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August 6, 2009

Michael Hom, Environmental Engineer
Clean Water Enforcement Branch
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Re: Information Request – Section 308 of the Clean Water Act
Dalton Utilities Land Application System

Dear Mr. Hom:

Enclosed with this letter is information from Dalton Utilities to further respond to EPA's May 20, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosures include an August 5, 2009, letter with a certification signed pursuant to the Request. The information supplements the prior responses to the Request and provides information requested during the July 27, 2009, meeting between representatives of Region 4 and Dalton Utilities.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,

Lee A. DeHihns, III

LAD:gba
Enclosures

LEGAL01/13119678v1

Dalton
UTILITIES

August 5, 2009

Mr. Michael Hom, Environmental Engineer
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Follow Up to July 27, 2009, Meeting Between EPA and Dalton Utilities

Dear Mr. Hom,

In response to your request during the July 27, 2009, meeting between representatives of the United States Environmental Protection Agency (EPA), Georgia Department of Natural Resources Environmental Protection Division (GA EPD), Sustainability Division Georgia Department of Natural Resources, and Dalton Utilities, please find attached marked as Attachment A the latitudes and longitudes, as collected using Global Positioning System (GPS) equipment, that correspond to the locations of the samples collected as a part of the 308 Information Request dated May 20, 2009. The latitudes and longitudes are in the North American Datum (NAD) 1983 State Plane Coordinate System.

As indicated during the meeting, Dalton Utilities collected samples at various points in our composting operation to ascertain the potential levels of perfluoridated chemicals (PFCs) in the compost. The results of these analyses are provided herein as a bound report titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Lot # D9E280210 dated June 30, 2009, which contains 416 pages and is attached as Attachment B for your review. In this report, the samples are identified as 1, 2, 3, and 4 corresponding to fresh, dried biosolids cake before the addition of wood waste and finished compost aged approximately 6, 12, and 18 months, respectively. As discussed, the test results would indicate to the layman that the concentration in solids is decreasing as you get closer to the present product from our composting operation, supporting the report from industry that they have stopped using PFOA, or C-8, based chemistry.

Upon review of this data, Dalton Utilities collected additional samples of compost to be analyzed using a modified Toxicity Characteristic Leaching Potential (TCLP) test with deionized water as the leaching fluid to determine the leaching potential, if any, of PFOA

and PFOS from the finished compost. As we discussed during the meeting, Dalton Utilities will submit the analytical report for the TCLP testing to you once the final results have been received by Dalton Utilities. Additionally, Dalton Utilities requests guidance from the EPA on other methodologies that can be used for determining the leaching potential of PFOA and PFOS from the finished compost.

Further, Dalton Utilities is segregating the existing inventory of finished compost on-site as stated in the meeting. Dalton Utilities requests guidance from EPA on the appropriate or allowable disposal options for the current inventory of compost. Time is off the essence in regards to this request. Dalton Utilities also requests EPA explore the option of incineration of the compost to reduce or eliminate PFCs in the sludge and compost and advise Dalton Utilities of the results of this research.

Additionally, Dalton Utilities, in concert with our third party preparer and distributor, has compiled a summary of the companies or individuals that obtained the finished compost. This information is contained in Attachments C and D, respectively.
In response to your request during the meeting, please find attached the protocol that is being used by Dalton Utilities to conduct a well survey to identify drinking water wells in the immediate vicinity of the Land Application System (LAS) (see Attachment E). As outlined in this protocol, Dalton Utilities is utilizing a telephonic survey followed by a site visit to confirm the presence and usage of a drinking water well. Upon obtaining permission from the resident, samples are being collected by qualified personnel in accordance with EPA's Standard Operating Procedure for Potable Water Supply Sampling, SESDPROC-305-R1, and analyzed for the PFCs listed in your email correspondence dated June 17, 2009, to ascertain the concentrations of PFCs in the private drinking water wells, if any. The protocol also details the actions that will be taken upon receipt of the test results.

For private drinking water wells with concentrations of PFOA and PFOS below the detection limits, no further action will be necessary. For private wells in which the concentration is above the detection limit and below the published health advisory levels for either PFOA or PFOS, Dalton Utilities will seek additional guidance from EPA on any necessary additional actions. For private wells in which the concentration is above the published health advisory levels for either PFOA or PFOS, Dalton Utilities will ensure the residents are provided with access to public water made available as soon as practical.

Dalton Utilities has also collected influent, or untreated wastewater, samples at each of our wastewater treatment facilities as a part of potential source assessment of our wastewater collection system that is being conducted with the Sustainability Division of the Georgia Department of Natural Resource (DNR). Dalton Utilities will also submit the analytical report for this testing to you once the final results have been received by Dalton Utilities.

In light of the recent focus on PFCs and their potential health effects, Dalton Utilities requests EPA develop and publish a method to be standardized and validated to

accurately and consistently analyze for PFCs in all types of media. The lack of a true standardized method for these analyses has resulted in an extremely limited number of contract laboratories in the United States having the capability and willingness to analyze for these compounds and consequently, limiting options and greatly inflating costs to entities requesting these types of analyses. Creating and publishing a national or global standardized method would additionally increase the accuracy and precision of the analyses and reduce the variation between different testing facilities.

As always, Dalton Utilities will update you as the projects discussed with you proceed. If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

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

Sincerely,

Don Cope
President & CEO

Attachments (5)

C: Dr. Carol Couch, Georgia Environmental Protection Division (cover letter only)
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
Lee A. DeHihns, Esq.

Dalton Utilities
GPS Coordinates for Sampling Locations

Sample ID	Longitude	Latitude
MW D-1	-84.92873088	34.72341765
MW D-11	-84.87718472	34.64597870
MW D-2	-84.92126220	34.71669857
MW D-3	-84.93050111	34.71451112
MW D-4	-84.88369563	34.69737980
MW D-6	-84.88689859	34.68481459
MW D-9	-84.88008176	34.66381471
MW M-1	-84.92370822	34.71937169
MW M-10	-84.91426635	34.69817198
MW M-11	-84.90828193	34.69553647
MW M-12	-84.89883406	34.70544397
MW M-13	-84.88077989	34.67772824
MW M-14	-84.86131912	34.68127912
MW M-17	-84.84549946	34.66549398
MW M-2	-84.91494930	34.71088097
MW M-3	-84.89431146	34.69956979
MW M-4	-84.86717290	34.67057937
MW M-5	-84.86092886	34.65131120
MW M-6A	-84.88940249	34.65443696
MW M-7	-84.91399311	34.70947732
MW M-8	-84.91201636	34.70896822
MW M-9	-84.92438465	34.70490328
MW U-1	-84.92584054	34.72049563
SP AC-14	-84.91598325	34.72353865
SP AC-15	-84.91135616	34.71958517
SP AC-2	-84.93256246	34.72246676
SP AC-4	-84.93001332	34.71843709
SP AC-5	-84.93006617	34.72093077
SP BA-2	-84.89918329	34.70241452
SP BA-4	-84.89910912	34.69717700
SP BB-12	-84.88752877	34.69470744
SP BB-13	-84.88850987	34.68503033
SP BB-9	-84.88416644	34.68259624
SP CA-15	-84.88838137	34.65823326
SP CA-2	-84.85503682	34.66131550
SP CB-12	-84.84050602	34.67238359
SP CB-14A	-84.86675963	34.69345074
SP CB-3	-84.87744609	34.68456909
River R1	-84.86398781	34.70873209
River R2	-84.92829475	34.66708586
River R3	-84.83980551	34.68145955
River R4	-84.89268326	34.70466668
AC-13 SOIL	-84.91755973	34.72078172
AC-6 SOIL	-84.92685556	34.71856011
BA-11 SOIL	-84.89473083	34.70080513
BA-12 SOIL	-84.89160367	34.69435967
BA-5 SOIL	-84.89841800	34.68742867
BB-12 SOIL	-84.88577093	34.69388329
BB-13 SOIL	-84.88806370	34.68338295
BB-9 SOIL	-84.88280851	34.68358803
CA-12 SOIL	-84.86751967	34.67485863
CA-5 SOIL	-84.86229015	34.65476146
CA-9B SOIL	-84.88690298	34.65928470
CB-13 SOIL	-84.86443374	34.67810402
CB-14A SOIL	-84.86850419	34.69108544
CB-4 SOIL	-84.87490759	34.67831926

Compost Manifest Log

Transporter Name	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
All Seasons	407 Central Ave.	Dalton	GA	30720	80,000	1/26/2007
Allen C Show Place					50,000	5/24/2007
Autry Farms	352 West Watts Rd	Ringgold	GA	30736	14,656,000	9/30/05 - 6/11/09
Baker					25,000	5/31/2007
BASA/Frank					18,000	4/24/2008
Beaty Fertilizer & Chemical Company	PO Box 2516	Cleveland	TN	37320	3,214,000	11/15/05 - 5/29/09
Big-D-Trucking	3451 Cleveland Hwy	Dalton	GA	30721	287,000	6/12/06 - 3/27/08
Biggs Trucking	6903 Ooltewah Georgetown Road	Ooltewah	TN	37363	501,000	4/28/06 - 9/29/08
BNT Trucking					50,000	10/17/2007
Bullins Trucking	1748 Benton Pike NE	Cleveland	TN	37323	140,000	6/23/05 - 9/16/05
C&S Construction					48,000	11/3/2006
Cawood Enterprizes	PO Box 363	Tunnel Hill	GA	30755	216,000	4/18/08 - 11/20/08
Chastain Construction					25,000	4/9/2008
Chatsworth Garden	624 N. 4th Avenue	Chatsworth	GA	30705	50,000	9/13/2007
Chatsworth Salvage	4777 Hwy. 52 Alt.	Chatsworth	GA	30705	7,000	4/11/06 - 4/14/06
Circle H Trucking	746 River Street	Ellijay	GA	30540	5,811,000	2/23/05 - 6/3/09
Dalton Utilities	1200 VD Parrott Pkwy	Dalton	GA	30722	1,774,300	6/8/05 - 6/30/09
Dawnville Elem. - Brad Mathis	1380 Dawnville Rd. N.E.	Dalton	GA	30722	1,960	11/3/06 - 11/8/06
E&P excavation	7610 Ooltewah Georgetown Rd.	Ooltewah	TN	37363	145,000	4/8/08 - 4/17/09
Ellis Construction	241 Mountain View Spurr	Chatsworth	GA	30705	80,000	8/23/2005
Enterprize					6,000	3/27/2008
Five View Soil					55,000	7/25/2006
GT Construction	372 Gibson Rd.	Dalton	GA	30721	55,000	5/19/06 - 6/19/06
Harvest Farms	PO Box 40	Harrison	TN	37341	2,152,800	1/7/05 - 10/31/05
Hay H Landscape					20,000	5/19/2006
Hearon Trucking					150,000	4/16/08 - 4/23/08
Hickman Angus Farms	4400 Brittsville Rd.	Georgetown	TN	37336	200,000	5/23/2008 - 6/27/08
Hwy 71 Landscape & Supply	3440 C Cleveland Hwy	Dalton	GA	30721	600,000	5/30/07 - 11/6/08
Imperial Landscape	910 GA Hwy 2	Tunnel Hill	GA	30755	262,000	5/12/08 - 11/20/08
James Milling Trucking	1027 West Lewis Street				1,783,000	3/29/06 - 5/19/09
James Wright Const					901,000	8/29/08 - 8/30/08
Greenworks Landscape					310,000	12/14/06 - 9/22/08
Jerrys Hauling					2,348,000	4/24/06 - 10/14/08
John Deere Landscaping	650 Stephenson Hwy	Troy	MI	48083	2,450,000	3/31/06 - 10/22/08
Kawood Ent.	PO Box 363				16,000	2/6/09 - 2/10/09
Keller Outdoors	190 North Park Drive	Chatsworth	GA	30705	520,000	5/17/06-7/26/06
Kennie Hayduk Landscaping					50,000	4/12/2007
L & L Bulk					50,000	10/5/2005
Lamar Light Trucking					74,400	3/15/05 - 3/21/05
Larry Dixon Construction	5800 Red Bud Rd. NE	Ranger	GA	30734	50,000	12/13/2007
Lovett					70,000	9/21/2005
M & J Trucking					508,000	8/22/06 - 7/15/08
M&L Trucking					24,000	6/13/2005
M&S Trucking					25,000	11/13/2007
Mashburn Tree Service	1303 Boynton Drive	Ringgold	GA	30736	1,586,000	10/17/07 - 6/22/09
Mason Construction	2722 Old Tilton Rd.	Dalton	GA	30720	1,911,000	2/17/07 - 3/24/09
Milling Trucking	Mountian View Rd.	Ooltewah	TN	37363	114,000	5/24/06 - 5/30/06
P. F. Moon Construction	500 Ackermand Rd.	Rincon	GA		272,000	3/7/06 - 5/8/08
Mountain Crest					58,000	8/20/2008
Mountain View Landscape					50,000	8/22/2008
North Ga. Equipment					1,147,000	3/1/06 - 4/20/07

Attachment C to August 5, 2009, letter to Mr. Hom

Compost Manifest Log

Transporter Name	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Ooltewah Nursery	5829 Main Street	Ooltewah	TN	37363	550,000	5/24/07 - 6/5/07
Parrish Outdoors	796 Lafayette Street				3,000	3/11/2009
Patterson Services					8,867,000	12/16/05 - 3/28/08
Perone	River Rd. North East	Dalton	GA	30720	360,000	11/18/05 - 12/5/05
Poteet Brothers	1101 Mackey Avenue	Chattanooga	TN	37421	60,000	2/11/2009
Pro Lawn	1326B US 41 South	Calhoun	GA	30701	1,006,000	11/10/06 - 5/21/08
Pro Schrub	PO Box 1128	Rocky Face	GA	30740	18,000	9/14/06 - 7/11/09
Professional Tree Service	1100 West Tennessee Avenue	McCaysville	GA	30555	25,000	5/15/2009
Quinn's Greenhouse	10219 Hwy 58	Ooltewah	TN	37363	64,800	3/10/06 - 4/12/06
R&E Const.	1745 Lower Kings Bridge Road	Dalton	GA	30721	100,000	1/15/2009
R&R Trucking					459,000	5/2/06 - 5/22/09
Rock and Earth	117 Roundnob Drive	Rocky Face	GA	30740	77,000	5/16/06 - 6/5/06
Shephard Mulch/Lamar Shephard					11,587,000	2/1/06 - 6/30/09
Show Place Homes					400,000	11/6/06 - 9/17/07
SINDT Trucking	145 Sahara Lane	Chatsworth	GA	30705	40,000	10/5/2005
Southern Scapes	3373 Cleveland Highway	Dalton	GA	30721	1,000	7/21/2009
Tates Bobcat Service	352 West Watts Rd	Ringgold	GA	30736	203,300	7/8/08 - 6/17/09
Turf Master	Hwy 30	Athens	TN	37303	750,000	3/28/08 - 3/4/09
Trio Equipment	317 Bells Ferry Rd.	Rome	GA		250,000	6/22/09 - 6/26/09
Weedon Trucking					3,330,000	11/2/05 - 5/20/09
Willow Tree Farm					1,355,000	5/21/08 - 8/14/08
Winnwood	3628 Gordon Springs Rd.				100,000	5/24/07 - 5/25/07
Yard Works					24,000	11/27/2006

Bagged Products Shipped by Harvest Farms/Circle H Trucking

Transporters Name	Street Address	City	State	Zip Code	Date Off Site
41 Feed & Garden Center	1714 South Dixie Rd.	Dalton	GA	30720	4/05/05 - 5/12/05
Ace Hardware of Lafayette	512 South Main Street	Lafayette	GA	30728	3/02/05 - 4/19/05
Ace Hardware of Ooltewah	3231 Lee Hwy.	Ooltewah	TN	37363	2/07/05 - 10/25/05
Ace Hardware of Rome	1804 Turner McCall Blvd.	Rome	GA	30161	
B.L. Mullinax Landscape Supply	1886 Peachtree Parkway	Cumming	GA	30041	1/4/2005
Bay Outdoors	205 Vanns Town Drive	Chatsworth	GA	30705	1/3/05 - 10/31/05
Belle Meade Garden Center	4503 harding Rd.	Nashville	TN	37205	10/19/2005
Burgess Feed & Farm	Hwy 411 S.	Benton	TN	37307	2/7/05 - 2/7/05
Calhoun Farm Supply	210 Niking St.	Calhoun	GA	30701	3/11/05 - 3/11/05
Classic Gardens/DBA The Greenery	1855 Carson Rd.	Birmingham	AL	35215	2/28/05 - 6/15/05
Collins Hardware	17616 US Hwy 72	Athens	AL	35011	5/10/05 - 5/10/05
Deep Springs Nursery	1786 Beaverdale Rd.	Dalton	GA	30721	5/18/2005
East Ridge Hardware	5337 Ringgold Rd.	East Ridge	TN	37421	9/29/2005
Florida Garden Products	PO Box 622708	Oviedo	FL	32762	1/13/05 - 1/13/05
Floyds Hardware	10040 Dayton Pike	Soddy Daisy	TN	37379	2/21/05 - 4/24/06
Greater Chattanooga Landscape	235 Serena Drive	Hixson	TN	37343	5/25/05 - 5/25/05
Green Farm & Garden	390 Maple Ave.	Oliver Spings	TN	37840	3/25/05 - 3/25/05
Hewitt Garden Center	2525 Hillsboro Rd	Franklin	TN	37069	3/2/05 - 5/3/05
Holcombs Garden Center	2705 Battlefield Parkway	Fort Oglethorp	GA	30742	1/24/05 - 8/8/05
John Deere Landscapes	650 Stephenson Hwy	Troy	MI	48083	2/7/05 - 4/16/05
Keller Outdoors	190 North Park Drive	Chatsworth	GA	30705	2/2/2005
Mayo Garden Center	4718 Kingston Pike	Knoxville	TN	37919	4/18/05 - 8/9/05
Moore & Moore West	8216 Hwy 100	Nashville	TN	37221	2/8/05 - 10/14/05
					2/5/05 - 6/6/05

Attachment C to August 5, 2009, letter to Mr. Horn

Compost Manifest Log

Transporter Name	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Ooltewah Nursery	5829 Main St.	Ooltewah	TN	37363		3/2/05 - 9/30/05
Quinns Greenhouse	1100 West Tennessee Ave.	McCaysville	GA	30555		3/24/05 - 3/10/06
Rosewood Garden	1229 West Walnut Ave.	Dalton	GA	30720		3/23/05 - 10/7/05
Sloans Home Center	4500 Hwy 411 Unit 4	Madisonville	TN	37354		2/28/05 - 2/28/05
South Scape	324 Burton St.	Jasper	GA	30143		1/2/05 - 9/26/05
Southern Home & Garden/North River Nursery	4529 Hixson Pike	Chattanooga	TN			4/6/05 - 9/30/05
Southern Importers	PO Box 8579	Greensboro	NC	27419		2/905 - 8/29/05
Tennessee Farmers Cooperative	PO Box 3003	LaVergne	TN	37086		2/8/05 - 4/26/06
The Barn Nursery of Chattanooga	2410 South Hickory St.	Chattanooga	TN	37406		4/1/05 - 6/1/05
U.S. Lawns	PO Box 636	Ooltewah	TN	37363		2/10/05 - 4/28/06

Compost Manifest Log

	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Betty Ann Clark	812 Atkinson Dr.	Dalton	GA	30720	1,100	4/29/09 - 4/30/09
Bianca Archuleta	107 E. Plantation St.	Chatsworth	GA	30705	1,000	3/23/09 - 4/6/09
Bill Mckenney	1 Boys Mtn. Road	Ringgold	GA	30736	500	4/9/2009
Bill Russel					1,000	5/9/2005
Brent Dean					1,000	3/13/2008
Caleb Martin	241 Southern Circle	Chatsworth	GA	30705	500	4/2/2005
Carl Mashburn	2216 Decatur Pike	Athens	TN	37303		
Chad Garrison	1549 Dawnville Road	Dalton	GA	30721	10,000	2/24/2007
Chris Owens	396 Dr Johnson Rd.	Crandall	GA	30711	9,060	1/25/07 - 3/9/07
Cims	North Goose Hill Lane	Rocky Face	GA	30740	1,000	4/24/2009
Dalton Utilities					1,774,300	6/8/05 - 6/30/09
Dan Findley	449 Scarlett Dr	Dalton	GA	30721	1,000	4/20/2005
Darryl Williams	580 Reed Rd.	Dalton	GA	30720	5,500	3/22/08 - 4/18/09
David White/D.U.	1141 County Line Road	Resacca	GA	30735	2,000	2/13/2009
Don Cope	155 Enoch Trail	Rocky Face	GA	30740	150	
Donald Akers	4068 Keith valley Rd.	Cohutta	GA	30710	7,200	2/24/2006
Dr Hodges					430,000	9/24/08 - 10/28/08
Frank Kovach	910 Beaverdale Rd.	Dalton	GA	30721	1,000	6/6/09 - 6/8/09
Gary Hill	PO Box 342	Oakman	GA	30732	500	6/16/2009
Heath Brewster					5,000	3/23/2009
Individual					1,930,330	3/25/05 - 10/4/07
James Wilson	3006 Davis Rd.	Rocky Face	GA	30740	126,000	1/15/2008
Jason Coleman					5,000	5/26/07 - 10/31/08
Jason Garland	416 Hasty Drive	Tunnel Hill	GA	30755	200	4/24/2009
Jeff Cobb					28,800	2/2/2006
Jeff Fountian	2341 Gail Lane				3,600	3/9/2006
Jeff McNeely	3158 Morris Rd.	Rocky Face	GA	30740	20,000	4/29/05 - 6/10/07
Jenifer					1,000	4/9/2005
Jeremy Peden	34 Stone Brook Path	Chatsworth	GA	30705	48,500	10/11/06 - 4/26/09
Joe Stevens	532 Wooten Rd.	Ringgold	GA	30736	700	3/6/2005
Joe Woody	454 Jim Petty Rd.	Crandall	GA	30711	1,000	4/29/2005
John Burgess	624 Pine Oak Dr.				40,500	6/5/07 - 4/16/09
Johnny Davenport	3451 Cleveland Hwy	Dalton	GA	30721	267,000	6/1/06 - 6/8/06
Juan Montez	PO Box 236	Tunnel Hill	GA	30755	30,000	3/21/2009
Ken Finch	2417 Shahan Dr.	Dalton	GA	30705	4,500	4/7/05 - 4/9/05
Ken Helton	3180 Helton Rd.	Rocky Face	GA	30740	1,000	2/18/2008
Larry Patton					50,750	4/5/07 - 4/29/08
Louis Dykes	145 Sahara Lane	Chatsworth	GA	30705	3,000	10/3/06 - 5/23/08
Marion Bryant	498 Palomino Drive	Dalton	GA	30720	1,500	4/9/09 - 5/13/09
Mark Hall	2742 Old Tilton Rd.	Dalton	GA	30720	1,000	3/4/2008
Mathew Warner	194 Cotton Circle	Chatsworth	GA	30705	1,000	4/13/2005
McDaniel, Lori	1975 Highway 52E	Chatsworth	GA	30705	100,000	2/16/2006
Mickey Sisk	484 McCamy Rd	Chatsworth	GA	30705	42,500	10/18/06 - 3/25/07
Mike Croxall					2,000	5/27/08 - 5/28/08
Mike Marris					50,000	10/17/2008
Pat Camp					800	6/1/2007
Patsy Gordon	301 Nob North		GA		500	1/26/2009
Phillip H. Pheifer	41 Promise Heights Drive	Ringgold	GA	30736	525	4/2/09 - 5/22/09
Ralph England	PO Box 2095	Chatsworth	GA	30705	500	7/24/2005
Ray Sexton	923 Morgan Dr.	Tunnel Hill	GA	30755	1,500	9/26/08 - 4/16/09
Richard Dodson	5460 Fredrick Rd.	Cohutta	GA	30710	500	4/20/2005

Attachment D to August 5, 2009, letter to Mr. Hom

Compost Manifest Log

	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Robert Deforest	41 Promise Heights Drive	Ringgold	GA	30736	1,000	4/29/09 - 5/19/09
Robert Ledford	208 Mountain Trail	Lafayette	GA	30728	1,000	2/19/05 - 4/23/09
Rod Hensley	746 River Street	Ellijay	GA	30540	324,000	10/18/07 - 3/22/09
Russell Witherow	298 Katie Lane	Chatsworth	GA	30705	500	4/17/2009
Sid Abernathy	1504 Elaine Way	Dalton	GA	30720	1,000	4/27/09 - 5/15/09
Dustin Sharp	143 Ladd Springs	Cleveland	TN	37323	500	10/31/2008
Steve Bailey	3906 Parker Rd.	Dalton	GA	30721	1,800	3/11/2007
Steve Bolles					200,000	4/7/08 - 4/28/08
Steve Bratton	484 Bethany Rd.	Dalton	GA	30721	500	4/22/2009
Steve Thompson	1038 Jayis Way	Ringgold	GA	30736	100,000	3/20/07 - 3/27/07
Sue Dale	166 Skylark Dr.	Chatsworth	GA	30705	500	3/20/2009
Terry Earley	1095 Houston valley Rd.	Rocky Face	GA	30740	14,750	3/29/06 - 5/15/09
Terry Moody	325 Woodbranch Dr.	Dalton	GA	30721	1,300	3/27/06 - 3/13/08
Tim Alexander					1,000	6/12/2006
Tim Jones					30,000	6/4/2007
Todd Hensley	5397 Willbanks Rd.	Chatsworth	GA	30705	1,000	3/19/2009
Tony Dale	166 Skylark Dr.	Chatsworth	GA	30705	3,500	3/13/09 - 3/23/09
Wade Hart	30 Arrowhead Dr.	Chatsworth	GA	30705	2,000	3/3/2005
Wally Babb	702 Furnance Creek	Lafayette	GA	30728	500	3/3/2005
William Earley	55 South Lake Dr.	Chatsworth	GA	30705	125,800	3/5/05 - 3/3/08

Dalton Utilities

Private Drinking Water Well Survey Protocol

July 2009

Attachment E to August 5, 2009, letter to Mr. Hom

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Executive Summary

Dalton Utilities, located in Dalton, Georgia, operates water treatment, wastewater treatment, natural gas, electric, and telecommunication systems that serve residents in the City of Dalton in addition to residents in Whitfield, Murray, Gordon, and Catoosa Counties.

Dalton Utilities wastewater operations is comprised of approximately 295 miles of pipe, 5,544 manholes, and 35 lift stations in the wastewater collection system, five wastewater treatment facilities, and 9,800 Land Application System (LAS). The largest three wastewater treatment plants (WWTP), Abutment WWTP, Riverbend WWTP, and Loopers WWTP are part of Dalton Utilities Land Application System (LAS) which is a non-discharging system.

These three WWTPs take wastewater from local industries and the residents of the City of Dalton and parts of Whitfield County and process the wastewater utilizing biological treatment. The treated wastewater or effluent is then transported to the canal or reservoir located at the LAS. The effluent flows through the canal system to the pump stations where the effluent is chlorinated and then pumped to various sprayfields. The effluent is distributed via underground piping and sprayed using impact sprinklers onto the land where the effluent infiltrates the soil surface and subsurface providing additional treatment.

In May 2009, Dalton Utilities collected samples at various locations on the LAS. In response to sample results obtained from the ground water monitoring wells on the LAS, Dalton Utilities decided to conduct a drinking water well survey to identify private drinking water wells in the immediate vicinity of the LAS that have the potential to have been impacted by the ground water coming from the LAS.

The private drinking water well sample results will be used to determine the levels of Perfluoridated Compounds (PFC), if any, in the private wells and used to evaluate what additional steps, if any, need to be taken to provide safe drinking water to these residents.

Drinking Water Well Survey Protocol

1. Identification of Residences

   The residences immediately adjacent to and potentially hydrologically downstream of Dalton Utilities Land Application System (LAS) were identified through publicly available maps and records. The addresses of the residences were then cross referenced with public drinking water systems to determine if public drinking water was available and being utilized. Locations with no availability of public water or suspected to have a private drinking water well were recorded. The initial testing will focus on wells immediately adjacent to the LAS. As results are obtained and if necessary based on these results, the area of investigation will be expanded accordingly.

2. Telephonic Notification

   Identified locations are to be contacted by Dalton Utilities via telephone and informed that the two chemicals for which there is a United State Environmental Protection Agency Health Advisory, PFOA and PFOS, have been found in the groundwater at our land application site. The individuals will then be asked if public water is available or if private well water is used. If a private well is utilized, a convenient time to sample the well will be scheduled. An example of the conversation is provided as Attachment A.

3. Door-to-Door Notification

   For locations that could not be reached via telephone, Dalton Utilities will go door-to-door and give residents the same notification as in the telephonic notification.

4. Site Visit

   Once a convenient time has been scheduled, Dalton Utilities will visit the location and provide the residents with an information packet consisting of the frequent questions printed off of the United States Environmental Protection Division (EPA) website on these chemicals as well as obtain permission and access to sample the private well.

5. Sampling Protocol

   Upon obtaining permission, Dalton Utilities will collect samples from the private well in accordance with the EPA's Standard Operating Procedure for Potable Water Supply Sampling, SESDPROC-305-R1. Latitudes and longitudes, as collected using Global Positioning System (GPS) equipment, will also be obtained for each sample collection location. The sampling will be performed by qualified personnel with experience in the field and will be collected using bottles

provided by the contract laboratory specific for the analyses of the PFCs listed in Attachment B. Upon collection, the samples will be placed in an appropriate container, packed in wet ice, and shipped to TestAmerica Laboratories, Inc. in Denver, Colorado for the analyses of PFCs per TestAmerica method DV-LC-0012. Quality Control of the analyses will be conducted in accordance with TestAmerica's QC program and procedures.

6. Analysis of Well Survey Data

Analytical information obtained as part of this drinking water well survey will be reviewed by Dalton Utilities and compared to the published EPA Heath Advisory levels for PFOA and PFOS. If it is determined that the concentration of the sample from the private well is below the detection limits for both PFOA and PFOS, no further action will be necessary. If it is determined that the concentration of any PFCs in the sample from the private well is above the detection limit and below the published health advisory levels for either PFOA or PFOS, Dalton Utilities will seek additional guidance from EPA on any necessary additional actions. If it is determined that the concentration of the sample from the private well is above the published health advisory levels for either PFOA or PFOS, Dalton Utilities will ensure the residents are provided with bottled water and access to public water made available as soon as practical.

7. Follow Up Notification

Dalton Utilities will share the results of the testing as well as any additional actions to be taken with the residents after receiving and reviewing the final results of the analytical testing.

8. Report to EPA

A full report including the location of private drinking water wells, the results of all analyses, and any follow up actions taken will be provided to EPA once the final analytical results are received.

Attachment A

Telephonic Notification Script

Good Morning/Afternoon Mr/Mrs. _____,

This is ____ with Dalton Utilities.

We have identified two chemicals in groundwater at our land application site for which United States Environmental Protection Agency (USEPA) recently issued Health Advisories. USEPA studies of exposure to the chemicals have not shown any adverse health outcomes in humans. Just to be safe, we are conducting a drinking water well survey of residences in the vicinity and would like to ask you a few questions.

1. Do you use a private well for drinking water? (Yes – Go to # 2; No – Thank them for their time and end the call)

2. Do you have a connection to a source of public drinking water? (No – Go to # 3; Yes - read below)

   Please use your public drinking water connection for drinking, cooking, and activities such as brushing teeth until we have finished our investigation and provide you with further information. Thank you for your time. (End call)

3. We would like to schedule a time to test your well to determine if it has been impacted by these two chemicals. When would be convenient for someone from Dalton Utilities to obtain access to your well for sampling? (Schedule day/time). We will also provide to you some US EPA frequently asked questions and answers regarding the chemicals for which we are testing. . Additional information is available on the US EPA's website which is listed on the handout for your convenience.

4. If you have any additional question, you may contact me at _____. (Record their name, date, and time.)

Attachment B

List of Perfluoridated Compounds (PFC) for Chemical Analyses

As Revised June 17, 2009, by EPA

Compound	Acronym
Perfluorobutanoic acid	C4
Perfluoropentanoic acid	C5
Perfluorohexanoic acid	C6
Perfluoroheptanoic acid	C7
Perfluorooctanoic acid	C8
Perfluorononanoic acid	C9
Perfluorodecanoic acid	C10
Perfluoroundecanoic acid	C11
Perfluorododecanoic acid	C12
Perfluorotridecanoic acid	C13
Perfluorotetradecanoic acid	C14
Perfluorobutane sulfonate	PFBS
Perfluorohexane sulfonate	PFHxS
Perfluorooctane sulfonate	PFOS
Perfluoroctane sulfonamide	PFOSA