURFACE WATER DIVERSION — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ P. CUTOFF TRENCHES/SUMP — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

01 ☐ Q. SUBSURFACE CUTOFF WALL — 02 DATE ____ 03 AGENCY ____
04 DESCRIPTION

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
GA	D981002983

II PAST RESPONSE ACTIVITIES (Continued)

01 ☐ R. BARRIER WALLS CONSTRUCTED — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ S. CAPPING/COVERING — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ T. BULK TANKAGE REPAIRED — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ U. GROUT CURTAIN CONSTRUCTED — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ V. BOTTOM SEALED — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ W. GAS CONTROL — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ X. FIRE CONTROL — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ Y. LEACHATE TREATMENT — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ Z. AREA EVACUATED — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ 1. ACCESS TO SITE RESTRICTED — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ 2. POPULATION RELOCATED — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

01 ☐ 3. OTHER REMEDIAL ACTIVITIES — 02 DATE _____ 03 AGENCY _____
04 DESCRIPTION

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA, State, FIT Files

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 11 - ENFORCEMENT INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
GA	D981002483

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY ENFORCEMENT ACTION ☐ YES ☒ NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA, State, FIT Files

EPA FORM 2070-13 (7-81)

E. POSSIBLE AFFECTED POPULATION AND RESOURCES

Pedestrians, workers and nearby residents may have been exposed to hazardous constituents of the waste via an airborne pathway. The structural integrity of the containment vessel is unknown and waste may have leaked into the groundwater and migrated into the Oostanaula River. No drinking water wells are thought to be in the area.

F. RECOMMENDATIONS AND JUSTIFICATIONS

The US EPA ERCS contractor HAZTECH removed all waste from the site during the period from 5/16/85 to 5/22/85. For the following reasons, a "low" priority Site Inspection is recommended for this site:

1. the structural integrity of the containment vessel is unknown and leakage of the waste may have occurred.

2. the waste was in place for decades.

3. the waste contained constituents listed as acutely hazardous in 40 CFR 261.33(f) as adopted by the Georgia Rules for Hazardous Waste Management.

4. the waste was located in close proximity to a large population center.

G. REFERENCE TO SUPPORTING DATA SOURCES

1. Map USGS, Rome North (1867) and Rome South (1968) Quadrangles, 1:24,000 scale.

2. Memorandum - May 9, 1985, Subject: E. C. Systems - Rome I Coal Tar Pit.

3. Letter - April 25, 1985, to Mr. Michael Wrobel, E. C. Systems, Inc. Vice President/Properties, P. O. Box 68, 800 Mansell Road, Roswell, GA 30077.

4. Letter - April 29, 1985, Mr. Mike Wrobel, E. C. Systems, Inc., P. O. Box 68, Roswell, GA 30077. Regarding analysis of sludge from Rome, GA Project HC&7 Project No. 623-05.

5. Remedial Action Fact Sheet, May 15, 1985 Rome I/Coal Tar Pit/John Davenport Drive.

CPE/mcw046

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
GA	D981002983

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Rome Coal Tar Pit	North of the intersection of Broad Street and 2nd Ave. behind Battey Building.

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Rome	GA	30161	Floyd	115	7

09 COORDINATES LATITUDE	LONGITUDE
34° 15' 12.5"	085° 10' 23.5"

10 DIRECTIONS TO SITE (Starting from nearest public road) In downtown Rome at the intersection of Broad Street and 2nd Avenue, turn north onto 2nd Avenue and the site is behind the first building on the right hand side of the street.

III. RESPONSIBLE PARTIES

01 OWNER (if known)	02 STREET (Business, mailing, residential)
Roman I Limited/E. C. Systems	800 Mansell Road, P.O. Box 68

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Roswell	GA	30075	(404) 993-4500

07 OPERATOR (if known and different from owner)	08 STREET (Business, mailing, residential)
E. C. Systems	P. O. Box 68, 800 Mansell Road

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
Roswell	GA	30077	(404) 993-4500

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 04/15/85 (MONTH DAY YEAR)
☐ NO

BY (Check all that apply)
☐ A. EPA ☐ B. EPA CONTRACTOR ☒ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)
☐ A. ACTIVE ☒ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
_____ BEGINNING YEAR | _____ ENDING YEAR ☒ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Coal tar was the suspected substance present - dark black in color, in a solid state, possibly buried for 80 years or more.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Coal tar is combustible, toxic by inhalation and a known carcinogen. Contains constituents listed in 40 CFR Section 261.33(f).

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Mike Wrobel	E. C. Systems	(404) 993-4500

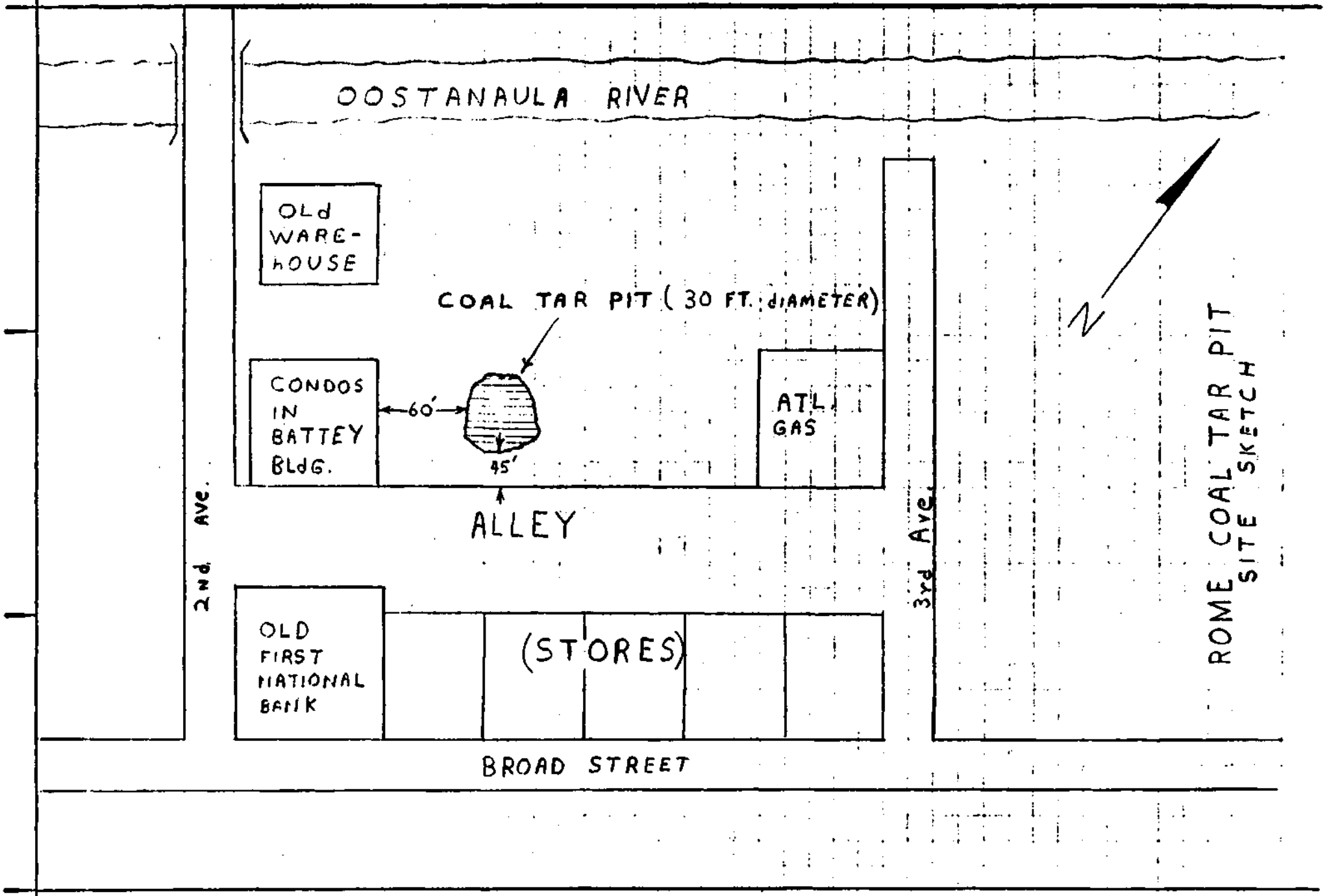
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Charles P. Evans CPE	DNR	EPD-RAU	404 656-7404	05/29/85 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

J. Surowiec

ROME NORTH, GA.
N3415 — W8507.5/7.5
1967
AMS 3952 I SW—SERIES V845
GEORGIA
QUADRANGLE LOCATION
N
Pumping Sta
Radio Tower
Gravel Pit
Athletic Field
ROME
Hospital
Police Sta
Gaging Sta
SITE
Coosa Country Club
Clock Tower
Myrtle Hill Cemetery
Golf Course
Shadyside Cem
McCall Hospital
Jr High Sch
East Rome High Sch
Radio Tower (WROM)
St Marys Sch
Fire Sta
North Rome Sch
Coosa Valley Fairground
Sewage Disposal
Darlington Sch
Athletic Field
Coosa Valley Tech Sch
DeSoto Park Ch
Hollywood Ch
Antioch Ch
New Zion Ch
Gravel Pit
ROME SOUTH, GA.
N3407.5—W8507.5/7.5
1968
AMS 3952 II NW—SERIES V845
COOSA RIVER
ETOWAH RIVER
SOUTHERN
Creek

ROME COAL TAR PIT SITE



PRELIMINARY ASSESSMENT COVER SHEET
ROME COAL TAR PIT
GAD981002983

A. HISTORY OF SITE

A large quantity of coal tar was discovered in an in-ground tank at 102 West Second Avenue in Rome, GA during the construction of the Rivers Place Shopping Center. Historical information indicates the area was used by Rome Gas Works which went out of business 80-90 years ago. Rome Gas Works transferred ownership of the property to Atlanta Gas Light Company which later sold the property to Battey Machine Company. Ownership then transferred to the Roman 1 Investment Company, the investment company now building the Rivers Place Shopping Center. E. C. Systems, Inc., 300 Mansell Road, Roswell, GA 30077, manages the property for Roman 1.

Rome Gas Works is believed to have generated the waste. Due to the proximity of the site to heavily populated areas and the Oostanaula River, an emergency clean-up by the US EPA was requested by the GA EPD for the subject site. Clean up operations began on May 16, 1985 and were completed by May 22, 1985. Removal of all waste was accomplished.

B. NATURE OF HAZARRDOUS MATERIALS

The waste resembles a K087 waste physically and chemically. Its constituents include 1,700 mg/kg of phenols and a toluene extract containing:

Compound	% of Extract
a. naphthalene	40
b. fluoranthene	06
c. chrysene	15
d. acenapthylene	02
e. aliphatic/other	balance

$V = \frac{\pi 30^2}{4} \times \frac{13}{27} = 340$ cu yds not 236

Coal tar sludge is toxic by inhalation and is a known carcinogen. The waste was contained in a metal container 30 feet in diameter and 13 feet deep (236 cubic yards). The container was lined with bricks (3-4 thick) on the inside and outside. The integrity of this container is unknown.

C. DESCRIPTION OF HAZARDOUS CONDITIONS, INCIDENTS, PERMIT VIOLATIONS

The waste material is located in the center of the downtown business district of Rome, GA and is volitile and ignitable. The waste is located 75-100 yards from the Oostanaula River.

D. ROUTES FOR CONTAMINATION

Components of the waste have significant vapor phases and may migrate from the site via an airborne pathway. The structural integrity of the containment vessel is unknown and leakage from the tank may have occurred.

Reference No. 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

ACTION MEMORANDUM

SUBJECT: Immediate Removal Request for the Rome Coal Tar Site, Rome, Georgia - Action Memorandum

FROM: Sue Fields,
On-Scene Coordinator George Shein, for

TO: Jack E. Ravan
Regional Administrator, Region IV

PURPOSE

A. This request is for authorization to proceed with an immediate removal of $100,000 at the Rome Coal Tar Site in Rome, GA. A significant threat to public health and the environment exists at this time and may worsen if response is delayed at this site.

BACKGROUND

A. Incident or Site Setting/Description:

1. Physical location - The site is located at 102 West Second Avenue in downtown Rome, Floyd County, Georgia.

2. General character of site - The site involves a concrete pit which holds waste from a facility which used the carbonization process to produce coal gas for the city of Rome 1890 to 1930. The pit was unearthed during a renovation project, and approximately one half of the material was mixed with soil and dumped outside of Rome off John Davenport Road. Construction debris was thrown on top of the sludge remaining in the pit.

3. Waste Management - Both the waste pit and the pile of excavated material off John Danvenport Road have been covered with soil to temporarily mitigate the air pollution problems the unearthed waste has caused.

4. Surrounding Areas - The waste pit is in downtown Rome, approximately 250 feet from the Oostanaula River and less than 100 feet from a retail shop/apartment complex which is scheduled to open in early June.

   The pile of excavated material is located along John Davenport Road, approximately 200 feet from Little Dry Creek and 100 feet from the roadway.

B. Quantity and Types of Substances Present:

The sludge material is approximately 50% polynuclear aromatic hydrocarbons (PNA's). The sludge is also contaminated with 1,700 ppm phenols. The volume in the pit is estimated at 160 cubic yards. The pile contains approximately 140 cubic yards of waste.

C. Is the site on the NPL? If so, when is later remedial action expected?

No.

THREAT

A. Threat of Exposure to Public or the Environment:

The waste pit downtown threatens a release to the Oostanaula River, and the pile outside Rome threatens the Little Dry Creek. Both locations present a threat to the public health due to inhalation and possible dermal exposure.

B. Evidence of Extent of Release:

The site was initially brought to our attention by Rome's fire chief who had received numerous complaints about odors emanating from the pit. Air pollution is still a problem at both locations.

C. Previous Actions to Abate Threat:

The pit and pile have been covered with soil as a temporary measure to reduce odors.

D. Current Actions to Abate Threat:

None.

Reference No. 3

REMEDIAL ACTION
FACT SHEET

DATE: **May 8, 1985**

SITE NAME: **Rome I/Coal Tar Pit/John Davenport Drive**

PERSON COMPLETING FORM: **Claude W. Goodley**
Environmental Specialist
Remedial Action Unit

PARTIES ASSOCIATED WITH THE REMEDIAL ACTION: **Joseph T. Surowiec**
Unit Coordinator
Remedial Action Unit

1. Names of Responsible Party/Owner:
Rome I/E. C. Systems, Inc.
Mike Wrobel, Project Manager

2. Federal (EPA) and State (EPD) Officials:

EPD Contact:	**Claude W. Goodley** **Joseph T. Surowiec**	Phone #: **(404)656-7404**
EPA Contact:	**Sue Fields**	Phone #: **(404)881-2216**

3. Names of Contractors:
N/A at present

4. Names of Transporters:
N/A at present

5. Name(s) of Disposal Site(s):
N/A at present

WASTES INFORMATION

1. List of Waste(s) including names and types:
Suspected K087 waste.
Coal tar sludge with the following constituents identified through laboratory analysis at Harmon Engineering, Auburn, Alabama.

1. **Phenols.....1,700 ppm**
2. **toluene extract**
   a. **naphthalene.....40%**
   b. **fluoranthene.....06%**
   c. **chrysene.....15%**
   d. **acenapthylene.....02%**

2. Estimate(s) of Waste Amount(s):
   Estimated amount of waste at both locations in total is 100 cubic yards - 200 cubic yards.

3. Toxicity Information (as available):
   Information from the Condensed Chemical Dictionary, Tenth Edition indicates that the Coal Tar sludge is toxic by inhalation and a known carcinogen.

4. Characteristics (physical description including physical properties under ambient conditions) and Former Usage:
   This coal tar at the Rome I site is a semi-solid with a naphthalene-like odor.

5. Anticipated Environmental Pathways of Migration:
   If there is a release to the environment it is suspected through the groundwater.

6. Proposed Clean-up Methods and Associated Clean-up Limits (as known):
   Undetermined at present.

SCHEDULE OF PROPOSED ACTIVITIES

1. Start Date: **Unknown**
2. Ending Date: **Unknown**
3. Days and Hours of Operation: **Unknown**

4. Long-term Follow-up Activities: **N/A**

   a.) Description - (if necessary)

   b.) Tentative dates of activities - (List: Action & Date):

REASON FOR REMEDIAL ACTION(S):

Remedial Action(s) indicated resulting from:

Check One:

__ Regulatory Violation - Involuntary
__ Voluntary
__ Emergency Cleanup
__ Superfund

Comments/Description:

SITE LOCATION AND ENVIRONMENTAL SETTING

1. City: **Rome, Georgia**
2. County: **Floyd**
3. Address: **SW of the intersection of Broad Street and 2nd Avenue.**

4. Environmental Setting: (ie: physical or natural factors affecting contaminant migration):
   This area is ± 100 yards from the Oostanuala River. The site acutally sits on approximately 8-15 feet of fill material used to raise the streets of Rome, Georgia above the flood plain.

5. Demographic Setting: (ie: rural, urban etc.)
   The site is located in an urban/commercial setting. The site is one street over from Broad Street, a major street in Rome, Georgia.

INDICATED SAFETY RESTRICTIONS OR PRECAUTIONS

1. Environmental Monitoring During Cleanup

   a.) Air - **Air monitoring is required due to any toxic gas released from the pit.**

   b.) Water - **Ground water monitoring is required to determine if any of the hazardous wastes have leached into the water.**

   c.) Land - **Minimize any contaminated soil loss.**

   Narrative (briefly described monitoring procedures indicating what type, how, why, etc.)

2. Monitoring Location(s): (describe where monitoring will occur and relationship to site)

Monitoring locations have not been designated as of yet.

3. Public Safety Official(s):
(name and agency)
Chief of Police, Joe Cleveland, (404)291-0977
Fire Chief, Raymond Smith, (404)291-4221, (Emergency 291-4222)
In Rome, Georgia.

4. Waste Handling Activities:

How will materials be handled (removed & packaged):

N/A

Describe transportation route(s):

N/A

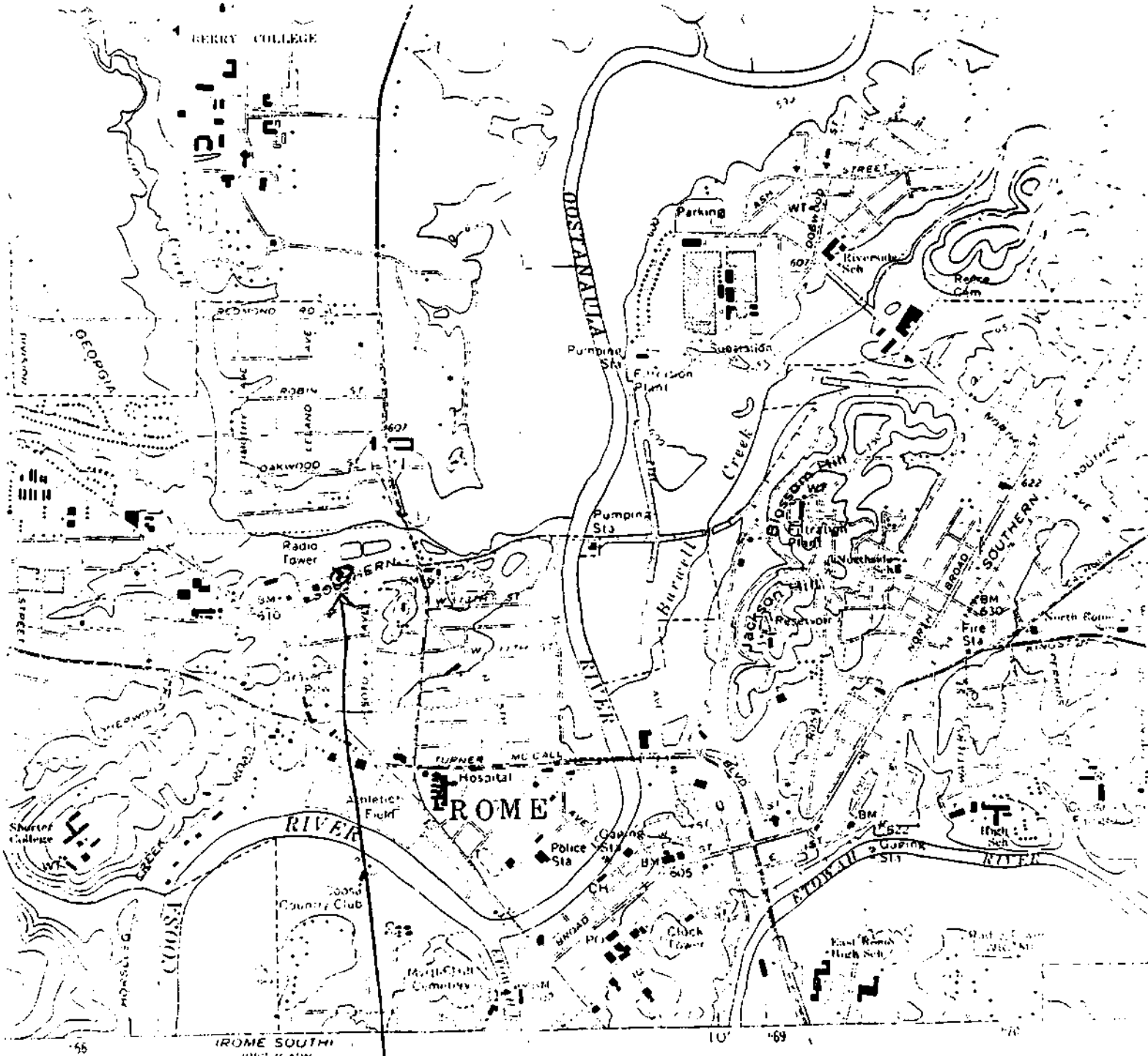
Describe decontamination precautions:

N/A

5. Site Restrictions:
Delineate area to be restricted during activities relating how delineation can be identified and/or enforced.

N/A

COMMENTS:



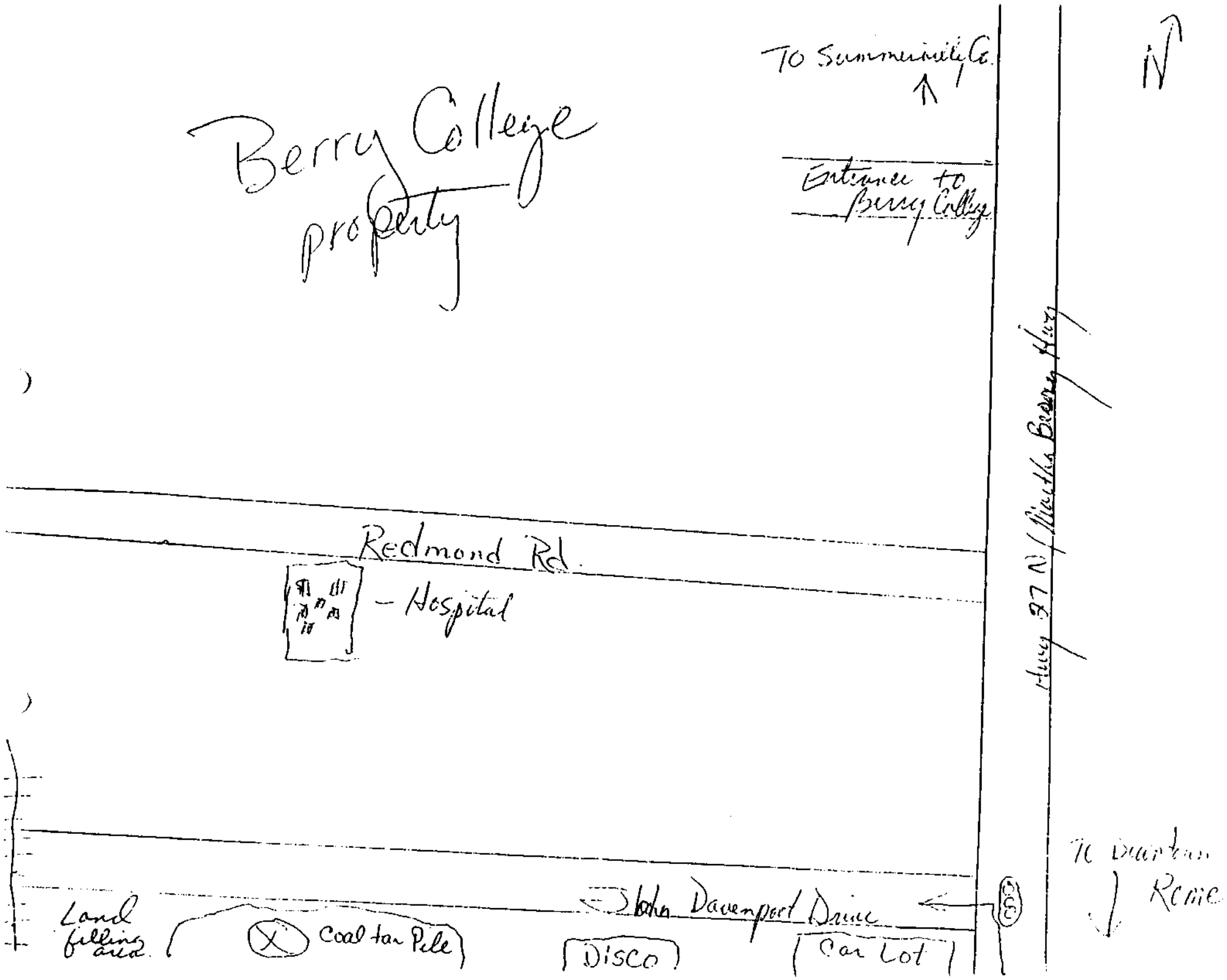
Roman I / John Davenport Dr.
Site

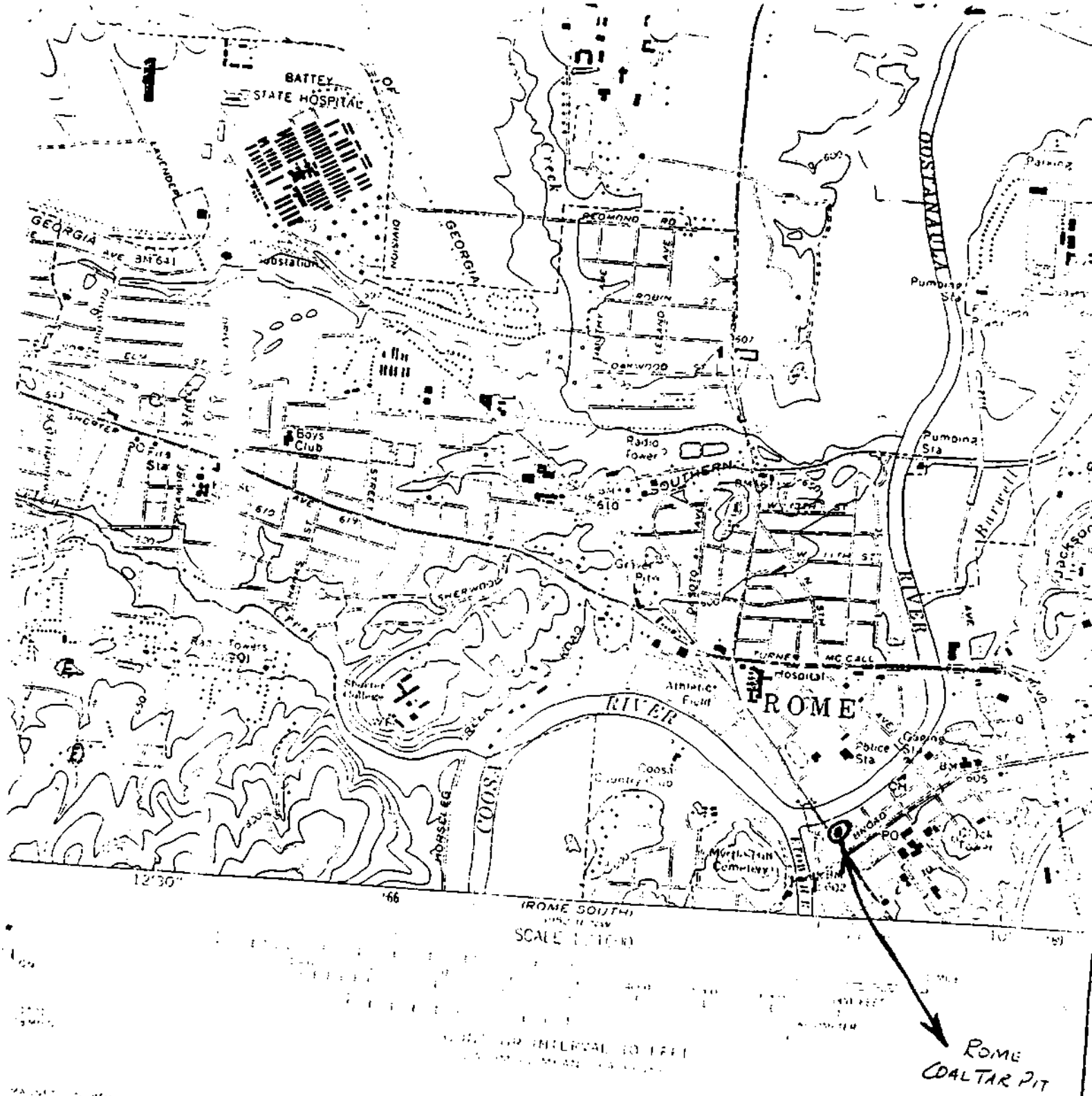
ROME NORTH, GA

OR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D.C. 20242
ER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

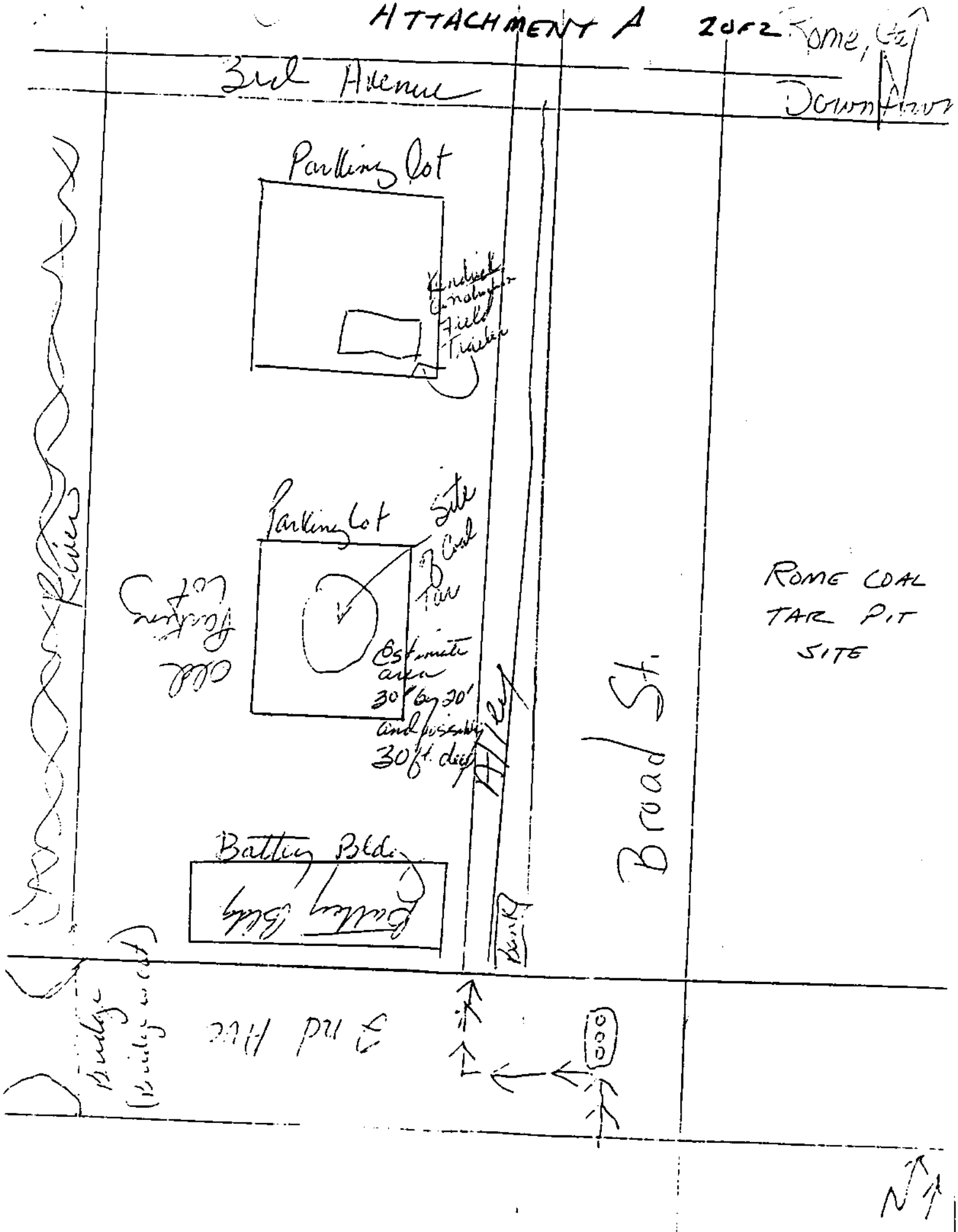
85°11'02.0" Long.

34°16'05.0" Lat.


To Summerville Ga.
N
Berry College property
Entrance to Berry College
Hwy 27 N / Martha Berry Hwy
Redmond Rd.
- Hospital
To Durham Rome
John Davenport Drive
Land filling area
Coal tar Pile
Disco
Car Lot


BATTEY STATE HOSPITAL
GEORGIA AVE
GEORGIA
Substation
REDMOND RD
ROBIN ST
OAKWOOD ST
Creek
OOSTANAULA
RIVER
Pumping Sta
Boys Club
Radio Tower
SOUTHERN
Gravel Pits
SHERWOOD
Radio Towers
Shorter College
Athletic Field
TURNER MC CALL
Hospital
ROME
Police Sta
Coosa Country Club
Myrtle Hill Cemetery
COOSA
RIVER
HORSELEG
12'30"
(ROME SOUTH)
SCALE 1:10000
ROME COALTAR PIT
34°15'12.5"
85°15'23.5"
FOR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D.C. 20242
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST
ROME NORTH, GA
N

ATTACHMENT A 2 of 2 Rome, GA



Reference No. 4

Rome Coal Tar Site, Rome, GA
Hamill-Hooker Rd Dumps #2, #3
Chattanooga, TN

Blackwood Creek diesel spill, Calhoun, GA

Mike Higgs
Tennesse Dept. of Health and Environment
Division of Solid Waste Management
4th Floor Customs House
701 Broadway
Nashville, TN 37219-5403

GAEPD
656 7802
2836
232 6374 - Claude Bradley

090005

1400 Arrive @ E.C. Systems Site in Rome, GA. Claude Goodley has been here yesterday, and inform them that the state ~~that~~ SE analysis would take ~ 6 weeks.

Peg calls Mr. Jim Robbins of E.C. systems ~~to~~ inform him that we are here. Robbins and a Mr. Bob Ogeltree are attorneys representing E.C. Systems.
Mr Robbins takes us out to where the material was dumped off John Davenport Rd. (Out Martha Berry Rd). The pile of material has been covered to dirt and is ~ 15 feet X 50 feet, and ~ 12 feet high. ~~Apparently~~ It appears that additional asphaltine material has been graded over the area behind the pile. It may be the asphalt from the old park lot the contractors were removing.

Stopped back @ the site, Peg Sizemore tells me that HazTech, CWM and Weston have all been to the site as potential contractors for the clean up. She says the CWM people took a sample back w/ them.

J.C. Sizemore, the foreman, tells me that the asphalt material we saw behind the pile

terial that has been
sures me that none
was graded through

he needs a few days
nited partners in E.C. Systems
to do. Also, he'd like to
with the GA EPD or the Federal
Bob Kaplan of EPA's Regional
gal liabilities clarified

a.

ic. Freda Griffis (TAT)
stody of the sample from
#3 and deliver it to
morning.

4-17-85

Spoke with Claude Goodley of GA EPD concerning the Rome, GA E.C. Systems Site. He says they'll send legal notice to E.C. Systems to have the site cleaned up, but they are in no hurry because it is not a threatening situation

Spoke with Mike Higgs of TN DHE. He gave me site owners as Tax assessor's office

Dump #3: Parcel 167E-A-014
85.5 acre tract
John Hartford Boyle
Box 87 Rt One
Allen, TX 75002

Deed Book 2000 pg 266

Boyle listed as trustee covering a 3/5 interest of property - it appears that the property was left to 5 grandchildren, 3 of which are his.

Tennessee Products Company
Lookout Oil & Refining Co
1/11/46 Southern Chemical Cotton
} have easements to property

Mike Wrobel, Vice President - Property E.C. Systems, Inc.
P.O. Box 68
Roswell, GA 30077 993-4500

Battey Machinery Co.
2960 Calhoun Rd, NE
Rome, GA 30161
E.L. Yeargan, Jr President
404 291 4141
Jack Cummins - Pres(?)

4-17

Inform
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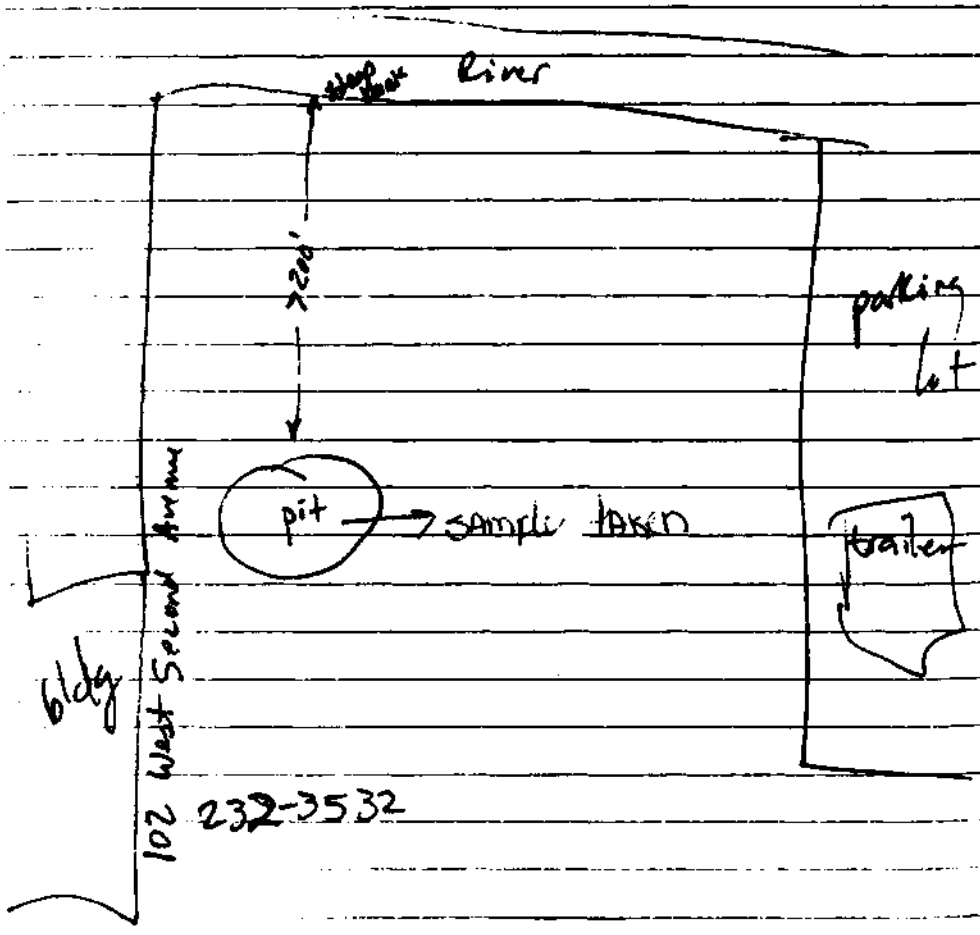
ROUGH DIAGRAM



4-24-85

9:00 AM Field (Bu
Rome, GA.

9:30 AM Surveying
@ West 2
tar pit
from the

Burton set
to 0.

Burton surve
and gets re
7 ppm.

J.C. Sizemore
pit has a con
is ~ 14 feet
the diameter
The brick wal
is 24".

10:20 Arrive at Dav
Burton surve
All readings
The pile is
Davenport Rd

4-25-85

1300 Met with Joe Surowiec & Claude Goodley of OAEPD, and Mike Wrobel and his attorney, James Robbins for E.C. Systems. Mr. Wrobel told us that at the Rome Coal Tar Site, the pit was discovered ~ 2/3 full. Estimated depth is 20'. ~ 1/2 of the mat'l was solidified with soil, etc and transported to the John Davenport Rd. dump. Several brick pillars were dumped into the pit in an attempt to solidify it for filling.

Robbins asks what their options are. Surowiec tells him that the Davenport Site can be handled under RCRA and gives him Jennifer Tadak's name.
He then tells them that they need to show no release of hazardous mat'ls if they want to leave the pit there, and that continuous monitoring would be required.
Robbins asks for a letter this afternoon telling them their options, etc.
Surowiec asks for 1 hr to develop it.

I inform Surowiec that the John Davenport Site does not appear to require emergency action, but the waste is not secure and proper management of the material needs to begin soon. He insures me that their RCRA people will get right on it.

Joe assures me that they will keep me posted on any new developments @ the site and get me copies of their correspondence with the RP's.

5-2-85

Claude Goodley of EPD calls and tells me he is expecting a letter from Wrobel tomorrow. From an earlier phone conversation, Goodley says Wrobel would like to return all excavated material to the pit, cover it over and pave it, and perform no monitoring. Goodley will get me a copy of the letter ASAP.

5-6-85

9:00 AM Claude Goodley calls and says that Surowiec and John Taylor met and discussed this matter. They feel that no hazardous waste laws have been violated unless there existed GW contamination. They would like to send a letter to Wroble telling him he could put the material dumped at John Davenport Rd back in the pit and cover it as long as they cover it with an impermeable barrier. The state would ask that they monitor the GW downgradient of the pit. If they refuse to, the state would just put this on their list of sites to keep an eye on. Goodley asks what I think about this, and I tell him I'll check w/ our RCRA folks and get back to him.

Date: 5/16/85
Weather: Hot and Fair
Anticipated Contractors Performance:
Bring in 2 loads of pozzalime to be mixed with material that will be excavated from the pit. ~~Mix~~ Excavate and mix material w/ track-hoe and front-end loader. 2 loads of contaminated material will be taken to Chemical Waste Landfill in Emelle, AL.

0800 S. Fields, L. Burton, & T. Bergquist o/s.

0830 T. Bergquist leaves to get heavy equipment.
C. Goodly (GA EPD) arrives o/s.

0845 2 Robbie Woods trucks arrives o/s with pozzalime.

0900 Trackhoe / loader arrives o/s.
Hazteen Crew:
R. Manager - T. Bergquist
2 Tech - W. Thompson, L. Malcom*
2 heavy equipment operators - J. Corman, D. Thorton*
Site is taped off w/ hazardous tape.

0945 Trackhoe starts excavating clean fill dirt (4'-5' feet) out of tar pit to get to contaminated material.

Reference No. 5

ROME COAL TAR SITE
ROME, GEORGIA

TDD# 04-8505-05

MAY 1985

TABLE OF CONTENTS

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SECTION 2	PHOTOGRAPHS & DIAGRAMS
SECTION 3	SAMPLING INFORMATION
SECTION 4	ACTION MEMO/SUPPORTING DOCUMENTS
SECTION 5	POLREPS
SECTION 6	EPA FACT SHEET
SECTION 7	COST SUMMARY
SECTION 8	PERSONNEL LOG

SECTION 1
OSC REPORT

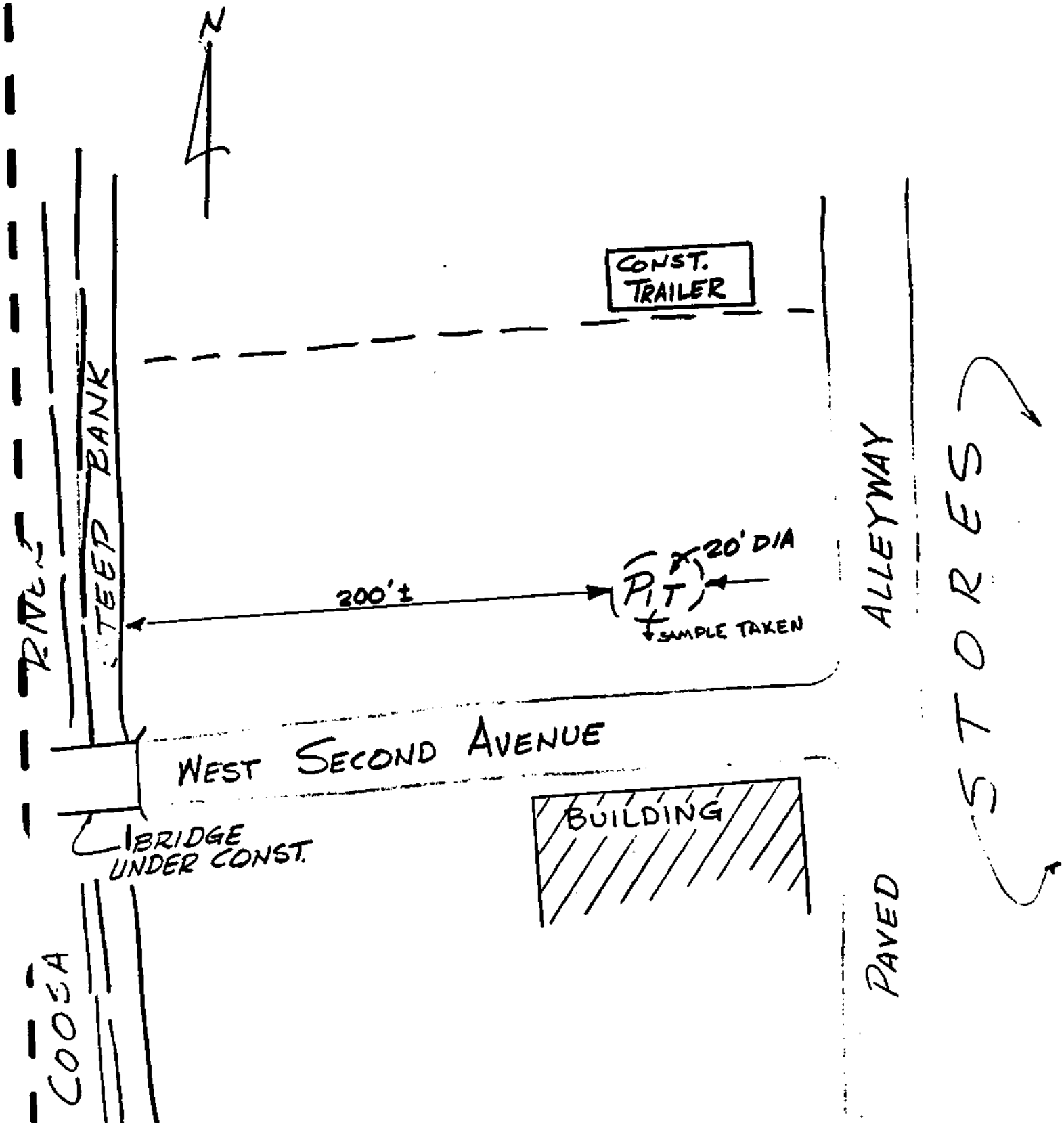
OSC REPORT
ROME COAL TAR SITE
ROME, GEORGIA
MAY 16 - MAY 19, 1985

SUE FIELDS
ON-SCENE COORDINATOR

ROME COAL TAR SITE

The Rome Coal Tar Site is located at 102 West Second Avenue in downtown Rome, Georgia in Floyd County. The site was owned by several gas and utility companies from 1903 to 1942. Reportedly, coal gas was produced at the site using the carbonization process through the 1930's. Coal tar wastes from this process were left in a brick cylinder onsite. The cylinder was subsequently buried when the level of the city was raised 8 to 15 feet along the Oostanaula River. The cylinder is located approximately 250 feet from the Oostanaula River.

The property was purchased by a development firm in 1984 who planned to renovate two buildings onsite. The cylinder is located in what will be a parking area. During construction, the cylinder was unearthed, and approximately one half of the waste was mixed with clay and dumped outside of Rome off John Davenport Road. Construction debris was thrown into the waste remaining in the pit. The evening of the day the pit was uncovered, Rome's fire chief received numerous complaints about the odor. The fire department located the source of the odor and notified EPA on April 12, 1985. EPA personnel investigated the site later that day, and suggested covering the waste to mitigate the air pollution problem. After negotiations with the landowner failed, the Georgia Environmental Protection Division (EPD) asked EPA for Superfund assistance at the site. An Administrative Order was issued to the landowner, who declined to take any action. An immediate removal commenced onsite on May 16, 1985. Twelve tractor trailer loads of material were excavated from the cylinder. Due to a recent 2 inch rain at the site, accumulated rainwater in the cylinder had to be solidified with pozzalime. During excavation, no infiltration of groundwater was observed. To facilitate excavation of material from the 13 feet deep, 28 feet diameter cylinder, areas adjacent to it were excavated to lower the excavator. Black, odoriferous cinder-like material was discovered outside the walls of the cylinder. The construction contractor for the renovation project informed us that they had encountered this material throughout the whole lot from 8 feet to 12 feet deep. Due to logistics problems with the excavator, a small amount of material could not be excavated from the bottom of the cylinder. This amount is approximately 10 tons maximum. Several tons of pozzalime were placed in the bottom of the cylinder to help stabilize the remaining waste. The cylinder has a brick bottom which appears to be in tact. Eighteen loads of material were retrieved for disposal from the dumpsite off John Davenport Road. The project was completed on May 19 at an extramural cost of $93,000.



COAL TAR PIT SITE AREA
ROME, GEORGIA
MAY, 1991

4. Surrounding Areas - The waste pit is in downtown Rome, approximately 250 feet from the Oostanaula River and less than 100 feet from a retail shop/apartment complex which is scheduled to open in early June.

   The pile of excavated material is located along John Davenport Road, approximately 200 feet from Little Dry Creek and 100 feet from the roadway.

B. Quantity and Types of Substances Present:

The sludge material is approximately 50% polynuclear aromatic hydrocarbons (PNA's). The sludge is also contaminated with 1,700 ppm phenols. The volume in the pit is estimated at 160 cubic yards. The pile contains approximately 140 cubic yards of waste.

C. Is the site on the NPL? If so, when is later remedial action expected?

No.

THREAT

A. Threat of Exposure to Public or the Environment:

The waste pit downtown threatens a release to the Oostanaula River, and the pile outside Rome threatens the Little Dry Creek. Both locations present a threat to the public health due to inhalation and possible dermal exposure.

B. Evidence of Extent of Release:

The site was initially brought to our attention by Rome's fire chief who had received numerous complaints about odors emanating from the pit. Air pollution is still a problem at both locations.

C. Previous Actions to Abate Threat:

The pit and pile have been covered with soil as a temporary measure to reduce odors.

D. Current Actions to Abate Threat:

None.

Attachment # 1

Enforcement Sensitive:

An Administrative Order was issued to the current property owner, E. C. Systems, Inc. of Roswell, Ga on May 14, 1985. The respondent refused to comply with the order and notified EPA of their intent on May 14, 1985.

ACTION MEMORANDUM

DATE: MAY 23 1985

SUBJECT: Immediate Removal Funding Increase Request for an Immediate Removal Action at the Rome Coal Tar Site in Rome, GA.

FROM: Sue Fields
On-Scene Coordinator

TO: Jack E. Ravan
Regional Administrator

ISSUE

This request is for additional funding in the amount of $10,000 for the immediate removal action at the Rome Coal Tar Site in Rome, GA.

DISCUSSION

On May 14, 1985, funding was authorized for an immediate removal action at the Rome Coal Tar Site in Rome, GA in the amount of $100,000 which included $10,000 for intramural cost.

Onsite activities were completed at the site on 5/19. However, it is anticipated that the await bills for transporation and disposal of the material will exceed the current project ceiling of $90,000. This will occur because some of the waste was mixed with clay (before EPA involvement) which caused the waste to be much denser that anticipated. Therefore, the tonnage of waste which was transported for disposal was higher than estimated originally.

For this reason, I am requesting that the ceiling for expenditures for the immediate removal project be increased to $110,000, which includes $10,000 for intramural costs to mitigate the threat posed to public health and the environment posed by the Rome Coal Tar Site in Rome, GA.

Approve: /s/ John A. Little
Deputy Regional Administrator Date: MAY 23 1985

Disapprove: _____ Date: _____

POLREP #1

DATE: May 23, 1985

SUBJECT: POLREP #1 - Rome Coal Tar Site, Rome, GA.

FROM: Sue Fields/OSC Region IV

TO: Tim Fields/ERD

Situation:

After the landowner declined to reply to an Administrative Order issued by by EPA, immediate removal activities were initiated at the Rome Coal Tar site. A total of 659.5 tons of coal tar waste and contaminated soil were excavated and transported to the CWM facility in Emelle, AL for disposal. The removal ran from 5/16 to 5/19. Due to a denser than expected waste, it is anticipated that transportation and disposal costs will exceed the current extramural ceiling of $90,000 for P.O. #6859-04-064. Therefore, a request for ceiling increase has been submitted to raise, the total ceiling to $110,000 of which $100,000 are for extramural costs.

Reference No. 6

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET S W
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER

May 9, 1985

Mr. Jack E. Ravan
Regional Administrator
EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Jack:

Members of my staff have recently investigated, jointly with EPA Region IV personnel, a site in Floyd County named the Rome I Coal Tar Pit. Analysis of the waste discovered buried there indicates a similarity to K087 waste as defined in Section 261.32 of the Federal RCRA regulations and the Georgia Rules for Hazardous Waste Management. Additionally, a portion of this waste was excavated by the local contractor on site and removed to another location identified as the John Davenport Drive site.

Given the fact that this waste is chemically and physically similar to K087 and since it contains significant amounts of the constituents for which K087 waste is listed in the regulations (naphthalene and phenol) we feel that the waste is hazardous. Since both site locations pose a potential threat to heavily populated areas and the Oostanaula River, we are requesting that EPA consider the use of "Superfund" resources to remove the waste from both locations and transport the material to a secure landfill.

My staff will continue its investigation into the history of the site and work with the responsible parties to complete a remedial site assessment and investigation into prior releases into soils and groundwater.

Please advise me if you need additional information or assistance.

Sincerely,

Harold F. Reheis

for J. Leonard Ledbetter
Commissioner

JLL:js:w036

United States Environmental Protection Agency

Region 4
Office of Public Affairs
345 Courtland Street, NE
Atlanta, GA 30365

Alabama
Florida
Georgia
Kentucky

Mississippi
North Carolina
South Carolina
Tennessee

EPA Environmental News

(404) 881-3004

May 16, 1985

Lucy Justus, Georgia EPD
404/656-6905

Charlis Thompson, EPA
404/881-3004

FOR IMMEDIATE RELEASE

At the request of the Georgia Environmental Protection Division (EPD), the U.S. Environmental Protection Agency (EPA) will begin a cleanup of hazardous wastes on Thursday, May 16 at a coal tar pit in Rome, GA.

The site, located at 102 West Second Avenue, consists of a pit containing waste from a facility involved in producing coal gas for the City of Rome from 1890 to 1930. The pit was unearthed during a renovation project, and approximately one-half of the material was mixed with soil and dumped outside of Rome off John Davenport Road. Construction debris was thrown on top of the sludge remaining in the pit.

Both the waste pit on West Second Avenue and the pile of excavated material off John Davenport Road are contaminated with coal tar derivatives and phenol. Coal tar is a known carcinogen and is toxic by inhalation. Phenol, an irritant to tissue, is toxic by ingestion, inhalation and skin absorption.

The cleanup will involve the removal and transportation of the sludge and contaminated soil to an approved disposal facility.

-more-

Reference No. 7

HARMON ENGINEERING & TESTING
SCIENTISTS • ENGINEERS • CONSTRUCTORS
AUBURN INDUSTRIAL PARK AUBURN, ALA. 36830-4399
205 821-9250

April 29, 1985

Mr. Mike Robel
EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Re: Analysis of Sludge from Rome, Georgia Project
HE&T Project No. 623-05

Dear Mr. Robel:

In accordance with the verbal instructions of Jim Kendrick, Harmon Engineering & Testing (HE&T) has completed the analysis of a sludge sample collected by Mr. Kendrick from the "tar pit" unearthed in Rome, Georgia. The data sheet is attached.

Testing was performed according to the State of Georgia Hazardous Waste Management Regulations given at 391-3-11.07. These tests showed that the hazardous waste characteristics of EP Toxicity, ignitability, reactivity and corrosivity were all negative.

Additional testing was done to determine if the waste contained any of the so-called "Appendix VIII" compounds. The sample was extracted in a soxhlet apparatus using toluene; this extraction was diluted and analyzed by gas chromatography mass spectroscopy (GCMS). The results indicated that the principal components of the sample were polynuclear aromatic hydrocarbons and aliphatic hydrocarbons. These results indicate that EPD can classify the waste as hazardous.

We are continuing to discuss this situation with soils engineering firm and can, if you desire, provide complete turnkey studies to meet the EPD requirements. If you have any questions, please feel free to call on us.

Sincerely,

HARMON ENGINEERING & TESTING

Mark Shearon
Vice President
Environmental Division

MS:vn

Enclosure

HARMON ENGINEERING & TESTING

AUBURN INDUSTRIAL PARK, AUBURN, AL 36830-4399 (205) 821-9250

LABORATORY RESULTS

EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Attention: Mike Robel

HE&T PROJECT 623-05

DATE SAMPLE RECEIVED 4-19-85

DATE DATA TRANSMITTED 4-29-85

CLIENT JOB REFERENCE Sludge from Rome, Georgia

E.P. TOXICITY METALS

HE&T Sample Number	Client Sample Identification	As mg/L	Ba mg/L	Cd mg/L	Cr mg/L	Hg mg/L	Pb mg/L	Se mg/L	Ag mg/L
1587	Tar Sludge	0.02	<0.5	<0.02	0.06	<0.001	<0.02	<0.005	<0.02

		Corr. (pH) S.U.	Reactivity +or-	Ignitability °C	Phenols mg/kg	Total Cyanides mg/kg	Sulfides mg/kg	PCB mg/kg
1587	Tar Sludge	7	Neg.	>60	1678	5.9	<10	<10

Organic Analysis of Toluene Extract

		Component	Percentage Estimated of Extract
1587	Tar Sludge	Napthalene	40
		Fluoranthene	6
		Chrysene	15
		Acenapthylene	2
		Aliphatic/Other Hydrocarbons	Balance

Approved for Transmittal

Terence A. Whitt/MS

Laboratory Manager

Reference No. 8

INFORMATION CIRCULAR 39

GEOLOGY AND GROUND-WATER RESOURCES OF FLOYD AND POLK COUNTIES, GEORGIA

Charles W. Cressler

THE GEOLOGICAL SURVEY OF GEORGIA
DEPARTMENT OF MINES, MINING AND GEOLOGY

1970

Reprinted 1988 by the Geologic Survey Branch
of the Environmental Protection Division of the
Georgia Department of Natural Resources

he collected during a study made for a Masters thesis.

Mr. Horace Sheffield and many other students from Shorter College in Rome, and Dr. Lewis Lipps, Professor of Geology at Shorter, collected and cataloged numerous fossils from Polk County. Mr. Allen Sheldon and Dr. Lipps were instrumental in bringing to the writer's attention the excellently preserved Middle Cambrian trilobites obtained from the banks of the Coosa River. Mr. Cyrus Pope was generous enough with his time to spend a day guiding the writer to dozens of iron mines in the rugged terrain around Indian Mountain.

Dr. William B. N. Berry of the University of California, Berkeley, identified the graptolites collected from Polk and Murray Counties, Ga.

Plates of fossils for the report were prepared by the Paleontology and Stratigraphy Branch of the U. S. Geological Survey under the direction of Dr. Ellis L. Yochelson.

This investigation was started under the direct supervision of H. B. Counts, former district engineer, Ground Water Branch, and completed under A. N. Cameron, district chief, Water Resources Division, Georgia District, U. S. Geological Survey.

Mr. Harry E. Blanchard, Hydraulic Engineering Technician, made the complete well inventory of Polk and Floyd Counties and collected water samples for chemical analyses.

GEOLOGIC FORMATIONS AND THEIR WATER-BEARING PROPERTIES

Floyd and Polk Counties are underlain by more than 20 geologic formations that have an aggregate thickness of several thousand feet; they range in age from Early Cambrian to Pennsylvanian. Originally the formations were horizontal, but compressional and tensional forces later warped them and broke them into a series of faulted folds. Erosion of the folded and faulted formations produced the varied outcrop pattern that exists today.

In order to appraise the ground-water resources of an area, it is necessary to know the lithology, thickness, and topographic setting of the geologic formations there. This information for Floyd and Polk Counties is summarized in table 1 and is discussed in more detail in the text that follows. The generalized availability of ground water in the counties is shown in figures 2 and 3. The detailed outcroppings of the formations and structural cross sections are given on the accompanying geologic maps, figures 4 and 5.

Cambrian System

Shady Dolomite

Along the trace of the Coosa fault between Rome and Cave Spring, the Rome Formation is underlain by a unit of dolomite that tentatively is being correlated with the Shady Dolomite of Early Cambrian age. The Shady, named by Keith (1903, p. 5) for Shady Valley, Johnson County, Tenn., normally occupies a position below the Rome, separating it from the Weisner Quartzite. As the dolomite in Floyd County occupies the same stratigraphic position and is of a similar character, it is being correlated with the Shady.

Lithology and thickness.—In Floyd County, on the north bank of Big Cedar Creek about 300 feet east of the bridge on Spout Springs Road (fig. 4), the exposed Shady consists of a lower 20-foot unit and an upper 10 to 15-foot unit of thinly to massively bedded, commonly shaly dolomite, separated by about 10 feet of dark shale and very thin bedded earthy dolomite that weathers to shale. The upper dolomite layer is succeeded by 5 feet of dark-gray shale that passes abruptly upward into maroon shale and siltstone of the Rome Formation.

The dolomite is mainly medium to dark gray, very thickly to massively bedded and fine grained. Much of it contains large amounts of silt and clay that either weathers out as shale or accumulates on the surface as an olive-gray, tan, or yellowish-brown crust. Where the dolomite is deeply leached, the impurities form a tan shale residuum. The residuum is well displayed in the first road cut southeast of the creek bridge.

In natural exposures the Shady is dotted by rounded to irregularly shaped pieces of highly fractured light-gray quartz that protrude from its surface, an occurrence not observed on any other formation. Much of the dolomite is crisscrossed by numerous fractures filled by light-gray quartz. Some outcrops are so highly fractured that about half of the rock consists of quartz fracture fillings. One outstanding feature of the Shady is the complete absence of bedded or nodular chert.

The presence of the Shady Dolomite in Polk County has not been established firmly, but two outcrops there have lithologies that are similar to the Shady in Floyd County and therefore are correlated with it. One outcrop, which is about 2 miles south-southeast of Van Wert, is a 30 to 50-foot section of dolomite faulted between the Rockmart Slate and the Cartersville Fault. The dolomite is medium to dark gray, massively bedded, finely crystalline, and somewhat earthy. Some weathered layers have small pieces of light-gray quartz protruding from their surfaces, similar to those on the Shady in Floyd County, but the rock is almost entirely free of chert. Fractures, widely spaced in most of the outcrop but locally abundant, are filled with white quartz. In nearly all respects, this dolomite closely resembles the dolomite of the Shady along Big Cedar Creek in Floyd County.

Dolomite that underlies the valley 1.5 miles southwest of Van Wert was identified as Shady. It is medium to light gray, thickly to massively bedded and finely crystalline and may be as much as 100 feet thick. Although the dolomite is generally chert free, it is earthy and produces a residuum of siltstone or very fine grained quartzite, plus other siliceous material that resembles jasperoid.

Distribution.—A few feet of the Shady is exposed on Park Drive, north of the Floyd County Public Works Camp. A thin section of the formation crops out between the Rome Formation and the plane of the Coosa fault, in a large cleared area on the west side of the ridge about a mile north of Park Drive. The best exposures of the Shady and the ones showing the contact with the Rome Formation occur on the north bank of Big Cedar Creek, east of the bridge on Spout Springs Road, and in the first road cut southeast of that bridge.

The Shady in Polk County crops out beneath the Cartersville fault about 2 miles south-southeast of Van Wert, and in the valley 1.5 miles southwest of Van Wert.

Stratigraphic relations.—As the contact between the Shady and the Rome Formation is gradational, the contact was placed at the base of the lowest bed of maroon shale in the Rome. The dark-gray shale overlying the dolomite of the Shady was included as part of the Shady because similar shale occurs lower in that formation, whereas nothing like it occurs in the Rome. The contact is well displayed on the north bank of Big Cedar Creek and along the road southeast of the creek bridge.

Hydrology.—The Shady seems to have little potential as an aquifer along most of its outcrop in Floyd County because it underlies steep slopes. Domestic supplies may be obtainable in the few places where the formation is dissected, such as the low area near Park Drive south of Rome. Larger yields may be available where the Shady is crossed by Big Cedar Creek, but the area in which to place a well is small and by having to drill close to the Creek, there is a likelihood of pumping surface water.

The Shady in Polk County is an aquifer only in the valley 1.5 miles southwest of Van Wert where it underlies a broad low area that has recharge available from a stream. Wells there probably will supply from 5 to 50 gpm or more. Well 5FF15, which is 186 feet deep and cased to 80 feet, supplies a home and farm. The well water is hard, but otherwise is of good quality.

A pool spring on the valley floor has a small discharge that is used as a domestic and farm supply.

Rome Formation

The Rome Formation of Early Cambrian age was named by Hayes (1891, p. 143) for exposures south of Rome, Ga. No type section was specified, but Hayes probably named the formation for exposures on the ridge that now is crossed by Park Drive and Walker Mountain Road. The massive quartzites in the upper part of the formation are particularly well displayed on Walker Mountain Road.

Lithology and thickness.—The Rome consists of between 500 and 1,000 feet of interbedded shale, siltstone, sandstone, and quartzite, in that order of abundance. Most of the shale and much of the thin-bedded sandstone and siltstone are brightly colored in hues of red, purple, green, yellow and brown. Alternating layers of varicolored rock produce a striking effect that is unique in the area. Most of the thick layers of sandstone and quartzite are very light gray, but upon exposure alter to tan or rusty brown. Thickly layered sandstone and quartzite occur mainly in the upper half and

are most abundant near the top of the formation.

A good exposure of the Rome and one that shows the rarely exposed base of the formation can be seen along the bank of Big Cedar Creek, east of the bridge on Spout Springs Road. The lower 50 feet of the Rome consists of red or maroon shale and thin-bedded reddish siltstone. This is followed by 100 or more feet of red and tan siltstone and a little maroon shale containing very fine-grained sandstone in beds 3 to 6 inches thick. The middle part of the Rome is made up chiefly of thin-bedded, generally fine- to medium-grained white, yellow, tan, purple, and pale red sandstone intercalated with similarly colored siltstone and red, purple, green, tan, or yellow shale. The upper one-third of the formation is composed of shale and siltstone almost the same as that lower down, but it is interbedded with sandstone and quartzite that increases in abundance and becomes thicker bedded toward the top. Layers 2 to 4 feet thick are common and a few beds exceed 6 feet in thickness. Where fresh, the sandstone and quartzite are light gray, but upon exposure they change to light brown.

The quartzite in the upper part of the Rome varies somewhat in character with the locality. In the City of Rome, at the intersection of Glenn Milner Boulevard and East 6th Avenue, the quartzite is very fine grained, massive, though thinly bedded, and has a banded weathering surface caused by the alternation of light to medium-gray, and tan-weathering layers. The quartzite forming the low ridge between the tracks of the Southern Railway and the Central of Georgia Railway, between the Lindale and Old Lindale Highways just south of Rome, is very fine grained, laminated, and crossbedded. It is composed principally of rounded quartz grains and contains some detrital feldspar grains (Laurence, 1961, p. 39).

The thickly to massively bedded very fine-grained quartzite and maroon shale that forms the small ridge above the Shady Dolomite in the valley 1.5 miles southwest of Van Wert, Polk County, tentatively is identified as Rome on the basis of its lithology and the assumption that the underlying rock is correctly identified as Shady.

Northeastward from Rome, the formation becomes progressively less sandy; sandstone beds are fewer, thinner, and finer grained. The upper one-fourth of the formation, in contrast to the section south of Rome, is almost devoid of sandstone. Much of the upper shale lacks the characteristic bright colors, making it difficult to determine accurately the top of the formation. Several layers of material in this part of the outcrop appear to have been derived from carbonate.

Distribution.—The Rome is fairly resistant to erosion and makes up a series of knobby ridges of moderate relief that reach diagonally across Floyd County. From the Alabama State line near Cave Spring, the ridges extend northeastward through Rome and Shannon. Almost all exposures of the Rome are faulted on the west or northwest side, so that only the upper half to three-quarters of the formation crops out. The entire section of the Rome appears at the surface only along segments of the Coosa Fault between Rome and Cave Spring, where the Shady Dolomite replaces the Rome Formation as the base of the Coosa thrust sheet.

The formation is well displayed at several places within the city limits of Rome, especially east of the Civic Center and near the Fair Grounds. The Rome was uncovered south of East Rome Elementary School during construction of the south extension of Turner McCall Boulevard. Massively bedded quartzite typical of the upper part of the Rome is exposed beside Glenn Milner Boulevard at East 6th Avenue. Dolomite that may belong to the Rome, but which may be part of the Shady, crops out just north of Glenn Milner Boulevard at East 4th Avenue.

So far as is known, outcrops of the Rome in Polk County are limited to the faulted ridges about 2 miles west of Georgia Highway 101 at the Floyd County line and to the low ridge along the south side of the valley, 1.5 miles southwest of Van Wert.

Stratigraphic relations.—On Walker Mountain Road, the highest sandstone bed in the Rome Formation is overlain by several feet of varicolored shale and siltstone of the typical Rome type. Thus, the uppermost sandstone layer is not a satisfactory indication of the top of the formation as was suggested by Hayes (1902).

The highest colored shale and siltstone of the Rome are followed by several feet of yellow and tan, rather nondescript shale, and very thinly bedded siltstone that grade upward into greenish and

tan-weathering shale of the Conasauga Formation. Every place where the contact between the Rome and the Conasauga was observed, it appeared to be gradational, the transition taking place through an ill-defined zone about 10 feet thick.

Hydrology.—Ground water in the Rome occurs mainly in secondary openings produced by fracturing and jointing and, thus, is available primarily from the thicker layers of siltstone, sandstone, and quartzite. Yields from the Rome generally are smaller than from other sandstone aquifers in the area, because the large amount of shale in the formation impedes the downward movement of water, reducing the rate of recharge.

Wells inventoried in the Rome Formation range in depth from about 80 to 140 feet and average about 100 feet deep. In the upper part of the formation where sandstone and quartzite layers are better developed, wells generally yield between 5 and 10 gpm, and some reportedly will furnish 20 gpm. Lower in the section where shale is the predominant rock type, yields are generally around 1 or 2 gpm.

The well water reportedly varies from soft to hard, though most of it is soft and some contains a high concentration of iron. Water sampled from well 5JJ21 had a total hardness of 53 ppm (parts per million) and an iron content of 0.07 ppm (table 2).

Conasauga Formation

The Conasauga Formation of Middle and Late Cambrian age was named by Hayes (1891, p. 143, 144-145) for exposures along the Conasauga River in Whitfield and Murray Counties, Ga.

In the area of this report, the Conasauga occupies two belts in which the formation differs significantly; the belts are several miles apart and occupy different depositional environments. The western belt includes all outcrops of the formation in Floyd County northwest of the Coosa Fault. The other, the eastern belt, takes in all of the Conasauga in Floyd County southeast of the Coosa fault, as well as all of the outcrops in Polk County. Because of their lithologic differences, the two belts are discussed separately.

Eastern belt

The Conasauga forming the eastern belt extends diagonally across Floyd County from the Gordon County line past Rome to the Alabama State line. Branches off the main belt occur in southeast Floyd County and in Polk County.

Lithology, thickness, and distribution.—In the part of the eastern belt lying between Rome and the Gordon County line, the Conasauga consists of limestone and shale in nearly equal proportions. The lower part of the formation is made up of 100 feet or more of medium-gray, massively bedded limestone. A good outcrop of the limestone occurs beside the road about 1.5 miles north of the center of Shannon. The limestone is followed by several hundred feet of olive and tan shale, which is used extensively for the manufacture of brick at Plainville just across the line in Gordon County.

The middle of the formation includes thick, apparently discontinuous layers of massively bedded, medium-gray, oolitic and nonoolitic limestone that grades into and is interbedded with olive and tan shale.

Southwest of Rome, toward Cave Spring, the proportion of carbonate increases so that shale is important only in the lower part of the formation. As can be seen along Big Cedar Creek, the lower part is mainly olive shale that becomes interbedded with and finally is replaced by coarse oolitic, medium gray and dark gray, thickly to massively bedded limestone farther up. The middle and upper parts of the formation are chiefly medium- to dark-gray, massively bedded limestone with only a small amount of yellow and tan-weathering shale scattered throughout or derived from the decomposed limestone. Near the top, the limestone gives way to light- to dark-gray, fine-grained, locally oolitic dolomite. The dolomite is distinctively different from that in the overlying Knox Group, as it has a smooth, rounded weathered surface and lacks the crisscross depressions that typify the weathered rock in the lower part of the Knox. Moreover, it is entirely lacking in bedded or nodular chert. The dolomite is exposed in the cut of U. S. Highway 411, about 1 mile northeast of the bridge over Big Cedar Creek.

Southwest of Cave Spring, carbonate rocks constitute an even greater part of the Conasauga. Limestone apparently dominates the middle part, and dolomite makes up most of the upper third of the formation. Dolomite crops out at several places

along U. S. Highway 411 near the Alabama State line. On fresh exposures the dolomite appears to be fairly pure, but upon weathering it leaves a residue of siliceous oolite and a few layers of fine-grained sandstone.

The upper part of the Conasauga consists of several hundred feet of calcareous olive-gray and tan shale interbedded with thick sections of massively bedded, blue-gray ribboned limestone and some gray dolomite. One shale unit is thick and makes up a prominent ridge that runs subparallel to Georgia Highway 53 near the Gordon County line. Ribboned limestone is well displayed near spring 5JJS51 southwest of Hermitage. The proportion of limestone increases upward until it completely replaces the shale at the top of the formation. The uppermost 200 to 300 feet of limestone and dolomite are equivalent to the Maynardville Limestone of Tennessee, as shown by fossils at the U. S. National Museum. The total thickness of the Conasauga northeast of Rome is about 1,500 feet.

From U. S. Highway 411, the Conasauga extends southward for a distance of about 2 miles into Polk County. Although it is not exposed, the soil and topography indicate that the formation there is chiefly limestone and dolomite.

In southeastern Floyd County, exposures are so limited that the makeup of the Conasauga could not accurately be determined. However, the amount of shale present in the reddish carbonate soil indicates that the lithology probably is similar to that in the area northeast of Rome.

Hydrology.—In the eastern belt, from the Gordon County line to a short way south of Paris Lake, including the outcrops in southeast Floyd County and the one in north-central Polk County, most wells yield between 2 and 25 gpm. The average depth of the wells is about 120 feet, but some are deeper than 300 feet. It may be possible to obtain far higher yields from wells drilled in limestone, as one well in the formation south of Calhoun in Gordon County produced nearly 300 gpm.

The range in well yields largely reflects the different lithologies in the formation. Nearly all of the low yielding wells are in shale, whereas the better producing ones are partly or wholly in limestone. To some extent in the shale, but more so in the limestone, the amount of water obtained depends largely on the topographic position of the well site; wells positioned near the bottom of local drainage courses normally are the best producers. Even poorly defined drainage courses that flow only during wet periods are good drilling sites, as they tend to concentrate the flow of ground water and increase the quantity available to a well.

The quality of the well water varies from soft to hard, depending on the type of rock from which it is derived. The water generally has a low iron content.

A few springs discharge from this part of the Conasauga but they are small. Spring 5JJS1, about 1.75 miles south of the center of Shannon, flows about 0.58 mgd (million gallons per day) and is used for domestic supply (table 3). Hermitage Spring (5JJS4) has about the same flow. Spring 4HHS3 at Lindale discharges from limestone in the upper part of the formation and is used by an industry. Wells at this site were reported to furnish from 5 to more than 50 gpm; nearly all of the wells supply more than 10 gpm. The wells average about 80 feet deep. The deepest well was 105 feet. Water from this segment of the formation generally is moderately hard to hard.

Along the faulted valley that extends from near Hematite Crossing, Polk County, northward to the Floyd County line, several springs discharging into Little Cedar Creek have a combined flow of 3 to 7 mgd, depending on the time of year. Unfortunately, most of these are seep springs located on the poorly drained valley floor and are subject to flooding. Protecting them from pollution would require extensive improvements. Those few that are situated some distance from the creek offer the best possibility for development.

Western belt

The Conasauga, in the western belt, underlies most of the Coosa Valley southwest of Rome and large areas of Floyd County northeast of Rome. The rocks in the belt can be divided into three fairly distinct units although the contacts between them tend to be gradational and faulting and folding has brought about a mixing of types in some areas. Accurate differentiation of the units along much of their length is difficult or impossible because the ground is covered by thick alluvial and

Table 3.--Spring flows in Floyd and Polk Counties, Ga.

Number	Name or Owner	Geologic source	Date measured or estimated	Flow (mgd)	Remarks
	Floyd County:				
1JJS1	Roy Williamon	Conasauga Formation	11/30/62	0.14 E.	
1JJS3	Unknown	Conasauga Formation	----	.04 E.	
2HHS2	Unknown	Conasauga Formation	----	.05 E.	
2HHS3	Pepperell Mfg. Co.	Conasauga Formation	10/12/50	.2	Used by industry
4HHS4	Pepperell Mfg. Co.	Conasauga Formation	3/09/64	.15 E.	Developed
4HHS5	Pepperell Mfg. Co.	Conasauga Formation	3/09/64	.10 E.	Developed
2JJS2	W. D. Vann	Conasauga Formation	11/09/61	.14+E.	Not used
5JJS1	Unknown	Conasauga Formation	10/26/61	.10 E.	
5JJS4	Hermitage	Conasauga Formation	10/26/61	.14 E.	Supplies 5 homes
5JJS6	Russell Spring	Conasauga Formation	10/12/50	.06	Undeveloped
5JJS7	Dempsey Brothers Dairy	Conasauga Formation	10/25/61	.10 E	Used by milk processing plant
5JJS8	Dempsey Brothers Dairy	Conasauga Formation	10/25/61	.10 E	Used by milk processing plant
5JJS10	J. W. Blankenship Mrs. Fred Dodd Mrs. Oline Parker	Conasauga Formation	10/25/61	.07 E	
3GGS2	Old Mill Spring	Knox Group	5/14/62 11/16/64	5. 4.8	Good industrial supply; would require large enclosure
3GGS4	Cave Spring	Knox Group	10/11/50 5/14/62 11/16/64	2.4 2.6 2.5	Supplies water to Cave Spring and Georgia School for the Deaf
4HHS1	Harry Marion Spring	Knox Group	10/11/50	1.3	Undeveloped
			10/12/62	1.2	
5HHS1	Wax Spring	Knox Group	11/16/64	.9	Seep spring; discharge from several outlets
5HHS2	J. R. Abrams	Knox Group	10/24/62	.14 E.	Supplies water for 5 homes
5HHS3	Luther Johnson & neighbors	Knox Group	10/24/62	.14 E.	Supplies community
5HHS4	Dan H. Norton	Knox Group	10/12/62	.14 E.	Furnishes dairy and 4 homes.
5JJS2	Morrison Camp Ground Spring	Knox Group	10/12/50	1.6	Partially enclosed: supplies Morrison Camp in summer
			11/18/64	.86	
5JJS3	Youngs Mill Spring	Knox Group	11/07/50	2.	Flows into lake: seep spring difficult to protect
			11/12/62	2.3	
5JJS5	Edwards Spring	Knox Group	10/12/50	.7	Undeveloped
			11/12/62	.7	
5JJS11	Harry Dawson	Knox Group	10/26/61	.05 E.	
3JJS1	Sand Spring	Floyd Shale	11/18/64	.3	Undeveloped

Table 6 (cont.)

Well no.	Owner	Type of well	Topography	Geologic symbol of aquifer	Diameter of well (inches)	Depth (feet)	Cased to (feet)	Water-level below land surface	Date measured	Yield (gpm)	Use	Remarks
4HH 37	Joman W. Terry	Drilled	Hillside	Lower OCk	6	137	120	50	1959	7	Domestic	Muddies during heavy rains
38	T. A. Green	Drilled	Hillside	Lower OCk	6	80	70	64	1959	12	Domestic and stock	
39	A. W. Horton	Drilled	Slope	Ccln	6	130	43	38	1962	15	Domestic and stock	
40	Pepperell Mfg. Co.	Drilled	Slope	Cc	6	275	--	--	----	---	Industrial	
41	Pepperell Mfg. Co.	Drilled	Slope	Cc	6	153	--	--	----	---	Industrial	
42	Pepperell Mfg. Co.	Drilled	Slope	Cc	6	126	--	--	----	---	Industrial	
43	Pepperell Mfg. Co.	Drilled	Slope	Cc	6	126	--	--	----	---	Industrial	
44	Pepperell Mfg. Co.	Drilled	Slope	Cc	6	75	--	--	----	---	Industrial	
5HH1	J. T. Traylor	Drilled	Hillside	Lower OCk	6	120	120	55	1960	---	Domestic	
2	K. M. Tate	Drilled	Hillside	Lower OCk	6	143	143	70	1958	40	Domestic and stock	
3	J. A. Ingram	Drilled	Hillside	OCk - lower?	6	41	41	27	1961	---	Domestic	
4	J. M. Ingram	Drilled	Hillside	Lower OCk	6	80	70	20	1957	10	Domestic and stock	
5	R. B. Emerson	Drilled	Slope	Lower OCk	6	108	100	75	1952	11	Domestic and stock	
6	Lewis M. Sullins	Drilled	Slope	Lower OCk	6	104	100	54	1957	20	Domestic	
7	C. W. Kerce	Dug	Slope	Lower OCk	36	60	60	50	1962	---	Domestic and stock	
8	J. E. Abernathy	Drilled	Slope	Lower OCk?	6	312	70	60	1956	20	Domestic and stock	
9	David Vaughn	Drilled	Slope	Lower OCk	6	472	74	100	1952	---	Domestic and stock	
10	Eugene Evans	Drilled	Slope	Lower OCk	6	120	105	--	----	7	Domestic and stock	
11	B. H. Braden	Drilled	Slope	Lower OCk	6	135	--	92	----	12	Domestic and stock	
12	Earl Spain	Drilled	Hillside	Lower OCk	6	75	75	--	----	---	Domestic	
13	Mrs. Lodie Rogers	Drilled	Hillside	Lower OCk	6	130	--	30	1959	---	Domestic and stock	
14	Spring Creek Baptist Church	Drilled	Hillside	Lower OCk	6	90	--	--	----	---	Domestic	
15	J. W. Thrash	Drilled	Hillside	Lower OCk	6	103	90	50	1962	30	Domestic	
16	Mrs. G. F. Rogers	Drilled	Hillside	Lower OCk	6	126	126	--	----	---	Domestic and stock	
17	Tom Carroll	Drilled	Hillside	Lower OCk	6	278	--	70	1962	17	Domestic and stock	
18	John Ellington	Drilled	Hillside	Lower OCk	6	113	110	25	1962	---	Domestic	
19	W. C. Lloyd	Drilled	Hillside	Lower OCk	6	92	85	26	1952	60	Domestic and stock	
20	R. E. Mitchell	Drilled	Hillside	Lower OCk	6	87	85	30	1958	---	Domestic	
21	Grady Cook	Drilled	Hillside	Lower OCk	6	100	--	--	----	20	Domestic	

Table 6 (cont.)

Well no.	Owner	Type of well	Topography	Geologic symbol of aquifer	Diameter of well (inches)	Depth (feet)	Cased to (feet)	Water-level below land surface	Date measured	Yield (gpm)	Use	Remarks
4JJ 9	H. E. Thompson	Drilled	Slope	Mfs	6	60	30	1	1961	---	Domestic	Some iron
10	Albert Smith	Drilled	Slope	Mfs	6	80	18	6	1957	---	Domestic and stock	
11	Earl Yarborough	Drilled	Slope	Do	6	86	30	6	1961	20	Domestic	
12	C. C. Lynch	Drilled	Slope	Mfs	6	60	21	At lsd	1961	---	Domestic	Some iron
13	Earl Yarborough	Drilled	Slope	Mfs	6	89	52	30	1954	10±	Domestic	Some iron
14	J. T. Winslett	Drilled	Slope	Mfs	6	66	--	10	1961	10	Stock	
15	E. O. Woodfin	Drilled	Slope	Ccsl	6	120	76	10	1957	10	Domestic	
16	J. D. Cayle	Drilled	Flat	Ccsl	6	96	21	18	1959	---	None	
17	J. L. Hall	Drilled	Slope	Ccsl	6	80	40	38	1953	20	Domestic	
18	Roy Selman	Drilled	Flat	Ccsl	6	67	28	14	1949	---	Water grass	Some iron
19	C. C. Lynch	Drilled	Flat	Ccsl	6	100	18	18	1961	---	Domestic	
20	Mr. Gresham	Drilled	Slope	Ccsl	6	94	18	10	1946	---	Domestic	
21	C. G. Wall	Drilled	Slope	Cr	6	103	70	18	1957	10	Domestic	QW analyses
22	J. Howard Ford	Drilled	Slope	Cr	6	189.5	101	20	1950	10	Domestic and stock	
23	James H. Ellis, Jr.	Drilled	Hillside	Cr	6	97	92	30	1956	20	Domestic	Some iron
24	Joe Aycock	Drilled	Flat	Mfs	6	50	12	15	1957	10+	Domestic	Some iron
25	Ides Adams	Drilled	Flat	Mfs	6	107	105	82	1944	---	Domestic	
26	Pure Oil Company	Drilled	Flat	Mls	6	86	26	10	1946	12	Domestic	Flows in winter
27	W. W. Purdy	Drilled	Slope	Mfs	6	50	52.5	--	----	---	Domestic	
5JJ1	Jerry Johnson	Drilled	Slope	Lower OCk	6	135	--	55	1961	---	Domestic	
2	Redmond Ransom	Drilled	Slope	Cc	4	150	150	80	1942	---	Domestic	
3	A. L. Paris	Drilled	Slope	Cc	6	164	60	30	1945	6	Domestic	
4	Bill McKellor	Drilled	Slope	Ccl	6	71	26	18	1949	9	Domestic	
5	J. E. Gaines	Drilled	Slope	Cc	6	69	20	15	1948	15	Domestic and stock	
6	William A. Gaines	Drilled	Slope	Cc	6	85	10	4	1949	---	Domestic	
7	Jessie Burch	Drilled	Slope	Cc	6	32	32	--	----	17	Domestic	
8	J. T. Culberson	Drilled	Slope	Cc	6	243	18	15	1958	---	Domestic	
9	J. T. Culberson	Drilled	Flat	Cc	6	50	17	12	1953	---	Domestic	
10	Bill McKellor	Drilled	Flat	Cc	6	100.6	42	18	1961	---	None	

Table 6 (cont.)

Well no.	Owner	Type of well	Topography	Geologic symbol of aquifer	Diameter of well (inches)	Depth (feet)	Cased to (feet)	Water-level below land surface	Date measured	Yield (gpm)	Use	Remarks
5J311	Bill McKellor	Drilled	Flat	Ꞓc	6	70	20	10	1942	---	Domestic	
12	Monroe Caine	Drilled	Slope	Ꞓcsl	6	72	--	12	1961	---	Domestic and stock	
13	William E. Dawes	Drilled	Slope	Ꞓcsl	6	81	19.5	12	1961	10	Domestic and stock	
14	J. R. Dempsey	Drilled	Slope	Lower OꞒk	6	130	120	68	1960	---	Domestic	
15	Glenn Davis	Drilled	Slope	Ꞓcsl	6	83	30	23	1950	---	Domestic	
16	William Otto Dutton	Drilled	Slope	Ꞓcsl or Mfe	6	100.5	--	--	----	---	Domestic	
17	Ben Johnson	Drilled	Flat	Ꞓr	6	140	80	50	1960	---	None	
18	James T. Johnson	Drilled	Slope	Ꞓr	6	80	--	14	1954	---	Domestic	
19	William J. Wosely	Drilled	Hillside	Ꞓr	6	120	42	30	1961	---	Domestic	
20	Floyd County Board of Education	Drilled	Hillside	Lower OꞒk	6	170	170	110	1940	16	School	
21	Hubert H. Vaughan	Drilled	Hillside	Ꞓc or Ꞓr	6	122	100	40	1961	---	Yard	
22	N. V. Crowder	Drilled	Flat	Ꞓc	6	200	12	12	1959	10	Stock	Water muddies
23	J. L. Bishop	Drilled	Hillside	Lower OꞒk	6	209	106	167	1959	5+	Domestic	Water muddies
24	C. A. Teague	Drilled	Slope	Lower OꞒk	6	225	--	125	1941	---	Domestic	
25	B. R. Grogan	Drilled	Hillside	Lower OꞒk	6	478	110	98	1961	25	Domestic and stock	
26	J. T. Stower	Drilled	Hillside	Lower OꞒk	6	150	142	90	1955	10	Domestic	
27	Henry Sherman	Drilled	Hillside	Lower OꞒk	6	160	160	75	1958	15	Domestic	
28	Southeastern Pipeline Company	Drilled	Flat	Ꞓc or OꞒk	4	363	360	10	1961	32	None	Water muddies
29	C. C. Davis & Bro.	Drilled	Slope	Ꞓc	6	100	8	13	1961	20	Domestic and stock	
30	C. C. Davis & Bro.	Drilled	Slope	Ꞓc	6	70	12	26	1957	---	Domestic and stock	
31	Burt Dempsey, Jr. & Brother	Drilled	Slope	Ꞓc	6	159	16	20	1961	17	Domestic	
32	Russell Cochran	Drilled	Flat	Ꞓc	6	66	--	40	1957	---	Domestic	
33	F. A. Webb	Drilled	Slope	Ꞓc	6	64	58	6	1960	10	Domestic	
34	J. M. Lumpkin	Drilled	Slope	Lower OꞒk	6	148	148	110	1960	---	Domestic and stock	
35	Floyd Carner	Drilled	Slope	Lower OꞒk	6	136.5	126	40	1950	9+	Domestic	
36	Will Waters	Drilled	Slope	Ꞓc	6	130	112	70	1957	---	Domestic	
37	J. W. Sherman	Drilled	Slope	Lower OꞒk	6	135	135	--	----	10	Domestic and stock	
38	Willis Bros., Inc.	Drilled	Slope	Ꞓcsl	6	50	30	8	----	20	Domestic and stock	

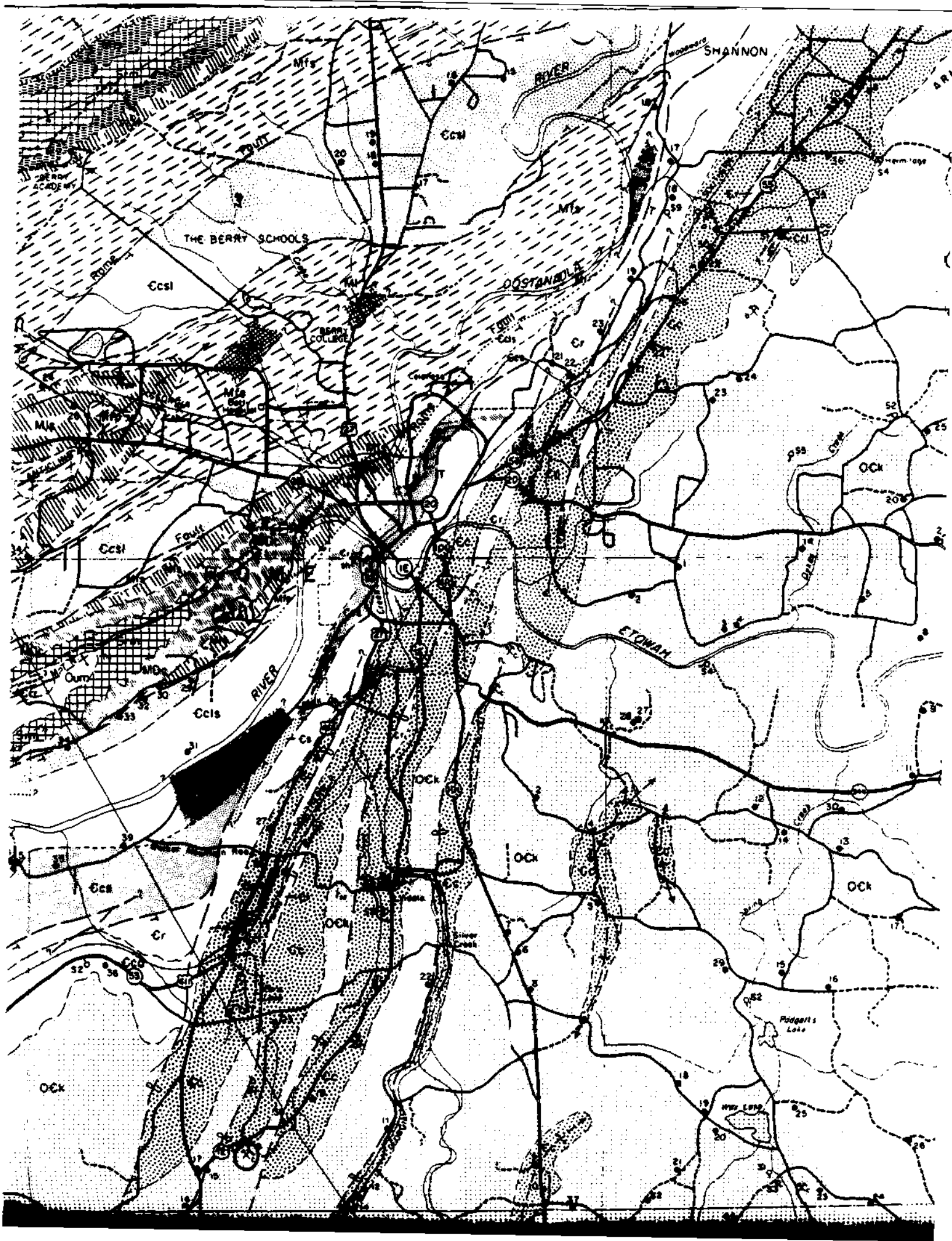

SHANNON
RIVER
THE BERRY SCHOOLS
BERRY ACADEMY
BERRY COLLEGE
OOSTANAULA
Fault
Rome
ETOWAH
RIVER
Silver Creek
Podgett's Lake
Mfs
Ccsl
Ccls
Cr
Cc
OCk
Oum

Table 2. Aquifer and well characteristics in Georgia

[Ft = feet; gal/min = gallons per minute. Sources: Reports of the U.S. Geological Survey and Georgia Geologic Survey]

Aquifer name and description	Well characteristics			Remarks
	Depth (ft)	Yield (gal/min)		
	Common range	Common range	May exceed	
Floridan aquifer system: Limestone, dolomite, and calcareous sand. Generally confined.	40 - 900	1,000 - 5,000	11,000	Supplies 50 percent of ground water in State. Major users include the Savannah, the Brunswick, the Jesup, the St. Marys, the Albany, and the Dougherty Plain areas. Water-level declines at Savannah and Brunswick. Intrusion of brackish water from deeper zones at Brunswick. In some areas, water has natural radioactivity that exceeds State and national drinking-water regulations. Formerly called principal artesian aquifer.
Claiborne aquifer: Sand and sandy limestone. Generally confined.	20 - 450	150 - 600	1,500	Major source of water in southwestern Georgia. Supplies industrial and municipal users at Dougherty, Crisp and Dooly Counties and provides irrigation water north of Dougherty Plain. Called Tertiary sands aquifer in South Carolina and Tennessee. Part of Tertiary sedimentary aquifer system in Alabama.
Clayton aquifer: Limestone and sand. Generally confined.	40 - 800	250 - 600	2,150	Major source of water in southwestern Georgia. Supplies industrial and municipal users at Albany and provides irrigation water northwest of Albany. Water-level declines exceed 100 ft at Albany. Iron concentrations in Randolph County exceed national drinking-water regulations. Part of Tertiary sedimentary aquifer system in Alabama.
Cretaceous aquifer system: Sand and gravel. Generally confined.	30 - 750	50 - 1,200	3,300	Major source of water in east-central Georgia. Supplies water for kaolin mining and processing. Includes Providence aquifer in southwestern Georgia. Water-level declines greater than 50 ft at kaolin mining centers and 100 ft near Albany. Iron concentrations exceed national drinking-water regulations in some areas. Called Black Creek and Middendorf aquifers in South Carolina.
Paleozoic aquifers: Sandstone, limestone, and dolomite; storage is in regolith and fractures and solution openings in rock. Generally unconfined.	15 - 2,100	1 - 50	3,500	Not laterally extensive. Limestone and dolomite aquifers most productive. Springs in limestone and dolostone aquifers discharge at rates of as much as 5,000 gal/min. Sinkholes can form in areas of intensive pumping. Water is generally of good quality, although contamination from septic tanks and farm waste reported in some areas. Laterally equivalent to Paleozoic carbonate aquifers in Alabama and Pennsylvanian sandstone aquifers in Alabama and Tennessee.
Crystalline rock aquifers: Granite, gneiss, schist, and quartzite; storage is in fractures in rock and in regolith. Generally unconfined.	40 - 600	1 - 25	500	Not laterally extensive. Water of good quality with exception of large concentrations of iron and manganese in some areas and contamination from septic tank effluent in densely populated areas.

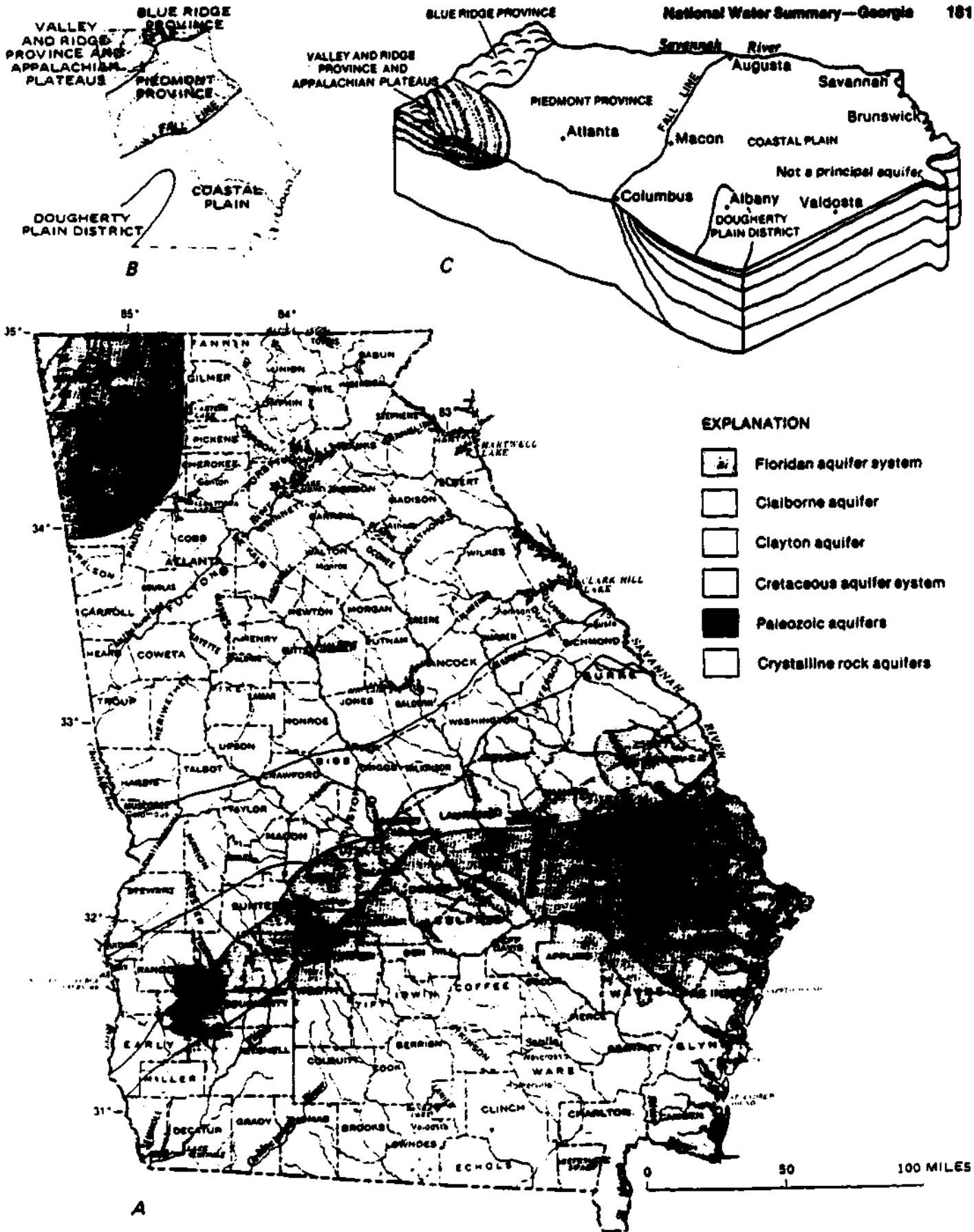
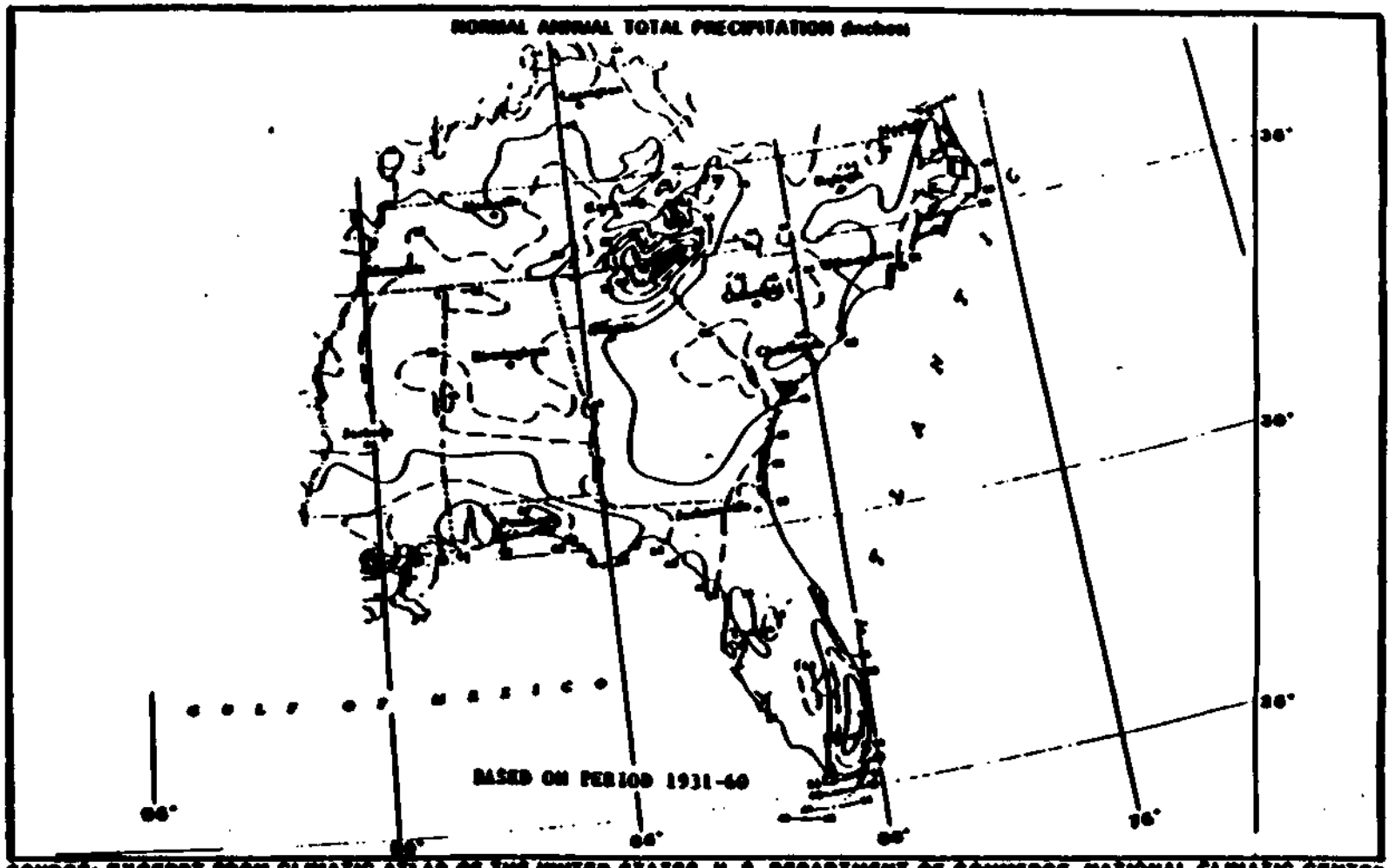


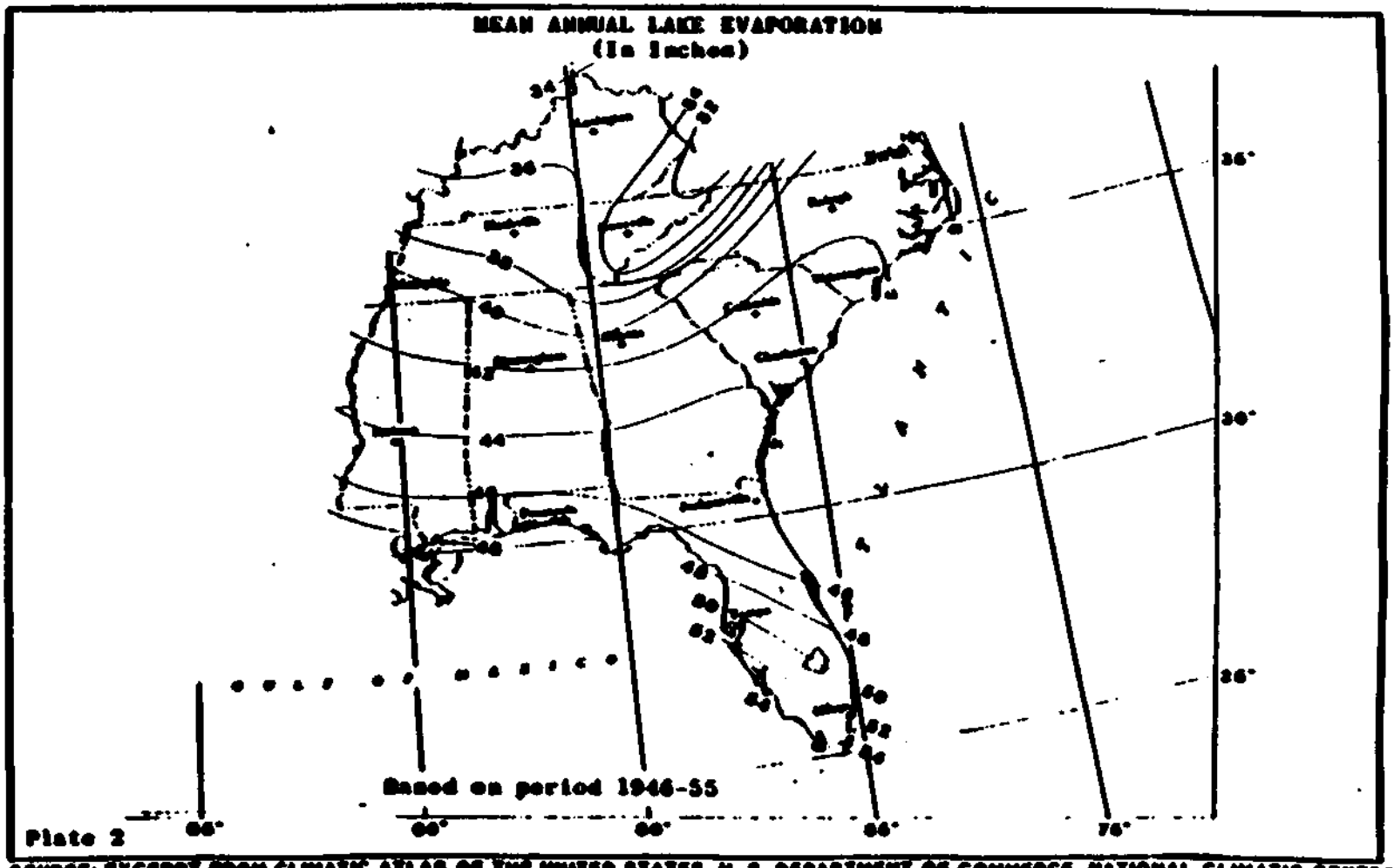
Figure 1. Principal aquifers in Georgia. *A*, Geographic distribution. *B*, Physiographic diagram and divisions. *C*, Block diagram showing principal aquifers and physiographic divisions. (See table 2 for a more detailed description of the aquifers. Sources: *A*, J. S. Clarke, U.S. Geological Survey, written commun., 1984. *B*, Fenneman, 1938; Raisz, 1954. *C*, Modified from Pierce and others, 1984.)



SOURCE: EXCERPT FROM CLIMATIC ATLAS OF THE UNITED STATES, U. S. DEPARTMENT OF COMMERCE, NATIONAL CLIMATIC CENTER, ASHEVILLE, NORTH CAROLINA, 1979.

FIGURE 5

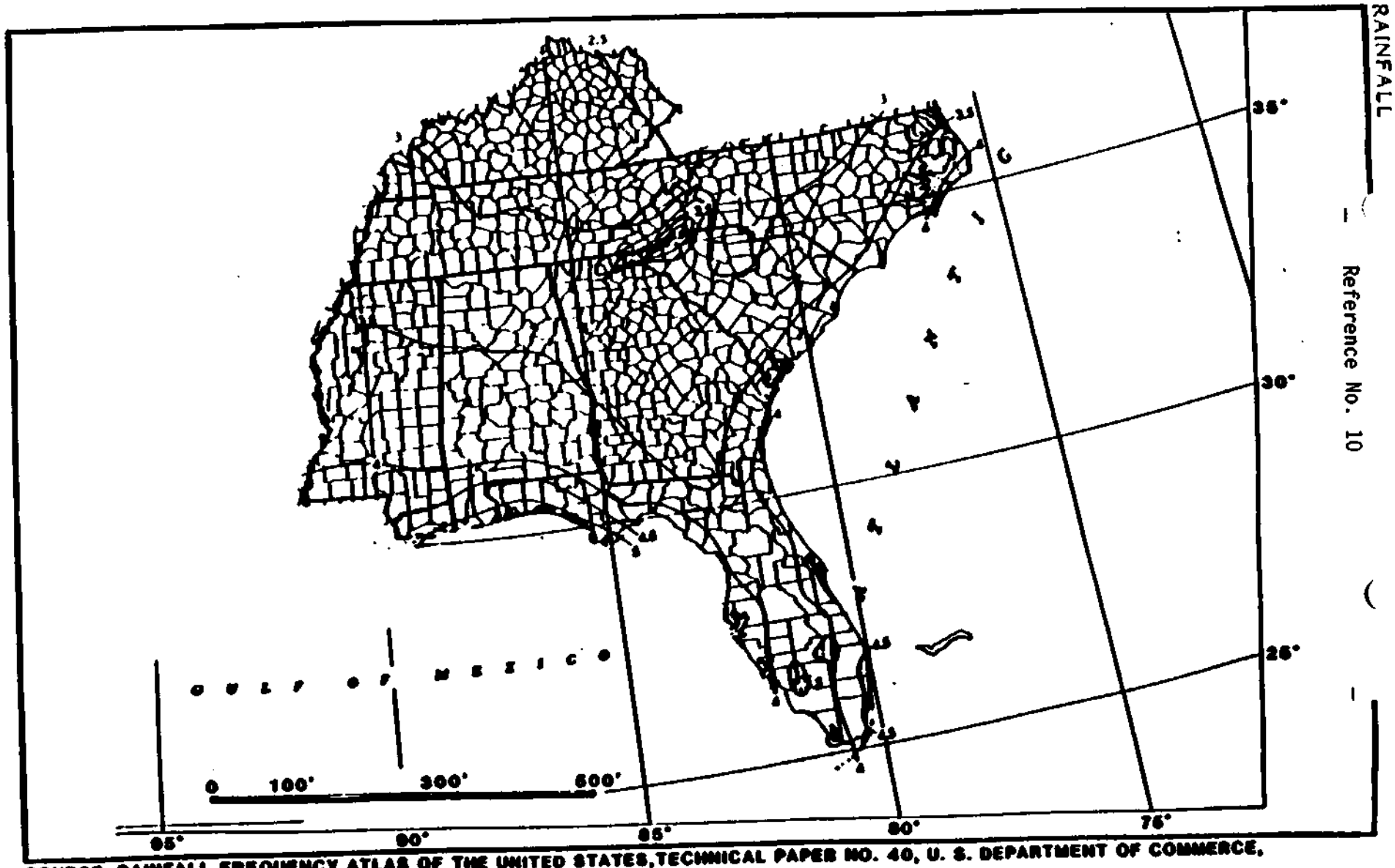
NORMAL ANNUAL TOTAL PRECIPITATION (INCHES)



SOURCE: EXCERPT FROM CLIMATIC ATLAS OF THE UNITED STATES, U. S. DEPARTMENT OF COMMERCE, NATIONAL CLIMATIC CENTER, ASHVILLE, NORTH CAROLINA, 1970.

FIGURE 4

MEAN ANNUAL LAKE EVAPORATION (IN INCHES)

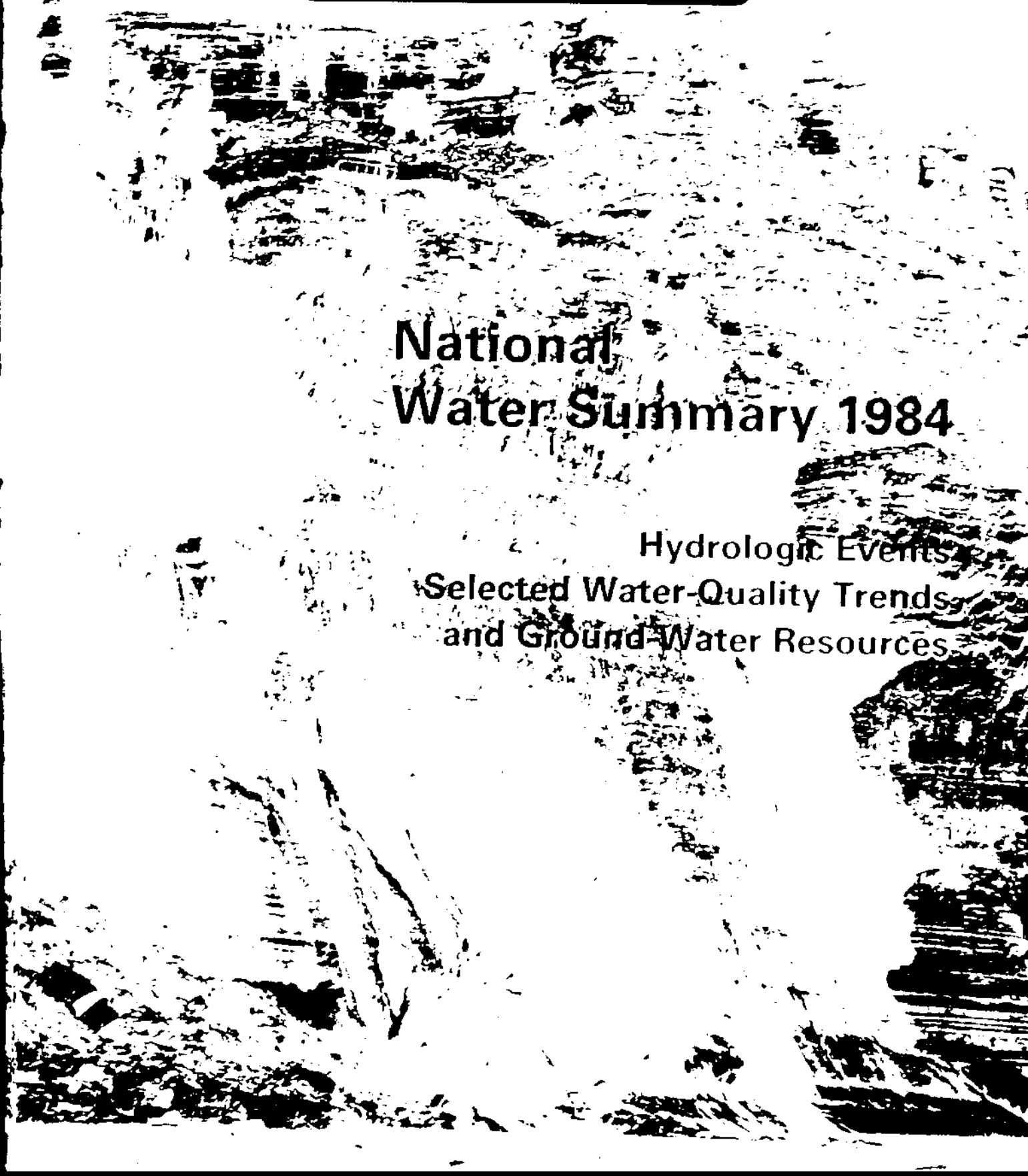


SOURCE: RAINFALL FREQUENCY ATLAS OF THE UNITED STATES, TECHNICAL PAPER NO. 40, U. S. DEPARTMENT OF COMMERCE, U. S. GOVERNMENT PRINTING OFFICE, WASHINGTON, D. C., 1963.

FIGURE 8

1-YEAR 24-HOUR RAINFALL (INCHES)

Reference No. 12



National Water Summary 1984

Hydrologic Events, Selected Water-Quality Trends, and Ground-Water Resources

Table 2. Aquifer and well characteristics in Georgia

[Ft = feet; gal/min = gallons per minute. Sources: Reports of the U.S. Geological Survey and Georgia Geologic Survey]

Aquifer name and description	Well characteristics			Remarks
	Depth (ft)	Yield (gal/min)		
	Common range	Common range	May exceed	
Floridan aquifer system: Limestone, dolomite, and calcareous sand. Generally confined.	40 - 900	1,000 - 5,000	11,000	Supplies 50 percent of ground water in State. Major users include the Savannah, the Brunswick, the Jesup, the St. Marys, the Albany, and the Dougherty Plain areas. Water-level declines at Savannah and Brunswick. Intrusion of brackish water from deeper zones at Brunswick. In some areas, water has natural radioactivity that exceeds State and national drinking-water regulations. Formerly called principal artesian aquifer.
Claiborne aquifer: Sand and sandy limestone. Generally confined.	20 - 450	150 - 600	1,500	Major source of water in southwestern Georgia. Supplies industrial and municipal users at Dougherty, Crisp and Dooly Counties and provides irrigation water north of Dougherty Plain. Called Tertiary sands aquifer in South Carolina and Tennessee. Part of Tertiary sedimentary aquifer system in Alabama.
Clayton aquifer: Limestone and sand. Generally confined.	40 - 800	250 - 600	2,150	Major source of water in southwestern Georgia. Supplies industrial and municipal users at Albany and provides irrigation water northwest of Albany. Water-level declines exceed 100 ft at Albany. Iron concentrations in Randolph County exceed national drinking-water regulations. Part of Tertiary sedimentary aquifer system in Alabama.
Cretaceous aquifer system: Sand and gravel. Generally confined.	30 - 750	50 - 1,200	3,300	Major source of water in east-central Georgia. Supplies water for kaolin mining and processing. Includes Providence aquifer in southwestern Georgia. Water-level declines greater than 50 ft at kaolin mining centers and 100 ft near Albany. Iron concentrations exceed national drinking-water regulations in some areas. Called Black Creek and Middendorf aquifers in South Carolina.
Paleozoic aquifers: Sandstone, limestone, and dolomite; storage is in regolith and fractures and solution openings in rock. Generally unconfined.	15 - 2,100	1 - 50	3,500	Not laterally extensive. Limestone and dolomite aquifers most productive. Springs in limestone and dolostone aquifers discharge at rates of as much as 5,000 gal/min. Sinkholes can form in areas of intensive pumping. Water is generally of good quality, although contamination from septic tanks and farm waste reported in some areas. Laterally equivalent to Paleozoic carbonate aquifers in Alabama and Pennsylvanian sandstone aquifers in Alabama and Tennessee.
Crystalline rock aquifers: Granite, gneiss, schist, and quartzite; storage is in fractures in rock and in regolith. Generally unconfined.	40 - 600	1 - 25	500	Not laterally extensive. Water of good quality with exception of large concentrations of iron and manganese in some areas and contamination from septic tank effluent in densely populated areas.

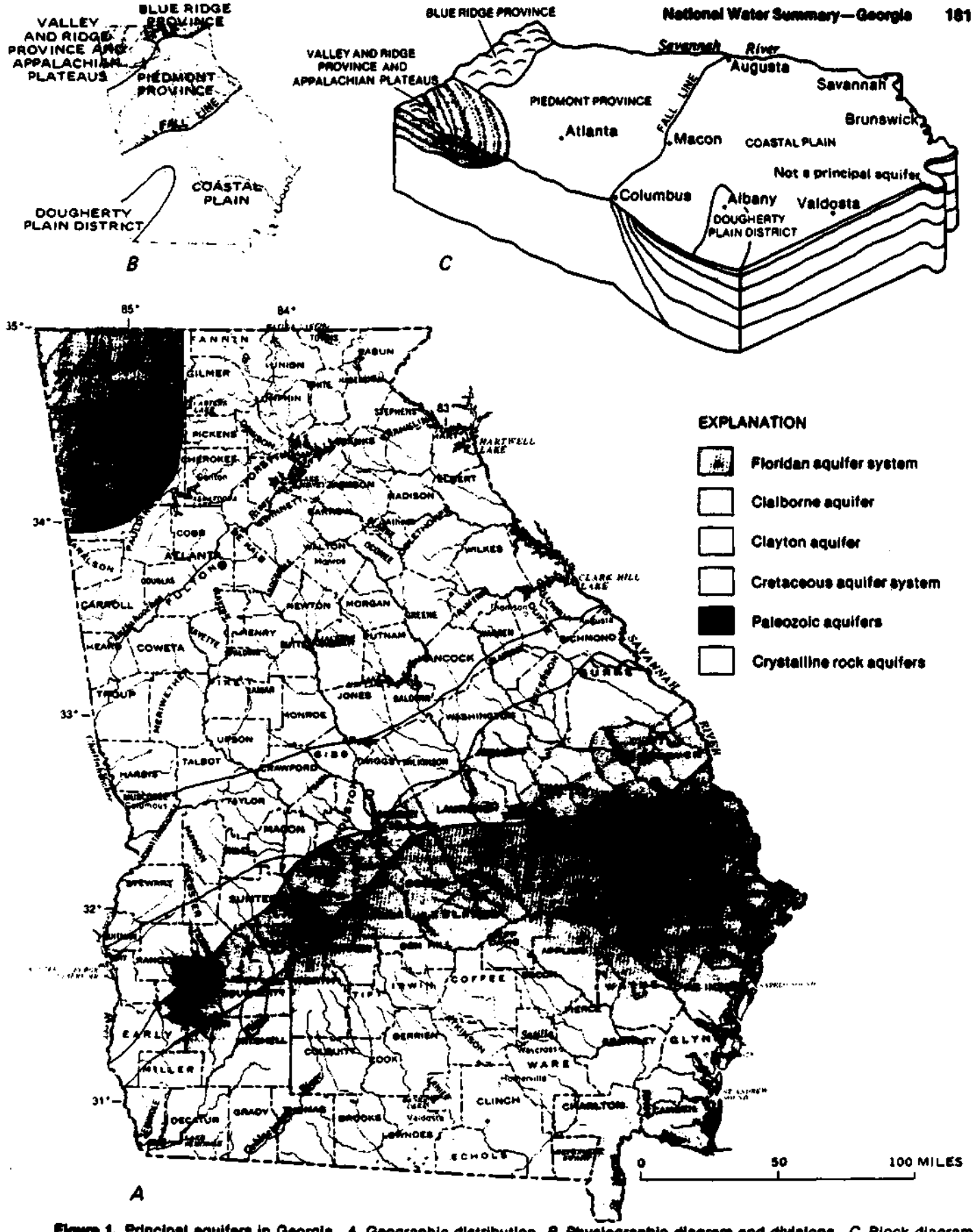


Figure 1. Principal aquifers in Georgia. *A*, Geographic distribution. *B*, Physiographic diagram and divisions. *C*, Block diagram showing principal aquifers and physiographic divisions. (See table 2 for a more detailed description of the aquifers. Sources: *A*, J. S. Clarke, U.S. Geological Survey, written commun., 1984. *B*, Fenneman, 1938; Raisz, 1954. *C*, Modified from Pierce and others, 1984.)

Claiborne Aquifer

The Claiborne aquifer is an important source of water in part of southwestern Georgia (fig. 1) and supplied an estimated 36 Mgal/d in 1980, primarily for irrigation (McFadden and Perriello, 1983). Although the Claiborne aquifer yields water suitable for most uses over most of its extent, naturally occurring concentrations of dissolved solids and chloride in the south-central part of the State have been reported as 22,200 and 11,900 mg/L, respectively (Wait, 1960).

Clayton Aquifer

The Clayton aquifer is an important source of water in southwestern Georgia (fig. 1), where it supplied an estimated 20 Mgal/d in 1980. Most of the withdrawals were for public supply (58 percent) and irrigation (35 percent). With the exception of large concentrations of iron (greater than 0.3 mg/L) in Randolph County, water from the aquifer is suitable for most uses (Clarke and others, 1984).

Cretaceous Aquifer System

The Cretaceous aquifer system is a major source of water in the northern one-third of the Coastal Plain (fig. 1). During 1980, the aquifer system yielded an estimated 128 Mgal/d, primarily for industrial and public-supply use. The aquifer system consists of sand and gravel that locally contain layers of clay and silt which function as confining beds. These confining beds locally separate the aquifer system into two or more aquifers. In southwestern Georgia, the Providence aquifer is part of the Cretaceous aquifer system. Water from the aquifer system is soft (less than 60 mg/L as calcium carbonate), has little dissolved solids (generally less than 100 mg/L), and is of a sodium bicarbonate type that is suitable for most uses. In the center of the area of usage (fig. 1), the iron concentration may be as much as 6.7 mg/L.

Paleozoic Aquifers

Water in the Paleozoic aquifers generally is unconfined, and storage is limited mainly to joints, fractures, and solution openings in the bedrock. During 1980, an estimated 33 Mgal/d was withdrawn from the Paleozoic aquifers, primarily for industrial supply. Wells that tap the Paleozoic aquifers yield differing amounts of water, depending on the aquifer used. Dolostone aquifers typically yield 5 to 50 gallons per minute (gal/min), whereas limestone and sandstone aquifers typically yield 1 to 20 gal/min; maximum reported yields from these aquifers are 3,500 and 300 gal/min, respectively. Springs discharge from the limestone and dolostone aquifers at rates of as much as 5,000 gal/min. Where the limestone and dolostone aquifers are near land surface, pumping can contribute to the formation of sinkholes. Water from wells and springs in the Paleozoic aquifers generally is suitable for most uses, although contamination from septic tanks and farm waste has been reported (Cressler and others, 1976).

Crystalline Rock Aquifers

Although individual crystalline rock aquifers are not laterally extensive, collectively they yielded an estimated 99 Mgal/d in 1980, primarily for rural supply. Ground-water storage occurs in the regolith and where the rocks have joints, fractures, and other types of secondary openings (Cressler and others, 1983). Crystalline rock aquifers in these areas generally are unconfined and show a pronounced response to rainfall, although deep fracture systems commonly are confined. Water from the aquifers generally is suitable for most uses, and, with the exception of iron (as much as 14 mg/L) and manganese (as much as 1.5 mg/L), constituent concentrations rarely exceed national drinking-water regulations (U.S. Environmental Protection Agency, 1982a,b). In some densely populated areas, septic-tank effluent has contaminated the aquifers (Cressler and others, 1983).

GROUND-WATER WITHDRAWALS AND WATER-LEVEL TRENDS

Major areas of ground-water withdrawals and trends in ground-water levels near selected pumping centers are shown in figure 2. With the exception of one center in the Valley and Ridge province (location 1, fig. 2), all major pumping centers are in the Coastal Plain, where aquifers are very productive. The largest pumping center is the Dougherty Plain area where ground-water withdrawal for irrigation exceeds 200 Mgal/d.

The hydrographs shown in figure 2 reflect the responses of aquifers to pumping at selected pumping centers under a variety of hydrologic conditions. In the Floridan aquifer system, large cones of depression have formed at Savannah, Brunswick, Jesup, and St. Marys as a result of pumping for industrial and public supply. At Savannah (location 5, fig 2.), the water level has declined at least 160 feet (ft) since pumping began in the late 1800's (McCollum and Counts, 1964). The hydrograph shows that the water level declined 45 ft from 1954 to 1961 and less than 10 ft from 1961 to 1984. These changes reflect pumping patterns in the area. At Brunswick, the water level in the aquifer system declined 65 ft from predevelopment to 1964 (Wait and Gregg, 1973). The decline continued until 1982 (location 7, fig. 2), then rose about 10 ft as the result of a significant decrease in pumping by a major water user. Near Valdosta (location 9, fig. 2), the water level in the Floridan aquifer system responds to changes in recharge derived from streamflow and to local pumping. The hydrograph shows a moderate long-term response to changing recharge rates and to pumping. Pumpage from the Floridan aquifer system in the Dougherty Plain area (location 11, fig. 2) is primarily for seasonal irrigation which, averaged over the year, exceeded 200 Mgal/d in 1980. In this area, pumpage is scattered widely. Some recharge to the Floridan aquifer system occurs locally. As a result, water-levels recover annually.

In the Albany area (location 10, fig. 2), water is withdrawn from the Tertiary Floridan aquifer system, the Claiborne aquifer, and the Clayton aquifer and the Cretaceous Providence aquifer. Water-level declines of more than 100 ft have occurred in the Clayton and Providence aquifers (Clarke and others, 1983, 1984). The water level in the Clayton aquifer near withdrawal location 10 (fig. 2) generally declined from 1958 to 1984 in response to increased pumping for public supply and agriculture.

The water level in the Cretaceous aquifer system has declined more than 50 ft since 1950 in areas of heavy pumping for public supply and industrial use. However, in the Huber-Warner Robins area (location 4, fig. 2), the water level has not declined significantly from 1975 to 1984 despite a slight increase in ground-water withdrawals during that period.

GROUND-WATER MANAGEMENT

Georgia has a comprehensive set of laws governing the quality and use of ground water. The Ground-Water Use Act of 1972 provided for the permitting of withdrawals for industrial and municipal use that exceed 100,000 gallons per day (gal/d) and authorized the Georgia Environmental Protection Division to issue regulations about reporting, timing of withdrawals, abatement of saltwater encroachment, well depth and spacing, and pumping levels or rates. Amendments to the

Reference No. 13

LOGBOOK REQUIREMENTS
REVISED - NOVEMBER 20, 1989

NOTE: ALL LANGUAGE SHOULD BE FACTUAL AND OBJECTIVE

Record on front cover of the Logbook: TDD No., Site Name, Site Location, Project Manager

All entries are made using ink. Draw a single line through errors. Initial and date corrections.

Statement of Work Plan, Study Plan, and Safety Plan discussion and distribution to field team with team member signatures.

Sign and date each page. Project Manager is to review and sign off on each logbook daily.

Document all calibration and pre-operational checks of equipment. Provide serial numbers of equipment used onsite.

Provide reference to Sampling Field Sheets for detailed sampling information.

Describe sampling locations <u>in detail</u> and document all changes from project planning documents.

Provide a site sketch with sample locations and photo locations.

Maintain photo log by completing the stamped information at the end of the logbook.

11. If no site representative is on hand to accept the receipt for samples an entry to that effect must be placed in the logbook.

12. Record I.D. numbers of COC and receipt for sample forms used. Also record numbers of destroyed documents.

13. Complete [illegible] information in the space provided.

I have read and understood the Phase I work plan for this facility.

Sheri Panabaker
Geoffrey Carter

01

8:[illegible] ≈50°F, overcast
Arrive in Rome, GA
reviewed file material

9:15 arrive at site, the area is an asphalt park lot
- Flat, paved w/islands of grass
- bldgs (shops + stores) around area, brick, banks
- Oostanawa River ≈ 200 yds north of area. There is a steep bank by the
~~9:25 leave site~~ 3/8/87 river with about a 15' drop in about 15 feet. River ≈ 200' from
- There are ≈ 5 churches within a few blocks of the area.
- There are no fences in the area.
- In the center of the parking lot is a drain.
- There are no houses in the immediate vicinity of the area. It is located in the downtown business district of Rome.
- No private wells were located around the facility.
- No wetlands were located near the facility.
- Church (St. Peters Episcopal) on E 1st & 4th

02 Sheri Panabaker

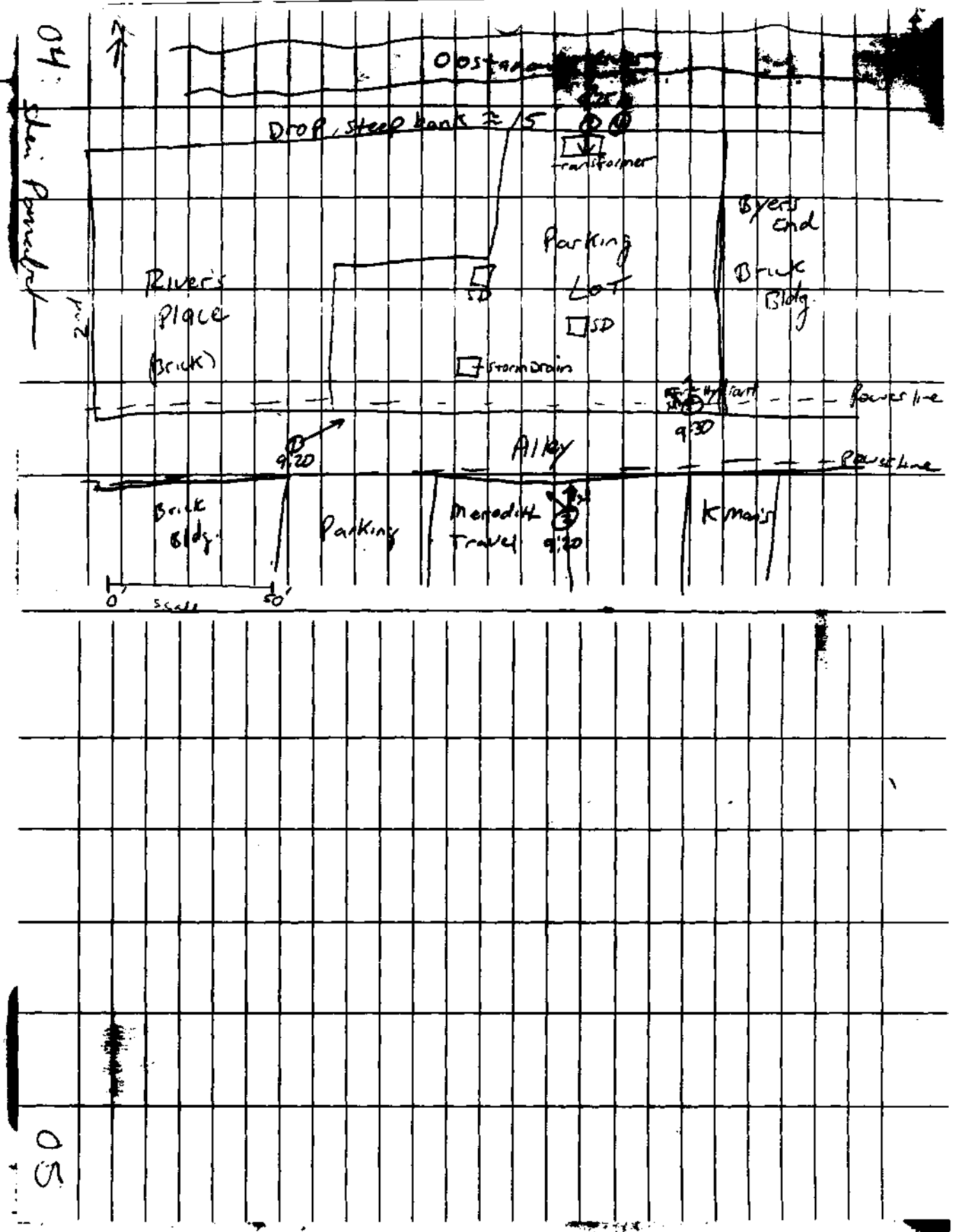
9:25 - left facility.

10:35 arrived at city of Rome water Dept. for information see logbook F4-1290 p.3,4,5, Celanese Fibers TDD F4-8903-06

11:30 Arrive at Floyd County water office. For information see logbook F4-1290, TDD-F4-8903-06 p.5,6,7,8

12:55 Arrived at Tax Assessor's office, & started to look up the facilities on plats. Fed of came in about 10 minutes later. We were late for another apointment so we left.

Sheri Panabaker 03



04
Drop, steep bank ≈ 15
transformer
Byers End
Parking Lot
SD
SD
Brick Bldg.
River's Place (Brick)
Storm Drain
Power line
9:30
9:20
Alley
Power line
Brick Bldg.
Parking
Meredith Travel
9:20
K Mart's
0'
scale
50'
05

TDD # FY-8902-~~95~~ 3/8/89 67
Date 3/8/89 By Sheri Panabaker
Time: 9:20 1
Location: Southwest of site
Picture of: Parking lot where site used to be

TDD # FY-8902-~~95~~ 3/8/89 67
Date 3/8/89 By Sheri Panabaker
Time: 9:20 2
Location: South of site
Picture of: Parking lot where site pit used to be

TDD # FY-8902-~~95~~ 3/8/89 67
Date 3/8/89 By Sheri Panabaker
Time: 9:25 3
Location: North of site
Picture of: Parking lot where site pit used to be

48 Sheri Pan

STANDARD SAMPLE CODES

Water Samples

PW - Private well
PB- Public (Municipal) Well
MW-Monitoring (Permanent) Well
TW - Temporary (Well Point) Well
IW- Industrial Well
SW-Surface Water
SP- Spring Water
LW - Leachate Water

Soil Samples

SS-Surface Soil
SB-Subsurface Soil
SZ-Saturation Zone
SD-Sediment
CS- Composite Soil
LS-Leachate Soil

OTHER CODES

SL-SLUDGE
WA - WASTE
DR - DRUM
QC - Quality Control

All sample codes will consist of at least 6 characters in the following format:

Site Name - Sample Type - Sample Number

Example: Standard Auto Sampling Investigation - Temporary Well Groundwater Sample-Number 08.

Appropriate Code: SA-TW-08

Remember the first six characters have to be in this format. If you need additional identity for a particular sample location, add a suffix.

Example: If you took two subsurface soil samples inthe borehole for Temporary Well #08.

Appropriate Code: SA-SB-08 (A) or SA-SB-08 (S) (Shallow)
SA-SB-08 (B) SA-SB-08 (D) (Deep)

The QC sample code is usually for drilling water and [illegible] samples and not for the Blank and Spike samples. Please [illegible] Blank and Spike samples as we have done in the past.

TDD #
Date By Whom
Time: # keyed to map
Location.

Picture of

TDD # F4-8902-67
Date 3/8/89 By Whom Sheri Pancake
Time 9:25 # keyed to map: 4
Location North of Facility

Picture of: River ≈ 200 yds north of the site

TDD #
Date By Whom
Time # keyed to map
Location

Picture of:

TDD # F4-8902-67
Date 3/8/89 By Whom: Sheri Pancake
Time 9:30 # keyed to map: 5
Location. Southeast of site

Picture of: Parking lot where pit used to be

TDD #
Date By Whom
Time # keyed to map
Location.

Picture of

TDD #
Date By Whom:
Time: # keyed to map:
Location.

Picture of

Sheri Pance

NUS CORPORATION AND SUBSIDI- Reference No. 14 **-ON NOTE**

CONTROL NO.	DATE: March 6, 1989	TIME: 9:35

DISTRIBUTION:

File Material
Rome Coal Tar Pit

BETWEEN: Gary Besser	OF: GA-DNR Fisheries Division	PHONE: (404) 629-1259

AND: Sheri Panabaker, NUS Corporation

DISCUSSION:

I asked Mr. Besser whether there was any commercial or recreational fishing in the Etowah River about 4-5 miles upstream of Rome to Rome. I also asked him about the Coosa River from Rome to the Alabama-Georgia State line, and the oostanaula River north of Rome. He said the rivers are closed to commercial fishing but that they was quite a lot of recreational fishing. He didn't know any exact numbers though.

ACTION ITEMS:

NUS CORPORATION AND SUBSIDIA_ Reference No. 15 **_ON NOTE**

CONTROL NO.	DATE: March 20, 1989	TIME: 1530

DISTRIBUTION:

File
Floyd County, Georgia

BETWEEN: David Goddard	OF: Berry College Water Plant	PHONE: (404) 232-5374 Ext. 2494

AND: Geoffrey Carton, NUS Corporation

DISCUSSION:

The college is served by surface water drawn from the 52-acre Berry Reservoir located northwest of Rome. The water supply serves an average of 2,000 people. The school has emergency connections with both the city and county and can supply or receive water via these connections. The school has some wells for individual residences in the mountains. The well depths range from 200-300 feet. GC

ACTION ITEMS:

HAZARD RANKING SYSTEM SCORING SUMMARY

FOR

ROME COAL TAR PIT
EPA SITE NUMBER GAD981002983
ROME
FLOYD COUNTY, GA
EPA REGION: 4

SCORE STATUS: IN PREPARATION

SCORED BY SHERI PANABAKER
OF NUS CORPORATION
ON 04/19/89

DATE OF THIS REPORT: 04/19/89
DATE OF LAST MODIFICATION: 04/19/89

GROUND WATER ROUTE SCORE	:	4.14
SURFACE WATER ROUTE SCORE	:	12.92
AIR ROUTE SCORE	:	0.00
MIGRATION SCORE	:	7.84

HRS GROUND WATER ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	NO	0	0
2. ROUTE CHARACTERISTICS			
DEPTH TO WATER TABLE	20 FEET		
DEPTH TO BOTTOM OF WASTE	14 FEET		
DEPTH TO AQUIFER OF CONCERN	6 FEET	3	6
PRECIPITATION	54.0 INCHES		
EVAPORATION	39.0 INCHES		
NET PRECIPITATION	15.0 INCHES	2	2
PERMEABILITY	1.0X10-6 CM/SEC	1	1
PHYSICAL STATE		3	3
TOTAL ROUTE CHARACTERISTICS SCORE:			12
3. CONTAINMENT		3	3
4. WASTE CHARACTERISTICS			
TOXICITY/PERSISTENCE:BENZOAPYRENE			18
WASTE QUANTITY CUBIC YDS	~~236~~ 340		
DRUMS	0		
GALLONS	0		
TONS	0 340	5	5
TOTAL	~~236~~ CU. YDS	4	4
TOTAL WASTE CHARACTERISTICS SCORE:			22 23
5. TARGETS			
GROUND WATER USE		1	3
DISTANCE TO NEAREST WELL	> 3 MILES		
AND	MATRIX VALUE	0	0
TOTAL POPULATION SERVED	0 PERSONS		
NUMBER OF HOUSES	0		
NUMBER OF PERSONS	0		
NUMBER OF CONNECTIONS	0		
NUMBER OF IRRIGATED ACRES	0		
TOTAL TARGETS SCORE:			3

GROUND WATER ROUTE SCORE (Sgw) = ~~4~~ 14

HRS SURFACE WATER ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	NO	0	0
2. ROUTE CHARACTERISTICS			
SITE LOCATED IN SURFACE WATER	NO		
SITE WITHIN CLOSED BASIN	NO		
FACILITY SLOPE	0.0 %		
INTERVENING SLOPE	10.0 %	2	2
24-HOUR RAINFALL	3.5 INCHES	3	3
DISTANCE TO DOWN-SLOPE WATER	250 FEET	3	6
PHYSICAL STATE	3		3
TOTAL ROUTE CHARACTERISTICS SCORE:			[illegible]
3. CONTAINMENT	3		[illegible]
4. WASTE CHARACTERISTICS			
TOXICITY/PERSISTENCE:BENZOAPYRENE			18
WASTE QUANTITY CUBIC YDS	236 yd³ see PA		
DRUMS	0		
GALLONS	0		
TONS	0		
TOTAL	236 CU. YDS	4	~~4~~ 5
TOTAL WASTE CHARACTERISTICS SCORE:			~~22~~ 23
5. TARGETS			
SURFACE [illegible]		3	9
DISTANCE [illegible] SENSITIVE ENVIRONMENTS		0	0
COASTAL WETLANDS	NONE		
FRESH-WATER WETLANDS	NONE		
CRITICAL HABITAT	NONE		
DISTANCE TO STATIC WATER	> 3 MILES		
DISTANCE TO WATER SUPPLY INTAKE	> 3 MILES		
AND	MATRIX VALUE	0	0
TOTAL POPULATION SERVED	60838		
NUMBER OF HOUSES	0		
NUMBER OF PERSONS	0		
NUMBER OF CONNECTIONS	16010		
NUMBER OF IRRIGATED ACRES	0		
TOTAL TARGETS SCORE:		13,51	9

SURFACE WATER ROUTE SCORE (Ssw) = 12.92

HRS AIR ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	NO	0	0

2. WASTE CHARACTERISTICS

REACTIVITY:

MATRIX VALUE

INCOMPATIBILITY

TOXICITY

WASTE QUANTITY CUBIC YARDS
DRUMS
GALLONS
TONS

TOTAL

TOTAL WASTE CHARACTERISTICS SCORE: N/A

3. TARGETS

POPULATION WITHIN 4-MILE RADIUS
0 to 0.25 mile
0 to 0.50 mile
0 to 1.0 mile
0 to 4.0 miles

DISTANCE TO SENSITIVE ENVIRONMENTS
COASTAL WETLANDS
FRESH-WATER WETLANDS
CRITICAL HABITAT

DISTANCE TO LAND USES
COMME[illegible]IAL
PARK/[illegible]NTIAL
AGRIC[illegible]
PRIME[illegible]LAND
HISTOR[illegible]WITHIN VIEW?

TOTAL TARGETS SCORE: N/A

AIR ROUTE SCORE (Sa) = 0.00

HAZARD RANKING SYSTEM SCORING CALCULATIONS
FOR
SITE: ROME COAL TAR PIT
AS OF 04/19/89

GROUND WATER ROUTE SCORE

ROUTE CHARACTERISTICS		12
CONTAINMENT	X	3
WASTE CHARACTERISTICS	X	22
TARGETS	X	3

= 2376 /57,330 X 100 = 4.14 = S_{gw}

SURFACE WATER ROUTE SCORE

ROUTE CHARACTERISTICS		14
CONTAINMENT	X	3
WASTE CHARACTERISTICS	X	22
TARGETS	X	9

= 8316 /64,350 X 100 = 12.92 = S_{sw}

AIR ROUTE SCORE

OBSERVED RELEASE 0 /35,100 X 100 = 0.00 = S_{air}

SUMMARY OF MIGRATION SCORE CALCULATIONS

	S	S^2	
GROUND WATER ROUTE SCORE (S_{gw})	4.14	17.14	18.77
SURFACE WATER ROUTE SCORE (S_{sw})	12.92	166.93	182.52
AIR ROUTE SCORE (S_{air})	0.00	0.00	
$S^2_{gw} + S^2_{sw} + S^2_{air}$		184.07	201.29
$\sqrt{(S^2_{gw} + S^2_{sw} + S^2_{air})}$		13.57	14.18
$S_M = \sqrt{(S^2_{gw} + S^2_{sw} + S^2_{air})}/1.73$		7.84	8.2

RCRA/NPL POLICY QUESTIONNAIRE FOR INITIAL SCREENING

Site Name: Rome Coal Tar Pit

City: Rome State: Georgia

EPA I.D. Number: GAD981002983

Type of Facility: Non-handler ✓ Generator____ Transporter____ Disposal____
Treatment____ Storage (more than 90 days)____

I. RCRA APPLICABILITY	yes	no
Has this facility treated, stored or disposed of a RCRA hazardous waste since Nov. 19, 1980?	___	✓
Has a RCRA Facility Assessment (RFA) been performed on this site?	___	✓
Does the facility have a RCRA operating or post-closure permit? If so, date issued _____	___	✓
Did the facility file a RCRA Part A application?	___	✓
If so:		
1) Does the facility currently have interim status?	___	✓
2) Did the facility withdraw its interim status?	___	✓
3) Is the facility a known or possible protective filer?	___	✓
Is the facility a late (after Nov. 19, 1980) or non-filer that has been identified by EPA or the State?	___	✓

STOP HERE IF ALL ANSWERS TO QUESTIONS IN SECTION I ARE NO

II. FINANCIAL STATUS		
Is the facility owned by an entity that has filed for bankruptcy under federal or State laws?	___	✓

III. RCRA ENFORCEMENT STATUS		
Has the facility lost authorization to operate or had its interim status revoked?	___	✓
Has the facility been involved in any other RCRA enforcement action?	___	✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

IN THE MATTER OF:	)	
	)	
Rome Coal Tar Site	)	Proceeding Under Section 122(h)(1)
Rome, Georgia	)	of the Comprehensive Environmental
	)	Response, Compensation and
	)	Liability Act of 1980, 42 U.S.C.
Atlanta Gas Light Company	)	Section 9622(h)(1), as amended by
	)	the Superfund Amendments and
Respondent	)	Reauthorization Act of 1986,
	)	Pub. L. No. 99-499.

COST RECOVERY AGREEMENT

This Agreement is made and entered into by the U.S. Environmental Protection Agency ("EPA"), and Atlanta Gas Light Company ("Settling Party"). The purpose of this Agreement is for EPA to recover response costs incurred at or in connection with the Rome Coal Tar Site ("Site") in Rome, Georgia, and to resolve the liability of the Settling Party for such response costs. EPA is authorized to enter into this Agreement pursuant to the authority vested in the Administrator of the EPA by Section 122(h)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499 ("CERCLA"), which authority has been delegated to the Regional Administrators of the EPA by EPA Delegation No. 14-14-D (September 13, 1987).

This Agreement shall be binding upon EPA and shall be binding upon the Settling Party, its directors, officers, employees, agents, successors and assigns. Each signatory to this Agreement represents that he or she is fully authorized to enter into the terms and conditions of this Agreement and to legally bind the party represented by him or her. The Settling Party agrees to undertake all actions required by this Agreement. The Settling Party consents to and will not contest EPA's authority to enter into this Agreement or to implement or enforce its terms.

WHEREAS, EPA alleges that hazardous substances, pollutants, and/or contaminants as defined in Sections 101(14) and 101(33) of CERCLA, 42 U.S.C. Sections 9601(14) and 9601(33), have been or are threatened to be released into the environment from the Site;

WHEREAS, EPA alleges that such releases or threatened releases required response action to be undertaken at the Site pursuant to Section 104 of CERCLA, 42 U.S.C. Section 9604, which response action during May 1985 included the removal and proper disposal of the coal tar and contaminated materials; adding kiln dust to the Site materials to stablize them; and capping the pit.

WHEREAS, EPA alleges that in performing this response action, response costs have been incurred at or in connection with the Site totalling approximately $118,249.00 as of May 19, 1988

WHEREAS, EPA alleges that the Settling Party is a responsible party pursuant to Section 107(a) of CERCLA, 42 U.S.C. Section 9607(a), and is liable for response costs incurred and to be incurred at or in connection with the ~~the~~ Site;

cms

WHEREAS, the Settling Party does not admit or deny any of EPA's allegations; and

WHEREAS, EPA and the Settling Party desire to settle certain claims arising from the Settling Party alleged involvement with the Site without litigation and without the admission or adjudication of any issue of fact ~~or~~ or CMB law; fb

NOW, THEREFORE, EPA and the Settling Party, in consideration of the promises and covenants herein, and intending to be legally bound hereby, agree as follows:

1. The Settling Party agrees to pay to the Hazardous Substance Superfund a total amount of $75,000.00 within ten (10) days of the effective date of this Agreement.

2. Payment shall be made by ~~certified or cashier's~~ CMB fb check, made payable to "EPA-Hazardous Substance Superfund." The check or checks shall reference the name of the Settling Party and the Site and shall be sent to:

EPA Superfund
Superfund Accounting
P.O. Box 371003M
Pittsburgh, Pennsylvania 15251
ATTN: Collection Officer for Superfund

3. Settling Party shall simultaneously send a copy of its check to Etta Sheldon, Esq., Civil Investigator,:

United States Environmental Protection Agency
Investigation Support Section
Waste Management Division
345 Courtland St., N.E.
Atlanta, GA 30365

4. In addition to any other remedies or sanctions available to EPA, if the Settling Party fails or refuses to comply with any term or condition of this Agreement, Settling Party shall be subject to enforcement action pursuant to Section 122(h)(3) of CERCLA.

5. Subject to Paragraph 6 of this Agreement, upon payment of the amount specified in Paragraph 1 of this Agreement, EPA covenants not to sue or to take any other civil or administrative action against the Settling Party for "Covered Matters." "Covered Matters" shall include any and all civil liability under Section 107(a) of CERCLA, 42 U.S.C. Section 9607(a), for reimbursement of response costs incurred at or in connection with the Site as of ~~May 19, 1988.~~ the date of this Agreement. Such response costs were incurred in connection with the emergency removal and disposal of coal tar and contaminated soil at the Site during May 1985.

6. Nothing in this Agreement is intended to be nor shall it be construed as a release or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which EPA may have against the Settling Party for:

a) any continuing liability as a result of failure to make the payments required by Paragraph 1 of this Agreement; or

b) any matters not expressly included in "Covered Matters", including, without limitation, any liability for damages to natural resources.

7. Nothing in this Agreement is intended to be nor shall it be construed as a release or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which EPA may have against any person, firm, corporation or other entity not a signatory to this Agreement.

8. In consideration of EPA's covenant not to sue, contained in Paragraph 5 of this Agreement, the Settling Party agrees not to assert any claims or causes of action against the United States or the Hazardous Substance Superfund arising out of response activities undertaken at the Site, or to seek any other costs, damages, or attorney's fees from the United States, its agencies, employees or contractors arising out of response activities undertaken at the Site.

9. Subject to Paragraph 6 of this Agreement, EPA agrees that by entering into and carrying out the terms of this Agreement, Settling Party will have resolved its liability to the United States for "Covered Matters" pursuant to Section 113(f)(2) of CERCLA and shall not be liable for claims for "Covered Matters."

10. This Agreement shall be subject to a thirty-day public comment period pursuant to Section 122(i) of CERCLA. In accordance with Section 122(i)(3) of CERCLA, EPA may withdraw its consent to this Agreement if comments received disclose facts or considerations which indicate that this Agreement is inappropriate, improper or inadequate.

11. The Regional Administrator of EPA, Region IV, has determined that the total response costs incurred to date at or in connection with the Site do not exceed $500,000.00 excluding interest, and that, based upon information currently available to EPA, total response costs at or in connection with the Site are not anticipated to exceed $500,000.00 excluding interest, in the future.

12. The effective date of this Agreement shall be the date upon which EPA issues written notice to the Settling Party that the public comment period pursuant to Paragraph 10 of this Agreement has closed and that comments received, if any, do not require modification of this Agreement or EPA withdrawal from the Agreement.

IT IS SO AGREED:

BY: Lee A. DeHihus III for 8/18/88
Greer C. Tidwell DATE
Regional Administrator
U.S. EPA - Region IV

By: Charles W. Bass, Vice President 8-17-88
Atlanta Gas Light Company DATE

M.2 - SITE MAINTENANCE FORM

* ACTION: _ *

EPA ID : GAD981002983

SITE NAME: ROME COAL TAR PIT SOURCE: R

STREET : JCT BROAD ST & 2ND AVE CONG DIST: 07

CITY : ROME ZIP: 30161

CNTY NAME: FLOYD CNTY CODE : 115

LATITUDE : 34/15/12.5 LONGITUDE : 085/10/23.5

LL-SOURCE: R LL-ACCURACY:

SMSA : HYDRO UNIT: 03150104

INVENTORY IND: Y REMEDIAL IND: Y REMOVAL IND: N FED FAC IND: N

NPL IND: N NPL LISTING DATE: NPL DELISTING DATE:

SITE/SPILL IDS: K2

RPM NAME: UNASSIGNED RPM PHONE: 404-347-2234

SITE CLASSIFICATION: SITE APPROACH:

DIOXIN TIER: REG FLD1: REG FLD2:

RESP TERM: PENDING ( ) NO FURTHER ACTION ( )

ENF DISP: NO VIABLE RESP PARTY ( ) VOLUNTARY RESPONSE ( )
ENFORCED RESPONSE ( ) COST RECOVERY ( )

SITE DESCRIPTION:

COAL TAR PIT IS COMBUSTIBLE AND MAY CONTAIN TOXIC MATERIALS.

PENDING (_) NO FURTHER ACTION (_)

M.2 - PROGRAM MAINTENANCE FORM

ACTION: _

SITE: ROME COAL TAR PIT

EPA ID: GAD981002983 PROGRAM CODE: H01 PROGRAM TYPE:

PROGRAM QUALIFIER: ALIAS LINK :

PROGRAM NAME: SITE EVALUATION

DESCRIPTION:

M.2 - EVENT MAINTENANCE FORM

* ACTION: _ *

SITE: ROME COAL TAR PIT
PROGRAM: SITE EVALUATION

EPA ID: GAD981002983 PROGRAM CODE: H01 EVENT TYPE: DS1

FMS CODE: EVENT QUALIFIER : EVENT LEAD: E * _ __ _ *

EVENT NAME: DISCOVERY STATUS: * _____ _ *

DESCRIPTION:

* _____ *
* _____ *
* _____ *
* _____ *

ORIGINAL	CURRENT	ACTUAL			
START:	START:	START:	__/__/__	__/__/__	__/__/__
COMP :	COMP :	COMP : 05/14/85	__/__/__	__/__/__	__/__/__

HQ COMMENT:

* _____ *

RG COMMENT:

* _____ *

COOP AGR #	AMENDMENT #	STATUS	STATE %				
			0	_____	_____	__	__

M.2 - EVENT MAINTENANCE FORM

* ACTION: _ *

SITE: ROME COAL TAR PIT
PROGRAM: SITE EVALUATION

EPA ID: GAD981002983 PROGRAM CODE: H01 EVENT TYPE: PA1

FMS CODE: EVENT QUALIFIER : EVENT LEAD: S

EVENT NAME: PRELIMINARY ASSESSMENT STATUS:

DESCRIPTION:

ORIGINAL	CURRENT	ACTUAL
START:	START:	START: 06/10/85
COMP :	COMP :	COMP : 12/10/85

HQ COMMENT:

RG COMMENT:

COOP AGR #	AMENDMENT #	STATUS	STATE %
			0

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

RUN DATE: 05/07/86
RUN TIME: 20:39:59

M.2 - SITE MAINTENANCE FORM

* ACTION: _ *

EPA ID: GAD981002983

SITE NAME: ROME COAL TAR PIT SOURCE: R

STREET: JCT BROAD ST & 2ND AVE CONG DIST: 07

CITY: ROME ZIP: 30161

CNTY NAME: FLOYD CNTY CODE: 115

LATITUDE: 34/15/12.5 LONGITUDE: 085/10/23.5

SMSA: HYDRO UNIT: 03150104

INVENTORY IND: Y REMEDIAL IND: Y REMOVAL IND: N FED FAC IND: N

NPL IND: N NPL LISTING DATE: NPL DELISTING DATE:

APPROACH: SITE CLASS:

SITE/SPILL IDS:

RPM NAME: RPM PHONE: - -

DIOXIN TIER: REG FLD1: REG FLD2:

RESP TERM: PENDING (X) NO FURTHER ACTION ( ) * PENDING (_) NO FURTHER ACTION (_)

ENF DISP: NO VIABLE RESP PARTY ( ) VOLUNTARY RESPONSE ( )

ENFORCED RESPONSE ( ) COST RECOVERY ( )

SITE DESCRIPTION:

COAL TAR PIT IS COMBUSTIBLE AND MAY CONTAIN TOXIC MATERIALS.

M.2 - PROGRAM MAINTENANCE FORM

SITE: ROME COAL TAR PIT

EPA ID: GAD981002983 PROGRAM CODE: H01 PROGRAM TYPE:

PROGRAM QUALIFIER: ALIAS LINK :

PROGRAM NAME: SITE EVALUATION

DESCRIPTION:

* ACTION: _

M.2 - EVENT MAINTENANCE FORM

* ACTION: _ *

SITE: ROME COAL TAR PIT
PROGRAM: SITE EVALUATION

EPA ID: GAD981002983 PROGRAM CODE: H01 EVENT TYPE: DSI

FMS CODE: EVENT QUALIFIER: EVENT LEAD: E

EVENT NAME: DISCOVERY STATUS:

DESCRIPTION:

	ORIGINAL	CURRENT	ACTUAL
START:		START:	START:
COMP :		COMP :	COMP : 85/05/14

HQ COMMENT:

RG COMMENT:

COOP AGR #	AMENDMENT #	STATUS	STATE %

Rome I Site
Floyd Co.

Courier-Journal
Page 2
145th Year

Tar pit stalls 'Place'

Who's liable?

[illegible]

[illegible] work cost the city [illegible] second [illegible]

[illegible] found [illegible] was ruled as "potentially [illegible] environmental [illegible]

[illegible] working closely with [illegible] this problem, to [illegible] we're running up against [illegible] time," Robbins said.

[illegible] tar was discovered [illegible] this [illegible] to property owners [illegible] Davenport Drive. [illegible] would be [illegible] workers had moved [illegible]

[illegible] as we're concerned, the [illegible] of Davenport Drive is one [illegible] first priorities," he said. "If we had [illegible] we'd haul the tar back to Rivers' [illegible] and put it back in the pits where it [illegible] Then, we'd make arrangements to have all of it taken away at one time."

Immediately, though, Robbins said officials are waiting for results from separate chemical-analysis tests on the tar

Please see Rivers, page 5

Rivers [illegible]

[illegible] ty.

These tests will be used to support a [illegible] study of the ground surrounding the tar pits, he said. That study will be done by a private firm on contract with EC Systems Inc.

"That's where we are now," Robbins said. "We'll have to contract with a firm to complete a ground-[illegible] of the land at Rivers Park."

Robbins said it could be 30 to 45 days before the firm begins such a study.

"Only after we begin to find out what we're up against, we're faced with a liability," he said.

[illegible] at the heart of the issue, Robbins said, is who originally buried the tar [illegible] and who is legally responsible to remove it.

[illegible] reveals that the tar was created as a by-product of a [illegible] gas-company operation [illegible] of the century.

[illegible] Systems Inc. officials said [illegible] that the company will take [illegible] responsibility for the [illegible] tar [illegible] money," [illegible] wouldn't have [illegible] if we had known

Sue

ERCS CONTRACTOR PERFORMANCE SUMMARY

1. CONTRACT NO. 68-01-6859	2. DELIVERY ORDER NO. 6859-04-064	3. EPA REGION/USCG DISTRICT: IV
4. DELIVERY ORDER CEILING AMOUNT: $100,000	5. ZONE: II	
6. RESPONSE LOCATION: (*Site Name, Address and Zip Code*) Rome Coal Tar Site Rome, Ga.	7. ISSUED TO: CONTRACTOR (*Name*) Hazardous Waste Technology Services	
	8. RESPONSE MANAGER: (*Name and Phone No.*) Tracy Bergquist 404-981-9332	
	9. ON-SCENE COORDINATOR: (*Name and Phone No.*) Susan M. Fields 404-881-2216	

10. DESCRIBE SCOPE OF WORK:

Removal and disposal of hazardous waste and contaminated soil from the coal tar pit on site, and sampling and analysis of the coal tar waste.

11. PERSONNEL AND EQUIPMENT ON SITE WITHIN REQUIRED RESPONSE TIME? COMMENT:

Yes

12. WORK PERFORMED BY: ERCS CONTRACTOR X SUBCONTRACTOR: (*Name*)	13. INITIAL COST ESTIMATE: $90,000 FINAL COST: $95,000
14. ANY PROBLEMS RESULTING FROM USE OF SUBCONTRACTOR? NA	15. REASONS FOR COST SAVINGS/OVERRUN, IF ANY: Material heavier than anticipated

16. EVALUATION OF CONTRACTOR'S COST CONTROLS:

Good

17. DAILY COST REPORTS: CURRENT X ACCURATE X

18. WORK COMPLETED WITHIN ORIGINAL TIME FRAME? IF NOT, EXPLAIN:

Yes

SHEET 1 WHITE — OSC COPY
SHEET 2 CANARY — DPO RETENTION COPY
SHEET 3 PINK — PROJECT OFFICER COPY
SHEET 4 GOLD — CONTRACTING OFFICER COPY

sue

ERCS CONTRACTOR PERFORMANCE SUMMARY

CONTRACT NO.	DELIVERY ORDER NO.
68-01-6859	6859-04-064

19. PERSONNEL AND EQUIPMENT USED IN AN EFFICIENT MANNER? COMMENT:

YES

20. INTERACTIONS BETWEEN ERCS CONTRACTOR AND OTHER ON-SCENE PERSONNEL *(i.e., TAT, REM/FIT, State Personnel)*

☒ GOOD ☐ SATISFACTORY ☐ UNSATISFACTORY COMMENT:

Personnel worked very well together

21. NECESSARY SAFETY PRECAUTIONS TAKEN? ☒ YES ☐ NO COMMENT:

22. UNUSUAL PROBLEMS/OCCURRENCES AFFECTING CONTRACTOR'S PERFORMANCE:

NONE

23. OVERALL ASSESSMENT OF CONTRACTOR'S PERFORMANCE: *(Additional pages may be added, as necessary)*

Satisfactory

SUSAN M. FIELDS	Susan M Fields	10/10/85
Name of On-Scene Coordinator	*Signature*	*Date*

SHEET 1 WHITE OSC COPY
SHEET 2 CANARY DPO RETENTION COPY
SHEET 3 PINK PROJECT OFFICER COPY
SHEET 4 GOLD CONTRACTING OFFICER COPY

STANDARD FORM 30, JULY 1966
GENERAL SERVICES ADMINISTRATION
FED. PROC. REG. (41 CFR) 1-16.101

AMENDMENT OF SOLICITATION/MODIFICATION OF CONTRACT

PAGE 1 OF 1

1. AMENDMENT/MODIFICATION NO.	2. EFFECTIVE DATE	3. REQUISITION/PURCHASE REQUEST NO.	4. PROJECT NO. (If applicable)
ONE (1)	JUN 10 1985	WA85-H258	

5. ISSUED BY CODE

Environmental Protection Agency
Procurement Section H
401 M Street, S.W. (PM-214-F)
Washington, D.C. 20460

6. ADMINISTERED BY (If other than block 5) CODE

7. CONTRACTOR NAME AND ADDRESS CODE FACILITY CODE

(Street, city, county, state, and ZIP Code)

Hazardous Waste Technology Services, Inc.
5280 Panola Industrial Blvd
Decatur, Georgia 30035

8. ☐ AMENDMENT OF SOLICITATION NO. _____

DATED _____ (See block 9)

☒ MODIFICATION OF CONTRACT/ORDER NO. 68-01-6859
D.O.: 6859-04-064

DATED 05/14/85 (See block 11)

9. THIS BLOCK APPLIES ONLY TO AMENDMENTS OF SOLICITATIONS

☐ The above numbered solicitation is amended as set forth in block 12. The hour and date specified for receipt of Offers ☐ is extended, ☐ is not extended.

Offerors must acknowledge receipt of this amendment prior to the hour and date specified in the solicitation, or as amended, by one of the following methods: (a) By signing and returning _____ copies of this amendment; (b) By acknowledging receipt of this amendment on each copy of the offer submitted; or (c) By separate letter or telegram which includes a reference to the solicitation and amendment numbers. FAILURE OF YOUR ACKNOWLEDGEMENT TO BE RECEIVED AT THE ISSUING OFFICE PRIOR TO THE HOUR AND DATE SPECIFIED MAY RESULT IN REJECTION OF YOUR OFFER. If, by virtue of this amendment you desire to change an offer already submitted, such change may be made by telegram or letter, provided such telegram or letter makes reference to the solicitation and this amendment, and is received prior to the opening hour and date specified.

10. ACCOUNTING AND APPROPRIATION DATA (If required)

	Obligate	City	County	State	Dist
C-1: 68/20X8145 CK2002 5TFA04DEK2 25.35	$10,000.00	66668	115	13	007

11. THIS BLOCK APPLIES ONLY TO MODIFICATIONS OF CONTRACTS/ORDERS

(a) ☐ This Change Order is issued pursuant to: _____

The changes set forth in block 12 are made in the above numbered contract/order.

(b) ☒ The above numbered contract/order is modified to reflect the administrative changes (such as changes in paying office, appropriation data, etc.) set forth in block 12.

(c) ☐ This Supplemental Agreement is entered into pursuant to authority of: _____

It modifies the above numbered contract as set forth in block 12.

12. DESCRIPTION OF AMENDMENT/MODIFICATION

Pursuant to ARTICLE VII, Section I of the subject contract, this delivery order is hereby modified as follows:

1. Block #5: The ceiling is increased from $90,000.00 to $100,000.00.

2. Except as expressly specified above, all other terms and conditions remain unchanged and in full force and effect.

Except as provided herein, all terms and conditions of the document referenced in block 8, as heretofore changed, remain unchanged and in full force and effect.

13. ☒ CONTRACTOR/OFFEROR IS NOT REQUIRED TO SIGN THIS DOCUMENT ☐ CONTRACTOR/OFFEROR IS REQUIRED TO SIGN THIS DOCUMENT AND RETURN _____ COPIES TO ISSUING OFFICE

14. NAME OF CONTRACTOR/OFFEROR

BY _____
(Signature of person authorized to sign)

17. UNITED STATES OF AMERICA

BY Thomas A. O'Connell
(Signature of Contracting Officer)

15. NAME AND TITLE OF SIGNER (Type or print)	16. DATE SIGNED	18. NAME OF CONTRACTING OFFICER (Type or print)	19. DATE SIGNED
		Thomas A. O'Connell	6/10/85

30-101

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

PROCUREMENT REQUEST/ORDER

1. NAME OF ORIGINATOR: Sue Fields		2. DATE OF REQUISITION: 5/24/85
3. MAIL CODE	4. TELEPHONE NUMBER: FTS-257-3931	5. DATE ITEM REQUIRED
6. SIGNATURE OF ORIGINATOR	7. RECOMMENDED PROCUREMENT METHOD ☐ Competitive ☐ Noncompetitive	

8. DELIVER TO *(Project Manager)* Sue Fields	9. ADDRESS 345 Courtland St. Atl. GA	10. MAIL CODE	11. TELEPHONE NUMBER FTS-257-3931

12. FINANCIAL DATA
(a) APPROPRIATION 68-2025145

NOTE: ITEM 12 (c) DOCUMENT TYPE—CONTRACT = "C," PURCHASE ORDER = "P," IGA = "A," OTHER *(Misc.)* = "X"

FMO USE (b) *(13 digits)*	DT (c)	DOCUMENT CONTROL NUMBER (d) *(6 digits)*	ACCOUNT NUMBER (e) *(10 digits)*	OBJECT CLASS (f) *(4 digits)*	AMOUNT (g) DOLLARS	CTS.
		CK2042	5YT0.0EEC2	25.15	10,000	

13. SUGGESTED SOURCE *(Name, Address, ZIP Code, Phone/Contact)*	14. AMOUNT OF MONEY COMMITTED IS: ☒ ORIGINAL ☐ INCREASE ☐ DECREASE	15. CONTRACTING OFFICE ☐ IS ☐ IS NOT AUTHORIZED TO EXCEED AMOUNT SHOWN BY 10% 16. SERVICING FINANCE OFFICE NUMBER

17. APPROVALS

a. BRANCH/OFFICE	DATE	d. PROPERTY MANAGEMENT OFFICER/DESIGNEE	DATE
b. DIVISION/OFFICE	DATE	e. OTHER *(Specify)*	DATE
c. FUNDS LISTED ABOVE ARE AVAILABLE AND RESERVED	DATE	e. OTHER *(Specify)*	DATE

18. DATE OF ORDER	19. ORDER NUMBER	20. CONTRACT NUMBER *(if any)*	21. DISCOUNT TERMS

22. FOB POINT	23. DELIVERY TO FOB POINT BY *On or before (Date)*	24. PERSON TAKING ORDER/QUOTE AND PHONE NO.

25. CONTRACTOR *(Name, address, ZIP Code)*

26. TYPE OF ORDER
☐ a. PURCHASE

REFERENCE YOUR QUOTE *(See Block 24)*

PLEASE FURNISH THE ABOVE ON THE TERMS SPECIFIED ON BOTH SIDES OF THIS ORDER AND ON THE ATTACHED SHEETS, IF ANY, INCLUDING DELIVERY AS INDICATED. THE PURCHASE IS NEGOTIATED UNDER AUTHORITY OF 41 USC 252(c) ( ).

☐ b. DELIVERY PROVISIONS ON THE REVERSE ARE DELETED. THE DELIVERY ORDER IS SUBJECT TO THE TERMS AND CONDITIONS OF THE CONTRACT. *(See Block 20)*

c. ☐ ORAL ☐ WRITTEN ☐ CONFIRMING

27. SCHEDULE

ITEM NUMBER (a)	SUPPLIES OR SERVICES (b)	QUANTITY ORDERED (c)	UNIT (d)	ESTIMATED UNIT PRICE (e)	UNIT PRICE (f)	AMOUNT (g)	QUANTITY ACCEPTED (h)
	Ceiling increase for Rome Coal Tar Site Rome, GA						
					TOTAL ▶		

28. UNITED STATES OF AMERICA BY *(Signature)*	29. TYPED NAME AND TITLE OF CONTRACTING OFFICER

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

PROCUREMENT REQUEST/ORDER

1. NAME OF ORIGINATOR: Sue Fields
2. DATE OF REQUISITION: 4/15/85
3. MAIL CODE:
4. TELEPHONE NUMBER: 770-257-2216
5. DATE ITEM REQUIRED:
6. SIGNATURE OF ORIGINATOR:
7. RECOMMENDED PROCUREMENT METHOD: ☐ Competitive ☐ Noncompetitive
8. DELIVER TO *(Project Manager)*: Sue Fields
9. ADDRESS: 345 Courtland St. NE, GA
10. MAIL CODE:
11. TELEPHONE NUMBER: 770-257-2216
12. FINANCIAL DATA
(a) APPROPRIATION: 68-20X0145

NOTE: ITEM 12 (c) DOCUMENT TYPE—CONTRACT = "C," PURCHASE ORDER = "P," IGA = "A," OTHER *(Misc.)* = "X"

FMO USE (b) *(13 digits)*	DT (c)	DOCUMENT CONTROL NUMBER (d) *(6 digits)*	ACCOUNT NUMBER (e) *(10 digits)*	OBJECT CLASS (f) *(4 digits)*	AMOUNT (g) DOLLARS	CTS.
		CX2001	2YR04DEC2	25.35	90,000	

13. SUGGESTED SOURCE *(Name, Address, ZIP Code, Phone/Contact)*:
14. AMOUNT OF MONEY COMMITTED IS: ☒ ORIGINAL ☐ INCREASE ☐ DECREASE
15. CONTRACTING OFFICE ☐ IS ☐ IS NOT AUTHORIZED TO EXCEED AMOUNT SHOWN BY 10%
16. SERVICING FINANCE OFFICE NUMBER:

17. APPROVALS

a. BRANCH/OFFICE	DATE	d. PROPERTY MANAGEMENT OFFICER/DESIGNEE	DATE
b. DIVISION/OFFICE	DATE	e. OTHER *(Specify)*	DATE
c. FUNDS LISTED ABOVE ARE AVAILABLE AND RESERVED	DATE	e. OTHER *(Specify)*	DATE

18. DATE OF ORDER: 5/14/85
19. ORDER NUMBER: 4859-04-064
20. CONTRACT NUMBER *(if any)*: 68-01-4859
21. DISCOUNT TERMS:
22. FOB POINT:
23. DELIVERY TO FOB POINT BY *On or before (Date)*:
24. PERSON TAKING ORDER/QUOTE AND PHONE NO.:
25. CONTRACTOR *(Name, address, ZIP Code)*:
26. TYPE OF ORDER
☐ a. PURCHASE
REFERENCE YOUR QUOTE *(See Block 24)*

PLEASE FURNISH THE ABOVE ON THE TERMS SPECIFIED ON BOTH SIDES OF THIS ORDER AND ON THE ATTACHED SHEETS, IF ANY, INCLUDING DELIVERY AS INDICATED. THE PURCHASE IS NEGOTIATED UNDER AUTHORITY OF 41 USC 252(c) ( ).

☐ b. DELIVERY PROVISIONS ON THE REVERSE ARE DELETED. THE DELIVERY ORDER IS SUBJECT TO THE TERMS AND CONDITIONS OF THE CONTRACT. *(See Block 20)*

c. ☐ ORAL ☐ WRITTEN ☐ CONFIRMING

27. SCHEDULE

ITEM NUMBER (a)	SUPPLIES OR SERVICES (b)	QUANTITY ORDERED (c)	UNIT (d)	ESTIMATED UNIT PRICE (e)	UNIT PRICE (f)	AMOUNT (g)	QUANTITY ACCEPTED (h)
	Immediate removal for Rome Coal Tar Site, Rome, GA						
					TOTAL $		

28. UNITED STATES OF AMERICA BY *(Signature)*:
29. TYPED NAME AND TITLE OF CONTRACTING OFFICER:

EPA Form 1900-8 (Rev. 4-84) Replaces previous editions, and EPA Form 1900-8T, which are obsolete.

COPY 10 -- ORIGINATOR

DELIVERY ORDER FOR EMERGENCY RESPONSE CLEANUP SERVICES

(This delivery order is issued subject to all terms and conditions of the contract identified in Block 2.)

1. DATE OF ORDER	2. CONTRACT NUMBER	3. ORDER NUMBER
May 14, 1985	68-01-6859	6859-04-064

4. TIME OF INITIAL ORDER *(If initial order was verbal) (Specify Time Zone)*

4:00 (Eastern) ☐ AM ☒ PM

5. DELIVERY ORDER CEILING AMOUNT *(Obligated Amount)*

$90,000.

6. ACCOUNTING AND APPROPRIATION DATA

Appropriation Number	Document Control No.	Account Number	Object Class
68-20X8145	CK2001	5TFA04DEK2	25.35

7a. ISSUED TO: CONTRACTOR *(Name, Address, and ZIP Code)*

Hazardous Waste Technology Services
5280 Panola Industrial Blvd.
Decatur, GA 30035-4013

8a. ISSUED BY: ORDERING OFFICE *(Name, Address, and ZIP Code)*

U.S. EPA - Region IV
345 Courtland St. NE
Atlanta, GA 30365

7b. PROGRAM MANAGER *(Name and Phone Number)*

Gary Clemons 404 981 9332

8b. EPA REGION/USCG DISTRICT

Region IV

8c. ZONE

2

7c. RESPONSE MANAGER *(Name and Phone Number)*

Tracy Bergquist 404 981 9332

8d. ON-SCENE COORDINATOR *(Name and Phone Number)*

Susan M. Fields 404 881 2216

9. RESPONSE LOCATION *(Site Name and/or Address and ZIP Code)*

Rome Coal Tar Site
102 West SecondnAvenue
Rome, GA 30161

10. CONTRACTOR REQUIRED ON SITE *(Date and Time) (Specify Time Zone)*

May16, 7:00 (Eastern) ☒ AM ☐ PM

11. REQUIRED WORK COMPLETION DATE

May 30, 1985

12. STATEMENT OF WORK

The Contractor shall furnish the necessary personnel, materials, services, facilities, and otherwise do all things necessary for or incident to the performance of the work set forth below:

Removal and disposal of hazardous waste and contaminated soilffrom the coal tar pit onsite. Sampling and analysis of the coal tar waste.

13. ORDERING OFFICER

NAME/TITLE	SIGNATURE	DATE
Sue Fields/ OSC	Sue Fields	5/14/85

IN FOR DISTRIBUTION 85 JUN 10 P2:32 OUT FROM DISTRIBUTION

SUPERFUND DISTRIBUTION

Expiration Date: _____

Transmittal No.: SR-1084-85

1 Finance: Region IV-Shirley Coverson

1 Paying Office (Original) - RTP

1 Contractor (Original) - Mailed by Negotiator

1 Contract File (Original) - Filed by Negotiator

1 Project Officer - Ms. Jean Wright-USEPA Headquarters

1 Deputy Project Officer - (only if stated here): Jan Rogers-EPA Region IV

1 On-Scene Coordinator - (only if stated here): Jim Fields
US EPA Region IV
345 Courtland St., N.E.
Atlanta, Georgia 30365

1 Contract Property - Steven Burke (PM-215)

1 Becky Kennedy (WH-548D)

1 Negotiator - Lynn M. Beasley

1 Linda McKay (PM-214-F)

1 Document Distribution Unit (For filing)

Contract No.: 68-01-6859
Delivery Order No.: 6859-04-064
Modification No.: ONE(1)

Synopsis No.: _____

Contractor's Name and Address:
Hazardous Waste Technology Services, INC.
5280 Panola Industrial Blvd
Decatur, Georgia 30035

Date of distribution: 6/10/85

Person making distribution: Valerie Hurt

Contract file returned to: Lynn M. Beasley

Transmittal No.: SR-1084-85

IO. A00453 DATE 6/6/85 PAGE 2 OF 2

	PERSONNEL	EQUIPMENT	MATERIALS	SUBCONTRACT	DAILY TOTAL
35	596.00	409.00	---------	----------	1005.00
6/85	1708.00	1891.75	288.84	----------	3888.59
7/85	1558.00	1573.00	498.30	----------	3629.30
8/85	2018.00	1573.00	453.80	in dispute 168.00	4212.80
9/85	1624.00	1593.50	475.60	----------	3693.10
20/85	351.00	506.50	------	----------	857.50
TAL	7,855.00	7,546.75	1,716.54	168.00	17,286.29
					- 168.00
					17,118.29

AIT BILLS:

EM WASTE MANAGEMENT	~~48,935.19~~ → 48,604.44	
BBIE WOOD	22,145.60	
SUB TOTAL	~~71,080.79~~ → 70,750.04	
PLUS 5 %	~~3,554.03~~ → 3,537.50	
TAL AWAIT BILLS		~~74,634.82~~ → 74,287.54

JUSTMENTS:

19/85	SILICA SAND	$.30 per 100/LBS X 2	.60	
18/85	MINGE (TERRY BURGE)	SUBCONTRACT PAGE ~~5.00 + 5%~~	~~5.25~~	
TAL UNDERCHARGES			5.85	
TAL ADJUSTMENTS				~~5.85~~ 0.60
TAL INVOICE				~~91,926.96~~ 91,406.43

CLIENT'S

6-83

REORDER FROM: IVAN ALLEN CO.
P. O. BOX 1712
ATLANTA, GA. 30301

(amco gets 4 Ivan allen)

FORM 201

INVOICE

321-85-082

Minge

Terry Burgee
1006 Barker Road, S.W.
Rome, Ga. 30161

DATE May 18 19 85

SOLD TO

Haztech
5280 Panola Industrial Blvd.
Decatur, Ga. 30035

SHIP TO

Weighing trucks

Customer Ord. No.	Our Order No.	Date Shipped	Shipped Via	Terms	Salesman

QUANTITY ordered	QUANTITY shipped	DESCRIPTION	UNIT PRICE	AMOUNT
		Weighed 12 trucks on May 18th @ $ 5.00 each		60 00
		Weighed 10 trucks on May 19th @ $ 5.00 each		60 00
		4½ hours overtime @ $ 10.00 Per hour		45 00
		TOTAL		165 00

ORIGINAL

INVOICE

HAZARDOUS WASTE TECHNOLOGY SERVICES

3300 Marjan Drive
Atlanta, Ga. 30340
Phone (404) 451-9877

Please Mail Remittance to:
P.O. 65278
Charlotte, N.C. 29265
Please return one copy of invoice with payment

YOUR CONTRACT NO.	YOUR ORDER NO.	YOUR JOB NO.	INDIVIDUAL AUTHORIZING WORK	DATE	INVOICE NO.
68-01-6859	6859-04-064		SUE FIELDS	(6) 6/6/85	A00453

MAILING ADDRESS:

INVOICED AND CHARGED TO THE ACCOUNT OF:

EPA, FINANCIAL MANAGEMENT DIVISION
CONTRACTS, FINANCIAL OPERATIONS AND
INFORMATION SECTION (MD 32)
RESEARCH TRIANGLE PARK, NC 27711

Terms: Net 30 Days

OUR DEPT. NO.	OUR JOB NO.	JOB NAME OR SERVICE RENDERED	
321-90,000.00	321-85-082	COAL TAR SITE	ROME, GA

COST SUMMARY:

TOTAL FROM 1900-55 FORMS ---------- ~~$17,286.29~~ 17,118.29 SF
(see exhibit - page 2)

TOTAL AWAIT BILLS ---------- ~~$74,634.82~~ 74,287.54
(see exhibit - page 2)

TOTAL ADJUSTMENTS ---------- $ ~~5.85~~ .60
(see exhibit page 2)

SUB TOTAL ~~$91,926.96~~ 91,406.43

~~AMOUNT IN EXCESS OF CEILING TO BE INVOICED WHEN CEILING IS INCREASED~~ ($ 1,926.96)

TOTAL THIS INVOICE ~~$90,000.00~~ 91,406.43

*** NOTE EPA INVOICE NO IS: 85-082-1

PROJECT MANAGER Gary P. Clemons

Certified as correct, 6/17/85, Sue Fields

CLIENT'S

ROME COAL TAR SITE COST SUMMARY

PERSONNEL	$ 7,855.00	
EQUIPMENT & MATERIALS	$ 9,263.89	
SUBCONTRACTOR	$ 1,349.50	
TRANSPORTATION & DISPOSAL	$ 76,901.99	
TOTAL	$ 95,370.28	$ 95,370.28
CEILING COST	$100,000.00	
COST OF PROJECT	$ 95,370.28	
	$ 4,629.72	
TAT COST:		
LABOR	$ 1,596.00	
TRAVEL/PER DIEM	$ 350.00	
TOTAL	$ 1,946.00	$ 1,946.00

INCIDENT OBLIGATION LOG

(1) Incident Name or Site Number Rome Tar Coal Site

(2) Total Amount Approved $ 90,000.00

(3) Description of Obligation (Vendor Name)	(4) Document Control Number	(5) Date	(6) Amount	(7) Balance
HAZTECH	6859-04-064	5/15	1005.00	88,995.00
		5/16	3888.59	85,106.41
		5/17	3629.30	81,477.11
		5/18	4212.80	77,264.31
		5/19	3693.10	73,571.21
		5/20	857.50	72,713.71
	Increase of $10,000.00	7/15		82,713.71
		7/15	1113.00	81,600.71
				81,600.71
	(Checked by Invoice & On Cost Summary)		T&D:	76,901.99
				4698.72
			Adjustments:	69.00
				4629.72

INVOICE

HAZARDOUS WASTE TECHNOLOGY SERVICES

3300 Marjan Drive
Atlanta, Ga. 30340
Phone (404) 451-9877

Please Mail Remittance to:
P.O. 65278
Charlotte, N.C. 28265
Please return one copy of invoice with payment

YOUR CONTRACT NO.	YOUR ORDER NO.	YOUR JOB NO.	INDIVIDUAL AUTHORIZING WORK	DATE	INVOICE NO.
3-01-6859	6859-04-064		SUE FIELDS	(6) 6/6/85	A00453

MAILING ADDRESS:

INVOICED AND CHARGED TO THE ACCOUNT OF:

EPA, FINANCIAL MANAGEMENT DIVISION
CONTRACTS, FINANCIAL OPERATIONS AND
INFORMATION SECTION (MD 32)
RESEARCH TRIANGLE PARK, NC 27711

Terms: Net 30 Days

YOUR DEPT. NO.	OUR JOB NO.	JOB NAME OR SERVICE RENDERED	
321-90,000.00	321-85-082	COAL TAR SITE	ROME, GA

COST SUMMARY:

TOTAL FROM 1900-55 FORMS (see exhibit - page 2)	$17,286.29
TOTAL AWAIT BILLS (see exhibit - page 2)	$74,634.82
TOTAL ADJUSTMENTS (see exhibit page 2)	$ 5.85
SUB TOTAL	$91,926.96
AMOUNT IN EXCESS OF CEILING TO BE INVOICED WHEN CEILING IS INCREASED	($ 1,926.96)
TOTAL THIS INVOICE	$90,000.00

*** NOTE EPA INVOICE NO IS: 85-082-1

PROJECT MANAGER Gary P. Clemons

CLIENT'S

EXHIBIT TO INVOICE

INVOICE NO. A00453 DATE 6/6/85 PAGE 2 OF 2

DATE	PERSONNEL	EQUIPMENT	MATERIALS	SUBCONTRACT	DAILY TOTAL
/15/85	596.00	409.00	---------	----------	1005.00
5/16/85	1708.00	1891.75	288.84	----------	3888.59
5/17/85	1558.00	1573.00	498.30	----------	3629.30
/18/85	2018.00	1573.00	453.80	168.00	4212.80
5/19/85	1624.00	1593.50	475.60	----------	3693.10
5/20/85	351.00	506.50	------	----------	857.50
TAL	7,855.00	7,546.75	1,716.54	168.00	17,286.29

AWAIT BILLS:

CHEM WASTE MANAGEMENT	48.935.19	
BOBBIE WOOD	22,145.60	
SUB TOTAL	71,080.79	
PLUS 5 %	3,554.03	
TAL AWAIT BILLS		74,634.82

ADJUSTMENTS:

5/19/85	SILICA SAND	$.30 per 100/LBS X 2	.60	
5/18/85	MINGE (TERRY BURGE)	SUBCONTRACT PAGE 5.00 + 5%	5.25	
TOTAL UNDERCHARGES			5.85	
TAL ADJUSTMENTS				5.85
TAL INVOICE				91,926.96

CLIENT'S

INVOICE

HAZARDOUS WASTE TECHNOLOGY SERVICES

3300 Marjan Drive
Atlanta, Ga. 30340
Phone (404) 451-9877

Please Mail Remittance to:
P.O. 65278
Charlotte, N.C. 28265
Please return one copy of invoice with payment

YOUR CONTRACT NO.	YOUR ORDER NO.	YOUR JOB NO.	INDIVIDUAL AUTHORIZING WORK	(8) DATE	INVOICE NO.
68-01-6859	6859-04-064		Fred B. Stroud	7/29/85	A00501

MAILING ADDRESS:

INVOICED AND CHARGED TO THE ACCOUNT OF:

EPA, Financial Management Division
Contracts, Financial Operations and
Information Section (MD-32)
Research Triangle Park, NC 27711

Terms: Net 30 Days

OUR DEPT. NO.	OUR JOB NO.	JOB NAME OR SERVICE RENDERED	
321-5,370.28	321-85-082	Coal Tar Site	Rome, Georgia

Cost Summary:

Total From 1900-55 Forms----------$1,263.00
(see exhibit-page 2)

Total Await Bills---------- 2,117.17
(see exhibit-page 2)

Total Adjustments---------- 63.15
(see exhibit-page 2)

Total Amount in excess of ceiling on
Invoice #00435 EPA #85-082-1---------- 1,926.96
(see exhibit-page 2)

Total Invoice $5,370.28

**** Note EPA Invoice No. is 85-082-2

? Project Manager Gary P. Glenn

CLIENT'S

EXHIBIT TO INVOICE

INVOICE NO. _____ DATE 7/29/85 PAGE 2 OF 2

Date	Personnel	Equipment	Material	Subcontractor	Daily total
7/15/85	---	---	----	1263.00	1263.00
7/15/85	(Less Chem-Waste)			(-150.00)	
Total 1900-55 Forms --		---	----	1263.00	1263.00

Await Bills

5/18	Chem Waste Management	1753.30
	Less $150.00 (Ref 7/15/85)	- 150.00
5/17	Romac Materials Hauled by Robbie Wood Omitted from 1900-55's	413.05
		2016.35
	5% Markup	100.82
	Total Await Bills	2117.17

Adjustments

Undercharges

7/15	5% Mark-up on Advanced Analytical Labs	63.15
	Total Adjustments	63.15
	Amount in Excess of ceiling on Invoice #00435 EPA # 85-082-1	1926.96
	TOTAL INVOICE	$5370.28

CLIENT'S

PERSONNEL ENTRY AND EXIT LOG

Work Site: Rome Coal Tar Site
Date: 5/19/85

Time In	Time Out	Name	Representing
0800	1230	S. Fiezos	EPA
	1230	C. Burton	TAT
	1230	T. Bergquist	Hazlech
	1530	L. Malcom	"
	1230	D. Thorton	CMC
	1230	J. Coerman	CMC
1000	1030	C. Goosey	GA EPD
1030	1530	W. Thompson	Hazlech

PERSONNEL ENTRY AND EXIT LOG

Work Site: Rome Coal Tar Site
Date: May 18, 1988

Time In	Time Out	Name	Representing
0800	1630	Sue Fizos	EPA
		Jim Kilgton	TAT
		Tracy Bergquist	HAZTECH
		Wayman Thompson	"
		Jim Malcom	"
		D. Thorton	CMC
		J. Corman	CMC
1030	1045	C. Goodly	GA EPD

PERSONNEL ENTRY AND EXIT LOG

Work Site: Rome Coal Tar Site
Date: May [illegible], 1986

Time		Name	Representing
In	Out		
0730	1500	T. Bergquist	Haztech
↓	1500	N. Thompson	"
↓	1500	L. Malcom	"
↓	1600	D. Thorton	CMC
↓	1600	J. Coeman	CMC
↓	1600	S. Fezos	EPA
↓	1600	C. Burton	TAT
1115	1245	Claude Goody	GA EPD
1430	1600	" "	"

PERSONNEL ENTRY AND EXIT LOG

Work Site: Rose Coal Tar Pit
Date: May 16, 1985

Time In	Time Out	Name	Representing
0800	1800	Sue Fields	EPA
0800	1800	Lisa Burton	TAT
0800	1800	Tracy Bergquist	HayTech
0830	1430	Claude Goodly	EPD
0845	1430	Spider Monkey	Robbie Woods
0845	1430	Buckwheat	Robbie Woods
0900	1800	Jackie Corman	CMC
0900	1030	Wilbur Sherrow	CMC
0900	1130	Rickie	CMC
0900	1500	Waymon Thompson	HayTech
1100	1500	Lon Malcolm	HayTech
1200	1517	Clay Corman	CMC
1200	1800	Dewey Thorton	CMC

PERSONNEL ENTRY AND EXIT LOG

Work Site: Rome Coal Tar Site
Date: May 15, 1985

Time In	Time Out	Name	Representing
1500	1600	Tracy Bergquist	HazTech
1530	1700	Sue Fields	EPA
1530	1700	Lisa Burton	TAT

Chemical Waste Management, Inc.
Emelle Facility
P.O. Box 55
Emelle, Alabama 35459
205/652-9531
Telex: 782252

May 29, 1985

U.S. EPA
345 Courtland Street
Atlanta, Georgia 30365

RE: Alabama Manifest # 196936 Rome Coal Tar Site

Gentlemen:

On 5-17, a load arrived at our facility with the following related weight discrepancy:

Incorrect weight listed on above referenced manifest. On future shipments, please list correct weight. Change was authorized per telecon. Thank you.

Required information for Alabama manifests can be found in the Code of Federal Regulations (CFR 40, Section 262.21). Generators are required to submit the total quantity of each hazardous material by units of weight or volume on the Alabama manifests for bulk shipments. We prefer a weight to be listed due to our requirements dealing with manifest discrepancies (refer to CFR 40, Section 264.72). As disposer, we are required to reconcile weight variations greater than 10% for bulk shipments on Alabama manifests.

All shipments received at this facility must be accompanied by a completed Alabama manifest(s), listing all required information.

Per our telephone conversation on 5-20, the above referenced discrepancy has been resolved by telecon authorization.

Should you have any questions, please call me. We appreciate your help and business.

Sincerely,

CHEMICAL WASTE MANAGEMENT, INC.

Sharon Permenter

Sharon Permenter
Discrepancy Clerk

cc: Jay Kaplan

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

49032

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA 3680090005 Manifest Document No. 100030

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND ST
ATLANTA GA 30365

4. Generator's Phone (404) 8813931

A. State Manifest Document Number CWMA 166279

B. State Generator's ID

5. Transporter 1 Company Name ROBBIE D. WOOD

6. US EPA ID Number ALD067138891

C. State Transporter's ID

D. Transporter's Phone 205 744 8440

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID NOS ORM E NA9189 CWM Profile Number OSAE66501	1	DT	48400	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THERE NO ABSORBANT WAS ADDED TO THE ABOVE WASTE THAT WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004 (C)(1). TRAILER # 1515

K. Handling Codes for Wastes Listed Above
a. D81
b.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date (Month Day Year)
Sue Fields	Sue Fields for the CWM Administrator	05 19 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
Ken Gunter	Ken Gunter	05 19 85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date (Month Day Year)
Greg Green		5 20 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. 100021

2. Page 1 of [illegible] Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document Number CWMA 175703

B. State Generator's ID

4. Generator's Phone ( )

5. Transporter 1 Company Name [illegible] 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone [illegible]

7. Transporter 2 Company Name 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number			[illegible]		
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

THIS IS TO CERTIFY THAT NONHAZARDOUS WASTE WAS ADDED TO THE TANK WHERE [illegible] WASTE [illegible] THE [illegible] NONHAZARDOUS [illegible] 1342 (LM3)

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

Generator Copy 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No.

2. Page 1 of

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: CWMA 166282

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.O.O.O.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

TRAILER # 0031

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

EPA Form 8700-22A (3-84)

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No.

2. Page 1 of

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number
CWMA 175704

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A L D 0 0 0 6 2 2 4 6 4

G. State Facility's ID

H. Facility's Phone
205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

THIS IS TO CERTIFY THAT NO HAZARDOUS WASTE TO THE MOST WASTE WHICH WOULD [illegible] CONTAMINATED [illegible]
TRUCK # 503

K. Handling Codes for Wastes Listed Above

a. c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] | Manifest Document No. 23 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: CWMA 166281

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone [illegible]

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

[illegible] THAT NO ABSORBANT WAS [illegible] ABOVE [illegible] WOULD PROHIBIT [illegible] SECTION 3004(d)(1).

TRAILER # 507

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22A (3-84)

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address [illegible]

4. Generator's Phone ([illegible])

A. State Manifest Document Number CWMA 175705

B. State Generator's ID

5. Transporter 1 Company Name [illegible]

6. US EPA ID Number [illegible]

C. State Transporter's ID

D. Transporter's Phone [illegible]

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number			[illegible]		
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION [illegible] [illegible] #[illegible]

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number CWMA 175706

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(d)

K. Handling Codes for Wastes Listed Above

a. b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. 000[illegible]
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
[illegible]
4. Generator's Phone ([illegible])

A. [illegible] Number CWMA 175707
B. State Generator's ID

5. Transporter 1 Company Name [illegible]
6. US EPA ID Number [illegible]
C. State Transporter's ID
D. Transporter's Phone 205 744 8440

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4
G. State Facility's ID
H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THAT NO ABSURBANT HAS BEEN ADDED TO THE ABOVE WASTE THAT WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(c)(1).
TIME #5B

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name [illegible] | Signature [illegible] | Date Month Day Year

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 00028 Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ([illegible])

A. [illegible] Number [illegible] 196948

B. State Generator's ID

5. Transporter 1 Company Name — 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name — 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address — 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above — This is to certify that [illegible] has been added to the [illegible] above waste which would prohibit it's being [illegible] per RCRA section 3004(c)(1). TRAILER [illegible]

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name — Signature — Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name — Signature — Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name — Signature — Date Month Day Year

GENERATOR — TRANSPORTER — FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] | Manifest Document No. [illegible] | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address [illegible]

4. Generator's Phone ( ) [illegible]

5. Transporter 1 Company Name | 6. US EPA ID Number [illegible] | C. State Transporter's ID | D. Transporter's Phone 205-[illegible]

7. Transporter 2 Company Name | 8. US EPA ID Number | E. State Transporter's ID | F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number | G. State Facility's ID | H. Facility's Phone 205/652-4721

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.O.O.O.6.2.2.4.6.4

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number [illegible]	1	[illegible]	1	[illegible]	[illegible]
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

THIS [illegible] WAS ADDED TO THE ABOVE [illegible] PROPERLY TRACKING [illegible] PER SECTION 3004(C)(3). TRAN. #511

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
	[illegible]	[illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
ERNEST W. STREET	[illegible]	5 / 12 / [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22A (3-84)

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address [illegible]

4. Generator's Phone ( ) [illegible]

5. Transporter 1 Company Name [illegible]
6. US EPA ID Number [illegible]

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

[illegible] 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions [illegible]
THIS IS TO [illegible] ADDED TO THE ABOVE WASTE [illegible] PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004 (c)(1). TEMP. #515

[illegible] Listed Above
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
[illegible]	[illegible]	

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
[illegible]	[illegible]	[illegible]

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management) 19033

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 100021

2. Page 1 of

Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number CWMA 175703

B. State Generator's ID

3. Generator's Name and Mailing Address
US EPA
345 COURTLAND STREET
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

5. Transporter 1 Company Name ROBBIE D. WOOD

6. US EPA ID Number ALD067138891

C. State Transporter's ID

D. Transporter's Phone 205 744 8440

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	41900 ~~74800~~	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(c)(1).
TRAILER # 1342 (LM3)

K. Handling Codes for Wastes Listed Above
a. 081
b.
c.
d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA Administrator
Date: Month Day Year 5 1 9 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Loyd Hogland
Signature: Loyd Hogland
Date: Month Day Year 5 1 9 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Chas. Green
Signature:
Date: Month Day Year 5 1 29 85

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

49021

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: GA3680090005 — Manifest Document No.: 100023
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
U.S. EPA
345 COURTLAND ST
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

5. Transporter 1 Company Name: ROBBIE D. WOOD
6. US EPA ID Number: ALD067138891

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address:
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

[illegible] Document Number: [illegible] 166281
[illegible]
C. State Transporter's ID
D. Transporter's Phone: 205-744-8440
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 — CWM Profile Number OSAE66901	1	DT	43680	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional [illegible]
THIS [illegible] ABSORBANT WAS ADDED TO THE [illegible] WASTE [illegible] WOULD PROHIBIT IT [illegible] LANDFILLED PER RCRA SECTION 3004(c)(1).
TRAILER# 507

K. Handling Codes for Wastes Listed Above
a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
Sue Fields	Sue Fields for the EPA Administrator	05 19 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
LARRY WITT	Larry Witt	5 19 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year
Greg Green	Greg Green	5 20 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

49024

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 100022
2. Page 1 of
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND ST
ATLANTA GA 30365

A. State Manifest Document Number [illegible] 166282
B. State Generator's ID

4. Generator's Phone (404) 881-3931

5. Transporter 1 Company Name: ROBBIE D. WOOD
6. US EPA ID Number: ALD067138891
C. State Transporter's ID
D. Transporter's Phone 205 714 8440

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4
G. State Facility's ID
H. Facility's Phone 205/652-9721

5/20

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	39740	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions
THIS IS [illegible] PRESERVANT WAS ADDED TO [illegible] BRAMGET [illegible] 264(c)(1) RCRA [illegible] TRANSPORTER 0031

K. Handling Codes for Wastes Listed Above
a. D001
b.
c.
d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for EPA Administrator
Date: Month 05 Day 19 Year 85

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: JOEY WILSON
Signature: Joey Wilson LMI
Date: Month 5 Day 19 Year 85

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

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: GREG REEN
Signature
Date: Month 5 Day 20 Year 85

EPA Form 8700-22A (3-84) GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: GA3680090005 — Manifest Document No.: 100024
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: U.S. EPA, 345 COURTLAND ST, ATLANTA GA 30365
4. Generator's Phone: (404) 881-3931

A. State Manifest Document Number: CWMA 175704
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: 205-744-8440

5. Transporter 1 Company Name: ROBBIE D. WOOD
6. US EPA ID Number: ALD0671 38891

7. Transporter 2 Company Name:
8. US EPA ID Number:

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

9. Designated Facility Name and Site Address: CHEMICAL WASTE MANAGEMENT, INC., Emelle Facility, Alabama Highway 17 at Mile Marker 163, Emelle, Alabama 35459
10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID:
H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. HAZARDOUS WASTE SOLID N.O.S., ORM-E, NA9189 — CWM Profile Number: OSAE66901	1	DT	43100	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(c)(1) Trailer # 503

K. Handling Codes for Wastes Listed Above: a. D81 c.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month	Day	Year
Sue Fields	Sue Fields for the EPA Administrator	05	19	85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
WAYNE ELMER KOSSER	Wayne Elmer Kosser	5	19	85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month	Day	Year
Greg Green	[signature]	5	20	85

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

49039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA 368 009 000 5 100025 — Manifest Document No.

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND STREET
ATLANTA GA 30365

4. Generator's Phone (404) 881-3531

A. State Manifest Document Number: CWMA 175705

B. State Generator's ID

5. Transporter 1 Company Name: ROBBIE D. WOOD

6. US EPA ID Number: ALD067138891

C. State Transporter's ID

D. Transporter's Phone: 205 744 9440

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID N.O.S. ORM E, NA9189 — CWM Profile Number DSAE(690)	1	DT	44340	P	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE MATERIAL WHICH WOULD PREVENT IT BEING LANDFILLED PER RCRA SECTION 3004 (d)(1)

K. Handling Codes for Wastes Listed Above
a. D81 b. c.

15. Special Handling Instructions and Additional Information

GENERATOR

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields — Signature: Sue Fields for the EPA Administrator — Date: Month 05 Day 19 Year 85

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: [illegible] — Signature: [illegible] — Date: Month 5 Day 19 Year [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: GREG GREEN — Signature: [illegible] — Date: Month 5 Day 29 Year 85

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management) 49040

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No 2009-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA368009 0005 Manifest Document No. 100026
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND ST
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

A. State Manifest Document Number CWMA 175708

B. State Generator's ID

5. Transporter 1 Company Name ROBBIE D. WOOD
6. US EPA ID Number ALD067138891

C. State Transporter's ID

D. Transporter's Phone 205 744 8440

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	41440	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(c)(1)
Trailer #508

K. Handling Codes for Wastes Listed Above
a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
Sue Fields	Sue Fields for the EPA Administrator	5 19 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
GERALD CAFFEE	Gerald K Caffee	5 19 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year
Greg Green	[signature]	5 20 85

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

49023

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 000027

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND ST
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

A. State Manifest Document Number CWMA 175707

B. State Generator's ID

5. Transporter 1 Company Name ROBBIE D. WOOD

6. US EPA ID Number ALD067138891

C. State Transporter's ID

D. Transporter's Phone 205 744 8440

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S. ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	48040	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THAT NO ABSORBANT HAS BEEN ADDED TO THE ABOVE WASTE THAT WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(d).
Tank #513

K. Handling Codes for Wastes Listed Above
a. D81 b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA Administrator
Date: Month 05 Day 19 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Gerald T Swann
Signature: Gerald T Swann
Date: Month 5 Day 19 Year 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Greg Green
Signature:
Date: Month 5 Day 20 Year 85

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 000012
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND STREET
ATLANTA GA 30365

A. State Manifest Document Number CWMA 196946
B. State Generator's ID

4. Generator's Phone (404) 881-3931

5. Transporter 1 Company Name: ROBBIE D. WOOD
6. US EPA ID Number: ALD067138891
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: A.L.D.O.O.O.6.2.2.4.6.4
G. State Facility's ID
H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	44260	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE WASTE THAT WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004 (c)(1).
TRAILER # 0817

K. Handling Codes for Wastes Listed Above
a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
Sue Fields	Sue Fields for the EPA Administrator	05 18 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
Hal Hure	Hal Hure	5 18 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Date Month Day Year
Greg Green	Greg Green	5 20 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

49058

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA 3680090005 Manifest Document No. 00013
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
345 Courtland St NE Atlanta GA 30365

A. State Manifest Document Number CWMA 196947

B. State Generator's ID

4. Generator's Phone (404) 881-2216

5. Transporter 1 Company Name: Robbie D. Wood
6. US EPA ID Number: AL D 067138891

C. State Transporter's ID

D. Transporter's Phone 205 344 8140

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: A L D 0 0 0 6 2 2 4 6 4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid N.O.S. ORM-E NA 9189 CWM Profile Number OSAE 66901	1	DT	48820	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that no absorbent has been added to the above waste which would prohibit it's being landfilled per RCRA Section 3004 (c)(1). TRAILER # 514

K. Handling Codes for Wastes Listed Above
a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA administrator
Date: Month 05 Day 11 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Donald E. Watson
Signature: Donald E. Watson
Date: Month 5 Day 18 Year 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: L R Watt
Signature: L R Watt
Date: Month 5 Day 20 Year 85

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22 (3-84) GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

49063

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA368009005 Manifest Document No. 000014

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
345 Courtland St NE Atlanta, GA 30365

4. Generator's Phone (404) 881-2216

A. State Manifest Document Number [redacted] 196949

B. State Generator's ID

5. Transporter 1 Company Name: Robbie D. Wood

6. US EPA ID Number: ALD067138891

C. State Transporter's ID

D. Transporter's Phone 205 744 8440

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: ALD000622464

G. State Facility's ID

H. Facility's Phone [redacted]

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid N.O.S. ORM-E NA 9189 CWM Profile Number OSAE 66901	1	DT	41850	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that no absorbent material has been added to the above waste which would prohibit it's being landfilled per RCRA section 3004 (c)(1) TRAILER # [redacted]0365

K. Handling Codes for Wastes Listed Above
a. D81
b.
c.
d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA Administrator
Date: Month Day Year 05 18 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: STEVE PENNINGTON
Signature: Steve Pennington
Date: Month Day Year 05 18 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: LRWatt
Signature: LRWatt
Date: Month Day Year 5 20 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management) 49062

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA368009005 Manifest Document No. 00015
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
345 Courtland St NE Atlanta GA 30365

4. Generator's Phone (404) 881 2216

5. Transporter 1 Company Name: Robbie D. Wood
6. US EPA ID Number: ALD067138841

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: ALD006224644

A. State Manifest Document Number: 196950
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone: 205 744 8440
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID: 42100
H. Facility's Phone: [illegible]

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	State Waste No.
a. Hazardous Waste Solid NOS ORM-E NA 9189 — CWM Profile Number OAE 66901	1	DT	42020	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that no absorbent material has been added to the above waste which would prohibit its being landfilled per RCRA section 3004(c)(1). TRAILER # 505

K. Handling Codes for Wastes Listed Above
a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA Administrator
Date (Month Day Year): 05 / 08 / 85

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: PETE MALCOM
Signature: [illegible]
Date (Month Day Year): 5 / 8 / 85

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

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: LR WATT
Signature: [illegible]
Date (Month Day Year): 5 20 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

4 90 10

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 00016
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
345 Courtland St NE Atlanta, GA 30365

4. Generator's Phone (404) 881 2216

A. State Manifest Document Number CWMA 196952

B. State Generator's ID

5. Transporter 1 Company Name: Robbie D. Wood
6. US EPA ID Number: ALD067138891

C. State Transporter's ID

D. Transporter's Phone 205 749 8440

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: ALD000622464

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. Hazardous Waste Solid N.O.S. ORM-E NA 9189 CWM Profile Number OSAE 66901	1	DT	43200	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that no absorbent material has been added to the above waste which would prohibit it's being landfilled per RCRA Section 3004 (c)(1). DT TRAILER # 0051

K. Handling Codes for Wastes Listed Above
a. D&I
b.
c.
d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA Administrator
Date: Month 05 Day 18 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Tommy Hyde
Signature: Tommy Hyde
Date: Month 5 Day 18 Year 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Campbell
Signature
Date: Month 5 Day 20 Year 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. G A 3 6 8 0 0 9 0 0 0 5 — Manifest Document No. 2 0 0 1 9

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
345 Courtland St NE Atlanta GA 30365

A. State Manifest Document Number CWMA 196954

B. State Generator's ID

4. Generator's Phone (404) 881 2216

5. Transporter 1 Company Name: Robbie D Wood

6. US EPA ID Number: A L D 0 6 7 1 3 8 9 1

C. State Transporter's ID

D. Transporter's Phone 205 749-8840

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A L D 0 0 0 6 2 2 4 6 4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. Hazardous Waste Solid N.O.S. ORM-E NA 9189 CWM Profile Number OSAF 66901	1	DT	2000	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that no absorbent material has been added to the above waste which would prohibit its being landfilled per RCRA Section 3004(c)(1). TRAILER #317

K. Handling Codes for Wastes Listed Above: a. D81 b. c. d.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields — Signature: Sue Fields for the EPA Administrator — Date: Month 05 Day 18 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Ken Standridge — Signature: Ken Standridge — Date: Month 5 Day 18 Year 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: S Campbell — Signature — Date: Month 5 Day 20 Year 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management) 49037

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 00020
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
345 Courtland St NE Atlanta GA 30365

4. Generator's Phone (404) 881 2216

A. State Manifest Document Number CWMA 196955
B. State Generator's ID

5. Transporter 1 Company Name: Robbie D Wood
6. US EPA ID Number: A.L.D.0.6.7.1.3.8.9.1
C. State Transporter's ID
D. Transporter's Phone 205 744-2440

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4
G. State Facility's ID
H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. Hazardous Waste Solid N.O.S. OR M-E NA 9189 CWM Profile Number OSAE 66901	1	DT	42820	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that no absorbent material has been added to the above waste which would prohibit it's being landfilled per RCRA Section 3004 (d)(1). TRAILER #510

K. Handling Codes for Wastes Listed Above
a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for EPA Administrator
Date: Month 05 Day 18 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Eddie Thomas
Signature: Eddie Thomas
Date: Month 5 Day 18 Year 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Greg Green
Signature
Date: Month 5 Day 20 Year 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: CWMA 196945

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone: 205-744-8440

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE WASTE THAT WOULD PROHIBIT IT LEAVING LANDFILL [illegible] FOR A SECTION [illegible]. [illegible] TRAIL [illegible] 0024

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address [illegible]

4. Generator's Phone ([illegible])

A. State Manifest Document Number CWMA 196946

B. State Generator's ID

5. Transporter 1 Company Name [illegible]
6. US EPA ID Number [illegible]

C. State Transporter's ID

D. Transporter's Phone [illegible]

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number [illegible]					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

THIS IS TO CERTIFY THAT NO ABSORBANT HAS ADDED TO THE [illegible] WASTE THAT WOULD PROHIBIT IT BEING CERTIFIED PER RCRA SECTION [illegible].

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
[illegible]	[illegible]	[illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: CWMA 196947

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone 205 349 5990

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number	1	[illegible]	[illegible]		
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that no [illegible] has been added to the above [illegible] which would prohibit its [illegible] per RCRA [illegible] (CXV). TRAILER # 514

K. Handling Codes for Wastes Listed Above: a. c. b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document Number: CWMA 196949

B. State Generator's ID

4. Generator's Phone ( )

5. Transporter 1 Company Name — 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone 205 744 8440

7. Transporter 2 Company Name — 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address — 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number			41		
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is [illegible] waste which could prohibit it's being [illegible] per RCRA section 3004 (c)(1) TRAILER # [illegible]

K. Handling Codes for Wastes Listed Above: a. c. b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name — Signature — Date (Month Day Year)

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: [illegible] — Signature: [illegible] — Date (Month Day Year)

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name — Signature — Date (Month Day Year)

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

Manifest Document Number 196950

B. State Generator's ID

4. Generator's Phone ( )

5. Transporter 1 Company Name

6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to advise that Absorbent Material has been added to the waste which was on the manifest on 1/9 for RMA testing 4(d)(1). TRAILER # [illegible]

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name | Signature | Date Month Day Year

Generator Nt. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: CWMA 196952

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone 205 [illegible]

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.O.O.O.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

[illegible] which would prohibit [illegible] Section 3004 (c)(1). [illegible] RCRA TRAILER # 0051

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: CWMA 196951

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone 205 [illegible]

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone [illegible]

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

[illegible] 3004 (c)(1). This [illegible] has been added to the above waste [illegible] TRAILER # [illegible]

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: CWMA 196953

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.O.O.O.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: a. b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Generator Int. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document Number: CWMA 196954

B. State Generator's ID

4. Generator's Phone ( )

5. Transporter 1 Company Name | 6. US EPA ID Number | C. State Transporter's ID | D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number | E. State Transporter's ID | F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number | G. State Facility's ID

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

H. Facility's Phone: 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: a. b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document Number: CWMA 196955

B. State Generator's ID

4. Generator's Phone ( )

5. Transporter 1 Company Name | 6. US EPA ID Number | C. State Transporter's ID | D. Transporter's Phone 205 744 3440

7. Transporter 2 Company Name | 8. US EPA ID Number | E. State Transporter's ID | F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number | G. State Facility's ID

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.O.O.O.6.2.2.4.6.4

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number			2		
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

TRAILER #510

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Continue No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA368009000 5 Manifest Document No. 100003
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND STREET
ATLANTA, GA 30365

A. State Manifest Document Number CWMA 196935
B. State Generator's ID

4. Generator's Phone (404) 881-2217

5. Transporter 1 Company Name: ROBBIE D. WOODS
6. US EPA ID Number: ALD067138891
C. State Transporter's ID
D. Transporter's Phone 205-[illegible]-8040

7. Transporter 2 Company Name
8. US EPA ID Number
E. Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: A.L.D.O.O.O.6.2.2.4.6.4
G. State Facility's ID
H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 CWM Profile Number OHE66901	1	DT	42250	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
This is to certify that no absorbent has been added to the above waste which would prohibit it's being landfilled
TRAILER # 508
per RCRA section 3004 (c)(1) Sue Fields for the EPA Administrator

K. Handling Codes for Wastes Listed Above
a. D01 c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA Administrator
Date: Month 05 Day 17 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: GERALD CAFFEE
Signature: Gerald R Caffee
Date: Month 05 Day 17 Year 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: S. CAMPBELL
Signature
Date: Month 5 Day 17 Year 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management) 515

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: GA368009000 Manifest Document No.: 100004
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: U.S. EPA, 345 COURTLAND STREET, ATLANTA GA 30365
4. Generator's Phone: (404) 881-3931

A. State Manifest Document Number: CWMA 196936
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: 205-[illegible]
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: 205/652-9721

5. Transporter 1 Company Name: ROBBIE D. WOODS
6. US EPA ID Number: ALD067138891
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility, Alabama Highway 17 at Mile Marker 163, Emelle, Alabama 35459
10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S. ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	47000 ~~78880~~	LB	
b. CWM Profile Number			5/20/85 Alw		
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: TRAILER # — THIS IS TO CERTIFY THAT NO AGGREGANT HAS BEEN ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(c)(1).

K. Handling Codes for Wastes Listed Above: a. D81 b. c. d.

15. Special Handling Instructions and Additional Information: Sue Fields for the EPA Administrator

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
Sue Fields	Sue Fields for the EPA Administrator	05 17 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
Ken Gunter	Ken Gunter	5 17 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year
S Campbell	[signature]	5 17 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 66005

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND STREET
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

A. State Manifest Document Number CWM 196937

B. State Generator's ID

5. Transporter 1 Company Name: ROBBIE D. WOODS

6. US EPA ID Number: ALD067138891

C. State Transporter's ID

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: ALD006224644

E. State Facility's ID

F. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S. ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	40270	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
TRAILER # 511
THIS IS TO CERTIFY THAT NO ABSORBANT HAS BEEN ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(c).
Sue Fields for the EPA Administrator

K. Handling Codes for Wastes Listed Above
a. D81 b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA Administrator
Date (Month Day Year): 05 17 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: ERNEST W. STREET
Signature: Ernest W. Street
Date (Month Day Year): 5 17 85

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date (Month Day Year):

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: J CAMPBELL
Signature:
Date (Month Day Year): 5 17 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 00006
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND ST
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

5. Transporter 1 Company Name: ROBBIE D. WOOD
6. US EPA ID Number: ALD067138891

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	45180	B	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: TRAILER 513 — This is to certify that no absorbent has been added to the above waste which would prohibit its being landfilled per RCRA Section 3004(c)(1). Sue Fields for the EPA Administrator

K. Handling Codes for Wastes Listed Above: a. D81 b. c. d.

15. Special Handling Instructions and Additional Information

116-138

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields — Signature: Sue Fields for the EPA Administrator — Date: Month 05 Day 17 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Gerald T Swann — Signature: Gerald T Swann — Date: Month 5 Day 17 Year 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: S Campbell — Signature — Date: Month 5 Day 17 Year 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management) 307

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: GA368009000 — Manifest Document No.: 60007
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: U.S. EPA, 345 COURTLAND ST, ATLANTA GA 30365
4. Generator's Phone: (404) 881-3931
A. State Manifest Document Number: [illegible] 198939
B. State Generator's ID:
5. Transporter 1 Company Name: ROBBIE D. WOOD
6. US EPA ID Number: ALD067138891
C. State Transporter's ID:
D. Transporter's Phone: 205-744-8440
7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:
9. Designated Facility Name and Site Address: CHEMICAL WASTE MANAGEMENT, INC., Emelle Facility, Alabama Highway 17 at Mile Marker 163, Emelle, Alabama 35459
10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4
G. State Facility's ID:
H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	38520	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: TRAILER # 507 — THIS IS TO CERTIFY THAT NO ABSORBANT HAS BEEN ADDED TO THE ABOVE WASTE WHICH PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(c)(1) Sue Fields for the EPA Administrator

K. Handling Codes for Wastes Listed Above: a. D81 b. c. d.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
Sue Fields	Sue Fields for the EPA Administrator	05 17 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
LARRY WITT	Larry Witt	5 17 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
		5 17

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year
S CAMPbell	[signature]	5 17 85

GENERATOR — TRANSPORTER — FACILITY

EPA Form 8700-22 (3-84) GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 00008
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
345 Courtland St NE
Atlanta, GA 30365

4. Generator's Phone (404) 881-3931

A. State Manifest Document Number CWMA 196940
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone 205 744-8946
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone 205/652-9721

5. Transporter 1 Company Name: Robbie D. Wood
6. US EPA ID Number: ALD067138891
7. Transporter 2 Company Name
8. US EPA ID Number
9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: ALD000622464

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid, N.O.S. ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	4720	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that no absorbent has been added to the above waste which would prohibit it being land filled per RCRA Section 3004(c)(1). Sue Fields for the EPA Administrator
TRAILER # 909

K. Handling Codes for Wastes Listed Above
a. D81 b. c. d.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields
Signature: Sue Fields for the EPA Administrator
Date: Month 5 Day 12 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Pat Gunter
Signature: Pat Gunter
Date: Month 5 Day 12 Year 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: S Campbell
Signature
Date: Month 5 Day 17 Year 85

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management) 510

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA368009000510000 Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND STREET
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

A. [illegible] Document Number [illegible]
B. State Generator's ID

5. Transporter 1 Company Name: ROBBIE D. WOODS
6. US EPA ID Number: ALD067738891
C. State Transporter's ID
D. Transporter's Phone: 205 [illegible]

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4
G. State Facility's ID: 75640 P
H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S. ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	43660	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number 66941					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THAT NO ABSORBANT HAS BEEN ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER SECTION 3004(c)(1) RCRA. Sue Field for the EPA Administrator TRAILER # 510

K. Handling Codes for Wastes Listed Above
a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
Sue Field	Sue Field for the EPA Administrator	05 17 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
Eddie Thomas	Eddie Thomas	5 17 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year
S Campbell	[signature]	5 17 85

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22 (3-84) GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA368009000 Manifest Document No. 100010
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND STREET
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

A. State Manifest Document Number CWMA 196942

B. State Generator's ID

5. Transporter 1 Company Name ROBBIE D. WOODS

6. US EPA ID Number ALD0671 38891

C. State Transporter's ID

D. Transporter's Phone 205-744-8440

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORME, NA9189 CWM Profile Number OSAE66901	1	DT	44,920	LB	
b. CWM Profile Number					
c. CWM Profile Number 142					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
THIS IS TO CERTIFY THAT NO ABSORBANT WAS ADDED TO THE ABOVE WASTE THAT WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(c)(1).

K. Handling Codes for Wastes Listed Above
a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information
TRAILER #512

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
Sue Fields	Sue Fields for the EPA Administrator	05 12 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
LARRY Johnson	Larry Johnson	5 12 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year
S Campbell	[signature]	5 12 85

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22 (3-84) GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address [illegible]

4. Generator's Phone ([illegible])

A. State Manifest Document Number: CWMA 196935

B. State Generator's ID

5. Transporter 1 Company Name [illegible]
6. US EPA ID Number [illegible]

C. State Transporter's ID

D. Transporter's Phone 205-344-[illegible]

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

This is to certify that the absorbent has been added to [illegible] TRAILER # 508 [illegible] 3004 [illegible]

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name [illegible] | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR — TRANSPORTER — FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address [illegible]

4. Generator's Phone ([illegible])

A. State Manifest Document Number [illegible] 196936

B. State Generator's ID

5. Transporter 1 Company Name [illegible]

6. US EPA ID Number [illegible]

C. State Transporter's ID

D. Transporter's Phone 205-744-844

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number [illegible]	1	TST	78880	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

TRAILER

THIS IS TO CERTIFY THAT NO [illegible] BEEN ADDED TO THE ABOVE [illegible] WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(C)(1).

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
[illegible]	[illegible]	[illegible]

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address [illegible]

A. State Manifest Document Number CWMA 196937

B. State Generator's ID

4. Generator's Phone ([illegible])

5. Transporter 1 Company Name [illegible]
6. US EPA ID Number [illegible]
C. State Transporter's ID
D. Transporter's Phone [illegible]

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number A.L.D.0.0.0.6.2.2.4.6.4
G. State Facility's ID
H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
TRAILER # 511
THIS IS TO CERTIFY THAT NO ACCELERANT HAS BEEN ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(X).

K. Handling Codes for Wastes Listed Above
a. c.
b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: ERNEST W. STAFFET | Signature | Date Month Day Year

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Continued No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone

A. State Manifest Document Number: CWMA 196938

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone: 205 791 844

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: TRAILER

K. Handling Codes for Wastes Listed Above: a. b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date (Month Day Year)

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date (Month Day Year)

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22 (3-84) Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
[illegible]

4. Generator's Phone [illegible]

A. State Manifest Document Number: CWMA 196939

B. State Generator's ID

5. Transporter 1 Company Name: [illegible]
6. US EPA ID Number: [illegible]

C. State Transporter's ID

D. Transporter's Phone: [illegible]

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: TRAILER #[illegible] THIS IS TO CERTIFY THAT NO ABSORBANT HAS BEEN ADDED TO THE ABOVE WASTE WHICH PROHIBITS IT BEING LAND [illegible]

K. Handling Codes for Wastes Listed Above: a. c. b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
[illegible]	[illegible]	[illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22 (3-84) Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document Number: CWMA 196940

B. State Generator's ID

4. Generator's Phone ( )

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter 1 Phone 205 [illegible]

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter 2 Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.O.O.O.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: This is to certify that an absorbent has been added to the above waste which would prohibit it being landfilled per [illegible] section 300.[illegible] See [illegible] TSALEF # [illegible]

K. Handling Codes for Wastes Listed Above: a. b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date: Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date: Month Day Year

EPA Form 8700-22 (3-84) Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No.

2. Page 1 of

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. Manifest Document Number CWMA 196941

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

7. Transporter 2 Company Name | 8. US EPA ID Number

D. State Transporter's ID

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.0.0.0.6.2.2.4.6.4

E. State Facility's ID

F. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. N.O.S. CWM Profile Number	1	DT			
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

THIS IS TO CERTIFY THAT NO ABSORBANT HAS BEEN ADDED TO THE ABOVE WASTE WHICH WOULD PROHIBIT IT BEING LANDFILLED PER SECTION 3004(C)(1) RCRA. TRAILER#

K. Handling Codes for Wastes Listed Above

a. b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22 (3-84)

Generator No. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address [illegible]

4. Generator's Phone ([illegible])

A. Manifest Document Number CWMA 136942

B. State Generator's ID

5. Transporter 1 Company Name [illegible]

6. US EPA ID Number [illegible]

C. State Transporter's ID

D. Transporter's Phone 205-744-8440

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number A.L.D.O.O.O.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] CWM Profile Number	[illegible]	[illegible]	[illegible]	[illegible]	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

THIS IS TO CERTIFY THAT NO [illegible] ADDED TO THE ABOVE WASTE THAT WOULD PROHIBIT IT BEING LANDFILLED PER RCRA SECTION 3004(C)(1).

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

[illegible]

GENERATOR

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

5. Transporter 1 Company Name | 6. US EPA ID Number | C. State Transporter's ID | D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number | E. State Transporter's ID | F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number | G. State Facility's ID | H. Facility's Phone

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.O.O.O.6.2.2.4.6.4

205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

TRAILER #- 506

K. Handling Codes for Wastes Listed Above

a. b. c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

5. Transporter 1 Company Name | 6. US EPA ID Number

7. Transporter 2 Company Name | 8. US EPA ID Number

9. Designated Facility Name and Site Address | 10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

A.L.D.O.O.O.6.2.2.4.6.4

C. State Transporter's ID

D. Transporter's Phone

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CWM Profile Number					
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

TRAILER # 514

K. Handling Codes for Wastes Listed Above

a. c.

b. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month Day Year

EPA Form 8700-22 (3-84) Continue Int. 1

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: GA 368 009 0005 — Manifest Document No.: 00001

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND STREET
ATLANTA GA 30365

4. Generator's Phone (404) 881-3931

A. State Manifest Document Number: CWMA 196943

B. State Generator's ID

5. Transporter 1 Company Name: ROBBIE D WOODS

6. US EPA ID Number: ALD067138891

C. State Transporter's ID

D. Transporter's Phone: 205-[illegible]

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID

H. Facility's Phone: 205/652-0721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 CWM Profile Number OSAE66901	1	DT	45,000	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for [illegible]: TRA[illegible]

K. Handling Codes for Wastes Listed Above: a. D81 b. c. d.

15. Special Handling Instructions and Additional Information
This is to certify that no absorbant has been added to the above waste which would prohibit its being landfilled per RCRA Section 3004-(C1) / Frank Miles. - S. Campbell

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month Day Year
Sue Fields	Sue Fields for The EPA Administrator	05 16 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
BILLY WADE 33	Billy Wade	5 16 85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year
L R Watt	L R Watt	5 17 85

GENERATOR No. 2 (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GA3680090005 Manifest Document No. 18000
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. EPA
345 COURTLAND STREET
ATLANTA, GA 30365

4. Generator's Phone (404) 881-3931

A. State Manifest Document Number CWMA 196944
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone 205-744-8440

5. Transporter 1 Company Name: ROBBIE D. WOODS
6. US EPA ID Number: ALD067138891

7. Transporter 2 Company Name
8. US EPA ID Number

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

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: A.L.D.0.0.0.6.2.2.4.6.4

G. State Facility's ID
H. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E NA9189 CWM Profile Number OSAE 6901	1	DT	46,500	LB	
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above: TRAILER #514

K. Handling Codes for Wastes Listed Above: a. D81 b. c. d.

15. Special Handling Instructions and Additional Information
I certify that no absorbent has been added to the above waste which would prohibit its being landfilled per RCRA section 3004(C) / Frank Milles / S. Campbell

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: Sue Fields — Signature: Sue Fields for the EPA Administrator — Date: Month 05 Day 16 Year 85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Donald E. Watson — Signature: Donald E. Watson — Date: Month 5 Day 16 Year 85

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

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: L R Watt — Signature: L R Watt — Date: Month 5 Day 17 Year 85

GENERATOR / TRANSPORTER / FACILITY

EPA Form 8700-22 (3-84) GENERATOR No. 2 (Must Accompany Shipment)

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S W
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER
Division Director

TRIP REPORT
May 28, 1985

Site Name and Location:.....Rome I/Coal Tar Pit Site/John Davenport Site

Trip By:.....Claude W. Goodley
Environmental Specialist
Remedial Action Unit

Accompanied By:.....None

Date of Trip:.....May 15-19, 1985

Officials Contacted:.....Sue Fields, OSC
US EPA, Region IV
Atlanta, GA
881-2216

Reference:.....Referral Letter to US EPA requesting use of Superfund to clean-up site, dated May 9, 1985.

Comments:

I arrived in Rome, Georgia at the Coal Tar Pit site at 2:00 p.m. on May 15, 1985 and met with Tracy Burgqest, Project Manager for HAZTECH, EPA's contractor. We walked over the site to delineated the areas for truck loading, storage of coal tar material (solids), decontamination area and to identify the restricted area to be identified with red warning tape. Ms. Burgqest crew and equipment were to arrive later that evening.

We later met with Mr. J. C. Sizemore, Field Supervisor for J. O. Kendrick Construction Company, who is the general contractor for the Rome I project. We were able to establish use of his field office as our operation center. We also visited the Minge Construction Company in East Rome off South Broad Street and was able to secure use of their truck scales. This was the closest available scale to the downtown Coal Tar Pit.

I began my process of notifying the City Manager, Mr. John Bennett, Chief of Police, Joe Cleveland and Fire Chief, Raymond Smith, that the clean up project would begin the next morning (May 16, 1985) at 8:00 a.m. All of these public officials offered their assistance if needed.

Recommendations and Follow-up Required:

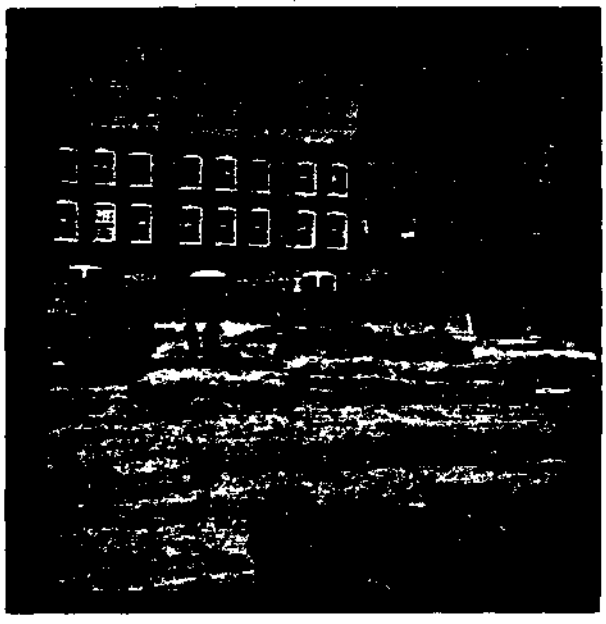
None

Photographs: 18 Polaroids

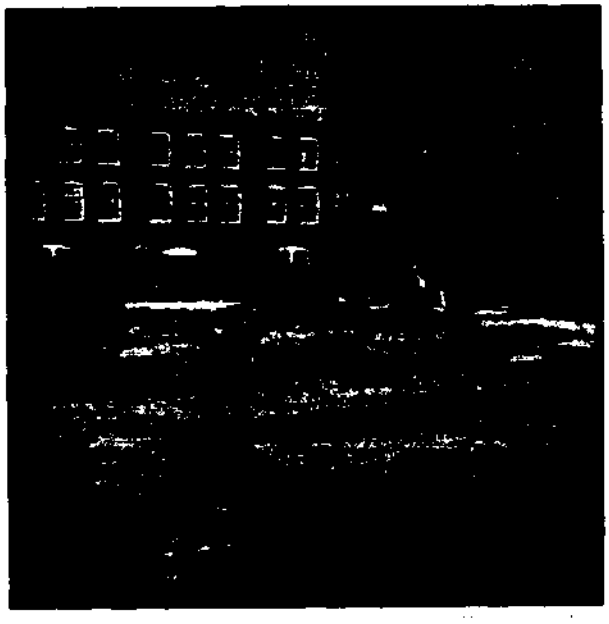
Reviewed By: J. Surowiec

Attachments: None

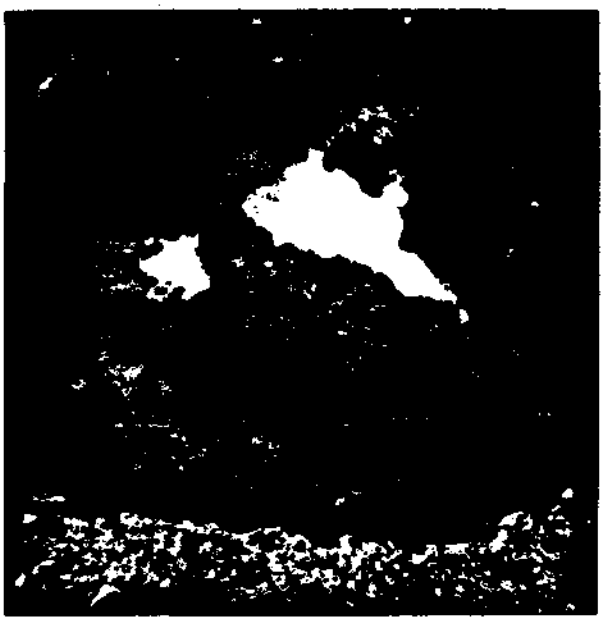
CWG/mcw035
cc: John D. Taylor, Jr.
File - Rome I Coal Tar Pit
John Davenport Site



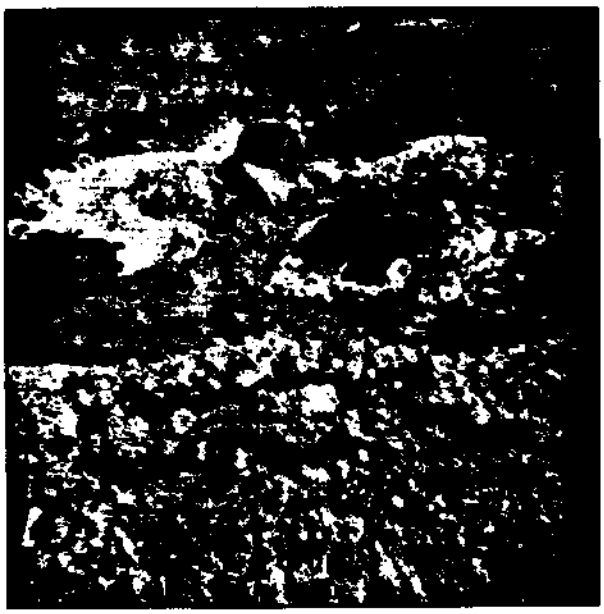
County Name Floyd
Picture No. 1 of 18
Site Name Rome I Coal Tar Pit
Date 5/16/85 Weather Clear
Direction Facing South
Photographer C. Goodley
Program I+HWP
Explanation The Crane is digging out the pit. The Condo are less than ~~other~~ fifty feet away



County Name Floyd
Picture No. 2 of 18
Site Name Rome I Coal Tar Pit
Date 5/16/85 Weather Clear
Direction Facing South
Photographer C. Goodley
Program I+HWP
Explanation Photograph of the beginning of the clean up operation. The ~~Other~~ Crane is digging the pit out.



County Name Floyd
Picture No. 3 of 18
Site Name Rome I Coal Tar Pit
Date 5/16/85 Weather Clear
Direction Facing South
Photographer C. Goodley
Program I + HWP
Explanation This photograph shows the water which has run into the ~~Other~~ pit on top of the semi solid sludge.

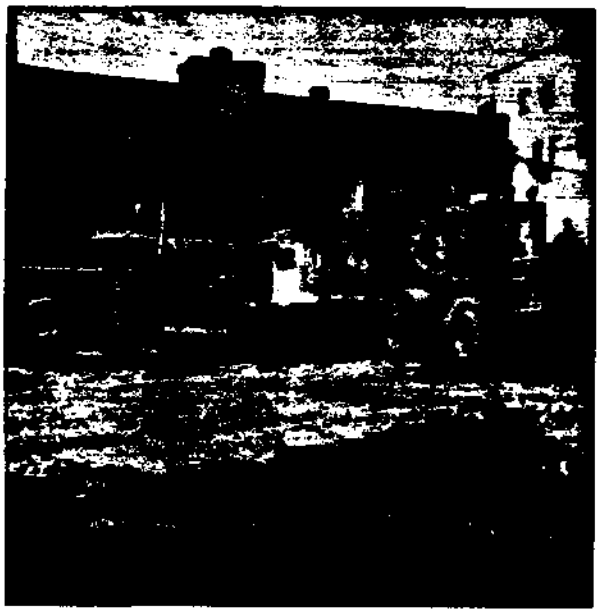


County Name Floyd
Picture No. 4 of 18
Site Name Rome I Coal Tar Pit
Date 5/16/85 Weather Clear
Direction Facing South
Photographer C. Goodley
Program I + HWP.
Explanation The crane has dump poseline into the pit and is stirring ~~Other~~ the material with the bucket.

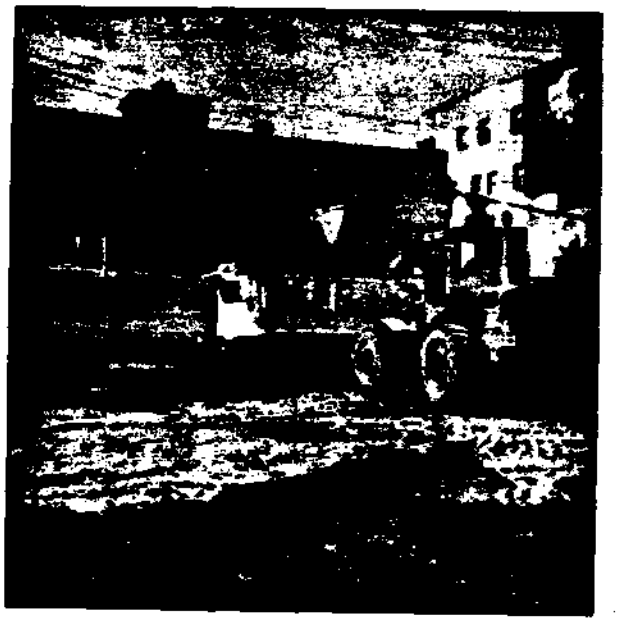
County Name Floyd
Picture No. 5 of 18
Site Name Rome I Coal Tar Pit
Date 5/17/85 Weather Clear
Direction Facing Southeast
Photographer C. Goodley
Program I+HWP
Explanation A photograph of the site from the Decontamination station.
~~Other~~

County Name Floyd
Picture No. 6 of 18
Site Name Rome I Coal Tar Pit
Date 5/17/85 Weather Clear
Direction Facing South
Photographer C. Goodley
Program I+HWP
Explanation This photograph shows the pond which has been
Other dumped over the Liquid Coal Tar.

County Name Floyd
Picture No. 7 of 18
Site Name Rome I Coal Tar Pit
Date 5/18/85 Weather Clear
Direction Facing S.E.
Photographer C. Goodley
Program I + HWP
Explanation Photograph at the pit of a pile of hazardous sludge on the ground
Other

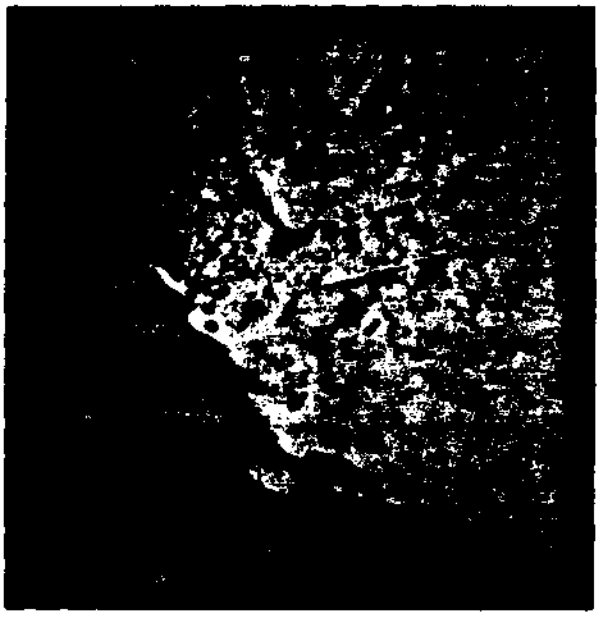


County Name Floyd
Picture No. 8 of 18
Site Name Rome I Coal Tar Pit
Date 5/18/85 Weather Clear
Direction Facing East
Photographer C. Goodley
Program I + HWP
Explanation Photograph of the front end loader loading a trailer.
Other



County Name Floyd
Picture No. 9 of 18
Site Name Rome I Coal Tar Pit
Date 5/18/85 Weather Clear
Direction Facing East
Photographer C. Goodley
Program I+HWP
Explanation Loading of Trailer for Crep to Emelle of Ala.
Other

County Name Floyd
Picture No. 10 of 18
Site Name Rome I Coal Tar Pit
Date 5/18/85 Weather Clear
Direction Facing South
Photographer C. Goodley
Program I+HWP
Explanation Photograph of the bottom of the pit. Positive is on the bottom.
Other

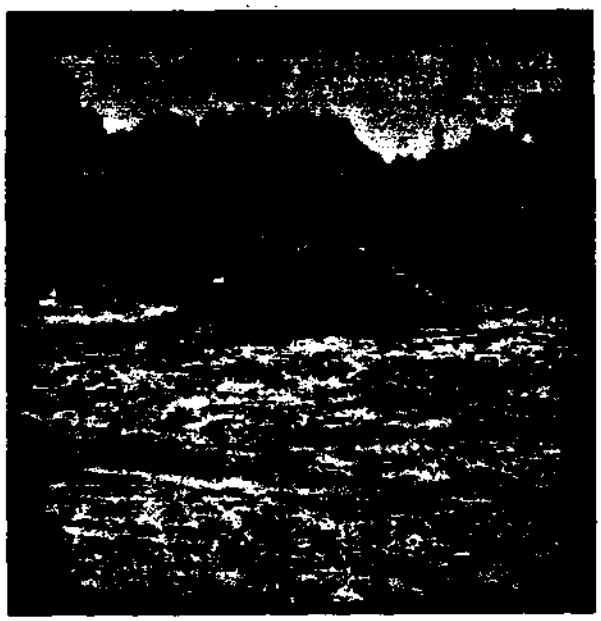


County Name Floyd
Picture No. 11 of 18
Site Name Rome T. Coal Tar Pit
Date 5/8/85 Weather Clear
Direction Facing South
Photographer C. Goodley
Program I & HWP
Explanation Photograph of the bottom of the pit.
Other

County Name Floyd
Picture No. 12 of 18
Site Name Rome T. Coal Tar Pit
Date 5/8/85 Weather Clear
Direction Facing South
Photographer C. Goodley
Program I & HWP
Explanation Photography the bottom of the pit after it had been ~~other~~ limed.

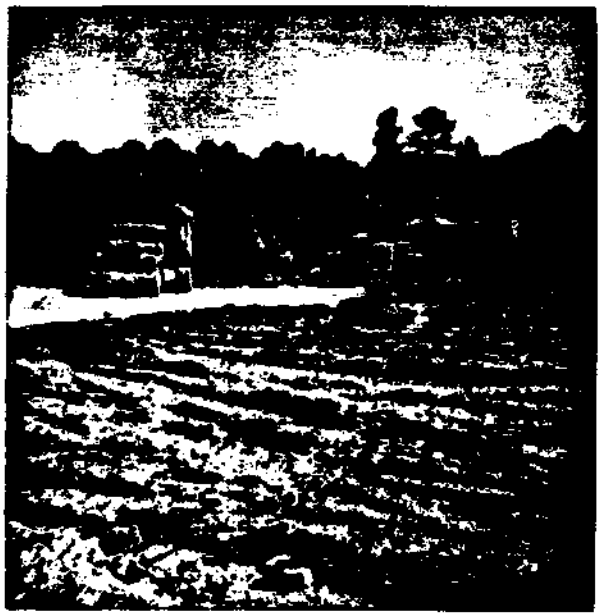
County Name Floyd
Picture No. 13 of 18
Site Name Rome I John Davenport Jr.
Date 5/18/85 Weather Clear
Direction Facing East
Photographer C. Goodley
Program I & HWP
Explanation Photograph of the stock pile of Covered Coal Tar.
~~Other~~

County Name Floyd
Picture No. 14 of 18
Site Name Rome I / John Davenport Jr.
Date 5/18/85 Weather Clear
Direction Facing North
Photographer C. Good
Program I & HWP
Explanation Photograph of the Coal tar pile showing that the main road is only 40 ft. away.
~~Other~~

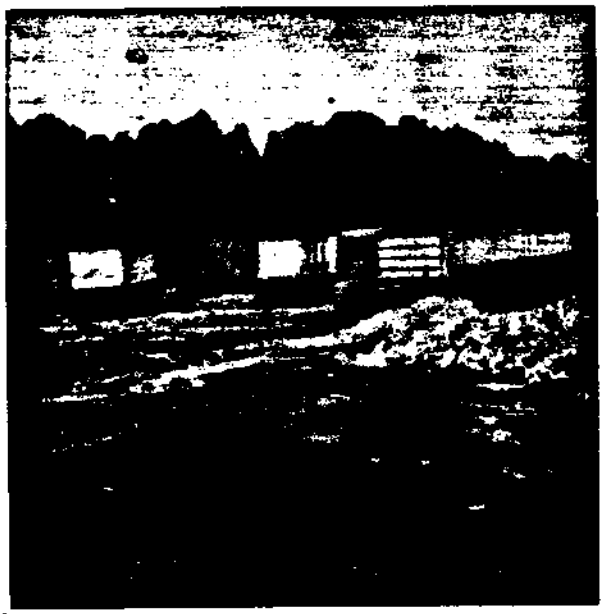


County Name Floyd
Picture No. 15 of 18
Site Name Rome I / John Davenport
Date May 19, 1985 Weather Clear
Direction Facing East
Photographer C. Goodley
Program I & HWP
Explanation Photograph of the remainder of the Coal Tar pile.
Other

County Name Floyd
Picture No. 16 of 18
Site Name Rome I / John Davenport
Date 5/19/85 Weather Clear
Direction Facing East
Photographer C. Goodley
Program I & HWP
Explanation Photograph of loading of Material.
Other

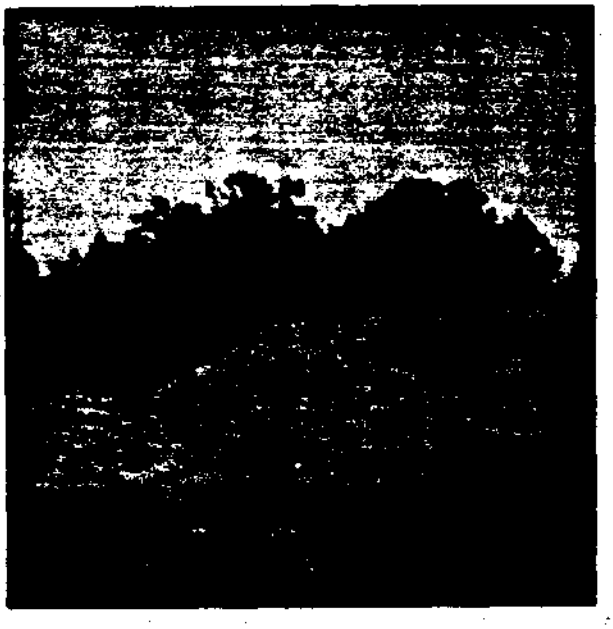


County Name Floyd
Picture No. 17 of 18
Site Name Rome I / John Davenport
Date 5/19/85 Weather Clear Dr.
Direction Facing East
Photographer C. Goodley
Program I & HWP
Explanation Photograph of two trucks one is loaded and one is being loaded.
~~Other~~



County Name Floyd
Picture No. 18 of 18
Site Name Rome I / John Davenport
Date 5/19/85 Weather Clear Dr.
Direction Facing Southwest
Photographer C. Goodley
Program I & HWP
Explanation Photograph of the trucks waiting to be loaded.
Other

County Name Floyd
Picture No. 1 of 2
Site Name John Davenport Dump
Date April 30 Weather Clear
Direction Facing S.E.
Photographer C. Goodley
Program I+HWP
Explanation Photograph of the Coal tar dump at this fill site. The Coal tar has been covered over with Clay material. The pile is 130 ft long and 10 ft high.



County Name Floyd
Picture No. 2 of 2
Site Name John Davenport Dump
Date April 30 Weather Clear
Direction Facing
Photographer S.E.
Program I+HWP
Explanation The Photograph shows a close Distinct view of the covered pile of Coal tar.

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER
Division Director

TRIP REPORT
May 10, 1985

Site Name and Location:.....Rome I Coal Tar Pit-E. C. Systems/
John Davenport Drive
John Davenport Drive
Rome, Georgia 30161

Trip By:.....Claude W. Goodley, Jr.
Environmental Specialist
Remedial Action Unit

Accompanied By:.....None

Date of Trip:.....April 30, 1985

Officials Contacted:.....None

Reference:.....Meeting in EPD offices on April 25, 1985 with E. C. Systems officials.

Comments:

Upon arrival on site at John Davenport Drive I found the stockpile of coal tar as indicated in the attached photographs. The pile is approximately 10-15 feet in height, 50 feet long and 5-8 feet in width. The pile of coal tar had been covered with several inches of clean clay material. There was a slight odor of coal tar present at the time of the inspection. There was only this one pile of material at this location at the of this inspection. A landfilling operation is taking place at this site. The site is being filled with broken concrete, rubble, demolition debris and dirt. There was a chain being used to limit access to the site. There is a drainage ditch 10 feet to the south of the pile, my observation did not indicate any leaching from the coal tar pile. The property is owned by Wheeler Manis, Jr., Manis Building Center, Elizabeth Street, Rome, Georgia 30161, phone number (404)291-2200.

Conclusion:

The waste is in a temporarily stable condition at present. There does not appear to be any dangers to the general public. The area is not open to the general public but the chain across the entrance is the only limiting factor.

AN AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

Recommendations and Follow-up Required:

1. This site should be monitored until the coal tar is removed from the site.

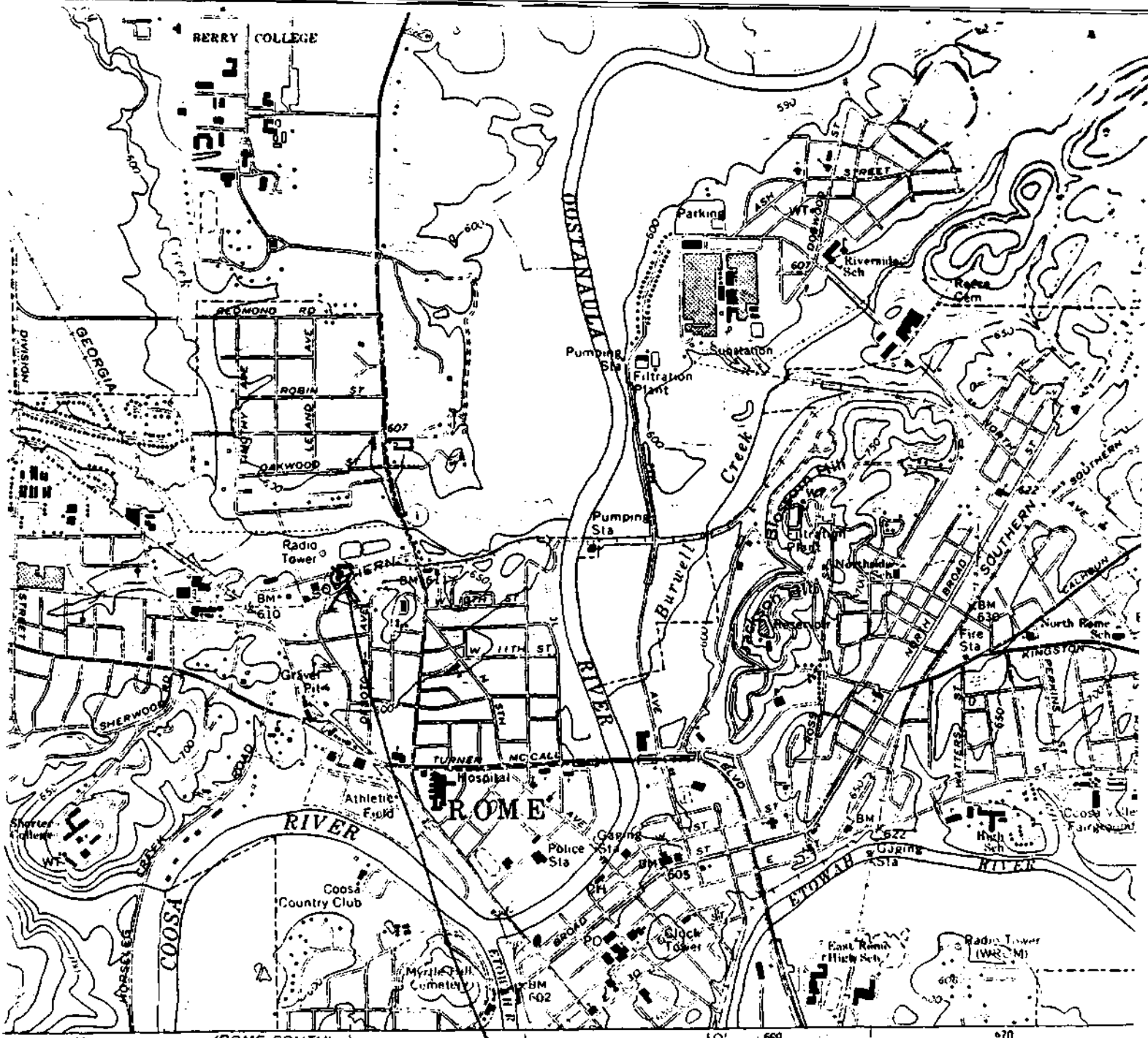
2. Refer this site to the Municipal Solid Waste Control Program.

Photographs: 2 Polaroids

Reviewed By: J. Suronie

Attachments: None

CWG/mcw043
cc: John D. Taylor, Jr.
File - Rome I Coal Tar Pit



Rome I/John Davenport Dr.
Site
85° 11' 02.0" Long.
34° 16' 05.0" Lat.

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D.C. 20242
DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

GEORGIA
QUADRANGLE
ROME NORTH, G.
N3415—[illegible]
1967
AMS [illegible]

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER
Division Director

TRIP REPORT
May 9, 1985

Site Name and Location:.....Rome I Coal Tar Pit Site
West of the intersection of Broad Street and Second Avenue, immediately behind the old Battey Building.

Trip By:.....Claude W. Goodley
Environmental Specialist
Remedial Action Unit

Accompanied By:.....None

Date of Trip:.....April 30, 1985

Officials Contacted:.....None

Reference:.....Trip Report to the site dated 4/16/85.

Comments:

My reinspection of the site does not indicate any changes. The Coal Tar Pit is still open. There were no odors present at the time of the inspection. After talking with several heavy equipment operators on site I was told that the pit is approximately 12 feet deep. Photographs of the pit were taken.

Conclusion:

There has been no change in status at this site. No remedial actions have taken place at the time of this inspection.

Recommendations and Follow-up Required:

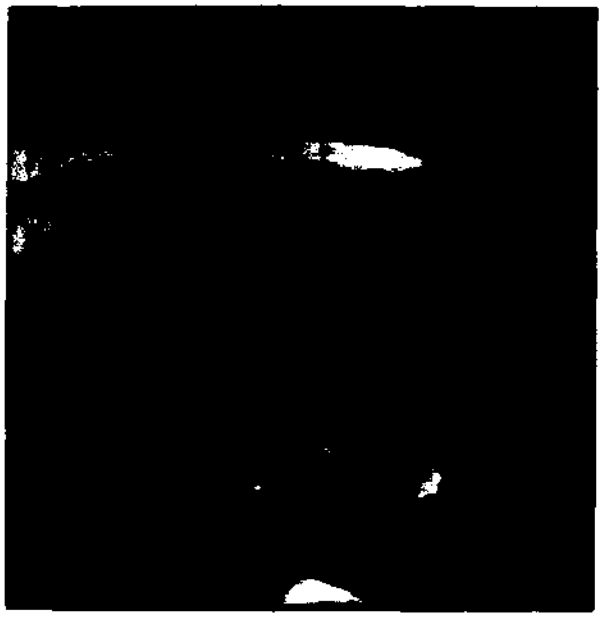
1. Follow-up inspection of this site is required.
2. Remedial Action at this site is required.

Photographs: 2 Polaroid

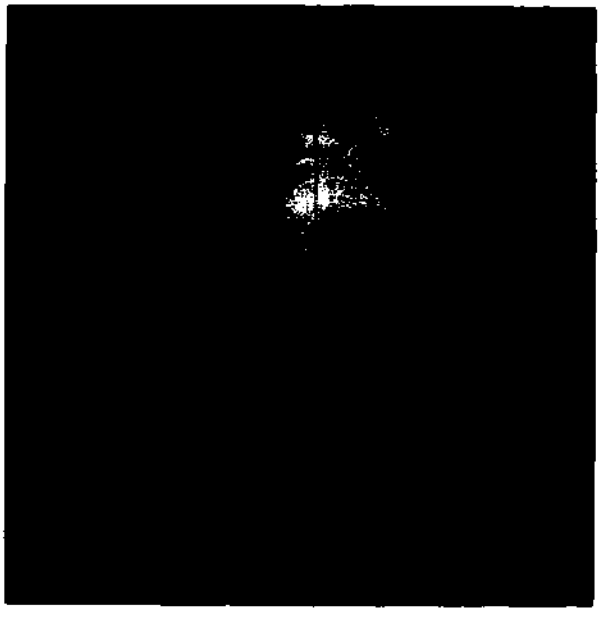
Reviewed By: J. Smovic

Attachments: None

CWG/mcw043
cc: John D. Taylor, Jr.
File - Rome I Coal Tar Pit



County Name Floyd
Picture No. 1 of 2
Site Name Roman I
Date April 30, 1985 Weather Clear
Direction Facing South.
Photographer C Goodley
Program I + HWP
Explanation This is the Coal Tar Pit. In the background you see the area is ~~other~~ marked with ribbon.



County Name Floyd
Picture No. 2 of 2
Site Name Roman I
Date April 30, 1985 Weather Clear
Direction Facing South east
Photographer C. Goodley
Program I + HWP
Explanation This photograph shows how close the Condo unit is to the ~~Other~~ Coal Tar Pit This area is to finally be a parking lot.

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER
Division Director

TRIP REPORT
May 6, 1985

Site Name and Location:.....E. C. Systems, Inc.
Hazardous Waste Site
Northwest of the intersection of Broad Street and 2nd Avenue on 2nd Avenue behind Battey Building
Rome, Georgia 30161

Trip By:.....Claude W. Goodley, Jr.
Environmental Specialist
Remedial Action Unit

Accompanied By:.....None

Date of Trip:.....April 15, 1985

Officials Contacted:.....Mr. Jim Kendrick
General Contractor

Mr. Mike Wrobel
Project Manager
P. O. Box 68
Roswell, Georgia 30077
(404)993-4500
(404)235-8797

Reference:.....Emergency Response referred action on April 12, 1985.

Comments:

I arrived on site at 2:15 p.m. The site is a 20-25 feet in diameter shaft which may be 30 feet plus deep. The shaft is filled with a substance believed to be coal tar. I did examine a sample of the waste and the appearances seem to confirm coal tar (semi-solid). The general area had previously been owned by the Rome Gas Works. The specific site in recent years was covered over by asphalt and was used as a parking lot. Physically the site is located on the alley behind the old Battey Machinery Building off 2nd Avenue. There are other commercial buildings which face Broad Street that are in front of the site. The site is located only a few feet (10-20 feet) from the levee and the River. The Oostanuala River is approximately 75-100 yards away from this site. This waste material has been buried possibly as long as 80 years. The shaft appears to be brick lined all the way down to the bottom. There was some of the material moved to a private fill area on John Davenport Drive. This material was located and covered over with clean clay material. The material in the shaft was covered over with clean clay material and the location was roped off to limit access. Mr. Mike Wrobel stated that E. C. Systems was taking bids to clean up the waste and would need several days to evaluate their options.

AN AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

Conclusions:

It appears that the waste material is coal tar. A sample of the waste has been sent to Harmon Engineering in Auburn, Alabama. Mike Wrobel of E. C. Systems has come to the conclusion that they would have the waste cleaned up.

Recommendations and Follow-up Required:

1. Recommend that E. C. Systems send a sample of the waste material to a laboratory to be analysed for hazardous characteristics and constituents.

2. Recommend that the site be assessed and remediated as quickly as possible.

3. Follow-up inspection required within the next two week period.

Photographs: None

Reviewed By: J. Surowiec

Attachments: None

CWG/mcw022
cc: John D. Taylor, Jr.
File - E. C. Systems, Inc.

PRELIMINARY ASSESSMENT COVER SHEET
ROME COAL TAR PIT
GAD981002983

A. HISTORY OF SITE

A large quantity of coal tar was discovered in an in-ground tank at 102 West Second Avenue in Rome, GA during the construction of the Rivers Place Shopping Center. Historical information indicates the area was used by Rome Gas Works which went out of business 80-90 years ago. Rome Gas Works transferred ownership of the property to Atlanta Gas Light Company which later sold the property to Battey Machine Company. Ownership then transferred to the Roman 1 Investment Company, the investment company now building the Rivers Place Shopping Center. E. C. Systems, Inc., 300 Mansell Road, Roswell, GA 30077, manages the property for Roman 1.

Rome Gas Works is believed to have generated the waste. Due to the proximity of the site to heavily populated areas and the Oostanaula River, an emergency clean-up by the US EPA was requested by the GA EPD for the subject site. Clean up operations began on May 16, 1985 and were completed by May 22, 1985. Removal of all waste was accomplished.

B. NATURE OF HAZARRDOUS MATERIALS

The waste resembles a K087 waste physically and chemically. Its constituents include 1,700 mg/kg of phenols and a toluene extract containing:

Compound	% of Extract
a. naphthalene	40
b. fluoranthene	06
c. chrysene	15
d. acenapthylene	02
e. aliphatic/other	balance

Coal tar sludge is toxic by inhalation and is a known carcinogen. The waste was contained in a metal container 30 feet in diameter and 13 feet deep (236 cubic yards). The container was lined with bricks (3-4 thick) on the inside and outside. The integrity of this container is unknown.

C. DESCRIPTION OF HAZARDOUS CONDITIONS, INCIDENTS, PERMIT VIOLATIONS

The waste material is located in the center of the downtown business district of Rome, GA and is volitile and ignitable. The waste is located 75-100 yards from the Oostanaula River.

D. ROUTES FOR CONTAMINATION

Components of the waste have significant vapor phases and may migrate from the site via an airborne pathway. The structural integrity of the containment vessel is unknown and leakage from the tank may have occurred.

E. POSSIBLE AFFECTED POPULATION AND RESOURCES

Pedestrians, workers and nearby residents may have been exposed to hazardous constituents of the waste via an airborne pathway. The structural integrity of the containment vessel is unknown and waste may have leaked into the groundwater and migrated into the Oostanaula River. No drinking water wells are thought to be in the area.

F. RECOMMENDATIONS AND JUSTIFICATIONS

The US EPA ERCS contractor HAZTECH removed all waste from the site during the period from 5/16/85 to 5/22/85. For the following reasons, a "low" priority Site Inspection is recommended for this site:

1. the structural integrity of the containment vessel is unknown and leakage of the waste may have occurred.

2. the waste was in place for decades.

3. the waste contained constituents listed as acutely hazardous in 40 CFR 261.33(f) as adopted by the Georgia Rules for Hazardous Waste Management.

4. the waste was located in close proximity to a large population center.

G. REFERENCE TO SUPPORTING DATA SOURCES

1. Map USGS, Rome North (1867) and Rome South (1968) Quadrangles, 1:24,000 scale.

2. Memorandum - May 9, 1985, Subject: E. C. Systems - Rome I Coal Tar Pit.

3. Letter - April 25, 1985, to Mr. Michael Wrobel, E. C. Systems, Inc. Vice President/Properties, P. O. Box 68, 800 Mansell Road, Roswell, GA 30077.

4. Letter - April 29, 1985, Mr. Mike Wrobel, E. C. Systems, Inc., P. O. Box 68, Roswell, GA 30077. Regarding analysis of sludge from Rome, GA Project HC&7 Project No. 623-05.

5. Remedial Action Fact Sheet, May 15, 1985 Rome I/Coal Tar Pit/John Davenport Drive.

CPE/mcw046

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
GA	0981002983

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site): Rome Coal Tar Pit	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER: North of the intersection of Broad Street and 2nd Ave. behind Battey Building.

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Rome	GA	30161	Floyd	115	7

09 COORDINATES LATITUDE	LONGITUDE
34° 15' 12.5"	085° 10' 23.5"

10 DIRECTIONS TO SITE (Starting from nearest public road): In downtown Rome at the intersection of Broad Street and 2nd Avenue, turn north onto 2nd Avenue and the site is behind the first building on the right hand side of the street.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)
Roman I Limited/E. C. Systems	800 Mansell Road, P.O. Box 68

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Roswell	GA	30075	(404) 993-4500

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)
E. C. Systems	P. O. Box 68, 800 Mansell Road

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
Roswell	GA	30077	(404) 993-4500

13 TYPE OF OWNERSHIP (Check one)
☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☐ A. RCRA 3001 DATE RECEIVED: __/__/__ (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: __/__/__ (MONTH DAY YEAR) ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES DATE 04/15/85 (MONTH DAY YEAR)
☐ NO

BY (Check all that apply)
☐ A. EPA ☐ B. EPA CONTRACTOR ☒ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)
CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)
☐ A. ACTIVE ☒ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
_____ BEGINNING YEAR | _____ ENDING YEAR ☒ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Coal tar was the suspected substance present - dark black in color, in a solid state, possibly buried for 80 years or more.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
Coal tar is combustible, toxic by inhalation and a known carcinogen. Contains constituents listed in 40 CFR Section 261.33(f).

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Mike Wrobel	E. C. Systems	(404) 993-4500

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Charles P. Evans CPE	DNR	EPD-RAU	404 656-7404	05/29/85 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

J. Aurouric

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
GA	D981002983

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☒ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ☐ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TONS _____

CUBIC YARDS 236

NO. OF DRUMS _____

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ☒ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	236	CY	None
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SLU	coal tar sludge	999	LF	unknown	NA

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references, e.g., state files, sample analysis, reports)*

GA EPD Files

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
GA	D981002983

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Waste may have leaked from container and contaminated groundwater.

01 [X] B. SURFACE WATER CONTAMINATION — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Possible contamination of the Oostanaula River.

01 [ ] C. CONTAMINATION OF AIR — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

NA

01 [ ] D. FIRE/EXPLOSIVE CONDITIONS — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

NA

01 [ ] E. DIRECT CONTACT — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

NA

01 [X] F. CONTAMINATION OF SOIL — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) — 04 NARRATIVE DESCRIPTION

Soil under and around containment vessel may be contaminated.

01 [ ] G. DRINKING WATER CONTAMINATION — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

NA

01 [ ] H. WORKER EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

NA

01 [X] I. POPULATION EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
GA	D981002983

II. HAZARDOUS CONDITIONS AND INCIDENTS *(Continued)*

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NA

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION *(Include name(s) of species)*

NA

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NA

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES *(Spills/runoff/standing liquids/leaking drums)* — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Storage vessel may have leaked.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Unknown

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NA

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NA

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

NA

III. TOTAL POPULATION POTENTIALLY AFFECTED: 500

IV. COMMENTS

All wastes were removed from containment vessel by EPA contractor, HAZTECH, during the period 5/16/85 to 5/22/85.

V. SOURCES OF INFORMATION *(Cite specific references, e.g., state files, sample analysis, reports)*

GA EPD Files.

ROME NORTH, GA.
N3415 – W8507.5/7.5
1967
AMS 3952 I SW – SERIES V845
GEORGIA
QUADRANGLE LOCATION
N
Rome Coal Tar Pit
GAD 981002983
SITE
ROME
ROME
Hospital
Athletic Field
Police Sta
Gaging Sta
Clock Tower
Coosa Country Club
Myrtle Hill Cemetery
Golf Course
Shadyside Cem
McCall Hospital
Jr High Sch
East Rome High Sch
Radio Tower (WROM)
Coosa Valley Fairgrounds
North Rome Sch
Fire Sta
Reservoir
Pumping Sta
Radio Tower
Gravel Pit
Sewage Disposal
Darlington Sch
Athletic Field
Coosa Valley Tech Sch
DeSoto Park Ch
Hollywood Ch
Antioch Ch
New Zion Ch
Banks Sch
St Marys Sch
Davis Sch
Shorter College
COOSA RIVER
ETOWAH RIVER
SOUTHERN
Silver Creek
ROME SOUTH, GA.
N3407.5 – W8507.5/7.5
1968
AMS 3952 II NW – SERIES V845

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S W
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER
Division Director

May 9, 1985

MEMORANDUM

TO: John D. Taylor, Jr.
Branch Chief
Land Protection Branch

FROM: Joseph T. Surowiec
Unit Coordinator
Remedial Action Unit

SUBJ: E.C. Systems - Rome I Coal Tar Pit

Reference the attached letter to Michael Wrobel relative to the subject site, we are in receipt of E. C. Systems response. We also have received a copy of the waste analysis done by Harmon Engineering & Testing in Auburn, Alabama. The results indicate that the waste is not hazardous by characteristic but resembles the listed waste K087, that is, it is tar sludge and contains significant amounts of naphthalene and phenols.

Historical information indicates that the waste was generated by a company known as the Rome Municipal Gas Works which was closed 80-90 years ago. The exact origin of the tar sludge is unknown. It is important however that we define the waste as K087 if possible.

Please ask the Hazardous Waste Management Program to obtain the background documents for K087 and after review and consultation with my staff regarding operational history of the site, advise us as to whether we have sufficient data to legally define the material as a listed K087 hazardous waste.

JTS/mcw040
Attachments
cc: Jennifer Kaduck
File - Rome I Coal Tar Pit

AN AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S W
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER
Division Director

April 25, 1985

Mr. Michael Wrobel
E. C. Systems, Inc.
Vice President/Properties
P. O. Box 68
800 Mansell Road
Roswell, GA 30077

RE: Rome Coal Tar Pit

Dear Mr. Wrobel:

On April 25, 1985, I met with you, your attorney Mr. James A. Robbins, Ms. Susan M. Fields, US EPA and Mr. Claude W. Goodley, GA EPD to discuss required remedial actions necessary at the subject site.

It is our understanding that through construction of your Rome I project an abandoned subterranean coal tar pit was subsequently and unexpectedly discovered and exposed. This discovery has raised several questions regarding the nature and impact of the site on public health and the local environment. It is therefore required that you expeditiously accomplish the following actions:

1. Identify the constituents and characteristics of the subject waste contained in the pit by laboratory analysis. Further, submit this analysis to this office as soon as possible so that we may determine whether the waste is identified as hazardous in accordance with Section 391-3-11-.07 of the Georgia Hazardous Waste Management Rules. (Copy Enclosed)

2. Proceed to retain a private geotechnical firm to explore the structural integrity of the pit and determine if there has been or currently exists a release of the subject waste into the environment. It is also necessary that from this assessment a stratographic profile be developed describing the geology immediately beneath the site down to the uppermost aquifer. Provide a report of your finding to this office for review.

3. Indicate to this office in writing by May 2, 1985 your intent to accomplish items 1 and 2 above.

4. Provide to this office as soon as possible, under a separate letter, a proposed schedule of actions including startup and completion dates so that we may monitor your progress and oversee activities.

We appreciate your interest and motives for resolving this issue in a timely and cost effective manner and intend to work with you in any way possible to remediate this situation.

Should you have any questions regarding what is required at this site please feel free to contact me at (404)656-7404.

Sincerely,

Joseph T. Surowiec
Unit Coordinator
Remedial Action Unit

JTS/mcw031
Enclosure
cc: John D. Taylor, Jr.
Susan M. Fields
File - Rome Coal Tar Site

HARMON ENGINEERING & TESTING

AUBURN INDUSTRIAL PARK, AUBURN, AL 36830-4399 (205) 821-9250

LABORATORY RESULTS

EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Attention: Mike Robel

HE&T PROJECT 623-05

DATE SAMPLE RECEIVED 4-19-85

DATE DATA TRANSMITTED 4-29-85

CLIENT JOB REFERENCE Sludge from Rome, Georgia

E.P. TOXICITY METALS

HE&T Sample Number	Client Sample Identification	As mg/L	Ba mg/L	Cd mg/L	Cr mg/L	Hg mg/L	Pb mg/L	Se mg/L	Ag mg/L
1587	Tar Sludge	0.02	<0.5	<0.02	0.06	<0.001	<0.02	<0.005	<0.02

		Corr. (pH) S.U.	Reactivity +or-	Ignitability °C	Phenols mg/kg	Total Cyanides mg/kg	Sulfides mg/kg	PCB mg/kg
1587	Tar Sludge	7	Neg.	>60	1678	5.9	<10	<10

Organic Analysis of Toluene Extract

	Component	Percentage Estimated of Extract
1587 Tar Sludge	Napthalene	40
	Fluoranthene	6
	Chrysene	15
	Acenapthylene	2
	Aliphatic/Other Hydrocarbons	Balance

Approved for Transmittal

Terence A. Whitt/MS

Laboratory Manager

HARMON ENGINEERING & TESTING
SCIENTISTS • ENGINEERS • CONSTRUCTORS
AUBURN INDUSTRIAL PARK AUBURN, ALA. 36830-4399
205 821-9250

RECEIVED
MAY 9 1985
REMEDIAL ACTIONS UNIT

April 29, 1985

Mr. Mike Robel
EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Re: Analysis of Sludge from Rome, Georgia Project
HE&T Project No. 623-05

Dear Mr. Robel:

In accordance with the verbal instructions of Jim Kendrick, Harmon Engineering & Testing (HE&T) has completed the analysis of a sludge sample collected by Mr. Kendrick from the "tar pit" unearthed in Rome, Georgia. The data sheet is attached.

Testing was performed according to the State of Georgia Hazardous Waste Management Regulations given at 391-3-11.07. These tests showed that the hazardous waste characteristics of EP Toxicity, ignitability, reactivity and corrosivity were all negative.

Additional testing was done to determine if the waste contained any of the so-called "Appendix VIII" compounds. The sample was extracted in a soxhlet apparatus using toluene; this extraction was diluted and analyzed by gas chromatography mass spectroscopy (GCMS). The results indicated that the principal components of the sample were polynuclear aromatic hydrocarbons and aliphatic hydrocarbons. These results indicate that EPD can classify the waste as hazardous.

We are continuing to discuss this situation with soils engineering firm and can, if you desire, provide complete turnkey studies to meet the EPD requirements. If you have any questions, please feel free to call on us.

Sincerely,

HARMON ENGINEERING & TESTING

Mark Shearon
Vice President
Environmental Division

MS:vn

Enclosure

Claude Goodley

REMEDIAL ACTION
FACT SHEET

DATE: May 15, 1985

SITE NAME: Rome I/Coal Tar Pit/John Davenport Drive

PERSON COMPLETING FORM: Claude W. Goodley
Environmental Specialist
Remedial Action Unit

PARTIES ASSOCIATED WITH THE
REMEDIAL ACTION:

1. Names of Responsible Party/Owner: E. C. Systems
Mike Wrobel, Project Manager
P. O. Box 68
Roswell, Georgia 30077

2. Federal (EPA) and State (EPD) Officials:

EPD Contact: Lucy Justice Phone #: (404)656-6905

EPA Contact: Frank Redmond Phone #: (404)881-3004

3. Names of Contractors:
Hazardous Waste Technology Serviced (HAZTECH)

4. Names of Transporters:
N/A at present

5. Name(s) of Disposal Site(s):
Chem-Waste Management, Inc. (Emelle, Alabama)

WASTES INFORMATION

1. List of Waste(s) including names and types:
Coal tar sludge with the following constituents identified through laboratory analysis at Harmon Engineering, Auburn, Alabama. (See attached)

1. Phenols.....1,700 ppm
2. Toluene extract
   a. naphthalene.....40%
   b. fluoranthene.....06%
   c. chrysene.....15%
   d. acenapthylene.....02%

2. Estimate(s) of Waste Amount(s):

Estimated amount of waste at both locations in total is 100 cubic yards - 200 cubic yards.

3. Toxicity Information (as available):

Information from the Condensed Chemical Dictionary, Tenth Edition indicates that the Coal Tar sludge is toxic by inhalation and a known carcinogen.

4. Characteristics (physical description including physical properties under ambient conditions) and Former Usage:

This coal tar at the Romel site is a semi-solid with a naphthalene-like odor.

5. Anticipated Environmental Pathways of Migration:

If there is a release to the environment it is suspected through the groundwater.

6. Proposed Clean-up Methods and Associated Clean-up Limits (as known):

Solidify the material with "Posilime", excavate, transport in lined trailers to Emelle, Alabama.

SCHEDULE OF PROPOSED ACTIVITIES

1. Start Date: **5/16/85**

2. Ending Date: **5/22/85**

3. Days and Hours of Operation:

6 days per week (exclude Sunday) from 8:00 a.m. until sundown.

4. Long-term Follow-up Activities: **Unspecified at present.**

a.) Description - (if necessary)

b.) Tentative dates of activities - (List: Action & Date):

REASON FOR REMEDIAL ACTION(S):

Remedial Action(s) indicated resulting from:

Check One:

__ Regulatory Violation - Involuntary
__ Voluntary
_X_ Emergency Cleanup
__ Superfund

Comments/Description:

SITE LOCATION AND ENVIRONMENTAL SETTING

1. City: **Rome, Georgia**

2. County: **Floyd**

3. Address: **SW of the intersection of Broad Street and 2nd Avenue.**

4. Environmental Setting: (ie: physical or natural factors affecting contaminant migration):

This area is ± 100 yards from theOostanaula River. The site actually sits on approximately 8-15 feet of fill material used to raise the streets of Rome, Georgia above the flood plain.

5. Demographic Setting: (ie: rural, urban etc.)

The site is located in an urban/commercial setting. The site is one street over from Broad Street, a major street in Rome, Georgia.

INDICATED SAFETY RESTRICTIONS OR PRECAUTIONS

1. Environmental Monitoring During Cleanup

a.) Air - **Air monitoring for vapors released from the pit.**

b.) Water - **Groundwater monitoring may be required at a later date to determine if any of the waste has leached into the water/**

c.) Land - **Minimize any contaminated soil loss.**

Narrative (briefly described monitoring procedures indicating what type, how, why, etc.)

2. Monitoring Location(s): (describe where monitoring will occur and relationship to site)

Monitoring locations have not been designated as of yet.

3. Public Safety Official(s):
(name and agency)
Chief of Police, Joe Cleveland, (404)291-0977
Fire Chief, Raymond Smith, (404)291-4221, (Emergency 291-4222)
In Rome, Georgia.

4. Waste Handling Activities:

How will materials be handled (removed & packaged):
The sludge will be dug out of the pit and mixed with "Posilime" to solidigy and then placed in lined trailers.

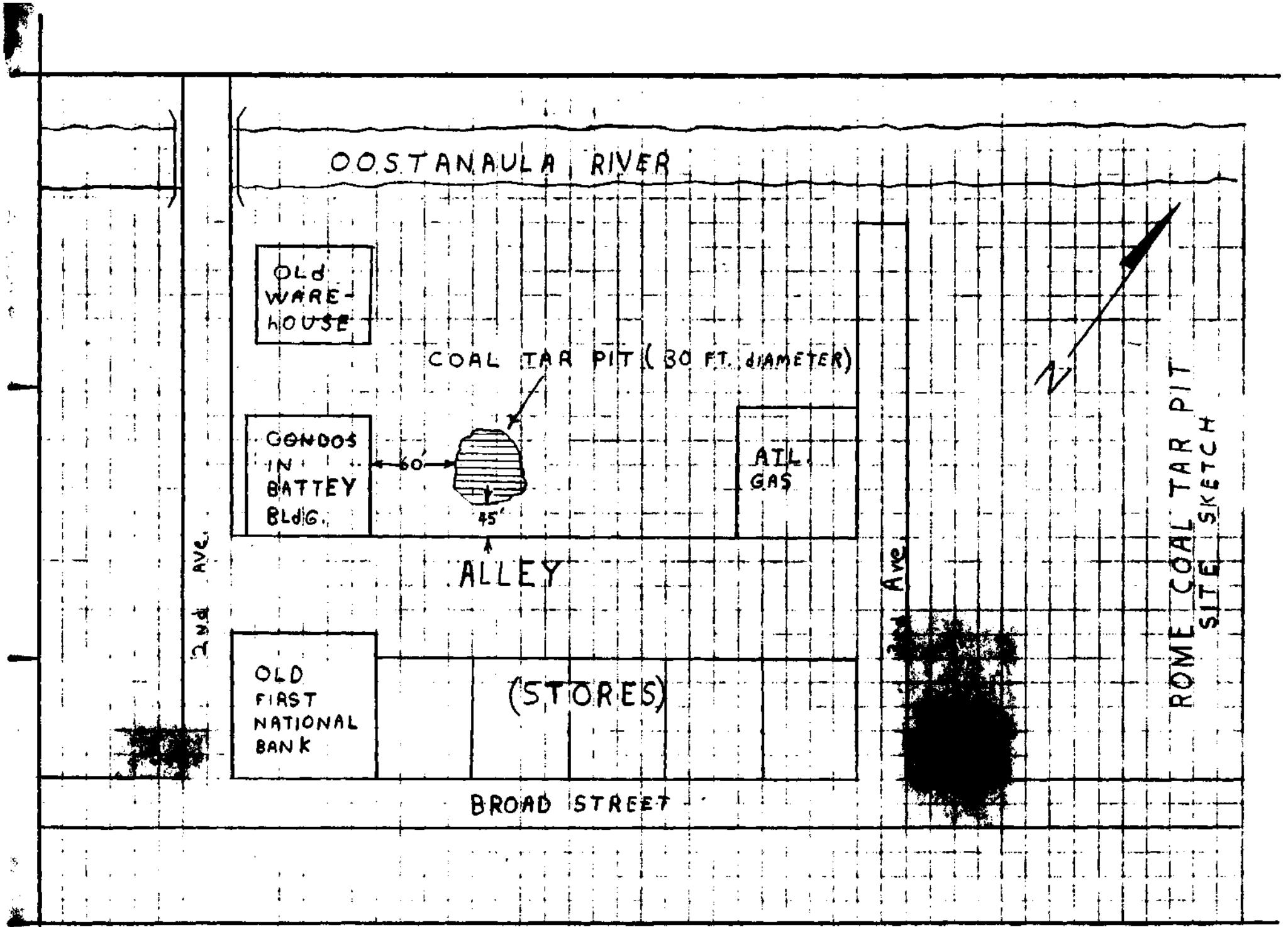
Describe transportation route(s):
N/A

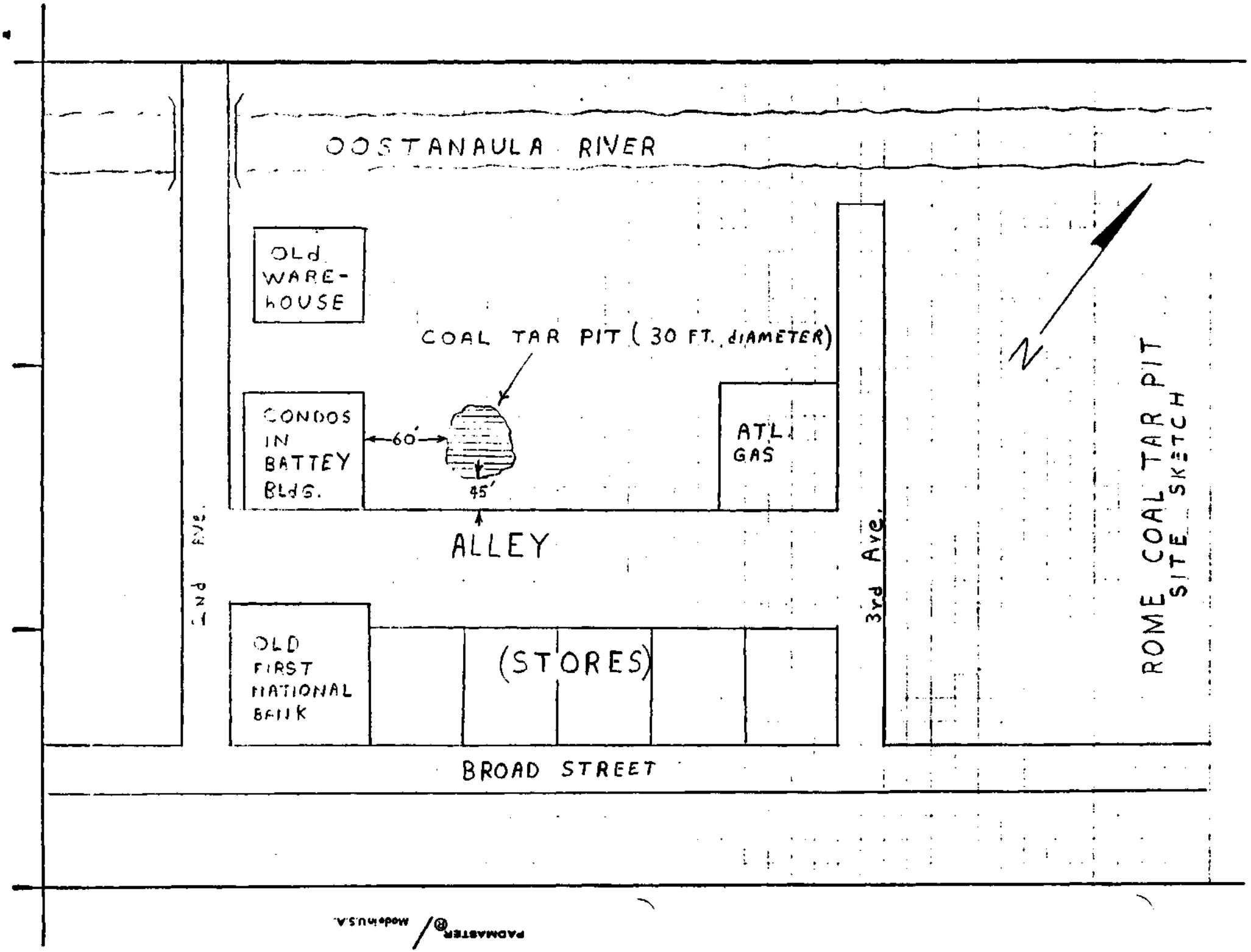
Describe decontamination precautions:
All personnel and equipment, including the trucks, will be decontaminated before leaving the site.

5. Site Restrictions:
Delineate area to be restricted during activities relating how delineation can be identified and/or enforced.
The sites will be designated by using bright orange "Do Not Enter - Hazardous Waste" tape. EPA/HAZTECH and State personnel will restrict access into the site.

COMMENTS:

The John Davenport Drive site will be handled at the same time and in a similar manner as the Coal Tar Pit.


OOSTANAULA RIVER
OLd WARE-HOUSE
COAL TAR PIT (30 FT. diAMETER)
CONDOS IN BATTEY BLdG.
60'
45'
ATL GAS
ALLEY
2nd AVE.
3rd Ave.
OLD FIRST NATIONAL BANK
(STORES)
BROAD STREET
N
ROME COAL TAR PIT SITE SKETCH


OOSTANAULA RIVER
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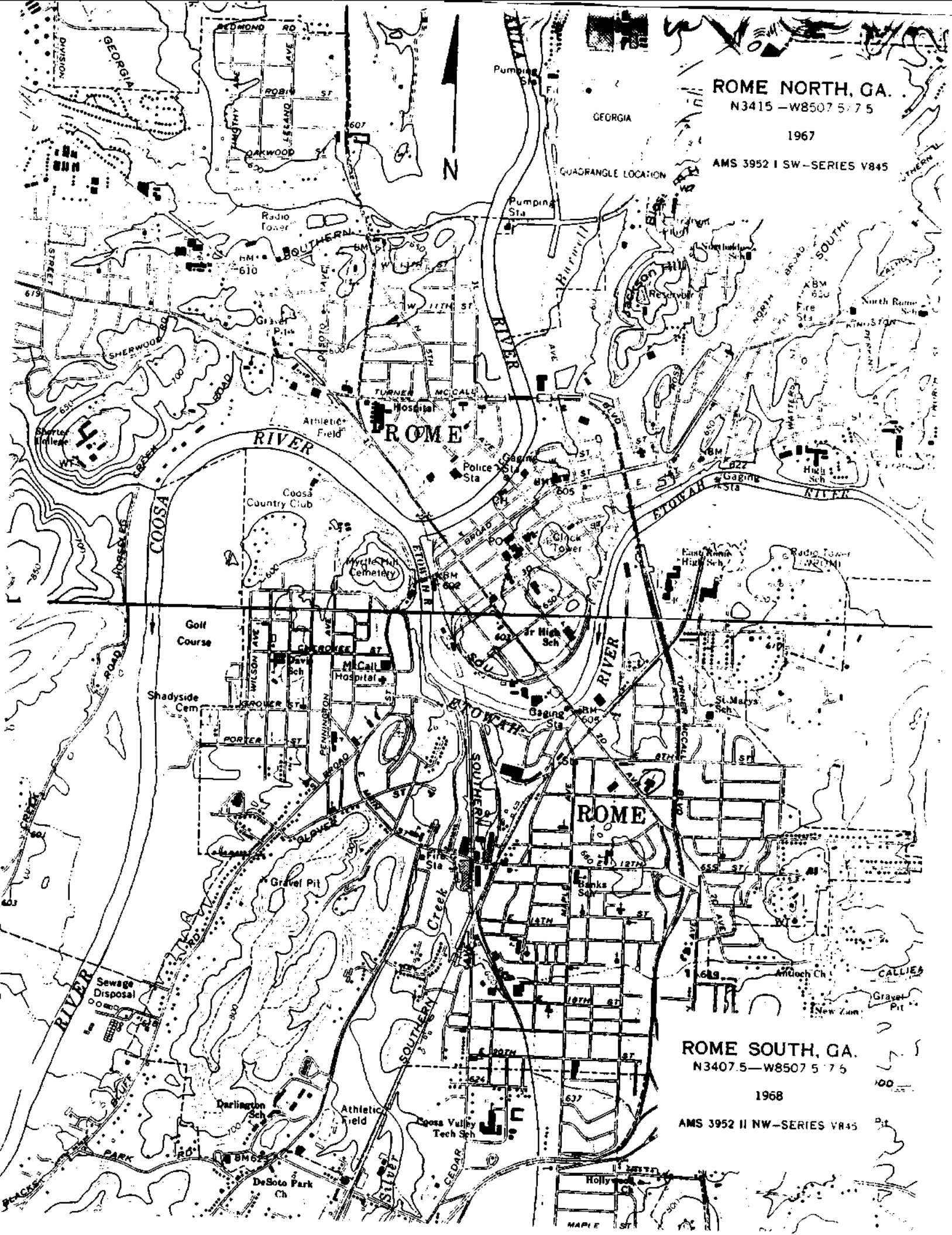
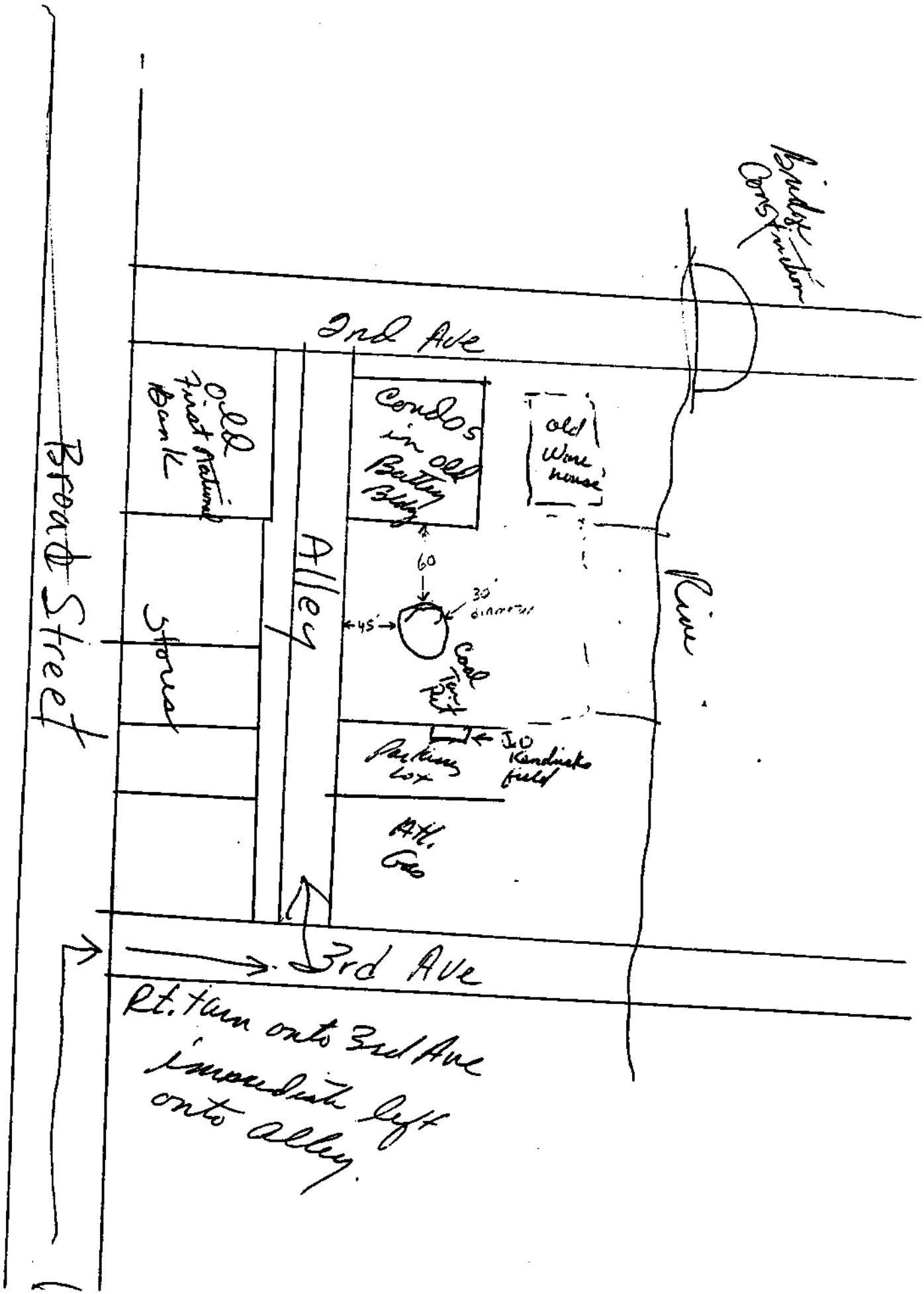
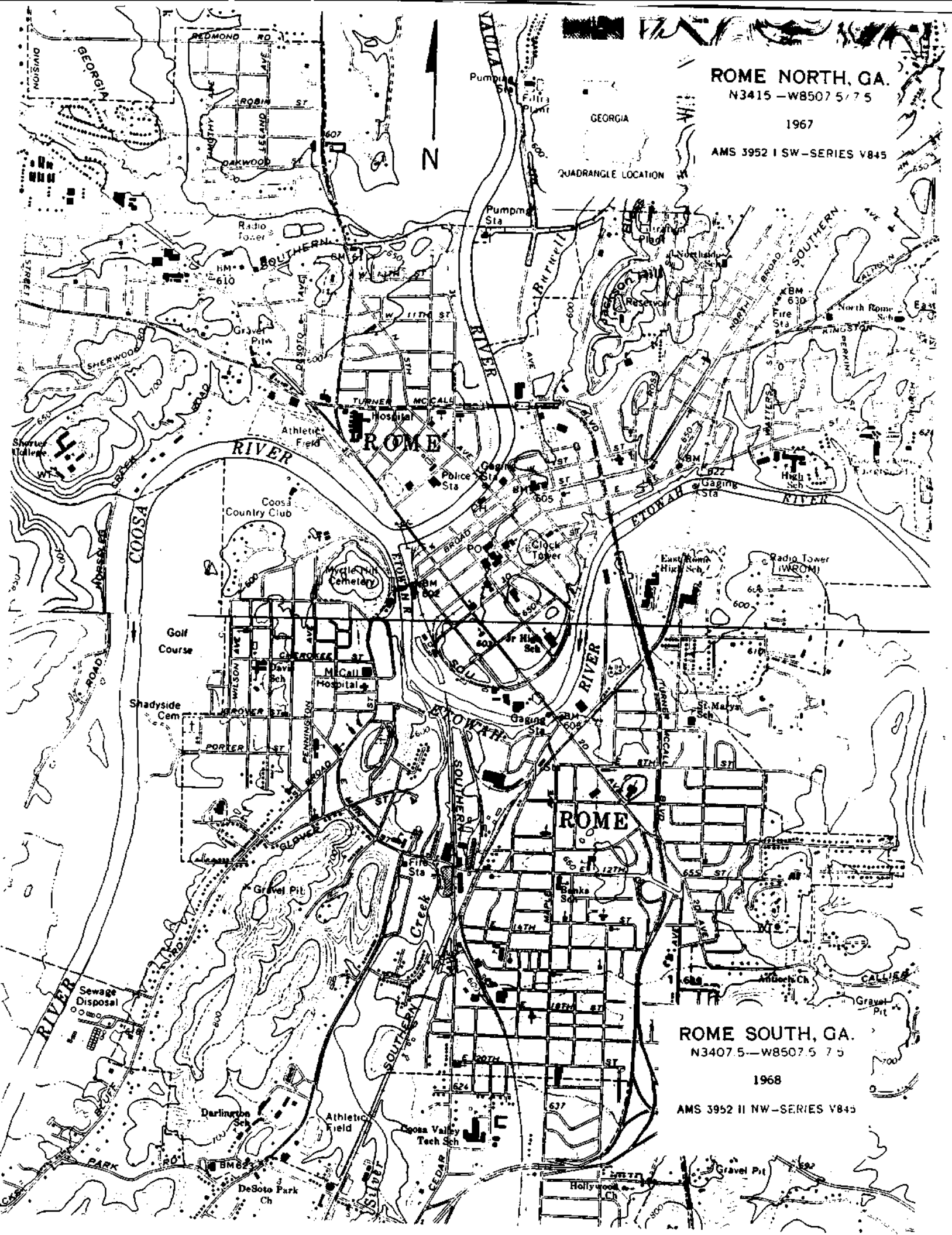
(STORES)
BROAD STREET
ROME COAL TAR PIT SITE SKETCH
N

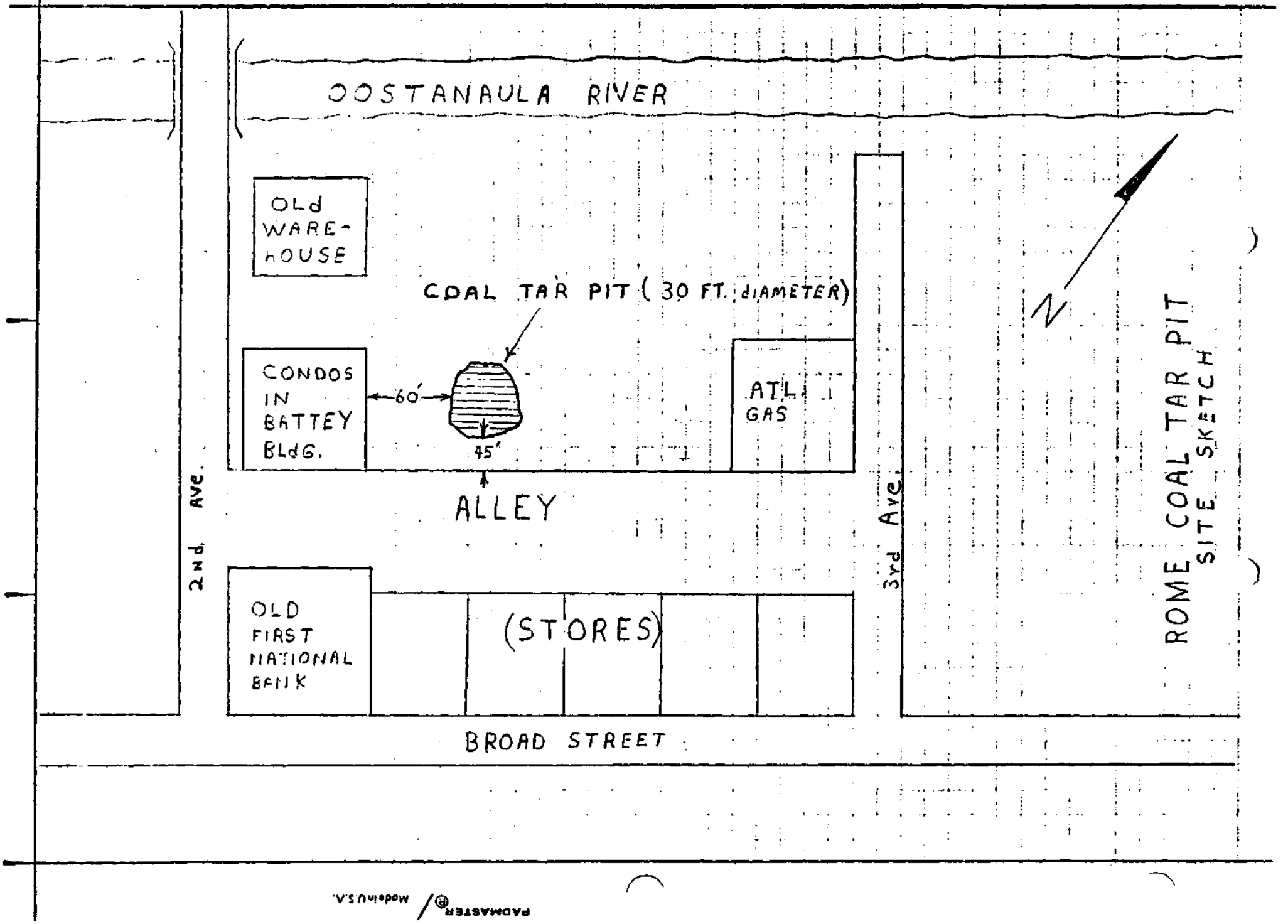

ROME NORTH, GA.
N3415 —W8507 5/7 5
1967
AMS 3952 I SW—SERIES V845
QUADRANGLE LOCATION
GEORGIA
N
ROME
COOSA RIVER
ETOWAH RIVER
SOUTHERN
Coosa Country Club
Golf Course
Shadyside Cem
Myrtle Hill Cemetery
McCall Hospital
Athletic Field
Police Sta
Gaging Sta
Clock Tower
Jr High Sch
St Marys Sch
Fire Sta
Banks Sch
Gravel Pit
Sewage Disposal
Darlington Sch
Coosa Valley Tech Sch
DeSoto Park Ch
Antioch Ch
New Zion
Hollywood Ch
ROME SOUTH, GA.
N3407.5—W8507 5/7 5
1968
AMS 3952 II NW—SERIES V845

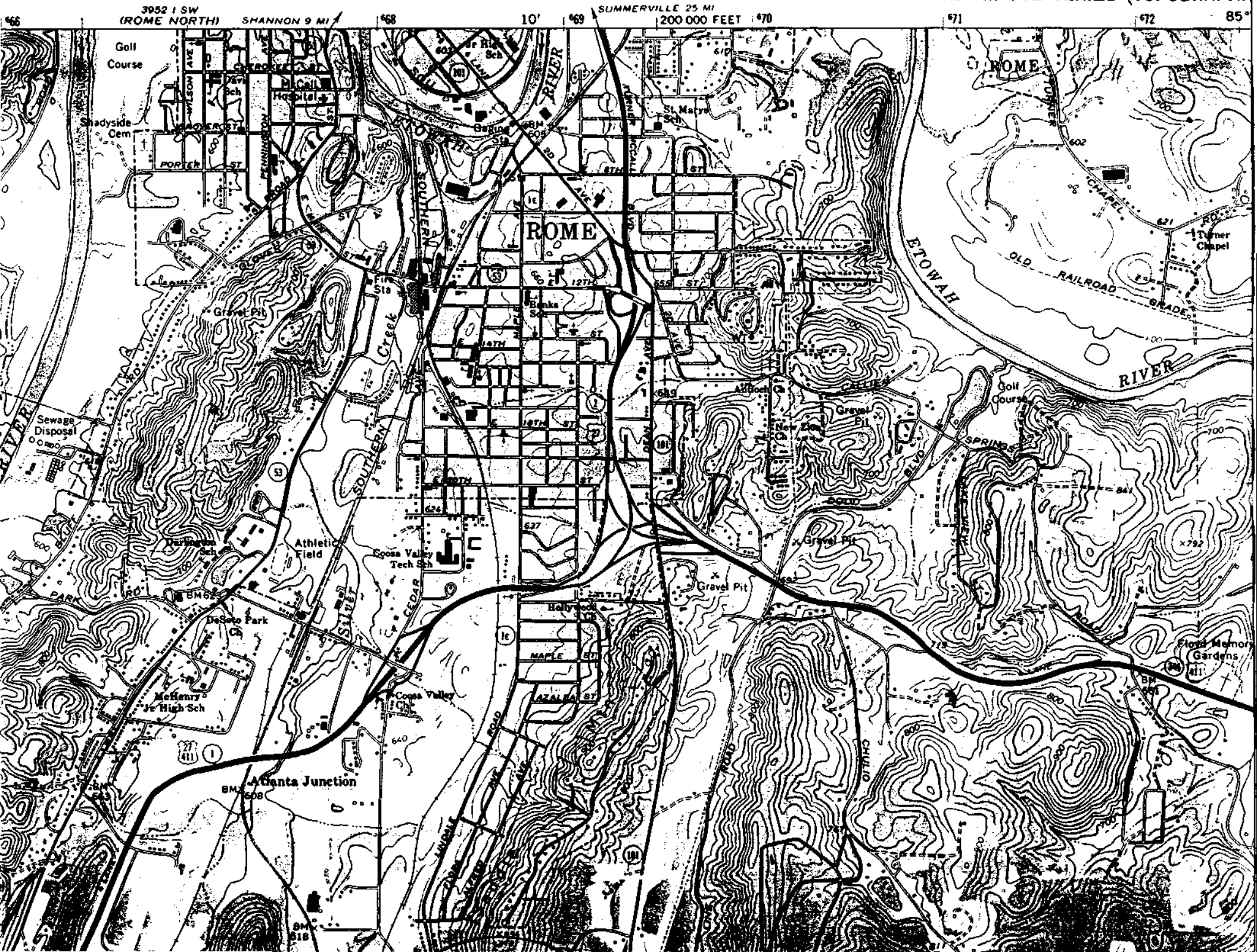


Bridge Construction
2nd Ave
Old First National Bank
Condos in Old Battery Bldg
Old Ware house
Alley
Stores
Broad Street
Rive
60
30' diameter
45'
Coal Tar Pit
Parking Lot
10 Kendricks field
Att. Gas
3rd Ave
Rt. turn onto 3rd Ave
immediate left onto alley.


ROME NORTH, GA.
N3415 —W8507.5/7.5
1967
AMS 3952 I SW—SERIES V845
GEORGIA
QUADRANGLE LOCATION
N
ROME SOUTH, GA.
N3407.5—W8507.5/7.5
1968
AMS 3952 II NW—SERIES V845
ROME
ROME
COOSA RIVER
ETOWAH RIVER
Burwell
Coosa Country Club
Golf Course
Shadyside Cem
Myrtle Hill Cemetery
Hospital
McCall Hospital
Athletic Field
Police Sta
Fire Sta
Gaging Sta
Clock Tower
Jr High Sch
East Rome High Sch
Radio Tower (WROM)
St Marys Sch
Banks Sch
Antioch Ch
Gravel Pit
Sewage Disposal
Darlington Sch
Coosa Valley Tech Sch
DeSoto Park Ch
Hollywood Ch
Silver Creek
Radio Tower
Pumping Sta
Filtration Plant
Reservoir
Fire Sta
North Rome Sch
High Sch
Shorter College
SOUTHERN
GEORGIA

ROME COAL TAR PIT SITE




3952 I SW
(ROME NORTH)
SHANNON 9 MI
SUMMERVILLE 25 MI
10'
200 000 FEET
85°
Golf Course
Shadyside Cem
McCall Hospital
Gaging Sta
St Marys Sch
ROME
ETOWAH RIVER
Turner Chapel
OLD RAILROAD GRADE
Fire Sta
Banks Sch
Gravel Pit
Sewage Disposal
Golf Course
Antioch Ch
New Zion Ch
Gravel Pit
Athletic Field
Coosa Valley Tech Sch
Gravel Pit
Gravel Pit
DeSoto Park Ch
Hollywood Ch
Floyd Memory Gardens
McHenry Jr High Sch
Coosa Valley Ch
Atlanta Junction
SOUTHERN
Silver Creek
CEDAR
PARK RD
MAPLE ST
AZALEA ST
CHULIO
SPRINGS
DODD BLVD
CALLIER
TURNER CHAPEL RD
PENNINGTON
WILSON AVE
PORTER ST
GLOVER ST
12TH ST
14TH ST
18TH ST
20TH ST
8TH ST
DEAN AVE
LINDALE AVE
ROAD

Big Dry Creek
THREEMILE ROAD
Radio Facility
OOSTANAULA
Coker Lake
BERRY COLLEGE
4 LANE
REDMOND RD
ROBIN ST
OAKWOOD ST
Parking
Riverside Sch
Substation
Pumping Sta
Filtration Plant
Burwell Creek
Radio Tower
SOUTHERN
BM 610
W 11TH ST
Gravel Pit
TURNER MCCALL
Hospital
RIVER
NORTH BROAD
Radio Tower
Radio Tower
BELLS FERRY ROAD
PIPELINES
Armory
MITCHELL ROAD
Fire Sta
North Rome Sch
Coosa Valley
17'30"
3796
3794
3793
SHANNON 4.9 MI.
19 MI. TO INT. 75

OVERSIZED

DOCUMENT

REMEDIAL ACTION
FACT SHEET

DATE: **May 8, 1985**

SITE NAME: **Rome I/Coal Tar Pit/John Davenport Drive**

PERSON COMPLETING FORM: **Claude W. Goodley**
Environmental Specialist
Remedial Action Unit

PARTIES ASSOCIATED WITH THE REMEDIAL ACTION: **Joseph T. Surowiec**
Unit Coordinator
Remedial Action Unit

1. Names of Responsible Party/Owner:
Rome I/E. C. Systems, Inc.
Mike Wrobel, Project Manager

2. Federal (EPA) and State (EPD) Officials:

EPD Contact:	**Claude W. Goodley** **Joseph T. Surowiec**	Phone #: **(404)656-7404**
EPA Contact:	**Sue Fields**	Phone #: **(404)881-2216**

3. Names of Contractors:
N/A at present

4. Names of Transporters:
N/A at present

5. Name(s) of Disposal Site(s):
N/A at present

WASTES INFORMATION

1. List of Waste(s) including names and types:
Suspected K087 waste.
Coal tar sludge with the following constituents identified through laboratory analysis at Harmon Engineering, Auburn, Alabama.

1. **Phenols.....1,700 ppm**
2. **toluene extract**
   a. **naphthalene.....40%**
   b. **fluoranthene.....06%**
   c. **chrysene.....15%**
   d. **acenapthylene.....02%**

2. Estimate(s) of Waste Amount(s):
   Estimated amount of waste at both locations in total is 100 cubic yards - 200 cubic yards.

3. Toxicity Information (as available):
   Information from the Condensed Chemical Dictionary, Tenth Edition indicates that the Coal Tar sludge is toxic by inhalation and a known carcinogen.

4. Characteristics (physical description including physical properties under ambient conditions) and Former Usage:
   This coal tar at the Rome I site is a semi-solid with a naphthalene-like odor.

5. Anticipated Environmental Pathways of Migration:
   If there is a release to the environment it is suspected through the groundwater.

6. Proposed Clean-up Methods and Associated Clean-up Limits (as known):
   Undetermined at present.

SCHEDULE OF PROPOSED ACTIVITIES

1. Start Date: **Unknown**
2. Ending Date: **Unknown**
3. Days and Hours of Operation: **Unknown**

4. Long-term Follow-up Activities: **N/A**

   a.) Description - (if necessary)

   b.) Tentative dates of activities - (List: Action & Date):

REASON FOR REMEDIAL ACTION(S):

Remedial Action(s) indicated resulting from:

Check One:

__ Regulatory Violation - Involuntary
__ Voluntary
__ Emergency Cleanup
__ Superfund

Comments/Description:

SITE LOCATION AND ENVIRONMENTAL SETTING

1. City: **Rome, Georgia**

2. County: **Floyd**

3. Address: **SW of the intersection of Broad Street and 2nd Avenue.**

4. Environmental Setting: (ie: physical or natural factors affecting contaminant migration):
   This area is ± 100 yards from the Oostanuala River. The site acutally sits on approximately 8-15 feet of fill material used to raise the streets of Rome, Georgia above the flood plain.

5. Demographic Setting: (ie: rural, urban etc.)
   The site is located in an urban/commercial setting. The site is one street over from Broad Street, a major street in Rome, Georgia.

INDICATED SAFETY RESTRICTIONS OR PRECAUTIONS

1. Environmental Monitoring During Cleanup

   a.) Air - **Air monitoring is required due to any toxic gas released from the pit.**

   b.) Water -**Ground water monitoring is required to determine if any of the hazardous wastes have leached into the water.**

   c.) Land - **Minimize any contaminated soil loss.**

   Narrative (briefly described monitoring procedures indicating what type, how, why, etc.)

2. Monitoring Location(s): (describe where monitoring will occur and relationship to site)

Monitoring locations have not been designated as of yet.

3. Public Safety Official(s):
(name and agency)
Chief of Police, Joe Cleveland, (404)291-0977
Fire Chief, Raymond Smith, (404)291-4221, (Emergency 291-4222)
In Rome, Georgia.

4. Waste Handling Activities:

How will materials be handled (removed & packaged):

N/A

Describe transportation route(s):

N/A

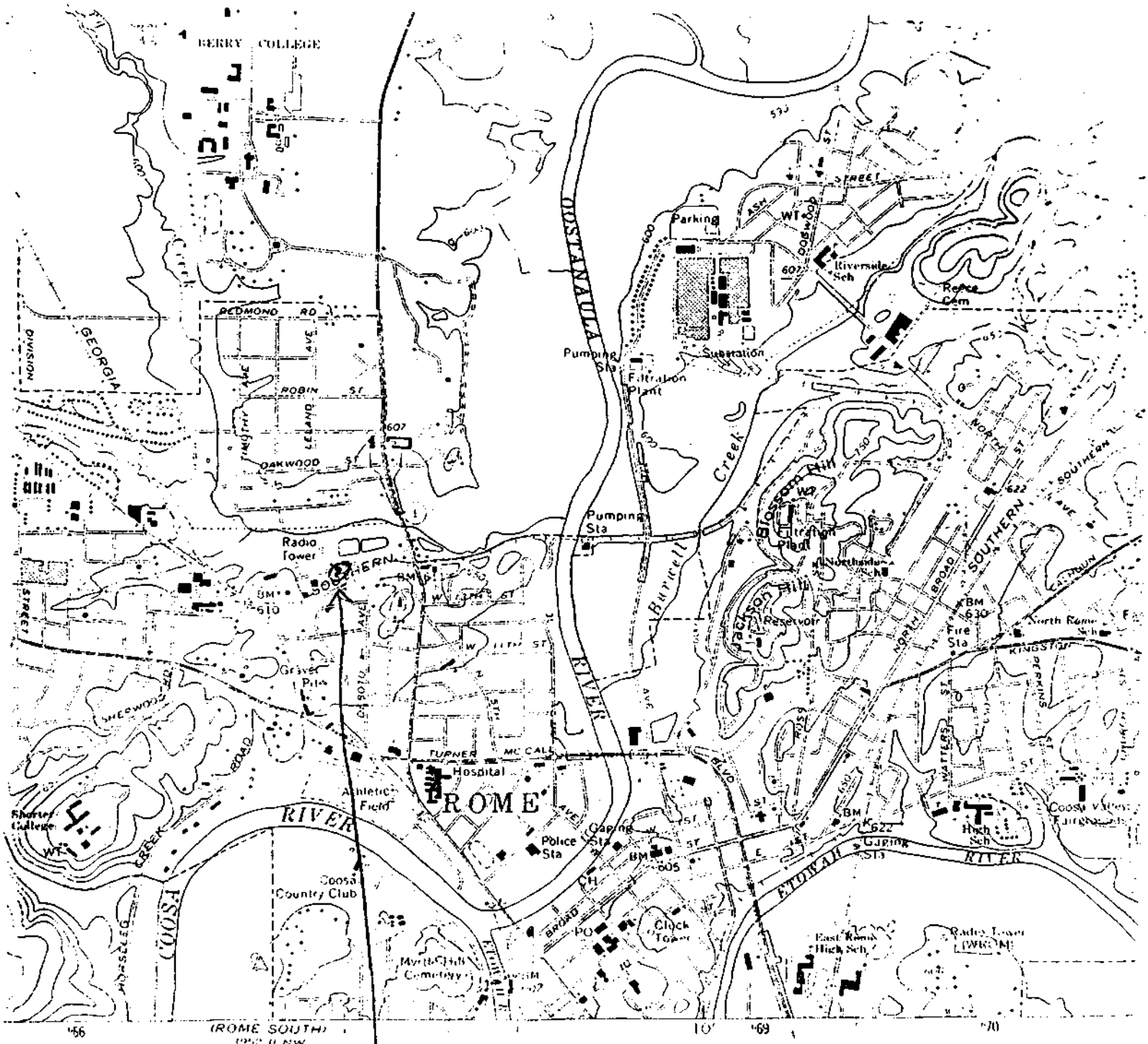
Describe decontamination precautions:

N/A

5. Site Restrictions:
Delineate area to be restricted during activities relating how delineation can be identified and/or enforced.

N/A

COMMENTS:



Roman I / John Davenport Dr.
Site

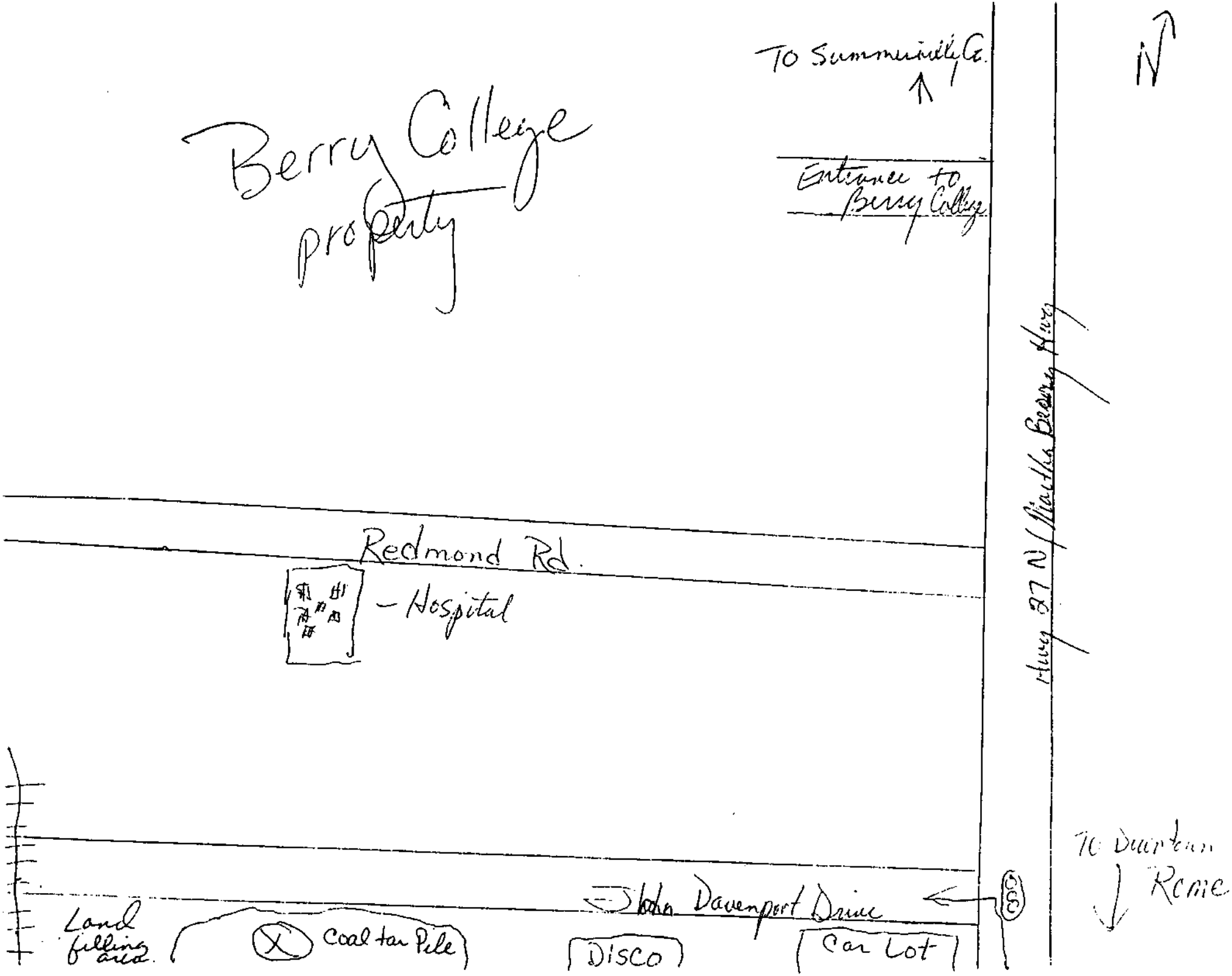
85° 11' 02.0" Long.

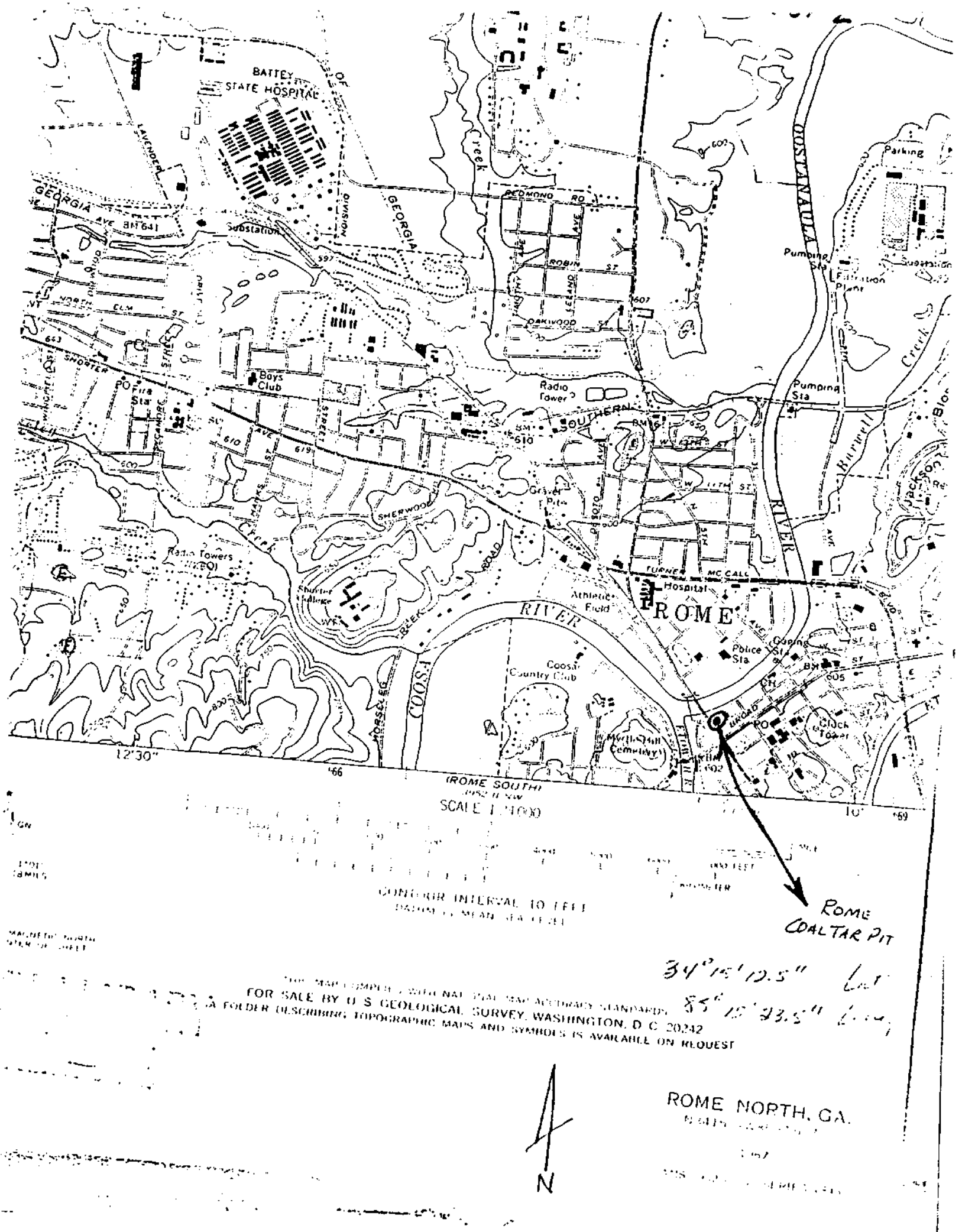
34° 16' 05.0" Lat.

ROME NORTH, GA.

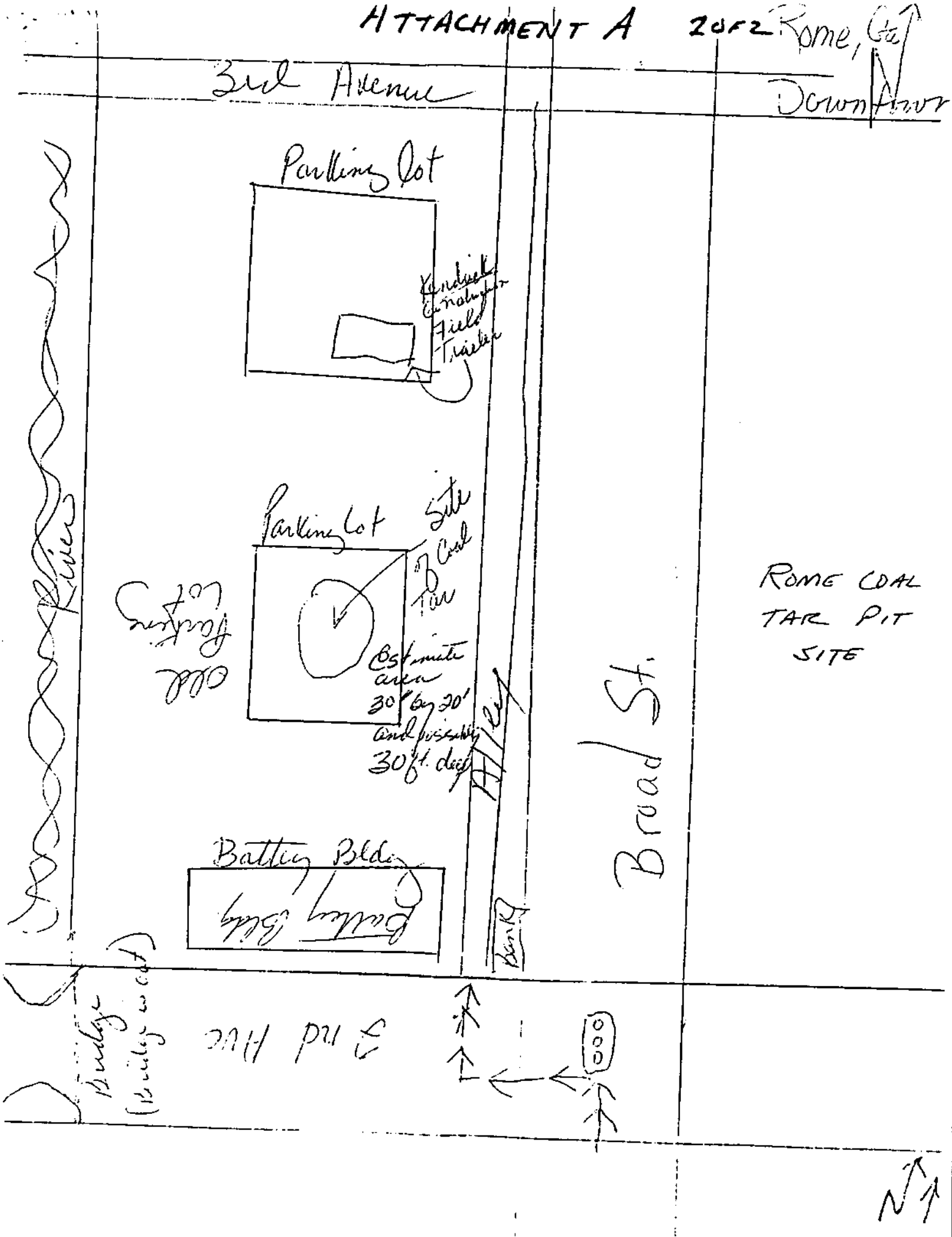
1967

FOR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D.C. 20242
OTHER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST


To Summerville Ga.
N
Berry College property
Entrance to Berry College
Hwy 27 N / Martha Berry Hwy
Redmond Rd.
- Hospital
To Downtown Rome
John Davenport Drive
Land filling area
Coal tar Pile
DISCO
Car Lot


BATTEY STATE HOSPITAL
GEORGIA AVE
Substation
REDMOND RD
ROBIN ST
OAKWOOD ST
NORTH ELM ST
SHORTER
Boys Club
Fire Sta
Radio Tower
SOUTHERN
Gravel Pits
SHERWOOD
Radio Towers
Shorter College
Athletic Field
TURNER MC CALL
Hospital
ROME
RIVER
COOSA
Coosa Country Club
Police Sta
Mt Hill Cemetery
Clock Tower
OOSTANAULA
Pumping Sta
Filtration Plant
Parking
Barwell Creek
Jackson
12'30"
(ROME SOUTH)
SCALE 1:24000
CONTOUR INTERVAL 10 FEET
ROME COALTAR PIT
34°15'12.5" Lat
85°15'23.5" Long
FOR SALE BY U S GEOLOGICAL SURVEY, WASHINGTON, D C 20242
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST
ROME NORTH, GA.
N

ATTACHMENT A 2 of 2 Rome, Ga



WESTON • SPER
Suite C, 4329 Memorial Drive
Decatur, GA 30032 • (404) 294-9110

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-6669

MEMORANDUM

TO: Sue Fields
EPA Region IV - Atlanta

THRU: John G. Cwiek
TATL Region IV - Atlanta

FROM: Lisa Burton
TAT Region IV - Atlanta

SUBJECT: Investigation/Assessment of E.C. Systems Site, Rome, GA.
TDD# 04-8504-14

DATE: April 30, 1985
TAT-04-F-00361

On April 24, 1985 TAT member Burton assisted OSC Fields in a field trip to E.C. Systems Site in Rome, GA. Air monitoring of the exposed coal tar pit and excavated material (2 different locations) was the major task performed. Using an OVA, less than 1 ppm was detected at both of these areas posing no air threat hazard. The tar pit and excavated material had been covered with fill dirt (clay). An estimation of approximately 15 trucks would be needed to transport the excavated material for disposal. The tar pit is located approximately 200 feet from the Coosa River.

A meeting will be held on April 25, 1985 with the responsible parties, GA EPD, and US EPA to determine if material is hazardous (through previous sampling) and what actions will be taken.

TABLE OF CONTENTS

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SECTION 6	EPA FACT SHEET
SECTION 7	COST SUMMARY
SECTION 8	PERSONNEL LOG

SECTION 1
OSC REPORT

OSC REPORT
ROME COAL TAR SITE
ROME, GEORGIA
MAY 16 - MAY 19, 1985

SUE FIELDS
ON-SCENE COORDINATOR

ROME COAL TAR SITE

The Rome Coal Tar Site is located at 102 West Second Avenue in downtown Rome, Georgia in Floyd County. The site was owned by several gas and utility companies from 1903 to 1942. Reportedly, coal gas was produced at the site using the carbonization process through the 1930's. Coal tar wastes from this process were left in a brick cylinder onsite. The cylinder was subsequently buried when the level of the city was raised 8 to 15 feet along the Oostanaula River. The cylinder is located approximately 250 feet from the Oostanaula River.

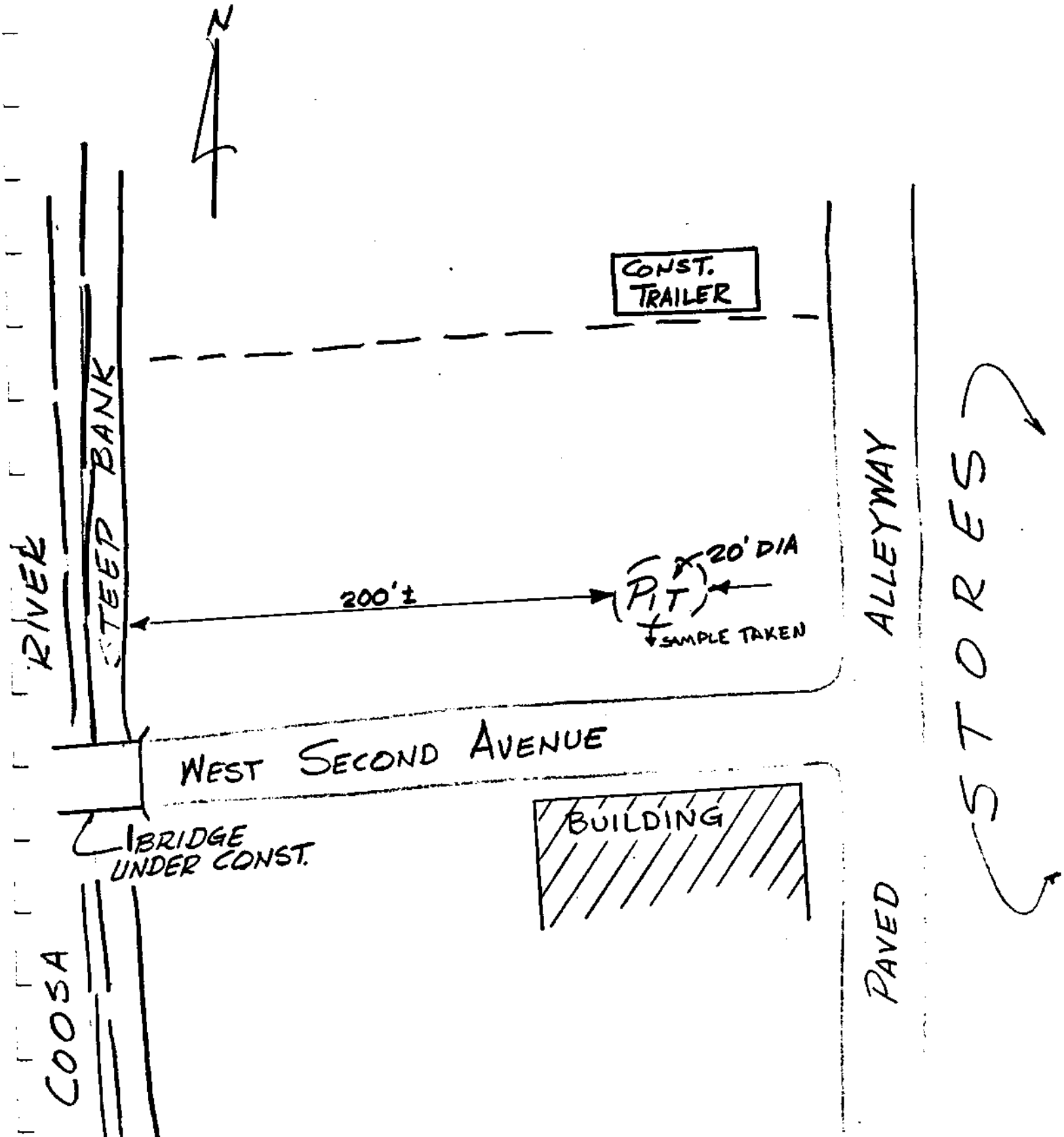
The property was purchased by a development firm in 1984 who planned to renovate two buildings onsite. The cylinder is located in what will be a parking area. During construction, the cylinder was unearthed, and approximately one half of the waste was mixed with clay and dumped outside of Rome off John Davenport Road. Construction debris was thrown into the waste remaining in the pit. The evening of the day the pit was uncovered, Rome's fire chief received numerous complaints about the odor. The fire department located the source of the odor and notified EPA on April 12, 1985. EPA personnel investigated the site later that day, and suggested covering the waste to mitigate the air pollution problem. After negotiations with the landowner failed, the Georgia Environmental Protection Division (EPD) asked EPA for Superfund assistance at the site. An Administrative Order was issued to the landowner, who declined to take any action. An immediate removal commenced onsite on May 16, 1985. Twelve tractor trailer loads of material were excavated from the cylinder. Due to a recent 2 inch rain at the site, accumulated rainwater in the cylinder had to be solidified with pozzalime. During excavation, no infiltration of groundwater was observed. To facilitate excavation of material from the 13 feet deep, 28 feet diameter cylinder, areas adjacent to it were excavated to lower the excavator. Black, odoriferous cinder-like material was discovered outside the walls of the cylinder. The construction contractor for the renovation project informed us that they had encountered this material throughout the whole lot from 8 feet to 12 feet deep. Due to logistics problems with the excavator, a small amount of material could not be excavated from the bottom of the cylinder. This amount is approximately 10 tons maximum. Several tons of pozzalime were placed in the bottom of the cylinder to help stabilize the remaining waste. The cylinder has a brick bottom which appears to be in tact. Eighteen loads of material were retrieved for disposal from the dumpsite off John Davenport Road. The project was completed on May 19 at an extramural cost of $93,000.

SECTION 2
PHOTOGRAPHS & DIAGRAMS

UNSCANNABLE

MEDIA

(PHOTOGRAPHS)



COAL TAR PIT SITE AREA
ROME, GEORGIA
MAY, 1986

SECTION 3
SAMPLING INFORMATION

HARMON ENGINEERING & TESTING

AUBURN INDUSTRIAL PARK, AUBURN, AL 36830-4399 (205) 821-9250

LABORATORY RESULTS

EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Attention: Mike Robel

HE&T PROJECT 623-05

DATE SAMPLE RECEIVED 4-19-85

DATE DATA TRANSMITTED 4-29-85

CLIENT JOB REFERENCE Sludge from Rome, Georgia

E.P. TOXICITY METALS

HE&T Sample Number	Client Sample Identification	As mg/L	Ba mg/L	Cd mg/L	Cr mg/L	Hg mg/L	Pb mg/L	Se mg/L	Ag mg/L
1587	Tar Sludge	0.02	<0.5	<0.02	0.06	<0.001	<0.02	<0.005	<0.02

		Corr. (pH) S.U.	Reactivity +or-	Ignitability °C	Phenols mg/kg	Total Cyanides mg/kg	Sulfides mg/kg	PCB mg/kg
1587	Tar Sludge	7	Neg.	>60	1678	5.9	<10	<10

Organic Analysis of Toluene Extract

		Component	Percentage Estimated of Extract
1587	Tar Sludge	Napthalene	40
		Fluoranthene	6
		Chrysene	15
		Acenapthylene	2
		Aliphatic/Other Hydrocarbons	Balance

Approved for Transmittal

Terence A. Whitt/MS

Laboratory Manager

SECTION 4
ACTION MEMO/SUPPORTING DOCUMENTS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

ACTION MEMORANDUM

SUBJECT: Immediate Removal Request for the Rome Coal Tar Site, Rome, Georgia - Action Memorandum

FROM: Sue Fields,
On-Scene Coordinator George Shelton, for

TO: Jack E. Ravan
Regional Administrator, Region IV

PURPOSE

A. This request is for authorization to proceed with an immediate removal of $100,000 at the Rome Coal Tar Site in Rome, GA. A significant threat to public health and the environment exists at this time and may worsen if response is delayed at this site.

BACKGROUND

A. Incident or Site Setting/Description:

1. Physical location - The site is located at 102 West Second Avenue in downtown Rome, Floyd County, Georgia.

2. General character of site - The site involves a concrete pit which holds waste from a facility which used the carbonization process to produce coal gas for the city of Rome 1890 to 1930. The pit was unearthed during a renovation project, and approximately one half of the material was mixed with soil and dumped outside of Rome off John Davenport Road. Construction debris was thrown on top of the sludge remaining in the pit.

3. Waste Management - Both the waste pit and the pile of excavated material off John Danvenport Road have been covered with soil to temporarily mitigate the air pollution problems the unearthed waste has caused.

4. Surrounding Areas - The waste pit is in downtown Rome, approximately 250 feet from the Oostanaula River and less than 100 feet from a retail shop/apartment complex which is scheduled to open in early June.

   The pile of excavated material is located along John Davenport Road, approximately 200 feet from Little Dry Creek and 100 feet from the roadway.

B. Quantity and Types of Substances Present:

The sludge material is approximately 50% polynuclear aromatic hydrocarbons (PNA's). The sludge is also contaminated with 1,700 ppm phenols. The volume in the pit is estimated at 160 cubic yards. The pile contains approximately 140 cubic yards of waste.

C. Is the site on the NPL? If so, when is later remedial action expected?

No.

THREAT

A. Threat of Exposure to Public or the Environment:

The waste pit downtown threatens a release to the Oostanaula River, and the pile outside Rome threatens the Little Dry Creek. Both locations present a threat to the public health due to inhalation and possible dermal exposure.

B. Evidence of Extent of Release:

The site was initially brought to our attention by Rome's fire chief who had received numerous complaints about odors emanating from the pit. Air pollution is still a problem at both locations.

C. Previous Actions to Abate Threat:

The pit and pile have been covered with soil as a temporary measure to reduce odors.

D. Current Actions to Abate Threat:

None.

ENFORCEMENT

See Attachment #1.

PROPOSED PROJECT AND COST

A. Objectives of the project:

To mitigate the threat to the public health and the environment posed by this site by removal and disposal of hazardous materials in the pit downtown and in the dump pile outside of Rome.

B.

Cleanup Contractors	$90,000
TAT costs	7,000
Intramural (HQ and Region)	3,000
TOTAL PROJECT CEILING	$100,000

C. Project Schedule:

The project shall commence as soon as final disposal for the material can be arranged. On site operations should be complete in two weeks.

D. If applicable, describe how actions will be consistent with remedial plan.

N/A

REGIONAL RECOMMENDATION

Because conditions at the Rome Coal Tar Site meet the NCP section 300.65 criteria for an immediate removal, I recommend your approval of the immediate removal request. The estimated total project costs are $100,000 of which $90,000 are for extramural cleanup contractor costs. You may indicate your approval or disapproval by signing below.

Approve: John A. Little Date: 5/14/85

Disapprove: _____ Date: _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

MAY 1 1985

4WD-ER

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. E. L. Yeargan, Jr.
President
Battey Machinery Company
2960 Calhoun Road, NE
Rome, Georgia 30161

Re: E. C. Systems, Inc. Property
Rome, Georgia 30161

Dear Mr. Yeargan:

The United States Environmental Protection Agency (EPA) is investigating the disposal of coal tar pitch on the above referenced property. According to our information, your company was the past owner of the property, and therefore may have information important to our investigation.

Under the provisions of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. §9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances.

Pursuant to these statutory provisions, you are hereby requested to answer the following questions, and forward all documents relating thereto to this office:

1. Did you at anytime own the parcel of property located at 102 West Second Avenue in Rome, Georgia? If so, from whom did you purchase or otherwise acquire the property? To whom and when did you sell or otherwise relinquish ownership of the property?

2. Do you have any information pertaining to disposal or storage of coal tar pitch on the property? If so, please describe the information which you have and the source of such information.

3. Provide copies of all documents relating to the disposal or storage of coal tar pitch on the property.

Your answers to these questions and documents relating thereto must be sent to EPA within twenty (20) days of receipt of this letter.

Under Section 3008 of RCRA, 42 U.S.C. §6928, failure to comply with this request may result in an order assessing civil penalties and requiring compliance. Failure to comply with this request under Section 104 of CERCLA may result in a civil enforcement action brought against you by EPA.

EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations. For any portion of the information submitted which is entitled to confidential treatment, a confidentiality claim may be asserted in accordance with 40 CFR Section 2.200, the information will be disclosed only to the extent, and by means of the procedures specified in 40 CFR Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

Because of the seriousness of this matter and attendant legal ramifications, EPA urges you to forward your written response within the twenty (20) days time span. Your response should be sent to:

Harold Taylor
Emergency Remedial and Response Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, NE
Atlanta, Georgia 30365
404/881-2930

Thank you for your prompt attention to this matter.

Sincerely yours,

Thomas W. Devine, Director
Waste Management Division

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S W
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER

May 9, 1985

Mr. Jack E. Ravan
Regional Administrator
EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Jack:

Members of my staff have recently investigated, jointly with EPA Region IV personnel, a site in Floyd County named the Rome I Coal Tar Pit. Analysis of the waste discovered buried there indicates a similarity to K087 waste as defined in Section 261.32 of the Federal RCRA regulations and the Georgia Rules for Hazardous Waste Management. Additionally, a portion of this waste was excavated by the local contractor on site and removed to another location identified as the John Davenport Drive site.

Given the fact that this waste is chemically and physically similar to K087 and since it contains significant amounts of the constituents for which K087 waste is listed in the regulations (naphthalene and phenol) we feel that the waste is hazardous. Since both site locations pose a potential threat to heavily populated areas and the Oostanaula River, we are requesting that EPA consider the use of "Superfund" resources to remove the waste from both locations and transport the material to a secure landfill.

My staff will continue its investigation into the history of the site and work with the responsible parties to complete a remedial site assessment and investigation into prior releases into soils and groundwater.

Please advise me if you need additional information or assistance.

Sincerely,

Harold J. Reheis

for J. Leonard Ledbetter
Commissioner

JLL:js:w036

HARMON ENGINEERING & TESTING

AUBURN INDUSTRIAL PARK, AUBURN, AL 36830-4399 (205) 821-9250

LABORATORY RESULTS

EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Attention: Mike Robel

HE&T PROJECT 623-05

DATE SAMPLE RECEIVED 4-19-85

DATE DATA TRANSMITTED 4-29-85

CLIENT JOB REFERENCE Sludge from Rome, Georgia

E.P. TOXICITY METALS

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Organic Analysis of Toluene Extract

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1587	Tar Sludge	Napthalene	40
		Fluoranthene	6
		Chrysene	15
		Acenapthylene	2
		Aliphatic/Other Hydrocarbons	Balance

Approved for Transmittal

Terence A. Whitt/MS

Laboratory Manager

HARMON ENGINEERING & TESTING
SCIENTISTS • ENGINEERS • CONSTRUCTORS
AUBURN INDUSTRIAL PARK AUBURN, ALA. 36830-4399
205 821-5250

April 29, 1985

Mr. Mike Robel
EC Systems, Inc.
Post Office Box 68
Roswell, GA 30077

Re: Analysis of Sludge from Rome, Georgia Project
HE&T Project No. 623-05

Dear Mr. Robel:

In accordance with the verbal instructions of Jim Kendrick, Harmon Engineering & Testing (HE&T) has completed the analysis of a sludge sample collected by Mr. Kendrick from the "tar pit" unearthed in Rome, Georgia. The data sheet is attached.

Testing was performed according to the State of Georgia Hazardous Waste Management Regulations given at 391-3-11.07. These tests showed that the hazardous waste characteristics of EP Toxicity, ignitability, reactivity and corrosivity were all negative.

Additional testing was done to determine if the waste contained any of the so-called "Appendix VIII" compounds. The sample was extracted in a soxhlet apparatus using toluene; this extraction was diluted and analyzed by gas chromatography mass spectroscopy (GCMS). The results indicated that the principal components of the sample were polynuclear aromatic hydrocarbons and aliphatic hydrocarbons. These results indicate that EPD can classify the waste as hazardous.

We are continuing to discuss this situation with soils engineering firm and can, if you desire, provide complete turnkey studies to meet the EPD requirements. If you have any questions, please feel free to call on us.

Sincerely,

HARMON ENGINEERING & TESTING

Mark Shearon
Vice President
Environmental Division

MS:vn

Enclosure

Harold Taylor

BATTEY MACHINERY CO.
INCORPORATED
SINCE 1901
INDUSTRIAL SUPPLIES
PLUMBING SUPPLIES
WHOLESALE ELECTRICAL SUPPLIES
P. O. Box 33 • Rome, Georgia 30162

EDMUND L. YEARGAN
President

May 15, 1985

Mr. Harold Taylor
Emergency Remedial and Response Branch
United States Environmental
Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: E. C. Systems, Inc. Property, Rome, Georgia

Dear Mr. Taylor:

Battey Machinery Company is in receipt of your letter dated May 1, 1985. In that letter you request certain information concerning the above-referenced property. Battey Machinery Company is more than willing to cooperate with your agency with regard to any inquiry it might wish to make. However, before responding, we want to state to you most emphatically that Battey Machinery Company has never generated, stored, treated, transported, disposed of or otherwise handled any of the substances to which your letter and inquires refer. In responding to your inquiry, we want to make our position plain in this matter.

In order to furnish you with the information as you have requested, we will respond to the individual questions as numbered by you.

1. The property which you refer to as the E. C. Systems, Inc. property includes property purchased from several sources. The property acquired from Battey Machinery Company was acquired by Battey Machinery Company over a number of years in separate parcels. The property upon which the coal tar pitch was found was acquired by Rome Municipal Gas Company by deed recorded in Floyd county Deed Book 000, Page 664 in 1903; Rome Municipal Gas Company conveyed the property to Georgia Public Utilities Company on June 30, 1928 by deed recorded in Deed Book 134, Page 373; Georgia Public Utilities Company merged into Atlanta Gas Light Company in a deed referring to that merger, dated

BATTEY MACHINERY CO.
SINCE 1901
INDUSTRIAL SUPPLIES
PLUMBING SUPPLIES
WHOLESALE ELECTRICAL SUPPLIES
P. O. Box 33 • Rome, Georgia 30162

EDMUND L. YEARGAN
President

March 18, 1941, is recorded in Deed Book 187, Page 59; the subject property was conveyed by Atlanta Gas Light Company to L.D. Yeargan (one of the founders of Battey Machinery Company) on March 6, 1942 and recorded in Floyd County Deed Book 192, Page 208; Mr. Yeargan conveyed the property to Mrs. L. D. Yeargan on March 24, 1944 by deed recorded in Deed Book 200, Page 94; Mrs. Yeargan conveyed the property to Battey Machinery Company on October 24, 1950, by deed recorded in Deed Book 246, Page 211. On July 23, 1984, Battey Machinery Company conveyed the subject property to E. C. Systems, Inc. by deed recorded in Deed Book 908, Page 221 of the Floyd County Deed Records. We understand E. C. Systems, Inc. formed several limited partnerships, conveyed various portions of the property into these various limited partnerships; and that the properties were conveyed to E. C. Systems, Inc. by the limited partnerships all within the last year.

2. Battey Machinery Company has no information pertaining to disposal or storage of coal tar pitch on any of this property. However, Battey Machinery Company, its officers and agents do know that neither Battey Machinery Company, L. D. Yeargan or Mrs. L. D. Yeargan have conducted any activities on the property which would involve generating, storing, treating, transporting or otherwise disposing of or handling this particular material. Battey Machinery Company and its officers and employees were not aware of the fact that coal tar pitch, or any other like substance, was stored or located on this property.

3. There are no documents such as you request.

We trust that this is the information which you have requested in your letter of May 1, 1985.

Very truly yours,

Ed L. Yeargan, Jr.

Ed Yeargan, Jr.

MAY 14 1985

4WD-ER

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Michael Wrobel
U. C. Systems, Inc.
Vice President, Properties
800 Mansell Road
Roswell Georgia 30077

Re Coal Tar Pit
102 West Second Avenue
Rome, Georgia

Dear Mr, Wrobel

Please find enclosed an Administrative Order requiring you to perform certain actions at the above referenced site. This Order is issued pursuant to Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. §9606. If you have any questions, please contact Robert W. Caplan of my staff at (404) 881-2641.

Sincerely yours,

Jack E. Ravan
Regional Administrator

Enclosure

cc Harold Echols
Georgia Environmental Protection Division

bcc Larry Weiner, OWPP
Marcia English, OPC
Bob Caplan - ORC
Sue Fields- IERB

4WD-EE	4WD-ER	4WD-FR	4ORC	4WD-ER	4WD-FR	WMD	4ERA	4PA
TAYLOR	COLE	FIELDS	CAPLAN	GREEN	SMITH	DEVINE	LITTLE	RAVAN

EEATLOR:pga 05-10-85

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV

IN THE MATTER OF: COAL TAR PIT WEST SECOND AVENUE and CONTAMINATED MATERIAL JOHN DAVENPORT ROAD ROME, GEORGIA E. C. SYSTEMS, INC. Respondent	)	DOCKET NO. 85-14-C

ORDER PURSUANT TO SECTION 106(a) OF THE
COMPREHENSIVE ENVIRONMENTAL RESPONSE,
COMPENSATION AND LIABILITY ACT, 42 U.S.C. §9606(a)

The following ORDER is issued to E. C. Systems, Inc., (Respondent) pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. §9606(a), and delegated to the Administrator of the Environmental Protection Agency (EPA) by Executive Order 12316 dated August 14, 1981, 46 Federal Register 42237 (1981) and further delegated to the Regional Administrator of Region IV, EPA. Notice of the issuance of this ORDER has been given to the State of Georgia.

EPA has determined that there may be an imminent and substantial endangerment to the public health and welfare and the environment due to the release and threat of a release of hazardous substances as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14) from the following locations (the "Sites"):

> An abandoned subterranean coal tar pit located on property at 102 West Second Avenue in Rome, Georgia, and contaminated excavated material which was hauled to an area off John Davenport Road in Rome, Georgia.

This ORDER directs you to undertake action to protect the public and the environment from the endangerment.

FINDINGS OF FACT

1. Respondent owns a parcel of land located at 102 West Second Avenue in Rome, Georgia.

2. During construction activities on the property on or about April 12, 1985, Respondent unearthed an abandoned subterranean coal tar pit. Several truck

loads of material from the pit were excavated and transported to an area off John Davenport Road outside of Rome. The coal tar pit located on the Respondent's property and the excavated material off John Davenport Road are hereinafter referred to as the "Sites".

3. After review of analysis of the waste, the Georgia Environmental Protection Division (EPD) has determined that the material in the coal tar pit, and the material which was excavated and dumped off John Davenport Road, are hazardous wastes due to the presence of phenols, naphthalene, fluoranthene, chrysene, acenapthylene, and other aliphatic hydrocarbons.

4. Phenol is a tumor promoter in laboratory animals. Dermal contact can result in corrosion of the skin. Inhalation causes central nervous system disorders such as weakness or dizziness, and edema in the lungs. Damage to the liver kidney, pancreas, and spleen have also been observed after inhalation. Ingestion causes gastrointestinal distress and corrosion of the lips, mouth, tongue, esophagus, and stomach.

5. Chrysene is a demonstrated carcinogen in laboratory animals.

6. The Sites are in a highly populated area. Access to the Sites is unrestricted and the wastes present on-site are not secured.

7. The pit located off Second Avenue in Rome is within two hundred feet of the Costanaula River. The material off John Davenport Road is within the drainage area of Little Dry Creek.

CONCLUSIONS OF LAW

1. Respondent is a person as defined in Section 101(21) of CERCLA, 42 U.S.C. §9601(21).

2. Respondent is an owner within the meaning of Section 101(20) of CERCLA, 42 U.S.C. §9601(20).

3. The Site is a facility within the meaning of Section 101(9) of CERCLA, 42 U.S.C. §9601(9).

4. The substances found on-site, including phenols, naphthalene, chrysene and fluoroanthene are "hazardous substances" as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

5. The presence of hazardous substances at the Sites, as well as their migration to surrounding soils and potential migration to groundwater and surface water, constitutes the release and threat of release within the meaning of Section 101(22) and 106(a) of CERCLA, 42 U.S.C. §9601(22) and §9606(a).

DETERMINATIONS

Based on the foregoing FINDINGS OF FACT AND CONCLUSIONS OF LAW, and the entire record of this proceeding, the Regional Administrator has determined that 1) The release and threat of release from the Sites may present an imminent and substantial endangerment to the public health or welfare or environment; 2) In order to protect public health and welfare or the environment, it is necessary that action be taken to mitigate the release and threat of release of hazardous substances from the Sites into the environment; and 3) The actions required in this ORDER are consistent with the National Contingency Plan.

ORDER

Based on the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW, AND DETERMINATIONS it is hereby ORDERED that.

1) Respondent shall initiate by no later than May 28, 1985, and complete within thirty (30) working days thereafter, the following measures, which shall be undertaken at the direction and approval of EPA through its On-Scene Coordinator (OSC) and consistent with the National Contingency Plan:

   a) Excavate all coal tar and contaminated soil from the pit located off West Second Avenue in Rome, Georgia.

   b) Transport and dispose of at an approved hazardous waste disposal facility, all excavated material and contaminated soil. This would include both the material removed from the pit and the material now stored off John Davenport Road.

2. All actions carried out by Respondent pursuant to this ORDER shall be done in accordance with all applicable federal, state, and local laws.

3. Upon request, Respondent will provide EPA with split samples of any samples collected in accordance with the requirements of this ORDER.

4. All response work performed pursuant to this ORDER shall be under the direction and supervision of a qualified professional engineer or certified geologist with expertise and experience in hazardous waste site cleanup. Respondent shall notify EPA as to the name and address of such engineer or geologist and of any contractors and subcontractors to be used in carrying out the terms of this ORDER in advance of their involvement at the Sites.

5. Respondent shall consult with EPA in planning for sampling and analysis. Respondent shall provide a quality control report to EPA certifying that all activities have been performed as approved.

6. Access to the Sites shall be provided to EPA employees, its contractors, and consultants for the purpose of carrying out any necessary actions related to this removal action.

7. Nothing herein shall constitute or be construed as a satisfaction or release from liability for any conditions or claims arising as a result past, current or future operations or ownership of the Sites by the Respondent, his agents, contractors, lessees, successors, or assigns.

8. Notwithstanding compliance with the terms of this ORDER, Respondent may be required to take further actions as necessary to abate the endangerment posed by conditions at the Sites.

9. In the event that the OSC determines that activities implemented under this ORDER, or any other circumstances or activities are creating an imminent and substantial endangerment to the health and welfare of the people on the Sites or in the surrounding area or to the environment, the Regional Administrator of EPA, Region IV, may order Respondent to halt further implementation of this ORDER for such period of time as necessary to abate the endangerment.

10. The United States shall not be liable for any injuries or damages to persons or property resulting from acts or omissions by the Respondent, his employees, agents, or contractors in carrying out activities pursuant to this ORDER, nor shall the federal government be held as a party to any contract entered into by the Respondent or his agents in carrying out activities pursuant to this ORDER.

11. All submittals and notifications to EPA pursuant to this ORDER shall be made to Mr. Thomas W. Devine, Director, Waste Management Division, U. S. Environmental Protection Agency, 345 Courtland Street, N.E., Atlanta, Georgia 30365, and Mr. Robert W. Caplan, Office of Regional Counsel, at the same address.

12. This ORDER is effective upon receipt notwithstanding any conference requested by Respondent.

13. This ORDER shall apply to and be binding upon the parties to this action, their officers, directors, agents, employees, successors, assigns, and contractors.

OPPORTUNITY FOR CONFERENCE

Except as provided below, this ORDER is effective upon receipt. With respect to those actions required above you must notify EPA by telegram or by telephone within two (2) days after receipt of this Order, with follow-up written confirmation, within forty-eight (48) hours of initial notice whether you intend to comply with the terms of this ORDER. In addition, if you wish to confer with EPA to discuss this Order, its applicability to you, the correctness of any factual determinations upon which the ORDER is based, the appropriateness of any action which you are ordered to take, and any other relevant and material issue, you may request an informal conference at the EPA Regional Office located at 345 Courtland

Street, N.E., Atlanta, Georgia. Such a request must be made by telegram or by telephone within two (2) days after receipt of this ORDER. Respondent may appear in person or by attorney or other representative at any conference held at his request. However, you are hereby placed on notice that, notwithstanding any request for a conference, EPA will take any action which may be necessary in the opinion of EPA for the protection of public health and welfare and the environment, and that Respondent may be liable under Section 107(a) of CERCLA, 42 U.S.C. §9607, for the costs of those actions. Any request for a conference should be made to:

Mr. Harold Taylor
Waste Management Division
Emergency & Remedial Response Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
(404) 881-2930

or

Mr. Robert W. Caplan
Office of the Regional Counsel
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
(404) 881-2641

VIOLATIONS OF ORDER

Violation of this ORDER by the Respondent through willful violation or failure or refusal to comply with this ORDER, or any portion thereof, may subject you to a civil penalty of up to $5,000 for each day in which such violation occurs or such failure to comply continues pursuant to Section 106(b) of CERCLA, 42 U.S.C. §9606(b). Failure to comply may also subject Respondent to civil penalties and/or punitive damages in an amount of three times the amount of any costs incurred by the United States as a result of such failure, as provided in Section 106(b) and 107(c)(3) of CERCLA, 43 U.S.C. §9606(b) and §9607(c)(3). Nothing herein shall preclude EPA from taking such other actions as may be necessary to protect the public health and welfare or the environment and recovering the costs thereof.

DATE: _____ BY: _____
JACK E. RAVAN
REGIONAL ADMINISTRATOR

HEAVIOR.pga:05-10-85

ACTION MEMORANDUM

DATE: MAY 23 1985

SUBJECT: Immediate Removal Funding Increase Request for an Immediate Removal Action at the Rome Coal Tar Site in Rome, GA.

FROM: Sue Fields
On-Scene Coordinator

TO: Jack E. Ravan
Regional Administrator

ISSUE

This request is for additional funding in the amount of $10,000 for the immediate removal action at the Rome Coal Tar Site in Rome, GA.

DISCUSSION

On May 14, 1985, funding was authorized for an immediate removal action at the Rome Coal Tar Site in Rome, GA in the amount of $100,000 which included $10,000 for intramural cost.

Onsite activities were completed at the site on 5/19. However, it is anticipated that the await bills for transporation and disposal of the material will exceed the current project ceiling of $90,000. This will occur because some of the waste was mixed with clay (before EPA involvement) which caused the waste to be much denser that anticipated. Therefore, the tonnage of waste which was transported for disposal was higher than estimated originally.

For this reason, I am requesting that the ceiling for expenditures for the immediate removal project be increased to $110,000, which includes $10,000 for intramural costs to mitigate the threat posed to public health and the environment posed by the Rome Coal Tar Site in Rome, GA.

Approve: /s/ John A. Little
Deputy Regional Administrator Date: MAY 23 1985

Disapprove: _____ Date: _____

SECTION 5
POLREPS

POLREP #1

DATE: May 23, 1985

SUBJECT: POLREP #1 - Rome Coal Tar Site, Rome, GA.

FROM: Sue Fields/OSC Region IV

TO: Tim Fields/ERD

Situation:

After the landowner declined to reply to an Administrative Order issued by by EPA, immediate removal activities were initiated at the Rome Coal Tar site. A total of 659.5 tons of coal tar waste and contaminated soil were excavated and transported to the CWM facility in Emelle, AL for disposal. The removal ran from 5/16 to 5/19. Due to a denser than expected waste, it is anticipated that transportation and disposal costs will exceed the current extramural ceiling of $90,000 for P.O. #6859-04-064. Therefore, a request for ceiling increase has been submitted to raise, the total ceiling to $110,000 of which $100,000 are for extramural costs.

SECTION 6
EPA FACT SHEET

United States
Environmental Protection
Agency

Region 4
Office of Public Affairs
345 Courtland Street, NE
Atlanta, GA 30365

Alabama
Florida
Georgia
Kentucky

Mississippi
North Carolina
South Carolina
Tennessee

EPA Environmental News

(404) 881-3004

May 16, 1985

Lucy Justus, Georgia EPD
404/656-6905

Charlis Thompson, EPA
404/881-3004

FOR IMMEDIATE RELEASE

At the request of the Georgia Environmental Protection Division (EPD), the U.S. Environmental Protection Agency (EPA) will begin a cleanup of hazardous wastes on Thursday, May 16 at a coal tar pit in Rome, GA.

The site, located at 102 West Second Avenue, consists of a pit containing waste from a facility involved in producing coal gas for the City of Rome from 1890 to 1930. The pit was unearthed during a renovation project, and approximately one-half of the material was mixed with soil and dumped outside of Rome off John Davenport Road. Construction debris was thrown on top of the sludge remaining in the pit.

Both the waste pit on West Second Avenue and the pile of excavated material off John Davenport Road are contaminated with coal tar derivatives and phenol. Coal tar is a known carcinogen and is toxic by inhalation. Phenol, an irritant to tissue, is toxic by ingestion, inhalation and skin absorption.

The cleanup will involve the removal and transportation of the sludge and contaminated soil to an approved disposal facility.

-more-

The Georgia EPD will provide monitoring at the site after the cleanup is complete to assess any possible impact on water or the environment in general.

The project will be financed with money from the federal Superfund administered by the EPA.

The Superfund, totaling $1.6 billion is designed to protect human health and the environment by providing money for cleanup of abandoned hazardous waste sites and spills of hazardous substances.

The fund is authorized under the Comprehensive Environmental Response, Compensation and Liability Act of 1980.

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SECTION 7
COST SUMMARY

ROME COAL TAR SITE COST SUMMARY

PERSONNEL	$ 7,855.00	
EQUIPMENT & MATERIALS	$ 9,263.89	
SUBCONTRACTOR	$ 1,349.50	
TRANSPORTATION & DISPOSAL	$ 76,901.99	
TOTAL	$ 95,370.28	$ 95,370.28
CEILING COST	$100,000.00	
COST OF PROJECT	$ 95,370.28	
	$ 4,629.72	
TAT COST:		
LABOR	$ 1,596.00	
TRAVEL/PER DIEM	$ 350.00	
TOTAL	$ 1,946.00	$ 1,946.00

INCIDENT OBLIGATION LOG

(1) Incident Name or Site Number Rome Tar Coal Site

(2) Total Amount Approved $ 90,000.00

(3) Description of Obligation (Vendor Name)	(4) Document Control Number	(5) Date	(6) Amount	(7) Balance
HARTECH	6859-04-064	5/15	1005.00	88,995.00
		5/16	3888.59	85,106.41
		5/17	3629.30	81,477.11
		5/18	4212.80	77,264.31
		5/19	3693.10	73,571.21
		5/20	857.50	72,713.71
	Increase of $10,000.00	7/15		82,713.71
		7/15	1113.00	81,600.71
				81,600.71
	(Checked by Invoice & On Cost Summary)		T&D:	76,901.99
				4698.72
			Adjustments:	69.00
				4629.72

SECTION 8
PERSONNEL LOG

PERSONNEL LOG

U.S. EPA
Region 4
345 Courtland Street, NE
Atlanta, GA 30365
404/881-2216
Sue Fields, OSC

GA. Department of Natural Resources
E.P.D.
270 Washington Street, SW
Atlanta, GA 30334
404/656-7802
Claude Goodley

Roy F. Weston, Inc.
SPER
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Decatur, GA. 30032
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Lisa M. Burton, TAT

Hazardous Waste Technology
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Decatur, GA. 30035-4013
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E.L. Yeargan, Jr. President

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P.O. Box 337
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404/235-8797
Jim Kendrick, President
J.C. Sizemore, Foreman

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SAFETY PLAN

ROME COAL TAR SITE

ROME, GA

TDD# 04-8505-05

ALTERATION OF SITE SAFETY PROGRAM

The OSC has the authority to alter any or all parts of the Site Safety Program to satisfy the requirement for site safety based on EPA's Interim Standard Operating Safety Guidelines (Revised, September 1982). Any re-evaluation of the procedures set forth in this Plan will be made after the initial on-site survey by support personnel and review of data collected as a result. Subsequent changes in the site characteristics and/or site operations and procedures may require further evaluation and amendments to the Plan during the course of this project. All amendments to this plan will be made in accordance with EPA's Interim Standard Operating Safety Guidelines and NIOSH and OSHA standards (29 CFR 1910).

1.0 INTRODUCTION

The highest priority during the federally sponsored cleanup (CERCLA) of the site will be safety. The U.S. Environmental Protection Agency/WESTON SPER (TAT) has formulated the Site Safety Program to prevent exposure to hazardous materials by personnel participating in the project. Strict adherence to the policies and procedures established in this plan will assure its safe completion.

2.0 SITE SAFETY MANAGEMENT STRUCTURE

EPA/WESTON has defined a need to create within the management structure of the project two positions which will be dedicated to the administration and monitoring of the Site Safety Program. The Project Safety Officer will have the overall responsibility for site safety; while the Site Safety Officer will be charged with the task of day-to-day monitoring of the safety program at the site.

2.1 Project Safety Officer (PSO) - EPA/OSC

The safety program quality control will be maintained through review of project activity reports and visits made by the Project Safety Officer. The PSO will monitor general safety operating procedures, ensure that the personnel monitoring program is being carried out correctly, and verify that the results of these tests are being interpreted accurately. The PSO will institute corrective action in any instance where it may be necessary.

Principal duties of the Project Safety Officer:

- o Assistance in the initial site hazard analysis;
- o Review and approval of safety plans;
- o Quality control of the safety program throughout the duration of the project.

2.2 Site Safety Officer (SSO) - TAT

The Site Safety Officer will administer the safety program at the site on a day-to-day basis. This duty involves supervision of the cleanup operation operation to ensure that it is being conducted in a safe manner. He is responsible for making sure that all safety regulations are adhered to by persons entering the work site. The SSO will have the authority to stop dangerous activities at the site at any time he feels that there is a real danger to personnel safety and health.

Specific duties of the Site Safety Officer:

- o Administer and enforce site safety plan;
- o With the Project Safety Officer, oversee the mobilization of equipment, conduct initial site survey, monitor site preparation and decontamination procedures;

- o Obtain and interpret instrument readings for the purpose of monitoring conditions of the site;

- o Determine levels of protection needed on a daily basis;

- o Conduct safety briefings as appropriate;

3.0 SITE SAFETY ZONES AND SITE ACCESS

3.1 Objective.

Specific areas of operation must be delineated to prevent the uncontrolled entrance or exit of personnel and site visitors.

3.2 Purpose

All management of personnel and visitors on a hazardous waste site must be strictly controlled. Due to the potential for chemical dangers and the rapidity of equipment movement around the site, it is imperative that personnel location and movement be strictly supervised.

3.3 Procedure

The EPA/WESTON team has developed a site safety zone plan. This site safety zone is composed of three zones.

Zone 1 (Exclusion Zone) - This area is where the active cleanup operations will take place. All personnel entering this zone will do so from the decontamination/equipment supply area. They will don the appropriate safety equipment as specified by the Site Safety Officer (SSO) and will exit through the decontamination unit following the prescribed decontamination procedure under the observation of the SSO.

Zone 2 (Contamination Reduction Zone) - This area is where decontamination procedures for personnel and equipment will take place. See Sections 11.0 and 12.0.

Zone 3 (Support Zone) - This area is designated as the clean zone. All personnel and equipment entering this zone from Zones 1 & 2 will have undergone the decontamination procedures prescribed by the SSO. The command post/decontamination trailer will be situated in this zone.

3.4 SITE ACCESS

Access to the site will be controlled in the following manner:

- o Only personnel having duties in the work area that will be permitted to enter. Completion of a site safety training session is a prerequisite for entry.

- o All personnel will enter and exit the work area (Zones 1) via Zone 2.

- In addition to complying with decontamination procedures, personnel will be logged in and out.

- All persons working in Zones 1 will work in teams, be in continuous visual contact and radio or voice communication.

- Increased police surveillance of the area will be requested during the period.

4.0 SITE SAFETY TRAINING

4.1 Objective

To familiarize project participants with the site specific hazards to be encountered and safety precautions to be instituted at the site.

4.2 Purpose

Before project participants enter the work area, they must be familiar with the hazards associated with working at that site. Further, they should also be fully aware of the safety policies and procedures to be observed during the field operation phases.

4.3 Procedure

The EPA/WESTON team will provide to all project participants a safety training session for this site. This safety training session will be conducted by the Site Safety Officer. Among other categories as may be warranted the session will cover as appropriate.

- Respiratory Protection Program
- Hazardous Materials Field Procedures
- Hazardous Materials Recognition
- Safety Equipment Selection
- Decontamination Procedures
- Sample Collection
- Respiratory Training
- Self-Contained Breathing Apparatus
- Evacuation Procedures
- Internal and External Communications

4.4 Local Resource Training

During the course of the work activities at the site, the site management team may require the services of one of many local agencies. Therefore, a pre-mobilization meeting will be held to discuss anticipated health and safety hazards at the site.

5.0 INITIAL SITE AIR MONITORING SURVEY

Prior to the initiation of any field work at the site, an air monitoring site survey will be conducted by the Project Safety Officer and/or the Site Safety Officer. Real-time air monitoring will be performed utilizing appropriate instrumentation. Based upon data obtained from the initial survey, the SSO will make a determination on proper location of command post/decontamination trailer. Further, this data will permit the SSO to make judgements as to delineation of exclusion zone, contamination-reduction zone.

6.0 HAZARD ANALYSIS AND DESIGNATION OF ACTION LEVELS

6.1 Objective

Hazards associated with the cleanup operation must be identified and quantified and their impacts on operation must be evaluated.

6.2 Purpose

Establishment of the hazard levels present at the site will provide criteria for the Site Safety Officer's determination of proper safety dress and safety procedures of the day. The hazard analysis will serve as a guide post in determining daily worker protection levels.

6.3 Procedure

The hazard analysis will involve a review of all available published and unpublished reports, preliminary air analysis, and initial site sampling information. Action levels for controlling worker exposure to the site hazards will result from this investigation. Action levels are as follows:

Known wastes - no air hazard	Level D
0 - 5 ppm above background	Level C
5 - 500 ppm above background	Level B
500 - 1000 ppm above background	Level A

Descriptions of Levels A, B and C are found in Sections 7.1, 7.2 and 7.3.

7.0 LEVELS OF PROTECTION

7.1 Level A

Level A protection will be selected when the highest available level of both respiratory, skin, and eye contact protection is needed.

Personal Protection Equipment

- Positive Pressure SCBA (MESA/NIOSH approved)
- Totally Encapsulating Suits (boots and gloves attached)
- Gloves - Inner (tight fitting and chemical resistant)
- Boots - Chemical protective, steel toe and shank. Depending on suit boot construction; worn over suit boot.
- Gloves - outer, chemical protection. Depending on suit construction worn over suit gloves. May be replaced with tight-fitting, chemical resistant goves worn inside suit gloves.
- Underwear, cotton, long-john type
- Hard Hat (under suit)
- Disposal protective suit, gloves and boots. (Worn under or over encapsulating suit)
- Coveralls (under suit)
- 2-way radio communications

Criteria for selection of personal protective equipment (other than standard issue, i.e., hard hats, etc.)

Criteria for Use

- When type(s) and concentration(s) of toxic substances are known and require the highest level of combined protection to the respiratory tract, skin and eyes. These conditions would be:

- Atmospheres which are "immediately dangerous to life and health" (IDLH). IDLH's can be found in the NIOSH/OSHA's "Pocket Guide to Chemical Hazards" and/or other references.

- Known atmospheres or potential situations that would affect the skin or eyes, or could be absorbed into the body through these surfaces.

- Potential situations are those where vapors may be generated or splashing occurs through site activities.

- Standard reference books should be consulted to obtain concentrations hazardous to skin, eyes or mucous membranes.

- Oxygen deficient atmospheres with the above conditions.

- When the type(s) and/or potential concentration(s) of toxic substances are unknown.

Contradictions might be:

- Environmental measurements contiguous to the site.
- Reliable, accurate historical data.
- Open, unconfined areas.
- Minimal probability of vapors present or splashing with cutaneous or subcutaneous affecting substances.
- Total vapor readings indicate 500 ppm to 1,000 ppm.

7.2 Level B

Level B protection will be selected when the highest level of respiratory protection is needed, but cutaneous or precutaneous exposure to the small unprotected areas of the body (i.e., neck and back of head) is unlikely, or where concentrations are known within acceptable exposure standards

Personal Protective Equipment

- Positive Pressure (SCBA (MESA/NIOSH approved)
- Two-piece chemical resistant suit
- Coveralls (fire resistant) under splash suit
- Gloves - Outer, chemical protective
- Gloves - Inner, tight fitting, chemical resistant
- Boots - Outer (chemical protective heavy rubber throw-aways)
- Hard hat
- Face shield

Criteria for Use

- When the type(s) and concentration(s) of hazardous substances are known and require the highest degree of respiratory protection; but a lower level of skin and eye protection is required.

- Atmospheres with concentrations of known substances greater than protection factors associated with full-face, air-purifying respirators with appropriate cartridges.

- Atmospheres with less than 19.5 percent oxygen.

- Type(s) and concentration(s) of vapors in air do not present a cutaneous or percutaneous hazard to the small, unprotected areas of the body.

- A determination is made that potential exposure to the body parts not protected by a fully-encapsulating suit (primarily neck, ears, etc.) is highly unlikely.

- Known absence of cutaneous or percutaneous hazards or others.

- Activities performed preclude splashing of individuals.

- Total vapor levels range from 5 ppm - 500 ppm on instruments such as OVA or HNU and does not contain high levels of toxic substances affecting skin or eyes.

- Level B protection is recommended as the lowest level of protection for initial entries until the hazards have been further identified and defined by monitoring, sampling, and other reliable methods of analysis, and personnel protection equipment commensurate with these findings utilized.

7.3 Level C

Level C protection will be selected when the type(s) and concentration(s) of respirable material is known, or reasonably assumed to be not greater than the protection factors associated with air-purifying respirators; and exposure to the few unprotected areas of the body (i.e., neck and back of head) is unlikely to cause harm.

Personal protective Equipment

- Full face, or half face, air purifying respirator (MESA/NIOSH approved)
- Chemical resistant clothing, as appropriate
- Heavy rubber boots
- Hooded 2-piece chemical splashsuits, when applicable - hooded disposal coveralls
- Gloves - outer (chemical protective)
- Gloves - inner (surgical type)
- Escape mask
- Hard hat/face shield as appropriate

7.4 Level D

Level D protection will be selected when the measurements of atmospheric concentrations are below background. The protection factors are hard hats, goggles, steel toed boots, and overalls.

8.0 DETERMINATION OF PROPER SAFETY EQUIPMENT

8.1 Objective

The proper safety equipment must be chosen before personnel enter the site. There must be a clearly defined decision process.

8.2 Purpose

Before personnel enter the work area, they must wear the proper safety equipment. For the initial entry to the site, the level of protection will be Level B. If substantiated by real-time (OVA, HNU and explosimeter) and data, the level of protection may be downgraded to the appropriate level.

8.3 Procedure

The EPA/WESTON team will use the following decision tree.

1. The Site Safety Officer (SSO) and the Project Safety Officer will review all pertinent historical data, operating records and practices, and any associated analytical data. From this information and using Section 10.0 (Respiratory Protection Program), an initial schedule of required safety equipment will be generated and implemented on the site.

- Solicitation of employee input on the safety of the operation.

- An analysis on any site accidents, should any occur, in order to ensure that they do not re-occur.

2. The SSO will inspect the work site daily. This is done to confirm that proper safety equipment is being used.

3. If the monitoring data and the site inspections by the SSO do not indicate the need for a change in safety equipment all site personnel will continue to operate under the present guidelines.

4. If daily monitoring results indicate the need for a higher level of protecton, the SSO will immediately direct all site personnel to wear this increased level of protection. The SSO will then consult the PSO as to the change in safety equipment and the reasons for this change. The PSO will then direct the SSO to alter the safety equipment requirements.

6. If the daily monitoring reveals that a lower level of protection will be sufficient, the SSO will then consult the PSO to relay the analytical results and the recommended level of protection. The PSO will have ultimate responsibility for any downgrading of safety equipment requirements.

7. If site personnel encounter situations which would require increased levels of protection or if active site conditions change, site personnel can request a higher level of protection from the SSO. The SSO will immediately order the higher level of protection for all site personnel. The SSO will then consult the PSO and the PSO will alter the preset safety equipment requirements if he deems it necessary.

9.0 SAFETY EQUIPMENT

9.1 Objective

All personnel entering the work area will have available all the necessary safety equipment to meet any anticipated hazard that may arise at the job site.

9.2 Purpose

All site personnel must be adequately protected from potential health and safety hazards. All State and Federal work protocols must also be met. A sufficient and diverse inventory of all safety equipment necessary to meet anticipated hazards will be available to all employees. The personnel and any site visitors must be instructed in the proper use of this equipment before entry to the work area is permitted.

9.3 Procedures

The following personal protection and safety equipment will be supplied and kept in sufficient supply to meet the job requirements and allow site inspections by all authorized personnel.

Respiratory Protection Equipment Usage Criteria

1. Users will have been medically approved to use such equipment.
2. Users will be fit-tested utilizing the negative pressure, positive pressure and smoke testing.
3. Users will have been trained in the use, selection, limitations and maintenance of the equipment.
4. Workers will be familiar with the written procedures for use of respirators (full face, air purifying respirator (MESA/NIOSH approved) and half-faced cartridge mask.
5. Equipment will be issued to individuals for their personal use.
6. Equipment will be inspected before each use, during post-use cleaning and periodically.
7. Respirators will be cleaned and disinfected after each day's use or more if necessary.
8. Respirators will be stored in a convenient, clean and sanitary location.
9. Respirators in use will only be those with NIOSH/MESA approvals.
10. Respirators in use will be selected in accordance with the guidance of the American National Standard Practices for Respiratory Protection Z88.2-1980.
11. Air quality will meet the requirements for Grade D breathing air as described in Compressed Gas Association Commodity Specification G-7.1-1966.
12. Air cylinders in use will have been tested in accordance with the Shipping Container Specification Regulations of the Department of Transportation.
13. Air cylinders will be marked in accordance with American National Standard Method of Marking Portable Compressed Gas Containers to Identify the Material Contained 248.1-1954.

14. In areas where the respirator wearer, with failure of the respirator, could be overcome by a toxic or oxygen deficient atmosphere, at least one additional worker will be present, (the Buddy System) communications between workers will be maintained and the additional worker will be positioned so as to be unaffected by any incident and will have the proper rescue equipment to be able to assist others.

Body Protection

1. If the hazard present is known to be minimal or simply a nuisance then minimal protection is warranted. This will be in the form of garments such as Tyvek which are disposable.

2. For body protection against chemical splash and toxic vapors/gases, there will be a variety of protective clothing available ranging from coveralls to fully encapsulating suits.

3. As the hazard to the body becomes more serious the level of needed protection increases. A splashsuit made of PVC will be used if we encounter chemical liquid hazards such as acids or bases when there is minimal chance for direct contact.

4. In the event that the materials being encountered are more toxic in effect, then more substantial protection will be utilized in the form of splashsuits made of butyl rubber or neoprene.

5. In the event of encountering high levels of vapors/gases, or the possibility of skin contact with liquids that are toxic via percutaneous absorption, then fully encapsulating suits will be used in connection with supplied air or self-contained breathing apparatus.

Foot Protection

1. Footwear worn during on-site activities will have steel toes and steel shanks. Footwear will meet the specifications of ANSI Z41.1-1969.

2. For protection against liquid hazards, boots of neoprene, PVC, butyl rubber or natural rubber depending on the nature of the hazardous chemical encountered and its ability to permeate various materials will be worn .

3. In the event of the need for decontamination, disposable, pullover boots will also be used.

4. Pant legs will be worn outside of boots to prevent spillage into boots.

Hand Protection

1. The hands are as susceptible to contamination as feet. Gloves selected for use will be strong and resist puncturing, tearing and provide the necessary chemical resistance depending on the chemicals anticipated to be encountered.

2. There are a great variety of materials used in the manufacture of gloves. The materials previously discussed are also applicable to gloves.

3. Jacket cuffs will be worn over glove cuffs to prevent any liquid from spilling into the gloves. If hands are elevated above the head during work activity then the gloves will be sealed with tape to the coveralls or splashsuits.

4. Gloves will be selected, for various situations, taking into consideration length of cuff, thickness in relation to degree of protection afforded and thickness effects on manual dexterity.

Safety Glasses

1. Safety glasses, goggles or face shields will be included as standard safety gear for each member of the site crew.

2. Safety glasses will meet the specifications Z87.1-1968.

Head Protection

1. Hard hats will be worn in all work operations.

2. Hard hats will meet ANSI 289-1-1969 specifications for protection.

3. Face shields or cold weather liners will be affixed to hard hats as needed.

10.0 RESPIRATORY PROTECTION PROGRAM

10.1 Objective

Worker protection from the detrimental effects of any vapors generated or released during cleanup operation.

10.2 Purpose

A respiratory protection program will be instituted to protect the health and well-being of the employees. The training program will educate site personnel in the proper use of respiratory equipment and protective levels for vapors which might be encountered during the cleanup operation. This program will be administered by the Site Safety Officer. On-site air monitoring will be performed to ensure that the proper safety equipment is being used. Instruction will also be supplied to workers in the proper operation of the respiratory equipment.

10.3 Procedure

The Respiratory Protection Program will include the following items however, additional items may be added if deemed necessary by the Site Safety Officer.

- The Site Safety Officer will perform an initial determination as to exactly which employees and what levels of respiratory protection are necessary for the site safety zones. They will use the procedures outlined under Section 6.0 to predict the level of protection necessary.

- Real-time air monitoring will be conducted on a routine basis using applicable instrumentation to determine the concentration of airborne contamination.

- Only NIOSH approved respirators will be used. Respirators will be selected according to the OSHA and ANSI standards as well as worst-case conditions anticipated for each particular work period.

- Instruction and Training

  Medical Approval: Prior to work on site, approval will be obtained for employees to use a respirator from a qualified physician. This is to ensure that the employees are not suffering from a respiratory disorder which could be aggravated by the wearing of a respirator.

  Respirator Fitting: The Site Safety Officer will verify the fit testing certifications.

  Employee Instruction: The users will be instructed as to the usage, limitations, and cleaning procedure of the respirator before they are allowed to start work at the site. Site personnel will be advised as to the type of air contaminant they are being protected against for each day of the operation.

- Employees will be responsible for insuring that the respirator is properly cleaned and stored after each day of use.

- Air-line or SCBA respiratory equipment will be inspected on a routine basis. Spare cylinders for this equipment will be kept on site.

- When entering an enclosed area, vessel, pit, trench, etc. the following steps will be taken:

  Testing prior to and during entry

  1) Test of oxygen level
  2) Test for the lower explosive limit (LEL)
  3) Test for total organic vapor concentrations

Standby personnel will be present with approved rescue equipment, i.e., harnesses, safety lines, self-contained breathing apparatus, etc.

Documentation of respirator use is important. All users of respirators will be properly fitted and instructed on the care and use of the respirator.

11.0 PERSONNEL AND CLOTHING DECONTAMINATION PROCEDURES

11.1 Objective

To insure the proper and safe decontamination of all employees that are exposed to any form of contamination while working on this job site.

11.2 Purpose

Personnel decontamination procedures for all possible exposures to chemical and physical hazards during the course of this project must be prepared and implemented.

11.3 Procedures

All decontamination activity will be administered by the Project Safety Officer or the Site Safety Officer. All personnel will be instructed as to the proper decontamination procedures for this operation. All personnel will review the decontamination area set-up, making themselves familiar with the location of all necessary equipment.

The following decontamination procedure is designed for general decontamination and may be modified in response to the level of contamination the worker was exposed to during the day and suitable substitute equipment that may be available.

MAXIMUM PERSONNEL DECONTAMINATION PROCEDURES

MAXIMUM LAYOUT OF THE PERSONNEL DECONTAMINATION PROCEDURES

Organization of the Personnel Decontamination Station (PDS)

A "Hot Line" section of an Exclusion Area will be established; the PDS is set up.

STATION A - A plastic ground sheet on which field equipment is dropped by returning members of the work party.
STATION B - A wash tub filled with decon Solution A.
- A second wash tub filled with rinse solution.
- A third wash tub filled with decon Solution B.
- A fourth wash tub filled with rinse solution.
- Each wash tub should be equipped with a large sponge and brush.

STATION C - A bench or stool for personnel to sit on during removal of booties.
- A ten (10) gallon pail with plastic liner where disposable boot covers are discarded.

STATION D - Two ten (10) gallon buckets filled with decon Solution A and B, respectively.
STATION E - A ten (10) gallon bucket filled with rinse solution.
STATION F - A 32 gallon trash can with plastic liner (container for rubber items).
STATION G - A bench or stool for personnel.
- A 32 gallon trash can with plastic liner (container for cloth items).

STATION H - A field shower set-up.
STATION I - A redressing and first aid station. This station defines the boundary between the Contamination Control Area and the Clean Area.

When employees have been working in a contaminated environment, the Site Safety Officer will determine the proper decontamination solution(s) for use during that period of operation. After all decontamination solutions have been formulated and all supplies are in place, personnel will be allowed to enter the "hot" area (actual site of excavation). When employees leave the "hot" zone, they will exit through the decontamination unit. All personnel will perform the following procedures with respect to the safety dress of the day.

Station A - Safely store all field equipment for reuse in the "hot" zone. If equipment is to be used outside the "hot" zone, the Site Safety Officer will perform or oversee the decontamination of this operation.

Station B - All personnel will wash all exposed surfaces with Solution A, and rinse the surface. They will then wash all exposed surfaces with Solution B and rinse the surface.

Station C - All personnel will remove disposable boot covers and outer gloves and dispose of these items in the ten (10) gallon can.

Station D & E - They will then decontaminate all exposed surfaces a second time to insure removal of the contaminants.

At this point, personnel may have air bottles changed when required and respiratory equipment checked for malfunction.

Station F - All rubber safety gear will be deposited for further cleaning and reuse or disposal.

Station G - All outer garments are removed and disposed of or reprocessed.

Station H - Personnel will remove all respiratory equipment for decontamination and maintenance by the Site Safety Officer. All personnel will then immediately enter the shower facility to insure complete decontamination.

Station I - Personnel may now perform any minor first aid procedures or don street clothes and exit to a clean area.

The use of the triple rinse scheme for decontamination will, under the most adverse conditions, decontaminate all employees and any site personnel which may become contaminated while in the "hot" zone. The level of decontamination described is for Level A hazard protection (See Hazard Assessment M&P). For lower levels of protection less stringent decontamination will be employed.

Decontamination and Rinse Solution

The decontamination solutions will be solutions of water and chemical compounds designed to react with and neutralize specific contaminants. The temperature and contact time will also be considered to insure complete neutralization. However, the contaminants will not always be known and it will be necessary to use a decontamination solution that is effective for a variety of contaminants.

Less extensive procedures for decontamination can be established when the type and degree of contamination through analysis becomes known or the potential for transfer of the contaminants is judged to be minimal. These procedures generally involve one or two washdowns and fewer precautionary measures in removing clothing.

In extreme situations when there may be a question of the efficacy of decontamination, protective clothing may have to be discarded after use or tested for the degree of decontamination.

Consideration must also be given to the protective equipment worn by those personnel operating the decontamination line. In most cases, chemical protective clothing, with boots and gloves should suffice. Unless it is suspected and/or confirmed that personnel needing decontamination are highly contaminated, air-purifying respirators with suitable canisters can be worn by the decontamination personnel (Level C Protection).

Preparation of Decontamination Solutions

Decontamination solutions will be designed to react with and neutralize the specific, potential contaminants involved with the removal operation.

However, since the contaminants at an uncontrolled waste site will be unknown in many cases, it is necessary to use a decontamination solution that is effective for a variety of contaminants. Several of these general purpose decontamination solutions are listed below:

DECON SOLUTION A - A solution containing 5% sodium carbonate (Na_2CO_3) and 5% trisodium phosphate (Na_3PO_4).

DECON SOLUTION B - A solution containing 10% trisodium phosphate ($Ca(Clo)_2$).

DECON SOLUTION C - A solution containing 5% trisodium phosphate (Na_3PO_4). This solution can also be used as a general purpose rinse.

DECON SOLUTION D - A dilute solution of hydrochloric acid (HCl).

DECON SOLUTION E - A dilute solution of phosphate free analytical quality detergent.

USES OF GENERAL PURPOSE DECON SOLUTIONS

TYPE OF HAZARD SUSPECTED	SOLUTION	DIRECTIONS TO PREPARE
1. Inorganic acids, metal processing wastes	A	To 10 gallons of water, add 4 pounds of sodium carbonate (soda lime) and 4 pounds of trisodium phosphate. Stir until evenly mixed.
2. Heavy metals: mercury, lead, cadmium, etc.	A	Same as #1 above.
3. Pesticides, fungicides, chlorinated phenols, dioxins, and PCB's	B	To 10 gallons of water, add 8 of calcium hypochlorite. Stir with wooden or plastic stirrer until evenly mixed.
4. Cyanides, ammonia, and other non-acidic inorganic wastes	B	Same as #3 above.
5. Solvents and organic compounds such as trichloroethylene, chloroform, and toulene	C (or A)	To 10 gallons of water, add 4 pounds of trisodium phosphate. Stir until evenly mixed.
6. PBB's and PCB's	C (or A)	Same as #5 above.

7. Oily, greasy unspecified wastes	C	Same as #5 above.
8. Inorganic bases, alkali, and caustic waste	D	To 10 gallons of water, add 1 pint of concentrated hydrochlori acid. Stir with a wooden or plastic stirrer.

12.0 EQUIPMENT DECONTAMINATION

12.1 Objective

Decontamination of all equipment before it leaves the work site.

12.2 Purpose

All equipment will be decontaminated to prevent the off-site migration of hazardous contaminants. At the end of the project, all equipment used at the site will be decontaminated. The purpose is to limit the environmental exposure of any contaminant.

12.3 Procedure

When a piece of equipment enters work zone or has been contaminated with material from the work zone, the following procedures will be employed at the Decontamination Station.

1. All contaminated surfaces will be rinsed with the proper decontamination solution. The choice and preparation of these solutions will be performed by the Site Safety Officer. All decontamination activity will be supervised by the Site Safety Officer. Attached is a list of the proper decontamination solutions to be used for specific materials.

2. All surfaces will then be rinsed with water and the resulting wastewater collected for disposal.

3. The outlined process above will be repeated three times to ensure thorough decontamination of the affected surfaces. Although not specifically addressed in the regulations, the EPA/WESTON team will comply with 40 CFR 262.51 pertaining to rinsing of containers.

DECONTAMINATION SOLUTIONS

DECON SOLUTION A - A solution containing 5% sodium carbonate (Na_2CO_3) and 5% trisodium phosphate (Na_3PO_4).

DECON SOLUTION B - A solution containing 10% trisodium phosphate (Na_3PO4).

DECON SOLUTION C - A solution containing 5% trisodium phosphate (Na_3PO_4). This solution can also be used as a general purpose rinse.

DECON SOLUTION D - A dilute solution of hydrochloric acid (HCl).

13.0 COMMUNICATIONS

13.1 Objective

To provide an effective communications path from the site to external sources of assistance.

13.2 Purpose

As part of the day-to-day operational needs and for emergency purposes, it is vitally important that external communications between the command post/decontamination trailer and outside (external) sources of assistance be established.

13.3 Procedure

As part of the initial mobilization process, telephone service to the command post/decontamination trailer will be provided. Therefore, external communications with local police and fire departments, first aid squads, Civil Defense agencies, etc. will be available.

Internal communications between the command post/decontamination trailer and on-site work teams will be provided in that portable two-radios will be distributed to each team and continuously monitored. Internal communications will be further aided by the institution of the "buddy system", i.e., two man work teams.

14.0 EVACUATION PROCEDURE

During the execution of the cleanup operation, there exists the possibility that extremely hazardous situations may arise. In the event of such an incidence, the EPA/WESTON project management must be able to perform immediate evacuation from the work site.

14.1 Preparation

As outlined in Section 4.0 (Site Safety Training) all participants in the project will be required to attend an EPA/WESTON sponsored safety training session prior to the initiation of field activities. EPA/WESTON believes that it can orient 100% of the expected participants to the site safety program at this time. Part of the training session will be devoted to detailed discussions on evacuation procedures from the work site.

14.2 Internal Notification

As outlined in Section 13.0 (Communications), each work team will be equipped with a portable two-way radio. Continuous monitoring of radio communications will be performed by someone in the command post/decontamination trailer on the transistion zone. Should a situation arise that negatively impacts the work site requiring the need for immediate evacuation of the site, notification will be made to the command post area by the closest work team via radio. A pre-arranged signal for evacuation will be covered during the site safety training program.

14.3 External Notification

Following immediate evacuation, an assessment of the situation will be made by the SSO from information gathered from the work team members in the area. Should external notification be required, then appropriate notification to outside state and local agencies from the telephone in the command post will be activated.

14.4 Resident Evacuation

It is highly unlikely that the residents surrounding the site will be adversely affected by problems encountered during the cleanup operation. However, EPA/WESTON will confer with the local civil defense agency and prearrange a satisfactory evacuation plan for inhabitants of the surrounding community.

In the event that external notification is required, the following Federal, State and local agencies will be contacted:

EVACUATION AND EMERGENCY PROCEDURES

Prior to any on-site work, local agencies and residents will be briefed on the remote possibility for evacuation.

In the unlikely event that an emergency requiring evacuation should occur, the following procedures will be instituted.

1. The OSC, SSO, or Contractor Supervisor will signal on-site personnel by the use of a predetermined audible alarm.

2. The on-site personnel will exit the site immediately and will not return until so signaled.

3. The SSO will inform the nearby residents of the emergency or need to evacuate.

4. Local officials (Fire, Rescue Squad, Police, Civil Defense, etc) will be notified of the emergency and instructed on the appropriate actions/responses.

Emergency Route to Hospital:

WESTON

TAT Project

SAFETY PLAN

Date: 4-24-85

Region: IV

TDD#: 04-8504-14

PCS#: 3118

A. Incident Description

1. Location: E.C. Systems Rome, GA
2. Date: 4-24-85
3. Type: Spill ( ) Fire ( ) HW Site (✓) Other
4. Status Coal tar pit uncovered by construction company
5. Response Objectives Air monitoring, contractor-monitoring activities
6. Background Review: Complete (✓) Partial ( )

   If partial, why?
7. Hazard Level: High ( ) Moderate (✓) Low ( ) Unknown( )

   Inhalation (✓) Ingestion ( ) Contact (✓) Radiation( )
8. Site Plan/Sketch attached Yes ( ) No (✓)
9. Background Material attached Yes (✓) No ( )

B. Material Description

1. Type: Liquid ( ) Solid (✓) Sludge ( ) Vapor/Gas (✓)
2. Chemical Name/Class Coal tar pitch
3. Characteristics: Corrosive ( ) Ignitable ( )

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B. **Material Description (cont'd)**

3. Characteristics(cont'd)- Biological Agent ( )

Volatile (✓) Toxic (✓) Reactive ( )

4. Toxicity: TLVs Coal Tar Pitch: 0.2 mg/m³ IDLHs 400 mg/m³ Odor TLV

Phenol: 5ppm 100 ppm .3ppm

Naphthalene: 10 ppm 500 ppm .3ppm

5. Special Hazards Carcinogen

6. Acute Exposure Symptoms Dermy Bronchitis

C. **Site Description**

1. Size <1 Acre

2. Surrounding Population High - site is in downtown Rome, Ga

3. Buildings/Homes Several buildings (downtown area)

4. Topography Flat, Construction Area

5. Receiving Waters Coosa River (200 ft.)

6. Weather Hot & Cloudy

7. Unusual Features 2 different locations of contamination
tar pit - downtown
excavated material - ~5 miles from site

8. Site History Kendrick Construction uncovered an old tank containing coal tar pitch while excavating for a construction project

D. **Personnel Protection**

1. Entry Level of Protective clothing: A ( ) B ( ) C (✓) D ( )

2. If not B, why? Previous site entries detected no hazards; area roped off

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D. **Personnel Protection (cont'd)**

3. **Site Instrument Readings:**

% 02 19.5% % LEL 0.0%

Radioactivity Background HNU _____

OVA ~1 ppm (Background) Other _____

4. If no site readings, why? _____

5. Was protective level up or downgraded: Yes ( ) No (✓)

Up or downgraded to: A ( ) B ( ) C (✓) D ( )

Why Air readings at both locations detected no air hazards. Had no contact with material. (Level C used during removal operations.)

Actual Change: _____

6. Respirator Protective Equipment:

SCBA _____ Canister Type _____

Gas Mask _____ Cartridge Type X GMCH

Ultra Twin X

Dust Mask _____

7. Protective Clothing:

Tyvek	Hard Hat	
Rubber Boots	Face Shield	
" Gloves		

8. Field Monitoring Equipment and Materials:

OVA		

WESTON

E. Decontamination Procedures

1. Attach sketch showing Exclusion Zone, Contamination Reduction Zone, Support Zone and numerically labelled Decontamination Stations.

2. For each decontamination station note procedure and materials need on an attachment page.

F. General Information

1. Team members

Sue Fields — (OSC) EPA

Lisa M Burton — TAT

2. Site Safety Coordinator LISA BURTON

G. Emergency Information

1. Have nearby people been evacuated: Yes ( ) No (✓)

If yes over how large and area?

Who initiated the evacuation?

2. First Aid Instructions See Attachment

3. Sources of help:

	NAME	TOWN	PHONE	NOTIFIED Yes	NOTIFIED No
Fire	Rome F.D.	Rome, Ga	404 291-4222	( )	(✓)
Police	Rome P.D.	"	404 291-0911	( )	(✓)
Ambulance	REDMAN PARK HOSP	"	911	( )	(✓)

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3. Sources of help (cont'd)

	NAME	TOWN	PHONE	NOTIFIED Yes	NOTIFIED No
Hospital	REDMAN PARK HOSP	ROME	291-0291	( )	(✓)
Poison Info	National Service			( )	( )
Airport				( )	( )
Heliport				( )	( )
Site Tel	None			( )	( )
Nearest Tel				( )	( )

4. Emergency Telephone Numbers

WESTON Hot Line	215-524-1925 or 1926	
WESTON NPO	215-431-0797 or 0798 or 215-692-3030	
P. B. Lederman - NPM	201-665-0359	(Home)
S. M. Gertz - HSO	215-667-5461	(Home)
Medical Emergency	513-421-3063	(Nat'l Service)
EPA - ERT Emergency	201-321-6660	
Chemtrec	800-424-9300	
Centers For Disease Control	404-329-3311 404-329-3644	(day) (night)
National Pesticide Medical Emergency	800-845-7633	(Regional Services)

WESTON

Prepared by Kevin Griffis / Lisa Burton

Date 4/24/85

Approved by Neal Strickland

Date 4/24/85

FOR HSO USE ONLY

Reviewed and Comments _____

Action Required? Yes ( ) No ( ) If yes, what action_____

Followup carried out? Date_____

S.O. Signature Date

Name and Formula		Exposure Limit	IDLH Level	Physical Description	Chemical and Physical Properties		Incompatibles	Measurement Method and Set (See Table 1)
Chromium metal & insoluble salts	Synonyms vary depending upon specific compound	1 mg/m³ SEE APPENDIX A	500 mg/m³	Appearance and odor vary depending upon specific compound	Properties vary depending upon specific compound		Strong oxidizers	Filter, acid, AA, O
Chromium as soluble chromic & chromous salts	Synonyms vary depending upon specific compound	0.5 mg/m³ SEE APPENDIX A	250 mg/m³	Appearance and odor vary depending upon specific compound	Properties vary depending upon specific compound		Water	Filter, acid, AA, O
Coal tar pitch volatiles	Synonyms vary depending upon specific compound	0.2 mg/m³ (NIOSH) 0.1 mg/m³ 10 hr/TWA	400 mg/m³ Ca	Appearance and odor vary depending upon specific compound	Properties vary depending upon specific compound		Strong oxidizers	—
Cobalt metal fume and dust Co/CoO/Co_3O_4/Co_2O_3	None	0.1 mg/m³	20 mg/m³	Odorless, black solid or finely divided particulates dispersed in air	MW 59 to 182 BP 5612 F Sol Insoluble F/P N.A.	VP 0 mm MP 2715 F UEL N.A. LEL N.A.	Strong oxidizers	NIOSH 77-157A
Copper dusts and mists $CuSO_4 \cdot 5H_2O$/CuCl	Copper sulfate dust or mist, Cuprous chloride dust	1 mg/m³	N.A.	Odorless solids	MW $CuCO_3$ 250 CuCl 99 BP N.A. Sol $CuSO_4$ 0.006% CuCl 35% F/P ?	VP N.A. MP $CuSO_4$ 302 F CuCl 806 F UEL ? LEL ?	Acetylene gas, magnesium metal	Filter, acid, AA, M

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Personal Protection and Sanitation (See Table 2)		Respirator Selection: Upper Limit	Respirator Selection: Devices Permitted (See Table 3)	Health Hazards: Route	Symptoms (See Table 4)	First Aid (See Table 5)		Target Organs
Clothing Goggles Wash Change Remove	Repeat prolong Reason prob Promptly upon contam N.A. Promptly contam non-imperv	5 mg/m³ 10 mg/m³ 50 mg/m³ 500 mg/m³	DM DMXSQ/FuHIEP/SA/SCBA HIEPF/SAF/SCBAF PAPHIE/SA:PD,PP,CF	Inh Ing	Histologic fibrosis of lungs	Eye Skin Breath Swallow	In immed Soap wash Art resp Water, vomit	Resp sys, lungs
Clothing Goggles Wash Change Remove	Repeat prolong Any poss Promptly upon contam N.A. Promptly contam non-imperv	2.5 mg/m³ 5 mg/m³ 25 mg/m³ 250 mg/m³	DMXS DMXSQ/FuHIEP/SA/SCBA HIEPF/SAF/SCBAF PAPHIEP/SA:PD,PP,CF	Ing Con	Sens derm	Eye Skin Breath Swallow	In immed Water flush promptly Art resp Water, vomit	Skin
Clothing Goggles Wash Change Remove	Reason prob Reason prob Daily reason prob After work if may be contam N.A.	2 mg/m³ 10 mg/m³ 200 mg/m³ 400 mg/m³ Escape	CCROVFuHIE/SA/SCBA CCROVFFuHIE/GMOVFFuHIE/SAF/SCBAF SA:PD,PP,CF/PAPCCROVHIEP SAF:PD,PP,CF GMOVPaII/SCBA	Inh Con	Cancer lungs, skin, kidneys, derm, bronchitis	Eye Skin Breath	In immed Soap wash Art resp	Resp sys, lungs, bladder, kidneys, skin
Clothing Goggles Wash Change Remove	Repeat prolong N.A. Promptly upon contam After work if may be contam Promptly contam non-imperv	0.5 mg/m³ 1.0 mg/m³ 5 mg/m³ 20 mg/m³ Escape	DMXS DMXSQ/FuHIEP HIEPF/SAF/SCBAF PAPHIEP/SAF:PD,PP,CF HIEPF/SCBA	Inh Ing Con	Cough, dyspnea, decrease pulm funct, lowt, derm, diffuse nodular fibrosis, resp hypersensitivity	Eye Skin Breath Swallow	In immed Soap wash Art resp Water, vomit	Resp sys, skin, lungs
Clothing Goggles Wash Change Remove	Repeat prolong Reason prob Promptly upon contam After work if may be contam Promptly contam non-imperv	50 mg/m³ 2000 mg/m³	HIEPF/SAF/SCBAF SAF:PD,PP,CF	Inh Ing Con	Irrit muc mem, pharynx, nas ulc perforation, eye irrit, metal taste, derm	Eye Skin Breath Swallow	In immed Soap wash promptly Art resp Water, vomit	Resp sys, lungs, skin, liver, inc risk with Wilson's disease, kidneys

Copper dusts and mists

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WESTON

TAT Project

SAFETY PLAN

Date: 4-24-85

Region: IV

TDD#: 04-8504-14

PCS#: 3118

A. Incident Description

1. Location: E.C. Systems Rome, GA
2. Date: 4-24-85
3. Type: Spill ( ) Fire ( ) HW Site (✓) Other
4. Status Coal tar pit uncovered by construction company
5. Response Objectives Air monitoring, contractor-monitoring activities
6. Background Review: Complete (✓) Partial ( )

   If partial, why?
7. Hazard Level: High ( ) Moderate (✓) Low ( ) Unknown( )

   Inhalation (✓) Ingestion ( ) Contact (✓) Radiation( )
8. Site Plan/Sketch attached Yes ( ) No (✓)
9. Background Material attached Yes (✓) No ( )

B. Material Description

1. Type: Liquid ( ) Solid (✓) Sludge ( ) Vapor/Gas (✓)
2. Chemical Name/Class Coal tar pitch
3. Characteristics: Corrosive ( ) Ignitable ( )

RFW 385-2-83

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B. **Material Description (cont'd)**

3. Characteristics (cont'd) - Biological Agent ( )

Volatile (✓) Toxic (✓) Reactive ( )

4. Toxicity: TLVs Coal Tar Pitch: 0.2 mg/m³ IDLHs 100 mg/m³ Odor TLV

Phenol: 5 ppm 100 ppm .3 ppm

Naphthalene: 10 ppm 500 ppm .3 ppm

5. Special Hazards Carcinogen

6. Acute Exposure Symptoms Dermy Bronchitis

C. **Site Description**

1. Size <1 Acre

2. Surrounding Population High - site is in downtown Rome, Ga

3. Buildings/Homes Several buildings (downtown area)

4. Topography Flat, Construction area

5. Receiving Waters Coosa River (200 ft.)

6. Weather Hot & Cloudy

7. Unusual Features 2 different locations of contamination
tar pit - downtown
excavated material - ~5 miles from site

8. Site History Kendrick Construction uncovered an old tank containing coal tar pitch while excavating for a construction project

D. **Personnel Protection**

1. Entry Level of Protective clothing: A ( ) B ( ) C (✓) D ( )

2. If not B, why? Previous site entries detected no hazards; area roped off

WESTON

D. **Personnel Protection (cont'd)**

3. **Site Instrument Readings:**

% O2 19.5% % LEL 0.0%

Radioactivity Background HNU _____

OVA ~1 ppm (Background) Other _____

4. If no site readings, why? _____

5. Was protective level up or downgraded: Yes ( ) No (✓)

Up or downgraded to: A ( ) B ( ) C (✓) D ( )

Why Air readings at both locations detected no air hazards. Had no contact with material. (Level C used during removal operations.)

Actual Change: _____

6. Respirator Protective Equipment:

SCBA _____ Canister Type _____

Gas Mask _____ Cartridge Type X GMCH

Ultra Twin X

Dust Mask _____

7. Protective Clothing:

Tyvek Hard Hat

Rubber Boots Face Shield

Gloves

8. Field Monitoring Equipment and Materials:

OVA

WESTON

E. Decontamination Procedures

1. Attach sketch showing Exclusion Zone, Contamination Reduction Zone, Support Zone and numerically labelled Decontamination Stations.

2. For each decontamination station note procedure and materials need on an attachment page.

F. General Information

1. Team members

Sue Fields	(OSC) EPA
Lisa M Burton	TAT

2. Site Safety Coordinator LISA BURTON

G. Emergency Information

1. Have nearby people been evacuated: Yes ( ) No (✓)

If yes over how large and area?_____

Who initiated the evacuation?_____

2. First Aid Instructions See Attachment

3. Sources of help:

	NAME	TOWN	PHONE	NOTIFIED Yes	NOTIFIED No
Fire	Rome F.D.	Rome, Ga	404 291-4222	( )	(✓)
Police	Rome P.D.	"	404 291-0911	( )	(✓)
Ambulance	REDMAN PARK HOSP	"	911	( )	(✓)

WESTON

3. Sources of help (cont'd)

	NAME	TOWN	PHONE	NOTIFIED Yes	NOTIFIED No
Hospital	REDMAN PARK HOSP	ROME	271-0271	( )	(✓)
Poison Info	National Service			( )	( )
Airport				( )	( )
Heliport				( )	( )
Site Tel	None			( )	( )
Nearest Tel				( )	( )

4. Emergency Telephone Numbers

WESTON Hot Line	215-524-1925 or 1926	
WESTON NPO	215-431-0797 or 0798 or 215-692-3030	
P. B. Lederman - NPM	201-665-0359	(Home)
S. M. Gertz - HSO	215-667-5461	(Home)
Medical Emergency	513-421-3063	(Nat'l Service)
EPA - ERT Emergency	201-321-6660	
Chemtrec	800-424-9300	
Centers For Disease Control	404-329-3311 404-329-3644	(day) (night)
National Pesticide	800-845-7633	
Medical Emergency		(Regional Services)

WESTON

Prepared by Trevor Griffiths / Lisa Burton

Date 4/24/85

Approved by Neil Strickland

Date 4/24/85

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Reviewed and Comments _____

Action Required? Yes ( ) No ( ) If yes, what action _____

Followup carried out? Date _____

S.O. Signature Date

Formula		Exposure Limit	IDLH Level	Physical Description	Chemical and Physical Properties		Incompatibles	Measurement Method and Set (See Table 1)
Chromium metal & insoluble salts	Synonyms vary depending upon specific compound	1 mg/m³ SEE APPENDIX A	500 mg/m³	Appearance and odor vary depending upon specific compound	Properties vary depending upon specific compound		Strong oxidizers	Filter, acid, AA, O
Chromium as soluble chromic & chromous salts	Synonyms vary depending upon specific compound	0.5 mg/m³ SEE APPENDIX A	250 mg/m³	Appearance and odor vary depending upon specific compound	Properties vary depending upon specific compound		Water	Filter, acid, AA, O
Coal tar pitch volatiles	Synonyms vary depending upon specific compound	0.2 mg/m³ (NIOSH) 0.1 mg/m³ 10 hr/TWA	400 mg/m³ Ca	Appearance and odor vary depending upon specific compound	Properties vary depending upon specific compound		Strong oxidizers	—
Cobalt metal fume and dust Co/CoO/Co_3O_4/Co_2O_3	None	0.1 mg/m³	20 mg/m³	Odorless, black solid or finely divided particulates dispersed in air	MW 59 to 182 BP 5612 F Sol Insoluble FLP N.A.	VP 0 mm MP 2715 F UEL N.A. LEL N.A.	Strong oxidizers	NIOSH 77-157A
Copper dusts and mists $CuSO_4 \cdot 5H_2O$/CuCl	Copper sulfate dust or mist, Cuprous chloride dust	1 mg/m³	N.A.	Odorless solids	MW $CuCO_3$ 250 CuCl 99 BP N.A. Sol $CuSO_4$ 0.006% CuCl 35% FLP ?	VP N.A. MP $CuSO_4$ 302 F CuCl 806 F UEL ? LEL ?	Acetylene gas, magnesium metal	Filter, acid, AA, M

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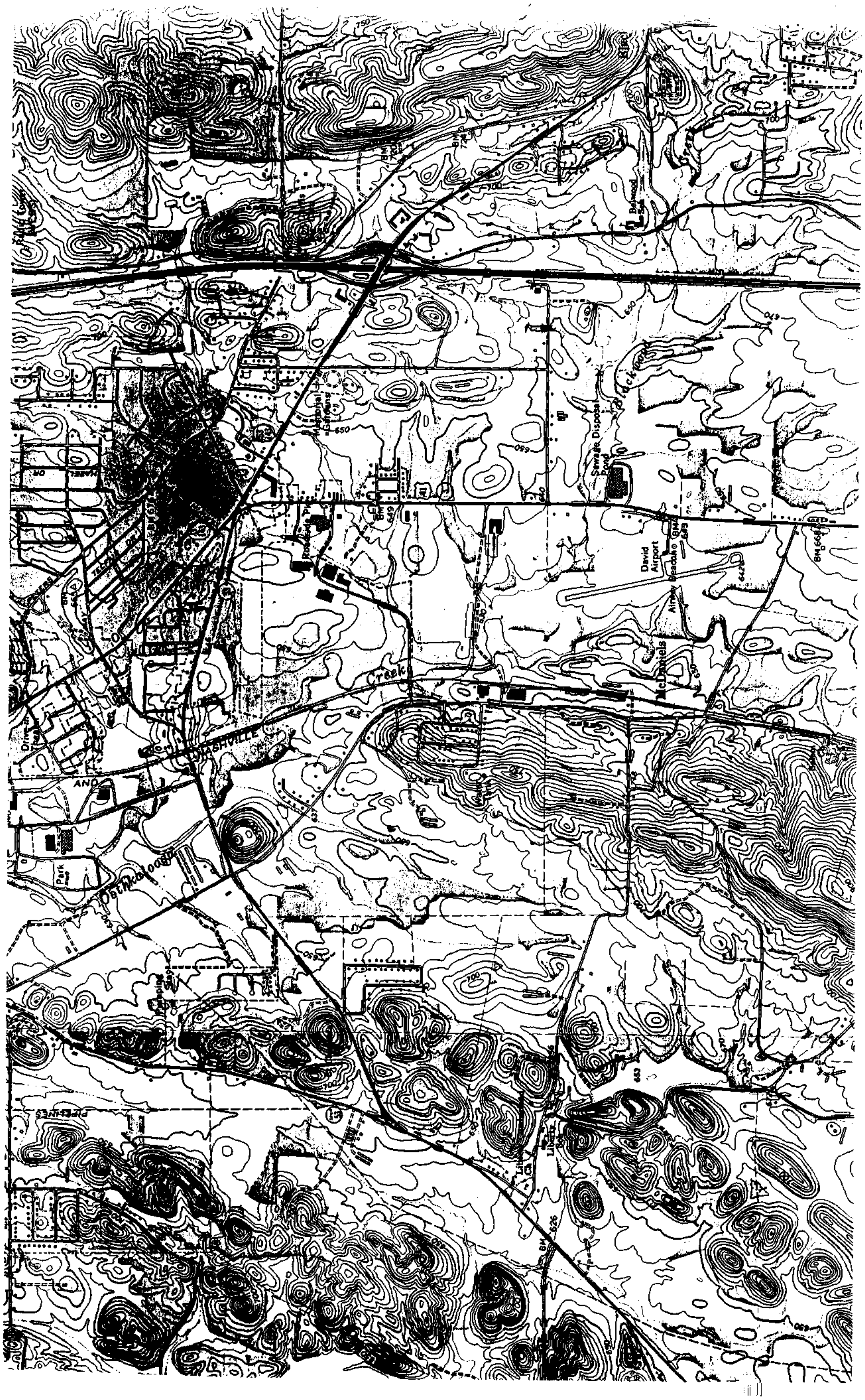
Personal Protection and Sanitation (See Table 2)	Respirator Selection: Upper Limit	Respirator Selection: Devices Permitted (See Table 3)	Health Hazards: Route	Health Hazards: Symptoms (See Table 4)	Health Hazards: First Aid (See Table 5)		Health Hazards: Target Organs
Clothing Repeat prolong Goggles Reason prob Wash Promptly upon contam Change N.A. Remove Promptly contam non-imperv	5 mg/m³: 10 mg/m³: 50 mg/m³: 500 mg/m³:	DM DMXSQ/FuHIEP/SA/SCBA HIEPF/SAF/SCBAF PAPHIE/SA:PD,PP,CF	Inh Ing	Histologic fibrosis of lungs	Eye Skin Breath Swallow	In immed Soap wash Art resp Water, vomit	Resp sys, lungs
Clothing Repeat prolong Goggles Any poss Wash Promptly upon contam Change N.A. Remove Promptly contam non-imperv	2.5 mg/m³: 5 mg/m³: 25 mg/m³: 250 mg/m³:	DMXS DMXSQ/FuHEP/SA/SCBA HIEPF/SAF/SCBAF PAPHIEP/SA:PD,PP,CF	Ing Con	Sens derm	Eye Skin Breath Swallow	In immed Water flush promptly Art resp Water, vomit	Skin
Clothing Reason. prob Goggles Reason prob Wash Daily reason prob Change After work if may be contam Remove N.A.	2 mg/m³: 10 mg/m³: 200 mg/m³: 400 mg/m³: Escape:	CCROVFuHIE/SA/SCBA CCROVFFuHIE/GMOVFFuHIE/SAF/SCBAF SA:PD,PP,CF/PAPCCROVHIEP SAF:PD,PP,CF GMOVPest/SCBA	Inh Con	Cancer lungs, skin, kidneys, derm, bronchitis	Eye Skin Breath	In immed Soap wash Art resp	Resp sys, lungs, bladder, kidneys, skin
Clothing Repeat prolong Goggles N.A. Wash Promptly upon contam Change After work if may be contam Remove Promptly contam non-imperv	0.5 mg/m³: 1.0 mg/m³: 5 mg/m³: 20 mg/m³: Escape:	DMXS DMXSQ/FuHEP HIEPF/SAF/SCBAF PAPHIEP/SAF:PD,PP,CF HIEPF/SCBA	Inh Ing Con	Cough, dysp, decrease pulm func, lowt, derm, diffuse nodular fibrosis, resp hypersensitivity	Eye Skin Breath Swallow	In immed Soap wash Art resp Water, vomit	Resp sys, skin, lungs
Clothing Repeat prolong Goggles Reason prob Wash Promptly upon contam Change After work if may be contam Remove Promptly contam non-imperv	50 mg/m³: 2000 mg/m³:	HIEPF/SAF/SCBAF SAF:PD,PP,CF	Inh Ing Con	Irrit muc membr, pharyngitis, nasal septal perforation, eye irrit, metal taste, derm	Eye Skin Breath Swallow	In immed Soap wash promptly Art resp Water, vomit	Resp sys, lungs skin, liver, inc risk with Wilson's disease, kidneys

Copper dusts and mists

71


Sewage Disposal Pond
David Airport
McDaniels
Creek
Park

Ron Coal Tar Pit

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

Commissioner

J. LEONARD LEDBETTER
Division Director

April 24, 1985

Mr. Joel Veater
RCRA 3012 Project Officer
US EPA Region IV
345 Courtland Street
Atlanta, GA 30365

Dear Mr. Veater:

Enclosed are names, addresses or locations and discovery dates of sites that have been identified through our Uncontrolled Hazardous Waste Site Discovery Program. Please note that Davidson Mineral Properties was submitted earlier with the incorrect name of Davis Mineral Properties (GAD981004013). Please make this correction on the CERCLA list and add the other sites.

If you have any questions, please call me at 656-7404.

Sincerely,

Joseph T. Surowiec
Unit Coordinator
Remedial Action Unit

JTS/mcw019
cc: John D. Taylor, Jr.
File - ERRIS/CERCLA Site Discovery File

DATE April 24, 1985

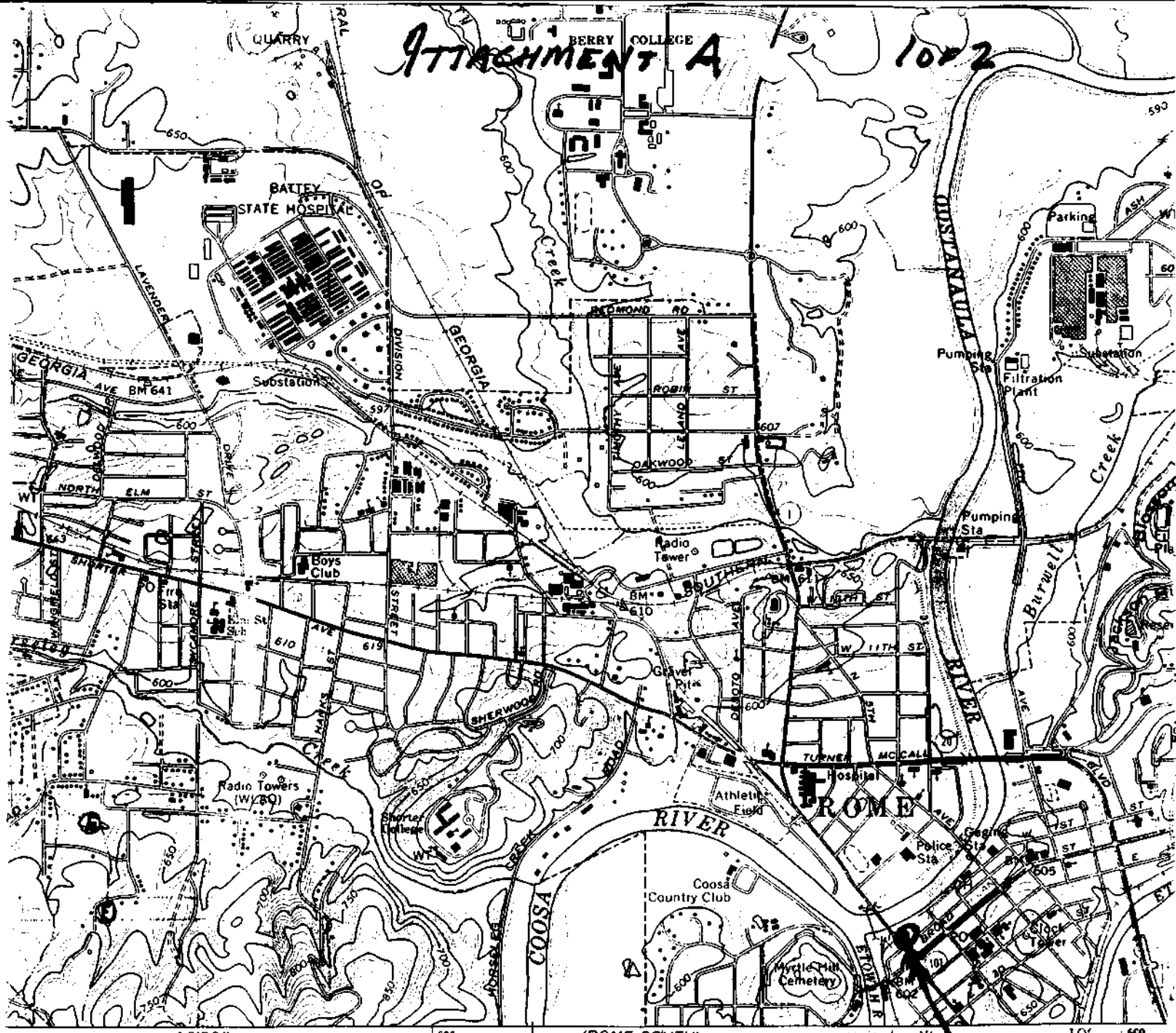
-ENCLOSURE-

UNCONTROLLED HAZARDOUS WASTE SITE(S)

(ERRIS ADDITIONS)

SITE NAME	SITE ADDRESS OR LOCATION (COUNTY)	DISCOVERY DATE
Rome Coal Tar Pit	Behind building on north corner of intersection of Broad Street and 2nd Ave., Rome, GA 30161. Floyd County Latitude: 34° 15' 12.5" Longitude: 85° 10' 23.5" This site consists of a coal tar pit that is combustible and may contain toxic materials. (Attachment A)	April 15, 1985
Davidson Mineral Properties Drum Dump (GAD981004013) This site was incorrectly submitted as Davis Mineral Properties Drum Dump.	7057 Maddox Road Lithonia, GA 30058 Dekalb County 26 fifty-five gallon drums dumped by unknown persons (Attachment B)	March 26, 1985
Metro Waste Landfill	2141 Gamble Road Savannah, GA 31405 Chatham County This site is a Georgia EPD permitted landfill that was closed in the late 1970's. It has received waste oil and possibly hazardous wastes. (Attachment C)	February 20, 1985
Quality Plaza Drum Dump	1247 Simpson Road Atlanta, GA 30314 43 fifty-five gallon drums dumped by unknown persons. Some drums leaked contents onto ground. Drums removed by EPA contractor. Contamination may remain. (Attachment D)	February 22, 1985

ATTACHMENT A 1 of 2



SCALE 1:24 000

1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

MN GN

1° 18 MILS 1°01' 18MILS

ND 1967 MAGNETIC NORTH
ON AT CENTER OF SHEET

CONTOUR INTERVAL 10 FEET
DATUM IS MEAN SEA LEVEL

ROME COALTAR PIT

34°15'12.5" Lat
85°10'23.5" Long

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

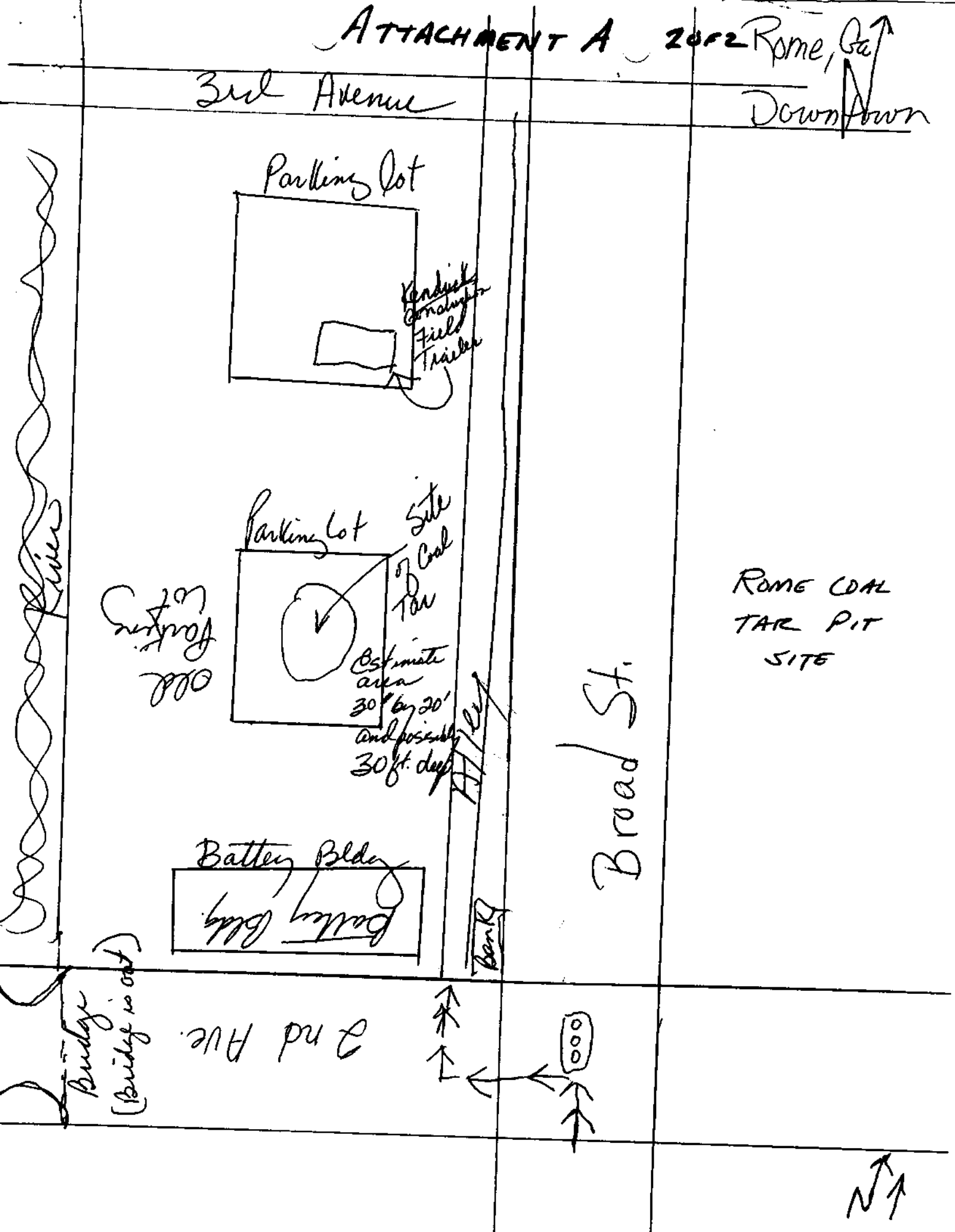
N

ROME NORTH, GA.
N3415 —W8507.5/7.5

1967

AMS 3952 I SW—SERIES V845

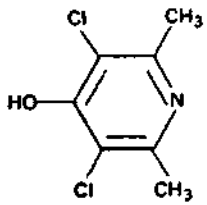
ATTACHMENT A 2 of 2



(3) National Institute for Occupational Safety and Health, *Information Profiles on Potential Occupational Hazards: Inorganic Chromium Compounds*, Report PB-276,678, pp 136-142, Rockville, MD (October 1977).
(4) U.S. Environmental Protection Agency, *Chromium: Ambient Water Quality Criteria*, Washington, DC (1980).
(5) U.S. Environmental Protection Agency, *Toxicology of Metals, Vol. II: Chromium*, Report EPA-600/1-77-022, pp 164-187, Research Triangle Park, NC (May 1977).
(6) National Academy of Sciences, *Medical and Biological Effects of Environmental Pollutants: Chromium*, Washington, DC (1974).
(7) U.S. Environmental Protection Agency, *Reviews of the Environmental Effects of Pollutants: III, Chromium*, Report EPA-600/1-78-023, Cincinnati, OH (1978).
(8) U.S. Environmental Protection Agency, *Chromium*, Health and Environmental Effects Profile No. 51, Office of Solid Waste, Washington, DC (April 30, 1980).

CLOPIDOL

Description: 3,5-Dichloro-2,6-dimethyl-4-pyridinol with the structural formula:



Clopidol is a crystalline solid melting above 320°C.

Code Numbers: CAS 2971-90-6

DOT Designation: —

Synonyms: Meticlorpindol, clopindol, Coyden®.

Potential Exposures: Those engaged in formulation, application or manufacture [see U.S. Patent 3,206,358 (1965)] of this veterinary coccidiostat.

Permissible Exposure Limits in Air: There is no Federal standard, however ACGIH has adopted a TWA value of 10 mg/m^3 and set a tentative STEL of 20 mg/m^3.

Permissible Concentration in Water: No criteria set.

Harmful Effects and Symptoms: Clopidol has a low order of toxicity. Rats fed 15 mg/kg/day for 2 years showed no ill effects (A-34).

COAL TAR PITCH VOLATILES

- Carcinogen (Human, ACGIH) (A-6)

Description: The term "coal tar products," as used by NIOSH (1), includes coal tar and two of the fractionation products of coal tar, creosote and coal tar pitch, derived from the carbonization of bituminous coal. Coal tar, coal tar pitch, and creosote derived from bituminous coal often contain identifiable components which by themselves are carcinogenic, such as benzo[a]pyrene, benzanthracene, chrysene, and phenanthrene. Other chemicals from coal tar products such as anthracene, carbazole, fluoranthene, and pyrene may also cause cancer, but these causal relationships have not been adequately documented.

Code Numbers:

Coal tar	CAS 8007-45-2	RTECS GF8600000	UN 1999
Coal tar pitch	CAS - None	RTECS GF8655000	
Coal tar distillate	CAS - None	RTECS GF8617500	UN 1136

DOT Designation: Coal tar distillate: Combustible liquid.

Synonyms: None.

Potential Exposures: The coke-oven plant is the principal source of coal tar. The hot gases and vapors produced during the conversion of coal to coke are collected by means of a scrubber, which condenses the effluent into ammonia, water, crude tar, and other by-products. Crude tar is separated from the remainder of the condensate for refining and may undergo further processing.

Employees may be exposed to pitch and creosote in metal and foundry operations, when installing electrical equipment, and in construction, railway, utility, and briquette manufacturing. A list of primary employment in which the various types of pitch and creosote are encountered is as follows:

Product	User Industry	Percent of Tar Processed	Number of Jobs Affected
Electrode binder pitch	aluminum	43.2	28,000
	steel	3.0	50,000
	graphite	9.2	10,000
Core pitch	foundry	2.2	2,000
Refractory pitch	steel	2.4	50,000
Fiber pitch	electrical	3.5	—
Miscellaneous pitch	various	3.4	—
Roofing pitch	construction	8.8	—
Other tars and fuel residue	fuel	24.3	—
Creosote	railway, utility, construction	—	5,000

Incompatibilities: Strong oxidizers.

Permissible Exposure Limits in Air: In 1967, the American Conference of Governmental Industrial Hygienists (ACGIH) adopted a threshold limit value (TLV) of 0.2 mg/m^3 for coal tar pitch volatiles (CTPV), described as a "benzene-soluble" fraction, and listed certain carcinogenic components of CTPV. The TLV was established to minimize exposure to the listed substances believed to be carcinogens, viz, anthracene, benzo[a]pyrene, phenanthrene, acridine, crysene, and pyrene. This TLV was promulgated as a Federal standard under the Occupational Safety and Health Act of 1970 (29 CFR 1910.1000). No foreign standards were found for exposure to coal tar pitch or creosote.

In 1973, NIOSH published the *Criteria for a Recommended Standard—Occupational Exposure to Coke Oven Emissions*, recommending work practices to minimize the harmful effects of exposure to coke-oven emissions and inhalation of coal tar pitch volatiles. In 1974, OSHA established a Standards Advisory Committee on Coke-Oven Emissions to study the problem of the exposure of coke-oven workers to CTPV and to prepare recommendations for an effective standard in the assigned area. In 1975, the Committee recommended a limit of 0.2 μg/m^3 for benzo[a]pyrene (*Federal Register*, 41:46742-46787, October 22, 1976).

According to a NIOSH publication (1), occupational exposure to coal tar products shall be controlled so that employees are not exposed to coal tar, coal tar pitch, creosote or mixtures of these substances at a concentration greater than 0.1 mg/m^3 of the cyclohexane-extractable fraction of the sample, determined as a time-weighted average (TWA) concentration for up to a 10-hour workshift in a 40-hour workweek.

Determination in Air: Collection on a filter, extraction, column chromatography, spectrophotometric measurement (A-10). Benzene solubles may be determined by collection of particulates on a filter, ultrasonic extraction with benzene, evaporation and gravimetric determination (A-10).

Permissible Concentrations in Water: See "Polynuclear Aromatic Hydrocarbons."

Determination in Water: See "Polynuclear Aromatic Hydrocarbons."

Routes of Entry: Inhalation and skin and eye contact.

Harmful Effects and Symptoms: Based on a review of the toxicologic and epidemiologic evidence presented, it has been concluded (1) that some materials contained in coal tar pitch, and, therefore, in coal tar, can cause lung and skin cancer, and perhaps cancer at other sites. Based on a review of experimental toxicologic evidence, it is also concluded that creosote can cause skin and lung cancer. While the evidence on creosote is not so strong as that on pitch (in part because of difficulties in chemical characterization of such mixtures), the conclusion on the carcinogenic potential of creosote is supported by information on the presence of polynuclear aromatic hydrocarbons and imputations and evidence of the carcinogenicity of such hydrocarbons.

Points of Attack: Respiratory system, lungs, bladder, kidneys, skin.

Medical Surveillance: Medical surveillance shall be made available, as specified below, to all employees occupationally exposed to coal tar products. See also reference (2).

Preplacement Medical Examinations – These examinations shall include:

- Comprehensive initial medical and work histories, with special emphasis directed toward identifying preexisting disorders of the skin, respiratory tract, liver, and kidneys.
- A physical examination giving particular attention to the oral cavity, skin, and respiratory system. This shall include posteroanterior and lateral chest x-rays (35 x 42 cm). Pulmonary function tests, including forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV 1.0), and a sputum cytology examination shall be offered as part of the medical examination of exposed employees. Other tests, such as liver function and urinalysis, should be performed as considered appropriate by the responsible physician. In addition, the mucous membranes of the oral cavity should be examined.
- A judgement of the employee's ability to use positive pressure respirators.

Periodic Examinations – These examinations shall be made available at least annually and shall include:

- Interim medical and work histories.
- A physical examination as outlined above.

Initial Medical Examinations – These examinations shall be made available to all workers as soon as practicable after the promulgation of a standard based on these recommendations.

Pertinent Medical Records – These records shall be maintained for at least 30 years after termination of employment. They shall be made available to medical representatives of the government, the employer or the employee.

First Aid: If this chemical gets into the eyes, irrigate immediately. If this chemical contacts the skin, wash with soap. If a person breathes in large amounts of this chemical, move the exposed person to fresh air at once and perform artificial respiration.

Personal Protective Methods: Employers shall use engineering controls when needed to keep the concentration of airborne coal tar products at, or below, the specified limit. Employers shall provide protective clothing and equipment impervious to coal tar products to employees whenever liquid coal tar products may contact the skin or eyes. Emergency equipment shall be located at well-marked and clearly identified stations and shall be adequate to permit all personnel to escape from the area or to cope safely with the emergency on reentry. Protective equipment shall include: eye and face protection; protective clothing; and respiratory protection as spelled out in detail by NIOSH (1).

Respirator Selection:

2 mg/m^3:	CCROVFuHiE/SA/SCBA
10 mg/m^3:	CCROVFFuHiE/GMOVFFuHiE/SAF/SCBAF
200 mg/m^3:	SA:PD,PP,CF/PAPCCROVHiEP
400 mg/m^3:	SAF:PD,PP,CF
Escape:	GMOVPest/SCBA

Disposal Method Suggested: Incineration.

References

(1) National Institute for Occupational Safety and Health, *Criteria for a Recommended Standard: Occupational Exposure to Coal Tar Products*, NIOSH Document No. 78-107, Washington, DC (September 1977).

(2) National Institute for Occupational Safety and Health, *A Guide to the Work Relatedness of Disease*, Revised Edition, pp 80-87, DHEW (NIOSH) Publication No. 79-116, Cincinnati, OH (January 1979).

COBALT AND COMPOUNDS

- Hazardous substances (EPA) (some compounds)
  Cobalt compounds designated as hazardous substances by EPA include: cobaltous bromide, cobaltous formate and cobaltous sulfamate.

Description: Co, cobalt, is a silver-grey, hard, brittle, magnetic metal. It is relatively rare; the important mineral sources are the arsenides, sulfides, and oxidized forms. It is generally obtained as a by-product of other metals, particularly copper. Cobalt is insoluble in water, but soluble in acids. Cobalt fume and dust have the composition $Co/CoO/Co_2O_2/Co_2O_4$.

Code Numbers:

Cobalt metal	CAS 7440-48-4	RTECS GF8750000
Cobaltous oxide	CAS 1307-96-6	RTECS GG2800000
Cobaltic oxide	CAS 1308-04-9	RTECS GG2900000

DOT Designation: –

Synonyms: None.

Respirator Selection:

42% Cl compound, 10 mg/m^3: SAF/SCBAF
Escape: GMPest/SCBA
54% Cl compound, 5 mg/m^3: SAF/SCBAF
Escape: GMPest/SCBA

Disposal Method Suggested: Incineration (3000°F) with scrubbing to remove any chlorine-containing products (A-31). In addition, some chemical waste landfills have been approved for PCB disposal. More recently treatment with metallic sodium has been advocated which yields a low molecular weight polyphenylene and sodium chloride.

References

(1) National Institute for Occupational Safety and Health, *Criteria for a Recommended Standard: Occupational Exposure to Polychlorinated Biphenyls*, NIOSH Doc. No. 77-225 (1977).
(2) U.S. Environmental Protection Agency, *Polychlorinated Biphenyls: Ambient Water Quality Criteria*, Washington, DC (1980).
(3) National Academy of Sciences, *Polychlorinated Biphenyls*, Washington, DC (1979).
(4) International Agency for Research on Cancer, *IARC Monographs on the Carcinogenic Risks of Chemicals to Humans*, Lyon, France, 7, 261 (1974) and 18, 43 (1978).
(5) World Health Organization, *Polychlorinated Biphenyls and Triphenyls*, Environmental Health Criteria No. 2, Geneva, Switzerland (1976).

POLYNUCLEAR AROMATIC HYDROCARBONS

- Carcinogen (Benzo[a]pyrene) (Animal positive, IARC) (8)
- Hazardous wastes (EPA)
- Priority toxic pollutants (EPA)

Description: The polynuclear aromatic hydrocarbons constitute a class of materials of which benzo[a]pyrene is one of the most common and also the most hazardous.

Benzo[a]pyrene, $C_{20}H_{12}$, is a yellowish crystalline solid, melting at 179°C. It consists of five benzene rings joined together. Other polynuclear aromatics which are discussed in separate sections in this volume are as follows: acenaphthene, fluoranthene and naphthalene. A variety of abbreviations are in common use for the polynuclear aromatics as shown below:

Abbreviation	Compound Designated
A	Anthracene
BaA	Benzo[a]anthracene (1,2-benzanthracene)
BaP (also BP)	Benzo[a]pyrene (3,4-benzopyrene)
BbFL (also BbF)	Benzo[b]fluoranthene
BeP	Benzo[e]pyrene
BjFL (also BjF)	Benzo[j]fluoranthene
BkFL (also BkF)	Benzo[k]fluoranthene (11,12-benzofluoranthene)
BPR	Benzo[ghi]perylene (1,12-benzoperylene)
CH (also CR)	Chrysene
DBA	Dibenzo[ah]anthracene (1,2,5,6-benzanthracene)
F	Fluorene
FL (also F)	Fluoranthene
IP	Indeno[1,2,3-cd]pyrene

(continued)

Abbreviation	Compound Designated
P	Pyrene
PA (also Phen)	Phenanthrene
PR (also Per)	Perylene

Note: These abbreviations are not endorsed by any body such as the International Union of Chemistry; rather they are a form of shorthand used by authors for convenience, and they vary with the author.

Code Numbers: (For benzo[a]pyrene) CAS 50-32-8 RTECS DJ3675000

DOT Designation: —

Synonyms: PNAs, PAHs, PPAHs (Particulate Polycyclic Aromatic Hydrocarbons) and POMs (Polynuclear Organic Materials). (Benzo[a]pyrene is also known as BAP.)

Potential Exposures: PNAs can be formed in any hydrocarbon combustion process and may be released from oil spills. The less efficient the combustion process, the higher the PNA emission factor is likely to be. The major sources are stationary sources, such as heat and power generation, refuse burning, industrial activity, such as coke ovens, and coal refuse heaps. While PNAs can be formed naturally (lightning-ignited forest fires), impact of these sources appears to be minimal. It should be noted, however, that while transportation sources account for only about 1% of emitted PNAs on a national inventory basis, transportation-generated PNAs may approach 50% of the urban resident exposures.

Because of the large number of sources, most people are exposed to very low levels of PNAs. BAP has been detected in a variety of foods throughout the world. A possible source is mineral oils and petroleum waxes used in food containers and as release agents for food containers. FDA studies have indicated no health hazard from these sources.

The air pollution aspects of the carcinogenic polynuclear aromatic hydrocarbons (PAH) and of benzo[a]pyrene (BAP) in particular have been reviewed in some detail by Olsen and Haynes (1). The total emissions of benzo[a]pyrene (BAP) and some emission factors for BAP are as presented by Goldberg (2).

Permissible Exposure Limits in Air: A TLV of 0.2 mg/m^3 as benzene solubles has been assigned by ACGIH. These materials are designated by ACGIH as human carcinogens.

There have been few attempts to develop exposure standards for PAHs, either individually or as a class. In the occupational setting, a Federal standard has been promulgated for coke oven emissions, based primarily on the presumed effects of the carcinogenic PAH contained in the mixture as measured by the benzene soluble fraction of total particulate matter. Similarly, the American Conference of Governmental Industrial Hygienists recommends a workplace exposure limit for coal tar pitch volatiles, based on the benzene-soluble fraction containing carcinogenic PAH.

The National Institute for Occupational Safety and Health has also recommended a workplace standard for coal tar products (coal tar, creosote, and coal tar pitch), based on measurements of the cyclohexane-extractable fraction. These standards are summarized on the following page.

Substance	Exposure Limit	Agency
Coke oven emissions	150 $\mu g/m^3$, 8 hr time-weighted average	U.S. Occupational Safety and Health Administration
Coal tar products	0.1 mg/m^3, 10 hr time-weighted average	U.S. National Institute for Occupational Safety and Health
Coal tar pitch and volatiles	0.2 mg/m^3 (benzene soluble fraction) 8 hr time-weighted average	American Conference of Governmental Industrial Hygienists

Determination in Air: Collection on a membrane filter, benzene extraction, chromatographic separation, measurement by fluorometry or using a UV detector (A-10).

Permissible Concentration in Water: A drinking water standard for PAH as a class has been developed. The 1970 World Health Organization European Standards for Drinking Water recommends a concentration of PAH not to exceed 0.2 $\mu g/\ell$. This recommended standard is based on the composite analysis of six PAHs in drinking water: fluoranthene, benzo[a]pyrene, benzo[ghi]-perylene, benzo[b]fluoranthene, benzo[k]fluoranthene, and indeno[1,2,3-cd]pyrene.

The US EPA addressed PAHs as one of the 65 priority toxic pollutants (3). They found that there was insufficient data to propose a criterion for the protection of freshwater or of saltwater aquatic life. For the protection of human health, the concentration is preferably zero. An additional lifetime cancer risk of 1 in 100,000 is posed by a concentration of 0.028 $\mu g/\ell$.

Determination in Water: Methylene chloride extraction followed by high performance liquid chromatography (HPLC) with fluorescence or UV detection or gas chromatography (EPA Method 610), or by gas chromatography plus mass spectrometry (EPA Method 625).

Routes of Entry: Inhalation of particulates, vapors.

Harmful Effects and Symptoms: Certain PNAs which have been demonstrated as carcinogenic in test animals at relatively high exposure levels are being found in urban air at very low levels. Various environmental fate tests suggest that PNAs are photo-oxidized, and react with oxidants and oxides of sulfur. Because PNAs are adsorbed on particulate matter, chemical half-lives may vary greatly, from a matter of a few hours to several days. One researcher reports that photo-oxidized PNA fractions of air extracts also appear to be carcinogenic. Environmental behavior/fate data have not been developed for the class as a whole.

It has been observed that PNAs are highly soluble in adipose tissue and lipids. Most of the PNAs taken in by mammals are oxidized and the metabolites excreted. Effects of that portion remaining in the body at low levels have not been documented.

Benzo[a]pyrene (BaP), one of the most commonly found and hazardous of the PNAs has been the subject of a variety of toxicological tests, which have been summarized by the International Agency for Research on Cancer. 50 to 100 ppm administered in the diet for 122 to 197 days produced stomach tumors in 70% of the mice studied. 250 ppm produced tumors in the forestomach of 100% of the mice after 30 days. A single oral administration of 100 mg of nine rats produced mammary tumors in eight of them. Skin cancers have been induced in a variety of animals at very low levels, and using a variety of solvents (length of application was not specified).

Lung cancer developed in 2 of 21 rats exposed to 10 mg/m^3 BaP and 3.5 ppm SO_2 for 1 hour per day, five days a week, for more than one year. Five of 21 rats receiving 10 ppm SO_2 for 6 hours per day, in addition to the foregoing dosage, developed similar carcinomas. No carcinomas were noted in rats receiving only SO_2. No animals were exposed only to BaP. Transplacental migration of BaP has been demonstrated in mice. Most other PNAs have not been subjected to such testing.

Medical Surveillance: Preplacement and regular physical examination are indicated for workers having contact with polynuclear aromatics in the workplace.

Personal Protective Methods: Good particulate emission controls are the indicated engineering control scheme where polynuclear aromatics are encountered in the workplace.

Disposal Method Suggested: Incineration.

References

(1) Olsen, D.A. and Haynes, J.L., *Air Pollution Aspects of Organic Carcinogens*, Report PB-188 090, Springfield, VA, Nat. Tech. Information Service (September 1969).

(2) Goldberg, A.J., *A Survey of Emissions and Controls for Hazardous and Other Pollutants*, Report PB-223 568, Springfield, VA, Nat. Tech. Information Service (Feb. 1973).

(3) U.S. Environmental Protection Agency, *Polynuclear Aromatic Hydrocarbons: Ambient Water Quality Criteria*, Washington, DC (1980).

(4) U.S. Environmental Protection Agency, *Status Assessment of Toxic Organic Chemicals: Polynuclear Aromatic Hydrocarbons*, Report EPA-600/2-79-210L, Cincinnati, OH (December 1979).

(5) National Academy of Sciences, *Medical and Biologic Effects of Environmental Pollutants: Particulate Polycyclic Organic Matter*, Washington, DC (1972).

(6) U.S. Environmental Protection Agency, *Health Assessment Document for Polycyclic Organic Matter*, Research Triangle Park, NC, Environmental Criteria and Assessment Office (1979).

(7) U.S Environmental Protection Agency, *Polynuclear Aromatic Hydrocarbons*, Health and Environmental Effects Profile No. 149, Office of Solid Waste, Washington, DC (April 30, 1980).

(8) International Agency for Research on Cancer, *IARC Monographs on the Carcinogenic Risks of Chemicals to Humans*, Lyon, France, 3, 91 (1973).

POLYTETRAFLUOROETHYLENE DECOMPOSITION PRODUCTS

Description: Thermal decomposition of the fluorocarbon chain in air leads to the formation of oxidized products containing carbon, fluorine and oxygen. See the entry under "Carbonyl Fluoride" to cite one example.

DOT Designation: —

Synonyms: Teflon® decomposition products.

Potential Exposures: Those involved in exposure of fluorocarbon plastics at high temperatures. Exposure can come from smoking cigarettes contaminated with PTFE particles. So far as is known, overheating the coatings on cooking utensils has not been a problem (A-34).

QUARRY
BERRY COLLEGE
BATTEY STATE HOSPITAL
Water Tank
Substation
GEORGIA
WOODBINE AVE
BM 641
BM 648
LAVENDER
REDMOND RD
ROBIN ST
OAKWOOD ST
NORTH ELM ST
Boys Club
Fire Sta
Elm St Sch
Radio Tower
SOUTHERN
BM 610
W 11TH ST
TURNER MCCALL
Hospital
ROME
Athletic Field
Police Sta
Gaging Sta
Radio Towers (WLAQ)
Norcross Chapel
COOSA RIVER
Coosa Country Club
Myrtle Hill Cemetery
ETOWAH
East Rome High Sch
Radio Tow (WRON
Parking
Riverside Sch
Pumping Sta
Filtration Plant
Burwell Creek
OOSTANAULA RIVER
Fire Sta
Gaging Sta
ARAGON 15 MI
SIX MILE 6 MI.
CEDARTOWN 17 MI.
(ROME SOUTH)
3952 II NW
12'30"
10'
SCALE 1:24 000
1 MILE
7000 FEET
1 KILOMETER
CONTOUR INTERVAL 10 FEET
MN
GN
1°01'

UNSCANNABLE

MEDIA

(PHOTOGRAPHS)