



THE MEMPHIS DEPOT TENNESSEE

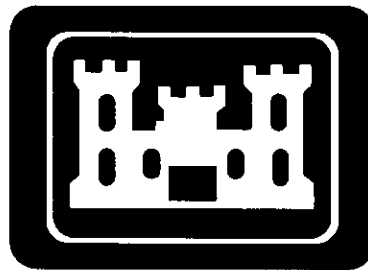
ADMINISTRATIVE RECORD COVER SHEET

AR File Number 654

**FINAL REPORT
CHEMICAL WARFARE MATERIEL
INVESTIGATION/REMOVAL ACTION
DUNN FIELD, FORMER DEFENSE DEPOT
MEMPHIS, TENNESSEE**

PREPARED FOR

U.S. ARMY CORPS OF ENGINEERS
ENGINEERING AND SUPPORT CENTER, HUNTSVILLE



DACA87-97-D-0006
Delivery Order 0012

U.S. Army Corps of Engineers, Mobile District

PREPARED BY.

UXB International, Inc.
Ashburn, Virginia



December, 2001

The views, opinions, and/or findings contained in the report are those of the author(s) and should not be construed as an official Department of Army position, policy, or decision, unless so designated by other documentation.

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List of Acronyms

ABIH	American Board of Industrial Hygiene
ACGIH	American Conference of Governmental Industrial Hygienists
AEL	Airborne Exposure Limit
AIHA	American Industrial Hygiene Association
AR	Army Regulation
ARAR	Applicable or Relevant and Appropriate Requirements
ASR	Archive Search Report
BCT	Base Closure Team
BGS	Below Ground Surface
BRAC	Base Realignment and Closure
CAIS	Chemical Agent Identification Sets
CBDCOM	Chemical and Biological Defense Command
CDC	Center for Disease Control
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CDQMP	Chemical Data Quality Management Plan
CFR	Code of Federal Regulation
CIH	Certified Industrial Hygienist
CK	Cyanogen chloride
CN	Chloroacetophenone or Chloromethyl phenyl ketone
CO	Contracting Officer
COC	Chemical of Concern
COE	Corps of Engineers
CPR	Cardiopulmonary Resuscitation
CPU	Chemical Protective Undergarment
Cu.	Cubic
CWA	Chemical Warfare Agent
CWM	Chemical Warfare Materiel
DA	Department of the Army
DAAMS	Depot Area Air Monitoring System
DANC	Decontaminating Agent, non-corrosive
dB	Decibel
DDMT	Defense Depot Memphis Tennessee
DDRE	Defense Distribution Region East
DERP	Defense Environmental Restoration Program
DID	Data Item Description
DLA	Defense Logistics Agency
DM	Adamsite or Diphenylaminochloroarsine
DoD	Department of Defense
DOT	Department of Transportation
DQO	Data Quality Objectives
EC/BC	Edgewood Chemical and Biological Center
EE/CA	Engineering Evaluation/Cost Analysis
EMR	Electromagnetic Radiation
EOD	Explosive Ordnance Disposal
EPA	Environmental Protection Agency
ERDEC	Edgewood Research, Development and Engineering Center

FAA	Federal Aviation Administration
FAR	Federal Acquisition Regulation
FID	Flame Ionization Detector
FPD	Flame Photometric Detector
GFE	Government Furnished Equipment
HD	Also called HS (sulfur mustard) —Bis—(2—chloroethyl) sulfide
HERO	Hazards of electromagnetic radiation to ordnance
HSP	Health and Safety Program
HTRW	Hazardous, Toxic, and Radiological Waste
IAW	In accordance with
ID	Identification
IDW	Investigative Derived Waste
IHF	Interim Holding Facility
IWM	Innovative Waste Management
kg	kilogram
LCS	Laboratory Control Standards
LDR	Land Disposal Restriction
LEL	Lower Explosive Limit
MCE	Maximum Credible Event
MEAP	Mobile Environmental Analytical Platform
MGLP	Memphis Gas, Light, and Power
MINICAMS	Miniature Chemical Agent Monitoring System
MRC	Multiple Round Container
MSDS	Material Safety Data Sheets
NAD	North American Datum
NAVORD	Naval Ordnance
NCP	National Contingency Plan
NEW	Net Explosive Weight
NIOSH	National Institute for Occupational Safety and Health
NOSE	No Significant Events
NOTAMS	Notice to Airmen
NOV	Notice of Violation
NPL	National Priority List
NTP	Notice to Proceed
OE	Ordnance and Explosives
OP	Ordnance Publication
Op-FTIR	Open path Fourier Transform Infrared
OSHA	Occupational Safety and Health Administration
OU	Operable Unit
PAM	Pamphlet
PARCC	Precision, Accuracy, Representativeness, Completeness, and Comparability
PAT	Proficiency Analytical Testing
PC	Personal Computer
PCI	Pollution Control Industries, Inc.
PDS	Personnel Decontamination Station
PELs	Permissible Exposure Limit

PEP	Program Equipment Plan
pH	Corrosivity
PID	Photo Ionization Detector
PM	Project Manager
PMNS	Program Manager Non-Stockpile
PPB	Parts per Billion
PPE	Personnel Protective Equipment
PPM	Parts per Million
PS	Chloropicrin or Trichloronitromethane
PSI	Pounds per Square Inch
PVC	Polyvinyl chloride
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
QCP	Quality Control Plan
RAB	Restoration Advisory Board
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
RFP	Request for Proposal
RI	Remedial Investigation
SBCCOM	Soldier Biological and Chemical Command
SOW	Statement of Work
SSHO	Site Safety and Health Officer
SSHP	Site Safety and Health Plan
SSS	Site Safety Submission
SUXOS	Senior UXO Supervisor
SWMU	Solid Waste Management Unit
TAL	Target Analytes List
TCL	Target Compounds List
TCLP	Toxicity Characteristic Leaching Procedure
TDEC	Tennessee Department of Environment and Conservation
TDG	Thiodiglycol
TEU	Technical Escort Unit
TNT	Trinitrotoluene
TSDF	Treatment, Storage, or Disposal Facility
TWA	Time-Weighted Average
USACE	U.S. Army Corp of Engineers
USACHPPM	U.S. Army Center for Health Promotion and Preventative Medicine
USAESCH	U.S. Army Engineering and Support Center, Huntsville
UXB	UXB International, Inc.
UXO	Unexploded Ordnance
VCS	Vapor Containment Structure
WBG	Wet Bulb Globe Temperature
WWII	World War II
XSD	Halogen Specific Detector

1 INTRODUCTION

1.1 Reasons for the Chemical Warfare Materiel Investigation/Removal Action

The Defense Depot Memphis Tennessee (DDMT) is located within the city limits of Memphis, Tennessee (Figure 1). It is on the south side of the town on Airways Boulevard; it is located two miles northwest of the Memphis International Airport. The Depot is still actively managed by the Department of Defense, operated by the Defense Logistics Agency (DLA), and under the control of the Defense Distribution Region East (DDRE). The depot is undergoing Base Realignment and Closure (BRAC) activities, and the removal of potential hazards is required prior to the transfer of ownership. The DDMT consists of two distinct areas – the Main Depot area and the Dunn Field area.

1.1.1 Main Depot Area

There was no evidence of chemical warfare materiel (CWM) or unexploded ordnance (UXO) contamination within the main depot area.

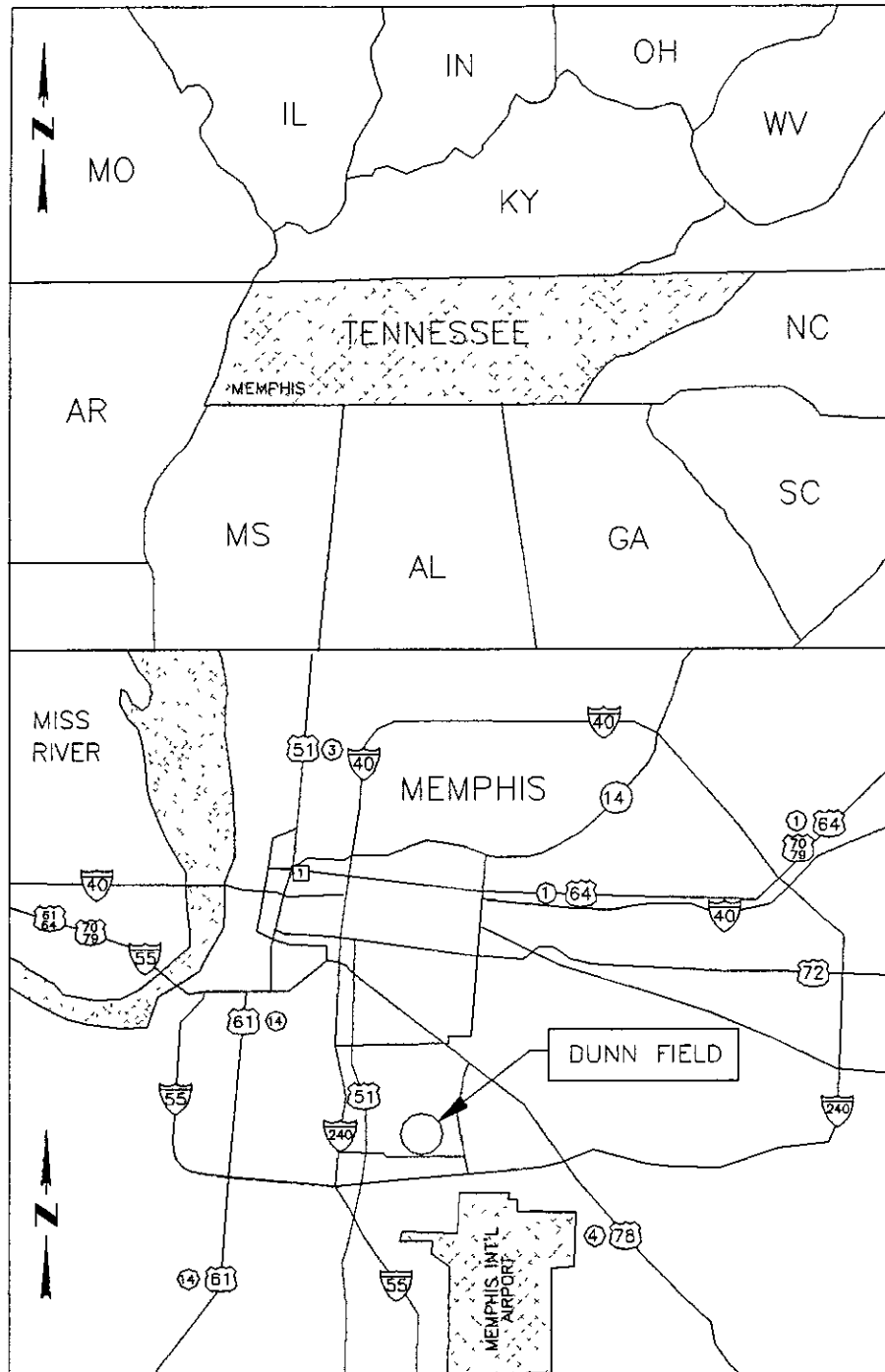
No portion of the Main Depot Area was included in this investigation. The management personnel authorized use of a conference room in Building 144 to conduct site-specific training and project related meetings. Moreover, project personnel were authorized to use the basement of Building 144 as a storm shelter, should the need arise.

1.1.2 Dunn Field Area

Archival records indicate that the Dunn Field Area was used to destroy or bury unserviceable military supplies. A small quantity of conventional ordnance was destroyed at Dunn Field. In 1946, the Dunn Field area was selected as the location to perform emergency neutralization of leaking German mustard bombs en-route to the Pine Bluff Arsenal in Pine Bluff, Arkansas. The emergency neutralization and decontamination occurred in Operable Unit 1 (OU-1). This area is also referred to as OU-1, unnumbered site, and is shown as Area A in the Memphis Defense Depot Archives Search Report (ASR), dated January 1995. The last reported disposal of CWM was the burial of chemical agent identification sets (CAIS) in 1955 or 1956, in OU-1, Site 1 (also shown in the ASR as Area B). Between 1946 and 1956, other chemicals associated with the Chemical Warfare Service were also buried. These included Impregnite (CC-2 and XXCC-3), used for impregnating clothing against chemical agent, and Decontamination Agent, Non-Corrosive (DANC) (consisting of RH195 and Acetylene Tetrachloride). In addition, food stocks (rations), acids (Nitric, Sulphuric, Hydrochloric, and Acetic), paints, herbicides, and medical waste were destroyed or buried in pits. Conventional ordnance war trophies (ordnance souvenirs brought back by returning World War II soldiers) were reportedly destroyed in the Dunn Field Area at the conclusion of World War II.

Dunn Field, also known as Operable Unit 1, encompasses an area of approximately 55 acres. In July 1946, a rail shipment of 250-kg and 500-kg sulfur-mustard-filled German bombs, en route from Mobile, Alabama to Pine Bluff, Arkansas, was diverted to DDMT when some of the bombs leaked and contaminated the rail line. The leaking bombs (twenty-five (25) 500-kg and four (4) 250-kg) were drained by shooting into the bomb casing, draining the mustard into a slurry pit (40-feet long by 8-feet wide by 12-feet deep), and destroying the empty bomb casings by detonation (the 500-kg bombs did not have explosives; some of 250-kg bombs may have contained an explosive burster).

Figure 1: Vicinity Map



Dunn Field, Operable Unit 1 (OU-1, ASR, Area B), Site #1, measures approximately 200-feet wide by 1,200-feet long, and consists of approximately 5 ½ acres. In 1952-1953, and again in 1955-1956, Chemical Agent Identification Sets (CAIS) were buried (type unknown). The ASR states that CAIS sets (in wooden boxes) were put into the pits intact and covered up. Although the exact kit type is unknown, typical CAIS included vials containing the agents listed in Table 1, but additional CAIS agents may also be present.

Table 1: CAIS Agents

Agent Abbreviation	Agent Name	Type of Agent
H or HD	Distilled Mustard (Sulphur)	Blister Agent
L or M-1	Lewisite	Blister Agent
PS	Chloropicrin or Tricloronitromethane	Choking Agent
CG	Phosgene	Choking Agent
CN	Chloroacetophenone or Chloromethyl phenyl ketone	Tear Agent
DM	Adamsite or Diphenylaminochloroarsine	Vomiting Agent

1.2 Investigation/Removal Areas

All investigation and removal actions took place within the Dunn Field area. Dunn Field is a 55-acre area north of the main installation. Dunn Avenue separates the Main Depot Area from the Dunn Field Area. The U.S. Army Engineering and Support Center, Huntsville (USAESCH) and Parsons Engineering Science, Inc. conducted an Engineering Evaluation/Cost Analysis (EE/CA) and identified three suspected CWM related burial sites in the Dunn Field Area. The sites were identified as:

- Site 1: a Chemical Agent Identification Set (CAIS) burial site.
- Site 24-A: a burial pit for the 29 drained bomb casings.
- Site 24-B: a neutralization/decontamination pit for mustard agent drained from the bomb casings. In some reference documents, this site is referred to as the "chlorate of lime" pit.

1.3 Statement of Work

Under Contract DACA87-97-D-0006, (Delivery Order 0012) the U.S. Army Engineering and Support Center, Huntsville (USAESCH) contracted UXB International, Inc. (UXB) to conduct a Chemical Warfare Materiel Investigation/Removal Action at Defense Depot, Memphis, Tennessee.

A complete copy of the final Statement of Work (SOW) is located in Appendix A. Table 2 describes the project's respective delivery order modifications.

654 13**Table 2: Delivery Order Modifications**

Modification No. (Effective Date)	Description
001201 (July 27, 2000)	Realigned existing contract funds, but did not change contract price. Revised schedule to reflect CLIN realignment changes
001202 (July 27, 2000)	Administrative Error.
001203 (August 23, 2000)	Corrected administrative error to modification number dated July 27, 2000, which reads modification 001201, which is corrected to read 001202. Realigned existing contract funds, but did not change contract price. Revised schedule to reflect the CLIN changes.
001204 (September 18, 2000)	Incorporated revised Statement of Work dated August 25, 2000 Contract price increased to \$2,989,988 48 Schedule revised to reflect the Item Number changes in price.
001205 (November 7, 2000)	Realigned existing contract funds, but did not change contract price Revised schedule to reflect respective changes.
001206 (January 31, 2001)	Added funds to continue ordnance and explosive (OE) work, as identified in the Statement of Work (dated August 25, 2000). Contract price increased to \$4,089,988.48. Revised schedule to reflect Item Number changes in price.
001207 (April 5, 2001)	Added funds to continue OE work, as identified in the Statement of Work (dated August 25, 2000). Contract price increased to \$4,895,783 48. Revised schedule to reflect Item Number changes in price

The work fell under the Base Realignment and Closure (BRAC) program. Chemical Warfare Materiel was suspected to exist on this property currently owned by the Department of the Army and managed by Memphis Depot Caretaker Division. Activities were performed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), National Priorities List (NPL), Environmental Protection Agency (EPA), State of Tennessee, and the National Contingency Plan. All work was conducted in compliance with the substantive requirements of all federal and state applicable, relevant, and appropriate requirements (ARAR). The provision of 29 CFR 1910.120 applied. No federal, state, or local permits were required for any action taken on-site.

1.4 Technical Instructions and Other Contract Direction

In addition to the contract modifications, USAESCH gave technical instructions and other contract directions, as listed in Table 3.

Table 3: Technical Instructions and Contract Directions

Date	Description
July 13, 1998	Request for Proposal (RFP) amended to incorporate cost proposal assumptions
October 25, 1998	Notice to Proceed on Tasks 1 and 2
March 8, 2000	Non-Intrusive Safety Submission approved; authorization to mobilize and perform non-intrusive site set-up
May 3, 2000	Inspection Team Authorizes operational readiness of personnel and procedures
August 18, 2000	Approval of personnel – K. Osborne
September 13, 2000	Geoprobe Sampling Proposal
October 18, 2000	Consent to subcontract UT Medical Group
January 17, 2001	Request for CLIN structured proposal for "Estimate to Complete"
January 30, 2001	Approval of personnel – J. Garcia and L. Aspegren
March 8, 2001	Approval of personnel – E. King, J. Garcia, and D. Becker

1.5 Previous Related Submittals and Citation of Government Authorization

During the course of this project, UXB submitted the following reports to USAESCH:

- Transportation and Disposal Plan for Waste Management
- Weekly reports to the Project Manager, USAESCH, and UXB management. Weekly reports contained the following information:
 - Project Description
 - Cost/Budget/Schedule Analysis
 - Issues Relating to Expenditures and Work Progress
 - Project Correspondence
 - Issues and Challenges
 - Project Information
 - Progress
 - Soil Sampling Record
 - Equipment/Contractor Services Information
 - On-Site Personnel
 - Vehicle Information
 - Exposure Data
 - Personnel Changes
- Geoprobe Sampling Proposal
- Geoprobe Hazard Analysis
- Hazard Analyses for Heating of PDS and Out of Tent Area, Forklift Operations, and Machinery and Mechanized Equipment
- CWM Soil Sampling Procedures (for TDEC)
- HTRW Soil Sampling Procedures (for TDEC)
- Changes 1-6 of the Site Safety Submission
- Cost Comparisons for Transporting Equipment

1.6 Project Objectives

The objective of this project was for UXB, in conjunction with the Chemical and Biological Defense Command (CBDCOM), to investigate and remove German Mustard Bombs, CAIS, CWM contaminated soil, and destroy any conventional UXO recovered by the investigation.

1.7 Technical Approach

The technical approach varied for each of the three investigation sites – Site 1, Site 24-A, and Site 24-B -- to accommodate site-specific targets, chemicals of concern suspected at each site, and environmental conditions. (Appendix B, Maps B-1, B-2, B-3, and B-4)

1.7.1 Site 1

Site-1 was a suspected burial site for CAIS vials. A soil sifter was employed to ensure capture of small glass vials that may otherwise have been missed using standard excavation techniques. Excavation of the site was performed to a depth of 10-feet.

1.7.2 Site 24-A

This was a burial pit for 29 German chemical warfare bomb casings. Geophysical surveys played a monumental role in determining the location of this site. Magnetometer and gradiometer instruments can readily identify large magnetic anomalies, such as bomb casings and these instruments were used to localize highly probable locations. Excavation locations were directed to locations known to contain high magnetic signatures.

1.7.3 Site 24-B

Site 24-B, referred to as the chlorate of lime pit in other reference materials, was the neutralization pit for mustard agent drained from the 29 German chemical warfare bombs. Geoprobe core sampling was employed to locate soil containing known mustard degradation by-products (1,4-thioxane, 1,4-dithiane, and thiodiglycol (TDG)) resulting from a mustard decontamination process. This proved most cost efficient and significantly reduced project costs. The third core sample was positive for mustard degradation by-products. Excavation began at this sampling location. Excavation continued until the pit boundary was excavated and sample reports proved the soil to be free of mustard agent and mustard degradation by-products.

1.7.4 Support Agencies

Edgewood Chemical and Biological Center and the U.S. Army Technical Escort Unit were significant support agencies on this project.

1.7.4.1 Edgewood Chemical and Biological Center (ECBC)

ECBC provided all CWM analytical support, including:

- Mobile Environmental Analytical Platform (MEAP) to perform CWM analysis of soil
- Open-path Fourier Transform Infrared (Op-FTIR) Spectrometer for downwind open air monitoring.
- Interim Holding Facility (IHF) for secure storage of recovered CWM.
- Air filtration system (four filter banks)
- Negative pressure and smoke test for each move of the VCS.

1.7.4.2 U.S. Army Technical Escort Unit (TEU)

TEU provided support in the following areas:

- Staffing to operate and maintain the personnel decontamination station (PDS)
- All personnel decontamination equipment and services
- PDS shower trailer
- Multiple Round Containers for recovered CWM rounds/live agent
- UXO qualified personnel to identify and take initial steps to eliminate CWM contamination
- Emergency Responder Personnel and Level A PPE
- Tyvek F (outer garments) and chemical protective under garments

1.8 Subcontractors and Vendors

UXB utilized the following subcontractors/vendors for non-UXO operations:

- A-1 Contractors – removed section of asphalt pad at Site 24-A
- ASI Ambulance, Inc -- provided on-site ambulance service
- Barnhart Crane & Rigging Company – provided overhead crane services
- CH2M Hill – provided confirmation sampling
- Chuck's Alterations - repaired air cylinder harnesses
- Clement Safety Equipment, Inc – supplied safety equipment
- Clement Safety Equipment, Inc. – provided mask fit test for North full-face mask and half-face respirators
- CNT's Transport – transported waste packaging drums to the site
- Enviroprobe Services, Inc. – conducted geoprobe sampling
- Ferguson-Harbour – remediated hazardous waste from an oil spill
- Fisher and Arnold, Inc. – conducted land surveys
- Gibson Propane, Inc. – supplied propane for heater and shower trailer
- Innovative Waste Management – provided waste management
- Kelly Electric Co. – preformed electrical hookup of site trailers and equipment
- Mahaffey Tent Company -- installed gutter on Mahaffey VCS
- Mahaffey Tent Company – rented, constructed, and dismantled VCS at Site 24-B
- Memphis Fire Department – provided mask fit test for Interspiro
- Memphis Light, Gas, and Water Division -- re-routed electrical grid during move of VCS
- nexAir, Inc - provided breathable air supply
- nexAir, Inc -- provided calibration Gas (for MEAP laboratory instruments and Environmental Monitoring Instruments)
- Pepper's Coin Laundry – provided laundry of chemical protective undergarments
- Ranstadt Staffing Services – provided temporary labor
- Southern Disposal – provided containers and disposal of solid waste (non-hazardous)
- Sprung Instant Structures, Inc. – provided VCS at Site 1 and Site 24-A
- Two Brothers – relocated heavy equipment to Ogden, Utah
- United Equipment, Inc. – conducted OSHA certified forklift training
- UT Medical Group – provided medical representation at Restoration Advisory Board (RAB) meetings
- Wells Fargo Security Services -- provided 24-hour security for Dunn Field

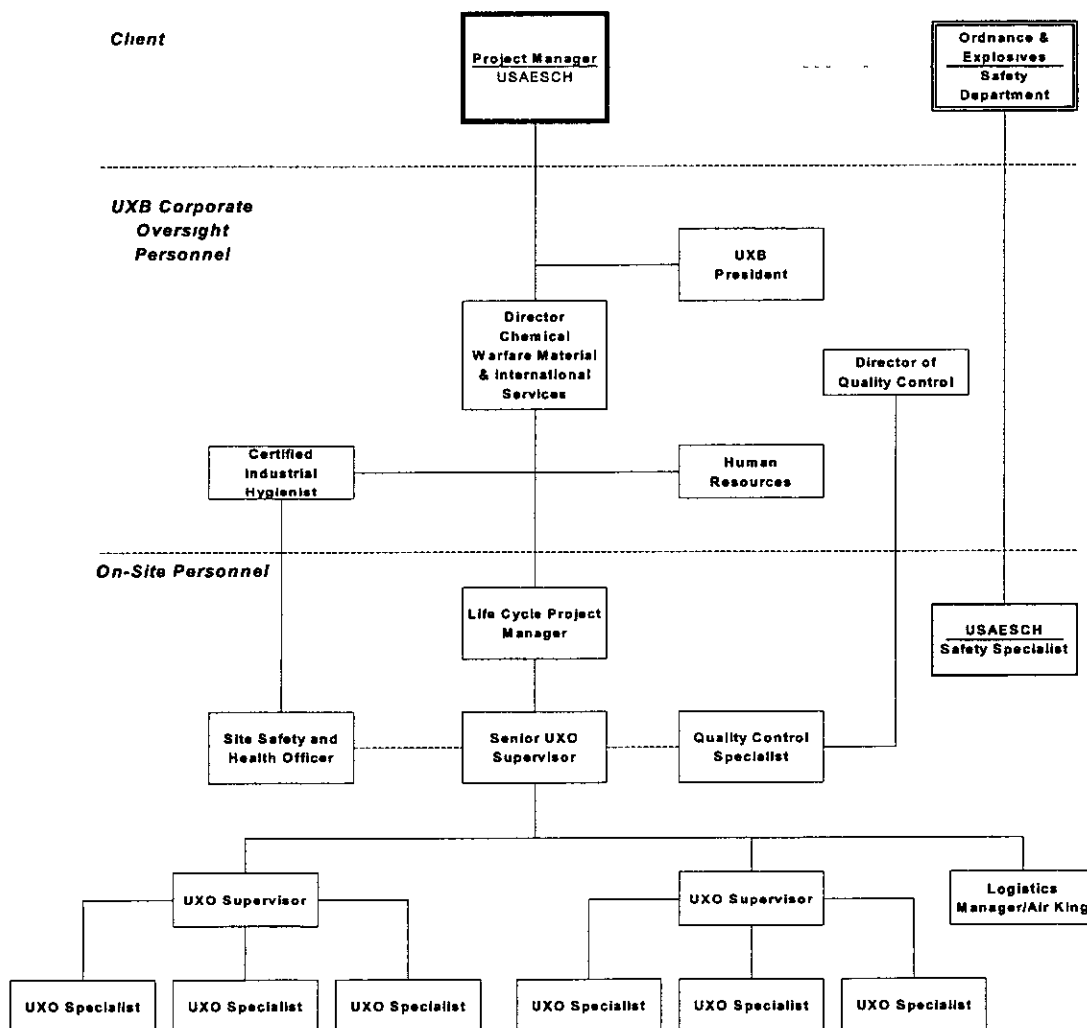
2 TECHNICAL DISCUSSION

This narrative details the technical effort and work performed on this project. Sections 2.1 through 2.7 describe activities and procedures that were generic to all three sites (Site 1, Site 24-A, and Site 24-B). Section 2.8 discusses the technical aspects and results specific to each site.

2.1 Organizational Structure

On-site conditions warranted a slight revision to the organizational structure outlined in the USAESCH-approved work plan. Figure 2 graphically illustrates the revised structure.

Figure 2: Organizational Structure



Note This chart does not include the vital support provided by Edgewood Chemical and Biological Center (ECBC) or U S Army Technical Escort Unit (TEU)

2.2 Project Preparation

Significant preparation was required prior to beginning activities at any of the sites. This section describes the preparation activities.

2.2.1 Site Safety Survey

Upon initial arrival, the Senior UXO Supervisor and the USAESCH Safety Specialist met with the Memphis Depot Environmental Manager to discuss the sequence of events, customer expectations, and establish site control. DLA was assured the measures taken to protect the workers and the surrounding community, as outlined in the approved Site Safety Submission (SSS), would be strictly enforced throughout the life of the project. All parties agreed to random site inspections by the customer or an authorized agency, as deemed necessary. UXB was given complete access control of Dunn Field Area through the entire project.

The USAESCH Safety Specialist and the Senior UXO Supervisor inspected Dunn Field for potential hazards and discovered a number of concerns that needed to be addressed prior to commencing fieldwork. The following concerns were identified:

- **Concern:** The terrain contained a number of holes left by power line poles and surface depressions resulting from burial pits – the holes and surface recesses presented a safety hazard to personnel. **Remedy:** These areas were marked with caution tape and where possible, backfilled to eliminate the hazard. **Result:** No accidents.
- **Concern:** An active railroad line was located immediately adjacent to the northern boundary, and within 20-yards of the Site 1 work area. **Remedy:** An early warning system was implemented to alert personnel in the event of a rail car leak, spill, or derailment. **Result:** No rail car incident occurred during project operations.
- **Concern:** Dunn Field is located under the flight path of the Memphis International Airport. **Remedy:** If required, UXB was prepared to post a Notice to Airmen (NOTAM) and develop procedures to closely coordinate on-site disposal of UXO with the Federal Aviation Administration (FAA). **Result:** No on-site detonation was required.
- **Concern:** Two main overhead power grids passed through the Dunn Field Area, and they would pose a significant safety challenge when using the overhead crane to move the vapor containment structure (VCS) from Site 1 to Site 24-A. **Remedy:** Contact Memphis Gas, Light, and Power (MGLP) Company. **Result:** With assistance from the MGLP, electrical power (through each power line) was re-routed prior to the VCS's transit through the area.
- **Concern:** Electromagnetic Radiation (EMR) emissions (from high voltage power lines) presented a significant hazard to electrical initiators. **Remedy:** Hazards of electromagnetic radiation to ordnance (HERO) safe blasting caps would be required for on-site disposal of recovered UXO. **Result:** The use of explosives or explosive materials was never required.
- **Concern:** A number of stray dogs roamed the area. **Remedy:** Personnel were cautioned to stay away from the dogs. **Result:** There were no negative incidents associated with the dogs; nor did they exhibit any aggression. A peaceful and respectful co-existence was maintained.

2.2.2 Vapor Containment Structure – Sites 1 and 24-A

Construction of the VCS began on March 13, 2000. Timely construction was imperative, as a Media Day was scheduled for March 21, 2000. A construction technician estimated construction time to be three days (30 hours). In reality, six days (74 hours) were required. There were no weather delays. Additional construction time is attributed to receipt of incorrect size of a fabric panel and three oversized spreader beams. The construction technician readily overcame these minor construction obstacles and the construction deadline was met.

The Senior UXO Supervisor (SUXOS) and the USAESCH Safety Specialist were on-site to ensure Occupational Safety and Health Administration (OSHA) and Corps of Engineers (COE) safety practices were enforced and to oversee the construction.

2.2.3 Media Day

The Memphis Depot BRAC Clean-up Team (BCT) conducted the Media Day on March 21, 2000. Presentations (describing the project) were conducted in a temporary tent constructed near Site 1. Graphic displays (showing equipment and safety measures to protect the public) were explained in detail to concerned citizens and the news media.

2.2.4 Site Security

Well Fargo Security provided 24-hour security throughout the project. The SUXOS regularly updated access rosters with the names of those authorized to enter the site. All personnel signed in to record their time of arrival, and they signed out to record their time of departure.

Site supervisory personnel approved personnel who were not on the list, but who required access. These personnel were required to proceed to the administrative office and receive a safety briefing. Following the safety briefing they signed a safety briefing acknowledgement form. Their entry and exit times were recorded. The USAESCH Safety Specialist received a copy of the completed access form at the conclusion of each workday.

Security personnel were also provided specific written instructions on security checks and a point of contact list (with names and telephone numbers of key personnel).

There was one incident of theft regarding a missing briefcase and small television belonging to the Memphis COE representative. The items were taken from the on-site COE office. The security contractor replaced the missing items.

2.2.5 Underground Utilities Inspection

The Memphis Depot BRAC Coordinator office was consulted on the presence of underground utilities within the investigation areas. They confirmed that all search areas were free of underground utilities.

2.2.6 Site-Specific Training

Personnel participating in on-site work attended site-specific training to become acquainted with the mission, objectives, methods, and techniques to achieve the objectives of the project; to communicate hazards (including chemicals and environmental concerns); and to clearly delineate required personnel safety standards.

At the start of the project, a certified mask fit inspector from ECBC conducted mask fit tests for all personnel required to wear a mask. For personnel added to the project after initial mobilization, the Memphis Fire Department conducted fit tests for the Interspiro mask, and Clement Safety conducted fit tests for the North full-face mask and half-mask respirator.

UXB's Corporate Safety Manager presented training on the operation of environmental monitoring instruments, including: four-gas monitor, wet bulb globe temperature (WBGT); Flame Ionization Detector (FID); and the Photo Ionization Detector (PID). He also provided training in cardiopulmonary resuscitation (CPR) and First Aid.

Personnel received medical authorization to work in a CWM operation, and they received a slit-lamp exam for working in a potential mustard-contaminated environment. Slit-Lamp exams were conducted in accordance with DA PAM 40-173

Personnel received hands-on training on the use of excavation and shaker table operation. This training was conducted without the need to perform soil intrusive work. Trainees operated the equipment using known clean soil that had been placed on plastic sheeting.

United Equipment, Inc. trained heavy equipment operators on all on-site heavy equipment. The training included an in-depth curriculum, and students received an OSHA certification to operate a forklift.

Two tabletop exercises were held to ensure all parties clearly understood their roles, proper use of personal protective equipment (PPE), and the methodologies and procedures to safely and effectively accomplish mission objectives.

Full-dress rehearsal training was conducted prior to the pre-operational inspection. No intrusive work was performed during any training exercise Soil was placed inside the VCS, and known clean soil was placed into the sifter to train personnel on visual observation of segregate soil. Command and control was conducted from the Command Post, to simulate real-time operations. All personnel wore the required modified-B PPE with line-supplied air. Technical Escort Unit (TEU) personnel simulated packaging CWM in multiple round containers (MRC). Personnel were required to process through the PDS repeatedly until the process became second nature. The Senior UXO Supervisor and the USAESCH Safety Specialist monitored all phases.

Morning safety briefings were conducted at the start of each workday. Safety topics varied from day-to-day, but always addressed safety infractions noted by the USAESCH Safety Specialist or the Site Safety and Health Officer.

Upon arrival, site visitors received a safety briefing from the Site Safety and Health Officer.

2.2.7 Maximum Credible Event (MCE)/Emergency Evacuation

The MCE was determined during the initial planning stages of the project. The MCE for excavation activities was based on the known or suspected CWM/UXO items reportedly buried at the specific excavation sites. Because the contents of Site 1 differed from Sites 24-A and 24-B, individual MCEs were assigned to each area of excavation:

- Site 1: MCE was one (1-inch x 9-inches) vial (40 ml) of phosgene, based on 951 and 952 type CAIS (instantaneous release)
- Sites 24-A and 24-B: MCE was 5 gallons of Mustard (evaporative release)

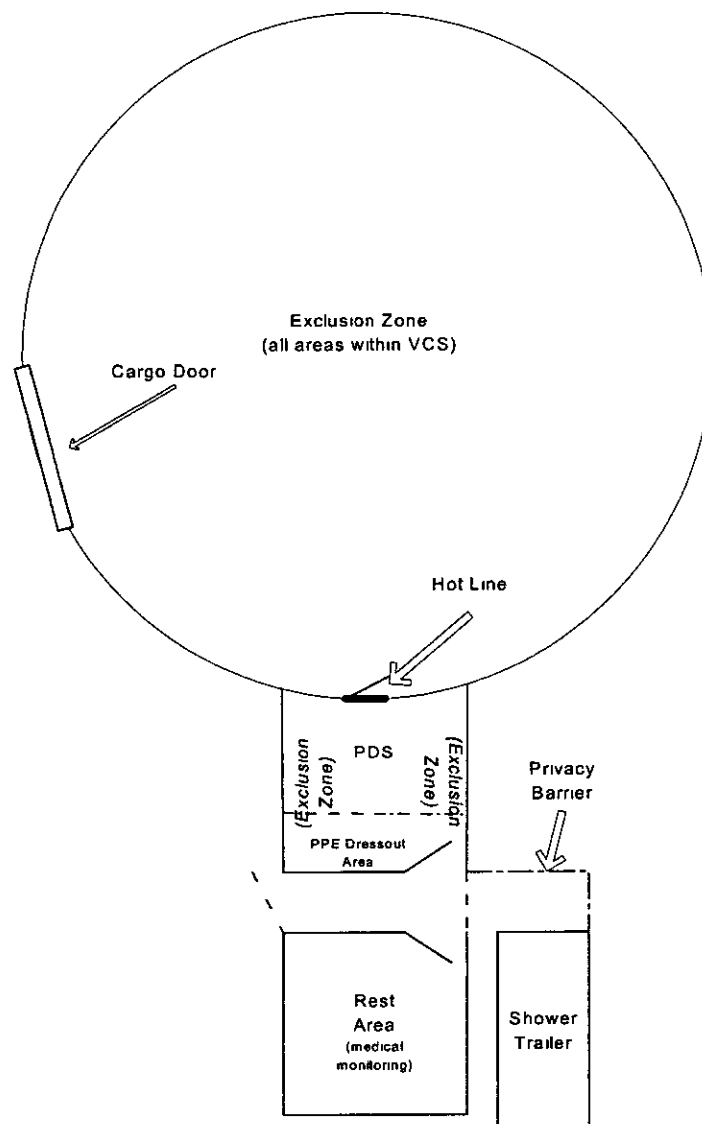
2.2.8 Hotline and Exclusion Zone

The hotline and exclusion zone configurations are graphically illustrated in Figure 3.

The hotline was established at the VCS crew entrance doorway. TEU erected a temporary tent at the exit of the hotline (VCS crew door) to house the personnel decontamination station (PDS). All required monitoring instruments and decontamination stations were located inside the PDS tent. A containment sump, consisting of thick rubber flooring and sidewalls, ensured all

decontamination fluids and rinse water were captured for testing and proper disposal. The TEU shower trailer was positioned at the end of the PDS. Two additional tents served as a dress-out area and cool-down/warm-up area. The TEU shower trailer was positioned within the PDS area and remained operational. Air tanks were placed adjacent to the cool-down/warm-up tent. Air gauges were positioned to allow the Air King (manager of line air supplies) full view of all cylinder air pressures at all times.

Figure 3: Exclusion Zones and Hotline



2.2.9 Vapor Containment Structure Compliance Testing

The project required total assurance that no release of toxic vapors would reach the open air. To provide this assurance, a stretched membrane enclosure was evaluated and selected. A Sprung VCS was used over Sites 1 and 24-A; and a Mahaffey VCS was used at Site 24-B. The VCS structures were uniquely designed to enclose all spaces exposed to the open air. A negative air pressure was constantly maintained by an air filtration system – 24-hours per day.

Filter shutdown periods were only authorized after the site was certified free of airborne contaminants and USAESCH Project Manager approved the site for closure.

A certified ECBC testing team provided an initial negative pressure and smoke test on the VCS; they repeated the test if the structure was moved or repositioned. Intrusive work was not permitted until ECBC certified the structure operationally ready and capable of maintaining a negative pressure and of eliminating an inducted smoke cloud from within the structure.

2.2.10 CWM Monitoring Systems

Area monitoring systems were established to notify workers and the general public of the first sign of a CWM release. These systems included a Miniature Chemical Agent Monitoring System (MINICAMS) monitoring and an Open path Fourier Transform Infrared (Op-FTIR) open air monitoring. The highly reliable Depot Area Air Monitoring System (DAAMS) were in place to confirm any positive indications received from the MINICAMS. The below listed monitoring systems were in place and operational at each investigation site.

2.2.10.1 CWM Early Warning System (MINICAMS)

MINICAMS is an automatic air monitoring system that collects compounds on a solid sorbent trap, thermally desorbs them into a capillary gas chromatograph column for separation, detects mustard-related compounds with a Flame Photometric Detector (FPD) or Halogen Specific Detector (XSD). It is lightweight, portable, low-level monitor designed to respond in less than ten minutes with alarm capability.

MINICAMS sensors were placed at each of the four filter intakes, and one "hotline sensor tube" was placed inside the VCS for point source monitoring. This system provided near real-time alert of a toxic release.

There was no airborne release indicated on the MINICAMS. The false ring-offs were analyzed, and indicated a realignment of the gate setting.

2.2.10.2 Open-Air Monitoring

An Open-path Fourier Transform Infrared (Op-FTIR) Spectrometer transmitted an interrogation infrared beam downwind of operations to identify and quantify gases in the open air. The Op-FTIR continuously monitored downwind areas during field operations. Wind directions were constantly monitored to ensure the Op-FTIR was correctly positioned.

This system served as a failsafe measure to alert the general public in the event of an open-air release of toxic gases. There was no indication of an open-air release of toxic gases through the life of the project.

2.2.10.3 Airborne Confirmation Sampling

Depot Area Air Monitoring Systems (DAAMS) were placed inside the VCS and immediately downwind of the work area. Should a CWM airborne release have occurred, DAAMS would have provided positive confirmation of the hazard and appropriate protective measures would have been taken to protect the public. There was no confirmed or suspected indication of an airborne CWM release throughout the project.

2.2.11 Environmental Monitoring Systems

Monitoring equipment was maintained inside the VCS to check for: oxygen levels; lethal explosive limits; presence of volatile organic compounds, hydrogen sulfide (H_2S); nuisance dust; carbon monoxide (CO); and noise. The following action levels were maintained:

- LEL - 10% - Evacuate
- O_2 - $<19.5\%$ O_2 - Evacuate* (not applicable in Level A or B)
- Nuisance Dust* - 2.5 mg/m^3 : Implement Dust Suppression Techniques, as required
 - 5 mg/m^3 Mandatory use of LEVEL C with half or full-face APR or higher
 - Level C w/ half-facemask required for Site 24-A and 24B. NOTE: All intrusive work was performed in EPA Modified LEVEL B w/line-supplied air. Refer to paragraph 2.8.4.2
- Noise - Decibels in excess of 85dB require earplugs with 20 dB attenuation; 105dB requires additional ear muff sound attenuators.
- H_2S * - Hydrogen Sulfide $\geq 2.5 \text{ ppm}$ – Evacuate (not applicable in Level A or B)
- CO* - Carbon Monoxide $\geq 25 \text{ ppm}$ – Evacuate (not applicable in Level A or B)
- FID - Combustible Organic Gases and Vapors 5 ppm for five minutes – Evacuate (not applicable in Level A or B)
- WBGT - Wet Bulb Globe Temperature = $.7WP + .2G + .1D$

Where WP = wet bulb temp; G = Globe temp; and D = Dry temp.

2.2.12 Personal Protective Equipment

Protection of workers was a primary focus throughout the project and enormous efforts were taken to include measures that exceeded minimum OSHA requirements. During excavation work, workers were required to wear modified-Level B with line-supplied air. The modified-Level B ensemble included:

- Tyvek F/with hood
- inner/outer gloves
- inner boots
- booties
- chemical protective undergarments (CPU)
- full-face mask with line-supplied air
- escape bottle
- optional cooling vest during heat stress conditions

On February 6 and 7, 2001, a team comprised of representatives from DA Safety; Soldier Biological and Chemical Command (SBCCOM); USATECS; and the U.S. Army Corps of Engineers (USACE) met in Aberdeen Proving Ground, Maryland. This team authorized use of modified-Level B PPE for working in CWM environments with air concentrations up to 10 times greater than the time-weighted average (TWA). The modified Level B ensemble required the wearing of Tyvek F outer garment, chemical protective undergarments (CPUs), inner/outer gloves, inner boots, booties, taped closures (at wrist and ankles), and full facemask with line-supplied air.

Workers were permitted to work in modified-Level D while performing non-intrusive bin change out at Site 1 and perform non-intrusive bomb casing investigation at Site 24-A with CWM monitoring showing no agent present. Modified-Level D included:

- coveralls
- gloves
- safety toed work boots
- eye and ear protection (when required).

Geoprobe sampling operations were conducted in Modified-Level C. Modified-Level C included:

- Tyvek F coveralls
- full face mask with organic vapor cartridges
- CPUs
- outer and inner gloves
- steel-toed boots
- outer boots

2.2.13 Line Supplied Breathing Air

Line supplied breathing air is an integral part of modified-Level B PPE. Man-carried air cylinders were not practical, because of the limited air supply they contained and bottle change-out was too time consuming. The use of an air compressor and cascade air tanks (banks) were considered. Initially, the cost of purchasing breathable air to charge air banks was greater than the cost of using an on-site air compressor. ECBC provided an air compressor and a qualified person to charge air tanks/emergency escape bottles. During the first week of operation, an alternate source for breathable air was located. This alternate source rendered the cost of purchasing breathable air less than the cost of operating the charging unit and salary of the operator. The charging unit operator and the charging unit returned to ECBC headquarters in Edgewood, MD. Table 4 was compiled to determine the most cost-effective means of replenishing breathable air. It is provided in this report for consideration at other CWM sites.

Table 4: Air Consumption Table

Air Medium	CU FT.	Cost Per CU FT.	Consumption Per Hr. in Cu. Ft.	CU FT. Used Per 50 Hour Week	Cost Per Week	Remarks
Cascade System Air #2	2796	.0403	93.20 CU FT	4,660	\$187.80	Each skid contains 12 cylinders each. Two skids are required each six days of work. Current use for four people is 400 PSI per hour
Equip. Air Air #3	568	.0407	37.87	1,893.5	\$77.07	Four Cylinders Per week
Bottles, Man-carried	60 Min.	8.50 per cylinder	6 cylinders per day	30 Cylinders per week	\$255.00	Use of new provider reduced bottle-charging costs by 2/3

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Air Medium	CU. FT.	Cost Per CU. FT.	Consumption Per Hr. in Cu. Ft.	CU. FT. Used Per 50 Hour Week	Cost Per Week	Remarks
Air Skid Charge	N/A	N/A	N/A	N/A	\$60.00	Two skids per week
Hazardous Material Charge	N/A	N/A	N/A	N/A	\$6.00	\$3 00 charge per skid
Breathable air costs per 50-hour week					\$585.87	
Labor					\$1,500	Estimated for 50 hrs @ \$30 loaded rate
Cost estimates may increase by 10% during days when temperatures are above 90° Fahrenheit. This estimate is based on documented consumption rates at Dunn Field in temperatures less than 85° Fahrenheit. Other specifications include. four personnel on line supplied air and two personnel supplied with #2 air cylinders affixed to excavation equipment						

2.3 Pre-Operational Inspection

A Department of Army (DA) Inspection Team conducted a Pre-Operational Inspection from April 17-21, 2000. Inspection team members included representatives from DA Safety, Tennessee Valley Authority, U. S. Army Corps of Engineers, Defense Logistics Agency, Technical Escort Unit, and Edgewood Chemical and Biological Center.

The purpose of the inspection was to test all operational and administrative aspects of the project in accordance with the approved Site Safety Submission. The inspection included a review of medical and training certificates; a tabletop exercise; and a practical test in full-dress.

The majority of the noted deficiencies were corrected during the pre-operations inspection; however, there was a concern that some corrections warranted a re-inspection prior to authorizing commencement of intrusive work at the site.

Two USAESCH personnel provided additional training regarding CWM operations. This initiative expedited correction of inspection deficiencies. Operational drills were conducted daily for a one-week time period.

The Inspection Team returned on May 2, 2000; they reviewed inspection discrepancies and accepted all administrative and corrective actions. The Inspection Team set up various scenarios to verify understanding and test for appropriate responses to simulated operational and emergency situations. A non-intrusive exercise was conducted in full-dress PPE and equipment. On May 3, 2000, the Inspection Team's debrief concluded that project personnel were operationally ready for intrusive work in a chemical warfare environment. A formal written authorization was received from the Inspection Team, and investigation and removal operations began on May 4, 2000.

2.4 Sampling Procedures

This section describes the sampling procedures that were implemented at all three sites.

2.4.1 Soil/Aqueous Sampling Procedures

The ECBC Mobile Environmental Analytical Platform (MEAP) performed all CWM analysis. This on-site laboratory was a self-contained laboratory capable of providing all laboratory functions necessary to analyze soil, water, and debris samples for CWM chemicals.

ECBC laboratory personnel analyzed samples from investigative derived wastewater, soil, and debris for CWM.

Soil and water contaminated with CWM were packaged, manifested, labeled, and shipped for disposal in accordance with the Transportation and Disposal Plan (T & D Plan).

Soil and water samples proven free of CWM contamination were shipped to an independent laboratory for HTRW compliance sampling.

Sample analysis revealed all debris to be free from CWM. Debris removed from pits known to have been exposed to CWM and surface decontaminated were treated as contaminated material.

2.4.1.1 Soil and Aqueous Sampling for CWM

The determination if waste was contaminated with CWM remained a critical task requiring indisputable record keeping and linking of staged soil/water to their respective composite samples. The ECBC laboratory technicians performed all CWM analysis on-site. No HTRW sampling was permitted for soil containing CWM. CWM-contaminated waste was containerized per DOT shipment regulations and shipped off-site for treatment. The following paragraphs describe the processes used to sample waste streams for CWM.

2.4.1.1.1 Soil Samples

The intent of CWM sampling and analysis was to properly profile the waste characteristics of the excavated soil and aqueous solutions to ensure appropriate disposition of soil/debris/water. Testing analysis indicated low-level CWM contamination areas. Analytical results ensured that soils and aqueous samples could be safely shipped to off-site laboratories for further Hazardous, Toxic, and Radiological Waste (HTRW) analyses. All soil samples were analyzed for the presence of the site-specific CWM of concern. If the soil analysis detected the presence of CWM, no further testing was performed, as this soil was classified as CWM contaminated soil. Soils that did not contain CWM were further tested for 1,4-dithiane, and 1,4-thioxane (1,4-oxathiane). Soil found to contain 1,4-dithiane or 1,4-thioxane were tested for Thiodyglycol (TDG).

UXB determined the soil-sampling locations and collected soil samples according to the procedures established in the USAESCH-approved work plan. UXB double bagged the samples, prepared a Chain of Custody form, assigned a unique identification number for each sample, and passed custody of the samples to the ECBC site representative. The double-bagged soil samples were analyzed by the MINICAMS, in accordance with Soil Headspace Procedures defined in the Site Safety Submission, ECBC Air Monitoring Plan, (Section 3.3.4). Once cleared, samples were transported to the on-site Mobile Environmental Analytical Platform (MEAP) for soil extraction testing. Soil extraction tests permitted quantification of COC in PPB.

2.4.1.1.2 Aqueous Samples

UXB collected aqueous samples from all investigative derived waste (IDW) water. IDW water is generated through decontamination processes, rainwater that may migrate into the excavation

pit, and from washing vehicles used inside the vapor containment structure (VCS). Aqueous samples were extracted in a similar matter to the procedure for soils. Samples were injected into a Hewlett-Packard Gas Chromatograph/Mass Spectrometer for analysis. If the initial analysis detected the presence of CWM, no further testing was performed. If CWM was not present, the extract was tested for 1,4-dithiane, or 1,4-thioxane. The presence of either of these compounds required a subsequent extraction of the sample for TDG. If the initial analysis did not detect the presence of 1,4-dithiane or 1,4-thioxane, then the TDG extraction was not conducted.

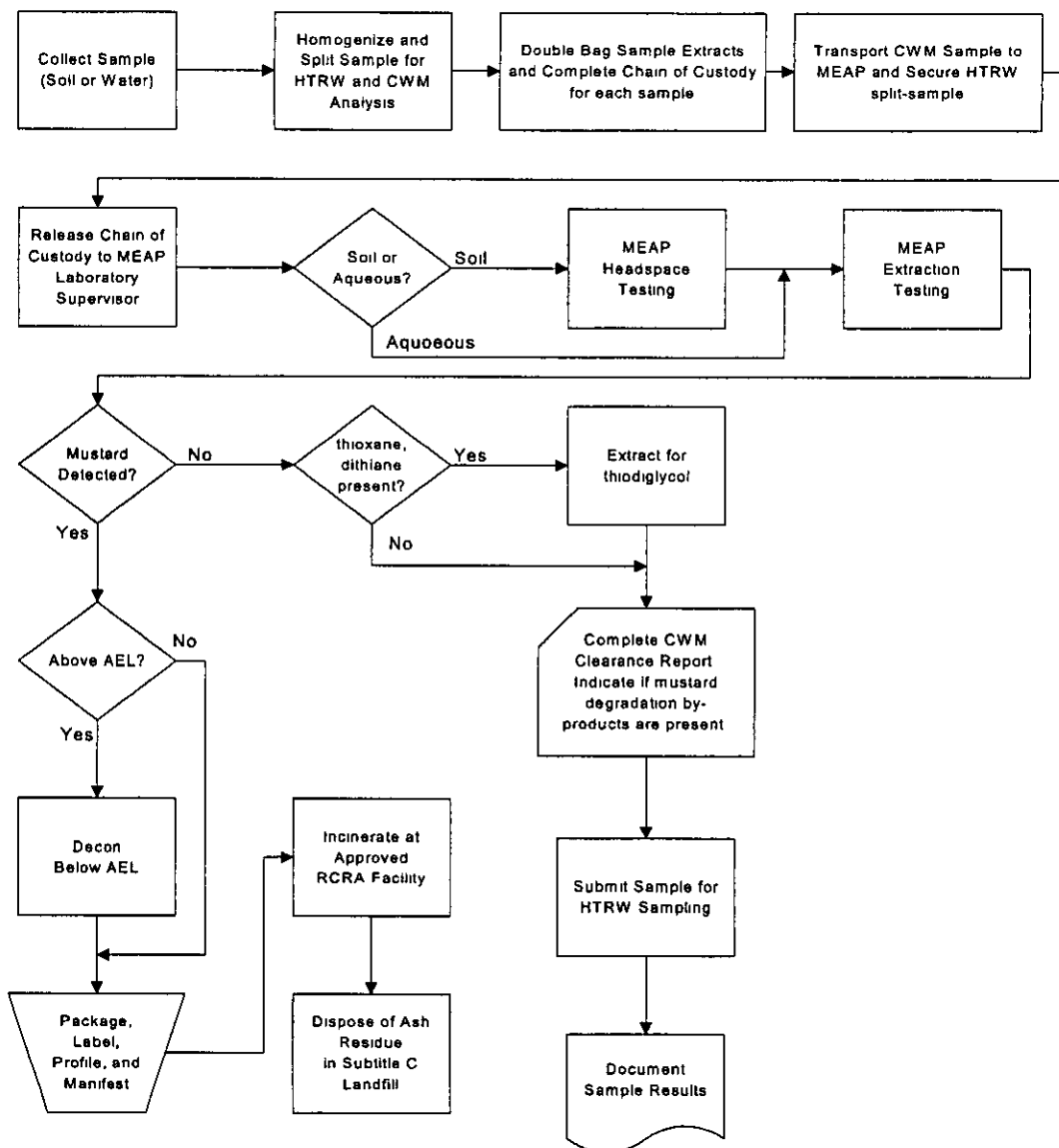
2.4.1.1.3 Sampling Process

Refer to Figure 4 for flow-process used for CWM/HTRW Sampling.

2.4.1.2 Soil and Aqueous Sampling for HTRW

Prior to submitting soil and aqueous samples for HTRW analysis, ECBC Laboratory collected and tested samples for the presence of CWA. Samples were collected from each 1.5 cubic yards of soil excavated and from each 55-gallon drum of wastewater collected. This initiative ensured that CWA contaminated soil or water was not sent to offsite laboratories for analysis. Only soil/water proven free of CWA, through analysis, were allowed offsite for follow on HTRW analysis. Once determined free of CWA, HTRW samples were collected from each 20 cubic yards of soil excavated and from each 500 gallons of waste water collected. Independent laboratories (Severn-Trent and ETC) tested soil for reactivity, corrosivity, ignitability on un-extracted waste samples, and an arsenic count was performed using the Toxicity Characteristic Leaching Procedure (TCLP). Water samples were analyzed for Target Compounds List (TCL) volatiles, TCL semi-volatiles & pyridine, TCL pesticides, TCL PCBs, herbicides (2 compounds), Target Analytes List (TAL) metals, cyanide, sulfide, pH, and flashpoint.

Figure 4: Sampling and Analysis Process Flow Diagram



2.4.1.2.1 HTRW Testing Protocols

Refer to Table 5, which shows the testing constituents and the laboratory methods to detect the constituents.

Table 5: HTRW Testing Protocols

IDW Water	
<i>Constituent</i>	<i>Analytical Method</i>
Cyanide	9012A
Flash Point	1010
Sulfide	371.1
pH – aqueous	9040
Mercury	7470A
Metals ICP- total	6010B
Metals ICP – trace total	6010B
Herbicides	8151A
TCL Pesticides	8082
TCL Pesticides	8081A
TCL BNA & Pyridine	8270C
TCL VOA	8260B
Solids	
<i>Constituent</i>	<i>Analytical Method</i>
TCL VOA	8260B
TCL BNA	8270C
TCL Pesticides	8081A
TCL PCBs	8082
TAL Metals ICP Trace	6010B
Mercury	7471A
Cyanide	9012A
TCLP	
<i>Constituent</i>	<i>Analytical Method</i>
TCLP Volatile	8260B
TCLP Semi-volatiles	8270C
TCLP Pesticides	8081A
TCLP Herbicides	8151A
TCLP ICP Metals	6010B
TCLP Mercury	7470A
Arsenic	6010A

2.5 Waste Management Procedures

Managing generated waste was a significant challenge, and required regular consultation from a certified waste management contractor. Tremendous efforts were taken to ensure absolute compliance with RCRA and CERCLA regulations on waste disposal policies, and to ensure appropriate disposition of CWM was effected (as directed by Toxic Chemical Agent Safety Standards, DA-PAM 385-61). Specific disposal/treatment guidelines were not identified in the Site Safety Submission (SSS). General regulatory guidelines provided by the SSS, did not identify a detailed disposition for each waste stream encountered at Dunn Field. Initially, soil containing mustard degradation by-products was sent to Pollution Control Industries (PCI) for

stabilization/fixation treatment and follow-on disposal in BFI RCRA Subtitle D landfill. Though this was within regulatory compliance, reported worker illnesses, reported around the same time Dunn Field soil arrived at the PCI facility, caused alarming concern and warranted a thorough review of waste disposal practices at Dunn Field. This incident is discussed in detail in paragraph 2.8.4.1. As a result of this incident, the Tennessee Department of Environment and Conservation (TDEC) required the submission of a Transportation and Disposal Plan (T & D Plan). This plan was submitted to identify all facets of waste management processes. USAESCH, BRAC Cleanup Team (BCT), UXB, and TDEC approved this plan. Final approval to implement the plan was received from TDEC

2.5.1 Contaminant Categories and Treatment/Disposition

A review of the site waste profiles identified a number of possible waste categories. All waste was physically segregated and classified in nine categories, as follows:

1. Soil Within 40 CFR Guidelines, But Containing Foreign Debris
2. HTRW Contaminated Soil
3. Mustard Degradation By-Product Contaminated Soil
4. Mustard Contaminated Soil
5. 3X Material
6. Investigative Derived Waste Water
7. Mustard Degradation By-Product Contaminated Water
8. Mustard Contaminated Water
9. Ordnance and Explosives (OE)

2.5.1.1 Soil Within 40 CFR Guidelines, But Containing Foreign Debris

This soil was within TCLP standards (as defined in 40 CFR Part 261), contained foreign debris, but did not contain mustard or mustard degradation by-products. Foreign debris consisted of broken glass, wood, construction debris, and metal fragments.

Disposition. Soil that passed TCLP analysis was removed from the site and placed in a Subtitle D (non-hazardous waste) landfill owned by Waste Management in Tunica, MS. Soil that failed to meet HTRW criteria (as defined in 40 CFR Part 261) was placed in a Subtitle C Landfill (hazardous waste) operated by Waste Management in Emelle, AL. After necessary treatment, by the Emelle facility, to meet land disposal restriction (LDR) treatment standard in 40 CFR Part 268, the soil was manifested (per 40 CFR Part 262), and LDR notice requirements of Part 268 were followed.

2.5.1.2 HTRW Contaminated Soil

This soil contained HTRW constituents at or above regulatory compliance levels (per 40 CFR 261), but did not contain CWM or mustard degradation by-products.

Disposition After any necessary treatment (by the Emelle facility) to meet LDR treatment standards in 40 CFR Part 268, the soil was manifested (per 40 CFR Part 262), and LDR notice requirements of Part 268 were followed. Soil was then placed in a Subtitle C Landfill operated by Waste Management in Emelle, AL.

2.5.1.3 Mustard Degradation By-Product Contaminated Soil

This soil did not contain CWM, but did contain detectable levels of mustard degradation by-products. Mustard degradation by-products included 1,4-thioxane, 1,4-dithiane, and/or thiodiglycol (TDG). These constituents are not listed as a hazardous waste in Part 261.

Treatment and Disposition. Clean Harbors Environmental Services at Kimball, Nebraska, incinerated this soil. Residue ash was disposed of in a dedicated monofill landfill at the incineration facility.

2.5.1.4 Mustard Contaminated Soil

This soil contained a detectable amount of mustard.

Treatment and Disposition. Clean Harbors Environmental Services at Kimball, Nebraska, incinerated this soil. Residue ash was disposed in a dedicated monofill landfill at the incineration facility.

2.5.1.5 3X Material

3X Material (a.k.a. XXX) included items that had been surface decontaminated and tested, by approved methods, as free from CWM residue. The recovered 29 German chemical warfare bomb casings and metallic debris recovered from pits (known to have at one time contained mustard agent (Sites 24-A and 24-B)) were classified as 3X material.

Treatment and Disposition. Safety-Kleen, Inc. incinerated all 3X material in accordance with DA PAM 385-61. Ash residue was placed in a Subtitle C landfill located near Wayinoka, OK.

2.5.1.6 Investigative Derived Waste Water

The waste stream consisted of water collected as a result of decontamination of personnel and equipment, rain runoff recovered from excavation pits, and wash water collected from washing vehicles operating inside the VCS. This water was sampled for HTRW constituents (per 40 CFR Part 261) and for CWM using ECBC testing protocols. This water did not contain CWM or mustard degradation by-products.

Treatment and Disposition. The following paragraphs describe treatment and disposition of non-contaminated and contaminated water.

- Non-Contaminated Water. Chemical analysis of the water determined if it was within the limits specified in 40 CFR Part 261. ECBC confirmed this water as totally free of CWM and mustard degradation by-products. Letters, with attached TCLP sample analysis and ECBC's CWM clearance report, were submitted to the City of Memphis Public Works Department (Mr. Akil Al-Chokahachi – [901-353-2392]). One letter was sent for each 500 gallons of water in the category, and the letter addressed the source of the water, quantity, and requested authorization to discharge this specific water into the Memphis Public Sewer system at a discharge location at specified discharge flow rate. The Memphis Public Works Department approved each letter submitted. Letters of request and approvals are located in Appendix C.
- Contaminated Water. Water containing unacceptable levels of HTRW was treated and disposed of in a Subtitle C landfill operated by Waste Management, Inc. in Emelle, AL.

2.5.1.7 Mustard Degradation By-Product Contaminated Water

This water contained detectable levels of mustard degradation by-products.

Treatment and Disposition. Clean Harbors Environmental Services of Kimball, Nebraska, incinerated this water. Residue solids were disposed of in a dedicated monofill landfill at the incineration facility.

2.5.1.8 Mustard Contaminated Water

Mustard contaminated water contained any detectable level of mustard agent.

Treatment and Disposition. This water was incinerated using a furnace injection process at Clean Harbors Environmental Services in Kimball, Nebraska; the small quantities of residue (solids) were disposed of in a dedicated monofill landfill at the incineration facility.

2.5.1.9 Ordnance and Explosives

Two un-fuzed burster tubes could not be inspected to the degree necessary to confirm them free of explosive material. . Inspection requires a thorough examination of each component for explosive material and/or residue. These burster tubes were intact. Gaining access to the explosive component sections would have required subjecting the bursters to unacceptable levels of heat, shock, and friction. Since the inspector could not be certain the bursters were "free from explosives," they were assumed to be live. Refer to paragraph 2.8.2.8 for details.

Treatment and Disposition. Open detonation was not permitted at Dunn Field or on any property owned or operated by the Memphis Depot Caretaker Division. The two suspected live burster tubes were transported off-site for disposal through incineration by Safety-Kleen (Colfax), Inc. of Colfax, Louisiana. Safety-Kleen possesses a RCRA Part B, Subpart X permit that authorizes incineration of single explosive items of up to 20-pounds net explosive weight.

2.5.2 Disposition Paths For Waste Streams

Refer to Table 6 for the disposal paths for contaminated waste.

During closure of the project, approximately three (3) U.S. gallons of water containing rainwater and diesel fuel were tested and transported off-site for disposal. The water was the residue from maintenance of the steam washer. Diesel fuel leaked from the fuel tank of the steam washer into the steam cleaner water supply tank. The contaminated water was removed and placed into a metal holding container to await disposal. To assure no other contaminants were present in the water, two samples were collected and tested using TCLP testing. Sample analysis confirmed that only diesel fuel was present. Due to the low concentration, the waste was treated and shipped as non-regulated waste.

2.5.3 Waste Disposal Certification Certificate

Copies of waste disposal certifications are found in Appendix C.

2.5.4 Soil Characterization

All excavated soil was characterized for chemical content, and the results were compared with a set of criteria to determine its ultimate disposition. There were several types of chemical analyses required. Until the analysis was finalized and reviewed by a competent authority, the soil was held on-site. Only soil that met cleanliness criteria (as outlined in 40 CFR 261) was used as fill material at Site 1. Subsequent to work at Site 1, the BCT prohibited return of any soil to any property owned or operated by the Memphis Depot Caretaker Division. Prior to this mandate, 600-cubic yards of known clean soil that had been excavated from Site 1 was returned to Site 1 pit as fill material. With the exception noted in paragraph 2.8.4 all soils were disposed of off-site by one of the approved methods outlined in the T & D Plan

Table 6: Disposition Paths For Waste Streams

Category	Treatment	Disposal	Comment
1 Soil tested for Regulatory Compliance Per 40CFR Part 261 but contains Foreign Debris	1a Soil that passes TCLP 1b Soil that fails TCLP	Subtitle D Landfill Waste Management Landfill, Tunica, MS Permit No SWO720010459 Subtitle C Landfill Waste Management Landfill Emelle, AL RCRA Part B Permit No, ALD000622464	After treatment to meet LDR standards
2. HTRW Contaminated Soil	N/A	Subtitle C Landfill Waste Management Landfill Emelle, AL RCRA Part B Permit No, ALD000622464	After treatment to meet LDR standards
3 Mustard Degradation by-product Contaminated Soil	Incineration Clean Harbors Kimball, NE Permit No NEO203238 EPA ID NED981723513	Monofill Landfill At Clean Harbors Site, Kimball, NE Permit No NEO203238	
4. Mustard Contaminated Soil	Incineration Clean Harbors Kimball, NE Permit No NEO203238 EPA ID NED981723513	Monofill Landfill At Clean Harbors Site, Kimball, NE Permit No NEO203238	
5 3X Material	Incineration Safety-Kleen Colfax, Louisiana RCRA Part B, Subpart X Permit: LAD981055791	Subtitle C Landfill Safety-Kleen Lome Mt 5 miles East and 1 mile North of Jct 281 & 412 Waynoka, OK EPA Permit No. OKD065438376	All 3X material treatment will meet or exceed DA Pam 385-61 requirements
6 Investigative Derived Waste Water	6a Non-Contaminated 6b Contaminated Water	Discharge into Memphis Sewer System Treatment by sanitary sewer treatment Subtitle C Landfill Waste Management Landfill Emelle, AL RCRA Part B Permit No, ALD000622464	Authorization MUST be granted by Memphis Public Works No comment
7. Mustard Degradation By-Product Contaminated Water	Incineration Clean Harbors Kimball, NE Permit No. NEO203238 EPA ID NED981723513	Monofill Landfill At Clean Harbors Site, Kimball, NE Permit No. NEO203238	A waste disposal license was issued for the ash monofill by the Nebraska Dept of Env Quality (NDEQ)
8 Mustard Contaminated Water	Incineration Clean Harbors Kimball, NE Permit No NEO203238 EPA ID NED981723513	Monofill Landfill At Clean Harbors Site, Kimball, NE Permit No. NEO203238	A waste disposal license was issued for the ash monofill by the Nebraska Dept of Environmental Quality (NDEQ)
9. Ordnance and Explosives	Incineration Safety-Kleen Colfax, Louisiana RCRA Part B, Subpart X Permit LAD981055791	Total Consumption through incineration	Thermal treatment was in compliance with DA PAM 385-61 to fulfill conversion of 3X to 5X material A licensed explosive transporter provided transport.

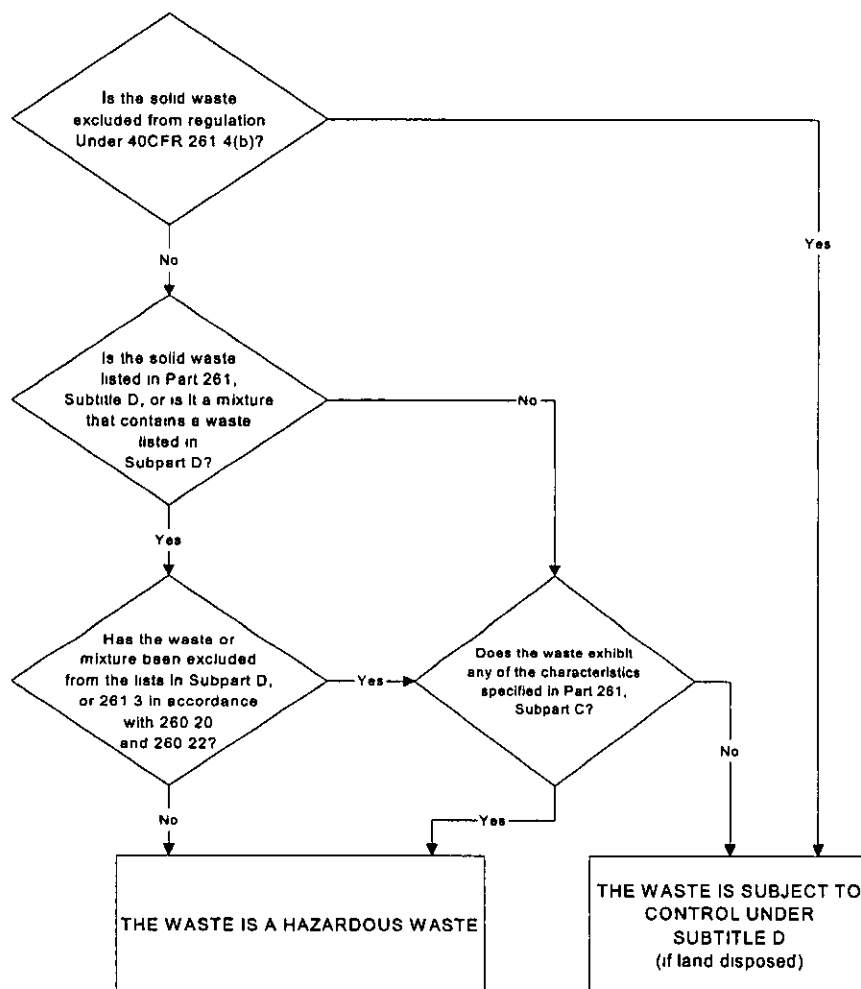
2.5.4.1 CWM/Mustard Degradation Characterization

The first criteria were that the soils contain no detectable CWM or mustard degradation by-products. Excavated soil was sampled and tested for CWM and mustard degradation by-products before it was removed from the VCS. No recovered soil contained CWM above the airborne exposure limit (AEL). Soil did not depart the VCS until this level of protection was confirmed. No airborne CWM exposure was ever recorded.

2.5.5 Waste Determination

Soils that proved free of CWM or mustard degradation by-products were sampled for levels of HTRW constituents. The samples were extracted using EPA TCLPs. The extract was analyzed for metals, volatiles, semivolatiles, herbicides, pesticides, and pH. The process outlined in Figure 5 defines the waste determination process.

Figure 5: Waste Determination Flow Diagram



2.5.6 Profiling

Profiling Responsibility. CWA and HTRW soil analysis data were reviewed to determine the chemical profile for each waste shipment. This determination was based on the highest range within composite samples and on a review and comparison of the following determinations.

- CERCLA Determination. CERCLA regulations applied to all generated waste.
- Required Characteristics and Physical Properties. The following characteristics and physical properties were reviewed to aid in waste profiling:
 - Manufacturer's information
 - Material Safety Data Sheets (MSDS)
 - Physical characteristics
 - Analytical data gained from testing and/representative sample(s)
 - Physical Description
 - Phases/Layers
 - Color
 - Physical State
 - Density
 - pH (if liquid)
 - Free Liquid (Visual Determination)
 - Compatibility Test
 - Water Reactivity
 - Ignitability
- 40 CFR 261.4(b). Reference for determining if solid waste was excluded from regulation under 40CFR 261.4(b)
- 40 CFR Part 261, subpart D. Reference in determining if solid waste was listed under, or if it is a mixture that contains, a waste listed in subpart D.
- DOT 49 CFR. Reference for determining proper shipping name using hazardous materials table.

2.5.7 Shipping Manifests

Shipping manifests were prepared in accordance with U.S. Department of Transportation (DOT), state, and U.S. Environmental Protection Agency (EPA) guidelines (i.e., reference DOT 49 Code of Federal Regulations (CFR) and USEPA 40CFR). Copies of all shipping manifests are located in Appendix D.

2.5.8 Transportation

Action Resource, Inc. and/or Ferguson Harbors, Inc. loaded waste material for transport. Action Resources transported the waste materials.

2.5.9 Soil/Water Sample Results

Waste sample analytical results are contained in Appendix E.

2.6 Water Supply

Fresh water was required for decontamination, steam-washing of vehicles and equipment, and dust control. A fire hydrant served as the primary water source for this water. A 350-gallon

water tank was securely affixed to a pallet. A forklift transported water to/from the source. A garden hose, connected to a submersible sump pump, distributed the water to areas requiring water. Though the water was potable, personnel were not permitted to consume this water. Drinking water was purchased from a local vendor.

2.7 Summary of Project Logistics

2.7.1 Support Equipment

ECBC provided all analytical equipment required to test investigative derived waste for CWM.

TEU provided all necessary equipment and materials required to operate a personnel decontamination station.

The VCS used at Sites 1 and 24-A was leased from Sprung Instant Structure, Inc., West Jordan, UT. The VCS used at Site 24-B was leased from Mahaffey Tent Company, Memphis, TN.

2.7.2 Vehicles

A combination of UXB owned and rental vehicles was used.

UXB owned vehicles included one Ford Explorer, one Toyota extended cab pickup with cap, and one Toyota pickup.

Rental vehicles came from the local companies: Enterprise Rental Cars and Dollar Rental Car in Memphis, TN. The quantity and type of rental vehicles varied as the project progressed.

2.7.3 GFE Equipment

GFE items provided from other government funded projects:

- Computer and Printer

2.7.4 Items Purchased and Submitted to the Government at Project Completion

- | | |
|-------------------------------|--|
| • Bottle, Air, 60 minutes (4) | • Saw, Skilsaw (1) |
| • Backpack w/o mask (1) | • VHS Player (1) |
| • Backpack w/ mask (3) | • Video monitoring system w/4 cameras each (2) |
| • Calculator (1) | • Trellaborg Level A PPE Suit (4) |
| • Case, Carry Interspiro (6) | • Test Set, Trellaborg (1) |
| • Eyewash Station (2) | • Thermometer, oral; medical use (1) |
| • Fan, electric (4) | • Tank, water 350 gallon (1) |
| • Fax Machine (1) | • Drill, electric, hand (1) |
| • Fire extinguisher (2) | • Safe, Brinks (1) |
| • First Aid Kit (6) | • Shredder, document (1) |
| • Four-gas Monitor (2) | |
| • Regulator, 6000 psi (2) | |
| • Regulator, w/hose (3) | |

2.7.4.1 UXB Equipment

- Radio, HT-1000 (20)
- Forester, MK 26 (1)
- Video Camera (1)
- Digital Camera (1)
- Computer, Laptop (2)
- Heat Stress Monitor (1)
- Demolition Kit (1)
- Emergency Escape Packs (10)
- Steam Washer (1)
- Sump Pump (1)
- Sound Meter (1)
- Schonstedt, Gradiometer (1)
- Cell Phones (2)

2.7.4.2 Leased Equipment

- Copy Machine – Diversified Copy
- Photovac Meter – Total Safety
- PDM-3 MINIRAM Dust Meter – Total Safety
- Flame Ionization Detector (FID) – Total Safety
- Sky Trac Extended Reach Forklift – United Equipment, Inc. (name changed to Future Rental Services)
- Office Furniture – Aaron's Furniture
- Office Trailers – Pac-Van Rentals
- Porta-Potties – Safety Lights
- Concrete Barriers (Jersey Barriers) – CPI
- Wheeled Loader w/mine-X converter- Excell
- Excavator w/mine-X converter – Excell
- 40' Storage Container – Pac-Van
- Water Truck, dust abatement – United Equipment, Inc.
- Dump Truck – Hertz Equipment Rental, Inc.
- Freezer for Ice (for soil samples) -- CWS Pure Memphis
- Portable Electric Generators – Brambles Equipment Services, Inc.

2.7.4.3 Facilities

Portable offices, leased from Pac-Van Rentals, served as

- Administrative Office
- COE, Memphis District On-Site Office
- Crew Break Trailer
- Command Post

2.7.4.4 Equipment Storage

Equipment was secured in a 40-foot storage container leased from Pac-Van Rentals.

2.8 Technical Effort/Work Performed by Site

USAESCH and UXB jointly decided the sequence to investigate Site 1, Site 24-A, and Site 24-B, respectively. This section addresses the events for each investigation event, by site.

2.8.1 Site 1

Site 1 is located in the northern most part of Dunn Field (Appendix B, Map B-1). The Archive Search Report (ASR) estimated burial pit dimensions as 30-feet wide by 30-feet long by 10-feet deep.

This site was suspected of containing chemical agent identification sets (CAIS) containing small quantities of diluted agent. The military used CAIS to train personnel in the use of CWM identification and detection. It was unknown if CAIS would be recovered intact and in their original containers, if individual vials would be randomly recovered throughout the burial pit, or if the CAIS were placed in CWM containers known as "pigs" -- thick walled metal containers specifically designed for storage of CWM items

Because of the possibility of encountering individual vials, a sifting operation was used to locate the small CAIS vials. This involved placing excavated soil into a device that separated coarse soil from fine soil, and placing them into separate collection bins. Large clumps of soil were broken apart by the first separation sequence, known as the "grizzly grid." The now broken clumps of soil were transported to a second (3-inch) separation grid. Smaller portions of soil passed through to a third separation grid. Soil remained in clear view of shaker table operators at all times; thus, permitting observation of suspect CWM/UXO items. Course material and fine material were separated and placed in different containment bins. This process ensured that UXO personnel visually screened all excavated soil for the presence of CWM/UXO.

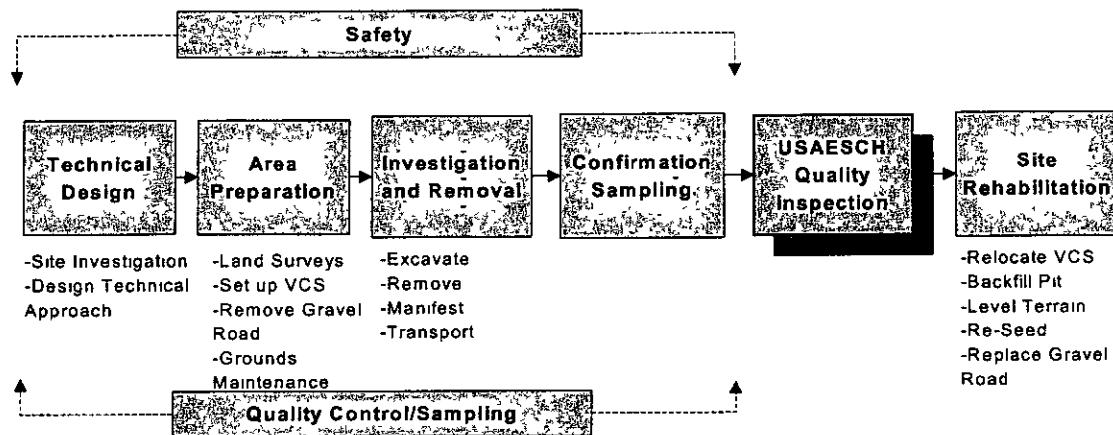
Personnel exposure to chemicals of concern (COC), as listed in Table 7, remained in the forefront of concerns throughout the project, and warranted the wearing of modified-Level B PPE within the VCS during all excavation activities. Personnel working inside the VCS and personnel decontamination station (PDS) wore modified-Level B when a release of CWM was possible. Burial of glass ampoules, possibly containing small quantities of CWM, further compounded the need for the use of modified-Level B PPE. Breakage during excavation presented a real concern.

Table 7: Chemicals of Concern – Site 1

Chemicals of Concern
Mustard (H)
Lewisite (L)
Thiodiglycol (TDG)
1, 4-Dithiane
1, 4-Oxathiane
Chloroform
Chloropicrin (PS)
Phosgene (CG)
Chloroacetophenone (CN)
Adamsite (DM)
Arsenic

2.8.1.1 Work Sequence

Refer to Figure 6 for a graphic illustration of the work sequence at Site 1.

Figure 6: Work Sequence at Site 1

2.8.1.2 Technical Design

The technical approach for Site 1 involved full excavation of the site and use of a shaker table to capture the CAIS vials that may have been present. The excavator operator and ground guide carefully scanned soil for suspect items. If no items were observed, the soil was placed into the front-end loader bucket and transported to the shaker table. The shaker table broke apart large clumps of soil and segregated it into coarse and fine material. Shaker operator personnel inspected all soil departing the shaker for suspect items. An emergency "stop" button was positioned within arms-reach of the operators to stop all operations if a suspect item was observed. This process continued until all excavation was completed.

2.8.1.3 Area Preparation

Site 1 was located on level terrain. With the exception of digging into part of an elevated gravel road, minimal area preparation was required.

2.8.1.3.1 Land Survey

USAESCH provided boundary coordinates in Tennessee State Plane North American Datum (NAD) 83. A Tennessee registered and licensed surveying company ensured absolute accuracy in marking site boundaries. Appendix B, Map B-2 contains a map of this site and its coordinates. Table 8 identifies the coordinates for Site 1.

Table 8: Site 1 Search Area Coordinates

Southwest	Northwest	Northeast	Southeast
N=281.442.0 E=802.340.0	N=281.487.0 E=802.339.0	N=281.487.0 E=802.402.0	N=281.441.0 E=802.403.0

2.8.1.3.2 Removal of Gravel Road

A gravel road traversed the southern portion of the Site 1 search area. Other environmental contractors used the road to access monitoring wells. USAESCH approved removal of the gravel road, provided the road was replaced at the conclusion of the project. UXB personnel operated a backhoe/front end loader to remove this gravel road.

2.8.1.3.3 Set-up of the VCS

A 70-foot diameter VCS was set up on Site 1.

The Senior UXO Supervisor (SUXOS) and the USAESCH Safety Specialist were on-site to ensure Occupational Safety and Health Administration (OSHA) and Corps of Engineers (COE) safety practices were enforced and to oversee the construction.

2.8.1.3.4 Grounds Maintenance

Tall grass became a fire issue, and a worker discovered a snake crawling in the grass. The Memphis Caretaker Department provided a grass cutting crew to cut grass on Dunn Field Property. In the interest of safety, the USAESCH Safety Specialist required all non-project personnel to remain 50-feet from any project structure. Project personnel, using hand-held grass trimmers, performed grass trimming within 50-feet of these structures.

2.8.1.4 Investigation and Removal

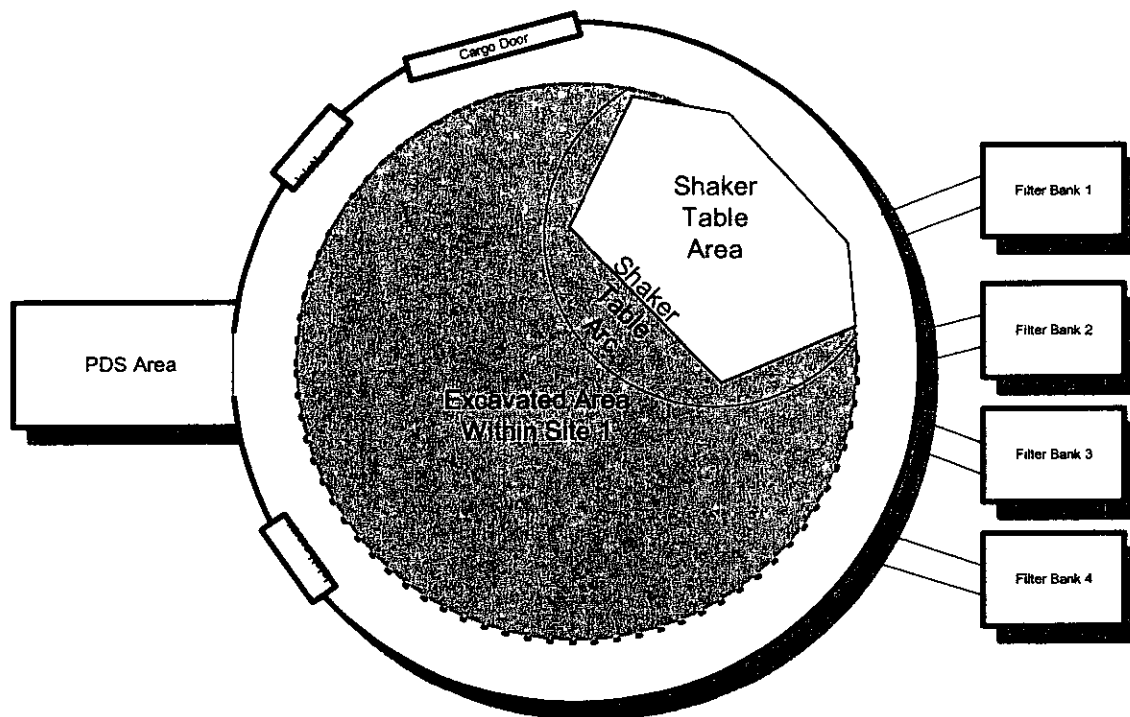
Figure 7 graphically depicts the excavation area with the original placement of the VCS. Note that excavations did not occur within the shaker table operational arc.

Investigation and removal teams consisted of five personnel – one excavator operator, one ground guide, one backhoe operator, and two shaker operators. Investigation and removal teams rotated at the completion of each set. One set consisted of the following steps:

- The ground guide directed the excavation operator to excavate in a given area.
- While the soil was in the bucket, the excavation operator inspected the soil for visible evidence of the CAIS vials. If CAIS vials were not present, the soil was put into the front-end loader until it was full. NOTE: CAIS vials were not discovered.
- The soil was then sampled -- 1 spoon of soil was taken from each bucket as a composite sample, put into a stainless steel bowl. The interim samples were homogenized when shaker collection bins were full. The composite sample was placed in a plastic bag and double wrapped, numbered, and chain-of-custody transferred to ECBC. The sample ratio was approximately every three cubic yards
- The soil was then placed into the shaker, which separated fine from coarse soil/materials.
- Prior to placing soil in the bin, the bin was dusted to remove any dirt.

- After placing soil in the bin, the open top was sealed with plastic sheeting to contain any vapors.
- The bin was headspaced and stored. All soil at Site 1 passed CWM clearance through headspace.
- Bins containing HTRW and foreign materials were manifested and transported.

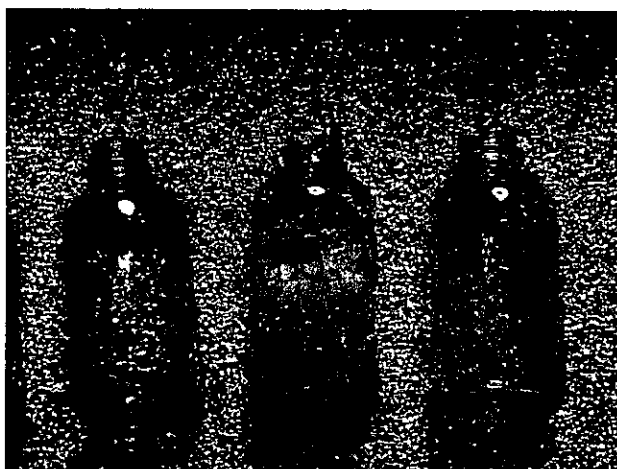
Figure 7: Excavation Area



2.8.1.4.1 Results of Site 1 Operations

The target items reportedly buried at Site 1 were not discovered. Though miscellaneous items recovered and the presence of glass shards proved the area was a burial site, no CWM was recovered, and no CWM was detected either through airborne monitoring or soil sampling. The following is an itemized list of discoveries at this site:

- No CAIS items or CWM contaminated soil were found within the investigation area.
- GLASS shards and jars were recovered, confirming the area as a burial pit. Twenty-four jars, labeled "HS"—Sulfur Mustard were recovered, but sample analysis proved the jars to be free of CWM. (Figure 8)
- Soil samples proved the soil free of chemicals of concern.
- Air monitors and DAAMS sampling produced negative results for all chemicals of concern to include CWM.

Figure 8: HS Glass Containers

- Glass vials, containing sodium hydroxide tablets, were recovered on the western edge (sodium hydroxide is used for water purification). It was apparent that the vials were in a pit that extended beyond the defined boundary of Site 1. The sodium hydroxide tablets were considered an HTRW issue; versus CWM, and excavation beyond the investigation area was not performed.
- Investigative Derived Waste results are detailed in Table 9.

Table 9: Waste Streams for Site 1

Waste Streams			
Item Ref.	Waste Category	Quantity	Remarks
1	Soil Containing Foreign Debris	80 cu yds.	Disposition: Placed in a RCRA Subtitle D Landfill
2	HTRW Contaminated Soil	100 cu. yds.	Disposition: Placed in a RCRA Subtitle D Landfill
3	Mustard Degradation By-Product Contaminated Soil	0	
4	Mustard Contaminated Soil	0	
5	3X Material	0	
6	HTRW Contaminated IDW Water	165 gallons (Chloroform Contaminated)	Disposition 3,465 (U.S.) gallons of clean IDW water was discharged into the Memphis Sewer System from this site.
7	Mustard Degradation By-Product Contaminated Waste Water	0	
8	Mustard Contaminated Waste Water	0	
9	Ordnance and Explosives	0	

This evidence does not negate the theory that CAIS sets were buried at this location. Since all of the recovered items were empty, and the soil was void of CWM, it suggests that CWM related glass containers buried at this location did not contain CWM at the time of burial.

2.8.1.5 Site 1 (Phase II)

When the expected items were not recovered, UXB reviewed the EE/CA findings, and used geophysical instruments to evaluate the immediate area surrounding Site 1. This investigation revealed the presence of large magnetic anomalies on the eastern side, immediately adjacent to the Site 1 area.

The USAESCH Project Manager directed a formal geophysical investigation by a U.S. Army Corps of Engineers geophysical team. The geophysical team conducted a validation survey on each of the three investigation sites, and they confirmed the presence of large magnetic anomalies in the location indicated by UXB's magnetometer and gradiometer investigation. The geophysical team's instruments also identified the locations of subsurface soil disturbances. Based on this data, USAESCH directed continuation of the investigation, including these highly suspect areas (Appendix B, Map B-2).

In order to accommodate this phase of the investigation and removal, UXB removed more of the gravel road surface. An overhead crane then moved the VCS to the second Site 1 (Phase II) location. The PDS, air supply system, and monitoring equipment were set up to support investigation. Since the target items were large, shaker operations were not necessary.

Magnetometers and gradiometers, plus a geophysical map provided by the USAESCH were used to re-acquire the locations of the selected subsurface soil disturbances.

2.8.1.5.1 Results of Site 1 (Phase II) Operations

The large anomalies proved to be sections of railroad rails and other large metallic debris. No CWM or CWM related material was discovered at Site 1 (Phase II).

2.8.1.6 Confirmation Sampling (Quality Assurance)

UXB supported CH2M Hill with the collection of soil confirmation samples. CH2M Hill trained UXB personnel to collect confirmation samples, and they provided all of the required sampling equipment and materials. CH2M Hill requested the following soil samples at Site 1:

- two (2) samples from the bottom of the pit
- four (4) samples from the sidewalls

2.8.1.6.1 Confirmation Sampling Results for HTW Compounds

Final soil sample results for HTW compounds are located in Appendix O. Precise site evaluation is provided in the Dunn Field Remedial Investigation (RI) that is being compiled by CH2M Hill.

2.8.1.7 U.S. Army Engineering and Support Center Quality Inspection

Prior to the close out of Site 1, UXB and USAESCH prepared an exit strategy to present to DLA. The exit strategy detailed the work performed, the additional geophysical work conducted, the excavation results at Site 1 and Site 1 (Phase II), and the confirmation sampling.

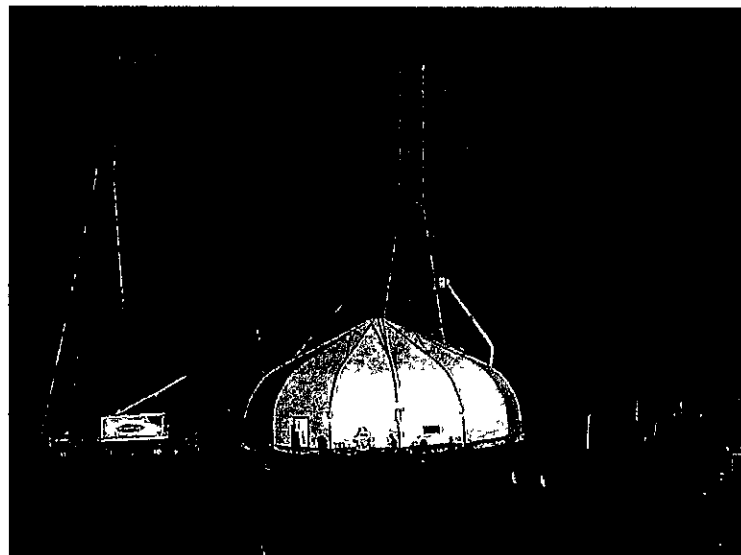
DLA concurred that all reasonable efforts had been taken to recover the suspected CAIS and that continued work at this site was not justified.

2.8.1.8 Site Rehabilitation

At the closure of Site 1 activities:

- The area was surveyed to document the precise excavation area
- An overhead crane was used to relocate the VCS to Site 24-A. This required assistance from the Memphis Gas, Light, and Power to re-route power from the two overhead power grids passing through Dunn Field. The height of the crane boom and power cable was measured. Given the high voltage passing through the power lines, an electrical arc between the crane boom and power line may have occurred had the power remained active. To eliminate this lethal hazard, the power company agreed to re-route the power to alternate grids to permit transit of the crane beneath the power line. Two separate power grids pass through Dunn Field. The power company representative coordinated with site personnel to set a definite time for movement of the VCS. This time was crucial, as power could only be transferred at set times, due to power demands. On the day of transit (August 8, 2000) electrical utility personnel re-routed electrical power from the first grid to the second grid as the boom of the crane passed beneath. As the boom approached the second grid, power transfer was re-directed to the first grid. All original routing was returned when the crane was clear of the area. Figure 9 is a photograph of the VCS moving beneath the power lines
- The pit was backfilled – 600 cubic yards of clean soil was returned to the pit; DLA provided approximately 298 cubic yards of stockpiled clean soil.
- A front end loader was used to level the terrain
- The area was re-seeded with indigenous grass.
- The gravel road was replaced – gravel from the original road and newly-purchased gravel were used.

Figure 9: Movement of VCS from Site 1 to Site 24-A



2.8.1.9 Significant Challenge at Site 1

Heat stress became a major health and safety factor at Site 1, as work continued into the summer months. Wet Bulb Globe Temperatures (WBGT) routinely reached 75 degrees by 0700 hours. A work/rest regime of 25% work and 75% rest was required to ensure worker safety.

Health and Safety professionals from UXB, USAESCH, and an independent firm were consulted on the heat stress concerns at Dunn Field. A number of possible solutions were taken to provide heat relief to site workers. These initiatives included:

- strict adherence to work/rest regimes outlined in the Final Safety Submission
- use of cooling vest (purchased from Interspiro)
- use of an airline cooling system to cool line supplied air (provided by ECBC)
- use of air circulation fans in working areas
- adjusting work start time to early morning hours when ambient temperatures are lower. This required installation of lighting fixtures to meet OSHA illumination standards in all work areas.

Heat stress remained a constant concern well into the fall months, but became manageable with the implementation of the aforementioned initiatives. No heat stress injuries were encountered.

2.8.2 Site 24-A

Site 24-A was the burial pit for 29 drained bomb casings. After the chemical warfare filler was emptied from the bomb casings in 1946, the casings were placed in this pit, dynamite was detonated in close proximity of bomb cases to cause sympathetic detonation of any remaining explosive materials, and the cases were buried. The location of this site is reflected in Appendix B, Map B-3.

The chemicals of concern are listed in Table 10.

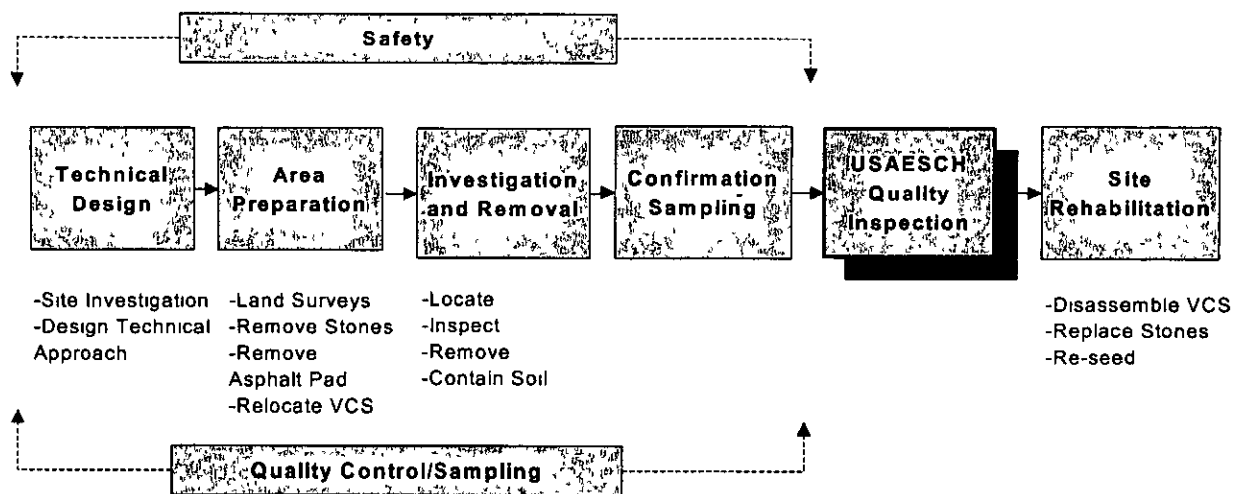
Table 10: Chemicals of Concern at Site 24-A

Chemical of Concern
Mustard (H)
Thiodiglycol (TDG)
1, 4-Dithiane
1, 4-Oxathiane

2.8.2.1 Work Sequence

The work sequence for Site 24-A is reflected in Figure 10.

Figure 10: Work Sequence at Site 24-A



2.8.2.2 Technical Design

The approach to expediting the recovery of the 29 bomb casing initially involved investigating areas of high magnetic signatures, and then proceeding to less magnetically active areas. Since bomb casings yield a significant magnetic signature, the VCS was positioned at these locations first. Anomaly discrimination is not an absolute science; however, it did provide reasonable direction on the most probable areas for the buried bombs.

2.8.2.3 Area Preparation

Area preparation required placement of survey markers to define the search area, removal of a section of an asphalt pad, removal of large stone placed for erosion abatement, and positioning the VCS.

2.8.2.3.1 Land Survey

USAESCH provided boundary coordinates in Tennessee State Plane NAD 83. A Tennessee registered and licensed surveying company ensured absolute accuracy in marking site boundaries. Appendix B, Map B-3 contains a map of this site and its coordinates. Table 11 identifies the coordinates for Site 24-A.

Table 11: Site 24-A Search Area Coordinates

Southwest	Northwest	Northeast	Southeast
N=280.141.9 E=802.045.3	N=280.218.0 E=802.045.0	N=280.221.0 E=802.176.0	N=280.142.0 E=802.173.0

2.8.2.3.2 Removal of Asphalt Pad

A portion of the investigation area encompassed an asphalt parking area. DLA authorized removed of the asphalt section to facilitate investigation of the area.

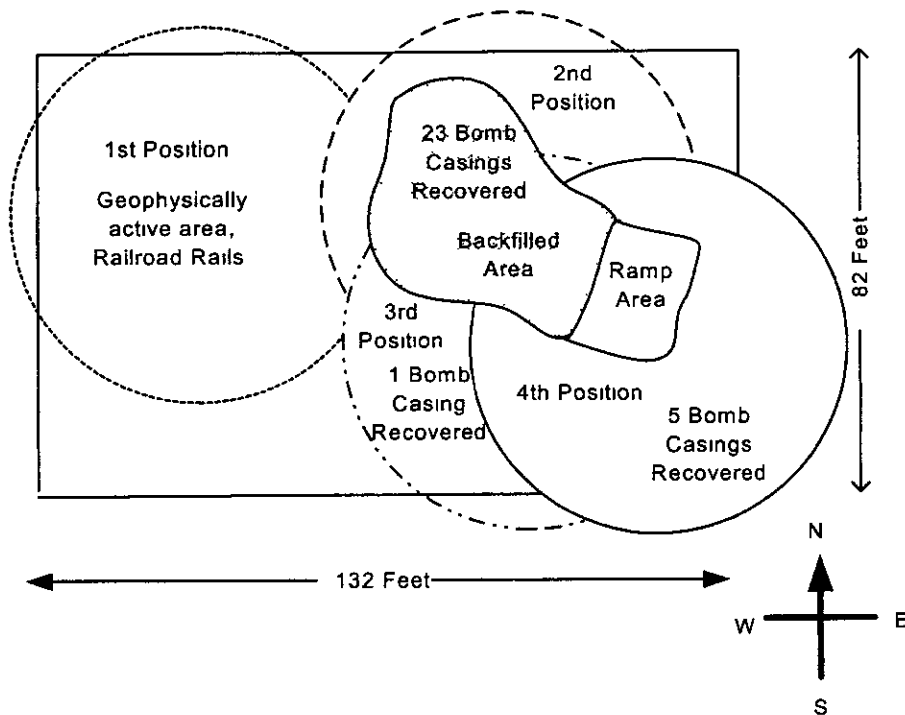
2.8.2.3.3 Removal of Erosion Control Stones

Large stones were located in run off areas of the search site; they were mainly used in drainage areas to prevent erosion. To permit a footing seal of the VCS these stones were removed and staged in an area outside the work area.

2.8.2.3.4 Positioning VCS

The VCS was relocated from Site 1 to Site 24-A, where it was ultimately positioned at four locations (Figure 11). An overhead crane was used to move the VCS to each location. Relocation required re-establishing the PDS, support structures, and monitoring equipment. The command post and crew break trailer were centrally located to eliminate the necessity of moving them each time a new VCS position was required.

Figure 11: VCS Positions at Site 24-A



2.8.2.4 Investigation and Removal

The search area measured 82-feet wide by 130-feet in length, and the entire search area was magnetically active with buried ferrous material. The VCS was located in four positions in this search area (Figure 11). At each position, UXB used magnetometers and gradiometers to detect and select the magnetic anomalies with the highest magnetic reading; these areas were then marked with paint and pin flags. All of the marked disturbances were mechanically excavated to the depth required to remove the anomaly and to access clear soils.

Operations began in the northwest corner (Figure 11), as this was the most geophysically active area. The geophysical map revealed areas of high mass and linear ferrous targets. Magnetic signatures were highly representative of bomb-like objects; however, intrusive investigation revealed their identify as railroad rails.

From this location, the VCS was re-located to the east (Figure 11), and excavation continued. During the second VCS move, 23 bomb casings were recovered.

At the third position, and for safety reasons, excavation was not permitted within 10-feet of the VCS sidewall. The outline of the pit was apparent and the VCS was repositioned in the direction of the pit (southeasterly direction) to continue along the pit footprint. One bomb casing was recovered at the third VCS position.

The lay of the trench continued beyond the permissible reach of excavation, and the VCS was relocated to a fourth location (Figure 11). The remaining 5 bomb casings were recovered at this location.

The certificates of inspection for UXO items are located in Appendix F.

2.8.2.5 Confirmation Sampling – Site 24-A

UXB supported CH2M Hill with the collection of confirmation soil samples. CH2M Hill trained UXB personnel to collect confirmation samples, and they provided all of the required sampling equipment and materials. CH2M Hill requested the following soil samples at Site 24-A:

- One (1) sample from the bottom of the pit
- four (4) samples from the sidewalls.

CH2M Hill performed the analytical testing and provided the results. The results confirmed the soil faces of the excavation site to be free of CWM. The results of confirmation sampling were included in the exit strategy presented to DLA.

2.8.2.6 U.S. Army Engineering and Support Center Quality Inspection

Prior to the close out of Site 24-A, UXB and USAESCH prepared an exit strategy to present to DLA. The exit strategy detailed the work performed, the geophysical work conducted, the excavation results at the site, and the confirmation sampling. The objectives were met at this site.

2.8.2.7 Site Rehabilitation

The pits were backfilled with DLA provided clean soils.

The asphalt pad was not replaced, as DLA did not desire its replacement.

All erosion abatement stones were replaced in the drainage areas and all excavation sites were leveled and seeded. Straw was placed to aid in germination and stability of the grass seeds.

The VCS was not immediately dismantled as the conclusion of work at Site 24-A. The VCS was relocated to the asphalt pad and used as storage for fiberboard boxes containing mustard contaminated soil and boxes containing mustard degradation by-products. The cost comparison clearly indicated the cost of retaining the VCS to secure and store these waste products more cost effective than constructing a new structure on-site. The VCS was dismantled at the conclusion of the project. The UXB Project Manager submitted a letter of CWM clearance to the Sprung Corporation, declaring the VCS free from CWM and suitable for use at other sites.

2.8.2.8 Results of Site 24-A Operations

- HTRW contaminated soils/materials were shipped off-site for landfill disposal.

- Twenty-five 500 kg FLAM C Incendiary Bomb Casings and four 250-kg FLAM 250 Bomb Casings were recovered. The 29 bomb casings were inspected for the presence of explosives and or explosive residue. Technical data on these munitions are available in NAVORD OP 1666. Physical dimensions of each bomb were compared to reference data to affirm positive identification. After positive identification, areas of the bomb casings known to contain fuzing mechanisms and explosive materials were thoroughly inspected.
- None of the 29 bomb casings were fuzed or possessed fuzing mechanisms to cause a detonation of the bombs; however, two of the bomb casings contained intact bursters that could not be examined without applying excessive force. The Dunn Field Archive Search Report stated that a secondary explosion was observed when dynamite was detonated at the skin of bomb cases in 1946. This suggests that some of the FLAM 250 bombs may have contained a burster charge. The burster charge consists of 1.25 kilograms of TNT (trinitrotoluene). The burster tube houses the burster charge. The burster tube is positioned in the center of the bomb casing by welded baffle plates. The normal geometry of the bombs was significantly changed by the dynamite countercharge in 1946. This presented some difficulty in obtaining access to the centerline burster tube. In some cases, the burster tubes were outside of the bomb casing. All but two of the burster tubes were certified free from explosives. The two suspect burster tubes, from the FLAM 250 bomb casings, were sealed with a wooden plug. Normal force was applied to remove the wooden plug to no avail. The use of excessive force was forbidden due to the possibility of subjecting explosive material to heat, shock, and friction. The decision was made to remove the burster tubes from the bomb casings by pulling the already weakened baffle plates. Very little pressure was required to remove the burster tubes. It was hoped that the burster tubes would have a deteriorated section where access could be achieved. This was not to be the case, as both burster tubes remained intact and physically sound.

The burster tubes were classified as suspected live (explosive laden) components and were segregated from the known inert items.

The two suspect components were head spaced for CWM. CWM testing was negative. Items were then double-wrapped and sealed with plastic sheeting.

After consultation with ECBC and the USAESCH Safety Specialist, the two burster tubes were secured inside the Interim Holding Facility (IHF) to await offsite disposal. The work plan permitted on-site disposal of any UXO; however, in the interest of safety of local residents, DLA and local authorities restricted the use of explosives on-site. Safety-Kleen operates a RCRA Part B Subpart X incineration facility located in Colfax, Louisiana, and they were contracted to dispose of the suspect items.

The two suspected live burster tubes were transported to the Safety-Kleen Facility and incinerated. The incineration process exceeds requirements outlined in DA PAM 385-61 for conversion of 3X material to agent symbol 5X.

- Waste streams are summarized in Table 12

Table 12: Waste Streams for Site 24-A

Waste Streams for Site 24-A			
<i>Item Ref</i>	<i>Waste Category</i>	<i>Quantity</i>	<i>Remarks</i>
1	Soil Containing Foreign Debris	260 cu. yds	Disposition: Placed in a RCRA Subtitle D Landfill.
2	HTRW Contaminated Soil	60 cu. yds.	Disposition: Placed in a RCRA Subtitle C Landfill
3	Mustard Degradation By-Product Contaminated Soil	900 cu Yds	Disposition: Incinerated (initially soil was stabilized/fixated and placed in a RCRA subtitle D Landfill. – this procedure changed after the TDEC reported health problems at PCI.
4	Mustard Contaminated Soil	0	
5	3X Material	29 bomb casings, STB drums, (e g all metallic material from pit. (6,725 lbs.)	Disposition Incinerated in accordance with DA PAM 385-61.
6	HTRW Contaminated IDW Water	935 (U S.) gallons	Disposition: 550 gallons (U.S.) gallons of uncontaminated water were discharged into the Memphis Sewer System. 385 gallons (US) were treated and placed in a RCRA Subtitle C Landfill.
7	Mustard Degradation By-Product Contaminated Waste Water	0	
8	Mustard Contaminated Waste Water	0	
9	Ordnance and Explosives	5.5 lbs TNT (suspected live burster tubes)	Disposition: Explosive components from two 250 kg bombs (burster tubes) were incinerated in a RCRA Part B, Subtitle X permitted facility. Weight estimated per OP 1666.

2.8.3 Site 24-B

The Site 24-B search area (Appendix B, Map B-4) encompasses an area 90-feet wide by 150-feet in length. The ASR reported the neutralization pit dimension as 7-feet wide, 30 long with a maximum depth of 12-feet. The neutralization pit (chlorinated lime pit) was used to neutralize the contents of the 29 sulfur-mustard bombs in 1946. The pit area was relatively small in

comparison to the search area. Geoprobe sampling provided valuable direction when determining the pit location.

Heat stress concerns were replaced with cold stress issues. Two construction heaters were purchased to heat the PDS and dress out area. The heaters not only improved personnel safety from cold stress, but also prevented decontamination liquids from freezing. An unexpected problem arose with air supply due to the cold temperatures. Cold weather prevented proper operation until the system could be warmed. Disconnecting air supply regulators from the air banks and placing them in the heated Administrative Office quickly resolved this problem. During excessively cold days, heat from the construction heater was vented to regulators to prevent freezing. Water in the supply container froze. Use of a submersible water heater was required.

Ice became a significant health and safety issue due to accumulation on walkways and surfaces. Additional gravel was placed along walkways and vehicular paths.

Chemicals of concern at this site are listed in Table 13.

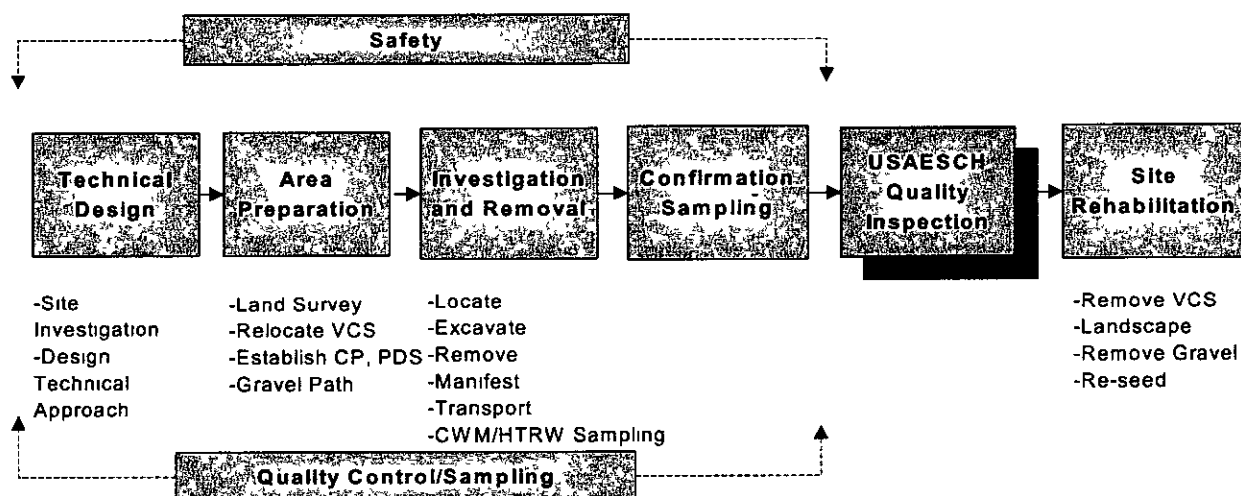
Table 13: Chemicals of Concern – Site 24-B

Chemicals of Concern
Mustard (H)
thiodiglycol (TDG)
1,4-thioxane
1, 4-Dithiane

2.8.3.1 Work Sequence

Refer to Figure 12.

Figure 12: Work Sequence at Site 24-B



2.8.3.2 Technical Design

The methodology to accomplish removal of CWM at the neutralization pit included:

- Locate a portion of the pit through Geoprobe sampling
- Once contaminated soil is located, remove overburden soil to prevent cross-contamination of the clean top layer and the known contaminated soil at deeper depths
- Define pit boundary through soil sampling analysis
- Discontinue excavation when contamination is no longer encountered in the pit area.

2.8.3.3 Area Preparation

The topography of Site 24-B was a flat, with gently sloping terrain on the southeastern portion of Dunn Field. The flat terrain was ideally suited for securing the VCS skirt to the ground surface.

2.8.3.3.1 Land Survey

USAESCH provided boundary coordinates in Tennessee State Plane NAD 83. A Tennessee registered and licensed surveying company ensured absolute accuracy in marking site boundaries. Appendix B, Map B-4 contains a map of this site and its coordinates. Table 14 identifies the coordinates for Site 24-B.

Table 14: Site 24-B Search Area Coordinates

Southwest	Northwest	Northeast	Southeast
N=279.736.0 E=801.989.4	N=279.826.7 E=801.990.3	N=279.826.0 E=802.137.0	N=279.737.0 E=802.138.0

2.8.3.3.2 Construction of Second VCS

A second VCS was needed. All known manufacturers of temporary structures were contacted to discuss engineering controls required of a VCS. Specifications included:

1. The structure must reliably maintain a negative air pressure with the existing filtration system at Dunn Field. The four filter systems are capable of drawing 10,000 cubic feet of air per minute, at full capacity.
2. The structural dimensions must provide a sizable work area and ingress/egress doors of large equipment and a separate personnel door.
3. Construction must be accomplished within 30 days from the date of notice to proceed.
4. No intrusive work would be permitted during construction (e.g. ballast weights must be above ground.)
5. Ports for filter bank inlet ducting must be installed.
6. The structure must be capable of movement by overhead crane or disassembled and reassembled within 5 working days.
7. Sidewalls and ceiling must have a minimum vertical height of 13 feet and 30 feet, respectfully, to permit full extension of excavator arm.
8. The structure must be able to withstand winds of 50 miles per hour and snow loads of eight inches (or ice weight equivalent).
9. The outer fabric/wall material must be impermeable to chemical vapors.

The Mahaffey structure was selected as it offered a work area that measured 80-feet wide x 110-feet long X 13-feet sidewall, with a 26-foot peak in the center. Construction materials consisted of aluminum framing with vinyl coated cloth (similar to the fabric used by Sprung). Top and side panels consisted of a single sheet of fabric giving a near monolithic design. End panels were affixed to the aluminum frame by sliding the fabric end piece through a grooved channel of the frame. The outer edges overlap a 3/8" rope line and are sewn to prevent failure of the connection. All perimeter fabric extended 24" beyond the surface area to permit a near airtight seal when secured with water filled ballast weights and sand bags.

The Mahaffey structure was constructed, pressure tested (negative pressure) and smoke tested by ECBC. The structure passed all tests, and was certified for use as the second vapor containment structure.

Little other area preparation was required to prepare the surface for VCS placement; however, there were no roads leading to the search area and wet conditions presented a slippery surface and hampered vehicular movement. Gravel roads were constructed for vehicle traffic from the hard pack main road and the entrance to the VCS. Gravel paths were constructed for worker transit between the administrative office, command post, break trailer, and VCS.

An earthen berm was constructed along the higher elevated sides of the VCS to prevent encroachment of rainwater. A gutter system was added to redirect rainwater from the eaves of the VCS.

2.8.3.3.3 Gravel Paths

UXB placed gravel paths to make access to the VCS safer.

2.8.3.4 Investigation and Removal

Site 24-B encompassed an area 90-feet wide by 150-feet in length. Total excavation of this area (in search of the neutralization pit) was cost prohibitive. An alternative, but cost efficient, method was needed to locate an area within the neutralization pit. Geoprobe sampling was proposed and reviewed as a viable solution.

2.8.3.4.1 Geoprobe Sampling Operations

USAESCH approved this technology, and a Geoprobe service provider was hired.

Geoprobe operations required far fewer personnel than normal operations. To further increase cost efficiency, Geoprobe sampling was scheduled during a scheduled home leave period. UXB personnel remaining in the area assisted in meeting all staffing requirements to complete the Geoprobe operations.

2.8.3.4.2 "Direct Push" Sampling

Soil probing techniques can be thought of as a subcategory of what are commonly referred to as "Direct Push" techniques. Direct Push refers to tools and sensors that are "pushed" into the ground without the use of drilling to remove soil or to make a path for the tool. A Geoprobe relied on a relatively small amount of static (vehicle) weight combined with percussion as the energy for advancement of a tool string.

Geoprobe sampling was accomplished using this direct-push split-core technique. Sampling points were established at 10-foot offset centers (Figure 13) with a sampling depth of 12-feet. The objective was to detect the Chlorinated Lime layer reported to be present in the lower portion of the neutralization pit. This procedure could permit positive identification of the pit

location, as defined in the EE/CA, and the customer would realize a project cost reduction. Once the precise pit boundary or a point within the pit was determined, excavation would proceed within a confirmed pit location.

A maximum number of 143 bore sites were required to survey the entire Site 24-B search area. Samples were collected at each 4-foot depth interval down to a depth of 12-feet.

CWM, environmental, and personnel monitoring equipment were in place and operating during sampling. The MINICAMS point-source line (located in the VCS) was positioned near the examination table in a manner that enabled it to collect vapors that may be emitted from the core samples.

Each 4-foot clear section of sample core was encased in a 2.5-inch clear PVC or acrylic sleeve. The sleeve was sealed at each end with closure plugs. The sealed sleeve was then placed into a clear plastic bag and into a second plastic bag for a double-seal to prevent escape of vapor. The double-sealed samples were delivered to the Real-time Analysis Platform (RTAP) "hot box" for analysis of head-space vapors/gases.

A chain of custody was completed and the samples were transported to the RTAP and Mobile Environmental Analytical Platform (MEAP) for soil extraction testing.

ECBC Laboratory Technicians performed a soil extraction to quantify the extent of CWM contamination.

Geoprobe sampling began in the area defined by the USAESCH geophysical survey as the most probable pit location, as this area revealed significant subsurface disturbance.

No samples were positive for CWM, but at the third sampling point, the soil analysis reported 1080 PPB of 1,4-thioxane and 1400 PPB of 1,4-dithiane. The constituents are known mustard degradation by-products and gave credence that a portion of the pit had been located.

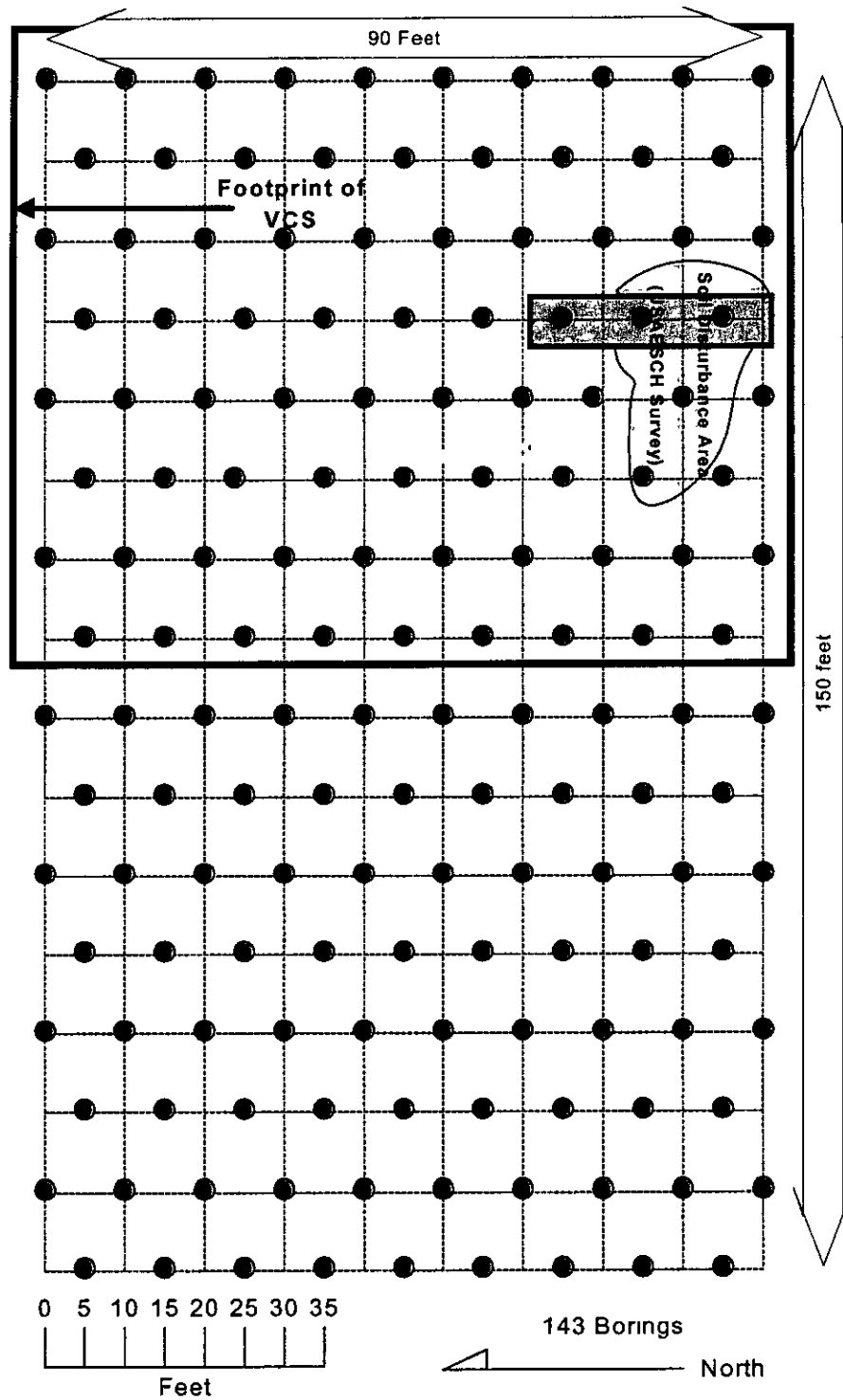
This sample pattern was selected to ensure detection of the pit. This pattern virtually eliminated any possibility of not detecting at least one portion of the pit

Excavation began at the sampling point where Geoprobe sampling revealed soil containing mustard degradation by-products. Approximately 18-inches below ground surface (bgs) a layer of bauxite was discovered that extended to 30 inches bgs. Other debris was discovered to include railroad ties and concrete. Excavated soil was placed into the bed of a 6 cubic yard dump truck. At an excavation depth of 7 ½ - 8 feet, head space testing was positive for mustard and the soil extraction sample analysis revealed 850 PPB of Thioxane; 210 PPB of Dithiane; and 800 PPB of Mustard.

TEU personnel, dressed in Level A PPE, re-entered the VCS and covered the open excavation area with plastic sheeting.

A review of PPE was immediately conducted. There had been no alarm inside the VCS. This could be expected as the freezing point of mustard is about 57.5° Fahrenheit and the ambient temperature inside the VCS was ~ 60°. The low temperatures coupled by the small concentrations of mustard did not produce detectable levels of airborne mustard. After consultation with USAESCH, TEU, and UXB safety personnel, work resumed in modified Level-B PPE.

Figure 13: Geoprobe Sampling Grid



The excavation point was moved approximately 15-feet to the north and excavation continued. Small concentrations of mustard degradation by-products were recovered. At this point the team reassessed the methodology. All soil excavated, thus far, was free of CWM to a depth of seven feet. Excavation to the full depth at each location would cross-contaminate clean soil at shallow depths with CWM contaminated soil at deeper depths. The most efficient course of action was to remove the overburden soil to a depth of 4-feet. This served two purposes: 1) it greatly reduced the quantity of soil requiring expensive handling and treatment, and 2) it permitted full reach of the backhoe arm to a depth of 10 feet bgs.

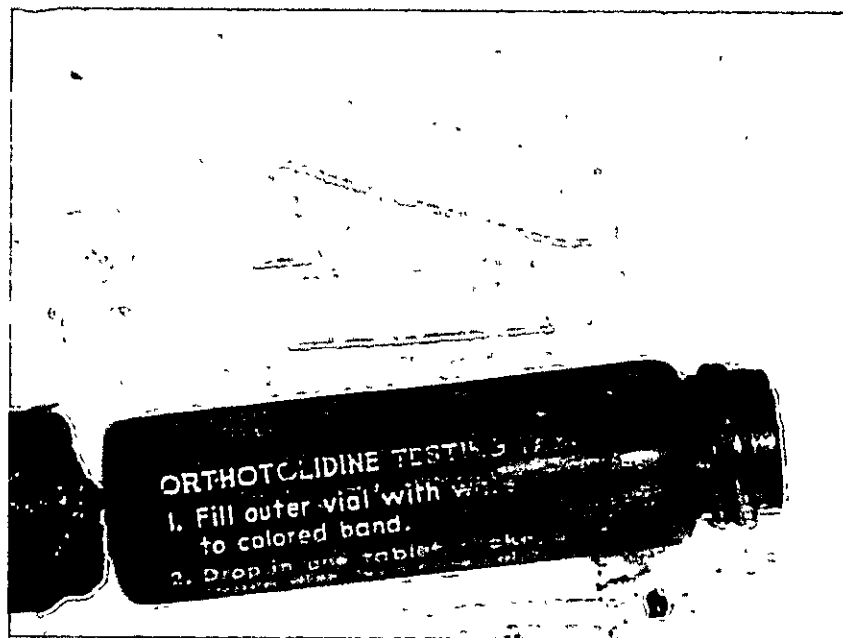
The top layer (overburden) area encompassed an area 40-feet long by 25-feet wide and 4-feet deep and involved removal of 148 cubic yards of soil. The excavation area was sloped to permit ingress and egress of excavation machinery.

Mustard contaminated soil was localized to the area of the first excavation. This "pocket" of mustard contaminated soil was discovered only in this localized area.

Some unexplained MINICAMS false alarms occurred at this site. DAAMS tubes confirmed the alarms as "False." The UXB chemists and supervisors from TEU and ECBC were consulted on this matter. ECBC supervisors advised re-calibration of the MINICAMS gate setting every four hours. It was felt that cold weather and high humidity contributed to the false alarms. The re-calibration procedure greatly reduced the number of false alarms and as warmer ambient temperatures and less humidity approached, the problem no longer existed.

On December 7, several small bottles were discovered with labeling that read: ORTHOTOLIDINE TESTING, (Figure 14). Orthotolidine is used as an indicator for chlorine for the purpose of testing the safety of drinking water.

Figure 14: Water Purification Bottle Recovered from Site 24-B



At approximately 1610 hours on December 11, 2000, the Op-FTIR alerted the SUXOS of the detection of an unknown/suspicious airborne chemical downwind of the VCS. It appeared to have a vapor width of approximately 5 meters. The Op-FTIR field data was electronically transmitted to Edgewood Research, Development and Engineering Center (ERDEC) Chemical

Support Division – Monitoring Branch for in-depth evaluation. Perimeter DAAMS tubes were retrieved and analyzed by the on-site ECBC Mobile Environmental Analytical Platform (MEAP). DAAMS tubes are positioned downwind of the VCS and serve as absolute confirmation or denial of an airborne CWM release. The ECBC Supervisor reported that analysis of the DAAMS tubes confirmed that no release of CWM had occurred. ERDEC reported the Op-FTIR data revealed no CWM. According to ECBC review of the Op-FTIR data, the false positive was caused by moisture (rain) and the rapid drop in temperature as a winter storm moved through the area.

2.8.3.5 Confirmation Sampling – Site 24-B

UXB supported CH2M Hill with the collection of confirmation soil samples. CH2M Hill trained UXB personnel to collect confirmation samples, and they provided all of the required sampling equipment and materials. CH2M Hill requested the following soil samples at Site 24-B:

- one (1) sample from the bottom of the pit
- two (2) samples from the sidewalls

CH2M Hill performed the analytical testing and provided the results. The results confirmed the perimeter surface of the excavation pit to be free of CWM. The results of confirmation sampling were included in the exit strategy presented to DLA.

2.8.3.6 U. S. Army Engineering and Support Center Quality Inspection

Prior to the close out of Site 24-B, UXB and USAESCH prepared an exit strategy to present to DLA. The exit strategy detailed the work performed, the additional geophysical work conducted, the excavation results at the site, and the confirmation sampling. The objectives were met at this site.

2.8.3.7 Site Rehabilitation

- The Mahaffey structure was dismantled immediately after closure of Site 24-B
- The pit was refilled with clean soil provided from the DLA stockpile (the soil was sampled prior to use to ensure it was free of contaminants)
- The gravel paths were removed
- The area was reseeded with indigenous grass

2.8.3.8 Results of Site 24-B Operations

- Waste Streams are identified in Table 15.

Table 15: Waste Streams for Site 24-B

Waste Streams for Site 24-B			
<i>Item Ref.</i>	<i>Waste Category</i>	<i>Quantity</i>	<i>Remarks</i>
1	Soil Containing Foreign Debris	548 cu. yds	Disposition: Placed in a RCRA Subtitle D Landfill.
2	HTRW Contaminated Soil	0	
3	Mustard Degradation By-Product Contaminated Soil	14 cu yds.	Disposition: Incinerated in accordance with DA Pam 385-61.
4	Mustard Contaminated Soil	19 cu yds.	Disposition: Incinerated.
5	3X Material	0	
6	HTRW Contaminated IDW Water	1,760 (U.S.) gallons	Disposition: Treated and placed in a RCRA Subtitle C Landfill. NOTE: No IDW water was discharged into the Memphis Sewer System from this site. All IDW water transported for treatment and/or disposal.
7	Mustard Degradation By-Product Contaminated Waste Water	496 (U.S.) gallons	Disposition: Incinerated.
8	Mustard Contaminated Waste Water	265 (U.S.) gallons	Disposition: Incinerated.
9	Ordnance and Explosives	0	

2.8.4 Significant Events Related to Site 24-B

2.8.4.1 PCI Incident

UXB and USAESCH investigated Pollution Control Industry's (PCIs) performance history and evaluated their capability to treat waste from Dunn Field. PCI was found to be in good standing with the Tennessee Department of Environment and Conservation (TDEC) and the U.S. Environmental Protection Agency (EPA). No notice of violations (NOVs) had been issued to the PCI Millington, Tennessee Facility. After careful review, PCI was selected as the treatment facility for non-hazardous, non-RCRA listed waste.

Between January 18, 2001 and January 25, 2001, sixteen 20-cubic yard roll-off bins containing mustard degradation by-products were transported to PCI for stabilization and fixation treatment (refer to Table 16 for shipment dates and manifest numbers). This treatment involved adding kiln dust to encapsulate metals and pH stabilization, as necessary. Dunn Field specific mustard degradation by-products include: 1,4-thioxane, 1,4-dithiane, and thiodiglycol. These constituents are not a U.S. EPA "Hazardous Waste" per 40 CFR 261.2.

All sixteen roll-offs were stabilized and fixated. Twelve roll-offs containing the treated soil were placed in a RCRA Subtitle D (non-regulated) landfill near Millington, TN – owned and operated by BFI Waste Management, Inc. The disposition of the remaining four roll-offs is explained below.

On January 29, 2001 (four days after PCI received the last Dunn Field waste shipment) UXB was notified of an incident that occurred at PCI involving employee complaints of nausea, dizziness, and sinus irritation. Medical tests of one employee showed elevated enzymes in his liver. Due to the CWM history of Dunn Field, soil sent to PCI became a prime suspect as the

most probable root cause for the complaints. However, on the day employee symptoms originated (January 27), PCI held a potluck dinner at their facility, and a fire broke out in the fuel treatment area – producing clouds of toxic fumes from burning insulation and plastic coverings. Moreover, personnel complaining of the symptoms had not been working with Dunn Field soil.

The USAESCH Project Manager directed an immediate cessation of all waste shipments from Dunn Field to PCI. The Shelby County Health Department, Center for Disease Control (CDC), and TDEC investigated the incident.

UXB, under direction of the USAESCH Project Manager, provided all requested soil sampling data, manifests, and profiles to investigating agencies. Moreover, the USAESCH and UXB Project Managers attended a Shelby County Commission's meeting to address questions relating to waste management procedures and policies employed at Dunn Field.

TDEC immediately forbid the removal of any waste material from Dunn Field until a Transportation and Disposal Plan (T & D Plan) was submitted and approved by them. As a result of the PCI incident, all soil containing mustard degradation by-products were to be incinerated instead of stabilized and fixated.

In mid-February, the USAESCH and UXB Project Managers made an unannounced visit to the PCI facility to collect soil samples from each of the four remaining roll-off bins. The hazardous waste labels on these roll-off bins identified the contents as cadmium contaminated – there were no cadmium concentrations in Dunn Field soil. This gives credence to the suspicion that the Dunn Field waste streams were co-mingled with other waste streams not associated with Dunn Field.

The soil sample results from these four roll offs revealed low levels of mustard degradation by-products:

- Sample PCI/24-A/1033/BOX/0101-023
 - Mustard ND
 - Thioxane 360 PPB
 - Dithiane 630 PPB
 - TDG 750 PPB
- Sample PCI/24-A/1033/BOX/0101-024
 - Mustard ND
 - Thioxane 450 PPB
 - Dithiane 530 PPB
 - TDG 1030 PPB
- Sample PCI/24-A/1033/BOX/0101-025
 - Mustard ND
 - Thioxane ND
 - Dithiane ND
 - TDG ND
- Sample PCI/24-A/1033/BOX/0101-025A – Foreign Debris from Rolloff
 - Mustard ND

- Thioxane ND
- Dithiane ND
- TDG ND
- Sample PCI/24-A/1033/BOX/0101-026
 - Mustard ND
 - Thioxane ND
 - Dithiane ND
 - TDG 610 PPB

The Subcommittee of the County Commissions on Health called a meeting to evaluate the findings from each investigation team. A Shelby County Health Department representative presented an interim paper stating that there is no evidence to support the claim that soil from Dunn Field caused or contributed to the reported illnesses at PCI. The representative further stated that fumes resulting from the fire in the fuel treatment area are suspected of causing the symptoms.

The T & D Plan was approved by TDEC on April 11, 2001, and removal of waste from the site resumed in strict accordance with procedures outlined in the T & D Plan.

The four roll offs (containing treated soil) remained on the PCI staging area of their Millington facility. TDEC restricted PCI from placing soil from these roll offs in a landfill. A public road separates the PCI facility and a major racetrack that draws thousands of spectators each weekend. Though the roll offs were covered, the possibility existed that high winds or a careless worker could remove the covers and expose citizens to fugitive dust. The UXB Project Manager approached the USAESCH Project Manager on removing the four roll off bins and incinerating the soil at the Kleen-Harbors Waste Treatment Facility in Kimball, NE. Prior to accepting PCI as a waste disposal facility, they provided a letter stating that PCI would become the generator after waste soil was treated. In the interest of public safety, USAESCH and the customer agreed to take initiatives to remove the soil from the facility. DLA accepted a cost-share proposition. DLA agreed to fund all removal, transport, and disposal costs of the four remaining roll offs, except for \$5,000 that was to be paid by PCI to cover the costs of disposing the kiln dust material (added by PCI as part of the treatment process-fixation material) and non-hazardous co-mingled material (also added by PCI). The soil was removed and incinerated at the Kleen-Harbors facility, in accordance with the approved T & D Plan.

The Kleen-Harbors laboratory performed two toxic characteristic leaching procedures (TCLPs) and two TOTALS tests upon receipt of the soil. The acceptance test revealed cadmium levels as follows:

TOTALS 1	12,000 PPM
TOTALS 2:	3,000 PPM
TCLP1:	321 PPM
TCLP 2	32 PPM

The regulatory level of cadmium is one (1) PPM. The shipping manifest provided by the generator [PCI] did NOT list cadmium as a component of the waste soil.

Discovery of cadmium in the soil (by Kleen-Harbors Laboratory) greatly increased the incineration time and resulted in a 15% increase in treatment costs. Innovative Waste Management, Inc. (IWM), UXB's waste management contractor, absorbed the additional costs for treatment and ultimately the \$5,000 that PCI had initially agreed to pay but later refused

None of the countless TCLP or TOTALS analytical tests performed of Dunn Field soil revealed any level of cadmium.

TDEC assumed the lead for investigation of the PCI incident, and UXB and USAESCH cooperated--providing all requested documents in a timely and accurate manner.

The State of Tennessee Director of Solid Waste Management called a meeting in Nashville, Tennessee, on August 9, 2001. Key personnel from the DLA, UXB, USAESCH, and ECBC attended the meeting to respond to concerns. A number of issues were satisfactorily resolved, including: sampling procedures, manifesting, selection of treatment methods, and toxicity of mustard degradation by-products. TDEC requested a health risk assessment on soil sent to PCI from Dunn Field., to include an unquestionable conclusion on its hazards to human health. DLA tasked USAESCH with providing the research document as soon as possible. This document concluded that given the documented constituents and concentrations, the soil did not pose a public health concern. The findings of this analysis is of vital concern for all, as treated soil from twelve 20-cubic yard roll offs were placed in the BFI Subtitle D Landfill in Millington, TN.

The U. S. Army Center for Health Promotion and Preventative Medicine (USACHPPM) provided the risk assessment on soil sent to PCI for treatment. A copy of this hazard analysis is provided as Appendix P, Health Risk Assessment of Exposure to three Mustard degradation products in soils at Dunn Field, Memphis Depot.

A comprehensive soil data table was composed, at TDEC's request, to reveal chemical composition, treatment, and final disposition of soil sent to PCI. This table is provided in Appendix Q, PCI Soil Data Table.

Table 16: Soil Transported to PCI

Waste profile #203864 HTW soil w/ lead and arsenic only. No CWM or degradation by-products of CWM. The receiving facility was PCI (Pollution Control Industries) Memphis, TN. Note: This soil was micro-encapsulated (non-leachable form), delisted, and placed in a RCRA Subtitle D Landfill owned and operated by BWI in Millington, Tennessee.

Manifest

01706-26Oct00, #01707-27Oct00, #01708A-27Oct00, #01709-30Oct00, #01710-30Oct00, #01711-31Oct00.
end of shipments of profile#203864.

Waste profile#206154: Non hazardous/Non-regulated soil & debris, no HTW, no CWM, no degradation of CWM, transported to PCI Memphis, TN. Note: This soil was placed in a RCRA Subtitle D Landfill near Memphis.

Manifest

#12600B-07Dec00, #12601-07Dec00, #12700-08Dec00, #12121-12Dec00, #12122-12Dec00, #12120-12Dec00, #12123-15Dec00, #12701-15Dec00, #12141-15Dec00, #12140C-22Dec00.
End profile#206154.

Profile#209401: degradation soil & debris, no CWM & only containing, 1,4-thioxane, 1,4-dithiane & thiodiglycol which is not a USEPA "Hazardous Waste" per 40CFR 261.3 was shipped to PCI Memphis, TN. Note: This soil was treated by the stabilization/fixation treatment process and placed in a RCRA Subtitle D Landfill.

Manifest

#02061A-18Jan01, #02062-19Jan01, #02063-22Jan01, #02064-22Jan01, #02065-22Jan01, #92066-22Jan01, #02067-23Jan01, #02068-23Jan01, #02069-23Jan01, #02070-23Jan01, #02071-24Jan01, #02072-24Jan01, #02073-24Jan01, #02074-24Jan01, #02075-25Jan01, #02099-25Jan01.
End of profile#209401.

Each manifest represents approximately 20-cubic yards of soil. Most of the roll-offs contained far less than full capacity.

2.8.4.2 Worker's Complaint on September 15, 2000

Three UXB workers were inside the VCS at Site 24-A, where they were investigating bomb casings for the presence of explosives. They were wearing the Level D PPE, in accordance with the initially approved Site Safety Submission.

On September 15, 2000, these three workers complained of dizziness, nausea, and sinus irritation after inspecting bomb casings. The on-site EMT team immediately placed them on oxygen. The symptoms diminished after receiving oxygen for 15 minutes, and workers requested to return to work. The Project Manager, in concert with the USAESCH Safety Specialist, directed the three workers be transported to the Regional Medical Center for observation. Airborne CWA monitoring equipment did not indicate a release of a CWA and the soil test confirmed that CWA was not present. The four-gas monitor did not reveal the atmospheric presence of flammable gases above the LEL, high levels of carbon monoxide/hydrogen sulfide, or low levels of oxygen.. Soil extraction tests did reveal small quantities (800 PPB) of Thiodiglycol (TDG).

The workers' symptoms were consistent with TDG exposure -- TDG is non-toxic and not cumulative in the body. The attending physician stated that exposure to TDG has no prolonged health affects -- it produces acute irritating affects, but exposure is not a chronic health hazard.

Regional Medical Center physicians analyzed the medical tests and concluded that the symptoms were not the result of CWA exposure. The three workers returned to the site to continue working, without restriction.

Subsequent to this event, workers investigating bomb casings for the presence of explosives in the VCS were required to wear Modified Level B PPE.

3 DOCUMENTATION

The Command Post Supervisor maintained written records of all project events and a VCS Entry Record. All intrusive work performed inside the VCS was videotaped and retained as a matter of record. Still photographs were taken throughout the project. The following paragraphs describe project management records.

3.1 Command Post Log

This log details all significant events occurring throughout the investigation phase of the project. A copy of command post log entries is provide in Appendix G.

3.2 VCS Entry Record

The Command Post Supervisor maintained a VCS Entry Log to document:

- Name of Employee
- PPE worn inside the VCS
- Date of VCS entry
- Time of VCS entry
- Time of exiting the VCS
- Total Time Inside VCS
- CWM Exposure, if any

Record entries were made each time an employee entered the VCS. These forms shall be retained in archived project records file.

3.3 Photo Documentation

The color photographs in Appendix H illustrate the operations conducted on the project and some of the anomalies encountered.

3.4 Video Tape

A narrated 120-minute videotape is provided in Appendix I. The videotape describes all of the major tasks of the project.

4 FINANCIAL BREAKDOWN

The financial breakdown is included in Appendix J. It reflects time and materials tasks only, and includes the following tasks:

Total for all Areas

Task 1	Site Visit/Work Plan
Task 2	Safety Submission
Task 3	Brush Clearing
Task 4	Intrusive Investigation -- Total Intrusive Investigation -- Site 1 Intrusive Investigation -- Site 24-A Intrusive Investigation -- Site 24-B
Task 5	Field Monitoring -- Total Field Monitoring -- Site 1 Field Monitoring -- Site 24-A Field Monitoring -- Site 24-B
Task 6	Investigative Waste -- Total Investigative Waste -- Site 1 Investigative Waste -- Site 24-A Investigative Waste -- Site 24-B
Task 7	Process Scrap -- Total Process Scrap -- Site 1 Process Scrap -- Site 24-A Process Scrap -- Site 24-B
Task 8	UXO Disposal -- Total UXO Disposal -- Site 1 UXO Disposal -- Site 24-A UXO Disposal -- Site 24-B
Task 9	Engineering Controls -- Total Engineering Controls -- Site 1 Engineering Controls -- Site 24-A Engineering Controls -- Site 24-B
Task 10	Meetings
Task 11	Video Tape
Task 12	Project Management
Task 13	Engineering Report

5 SUMMARY

5.1 Equipment Performance

All equipment performed exceedingly well. The use of mine-X converters on excavation equipment proved effective in preventing false MINICAM alarms due to diesel exhaust.

5.2 Site 1 (Phases I and II) - Results

- Discovered no intact CAIS.
- Discovered no CWM contaminated soil.
- Recovered a number of broken non-CWM related glass containers. All fragments were negative for CWM.
- Excavated approximately 898 cubic yards of soil— 715 cubic yards in Phase I; 183 cubic yards in Phase II
- Removed 80 cubic yards of soil containing foreign debris
- Removed 100 cubic yards of HTRW contaminated soil
- Removed 165 gallons of HTRW contaminated IDW water (chloroform contaminated)
- No airborne contaminants were released
- Production rate ranged from 5.71 cubic yards to 19.5 cubic yards per 10-hour workday. Production rate includes: excavation, sifting, sampling, equipment maintenance, staging, and soil containment. Direct correlation between production rates and heat stress conditions.

5.3 Site 24-A - Results

- Recovered 29 German mustard bomb casings; The mustard agent filler from these bomb casings was neutralized in 1946 at Site 24-B. The bomb casings were placed in a pit (Site 24-A) containing a decontamination solution and were surface decontaminated (weight: approximately 6,725 lbs.).
- Recovered and disposed of off-site by incineration, two burster tubes suspected of containing 2.75 lbs. of TNT each
- Recovered and removed STB drums and railroad rails
- Removed 260 cubic yards of soil containing foreign debris
- Removed 60 cubic yards of HTRW contaminated soil
- Removed 900 cubic yards of soil contaminated with mustard degradation by-products
- Removed 935 gallons of HTRW contaminated IDW water
- Discharged 550 gallons of uncontaminated water into the Memphis Sewer System
- Removed 5.5 lbs of TNT (suspected live burster tubes)
- No airborne contaminants were released within engineering controls or to the open air.

5.4 Site 24-B - Results

- Removed 548 cubic yards of soil containing foreign debris
- Removed 14 cubic yards of soil contaminated with mustard degradation by-product
- Removed 19 cubic yards of soil contaminated with mustard
- Removed 1,760 gallons of HTRW contaminated IDW water – all water was transported for treatment and/or disposal
- Removed 496 gallons of mustard degradation by-product contaminated waste water
- Removed 265 gallons of mustard contaminated waste water
- Removed non-ordnance related scrap, including: construction debris (concrete with rebar)
- No airborne contaminants were released within engineering controls or to the open air.

5.5 Schedule Summary

September 30, 1998	Delivery Order awarded
March 13, 2000	VCS Setup Began
March 18, 2000	VCS Setup Completed
March 21, 2000	Media Day
April 17 – 21, 2000	Pre-Operational Inspection
May 3, 2000	Authorization to commence with on-site activities
May 4, 2000	Site 1 operations began
August 4, 2000	Site 1 operations completed (Phases I and II)
August 28, 2000	Site 24-A activities began
November 17, 2000	Site 24-A activities completed
November 29, 2000	Site 24-B activities commenced
March 26, 2001	Site 24-B activities completed
May 9, 2001	Secured and departed site
June 30, 2001	Draft Final Removal Report submitted
December 12, 2001	Final Removal Report submitted

5.6 Summary of Health and Safety Activities

UXB developed a Site-Specific Safety and Health Plan (SSHP) to address the health and safety hazards that were specific to the Dunn Field Project. The SSHP incorporated Occupational Safety and Health Administration (OSHA) and American Conference of Government Industrial Hygienists (ACGIH) guidelines, as well as accepted industry wide workplace practices. The SSHP was reviewed by a Certified Industrial Hygienist, who was available for consultation if any conditions arose that were outside the scope of the SSHP. The SSHP is located in the USAESCH approved Final Safety Submission.

There was only one reportable accident, and it occurred on October 19, 2000. The physician's direction for restricted duty qualifies this accident as reportable. There was no lost time and no property damage. To summarize: When placing sandbags along the skirt of the VCS (to form a vapor barrier along the ground surface), Mr. Satko experienced back pain. He did not report this incident until the afternoon of October 20, 2000 (24-hours later). Mr. Satko was taken to Saint Francis Hospital, examined, and authorized to return to work on a limited duty basis (no lifting more than 10 pounds). A copy of ENG FORM 3394 is located in Appendix K. No 948 was associated with this reportable accident.

USAESCH Safety Specialist issued the following safety-related USAESCH 948s (Table 17):

Table 17: 948 Safety Issues

Date	Incident	Corrective Action
2/6/00	Individual approached front-end loader while excavator continued to load front-end loader bucket.	Team #2 was counseled to stop equipment prior to approaching
5/24/00	Post (bollard) protecting monitoring well was hit by the forklift driver who was transporting air bottles. Post was dislodged; no damage to forklift.	All personnel were counseled to promptly report all accidents, regardless of severity. Bollard was replaced.
6/26/00	Forklift backed into parked van. No personal injuries.	Personnel were counseled to have ground guide present while operating heavy equipment. Remedial training conducted to instill safety practices while using heavy equipment
6/22/00	Number of personnel caused undue hardship on UXB site personnel. CWM operations required more personnel than the quantity specified in the work plan.	Additional personnel were mobilized
7/10/00	Operator of extended reach forklift did not have a ground guide.	This was a second offense. A safety briefing was convened for all personnel on the requirement to have a ground guide present while operating heavy equipment.
10/24/00	John Fox (employee) complained of headache after dumping a load of soil. Medics checked him – no reason noted for headache other than dust.	All personnel were directed to wear full face mask with a pre-filter and organic vapor cartridge when staging soil.
10/25/00	John Fox (employee) had elevated heart rate (146 bpm). Referred to Methodist Hospital for observation. Heart rate dropped to 90 before departing site	Mr. Fox has a pre-employment medical condition that causes unexplained elevated heart rates. Mr. Fox received approval from a physical to work in a CWM environment. Mr. Fox was closely monitored for any signs of elevated heart rate
11/27/00	USAESCH provided documentation on the required mask and filters to be used on site to the SUXOS.	The SUXOS ensured the masks used on-site were in compliance with the USAESCH required PPE mask and cartridges.

Exposure data is listed in Table 18.

Table 18: Exposure Data

Man-Hours Worked On-Site	32,397
Employees On-Site	12
Accidents On-Site	0
Lost Work Days Due to Accidents	0
Vehicles On-Site	5
Vehicular Miles Driven	58,119

5.7 Summary of Quality Control

A UXB Quality Control Specialist was on-site during every phase of the delivery order, and used the following quality control process. The QC Specialist:

- performed inspections and submitted Daily QCI Reports, for specific tasks inspected on a daily, weekly, and monthly basis (Appendix L). These reports summarize QC results.
- submitted soil/water samples to the UXB chemist for verification of sampling results performed off-site.
- met with UXB's Corporate Director of Quality on two occasions for an on-site overview and assessment of UXB's quality control processes.
- verified that hazardous/non-hazardous waste had a manifest and was labeled/placarded in accordance with the manifest prior to loading and shipment for treatment and/or disposal.

5.7.1 Chemical Data Quality

UXB's Chemical Data Quality Management Plan (CDQMP) was prepared in accordance with the U.S. Army Corps of Engineers, Huntsville District guidance for Environmental Data Quality Management, and the EPA's requirements for Quality Assurance Project Plans for Environmental Data Operations (EPA QAIR-5, 1994). It established an effective and efficient system to ensure appropriate and consistent controls are implemented, and that data are precise, accurate, representative, complete, comparable, legally defensible, and of sufficient quality to meet intended use.

Data quality was evaluated relative to data quality objectives (DQO), which qualitatively and quantitatively specified the field & laboratory data quality necessary to support specific decisions/ regulatory actions. DQO described the data needed, why the data was needed, and how the data was to be used. DQO established numeric limits for the data to allow the user to determine whether the data collected are of sufficient quality for their intended use. Quality assurance objectives developed and implemented sample collection, sample handling, and analytical procedures that provided data to fulfill the project DQO.

The CDQMP identified individuals/organizations participating in the project and defined their specific roles and responsibilities as they related to the data quality management function. It described laboratory analytical methods to be used for the acquisition of chemical data during the project, and included relevant aspects of laboratory procedures (sample preparation/extraction procedures, instrumentation, calibration procedures, preventative maintenance, method/instrument detection limits, and practical quantitation limits). It discussed precision, accuracy, completeness, and representative sampling. It defined methods for

assuring data quality by providing checks and balances for field and laboratory operations. Methods include: duplicate samples; field, method, and instrument blanks, Laboratory Control Samples; Matrix Spikes and Matrix Spike Duplicates.

Data validation, based on functional guidelines (EPA, 1994), was performed by the UXB Project Chemist. The validity of the field and analytical data was evaluated using the Precision, Accuracy, Representativeness, Completeness, and Comparability (PARCC) parameters to determine whether the data quality objectives were met (compared QC sample results and standard procedures with acceptance criteria). The Project Chemist also verified that all required analysis were complete. The project chemist:

- Reviewed each sample.
- Evaluated the sample results against the Region 9 Preliminary Remediation Goals (PRGs) 1999 criterion for Industrial Soils (as modified per agreement) which can be found on the Web at <http://www.epa.gov/region09/waste/sfund/prg/> and 40 CFR 261.24 Table 1, which can be found at <http://frwebgate.access.gpo.gov/>. Modifications to the criterion included adjusting the following chemical's acceptable limits to the following concentrations:

Aluminum	24,000 mg/kg
Antimony	7 mg/kg
Arsenic	20 mg/kg
Dioxin	10 mg/kg
Iron	37,000 mg/kg
Lead	400 mg/kg
Manganese	1,300 mg/kg

- Examined the case narrative for each analysis.
- For any analysis that indicated analytical problems, investigated the problem in depth and determined if the data included in the analysis was compromised or were acceptable.
- Compared duplicate samples, blind duplicate samples, and blanks to assure that reproducibility of samples was achieved.
- Conducted field training exercises for Dunn Field personnel involved with sampling to assure that the proper techniques were performed to prevent contamination and assure sample integrity and that all samples were representative of the original material.
- Provided written documentation of each sample to indicate whether the material and analysis was acceptable.

Analytical Quality Control documents are located in Appendix M. The Quality Control Summary Report is located in Appendix N.

5.8 Summary of Public Affairs

Public affairs were handled by DLA through Frontline, a contracted public affairs company. UXB did not disclose any data generated under this delivery order. UXB referred all inquiries to USAESCH.

USAESCH and UXB participated in public meetings and civil inquiries, as requested by the Memphis Caretaker Department.

A Media Day was scheduled on March 21, 2000 to inform the public and media of project, protective measures employed to protect the public and workers; objectives and methods to achieve the desired results; and convey a willingness to share all aspects of the project with interested groups and local residents

Weekly public meetings were held to inform the general public of work progress and to address any concerns. On-site meetings were suspended the last three months of the project, due to lack of public response. The meetings were held at Memphis Depot, Bldg 144, as requested in the latter weeks of the project.

Restoration Advisory Board (RAB) meetings were held monthly. USAESCH and UXB attended these meetings to address project-specific concerns of the general public.

5.9 Investigation/Removal Summary

Table 19 summarizes all of the investigative derived wastes from this project.

Table 19: Summary of Investigative Derived Waste

Summary of Investigative Derived Waste					
<i>Item Ref</i>	<i>Waste Category</i>	<i>Qty @ Site 1</i>	<i>Qty @ Site 24-A</i>	<i>Qty @ Site 24-B</i>	<i>Total</i>
1	Soil Containing Foreign Debris	80 cu yds	260 cu yds.	548 cu yds.	888 cu. yds.
2	HTRW Contaminated Soil	100 cu yds	60 cu yds.	0	160 cu. yds.
3	Mustard Degradation By-Product Contaminated Soil	0	900 cu yds.	14 cu. yds.	914 cu. yds.
4	Mustard Contaminated Soil	0	0	19 cu yds.	19 cu. yds
5	3X Material	0	29 bomb casings, STB drums (e g all metallic material from pit (6,725 lbs.))	0	29 bomb casings and 6,725 lbs. of metallic 3X material
6	HTRW Contaminated Soil	165 (Chloroform Contaminated)	935 U.S Gallons (550 gallons of the 935 were approved for discharge into the Memphis Sewer System)	1,760 U.S Gallons (no IDW water was discharged into the Memphis sewer system from this site)	2,860 U.S. Gallons
7	Mustard Degradation By-Product Contaminated Water	0	0	496 U.S. Gallons	496 U.S. Gallons
8	Mustard Contaminated Waste Water	0	0	265 U.S Gallons	265 U.S. Gallons
9	Ordnance and Explosives	0	5.5 lbs. TNT (two suspected live burster tubes)	0	5.5 lbs. TNT

6 RECOMMENDATIONS

1. Recommend review of analysis results to determine further on-site HTRW investigations.

7 LESSONS LEARNED

Issue: Project Staffing should include positions unique to CWM projects. This project was initially designed without the following critical field positions; these positions were added to the project during on-site operations:

- Command Post Director -- to direct operations inside the VCS.
- Air King -- to maintain constant surveillance of air supply to personnel working inside the VCS.
- Logistics Manager -- to perform maintenance on PPE and maintain a ready stock of essential supplies, equipment, air banks and to maintain an accurate accounting for GFE.
- Waste Management Supervisor -- to track all samples, maintain sample audit trail and supervise labeling and containment of waste material.

Lesson Learned: Include these positions at initial mobilization to minimize disruptions and maximize production.

Issue: Management of hazardous waste was a major concern throughout the project. A number of unanticipated waste streams were encountered. Management of these waste streams required guidance from personnel disciplined in RCRA, CERCLA, and DOT regulatory compliance. The project could have proceeded uneventfully had complete guidelines been detailed in the Site Safety Submission.

Lesson Learned: Identify all potential waste streams that may be encountered at the site and include specific written guidelines to characterize, profile, manifest, contain, transport, treat (if applicable) and dispose of each category. Projects involving large quantities of waste products should have a trained and certified waste management supervisor assigned. Moreover, state, federal, and local waste management authorities must be well informed of site waste management practices. Written waste management procedures should be provided to applicable waste management authorities for review and concurrence.

Appendix A:**STATEMENT OF WORK**

**Chemical Warfare Materiel
Investigation/Removal
Action At
Defense Depot Memphis
Tennessee (DDMT)**

STATEMENT OF WORK
CHEMICAL WARFARE MATERIEL
INVESTIGATION/REMOVAL ACTION
DUNN FIELD
DEFENSE DEPOT MEMPHIS
TENNESSEE (DDMT)

1.0 **BACKGROUND and GENERAL STATEMENT OF WORK.** The work required under this Statement of Work (SOW) falls under the Base Realignment and Closure (BRAC). Chemical Warfare Materiel (CWM) is suspected to exist on this property formerly owned by the Department of the Army and currently owned by the Department of Defense. The project site is Dunn Field, Defense Depot Memphis Tennessee (DDMT).

1.0.1 Ordnance and explosives (QE) and CWM are a safety hazard and constitute a hazard to the public and the environment. These actions will be performed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); the National Priority List (NPL); the Federal Facilities Agreement (FFA) between DDMT, Environmental Protection Agency (EPA), and the State of Tennessee; and, the National Contingency Plan (NCP). For any actions on site, administrative requirements of Federal, State, or Local permits are not required, but the substantive permit requirements shall be fulfilled. The provisions of 29 CFR 1910.120 shall apply to all actions taken at this site.

1.0.2 This site is a suspected CWM site, possibly containing German WWII mustard-filled bombs and Chemical Agent

Identification Sets (CAIS). CAIS falls under the category of CWM.

1.03 The contractor shall prepare and coordinate with various government agencies the Work Plan, Site Safety and Health Plan (SSHP), and other plans as identified in this Scope of Work. The contractor shall also prepare: (1) the Department of Defense (DOD) Safety Submission (SS) for this site; (2) the site for intrusive/removal action; and, (3) be required to provide necessary engineering controls prior to intrusive actions. The contractor shall perform most initial intrusive work. Technical Escort Unit (TEU) of the Chemical and Biological Defense Command (CBDCOM) shall assist, as required, the contractor with initial excavation. TEU shall perform all removal, assessment, sampling, packaging and transport to the interim holding facilities (IHF) of determined or suspected CWM. TEU shall be on-site to assess CAIS and chemical warfare ordnance. If CWM is found during field operations, TEU shall control the site, and the contractor shall support TEU and notify the Corps of Engineers Huntsville Center (CEHNC) on-site Safety Specialist or contracting officer. If an explosive chemical munition is found, the contractor may be directed to continue operations in another location or suspend operations until further notice upon the direction of the CEHNC safety specialist or contracting officer. The contractor shall support TEU during TEU's intrusive excavations for removal, packaging and transport of non-explosive CWM. The contractor shall also remove and destroy conventional unexploded ordnance (UXO). Program Manager-Nonstockpile (PMNS) is responsible for transporting CWM from the site IHFs and its disposition. TEU shall conduct field monitoring for agent, and Edgewood Research, Development, and Engineering Center (ERDEC) of CBDCOM shall analyze samples for agent and related byproducts (i.e., agent

degradation products and decontamination waste) by using ERDEC's on-site mobile laboratory. The contractor is responsible for sampling, characterizing, excavating, containerizing, documenting, transporting and disposal at an approved RCRA treatment, storage and disposal (TSD) facility material (i.e. soil and scrap, and investigative waste (IW)) contaminated by agent. The contractor shall characterize, transport and dispose solid and hazardous waste (including soil and scrap) not contaminated by agent, and restore the site. The contractor shall prepare an Engineering Report, documenting all work undertaken during this project. The contractor shall maintain a detailed accounting of all ordnance encountered. This accounting shall include the amounts of ordnance, identification, condition, depth located, disposition and location/mapping, and shall be part of the Engineering Report.

1.1 SITE DESCRIPTION.

1.1.1 General. The Defense Depot Memphis Tennessee is located within the city limits of Memphis, Tennessee. The Depot is on the south side of the town on Airways Road. It is two miles northwest of the Memphis International Airport. The Depot **is** still actively used by the Department of Defense, operated by the Defense Logistics Agency (DLA) and under the control of the Defense Distribution Region East (DDRE). The depot is undergoing Base Realignment and Closure (BRAC) activities.

1

1.1.2 Main Depot Area. No evidence of burial or destruction of conventional ordnance or chemical warfare materials on the main depot can be found. The pistol range has been removed. In 1946 the area where the boxcars containing German mustard bombs, which leaked mustard onto the ground, was decontaminated and tested and no mustard was detected.

1.1.3 Dunn Field All records indicate that only the Dunn Field Area was used to destroy or bury conventional ordnance and CWM. The first known destruction of CWM was in 1946 in Operable Unit 1 (OU-1, unnumbered site, and also shown in the Archive Search Report (ASR), Reference 8.32, as Area A) with the neutralization and destruction of the German Mustard Bombs. The last known disposal of CWM is the burial of CAIS in 1955 or 1956, in OU-1, Site #1 (also shown in the ASR as Area B). Between 1946 and 1956, other chemicals associated with the Chemical Warfare Service were also buried. These include Impregnite (both CC-2 and XXCC-3), used for impregnating clothing against chemical agent and Decontamination Agent, Non-Corrosive (DANC) (consisting of RH195 and Acetylene Tetrachloride). In addition, food stocks (rations), acids (Nitric, Sulphuric, Hydrochloric, and Acetic), paints, herbicides, and medical waste were also destroyed or buried in pits. Conventional ordnance war trophies (ordnance souvenirs brought back from overseas) were also destroyed in the Dunn Field Area following World War II.

1.1.3.1 Dunn Field, Operable Unit 1 (OU-1, ASR Area A), measures approximately 200 feet wide by 1350 feet long and approximately 6-1/2 acres. In July 1946, a rail shipment of 250 kg and 500 kg sulphur-mustard-filled German bombs, en route from Mobile, AL to Pine Bluff, AR, was diverted to DDMT due to some of the bombs leaking and contaminating the rail line. The leaking bombs (24 -500 kg and 5 -250 kg) were drained at DDMT by shooting into the bomb casing, draining the mustard into a slurry pit (40 feet long by 8 feet wide by 12 feet deep), and destroying the empty bomb casings by detonation (the 500 kg bombs did not have explosives, the 250 kg bombs did have an explosive burster) Pages 5 through 10 of the ASR mention an old cloth drawing of

Dunn Field was found and was barely readable; the outline of a trench was marked 'Mustard Gas.'

1.1.3.2 Dunn Field, Operable Unit 1 (OU-1, ASR Area B), Site #1, measures approximately 200 feet wide by 1200 feet long and approximately 5-1/2 acres. In 1952-1953 and again in 1955-1956, Chemical Agent Identification Kits were buried (kit type unknown). Pages 5 through 11 of the ASR state that the CAIS sets in wooden boxes were put into the pits intact and covered up. Although the exact kit type is unknown, typically CAIS included vials containing agents listed in the following table, but additional CAIS agents may also be present.

Agent Abbr.	Agent Name and Description	Type of Agent
H or HD	Distilled Mustard (Sulphur)	Blister Agent
L or M-1	Lewisite	Blister Agent Choking Agent
PS	Chloropicrin or Tricloronitromethane	
CG	Phosgene	Choking Agent
CN	Chloroacetophenone or Chloromethyl Phenyl ketone	Tear Agent
DM	Adamsite or Diphenylaminochloroarsine	Vomiting Agent

2.0 OBJECTIVE. The objective is for the contractor, in conjunction with CBDCOM, to investigate and remove German Mustard Bombs, CAIS and any other CWM contamination, and to investigate and destroy conventional UXO at the Dunn Field Sites located at DDMT.

3.0 TASKS

3.1 (TASK 1) SITE VISIT. PREPARE WORK PLANS (WP), and SITE SAFETY AND HEALTH PLAN (SSHP).

3.1.1 The contractor shall prepare and submit a Work Plan. The Work Plan shall describe in detail the site background and history, investigation objectives, all proposed investigative activities, sampling techniques, personnel protective equipment (PPE), monitoring equipment, procedures, personnel, and schedule. A site visit is authorized to assist in preparing the Work Plan. The site visit team shall not exceed three persons, and shall include one Senior UXO Supervisor. The site visit shall be coordinated with the Contracting Officer (CO) 10 days prior to arriving on site. An abbreviated SSHP shall be prepared in accordance with (IAW) 29 CFR 1910.120 and 29 CFR 1910.134 for the site visit. An example of an abbreviated SSHP can be obtained from the CEHNC Safety Office. The abbreviated SSHP shall be forwarded to the CEHNC contracting officer for approval prior to the site visit.

3.1.2 Health and Safety Program (HSP) The contractor shall develop and maintain a Health and Safety Program in compliance with the requirements of OSHA standard 29 CFR 1910.120(b) (1) through (b) (4). Written certification that the HSP has been developed and implemented shall be submitted to the Contracting Officer, and the plans shall be made available upon request. The contractor shall develop a Site Safety and Health Plan IAW the requirements of Paragraph 5.0 of this SOW. The SSHP shall be submitted to the Contracting Officer for review and approval prior to starting any of the field work described in this SOW. All work shall be performed IAW the approved plan and this SOW.

3.1.3 Intrusive Excavation Plan. The contractor, in conjunction

with TEU, shall prepare and submit an Intrusive Excavation Plan. This portion of the Work Plan shall propose methods for excavating as well as discuss equipment, materials, personnel (types and level of staffing), and procedures for intrusive excavation. The contractor and TEU will work as a team mutually supporting each other during intrusive excavations. The level of effort required to manage the DDMT project will be coordinated with TEU and defined in the Work Plan. For example, the contractor will perform most of the initial intrusive work, and TEU will provide support based on what level of effort is required.

3.1.3.1 Specific contractor responsibilities are:

The contractor shall remove and destroy conventional UXO IAW the Conventional UXO Disposal Plan.

The contractor shall maintain a detailed accounting of all ordnance encountered. This accounting shall include the amounts of ordnance, identification, condition, depth located, disposition and location/mapping, and shall be part of the Engineering Report.

The contractor, if an explosive chemical munition is found, may be directed by the CEHNC Safety Specialist to suspend operations until further notice. (TEU will step in and identify/characterize the contents of the items of CWM.)

The contractor, with TEU support, shall safely excavate suspect CWM and debris. Excavated soil shall be placed in roll-off containers for its characterization.

The contractor shall identify soils contaminated with agent. These soils shall be containerized, manifested, transported, and disposed of by the contractor in accordance with local, state,

and federal laws and regulations.

The contractor shall remove from the site glassware, containers, and soils identified as not containing agent, and dispose of them as HTW or solid waste. Soils identified as clean shall be used to fill excavated areas that are identified clean of agent.

The contractor shall be responsible for site grading and seeding of any disturbed areas following the removal activities. Specific TEU responsibilities are:

TEU shall be on site to assess CAIS kits and suspect chemical warfare ordnance.

If CWM items are found, TEU shall control the site, and the contractor shall support TEU.

TEU will over pack and transport to an interim holding facility any glassware, containers, and munitions identified or suspected as containing CWM. (The contractor will support TEU as necessary in these activities.)

3.1.4 Work, Data, and Cost Management Plan (WDCMP). The contractor shall prepare and submit a WDCMP which describes how the work will be managed and accomplished. The WDCMP shall contain a schedule for the accomplishing the tasks. The schedule shall contain milestones for delivery of all deliverables and associated costs, showing the components in their relative chronological positions, and state the intervals between milestones in terms of working days following the previous events. More detailed information in the WDCMP shall also consist of the organization structure, the assignment of functions, duties and responsibilities, and functional relationships among

organizational elements that will participate in accomplishing the tasks.

3.1.5 Quality Control (QC) Plan. Items addressed in the QC Plan should include as a minimum: testing and calibrating equipment; performing and documenting QC field inspections; monitoring proper functioning of all electronic equipment; and, ordnance and explosive (OE) identification. In addition, a QC Plan should be incorporated into the Sampling Plan and shall include chain-of-custody procedures. All QC checks shall be documented and audit trails established for each QC function and those audits available to the on-site COE representative. The contractor shall have a qualified geologist during field activities to determine that undisturbed soil has been encountered. This activity shall be initiated after intrusive activities and prior to backfilling the excavation. Some audits expected to be performed are: equipment calibration, property accountability, UXO-related tasks, equipment operator, PPE, sampling and analytical audits. The QCP will conform to DID OT-005 of the contractor's basic contract.

3.1.6 Site-Specific Environmental Protection Plan. The contractor shall address those measures to be taken to protect against further contamination and environmental damage that may result from the contractor's work.

3.1.7 Property Equipment Plan (PEP). The contractor, coordinating with TEU, shall prepare and submit a detailed PEP describing the equipment to be employed to perform all necessary operations. The PEP shall describe and quantify both field equipment (such as site trailers, backhoes, trucks, magnetometers, structures, etc.); office equipment (such as computers/printers, fax, copier, radios, etc.); and consumable

supplies (both office and field) intended to be used. The PEP shall describe the source and rental/acquisition costs for all field and office equipment, and the PEP must indicate that the vendor with the lowest price quote was selected, or justify the use of an other vendor. The contractor shall indicate in the PEP when rental costs exceed acquisition cost for a particular piece of equipment over the life of the project. In these instances, the CO may direct the contractor to purchase that equipment. After CO approval of the Work Plan/Property Equipment Plan, additional field/office equipment and consumable supplies may not be rented or acquired in excess of \$2,000.00 without CO approval.

3.1.8 PM Non-Stockpile Plans. The contractor shall, on concurrence with the Contracting Officer, be prepared to assist PMNS as needed in developing plans for the following tasks.

3.1.8.1 Recovered Chemical Warfare Materiel Interim Holding Facility Plan.

3.1.8.2 Recovered Chemical Warfare Materiel Transportation Plan.

3.1.8.3 Recovered Chemical Warfare Materiel Disposal Plan.

3.1.9 Scrap Monitoring and Disposal Plan. The contractor, in conjunction with CBDCOM, shall develop and propose a plan for monitoring and disposing of all recovered scrap from intrusive operations in CWM areas. This plan shall consider requirements for monitoring, shall show alternatives for scrap disposal, and shall propose the safest and most cost-effective methods that will be followed. Items determined to be from CWM operations shall be placed by the contractor in a sealed box or container and heated to 70 degrees F. Head space samples shall be collected and analyzed by CBDCOM. If the item contains any solid or liquid

residue, a sample shall be collected by the contractor and analyzed in accordance with the Chemical Data, Laboratory, and Field Work Sampling Plan. A soil sample shall be collected by the contractor from the precise location where the item was recovered and analyzed accordingly. If results of the air, soil, and residue sampling indicate no agent contamination, the contractor shall make provisions for disposal of these items. For scrap that is agent contaminated, the contractor shall recommend the Hazardous and Toxic Waste receiver, packaging and transport methodology. The contractor shall furnish the following statement for scrap released as non-hazardous: "I certify that the property listed hereon has been inspected by me, and to the best of my knowledge and belief, contains no items of a dangerous nature." The Senior UXO Supervisor shall sign the certificate.

3.1.10 Medical Training and Support Plan. This plan shall be provided by the Government.

3.1.11 Protective Action Plan. The protective action plan is prepared by the Corps of Engineers. The development of this plan requires input and coordination with the contractor, DDMT, CEHNC, CBDCOM, and PMNS. This plan shall include, but is not limited to, procedures used to protect civilian personnel against on-site contaminants, including evacuation procedures for civilian personnel, reimbursement of expenses for evacuees, the Maximum Credible Event (MCE), the down wind hazard calculations, and the No Significant Effects (NOSE) distance. The contractor shall assist, as required by the Corps of Engineers in the development of this plan.

3.1.12 Chemical Data, Laboratory and Field Work Sampling Plan. The contractor shall describe methods and equipment for, and frequency and quantities of, soil sampling by the contractor.

This plan shall also include the number of samples of each matrix to be taken, the specific chemical parameters to be analyzed for, the standard EPA SW 846 methods or Government-approved methods for agent analysis, and the frequency of analyses to be performed. Composite samples (taken by the contractor) from the excavated soil shall also be analyzed for disposal. In the absence of analytical methods for agent related byproducts, the contractor shall identify and recommend analytical methods used in the commercial chemical laboratories and shall include the associated detection limits of the matrix. A complete copy of the agent and related-byproducts shall be included in the Work Plan with the associated detection limits. ERDEC shall analyze for agent and related-byproducts with ERDEC's on-site mobile laboratory. ERDEC will provide on-site screening of samples prior to shipping the samples from the site. Environmental samples, split from the original sample, shall be held pending ERDEC on-site analysis for agent and related byproducts. Samples identified as not contaminated by agent shall be released by the contractor to a valid CEMRD laboratory for environmental analysis. For quality control purposes, 10 percent of the samples shall be split into an additional sample to be sent to an ERDEC certified or CEMRD environmental laboratory for confirmation.

3.1.13 Investigative Waste (IW) Plan. The contractor shall describe how investigative waste shall be handled at the site. The plan shall describe if the IW (i.e. agent contaminated media possibly with industrial chemicals, agent byproducts, and hazardous waste) must be containerized, type of containerization method, sampling and analytical strategy, acceptable disposal facilities, site storage and security, transportation, manifesting, and storage time limits. Regulatory acceptance of the IW Plan shall be obtained in writing prior to

contractor field mobilization.

3.1.14 Field Monitoring Plan.

3.1.14.1 The contractor shall coordinate with the CO, CEHNC, and CBDCOM, in determining the amount and type of monitoring equipment. The contractor shall coordinate with CBDCOM as to the placement and the number of monitoring devices for this Task Order. CBDCOM shall provide monitoring for agent during field operations. The contractor shall be responsible for continuous monitoring of all other hazards associated with the sites. The contractor may coordinate information requests with CBDCOM and CEHNC on hazards believed to be present. The contractor is responsible for monitoring of all industrial chemicals. Air monitoring results shall be used to determine the appropriateness of Personnel Protective Equipment and the need to upgrade/downgrade the levels of protection based on established action levels. When applicable, National Institute for occupational Safety and Health (NIOSH) approved sampling and analytical methods must be used. Monitoring chemical agents shall be in accordance with ERDEC protocols. Only laboratories participating and meeting the requirements of the American Industrial Hygiene Association Proficiency Analytical Testing Laboratory Accreditation programs shall conduct necessary analyses for chemicals other than agent. For chemicals other than agent, all information on monitoring shall be included in the SSHP.

3.1.14.2 The contractor, in conjunction with CBDCOM, shall take periodic soil samples, and then send these samples to the on-site laboratory. The contractor shall provide soil sampling equipment, containers and packaging as required. The

contractor shall coordinate with CBD COM for assistance in sampling and sample packaging for the QC samples. All sample locations shall be annotated for future reference. The contractor shall plot each sample location, the corresponding sample number, and the X, Y and Z (distance above or below natural ground) coordinates on the map as approved and discussed in the Work Plan.

3.1.14.3 The contractor shall include all monitoring information (both contractor and Government) into a table in the SSHP. The table shall include information on action levels, actions to be taken, monitoring frequency, by whom, etc.

3.1.15 Conventional UXO Disposal Plan. The contractor shall be responsible for the destruction of conventional UXO and in accordance with the Work Plan. The plan, coordinated with TEU, should include types of demolition material, method of securing the site, demolition notification to local emergency management, and other details required to conduct demolition operations.

3.1.15.1 The procedures used during disposal of conventional UXO shall comply with those covered in Reference 8.33. The contractor shall provide UXO personnel support, and only CEHNC approved UXO personnel shall perform UXO-related tasks.

3.1.15.2 Explosives Management Plan. The contractor shall prepare an Explosives Management Plan IAW DID OT-005 of the basic contract. A system shall account for all demolition materials expended in the disposal of conventional UXO. The source and handling of explosives shall be addressed.

3.1.16 Community Relations Plan. The contractor shall assist Mobile District as required to prepare a plan for community relations. Any already existing plan shall be utilized. The plan

shall be formulated in close consultation with the US Army Corps of Engineers, Mobile District, TEU, PMNS,DDMT, DLA and CEHNC public affairs personnel.

3.1.17 Site Mobilization/Demobilization and Support Plan.

The contractor shall prepare a plan that details mobilization/demobilization activities. These activities shall be those actions necessary to prepare the site for work prior to work crew arrival and those actions necessary to shut down the site at demobilization. Such activities shall include, but are not limited to, communications, power to site office(s), arrangement for office(s), sanitary requirements, and lodging arrangements.

3.2 (TASK 2) SAFETY SUBMISSION. (SS) As directed by CEHNC, the contractor shall compile, maintain, and submit the official SS for coordination and approval by the DA. The SS will consist of an Executive Summary, the Work Plan, a Site Safety and Health Plan, a Protective Action Plan, a Transportation Plan, an Interim Holding Facility Plan, Disposal Plan, a Technical Escort Unit Op-Plan, a Monitoring Plan, CWM Disposal Plan, and a Conventional UXO Disposal Plan. Though several of these documents are prepared by other agencies, the contractor shall be responsible for incorporating them into the SS, keeping all incorporated documents current, and preserving document control so that all copies remain identical throughout the life of this project.

3.3 (TASK 3) BRUSH CLEARING. The contractor shall perform brush clearing operations as required. Brush and vegetation will be cut and removed from the site as required to facilitate efficient and safe operations. Ground features necessarily altered to accomplish the mission shall be restored to their original state by the contractor.

3.4 (TASK 4) INTRUSIVE EXCAVATIONS.

3.4.1 The contractor and TEU shall excavate and screen soils IAW the approved Work Plan. TEU shall be on-site to assess CAIS and suspect CWM.

3.4.2 In the event a suspect chemical item is found, the contractor shall support TEU and notify the CEHNC on-site safety specialist or contracting officer. TEU shall take control of the area and assess the item. If an explosive chemical munition is found, the contractor may be directed to continue operations in another location or suspend operations until further notice upon the direction of the CEHNC safety specialist or contracting officer. If the item is CWM, TEU will remove, package and transport it to the IHF. The contractor shall support TEU during TEU's excavations for removal, packaging and transport of CWM.

3.4.3 The contractor shall be responsible for excavating all soil identified by soil sampling as contaminated with agent.

3.4.4 The contractor shall be responsible for screening debris, and for containerizing soils generated during intrusive investigations.

3.4.5 Agent contaminated media are the responsibility of the contractor to ensure that proper sampling, analysis (by ERDEC), containerization, labeling, manifesting, and transportation are conducted. DDMT shall identify a person responsible for the signing of the manifests.

3.4.6 The contractor shall be responsible for the identification of TSD facilities for the ultimate disposal of soils and debris contaminated with agent or hazardous waste.

3.4.7 The contractor shall be responsible for the coordination/disposition of all soils generated from excavation activities. Soil identified as containing agent shall be disposed of as hazardous waste. All soil identified as HTW shall be

removed and disposed by the contractor at an approved TSD facility. Site areas disturbed by field operations shall be restored, including backfilling excavations with clean soil, grading and reseeding, by the contractor.

3.5 (TASK 5) FIELD MONITORING.

3.5.1 The contractor shall coordinate with CBDCOM in determining the amount and type of monitoring equipment. CBDCOM shall provide monitoring of agent. The contractor shall be responsible for monitoring all other contaminants. The contractor may coordinate information requests on hazards believed present on site with CBDCOM. Air monitoring results shall be used to determine the appropriateness of Personnel Protective Equipment and the need to upgrade or downgrade the established action levels.

3.5.2 Chemical Analysis of Samples. Samples of soil and any other materials suspected of agent contamination shall be analyzed by ERDEC at the ERDEC mobile on-site laboratory for the presence of agent. Samples field-identified as containing agent shall immediately be handled as described in the approved Work Plan. Soil samples identified as not contaminated by agent shall be analyzed for HTW by the contractor.

3.5.3 The Government assumes that there will be a continuous sampling effort, including within the excavations, as work progresses for containers, soils, glassware, munitions, and debris recovered and exposed by excavation. Additional sampling events shall be conducted by the contractor at the Government's discretion. Excavated suspected agent contaminated materials and soil, and the soil underlying the removed suspected CWM will be sampled by the contractor and tested for agent presence by ERDEC.

3.5.4 Samples collected shall be analyzed by ERDEC's mobile laboratory for agent, and agent related byproducts. Other

environmental analytical parameters as the contractor shall propose to justify in the Work Plan shall be conducted by the contractor's environmental laboratory. One sample shall be collected, and split into a minimum of two samples, by the contractor at each proposed sample location or depth. One sample shall be analyzed by the on-site ERDEC laboratory for agent constituents/related products. The second sample shall be analyzed by the contractor's environmental laboratory for other Contaminants of Concern (COC) for health-based and land disposal requirements and ultimate disposal after the ERDEC mobile laboratory results indicate no ent. (This second sample shall be held in storage until the results from ERDEC are provided and declared agent free.) For approximately 10 percent of the sampling effort, a third sample all sent to a certified ERDEC or environmental laboratory for QA/QC purposes. The QA/QC samples shall be collected, monitored, packaged, and shipped by the contractor at the frequency as approved in the Work Plan.

3.5.5 EPA and state health-based standards for exposure the COC shall be used as a measure for defining the extent of ent or HTW contamination. Health-based exposure standards of the constituents of agent and related byproducts shall apply if compound specific standards are unavailable. If health-based standards are not available for the COC, land disposal contaminant level restrictions shall be applied to define the extent of the contamination.

3.5.6 The contractor shall electronically track a sample identification with the analytical results as soon as they become available. This electronic information shall identify sampling location, depth, sample number, time collected, person collecting sample and provide the analytical results. A report shall be

presented weekly to the CO stating the contractors opinion of the data's completeness, accuracy, and possible contamination trends.

3.5.7 A separate letter report for containers containing agent, agent-contaminated media, and hazardous waste shall be submitted to the CO. The contractor shall identify, at a minimum, the container identification number and size, the location and total number of containers in each area and site wide, and the number of samples obtained to fully characterize the containers, the analytical methods used, and the analysis obtained. The letter shall also propose disposal options and cost for HTW. A preferred alternative for disposal for HTW shall be provided which includes, at a minimum, the proposed disposal location(s), associated treatment, time frame associated with storage, removal and treatment, regulatory impacts, and cost.

3.6 (TASK 6) INVESTIGATIVE WASTE (IW).

3.6.1 If directed by CEHNC, the contractor shall dispose of the bulk and/or containerized IW. The containers shall be located, secured, labeled, sampled (if necessary), and analyzed IAW the approved Work Plan. After receipt of the letter report recommending appropriate disposal actions, the CO shall direct the contractor in the disposal of IW. The contractor shall perform the IW disposal in a timely manner.

3.6.2 All activities involving this work shall be conducted in full compliance with the State of Tennessee, the US Environmental Protection Agency (EPA), CEHNC, DDMT, USACE, DA, and DOD laws and regulations regarding personnel, equipment, and procedures.

3.6.3 The contractor shall obtain and submit competitive bids **in accordance with the FAR** to dispose of this type of hazardous waste. The contractor shall provide the basis of

subcontract selection and provide a recommended subcontractor in the disposal of the hazardous waste. The contractor shall describe each subcontract activity and associated points of contact. **The selection of the TSD subcontract shall be in accordance with the FAR.**

3.6.4 The contractor shall obtain all necessary licenses and permits, and comply with all applicable federal, state, and local laws, codes, and regulations in connection with the execution of the work. Shipment or transportation shall be in accordance with Department of Transportation Hazardous Material Regulations 49 CFR 100-199.

3.6.5 The contractor shall furnish and prepare all required hazardous waste manifests, which shall include a correct description of all wastes to be shipped, in a complete and legible manner. The contractor shall provide all necessary information required for each manifest to satisfy all federal, state, and local regulations prior to shipment. Manifests shall be prepared in a manner as to comply with the format prescribed by the state and EPA regulations. The contractor shall coordinate all entries in the manifests with the TSDF, CEHNC, and DDMT. Completed copies of all manifests, showing DDMT as the generator, shall be forwarded to the CEHNC for review after coordination with the TSDF and at least ten (10) working days prior to waste shipment. Revisions requested by the Government shall be made by the contractor. No shipment will occur until the Government is satisfied that all entries are correct and the manifest has been signed by an authorized representative of DDMT. If requested by CEHNC, the contractor will set up and participate in one or more conference calls with CEHNC, DDMT, the TSDF, subcontractor, and any other party designated by CEHNC to resolve any and all questions pertaining to the manifests.

The contractor will provide the manifest signed by all necessary parties to CEHNC and DDMT within twenty (20) working days after the shipment of hazardous waste has left Government premises.

3.6.6 Waste Profile Sheets. The contractor shall prepare Waste Profile Sheet(s) and provide a copy to CEHNC and DDMT.

3.6.7 Weight Slips. A signed weight slip shall be furnished to CEHNC and DDMT indicating the actual weight of the waste that has been shipped to the approved disposal facility.

3.6.8 Notification of Waste Shipped. A Notification of Waste Shipped form required under the Land Ban Disposal restrictions shall be completed and furnished by the contractor to CEHNC and DDMT for review and approval. This sheet shall identify associated treatment standards required in 40 CFR 268. Any corrections required by CEHNC and DDMT shall be made by the contractor. A copy of the approved Notification of Waste Shipped shall be provided by the contractor to CEHNC and DDMT.

3.6.9 Hazardous Waste Disposal. The contractor shall provide all personnel and equipment to dispose of hazardous waste in accordance with the approved Work Plan and this SOW. Disposal of the material shall be by a RCRA permitted TSD facility.

3.6.10 Certificate of Disposal. A Certificate of Disposal indicating acceptance of all items by the authorized TSDF shall be signed by an authorized representative of the TSDF and furnished to CEHNC and DDMT within 10 working days after final disposal action has been accomplished. Such certification at a minimum shall show:

- the material (by item and quantity) that was disposed,
- the specific method of treatment, and
- the date of treatment.

3.7 (TASK 7) PROCESS SCRAP METAL. All scrap metal recovered from excavations where agent has been identified shall be placed by the

contractor in a container capable of being sealed and heated to 70 degrees F. After heating the container shall be monitored by CBDCOM for agent. If monitoring reveals agent, the contractor shall package it for shipment. The contractor shall provide a hazardous waste storage and/or disposal facility capable of accepting and treating waste. The contractor shall provide all necessary personnel and equipment to accomplish this task. Prior to beginning work, the contractor shall submit his proposed method of accomplishing this task for approval. If results of the air, soil, and residue sampling indicate no agent contamination, the contractor shall make provisions for disposal.

3.8 (TASK 8) CONVENTIONAL UXO DISPOSAL. The contractor shall provide all necessary personnel and equipment to dispose of all conventional UXO. Should the contractor discover UXO that is suspect CWM, or is unknown to them, they will "safe the hole" and immediately withdraw from the exclusion zone and revert to a support role for the Technical Escort Unit (TEU). TEU will perform the assessment of the item and, if it is CWM, they will package and transport the item to the IHF and turn the site back to the contractor to resume operations.

3.9 (TASK 9) . Engineering Controls. Based upon the Maximum Credible Event (MCE), which is determined by the CEHNC, the down wind hazard calculations, and the No Significant Effects (NOSE) distance, engineering controls will be required. The contractor, in conjunction with CBDCOM, shall make recommendations of engineering controls for consideration. The recommendations shall consider schedule, constructability, feasibility, agent compatibility, decontamination, and release control at a minimum. The engineering controls evaluation shall be documented in a letter report.

3.9.1 Structure and Filtering System. A structure shall be provided to control the release of agent to personnel outside the exclusion zone. The structure shall be pre-engineered, with capacity for agent filtration. The structure shall be erected to ensure intrusive operations do not result in a release outside the exclusion zone. The structure shall be capable of being decontaminated if a release occurs. The contractor, in conjunction with CBDCOM, shall identify the design requirements for the agent filtration system and it shall be selected based upon those design requirements. The contractor, assisted by CBDCOM, shall install and operate the agent filtering system. **The filtering system shall be Government Furnished Equipment (GFE).** The filtering system shall be periodically monitored to ensure that breakthrough has not occurred. The contractor shall be responsible for the decontamination of the structure and for the removal of the structure once intrusive operations are concluded.

3.9.2 The downwind hazard distances are computed using the D2PC computer model. This program will be provided to the contractor by TEU. Downwind hazard monitoring will be accomplished every two hours or if there are significant changes in meteorological conditions while intrusive activities are ongoing.

3.9.3 The MCE is two (1"-by-9") vials (40 ml) of phosgene, based on K951 and K952 type CAIS.

3.10 (TASK 10) MEETINGS AND PUBLIC INVOLVEMENT. The contractor shall provide a minimum of two professionals thoroughly familiar with the project to attend meetings as required. Assume three one-day meetings will be held at or close to DDMT, and one meeting will be held at CEHNC (Huntsville, Alabama). The contractor shall be prepared to show overheads or use other presentation techniques to

convey to the Government, public and regulatory agencies their plans, findings, and recommendations.

3.11 (TASK 11) RECORD AND SUBMIT VIDEO TAPE.

3.11.1 The contractor shall furnish the necessary personnel and equipment to video tape a sample of each activity from all field tasks of this SOW. Taping shall be of typical activities and accurately depict all work accomplished.

3.11.2 The video tape shall be standard VHS 1/2-inch color tape with voice background describing the actions being filmed, containing a maximum of 120 minutes footage.

3.11.3 Two copies of the video tape shall be submitted as part of the Engineering Report.

3.12 (TASK 12) PROJECT MANAGEMENT. The contractor shall, during the life of the Task Order, manage the Task Order to accomplish the Scope of Work. All project management associated with this Task Order, with the exception of direct technical oversight of work described in the preceding tasks, shall be accounted for in this task. As part of this task, the contractor shall prepare and submit work task proposals that outline the manner in which the contractor intends to accomplish each task in this SOW. The work task proposals shall include the scope of work and level of effort required for the task, milestones, expected completion dates, and any other planning data the contractor will use to accomplish each task.

3.13 (TASK 13) ENGINEERING REPORT. The contractor shall prepare and submit an Engineering Report fully documenting the field work removal actions and subsequent evaluations and recommendations made by the contractor. The Engineering Report shall describe the site history, briefly describe previous work conducted at DDMT, the work conducted under this task order, and the results. The report shall

also contain the conclusions as to the nature and extent of contamination at this site. The textual portions of the report shall be fully supported with accompanying maps, charts, and tables as necessary to fully describe and document all work performed.

4.0 SCHEDULE and SUBMITTALS. The contractor shall submit all deliverable data to the Contracting Officer and other reviewers identified in Section 4.2 in accordance with the following schedule. All submittals shall be delivered to all addressees no later than the close of business on the day indicated in this paragraph. In addition, submittals to regulatory reviewers shall be shipped by registered mail or other method where a signed receipt is obtained indicating the date received and the individual accepting the submittal.

4.1 Schedule:

DOCUMENT	DATE DUE
	Days after NTP
Work Task Proposal	TBD
Draft Work Plan	55 days after award
Comments on Draft Work Plan	TBD
Draft-Final Work Plan/Draft SS	21 days after draft comments recd
Comment on Draft-Final Work Plan/Draft SS	TBD
Final Site Safety Submission (SS)	TBD
Comment on SS	TBD
Letter Reports	TBD

Draft Technical Report/NFRAP	TBD
Comments on Draft Report	TBD
Final Technical Report/NFRAP	TBD
Monthly Report	NLT 10th of following month
Minutes of Meetings	NLT 2 days after each Meeting / Presentation
Color Photographs	TBD
Video Tape	TBD

The overall completion date of this Task Order is TBD.

* days are working days not calender days

4.2 Addresses. The following addresses shall be used in mailing submittals:

ADDRESSEE	Draft Submittals	Draft Final & Final Submittals
Commander US Army Engineering and Support Center, Huntsville ATTN: CEHNC-OE-DC, 4820 University Square Huntsville, Alabama 35816-1822	6	6
HQU SACE Attn.: CESO-E 20 Massachusetts Av, NW Washington, DC 20314-1000	4	4

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USATCES Attn: SIOAC-ESM 1 C Tree Road McAlester, OK 74501	1	1
Program Manager for Chemical Demilitarization, Environmental Monitoring Attn: SFAE-CD-ME 0.0 APG-EA, MD 21010-5401	1	1
Program Manager for Chemical Demilitarization, Risk / Surety Management Attn: SFAE-CD-SQ APG-EA, MD 21010-5401	1	1
Program Manager for Chemical Demilitarization, Public Affairs Attn: SFAE-CD-P APG-EA, MD 21010-5401	1	1
Program Manager for Chemical Demilitarization, Project Manager, Non-Stockpile Chemical Material Attn: SFAE-CD-NM, Mr. Steven Bird APG-EA, MD 21010-5401	1	1
CBDCOM Risk Management 5232 Fleming Road ATTN: ANSCB-RA (Lt. Col. David Mukei) Aberdeen Proving Grounds, MD 21010-5423	1	1

COMMANDER CBDCOM 5232 Fleming Road ATTN: SMCTE-OP Aberdeen Proving Grounds, MD 210 10-5 4 23	1	1
ERDEC/ Chemical Support Division ATTN: SCBRD-ODC-M, Mr. Gary Lattin Aberdeen Proving Grounds, MD 21010-5423	1	1
COMMANDER USATEU ATTN: SMCTE-OP Aberdeen Proving Grounds, MD 21010-5423	1	1
US Army Engineer District, Mobile ATTN: CESAM-PM-TA (Mr. Kurt Braun) PO Box 228 Mobile , AL 36628-0001	1	3
U.S. Environmental Protection Agency ATTN: MR. Dann Spariosu 100 Alabama St. SW Atlanta, GA 30303	0	2
Defense Distribution Region East ATTN: ASCE-WP (Mr. Mike Dobbs) Bldg 1-1, 2nd Floor New Cumberland, PA 17070-5001	0	5

Defense Logistics Agency ATTN: Ms. Karen Moran 8725 John J. Kingman Road Suite 2533 Ft Belvoir, VA 22060-6219	2	2
Defense Logistics Agency Defense Distribution Depot Memphis ATTN: DDMT-DE (Mr. Glenn Kaden) 2163 Airways Blvd Memphis, TN 38114-5210	1	1
Defense Logistics Agency ATTN: DLA-WS Alexandria, VA 22303-6100	1	1

4.3 Format and Content of Technical Report. All drawings shall be of engineering quality with sufficient details. The report shall consist of 8 1/2" X 11" paper. The report covers shall consist of durable, hard cover with front and spine title, 3-ring binders that shall hold pages firmly while allowing easy removal, addition, or replacement of pages. A title shall identify the contents of the binder, the site, the contractor, the Huntsville Center, and the date. The contractor identification shall not dominate the title page.

4.4 Review Comments. The contractor shall review all comments received through the CEHNC Project Manager and evaluate their appropriateness based upon merit. The contractor shall incorporate all applicable comments and provide a written response to each comment no later than 21 days after the contractor receives the comment.

4.5 Identification of Responsible Personnel. Each submittal shall identify the specific members and title of the subcontractor and contractor's staff who had significant input into the report. All final submittals shall be sealed by the State of Tennessee registered Professional Engineer-In-Charge.

4.6 Presentations. The contractor shall make presentations of all work performed as directed by the Contracting Officer. The presentation shall consist of a summary of the work accomplished and will be followed by an open discussion.

4.7 Minutes of Meetings. Following the presentation and the public meeting, the contractor shall prepare and submit minutes of the meeting within 10 working days to the Contracting Officer.

4.8 Correspondence. The contractor shall keep a record of all phone conversations and written correspondence affecting decisions relating to the performance of this task order. A summary of the phone conversations and copies of written correspondence shall be submitted to the Contracting Officer with the monthly progress report.

4.9 Monthly Progress Report. The contractor shall prepare and submit monthly progress reports describing the work performed since the previous report, work currently underway, and work anticipated. The report shall state whether current work is on schedule. If the work is not on schedule, the contractor shall state what actions are taken in order to get back on schedule. The report shall be submitted to the Contracting Officer not later than the 10th day of each calendar month.

4.10 Computer Files. All final text files generated by the contractor under this task order shall be furnished to the contracting Officer in Microsoft Word (latest version), IBM personal computer (PC) compatible format. All drawings shall be on

reproducible (mylar) and digitized 3D design file in Intergraph Corporation format, compatible with the CEHNC Graphics System.

5.0 SAFETY REOUIREMENTS

5.0.1. The contractor shall prepare and submit a Site Safety and Health Plan (SSHP) to the CO for review and approval prior to commencement of any field work.

5.0.2 The SSHP shall be prepared in accordance with the requirements specified in this section and shall comply with all federal, state, and local health and safety requirements, e.g., the Occupational Safety and Health Administration (OSHA) requirements (29 CFR 1910 and 1926), the U. S. Environmental Protection Agency (USEPA) hazardous waste requirements (40 CFR 260 -270), the U. S. Army Corps of Engineers Safety and Health Requirements Manual (EM 385-1-1), the U.S. Army Corps of Engineers Safety and Occupational Health Document Requirements for HTW and OE Activities (ER 385-1-92), and applicable Army regulations. The contractor shall submit versions of this document in accordance with the schedule provided in this SOW. The contractor shall revise and re-submit this document as necessary to address all comments and deficiencies.

5.0.3 The SSHP shall address the elements as described in this section. The level of detail provided shall be tailored to the type of work, complexity of operations to be accomplished, and the hazards anticipated. When a specific element is not applicable, state that adequate consideration was given the topic and provide a brief justification for its omission. Memorandums of Understanding (MOU) and Memorandums of Agreement (MOA) must be in place prior to contractor starting work.

5.1 General. The SSHP shall be reviewed, approved, and implemented by a board-certified or board-eligible Industrial

Hygienist with at least two (2) years hazardous waste site operations experience. Board certification or eligibility shall be documented by written confirmation from the American Board of Industrial Hygiene (ABIH) and submitted to the Contracting Officer for review. A fully trained and experienced site safety and health officer (SSHO) responsible to the contractor shall be delegated to implement the on-site elements of the SSHP. The SSHP shall be in a form usable by authorized U.S. Government representatives and other authorized visitors to the site during site operations.

5.2 Staff Organization. Qualifications and Responsibilities. The operational, health and safety responsibilities of each key person shall be provided. The organizational structure with lines of authority and overall responsibilities for safety and health of the contractor and all subcontractors, including government agencies and their contractors, shall be discussed. An organizational chart showing the lines of authority for safety shall be provided. Each person assigned specific safety and health responsibilities shall be identified and his/her qualifications and experience documented by a resume in the SSHP.

5.3 Site Description and Contamination Characterization. Provide a description of the site based on results of previous studies, site history, and prior site uses and activities. Describe the location topography and approximate size of the site, the on-site job tasks to be performed, and the duration of planned activities. Compile a summary of hazardous substances and safety and health hazards likely to be encountered on site. Include ordnance and chemical/biological names, concentration ranges, media in which found, locations on-site, and estimated quantities/volumes to be impacted by site work. The site descriptions shall be based

on results of previous studies and the history of prior site uses and activities conducted under Task 1 of this Scope of Work.

5.4 Hazard Assessment and Risk Analysis. In the SSHP, the 1910.120 (e). In addition, site-specific, supervisory, refresher, visitor training, training IAW the aforementioned regulation, and training IAW DA PAN 385-61 shall be addressed. The content, duration, and frequency of all training shall be described. The contractor shall provide written certification to the Contracting Officer that the required training has been received by the contractor's affected personnel prior to engaging in on-site activities.

5.5 Accident Prevention. The SSHP may serve as the Accident Prevention plan provided it addresses all content requirements of both 29 CFR 1910.120 and EM 385-1-1 (Appendix A). All Accident Prevention Plan elements required by EM 385-1-1, but not specifically covered by these elements shall be addressed in this section of the SSHP. Daily safety and health inspections shall be conducted to determine if site operations are conducted in accordance with the approved plans and contract requirements.

5.6 Training. All general site workers shall receive 40 hours of initial off-site health and safety training (24 hours for non-exposed on-site personnel) which is relevant to hazardous waste site activities, plus three days of supervised field experience (one day for non-exposed personnel), in compliance with 29 CFR

1910.120 (e). In addition, site-specific, supervisory, refresher, visitor training, training IAW the aforementioned regulation, and training IAW DA PAM 385-61 shall be addressed. The content, duration, and frequency of all training shall be described. The contractor shall provide written certification to the Contracting Officer that the required training has been received by the contractor's affected personnel prior to engaging in on-site activities.

5.7 Personal Protective Equipment. A written Personal Protective Equipment Program shall be provided in the SSHP. The program shall address all the elements of 29 CFR 1910.120 (g) (5), 29 CFR 1910.132, and 29 CFR 1910.134. Minimum levels of protection necessary for each task/operation performed at each site will be based on probable site conditions, potential occupational exposure (including heat/cold stress), and the hazard assessment/risk analysis required above. Include specific types and materials, for protective clothing and respiratory protection. Establish and justify upgrade/downgrade criteria based upon the action levels as required.

5.7.1 As a minimum and as appropriate the following emergency and first aid equipment shall be immediately available for on-site use: (1) First aid equipment and supplies approved by the consulting physician; (2) Emergency eye washes/showers which comply with ANSI Z-358.1; (3) **Emergency use** respirators (worst case appropriate); (4) Spill control materials and equipment and (5) Fire extinguishes (specify type, size and locations)

5.7.2 The contractor shall prepare and submit for approval a PPE matrix to the CO through the Department of Army Safety Office. In this matrix the contractor shall discuss Level A protective equipment to use on site and use scenarios. The format for this

matrix may be obtained from the CEHNC Safety Office. The PPE matrix is submitted separately from the Safety Submission. Several Level A suits have already been approved by the Army for use in CWM sites. The contractor may contact CEHNC Safety Office to obtain a list of the approved suits.

5.7.3 TEU will wear the DA equivalent to the levels prescribed for the activity engaged in. TEU will provide this information to the contractor.

5.8 Medical Surveillance. All personnel performing on-site activities shall participate in an ongoing medical surveillance program meeting the requirements of 29 CFR 1910.120, ANSI Z-88.2 and DA PAM 40-173, as applicable. The medical examination protocols and results shall be overseen by a licensed physician who is certified in Occupational Medicine by the American Board of Preventive Medicine, or who by necessary training and experience, is board eligible. Minimum specific exam content and frequency based on probable site conditions, potential occupational exposures, and required protective equipment shall be specified. A written medical opinion from the examining physician as to fitness to perform the required work shall be made available to the CO upon request for any site employee.

5.9 Environmental and Personal Monitoring. Where it has been determined that there may be employee exposure to on- and/or off-site migration airborne concentrations of hazardous substances, appropriate direct reading (real-time) air monitoring and integrated (time weighted average) air sampling shall be conducted in accordance with applicable federal, state, and local requirements. Both air monitoring and air sampling must accurately represent concentration of air contaminants encountered on and leaving the site. The types and frequency of

monitoring/sampling to be performed shall be specified for on-site and perimeter, where applicable. Where perimeter monitoring is not deemed necessary, provide suitable justification for its exclusion. When applicable, NIOSH and/or EPA sampling and analytical methods shall be used. Personal samples, where necessary, shall be analyzed by laboratories successfully participating in and meeting the requirements of the American Industrial Hygiene Association's Proficiency Analytical Testing or laboratory Accreditation Program. Include, as appropriate, real-time (direct-read) monitoring and integrated Time Weighted Average sampling for specific contaminants of concern. Meteorological, noise, and radiation monitoring shall be conducted as needed depending upon the site hazard assessment. All monitoring and sampling protocols shall be specified to include instrumentation to be used and calibration of instruments. All monitoring results shall be compared to action levels to determine the need for corrective actions. Agent monitoring shall use ERDEC protocols. Action levels will be in accordance with AR 385-1 and DA PAM 385-1. The contractor shall coordinate with ERDEC and TEU through CEHNC.

5.10 Heat/Cold Stress Monitoring. Heat and cold stress monitoring protocols, as appropriate, shall be described in detail. Work/rest schedules shall be determined based upon ambient temperature, humidity, wind speed (wind chill), solar radiation intensity, duration and intensity of work and protective equipment ensembles. Minimum required physiological monitoring protocols which will affect work schedules shall be developed. In cases where impervious clothing is worn the NIOSH/OSHA/USCG/EPA "Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities" protocol for prevention of heat stress shall be followed and heat stress monitoring shall commence at temperatures

of 70 degrees F and above. Where impervious clothing is not worn, the ACGIH heat stress standard shall be used. For cold stress monitoring to help prevent frostbite and hypothermia, the ACGIH cold stress standard shall be referenced and followed as a minimum.

5.11 Site Control. The contractor, coordinating with TEU, shall describe site control measures which include site maps, the work zone delineation and access points, the on/off site communication system, general site access controls, and security procedures (physical and procedural)

5.12 Personnel and Equipment Decontamination. The contractor, coordinating with TEU, shall develop and specify decontamination procedures in accordance with 29 CFR 1910.120, AR 385-61 and DA PAM 385-61 for personnel, personal protective equipment, monitoring instruments, sampling equipment, and heavy equipment. Decontamination procedures shall address specific measures to ensure that contamination is confined to the work site. Necessary facilities and their locations, detailed standard operating procedures, frequencies, supplies and materials to accomplish decontamination of site personnel and to determine adequacy of equipment decontamination shall be discussed.

5.13 Emergency Response and Contingency Procedures (On-site and Off-site). An Emergency Response Plan as required by 29 CFR 1910.120 and DA PAM 50-6 shall be developed and implemented by the contractor in coordination with TEU. As a minimum it shall address the following elements: (1) pre-emergency planning and procedures for reporting incidents to appropriate government agencies for potential chemical exposure, personal injuries, fire/explosions, environmental spills and releases; (2) personnel roles, lines of authority, communications; (3) posted instructions and list of emergency contact: physician; nearby notified medical facility,

fire and police departments, ambulance service, state/local/federal environmental agencies, CIR, and Contracting Officer; (4) emergency recognition and prevention; (5) site topography, layout and prevailing weather conditions; (6) criteria and procedures for site evacuation (emergency alerting procedures/employee alarm system, emergency PPE and equipment, safe distance, place of refuge, evacuation routes, site security and control; (7) specific procedures for decontamination and medical treatment of injured personnel; (8) route maps to nearest pre-notified medical facility; (9) criteria for initiating community alert program, contacts and responsibilities; and (10) critique of emergency responses and follow-up. Material Safety Data Sheets for each hazardous substances anticipated to be encountered on site shall be made accessible to site personnel at all times and shall be submitted in an appendix to the SSHP.

5.13.1 On-Site Emergency and First Aid Equipment. As a minimum and as appropriate the following emergency and first aid equipment shall be immediately available for on-site use: (1) First aid equipment and supplies approved by the consulting physician; (2) emergency eyewashes/showers which comply with ANSI Z-358.1; (3) emergency use respirators (worst case appropriate); (4) spill control materials and equipment and (5) fire extinguishes (specify type, size and locations) Specify in the plan the location(s) of these materials.

5.14 Standing Operating Procedures, Engineering Controls, and Work Practices. The contractor, coordinating with TEU, shall develop standing operating procedures to protect field personnel, prevent accidents, minimize hazards and to take action to correct hazards where necessary. Site rules and prohibitions for safe work practices shall be discussed and shall include such topics as use

of the buddy system, smoking restrictions, material handling procedures, confined space entry, excavation safety, physiological and meteorological monitoring for heat/cold stress, illumination, sanitation, and daily safety inspections, etc. This list of topics is not intended to be all inclusive.

5.15 Logs, Reports, and Record Keeping. Record keeping procedures for training logs, daily safety inspection logs, employee/visitor registers, medical surveillance records and certifications, air monitoring results, and personal exposure records shall be specified. All personnel exposure and medical monitoring records shall be maintained in accordance with applicable OSHA standards, CFR 1904, 1910 and 1926. The contractor shall develop, retain, and submit training logs, daily safety inspection logs as part of the daily QC Reports, employee/ visitor registration and medical opinions/certifications as part of the final contract file. All recordable accidents/ injuries/illnesses shall be reported to the CO in accordance with EM 385-1-1 and AR 385-40 with USACE Supplement. A completed ENG 3394, Accident Investigation Report, shall be submitted within two working days in accordance with AR 385-40 and USACE Supplement 1 to that regulation.

5.16 Air Monitoring Plan. The contractor shall prepare and submit an Air Monitoring Plan as part of the SSHP. The contractor, coordinating with TEU, shall provide a description of equipment and procedures to be used for monitoring of air quality during all phases of work. At a minimum, air quality monitoring of the ambient air shall be carried out on a real-time basis using an organic vapor detection equipment capable of monitoring ambient air to local and state guideline standards. The plan shall identify specific air sampling equipment, locations, and frequencies. The

contractor shall coordinate the Air Monitoring Plan with the CEHNC Safety Office, which will in turn coordinate with CBDCOM.

5.17 Conventional Q~ If UXO encountered is determined to be conventional UXO (i.e. have a high explosive, white phosphorous, or smoke charge), the contractor shall provide the necessary actions to dispose of it. The contractor shall mark the location and notify the COE on-site Safety Specialist. If not available, the contracting officer shall be notified. The contractor shall have on-site capability to evaluate any conventional UXO encountered.

6.0 CHEMICAL DATA AND LABORATORY REQUIREMENTS

6.1 Quality Assurance Project Plan (QAPP). The contractor shall use the generic QAPP for DDMT to the extent possible for all HTW sampling. A site specific Chemical Data Laboratory and Field Work Sampling Plan shall be prepared by the contractor. The plan shall describe field and laboratory procedures. The plan shall clearly describe how the contractor shall ensure that sample integrity and chain-of-custody of all samples are not compromised prior to delivery to an off-site laboratory. The plan should describe the procedures which will be used to document and report precision, accuracy, and completeness of data results. The plan shall be a brief and concise description of the field and laboratory work required. Previously prepared Work Plans for similar type of work shall be used as much as possible in the preparing the plan. The data quality and quality control applies to both the field and laboratory efforts. Results of the field and laboratory controls shall be evaluated and placed in the analytical data submittal, and the draft and final Technical Reports. The contractor shall provide the laboratory QA/QC plan as an appendix to the QAPP. The plan shall address each requirement as identified in ER 1110-1-263 (Reference 8.17).

6.2 Laboratory Qualifications. The analytical laboratory used by the HTW contractor for COC analysis must be validated or certified by the Corps of Engineers' Missouri River Division (CEMRD) and ERDEC, and must have the capability to perform the analytical methods required by this SOW. The laboratory shall be an EPA contract lab or be familiar with the Contract Laboratory Program (CLP) requirements and can perform CLP work.

6.3 Coordination with Government Quality Assurance Laboratory. The contractor must provide coordination and quality assurance samples to the Government Quality Assurance (GQA) lab. Each field control sample collected shall be divided equally, one portion sent to the GQA lab and the remainder sent to the contractor's lab. GQA samples include all sample matrices and analysis parameters. The contractor shall provide the GQA laboratory a two week notice of sample shipment. The Government will identify the GQA laboratory.

6.4 Data Reporting Requirements. The contractor shall provide the following data reporting elements: sample ID, sample receipt, organic and inorganic reporting, internal quality control reporting (lab blanks, surrogate spike samples, lab duplicates or matrix spikes) and field duplicates and blanks. Data shall be provided IAW USACE requirements and USEPA requirements. This data shall be included in the raw data submittal as well as in electronic form in the Technical Reports. The contractor laboratory must hold and make available all project raw data for a period of five years after completion of this contract. The contractor must validate all the data. Complete data validation shall be performed on 10% of the sample analysis packages.

6.4.1 Minimum Raw Data Reporting Requirements:

6.4.1.1 Sample Identification (ID). The contractor shall prepare a tabular presentation which matches contract laboratory sample ID to QA laboratory sample ID. This table shall identify all Field Duplicates and Field Blanks (including rinsates and trip blanks) as such. This table shall also match all rinsates with their corresponding field samples as well as matching each trip blank with the samples that accompanied it during shipment.

6.4.1.2 Sample Receipt. The contractor shall complete and report a "Cooler Receipt Form" for all shipments for purposes of noting problems in sample packaging, chain-of-custody, and sample preservation. An example form is available from CEMRD-EDGL.

6.4.1.3 General Organic and Inorganic Reporting. For each analytical method run, the contractor shall report all analytes for each sample as a detected concentration or as less than the specific limits of quantitation. Generally, all samples with out-of-control spike recoveries being attributed on matrix interferences shall be designated as such. All soil/sediment and solid waste samples shall be reported on a dry-weight basis with percent moisture also reported. The contractor shall also report dilution factors for each sample as well as the date of extraction (if applicable) and date of analysis.

6.4.1.4 Internal Quality Control Reporting (at a minimum, internal quality control samples shall be analyzed at rates specified in the specific methods or as specified in the SOW if higher rates are required to meet project specific Data Quality Objectives)

6.4.1.4.1 Laboratory Blanks (Method Blanks and Instrument Blanks). All analytes shall be reported for each laboratory blank. All non-blank sample results shall be designated as corresponding

to a particular laboratory blank in terms of analytical batch processing.

6.4.1.4.2 Surrogate Spike Samples. Surrogate Spike Recoveries shall be reported with all organic method reports where appropriate (i.e. when the method requires surrogate spikes). The report shall also specify the control limits for surrogate spike results as well as the spiking concentration. Any out-of-control recoveries (as defined in the specified method) shall result in the sample being rerun (both sets of data are to be reported) or data being flagged.

6.4.1.4.3 Matrix Spike Samples. Matrix Spike Recoveries shall be reported for all organic and inorganic analyses. All general sample results shall be designated as corresponding to a particular matrix spike sample. The report shall indicate which field sample was spiked even if it was not a Corps of Engineers project sample. The report shall also specify the control limits for matrix spike results for each method for each matrix.

6.4.1.4.4 Laboratory Duplicates and/or Matrix Spike Duplicate Pairs. Relative Percent Difference shall be reported for all duplicate pairs as well as analyte/matrix specific control limits.

6.4.1.4.5 When run for internal quality control, Laboratory Control Standard's (LCS) results shall be reported with the corresponding field sample data. Control limits for LCSs shall also be specified.

6.4.1.5 Field Duplicates and Field Blanks. These samples shall be identified as such by the contractor and reported as any other field sample. Relative Percent Differences shall be reported for all field duplicate pairs.

6.5 Data Quality. The contractor shall provide a data quality level that is compatible with a RI/FS, study. The data quality must be sufficient to be utilized in the site wide RI/FS, Risk Assessment, and Remedial Action Plans that will be prepared by the US Army Corps Of Engineers.

7.0 Public Affairs. The contractor shall not publicly disclose any data generated or reviewed under this contract. The contractor shall refer all requests for information concerning the site condition to the CEHNC Project Manager. Reports and data generated under this task order are the property of the Department of Defense and distribution to any other sources by the contractor, unless authorized by the Contracting Officer, is prohibited.

8.0 References

8.1 "U.S. Army Corps of Engineers Safety and Health Requirements Manual", U.S. Army Engineer Manual EM 385-1-1, 3 September 1996.

8.2 "Engineering Transmittal Letter 385-1-1, Safety Concepts and basic Considerations for Unexploded Ordnance (UXO) Operations", 16 Feb. 1996, Huntsville Division, U.S. Army Corps of Engineers.

8.3 "Environmental Chemistry and Fate of Chemical Warfare Agents". Southwest Research Institute. Prepared for Corps of Engineers, Huntsville Division, March 3, 1994.

8.4 "Field Manual on Environmental Chemistry and Fate of Chemical Warfare Agents". Southwest Research Institute. Prepared for Corps of Engineers, Huntsville Division, July 7, 1994.

8.5 Army Regulation 385-40, Accident Reporting and Records with USACE Supplement, 1 November 1994 w/changes.

8.6 Ammunition and Explosive Standards, DA PAM 385-64

8.7 "Safety and Occupational Health Document Requirements for Hazardous Waste Site Remedial Actions", Engineer Regulations

385-1-92, 18 March 1994.

8.8 "Chemical Data Quality Management for Hazardous Waste Remedial Activities", Engineer Regulation 1110-1-263, 1 Oct 90.

8.9 Occupational Safety and Health Administration Standards (29 CFR 1910 and 1926)

8.10 "Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities", NIOSH/OSHA/USCG/EpA, October 1985.

8.11 "Emergency Eyewash and Shower Equipment", ANSI Z-358.1, 1990.

8.12 "Practices for Respiratory Protection", ANSI Z-288.2, 1980.

8.13 RCRA Ground water Monitoring Technical Enforcement Guidance Document.

8.14 "Test Methods for Evaluating Solid Wastes," USEPA Pub. No. SW- 846, Latest Ed.

8.15 "Annual Book of ASTM Standards", Current edition. -

8.16 "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" EPA/540/G-89/004, October 1988.

8.17 Engineering Regulation (ER) 1110-1-263 "Chemical Data Quality Management for Hazardous, Toxic Radioactive Waste Remediation Activities " U.S. Army Engineering Regulation, April 1996.

8.18 "CERCLA Compliance With Other Laws Manual. Parts I and II", U.S. Environmental Protection Agency (EPA). 1988b.

8.19 "Methods for Evaluation the Attainment of Cleanup Standards. Volume I - Soils and Solid Media", U.S. Environmental Protection Agency (EPA). 1989e.

8.20 "Methods for the Determination of Organic Compounds in Drinking Water", U.S. Environmental Protection Agency (EPA), December 1988

8.21 "Cost Engineering Policy", U.S. Army Engineering Regulation No. 1110-3-1301, April 1994.

- 8.22 Code of Federal Regulations. 40 CFR, Parts 190-299.
Latest edition.
- 8.23 "Hazardous Waste Operations and Emergency Response." Code of Federal Regulations. [n.d.] CFR 1910.120, Final Rule.
- 8.24 "Minimum Chemistry Data Reporting Requirements for DERP and Superfund HTW Projects." U.S. Army Corps of Engineers Memorandum, CEMRD-ED-GL. August 1989.
- 8.25 "Compendium of Superfund Field Operations Methods", U.S. Environmental Protection Agency (EPA). 1987
- 8.26 "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA", U.S. Environmental Protection Agency (EPA). EPA 540/g89/004. October 1988.
- 8.27 "Army Toxic Chemical Agent Safety Program", AR 385-61, 28 February 1997.
- 8.28 "Toxic Chemical Agent Safety Standards", DA PAM 385-61, 31 March 1997.
- 8.29 "Chemical Accident or Incident Response and Assistance (CAIRA) Operations", DA PAM 50-6, 17 May 1991 w/changes.
- 8.30 "Occupational Health Guidelines for Evaluation and Control of Occupational Exposure to Mustard Agents H, HD, and HT", DA PAM 40-173, 30 August 1991 w/changes.
- 8.31 "Chemical Surety", AR 50-6, 1 February 1995
- 8.32 Archive Search Report for Defense Depot Memphis Tennessee, U.S. Army Corps of Engineers, St. Louis District, January, 1995.
- 8.33 General Information on EOD Disposal Procedures and CEHNC Safety Concepts and Basic Considerations for UXO, TM 60A-1-1-31.
- ** Additional References may be incorporated and will be finalized at the completion of negotiations.

9.0 Acronyms

ABIH	American Board of Industrial Hygiene (A221)
ACGIH	American Conference of Governmental Industrial Hygienists
AIHA	American Industrial Hygiene Association's
AR	Army Regulation
ASR	Archive Search Report
BRAC	Base Realignment and Closure
CAIRA	Chemical Accident or Incident Response and Assistance
CAIS	Chemical Agent Identification Sets
CBDCOM	Chemical and Biological Defense Command
CEHNC	Corps of Engineers, Huntsville Center
CEMRD	Corps of Engineers' Missouri River Division
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulation
CK	Cyanogen chloride
CN	Chloroacetophenone or Chloromethyl phenyl ketone
CO	Contracting Officer
COC	Contaminants of Concern
CWM	Chemical Warfare Materiel
DA	Department of the Army
DANC	Decontaminating Agent, non-corrosive
DDMT	Defense Depot Memphis Tennessee
DDRE	Defense Distribution Region East
DID	Data Item Description
DERP	Defense Environmental Restoration Program
DLA	Defense Logistics Agency
DM	Adamsite or Diphenylaminochloroarsine
DoD	Department of Defense
DOT	Department of Transportation
EOD	Explosive Ordnance Disposal

EPA Environmental Protection Agency
ECBC Edgewood Chemical Biological Center
ERDEC Edgewood Research, Development and Engineering Center
FAR Federal Acquisition Requirement
GFE Government Furnished Equipment
GQA Government Quality Assurance
HD is also called HS -sulfur mustard-Bis-(2-chloroethyl) sulfid
HSP Health and Safety Program
HTW Hazard and Toxic Waste
IAW In accordance with
ID Identification
IHF Interim Holding Facility
IDW Investigative Derived Waste
IW Investigative Waste
LCS Laboratory Control Standards
MCE Maximum Credible Event
MSDS Material Safety Data Sheets
NCP National Contingency Plan
NFRAP No Further Remedial Action Planned
NIOSH National Institute for Occupational Safety and Health
NOSE No Significant Effects
NPL National Priority List
NTP Notice to Proceed
OE Ordnance and Explosives
OSHA Occupational Safety and Health Administration
OU Operable Unit
PAM Pamphlet
PAT Proficiency Analytical Testing
PELs Protective Exposure Levels
PEP Program Equipment Plan
PC Personal Computer
PMNS Program Manager Non-Stockpile
PPE Personnel Protective Equipment

PS	Chloropicrin or Trichloronitromethane
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
QCP	Quality Control Plan
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SOW	Statement of Work
SSHO	Site Safety and Health Officer
SSHP	Site Safety and Health Plan
SS	Safety Submission
SWMU	Solid Waste Management Unit
TEU	Technical Escort Unit
TSDF	Treatment, Storage, or Disposal Facility
TWA	Time-Weighted Average
USACE	US Army Corp of Engineers
UXO	Unexploded Ordnance
WDCMP	Work, Data, and Cost Management Plan
WWII	World War II

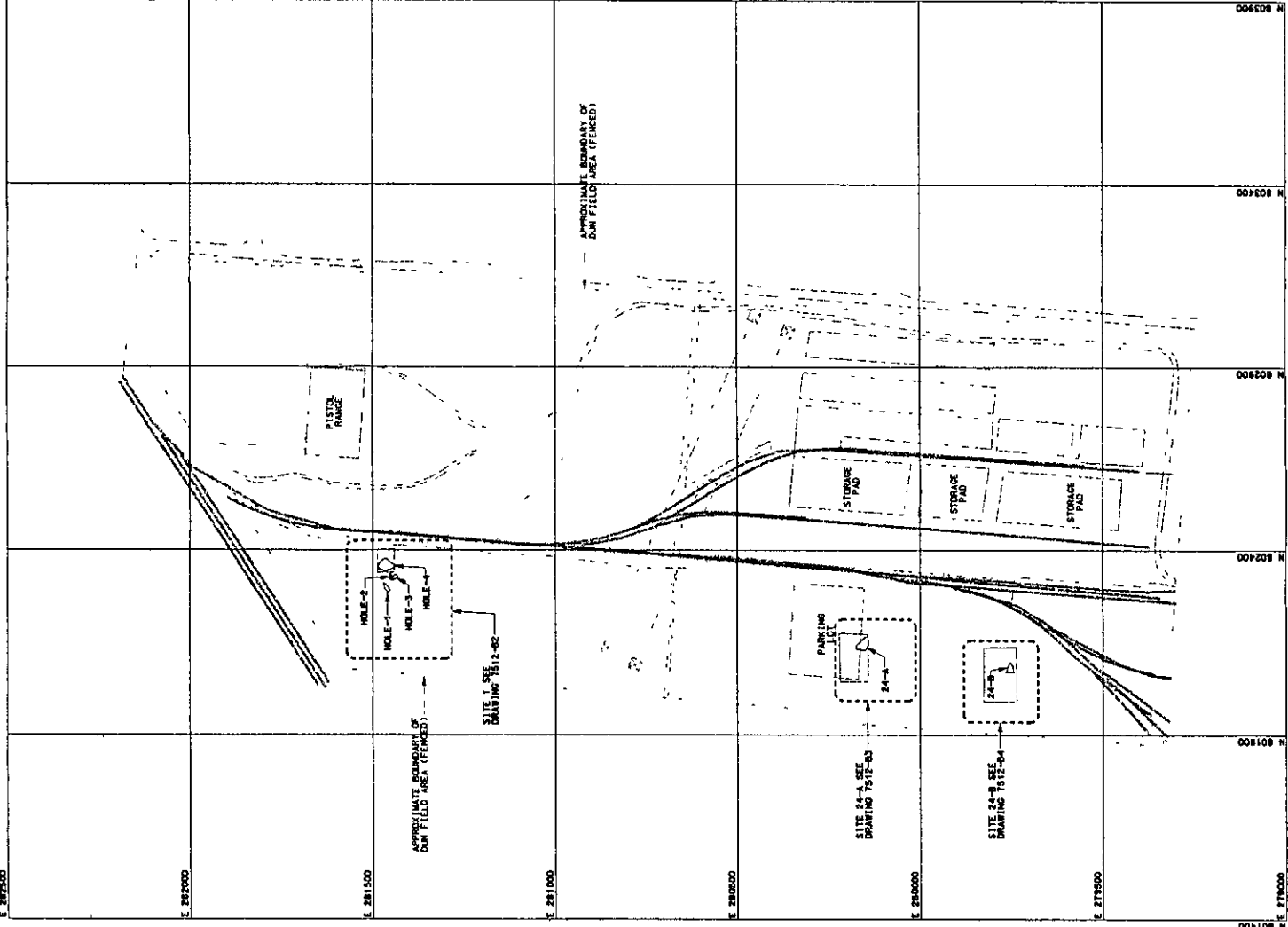
APPENDIX B

MAPS

THE FOLLOWING MAPS ARE LOCATED IN APPENDIX B.

- | | |
|-----|---------------------------------|
| B-1 | SITE MAP – EXCLUSION AREAS |
| B-2 | SITE 1 – CAIS AREA |
| B-3 | SITE 24-A – BOMB CASING AREA |
| B-4 | SITE 24-B – NEUTRALIZATION AREA |

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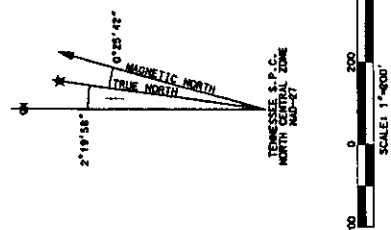
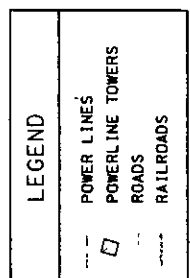
SITE 1 - EAST AREA				
POINT	BEARING	DISTANCE	POINT	EAST
0001	N 10° 15' 30" E	1.0	0002	802.746.0
0002	N 51° 06' 00" E	6.4	0003	802.748.3
0003	N 10° 15' 30" E	1.0	0004	802.748.3
0004	N 51° 06' 00" E	6.4	0005	802.748.3
0005	N 10° 15' 30" E	1.0	0006	802.748.3
0006	N 51° 06' 00" E	6.4	0007	802.748.3
0007	N 10° 15' 30" E	1.0	0008	802.748.3
0008	N 51° 06' 00" E	6.4	0009	802.748.3
0009	N 10° 15' 30" E	1.0	0010	802.748.3
0010	N 51° 06' 00" E	6.4	0011	802.748.3
0011	N 10° 15' 30" E	1.0	0012	802.748.3
0012	N 51° 06' 00" E	6.4	0013	802.748.3
0013	N 10° 15' 30" E	1.0	0014	802.748.3
0014	N 51° 06' 00" E	6.4	0015	802.748.3
0015	N 10° 15' 30" E	1.0	0016	802.748.3
0016	N 51° 06' 00" E	6.4	0017	802.748.3
0017	N 10° 15' 30" E	1.0	0018	802.748.3
0018	N 51° 06' 00" E	6.4	0019	802.748.3
0019	N 10° 15' 30" E	1.0	0020	802.748.3
0020	N 51° 06' 00" E	6.4	0021	802.748.3
0021	N 10° 15' 30" E	1.0	0022	802.748.3
0022	N 51° 06' 00" E	6.4	0023	802.748.3
0023	N 10° 15' 30" E	1.0	0024	802.748.3
0024	N 51° 06' 00" E	6.4	0025	802.748.3
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0026	N 51° 06' 00" E	6.4	0027	802.748.3
0027	N 10° 15' 30" E	1.0	0028	802.748.3
0028	N 51° 06' 00" E	6.4	0029	802.748.3
0029	N 10° 15' 30" E	1.0	0030	802.748.3
0030	N 51° 06' 00" E	6.4	0031	802.748.3
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0033	N 10° 15' 30" E	1.0	0034	802.748.3
0034	N 51° 06' 00" E	6.4	0035	802.748.3
0035	N 10° 15' 30" E	1.0	0036	802.748.3
0036	N 51° 06' 00" E	6.4	0037	802.748.3
0037	N 10° 15' 30" E	1.0	0038	802.748.3
0038	N 51° 06' 00" E	6.4	0039	802.748.3
0039	N 10° 15' 30" E	1.0	0040	802.748.3
0040	N 51° 06' 00" E	6.4	0041	802.748.3
0041	N 10° 15' 30" E	1.0	0042	802.748.3
0042	N 51° 06' 00" E	6.4	0043	802.748.3
0043	N 10° 15' 30" E	1.0	0044	802.748.3
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0045	N 10° 15' 30" E	1.0	0046	802.748.3
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0047	N 10° 15' 30" E	1.0	0048	802.748.3
0048	N 51° 06' 00" E	6.4	0049	802.748.3
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0051	N 10° 15' 30" E	1.0	0052	802.748.3
0052	N 51° 06' 00" E	6.4	0053	802.748.3
0053	N 10° 15' 30" E	1.0	0054	802.748.3
0054	N 51° 06' 00" E	6.4	0055	802.748.3
0055	N 10° 15' 30" E	1.0	0056	802.748.3
0056	N 51° 06' 00" E	6.4	0057	802.748.3
0057	N 10° 15' 30" E	1.0	0058	802.748.3
0058	N 51° 06' 00" E	6.4	0059	802.748.3
0059	N 10° 15' 30" E	1.0	0060	802.748.3
0060	N 51° 06' 00" E	6.4	0061	802.748.3
0061	N 10° 15' 30" E	1.0	0062	802.748.3
0062	N 51° 06' 00" E	6.4	0063	802.748.3
0063	N 10° 15' 30" E	1.0	0064	802.748.3
0064	N 51° 06' 00" E	6.4	0065	802.748.3
0065	N 10° 15' 30" E	1.0	0066	802.748.3
0066	N 51° 06' 00" E	6.4	0067	802.748.3
0067	N 10° 15' 30" E	1.0	0068	802.748.3
0068	N 51° 06' 00" E	6.4	0069	802.748.3
0069	N 10° 15' 30" E	1.0	0070	802.748.3
0070	N 51° 06' 00" E	6.4	0071	802.748.3
0071	N 10° 15' 30" E	1.0	0072	802.748.3
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0073	N 10° 15' 30" E	1.0	0074	802.748.3
0074	N 51° 06' 00" E	6.4	0075	802.748.3
0075	N 10° 15' 30" E	1.0	0076	802.748.3
0076	N 51° 06' 00" E	6.4	0077	802.748.3
0077	N 10° 15' 30" E	1.0	0078	802.748.3
0078	N 51° 06' 00" E	6.4	0079	802.748.3
0079	N 10° 15' 30" E	1.0	0080	802.748.3
0080	N 51° 06' 00" E	6.4	0081	802.748.3
0081	N 10° 15' 30" E	1.0	0082	802.748.3
0082	N 51° 06' 00" E	6.4	0083	802.748.3
0083	N 10° 15' 30" E	1.0	0084	802.748.3
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0091	N 10° 15' 30" E	1.0	0092	802.748.3
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0099	N 10° 15' 30" E	1.0	0100	802.748.3
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0110	N 51° 06' 00" E	6.4	0111	802.748.3
0111	N 10° 15' 30" E	1.0	0112	802.748.3
0112	N 51° 06' 00" E	6.4	0113	802.748.3
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0120	N 51° 06' 00" E	6.4	0121	802.748.3
0121	N 10° 15' 30" E	1.0	0122	802.748.3
0122	N 51° 06' 00" E	6.4	0123	802.748.3
0123	N 10° 15' 30" E	1.0	0124	802.748.3
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0129	N 10° 15' 30" E	1.0	0130	802.748.3
0130	N 51° 06' 00" E	6.4	0131	802.748.3
0131	N 10° 15' 30" E	1.0	0132	802.748.3
0132	N 51° 06' 00" E	6.4	0133	802.748.3
0133	N 10° 15' 30" E	1.0	0134	802.748.3
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0137	N 10° 15' 30" E	1.0	0138	802.748.3
0138	N 51° 06' 00" E	6.4	0139	802.748.3
0139	N 10° 15' 30" E	1.0	0140	802.748.3
0140	N 51° 06' 00" E	6.4	0141	802.748.3
0141	N 10° 15' 30" E	1.0	0142	802.748.3
0142	N 51° 06' 00" E	6.4	0143	802.748.3
0143	N 10° 15' 30" E	1.0	0144	802.748.3
0144	N 51° 06' 00" E	6.4	0145	802.748.3
0145	N 10° 15' 30" E	1.0	0146	802.748.3
0146	N 51° 06' 00" E	6.4	0147	802.748.3
0147	N 10° 15' 30" E	1.0	0148	802.748.3
0148	N 51° 06' 00" E	6.4	0149	802.748.3
0149	N 10° 15' 30" E	1.0	0150	802.748.3
0150	N 51° 06' 00" E	6.4	0151	802.748.3
0151	N 10° 15' 30" E	1.0	0152	802.748.3
0152	N 51° 06' 00" E	6.4	0153	802.748.3
0153	N 10° 15' 30" E	1.0	0154	802.748.3
0154	N 51° 06' 00" E	6.4	0155	802.748.3
0155	N 10° 15' 30" E	1.0	0156	802.748.3
0156	N 51° 06' 00" E	6.4	0157	802.748.3
0157	N 10° 15' 30" E	1.0	0158	802.748.3
0158	N 51° 06' 00" E	6.4	0159	802.748.3
0159	N 10° 15' 30" E	1.0	0160	802.748.3
0160	N 51° 06' 00" E	6.4	0161	802.748.3
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0178	N 51° 06' 00" E	6.4	0179	802.748.3
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0187	N 10° 15' 30" E	1.0	0188	802.748.3
0188	N 51° 06' 00" E	6.4	0189	802.748.3
0189	N 10° 15' 30" E	1.0	0190	802.748.3
0190	N 51° 06' 00" E	6.4	0191	802.748.3
0191	N 10° 15' 30" E	1.0	0192	802.748.3
0192	N 51° 06' 00" E	6.4	0193	802.748.3
0193	N 10° 15' 30" E	1.0	0194	802.748.3
0194	N 51° 06' 00" E	6.4	0195	802.748.3
0195	N 10° 15' 30" E	1.0	0196	802.748.3
0196	N 51° 06' 00" E	6.4	0197	802.748.3
0197	N 10° 15' 30" E	1.0	0198	802.748.3
0198	N 51° 06' 00" E	6.4	0199	802.748.3
0199	N 10° 15' 30" E	1.0	0200	802.

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SITE MAP / EXCLUSION AREAS
MEMPHIS DEPOT
MEMPHIS, TENNESSEE

Sheet
reference
number

B-1

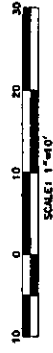




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Date: 01-12-82		Date: 12-12-82		Date: 12-12-82		Date: 12-12-82	

SITE 1 - CANS AREA
MEMPHIS DEPOT
MEMPHIS, TENNESSEE

Sheet
reference
number
B-2



SITE 1 - EAST AREA

MAY 11

POINT	BEARING	DISTANCE	POINT	NORTH	EAST
1000	S 41° 42' W	6.7	1001	281° 42' E	6.7
1001	S 41° 42' W	6.7	1002	281° 42' E	6.7
1002	S 41° 42' W	6.7	1003	281° 42' E	6.7
1003	S 41° 42' W	6.7	1004	281° 42' E	6.7
1004	S 41° 42' W	6.7	1005	281° 42' E	6.7
1005	S 41° 42' W	6.7	1006	281° 42' E	6.7
1006	S 41° 42' W	6.7	1007	281° 42' E	6.7
1007	S 41° 42' W	6.7	1008	281° 42' E	6.7
1008	S 41° 42' W	6.7	1009	281° 42' E	6.7
1009	S 41° 42' W	6.7	1010	281° 42' E	6.7
SO FEET 111					

MAY 12

POINT	BEARING	DISTANCE	POINT	NORTH	EAST
1010	S 41° 42' W	6.7	1011	281° 42' E	6.7
1011	S 41° 42' W	6.7	1012	281° 42' E	6.7
1012	S 41° 42' W	6.7	1013	281° 42' E	6.7
1013	S 41° 42' W	6.7	1014	281° 42' E	6.7
1014	S 41° 42' W	6.7	1015	281° 42' E	6.7
1015	S 41° 42' W	6.7	1016	281° 42' E	6.7
1016	S 41° 42' W	6.7	1017	281° 42' E	6.7
1017	S 41° 42' W	6.7	1018	281° 42' E	6.7
1018	S 41° 42' W	6.7	1019	281° 42' E	6.7
1019	S 41° 42' W	6.7	1020	281° 42' E	6.7
1020	S 41° 42' W	6.7	1021	281° 42' E	6.7
1021	S 41° 42' W	6.7	1022	281° 42' E	6.7
1022	S 41° 42' W	6.7	1023	281° 42' E	6.7
1023	S 41° 42' W	6.7	1024	281° 42' E	6.7
1024	S 41° 42' W	6.7	1025	281° 42' E	6.7
1025	S 41° 42' W	6.7	1026	281° 42' E	6.7
1026	S 41° 42' W	6.7	1027	281° 42' E	6.7
1027	S 41° 42' W	6.7	1028	281° 42' E	6.7
1028	S 41° 42' W	6.7	1029	281° 42' E	6.7
1029	S 41° 42' W	6.7	1030	281° 42' E	6.7
1030	S 41° 42' W	6.7	1031	281° 42' E	6.7
1031	S 41° 42' W	6.7	1032	281° 42' E	6.7
1032	S 41° 42' W	6.7	1033	281° 42' E	6.7
1033	S 41° 42' W	6.7	1034	281° 42' E	6.7
1034	S 41° 42' W	6.7	1035	281° 42' E	6.7
1035	S 41° 42' W	6.7	1036	281° 42' E	6.7
1036	S 41° 42' W	6.7	1037	281° 42' E	6.7
1037	S 41° 42' W	6.7	1038	281° 42' E	6.7
1038	S 41° 42' W	6.7	1039	281° 42' E	6.7
1039	S 41° 42' W	6.7	1040	281° 42' E	6.7
1040	S 41° 42' W	6.7	1041	281° 42' E	6.7
1041	S 41° 42' W	6.7	1042	281° 42' E	6.7
1042	S 41° 42' W	6.7	1043	281° 42' E	6.7
1043	S 41° 42' W	6.7	1044	281° 42' E	6.7
1044	S 41° 42' W	6.7	1045	281° 42' E	6.7
1045	S 41° 42' W	6.7	1046	281° 42' E	6.7
1046	S 41° 42' W	6.7	1047	281° 42' E	6.7
1047	S 41° 42' W	6.7	1048	281° 42' E	6.7
1048	S 41° 42' W	6.7	1049	281° 42' E	6.7
1049	S 41° 42' W	6.7	1050	281° 42' E	6.7
SO FEET 121					



US Army
Corps of Engineers
Burlington, D

US Army Corps
of Engineers
Huntsville Division

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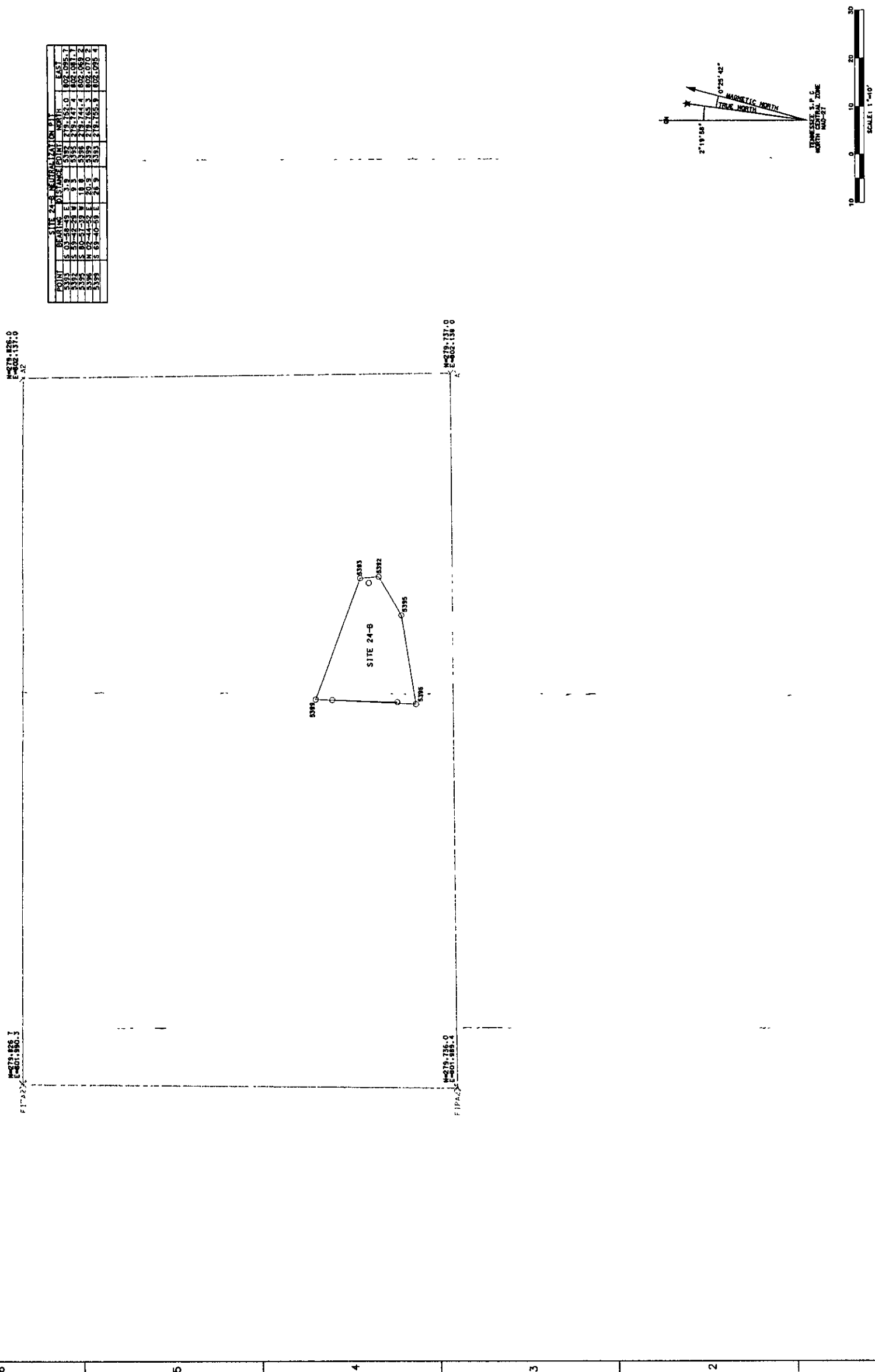
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2014 INTERNATIONAL
2014 BEAUMONT CIRCLE
ASHBURN, VA 20147-60002

CONTRACT No: DACAB7-97-D-0008
ORDER No 0012

SITE 24-B NEUTRALIZATION AREA
MEMPHIS DEPOT
MEMPHIS, TENNESSEE

Sheet
reference
number-
B-4



APPENDIX C

WASTE DISPOSAL REQUESTS AND CERTIFICATIONS

DRAFT

WASTE DISPOSAL CERTIFICATIONS

DRAFT



Waste Tracking Report

June 6, 2001
Page 1

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02770-NB321 Gen Sign Date: 04/19/01 Date Received: 04/20/01

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A	Profile No: CH179887	Manifested Qty:	27 DM	1485 G			M041
2100185	A22K	428	LBS	Incinerated		05/11/01	M042
2100186	A22K	428	LBS	Incinerated		05/11/01	M042
2100187	A22K	428	LBS	Incinerated		05/11/01	M042
2100188	A22K	428	LBS	Incinerated		05/11/01	M042
2100189	A22K	424	LBS	Incinerated		05/11/01	M042
2100190	A22K	424	LBS	Incinerated		05/11/01	M042
2100191	A22K	424	LBS	Incinerated		05/11/01	M042
2100192	A22K	424	LBS	Incinerated		05/11/01	M042
2100193	A22K	417	LBS	Incinerated		05/11/01	M042
2100194	A22K	417	LBS	Incinerated		05/11/01	M042
2100195	A22K	417	LBS	Incinerated		05/11/01	M042
2100196	A22K	417	LBS	Incinerated		05/11/01	M042
2100197	A22K	438	LBS	Incinerated		05/11/01	M042
2100198	A22K	438	LBS	Incinerated		05/11/01	M042
2100199	A22K	438	LBS	Incinerated		05/11/01	M042
2100200	A22K	438	LBS	Incinerated		05/11/01	M042
2100201	A22K	423	LBS	Incinerated		05/11/01	M042
2100202	A22K	423	LBS	Incinerated		05/11/01	M042

Drum 1 yd³ Boxes

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Waste Tracking Report

June 6, 2001
Page 2

DEF025 TN4210020570 to Clean Harbors - Kimball, NE (Cont.)

TN02770-NB321002 (Cont.)

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line 11A	Profile No	CH179887	(cont.)				
2100203	A22K	423	LBS	Incinerated		05/11/01	M042
2100204	A22K	423	LBS	Incinerated		05/11/01	M042
2100205	A22K	427	LBS	Incinerated		05/11/01	M042
2100206	A22K	427	LBS	Incinerated		05/11/01	M042
2100207	A22K	427	LBS	Incinerated		05/11/01	M042
2100208	A22K	427	LBS	Incinerated		05/11/01	M042
2100209	A22K	448	LBS	Incinerated		05/11/01	M042
2100210	A22K	448	LBS	Incinerated		05/11/01	M042
2100211	A22K	448	LBS	Incinerated		05/11/01	M042

Line: 11B	Profile No: CH179886	Manifested Qty: 5 DM	265 G	M041
2100212	A22K	429	LBS	Incinerated
2100213	A22K	429	LBS	Incinerated
2100214	A22K	429	LBS	Incinerated
2100215	A22K	429	LBS	Incinerated
2100216	A22K	435	LBS	Incinerated

Line: 11C	Profile No: CH179885	Manifested Qty: 9 DM	495 G	M041
2100217	A22K	425	LBS	Incinerated
2100218	A22K	425	LBS	Incinerated
2100219	A22K	425	LBS	Incinerated

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Waste Tracking Report

June 6, 2001
Page 3

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DEF025 TN4210020570 to Clean Harbors - Kimball, NE (Cont.)

TN02770-NB321002		(Cont.)				
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	M-Code
Line	11C	Profile No		CH179885	(cont.)	
2100220	A22K	425	LBS	Incinerated		05/11/01 M042
2100221	A22K	433	LBS	Incinerated		05/11/01 M042
2100222	A22K	433	LBS	Incinerated		05/11/01 M042
2100223	A22K	433	LBS	Incinerated		05/11/01 M042
2100224	A22K	433	LBS	Incinerated		05/11/01 M042
2100225	A22K	436	LBS	Incinerated		05/11/01 M042



Certificate of Disposal

June 6, 2001
Page 4

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02770-NB321002

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Jessie Page
Title: sales support

Date: 6-6-01

654 135

Waste Tracking Report



TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02729-NB318 Gen Sign Date: 04/16/01 Date Received: 04/17/01			
Drum No	Code	Qty UOM	M-Code
Line: 11A	Profile No: CH190136B	Manifested Qty: 1 CM	20 Y M043

In Inventory

2095401

25 yd³ Roll off containers



Certificate of Disposal

Clean Harbors - Kimball, NE

5 miles South of Kimball on Highway 71

Kimball, NE 69145

NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02729-NB318963

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed. Andrew Page

Title. sales support

Date: 6-6-01

654 137



Waste Tracking Report

June 6, 2001
Page 1

654 138

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A			Profile No: CH190136B	Manifested Qty: 1 CM	20 Y		M043

2095399 In Inventory



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513
Certificate of Treatment/Disposal - Storage and Transfer

TN02731-NB318963

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Judith Page

Title: sales support

Date: 6-6-01

654

139



Waste Tracking Report

June 6, 2001

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654 140

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI-Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02732-NB318		Gen Sign Date: 04/16/01		Date Received: 04/17/01	
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out Date M-Code
Line: 11A .		Profile No: CH190136B		Manifested Qty: 1 CM	20 Y M043
2095339				Incinerated	04/21/01 M042
				Incinerated	04/20/01 M042



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02732-NB318963

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Judith Page

Title: sales support

Date: 6-6-01

654

141



Waste Tracking Report

June 6, 2001
Page 1

654 142

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02733-NB318 Gen Sign Date: 04/18/01 Date Received: 04/19/01					
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out Date M-Code
Line: 11A	Profile No: CH190136B	Manifested Qty: 1	CM	20 Y	M043
2098334	In Inventory				



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02733-NB318965

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Andrew Page Date: 6-6-01

Title: sales support

654 143



Waste Tracking Report

June 6, 2001
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654 144

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Manifest No:	TN02734-NB318	Gen Sign Date:	04/18/01	Date Received:	04/19/01			
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code	
Line: 11A		Profile No:	CH190136B	Manifested Qty:	1	CM	20 Y	M043

In Inventory

2098228



June 6, 2001
Page 2

Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02734-NB318965

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Lindsey Page

Title: sales support

Date: 6-6-01

654

145



Waste Tracking Report

June 6, 2001
Page 1

654 146

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Manifest No:	TN02735-NB318	Gen Sign Date:	04/18/01	Date Received:	04/19/01	Disposal Site	Manifest Out	Date	M-Code
Drum No	Code	Qty	UOM						
Line: 11A		Profile No:	CH190136B	Manifested Qty:	1	CM	20	Y	M043

2098948 In Inventory



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE

5 miles South of Kimball on Highway 71

Kimball, NE 69145

NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02735-NB318965

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c)

Signed: _____

Title: _____

Andrew Page
Area Support

Date: _____

6-6-01

654

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Waste Tracking Report

June 6, 2001
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654 148

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A			Profile No: CH190136B	Manifested Qty: 1 CM	20 Y		M043

2099963 In Inventory



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02736-NB318965

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Andrew Page Date: 6-6-01

Title: sales support

654 149



Waste Tracking Report

June 6, 2001
Page 1

654 150

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02737-NB318		Gen Sign Date: 04/18/01		Date Received: 04/19/01	
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out Date M-Code
Line: 11A		Profile No: CH190136B	Manifested Qty: 1	CM	20 Y M043
2098898 In Inventory					



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02737-NB318965

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Judith Page

Title: Area Support

Date: 6-6-01



Waste Tracking Report

June 6, 2001
Page 1

654 159

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01
CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02738-NB318		Gen Sign Date: 04/18/01		Date Received: 04/19/01	
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out
Date	M-Code				
Line: 11A	Profile No: CH190136B	Manifested Qty: 1	CM	20 Y	M043
2098925	Incinerated				
				05/31/01	M042



June 6, 2001
Page 2

Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02738-NB318965

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Andrew Page

Title: Sales Support

Date: 6-6-01

654 153



June 6, 2001
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654

154

Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02738-NB318 Gen Sign Date: 04/19/01 Date Received: 04/21/01

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
---------	------	-----	-----	---------------	--------------	------	--------

Line: 11A	Profile No: CH190136B	Manifested Qty: 1 CM	20 Y	M043
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In Inventory



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02738-NB318966

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Audrey Page
Title: Sales support

Date: 6-6-01

654 155

Waste Tracking Report



TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02741-NB318		Gen Sign Date: 04/23/01	Date Received: 04/24/01		
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out Date M-Code
Line: 11A		Profile No: CH190136B	Manifested Qty: 1	CM	20 Y M043

In Inventory

2103203



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02741-NB318966

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c)

Signed: _____

Title: _____

Date: 6-6-01

654 157



Waste Tracking Report

June 6, 2001
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654 158

TN4210020570	DEF025	Defense Dist Depot Memphis	Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01			
CHI Receiving Facility: Clean Harbors - Kimball, NE			
<hr/>			
Mnfst No: TN02742-NB318		Date Received: 04/24/01	
Drum No		Disposal Site	
Code	Qty	UOM	M-Code
<hr/>			
Line: 11A	Profile No: CH190136B	Manifested Qty: 1 CM	20 Y M043
<hr/>			
2103257 In Inventory			



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02742-NB318966

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Andrew Page

Title: Sales support

Date: 6-6-01

654

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Waste Tracking Report

June 6, 2001

Page 1

654

160

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02743-NB318 Gen Sign Date: 04/23/01		Date Received: 04/24/01	
Drum No	Code	Qty	UOM
Disposal Site	Manifest Out	Date	M-Code
Line: 11A	Profile No: CH190136B	Manifested Qty: 1 CM	20 Y
			M043

In Inventory

2103229



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02743-NB318966

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Judith Page

Title: Sales Support

Date: 6-6-01



Waste Tracking Report

June 6, 2001
Page 1

654 162

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02744-NB318			Gen Sign Date: 04/23/01		Date Received: 04/24/01	
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date
Line: 11A		Profile No: CH190136B		Manifested Qty: 1 CM	20 Y	M043
2103994				In Inventory		



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02744-NB318966

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Andrew Page

Title: Sales support

Date: 6-6-01

Waste Tracking Report



TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02745-NB318		Gen Sign Date: 04/23/01	Date Received: 04/24/01		
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out Date M-Code
Line: 11A		Profile No: CH190136B	Manifested Qty: 1	CM	20 Y M043

In Inventory

2103354



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02745-NB318966

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Judith Page

Title: sales support

Date: 6-6-01



Waste Tracking Report

June 6, 2001
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654 166

TN4210020570	DEF025	Defense Dist Depot Memphis	Memphis, TN
		Manifest Dates: 01/01/01 to 12/31/01	
CHI Receiving Facility: Clean Harbors - Kimball, NE			
<hr/>			
Mnfst No: TN02740-NB320		Gen Sign Date: 04/23/01	
		Date Received: 04/24/01	
Drum No	Code	Qty	UOM
		Disposal Site	Manifest Out
		Date	M-Code
<hr/>			
Line: 11A	Profile No: CH190136B	Manifested Qty: 1 CM	'20 Y
			M043
<hr/>			
2103395			
In Inventory			



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02740-NB320289

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: _____

Title: _____

Date: 6-6-01



Waste Tracking Report

June 6, 2001
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654 168

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02746-NB318			Gen Sign Date: 04/25/01		Date Received: 04/26/01		
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A			Profile No: CH190136B	Manifested Qty: 1 CM	20 Y		M043
2108740				Incinerated		05/29/01	M042



June 6, 2001
Page 2

Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513
Certificate of Treatment/Disposal - Storage and Transfer

TN02746-NB318967

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Timothy Page Date: 6-6-01
Title: Sales Support



Waste Tracking Report

June 6, 2001
Page 1

654 170

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02747-NB318 Gen Sign Date: 04/25/01 Date Received: 04/25/01
Drum No Code Qty UOM Disposal Site Manifest Out Date M-Code

Line: 11A Profile No: CH190136B Manifested Qty: 1 CM 20 Y M043

2108673 In Inventory



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02747-NB318967

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: _____

Title: _____

Date: 6-6-01

654 171



Waste Tracking Report

June 6, 2001
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TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02748-NB318 Gen Sign Date: 04/25/01				Date Received: 04/26/01			
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A	Profile No: CH190136B		Manifested Qty: 1		CM	25 Y	M043
2109023	Incinerated				05/31/01 M042		



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE

5 miles South of Kimball on Highway 71

Kimball, NE 69145

NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02748-NB318967

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c)

Signed: _____

Title: _____

Date: 6-6-01

654 173



Waste Tracking Report

June 6, 2001
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174

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02749-NB318		Gen Sign Date: 04/25/01	Date Received: 04/26/01		
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out Date M-Code
Line: 11A		Profile No: CH190136B	Manifested Qty: 1	CM	25 Y M043
2108781			Incinerated		05/29/01 M042



June 6, 2001
Page 2

Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02749-NB318967

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Anthony Page Date: 6-6-01
Title: Quality Support

654 175

Waste Tracking Report



TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02750-NB318			Gen Sign Date: 04/25/01		Date Received: 04/26/01		
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A			Profile No: CH190136B	Manifested Qty: 1	CM	25 Y	M043
2109220			Incinerated				05/31/01 M042



June 6, 2001
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Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02750-NB318967

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: _____

Title: _____

Date: 6-6-01

654 177

654 178

June 6, 2001
Page 1

Waste Tracking Report



Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

DEF025

TN4210020570

CHI Receiving Facility: Clean Harbors - Kimball, NE

Manifest No: TN02728-NB318 Gen Sign Date: 04/16/01		Date Received: 04/17/01	
Drum No	Code	Qty	UOM
Line: 11A	Profile No: CH190136B	Manifested Qty: 1 CM	20 Y
2095397		Incinerated	
		04/21/01	M042

M043



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02728-NB318963

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c)

Signed: Andrew Page

Title: Area Support

Date: 6-6-01



Waste Tracking Report

June 6, 2001
Page 1

654 180

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02730-NB318		Gen Sign Date: 04/16/01	Date Received: 04/17/01			
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date
						M-Code

Line: 11A	Profile No: CH190136B	Manifested Qty: 1	CM	20	Y	M043
-----------	-----------------------	-------------------	----	----	---	------

2095395 In Inventory



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02730-NB318963

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Andrew Page Date: 6-6-01
Title: sales support



Waste Tracking Report

June 6, 2001
Page 1

654 182

TN4210020570 DEF025 Defense Dist Depot Memphis Memphis, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02727-NB318 Gen Sign Date: 04/16/01 Date Received: 04/17/01					
Drum No	Code	Qty	UOM	Disposal Site	Manifest Out Date M-Code
Line: 11A	Profile No: CH190136B	Manifested Qty: 1	CM	20 Y	M043
Incinerated					04/21/01 M042

2095422



Certificate of Disposal

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02727-NB318963

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Andrew Page Date: 6-6-01

Title: sales support



Waste Tracking Report

June 6, 2001
Page 1

TND000772186 PO0225 Pollution Control Industries Millington, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Manifest No: TN02775-NB320 Gen Sign Date: 04/19/01 Date Received: 04/20/01

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line 11A		Profile No: CH179888B		Manifested Qty: 1 CM	25 Y		M043
2100338				Incinerated		05/28/01	M042
				Incinerated		05/29/01	M042

654 184

25 yd³ Roll-off containers at PeZ



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02775-NB320496

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: _____

Title: _____

Andrew Page

Sales Support

Date: _____

654 185



Waste Tracking Report

June 6, 2001
Page 1

TND000772186 PO0225 Pollution Control Industries Millington, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Manifest No: TN02772-NB320 Gen Sign Date: 04/19/01 Date Received: 04/20/01

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A			Profile No: CH179888B	Manifested Qty: 1 CM	25 Y		M043
2100273			Incinerated				05/23/01 M042

654 186



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02772-NB320496

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c)

Signed: Andrew Page

Title: sales support

Date: 6-6-01

654 187



Waste Tracking Report

June 6, 2001
Page 1

TND000772186 PO0225 Pollution Control Industries Millington, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Manifest No: TN02774-NB320 Gen Sign Date: 04/19/01 Date Received: 04/21/01

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A			Profile No: CH179888B	Manifested Qty: 1 CM	25 Y		M043
2102281			Incinerated			05/18/01	M042
			Incinerated			05/15/01	M042
			Incinerated			05/17/01	M042
			Incinerated			05/19/01	M042

654 188



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02774-NB320496

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Judith Page

Title: Area Support

Date: 6-6-01

654 189



Waste Tracking Report

TND000772186 PO0225 Pollution Control Industries Millington, TN
Manifest Dates: 01/01/01 to 12/31/01

CHI Receiving Facility: Clean Harbors - Kimball, NE

Mnfst No: TN02773-NB320 Gen Sign Date: 04/19/01 Date Received: 04/20/01

Drum No	Code	Qty	UOM	Disposal Site	Manifest Out	Date	M-Code
Line: 11A			Profile No: CH179888B	Manifested Qty: 1 CM	25 Y		M043
2100415			Incinerated				05/29/01 M042



Certificate of Disposal

June 6, 2001
Page 2

Clean Harbors - Kimball, NE
5 miles South of Kimball on Highway 71
Kimball, NE 69145
NED981723513

Certificate of Treatment/Disposal - Storage and Transfer

TN02773-NB320496

The above described waste, received at the Clean Harbors facility listed above pursuant to the manifest(s) listed above, has been treated and/or disposed of by Clean Harbors, or another licensed facility approved by Clean Harbors, in accordance with applicable federal and state laws and regulations. Any waste received by Clean Harbors and subsequently shipped to another licensed facility has been or shall be identified as being generated by Clean Harbors in accordance with 40CFR 264.71(c).

Signed: Shirley Page

Title: Sales Support

Date: 6-6-01

654 191

WM

Waste Management, Inc.
Emelle Facility
P.O. Box 55
Emelle, Alabama 35459-005
(205)652-9721

Manifest Document Number: 99515

Site Information

MEMPHIS DEPOT CARETAKER
2163 AIRWAYS BLVD
BLDG 144
MEMPHIS, TN 38114-5210
Attn: MIKE LEE

DRMO-MEMPHIS DEPOT CARETAKER
2163 AIRWAYS BLVD
BLDG 144
MEMPHIS, TN 38114-5210

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received waste material from
DRMO-MEMPHIS DEPOT CARETAKER

described on Alabama Hazardous Waste Manifest Number CWMA 0000913473

Chemical Waste Management, Inc. hereby certifies that the Non "PCB" line item(s) was/were disposed of on/or before the date(s) shown below in accordance with State and Federal Regulations.


Dorothy Oliver, Recordkeeping and Reporting Supervisor
June 25, 2001

<u>LN</u>	<u>Profile</u>	<u>Quantity</u>	<u>Disposal Date</u>	<u>Description</u>
1	CT7992	1	06/25/2001	NON-REGULATED MATERIAL

Plant of 30 yd³ End Dumps

Jul-10-01 11:19am From-CWM ACCOUNTING

+2056528102

T-901 P.03/06 F-788

WM

Waste Management, Inc.
Emelle Facility
P.O. Box 55
Emelle, Alabama 35459-005
(205)652-9721

Manifest Document Number: 02780

Site Information

MEMPHIS DEPOT CARETAKER
2163 AIRWAYS BLVD
BLDG 144
MEMPHIS, TN 38114-5210

DRMO-MEMPHIS DEPOT CARETAKER
2163 AIRWAYS BLVD
BLDG 144
MEMPHIS, TN 38114-5210

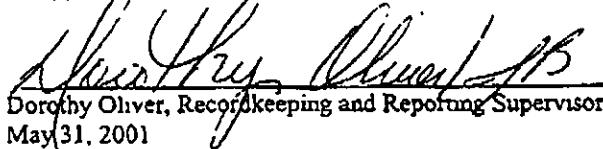
Attn: MIKE LEE

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received waste material from
DRMO-MEMPHIS DEPOT CARETAKER

described on Alabama Hazardous Waste Manifest Number CWMA 0000910779

Chemical Waste Management, Inc. hereby certifies that the Non "PCB" line item(s) was/were disposed of on/or before the date(s) shown below in accordance with State and Federal Regulations.


Dorothy Oliver, Recordkeeping and Reporting Supervisor
May 31, 2001

<u>LN</u>	<u>Profile</u>	<u>Quantity</u>	<u>Disposal Date</u>	<u>Description</u>
1	CT1645	28	05/15/2001	NON-REGULATED MATERIAL

WM

Waste Management, Inc.
Emelle Facility
P.O. Box 55
Emelle, Alabama 35459-005
(205)652-9721

Manifest Document Number: 02792

DRMO-MEMPHIS
2163 AIRWAYS BLVD
BLDG 209
MEMPHIS, TN 38114-5208

Site Information


DRMO-MEMPHIS
2163 AIRWAYS BLVD
BLDG 209
MEMPHIS, TN 38114-5208

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received waste material from
DRMO-MEMPHIS

described on Alabama Hazardous Waste Manifest Number CWMA 0000910781

Chemical Waste Management, Inc. hereby certifies that the Non "PCB" line item(s) was/were disposed of on/or before the date(s) shown below in accordance with State and Federal Regulations.


Dorothy Oliver, Recordkeeping and Reporting Supervisor
April 30, 2001

<u>LN</u>	<u>Profile</u>	<u>Quantity</u>	<u>Disposal Date</u>	<u>Description</u>
1	CT1637	1	04/27/2001	RQ, HAZARDOUS WASTE, SOLID, N.O.S

Jul-10-01 11:19am From-CWM ACCOUNTING

+2056528102

T-901 P 05/06 F-788

WM

Waste Management, Inc.
Emelle Facility
P.O. Box 55
Emelle, Alabama 35459-005
(205)652-9721

Manifest Document Number: 02794

Site Information

DRMO-MEMPHIS DEPOT CARETAKER
2163 AIRWAYS BLVD
BLDG 209
MEMPHIS, TN 38114-5208

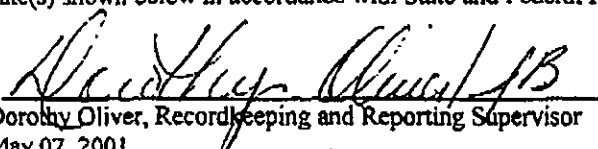
DRMO-MEMPHIS
2163 AIRWAYS BLVD
BLDG 209
MEMPHIS, TN 38114-5208

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received waste material from
DRMO-MEMPHIS DEPOT CARETAKER

described on Alabama Hazardous Waste Manifest Number CWMA 0000910783

Chemical Waste Management, Inc. hereby certifies that the Non "PCB" line item(s) was/were disposed of on/or before the date(s) shown below in accordance with State and Federal Regulations.


Dorothy Oliver, Recordkeeping and Reporting Supervisor
May 07, 2001

<u>LN</u>	<u>Profile</u>	<u>Quantity</u>	<u>Disposal Date</u>	<u>Description</u>
1	CT1637	1	05/04/2001	RQ, HAZARDOUS WASTE, SOLID, N.O.S

WM

Waste Management, Inc.
Emelle Facility
P.O. Box 55
Emelle, Alabama 35459-005
(205)652-9721

Manifest Document Number: 02795

Site Information

DRMO-MEMPHIS DEPOT CARETAKER
2163 AIRWAYS BLVD
BLDG 209
MEMPHIS, TN 38114-5208

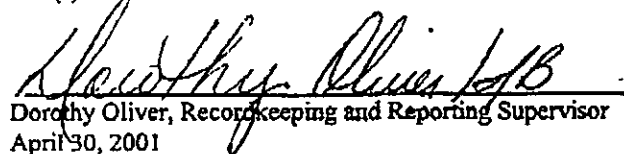
DRMO-MEMPHIS DEPOT CARETAKER
2163 AIRWAYS BLVD
BLDG 209
MEMPHIS, TN 38114-5208

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. (ALD000622464) has received waste material from
DRMO-MEMPHIS DEPOT CARETAKER

described on Alabama Hazardous Waste Manifest Number CWMA 0000910784

Chemical Waste Management, Inc. hereby certifies that the Non "PCB" line item(s) was/were disposed of on/or before the date(s) shown below in accordance with State and Federal Regulations.


Dorothy Oliver, Recordkeeping and Reporting Supervisor
April 30, 2001

<u>LN</u>	<u>Profile</u>	<u>Quantity</u>	<u>Disposal Date</u>	<u>Description</u>
1	CT1637	1	04/30/2001	RQ, HAZARDOUS WASTE, SOLID, N O.S

Safety-Kleen (Colfax), Inc.
EPA I.D. #LAD981055791
3763 Hwy 471, Colfax, LA 71417
(318) 627-3443, (800) 628-3443,
(318) 627-3448 (fax)

CERTIFICATION OF DISPOSAL

On behalf of Safety-Kleen (Colfax), Inc., the waste listed on Louisiana Manifest #LAA6673492 received from Memphis Depot Caretaker (EPA I.D.#TN4210020570) located at Memphis, TN April 26, 2001 was disposed of in accordance with all local, state, and federal regulations.

Signed: David Lasyone Date: 5/30/01
David Lasyone

Bomb shell casings
P.

Safety-Kleen (Colfax), Inc.
EPA I.D. #LAD981055791
3763 Hwy 471, Colfax, LA 71417
(318) 627-3443, (800) 628-3443,
(318) 627-3448 (fax)

CERTIFICATION OF DISPOSAL

On behalf of Safety-Kleen (Colfax), Inc., the waste listed on Louisiana Manifest #LAA6673495 received from Memphis Depot Caretaker (EPA I.D.#TN4210020670) located at Memphis, TN May 2, 2001 was disposed of in accordance with all local, state, and federal regulations.

Signed: David Lasyone Date: 5/30/01
David Lasyone

Burrer tubes

Fill Dirt Soil

DRAFT



UXB International, Inc. Demining - Ordnance and Explosive Waste Services

Mr. Frank Johnson
Project Manager
UXB International Inc.
1325 Landfair Dr. #103
Germantown, TN 38138

29 March 2001

Subject: Soil samples:

MCIP/1082/Total/001
MCIP/1071/GRAB/01

Reference: Environmental Testing and Consulting Labs Test reports 0103736-01 and
0103344-01 for Dunn Field Sample #s

MCIP/1082/Total/001
MCIP/1071/GRAB/01

Dear Frank:

I have reviewed the set of analytical results transmitted to me from the referenced soil samples taken from the Dunn Field site. The sample results were evaluated against the Region 9 Preliminary Remediation Goals (PRGs) 1999 criterion for Industrial Soils (as modified per agreement) which can be found on the Web at <http://www.epa.gov/region09/waste/sfund/prg/> and 40 CFR 261.24 Table 1, which can be found at <http://frwebgate.access.gpo.gov/>. Modifications to the criterion included adjusting the following chemical's acceptable limits to the following concentrations:

Aluminum	24,000 mg/kg
Antimony	7 mg/kg
Arsenic	20 mg/kg
Dioxin	10 mg/kg
Iron	37,000 mg/kg
Lead	400 mg/kg
Manganese	1,300 mg/kg

All of the sample reports for TCLP Metals, Volatiles, Semivolatiles, Pesticides and Herbicides reported results in mg/L of lechate (a TCLP extraction was used to prepare the samples) rather than mg/kg of sample as called out in the PRG documents and modifications listed above. Thus in order to compare the results of most of the tests to the PRGs it is necessary to multiply mg/L of lechate results by 20 to arrive at equivalent mg/kg of sample results. This procedure corrects for the dilution factor inherent in a TCLP extraction. The procedure also assumes that all of the chemical under test in the soil sample is leachable (i.e., is not irreversibly bound to the soil matrix.).

I understand that these samples were representative samples that were both taken from the same soil pile and that this soil is to be used as backfill material for the pits which have been excavated at the Dunn Field site. Metals, volatiles, Semivolatiles, pesticides, and herbicides, were all performed on the MCIP/1071/GRAB/01 sample, while the Cyanide/sulfide reactivity, pH, PAHs and flashpoint were performed on the MCIP/1082/Total/001 sample.

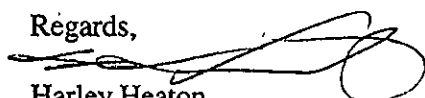
The following samples were reviewed and approved as noted:

Sample ID	Approved (Y/N)	
MCIP/1082/Total/001	Y*	
MCIP/1071/GRAB/01	Y	

* Please note that some PAHs were found in this soil sample. In particular Benzo(b)fluoranthene, Benzo(a)fluoranthene, Benzo(g,h,i)perylene, Chrysene, Fluroanthene, Indeno(1,2,3-cd)pyrene, phenantrene and pyrene were all found at levels above the detection limit, most of them in the low parts per billion range. These chemicals taken together normally indicate that someone built a fire and burned some wood, coal or tar on or in that soil at one time or another. Alternatively a forest fire may have caused these chemicals in these samples. The chemicals noted are not regulated by the EPA and they do not appear on the Region 9 Preliminary Remediation Goals (PRGs) 1999 criterion for Industrial Soils (as modified per agreement) or 40 CFR 261.24 Table 1. However, caution is indicated if you desire to use this soil for backfill material.

If you need additional information, please call me at the number below.

Regards,



Harley Heaton
Director, AEDA Technologies

UXB International Inc.

Dunn Field, Memphis, TN

Fax

To: Harley Henton From: Jim Dunkle
Fax: _____ Pages: 12 Including Cover
Phone: X-646 Date: 28 Mar 01
Re: _____ CC: _____

☒ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

MCIP/1082/Total/001 Has Priority the
DF/24-A And DF/24-B still Pending
TCLPs. MCIP = Fill Dirt

Thanks Jim

Mar 28 01 04:19p UXB International
03/28/01 WED 18:15 FAX

BEST AVAILABLE COPY
15014-4280

654 203
P-2
0011

03/28/2001 15:25 9813276334

ETC

PAGE 02

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)317-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**

Date Arrived **03/23/01**
ETC Order Number **0103736**

ETC Lab ID : **0103736-01**
Field ID : **MCIP/1082/Total/001**

Matrix : **SOIL**
Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	BY	METHOD	QC BATCH
Total Cyanide	ND	mg/Kg	1.00	03/27/01	GD	9010B	CY032711
Ignitability/Flashpoint	>96	oC		03/26/01	GD	1010	IG032611
pH - Corrosivity	7.7	SU		03/26/01	TL	9045C	PH032611
Sulfide	ND	mg/Kg	20	03/27/01	TD	9030B	SD032711


Data Validator

ND - Not Detected

654 204

Mar 28 01 04:19p UXB International
03/28/01 WED 18:15 FAX

(901) 745-4280

p.3

0012

03/28/2001 15:25 9013276334

ETC

PAGE 03

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)321-2750Client Name **Innovative Waste Management**Site ID **Dunn Field****P.O. Box 50397**
Summerville, SC 29485-0397

FID #

Date Arrived **03/23/01**
ETC Order Number **0103736**ETC Lab ID **0103736-01**
Field ID : **MCIP/1082/Total/001**Matrix : **SOIL**
Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Volatile Organics				03/26/01	EM	8260B 5035
QC Batch	V403261					
Dilution Factor	1					
Acetone	ND	ug/Kg	40.0			
Benzene	ND	ug/Kg	2.00			
Bromodichloromethane	ND	ug/Kg	2.00			
Bromoform	ND	ug/Kg	2.00			
Bromomethane	ND	ug/Kg	2.00			
2-Butanone (MEK)	ND	ug/Kg	40.0			
Carbon Disulfide	ND	ug/Kg	2.00			
Carbon Tetrachloride	ND	ug/Kg	2.00			
Chlorobenzene	ND	ug/Kg	2.00			
Chlorodibromomethane	ND	ug/Kg	2.00			
Chloroethane	ND	ug/Kg	2.00			
Chloroform	ND	ug/Kg	2.00			
Chloromethane	ND	ug/Kg	2.00			
1,1-Dichloroethane	ND	ug/Kg	2.00			
1,2-Dichloroethane	ND	ug/Kg	2.00			
1,1-Dichloroethene	ND	ug/Kg	2.00			
1,2-Dichloroethene (Total)	ND	ug/Kg	2.00			
1,2-Dichloropropane	ND	ug/Kg	2.00			
cis-1,3-Dichloropropene	ND	ug/Kg	2.00			
trans-1,3-Dichloropropene	ND	ug/Kg	2.00			
Ethylbenzene	ND	ug/Kg	2.00			
2-Hexanone (MBK)	ND	ug/Kg	10.0			
4-Methyl-2-pentanone (MIBK)	ND	ug/Kg	10.0			
Methylene Chloride	ND	ug/Kg	20.0			
Styrene	ND	ug/Kg	2.00			
1,1,2,2-Tetrachloroethane	ND	ug/Kg	2.00			
Tetrachloroethene	ND	ug/Kg	2.00			
Toluene	ND	ug/Kg	2.00			
1,1,1-Trichloroethane	ND	ug/Kg	2.00			
1,1,2-Trichloroethane	ND	ug/Kg	2.00			
Trichloroethene	ND	ug/Kg	2.00			
Vinyl Chloride	ND	ug/Kg	2.00			
Xylenes-m,p	ND	ug/Kg	2.00			
Xylenes-o	ND	ug/Kg	2.00			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	108	70 134
S2 - Toluene-d8	102	85 111
S3 - 4-Bromofluorobenzene	94	81 117
S4 - 1,2-Dichloroethane-d4	110	80 120

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

03/28/2001 15:25 9013276334

ETC

PAGE 04

ENVIRONMENTAL TESTING & CONSULTING, INC.
1924 Walnut Grove Road - Memphis, TN 38111 - (901) 327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**

P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **03/23/01**
ETC Order Number **0103736**

ETC Lab ID **0103736-01**
Field ID **MCIP/1082/Total/001**

Matrix : **SOIL**
Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid						
QC Batch	P04511			03/27/01	PF	8270C 3550B
Dilution Factor	1				03/26/01	
Acenaphthene	8.93J	ug/Kg	67.0			
Acenaphthylene	ND	ug/Kg	67.0			
Anthracene	24.6J	ug/Kg	67.0			
Benzo(a)anthracene	89.3	ug/Kg	67.0			
Benzo(b)fluoranthene	74.4	ug/Kg	67.0			
Benzo(k)fluoranthene	29.0	ug/Kg	67.0			
Benzo(g,h,i)perylene	119	ug/Kg	67.0			
Benzo(a)pyrene	51.1J	ug/Kg	67.0			
Bis(2-chloroethoxy)methane	ND	ug/Kg	170			
Bis(2-chloroethyl)ether	ND	ug/Kg	170			
Bis(2-chloroisopropyl)ether	ND	ug/Kg	170			
Bis(2-ethylhexyl)phthalate	ND	ug/Kg	170			
4-Bromophenyl phenyl ether	ND	ug/Kg	170			
Buryl benzyl phthalate	ND	ug/Kg	170			
4-Chloroaniline	ND	ug/Kg	170			
2-Chloronaphthalene	ND	ug/Kg	170			
4-Chloro-3-methylphenol	ND	ug/Kg	170			
2-Chlorophenol	ND	ug/Kg	170			
4-Chlorophenyl phenyl ether	ND	ug/Kg	170			
Chrysene	102	ug/Kg	67.0			
Dibenzo(a,h)anthracene	ND	ug/Kg	67.0			
Dibenzofuran	ND	ug/Kg	170			
1,2-Dichlorobenzene	ND	ug/Kg	170			
1,3-Dichlorobenzene	ND	ug/Kg	170			
1,4-Dichlorobenzene	ND	ug/Kg	170			
Di-n-butyl phthalate	ND	ug/Kg	170			
3,3'-Dichlorobenzidine	ND	ug/Kg	170			
2,4-Dichlorophenol	ND	ug/Kg	170			
2,6-Dichlorophenol	ND	ug/Kg	170			
Dichthyl phthalate	ND	ug/Kg	170			
2,4-Dimethylphenol	ND	ug/Kg	170			
Dimethyl phthalate	ND	ug/Kg	170			
4,6-Dinitro-2-methylphenol	ND	ug/Kg	170			
2,4-Dinitrophenol	ND	ug/Kg	170			
2,4-Dinitrotoluene	ND	ug/Kg	330			
2,6-Dinitrotoluene	ND	ug/Kg	170			
Di-n-octyl phthalate	ND	ug/Kg	170			
Fluoranthene	257	ug/Kg	67.0			
Fluorene	ND	ug/Kg	67.0			
Hexachlorobenzene	ND	ug/Kg	170			
Hexachlorobutadiene	ND	ug/Kg	170			
Hexachlorocyclopentadiene	ND	ug/Kg	170			
Hexachloroethane	ND	ug/Kg	170			
Indeno(1,2,3-cd)pyrene	103	ug/Kg	67.0			
Isophorone	ND	ug/Kg	170			
2-Methylnaphthalene	ND	ug/Kg	170			
2-Methylphenol (o-cresol)	ND	ug/Kg	170			

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

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ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750Client Name **Innovative Waste Management**Site ID **Dunn Field**P.O. Box 50397
Summerville, SC 29485-0397

PID #

Date Arrived **03/23/01**
ETC Order Number **0103736**ETC Lab ID **0103736-01**
Field ID : **MCIP/1082/Total/001**Matrix : **SOIL**
Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid						
				03/27/01	03/26/01	PF 8270C 3550B
4-Methylphenol (p-cresol)	ND	ug/Kg	170			
Naphthalene	ND	ug/Kg	67.0			
Nitrobenzene	ND	ug/Kg	170			
2-Nitroaniline	ND	ug/Kg	170			
3-Nitroaniline	ND	ug/Kg	170			
4-Nitroaniline	ND	ug/Kg	170			
2-Nitrophenol	ND	ug/Kg	170			
4-Nitrophenol	ND	ug/Kg	170			
N-Nitrosodiphenylamine	ND	ug/Kg	170			
N-Nitrosodipropylamine	ND	ug/Kg	170			
Pentachlorophenol	ND	ug/Kg	170			
Phenanthrene	106	ug/Kg	67.0			
Phenol	ND	ug/Kg	170			
Pyrene	157	ug/Kg	67.0			
1,2,4-Trichlorobenzene	ND	ug/Kg	170			
2,4,5-Trichlorophenol	ND	ug/Kg	170			
2,4,6-Trichlorophenol	ND	ug/Kg	170			
Surrogate Standard						
	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	70		25 110			
S2 - 2-Fluorobiphenyl	83		33 114			
S3 - 4-Terphenyl-d14	102		37 115			
S4 - Phenol-d6	45		11 125			
S5 - 2,4,6-Tribromophenol	55		9 134			
S6 - 2-Fluorophenol	40		10 119			

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

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ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**

Date Arrived **03/23/01**
ETC Order Number **0103738**

ETC Lab ID : **0103738-01**
Field ID : **DF/24-A/1082/Total/001**

Matrix : **SOIL**
Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	BY	METHOD	QC BATCH
Total Cyanide	ND	mg/Kg	1.00	03/27/01	GD	9010B	CY032711
Ignitability/Flashpoint	>96	°C		03/26/01	GD	1070	AG032611
pH - Corrosivity	7.3	SU		03/26/01	TL	9045C	PH032611
Sulfide	ND	mg/Kg	20	03/27/01	TD	9030B	SD032711



Data Validator

ND - Not Detected

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ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901) 327-1750

Client Name **Innovative Waste Management**Site ID **Dunn Field****P.O. Box 58397
Summerville, SC 29485-0397**

PID #

Date Arrived **03/23/01**ETC Order Number **0103738**ETC Lab ID **0103738-01**Field ID : **DF/24-A/1082/Total/001**Matrix : **SOIL**Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid				03/27/01	PF	8270C 3550B
QC Batch	P04511					
Dilution Factor	10					
Acenaphthene	ND	ug/Kg	670			
Acenaphthylene	ND	ug/Kg	670			
Anthracene	ND	ug/Kg	670			
Benzo(a)anthracene	2621	ug/Kg	670			
Benzo(b)fluoranthene	ND	ug/Kg	670			
Benzo(k)fluoranthene	ND	ug/Kg	670			
Benzo(g,h,i)perylene	ND	ug/Kg	670			
Benzo(a)pyrene	ND	ug/Kg	670			
Bis(2-chloroethoxy)methane	ND	ug/Kg	1700			
Bis(2-chloroethyl)ether	ND	ug/Kg	1700			
Bis(2-chloroisopropyl)ether	ND	ug/Kg	1700			
Bis(2-ethylhexyl)phthalate	ND	ug/Kg	1700			
4-Bromophenyl phenyl ether	ND	ug/Kg	1700			
Butyl benzyl phthalate	ND	ug/Kg	1700			
4-Chloroaniline	ND	ug/Kg	1700			
2-Chloronaphthalene	ND	ug/Kg	1700			
4-Chloro-3-methylphenol	ND	ug/Kg	1700			
2-Chlorophenol	ND	ug/Kg	1700			
4-Chlorophenyl phenyl ether	ND	ug/Kg	1700			
Chrysene	2301	ug/Kg	670			
Dibenz(a,h)anthracene	ND	ug/Kg	670			
Dibenzofuran	ND	ug/Kg	1700			
1,2-Dichlorobenzene	ND	ug/Kg	1700			
1,3-Dichlorobenzene	ND	ug/Kg	1700			
1,4-Dichlorobenzene	ND	ug/Kg	1700			
Di-n-butyl phthalate	ND	ug/Kg	1700			
3,3'-Dichlorobenzidine	ND	ug/Kg	1700			
2,4-Dichlorophenol	ND	ug/Kg	1700			
2,6-Dichlorophenol	ND	ug/Kg	1700			
Diethyl phthalate	ND	ug/Kg	1700			
2,4-Dimethylphenol	ND	ug/Kg	1700			
Dimethyl phthalate	ND	ug/Kg	1700			
4,6-Dinitro-2-methylphenol	ND	ug/Kg	1700			
2,4-Dinitrophenol	ND	ug/Kg	3300			
2,4-Dinitrotoluene	ND	ug/Kg	1700			
2,6-Dinitrotoluene	ND	ug/Kg	1700			
Di-n-octyl phthalate	ND	ug/Kg	1700			
Fluoranthene	1,510	ug/Kg	670			
Fluorene	ND	ug/Kg	670			
Hexachlorobenzene	ND	ug/Kg	1700			
Hexachlorobutadiene	ND	ug/Kg	1700			
Hexachlorocyclopentadiene	ND	ug/Kg	1700			
Hexachloroethane	ND	ug/Kg	1700			
Indeno(1,2,3-cd)pyrene	ND	ug/Kg	670			
Isophorone	ND	ug/Kg	1700			
2-Methylnaphthalene	ND	ug/Kg	1700			
2-Methylphenol (o-cresol)	ND	ug/Kg	1700			

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

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ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**

FID #

Date Arrived **03/23/01**
ETC Order Number **0103738**

ETC Lab ID **0103738-01**
Field ID : **DF/24-A/1032/Total/001**

Matrix : **SOIL**
Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid						
				03/27/01		
4-Methylphenol (p-cresol)	ND	ug/Kg	1700		03/26/01	PF 8270C 3550B
Naphthalene	ND	ug/Kg	670			
Nitrobenzene	ND	ug/Kg	1700			
2-Nitroaniline	ND	ug/Kg	1700			
3-Nitroaniline	ND	ug/Kg	1700			
4-Nitroaniline	ND	ug/Kg	1700			
2-Nitrophenol	ND	ug/Kg	1700			
4-Nitrophenol	ND	ug/Kg	1700			
N-Nitrosodiphenylamine	ND	ug/Kg	1700			
N-Nitrosodipropylamine	ND	ug/Kg	1700			
Pentachlorophenol	ND	ug/Kg	1700			
Phenanthrene	382J	ug/Kg	670			
Phenol	ND	ug/Kg	1700			
Pyrene	643J	ug/Kg	670			
1,2,4-Trichlorobenzene	ND	ug/Kg	1700			
2,4,5-Trichlorophenol	ND	ug/Kg	1700			
2,4,6-Trichlorophenol	ND	ug/Kg	1700			
Surrogate Standard						
	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	53		25 110			
S2 - 2-Fluorobiphenyl	66		33 114			
S3 - 4-Terphenyl-d14	107		37 115			
S4 - Phenol-d6	44		11 125			
S5 - 2,4,6-Tribromophenol	49		9 134			
S6 - 2-Fluorophenol	38		10 119			

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

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ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-7750

Client Name **Innovative Waste Management**Site ID **Dunn Field****P.O. Box 50397
Summerville, SC 29485-0397**Date Arrived **03/23/01**ETC Order Number **0103738**ETC Lab ID : **0103738-02**Field ID : **DF/24-B/1062/Total/001**Matrix : **SOIL**Sample Date : **03/27/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	BY	METHOD	QC BATCH
Total Cyanide	ND	mg/Kg	1.00	03/27/01	GD	9010B	CY032711
Ignitability/Flashpoint	> 96	oC		03/26/01	GD	1010	IG032611
pH - Corrosivity	7.1	SU		03/26/01	TL	9045C	PH032611
Sulfide	ND	mg/Kg	20	03/27/01	TD	9030B	SD032711


Data Validator

ND - Not Detected

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ENVIRONMENTAL TESTING & CONSULTING, INC. 2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-7750

Client Name **Innovative Waste Management**Site ID **Dunn Field**
P.O. Box 50397
Summerville, SC 29485-0397

PID #

Date Arrived **03/23/01**ETC Order Number **0103738**ETC Lab ID **0103738-02**Field ID : **DF/24-B/1082/Total/001**Matrix **SOIL**Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Volatile Organics				03/26/01	EM	8260B 5035
QC Batch	V003261					
Dilution Factor	1					
Acetone	ND	ug/Kg	40.0			
Benzene	ND	ug/Kg	2.00			
Bromodichloromethane	ND	ug/Kg	2.00			
Bromoform	ND	ug/Kg	2.00			
Bromomethane	ND	ug/Kg	2.00			
2-Butanone (MEK)	ND	ug/Kg	40.0			
Carbon Disulfide	ND	ug/Kg	2.00			
Carbon Tetrachloride	ND	ug/Kg	2.00			
Chlorobenzene	ND	ug/Kg	2.00			
Chlorodibromomethane	ND	ug/Kg	2.00			
Chloroethane	ND	ug/Kg	2.00			
Chloroform	ND	ug/Kg	2.00			
Chloromethane	ND	ug/Kg	2.00			
1,1-Dichloroethane	ND	ug/Kg	2.00			
1,2-Dichloroethane	ND	ug/Kg	2.00			
1,1-Dichloroethene	ND	ug/Kg	2.00			
1,2-Dichloroethene (Total)	ND	ug/Kg	2.00			
1,2-Dichloropropane	ND	ug/Kg	2.00			
cis-1,3-Dichloropropene	ND	ug/Kg	2.00			
trans-1,3-Dichloropropene	ND	ug/Kg	2.00			
Ethylbenzene	ND	ug/Kg	2.00			
2-Hexanone (MBK)	ND	ug/Kg	10.0			
4-Methyl-2-pentanone (MIBK)	ND	ug/Kg	10.0			
Methylene Chloride	ND	ug/Kg	20.0			
Styrene	ND	ug/Kg	1.00			
1,1,2,2-Tetrachloroethane	ND	ug/Kg	2.00			
Tetrachloroethene	ND	ug/Kg	2.00			
Toluene	ND	ug/Kg	2.00			
1,1,1-Trichloroethane	ND	ug/Kg	2.00			
1,1,2-Trichloroethane	ND	ug/Kg	2.00			
Trichloroethene	ND	ug/Kg	2.00			
Vinyl Chloride	ND	ug/Kg	2.00			
Xylenes-m,p	ND	ug/Kg	2.00			
Xylenes-o	ND	ug/Kg	2.00			
Surrogate Standard			% Recovery	QC Limits		
S1 - Dibromofluoromethane			109	70	134	
S2 - Toluene-d8			101	85	111	
S3 - 4-Bromofluorobenzene			89	81	117	
S4 - 1,2-Dichloroethane-d4			119	80	120	

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

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ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2150

Client Name **Innovative Waste Management**Site ID **Dunn Field**P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **03/23/01**ETC Order Number **0103738**ETC Lab ID **0103738-02**Matrix **SOIL**Field ID **DF/24-B/1082/Total/001**Sample Date **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid				03/27/01	03/26/01	PF 8270C 35508
QC Batch	P04511					
Dilution Factor	10					
Acenaphthene	ND	ug/Kg	670			
Acenaphthylene	ND	ug/Kg	670			
Anthracene	78 91	ug/Kg	670			
Benzo(a)anthracene	3601	ug/Kg	670			OK
Benzo(b)fluoranthene	ND	ug/Kg	670			
Benzo(k)fluoranthene	ND	ug/Kg	670			
Benzo(g,h,i)perylene	ND	ug/Kg	670			
Benzo(a)pyrene	ND	ug/Kg	670			
Bis(2-chloroethoxy)methane	ND	ug/Kg	1700			
Bis(2-chloroethyl)ether	ND	ug/Kg	1700			
Bis(2-chloroisopropyl)ether	ND	ug/Kg	1700			
Bis(2-ethylhexyl)phthalate	ND	ug/Kg	1700			
4-Bromophenyl phenyl ether	ND	ug/Kg	1700			
Buryl benzyl phthalate	ND	ug/Kg	1700			
4-Chloroaniline	ND	ug/Kg	1700			
2-Chloroanthracene	ND	ug/Kg	1700			
4-Chloro-3-methylphenol	ND	ug/Kg	1700			
2-Chlorophenol	ND	ug/Kg	1700			
4-Chlorophenyl phenyl ether	ND	ug/Kg	1700			
Chrysene	3141	ug/Kg	670			OK
Dibenzo(a,h)anthracene	ND	ug/Kg	670			
Dibenzofuran	ND	ug/Kg	1700			
1,2-Dichlorobenzene	ND	ug/Kg	1700			
1,3-Dichlorobenzene	ND	ug/Kg	1700			
1,4-Dichlorobenzene	ND	ug/Kg	1700			
Di-n-butyl phthalate	ND	ug/Kg	1700			
3,3'-Dichlorobenzidine	ND	ug/Kg	1700			
2,4-Dichlorophenol	ND	ug/Kg	1700			
2,6-Dichlorophenol	ND	ug/Kg	1700			
Diethyl phthalate	ND	ug/Kg	1700			
2,4-Dimethylphenol	ND	ug/Kg	1700			
Dimethyl phthalate	ND	ug/Kg	1700			
4,6-Dinitro-2-methylphenol	ND	ug/Kg	1700			
2,4-Dinitrophenol	ND	ug/Kg	3300			
2,4-Dinitrotoluene	ND	ug/Kg	1700			
2,6-Dinitrotoluene	ND	ug/Kg	1700			
Di-n-octyl phthalate	ND	ug/Kg	1700			
Fluoranthene	1,801	ug/Kg	670			OK
Fluorine	ND	ug/Kg	670			
Hexachlorobenzene	ND	ug/Kg	1700			
Hexachlorobutadiene	ND	ug/Kg	1700			
Hexachlorocyclopentadiene	ND	ug/Kg	1700			
Hexachloroethane	ND	ug/Kg	1700			
Indeno(1,2,3-cd)pyrene	ND	ug/Kg	670			
Isophorone	ND	ug/Kg	1700			
2-Methylnaphthalene	ND	ug/Kg	1700			
2-Methylphenol (o-cresol)	ND	ug/Kg	1700			

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

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ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-1750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**

P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **03/23/01**
ETC Order Number **0103738**

ETC Lab ID **0103738-02**
Field ID : **DF/24-B/1082/Total/001**

Matrix: : **SOIL**
Sample Date : **03/23/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid						
4-Methylphenol (p-cresol)	ND	ug/Kg	1700	03/27/01	PF	8270C
Naphthalene	ND	ug/Kg	670		03/26/01	3550B
Nitrobenzene	ND	ug/Kg	1700			
2-Nitroaniline	ND	ug/Kg	1700			
3-Nitroaniline	ND	ug/Kg	1700			
4-Nitroaniline	ND	ug/Kg	1700			
2-Nitrophenol	ND	ug/Kg	1700			
4-Nitrophenol	ND	ug/Kg	1700			
N-Nitrosodiphenylamine	ND	ug/Kg	1700			
N-Nitrosodipropylamine	ND	ug/Kg	1700			
Pentachlorophenol	ND	ug/Kg	1700			
Phenanthrene	ND	ug/Kg	1700			
Phenol	456J	ug/Kg	670			
Pyrene	ND	ug/Kg	1700			
1,2,4-Trichlorobenzene	812	ug/Kg	670			
2,4,5-Trichlorophenol	ND	ug/Kg	1700			
2,4,6-Trichlorophenol	ND	ug/Kg	1700			
Surrogate Standard						
S1 - Nitrobenzene-d5	73		25			110
S2 - 2-Fluorobiphenyl	95		33			114
S3 - 4-Terphenyl-d14	138 Q		37			115
S4 - Phenol-d6	50		11			125
S5 - 2,4,6-Tribromophenol	54		9			134
S6 - 2-Fluorophenol	42		10			119

John Valdivia

ND - Not Detected

Q - Recovery Outside QC Limits

Fuel Water Mix Found During Closeout

DRAFT



UXB International, Inc. Demining - Ordnance and Explosive Waste Services

Mr. Frank Johnson
Project Manager
UXB International Inc.
1325 Landfair Dr. #103
Germantown, TN 38138

8 May 2001

Subject: Investigative Derived Waste (IDW) water samples: DF/DW/1122/01

Reference: Environmental Testing and Consulting Test report 0105077

Dear Frank:

I have reviewed the set of analytical results transmitted to me from the referenced sample taken from the Dunn Field site. All of the sample results were evaluated against the Region 9 Preliminary Remediation Goals (PRGs) 1999 criterion for Industrial Soils (as modified per agreement) which can be found on the Web at <http://www.epa.gov/region09/waste/sfund/prg/> and 40 CFR 261.24 Table 1, which can be found at <http://frwebgate.access.gpo.gov/>. Modifications to the criterion included adjusting the following chemicals' acceptable limits to the following concentrations:

Aluminum	24,000 mg/kg
Antimony	7 mg/kg
Arsenic	20 mg/kg
Dioxin	10 mg/kg
Iron	37,000 mg/kg
Lead	400 mg/kg
Manganese	1,300 mg/kg

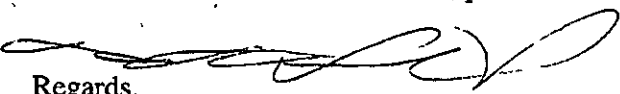
ETC labs experienced problems when attempting the analysis of these samples. Analysis of the Volatiles, Semi-volatiles, TPH, Pesticides, Herbicides, and PCBs all failed QC criteria. It seems likely that CTC will be unable to analyze these samples with any degree of certainty.

The following sample was reviewed and disapproved as noted:

Sample ID	Napthalene	Approved (Y/N)
	As Analyzed (mg/l)	
DF/DW/1122/01	150	N (Failed QC)

Napthalene and 2-methyl Napthalene (190 PPM) were both found in this sample. Although these values of these materials do not in and of themselves make the material a hazardous waste, the fact that the analysis failed QC criteria and had high levels of these two constituents leads me to recommend that the water be disposed of as non-hazardous liquid waste, and not disposed of by discharge into the sanitary sewer system.

If you need additional information, please call me at the number below.



Regards,

Harley Heaton
Director, AEDA Technologies

654 217

MAY-04-01 04:17 PM UXB INTERNATIONAL INC

9016244681

P.01

UXB International Inc.

Dunn Field, Memphis, TN

Fax

To: Harley Heaton From: Jim Dunkle
Fax: 703-724-3528 Pages: 17 Including Cover
Phone: _____ Date: 4 May 01
Re: Rain Water CC: _____
☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

This was found during pre-inspection
2 May 01

Believed To Be Rain Water Mixed
With Diesel Fuel

Request Recommended Disposition.

This Is The Last Item To Be Taken
Care Of Before We/I Can Leave
Phone (Cell) 301-535-7812

GERRARDO @ INNOVATIVE WASTE
800 858 1663

05/04/2001 15:01 9013276334

PAGE 01

**BEST AVAILABLE
COPY**

Environmental Testing & Consulting, Inc.
2924 Walnut Grove Road Memphis, TN 38111
Founded 1972

Transmittal Cover Sheet

To: <i>Jerry Mem</i>	From: <i>Angela Jones</i>
Fax Number: <i>901-425-1700</i>	
Date: <i>5/4/01</i>	For Information Call: 901-327-2750
Subject: <i>Results</i>	Fax Number: 901-327-6334

This transmittal contains 7 pages including this cover.

<i>BAA</i>
<i>HERB</i>
<i>Metas</i>
<i>You should have all results.</i>
<i>Have a great weekend!</i>

The information contained in this transmittal is confidential and is intended for the sole use of the addressee named above. The copying or distribution of any information contained herein by any party other than the addressee is prohibited. If you have received this document in error, please notify us by phone and return it by mail to the above address.
Thank you.

05/04/2001 15:01 9013276334

ETC

PAGE 82

ENVIRONMENTAL TESTING & CONSULTING, INC. 2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field 7512-060**

P.O. Box 50397
Summerville, SC 29485-0397

Date Arrived **05/02/01**
ETC Order Number **0105077**

ETC Lab ID : **0105077-01**
Field ID : **DF/DW/1122/01**

Matrix : **AQUEOUS**
Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED	BY	METHOD
Metals Digestion Batch	V25-AQ-90				05/03/01	NR	3015
Mercury Digestion Batch	V8-AQ-33				05/03/01	JF	7470A
Silver	ND	ug/L	5.00	05/04/01	05/03/01	SH	6010B
Aluminum	157	ug/L	125	05/04/01	05/03/01	SH	6010B
Arsenic	ND	ug/L	5.00	05/04/01	05/03/01	SH	6010B
Barium	32.8	ug/L	25.0	05/04/01	05/03/01	SH	6010B
Beryllium	ND	ug/L	0.50	05/04/01	05/03/01	SH	6010B
Calcium	14,000	ug/L	125	05/04/01	05/03/01	SH	6010B
Cadmium	ND	ug/L	1.00	05/04/01	05/03/01	SH	6010B
Cobalt	ND	ug/L	12.5	05/04/01	05/03/01	SH	6010B
Chromium	ND	ug/L	5.00	05/04/01	05/03/01	SH	6010B
Copper	6.61	ug/L	5.00	05/04/01	05/03/01	SH	6010B
Iron	124	ug/L	150	05/04/01	05/03/01	JF	7470A
Mercury	ND	ug/L	0.20	05/04/01	05/03/01	SH	6010B
Potassium	377	ug/L	125	05/04/01	05/03/01	SH	6010B
Magnesium	467	ug/L	125	05/04/01	05/03/01	SH	6010B
Manganese	22.3	ug/L	12.5	05/04/01	05/03/01	SH	6010B
Sodium	771	ug/L	125	05/04/01	05/03/01	SH	6010B
Nickel	ND	ug/L	10.0	05/04/01	05/03/01	SH	6010B
Lead	ND	ug/L	3.75	05/04/01	05/03/01	SH	6010B
Antimony	ND	ug/L	10.0	05/04/01	05/03/01	SH	6010B
Selenium	6.78	ug/L	5.00	05/04/01	05/03/01	SH	6010B
Thallium	ND	ug/L	10.0	05/04/01	05/03/01	SH	6010B
Vanadium	ND	ug/L	25.0	05/04/01	05/03/01	SH	6010B
Zinc	29.5	ug/L	12.5	05/04/01	05/03/01	SH	6010B

Data Validator

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901) 827-2730

Client Name **Innovative Waste Management**Site ID **Dunn Field 7512-060**P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **05/02/01**ETC Order Number **0105077**ETC Lab ID **0105077-01**Field ID : **DF/DW/1122/01**Matrix : **AQUEOUS**Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid				05/04/01	05/03/01	PF 8270C 3510C
QC Batch	F06118					
Dilution Factor	1000					
Acenaphthene	ND	ug/L	2000			
Acenaphthylene	ND	ug/L	2000			
Anthracene	ND	ug/L	2000			
Benzo(a)anthracene	ND	ug/L	2000			
Benzo(b)fluoranthene	287J	ug/L	2000			
Benzo(k)fluoranthene	263J	ug/L	2000			
Benzo(g,h,i)perylene	578J	ug/L	2000			
Benzo(a)pyrene	337J	ug/L	2000			
Bis(2-chloroethoxy)methane	ND	ug/L	5000			
Bis(2-chloroethyl)ether	ND	ug/L	5000			
Bis(2-chloroisopropyl)ether	ND	ug/L	5000			
Bis(2-ethylhexyl)phthalate	ND	ug/L	10000			
4-Bromophenyl phenyl ether	ND	ug/L	5000			
Butyl benzyl phthalate	ND	ug/L	5000			
4-Chloroaniline	ND	ug/L	5000			
2-Chloronaphthalene	ND	ug/L	5000			
4-Chloro-3-methylphenol	ND	ug/L	5000			
2-Chlorophenol	ND	ug/L	5000			
4-Chlorophenyl phenyl ether	ND	ug/L	5000			
Chrysene	ND	ug/L	2000			
Dibenzo(a,h)anthracene	337J	ug/L	2000			
Dibenzofuran	ND	ug/L	5000			
1,2-Dichlorobenzene	ND	ug/L	5000			
1,3-Dichlorobenzene	ND	ug/L	5000			
1,4-Dichlorobenzene	ND	ug/L	5000			
Di-n-butyl phthalate	ND	ug/L	5000			
3,3'-Dichlorobenzidine	ND	ug/L	10000			
2,4-Dichlorophenol	ND	ug/L	5000			
Diethyl phthalate	ND	ug/L	5000			
2,4-Dimethylphenol	ND	ug/L	5000			
Dimethyl phthalate	ND	ug/L	5000			
4,6-Dinitro-2-methylphenol	ND	ug/L	5000			
2,4-Dinitrophenol	ND	ug/L	10000			
2,4-Dinitrotoluene	ND	ug/L	50000			
2,6-Dinitrotoluene	ND	ug/L	5000			
Di-n-octyl phthalate	ND	ug/L	5000			
Fluoranthene	ND	ug/L	2000			
Fluorene	ND	ug/L	2000			
Hexachlorobenzene	ND	ug/L	5000			
Hexachlorobutadiene	ND	ug/L	5000			
Hexachlorocyclopentadiene	ND	ug/L	5000			
Hexachloroethane	ND	ug/L	5000			
Indeno(1,2,3-cd)pyrene	509J	ug/L	2000			
Isophorone	ND	ug/L	5000			
2-Methylnaphthalene	193,000E	ug/L	2000			
2-Methylphenol (o-cresol)	ND	ug/L	5000			
4-Methylphenol (p-cresol)	ND	ug/L	5000			

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field 7512-060**P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **05/02/01**
ETC Order Number **0105077**ETC Lab ID **0105077-01**
Field ID : **DF/DW/1122/01**Matrix : **AQUEOUS**
Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid				05/04/01	03/03/01	PF 8270C 3510C
Naphthalene	150,000	ug/L	2000			
Nitrobenzene	ND	ug/L	5000			
2-Nitroaniline	ND	ug/L	5000			
3-Nitroaniline	ND	ug/L	10000			
4-Nitroaniline	ND	ug/L	5000			
2-Nitrophenol	ND	ug/L	5000			
4-Nitrophenol	ND	ug/L	5000			
N-Nitrosodiphenylamine	ND	ug/L	5000			
N-Nitrosodipropylamine	ND	ug/L	5000			
Pentachlorophenol	ND	ug/L	10000			
Phenanthrene	3301	ug/L	2000			
Phenol	ND	ug/L	5000			
Pyrene	ND	ug/L	2000			
1,2,4-Trichlorobenzene	ND	ug/L	5000			
2,4,5-Trichlorophenol	ND	ug/L	5000			
2,4,6-Trichlorophenol	ND	ug/L	5000			
Surrogate Standard			% Recovery	QC Limits		
S1 - Nitrobenzene-d5	Q		29			110
S2 - 2-Fluorobiphenyl	100		38			107
S3 - 4-Terphenyl-d14	Q		33			122
S4 - Phenol-d6	107 Q		7			58
S5 - 2,4,6-Tribromophenol	Q		16			138
S6 - 2-Fluorophenol	Q		8			68

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ETC

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-3750

Client Name **Innovative Waste Management** Site ID **Duan Field 7512-060**
P.O. Box 50397 FID #
Summerville, SC 29485-0397

Date Arrived **05/02/01**
ETC Order Number **0105077**

ETC Lab ID **0105077-01**
Field ID **DF/DW/1122/01-DIL**

Matrix : **AQUEOUS**
Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Base/Neutral & Acid				05/04/01	05/03/01	PF 8270C 3310C
QC Batch	P06118					
Dilution Factor	10000					
Acenaphthene	ND	ug/L	20000			
Acenaphthylene	ND	ug/L	20000			
Anthracene	ND	ug/L	20000			
Benzo(a)anthracene	ND	ug/L	20000			
Benzo(b)fluoranthene	ND	ug/L	20000			
Benzo(k)fluoranthene	ND	ug/L	20000			
Benzo(g,h,i)perylene	ND	ug/L	20000			
Benzo(a)pyrene	ND	ug/L	20000			
Bis(2-chloroethoxy)methane	ND	ug/L	50000			
Bis(2-chloroethyl)ether	ND	ug/L	50000			
Bis(2-chloroisopropyl)ether	ND	ug/L	50000			
Bis(2-ethylhexyl)phthalate	ND	ug/L	100000			
4-Bromophenyl phenyl ether	ND	ug/L	50000			
Bis(2-benzyl)phthalate	ND	ug/L	50000			
4-Chloroaniline	ND	ug/L	50000			
2-Chloronaphthalene	ND	ug/L	50000			
4-Chloro-3-methylphenol	ND	ug/L	50000			
2-Chlorophenol	ND	ug/L	50000			
4-Chlorophenyl phenyl ether	ND	ug/L	50000			
Chrysene	ND	ug/L	20000			
Dibenz(a,h)anthracene	ND	ug/L	20000			
Dibenzofuran	ND	ug/L	50000			
1,2-Dichlorobenzene	ND	ug/L	50000			
1,3-Dichlorobenzene	ND	ug/L	50000			
1,4-Dichlorobenzene	ND	ug/L	50000			
Di-n-butyl phthalate	ND	ug/L	50000			
3,3'-Dichlorobenzidine	ND	ug/L	100000			
2,4-Dichlorophenol	ND	ug/L	50000			
Diethyl phthalate	ND	ug/L	50000			
2,4-Dimethylphenol	ND	ug/L	50000			
Dimethyl phthalate	ND	ug/L	50000			
4,6-Dinitro-2-methylphenol	ND	ug/L	100000			
2,4-Dinitrophenol	ND	ug/L	500000			
2,4-Dinitrotoluene	ND	ug/L	50000			
2,6-Dinitrotoluene	ND	ug/L	50000			
Di-n-octyl phthalate	ND	ug/L	50000			
Fluoranthene	ND	ug/L	20000			
Fluorene	ND	ug/L	20000			
Hexachlorobenzene	ND	ug/L	50000			
Hexachlorobutadiene	ND	ug/L	50000			
Hexachlorocyclopentadiene	ND	ug/L	50000			
Hexachloroethane	ND	ug/L	50000			
Indeno(1,2,3-cd)pyrene	ND	ug/L	20000			
Isophthalene	ND	ug/L	50000			
2-Methylnaphthalene	207,000	ug/L	20000			
2-Methylphenol (o-cresol)	ND	ug/L	50000			
4-Methylphenol (p-cresol)	ND	ug/L	50000			

Data Validator ND - Not Detected Q - Recovery Outside QC Limits

Data Validator ND - Not Detected Q - Recovery Outside QC Limits

654 223

MAY-04-01 04:24 PM UXB INTERNATIONAL INC

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P.16

05/04/2001 15:01 9013276334

ETC

PAGE 06

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field 7512-060**P.O. Box 50397
Summerville, SC 29485-0397

PID #

Date Arrived **05/02/01**ETC Order Number **0105077**ETC Lab ID **0105077-01**Field ID : **DF/DW/1122/01**Matrix : **AQUEOUS**Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
Chlorinated Herbicides				05/04/01	05/03/01	RG 8151A 8151A
QC Batch	P13019					
Dilution Factor	10					
2,4-D	ND	ug/L	5.00			
2,4,5-TP(Silverx)	ND	ug/L	5.00			
2,4,5-T	ND	ug/L	2.00			
Dinoseb	ND	ug/L	27.0			
<u>Surrogate Standard</u>	<u>% Recovery</u>		<u>QC Limits</u>			
S1 - 2,4 DCAA	167 Q		20	150		


Jala Validator

ND - Not Detected

Q - Recovery Outside QC Limits



Environmental Testing & Consulting, Inc.
2924 Walnut Grove Road Memphis, TN 38111
Founded 1972

Transmittal Cover Sheet

To: <i>Gerrey / Jim</i>	From: <i>Angela Jones</i>
Fax Number: <i>743-1700</i>	
Date: <i>5/4/01</i>	For Information Call: 901-327-2750
Subject: <i>Results</i>	Fax Number: 901-327-6334

This transmittal contains 9 pages including this cover.

<i>Inorg</i>	
<i>VOC</i>	
<i>TPH EXT</i>	
<i>Pest</i>	
<i>PCB</i>	
<i>BNA / HERB will be faxed following this one. They are in folder system!</i>	

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Thank you.

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)317-3750
ANALYTICAL SUMMARY/CROSS REFERENCE TABLEClient Name **Innovative Waste Management**
Site ID **Dunn Field 7512-060**ETC Order #0105077
7512-060

ETC Sample ID	Field ID	Matrix	Method	Method Description
010507701	DF/DW/1122/01	AQUEOUS	73.3	Reactive Cyanide
010507701	DF/DW/1122/01	AQUEOUS	1010	Aciditability/Endpoint
010507701	DF/DW/1122/01	AQUEOUS	9040B	pH
010507701	DF/DW/1122/01	AQUEOUS	73.4	Reactive Sulfide
010507701	DF/DW/1122/01	AQUEOUS	6010B	Silver
010507701	DF/DW/1122/01	AQUEOUS	6010B	Aluminum
010507701	DF/DW/1122/01	AQUEOUS	6010B	Antimony
010507701	DF/DW/1122/01	AQUEOUS	6010B	Barium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Beryllium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Calcium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Cadmium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Cobalt
010507701	DF/DW/1122/01	AQUEOUS	6010B	Chromium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Copper
010507701	DF/DW/1122/01	AQUEOUS	6010B	Iron
010507701	DF/DW/1122/01	AQUEOUS	7470A	Mercury
010507701	DF/DW/1122/01	AQUEOUS	6010B	Potassium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Magnesium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Manganese
010507701	DF/DW/1122/01	AQUEOUS	6010B	Sodium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Nickel
010507701	DF/DW/1122/01	AQUEOUS	6010B	Lead
010507701	DF/DW/1122/01	AQUEOUS	6010B	Antimony
010507701	DF/DW/1122/01	AQUEOUS	6010B	Selenium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Thallium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Vanadium
010507701	DF/DW/1122/01	AQUEOUS	6010B	Zinc
010507701	DF/DW/1122/01	AQUEOUS	8260B	GC/MS Volatile Organics
010507701	DF/DW/1122/01	AQUEOUS	8270C	GC/MS Base/Neutral & Acid
010507701	DF/DW/1122/01	AQUEOUS	8151A	Chlorinated Herbicides
010507701	DF/DW/1122/01	AQUEOUS	8081A	Organochlorine Pesticides
010507701	DF/DW/1122/01	AQUEOUS	8082	PCBs
010507701	DF/DW/1122/01	AQUEOUS	TN EPH	TPH - Extractable Range

c> 5/3/01
Page 1
May 3, 2001

15.30

Not Validated

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field 7512-060**

P.O. Box 50397
Summerville, SC 29485-0397

PID #

Date Arrived **05/02/01**
ETC Order Number **0105077**

ETC Lab ID **0105077-01**
Field ID **DF/DW/1122/01**

Matrix : **AQUEOUS**
Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
GC/MS Volatile Organics				05/03/01	EM	8260B 5030B
QC Batch	V405031					
Dilution Factor	1000					
Acetone	ND	ug/L	20000			
Benzene	ND	ug/L	1000			
Bromodichloromethane	ND	ug/L	1000			
Bromoform	ND	ug/L	1000			
Bromomethane	ND	ug/L	1000			
2-Butanone (MEK)	ND	ug/L	20000			
Carbon Disulfide	ND	ug/L	1000			
Carbon Tetrachloride	ND	ug/L	1000			
Chlorobenzene	ND	ug/L	1000			
Chlorodibromomethane	ND	ug/L	1000			
Chloroethane	ND	ug/L	1000			
Chloroform	ND	ug/L	1000			
Chloromethane	ND	ug/L	1000			
1,1-Dichloroethane	ND	ug/L	1000			
1,2-Dichloroethane	ND	ug/L	1000			
1,1-Dichloroethene	ND	ug/L	1000			
1,2-Dichloroethene (Total)	ND	ug/L	1000			
1,2-Dichloropropane	ND	ug/L	1000			
cis-1,3-Dichloropropene	ND	ug/L	1000			
trans-1,3-Dichloropropene	ND	ug/L	1000			
Ethylbenzene	ND	ug/L	1000			
2-Hexanone (MBK)	ND	ug/L	5000			
4-Methyl-2-pentanone (MIBK)	ND	ug/L	5000			
Methylene Chloride	ND	ug/L	5000			
Styrene	ND	ug/L	1000			
1,1,2,2-Tetrachloroethane	ND	ug/L	1000			
Tetrachloroethene	ND	ug/L	1000			
Toluene	ND	ug/L	1000			
1,1,1-Trichloroethane	ND	ug/L	1000			
1,1,2-Trichloroethane	ND	ug/L	1000			
Trichloroethene	ND	ug/L	1000			
Vinyl Chloride	ND	ug/L	1000			
Xylenes-m,p	ND	ug/L	1000			
Xylenes-o	ND	ug/L	1000			
Surrogate Standard			% Recovery	QC Limits		
S1 - Dibromofluoromethane	100		74	123		
S2 - Toluene-d8	95		86	112		
S3 - 4-Bromofluorobenzene	102		81	115		
S4 - 1,2-Dichloroethane-d4	93		80	120		

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 227

MAY-04-01 04:19 PM UXB INTERNATIONAL INC
05/04/2001 14:38 9813276334 ETC

9816244681

P.05

PAGE 04

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-3790Client Name **Innovative Waste Management**Site ID **Dunn Field 7512-060****P.O. Box 50397
Summerville, SC 29485-0397**

PID #

Date Arrived **05/02/01**ETC Order Number **0105077**ETC Lab ID **0105077-01**Field ID : **DF/DW/1122/01**Matrix : **AQUEOUS**Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TPH - Extractable Range				05/03/01	05/03/01	PF TN EPH 3510C
QC Batch	P03041					
Dilution Factor	1000					
Extractable Hydrocarbons	737	mg/L	100			
Surrogate Standard	% Recovery		QC Limits			
SI - O-Terphenyl	Q		30 130			

LAB VALIDATOR

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.
 2924 Walnut Grove Road - Memphis, TN 38111 - (901)337-2759

Client Name **Innovative Waste Management**

Site ID **Dunn Field 7512-060**

P.O. Box 50397
 Summerville, SC 29485-0397

FID #

Date Arrived **05/02/01**
 ETC Order Number **0105077**

ETC Lab ID **0105077-01**
 Field ID : **DF/DW/1122/01**

Matrix : **AQUEOUS**
 Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
Organochlorine Pesticides				05/03/01	05/03/01	RG 8081A 3510C
QC Batch	P08036					
Dilution Factor	10					
Aldrin	ND	ug/L	0.400			
Alpha-BHC	ND	ug/L	0.400			
Beta-BHC	ND	ug/L	0.400			
Delta-BHC	ND	ug/L	0.400			
Gamma-BHC (Lindane)	ND	ug/L	0.400			
Alpha-Chlordane	ND	ug/L	0.400			
Gamma-Chlordane	ND	ug/L	0.400			
Chlordane	ND	ug/L	2.50			
4,4'-DDD	ND	ug/L	0.400			
4,4'-DDE	ND	ug/L	0.400			
4,4'-DDT	ND	ug/L	0.400			
Dieldrin	ND	ug/L	0.400			
Endosulfan I	ND	ug/L	0.400			
Endosulfan II	ND	ug/L	0.400			
Endosulfan Sulfate	ND	ug/L	0.400			
Endrin	ND	ug/L	0.400			
Endrin Aldahyde	1.17	ug/L	0.400			
Endrin Ketone	ND	ug/L	0.400			
Heptachlor	ND	ug/L	0.400			
Heptachlor Epoxide	ND	ug/L	0.400			
Methoxychlor	ND	ug/L	0.400			
Toxaphene	ND	ug/L	30.0			
Surrogate Standard			% Recovery	QC Limits		
S1 - Decachlorobiphenyl	101		34	115		
S2 - Tetrachloro-m-xylene	Q		31	96		

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 229

MAY-04-01 04:20 PM UXB INTERNATIONAL INC

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05/04/2001 14:38

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ETC

PAGE 06

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field 7512-060**P.O. Box 50397
Summerville, SC 29485-0397

PID #

Date Arrived **05/02/01**ETC Order Number **0105077**ETC Lab ID **0105077-01**Field ID : **DE/DW/1122/01**Matrix : **AQUEOUS**Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
PCBs				05/03/01	RG	8082 3510C
QC Batch	P10017					
Dilution Factor	10					
PCB-1016	ND	ug/L	5.00			
PCB-1221	ND	ug/L	5.00			
PCB-1232	ND	ug/L	5.00			
PCB-1242	ND	ug/L	5.00			
PCB-1248	ND	ug/L	5.00			
PCB-1254	ND	ug/L	5.00			
PCB-1260	ND	ug/L	5.00			
<u>Surrogate Standard</u>	<u>% Recovery</u>		<u>QC Limits</u>			
S1 - Tetrachloro-m-xylene	181 Q		31			96
S2 - Decachlorobiphenyl	32 Q		34			115

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field 7512-060****P.O. Box 50397****Summerville, SC 29485-0397**Date Arrived **05/02/01**ETC Order Number **0105077**ETC Lab ID : **0105077-01**Matrix : **AQUEOUS**Field ID : **DF/DW/1122/01**Sample Date : **05/02/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	BY	METHOD	QC BATCH
Reactive Cyanide	<0.125	mg/L	0.125	05/04/01	TL	7.3.3	RC050411
Ignitability/Flashpoint	>96	oC		05/04/01	GD	1010	IG050411
pH	6.8	SU		05/02/01	RT	90408	PH052111
Reactive Sulfide	<25	mg/L	25	05/04/01	TL	7.3.4	RS050411


Data Validator

ND - Not Detected

Environmental Testing & Consulting, Inc.
Data Qualifiers for Organic Reporting

Within the attached report, some analytical data may be reported as "Qualified Data" as indicated by a "Data Qualifier" next to the result. This table summarizes the possible "Data Qualifiers" that may be associated with this report. These qualifiers do not apply for TIC reports.

Q	Surrogate Recovery Outside QC Limits
J	Estimated Value. Presence of the compound was confirmed but less than the reported detection limit.
E	Concentration exceeds the established method calibration range but is within the working range of the instrument.
B	Analyte detected in the associated Method Blank.
U	Reported result was Unconfirmed. Refer to Case Narrative.
C	Result reported from GC/MS confirmation analysis.
M	Result reported represents a minimum value. Refer to Case Narrative.
NC	Result reported from Primary Column. Result did not confirm.
*	QC Data (percent recovery/RPD for a particular analyte was outside QC Limits)

ETC

PAGE 09

FORM 1
VOA-GCMS ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

CLIENT SAMPLE NO.

0105-077-1

Lab Name: ETC, INC.

Contract:

Lab Code:

Case No.:

SAS No.:

SDG No.: 0105-077

Matrix: (soil/water) WATER

Lab Sample ID:

Sample wt/vol: 10.00 (g/mL) ML

Lab File ID: 1801018

Level: (low/med) LOW

Date Received: _____

% Moisture: not dec. _____

Date Analyzed: 05/03/01

GC Column: ID: 2.00 (mm)

Dilution Factor: 1000.0

Soil Extract Volume: _____ (uL)

Soil Aliquot Volume: _____ (uL)

Number TICs found: 15

CONCENTRATION UNITS:
(ug/L or ug/Kg) ug/L

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1. 874-41-9	BENZENE, 1-ETHYL-2,4-DIMETHY	12.81	32310	NJ
2. 934-80-5	BENZENE, 4-ETHYL-1,2-DIMETHY	13.27	59160	NJ
3. 527-53-7	BENZENE, 1,2,3,5-TETRAMETHYL	13.32	64140	NJ
4. 874-35-1	1H-INDENE, 2,3-DIHYDRO-5-MET	13.59	75970	NJ
5. 112-40-3	DODECANE	13.64	33950	NJ
6. 27133-93-3	2,3-DIHYDRO-1-METHYLINDENE	13.75	94270	NJ
7. 17301-23-4	UNDECANE, 2,6-DIMETHYL-	13.84	32510	NJ
8. 700-12-9	BENZENE, PENTAMETHYL-	14.13	87950	NJ
9. 17057-82-8	1H-INDENE, 2,3-DIHYDRO-1,2-D	14.16	51580	NJ
10. 56253-64-6	BENZENE, (2-METHYL-1-BUTENYL	14.27	84750	NJ
11. 16002-93-0	TRANS-1-PHENYL-1-PENTENE	14.77	57470	NJ
12. 17059-48-2	1H-INDENE, 2,3-DIHYDRO-1,6-D	15.02	58420	NJ
13. 54340-85-1	BENZENE, 1-(2-BUTENYL)-2,3-D	15.19	32990	NJ
14. 1685-82-1	1H-INDENS, 2,3-DIHYDRO-4,6-D	15.27	58170	NJ
15. 90-12-0	NAPHTHALENE, 1-METHYL-	16.09	38600	NJ
16.				
17.				
18.				
19.				
20.				
21.				
22.				
23.				
24.				
25.				
26.				
27.				
28.				
29.				
30.				

FORM 1 VOA-GCMS-TIC

Site 1 Soil

DRAFT



UXB International, Inc. Demining - Ordnance and Explosive Waste Services

September 11, 2000

Mr. Shawn Phillips
Memphis Depot BCT

SUBJECT: Request for a Review of Soil Sample Analytical Reports

Reference: Contract Number DACA87-D-0006 Delivery Order 0012
Chemical Warfare Materiel Investigation/Removal Action, Dunn Field

Please review the attached TCLP analytical soil sample analysis for acceptable/unacceptable levels of hazardous or toxic waste (HTW) to determine if the soil is within Federal Environmental Regulatory Limits for retaining the soil at Dunn Field. It is UXB's intention to return the soil to its original excavated site; however, this may be altered to include an even distribution of the collected soil over the site. This will occur if clean backfill was used to "close" the excavation site in the interest of safety.

A client sample ID number identifies each sample. I request a compliance review for each of the following TCLP sample results:

1. DF/S1/0202/SDC/023,
2. DF/S1/0224/SDC/024;
3. DF/S1/0224/SDC/025;
4. DF/S1/0228/SDC/026,
5. DF/S1/0228/SDC/027;
6. DF/S1/0228/SDC/028;
7. DF/S1/0234/SDC/029, and
8. DF/S1/0234/SDC/030.

Your concurrence will permit UXB International, Inc. to retain excavated soil on-site. Non-concurrence will mandate treatment of the soil by an approved waste management company and disposal in accordance with local, state, and federal regulations. Please provide justification for non-concurrence to permit a further review of your findings.

Each attached analytical soil sample is a composite sample representing approximately 20 cubic yards of soil excavated from Dunn Field, Former Defense Distribution Depot, Memphis, Tennessee.

Soil collection piles are segregated on-site and identified by specific soil sample identifiers. This permits UXB to identify each pile of soil with the soil sample collected.

On-site laboratories provided by the Edgewood Chemical and Biological Center (ECBC) cleared collected samples of chemical warfare agents (CWAs). Each sample was subjected to this evaluation prior to shipment for HTW evaluation. An independent laboratory (Severn-Trent, Inc.) performed the HTW analysis.

This request is forwarded to the U.S. Army Engineering Support Center, Huntsville; UXB International, Inc. and Mr. Shawn Phillips of the Memphis Depot BCT. Only joint-concurrence, by a competent person, will permit an untreated return of the excavated soil to Dunn Field.

Please submit a response to

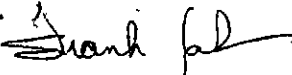
Frank Johnson
1325 Landfair Dr. #103
Germantown, TN 38138

Or fax to (901) 745-4280

Or Email to fjohnson@accessllc.net

Contact me at (703) 625-3792 should you have any questions regarding this issue.

Sincerely,



Frank Johnson
Project Manager

Attachments

TCLP Sample Results for:

DF/S1/0202/SDC/023
DF/S1/0224/SDC/024
DF/S1/0224/SDC/025
DF/S1/0228/SDC/026
DF/S1/0228/SDC/027
DF/S1/0228/SDC/028
DF/S1/0234/SDC/029
DF/S1/0234/SDC/030

SEVERN TRENT LABORATORIES, . . .

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG220122 UKB International PAGE 5
 Dunn Field, Def Depot Memphis Date Reported: 7/31/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0202/SDC/023

Sample #: 003 Date Sampled: 07/20/00 10:00 Date Received: 07/22/00 Matrix: SOLID

Trace Inductively Coupled Plasma (ICP) Metals				Reviewed
Arsenic	9.2	1.2	mg/kg	SW846 6010B

Inductively Coupled Plasma (ICP) Metals TCLP				Reviewed	
Silver	TCLP	ND	0.5	mg/L	SW846 6010B
Arsenic	TCLP	0.19 B	0.5	mg/L	SW846 6010B
Barium	TCLP	1.1 B	10	mg/L	SW846 6010B
Cadmium	TCLP	ND	0.1	mg/L	SW846 6010B
Chromium	TCLP	ND	0.5	mg/L	SW846 6010B
Lead	TCLP	ND	0.5	mg/L	SW846 6010B
Selenium	TCLP	ND N	0.25	mg/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor) TCLP				Reviewed	
Mercury	TCLP	0.000049 B	0.0002	mg/L	SW846 7470A

B Estimated result. Result is less than RL.

N Spiked analyte recovery is outside stated control limits.

Organochlorine Pesticides TCLP				Reviewed
Chlordane (technical)	ND	0.0050	mg/L	SW846 8081A
Endrin	ND	0.00050	mg/L	SW846 8081A
Heptachlor	ND	0.00050	mg/L	SW846 8081A
Heptachlor epoxide	ND	0.00050	mg/L	SW846 8081A
Lindane	ND	0.00050	mg/L	SW846 8081A
Methoxychlor	ND	0.0010	mg/L	SW846 8081A
Toxaphene	ND	0.020	mg/L	SW846 8081A

Chlorinated Herbicides by GC TCLP				Reviewed
2,4-D	ND	0.040	mg/L	SW846 8151A
2,4,5-TP (Silvex)	ND	0.010	mg/L	SW846 8151A

Volatile Organics by GC/MS TCLP				Reviewed
Benzene	ND	0.050	mg/L	SW846 8260B
2-Butanone	0.014 J	0.050	mg/L	SW846 8260B
Carbon tetrachloride	ND	0.050	mg/L	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES, I.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG220122 UKB International PAGE 6
 Dunn Field, Def Depot Memphis Date Reported: 7/31/00
 Project Number: UKB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0202/SDC/023

Sample #: 003 Date Sampled: 07/20/00 10:00 Date Received: 07/22/00 Matrix: SOLID

Volatile Organics by GC/MS TCLP

Chlorobenzene	ND	0.050	mg/L	SW846 8260B
Chloroform	ND	0.050	mg/L	SW846 8260B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8260B
1,1-Dichloroethene	ND	0.050	mg/L	SW846 8260B
Tetrachloroethene	ND	0.050	mg/L	SW846 8260B
Trichloroethene	ND	0.050	mg/L	SW846 8260B
Vinyl chloride	ND	0.050	mg/L	SW846 8260B

Reviewed

J Estimated result. Result is less than RL.

Semivolatile Organic Compounds by GC/MS TCLP

1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270C
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270C
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270C
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270C
Hexachloroethane	ND	0.050	mg/L	SW846 8270C
Nitrobenzene	ND	0.050	mg/L	SW846 8270C
Pentachlorophenol	ND	0.25	mg/L	SW846 8270C
Pyridine	ND	0.10	mg/L	SW846 8270C
2,4,5-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
2,4,6-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
Cresols (total)	ND	0.050	mg/L	SW846 8270C

Reviewed

Inorganic Analysis

Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3
Ignitability	NO	--	No Units	SW846 SECTION 7.1
Soil and Waste pH	8.0		No Units	SW846 9045C
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4
Total Residue as Percent Solids	81.7		%	MCAWW 160.3 MOD

Reviewed

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH120157 UXB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 8/21/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0224/SDC/024

Sample #: 002 Date Sampled: 08/11/00 10:00 Date Received: 08/12/00 Matrix: SOLID

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Arsenic	9.9	1.1	mg/kg	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals TCLP					Reviewed
Silver	TCLP	ND	0.5	mg/L	SW846 6010B
Arsenic	TCLP	0.16 B	0.5	mg/L	SW846 6010B
Barium	TCLP	1.1 B	10	mg/L	SW846 6010B
Cadmium	TCLP	ND	0.1	mg/L	SW846 6010B
Chromium	TCLP	0.0082 B	0.5	mg/L	SW846 6010B
Lead	TCLP	0.035 B	0.5	mg/L	SW846 6010B
Selenium	TCLP	ND	0.25	mg/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor) TCLP					Reviewed
Mercury	TCLP	ND B	0.0002	mg/L	SW846 7470A

B Estimated result. Result is less than RL.

Organochlorine Pesticides TCLP					Reviewed
Chlordane (technical)	ND	0.0050	mg/L	SW846 8081A	
Endrin	ND	0.00050	mg/L	SW846 8081A	
Heptachlor	ND	0.00050	mg/L	SW846 8081A	
Heptachlor epoxide	ND	0.00050	mg/L	SW846 8081A	
Lindane	ND	0.00050	mg/L	SW846 8081A	
Methoxychlor	ND	0.0010	mg/L	SW846 8081A	
Toxaphene	ND	0.020	mg/L	SW846 8081A	

Chlorinated Herbicides by GC TCLP					Reviewed
2,4-D	ND	0.040	mg/L	SW846 8151A	
2,4,5-TP (Silvex)	ND	0.010	mg/L	SW846 8151A	

Volatile Organics by GC/MS TCLP					Reviewed
Benzene	ND	0.050	mg/L	SW846 8260B	
2-Butanone	ND	0.050	mg/L	SW846 8260B	
Carbon tetrachloride	ND	0.050	mg/L	SW846 8260B	
Chlorobenzene	ND	0.050	mg/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, L...

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH120157 UXB International PAGE 4
 Dunn Field, Def Depot Memphis Date Reported: 8/21/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0224/SDC/024

Sample #: 002 Date Sampled: 08/11/00 10:00 Date Received: 08/12/00 Matrix: SOLID

Volatile Organics by GC/MS TCLP

Chloroform	ND	0.050	mg/L	SW846 8260B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8260B
1,1-Dichloroethene	ND	0.050	mg/L	SW846 8260B
Tetrachloroethene	ND	0.050	mg/L	SW846 8260B
Trichloroethene	ND	0.050	mg/L	SW846 8260B
Vinyl chloride	ND	0.050	mg/L	SW846 8260B

Reviewed

Semivolatile Organic Compounds by GC/MS TCLP

1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270C
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270C
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270C
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270C
Hexachloroethane	ND	0.050	mg/L	SW846 8270C
Nitrobenzene	ND	0.050	mg/L	SW846 8270C
Pentachlorophenol	ND	0.25	mg/L	SW846 8270C
Pyridine	ND	0.10	mg/L	SW846 8270C
2,4,5-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
2,4,6-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
Cresols (total)	ND	0.050	mg/L	SW846 8270C

Reviewed

Inorganic Analysis

Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3
Ignitability	NO	--	No Units	SW846 SECTION 7.1
Soil and Waste pH	7.6		No Units	SW846 9045C
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4
Total Residue as Percent Solids	88.9		%	MCAWW 160.3 MOD

Reviewed

(Continued on next page)

SEVERN TRENT LABORATORIES, I.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH120157 UXB International PAGE 5
 Dunn Field, Def Depot Memphis Date Reported: 8/21/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0224/SDC/025

Sample #: 003 Date Sampled: 08/11/00 10:00 Date Received: 08/12/00 Matrix: SOLID

Trace Inductively Coupled Plasma (ICP) Metals				Reviewed
Arsenic	9.5	1.2	mg/kg	SW846 6010B

Inductively Coupled Plasma (ICP) Metals TCLP				Reviewed	
Silver	TCLP	ND	0.5	mg/L	SW846 6010B
Arsenic	TCLP	0.19 B	0.5	mg/L	SW846 6010B
Barium	TCLP	1.0 B	10	mg/L	SW846 6010B
Cadmium	TCLP	ND	0.1	mg/L	SW846 6010B
Chromium	TCLP	ND	0.5	mg/L	SW846 6010B
Lead	TCLP	ND	0.5	mg/L	SW846 6010B
Selenium	TCLP	ND	0.25	mg/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor) TCLP				Reviewed	
Mercury	TCLP	ND	0.0002	mg/L	SW846 7470A

1 Estimated result. Result is less than RL.

Organochlorine Pesticides TCLP				Reviewed
Chlordane (technical)	ND	0.0050	mg/L	SW846 8081A
Endrin	ND	0.00050	mg/L	SW846 8081A
Heptachlor	ND	0.00050	mg/L	SW846 8081A
Heptachlor epoxide	ND	0.00050	mg/L	SW846 8081A
Lindane	ND	0.00050	mg/L	SW846 8081A
Methoxychlor	ND	0.0010	mg/L	SW846 8081A
Toxaphene	ND	0.020	mg/L	SW846 8081A

Chlorinated Herbicides by GC TCLP				Reviewed
2,4-D	ND	0.040	mg/L	SW846 8151A
2,4,5-TP (Silvex)	ND	0.010	mg/L	SW846 8151A

Volatile Organics by GC/MS TCLP				Reviewed
Benzene	ND	0.050	mg/L	SW846 8260B
2-Butanone	ND	0.050	mg/L	SW846 8260B
Carbon tetrachloride	ND	0.050	mg/L	SW846 8260B
Chlorobenzene	ND	0.050	mg/L	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES, 1. .

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH120157 UXB International PAGE 6
 Dunn Field, Def Depot Memphis Date Reported: 8/21/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
-----------	--------	--------------------	-------	----------------------

Client Sample ID: DE/S1/0224/SDC/025

Sample #: 003 Date Sampled: 08/11/00 10:00 Date Received: 08/12/00 Matrix: SOLID

Volatile Organics by GC/MS TCLP

Chloroform	ND	0.050	mg/L	SW846 8260B	Reviewed
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8260B	
1,1-Dichloroethene	ND	0.050	mg/L	SW846 8260B	
Tetrachloroethene	ND	0.050	mg/L	SW846 8260B	
Trichloroethene	ND	0.050	mg/L	SW846 8260B	
Vinyl chloride	ND	0.050	mg/L	SW846 8260B	

Semivolatile Organic Compounds by GC/MS TCLP

1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270C	Reviewed
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270C	
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270C	
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270C	
Hexachloroethane	ND	0.050	mg/L	SW846 8270C	
Nitrobenzene	ND	0.050	mg/L	SW846 8270C	
Pentachlorophenol	ND	0.25	mg/L	SW846 8270C	
Pyridine	ND	0.10	mg/L	SW846 8270C	
2,4,5-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C	
2,4,6-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C	
Cresols (total)	ND	0.050	mg/L	SW846 8270C	

Inorganic Analysis

Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3	Reviewed
Ignitability	NO	--	No Units	SW846 SECTION 7.1	
Soil and Waste pH	7.7		No Units	SW846 9045C	
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4	
Total Residue as Percent Solids	86.0		%	MCAWW 160.3 MOD	

SEVERN TRENT LABORATORIES, L.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH160154 UKB International PAGE 1
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UKB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0228/SDC/026

Sample #: 001 Date Sampled: 08/15/00 10:00 Date Received: 08/16/00 Matrix: SOLID

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Arsenic	9.5	1.3	mg/kg	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals TCLP					Reviewed
Silver	TCLP	ND	0.5	mg/L	SW846 6010B
Arsenic	TCLP	0.12 B	0.5	mg/L	SW846 6010B
Barium	TCLP	0.98 B	10	mg/L	SW846 6010B
Cadmium	TCLP	ND	0.1	mg/L	SW846 6010B
Chromium	TCLP	ND	0.5	mg/L	SW846 6010B
Lead	TCLP	ND	0.5	mg/L	SW846 6010B
Selenium	TCLP	ND	0.25	mg/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor) TCLP					Reviewed
Mercury	TCLP	0.000097 B	0.0002	mg/L	SW846 7470A

1 Estimated result. Result is less than RL.

Organochlorine Pesticides TCLP					Reviewed
Chlordane (technical)	ND	0.0050	mg/L	SW846 8081A	
Endrin	ND	0.00050	mg/L	SW846 8081A	
Heptachlor	ND	0.00050	mg/L	SW846 8081A	
Heptachlor epoxide	ND	0.00050	mg/L	SW846 8081A	
Lindane	ND	0.00050	mg/L	SW846 8081A	
Methoxychlor	ND	0.0010	mg/L	SW846 8081A	
Toxaphene	ND	0.020	mg/L	SW846 8081A	

Chlorinated Herbicides by GC TCLP					Reviewed
2,4-D	ND	0.040	mg/L	SW846 8151A	
2,4,5-TP (Silvex)	ND	0.010	mg/L	SW846 8151A	

Volatile Organics by GC/MS TCLP					Reviewed
Benzene	ND	0.050	mg/L	SW846 8260B	
2-Butanone	ND	0.050	mg/L	SW846 8260B	
Carbon tetrachloride	ND	0.050	mg/L	SW846 8260B	
Chlorobenzene	ND	0.050	mg/L	SW846 8260B	

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SEVERN TRENT LABORATORIES, 1.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH160154 UXB International PAGE 2
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0228/SDC/026

Sample #: 001 Date Sampled: 08/15/00 10:00 Date Received: 08/16/00 Matrix: SOLID

Volatile Organics by GC/MS TCLP

Chloroform	ND	0.050	mg/L	SW846 8260B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8260B
1,1-Dichloroethene	ND	0.050	mg/L	SW846 8260B
Tetrachloroethene	ND	0.050	mg/L	SW846 8260B
Trichloroethene	ND	0.050	mg/L	SW846 8260B
Vinyl chloride	ND	0.050	mg/L	SW846 8260B

Reviewed

Semivolatile Organic Compounds by GC/MS TCLP

1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270C
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270C
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270C
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270C
Hexachloroethane	ND	0.050	mg/L	SW846 8270C
Nitrobenzene	ND	0.050	mg/L	SW846 8270C
Pentachlorophenol	ND	0.25	mg/L	SW846 8270C
Pyridine	ND	0.10	mg/L	SW846 8270C
2,4,5-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
2,4,6-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
Cresols (total)	ND	0.050	mg/L	SW846 8270C

Reviewed

Inorganic Analysis

Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3
Ignitability	NO	--	No Units	SW846 SECTION 7.1
Soil and Waste pH	8.1		No Units	SW846 9045C
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4
Total Residue as Percent Solids	79.7		%	MCAWW 160.3 MOD

Reviewed

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SEVERN TRENT LABORATORIES, L.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C0H160154 UXB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0228/SDC/027

Sample #: 002 Date Sampled: 08/15/00 10:00 Date Received: 08/16/00 Matrix: SOLID

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Arsenic	10.5	1.3	mg/kg	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals TCLP					Reviewed
Silver	TCLP	ND	0.5	mg/L	SW846 6010B
Arsenic	TCLP	0.13 B	0.5	mg/L	SW846 6010B
Barium	TCLP	1.0 B	10	mg/L	SW846 6010B
Cadmium	TCLP	ND	0.1	mg/L	SW846 6010B
Chromium	TCLP	ND	0.5	mg/L	SW846 6010B
Lead	TCLP	ND	0.5	mg/L	SW846 6010B
Selenium	TCLP	ND	0.25	mg/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor) TCLP					Reviewed
Mercury	TCLP	ND	0.0002	mg/L	SW846 7470A

1 Estimated result. Result is less than RL.

Organochlorine Pesticides TCLP					Reviewed
Chlordane (technical)	ND	0.0050	mg/L	SW846 8081A	
Endrin	ND	0.00050	mg/L	SW846 8081A	
Heptachlor	ND	0.00050	mg/L	SW846 8081A	
Heptachlor epoxide	ND	0.00050	mg/L	SW846 8081A	
Lindane	ND	0.00050	mg/L	SW846 8081A	
Methoxychlor	ND	0.0010	mg/L	SW846 8081A	
Toxaphene	ND	0.020	mg/L	SW846 8081A	

Chlorinated Herbicides by GC TCLP					Reviewed
2,4-D	ND	0.040	mg/L	SW846 8151A	
2,4,5-TP (Silver)	ND	0.010	mg/L	SW846 8151A	

Volatile Organics by GC/MS TCLP					Reviewed
Benzene	ND	0.050	mg/L	SW846 8260B	
2-Butanone	ND	0.050	mg/L	SW846 8260B	
Carbon tetrachloride	ND	0.050	mg/L	SW846 8260B	
Chlorobenzene	ND	0.050	mg/L	SW846 8260B	

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SEVERN TRENT LABORATORIES, I

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to
 change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH160154 UXB International PAGE 4
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0228/SDC/027

Sample #: 002 Date Sampled: 08/15/00 10:00 Date Received: 08/16/00 Matrix: SOLID

Volatile Organics by GC/MS TCLP

Chloroform	ND	0.050	mg/L	SW846 8260B	Reviewed
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8260B	
1,1-Dichloroethene	ND	0.050	mg/L	SW846 8260B	
Tetrachloroethene	ND	0.050	mg/L	SW846 8260B	
Trichloroethene	ND	0.050	mg/L	SW846 8260B	
Vinyl chloride	ND	0.050	mg/L	SW846 8260B	

Semivolatile Organic Compounds by GC/MS TCLP

1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270C	Reviewed
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270C	
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270C	
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270C	
Hexachloroethane	ND	0.050	mg/L	SW846 8270C	
Nitrobenzene	ND	0.050	mg/L	SW846 8270C	
Pentachlorophenol	ND	0.25	mg/L	SW846 8270C	
Pyridine	ND	0.10	mg/L	SW846 8270C	
2,4,5-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C	
2,4,6-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C	
Cresols (total)	ND	0.050	mg/L	SW846 8270C	

Inorganic Analysis

Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3	Reviewed
Ignitability	NO	--	No Units	SW846 SECTION 7.1	
Soil and Waste pH	8.1		No Units	SW846 9045C	
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4	
Total Residue as Percent Solids	79.0		%	MCAWW 160.3 MOD	

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PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C0H160154 UKB International PAGE 5
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UKB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0228/SDC/028

Sample #: 003 Date Sampled: 08/15/00 10:00 Date Received: 08/16/00 Matrix: SOLID

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Arsenic	9.0	1.2	mg/kg	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals TCLP					Reviewed
Silver	TCLP	ND	0.5	mg/L	SW846 6010B
Arsenic	TCLP	0.15 B	0.5	mg/L	SW846 6010B
Barium	TCLP	0.95 B	10	mg/L	SW846 6010B
Cadmium	TCLP	ND	0.1	mg/L	SW846 6010B
Chromium	TCLP	0.0058 B	0.5	mg/L	SW846 6010B
Lead	TCLP	0.16 B	0.5	mg/L	SW846 6010B
Selenium	TCLP	ND	0.25	mg/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor) TCLP					Reviewed
Mercury	TCLP	0.000067 B	0.0002	mg/L	SW846 7470A

B Estimated result. Result is less than RL.

Organochlorine Pesticides TCLP					Reviewed
Chlordane (technical)	ND	0.0050	mg/L	SW846 8081A	
Endrin	ND	0.00050	mg/L	SW846 8081A	
Heptachlor	ND	0.00050	mg/L	SW846 8081A	
Heptachlor epoxide	ND	0.00050	mg/L	SW846 8081A	
Lindane	ND	0.00050	mg/L	SW846 8081A	
Methoxychlor	ND	0.0010	mg/L	SW846 8081A	
Toxaphene	ND	0.020	mg/L	SW846 8081A	

Chlorinated Herbicides by GC TCLP					Reviewed
2,4-D	ND	0.040	mg/L	SW846 8151A	
2,4,5-TP (Silvex)	ND	0.010	mg/L	SW846 8151A	

Volatile Organics by GC/MS TCLP					Reviewed
Benzene	ND	0.050	mg/L	SW846 8260B	
2-Butanone	ND	0.050	mg/L	SW846 8260B	
Carbon tetrachloride	ND	0.050	mg/L	SW846 8260B	
Chlorobenzene	ND	0.050	mg/L	SW846 8260B	

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SEVERN TRENT LABORATORIES, L. .

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH160154 UXB International PAGE 6
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0228/SDC/028

Sample #: 003 Date Sampled: 08/15/00 10:00 Date Received: 08/16/00 Matrix: SOLID

Volatile Organics by GC/MS TCLP

Chloroform	ND	0.050	mg/L	SW846 8260B	Reviewed
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8260B	
1,1-Dichloroethene	ND	0.050	mg/L	SW846 8260B	
Tetrachloroethene	ND	0.050	mg/L	SW846 8260B	
Trichloroethene	ND	0.050	mg/L	SW846 8260B	
Vinyl chloride	ND	0.050	mg/L	SW846 8260B	

Semivolatile Organic Compounds by GC/MS TCLP

1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270C	Reviewed
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270C	
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270C	
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270C	
Hexachloroethane	ND	0.050	mg/L	SW846 8270C	
Nitrobenzene	ND	0.050	mg/L	SW846 8270C	
Pentachlorophenol	ND	0.25	mg/L	SW846 8270C	
Pyridine	ND	0.10	mg/L	SW846 8270C	
2,4,5-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C	
2,4,6-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C	
Cresols (total)	ND	0.050	mg/L	SW846 8270C	

Inorganic Analysis

Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3	Reviewed
Ignitability	NO	--	No Units	SW846 SECTION 7.1	
Soil and Waste pH	8.1		No Units	SW846 9045C	
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4	
Total Residue as Percent Solids	85.0		%	MCAWW 160.3 MOD	

SEVERN TRENT LABORATORIES, L...

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH220139 UKB International PAGE 1
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0234/SDC/029

Sample #: 001 Date Sampled: 08/21/00 10:00 Date Received: 08/22/00 Matrix: SOLID

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Arsenic	8.0	1.2	mg/kg	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals TCLP					Reviewed
Silver	TCLP	ND	0.5	mg/L	SW846 6010B
Arsenic	TCLP	0.15 B	0.5	mg/L	SW846 6010B
Barium	TCLP	1.3 B	10	mg/L	SW846 6010B
Cadmium	TCLP	ND	0.1	mg/L	SW846 6010B
Chromium	TCLP	ND	0.5	mg/L	SW846 6010B
Lead	TCLP	ND	0.5	mg/L	SW846 6010B
Selenium	TCLP	ND	0.25	mg/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor) TCLP					Reviewed
Mercury	TCLP	0.000098 B	0.0002	mg/L	SW846 7470A

B Estimated result. Result is less than RL.

Organochlorine Pesticides TCLP					Reviewed
Chlordane (technical)	ND	0.0050	mg/L	SW846 8081A	
Endrin	ND	0.00050	mg/L	SW846 8081A	
Heptachlor	ND	0.00050	mg/L	SW846 8081A	
Heptachlor epoxide	ND	0.00050	mg/L	SW846 8081A	
Lindane	ND	0.00050	mg/L	SW846 8081A	
Methoxychlor	ND	0.0010	mg/L	SW846 8081A	
Toxaphene	ND	0.020	mg/L	SW846 8081A	

Chlorinated Herbicides by GC TCLP					Reviewed
2,4-D	ND	0.040	mg/L	SW846 8151A	
2,4,5-TP (Silvex)	ND	0.010	mg/L	SW846 8151A	

Volatile Organics by GC/MS TCLP					Reviewed
Benzene	ND	0.050	mg/L	SW846 8260B	
2-Butanone	0.030 J	0.050	mg/L	SW846 8260B	
Carbon tetrachloride	ND	0.050	mg/L	SW846 8260B	
Chlorobenzene	ND	0.050	mg/L	SW846 8260B	

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SEVERN TRENT LABORATORIES, L...

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH220139 UXB International PAGE 2
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0234/SDC/029

Sample #: 001 Date Sampled: 08/21/00 10:00 Date Received: 08/22/00 Matrix: SOLID

Volatile Organics by GC/MS TCLP

Reviewed

Chloroform	ND	0.050	mg/L	SW846 8260B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8260B
1,1-Dichloroethene	ND	0.050	mg/L	SW846 8260B
Tetrachloroethene	ND	0.050	mg/L	SW846 8260B
Trichloroethene	ND	0.050	mg/L	SW846 8260B
Vinyl chloride	ND	0.050	mg/L	SW846 8260B

J Estimated result. Result is less than RL.

Semivolatile Organic Compounds by GC/MS TCLP

Reviewed

1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270C
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270C
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270C
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270C
Hexachloroethane	ND	0.050	mg/L	SW846 8270C
Nitrobenzene	ND	0.050	mg/L	SW846 8270C
Pentachlorophenol	ND	0.25	mg/L	SW846 8270C
Pyridine	ND	0.10	mg/L	SW846 8270C
2,4,5-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
2,4,6-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
Cresols (total)	ND	0.050	mg/L	SW846 8270C

Inorganic Analysis

Reviewed

Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3
Ignitability	NO	--	No Units	SW846 SECTION 7.1
Soil and Waste pH	7.1		No Units	SW846 9045C
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4
Total Residue as Percent Solids	86.0		%	MCAWW 160.3 MOD

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PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COHZZ0139 UKB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0234/SDC/030

Sample #: 002 Date Sampled: 08/21/00 10:00 Date Received: 08/22/00 Matrix: SOLID

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Arsenic	9.3	1.2	mg/kg	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals TCLP					Reviewed
Silver	TCLP	ND	0.5	mg/L	SW846 6010B
Arsenic	TCLP	0.17 B	0.5	mg/L	SW846 6010B
Barium	TCLP	1.2 B	10	mg/L	SW846 6010B
Cadmium	TCLP	ND	0.1	mg/L	SW846 6010B
Chromium	TCLP	0.0062 B	0.5	mg/L	SW846 6010B
Lead	TCLP	0.080 B	0.5	mg/L	SW846 6010B
Selenium	TCLP	ND	0.25	mg/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor) TCLP					Reviewed
Mercury	TCLP	0.000068 B	0.0002	mg/L	SW846 7470A

§ Estimated result. Result is less than RL.

Organochlorine Pesticides TCLP					Reviewed
Chlordane (technical)	ND	0.0050	mg/L	SW846 8081A	
Endrin	ND	0.00050	mg/L	SW846 8081A	
Heptachlor	ND	0.00050	mg/L	SW846 8081A	
Heptachlor epoxide	ND	0.00050	mg/L	SW846 8081A	
Lindane	ND	0.00050	mg/L	SW846 8081A	
Methoxychlor	ND	0.0010	mg/L	SW846 8081A	
Toxaphene	ND	0.020	mg/L	SW846 8081A	

Chlorinated Herbicides by GC TCLP					Reviewed
2,4-D	ND	0.040	mg/L	SW846 8151A	
2,4,5-TP (Silvex)	ND	0.010	mg/L	SW846 8151A	

Volatile Organics by GC/MS TCLP					Reviewed
Benzene	ND	0.050	mg/L	SW846 8260B	
2-Butanone	0.030 J	0.050	mg/L	SW846 8260B	
Carbon tetrachloride	ND	0.050	mg/L	SW846 8260B	
Chlorobenzene	ND	0.050	mg/L	SW846 8260B	

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SEVERN TRENT LABORATORIES, 1

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH220139 UXB International PAGE 4
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Client Sample ID: DF/S1/0234/SDC/030				
Sample #: 002 Date Sampled: 08/21/00 10:00 Date Received: 08/22/00 Matrix: SOLID				
Volatile Organics by GC/MS TCLP				
Chloroform	ND	0.050	mg/L	SW846 8260B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8260B
1,1-Dichloroethene	ND	0.050	mg/L	SW846 8260B
Tetrachloroethene	ND	0.050	mg/L	SW846 8260B
Trichloroethene	ND	0.050	mg/L	SW846 8260B
Vinyl chloride	ND	0.050	mg/L	SW846 8260B

Reviewed

J Estimated result. Result is less than RL.

Semivolatile Organic Compounds by GC/MS TCLP

1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270C
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270C
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270C
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270C
Hexachloroethane	ND	0.050	mg/L	SW846 8270C
Nitrobenzene	ND	0.050	mg/L	SW846 8270C
Pentachlorophenol	ND	0.25	mg/L	SW846 8270C
Pyridine	ND	0.10	mg/L	SW846 8270C
2,4,5-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
2,4,6-Trichloro-phenol	ND	0.050	mg/L	SW846 8270C
Cresols (total)	ND	0.050	mg/L	SW846 8270C

Reviewed

Inorganic Analysis

Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3
Ignitability	NO	--	No Units	SW846 SECTION 7.1
Soil and Waste pH	7.8		No Units	SW846 9045C
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4
Total Residue as Percent Solids	85.4		%	MCAWW 160.3 MOD

Reviewed

(Continued on next page)

Site 1 Water

DRAFT



DR WILLIE W. HERENTON - Mayor
RICK MASSON - Chief Administrative Officer
DIVISION OF PUBLIC WORKS
JERRY R. COLLINS JR. - Director
Environmental Engineering

Monday, June 19, 2000

Mr Frank Johnson
Senior UXO Supervisor
UXO International Inc.
21641 Beaumeade Circle, Suite 301
Ashburn, Virginia 20147-6002

RE Request for disposal of groundwater
Dunn Field, Defense Depot, Memphis, Tennessee

Dear Mr. Johnson

We have received and approve your request to discharge of 1,155 gallons of rain water run-off was collected into an excavation areas at the above referenced site. This wastewater has been stored in 55-gallon drums at the Depot. The discharge point is a manhole located at Kyle Street at the west property line of the Defense Depot.

This approval is for this batch of treated groundwater only.

If you should have any questions, please feel free to contact me at (901)353-2392.

Sincerely,

Akil AL-Chokhachi
Environmental Engineer

cc: Rodney Thomas
Shawn Phillips- Defense Depot, Memphis



UXB International, Inc. - Demining - Ordnance and Explosive Waste Services

June 14, 2000

Mr. Akil Al-Chokahachi
City of Memphis Public Works
2303 North Second Street
Memphis, TN 38127-7500

Re: Discharge of water into the City of Memphis Sewer System;
Permit Request

Dear Mr. Chokahachi,

Pursuant to our phone conversation on June 7th, I am requesting authorization to discharge 1,155 gallons of water into the Memphis sewer system.

UXB International, Inc., under contract with the Corps of Engineers, is currently conducting excavation at the Dunn Field area of the former Defense Depot, Memphis, Tennessee.

During the last week of May, heavy rains filled the excavation pit with approximately 1,155 gallons of rain runoff. This water was collected in 55-gallon drums and tested, by the Edgewood Chemical and Biological Center, for the presence of chemical warfare material (CWM). All tests were negative for the presence of CWM.

After laboratory clearance of CWM was obtained, samples were sent to Severn Trent Laboratories for HTW analysis. A copy of the sample data summary is provided as an attachment to this document.

The sample results show no value that would preclude discharge into the sewer system or would warrant its classification as a hazardous waste.

To the best of my knowledge and belief, the contained water does not contain any hazardous chemicals, nor should it be classified as hazardous waste. No chemicals have been introduced to the water or to the surrounding area by UXB or the other supporting agencies working on this project. This water resulted solely from rain that migrated into the excavation pit.

If the permit is approved, please mail to:

Mr. Frank Johnson
(RM 412)
Residence Inn
6141 Old Poplar Pike
Memphis, TN 38119

Or fax to (901) 745-4280.

Once a permit is obtained from the City of Memphis Public Works, I intend to discharge the water at the sewer inlet located near the corner of Kyle Street and Menager Street (adjacent to Dunn Field).

Should you have any questions or concerns regarding this request, please contact me at (901) 745-4999 or my cellular phone (703) 625-3792.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Johnson". The signature is fluid and cursive, with the first name "Frank" and last name "Johnson" clearly distinguishable.

Frank Johnson
Senior UXO Supervisor

SEVERN TRENT LABORATORIES, .

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C0E230195 UKS International PAGE 1
 Dunn Field, Def Depot Memphis Date Reported: 6/01/00
 Project Number: UKS 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: [REDACTED]
 Sample #: 001 Date Sampled: 05/22/00 13:11 Date Received: 05/23/00 Matrix: WATER

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Silver	ND	10	ug/L	SW846 6010B	
Arsenic	6.4 B	10	ug/L	SW846 6010B	
Cadmium	ND	5	ug/L	SW846 6010B	
Chromium	10.1	10	ug/L	SW846 6010B	
Lead	22.5	3	ug/L	SW846 6010B	
Antimony	1.5 B	60	ug/L	SW846 6010B	
Selenium	ND	5	ug/L	SW846 6010B	
Thallium	ND	10	ug/L	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals					Reviewed
Aluminum	7010 N	200	ug/L	SW846 6010B	
Barium	208	200	ug/L	SW846 6010B	
Beryllium	0.20 B	5	ug/L	SW846 6010B	
Calcium	38100	5000	ug/L	SW846 6010B	
Cobalt	ND	50	ug/L	SW846 6010B	
Copper	16.6 B	25	ug/L	SW846 6010B	
Iron	6870	100	ug/L	SW846 6010B	
Potassium	4140 B	5000	ug/L	SW846 6010B	
Magnesium	5500	5000	ug/L	SW846 6010B	
Manganese	79.8	15	ug/L	SW846 6010B	
Sodium	1200 B	5000	ug/L	SW846 6010B	
Nickel	11.7 B	40	ug/L	SW846 6010B	
Vanadium	13.0 B	50	ug/L	SW846 6010B	
Zinc	49.1	20	ug/L	SW846 6010B	

Mercury in Liquid Waste (Manual Cold-Vapor)					Reviewed
Mercury	ND	0.2	ug/L	SW846 7470A	

B Estimated result. Result is less than RL.
 N Spiked analyte recovery is outside stated control limits.

Organochlorine Pesticides					Reviewed
alpha-BHC	ND	0.050	ug/L	SW846 8081A	
beta-BHC	ND	0.050	ug/L	SW846 8081A	
delta-BHC	ND	0.050	ug/L	SW846 8081A	
gamma-BHC (Lindane)	ND	0.050	ug/L	SW846 8081A	

(Continued on next page)

SEVERN TRENT LABORATORIES, L.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COE230195 UXB International PAGE 2
 Dunn Field, Def Depot Memphis Date Reported: 6/01/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0137/WA/001

Sample #: 001 Date Sampled: 05/22/00 13:11 Date Received: 05/23/00 Matrix: WATER

Organochlorine Pesticides				Reviewed
Heptachlor	ND	0.050	ug/L	SW846 8081A
Aldrin	ND	0.050	ug/L	SW846 8081A
Heptachlor epoxide	ND	0.050	ug/L	SW846 8081A
Endosulfan I	ND	0.050	ug/L	SW846 8081A
Dieldrin	ND	0.050	ug/L	SW846 8081A
4,4'-DDE	ND	0.050	ug/L	SW846 8081A
Endrin	ND	0.050	ug/L	SW846 8081A
Endrin ketone	ND	0.050	ug/L	SW846 8081A
Endrin aldehyde	ND	0.050	ug/L	SW846 8081A
Endosulfan II	ND	0.050	ug/L	SW846 8081A
4,4'-DDD	ND	0.050	ug/L	SW846 8081A
Endosulfan sulfate	ND	0.050	ug/L	SW846 8081A
4,4'-DDT	ND	0.050	ug/L	SW846 8081A
Methoxychlor	ND	0.10	ug/L	SW846 8081A
alpha-Chlordane	ND	0.050	ug/L	SW846 8081A
gamma-Chlordane	ND	0.050	ug/L	SW846 8081A
Toxaphene	ND	2.0	ug/L	SW846 8081A

PCBs by SW-846 8082				Reviewed
Aroclor 1016	ND	1.0	ug/L	SW846 8082
Aroclor 1221	ND	1.0	ug/L	SW846 8082
Aroclor 1232	ND	1.0	ug/L	SW846 8082
Aroclor 1242	ND	1.0	ug/L	SW846 8082
Aroclor 1248	ND	1.0	ug/L	SW846 8082
Aroclor 1254	ND	1.0	ug/L	SW846 8082
Aroclor 1260	ND	1.0	ug/L	SW846 8082

Chlorinated Herbicides by GC				Reviewed
2,4-D	ND	4.0	ug/L	SW846 8151A
2,4,5-TP (Silvex)	ND	1.0	ug/L	SW846 8151A

Volatile Organics by GC/MS				Reviewed
Acetone	2.1 J	20	ug/L	SW846 8260B
Benzene	ND	5.0	ug/L	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES,

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C0E230195 UXB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 6/01/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0137/WA/001

Sample #: 001 Date Sampled: 05/22/00 13:11 Date Received: 05/23/00 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

Bromodichloromethane	ND	5.0	ug/L	SW846 8260B
Bromoform	ND	5.0	ug/L	SW846 8260B
Bromomethane	ND	10	ug/L	SW846 8260B
2-Butanone	ND	20	ug/L	SW846 8260B
Carbon disulfide	ND	5.0	ug/L	SW846 8260B
Carbon tetrachloride	ND	5.0	ug/L	SW846 8260B
Chlorobenzene	ND	5.0	ug/L	SW846 8260B
Dibromochloromethane	ND	5.0	ug/L	SW846 8260B
Chloroethane	ND	10	ug/L	SW846 8260B
Chloroform	ND	5.0	ug/L	SW846 8260B
Chloromethane	ND	10	ug/L	SW846 8260B
1,1-Dichloroethane	ND	5.0	ug/L	SW846 8260B
1,2-Dichloroethane	ND	5.0	ug/L	SW846 8260B
1,1-Dichloroethene	ND	5.0	ug/L	SW846 8260B
1,2-Dichloroethene	ND	5.0	ug/L	SW846 8260B
(total)				
1,2-Dichloropropane	ND	5.0	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	5.0	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	5.0	ug/L	SW846 8260B
Ethylbenzene	ND	5.0	ug/L	SW846 8260B
2-Hexanone	ND	20	ug/L	SW846 8260B
Methylene chloride	ND	5.0	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	20	ug/L	SW846 8260B
Styrene	ND	5.0	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	5.0	ug/L	SW846 8260B
Tetrachloroethene	ND	5.0	ug/L	SW846 8260B
Toluene	ND	5.0	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	5.0	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	5.0	ug/L	SW846 8260B
Trichloroethene	ND	5.0	ug/L	SW846 8260B
Vinyl chloride	ND	10	ug/L	SW846 8260B
Xylenes (total)	ND	5.0	ug/L	SW846 8260B

J Estimated result. Result is less than RL.

(Continued on next page)

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COE230195 UXB International PAGE 4
 Dunn Field, Def Depot Memphis Date Reported: 6/01/00
 Project Number: UXB 7512-050

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0137/WA/001

Sample #: 001 Date Sampled: 05/22/00 13:11 Date Received: 05/23/00 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

Pyridine	ND	20	ug/L	SW846 8270C
Acenaphthene	ND	10	ug/L	SW846 8270C
Acenaphthylene	ND	10	ug/L	SW846 8270C
Anthracene	ND	10	ug/L	SW846 8270C
Benzo(a)anthracene	ND	10	ug/L	SW846 8270C
Benzo(a)pyrene	ND	10	ug/L	SW846 8270C
Benzo(b)fluoranthene	ND	10	ug/L	SW846 8270C
Benzo(k)fluoranthene	ND	10	ug/L	SW846 8270C
Benzo(ghi)perylene	ND	10	ug/L	SW846 8270C
bis(2-Chloroethoxy) methane	ND	10	ug/L	SW846 8270C
bis(2-Chloroethyl)- ether	ND	10	ug/L	SW846 8270C
bis(2-Ethylhexyl) phthalate	ND	10	ug/L	SW846 8270C
4-Bromophenyl phenyl ether	ND	10	ug/L	SW846 8270C
Butyl benzyl phthalate	ND	10	ug/L	SW846 8270C
Carbazole	ND	10	ug/L	SW846 8270C
4-Chloroaniline	ND	10	ug/L	SW846 8270C
4-Chloro-3-methylphenol	ND	10	ug/L	SW846 8270C
2-Chloronaphthalene	ND	10	ug/L	SW846 8270C
2-Chlorophenol	ND	10	ug/L	SW846 8270C
4-Chlorophenyl phenyl ether	ND	10	ug/L	SW846 8270C
Chrysene	ND	10	ug/L	SW846 8270C
Dibenz(a,h)anthracene	ND	10	ug/L	SW846 8270C
Dibenzofuran	ND	10	ug/L	SW846 8270C
1,2-Dichlorobenzene	ND	10	ug/L	SW846 8270C
1,3-Dichlorobenzene	ND	10	ug/L	SW846 8270C
1,4-Dichlorobenzene	ND	10	ug/L	SW846 8270C
3,3'-Dichlorobenzidine	ND	50	ug/L	SW846 8270C
2,4-Dichlorophenol	ND	10	ug/L	SW846 8270C
Diethyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dimethylphenol	ND	10	ug/L	SW846 8270C
Dimethyl phthalate	ND	10	ug/L	SW846 8270C

(Continued on next page)

SEVERN TRENT LABORATORIES, 1.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COE230195 UXB International PAGE 5
 Dunn Field, Def Depot Memphis Date Reported: 6/01/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0137/WA/001

Sample #: 001 Date Sampled: 05/22/00 13:11 Date Received: 05/23/00 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

Di-n-butyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-octyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dinitrophenol	ND	50	ug/L	SW846 8270C
4,6-Dinitro-2-methylphenol	ND	50	ug/L	SW846 8270C
2,4-Dinitrotoluene	ND	10	ug/L	SW846 8270C
2,6-Dinitrotoluene	ND	10	ug/L	SW846 8270C
Fluoranthene	ND	10	ug/L	SW846 8270C
Fluorene	ND	10	ug/L	SW846 8270C
Hexachlorobenzene	ND	10	ug/L	SW846 8270C
Hexachlorobutadiene	ND	10	ug/L	SW846 8270C
Hexachlorocyclopentadiene	ND	50	ug/L	SW846 8270C
Hexachloroethane	ND	10	ug/L	SW846 8270C
Indeno(1,2,3-cd)pyrene	ND	10	ug/L	SW846 8270C
Isophorone	ND	10	ug/L	SW846 8270C
2-Methylnaphthalene	ND	10	ug/L	SW846 8270C
2-Methylphenol	ND	10	ug/L	SW846 8270C
4-Methylphenol	ND	10	ug/L	SW846 8270C
Naphthalene	ND	10	ug/L	SW846 8270C
2-Nitroaniline	ND	50	ug/L	SW846 8270C
3-Nitroaniline	ND	50	ug/L	SW846 8270C
4-Nitroaniline	ND	50	ug/L	SW846 8270C
Nitrobenzene	ND	10	ug/L	SW846 8270C
2-Nitrophenol	ND	10	ug/L	SW846 8270C
4-Nitrophenol	ND	50	ug/L	SW846 8270C
N-Nitrosodi-n-propylamine	ND	10	ug/L	SW846 8270C
N-Nitrosodiphenylamine	ND	10	ug/L	SW846 8270C
2,2'-oxybis(1-Chloropropane)	ND	10	ug/L	SW846 8270C
Pentachlorophenol	ND	50	ug/L	SW846 8270C
Phenanthrene	ND	10	ug/L	SW846 8270C
Phenol	ND	10	ug/L	SW846 8270C
Pyrene	ND	10	ug/L	SW846 8270C
1,2,4-Trichlorobenzene	ND	10	ug/L	SW846 8270C
2,4,5-Trichlorophenol	ND	10	ug/L	SW846 8270C
2,4,6-Trichlorophenol	ND	10	ug/L	SW846 8270C

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654 261

SEVERN TRENT LABORATORIES, L.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C0E230195 UXB International PAGE 6
Dunn Field, Def Depot Memphis Date Reported: 6/01/00
Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0137/WA/001

Sample #: 001 Date Sampled: 05/22/00 13:11 Date Received: 05/23/00 Matrix: WATER

Inorganic Analysis	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	Reviewed
Cyanide, Total	ND	10.0	ug/L	SW846 9012A	
Pensky-Martens Method for Determining Ignitability	>200		deg F	SW846 1010	
pH Aqueous	8.3		No Units	SW846 9040	
Sulfide	183	1.0	mg/L	NCAWW 376.1	

City of Memphis

TENNESSEE

DR. WILLIE W. HERENTON - Mayor
RICK MASSON - Chief Administrative Officer
DIVISION OF PUBLIC WORKS
JERRY R. COLLINS JR. - Director
Maynard C. Stiles Wastewater Treatment Plant

Friday, July 21, 2000

Mr. Frank Johnson
Project Manager
UXO International Inc.
21641 Beauneade Circle, Suite 301
Ashburn, Virginia 20147-6002

RE: Request for disposal of rinse water
Dunn Field, Defense Depot, Memphis, Tennessee

Dear Mr. Johnson:

We have received and approve your request to discharge 555 gallons of rinse water into sanitary sewer system at the above referenced site. This wastewater was generated from rinsing protective clothing during soil excavation and has been stored in a tank at the Depot. The discharge point is a manhole located at Kyle Street at the west property line of the Defense Depot.

This approval is for this batch of treated groundwater only.

If you should have any questions, please feel free to contact me at (901)353-2392.

Sincerely,


Akil AL-Chokhachi
Environmental Engineer

cc: Rodney Thomas
Shawn Phillips - Memphis Depot Caretaker



UXB International, Inc. Demining - Ordnance and Explosive Waste Services

July 18, 2000

Mr. Akil Al-Chokahachi
City of Memphis Public Works
2303 North Second Street
Memphis, TN 38127-7500

Re: Discharge of water into the City of Memphis Sewer System;
Permit Request

Dear Mr. Chokahachi,

I am requesting authorization to discharge 550 gallons of water into the Memphis sewer system. The water is currently stored in ten 55-gallons drums at Dunn Field, Memphis Defense Depot.

The water that I am requesting to discharge into the Memphis sewer system was used to rinse protective clothing worn by personnel working in the vapor containment structure at Dunn Field.

As you are aware UXB International, Inc., under contract with the Corps of Engineers, is currently conducting excavation at the Dunn Field area of the former Defense Depot, Memphis, Tennessee in pursuit of possible buried chemical warfare agents. To date, there has been no indication of these agents or other chemicals of concern. Soil analyses have not indicated the presence of chemical warfare agents, breakdown products, or other hazardous/toxic waste.

Only tap water mixed with mild soap and 5 percent sodium hypochlorite (common household bleach) was used to decontaminate personnel protective clothing.

The water was contained only as a precautionary measure and tested by an independent laboratory (Severn-Trent) for the presence of HTW. The test results are attached to this letter for your review. Moreover, the Edgewood Chemical and Biological Center tested water samples for the presence of chemical warfare agents. All tests were negative.

To the best of my knowledge and belief, the water does not contain any hazardous chemicals, nor is it classified as hazardous waste. Other than the mild soap and bleach, no chemicals have been introduced to the water.

I intend to discharge the water at the sewer inlet located near the corner of Kyle Street and Menager Street (adjacent to Dunn Field).

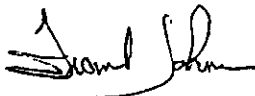
Please mail your response to:

Mr. Frank Johnson
1325 Landfair Dr. #103
Germantown, TN 38138

Or fax to (901) 745-4280.

Should you have any questions or concerns regarding this request, please contact me at (901) 745-4999 or my cellular phone (703) 625-3792.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Johnson", with a stylized flourish at the end.

Frank Johnson
Project Manager

654 265

SEVERN TRENT LABORATORIES NC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG200210 UXB International PAGE 1
 Dunn Field, Def Depot Memphis Date Reported: 7/27/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/201/WA/002

Sample #: 001 Date Sampled: 07/19/00 10:30 Date Received: 07/20/00 Matrix: WATER

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Silver	ND	10	ug/L	SW846 6010B	
Arsenic	4.8 B	10	ug/L	SW846 6010B	
Cadmium	ND	5	ug/L	SW846 6010B	
Chromium	2.6 B	10	ug/L	SW846 6010B	
Lead	ND	3	ug/L	SW846 6010B	
Antimony	1.7 B	60	ug/L	SW846 6010B	
Selenium	ND	5	ug/L	SW846 6010B	
Thallium	ND	10	ug/L	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals					Reviewed
Aluminum	533	200	ug/L	SW846 6010B	
Barium	76.8 B	200	ug/L	SW846 6010B	
Beryllium	0.11 B	5	ug/L	SW846 6010B	
Calcium	67800	5000	ug/L	SW846 6010B	
Cobalt	ND	50	ug/L	SW846 6010B	
Copper	9.8 B	25	ug/L	SW846 6010B	
Iron	661	100	ug/L	SW846 6010B	
Potassium	1850 B	5000	ug/L	SW846 6010B	
Magnesium	8230	5000	ug/L	SW846 6010B	
Manganese	18.1	15	ug/L	SW846 6010B	
Sodium	55700	5000	ug/L	SW846 6010B	
Nickel	ND	40	ug/L	SW846 6010B	
Vanadium	4.1 B	50	ug/L	SW846 6010B	
Zinc	15.4 B	20	ug/L	SW846 6010B	

Mercury in Liquid Waste (Manual Cold-Vapor)					Reviewed
Mercury	ND	0.2	ug/L	SW846 7470A	

B Estimated result. Result is less than RL.

Organochlorine Pesticides					Reviewed
alpha-BHC	ND	0.050	ug/L	SW846 8081A	
beta-BHC	ND	0.050	ug/L	SW846 8081A	
delta-BHC	ND	0.050	ug/L	SW846 8081A	
gamma-BHC (Lindane)	ND	0.050	ug/L	SW846 8081A	
Heptachlor	ND	0.050	ug/L	SW846 8081A	

(Continued on next page)

SEVERN TRENT LABORATORIES NC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG200210 UXB International PAGE 2
 Dunn Field, Def Depot Memphis Date Reported: 7/27/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/201/WA/002

Sample #: 001 Date Sampled: 07/19/00 10:30 Date Received: 07/20/00 Matrix: WATER

Organochlorine Pesticides

Reviewed

Aldrin	ND	0.050	ug/L	SW846 8081A
Heptachlor epoxide	ND	0.050	ug/L	SW846 8081A
Endosulfan I	ND	0.050	ug/L	SW846 8081A
Dieldrin	0.0049 J,P	0.050	ug/L	SW846 8081A
4,4'-DDE	ND	0.050	ug/L	SW846 8081A
Endrin	ND	0.050	ug/L	SW846 8081A
Endrin ketone	ND	0.050	ug/L	SW846 8081A
Endrin aldehyde	ND	0.050	ug/L	SW846 8081A
Endosulfan II	ND	0.050	ug/L	SW846 8081A
1,1'-DDD	ND	0.050	ug/L	SW846 8081A
Endosulfan sulfate	ND	0.050	ug/L	SW846 8081A
4,4'-DDT	ND	0.050	ug/L	SW846 8081A
Methoxychlor	ND	0.10	ug/L	SW846 8081A
alpha-Chlordane	ND	0.050	ug/L	SW846 8081A
gamma-Chlordane	ND	0.050	ug/L	SW846 8081A
Toxaphene	ND	2.0	ug/L	SW846 8081A

J Estimated result. Result is less than RL.

P The percent difference between the original and confirmation analyses is greater than 25%.

PCBs by SW-846 8082

Reviewed

Aroclor 1016	ND	1.0	ug/L	SW846 8082
Aroclor 1221	ND	1.0	ug/L	SW846 8082
Aroclor 1232	ND	1.0	ug/L	SW846 8082
Aroclor 1242	ND	1.0	ug/L	SW846 8082
Aroclor 1248	ND	1.0	ug/L	SW846 8082
Aroclor 1254	ND	1.0	ug/L	SW846 8082
Aroclor 1260	ND	1.0	ug/L	SW846 8082

Chlorinated Herbicides by GC

Reviewed

2,4-D	ND	4.0	ug/L	SW846 8151A
2,4,5-TP (Silvex)	ND	1.0	ug/L	SW846 8151A

(Continued on next page)

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG200210 UXB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 7/27/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/201/WA/002
 Sample #: 001 Date Sampled: 07/19/00 10:30 Date Received: 07/20/00 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

Acetone	ND	20	ug/L	SW846 8260B
Benzene	ND	5.0	ug/L	SW846 8260B
Bromodichloromethane	ND	5.0	ug/L	SW846 8260B
Bromoform	ND	5.0	ug/L	SW846 8260B
Bromomethane	ND	10	ug/L	SW846 8260B
2-Butanone	ND	20	ug/L	SW846 8260B
Carbon disulfide	ND	5.0	ug/L	SW846 8260B
Carbon tetrachloride	ND	5.0	ug/L	SW846 8260B
Chlorobenzene	ND	5.0	ug/L	SW846 8260B
Dibromochloromethane	ND	5.0	ug/L	SW846 8260B
Chloroethane	ND	10	ug/L	SW846 8260B
Chloroform	2.1 J	5.0	ug/L	SW846 8260B
Chloromethane	ND	10	ug/L	SW846 8260B
1,1-Dichloroethane	ND	5.0	ug/L	SW846 8260B
1,2-Dichloroethane	ND	5.0	ug/L	SW846 8260B
1,1-Dichloroethene	ND	5.0	ug/L	SW846 8260B
1,2-Dichloroethene	ND	5.0	ug/L	SW846 8260B
(total)				
1,2-Dichloropropane	ND	5.0	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	5.0	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	5.0	ug/L	SW846 8260B
Ethylbenzene	ND	5.0	ug/L	SW846 8260B
2-Hexanone	ND	20	ug/L	SW846 8260B
Methylene chloride	ND	5.0	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	20	ug/L	SW846 8260B
Styrene	ND	5.0	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	5.0	ug/L	SW846 8260B
Tetrachloroethene	ND	5.0	ug/L	SW846 8260B
Toluene	ND	5.0	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	5.0	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	5.0	ug/L	SW846 8260B
Trichloroethene	ND	5.0	ug/L	SW846 8260B
Vinyl chloride	ND	10	ug/L	SW846 8260B
Xylenes (total)	ND	5.0	ug/L	SW846 8260B

J Estimated result. Result is less than RL.

(Continued on next page)

SEVERN TRENT LABORATORIES NC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG200210 UXB International PAGE 4
 Dunn Field, Def Depot Memphis Date Reported: 7/27/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/201/WA/002

Sample #: 001 Date Sampled: 07/19/00 10:30 Date Received: 07/20/00 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

Pyridine	ND	20	ug/L	SW846 8270C
Acenaphthene	ND	10	ug/L	SW846 8270C
Acenaphthylene	ND	10	ug/L	SW846 8270C
Anthracene	ND	10	ug/L	SW846 8270C
Benzo(a)anthracene	ND	10	ug/L	SW846 8270C
Benzo(a)pyrene	ND	10	ug/L	SW846 8270C
Benzo(b)fluoranthene	ND	10	ug/L	SW846 8270C
Benzo(k)fluoranthene	ND	10	ug/L	SW846 8270C
Benzo(ghi)perylene	ND	10	ug/L	SW846 8270C
bis(2-Chloroethoxy) methane	ND	10	ug/L	SW846 8270C
bis(2-Chloroethyl)- ether	ND	10	ug/L	SW846 8270C
bis(2-Ethylhexyl) phthalate	11	10	ug/L	SW846 8270C
4-Bromophenyl phenyl ether	ND	10	ug/L	SW846 8270C
Butyl benzyl phthalate	5.6 J	10	ug/L	SW846 8270C
Carbazole	ND	10	ug/L	SW846 8270C
4-Chloroaniline	ND	10	ug/L	SW846 8270C
4-Chloro-3-methylphenol	ND	10	ug/L	SW846 8270C
2-Chloronaphthalene	ND	10	ug/L	SW846 8270C
2-Chlorophenol	ND	10	ug/L	SW846 8270C
4-Chlorophenyl phenyl ether	ND	10	ug/L	SW846 8270C
Chrysene	ND	10	ug/L	SW846 8270C
Dibenz(a,h)anthracene	ND	10	ug/L	SW846 8270C
Dibenzofuran	ND	10	ug/L	SW846 8270C
1,2-Dichlorobenzene	ND	10	ug/L	SW846 8270C
1,3-Dichlorobenzene	ND	10	ug/L	SW846 8270C
1,4-Dichlorobenzene	ND	10	ug/L	SW846 8270C
3,3'-Dichlorobenzidine	ND	50	ug/L	SW846 8270C
2,4-Dichlorophenol	ND	10	ug/L	SW846 8270C
Diethyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dimethylphenol	ND	10	ug/L	SW846 8270C
Dimethyl phthalate	ND	10	ug/L	SW846 8270C

(Continued on next page)

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG200210 UXB International PAGE 5
 Dunn Field, Def Depot Memphis Date Reported: 7/27/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/201/WA/002
 Sample #: 001 Date Sampled: 07/19/00 10:30 Date Received: 07/20/00 Matrix: WATER

Semivolatile Organic Compounds by GC/MS				Reviewed
Di-n-butyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-octyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dinitrophenol	ND	50	ug/L	SW846 8270C
1,6-Dinitro-2-methylphenol	ND	50	ug/L	SW846 8270C
2,4-Dinitrotoluene	ND	10	ug/L	SW846 8270C
2,6-Dinitrotoluene	ND	10	ug/L	SW846 8270C
Fluoranthene	ND	10	ug/L	SW846 8270C
Fluorene	ND	10	ug/L	SW846 8270C
Hexachlorobenzene	ND	10	ug/L	SW846 8270C
Hexachlorobutadiene	ND	10	ug/L	SW846 8270C
Hexachlorocyclopentadiene	ND	50	ug/L	SW846 8270C
Hexachloroethane	ND	10	ug/L	SW846 8270C
Indeno(1,2,3-cd)pyrene	ND	10	ug/L	SW846 8270C
Isophorone	ND	10	ug/L	SW846 8270C
2-Methylnaphthalene	ND	10	ug/L	SW846 8270C
2-Methylphenol	ND	10	ug/L	SW846 8270C
4-Methylphenol	ND	10	ug/L	SW846 8270C
Naphthalene	ND	10	ug/L	SW846 8270C
2-Nitroaniline	ND	50	ug/L	SW846 8270C
3-Nitroaniline	ND	50	ug/L	SW846 8270C
4-Nitroaniline	ND	50	ug/L	SW846 8270C
Nitrobenzene	ND	10	ug/L	SW846 8270C
2-Nitrophenol	ND	10	ug/L	SW846 8270C
4-Nitrophenol	ND	50	ug/L	SW846 8270C
N-Nitrosodi-n-propylamine	ND	10	ug/L	SW846 8270C
N-Nitrosodiphenylamine	ND	10	ug/L	SW846 8270C
2,2'-oxybis(1-Chloropropane)	ND	10	ug/L	SW846 8270C
Pentachlorophenol	ND	50	ug/L	SW846 8270C
Phenanthrene	ND	10	ug/L	SW846 8270C
Phenol	ND	10	ug/L	SW846 8270C
Pyrene	ND	10	ug/L	SW846 8270C
1,2,4-Trichlorobenzene	ND	10	ug/L	SW846 8270C
2,4,5-Trichlorophenol	ND	10	ug/L	SW846 8270C

(Continued on next page)

SEVERN TRENT LABORATORIES, 3.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG200210 UXB International PAGE 6
Dunn Field, Def Depot Memphis Date Reported: 7/27/00
Project Number: UXB 7512-060

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>	<u>ANALYTICAL METHOD</u>
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Client Sample ID: DF/S1/201/WA/002

Sample #: 001 Date Sampled: 07/19/00 10:30 Date Received: 07/20/00 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

2,4,6-Trichloro-phenol	ND	10	ug/L	SW846 8270C
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Reviewed

J Estimated result. Result is less than RL.

Inorganic Analysis

Cyanide, Total	ND	10.0	ug/L	SW846 9012A
Pensky-Martens Method for Determining Ignitability	>200		deg F	SW846 1010
pH Aqueous	8.1		No Units	SW846 9040
Sulfide	8.3	1.0	mg/L	MCAWW 376.1

Reviewed



TENNESSEE

DR WILLIE W HERENTON - Mayor
RICK MASSON - Chief Administrative Officer
DIVISION OF PUBLIC WORKS
JERRY R. COLLINS JR. - Director
Maynard C. Stiles Wastewater Treatment Plant

Thursday, August 31, 2000

Mr. Frank Johnson
Project Manager
UXO International Inc.
21641 Beaumeade Circle, Suite 301
Ashburn, Virginia 20147-6002

RE: Request for disposal of rinse water
Dunn Field, Defense Depot, Memphis, Tennessee

Dear Mr. Johnson:

We have received and approve your request to discharge 450 gallons of rinse water into sanitary sewer system at the above referenced site. This wastewater was generated from rinsing protective clothing during soil excavation and has been stored in a tank at the Depot. The discharge point is a manhole located at Kyle Street at the west property line of the Defense Depot.

This approval is for this batch of treated groundwater only.

If you should have any questions, please feel free to contact me at (901) 353-2392.

Sincerely,


Akil AL-Chokhachi
Environmental Engineer

cc: Rodney Thomas
Shawn Phillips - Memphis Depot Caretaker



UXB International, Inc. Demining - Ordnance and Explosive Waste Services

August 28, 2000

Mr. Akil Al-Chokahachi
City of Memphis Public Works
2303 North Second Street
Memphis, TN 38127-7500

Re: Discharge of water into the City of Memphis Sewer System;
Permit Request

Dear Mr. Chokahachi,

I am requesting authorization to discharge 440 gallons of water into the Memphis sewer system. The water is currently stored in eight 55-gallons drums at Dunn Field, Memphis Defense Depot.

The water that I am requesting to discharge into the Memphis sewer system was used to rinse protective clothing worn by personnel working in the vapor containment structure at Dunn Field.

UXB International, Inc., under contract with the Corps of Engineers, is currently conducting excavation at the Dunn Field area of the former Defense Depot, Memphis, Tennessee in pursuit of possible buried chemical warfare agents. To date, there has been no indication of these agents or other chemicals of concern. Soil analyses have not indicated the presence of chemical warfare agents, breakdown products.

Only tap water mixed with mild soap and 5 percent sodium hypochlorite (common household bleach) was used to decontaminate personnel protective clothing.

The water was contained only as a precautionary measure and tested by an independent laboratory (Severn-Trent) for the presence of HTW. A copy of the TCLP sample analysis is attached to this letter for your perusal. Moreover, the Edgewood Chemical and Biological Center tested water samples for the presence of chemical warfare agents. All tests are negative.

To the best of my knowledge and belief, the water does not contain any hazardous or toxic chemicals, nor is it classified as hazardous waste. Other than the mild soap and bleach, no chemicals have been introduced to the water.

I intend to discharge the water at the sewer inlet located near the corner of Kyle Street and Menager Street (adjacent to Dunn Field).

Please mail your response to:

Mr. Frank Johnson
1325 Landfair Dr. #103
Germantown, TN 38138

Or fax to (901) 745-4280.

Should you have any questions or concerns regarding this request, please contact me at (901) 745-4999 or my cellular phone (703) 625-3792.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Johnson', with a stylized flourish at the end.

Frank Johnson
Project Manager

SEVERN TRENT LABORATORIES INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG270302 UKB International PAGE 1
 Dunn Field, Def Depot Memphis Date Reported: 8/09/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Client Sample ID: DF/S1/0208/IDW/002				
Sample #: 001 Date Sampled: 07/26/00 10:00 Date Received: 07/27/00 Matrix: WATER				
Trace Inductively Coupled Plasma (ICP) Metals				
Silver	1.6 B	5	ug/L	SW846 6010B
Arsenic	4.2 B	10	ug/L	SW846 6010B
Cadmium	0.77 B	5	ug/L	SW846 6010B
Chromium	49.2	10	ug/L	SW846 6010B
Lead	ND	3	ug/L	SW846 6010B
Antimony	12.1 B	60	ug/L	SW846 6010B
Selenium	ND	5	ug/L	SW846 6010B
Thallium	7.9 B	10	ug/L	SW846 6010B

Reviewed

Inductively Coupled Plasma (ICP) Metals				
Aluminum	376	200	ug/L	SW846 6010B
Barium	120 B	200	ug/L	SW846 6010B
Beryllium	0.12 B	5	ug/L	SW846 6010B
Calcium	34500	5000	ug/L	SW846 6010B
Cobalt	ND	50	ug/L	SW846 6010B
Copper	18.9 B	25	ug/L	SW846 6010B
Iron	428	100	ug/L	SW846 6010B
Potassium	4150 B	5000	ug/L	SW846 6010B
Magnesium	9060	5000	ug/L	SW846 6010B
Manganese	43.4	15	ug/L	SW846 6010B
Sodium	1000000	25000	ug/L	SW846 6010B
Nickel	ND	40	ug/L	SW846 6010B
Vanadium	2.7 B	50	ug/L	SW846 6010B
Zinc	67.3	20	ug/L	SW846 6010B

Reviewed

Mercury in Liquid Waste (Manual Cold-Vapor)				
Mercury	0.40	0.2	ug/L	SW846 7470A

Reviewed

8 Estimated result Result is less than RL.

Organochlorine Pesticides				
alpha-BHC	ND	0.050	ug/L	SW846 8081A
beta-BHC	ND	0.050	ug/L	SW846 8081A
delta-BHC	0.019 J,P	0.050	ug/L	SW846 8081A
gamma-BHC (Lindane)	ND	0.050	ug/L	SW846 8081A
Heptachlor	ND	0.050	ug/L	SW846 8081A

Reviewed

(Continued on next page)

SEVERN TRENT LABORATORIES INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG270302 UXB International PAGE 2
 Dunn Field, Def Depot Memphis Date Reported: 8/09/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0208/IDW/002

Sample #: 001 Date Sampled: 07/26/00 10:00 Date Received: 07/27/00 Matrix: WATER

Organochlorine Pesticides

Reviewed

Aldrin	ND	0.050	ug/L	SW846 8081A
Heptachlor epoxide	0.094 P	0.050	ug/L	SW846 8081A
Endosulfan I	ND	0.050	ug/L	SW846 8081A
Dieldrin	ND	0.050	ug/L	SW846 8081A
4,4'-DDE	ND	0.050	ug/L	SW846 8081A
Endrin	ND	0.050	ug/L	SW846 8081A
Endrin ketone	ND	0.050	ug/L	SW846 8081A
Endrin aldehyde	ND	0.050	ug/L	SW846 8081A
Endosulfan II	ND	0.050	ug/L	SW846 8081A
4,4'-DDD	0.034 J,P	0.050	ug/L	SW846 8081A
Endosulfan sulfate	ND	0.050	ug/L	SW846 8081A
4,4'-DDT	ND	0.050	ug/L	SW846 8081A
Methoxychlor	ND	0.10	ug/L	SW846 8081A
alpha-Chlordane	0.014 J,P	0.050	ug/L	SW846 8081A
gamma-Chlordane	0.014 J,P	0.050	ug/L	SW846 8081A
Toxaphene	ND	2.0	ug/L	SW846 8081A

J Estimated result. Result is less than RL.

P The percent difference between the original and confirmation analyses is greater than 25%.

PCBs by SW-846 8082

Reviewed

Aroclor 1016	ND	1.0	ug/L	SW846 8082
Aroclor 1221	ND	1.0	ug/L	SW846 8082
Aroclor 1232	ND	1.0	ug/L	SW846 8082
Aroclor 1242	ND	1.0	ug/L	SW846 8082
Aroclor 1248	ND	1.0	ug/L	SW846 8082
Aroclor 1254	ND	1.0	ug/L	SW846 8082
Aroclor 1260	ND	1.0	ug/L	SW846 8082

Chlorinated Herbicides by GC

Reviewed

2,4-D	ND	400	ug/L	SW846 8151A
2,4,5-TP (Silvex)	ND	100	ug/L	SW846 8151A

SAMPLE DILUTED DUE TO MATRIX

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COGZ70302 UXB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 8/09/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0208/IDW/002

Sample #: 001 Date Sampled: 07/26/00 10:00 Date Received: 07/27/00 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

Acetone	32 B	20	ug/L	SW846 8260B
Benzene	ND	5.0	ug/L	SW846 8260B
Bromodichloromethane	19	5.0	ug/L	SW846 8260B
Bromoform	ND	5.0	ug/L	SW846 8260B
Bromomethane	6.4 J	10	ug/L	SW846 8260B
2-Butanone	17 J	20	ug/L	SW846 8260B
Carbon disulfide	ND	5.0	ug/L	SW846 8260B
Carbon tetrachloride	ND	5.0	ug/L	SW846 8260B
Chlorobenzene	ND	5.0	ug/L	SW846 8260B
Dibromochloromethane	ND	5.0	ug/L	SW846 8260B
Chloroethane	45	10	ug/L	SW846 8260B
Chloroform	5300 E	5.0	ug/L	SW846 8260B
Chloromethane	72	10	ug/L	SW846 8260B
1,1-Dichloroethane	2.9 J	5.0	ug/L	SW846 8260B
1,2-Dichloroethane	ND	5.0	ug/L	SW846 8260B
1,1-Dichloroethene	ND	5.0	ug/L	SW846 8260B
1,2-Dichloroethene	ND	5.0	ug/L	SW846 8260B
(total)				
1,2-Dichloropropane	ND	5.0	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	5.0	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	5.0	ug/L	SW846 8260B
Ethylbenzene	ND	5.0	ug/L	SW846 8260B
2-Hexanone	ND	20	ug/L	SW846 8260B
Methylene chloride	5.5	5.0	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	20	ug/L	SW846 8260B
Styrene	ND	5.0	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	5.0	ug/L	SW846 8260B
Tetrachloroethene	ND	5.0	ug/L	SW846 8260B
Toluene	ND	5.0	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	5.0	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	5.0	ug/L	SW846 8260B
Trichloroethene	ND	5.0	ug/L	SW846 8260B
Vinyl chloride	ND	10	ug/L	SW846 8260B
Xylenes (total)	ND	5.0	ug/L	SW846 8260B

Method blank contamination. The associated method blank contains the target analyte at a reportable level.

(Continued on next page)

SEVERN TRENT LABORATORIES NC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C0G270302 UXB International Date Reported: 8/09/00
 Dunn Field, Def Depot Memphis
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0208/IDW/002
 Sample #: 001 Date Sampled: 07/26/00 10:00 Date Received: 07/27/00 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

- J Estimated result. Result is less than RL.
 E Estimated result. Result concentration exceeds the calibration range.

Volatile Organics by GC/MS

Reviewed

Acetone	350 J,B	2000	ug/L	SW846 8260B
Benzene	ND	500	ug/L	SW846 8260B
Bromodichloromethane	ND	500	ug/L	SW846 8260B
Bromoform	ND	500	ug/L	SW846 8260B
Bromomethane	200 J	1000	ug/L	SW846 8260B
2-Butanone	ND	2000	ug/L	SW846 8260B
Carbon disulfide	ND	500	ug/L	SW846 8260B
Carbon tetrachloride	ND	500	ug/L	SW846 8260B
Chlorobenzene	ND	500	ug/L	SW846 8260B
Dibromochloromethane	ND	500	ug/L	SW846 8260B
Chloroethane	ND	1000	ug/L	SW846 8260B
Chloroform	10000	500	ug/L	SW846 8260B
Chloromethane	180 J	1000	ug/L	SW846 8260B
1,1-Dichloroethane	ND	500	ug/L	SW846 8260B
1,2-Dichloroethane	ND	500	ug/L	SW846 8260B
1,1-Dichloroethene	ND	500	ug/L	SW846 8260B
1,2-Dichloroethene	ND	500	ug/L	SW846 8260B
(total)				
1,2-Dichloropropane	ND	500	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	500	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	500	ug/L	SW846 8260B
Ethylbenzene	ND	500	ug/L	SW846 8260B
2-Hexanone	ND	2000	ug/L	SW846 8260B
Methylene chloride	ND	500	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	2000	ug/L	SW846 8260B
Styrene	ND	500	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	500	ug/L	SW846 8260B
Tetrachloroethene	ND	500	ug/L	SW846 8260B
Toluene	ND	500	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	500	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	500	ug/L	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIE INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG270302 UXB International PAGE 5
 Dunn Field, Def Depot Memphis Date Reported: 8/09/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0208/IDW/002

Sample #: 001 Date Sampled: 07/26/00 10:00 Date Received: 07/27/00 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

Trichloroethene	ND	500	ug/L	SW846 8260B
Vinyl chloride	ND	1000	ug/L	SW846 8260B
Xylenes (total)	ND	500	ug/L	SW846 8260B

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

Semivolatile Organic Compounds by GC/MS

Reviewed

Pyridine	ND	40	ug/L	SW846 8270C
Acenaphthene	ND	20	ug/L	SW846 8270C
Acenaphthylene	ND	20	ug/L	SW846 8270C
Anthracene	ND	20	ug/L	SW846 8270C
Benzo(a)anthracene	ND	20	ug/L	SW846 8270C
Benzo(a)pyrene	ND	20	ug/L	SW846 8270C
Benzo(b)fluoranthene	ND	20	ug/L	SW846 8270C
Benzo(k)fluoranthene	ND	20	ug/L	SW846 8270C
Benzo(ghi)perylene	ND	20	ug/L	SW846 8270C
bis(2-Chloroethoxy) methane	ND	20	ug/L	SW846 8270C
bis(2-Chloroethyl)- ether	ND	20	ug/L	SW846 8270C
bis(2-Ethylhexyl) phthalate	29	20	ug/L	SW846 8270C
4-Bromophenyl phenyl ether	ND	20	ug/L	SW846 8270C
Butyl benzyl phthalate	ND	20	ug/L	SW846 8270C
Carbazole	ND	20	ug/L	SW846 8270C
4-Chloroaniline	ND	20	ug/L	SW846 8270C
4-Chloro-3-methylphenol	ND	20	ug/L	SW846 8270C
2-Chloronaphthalene	ND	20	ug/L	SW846 8270C
2-Chlorophenol	ND	20	ug/L	SW846 8270C
4-Chlorophenyl phenyl ether	ND	20	ug/L	SW846 8270C
Chrysene	ND	20	ug/L	SW846 8270C
Dibenz(a,h)anthracene	ND	20	ug/L	SW846 8270C
Dibenzofuran	ND	20	ug/L	SW846 8270C

(Continued on next page)

SEVERN TRENT LABORATORIES INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG270302 UXB International PAGE 6
 Dunn Field, Def Depot Memphis Date Reported: 8/09/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0208/IDW/002

Sample #: 001 Date Sampled: 07/26/00 10:00 Date Received: 07/27/00 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

1,2-Dichlorobenzene	ND	20	ug/L	SW846 8270C
1,3-Dichlorobenzene	ND	20	ug/L	SW846 8270C
1,4-Dichlorobenzene	ND	20	ug/L	SW846 8270C
3,3'-Dichlorobenzidine	ND	100	ug/L	SW846 8270C
2,4-Dichlorophenol	ND	20	ug/L	SW846 8270C
Diethyl phthalate	ND	20	ug/L	SW846 8270C
2,4-Dimethylphenol	ND	20	ug/L	SW846 8270C
Dimethyl phthalate	ND	20	ug/L	SW846 8270C
Di-n-butyl phthalate	ND	20	ug/L	SW846 8270C
Di-n-octyl phthalate	ND	20	ug/L	SW846 8270C
2,4-Dinitrophenol	ND	100	ug/L	SW846 8270C
4,6-Dinitro-2-methylphenol	ND	100	ug/L	SW846 8270C
2,4-Dinitrotoluene	ND	20	ug/L	SW846 8270C
2,6-Dinitrotoluene	ND	20	ug/L	SW846 8270C
Fluoranthene	ND	20	ug/L	SW846 8270C
Fluorene	ND	20	ug/L	SW846 8270C
Hexachlorobenzene	ND	20	ug/L	SW846 8270C
Hexachlorobutadiene	ND	20	ug/L	SW846 8270C
Hexachlorocyclopentadiene	ND	100	ug/L	SW846 8270C
Hexachloroethane	ND	20	ug/L	SW846 8270C
Indeno(1,2,3-cd)pyrene	ND	20	ug/L	SW846 8270C
Isophorone	ND	20	ug/L	SW846 8270C
2-Methylnaphthalene	ND	20	ug/L	SW846 8270C
2-Methylphenol	ND	20	ug/L	SW846 8270C
4-Methylphenol	ND	20	ug/L	SW846 8270C
Naphthalene	ND	20	ug/L	SW846 8270C
2-Nitroaniline	ND	100	ug/L	SW846 8270C
3-Nitroaniline	ND	100	ug/L	SW846 8270C
4-Nitroaniline	ND	100	ug/L	SW846 8270C
Nitrobenzene	ND	20	ug/L	SW846 8270C
2-Nitrophenol	ND	20	ug/L	SW846 8270C
4-Nitrophenol	ND	100	ug/L	SW846 8270C
N-Nitrosodi-n-propylamine	ND	20	ug/L	SW846 8270C
N-Nitrosodiphenylamine	ND	20	ug/L	SW846 8270C

(Continued on next page)

SEVERN TRENT LABORATORIES INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COG270302 UXB International PAGE 7
 Dunn Field, Def Depot Memphis Date Reported: 8/09/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0208/IDW/002

Sample #: 001 Date Sampled: 07/26/00 10:00 Date Received: 07/27/00 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

2,2'-oxybis(1-Chloropropane)	ND	20	ug/L	SW846 8270C
Pentachlorophenol	ND	100	ug/L	SW846 8270C
Phenanthrene	ND	20	ug/L	SW846 8270C
Phenol	ND	20	ug/L	SW846 8270C
Pyrene	ND	20	ug/L	SW846 8270C
1,2,4-Trichloro- benzene	ND	20	ug/L	SW846 8270C
2,4,5-Trichloro- phenol	ND	20	ug/L	SW846 8270C
2,4,6-Trichloro- phenol	ND	20	ug/L	SW846 8270C

Inorganic Analysis

Reviewed

Cyanide, Total	ND	10.0	ug/L	SW846 9012A
Pensky-Martens Method for Determining Ignitability	>200		deg F	SW846 1010
pH Aqueous	7.0		No Units	SW846 9040
Sulfide	ND	1.0	mg/L	MCAWW 376.1

UXB International Inc.

Dunn Field, Memphis, TN

Fax

To: Harley Heaton From: Jim Dunkle
Fax: _____ Pages: 9
Phone: X-646 Date: 20 Feb 01
Re: Water Sampl TCLP CC: _____
☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

The Enclosed TCLP Is For Water Sample
DF/S-1/1039/IDW/004

Feb 20 01 07:01a

UXB International

(901) 745-4280

654

282

p.2



Date: 02/16/01
Time: 13:44:25
(Mountain Time)

From: Jill Colussy
STL Pittsburgh
450 William Pitt Way
Pittsburgh, PA 15238

To: Frank Johnson
UXB International
901-7454280

voice: 412- 820-2095
fax: 412- 820-2080

Number of Pages
Including Cover Sheet: 08

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Quote Number: 034878
Project Number: UXB 7512-060
Project Name/Site: Dunn Field, Def Depot Memphis

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C1B090228 UXB International PAGE 1
 Dunn Field, Def Depot Memphis Date Reported: 2/16/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S-1/1039/IDW/004

Sample #: 001 Date Sampled: 02/08/01 10:40 Date Received: 02/09/01 Matrix: WATER

Trace Inductively Coupled Plasma (ICP) Metals

Reviewed

Silver	ND	10.0	ug/L	SW846 6010B
Arsenic	8.0 B	10.0	ug/L	SW846 6010B
Cadmium	0.56 B	5.0	ug/L	SW846 6010B
Chromium	23.5	10.0	ug/L	SW846 6010B
Lead	13.3	3.0	ug/L	SW846 6010B
Antimony	30.0 B	60.0	ug/L	SW846 6010B
Selenium	ND	5.0	ug/L	SW846 6010B
Thallium	ND	10.0	ug/L	SW846 6010B

Inductively Coupled Plasma (ICP) Metals

Reviewed

Aluminum	1580 N	200	ug/L	SW846 6010B
Barium	218	200	ug/L	SW846 6010B
Beryllium	ND	5.0	ug/L	SW846 6010B
Calcium	71900	5000	ug/L	SW846 6010B
Cobalt	ND	50.0	ug/L	SW846 6010B
Copper	51.8	25.0	ug/L	SW846 6010B
Iron	2970	100	ug/L	SW846 6010B
Potassium	4600 B	5000	ug/L	SW846 6010B
Magnesium	16700	5000	ug/L	SW846 6010B
Manganese	898	15.0	ug/L	SW846 6010B
Sodium	489000	10000	ug/L	SW846 6010B
Nickel	20.0 B	40.0	ug/L	SW846 6010B
Vanadium	3.9 B	50.0	ug/L	SW846 6010B
Zinc	203	20.0	ug/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor)

Reviewed

Mercury	0.16 B	0.20	ug/L	SW846 7470A
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B Estimated result. Result is less than RL.

M Spiked analyte recovery is outside stated control limits.

Organochlorine Pesticides

Reviewed

alpha-BHC	ND	0.050	ug/L	SW846 8081A
beta-BHC	ND	0.050	ug/L	SW846 8081A
delta-BHC	0.015 J,P	0.050	ug/L	SW846 8081A
gamma-BHC (Lindane)	0.014 J,P	0.050	ug/L	SW846 8081A

(Continued on next page)

SEVERN TRENT LABORATORIES, INC

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Loc #: C1B090228 UXB International PAGE 2
Dunn Field, Def Depot Memphis Date Reported: 2/16/01
Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S-1/1039/IDW/004
Sample #: 001 Date Sampled: 02/08/01 10:40 Date Received: 02/09/01 Matrix: WATER

Organochlorine Pesticides

Reviewed

Heptachlor	ND	0.050	ug/L	SW846 8081A
Aldrin	ND	0.050	ug/L	SW846 8081A
Heptachlor epoxide	ND	0.050	ug/L	SW846 8081A
Endosulfan I	ND	0.050	ug/L	SW846 8081A
Dieldrin	0.014 J,P	0.050	ug/L	SW846 8081A
4,4'-DDE	0.0051 J,P	0.050	ug/L	SW846 8081A
Endrin	0.053 P	0.050	ug/L	SW846 8081A
Endrin ketone	ND	0.050	ug/L	SW846 8081A
Endrin aldehyde	ND	0.050	ug/L	SW846 8081A
Endosulfan II	ND	0.050	ug/L	SW846 8081A
4,4'-DDD	0.017 J,P	0.050	ug/L	SW846 8081A
Endosulfan sulfate	ND	0.050	ug/L	SW846 8081A
4,4'-DDT	ND	0.050	ug/L	SW846 8081A
Methoxychlor	ND	0.10	ug/L	SW846 8081A
alpha-Chlordane	ND	0.050	ug/L	SW846 8081A
gamma-Chlordane	0.079 P	0.050	ug/L	SW846 8081A
Toxaphene	ND	2.0	ug/L	SW846 8081A

J Estimated result. Result is less than RL.

P The percent difference between the original and confirmation analysis is greater than 25%.

PCBs by SW-846 8082

Reviewed

Aroclor 1016	ND	1.0	ug/L	SW846 8082
Aroclor 1221	ND	1.0	ug/L	SW846 8082
Aroclor 1232	ND	1.0	ug/L	SW846 8082
Aroclor 1242	ND	1.0	ug/L	SW846 8082
Aroclor 1248	ND	1.0	ug/L	SW846 8082
Aroclor 1254	ND	1.0	ug/L	SW846 8082
Aroclor 1260	ND	1.0	ug/L	SW846 8082

Chlorinated Herbicides by GC

Reviewed

2,4-D	2.7 J	20	ug/L	SW846 8151A
2,4,5-TP (Silvex)	1.4 J	5.0	ug/L	SW846 8151A

J Estimated result. Result is less than RL.

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C18090228 UXB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 2/16/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S-1/1039/IDW/004

Sample #: 001 Date Sampled: 02/08/01 10:40 Date Received: 02/09/01 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

Acetone	24	20	ug/L	SW846 8260B
Benzene	ND	5.0	ug/L	SW846 8260B
Bromodichloromethane	33	5.0	ug/L	SW846 8260B
Bromoform	ND	5.0	ug/L	SW846 8260B
Bromomethane	ND	10	ug/L	SW846 8260B
2-Butanone	32	20	ug/L	SW846 8260B
Carbon disulfide	1.7 J	5.0	ug/L	SW846 8260B
Carbon tetrachloride	ND	5.0	ug/L	SW846 8260B
Chlorobenzene	ND	5.0	ug/L	SW846 8260B
Dibromochloromethane	ND	5.0	ug/L	SW846 8260B
Chloroethane	3.6 J	10	ug/L	SW846 8260B
Chloroform	3000 E	5.0	ug/L	SW846 8260B
Chloromethane	1.6 J	10	ug/L	SW846 8260B
1,1-Dichloroethane	ND	5.0	ug/L	SW846 8260B
1,2-Dichloroethane	ND	5.0	ug/L	SW846 8260B
1,1-Dichloroethene	ND	5.0	ug/L	SW846 8260B
1,2-Dichloroethene	ND	5.0	ug/L	SW846 8260B
(total)				
1,2-Dichloropropane	ND	5.0	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	5.0	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	5.0	ug/L	SW846 8260B
Ethylbenzene	ND	5.0	ug/L	SW846 8260B
2-Hexanone	ND	20	ug/L	SW846 8260B
Methylene chloride	2.9 J	5.0	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	20	ug/L	SW846 8260B
Styrene	ND	5.0	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	5.0	ug/L	SW846 8260B
Tetrachloroethene	ND	5.0	ug/L	SW846 8260B
Toluene	ND	5.0	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	5.0	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	5.0	ug/L	SW846 8260B
Trichloroethene	ND	5.0	ug/L	SW846 8260B
Vinyl chloride	ND	10	ug/L	SW846 8260B
Xylenes (total)	ND	5.0	ug/L	SW846 8260B

J Estimated result. Result is less than RL.

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C18090228 UXB International PAGE 4
Dunn Field, Def Depot Memphis Date Reported: 2/16/01
Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S-1/1039/IDW/004

Sample #: 001 Date Sampled: 02/08/01 10:40 Date Received: 02/09/01 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

C Estimated result. Result concentration exceeds the calibration range

Volatile Organics by GC/MS

Reviewed

Acetone	79 J	1000	ug/L	SW846 8260B
Benzene	ND	250	ug/L	SW846 8260B
Bromodichloromethane	ND	250	ug/L	SW846 8260B
Bromoform	ND	250	ug/L	SW846 8260B
Bromomethane	ND	500	ug/L	SW846 8260B
2-Butanone	ND	1000	ug/L	SW846 8260B
Carbon disulfide	ND	250	ug/L	SW846 8260B
Carbon tetrachloride	ND	250	ug/L	SW846 8260B
Chlorobenzene	ND	250	ug/L	SW846 8260B
Dibromochloromethane	ND	250	ug/L	SW846 8260B
Chloroethane	ND	500	ug/L	SW846 8260B
Chloroform	8800	250	ug/L	SW846 8260B
Chloromethane	ND	500	ug/L	SW846 8260B
1,1-Dichloroethane	ND	250	ug/L	SW846 8260B
1,2-Dichloroethane	ND	250	ug/L	SW846 8260B
1,1-Dichloroethene	ND	250	ug/L	SW846 8260B
1,2-Dichloroethene (total)	ND	250	ug/L	SW846 8260B
1,2-Dichloropropane	ND	250	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	250	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	250	ug/L	SW846 8260B
Ethylbenzene	ND	250	ug/L	SW846 8260B
2-Hexanone	ND	1000	ug/L	SW846 8260B
Methylene chloride	ND	250	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	1000	ug/L	SW846 8260B
Styrene	ND	250	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	250	ug/L	SW846 8260B
Tetrachloroethene	ND	250	ug/L	SW846 8260B
Toluene	ND	250	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	250	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	250	ug/L	SW846 8260B
Trichloroethene	ND	250	ug/L	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C1B090228 UXB International PAGE 5
 Dunn Field, Def Depot Memphis Date Reported: 2/16/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S-1/1039/IDW/004

Sample #: 001 Date Sampled: 02/08/01 10:40 Date Received: 02/09/01 Matrix: WATER

Volatile Organics by GC/MS

Vinyl chloride	ND	500	ug/L	SW846 B260B	Reviewed
Xylenes (total)	ND	250	ug/L	SW846 B260B	

J Estimated result. Result is less than RL.

Semivolatile Organic Compounds by GC/MS

Pyridine	ND	20	ug/L	SW846 B270C	Reviewed
Acenaphthene	ND	10	ug/L	SW846 B270C	
Acenaphthylene	ND	10	ug/L	SW846 B270C	
Anthracene	ND	10	ug/L	SW846 B270C	
Benzo(a)anthracene	ND	10	ug/L	SW846 B270C	
Benzo(a)pyrene	ND	10	ug/L	SW846 B270C	
Benzo(b)fluoranthene	ND	10	ug/L	SW846 B270C	
Benzo(k)fluoranthene	ND	10	ug/L	SW846 B270C	
Benzo(ghi)perylene	ND	10	ug/L	SW846 B270C	
bis(2-Chloroethoxy) methane	ND	10	ug/L	SW846 B270C	
bis(2-Chloroethyl)- ether	6.9 J	10	ug/L	SW846 B270C	
bis(2-Ethylhexyl) phthalate	23	10	ug/L	SW846 B270C	
4-Bromophenyl phenyl ether	ND	10	ug/L	SW846 B270C	
Butyl benzyl phthalate	ND	10	ug/L	SW846 B270C	
Carbazole	ND	10	ug/L	SW846 B270C	
4-Chloroaniline	ND	10	ug/L	SW846 B270C	
4-Chloro-3-methylphenol	ND	10	ug/L	SW846 B270C	
2-Chloronaphthalene	ND	10	ug/L	SW846 B270C	
2-Chlorophenol	ND	10	ug/L	SW846 B270C	
4-Chlorophenyl phenyl ether	ND	10	ug/L	SW846 B270C	
Chrysene	ND	10	ug/L	SW846 B270C	
Dibenz(a,h)anthracene	ND	10	ug/L	SW846 B270C	
Dibenzofuran	ND	10	ug/L	SW846 B270C	
1,2-Dichlorobenzene	ND	10	ug/L	SW846 B270C	
1,3-Dichlorobenzene	ND	10	ug/L	SW846 B270C	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C18090228 UXB International PAGE 6
 Dunn Field, Def Depot Memphis Date Reported: 2/16/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S-1/1039/IPW/004

Sample #: 001 Date Sampled: 02/08/01 10:40 Date Received: 02/09/01 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

1,4-Dichlorobenzene	ND	10	ug/L	SW846 8270C
3,3'-Dichlorobenzidine	ND	50	ug/L	SW846 8270C
2,4-Dichlorophenol	ND	10	ug/L	SW846 8270C
Diethyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dimethylphenol	ND	10	ug/L	SW846 8270C
Dimethyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-butyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-octyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dinitrophenol	ND	50	ug/L	SW846 8270C
4,6-Dinitro-2-methylphenol	ND	50	ug/L	SW846 8270C
2,4-Dinitrotoluene	ND	10	ug/L	SW846 8270C
2,6-Dinitrotoluene	ND	10	ug/L	SW846 8270C
Fluoranthene	ND	10	ug/L	SW846 8270C
Fluorene	ND	10	ug/L	SW846 8270C
Hexachlorobenzene	ND	10	ug/L	SW846 8270C
Hexachlorobutadiene	ND	10	ug/L	SW846 8270C
Hexachlorocyclopentadiene	ND	50	ug/L	SW846 8270C
Hexachloroethane	ND	10	ug/L	SW846 8270C
Indeno(1,2,3-cd)pyrene	ND	10	ug/L	SW846 8270C
Isophorone	ND	10	ug/L	SW846 8270C
2-Methylnaphthalene	ND	10	ug/L	SW846 8270C
2-Methylphenol	ND	10	ug/L	SW846 8270C
4-Methylphenol	ND	10	ug/L	SW846 8270C
Naphthalene	ND	10	ug/L	SW846 8270C
2-Nitroaniline	ND	50	ug/L	SW846 8270C
3-Nitroaniline	ND	50	ug/L	SW846 8270C
4-Nitroaniline	ND	50	ug/L	SW846 8270C
Nitrobenzene	ND	10	ug/L	SW846 8270C
2-Nitrophenol	ND	10	ug/L	SW846 8270C
4-Nitrophenol	ND	50	ug/L	SW846 8270C
N-Nitrosodi-n-propylamine	ND	10	ug/L	SW846 8270C
N-Nitrosodiphenylamine	ND	10	ug/L	SW846 8270C
2,2'-oxybis(1-Chloropropane)	ND	10	ug/L	SW846 8270C
Pentachlorophenol	ND	50	ug/L	SW846 8270C

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C18090228 UXB International PAGE 7
 Dunn Field, Def Depot Memphis Date Reported: 2/16/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S-1/1039/IDW/004

Sample #: 001 Date Sampled: 02/08/01 10:40 Date Received: 02/09/01 Matrix: WATER

Semivolatile Organic Compounds by GC/MS					Reviewed
Phenanthrene	ND	10	ug/L	SW846 8270C	
Phenol	3.9 J	10	ug/L	SW846 8270C	
Pyrene	ND	10	ug/L	SW846 8270C	
1,2,4-Trichloro- benzene	ND	10	ug/L	SW846 8270C	
2,4,5-Trichloro- phenol	ND	10	ug/L	SW846 8270C	
2,4,6-Trichloro- phenol	ND	10	ug/L	SW846 8270C	

J Estimated result. Result is less than RL.

Inorganic Analysis					Reviewed
Cyanide, Total	ND	10.0	ug/L	SW846 9012A	
Pensky-Martens Method for Determining Ignitability	>201		deg F	SW846 1010	
pH Aqueous	6.8		No Units	SW846 9040	
Sulfide	5.0	1.0	mg/L	MCAWW 376.1	



TENNESSEE

DR. WILLIE W. HERENTON - Mayor
RICK MASSON - Chief Administrative Officer
DIVISION OF PUBLIC WORKS
JERRY R. COLLINS JR. - Director
Maynard C. Stiles Wastewater Treatment Plant

Tuesday, March 27, 2001

Mr. Frank Johnson
Project Manager
UXB International Inc.
21641 Beaumeade Circle, Suite 301
Ashburn, Virginia 20147-6002

RE: Request for disposal of rinse water
Dunn Field, Defense Depot, Memphis, Tennessee

Dear Mr. Johnson:

We have received and approve your request to discharge 1,320 gallons of rinse water into sanitary sewer system at the above referenced site. This wastewater was generated from rinsing protective clothing during soil excavation and has been stored in a tank at the Depot. The discharge point is a manhole located at Kyle Street at the west property line of the Defense Depot.

This approval is for this batch of treated groundwater only.

If you should have any questions, please feel free to contact me at (901) 353-2392.

Sincerely,

Akil AL-Chokhachi
Environmental Engineer

cc: Rodney Thomas

Mr. Frank Johnson
1325 Landfair Dr. # 103
Germantown, TN 38138



UXB International, Inc. Demining - Ordnance and Explosive Waste Services

March 22, 2001

Mr. Akil Al-Chokahachi
City of Memphis Public Works
2303 North Second Street
Memphis, TN 38127-7500

Re: Discharge of water into the City of Memphis Sewer System;
Authorization Request

Dear Mr. Chokahachi,

I am requesting authorization to discharge 1,320 gallons of water into the Memphis sewer system. The water is currently stored in 55-gallons drums at Dunn Field, Memphis Defense Depot.

This water was used to rinse protective clothing worn by personnel working in the vapor containment structure at Dunn Field.

UXB International, Inc., under contract with the Corps of Engineers, Huntsville Center, is currently investigating selected areas at the Dunn Field area of the former Defense Depot, Memphis, Tennessee. We are investigating sites where chemical warfare agents were decontaminated in 1946. Some mustard-contaminated soil has been recovered as well as 29 decontaminated bomb casings.

The waste we request to discharge into the Memphis Sewer System has been tested by the Edgewood Chemical Biological Center's on-site mobile environmental analytical laboratory and is certified to be free of chemical warfare agents and degradation by-products.

Only tap water mixed with mild soap and 5 percent solution of sodium hypochlorite (common household bleach) is used to rinse personnel wearing personal protective clothing (PPE).

The water was collected only as a precautionary measure and tested by an independent laboratory (Severn-Trent) for the presence of HTRW. Copies of the Toxic Characteristic Leaching Procedure (TCLP) analysis are attached to this letter for your review.

I requested Mr. Harley Heaton, UXB Chemist, to review the TCLPs for EPA compliance. He did not detect a constituent in the report that would prevent its discharge into a sewer system. He may be contacted at (703) 724-9646.

To the best of my knowledge and belief, the water does not contain any hazardous or toxic chemicals, nor is it classified as hazardous waste. Other than the mild soap and bleach.

I request to discharge this water at a public sewer discharge location at or near a sewer facility. The Defense Logistics Agency Managers and myself are concerned with a negative public perception of discharging water in a Memphis community.

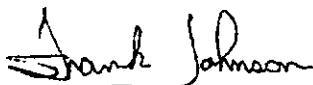
Please mail your response to:

Mr. Frank Johnson
1325 Landfair Dr. #103
Germantown, TN 38138

Should you have any questions or concerns regarding this request, please contact me at my cell phone (703) 625-3792; home (901) 624-4681 or email fjohnson@accessllc.net

Sincerely,

UXB International, Inc.



Frank Johnson
Project Manager

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C1B220250 UXB International PAGE 1
 Dunn Field, Def Depot Memphis Date Reported: 3/01/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/24-A/1052/IDW/001

Sample #: 001 Date Sampled: 02/21/01 08:40 Date Received: 02/22/01 Matrix: WATER

Trace Inductively Coupled Plasma (ICP) Metals

Reviewed

Silver	0.94 B	10.0	ug/L	SW846 6010B
Arsenic	10.3	10.0	ug/L	SW846 6010B
Cadmium	1.8 B	5.0	ug/L	SW846 6010B
Chromium	20.0	10.0	ug/L	SW846 6010B
Lead	66.1	3.0	ug/L	SW846 6010B
Antimony	17.1 B	60.0	ug/L	SW846 6010B
Selenium	5.0	5.0	ug/L	SW846 6010B
Thallium	5.3 B	10.0	ug/L	SW846 6010B

Inductively Coupled Plasma (ICP) Metals

Reviewed

Aluminum	422	200	ug/L	SW846 6010B
Barium	164 B	200	ug/L	SW846 6010B
Beryllium	0.13 B	5.0	ug/L	SW846 6010B
Calcium	56300	5000	ug/L	SW846 6010B
Cobalt	3.5 B	50.0	ug/L	SW846 6010B
Copper	95.9	25.0	ug/L	SW846 6010B
Iron	2020	100	ug/L	SW846 6010B
Potassium	5380	5000	ug/L	SW846 6010B
Magnesium	11900	5000	ug/L	SW846 6010B
Manganese	690	15.0	ug/L	SW846 6010B
Sodium	294000	5000	ug/L	SW846 6010B
Nickel	18.3 B	40.0	ug/L	SW846 6010B
Vanadium	ND	50.0	ug/L	SW846 6010B
Zinc	548	20.0	ug/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor)

Reviewed

Mercury	ND	0.20	ug/L	SW846 7470A
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1 Estimated result. Result is less than RL.

Organochlorine Pesticides

Reviewed

alpha-BHC	ND	0.050	ug/L	SW846 8081A
beta-BHC	ND	0.050	ug/L	SW846 8081A
delta-BHC	ND	0.050	ug/L	SW846 8081A
gamma-BHC (Lindane)	ND	0.050	ug/L	SW846 8081A
Heptachlor	0.011 J,P	0.050	ug/L	SW846 8081A

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C1B220250 UXB International PAGE 2
 Dunn Field, Def Depot Memphis Date Reported: 3/01/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/24-A/1052/IDW/001

Sample #: 001 Date Sampled: 02/21/01 08:40 Date Received: 02/22/01 Matrix: WATER

Organochlorine Pesticides

Reviewed

Aldrin	ND	0.050	ug/L	SW846 8081A
Heptachlor epoxide	ND	0.050	ug/L	SW846 8081A
Endosulfan I	ND	0.050	ug/L	SW846 8081A
Dieldrin	0.022 J,P	0.050	ug/L	SW846 8081A
4,4'-DDE	ND	0.050	ug/L	SW846 8081A
Endrin	ND	0.050	ug/L	SW846 8081A
Endrin ketone	ND	0.050	ug/L	SW846 8081A
Endrin aldehyde	ND	0.050	ug/L	SW846 8081A
Endosulfan II	ND	0.050	ug/L	SW846 8081A
4,4'-DDD	ND	0.050	ug/L	SW846 8081A
Endosulfan sulfate	ND	0.050	ug/L	SW846 8081A
4,4'-DDT	ND	0.050	ug/L	SW846 8081A
Methoxychlor	0.044 J	0.10	ug/L	SW846 8081A
alpha-Chlordane	ND	0.050	ug/L	SW846 8081A
gamma-Chlordane	ND	0.050	ug/L	SW846 8081A
Toxaphene	ND	2.0	ug/L	SW846 8081A

J Estimated result. Result is less than RL.

P The percent difference between the original and confirmation analyses is greater than 25%.

PCBs by SW-846 8082

Reviewed

Aroclor 1016	ND	1.0	ug/L	SW846 8082
Aroclor 1221	ND	1.0	ug/L	SW846 8082
Aroclor 1232	ND	1.0	ug/L	SW846 8082
Aroclor 1242	ND	1.0	ug/L	SW846 8082
Aroclor 1248	ND	1.0	ug/L	SW846 8082
Aroclor 1254	ND	1.0	ug/L	SW846 8082
Aroclor 1260	ND	1.0	ug/L	SW846 8082

Chlorinated Herbicides by GC

Reviewed

2,4-D	2.4 J	4.0	ug/L	SW846 8151A
2,4,5-TP (Silvex)	0.30 J	1.0	ug/L	SW846 8151A

J Estimated result. Result is less than RL.

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C1B220250 UXB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 3/01/01
 Project Number: UXB 7512-050

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/24-A/1052/IDW/001

Sample #: 001 Date Sampled: 02/21/01 08:40 Date Received: 02/22/01 Matrix: WATER

Volatile Organics by GC/MS					Reviewed
Acetone	35 J	200	ug/L	SW846 8260B	
Benzene	ND	50	ug/L	SW846 8260B	
Bromodichloromethane	ND	50	ug/L	SW846 8260B	
Bromoform	ND	50	ug/L	SW846 8260B	
Bromomethane	ND	100	ug/L	SW846 8260B	
2-Butanone	ND	200	ug/L	SW846 8260B	
Carbon disulfide	ND	50	ug/L	SW846 8260B	
Carbon tetrachloride	ND	50	ug/L	SW846 8260B	
Chlorobenzene	ND	50	ug/L	SW846 8260B	
Dibromochloromethane	ND	50	ug/L	SW846 8260B	
Chloroethane	ND	100	ug/L	SW846 8260B	
Chloroform	1600	50	ug/L	SW846 8260B	
Chloromethane	ND	100	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	50	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	50	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	50	ug/L	SW846 8260B	
1,2-Dichloroethene	ND	50	ug/L	SW846 8260B	
(total)					
1,2-Dichloropropane	ND	50	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	50	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	50	ug/L	SW846 8260B	
Ethylbenzene	ND	50	ug/L	SW846 8260B	
2-Hexanone	ND	200	ug/L	SW846 8260B	
Methylene chloride	ND	50	ug/L	SW846 8260B	
4-Methyl-2-pentanone	40 J	200	ug/L	SW846 8260B	
Styrene	ND	50	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	50	ug/L	SW846 8260B	
Tetrachloroethene	ND	50	ug/L	SW846 8260B	
Toluene	ND	50	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	50	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	50	ug/L	SW846 8260B	
Trichloroethene	ND	50	ug/L	SW846 8260B	
Vinyl chloride	ND	100	ug/L	SW846 8260B	
Xylenes (total)	ND	50	ug/L	SW846 8260B	

J Estimated result. Result is less than RL.

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH150146 UXB International, Inc. PAGE 8
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Client Sample ID: DF/S1/0227/IDW/003				
Sample #: 001 Date Sampled: 08/14/00 09:00 Date Received: 08/15/00 Matrix: WATER				
Semivolatile Organic Compounds by GC/MS				Reviewed
Chrysene	ND	10	ug/L	SW846 8270C
Dibenz(a,h)anthracene	ND	10	ug/L	SW846 8270C
Dibenzofuran	ND	10	ug/L	SW846 8270C
1,2-Dichlorobenzene	ND	10	ug/L	SW846 8270C
1,3-Dichlorobenzene	ND	10	ug/L	SW846 8270C
1,4-Dichlorobenzene	ND	10	ug/L	SW846 8270C
3,3'-Dichlorobenzidine	ND	50	ug/L	SW846 8270C
2,4-Dichlorophenol	ND	10	ug/L	SW846 8270C
Diethyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dimethylphenol	ND	10	ug/L	SW846 8270C
Dimethyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-butyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-octyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dinitrophenol	ND	50	ug/L	SW846 8270C
4,6-Dinitro-2-methylphenol	ND	50	ug/L	SW846 8270C
2,4-Dinitrotoluene	ND	10	ug/L	SW846 8270C
2,6-Dinitrotoluene	ND	10	ug/L	SW846 8270C
Fluoranthene	ND	10	ug/L	SW846 8270C
Fluorene	ND	10	ug/L	SW846 8270C
Hexachlorobenzene	ND	10	ug/L	SW846 8270C
Hexachlorobutadiene	ND	10	ug/L	SW846 8270C
Hexachlorocyclopentadiene	ND	50	ug/L	SW846 8270C
Hexachloroethane	ND	10	ug/L	SW846 8270C
Indeno(1,2,3-cd)pyrene	ND	10	ug/L	SW846 8270C
Isophorone	ND	10	ug/L	SW846 8270C
2-Methylnaphthalene	ND	10	ug/L	SW846 8270C
2-Methylphenol	ND	10	ug/L	SW846 8270C
4-Methylphenol	ND	10	ug/L	SW846 8270C
Naphthalene	ND	10	ug/L	SW846 8270C
2-Nitroaniline	ND	50	ug/L	SW846 8270C
3-Nitroaniline	ND	50	ug/L	SW846 8270C
4-Nitroaniline	ND	50	ug/L	SW846 8270C
Nitrobenzene	ND	10	ug/L	SW846 8270C
2-Nitrophenol	ND	10	ug/L	SW846 8270C
4-Nitrophenol	ND	50	ug/L	SW846 8270C

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH150146 UXB International PAGE 6
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0227/IDW/003

Sample #: 001 Date Sampled: 08/14/00 09:00 Date Received: 08/15/00 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

1,4-Dichlorobenzene	ND	10	ug/L	SW846 8270C
3,3'-Dichlorobenzidine	ND	50	ug/L	SW846 8270C
2,4-Dichlorophenol	ND	10	ug/L	SW846 8270C
Diethyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dimethylphenol	ND	10	ug/L	SW846 8270C
Dimethyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-butyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-octyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dinitrophenol	ND	50	ug/L	SW846 8270C
4,6-Dinitro- 2-methylphenol	ND	50	ug/L	SW846 8270C
2,4-Dinitrotoluene	ND	10	ug/L	SW846 8270C
2,6-Dinitrotoluene	ND	10	ug/L	SW846 8270C
Fluoranthene	ND	10	ug/L	SW846 8270C
Fluorene	ND	10	ug/L	SW846 8270C
Hexachlorobenzene	ND	10	ug/L	SW846 8270C
Hexachlorobutadiene	ND	10	ug/L	SW846 8270C
Hexachlorocyclopenta- diene	ND	50	ug/L	SW846 8270C
Hexachloroethane	ND	10	ug/L	SW846 8270C
Indeno(1,2,3-cd)pyrene	ND	10	ug/L	SW846 8270C
Isophorone	ND	10	ug/L	SW846 8270C
2-Methylnaphthalene	ND	10	ug/L	SW846 8270C
2-Methylphenol	ND	10	ug/L	SW846 8270C
4-Methylphenol	ND	10	ug/L	SW846 8270C
Naphthalene	ND	10	ug/L	SW846 8270C
2-Nitroaniline	ND	50	ug/L	SW846 8270C
3-Nitroaniline	ND	50	ug/L	SW846 8270C
4-Nitroaniline	ND	50	ug/L	SW846 8270C
Nitrobenzene	ND	10	ug/L	SW846 8270C
2-Nitrophenol	ND	10	ug/L	SW846 8270C
4-Nitrophenol	ND	50	ug/L	SW846 8270C
N-Nitrosodi-n-propyl- amine	ND	10	ug/L	SW846 8270C
N-Nitrosodiphenylamine	ND	10	ug/L	SW846 8270C
2,2'-oxybis(1-Chloropropane)	ND	10	ug/L	SW846 8270C
Pentachlorophenol	ND	50	ug/L	SW846 8270C

(Continued on next page)

SEVERN TRENT LABORATORIES, II

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory re-
 change. Actions taken based on these results are the responsibility

Lot #: COH150146
 UXB International
 Dunn Field, Def Depot Memphis
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS
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Client Sample ID: DF/S1/0227/IDW/003

Sample #: 001 Date Sampled: 08/14/00 09:00 Date Received: 08/14/00

Volatile Organics by GC/MS

Vinyl chloride	ND	500	ug/L
Xylenes (total)	ND	250	ug/L

J Estimated result. Result is less than RL.

Semivolatile Organic Compounds by GC/MS

Pyridine	ND	20	ug/L
Acenaphthene	ND	10	ug/L
Acenaphthylene	ND	10	ug/L
Anthracene	ND	10	ug/L
Benzo(a)anthracene	ND	10	ug/L
Benzo(a)pyrene	ND	10	ug/L
Benzo(b)fluoranthene	ND	10	ug/L
Benzo(k)fluoranthene	ND	10	ug/L
Benzo(ghi)perylene	ND	10	ug/L
bis(2-Chloroethoxy) methane	ND	10	ug/L
bis(2-Chloroethyl)- ether	ND	10	ug/L
bis(2-Ethylhexyl) phthalate	30	10	ug/L
4-Bromophenyl phenyl ether	ND	10	ug/L
Butyl benzyl phthalate	ND	10	ug/L
Carbazole	ND	10	ug/L
4-Chloroaniline	ND	10	ug/L
4-Chloro-3-methylphenol	ND	10	ug/L
2-Chloronaphthalene	ND	10	ug/L
2-Chlorophenol	ND	10	ug/L
4-Chlorophenyl phenyl ether	ND	10	ug/L
Chrysene	ND	10	ug/L
Dibenz(a,h)anthracene	ND	10	ug/L
Dibenzofuran	ND	10	ug/L
1,2-Dichlorobenzene	ND	10	ug/L
1,3-Dichlorobenzene	ND	10	ug/L

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH150146 UXB International PAGE 4
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/S1/0227/IDW/003

Sample #: 001 Date Sampled: 08/14/00 09:00 Date Received: 08/15/00 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

C Estimated result. Result concentration exceeds the calibration range.

Volatile Organics by GC/MS

Reviewed

Acetone	140 J	1000	ug/L	SW846 8260B
Benzene	ND	250	ug/L	SW846 8260B
Bromodichloromethane	ND	250	ug/L	SW846 8260B
Bromoform	ND	250	ug/L	SW846 8260B
Bromomethane	ND	500	ug/L	SW846 8260B
2-Butanone	ND	1000	ug/L	SW846 8260B
Carbon disulfide	ND	250	ug/L	SW846 8260B
Carbon tetrachloride	ND	250	ug/L	SW846 8260B
Chlorobenzene	ND	250	ug/L	SW846 8260B
Dibromochloromethane	ND	250	ug/L	SW846 8260B
Chloroethane	ND	500	ug/L	SW846 8260B
Chloroform	8200	250	ug/L	SW846 8260B
Chloromethane	ND	500	ug/L	SW846 8260B
1,1-Dichloroethane	ND	250	ug/L	SW846 8260B
1,2-Dichloroethane	ND	250	ug/L	SW846 8260B
1,1-Dichloroethene	ND	250	ug/L	SW846 8260B
1,2-Dichloroethene	ND	250	ug/L	SW846 8260B
(total)				
1,2-Dichloropropane	ND	250	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	250	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	250	ug/L	SW846 8260B
Ethylbenzene	ND	250	ug/L	SW846 8260B
2-Hexanone	ND	1000	ug/L	SW846 8260B
Methylene chloride	ND	250	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	1000	ug/L	SW846 8260B
Styrene	ND	250	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	250	ug/L	SW846 8260B
Tetrachloroethene	ND	250	ug/L	SW846 8260B
Toluene	ND	250	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	250	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	250	ug/L	SW846 8260B
Trichloroethene	ND	250	ug/L	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH150146 UXB International PAGE 3
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0227/IDW/003

Sample #: 001 Date Sampled: 08/14/00 09:00 Date Received: 08/15/00 Matrix: WATER

Volatile Organics by GC/MS

Reviewed

Acetone	57 J	200	ug/L	SW846 8260B
Benzene	ND	50	ug/L	SW846 8260B
Bromodichloromethane	15 J	50	ug/L	SW846 8260B
Bromoform	ND	50	ug/L	SW846 8260B
Bromomethane	ND	100	ug/L	SW846 8260B
2-Butanone	25 J	200	ug/L	SW846 8260B
Carbon disulfide	ND	50	ug/L	SW846 8260B
Carbon tetrachloride	ND	50	ug/L	SW846 8260B
Chlorobenzene	ND	50	ug/L	SW846 8260B
Dibromochloromethane	ND	50	ug/L	SW846 8260B
Chloroethane	ND	100	ug/L	SW846 8260B
Chloroform	7000 E	50	ug/L	SW846 8260B
Chloromethane	ND	100	ug/L	SW846 8260B
1,1-Dichloroethane	ND	50	ug/L	SW846 8260B
1,2-Dichloroethane	ND	50	ug/L	SW846 8260B
1,1-Dichloroethene	ND	50	ug/L	SW846 8260B
1,2-Dichloroethene	ND	50	ug/L	SW846 8260B
(total)				
1,2-Dichloropropane	ND	50	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	50	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	50	ug/L	SW846 8260B
Ethylbenzene	ND	50	ug/L	SW846 8260B
2-Hexanone	ND	200	ug/L	SW846 8260B
Methylene chloride	ND	50	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	200	ug/L	SW846 8260B
Styrene	ND	50	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	50	ug/L	SW846 8260B
Tetrachloroethene	ND	50	ug/L	SW846 8260B
Toluene	ND	50	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	50	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	50	ug/L	SW846 8260B
Trichloroethene	ND	50	ug/L	SW846 8260B
Vinyl chloride	ND	100	ug/L	SW846 8260B
Xylenes (total)	ND	50	ug/L	SW846 8260B

J Estimated result Result is less than RL.

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH150146 UXB International PAGE 2
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0227/IDW/003

Sample #: 001 Date Sampled: 08/14/00 09:00 Date Received: 08/15/00 Matrix: WATER

Organochlorine Pesticides

Reviewed

Aldrin	0.089 J,P	0.50	ug/L	SW846 8081A
Heptachlor epoxide	0.065 J,P	0.50	ug/L	SW846 8081A
Endosulfan I	ND	0.50	ug/L	SW846 8081A
Dieldrin	ND	0.50	ug/L	SW846 8081A
4,4'-DDE	ND	0.50	ug/L	SW846 8081A
Endrin	ND	0.50	ug/L	SW846 8081A
Endrin ketone	ND	0.50	ug/L	SW846 8081A
Endrin aldehyde	ND	0.50	ug/L	SW846 8081A
Endosulfan II	ND	0.50	ug/L	SW846 8081A
4,4'-DDD	ND	0.50	ug/L	SW846 8081A
Endosulfan sulfate	ND	0.50	ug/L	SW846 8081A
4,4'-DDT	ND	0.50	ug/L	SW846 8081A
Methoxychlor	ND	1.0	ug/L	SW846 8081A
alpha-Chlordane	ND	0.50	ug/L	SW846 8081A
gamma-Chlordane	ND	0.50	ug/L	SW846 8081A
Toxaphene	ND	20	ug/L	SW846 8081A

J Estimated result. Result is less than RL.

P The percent difference between the original and confirmation analyses is greater than 25%.

PCBs by SW-846 8082

Reviewed

Aroclor 1016	ND	10	ug/L	SW846 8082
Aroclor 1221	ND	10	ug/L	SW846 8082
Aroclor 1232	ND	10	ug/L	SW846 8082
Aroclor 1242	ND	10	ug/L	SW846 8082
Aroclor 1248	ND	10	ug/L	SW846 8082
Aroclor 1254	ND	10	ug/L	SW846 8082
Aroclor 1260	ND	10	ug/L	SW846 8082

SAMPLE DILUTED DUE TO RAINING

Chlorinated Herbicides by CC

Reviewed

2,4-D	ND	40	ug/L	SW846 8151A
2,4,5-TP (Silvex)	ND	10	ug/L	SW846 8151A

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: COH150146 UXB International PAGE 1
 Dunn Field, Def Depot Memphis Date Reported: 8/29/00
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/S1/0227/IDW/003

Sample #: 001 Date Sampled: 08/14/00 09:00 Date Received: 08/15/00 Matrix: WATER

Trace Inductively Coupled Plasma (ICP) Metals					Reviewed
Silver	1.4 B	10	ug/L	SW846 6010B	
Arsenic	6.4 B	10	ug/L	SW846 6010B	
Cadmium	0.66 B	5	ug/L	SW846 6010B	
Chromium	52.4	10	ug/L	SW846 6010B	
Lead	12.4	3	ug/L	SW846 6010B	
Antimony	10.2 B	60	ug/L	SW846 6010B	
Selenium	ND	5	ug/L	SW846 6010B	
Thallium	5.6 B	10	ug/L	SW846 6010B	

Inductively Coupled Plasma (ICP) Metals					Reviewed
Aluminum	1120	200	ug/L	SW846 6010B	
Barium	176 B	200	ug/L	SW846 6010B	
Beryllium	0.090 B	5	ug/L	SW846 6010B	
Calcium	42900	5000	ug/L	SW846 6010B	
Cobalt	ND	50	ug/L	SW846 6010B	
Copper	30.1	25	ug/L	SW846 6010B	
Iron	1410	100	ug/L	SW846 6010B	
Potassium	4070 B	5000	ug/L	SW846 6010B	
Magnesium	12500	5000	ug/L	SW846 6010B	
Manganese	169	15	ug/L	SW846 6010B	
Sodium	1020000	25000	ug/L	SW846 6010B	
Nickel	8.7 B	40	ug/L	SW846 6010B	
Vanadium	2.8 B	50	ug/L	SW846 6010B	
Zinc	188	20	ug/L	SW846 6010B	

Mercury in Liquid Waste (Manual Cold-Vapor)					Reviewed
Mercury	0.46	0.2	ug/L	SW846 7470A	

8 Estimated result. Result is less than RL.

Organochlorine Pesticides					Reviewed
alpha-BHC	ND	0.50	ug/L	SW846 8081A	
beta-BHC	ND	0.50	ug/L	SW846 8081A	
delta-BHC	ND	0.50	ug/L	SW846 8081A	
gamma-BHC (Lindane)	ND	0.50	ug/L	SW846 8081A	
Heptachlor	0.14 J,P	0.50	ug/L	SW846 8081A	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C18220250 UXB International PAGE 5
 Dunn Field, Def Depot Memphis Date Reported: 3/01/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DF/24-A/1052/IDW/001

Sample #: 001 Date Sampled: 02/21/01 08:40 Date Received: 02/22/01 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

Di-n-butyl phthalate	ND	10	ug/L	SW846 8270C
Di-n-octyl phthalate	ND	10	ug/L	SW846 8270C
2,4-Dinitrophenol	ND	50	ug/L	SW846 8270C
4,6-Dinitro- 2-methylphenol	ND	50	ug/L	SW846 8270C
2,4-Dinitrotoluene	ND	10	ug/L	SW846 8270C
2,6-Dinitrotoluene	ND	10	ug/L	SW846 8270C
Fluoranthene	ND	10	ug/L	SW846 8270C
Fluorene	ND	10	ug/L	SW846 8270C
Hexachlorobenzene	ND	10	ug/L	SW846 8270C
Hexachlorobutadiene	ND	10	ug/L	SW846 8270C
Hexachlorocyclopenta- diene	ND	50	ug/L	SW846 8270C
Hexachloroethane	ND	10	ug/L	SW846 8270C
Indeno(1,2,3-cd)pyrene	ND	10	ug/L	SW846 8270C
Isophorone	ND	10	ug/L	SW846 8270C
2-Methylnaphthalene	ND	10	ug/L	SW846 8270C
2-Methylphenol	ND	10	ug/L	SW846 8270C
4-Methylphenol	ND	10	ug/L	SW846 8270C
Naphthalene	ND	10	ug/L	SW846 8270C
2-Nitroaniline	ND	50	ug/L	SW846 8270C
3-Nitroaniline	ND	50	ug/L	SW846 8270C
4-Nitroaniline	ND	50	ug/L	SW846 8270C
Nitrobenzene	ND	10	ug/L	SW846 8270C
2-Nitrophenol	ND	10	ug/L	SW846 8270C
4-Nitrophenol	ND	50	ug/L	SW846 8270C
N-Nitrosodi-n-propyl- amine	ND	10	ug/L	SW846 8270C
N-Nitrosodiphenylamine	ND	10	ug/L	SW846 8270C
2,2'-oxybis(1-Chloropropane)	ND	10	ug/L	SW846 8270C
Pentachlorophenol	ND	50	ug/L	SW846 8270C
Phenanthrene	ND	10	ug/L	SW846 8270C
Phenol	5.1 J	10	ug/L	SW846 8270C
Pyrene	ND	10	ug/L	SW846 8270C
1,2,4-Trichloro- benzene	ND	10	ug/L	SW846 8270C
2,4,5-Trichloro- phenol	ND	10	ug/L	SW846 8270C

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: C1B220250 UXB International PAGE 4
 Dunn Field, Def Depot Memphis Date Reported: 3/01/01
 Project Number: UXB 7512-060

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: DE/24-A/1052/IDW/001

Sample #: 001 Date Sampled: 02/21/01 08:40 Date Received: 02/22/01 Matrix: WATER

Semivolatile Organic Compounds by GC/MS

Reviewed

Pyridine	ND	20	ug/L	SW846 8270C
Acenaphthene	ND	10	ug/L	SW846 8270C
Acenaphthylene	ND	10	ug/L	SW846 8270C
Anthracene	ND	10	ug/L	SW846 8270C
Benzo(a)anthracene	ND	10	ug/L	SW846 8270C
Benzo(a)pyrene	ND	10	ug/L	SW846 8270C
Benzo(b)fluoranthene	ND	10	ug/L	SW846 8270C
Benzo(k)fluoranthene	ND	10	ug/L	SW846 8270C
Benzo(ghi)perylene	ND	10	ug/L	SW846 8270C
bis(2-Chloroethoxy) methane	ND	10	ug/L	SW846 8270C
bis(2-Chloroethyl)- ether	ND	10	ug/L	SW846 8270C
bis(2-Ethylhexyl) phthalate	16	10	ug/L	SW846 8270C
4-Bromophenyl phenyl ether	ND	10	ug/L	SW846 8270C
Butyl benzyl phthalate	ND	10	ug/L	SW846 8270C
Carbazole	ND	10	ug/L	SW846 8270C
4-Chloroaniline	ND	10	ug/L	SW846 8270C
4-Chloro-3-methylphenol	ND	10	ug/L	SW846 8270C
2-Chloronaphthalene	ND	10	ug/L	SW846 8270C
2-Chlorophenol	ND	10	ug/L	SW846 8270C
4-Chlorophenyl phenyl ether	ND	10	ug/L	SW846 8270C
Chrysene	ND	10	ug/L	SW846 8270C
Dibenz(a,h)anthracene	ND	10	ug/L	SW846 8270C
Dibenzofuran	ND	10	ug/L	SW846 8270C
1,2-Dichlorobenzene	ND	10	ug/L	SW846 8270C
1,3-Dichlorobenzene	ND	10	ug/L	SW846 8270C
1,4-Dichlorobenzene	ND	10	ug/L	SW846 8270C
3,3'-Dichlorobenzidine	ND	50	ug/L	SW846 8270C
2,4-Dichlorophenol	7.2 J	10	ug/L	SW846 8270C
Diethyl phthalate	3.6 J	10	ug/L	SW846 8270C
2,4-Dimethylphenol	ND	10	ug/L	SW846 8270C
Dimethyl phthalate	ND	10	ug/L	SW846 8270C

(Continued on next page)

Site 24A and 24B Water

DRAFT

WASTE DISPOSAL REQUESTS

DRAFT

Fuel Water Mix Found During Closeout

DRAFT

Site 1 Soil

DRAFT

Site 1 Water

DRAFT

Site 1 and 24A Soil

DRAFT

Site 24A and 24B Soil

DRAFT

SOIL/SUBTITLE D LANDFILL

DRAFT

654 313

**THE TUNICA LANDFILL**

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST**GENERATOR**Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description**Actual Quantity****Units****Container Type**

Non-Hazardous Soil

- ☐
- Pounds
-
- ☒
- Tons
-
- ☐
- Cu. Yd.
-
- ☐
- Cu. Ft.

- ☐
- Drum
- ☒
- Truck
-
- ☐
- Carton
- ☐
- Box
-
- ☐
- Bag
- ☐
- Other: _____
-
- Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Generator Authorized Agent

Signature

Shipment Date

TRANSPORTERTruck No.: 147-17Transporter Phone No.: (662) 429-2200Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: _____

Nesbit, MS 38651Vehicle Certification: 277

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Signature

Pickup Date

Signature

Delivery Date

DESTINATIONSite Name: Trash Hunters of Tunica, Ins dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

Signature

Receipt Date

001027

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

654

314

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description**Actual Quantity****Units****Container Type**

Non-Hazardous Soil

- ☐
- Pounds
-
- ☒
- Tons
-
- ☐
- Cu. Yd.
-
- ☐
- Cu. Ft.

- ☐
- Drum
- ☒
- Truck
-
- ☐
- Carton
- ☐
- Box
-
- ☐
- Bag
- ☐
- Other: _____
-
- Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Mike Lee
Generator Authorized AgentMike Lee
Signature04/25/01
Shipment Date

TRANSPORTER

Truck No.: K 015Transporter Phone No.: (662) 429-2200Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: _____

Nesbit, MS 38651

Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Mike Lee
Signature 04/25/01
Pickup Date1/1
Signature 1/1
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001024

Signature _____ Receipt Date _____

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:

654

315

**THE TUNICA LANDFILL**

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST**GENERATOR**Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description**Actual Quantity****Units****Container Type**

Non-Hazardous Soil

- ☐
- Pounds
-
- ☒
- Tons
-
- ☐
- Cu. Yd.
-
- ☐
- Cu. Ft.

- ☐
- Drum
- ☒
- Truck
-
- ☐
- Carton
- ☐
- Box
-
- ☐
- Bag
- ☐
- Other: _____
-
- Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Generator Authorized Agent

Signature

Shipment Date

TRANSPORTERTruck No.: 11-11Transporter Phone No.: (662) 429-2200Transporter Name: Matthews TruckingDriver Name (print): MatthewsAddress: 1340 Gwynn Rd.Vehicle License No./State: MS-1111Nesbit, MS 38651

Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Signature

Pickup Date

Signature

Delivery Date

DESTINATIONSite Name: Trash Hunters of Tunica, Ins dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

Signature

Receipt Date

001025

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

654 316

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0728010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Mike Lee
Generator Authorized Agent

[Signature]
Signature

04/25/01
Shipment Date

TRANSPORTER

Truck No.: _____

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): Tommy Kess

Address: 1340 Gwynn Rd.

Vehicle License No./State: MS 17-5

Nesbit, MS 38651

Vehicle Certification: 01-277

With my signature, I certify that the above material was picked up at the Generator site listed above:

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Tommy Kess 04/25/01
Signature Pickup Date

[Signature] 1/1
Signature Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001026

[Signature] 1/1
Signature Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:

654 317



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Mike Lee
Generator Authorized Agent

Mike Lee
Signature

04/24/01
Shipment Date

TRANSPORTER

Truck No.: DM4
Transporter Name: Matthews Trucking
Address: 1340 Gwynn Rd.
Nesbit, MS 38651

Transporter Phone No.: (662) 429-2200
Driver Name (print): L. Tankersley
Vehicle License No./State: A-07579 MS
Vehicle Certification: 400277

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

L. Tankersley
Signature

4/24/01
Pickup Date

1/1
Signature

1/1
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica Landfill
Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Phone No.: 1-877-989-2783
Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001014

Signature _____

Receipt Date _____

TOTAL TO DATE: _____



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654

318

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

[Signature]
Generator Authorized Agent

[Signature]
Signature

1/24/01
Shipment Date

TRANSPORTER

Truck No.: 1271

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: MS 38651

Nesbit, MS 38651

Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

[Signature] 1/24/01
Signature Pickup Date

[Signature] 1/24/01
Signature Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001015

[Signature] Receipt Date

TOTAL TO DATE:

654

319

**THE TUNICA LANDFILL**

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST**GENERATOR**Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description**Actual Quantity****Units****Container Type**

Non-Hazardous Soil

- ☐
- Pounds
-
- ☒
- Tons
-
- ☐
- Cu. Yd.
-
- ☐
- Cu. Ft.

- ☐
- Drum
- ☒
- Truck
-
- ☐
- Carton
- ☐
- Box
-
- ☐
- Bag
- ☐
- Other: _____
-
- Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

M. K. L.
Generator Authorized Agent[Signature]
Signature04/24/01
Shipment Date**TRANSPORTER**Truck No.: 662-17Transporter Phone No.: (662) 429-2200Transporter Name: Matthews TruckingDriver Name (print): T. MatthewsAddress: 1340 Gwynn Rd.Vehicle License No./State: 3K22Nesbit, MS 38651Vehicle Certification: 910277

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

T. Matthews
Signature04/24/01
Pickup Date[Signature]
Signature04/24/01
Delivery Date**DESTINATION**Site Name: Trash Hunters of Tunica, Ins dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

001016

Signature

Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 320

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Mike Lee
Generator Authorized Agent

Mike Lee
Signature

04/24/01
Shipment Date

TRANSPORTER

Truck No.: _____

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): Matthews

Address: 1340 Gwynn Rd.

Vehicle License No./State: MS

Nesbit, MS 38651

Vehicle Certification: MS

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Mike Lee
Signature

04/24/01
Pickup Date

Mike Lee
Signature

04/24/01
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001017

Signature

Receipt Date

TOTAL TO DATE:

654

321



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.

Address: _____

Memphis, TN 38114

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
 Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Mark Lee
 Generator Authorized Agent

Mark Lee
 Signature

04/24/01
 Shipment Date

TRANSPORTER

Truck No.: _____

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: _____

Nesbit, MS 38651

Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Mark Lee
 Signature

04/24/01
 Pickup Date

Mark Lee
 Signature

04/24/01
 Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

001018

Signature

Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL
A WASTE MANAGEMENT COMPANY
NON-HAZARDOUS WASTE MANIFEST

654 322

GENERATOR

Name of Generator: Memphis Depot DLA
Address: 2163 Airways Blvd.
Memphis, TN 38114
Phone No.: (901) 544-0612
Waste ID. Code No.: CT 1638
Special Handling Instructions and Additional Information: _____

Waste Generation Location: SAME
Address: _____
Phone No.: (_____) _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

[Signature] Generator Authorized Agent [Signature] Signature 04/24/01 Shipment Date

TRANSPORTER

Truck No.: 5-177-5
Transporter Name: Matthews Trucking
Address: 1340 Gwynn Rd.
Nesbit, MS 38651

Transporter Phone No.: (662) 429-2200
Driver Name (print): Billy Sexton
Vehicle License No./State: 10 1875
Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

[Signature] Signature 04/24/01 Pickup Date

[Signature] Signature 04/24/01 Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill
Site Address: 6035 Bowdre Road Robinsonville, MS 38664
Discrepancies: _____

Phone No.: 1-877-989-2783
Time: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001019 Signature _____ Receipt Date _____

TOTAL TO DATE:

654

323



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Mike L.
Generator Authorized Agent

Signature

04/13/01
Shipment Date

TRANSPORTER

Truck No.: _____

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: _____

Nesbit, MS 38651

Vehicle Certification: 16-05-2001

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Signature

04/13/01
Pickup Date

Signature

04/13/01
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

001020

Signature

04/13/01
Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 324

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Mike Lee
Generator Authorized Agent

Mike Lee
Signature

04/24/01
Shipment Date

TRANSPORTER

Truck No.: 10015

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: _____

Nesbit, MS 38651

Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

04/24/01
Signature Pickup Date

1/1
Signature Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001021

Signature _____ Receipt Date _____

TOTAL TO DATE:

654

325



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
 Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Mike Lee
 Generator Authorized Agent

[Signature]
 Signature

04/24/01
 Shipment Date

TRANSPORTER

Truck No.: 2ndTransporter Phone No.: (662) 429-2200Transporter Name: Matthews TruckingDriver Name (print): [Signature]Address: 1340 Gwynn Rd.Vehicle License No./State: A-12345678Nesbit, MS 38651Vehicle Certification: 6710277

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

[Signature]
 Signature

04/24/01
 Pickup Date

[Signature]
 Signature

04/24/01
 Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

001022

Signature

Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 326

GENERATOR

Name of Generator: Memphis Depot DLA

Waste-
Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SYV-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

[Signature]
Generator Authorized Agent

[Signature]
Signature

04/24/01
Shipment Date

TRANSPORTER

Truck No.: 2011-17

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): [Signature]

Address: 1340 Gwynn Rd.

Vehicle License No./State: 165

Nesbit, MS 38651

Vehicle Certification: 277

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

[Signature]
Signature

4/25/01
Pickup Date

[Signature]
Signature

1/1
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)
001023

[Signature]
Signature

1/1
Receipt Date

TOTAL TO DATE:

654

327



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
 Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee
 Generator Authorized Agent

Michael Lee
 Signature

04/23/01
 Shipment Date

TRANSPORTER

Truck No.: 21113Transporter Phone No.: (662) 429-2200Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: _____

Nesbit, MS 38651

Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Michael Lee
 Signature

04/23/01
 Pickup Date

Michael Lee
 Signature

04/23/01
 Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

001002

Signature

Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 328

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

[Signature]
Generator Authorized Agent

[Signature]
Signature

04/23/01
Shipment Date

TRANSPORTER

Truck No.: DMJ

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): L. Tamm

Address: 1340 Gwynn Rd.

Vehicle License No./State: A-07577 ALA

Nesbit, MS 38651

Vehicle Certification: 4400077

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

[Signature]
Signature

4/23/01
Pickup Date

[Signature]
Signature

1/1
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001001

[Signature]
Signature

1/1
Receipt Date

TOTAL TO DATE:

654 329



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
 Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee
 Generator Authorized Agent

Michael Lee
 Signature

04/23/01
 Shipment Date

TRANSPORTER

Truck No.: K-11-5Transporter Phone No.: (662) 429-2200Transporter Name: Matthews TruckingDriver Name (print): Billy SextonAddress: 1340 Gwynn Rd.Vehicle License No./State: 710-1278Nesbit, MS 38651Vehicle Certification: SD

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Billy Sexton 4/23/01
 Signature Pickup Date

Billy Sexton 4/23/01
 Signature Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001003

Signature _____ Receipt Date _____

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 330

GENERATOR

Name of Generator: Memphis Depot DLA
Address: 2163 Airways Blvd.
Memphis, TN 38114
Phone No.: (901) 544-0612
Waste ID. Code No.: CT 1638
Special Handling Instructions and Additional Information: _____

Waste Generation Location: SAME
Address: _____
Phone No.: (_____) _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee
Generator Authorized Agent

Michael Lee
Signature

04/22/01
Shipment Date

TRANSPORTER

Truck No.: 1921-17
Transporter Name: Matthews Trucking
Address: 1340 Gwynn Rd.
Nesbit, MS 38651

Transporter Phone No.: (662) 429-2200
Driver Name (print): T. Matthews
Vehicle License No./State: MS-31725
Vehicle Certification: 2/17

With my signature, I certify that the above material was picked up at the Generator site listed above.

Michael Lee
Signature 04/23/01
Pickup Date

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Michael Lee
Signature 04/23/01
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill
Site Address: 6035 Bowdre Road Robinsonville, MS 38664
Discrepancies: _____

Phone No.: 1-877-989-2783
Time: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001004

Signature

Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:

654 331

**THE TUNICA LANDFILL**

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST**GENERATOR**Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.

Address: _____

Memphis, TN 38114Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐
- Pounds
-
- ☒
- Tons
-
- ☐
- Cu. Yd.
-
- ☐
- Cu. Ft.

- ☐
- Drum
- ☒
- Truck
-
- ☐
- Carton
- ☐
- Box
-
- ☐
- Bag
- ☐
- Other: _____
-
- Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee
Generator Authorized AgentMichael Lee
Signature04/23/01
Shipment Date**TRANSPORTER**Truck No.: Rm 21Transporter Phone No.: (662) 429-2200Transporter Name: Matthews TruckingDriver Name (print): DANNY L. WILLARDAddress: 1340 Gwynn Rd.Vehicle License No./State: A-33491Nesbit, MS 38651Vehicle Certification: 190817

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Danny L. Willard 4.23.01
Signature Pickup DateDanny L. Willard 4.23.01
Signature Delivery Date**DESTINATION**Site Name: Trash Hunters of Tunica, Inc dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001005

Signature _____

Receipt Date _____

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 332

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

[Signature]
Generator Authorized Agent

[Signature]
Signature

04/23/01
Shipment Date

TRANSPORTER

Truck No.: 30113

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): [Signature]

Address: 1340 Gwynn Rd.

Vehicle License No./State: [Signature]

Nesbit, MS 38651

Vehicle Certification: [Signature]

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

[Signature] 04/23/01
Signature Pickup Date

[Signature] 04/23/01
Signature Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001006

[Signature] Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:

654

333



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
 Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee
 Generator Authorized Agent

Michael Lee
 Signature

04123101
 Shipment Date

TRANSPORTER

Truck No.: 3m4Transporter Phone No.: (662) 429-2200Transporter Name: Matthews TruckingDriver Name (print): MatthewsAddress: 1340 Gwynn Rd.Vehicle License No./State: A 07074 MSNesbit, MS 38651Vehicle Certification: 11/12/77

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Matthews
 Signature

11-1-01
 Pickup Date

Matthews
 Signature

11-1-01
 Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Ins dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

001007

Signature

11-1-01
 Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 334

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee
Generator Authorized Agent

Michael Lee
Signature

4/23/01
Shipment Date

TRANSPORTER

Truck No.: 111-5

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: _____

Nesbit, MS 38651

Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Michael Lee
Signature

4/23/01
Pickup Date

Michael Lee
Signature

4/23/01
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001008

Signature

Receipt Date

TOTAL TO DATE:

654

335

**THE TUNICA LANDFILL**

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST**GENERATOR**Name of Generator: Memphis Depot DLAWaste Generation Location: SAMEAddress: 2163 Airways Blvd.

Address: _____

Memphis, TN 38114Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐
- Pounds
-
- ☒
- Tons
-
- ☐
- Cu. Yd.
-
- ☐
- Cu. Ft.

- ☐
- Drum
- ☒
- Truck
-
- ☐
- Carton
- ☐
- Box
-
- ☐
- Bag
- ☐
- Other: _____
-
- Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee
Generator Authorized AgentMichael Lee
Signature04 12 3 10
Shipment Date**TRANSPORTER**

Truck No.: _____

Transporter Phone No.: (662) 429-2200Transporter Name: Matthews Trucking

Driver Name (print): _____

Address: 1340 Gwynn Rd.

Vehicle License No./State: _____

Nesbit, MS 38651

Vehicle Certification: _____

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Michael Lee
Signature

Pickup Date

Michael Lee
Signature

Delivery Date

DESTINATIONSite Name: Trash Hunters of Tunica, Inc dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

001009

Signature

Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 336

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee
Generator Authorized Agent

Michael Lee
Signature

04/23/01
Shipment Date

TRANSPORTER

Truck No.: 87M15
Transporter Name: Matthews Trucking
Address: 1340 Gwynn Rd.
Nesbit, MS 38651

Transporter Phone No.: (662) 429-2200
Driver Name (print): Matthews
Vehicle License No./State: 8-1001 MS
Vehicle Certification: 4/10/01

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Matthews
Signature Pickup Date

Matthews
Signature Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica Landfill
Site Address: 6035 Bowdre Road Robinsonville, MS 38664
Discrepancies: _____

Phone No.: 1-877-989-2783
Time: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001010

Signature

Receipt Date

TOTAL TO DATE:

654

337



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLAAddress: 2163 Airways Blvd.Memphis, TN 38114Phone No.: (901) 544-0612Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Waste Generation Location: SAME

Address: _____

Phone No.: (_____) _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description

Actual Quantity

Units

Container Type

Non-Hazardous Soil

- ☐ Pounds
☒ Tons
☐ Cu. Yd.
☐ Cu. Ft.

- ☐ Drum ☒ Truck
☐ Carton ☐ Box
☐ Bag ☐ Other: _____
 Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael L. Co.
 Generator Authorized Agent

Michael L. Co.
 Signature

4/23/01
 Shipment Date

TRANSPORTER

Truck No.: 5-1-5Transporter Name: Matthews TruckingAddress: 1340 Gwynn Rd.Nesbit, MS 38651Transporter Phone No.: (662) 429-2200Driver Name (print): Matthews, MichaelVehicle License No./State: MS 1-23-01Vehicle Certification: MS 1-23-01

With my signature, I certify that the above material was picked up at the Generator site listed above.

Michael L. Co.
 Signature

4/23/01
 Pickup Date

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

Michael L. Co.
 Signature

4/23/01
 Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica LandfillPhone No.: 1-877-989-2783Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)

001011

Signature

Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

NON-HAZARDOUS WASTE MANIFEST

654 338

GENERATOR

Name of Generator: Memphis Depot DLA

Waste Generation Location: SAME

Address: 2163 Airways Blvd.
Memphis, TN 38114

Address: _____

Phone No.: (901) 544-0612

Phone No.: (_____) _____

Waste ID. Code No.: CT 1638

Special Handling Instructions and Additional Information: _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

[Signature]
Generator Authorized Agent

[Signature]
Signature

04/23/01
Shipment Date

TRANSPORTER

Truck No.: 17-1

Transporter Phone No.: (662) 429-2200

Transporter Name: Matthews Trucking

Driver Name (print): T. J. Matthews

Address: 1340 Gwynn Rd.

Vehicle License No./State: A-11125

Nesbit, MS 38651

Vehicle Certification: 07.1.11

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

[Signature]
Signature

04/23/01
Pickup Date

[Signature]
Signature

04/23/01
Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica Landfill

Phone No.: 1-877-989-2783

Site Address: 6035 Bowdre Road Robinsonville, MS 38664

Time: _____

Discrepancies: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print)
001012

Signature

Receipt Date

White - LANDFILL Yellow - GENERATOR Pink - TRANSPORTER Goldenrod - CONTRACTOR

TOTAL TO DATE:



THE TUNICA LANDFILL

A WASTE MANAGEMENT COMPANY

654 339

NON-HAZARDOUS WASTE MANIFEST

GENERATOR

Name of Generator: Memphis Depot DLA
Address: 2163 Airways Blvd.
Memphis, TN 38114
Phone No.: (901) 544-0612
Waste ID. Code No.: CT 1638
Special Handling Instructions and Additional Information: _____

Waste Generation Location: SAME
Address: _____
Phone No.: (_____) _____

Trash Hunters of Tunica dba THE TUNICA LANDFILL Permit # SW-0720010459 Ticket Number: _____ Customer Number: _____

RESPONSIBLE AGENCY: Mississippi Dept. of Environmental Quality (601) 961-5171

Waste Description	Actual Quantity	Units	Container Type
Non-Hazardous Soil		<input type="checkbox"/> Pounds <input checked="" type="checkbox"/> Tons <input type="checkbox"/> Cu. Yd. <input type="checkbox"/> Cu. Ft.	<input type="checkbox"/> Drum <input checked="" type="checkbox"/> Truck <input type="checkbox"/> Carton <input type="checkbox"/> Box <input type="checkbox"/> Bag <input type="checkbox"/> Other: _____ Volume: _____

With my signature, I certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law or regulation, is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations.

Michael Lee Generator Authorized Agent
[Signature] Signature
04/23/01 Shipment Date

TRANSPORTER

Truck No.: RM4
Transporter Name: Matthews Trucking
Address: 1340 Gwynn Rd.
Nesbit, MS 38651

Transporter Phone No.: (662) 429-2200
Driver Name (print): L. [unclear]
Vehicle License No./State: A-07879 MS
Vehicle Certification: 490377

With my signature, I certify that the above material was picked up at the Generator site listed above.

With my signature, I certify that the above named material was delivered without incident to the destination listed below.

[Signature] Signature
04/23/01 Pickup Date
[Signature] Signature
04/23/01 Delivery Date

DESTINATION

Site Name: Trash Hunters of Tunica, Inc dba The Tunica Landfill
Site Address: 6035 Bowdre Road Robinsonville, MS 38664
Discrepancies: _____
Phone No.: 1-877-989-2783
Time: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge, the foregoing is true and accurate.

Name (print) 001013 Signature _____ Receipt Date _____

TOTAL TO DATE: _____

**BEST AVAILABLE
COPY**

654 340

Form Approved OMB No 2050-0039

Please print or type (Form designed for use on elite (12-pitch) typewriter)

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN4210020570	Manifest Document No 02771	2. Page 1 4	Information in the shaded areas is not required by Federal law.	
3 Generator's Name and Mailing Address 2163 Airways Blvd. Memphis Depot Caretaker Memphis, TN, 38114				A. State Manifest Document Number		
4 Generator's Phone 901-544-0812				B. State Generator's ID		
5. Transporter 1 Company Name Action Resources				C. State Transporter's ID		
6 US EPA ID Number ALR000007237				D. Transporter's Phone 800-333-8846		
7. Transporter 2 Company Name				E. State Transporter's ID		
8 US EPA ID Number				F. Transporter's Phone		
9 Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 68145				G. State Facility's ID		
10. US EPA ID Number NED981723513				H. Facility's Phone 800-282-0058		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12 Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a.	<input checked="" type="checkbox"/> RQ, Waste Toxic Solids, Organic, n.o.s. (1,4-Thioxane, bis (2-Chloroethyl) Sulfide) 6.1, UN2811, PG II, ERG154	0.10	CM	0.0010	Y	
b.	Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol < 6 ppm, 1, 4-Thioxane < 6 ppm)	0.02	CM	0.0002	Y	
c.						
d.						
J. Additional Descriptions for Materials Listed Above 11a: CH190138 11b: CH190138B 1,4 Dithiane <6ppm				K. Handling Codes for Wastes Listed Above M043/T07		
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 801-745-4999 or DLA 800-851-8081, or Frank Johnson 703-825-3792, Need CD <div style="border: 1px solid black; padding: 2px; display: inline-block;">GG0401041</div>						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee		Signature <i>Michael Lee</i>		Month Day Year 04/19/01		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>James Nurn</i>		Month Day Year 07/19/01		
Printed/Typed Name JAMES NURN		Signature		Month Day Year		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Jan. 04 2001 03:25PM P4

654 341CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1

Manifest No.

02771

SECTION I. CHARACTERISTIC WASTES P001-43 (CONTINUED)

COLUMN 1:
LINE ITEM
SEE MANIFESTCOLUMN 2:
WASTE CODE / NAMECOLUMN 3:
WASTEWATER/
NON-WASTEWATERCOLUMN 4:
HANDLING CODE

			1	2	3	4
() D009	Low Mercury, less than 260 mg/kg Mercury	() WW () Non-WW	2	3	4	
()	High Mercury Organic Subcategory	() Non-WW only	2	3	4	
()	High Mercury Inorganic Subcategory	() Non-WW only	2	3	4	
() D010	Selenium	() WW () Non-WW	1	2	3	4
() D011	Silver	() WW () Non-WW	1	2	3	4
() D012	Endrin	() WW () Non-WW	2	3	4	5
() D013	Lindane	() WW () Non-WW	2	3	4	5
() D014	Methoxychlor	() WW () Non-WW	2	3	4	5
() D015	Toxaphene	() WW () Non-WW	2	3	4	5
() D016	2,4-D	() WW () Non-WW	2	3	4	5
() D017	2,4,5-TP (Silver)	() WW () Non-WW	1	2	3	4
() D018	Benzene	() WW () Non-WW	1	2	3	4
() D019	Carbon tetrachloride	() WW () Non-WW	1	2	3	4
() D020	Chlordane	() WW () Non-WW	1	2	3	4
() D021	Chlorobenzene	() WW () Non-WW	1	2	3	4
() D022	Chloroform	() WW () Non-WW	1	2	3	4
() D023	o-Cresol	() WW () Non-WW	1	2	3	4
() D024	m-Cresol	() WW () Non-WW	1	2	3	4
() D025	p-Cresol	() WW () Non-WW	1	2	3	4
() D026	Cresol	() WW () Non-WW	1	2	3	4
() D027	1,4-Dichlorobenzene	() WW () Non-WW	1	2	3	4
() D028	1,2-Dichloroethane	() WW () Non-WW	1	2	3	4
() D029	1,1-Dichloroethylene	() WW () Non-WW	1	2	3	4
() D030	2,4-Dinitrotoluene	() WW () Non-WW	1	2	3	4
() D031	Heptachlor (and its epoxide)	() WW () Non-WW	1	2	3	4
() D032	Hexachlorobenzene	() WW () Non-WW	1	2	3	4
() D033	Hexachlorobutadiene	() WW () Non-WW	1	2	3	4
() D034	Hexachloroethane	() WW () Non-WW	1	2	3	4
() D035	Methyl ethyl ketone	() WW () Non-WW	1	2	3	4
() D036	Nitrobenzene	() WW () Non-WW	1	2	3	4
() D037	Pentachlorophenol	() WW () Non-WW	1	2	3	4
() D038	Pyridine	() WW () Non-WW	1	2	3	4
() D039	Tetrachloroethylene	() WW () Non-WW	1	2	3	4
() D040	Trichloroethylene	() WW () Non-WW	1	2	3	4
() D041	2,4,6-Trichlorophenol	() WW () Non-WW	1	2	3	4
() D042	2,4,6-Trichlorophenol	() WW () Non-WW	1	2	3	4
() D043	Vinyl chloride	() WW () Non-WW	1	2	3	4

SECTION II. AFFECT SOLVENT WASTES P001 THROUGH P005

COLUMN 1:
LINE ITEM
SEE MANIFESTCOLUMN 2:
WASTE CODE / CONSTITUENTSCOLUMN 3:
WASTEWATER/
NON-WASTEWATERCOLUMN 4:
HANDLING CODE

			1	2	3	4
() P001		() WW () Non-WW				
() P002		() WW () Non-WW				
() P003		() WW () Non-WW				
() P004		() WW () Non-WW				
() P005		() WW () Non-WW				
() 1.	ALL P001-P005	() WW () Non-WW				
() 2.	Acetone	() WW () Non-WW				
() 3.	Benzene	() WW () Non-WW				
() 4.	n-Butyl alcohol	() WW () Non-WW				
() 5.	Carbon disulfide	() WW () Non-WW				
() 6.	Carbon tetrachloride	() WW () Non-WW				
() 7.	Chlorobenzene	() WW () Non-WW				
() 8.	o-Cresol	() WW () Non-WW				
() 9.	m-Cresol (difficult to distinguish from p-cresol)	() WW () Non-WW				
() 10.	p-Cresol (difficult to distinguish from m-cresol)	() WW () Non-WW				
() 11.	Cresol - mixed isomers (sum of o-, m- and p-cresol)	() WW () Non-WW				
() 12.	Cyclohexanone	() WW () Non-WW				
() 13.	o-Dichlorobenzene	() WW () Non-WW				
() 14.	2-Ethoxyethanol (P005 only)	() WW () Non-WW				
() 15.	Ethyl acetate	() WW () Non-WW				
() 16.	Ethyl benzene	() WW () Non-WW				
() 17.	Ethyl ether	() WW () Non-WW				
() 18.	Isobutyl alcohol	() WW () Non-WW				
() 19.	Methanol	() WW () Non-WW				
() 20.	Methylene chloride	() WW () Non-WW				
() 21.	Methyl ethyl ketone	() WW () Non-WW				
() 22.	Methyl isobutyl ketone	() WW () Non-WW				
() 23.	Nitrobenzene	() WW () Non-WW				
() 24.	2-Nitropropane (P005 only)	() WW () Non-WW				
() 25.	Pyridine	() WW () Non-WW				
() 26.	Tetrachloroethylene	() WW () Non-WW				
() 27.	Toluene	() WW () Non-WW				
() 28.	1,1,1-Trichloroethane	() WW () Non-WW				
() 29.	1,1,2-Trichloroethane	() WW () Non-WW				
() 30.	Trichloroethylene	() WW () Non-WW				
() 31.	1,1,2-Trichloro-1,2,2-trifluoroethane	() WW () Non-WW				
() 32.	Trichloromonofluoroethane	() WW () Non-WW				
() 33.	Xylene - mixed isomers (sum of o-, m- and p-xylene)	() WW () Non-WW				

654 342

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1

Manifest No. _____

SECTION III. CALIFORNIA LIST WASTES.COLUMN 1:
LINE ITEM
SEE MANIFESTCOLUMN 2:
WASTE CODE / SUBCATEGORYCOLUMN 3:
WASTEWATER/
NON-WASTEWATERCOLUMN 4:
HANDLING CODEHazardous waste containing one or more of the following ☐ HW ☐ NON-HW 1 2 3 4 5 6
California List constituents:

- ☐ ALL CALIFORNIA LIST CONSTITUENTS
- ☐ Liquids with nickel greater than or equal to 134 mg/l
- ☐ Liquids with thallium greater than or equal to 130 mg/l
- ☐ Liquids with PCB's > or = 50 ppm
- ☐ Waste containing HOC's > or = 1,000 mg/kg

SECTION IV. OTHER LISTED WASTES (F001-F019, F020-F038, F039, K-, U-, AND P-CODES)COLUMN 1:
LINE ITEM
SEE MANIFESTCOLUMN 2:
WASTE CODE / SUBCATEGORYCOLUMN 3:
WASTEWATER/
NON-WASTEWATERCOLUMN 4:
HANDLING CODE

_____	_____	<input type="checkbox"/> HW <input type="checkbox"/> NON-HW	3 4 5 6
_____	_____	<input type="checkbox"/> HW <input type="checkbox"/> NON-HW	3 4 5 6
_____	_____	<input type="checkbox"/> HW <input type="checkbox"/> NON-HW	3 4 5 6
_____	_____	<input type="checkbox"/> HW <input type="checkbox"/> NON-HW	3 4 5 6
_____	_____	<input type="checkbox"/> HW <input type="checkbox"/> NON-HW	3 4 5 6

- ☐ CHECK HERE IF ADDITIONAL LISTED WASTE CODES ARE PRESENT. COMPLETE AND ATTACH LDR-1 CONTINUATION SHEET.
- ☐ CHECK HERE IF WASTE CODE F039 (MULTIPHASE LEACHATE) IS PRESENT. IDENTIFY F039 CONSTITUENTS BY COMPLETING SECTIONS II AND IV OF CHI FORM LDR-1 ADDENDUM AND ATTACH COMPLETED ADDENDUM TO THIS FORM.

SECTION V. CONTACT NAME AND DATE

Print Name: _____

Date: _____

KEY TERMS/DEFINITIONS

CLASS I SDWA SYSTEM means a Class I deep well facility regulated under the Safe Drinking Water Act (SDWA).

CWA SYSTEM means a centralized wastewater treatment facility discharging under a Clean Water Act (CWA) permit. For example, a CWA facility would treat organic or inorganic aqueous wastes and discharge the treated effluent to the local sewer system. Examples of CWA treatment systems owned and operated by Clean Harbors include the wastewater treatment operations at Baltimore (including the CBS system), Bristol, Chicago, Cincinnati and Cleveland.

CWA-EQUIVALENT SYSTEM means a "zero discharge system" that engages in "CWA-equivalent" treatment before land disposal. Zero-discharge facilities treat hazardous wastes using "CWA-equivalent" treatment methods, but do not discharge the treatment effluent to a sewer or water body (e.g., spray irrigation land farm). "CWA-equivalent" treatment methods means biological treatment for organics, alkaline chlorination, or ferrous sulfate precipitation for cyanide, precipitation/ sedimentation for metals, reduction of hexavalent chromium, or other treatment technology that can be demonstrated to perform equally or greater than these technologies.

HIGH TOC IGNITABLE LIQUIDS SUBCATEGORY means an ignitable liquid hazardous waste (waste code D001) which contains greater than or equal to 10% total organic carbon (TOC). Pursuant to 40 CFR 268.10, such wastes must be treated using organic recovery (RODS) or combustion (CBST) technology. Examples of RODS technologies include the CBS unit at Clean Harbors of Baltimore. Examples of CBST technologies include hazardous waste fuel blending and subsequent reuse at a cement kiln, or destruction at a RCRA incinerator.

WASTEWATERS are wastes that contain less than 1% by weight total organic carbon (TOC) and less than 1% by weight total suspended solids (TSS). (See 40 CFR 268.2(f))

04/18/01 WED 11:38 FAX 901 544 0838

ASCE-K(MEMPHIS)

001

04/18/01 WED 10:33 FAX

654 343

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:03PM P2

Page 1 of 3

FOR INTERNAL USE ONLY:

- ☐ Normal Profile ☐ X-Profile
☐ One Time Waste ☐ Repeat Waste
 For X-Profiles only to 917-380-8581



WASTE MATERIAL PROFILE SHEET

Profile Number CH 179885

A. GENERAL INFORMATION

GENERATOR EPA ID # TN410020570

GENERATOR CODE (Assigned by Clean Harbors)

ADDRESS 2163 Chicago Blvd.GENERATOR TECHNICAL CONTACT: Michael E. Lee

CUSTOMER CODE (Assigned by Clean Harbors)

ADDRESS P.O. Box 50397GENERATOR NAME: Marpi's Dept. Packaging Mfg.CITY MemphisSTATE TN ZIP 38114PHONE (901) 544-0444CUSTOMER NAME: Foretime Work Group Inc.CITY SummersvilleSTATE GA ZIP 29402

B. WASTE DESCRIPTION

Common Name of Waste: Degradation by-products from Motor Oil & OilProcess Generating Waste: Clean up of soil from a site that degraded chemical waste material

Process Generating Waste

(check one) if spill, origin of spilled material

- ☐ Unused chemical or product
☐ Lab Pack
☐ Spent halogenated solvents
☐ Spent non-halogenated solvents
☐ Wastewater treatment sludge from electroplating or etching operations
☐ Spent plating bath solutions or residues of plating, stripping and cleaning baths where cyanides are used in the process
☐ Wood preservation
☐ Inorganic pigment production
☐ Organic chemical production
☐ Inorganic chemical production
☐ Pesticide production
☐ Explosives production
☐ Petroleum refining
☐ Iron or steel production or finishing
☐ Primary copper production
☐ Primary lead production
☐ Primary zinc production
☐ Primary Aluminum production
☐ Ferro alloy production
☐ Secondary lead smelting
☐ Veterinary pharmaceutical production
☐ Ink formulation
☐ Coating
☐ Other _____
☐ Unknown

Source of Waste (check one)

- ☐ Unused Product or Chemical
☐ Waste by-product from process
☐ Spill clean up
☐ Lab Pack
☒ Planned site remediation
☐ Other _____

Other Process Information (check all that apply)

- ☐ Still bottoms
☐ Process soap
☐ Process development
☐ Out of date product
☐ Spent solvent waste
☐ Treatment residues
☐ Filter cake
☐ Degreasing
☐ Except recyclable material
☐ Packaged consumer goods
☐ Off-spec chemical product
☐ Zinc, Al, or tin plating
☐ Anodizing
☐ Cleaning/stripping
☐ Wastewater treatment sludges
☐ Waxes
☐ Polymers

Other Process Information (check all that apply)

- ☐ Electroplating
☐ Chromium coating
☐ Cathodic steel plating
☐ Printed circuit mfg.
☐ Cryogenic process
☐ Heat treating
☐ Separator sludge
☐ Over residues
☐ Catalyst waste
☐ Corrugated solids
☐ Composites
☐ Air, steam, or vacuum shipping
☐ Air pollution control dust
☐ Acid leaching
☐ Dipping operations
☐ Chemical manufacturing
☐ Carbon adsorption
☐ Incineration or thermal treatment
☐ Refining
☐ Drug mfg.
☐ Distillation
☐ Paste-like endg.
☐ Reaction
☐ Stripping of metals
☐ Bag house dust

Profile Number CH 179885

C. PHYSICAL PROPERTIES (at 25°C or 77°F)

PHYSICAL STATE

- ☒ SOLID WITHOUT FREE LIQUID
☐ POWDER
☐ MONOLITHIC SOLID
☐ LIQUID WITH NO SOLIDS
☐ LIQUID/SOLID MIXTURE
 % FREE LIQUID _____
 % SETTLED SOLID _____
 % TOTAL SUSPENDED SOLID _____

GAS/NEBROSOL

- FLASH POINT
☐ < 73°F
☐ 73-100°F
☐ 101-140°F
☐ 141-200°F
☒ > 200°F

- pH
☐ < 5
☐ 5-6
☒ 7 (neutral)
☐ 7.1-12.4
☐ > 12.5

SPECIFIC GRAVITY

- ☐ < 0.8 (e.g. Gasoline)
☐ 0.8-1.0 (e.g. Ethanol)
☐ 1.0 (e.g. Water)
☐ 1.0-1.2 (e.g. Antifreeze)
☒ > 1.2 (e.g. Methylene Chloride)

NUMBER OF PHASES/LAYERS

☒ 1 ☐ 2 ☐ 3

BY VOLUME (APPROX.)

- TOP MIDDLE BOTTOM
☒ NONE OR MILD
☐ STRONG

ODOR

BOILING POINT (°F)

- ☐ ≤ 100°F
☐ > 100°F

VISCOSITY (if liquid present)

- ☐ LOW (e.g. WATER)
☐ MEDIUM (e.g. MOTOR OIL)
☒ HIGH (e.g. MOLASSES)

COLOR

Black-Brown

MELTING POINT (for solids only)

- ☐ < 140°F
☐ 140-200°F
☒ > 200°F

TOTAL ORGANIC CARBON (if liquid)

- ☒ ≤ 1%
☐ 1-5%
☐ ≥ 10%

BTU/LB

- ☒ < 2,000
☐ 2,000-5,000
☐ 5,000-10,000
☐ > 10,000

VAPOR PRESSURE (for liquids only)

mm Hg

654 344

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Fri, 16 2001 10:04AM P3

Page 2 of 3

Clean Harbors

Profile Number CH 179885

D. COMPOSITION (Must add up to at least 100%. Include inert materials and/or debris if applicable. Actual percentages range is acceptable.)

Sail / Pitt	0	- 100%	1,4-Dithian	2	7 ppm
Filter, dust mask, plastic	0	- 100%			
Crystalline, wood, other					
Thiodipylol	2	2 ppm			
1,4-Thiourac	2	2 ppm			

() Check if MSDS attached.

E. CONSTITUENTS — Attach any available analysis. Enter values or ranges where known. For TCLP values, list if rates below regulatory level. None, unknown, and present are also acceptable answers.

Are these values based on ☐ Knowledge or ☒ Testing?**INORGANIC**

PCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	OTHER METALS	TOTAL	NON-METALS	WT%
D004	ARSENIC	5.0	BCL		ALUMINUM	BCL	SULFUR	BCL
D005	BARIUM	100.0			ANTIMONY		BROMINE	
D006	CADMIUM	1.0			BERYLLIUM		CHLORINE	
D007	CHROMIUM	5.0			CALCIUM		FLUORINE	
D007	CHROMIUM CR+6				COPPER		IODINE	
D008	LEAD	5.0			MAGNESIUM			
D009	MERCURY	0.2			MOLYBDENUM			
D010	SELENIUM	1.0			NICKEL		AMMONIA	
D011	SILVER	5.0	BCL		POTASSIUM		REACTIVE SULFIDE	
					SILICON		CYANIDE-TOTAL	
					SODIUM		CYANIDE AMENABLE	
					THALLIUM		CYANIDE REACTIVE	
					TIN			
					VANADIUM			
					ZINC			

BCL = Below Regulatory limits

ORGANIC

VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	SEMI-VOLATILE ORGANICS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l
D018	BENZENE	0.5	BCL	D023	p-CRESOL	200.0	BCL
D019	CARBON TETRACHLORIDE	0.5		D024	m-CRESOL	200.0	
D021	CHLOROBENZENE	100.0		D025	p-CRESOL	200.0	
D022	CHLOROFORM	5.0		D026	CRESOL (TOTAL)	200.0	
D028	1,2-DICHLOROETHANE	0.5		D027	1,4-DICHLOROBENZENE	7.5	
D029	1,1-DICHLOROETHYLENE	0.7		D030	2,4-DINITROETHYLENE	0.13	
D035	METHYL ETHYL KETONE	200.0		D032	HEXACHLOROBENZENE	0.13	
D039	TETRACHLOROETHYLENE	0.7		D033	HEXACHLOROCYCLODIENE	0.5	
D040	TRICHLOROETHYLENE	0.5		D034	HEXACHLOROCYCLOHEXANE	3.0	
D043	VINYL CHLORIDE	0.2	BCL	D035	NITROBENZENE	2.0	
				D037	PENTACHLOROPHENOL	100.0	
				D038	PYRIDINE	5.0	
				D041	2,4,6-TRICHLOROPHENOL	400.0	
				D042	2,4,6-TRICHLOROPHENOL	2.0	BCL

PESTICIDES AND HERBICIDES

PESTICIDES AND HERBICIDES	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	OTHER
D012	ENDRIN	0.02	BCL	PHENOL
D013	LINDANE	0.4		TOTAL PETROLEUM HYDROCARBONS (SOILS ONLY)
D014	METHOXYCHLOR	10.0		PCBS
D015	TOXAPHENE	0.5		AT NONE
D016	2,4-D	10.0		<input type="checkbox"/> < 50 PPM
D017	2,4,5-TP (SILVEX)	1.0		<input type="checkbox"/> > 50 PPM
D020	CHLORDANE	0.03		IF PCBS ARE PRESENT
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.005	BCL	< 50 PPM, IS THE WASTE
				REGULATED BY TSCA
				40 CFR 761.1
				<input type="checkbox"/> YES <input type="checkbox"/> NO

OTHER HAZARDS

WATER REACTIVE	<input type="checkbox"/>	PESTICIDE	<input type="checkbox"/>	SHOCK SENSITIVE	<input type="checkbox"/>	DEA REGULATED SUBSTANCE	<input type="checkbox"/>
RADIOACTIVE	<input type="checkbox"/>	HERBICIDE	<input type="checkbox"/>	THERMALLY SENSITIVE	<input type="checkbox"/>	OXIDIZER	<input type="checkbox"/>
DIOXIN	<input type="checkbox"/>	EXPLOSIVE	<input type="checkbox"/>	INFECTIOUS, PATHOGENIC,	<input type="checkbox"/>	REDUCING AGENT	<input type="checkbox"/>
OSHA REGULATED	<input type="checkbox"/>	SPONTANEOUSLY	<input type="checkbox"/>	OR ETIOLOGICAL AGENT	<input type="checkbox"/>	NONE OF THE ABOVE	<input type="checkbox"/>
CARCINOGENS	<input type="checkbox"/>	IGNITES WITH AIR	<input type="checkbox"/>	ASBESTOS	<input type="checkbox"/>		

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED? YES ☐ NO ☒ (If yes, explain)

CHL 102

© CLEAN HARBORS CORP

654 345

FROM : CLEAN HARBORS

FRX NO. : 7813567484

R# 16 2881 18:05PM PM

Page 3 of 3



Profile Number CH 179885

F. REGULATORY STATUS

- ☒ **USEPA HAZARDOUS WASTE? (If Yes List codes)**
- ☒ **DO ANY GENERATOR STATE WASTE CODES APPLY? IF YES, LIST STATE CODES**
- ☐ **DO ANY FEDERAL OR STATE WASTE CODES WHICH MAY VARY FROM SHIPMENT TO SHIPMENT:**

WILL THE DECISION TO VARY THESE WASTE CODES BE BASED ON ☐ KNOWLEDGE OR ☐ TEST NO. (check one).
 IF KNOWLEDGE, DESCRIBE BASIS OF KNOWLEDGE:

- ☒ **IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?**
 THIS WASTE IS A: ☐ WASTEWATER ☐ NON WASTEWATER PER USEPA DEFINITION IN 40 CFR 268.2
- ☒ **IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D011, D012-D017 NON-WASTEWATERS, OR D018-D049 APPLY, ARE THERE ANY UNDERLYING HAZARDOUS CONSTITUENT (UHC'S) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?**
- ☒ **DOES TREATMENT OF THIS WASTE GENERATE A P006 OR P010 SLUDGE?**
- ☒ **IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?**
 IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401.
- ☒ **IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULE? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)**
- ☒ **DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS \geq 500 PPM?**
- ☒ **DOES THIS WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE \geq 20 KPa (1.04 psia)?**
- ☒ **DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2 psia)?**

G. DOT INFORMATION: List all shipping names that may be used. Attach additional page if necessary.

DOT SHIPPING NAME Non-Hazardous Waste Solid, Not For Recycling DOT HAZARD CLASS: None

UNNA: N/A PACKING GROUP (Circle 1) I II III HAZARD ZONE (Circle 1) A B C D

WILL THIS SHIPPING NAME VARY? ☐ YES ☒ NO IF YES, WILL ASSIGNMENT OF PROPER SHIPPING NAME BE BASED ON ☐ KNOWLEDGE OR ☐ TESTING? (check one) IF KNOWLEDGE, DESCRIBE BASIS OF KNOWLEDGE:

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY: ☐ ONE TIME ☐ WEEKLY ☐ SEMI-MONTHLY ☐ MONTHLY ☐ QUARTERLY ☐ OTHER☐ BULK LIQUID

GALLONS/SHIPMENT: _____ GAL

FROM TANK: TANK SIZE _____ GAL

FROM DRUMS

VEHICLE TYPE:

☐ VAC TRUCK

☐ TANK TRUCK

☐ RAILROAD TANK CAR

CHECK COMPATIBLE STORAGE MATERIALS:

☐ STEEL ☐ STAINLESS STEEL (316)

☐ RUBBER LINED ☐ FIBERGLASS LINED

☐ OTHER

☒ BULK SOLID

20 DRUMS PER SHIPMENT

STORAGE CAPACITY _____ TON/YD

VEHICLE TYPE:

☒ DUMP TRAILER

☒ ROLL OFF BOX

☐ INTERMODAL ROLLOFF BOX

☐ CUSCOVACTOR

☐ OTHER

☐ CONTAINERIZED

CONTAINERS/SHIPMENT

STORAGE CAPACITY: _____ CONTAINERS

CONTAINER TYPE:

☐ CUBIC YARD BOX

☐ PALLET

☐ TOTE TANK

DRUM SIZE:

CONTAINER MATERIAL:

☐ STEEL

☐ FIBER

☐ PLASTIC

☐ OTHER

I. SAMPLE STATUS

REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED ☐ YES ☒ NO SAMPLED BY _____ DATE SAMPLED _____

J. SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS:

SPECIAL WASTE HANDLING REQUIREMENTS: Incineration onlyOTHER COMMENTS OR REQUESTS: CECILE Site Incineration only

K. BIENNIAL ANNUAL REPORTING INFORMATION

SIC CODE _____ SOURCE CODE _____ FORM CODE _____ ORIGIN CODE _____

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Clean Harbors has the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE

Mike Ler

NAME (PRINT)

Mike Ler

TITLE

EPS/SM

DATE

10/18/2001

FOR CLEAN HARBORS USE ONLY

CH REPRESENTATIVE COMPLETING PROFILE:

CH 100

CLEAN HARBORS COPY

654 346

03/26/2001 MON 15:19 FAX 901 380 0485

WASTE MANAGEMENT

006

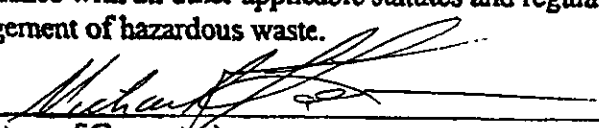
GENERATOR'S CERTIFICATION

I hereby certify on behalf of Memphis Depot Cartaker, DLA
(Company Name), (hereinafter for convenience called "Generator"), by my
signature and as a duly authorized representative of Generator, that the
attached is an analysis of and information regarding waste originating from
the Generator's facility located at 2163 Airways Blvd. Bld. 144
(Location). Memphis, TN 38114 (Dunn Field)

I further certify that the attached analysis and information is provided
in compliance with ADEM Administrative Code Rules 335-4-3-.08, and
that Chemical Waste Management has been duly authorized by the
Generator to submit the attached information, and this certification where
appropriate, in behalf of the Generator and in compliance with the
aforementioned regulation.

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

The Generator understands that any approval by the Department of
Environmental Management for disposal of any waste described by the
submitted information shall not relieve the Generator from liability for
compliance with all other applicable statutes and regulations regarding the
management of hazardous waste.


(Signature of Generator)

By: Michael E. Lee
(Print of type name)

Its: Environmental Specialist and Safety Manager
(Title of individual whose signature appears above)

Date: 04/16/2001
(Date on which this document is executed)

APPENDIX D

SHIPPING MANIFESTS

DRAFT

ROLLOFF (SITE 24-A) AND VCS POST OPERATION DEBRIS (SITE 24-B)

DRAFT

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No 02727		2. Page 1 4		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number							
4. Generator's Phone 901-544-0612						B. State Generator's ID							
5. Transporter 1 Company Name ACTION RESOURCES						6. US EPA ID Number ALR000007237		C. State Transporter's ID					
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 800-228-2815					
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 68145						10. US EPA ID Number NED081723513		E. State Transporter's ID					
								F. Transporter's Phone					
								G. State Facility's ID					
								H. Facility's Phone 800-262-0058					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit W/Vol		15. Waste No.	
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol ≤ 6 ppm, 1, 4-Dithiane ≤ 6 ppm)						No. 001 Type CM		00020		Y			
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above 11a: CH1901368 1,4 Dithiane ≤ 6ppm						K. Handling Codes for Wastes Listed Above M043/T07							
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4999 or DLA 800-851-8081, or Frank Johnson 703-625-3792, Need CD GG0401041													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee						Signature Michael Lee				Month Day Year 10/4/16/01			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Gene Billingsley						Signature Gene Billingsley				Month Day Year 10/4/16/01			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19													
Printed/Typed Name						Signature				Month Day Year			

ACTION RESOURCES, INC.

355 Co. Rd. 513 • Hanceville, AL 35077

Ph: (256) 352-2689 Fax: (256) 352-2687

BILL OF LADING

NO 18155

COLLECT AMOUNT
0 \$

SHIPPER UBX		LOADING CITY/STATE Memphis, TN		MANIFEST NO 02727	
CONSIGNEE		DESTINATION			
TRACTOR NO 241	TRAILER NO 378	BOX NO 459	DATE SHIPPED 4-16-01		
COMMODITY 1 BOX Don-Hug. Mats. cm			LOAD NO		
COMP NO 102876	UNIT cm	QUANTITY 20	QUANTITY		
			Gross	Tare	Net
LOADING TIME IN <u> </u> M. OUT <u> </u> M.			GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS		
UNLOADING TIME IN <u> </u> M. OUT <u> </u> M.			CARRIER PER [Signature]		
DETENTION RECORD			RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED		
AUTHORIZATION-LOADING DEMURRAGE			FIRM		
AUTHORIZATION-UNLOADING DEMURRAGE			BY [Signature] NAME AND SIGNATURE DELIVERY DATE		

ACTION RESOURCES, INC.

ROLL-OFF BOX # A 100 S/N 2317

TRACTOR # 240

DRIVER SIGNATURE Daniel Rush

PICK-UP INFORMATION

DATE: 4-16-01 TIME: _____ AM/PM

SHIPPER ABX

P/U CITY - ST. Memphis TN

SIGNATURE [Signature]

EMPTY ☐

LOADED ☒ MANIFEST # 02728

LOAD # _____

DELIVERY INFORMATION

DATE: _____

LOADED BOX:

Unloaded at _____

Drop Loaded at _____

Box returned to: _____

EMPTY BOX DELIVERED TO:

CONSIGNEE _____

CITY, ST _____

SIGNATURE _____

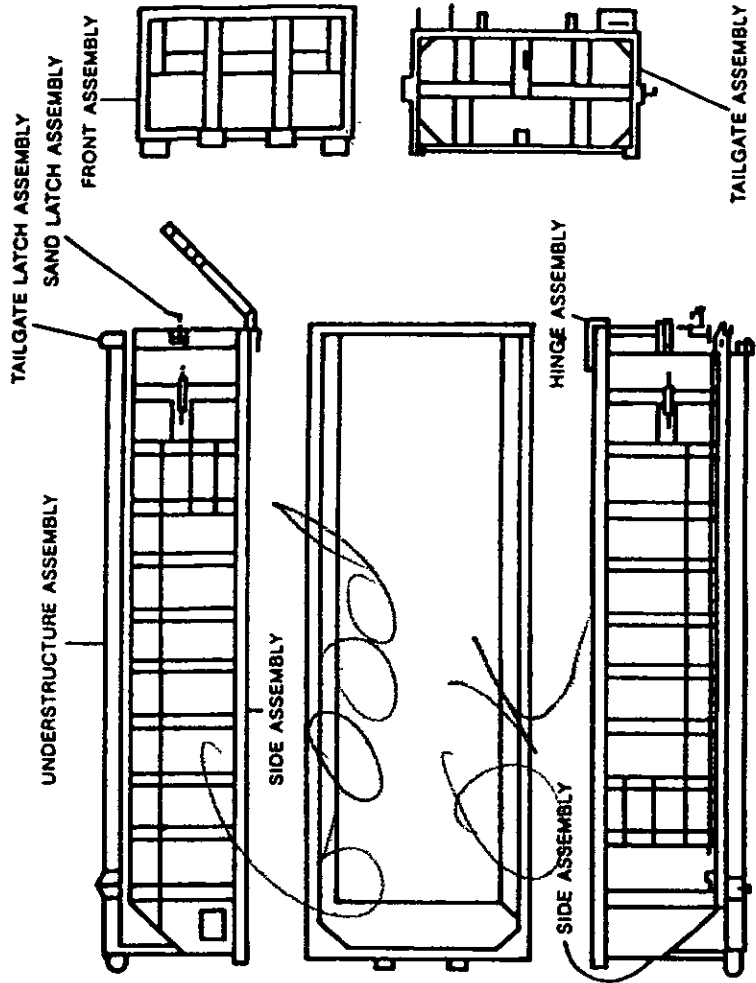
Indicate below any damage done to roll-off box by circling that portion on the drawing below.

Condition of Tarp: _____

Good

Condition of Bows: _____

No. Bows: 5



UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN4210020570		Manifest Document No 02720		2. Page 1 1		Information in the shaded areas is not required by Federal law									
3 Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number											
4. Generator's Phone 901-544-0612						B. State Generator's ID											
5. Transporter 1 Company Name Action Resources						C. State Transporter's ID											
6. US EPA ID Number ALR000007237						D. Transporter's Phone 800-228-8845											
7. Transporter 2 Company Name						E. State Transporter's ID											
8. US EPA ID Number						F. Transporter's Phone											
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 68145						G. State Facility's ID											
10. US EPA ID Number NED081723513						H. Facility's Phone 800-282-0058											
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12 Containers		13. Total Quantity		14. Unit Wt/Vol		Waste No.					
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol ≤ 6 ppm, 1, 4-Thioxane ≤ 6 ppm)						No 001		Type CM		00020		Y					
b.																	
c.																	
d.																	
J. Additional Descriptions for Materials Listed Above 11a: CH1001308 1,4-Dichloro ≤ 6 ppm						K. Handling Codes for Wastes Listed Above M043/T07											
15 Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4000 or DLA 800-851-8061, or Frank Johnson 703-625-3702, Need CD GG0401041																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee						Signature <i>Michael Lee</i>				Month Day Year 6/4/601							
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name SCOTT UPTON				Signature <i>Scott Upton</i>				Month Day Year 6/4/601			
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name				Signature				Month Day Year			
19. Discrepancy Indication Space																	
20 Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19																	
Printed/Typed Name						Signature				Month Day Year							

BILL OF LADING
17993

ACTION RESOURCES, INC.
355 Co. Rd. 513 • Hanceville, AL 35077
Ph. (256) 352-2689 Fax (256) 352-2687

COLLECT AMOUNT \$ 100.00	100.00
-----------------------------	--------

SHIPPER Nevada Army Depot / UX B		LOADING CITY/STATE Memphis, TN		MANIFEST NO. 03829	
CONSIGNEE Clear Harbor		DESTINATION Kia-land, NE			
TRACTOR NO.		TRAILER NO.		BOX NO.	
250		339		A 117	
COMMODITY		UNIT		QUANTITY	
1100 non hazardous wastes					
regulated wastes					
X					
DATE		DATE SHIPPED		LOAD NO.	
		9-16-01			
QUANTITY		Gross		Tons	
		Tons		Net	
		Tons			
GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS		SHIPPER PER		CARRIER PER	
AUTHORIZATION-LOADING DEMURRAGE		DETENTION RECORD		EXPLAIN TIME SPENT	
LOADING IN M		OUT M			
UNLOADING IN M		OUT M			
AUTHORIZATION-UNLOADING DEMURRAGE		FIRM		BY	
		SHOW COMPLETE COMPANY NAME AND SIGNATURE		DELIVERY DATE	

ACTION RESOURCES, INC.

ROLL-OFF BOX # AL17 S/N 8468

TRACTOR # 250

DRIVER SIGNATURE [Signature]

PICK-UP INFORMATION

DATE: 4-16-01 TIME: AM/PM

SHIPPER Memphis Army Depot / USB

P/U CITY - ST. Memphis, TN

SIGNATURE [Signature]

EMPTY ☐

LOADED ☒ MANIFEST # 02789

LOAD #

DELIVERY INFORMATION

DATE: 04/22/01

LOADED BOX:

Unloaded at

Drop Loaded at

Box returned to:

EMPTY BOX DELIVERED TO:

CONSIGNEE

CITY, ST

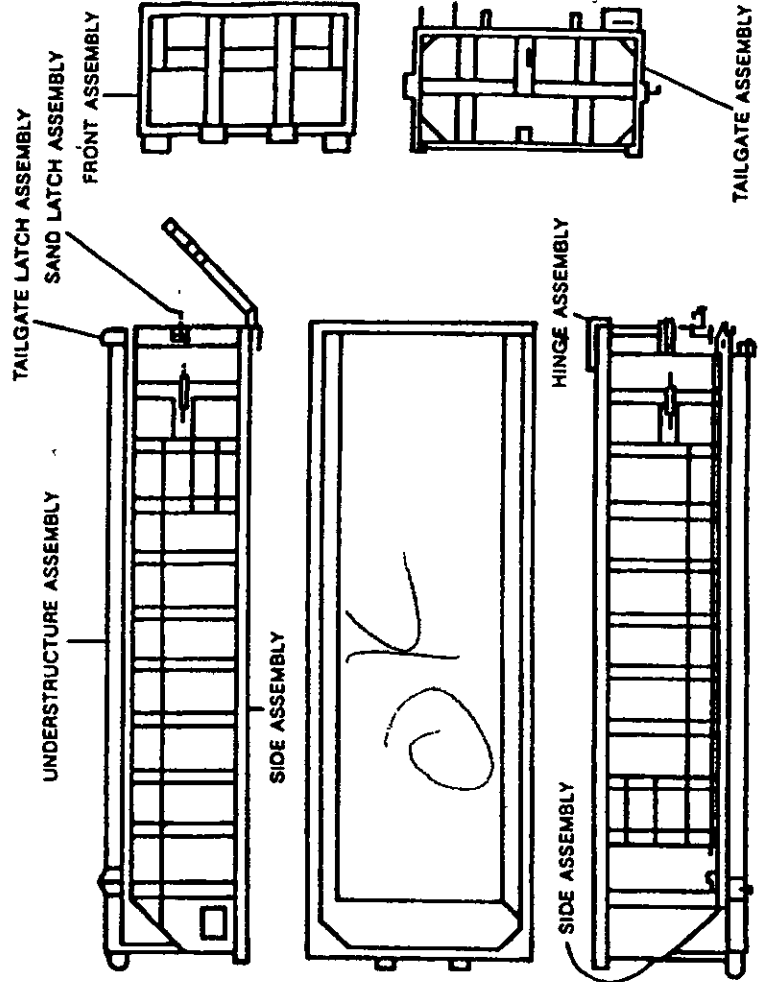
SIGNATURE

Indicate below any damage done to roll-off box by circling that portion on the drawing below.

Condition of Tarp: good

Condition of Bows: fair

No. Bows: 5



654 355

706

ase print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN210020570	Manifest Document No. 02728	2 Page 1 4	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA Memphis, TN, 38114				A. State/Manifest Document Number		
4. Generator's Phone 901-544-0812				B. State Generator's ID		
5. Transporter 1 Company Name Action Resources		6. US EPA ID Number IALR000007237		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 800-228-8845		
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 68145		10. US EPA ID Number NED081723513		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 800-282-0058		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol \leq 6 ppm, 1, 4-Thioxane \leq 6 ppm)				001	CM	Y
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above 11a: CH1901308 1,4 Dithane \leq 6ppm				K. Handling Codes for Wastes Listed Above M043/T07		
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4999 or DLA 800-851-8061, or Frank Johnson 703-625-3792, Need CD GG0401041						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee		Signature <i>Michael Lee</i>		Month Day Year 10/1/01		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name Darrell Rush		Signature <i>Darrell Rush</i>		Month Day Year 10/1/01		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		

BILL OF LADING
18158
ACTION RESOURCES, INC.
 355 Co. Rd. 513 • Hanceville, AL 35077
 Ph. (256) 352-2689 Fax (256) 352-2687

COLLECT AMOUNT
 D \$

SHIPPER <i>UBX</i>		LOADING CITY/STATE <i>Memphis TN</i>		MANIFEST NO. <i>02728</i>	
CONSIGNEE		DESTINATION <i>Chon Harbor NE</i>			
TRACTOR NO. <i>240</i>		TRAILER NO. <i>324</i>		DATE SHIPPED <i>5-16-01</i>	
COMMODITY <i>1-Box Ann Ha Mdrn</i>		BOX NO. <i>A100</i>		LOAD NO.	
COMP NO.	QUANTITY	UNIT	QUANTITY	QUANTITY	
				Gross	
				Tare	
				Net	
				Tons	

LOADING TIME	IN	M.	OUT	M.	AUTHORIZATION—LOADING DEMURRAGE
DETENTION RECORD — EXPLAIN TIME SPENT —					
UNLOADING TIME	IN	M.	OUT	M.	AUTHORIZATION—UNLOADING DEMURRAGE

GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS	
SHIPPER PER	
CARRIER PER	
RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED	
FIRM	
BY <small>SHOW COMPLETE COMPANY NAME AND SIGNATURE INITIALS NOT ACCEPTED</small>	
DELIVERY DATE	

ACTION RESOURCES, INC.

ROLL-OFF BOX # A 59 S/N 7863

TRACTOR # 241

DRIVER SIGNATURE [Signature]

PICK-UP INFORMATION

DATE: 4-16-01 TIME: AM/PM

SHIPPER UBX

P/U CITY - ST. Memphis, TN

SIGNATURE [Signature]

EMPTY ☐

LOADED ☒ MANIFEST # 02727

LOAD #

DELIVERY INFORMATION

DATE:

LOADED BOX:

Unloaded at

Drop Loaded at

Box returned to:

EMPTY BOX DELIVERED TO:

CONSIGNEE

CITY, ST

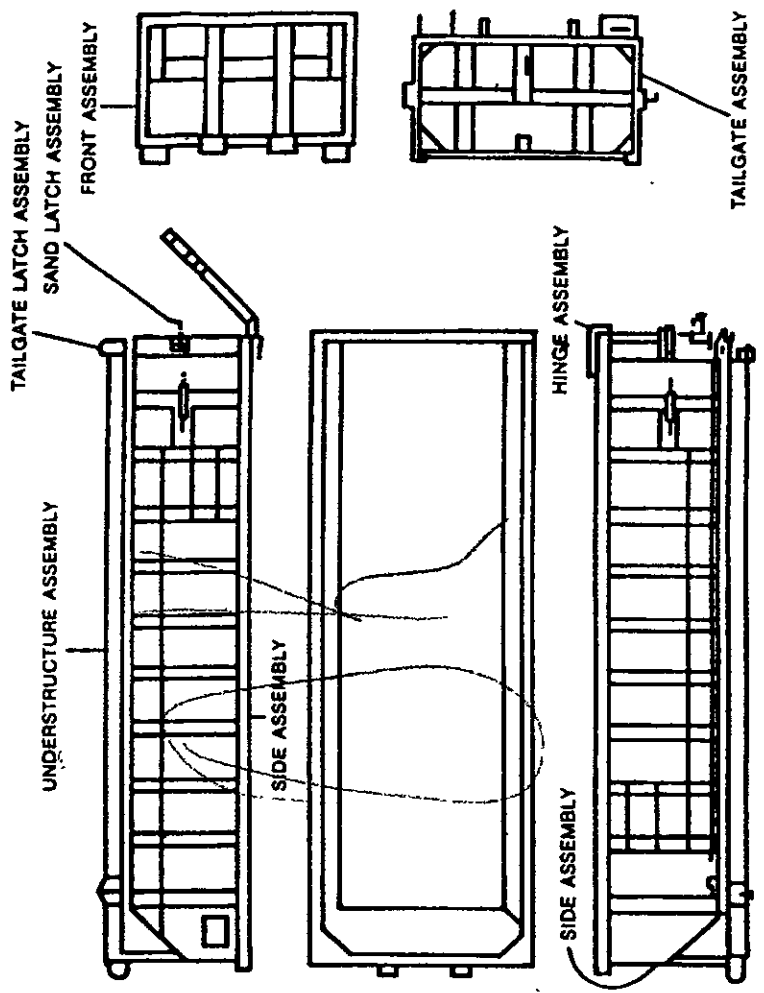
SIGNATURE

Indicate below any damage done to roll-off box by circling that portion on the drawing below.

Condition of Tarp: Good

Condition of Bows: Good

No. Bows: 5



UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN4210020570		Manifest Document No 02731		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number							
4. Generator's Phone 901-544-0812						B. State Generator's ID							
5. Transporter 1 Company Name ACTION Resources, INC						C. State Transporter's ID							
6. US EPA ID Number ALR000007237						D. Transporter's Phone 256-352-2689							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 69145						G. State Facility's ID							
10. US EPA ID Number NED081723513						H. Facility's Phone 800-282-0058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12 Containers No.		13. Total Quantity		14. Unit Wt/Vol		Waste No.	
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol ≤ 8 ppm, 1, 4-Thioxane ≤ 8 ppm)						001		000.20		Y			
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above 11a. CH1001388 1/4 Diesel ≤ 8ppm						K. Handling Codes for Wastes Listed Above M043/T07							
15 Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4998 or DLA 800-851-8081, or Frank Johnson 703-625-3782, Need CD													
Box A93 GG0401041													
16. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee						Signature <i>Michael Lee</i>						Month Day Year 04/16/01	
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Jim Robertson						Signature <i>Jim Robertson</i>						Month Day Year 04/16/01	
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature						Month Day Year	
19. Discrepancy Indication Space													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19													
Printed/Typed Name						Signature						Month Day Year	

No. 13931
 BILL OF LADING

ACTION RESOURCES, INC.
355 Co. Rd. 513 • Hanceville, AL 35077
Ph. (256) 352-2689 Fax (256) 352-2689

COLLECT AMOUNT	\$	
----------------	----	--

SHIPPER		MEMPHIS ARMY DEPOT / UXB		LOADING CITY/STATE		MEMPHIS, TN		MANIFEST NO.		02731	
CONSIGNEE		Clean Harbor		DESTINATION		KIMBALLY NE		DATE SHIPPED		4-16-01	
TRACTOR NO.		249		TRAILER NO.		340		BOX NO.		A93	
COMMODITY		1 BOX NON-HAZ SOLID WASTE		UNIT		CM 20		QUANTITY			
COMP NO.		LOADING		UNIT		QUANTITY		QUANTITY			
								Gross			
								Tare			
								Net			
								Tons			

GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS

SHIPPER PER *[Signature]*

CARRIER PER *[Signature]*

RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED

FIRM

BY *[Signature]* INITIALS AND NAME

RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED

FIRM

LOADING IN M. OUT M.

TIME

AUTHORIZATION—LOADING DEMURRAGE

DETENTION RECORD ----- EXPLAIN TIME SPENT -----

UNLOADING IN M. OUT M.

TIME

AUTHORIZATION—UNLOADING DEMURRAGE

ACTION RESOURCES, INC.

ROLL-OFF BOX # A 93 S/N 2390
TRACTOR # 247
DRIVER SIGNATURE [Signature]

PICK-UP INFORMATION

DATE: 4-16-01 TIME: AM/PM
SHIPPER MEMPHIS ARMY DEPOT / UXA
P/U CITY - ST. MEMPHIS, TN
SIGNATURE [Signature]
EMPTY ☐
LOADED ☒ MANIFEST # 62731

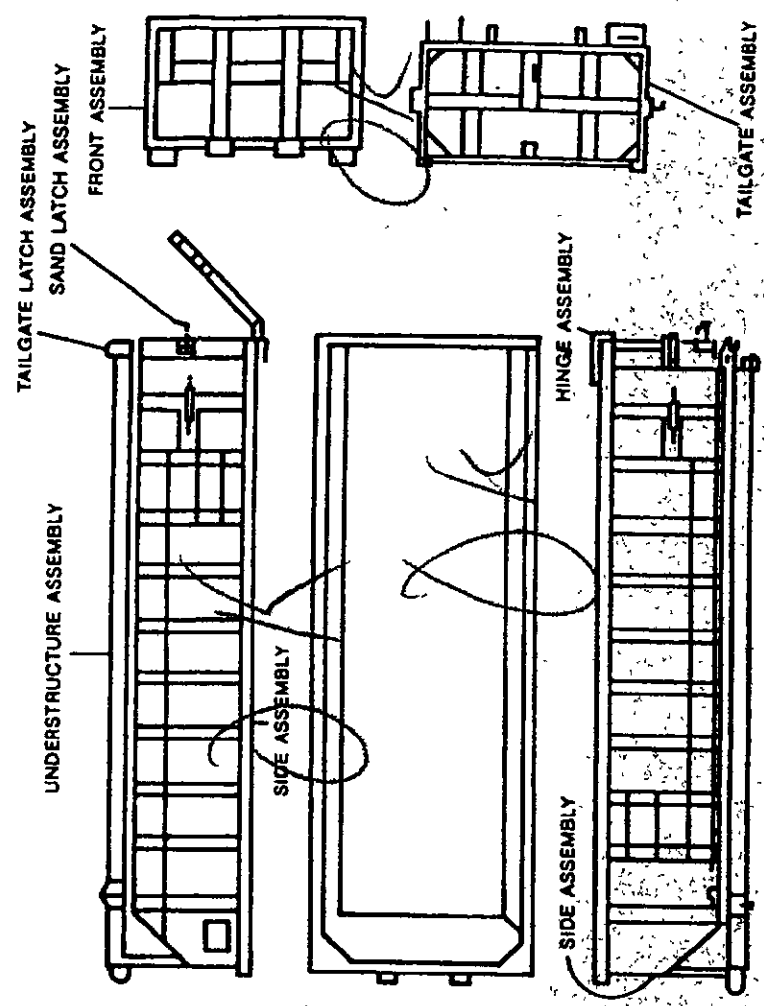
DELIVERY INFORMATION

DATE: _____
LOADED BOX:
Unloaded at _____
Drop Loaded at _____
Box returned to: _____
EMPTY BOX DELIVERED TO:
CONSIGNEE _____
CITY, ST _____
SIGNATURE _____

LOAD # _____

Indicate below any damage done to roll-off box by circling that portion on the drawing below.

Condition of Tarp: OK
Condition of Bows: OK
No. Bows: 6



654 361

TRUCK #263 BOX #4111

7011

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN4210020570		Manifest Document No 02730		2 Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address 2163 Airways Blvd. Memphis Depot Caretaker DLA Memphis, TN, 38114						A. State Manifest Document Number							
4. Generator's Phone 901-544-0812						B. State Generator's ID							
5. Transporter 1 Company Name Action Resource						C. State Transporter's ID							
6. US EPA ID Number 1000000007237						D. Transporter's Phone 800228-876							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 69145						G. State Facility's ID							
10. US EPA ID Number NED881723513						H. Facility's Phone 800-282-0058							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol ≤ 6 ppm, 1, 4-Thioxane ≤ 6 ppm)						No. Type				Y			
b.													
c.													
d.													
Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
11a: CH1901388 1,4 Dioxane ≤ 4 ppm						M043/T07							
15. Special Handling Instructions and Additional Information													
24 Hour Emergency Contact: Mike Lee 801-745-4999 or DLA 800-851-8081, or Frank Johnson 703-825-3792, Need CO										GG0401041			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations													
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 Michael Lee						Signature Michael Lee				Month Day Year 6/4/60/1			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Bobby Eustice						Signature Bobby Eustice				Month Day Year 10/9/16/01			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name						Signature				Month Day Year			



BILL OF LADING

ACTION RESOURCES, INC.

355 Co. Rd. 513 • Hanceville, AL 35077

Ph. (256) 352-2689

COLLECT AMOUNT
\$ 8.50

NO 10488

SHIPPER <i>UAB Memphis Direct</i>		LOADING CITY/STATE <i>Memphis TN</i>		MANIFEST NO <i>02730</i>	
CONSIGNEE <i>Clear Harbor</i>		DESTINATION <i>Kimball NE</i>			
TRACTOR NO <i>263</i>		TRAILER NO. <i>379</i>		DATE SHIPPED <i>4-16-01</i>	
COMMODITY <i>hood Hay waste</i>		BOX NO <i>A 111</i>		LOAD NO.	
COMP NO	QUANTITY	UNIT	QUANTITY	QUANTITY	
1	1	CM	20	Gross	
				Tons	
				Net	
				Tons	

LOADING TIME IN _____ M. OUT _____ M.		AUTHORIZATION—LOADING DEMURRAGE <i>[Signature]</i>		GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS	
UNLOADING TIME IN _____ M. OUT _____ M.		AUTHORIZATION—UNLOADING DEMURRAGE		CARRIER PER <i>[Signature]</i>	
DETENTION RECORD ——— EXPLAIN TIME SPENT ———				RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED	
				FIRM	
				BY <i>[Signature]</i>	
				SHOW COMPLETE COMPANY NAME AND SIGNATURE DELIVERY DATE INITIALS NOT RECEIVED	

ACTION RESOURCES, INC.

ROLL-OFF BOX # 4111 S/N 46328

TRACTOR # 263

DRIVER SIGNATURE Bobby Carter

PICK-UP INFORMATION

DATE: 4-16-01 TIME: _____ AM/PM

SHIPPER: UAB Memphis, Tenn

P/U CITY - ST. Memphis, Tenn

SIGNATURE [Signature]

EMPTY ☐

LOADED ☒ MANIFEST # 02730

LOAD # _____

DELIVERY INFORMATION

DATE: _____

LOADED BOX:

Unloaded at _____

Drop Loaded at _____

Box returned to: _____

EMPTY BOX DELIVERED TO:

CONSIGNEE _____

CITY, ST _____

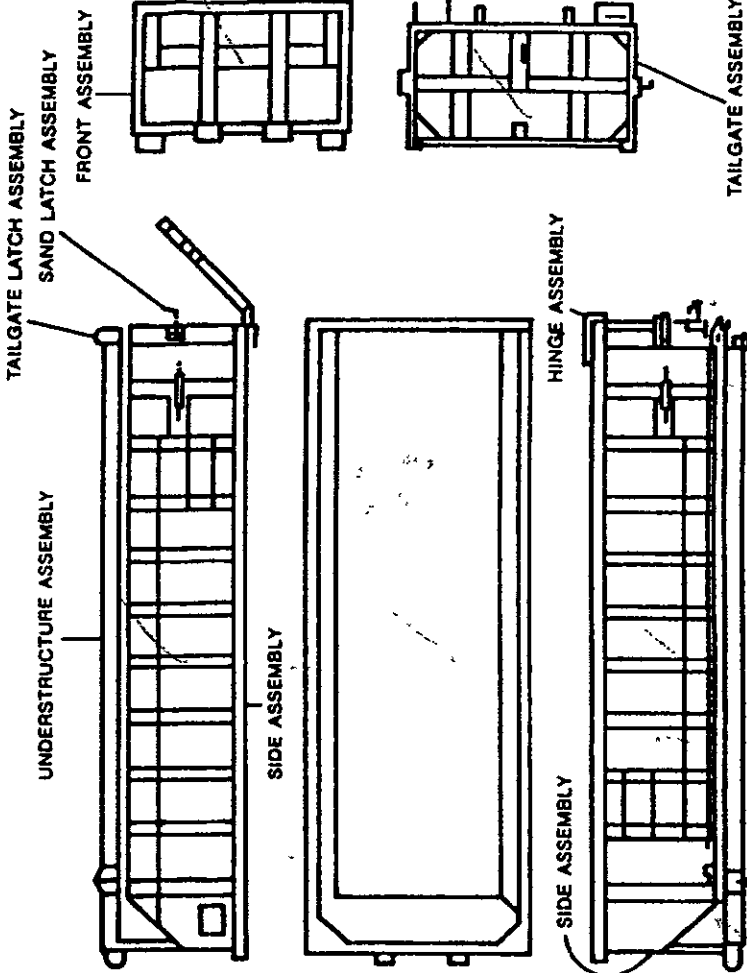
SIGNATURE _____

Indicate below any damage done to roll-off box by circling that portion on the drawing below.

Condition of Tarp: _____

Condition of Bows: _____

No. Bows: _____



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No 02732		2. Page 1 of 1		Information in the shaded areas is not required by Federal law									
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA Memphis, TN, 38114						A. State Manifest Document Number											
4. Generator's Phone 801-544-0812						B. State Generator's ID											
5. Transporter 1 Company Name Robbie D. Wood						C. State Transporter's ID											
6. US EPA ID Number ALD062138891						D. Transporter's Phone 1-800-356-7457											
7. Transporter 2 Company Name						E. State Transporter's ID											
8. US EPA ID Number						F. Transporter's Phone											
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 68145						G. State Facility's ID											
10. US EPA ID Number NED081723513						H. Facility's Phone 800-282-0953											
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.					
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol ≤ 6 ppm, 1, 4-Thioxane ≤ 6 ppm)						No. 001 Type CM		0.0020		Y							
b.																	
c.																	
d.																	
J. Additional Descriptions for Materials Listed Above 11a. CH1001308 1/4 Dibenz ≤ 6ppm						K. Handling Codes for Wastes Listed Above 14043/T07											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4999 or DLA 800-851-8061, or Frank Johnson 703-825-3782, Need CD GG0401041																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee						Signature Michael Lee				Month Day Year 01/16/01							
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Wanda Wilson				Signature Wanda Wilson				Month Day Year 01/16/01			
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name				Signature				Month Day Year			
19. Discrepancy Indication Space																	
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																	
Printed/Typed Name						Signature				Month Day Year							



ROBBIE D. WOOD, INC.

ROLL-OFF BOX # 0413 S/N

TRACTOR # 10030

DRIVER SIGNATURE [Signature]

PICK-UP INFORMATION

DATE: 1-10-01 TIME: 10:00 AM/PM

SHIPPER Merchandise

P/U CITY - ST. Memphis TN

SIGNATURE [Signature]

EMPTY ☐

LOADED ☒

MANIFEST # 000130

DRIVERS: WHEN FILLING OUT THIS FORM, WRITE ON
HARD SURFACE. PRESS FIRMLY WITH BALL-POINT PEN.

LOAD #

DELIVERY INFORMATION

DATE:

LOADED BOX:

Unloaded at

Drop Loaded at

Box returned to:

EMPTY BOX DELIVERED TO:

CONSIGNEE

CITY, ST

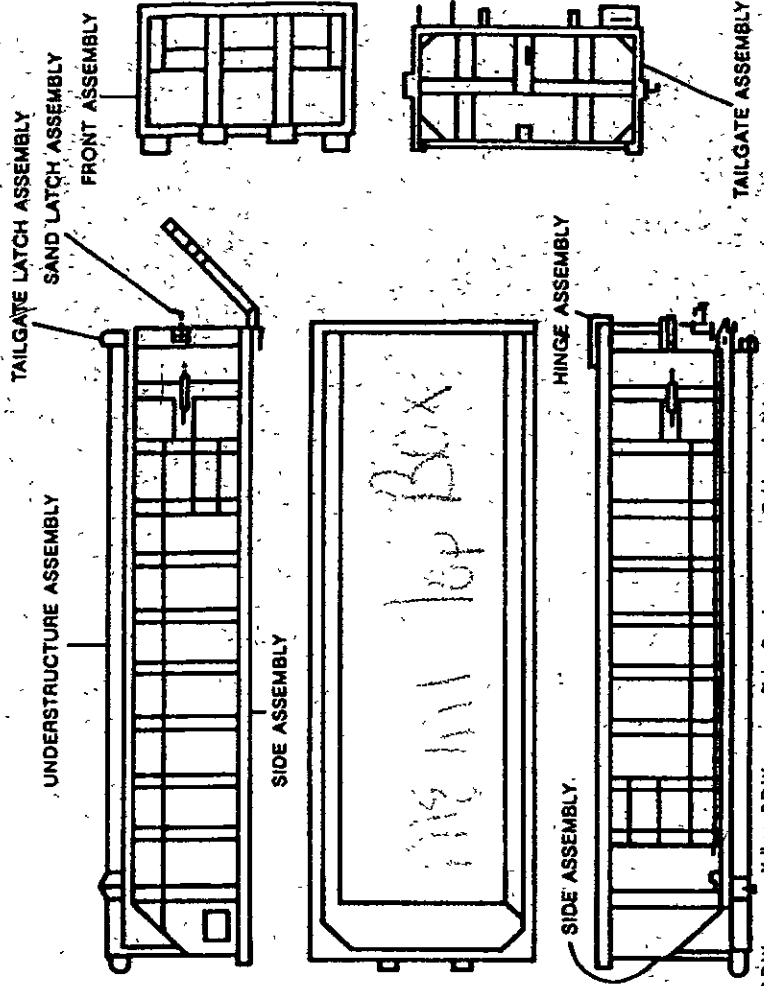
SIGNATURE

Indicate below any damage
done to roll-off box by
circling that portion on the
drawing below.

Condition of Tarp: _____

Condition of Bows: _____

No. Bows: _____



UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No IN4210020570		Manifest Document No. 02738		2. Page 1 d		Information in the shaded areas is not required by Federal law.					
3 Generator's Name and Mailing Address Memphis Depot Caretaker 2103 Airways Blvd. Memphis, TN 38114						A. State Manifest Document Number							
4 Generator's Phone 901-544-0937						B. State Generator's ID							
5 Transporter 1 Company Name				6 US EPA ID Number		C. State Transporter's ID							
7 Transporter 2 Company Name				8 US EPA ID Number		D. Transporter's Phone 800-212-5465							
9 Designated Facility Name and Site Address Clean Harbors Kimball Incineration Pl 2247 South Hwy 71, Kimball, NE, 69145				10. US EPA ID Number NED981723513		E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone 800-282-0069							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						No Type							
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol ≤ 0 ppm, 1, 4-Thioxane ≤ 6 ppm)						CM				Y			
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above 11a. CH1001308 1,4-Dioxane ≤ 6 ppm						K. Handling Codes for Wastes Listed Above M043/T07							
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 801-745-4999 or DLA 800-851-3061, or Frank Johnson 703-625-3792, Need CD GG0401041													
16. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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						Signature				Month Day Year			
										10/4/80			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
SCOTT LUTON										10/4/80			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19													
Printed/Typed Name						Signature				Month Day Year			

ACTION RESOURCES, INC.

355 Co. Rd. 513 • Hanceville, AL 35077

Ph. (256) 352-2689

Fax (256) 352-2687

BILL OF LADING

17994

COLLECT AMOUNT
\$

SHIPPER		LOADING CITY/STATE		MANIFEST NO 02738											
CONSIGNEE		DESTINATION													
		TRACTOR NO	TRAILER NO	BOX NO	DATE SHIPPED 4-5-01										
			37	RB26801	LOAD NO										
COMP NO	LOADING TERM NO	COMMODITY		UNIT	QUANTITY										
		1 load van Hazardous Waste		CM	20 yd.										
		<table border="1"> <tr> <th colspan="2">QUANTITY</th> </tr> <tr> <td></td> <td>Gross</td> </tr> <tr> <td></td> <td>Tare</td> </tr> <tr> <td></td> <td>Net</td> </tr> <tr> <td></td> <td>Tons</td> </tr> </table>				QUANTITY			Gross		Tare		Net		Tons
QUANTITY															
	Gross														
	Tare														
	Net														
	Tons														
LOADING TIME		IN M. OUT M.		AUTHORIZATION—LOADING DEMURRAGE											
				DETENTION RECORD ——— EXPLAIN TIME SPENT											
UNLOADING TIME		IN M. OUT M.		AUTHORIZATION—UNLOADING DEMURRAGE											
				GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS SHIPPER PER <i>[Signature]</i> CARRIER PER <i>[Signature]</i> RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED FIRM _____ BY _____ SHOW COMPLETE COMPANY NAME AND SIGNATURE INITIALS NOT ACCEPTED DELIVERY DATE _____											

ACTION RESOURCES, INC.ROLL-OFF BOX # R32601 S/N 2886TRACTOR # 2512DRIVER SIGNATURE [Signature]

654 368

LOAD # _____

DELIVERY INFORMATION

DATE: _____

LOADED BOX:

Unloaded at _____

Drop Loaded at _____

Box returned to: _____

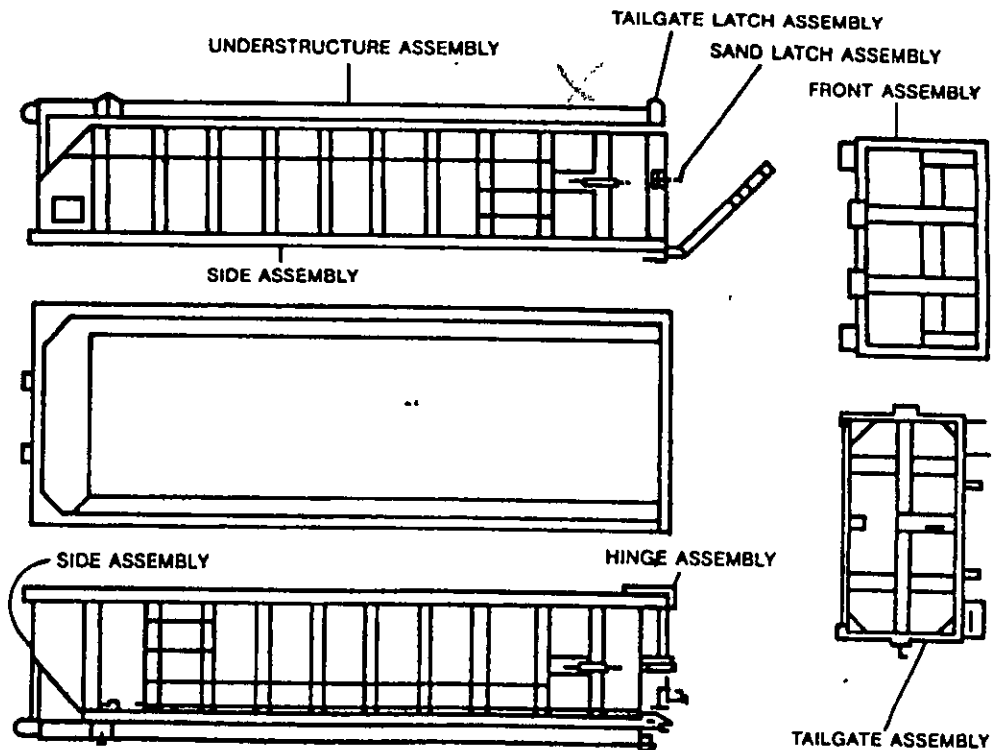
EMPTY BOX DELIVERED TO:CONSIGNEE [Signature]

CITY, ST _____

SIGNATURE _____

PICK-UP INFORMATIONDATE: 11/1/01 TIME: _____ AM/PMSHIPPER [Signature]P/U CITY - ST. Wilmington, DESIGNATURE [Signature]EMPTY ☐LOADED ☒ MANIFEST # 02838

Indicate below any damage
done to roll-off box by
circling that portion on the
drawing below.

Condition of Tarp: goodCondition of Bows: fairNo. Bows: 6

654 369

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No. 02737		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Caretaker 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number			
4. Generator's Phone 901-544-0812						B. State Generator's ID			
5. Transporter 1 Company Name RESCUE						6. US EPA ID Number 11-110907237		C. State Transporter's ID	
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 800-282-0015	
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 69145						10. US EPA ID Number NED881723513		E. State Facility's ID	
								F. Facility's Phone 800-282-0015	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	
						No. Type		Unit Wt/Vol	
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol < 6 ppm, 1, 4-Thioxane < 6 ppm)								Y	
b.									
c.									
d.									
14. Additional Descriptions of Materials Listed Above 11a: CH1001308 1,4-Dioxane < 6ppm						15. Handling Codes for Wastes Listed Above M043/T07			
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4899 or DLA 800-851-3081, or Frank Johnson 703-625-3792, Need CD GG0401041									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee						Signature Michael Lee		Month Day Year 10/1/80	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name Billingsley						Signature Billingsley		Month Day Year 10/1/80	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name						Signature		Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name						Signature		Month Day Year	

ACTION RESOURCES, INC.
355 Co. Rd. 513 • Hanceville, AL 35077
Ph. (256) 352-2689 Fax (256) 352-2687

BILL OF LADING

654 370 16352

COLLECT AMOUNT
D \$

SHIPPER <i>UXB</i>		LOADING CITY/STATE <i>Memphis, TN</i>		MANIFEST NO. <i>02737</i>	
CONSIGNEE <i>Clean Harbor</i>		DESTINATION <i>Kimball NE</i>			
		TRACTOR NO <i>241</i>	TRAILER NO <i>378</i>	BOX NO <i>A 58</i>	DATE SHIPPED <i>4-18-01</i>
					LOAD NO
COMP NO	LOADING TERM	COMMODITY		UNIT	QUANTITY
		<i>1 Box Non Hazard waste</i>		<i>cm</i>	<i>20</i>
LOADING TIME		IN	M.	GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS	
		OUT	M.	SHIPPER PER	
		AUTHORIZATION—LOADING DEMURRAGE		CARRIER PER	
		DETENTION RECORD		EXPLAIN TIME SPENT	
UNLOADING TIME		IN	M.	RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED	
		OUT	M.	FIRM	
		AUTHORIZATION—UNLOADING DEMURRAGE		BY	
				SHOW COMPLETE COMPANY NAME AND SIGNATURE, DELIVERY DATE	
				INITIALS NOT ACCEPTED	

ACTION RESOURCES, INC.

654 37

R017

LOAD # _____

ROLL-OFF BOX # A 58 S/N 7922

TRACTOR # 241

DRIVER SIGNATURE [Signature]

PICK-UP INFORMATION

DATE: 11-18-01 TIME: _____ AM/PM

SHIPPER UXB

P/U CITY - ST. Memphis, TN

SIGNATURE [Signature]

EMPTY ☐

LOADED ☒ MANIFEST # 02737

DELIVERY INFORMATION

DATE: _____

LOADED BOX:

Unloaded at _____

Drop Loaded at _____

Box returned to: _____

EMPTY BOX DELIVERED TO:

CONSIGNEE _____

CITY, ST _____

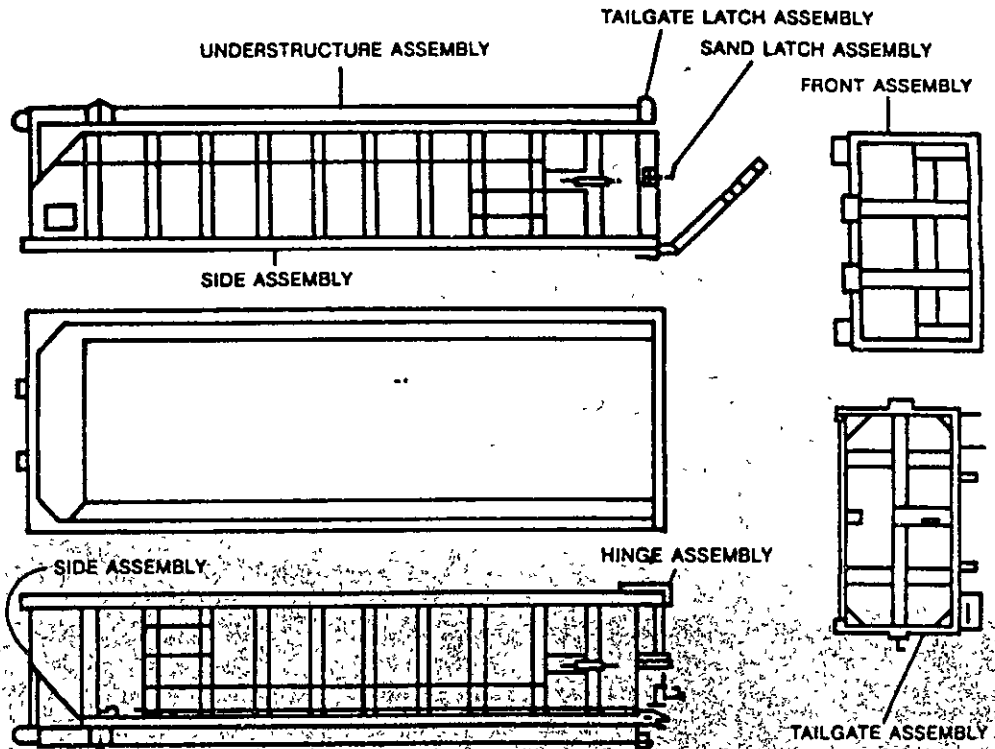
SIGNATURE _____

Indicate below any damage done to roll-off box by circling that portion on the drawing below.

Condition of Tarp: good

Condition of Bows: 5
good

No. Bows: 5



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570	Manifest Document No. 02734	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Caretaker 2163 Airways Blvd. Memphis, TN, 38114			A. State Manifest Document Number		
4. Generator's Phone 901-544-0017			B. State Generator's ID		
5. Transporter 1 Company Name			C. State Transporter's ID		
6. US EPA ID Number			D. Transporter's Phone		
7. Transporter 2 Company Name			E. State Transporter's ID		
8. US EPA ID Number			F. Transporter's Phone		
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Pl 2247 South Hwy 71, Kimball, NE, 68145			G. State Facility's ID		
10. US EPA ID Number NED081723513			H. Facility's Phone 800-252-0058		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste ID
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Triethylol < 6 ppm, 1, 4-Thioxane < 6 ppm)		001	00020	Y	
b.					
c.					
d.					
16. Additional Descriptions for Materials Listed Above 11a: CH1001368 1, 4-Dioxane < 6ppm		Key Handling Codes for Wastes Listed Above 11a: 3T07			
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4990 or DLA 800-851-8081, or Frank Johnson 703-626-3792, Need CD GG0401041					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee		Signature Michael Lee		Month Day Year 01/14/84	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Michael P. Yeager		Signature Michael P. Yeager		Month Day Year 01/14/84	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name					
Signature		Month Day Year			



654 373
ROBBIE D. WOOD, INC.

DRIVERS: WHEN FILLING OUT THIS FORM, WRITE ON
HARD SURFACE. PRESS FIRMLY WITH BALL-POINT PEN.

ROLL-OFF BOX # A76 S/N 2782
TRACTOR # 173
DRIVER SIGNATURE [Signature]

LOAD # _____

PICK-UP INFORMATION

DATE: _____ TIME: _____ AM/PM

SHIPPER Memphis Depot & Linetank

P/U CITY - ST. Memphis, TN

SIGNATURE [Signature]

EMPTY ☐

LOADED ☒ MANIFEST # 02734

DELIVERY INFORMATION

DATE: _____

LOADED BOX:

Unloaded at _____

Drop Loaded at _____

Box returned to: _____

EMPTY BOX DELIVERED TO:

CONSIGNEE _____

CITY, ST _____

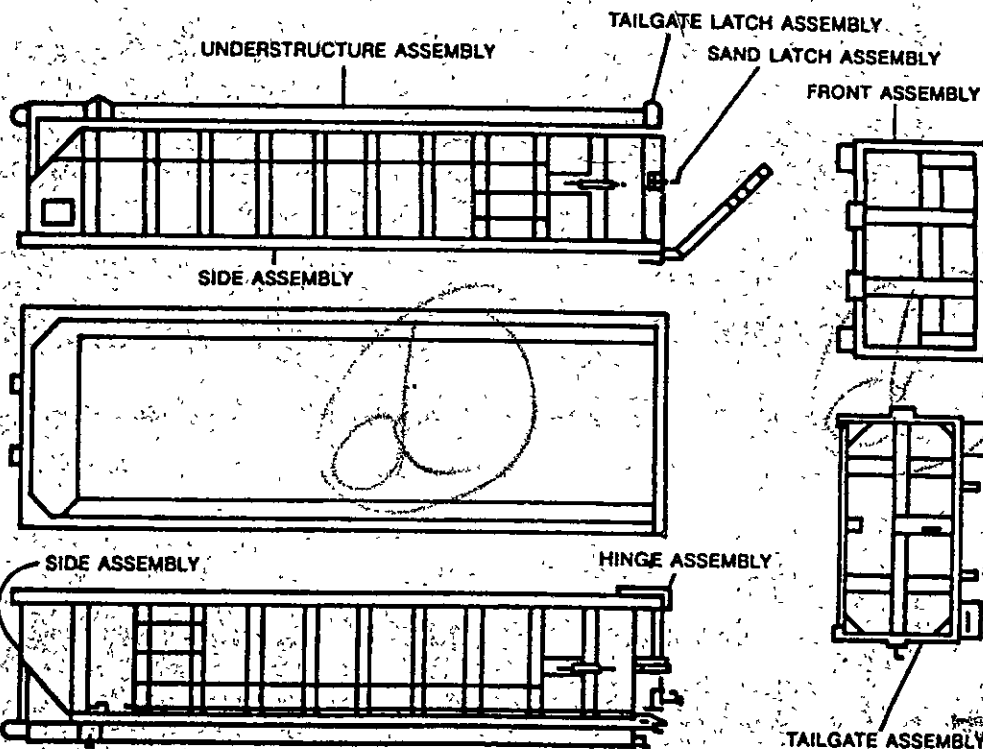
SIGNATURE _____

Indicate below any damage
done to roll-off box by
circling that portion on the
drawing below.

Condition of Tarp: _____

Condition of Bows: _____

No. Bows: _____



Form 373 Eaton Printing 426-2647

White - R.D.W. Yellow - R.D.W. Pink - Consignee Goldenrod - Shipper

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570	Manifest Document No. 02736	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Caretaker 2163 Airways Blvd Memphis, TN, 38114				A. State Manifest Document Number		
4. Generator's Phone 901-544-0812				B. State Generator's ID		
5. Transporter 1 Company Name		6. US EPA ID Number		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone		
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Pl 2247 South Hwy 71, Kimball, NE, 68145		10. US EPA ID Number NED081723513		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 800-282-0068		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers	13. Total Quantity	14. Unit Wt/Vol
				No.	Type	Waste No.
a.	Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiglycol ≤ 8 ppm, 1, 4-Thioxane ≤ 8 ppm)				CM	Y
b.						
c.						
d.						
J. Additional Descriptions of Materials Listed Above				K. Handling Codes for Wastes Listed Above		
11a. CH1001369 1,4-Dioxane ≤ 6 ppm				MDX3107		
15. Special Handling Instructions and Additional Information						
24 Hour Emergency Contact: Mike Lee 801-745-4888 or DLA 800-851-8081, or Frank Johnson 703-825-3702, Need CD						
GG0401041						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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				Signature		Month Day Year
Mike Lee				<i>Mike Lee</i>		11/1/01
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature		Month Day Year
Printed/Typed Name				Signature		Month Day Year
Daniel R. Lee				<i>Daniel R. Lee</i>		11/1/01
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Month Day Year
Printed/Typed Name				Signature		Month Day Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name				Signature		Month Day Year

654 375

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of	Information in the shaded areas is not required by Federal law
3 Generator's Name and Mailing Address				A State Manifest Document Number	
4 Generator's Phone ()				B State Generator's ID	
5 Transporter 1 Company Name		6 US EPA ID Number	C State Transporter's ID		
7 Transporter 2 Company Name		8 US EPA ID Number	D Transporter's Phone		
9 Designated Facility Name and Site Address		10 US EPA ID Number	E State Transporter's ID		
11 US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12 Containers		13 Total Quantity	14 Unit Wt/Vol
		No. Type			Waste No.
a. Non RCRA Hazardous Waste Solution (X) 1 Regulated (Theobromine = 5 ppm 1 4 Theobromine = 8 ppm)					
b.					
c.					
d.					
J Additional Descriptions for Materials Listed Above				K Handling Codes for Wastes Listed Above	
11a CH190136B 1,4 Dichloro-5,6 ppm				M043/T07	
15. Special Handling Instructions and Additional Information					
24 Hour emergency contact Mike Lee 401 745 4998 or DLA 600 254 6081 or Frank					
16 GENERATOR'S CERTIFICATION I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations					
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		Signature		Month Day Year	
17 Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
18 Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19 Discrepancy Indication Space					
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19					
Printed/Typed Name		Signature		Month Day Year	



ACTION RESOURCES, INC.

ROLL-OFF BOX # A105 S/N 946
TRACTOR # 240
DRIVER SIGNATURE [Signature]

R016

654 376

LOAD # _____

DELIVERY INFORMATION

DATE: _____

LOADED BOX:

Unloaded at _____

Drop Loaded at _____

Box returned to: _____

EMPTY BOX DELIVERED TO:

CONSIGNEE _____

CITY, ST _____

SIGNATURE _____

PICK-UP INFORMATION

DATE: 4-18-01 TIME: _____ AM/PM

SHIPPER _____

P/U CITY - ST. Memphis TN

SIGNATURE [Signature]

EMPTY ☐

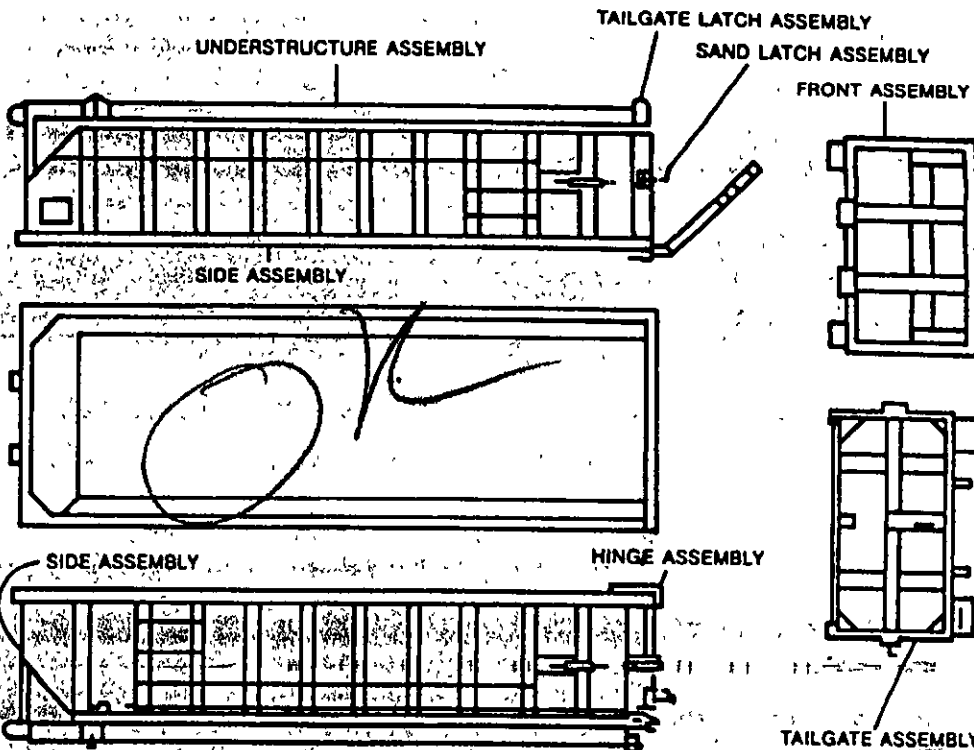
LOADED ☒ MANIFEST # 02736

Indicate below any damage done to roll-off box by circling that portion on the drawing below.

Condition of Tarp: OK

Condition of Bows: OK

No. Bows: 5



654 377

R016

ACTION RESOURCES, INC.

355 Co. Rd. 513 • Hanceville, AL 35077
Ph. (256) 352-2689 Fax (256) 352-2687

BILL OF LADING

18 58

COLLECT AMOUNT
O D \$

SHIPPER		LOADING CITY/STATE		MANIFEST NO	
CONSIGNEE		DESTINATION			
TRACTOR NO		TRAILER NO		BOX NO	
				DATE SHIPPED	
				LOAD NO	
COMP NO	LOADING TERMS	COMMODITY		UNIT	QUANTITY
		1 - Box New Haze Soil		CM	20
LOADING TIME		IN	OUT	M	M
		AUTHORIZATION—LOADING DEMURRAGE			
		DETENTION RECORD ——— EXPLAIN TIME SPENT ———			
UNLOADING TIME		IN	OUT	M	M
		AUTHORIZATION—UNLOADING DEMURRAGE			
GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS					
SHIPPER PER					
CARRIER PER Action Resources					
RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED					
FIRM CLEAN Harbors					
BY SHOW COMPLETE COMPANY NAME AND SIGNATURE INITIALS NOT ACCEPTED DELIVERY DATE					

ACTION RESOURCES, INC.

R014

654 378

ROLL-OFF BOX # RL25403 S/N 1111-1
 TRACTOR # 211
 DRIVER SIGNATURE [Signature]

LOAD # _____

PICK-UP INFORMATION

DATE: _____ TIME: _____ AM/PM

SHIPPER Memphis Area District, USA

P/U CITY - ST. Memphis, TN

SIGNATURE [Signature]

EMPTY ☐

LOADED ☒ MANIFEST # C2735

DELIVERY INFORMATION

DATE: _____

LOADED BOX:

Unloaded at _____

Drop Loaded at _____

Box returned to: _____

EMPTY BOX DELIVERED TO:

CONSIGNEE _____

CITY, ST _____

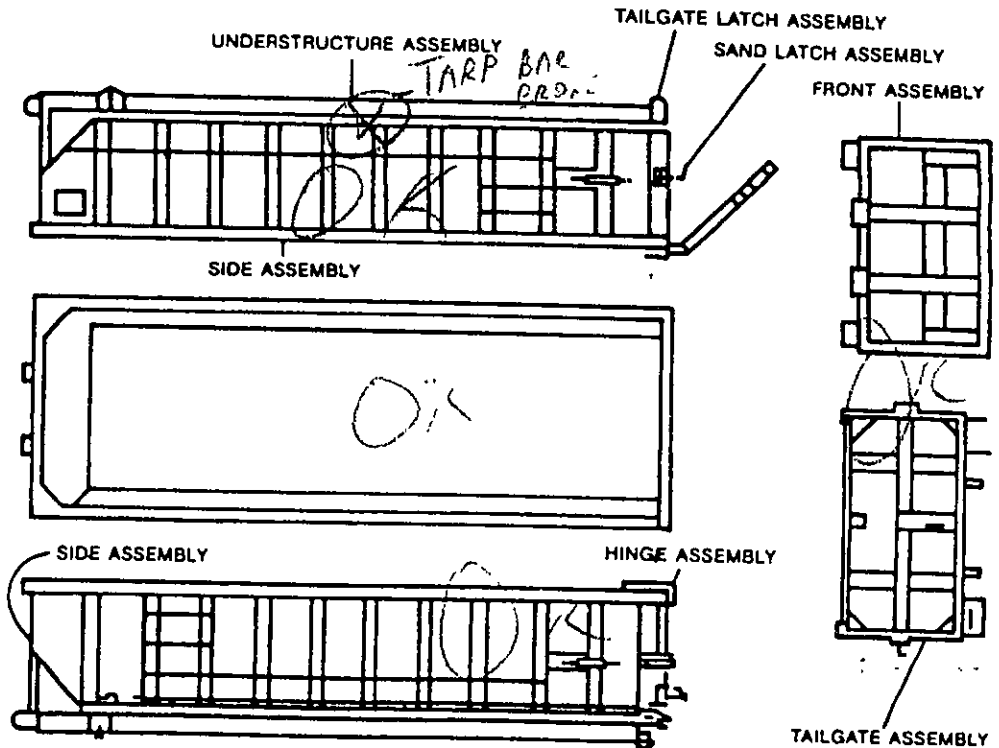
SIGNATURE _____

Indicate below any damage done to roll-off box by circling that portion on the drawing below.

Condition of Tarp: OK
TARP BAR BROKE

Condition of Bows: OK

No. Bows: 5



654 379

R014.

ACTION RESOURCES, INC.

355 Co. Rd. 513 • Hanceville, AL 35077
Ph. (256) 352-2689 Fax (256) 352-2687

BILL OF LADING

NO 13932

C COLLECT AMOUNT
O D \$

SHIPPER <i>AL. ...</i>		LOADING CITY/STATE <i>AL</i>		MANIFEST NO <i>5</i>											
CONSIGNEE <i>"</i>		DESTINATION <i>"</i>													
		TRACTOR NO	TRAILER NO	BOX NO <i>254</i>	DATE SHIPPED										
					LOAD NO										
COMP NO	LOADING STATION	COMMODITY		UNIT	QUANTITY										
		<i>1 Box NON-1142 SOLID WASH</i>		<i>CM</i>	<i>20</i>										
				<table border="1"> <tr> <th colspan="2">QUANTITY</th> </tr> <tr> <td></td> <td>Gross</td> </tr> <tr> <td></td> <td>Tare</td> </tr> <tr> <td></td> <td>Net</td> </tr> <tr> <td></td> <td>Tons</td> </tr> </table>		QUANTITY			Gross		Tare		Net		Tons
QUANTITY															
	Gross														
	Tare														
	Net														
	Tons														
LOADING TIME IN _____ M OUT _____ M AUTHORIZATION-LOADING DEMURRAGE		GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS SHIPPER PER <i>[Signature]</i> CARRIER PER <i>[Signature]</i>													
UNLOADING TIME IN _____ M OUT _____ M AUTHORIZATION-UNLOADING DEMURRAGE		RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED FIRM _____ BY _____ <small>SHOW COMPLETE COMPANY NAME AND SIGNATURE INITIALS NOT ACCEPTED DELIVERY DATE</small>													

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No. 02733		2. Page 1 of		Information in the shaded areas is not required by Federal law.									
3. Generator's Name and Mailing Address Memphis Depot Caretaker 2183 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number											
4. Generator's Phone 901-544-0812						B. State Generator's ID											
5. Transporter 1 Company Name A 11				6. US EPA ID Number A 11		C. State Transporter's ID											
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone											
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 68145				10. US EPA ID Number NE0881723513		E. State Transporter's ID											
						F. Transporter's Phone											
						G. State Facility's ID											
						Facility Phone											
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		Waste No.					
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Thiodiethyl ≤ 6 ppm, 1, 4-Thioxane ≤ 6 ppm)						001 CM		00020		Y							
b.																	
c.																	
d.																	
Additional Containers or Materials Listed Below						Additional Containers or Materials Listed Above											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4999 or DLA 800-851-8061, or Frank Johnson 703-826-3792, Need CD GG0401041																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee						Signature <i>Michael Lee</i>				Month Day Year 11/9/01							
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Rick Dodson				Signature <i>Rick Dodson</i>				Month Day Year 11/9/01			
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name				Signature				Month Day Year			
19. Discrepancy Indication Space																	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																	
Printed/Typed Name						Signature				Month Day Year							



654 381
ROBBIE D. WOOD, INC.

DRIVERS: WHEN FILLING OUT THIS FORM, WRITE ON A
HARD SURFACE. PRESS FIRMLY WITH BALL-POINT PEN.

LOAD #

ROLL-OFF BOX # A119 S/N _____
TRACTOR # 108
DRIVER SIGNATURE _____

PICK-UP INFORMATION

DATE: _____ TIME: _____ AM/PM

SHIPPER: _____

P/U CITY - ST. Memphis, Tenn.

SIGNATURE _____

EMPTY ☐

LOADED ☒

MANIFEST # 02275

DELIVERY INFORMATION

DATE: _____

LOADED BOX:

Unloaded at _____

Drop Loaded at _____

Box returned to: _____

EMPTY BOX DELIVERED TO:

CONSIGNEE _____

CITY, ST. _____

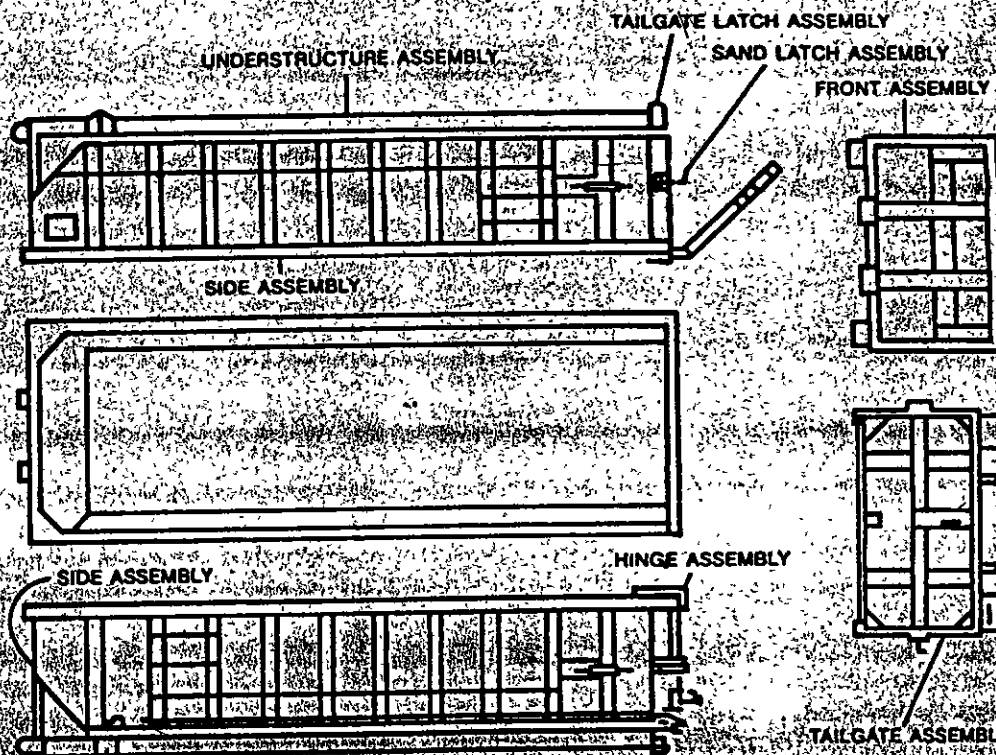
SIGNATURE _____

Indicate below any damage
done to roll-off box by
circling that portion on the
drawing below.

Condition of Tarp: Good

Condition of Bows: Good

No. Bows: 4



Form 973 Edition Printing 1-82-5047

White RDW

Yellow RDW

Pink Catalogue

Goldmaster Shaper

654 382
Robbie D. Wood, Inc.
 P.O. BOX 125 DOLOMITE, AL. 35061

BILL OF LADING

NO. MC 142393

40858

SHIPPER		LOADING CITY/STATE			MANIFEST NO.	
CONSIGNEE		DESTINATION				
		TRACTOR NO.	TRAILER NO.	BOX NO.	DATE SHIPPED	
					LOAD NO.	

COMP NO	LOADING TEMP.	COMMODITY	UNIT	QUANTITY	QUANTITY	
		Waste	CU	1		

LOADING TIME	IN	OUT	M	M	AUTHORIZATION-LOADING DEMURRAGE	GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS.
					SHIPPER PER	
					CARRIER PER	
					RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED	
					FIRM	
					BY	

DETENTION RECORD EXPLAIN TIME SPENT
 AUTHORIZATION-UNLOADING DEMURRAGE
 UNLOADING TIME IN OUT M M

SHOW COMPLETE COMPANY NAME AND SIGNATURE DELIVERY DATE
 INITIALS NOT ACCEPTED

White - R.D.W. Yellow - R.D.W. Pink - Consignee Goldenrod - Shipper

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570	Manifest Document No. 02730	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Center DLA Memphis, TN, 38114 901-544-0812		4. Generator's Phone			
5. Transporter 1 Company Name ROBBIE D. WOOD FWD		6. US EPA ID Number ALP667138891		7. Transporter 2 Company Name	
9. Designated Facility Name and Site Address Celanese Fibers Kimball Monomer Plant 2247 South Hwy 71, Kimball, NE, 68145		10. US EPA ID Number NED06172513			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. Non RCRA Hazardous Waste Solid/Non DOT Regulated, (Triethylglycol ≤ 6 ppm, 1, 4-Thioxane ≤ 6 ppm)		0.01	CM	00.020	Y
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-745-4999 or DLA 300-351-3061, or Frank Johnson 763-825-3782, Need CD GG0401041					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee		Signature Michael Lee		Month Day Year 10/1/90	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature MAURICK SAMUELS		Month Day Year 10/1/90	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	



INVESTIGATIVE DERIVED WASTE

DRAFT

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN4210020570		Manifest Document No 02770		2 Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3 Generator's Name and Mailing Address 2163 Airways Blvd. Memphis Depot Caretaker Memphis, TN, 38114						A. State Manifest Document Number							
4 Generator's Phone 901-544-0612						B. State Generator's ID							
5. Transporter 1 Company Name Action Resources			6. US EPA ID Number ALR000907237			C. State Transporter's ID							
7. Transporter 2 Company Name			8. US EPA ID Number			D. Transporter's Phone 800-328-3845							
9. Designated Facility Name and Site Address Clean Harbors Kimball Incineration Plant 2247 South Hwy 71, Kimball, NE, 69145			10. US EPA ID Number NED981723513			E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone 800-282-0058							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12 Containers		13. Total Quantity		14. Unit W/Vol		Waste No.	
						No.	Type						
a.	<input checked="" type="checkbox"/>	RQ, Hazardous Waste Liquid, n.o.s. (Chloroform) 9, NA3082, PG III, ERG171				027	DM	0.1485		G		D022	
b.	<input checked="" type="checkbox"/>	RQ, Waste Toxic Liquids, Organic, n.o.s. (bis/2-Chloroethyl, Sulfide, 1,4 Thioxane) 6.1, UN2810, PG II, ERG153				005	DM	0076.5		G			
c.		Non RCRA Hazardous Waste Liquid/Non DOT Regulated (Thiodiglycol <6ppm, 1,4, Thioxane <6ppm)				009	DM	00495		G			
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
11a: CH179887						11c: CH179885 1,4 Dithiane <6ppm							
11b: CH179886						M043/T07							
15. Special Handling Instructions and Additional Information													
24 Hour Emergency Contact: Mike Lee 901-745-4999 or DLA 800-851-8081, or Frank Johnson 703-625-3792, Need CD													
GG0401041													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee						Signature <i>Michael Lee</i>				Month Day Year 04/19/01			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name James Nunn						Signature <i>James Nunn</i>				Month Day Year 04/15/01			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19													
Printed/Typed Name						Signature				Month Day Year			

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:03AM P2

FOR INTERNAL USE ONLY:

- ☐ Normal Profile ☐ X-Profile
☐ One Time Waste ☐ Repeat Waste
 Fax X-Profiles only to 817-380-8581

CleanHarbors®

Page 1 of 3

WASTE MATERIAL PROFILE SHEET

Profile Number CH 179885

Chloroform
Profile

A. GENERAL INFORMATION

GENERATOR EPA ID # TN4210020570

GENERATOR CODE (Assigned by Clean Harbors)

ADDRESS 2162 Airways Blvd.

GENERATOR TECHNICAL CONTACT: Michael E. Lee

CUSTOMER CODE (Assigned by Clean Harbors)

ADDRESS P.O. Box 50397

GENERATOR NAME: Memphis Dept. Corrections, DLA

CITY Memphis

STATE TN ZIP 38114

PHONE (901) 544-0612

CUSTOMER NAME: Tennessee Waste Management, Inc.

CITY Sumnerville

STATE S.C. ZIP 29405

B. WASTE DESCRIPTION

Common Name of Waste: chloroform wash water

Process Generating Waste: Wash water from decon at military site that destroyed chemical warfare

Process Generating Waste:
(check one) if spill, origin of spilled material

- ☐ Unused chemical or product
☐ Lab Pack
☐ Spent halogenated solvents
☐ Spent non-halogenated solvents
☐ Wastewater treatment sludge from electroplating or etching operations
☐ Spent plating bath solutions or residues of plating, stripping and cleaning baths where cyanides are used in the process
☐ Wood preservation
☐ Inorganic pigment production
☐ Organic chemical production
☐ Inorganic chemical production
☐ Pesticide production
☐ Explosives production
☐ Petroleum refining
☐ Iron or steel production or finishing
☐ Primary copper production
☐ Primary lead production
☐ Primary zinc production
☐ Primary Aluminum production
☐ Ferro alloy production
☐ Secondary lead smelting
☐ Veterinary pharmaceutical production
☐ Ink formulation
☐ Coating
☐ Other
☐ Unknown

Source of Waste:
(check one)

- ☐ Unused Product or Chemical
☐ Waste by-product from process
☐ Spill clean up
☐ Lab Pack
☐ Planned site remediation
☒ Other: Decon water

Other Process Information:
(check all that apply)

- ☐ Still bottoms
☐ Process scrap
☐ Process development
☐ Out of date product
☐ Spent solvent waste
☐ Treatment residues
☐ Filter cake
☐ Degreasing
☐ Exempt recyclable material
☐ Packaged consumer goods
☐ Off-spec chemical product
☐ Zinc, Al, or tin plating
☐ Anodizing
☐ Cleaning/stripping
☐ Wastewater treatment sludges
☐ Washwaters
☐ Pot liners

Other Process Information:
(check all that apply)

- ☐ Electroplating
☐ Conversion coating
☐ Carbon steel plating
☐ Printed circuit mfg.
☐ Cyanide process
☐ Heat treating
☐ Separator sludge
☐ Oven residue
☐ Catalyst waste
☐ Centrifuged solids
☐ Condensate
☐ Air, steam, or vacuum stripping
☐ Emission control dust
☐ Acid leaching
☐ Dipping operations
☐ Chemical manufacturing
☐ Carbon adsorption
☐ Incineration or thermal treatment
☐ Refining
☐ Drug mfg.
☐ Distillation
☐ Pesticide mfg.
☐ Reclamation
☐ Etching of metals
☐ Bag house dust

Profile Number CH 179885

C. PHYSICAL PROPERTIES (at 25°C or 77°F)

PHYSICAL STATE

- ☐ SOLID WITHOUT FREE LIQUID
☐ POWDER
☐ MONOLITHIC SOLID
☒ LIQUID WITH NO SOLIDS
☐ LIQUID/SOLID MIXTURE
 % FREE LIQUID _____
 % SETTLED SOLID _____
 % TOTAL SUSPENDED SOLID _____
☐ GAS/AEROSOL

NUMBER OF PHASES/LAYERS

☒ 1 ☐ 2 ☐ 3

% BY VOLUME (APPROX.)

TOP _____ MIDDLE _____ BOTTOM _____

ODOR

☒ NONE OR MILD
☐ STRONG

BOILING POINT (if liquid)

☐ ≤ 100°F☒ > 100°F

VISCOSITY (if liquid present)

☒ LOW (e.g. WATER)☐ MEDIUM (e.g. MOTOR OIL)☐ HIGH (e.g. MOLASSES)

COLOR

Clear

MELTING POINT (for solids only)

☐ < 140°F☐ 140-200°F☐ > 200°F

FLASH POINT

- ☐ < 73°F
☐ 73-100°F
☐ 101-140°F
☐ 141-200°F
☒ > 200°F

pH

- ☐ ≤ 2
☐ 2.1 - 6.9
☒ 7 (neutral)
☐ 7.1 - 12.4
☐ > 12.5

SPECIFIC GRAVITY

- ☐ < 0.8 (e.g. Gasoline)
☐ 0.8-1.0 (e.g. Ethanol)
☒ 1.0 (e.g. Water)
☐ 1.0-1.2 (e.g. Antifreeze)
☐ > 1.2 (e.g. Methylene Chloride)

TOTAL ORGANIC CARBON (if liquid)

- ☒ ≤ 1%
☐ 1-9%
☐ ≥ 10%

BTU/LB

- ☒ < 2,000
☐ 2,000-5,000
☐ 5,000-10,000
☐ > 10,000

VAPOR PRESSURE (for liquids only) Water mm Hg

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:04AM P3



Profile Number CH 179885

Page 2 of 3

D. COMPOSITION (Must add up to at least 100%. Include inert materials and/or debris if applicable. Actual percent or range is acceptable)

<u>Water</u>	100	%							
<u>Chloroform</u>		%							
		%							
		%							
		%							
		%							

☐ Check if MSDS attached.

E. CONSTITUENTS — Attach any available analysis. Enter values or ranges where known. For TCLP values, BRL signifies below regulatory level. None, unknown, and present are also acceptable answers.

Are these values based on ☐ Knowledge or ☐ Testing?

INORGANIC

RCRA	REGULATED-METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	OTHER METALS	TOTAL	NON-METALS	WT%
D004	ARSENIC	5.0	BRL		ALUMINUM	BRL	SULFUR	BRL
D005	BARIUM	100.0			ANTIMONY		BROMINE	
D006	CADMIUM	1.0			BERYLLIUM		CHLORINE	
D007	CHROMIUM	5.0			CALCIUM		FLUORINE	
D007	CHROMIUM CR+6				COPPER		IODINE	
D008	LEAD	5.0			MAGNESIUM			BRL
D009	MERCURY	0.2			MOLYBDENUM			
D010	SELENIUM	1.0			NICKEL		AMMONIA	PPM
D011	SILVER	5.0	BRL		POTASSIUM		REACTIVE SULFIDE	BRL
					SILICON		CYANIDE-TOTAL	
					SODIUM		CYANIDE AMENABLE	
					THALLIUM		CYANIDE REACTIVE	BRL
					TIN			
					VANADIUM			
					ZINC	BRL		

BRL = Below Regulatory Limit

ORGANIC

VOLATILE COMPOUNDS				SEMI-VOLATILE COMPOUNDS				
		REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l		REGULATORY LEVEL (mg/l)	TCLP	TOTAL
D018	BENZENE	0.5	BRL		D023	o-CRESOL	200.0	BRL
D019	CARBON TETRACHLORIDE	0.5			D024	m-CRESOL	200.0	
D021	CHLOROBENZENE	100.0	BRL		D025	p-CRESOL	200.0	
D022	CHLOROFORM	5.0			D026	CRESOL (TOTAL)	200.0	
D028	1,2-DICHLOROETHANE	0.5	BRL		D027	1,4-DICHLOROBENZENE	7.5	
D029	1,1-DICHLOROETHYLENE	0.7			D030	2,4-DINITROTOLUENE	0.13	
D035	METHYL ETHYL KETONE	200.0			D032	HEXACHLOROBENZENE	0.13	
D039	TETRACHLOROETHYLENE	0.7			D033	HEXACHLOROBLADIENE	0.5	
D040	TRICHLOROETHYLENE	0.5			D034	HEXACHLOROETHYLENE	3.0	
D043	VINYL CHLORIDE	0.2	BRL		D036	NITROBENZENE	2.0	
					D037	PENTACHLOROPHENOL	100.0	
					D038	PYRIDINE	5.0	
					D041	2,4,5-TRICHLOROPHENOL	400.0	
					D042	2,4,6-TRICHLOROPHENOL	2.0	BRL

PESTICIDES AND HERBICIDES

	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	OTHER
D012	ENDRIN	0.02	BRL	PHENOL
D013	LINDANE	0.4		TOTAL PETROLEUM HYDROCARBONS (SOILS ONLY)
D014	METHOXYCHLOR	10.0		PCB'S
D015	TOXAPHENE	0.5		NONE
D016	2,4-D	10.0		<input type="checkbox"/> < 50 PPM
D017	2,4,5-TP (SILVEX)	1.0		<input type="checkbox"/> ≥ 50 PPM
D020	CHLORDANE	0.03		IF PCB'S ARE PRESENT
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008	BRL	< 50 PPM, IS THE WASTE
				REGULATED BY TSCA
				40 CFR 761?
				<input type="checkbox"/> YES <input type="checkbox"/> NO

OTHER HAZARDS	YES	PESTICIDE	YES	SHOCK SENSITIVE	YES	DEA REGULATED SUBSTANCE	YES
WATER REACTIVE	<input type="checkbox"/>	HERBICIDE	<input type="checkbox"/>	THERMALLY SENSITIVE	<input type="checkbox"/>	OXIDIZER	<input type="checkbox"/>
RADIOACTIVE	<input type="checkbox"/>	EXPLOSIVE	<input type="checkbox"/>	INFECTIOUS, PATHOGENIC, OR ETIOLOGICAL AGENT	<input type="checkbox"/>	REDUCING AGENT	<input type="checkbox"/>
DIOXIN	<input type="checkbox"/>	SPONTANEOUSLY	<input type="checkbox"/>	ASBESTOS	<input type="checkbox"/>	NONE OF THE ABOVE	<input type="checkbox"/>
OSHA REGULATED	<input type="checkbox"/>	IGNITES WITH AIR	<input type="checkbox"/>				
CARCINOGENS	<input type="checkbox"/>						

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED? YES ☐ NO ☒ (If yes, explain)

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:05AM P4



Profile Number CH 179885

Page 3 of 3

F. REGULATORY STATUS

Y N

☒ USEPA HAZARDOUS WASTE? (If Yes List codes.) D022☒ DO ANY GENERATOR STATE WASTE CODES APPLY? IF YES, LIST STATE CODES.

LIST ANY FEDERAL OR STATE WASTE CODES WHICH MAY VARY FROM SHIPMENT TO SHIPMENT.

WILL THE DECISION TO VARY THESE WASTE CODES BE BASED ON ☐ KNOWLEDGE OR ☐ TESTING (check one).
IF KNOWLEDGE, DESCRIBE BASIS OF KNOWLEDGE:

- ☒ IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
- THIS WASTE IS A: ☒ WASTEWATER ☐ NON WASTEWATER PER USEPA DEFINITION IN 40 CFR 268.2
- ☐ IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D011, D012-D017 NON-SAL TREATMENT STANDARDS (UTS)?
- ☐ DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F010 SLUDGE?
- ☐ IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?
- IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401.
- ☐ IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)
- ☐ DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS ≥ 500 PPM?
- ☐ DOES THIS WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE $\geq .3$ KPA (.044 psia)?
- ☐ DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2 psia)?

G. D.O.T. INFORMATION: List all shipping names that may be used. Attach additional pages if necessary.

D.O.T. SHIPPING NAME P.R. Hazardous Waste, liquid, N.O.S. (Chloroform)DOT HAZARD CLASS: 9UNNA # NA-3082

PACKING GROUP (Circle 1)

I

II

III

HAZARD ZONE (Circle 1)

A

B

C

D

WILL THIS SHIPPING NAME VARY? ☐ Y ☐ N IF YES, WILL ASSIGNMENT OF PROPER SHIPPING NAME BE BASED ON ☐ KNOWLEDGE OR ☐ TESTING? (check one) IF KNOWLEDGE, DESCRIBE BASIS OF KNOWLEDGE:

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY: ☐ ONE TIME ☐ WEEKLY ☐ SEMI-MONTHLY ☐ MONTHLY ☐ QUARTERLY ☐ OTHER☐ BULK LIQUID

GALLONS/SHIPMENT: _____ GAL.

FROM TANKS: TANK SIZE _____ GAL.

FROM DRUMS

VEHICLE TYPE:

VAC TRUCK

TANK TRUCK

RAILROAD TANK CAR

CHECK COMPATIBLE STORAGE MATERIALS:

STEEL _____ STAINLESS STEEL (316)

RUBBER LINED _____ FIBERGLASS LINED

OTHER _____

☐ BULK SOLID

TON/YD PER SHIPMENT

STORAGE CAPACITY _____ TON/YD

VEHICLE TYPE:

DUMP TRAILER

ROLL OFF BOX

INTERMODAL ROLLOFF BOX

CUSCO/FACTOR

OTHER _____

☒ CONTAINERIZED

CONTAINERS/SHIPMENT

STORAGE CAPACITY: _____ CONTAINERS

CONTAINER TYPE:

CUBIC YARD BOX

PALLET

TOTE TANK

☒ DRUM SIZE: 55 gal.

CONTAINER MATERIAL:

STEEL

FIBER

☒ PLASTIC

OTHER _____

I. SAMPLE STATUS

REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED. ☐ YES ☒ NO SAMPLED BY _____ DATE SAMPLED _____J. SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS: Incineration onlySPECIAL WASTE HANDLING REQUIREMENTS: Incineration onlyOTHER COMMENTS OR REQUESTS: Waste must be incinerated

K. BIENNIAL/ANNUAL REPORTING INFORMATION.

SIC CODE _____ SOURCE CODE _____ FORM CODE _____ ORIGIN CODE _____

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE

NAME (PRINT)

TITLE

DATE

Michael Lee (Michael Lee) (ERS/SM) (04/16/2001)

FOR CLEAN HARBORS USE ONLY

CHI REPRESENTATIVE COMPLETING PROFILE: _____

654 389

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:05AM P5

FOR INTERNAL USE ONLY:

- ☐ Normal Profile ☐ X-Profile
☒ One Time Waste ☐ Repeat Waste
 Fax X-Profiles only to 617-380-3581

CleanHarbors®

Page 1 of 3

WASTE MATERIAL PROFILE SHEET

Profile Number CH 179886

Mustard (HP) Wash Water Profile

A. GENERAL INFORMATION

GENERATOR EPA ID # TN4210020570

GENERATOR CODE (Assigned by Clean Harbors)

ADDRESS 2163 Airways Blvd.

GENERATOR TECHNICAL CONTACT: Michael E. Lee

CUSTOMER CODE (Assigned by Clean Harbors)

ADDRESS P.O. Box 50397

GENERATOR NAME: Memphis Dept Case taken, PLAT

CITY Memphis

STATE TN ZIP 38114

PHONE: (901) 594-0612

CUSTOMER NAME: Innovative Waste Management, Inc.

CITY Germantown

STATE MS ZIP 39153

B. WASTE DESCRIPTION

Common Name of Waste: Mustard (HP) Wash Water

Process Generating Waste: Wash water from decon of military site that det. type/chemical Warfare

Process Generating Waste:

(check one) If spill, origin of spilled material

- ☐ Unused chemical or product
☐ Lab Pack
☐ Spent halogenated solvents
☒ Spent non-halogenated solvents
☐ Wastewater treatment sludge from electroplating or etching operations
☐ Spent plating bath solutions or residues of plating, stripping and cleaning baths where cyanides are used in the process
☐ Wood preservation
☐ Inorganic pigment production
☐ Organic chemical production
☐ Inorganic chemical production
☐ Pesticide production
☐ Explosives production
☐ Petroleum refining
☐ Iron or steel production or finishing
☐ Primary copper production
☐ Primary lead production
☐ Primary zinc production
☐ Primary Aluminum production
☒ Ferro alloy production
☐ Secondary lead smelting
☐ Veterinary pharmaceutical production
☐ Ink formulation
☐ Coking
☐ Other
☐ Unknown

Source of Waste:

(check one)

- ☐ Unused Product or Chemical
☐ Waste by-product from process
☐ Spill clean up
☐ Lab Pack
☐ Planned site remediation
☒ Other: Decon water

Other Process Information:

(check all that apply)

- ☐ Still bottoms
☐ Process scrap
☐ Process development
☐ Out of date product
☐ Spent solvent waste
☐ Treatment residues
☐ Filter cake
☐ Degreasing
☐ Exempt recyclable material
☐ Packaged consumer goods
☐ Off-spec chemical product
☐ Zinc, Al, or tin plating
☐ Anodizing
☐ Cleaning/stripping
☐ Wastewater treatment sludges
☐ Washwaters
☐ Pot liners

Other Process Information:

(check all that apply)

- ☐ Electroplating
☐ Conversion coating
☐ Carbon steel plating
☐ Printed circuit mfg.
☐ Cysteine process
☐ Heat treating
☐ Separator sludge
☐ Oven residue
☐ Catalyst waste
☐ Centrifuged solids
☐ Condensate
☐ Air, steam, or vacuum stripping
☐ Emission control dust
☐ Acid leaching
☐ Dipping operations
☐ Chemical manufacturing
☐ Carbon adsorption
☐ Incineration or thermal treatment
☐ Refining
☐ Drug mfg.
☐ Distillation
☐ Pesticide mfg.
☐ Reclamation
☐ Etching of metals
☐ Bag house dust

Profile Number CH 179886

C. PHYSICAL PROPERTIES (at 25°C or 77°F)

PHYSICAL STATE

- ☐ SOLID WITHOUT FREE LIQUID
☐ POWDER
☐ MONOLITHIC SOLID
☒ LIQUID WITH NO SOLIDS
☐ LIQUID/SOLID MIXTURE
 % FREE LIQUID _____
 % SETTLED SOLID _____
 % TOTAL SUSPENDED SOLID _____
☐ GAS/AEROSOL

NUMBER OF PHASES/LAYERS

☒ 1 ☐ 2 ☐ 3

% BY VOLUME (APPROX.)

TOP _____ MIDDLE _____ BOTTOM _____

ODOR

- ☒ NONE OR MILD
☐ STRONG

BOILING POINT (if liquid)

- ☐ ≤ 100°F
☒ > 100°F

VISCOSITY (if liquid present)

- ☒ LOW (e.g. WATER)
☐ MEDIUM (e.g. MOTOR OIL)
☐ HIGH (e.g. MOLASSES)

COLOR

clear

MELTING POINT (for solids only)

- ☐ < 140°F
☐ 140-200°F
☐ > 200°F

FLASH POINT

- ☐ < 73°F
☐ 73-100°F
☐ 101-140°F
☐ 141-200°F
☒ > 200°F

pH

- ☐ ≤ 2
☐ 2.1-6.9
☒ 7 (neutral)
☐ 7.1-12.4
☐ ≥ 12.5

SPECIFIC GRAVITY

- ☐ < 0.8 (e.g. Gasoline)
☐ 0.8-1.0 (e.g. Ethanol)
☒ 1.0 (e.g. Water)
☐ 1.0-1.2 (e.g. Antifreeze)
☐ > 1.2 (e.g. Methylene Chloride)

TOTAL ORGANIC CARBON (if liquid)

- ☒ ≤ 1%
☐ 1-9%
☐ ≥ 10%

STU/LB

- ☒ < 2,000
☐ 2,000-5,000
☐ 5,000-10,000
☐ > 10,000

VAPOR PRESSURE (for liquids only) Water mm Hg

654 390

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:06AM P6



Profile Number CH 179886

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D. COMPOSITION (Must add up to at least 100%. Include inert materials and/or debris if applicable. Actual percent or range is acceptable.)

Cul Fide, bis (2-chloroethyl) 51 ppm % Water 1100 %
Mustard HD — % — — %
Thiodiglycol 27 ppm % — — %
1,4 Thioxane 27 ppm % — — %
1,4 Dithiane 27 ppm % — — %

☐ Check if MSDS attached.

E. CONSTITUENTS — Attach any available analysis. Enter values or ranges where known. For TCLP values, BRL signifies below regulatory level. None, unknown, and present are also acceptable answers.

Are these values based on ☐ Knowledge or ☒ Testing?

INORGANIC

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	OTHER METALS	TOTAL	NON-METALS	WT%
D004	ARSENIC	5.0	BRL		ALUMINUM	BRL	SULFUR	BRL
D005	BARIUM	100.0			ANTIMONY		BROMINE	
D006	CADMIUM	1.0			BERYLLIUM		CHLORINE	
D007	CHROMIUM	5.0			CALCIUM		FLUORINE	
D007	CHROMIUM CR+6				COPPER		IODINE	
D008	LEAD	5.0			MAGNESIUM			
D009	MERCURY	0.2			MOLYBDENUM			
D010	SELENIUM	1.0			NICKEL		AMMONIA	PPM
D011	SILVER	5.0	BRL		POTASSIUM		REACTIVE SULFIDE	BRL
					SILICON		CYANIDE-TOTAL	
					SODIUM		CYANIDE AMENABLE	BRL
					THALLIUM		CYANIDE REACTIVE	BRL
					TIN			
					VANADIUM			
					ZINC	BRL		

BRL = Below Regulatory Limit

ORGANIC

VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	SEMI-VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP	TOTAL
D018	BENZENE	0.5	BRL	D023	o-CRESOL	200.0	BRL
D019	CARBON TETRACHLORIDE	0.5		D024	m-CRESOL	200.0	
D021	CHLOROBENZENE	100.0		D025	p-CRESOL	200.0	
D022	CHLOROFORM	5.0		D026	CRESOL (TOTAL)	200.0	
D028	1,2-DICHLOROETHANE	0.5		D027	1,4-DICHLOROBENZENE	7.5	
D029	1,1-DICHLOROETHYLENE	0.7		D030	2,4-DINITROTOLUENE	0.13	
D035	METHYL ETHYL KETONE	200.0		D032	HEXACHLOROBEZ. ZENE	0.13	
D039	TETRACHLOROETHYLENE	0.7		D033	HEXACHLOROBUTADIENE	0.5	
D040	TRICHLOROETHYLENE	0.5		D034	HEXACHLOROETH. ANE	3.0	
D043	VINYL CHLORIDE	0.2	BRL	D036	NITROBENZENE	2.0	
				D037	PENTACHLOROPHENOL	100.0	
				D038	PYRIDINE	6.0	
				D041	2,4,5-TRICHLOROPHENOL	400.0	
				D042	2,4,6-TRICHLOROPHENOL	2.0	BRL

PESTICIDES AND HERBICIDES

PESTICIDES AND HERBICIDES	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	OTHER
D012	ENDRIN	0.02	BRL	PHENOL
D013	LINDANE	0.4		TOTAL PETROLEUM HYDROCARBONS (SOILS ONLY)
D014	METHOXYCHLOR	10.0		PCB'S
D016	TOXAPHENE	0.5		<input checked="" type="checkbox"/> NONE
D018	2,4-D	10.0		<input type="checkbox"/> < 50 PPM
D017	2,4,5-TP (SILVEX)	1.0		<input type="checkbox"/> ≥ 50 PPM
D020	CHLORDANE	0.03		IF PCB'S ARE PRESENT
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008	BRL	< 50 PPM, IS THE WASTE
				REGULATED BY TSCA
				40 CFR 761?
				<input type="checkbox"/> YES <input type="checkbox"/> NO

OTHER HAZARDS	YES	PESTICIDE	YES	SHOCK SENSITIVE	YES	DEA REGULATED SUBSTANCE	YES
WATER REACTIVE	<input type="checkbox"/>	HERBICIDE	<input type="checkbox"/>	THERMALLY SENSITIVE	<input type="checkbox"/>	OXIDIZER	<input type="checkbox"/>
RADIOACTIVE	<input type="checkbox"/>	EXPLOSIVE	<input type="checkbox"/>	INFECTIOUS, PATHOGENIC,	<input type="checkbox"/>	REDUCING AGENT	<input type="checkbox"/>
DIOXIN	<input type="checkbox"/>	SPONTANEOUSLY	<input type="checkbox"/>	OR ETIOLOGICAL AGENT	<input type="checkbox"/>	NONE OF THE ABOVE	<input type="checkbox"/>
OSHA REGULATED CARCINOGENS	<input type="checkbox"/>	IGNITES WITH AIR	<input type="checkbox"/>	ASBESTOS	<input type="checkbox"/>		

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED? YES ☐ NO ☒ (If yes, explain)

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:06AM P7



Profile Number CH 179886

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F. REGULATORY STATUS

- ☒ **USEPA HAZARDOUS WASTE?** (If Yes List codes.) _____
☒ **DO ANY GENERATOR STATE WASTE CODES APPLY?** IF YES, LIST STATE CODES _____
 LIST ANY FEDERAL OR STATE WASTE CODES WHICH MAY VARY FROM SHIPMENT TO SHIPMENT: _____

WILL THE DECISION TO VARY THESE WASTE CODES BE BASED ON ☐ KNOWLEDGE OR ☐ TESTING (check one).
 IF KNOWLEDGE, DESCRIBE BASIS OF KNOWLEDGE: _____

- ☒ **IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?**
 THIS WASTE IS A: ☒ WASTEWATER ☐ NON WASTEWATER PER USEPA DEFINITION IN 40 CFR 268.2.
☒ **IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D011, D012-D017 NON-WASTEWATERS, OR D018-D043 APPLY, ARE THERE ANY UNDERLYING HAZARDOUS CONSTITUENTS (UHC'S) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?** _____
☒ **DOES TREATMENT OF THIS WASTE GENERATE A F005 OR F019 SLUDGE?** _____
☒ **IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?** _____
 IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401. _____
☒ **IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)** _____
☒ **DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS \geq 500 PPM?** _____
☒ **DOES THIS WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE \geq 31 KPa (0.44 psia)?** _____
☒ **DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2 psia)?** _____

G. D.O.T. INFORMATION: List all shipping names that may be used. Attach additional page if necessary.

D.O.T. SHIPPING NAME RQ, Waste Toxic liquids, organic n.o.s. (b.c./2-chloroethyl, sulfide, 1,4 Thioxane) DOT HAZARD CLASS: 6.1
 UNNA # UN2810 PACKING GROUP (Circle 1) I II III HAZARD ZONE (Circle 1) A B C D
 WILL THIS SHIPPING NAME VARY? ☐ Y ☐ N IF YES, WILL ASSIGNMENT OF PROPER SHIPPING NAME BE BASED ON ☐ KNOWLEDGE OR ☐ TESTING? (check one) IF KNOWLEDGE, DESCRIBE BASIS OF KNOWLEDGE: _____

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY: ☒ ONE TIME ☐ WEEKLY ☐ SEMI-MONTHLY ☐ MONTHLY ☐ QUARTERLY ☐ OTHER _____

☐ BULK LIQUID

GALLONS/SHIPMENT: _____ GAL
 FROM TANKS: TANK SIZE _____ GAL
 FROM DRUMS
 VEHICLE TYPE:
☐ VAC TRUCK
☐ TANK TRUCK
☐ RAILROAD TANK CAR
 CHECK COMPATIBLE STORAGE MATERIALS:
☐ STEEL ☐ STAINLESS STEEL (316)
☐ RUBBER LINED ☐ FIBERGLASS LINED
☐ OTHER _____

☐ BULK SOLID

TON/YD PER SHIPMENT
 STORAGE CAPACITY _____ TON/YD
 VEHICLE TYPE:
☐ DUMP TRAILER
☐ ROLL OFF BOX
☐ INTERMODAL ROLLOFF BOX
☐ CUSCOVACTOR
☐ OTHER _____

☒ CONTAINERIZED

CONTAINERS/SHIPMENT
 STORAGE CAPACITY: _____ CONTAINERS
 CONTAINER TYPE:
☐ CUBIC YARD BOX
☐ PALLET
☐ TOTE TANK
☒ DRUM SIZE: 55 gal.
 CONTAINER MATERIAL:
☐ STEEL
☐ FIBER
☒ PLASTIC
☐ OTHER _____

I. SAMPLE STATUS

REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED. ☐ YES ☒ NO SAMPLED BY _____ DATE SAMPLED _____

J. SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS: Incineration only

SPECIAL WASTE HANDLING REQUIREMENTS: Incineration only

OTHER COMMENTS OR REQUESTS: Waste must be incinerated only

K. BIENNIAL/ANNUAL REPORTING INFORMATION.

SIC CODE _____ SOURCE CODE _____ FORM CODE _____ ORIGIN CODE _____

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE: Michael Lee NAME (PRINT) Michael Lee TITLE EPS/SM DATE 104/16/2001

FOR CLEAN HARBORS USE ONLY

CHI REPRESENTATIVE COMPLETING PROFILE: _____

CHI 102

CLEAN HARBORS COPY

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:03AM P2

Page 1 of 3

FOR INTERNAL USE ONLY:

- ☐ Normal Profile ☐ X-Profile
☐ One Time Waste ☐ Repeat Waste
 Fax X-Profiles only to 617-380-3581

Clean Harbors®

WASTE MATERIAL PROFILE SHEET

Profile Number CH 179885

Degradation By-product
Water profile

A. GENERAL INFORMATION

GENERATOR EPA ID # TN 421002 0570

GENERATOR CODE (Assigned by Clean Harbors)

ADDRESS 2163 Airways Blvd.

GENERATOR TECHNICAL CONTACT: Michael E. Lee

CUSTOMER CODE (Assigned by Clean Harbors)

ADDRESS P.O. Box 50397

GENERATOR NAME: Memphis Dept. Conveyance, DLA

CITY Memphis

STATE TN ZIP 38119

PHONE (615) 544-0612

CUSTOMER NAME: Tennessee Waste Management, Inc.

CITY Germantown, S.C.

STATE S.C. ZIP 29485

B. WASTE DESCRIPTION

Common Name of Waste: Degradation by-product - wash water from mustard (40)

Process Generating Waste: Wash water from decon at military site that destroyed chemical warfare

Process Generating Waste:

(check one) If spill, origin of spilled material

- ☐ Unused chemical or product
☐ Lab Pack
☐ Spent halogenated solvents
☐ Spent non-halogenated solvents
☐ Wastewater treatment sludge from electroplating or etching operations
☐ Spent plating bath solutions or residues of plating, stripping and cleaning baths where cyanides are used in the process
☐ Wood preservation
☐ Inorganic pigment production
☐ Organic chemical production
☐ Inorganic chemical production
☐ Pesticide production
☐ Explosives production
☐ Petroleum refining
☐ Iron or steel production or finishing
☐ Primary copper production
☐ Primary lead production
☐ Primary zinc production
☐ Primary Aluminum production
☐ Ferro alloy production
☐ Secondary lead smelting
☐ Veterinary pharmaceutical production
☐ Ink formulation
☐ Coking
☐ Other
☐ Unknown

Source of Waste:
(check one)

- ☐ Unused Product or Chemical
☐ Waste by-product from process
☐ Spill clean up
☐ Lab Pack
☐ Planned site remediation
☒ Other: decon water

Other Process Information:
(check all that apply)

- ☐ Still bottoms
☐ Process scrap
☐ Process development
☐ Out of date product
☐ Spent solvent waste
☐ Treatment residues
☐ Filter cake
☐ Degreasing
☐ Exempt recyclable material
☐ Packaged consumer goods
☐ Off-spec chemical product
☐ Zinc, Al, or tin plating
☐ Anodizing
☐ Cleaning/stripping
☐ Wastewater treatment sludges
☐ Washwaters
☐ Pot liners

Other Process Information:
(check all that apply)

- ☐ Electroplating
☐ Conversion coating
☐ Cathodic steel plating
☐ Printed circuit mfg.
☐ Cyanide process
☐ Heat treating
☐ Separator sludge
☐ Over residue
☐ Catalytic waste
☐ Centrifuged solids
☐ Condensate
☐ Air, steam, or vacuum stripping
☐ Emission control dust
☐ Acid leaching
☐ Dipping operations
☐ Chemical manufacturing
☐ Carbon adsorption
☐ Incineration or thermal treatment
☐ Refining
☐ Drug mfg.
☐ Distillation
☐ Pesticide mfg.
☐ Radiation
☐ Etching of metals
☐ Bag house dust

Profile Number CH 179885

C. PHYSICAL PROPERTIES (at 25°C or 77°F)

PHYSICAL STATE

- ☐ SOLID WITHOUT FREE LIQUID
☐ POWDER
☐ MONOLITHIC SOLID
☒ LIQUID WITH NO SOLIDS
☐ LIQUID/SOLID MIXTURE
 % FREE LIQUID _____
 % SETTLED SOLID _____
 % TOTAL SUSPENDED SOLID _____
☐ GAS/AEROSOL

NUMBER OF PHASES/LAYERS

☒ 1 ☐ 2 ☐ 3

% BY VOLUME (APPROX.)

TOP _____ MIDDLE _____ BOTTOM _____

ODOR

☒ NONE OR MILD
☐ STRONG

BOILING POINT (if liquid)

☐ ≤ 100°F☒ > 100°F

VISCOSITY (if liquid present)

☒ LOW (e.g. WATER)☐ MEDIUM (e.g. MOTOR OIL)☐ HIGH (e.g. MOLASSES)

COLOR

Clean

MELTING POINT (for solids only)

☐ < 140°F☐ 140-200°F☐ > 200°F

FLASH POINT

- ☐ < 73°F
☐ 73-100°F
☐ 101-140°F
☐ 141-200°F
☒ > 200°F

pH

- ☐ ≤ 2
☐ 2.1-6.0
☒ 7 (neutral)
☐ 7.1-12.4
☐ > 12.5

SPECIFIC GRAVITY

- ☐ < 0.8 (e.g. Gasoline)
☐ 0.8-1.0 (e.g. Ethanol)
☒ 1.0 (e.g. Water)
☐ 1.0-1.2 (e.g. Antifreeze)
☐ > 1.2 (e.g. Methylene Chloride)

TOTAL ORGANIC CARBON (if liquid)

- ☒ < 1%
☐ 1-9%
☐ ≥ 10%

BTU/LB

- ☒ < 2,000
☐ 2,000-5,000
☐ 5,000-10,000
☐ > 10,000

VAPOR PRESSURE (for liquids only) Water mm Hg

654 393

FROM : CLEAN HARBORS

FAX NO. : 7813567484

Apr. 16 2001 10:04AM P3



Profile Number CH 179885

Page 2 of 3

D. COMPOSITION (Must add up to at least 100% Include inert materials and/or debris if applicable. Actual percent or range is acceptable)

<u>Water</u>	<u>100</u> %		
<u>Thiodiglycol</u>	<u>< 7 ppm</u> %		
<u>1,4-Thioxane</u>	<u>< 7 ppm</u> %		
<u>1,4-Dithiane</u>	<u>< 7 ppm</u> %		

☐ Check if MSDS attached.

E. CONSTITUENTS — Attach any available analysis. Enter values or ranges where known. For TCLP values, BRL signifies below regulatory level. Nons, unknown, and present are also acceptable answers.

Are these values based on ☐ Knowledge or ☒ Testing?

INORGANIC

RCRA	REGULATED-METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	OTHER METALS	TOTAL	NON-METALS	WT%
D004	ARSENIC	5.0	BRL		ALUMINUM	BRL	SULFUR	BRL
D005	BARIUM	100.0			ANTIMONY		BROMINE	
D006	CADMIUM	1.0			BERYLLIUM		CHLORINE	
D007	CHROMIUM	5.0			CALCIUM		FLUORINE	
D007	CHROMIUM CR+6				COPPER		IODINE	
D008	LEAD	5.0			MAGNESIUM			BRL
D009	MERCURY	0.2			MOLYBDENUM			
D010	SELENIUM	1.0			NICKEL		AMMONIA	PPM
D011	SILVER	5.0	BRL		POTASSIUM		REACTIVE SULFIDE	BRL
					SILICON		CYANIDE-TOTAL	
					THALLIUM		CYANIDE AMENABLE	BRL
					TIN		CYANIDE REACTIVE	
					VANADIUM			
					ZINC	BRL		

* BRL = Below Regulatory Limit

ORGANIC

VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	SEMI-VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l
D018	BENZENE	0.5	BRL	D023	o-CRESOL	200.0	BRL
D019	CARBON TETRACHLORIDE	0.5		D024	m-CRESOL	200.0	
D021	CHLOROBENZENE	100.0		D025	p-CRESOL	200.0	
D022	CHLOROFORM	5.0		D026	CRESOL (TOTAL)	200.0	
D028	1,2-DICHLOROETHANE	0.5		D027	1,4-DICHLOROBENZENE	7.5	
D029	1,1-DICHLOROETHYLENE	0.7		D030	2,4-DINITROTOLUENE	0.13	
D035	METHYL ETHYL KETONE	200.0		D032	HEXACHLOROBENZENE	0.13	
D039	TETRACHLOROETHYLENE	0.7		D033	HEXACHLOROETHYLENE	0.5	
D040	TRICHLOROETHYLENE	0.5		D034	HEXACHLOROETHANE	3.0	
D043	VINYL CHLORIDE	0.2	BRL	D036	NITROBENZENE	2.0	
				D037	PENTACHLOROPHENOL	100.0	
				D038	PYRIDINE	5.0	
				D041	2,4,5-TRICHLOROPHENOL	400.0	
				D042	2,4,6-TRICHLOROPHENOL	2.0	BRL

PESTICIDES AND HERBICIDES	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l	OTHER
D012	ENDRIN	0.02	BRL	PHENOL
D013	LINDANE	0.4		None PPM
D014	METHOXYCHLOR	10.0		TOTAL PETROLEUM HYDROCARBONS (SOILS ONLY)
D015	TOXAPHENE	0.8		PCB'S
D016	2,4-D	10.0		None
D017	2,4,5-TP (SILVEX)	1.0		□ < 50 PPM
D020	CHLORDANE	0.03		□ > 50 PPM
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008	BRL	IF PCB'S ARE PRESENT
				< 50 PPM, IS THE WASTE
				REGULATED BY-TSCA
				40 CFR 761
				□ YES □ NO

OTHER HAZARDS	YES		YES		YES		YES	
WATER REACTIVE	<input type="checkbox"/>	PESTICIDE	<input type="checkbox"/>	SHOCK SENSITIVE	<input type="checkbox"/>	DEA REGULATED SUBSTANCE	<input type="checkbox"/>	YES
RADIOACTIVE	<input type="checkbox"/>	HERBICIDE	<input type="checkbox"/>	THERMALLY SENSITIVE	<input type="checkbox"/>	OXIDIZER	<input type="checkbox"/>	<input type="checkbox"/>
DIOXIN	<input type="checkbox"/>	EXPLOSIVE	<input type="checkbox"/>	INFECTIOUS, PATHOGENIC,	<input type="checkbox"/>	REDUCING AGENT	<input type="checkbox"/>	<input type="checkbox"/>
OSHA REGULATED	<input type="checkbox"/>	SPONTANEOUSLY	<input type="checkbox"/>	OR LETHOLOGICAL AGENT	<input type="checkbox"/>	NONE OF THE ABOVE	<input type="checkbox"/>	<input type="checkbox"/>
CARCINOGENS	<input type="checkbox"/>	IGNITES WITH AIR	<input type="checkbox"/>	ASBESTOS	<input type="checkbox"/>			

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED? YES ☐ NO ☒ (If yes, explain)

654 395

03/28/2001 MON 15:19 FAX 901 380 0485

WASTE MANAGEMENT

006

GENERATOR'S CERTIFICATION

I hereby certify on behalf of Memphis Report Generator, Inc
(Company Name), (hereinafter for convenience called "Generator"), by my
signature and as a duly authorized representative of Generator, that the
attached is an analysis of and information regarding waste originating from
the Generator's facility located at 2163 Airways Blvd, Memphis, TN
(Location). 38114

I further certify that the attached analysis and information is provided
in compliance with ADEM Administrative Code Rules 335-14-3-.08, and
that Chemical Waste Management has been duly authorized by the
Generator to submit the attached information, and this certification where
appropriate, in behalf of the Generator and in compliance with the
aforementioned regulation.

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

The Generator understands that any approval by the Department of
Environmental Management for disposal of any waste described by the
submitted information shall not relieve the Generator from liability for
compliance with all other applicable statutes and regulations regarding the
management of hazardous waste.

Michael Lee
(Signature of Generator)

By: Michael Lee
(Print of type name)

Its: EPS/SM
(Title of individual whose signature appears above)

Date: 04/23/01
(Date on which this document is executed)



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN4210020570		Manifest Document # 02780		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot Caretaker 2183 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number CWMA 910777					
4. Generator's Phone 901-544-0612						B. State Generator's ID #					
5. Transporter 1 Company Name Action Resources						C. State Transporter's ID					
6. US EPA ID Number ALR00000107237						D. Transporter's Phone 800-288-8845					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459						G. State Facility's ID					
10. US EPA ID Number ALD0000622464						H. Facility's Phone 205/652-9721					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. RQ, Hazardous Waste Liquid, n.o.s. (Lead), 9, NA3082, PG III, ERG 171						No. 001		Type DM		Waste No. D008	
Disposal Approval # _____ CWM Profile # CT1638						Quantity 0.9055		Unit G		Waste No. D008	
b. _____											
Disposal Approval # _____ CWM Profile # _____											
c. _____											
Disposal Approval # _____ CWM Profile # _____											
d. _____											
Disposal Approval # _____ CWM Profile # _____											
J. Additional Descriptions for Materials Listed Above 11a						K. Handling Codes for Wastes Listed Above mll					
15. Special Handling Instructions and Additional Information 544-0612 m-l											
Purchase Order # 24 Hour Emergency Contact: Mike Lee 901-706-4099 or DLA 800-851-8081, or Frank Johnson 703-625-3792, Need CD											
Work Order # _____						EMERGENCY CONTACT: GG0401041					
16. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport 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 Mike Lee						Signature <i>Mike Lee</i>			Month Day Year 04/25/01		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name Steve Hawkins						Signature <i>Steve Hawkins</i>			Month Day Year 4/25/01		
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name						Signature			Month Day Year		
19. Discrepancy Indication Space											
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name						Signature			Month Day Year		

654 397

Feb-22-01 02:32pm From-CWM CUSTOMER SERVICE

2056528289

T-333 P 02/03 F-046


**CHEMICAL WASTE MANAGEMENT, INC.
LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (UTS)**
Generator Name: Memphis Depot Caretaker DLACWM Profile Number: CT1638State Manifest No.: CWMA910777

This form is submitted to Chemical Waste Management, Inc. in accordance with 40 CFR Part 268 and LAC33.V Chapter 22, which restrict the land disposal of certain hazardous wastes.

- 1. IDENTIFICATION OF THE WASTE**
 1. Is this waste a nonwastewater or a wastewater? (See 40 CFR 268.2 and LAC33.V.2203) Check One: ☒ Non-Wastewater ☐ Wastewater
 2. If this waste is subject to any California List restrictions, enter the letter from below (A, B, 1 or B.2) next to each restriction that is applicable:
 HOCs _____ PCBs _____ Acids _____ Metals _____ Cyanides _____
 3. Identify All USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261 and LAC33.V Chapter 49. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent and California List treatment standards are listed on the back of this form.
 If F003, multi-source leachate applies, those constituents must be listed and attached by the generator. If D001, D002, D003 (Explosive, water-reactive, or other reactive categories), or D012-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

R E F	4. US EPA HAZARDOUS WASTE CODE(S)	5. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		6. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW
		DESCRIPTION	NONE	
1	D008	Lead		A
2				
3				
4				
5				
6				
7				
8				
9				
10				

To identify F003 or D001, D002, D003 (Explosive, water-reactive, or other reactive categories), D012-D043, underlying hazardous constituent(s), use "F003/Underlying Hazardous Constituent Form" provided (CWM-2004A) and check here: ☐ If no UHCs are present in the waste upon its initial generation check here: ☐
 To list additional USEPA waste code(s) and subcategory(s), use the supplemental sheet provided (CWM-LC-2005-B) and check here: ☐

II. HOW MUST THE WASTE BE MANAGED?

In column 6 above, enter the letter (A, B, 1, B.2, B.3, C, D or E) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7 and LAC 33.V Chapter 22, Subchapter D). Please understand that if you enter the letter B, 1, B.2, B.3, B.4, D or E you are making the appropriate certification as provided below.

A. RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32 or RCRA Section 3004(d) and LAC 33.V.2213 and LAC33.V Chapter 22, Subchapter B.

☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

B.1. RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D, LAC 33.V Chapter 22, Subchapter B, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004 (d) and LAC 33.V.2213 without (impermissible) "dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

B.2. RESTRICTED WASTE FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42 and LAC 33.V.2227 of the Louisiana Hazardous Waste Regulations. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.3. GOOD FAITH ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR 264 Subpart O or 265 Subpart O and LAC 33.V Chapter 31 or LAC33.V Chapter 43, Subchapter N, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.4. WASTEWATER CERTIFICATION

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 and LAC 33.V Chapter 22, Subchapter B to remove the hazardous characteristics. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national cleanup variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 8 above.

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d) and LAC 33.V.2213, and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support and can support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and LAC33.V Chapter 22 Subchapter B and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) and LAC33.V Chapter 22 Subchapter A and LAC 33.V.2213. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment."

E. WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS

This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information

Signature

Title

EPS/SM

Date

04/25/01

The waste identified on the first page of this form is described by any of the following USEPA hazardous waste codes: 01, 002, 003, 004, 005, and all solvent constituents will not be monitored by the treater, and/or this hazardous waste is subject to any prohibitions identified as California List restrictions (40 CFR 269.12 and/or RCRA Section 3004(d)). Each constituent MUST be identified below by checking the appropriate box, and this page must accompany the shipment, along with the previous page of this form. If the waste code P039 describes this waste, then the corresponding list of constituents must be attached. If D001, D002, D003 or D012-D043 require treatment to 100.0% standards, then the underlying hazardous constituent(s) must also be attached.

SOLVENT WASTE TREATMENT STANDARDS

P001 through P005 spent solvent constituents and their associated USEPA hazardous waste code(s).	Treatment Standard		P001 through P005 spent solvent constituents and their associated USEPA hazardous waste code(s).	Treatment Standard	
	Wastewater	Nonwastewater		Wastewater	Nonwastewater

All spent solvent treatment standards are measured through a total waste analysis (TCA), unless otherwise noted. Wastewater limits are mg/l, nonwastewater are mg/kg.

CALIFORNIA LIST TREATMENT STANDARDS--40CFR 269.12, 40 CFR 269.42 and RCRA Section 3004(d)

A waste must first be designated as a US EPA Hazardous waste before the waste can be subject to the California List restrictions.

Restricted waste description	Prohibition	Treatment Standard
Liquid* or nonliquid wastes containing halogenated organic compounds listed in 40 CFR 266, Appendix III	Liquid* wastes: Greater than or equal to 1,000 mg/l Nonliquid wastes: Greater than or equal to 1,000 mg/kg	40 CFR 269.42(a)(2) - INCIN or PSUS
Liquid* wastes containing Poly Chlorinated Biphenyls (PCBs)	Greater than or equal to 50 ppm	40CFR 269.42(a)(1) - INCIN or PSUS Also see 40 CFR 761.60 and .70
Liquid* wastes containing Metals	One or more of the following metals (or elements) at concentrations greater than or equal to the following: Nickel and/or compounds as Ni: 134mg/l Thallium and/or compounds as Tl: 110mg/l	RCRA Section 3004(d)

* - For the definition "liquid" refer to Method 9095, the Paint Filter Liquids Test from EPA manual SW-846

SUBCATEGORY REFERENCES

001:

Ignitable characteristic wastes, except for the 40 CFR 261.21(a)(1) High TOC subcategory, that are managed in non-CWA/non-CWA equivalent/non-Class I SWMA systems.

1. Ignitable characteristic wastes, except for the 40 CFR 261.21(a)(1) High TOC subcategory, that are managed in CWA/CWA-equivalent or Class I SWMA systems.

2. High TOC Ignitable characteristic liquids subcategory based on 40 CFR 261.21(a)(1) - Greater than or equal to 10% total organic carbon.

002:

Corrosive characteristic wastes that are managed in non-CWA/non-CWA-equivalent/non-Class I SWMA systems.

1. Corrosive characteristic wastes that are managed in CWA, CWA-equivalent, or Class I SWMA systems.

03/26/2001 MON 15:18 FAX 901 360 0485

WASTE MANAGEMENT

0004



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File? ☐ YES ☐ NOProfile Number WM **CT1638**☒ Hazardous ☐ Non-Hazardous ☐ TSCARenewal Date: 1/1

A. Waste Generator Information

1. Generator Name: Memphis Depot Corporation 2. SIC Code: 4011
 3. Facility Street Address: 2143 Airways Blvd. Ste. 100 4. Phone: (901) 541-0612
 5. Facility City: Memphis 6. State/Province: TN
 7. Zip/Postal Code: 38114 8. Generator USEPA Federal ID #: TN4240030570
 9. County: Shelby 10. State/Province ID #: 38
 11. Customer Name: Environmental Waste Mgmt. Inc. 12. Customer Phone: (800) 725-2000
 13. Customer Contact: John G. Gentry 14. Customer Fax: (901) 725-2018
 15. Billing Address: P.O. Box 50397, Sumnerville, SC 29158 ☐ Same as above

B. Waste Stream Information

1. Description

a. Name of Waste: Wash water w/ Lead
 b. Process Generating Waste: Recontamination wash water from cleaning Roll-off Box that left contaminated soil (contaminated with lead) at military site that destroyed chemical weapons material in the 1960's

c. Color <u>clear</u>	d. Strong odor (describe): <u>mild</u>	e. Physical state @ 70°F <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Sludge <input type="checkbox"/> Other	f. Layers <input checked="" type="checkbox"/> Single Layer <input type="checkbox"/> Multi-layer	g. Free liquid range to <u>100</u> % h. pH: Range <u>4</u> to <u>8</u> %
--------------------------	---	---	---	---

1. Liquid Flash Point: ☐ <73°F ☐ 73-99°F ☐ 100-139°F ☐ 140-199°F ☒ ≥ 200°F ☐ Not applicable

i. Chemical Composition (List all constituents [including halogenated organics, debris, and UHC's] present in any concentration and submit representative analysis):

Constituents	Concentration Range	Constituents	Concentration Range
<u>water</u>	<u>99-100%</u>		
<u>Lead Solids</u>	<u>0-1%</u>		
<u>(Dirt - soil)</u>			

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

k. ☐ Oxidizer ☐ Pyrophoric ☐ Explosive ☐ Radioactive
☐ Carcinogen ☐ Infectious ☐ Shock Sensitive ☐ Water Reactive

l. Does the waste represented by this profile contain any of the carcinogens which require OSHA notification? (list in Section B.1.)

☐ YES ☒ NO
☐ YES ☒ NO
☐ YES ☒ NO

m. Does the waste represented by this profile contain dioxins? (list in Section B.1.)

☐ YES ☒ NO

n. Does the waste represented by this profile contain asbestos?

☐ YES ☒ NO

o. Does the waste represented by this profile contain benzene?

☐ YES ☒ NO

p. Is the waste subject to RCRA Subpart CC controls?

☐ YES ☒ NO

If no, does the waste meet the organic LDR Exemption?

☐ YES ☒ NO

If no, does the waste contain <500 ppmw volatile organic (VO)?

☒ YES ☐ NO

Volatile organic concentration _____ ppmw

q. Does the waste contain any Class I or Class II ozone-depleting substances?

☐ YES ☒ NO

r. Does the waste contain debris? (list in Section B.1.)

☐ YES ☒ NO

2. Quantity of Waste

Estimated Annual Volume 1 ☐ Tons ☐ Yards ☒ Drums ☐ Other (specify) one time

3. Shipping Information

a. Packaging:

☐ Bulk Solid; Type/Size: _____☐ Bulk Liquid; Type/Size: _____☒ Drum; Type/Size: 55 gallon☐ Other: _____b. Shipping Frequency, Units 1 ☐ Month ☐ Quarter ☐ Year ☒ One time ☐ Other

c. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip d, e, and f.)

☒ YES ☐ NO

03/26/2001 MON 15:18 FAX 901 380 0485

WASTE MANAGEMENT

654 400
000

GENERATOR'S WASTE PROFILE SHEET PLEASE PRINT IN INK OR TYPE

d. Reportable Quantity (lbs.; kgs.): 10 lb e. Hazard Class/ID #: 9
 f. USDOT Shipping Name: h.p. Hazardous Waste, Liquids, P.O.S. (Lead)
 g. Personal Protective Equipment Requirements: None
 h. Transporter/Transfer Station: Robert's Resource

C. Generator's Certification. (Please check appropriate responses, sign and date below.)

1. Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2. ☒ YES ☐ NO
 - a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U) D-028
 - b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (if yes, list in Section B.1.) ☒ YES ☐ NO
 - c. Does this waste contain debris? (if yes, list size and type in Chemical Composition - B.1.) ☐ YES ☒ NO
2. Is this a state hazardous waste? ☐ YES ☒ NO
 Identify ALL state hazardous waste codes _____
3. Is the waste from a CERCLA (40 CFR 300 Appendix B) or state mandated clean-up? ☒ YES ☐ NO
 If yes, attach Record of Decision (ROD), 104/106 or 132 order or court order that governs site clean-up activity. For state mandated clean-up, provide relevant documentation.
4. Does the waste represented by this waste profile sheet contain radioactive material, or is disposal regulated by the Nuclear Regulatory Commission? ☐ YES ☒ NO
5. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (if yes, list in Chemical Composition - B.1.) ☐ YES ☒ NO
 a. If yes, were the PCBs imported into the U.S.? ☐ YES ☐ NO
6. Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste material, and has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? ☒ YES ☐ NO
7. Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? ☒ YES ☐ NO

☐ Check here if a Certificate of Destruction or Disposal is required.

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. I authorize WM to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Certification Signature: Michael Lee Title: EPS/SM Date: 10/23/01
 Name (Type or Print): Michael Lee Company Name: DLA (MSD-E)

☐ Check if additional information is attached. Indicate the number of attached pages _____

D. WMA Management's Decision			FOR WM USE ONLY		
1.	Management Method <input type="checkbox"/> Landfill <input type="checkbox"/> Non-hazardous Solidification <input type="checkbox"/> Bioremediation <input type="checkbox"/> Incineration <input type="checkbox"/> Hazardous Stabilization <input type="checkbox"/> Other (Specify) _____				
2.	Proposed Ultimate Management Facility: _____				
3.	Precautions, Special Handling Procedures, or Limitation on Approval. _____				
4.	Waste Form _____	5.	Source _____	6.	System Type <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Special Waste Decision			Date: _____		
Salesperson's Signature: _____			Date: _____		
Division Approval Signature (Optional): _____			Date: _____		
Special Waste Approvals Person Signature: _____			Date: _____		

654 401



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No. 02700		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Caretaker		2163 Airways Blvd. Memphis, TN, 38114		A1 State Manifest Document Number CWMA 910779		B1 State Generator's ID			
4. Generator's Phone 801-544-0812		5. Transporter 1 Company Name Action Resources Inc.		6. US EPA ID Number ALR0000007237		C1 State Transporter's ID		D1 Transporter's Phone 800-288-8845	
7. Transporter 2 Company Name		8. US EPA ID Number		E1 State Transporter's ID		F1 Transporter's Phone			
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number ALD0000622464		G1 State Facility's ID 205/652-9721		H1 Facility's Phone			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
a. Chloroform Water Non Hazardous/Non Regulated				028 DM 031 P		01705		G	
Disposal Approval # _____ CWM Profile # CT1637									
b. Disposal Approval # _____ CWM Profile # _____									
c. Disposal Approval # _____ CWM Profile # _____									
d. Disposal Approval # _____ CWM Profile # _____									
15. Special Handling Instructions and Additional Information 544-0612 ML				Purchase Order # 24 Hour Emergency Contact: Mike Lee 901-746-4399 or DLA 800-851-8061, or Frank Johnson 703-825-3792, Need CD		EMERGENCY CONTACT: GG0401041			
16. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport 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 Mike Lee				Signature <i>Mike Lee</i>		Month Day Year 04/25/01			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Steve Hawkins				Signature <i>Steve Hawkins</i>		Month Day Year 4/25/01			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 Printed/Typed Name				Signature		Month Day Year			

ACTION RESOURCES, INC.355 Co. Rd. 513 • Hanceville, AL 35077
Ph. (256) 352-2689 Fax (256) 352-2687

BILL OF LADING

17370C COLLECT AMOUNT
D \$

SHIPPER <i>Action Resources</i>		LOADING CITY/STATE <i>Mobile, AL</i>		MANIFEST NO. <i>2789/2790</i>											
CONSIGNEE <i>Steve Hawkins</i>		DESTINATION <i>Enroute AL</i>													
		TRACTOR NO. <i>203</i>	TRAILER NO. <i>396</i>	BOX NO.	DATE SHIPPED <i>4-25-01</i>										
					LOAD NO.										
COMP NO.	LOADING TERMS	COMMODITY		UNIT	QUANTITY										
		<i>DF - WASTE WATER</i>		<i>DF</i>	<i>29</i>										
				<table border="1"> <tr> <th colspan="2">QUANTITY</th> </tr> <tr> <td></td> <td>Gross</td> </tr> <tr> <td></td> <td>Tare</td> </tr> <tr> <td></td> <td>Net</td> </tr> <tr> <td></td> <td>Tons</td> </tr> </table>		QUANTITY			Gross		Tare		Net		Tons
QUANTITY															
	Gross														
	Tare														
	Net														
	Tons														
LOADING TIME		IN <i>1:30 PM</i> OUT <i>3:00 PM</i>		AUTHORIZATION—LOADING DEMURRAGE <i>[Signature]</i>											
UNLOADING TIME		IN _____ M. OUT _____ M.		AUTHORIZATION—UNLOADING DEMURRAGE _____											
GOVERNED BY TARIFFS AND CLASSIFICATIONS ISSUED BY THE CARRIER AND/OR ITS AGENTS SHIPPER PER <i>[Signature]</i> CARRIER PER _____ RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED FIRM _____ BY _____ <small>SHOW COMPLETE COMPANY NAME AND SIGNATURE INITIALS NOT ACCEPTED</small>															

03/28/2001 MON 15:17 FAX 901 380 0485

WASTE MANAGEMENT

0002



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File? ☐ YES ☐ NO☐ Hazardous ☒ Non-Hazardous ☐ TSCAProfile Number: JWM **CT1637**
Renewal Date: 1/1

A. Waste Generator Information

1. Generator Name: Memphis Dept. of Public Works
 2. SIC Code: 8000
 3. Facility Street Address: 2163 Airways Blvd.
 4. Phone: (901) 541-0612
 5. Facility City: Memphis
 6. State/Province: TN
 7. Zip/Postal Code: 38114
 8. Generator USEPA/Federal ID #: TD421002-0570
 9. County: Shelby
 10. State/Province ID #: 33
 11. Customer Name: Transactive Waste Management
 12. Customer Contact: Robert Geronzi
 13. Billing Address: P.O. Box 5297, Sumnerville S.C. 29986
 14. Customer Phone: (803) 725-9200
 15. Customer Fax: (803) 725-8018
☐ Same as above

B. Waste Stream Information

1. Description
 a. Name of Waste: Non-Hazardous Wash Water
 b. Process Generating Waste: Disinfectant Wash Water & certain dry chemicals from below EPA Regulations regarding military solid waste disposal chemical waste from military in the 1960s

c. Color <u>Clear</u>	d. Strong odor (describe): <u>mild</u>	e. Physical state @ 70°F <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Sludge <input type="checkbox"/> Other	f. Layers <input checked="" type="checkbox"/> Single Layer <input type="checkbox"/> Multi-layer	g. Free liquid range to 100% h. pH: Range <u>6</u> to <u>8</u> %
--------------------------	---	---	---	---

i. Liquid Flash Point: ☐ <75°F ☐ 73-99°F ☐ 100-139°F ☐ 140-199°F ☐ ≥ 200°F ☐ Not applicable

j. Chemical Composition (List all constituents including halogenated organics, debris, and UHC's present in any concentration and submit representative analysis):

Constituents	Concentration Range	Constituents	Concentration Range
<u>Water</u>	<u>99-100 %</u>	<u>Chlorine below federal limit</u>	
<u>Excess Solid</u>	<u>0-1 %</u>	<u>See same list as above</u>	
<u>dry soil</u>			

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100 %

k. ☐ Oxidizer ☐ Pyrophoric ☐ Explosive ☐ Radioactive
☐ Carcinogen ☐ Infectious ☐ Shock Sensitive ☐ Water Reactive

l. Does the waste represented by this profile contain any of the carcinogens which require OSHA notification? (list in Section B.1.j)

☐ YES ☒ NO

m. Does the waste represented by this profile contain dioxins? (list in Section B.1.j)

☐ YES ☒ NO

n. Does the waste represented by this profile contain asbestos?

☐ YES ☒ NO

If yes, concentration _____ ppm

☐ friable ☐ non-friable

o. Does the waste represented by this profile contain benzene?

☐ YES ☒ NO

If yes, concentration _____ ppm

Is the waste subject to the benzene waste operations NESHAP?

☐ YES ☒ NO

p. Is the waste subject to RCRA Subpart CC controls?

☐ YES ☒ NO

If no, does the waste meet the organic LDR Exemption?

☒ YES ☐ NO

If no, does the waste contain <500 ppmw volatile organic (VO)?

☐ YES ☒ NO

Volatile organic concentration _____ ppmw

q. Does the waste contain any Class I or Class II ozone-depleting substances?

☐ YES ☒ NO

r. Does the waste contain debris? (list in Section B.1.j)

☐ YES ☒ NO

2. Quantity of Waste

Estimated Annual Volume 39 ☐ Tons ☐ Yards ☒ Drums ☐ Other (specify) _____

3. Shipping Information

a. Packaging

☐ Bulk Solid, Type/Size: _____☐ Bulk Liquid, Type/Size: _____☒ Drum, Type/Size: 55 gallon☐ Other: _____b. Shipping Frequency: Units 39-40 Per ☐ Month ☐ Quarter ☐ Year ☒ One time ☐ Otherc. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (if no, skip d, e, and f) ☐ YES ☒ NO



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

d. Reportable Quantity (lbs.; kgs.): 0 N/A e. Hazard Class/ID #: N/A
 f. USDOT Shipping Name: Chloroform water - Non Hazardous / Non Regulated
 g. Personal Protective Equipment Requirements: _____
 h. Transporter/Transfer Station: Acme Resource, Inc.

C. Generator's Certification (Please check appropriate responses, sign, and date below.)

1. Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2. ☐ YES ☒ NO
 - a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U) _____
 - b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (If yes, list in Section B.1.) ☐ YES ☐ NO
 - c. Does this waste contain debris? (If yes, list size and type in Chemical Composition - B.1.) ☐ YES ☐ NO
2. Is this a state hazardous waste? ☐ YES ☒ NO
 Identify ALL state hazardous waste codes _____
3. Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up? ☒ YES ☐ NO
 If yes, attach Record of Decision (ROD), 104/108 or 122 order or court order that governs site clean-up activity. For state mandated clean-up, provide relevant documentation.
4. Does the waste represented by this waste profile sheet contain radioactive material, or is disposal regulated by the Nuclear Regulatory Commission? ☐ YES ☒ NO
5. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (If yes, list in Chemical Composition - B.1.) ☐ YES ☒ NO
 - a. If yes, were the PCBs imported into the U.S.? ☐ YES ☐ NO
6. Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste material, and has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? ☒ YES ☐ NO
7. Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? ☒ YES ☐ NO

☐ Check here if a Certificate of Destruction or Disposal is required.

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. I authorize WM to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Certification Signature: Michael Lee Title: ES/SM
 Name (Type or Print): Michael Lee Company Name: DUA - (0050-F) Date: 04/23/01
☐ Check if additional information is attached. Indicate the number of attached pages _____

D. WM Management's Decision			FOR WM USE ONLY
1. Management Method	<input type="checkbox"/> Landfill <input type="checkbox"/> Non-hazardous Solidification <input type="checkbox"/> Bioremediation <input type="checkbox"/> Hazardous Stabilization <input type="checkbox"/> Other (Specify) _____		
2. Proposed Ultimate Management Facility:	_____		
3. Precautions, Special Handling Procedures, or Limitation on Approval:	_____		
4. Waste Form _____	5. Source _____	6. System Type _____	
Special Waste Decision _____		<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
Salesperson's Signature: _____		Date: _____	
Division Approval Signature (Optional): _____		Date: _____	
Special Waste Approvals Person Signature: _____		Date: _____	

**NON-HAZARDOUS WASTE TO SUBTITLE D LANDFILL
(SITES 1 AND 24-A)**

DRAFT



FORRESTER LABORATORY ANALYTICALS
4343 Kennedy Ave., East Chicago, IN 46312
Telephone: (219) 397-3931 FAX: (219) 397-6411
(800) 388-7242

MATERIAL DATA SURVEY

PCI Memphis Depot Caretaker Division-

Generator Name: Defense Logistic Agency Billing Name: Innovative Waste Mgmt. Inc.
Street: 2163 Airways Blvd. Bldg. 144 Street: P. O. Box 50397
City: Memphis State: TN Zip: 38114-5210 City: Summerville State: SC Zip: 29485
Technical Contact: Mike Lee Title: Enviro Mgr Phone: 901-544-0612 Fax: 901-745-4280
Federal EPA ID No.: TN4210020570 State ID No.: _____ S.I.C. Code: 9711 Form Code B: _____

☐ Check if you are a Conditionally Exempt Small Quantity Generator

PCI Sales Rep. TH

Common Name of Waste: Non-Hazardous Soil and Debris

Original Process Generating Waste: (must be specific) Clean up of soil, air filters and duct work used in air filtration system.

Method of Shipment ☐ Drum (s) ☒ Bulk 100 tons Quantity _____ per ☐ Wk ☐ Mo ☐ Qtr ☒ Yr ☐ One-tn

MSDS Attached? ☐ Yes ☒ No

TCLP Attached? ☐ Yes ☒ No

☐ Check if sample has been submitted

Color: Brown/Black % Total Halogens: 0 Specific Gravity: 13.86 lb
per gal.

dot (has current edition) ☐ None ☐ MSD ☐ Strong

Physical State _____ Phase/Layers _____

% Liquid _____ % Sludge ☐ Single

100 % Solid _____ % Powder ☐ Multiple, how many _____

% Other, describe _____

CHEMICAL COMPOSITION
(list chemical components and approximate weight %)

Soil/Dirt 98-100

Air Filters & duct work 1.2

(Shreddable) 1.2

Plastic Sheeting _____

OTHER COMPONENTS TOTAL (PPE)

CRUDE OIL ☐ YES ☐ NO ☐ YES ☐ NO

SULFIDES ☐ YES ☐ NO ☐ YES ☐ NO

REACTIVE ☐ YES ☐ NO ☐ YES ☐ NO

CYANIDES ☐ YES ☐ NO ☐ YES ☐ NO

REACTIVE ☐ YES ☐ NO ☐ YES ☐ NO

SULFIDES ☐ YES ☐ NO ☐ YES ☐ NO

HAZARDOUS PROPERTIES

☒ NONE ☐ EXPLOSIVE

☐ WATER REACTIVE ☐ AIR REACTIVE ☐ EXPLOSIVE

☐ SHOCK SENSITIVE ☐ PYROPHORIC ☐ POLYMERIZABLE

☐ RADIOACTIVE ☐ FLAMMABLE ☐ PATHOGEN

☐ CORROSIVE ☐ BIOLOGICAL ☐ BIOLOGICAL

☐ DIOXIDS _____ OTHER _____

D. Based on knowledge or analysis, provide an estimate of values for TCLP concentrations or total in concentrations in ppm.

ORGANIC CHARACTERISTICS

0001 Acetone 5.0 BRL

0002 Benzene 10.0

0003 Cadmium 1.0

0004 Chromium 5.0

0005 Lead 5.0

0006 Mercury 0.2

0007 Selenium 1.0

0008 Silver 5.0

0009 Copper 100.0

0010 Zinc 500.0 BRL

ORGANIC CHARACTERISTICS

0012 Endrin 0.02 BRL

0013 Lindane 0.1

0014 Dieldrin 10.0

0015 Toxaphene 0.5

0016 2,4-Dichlorophenoxyacetic Acid 10.0

0017 2,4,6-TP (Saber) 1.0

0018 Dieldrin 0.5

0019 Carbon Tetrachloride 0.5

0020 Chloroform 100.0

0021 Chlorobenzene 10.0

0022 Chloroform 200.0

0023 n-Heptane 200.0

0024 m-Cresol 200.0

0025 p-Cresol 200.0

0026 Cresol 7.5

0027 1,4-Dichlorobenzene 0.5

0028 1,2-Dichlorobenzene 0.7

0029 1,1-Dichloroethene 0.7

0030 2,4-Dichlorobenzene 0.008

0031 Heptachlor (and its isomers) 0.13

0032 Heptachlorobenzene 0.5

0033 Heptachlorobenzene 3.0

0034 Heptachlorobenzene 200.0

0035 Methyl Ethyl Ketone 2.0

0036 Methylene Chloride 100.0

0037 Pesticide/Insecticide 5.0

0038 Pyridine 0.7

0039 Triphenylmethane 0.5

0040 Trichlorobenzene 100.0

0041 2,4,5-Trichlorophenol 2.0

0042 2,4,6-Trichlorophenol 0.5 BRL

0043 Vinyl Chloride 0.5

For Internal Use Only

Date Received _____

Date Approved _____

Treatment Method _____

Company Name _____

Waste Common Name _____

GENERATOR CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

NAME (Print) Michael E. Lee TITLE EPS/SM

654 407



FEDERAL ENVIRONMENTAL COMPLIANCE AGENCY
4343 Kennedy Ave., Unit Chicago, IL 60632
Telephone: (219) 397-3851 FAX: (219) 397-6411
(800) 368-7242

MATERIAL DATA SURVEY

PCI

Memphis Depot Caretaker Division-

Generator Name: Defense Logistic Agency Billing Name: Innovative Waste Mgmt. Inc.
Street: 2163 Airways Blvd. Bldg. 144 Street: P. O. Box 50397
City: Memphis State: TN Zip: 38114-5210 City: Summerville State: SC Zip: 29485
Technical Contact: Mike Lee Title: Enviro Mgr Phone: 901-544-0612 Fax: 901-745-4280
Federal EPA ID No. TN4210020570 State ID No.: _____ SIC Code: 9711 Form Code B: _____
☐ Check if you are a Conditionally Exempt Small Quantity Generator PCI Sales Rep. TH

Common Name of Waste Non-Hazardous Soil and DebrisOriginal Process Generating Waste (must be specific) Clean up of soil, air filters and duct work used in air filtration system.Method of Shipment ☐ Drum (s) ☒ Bulk 100 tons Quantity _____ per ☐ Wk ☐ Mo ☐ Qtr ☒ Yr ☐ One-tnMSDS Attached? ☐ Yes ☒ No TCLP Attached? ☐ Yes ☒ No ☐ Check if sample has been submitted

I. PHYSICAL PROPERTIES @ 25°C (77°F)

Color: Brown/Black % Total Halogens: 0 Specific Gravity: 13.86 lb
Sol (in water) ☐ None ☐ Mild ☐ Strong per gal.
Physical State _____ Phase/Layers _____
% Liquid _____ % Sludge ☐ Single
100 % Solid _____ % Powder ☐ Multiple, how many _____
% Other, describe _____

Bar/Lb.	pH	Flashpoint
<input checked="" type="checkbox"/> < 5,000	<input type="checkbox"/> < 2.0	<input type="checkbox"/> < 73°
<input type="checkbox"/> 5-10,000	<input type="checkbox"/> 2.0-12.5	<input type="checkbox"/> 73-140°
<input type="checkbox"/> > 10,000	<input type="checkbox"/> > 12.5	<input type="checkbox"/> 140-200°
Exact _____	Exact _____	<input checked="" type="checkbox"/> > 200°

II. CHEMICAL COMPOSITION

(List all chemical components and participating agents)

Soil/Dirt 98-100
Air Filters & duct work 1-2
(Shreddable) 1-3
Plastic Sheeting _____

OTHER COMPONENTS TOTAL (PPM)

OTHER COMPONENTS	NO	YES	NO	YES
CHLORIDES	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SULFIDES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
REACTIVE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CYANIDES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PEROXIDES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

HAZARDOUS PROPERTIES
☒ NONE ☐ SCORCHING ☐ HIGHLY FLAMMABLE
☐ WATER REACTIVE ☐ AIR REACTIVE ☐ EXPLOSIVE
☐ SHOCK SENSITIVE ☐ PYROPHORIC ☐ POLYMERIZABLE
☐ RADIOACTIVE ☐ IRRITANT ☐ PATHOGEN
☐ CORROSIVE ☐ BIOLOGICAL ☐ BIOLOGICAL
☐ OXIDIZING _____ OTHER _____

Total of hazardous concentrations must be ≥ 100%

E. RCRA CHARACTERIZATION

- Is this material a "Hazardous Waste" under 40CFR 261.37? ☐ Yes ☒ No
- Is this a "Characteristic Waste"? ☐ Yes ☒ No
If "Yes" is it: ☐ D001 Ignitable ☐ D002 Corrosive ☐ D003 Reactive
☐ D004 - D005 Toxic, give specific codes: _____
- Is this an "F" or a "K" waste or mixed with one? ☐ Yes ☒ No
If "Yes" give waste codes from 40CFR 261.31 and/or 261.32: _____
- Is this a commercial chemical product or spill cleanup that would carry a "U" or "P" waste code under 40CFR 261.33 (a) or (f)? ☐ Yes ☒ No
If "Yes" give the waste code: _____
- Is this a state regulated waste? ☐ Yes ☒ No
If "Yes" give code: _____

DOT CHARACTERIZATION

- Is this a "Hazardous Substance/Marine Pollutant" as defined in 49CFR D.O.T.7? ☐ Yes ☒ No
- If "Yes" give the proper D.O.T. Shipping Description from 49CFR 172.101: Non-Hazardous/Non-Regulated Soil & Debris UNNA# N/A
- Hazard Class: Non Regulated PG N/A Packaging Group: N/A
- Give the two primary hazardous constituents: None

GENERATOR CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

NAME (Print) Michael E. Lee TITLE EPS/SM

Based on knowledge or analysis, provide an estimate or value for TCLP concentrations or total metal concentrations in ppm.

ORGANIC CHARACTERISTICS	CONC.	UNIT
D004 Arsenic	5.0	BRL
D005 Barium	100.0	"
D006 Cadmium	1.0	"
D007 Chromium	5.0	"
D008 Lead	5.0	"
D009 Mercury	0.2	"
D010 Selenium	1.0	"
D011 Silver	5.0	"
D012 Copper	100.0	"
D013 Zinc	500.0	BRL

ORGANIC CHARACTERISTICS	CONC.	UNIT
D012 Endrin	0.02	BRL
D013 Lindane	0.4	"
D014 Methoxychlor	10.0	"
D015 Toxaphene	0.5	"
D016 2,4-Dichlorophenoxyacetic Acid	10.0	"
D017 2,4,5-TP (Silvex)	1.0	"
D018 Benzene	0.5	"
D019 Carbon Tetrachloride	0.5	"
D020 Chloroform	0.63	"
D021 Chlorobenzene	100.0	"
D022 Chloroform	6.0	"
D023 o-Cresol	200.0	"
D024 m-Cresol	200.0	"
D025 p-Cresol	200.0	"
D026 Cresol	200.0	"
D027 1,4-Dichlorobenzene	7.5	"
D028 1,2-Dichlorobenzene	0.5	"
D029 1,1-Dichloroethylene	0.7	"
D030 2,4-Dibromobenzene	0.13	"
D031 Heptachlor (and its epoxide)	0.008	"
D032 Hexachlorobenzene	0.13	"
D033 Hexachlorobutadiene	0.5	"
D034 Hexachlorocyclopentadiene	2.0	"
D035 Methyl Ethyl Ketone	200.0	"
D036 Nitrobenzene	2.0	"
D037 Polychlorobiphenyl	100.0	"
D038 Pyridine	5.0	"
D039 Tetrachloroethylene	0.7	"
D040 Trichloroethylene	0.5	"
D041 2,4,6-Trichlorophenol	400.0	"
D042 2,4,6-Trichlorophenol	2.0	"
D043 Vinyl Chloride	0.2	BRL

For Internal Use Only

Date Received _____

Date Approved _____

Treatment Method _____

Company Name _____

Waste Common Name _____

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN 4210020570	Manifest Doc No. 12-00	2. Page 1 of 1	
3. Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114					
4. Generator's Phone ()					
5. Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.		6. US EPA ID Number IND000646943	A. Transporter's Phone (901) 353-5291		
7. Transporter 2 Company Name		8. US EPA ID Number	B. Transporter's Phone		
9. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10. US EPA ID Number TN-D-000772186	C. Facility's Phone (901) 353-5291		
11. Waste Shipping Name and Description			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL			001	1200	1200
b.					
c.					
d.					
D. Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS			E. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information 24 hour emergency phone #: 901-544-0612 Trailer #: 436 463 Land Ban Letter Attached Seal #: NA 1 800-851-8061					
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste					
Printed/Typed Name Philip's		Signature Philip's		Month Day Year 12 6 00	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name JOSEPH P. BARTON		Signature Joseph P. Barton		Month Day Year 12 6 00	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

GENERATOR

TRANSPORTER

FAC

TY

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location: Defense Logistic Agency, 2163 Airways Blvd., Memphis, TN 38114

EPA ID Number: TN4210020570 Manifest Number: 12600

Waste Analysis Available ☒ YES ☐ NO ☒ On File at Facility Date: 12/6/00

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP (Please check the applicable treatability group)		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
a	b	c	d	Non-wastewater >1% TOC & > 1% TSS	e	Wastewater f	List all applicable constituents from Table I and/or key below h
206154	X						

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm
2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l
3) Nickel (Ni) > = 134 mg/l
4) Thallium (Tl) > = 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrahydrofuran | 32) Xylene (Total) |

I certify, under penalty of law, that the above information is accurate and true.

Signature Chris Rose

Printed Name CHRIS ROSE

654 410

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID **0101689-08**

Field ID : **DF/24-A/1026/R/08**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate				RL	1311
TCLP Semivolatiles				02/01/01	PF	8270C
					01/29/01	3510C
					01/31/01	
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	69	29 110
S2 - 2-Fluorobiphenyl	73	38 107
S3 - 4-Terphenyl-d14	84	33 122
S4 - Phenol-d6	22	7 58
S5 - 2,4,6-Tribromophenol	65	16 138
S6 - 2-Fluorophenol	33	8 88


Data Validator

ND - Not Detected


Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID : **0101689-09**Matrix : **SOIL**Field ID : **DF/24-A/1026/R/09**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED	BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL	1311
Silver - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Barium - TCLP	1.07	mg/L	0.025	01/31/01		SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01		JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B


 Data Validator

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-09**Field ID : **DF/24-A/1026/R/09**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate				01/29/01	TL 1311
TCLP Volatile Organics				02/01/01	EM	8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	109	74 123
S2 - Toluene-d8	99	86 112
S3 - 4-Bromofluorobenzene	96	81 115
S4 - 1,2-Dichloroethane-d4	102	80 120

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 413

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-09**Field ID : **DF/24-A/1026/R/09**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate				RL	1311
TCLP Semivolatiles				02/01/01	PF	8270C
					01/31/01	3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			
Surrogate Standard	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	80		29	110		
S2 - 2-Fluorobiphenyl	82		38	107		
S3 - 4-Terphenyl-d14	107		33	122		
S4 - Phenol-d6	23		7	58		
S5 - 2,4,6-Tribromophenol	71		16	138		
S6 - 2-Fluorophenol	36		8	88		



Data Validator

ND - Not Detected


Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID : **0101689-10**Field ID : **DF/24-A/1026/R/010**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.18	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


 Data Validator

ND - Not Detected

654 415

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID **0101689-10**

Field ID : **DF/24-A/1026/R/010**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/01/01	01/29/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			
Surrogate Standard	% Recovery		QC Limits			
S1 - Dibromofluoromethane	109		74 123			
S2 - Toluene-d8	96		86 112			
S3 - 4-Bromofluorobenzene	96		81 115			
S4 - 1,2-Dichloroethane-d4	103		80 120			



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 416

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #


Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-10**
Field ID : **DF/24-A/1026/R/010**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/29/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	73	29 110
S2 - 2-Fluorobiphenyl	75	38 107
S3 - 4-Terphenyl-d14	106	33 122
S4 - Phenol-d6	22	7 58
S5 - 2,4,6-Tribromophenol	63	16 138
S6 - 2-Fluorophenol	34	8 88


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 417

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID : **0101689-11**Matrix : **SOIL**Field ID : **DF/24-A/1026/R/011**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/30/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.00	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

654 418

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-11**
Field ID : **DF/24-A/1026/R/011**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/01/01	01/30/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits	
S1 - Dibromofluoromethane	109	74	123
S2 - Toluene-d8	97	86	112
S3 - 4-Bromofluorobenzene	96	81	115
S4 - 1,2-Dichloroethane-d4	98	80	120



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 419

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN**P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-11**Field ID : **DF/24-A/1026/R/011**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate				01/30/01	RL 1311
TCLP Semivolatiles				02/01/01	PF 8270C	3510C
Dilution Factor	1				01/31/01	
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	75	29 110
S2 - 2-Fluorobiphenyl	77	38 107
S3 - 4-Terphenyl-d14	95	33 122
S4 - Phenol-d6	22	7 58
S5 - 2,4,6-Tribromophenol	66	16 138
S6 - 2-Fluorophenol	34	8 88

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits


654 420

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field**
Memphis, TN**P.O. Box 50397**
Summerville, SC 29485-0397Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID : **0101689-12**Matrix : **SOIL**Field ID : **DF/24-A/1026/R/012**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate					
Silver - TCLP	ND	mg/L	0.010	01/31/01	01/30/01 TL	1311
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	0.844	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 421

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-12**
Field ID : **DF/24-A/1026/R/012**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/01/01	01/30/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	107	74 123
S2 - Toluene-d8	98	86 112
S3 - 4-Bromofluorobenzene	94	81 115
S4 - 1,2-Dichloroethane-d4	105	80 120

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 422

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID **0101689-12**


Field ID : **DF/24-A/1026/R/012**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/30/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/Kg	0.020			
2,4-Dinitrotoluene	ND	mg/Kg	0.020			
Hexachlorobenzene	ND	mg/Kg	0.020			
Hexachlorobutadiene	ND	mg/Kg	0.020			
Hexachloroethane	ND	mg/Kg	0.020			
2-Methylphenol	ND	mg/Kg	0.020			
3-Methylphenol	ND	mg/Kg	0.020			
4-Methylphenol	ND	mg/Kg	0.020			
Nitrobenzene	ND	mg/Kg	0.020			
Pentachlorophenol	ND	mg/Kg	0.040			
Pyridine	ND	mg/Kg	0.020			
2,4,5-Trichlorophenol	ND	mg/Kg	0.020			
2,4,6-Trichlorophenol	ND	mg/Kg	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	73	29 110
S2 - 2-Fluorobiphenyl	76	38 107
S3 - 4-Terphenyl-d14	103	33 122
S4 - Phenol-d6	22	7 58
S5 - 2,4,6-Tribromophenol	68	16 138
S6 - 2-Fluorophenol	35	8 88


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397


Site ID **Dunn Field**
Memphis, TN

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID : **0101689-13**
Field ID : **DF/24-A/1026/R/013**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/30/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.08	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-13**
Field ID : **DF/24-A/1026/R/013**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/02/01	01/30/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			
Surrogate Standard	% Recovery		QC Limits			
S1 - Dibromofluoromethane	112		74	123		
S2 - Toluene-d8	94		86	112		
S3 - 4-Bromofluorobenzene	97		81	115		
S4 - 1,2-Dichloroethane-d4	97		80	120		


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 425

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
 FID #

Date Arrived **01/29/01**
 ETC Order Number **0101689**

ETC Lab ID **0101689-13**
 Field ID : **DF/24-A/1026/R/013**

Matrix : **SOIL**
 Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/30/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	76	29 110
S2 - 2-Fluorobiphenyl	76	38 107
S3 - 4-Terphenyl-d14	99	33 122
S4 - Phenol-d6	23	7 58
S5 - 2,4,6-Tribromophenol	69	16 138
S6 - 2-Fluorophenol	35	8 88


 Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 426

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID : **0101689-14**

Field ID : **DF/24-A/1026/R/014**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED	BY	METHOD
TCLP Extraction	Leachate				01/30/01	TL	1311
Silver - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Barium - TCLP	1.44	mg/L	0.025	01/31/01		SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01		JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B


Data Validator

ND - Not Detected

654 427

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-14**Field ID : **DF/24-A/1026/R/014**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/02/01	01/30/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	106	74 123
S2 - Toluene-d8	99	86 112
S3 - 4-Bromofluorobenzene	95	81 115
S4 - 1,2-Dichloroethane-d4	94	80 120

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 428

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-14**Field ID : **DF/24-A/1026/R/014**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/30/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			
Surrogate Standard	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	75		29	110		
S2 - 2-Fluorobiphenyl	77		38	107		
S3 - 4-Terphenyl-d14	104		33	122		
S4 - Phenol-d6	23		7	58		
S5 - 2,4,6-Tribromophenol	68		16	138		
S6 - 2-Fluorophenol	35		8	88		


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 429

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID : **0101689-15**

Field ID : **DF/24-A/1026/R/015**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED	BY	METHOD
TCLP Extraction	Leachate						
Silver - TCLP	ND	mg/L	0.010	01/31/01	01/30/01	TL	1311
Arsenic - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Barium - TCLP	1.62	mg/L	0.025	01/31/01		SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01		IF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B


Data Validator

ND - Not Detected

654 430

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-15**
Field ID : **DF/24-A/1026/R/015**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/02/01	01/30/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			
Surrogate Standard	% Recovery		QC Limits			
S1 - Dibromofluoromethane	110		74 123			
S2 - Toluene-d8	104		86 112			
S3 - 4-Bromofluorobenzene	96		81 115			
S4 - 1,2-Dichloroethane-d4	97		80 120			


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN**P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-15**Field ID : **DF/24-A/1026/R/015**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/30/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	73	29 110
S2 - 2-Fluorobiphenyl	75	38 107
S3 - 4-Terphenyl-d14	106	33 122
S4 - Phenol-d6	22	7 58
S5 - 2,4,6-Tribromophenol	66	16 138
S6 - 2-Fluorophenol	34	8 88



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 432

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field
Memphis, TN**

**P.O. Box 50397
Summerville, SC 29485-0397**

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID : **0101689-16**

Matrix : **SOIL**

Field ID : **DF/24-A/1026/R/016**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/30/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.43	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 433

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-16**
Field ID : **DF/24-A/1026/R/016**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/02/01	01/30/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	107	74 123
S2 - Toluene-d8	99	86 112
S3 - 4-Bromofluorobenzene	95	81 115
S4 - 1,2-Dichloroethane-d4	94	80 120



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-16**Field ID : **DF/24-A/1026/R/016**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/30/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			
Surrogate Standard	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	82		29	110		
S2 - 2-Fluorobiphenyl	82		38	107		
S3 - 4-Terphenyl-d14	106		33	122		
S4 - Phenol-d6	24		7	58		
S5 - 2,4,6-Tribromophenol	70		16	138		
S6 - 2-Fluorophenol	38		8	88		



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654

435

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID : **0101689-17**Matrix : **SOIL**Field ID : **DF/24-A/1026/R/017**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/30/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.13	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

654 436

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-17**
Field ID : **DF/24-A/1026/R/017**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/02/01	01/30/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			
Surrogate Standard	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	77		29	110		
S2 - 2-Fluorobiphenyl	81		38	107		
S3 - 4-Terphenyl-d14	118		33	122		
S4 - Phenol-d6	24		7	58		
S5 - 2,4,6-Tribromophenol	69		16	138		
S6 - 2-Fluorophenol	37		8	88		


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits


ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 437

Client Name **Innovative Waste Management**Site ID **Dunn Field**
Memphis, TN**P.O. Box 50397**
Summerville, SC 29485-0397Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID : **0101689-18**Matrix : **SOIL**Field ID : **DF/24-A/1026/R/018**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/30/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.27	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
 FID #

Date Arrived **01/29/01**
 ETC Order Number **0101689**

ETC Lab ID **0101689-18**
 Field ID : **DF/24-A/1026/R/018**

Matrix : **SOIL**
 Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/02/01	01/30/01	TL 1311 LS 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			
Surrogate Standard	% Recovery		QC Limits			
S1 - Dibromofluoromethane	122		74	123		
S2 - Toluene-d8	109		86	112		
S3 - 4-Bromofluorobenzene	112		81	115		
S4 - 1,2-Dichloroethane-d4	121 Q		80	120		



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 439

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-18**
Field ID : **DF/24-A/1026/R/018**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/02/01	01/30/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	81	29 110
S2 - 2-Fluorobiphenyl	85	38 107
S3 - 4-Terphenyl-d14	113	33 122
S4 - Phenol-d6	24	7 58
S5 - 2,4,6-Tribromophenol	74	16 138
S6 - 2-Fluorophenol	38	8 88


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.


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654

449

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID : **0101689-19**Field ID : **DF/24-A/1026/R/019**Sample ID : **5 Working Day TAT**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate					
Silver - TCLP	ND	mg/L	0.010	01/31/01	01/30/01 TL	1311
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.40	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

654 441

ENVIRONMENTAL TESTING & CONSULTING, INC.

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Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
 FID #

Date Arrived **01/29/01**
 ETC Order Number **0101689**

ETC Lab ID **0101689-19**
 Field ID : **DF/24-A/1026/R/019**

Matrix : **SOIL**
 Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/02/01	01/30/01	TL 1311 LS 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	117	74 123
S2 - Toluene-d8	111	86 112
S3 - 4-Bromofluorobenzene	112	81 115
S4 - 1,2-Dichloroethane-d4	123 Q	80 120



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 442

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-19**
Field ID : **DF/24-A/1026/R/019**
Sample ID : **5 Working Day TAT**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate				RL	1311
TCLP Semivolatiles				02/02/01	PF	8270C
Dilution Factor	1				01/31/01	3510C
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			
Surrogate Standard	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	68		29	110		
S2 - 2-Fluorobiphenyl	71		38	107		
S3 - 4-Terphenyl-d14	97		33	122		
S4 - Phenol-d6	21		7	58		
S5 - 2,4,6-Tribromophenol	64		16	138		
S6 - 2-Fluorophenol	33		8	88		


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 6, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0250/T1/ 001		ND	ND	N/A	ND	
DF/24A/ 0250/T2/ 002		ND	ND	N/A	ND	
DF/24A/ 0250/T1/ 003		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 7, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0251/T2/ 004		ND	ND	N/A	ND	
DF/24A/ 0251/T1/ 005		ND	ND	N/A	ND	
DF/24A/ 0251/T1/ 006		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 8, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0252/T1/ 007		ND	ND	N/A	ND	
DF/24A/ 0252/T2/ 008		ND	ND	N/A	ND	
DF/24A/ 0252/T1/ 009		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 12, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0256/T1 /010		ND	ND	N/A	ND	
DF/24A/ 0256/T1 /010 DUP		ND	ND	N/A	ND	
DF/24A/ 0256/T2 /011		ND	ND	N/A	ND	
DF/24A/ 0256/T1 /012		ND	ND	N/A	ND	
DF/24A/ 0256/T2 /013		ND	ND	N/A	ND	
DF/24A/ 0256/T1 /014		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

N/A = Not analyzed

Dunn Field, Memphis Defense Depot
Results for CWM Soil Sample Analysis
Analyst: Shawn Heinlein

ND= Not detected at or above the method detection limit (MDL)
MDL= 200 ppb
BDL= Below detection limit, results > 100ppb, but < 200 ppb
MS= matrix spike
MSD= matrix spike duplicate
DUP= duplicate
N/A = Not analyzed

N/A = Not analyzed

SBCCOM
Monit ring Branch Laboratory

CLEARANCE REPORT

SEP 15, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0259/T1 /026		ND	ND	N/A	ND	
DF/24A/ 0259/T2 /027		ND	ND	N/A	ND	
DF/24A/ 0259/T1 /028		ND	ND	N/A	ND	
DF/24A/ 0259/T2 /029		ND	ND	N/A	ND	
DF/24A/ 0259/SP LIT/001A		544	815	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

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Monit ring Branch Laboratory

CLEARANCE REPORT

SEP 19, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0263/T2 /033		ND	ND	N/A	ND	
DF/24A/ 0263/GR AB/003		507	242	ND	ND	
DF/24A/ 0263/GR AB/004		30	BLD	ND	ND	
DF/24A/ 0263/T1 /034		ND	83	ND	ND	
DF/24A/ 0263/T2 /035		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

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Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 18, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4-Thioxane	1,4-Dithiane	TDG	Mustard	
DF/24A/0262/T1/030		ND	ND	N/A	ND	
DF/24A/0262/GRAB/001		41	BLD	ND	ND	
DF/24A/0262/GRAB/002		113	53	ND	ND	
DF/24A/0262/T2/031		ND	ND	N/A	ND	
DF/24A/0259/T1/032		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 20, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Drury

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0264/T1 /036		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 21, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0265/SD C/001		ND	ND	N/A	ND	
DF/24A/ 0265/SD C/002		ND	ND	N/A	ND	
SF/24A/ 0265/SD C/003		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 21, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0265/T2 /037		ND	ND	N/A	ND	
DF/24A/ 0265/GR AB/005		BDL	BDL	N/A	ND	
DF/24A/ 0265/GR AB/006		ND	ND	N/A	ND	
DF/24A/ 0256/SD C/001		ND	ND	N/A	ND	
DF/24A/ 0256/SD C/002		ND	ND	N/A	ND	
DF/24A/ 0256/SD C/003		ND	ND	N/A	ND	
DF/24A/ 0265/T1 /038		507	696	ND	ND	
DF/24A/ 0265/GR AB/007		2003	6067	ND	ND	
DF/24A/ 0265/GR AB/008		4429	5168	ND	ND	
DF/24A/ 0265/GR AB/009		285	694	ND	ND	
DF/24A/ 0265/GR AB/010		665	804	ND	ND	
DF/24A/ 0265/GR AB/010		656	732	ND	ND	

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Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 22, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0266/T1 /040		68	119	ND	ND	
DF/24A/ 0266/GR AB/014		3451	6527	ND	ND	
DF/24A/ 0266/GR AB/015		89	117	ND	ND	
DF/24A/ 0266/T2 /041		ND	35	ND	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 25, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Wyatt McNutt

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0269/GR AB/016		1282	2180	ND	ND	
DF/24A/ 0269/T1 /042		152	396	ND	ND	
DF/24A/ 0269/GR AB/017		151	222	ND	ND	
DF/24A/ 0269/GR AB/018		583	961	ND	ND	
DF/24A/ 0269/T2 /043		ND	ND	ND	ND	
DF/24A/ 0269/T1 /044		ND	ND	ND	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

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Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 25, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Wyatt McNutt

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0270/T2 /045		210	230	ND	ND	
DF/24A/ 0270/GR AB/019		1900	2120	ND	ND	
DF/24A/ 0270/GR AB/020		170	140	ND	ND	
DF/24A/ 0269/GR AB/021		1970	2170	ND	ND	
DF/24A/ 0270/T1 /046		180	370	ND	ND	
DF/24A/ 0270/GR AB/022		4980	8390	ND	ND	
DF/24A/ 0270/GR AB/023		1980	2100	ND	ND	
DF/24A/ 0270/GR AB/024		3450	3760	ND	ND	
DF/24A/ 0270/GR AB/025		770	1300	ND	ND	
DF/24A/ 0270/GR AB/026		1660	1630	ND	ND	
DF/24A/ 0270/GR AB/027		43620	60320	ND	ND	

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CLEARANCE REPORT

SEP 27, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Wyatt McNutt

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0271/SD C/004		ND	ND	N/A	ND	
DF/24A/ 0271/SD C/005		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 27, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Wyatt McNutt

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0271/GR AB/031		1490	1530	ND	ND	
DF/24A/ 0271/GR AB/032		2230	3240	ND	ND	
DF/24A/ 0271/GR AB/033		5800	11850	ND	ND	
DF/24A/ 0271/T1 /048		2950	5960	ND	ND	
DF/24A/ 0271/SD C/004		ND	ND	ND	ND	
DF/24A/ 0271/SD C/005		ND	ND	ND	ND	
DF/24A/ 0271/GR AB/034		25330	38270	ND	ND	
DF/24A/ 0271/GR AB/035		18630	31960	ND	ND	
DF/24A/ 0271/GR AB/036		5080	3590	ND	ND	
DF/24A/ 0271/T2 /049		4110	6920	ND	ND	
DF/24A/ 0271/GR AB/037		20200	28380	ND	ND	
DF/24A/ 0271/T1 /050		680	3090	ND	ND	

[illegible]

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 14, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4-Thioxane	1,4-Dithiane	TDG	Mustard	
DF/24A/ 0258/T1 /019		1594	2489	N/A	ND	
DF/24A/ 0258/T1 /019 DUP		1607	2489	N/A	ND	
DF/24A/ 0258/T1 /020		ND	ND	N/A	ND	
DF/24A/ 0258/T2 /021		ND	ND	N/A	ND	
DF/24A/ 0258/T1 022		ND	ND	N/A	ND	
DF/24A/ 0258/T2 023		ND	ND	N/A	ND	
DF/24A/ 0258/T1 024		50	85	N/A	ND	
DF/24A/ 0258/T1 /024 DUP		50	84	N/A	ND	
DF/24A/ 0258/T2 /025		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

SEP 13, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Christopher Druyor

Sample#		1,4-Thioxane	1,4-Dithiane	TDG	Mustard	
DF/24A/ 0257/T2 /015		ND	ND	N/A	ND	
DF/24A/ 0257/T1 /016		ND	ND	N/A	ND	
DF/24A/ 0257/T2 A /017	un	ND	ND	N/A	ND	
DF/24A/ 0257/T2 B /018	un	ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM

Monitoring Branch Laboratory

CLEARANCE REPORT

OCT 12, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Steve Carter

Sample#		1,4-Thioxane	1,4-Dithiane	TDG	Mustard	
DF/24A/ 0285/ T1/056		ND	ND	N/A	ND	
DF/24A/ 0286/ T2/057		BDL	520	N/A	ND	
DF/24A/ 0286/ T2/058		420	1290	N/A	ND	
		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

OCT 13, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Steve Carter

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0286/ T2/059		1510	3970	N/A	ND	
DF/24A/ 0286/ T2/059 DUP		3980	520	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

OCT 16, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: ELWYN CHADWICK

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/0290 /T-1/060		240	1200	N/A	ND	
DF/24A/0290 /T-2/061		2390	4340	N/A	ND	
DF/24A/0290 /T-2/061 DUP		3030	5410	N/A	ND	
DF/24A/0290 /T-2/061 MS		3330 *	4970 *	N/A	770 85%	
DF/24A/0290 /T-2/061 MSD		2790 *	4710 *	N/A	830 91%	
DF/24A/0290 /GRAB/043		24890	52980	N/A	ND	
DF/24A/0290 /GRAB/044		11110	46510	N/A	ND	
DF/24A/0290 /GRAB/045		1260	2730	N/A	ND	
DF/24A/0290 /GRAB/046		1670	10190	N/A	ND	
DF/24A/0290 /GRAB/047		1750	5540	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

* = Matrix Spike % recoveries for these compounds not possible due to large amount of these compounds already present in the matrix.

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

17 OCT, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: ELWYN CHADWICK

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/ 0290/T-1/062		3310	6810	N/A	ND	
DF/24A/0291 /T-2/063		3790	7730	N/A	ND	
DF/24A/0291 /T-2/063 DUP		3270	6710	N/A	ND	
DF/24A/0291 /GRAB/049		ND	ND	N/A	ND	
DF/24A/0291 /GRAB/050		ND	ND	N/A	ND	
DF/24A/0291 /GRAB/051		ND	ND	N/A	ND	
DF/24A/0291 /GRAB/052		ND	ND	N/A	ND	
DF/24A/0291 /GRAB/053		ND	ND	N/A	ND	
DF/24A/0291 /GRAB/054		ND	ND	N/A	ND	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

N/A = Not analyzed

N/A = Not analyzed

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

19 OCT, 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: ELWYN CHADWICK

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard	
DF/24A/0293/ CVS/001		ND	ND	N/A	ND	
DF/24A/0293/ CVS/002		270	1090	N/A	ND	
DF/24A/0293/ CVS/002 DUP		260	1070	N/A	ND	
DF/24A/0293/ CVS/003		ND	ND	N/A	ND	
DF/24A/0293/ CVS/004		2880	14850	N/A	ND	
DF/24A/0293/ CVS/005		ND	ND	N/A	ND	
DF/24A/0293/ CVS/006		ND	ND	N/A	ND	
DF/24A/0293/ CVS/007		ND	ND	N/A	ND	
DF/24A/0293/ CVS/005 MS		990 101%	950 100%	N/A	900 99%	
DF/24A/0293/ CVS/005 MSD		970 99%	940 99%	N/A	890 98%	

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

N/A = Not analyzed

N/A = Not analyzed

ND= Not detected at or above the method detection limit (MDL)
MDL= 200 ppb
BDL= Below detection limit, results > 100ppb, but < 200 ppb
MS= matrix spike
MSD= matrix spike duplicate
DUP= duplicate
N/A = Not analyzed

SBCCOM
Monitoring Branch Laboratory

CLEARANCE REPORT

8 NOV 2000

Dunn Field, Memphis Defense Depot

Results for CWM Soil Sample Analysis

Analyst: Elwyn Chadwick

Sample#		1,4- Thioxane	1,4- Dithiane	TDG	Mustard
DF/24A/0313 T-2/084		880	1540	NA	ND

ND= Not detected at or above the method detection limit (MDL)

MDL= 200 ppb

BDL= Below detection limit, results > 100ppb, but < 200 ppb

MS= matrix spike

MSD= matrix spike duplicate

DUP= duplicate

N/A = Not analyzed

N/A = Not analyzed

N/A = Not analyzed

Dunn Field, Memphis Defense Depot
Results for CWM Soil Sample Analysis
Analyst: Chris Druyor

ND= Not detected at or above the method detection limit (MDL)
MDL= 200 ppb
BDL= Below detection limit, results > 100ppb, but < 200 ppb
MS= matrix spike
MSD= matrix spike duplicate
DUP= duplicate
N/A = Not analyzed

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-17**Field ID : **DF/24-A/1026/R/017**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/02/01	01/30/01	TL 1311 LS 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	122	74 123
S2 - Toluene-d8	104	86 112
S3 - 4-Bromofluorobenzene	106	81 115
S4 - 1,2-Dichloroethane-d4	123 Q	80 120



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 481



ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road • Memphis, TN 38111 • (901) 327-2750 • FAX (901) 327-6334

Founded 1972

February 1, 2001

Mr Jerry Girardea
Innovative Waste Management
P.O. Box 50397
Summerville, SC 29485-0397

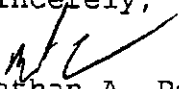
Ref: Analytical Testing
ETC Order # 0101689
Project Description Dunn Field
Memphis, TN

The above referenced project has been analyzed per your instructions. The analyses were performed in our laboratory in accordance with Standard Methods, The Solid Waste Manual SW-846, EPA Methods for Chemical Analysis of Water and Wastes and/or 40 CFR part 136.

The results are shown on the attached analysis sheet(s).

Please do not hesitate to contact our office if you have any questions.

Sincerely,


Nathan A. Pera, IV
Chief Executive Officer

rt
Attachment

INNOVWASTE

Certifications

Tennessee #TN02027
Arkansas #40730
Kentucky #90047
North Carolina #415
South Carolina #84002002

Mississippi
Oklahoma #9311
Virginia #00106
Washington #C248
US Army Corps of Engineers



CHAIN OF CUSTODY RECORD

Environmental Testing & Consulting, Inc.

2924 Walnut Grove Rd.

Memphis, TN 38111

(901)327-2750 FAX (901)327-6334

ETC Work Order : 0101689

654

482

Company Name		Phone # : (901) 574-4999		Fax Results									
Project/Site		Fax # : (901) 745-		RUSH									
Project #		FID # :		Ice									
Project Manager/Contact		PO # :											
Chris Rose / Jim Dunkle		Matrix		1 Wastewater									
		2 Aqueous		4 Sludge									
		3 Soil/Sediment		5 Oil/Solvent									
				6 Other									
# of cont.	Sample ID/ Number	Depth	Sample Date	Sample Time	Matrix	Type	Grab/Comp	Analysis Requested					
1	DE/24-A/1026/R/01		01/24/01	1400	3	Comp		(Note special detection limits or methods)					
1	DE/24-A/1026/R/02		01/24/01	1400	3	Comp		TCLP Metals					
1	DE/24-A/1026/R/03		01/24/01	1400	3	Comp		VOC					
1	DE/24-A/1026/R/04		01/24/01	1400	3	Comp		SVOCs					
1	DE/24-A/1026/R/05		01/24/01	1400	3	Comp							
1	DE/24-A/1026/R/06		01/24/01	1400	3	Comp							
1	DE/24-A/1026/R/07		01/24/01	1400	3	Comp							
1	DE/24-A/1026/R/08		01/24/01	1400	3	Comp							
1	DE/24-A/1026/R/09		01/24/01	1400	3	Comp							
1	DE/24-A/1026/R/10		01/24/01	1400	3	Comp							
1	DE/24-A/1026/R/11		01/24/01	1400	3	Comp							
Sampled By		Method of Shipment		Blank/Cooler Temp		Remarks							
Chris Rose		Auto											
REINQUISHED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME		Sample Delivery Group ID	
Chris Rose		01/24/01		1605				01/24/01		1605			
REINQUISHED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME			
REINQUISHED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME			

Distribution : Original and Yellow accompany samples to the laboratory. Pink copy for Field Crew.
Original copy returned with results. Yellow copy for ETC, Inc files.



CHAIN OF CUSTODY RECORD

Environmental Testing & Consulting, Inc.

2924 Walnut Grove Rd.

Memphis, TN 38111

(901)327-2750 FAX (901)327-6334

ETC Work Order : 0101689

654

483

Company Name		Phone # : (901) 745-4999		Fax Results														
Project/Site		Fax # : (901) 745-		RUSH														
Project #		FID # :		Ice														
Project Manager/Contact		PO # :																
		Matrix		4 Sludge														
		1 Wastewater		5 Oil/Solvent														
		2 Aqueous		6 Other														
		3 Soil/Sediment																
# of cont.	Sample ID/ Number	Depth	Sample Date	Sample Time	Matrix	Type	Grab/Comp	Analysis Requested (Note special detection limits or methods)								Comments		
1	DE/24-4/1026/12/12		10/26/01	14:15	3		COMP											
1	DE/24-4/1026/12/13		10/26/01	14:15	3		COMP											
1	DE/24-4/1026/12/14		10/26/01	14:15	3		COMP											
1	DE/24-4/1026/12/15		10/26/01	14:15	3		COMP											
1	DE/24-4/1026/12/16		10/26/01	14:15	3		COMP											
1	DE/24-4/1026/12/17		10/26/01	14:15	3		COMP											
1	DE/24-4/1026/12/18		10/26/01	14:15	3		COMP											
1	DE/24-4/1026/12/19		10/26/01	14:15	3		COMP											
Sampled By		Method of Shipment		Blank/Cooler Temp		Remarks												
RELINQUISHED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME		Sample Delivery Group ID
RELINQUISHED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME		
RELINQUISHED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME		RECEIVED BY (sign)		DATE		TIME		

654 484

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID : **0101689-01**
Field ID : **DF/24-A/1026/R/01**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.44	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

654 485

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field
Memphis, TN**

**P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID **0101689-01**

Field ID : **DF/24-A/1026/R/01**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/29/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	42	29 110
S2 - 2-Fluorobiphenyl	44	38 107
S3 - 4-Terphenyl-d14	52	33 122
S4 - Phenol-d6	12	7 58
S5 - 2,4,6-Tribromophenol	35	16 138
S6 - 2-Fluorophenol	20	8 88


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 486

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-01**Field ID : **DF/24-A/1026/R/01**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate				01/29/01	TL 1311
TCLP Volatile Organics				02/01/01	EM 8260B	5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	107	74 123
S2 - Toluene-d8	98	86 112
S3 - 4-Bromofluorobenzene	96	81 115
S4 - 1,2-Dichloroethane-d4	101	80 120


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 487

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

Date Arrived **01/29/01**

ETC Order Number **0101689**


ETC Lab ID : **0101689-02**

Field ID : **DF/24-A/1026/R/02**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED	BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL	1311
Silver - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Barium - TCLP	1.39	mg/L	0.025	01/31/01		SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01		JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B


Data Validator

ND - Not Detected

654 488

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID **0101689-02**

Field ID : **DF/24-A/1026/R/02**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/01/01	01/29/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits	
S1 - Dibromofluoromethane	104	74	123
S2 - Toluene-d8	99	86	112
S3 - 4-Bromofluorobenzene	97	81	115
S4 - 1,2-Dichloroethane-d4	102	80	120


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 489

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
 FID #

Date Arrived **01/29/01**
 ETC Order Number **0101689**

ETC Lab ID **0101689-02**
 Field ID : **DF/24-A/1026/R/02**

Matrix : **SOIL**
 Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate				RL	1311
TCLP Semivolatiles				02/01/01	PF	8270C
					01/31/01	3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			
Surrogate Standard	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	76		29	110		
S2 - 2-Fluorobiphenyl	78		38	107		
S3 - 4-Terphenyl-d14	100		33	122		
S4 - Phenol-d6	22		7	58		
S5 - 2,4,6-Tribromophenol	66		16	138		
S6 - 2-Fluorophenol	33		8	88		

①

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 490

ENVIRONMENTAL TESTING & CONSULTING, INC.
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397


Site ID **Dunn Field**
Memphis, TN

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID : **0101689-03**
Field ID : **DF/24-A/1026/R/03**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED	BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL	1311
Silver - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Barium - TCLP	0.731	mg/L	0.025	01/31/01		SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01		JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B


Data Validator

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 491

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-03**
Field ID : **DF/24-A/1026/R/03**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE TCLP Volatile Organics	Leachate			02/01/01	01/29/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits
S1 - Dibromofluoromethane	111	74 123
S2 - Toluene-d8	100	86 112
S3 - 4-Bromofluorobenzene	96	81 115
S4 - 1,2-Dichloroethane-d4	108	80 120

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 492

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

PID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-03**Field ID : **DF/24-A/1026/R/03**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate				01/29/01	RL 1311
TCLP Semivolatiles				02/01/01	PF 8270C	3510C
Dilution Factor	1				01/31/01	
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			
Surrogate Standard	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	79		29	110		
S2 - 2-Fluorobiphenyl	81		38	107		
S3 - 4-Terphenyl-d14	99		33	122		
S4 - Phenol-d6	22		7	58		
S5 - 2,4,6-Tribromophenol	68		16	138		
S6 - 2-Fluorophenol	36		8	88		

Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 493

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID : **0101689-04**
Field ID : **DF/24-A/1026/R/04**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	0.994	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

654 494

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID **0101689-04**

Field ID : **DF/24-A/1026/R/04**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate				01/29/01	TL 1311
TCLP Volatile Organics				02/01/01	EM	8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits	
S1 - Dibromofluoromethane	107	74	123
S2 - Toluene-d8	102	86	112
S3 - 4-Bromofluorobenzene	98	81	115
S4 - 1,2-Dichloroethane-d4	95	80	120


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 495

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field
Memphis, TN**

**P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID **0101689-04**

Field ID : **DF/24-A/1026/R/04**

Matrix : **SOIL**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/29/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	75	29 110
S2 - 2-Fluorobiphenyl	78	38 107
S3 - 4-Terphenyl-d14	98	33 122
S4 - Phenol-d6	22	7 58
S5 - 2,4,6-Tribromophenol	64	16 138
S6 - 2-Fluorophenol	34	8 88



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 496

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**

Site ID **Dunn Field**
Memphis, TN

P.O. Box 50397
Summerville, SC 29485-0397

Date Arrived **01/29/01**

ETC Order Number **0101689**

ETC Lab ID : **0101689-06**

Matrix : **SOIL**

Field ID : **DF/24-A/1026/R/06**

Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.48	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

654 497

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
FID #

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID **0101689-06**
Field ID : **DF/24-A/1026/R/06**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE TCLP Volatile Organics	Leachate			02/01/01	01/29/01 TL EM	1311 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			

Surrogate Standard	% Recovery	QC Limits	
S1 - Dibromofluoromethane	104	74	123
S2 - Toluene-d8	96	86	112
S3 - 4-Bromofluorobenzene	98	81	115
S4 - 1,2-Dichloroethane-d4	102	80	120


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 498

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN**P.O. Box 50397
Summerville, SC 29485-0397

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-06**Field ID : **DF/24-A/1026/R/06**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/29/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			

Surrogate Standard	% Recovery	QC Limits
S1 - Nitrobenzene-d5	68	29 110
S2 - 2-Fluorobiphenyl	70	38 107
S3 - 4-Terphenyl-d14	93	33 122
S4 - Phenol-d6	22	7 58
S5 - 2,4,6-Tribromophenol	60	16 138
S6 - 2-Fluorophenol	34	8 88


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 499

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID : **0101689-07**
Field ID : **DF/24-A/1026/R/07**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED	BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL	1311
Silver - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Barium - TCLP	1.31	mg/L	0.025	01/31/01		SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01		SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01		JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01		SH	6010B


Data Validator

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654 500

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-07**Field ID : **DF/24-A/1026/R/07**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE TCLP Volatile Organics	Leachate			02/01/01	01/29/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			
Surrogate Standard	% Recovery		QC Limits			
S1 - Dibromofluoromethane	111		74 123			
S2 - Toluene-d8	97		86 112			
S3 - 4-Bromofluorobenzene	96		81 115			
S4 - 1,2-Dichloroethane-d4	106		80 120			


Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 501

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**Site ID **Dunn Field
Memphis, TN****P.O. Box 50397
Summerville, SC 29485-0397**

FID #

Date Arrived **01/29/01**ETC Order Number **0101689**ETC Lab ID **0101689-07**Field ID : **DF/24-A/1026/R/07**Matrix : **SOIL**Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction Organics	Leachate					
TCLP Semivolatiles				02/01/01	01/29/01 01/31/01	RL 1311 PF 8270C 3510C
Dilution Factor	1					
1,4-Dichlorobenzene	ND	mg/L	0.020			
2,4-Dinitrotoluene	ND	mg/L	0.020			
Hexachlorobenzene	ND	mg/L	0.020			
Hexachlorobutadiene	ND	mg/L	0.020			
Hexachloroethane	ND	mg/L	0.020			
2-Methylphenol	ND	mg/L	0.020			
3-Methylphenol	ND	mg/L	0.020			
4-Methylphenol	ND	mg/L	0.020			
Nitrobenzene	ND	mg/L	0.020			
Pentachlorophenol	ND	mg/L	0.040			
Pyridine	ND	mg/L	0.020			
2,4,5-Trichlorophenol	ND	mg/L	0.020			
2,4,6-Trichlorophenol	ND	mg/L	0.020			
Surrogate Standard	% Recovery		QC Limits			
S1 - Nitrobenzene-d5	74		29	110		
S2 - 2-Fluorobiphenyl	76		38	107		
S3 - 4-Terphenyl-d14	96		33	122		
S4 - Phenol-d6	22		7	58		
S5 - 2,4,6-Tribromophenol	67		16	138		
S6 - 2-Fluorophenol	35		8	88		



Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

654 502

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

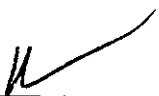
Site ID **Dunn Field**
Memphis, TN

Date Arrived **01/29/01**
ETC Order Number **0101689**

ETC Lab ID : **0101689-08**
Field ID : **DF/24-A/1026/R/08**

Matrix : **SOIL**
Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE PREPARED BY	METHOD
TCLP Extraction	Leachate				01/29/01	TL 1311
Silver - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Arsenic - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Barium - TCLP	1.03	mg/L	0.025	01/31/01	SH	6010B
Cadmium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Chromium - TCLP	ND	mg/L	0.010	01/31/01	SH	6010B
Mercury - TCLP	ND	mg/L	0.001	01/31/01	JF	7470A
Lead - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B
Selenium - TCLP	ND	mg/L	0.100	01/31/01	SH	6010B


Data Validator

ND - Not Detected

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

654

503

Client Name **Innovative Waste Management**
P.O. Box 50397
Summerville, SC 29485-0397

Site ID **Dunn Field**
Memphis, TN
 FID #

Date Arrived **01/29/01**
 ETC Order Number **0101689**

ETC Lab ID **0101689-08**
 Field ID : **DF/24-A/1026/R/08**

Matrix : **SOIL**
 Sample Date : **01/26/01**

TEST	RESULT	UNITS	DETECTION LIMIT	DATE ANALYZED	DATE EXTRACTED BY	METHOD
TCLP Extraction ZHE	Leachate					
TCLP Volatile Organics				02/01/01	01/29/01	TL 1311 EM 8260B 5030B
Dilution Factor	10					
Benzene	ND	mg/L	0.010			
Carbon Tetrachloride	ND	mg/L	0.010			
Chlorobenzene	ND	mg/L	0.010			
Chloroform	ND	mg/L	0.010			
1,4-Dichlorobenzene	ND	mg/L	0.010			
1,2-Dichloroethane	ND	mg/L	0.010			
1,1-Dichloroethene	ND	mg/L	0.010			
2-Butanone (MEK)	ND	mg/L	1.00			
Tetrachloroethene	ND	mg/L	0.010			
Trichloroethene	ND	mg/L	0.010			
Vinyl Chloride	ND	mg/L	0.010			
Surrogate Standard	% Recovery		QC Limits			
S1 - Dibromofluoromethane	112		74	123		
S2 - Toluene-d8	98		86	112		
S3 - 4-Bromofluorobenzene	97		81	115		
S4 - 1,2-Dichloroethane-d4	106		80	120		


 Data Validator

ND - Not Detected

Q - Recovery Outside QC Limits

POLLUTION CONTROL INDUSTRIES

654 504

4343 KENNEDY AVENUE
EAST CHICAGO, INDIANA 46312
(219) 397-3951

PICK-UP DATE	TIME	DELIVER DATE	TIME	TYPE TRAILER	HOSE AMT. TYPE	PUMP	MANIFEST NUMBER	CUSTOMER NUMBER	
12/6/00		12/6/00		Roll off	N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	12600	651330	
DRIVER		TRUCK NO.		TRAILER NO.		ORDER NO.		MILES ONE WAY	
Bannon		52		PC003		9076			
					MILES STATE BY STATE				

SHIPPER	ORIGIN	AUTHORITY TO UNLOAD
D & S Logistics Agency Memphis, TN CONSIGNEE Pollution Control Ind. Millington, TN	RECEIVED IN GOOD CONDITION BY: X _____	MUST BE SIGNED BEFORE UNLOADING TO INSURE PROPER DELIVERY PLEASE CHECK THAT THE PRODUCT DESCRIBED ON THE BILL OF LADING IS THE TYPE AND AMOUNT YOU EXPECTED, THAT THE DRIVER IS HOOKED UP TO THE PROPER TANK WITH ROOM FOR THE AMOUNT OF PRODUCT DESCRIBED ON THE ORDER AND THAT CONNECTIONS AND PLANT VALVES ARE PROPERLY POSITIONED TO ACCEPT THE LOAD I HAVE CHECKED AND THE PC DRIVER IS SET UP CORRECTLY AND HE IS AUTHORIZED TO UNLOAD DATE _____ A M _____ P M X _____ CONSIGNEE'S AGENT

LOADING REPORT		EXPLAIN EXCESS OF 1 HR OR SPECIFIC	LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (BE SPECIFIC)
SPATCH TIME	A.M. P.M. 12:00		DEST ARRIVED	A.M. P.M.	
ORIGIN ARRIVED	A.M. P.M. 1Pm		STARTED	A.M. P.M.	
STARTED	A.M. P.M. 108		FINISHED	A.M. P.M.	
FINISHED	A.M. P.M. 1:20		END TERMINAL	A.M. P.M.	
TOTAL TIME	A.M. P.M.	SHIPPER'S SIGNATURE X _____	TOTAL TIME	A.M. P.M.	CONSIGNEE'S SIGNATURE X _____
DRIVER NO. TERM		DRIVER NO. TERM			
DATE TRACTOR TRAILER		DATE TRACTOR TRAILER			

ITEM	COMMODITY	RATE	UNIT	TOTAL	GROSS	WEIGHT
					TARE	
					NET	

REMARKS: _____

654 505

Please print or type
(Form designed for use on elite (12 pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No T N 4 2 1 0 0 2 0 5 7 0	Manifest Doc No 1	2. Page 1 of 1
3. Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114				
4. Generator's Phone ()				
5. Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.		6. US EPA ID Number I M D O O 0 6 4 6 9 4 3	A. Transporter's Phone (901) 353-5291	
7. Transporter 2 Company Name		8. US EPA ID Number	B. Transporter's Phone	
9. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10. US EPA ID Number T N D O O 0 7 7 2 1 8 6	C. Facility's Phone (901) 353-5291	
11. Waste Shipping Name and Description			12. Containers No	13. Total Quantity
a. NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL				
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS			E. Handling Codes for Wastes Listed Above	
15. Special Handling Instructions and Additional Information 24 hour emergency phone #: 1 800-851-8061 Trailer #: Land Ban Letter Attached Seal #:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name		Signature		Month Day Year
				12 12 98
17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name <i>Joseph P. Barron</i>		Signature <i>Joseph P. Barron</i>		Month Day Year 12 12 98
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space				
20. Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in Item 19				
Printed/Typed Name		Signature		Month Day Year

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location: Defense Logistic Agency, 2163 Airways Blvd., Memphis, TN 38114

EPA ID Number: TN4210020570 Manifest Number: 12601

Waste Analysis Available ☒ YES ☐ NO ☒ On File at Facility Date: 12/6/00

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP (Please check the applicable treatability group)		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
a	b	c	d	Non-wastewater >1% TOC & >1% TSS	Wastewater	List all applicable constituents from key below	List all applicable constituents from Table I and/or key below
206154	X			e	f	g	h

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (Tl) > = 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify, under penalty of law, that the above information is accurate and true.

Signature Chris Rose Printed Name CHRIS ROSE

654 506

POLLUTION CONTROL INDUSTRIES

654 507

4343 KENNEDY AVENUE
EAST CHICAGO, INDIANA 46312
(219) 397-3951

PICK-UP DATE	TIME	DELIVER DATE	TIME	TYPE TRAILER	HOSE AMT.	PUMP TYPE	MANIFEST NUMBER	CUSTOMER NUMBER
12/6/00				Roll-off	N/A	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	12601	
DRIVER	TRUCK NO.	TRAILER NO.	ORDER NO.	MILES ONE WAY	MILES STATE BY STATE			
Bannon	52	PI003						

SHIPPER	ORIGIN	AUTHORITY TO UNLOAD
Defense Logistics Memphis, TN CONSIGNEE Pollution Control Ind. Millington, TN	RECEIVED IN GOOD CONDITION BY X _____	<p><small>MUST BE SIGNED BEFORE UNLOADING</small></p> <p><small>TO INSURE PROPER DELIVERY, PLEASE CHECK THAT THE PRODUCT DESCRIBED ON THE BILL OF LADING IS THE TYPE AND AMOUNT YOU EXPECTED. THAT THE DRIVER IS HOOKED UP TO THE PROPER TANK WITH ROOM FOR THE AMOUNT OF PRODUCT DESCRIBED ON THE ORDER AND THAT CONNECTIONS AND PLANT VALVES ARE PROPERLY POSITIONED TO ACCEPT THE LOAD.</small></p> <p><small>I HAVE CHECKED AND THE PCI DRIVER IS SET UP CORRECTLY AND HE IS AUTHORIZED TO UNLOAD.</small></p> <p>DATE _____ 19__ A M P M</p> <p>X _____ CONSIGNEE'S AGENT</p>

LOADING REPORT		EXPLAIN EXCESS OF 1 HR (BE SPECIFIC)	LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (BE SPECIFIC)
SPATCH TIME	A M P M 3:15		DEST ARRIVED	A M P M	
ORIGIN ARRIVED	A M P M 4:30		STARTED	A M P M	
STARTED	A M P M 4:35		FINISHED	A M P M	
FINISHED	A M P M 4:45		END TERMINAL	A M P M	
TOTAL TIME	A M P M	SHIPPER'S SIGNATURE X _____	TOTAL TIME	A M P M	CONSIGNEE'S SIGNATURE X _____
DRIVER NO TERM		DRIVER NO TERM			
DATE TRACTOR TRAILER		DATE TRACTOR TRAILER			

ITEM	COMMODITY	RATE	UNIT	TOTAL	WEIGHT
					GROSS
					TARE
					NET

REMARKS: _____

654 508

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN 4-2-1 0 0 2 0 5 7 0	Manifest Doc No 1-2700	2. Page 1 of 1
3. Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114				
4. Generator's Phone ()				
5. Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.	6. US EPA ID Number IND-000-646943	A. Transporter's Phone (901) 353-5291		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter's Phone		
9. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10. US EPA ID Number IND-000-772186	C. Facility's Phone (901) 353-5291	
11. Waste Shipping Name and Description		12. Containers No	Type	13. Total Quantity
a. NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL				
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS		E. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information 24 hour emergency phone #: 901-544-0612 Trailer #: 898 Land Ban Letter Attached Seal #: NA 1 800-851-8061				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste				
Printed/Typed Name		Signature		Month Day Year
				12 7 00
17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
JOSEPH P BANNON		JOSEPH P BANNON		12 07 00
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space				
20. Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in Item 19				
Printed/Typed Name		Signature		Month Day Year

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

654 509

Generator Name/Location: Defense Logistic Agency, 2163 Airways Blvd., Memphis, TN 38114

EPA ID Number: TN4210020570 Manifest Number: 12700

Waste Analysis Available ☒ YES ☐ NO ☒ On File at Facility Date: 12/07/00

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP (Please check the applicable treatability group)	CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
a	b	c	d	Non-wastewater >1% TOC & > 1% TSS e	Wastewater f	List all applicable constituents from Table I and/or key below h
206154	X					

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm
2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l
3) Nickel (Ni) > = 134 mg/l
4) Thallium (Tl) > = 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify, under penalty of law, that the above information is accurate and true.

Signature Chris Rose Printed Name CHRIS ROSE

POLLUTION CONTROL INDUSTRIES

4343 KENNEDY AVENUE
EAST CHICAGO, INDIANA 46312
(219) 397-3951

654 510

PICK-UP DATE	TIME	DELIVER DATE	TIME	TYPE TRAILER	HOSE AMT. TYPE	PUMP	MANIFEST NUMBER	CUSTOMER NUMBER
12/7/00	11:00 AM			Roll off	N/A	YES <input checked="" type="checkbox"/> NO	12700	651330
DRIVER	TRUCK NO.	TRAILER NO.	ORDER NO.	MILES ONE WAY	MILES STATE BY STATE			
Bannon	52	MS-003	9075					

SHIPPER	ORIGIN	AUTHORITY TO UNLOAD
Defense Logistic Agency Memphis, TN CONSIGNEE Pollution Control Industries M. Livingston, TN	RECEIVED IN GOOD CONDITION BY: X	MUST BE SIGNED BEFORE UNLOADING TO INSURE PROPER DELIVERY PLEASE CHECK THAT THE PRODUCT DESCRIBED ON THE BILL OF LADING IS THE TYPE AND AMOUNT YOU EXPECTED, THAT THE DRIVER IS HOOKED UP TO THE PROPER TANK WITH ROOM FOR THE AMOUNT OF PRODUCT DESCRIBED ON THE ORDER, AND THAT CONNECTIONS AND PLANT VALVES ARE PROPERLY POSITIONED TO ACCEPT THE LOAD. I HAVE CHECKED AND THE PCS DRIVER IS SET UP CORRECTLY AND HE IS AUTHORIZED TO UNLOAD. DATE _____ IS _____ A.M. X _____ CONSIGNEE'S AGENT

LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (BE SPECIFIC)	LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (BE SPECIFIC)
DEPART TIME	A.M. P.M. 10:00		DEST ARRIVED	A.M. P.M.	
ORIGIN ARRIVED	A.M. P.M. 10:45		STARTED	A.M. P.M.	
STARTED	A.M. P.M. 10:47		FINISHED	A.M. P.M.	
FINISHED	A.M. P.M. 11:00		END TERMINAL	A.M. P.M.	
TOTAL TIME	A.M. P.M.	SHIPPER'S SIGNATURE X <i>Chris Rose</i>	TOTAL TIME	A.M. P.M.	CONSIGNEE'S SIGNATURE X
DRIVER	NO.	TERM	DRIVER	NO.	TERM
DATE	TRACTOR	TRAILER	DATE	TRACTOR	TRAILER

ITEM	COMMODITY	RATE	UNIT	TOTAL	WEIGHT
					GROSS
					TARE
					NET

REMARKS: Profile 206154: 1-Roll off

654 511

Printed/Typed Name
(Form designed to be filled on site (12-pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No T N 4 2 1 0 0 2 0 5 7 0	Manifest Doc No. 12701	2 Page 1 of 1	
3 Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114					
4 Generator's Phone ()					
5 Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.		6. US EPA ID Number I N D 0 0 0 6 4 6 9 4 3	A. Transporter's Phone (901) 353-5291		
7. Transporter 2 Company Name		8 US EPA ID Number	B Transporter's Phone		
9 Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10. US EPA ID Number T N D 0 0 0 7 7 2 1 8 6	C Facility's Phone (901) 353-5291		
11 Waste Shipping Name and Description		12 Containers No.	Type	13. Total Quantity	14 Unit Wt/Vol
a NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL					
b.					
c					
d					
D Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS		E. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information 24 hour emergency phone #: 1800 851-8061 Trailer #: ARP 304 Land Ban Letter Attached Seal #: NA					
16 GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste					
Printed/Typed Name Chris Rose		Signature <i>Chris Rose</i>		Month	Day Year
17 Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Joseph P Barron</i>		Month	Day Year
Printed/Typed Name JOSEPH P BARRON				12	0700
18 Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month	Day Year
Printed/Typed Name					
19 Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19					
Printed/Typed Name		Signature		Month	Day Year

LAND DISPOSAL RESTRICTIONS NOTIFICATION FORM 1

Generator Name/Location: Defense Logistic Agency, 2163 Airways Blvd., Memphis, TN 38114

EPA ID Number: TN4210020570

Manifest Number: 12701

Waste Analysis Available X YES NO X On File at Facility Date: 12/7/08

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP (Please check the applicable treatability group)	CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
a	b	c	d	Non-wastewater >1% TOC & > 1% TSS e	Wastewater f	List all applicable constituents from Table I and/or key below g
206154	X					List all applicable constituents from Table I and/or key below h

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (Tl) > = 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify, under penalty of law, that the above information is accurate and true.

Signature Chris Rose

Printed Name Chris Rose

POLLUTION CONTROL INDUSTRIES

4343 KENNEDY AVENUE
EAST CHICAGO, INDIANA 46312
(219) 397-3951

654 513

PICK-UP DATE	TIME	DELIVER DATE	TIME	TYPE TRAILER	HOSE AMT.	TYPE	PUMP	MANIFEST NUMBER	CUSTOMER NUMBER
12/7/00	8:00 AM			Roll off	N/A		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	12701	651330
DRIVER		TRUCK NO.		TRAILER NO.	ORDER NO.		MILES ONE WAY	MILES STATE BY STATE	
Benson		52		PCI-003	9074				

SHIPPER	ORIGIN	AUTHORITY TO UNLOAD
Delpine Logistics Agency Memphis, TN CONSIGNEE		<p><small>MUST BE SIGNED BEFORE UNLOADING</small></p> <p><small>TO INSURE PROPER DELIVERY, PLEASE CHECK THAT THE PRODUCT DESCRIBED ON THE BILL OF LADING IS THE TYPE AND AMOUNT YOU EXPECTED. THAT THE DRIVER IS BOOKED UP TO THE PROPER TANK WITH ROOM FOR THE AMOUNT OF PRODUCT DESCRIBED ON THE ORDER, AND THAT CONNECTIONS AND PLANT VALVES ARE PROPERLY POSITIONED TO ACCEPT THE LOAD</small></p> <p><small>I HAVE CHECKED AND THE PCI DRIVER IS SET UP CORRECTLY AND HE IS AUTHORIZED TO UNLOAD</small></p> <p>DATE _____ IS _____ A M P M</p> <p>X _____ CONSIGNEE'S AGENT</p>
Pollution Control Ind.	RECEIVED IN GOOD CONDITION	
N. H. Houston, TN		
	BY: X _____	

LOADING REPORT		EXPLAIN EXCESS OF 1 HR (BE SPECIFIC)	LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (BE SPECIFIC)
PATCH TIME	A M P M		DEST. ARRIVED	A M P M	
ORIGIN ARRIVED	12:30		STARTED	A M P M	
STARTED	12:35		FINISHED	A M P M	
FINISHED	12:45		END TERMINAL	A M P M	
TOTAL TIME	A M P M	SHIPPER'S SIGNATURE X _____	TOTAL TIME	A M P M	CONSIGNEE'S SIGNATURE X _____
DRIVER NO. TERM		DRIVER NO. TERM			
DATE TRACTOR TRAILER		DATE TRACTOR TRAILER			

ITEM	COMMODITY	RATE	UNIT	TOTAL		WEIGHT
					GROSS	
					TARE	
					NET	

REMARKS: Prof. 1st: 206154- 1- Roll off

654 514

Please print or type
(Form designed for use on elite (12-pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No T N 4 2 1 0 0 2 0 5 7 0	Manifest Doc No 12120	2 Page 1 of 1
3 Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114				
4 Generator's Phone ()				
5 Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.		6 US EPA ID Number I N D 0 0 0 6 4 6 9 4 3	A Transporter's Phone (901) 353-5291	
7 Transporter 2 Company Name		8 US EPA ID Number	B. Transporter's Phone	
9 Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10 US EPA ID Number T N D 0 0 0 7 7 2 1 8 6	C Facility's Phone (901) 353-5291	
11. Waste Shipping Name and Description			12. Containers No Type	13 Total Quantity
a NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL				
b				
c				
d				
D Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS			E Handling Codes for Wastes Listed Above	
15. Special Handling Instructions and Additional Information 24 hour emergency phone #: 206 351 2001 Land Ban Letter Attached Trailer #: 2601 Seal #: NA				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name C. H. R. L. R. D. E		Signature <i>C. H. R. L. R. D. E</i>		Month Day Year 12 12 2000
17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name JOSEPH P BANNON		Signature <i>Joseph P Bannon</i>		Month Day Year 12 12 2000
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
19 Discrepancy Indication Space				
20 Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name		Signature		Month Day Year

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location

Defense Logistics Agency / Memphis, TN

EPA ID Number

TN4210020570

Manifest Number

4242702-14A 12120

Waste Analysis Available

✓

Yes

No

On file at facility

Date

12/12/00

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
				Nonwastewater > 1% TOC & > 1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table I and/or key below h
a	b	c	d				
206154	✓						

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (TI) > = 130 mg

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature

Chaim Kark

Print Name

CHAIM KARK

POLLUTION CONTROL INDUSTRIES 654 516
 4343 KENNEDY AVENUE
 EAST CHICAGO, INDIANA 46312
 (219) 397-3951

BEST AVAILABLE COPY

PICK-UP DATE	TIME	DELIVER DATE	TIME	TYPE TRAILER	ROSE AMT. TYPE	PUMP YES NO	MANIFEST NUMBER	CUSTOMER NUMBER
12/12/00				ROLL-OFF	NA	<input checked="" type="checkbox"/>	12-12-0	
DRIVER	TRUCK NO.	TRAILER NO.	ORDER NO.	MILES ONE WAY	MILES STATE BY STATE			
BANNON	52	PCI 003						

SHIPPER	ORIGIN	AUTHORITY TO UNLOAD
DEFENSE LOGISTICS AGENCY MEMPHIS TN CONSIGNEE	RECEIVED IN GOOD CONDITION	MUST BE SIGNED BEFORE UNLOADING TO INSURE PROPER DELIVERY PLEASE CHECK THAT THE PRODUCT DESCRIBED ON THE BILL OF LADING IS THE TYPE AND AMOUNT YOU EXPECTED THAT THE DRIVER IS HOOKED UP TO THE PROPER TANK WITH ROOM FOR THE AMOUNT OF PRODUCT DESCRIBED ON THE ORDER, AND THAT CONNECTIONS AND PLANT VALVES ARE PROPERLY POSITIONED TO ACCEPT THE LOAD I HAVE CHECKED AND THE PCI DRIVER IS SET UP CORRECTLY AND HE IS AUTHORIZED TO UNLOAD DATE _____ A M P M X _____ CONSIGNEE'S AGENT
PCI MILLINGTON TN	BY: X _____	

LOADING REPORT		EXPLAIN EXCESS OF 1 HR (BE SPECIFIC)	LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (BE SPECIFIC)
PATCH TIME	A.M. P.M.		DEST ARRIVED	A M P M.	
ORIGIN ARRIVED	A.M. P.M.		STARTED	A M P M.	
STARTED	A.M. P.M.		FINISHED	A M P M.	
FINISHED	A.M. P.M.		END TERMINAL	A M. P M.	
TOTAL TIME	A M P.M.	SHIPPER'S SIGNATURE X _____	TOTAL TIME	A M P M.	CONSIGNEE'S SIGNATURE X _____
DRIVER BANNON	NO.	TERM	DRIVER	NO	TERM
DATE 12-12-00	TRACTOR 52	TRAILER PCI 003	DATE	TRACTOR	TRAILER
ITEM	COMMODITY	RATE	UNIT	TOTAL	WEIGHT
					GROSS
					TARE
					NET

REMARKS:

654 517

Please print or type
(Form designed for use on ellipse (12 pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No. T N 4 2 1 0 0 2 0 5 7 0	Manifest Doc No 12121	2 Page 1 of 1
3. Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114				
4 Generator's Phone ()				
5. Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.		6 US EPA ID Number I N D 0 0 0 6 4 6 9 4 3	A Transporter's Phone (901) 353-5291	
7 Transporter 2 Company Name		8 US EPA ID Number	B Transporter's Phone	
9 Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10 US EPA ID Number I N D 0 0 0 7 7 2 1 8 6	C. Facility's Phone (901) 353-5291	
11 Waste Shipping Name and Description			12 Containers No.	13 Total Quantity
a NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL				
b.				
c.				
d.				
D Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS			E. Handling Codes for Wastes Listed Above	
15. Special Handling Instructions and Additional Information 24 hour emergency phone #: 1-800-271-2021 Land Ban Letter Attached				
Trailer #: 7403 Seal #: NA				
16 GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste				
Printed/Typed Name J. T. B...		Signature <i>[Signature]</i>		Month Day Year 12 12 12
17 Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name JOSEPH P BANHAM		Signature <i>[Signature]</i>		Month Day Year 12 12 12
18 Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space				
20 Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in Item 19				
Printed/Typed Name		Signature		Month Day Year

12/12/00

Print Name CHRIS ROSE

654 519

POLLUTION CONTROL INDUSTRIES

4343 KENNEDY AVENUE
EAST CHICAGO, INDIANA 46312
(219) 397-3951

PICK-UP DATE	TIME	DELIVER DATE	TIME	TYPE TRAILER	HOSE AMT.	PUMP TYPE	MANIFEST NUMBER	CUSTOMER NUMBER
12-12-00				ROLLOFF	N/A	YES NO	12121	
DRIVER	TRUCK NO.	TRAILER NO.	ORDER NO.	MILES ONE WAY	MILES STATE BY STATE			
JOE BANNON	52	PCI003						

SHIPPER	ORIGIN	AUTHORITY TO UNLOAD
DEFENSE LOGISTICS AGENCY MED. PHISTN CONSIGNEE PCI MILLINGTON TN	RECEIVED IN GOOD CONDITION BY: X	<p>MUST BE SIGNED BEFORE UNLOADING</p> <p>TO ENSURE PROPER DELIVERY PLEASE CHECK THAT THE PRODUCT DESCRIBED ON THE BILL OF LADING IS THE TYPE AND AMOUNT YOU EXPECTED THAT THE DRIVER IS BOOKED UP TO THE PROPER TANK WITH ROOM FOR THE AMOUNT OF PRODUCT DESCRIBED ON THE ORDER, AND THAT CONNECTIONS AND PLANT VALVES ARE PROPERLY POSITIONED TO ACCEPT THE LOAD</p> <p>I HAVE CHECKED AND THE PCI DRIVER IS SET UP CORRECTLY AND HE IS AUTHORIZED TO UNLOAD</p> <p>DATE _____ A M P M</p> <p>X _____ CONSIGNEE'S AGENT</p>

LOADING REPORT		EXPLAIN EXCESS OF 1 HR (BE SPECIFIC)	LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (BE SPECIFIC)
PATCH TIME	815 P.M.		DEST. ARRIVED	A.M. P.M.	
ORIGIN ARRIVED	900 P.M.		STARTED	A.M. P.M.	
STARTED	905 P.M.		FINISHED	A.M. P.M.	
FINISHED	915 P.M.		END TERMINAL	A.M. P.M.	
TOTAL TIME	A.M. P.M.	SHIPPER'S SIGNATURE X <i>[Signature]</i>	TOTAL TIME	A.M. P.M.	CONSIGNEE'S SIGNATURE X
DRIVER BANNON	NO.	TERM	DRIVER	NO	TERM
DATE 12/12/00	TRACTOR 52	TRAILER PCI 003	DATE	TRACTOR	TRAILER

ITEM	COMMODITY	RATE	UNIT	TOTAL	GROSS	WEIGHT
					TARE	
					NET	

REMARKS:

654 520

Please print or type.
(Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No T N 4 2 1 0 0 2 0 5 7 0	Manifest Doc No 12122	2. Page 1 of 1
3. Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114				
4. Generator's Phone ()				
5. Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.	6. US EPA ID Number T N D 0 0 0 6 4 6 9 4 3	A. Transporter's Phone (901) 353-5291		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter's Phone		
9. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053	10. US EPA ID Number T N D 0 0 0 7 7 2 1 8 6	C. Facility's Phone (901) 353-5291		
11. Waste Shipping Name and Description		12. Containers No	Type	13. Total Quantity
a. NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL				
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS		E. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information 24 hour emergency phone #: 1-800-851-8061 Land Ban Letter Attached Trailer #: ARP 304 Seal #:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name <i>[Signature]</i>		Signature <i>[Signature]</i>		Month Day Year 12 12 00
17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name <i>[Signature]</i>		Signature <i>[Signature]</i>		Month Day Year 12 12 00
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19				
Printed/Typed Name		Signature		Month Day Year

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location

Defense Logistics Agency / Memphis, TN

EPA ID Number

TN4210020570

Manifest Number

1222

Waste Analysis Available

Yes

No

On file at facility

Date

6/12/00

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group	CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
a	b	c	d	e	f	h
206154	✓			Nonwastewater > 1% TOC & > 1% TSS	Wastewater	List all applicable constituents from Table I and/or key below

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (TI) > = 130 mg

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature

Chris Rose

Print Name

CHRIS ROSE

POLLUTION CONTROL INDUSTRIES

4343 KENNEDY AVENUE
EAST CHICAGO, INDIANA 46312
(219) 397-3951

654 522

PICK-UP DATE	TIME	DELIVER DATE	TIME	TYPE TRAILER	HOSE AMT. TYPE	PUMP	MANIFEST NUMBER	CUSTOMER NUMBER
12-12-00				Roll off	N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	12122	
DRIVER		TRUCK NO.		TRAILER NO.		ORDER NO.		MILES ONE WAY
JOE BANNON		52		PIS-003				MILES STATE BY STATE

SHIPPER	ORIGIN	AUTHORITY TO UNLOAD
Defense Logistics Agency Memphis, TN CONSIGNEE Pollution Control Ind. Millington, TN	RECEIVED IN GOOD CONDITION BY: X _____	MUST BE SIGNED BEFORE UNLOADING TO ENSURE PROPER DELIVERY, PLEASE CHECK THAT THE PRODUCT DESCRIBED ON THE BILL OF LADING IS THE TYPE AND AMOUNT YOU EXPECTED. THAT THE DRIVER IS HOOKED UP TO THE PROPER TANK WITH ROOM FOR THE AMOUNT OF PRODUCT DESCRIBED ON THE ORDER, AND THAT CONNECTIONS AND PLANT VALVES ARE PROPERLY POSITIONED TO ACCEPT THE LOAD. I HAVE CHECKED AND THE PCI DRIVER IS SET UP CORRECTLY AND HE IS AUTHORIZED TO UNLOAD. DATE _____ 19 ____ A.M. X _____ P.M. CONSIGNEE'S AGENT

LOADING REPORT		EXPLAIN EXCESS OF 1 HR (SEE SPECIFIC)	LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (SEE SPECIFIC)
PATCH TIME	A.M. P.M.		DEST. ARRIVED	A.M. P.M.	
ORIGIN ARRIVED	A.M. P.M.		STARTED	A.M. P.M.	
STARTED	A.M. P.M.		FINISHED	A.M. P.M.	
FINISHED	A.M. P.M.		END TERMINAL	A.M. P.M.	
TOTAL TIME	A.M. P.M.	SHIPPER'S SIGNATURE X _____	TOTAL TIME	A.M. P.M.	CONSIGNEE'S SIGNATURE X _____

DRIVER	NO.	TERM	DRIVER	NO.	TERM
Bannon	52				
DATE	TRACTOR	TRAILER	DATE	TRACTOR	TRAILER
12/12/00	52	PIS-003			

ITEM	COMMODITY	RATE	UNIT	TOTAL	WEIGHT
					GROSS
					TARE
					NET

REMARKS _____

654 523

Please print or type
(Form designed for use on elite (12-pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No T N 4 2 1 0 0 2 0 5 7 0	Manifest Doc. No. 1 2 1 - 3	2. Page 1 of 1	
3. Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114					
4. Generator's Phone ()					
5. Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.		6. US EPA ID Number I N D 0 0 0 6 4 6 9 4 3	A. Transporter's Phone (901) 353-5291		
7. Transporter 2 Company Name		8. US EPA ID Number	B. Transporter's Phone		
9. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10. US EPA ID Number T N D 0 0 0 7 7 2 1 8 6	C. Facility's Phone (901) 353-5291		
11. Waste Shipping Name and Description			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL					
b.					
c.					
d.					
D. Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS			E. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information 24 hour emergency phone #: (800) 251 2061 Trailer #: 898 Land Ban Letter Attached Seal #: NA					
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste					
Printed/Typed Name C. J. ROSE		Signature <i>C. J. Rose</i>		Month Day Year 6 6 90	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name JOSEPH P BARNETT		Signature <i>Joe P Barnett</i>		Month Day Year 6 6 90	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in Item 19					
Printed/Typed Name		Signature		Month Day Year	

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location

Defense Logistics Agency / Memphis, TN

EPA ID Number

TN4210020570

Manifest Number

12123

Waste Analysis Available

Yes

No

On file at facility

Date

12/12/00

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
				Nonwastewater > 1% TOC & > 1% TSS	Wastewater	List all applicable constituents from key below	List all applicable constituents from Table I and/or key below
206154	✓	c	d	e	f	g	h

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (Tl) > = 130 mg

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature

Chris Rose

Print Name

CHRIS ROSE

654 525

POLLUTION CONTROL INDUSTRIES

4343 KENNEDY AVENUE
EAST CHICAGO, INDIANA 46312
(219) 397-3951

PICK-UP DATE	TIME	DELIVER DATE	TIME	TYPE TRAILER	HOSE AMT. TYPE	PUMP	MANIFEST NUMBER	CUSTOMER NUMBER
12-12-00				ROLLOFF	NA	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	12123	
DRIVER	TRUCK NO.	TRAILER NO.	ORDER NO.	MILES ONE WAY	MILES STATE BY STATE			
BANNON	52	PCI 003						

SHIPPER	ORIGIN	AUTHORITY TO UNLOAD
DEFENSE LOGISTICS AGENCY MEMPHIS TN CONSIGNEE	RECEIVED IN GOOD CONDITION	<p>MUST BE SIGNED BEFORE UNLOADING</p> <p>TO INSURE PROPER DELIVERY PLEASE CHECK THAT THE PRODUCT DESCRIBED ON THE BILL OF LADING IS THE TYPE AND AMOUNT YOU EXPECTED THAT THE DRIVER IS HOOKED UP TO THE PROPER TANK WITH ROOM FOR THE AMOUNT OF PRODUCT DESCRIBED ON THE ORDER AND THAT CONNECTIONS AND PLANT VALVES ARE PROPERLY POSITIONED TO ACCEPT THE LOAD</p> <p>I HAVE CHECKED AND THE PCI DRIVER IS SET UP CORRECTLY AND HE IS AUTHORIZED TO UNLOAD</p> <p>DATE _____ A M P M</p> <p>X _____ CONSIGNEE'S AGENT</p>
PCI MILLINGTON TN	BY X _____	

LOADING REPORT		EXPLAIN EXCESS OF 1 HR (BE SPECIFIC)	LOADING REPORT		EXPLAIN EXCESS OF 1 HOUR (BE SPECIFIC)
DISPATCH TIME	A.M. P.M. NOON		DEST. ARRIVED	A.M. P.M.	
ORIGIN ARRIVED	A.M. P.M. 12:30		STARTED	A.M. P.M.	
STARTED	A.M. P.M. 12:35		FINISHED	A.M. P.M.	
FINISHED	A.M. P.M. 12:45		END TERMINAL	A.M. P.M.	
TOTAL TIME	A.M. P.M.	SHIPPER'S SIGNATURE X _____	TOTAL TIME	A.M. P.M.	CONSIGNEE'S SIGNATURE X _____
DRIVER	NO	TERM	DRIVER	NO	TERM
DATE 12-12-00	TRACTOR 52	TRAILER PCI 003	DATE	TRACTOR	TRAILER

ITEM	COMMODITY	RATE	UNIT	TOTAL	GROSS	WEIGHT
					TARE	
					NET	

REMARKS.

654 526

NON-HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN-42100-20570	Manifest Doc No 1-2-140	2 Page 1 of 1	
3. Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114					
4 Generator's Phone ()					
5 Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.		6 US EPA ID Number IND0000646943	A Transporter's Phone (901) 353-5291		
7. Transporter 2 Company Name		8 US EPA ID Number	B Transporter's Phone		
9 Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10. US EPA ID Number IND0000772186	C Facility's Phone (901) 353-5291		
11. Waste Shipping Name and Description			12 Containers No. Type	13 Total Quantity	14. Unit Wt/Vol
a NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL			001 RM 20000 P		
b.					
c.					
d.					
D Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS			E Handling Codes for Wastes Listed Above		
15 Special Handling Instructions and Additional Information 24 hour emergency phone #: 1-800-51-1261 Trailer #: 463 Land Ban Letter Attached Seal #:					
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.					
Printed/Typed Name			Signature		Month Day Year
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature		Month Day Year
Printed/Typed Name			Signature		Month Day Year
18 Transporter 2 Acknowledgement of Receipt of Materials			Signature		Month Day Year
Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space					
20 Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in Item 19					
Printed/Typed Name			Signature		Month Day Year

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location

Defense Logistics Agency / Memphis, TN

EPA ID Number

TW4210020570 Manifest Number 12140

Waste Analysis Available

Yes

No

On file at facility

Date

12/14/00

654 527

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
				Nonwastewater > 1% TOC & > 1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table I and/or key below h
206154	✓	c	d				

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (Tl) > = 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Chris Rose

Print Name CHRIS ROSE

654 528

Please print or type
(Form designed for use on elite (12 pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No T N 4 2 1 0 0 2 0 5 7 0	Manifest Doc. No 1-71	2. Page 1 of 1
3 Generator's Name and Mailing Address DEFENSE LOGISTIC AGENCY 2163 AIRWAYS BOULEVARD, MEMPHIS, TN 38114				
4. Generator's Phone ()				
5. Transporter 1 Company Name POLLUTION CONTROL INDUSTRIES INC.		6 US EPA ID Number I N D 0 0 0 6 4 6 9 4 3	A. Transporter's Phone (901) 353-5291	
7 Transporter 2 Company Name		8 US EPA ID Number	B. Transporter's Phone	
9 Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 5485 TAY-FOR DRIVE MILLINGTON, TN 38053		10. US EPA ID Number I N D 0 0 0 7 7 2 1 8 6	C. Facility's Phone (901) 353-5291	
11 Waste Shipping Name and Description			12 Containers No Type	13 Total Quantity
a. NON HAZARDOUS, NON R.C.R.A. REGULATED MATERIAL				
b.				
c.				
d.				
D Additional Descriptions for Materials Listed Above 11A WS-206154N NON HAZ SOIL AND DEBRIS			E Handling Codes for Wastes Listed Above	
15 Special Handling Instructions and Additional Information 24 hour emergency phone #: 1-515-515-1000 Land Ban Letter Attached Trailer #: 1-515-515-1000 Seal #:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name		Signature		Month Day Year
				1 1 1 1 1 1
17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
<i>Joseph P. P...</i>		<i>Joseph P. P...</i>		1 1 1 1 1 1
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
19 Discrepancy Indication Space				
20 Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name		Signature		Month Day Year

GENERATOR

TRANSPORTER

FACILITY

Y

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location Defense Logistics Agency / Memphis, TNEPA ID Number TAU4210020570 Manifest Number 12141Waste Analysis Available Yes ☒ On file at facility No ☐ Date 12/14/00

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
				Nonwastewater > 1% TOC & > 1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table I and/or key below h
206154	<input checked="" type="checkbox"/>	c	d				

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (TI) > = 130 mg

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Chris RosePrint Name CHRIS ROSE

HAZARDOUS WASTE SOLIDS (SITE 24-A)

DRAFT



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210029570		Manifest Document No. 02792		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number CWMA 910781					
4. Generator's Phone 901-544-0612						B. State Generator's ID					
5. Transporter 1 Company Name ACTION RESOURCES INC						C. State Transporter's ID					
6. US EPA ID Number ALR01010007237						D. Transporter's Phone 800-288-3845					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459						G. State Facility's ID					
10. US EPA ID Number ALD000622464						H. Facility's Phone 205/652-9721					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. RQ, Hazardous Waste Solid, n.o.s. (Arsenic), 9, NA3077, PG III, ERG171 043003924						No. 0101		Type DT		Waste No. D004	
Disposal Approval # 043003924 CWM Profile # CT1637						0101		010135			
b. Disposal Approval # _____ CWM Profile # _____											
c. Disposal Approval # _____ CWM Profile # _____											
d. Disposal Approval # _____ CWM Profile # _____											
15. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above					
11a: _____						_____					
State of Generation											
15. Special Handling Instructions and Additional Information											
Purchase Order # _____											
24 Hour Emergency Contact: Mike Lee 901-745-4999 or DLA 800-851-8061, or Frank Johnson 703-825-3792, Need CD											
Work Order # _____ EMERGENCY CONTACT: GG0401041											
16. GENERATOR'S CERTIFICATION I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport 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 Mike Lee						Signature <i>Mike Lee</i>			Month Day Year 04/25/01		
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Willie Fortner			Signature <i>Willie Fortner</i>		
									Month Day Year 04/25/01		
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name			Signature		
									Month Day Year		
19. Discrepancy Indication Space											
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19											
Printed/Typed Name						Signature			Month Day Year		



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570	Manifest Document # 02784	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA		2163 Airways Blvd. Memphis, TN, 38114		A. State Manifest Document Number CWMA 910783	
4. Generator's Phone 901-544-0612		B. State Generator's ID		C. State Transporter's ID	
5. Transporter 1 Company Name ACTIONAL RESOURCES INC		8. US EPA ID Number ALRD 000072317		D. Transporter's Phone 800-228-8845	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number		F. Transporter's Phone	
		A L D 0 0 0 6 2 2 4 6 4		G. State Facility's ID 205/652-9721	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. RQ, Hazardous Waste Solid, n.o.s. (Arsenic), 9, NA3077, Disposal Approval # RG III, ERG171 4042039254 Profile # CT1637		No	Type		
b. Disposal Approval # _____ CWM Profile # _____		0101	DT	010135	Y
c. Disposal Approval # _____ CWM Profile # _____					
d. Disposal Approval # _____ CWM Profile # _____					
Additional Descriptions for Materials Listed Above		K. Heading Codes for Wastes Listed Above			
11a		11b			
State of Generation		State of Destination			
15. Special Handling Instructions and Additional Information					
Purchase Order # 901-544-0612 24 Hour Emergency Contact: Mike Lee 801-745-4988 or DLA 800-851-8081, or Frank Johnson 703-825-3792, Need CD Work Order # GG0401041 EMERGENCY CONTACT.					
16. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport 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 Mike Lee		Signature <i>Mike Lee</i>		Month Day Year 04/25/01	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Danny Blackman		Signature <i>Danny Blackman</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
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	



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's ID No 910210020570		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA Memphis, TN, 38114				A. State Manifest Document Number CWMA 910784							
4. Generator's Phone 901-544-0812				B. State Generator's ID							
5. Transporter 1 Company Name Action Resources Inc				C. State Transporter's ID							
6. US EPA ID Number ALR000000227				D. Transporter's Phone 1-800-22-P895							
7. Transporter 2 Company Name				E. State Transporter's ID							
8. US EPA ID Number				F. Transporter's Phone							
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459				G. State Facility's ID							
10. US EPA ID Number ALD0000622464				H. Facility's Phone 205/652-9721							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No Type		13. Total Quantity		14. Unit Wt/Vol		Waste ID	
a. RQ, Hazardous Waste Solid, n.o.s. (Arsenic), 9, NA3077, PG III, ERG171				0101		DT		Y		D004	
Disposal Approval # 043003-9241 CWM Profile # CT1637											
b.											
Disposal Approval # CWM Profile #											
c.											
Disposal Approval # CWM Profile #											
d.											
Disposal Approval # CWM Profile #											
J. Additional Descriptions for Materials Listed Above 118 043003-9241-M				K. Handling Codes for Wastes Listed Above M111							
15. Special Handling Instructions and Additional Information 544-0612 24 Hour Emergency Contact: Mike Lee 901-745-4888 or DLA 800-851-8081, or Frank Johnson 703-825-3782, Need CD Work Order # EMERGENCY CONTACT. GG0401041											
16. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport 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 Mike Lee				Signature Mike Lee				Month Day Year 04/25/01			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Lamar Dudley				Signature Lamar Dudley				Month Day Year 04/25/01			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature				Month Day Year			
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19 Printed/Typed Name Signature Month Day Year											

654 534

03/26/2001 MON 15:17 FAX 901 360 0485

WASTE MANAGEMENT

002



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File? ☒ YES ☐ NOProfile Number WM **CT1637**☐ Hazardous ☐ Non-Hazardous ☐ TSCA

Renewal Date / /

A. Waste Generator Information

1. Generator Name: Memphis Depot DLA 2. SIC Code: Micheal E. Lee
 3. Facility Street Address: 2163 Airways Blvd 4. Phone: (901) 544-0612
 5. Facility City: Memphis 6. State/Province: TN
 7. Zip/Postal Code: 38114 8. Generator USEPA/Federal ID #: TN4210020570
 9. SCounty: Shelby 10. State/Province ID #:
 11. Customer Name: Innovative Waste Mgmt. Inc 12. Customer Phone: (343) 725-2000
 13. Customer Contact: Gerry Girardeau 14. Customer Fax: (843) 725-2018
 15. Billing Address: PO Box-50397 Summerville, SC 29485 ☐ Same as above

B. Waste Stream Information

1. Description

a. Name of Waste: Arsenic Soil - Hazardous
 b. Process Generating Waste: Clean up of soil at a military site that destroyed chemical warfare material in the 1940's

c. Color	d. Strong odor (describe)	e. Physical state @ 70°F	f. Layers	g. Free liquid range to %
<u>Brown-Black</u>	<u>Mild</u>	<input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Sludge <input type="checkbox"/> Other	<input type="checkbox"/> Single Layer <input type="checkbox"/> Multi-layer	
				h. pH. Range 6 to 8 %

i. Liquid Flash Point: ☐ <73°F ☐ 73-99°F ☐ 100-139°F ☐ 140-199°F ☐ ≥ 200°F ☒ Not applicable

j. Chemical Composition (Use all constituents including halogenated organics, debris, and UHC's present in any concentration and submit representative analysis):

Constituents	Concentration Range	Constituents	Concentration Range
<u>soil/Dirt</u>	<u>99-100%</u>		
<u>Inert Solids</u>	<u>0-1%</u>		

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

k. ☐ Oxidizer ☐ Pyrophoric ☐ Explosive ☐ Radioactive
☐ Carcinogen ☐ Infectious ☐ Shock Sensitive ☐ Water Reactive

l. Does the waste represented by this profile contain any of the carcinogens which require OSHA notification? (list in Section B.1.)

☐ YES ☒ NO

m. Does the waste represented by this profile contain dioxins? (list in Section B.1.)

☐ YES ☒ NO

n. Does the waste represented by this profile contain asbestos?

☐ YES ☒ NO

If yes

☐ friable ☒ non-friable

o. Does the waste represented by this profile contain benzene?

☐ YES ☒ NO

If yes, concentration _____ ppm

Is the waste subject to the benzene waste operations NESHAP?

☐ YES ☒ NO

p. Is the waste subject to RCRA Subpart CC controls?

☐ YES ☒ NO

If no, does the waste meet the organic LDR Exemption?

☒ YES ☐ NO

If no, does the waste contain <500 ppmw volatile organic (VO)?

☒ YES ☐ NO

Volatile organic concentration _____ ppmw

q. Does the waste contain any Class I or Class II ozone-depleting substances?

☐ YES ☒ NO

r. Does the waste contain debris? (list in Section B.1.)

☐ YES ☒ NO

2. Quantity of Waste

Estimated Annual Volume 60 ☐ Tons ☒ Yards ☐ Drums ☐ Other (specify) _____

3. Shipping Information

a. Packaging:

☒ Bulk Solid, Type/Size: Rolloff (25yd³)☐ Bulk Liquid, Type, Size: _____☐ Drum, Type, Size: _____☐ Other: _____b. Shipping Frequency: Units 60Yds Per: ☐ Month ☐ Quarter ☐ Year ☒ One time ☐ Otherc. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip d, e, and f) ☒ YES ☐ NO

03/20/2001-MON 15:18 FAX 901 360 0485

WASTE MANAGEMENT

005



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

- d. Reportable Quantity (lbs.; kgs.): 11 lb. e. Hazard Class/ID #: NA3077
 f. USDOT Shipping Name: R.O., Hazardous Waste solids N.O. 3. (Arsenic)
 g. Personal Protective Equipment Requirements: OSHA Requirements for Arsenic pkg III
 h. Transporter/Transfer Station: Action Resource, Inc.

C. Generator's Certification. (Please check appropriate responses, sign, and date below.)

- Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2. ☒ YES ☐ NO
 a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U) DOT
 b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (if yes, list in Section B.1.) ☐ YES ☒ NO
 c. Does this waste contain debris? (if yes, list size and type in Chemical Composition - B.1.) ☐ YES ☒ NO
- Is this a state hazardous waste? ☐ YES ☒ NO
 Identify ALL state hazardous waste codes _____
- Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up? ☒ YES ☐ NO
 If yes, attach Record of Decision (ROD), 104/106 or 122 order or court order that governs site clean-up activity. For state mandated clean-up, provide relevant documentation.
- Does the waste represented by this waste profile sheet contain radioactive material, or is disposal regulated by the Nuclear Regulatory Commission? ☐ YES ☒ NO
- Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (if yes, list in Chemical Composition - B.1.) ☐ YES ☒ NO
 a. If yes, were the PCBs imported into the U.S.? ☐ YES ☐ NO
- Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste material, and has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? ☒ YES ☐ NO
- Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? ☒ YES ☐ NO

☐ Check here if a Certificate of Destruction or Disposal is required.

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. I authorize WM to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Certification Signature: _____

Title: EPS/SWName (Type or Print): Michael LeeCompany Name: DDSPF (DLA)Date: 4/16/2001
☐ Check if additional information is attached. Indicate the number of attached pages _____

D. WM Management's Decision		FOR WM USE ONLY	
1. Management Method	<input type="checkbox"/> Landfill <input type="checkbox"/> Non-hazardous Solidification <input type="checkbox"/> Bioremediation <input type="checkbox"/> Incineration <input type="checkbox"/> Hazardous Stabilization <input type="checkbox"/> Other (Specify) _____		
2. Proposed Ultimate Management Facility:	_____		
3. Precautions, Special Handling Procedures, or Limitation on Approval:	_____		
4. Waste Form _____	5. Source _____	6. System Type _____	
Special Waste Decision _____		<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
Salesperson's Signature: _____		Date: _____	
Division Approval Signature (Optional): _____		Date: _____	
Special Waste Approvals Person Signature: _____		Date: _____	



LDR NOTIFICATION FORM

Generator Name Memphis Depot Caretaker DLAManifest No. 02764

Pursuant to 40 CFR §268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268 Land Disposal Restrictions (LDR)

A. GENERAL WASTE NOTIFICATION

Form Line No.	SK Profile No.	EPA Waste Codes & LDR Subcategories (if any) List codes or use Attachment 1	WWW	WW	Waste Constituent Notification Check the "None" box or List Legend Constituent # or use Attachment 2
1	104152	D003-EX <input type="checkbox"/> Check if Attachment 1 has been used	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> None <input type="checkbox"/> Check if Attachment 2 has been used
2		<input type="checkbox"/> Check if Attachment 1 has been used	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> None <input type="checkbox"/> Check if Attachment 2 has been used
3		<input type="checkbox"/> Check if Attachment 1 has been used	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> None <input type="checkbox"/> Check if Attachment 2 has been used
4		<input type="checkbox"/> Check if Attachment 1 has been used	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> None <input type="checkbox"/> Check if Attachment 2 has been used
5		<input type="checkbox"/> Check if Attachment 1 has been used	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> None <input type="checkbox"/> Check if Attachment 2 has been used
6		<input type="checkbox"/> Check if Attachment 1 has been used	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> None <input type="checkbox"/> Check if Attachment 2 has been used

B. HAZARDOUS DEBRIS NOTIFICATION

- ☐ This hazardous debris as identified above on Line No(s) _____ is subject to the alternative treatment standards of 40 CFR §268.45. The waste contains the following contaminants subject to treatment (check all that apply):
- ☐ Toxicity characteristic debris ☐ Debris contaminated with listed waste ☐ Cyanide reactive debris

C. CONTAMINATED SOIL NOTIFICATION & CERTIFICATION

- ☐ This contaminated soil as identified above on Line No(s) _____ is subject to the alternative treatment standards of 40 CFR §268.49(c). Complete the following: I certify under penalty of law that I personally have examined this contaminated soil & it ☐ does ☐ does not contain listed hazardous waste & ☐ does ☐ does not exhibit a characteristic of hazardous waste & ☐ is subject to ☐ complies with ☐ soil treatment standards as provided by §268.49(c) or the universal treatment standards. Note: Constituents subject to treatment are any constituents listed in 40 CFR §268.48 Universal Treatment Standards that are reasonably expected to be present in any given volume of contaminated soil except fluoride, selenium, sulfides, vanadium & zinc & are present at concentrations greater than ten times the universal treatment standard.

D. LAB PACK (INCINERATION) NOTIFICATION & CERTIFICATION

- ☐ This lab pack, as identified above on Line No(s) _____ is subject to the alternative treatment standards of 40 CFR §268.42(c). I certify under penalty of law that I personally have examined & am familiar with the waste & that the lab pack contains only wastes that have not been excluded under Appendix IV to 40 CFR Part 268 & that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR §268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

E. EXTENSIONS & VARIANCES

- ☐ This waste as identified above on Line No(s) _____ is not prohibited from land disposal & is subject to a deadline extension or variance, e.g. treatability variance, case-by-case extension. Describe below any extension or variance that applies to this waste & include applicable dates.

Generator's Authorized Signature

Name & Title (Printed or Typed)

Date

ORIGINAL



CHEMICAL WASTE MANAGEMENT, INC. LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (UTS)

Generator Name: Memphis Diesel Corporation, Inc.

CWM Profile Number: 277637

State Manifest No.: CWM A910782

This form is submitted to Chemical Waste Management, Inc. in accordance with 40 CFR Part 268 and LAC33.V Chapter 22, which restrict the land disposal of certain hazardous wastes.

1. IDENTIFICATION OF THE WASTE

- Is this waste a nonwastewater or a wastewater? (See 40 CFR 268.2 and LAC33.V.2203) Check One: ☒ Non-Wastewater ☐ Wastewater
- If this waste is subject to any California List restrictions, enter the letter from below (A, B, 1 or B.2) next to each restriction that is applicable.
- HOCs _____ PCBs _____ Acids _____ Metals _____ Cyanides _____
- Identify All USEPA hazardous waste codes that apply to this waste shipment as defined by 40 CFR 261 and LAC33.V Chapter 49. For each waste code identify the corresponding subcategories, or check NONE if the waste code has no subcategory. Spent solvent and California List treatment standards are listed on the back of this form.
- If F039, multi-source leachate applies, those constituents must be listed and attached by the generator. If D001, D002, D003 (Explosive, water-reactive, or other reactive categories), or D012-D043 require treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

R E F	4. US EPA HAZARDOUS WASTE CODE(S)	5. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		6. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW
		DESCRIPTION	NONE	
1	D004	Arsenic		A
2				
3				
4				
5				
6				
7				
8				
9				
10				

To identify F039 or D001, D002, D003 (Explosive, water-reactive, or other reactive categories), D012-D043, underlying hazardous constituent(s), use "F039/Underlying Hazardous Constituent Form" provided (CWM-2004A) and check here: ☐

To list additional USEPA waste code(s) and subcategory(s), use the supplemental sheet provided (CWM-LC-2005-B) and check here: ☐

II. HOW MUST THE WASTE BE MANAGED?

In column 6 above, enter the letter (A, B, 1, B.2, B.3, C, D or E) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7 and LAC 33.V Chapter 22, Subchapter D). Please understand that if you enter the letter B.1, B.2, B.3, B.4, D or E you are making the appropriate certification as provided below.

A. RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32 or RCRA Section 3004(d) and LAC 33.V.2213 and LAC33.V Chapter 22, Subchapter B.

☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

B.1. RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D, LAC 33.V Chapter 22, Subchapter B, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004 (d) and LAC 33.V.2213 without (impermissible) dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

B.2. RESTRICTED WASTE FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42 and LAC 33.V.2227 of the Louisiana Hazardous Waste Regulations. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.3. GOOD FAITH ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR 264 Subpart O or 265 Subpart O and LAC 33.V Chapter 31 or LAC33.V Chapter 43, Subchapter N, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.4. WASTEWATER CERTIFICATION

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 and LAC 33.V, Chapter 22, Subchapter B to remove the hazardous characteristics. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 6 above.

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d) and LAC 33.V.2213, and therefore can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support and can support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and LAC33.V Chapter 2 Subchapter B and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) and LAC33.V Chapter 22 Subchapter A and LAC 33.V.2213. I believe that the information submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment."

E. WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS

This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Signature: Michael Lee

Title: EPS/SM

Date: 04/25/01

CWM-2004A-1.0

The waste identified on the first page of this form is described by any of the following USEPA hazardous waste codes: D01, P002, P003, P004, P005, and all solvent constituents will not be monitored by the treater, and/or this hazardous waste is subject to any prohibitions identified as California List restrictions (40 CFR 268.32 and/or RCRA Section 3004(d)). For each constituent MUST be identified below by checking the appropriate box, and this page must accompany the shipment, along with the previous page of this form. If the waste code P039 describes this waste, then the corresponding list of constituents must be attached. If D001, D002, D003 or D012-D043 require treatment to 268.42 standards, then the underlying hazardous constituent(s) must also be attached.

SOLVENT WASTE TREATMENT STANDARDS

P001 through P005 spent solvent constituents and their associated USEPA hazardous waste code(s).	Treatment Standard		P001 through P003 spent solvent constituents and their associated USEPA hazardous waste code(s).	Treatment Standard	
	Wastewater	Nonwastewater		Wastewater	Nonwastewater

If spent solvent treatment standards are measured through a total waste analysis (TCA), unless otherwise noted, wastewater limits are mg/l, nonwastewater are mg/kg.

CALIFORNIA LIST TREATMENT STANDARDS--40CFR 268.32, 40 CFR 268.42 and RCRA Section 3004(d)

A waste must first be designated as a US EPA Hazardous waste before the waste can be subject to the California List restrictions.

Restricted waste description	Prohibition	Treatment Standard
Liquid* or nonliquid wastes containing Halogenated Organic Compounds listed in 40 CFR 268, Appendix III	Liquid* wastes: Greater than or equal to 1,000 mg/l Nonliquid wastes: Greater than or equal to 1,000 mg/kg	40 CFR 268.42(a)(2) - INCIN or PSUBS
Liquid* wastes containing Poly Chlorinated Biphenyls (PCBs)	Greater than or equal to 80 ppm	40CFR 268.42(a)(1) - INCIN or PSUBS Also see 40 CFR 761.60 and .70
Liquid* wastes containing Metals Note: Hazardous wastes containing As, Cd, Cr, Hg, Pb, or Se must be evaluated if not characteristically hazardous for that metal	One or more of the following metals (or elements) at concentrations greater than or equal to the following: Nickel and/or compounds as Ni: 134mg/l Thallium and/or compounds as Tl: 110mg/l	RCRA Section 3004(d)

* - For the definition "liquid" refer to Method 9095, the Paint Filter Liquids Test from EPA manual SW-846

SUBCATEGORY REFERENCES

001:

- .. Ignitable characteristic wastes, except for the 40 CFR 261.21(a)(1) High TOC subcategory, that are managed in non-CWA/non-CWA equivalent/non-Class I SMDA system.
- .. Ignitable characteristic wastes, except for the 40 CFR 261.21(a)(1) High TOC subcategory, that are managed in CWA/CWA-equivalent or Class I SMDA systems.
- .. High TOC Ignitable characteristic liquids subcategory based on 40 CFR 261.21(a)(1) - greater than or equal to 10% total organic carbon.

002:

- .. Corrosive characteristic wastes that are managed in non-CWA/non-CWA-equivalent/non-Class I SMDA systems.
- .. Corrosive characteristic wastes that are managed in CWA, CWA-equivalent, or Class I SMDA systems.

HAZARDOUS WASTE SOLIDS (SITE 1)

DRAFT

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN0210029570	Manifest Document No. 01700	2. Page 1 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2103 Airways Blvd, Memphis, TN, 38114					
4. Generator's Phone (901-) 544-0612					
5. Transporter 1 Company Name Pollution Control Industries	6. US EPA ID Number IND000646943				
7. Transporter 2 Company Name	8. USEPA ID Number				
9. Designated Facility Name and Site Address Pollution Control Ind-TN 5435 Tay-Far-Dale, Millington, TN, 38053		10. USEPA ID Number TND000772100			

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity	14. U.S. DOT Hazard
No.	Type	No.	Type		
a. <input checked="" type="checkbox"/>	RG, Hazardous Waste Solids, n.e.s., (Lead/Arsenic) 9, UN3077, PG III, ERG171	001	TP	00020	Y
b.					
c.					
d.					

15. Special Handling Instructions and Additional Information

24 Hour Emergency Contact: ., Need CD

DLA 800-851-8061 or Mike Lee 901-544-0612 or Frank Johnson 703-625-3792

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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 Michael E. Lee	Signature <i>Michael E. Lee</i>	Month Day Year 11/02/00
---	------------------------------------	-----------------------------------

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name Charles McVay	Signature <i>Charles McVay</i>	Month Day Year 11/02/00
--	-----------------------------------	-----------------------------------

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Month Day Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570	Manifest Document No. 01707	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Container DLA 2103 Airways Blvd, Memphis, TN, 38114					
4. Generator's Phone (901) 544-0612					
5. Transporter 1 Company Name <i>Pollution Control Industries</i>		6. US EPA ID Number <i>TND000646943</i>			
7. Transporter 2 Company Name		8. US EPA ID Number			
9. Designated Facility Name and Site Address Pollution Control Ind-TN 5405 Top-Far-Drive, Millington, TN, 38053		10. US EPA ID Number TND000772100			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	<input checked="" type="checkbox"/> PO. Hazardous Waste Solids, n.e.s. (Lead/Arsenic) 9, UN3077, PG III, ERO171	001	TP	00020	P
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: . . . Need CD DLA 800-851-8061 or Mike Lee 901-544-0612 or Frank Johnson 703-625-3792					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 <i>Michael E. Lee</i>		Signature <i>Michael E. Lee</i>		Month Day Year <i>1/12/70</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name <i>Charles McVay</i>		Signature <i>Charles McVay</i>		Month Day Year <i>1/12/70</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Caretaker DLA 2163 Airways Blvd, Memphis, TNEPA ID Number TN4210020570 Manifest Number 01707Waste Analysis Available: ☒ Yes ☐ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003*, D004-D043
				Non-wastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table I h
203864	b	c D004, D008	D	NWW			231, 239

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005. (for Column g)

- 5) Acetone
6) Benzene
7) N-Butyl Alcohol
8) Carbon Disulfide
9) Carbon Tetrachloride
10) Chlorobenzene
11) Cresols (o, m, or p isomers)
12) Cresylic Acid
13) Cyclohexanone
14) 1,2-Dichlorobenzene
15) Ethyl Acetate
16) Ethyl Benzene
17) Ethyl Ether
18) Isobutanol (isobutyl alcohol)
19) Methanol
20) Methylene Chloride
21) Methyl Ethyl Ketone
22) Methyl Isobutyl Ketone
23) Nitrobenzene
24) Pyridine
25) Tetrachloroethylene
26) Toluene
27) 1,1,1 Trichloroethane
28) 1,1,2 Trichloroethane
29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
30) Trichloroethylene
31) Trichlorofluoromethane
32) Xylene (Total)

654

543

I certify under penalty of law that the above information is accurate and true.

Signature Michael E. LeePrint Name Michael E. LeeDate 10/27/2000

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TMD210020570	Manifest Document No. 01708	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2103 Airways Blvd, Memphis, TN, 38114					
4. Generator's Phone (901) 544-0612					
5. Transporter 1 Company Name Pollution Control Industries		6. US EPA ID Number TMD0000646943			
7. Transporter 2 Company Name		8. US EPA ID Number			
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5405 Taylorsville, Millington, TN, 38053		10. US EPA ID Number TMD000772100			
GENERATOR	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers	13. Total Quantity	14. Unit
			No	Type	Wt/Vol
	a. <input checked="" type="checkbox"/> PO, Hazardous Waste Solids, n.e.s., (Land/Residue) 9, 150077, PG II, EPC171		001	TP	00020
	b.				
	c.				
d.					
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: , , Head CD DLA 800-851-8061 Mike lee 901-544-0612 or Frank Johnson 703-625-3792					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael E. Lee		Signature Michael E. Lee		Month Day Year 11/01/97	
TRANSPORTER	17. Transporter 1 Acknowledgement of Receipt of Materials				
	Printed/Typed Name Charles McVay		Signature Charles McVay		Month Day Year 11/02/97
FACILITY	18. Transporter 2 Acknowledgement of Receipt of Materials				
	Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Month Day Year	

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Memphis Depot Caretaker DLA 2163 Airways Blvd, Memphis, TN

Generator Name/Location

EPA ID Number
TN4210020570

Manifest Number

01708

Waste Analysis Available: ☒ Yes ☐ No ☐ On file at facility

[illegible]

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column 9)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

Under penalty of law that the above information is accurate and true.

Signature

Print Name _____

106. Michael B. Lee

Date _____

2/27/2000

DEGRADATION BY-PRODUCTS (SITE 24-A)

DRAFT

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No. 01706		2. Page 1 Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd, Memphis, TN, 38114						This area is reserved for use by the generator, transporter, or facility owner. It may be used for additional information, but it is not required by Federal law.	
4. Generator's Phone (901-) 544-0612							
5. Transporter 1 Company Name Pollution Control Industries		6. US EPA ID Number IND000646943					
7. Transporter 2 Company Name		8. US EPA ID Number					
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5455 Tay-Far-Drive, Millington, TN, 38053		10. US EPA ID Number TND000772196					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt/Vol	
a. <input checked="" type="checkbox"/> RQ, Hazardous Waste Solids, n.e.s., (Lead/Arsenic) 9, NA3077, PG III, ERG171				001 TP		00020 Y	
b.							
c.							
d.							
15. Special Handling Instructions and Additional Information							
24 Hour Emergency Contact: , , Need CD DLA 800-851-8061 or Mike Lee 901-544-0612 or Frank Johnson 703-625-3792							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael E. Lee				Signature <i>Michael E. Lee</i>		Month Day Year 11/02/00	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name Charles McVay		Signature <i>Charles McVay</i>	
						Month Day Year 11/02/00	
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name		Signature	
						Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		Month Day Year	

654 549



PROHIBITION CONTROL INDUSTRIES
4343 Kennedy Ave., East Chicago, IN 46312
Telephone: (219) 397-3951 FAX: (219) 397-6411
(800) 388-7242

MATERIAL DATA SURVEY

PCI

Memphis Depot Caretaker Division-

Generator Name: Defense Logistic Agency Billing Name: Innovative Waste Mgmt. Inc.
Street: 2163 Airways Blvd. Bldg. 144 Street P. O. Box 50397
City: Memphis State: TN Zip: 38114-5210 City: Summerville State: SC Zip: 29485
Technical Contact: Mike Lee Title: Enviro. Mgr. Phone: 901-544-0611 Fax: 901-745-4280
Federal EPA ID No.: TN4210020570 State ID No.: _____ S.I.C. Code: 9711 Form Code R: _____
PCI Sales Rep. TH

☐ Check if you are a Conditionally Exempt Small Quantity Generator

Common Name of Waste: Toxic characteristic soil

Original Process Generating Waste (must be specific): Clean up of soil contaminated with toxic metals and hazardous materials.

Method of Shipment: ☐ Drum (s) ☒ Bulk 140 ton Quantity _____ per ☐ Wk ☐ Mo ☐ Qtr ☒ Yr ☐ One-time

MSDS Attached? ☐ Yes ☒ No

TCLP Attached? ☒ Yes ☐ No

☐ Check if sample has been submitted

PHYSICAL PROPERTIES @ 25°C (77°F)

Color: Brown/Black % Total Halogens: 0 Specific Gravity: 13.86 lbs
per gal.

Physical State: ☐ None ☐ Solid ☐ Sludge ☐ Slurry
Phase/Layers: _____

% Liquid: 100 % Solid: _____
% Sludge: _____ % Powder: _____
% Other, describe: _____

CHEMICAL COMPOSITION

(List hazardous inerts in non-hazardous components and concentrations in %)

Soil/dirt _____ %
Glass _____ %
Sodium Hydroxide _____ %

OTHER COMPONENTS TOTAL (PPM)

NAME	NO	YES	NAME	NO	YES
CHLORIDES	<input type="checkbox"/>	<input type="checkbox"/>	ARSENIC	<input type="checkbox"/>	<input type="checkbox"/>
SULFIDES	<input type="checkbox"/>	<input type="checkbox"/>	LEAD	<input type="checkbox"/>	<input type="checkbox"/>
OXIDES	<input type="checkbox"/>	<input type="checkbox"/>	PCBS	<input type="checkbox"/>	<input type="checkbox"/>
HAZARDOUS PROPERTIES	<input type="checkbox"/>	<input type="checkbox"/>	PHENOLS	<input type="checkbox"/>	<input type="checkbox"/>
U NONE	<input type="checkbox"/>	<input type="checkbox"/>	HAZARDOUS PROPERTIES	<input type="checkbox"/>	<input type="checkbox"/>
U WATER REACTIVE	<input type="checkbox"/>	<input type="checkbox"/>	U AIR REACTIVE	<input type="checkbox"/>	<input type="checkbox"/>
U SHOCK SENSITIVE	<input type="checkbox"/>	<input type="checkbox"/>	U POLYMERIZABLE	<input type="checkbox"/>	<input type="checkbox"/>
U RADIOACTIVE	<input type="checkbox"/>	<input type="checkbox"/>	U PATHOGEN	<input type="checkbox"/>	<input type="checkbox"/>
U CORROSIVE	<input type="checkbox"/>	<input type="checkbox"/>	U BIOLOGICAL	<input type="checkbox"/>	<input type="checkbox"/>
U DANGEROUS	<input type="checkbox"/>	<input type="checkbox"/>	OTHER	<input type="checkbox"/>	<input type="checkbox"/>

D. Based on knowledge or analysis, provide an approximate value for TCLP concentrations or total metal concentrations in ppm.

ORGANIC CHARACTERISTICS

NAME	CONC.	UNIT
D001 Arsenic	5.0	0-60
D002 Barium	100.0	BRI
D003 Cadmium	1.0	"
D004 Chromium	5.0	"
D005 Lead	5.0	5-80
D006 Mercury	0.2	BRI
D007 Selenium	1.0	"
D008 Silver	5.0	"
D009 Copper	100.0	"
D010 Zinc	500.0	"

ORGANIC CHARACTERISTICS

NAME	CONC.	UNIT
D012 Endrin	0.02	BRI
D013 Lindane	0.4	"
D014 Methoxychlor	10.0	"
D015 Toxaphene	0.5	"
D016 2,4-Dichlorophenoxyacetic Acid	10.0	"
D017 2,4,5-TP (Silvex)	1.0	"
D018 Benzene	0.5	"
D019 Carbon Tetrachloride	0.5	"
D020 Chloroform	0.03	"
D021 Chlorobenzene	100.0	"
D022 Chloroform	6.0	"
D023 o-Cresol	200.0	"
D024 m-Cresol	200.0	"
D025 p-Cresol	200.0	"
D026 Cresol	200.0	"
D027 1,4-Dichlorobenzene	7.5	"
D028 1,2-Dichloroethane	0.5	"
D029 1,1-Dichloroethylene	0.7	"
D030 2,4-Dinitrophenol	0.13	"
D031 Heptachlor (and it's epoxide)	0.008	"
D032 Heptachlorobenzene	0.13	"
D033 Hexachlorocyclopentadiene	0.5	"
D034 Hexachlorocyclopentadiene	3.0	"
D035 Methyl Ethyl Ketone	200.0	"
D036 Acetone	2.0	"
D037 Pentachlorophenol	100.0	"
D038 Pyridine	3.0	"
D039 Tetrachloroethylene	0.7	"
D040 Trichloroethylene	0.5	"
D041 2,4,5-Trichlorophenol	400.0	"
D042 2,4,6-Trichlorophenol	2.0	"
D043 Vinyl Chloride	0.2	"

For Internal Use Only

E RCRA CHARACTERIZATION

1. Is this material a "Hazardous Waste" under 40CFR 261.17?

2. Is this a "Characteristic Waste"?

If "Yes" is it: ☐ D001 Ignitable ☐ D002 Corrosive ☐ D003 Reactive

☒ D004 - D003 Toxic, give specific codes: D004, D008

3. Is this an "F" or a "K" waste or mixed with one?

If "Yes" give waste codes from 40CFR 261.31 and/or 261.32: _____

4. Is this a commercial chemical product or spill cleanup that would carry a "U" or "P" waste code under 40CFR 261.33 (e) or (f)?

If "Yes" give the waste code: _____

5. Is this a state regulated waste?

If "Yes" give code: _____

DOT CHARACTERIZATION

1. Is this a "Hazardous Substance/Mixture/Pollutant" as defined in 49CFR D.O.T.?

2. If "Yes" give the proper D.O.T. Shipping Description from 49CFR 172.101:

RQ, Hazardous Waste Solids, NOS (Lead/Arsenic) UN 3077

3. Hazard Class: 9 RQ (11b, Packaging Group: III)

4. Give the two primary hazardous constituents: Lead arsenic D008, D004

GENERATOR CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

NAME (Print) Michael E Lee TITLE EPS/SM
DATE 10/26/2000

Date Received _____

Date Approved _____

Treatment Method _____

Company Name _____

Waste Common Name _____

Sample Collected By _____

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No. 01797		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot caretaker DLA 2103 Airways Blvd, Memphis, TN, 38114						State Hazardous Waste Number					
4. Generator's Phone (901) 544-0612						State Generator's ID					
5. Transporter 1 Company Name Pollution Control Industries						State Transporter's ID					
6. US EPA ID Number IND 000646943						State Transporter's ID					
7. Transporter 2 Company Name						State Transporter's ID					
8. US EPA ID Number						State Transporter's ID					
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-Far-Drive, Millington, TN, 38053						State Facility's ID					
10. US EPA ID Number TN000772100						State Facility's ID					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. <input checked="" type="checkbox"/> RQ, Hazardous Waste Solids, n.o.s. (Lead/Arsenic) 0, NA3077, PG III, ERG171						No. Type					
						001 TP		00020		P	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information											
24 Hour Emergency Contact: , , Need CD											
DLA 800-851-8061 or Mike Lee 901-544-0612 or Frank Johnson 703-625-3792											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.											
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 Michael E. Lee						Signature Michael E. Lee			Month Day Year 11/02/00		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name Charles McVay						Signature Charles McVay			Month Day Year 11/02/00		
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name						Signature			Month Day Year		
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.											
Printed/Typed Name						Signature			Month Day Year		

654 552



FORUM CONSTRUCTION SERVICES
4343 Kennedy Ave., East Chicago, IN 46312
Telephone: (219) 397-3951 FAX: (219) 397-6411
(800) 388-7242

MATERIAL DATA SURVEY

PCI

Memphis Depot Caretaker Division-

Generator Name: Defense Logistic Agency Billing Name: Innovative Waste Mgmt. Inc.
 Street: 2163 Airways Blvd. Bldg. 144 Street P. O. Box 50397
 City: Memphis State: TN Zip: 38114-5211 City: Summerville State: SC Zip: 29485
 Technical Contact: Mike Lee Title: Enviro. Mgr. Phone: 901-544-0611 Fax: 901-745-4280
 Federal EPA ID No.: TN4210020570 State ID No.: _____ S.I.C. Code: 9711 Form Code R: _____
☐ Check if you are a Conditionally Exempt Small Quantity Generator PCI Sales Rep. TH

Common Name of Waste: Toxic characteristic soil
 Original Process Generating Waste (must be specific): Clean up of soil contaminated with toxic metals and hazardous materials.

Method of Shipment ☐ Drum (s) ☒ Bulk 40 ton Quantity _____ per ☐ Wk ☐ Mo ☐ Qtr ☒ Yr ☐ One-time
 MSDS Attached? ☐ Yes ☒ No TCLP Attached? ☒ Yes ☐ No ☐ Check if sample has been submitted

I. PHYSICAL PROPERTIES @ 25°C (77°F)

Color: Brown/Black % Total Halogens: 0 Specific Gravity: 13.86 lbs
 per gal.
 Physical State: ☐ Solid ☐ Liquid ☐ Gas ☐ Other _____
 Phase/Layers: ☐ Single ☐ Multiple _____
 % Liquid: 100 % Solid: _____
 % Other, describe: _____

II. CHEMICAL COMPOSITION

(List hazardous inorganic and organic components and corresponding ranges.)

Soil/dirt _____ 99-100%
Glass _____ <1%
Sodium Hydroxide _____ <1%

OTHER COMPONENTS TOTAL (PPM)

NAME	YES	NO	YES	NO
CHLORIDE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SULFIDE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
REACTIVE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
OTHER	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAZARDOUS PROPERTIES	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
WATER REACTIVE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
OXIDIZING	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EXPLOSIVE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
POLYMERIZABLE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PHOTOSENSITIVE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
FLAMMABLE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
TOXIC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
OTHER	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

E. RCRA CHARACTERIZATION

- Is this material a "Hazardous Waste" under 40CFR 261.17? ☒ Yes ☐ No
- Is this a "Characteristic Waste"? ☒ Yes ☐ No
- If "Yes" is it: ☐ D001 Ignitable ☐ D002 Corrosive ☐ D003 Reactive ☒ D004 - D003 Toxic, give specific codes: D004, D008
- Is this an "F" or a "K" waste or mixed with one? ☐ Yes ☒ No
- If "Yes" give waste codes from 40CFR 261.21 and/or 261.32: _____
- Is this a commercial chemical product or solid cleanup that would carry a "U" or "P" waste code under 40CFR 261.33 (a) or (f)? ☐ Yes ☒ No
- If "Yes" give the waste code: _____
- Is this a state regulated waste? ☐ Yes ☒ No
- If "Yes" give codes: _____

DOT CHARACTERIZATION

- Is this a "Hazardous Substance/Marine Pollutant" as defined in 49CFR D.O.T.? ☒ Yes ☐ No
- If "Yes" give the proper D.O.T. Shipping Description from 49CFR 172.101: RQ, Hazardous Waste Solids, NOS (Lead/Arsenic) UNNA #: NA3077
- Hazard Class: 9 III, Packaging Group: III
- Give the two primary hazardous constituents: Lead arsenic D008, D004

GENERATOR CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

NAME (Print): Michael E Lee TITLE: EPS/SM
 DATE: 10/26/2000

D. Based on knowledge or analysis, provide an accurate value or range for TCLP concentrations or total metal concentrations in ppm.

INORGANIC CHARACTERISTICS

NAME	CONCENTRATION (PPM)
0001 Arsenic	5.0 0-60
0003 Barium	100.0 BRL
0006 Cadmium	1.0
0007 Chromium	5.0
0008 Lead	5.0 5-80
0009 Mercury	0.2 BRL
0010 Selenium	1.0
0011 Silver	5.0
Copper	100.0
Zinc	500.0

ORGANIC CHARACTERISTICS

NAME	CONCENTRATION (PPM)
0012 Endrin	0.02 BRL
0013 Lindane	0.4
0014 Dieldrin	10.0
0015 Toxaphene	0.5
0016 2,4-Dichlorophenoxyacetic Acid	10.0
0017 2,4,5-TP (Silvex)	1.0
0018 Benzene	0.5
0019 Carbon Tetrachloride	0.5
0020 Chloroform	0.03
0021 Chlorobenzene	100.0
0022 Chloroform	6.0
0023 o-Cresol	200.0
0024 m-Cresol	200.0
0025 p-Cresol	200.0
0026 Cresol	200.0
0027 1,4-Dichlorobenzene	7.5
0028 1,2-Dichloroethane	0.5
0029 1,1-Dichloroethylene	0.7
0030 2,4-Dichlorophenol	0.13
0031 Heptachlor (and it's isomers)	0.008
0032 Heptachlorobenzene	0.13
0033 Heptachlorobutadiene	0.5
0034 Heptachloroethane	3.0
0035 Methyl Ethyl Ketone	200.0
0036 Nitrobenzene	2.0
0037 Heptachloroepoxide	100.0
0038 Pyridine	5.0
0039 Tetrachloroethylene	0.7
0040 Trichloroethylene	0.5
0041 2,4,5-Trichlorophenol	400.0
0042 2,4,6-Trichlorophenol	2.0
0043 Vinyl Chloride	0.2

For Internal Use Only

Date Received: _____

Date Approved: _____

Treatment Method: _____

Company Name: _____

Waste Common Name: _____

Sample Collected By: _____

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570	Manifest Document No. 01708	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd, Memphis, TN, 38114			A. State/Manifest Document Number		
4. Generator's Phone (901) 544-0612			B. State Generator ID		
5. Transporter 1 Company Name Pollution Control Industries			C. State Transporter ID		
6. US EPA ID Number TN0000646943			D. Transporter 1 Code		
7. Transporter 2 Company Name			E. State Transporter ID		
8. US EPA ID Number			F. Transporter 2 Code		
9. Designated Facility Name and Site Address Pollution Control Ind-TN 5405 Tay-Far-Drive, Millington, TN, 38053			G. State Facility ID		
10. US EPA ID Number TN0000772100			H. Facility Phone 901-544-5200		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	RM, Hazardous Waste Solids, n.e.s., (Lead/Arsenic) 9, NA3077, PG III, ERG171	001	TP	00020	P
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: , , Need CD DLA 800-851-8061 Mike lee 901-544-0612 or Frank Johnson 703-625-3792					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael E. Lee		Signature Michael E. Lee		Month Day Year 1/01/27/00	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Charles McVay		Month Day Year 1/02/21/00	
Printed/Typed Name Charles McVay		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1

Generator Name/Location

Memphis Depot Caretaker DLA 2163 Airways Blvd, Memphis, TN

EPA ID Number TN4210020570

Manifest Number 01708

Waste Analysis Available: ☒ Yes ☐ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003* D004-D043
				Non-wastewater >1% TOC & >1% TSS e	Wastewater f		
203864	b	c D004,D008	D	NWW		List all applicable constituents from key below g	List all applicable constituents from Table I h 231,239

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature

Print Name

Date

10/27/2000

654 555



POLLUTION CONTROL ASSOCIATES
1043 Kennedy Ave., East Chicago, IN 46312
Telephone: (219) 397-3951 FAX: (219) 397-6411
(800) 388-7242

MATERIAL DATA SURVEY

PCI

Memphis Depot Caretaker Division-

Generator Name: Defense Logistic Agency Bldg Name: Innovative Waste Mgmt. Inc.
Street: 2163 Airways Blvd. Bldg. 144 Street: P. O. Box 50397
City: Memphis State: TN Zip: 38114-5210 City: Summerville State: SC Zip: 29485
Technical Contact: Mike Lee Title: Enviro. Mgr. Phone: 901-544-0611 Fax: 901-745-4280
Federal EPA ID No.: TN4210020570 State ID No.: _____ S.I.C. Code: 9711 Form Code R: _____
☐ Check if you are a Conditionally Exempt Small Quantity Generator PCI Sales Rep. TH

Common Name of Waste: Toxic characteristic soil
Original Process Generating Waste (must be specific): Clean up of soil contaminated with toxic metals and hazardous materials.

Method of Shipment: ☐ Drum (s) ☒ Bulk 140 ton Quantity _____ per ☐ Wk ☐ Mo ☐ Qtr ☒ Yr ☐ One-time
MSDS Attached? ☐ Yes ☒ No TCLP Attached? ☒ Yes ☐ No ☐ Check if sample has been submitted

I. PHYSICAL PROPERTIES @ 25°C (77°F)

Color: Brown/Black % Total Halogens: 0 Specific Gravity: 13.86 lbs
per gal.
DOT (see container label) ☐ None ☐ Gas ☐ Solid ☐ Sludge
Physical State _____ Phase/Layer: _____
% Liquid _____ % Sludge ☐ Single
100 % Solid _____ % Powder ☐ Multiple how many _____
% Other, describe _____

II. CHEMICAL COMPOSITION

(List hazardous components and corresponding codes)

Soil/dirt 99-100
Glass <1
Sodium Hydroxide <1

OTHER COMPONENTS TOTAL (PPM)

NO	YES	NO	YES
CYANIDE	<input type="checkbox"/>	ARSENIC	<input type="checkbox"/>
SILIDES	<input type="checkbox"/>	PCBS	<input type="checkbox"/>
REACTIVE	<input type="checkbox"/>	PCBS	<input type="checkbox"/>
REACTIVE	<input type="checkbox"/>	PCBS	<input type="checkbox"/>
REACTIVE	<input type="checkbox"/>	PCBS	<input type="checkbox"/>
REACTIVE	<input type="checkbox"/>	PCBS	<input type="checkbox"/>

HAZARDOUS PROPERTIES

☐ NONE ☐ BENZENE ☐ PCBS
☐ W/IN REACTIVE ☐ AIR REACTIVE ☐ EXPLOSIVE
☐ SHOCK SENSITIVE ☐ PYROPHORIC ☐ POLYMERIZABLE
☐ RADIOACTIVE ☐ FLUORIDE ☐ PATHOGEN
☐ CORROSIVE ☐ ENDOLOGICAL ☐ BIOLOGICAL
☐ DIOXINS OTHER _____

Total of Maximum concentration must be 2 100%

E. RCRA CHARACTERIZATION

- Is this material a "Hazardous Waste" under 40CFR 261.17?
- Is this a "Characteristic Waste"?
If "Yes" is it: ☐ D001 Ignitable ☐ D002 Corrosive ☐ D003 Reactive
☒ D004 - D003 Toxic, give specific codes: D004, D008
- Is this an "F" or a "K" waste or mixed with one?
If "Yes" give waste codes from 40CFR 261.21 and/or 261.32: _____
- Is this a commercial chemical product or soil cleanup that would carry a "U" or "P" waste code under 40CFR 261.33 (a) or (f)?
If "Yes" give the waste code: _____
- Is this a state regulated waste?
If "Yes" give codes: _____

DOT CHARACTERIZATION

- Is this a "Hazardous Substance/Marine Pollutant" as defined in 49CFR D.O.T.?
- If "Yes" give the proper D.O.T. Shipping Description from 49CFR 172.101:
RG, Hazardous Waste Solids, NOS (lead/arsenic) UN 3077
- Hazard Class: 9 RG (1) lb. Packaging Group: III
- Give the two primary hazardous constituents: lead arsenic D008, D004

GENERATOR CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

NAME (Print): Michael E Lee TITLE: EPS/SM
DATE: 10/26/2000

D. Based on knowledge or analysis, provide an accurate value or range for TCLP concentrations or total metal concentrations in ppm.

ORGANIC CHARACTERISTICS

D004	Arsenic	5.0	0-60
D005	Barium	100.0	BRI
D006	Cadmium	1.0	"
D007	Chromium	5.0	"
D008	Lead	5.0	5-80
D009	Mercury	0.2	BRI
D010	Selenium	1.0	"
D011	Silver	5.0	"
	Copper	100.0	"
	Zinc	500.0	"

ORGANIC CHARACTERISTICS

D012	Endrin	0.02	BRI
D013	Lindane	0.1	"
D014	Methoxychlor	10.0	"
D015	Toxaphene	0.5	"
D016	2,4-Dichlorophenoxyacetic Acid	10.0	"
D017	2,4,5-TP (Savex)	1.0	"
D018	Benzene	0.5	"
D019	Carbon Tetrachloride	0.5	"
D020	Chloroform	0.03	"
D021	Chlorobenzene	100.0	"
D022	Chloroform	6.0	"
D023	o-Cresol	200.0	"
D024	m-Cresol	200.0	"
D025	p-Cresol	200.0	"
D026	Cresol	200.0	"
D027	1,4-Dichlorobenzene	7.5	"
D028	1,2-Dichloroethane	0.5	"
D029	1,1-Dichloroethylene	0.7	"
D030	2,4-Dichlorobenzene	0.13	"
D031	Dieldrin (and its isomers)	0.008	"
D032	Heptachlorobenzene	0.13	"
D033	Heptachlorobenzene	0.5	"
D034	Heptachlorobenzene	3.0	"
D035	Methyl Ethyl Ketone	200.0	"
D036	Nonachlor	2.0	"
D037	Perchlorophenol	100.0	"
D038	Pyridine	5.0	"
D039	Tetrachloroethylene	0.7	"
D040	Trichloroethylene	0.5	"
D041	2,4,5-Trichlorophenol	400.0	"
D042	2,4,6-Trichlorophenol	2.0	"
D043	Vinyl Chloride	0.2	"

For Internal Use Only

Date Received _____

Date Approved _____

Treatment Method _____

Company Name _____

Waste Common Name _____

Sample Collected By _____

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN0210020570		Manifest Document No. 01700		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Cavalier DLA 2103 Airways Blvd, Memphis, TN, 38114		4. Generator's Phone (901) 544-0612		5. Transporter 1 Company Name Pollution Control Inc		6. US EPA ID Number TND000646943		7. Transporter 2 Company Name	
9. Designated Facility Name and Site Address Pollution Control Inc-TN 5405 Tay-Far-Gate, Millington, TN, 38053		10. US EPA ID Number TND000772100		11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity	
						No. Type		Unit Wt/Vol	
a. <input checked="" type="checkbox"/> RD, Hazardous Waste Solids, n.e.s., (Leak/Spills) 9, UN3077, PG II, ER0171						00.1 TP		0.0020 P	
b.									
c.									
d.									
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: , , Need CD DLA 800-851-8061 Mike Lee 901-544-0612 or Frank Johnson 703-625-3792									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael E. Lee					Signature Michael E. Lee				
					Month Day Year 1/16/30/00				
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name Charles McVar					Signature Charles McVar				
					Month Day Year 1/10/30/00				
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name					Signature				
					Month Day Year				
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name					Signature				
					Month Day Year				

X

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Print Name _____

Michael E. Lee

Date _____

10/30/2000

654 558



POLLUTION CONTROL INDUSTRIES
1043 Kennedy Ave., Suite Chicago, IL 60612
Telephone: (219) 397-3951 FAX: (219) 397-6411
(800) 388-7242

MATERIAL DATA SURVEY

PCI

Memphis Depot Caretaker Division-

Generator Name: Defense Logistic Agency Billing Name: Innovative Waste Mgmt. Inc.
Street: 2163 Airways Blvd. Bldg. 144 Street P. O. Box 50397
City: Memphis State: TN Zip: 38114-521 City: Summerville State: SC Zip: 29485
Technical Contact: Mike Lee Title: Enviro. Mgr. Phone: 901-544-061 Fax: 901-745-4280
Federal EPA ID No.: TN4210020570 State ID No.: _____ S.I.C. Code: 9711 Form Code R: _____

☐ Check if you are a Conditionally Exempt Small Quantity Generator
PCI Sales Rep. THCommon Name of Waste: Toxic characteristic soil

Original Process Generating Waste (must be specific): Clean up of soil contaminated with toxic metals and hazardous materials.

Method of Shipment: ☐ Drum(s) ☒ Bulk 140 ton Quantity _____ per ☐ Wk ☐ Mo ☐ Qtr ☒ Yr ☐ One-time

MSDS Attached? ☐ Yes ☒ NoTCLP Attached? ☒ Yes ☐ No☐ Check if sample has been submitted

PHYSICAL PROPERTIES @ 25°C (77°F)

Color: Brown/Black % Total Halogens: 0 Specific Gravity: 13.86 lbs
per gal.
Physical State: ☐ Solid ☐ Liquid ☐ Gas ☐ Slurry
Phase/Layers: _____
% Liquid: _____ % Sludge: _____ Single
100 % Solid _____ % Powder: _____ Multiple: _____
% Other, describe: _____

CHEMICAL COMPOSITION

(List inorganic by pH is for reactive components and corresponding hazard)

Soil/dirt 99.100
Glass 0.1
Sodium Hydroxide 0.1

OTHER COMPONENTS TOTAL (PPM)

HAZARDOUS PROPERTIES
☐ NONE ☐ BENZENE ☐ POLYMERIZABLE
☐ HIGHLY REACTIVE ☐ AN REACTIVE ☐ POLYMERIZABLE
☐ RADIOACTIVE ☐ PATHOGEN
☐ CORROSIVE ☐ BIOLOGICAL
☐ DIOXIN

D. Based on knowledge or analysis, provide an accurate value or value for TCLP concentrations or total metal concentrations in ppm.

INORGANIC CHARACTERISTICS

0004	Arsenic	5.0	0-60
0005	Barium	100.0	BRL
0006	Cadmium	1.0	"
0007	Chromium	5.0	"
0008	Lead	5.0	5-80
0009	Mercury	0.2	BRL
0010	Selenium	1.0	"
0011	Silver	5.0	"
	Copper	100.0	"
	Zinc	500.0	"

ORGANIC CHARACTERISTICS

0012	Acetic	0.02	BRL
0013	Urethane	0.1	"
0014	Methylenechloride	10.0	"
0015	Triphenyl	0.5	"
0016	2,4-dichlorophenoxyacetic Acid	10.0	"
0017	2,4,5-TP (Sirtex)	1.0	"
0018	Benzene	0.5	"
0019	Carbon Tetrachloride	0.5	"
0020	Chloroform	0.03	"
0021	Chlorobenzene	100.0	"
0022	Chloroform	6.0	"
0023	o-Cresol	200.0	"
0024	m-Cresol	200.0	"
0025	p-Cresol	200.0	"
0026	Cresol	7.5	"
0027	1,4-Dichlorobenzene	0.5	"
0028	1,2-Dichlorobenzene	0.7	"
0029	1,1-Dichloroethylene	0.13	"
0030	2,4-Dichlorobenzene	0.13	"
0031	Hexachlorocyclopentadiene	0.008	"
0032	Hexachlorobenzene	0.13	"
0033	Hexachlorocyclopentadiene	0.5	"
0034	Hexachlorobenzene	3.0	"
0035	Methyl Ethyl Ketone	200.0	"
0036	Hexachlorocyclopentadiene	2.0	"
0037	Hexachlorocyclopentadiene	100.0	"
0038	Pyridine	5.0	"
0039	Tetrachloroethylene	0.7	"
0040	Tetrachloroethylene	0.5	"
0041	2,4,5-Trichlorophenol	400.0	"
0042	2,4,6-Trichlorophenol	2.0	"
0043	Vinyl Chloride	0.2	"

For Internal Use Only

E. RCRA CHARACTERIZATION

- Is this material a "Hazardous Waste" under 40CFR 261.27?
- Is this a "Characteristic Waste"?
If "Yes" is it: ☐ D001 Ignitable ☐ D002 Corrosive ☐ D003 Reactive
☒ D004 - D005 Toxic, give specific codes: D004, D008
- Is this an "F" or "K" waste or mixed with one?
If "Yes" give waste codes from 40CFR 261.21 and/or 261.32: _____
- Is this a commercial chemical product or soil cleanup that would carry a "U" or "P" waste code under 40CFR 261.33 (a) or (f)?
If "Yes" give the waste code: _____
- Is this a state regulated waste?
If "Yes" give code: _____

DOT CHARACTERIZATION

- Is this a "Hazardous Substance/Marine Pollutant" as defined in 49CFR D.O.T.?
- If "Yes" give the proper D.O.T. Shipping Description from 49CFR 172.101:
RQ, Hazardous Waste Solids, NOS (lead/arsenic) UN 3077
- Hazard Class: 9 (11b, Packaging Group: III)
- Give the two primary hazardous constituents: lead arsenic D008, D004

GENERATOR CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

NAME (Print) Michael E Lee TITLE EPS/SM
DATE 10/26/2000

Company Name _____

Waste Common Name _____

Sample Collected By _____

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN0210020570		Manifest Document No. 01710		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot Cavalier DLA 2103 Airways Blvd, Memphis, TN, 38114						4. State Manifest Document Number					
4. Generator's Phone (901) 544-0612						5. State Generator's ID					
5. Transporter 1 Company Name Pollution Control Industries						6. US EPA ID Number TN0000646943					
7. Transporter 2 Company Name						8. US EPA ID Number					
9. Designated Facility Name and Site Address Pollution Control Ind-TN 5405 Top-Fer-Drive, Millington, TN, 38053						10. US EPA ID Number TN0000772100					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit	
						No. Type				Wt/Vol	
a. <input checked="" type="checkbox"/> RG, Hazardous Waste Solids, n.e.s. (Acid/Arsenic) 9, 100077, PG III, ERS171						001 TP		00020		P	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: , , Need CD DLA 800-851-8061 Mike Lee 901-544-0612 or Frank Johnson 703-625-3792											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael E. Lee						Signature <i>Michael E. Lee</i>			Month Day Year 10/30/90		
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Charles McVay			Signature <i>Charles McVay</i>		
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name			Signature		
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		



LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1

Generator Name/Location

Memphis Depot Caretaker DLA 2163 Airways Blvd, Memphis, TN

EPA ID Number TN4210020570

Manifest Number

Q1710

Waste Analysis Available:

☐ Yes

☐ No

☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003*, D004-D043
a	b	c	D	Non-wastewater > 1% TOC & > 1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table 1 h
203864		D004, D008		NWW			231, 239

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true

Signature

Print Name

Michael E. Lee

Date

10/30/2000

654

560

654 561



FEDERAL BUREAU OF INVESTIGATION
4343 Kennedy Avenue East Chicago, IN 46312
Telephone: (219) 397-3951 FAX: (219) 397-6411
(800) 368-7242

MATERIAL DATA SURVEY

PCI

Memphis Depot Caretaker Division-

Generator Name: Defense Logistic Agency Billing Name: Innovative Waste Mgmt. Inc.
Street 2163 Airways Blvd. Bldg. 144 Street P. O. Box 50397
City Memphis State TN Zip 38114-5211 City Summerville State SC Zip 29485
Technical Contact: Mike Lee Title: Enviro. Mgr. Phone: 901-544-0617 Fax: 901-745-4280
Federal EPA ID No.: TN4210020570 State ID No.: _____ S.I.C. Code: 9711 Form Code R: _____
☐ Check if you are a Conditionally Exempt Small Quantity Generator PCI Sales Rep. TH

Common Name of Waste Toxic characteristic soil
Original Process Generating Waste (must be specific) Clean up of soil contaminated with toxic metals and hazardous materials.

Method of Shipment ☐ Drum (s) ☒ Bulk 140 ton Quantity _____ per ☐ Wk ☐ Mo ☐ Qtr ☒ Yr ☐ One-time
MSDS Attached? ☐ Yes ☒ No TCLP Attached? ☒ Yes ☐ No ☐ Check if sample has been submitted

PHYSICAL PROPERTIES @ 25°C (77°F)

Color: Brown/Black % Total Halogens: 0 Specific Gravity: 13.86 lbs
per gal.
Physical State ☐ Solid ☐ Liquid ☐ Gas ☐ Strong Phase/Layers _____
% Liquid _____ % Sludge ☐ Single _____
100 % Solid _____ % Powder ☐ Solidify how many _____
% Other substance _____

CHEMICAL COMPOSITION

(List hazardous by name as well as inorganic components and corresponding values.)

Soil/dirt _____ 99-100
Glass _____ <1
Sodium Hydroxide _____ <1

OTHER COMPONENTS TOTAL (PPM)

NO	YES	NO	YES
CYANIDE	<input type="checkbox"/>	AMIDES	<input type="checkbox"/>
SILIDES	<input type="checkbox"/>	PCBS	<input type="checkbox"/>
REACTIVE	<input type="checkbox"/>	PHENOLICS	<input type="checkbox"/>
OTHER	<input type="checkbox"/>	OTHER	<input type="checkbox"/>

HAZARDOUS PROPERTIES

☒ NONE ☐ BENZENE ☐ HIGHLY FLAMMABLE
☐ WATER REACTIVE ☐ AIR REACTIVE ☐ EXPLOSIVE
☐ SHOCK SENSITIVE ☐ PYROPHORIC ☐ POLYMERIZABLE
☐ RADIOACTIVE ☐ PATHOGENIC ☐ PATHOGEN
☐ CORROSIVE ☐ BIOLOGICAL
☐ DANGEROUS ☐ OTHER

Total of hazardous concentration must be 2 000%

E. RCRA CHARACTERIZATION

- Is this material a "Hazardous Waste" under 40CFR 261.37?
☒ Yes ☐ No
- Is this a "Characteristic Waste"?
If "Yes" is it: ☐ D001 Ignitable ☐ D002 Corrosive ☐ D003 Reactive
☒ D004 - D003 Toxic, give specific codes: D004, D008
- Is this an "F" or a "K" waste or mixed with one?
If "Yes" give waste codes from 40CFR 261.31 and/or 261.32: _____
- Is this a commercial chemical product or soil cleanup that would carry a "U" or "P" waste code under 40CFR 261.33 (e) or (f)?
If "Yes" give the waste code: _____
- Is this a state regulated waste?
If "Yes" give codes: _____

DOT CHARACTERIZATION

- Is this a "Hazardous Substance/Marine Pollutant" as defined in 49CFR 172.101?
☒ Yes ☐ No
- If "Yes" give the proper D.O.T. Shipping Description from 49CFR 172.101:
RQ, Hazardous Waste Solids, NOS (Lead/arsenic) UNNA: NA3077
- Hazard Class: 9 Packaging Group: III
- Give the two primary hazardous constituents: Lead arsenic D008, D004

GENERATOR CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

NAME (Print) Michael E Lee TIME EPS/SM
DATE 10/26/2000

D. Based on knowledge or analysis, provide an accurate value for TCLP concentrations or total metal concentrations in ppm.

INORGANIC CHARACTERISTICS

CONCENTRATION (PPM)	CONCENTRATION (PPM)
0001 Arsenic	5.0 0-60
0005 Barium	100.0 BRL
0006 Cadmium	1.0
0007 Chromium	5.0
0008 Lead	5.0 5-80
0009 Mercury	0.2 BRL
0010 Selenium	1.0
0011 Silver	5.0
Copper	100.0
Zinc	500.0

ORGANIC CHARACTERISTICS

CONCENTRATION (PPM)	CONCENTRATION (PPM)
0012 Endrin	0.02 BRL
0013 Lindane	0.4
0014 Methoxychlor	10.0
0015 Toxaphene	0.5
0016 2,4-Dichlorophenoxyacetic Acid	10.0
0017 2,4,5-TP (Silvex)	1.0
0018 BHCs	0.5
0019 Carbon Tetrachloride	0.5
0020 Chlorobenzene	0.03
0021 Chlorobenzene	100.0
0022 Chloroform	6.0
0023 o-Cresol	200.0
0024 m-Cresol	200.0
0025 p-Cresol	200.0
0026 Cresol	200.0
0027 1,4-Dichlorobenzene	7.5
0028 1,2-Dichlorobenzene	0.5
0029 1,1-Dichloroethylene	0.7
0030 2,4-Dinitrophenol	0.13
0031 Heptachlor (and its isomers)	0.008
0032 Heptachlorobenzene	0.13
0033 Heptachlorobenzene	0.5
0034 Heptachlorobenzene	3.0
0035 Methyl Ethyl Ketone	200.0
0036 Nitrobenzene	2.0
0037 p-Nitrophenol	100.0
0038 Pyridine	5.0
0039 Trichloroethylene	0.7
0040 Trichloroethylene	0.5
0041 2,4,5-Trichlorophenol	400.0
0042 2,4,6-Trichlorophenol	2.0
0043 Vinyl Chloride	0.2

For Internal Use Only

Date Received _____
Date Approved _____
Treatment Method _____

Company Name _____
Waste Common Name _____
Sample Collected By _____

3. Generator's Name and Mailing Address <div style="text-align: center; font-weight: bold; font-size: 1.2em;">654 562</div> Memphis Depot Container DLA 2193 Airways Blvd., Memphis, TN, 38114		4. Generator's Phone (901) 544-0612	
5. Transporter 1 Company Name <i>Pollution Control Industries</i>		6. US EPA ID Number <i>TLN0000646943</i>	
7. Transporter 2 Company Name		8. US EPA ID Number	
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5496 Toy-Far-Drive, Millington, TN, 38053		10. US EPA ID Number TNED00772100	

a.	b.	c.	d.	12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Hazardous Waste Code
				No.	Type			
X				001	TP	00020	P	

15. Special Handling Instructions and Additional Information

24 Hour Emergency Contact: , , Need CD DLA 800-851-8061
Mike Lee 901-544-0612 or Frank Johnson 703-625-3792

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
 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.

17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: <i>Michael E. Lee</i>	Signature: <i>Michael E. Lee</i> Month Day Year: <i>11/13/10</i>
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: <i>Charles McVay</i>	Signature: <i>Charles McVay</i> Month Day Year: <i>11/13/10</i>

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: _____



ORIGINAL-RETURN TO GENERATOR



FORNATION CONTROL SERVICES
4343 Kennedy Ave., Suite Chicago, IL 60632
Telephone: (312) 397-3951 FAX: (312) 397-6411
(800) 388-7242

MATERIAL DATA SURVEY

654 564

PCI

Memphis Depot Caretaker Division-

Generator Name: Defense Logistic Agency Billing Name: Innovative Waste Mgmt. Inc.
Street 2163 Airways Blvd. Bldg. 144 Street P. O. Box 50397
City Memphis State TN Zip 38114-5210 City Summerville State SC Zip 29485
Technical Contact: Mike Lee Title: Enviro. Mgr. Phone: 901-544-0611 Fax: 901-745-4280
Federal EPA ID No.: TN4210020570 State ID No.: _____ S.I.C. Code: 9711 Form Code R: _____

☐ Check if you are a Conditionally Exempt Small Quantity Generator

PCI Sales Rep. TH

Common Name of Waste Toxic characteristic soil

Original Process Generating Waste (must be specific) Clean up of soil contaminated with toxic metals and hazardous materials.

Method of Shipment ☐ Drum (can) ☒ Bulk 140 ton Quantity _____ per ☐ Wk ☐ Mo ☐ Qtr ☒ Yr ☐ One-time

MSDS Attached? ☐ Yes ☒ No

TCLP Attached? ☒ Yes ☐ No

☐ Check if sample has been submitted

PHYSICAL PROPERTIES @ 25°C (77°F)

Color: Brown/Black % Total Halogens: 0 Specific Gravity: 13.86 lbs
per gal.

Physical State ☐ Solid ☐ Liquid ☐ Gas ☐ Slurry

% Solids _____ % Sludge _____ % Single _____
100 % Sand _____ % Powder _____ % Anhydrous _____

% Other, describe _____

CHEMICAL COMPOSITION

(List inorganic and organic components and concentrations in %)

Soil/dirt _____ 99.100

Glass _____ .1

Sodium Hydroxide _____ .1

Surf. pH _____ Flashpoint _____
☒ < 5,000 ☐ < 2.0 ☐ < 73°
☐ 5-10,000 ☐ 2.0-12.5 ☐ 73-140°
☐ > 10,000 ☐ > 12.5 ☐ 140-200°
Exact _____ Exact _____ Exact _____

OTHER COMPONENTS TOTAL (PPM)

NO	YES	NO	YES
CYNURGE	<input type="checkbox"/>	NO	<input type="checkbox"/>
HALIDES	<input type="checkbox"/>	NO	<input type="checkbox"/>
REACTIVE	<input type="checkbox"/>	PCBS	<input type="checkbox"/>
OTHERS	<input type="checkbox"/>	PCBS	<input type="checkbox"/>
HALIDES	<input type="checkbox"/>	PCBS	<input type="checkbox"/>

HAZARDOUS PROPERTIES

☐ NONE ☐ BENZENE ☐ PCBS ☐ PCBS ☐ PCBS
☐ WATER REACTIVE ☐ AIR REACTIVE ☐ EXPLOSIVE
☐ SHOCK SENSITIVE ☐ PYROPHORIC ☐ POLYMERIZABLE
☐ RADIOACTIVE ☐ FLUORIDE ☐ PATHOGEN
☐ CORROSIVE ☐ BIOLOGICAL ☐ BIOLOGICAL
☐ DANGEROUS ☐ OTHER

E. RCRA CHARACTERIZATION

- Is this material a "Hazardous Waste" under 40CFR 261.17? ☒ Yes ☐ No
- Is this a "Characteristic Waste"? ☒ Yes ☐ No
If "Yes" is it: ☐ D001 Ignitable ☐ D002 Corrosive ☐ D003 Reactive
☒ D004 - D005 Toxic, give specific codes: D004, D008
- Is this an "F" or a "K" waste or mixed with one? ☐ Yes ☒ No
If "Yes" give waste codes from 40CFR 261.31 and/or 261.32: _____
- Is this a commercial chemical product or spill cleanup that would carry a "U" or "P" waste code under 40CFR 261.33 (a) or (i)? ☐ Yes ☒ No
If "Yes" give the waste code: _____
- Is this a state regulated waste? ☐ Yes ☒ No
If "Yes" give code: _____

DOT CHARACTERIZATION

- Is this a "Hazardous Substance/Marine Pollutant" as defined in 49CFR D.O.T.? ☒ Yes ☐ No
- If "Yes" give the proper D.O.T. Shipping Description from 49CFR 172.101:
RQ, Hazardous Waste Solids, NOS (Lead/Arsenic) UNNA: NA3077
- Hazard Class: 9 Packaging Group: III
- Give the two primary hazardous constituents: Lead arsenic D008, D004

GENERATOR CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed.

I also certify that the obtained sample is representative of the waste material described above and give PCI permission and consent to make amendments and corrections.

NAME (Print) Michael E Lee TITLE EPS/SM
DATE 10/26/2000

Based on knowledge or analysis, provide an accurate value or value for TCLP concentrations or total metal concentrations in ppm.

INORGANIC CHARACTERISTICS

CODE	NAME	CONC.	UNIT
D001	Acetic	5.0	0-60
D002	Borates	100.0	BRL
D003	Chlorides	1.0	"
D004	Chromium	5.0	"
D005	Lead	5.0	5-80
D006	Mercury	0.2	BRL
D007	Selenium	1.0	"
D008	Silver	5.0	"
D009	Copper	100.0	"
D010	Zinc	500.0	"

ORGANIC CHARACTERISTICS

CODE	NAME	CONC.	UNIT
D011	Endrin	0.02	BRL
D012	Lindane	0.4	"
D013	Methoxychlor	10.0	"
D014	Permethrin	0.5	"
D015	2,4-Dichlorophenoxyacetic Acid	10.0	"
D016	2,4,5-TP (Silvex)	1.0	"
D017	Benzo	0.5	"
D018	Carbon Tetrachloride	0.5	"
D019	Chlorobenzene	0.03	"
D020	Chlorobenzene	100.0	"
D021	Chlorobenzene	6.0	"
D022	o-Cresol	200.0	"
D023	m-Cresol	200.0	"
D024	p-Cresol	200.0	"
D025	Cresol	200.0	"
D026	1,4-Dichlorobenzene	7.5	"
D027	1,2-Dichlorobenzene	0.5	"
D028	1,1-Dichloroethane	0.7	"
D029	2,4-Dichlorobenzene	0.13	"
D030	Heptachlor (and it's isomers)	0.008	"
D031	Heptachlorobenzene	0.13	"
D032	Heptachlorobenzene	0.5	"
D033	Heptachlorobenzene	3.0	"
D034	Methyl Ethyl Ketone	200.0	"
D035	Hexachlorocyclopentadiene	2.0	"
D036	Endrin	100.0	"
D037	Pyridine	5.0	"
D038	Tetrachloroethylene	0.7	"
D039	Trichloroethylene	0.5	"
D040	2,4,5-Trichlorophenol	400.0	"
D041	2,4,6-Trichlorophenol	2.0	"
D042	2,4,6-Trichlorophenol	0.2	"
D043	Vinyl Chloride	0.2	"

For Internal Use Only

Date Received _____

Date Approved _____

Treatment Method _____

Company Name _____

Waste Common Name _____

Sample Collected By _____

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No. 02061	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA Memphis, TN, 38114					A. State Manifest Document Number		
4. Generator's Phone (901) 544-0612					B. State Generator's ID		
5. Transporter 1 Company Name ACTION Resources INC					C. State Transporter's ID		
6. US EPA ID Number AI R 00000 7137					D. Transporter's Phone		
7. Transporter 2 Company Name					E. State Transporter's ID		
8. US EPA ID Number					F. Transporter's Phone		
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053					G. State Facility's ID		
10. US EPA ID Number TND000772188					H. Facility's Phone		
					901-451-5201		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers	13. Total Quantity	14. Unit Wt/Vol
					No.	Type	
a.	<div style="border: 1px solid black; padding: 2px;"> <input checked="" type="checkbox"/> Waste Toxic Solids, Organic, n.o.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154 </div>					CM	T
b.							
c.							
d.							
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 <div style="text-align: right;">GG0101042</div>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee				Signature <i>Michael Lee</i>		Month Day Year 10/1/8101	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name Leon Garmon				Signature <i>Leon Garmon</i>		Month Day Year 10/1/8101	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		Month Day Year	

654 565

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No. 02062		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number					
4. Generator's Phone (901) 544-0612						B. State Generator's ID					
5. Transporter 1 Company Name <i>Action Resources Inc</i>						C. State Transporter's ID					
6. US EPA ID Number <i>7237</i>						D. Transporter's Phone / Fax <i>901-321-2445</i>					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address Position Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053						G. State Facility ID					
10. US EPA ID Number TND000772188						H. Facility's Phone					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
						No.	Type				
a. <input checked="" type="checkbox"/> Waste Toxic Solids, Organic, n.e.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154						001		CM		00020 00001	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 <i>Michael Lee</i>						Signature <i>Michael Lee</i>			Month Day Year <i>01/19/04</i>		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name <i>Leon Gorman</i>						Signature <i>Leon Gorman</i>			Month Day Year <i>01/19/04</i>		
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name						Signature			Month Day Year		
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19											
Printed/Typed Name						Signature			Month Day Year		

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1

Generator Name/Location Memphis Depot Caretaker DLA / Memphis, TNEPA ID Number TN 4210020570 Manifest Number 02062Waste Analysis Available: Yes ☒ No ☐ On file at facility ☐

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003*, D004-D043
a	b	c	D	Non-wastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table 1 h
209401 NS	✓						✓

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Michael Lee Print Name Michael LeeDate 01/19/2002

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No TN4210020570		Manifest Document No. 02083		2 Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number							
4. Generator's Phone (901) 544-0612						B. State Generator's ID							
5. Transporter 1 Company Name Action Resources Inc						C. State Transporter's ID							
6. US EPA ID Number ALR000007837						D. Transporter's Phone 800-228-2845							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053						G. State Facility's ID							
10. US EPA ID Number TND000772186						H. Facility's Phone 901-353-5281							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <input checked="" type="checkbox"/> Waste-Toxic Solids, Organic, n.e.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154						No. 001 Type CM		20020		4			
b.													
c.													
d.													
16. Additional Descriptions for Materials Shipped in Bulk						17. Additional Descriptions for Materials Shipped in Bulk							
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 <div style="text-align: right;">GG0101042</div>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee						Signature <i>Michael Lee</i>				Month Day Year 10/22/01			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>Leon L. Lamm</i>				Month Day Year 6/12/01			
Printed/Typed Name Leon Lamm						Signature				Month Day Year			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature				Month Day Year			
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name						Signature				Month Day Year			

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Caretaker DLA / Memphis, TNEPA ID Number TN 4210020570 Manifest Number 02063Waste Analysis Available: Yes ☒ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001, D002, D003, D004, D005
a	b	c	D	Non-wastewater >1% TOC & >1% TSS	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table 1 h
209401 NS	<input checked="" type="checkbox"/>						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature [Signature]Print Name Michael LeeDate 9/22/01

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No. 02064		2. Page 1 1		Information in the shaded areas is not required by Federal law			
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						State Manifest Document Number					
4. Generator's Phone (901) 544-0612						State Manifest Document Number					
5. Transporter 1 Company Name Action Resources						6. US EPA ID Number ALR000007237					
7. Transporter 2 Company Name						8. US EPA ID Number					
9. Designated Facility Name and Site Address Pollution Control Inc-TN 5485 Tay-For-Drive, Millington, TN, 38053						10. US EPA ID Number TND000772188					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. <input checked="" type="checkbox"/> Waste Toxic Solids, Organic, n.e.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2611, PG II, ERG154						No. Type 001 CM		0.0020		Y	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael E Lee						Signature <i>Michael E Lee</i>			Month Day Year 10/12/01		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name SCOTT UPTON						Signature <i>Scott Upton</i>			Month Day Year 10/12/01		
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name						Signature			Month Day Year		
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19											
Printed/Typed Name						Signature			Month Day Year		

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Caretaker DLA/Memphis TNEPA ID Number TN4210020570 Manifest Number 02064Waste Analysis Available. Yes ☒ No ☐ On file at facility ☐

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003* D004-D043 List all applicable constituents from Table 1
				Non-wastewater >1% TOC & > 1% TSS e	Wastewater f		
a	b	c	D			g	h
209401NS	✓						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Michael LeePrint Name Michael LeeDate 01/22/01

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No. 02085		2. Page 1 4		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number					
4. Generator's Phone (901) 544-0612						B. State Generator's ID					
5. Transporter 1 Company Name Action Resources						C. State Transporter's ID					
6. US EPA ID Number ALR000007237						D. Transporter's Phone 800-225-8611					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address Pollution Control Ints-TN 5485 Tay-For-Drive, Millington, TN, 38053						G. State Facility's ID					
10. US EPA ID Number TND000772188						H. Facility's Phone 901-354-4241					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
						No. Type				Waste No.	
a. <input checked="" type="checkbox"/> Waste Toxic Solids, Organic, n.o.s. (1,4 Dioxane, 1,4-Dithiane) 0.1, UN2811, PG II, ERG154						001 CM		00020		kg F 4	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee						Signature <i>Michael Lee</i>			Month Day Year 01/22/01		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name SCOTT UPTON						Signature <i>Scott Upton</i>			Month Day Year 01/22/01		
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name						Signature			Month Day Year		
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name						Signature			Month Day Year		

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1

Generator Name/Location Memphis Depot Caretaker DLA/ Memphis TNEPA ID Number TN4210020570 Manifest Number 02065Waste Analysis Available: Yes ☒ No ☐ On file at facility ☐

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003*, D004-D043
a	b	c	D	Non-wastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table 1 h
209401NS	✓						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true

Signature Michael Lee Print Name Michael LeeDate 01/22/01

BILL OF LADING

ACTION RESOURCES, INC.

1000 BUCKINGHAM DRIVE
 HALL COUNTY, GA 30751
 TEL (404) 252-2889 FAX (404) 382-2887

NO 07702

STATION NO. 1

SHIPPER <i>Wentworth Paper Co. Inc.</i>		LOADING OR UNLOADING <i>Wentworth Paper Co. Inc.</i>		WAYBILL NO.	
CONSIGNEE <i>Wentworth Paper Co. Inc.</i>		DESTINATION <i>Wentworth Paper Co. Inc.</i>			
TRACTOR NO.		TRAILER NO.		BOX NO.	
350		350		1990	
COMMODITY		UNIT		QUANTITY	
Unloading Manure		1		20Y	
9:00 TO 1:15 PM					
LOADING IN		OUT		DATE SHIPPED <i>12-21-01</i>	
TIME		TIME		LOADING NO.	
UNLOADING IN		OUT			
TIME		TIME			

GOVERNMENT STAND CLASSIFICATION ISSUED BY THE CARRIER AND ITS AGENTS

SUPPLIER *Wentworth Paper Co. Inc.*

CARRIER *Wentworth Paper Co. Inc.*

RECEIVING AND/OR DELIVERING CONTRACT NO.

TIME *12:00 PM*

DATE *12-21-01*

INITIALS *[Signature]*

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No. 02066		2. Page 1 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address 2163 Airways Blvd. Memphis Depot Caretaker DLA Memphis, TN, 38114						A. State Manifest Document Number					
4. Generator's Phone (901) 544-0612						B. State Generator's ID					
5. Transporter 1 Company Name Action Resources						C. State Transporter's ID					
6. US EPA ID Number ALR000007237						D. State Transporter's Phone 800-226-8845					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-Far-Drive, Millington, TN, 38053						G. State Facility's ID					
10. US EPA ID Number TND000772186						H. Facility's Phone 901-953-5201					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. <input checked="" type="checkbox"/> Waste-Toxic Solids, Organic, n.e.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154						No. 001		Type CM		Quantity 0.0020	
b.										Unit me	
c.										Vol 7	
d.											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee						Signature <i>Michael Lee</i>			Month Day Year 6/12/01		
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Leon Gorman			Signature <i>Leon Gorman</i>		
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name			Signature		
19. Discrepancy Indication Space						Month Day Year					
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					

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Caretaker DLA/Memphis, TNEPA ID Number TN4210020570 Manifest Number 02066Waste Analysis Available: Yes ☒ No ☐ On file at facility ☐

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001, D003, D004
				Non-wastewater >1% TOC & > 1% TSS	Wastewater	List all applicable constituents from key below	List all applicable constituents Table 1
a	b	c	D	e	f	g	h
209401 NS	✓						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- 5) Acetone
6) Benzene
7) N-Butyl Alcohol
8) Carbon Disulfide
9) Carbon Tetrachloride
10) Chlorobenzene
11) Cresols (o, m, or p isomers)

- 12) Cresylic Acid
13) Cyclohexanone
14) 1,2-Dichlorobenzene
15) Ethyl Acetate
16) Ethyl Benzene
17) Ethyl Ether
18) Isobutanol (isobutyl alcohol)

- 19) Methanol
20) Methylene Chloride
21) Methyl Ethyl Ketone
22) Methyl Isobutyl Ketone
23) Nitrobenzene
24) Pyridine
25) Tetrachloroethylene

- 26) Toluene
27) 1,1,1 Trichloroethane
28) 1,1,2 Trichloroethane
29) 1,1,2 Trichloro 1,2,2 Trifluoroeth
30) Trichloroethylene
31) Trichlorofluoromethane
32) Xylene (Total)

I certify under penalty of law that the above information is accurate and true.

Signature

Print Name

Michael Lee

Date

01/22/01

ACTION RESOURCES, INC.
 10000 W. 10th Ave. Suite 100
 Denver, CO 80231
 (303) 751-1000

SHIPPER: **0513**

CONSIGNEE: **0513**

COMB NO: **0513**

DATE: **05/13/05**

TIME: **11:05**

LOCATION: **0513**

MANIFEST: **0513**

DATE SHIPPED: **05/13/05**

LOADING: **0513**

SHIPPER	CONSIGNEE	COMB NO	DATE	TIME	LOCATION	MANIFEST	DATE SHIPPED	LOADING
0513	0513	0513	05/13/05	11:05	0513	0513	05/13/05	0513

LOADING IN: **0513**

LOADING OUT: **0513**

UNLOADING IN: **0513**

UNLOADING OUT: **0513**

AUTHORIZATION TO LOADING DEMURRAGE: **0513**

AUTHORIZATION TO UNLOADING DEMURRAGE: **0513**

654 583

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570	Manifest Document No. 02087	2 Page 1 d	Information in the shaded areas is not required by Federal law
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2183 Airways Blvd. Memphis, TN, 38114			A. State Manifest Document Number		
4. Generator's Phone (901) 544-0612			B. State Generator's ID		
5. Transporter 1 Company Name Action Resources			6. US EPA ID Number ALR 00 000 7237	C. State Transporter's ID	
7. Transporter 2 Company Name			8. US EPA ID Number	D. Transporter's Phone 800-851-8061	
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-Far-Drive, Millington, TN, 38053			10. US EPA ID Number TND000772188	E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility ID	
				H. Facility's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. <input checked="" type="checkbox"/> Waste Toxic Solids, Organic, n.e.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154			001 CM	0.0020	kg
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee			Signature Michael Lee		Month Day Year 10/12/01
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name SCOTT UPTON			Signature Scott Upton		Month Day Year 10/12/01
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19					
Printed/Typed Name			Signature		Month Day Year

PRINTED ON RECYCLED PAPER
USING SOYBEAN INK

ORIGINAL-RETURN TO GENERATOR

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1

Generator Name/Location Memphis Depot Coretaker DLA/Memphis, TN

EPA ID Number TN 4210020570 Manifest Number 02067

Waste Analysis Available: Yes ☒ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001, D002, D003, D004, D043
				Non-wastewater >1% TOC & >1% TSS	Wastewater		
a	b	c	D	e	f	g	h
209401 NS	<input checked="" type="checkbox"/>						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Michael Lee Print Name Michael Lee Date 01/23/01

654 586

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570	Manifest Document No. 02088	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2183 Airways Blvd. Memphis, TN, 38114				A. State Manifest Document Number	
4. Generator's Phone (901) 544-0612				B. State Generator's ID	
5. Transporter 1 Company Name Action Resources				C. State Transporter's ID	
6. US EPA ID Number ALR0000007237				D. Transporter's Phone 800-228-8885	
7. Transporter 2 Company Name				E. State Transporter's ID	
8. US EPA ID Number				F. Transporter's Phone	
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053				G. Facility's Phone	
10. US EPA ID Number TND000772186				H. Facility's Name	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers	13. Total Quantity
				No.	Type
a. X Waste-Toxic Solids, Organic, n.e.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154				001	CM
b.					00020
c.					
d.					
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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. GG0101042					
Printed/Typed Name Michael Lee		Signature Michael Lee		Month Day Year 10/12/01	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Scott Upton		Signature Scott Upton	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space		Month Day Year			
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			

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location Memphis Depot Caretaker DLA/Memphis, TN

EPA ID Number TN4210020570 Manifest Number 02068

Waste Analysis Available: Yes ☒ No ☐ On file at facility ☐

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003* D004-D043
				Non-Wastewater >1% TOC & > 1% TSS	Wastewater	List all applicable constituents from key below	List all applicable constituents from Table 1
a	b	c	D	e	f	g	h
209401 NS	✓						✓

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- 5) Acetone

6) Benzene

7) N-Butyl Alcohol

8) Carbon Disulfide

9) Carbon Tetrachloride

10) Chlorobenzene

11) Cresols (o, m, or p isomers)

12) Cresylic Acid

13) Cyclohexanone

14) 1,2-Dichlorobenzene

15) Ethyl Acetate

16) Ethyl Benzene

17) Ethyl Ether

18) Isobutanol (Isobutyl alcohol)
- 19) Methanol

20) Methylene Chloride

21) Methyl Ethyl Ketone

22) Methyl Isobutyl Ketone

23) Nitrobenzene

24) Pyridine

25) Tetrachloroethylene
- 26) Toluene

27) 1,1,1 Trichloroethane

28) 1,1,2 Trichloroethane

29) 1,1,2 Trichloro 1,2,2 Trifluoroethane

30) Trichloroethylene

31) Trichlorofluoromethane

32) Xylene (Total)

I certify under penalty of law that the above information is accurate and true.

Signature Michael Lee Print Name Michael Lee Date 1/23/01

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No. 02089		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number			
4. Generator's Phone (901) 544-0612						B. State Generator ID No.			
5. Transporter 1 Company Name Action Resources						C. State Transporter ID No.			
6. US EPA ID Number ALR000007237						D. Transporter Phone 800-228-8846			
7. Transporter 2 Company Name						E. State Transporter ID No.			
8. US EPA ID Number						F. Transporter Phone			
9. Designated Facility Name and Site Address Pollution Control Inc-TN 5485 Tay-For-Drive, Millington, TN, 38053						G. State Facility ID No.			
10. US EPA ID Number TND000772188						H. Facility Phone 901-353-5201			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. <input checked="" type="checkbox"/> Waste Toxic Solids, Organic, n.o.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154						No.	Type		
b.									
c.									
d.									
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee					Signature Michael Lee			Month Day Year 6/1/23/01	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name SCOTT UPTON					Signature Scott Upton			Month Day Year 6/1/23/01	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name					Signature			Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name					Signature			Month Day Year	

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Caretaker DLA/ Memphis, TNEPA ID Number TN4210020570 Manifest Number 02069Waste Analysis Available: Yes ☒ No ☐ On file at facility ☐

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003* D004-D043
				Non-wastewater >1% TOC & > 1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table I h
209401 NS	<input checked="" type="checkbox"/>	c	D				

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

5) Acetone	12) Cresylic Acid	19) Methanol	26) Toluene
6) Benzene	13) Cyclohexanone	20) Methylene Chloride	27) 1,1,1 Trichloroethane
7) N-Butyl Alcohol	14) 1,2-Dichlorobenzene	21) Methyl Ethyl Ketone	28) 1,1,2 Trichloroethane
8) Carbon Disulfide	15) Ethyl Acetate	22) Methyl Isobutyl Ketone	29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
9) Carbon Tetrachloride	16) Ethyl Benzene	23) Nitrobenzene	30) Trichloroethylene
10) Chlorobenzene	17) Ethyl Ether	24) Pyridine	31) Trichlorofluoromethane
11) Cresols (o, m, or p isomers)	18) Isobutanol (Isobutyl alcohol)	25) Tetrachloroethylene	32) Xylene (Total)

I certify under penalty of law that the above information is accurate and true.

Signature Michael LeePrint Name Michael LeeDate 8/23/01

654 590

ACTION RESOURCES, INC.

385 CO. RD 613, SUITE 100, WILMINGTON, DE 19807
 (302) 438-1100 FAX (302) 438-1101

8 5 1 2 3 4 5 6 7 8 9 0

SHIPPER ACTION RESOURCES, INC.		LOADING/STORAGE		MANIFEST NO. 8326	
CONSIGNEE PULTEC, INC.		DESTINATION NEW YORK			
DATE 10/1/83		BILL OF LADING NO. 330		DATE 10/1/83	
QUANTITY 1		UNIT 201		QUANTITY 201	
COMMODITY 1 Pallet of 201		QUANTITY 201		QUANTITY 201	
LOADING TIME IN 10:00 AM OUT 11:00 AM		UNLOADING TIME IN 10:00 AM OUT 11:00 AM		AUTHORIZATION UNLOADING DEMURAGE	
LOADING TIME IN 10:00 AM OUT 11:00 AM		UNLOADING TIME IN 10:00 AM OUT 11:00 AM		AUTHORIZATION UNLOADING DEMURAGE	

COVERED BY CARRIER'S AND CARRIER'S INSURANCE
 THE CARRIER AND CARRIER'S AGENT
 SHIPPER
 JAMES C. CASH
 1500
 1500 THE ABOVE CARRIER'S INSURANCE CO. CONDITION
 1500 THE ABOVE CARRIER'S INSURANCE CO. CONDITION
 1500 THE ABOVE CARRIER'S INSURANCE CO. CONDITION

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570	Manifest Document No. 02070	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA Memphis, TN, 38114		6. US EPA ID Number ALR000007237		A. State Manifest Document Number	
4. Generator's Phone (901) 544-0612		8. US EPA ID Number		B. State Generator's ID	
5. Transporter 1 Company Name Action Resources		10. US EPA ID Number TMD000772186		C. State Transporter's ID	
7. Transporter 2 Company Name				D. Transporter's Phone 800-851-8061	
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility ID	
				H. Facility's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <input checked="" type="checkbox"/> HM Waste Toxic Solids, Organic, n.e.s. (1,4 Dithiane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG164		No. Type 001 CM	00020	MX TY	
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael E Lee		Signature Michael E Lee		Month Day Year 01/12/30/01	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name SCOTT UPTON		Signature Scott Upton		Month Day Year 01/12/30/01	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name					
Signature		Month Day Year			

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Caretaker DLA / Memphis, TNEPA ID Number TN4210020570 Manifest Number 02070Waste Analysis Available: Yes ☒ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003*, D004-D043
				Non-wastewater >1% TOC & >1% TSS e	Wastewater f		
a	b	c	D			List all applicable constituents from key below g	List all applicable constituents from Table 1 h
209401NS	<input checked="" type="checkbox"/>						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Michael LeePrint Name Michael LeeDate 01/23/01

[illegible]

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No 02071		2. Page 1 1		Information in the shaded areas is not required by Federal law.	
		3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA Memphis, TN, 38114		4. Generator's Phone (901) 544-0612		5. Transporter 1 Company Name Action Resources		6. US EPA ID Number ALR000007237	
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053		10. US EPA ID Number TND000772188		11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	
GENERATOR		a.		b.		c.		d.	
		<div style="border: 1px solid black; padding: 2px;"> Waste Toxic Solids, Organic, n.e.s. (1,4 Dioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154 </div>		<div style="border: 1px solid black; padding: 2px;"> 001 </div>		<div style="border: 1px solid black; padding: 2px;"> CM </div>		<div style="border: 1px solid black; padding: 2px;"> 00020 </div>	
TRANSPORTER		15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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		17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name SCOTT UPTON		Signature <i>Scott Upton</i>	
		18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year			
		19. Discrepancy Indication Space							
		20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name		Signature		Month Day Year			
		FACILITY							

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1

Generator Name/Location Memphis Dept Caretaker DLA/Mem

EPA ID Number TN4210020570 Manifest Number 02071

Waste Analysis Available: Yes ☒ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003* D004-D043
				Non-wastewater >1% TOC & > 1% TSS	Wastewater	List all applicable constituents from key below	List all applicable constituents from Table 1
<u>209401 NS</u>	<u>✓</u>	<u>c</u>	<u>D</u>			<u>g</u>	<u>h</u>

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

5) Acetone	12) Cresylic Acid	19) Methanol	26) Toluene
6) Benzene	13) Cyclohexanone	20) Methylene Chloride	27) 1,1,1 Trichloroethane
7) N-Butyl Alcohol	14) 1,2-Dichlorobenzene	21) Methyl Ethyl Ketone	28) 1,1,2 Trichloroethane
8) Carbon Disulfide	15) Ethyl Acetate	22) Methyl Isobutyl Ketone	29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
9) Carbon Tetrachloride	16) Ethyl Benzene	23) Nitrobenzene	30) Trichloroethylene
10) Chlorobenzene	17) Ethyl Ether	24) Pyridine	31) Trichlorofluoromethane
11) Cresols (o, m, or p isomers)	18) Isobutanol (Isobutyl alcohol)	25) Tetrachloroethylene	32) Xylene (Total)

654 596

I certify under penalty of law that the above information is accurate and true.

Signature

Print Name

Date

Michael Lee Michael Lee 01/24/01

ACTION RESOURCES INC.

3150 Highway 13 • Birmingham, AL 35207
 PH: (205) 322-2288 FAX: (205) 322-2288

TELEPHONE

NO. 13007

855-855-8555

SHIPPER <i>McCall's Depot (Crestline)</i>		LOADING CITY/STATE <i>Mobile, AL</i>		MANIFEST NO.	
CONSIGNEE <i>Central Alabama</i>		DESTINATION <i>Mobile</i>			
TRAILER NO. <i>853</i>		TRAILER NO. <i>839</i>		LOADING <i>2401</i>	
DATE <i>1/10/01</i>		DATE <i>1/10/01</i>		DATE <i>1/10/01</i>	
TIME <i>11:00 AM</i>		TIME <i>1:00 PM</i>		TIME <i>2:00 PM</i>	
LOADING <i>IN</i>		LOADING <i>OUT</i>		LOADING <i>IN</i>	
TIME <i>11:00 AM</i>		TIME <i>1:00 PM</i>		TIME <i>2:00 PM</i>	
UNLOADING <i>IN</i>		UNLOADING <i>OUT</i>		UNLOADING <i>IN</i>	
TIME <i>11:00 AM</i>		TIME <i>1:00 PM</i>		TIME <i>2:00 PM</i>	

AUTHORIZATION-LOADING DEMURRAGE
[Signature]

AUTHORIZATION-UNLOADING DEMURRAGE
[Signature]

OPTIONAL AND/OR ADDITIONAL INFORMATION ISSUED BY
[Signature]

RECEIVED BY AND/OR RECEIVED FOR
[Signature]

654 598

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No 02072		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2163 Airways Blvd. Memphis, TN, 38114				A. State Manifest Document Number		B. State Generator's ID		C. State Transporter's ID	
4. Generator's Phone (901) 544-0612				6. US EPA ID Number AIK000007237		D. Transporter's Phone (615) 228-2200		E. State Transporter's ID	
5. Transporter 1 Company Name ACTIC Resources				8. US EPA ID Number		F. Transporter's Phone		G. State Facility's ID	
7. Transporter 2 Company Name				10. US EPA ID Number TND000772188		H. Facility's Phone		I. Waste No.	
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053									
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. <input checked="" type="checkbox"/> Waste-Toxic Solids, Organic, n.o.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154				No. Type 001 CM		0.0020		g	
b.									
c.									
d.									
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 Or Frank Johnson 703-625-3792 GG0101042									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 Michael Lee				Signature Michael Lee				Month Day Year 12/12/01	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name Leon Gannon				Signature Leon Gannon				Month Day Year 12/12/01	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name				Signature				Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name				Signature				Month Day Year	

**ORIGINAL-RETURN TO GENERATOR**

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1

Generator Name/Location Memphis Depot Caretaker DLA / Memphis, TN

EPA ID Number TN4210020570 Manifest Number 03072

Waste Analysis Available: " Yes ☒ No ☐ On file at facility

[illegible]

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethyflene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p Isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethyflene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Michael Lee Print Name Michael Lee Date 01/24/01

ACTION RESOURCES INC.
 1350 Highway 135, Hamdenville, AL 35077
 PH (205) 312-2411 FAX (205) 352-2457

NO. 077084

8.55 LBS
 8.55 LBS

SHIPPER <i>McAulis / 14, 27, 28, 29</i>		LOADING CITY/STATE <i>Mobile, AL</i>		MANIFEST NO.	
CONSIGNEE		DESTINATION <i>Mobile, AL</i>			
FACTORY NO.		TRAILER NO.		DATE SHIPPED <i>12-27-81</i>	
8550		3410		OAG NO.	
COMPAZ (14, 27, 28, 29)		COMPAZ (14, 27, 28, 29)		QUANTITY	
1 14, 27, 28, 29		1 14, 27, 28, 29		Cans	
				Yards	
				Hrs	
				Tons	
LOADING IN		UNLOADING IN		ROCKWORTH, ALABAMA AND CLASSIFICATION ISSUED BY	
TIME		TIME		THE STATE OF ALABAMA	
AUTHORIZATION (SIGNATURE)		AUTHORIZATION (SIGNATURE)		DATE	
UNLOADING IN		UNLOADING IN		FOR 1011 - IN GOOD CONDITION	
TIME		TIME		SIGNATURE	
AUTHORIZATION (SIGNATURE)		AUTHORIZATION (SIGNATURE)		DATE	

654 601

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No. 02073		2. Page 1 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA 2183 Airways Blvd. Memphis, TN, 38114						A. State Manifest Document Number					
4. Generator's Phone (901) 544-0612						B. State Generator's ID					
5. Transporter 1 Company Name Action Resources Inc						C. State Transporter's ID					
6. US EPA ID Number ALR100009239						D. Transporter's State ID					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's State ID					
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053						G. State Facility's ID					
10. US EPA ID Number TND000772188						H. Facility's State ID					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
						No. Type					
a. <input checked="" type="checkbox"/> Waste Toxic Solids, Organic, n.o.s. (1,4 Dioxane, 1,4-Dithiane) 8.1, UN2611, PG II, ERG154						001 CM		00020		Y	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee						Signature <i>Michael Lee</i>			Month Day Year 10/24/01		
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>Leon Garmon</i>			Month Day Year 10/24/01		
Printed/Typed Name Leon Garmon						Signature			Month Day Year		
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature			Month Day Year		
Printed/Typed Name											
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		

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Caretaker DLA/Memphis, TNEPA ID Number TN Manifest Number 02073Waste Analysis Available: Yes ☒ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003*, D004-D043
a	b	c	D	Non-wastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table 1 h
209401NS	<input checked="" type="checkbox"/>						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

5) Acetone	12) Cresylic Acid	19) Methanol	26) Toluene
6) Benzene	13) Cyclohexanone	20) Methylene Chloride	27) 1,1,1 Trichloroethane
7) N-Butyl Alcohol	14) 1,2-Dichlorobenzene	21) Methyl Ethyl Ketone	28) 1,1,2 Trichloroethane
8) Carbon Disulfide	15) Ethyl Acetate	22) Methyl Isobutyl Ketone	29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
9) Carbon Tetrachloride	16) Ethyl Benzene	23) Nitrobenzene	30) Trichloroethylene
10) Chlorobenzene	17) Ethyl Ether	24) Pyridine	31) Trichlorofluoromethane
11) Cresols (o, m, or p isomers)	18) Isobutanol (Isobutyl alcohol)	25) Tetrachloroethylene	32) Xylene (Total)

I certify under penalty of law that the above information is accurate and true.

Signature Michael Lee Print Name Michael LeeDate 01/24/01

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TN4210020570		Manifest Document No. 02074		2. Page 1 d		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA Memphis, TN, 38114						A. State/Market Document Number					
4. Generator's Phone (901) 544-0612						B. State Generator ID					
5. Transporter 1 Company Name Action Resources						C. State Transporter ID					
6. US EPA ID Number LA LR 000002237						D. Transporter Phone 800-221-880					
7. Transporter 2 Company Name						E. State Transporter ID					
8. US EPA ID Number						F. State Generator ID					
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053						G. State Facility ID					
10. US EPA ID Number TND000772188						H. State Facility ID					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
						No. Type					
a. <input checked="" type="checkbox"/> Waste Toxic Solids, Organic, n.o.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154						001 CM		00020		Y	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792 GG0101042											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee						Signature Michael Lee			Month Day Year 10/12/90		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name SCOTT UPTON						Signature Scott Upton			Month Day Year 10/12/90		
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name						Signature			Month Day Year		
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name						Signature			Month Day Year		



LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot CaretakerEPA ID Number TN4210020570 Manifest Number 02074Waste Analysis Available: Yes ☒ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001, D002, D003, D004-D043
				Non-wastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table 1 h
209401 NS	<input checked="" type="checkbox"/>	c	D				

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

5) Acetone	12) Cresylic Acid	19) Methanol	26) Toluene
6) Benzene	13) Cyclohexanone	20) Methylene Chloride	27) 1,1,1 Trichloroethane
7) N-Butyl Alcohol	14) 1,2-Dichlorobenzene	21) Methyl Ethyl Ketone	28) 1,1,2 Trichloroethane
8) Carbon Disulfide	15) Ethyl Acetate	22) Methyl Isobutyl Ketone	29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
9) Carbon Tetrachloride	16) Ethyl Benzene	23) Nitrobenzene	30) Trichloroethylene
10) Chlorobenzene	17) Ethyl Ether	24) Pyridine	31) Trichlorofluoromethane
11) Cresols (o, m, or p isomers)	18) Isobutanol (isobutyl alcohol)	25) Tetrachloroethylene	32) Xylene (Total)

I certify under penalty of law that the above information is accurate and true.

Signature Michael LeePrint Name Michael LeeDate 01/24/01

[illegible][illegible]

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No TN4210020570		Manifest Document No. 02099		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Memphis Depot Caretaker DLA Memphis, TN, 38114						A. State Manifest Document Number					
4. Generator's Phone (901) 544-0612						B. State Generator's ID					
5. Transporter 1 Company Name ACTION RESOURCES INC						C. State Transporter's ID					
6. US EPA ID Number AL6000007237						D. Transporter's Phone 800-205-8855					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address Pollution Control Inds-TN 5485 Tay-For-Drive, Millington, TN, 38053						G. State Facility's ID					
10. US EPA ID Number TND000772188						H. Facility's Phone 901-551-5291					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. Toxic Solids, Organic, n.o.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154						No. 001		Type CM		Waste No. 1	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information 24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792						GG0101042					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Michael Lee						Signature Michael Lee			Month Day Year 11/25/01		
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Leon Garman			Signature Leon Garman		
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name			Signature		
19. Discrepancy Indication Space						Month Day Year					
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		

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Caretaker DLA / Memphis, TNEPA ID Number TN4210020570 Manifest Number 02099Waste Analysis Available: Yes ☒ No ☐ On file at facility ☐

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001, D002, D003, D004-D043
a	b	c	D	Non-wastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table 1 h
209401NS	✓						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

5) Acetone	12) Cresylic Acid	19) Methanol	26) Toluene
6) Benzene	13) Cyclohexanone	20) Methylene Chloride	27) 1,1,1 Trichloroethane
7) N-Butyl Alcohol	14) 1,2-Dichlorobenzene	21) Methyl Ethyl Ketone	28) 1,1,2 Trichloroethane
8) Carbon Disulfide	15) Ethyl Acetate	22) Methyl Isobutyl Ketone	29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
9) Carbon Tetrachloride	16) Ethyl Benzene	23) Nitrobenzene	30) Trichloroethylene
10) Chlorobenzene	17) Ethyl Ether	24) Pyridine	31) Trichlorofluoromethane
11) Cresols (o, m, or p isomers)	18) Isobutanol (isobutyl alcohol)	25) Tetrachloroethylene	32) Xylene (Total)

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I certify under penalty of law that the above information is accurate and true.

Signature Michael Lee Print Name Michael Lee Date 01/25/01

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

TN4210020570

Manifest Document No. 02075

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
2183 Airways Blvd.
Memphis Depot Caretaker
DLA Memphis, TN, 38114

4. Generator's Phone (901) 544-0612

5. Transporter 1 Company Name
ACTION RESOURCES INC.

6. US EPA ID Number

ALR000007237

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

Pollution Control Inds-TN
5485 Tay-For-Drive, Millington, TN,
38053

10. US EPA ID Number

TND000772186

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

15. Waste No.

a. ☒ **Waste Toxic Solids, Organic, n.o.s. (1,4 Thioxane, 1,4-Dithiane) 6.1, UN2811, PG II, ERG154**

No. Type

2001 CM

00020

kg

2

b.

c.

d.

15. Special Handling Instructions and Additional Information

24 Hour Emergency Contact: Mike Lee 901-754-4999 or DLA 800-851-8061 or Frank Johnson 703-625-3792

GG0101042

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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

Michael Lee

Signature

Michael Lee

Month Day Year

6/12/50/1

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

SCOTT UPTON

Signature

Scott Upton

Month Day Year

6/12/50/1

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

654 611

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 1Generator Name/Location Memphis Depot Coretaker DLA/ Memphis, TNEPA ID Number TN 4210020570 Manifest Number 02075Waste Analysis Available: Yes ☒ No ☐ On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003*, D004-D043
				Non-Wastewater >1% TOC & > 1% TSS e	Wastewater f		
a	b	c	D			List all applicable constituents from key below g	List all applicable constituents from Table 1 h
20940INS	✓						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature Michael Lee Print Name Michael Lee Date 01/25/01

ACTION RESOURCES INC.
 10000 1st Street
 Dallas, Texas 75243
 (214) 342-2333

SHIPPER
 ACTION RESOURCES INC.

CONSIGNEE
 Central Cold Storage

LOADING INSTRUCTIONS
 DESTINATION: LAKE CHARLES, LA

TRAILER NO. 3293 **BOXES** 250

MANIFEST NO. 10075

LOADING NO. 10075

CONSIGNEE	LOADING INSTRUCTIONS	DESTINATION	TRAILER NO.	BOXES	QUANTITY
Central Cold Storage	LAKE CHARLES, LA	3293	250	250	0.45
					1.00
					1.00
					1.00

LOADING IN 4:30 M. OUT 5:30 M.

UNLOADING IN 5:30 M. OUT 6:30 M.

AUTHORIZATION - LOADING DEMURRAGE
10075

AUTHORIZATION - UNLOADING DEMURRAGE
10075

REMARKS
 10075

REMARKS
 10075

FINAL PAGE

PART I

ADMINISTRATIVE RECORD

PART I

FINAL PAGE