27297

PRELIMINARY ASSESSMENT

FOR

WARRENTON RUBBER COMPANY SITE

NFRAP
7/25/1996

101 FLOWER STREET
WARRENTON, WARREN COUNTY, GEORGIA

EPA I.D. GAD984321513

Prepared For:

U.S. Environmental Protection Agency

Region IV

Prepared By:

Danny Heater & Madeleine Kellam

Georgia Environmental Protection Division
Hazardous Waste Management Branch
March 31, 1996

Reviewed By:

TABLE OF CONTENTS

1.0 INTRODUCTION 1

2.0 SITE DESCRIPTION OPERATIONAL HISTORY, AND WASTE CHARACTERISTICS 1

2.1 LOCATION 1

2.2 SITE DESCRIPTION 1

2.3 OPERATIONAL HISTORY AND WASTE CHARACTERISTICS 3

3.0 GROUNDWATER PATHWAY 5

3.1 HYDROGEOLOGIC SETTING 5

3.2 GROUNDWATER TARGETS 5

3.3 GROUNDWATER CONCLUSIONS 6

4.0 SURFACE WATER PATHWAY 6

4.1 HYDROLOGIC SETTING 6

4.2 SURFACE WATER TARGETS 7

4.3 SURFACE WATER CONCLUSIONS 7

5.0 SOIL EXPOSURE PATHWAY 7

5.1 PHYSICAL CONDITIONS 7

5.2 SOIL EXPOSURE TARGETS 8

5.3 SOIL EXPOSURE CONCLUSIONS 8

TABLE OF CONTENTS (Cont'd.)

6.0 AIR EXPOSURE PATHWAY 8

6.1 PHYSICAL CONDITIONS 8

6.2 AIR EXPOSURE TARGETS 8

6.3 AIR EXPOSURE CONCLUSIONS 8

7.0 SUMMARY AND CONCLUSIONS 9

REFERENCES 10

FIGURES

FIGURE 1. Site Location Map - Warrenton Rubber Company Site 2

FIGURE 2. Site Sketch - Warrenton Rubber Company Site 4

TABLES

TABLE 1. Private Wells Within 4-Mile Radius of Warrenton Rubber Company Site 6

APPENDICES

A. U.S. Geological Survey 7.5 Minute Series Topographic Map

B. Photographs: Warrenton Rubber Site Reconnaissance, January 8, 1996

C. Warrenton Rubber Site Reconnaissance Field Notes, January 8, 1996

D. Selected References

E. EPA Potential Hazardous Waste Site PA Form and Score Sheet

PRELIMINARY ASSESSMENT

WARRENTON RUBBER COMPANY SITE
WARRENTON, WARREN COUNTY, GEORGIA

1.0 INTRODUCTION

Under authority of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), the Georgia Environmental Protection Division (EPD), Hazardous Waste Management Branch conducted a Preliminary Assessment (PA) at the Warrenton Rubber Company site located in Warrenton, Warren County, Georgia. The EPA I.D. No. is GAD984321513. The purpose of the PA was to collect information concerning conditions at the Warrenton Rubber site sufficient to assess the threat posed to human health and the environment, and to determine the need for additional investigation under CERCLA/SARA, or other action. The scope of this investigation included a review of available file information, a comprehensive target survey, and site reconnaissance.

2.0 SITE DESCRIPTION OPERATIONAL HISTORY, AND WASTE CHARACTERISTICS

2.1 LOCATION

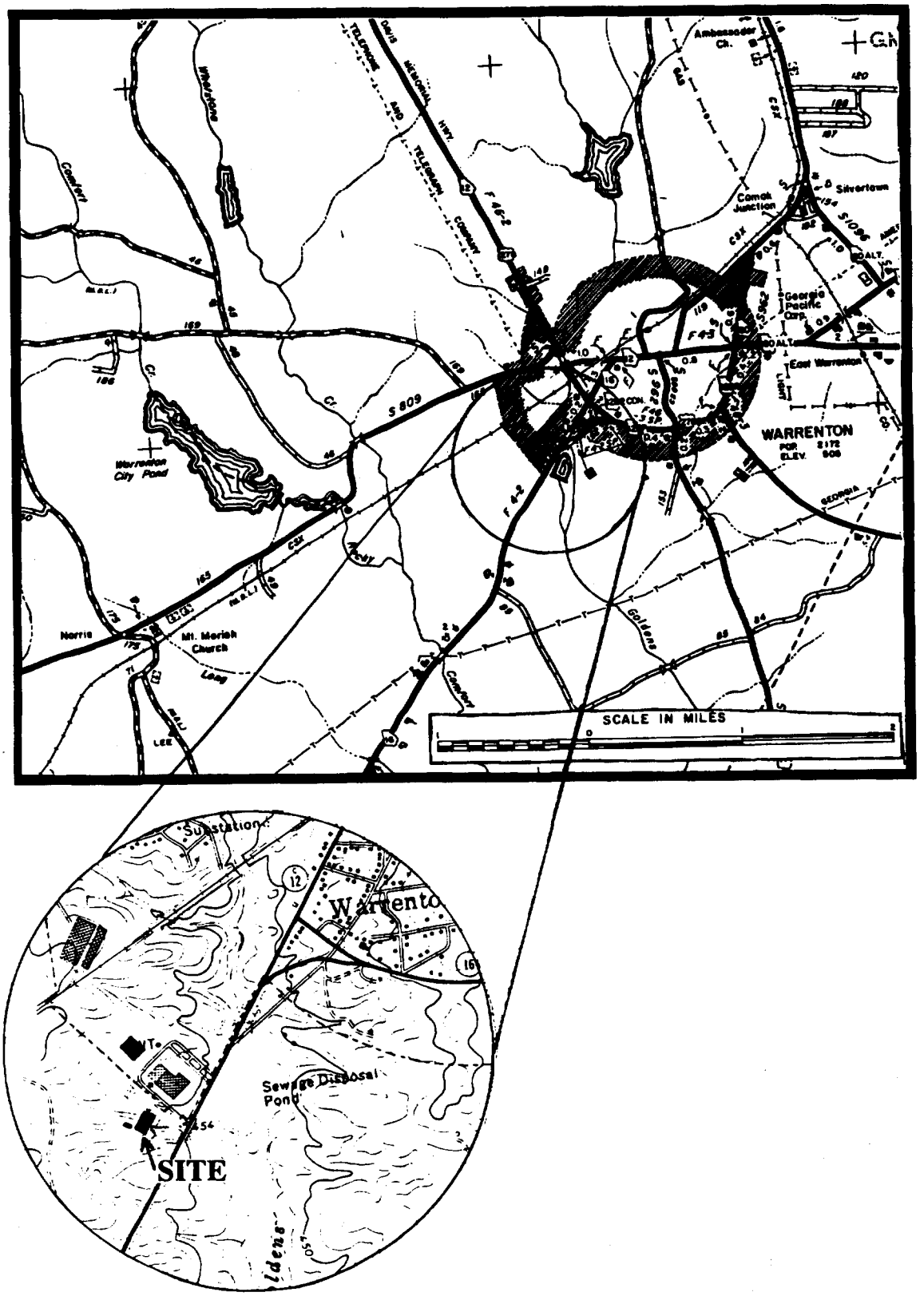
Warrenton Rubber Company Site, located at 101 Flower Street in Warrenton, Georgia, occupies approximately 11.11 acres and is located roughly ½ mile southeast of the city of Warrenton (Fig. 1). The geographical coordinates are 33° 23' 44" latitude and 82° 40' 40" longitude as detailed on the United States Geological Survey (U.S.G.S.) 7.5-Minute Series (topographic) map (Ref. 1 & 2).

Warren County is described as having warm humid summers and mild winters. The average temperature for the summer is 79°F with an extreme high of 110°F. The average temperature for the winter is 47°F with an extreme low 3°F. The mean annual precipitation is approximately 46 inches per year (Ref. 3).

2.2 SITE DESCRIPTION

The property consists of two buildings approximately 200 X 300 ft. and 60 X 120 ft. The typical construction for the two buildings is structural steel and masonry. The two buildings were used for storage/production activities. A dirt/gravel parking lot is located immediately southeast of the main structure. Rectangular in shape, the lot is set off Highway 16 and an access road serves to connect the property to the highway (Figure 2) (Ref. 4).

FIGURE 1. SITE LOCATION MAP - WARRENTON RUBBER SITE



The area behind the main structure consists of construction debris (dirt, cement blocks, wood, etc.). One of the underground storage tanks (UST) has been removed and is stored at the construction debris area (Ref. 4). Previous records indicate a UST still remains buried behind the main structure (Ref. 5).

The area associated with the secondary structure is stained with carbon black, a material used for the production of inner tubes and related products (Ref. 4).

The property is bordered on the south by trees and a cow pasture approximately 90 ft. from the facility boundary. There is a small dried-up pond on the southeastern portion of the site. Healthtex, a shipping and receiving facility borders the north side of the site. A dairy and pecan farm is located to the east and southeast of the property (Ref. 4).

Topography at the site is sloping to the southeast. The surface water drainage flows from the site into a small stream. The stream flows across Highway 16 towards the City of Warrenton South Oxidation Pond, but does not intersect the pond (Ref. 4).

Site soils and terrain are consistent with those expected in this area. The surficial soils consist of fine sand to clay sized soil (Ref. 6).

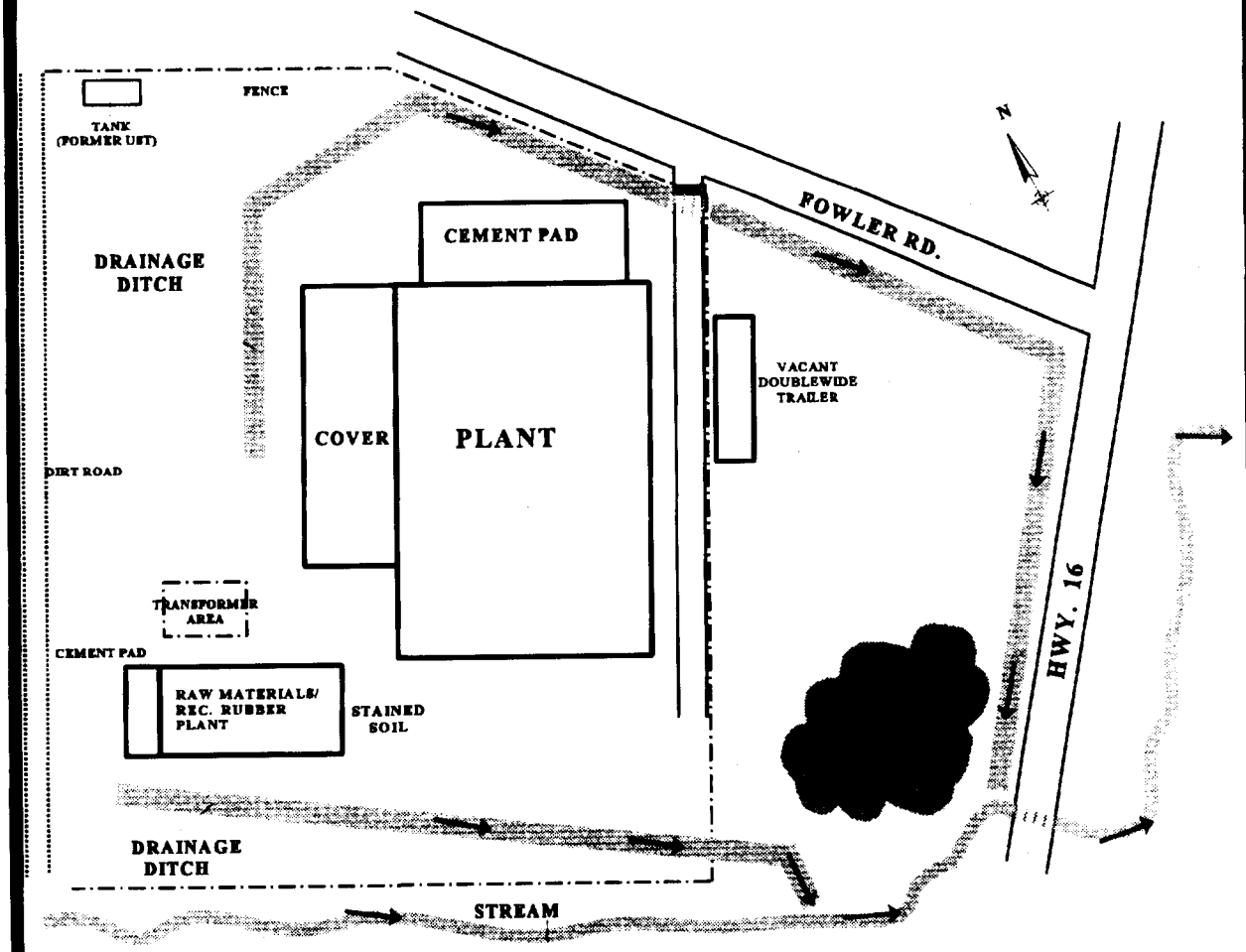
2.3 OPERATIONAL HISTORY AND WASTE CHARACTERISTICS

Prior to development as a commercial property around 1974, the property appears to have been either undeveloped or used for agriculture purposes. Previous to Warrenton Rubber Company which closed in 1989, the facility was used for Retreaders Tire Supply Company (Ref. 7). E.H. Mann, doing business as Warrenton Rubber Company, filed for bankruptcy (US Bankruptcy Court for the Southern District of Georgia, Augusta Division, Chapter 7, Case No. 89-10699-JDS) (Ref 8). A. Stephen Wallace, the Trustee in the bankruptcy for the Debtor, sold the property to D&H Rail Services in July of 1995, and is currently operating as Lee & D Contractors, Inc. Transfer Station, a solid waste transfer station. The transfer station is operated by David Parham (Ref. 4).

The production facility for inner tubes and related products was constructed and used by Warrenton Rubber Company. Products used at the site that would constitute hazardous waste when disposed, consist of any rubber solvent, toluene, and Surret Fluid 4K (heavy asphaltic based lubricant for wire ropes diluted with 1,1,1-trichloroethane) (Ref. 5). All potentially hazardous waste materials have been removed from the site. The drum/product removal invoices indicate that 19 drums and an additional 1,950 gallons of bulked waste was disposed of by Alternative Energy Resources, Inc. between December 1993 and May 1994 (Ref. 9).

FIGURE 2. SITE SKETCH - WARRENTON RUBBER SITE
(CURRENTLY LEE & D CONTRACTORS, INC. TRANSFER STATION)

NOT TO SCALE



A Phase II Soil Assessment was performed in 1990 in which 24 soil samples were obtained and analyzed. During the Environmental Assessment of October 1993, four soil samples and two groundwater samples were obtained and analyzed. The results of this sampling event indicated ranges of 25 to 130 parts per million (ppm) of Total Petroleum Hydrocarbon (TPH) in the soil and Below Detection Limit to 0.5 parts per billion (ppb) of 1,1-Dichloroethane in the groundwater (Ref. 10). The U.S. Environmental Protection Agency Emergency Response and Removal Branch indicated that from their review of the available information presented, the site does not meet the criteria for removal eligibility (Ref. 9).

3.0 GROUNDWATER PATHWAY

3.1 HYDROGEOLOGIC SETTING

The Warrenton Rubber site is located just north of the Fall Line and is underlain by undifferentiated granite gneiss (Ref. 11). Warrenton and its environs lie in the Washington Slope District of the Georgia Piedmont. The Washington Slope District is characterized by gently rolling terrain of broad, shallow valleys separated by broad, rounded divides. Relief varies from approximately 50-100 feet. Elevations near the Fall Line, the southern boundary of the district average approximately 500 feet above mean sea level (Ref. 12).

The Warrenton Rubber site is underlain by a typical Piedmont aquifer, an unconfined aquifer composed of fractured crystalline bedrock and the overlying mantle of residuum derived from weathering of the bedrock. Groundwater in such aquifers is generally encountered between 10 and approximately 600 feet of depth (Ref. 13). The vicinity of the Site has not been identified as a "most significant groundwater recharge area" (Ref. 14).

3.2 GROUNDWATER TARGETS

Warrenton City Water Department reports that Watershed Project No. 46 supplies the City of Warrenton and some of the county. This supply source consists of a 125-acre pond located approximately one mile to the west of the study property. Three deep wells, two at 275 ft. and one at 125 ft., are operated by a dairy farm approximately ¼ mile to the west (Ref. 4 & 15).

The population served by private drinking water wells within ¼, ½, 1, 2, 3, and 4 mile(s) from the site is approximately 2, 6, 21, 86, 162, and 248, respectively. The number of private wells and the respective population within 4 miles of the site are listed in Table 1 (Ref. 16).

TABLE 1: Private wells within 4-mile radius of Warrenton Rubber Company Site

RADIUS (MILE)	DRILLED WELLS	DUG WELLS	OTHER WATER SOURCES	POP. ON PRIVATE WELLS
0 - 1/4	0.61	0.23	0.04	1.98
1/4 - 1/2	1.80	0.65	0.11	6.13
1/2 - 1	6.19	1.79	0.34	21.13
1 - 2	23.90	9.55	1.60	86.05
2 - 3	44.22	20.17	2.83	162.19
3 - 4	67.84	28.74	3.26	247.98
TOTAL	**144.57**	**61.13**	**8.19**	**525.46**

3.3 GROUNDWATER CONCLUSIONS

No primary targets were identified for the groundwater pathway. According to an environmental assessment performed at the site entitled "Report of Additional Environmental Assessment," a release of hazardous substance from the Warrenton Rubber Site is suspected due to spills and mishandling of hazardous products at the site. However, groundwater sampling analyses indicated all constituents were below the detection limit, except for 1,1-Dichloroethane (1,1-DCA), which was found at a level equal to the detection limit [0.5 parts per billion (ppb)]. This trace concentration of 1,1-DCA is not indicative of significant volatile organic compound (VOC) occurrence, and does not warrant additional assessment based on known site activities (Ref. 10). The groundwater pathway is not of concern at this site.

4.0 SURFACE WATER PATHWAY

4.1 HYDROLOGIC SETTING

Overland drainage from the site flows into two drainage ditches located at the northeast and southwest of the site. Both of the drainage ditches flow into an unnamed stream, with an average flow rate of less than 10 cubic feet per minute (cfm). The stream flows across Highway 16 towards the City of Warrenton South Oxidation Pond, but does not intersect the pond (Ref. 4). The stream flows into Goldens Creek, which seems to be generated from the City of Warrenton Sewage Disposal Pond. This creek flows south from the site and eventually becomes Rocky Comfort Creek, approximately 15 miles down stream. Several ponds contribute to the creek within the 15-mile target distance (Ref. 2).

4.2 SURFACE WATER TARGETS

No primary targets were identified. There are no drinking water intakes within the target distance limit. The range of Federally designated threatened and endangered species is known to include Warren County. Warren County provides habitat for the Endangered *Picoides borealis* (Red-Cockaded Woodpecker) (Ref. 17). No endangered, threatened or unusual species were observed during the site reconnaissance (Ref. 4). The targets for surface water include all fish, amphibians, and amphibious reptiles within the 15-mile distance.

4.3 SURFACE WATER CONCLUSIONS

There are no indications of a release of contamination to the surface water. No signs of stressed vegetation or discolored surface water were noted during the site reconnaissance (Ref 4). Previous samples taken during a 1989 environmental assessment concluded no contamination was evident (Ref. 15). No primary targets for the surface water pathway are identified, and there is no evidence of a release to surface water. The surface water pathway is not of concern at this site.

5.0 SOIL EXPOSURE PATHWAY

5.1 PHYSICAL CONDITIONS

Access to the site is somewhat restricted. A fence borders the site but is damaged in one area. Natural barriers and heavy brush restrict access at the southwest portion of the site (Ref. 4).

The Warrenton Rubber site is situated on soils of the Appling-Cecil-Wedowee soil association. These soils are described as very gently sloping and gently sloping, well-drained soils that have a sandy or loamy surface layer and a clayey subsoil. Specifically, the site is underlain by Appling Sandy Loam. This soil type is described as a deep, well-drained, very gently sloping soil found on smooth, convex ridgetops of the Piedmont Upland. The surface layer of this soil type ranges from 4 to 9 inches in depth and consists of a brown, sandy loam. The subsoil averages 48 inches deep, and consists of yellowish-red sandy clay loam to brownish clay loam. Appling Sandy Loam soils are acid, moderately permeable, and possess low natural fertility (Ref. 6).

Soil analyses indicate that TPH was detected in four areas at the site. The results from the sampling event indicated ranges from 25 to 130 ppm of TPH (Ref. 10). These results are consistent with known plant activities, which included storage of processing oil. The U.S. Environmental Protection Agency - Emergency Removal and Response Branch's (EPA ERRB) review of the analytical data indicated that the site does not meet the criteria for removal eligibility (Ref. 9).

5.2 SOIL EXPOSURE TARGETS

No resident population was identified. Currently the site is operated by David Parham of Lee & D Transfer Station, which employs two (2) on-site workers which handle the waste and a driver. A total of four (4) people have access to the site (Ref. 4).

The Endangered *Picoides borealis* (Red-Cockaded Woodpecker) are known to inhabit various areas of Warren County (Ref. 17).

5.3 SOIL EXPOSURE CONCLUSIONS

No resident population was identified at the site. No adverse health problems related to the site were reported (Ref. 18). No terrestrial sensitive environments were identified on the site. Although soil contamination is evident at the site, the levels of contamination did not meet the criteria for removal eligibility by the U.S. EPA ERRB (Ref. 9 & 10). The soil exposure pathway is not of concern at this site.

6.0 AIR EXPOSURE PATHWAY

6.1 PHYSICAL CONDITIONS

As described in paragraph 5.5, access to the site is somewhat restricted. A fence borders the site but is damaged in one area. Natural barriers and heavy brush restrict access at the southwest location of the site. The population within a 4-mile radius of the site is 2,724.

6.2 AIR EXPOSURE TARGETS

During the site reconnaissance, no release to the air was evident (Ref. 4). Because a release to the air is not suspected, there are no primary targets. The people not suspected to be exposed to a release have been evaluated within a 4-mile radius of the site. There is no documentation of adverse health effects pertaining to the release of constituents to the air (Ref. 18).

6.3 AIR EXPOSURE CONCLUSIONS

No release to the air is indicated at this site. No targets were identified. The air pathway is not of concern at this site.

7.0 SUMMARY AND CONCLUSIONS

A release of hazardous substance from the Warrenton Rubber Site is suspected due to spills and mishandling of hazardous products at the site. However, the groundwater sampling analyses indicated all constituents were below the detection limit, except for (1,1-DCA) found at the detection limit. This trace concentration of 1,1-DCA is not indicative of significant VOC occurrence, and does not warrant additional assessment based on known site activities (Ref. 10). No primary groundwater targets were identified.

There are no indications of a release to surface water. Samples taken during a 1989 environmental assessment indicated that no contamination was present (Ref. 15). No primary targets were identified.

The site does not have a resident population. Although soil contamination is evident at the site, the levels of contamination did not meet the criteria for removal eligibility by the U.S. EPA ERRB (Ref. 9 & 10). No adverse health problems related to the site were reported (Ref. 18).

During the site reconnaissance, no release to the air was observed (Ref. 4). There is no documentation of adverse health effects pertaining to any release of constituents to the air (Ref. 18). No primary targets were identified.

None of the potential exposure pathways are of concern at the Warrenton Rubber Company Site. The site is not recommended for further action at this time.

REFERENCES

1. Ganis, G.R., 1979, Topo-Aid: Stonetree, Washaw, North Carolina, 1 pl.

2. U.S. Geological Survey 7.5-Minute Series Topographic Map: Warrenton Quadrangle, Georgia-Warren County., 1972 (photo revised 1987).

3. Carter, R.F. and H.R. Stiles, 1983, Average Annual Rainfall and Runoff in Georgia, 1941-1970: Georgia Geologic Survey Hydrologic Atlas 9, 1 pl.

4. Heater, Danny, Georgia EPD Field Notes for Warrenton Rubber Company Site. Documentation of Site Reconnaissance, February 8, 1996, 2 p.

5. Bovard, Brian, Memorandum to James Frenzel RE: E.H. Mann, Inc., D/B/A Warrenton Rubber Company; Plant Site Visit (the "Site"), May 26, 1993, 4 p.

6. Soil Survey of Columbia, McDuffie and Warren Counties, Georgia, U.S. Department of Agriculture, Soil Conservation Service, April, 1981.

7. Sherman & Hemstreet, "Phase I Environmental Site Assessment - Warrenton Rubber Company," April 30, 1992, 13 p.

8. Bovard, Brian E., Correspondence to Hazardous Waste Management Branch, Georgia Environmental Protection Division, Re: E.H. Mann, Inc. d/b/a Warrenton Rubber Company, Debtor Bankruptcy Chapter 7 Case No. 89-10699-JDS Warrenton, Georgia Plant Site, EPA Form 8700-12, May 26, 1993, 3 p.

9. Lair, Myron D., US EPA, Correspondence to Jennifer Kaduck, Chief, Hazardous Waste Management Branch, Georgia Environmental Protection Division, RE: Warrenton Rubber Company Site, Warrenton, Georgia, No Date on Letter (some time after 2-23-95), 2 p.

10. Atlanta Testing and Engineering, "Report of Additional Environmental Assessment Former Warrenton Rubber Company Site," October 4, 1993, 4 p.

11. Georgia Geologic Survey, 1976, Geologic Map of Georgia, Georgia Geologic Survey Statewide Map SM-3, 1:500,000.

12. Clark, W.Z. and Zisa, A.C., Physiographic Map of Georgia, Georgia Department of Natural Resources, 1976.

13. Brackett, D.A., Steele, W.M., Schmitt, T.J., Atkins, R.L., Kellam, M.F., and Lineback, J.A., 1991, Hydrogeologic Data from Selected Sites in the Piedmont and Blue Ridge Provinces, Georgia: Georgia Geologic Survey Information Circular 86, 160 p.

14. Georgia Geologic Survey, 1989, Most Significant Groundwater Recharge Areas, Hydrologic Atlas 18, scale 1:500,000.

15. OHM Remediation Services Corporation, Correspondence to Derrick Peterson of Kearney National, Inc., RE: Phase II Soils Assessment, Warrenton Rubber Plant, Warrenton, Georgia, May 23, 1990, 6 p.

16. Centracts Data, February 12, 1996, Warrenton Rubber Company Site, Warrenton, Georgia: Frost Associates, 8 p.

17. Ettman, David, et. al., 1991, Georgia's Protected Wildlife: Georgia Dept. of Natural Resources, 5 p.

18. Julia Veasey, Facility Administrator for Warren County Health Department, Warrenton Georgia, telecommunication, February 19, 1996.

19. Brian E. Bovard, Correspondence to James C. Frenzel, RE: E.H. Mann site: soil contamination areas (from OHM Phase II study) and Probable Product sources, July 20, 1993, 3 p.

20. Wiggins, Freddy, City of Warrenton Water Department Represenative, Warrenton, Georgia, on-site communication, February 8, 1996.

21. National Flood Insurance Program, Flood Insurance Map, July 23, 1982, City of Warrenton, Georgia, Community-Panel Number 130187 0005 A, 1 p.

APPENDIX A

US GEOLOGICAL SURVEY 7.5-MINUTE SERIES
TOPOGRAPHICAL MAP

OVERSIZED

DOCUMENT

APPENDIX B

PHOTOGRAPHS: WARRENTON RUBBER COMPANY SITE
FEBRUARY 8, 1996

UNSCANNABLE

MEDIA

(PHOTOGRAPHS)

APPENDIX C

WARRENTON RUBBER COMPANY SITE
RECONNAISSANCE FIELD NOTES
FEBRUARY 8, 1996

Feb 8, 1996 - Daniel Heater
Site Recon for Warrenton
Rubber Co., Warrenton GA

Interview w/ Steven Wallace -
Steven Wallace was the Trustee in the bankruptcy for the Debtor, sold the property to D+H Rail Services in July of 1985 and is currently operating as Lee + D Transfer Station - a solid waste transfer Station.

The Property consist of 2 buildings 200x300 ft + 60x120 ft
- Currently operated by David Parham
- stated the site is 11.11 acres
- buildings are of steel and Masonry and are used for storage + production activity - SE is dirt + gravel Parking of Main Structure
- Access Rd Connects the property to the Hwy.

①

GA-EPD
2nd day Structure - Soil is Stained w/ Carbon black - stated David Parham

- Trees + Cow Pasture boarder the South Portion of Property

- Dried up pond to the South East Portion -

- Topography sloping to the South east - SW drainage flows from site into a small stream under 16 towards Oxidation pond. - doesn't Intersect.

- Dairy farm located SE of site Reported 3 deep wells used for Drinking + Dairy -
  2 - at 275 ft
  1 at 125 ft
  } ≈ 1/4 mile from site.

②

Overland Drainage from the site flows ~~into~~ the two drainage Ditches northwest + southwest of site to an unknown stream. Across Hwy 16 towards Oxidation Rd.

- Site - 2 employees + and Driver -

APPENDIX D

SELECTED REFERENCES
WARRENTON RUBBER COMPANY SITE

FROST ASSOCIATES

Ref. 16

P.O. Box 495, Essex, Connecticut 06426
(860) 767-7644 FAX (860) 767-1971

February 12, 1996

To: Environmental Protection Division
Hazardous Waste Management Branch
205 Butler St., Floyd Towers East, Suite 1154
Atlanta, GA 30334

Attn: James Ussery

Fr: Frost Associates
P.O. Box 495
Essex, Conn 06426

Tel: (203) 767-1254
Fax: (203) 767-7069

Sub: Warrenton Rubber Company Site
Warrenton, GA

Site Longitude: 82-40-40 82.677780
Site Latitude : 33-23-45 33.395828

The CENTRACTS report below identifies the population, households, and private water wells of each Block Group that lies within, or partially within, the 4, 3, 2, 1, .5, ıd .25, mile "rings" of the latitude and longitude coordinates above. CENTRACTS may have up to ten radii of any length. 1000 block groups, and 15000 block group sides.

CENTRACTS uses the 1990 Block Group population and Block Group house count data found in the Census Bureau's 1990 STF-1A files. The sources of water supply data are from the Bureau's 1990 STF-3A files. The boundary line coordinates of the Block Groups were extracted from the Census Bureau's 1990 TIGER/Line Files.

CENTRACTS reports are created with programs written by Frost Associates, P.O. Box 495, Essex, Conn. The code was written using Microsoft's Quick-Basic Ver. 4.5.

Latitude and Longitude coordinates identifying a site are entered in degrees and decimal degrees. One or more county files holding Block Group boundary lines are selected for use by CENTRACTS by determining whether the site coordinates fall within the minimum and maximum Lat\Lon coordinates of each county in the state.

Each Block Group line segment has Lat\Lon coordinates representing the "From" and "To" ends of that line. All coordinates from the selected county files are read and converted from degrees, decimal degrees to X\Y miles from the site location. Each line segment is then examined whether it lies within or partially within the maximum ring from the site.

The unique Block Group ID numbers of each line segment that lie within the maximum ring are retained. All Block Group boundary lines matching the Block Group numbers are then extracted from the respective county files to obtain all sides of the included Block Groups. Boundary records are then sorted in adjacent side order to determine the shape and area of each Block Group polygon.

method to solve for the area of a polygon is to take one-half the sum of the products obtained by multiplying each X-coordinate by the difference between the adjacent Y-coordinates. For a polygon with coordinates at adjacent angles A, B, C, D, and E. The formula can be expressed:

Area = 1/2{Xa(Ye-Yb)+ Xb(Ya-Yb)+ Xc(Yb-Yd)+ Xd(Yc-Ye)+ Xe(Yd-Ya)}

For each ring, the selected Block Groups will be inside, outside, or intersected by the ring. When a polygon is intersected, the partial Block Group area within that ring is calculated using the method described below.

When a ring intersects a Block Group, the intersect points are solved and plotted at the points where the ring enters and exits the shape. The chord line, a line within the circle connecting the intersect points is determined. This chord line is used to calculate the segment area, the half moon shape between the chord line and the ring, and the sub-polygon created by the chord line and the Block Group boundaries that lie outside the ring.

The segment area is subtracted from the sub-polygon area to determine the area of the sub-polygon outside the ring. The area outside the ring is then subtracted from the area of the entire polygon to arrive at the inside area. This inside area is then divided by the tract's total area to determine the percentage of area within the ring. This process is repeated for each block group that is intersected by one of the rings. The total area, partial area, and percentage of partial area of those block groups within, or partially within a ring, are held in memory for the report.

On occasion, the algorithm described above is unable to determine the area of the partial area. Within the report program is a "Paint" routine which allows an enclosed shape to be highlighted. Another routine calculates the percentage of highlighted screen pixels to the pixels within the polygon. A manual entry is allowed. Both the "paint" method and manual entry method over ride the calculated method.

CENTRACTS lists, starting on page 4, all Block Groups in State, County, Census Tract, and Block Group ID order that lie within, or partially within, the maximum ring. Each Block Group is identified by a City or Town name and by the Block Group's State, County, Tract and Block Group ID number. Following is the Block Group's 1990 population and house count extracted from the Census Bureau's 1990 STF-1A files.

The next four columns display water source data from the 1990 STF-3A files. The first column is "Units with Public system or private company source of water", followed by "Units with individual well, Drilled, source of water"; "Units with individual well, Dug, source of water" and "Units with Other source of water".

For each ring, CENTRACTS then shows the Block Groups that are within that ring, the Block Group's total area in square miles, the partial area of the Block Group within that ring, and the partial percentage within the ring. The areas of the included Block Group and the partial areas are then totaled.

The last section tallies the demographic data within each ring. The percentage of area for each Block Group is multiplied times the census data for that Block Group and totaled for all Block Group's within the ring. Ring totals are then determined by subtracting the three mile data from the four mile, the two mile from the three mile, one from the two, etc... Population on private wells is calculated using the formula: ((Drilled + Dug Wells) / Households) * Population

Warrenton Rubber Company Site
Warrenton, GA

No.	City	Block Group ID	Blk Grp People	House Holds	Public Water	Drilled Wells	Dug Wells	Other
1	Camak	13301 9701 1	1063	425	169	143	76	8
2	Norwood	13301 9702 1	773	338	84	182	22	8
3	Norris	13301 9703 1	1105	427	0	270	161	10
4	Warrenton	13301 9704 1	980	348	364	19	0	0
5	Warrenton	13301 9704 2	1216	502	500	3	6	2
6	Warrenton	13301 9704 3	941	403	89	226	86	15
	Totals:		6078	2443	1206	843	351	43

Warrenton Rubber Company Site
Warrenton, GA

City	Census Tract ID		Tract People	House Count	Public Water	Drilled Wells	Dug Wells	Other Sources
Camak	13301 9701	1	1063	425	169	143	76	8
	Sub Totals:		1063	425	169	143	76	8
Norris	13301 9703	1	1105	427	0	270	161	10
	Sub Totals:		1105	427	0	270	161	10
Norwood	13301 9702	1	773	338	84	182	22	8
	Sub Totals:		773	338	84	182	22	8
Warrenton	13301 9704	1	980	348	364	19	0	0
Warrenton	13301 9704	2	1216	502	500	3	6	2
Warrenton	13301 9704	3	941	403	89	226	86	15
	Sub Totals:		3137	1253	953	248	92	17

Warrenton Rubber Company Site
Warrenton, GA

For Radius of 4 Mi., Circle Area = 50.265482

No.	City	Block Group ID	Total Area	Partial Area	% Within Radius
1	Camak	13301 97011	57.145969	3.798229	6.65
2	Norwood	13301 97021	63.896740	5.542462	8.67
3	Norris	13301 97031	72.339417	13.737732	18.99
4	Warrenton	13301 97041	9.081198	8.972008	98.80
5	Warrenton	13301 97042	3.438180	3.438180	100.00
6	Warrenton	13301 97043	72.237679	14.776874	20.46
	Totals:		278.139191	50.265484	

For Radius of 3 Mi., Circle Area = 28.274334

No.	City	Block Group ID	Total Area	Partial Area	% Within Radius
1	Camak	13301 97011	57.145969	0.896034	1.57
2	Norwood	13301 97021	63.896740	1.987033	3.11
3	Norris	13301 97031	72.339417	6.652163	9.20
4	Warrenton	13301 97041	9.081198	7.058617	77.73
5	Warrenton	13301 97042	3.438180	3.243108	94.33
6	Warrenton	13301 97043	72.237679	8.437380	11.68
	Totals:		278.139191	28.274334	

For Radius of 2 Mi., Circle Area = 12.566371

No.	City	Block Group ID	Total Area	Partial Area	% Within Radius
2	Norwood	13301 97021	63.896740	0.030044	0.05
3	Norris	13301 97031	72.339417	1.729533	2.39
4	Warrenton	13301 97041	9.081198	4.453420	49.04
5	Warrenton	13301 97042	3.438180	1.431780	41.64
6	Warrenton	13301 97043	72.237679	4.921592	6.81
	Totals:		220.993225	12.566370	

For Radius of 1 Mi., Circle Area = 3.141593

No.	City	Block Group ID	Total Area	Partial Area	% Within Radius
3	Norris	13301 97031	72.339417	0.001510	0.00
4	Warrenton	13301 97041	9.081198	0.951328	10.48
5	Warrenton	13301 97042	3.438180	0.106127	3.09
6	Warrenton	13301 97043	72.237679	2.082628	2.88
	Totals:		157.096466	3.141593	

Warrenton Rubber Company Site
Warrenton, GA

For Radius of .5 Mi., Circle Area = 0.785398

No.	City	Block Group ID	Total Area	Partial Area	% Within Radius
4	Warrenton	13301 97041	9.081198	0.044513	0.49
6	Warrenton	13301 97043	72.237679	0.740885	1.03
	Totals:		81.318878	0.785398	

For Radius of .25 Mi., Circle Area = 0.196350

No.	City	Block Group ID	Total Area	Partial Area	% Within Radius
6	Warrenton	13301 97043	72.237679	0.196350	0.27
	Totals:		72.237679	0.196350	

Warrenton Rubber Company Site
Warrenton, GA

========== Site Data ==========

Population:	2724.26
Households:	1066.91
Drilled Wells:	144.57
Dug Wells:	61.13
Other Water Sources:	8.19

========== Partial (RING) data ==========

---- Within Ring: 4 Mile(s) and 3 Mile(s) ----

Population:	563.29
Households:	219.39
Drilled Wells:	67.84
Dug Wells:	28.74
Other Water Sources:	3.26

** Population On Private Wells: 247.98

---- Within Ring: 3 Mile(s) and 2 Mile(s) ----

Population:	1083.10
Households:	429.99
Drilled Wells:	44.22
Dug Wells:	20.17
Other Water Sources:	2.83

** Population On Private Wells: 162.19

---- Within Ring: 2 Mile(s) and 1 Mile(s) ----

Population:	910.52
Households:	353.96
Drilled Wells:	23.90
Dug Wells:	9.55
Other Water Sources:	1.60

** Population On Private Wells: 86.05

---- Within Ring: 1 Mile(s) and .5 Mile(s) ----

Population:	152.89
Households:	57.74
Drilled Wells:	6.19
Dug Wells:	1.79
Other Water Sources:	0.34

** Population On Private Wells: 21.13

Warrenton Rubber Company Site
Warrenton, GA

---- Within Ring: .5 Mile(s) and .25 Mile(s) ----

Population:	11.90
Households:	4.74
Drilled Wells:	1.80
Dug Wells:	0.65
Other Water Sources:	0.11

** Population On Private Wells: 6.13

---- Within Ring: .25 Mile(s) and 0 Mile(s) ----

Population:	2.56
Households:	1.10
Drilled Wells:	0.61
Dug Wells:	0.23
Other Water Sources:	0.04

** Population On Private Wells: 1.98

** Total Population On Private Wells: 525.46

Ref. 5

6

Brian E. Bovard
3058 Paces Station Ridge
Atlanta, Georgia 30339

MEMORANDUM

TO: James C. Frenzel

FROM: Brian E. Bovard BEBovard

DATE: July 20, 1993

RE: E.H. Mann site: soil contamination areas (from OHM Phase II study) and probable product sources

The OHM study identified four (4) areas of soil contamination (see attached chart from the report).

Area 1: UST area

We know that at least one of the two UST's was used to store "Rubber Solvent," but it's not certain that the smaller tank held the same. If not, the second UST probably held heating oil or a process oil.

Product removed from the UST's was manually pumped into 55-gallon drums which were then taken to the mixing plant building. Any surface contamination in this area was likely the result of sloppy handling in loading or unloading product from the UST's.

Area 2: AST's/Process Oil

This is the largest area of surface contamination, which we know resulted from the approximate 2,000-2,500 gallon "over-fill" spill of the "100/100 Process Oil" back in 1985.

Area 3: Adjacent to covered work area behind main building

This is the general area where the "oil house," the propane and gasoline AST's, and the vast majority of product drums were located.

The OHM soil samples showed no reportable levels of purgeable aromatics, which would seem to eliminate gasoline, toluene, or naphtha as the likely source. Lubricating oils could be a possible source, but I wouldn't rule out the drums that contained toluene, naphtha, or the mixed "value cement" completely.

I would speculate that sloppy handling of drum materials was the cause of any surface contamination.

Area 4: AST/Truck location

Supposedly the AST and truck (tanker) kept in this area were used to store #2 heating oil that was burned in the boiler inside the main plant building.

Again, I would speculate that any surface contamination in this area was the result of sloppy handling or leaking nozzles from the AST and/or the tanker.

NOTE: The OHM soil samples were tested for purgeable aromatics/purgeable hydrocarbons (EPA Test Method 8010/8020), and with but one exception, all compounds tested BDL (Below Detection Limit). That exception was a 0.564 ppm level of tetrachloroethylene in one sample, but the toxicity characteristic maximum concentration level is 0.7 ppm.

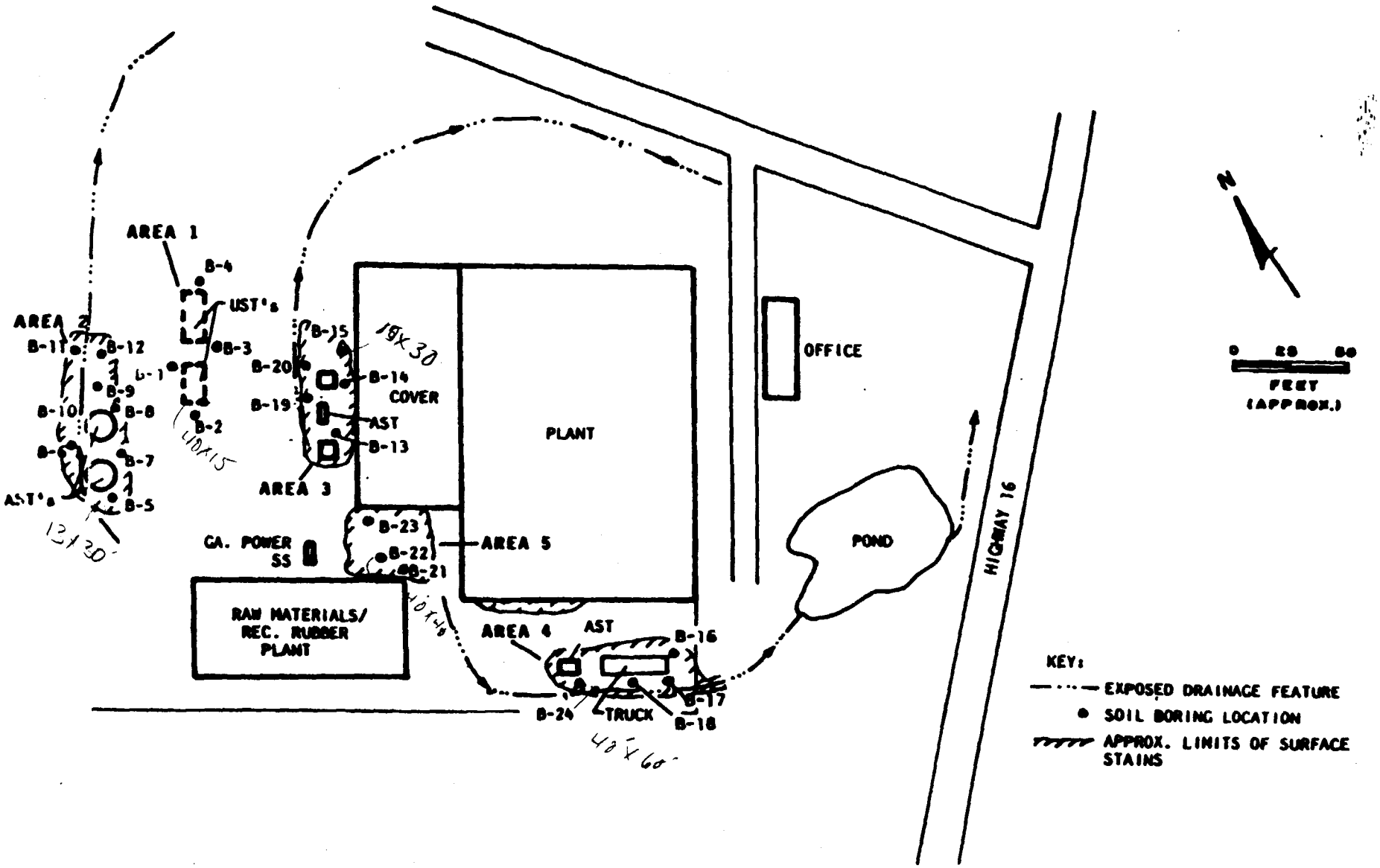
If gasoline, toluene, or naphtha were the sources of surface contamination, you'd expect them to show up in the 8010/8020 tests.

The contamination reported in the OHM study is all TPH related. Removing the 8010/8020 compounds from the list of candidates leaves basically the process oils, lubricating oils, and heating oil as the most likely sources of contamination.

BEB

BEB:dlr

02657\00001\dlr5101



PROJECT: KEARNEY-NATIONAL

FIGURE 1

Ref. 7.

PHASE I
ENVIRONMENTAL SITE ASSESSMENT

Project:

WARRENTON RUBBER COMPANY
WARRENTON, GEORGIA

Prepared For:

SHERMAN & HEMSTREET
123 Eighth Street
Augusta, GA 30901

Realtors

Prepared By:

GSC ENVIRONMENTAL LABORATORIES, INC.

ENVIRONMENTAL TESTING
INSPECTIONS - SURVEYS

GSC ENVIRONMENTAL LABORATORIES

REPORT

THIS REPORT RELATES ONLY TO THE SPECIFIC SAMPLES TESTED AND/OR SPECIFIC INSPECTIONS PERFORMED AND MUST NOT BE REPRODUCED EXCEPT IN FULL AND ONLY WITH THE WRITTEN APPROVAL OF THE LABORATORY

April 30, 1992 Report No: 166-1002-02

Sherman & Hemstreet
123 Eighth Street
Augusta, GA 30901

Attn: Mr. Ralph Kitchens

Subject: PHASE I ENVIRONMENTAL SITE ASSESSMENT
Warrenton Rubber Company
Warrenton, GA

Dear Mr. Kitchens:

According to your instructions, GSC **ENVIRONMENTAL LABORATORIES, INC.** has completed a PHASE I ENVIRONMENTAL SITE ASSESSMENT at the subject project. The following pages of this report contain the results of the Assessment.

GSC ENVIRONMENTAL LABORATORIES, INC.

Joe W. Troutman
Vice-President

JWT/mgt

1824 A-3 WYLDS ROAD — AUGUSTA, GA 30909 — (404) 737-0185

TABLE OF CONTENTS

1.0 INTRODUCTION

2.0 SCOPE OF SERVICES

3.0 SITE OBSERVATIONS

4.0 RECORDS SEARCH

5.0 ASSESSMENT RESULTS

- 5.1 GEOLOGIC CHARACTERISTICS
- 5.2 HAZARDOUS MATERIALS HANDLING/STORAGE
- 5.3 UNDERGROUND STORAGE TANKS
- 5.4 ABOVE GROUND STORAGE TANKS
- 5.5 SOIL TESTING
- 5.6 SUSPECT ASBESTOS CONTAINING MATERIAL IDENTIFICATION

6.0 SUMMARY

TABLE I

TABLE II

ATTACHMENT I PLAT OF PROPERTY (REPRINT)

ATTACHMENT II DEBRIS ANALYSIS REPORT

ATTACHMENT III PHOTOGRAPHS

1.0 INTRODUCTION

1.1 According to instructions received from the client, GSC Environmental Laboratories, Inc. has conducted a Phase I Environmental Site Assessment of the property located on Georgia Highway 16 in Warrenton, Georgia. Attachment I to this report shows a reprint of the plat.

1.2 The Assessment was initiated at the request of Mr. Ralph Kitchens.

1.3 This Assessment has been conducted utilizing an established protocol in conjunction with data collected for this site along with our knowledge of similar conditions. To the best of our knowledge and belief, the data contained herein is true and correct as represented. However, this should not be considered as an exhaustive undertaking where all possible pollutants or environmental hazards are identified nor should any warranty, guarantee, or certification of suitability be assumed.

2.0 SCOPE OF SERVICES

2.1 The Phase I Environmental Site Assessment conducted for this property consisted of the following items:

A. A site visit and visual observations of the area.

B. A records search, including 50 year title chain, other title documents when available, and aerial photographs to determine prior ownership and/or use.

C. A records search of various state and federal agencies' listings of hazardous sites and/or waste generators.

D. A visual observation of the building located on the property for determination of any potential asbestos containing materials.

E. At the request of the client, securing several soil samples to be analyzed for Total Petroleum Hydrocarbons (TPH).

F. Providing a Summary of the Assessment.

2.2 The data in this report represent the entire scope of services for this Assessment. Conclusions drawn or opinions formed by others from this data are their own, and shall in no way obligate GSC Environmental Laboratories, Inc.

3.0 SITE OBSERVATIONS

3.1 The property consists of approximately 11.11 acres with two existing buildings, 2 metal storage sheds and a double-wide mobile office trailer. The largest building was approximately 5% office area and the remainder was used for storage/production activities. The other building was used for storage/production activities. The typical construction for the two buildings is structural steel and masonry.

3.2 Prior to development as a commercial property, which appears to have occurred in the 1972 to 1974 time period, the property appears to have been either undeveloped or used for agricultural purposes. Prior to Warrenton Rubber Company which closed in 1989 the facility was used for Retreaders Tire Supply Company. Currently the property is sitting idle.

3.3 The property is currently not maintained. Vegetation covers the area in the expected portions of the property. In general the vegetation appears healthy with no undue stress, such as that expected from hazardous materials. However, there are several areas where vegetation appears to be stressed or nonexistent.

3.4 Most of the property drains reasonably well. In general the drainage flows toward the Eastern corner of the property. There is a pond on the front of the property where the dam has washed out and there are several other areas where ponding occurs.

3.5 There are several creosote treated timbers at various locations around the parking lot. These could create a future hazard.

3.6 The driveways and parking lots are not paved. No evidence was observed to suggest spills from automobiles or other vehicles had occurred, however we would assume the normal spillage and leaking from automobiles has occurred in these areas.

3.7 One large ground mounted transformer (which belongs to Georgia Power Company) is located on the property. There is evidence of past leaking from this transformer. The large building has at least five transformers inside and the other building has five transformers inside. This may not be an absolute total and no evidence of leaking or past leaking was observed. It should be noted that some transformers contain PCB's and if this is a concern then further investigation should be undertaken.

3.0 **SITE OBSERVATIONS** (continued)

3.8 There are approximately 120 metal drums scattered throughout the property with the concentration of these being located in the two buildings or in close proximity to same. These drums are in various stages from empty to full. No attempt was made to determine the contents of these drums, however a large number of these are probably petroleum products or lubricants. Several of these drums have been leaking and/or are currently leaking and others are overflowing due to rain water.

3.9 Several locations were observed along the Southern side of the large building where lines run out or have run out of the building and terminate. The material coming through the lines appears to have been released onto gravel.

3.10 Two underground storage tanks were located in the field directly behind the largest building.

3.11 Two above ground storage tanks were located in the field directly behind the largest building. Two additional larger above ground storage tanks were located adjacent to the western property boundary. One above ground storage tank was observed in the southeastern corner of the large building. In addition a portion of a vessel (without a top) was located adjacent to the smaller building. Several lines were running to and from this vessel, current leaking was observed and the liquid appeared to be a petroleum product.

3.12 Storage of various dry chemicals was observed at locations throughout the buildings and outside the large building.

3.13 Suspected asbestos containing debris was sampled and analyzed.

3.14 Housekeeping is non existent on the inside and outside of the buildings. Trash, equipment (some with large amounts of lubricants), drums, old batteries (some have been crushed), innertube material, various metal discards and electric motors are scattered throughout the property. This material is exposed to the elements.

3.0 SITE OBSERVATIONS (continued)

3.15 Most adjacent property is currently used for agricultural purposes or is undeveloped. The only exception to this is the property to the Northeast. This property was developed in approximately 1961 as Garland Knitting Mill and is currently Health Tex Incorporated. The Health Tex property has two above ground storage tanks that are visible and it was not determined whether these tanks are currently being used or what was in these tanks in the past. The property directly to the North had a warehouse that has burnt in the recent past. Interview indicated this warehouse had a large number of tires inside. The property off the Eastern corner has a pollution control project which appears to be a waste treatment pond. This pond is downgradient and should not be a problem.

4.0 RECORDS SEARCH

4.1 A records search was conducted to collect data on prior use and to determine if the property is shown on state or federal listings for hazardous material contamination or clean-up sites.

4.2 The search revealed the property was either undeveloped or was utilized for agricultural purposes prior to being commercially developed. Interviews and records indicate the probable date for commercial development most probably occurred from 1972 to 1974. Aerial photos from 1976, 1980 and 1989 were observed to support this position.

4.3 The property was not found on state and/or federal listings for hazardous material clean-up or spillage events. Additionally no property in Warren County is on the EPA National Priorities List.

4.3.1 An adjacent property (Health Tex Inc.) was found on the RCRA Notifiers List.

5.0 ASSESSMENT RESULTS

5.1 GEOLOGIC CHARACTERISTICS - According to the USDA Soil Survey the property is composed primarily of Appling sandy loam with 2 to 10 percent slopes. Permeability is moderate. The clayey subsoil retards absorption of effluent. The Northern side of the property is Altavista sandy loam with 0 to 2 percent slopes. This soil has moderate permeability and commonly has a water table at a depth of 18 inches to 30 inches.

5.2 HAZARDOUS MATERIALS HANDLING/STORAGE - Several hazardous chemicals were currently being stored at the property. Some of these materials were in metal drums, some were in cardboard drums and some were in bags. A determination of which chemicals are on site is out of the scope of this Phase I Assessment, however some of the dry chemicals were noted using labels on containers. Some of the names may be manufacturers trade names or trade names (see TABLE II of this report).

5.3 UNDERGROUND STORAGE TANKS - Two underground storage tanks were found on the property. These tanks are located directly behind the large building and no attempt was made to determine the contents. No other underground storage tanks were observed nor was there any physical evidence observed to suggest there had been at an earlier date.

5.4 ABOVE GROUND STORAGE TANKS - Five above ground storage tanks were observed on the property. Two of these tanks are located directly behind the large building and no attempt was made to determine the contents. Two additional larger above ground storage tanks were located adjacent to the western property boundary and no attempt was made to determine the contents. One above ground storage tank was observed in the southeastern corner of the large building and no attempt was made to determine the contents of this tank however it is possible this tank was used for water storage. In addition a portion of a vessel (without a top) was located adjacent to the smaller building. Several lines were running to and from this vessel, current leaking was observed and the liquid appeared to be a petroleum product. No other above ground storage tanks were found on the property, nor was there any physical evidence observed to suggest there had been at an earlier date.

5.0 **ASSESSMENT RESULTS** (continued)

5.5 SOIL SAMPLES - Nineteen soil samples were taken and analyzed for TPH. These samples were taken in obvious or suspected spill sites. State of Georgia regulations would permit a result of up to 100 ug/G in some situations, however it is our opinion this property would probably be limited to the Method Detection Limit (see TABLE I of this report).

5.6 SUSPECT ASBESTOS CONTAINING MATERIAL IDENTIFICATION - The thermal system insulation (pipe fittings) in the large building, the jacketed boiler (insulation, gaskets and lining), all floor tile, all ceiling tile, the insulation on tire molds, any mastic and any roofing material should be assumed to be asbestos containing material (ACM) unless tested and determined to be non-ACM. Debris in the large building where pipe fitting materials had been damaged was sampled and was determined by analysis to not contain asbestos (see ATTACHMENT II of this report).

6.0 SUMMARY

6.1 We found only the potential hazards listed previously at this site. Also, we noted no evidence in the records review to indicate the presence of hazardous materials not previously mentioned.

6.1.1 No evidence was observed to support a conclusion that additional above or below ground storage tanks ever existed. This assessment does not conclude that no other above or below ground storage tank currently exists on this site, the only conclusion in regards to this is no physical evidence exists to support same.

6.2 Where the thermal system insulation (pipe fittings) in the large building, the jacketed boiler (insulation, gaskets and lining), all floor tile, all ceiling tile, the insulation on tire molds, any mastic and any roofing material should need to be disturbed it should be sampled on an individual basis to determine if the material is ACM. If it is determined to be ACM, it should be dealt with in accordance with the laws and regulations of the State of Georgia.

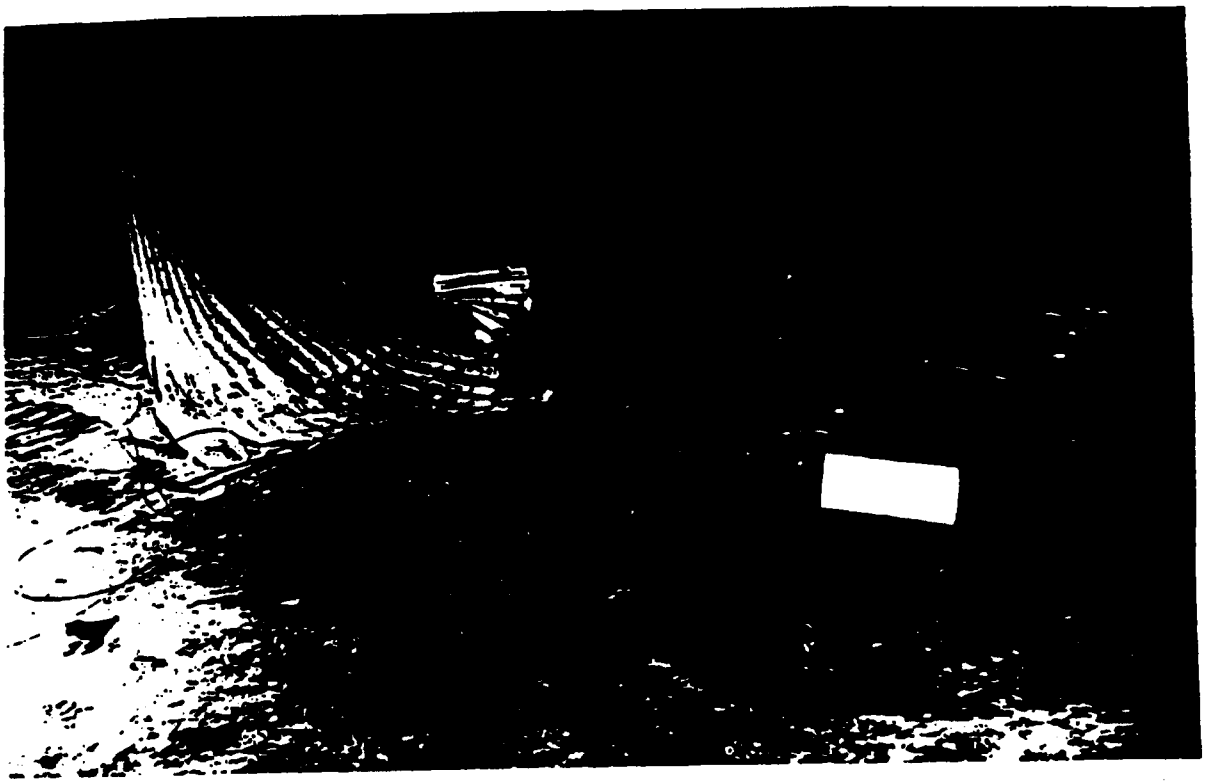
6.3 A housekeeping and maintenance program should be implemented inside and outside the buildings to prevent further contamination.

6.4 The underground storage tanks should either be removed or any product within same should be removed to prevent further contamination.

6.5 The above ground storage tanks should either be removed or any product within same should be removed to prevent further contamination.

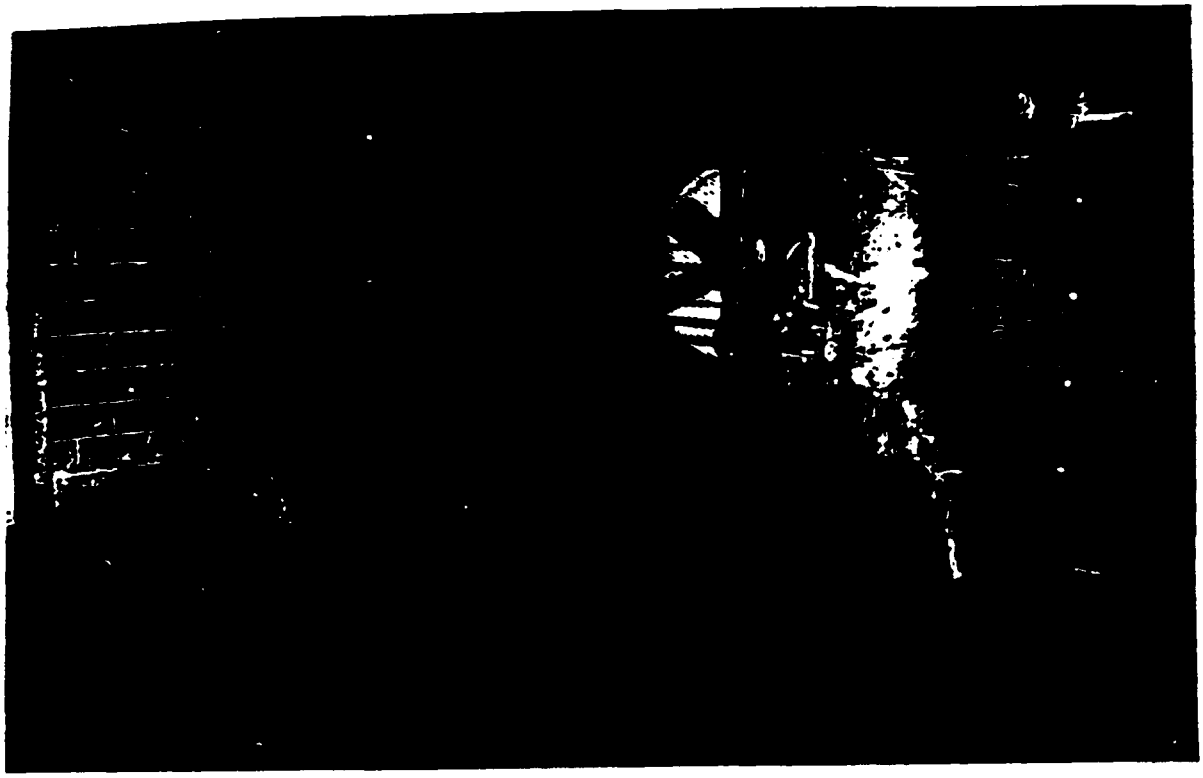
6.6 Based on current observations, we do recommend a Phase II Environmental Assessment.

6.6.1 No specific recommendations are being made for sampling, however if a Phase II Environmental Assessment is desired, on your request we would proceed with the design of a Phase II Assessment for your approval.

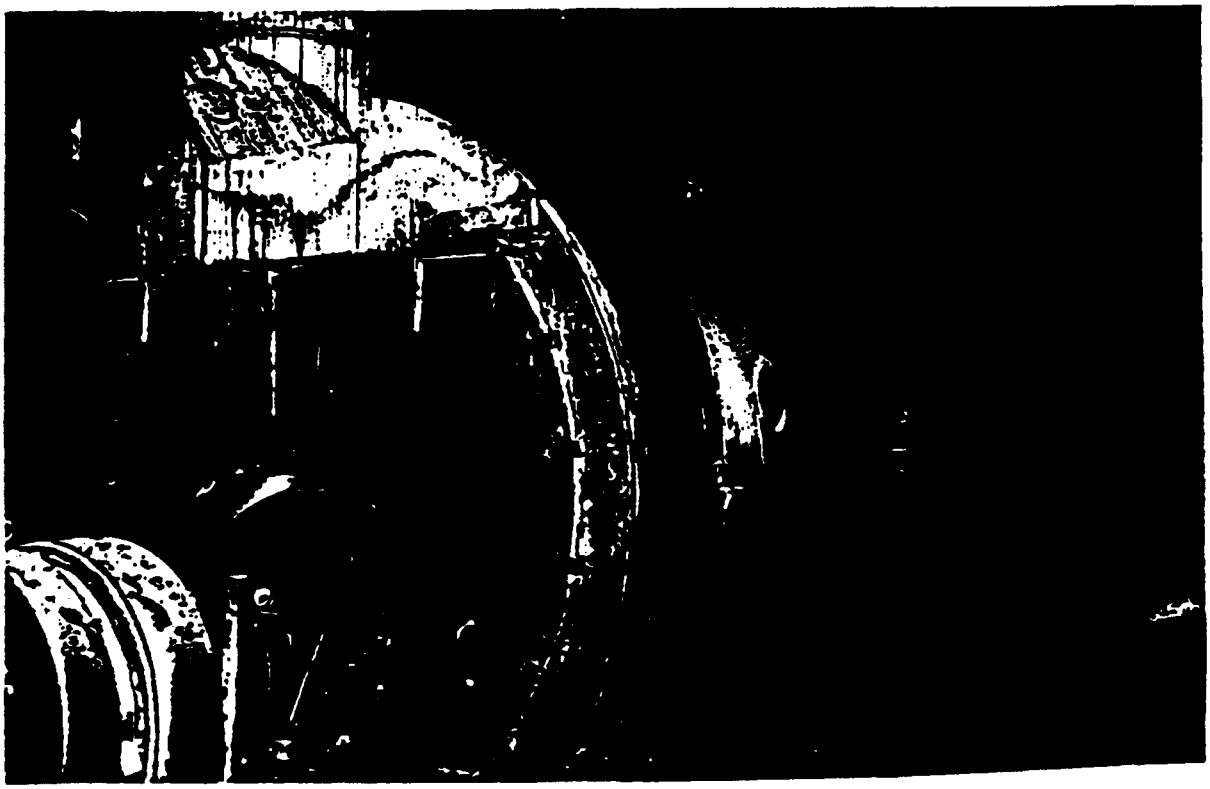


INSIDE SMALL BUILDING

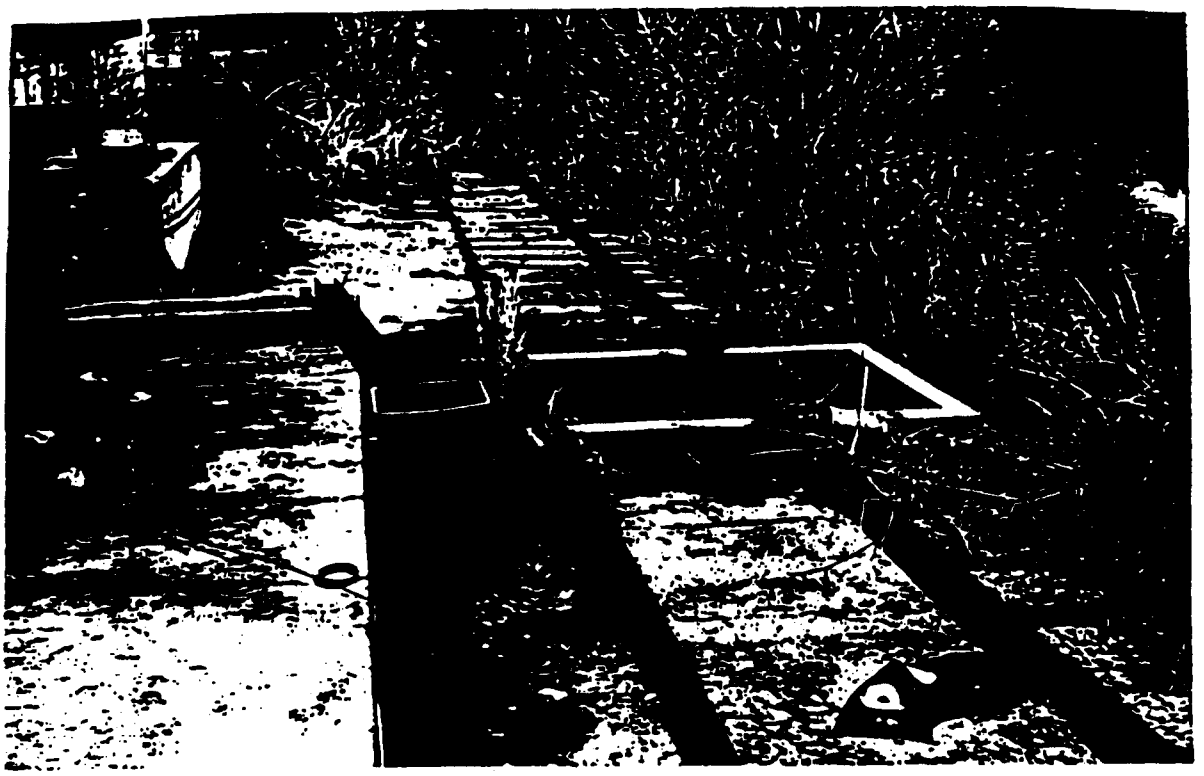
INSIDE LARGE BUILDING



INSIDE LARGE BUILDING



JACKETED BOILER

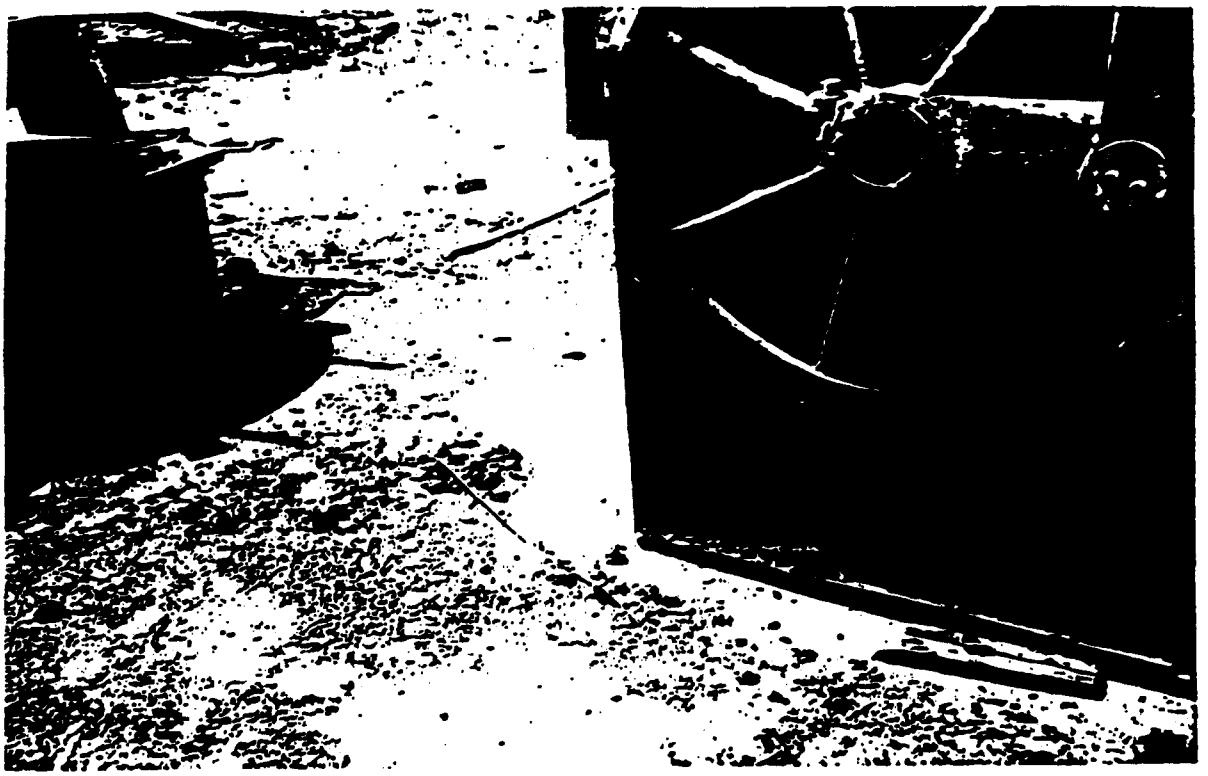


SAMPLE AREA #3

SAMPLE AREA #7

SAMPLE AREA #7

SAMPLE AREA #10



BACK OF LARGE BUILDING

SMALL BUILDING

TABLE I

TABLE I

SOIL ANALYSIS FOR TOTAL PETROLEUM HYDROCARBONS

LAB NO	SAMPLE ID	RESULT	MDL	UNITS	METHOD
M9204018	# 1	390	40	ug/G	418.1
M9204019	# 1A	60	40	ug/G	418.1
M9204020	# 2	100000	40	ug/G	418.1
M9204021	# 2A	140	40	ug/G	418.1
M9204022	# 3	670	40	ug/G	418.1
M9204023	# 3A	73	40	ug/G	418.1
M9204024	# 4	89000	40	ug/G	418.1
M9204025	# 4A	ND	40	ug/G	418.1
M9204026	# 5	ND	40	ug/G	418.1
M9204027	# 5A	ND	40	ug/G	418.1
M9204028	# 6	180000	40	ug/G	418.1
M9204029	# 6A	8400	40	ug/G	418.1
M9204030	# 7	140000	40	ug/G	418.1
M9204031	# 7A	3300	40	ug/G	418.1
M9204032	# 8	110000	40	ug/G	418.1
M9204033	# 8A	90	40	ug/G	418.1
M9204034	# 9	ND	40	ug/G	418.1
M9204035	# 10	3000	40	ug/G	418.1
M9204036	# 10A	ND	40	ug/G	418.1

ND: Not detected at concentrations greater than the method detection limit.
MDL: Method Detection Limit
ug/G: Micrograms per Gram (Equates to Parts Per Million)

SAMPLE ID	DEPTH	SAMPLE LOCATION
1	surface	underground storage tanks
1A	5 feet	underground storage tanks
2	surface	large above ground storage tanks
2A	3 feet	large above ground storage tanks
3	surface	railroad spur
3A	3 feet	railroad spur
4	surface	rusted above ground storage tank
4A	3 feet	rusted above ground storage tank
5	surface	silver above ground storage tank
5A	3 feet	silver above ground storage tank
6	surface	vessel by large transformer
6A	3 feet	vessel by large transformer
7	surface	south side of large building (middle)
7A	2 feet	south side of large building (middle)
8	surface	south side of large building (east corner)
8A	2 feet	south side of large building (east corner)
9	3 feet	Pond on southeast corner
10	surface	by service road
10A	2 feet	by service road

TABLE II

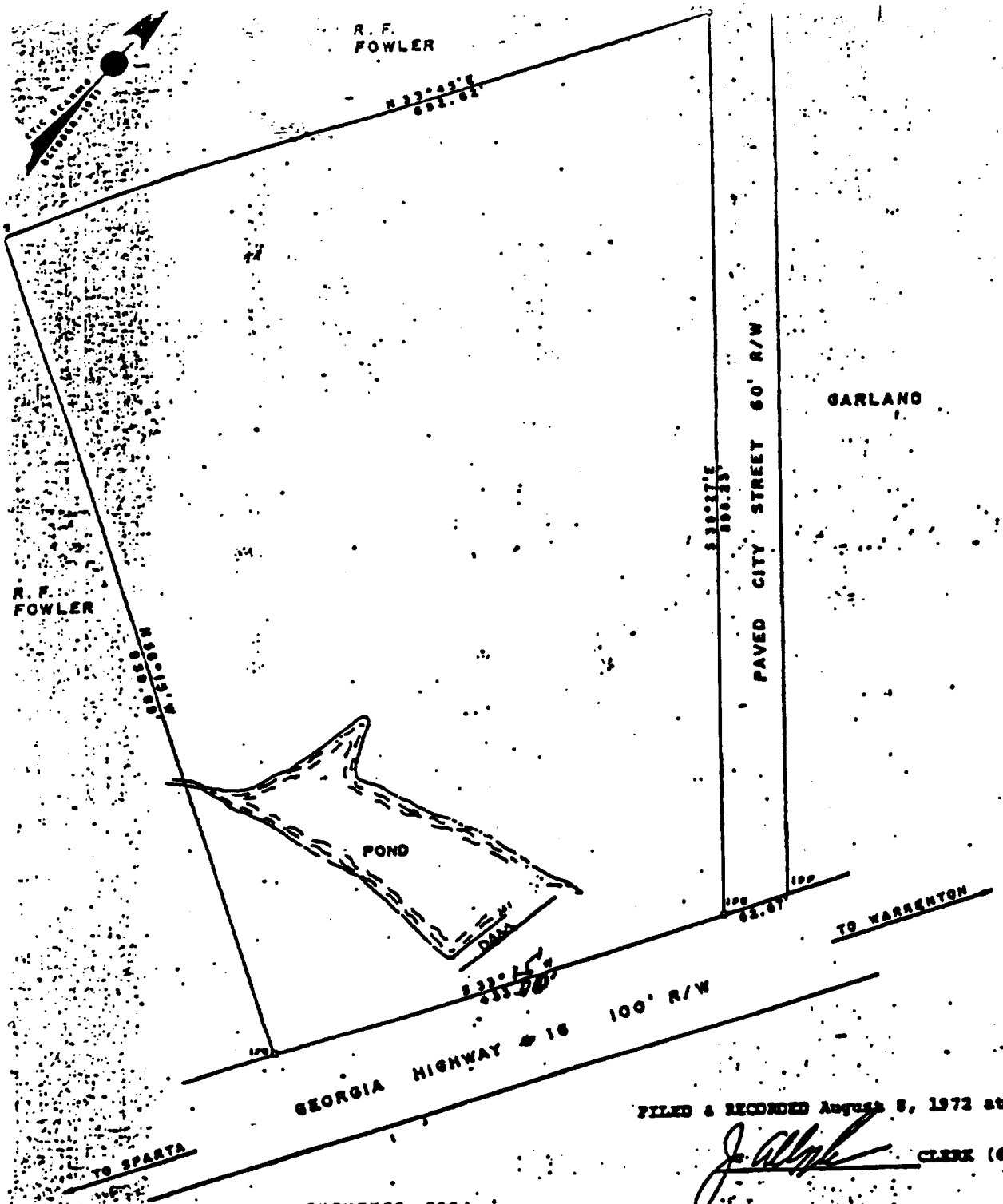
TABLE II

OBSERVED DRY CHEMICALS

AMOUNT	CHEMICAL
1 pallet	Zinc Oxide
1 pallet	Tetramethyl thiuram monosulfide
2 pallets	Monsanto accelerator
19 pallets	Hydrous Magnesium Silicate
3 pallets	Carbon black
3 cardboard drums	Methazal powder
4 bags	Stabelite ester resin
several bags	sulfur
6 large bags	unknown (possibly carbon)
2 pallets	unknown
7 cardboard drums	unknown

ATTACHMENT I

PLAT OF PROPERTY (REPRINT)



FILED & RECORDED August 8, 1972 at 9:30 a. m.

J. Allyle CLERK (6482)

SURVEYED FOR:

J. P. WILHOIT, JR. & E. C. Jessee &

11.11 ACRES J. S. Singletary

425TH G.M.D.

WARREN COUNTY, GEORGIA

SCALE: 1" = 100 FEET

DATE: MAY 16, 1972

In my opinion, this plat is a correct representation of the land platted and has been prepared in conformity with the minimum standards and requirements of law, surveyed by Forest & Land Svcs., Inc., Warrenton, Georgia, under the direction of T. Larry Rachels, R.L.S.

T. Larry Rachels, No. 1730

GEORGIA REGISTERED No. 1730 LARRY RACHELS

GSC ENVIRONMENTAL LABORATORIES

REPORT

THIS REPORT RELATES ONLY TO THE SPECIFIC SAMPLES TESTED AND/OR SPECIFIC INSPECTIONS PERFORMED AND MUST NOT BE REPRODUCED EXCEPT IN FULL AND ONLY WITH THE WRITTEN APPROVAL OF THE LABORATORY

April 16, 1992 Report Number: 166-1002-01

Client: Sherman & Hemstreet
123 Eighth Street
Augusta, GA 30901
Attn: Mr. Ralph Kitchens

Project: Warrenton Rubber Plant

On April 15, 1992, a representative of GSC ENVIRONMENTAL LABORATORIES INC., collected three (3) bulk sample(s) to be analyzed in accordance with EPA recommended dispersion staining techniques utilizing polarized light microscopy.

The results of samples taken are based on percentage estimates determined by observation of the sample using a stereo microscope.

All samples will be retained for a period of thirty (30) days unless further instructions are received from the client. This report relates only to the samples tested and must not be reproduced except in full and only with the approval of this laboratory.

All results are reported on Form # AS-04 attached to this report.

GSC ENVIRONMENTAL LABORATORIES, INC.

William J. Horning
Laboratory Director

ATT/AS-04

WJH/vjg

1824 A-3 WYLDS ROAD — AUGUSTA, GA 30909 — (404) 737-0185

April 16, 1992 Report Number: 166-1002-01

Table 1

Lab No.	Sample ID	Sample Location & Description	% Asbestos
92040682	01	INSIDE BUILDING 1-DEBRIS	NAO
92040683	02	INSIDE BUILDING 1-DEBRIS	NAO
92040684	03	INSIDE BUILDING 2-DEBRIS	NAO

END OF REPORT

LEGEND
NAO-No Asbestos Observed

Dec 18, 1990
Rev. 3

BULK SAMPLE ANALYSIS FOR ASBESTOS

Date: 04/16/92

Report No: 166-1002-01

Laboratory No.	92040682	92040683	92040684		
Sample ID	01	02	03		
Color	WHITE	WHITE	WHITE		
Homogeneous	YES	YES	YES		
Type & Percent Asbestos					
Chrysotile					
Amosite					
Crocidolite					
Other					
Total Asbestos	NAO	NAO	NAO		
Type & Percent Other Fibers					
Glass/Wool					
Cellulose	3	3	5		
Other					
Non-Fibrous Material					
Paint					
Binder/Filler	97	97	95		
Other					

Analyst: R. Forbes

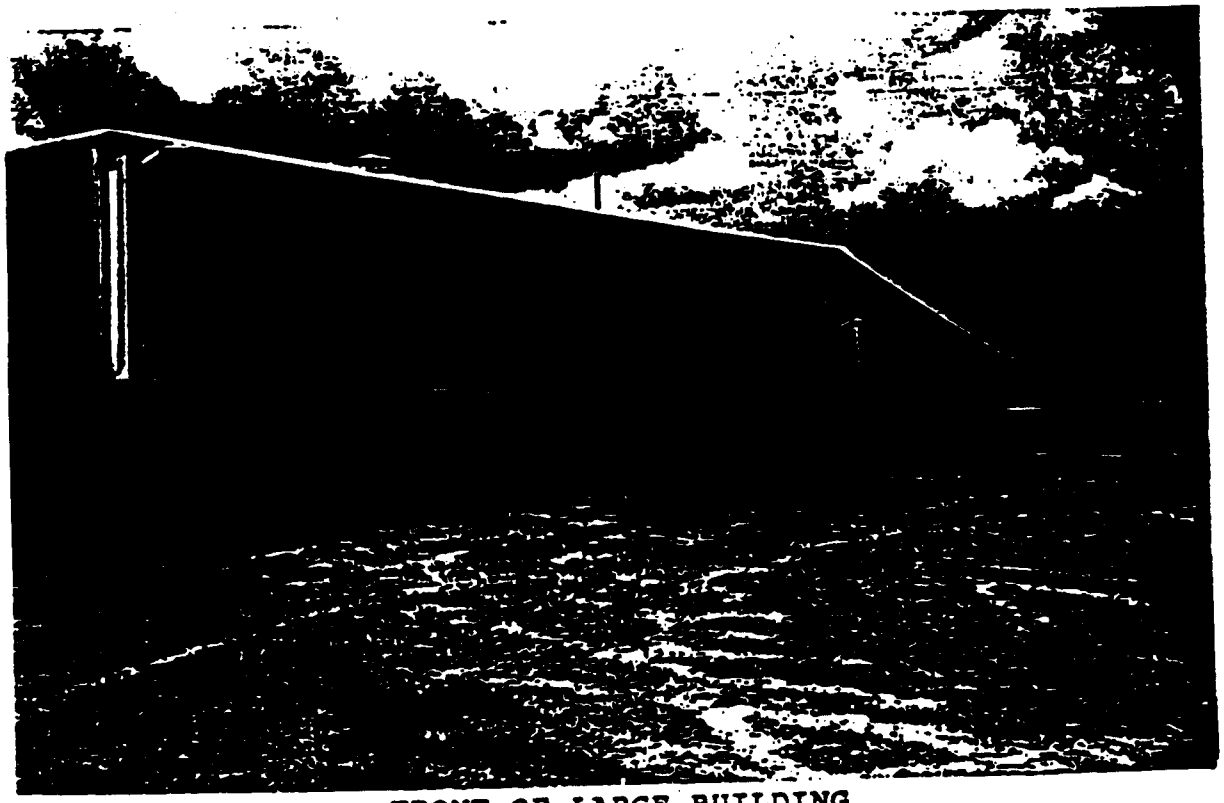
NVLAP Code Number: 1626

Analysis Method: EPA recommended PLM with dispersion staining. Percentage estimates are based on stereo microscope observation. The results of non-homogeneous and layered samples are based on the analyst's estimated composite for each individual component.

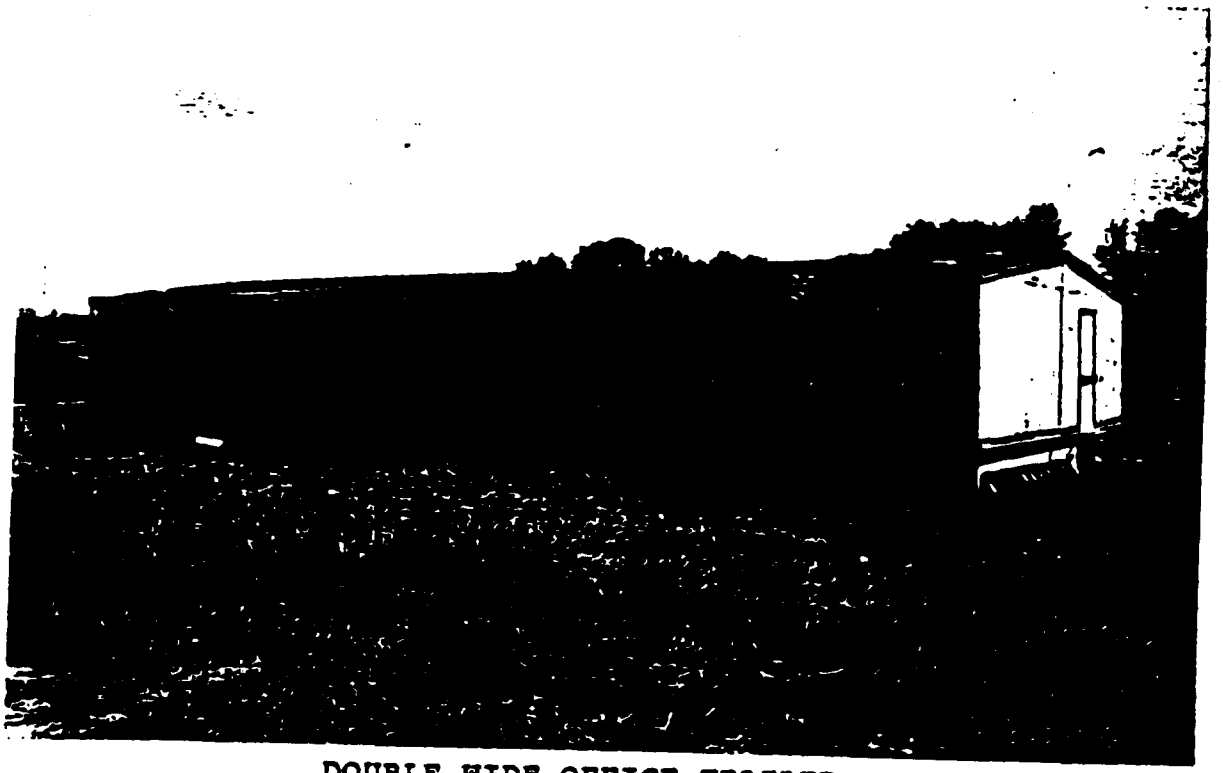
NAO = No Asbestos Observed

ATTACHMENT III
PHOTOGRAPHS

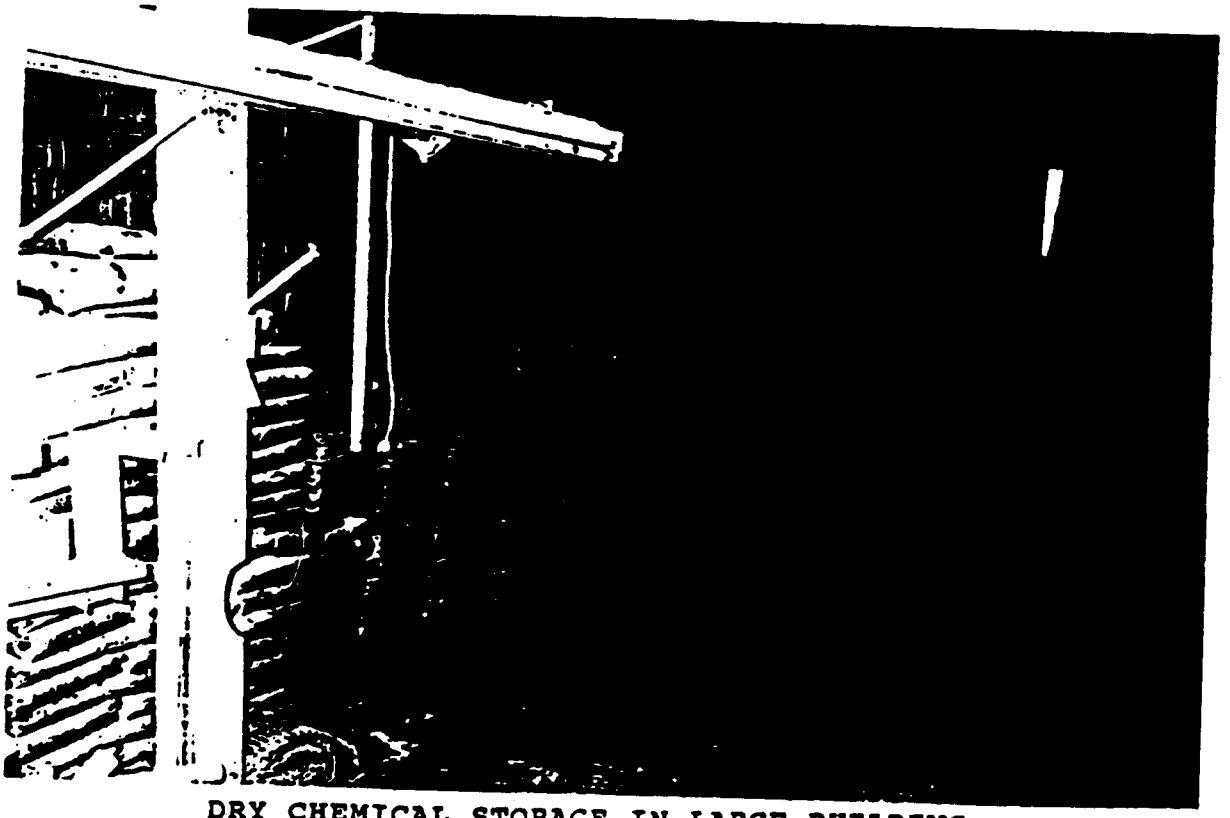
SITE FROM NORTH CORNER



FRONT OF LARGE BUILDING



DOUBLE WIDE OFFICE TRAILER



DRY CHEMICAL STORAGE IN LARGE BUILDING

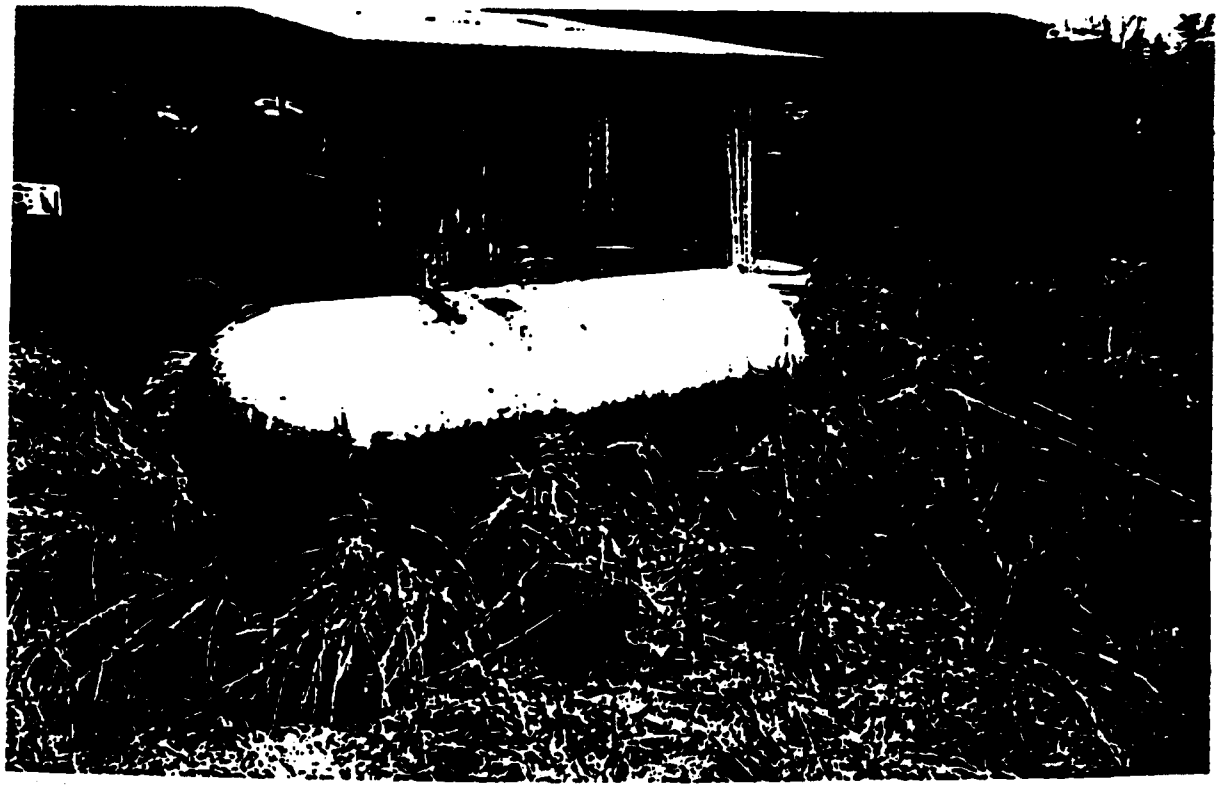
DRY CHEMICAL STORAGE IN SMALL BUILDING

DRY CHEMICAL STORAGE IN SMALL BUILDING

DRY CHEMICAL STORAGE IN SMALL BUILDING

UNDERGROUND STORAGE TANK
SAMPLE AREA #1

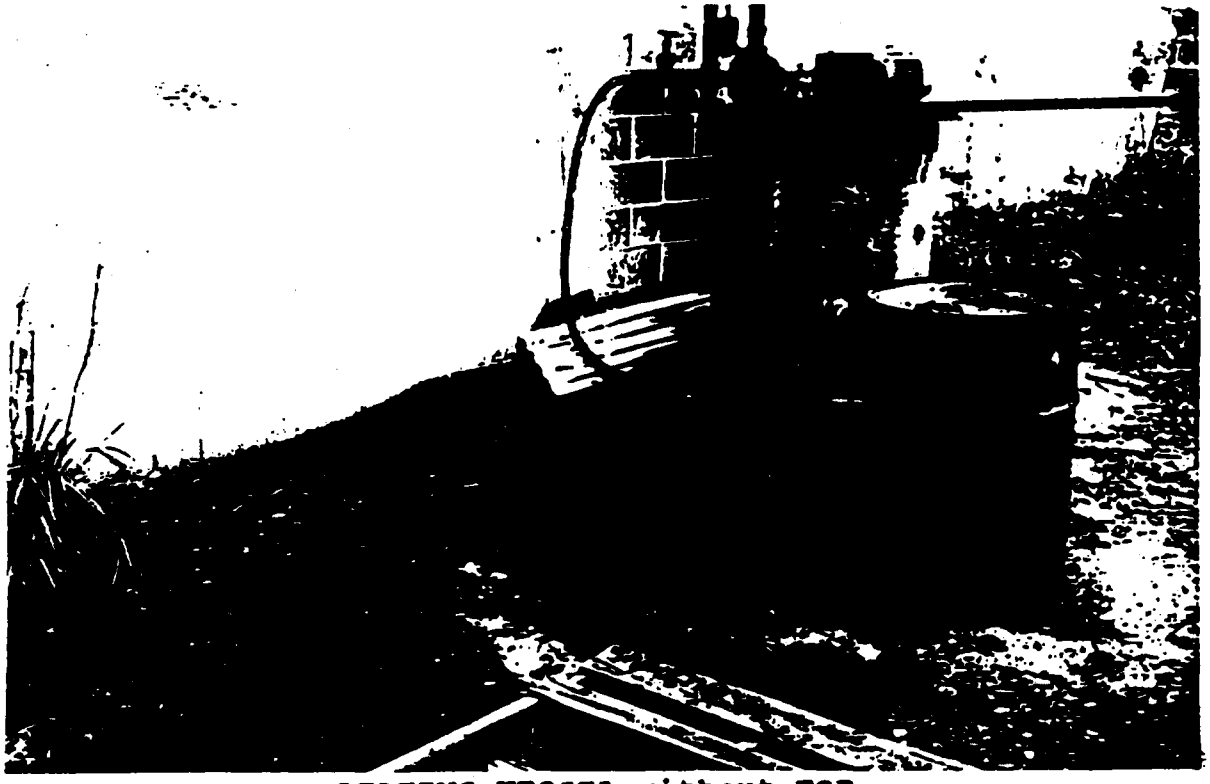
ABOVE GROUND STORAGE TANK
SAMPLE AREA #4



ABOVE GROUND STORAGE TANK
SAMPLE AREA #5

ABOVE GROUND STORAGE TANK and ASSOCIATED SPILL AREA
SAMPLE AREA #2

CONTINUATION OF SPILL AREA



LEAKING VESSEL without TOP
SAMPLE AREA #6

WASTE MATERIAL
SOUTH SIDE OF PROPERTY

BACK OF LARGE BUILDING

BACK OF LARGE BUILDING

Ref. 8

BRIAN E. BOVARD
3058 PACES STATION RIDGE
ATLANTA, GEORGIA 30339
(404) 435-8913

May 26, 1993

Hazardous Waste Management Branch
Georgia Environmental Protection Division
Floyd Towers East
205 Butler, S.E.
Atlanta, Georgia 30334

Re: E.H. Mann, Inc., d/b/a Warrenton Rubber Company, Debtor
Bankruptcy Chapter 7 Case No. 89-10699-JDS
Warrenton, Georgia Plant Site
EPA Form 8700-12

Dear Sir or Madam:

Enclosed please find a completed EPA Notification of Regulated Waste Activity Form 8700-12 for processing and assignment of an Installation ID Number.

Should anything further be required, please contact A. Stephenson Wallace, Trustee for the Debtor, whose address and phone number are listed on the Form.

Sincerely,

BEBovard

Brian E. Bovard

BEV/tc
Enclosure

cc: A. Stephenson Wallace, Esq.
James C. Frenzel, Esq.

02657\00001\tc6867

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

[X] A. First Notification

[ ] B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

II. Name of Installation (Include company and specific site name)

E.H. MANN, INC. DBA WARRENTON RUBBER

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 101 FOWLER STREET

Street (continued):

City or Town: WARRENTON

State: GA

ZIP Code: 30828-

County Code:

County Name: WARREN

IV. Installation Mailing Address (See instructions)

Street or P.O. Box: 462 Telfair Street

City or Town: Augusta

State: GA

ZIP Code: 30901-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last): WALLACE

(first): A STEPHENSON

Job Title: Trustee

Phone Number (area code and number): 706-722-7574

VI. Installation Contact Address (See instructions)

A. Contact Address: Location [ ] Mailing [X]

B. Street or P.O. Box:

City or Town:

State:

ZIP Code: -

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner: WARREN COUNTY DEVELOPMENT AUTH

Street, P.O. Box, or Route Number:

City or Town: WARRENTON

State: GA

ZIP Code: -

Phone Number (area code and number): -

B. Land Type: C

C. Owner Type: C

D. Change of Owner Indicator: Yes [ ] No [ ]

(Date Changed) Month Day Year

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [ ] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
   - [X] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other - specify
3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketer
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles *(See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. EP Toxic (D000)
X	X		X

(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s)) U220 U226

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
U220					
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
A. Stephen Wallace	Trustee in Bankruptcy	4/27/93

XI. Comments

F.H. Mann, d/b/a (dba business as) Warrenton Rubber Company is the sub-lessee of the subject property, is not operating, and is the Debtor in a pending proceeding in the U.S. Bankruptcy Court for the Southern District of Georgia, Augusta Division, Chapter 7, Case No.: 89-10699-JDS. Applicant is the Trustee in bankruptcy for the Debtor.

89

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Ref. 9

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

Memo
John McK

4WD-ERRB

Ms. Jennifer Kaduck, Chief
Hazardous Waste Management Branch
Environmental Protection Division
Department of Natural Resources
205 Butler Street
Suite 1154 - East Tower
Atlanta, Georgia 30334

SUBJ: Warrenton Rubber Company Site, Warrenton, Georgia

Dear Ms. Kaduck:

On February 23, 1995, the U.S. Environmental Protection Agency's Emergency Response and Removal Branch (ERRB) reviewed the available information for the above referenced site to determine its eligibility for a potential removal action under the National Contingency Plan (NCP). The site information was evaluated using criteria from Section 300.415 of the NCP and current ERRB program guidance.

Andrea Madigan, of the EPA Office of Regional Counsel, referred the Warrenton Rubber Company Site to ERRB on February 23, 1995. The [redacted]e included a [redacted].

The Site is located at 101 Flower Street in Warrenton, Georgia. The E.H. Mann, Inc., d/b/a Warrenton Rubber Company, has filed for bankruptcy. The transmittal letter stated that "...all potentially hazardous waste materials have now been removed from the Site...". The drum/product removal invoices indicated that 19 drums and an additional 1,950 gallons of bulked waste was disposed of by Alternate Energy Resources, Inc. between December 1993 and May 1994. A Phase II Soils Assessment was performed in 1990, in which 24 soil samples were obtained and analyzed. During the Environmental Assessment of October 1994, four soil samples and two groundwater samples were obtained and analyzed. The results of this sampling event indicated ranges from 25 to 130 ppm of Total Petroleum Hydrocarbons (TPH) in the soil and Below Detection Limit to 0.5 ppb of 1,1-Dichloroethane in the groundwater. The Removal Action Level for 1,1-Dichloroethane is 3,500 ppb, as defined in OSWER Directive 9360.1-02 Final Guidance on Numeric Removal Action Levels for Contaminated Drinking Water Sites.

Printed on Recycled Pape

Based upon ERRB's review of the available information, the site does not meet the criteria for removal eligibility. This determination does not preclude any other investigation activities or response actions by other parties which may still be appropriate for this site. Should site conditions change or additional information become available, ERRB will re-evaluate this site as necessary.

Should you have any questions concerning ERRB's determination, please contact Mrs. Samantha Urquhart-Foster, On-Scene Coordinator, at (404) 347-3931 extension 6102 or Mr. Shane Hitchcock, Chief of Removal Operations Section, at (404) 347-3931 extension 6122.

Sincerely,

Myron D. Lair, Chief
Emergency Response and Removal
Branch

cc: Narindar Kumar, Site Assessment Section, EPA
Andrea Madigan, EPA - ORC

Ref. 10

REPORT OF ADDITIONAL ENVIRONMENTAL ASSESSMENT
FORMER WARRENTON RUBBER COMPANY SITE
Warrenton, Georgia
AT&E Job No. 12452, Report No. 82031

Prepared for:

Mr. Steve Wallace
Bush & Wallace
462 Telfair Street
Augusta, Georgia 20901

Prepared by:

Atlanta Testing & Engineering
11420 Johns Creek Parkway
Duluth, Georgia 30136

October 4, 1993

TABLE OF CONTENTS

Page

1.0 INTRODUCTION 1

1.1 Background 1
1.2 Purpose and Scope 1

2.0 METHODS OF INVESTIGATION 2

2.1 Soil Borings 2
2.2 Environmental Sampling and Analysis 2

2.2.1 Soils 2
2.2.2 Groundwater 2

2.3 Decontamination 2

3.0 FINDINGS 4

3.1 Soil Borings 4
3.2 Environmental Results 4

3.2.1 Soil Quality 4
3.2.2 Groundwater Quality 4

APPENDICES

APPENDIX A - Tables and Figures

APPENDIX B - Laboratory Reports

TABLES

1. Geologist Logs of Hand-Auger Borings Completed August 17, 1993

2. Summary of Selected Soil and Groundwater Analyses

FIGURES

1. Boring Location Map

1.0 INTRODUCTION

1.1 Background

The subject site is located on Highway 16 in Warrenton, Georgia, and was formerly operated as the Warrenton Rubber Company. The site is presently unoccupied. The area of concern includes the outside plant support operations. These operations included an underground storage tank (UST) area (Area 1), and aboveground storage tank (AST) areas (Areas 2, 3 and 4). The plant facilities and areas of concern are shown on Figure 1.

Information was provided by Greene, Buckley, Jones & McQueen (GBJ&M) regarding previous environmental investigation completed at the site by OHM Corporation in 1990. This information indicated the occurrence of TPH concentrations in soil ranging from below detection limits (BDL) to 3810 ppm from a total of 34 samples. Purgeable halocarbon analysis of nine soil samples indicated all parameters were BDL, except for the occurrence of tetrachloroethylene (564 ppb) in one sample.

Based on the evaluation of the above data by GBJ&M, additional environmental assessment was warranted.

1.2 Purpose and Scope

The purpose of additional assessment was to validate previously reported significant TPH concentrations of selected soil samples in the vicinity of previous soil boring locations. The QA/QC of the previous analysis of these samples was suspect since they were collected below the water table, and/or may have been subject to positive interference associated with the analytical methodology (Method 418.1 or 9073) then used. In addition, it was desired to assess if potential impact to groundwater quality had occurred.

The approved work scope consisted of the following:

- Attempt to collect water table samples from four shallow borings near B-4, B-11, B-14 and B-17/B-18 (areas previously identified with highest TPH levels).
- Screen soil cuttings with an organic vapor analyzer (OVA).
- Analyze the water samples for Method 601/602.
- Analyze selected soils by more complete and accurate methodology including light-end (gasoline-TPH) components as well as heavier-end (diesel/oil) TPH components by gas chromatography (GC) by Methods 8015/8100.
- Prepare a brief report presenting the field methods, boring logs, analytical data, and findings.

A second site visit was required following evaluation of the initial site visit results. The additional work scope was approved by GBJ&M and Bush & Wallace before field work was initiated.

2.0 METHODS OF INVESTIGATION

2.1 SOIL BORINGS

Four hand-augered soil borings were completed from 6.5 to 7.5 feet below land surface (bls). As shown on Figure 1, the borings were completed adjacent to previous borings B-4 in Area 1 (HA-1), B-11 in Area 2 (HA-2), B-14 in Area 3 (HA-3) and B-17 in Area 4 (HA-4).

2.2 ENVIRONMENTAL SAMPLING AND ANALYSIS

2.2.1 Soils

[redacted] (PID). [redacted] ore PID results were not used to select samples for laboratory submission. Soil samples were obtained for analysis from the base (7 to 7.5 feet bls) of unsaturated borings HA-1, HA-2, and HA-4. Since groundwater occurred at a depth of 6.25 feet bls in HA-3, and the previous assessment indicated significant TPH concentrations (1920 ppm) at 4 feet bls in adjacent boring B-17, the soil sample from 3.5 to 4 feet bls was submitted to the laboratory for analysis.

Soil samples were placed in appropriate containers and stored on ice for delivery to Microbac Laboratories, Inc., Atlanta, Georgia. All soil samples were analyzed fo[redacted] compounds were analyzed by Method 8100.

2.2.2 Groundwater

On August 17, 1993, only [redacted] from the open borehole. Therefore, a groundwater sample was obtained with a disposable PVC bailer, and submitted for analyses for purgeabl[redacted] which include[redacted], and [redacted] by GC Methods 601 and 602.

Since an oily sheen had been observed on a bailer following an attempt to obtain a groundwater sample from HA-2, a second site visit was scheduled. On September 1, 1993, the water level in HA-2 had risen enough to provide an adequate volume of water to sample. No oily sheen was observed on the bailer or water sample, and the sample was submitted for Method 601/602 analyses.

2.3 DECONTAMINATION

Prior to hand-augering and between borings, the stainless steel hand auger bucket coming in contact with the formation was decontaminated. In addition, all environmental sampling equipment and measuring devices placed in boreholes were decontaminated between samples or measurements in the following sequence:

- Washed with Alconox detergent and/or steam-cleaned;
- Rinsed with deionized water;
- Rinsed with pesticide-grade isopropyl alcohol;
- Rinsed with deionized water;
- Air dried.

3.0 FINDINGS

3.1 SOIL BORINGS

Based on hand auger cuttings from the four borings, the surficial soil of the site consisted of a dry, fine to coarse sand, which extends to a depth of 2 to 3 feet below land surface (bls). Underlying the sand is a dry, slightly to moderately sandy clay, which has increasing moisture content until the boring completion depths of 7.5 feet (see Table 1, Geologist Logs).

On the day of boring completion, only boring HA-3/Area 3 (6.25 ft. bls) intercepted the water table. The hot, dry summer weather had resulted in a significant drop in the water table from that of the spring, 1990, when water levels in nearby borings ranged from approximately 2 to 6 feet (see Table 2). The water table had risen to 5.4 ft. bls in HA-2/Area 2 during the second site visit on September 1, 1993.

3.2 ENVIRONMENTAL RESULTS

3.2.1 Soil Quality

Soil screening with a PID indicated no volatile organic readings above background (see Table 1). TPH concentrations for volatile TPH components (Method 8015) ranged from levels below detection limits (BDL) to 4 ppm, indicating no significant contamination from volatile petroleum products (see analytical summary on Table 2). However, TPH concentrations from heavier petroleum products (Method 8100) range from 25 ppm at HA-1/Area 1 to 130 ppm at HA-2/Area 2. As indicated in the laboratory reports, the TPH-8100 results are generally associated with a light to medium oil. These results are consistent with known plant activities, which included storage of [redacted] ASTs in Area 2, 3, and 4.

[redacted] (1) positive-matrix interference which is possible with the TPH 9073 Method; (2) samples were generally taken below the water table, which can produce positive interference if not properly dried; (3) samples are not indicative of vadose zone soil quality when collected below the water table; and (4) the 8015/8100 GC Method is more reliable than Method 9073.

Therefore, based on the more reliable current soil quality data, while some soil contamination has occurred on site, it is consistent with the known petroleum products stored at the plant. In addition, based on observed water quality results, the site soil contamination has not impacted state or federal groundwater quality standards.

3.2.2 Groundwater Quality

Groundwater samples from HA-2 and HA-3 were BDL for all constituents except 1,1-Dichloroethane (1,1-DCA) in HA-3 at 0.5 ppb (which is the detection limit). Based on the above results, and the fact that only heavier petroleum products were known to have been stored at the plant facilities, there is little likelihood of VOCs occurring in site groundwater. The trace concentration of 1,1-DCA is not indicative of significant VOC occurrence, and does not warrant additional assessment based on known site activities.

TABLE 1

GEOLOGIST LOGS OF HAND-AUGER BORINGS COMPLETED AUGUST 17, 1993
FORMER WARRENTON RUBBER COMPANY SITE
WARRENTON, GEORGIA
AT&E Job No. 12452, Report No. 82031

Boring No.	Depth (ft.)	PID Reading (ppm)	Description
Area 1 - HA-1	0-2.5	0	Light brown; fine to medium sand; dry.
	2.5-7.5	0	Brown to dark brown; sandy clay, fine to coarse; dry with increasing saturation with depth, no groundwater at time of boring.
Area 2 - HA-2	0-2	0	Light to dark brown; fine to coarse sand; dry.
	2-7.5	0	Brown to dark brown; clay, some sand; dry, becoming wet with depth, trace groundwater at time of boring; oily sheen on bailer.
Area 3 - HA-3	0-2	0	Black, reddish-brown; fine to coarse gravelly sand; dry.
	2-6.5	0	Mottled grey and red; clay, some sand; dry to saturated with depth, groundwater 6.25 feet below ground surface.
Area 4 - HA-4	0-3	0	Light brown to brown; fine to coarse sand; dry.
	3-7.5	0	Brown, grey; clay, some sand; dry to wet at depth, no groundwater at time of boring.

TABLE 2

SUMMARY OF SELECTED SOIL AND GROUNDWATER ANALYSES
FORMER WARRENTON RUBBER COMPANY SITE
WARRENTON, GEORGIA
AT&E Job No. 12452, Report No. 82031

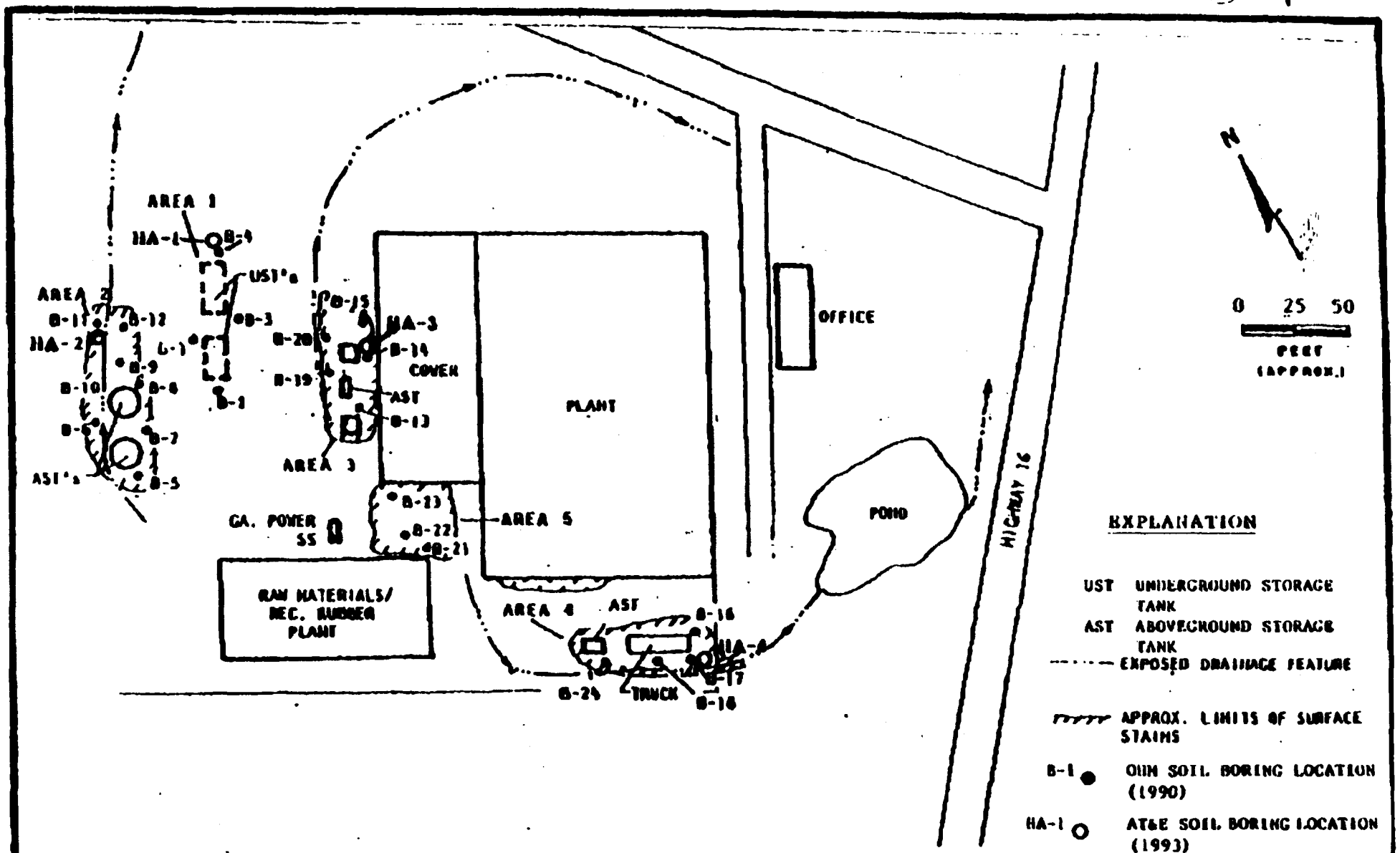
Location	Area 1		Area 2			Area 3		Area 4	
Boring	B-4	HA-1	B-11	HA-2		B-14	HA-3	B-17	HA-4
Date	3/28/90	8/17/93	3/28/90	8/17/93	9/1/93	3/28/90	8/17/93	3/28/90	8/17/93
Water Table Depth (ft)	2.3	>7.5	2	>7.5	5.4	±1.5-4	6.25	>5	>7.5
Soil Sample Depth (ft)	4	7.0-7.5	7	7.0-7.5		4	3.5-4.0	5	7-7.5
PID Reading (ppm)	--	0	--	0	--	--	0	--	0
TPH-9073[1]	1300	--	3810	--	--	1920	--	1240	--
Total Petroleum Hydrocarbons (as)	--	89	--	130	--	--	60	--	29
TPH-8015[2]	--	4	--	<2	--	--	<2	--	4
TPH-8100[3]	--	[illegible]	--	[illegible]	--	--	[illegible]	--	25
PAH[3]	--	BDL	--	BDL	--	--	BDL	--	BDL
VOC[4] (ppb) in groundwater	--	--	--	--	BDL	--	[illegible]	--	--

Notes: All concentrations in ppm, unless otherwise noted.

1. TPH by Method 9073
2. TPH by Method 8015 (purge and trap) for volatile TPH components.
3. TPH and PAH by Method 8100, for non-volatile heavier TPH components (diesel-oil range).
4. Volatile organic analyses by Method 601/602.
5. 1,1-Dichloroethane, all other parameters BDL.

Abbreviations: BDL = below method detection limit
-- = not analyzed

JC



SOURCE: MODIFIED FROM OHM CORP., PROJ. NO. 8737, PHASE II SOIL ASSESSMENT, KEARNEY-NATIONAL, INC., MAY 23, 1990.

DATE	DRAWN BY	CHECKED BY	SCALE	JOB NO	FIG. NO.
10/04/93	CLG			12452	1

atlanta testing & engineering

Florida • Georgia • Carolinas

BORING LOCATION MAP

FORMER WARRENTON RUBBER CO. SITE

WARRENTON, GEORGIA

atlanta testing
& engineering
11420 johns creek parkway / duluth, georgia 30136 / (404) 476-3556

October 4, 1993

Mr. Steve Wallace
Bush & Wallace
462 Telfair Street
Augusta, Georgia 20901

Re: Submittal of Report of Additional
Environmental Assessment
Former Warrenton Rubber Company Site
Warrenton, Georgia
AT&E Job No. 12452

Dear Mr. Wallace:

Atlanta Testing & Engineering (AT&E) is pleased to submit the accompanying report for your review. We appreciate the opportunity to assist Bush & Wallace and Greene, Buckley, Jones & McQueen with the environmental concerns of the Warrenton site.

If you have any questions concerning the report or any other aspects of the project, please contact me.

Respectfully submitted,

ATLANTA TESTING & ENGINEERING

Curt Gorman

Curt Gorman, P.G.
Manager of Remediation Services
Reg. Ga. 671

CG/jk

Attachments

cc: Mr. Jim Frenzel, Esq.

Alternate ENERGY Resources Inc. Energy for Industry

2730 WALDEN DRIVE • AUGUSTA, GEORGIA 30904 • 1/706/738-1571 • FAX 706/738/1581

Waste Oils
Industrial Fuel
Solvent Recycling

August 23, 1993

Mr. Brian Bovard
3058 Paces Station Ridge
Atlanta, Georgia 30339

Dear Brian:

Here is the inventory of the drums at Warrenton Rubber. Most of the drums are rusted and many of them are open. The samples we obtained were from drum #'s 4, 12, 26, and 49. I do not have the complete results from the lab yet on those samples but should have them very soon.

Drum #

BEHIND MAIN BUILDING

#1 empty Empty drum; no material
#2 oil/H2O labeled Ind Chem; drum is open, no labels, probably naphtha or toluene with water
#3 oil/H2O open drum; half full; rain water and unknown (?)
already tested #4 oil/H2O same as #3; open drum; water, toluene ?, etc.
#5 oil/H2O open and badly dented; half full; water and unknown
#6 toluene labeled toluene, flammable liquid; full?; sitting upside 2down
#7 oil/H2O labeled toluene, flammable liquid; open; maybe some rain water; rusted out on top; full of material
#8 empty partially full; open; rusted; labeled toluene, flammable liquid; probably some water
#9 oil/H2O closed drum; may be leaking on bottom; toluene or oil with toluene ?
#10 min. sp. full; closed; VM&P naphtha, flammable liquid UN1255
#11 min. sp. same as #10
already tested — #12 oil/H2O full; open; unknown material, rain water?, toluene?, naphtha?
#13 oil/H2O open; full; rusted out on top; unknown, toluene?, naphtha?, water?
#14 toluene unknown; full; closed drum with valve attached
#15 oil/H2O full; dirty oil and liquid on top of drum; unknown material
#16 empty Hydrosteam; liquid steam cleaner; 35-gallon drum
#17 oil/H2O VM&P naphtha and water; open
#18 empty labeled naphtha; EMPTY drum (rusted out on bottom)
#19 oil/H2O open; toluene and water; maybe 1/3 full
#20 oil/H2O open; full; VM&P naphtha, flammable liquid and water
#21 oil/H2O same as #20

IN PAINT SHACK

#22 chlor. oil Surett fluid; half full
#23 oil/H2O Exxon oil; full
#24 oil/H2O Exxon oil; may be half full; product on top of drum; open

Mr. Brian Bovard
Page 2

BESIDE PAINT SHACK (OUTSIDE)

#25 oil/H2O Exxon NUTO H-68 oil; full
Already tested — #26 other oil Surett fulid and water?; open; full
#27 empty Exxon NUTO H-68 oil; almost empty; open and upside down

BEHIND MAIN BUILDING (TO RIGHT OF PAINT SHACK)

#28 oil/H2O full; pinhole in top of drum; water and oil (NUTO H-68)
#29 solids INDUSTRIAL SOLID WASTE (valve stems)
#30 oil/H2O full; water and oil (NUTO H-68)
#31 solids solid material; half full; lids, rust, and some liquid
#32 oil/H2O open drum; full trash and rain water

DRIVEWAY BEHIND MAIN BUILDING

#33 empty EMPTY drum
#34 oil/H2O full; open; unknown
#35 solids empty drum labeled toluene; open top
#36 empty empty drum with sediment
#37 oil/H2O small amount water and sediment
#38 0 BTU unknown solids, drum on side, may be INDUSTRIAL WASTE (plastic, etc.)
#39 0 BTU same as #37
#40 solids about 5 gallons solid material; open to air
#41 solids same as #40

UST AREA

#42 oil/H2O toluene and water; 1/4 full;
#43 empty EMPTY drum (on its side); labeled toluene
#44 empty EMPTY; same as #43
#45 empty EMPTY; naphtha label
#46 empty EMPTY; toluene label

ABOVEGROUND STORAGE TANK AREA

#47 empty EMPTY; labeled oil
#48 empty some unknown liquid (drum laying on side)

OUTSIDE MIXING BUILDING (LEFT SIDE OF BUILDING)

Already tested — #49 oil/H2O full; open; rain water and unknown
#50 oil/H2O full; Exxon Teresstic and water
#51 oil/H2O open; VM&P naphtha and oil; full

Mr. Brian Bovard
Page 3

INSIDE MIXING BUILDING (LOWER LEVEL)

MSDS requested 8/31 → #52 oil/H2O Garnet II compressor oil (20-gallon drum that is 1/4 to 1/3 full); manufactured by LuBest (404) 355-4520 Stacey/Tracy - cust. svc

MSDS requested 8/24 → #53 grease Exxon Unival T-60 grease (solid) UNIVOLT 60

→ #54 grease Titan 993 (LuBest); 5-gallon grease (full) TITAN 999

INSIDE MIXING BUILDING (UPPER LEVEL)

#55 empty unknown residual, otherwise EMPTY
#56 corrosive plastic drum; corrosive liquid (MCP-25) 55-gallon drum approximately half full
#57 oil/H2O open pail 1/3 full (oil and grease and unknown)
#58 oil/H2O V-200 process oil (in plastic drum)
#59 oil/H2O process oil; full; open; product on top of drum
#59A oil/H2O 5-gallon can full of oil (same as #59)

INSIDE MIXING BUILDING (LOWER LEVEL)

#60 grease 25-gallon open drum; grease (Exxon Ronex MP)
#61 grease same as #60
#62 oil/H2O open; water and sediment (1/4 full)
#63 oil/H2O full; water and sediment and unknown

OUTSIDE (PARKING LOT AREA)

#64 empty EMPTY drum
#65 empty EMPTY drum
#66 empty EMPTY drum
#67 empty EMPTY drum
#68 oil/H2O open; full of water
#69 empty EMPTY drum
#70 empty EMPTY drum
#71 toluene labeled toluene, flammable liquid (Ashland Chemical); some product (1/ to 1/2 full)

INSIDE MAIN BUILDING

MSDS requested 8/24 → #72 Oakite Oakite 117, industrial solvent; full (35-gallon drum)
Oakite Company, Berkeley Hts., New Jersey (908) 464-6900
#73 solids Boiler feed water treatment (OX or GX OUT 401); label reads ChemCon
Atlanta (404)352-3170 (now W.R. Corbin office)
#73A solids 5-gallon bucket water treatment formula; full; ChemCon (same as #73)
#74 boil. treat. Controlex boiler water treatment; rust inhibitor
Balmar Corp., Decatur; (404)241-8880

INSIDE (NEXT TO LUNCH ROOM)

#75	oil/H2O	oil and water; 1/3 to 1/2 full; open 35-40 gallon drum
#76	grease	25-gallon drum Ronex oil MP (grease)
#77	grease	same as #76 (half full)
#78	grease	grease drum (same - Ronex)
#79	empty	thread lube (may be empty); Selig Chemical, Atlanta 691-9225
#80	grease	Ronex grease drum (25-30 gallon drum)
#81	grease	same as #80 (grease)
#82	grease	same as #80 (grease)
#83	grease	same as #80 (grease)
#84	solids	boiler treatment water (solid material)

M225 inspected 8/24 → #76

There were two additional drums behind a locked door in what appeared to be the former maintenance area of the plant.

When I get complete results on the samples we pulled, Brian, I will call you. If you have any questions, please call me.

Sincerely,

Judy Wenzel

Judy Wenzel
Sales Representative

08233jwo

#100	toluene	
#101	oil/H2O	
#102	[redacted]	same as #30
#103	oil/H2O	
#104	empty	
#105	oil/H2O	
#106	grease	

Ref. 15

OHM Corporation

May 23, 1990

Kearney National, Inc.
c/o H. Derrick Peterson
Bryan, Cave, McPheeters, & McRoberts
1015 Fifteenth Street NW
Washington, DC 20005-2689

RE: Phase II Soils Assessment, Warrenton Rubber Plant
Warrenton, Georgia

Dear Mr. Peterson:

OHM Remediation Services Corp., a subsidiary of OHM Corporation, (OHM), has developed this letter report to describe the findings of Phase II of the Soils Assessment of the Warrenton Rubber Company facility located on Highway 16 in Warrenton, Georgia.

Appendices A through C are attached to this document. Appendix A of this document contains the Phase I report. Soil boring logs are presented in Appendix B, and Phase II analytical results are provided in Appendix C.

During the Phase I investigation, physical evidence (i.e., surface staining) was identified at several locations. Two soil samples were collected from the 0 to 6-inch depth interval and analyzed for Total Petroleum Hydrocarbons (TPHCs). The first soil sample (No. 7519-5), collected northwest of the horizontal above-ground storage tank (AST) located west of the main plant, revealed the presence of TPHCs at a concentration of 3030 ppm. The second soil sample (No. 7519-6), collected downgradient (northeast) of the two vertical ASTs on the northwest boundary of the property revealed TPHCs at a concentration of 860 ppm. Four surface water samples were collected from on-site intermittent streams and a small pond located on the southeast portion of the site. These samples were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX). However, no compounds were present above the detection limit.

Phase II of the environmental assessment was performed in order to further characterize the site. During this phase, five areas were selected for further investigation (See Figure 1, attached). These areas were chosen because of their proximity to chemical storage tanks, because of previous site activities, or due to the apparent presence of physical evidence of contamination. A brief description and summary of the soil investigation performed at each area is as follows:

13400 Mohawk Road ■ P.O. Box 121190 ■ Clearwater, Florida 34712-1190 ■ 904-394-8601

AREA 1

Area 1 is located in the center of the open area north of the Main Plant and houses two underground storage tanks (USTs) of unknown age. Reportedly, the western tank is a 1500-gallon solvent tank containing approximately 2½ feet of liquid, and the eastern tank is a 500-gallon fuel oil tank that contains approximately 8-inches of an oily liquid. Four soil borings were constructed in this area; samples were collected from several depth intervals. Surface soils above the USTs were stained. No obvious staining of subsurface soils was noted, but a strong hydrocarbon odor was encountered in boring B-4. Groundwater was encountered at depths of 1.8 feet to 3.3 feet below ground surface.

AREA 2

Area 2 is located near the northwest property boundary and houses two vertical ASTs situated on a concrete pad. These tanks reportedly contain processing oil used in the manufacturing of inner tubes. A sheen was present on surface waters in this area. Soils were stained from the surface to a depth of approximately 4 feet. Five soil borings and three hand auger borings were drilled in this area. Groundwater was encountered at a depth of 2 inches to 5 feet below land surface.

AREA 3

Area 3 is located adjacent to the covered work area and houses a horizontal AST and two storage sheds that contain several 55-gallon drums labeled Nuto-66, Naphtha, and Toluene. Soils in the area were stained. Three soil borings and two hand auger borings were performed in this area. Groundwater was encountered from a depth of 6 inches to greater than 10 feet (boring B-14 contained no water).

AREA 4

Area 4 is located near the southwest corner of the main building and encompasses one horizontal AST and a truck tanker situated on a concrete slab. The AST reportedly contains processing oil. In this area, an oily sheen was present in surface runoff and soils were stained. One soil and three hand-auger borings were performed in this area. Due to heavy rainfall during drilling, depth to groundwater could not be determined; however, the groundwater depth is estimated to be 0 to 2 feet below land surface.

AREA 5

Area 5 is the open area west of the main building that is bounded by the Georgia Power Company transformers, the raw materials plant, and the main building. In this area, an oily sheen was present on surface runoff waters, and surface soils were stained. Numerous hand-auger borings were attempted in this area; however, due to a layer of gravel and cobbles, the hand augers could not be advance beyond 1½ feet. Access with the drill rig was not possible due to extremely wet conditions to the north and equipment blocking the access through the plant. Therefore, conclusions concerning the sub-surface conditions in this area cannot be made.

During the soil investigation, soil boring logs were maintained in the field (see Appendix B). All samples were retained in glass sample jars, placed on ice in a cooler, and transported to ETC-Florida Laboratory in Clermont, Florida for analysis. A total of sixty-one samples were collected during this sampling event. Near surface samples with obvious staining were not analyzed as a cost-saving measure. Thirty-four samples were analyzed for TPHCs (EPA Test Method 9073), and nine samples were analyzed for purgeable aromatics/purgeable hydrocarbons (EPA Test Method 8010/8020).

EPA Test Method 8010/8020 analyses were performed on samples collected from Areas 2 and 3. One sample, collected from the 2-foot depth interval of boring B-2, contained Tetrachloroethylene at a concentration of 0.564 ppm. No detectable levels of EPA Test Method 8010/8020 compounds were found in the other eight samples. Analytical results of the purgeable aromatics/purgeable halocarbon sample analyses are summarized in Table 1, attached. Complete analytical results of the Phase II sampling are presented in Appendix C.

TPHC analysis is performed using an Infrared Spectrophotometer which measures the carbon double bond stretch and detects compounds related to gasoline, diesel, oils, lubricants, and greases (petroleum products). Pursuant to the Georgia Environmental Protection Department Chapter 391-3-15.09, a 100 ppm (mg/kg) action level for TPHCs has been established for soils on-site containing petroleum-related compounds in the vicinity of USTs which are located within a ½-mile radius of water wells.

Of the thirty-four samples analyzed by EPA Test Method 9073, thirteen contained TPHCs at concentrations exceeding the 100 maximum contaminant level. The TPHC analyses are summarized in Table 2, attached. Complete analytical results are presented in Appendix C.

Potential off-site sources of contamination have been researched. Immediately surrounding the facility to the south, southwest, and west, land use is predominately for farming purposes. The presence of herbicides and pesticides is expected in the vicinity of the study property. However, excessive contamination from these compounds was not evidenced in this investigation.

Facilities surrounding the study property include Health Tech Children's Clothing manufacturing facility to the northeast, and a sewage treatment settling pond to the east. Cursory review of the operations of each of these facilities, in our opinion, identifies each as posing an insufficient environmental threat.

Potential off-site receptors of contamination typically include downgradient private and municipal water sources. Direction of groundwater flow in this physiographic region typically follows the surface topography. Assumed groundwater flow direction is toward the southeast.

Warrenton City Water Department reports that Watershed Project No. 46 supplies the City of Warrenton and some of the county. This supply source consists of a 125-acre pond located approximately one mile to the west of the study property. Only one private well, operated by a dairy farm approximately 1/4 mile to the west, is reported.

OHM's evaluation of soil quality on this site indicates the following:

- No significant elevated levels of EPA 8010/8020 compounds were noted in soils.
- Elevated levels of TPHC were found in the soil in all investigated areas.
- During the site investigation, OHM personnel observed a sheen of hydrocarbons in surface water in all three draining areas.
- The relatively extensive hydrocarbon contaminants of soils on site and the high groundwater conditions suggest the possibility for groundwater contamination. In Georgia, all subsurface waters are considered drinking water; therefore, EPA safe-drinking-water standards may apply.
- It is unclear from our discussions with the Georgia Department of Natural Resources (DNR) representative whether the entire site will be considered under the UST regulations. We consider it prudent at this

juncture that the most stringent soil clean up criteria of 100 ppm, for TPHC concentrations and 20 ppm for total volatiles (BTEX) be used.

- No off-site sources of contamination have been identified during our evaluation.

- No off-site potential receptors of contamination have been identified immediately hydraulically downgradient to the study property.

Soils contaminated with oil should be excavated and properly disposed of to prevent the further spread of hydrocarbon contamination. The soils should be removed until only visually "clean" soils remain and these "clean" soils should be sampled to verify TPHC levels below the State of Georgia action level of 100 ppm.

It is visually estimated that approximately 2,000 cubic yards of soil may need to be excavated and properly disposed. These soils should be acceptable for disposal at a lined industrial landfill; however, further analytical sampling will be required prior to acceptance. If the soils cannot be disposed of in an industrial landfill, off-site or on-site incineration is an option.

Please note that if the high groundwater conditions prevalent at the time of this investigation persist during excavation, dewatering may be necessary and treatment of these waters may be required. In addition, excavation in areas 3 through 5 may have the potential to undermine the foundations of the Raw Materials/ Recycled Rubber Plant and the cover at the rear of the Main Plant. It may be necessary to brace the excavations to prevent damage to these structures.

Removal of soil in Areas 1, 2, 3, and 4 will require removal/ disposal of ASTs, USTs, and small storage buildings. All removal should be in accordance with industry practices and applicable state regulations. During removal of the soil, the operations should be inspected by an environmental professional to document the presence of any oil-contaminated soil and verify that remaining soils are below the 100 ppm action level.

The presence of contaminated soil on this property where the groundwater table occurs at or just below land surface indicates a high possibility for groundwater contamination. Unlike soil contamination, groundwater contamination has a tendency to move in a direction and at a rate consistent with groundwater flow. Therefore, groundwater contamination may spread both vertically and horizontally. An assessment of groundwater quality requires the placement of monitor wells and collection/analysis of groundwater samples. A groundwater quality assessment is recommended

to complete this property assessment and to accurately determine cleanup requirements.

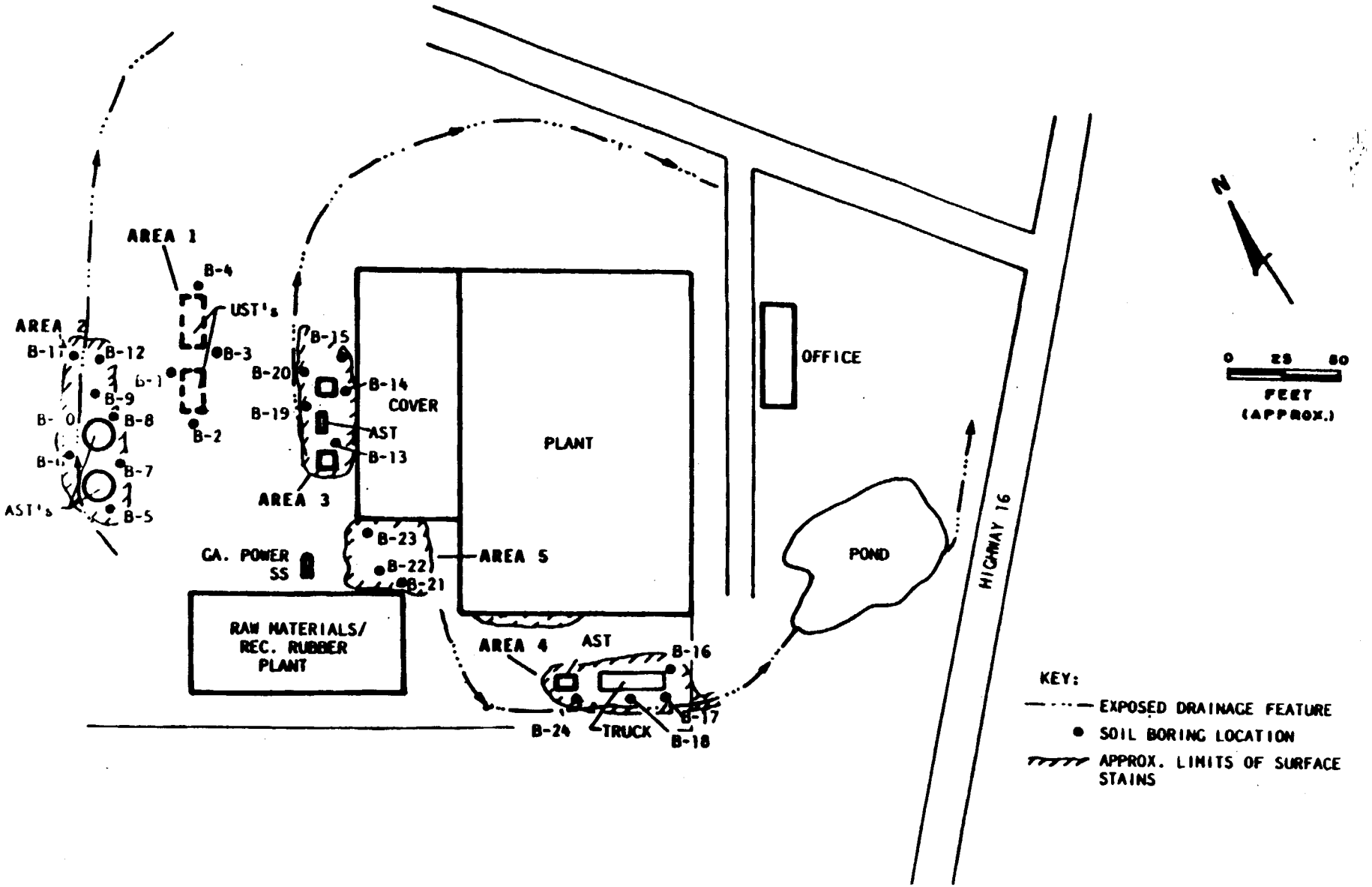
If you have any questions or comments, please do not hesitate to contact me at 407-241-8903.

Sincerely,

Rodney K. Morrison

Rodney K. Morrison, P.G.
Hydrogeologist

Attachment



PROJECT: KEARNEY-NATIONAL

PROJECT No. 8737

FIGURE 1 Site Plan Showing Boring Locations and Surface Stain Areas

TABLE 1

PURGEABLE AROMATICS AND
PURGEABLE HALOCARBON DATA SUMMARY

Sample	Depth (Feet)	Concentration
B-1	2	All compounds BDL
B-2	2	*
B-3	2	All compounds BDL
B-4	2	All compounds BDL
B-13	4	All compounds BDL
B-14	4	All compounds BDL
B-15	1	All compounds BDL
B-19	4	All compounds BDL
B-20	5	All compounds BDL

*Tetrachloroethylene at 0.564 mg/Kg, all other compounds BDL.

BDL = Below Detection Limit

TABLE 2

TOTAL PETROLEUM HYDROCARBON DATA SUMMARY

Sample	[illegible]	Depth (ft)	TPHC (ppm)
B-1		2	<5
B-1		8	9.6
B-2		2	<5
B-2		8	<5
B-3		2	<5
B-3		8	<5
B-4	2.3'	2	156
B-4		4	1300
B-4		8	<5
B-5		3.5	7.47
B-6		4	7.65
B-7		4	7.30
B-8		4	31.9
B-8		8	141
B-9		4	9.89
B-9		8	<5
B-10		4.5	35.9
B-11		4.5	10.5
B-11	2'	7	3810
B-12		1	13.1
B-12		4	<5
B-13	3.5'	7	1540
B-13		4	105
B-14		1	116
B-14	not encountered	4	1920
B-15		1	227
B-15		4	133
B-16		1	120
B-16		4	35.9
B-17	not encountered	5	1240
B-18	not encountered	5	542
B-19		4	49.1
B-20		5	<5
B-24		5	7.56

< = Less than Detection Limit

1.0 INTRODUCTION

Kearney-National, Inc. has retained O.H. Materials Corp. (OHM) to perform a pre-acquisition environmental assessment of a property on Highway 16 in Warrenton, Georgia. This environmental assessment has been conducted to provide a determination of any potential, or existing, environmental liabilities associated with the presence of contamination on the property originating from on-site or off-site sources.

The environmental assessment included a background search, visual site inspection, interviews, and sampling of the site surface soils and laboratory testing of the recovered samples.

This assessment was performed pursuant to completion of work described in a proposal (No. 0003380) dated June 9, 1989, and authorized by an agreement signed by John Delaney dated June 26, 1989.

TABLE OF CONTENTS

EXECUTIVE SUMMARY

1.0 INTRODUCTION..... 1-1

2.0 PURPOSE AND SCOPE OF THIS ASSESSMENT..... 2-1

2.1 PURPOSE..... 2-1
2.2 SCOPE..... 2-1

3.0 LOCATION AND SITE DESCRIPTION..... 3-1

3.1 LOCATION..... 3-1
3.2 SITE DESCRIPTION..... 3-1

FIGURE 3.1, SITE LOCATION MAP..... 3-2
FIGURE 3.2, SITE PLAN..... 3-3

4.0 INVESTIGATIVE METHODS..... 4-1

4.1 VISUAL SURVEY AND INTERVIEWS..... 4-1
4.2 SAMPLING AND ANALYTICAL..... 4-1
4.3 DISCUSSIONS WITH THE USEPA AND GEPD..... 4-1

5.0 ANALYTICAL RESULTS FOR SOIL..... 5-1

5.1 SAMPLING AND ANALYSIS OF SITE SOILS..... 5-1

FIGURE 5.1, SAMPLE LOCATIONS..... 5-2

6.0 ENVIRONMENTAL SETTING..... 6-1

6.1 GEOLOGY..... 6-1
6.2 HYDROGEOLOGY..... 6-1
6.3 WATER USAGE..... 6-1

7.0 DISCUSSION..... 7-1

7.1 PROPERTY USE..... 7-1
7.2 SURROUNDING PROPERTY USE..... 7-3

8.0 SUMMARY AND RECOMMENDATIONS..... 8-1

8.1 SUMMARY OF FINDINGS..... 8-1
8.2 RECOMMENDATIONS..... 8-1

APPENDIX A - INTERVIEWS

APPENDIX B - ANALYTICAL RESULTS

APPENDIX C - INDUSTRIAL HYGIENE CONSULTATION REPORT

2.0 PURPOSE AND SCOPE OF THIS ASSESSMENT

The following sections describe the work performed by OHM during this assessment.

2.1 PURPOSE

The purpose of this environmental assessment was to identify any environmental liabilities associated with the ownership of this property on Highway 16, Warrenton, Georgia.

2.2 SCOPE

To achieve the ends of this assessment, OHM completed the following scope of work:

- Review of regionally specific geologic and hydrologic data
- Review of topographic maps
- Interviews with individuals familiar or associated with the property both in its present and past uses
- Field evaluations, including visual observations of the existing site facilities, utilities, surface water, rock, surface soil conditions, vegetation types, ground surface contours, fill areas, excavation areas, roadways; unusual surface conditions including stained ground, refuse areas, revegetated areas, unusual drainage channels, and unusual soil color, texture, or appearance
- Facility inspections included visual evaluations of conditions of the existing structure. The site was inspected for the presence of waste materials, waste disposal, presence of power generators, batteries or storage tanks (both above and below ground), septic fields, and the condition of the facilities.
- Soils sampling and submission of the samples to a laboratory for analyses for compounds or components of concern
- Regulatory review, including discussions with the Georgia EPA and the USEPA with regard to CERCLA records and the presence of hazardous materials on or near the site

Submittal of this report concludes the scope of OHM's services as detailed by our June 9, 1989, proposal, which excluded considerations of radon or asbestos.

0 1/2 MILE

SOURCE: U.S.G.S. 7.5' QUAD MAP, WARRENTON, GA., 1972, PHOTOREVISED 1987.

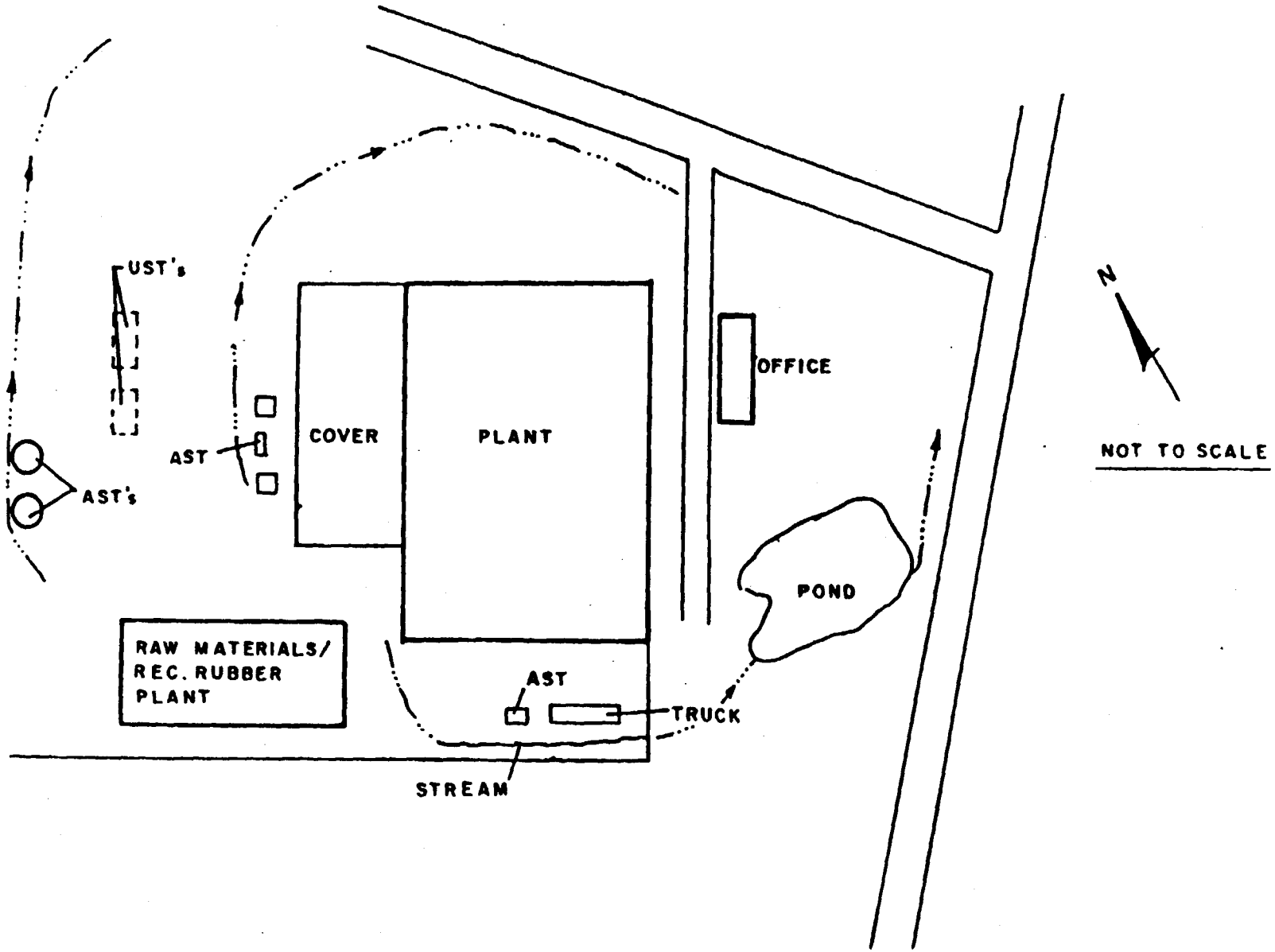
PROJECT: KEARNEY-NATIONAL

PROJECT No. 7519

LOCATION: WARRENTON, GA.

Figure 3.1. Site Location Map.

OHM
The Environmental Services Company



PROJECT: KEARNEY-NATIONAL
PROJECT No. 7519
LOCATION: WARRENTON, GA.

Figure 3.2. Site Plan.

OHM
The Environm Services Company

3.0 LOCATION AND SITE DESCRIPTION

3.1 LOCATION

The Warrenton site is an approximately 10 acre lot on which two structures, approximately 50,000 square feet and approximately 5,000 square feet, have been constructed. These buildings were constructed in 1974. The site is located on on Highway 16 in Warrenton, Georgia (see Figure 3.1).

3.2 SITE DESCRIPTION

The site consists of a 10 acre industrial plot of land on which two buildings, approximately 50,000 square feet and approximately 5,000 square feet, have been constructed. Rectangular in shape, the lot is set off Highway 16 and an access road serves to connect the property to the highway (see Figure 3.2). There is a parking area immediately southeast of the main structure. Photos 1 and 2 show the property in views from east to west and northeast to southwest, respectively.

The property is bordered on the south by trees and there is a small pond on the southeastern portion of the site (Photo 1). The surrounding area is rural industrial.

Topography at the site is sloping to the southeast. Site soils and terrain are consistent with those expected in this area. The surficial soils consist of fine sand to clay sized soil.

4.0 INVESTIGATIVE METHODS

The following sections describe the procedures OHM followed during the investigation of the property on Highway 16 in Warrenton.

4.1 VISUAL SURVEY AND INTERVIEWS

To initiate this environmental assessment, an OHM inspector walked the entire area of the site and documented his observations along the way. Interviews with persons familiar with site usage were completed and these interviews are included in Appendix A.

4.2 SAMPLING AND ANALYTICAL

Soil samples were recovered from areas suspected of having contaminants. Two soil samples were taken from northwest and far northwest areas at this site. These soil samples were taken from the upper 6 inches of soil in areas suspected of containing hydrocarbon contamination or showing oil staining.

Surface water samples were recovered from the pond located on-site along with influent and effluent streams to the pond. A water sample was also retrieved from stagnant water in a drainage ditch on the northeastern portion of the site.

4.3 DISCUSSIONS WITH THE USEPA AND GEPD

OHM has contacted the U.S. Environmental Protection Agency (USEPA). OHM was informed that no hazardous waste dumping, storage or spillage have been reported at this site. No USEPA actions are existing against this facility or adjacent facilities.

OHM has consulted the Georgia Environmental Protection Division's (GEPD) files of reported hazardous waste sites. The property in question was not listed nor were any properties in the area of the site listed in the file.

5.0 ANALYTICAL RESULTS FOR SOIL

5.1 SAMPLING AND ANALYSIS OF SITE SOILS

Two soil samples were collected as mentioned in Section 4.2. These soil samples were analyzed and the results may be seen in Appendix B. The soil samples were recovered from the northwestern and far northwestern portions of the property. The locations of these soil samples may be seen in Figure 5.1. More detail of the sample areas is shown in Photos 3 and 4. Sample locations include an area used for storage of flammable (hydrocarbon) materials and an AST reported to contain gasoline (Sample 7519-5) and an above-ground storage tank (AST) area (Sample 7519-6).

The soil samples were tested for Total Petroleum Hydrocarbon (TPHC) using EPA Methods. The following summarize the analytical results:

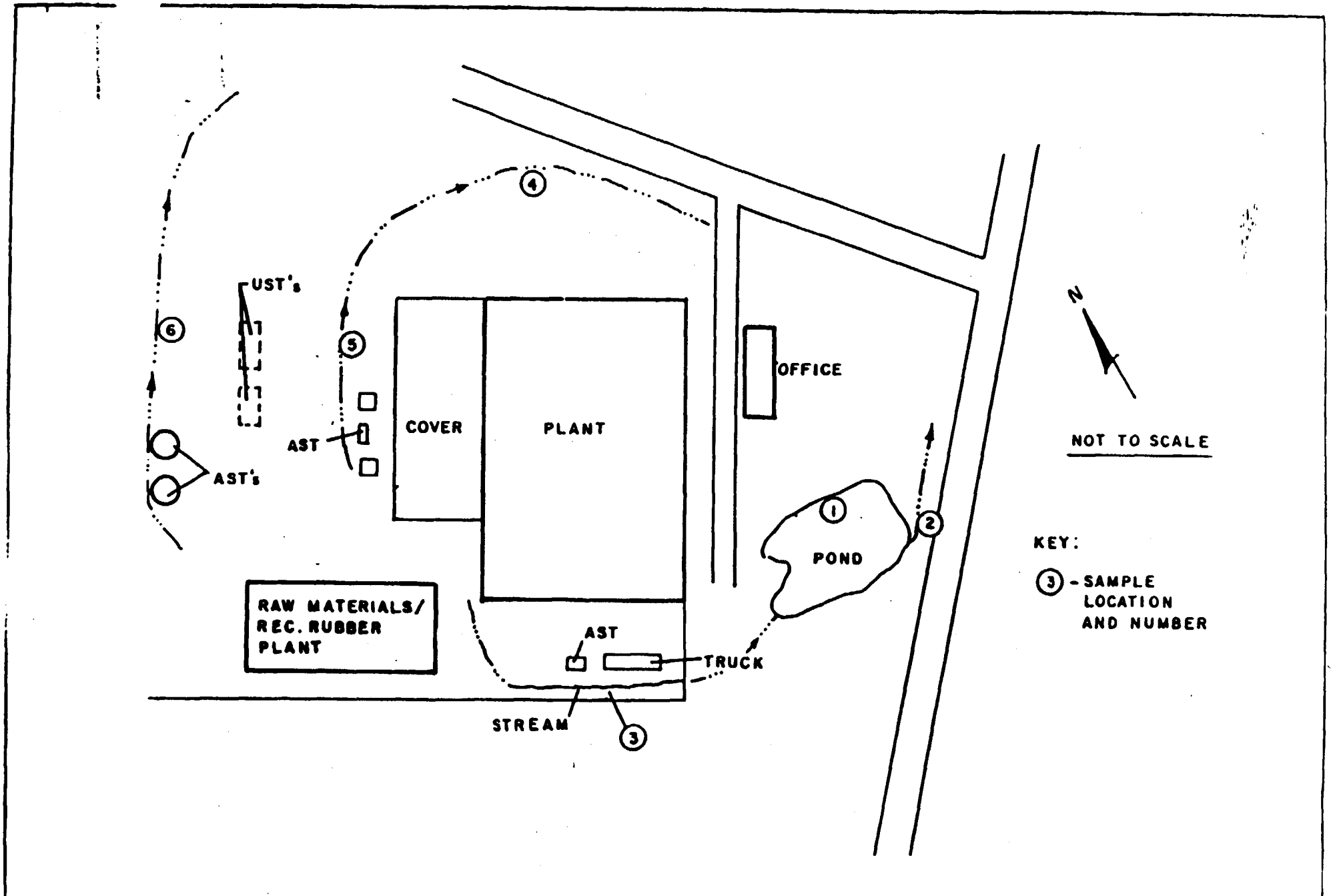
Sample #	TPHC (ppm)
7519-5	3,030
7519-6	860

The TPHC analysis is performed using an Infrared Spectrophotometer which measures the carbon carbon double bond stretch. This analysis picks up gasoline, diesel, oils, lubricants, and greases.

The GEPD has no set standards for action level regarding soils contaminated by hydrocarbons. As a general rule the GEPD allows TPHC values of less than 100 ppm. TPHC values above 100 ppm are taken on a case by case basis, with major factors in any decisions regarding action being the proximity of contamination to ground water and threats to drinking water sources.

Note that at this site, the TPHC documents surface soil contamination (to 6 inches depth). Soils below this level were not sampled.

Four surface water samples were recovered from the pond (Sample 7519-1) located on the southeast portion of the site along with the effluent (Sample 7519-2) and influent (Sample 7519-3) streams to the pond. A water sample (#7519-4) was retrieved from stagnant water in a drainage ditch on the northeastern portion of the site. See Figure 5.1 for sample locations.



PROJECT KEARNEY-NATIONAL
PROJECT No. 7519
LOCATION WARRENTON, GA.

Figure 5.1. Sampling Locations.

OHM
The Environmental Services Company

The surface water samples were tested for the compounds of fuels/oils (benzene, toluene, ethylbenzene and xylenes "BTEX"). The following summarizes the analytical results:

Sample #	Total BTEX (ppb)
7519-1	< 20
7519-2	< 20
7519-3	< 20
7519-4	< 20

6.0 ENVIRONMENTAL SETTING

The following sections describe the environmental setting of the Warrenton, Georgia, site.

6.1 GEOLOGY

The site is situated west of Augusta, Georgia, within the Southern Piedmont physiographic province. Generally the surface soils in this region are referred to as "saprolite"--clay-rich, thoroughly decomposed rock formed in place by chemical weathering of igneous or metamorphic rocks. At the site, the unnamed undifferentiated granite and granitic gneisses in the area have been weathered to form the local saprolitic soils. Depth to the unweathered "parent" rock is unknown.

6.2 HYDROGEOLOGY

Ground water in the near surface occurs under unconfined aquifer conditions. The soils on site have generally low permeabilities and thus low well yields. High permeabilities and large well yields of 25 to 200 gallons per minute are available from wells penetrating fault zones and zones of fracture concentrations in the underlying crystalline rock (Cressler et.al., 1979) at depths of 50 to 300 feet. The depth to ground water and ground-water flow direction are not known at this site. Local ground water can be inferred to flow in a southeasterly direction based on topography.

6.3 WATER USAGE

Local water is supplied by the City of Warrenton and no water wells are located on the property. No water wells used for drinking were found in the immediate vicinity (within 0.25 mile) surrounding the property.

7.0 SITE CONDITIONS

The sections following provide an account of OHM's findings during this assessment.

Highway 16 is situated to the southeast and connected to the property via an approximately 1/4-mile road along the northeastern boundary of the site. The buildings on this property are comprised of a warehouse-style factory building and a smaller, cinder block rubber recycling building. There are loading docks on the north side of the larger building for warehouse access, and a gravel parking area to the front.

7.1 PROPERTY USE

The production facility was constructed in 1974 and henceforth used by Warrenton Rubber for the production of inner tubes and related products. Interviews indicate that production has existed in its present form since 1974.

The manufacturing processes at this site may be described as follows:

- The principal raw materials in the process are synthetic rubber, recycled rubber, and processing chemicals. These components are fed to a large mix tank, at which point carbon black, a processing oil, and heat are added to form this plant's raw product. This entire operation takes place in the process building.
- Raw product is taken from the process building to the main production building (labeled on Figure 3.2 as the Main Plant).
- In the Main Plant, the raw product is heated, formed, and cut to strips which are thence hollowed as the inner tubes.
- Following the hollowing process, the still-hot inner tubes are contact cooled in a water trough supplied by water from the pond. This water is continually recycled from trough to pond.
- Following cooling, the tubes are immersed in a water/talc bath, coating the tubes with talc (a clay mineral), used to prevent the tubes from sticking to each other.

- The long tubes are then cut to the desired length, taken to circular forms, sealed as circular tubes, and the valve stems placed. At this same station, the tubes are test inflated, deflated, and thence sent for stacking and shipment.

As may be seen from the foregoing, the principal use of chemicals and potentially hazardous constituents occurs in the process building, at which point the raw materials for this manufacturing are developed.

Inner tube production processes on site include use of the following chemicals stored on site:

Royalene EPDM	Toluene
Butyl	Naphtha
Exxon N-650	Nuto H-66
Process Oil	Benzothiazyl Disulfide
Ronex MP	Sulphur
Zinc Oxide	Talc

No material safety data sheets (MSDS) were available.

7.1.1 Aboveground Storage Tanks

During OHM's site visit, several areas of concern were noted. Two large vertical aboveground storage tanks (ASTs) were noted along the northwestern boundary of the site (see Photo 4). These tanks show significant amounts of spillage, most likely the result of overfilling or otherwise poor housekeeping in oil transferals. A soil sample (No. 7519-6) was retrieved from the drainage ditch downgradient of these ASTs and analyzed for Total Petroleum Hydrocarbons (TPHC). The results indicate 860 ppm TPHC in these soils.

One AST and a small building which appeared to contain flammable liquids were located on the northwest side of the main facility (see Photo 3). The AST reportedly contained gasoline. Fifty-five gallon drums in the small building were labeled as "Nuto H-66", "Naptha" and "Toluene". OHM observed black staining surrounding this tank and building, presumably the result of poor housekeeping. A soil sample (No. 7519-5) was retrieved from the drainage ditch downgradient of this area and analyzed for TPHC. In addition, a water sample (No. 7519-4) was retrieved from a stagnant pool downstream of the aforementioned area and analyzed for Total BTEX, common components of gasoline.

Two horizontal ASTs are located along the southwest boundary of the site (see Photo 6) were reported to contain a light-weight production oil. Visual oil staining due to spillage was evident, presumably the result of overfilling or

poor housekeeping. No visual leaks were observed. A stream flows past these ASTs from the effluent of a rubber cooling process into a pond in front of the facility. Water samples were retrieved from the effluent of the pond, the pond itself, and the pond influent (see Photo 7) (sample Nos. 7519-1, -2 and -3) and analyzed for total BTEX.

Oil staining and water sheens were evident along with three 55-gallon drums off the east corner of the reprocessing building (see Photo 8).

7.1.2 Underground Storage Tanks

OHM also observed two underground storage tanks (USTs) (see Photo 5). No leakage could be documented within the scope of this project; however, some surface spillage was noted. The USTs were reported to be 15 years old and may be assumed to be of painted steel construction. The size of the tanks are unknown.

7.1.3 Worker Health and Safety

David E. Jacobs of the Georgia Institute of Technology has completed an Industrial Hygiene Consultation Report which is provided as Appendix C.

As was noted previously, the rubber plant does not maintain MSDS for hazardous materials which are used on site. Concern for worker health and safety, and worker right-to-know is apparently non-existent.

7.2 SURROUNDING PROPERTY USE

The surrounding area was used primarily in a rural and industrial capacity.

To the north along Highway 16, there is a baby clothing manufacturing facility and to the rear is an approximately 1/2-acre industrial building which was vacant at the time of this study. The EPA has no Notice of Violations (NOVs) on record for this facility or other nearby properties.

8.0 SUMMARY AND RECOMMENDATIONS

8.1 SUMMARY OF FINDINGS

OHM's inspection and evaluation of this site indicates the following:

- Five ASTs and two USTs, along with several 55-gallon drums on site, show evidence of spillage.
- Poor housekeeping has led to the development of several areas of hydrocarbon contamination to soils.
- The relatively extensive hydrocarbon contamination to soils, suggestive of careless disposal/spillage of process materials, also raises the concern that this spillage/ uncontrolled disposal may have been sufficient to develop ground-water contamination in the area.
- OHM's sampling and analysis of surface waters from the pond suggested that these waters are relatively clean. However, as was documented by photograph, OHM observed a sheen of hydrocarbons on portions of this pond, suggesting that these waters are periodically contaminated with hydrocarbons. As is evidenced by the lack of MSDS on site, there is no apparent concern by current operators of the site for worker health and safety and worker Right-to-Know considerations.
- The ASTs have no provisions for containment of any spillage.

In summary, this inspection and evaluation indicates that the current operators of the facility have little or no concern for environmental or worker health and safety matters. Moreover, as is substantiated by our analytical work, there is clear evidence of contaminated soils on site, and reason to believe that ground water may be, or is threatened to be, contaminated.

8.2 RECOMMENDATIONS

The following summarize our recommendations for further action.

8.2.1 Phase II Studies

Further evaluations would be required to determine in detail the vertical and horizontal extent of hydrocarbon contamination to the soils and ground water.

This work should include, at a minimum, the following:

- Additional soil sampling in the identified spill areas to identify the vertical and horizontal extent of hydrocarbon contamination to soils
- The installation of ground-water monitoring wells in the areas of apparent hydrocarbon contamination to soils to ascertain the impact to ground water

These evaluations should be of sufficient detail to identify not only the extent of soils and any ground-water contamination, but also sufficient to identify the scope of any associated remedial costs.

8.2.2 Contaminated Soil Removal

Soils contaminated with oil should be excavated and properly disposed to prevent the further spread of hydrocarbon contamination. The soils should be removed until only visually "clean" soils remain and these "clean" soils should be sampled to verify TPHC levels below the State of Georgia action level of 100 ppm. It is estimated with these limited data that 850 cubic yards of soil will need to be removed. These soils should be acceptable for disposal at an industrial landfill; however, further analytical sampling will be required prior to acceptance. Assuming the soils can go to an industrial landfill, OHM estimates the soils can be removed and disposed of for a ROM cost of $60 to $100 per cubic yard with a minimum of 100 cubic yards. Note the cost per yard will vary with the number of yards removed.

This removal should be in accordance with industry practice. During removal of the soil, the operation should be inspected by an environmental professional and well documented to include the presence of any oil-contaminated soils in the ground around the area, and verification of levels below 100 ppm.

8.2.3 Ground-Water Remediation

As no ground water was sampled under the scope of this phase environmental assessment, ground-water contamination and associated costs can only be speculated.

8.2.4 Containment at the ASTs

In addition, a concrete diked structure should be constructed at each of the 3 AST locations as a safety precaution for future leaks or spills.

8.2.5 Worker Health and Safety

As was noted above, our investigation indicates that the plant does not comply with any of the criteria of the Hazard Communication Standard of 29 CFR 1910.1200. The firm is liable for fines of up to $10,000 for willful negligence of this standard.

8.2.6 Underground Storage Tanks

No leak testing data was available for the USTs. Potential purchasers should require that the tanks be leak tested. Additionally, purchasers should consider the following with regard to these 15 year old tanks.

8.2.6.1 Risk of Leakage in Aging Tanks

As has been noted above, the materials of construction of these tanks are unknown. However, in consideration of their age, it is likely that these tanks are of steel construction and perhaps painted to improve corrosion resistance.

Corrosion in steel tanks is a complex but well-documented phenomenon which is a function of the materials of construction of the tanks, ground water or sources of water around the tanks, and the soil materials in which the tanks are imbedded. The principal modes of failure (that is, the development of leaks) in steel tanks are external corrosion and internal corrosion, respectively. External corrosion is largely the result of galvanic action developed from contact of the metal surface with soils, while internal corrosion occurs in a similar fashion, but with the galvanic action resulting from dissimilar metal surfaces in the tank being linked electrically by water. This condition may arise as a result of damage to the internal tank from gauge stick impact or the scrubbing action resulting from incoming product, both creating a clean metal area under a fill tube which is dissimilar from the other metal in the tank.

OHM has completed risk-based studies for others in this area, establishing that tanks founded in soils similar to those of this region have a high likelihood of developing corrosion after a period of about 13 years. Studies by others have established that, in the south, the average age at which tanks develop leaks due to internal corrosion is about 14 to 15 years.

Both external and internal corrosion may be inhibited by design protection. For example, cathodic protection (which we do not know to be in place or not in place at this site) will protect against external corrosion. Similarly, external corrosion may be inhibited by a choice of tank backfill; that is, the placement of more inert soils (characteristically quartz sands) around the tank rather than replacement of the saprolitic soils around the tanks following placement. Internal corrosion can be ameliorated by installing splash plates or internal lining. We do not know if these protections are in place in these tanks.

In summary, purchasers should recognize that these tanks are of indeterminate age, materials construction, and size. However, the best information available at this time suggests that they are likely 15 years in age or older and of steel construction. In consideration of their age and materials construction, potential purchasers should plan that, without replacement in the next several years, these tanks do have a reasonable potential for developing leaks. As a result of today's regulatory environment, the cost of cleanup of ground water and soil contamination may be very, very high. We believe that the average ground water and soil remediation of spilled petroleum products today costs in the range of $150,000 to $300,000.

8.2.6.2 Regulatory Considerations for Aging Tanks

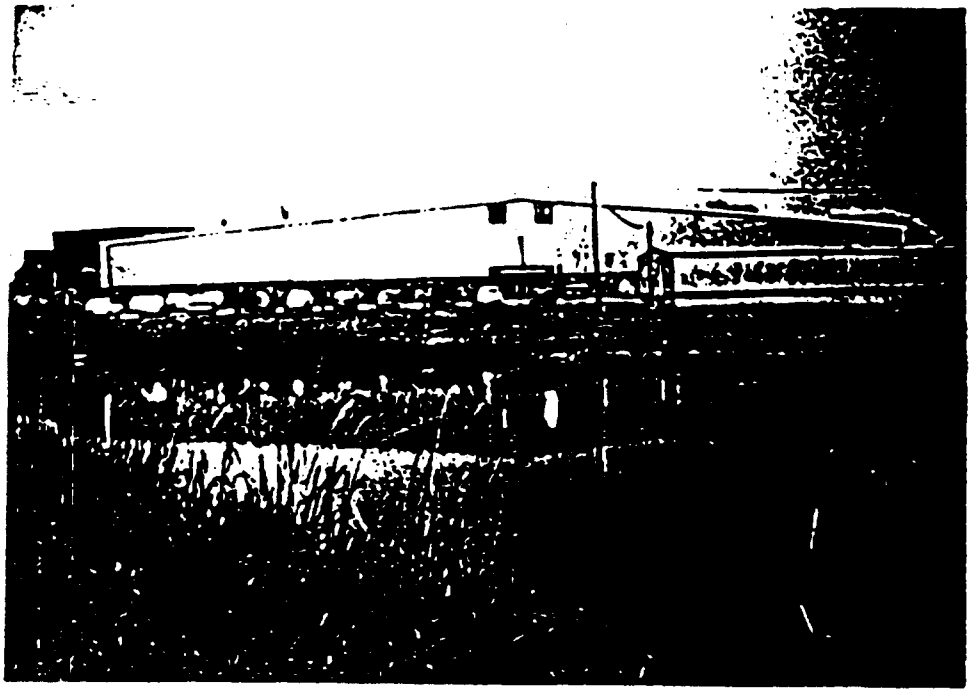
In September 1988, the EPA published a series of new technical rules for UST systems, which became effective in December 1988. If an owner or operator of USTs cannot comply with these regulations, the tanks may have to be closed. These regulations affect new and existing tanks as to:

- Performance standards for corrosion protection, spill and overflow protection and installation
- Leak detection
- Closure
- Release reporting and cleanup
- Financial responsibility

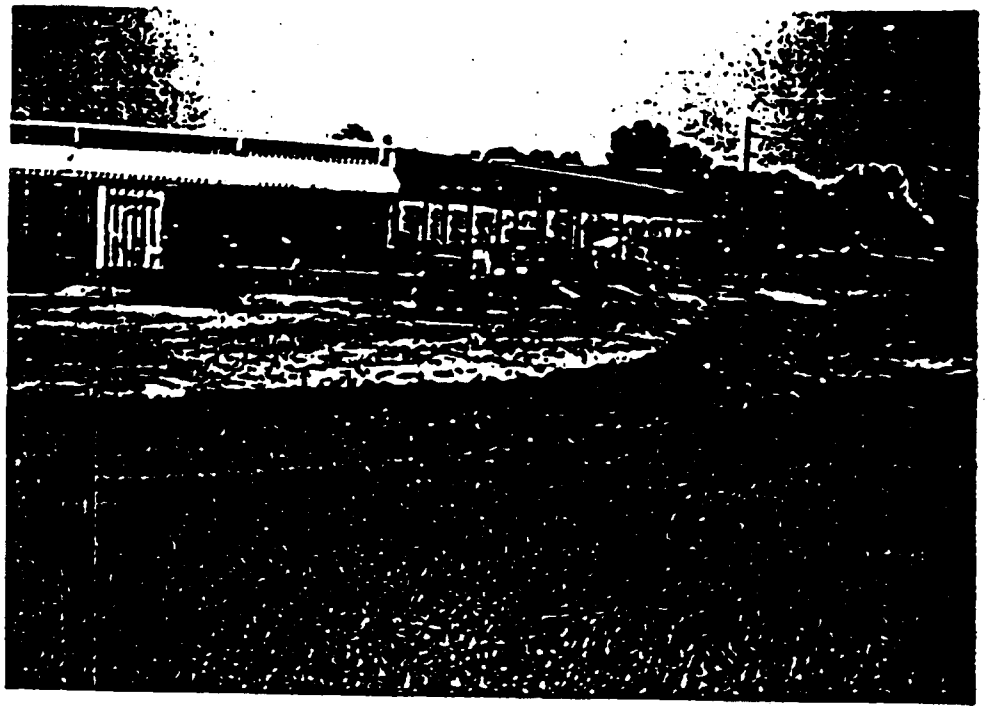
Potential purchasers of this site should consider that likely the most significant impact of these regulations will be requirements for the installation of devices to protect releases from the USTs and piping systems. This tankage will likely have to have release detection by December 1991 and the piping will likely have to have release detection by December 1990. By December 1998, existing UST systems must be upgraded to the standards of new systems.

We encourage potential purchasers of this site to discuss these regulatory considerations with your attorneys.

PHOTOGRAPHS



Photograph 1. Site as Viewed from Southeast.

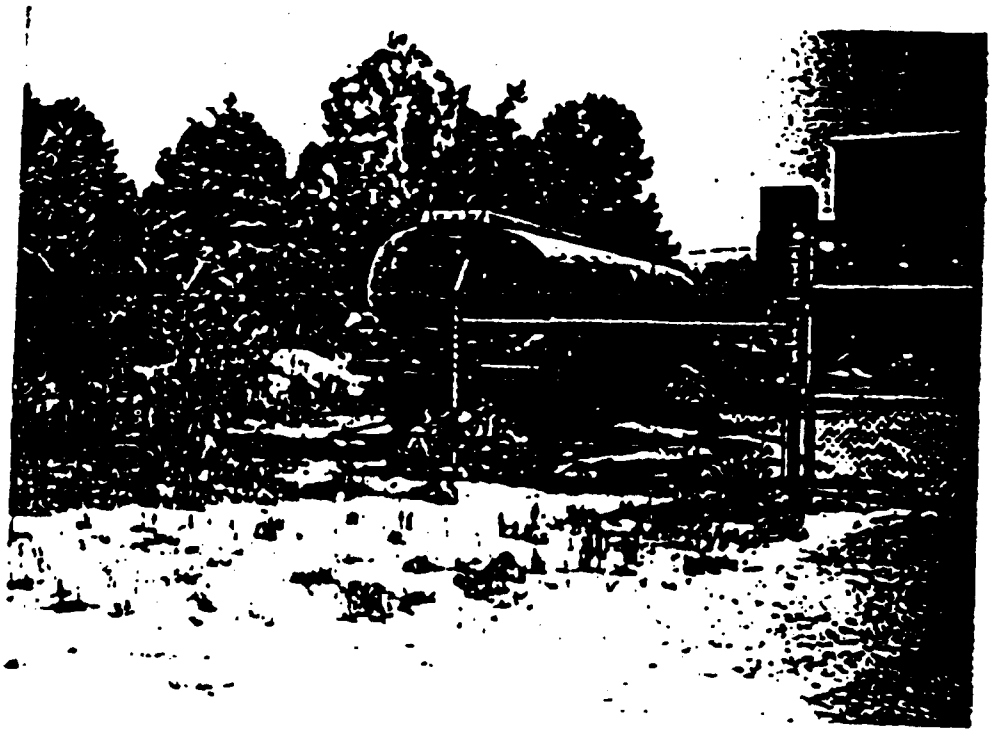


Photograph 2. Rear of Site as Viewed from Northeast.

Photograph 3. AST Reported to Contain Gasoline. Building Shown is Marked Flamable as are Associated Drums.

Photograph 4. Two AST's Reported to Contain Processing Oil and Associated Soils.

Photograph 5. Vent Pipes and Pump to UST's.



Photograph 6. Two AST's (Tanker Trailer and AST Behind it) Reported to Contain Processing Oil.

Photograph 7. Influent Streat to Pond showing Oil Contamination from AST's.

Photograph 8. View of Drums and Oil Contaminated Soil and Water off Southeast Corner of Reprocessing Building

APPENDICES A THROUGH C

PHASE II
SOILS ASSESSMENT OF
WARRENTON RUBBER PLANT
WARRENTON, GEORGIA

Prepared for:

Kearney - National, Inc.
H. Derrick Peterson
1015 Fifteenth Street NW
Washington, DC 20005

May 24, 1990

Project #8737

APPENDIX A

ENVIRONMENTAL ASSESSMENT OF THE WARRENTON RUBBER PLANT

July 24, 1989

July 24, 1989

Kearney-National, Inc.
c/o H. Derrick Peterson
Bryan, Cave, McPheeters and McRoberts
1015 15th Street, N.W.
Washington, DC 20005-2689

Dear Mr. Peterson:

RE: Report of Environmental Assessment; Warrenton Rubber Plant, Warrenton, Georgia

Please find enclosed three (3) copies of the above referenced report. It has been a pleasure working with Bryan, Cave, McPheeters and McRoberts on this project and OHM would welcome the opportunity to serve you again. Should you have any questions, please do not hesitate to call either myself or John O'Brien at 404-641-1066.

Sincerely,

Patrick M. Gagen
Hydrogeologist

PMG:js

ENVIRONMENTAL ASSESSMENT OF THE WARRENTON RUBBER PLANT IN WARRENTON, GEORGIA

Submitted to:

Kearney-National, Inc.
c/o Bryan, Cave, McPheeters and McRoberts
Washington, DC

O.H. Materials Corp.

Patrick M. Gagen
Hydrogeologist

John F. O'Brien, P.E.
Georgia Registration No. 12044, Exp. 12/31/90

July 24, 1989
Project 7519

Our evaluation of site conditions was based upon data and pertinent project information provided by the client, together with a visual exploration of the site and the field work described in this report. Using our professional judgement and experience, we analyzed all data and information compiled to prepare the site assessment.

OHM shall not be responsible or liable for results which are founded upon information or data which: (a) was not provided by Kearney-National, Inc.; or (b) was not attainable as delineated by the scope of work.

ENGINEER'S TOXIC AND HAZARDOUS SUBSTANCE
LETTER OF OPINION

The undersigned has provided to and for the benefit of KEARNEY-NATIONAL, INC. an investigation for the existence of toxic and hazardous substances, as outlined in the attached report dated, July 24, 1989.

It is the opinion of the undersigned that the investigation is a reasonable inquiry based on the standards of professionals engaged in similar investigations and the locality of the project. Based upon our investigation and resulting environmental survey report which is attached and incorporated herein, we have no reason to believe that hazardous or toxic substances are indicated on the subject property, except as are described specifically in the attached report.

This twenty-fourth day of July, 1989.

BY: _____

Name: John F. O'Brien
Title: Manager
Southern Region Technical Center
Georgia Registered Engineer
No. 12044 Exp. 12/31/90

APPENDIX A

INTERVIEWS

ENVIRONMENTAL, HEALTH, AND SAFETY MATTERS
RELATING TO PROJECT

SITE VISIT PROTOCOL

A. COMPANY STRUCTURE AND NATURE OF SITE

1. What is the nature of the facility's business?

   Production of inner tubes

2. What is the company's interest in the facility (e.g., owner, operator, lessee, lessor)?

   Operator

3. Are there any other operators at the site? If so, what is the nature of their relationship (e.g., subtenant) and the nature of their operations?

   No

4. Who were the prior owners/operators/lessees of the facility? How was the facility used?

   January 1, 1981 Nearney-National, Inc.

5. Were the facility operations ever located at another site?

   No

6. Is the facility owned, operated or used by the company in compliance with applicable zoning and similar local requirements?

   No

7. Has the facility applied for any change in zoning, variance or similar authorization? Is such an application necessary in order to continue the operation of the facility?

   No

8. Is the facility aware of any changes in zoning requirements or similar local requirements which may affect the facility?

   No

9. Are there any geological or hydrogeological studies available for the facility?

   Georgia Tech performed an Industrial Hygiene Consultation Report in June, 1984

10. How good are the facility's relations with the surrounding community? For example, have there been complaints regarding odors, noise, truck traffic, etc.?

    No

11. What correspondence and other communication has the company had with the local public and local authorities with respect to the facility?

    No

B. CLAIMS AND PROCEEDINGS

The following questions pertain to any environmental, health or safety law or regulation which may be applicable to the facility, including any federal, state or local requirement. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Is the company a party to any pending lawsuit or administrative proceeding?

   No

2. Has the company been notified of any threatened or intended lawsuit or administrative proceeding to which it may be made a party?

   No

3. Has the company been identified as a potentially responsible party under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) in connection with the release or threatened release of a hazardous substance?

   No

4. Has the company been a party to any environmental or workman's compensation lawsuit or administrative proceeding concluded within the last ten years?

   Workman's Comp., Approx. $90,000; negligence on worker's part

5. Is the company aware of any claim that a chemical substance used by it in its manufacturing process, or present in its products, creates a risk to human health (specifically including, but not limited to, a risk of causing cancer)?

No

6. Is the company subject to any consent decree, administrative order or compliance schedule or to any agreement or informal understanding with any governmental authority?

No

7. Is the company the subject of any threatened or pending governmental investigation regarding environmental or worker health and safety related matters?

No

8. Has the company received any citations, notices of violation, warnings or complaints from any governmental authority or citizen suit notices or complaints from third parties?

No

9. Have there been any complaints to any governmental authority or to any other party, including the company, from any private party, including adjacent landowners, regarding any site or facility owned, operated or used by the company?

No

10. Has the company reported any violations of a law, regulation or permit to any governmental authority?

No

11. Does the company know of any such violations which have not been reported to a governmental authority?

No

12. Does the company know or believe that circumstances exist which could result in claims being asserted against it?

No

13. Does the company know of any requirement or anticipated requirement with which it is or may be unable to comply or which may require an expenditure in excess of $10,000 to achieve compliance with or which will affect the usefulness of the company's facilities to produce, market and sell products currently produced at the facilities?

    No

14. Is the company ineligible for government contracts because of non-compliance with an environmental requirement or has it been threatened with the loss of such eligibility?

    No

C. AIR POLLUTION REQUIREMENTS

The following questions pertain to air pollution control requirements which may be applicable to the facility arising under the Clean Air Act or other federal, state, or local law or regulation. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Does the facility have any sources of air emissions, including fugitive emissions?

   Yes. Dust collector for carbon black.

2. Can the facility identify the pollutants known or suspected to be emitted from each source?

   Yes

3. Is there any emissions monitoring data or emissions calculations?

   No

4. Does the facility have the controls needed to achieve all applicable air pollution requirements?

   Yes. Filters.

5. Does the facility have any environmental emissions permits or other governmental authorizations?

   No

6. Does the facility have any pending applications for emissions permits or other governmental authorizations?

   No

7. Does the facility have all permits and other governmental authorizations required to operate its business for the next three years?

   Yes

8. Has any application for a permit or other governmental authorization been denied or withdrawn within the last ten years?

   No

9. Is the facility operating under or is it requesting any relief from any requirement (e.g., any waivers, modifications, variances, exemptions, extensions, delayed compliance orders)? Is there any need for such relief?

   No

D. WATER POLLUTION REQUIREMENTS

The following questions pertain to water pollution requirements which may be applicable to the facility under the Federal Water Pollution Control Act; Rivers and Harbors Act; Marine Protection, Research and Sanctuaries Act; Coastal Zone Management Act or other federal, state or local laws or regulations. If any questions is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Does the facility have any wastewater discharges (including any stormwater runoff or seepage) from its premises? Are there any floor drains at the facility?

   City Sewer. Yes, they drain into pond.

2. Can the facility identify the pollutants known or suspected to be present in each discharge and where such discharge goes? Is there any effluent monitoring data?

   No

3. Does the facility have the controls needed to achieve all applicable water pollution requirements, including any applicable pre-treatment requirements by a local POTW ("Publicly Owned Treatment Works")?

   No

4. Does the facility have any structures located in any waterway, flood plain, or coastal or wetlands area or other such specially-designated area?

   No

5. Has the facility done any work or placed dredged or fill material in any waterway or wetlands area?

   No

6. Does the facility have any permits or other governmental authorizations?

   No

7. Does the facility have any pending applications for permits or other governmental authorizations?

   No

8. Does the facility have all permits and other governmental authorizations required to operate its business for the next three years?

   No

9. Has any application for a permit or other governmental authorization been denied or withdrawn within the last ten years?

   No

10. Is the facility operating under or is it requesting any relief from any requirement, (e.g., any answers, modifications, variances, exemptions, extensions, delayed compliance orders)? Is there any need for such relief?

    No

11. Has the facility had any spills of oil or hazardous substances (within the meaning of the Federal Water Pollution Control Act) into any waterway or wetlands area?

    No

12. Does the facility have an SPCC (Spill Prevention Control and Countermeasure) plan for each site where oil is handled?

    No, not deemed necessary.

E. HAZARDOUS AND SOLID WASTE REQUIREMENTS

The following questions pertain to hazardous waste[1] and solid waste[2] management requirements which may be applicable to the facility arising under the Resource Conservation and Recovery Act; Comprehensive Environmental Response, Compensation and Liability Act; Safe Drinking Water Act, or other federal, state or local laws or regulations. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Have any hazardous or solid wastes been disposed of on any property currently or previously owned or leased by the facility by any person or at any time?

   No

2. Does the facility have records of the location, quantity and chemical composition of all wastes disposed of on its property?

   No

3. Since the commencement of its business, has the facility arranged for the transportation, treatment or disposal of any hazardous wastes or solid wastes on any property which it does not currently own?

   No

4. Does the company have records of the location, quantity and chemical composition of all hazardous wastes disposed of by or for the facility on property which it does not now own?

   No

---

[1]For purposes of this protocol, "hazardous waste" means any solid, semi-solid, or liquid waste material which is ignitable, corrosive, reactive, toxic, radioactive, infectious or etiological, including any hazardous waste within the meaning of the Resource Conservation and Recovery Act or any hazardous substance within the meaning of the Comprehensive Environmental Response, Compensation and Liability Act.

[2]For purposes of this protocol, "solid waste" means any solid, semi-solid, or liquid waste material other than a "hazardous waste."

5. Other than waste disposal areas, does the facility contain or may it be contaminated by hazardous wastes or solid wastes which it generated or otherwise handled?

   No

6. Does the facility know of any releases or threatened releases into the environment of its hazardous or solid wastes, from any source?

   No

7. Does the facility know of any investigations or inquiries relating to its hazardous wastes or solid wastes or the disposal of such wastes?

   No

8. Has the facility filed with governmental authorities any notices of hazardous waste activity or notices of the location of facilities where hazardous substances (within the meaning of the Comprehensive Environmental Response, Compensation and Liability Act) were stored, treated or disposed?

   No

9. Has the facility filed with governmental authorities any and all required notices regarding the existence of any solid waste management unit, including any underground storage tank, on its property?

   No. 15 year old USTs

10. Can the facility identify the source, quantity and chemical composition of the wastes which it now is generating or otherwise handling?

    Yes

11. Has the facility attempted to adopt any waste minimization programs in any of its operations?

    Yes. Recycle rubber and carbon black.

12. Does the facility have the controls needed to achieve all applicable waste management requirements?

    Yes

13. Is the facility a generator of hazardous wastes? Generator I.D. number? Small quantity generator?

    No

14. Does the facility have any permits or other governmental authorizations, including interim status and identification numbers?

No

15. Does the facility have any pending applications for permits or other governmental authorizations?

No

16. Does the facility have all permits and other governmental authorizations required to operate its business for the next three years?

Yes

17. Has any application made by the facility for a permit or other governmental authorization been denied or withdrawn within the last ten years?

No

18. Is the facility operating pursuant to or requesting any relief from any requirement (e.g., any waivers, modifications, variances, exemptions, extensions, delayed compliance orders)? Is there any need for such relief?

No

19. What operations at the facility generate wastes?

None

20. What quantities of waste are produced and what is their chemical composition?

None

21. Are hazardous wastes stored at the property in compliance with RCRA, including waste segregation, no-smoking and warning signs, contingency plans, aisle space, labeled with accumulation dates, etc.?

No

22. Has the facility entered into any contracts regarding the disposal or other handling of solid or hazardous wastes?

No

23. Are any of the facility's solid or hazardous wastes recycled, reclaimed or reused either by the company itself or by any other entity?

Yes; rubber and carbon black

24. Were any underground storage tanks located at the facility ever owned or leased by the company?

    Yes

25. Did the facility ever use underground tanks for the storage or disposal of any hazardous or solid wastes, products or any fuels?

    Fuels

26. Have any of the underground storage tanks been assessed by a professional engineer? Are any of the underground storage tanks equipped with leak detection equipment or secondary containment devices?

    No. No.

F. PRODUCTION, USE, OR EXISTENCE OF CHEMICALS

The following questions pertain to the requirements for the production or use of chemicals arising under the Toxic Substances Control Act ("TSCA"); or other federal, state or local law. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Is the facility aware of any PCBs in any quantity located on its property or contained in any of its transformers or capacitors?

   Approx. 15 year old transformers owned by Georgia Power

2. Is the facility aware of any asbestos in any quantity located on its property or contained in any construction materials, such as pipe or boiler insulation, floor tiles, ceiling tiles, mastic, roofing materials, wallboard, or texturing materials?

   No

3. Has the facility ever manufactured or used any radioactive materials?

   No

4. Is the company aware of any radon detected on its property or of radon deposits in the immediate area of its facility?

   No; no tests.

5. Does the facility have or anticipate having a testing program for health or environmental effects?

   No

6. Does the facility have any toxic data concerning its products, raw materials, or intermediates?

   Monthly safety meetings

G. HEALTH AND SAFETY REQUIREMENTS

The following questions pertain to health and safety requirements arising under the Safe Drinking Water Act, the Occupational Safety and Health Act, the Emergency Planning and Community Right-to-Know Act, and other federal, state or local laws and regulations. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Does the facility provide water for human consumption which is not taken from a public water works?

   No

2. Does the facility have any reports or logs of occupational injuries or illnesses sustained by its employees?

   Yes

3. Does the facility have any estimate or measurement of the occupational exposure (e.g., personal monitoring data) of its employees to any chemicals (such as those listed in 29 CFR §1910.1000 [Tables Z-1, Z-2 and Z-3]) or physical stresses such as noise or radiation?

   No

4. Has the facility used or is it currently using any OSHA-regulated carcinogens (29 CFR §1910.1001-1910.1045) such as asbestos, vinyl chloride, acrylonitrile, etc.?

   No

5. Has the facility instituted a hazard communications program under the Occupational Safety and Health Act?

   No

6. Does the facility maintain OSHA training records? Are MSDS's available to employees?

   No. No.

7. Are any of the facility's products or substances and mixtures used or produced at any of the company's facilities subject to any labeling or "right to know" laws and have any programs been established to comply with such laws?

   Yes; raw materials.

8. Does the facility expose its employees to noise levels exceeding OSHA standards? Are any hearing protection devices used for employees at the facility?

   No

9. Does the facility have the controls needed to achieve all applicable health and safety requirements?

   Yes

10. Is the facility operating under or is it requesting any relief from any requirement (e.g., waivers, modifications, variances, exemptions, extensions, delayed compliance orders)? Is there any need for such relief?

    No

11. Has the facility filed any emergency planning notifications?

    Yes

12. Has the facility prepared any annual chemical inventory forms?

    Yes

13. Has the facility filed any annual toxic chemical release forms?

    No

H. REPORTS

The following questions pertain to any substance manufactured or otherwise handled by the facility. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Does the facility have any material safety data sheets for its raw materials, intermediates and products?

   No

2. Has the facility conducted or participated in any health or environmental effects studies?

   No

3. Does the facility have any environmental impact statements or environmental assessments?

   No

4. Does the facility have any internal audit or inspection reports or risk analyses relating to environmental, health or safety matters?

   No

5. Does the facility have any inspection reports or risk analyses prepared by any governmental authority, insurance company or other person relating to environmental, health or safety matters?

   Yes; to insurance.

6. Has the facility reported any spills or other releases of oil or hazardous substances?

   No

7. Has the facility provided any medical program for employees? If so, have any medical concerns been found? Workers Compensation claims for EH&S Matters?

   No

8. What correspondence and other communication have there been between the facility and governmental agencies (OSHA, U.S. Environmental Protection Agency, etc.)?

   None

I. MISCELLANEOUS

1. What insurance or agreements of indemnification relating to environmental liability has the facility ever had or does it now have covering sites and facilities owned or operated by the company at any time?

   No

2. Is the facility obligated by reason of any purchase, indemnification or other agreement to defend, indemnify or otherwise hold harmless any other entity with respect to any environmental, health or safety claim or liability?

   No

3. Does the facility handle any radioactive materials?

   No

4. Has the facility ever been denied insurance?

   Yes; Workman's Compensation.

5. What notices or claims have been made by the facility or any other parties regarding insurance coverage of sites or facilities owned or operated by the company?

   Workman's Compensation

6. What contingency plans exist for handling emergency pollution incidents?

   None

7. Are there any requirements contained in permits or elsewhere which may impede or prohibit the transfer of the facility or permits?

   No

8. Does the facility subcontract with any entity for off-site manufacturing? What are the products manufactured off-site? What is known about the subcontractor's EH&S compliance?

   No

9. Are there any other material facts or matters of which the client should be aware?

   No

10. Identify all persons at the facility who might have information concerning any of the above questions?

    Frank Mills
    Lewis Newsom

APPENDIX B

ANALYTICAL RESULTS

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

For In-House Use

ABR

Client: O.H. Materials Corporation

(Invoice to) Same

Project: Warrenton Rubber

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Alec Hart

Sample: ___water ___soil ___tissue

Sampled by: Client

Other: see station

ABI Manager: Austin Raabe

Sample Taken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5233	89-950	56	7519-1	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	55		Xylene	<5 ppb
R5234	89-950	56	7519-2	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5235	89-950	56	7519-3	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5236	89-950	56	7519-4	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Aust Raabe

Dr. Austin Raabe
Director of Chemistry

APPLIED BIOLOGY, INC.

NVIRONMENTAL
HEALTH
PECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

For In-House Use

ABR

lient: O.H. Materials Corporation (Invoice to)

roject: Warrenton Rubber Same

ddress: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

ttention: Alec Hart

ample: ___water ___soil ___tissue Sampled by: Client

ther: see station ABI Manager: Austin Raabe

ample aken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

le umber	Lab Book Number	Page Number	Station	Test Required	Results
5233	89-950	56	7519-1	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
5234	89-950	56	7519-2	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
5235	89-950	56	7519-3	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
5236	89-950	56	7519-4	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
[illegible]	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Aust Raabe

Dr. Austin Raabe
Director of Chemistry

A P P L I E D B I O L O G Y, I N C.

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

For In-House Use

ABR

Client: O.H. Materials Corporation (Invoice to)

Project: Warrenton Rubber Same

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Alec Hart

Sample: ___water ___soil ___tissue Sampled by: Client

Other: see station ABI Manager: Austin Raabe

Sample Taken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5233	89-950	56	7519-1	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5234	89-950	56	7519-2	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5235	89-950	56	7519-3	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5236	89-950	56	7519-4	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Aust Raabe

Dr. Austin Raabe
Director of Chemistry

APPLIED BIOLOGY, INC.

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

For In-House Use

ABR

Client: O.H. Materials Corporation

(Invoice to) Same

Project: Warrenton Rubber

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Alec Hart

Sample: ___water ___soil ___tissue

Sampled by: Client

Other: see station

ABI Manager: Austin Raabe

Sample Taken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5233	89-950	56	7519-1	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5234	89-950	56	7519-2	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5235	89-950	56	7519-3	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5236	89-950	56	7519-4	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
R5238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Austin Raabe

Dr. Austin Raabe
Director of Chemistry

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

* For In-House Use *

ABI

Client: O.H. Materials Corporation

(Invoice to)

Same

Project: Warrenton Rubber

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Pat Gagan

Sample: ___water ___soil ___tissue

Sampled by: Client

Other: see station

ABI Manager: Austin Raabe

Sample Taken: 7/10/89

Sample Received: 7/10/89

Report Required: 7/20/89

Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5233	89-950	56	7519-1 (water)	Benzene	<5 ppb
	89-950	56		Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5234	89-950	56	7519-2 (water)	Benzene	<5 ppb
	89-950	56		Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5235	89-950	56	7519-3 (water)	Benzene	<5 ppb
	89-950	56		Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5236	89-950	56	7519-4 (water)	Benzene	<5 ppb
	89-950	56		Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
R5238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Austin Raabe

Dr. Austin Raabe
Director of Chemistry

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2988

P.O. No.:

Tel. No.: 641-1066

For In-House Use

AGR

Client: O.H. Materials Corporation

(Invoice to) Same

Project: J7522

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Pat Gagan

Sample: ___water _x_soil ___tissue

Sampled by: Client

Other: _____

ABI Manager: Austin Raabe

Sample Taken: 7/19/89 Sample Received: 7/19/89 Report Required: 7/21/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5332	89-950	88	7522-7	Benzene	<20 ppb
	89-950	88		Toluene	60 ppb
	89-950	88		Ethylbenzene	34 ppb
	89-950	88		Xylene	248 ppb

Austin Raabe

Dr. Austin Raabe
Director of Chemistry

APPENDIX C

INDUSTRIAL HYGIENE CONSULTATION REPORT

Ref. 19

6

Brian E. Bovard
3058 Paces Station Ridge
Atlanta, Georgia 30339

MEMORANDUM

TO: James C. Frenzel

FROM: Brian E. Bovard BEBovard

DATE: July 20, 1993

RE: E.H. Mann site: soil contamination areas (from OHM Phase II study) and probable product sources

The OHM study identified four (4) areas of soil contamination (see attached chart from the report).

Area 1: UST area

We know that at least one of the two UST's was used to store "Rubber Solvent," but it's not certain that the smaller tank held the same. If not, the second UST probably held heating oil or a process oil.

Product removed from the UST's was manually pumped into 55-gallon drums which were then taken to the mixing plant building. Any surface contamination in this area was likely the result of sloppy handling in loading or unloading product from the UST's.

Area 2: AST's/Process Oil

This is the largest area of surface contamination, which we know resulted from the approximate 2,000-2,500 gallon "over-fill" spill of the "100/100 Process Oil" back in 1985.

Area 3: Adjacent to covered work area behind main building

This is the general area where the "oil house;" the propane and gasoline AST's, and the vast majority of product drums were located.

The OHM soil samples showed no reportable levels of purgeable aromatics, which would seem to eliminate gasoline, toluene, or naphtha as the likely source. Lubricating oils could be a possible source, but I wouldn't rule out the drums that contained toluene, naphtha, or the mixed "value cement" completely.

I would speculate that sloppy handling of drum materials was the cause of any surface contamination.

Area 4: AST/Truck location

Supposedly the AST and truck (tanker) kept in this area were used to store #2 heating oil that was burned in the boiler inside the main plant building.

Again, I would speculate that any surface contamination in this area was the result of sloppy handling or leaking nozzles from the AST and/or the tanker.

NOTE: The OHM soil samples were tested for purgeable aromatics/purgeable hydrocarbons (EPA Test Method 8010/8020), and with but one exception, all compounds tested BDL (Below Detection Limit). That exception was a 0.564 ppm level of tetrachloroethylene in one sample, but the toxicity characteristic maximum concentration level is 0.7 ppm.

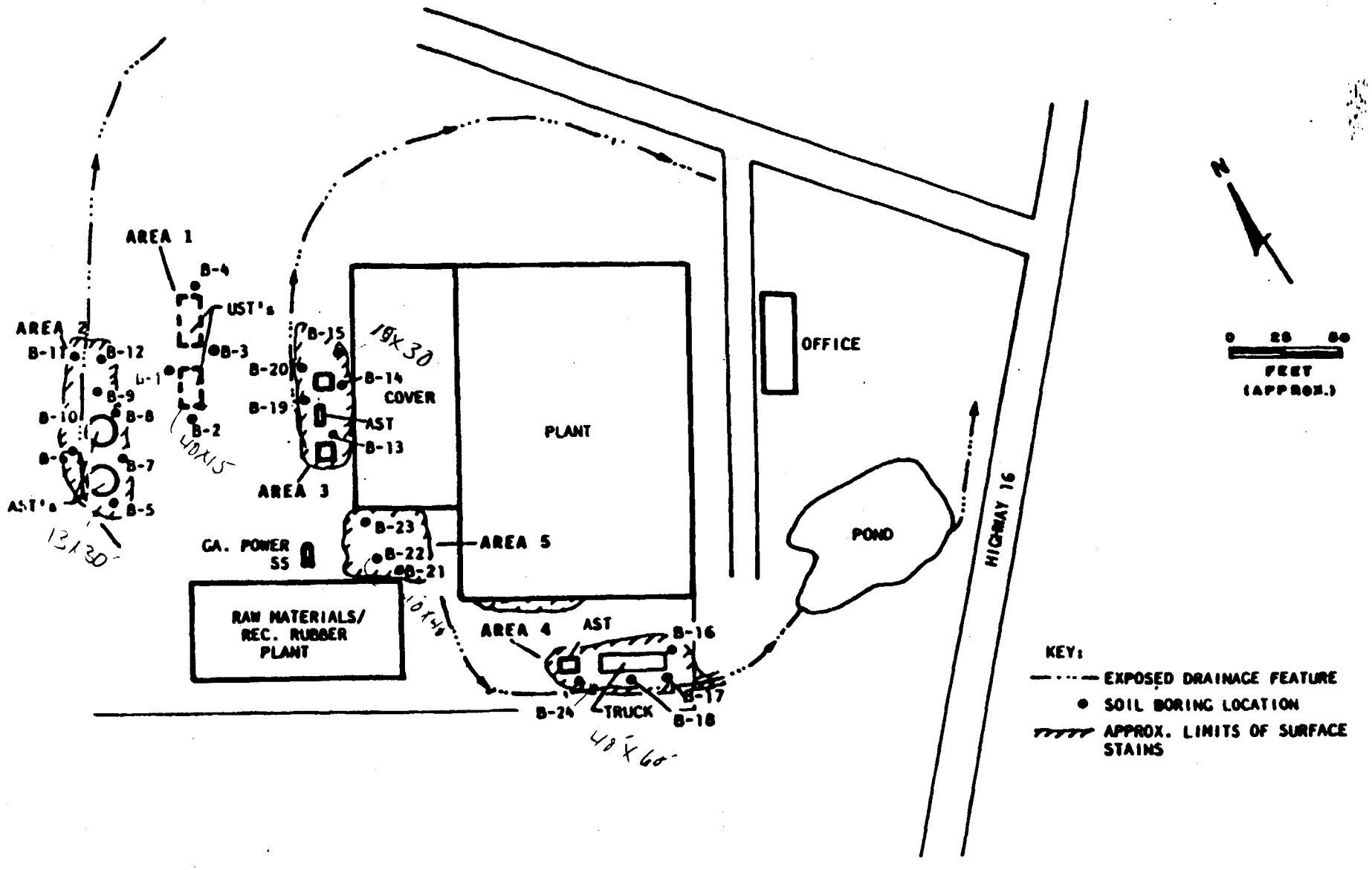
If gasoline, toluene, or naphtha were the sources of surface contamination, you'd expect them to show up in the 8010/8020 tests.

The contamination reported in the OHM study is all TPH related. Removing the 8010/8020 compounds from the list of candidates leaves basically the process oils, lubricating oils, and heating oil as the most likely sources of contamination.

BEB

BEB:dlr

02657\00001\dlr5101



PROJECT: INEY-NATIONAL

PROJECT No. 8737

FIGURE 1 Site Plan Showing Boring Locations and Surface

APPENDIX E

EPA POTENTIAL FOR HAZARDOUS WASTE SITE
PA FORM AND SCORE SHEET
FOR WARRENTON RUBBER COMPANY SITE

APPENDIX A

OMB Approval Number: 2050-0095
Approved for Use Through: 1/92

PA Scoresheets

Site Name: Warrenton Rubber Company

CERCLIS ID No.: GAD984321513

Street Address: 101 Flower St

City/State/Zip: Warrenton, GA

Investigator: Dan Heater / Madelene Kellam

Agency/Organization: GA EPD

Street Address: 205 Butler St.

City/State/Zip: Atlanta, GA 30334

Date:

GENERAL INFORMATION

Site Description and Operational History:

Warrenton Rubber Company Site consist of two buildings approximately 200 X 300 ft. (main structure) and 60 X 120 ft. The typical construction for the two buildings is structural steel and masonry. The buildings were used for storage/production activities. Rectangular in shape, the lot is set off Highway 16 and an access road serves to connect the property to the highway. The area behind the main structure consist of construction debris (dirt, cement blocks, wood, etc.). One of the underground storage tanks (UST) located behind the building has been removed and is stored in the construction debris area. The area associated with the secondary structure is stained with carbon black, a material used for the production of inner tubes and related products (Ref. 4 & 5).

Previous to Warrenton Rubber Company which closed in 1989, the facility was used for Retreaders Tire Supply Company (Ref. 7). E.H. Mann, doing business as Warrenton Rubber Company, filed for bankruptcy (US Bankruptcy Court for the Southern District of Georgia, Augusta Division, Chapter 7, Case No. 89-10699-JDS) (Ref. 8). A. Stephen Wallace, the Trustee in the bankruptcy for the Debtor, sold the property to D&H Rail Services in July of 1995 and is currently operating as Lee & D Contractors Inc., Transfer Station, a solid waste transfer station. The transfer station is operated by David Parham (Ref 4).

The production facility was constructed and used by Warrenton Rubber Company for the production of inner tubes and related products. Products used at the site that would constitute hazardous waste when disposed consist of any rubber solvent, toluene, and Surret Fluid 4K (heavy asphaltic based lubricant for wire ropes diluted with 1,1,1-trichloroethane) (Ref. 5). All potentially hazardous waste material have been removed from the site. The drum/product removal invoices indicate that 19 drums and an additional 1,950 gallons of bulked waste were disposed of by Alternative Energy Resources, Inc. between December 1993 and May 1994 (Ref. 9).

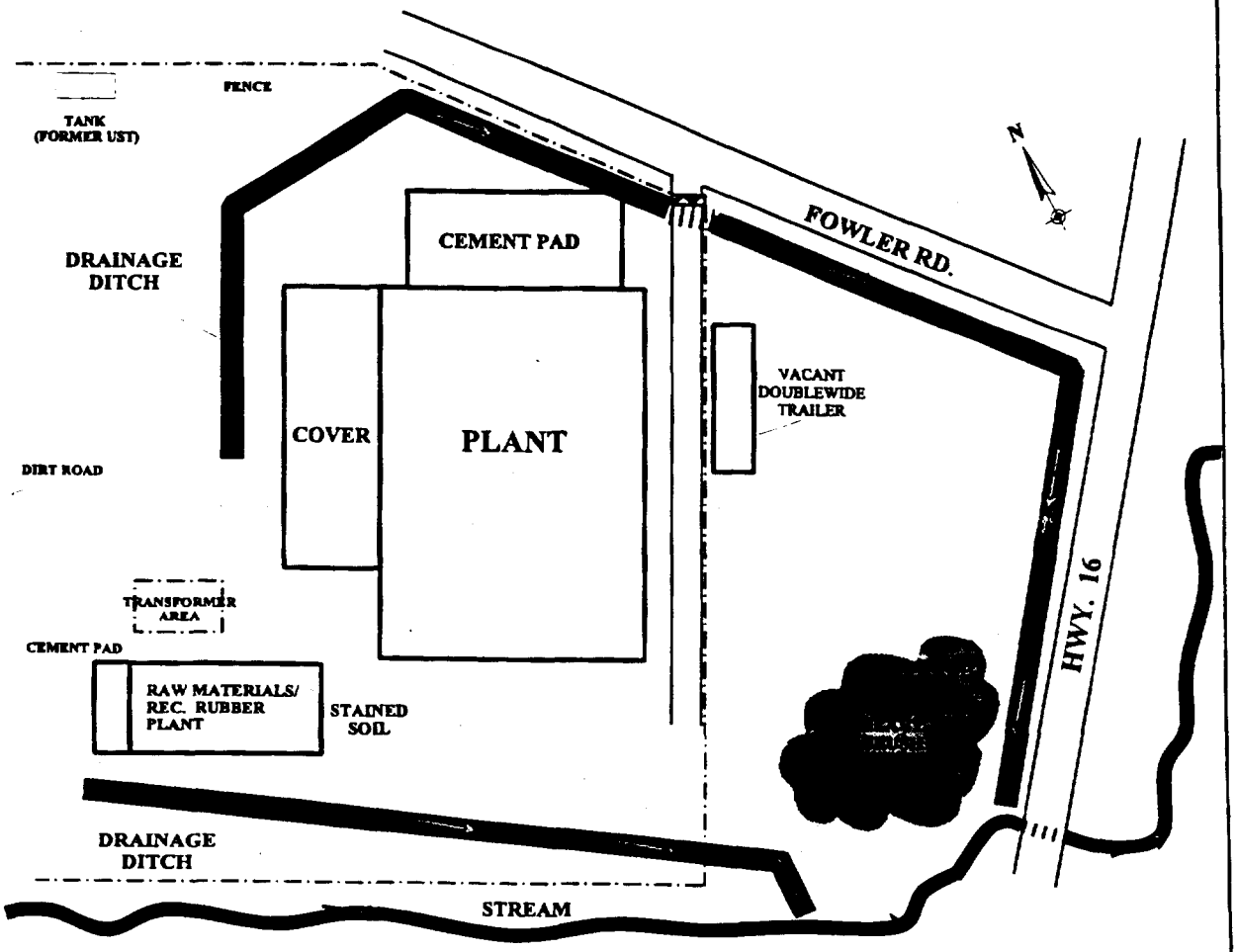
Probable Substances of Concern:
(Previous investigations, analytical data)

Previous investigations indicate four areas of concern for possible contamination. These areas are described a the UST area, AST's Process Oil area, Area adjacent to the cover work area behind the main building used to store product, and the AST and Tanker truck location (Ref. 15). During the Environmental Assessment of October 1993, these areas were sampled and analyzed for soil and groundwater. The sampling event indicated ranges of 25 to 130 ppm Total Petroleum Hydrocarbon (TPH) in the soil and Below Detection Limit to 0.5 parts per billion (ppb) of 1,1-Dichloroethane in the groundwater (Ref. 10). The U.S. Environmental Protection Agency Emergency Response and Removal Branch indicated that from their review of the available information presented, the site does not meet the criteria for removal eligibility (Ref. 9).

GENERAL INFORMATION (continued)

Site Sketch:
(Show all pertinent features, indicate sources and closest targets, indicate north)

NOT TO SCALE



SOURCE EVALUATION

Source No.: 1	Source Name: UST Area	Source Waste Quantity (WQ) Calculations:
Source Description: Underground Storage Tank (UST) location. At least one UST was used to store Rubber Solvent. One UST has been removed. The product has been removed from the USTs (Ref. 4 & 19).		Approximate Area: 40' X 15' = 600 sq-ft WC = 600/34000 = 0.01765 (Ref. 4 & 19)

Source No.: 2	Source Name: AST / Process Oil	Source Waste Quantity (WQ) Calculations:
Source Description: Above Ground Storage Tank (AST)/Process Oil - approximately 2000 - 25000 gallons of 100/100 Process Oil (Ref. #19).		Approximate Area: 15' X 30' = 450 sq-ft WC = 450/34000 = 0.01324 (Ref. 4 & 19)

Source No.: 3	Source Name: Adjacent to Covered Work Area.	Source Waste Quantity (WQ) Calculations:
Source Description: General area where the "oil house," the propane and gasoline AST's, and the vast majority of product drums were located (Ref. 19).		Approximate Area: 15' X 30' = 450 sq-ft WC = 450/34000 = 0.01324 (Ref. 4 & 19)

Site WC:

Continued on next Page.

SOURCE EVALUATION

Source No.: 4	Source Name: AST/Truck location	Source Waste Quantity (WQ) Calculations:
Source Description: AST and truck (tanker) kept in this area used to store #2 heating oil used in boiler for main plant building (Ref. 19).		Approximate Area: 40' X 60' = 2400 sq-ft WC = 2400/34000 = 0.07059 (Ref. 4 & 19)

Source No.:	Source Name:	Source Waste Quantity (WQ) Calculations:
Source Description:		

Source No.:	Source Name:	Source Waste Quantity (WQ) Calculations:
Source Description:		

Site WC: 18

PA TABLE 1: WASTE CHARACTERISTICS (WC) SCORES

PA Table 1a: WC Scores for Single Source Sites and Formulas for Multiple Source Sites

TIER	SOURCE TYPE	SINGLE SOURCE SITES (assigned WC scores)			MULTIPLE SOURCE SITES
		WC = 18	*WC = 32*	*WC = 100*	Formula for Assigning Source WQ Values
CONSTITUENT	N/A	≤100 lb	>100 to 10,000 lb	>10,000 lb	*lb ÷ 1*
WASTESTREAM	N/A	≤500,000 lb	>500,000 to 50 million lb	>50 million lb	*lb ÷ 5,000*
VOLUME	Landfill	≤6.75 million ft³ ≤250,000 yd³	>6.75 million to 675 million ft³ >250,000 to 25 million yd³	>675 million ft³ >25 million yd³	*ft³ ÷ 67,500* *yd³ ÷ 2,500*
	Surface impoundment	≤6,750 ft³ ≤250 yd³	>6,750 to 675,000 ft³ >250 to 25,000 yd³	>675,000 ft³ >25,000 yd³	*ft³ ÷ 67.5* *yd³ ÷ 2.5*
	Drums	≤1,000 drums	>1,000 to 100,000 drums	>100,000 drums	*drums ÷ 10*
	Tanks and non-drum containers	≤50,000 gallons	>50,000 to 5 million gallons	>5 million gallons	*gallons ÷ 500*
	Contaminated soil	≤6.75 million ft³ ≤250,000 yd³	>6.75 million to 675 million ft³ >250,000 to 25 million yd³	>675 million ft³ >25 million yd³	*ft³ ÷ 67,500* *yd³ ÷ 2,500*
	Pile	≤6,750 ft³ ≤250 yd³	>6,750 to 675,000 ft³ >250 to 25,000 yd³	>675,000 ft³ >25,000 yd³	*ft³ ÷ 67.5* *yd³ ÷ 2.5*
	Other	≤6,750 ft³ ≤250 yd³	>6,750 to 675,000 ft³ >250 to 25,000 yd³	>675,000 ft³ >25,000 yd³	*ft³ ÷ 67.5* *yd³ ÷ 2.5*
AREA	Landfill	≤340,000 ft² ≤7.8 acres	>340,000 to 34 million ft² >7.8 to 780 acres	>34 million ft² >780 acres	*ft² ÷ 3,400* *acres ÷ 0.078*
	Surface impoundment	≤1,300 ft² ≤0.029 acres	>1,300 to 130,000 ft² >0.029 to 2.9 acres	>130,000 ft² >2.9 acres	*ft² ÷ 13* *acres ÷ 0.00029*
	Contaminated soil	≤3.4 million ft² ≤78 acres	>3.4 million to 340 million ft² >78 to 7,800 acres	>340 million ft² >7,800 acres	*ft² ÷ 34,000* *acres ÷ 0.78*
	Pile*	≤1,300 ft² ≤0.029 acres	>1,300 to 130,000 ft² >0.029 to 2.9 acres	>130,000 ft² >2.9 acres	*ft² ÷ 13* *acres ÷ 0.00029*
	Land treatment	≤27,000 ft² ≤0.62 acres	>27,000 to 2.7 million ft² >0.62 to 62 acres	>2.7 million ft² >62 acres	*ft² ÷ 270* *acres ÷ 0.0062*

1 ton = 2,000 lb = 1 yd³ = 4 drums = 200 gallons

* Use area of land surface under pile, not surface area of pile.

PA Table 1b: WC Scores for Multiple Source Sites

WQ Total	*WC Score*
>0 to 100	18
>100 to 10,000	32
>10,000	100

GROUND WATER PATHWAY
GROUND WATER USE DESCRIPTION

Describe Ground Water Use Within 4-mi
(Describe stratigraphy, information on a and/or private wells)

The Warrenton Rubber site is located just north of the Fall Line and is underlain by undifferentiated granite gneiss (Ref. 11). Warrenton and its environs lie in the Washington Slope District of the Georgia Piedmont. The Washington Slope District is characterized by gently rolling terrain of broad, shallow valleys separated by broad, rounded divides. Relief varies from approximately 50-100 feet. Elevations near the Fall Line, the southern boundary of the district average approximately 500 feet above mean sea level (Ref. 12).

The Warrenton Rubber site is underlain by a typical Piedmont aquifer, an unconfined aquifer composed of fractured crystalline bedrock and the overlying mantle of residuum derived from weathering of the bedrock. Groundwater in such aquifers is generally encountered between 10 and approximately 600 feet of depth (Ref. 13) The vicinity of the Site has not been identified as a "most significant groundwater recharge area" (Ref. 14).

Warrenton City Water Department reports that Watershed Project No. 46 supplies the City of Warrenton and some of the county. This supply source consists of a 125-acre pond located approximately one mile to the west of the study property. Three deep wells, two at 275 ft. and one at 125 ft., are operated by a dairy farm approximately ¼ mile to the west (Ref. 4 & 15).

The population served by private drinking water wells within ¼, ½, 1, 2, 3, and 4 mile(s) from the site is approximately 2, 6, 21, 86, 162, and 248, respectively. The number of private wells and the respective population within 4 miles of the site are listed in Table 1 (Ref. 16).

Calculations for Drinking Water Populations Served by Ground Water:

LE 1: Wells within 4 mile radius of Warrenton Rubber Company Site

RADIUS (MILE)	DRILLED WELLS	DUG WELLS	OTHER WATER SOURCES	POP. ON PRIVATE WELLS
0 - 1/4	0.61	0.23	0.04	1.98
1/4 - 1/2	1.80	0.65	0.11	6.13
1/2 - 1	6.19	1.79	0.34	21.13
1 - 2	23.90	9.55	1.60	86.05
2 - 3	44.22	20.17	2.83	162.19
3 - 4	67.84	28.74	3.26	247.98
TOTAL	144.57	61.13	8.19	525.46

GROUND WATER PATHWAY CRITERIA LIST

SUSPECTED RELEASE

Yes	No	Unk	
☒	☐	☐	Are sources poorly contained?
☒	☐	☐	Is the source a type likely to contribute to ground water contamination (e.g., wet lagoon)?
☐	☐	☒	Is waste quantity particularly large?
☒	☐	☐	Is precipitation heavy?
☒	☐	☐	Is the infiltration rate high?
☐	☒		Is the site located in an area of karst terrain?
☐	☐	☐	Is the subsurface highly permeable or conductive?
☐	☒	☐	Is drinking water drawn from a shallow aquifer?
☒	☐	☐	Are suspected contaminants highly mobile in ground water?
☒	☐	☐	Does analytical or circumstantial evidence suggest ground water contamination?
☐	☐		Other criteria? _____
☒	☐		SUSPECTED RELEASE?

PRIMARY TARGETS

Yes	No	Unk	
☒	☐	☐	Is any drinking water well nearby?
☐	☒	☐	Has any nearby drinking water well been closed?
☐	☒	☐	Has any nearby drinking water user reported foul-tasting or foul-smelling water?
☒	☐	☐	Does any nearby well have a large drawdown or high production rate?
☐	☒	☐	Is any drinking water well located between the site and other wells that are suspected to be exposed to a hazardous substance?
☐	☒	☐	Does analytical or circumstantial evidence suggest contamination at a drinking water well?
☐	☒	☐	Does any drinking water well warrant sampling?
☐	☐		Other criteria? _____
☐	☒		PRIMARY TARGET(S) IDENTIFIED?

Summarize the rationale for Suspected Release (attach an additional page if necessary):

Analytical data indicates a release has occurred to the soil (TPH analysis). 1,1-Dichlorethane was detected in the ground water. No shallow water wells are located at the site (Ref. 4 & 15).

Summarize the rationale for Primary Targets (attach an additional page if necessary):

The nearest drinking water wells is located approximately ½ mile southwest of the site at a dairy/pecan farm. Two well are 275' and the other at 125'. Since these wells are used in the farming industry, a large draw down is possible (Ref. 4).

GROUND WATER PATHWAY SCORESHEET

Pathway Characteristics		
Do you suspect a release (see Ground Water Pathway Criteria List, page 7)?	Yes X	No ___
Is the site located in karst terrain?	Yes ___	No ___
Depth to aquifer:	___ ft	
Distance to the nearest drinking water well:	≥3000 ft	

LIKELIHOOD OF RELEASE	A Suspected Release	B No Suspected Release	References
1. SUSPECTED RELEASE: If you suspect a release to ground water (see page 7), assign a score of 550. Use only column A for this pathway.	550		10
2. NO SUSPECTED RELEASE: If you do not suspect a release to ground water, and the site is in karst terrain or the depth to aquifer is 70 feet or less, assign a score of 500; otherwise, assign a score of 340. Use only column B for this pathway.			
LR =	550		

TARGETS			
3. PRIMARY TARGET POPULATION: Determine the number of people served by drinking water wells that you suspect have been exposed to a hazardous substance from the site (see Ground Water Pathway Criteria List, page 7). 0 people x 10 =	0		4,20
4. SECONDARY TARGET POPULATION: Determine the number of people served by drinking water wells that you do NOT suspect have been exposed to a hazardous substance from the site, and assign the total population score from PA Table 2. Are any wells part of a blended system? Yes ___ No X If yes, attach a page to show apportionment calculations.	7		1,20
5. NEAREST WELL: If you have identified a primary target population for ground water, assign a score of 50; otherwise, assign the Nearest Well score from PA Table 2. If no drinking water wells exist within 4 miles, assign a score of zero.	18		4,20,16
6. WELLHEAD PROTECTION AREA (WHPA): If any source lies within or above a WHPA, or if you have identified any primary target well within a WHPA, assign a score of 20; assign 5 if neither condition holds but a WHPA is present within 4 miles; otherwise assign zero.	0		2,20
7. RESOURCES	5		4,2
T =	30		

WASTE CHARACTERISTICS		
8. A. If you have identified any primary target for ground water, assign the waste characteristics score calculated on page 4, or a score of 32, whichever is GREATER; do not evaluate part B of this factor.		
B. If you have NOT identified any primary target for ground water, assign the waste characteristics score calculated on page 4.	18	
WC =	18	

GROUND WATER PATHWAY SCORE: $\frac{LR \times T \times WC}{82,500}$ (subject to a maximum of 100) **4**

$\frac{550 \times 30 \times 18}{82500}$

PA TABLE 2: VALUES FOR SECONDARY GROUND WATER TARGET POPULATIONS

PA Table 2a: Non-Karst Aquifers

Distance from Site	Population	Nearest Well (choose highest)	Population Served by Wells Within Distance Category: 1 to 10	11 to 30	31 to 100	101 to 300	301 to 1,000	1,001 to 3,000	3,001 to 10,000	10,001 to 30,000	30,001 to 100,000	Greater than 100,000	Population Value
0 to ¼ mile	2	20	1	2	5	16	52	163	521	1,633	5,214	16,325	1
> ¼ to ½ mile	6	18 *	1	1	3	10	32	101	323	1,012	3,233	10,121	1
> ½ to 1 mile	21	9	1	1	2	5	17	52	167	522	1,668	5,224	1
> 1 to 2 miles	86	5	1	1	1	3	9	29	94	294	939	2,938	1
> 2 to 3 miles	162	3	1	1	1	2	7	21	68	212	678	2,122	2
> 3 to 4 miles	248	2	1	1	1	1	4	13	42	131	417	1,306	1
Nearest Well =		18										Score =	7

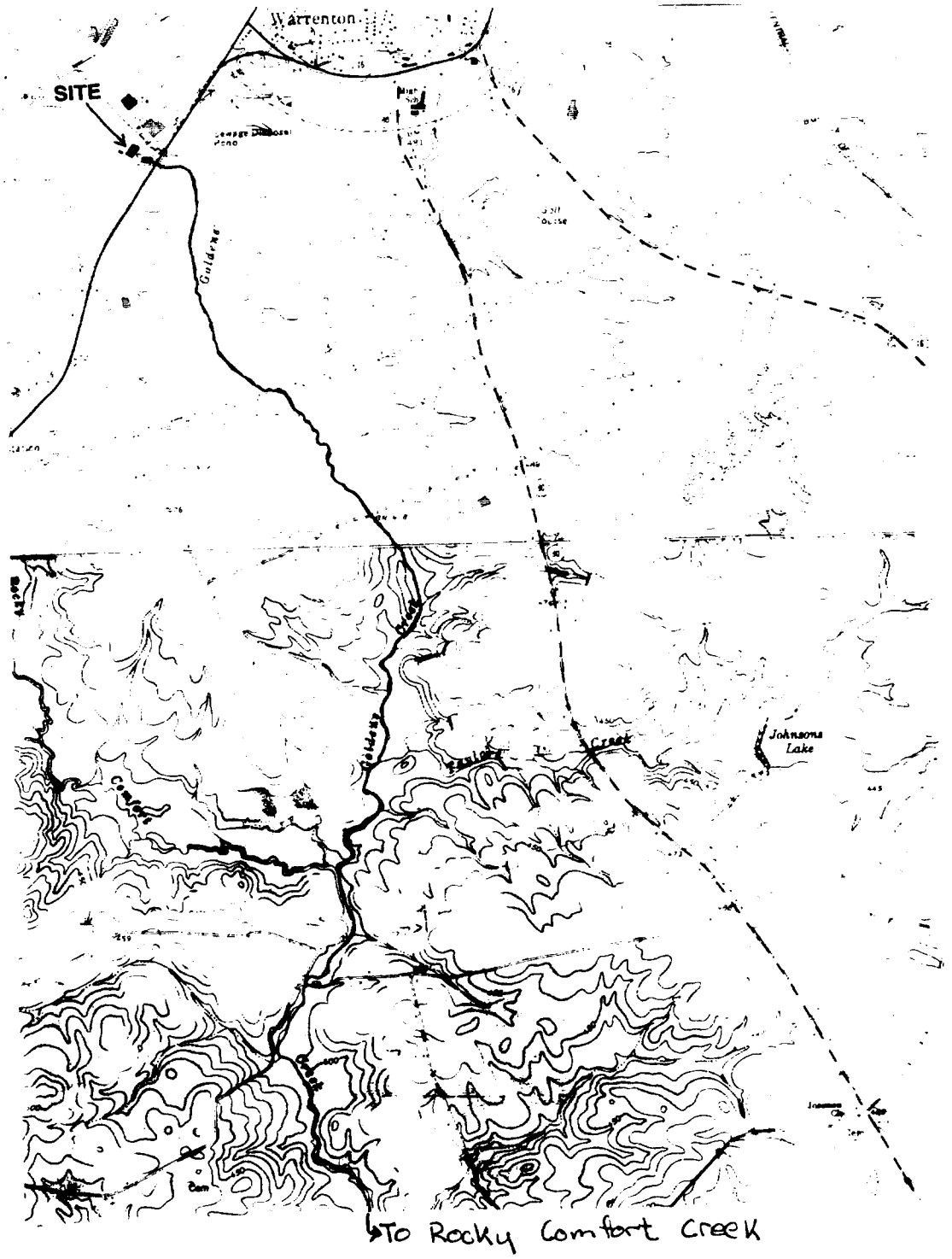
PA Table 2b: Karst Aquifers

Distance from Site	Population	Nearest Well (use 20 for karst)	Population Served by Wells Within Distance Category: 1 to 10	11 to 30	31 to 100	101 to 300	301 to 1,000	1,001 to 3,000	3,001 to 10,000	10,001 to 30,000	30,001 to 100,000	Greater than 100,000	Population Value
0 to ¼ mile		20	1	2	5	16	52	163	521	1,633	5,214	16,325	
> ¼ to ½ mile		20	1	1	3	10	32	101	323	1,012	3,233	10,121	
> ½ to 1 mile		20	1	1	3	8	26	82	261	816	2,607	8,162	
> 1 to 2 miles		20	1	1	3	8	26	82	261	816	2,607	8,162	
> 2 to 3 miles		20	1	1	3	8	26	82	261	816	2,607	8,162	
> 3 to 4 miles		20	1	1	3	8	26	82	261	816	2,607	8,162	
Nearest Well =												Score =	

* Ref. 4

SURFACE WATER PATHWAY
MIGRATION ROUTE SKETCH

Suface Water Migration Route Sketch:
(include runoff route, probable point of entry, 15-mile target distance limit, intakes, fisheries, and sensitive environments)



SURFACE WATER PATHWAY CRITERIA LIST

SUSPECTED RELEASE

Yes	No	Unk	
☒	☐	☐	Is surface water nearby?
☐	☒	☐	Is waste quantity particularly large?
☒	☐	☐	Is the drainage area large?
☒	☐	☐	Is rainfall heavy?
☐	☒	☐	Is the infiltration rate low?
☒	☐	☐	Are sources poorly contained or prone to runoff or flooding?
☒	☐	☐	Is a runoff route well defined (e.g., ditch or channel leading to surface water)?
☐	☒	☐	Is vegetation stressed along the probable run-off route?
☐	☒	☐	Are sediments or water unnaturally discolored?
☐	☒	☐	Is wildlife unnaturally absent?
☐	☒	☐	Has deposition of waste into surface water been observed?
☐	☒	☐	Is ground water discharge to surface water likely?
☐	☒	☐	Does analytical or circumstantial evidence suggest surface water contamination?
☐	☐		Other criteria?_____
☐	☒		**SUSPECTED RELEASE?**

PRIMARY TARGETS

Yes	No	Unk	
☐	☒	☐	Is any target nearby? If yes:
			☐ Drinking water intake ☐ Fishery ☐ Sensitive environment
☐	☒	☐	Has any intake, fishery, or recreational area been closed?
☐	☒	☐	Does analytical or circumstantial evidence suggest surface water contamination at or downstream of a target?
☐	☒	☐	Does any target warrant sampling? If yes:
			☐ Drinking water intake ☐ Fishery ☐ Sensitive environment
☐	☐		Other criteria?_____
☐	☒		**PRIMARY INTAKE(S) IDENTIFIED?**
☐	☒		**PRIMARY FISHERY(IES) IDENTIFIED?**
☐	☒		**PRIMARY SENSITIVE ENVIRONMENT(S) IDENTIFIED?**

Summarize the rationale for Suspected Release (attach an additional page if necessary):

No release to the surface water is suspected. No signs of a release or stress vegetation were noted during the site reconnaissance (Ref. 4). Also surface water samples were taken during an environmental assessment in 1998 which concluded no contamination (Ref. 15).

Summarize the rationale for Primary Targets (attach an additional page if necessary):

No primary targets were noted from the site reconnaissance (Ref. 4). Also no targets were found on the topographical map for Warren County (Ref. 2).

SURFACE WATER PATHWAY
LIKELIHOOD OF RELEASE AND DRINKING WATER THREAT SCORESHEET

Pathway Characteristics

Do you suspect a release (see Surface Water Pathway Criteria List, page 11)? Yes ___ No X
Distance to surface water: 150 ft
Flood frequency: >100 yrs
What is the downstream distance to the nearest drinking water intake? >15 miles
Nearest fishery? >15 miles Nearest sensitive environment? >15 miles

	A Suspected Release	B No Suspected Release	References
LIKELIHOOD OF RELEASE			
1. SUSPECTED RELEASE: If you suspect a release to surface water (see page 11), assign a score of 550. Use only column A for this pathway.	(550)		
2. NO SUSPECTED RELEASE: If you do not suspect a release to surface water, use the table below to assign a score based on distance to surface water and flood frequency. Use only column B for this pathway.		(500, 400, 300 or 100)	
500			4, 21
LR =		500	

Distance to surface water ≤ 2,500 feet	500
Distance to surface water > 2,500 feet, and	
Site in annual or 10-year floodplain	500
Site in 100-year floodplain	400
Site in 500-year floodplain	300
Site outside 500-year floodplain	100

DRINKING WATER THREAT TARGETS

3. Record the water body type, flow (if applicable), and number of people served by each drinking water intake within the target distance limit. If there is no drinking water intake within the target distance limit, factors 4, 5, and 6 each receive zero scores.

Intake Name	Water Body Type	Flow	People Served
		cfs	
		cfs	
		cfs	

2, 20

4. PRIMARY TARGET POPULATION: If you suspect any drinking water intake listed above has been exposed to a hazardous substance from the site (see Surface Water Pathway Criteria List, page 11), list the intake name(s) and calculate the factor score based on the total population served.

_____, _____,

_____ people x 10 = ___

5. SECONDARY TARGET POPULATION: Determine the number of people served by drinking water intakes that you do NOT suspect have been exposed to a hazardous substance from the site, and assign the total population score from PA Table 3.

Are any intakes part of a blended system? Yes ___ No ___
If yes, attach a page to show apportionment calculations.

0 — 2, 20

6. NEAREST INTAKE: If you have identified a primary target population for the drinking water threat (factor 4), assign a score of 50; otherwise, assign the Nearest Intake score from PA Table 3. If no drinking water intake exists within the target distance limit, assign a score of zero.

(50, 20, 10, 2, 1, or 0) — (20, 10, 2, 1, or 0)

0 — 2, 20

7. RESOURCES

(5 or 0) — (5 or 0)

5 — 2

T = 5

PA TABLE 3: VALUES FOR SECONDARY SURFACE WATER TARGET POPULATIONS

Surface Water Body Flow (see PA Table 4)	Population	Nearest Intake (choose highest)	Population Served by Intakes Within Flow Category											Population Value
			1 to 30	31 to 100	101 to 300	301 to 1,000	1,001 to 3,000	3,001 to 10,000	10,001 to 30,000	30,001 to 100,000	100,001 to 300,000	300,001 to 1,000,000	Greater than 1,000,000	
<10 cfs	_____	20	2	5	16	52	163	521	1,633	5,214	16,325	52,136	163,248	_____
10 to 100 cfs	_____	2	1	1	2	5	16	52	163	521	1,633	5,214	16,325	_____
>100 to 1,000 cfs	_____	1	0	0	1	1	2	5	16	52	163	521	1,633	_____
>1,000 to 10,000 cfs	_____	0	0	0	0	0	1	1	2	5	16	52	163	_____
>10,000 cfs or Great Lakes	_____	0	0	0	0	0	0	0	1	1	2	5	16	_____
3-mile Mixing Zone	_____	10	1	3	8	26	82	261	816	2,607	8,162	26,068	81,663	_____

Nearest Intake = _____ Score = _____

PA TABLE 4: SURFACE WATER TYPE / FLOW CHARACTERISTICS WITH DILUTION WEIGHTS FOR SECONDARY SURFACE WATER SENSITIVE ENVIRONMENTS

Type of Surface Water Body			Dilution Weight
Water Body Type	OR	Flow	
minimal stream		< 10 cfs	1
small to moderate stream		10 to 100 cfs	0.1
moderate to large stream		> 100 to 1,000 cfs	N/A
large stream to river		> 1,000 to 10,000 cfs	N/A
large river		> 10,000 cfs	N/A
3-mile mixing zone of quiet flowing streams or rivers		10 cfs or greater	N/A
coastal tidal water (harbors, sounds, bays, etc.), ocean, or Great Lakes		N/A	N/A

SURFACE WATER PATHWAY (continued)
HUMAN FOOD CHAIN THREAT SCORESHEET

LIKELIHOOD OF RELEASE		A Suspected Release	B No Suspected Release	References
Enter Surface Water Likelihood of Release score from page 12.	LR =		500	

HUMAN FOOD CHAIN THREAT TARGETS

8. Record the water body type and flow (if applicable) for each fishery within the target distance limit. If there is no fishery within the target distance limit, assign a Targets score of 0 at the bottom of the page.

Fishery Name	Water Body Type	Flow
Goldens Creek	min stream	<10 cfs
Rocky Comfort	min stream	<10 cfs
		cfs
		cfs
		cfs

9. PRIMARY FISHERIES: If you suspect any fishery listed above has been exposed to a hazardous substance from the site (see Surface Water Criteria List, page 11), assign a score of 300 and do not evaluate Factor 10. List the primary fisheries:

_____, _____

_____, _____

10. SECONDARY FISHERIES

A. If you suspect a release to surface water and have identified a secondary fishery but no primary fishery, assign a score of 210.

B. If you do not suspect a release, assign a Secondary Fisheries score from the table below using the lowest flow at any fishery within the target distance limit.

Lowest Flow	Secondary Fisheries Score
< 10 cfs	210
10 to 100 cfs	30
> 100 cfs, coastal tidal waters, oceans, or Great Lakes	12

210 — A, 2

T = 210

SURFACE WATER PATHWAY (continued)
ENVIRONMENTAL THREAT SCORESHEET

LIKELIHOOD OF RELEASE		A Suspected Release	B No Suspected Release	References
Enter Surface Water Likelihood of Release score from page 12.	LR =		500	

ENVIRONMENTAL THREAT TARGETS

11. Record the water body type and flow (if applicable) for each surface water sensitive environment within the target distance limit (see PA Tables 4 and 5). If there is no sensitive environment within the target distance limit, assign a Targets score of 0 at the bottom of the page.

Environment Name	Water Body Type	Flow
		cfs
		cfs
		cfs
		cfs
		cfs

2,4

12. PRIMARY SENSITIVE ENVIRONMENTS: If you suspect any sensitive environment listed above has been exposed to a hazardous substance from the site (see Surface Water Criteria List, page 11), assign a score of 300 and do not evaluate factor 13. List the primary sensitive environments:

_____, _____,
_____, _____.

13. SECONDARY SENSITIVE ENVIRONMENTS: If sensitive environments are present, but none is a primary sensitive environment, evaluate Secondary Sensitive Environments based on flow.

A. For secondary sensitive environments on surface water bodies with flows of 100 cfs or less, assign scores as follows, and do not evaluate part B of this factor:

Flow	Dilution Weight (PA Table 4)	Environment Type and Value (PA Tables 5 and 6)	Total
cfs	x	=	
cfs	x	=	
cfs	x	=	
cfs	x	=	
cfs	x	=	

Sum =

B. If all secondary sensitive environments are located on surface water bodies with flows >100 cfs, assign a score of 10.

T = 0

PA TABLE 5: SURFACE WATER AND AIR PATHWAY SENSITIVE ENVIRONMENTS VALUES

Sensitive Environment	*Assigned Value*
Critical habitat for Federally designated endangered or threatened species	100
Marine Sanctuary	
National Park	
Designated Federal Wilderness Area	
Ecologically important areas identified under the Coastal Zone Wilderness Act	
Sensitive Areas identified under the National Estuary Program or Near Coastal Water Program of the Clean Water Act	
Critical Areas identified under the Clean Lakes Program of the Clean Water Act (subareas in lakes or entire small lakes)	
National Monument (air pathway only)	
National Seashore Recreation Area	
National Lakeshore Recreation Area	
Habitat known to be used by Federally designated or proposed endangered or threatened species	75
National Preserve	
National or State Wildlife Refuge	
Unit of Coastal Barrier Resources System	
Federal land designated for the protection of natural ecosystems	
Administratively Proposed Federal Wilderness Area	
Spawning areas critical for the maintenance of fish/shellfish species within a river system, bay, or estuary	
Migratory pathways and feeding areas critical for the maintenance of anadromous fish species in a river system	
Terrestrial areas utilized for breeding by large or dense aggregations of vertebrate animals (air pathway) or semi-aquatic foragers (surface water pathway)	
National river reach designated as Recreational	
Habitat known to be used by State designated endangered or threatened species	50
Habitat known to be used by a species under review as to its Federal endangered or threatened status	
Coastal Barrier (partially developed)	
Federally designated Scenic or Wild River	
State land designated for wildlife or game management	25
State designated Scenic or Wild River	
State designated Natural Area	
Particular areas, relatively small in size, important to maintenance of unique biotic communities	
State designated areas for protection/maintenance of aquatic life under the Clean Water Act	5
Wetlands	See PA Table 6 (Surface Water Pathway) or PA Table 9 (Air Pathway)

PA TABLE 6: SURFACE WATER PATHWAY WETLANDS FRONTAGE VALUES

Total Length of Wetlands	*Assigned Value*
Less than 0.1 mile	0
0.1 to 1 mile	25
Greater than 1 to 2 miles	50
Greater than 2 to 3 miles	75
Greater than 3 to 4 miles	100
Greater than 4 to 8 miles	150
Greater than 8 to 12 miles	250
Greater than 12 to 16 miles	350
Greater than 16 to 20 miles	450
Greater than 20 miles	500

SURFACE WATER PATHWAY (concluded)
WASTE CHARACTERISTICS, THREAT, AND PATHWAY SCORE SUMMARY

WASTE CHARACTERISTICS	A *Suspected Release*	B *No Suspected Release*
14. A. If you have identified any primary target for surface water (pages 12, 14, or 15), assign the waste characteristics score calculated on page 4, or a score of 32, whichever is GREATER; do not evaluate part B of this factor.	(100 or 32)	
B. If you have NOT identified any primary target for surface water, assign the waste characteristics score calculated on page 4.	(100,32, or 18)	(100,32, or 18) 18
WC =		18

SURFACE WATER PATHWAY THREAT SCORES

Threat	*Likelihood of Release (LR) Score (from page 12)*	*Targets (T) Score (pages 12, 14, 15)*	*Pathway Waste Characteristics (WC) Score (determined above)*	*Threat Score LR x T x WC / 82,500*
Drinking Water	500	5	18	(Multiply to a maximum of 100) .545
Human Food Chain	500	210	18	(Multiply to a maximum of 100) 229
Environmental	500	0	18	(Multiply to a maximum of 60) 0

SURFACE WATER PATHWAY SCORE
(Drinking Water Threat + Human Food Chain Threat + Environmental Threat)

(Multiply to a maximum of 100)
24

SOIL EXPOSURE PATHWAY CRITERIA LIST				
SUSPECTED CONTAMINATION	***RESIDENT POPULATION***			
	Yes	No	Unk	
Surficial contamination can generally be assumed.	☐	☒	☐	Is any residence, school, or daycare facility on or within 200 feet of an area of suspected contamination?
	☐	☒	☐	Is any residence, school, or daycare facility located on adjacent land previously owned or leased by the site owner/operator?
	☐	☒	☐	Is there a migration route that might spread hazardous substances near residences, schools, or daycare facilities?
	☐	☒	☐	Have onsite or adjacent residents or students reported adverse health effects, exclusive of apparent drinking water or air contamination problems?
	☐	☒	☐	Does any neighboring property warrant sampling?
	☐	☒		Other criteria?_____
	☐	☒		**RESIDENT POPULATION IDENTIFIED?**

Summarize the rationale for Resident Population (attach an additional page if necessary):

The site is currently used as a waste transfer station. David Paraham, currently operates Lee & D Contractors Inc., Transfer Station which employees two (2) workers that handle the waste and a driver. A total of four (4) people would have access to the site (Ref. 4). No health problems were reported from the site (Ref 4 & 16).

No residence, school or daycare facility is located within 200 ft. of the site. The migration route for the surface water does not appear to intersect any residence, schools, or daycare facilities within the target distance (Ref. 1 & 4). Since it does not appear that a release to surface water is suspected, no neighboring property warrants sampling.

SOIL EXPOSURE PATHWAY SCORESHEET

Pathway Characteristics		
Do any people live on or within 200 ft of areas of suspected contamination?	Yes ___	No X
Do any people attend school or daycare on or within 200 ft of areas of suspected contamination?	Yes ___	No X
Is the facility active? Yes X No ___ If yes, estimate the number of workers: 4		

LIKELIHOOD OF EXPOSURE	Suspected Contamination	References
1. SUSPECTED CONTAMINATION: Surficial contamination can generally be assumed, and a score of 550 assigned. Assign zero only if the absence of surficial contamination can be confidently demonstrated. LE =	550	10
RESIDENT POPULATION THREAT TARGETS		
2. RESIDENT POPULATION: Determine the number of people occupying residences or attending school or daycare on or within 200 feet of areas of suspected contamination (see Soil Exposure Pathway Criteria List, page 18). ___ people x 10 =	0	4
3. RESIDENT INDIVIDUAL: If you have identified a resident population (factor 2), assign a score of 50; otherwise, assign a score of 0.	0	4
4. WORKERS: Use the following table to assign a score based on the total number of workers at the facility and nearby facilities with suspected contamination:	5	4
5. TERRESTRIAL SENSITIVE ENVIRONMENTS: Use PA Table 7 to assign a value for each terrestrial sensitive environment on an area of suspected contamination: Sum =	0	4
6. RESOURCES	0	4
T =	5	
WASTE CHARACTERISTICS		
7. Assign the waste characteristics score calculated on page 4. WC =	18	

Number of Workers	Score
0	0
1 to 100	5
101 to 1,000	10
>1,000	15

Terrestrial Sensitive Environment Type	Value

RESIDENT POPULATION THREAT SCORE: $\frac{LE \times T \times WC}{82,500.}$ = .6

NEARBY POPULATION THREAT SCORE: 167.35 per mile = 1 — 16

SOIL EXPOSURE PATHWAY SCORE:
Resident Population Threat + Nearby Population Threat = 2

PA TABLE 7: SOIL EXPOSURE PATHWAY
TERRESTRIAL SENSITIVE ENVIRONMENT VALUES

Terrestrial Sensitive Environment	*Assigned Value*
Terrestrial critical habitat for Federally designated endangered or threatened species National Park Designated Federal Wilderness Area National Monument	100
Terrestrial habitat known to be used by Federally designated or proposed threatened or endangered species National Preserve (terrestrial) National or State terrestrial Wildlife Refuge Federal land designated for protection of natural ecosystems Administratively proposed Federal Wilderness Area Terrestrial areas utilized by large or dense aggregations of animals (vertebrate species) for breeding	75
Terrestrial habitat used by State designated endangered or threatened species Terrestrial habitat used by species under review for Federal designated endangered or threatened status	50
State lands designated for wildlife or game management State designated Natural Areas Particular areas, relatively small in size, important to maintenance of unique biotic communities	25

AIR PATHWAY CRITERIA LIST

SUSPECTED RELEASE				PRIMARY TARGETS
Yes	No	Unk		
☐	☒	☐	Are odors currently reported?	If you suspect a release to air, evaluate all populations and sensitive environments within 1/4 mile (including those onsite) as primary targets.
☐	☒	☐	Has release of a hazardous substance to the air been directly observed?	
☐	☒	☐	Are there reports of adverse health effects (e.g., headaches, nausea, dizziness) potentially resulting from migration of hazardous substances through the air?	
☐	☒	☐	Does analytical or circumstantial evidence suggest a release to the air?	
☐	☒		Other criteria? _____	
☐	☒		**SUSPECTED RELEASE?**	

Summarize the rationale for Suspected Release (attach an additional page if necessary):

There is no documentation of adverse health effects pertaining to the release of constituents to the air (Ref. 18). During site reconnaissance, no release to the air was observed (Ref. 4).

AIR PATHWAY SCORESHEET

Pathway Characteristics	
Do you suspect a release (see Air Pathway Criteria List, page 21)?	Yes ___ No X
Distance to the nearest individual:	20 ft

	A Suspected Release	B No Suspected Release	References
LIKELIHOOD OF RELEASE			
1. SUSPECTED RELEASE: If you suspect a release to air (see page 21), assign a score of 550. Use only column A for this pathway.			___
2. NO SUSPECTED RELEASE: If you do not suspect a release to air, assign a score of 500. Use only column B for this pathway.		500	4,10
LR =		500	
TARGETS			
3. PRIMARY TARGET POPULATION: Determine the number of people subject to exposure from a suspected release of hazardous substances to the air. ___ people x 10 =			___
4. SECONDARY TARGET POPULATION: Determine the number of people not suspected to be exposed to a release to air, and assign the total population score using PA Table 8.		5	16
5. NEAREST INDIVIDUAL: If you have identified any Primary Target Population for the air pathway, assign a score of 50; otherwise, assign the Nearest Individual score from PA Table 8.		20	4,16
6. PRIMARY SENSITIVE ENVIRONMENTS: Sum the sensitive environment values (PA Table 5) and wetland acreage values (PA Table 9) for environments subject to exposure from a suspected release to the air.			
Sum =			___
7. SECONDARY SENSITIVE ENVIRONMENTS: Use PA Table 10 to determine the score for secondary sensitive environments.		0	2
8. RESOURCES		5	4
T =		30	
WASTE CHARACTERISTICS			
9. A. If you have identified any Primary Target for the air pathway, assign the waste characteristics score calculated on page 4, or a score of 32, whichever is GREATER; do not evaluate part B of this factor.			
B. If you have NOT identified any Primary Target for the air pathway, assign the waste characteristics score calculated on page 4.		18	
WC =		18.	

Sensitive Environment Type	Value

AIR PATHWAY SCORE: $\frac{LR \times T \times WC}{82,500}$ = 3

PA TABLE 8: VALUES FOR SECONDARY AIR TARGET POPULATIONS

Distance from Site	Population	Nearest Individual (choose highest)	Population Within Distance Category: 1 to 10	11 to 30	31 to 100	101 to 300	301 to 1,000	1,001 to 3,000	3,001 to 10,000	10,001 to 30,000	30,001 to 100,000	100,001 to 300,000	300,001 to 1,000,000	Greater than 1,000,000	Population Value
Onsite	4	20	1	2	5	16	52	163	521	1,633	5,214	16,325	52,136	163,248	1
>0 to ¼ mile	3	20	1	1	1	4	13	41	130	408	1,303	4,081	13,034	40,811	1
>¼ to ½ mile	12	2	0	0	1	1	3	9	28	88	282	882	2,815	8,815	0
>½ to 1 mile	153	1	0	0	0	1	1	3	8	26	83	261	834	2,612	1
>1 to 2 miles	911	0	0	0	0	0	1	1	3	8	27	83	266	833	1
>2 to 3 miles	1083	0	0	0	0	0	1	1	1	4	12	38	120	376	1
>3 to 4 miles	563	0	0	0	0	0	0	1	1	2	7	23	73	228	0

Nearest Individual = 20

Score = 5

PA TABLE 9: AIR PATHWAY VALUES FOR WETLAND AREA

Wetland Area	Assigned Value
Less than 1 acre	0
1 to 50 acres	25
Greater than 50 to 100 acres	75
Greater than 100 to 150 acres	125
Greater than 150 to 200 acres	175
Greater than 200 to 300 acres	250
Greater than 300 to 400 acres	350
Greater than 400 to 500 acres	450
Greater than 500 acres	500

PA TABLE 10: DISTANCE WEIGHTS AND CALCULATIONS FOR AIR PATHWAY SECONDARY SENSITIVE ENVIRONMENTS

Distance	Distance Weight	Sensitive Environment Type and Value (from PA Table 5 or 9)	Product
Onsite	0.10	x	
		x	
0-1/4 mi	0.025	x	
		x	
		x	
1/4-1/2mi	0.0054	x	
		x	
		x	
		x	

Total Environments Score =

SITE SCORE CALCULATION

	S	S^2
GROUND WATER PATHWAY SCORE (S_{gw}):	4	16
SURFACE WATER PATHWAY SCORE (S_{sw}):	24	576
SOIL EXPOSURE PATHWAY SCORE (S_s):	2	4
AIR PATHWAY SCORE (S_a):	3	9
SITE SCORE: $\sqrt{\frac{S_{gw}^2+S_{sw}^2+S_s^2+S_a^2}{4}}$		12.3

SUMMARY

	YES	NO
1. Is there a high possibility of a threat to any nearby drinking water well(s) by migration of a hazardous substance in ground water?	☐	☒
A. If yes, identify the well(s).		
B. If yes, how many people are served by the threatened well(s)?		
2. Is there a high possibility of a threat to any of the following by hazardous substance migration in surface water?		
A. Drinking water intake	☐	☒
B. Fishery	☐	☒
C. Sensitive environment (wetland, critical habitat, others)	☐	☒
D. If yes, identify the target(s).		
3. Is there a high possibility of an area of surficial contamination within 200 feet of any residence, school, or daycare facility?	☐	☒
If yes, identify the property(ies) and estimate the associated population(s).		
4. Are there public health concerns at this site that are not addressed by PA scoring considerations? If yes, explain:	☒	☐

Soil and ground water contamination are evident at the site. Although it seems there are no apparent targets in the area, there is contamination at the site.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

MAR 06 1995

4WD-ERRB

Ms. Jennifer Kaduck, Chief
Hazardous Waste Management Branch
Environmental Protection Division
Department of Natural Resources
205 Butler Street
Suite 1154 - East Tower
Atlanta, Georgia 30334

SUBJ: Warrenton Rubber Company Site, Warrenton, Georgia

Dear Mr. Kaduck:

On February 23, 1995, the U.S. Environmental Protection Agency's Emergency Response and Removal Branch (ERRB) reviewed the available information for the above referenced site to determine its eligibility for a potential removal action under the National Contingency Plan (NCP). The site information was evaluated using criteria from Section 300.415 of the NCP and current ERRB program guidance.

Andrea Madigan, of the EPA Office of Regional Counsel, referred the Warrenton Rubber Company Site to ERRB on February 23, 1995. The referral package included a transmittal letter dated February 21, 1995, drum/product removal invoices, environmental assessments and other related site file material.

The Site is located at 101 Flower Street in Warrenton, Georgia. The E.H. Mann, Inc., d/b/a Warrenton Rubber Company, has filed for bankruptcy. The transmittal letter stated that "...all potentially hazardous waste materials have now been removed from the Site...". The drum/product removal invoices indicated that 19 drums and an additional 1,950 gallons of bulked waste was disposed of by Alternate Energy Resources, Inc. between December 1993 and May 1994. A Phase II Soils Assessment was performed in 1990, in which 24 soil samples were obtained and analyzed. During the Environmental Assessment of October 1994, four soil samples and two groundwater samples were obtained and analyzed. The results of this sampling event indicated ranges from 25 to 130 ppm of Total Petroleum Hydrocarbons (TPH) in the soil and Below Detection Limit to 0.5 ppb of 1,1-Dichloroethane in the groundwater. The Removal Action Level for 1,1-Dichloroethane is 3,500 ppb, as defined in OSWER Directive 9360.1-02 Final Guidance on Numeric Removal Action Levels for Contaminated Drinking Water Sites.

Printed on Recycled Paper

Based upon ERRB's review of the available information, the site does not meet the criteria for removal eligibility. This determination does not preclude any other investigation activities or response actions by other parties which may still be appropriate for this site. Should site conditions change or additional information become available, ERRB will re-evaluate this site as necessary.

Should you have any questions concerning ERRB's determination, please contact Mrs. Samantha Urquhart-Foster, On-Scene Coordinator, at (404) 347-3931 extension 6102 or Mr. Shane Hitchcock, Chief of Removal Operations Section, at (404) 347-3931 extension 6122.

Sincerely,

Myron D. Lair, Chief
Emergency Response and Removal
Branch

cc: Narindar Kumar, Site Assessment Section, EPA
Andrea Madigan, EPA - ORC

Urquhart-Foster/scuf:4WD-ERRB:6102/03-06-95/WARREN.RAT

URQUHART-FOSTER HITCHCOCK LAIR

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

Mario
John Mck

4WD-ERRB

Ms. Jennifer Kaduck, Chief
Hazardous Waste Management Branch
Environmental Protection Division
Department of Natural Resources
205 Butler Street
Suite 1154 - East Tower
Atlanta, Georgia 30334

SUBJ: Warrenton Rubber Company Site, Warrenton, Georgia

Dear Ms. Kaduck:

On February 23, 1995, the U.S. Environmental Protection Agency's Emergency Response and Removal Branch (ERRB) reviewed the available information for the above referenced site to determine its eligibility for a potential removal action under the National Contingency Plan (NCP). The site information was evaluated using criteria from Section 300.415 of the NCP and current ERRB program guidance.

Andrea Madigan, of the EPA Office of Regional Counsel, referred the Warrenton Rubber Company Site to ERRB on February 23, 1995. The referral package included a transmittal letter dated February 21, 1995, drum/product removal invoices, environmental assessments and other related site file material.

The Site is located at 101 Flower Street in Warrenton, Georgia. The E.H. Mann, Inc., d/b/a Warrenton Rubber Company, has filed for bankruptcy. The transmittal letter stated that "...all potentially hazardous waste materials have now been removed from the Site...". The drum/product removal invoices indicated that 19 drums and an additional 1,950 gallons of bulked waste was disposed of by Alternate Energy Resources, Inc. between December 1993 and May 1994. A Phase II Soils Assessment was performed in 1990, in which 24 soil samples were obtained and analyzed. During the Environmental Assessment of October 1994, four soil samples and two groundwater samples were obtained and analyzed. The results of this sampling event indicated ranges from 25 to 130 ppm of Total Petroleum Hydrocarbons (TPH) in the soil and Below Detection Limit to 0.5 ppb of 1,1-Dichloroethane in the groundwater. The Removal Action Level for 1,1-Dichloroethane is 3,500 ppb, as defined in OSWER Directive 9360.1-02 Final Guidance on Numeric Removal Action Levels for Contaminated Drinking Water Sites.

Printed on Recycled Paper

Based upon ERRB's review of the available information, the site does not meet the criteria for removal eligibility. This determination does not preclude any other investigation activities or response actions by other parties which may still be appropriate for this site. Should site conditions change or additional information become available, ERRB will re-evaluate this site as necessary.

Should you have any questions concerning ERRB's determination, please contact Mrs. Samantha Urquhart-Foster, On-Scene Coordinator, at (404) 347-3931 extension 6102 or Mr. Shane Hitchcock, Chief of Removal Operations Section, at (404) 347-3931 extension 6122.

Sincerely,

Myron D. Lair, Chief
Emergency Response and Removal
Branch

cc: Narindar Kumar, Site Assessment Section, EPA
Andrea Madigan, EPA - ORC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

February 23, 1995

4WD-ERRB

MEMORANDUM

SUBJECT: Warrenton Rubber Company Site
Warrenton, Georgia

FROM: Samantha Urquhart-Foster, On-Scene Coordinator
Emergency Response and Removal Branch

TO: Removal Assessment Team
Emergency Response and Removal Branch

Andrea Madigan, of the EPA Office of Regional Counsel referred the Warrenton Rubber Company Site to Doug Lair for review for potential removal action on February 23, 1995. The referral package included a transmittal letter dated February 21, 1995, drum/product removal invoices, environmental assessments and other related site file material.

The Site is located at 101 Flower Street in Warrenton, Georgia. The E.H. Mann, Inc., d/b/a Warrenton Rubber Company, has filed for bankruptcy. The transmittal letter stated that "...all potentially hazardous waste materials have now been removed from the Site...". The drum/product removal invoices indicated that 19 drums and an additional 1,950 gallons of bulked waste was disposed of by Alternate Energy Resources, Inc. between December 1993 and May 1994. A Phase II Soils Assessment was performed in 1990, in which 24 soil samples were obtained and analyzed. During the Environmental Assessment of October 1994, four soil samples and two groundwater samples were obtained and analyzed. The results of this sampling event indicated ranges from 25 to 130 ppm of Total Petroleum Hydrocarbons (TPH) in the soil and Below Detection Limit to 0.5 ppb of 1,1-Dichloroethane in the groundwater. The Removal Action Level for 1,1-Dichloroethane is 3,500 ppb, as defined in OSWER Directive 9360.1-02 Final Guidance on Numeric Removal Action Levels for Contaminated Drinking Water Sites.

Based on a review of the submitted Site file data, the low levels of TPH in the soil and Volatile Organic Compounds in the groundwater do not meet the NCP removal criteria. I therefore recommend the classification of this site as No Further Action (NFA) by ERRB.

Printed on Recycled Paper

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

4WD-ERRB

Ms. Jennifer Kaduck, Chief
Hazardous Waste Management Branch
Environmental Protection Division
Department of Natural Resources
205 Butler Street
Suite 1154 - East Tower
Atlanta, Georgia 30334

SUBJ: Warrenton Rubber Company Site, Warrenton, Georgia

Dear Ms. Kaduck:

On February 23, 1995, the U.S. Environmental Protection Agency's Emergency Response and Removal Branch (ERRB) reviewed the available information for the above referenced site to determine its eligibility for a potential removal action under the National Contingency Plan (NCP). The site information was evaluated using criteria from Section 300.415 of the NCP and current ERRB program guidance.

Andrea Madigan, of the EPA Office of Regional Counsel, referred the Warrenton Rubber Company Site to ERRB on February 23, 1995. The referral package included a transmittal letter dated February 21, 1995, drum/product removal invoices, environmental assessments and other related site file material.

The Site is located at 101 Flower Street in Warrenton, Georgia. The E.H. Mann, Inc., d/b/a Warrenton Rubber Company, has filed for bankruptcy. The transmittal letter stated that "...all potentially hazardous waste materials have now been removed from the Site...". The drum/product removal invoices indicated that 19 drums and an additional 1,950 gallons of bulked waste was disposed of by Alternate Energy Resources, Inc. between December 1993 and May 1994. A Phase II Soils Assessment was performed in 1990, in which 24 soil samples were obtained and analyzed. During the Environmental Assessment of October 1994, four soil samples and two groundwater samples were obtained and analyzed. The results of this sampling event indicated ranges from 25 to 130 ppm of Total Petroleum Hydrocarbons (TPH) in the soil and Below Detection Limit to 0.5 ppb of 1,1-Dichloroethane in the groundwater. The Removal Action Level for 1,1-Dichloroethane is 3,500 ppb, as defined in OSWER Directive 9360.1-02 Final Guidance on Numeric Removal Action Levels for Contaminated Drinking Water Sites.

Printed on Recycled Paper

Based upon ERRB's review of the available information, the site does not meet the criteria for removal eligibility. This determination does not preclude any other investigation activities or response actions by other parties which may still be appropriate for this site. Should site conditions change or additional information become available, ERRB will re-evaluate this site as necessary.

Should you have any questions concerning ERRB's determination, please contact Mrs. Samantha Urquhart-Foster, On-Scene Coordinator, at (404) 347-3931 extension 6102 or Mr. Shane Hitchcock, Chief of Removal Operations Section, at (404) 347-3931 extension 6122.

Sincerely,

Myron D. Lair, Chief
Emergency Response and Removal
Branch

cc: Narindar Kumar, Site Assessment Section, EPA
Andrea Madigan, EPA - ORC

Urquhart-Foster/scuf:4WD-ERRB:6102/03-06-95/WARREN.RAT

URQUHART-FOSTER
SUF
03/06/95

HITCHCOCK

LAIR

NSS Environmental, Inc.

Industry's Partner in Environmental and Safety Management

Facsimile Transmittal

Date: 2-17-95 Time: _____

TO: Ms. Gail Scogin
US. EPA
1-404-347-4464

FROM: Patrick J. Sego

NSS Environmental, Inc.
Facsimile Number: (502) 423-7663

Total Number of Pages Transmitted 11 (including cover sheet)

Comments: As per your request to John Bleidt. If you have any questions please call at (502) 423-7663.

92-FRM-02018-24

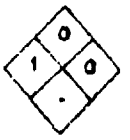
8003 Vinecrest Avenue, Suite 4, Louisville, Kentucky 40222

CINCINNATI MILACRON

MATERIAL SAFETY DATA SHEET

PRINTED: February 9, 1992
DATE EFFECTIVE: 12/91
MSDS Number: 042

CIMSTAR® QUAL STAR®



1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name(s):
CIMSTAR QUAL STAR
CIMSTAR QUAL STAR
CIMSTAR QUAL STAR

Product Code(s):
Undyed 042
Pink 043
Green 044

Manufacturer:
Products Division/
Cincinnati Milacron
Marketing Company
4701 Marburg Avenue
Cincinnati, OH 45209

Emergency Telephone Number
513-841-8181

Information Telephone Number
513-841-8964

Generic Name:
Water-based metalworking fluid concentrate

2. EMERGENCY OVERVIEW

Product is a clear liquid which may be dyed. Product is alkaline and a primary eye irritant. Highway spills in rainy weather could result in slippery road conditions.

No other significant health effects are associated with this material.

3. HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Hazardous Components	CAS Number	Max %
Mineral oil	64742-52-5	30
Ethanolamine	141-43-5	10
Nonylphenoxy-polyethoxyethanol	9016-45-9	10
Triethanolamine	102-71-6	10
Organic acid	Trade Secret	10

These ingredients may contribute to the acute product hazards listed under the Potential Health Effects section. Other substances, not "Hazardous" under the OSHA Hazard Communication Standard may be present. Further composition information may be made available to health professionals as provided in the standard.

4. HAZARDS IDENTIFICATION

Potential Health Effects of Direct Exposure

	Product Concentrate	Product at Use Dilution
Inhalation	Not Applicable	Extended Exposure to mists may cause upper respiratory irritation
Eye Contact	Primary eye irritant	Will cause stinging sensation in the eye
Skin Contact	Not a primary skin irritant	Not irritating to the skin when used as directed and good personal hygiene is practiced
Ingestion	Not orally toxic	Swallowing small quantities may cause nausea or diarrhea

Toxicity data are available. Call 513-841-8964 (Health Information)

CINCINNATI MILACRON

CIMSTAR® QUAL STAR®

MATERIAL SAFETY DATA SHEET

HAZARDS IDENTIFICATION (cont.)

When used in applications generating high levels of mist, operator exposure can be minimized by proper ventilation, use of mist collectors or splash guards, as appropriate. If there is doubt about actual mist levels present, monitoring should be conducted.

Mild skin irritation (redness and dryness of hands) may be experienced when the diluted product has been contaminated by certain oils, by dissolved metals or when mix ratio is too strong. When problems occur, use of water-resistant barrier creams may be a temporary control measure. Contact Cimcool Technical Services (513-841-8133) for specific recommendations.

Carcinogen Listings
NTP: No IARC: No OSHA: No

Signs and symptoms of exposure: Eye injury may result from contact with concentrated product. Skin irritation can result from improper use and handling of concentrate or mix.

Medical conditions generally aggravated by exposure: May aggravate existing skin irritation where further defatting or skin penetration could occur.

5. EMERGENCY AND FIRST AID PROCEDURES

Eyes -- In case of eye contact with concentrated product or diluted mix, flush immediately with running water for 15 minutes, then promptly get medical attention to check for possible irritation.

Skin contact-- In case of skin contact with product concentrate, wash with water as soon as possible.

Diluted product is not irritating to the skin when used as recommended and good personal hygiene is practiced. Remove severely contaminated clothing, including shoes. Launder before reuse. If irritation persists, get medical attention.

Ingestion-- If concentrate or mix is swallowed, **do not induce vomiting**. Dilute by drinking water or milk. Immediately contact physician and obtain treatment.

Swallowing small quantities of diluted product is not expected to cause injury or illness; but, as should be expected when drinking oily, soapy water, nausea, diarrhea or abdominal distress may be experienced.

Inhalation-- Not expected to be a probable route of exposure to product concentrate.

Inhalation of diluted mix can occur in applications where high mist levels are generated. OSHA has set a PEL of 15 mg/M^3 for any airborne particulate as a nuisance level of exposure.

6. FIRE AND EXPLOSION HAZARD DATA

Flash Point (COC)	NA
Flammable Limits	NA
Lower Explosive Limit	NA
Upper Explosive Limit	NA
Extinguishing Media	NA
Special Firefighting Procedures	None
Unusual Fire and Explosion Hazards	None
Hazardous Combustion Products	Smoke, fumes and oxides of carbon

NFPA/HMIS Codes

Health	1
Flammability	0
Reactivity	0
Other	NA

7. ACCIDENTAL RELEASE MEASURES

Contain the spill, collect on absorbent material and discard as dictated by Federal, state and local regulations that may apply. Flush area thoroughly with water.

Reportable Quantity ..... None

CINCINNATI MILACRON

CIMSTAR® QUAL STAR®

MATERIAL SAFETY DATA SHEET

8. WASTE DISPOSAL

For Used Mix: Disposal procedures must comply with local, county, state and Federal regulations. If pre-treatment is needed, chemical emulsion breaking or ultrafiltration may be used. Contact Cimcool Technical Services (513-841-8133) for assistance.

For Unused Concentrate: Concentrate is not a hazardous waste, as defined under 40 CFR 261.

Cimcool Technical Services (513-841-8133) can provide a list of waste haulers for your area.

"Empty" Containers will contain a residue which is not considered a hazardous waste under RCRA regulations. Drums can be drained to a "drip dry" condition by inversion and can be offered for recycling or scrap.

9. HANDLING AND STORAGE

Use only as recommended by CINCINNATI MILACRON. Avoid all contact of concentrate with eyes or skin. Do not swallow. If frozen, thaw completely at room temperature.

Other Precautions – Contains amines. Do not add sodium nitrite or other nitrosating agents to this product. Suspected cancer-causing nitrosamines could be formed.

10. CONTROL MEASURES

Respiratory Protection-- Product is not volatile

Ventilation-- For most applications, normal shop ventilation is adequate. However, when high mist levels are generated or where machines are close together or ventilation is inadequate, operators may experience respiratory irritation. For such applications, use of splash guards or mist collectors is recommended.

Protective Gloves-- Impervious gloves are required when handling product concentrate.

Eye Protection-- Safety shield or goggles required when handling concentrated product.

Other protective clothing or equipment-- Effective metalworking plant protective clothing as appropriate.

Work/Hygiene Practices-- Good personal hygiene should always be followed.

11. PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point	212° F
Specific Gravity	1.0017-1.0117
Vapor Pressure (mm Hg)	Like water
Melting Point	NA
Vapor Density	NA
Evaporation Rate	Like water
Solubility in Water	100% miscible
Appearance/Odor	Clear/chemical
pH (concentrate)	9.3-9.9
pH (5% mix)	8.8-9.2

12. REACTIVITY

Stability	Stable
Conditions to Avoid	NA
Materials to Avoid	Avoid addition of strong acids to product concentrate.
Hazardous Polymerization	Will not occur
Combustion Products	Smoke, fumes, oxides of carbon

13. TRANSPORT INFORMATION

DOT Proper Shipping Name	NA
ID Number	NA
DOT Hazard Classification	NA

U.S. Harmonized Tariff Schedule Code:
3403.19.50.00.5

CINCINNATI MILACRON

CIMSTAR® QUAL STAR® MATERIAL SAFETY DATA SHEET

14. REGULATORY INFORMATION

Exposure Guidelines

Regulated Material	OSHA PEL	OSHA STEL	ACGIH TLV	ACGIH STEL
Mineral oil (mist)	5 mg/M³	—	5 mg/M³	—
Ethanolamine	3 ppm	—	3 ppm	15 ppm

CERCLA
Components present in this product at a level which could require reporting under 40 CFR 302.4 ..... None

SARA TITLE III
Extremely Hazardous Substances (302) ....
NA

Hazardous Substances (311,312):
Product concentrate is a hazardous substance as defined under the OSHA Hazard Communication Standard and may be reportable under the provisions of SARA Sections 311 and 312.

SARA Hazard Categories

Acute Health	..... Yes
Chronic Health	..... No
Fire	..... No
Sudden Release of Pressure	..... No
Reactive	..... No

RCRA
Product concentrate does not meet the definition of a hazardous waste as defined under 40 CFR 261. It is possible that in use, the mix may be contaminated by metals or by chlorinated solvents and the final waste may meet the TCLP definition. Each facility should assess each waste stream to determine if the used fluid should be treated as a hazardous waste.

TSCA-- The ingredients of this product are on the TSCA inventory.

State Right-to-Know
Many states have enacted Community Right-To-Know laws which require information beyond that mandated by federal laws. Since some of these laws are inconsistent with the federal laws, the information in this sheet may not fully meet the requirements of every state.

California SCAQMD Rule 443.1 VOC's .. NA

Toxic Substances (313): Components present in the product at levels which could require reporting under the statute:

Chemical Name	CAS #	Max %
NA		

Glossary of Abbreviations

ACGIH American Conference of Governmental Industrial Hygienists
CAS ... Chemical Abstracts Service
CERCLA Comprehensive Environmental Response Compensation and Liability Act
CFR ... Code of Federal Regulations
COC ... Cleveland Open Cup
DOT ... Department of Transportation
IARC ... International Agency for Research on Cancer
NA .... Not Applicable
NTP ... National Toxicology Program
OSHA ... Occupational Safety and Health Administration
PEL .... Permissible Exposure Limit
RCRA ... Resource Conservation and Recovery Act
SARA ... Superfund Amendments and Reauthorization Act
SCAQMD . Southern California Air Quality Monitoring District
STEL .... Short-Term Exposure Limit
TCLP .... Toxicity Characteristics Leaching Procedure
TLV .... Threshold Limit Value
TSCA .... Toxic Substances Control Act
VOC .... Volatile Organic Chemicals

NOTE: The opinions expressed herein are those of qualified experts within CINCINNATI MILACRON and of their suppliers. We believe that the information contained herein is current as of the date of this Material Data Sheet. Since the use of this information and of these opinions and the condition and use of the product are not within the control of CINCINNATI MILACRON, it is the user's obligation to determine the conditions of safe use of the product.

This is the last page

USE ONLY AS RECOMMENDED

[illegible] not utilize this product without first [illegible] ferring to the Milacron PRODUCT INFORMATION FOLDER and the MSDS [illegible] the product.

DIRECTIONS FOR MIXING

1. Remove used metalworking f[illegible], metal chips, and swarf from machine or central system [illegible]rvoir.
2. Use CIMCLEAN® machine clean[illegible] to thoroughly clean the reservoir. Follow the directions on the cleaner label.
3. Add water and then add concentrate (see table below).
4. Stir or circulate to insure [illegible]orough mixing.

® REGISTERED TRADEMARK

RECOMMENDED USE DILUTIONS

USE AT 1:25 (4.0%) TO 1:15 (6.7%) FOR MACHINING AND GRINDING OF FERROUS AND NONFERROUS METALS.

The above recommended use dilutions are found acceptable by Cincinnati Milacron for proper performance in typical applications. As circumstances may vary, alternative dilutions may be required. In this regard, customer may contact an authorized Cincinnati Milacron technical representative.

NO WARRANTY IS MADE BY AUTHORIZED AGENT AS MAY BE EXPRESSLY STATED IN MILACRON'S SALES CONTRACT.

STORAGE CONSIDERATIONS AND CONTAINER DISPOSAL

Protect from freezing.
Do not reuse container before cleaning. After cleaning, remove label and relabel appropriately.

WARNING

CONCENTRATE IS ALKALINE. HARMFUL IF TAKEN INTERNALLY. CONCENTRATE IS AN EY[illegible] IRRITANT. Eye damage may occur from contact with concentrate. This product is not primary skin irritant; however, skin irritation may occur if used improperl[illegible] (concentrate or mix).

CAUTION: CONTAINS AMINES. DO NOT ADD SODIUM NITRITE OR OTHER NITROSATING AGENTS TO THIS PRODUCT. SUSPECTED CANCER-CAUSING NITROSAMINES COULD BE FORMED.

PRECAUTIONARY MEASURES

Use only as recommended by Cincinnati Milacron.
Avoid all contact of concentrate with eyes or prolonged skin contact.
Wear waterproof gloves, safety shield or goggles, and appropriate protective clothing when handling concentrate.
Do not swallow.

FIRST AID

IN CASE OF EYE CONTACT, flush immediately with running water for 15 minutes, then get prompt medical attention to check for possible irritation.
IN CASE OF SKIN CONTACT WITH CONCENTRATE, wash immediately with water.
IF CONCENTRATE OR MIX IS SWALLOWED, do not induce vomiting. Dilute with water or milk. Immediately contact physician and obtain treatment.

MILACRON

(513) 841 8181

CIMCOOL METALWORKING FLUIDS

SEMISYNTHETIC METALWORKING FLUID FOR MODERATE-DUTY MACHINING AND GRINDING APPLICATIONS

CIMCOOL® QUAL STAR

"A NEW-GENERATION SEMISYNTHETIC"

DESCRIPTION

As a new-generation semisynthetic fluid, CIMCOOL QUAL STAR uniquely blends the technological advantages of modern day synthetics with the performance capabilities of soluble oils.

CIMCOOL QUAL STAR metalworking fluid is a clean, completely water-soluble, *nonnitrite, nonphenolic, nonsilicone,* semisynthetic product, having exceptional corrosion and rancidity control. CIMCOOL QUAL STAR has a broad concentration range, 1:10 (10%)-1:30 (3.3%), which gives it the flexibility to fit many operations in the plant.

CIMCOOL QUAL STAR is exceptionally mild, which makes it an ideal product for individual machine applications where mixes tend to concentrate. CIMCOOL QUAL STAR can also be used in central system applications.

CIMCOOL QUAL STAR'S flexibility and broad operating range complements the new era of flexible manufacturing technology.

Easy to maintain and control. CIMCOOL QUAL STAR can be recycled for reuse by the CIMCOOL Full Cycle™ Module, or can easily be treated for disposal.

APPLICATION

Recommended for general-purpose machining and grinding of ferrous metals including carbon/cast steel, cast/nodular/malleable/gray iron, stainless steel, and high alloy steels. Can also be used on some light- to moderate-duty applications on nonferrous metals.

CINCINNATI MILACRON

CIMCOOL QUAL STAR

RECOMMENDED STARTING DILUTIONS

Use at 1:10 (10.0%) to 1:30 (3.3%) for machining and grinding of ferrous and some nonferrous metals.

CIMCOOL QUAL STAR is to be mixed with water for use (add concentrate to water). Add no other substances to the concentrate or mix unless approved by CIMCOOL Technical Services (1-800-On 2 time, or in Ohio 1-800-582-7522).

For concentration analysis, use the Mixed Indicator (MI) Titration Procedure, CIMCOOL "Mini" Kit I, or a refractometer.

TYPICAL PHYSICAL AND CHEMICAL PROPERTIES

Physical state	liquid
Appearance and odor	clear; chemical
Color	green, pink, undyed
Solubility in water	100%
Weight, lb/gal, 60°F (15.6°C)	8.28
Specific gravity (H_2O = 1)	0.993
Boiling point, °F (°C)	212 (100)
Flash point, COC, °F (°C)	none; self-extinguishing
Fire point, COC, °F (°C)	none; self-extinguishing
Extinguishing media	no fire hazard
Unusual fire & explosion hazards	none
Freezing point (or pour point), °F, (°C)	22 (-5.6)
If frozen, thaw completely at room temperature.	
pH, concentrate	9.5
pH, 1:30 (3.3%) mix, typical operating conditions	8.9
Total chlorine/chloride, wt %, calculated	0.143/0.002
Total sulfur, wt %, calculated	0.38
Phenols, phosphates, mercurials, nitrites, PCB's, PTBBA, diethanolnitrosamine, silicones	none

PACKAGING

Available in 5-gallon pails, 55-gallon drums, Liqua Bins, and in tank truck quantities.

Do not reuse container before cleaning. After cleaning, remove label and relabel appropriately.

DOT LABELING REQUIREMENTS

Hazardous Materials Description and Proper Shipping Name (49 CFR 172.101):	Hazard Class (49 CFR 172.101):
Not a hazardous material	Not applicable

FEATURES AND BENEFITS

EXCELLENT FERROUS CORROSION CONTROL

- Rust inhibitor package is extremely effective in preventing in-process rust on machines and parts.
- Very effective on cast/malleable/gray/nodular iron.
- Contains nonferrous corrosion inhibitors which prevent stain on aluminum alloys, brass, copper, and bronze.

SUPERIOR RANCIDITY CONTROL

- Effective protection against bacteria and mold.
- No "Monday Morning" odors. This ensures long fluid life, minimizes the use of additives, and increases operator satisfaction.

MULTI-PURPOSE PRODUCT

- CIMCOOL QUAL STAR can be used economically throughout the shop on light-, moderate-, and some heavy-duty operations; just vary the dilution to suit the job requirements.
- Liquid residue—keeps machine tool components free-moving regardless of equipment age.
- Excellent choice for individual machine applications.

EFFECTIVE LUBRICATION AND COOLING QUALITIES

- Physical and chemical lubricants provide good machining and grinding properties; keeps parts and tools cool.

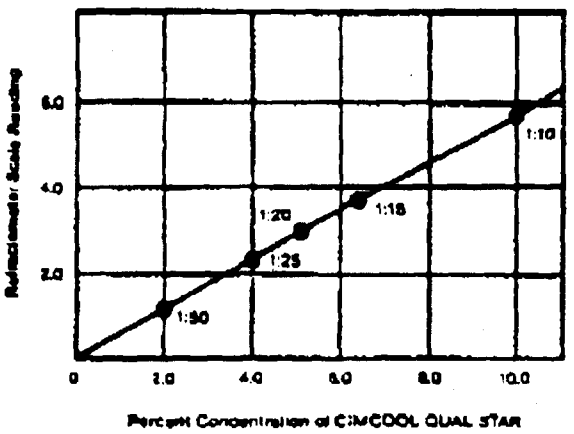
PLEASANT TO USE

- No smoke; no slippery film on parts, machines or floors; low misting; mild to the skin when used as recommended; no ammonia odors.

NITRITE-FREE. PHENOL-FREE. SILICONE-FREE.

Ask your local Cincinnati Milacron Distributor for a trial today.

Concentration Check For CIMCOOL QUAL STAR



CONCENTRATION

By using the American Optical Refractometer Fluid Tester, Model 10440, or the Atago Refractometer, Model SPR-N (refer to Conversion Chart at left).

INDUSTRIAL DISTRIBUTORS

Crisswell
Holtzman

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44-R1367

MATERIAL SAFETY DATA SHEET

Required under USDL Safety and Health Regulations for Ship Repairing, Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

SECTION I

MANUFACTURER'S NAME: Products Division/Cincinnati Milacron Marketing Co.	EMERGENCY TELEPHONE NO.: 513/841-8181
ADDRESS (Number, Street, City, State, and ZIP Code): 4701 Marburg Avenue, Cincinnati, OH 45209	
CHEMICAL NAME AND SYNONYMS: Not applicable (NA)	TRADE NAME AND SYNONYMS: CIMCOOL QUAL STAR
CHEMICAL FAMILY: NA	FORMULA: Complex mixture

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS	none		BASE METAL	none	
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS	none	
OTHERS	none				

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	212	SPECIFIC GRAVITY (H_2O=1)	0.993
VAPOR PRESSURE (mm Hg.)	NA	PERCENT, VOLATILE BY VOLUME (%)	NA
VAPOR DENSITY (AIR=1)	NA	EVAPORATION RATE (_____ =1)	like water
SOLUBILITY IN WATER	100%		
APPEARANCE AND ODOR	Clear; chemical		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method Used): None; self-extinguishing	FLAMMABLE LIMITS: NA	Lel	Uel
EXTINGUISHING MEDIA: No fire hazard			
SPECIAL FIRE FIGHTING PROCEDURES: NA			
UNUSUAL FIRE AND EXPLOSION HAZARDS: None			

(Continued on reverse side)

CIMCOOL QUAL STAR

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE
None established

EFFECTS OF OVEREXPOSURE
No harmful effects expected when used as recommended.

EMERGENCY AND FIRST AID PROCEDURES
SKIN: Flush with water. EYES: Flush with running water for 15 minutes. Call a physician. INGESTION: Do not induce vomiting. Dilute with water or milk. Call a physician. INHALATION: No first aid required; not volatile.

SECTION VI - REACTIVITY DATA

STABILITY			CONDITIONS TO AVOID
	UNSTABLE		
	STABLE	X	

INCOMPATABILITY *(Materials to avoid)*
Avoid contact of concentrate with strong acids.

HAZARDOUS DECOMPOSITION PRODUCTS
None

HAZARDOUS POLYMERIZATION			CONDITIONS TO AVOID
	MAY OCCUR		
	WILL NOT OCCUR	X	

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
Flush with water.

WASTE DISPOSAL METHOD
Ultrafiltration, acid-alum-polymer chemical treatment, or high temperature incineration.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION *(Specify type)*
Not required

VENTILATION		
	LOCAL EXHAUST	SPECIAL
	MECHANICAL *(General)*. General	OTHER

PROTECTIVE GLOVES
Not required

EYE PROTECTION
Safety goggles recommended when handling concentrate.

OTHER PROTECTIVE EQUIPMENT
Normal metalworking plant protective equipment.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING
None required.

OTHER PRECAUTIONS
See product label. Product labels for use in shop available to bulk users.

GREENE, BUCKLEY, JONES & MCQUEEN
ATTORNEYS AT LAW

SUITE 2600
230 PEACHTREE STREET, N.W.
ATLANTA, GEORGIA 30303
(404) 522-3541
FACSIMILE (404) 522-3677

JOHN DAVID JONES
C. RICHARD MCQUEEN
JOHN E. TALMADGE
JAMES C. FRENZEL
HAROLD S. WHITE, JR.
DANIEL A. ANGELO
F. C. SCHENCK
F. TAYLOR PUTNEY, JR.
EDWARD D. BUCKLEY III
MARGARET L. MILROY
J. RUSSELL PHILLIPS
WILLIAM D. MATTHEWS
B. KYLE CHILDRESS
H. LEE PRUETT
LESLIE C. RUITER
ROSE E. GOFF
HENRY M. PERLOWSKI

HARRY L. GREENE
(1906-1974)

OF COUNSEL
FERDINAND BUCKLEY

JACK F. WILLIAMS
(ADMITTED IN N.Y. ONLY)

MAILING ADDRESS
P.O. BOX 50440
ATLANTA, GA 30343

February 17, 1995

Andrea Madigan, Esq.
Regional Counsel
The Environmental Protection Agency
Region IV
Atlanta, GA

VIA HAND DELIVERY

Re: E.H. Mann, Inc., d/b/a Warrenton Rubber Company, Bankruptcy Case No. 89-10699-JSD, (the "Debtor"); A. Stephenson Wallace, Trustee (the "Trustee"); EPA ID No. GAD-984321513, 101 Flower Street, Warrenton, GA 30828 (the "Site")

Dear Andrea:

As you are aware, we are special counsel for the Trustee with regard to the Site of the Debtor as above-captioned. At your request, we have accumulated in the attached notebook copies of documents with regard to the environmental assessment of the Site beginning with 1990 through the attempted sale of the Site in 1994. As you are aware, the sale has not been forthcoming and the Trustee has filed a Motion for Authority to Abandon the Site.

When we were initially contacted by the Trustee for the Debtor, a review of the 1992 GSC environmental report, and a later review of the 1990 OHM report, raised more questions than were answered. Those reports lacked analytical data to support the more serious environmental concerns raised. We subsequently engaged a chemical consultant, Brian E. Bovard, and an environmental engineering firm, Atlanta Testing & Engineering, to review the original work and conduct investigations of their own. This subsequent work determined that the Site does not have environmental problems warranting state and/or federal clean up activity. The Site, although not pristine, is not a threat to public health and safety as it is presently constituted. Further, all potentially hazardous waste materials have now been removed from the Site as indicated.

The Brian Bovard referenced in the enclosed materials is an environmental consultant employed by the Trustee who works from our office and can be reached at my telephone number.

The production of correspondence to and from our client as well as to other attorneys or parties interested in the Site is not intended to waive the attorney/client privilege or the work product privilege of the clients involved or their law firms. The production of these documents at your request, except to the extent as contained in these documents, is with full reservation of the client's right to assert the attorney client privilege and work product privilege which may attach to documents, memoranda, or other materials prepared with regard to this Site.

If you have any questions concerning what we have voluntarily produced pursuant to your request, please feel free to contact either the Trustee, Steve Wallace, the undersigned or Brian Bovard as indicated.

Sorry for the brief delay in accumulating into one reference document for your convenience these materials.

Best personal regards.

Sincerely,

James C. Frenzel

JCF/tc

cc: (w/o enclosure)
A. Stephenson Wallace, Esq.
Mr. Brian E. Bovard
H. Derrick Peterson, Esq.

02657\00001\tc9766

E. H. MANN - DOCUMENT SEQUENCE

1. AER Drum\product removal invoices

2. ATE Assessment Report 10/4/93

3. AER 8/23/93 drum inventory

4. JCF 5/27/93 letter to S. Wallace with BEB memo 5/26/93 site visit report

5. EPA ID number/application

6. BEB 7/20/93 memo on OHM reported soil contamination

7. OHM Phase II report

8. BEB 7/9/93 memo on Ga. Spill/Release Act. + MSDS "CPO 100 VIS OIL"

9. JCF 4/23/93 letter to Steve Wallace with
   (a) Derrick Paterson memo 4/16/93 on OHM report
   (b) BEB 4/23/93 memo on Product Usage at site

10. JCF 3/18/93 letter to Steve Wallace with BEB memo 3/18/93 on environmental concerns at site.

11. GSC Phase I report

02657\00001\tc9760

Warrenton Rubber Company,
Warrenton, GA

E. H. MANN - DOCUMENT SEQUENCE

1. AER Drum\product removal invoices

2. ATE Assessment Report 10/4/93

3. AER 8/23/93 drum inventory

4. JCF 5/27/93 letter to S. Wallace with BEB memo 5/26/93 site visit report

5. EPA ID number/application

6. BEB 7/20/93 memo on OHM reported soil contamination

7. OHM Phase II report

8. BEB 7/9/93 memo on Ga. Spill/Release Act.

9. JCF 4/23/93 letter to Steve Wallace with
   (a) Derrick Paterson memo 4/16/93 on OHM report
   (b) BEB 4/23/93 memo on Product Usage at site

10. JCF 3/18/93 letter to Steve Wallace with BEB memo 3/18/93 on environmental concerns at site.

11. GSC Phase I report

02657\00001\tc9760

Alternate Energy Resources Inc.
2730 Walden Dr. Augusta, GA 30904
(706) 738-1571 FAX (706) 738-1581

invoice

GA02011
Bush & Wallace, P.C.
ATTN: ACCOUNTS PAYABLE
462 Telfair Street
Augusta GA 30901

Ship To/Remarks
Chapter 7 Case #89-10699
location:Warrenton Rubber site
NET DUE UPON RECEIPT

DATE	NO.	PAGE	DUE DATE
12/31/93	11347	1	12/31/93

REFERENCE #	DESCRIPTION		AMOUNT
F/B Drum Disposal Item #: 08 2 drums waste naphtha (dm #'s 16 and 11)	2.0	@ 95.0000/Drum ✓	190.00 ✓
F/B Drum Disposal Item #: 08 3 drums waste flammable liquid (toluene) (dm #'s 71, 100, 14)	3.0	@ 95.0000/Drum ✓	285.00 ✓
C/O Drum Disposal tem #: 05 1 drum corrosive liquid (dm #56)	1.0	@ 275.0000/Drum ✓	275.00 ✓
F/B Drum Disposal Item #: 08 2 drums chlorinated waste oil (dm #'s 22 & 26)	2.0	@ 95.0000/Drum ✓	190.00 ✓
F/B Drum Disposal Item #: 08 2 small drums waste grease (dm #'s 54, 61)	2.0	@ 75.0000/Drum ✓	150.00 ✓
W/O Drum Disposal Item #: 06 1 drum waste oil (dm #58)	1.0	@ 40.0000/Drum ✓	40.00 ✓
C/O Drum Disposal Item #: 05 1 drum non regulated material (liquid boiler Rx - dm #74)	1.0	@ 40.0000/Drum ✓	40.00 ✓

SUB-TOTAL	
TAX	
TOTAL	
NET TO PAY	

Alternate Energy Resources Inc.
2730 Walden Dr. Augusta, GA 30904
(706) 738-1571 FAX (706) 738-1581

invoice

GA02011
Bush & Wallace, P.C.
ATTN: ACCOUNTS PAYABLE
462 Telfair Street
Augusta GA 30901

Ship To/Remarks
Chapter 7 Case #89-10699
location:Warrenton Rubber site
NET DUE UPON RECEIPT

	DATE	NO.	PAGE	DUE DATE
12/31/93	11347		2	12/31/93

REFERENCE #	DESCRIPTION			AMOUNT
	F/B Drum Disposal Item #: 08 2 drums non regulated material (solid boiler Rx dm #7.. 73A)	2.0	@ 425.0000/Drum ✓	850.00 ✓
	F/B Drm.Handling Chg Item #: 34 38 empty drums in good condition for disposal	38.0	@ 10.0000/Drum ✓	380.00 ✓
	F/B Drm.Handling Chg Item #: 34 14 empty drums in poor condition for disposal	14.0	@ 20.0000/Drum ✓	280.00 ✓
	F/B Lab Profiling Item #: 26 Analysis of 17 composited samples	17.0	@ 50.0000/Each ✓	850.00 ✓
	F/B Drm Label Charge Item #: 38 14 labels for drums	14.0	@ 2.0000/Drum ✓	28.00 ✓
	F/B Lab Analysis Item #: 22 Lab analysis on material after arrival	1.0	@ 165.0000/Each ✓	165.00 ✓
	F/B Transportation Item #: 50 85 miles transportation charge	85.0	@ 2.0000/Mile ✓	170.00 ✓
	Labor - loading drums Item #: 70 7 hours labor (9:30 AM-4:30 PM)	7.0	@ 75.0000/ea ✓	525.00 ✓

SUB-TOTAL	
TAX	
TOTAL	
NET TO PAY	

Alternate Energy Resources Inc.
2730 Walden Dr. Augusta, GA 30904
(706) 738-1571 FAX (706) 738-1581

invoi

GA02011
Bush & Wallace, P.C.
ATTN: ACCOUNTS PAYABLE
462 Telfair Street
Augusta GA 30901

Ship To/Remarks
Chapter 7 Case #89-10699
location:Warrenton Rubber si
NET DUE UPON RECEIPT

	DATE	NO.	PAGE	DUE DATE
12/31/93	11347		3	12/31/93

REFERENCE #	DESCRIPTION		
	S. C. Waste Management Fee	3639.0 @ 0.0050/lb ✓	18.20 ✓
	Item #: [illegible]		
	S.C. fee based on $10.00/ton		
	[illegible]		

SUB-TOTAL	4436.20
TAX	
TOTAL	
NET TO PAY	4436.20

Alternate Energy Resources Inc.
2730 Walden Dr. Augusta, GA 30904
(706) 738-1571 FAX (706) 738-1581

invoice

GA02011
Bush & Wallace, P.C.
ATTN: ACCOUNTS PAYABLE
462 Telfair Street
Augusta GA 30901

Ship To/Remarks
P.O. #
12/09/93
NET DUE UPON RECEIPT

DATE	NO.	PAGE	DUE DATE
12/21/93	11301	1	12/21/93

REFERENCE #	DESCRIPTION			AMOUNT
	C/O Bulk Disposal Item #: 01 1250 Gals. Waste Petroleum Oil, Combustible Liquid	1250.0	@ 0.4500/Gal ✓	562.50
	C/O Lab Analysis Item #: 19 Lab Analysis Charge on Material	1.0	@ 110.0000/Each ✓	110.00
	C/O Transportation Item #: 47 85 Miles Transportation Charge	85.0	@ 2.0000/Mile ✓	170.00
	C/O Pumping Charge Item #: 39 3 Hours' Pumping Charge	3.0	@ 75.0000/Hour ✓	225.00
	S. C. Waste Management Fee Item #: 68 SC fee based on $10.00/ton	3485.0	@ 0.0050/lb ✓	17.43
	AER MANIFEST #31382			
	Material from Warrenton Rubber (E.H. Mann, Inc.), 101 Fowler St., Warrenton GA			

SUB-TOTAL	1084.93
TAX	0.00
TOTAL	1084.93
NET TO PAY	1084.93

Alternate Energy Resources Inc.
2730 Walden Dr. Augusta, GA 30904
(706) 738-1571 FAX (706) 738-1581

Invoice

GA02011
Bush & Wallace, P.C.
ATTN: ACCOUNTS PAYABLE
462 Telfair Street
Augusta GA 30901

Ship To/Remarks
CHAPTER 7 CASE #89-10699
05/31/94
NET DUE UPON RECEIPT

DATE	NO.	PAGE	DUE DATE
06/20/94	11847	1	06/20/94

REFERENCE #	DESCRIPTION		AMOUNT
F/B Drum Disposal Item #: 08 1 Drum Waste Flammable Liquid (Petroleum Distillates)	1.0	@ 95.0000/Drum	95.00
F/B Drum Disposal Item #: 08 1 Drum SOLID Material Manifested on line 11a. - contained Cans of Solid Paint	1.0	@ 425.0000/Drum	425.00
Drum Overpac Surcharge Item #: 66 1 Overpack supplied by AER for Flammable Liquid Drum	1.0	@ 65.0000/ea	65.00
F/B Empty Drum Sales Item #: 14 1 Empty (55-gal.) Drum to contain Solid Material	1.0	@ 30.0000/Each	30.00
F/B Lab Profiling Item #: 26 Lab Profiling Fee on Flammable Liquid	1.0	@ 50.0000/Each	50.00
C/O Drum Disposal Item #: 05 1 Drum (30 Gals.) Waste Corrosive Liquid (Caustic)	1.0	@ 275.0000/Drum	275.00
F/B Drum Disposal Item #: 08 2 Drums Waste Petroleum Oil, Combustible Liquid	2.0	@ 40.0000/Drum	80.00

SUB-TOTAL	
TAX	
TOTAL	
NET TO PAY	

Alternate Energy Resources Inc.
2730 Walden Dr. Augusta, GA 30904
(706) 738-1571 FAX (706) 738-1581

GA02011
Bush & Wallace, P.C.
ATTN: ACCOUNTS PAYABLE
462 Telfair Street
Augusta GA 30901

Ship To/Remarks
CHAPTER 7 CASE #89-10699
05/31/94
NET DUE UPON RECEIPT

DATE	NO.	PAGE	DUE DATE
06/20/94	11847	2	06/20/94

REFERENCE #	DESCRIPTION			AMOUNT
	W/O Empty Drum Sales Item #: 12 Sale of 2 Empty Drums for Waste Oil	2.0	@ 30.0000/Each	60.00
	F/B Drm.Handling Chg Item #: 34 Disposal of 2 Empty Drums	2.0	@ 10.0000/Drum	20.00
	F/B Lab Analysis Item #: 22 Lab Analysis Charge on Incoming Drums	1.0	@ 110.0000/Each	110.00
	F/B Transportation Item #: 50 85 Miles Transportation Charge	85.0	@ 2.0000/Mile	170.00
	S. C. Waste Management Fee Item #: 68 SC fee based on $10.00/ton	2077.0	@ 0.0050/lb	10.39
	AER MANIFEST #40500			
	Material from Warrenton Rubber			

	1390.39
SUB-TOTAL	0.00
TAX	1390.39
TOTAL	
NET TO PAY	1390.39

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GAD984321512 — Manifest Document No. 40500
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Warrenton Rubber
Bush & Wallace/462 Telfair St. , Augusta , GA 30901
4. Generator's Phone (706) 722-7574

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

5. Transporter 1 Company Name: Alternate Energy Resources, Inc
6. US EPA ID Number: GAD033582461
C. State Transporter's ID
D. Transporter's Phone (706)738-1571

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
Alternate Energy Resources, Inc
2730 Walden Drive
Augusta , GA 30904
10. US EPA ID Number: GAD033582461
G. State Facility's ID
H. Facility's Phone (706)738-1571

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Flammable Liquid, n.o.s., 9, UN1993, "PG-III", RQ 100# (Petroleum Distillates)	X	2	DM	110	G	D001
b.	Waste Corrosive Liquid, n.o.s., (Caustic), 8, UN1760, "PG-I", RQ-100# (Residudal Product - Caustic)	X	1	DM	55	G	D002
c.	Waste Petroleum Oil, Combustible Liquid, UN1270, "PG-III"	X	2	DM	110	G	
d.	Empty Drums		2	DM			

J. Additional Descriptions for Materials Listed Above
K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information: Emergency Response Phone Number (803)552-8306

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.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: BANKRUPTCY Trustee JOHN SCHNORBACH FOR STEVE WALLACE
Signature: John R. Schnorbach for Steve Wallace, Bankruptcy Trustee
Month Day Year: 05 31 94

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: James Key
Signature: James Key
Month Day Year: 5 31 94

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

Alternate Energy Resources Inc.
2730 Walker Dr. Augusta GA 30904
(706) 738-1571 FAX (706) 738-1581

GA02011
Bush & Wallace, P.C.
ATTN: ACCOUNTS PAYABLE
462 Telfair Street
Augusta GA 30901

Ship To/Remarks
CASE #89-10699
WARRENTON RUBBER LOCATION
03/23/94;NET DUE UPON RECPT

DATE	NO	PAGE	DUE DATE
03/31/94	11614	1	03/31/94

REFERENCE #	DESCRIPTION		AMOUNT
C/O Bulk Disposal Item #: 01 700 Gals Waste Flammable Liquid	700.0	@ 0.8500/Gal	595.00
C/O Lab Analysis Item #: 19 Lab Analysis on Load	1.0	@ 110.0000/Each	110.00
C/O Transportation Item #: 47 85 Miles Transportation Charge	85.0	@ 2.0000/Mile	170.00
S. C. Waste Management Fee Item #: 68 SC fee based on $10.00/ton	2640.0	@ 0.0050/lb	13.20

Pumpout of UST's at Warrenton Rubber location

AER MANIFEST #40278

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1

To Chuck Prado	From Steve Wallace
Co.	Co
Dept	Phone #
Fax # 404-522-3677	Fax # 706-722-6189

SUB TOTAL	888.20
TAX	0.00
TOTAL	888.20
NET TO PAY	888.20

TABLE 2

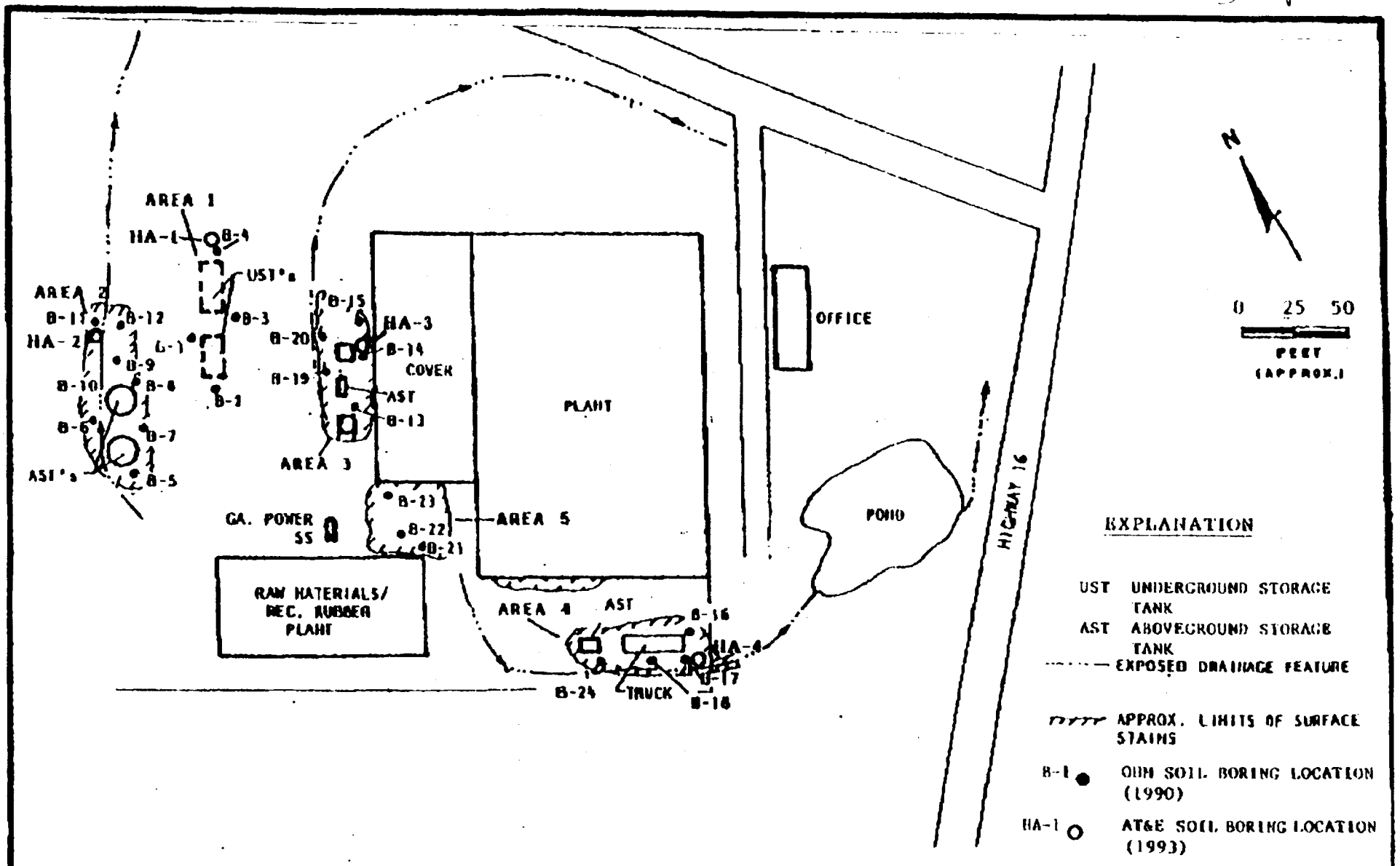
SUMMARY OF SELECTED SOIL AND GROUNDWATER ANALYSES
FORMER WARRENTON RUBBER COMPANY SITE
WARRENTON, GEORGIA
AT&E Job No. 12452, Report No. 82031

Location	Area 1		Area 2			Area 3		Area 4	
Boring	B-4	HA-1	B-11	HA-2		B-14	HA-3	B-17	HA-4
Date	3/28/90	8/17/93	3/28/90	8/17/93	9/1/93	3/28/90	8/17/93	3/28/90	8/17/93
Water Table Depth (ft)	2.3	>7.5	2	>7.5	5.4	±1.5-4	6.25	>5	>7.5
Soil Sample Depth (ft)	4	7.0-7.5	7	7.0-7.5		4	3.5-4.0	5	7-7.5
PID Reading (ppm)	--	0	--	0	--	--	0	--	0
TPH-9073[1]	1300	--	3810	--	--	1920	--	1240	--
Total Petroleum Hydrocarbons (as)	--	89	--	130	--	--	60	--	29
TPH-8015[2]	--	4	--	<2	--	--	<2	--	4
TPH-8100[3]	--	85	--	130	--	--	60	--	25
PAH[3]	--	BDL	--	BDL	--	--	BDL	--	BDL
VOC[4] (ppb) in groundwater	--	--	--	--	BDL	--	0.5 1,1-DCA[5]	--	--

Notes: All concentrations in ppm, unless otherwise noted.

1. TPH by Method 9073
2. TPH by Method 8015 (purge and trap) for volatile TPH components.
3. TPH and PAH by Method 8100, for non-volatile heavier TPH components (diesel-oil range).
4. Volatile organic analyses by Method 601/602.
5. 1,1-Dichloroethane, all other parameters BDL.

Abbreviations: BDL = below method detection limit
-- = not analyzed



SOURCE: MODIFIED FROM OHM CORP., PROJ. NO. 8737, PHASE II SOIL ASSESSMENT, KEARNEY-NATIONAL, INC., MAY 23, 1990.

DATE	DRAWN BY	CHECKED BY	SCALE	JOB NO	FIG. NO.
10/04/93	CLG			12452	1

atlanta testing & engineering

Florida • Georgia • Carolinas

BORING LOCATION MAP

FORMER WARRENTON RUBBER CO. SITE

WARRENTON, GEORGIA

LDI REPRODRINTING CENTER

atlanta testing
& engineering
11420 johns creek parkway / duluth, georgia 30136 / (404) 476-3555

October 4, 1993

Mr. Steve Wallace
Bush & Wallace
462 Telfair Street
Augusta, Georgia 20901

Re: Submittal of Report of Additional
Environmental Assessment
Former Warrenton Rubber Company Site
Warrenton, Georgia
AT&E Job No. 12452

Dear Mr. Wallace:

Atlanta Testing & Engineering (AT&E) is pleased to submit the accompanying report for your review. We appreciate the opportunity to assist Bush & Wallace and Greene, Buckley, Jones & McQueen with the environmental concerns of the Warrenton site.

If you have any questions concerning the report or any other aspects of the project, please contact me.

Respectfully submitted,

ATLANTA TESTING & ENGINEERING

Curt Gorman

Curt Gorman, P.G.
Manager of Remediation Services
Reg. Ga. 671

CG/jk

Attachments

cc: Mr. Jim Frenzel, Esq.

REPORT OF ADDITIONAL ENVIRONMENTAL ASSESSMENT

FORMER WARRENTON RUBBER COMPANY SITE

Warrenton, Georgia

AT&E Job No. 12452, Report No. 82031

Prepared for:

Mr. Steve Wallace
Bush & Wallace
462 Telfair Street
Augusta, Georgia 20901

Prepared by:

Atlanta Testing & Engineering
11420 Johns Creek Parkway
Duluth, Georgia 30136

October 4, 1993

TABLE OF CONTENTS

Page

1.0 INTRODUCTION 1

1.1 Background 1
1.2 Purpose and Scope 1

2.0 METHODS OF INVESTIGATION 2

2.1 Soil Borings 2
2.2 Environmental Sampling and Analysis 2

2.2.1 Soils 2
2.2.2 Groundwater 2

2.3 Decontamination 2

3.0 FINDINGS 4

3.1 Soil Borings 4
3.2 Environmental Results 4

3.2.1 Soil Quality 4
3.2.2 Groundwater Quality 4

APPENDICES

APPENDIX A - Tables and Figures

APPENDIX B - Laboratory Reports

TABLES

1. Geologist Logs of Hand-Auger Borings Completed August 17, 1993

2. Summary of Selected Soil and Groundwater Analyses

FIGURES

1. Boring Location Map

1.0 INTRODUCTION

1.1 Background

The subject site is located on Highway 16 in Warrenton, Georgia, and was formerly operated as the Warrenton Rubber Company. The site is presently unoccupied. The area of concern includes the outside plant support operations. These operations included an underground storage tank (UST) area (Area 1), and aboveground storage tank (AST) areas (Areas 2, 3 and 4). The plant facilities and areas of concern are shown on Figure 1.

Information was provided by Greene, Buckley, Jones & McQueen (GBJ&M) regarding previous environmental investigation completed at the site by OHM Corporation in 1990. This information indicated the occurrence of TPH concentrations in soil ranging from below detection limits (BDL) to 3810 ppm from a total of 34 samples. Purgeable halocarbon analysis of nine soil samples indicated all parameters were BDL, except for the occurrence of tetrachloroethylene (564 ppb) in one sample.

Based on the evaluation of the above data by GBJ&M, additional environmental assessment was warranted.

1.2 Purpose and Scope

The purpose of additional assessment was to validate previously reported significant TPH concentrations of selected soil samples in the vicinity of previous soil boring locations. The QA/QC of the previous analysis of these samples was suspect since they were collected below the water table, and/or may have been subject to positive interference associated with the analytical methodology (Method 418.1 or 9073) then used. In addition, it was desired to assess if potential impact to groundwater quality had occurred.

The approved work scope consisted of the following:

- Attempt to collect water table samples from four shallow borings near B-4, B-11, B-14 and B-17/B-18 (areas previously identified with highest TPH levels).
- Screen soil cuttings with an organic vapor analyzer (OVA).
- Analyze the water samples for Method 601/602.
- Analyze selected soils by more complete and accurate methodology including light-end (gasoline-TPH) components as well as heavier-end (diesel/oil) TPH components by gas chromatography (GC) by Methods 8015/8100.
- Prepare a brief report presenting the field methods, boring logs, analytical data, and findings.

A second site visit was required following evaluation of the initial site visit results. The additional work scope was approved by GBJ&M and Bush & Wallace before field work was initiated.

2.0 METHODS OF INVESTIGATION

2.1 SOIL BORINGS

Four hand-augered soil borings were completed from 6.5 to 7.5 feet below land surface (bls). As shown on Figure 1, the borings were completed adjacent to previous borings B-4 in Area 1 (HA-1), B-11 in Area 2 (HA-2), B-14 in Area 3 (HA-3) and B-17 in Area 4 (HA-4).

2.2 ENVIRONMENTAL SAMPLING AND ANALYSIS

2.2.1 Soils

Soils were screened every 0.5 to 1.0 feet for volatile organic vapors with a photoionization detector (PID). All PID readings of soils were at or below background levels, therefore PID results were not used to select samples for laboratory submission. Soil samples were obtained for analysis from the base (7 to 7.5 feet bls) of unsaturated borings HA-1, HA-2, and HA-4. Since groundwater occurred at a depth of 6.25 feet bls in HA-3, and the previous assessment indicated significant TPH concentrations (1920 ppm) at 4 feet bls in adjacent boring B-17, the soil sample from 3.5 to 4 feet bls was submitted to the laboratory for analysis.

Soil samples were placed in appropriate containers and stored on ice for delivery to Microbac Laboratories, Inc., Atlanta, Georgia. All soil samples were analyzed for TPH by GC Methods 5030/8015 for volatile (gasoline) petroleum components, and 3550/8100 for heavier (diesel-oil) petroleum components. In addition, individual polynuclear aromatic hydrocarbon (PAH) compounds were analyzed by Method 8100.

2.2.2 Groundwater

On August 17, 1993, only HA-3 had an adequate column of groundwater to sample from the open borehole. Therefore, a groundwater sample was obtained with a disposable PVC bailer, and submitted for analyses for purgeable halocarbons and aromatics, which include benzene, toluene, ethylbenzene, and xylenes (BTEX), and volatile chlorinated hydrocarbons, by GC Methods 601 and 602.

Since an oily sheen had been observed on a bailer following an attempt to obtain a groundwater sample from HA-2, a second site visit was scheduled. On September 1, 1993, the water level in HA-2 had risen enough to provide an adequate volume of water to sample. No oily sheen was observed on the bailer or water sample, and the sample was submitted for Method 601/602 analyses.

2.3 DECONTAMINATION

Prior to hand-augering and between borings, the stainless steel hand auger bucket coming in contact with the formation was decontaminated. In addition, all environmental sampling equipment and measuring devices placed in boreholes were decontaminated between samples or measurements in the following sequence:

- Washed with Alconox detergent and/or steam-cleaned;
- Rinsed with deionized water;
- Rinsed with pesticide-grade isopropyl alcohol;
- Rinsed with deionized water;
- Air dried.

3.0 FINDINGS

3.1 SOIL BORINGS

Based on hand auger cuttings from the four borings, the surficial soil of the site consisted of a dry, fine to coarse sand, which extends to a depth of 2 to 3 feet below land surface (bls). Underlying the sand is a dry, slightly to moderately sandy clay, which has increasing moisture content until the boring completion depths of 7.5 feet (see Table 1, Geologist Logs).

On the day of boring completion, only boring HA-3/Area 3 (6.25 ft. bls) intercepted the water table. The hot, dry summer weather had resulted in a significant drop in the water table from that of the spring, 1990, when water levels in nearby borings ranged from approximately 2 to 6 feet (see Table 2). The water table had risen to 5.4 ft. bls in HA-2/Area 2 during the second site visit on September 1, 1993.

3.2 ENVIRONMENTAL RESULTS

3.2.1 Soil Quality

Soil screening with a PID indicated no volatile organic readings above background (see Table 1). TPH concentrations for volatile TPH components (Method 8015) ranged from levels below detection limits (BDL) to 4 ppm, indicating no significant contamination from volatile petroleum products (see analytical summary on Table 2). However, TPH concentrations from heavier petroleum products (Method 8100) range from 25 ppm at HA-1/Area 1 to 130 ppm at HA-2/Area 2. As indicated in the laboratory reports, the TPH-8100 results are generally associated with a light to medium oil. These results are consistent with known plant activities, which included storage of processing oil in ASTs in Area 2, 3, and 4.

Evaluation of the soil TPH data summarized on Table 2 indicates significant TPH concentration reduction from the previous assessment (1990) when compared to the current assessment. The higher TPH concentrations of the previous assessment are not as reliable as the current previous assessment results based on the following: (1) positive-matrix interference which is possible with the TPH 9073 Method; (2) samples were generally taken below the water table, which can produce positive interference if not properly dried; (3) samples are not indicative of vadose zone soil quality when collected below the water table; and (4) the 8015/8100 GC Method is more reliable than Method 9073.

Therefore, based on the more reliable current soil quality data, while some soil contamination has occurred on site, it is consistent with the known petroleum products stored at the plant. In addition, based on observed water quality results, the site soil contamination has not impacted state or federal groundwater quality standards.

3.2.2 Groundwater Quality

Groundwater samples from HA-2 and HA-3 were BDL for all constituents except 1,1-Dichloroethane (1,1-DCA) in HA-3 at 0.5 ppb (which is the detection limit). Based on the above results, and the fact that only heavier petroleum products were known to have been stored at the plant facilities, there is little likelihood of VOCs occurring in site groundwater. The trace concentration of 1,1-DCA is not indicative of significant VOC occurrence, and does not warrant additional assessment based on known site activities.

TABLE 1

GEOLOGIST LOGS OF HAND-AUGER BORINGS COMPLETED AUGUST 17, 1993
FORMER WARRENTON RUBBER COMPANY SITE
WARRENTON, GEORGIA
AT&E Job No. 12452, Report No. 82031

Boring No.	Depth (ft.)	PID Reading (ppm)	Description
Area 1 - HA-1	0-2.5	0	Light brown; fine to medium sand; dry.
	2.5-7.5	0	Brown to dark brown; sandy clay, fine to coarse; dry with increasing saturation with depth, no groundwater at time of boring.
Area 2 - HA-2	0-2	0	Light to dark brown; fine to coarse sand; dry.
	2-7.5	0	Brown to dark brown; clay, some sand; dry, becoming wet with depth, trace groundwater at time of boring; oily sheen on bailer.
Area 3 - HA-3	0-2	0	Black, reddish-brown; fine to coarse gravelly sand; dry.
	2-6.5	0	Mottled grey and red; clay, some sand; dry to saturated with depth, groundwater 6.25 feet below ground surface.
Area 4 - HA-4	0-3	0	Light brown to brown; fine to coarse sand; dry.
	3-7.5	0	Brown, grey; clay, some sand; dry to wet at depth, no groundwater at time of boring.

Alternate ENERGY Resources Inc. Energy for Industry

2730 WALDEN DRIVE • AUGUSTA, GEORGIA 30904 • 1/706/738-1571 • FAX 706/738/1581

Waste Oils
Industrial Fuel
Solvent Recycling

August 23, 1993

Mr. Brian Bovard
3058 Paces Station Ridge
Atlanta, Georgia 30339

Dear Brian:

Here is the inventory of the drums at Warrenton Rubber. Most of the drums are rusted and many of them are open. The samples we obtained were from drum #'s 4, 12, 26, and 49. I do not have the complete results from the lab yet on those samples but should have them very soon.

Drum #

BEHIND MAIN BUILDING

#1 empty Empty drum; no material
#2 oil/H2O labeled Ind Chem; drum is open, no labels, probably naphtha or toluene with water
#3 oil/H2O open drum; half full; rain water and unknown (?)
#4 oil/H2O same as #3; open drum; water, toluene ?, etc.
#5 oil/H2O open and badly dented; half full; water and unknown
#6 toluene labeled toluene, flammable liquid; full?; sitting upside 2down
#7 oil/H2O labeled toluene, flammable liquid; open; maybe some rain water; rusted out on top; full of material
#8 empty partially full; open; rusted; labeled toluene, flammable liquid; probably some water
#9 oil/H2O closed drum; may be leaking on bottom; toluene or oil with toluene ?
#10 min. sp. full; closed; VM&P naphtha, flammable liquid UN1255
#11 min. sp. same as #10
already tested - #12 oil/H2O full; open; unknown material, rain water?, toluene?, naphtha?
#13 oil/H2O open; full; rusted out on top; unknown, toluene?, naphtha?, water?
#14 toluene unknown; full; closed drum with valve attached
#15 oil/H2O full; dirty oil and liquid on top of drum; unknown material
#16 empty Hydrosteam; liquid steam cleaner; 35-gallon drum
#17 oil/H2O VM&P naphtha and water; open
#18 empty labeled naphtha; EMPTY drum (rusted out on bottom)
#19 oil/H2O open; toluene and water; maybe 1/3 full
#20 oil/H2O open; full; VM&P naphtha, flammable liquid and water
#21 oil/H2O same as #20

IN PAINT SHACK

#22 chlor. oil Surett fluid; half full
#23 oil/H2O Exxon oil; full
#24 oil/H2O Exxon oil; may be half full; product on top of drum; open

Mr. Brian Bovard
Page 2

BESIDE PAINT SHACK (OUTSIDE)

#25 oil/H2O Exxon NUTO H-68 oil; full
Already tested #26 chlor. oil Surett fulid and water?; open; full
#27 empty Exxon NUTO H-68 oil; almost empty; open and upside down

BEHIND MAIN BUILDING (TO RIGHT OF PAINT SHACK)

#28 oil/H2O full; pinhole in top of drum; water and oil (NUTO H-68)
#29 solids INDUSTRIAL SOLID WASTE (valve stems)
#30 oil/H2O full; water and oil (NUTO H-68)
#31 solids solid material; half full; lids, rust, and some liquid
#32 oil/H2O open drum; full; trash and rain water

DRIVEWAY BEHIND MAIN BUILDING

#33 empty EMPTY drum
#34 oil/H2O full; open; unknown
#35 solids empty drum labeled toluene; open top
#36 empty empty drum with sediment
#37 oil/H2O small amount water and sediment
#38 0 BTU unknown solids, drum on side, may be INDUSTRIAL WASTE (plastic, etc.)
#39 0 BTU same as #37
#40 solids about 5 gallons solid material; open to air
#41 solids same as #40

UST AREA

#42 oil/H2O toluene and water; 1/4 full;
#43 empty EMPTY drum (on its side); labeled toluene
#44 empty EMPTY; same as #43
#45 empty EMPTY; naphtha label
#46 empty EMPTY; toluene label

ABOVEGROUND STORAGE TANK AREA

#47 empty EMPTY; labeled oil
#48 empty some unknown liquid (drum laying on side)

OUTSIDE MIXING BUILDING (LEFT SIDE OF BUILDING)

Already tested #49 oil/H2O full; open; rain water and unknown
#50 oil/H2O full; Exxon Teresstic and water
#51 oil/H2O open; VM&P naphtha and oil; full

Mr. Brian Bovard
Page 3

INSIDE MIXING BUILDING (LOWER LEVEL)

MSDS requested 8/31 → #52 oil/H_2O Garnet II compressor oil (20-gallon drum that is 1/4 to 1/3 full); manufactured by LuBest

MSDS requested 8/24 → #53 grease Exxon Unival T-60 grease (solid) UNIVOLT 60

→ #54 grease Titan 993 (LuBest); 5-gallon grease (full) TITAN 999

INSIDE MIXING BUILDING (UPPER LEVEL)

#55 empty unknown residual, otherwise EMPTY
#56 corrosive plastic drum; corrosive liquid (MCP-25) 55-gallon drum approximately half full
#57 oil/H_2O open pail 1/3 full (oil and grease and unknown)
#58 oil/H_2O V-200 process oil (in plastic drum)
#59 oil/H_2O process oil; full; open; product on top of drum
#59A oil/H_2O 5-gallon can full of oil (same as #59)

INSIDE MIXING BUILDING (LOWER LEVEL)

#60 grease 25-gallon open drum; grease (Exxon Ronex MP)
#61 grease same as #60
#62 oil/H_2O open; water and sediment (1/4 full)
#63 oil/H_2O full; water and sediment and unknown

OUTSIDE (PARKING LOT AREA)

#64 empty EMPTY drum
#65 empty EMPTY drum
#66 empty EMPTY drum
#67 empty EMPTY drum
#68 oil/H_2O open; full of water
#69 empty EMPTY drum
#70 empty EMPTY drum
#71 toluene labeled toluene, flammable liquid (Ashland Chemical); some product (1/3 to 1/2 full)

INSIDE MAIN BUILDING

MSDS requested 8/24 → #72 Oakite Oakite 117, industrial solvent; full (35-gallon drum)
Oakite Company, Berkeley Hts., New Jersey (908) 464-6900

#73 solids Boiler feed water treatment (OX or GX OUT 401); label reads ChemCon, Atlanta (404)352-3170 (and H.R. Corbin office)

#73A solids 5-gallon bucket water treatment formula; full; ChemCon (same as #73)

#74 boil. treat. Controlex boiler water treatment; rust inhibitor
Balmar Corp., Decatur; (404)241-8880

Mr. Brian Bovard
Page 4

INSIDE (NEXT TO LUNCH ROOM)

MSJS requested 8/24

#75	oil/H_2O	oil and water; 1/3 to 1/2 full; open 35-40 gallon drum
#76	grease	25-gallon drum Ronex oil MP (grease)
#77	grease	same as #76 (half full)
#78	grease	grease drum (same - Ronex)
#79	empty	thread lube (may be empty); Selig Chemical, Atlanta
#80	grease	Ronex grease drum (25-30 gallon drum)
#81	grease	same as #80 (grease)
#82	grease	same as #80 (grease)
#83	grease	same as #80 (grease)
#84	solids	boiler treatment water (solid material)

There were two additional drums behind a locked door in what appeared to be the former maintenance area of the plant.

When I get complete results on the samples we pulled, Brian, I will call you. If you have any questions, please call me.

Sincerely,

Judy Wenzel

Judy Wenzel
Sales Representative

08233jwc

#100	toluene
#101	oil/H_2O
#102	[redacted] same as #30
#103	oil/H_2O
#104	empty
#105	oil/H_2O
#106	grease

GREENE, BUCKLEY, JONES & McQUEEN
ATTORNEYS AT LAW
SUITE 1300, THE HURT BUILDING
50 HURT PLAZA
ATLANTA, GEORGIA 30303
(404) 522-3541

JOHN DAVID JONES
C. RICHARD MCQUEEN
WILLIAM M. RICH
JAMES C. FRENZEL
HAROLD S. WHITE, JR.
DANIEL A. ANGELO
F. C. SCHENCK
F. TAYLOR PUTNEY, JR.
EDWARD D. BUCKLEY III
MARGARET L. MILROY
J. RUSSELL PHILLIPS
WILLIAM D. MATTHEWS
B. KYLE CHILDRESS
H. LEE PRUETT
LESLIE C. RUITER
ROSE E. GOFF
SALLY REBECCA CLINE

HARRY L. GREENE
(1896-1974)
OF COUNSEL
FERDINAND BUCKLEY

FACSIMILE
(404) 522-3677

May 27, 1993

A. Stephenson Wallace, Esq.
Bush & Wallace
462 Telfair Street
Augusta, GA 30901

Re: E. H. Mann, Inc., d/b/a Warrenton Rubber Company, Bankruptcy Case No. 89-10699-JSD (the "Debtor); The Plant Site in Warrenton, Georgia (the "Site")

Dear Steve:

Enclosed herewith is a report to our office from Brian Bovard, our chemical consultant, with regard to the conditions on the Site resulting from an inspection with Lewis Newsome, the former plant manager for the Debtor.

We have today submitted the Notification with regard to the Site in your name. After you have had a chance to review the report of Brian Bovard, I would suggest a three way conversation to discuss activity to remove certain materials from the Site, conduct certain cleanup operations on the Site, the very interesting issue of whether or not there is insurance coverage for any spill which may exist, and those steps necessary to allow you as Trustee to be in a position to file the application for authority to abandon the Site in the near future.

If you have any questions, feel free to contact Brian directly. Otherwise, we look forward to hearing from you after you have had an opportunity to review the enclosed.

Best personal regards.

Sincerely,

James C. Frenzel

JCF/tc

Enclosure

cc: Mr. Brian Bovard

P.S. Brian tells me we are still awaiting the MSDS Sheets from Exxon and upon receipt we will forward the same to you.

JCF

02657\00001\tc6866

BRIAN E. BOVARD
3058 PACES STATION RIDGE
ATLANTA, GEORGIA 30339
(404) 435-8913

MEMORANDUM

TO: JIM FRENZEL

FROM: BRIAN BOVARD BEBovard

DATE: May 26, 1993

RE: E. H. MANN, INC., D/B/A WARRENTON RUBBER COMPANY; PLANT SITE VISIT (the "SITE")

On May 19, 1993 I met with Lewis Newsome at the Site in Warrenton, Georgia. We walked the Site and buildings, seeking to identify product drums/containers still on Site in order to ascertain the presence of materials that could be considered hazardous waste.

A series of photographs are attached, along with a descriptive summary of the photos.

All of the AST's have been removed from the Site, and Newsome thought that the removal had occurred within the past five months.

What follows are recommendations for Steve Wallace in dealing with conditions and materials still present at the Site:

1. Hazardous Waste

   a. There are several materials on Site that would be considered hazardous waste and need to be removed:

      i. any "Rubber Solvent" remaining in the UST's, both by virtue of ignitability characteristic and hazardous constituents (toluene);

      ii. liquids/residues in drums that were used to transport "Rubber Solvent" to mixing plant;

      iii. liquids/residues in drums that contained toluene;

      iv. liquids/residues in drums that contained naphtha;

v. liquids/residues in drums that contained "valve cement," an on-site mixture containing toluene and naphtha;

vi. liquids/residues in drum that contained "MCP-25", by virtue of corrosive characteristics; and

vii. liquids/residues in drums that contained "Surret Fluid 4K," by virtue of hazardous constituent (methyl chloroform).

b. I have filled out the "Notification of Regulated Waste Activity" form with the appropriate information and will submit it to the State agency as requested in Steve Wallace's letter to you dated April 29, 1993.

c. Steve should contact Alternate Energy Resources, Inc., ("AER") a company in Augusta that is permitted to handle hazardous waste of this nature. AER may need samples of the materials, and information on commercial products, in order to fill out "Waste Profile Sheets" on each material (copy attached). Some of the needed information is contained in the MSDS Sheets included in the photograph section. I can assist Steve with this contact, if he so desires.

2. Housecleaning

(a) There are several places on Site where spill liquids/residues are very apparent. Note photographs # 1,2,6,7,9,10,15,16 and 18. To lessen any concerns about ongoing contamination, or sources of contamination (once all AST's and drums are removed), the Trustee should consider soaking up any non-hazardous liquid residue with sawdust or sand.

(b) The only spill residues that may be from hazardous waste materials are in the area of the "oil house" (Photographs # 15 and # 16). If the spill residue is from lube oils or such, no problem. If, however, the spill residue is from "valve cement" or "Surret Fluid 4K," then the residue and contaminated soil, if any, would be considered hazardous waste as well.

(c) The Trustee should also remove all non-hazardous product drums/containers yet on Site, as industrial waste, in order to remove future concerns or questions about the nature of the products.

02657\00001\tc6860

PHOTOGRAPH DESCRIPTIONS
WARRENTON RUBBER COMPANY
MAY 19, 1993

Photos # 1-3:

There are about 29 drums behind the main building that contain liquid. Exposed to the elements with bungs open, most have obviously accumulated rain water.

Several of these drums originally contained toluene or naphtha. Toluene is a "listed" toxic chemical, and naphtha would contain hazardous constituents such as benzene and would likely qualify as hazardous under the flammability characteristic as well. Hence, those drums that contained toluene or naphtha, even if diluted with rain water, would still be considered hazardous waste.

One or two of these drums may contain "valve cement,"a dark, viscous liquid created by mixing rubber compound, toluene and naphtha. These drums would be considered hazardous waste because the product contains hazardous constituents.

On drum was labeled "hydrosteam - liquid steam cleaner." L. Newsome thought this material would have been used in a spray steam cleaner apparatus to remove rust, grease and oil from equipment. A product data sheet provided by the product manufacturer, Northland Mfg., Inc. of Tallahassee, FL, does not indicate any hazardous concerns.

Photos # 4-5:

Show the location of the two UST's behind the main building (note stem pipes). According to L. Newsome, the rubber solvent stored in the UST's would be pumped out into 55 gal drums to be transported to the mixing plant. Thus, the drums in the area of the UST's most likely were used accordingly and may contain residue of the rubber solvent, which was a hazardous material by nature of flammability.

Photos # 6-7:

Show the location of the two AST's (now removed) used to store the "100/100 Process Oil" and clearly indicate the area of the spillage that occurred when a tank truck overloaded one of the AST's. L. Newsome thought that happened in 1985 and the spill involved about 1/3 of the transport, or about 2000-2500 gallons of product.

Photo # 8:

Shows a catch basin under the RR spur on the back side of the mixing building where carbon black was unloaded from rail cars. The dark residue is carbon black, and the catch basin is filled with rain water obviously mixed with carbon black residue.

Photo # 9:

Shows the overflow or catch tank outside the mixing building. The "100/100 Process Oil" was pumped from the AST's (horizontal pipe in picture) into the mixing plant through this pumping apparatus.

Photo # 10:

Inside corner of mixing building (nearest to main building). Shows piping and pump where the Process Oils were pumped over to the rubber production equipment. Stains on wall and liquid on floor indicate recent spillage/leakage, possibly associated with removal of AST on floor directly above that held "790 Process Oil."

Several drums/containers were located inside the mixing building. Most appeared to be lubricants or carbon black containers. One drum, however, was noted to be "MCP-25". The label identified it as a "extra heavy duty cleaner degreaser for removing...soils such as burned on greases and oils." The label also had a "corrosive" highlight. A MSDS sheet has been requested from Marchman Chemical Products of Augusta, GA. This material may well be considered a hazardous waste by virtue of the corrosive characteristic.

Photo # 11:

Shows one end of the mixing building and location of rubber production unit (on left).

Photo # 12:

Shows area beside the main building where the two AST's that stored # 2 heating oil, used in the boiler located in the main building, were previously located. No indications of contamination.

Photo # 13:

Georgia Power Company transformer located behind the main building and next to the mixing building. Stainage noted around valve in upper left corner, on ground and on valves in lower left corner.

Photo # 14:

Behind the main building and next to a small tin shed - the "oil house" - showing the approximate previous location of the silver bullet AST that stored propane and another AST that stored gasoline.

Photo # 15:

Shows drums next to the "oil house", and area that evidences recent spillage/leakage. Likely that drum(s) were knocked over during recent removal of propane and gasoline AST's.

One of the drums was labeled "NUTO H68", an Exxon Company USA product. Conversations with Exxon technical service personnel indicated the product was an antiwear hydraulic oil, with a mineral oil base, and was not hazardous. A MSDS sheet has been requested.

Photo # 16:

Inside corner of "oil house" indicating past spillage/leakage of drum(s).

Inside the "oil house" were drums labeled "Ronex MP' and "XD-3 Engine Oil." Both Exxon Company products, Ronex MP is a multi-purpose grease and XD-3 is a 20 weight lubricating engine oil. Both are non-hazardous materials.

Another drum was labeled "Surret Fluid 4K". Exxon technical service personnel identified this material as a heavy asphaltic based lubricant for wire ropes and open gears, but indicated it was cut (diluted) with 1,1,1-trichloroethane, a chlorinated solvent also known as methyl chloroform, a "listed" toxic chemical. A MSDS sheet has been requested, but his material would be considered hazardous waste.

Photo # 17:

Taken behind the main building showing the relative location of the mixing building (on right) and the "oil house."

Photo # 18:

Taken inside the main building showing the corner where the air compressor and air dryer were previously located. Same area in which dry products were stored.

In the area where dry products were previously stored, several containers/bags still remain. Identified products are:

> "Santocure MOR" - a Monsanto product used as an accelerator for synthetic rubber. Actually, 2-(Morpholinothio) benzothiazole, a non-hazardous material.
>
> "Staybelite Ester Resin" - a Hercules product used in adhesive coatings. An hydrogenated resin and thermoplastic resin, this would be a non-hazardous material.
>
> "Oakite 117" - an industrial solvent labeled combustible. The product came from Southern Sales Warehouse Co. in Atlanta, but no such listing currently exists. The term "combustible" usually means having a flash point greater than 140°F, and therefore this material would not be considered a hazardous waste under the ignitable characteristic.

Photo # 19:

Sales office building located in front of main building.

Photo # 20:

Taken from entrance road showing front of main building with sales office (trailer) on left.

Photo # 21:

Taken from back corner of property looking toward the mixing building.

Photo # 22:

Taken from back corner of property looking toward the rear of the main building and showing proximity of mixing building on the right.

02657\00001\tc6852

Georgia Department of Natural Resources

205 Butler Street, S.E., East Floyd Tower, Atlanta, Georgia 30334

Joe D. Tanner, Commissioner
Harold F. Reheis, Director
Environmental Protection Division

06/01/93

A. STEPHENSON WALLACE TRUSTEE
E H MANN INC DBA WARRENTON RUBBER
462 TELFAIR ST
AUGUSTA , GA 30901

Re: EPA ID NUMBER GAD984321513
101 FOWLER ST
WARRENTON ,GA 30828

Dear A. STEPHENSON WALLACE :

We have recently received your notification of regulated waste activity (EPA Form 8700-12).

The above referenced EPA ID number has been assigned to the facility at the address given. This number is site specific and will be used by the Georgia Environmental Protection Division and the US EPA for identification purposes. This number is not a permit. It is used for data management and information tracking purposes.

Your cooperation in protecting Georgia's environment is appreciated.

Sincerely,

Gigi Steele
Hazardous Waste Management Branch

recycled paper

BRIAN E. BOVARD
3058 PACES STATION RIDGE
ATLANTA, GEORGIA 30339
(404) 435-8913

May 26, 1993

Hazardous Waste Management Branch
Georgia Environmental Protection Division
Floyd Towers East
205 Butler, S.E.
Atlanta, Georgia 30334

Re: E.H. Mann, Inc., d/b/a Warrenton Rubber Company, Debtor
Bankruptcy Chapter 7 Case No. 89-10699-JDS
Warrenton, Georgia Plant Site
EPA Form 8700-12

Dear Sir or Madam:

Enclosed please find a completed EPA Notification of Regulated Waste Activity Form 8700-12 for processing and assignment of an Installation ID Number.

Should anything further be required, please contact A. Stephenson Wallace, Trustee for the Debtor, whose address and phone number are listed on the Form.

Sincerely,

BEBovard

Brian E. Bovard

BEV/tc
Enclosure

cc: A. Stephenson Wallace, Esq.
James C. Frenzel, Esq.

02657\00001\tc6867

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

EPA

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

[X] A. First Notification

[ ] B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

II. Name of Installation (Include company and specific site name)

E.H. MANN, INC. DBA WARRENTON RUBBER

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 101 FOWLER STREET

Street (continued):

City or Town: WARRENTON

State: GA

ZIP Code: 30828-

County Code:

County Name: WARREN

IV. Installation Mailing Address (See instructions)

Street or P.O. Box: 462 Telfair Street

City or Town: Augusta

State: GA

ZIP Code: 30901-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last): WALLACE

(first): A. STEPHENSON

Job Title: Trustee

Phone Number (area code and number): 706-722-7574

VI. Installation Contact Address (See instructions)

A. Contact Address: Location [ ] Mailing [X]

B. Street or P.O. Box:

City or Town:

State:

ZIP Code:

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner: WARREN COUNTY DEVELOPMENT AUTH

Street, P.O. Box, or Route Number:

City or Town: WARRENTON

State: GA

ZIP Code:

Phone Number (area code and number): -

B. Land Type: C

C. Owner Type: C

D. Change of Owner Indicator: Yes [ ] No [ ]

(Date Changed) Month Day Year

EPA Form 8700-12 (01-90) Previous edition is obsolete.

Continue on reverse

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [ ] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
   - [X] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other - specify
3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketer
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. EP Toxic (D000)	(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))			
X	X		X	U220	U226		

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
U220					
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
A. Stephen Wallace	Trustee in Bankruptcy	4/27/93

XI. Comments

F.H. Mann, d/b/a Warrenton Rubber Company is the sub-lessee of the subject property, is not operating, and is the Debtor in a pending proceeding in the U.S. Bankruptcy Court for the Southern District of Georgia, Augusta Division, Chapter 7, Case No.: 89-10699-JDS. Applicant is the Trustee in bankruptcy for the Debtor.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Brian E. Bovard
3058 Paces Station Ridge
Atlanta, Georgia 30339

M E M O R A N D U M

TO: James C. Frenzel

FROM: Brian E. Bovard BEBovard

DATE: July 20, 1993

RE: E.H. Mann site: soil contamination areas (from OHM Phase II study) and probable product sources

The OHM study identified four (4) areas of soil contamination (see attached chart from the report).

Area 1: UST area

We know that at least one of the two UST's was used to store "Rubber Solvent," but it's not certain that the smaller tank held the same. If not, the second UST probably held heating oil or a process oil.

Product removed from the UST's was manually pumped into 55-gallon drums which were then taken to the mixing plant building. Any surface contamination in this area was likely the result of sloppy handling in loading or unloading product from the UST's.

Area 2: AST's/Process Oil

This is the largest area of surface contamination, which we know resulted from the approximate 2,000-2,500 gallon "over-fill" spill of the "100/100 Process Oil" back in 1985.

Area 3: Adjacent to covered work area behind main building

This is the general area where the "oil house," the propane and gasoline AST's, and the vast majority of product drums were located.

The OHM soil samples showed no reportable levels of purgeable aromatics, which would seem to eliminate gasoline, toluene, or naphtha as the likely source. Lubricating oils could be a possible source, but I wouldn't rule out the drums that contained toluene, naphtha, or the mixed "value cement" completely.

I would speculate that sloppy handling of drum materials was the cause of any surface contamination.

Area 4: AST/Truck location

Supposedly the AST and truck (tanker) kept in this area were used to store #2 heating oil that was burned in the boiler inside the main plant building.

Again, I would speculate that any surface contamination in this area was the result of sloppy handling or leaking nozzles from the AST and/or the tanker.

NOTE: The OHM soil samples were tested for purgeable aromatics/purgeable hydrocarbons (EPA Test Method 8010/8020), and with but one exception, all compounds tested BDL (Below Detection Limit). That exception was a 0.564 ppm level of tetrachloroethylene in one sample, but the toxicity characteristic maximum concentration level is 0.7 ppm.

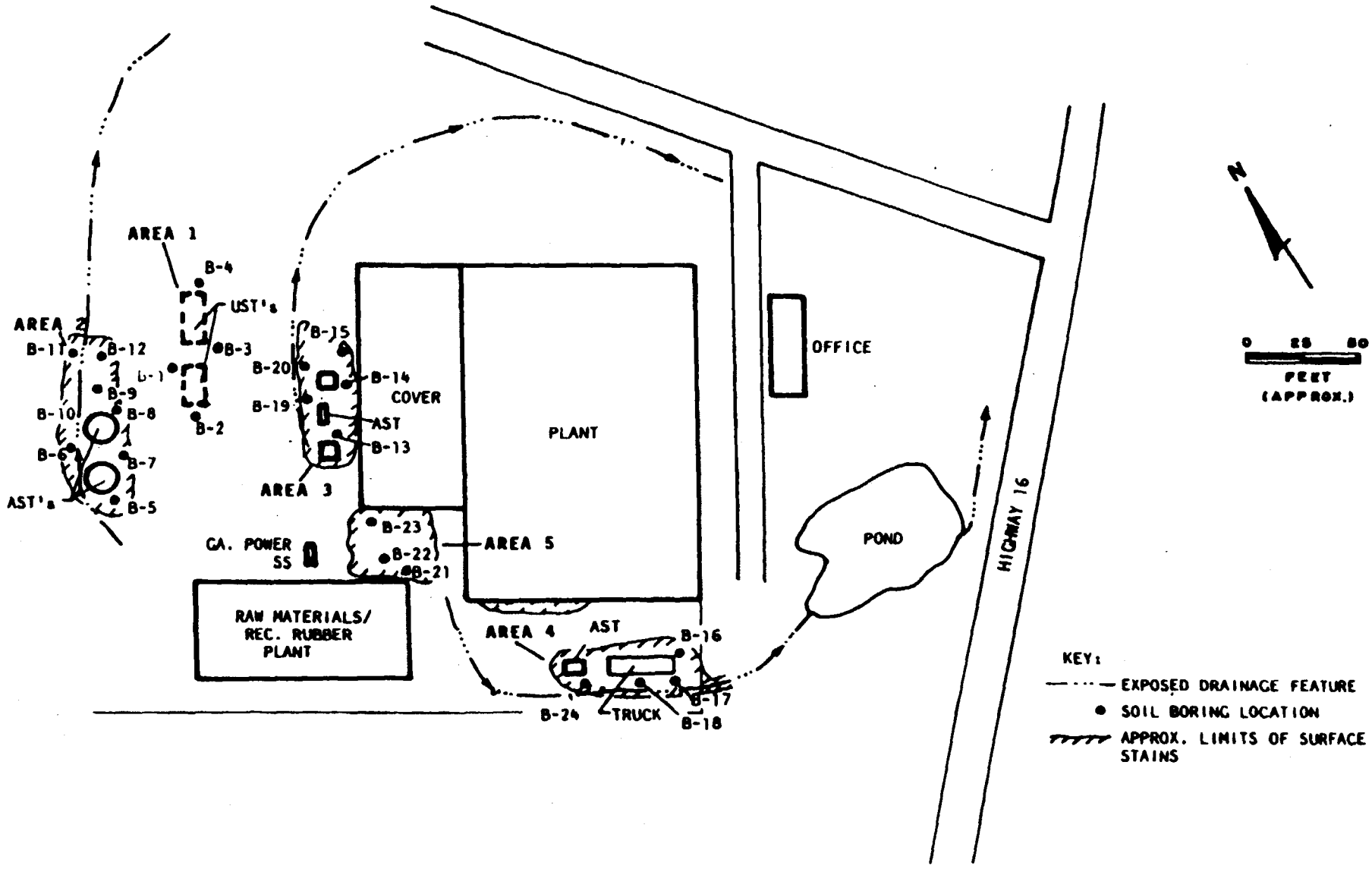
If gasoline, toluene, or naphtha were the sources of surface contamination, you'd expect them to show up in the 8010/8020 tests.

The contamination reported in the OHM study is all TPH related. Removing the 8010/8020 compounds from the list of candidates leaves basically the process oils, lubricating oils, and heating oil as the most likely sources of contamination.

BEB

BEB:dlr

02657\00001\dlr5101



PROJECT: KEARNEY-NATIONAL

PROJECT No. 8737

FIGURE 1 Site Plan Showing Boring Locations and Surface Stain Areas.

OTIM Corporation

H. Derrick Peterson, Esq.

Counsel in Environmental Law & Science

23401 Ridge Road
Germantown, MD 20876

Tel: (301) 540-7948
Fax: (301) 540-8164

July 12, 1993

VIA FEDERAL EXPRESS

James C. Frenzel, Esq.
Greene, Buckley, Jones & McQueen
Suite 1300, The Hurt Building
50 Hurt Plaza
Atlanta, Georgia 30303

Re: E.H. Mann Property, Warrenton, Georgia

Dear Jim:

Pursuant to your agreement today with Eric Dannenmaier regarding possible compensation for the use of same, I am loaning you the enclosed copies of environmental assessments of the Mann property commissioned by Kearney-National.

If you have any questions before our conference call on Friday, please feel free to call me to discuss them.

Sincerely,

H. Derrick Peterson

cc: Eric Dannenmaier

OHM Corporation

May 23, 1990

Kearney National, Inc.
c/o H. Derrick Peterson
Bryan, Cave, McPheeters, & McRoberts
1015 Fifteenth Street NW
Washington, DC 20005-2689

RE: Phase II Soils Assessment, Warrenton Rubber Plant
Warrenton, Georgia

Dear Mr. Peterson:

OHM Remediation Services Corp., a subsidiary of OHM Corporation, (OHM), has developed this letter report to describe the findings of Phase II of the Soils Assessment of the Warrenton Rubber Company facility located on Highway 16 in Warrenton, Georgia.

Appendices A through C are attached to this document. Appendix A of this document contains the Phase I report. Soil boring logs are presented in Appendix B, and Phase II analytical results are provided in Appendix C.

During the Phase I investigation, physical evidence (i.e., surface staining) was identified at several locations. Two soil samples were collected from the 0 to 6-inch depth interval and analyzed for Total Petroleum Hydrocarbons (TPHCs). The first soil sample (No. 7519-5), collected northwest of the horizontal above-ground storage tank (AST) located west of the main plant, revealed the presence of TPHCs at a concentration of 3030 ppm. The second soil sample (No. 7519-6), collected downgradient (northeast) of the two vertical ASTs on the northwest boundary of the property revealed TPHCs at a concentration of 860 ppm. Four surface water samples were collected from on-site intermittent streams and a small pond located on the southeast portion of the site. These samples were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX). However, no compounds were present above the detection limit.

Phase II of the environmental assessment was performed in order to further characterize the site. During this phase, five areas were selected for further investigation (See Figure 1, attached). These areas were chosen because of their proximity to chemical storage tanks, because of previous site activities, or due to the apparent presence of physical evidence of contamination. A brief description and summary of the soil investigation performed at each area is as follows:

13400 Mohawk Road ■ P.O. Box 121190 ■ Clermont, Florida 34712-1190 ■ 904-394-8601

AREA 1

Area 1 is located in the center of the open area north of the Main Plant and houses two underground storage tanks (USTs) of unknown age. Reportedly, the western tank is a 1500-gallon solvent tank containing approximately 2½ feet of liquid, and the eastern tank is a 500-gallon fuel oil tank that contains approximately 8-inches of an oily liquid. Four soil borings were constructed in this area; samples were collected from several depth intervals. Surface soils above the USTs were stained. No obvious staining of subsurface soils was noted, but a strong hydrocarbon odor was encountered in boring B-4. Groundwater was encountered at depths of 1.8 feet to 3.3 feet below ground surface.

AREA 2

Area 2 is located near the northwest property boundary and houses two vertical ASTs situated on a concrete pad. These tanks reportedly contain processing oil used in the manufacturing of inner tubes. A sheen was present on surface waters in this area. Soils were stained from the surface to a depth of approximately 4 feet. Five soil borings and three hand auger borings were drilled in this area. Groundwater was encountered at a depth of 2 inches to 5 feet below land surface.

AREA 3

Area 3 is located adjacent to the covered work area and houses a horizontal AST and two storage sheds that contain several 55-gallon drums labeled Nuto-66, Naphtha, and Toluene. Soils in the area were stained. Three soil borings and two hand auger borings were performed in this area. Groundwater was encountered from a depth of 6 inches to greater than 10 feet (boring B-14 contained no water).

AREA 4

Area 4 is located near the southwest corner of the main building and encompasses one horizontal AST and a truck tanker situated on a concrete slab. The AST reportedly contains processing oil. In this area, an oily sheen was present in surface runoff and soils were stained. One soil and three hand-auger borings were performed in this area. Due to heavy rainfall during drilling, depth to groundwater could not be determined; however, the groundwater depth is estimated to be 0 to 2 feet below land surface.

AREA 5

Area 5 is the open area west of the main building that is bounded by the Georgia Power Company transformers, the raw materials plant, and the main building. In this area, an oily sheen was present on surface runoff waters, and surface soils were stained. Numerous hand-auger borings were attempted in this area; however, due to a layer of gravel and cobbles, the hand augers could not be advance beyond 1½ feet. Access with the drill rig was not possible due to extremely wet conditions to the north and equipment blocking the access through the plant. Therefore, conclusions concerning the sub-surface conditions in this area cannot be made.

During the soil investigation, soil boring logs were maintained in the field (see Appendix B). All samples were retained in glass sample jars, placed on ice in a cooler, and transported to ETC-Florida Laboratory in Clermont, Florida for analysis. A total of sixty-one samples were collected during this sampling event. Near surface samples with obvious staining were not analyzed as a cost-saving measure. Thirty-four samples were analyzed for TPHCs (EPA Test Method 9073), and nine samples were analyzed for purgeable aromatics/purgeable hydrocarbons (EPA Test Method 8010/8020).

EPA Test Method 8010/8020 analyses were performed on samples collected from Areas 2 and 3. One sample, collected from the 2-foot depth interval of boring B-2, contained Tetrachloroethylene at a concentration of 0.564 ppm. No detectable levels of EPA Test Method 8010/8020 compounds were found in the other eight samples. Analytical results of the purgeable aromatics/purgeable halocarbon sample analyses are summarized in Table 1, attached. Complete analytical results of the Phase II sampling are presented in Appendix C.

TPHC analysis is performed using an Infrared Spectrophotometer which measures the carbon double bond stretch and detects compounds related to gasoline, diesel, oils, lubricants, and greases (petroleum products). Pursuant to the Georgia Environmental Protection Department Chapter 391-3-15.09, a 100 ppm (mg/kg) action level for TPHCs has been established for soils on-site containing petroleum-related compounds in the vicinity of USTs which are located within a ½-mile radius of water wells.

Of the thirty-four samples analyzed by EPA Test Method 9073, thirteen contained TPHCs at concentrations exceeding the 100 maximum contaminant level. The TPHC analyses are summarized in Table 2, attached. Complete analytical results are presented in Appendix C.

Potential off-site sources of contamination have been researched. Immediately surrounding the facility to the south, southwest, and west, land use is predominately for farming purposes. The presence of herbicides and pesticides is expected in the vicinity of the study property. However, excessive contamination from these compounds was not evidenced in this investigation.

Facilities surrounding the study property include Health Tech Children's Clothing manufacturing facility to the northeast, and a sewage treatment settling pond to the east. Cursory review of the operations of each of these facilities, in our opinion, identifies each as posing an insufficient environmental threat.

Potential off-site receptors of contamination typically include downgradient private and municipal water sources. Direction of groundwater flow in this physiographic region typically follows the surface topography. Assumed groundwater flow direction is toward the southeast.

Warrenton City Water Department reports that Watershed Project No. 46 supplies the City of Warrenton and some of the county. This supply source consists of a 125-acre pond located approximately one mile to the west of the study property. Only one private well, operated by a dairy farm approximately 1/4 mile to the west, is reported.

OHM's evaluation of soil quality on this site indicates the following:

- No significant elevated levels of EPA 8010/8020 compounds were noted in soils.

- Elevated levels of TPHC were found in the soil in all investigated areas.

- During the site investigation, OHM personnel observed a sheen of hydrocarbons in surface water in all three draining areas.

- The relatively extensive hydrocarbon contaminants of soils on site and the high groundwater conditions suggest the possibility for groundwater contamination. In Georgia, all subsurface waters are considered drinking water; therefore, EPA safe-drinking-water standards may apply.

- It is unclear from our discussions with the Georgia Department of Natural Resources (DNR) representative whether the entire site will be considered under the UST regulations. We consider it prudent at this

juncture that the most stringent soil clean up criteria of 100 ppm, for TPHC concentrations and 20 ppm for total volatiles (BTEX) be used.

- No off-site sources of contamination have been identified during our evaluation.

- No off-site potential receptors of contamination have been identified immediately hydraulically downgradient to the study property.

Soils contaminated with oil should be excavated and properly disposed of to prevent the further spread of hydrocarbon contamination. The soils should be removed until only visually "clean" soils remain and these "clean" soils should be sampled to verify TPHC levels below the State of Georgia action level of 100 ppm.

It is visually estimated that approximately 2,000 cubic yards of soil may need to be excavated and properly disposed. These soils should be acceptable for disposal at a lined industrial landfill; however, further analytical sampling will be required prior to acceptance. If the soils cannot be disposed of in an industrial landfill, off-site or on-site incineration is an option.

Please note that if the high groundwater conditions prevalent at the time of this investigation persist during excavation, dewatering may be necessary and treatment of these waters may be required. In addition, excavation in areas 3 through 5 may have the potential to undermine the foundations of the Raw Materials/ Recycled Rubber Plant and the cover at the rear of the Main Plant. It may be necessary to brace the excavations to prevent damage to these structures.

Removal of soil in Areas 1, 2, 3, and 4 will require removal/ disposal of ASTs, USTs, and small storage buildings. All removal should be in accordance with industry practices and applicable state regulations. During removal of the soil, the operations should be inspected by an environmental professional to document the presence of any oil-contaminated soil and verify that remaining soils are below the 100 ppm action level.

The presence of contaminated soil on this property where the groundwater table occurs at or just below land surface indicates a high possibility for groundwater contamination. Unlike soil contamination, groundwater contamination has a tendency to move in a direction and at a rate consistent with groundwater flow. Therefore, groundwater contamination may spread both vertically and horizontally. An assessment of groundwater quality requires the placement of monitor wells and collection/analysis of groundwater samples. A groundwater quality assessment is recommended

to complete this property assessment and to accurately determine cleanup requirements.

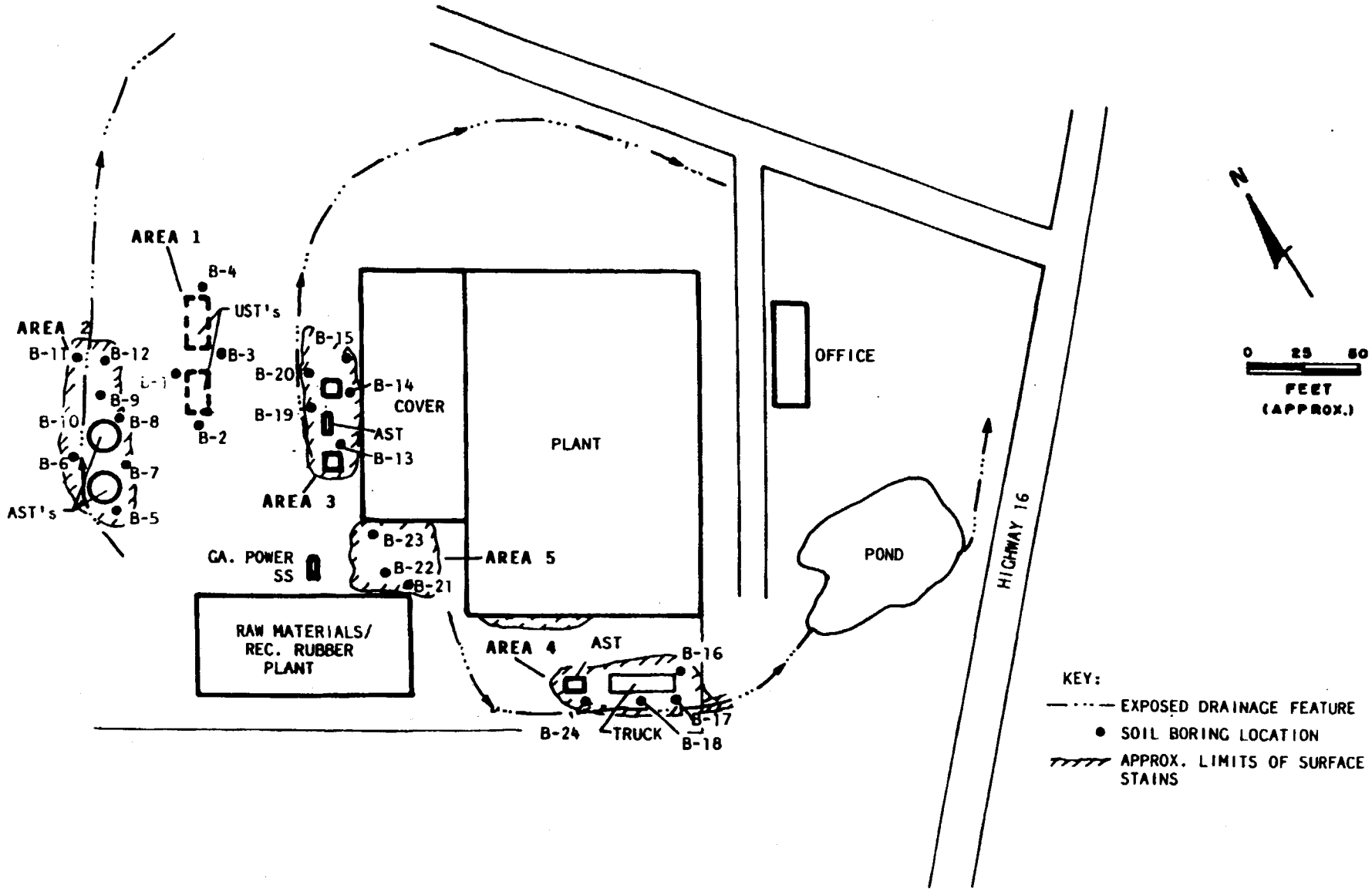
If you have any questions or comments, please do not hesitate to contact me at 407-241-8903.

Sincerely,

Rodney K. Morrison

Rodney K. Morrison, P.G.
Hydrogeologist

Attachment



PROJECT: KEARNEY-NATIONAL

PROJECT No. 8737

FIGURE 1 Site Plan Showing Boring Locations and Surface Stain Areas.

OHM Corporation

TABLE 1

PURGEABLE AROMATICS AND
PURGEABLE HALOCARBON DATA SUMMARY

Sample	Depth (Feet)	Concentration
B-1	2	All compounds BDL
B-2	2	*
B-3	2	All compounds BDL
B-4	2	All compounds BDL
B-13	4	All compounds BDL
B-14	4	All compounds BDL
B-15	1	All compounds BDL
B-19	4	All compounds BDL
B-20	5	All compounds BDL

*Tetrachloroethylene at 0.564 mg/Kg, all other compounds BDL.

BDL = Below Detection Limit

TABLE 2

TOTAL PETROLEUM HYDROCARBON DATA SUMMARY

Sample		Depth (ft)	TPHC (ppm)
B-1		2	<5
B-1		8	9.6
B-2		2	<5
B-2		8	<5
B-3		2	<5
B-3		8	<5
B-4	2.2'	2	156
B-4		4	1300
B-4		8	<5
B-5		3.5	7.47
B-6		4	7.65
B-7		4	7.30
B-8		4	31.9
B-8		8	141
B-9		4	9.89
B-9		8	<5
B-10		4.5	35.9
B-11		4.5	10.5
B-11	2'	7	3810
B-12		1	13.1
B-12		4	<5
B-13	3.5'	1	1540
B-13		4	105
B-14		1	116
B-14	not encountered	4	1920
B-15		1	227
B-15		4	133
B-16		1	120
B-16		4	35.9
B-17	not encountered	5	1240
B-18	not encountered	5	542
B-19		4	49.1
B-20		5	<5
B-24		5	7.56

< = Less than Detection Limit

1.0 INTRODUCTION

Kearney-National, Inc. has retained O.H. Materials Corp. (OHM) to perform a pre-acquisition environmental assessment of a property on Highway 16 in Warrenton, Georgia. This environmental assessment has been conducted to provide a determination of any potential, or existing, environmental liabilities associated with the presence of contamination on the property originating from on-site or off-site sources.

The environmental assessment included a background search, visual site inspection, interviews, and sampling of the site surface soils and laboratory testing of the recovered samples.

This assessment was performed pursuant to completion of work described in a proposal (No. 0003380) dated June 9, 1989, and authorized by an agreement signed by John Delaney dated June 26, 1989.

TABLE OF CONTENTS

EXECUTIVE SUMMARY

1.0 INTRODUCTION..... 1-1

2.0 PURPOSE AND SCOPE OF THIS ASSESSMENT..... 2-1

2.1 PURPOSE..... 2-1
2.2 SCOPE..... 2-1

3.0 LOCATION AND SITE DESCRIPTION..... 3-1

3.1 LOCATION..... 3-1
3.2 SITE DESCRIPTION..... 3-1

FIGURE 3.1, SITE LOCATION MAP..... 3-2
FIGURE 3.2, SITE PLAN..... 3-3

4.0 INVESTIGATIVE METHODS..... 4-1

4.1 VISUAL SURVEY AND INTERVIEWS..... 4-1
4.2 SAMPLING AND ANALYTICAL..... 4-1
4.3 DISCUSSIONS WITH THE USEPA AND GEPD..... 4-1

5.0 ANALYTICAL RESULTS FOR SOIL..... 5-1

5.1 SAMPLING AND ANALYSIS OF SITE SOILS..... 5-1

FIGURE 5.1, SAMPLE LOCATIONS..... 5-2

6.0 ENVIRONMENTAL SETTING..... 6-1

6.1 GEOLOGY..... 6-1
6.2 HYDROGEOLOGY..... 6-1
6.3 WATER USAGE..... 6-1

7.0 DISCUSSION..... 7-1

7.1 PROPERTY USE..... 7-1
7.2 SURROUNDING PROPERTY USE..... 7-3

8.0 SUMMARY AND RECOMMENDATIONS..... 8-1

8.1 SUMMARY OF FINDINGS..... 8-1
8.2 RECOMMENDATIONS..... 8-1

APPENDIX A - INTERVIEWS

APPENDIX B - ANALYTICAL RESULTS

APPENDIX C - INDUSTRIAL HYGIENE CONSULTATION REPORT

2.0 PURPOSE AND SCOPE OF THIS ASSESSMENT

The following sections describe the work performed by OHM during this assessment.

2.1 PURPOSE

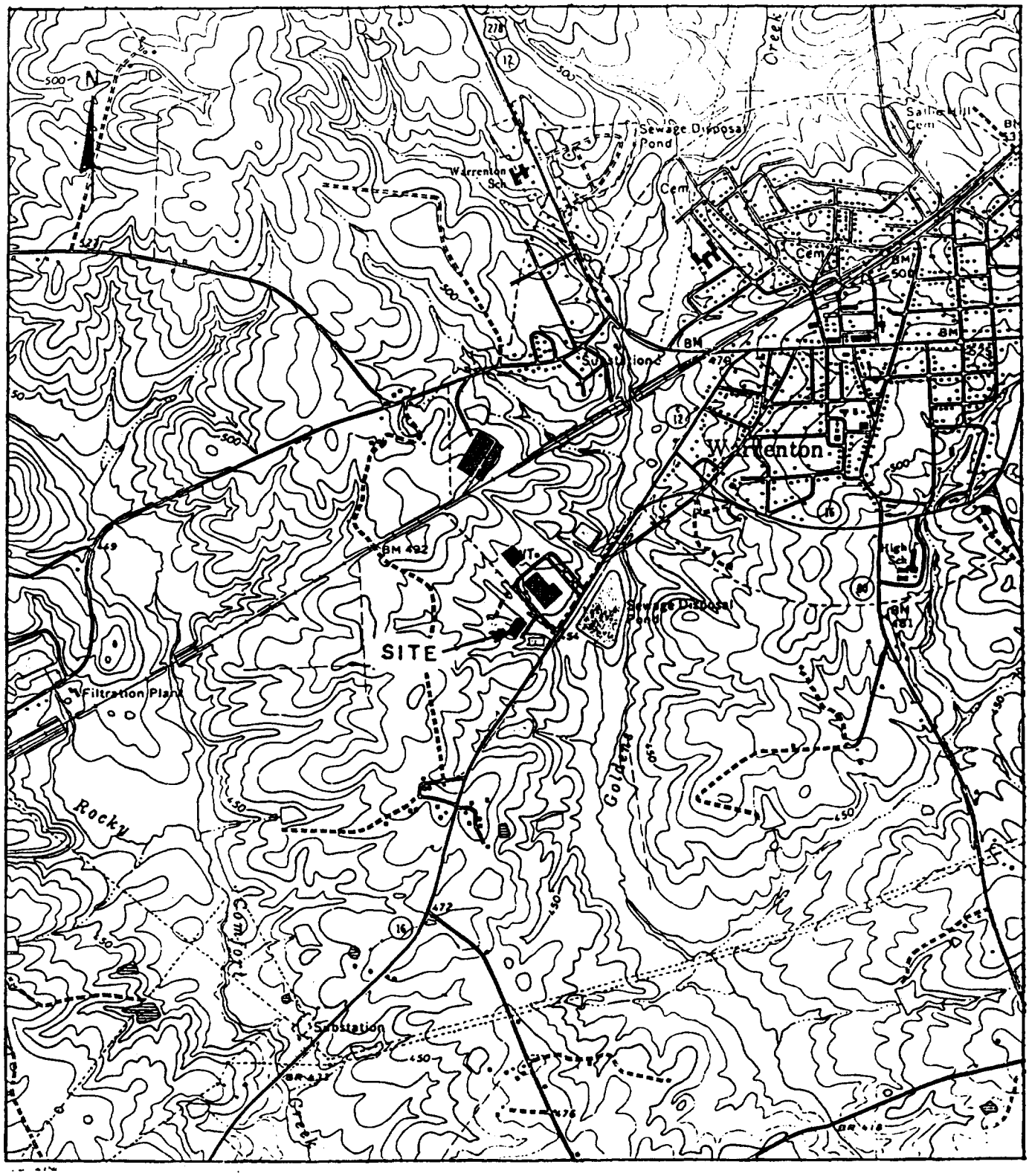
The purpose of this environmental assessment was to identify any environmental liabilities associated with the ownership of this property on Highway 16, Warrenton, Georgia.

2.2 SCOPE

To achieve the ends of this assessment, OHM completed the following scope of work:

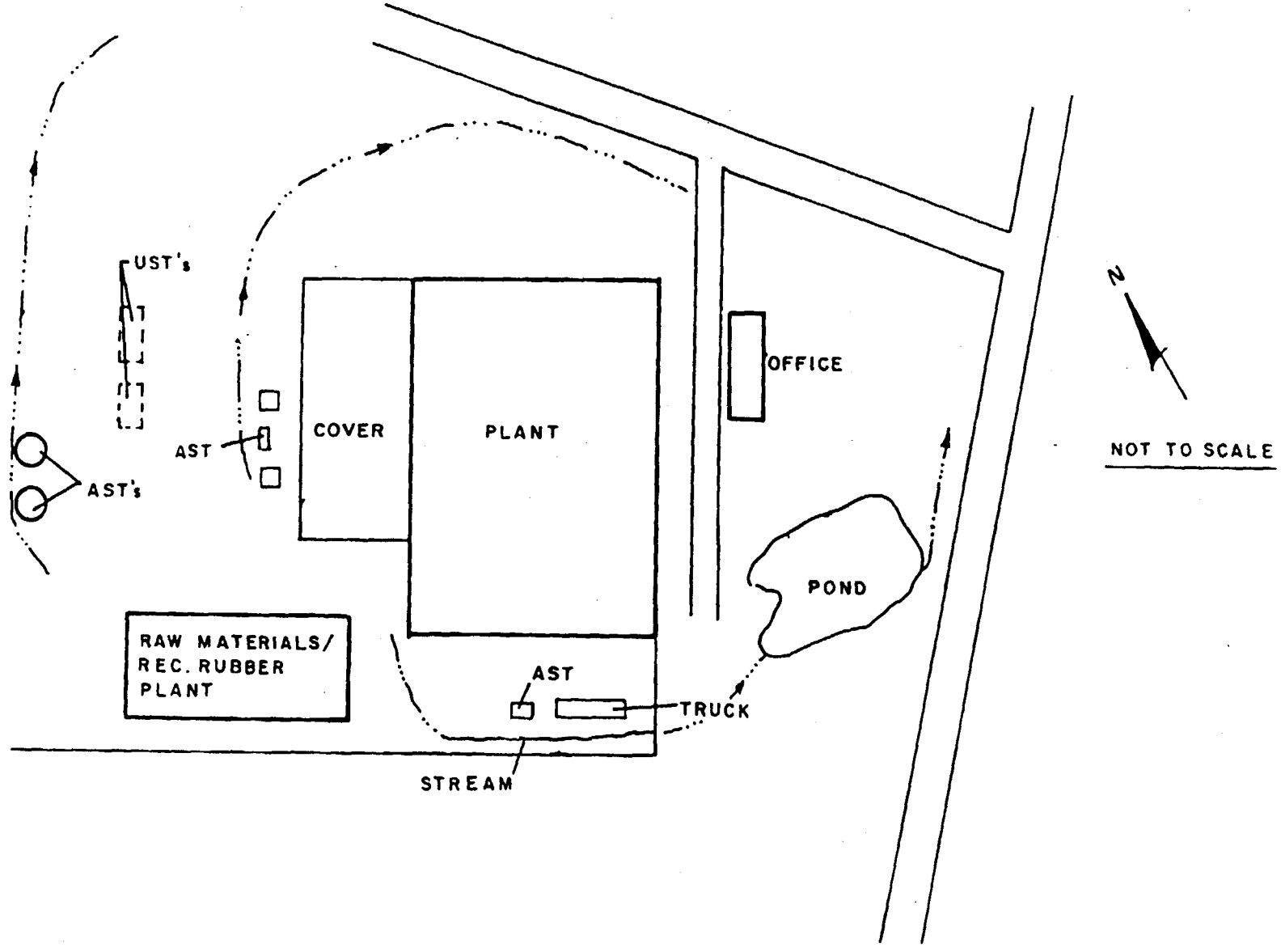
- Review of regionally specific geologic and hydrologic data
- Review of topographic maps
- Interviews with individuals familiar or associated with the property both in its present and past uses
- Field evaluations, including visual observations of the existing site facilities, utilities, surface water, rock, surface soil conditions, vegetation types, ground surface contours, fill areas, excavation areas, roadways; unusual surface conditions including stained ground, refuse areas, revegetated areas, unusual drainage channels, and unusual soil color, texture, or appearance
- Facility inspections included visual evaluations of conditions of the existing structure. The site was inspected for the presence of waste materials, waste disposal, presence of power generators, batteries or storage tanks (both above and below ground), septic fields, and the condition of the facilities.
- Soils sampling and submission of the samples to a laboratory for analyses for compounds or components of concern
- Regulatory review, including discussions with the Georgia EPA and the USEPA with regard to CERCLA records and the presence of hazardous materials on or near the site

Submittal of this report concludes the scope of OHM's services as detailed by our June 9, 1989, proposal, which excluded considerations of radon or asbestos.



SOURCE: U.S.G.S. 7.5' QUAD MAP, WARRENTON, GA., 1972, PHOTOREVISED 1987.

PROJECT: KEARNEY-NATIONAL PROJECT No. 7519 LOCATION: WARRENTON, GA.	Figure 3.1. Site Location Map.	OHM The Environmental Services Company



PROJECT: KEARNEY-NATIONAL
PROJECT No. 7519
LOCATION: WARRENTON, GA.

Figure 3.2. Site Plan.

OHM
The Environmental Services Company

3.0 LOCATION AND SITE DESCRIPTION

3.1 LOCATION

The Warrenton site is an approximately 10 acre lot on which two structures, approximately 50,000 square feet and approximately 5,000 square feet, have been constructed. These buildings were constructed in 1974. The site is located on on Highway 16 in Warrenton, Georgia (see Figure 3.1).

3.2 SITE DESCRIPTION

The site consists of a 10 acre industrial plot of land on which two buildings, approximately 50,000 square feet and approximately 5,000 square feet, have been constructed. Rectangular in shape, the lot is set off Highway 16 and an access road serves to connect the property to the highway (see Figure 3.2). There is a parking area immediately southeast of the main structure. Photos 1 and 2 show the property in views from east to west and northeast to southwest, respectively.

The property is bordered on the south by trees and there is a small pond on the southeastern portion of the site (Photo 1). The surrounding area is rural industrial.

Topography at the site is sloping to the southeast. Site soils and terrain are consistent with those expected in this area. The surficial soils consist of fine sand to clay sized soil.

4.0 INVESTIGATIVE METHODS

The following sections describe the procedures OHM followed during the investigation of the property on Highway 16 in Warrenton.

4.1 VISUAL SURVEY AND INTERVIEWS

To initiate this environmental assessment, an OHM inspector walked the entire area of the site and documented his observations along the way. Interviews with persons familiar with site usage were completed and these interviews are included in Appendix A.

4.2 SAMPLING AND ANALYTICAL

Soil samples were recovered from areas suspected of having contaminants. Two soil samples were taken from northwest and far northwest areas at this site. These soil samples were taken from the upper 6 inches of soil in areas suspected of containing hydrocarbon contamination or showing oil staining.

Surface water samples were recovered from the pond located on-site along with influent and effluent streams to the pond. A water sample was also retrieved from stagnant water in a drainage ditch on the northeastern portion of the site.

4.3 DISCUSSIONS WITH THE USEPA AND GEPD

OHM has contacted the U.S. Environmental Protection Agency (USEPA). OHM was informed that no hazardous waste dumping, storage or spillage have been reported at this site. No USEPA actions are existing against this facility or adjacent facilities.

OHM has consulted the Georgia Environmental Protection Division's (GEPD) files of reported hazardous waste sites. The property in question was not listed nor were any properties in the area of the site listed in the file.

5.0 ANALYTICAL RESULTS FOR SOIL

5.1 SAMPLING AND ANALYSIS OF SITE SOILS

Two soil samples were collected as mentioned in Section 4.2. These soil samples were analyzed and the results may be seen in Appendix B. The soil samples were recovered from the northwestern and far northwestern portions of the property. The locations of these soil samples may be seen in Figure 5.1. More detail of the sample areas is shown in Photos 3 and 4. Sample locations include an area used for storage of flammable (hydrocarbon) materials and an AST reported to contain gasoline (Sample 7519-5) and an above-ground storage tank (AST) area (Sample 7519-6).

The soil samples were tested for Total Petroleum Hydrocarbon (TPHC) using EPA Methods. The following summarize the analytical results:

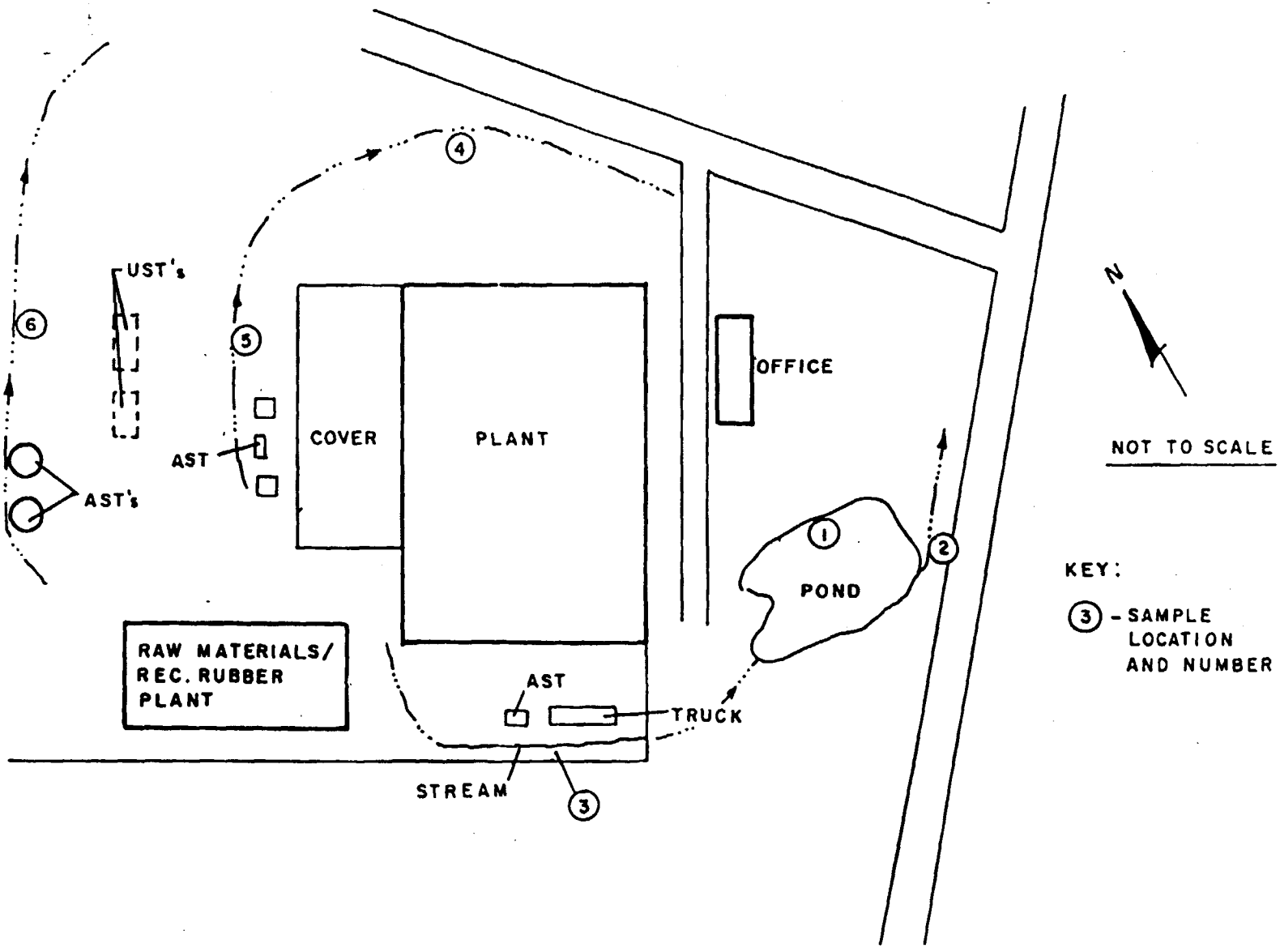
Sample #	TPHC (ppm)
7519-5	3,030
7519-6	860

The TPHC analysis is performed using an Infrared Spectrophotometer which measures the carbon carbon double bond stretch. This analysis picks up gasoline, diesel, oils, lubricants, and greases.

The GEPD has no set standards for action level regarding soils contaminated by hydrocarbons. As a general rule the GEPD allows TPHC values of less than 100 ppm. TPHC values above 100 ppm are taken on a case by case basis, with major factors in any decisions regarding action being the proximity of contamination to ground water and threats to drinking water sources.

Note that at this site, the TPHC documents surface soil contamination (to 6 inches depth). Soils below this level were not sampled.

Four surface water samples were recovered from the pond (Sample 7519-1) located on the southeast portion of the site along with the effluent (Sample 7519-2) and influent (Sample 7519-3) streams to the pond. A water sample (#7519-4) was retrieved from stagnant water in a drainage ditch on the northeastern portion of the site. See Figure 5.1 for sample locations.



PROJECT: KEARNEY-NATIONAL
PROJECT No. 7519
LOCATION: WARRENTON, GA.

Figure 5.1. Sampling Locations.

OHM
The Environmental Services Company

The surface water samples were tested for the compounds of fuels/oils (benzene, toluene, ethylbenzene and xylenes "BTEX"). The following summarizes the analytical results:

Sample #	Total BTEX (ppb)
7519-1	< 20
7519-2	< 20
7519-3	< 20
7519-4	< 20

6.0 ENVIRONMENTAL SETTING

The following sections describe the environmental setting of the Warrenton, Georgia, site.

6.1 GEOLOGY

The site is situated west of Augusta, Georgia, within the Southern Piedmont physiographic province. Generally the surface soils in this region are referred to as "saprolite"--clay-rich, thoroughly decomposed rock formed in place by chemical weathering of igneous or metamorphic rocks. At the site, the unnamed undifferentiated granite and granitic gneisses in the area have been weathered to form the local saprolitic soils. Depth to the unweathered "parent" rock is unknown.

6.2 HYDROGEOLOGY

Ground water in the near surface occurs under unconfined aquifer conditions. The soils on site have generally low permeabilities and thus low well yields. High permeabilities and large well yields of 25 to 200 gallons per minute are available from wells penetrating fault zones and zones of fracture concentrations in the underlying crystalline rock (Cressler et.al., 1979) at depths of 50 to 300 feet. The depth to ground water and ground-water flow direction are not known at this site. Local ground water can be inferred to flow in a southeasterly direction based on topography.

6.3 WATER USAGE

Local water is supplied by the City of Warrenton and no water wells are located on the property. No water wells used for drinking were found in the immediate vicinity (within 0.25 mile) surrounding the property.

7.0 SITE CONDITIONS

The sections following provide an account of OHM's findings during this assessment.

Highway 16 is situated to the southeast and connected to the property via an approximately 1/4-mile road along the northeastern boundary of the site. The buildings on this property are comprised of a warehouse-style factory building and a smaller, cinder block rubber recycling building. There are loading docks on the north side of the larger building for warehouse access, and a gravel.parking area to the front.

7.1 PROPERTY USE

The production facility was constructed in 1974 and henceforth used by Warrenton Rubber for the production of inner tubes and related products. Interviews indicate that production has existed in its present form since 1974.

The manufacturing processes at this site may be described as follows:

- The principal raw materials in the process are synthetic rubber, recycled rubber, and processing chemicals. These components are fed to a large mix tank, at which point carbon black, a processing oil, and heat are added to form this plant's raw product. This entire operation takes place in the process building.
- Raw product is taken from the process building to the main production building (labeled on Figure 3.2 as the Main Plant).
- In the Main Plant, the raw product is heated, formed, and cut to strips which are thence hollowed as the inner tubes.
- Following the hollowing process, the still-hot inner tubes are contact cooled in a water trough supplied by water from the pond. This water is continually recycled from trough to pond.
- Following cooling, the tubes are immersed in a water/talc bath, coating the tubes with talc (a clay mineral), used to prevent the tubes from sticking to each other.

- The long tubes are then cut to the desired length, taken to circular forms, sealed as circular tubes, and the valve stems placed. At this same station, the tubes are test inflated, deflated, and thence sent for stacking and shipment.

As may be seen from the foregoing, the principal use of chemicals and potentially hazardous constituents occurs in the process building, at which point the raw materials for this manufacturing are developed.

Inner tube production processes on site include use of the following chemicals stored on site:

Royalene EPDM	Toluene
Butyl	Naphtha
Exxon N-650	Nuto H-66
Process Oil	Benzothiazyl Disulfide
Ronex MP	Sulphur
Zinc Oxide	Talc

No material safety data sheets (MSDS) were available.

7.1.1 Aboveground Storage Tanks

During OHM's site visit, several areas of concern were noted. Two large vertical aboveground storage tanks (ASTs) were noted along the northwestern boundary of the site (see Photo 4). These tanks show significant amounts of spillage, most likely the result of overfilling or otherwise poor housekeeping in oil transferals. A soil sample (No. 7519-6) was retrieved from the drainage ditch downgradient of these ASTs and analyzed for Total Petroleum Hydrocarbons (TPHC). The results indicate 860 ppm TPHC in these soils.

One AST and a small building which appeared to contain flammable liquids were located on the northwest side of the main facility (see Photo 3). The AST reportedly contained gasoline. Fifty-five gallon drums in the small building were labeled as "Nuto H-66", "Naptha" and "Toluene". OHM observed black staining surrounding this tank and building, presumably the result of poor housekeeping. A soil sample (No. 7519-5) was retrieved from the drainage ditch downgradient of this area and analyzed for TPHC. In addition, a water sample (No. 7519-4) was retrieved from a stagnant pool downstream of the aforementioned area and analyzed for Total BTEX, common components of gasoline.

Two horizontal ASTs are located along the southwest boundary of the site (see Photo 6) were reported to contain a light-weight production oil. Visual oil staining due to spillage was evident, presumably the result of overfilling or

poor housekeeping. No visual leaks were observed. A stream flows past these ASTs from the effluent of a rubber cooling process into a pond in front of the facility. Water samples were retrieved from the effluent of the pond, the pond itself, and the pond influent (see Photo 7) (sample Nos. 7519-1, -2 and -3) and analyzed for total BTEX.

Oil staining and water sheens were evident along with three 55-gallon drums off the east corner of the reprocessing building (see Photo 8).

7.1.2 Underground Storage Tanks

OHM also observed two underground storage tanks (USTs) (see Photo 5). No leakage could be documented within the scope of this project; however, some surface spillage was noted. The USTs were reported to be 15 years old and may be assumed to be of painted steel construction. The size of the tanks are unknown.

7.1.3 Worker Health and Safety

David E. Jacobs of the Georgia Institute of Technology has completed an Industrial Hygiene Consultation Report which is provided as Appendix C.

As was noted previously, the rubber plant does not maintain MSDS for hazardous materials which are used on site. Concern for worker health and safety, and worker right-to-know is apparently non-existent.

7.2 SURROUNDING PROPERTY USE

The surrounding area was used primarily in a rural and industrial capacity.

To the north along Highway 16, there is a baby clothing manufacturing facility and to the rear is an approximately 1/2-acre industrial building which was vacant at the time of this study. The EPA has no Notice of Violations (NOVs) on record for this facility or other nearby properties.

8.0 SUMMARY AND RECOMMENDATIONS

8.1 SUMMARY OF FINDINGS

OHM's inspection and evaluation of this site indicates the following:

- Five ASTs and two USTs, along with several 55-gallon drums on site, show evidence of spillage.
- Poor housekeeping has led to the development of several areas of hydrocarbon contamination to soils.
- The relatively extensive hydrocarbon contamination to soils, suggestive of careless disposal/spillage of process materials, also raises the concern that this spillage/ uncontrolled disposal may have been sufficient to develop ground-water contamination in the area.
- OHM's sampling and analysis of surface waters from the pond suggested that these waters are relatively clean. However, as was documented by photograph, OHM observed a sheen of hydrocarbons on portions of this pond, suggesting that these waters are periodically contaminated with hydrocarbons. As is evidenced by the lack of MSDS on site, there is no apparent concern by current operators of the site for worker health and safety and worker Right-to-Know considerations.
- The ASTs have no provisions for containment of any spillage.

In summary, this inspection and evaluation indicates that the current operators of the facility have little or no concern for environmental or worker health and safety matters. Moreover, as is substantiated by our analytical work, there is clear evidence of contaminated soils on site, and reason to believe that ground water may be, or is threatened to be, contaminated.

8.2 RECOMMENDATIONS

The following summarize our recommendations for further action.

8.2.1 Phase II Studies

Further evaluations would be required to determine in detail the vertical and horizontal extent of hydrocarbon contamination to the soils and ground water.

This work should include, at a minimum, the following:

- Additional soil sampling in the identified spill areas to identify the vertical and horizontal extent of hydrocarbon contamination to soils
- The installation of ground-water monitoring wells in the areas of apparent hydrocarbon contamination to soils to ascertain the impact to ground water

These evaluations should be of sufficient detail to identify not only the extent of soils and any ground-water contamination, but also sufficient to identify the scope of any associated remedial costs.

8.2.2 Contaminated Soil Removal

Soils contaminated with oil should be excavated and properly disposed to prevent the further spread of hydrocarbon contamination. The soils should be removed until only visually "clean" soils remain and these "clean" soils should be sampled to verify TPHC levels below the State of Georgia action level of 100 ppm. It is estimated with these limited data that 850 cubic yards of soil will need to be removed. These soils should be acceptable for disposal at an industrial landfill; however, further analytical sampling will be required prior to acceptance. Assuming the soils can go to an industrial landfill, OHM estimates the soils can be removed and disposed of for a ROM cost of $60 to $100 per cubic yard with a minimum of 100 cubic yards. Note the cost per yard will vary with the number of yards removed.

This removal should be in accordance with industry practice. During removal of the soil, the operation should be inspected by an environmental professional and well documented to include the presence of any oil-contaminated soils in the ground around the area, and verification of levels below 100 ppm.

8.2.3 Ground-Water Remediation

As no ground water was sampled under the scope of this phase environmental assessment, ground-water contamination and associated costs can only be speculated.

8.2.4 Containment at the ASTs

In addition, a concrete diked structure should be constructed at each of the 3 AST locations as a safety precaution for future leaks or spills.

8.2.5 Worker Health and Safety

As was noted above, our investigation indicates that the plant does not comply with any of the criteria of the Hazard Communication Standard of 29 CFR 1910.1200. The firm is liable for fines of up to $10,000 for willful negligence of this standard.

8.2.6 Underground Storage Tanks

No leak testing data was available for the USTs. Potential purchasers should require that the tanks be leak tested. Additionally, purchasers should consider the following with regard to these 15 year old tanks.

8.2.6.1 Risk of Leakage in Aging Tanks

As has been noted above, the materials of construction of these tanks are unknown. However, in consideration of their age, it is likely that these tanks are of steel construction and perhaps painted to improve corrosion resistance.

Corrosion in steel tanks is a complex but well-documented phenomenon which is a function of the materials of construction of the tanks, ground water or sources of water around the tanks, and the soil materials in which the tanks are imbedded. The principal modes of failure (that is, the development of leaks) in steel tanks are external corrosion and internal corrosion, respectively. External corrosion is largely the result of galvanic action developed from contact of the metal surface with soils, while internal corrosion occurs in a similar fashion, but with the galvanic action resulting from dissimilar metal surfaces in the tank being linked electrically by water. This condition may arise as a result of damage to the internal tank from gauge stick impact or the scrubbing action resulting from incoming product, both creating a clean metal area under a fill tube which is dissimilar from the other metal in the tank.

OHM has completed risk-based studies for others in this area, establishing that tanks founded in soils similar to those of this region have a high likelihood of developing corrosion after a period of about 13 years. Studies by others have established that, in the south, the average age at which tanks develop leaks due to internal corrosion is about 14 to 15 years.

Both external and internal corrosion may be inhibited by design protection. For example, cathodic protection (which we do not know to be in place or not in place at this site) will protect against external corrosion. Similarly, external corrosion may be inhibited by a choice of tank backfill; that is, the placement of more inert soils (characteristically quartz sands) around the tank rather than replacement of the saprolitic soils around the tanks following placement. Internal corrosion can be ameliorated by installing splash plates or internal lining. We do not know if these protections are in place in these tanks.

In summary, purchasers should recognize that these tanks are of indeterminate age, materials construction, and size. However, the best information available at this time suggests that they are likely 15 years in age or older and of steel construction. In consideration of their age and materials construction, potential purchasers should plan that, without replacement in the next several years, these tanks do have a reasonable potential for developing leaks. As a result of today's regulatory environment, the cost of cleanup of ground water and soil contamination may be very, very high. We believe that the average ground water and soil remediation of spilled petroleum products today costs in the range of $150,000 to $300,000.

8.2.6.2 Regulatory Considerations for Aging Tanks

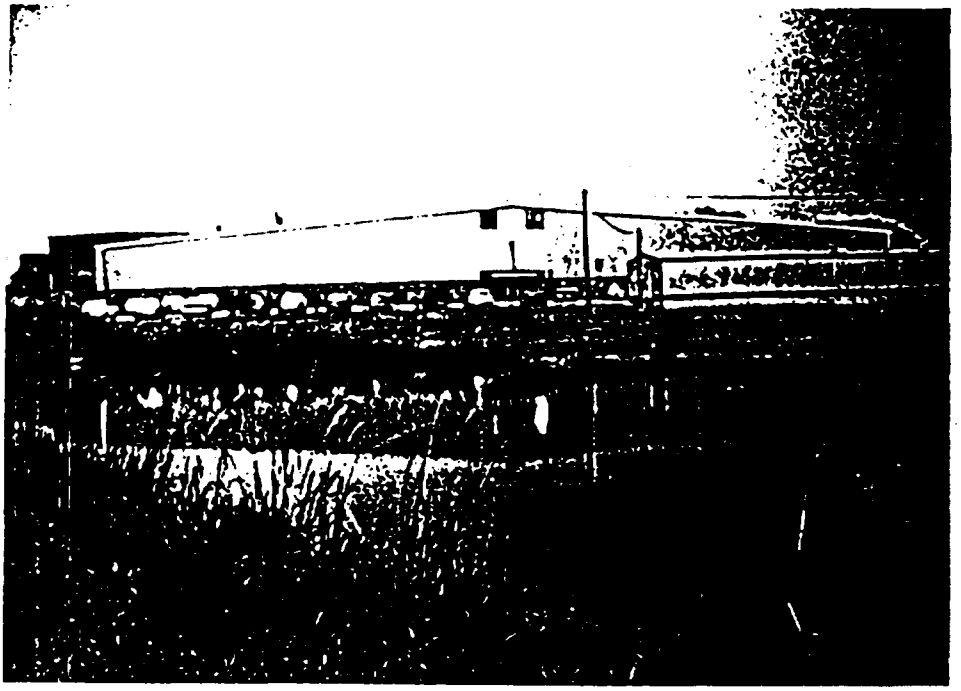
In September 1988, the EPA published a series of new technical rules for UST systems, which became effective in December 1988. If an owner or operator of USTs cannot comply with these regulations, the tanks may have to be closed. These regulations affect new and existing tanks as to:

- Performance standards for corrosion protection, spill and overflow protection and installation
- Leak detection
- Closure
- Release reporting and cleanup
- Financial responsibility

Potential purchasers of this site should consider that likely the most significant impact of these regulations will be requirements for the installation of devices to protect releases from the USTs and piping systems. This tankage will likely have to have release detection by December 1991 and the piping will likely have to have release detection by December 1990. By December 1998, existing UST systems must be upgraded to the standards of new systems.

We encourage potential purchasers of this site to discuss these regulatory considerations with your attorneys.

PHOTOGRAPHS

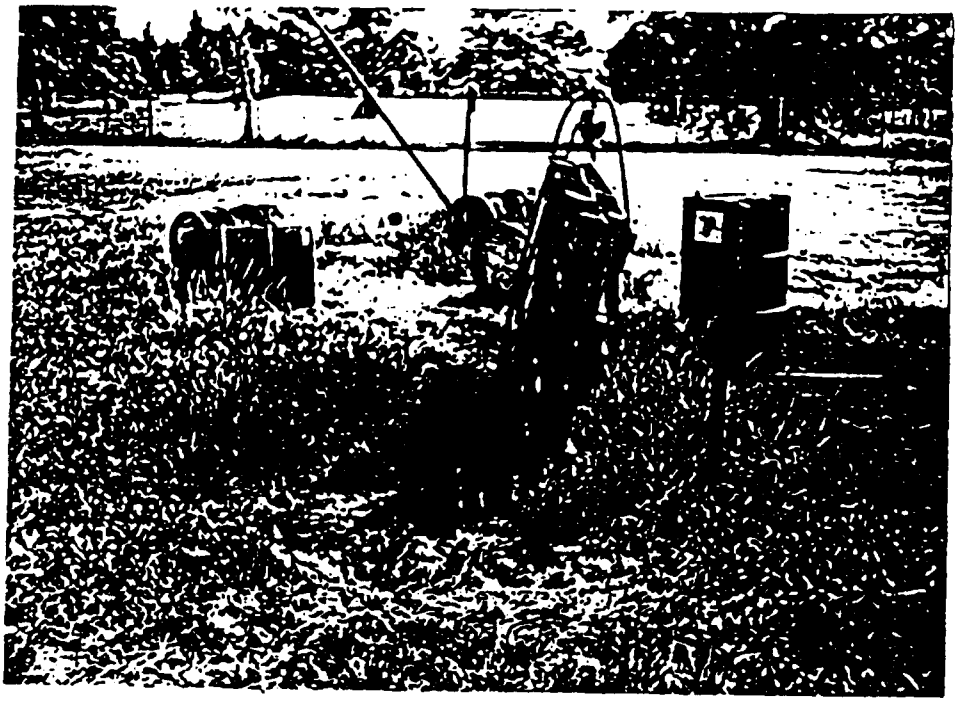


Photograph 1. Site as Viewed from Southeast.

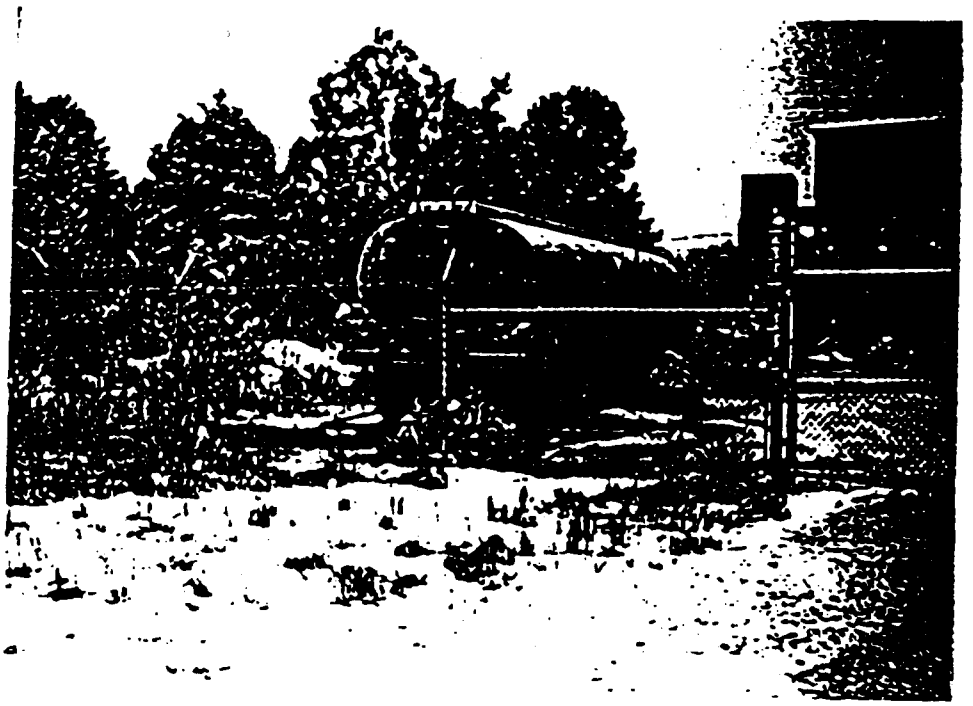
Photograph 2. Rear of Site as Viewed from Northeast.

Photograph 3. AST Reported to Contain Gasoline. Building Shown is Marked Flamable as are Associated Drums.

Photograph 4. Two AST's Reported to Contain Processing Oil and Associated Soils.



Photograph 5. Vent Pipes and Pump to UST's.



Photograph 6. Two AST's (Tanker Trailer and AST Behind it) Reported to Contain Processing Oil.

Photograph 7. Influent Streat to Pond showing Oil Contamination from AST's.

Photograph 8. View of Drums and Oil Contaminated Soil and Water off Southeast Corner of Reprocessing Building.

APPENDICES A THROUGH C

PHASE II
SOILS ASSESSMENT OF
WARRENTON RUBBER PLANT
WARRENTON, GEORGIA

Prepared for:

Kearney - National, Inc.
H. Derrick Peterson
1015 Fifteenth Street NW
Washington, DC 20005

May 24, 1990

Project #8737

APPENDIX A

ENVIRONMENTAL ASSESSMENT OF THE WARRENTON RUBBER PLANT

July 24, 1989

July 24, 1989

Kearney-National, Inc.
c/o H. Derrick Peterson
Bryan, Cave, McPheeters and McRoberts
1015 15th Street, N.W.
Washington, DC 20005-2689

Dear Mr. Peterson:

RE: Report of Environmental Assessment; Warrenton Rubber Plant, Warrenton, Georgia

Please find enclosed three (3) copies of the above referenced report. It has been a pleasure working with Bryan, Cave, McPheeters and McRoberts on this project and OHM would welcome the opportunity to serve you again. Should you have any questions, please do not hesitate to call either myself or John O'Brien at 404-641-1066.

Sincerely,

Patrick M. Gagen
Hydrogeologist

PMG:js

ENVIRONMENTAL ASSESSMENT OF THE WARRENTON RUBBER PLANT IN WARRENTON, GEORGIA

Submitted to:

Kearney-National, Inc.
c/o Bryan, Cave, McPheeters and McRoberts
Washington, DC

O.H. Materials Corp.

Patrick M. Gagen
Hydrogeologist

John F. O'Brien, P.E.
Georgia Registration No. 12044, Exp. 12/31/90

July 24, 1989
Project 7519

Our evaluation of site conditions was based upon data and pertinent project information provided by the client, together with a visual exploration of the site and the field work described in this report. Using our professional judgement and experience, we analyzed all data and information compiled to prepare the site assessment.

OHM shall not be responsible or liable for results which are founded upon information or data which: (a) was not provided by Kearney-National, Inc.; or (b) was not attainable as delineated by the scope of work.

ENGINEER'S TOXIC AND HAZARDOUS SUBSTANCE
LETTER OF OPINION

The undersigned has provided to and for the benefit of KEARNEY-NATIONAL, INC. an investigation for the existence of toxic and hazardous substances, as outlined in the attached report dated, July 24, 1989.

It is the opinion of the undersigned that the investigation is a reasonable inquiry based on the standards of professionals engaged in similar investigations and the locality of the project. Based upon our investigation and resulting environmental survey report which is attached and incorporated herein, we have no reason to believe that hazardous or toxic substances are indicated on the subject property, except as are described specifically in the attached report.

This twenty-fourth day of July, 1989.

BY: _____

Name: John F. O'Brien
Title: Manager
Southern Region Technical Center
Georgia Registered Engineer
No. 12044 Exp. 12/31/90

APPENDIX A

INTERVIEWS

ENVIRONMENTAL, HEALTH, AND SAFETY MATTERS
RELATING TO PROJECT

SITE VISIT PROTOCOL

A. COMPANY STRUCTURE AND NATURE OF SITE

1. What is the nature of the facility's business?

   Production of inner tubes

2. What is the company's interest in the facility (e.g., owner, operator, lessee, lessor)?

   Operator

3. Are there any other operators at the site? If so, what is the nature of their relationship (e.g., subtenant) and the nature of their operations?

   No

4. Who were the prior owners/operators/lessees of the facility? How was the facility used?

   January 1, 1981 Nearney-National, Inc.

5. Were the facility operations ever located at another site?

   No

6. Is the facility owned, operated or used by the company in compliance with applicable zoning and similar local requirements?

   No

7. Has the facility applied for any change in zoning, variance or similar authorization? Is such an application necessary in order to continue the operation of the facility?

   No

8. Is the facility aware of any changes in zoning requirements or similar local requirements which may affect the facility?

   No

9. Are there any geological or hydrogeological studies available for the facility?

   Georgia Tech performed an Industrial Hygiene Consultation Report in June, 1984

10. How good are the facility's relations with the surrounding community? For example, have there been complaints regarding odors, noise, truck traffic, etc.?

    No

11. What correspondence and other communication has the company had with the local public and local authorities with respect to the facility?

    No

B. CLAIMS AND PROCEEDINGS

The following questions pertain to any environmental, health or safety law or regulation which may be applicable to the facility, including any federal, state or local requirement. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Is the company a party to any pending lawsuit or administrative proceeding?

   No

2. Has the company been notified of any threatened or intended lawsuit or administrative proceeding to which it may be made a party?

   No

3. Has the company been identified as a potentially responsible party under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) in connection with the release or threatened release of a hazardous substance?

   No

4. Has the company been a party to any environmental or workman's compensation lawsuit or administrative proceeding concluded within the last ten years?

   Workman's Comp., Approx. $90,000; negligence on worker's part

5. Is the company aware of any claim that a chemical substance used by it in its manufacturing process, or present in its products, creates a risk to human health (specifically including, but not limited to, a risk of causing cancer)?

   No

6. Is the company subject to any consent decree, administrative order or compliance schedule or to any agreement or informal understanding with any governmental authority?

   No

7. Is the company the subject of any threatened or pending governmental investigation regarding environmental or worker health and safety related matters?

   No

8. Has the company received any citations, notices of violation, warnings or complaints from any governmental authority or citizen suit notices or complaints from third parties?

   No

9. Have there been any complaints to any governmental authority or to any other party, including the company, from any private party, including adjacent landowners, regarding any site or facility owned, operated or used by the company?

   No

10. Has the company reported any violations of a law, regulation or permit to any governmental authority?

    No

11. Does the company know of any such violations which have not been reported to a governmental authority?

    No

12. Does the company know or believe that circumstances exist which could result in claims being asserted against it?

    No

13. Does the company know of any requirement or anticipated requirement with which it is or may be unable to comply or which may require an expenditure in excess of $10,000 to achieve compliance with or which will affect the usefulness of the company's facilities to produce, market and sell products currently produced at the facilities?

    No

14. Is the company ineligible for government contracts because of non-compliance with an environmental requirement or has it been threatened with the loss of such eligibility?

    No

C. AIR POLLUTION REQUIREMENTS

The following questions pertain to air pollution control requirements which may be applicable to the facility arising under the Clean Air Act or other federal, state, or local law or regulation. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Does the facility have any sources of air emissions, including fugitive emissions?

   Yes. Dust collector for carbon black.

2. Can the facility identify the pollutants known or suspected to be emitted from each source?

   Yes

3. Is there any emissions monitoring data or emissions calculations?

   No

4. Does the facility have the controls needed to achieve all applicable air pollution requirements?

   Yes. Filters.

5. Does the facility have any environmental emissions permits or other governmental authorizations?

   No

6. Does the facility have any pending applications for emissions permits or other governmental authorizations?

   No

7. Does the facility have all permits and other governmental authorizations required to operate its business for the next three years?

   Yes

8. Has any application for a permit or other governmental authorization been denied or withdrawn within the last ten years?

   No

9. Is the facility operating under or is it requesting any relief from any requirement (e.g., any waivers, modifications, variances, exemptions, extensions, delayed compliance orders)? Is there any need for such relief?

   No

D. WATER POLLUTION REQUIREMENTS

The following questions pertain to water pollution requirements which may be applicable to the facility under the Federal Water Pollution Control Act; Rivers and Harbors Act; Marine Protection, Research and Sanctuaries Act; Coastal Zone Management Act or other federal, state or local laws or regulations. If any questions is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Does the facility have any wastewater discharges (including any stormwater runoff or seepage) from its premises? Are there any floor drains at the facility?

   City Sewer. Yes, they drain into pond.

2. Can the facility identify the pollutants known or suspected to be present in each discharge and where such discharge goes? Is there any effluent monitoring data?

   No

3. Does the facility have the controls needed to achieve all applicable water pollution requirements, including any applicable pre-treatment requirements by a local POTW ("Publicly Owned Treatment Works")?

   No

4. Does the facility have any structures located in any waterway, flood plain, or coastal or wetlands area or other such specially-designated area?

   No

5. Has the facility done any work or placed dredged or fill material in any waterway or wetlands area?

   No

6. Does the facility have any permits or other governmental authorizations?

   No

7. Does the facility have any pending applications for permits or other governmental authorizations?

   No

8. Does the facility have all permits and other governmental authorizations required to operate its business for the next three years?

   No

9. Has any application for a permit or other governmental authorization been denied or withdrawn within the last ten years?

   No

10. Is the facility operating under or is it requesting any relief from any requirement, (e.g., any answers, modifications, variances, exemptions, extensions, delayed compliance orders)? Is there any need for such relief?

    No

11. Has the facility had any spills of oil or hazardous substances (within the meaning of the Federal Water Pollution Control Act) into any waterway or wetlands area?

    No

12. Does the facility have an SPCC (Spill Prevention Control and Countermeasure) plan for each site where oil is handled?

    No, not deemed necessary.

E. HAZARDOUS AND SOLID WASTE REQUIREMENTS

The following questions pertain to hazardous waste[1] and solid waste[2] management requirements which may be applicable to the facility arising under the Resource Conservation and Recovery Act; Comprehensive Environmental Response, Compensation and Liability Act; Safe Drinking Water Act, or other federal, state or local laws or regulations. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Have any hazardous or solid wastes been disposed of on any property currently or previously owned or leased by the facility by any person or at any time?

   No

2. Does the facility have records of the location, quantity and chemical composition of all wastes disposed of on its property?

   No

3. Since the commencement of its business, has the facility arranged for the transportation, treatment or disposal of any hazardous wastes or solid wastes on any property which it does not currently own?

   No

4. Does the company have records of the location, quantity and chemical composition of all hazardous wastes disposed of by or for the facility on property which it does not now own?

   No

---

[1]For purposes of this protocol, "hazardous waste" means any solid, semi-solid, or liquid waste material which is ignitable, corrosive, reactive, toxic, radioactive, infectious or etiological, including any hazardous waste within the meaning of the Resource Conservation and Recovery Act or any hazardous substance within the meaning of the Comprehensive Environmental Response, Compensation and Liability Act.

[2]For purposes of this protocol, "solid waste" means any solid, semi-solid, or liquid waste material other than a "hazardous waste."

5. Other than waste disposal areas, does the facility contain or may it be contaminated by hazardous wastes or solid wastes which it generated or otherwise handled?

   No

6. Does the facility know of any releases or threatened releases into the environment of its hazardous or solid wastes, from any source?

   No

7. Does the facility know of any investigations or inquiries relating to its hazardous wastes or solid wastes or the disposal of such wastes?

   No

8. Has the facility filed with governmental authorities any notices of hazardous waste activity or notices of the location of facilities where hazardous substances (within the meaning of the Comprehensive Environmental Response, Compensation and Liability Act) were stored, treated or disposed?

   No

9. Has the facility filed with governmental authorities any and all required notices regarding the existence of any solid waste management unit, including any underground storage tank, on its property?

   No. 15 year old USTs

10. Can the facility identify the source, quantity and chemical composition of the wastes which it now is generating or otherwise handling?

    Yes

11. Has the facility attempted to adopt any waste minimization programs in any of its operations?

    Yes. Recycle rubber and carbon black.

12. Does the facility have the controls needed to achieve all applicable waste management requirements?

    Yes

13. Is the facility a generator of hazardous wastes? Generator I.D. number? Small quantity generator?

    No

14. Does the facility have any permits or other governmental authorizations, including interim status and identification numbers?

    No

15. Does the facility have any pending applications for permits or other governmental authorizations?

    No

16. Does the facility have all permits and other governmental authorizations required to operate its business for the next three years?

    Yes

17. Has any application made by the facility for a permit or other governmental authorization been denied or withdrawn within the last ten years?

    No

18. Is the facility operating pursuant to or requesting any relief from any requirement (e.g., any waivers, modifications, variances, exemptions, extensions, delayed compliance orders)? Is there any need for such relief?

    No

19. What operations at the facility generate wastes?

    None

20. What quantities of waste are produced and what is their chemical composition?

    None

21. Are hazardous wastes stored at the property in compliance with RCRA, including waste segregation, no-smoking and warning signs, contingency plans, aisle space, labeled with accumulation dates, etc.?

    No

22. Has the facility entered into any contracts regarding the disposal or other handling of solid or hazardous wastes?

    No

23. Are any of the facility's solid or hazardous wastes recycled, reclaimed or reused either by the company itself or by any other entity?

    Yes; rubber and carbon black

24. Were any underground storage tanks located at the facility ever owned or leased by the company?

    Yes

25. Did the facility ever use underground tanks for the storage or disposal of any hazardous or solid wastes, products or any fuels?

    Fuels

26. Have any of the underground storage tanks been assessed by a professional engineer? Are any of the underground storage tanks equipped with leak detection equipment or secondary containment devices?

    No. No.

F. PRODUCTION, USE, OR EXISTENCE OF CHEMICALS

The following questions pertain to the requirements for the production or use of chemicals arising under the Toxic Substances Control Act ("TSCA"); or other federal, state or local law. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Is the facility aware of any PCBs in any quantity located on its property or contained in any of its transformers or capacitors?

   Approx. 15 year old transformers owned by Georgia Power .

2. Is the facility aware of any asbestos in any quantity located on its property or contained in any construction materials, such as pipe or boiler insulation, floor tiles, ceiling tiles, mastic, roofing materials, wallboard, or texturing materials?

   No

3. Has the facility ever manufactured or used any radioactive materials?

   No

4. Is the company aware of any radon detected on its property or of radon deposits in the immediate area of its facility?

   No; no tests.

5. Does the facility have or anticipate having a testing program for health or environmental effects?

   No

6. Does the facility have any toxic data concerning its products, raw materials, or intermediates?

   Monthly safety meetings

G. HEALTH AND SAFETY REQUIREMENTS

The following questions pertain to health and safety requirements arising under the Safe Drinking Water Act, the Occupational Safety and Health Act, the Emergency Planning and Community Right-to-Know Act, and other federal, state or local laws and regulations. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Does the facility provide water for human consumption which is not taken from a public water works?

   No

2. Does the facility have any reports or logs of occupational injuries or illnesses sustained by its employees?

   Yes

3. Does the facility have any estimate or measurement of the occupational exposure (e.g., personal monitoring data) of its employees to any chemicals (such as those listed in 29 CFR §1910.1000 [Tables Z-1, Z-2 and Z-3]) or physical stresses such as noise or radiation?

   No

4. Has the facility used or is it currently using any OSHA-regulated carcinogens (29 CFR §1910.1001-1910.1045) such as asbestos, vinyl chloride, acrylonitrile, etc.?

   No

5. Has the facility instituted a hazard communications program under the Occupational Safety and Health Act?

   No

6. Does the facility maintain OSHA training records? Are MSDS's available to employees?

   No. No.

7. Are any of the facility's products or substances and mixtures used or produced at any of the company's facilities subject to any labeling or "right to know" laws and have any programs been established to comply with such laws?

   Yes; raw materials.

8. Does the facility expose its employees to noise levels exceeding OSHA standards? Are any hearing protection devices used for employees at the facility?

   No

9. Does the facility have the controls needed to achieve all applicable health and safety requirements?

   Yes

10. Is the facility operating under or is it requesting any relief from any requirement (e.g., waivers, modifications, variances, exemptions, extensions, delayed compliance orders)? Is there any need for such relief?

    No

11. Has the facility filed any emergency planning notifications?

    Yes

12. Has the facility prepared any annual chemical inventory forms?

    Yes

13. Has the facility filed any annual toxic chemical release forms?

    No

H. REPORTS

The following questions pertain to any substance manufactured or otherwise handled by the facility. If any question is answered in the affirmative, provide full details regarding the subject matter of the question.

1. Does the facility have any material safety data sheets for its raw materials, intermediates and products?

   No

2. Has the facility conducted or participated in any health or environmental effects studies?

   No

3. Does the facility have any environmental impact statements or environmental assessments?

   No

4. Does the facility have any internal audit or inspection reports or risk analyses relating to environmental, health or safety matters?

   No

5. Does the facility have any inspection reports or risk analyses prepared by any governmental authority, insurance company or other person relating to environmental, health or safety matters?

   Yes; to insurance.

6. Has the facility reported any spills or other releases of oil or hazardous substances?

   No

7. Has the facility provided any medical program for employees? If so, have any medical concerns been found? Workers Compensation claims for EH&S Matters?

   No

8. What correspondence and other communication have there been between the facility and governmental agencies (OSHA, U.S. Environmental Protection Agency, etc.)?

   None

I. MISCELLANEOUS

1. What insurance or agreements of indemnification relating to environmental liability has the facility ever had or does it now have covering sites and facilities owned or operated by the company at any time?

   No

2. Is the facility obligated by reason of any purchase, indemnification or other agreement to defend, indemnify or otherwise hold harmless any other entity with respect to any environmental, health or safety claim or liability?

   No

3. Does the facility handle any radioactive materials?

   No

4. Has the facility ever been denied insurance?

   Yes; Workman's Compensation.

5. What notices or claims have been made by the facility or any other parties regarding insurance coverage of sites or facilities owned or operated by the company?

   Workman's Compensation

6. What contingency plans exist for handling emergency pollution incidents?

   None

7. Are there any requirements contained in permits or elsewhere which may impede or prohibit the transfer of the facility or permits?

   No

8. Does the facility subcontract with any entity for off-site manufacturing? What are the products manufactured off-site? What is known about the subcontractor's EH&S compliance?

   No

9. Are there any other material facts or matters of which the client should be aware?

   No

10. Identify all persons at the facility who might have information concerning any of the above questions?

    Frank Mills
    Lewis Newsom

APPENDIX B

ANALYTICAL RESULTS

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

****
* For In-House Use *
*
*
*
* ABR
*
****

Client: O.H. Materials Corporation (Invoice to)

Project: Warrenton Rubber Same

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Alec Hart

Sample: water soil tissue Sampled by: Client

Other: see station ABI Manager: Austin Raabe

Sample Taken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5233	89-950	56	7519-1	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5234	89-950	56	7519-2	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5235	89-950	56	7519-3	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5236	89-950	56	7519-4	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
R5238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Aust Raabe

Dr. Austin Raabe
Director of Chemistry

NVIRONMENTAL
EALTH
PECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

For In-House Use
ABR

lient: O.H. Materials Corporation (Invoice to)

roject: Warrenton Rubber Same

ddress: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

ttention: Alec Hart

ample: ___water ___soil ___tissue Sampled by: Client

ther: see station ABI Manager: Austin Raabe

ample aken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

ple umber	Lab Book Number	Page Number	Station	Test Required	Results
5233	89-950	56	7519-1	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
5234	89-950	56	7519-2	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
5235	89-950	56	7519-3	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
5236	89-950	56	7519-4	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
5238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Aust Raabe

Dr. Austin Raabe
Director of Chemistry

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

For In-House Use

ABR

Client: O.H. Materials Corporation

(Invoice to)

Same

Project: Warrenton Rubber

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Alec Hart

Sample: water soil tissue

Sampled by: Client

Other: see station

ABI Manager: Austin Raabe

Sample Taken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5233	89-950	56	7519-1	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5234	89-950	56	7519-2	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5235	89-950	56	7519-3	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5236	89-950	56	7519-4	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
R5238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Aust Raabe

Dr. Austin Raabe
Director of Chemistry

APPLIED BIOLOGY, INC.
2968A NORTH DECATUR ROAD DECATUR GEORGIA 30033-5914 404-295-3900

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

For In-House Use

ABR

Client: O.H. Materials Corporation

(Invoice to) Same

Project: Warrenton Rubber

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Alec Hart

Sample: ___water ___soil ___tissue

Sampled by: Client

Other: see station

ABI Manager: Austin Raabe

Sample Taken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5233	89-950	56	7519-1	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5234	89-950	56	7519-2	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5235	89-950	56	7519-3	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5236	89-950	56	7519-4	Benzene	<5 ppb
	89-950	56	(water)	Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
R5238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Aust Raabe

Dr. Austin Raabe
Director of Chemistry

APPLIED BIOLOGY, INC.
2968A NORTH DECATUR ROAD DECATUR, GEORGIA 30033-5914 404-298-3900

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2956

P.O. No.: J7519

Tel. No.: 641-1066

For In-House Use

ABI

Client: O.H. Materials Corporation

(Invoice to) Same

Project: Warrenton Rubber

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Pat Gagan

Sample: ___water ___soil ___tissue

Sampled by: Client

Other: see station

ABI Manager: Austin Raabe

Sample Taken: 7/10/89 Sample Received: 7/10/89 Report Required: 7/20/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5233	89-950	56	7519-1 (water)	Benzene	<5 ppb
	89-950	56		Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5234	89-950	56	7519-2 (water)	Benzene	<5 ppb
	89-950	56		Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5235	89-950	56	7519-3 (water)	Benzene	<5 ppb
	89-950	56		Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5236	89-950	56	7519-4 (water)	Benzene	<5 ppb
	89-950	56		Toluene	<5 ppb
	89-950	56		Ethylbenzene	<5 ppb
	89-950	56		Xylene	<5 ppb
R5237	89-900	56	7519-5 (soil)	Total Petroleum Hydrocarbons	3,030 ppm
R5238	89-900	56	7519-6 (soil)	Total Petroleum Hydrocarbons	860 ppm

EPA Method 418.1 used for R5237-R5238

Austin Raabe

Dr. Austin Raabe
Director of Chemistry

ENVIRONMENTAL HEALTH SPECIALISTS

Page 1 of 1

ABI No.: 390-2988

P.O. No.:

Tel. No.: 641-1066

For In-House Use

AGR

Client: O.H. Materials Corporation

(Invoice to) Same

Project: J7522

Address: 1000 Holcomb Woods Parkway, Suite 112
Roswell, GA 30076

Attention: Pat Gagan

Sample: ___water _x_soil ___tissue

Sampled by: Client

Other: _____

ABI Manager: Austin Raabe

Sample Taken: 7/19/89 Sample Received: 7/19/89 Report Required: 7/21/89 Report Issued: 7/20/89

Sample Number	Lab Book Number	Page Number	Station	Test Required	Results
R5332	89-950	88	7522-7	Benzene	<20 ppb
	89-950	88		Toluene	60 ppb
	89-950	88		Ethylbenzene	34 ppb
	89-950	88		Xylene	248 ppb

Austin Raabe

Dr. Austin Raabe
Director of Chemistry

APPENDIX C

INDUSTRIAL HYGIENE CONSULTATION REPORT

BRIAN E. BOVARD
3058 PACES STATION RIDGE
ATLANTA, GEORGIA 30339
(404) 435-8913

MEMORANDUM

TO: JIM FRENZEL AND STEVE WALLACE

FROM: BRIAN BOVARD BEBovard

DATE: July 9, 1993

RE: GEORGIA OIL OR HAZARDOUS MATERIAL SPILL/RELEASE ACT (1988) (THE "SPILL/RELEASE ACT") REPORTING REQUIREMENTS

Amendments made in 1991 to the Georgia Spill/Release Act essentially tightened up the definition of "Hazardous substance" to conform with hazardous materials as defined in CERCLA.

A copy of the updated version of the Spill/Release Act is attached.

The "process oil" used at the Warrenton site does not qualify as a hazardous substance, as it is not a CERCLA listed item. Being petroleum based, however, the "process oil" would be subject to the Spill/Release Act if the spill/release reached "waters of this state [Georgia]" sufficient to "cause a significant film or sheen upon or discoloration of the surface...or adjoining shorelines...". Upon clarification with the Emergency Response Team office, state waters do include groundwater.

Thus, the "process oil" spill, if it involves soil contamination only, does not appear a reportable event under the amended version of the Spill/Release Act.

The one remaining concern is whether or not groundwater contamination occurred, and whether there is a drinking water source nearby. I am aware that you have again inquired of the attorneys for Kearney National with regard to groundwater testing, and await further word before recommending that you incur the considerable expense involved in groundwater testing.

02657\00001\tc7065

Bert Langley - head of Emergency Response Group (404) 656-6905

YOUNG REFINING CORPORATION • P.O. Box 796, Douglasville, GA 30133 (404) 942-2343
CORPORATE OFFICES

CPO 100 VIS OIL

VIS @ 100°F, SUS	107
@ 210°F, SUS	39
API Gravity	25.2
Sp. Gravity	0.9030
VIS/Grav. Const.	0.864
Mol. Wt.	320
Pour Point, °F	-20
ASTM Color	2.0
Flash Pt., COC, °F	355
Aniline Pt., °F	168
Distillation, °F	
IBP	600
10%	642
50%	691
90%	759

MATERIAL SAFETY DATA SHEET

young REFINING CORP.

Young Refining Corporation
P.O. Box 796
Douglasville, Georgia 30133

IMPORTANT:
To comply with the Federal standard, 29 CFR 1910.1200, please read this MSDS and post this information on to employees, customers and users of this product.

SECTION I — General

Manufacturer's Name: Young Refining Corporation	Product Trade Name: CPO 100 VIS OIL
Street Address: 7982 Huey Road	Other Names: CAS#64741-53-3, DOT ID#NA1993
Douglasville, Georgia 30134	Chemical Family: Petroleum Hydrocarbon
Telephone Numbers: (404) 942-2343 Company	Date Prepared: 4/27/88
(800) 424-9300 Chemtrec	Date Revised:

SECTION II — Hazardous Ingredients

Chemical Identify/Names:	Exposure Limits:
MINERAL OIL MIST	TWA 5 MG/M3
	STEL 10 MG/M3

SECTION III — Physical Data

Boiling Point: 600°F+	Vapor Pressure: (0.3 PSI(REID)
Melting Point: NOT DETERMINED	Vapor Density: HEAVIER THAN AIR
Specific Gravity: 0.91	Solubility in Water: NEGLIGIBLE

Appearance and Odor: AMBER LIQUID WITH PETROLEUM ODOR

SECTION IV — Fire and Explosion Hazard Data

Flash Point: 330°(PENSKY-MARTIN CLOSED CUP) | Flammable Limits: NOT DETERMINED

Extinguishing Media: ☒ CO_2 ☒ Dry Chemical ☒ Foam ☐ Water Spray ☒ Water Fog

Special Fire Fighting Procedures: COOL EXPOSED CONTAINERS WITH WATER SPRAY. DO NOT ENTER CONFINED FIRE SPACE WITHOUT PROTECTIVE EQUIPMENT. THIS MAY INCLUDE SELF-CONTAINED BREATHING APPARATUS.

Unusual Fire and Explosion Hazards: COMBUSTIBLE

SECTION V — Reactivity Data

Stability: ☒ Stable ☐ Unstable	Hazardous Decomposition Products: CARBON MONOXIDE FUMES
Hazardous Polymerization: ☐ Will Occur ☒ Will Not Occur	Condition To Avoid: OPEN FLAME, EXTREME HEAT

Material to Avoid: STRONG OXIDANTS

SECTION VI — Health Hazard Data

Route of Entry: ☒ Inhalation ☒ Skin ☒ Ingestion

Effects of Overexposure: Based upon independent OSHA approved testing laboratory results, this oil contains less than the maximum of polynuclear aromatic compounds which require a potentially carcinogenic label. EYE CONTACT: Based on essentially similar product testing, product is considered practically non-irritating to the eyes. SKIN CONTACT: Based on essentialy similar product testing, product is considered slightly irritating to the skin; prolonged and repeated contact may lead to various skin disorders such as dermatitis, oil acne or folliculitis. INHALATION: The inhalation of vapors(generated at high temperatures only) or oil mist may cause a mild irritation of the mucous membranes of the uuper respiratory tract. INGESTION: Based on essentially similar product testing, product is considered no more than slightly toxic if swallowed.

Emergency and First Aid Procedures: EYES: Flush with water; obtain medical attention. INHALATION: Remove person to open fresh air; obtain medical attention. INGESTION: Do not induce vomiting(aspiration hazard); obtain medical attention. SKIN: Wash with soap and water.

SECTION VII — Precautions for Safe Handling and Uses:

Steps to be taken if material is released or spilled: Shut off leak source and contain spill. Eliminate sources of ignition. This material will float on top of water. Prevent material from entering sewers or waterways. Absorbant material and pads can be used.

Waste Disposal Method: Destroy by incineration.

Other Precautions: Combustible liquid.

SECTION VIII — Control Measures

Respiratory Protection: Air respirator, if exposure exceeds limit.	Protective Gloves: Impermeable gloves
Ventilation: Adequate	Eye Protection: Goggles

Hygienic Practices: Use good personal hygenic practices. Wash hands with soap before eating, drinking, smoking or use of toilet facilities. Oil soaked clothing should be promptly removed and laundered before reuse. Discard oil soaked leather goods.

NOTES: TLV - Threshold Limit Values
STEL - Short Term Exposure Limit
TWA - Time Weighted Average

GREENE, BUCKLEY, JONES & McQUEEN
ATTORNEYS AT LAW
SUITE 1300, THE HURT BUILDING
50 HURT PLAZA
ATLANTA, GEORGIA 30303
(404) 522-3541

JOHN DAVID JONES
C. RICHARD MCQUEEN
WILLIAM M. RICH
JAMES C. FRENZEL
HAROLD S. WHITE, JR.
DANIEL A. ANGELO
F. C. SCHENCK
F. TAYLOR PUTNEY, JR.
EDWARD D. BUCKLEY III
MARGARET L. MILROY
J. RUSSELL PHILLIPS
WILLIAM D. MATTHEWS
B. KYLE CHILDRESS
H. LEE PRUETT
LESLIE C. RUITER
ROSE E. GOFF
SALLY REBECCA CLINE

HARRY L. GREENE
(1896-1974)
OF COUNSEL
FERDINAND BUCKLEY

FACSIMILE
(404) 522-3677

April 23, 1993

A. Stephenson Wallace, Esq.
Bush & Wallace
462 Telfair Street
Augusta, GA 30901

Re: E.H. Mann, Inc. d/b/a Warrenton Rubber Company, Case No. 89-10699-JSD (the "Debtor"); Kearney National, Inc. (the "Sublessor"); Economic Development Authority Site (the "Site")

Dear Steve:

Attached is information which we have received from Derrick Peterson, the environmental attorney for the Sublessor, with regard to an environmental audit separate from the GSC audit prepared at the request of his client as both Sublessor to the Debtor and lessee from the Development Authority for the Site.

Also attached is a copy of the Memorandum from Brian Bovard with regard to his further investigation of the condition of the Site and identification of the materials which are on the Site.

From our conversation last week with Derrick Peterson, apparently the Sublessor has in its files certificates of insurance obtained by the Debtor with regard to the Site. Copies of these certificates are being forwarded to us so that we may investigate the possibility of insurance coverage for any necessary disposal, cleanup, or remediation at the Site.

Based upon the exchange of information flowing back and forth between the Sublessor and Debtor, after you have had a chance to review the attached, we would propose to forward the results of Brian's investigation in the form of both the earlier March memo, with certain editorial deletions, as well as the attached memo, to Peterson as attorney for Kearney National.

Please let us have your thoughts if you do not concur with our concept of continuing to exchange information at least at this point prior to the filing of a motion for authority to abandon the Site, which may, obviously, change the tone of cooperation which has presently been struck.

Also enclosed, in anticipation of removal of materials if determined to be hazardous from the Site, is an EPA Application for Notification of Regulated Waste Activity which you should fill out and return to our office for filing. If you have any questions with regard to the information sought or procedure, please contact Brian directly at our office.

Finally, I understand from Jan Jankowski that you were here in Atlanta this past week for the meeting of Trustees at the Summit, as was my partner, Dick McQueen, and Bill Matthews of our office. I regret that we have not yet personally met, although our telephone, correspondence and FAX relationship continues unabated.

Best personal regards.

Sincerely,

James C. Frenzel

JCF/tc

Enclosure

02657\00001\tc6672

M E M O R A N D U M

To: Eric Dannenmaier

From: Derrick Peterson

Date: April 16, 1993

Re: Environmental Investigation of E.H. Mann Property

Following up on our discussion with the environmental counsel for the trustee in the E.H. Mann bankruptcy case, I compared the environmental assessment that they are working from (GSC Environmental Laboratories Report No. 166-1002-02, April 30, 1992) with the environmental assessment sponsored by Kearney-National, Inc. Kearney's environmental assessment identifies the same primary environmental contamination issue as the GSC assessment, i.e., spilled process oil in soil, but provides the following information that the GSC report lacks:

o The two underground storage tanks: "Reportedly, the western tank is a 1500-gallon <u>solvent</u> tank containing approximately 2 1/2 feet of liquid, and the eastern tank is a 500-gallon fuel oil tank that contains approximately eight inches of an oily liquid" (emphasis added). Notes from my conversations with the inspectors indicate that the solvent in the tank was toluene, which is consistent with my experience with the rubber industry.

o Non-oil contamination: "One [soil] sample, collected from the 2-foot depth interval of boring B-2, contained Tetrachloroethylene at a concentration of 0.564 ppm. No detectable levels of EPA Test Method 8010/8020 compounds were found in the other eight [soil] samples." Also, four surface water samples were collected and analyzed for "Total BTEX" with all four results less than the method detection limit of 20 ppb.

o The following chemicals were identified as being used at the facility:

synthetic rubber	carbon black	process oil (in AST's)
talc	toluene	Royalene EPDM
Butyl(rubber?)	Exxon N-650	Ronex MP
Zinc Oxide	naptha	gasoline (in AST)
Sulphur	Nuto H-66	Benzothiazyl Disulfide

I also noticed that the GSC report indicates active leaking of hydrocarbons from the AST's, which I hope the trustee has curtailed.

This information appears to confirm at least the spill reporting and UST obligations that we have suggested to the trustee's counsel. I would appreciate it if you would pass a copy of this memorandum along to them.

BRIAN E. BOVARD
3058 PACES STATION RIDGE
ATLANTA, GEORGIA 30339
(404) 435-8913

MEMORANDUM

TO: JIM FRENZEL

FROM: BRIAN BOVARD BEBovard

DATE: April 23, 1993

RE: E. H. Mann, Inc. d/b/a Warrenton Rubber Company
Product Usage Information

Since my last memo to you, I have contacted and had additional conversations with Lewis Newsome, former plant manager at the Warrenton facility, most recently on April 16, 1993. I had previously sent Newsome a copy of the GSC assessment report. After receiving the report, Mr. Newsome apparently went out to the plant site. He indicated that finding old purchasing files would be difficult, as all contents of the file cabinets had been dumped on the floor when the cabinets were removed.

Mr. Newsome was quite cordial and forthcoming with information, and would be available to help identify products if a site visit is needed.

A. Underground storage tanks ("UST's"):

There are two UST's on site, but Mr. Newsome did not recall the sizes. He confirmed that they probably were never registered with the State. A third UST existed that contained # 2 heating oil, but it "floated to the surface" some time ago and was removed.

The two remaining UST's were used to store "Rubisol," a rubber solvent product that was purchased from Sechem of Norcross, Georgia. Mr. Newsome said the material was highly flammable. Subsequent conversations with Sechem (Southeastern Chemical, Eastern Services) better identified the product as "Rubber Solvent" purchased for resale from Unocal Chemicals. A MSDS provided by Sechem (attached) indicates that the material to be a petroleum naphtha mixture that does contain cyclohexane and toluene. Toluene is a listed hazardous constituent, and the presence of cyclohexane and a resultant flash point of less than 0°F imparts the hazardous waste characteristic of ignitability to the product. Thus any such product left in the UST's would be considered hazardous waste.

B. Aboveground Storage Tanks ("AST's"):

1. The two largest AST's stored "100/100 Process Oil", a primary component in the tube rubber mix, purchased from Young Refining Corporation in Douglasville, Georgia. Subsequent conversations with Young Refining better identified the product as "CPO 100 Vis Oil", a petroleum-based mineral oil. A product data sheet and MSDS provided by Young Refining (attached) does not raise any concerns about this material being considered a hazardous waste.

2. "Silver" AST - confirmed that this tank was used to store propane, consumed as a fuel product.

3. "Rusted" AST - Mr. Newsome indicated this AST was used to store motor gasoline for use in the "road trucks."

4. "Open top vessel" - not a storage tank or mixing tank, but used as an overflow or catch tank for the lines used to pump the process oil from the AST's into the plant. Any product or contamination associated with the "vessel" is most likely the 100/100 Process Oil.

5. Mr. Newsome said there are two (2) AST's not clearly identified in the GSC report, referenced in paragraph 3.11 as "located in the field directly behind the largest building." These may have been confused with the "silver" and "rusted" tanks. However, Mr. Newsome indicated the existence of a 4000 gallon AST and an 8000 gallon AST that stored # 2 fuel oil used as boiler fuel. These were used after the # 2 fuel oil UST was removed from the site.

6. Another small AST apparently is located inside the smaller building on site (not mentioned in the GSC report), and was used to store a "790 Process Oil." Specific identification of this product is yet unknown, but it appears to be a heavier viscosity process oil, petroleum based, and not unlike the nature of the 100/100 Process Oil.

7. "AST inside the large building" - not really a storage tank, but an air dryer to remove water from the process air lines at the facility.

C. Drums: In addition to the materials mentioned in the GSC report, Mr. Newsome indicated the following products were also regularly purchased in drum or bag containers:

"TMTD" - tetramethytlthiuram disulfide, or thiram, a vulcanizing agent for rubber.

"MBTS" - 2-mercaptobenzothiazl disulfide, a vulcanization accelerator

talc - used as a rubber filler

butyl rubber

motor oil - purchased in 55 gal. drums

toluene - purchased in 55 gal drums

With the exception of toluene, none of the products listed above would constitute hazardous waste. I did not have the April 16, 1993 memo from Derrick Peterson to Eric Dannenmaier when I talked to Mr. Newsome, and thus could not ask about "Exxon N-650", "Nuto H-66," and "Ronex MP." "Royalene EPDM" is some company's brand name for a particular elastomer made from EPDM (ethylene - propylene - diene monomer), used in rubber products.

Summary: At this stage we know for sure that at least two (2) products used on site would constitute hazardous waste: any Rubber Solvent in the UST's and any toluene in drums. With respect to the soil contamination identified in the GSC report, most appears to be related to spillage/leakage associated with the 100/100 Process Oil, which would be non-hazardous and unlikely deemed a public health safety concern unless groundwater contamination was evident.

However, contamination in the area of the UST's is yet unclear as to product source. It could be either the Rubber Solvent material, or even # 2 fuel oil from the earlier UST removed from that area. And contamination in the area of the "rusted" AST is likely to be spilled gasoline. In both cases, however, TPH contamination is less than 100 ppm at the below-surface samples, and thus it would appear that no danger to ground water exists, hence no threat to public safety from that standpoint.

A site visit to further identify drum products is warranted, and should include Mr. Newsome, if possible. The two hazardous waste products thus far identified need to be removed from the site. That will require obtaining an EPA ID Number, and I have attached copies of the form that is required, along with instructions for filling out the form for the use of the Trustee.

02657\00001\tc6668

JOHN DAVID JONES
C. RICHARD MCQUEEN
WILLIAM M. RICH
JAMES C. FRENZEL
HAROLD S. WHITE, JR.
DANIEL A. ANGELO
F. C. SCHENCK
F. TAYLOR PUTNEY, JR.
EDWARD D. BUCKLEY III
MARGARET L. MILROY
J. RUSSELL PHILLIPS
WILLIAM O. MATTHEWS
B. KYLE CHILDRESS
H. LEE PRUETT
LESLIE C. RUITER
ROSE E. GOFF
SALLY REBECCA CLINE

GREENE, BUCKLEY, JONES & McQUEEN
ATTORNEYS AT LAW
SUITE 1300, THE HURT BUILDING
50 HURT PLAZA
ATLANTA, GEORGIA 30303
(404) 522-3541

HARRY L. GREENE
(1896-1974)
OF COUNSEL
FERDINAND BUCKLEY

FACSIMILE
(404) 522-3677

March 18, 1993

A. Stephenson Wallace, Esq.
Bush & Wallace
462 Telfair Street
Augusta, GA 30901

VIA FAX NO. (706) 722-6189

Re: E. H. Mann, Inc., d/b/a Warrenton Rubber Company (the "Debtor"); Warrenton, Georgia Manufacturing Site of the Debtor (the "Site")

Dear Steve:

What follows is a Memorandum from Brian Bovard, our chemical consultant, with regard to the GSC Environmental Laboratories, Inc. Report regarding the existing condition at the Site. The memo contains recommendations with regard to further efforts to identify whether or not there are any hazardous constituents at the Site and, if so, the nature of those constituents.

If you have any questions, feel free to call either Brian or this office. We have received a copy of the Order of Judge Dalis with regard to our employment and will proceed in accordance therewith.

Best personal regards.

Sincerely,

James C. Frenzel

JCF/tc

Enclosure

cc: Mr. Brian Bovard

02657\00001\tc64992

BRIAN E. BOVARD
3058 PACES STATION RIDGE
ATLANTA, GEORGIA 30339
(404) 435-8913

MEMORANDUM

TO: Jim Frenzel

FROM: Brian Bovard

DATE: March 18, 1993

RE: E.H. Mann, Inc., d/b/a Warrenton Rubber Company (the "Debtor") ; Environmental Concerns ~~of~~ at the Site of the Debtor (the "Site")

In an effort to better understand the Phase I Environmental Site Assessment (the "Report") done by GSC Environmental Laboratories, Inc. ("GSC"), I have tried to identify and contact a few key former employees of the Debtor. I spoke first with Emmett Mann, the former owner, now living in Conyers, Georgia (404-483-2565). Mann could not recall the name of the purchasing manager, but suggested that I try to reach Bill Bonner, a former plant manager of the Debtor.

Mr. Bonner is now General Manager of the Cooper Tire & Rubber production facility in Albany, Georgia (912-438-6800), and had been the plant superintendent in Warrenton until 1986. I think he was there before E.H. Mann, Inc. took over operations from Kearney National. Mr. Bonner was cordial, but suggested that any questions about product usage and operations at Warrenton would be better addressed to Mr. Lewis Newsom(e), who was plant manager at Warrenton from 1987 to 1989.

Efforts to reach Mr. Newsom(e) have not been successful. He apparently still lives in Warrenton, but has an unlisted phone number.

What information I gathered from these phone conversations relate to the Report of GSC as follows:

A. Underground Storage Tanks ("UST's"): Mr. Mann did not recall the UST's mentioned in the Report, and said that E.H. Mann never used any UST's at the plant site. It is likely that the UST's were never registered with the State of Georgia by Kearney National or the Debtor.

B. Aboveground Storage Tanks ("AST's"): The Report refers to five AST's and one "vessel." The two largest AST's, according to Mr. Bonner, were storage for petroleum-based "process oils" that were used in mixing the rubber components prior to the vulcanization process. Mr. Mann recalled that a supply tanker overloaded these tanks once, creating a significant surface spill. That is borne out in the Report, Table I, where sample #2 showed TPH levels of 100,000 ppm at the surface. That the product was a heavy petroleum product seems to be evidenced by sample #2A, showing only 140 ppm TPH at a 3-foot depth.

The "silver" AST referenced in samples #5 and #5A was used to store propane fuel.

The AST located inside the large building was used to store boiler water.

No information was obtained about the "rusted" AST (samples #4 and #4A), nor the "vessel" evidenced to be leaking a "petroleum product" (samples #6 and #6A). Quite possibly this was the mixing tank in which the process oils were used. Here again is noted a significant reduction in TPH levels between the surface and 3-foot depth samples.

C. Drums: Little information was learned about drum materials used at the site. Mr. Bonner recalled using drummed solvents in the valve production process, in gluing valve stems to the inner tube, but did not identify the specific solvent. The Report implies that "a large number of these [drum contents] are probably petroleum products or lubricants," but no real identification efforts were made by GSC.

D. Hazardous Materials: The Report in Section 5.2 states "several hazardous chemicals were currently being stored at the property" in metal drums, cardboard drums and bags. Yet no specific hazardous materials, as defined in 40 CFR 261 are identified. None of the dry chemicals contained in Table II are listed hazardous materials (40 CFR 261 Subpart D). Thus, the usage of the environmentally emotionally charged term "hazardous chemicals" may be premature.

However, the unknown drum materials could be a bigger problem than the AST material, especially if they contain(ed) strong and/or chlorinated solvents. Attempts should be made to identify the drum materials if at all possible. Even if not a source of contamination, the drum materials need to be identified as hazardous or nonhazardous waste. In the absence of purchasing records, or finding Mr. Newsom(e), this could be done by means of a physical inventory, noting any labels or product ID numbers on the drums.

The GSC assessment work apparently did not include groundwater samples. In the absence of any identified groundwater contamination, and with no sure hazardous material contamination yet identified, the Site at present can be said to most likely evidence petroleum TPH contamination from surface spillage, and as such, does not seem to constitute a danger to public health or safety. But assessment work could be considered incomplete at this time and the Trustee, Steve Wallace, should continue efforts to identify or confirm:

1. drum contents;
2. the "rusted" AST contents;
3. the open-topped "vessel" purpose or contents; and
4. the type of transformer owned by Georgia Power at the Site that shows evidence of past leakage, i.e., does it contain PCB's?

As Warrenton is close to Augusta, Mr. Wallace may have better luck in contacting Lewis Newsom(e).

BEB

BEB:dlr

02657\00001\dlr4625

PHASE I
ENVIRONMENTAL SITE ASSESSMENT

Project:

WARRENTON RUBBER COMPANY
WARRENTON, GEORGIA

Prepared For:

SHERMAN & HEMSTREET
123 Eighth Street
Augusta, GA 30901

Realtors

Prepared By:

GSC ENVIRONMENTAL LABORATORIES, INC.

ENVIRONMENTAL TESTING
INSPECTIONS - SURVEYS

GSC ENVIRONMENTAL LABORATORIES

REPORT

THIS REPORT RELATES ONLY TO THE SPECIFIC SAMPLES TESTED AND/OR SPECIFIC INSPECTIONS PERFORMED AND MUST NOT BE REPRODUCED EXCEPT IN FULL AND ONLY WITH THE WRITTEN APPROVAL OF THE LABORATORY

April 30, 1992 Report No: 166-1002-02

Sherman & Hemstreet
123 Eighth Street
Augusta, GA 30901

Attn: Mr. Ralph Kitchens

Subject: PHASE I ENVIRONMENTAL SITE ASSESSMENT
Warrenton Rubber Company
Warrenton, GA

Dear Mr. Kitchens:

According to your instructions, **GSC ENVIRONMENTAL LABORATORIES, INC.** has completed a PHASE I ENVIRONMENTAL SITE ASSESSMENT at the subject project. The following pages of this report contain the results of the Assessment.

GSC ENVIRONMENTAL LABORATORIES, INC.

Joe W. Troutman
Vice-President

JWT/mgt

1824 A-3 WYLDS ROAD — AUGUSTA, GA 30909 — (404) 737-0185

TABLE OF CONTENTS

1.0 INTRODUCTION

2.0 SCOPE OF SERVICES

3.0 SITE OBSERVATIONS

4.0 RECORDS SEARCH

5.0 ASSESSMENT RESULTS

- 5.1 GEOLOGIC CHARACTERISTICS
- 5.2 HAZARDOUS MATERIALS HANDLING/STORAGE
- 5.3 UNDERGROUND STORAGE TANKS
- 5.4 ABOVE GROUND STORAGE TANKS
- 5.5 SOIL TESTING
- 5.6 SUSPECT ASBESTOS CONTAINING MATERIAL IDENTIFICATION

6.0 SUMMARY

TABLE I

TABLE II

ATTACHMENT I PLAT OF PROPERTY (REPRINT)

ATTACHMENT II DEBRIS ANALYSIS REPORT

ATTACHMENT III PHOTOGRAPHS

1.0 INTRODUCTION

1.1 According to instructions received from the client, GSC Environmental Laboratories, Inc. has conducted a Phase I Environmental Site Assessment of the property located on Georgia Highway 16 in Warrenton, Georgia. Attachment I to this report shows a reprint of the plat.

1.2 The Assessment was initiated at the request of Mr. Ralph Kitchens.

1.3 This Assessment has been conducted utilizing an established protocol in conjunction with data collected for this site along with our knowledge of similar conditions. To the best of our knowledge and belief, the data contained herein is true and correct as represented. However, this should not be considered as an exhaustive undertaking where all possible pollutants or environmental hazards are identified nor should any warranty, guarantee, or certification of suitability be assumed.

2.0 SCOPE OF SERVICES

2.1 The Phase I Environmental Site Assessment conducted for this property consisted of the following items:

A. A site visit and visual observations of the area.

B. A records search, including 50 year title chain, other title documents when available, and aerial photographs to determine prior ownership and/or use.

C. A records search of various state and federal agencies' listings of hazardous sites and/or waste generators.

D. A visual observation of the building located on the property for determination of any potential asbestos containing materials.

E. At the request of the client, securing several soil samples to be analyzed for Total Petroleum Hydrocarbons (TPH).

F. Providing a Summary of the Assessment.

2.2 The data in this report represent the entire scope of services for this Assessment. Conclusions drawn or opinions formed by others from this data are their own, and shall in no way obligate GSC Environmental Laboratories, Inc.

3.0 SITE OBSERVATIONS

3.1 The property consists of approximately 11.11 acres with two existing buildings, 2 metal storage sheds and a double-wide mobile office trailer. The largest building was approximately 5% office area and the remainder was used for storage/production activities. The other building was used for storage/production activities. The typical construction for the two buildings is structural steel and masonry.

3.2 Prior to development as a commercial property, which appears to have occurred in the 1972 to 1974 time period, the property appears to have been either undeveloped or used for agricultural purposes. Prior to Warrenton Rubber Company which closed in 1989 the facility was used for Retreaders Tire Supply Company. Currently the property is sitting idle.

3.3 The property is currently not maintained. Vegetation covers the area in the expected portions of the property. In general the vegetation appears healthy with no undue stress, such as that expected from hazardous materials. However, there are several areas where vegetation appears to be stressed or nonexistent.

3.4 Most of the property drains reasonably well. In general the drainage flows toward the Eastern corner of the property. There is a pond on the front of the property where the dam has washed out and there are several other areas where ponding occurs.

3.5 There are several creosote treated timbers at various locations around the parking lot. These could create a future hazard.

3.6 The driveways and parking lots are not paved. No evidence was observed to suggest spills from automobiles or other vehicles had occurred, however we would assume the normal spillage and leaking from automobiles has occurred in these areas.

3.7 One large ground mounted transformer (which belongs to Georgia Power Company) is located on the property. There is evidence of past leaking from this transformer. The large building has at least five transformers inside and the other building has five transformers inside. This may not be an absolute total and no evidence of leaking or past leaking was observed. It should be noted that some transformers contain PCB's and if this is a concern then further investigation should be undertaken.

Ga. Power

3.0 SITE OBSERVATIONS (continued)

3.8 There are approximately 120 metal drums scattered throughout the property with the concentration of these being located in the two buildings or in close proximity to same. These drums are in various stages from empty to full. No attempt was made to determine the contents of these drums, however a large number of these are probably petroleum products or lubricants. Several of these drums have been leaking and/or are currently leaking and others are overflowing due to rain water.

3.9 Several locations were observed along the Southern side of the large building where lines run out or have run out of the building and terminate. The material coming through the lines appears to have been released onto gravel.

3.10 Two underground storage tanks were located in the field directly behind the largest building.

3.11 Two above ground storage tanks were located in the field directly behind the largest building. Two additional larger above ground storage tanks were located adjacent to the western property boundary. One above ground storage tank was observed in the southeastern corner of the large building. In addition a portion of a vessel (without a top) was located adjacent to the smaller building. Several lines were running to and from this vessel, current leaking was observed and the liquid appeared to be a petroleum product.

3.12 Storage of various dry chemicals was observed at locations throughout the buildings and outside the large building.

3.13 Suspected asbestos containing debris was sampled and analyzed.

3.14 Housekeeping is non existent on the inside and outside of the buildings. Trash, equipment (some with large amounts of lubricants), drums, old batteries (some have been crushed), innertube material, various metal discards and electric motors are scattered throughout the property. This material is exposed to the elements.

3.0 SITE OBSERVATIONS (continued)

3.15 Most adjacent property is currently used for agricultural purposes or is undeveloped. The only exception to this is the property to the Northeast. This property was developed in approximately 1961 as Garland Knitting Mill and is currently Health Tex Incorporated. The Health Tex property has two above ground storage tanks that are visible and it was not determined whether these tanks are currently being used or what was in these tanks in the past. The property directly to the North had a warehouse that has burnt in the recent past. Interview indicated this warehouse had a large number of tires inside. The property off the Eastern corner has a pollution control project which appears to be a waste treatment pond. This pond is downgradient and should not be a problem.

4.0 RECORDS SEARCH

4.1 A records search was conducted to collect data on prior use and to determine if the property is shown on state or federal listings for hazardous material contamination or clean-up sites.

4.2 The search revealed the property was either undeveloped or was utilized for agricultural purposes prior to being commercially developed. Interviews and records indicate the probable date for commercial development most probably occurred from 1972 to 1974. Aerial photos from 1976, 1980 and 1989 were observed to support this position.

4.3 The property was not found on state and/or federal listings for hazardous material clean-up or spillage events. Additionally no property in Warren County is on the EPA National Priorities List.

4.3.1 An adjacent property (Health Tex Inc.) was found on the RCRA Notifiers List.

5.0 ASSESSMENT RESULTS

5.1 GEOLOGIC CHARACTERISTICS - According to the USDA Soil Survey the property is composed primarily of Appling sandy loam with 2 to 10 percent slopes. Permeability is moderate. The clayey subsoil retards absorption of effluent. The Northern side of the property is Altavista sandy loam with 0 to 2 percent slopes. This soil has moderate permeability and commonly has a water table at a depth of 18 inches to 30 inches.

5.2 HAZARDOUS MATERIALS HANDLING/STORAGE - Several hazardous chemicals were currently being stored at the property. Some of these materials were in metal drums, some were in cardboard drums and some were in bags. A determination of which chemicals are on site is out of the scope of this Phase I Assessment, however some of the dry chemicals were noted using labels on containers. Some of the names may be manufacturers trade names or trade names (see TABLE II of this report).

5.3 UNDERGROUND STORAGE TANKS - Two underground storage tanks were found on the property. These tanks are located directly behind the large building and no attempt was made to determine the contents. No other underground storage tanks were observed nor was there any physical evidence observed to suggest there had been at an earlier date.

5.4 ABOVE GROUND STORAGE TANKS - Five above ground storage tanks were observed on the property. Two of these tanks are located directly behind the large building and no attempt was made to determine the contents. Two additional larger above ground storage tanks were located adjacent to the western property boundary and no attempt was made to determine the contents. One above ground storage tank was observed in the southeastern corner of the large building and no attempt was made to determine the contents of this tank however it is possible this tank was used for water storage. In addition a portion of a vessel (without a top) was located adjacent to the smaller building. Several lines were running to and from this vessel, current leaking was observed and the liquid appeared to be a petroleum product. No other above ground storage tanks were found on the property, nor was there any physical evidence observed to suggest there had been at an earlier date.

5.0 ASSESSMENT RESULTS (continued)

5.5 SOIL SAMPLES - Nineteen soil samples were taken and analyzed for TPH. These samples were taken in obvious or suspected spill sites. State of Georgia regulations would permit a result of up to 100 ug/G in some situations, however it is our opinion this property would probably be limited to the Method Detection Limit (see TABLE I of this report).

5.6 SUSPECT ASBESTOS CONTAINING MATERIAL IDENTIFICATION - The thermal system insulation (pipe fittings) in the large building, the jacketed boiler (insulation, gaskets and lining), all floor tile, all ceiling tile, the insulation on tire molds, any mastic and any roofing material should be assumed to be asbestos containing material (ACM) unless tested and determined to be non-ACM. Debris in the large building where pipe fitting materials had been damaged was sampled and was determined by analysis to not contain asbestos (see ATTACHMENT II of this report).

6.0 SUMMARY

6.1 We found only the potential hazards listed previously at this site. Also, we noted no evidence in the records review to indicate the presence of hazardous materials not previously mentioned.

6.1.1 No evidence was observed to support a conclusion that additional above or below ground storage tanks ever existed. This assessment does not conclude that no other above or below ground storage tank currently exists on this site, the only conclusion in regards to this is no physical evidence exists to support same.

6.2 Where the thermal system insulation (pipe fittings) in the large building, the jacketed boiler (insulation, gaskets and lining), all floor tile, all ceiling tile, the insulation on tire molds, any mastic and any roofing material should need to be disturbed it should be sampled on an individual basis to determine if the material is ACM. If it is determined to be ACM, it should be dealt with in accordance with the laws and regulations of the State of Georgia.

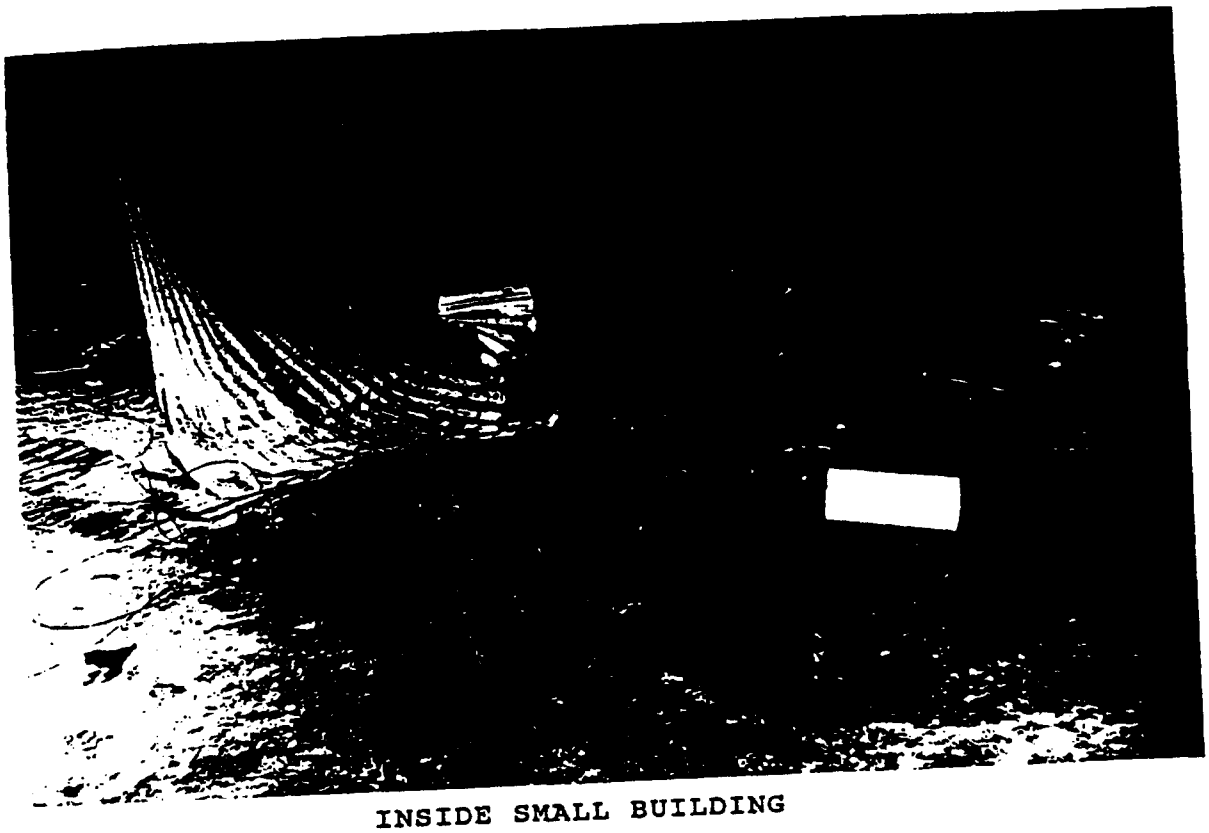
6.3 A housekeeping and maintenance program should be implemented inside and outside the buildings to prevent further contamination.

6.4 The underground storage tanks should either be removed or any product within same should be removed to prevent further contamination.

6.5 The above ground storage tanks should either be removed or any product within same should be removed to prevent further contamination.

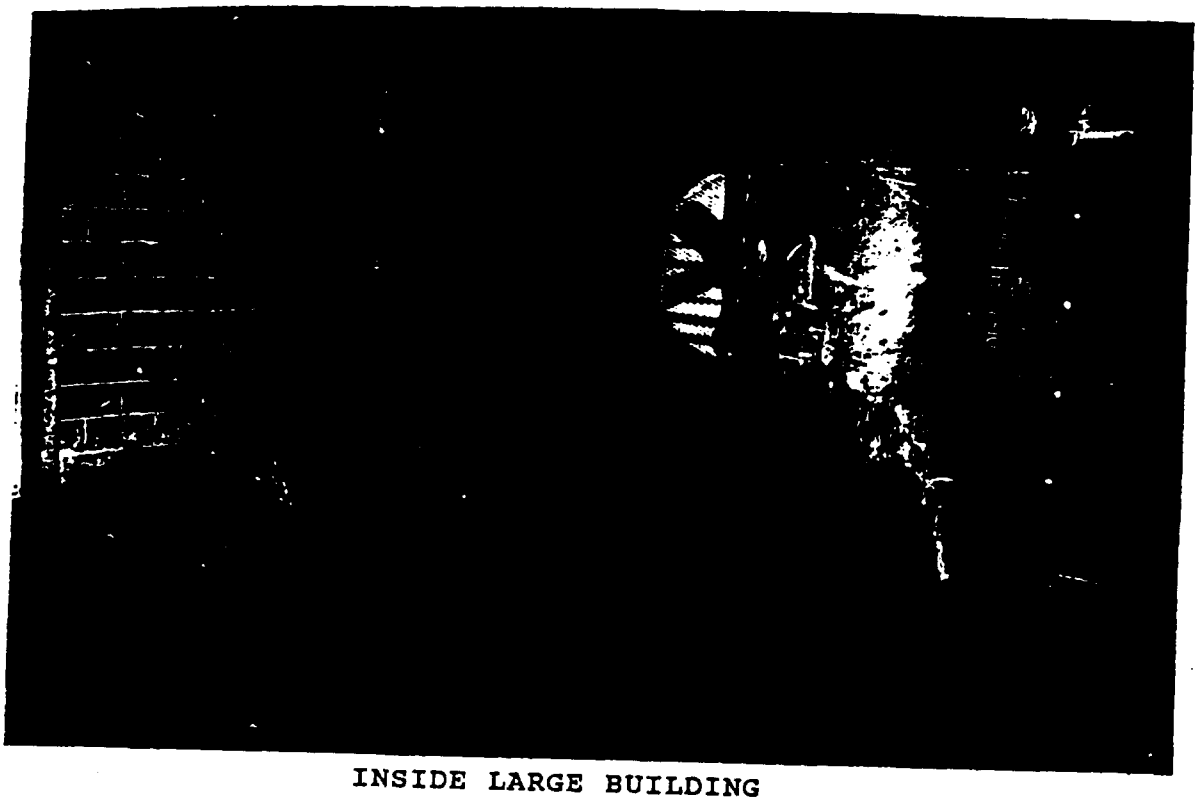
6.6 Based on current observations, we do recommend a Phase II Environmental Assessment.

6.6.1 No specific recommendations are being made for sampling, however if a Phase II Environmental Assessment is desired, on your request we would proceed with the design of a Phase II Assessment for your approval.



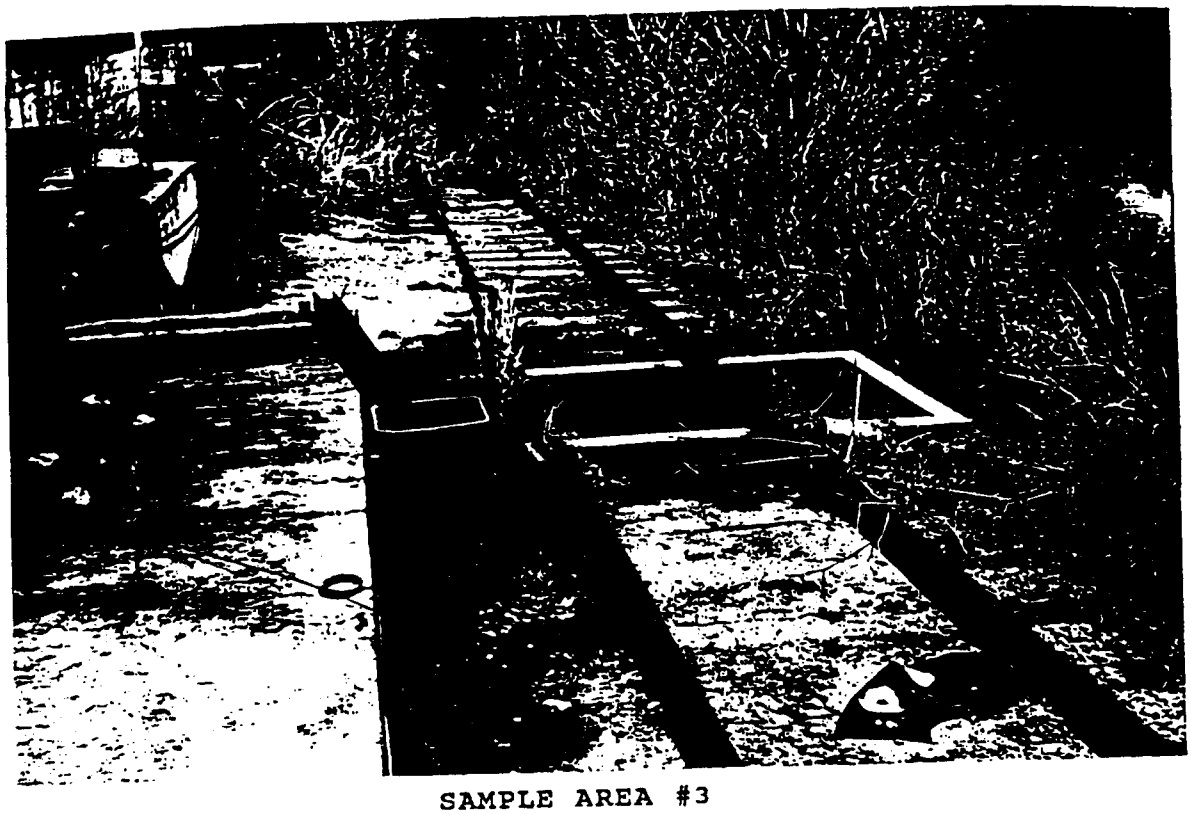
INSIDE SMALL BUILDING

INSIDE LARGE BUILDING



INSIDE LARGE BUILDING

JACKETED BOILER

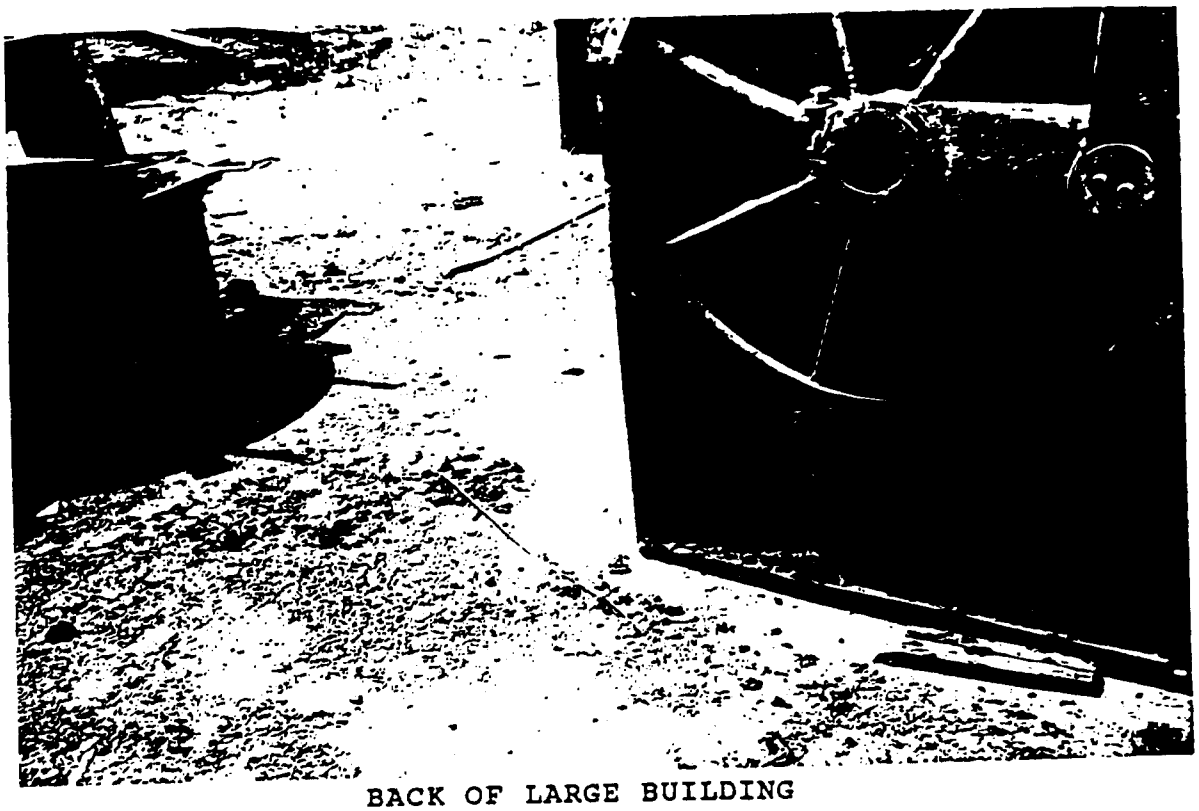


SAMPLE AREA #3

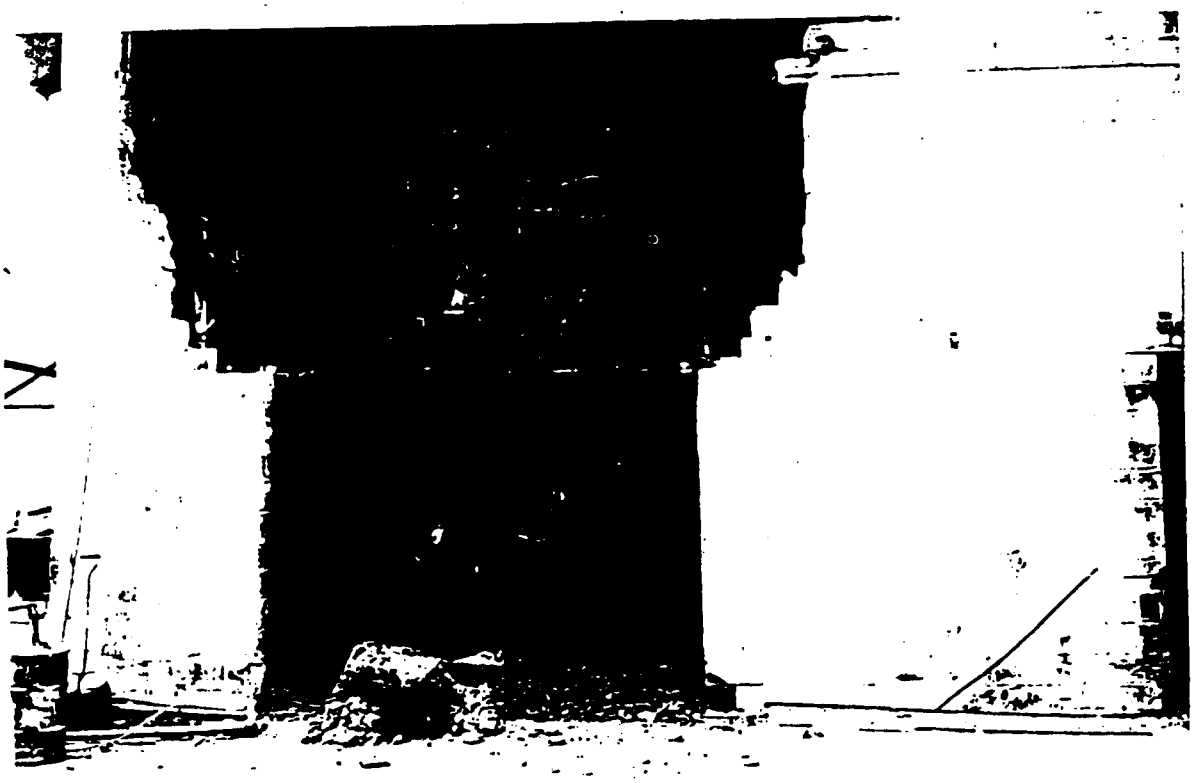
SAMPLE AREA #7

SAMPLE AREA #7

SAMPLE AREA #10



BACK OF LARGE BUILDING



SMALL BUILDING

TABLE I

TABLE I

SOIL ANALYSIS FOR TOTAL PETROLEUM HYDROCARBONS

LAB NO	SAMPLE ID	RESULT	MDL	UNITS	METHOD
M9204018	# 1	390	40	ug/G	418.1
M9204019	# 1A	60	40	ug/G	418.1
M9204020	# 2	100000	40	ug/G	418.1
M9204021	# 2A	140	40	ug/G	418.1
M9204022	# 3	670	40	ug/G	418.1
M9204023	# 3A	73	40	ug/G	418.1
M9204024	# 4	89000	40	ug/G	418.1
M9204025	# 4A	ND	40	ug/G	418.1
M9204026	# 5	ND	40	ug/G	418.1
M9204027	# 5A	ND	40	ug/G	418.1
M9204028	# 6	180000	40	ug/G	418.1
M9204029	# 6A	8400	40	ug/G	418.1
M9204030	# 7	140000	40	ug/G	418.1
M9204031	# 7A	3300	40	ug/G	418.1
M9204032	# 8	110000	40	ug/G	418.1
M9204033	# 8A	90	40	ug/G	418.1
M9204034	# 9	ND	40	ug/G	418.1
M9204035	# 10	3000	40	ug/G	418.1
M9204036	# 10A	ND	40	ug/G	418.1

ND: Not detected at concentrations greater than the method detection limit.
MDL: Method Detection Limit
ug/G: Micrograms per Gram (Equates to Parts Per Million)

SAMPLE ID	DEPTH	SAMPLE LOCATION
1	surface	underground storage tanks
1A	5 feet	underground storage tanks
2	surface	large above ground storage tanks
2A	3 feet	large above ground storage tanks
3	surface	railroad spur
3A	3 feet	railroad spur
4	surface	rusted above ground storage tank
4A	3 feet	rusted above ground storage tank
5	surface	silver above ground storage tank
5A	3 feet	silver above ground storage tank
6	surface	vessel by large transformer
6A	3 feet	vessel by large transformer
7	surface	south side of large building (middle)
7A	2 feet	south side of large building (middle)
8	surface	south side of large building (east corner)
8A	2 feet	south side of large building (east corner)
9	3 feet	Pond on southeast corner
10	surface	by service road
10A	2 feet	by service road

TABLE II

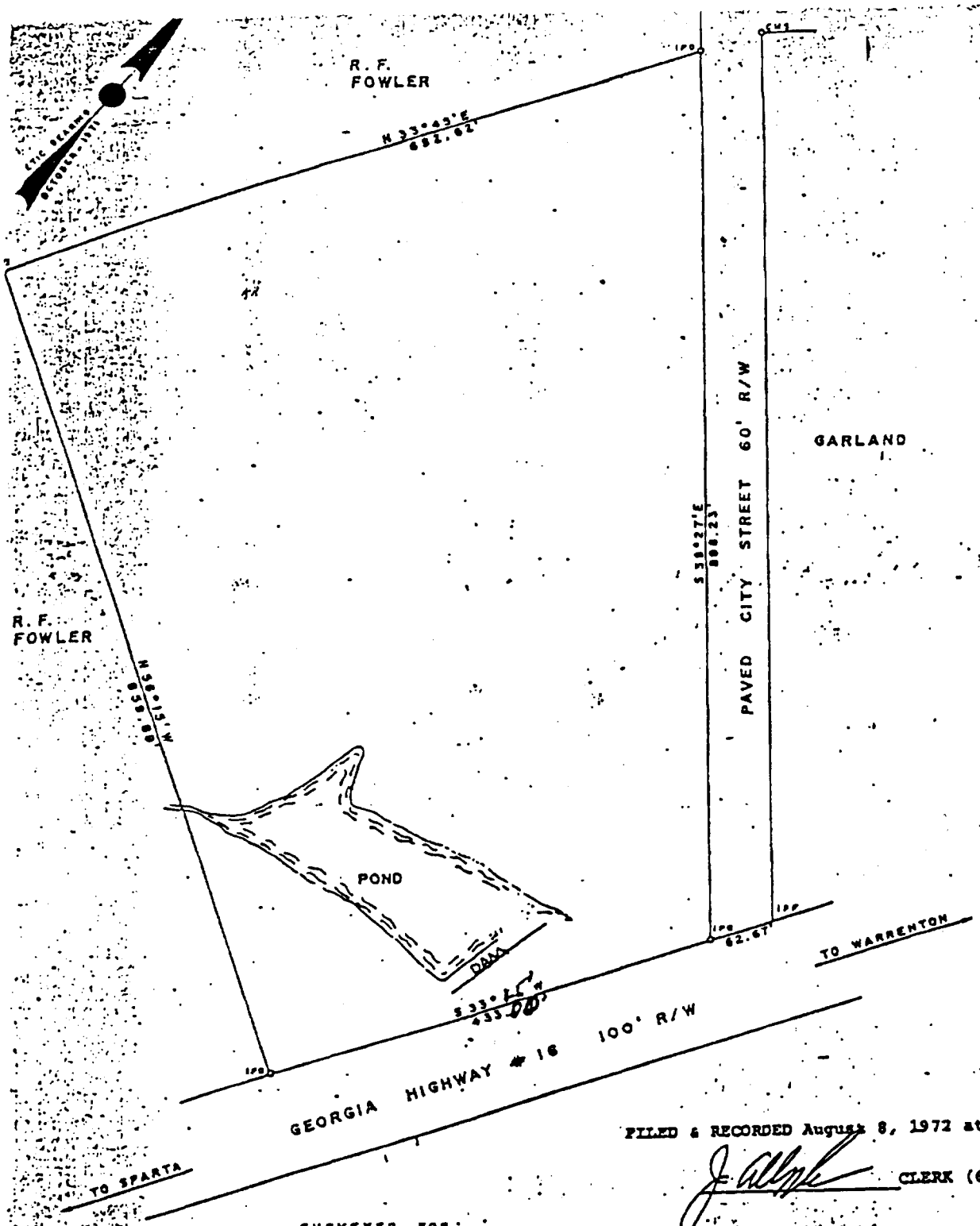
TABLE II

OBSERVED DRY CHEMICALS

AMOUNT	CHEMICAL
1 pallet	Zinc Oxide
1 pallet	Tetramethyl thiuram monosulfide
2 pallets	Monsanto accelerator
19 pallets	Hydrous Magnesium Silicate
3 pallets	Carbon black
3 cardboard drums	Methazal powder
4 bags	Stabelite ester resin
several bags	sulfur
6 large bags	unknown (possibly carbon)
2 pallets	unknown
7 cardboard drums	unknown

ATTACHMENT I

PLAT OF PROPERTY (REPRINT)



FILED & RECORDED August 8, 1972 at 9:30 a. m.

J. Allyn CLERK (6482)

SURVEYED FOR:

J. P. WILHOIT, JR. & H. C. Jessee &

11.11 ACRES J. S. Singletary

425TH G.M.D.

WARREN COUNTY, GEORGIA

SCALE: 1" = 100 FEET

DATE: MAY 16, 1972

In my opinion, this plat is a correct representation of the land platted, and has been prepared in conformity with the minimum standards and requirements of law, surveyed by Forest & Land Svcs., Inc., Warrenton, Georgia, under the direction of T. Larry Rachels, R.L.S.

T. Larry Rachels, No. 1730

GEORGIA REGISTERED No. 1730 Expires 12-3-72 LAND SURVEYOR T. LARRY RACHELS

GSC ENVIRONMENTAL LABORATORIES

REPORT

THIS REPORT RELATES ONLY TO THE SPECIFIC SAMPLES TESTED AND/OR SPECIFIC INSPECTIONS PERFORMED AND MUST NOT BE REPRODUCED EXCEPT IN FULL AND ONLY WITH THE WRITTEN APPROVAL OF THE LABORATORY

April 16, 1992 Report Number: 166-1002-01

Client: Sherman & Hemstreet
123 Eighth Street
Augusta, GA 30901
Attn: Mr. Ralph Kitchens

Project: Warrenton Rubber Plant

On April 15, 1992, a representative of GSC ENVIRONMENTAL LABORATORIES INC., collected three (3) bulk sample(s) to be analyzed in accordance with EPA recommended dispersion staining techniques utilizing polarized light microscopy.

The results of samples taken are based on percentage estimates determined by observation of the sample using a stereo microscope.

All samples will be retained for a period of thirty (30) days unless further instructions are received from the client. This report relates only to the samples tested and must not be reproduced except in full and only with the approval of this laboratory.

All results are reported on Form # AS-04 attached to this report.

GSC ENVIRONMENTAL LABORATORIES, INC.

William J. Horning
Laboratory Director

ATT/AS-04

WJH/vjg

1824 A-3 WYLDS ROAD — AUGUSTA, GA 30909 — (404) 737-0185

April 16, 1992

Report Number: 166-1002-01

Table 1

Lab No.	Sample ID	Sample Location & Description	% Asbestos
92040682	01	INSIDE BUILDING 1-DEBRIS	NAO
92040683	02	INSIDE BUILDING 1-DEBRIS	NAO
92040684	03	INSIDE BUILDING 2-DEBRIS	NAO

END OF REPORT

LEGEND
NAO-No Asbestos Observed

GSC ENVIRONMENTAL LABORATORIES, INC.

Form #AS-04
Dec 18, 1990
Rev. 3

BULK SAMPLE ANALYSIS FOR ASBESTOS

Date: 04/16/92

Report No: 166-1002-01

Laboratory No.	92040682	92040683	92040684		
Sample ID	01	02	03		
Color	WHITE	WHITE	WHITE		
Homogeneous	YES	YES	YES		
Type & Percent Asbestos					
Chrysotile					
Amosite					
Crocidolite					
Other					
Total Asbestos	NAO	NAO	NAO		
Type & Percent Other Fibers					
Glass/Wool					
Cellulose	3	3	5		
Other					
Non-Fibrous Material					
Paint					
Binder/Filler	97	97	95		
Other					

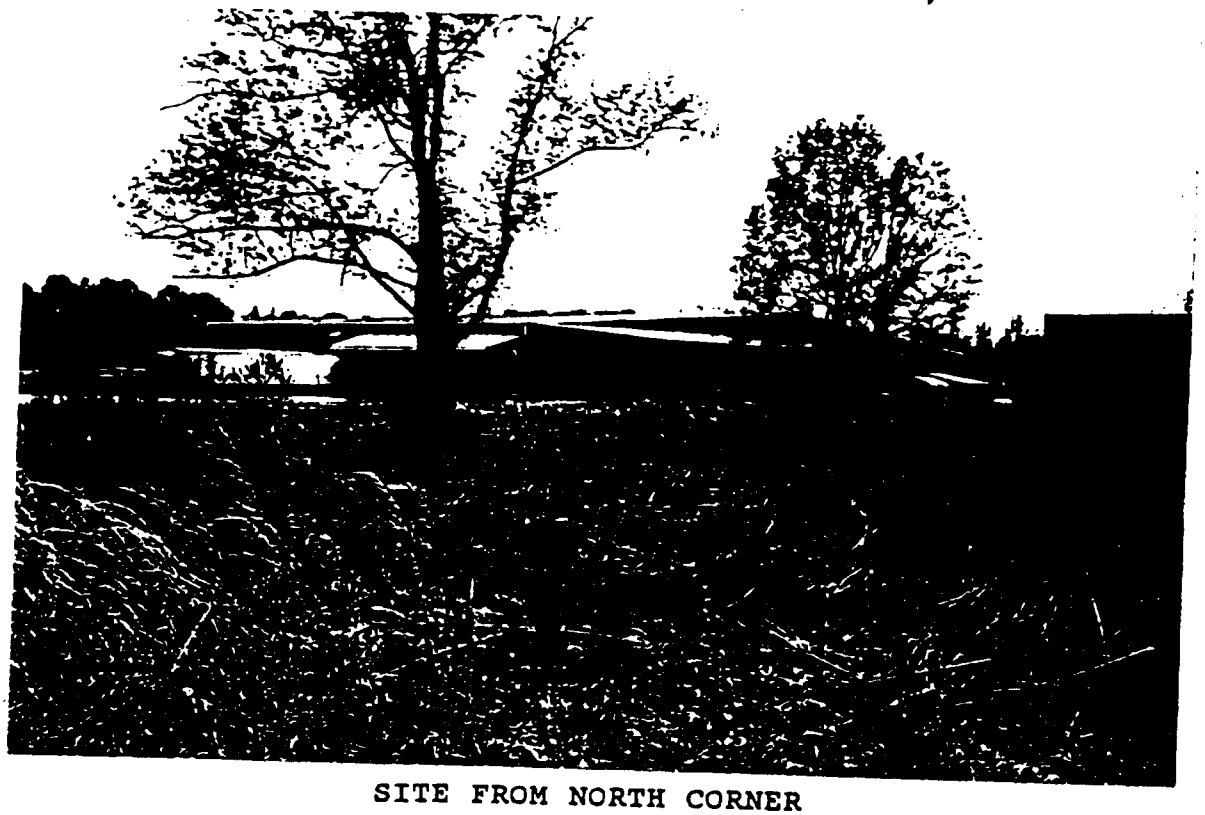
Analyst: B. Forbes

NVLAP Code Number: 1626

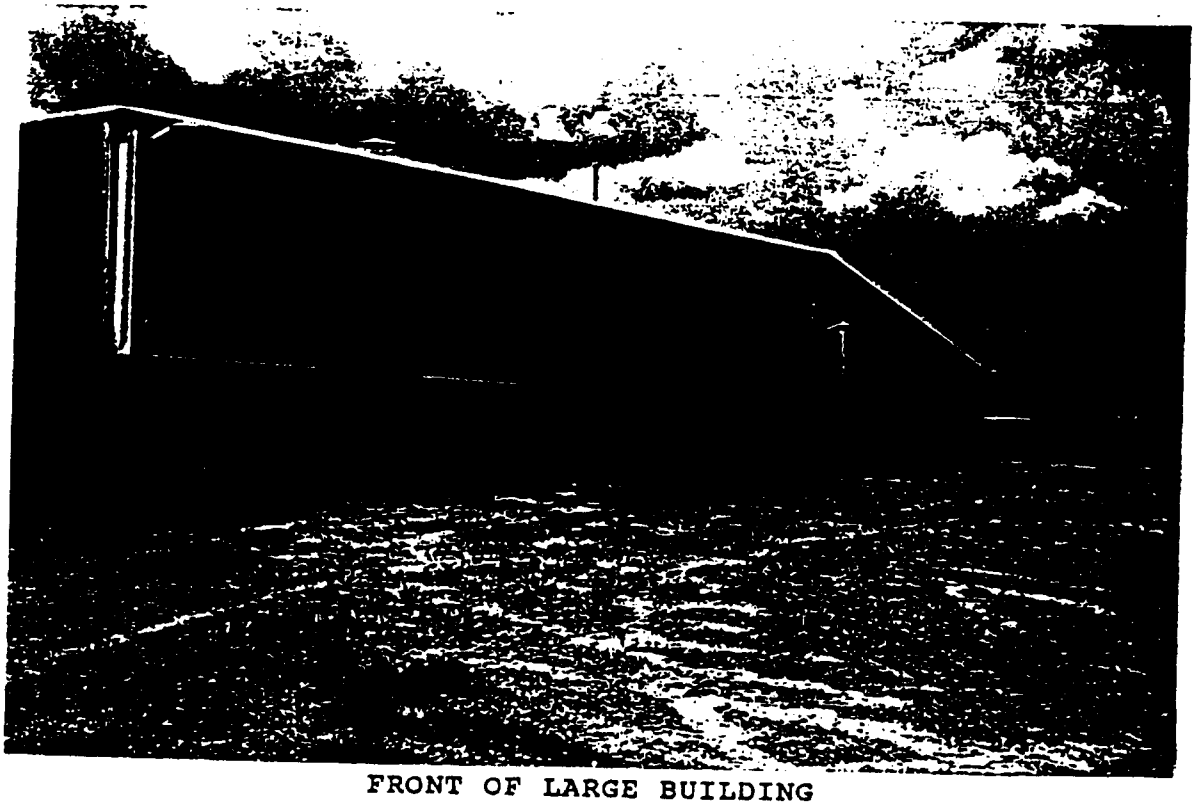
Analysis Method: EPA recommended PLM with dispersion staining. Percentage estimates are based on stereo microscope observation. The results of non-homogeneous and layered samples are based on the analyst's estimated composite for each individual component.

NAO = No Asbestos Observed

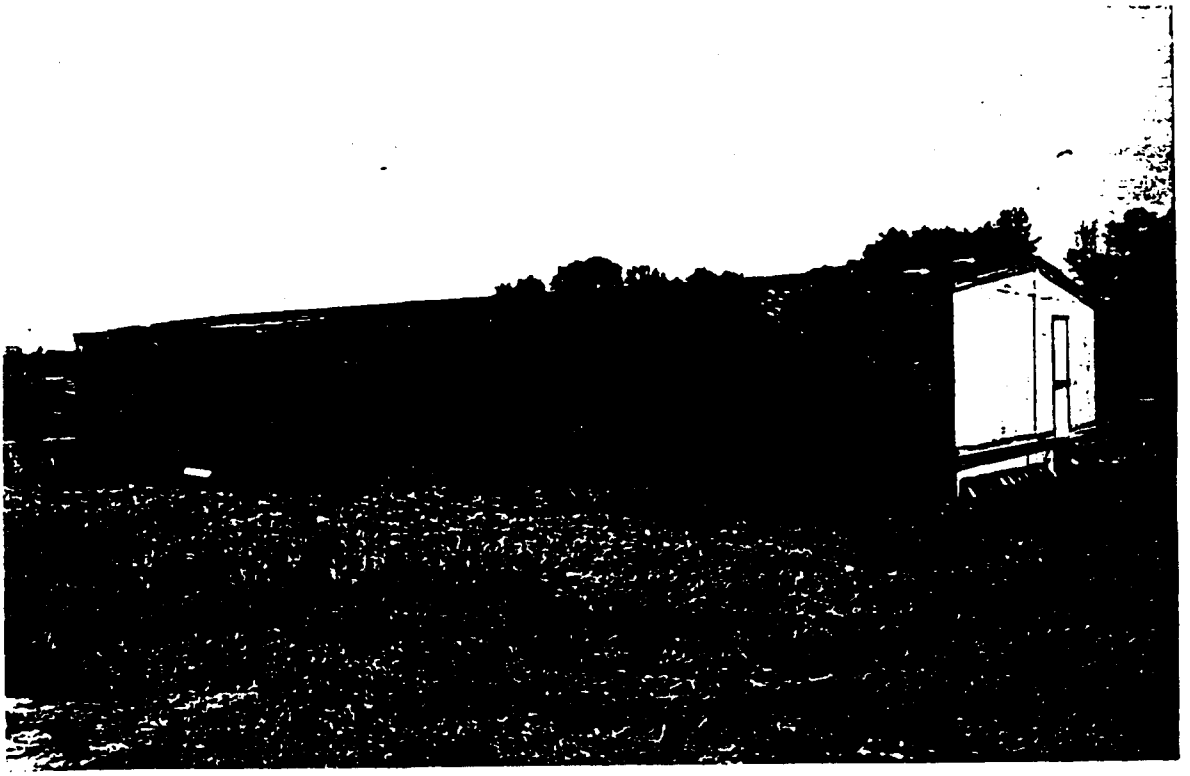
ATTACHMENT III
PHOTOGRAPHS



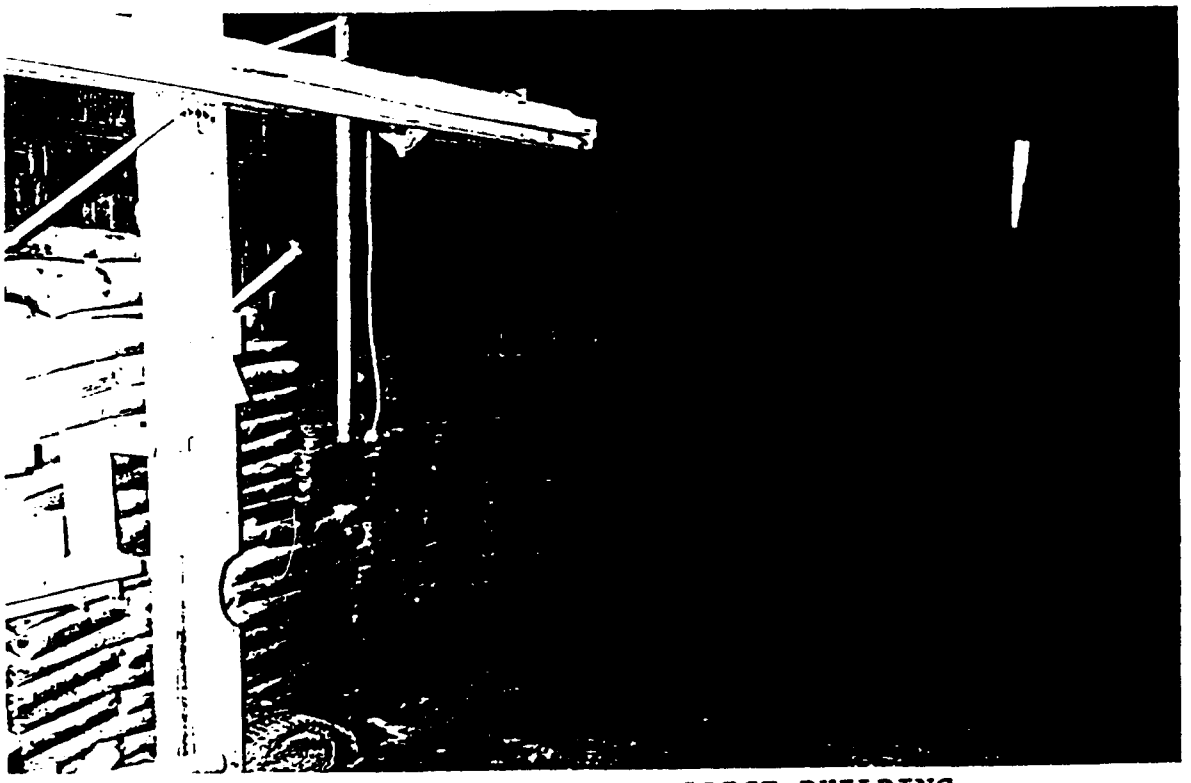
SITE FROM NORTH CORNER



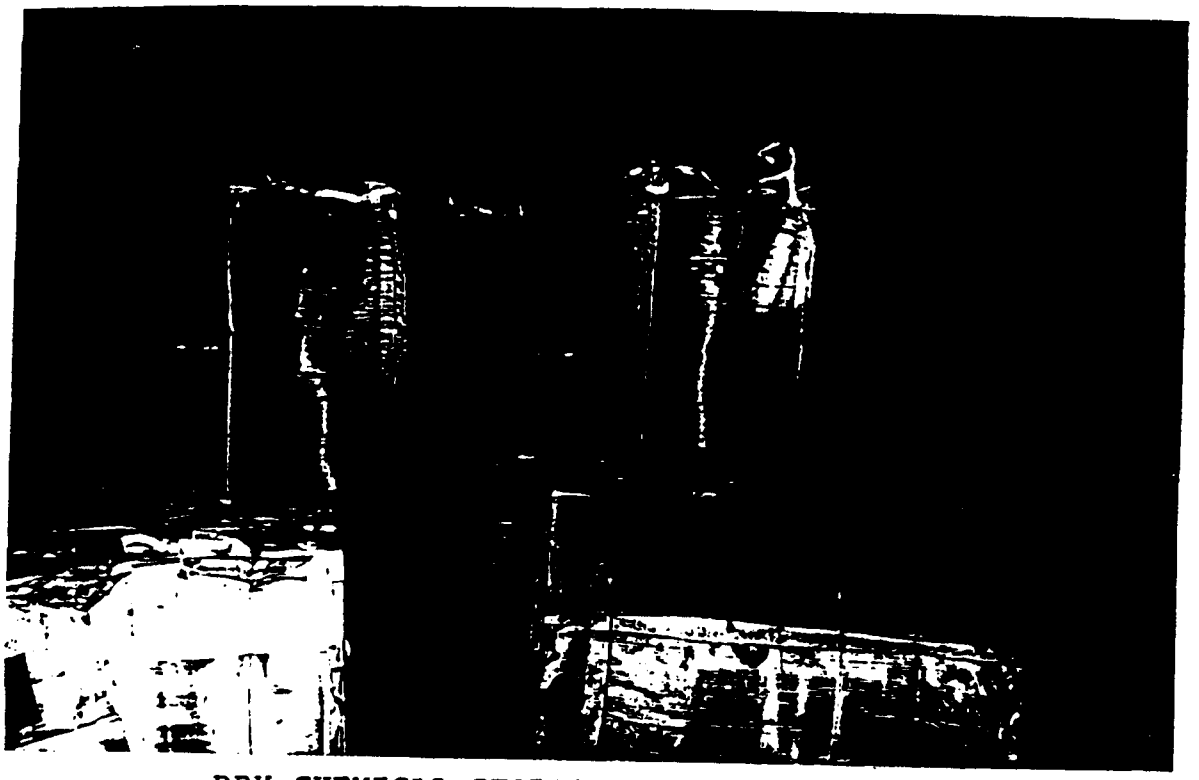
FRONT OF LARGE BUILDING



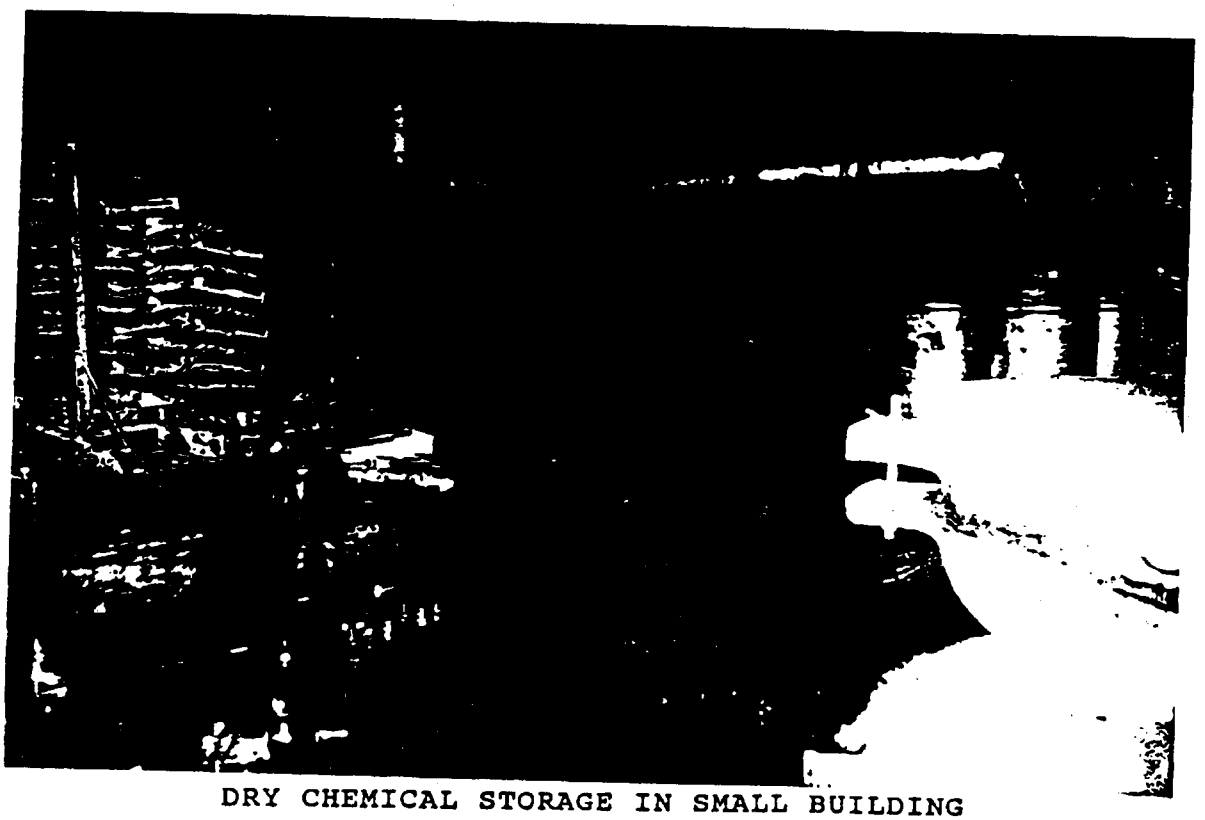
DOUBLE WIDE OFFICE TRAILER



DRY CHEMICAL STORAGE IN LARGE BUILDING

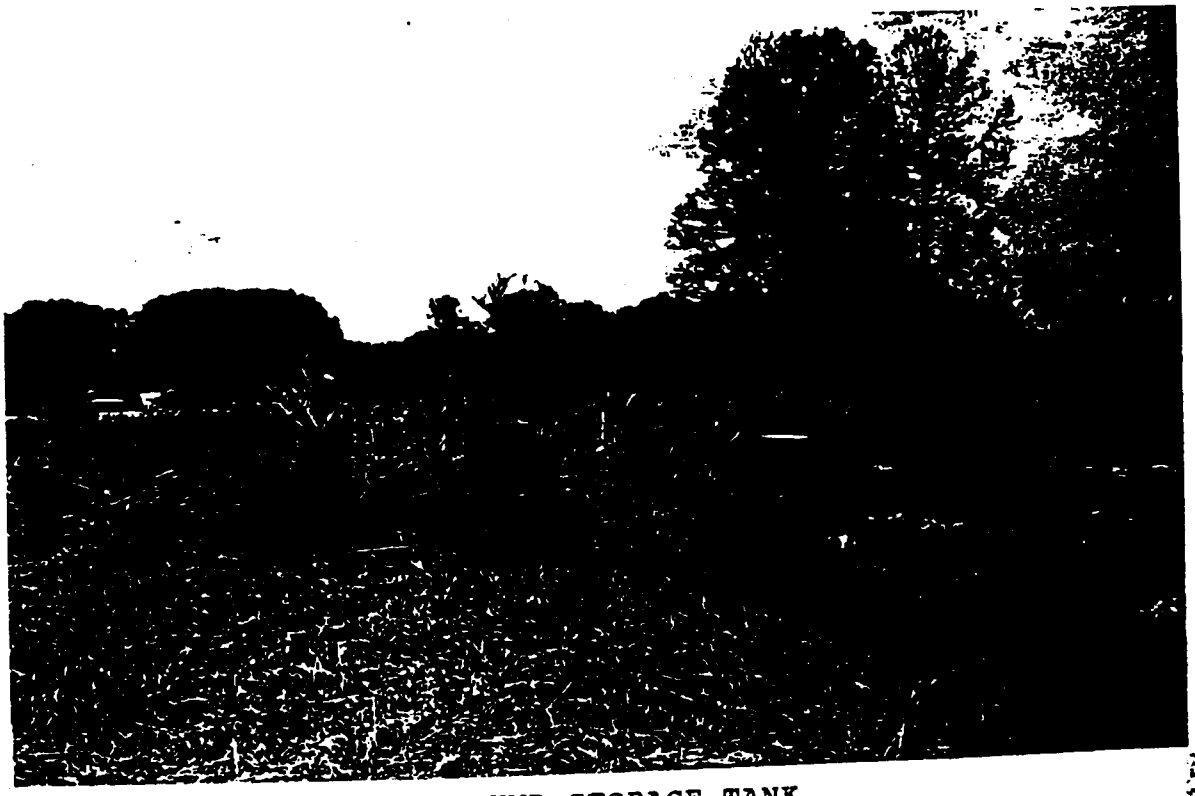


DRY CHEMICAL STORAGE IN SMALL BUILDING

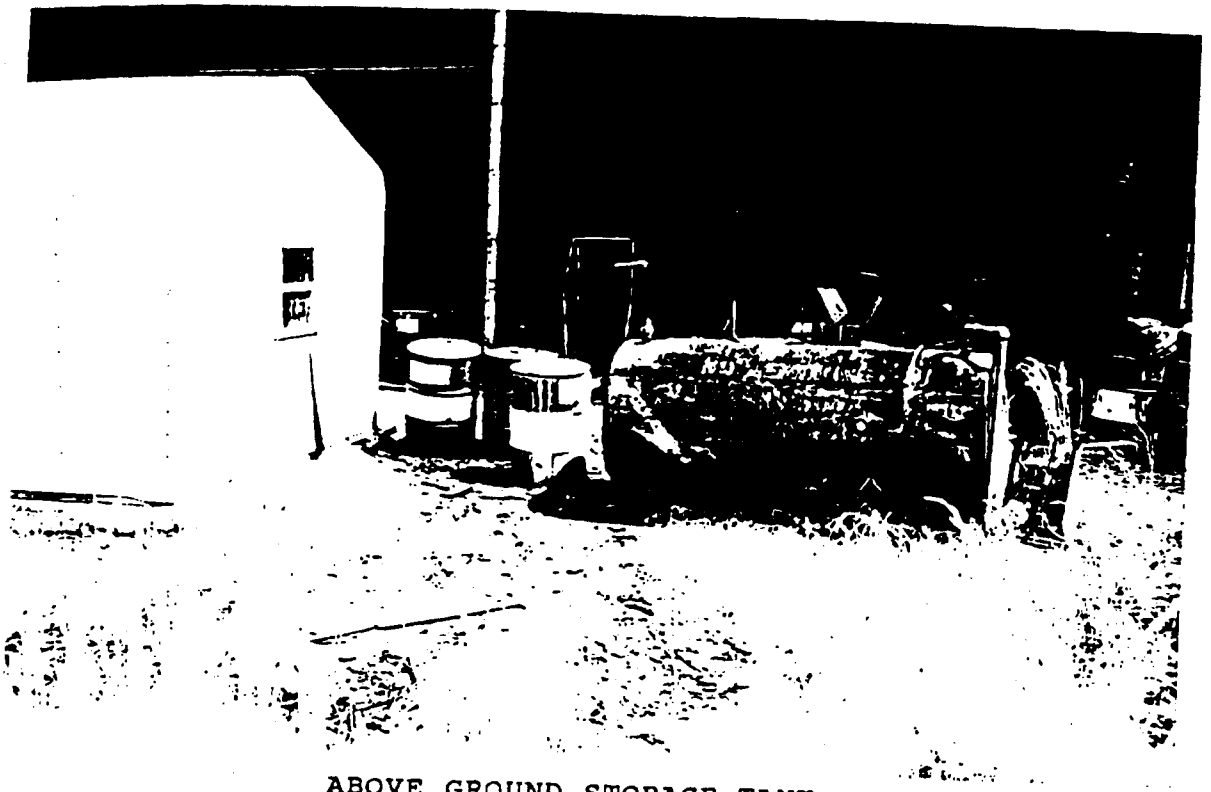


DRY CHEMICAL STORAGE IN SMALL BUILDING

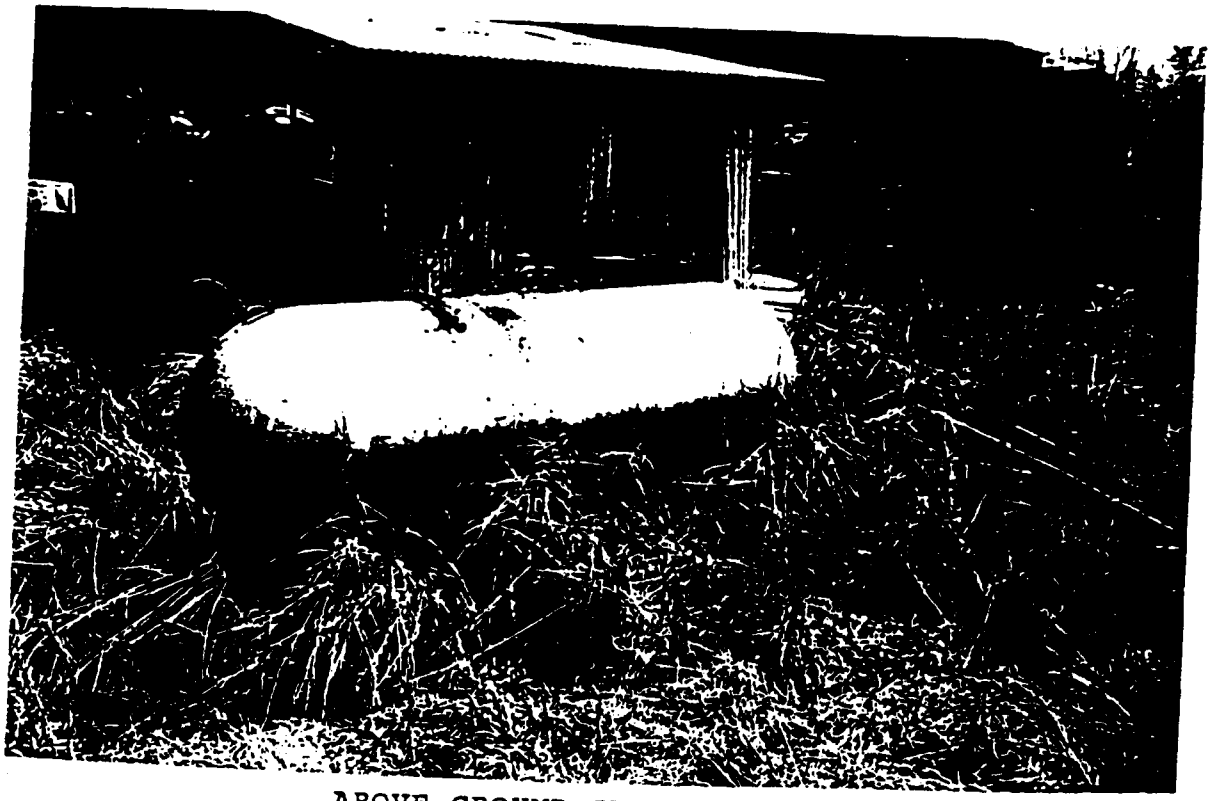
DRY CHEMICAL STORAGE IN SMALL BUILDING



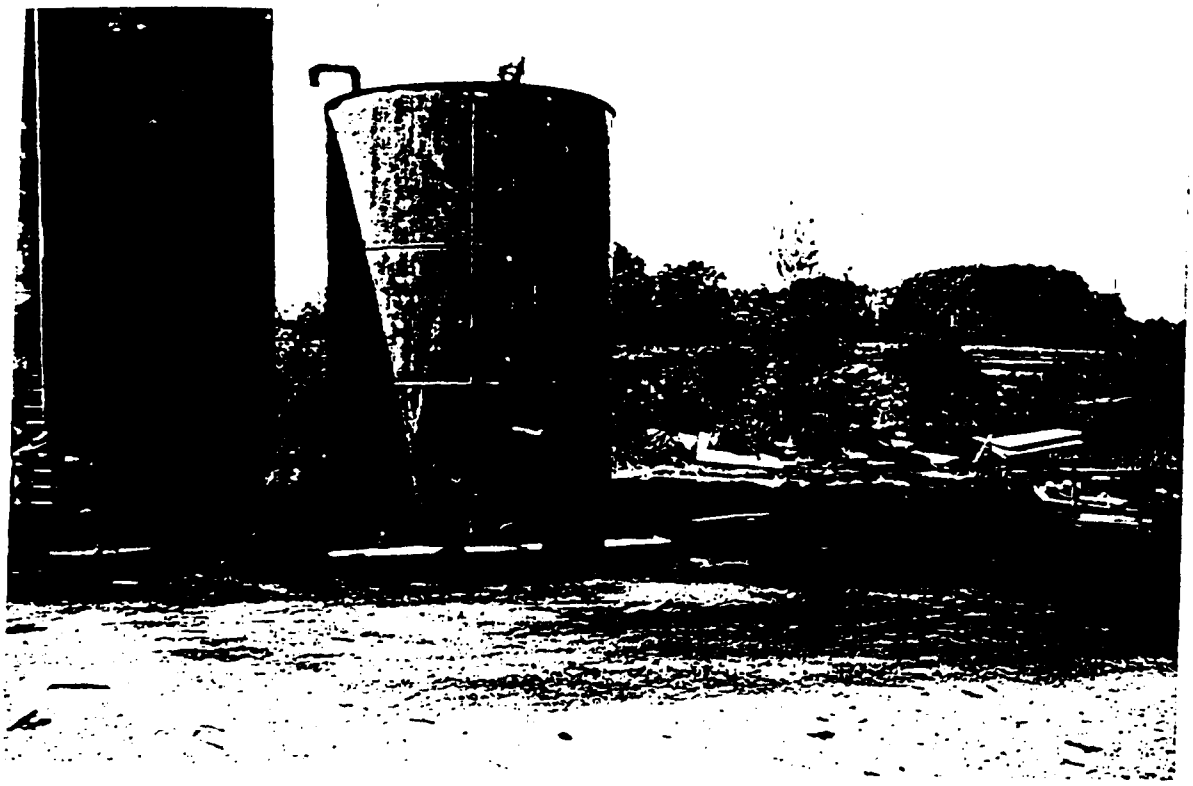
UNDERGROUND STORAGE TANK
SAMPLE AREA #1



ABOVE GROUND STORAGE TANK
SAMPLE AREA #4

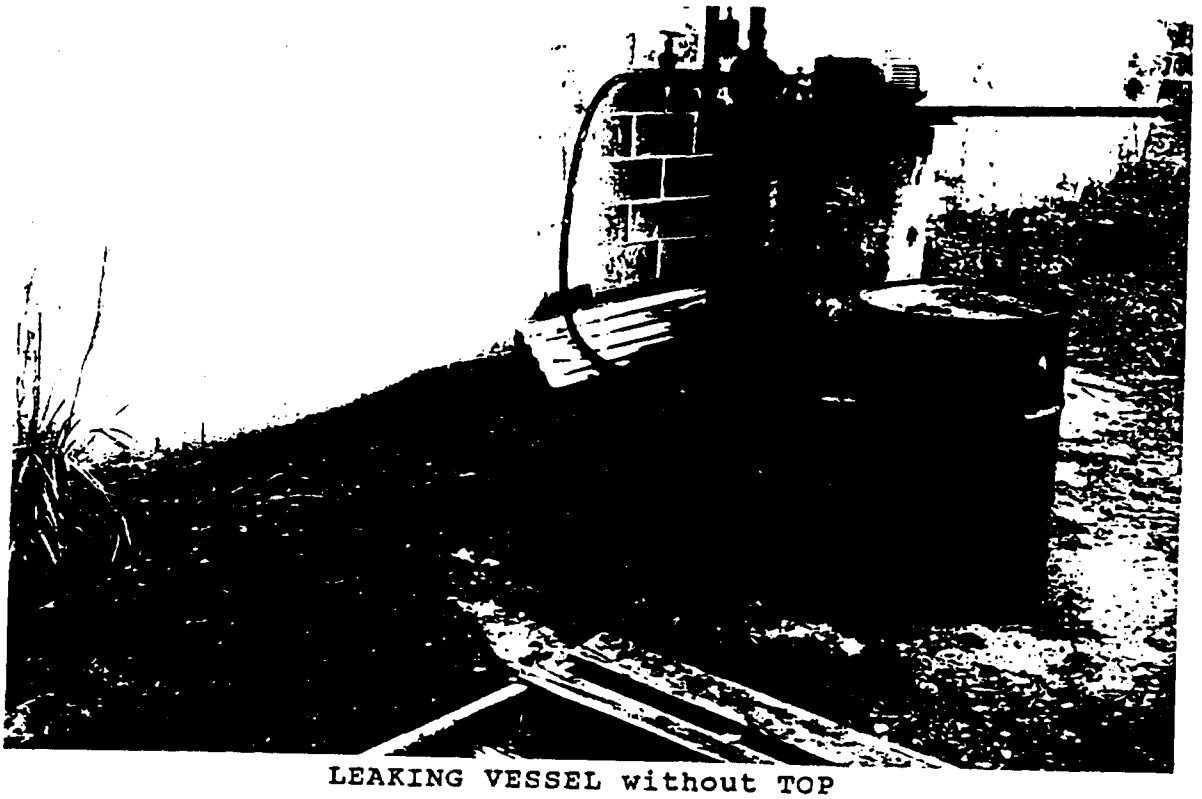


ABOVE GROUND STORAGE TANK
SAMPLE AREA #5



ABOVE GROUND STORAGE TANK and ASSOCIATED SPILL AREA
SAMPLE AREA #2

CONTINUATION OF SPILL AREA



LEAKING VESSEL without TOP
SAMPLE AREA #6

WASTE MATERIAL
SOUTH SIDE OF PROPERTY

BACK OF LARGE BUILDING

BACK OF LARGE BUILDING