

SUMMARY OF ENVIRONMENTAL DUE DILIGENCE FOR LITTLE CANOE CREEK INDUSTRIAL PARK

Various levels of environmental analysis were conducted in 4 different sections. Below is a description for each section.

1. Little Canoe Creek Industrial Park (approximately 670 acres) – Main site. GMC conducted a full Waters of the U.S. Delineation (wetlands and streams), an Endangered and Threatened Species survey with USFWS concurrence, and a Cultural Resources survey with SHPO concurrence. Phase I ESA for this property was done by others (652 acres). See page 7.

2. Little Canoe Creek Additional 320 Acres (320 acres) – North of main site. Etowah County only purchased approximately 240 acres of the 320 acre site; therefore 80 acres were studied that are not within the current park site boundary. GMC conducted a Phase I ESA, a full Waters of the U.S. Delineation (wetlands and streams), an Endangered and Threatened Species survey with USFWS concurrence, and a Cultural Resources survey. See page 223.

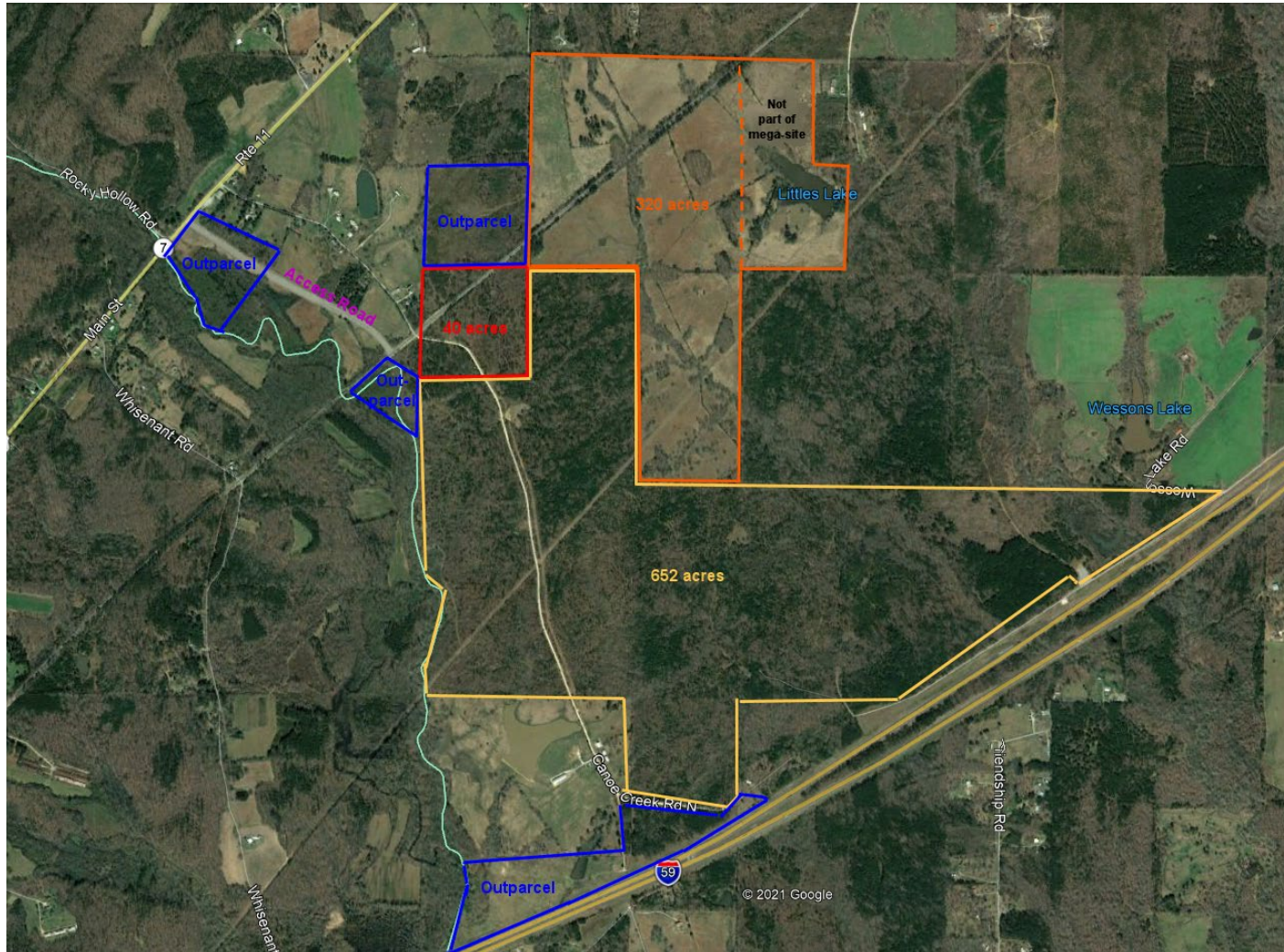
3. Little Canoe Creek Industrial Access Road – Access road built from Highway 11 into the park boundary. GMC conducted a full Waters of the U.S. Delineation (wetlands and streams), an Endangered and Threatened Species survey with USFWS concurrence, and a Cultural Resources survey with concurrence. In addition, GMC assisted in the acquisition of a wetland permit for the road construction. A Phase I ESA was not conducted by GMC on the access road.

4. Little Canoe Creek 40 Acres Tract (40 acres) – Located on the northwest corner of the main. GMC conducted a Phase I ESA, a full Waters of the U.S. Delineation (wetlands and streams), an Endangered and Threatened Species survey with USFWS concurrence, and a Cultural Resources survey with SHPO concurrence. See page 295.

5. Little Canoe Creek Outparcels – Located on the south end and the northwest corner of the main site. GMC conducted a Phase I ESA, a full Waters of the U.S. Delineation (wetlands and streams), an Endangered and Threatened Species survey with USFWS concurrence, and a Cultural Resources survey with SHPO concurrence. See page 403.

Little Canoe Creek @dvantageSite MEGA-SITE

Phase 1 Environmental Studies Identification of Parcels





December 13, 2018

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**RE: Little Canoe Creek Industrial Park
Camp Sibert Information
Etowah County, Alabama**

To Whom it May Concern,

Please let this serve as additional information in reference to the referenced property being located within the limits of the former Camp Sibert operation. Camp Sibert occupied approximately 37,035 acres in Etowah and St. Clair Counties in the Canoe Creek Valley of northeastern Alabama. A majority of the subject site is found within the former Camp Sibert property boundary. Camp Sibert was a former Army base that operated from 1942 to 1945 to train units and individuals in basic military training. **The subject property is located within an area that is not a suspect location for the disposal of hazardous materials within the former camp boundary.**

It is our understanding that the U.S. Army Corps of Engineers (USACE) is responsible for any further assessments or remediation activities that may be warranted in the future. Information regarding the Camp Sibert site is provided in the Phase I ESA entitled "Phase I ESA, Little Canoe Creek Industrial Park (Proposed 320 Acre Addition)". Although this area of the camp is not known to contain hazardous materials, GMC recommended that the USACE be contacted in the event of the discovery of potentially hazardous materials during site development. In addition, GMC recommends that grading and site work contractors be notified of the established procedures to follow in the event that any potential mortars are discovered during dirt moving operations.

If you have any questions, please do not hesitate to call me at 205-879-4462.

Sincerely,

Stuart Blackwell, PWS
Environmental Department Manager
Birmingham Office

AS198 Phase 1 Environmental Study 2008-05-14



**DRAFT FINAL REVISION 1
DECISION DOCUMENT**

for

**CAMP SIBERT CONVENTIONAL AREAS
MUNITIONS RESPONSE SITE
FORMER CAMP SIBERT
ETOWAH and ST. CLAIR COUNTIES, ALABAMA**

MRA ID: I04AL005702R01

FUDS Project No. I04AL005703

U.S. Army Engineering and Support Center, Huntsville

and

U.S. Army Corps of Engineers, Mobile District

August 17, 2016

EXECUTIVE SUMMARY

1.0 This Decision Document is being presented by the United States Army Corps of Engineers (USACE) to describe the Department of Defense (DoD) selected remedy for the Camp Sibert Conventional Areas Munitions Response Site (MRS), MRA ID: I04AL005702R01, Formerly Used Defense Site (FUDS) Project Number I04AL005703, located within the former Camp Sibert in Etowah and St. Clair Counties, Alabama.

2.0 In accordance with the DoD Instruction 4715.7, Environmental Restoration Program, dated April 22, 1996, the Secretary of Defense designated the Army as the Executive Agent on behalf of the DoD charged with meeting all applicable environmental restoration requirements at FUDS. The FUDS Charter assigned the responsibilities for management and execution of the FUDS program to the USACE. The USACE is responsible for investigating, reporting, evaluating remedial actions, and implementing remedial actions at the former Camp Sibert.

3.0 On the basis of the data collected during previous investigations and the Remedial Investigation (RI) conducted at the Conventional Areas MRS, there is no significant Munitions and Explosives of Concern (MEC) or munitions constituents (MC) hazard. Therefore, since a source is not present, exposure pathways are considered incomplete.* Unacceptable risks associated with MC contamination are not expected at the Camp Sibert Conventional Areas MRS. No Action is required for the site because an explosive safety hazard or MC risk to human health and the environment is not anticipated.

4.0 The remedy for the Camp Sibert Conventional Areas MRS was selected in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S. Code § 9601 *et seq.*, as amended by the Superfund Amendments and Reauthorization Act of 1986, and the National Oil and Hazardous Substances Pollution Contingency Plan, 40 Code of Federal Regulations Part 300 *et seq.*, as amended.

5.0 Representatives of the Alabama Department of Environmental Management (ADEM) have reviewed the RI Report and Proposed Plan and support the No Action decision for the Camp Sibert Conventional Areas MRS.

6.0

Based on information currently available, no action is protective of human health and the environment and satisfies the statutory requirements of CERCLA §121(b) and is consistent with the anticipated future use of the site. The estimated cost is \$0.00.

** Explanation below added by Etowah County:*

"If an exposure pathway is incomplete, then at least one part of the exposure pathway is missing and no one is exposed to the chemical by that route of exposure."

*Source: Agency for Toxic Substances and Disease Registry
https://www.atsdr.cdc.gov/tox-tool/exposure/ep_1c.html*

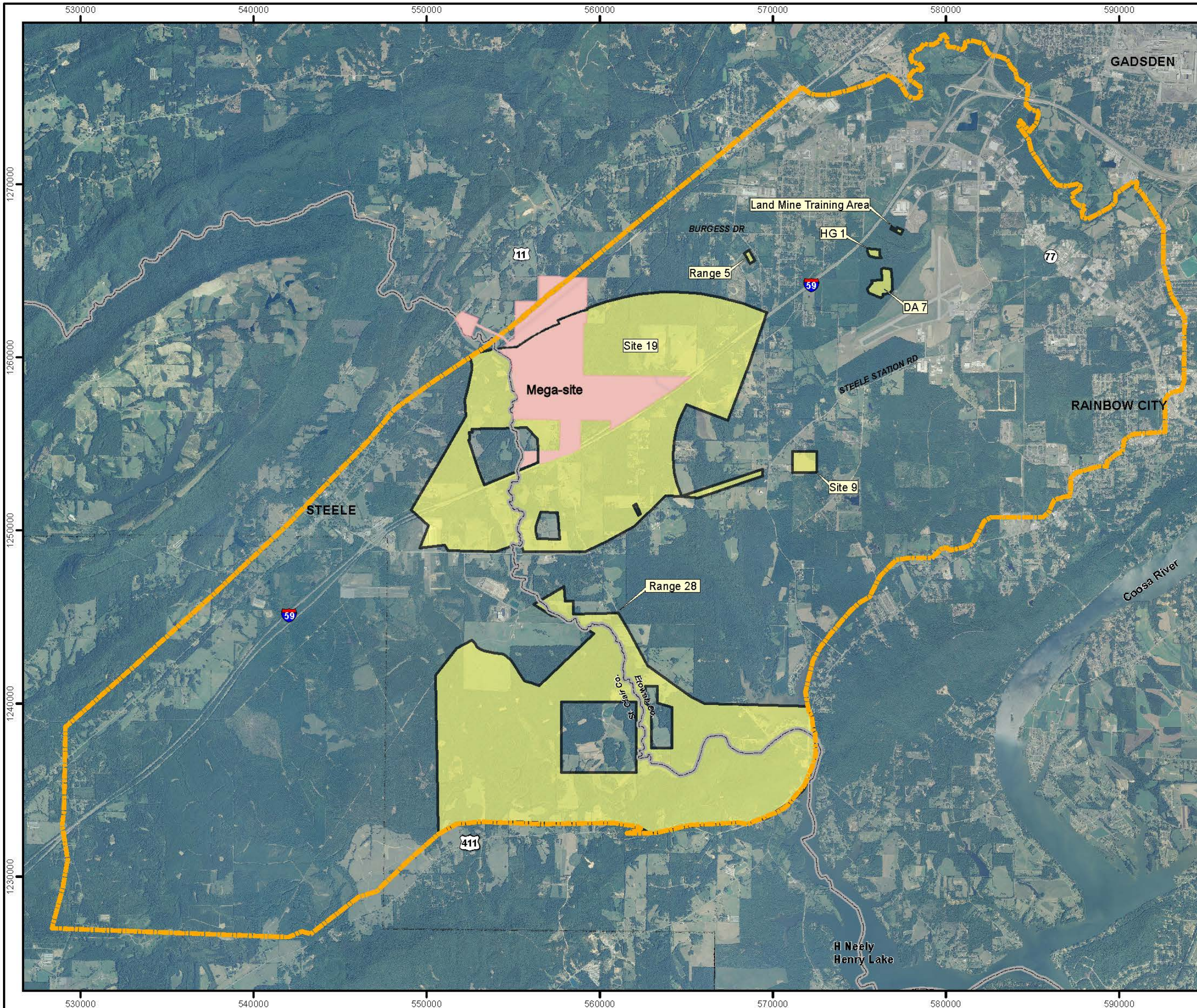


Figure 1

**Conventional Areas MRS
Former Camp Sibert**

Legend

- Conventional Areas MRS
- Former Camp Sibert Boundary
- County Boundary

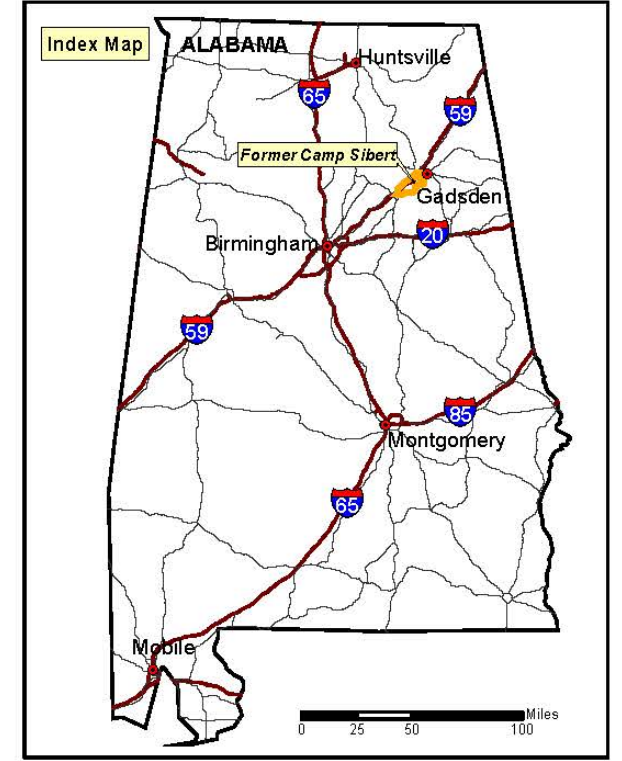


Image: Orthophoto, 2011
 Map Units: Alabama State Plane East, NAD 83, Feet

1 0.5 0 1 Miles

PARSONS

U.S. ARMY ENGINEERING AND SUPPORT CENTER HUNTSVILLE

DESIGNED BY: BT	Former Camp Sibert	
DRAWN BY: BT		
CHECKED BY: IG	SCALE: As Shown	PROJECT NUMBER: 746364.07004
SUBMITTED BY: JC	DATE: August 2016	PAGE NUMBER: 4



**PHASE I
ENVIRONMENTAL
SITE ASSESSMENT**

Proposed Little Canoe Creek Industrial Park
Canoe Creek Road North
Gadsden, Etowah County, Alabama
S&ME Project No. 1464-08-003

Prepared For:

Etowah County Commission
800 Forrest Avenue
Gadsden, AL 35901

Prepared By:

S&ME, INC.
2713 Kanasita Drive.
Hixson, Alabama

May 14, 2008

TABLE OF CONTENTS

	<u>Page</u>
1.0 SUMMARY	1
2.0 INTRODUCTION	3
2.1 PURPOSE.....	3
2.2 SCOPE OF SERVICES.....	3
2.3 SIGNIFICANT ASSUMPTIONS.....	5
2.4 LIMITATIONS OF THE ASSESSMENT.....	5
2.5 SPECIAL TERMS AND CONDITIONS	5
2.6 USER RELIANCE.....	6
3.0 SITE DESCRIPTION	7
3.1 LOCATION AND LEGAL DESCRIPTION	7
3.2 SITE AND VICINITY DESCRIPTION	7
3.3 CURRENT USES OF THE SUBJECT PROPERTY.....	8
3.4 PAST USE(S) OF THE SUBJECT PROPERTY	8
3.5 STRUCTURES, ROADS AND OTHER IMPROVEMENTS ON-SITE	8
3.6 CURRENT USE(S) OF ADJOINING AND SURROUNDING PROPERTIES	9
3.7 PAST USE(S) OF THE ADJOINING AND SURROUNDING PROPERTIES	9
4.0 USER PROVIDED INFORMATION.....	10
4.1 TITLE RECORDS	10
4.2 ENVIRONMENTAL LIENS	10
4.3 SPECIALIZED KNOWLEDGE.....	10
4.4 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES	10
4.5 OWNER, OCCUPANT AND PROPERTY MANAGER INFORMATION.....	10
4.6 REASON FOR PERFORMING THE PHASE I ESA.....	10
4.7 OTHER.....	10
5.0 RECORDS REVIEW.....	11
5.1 STANDARD ENVIRONMENTAL RECORD SOURCES.....	11
5.2 ADDITIONAL ENVIRONMENTAL RECORD SOURCES	12
5.3 PHYSICAL SETTING SOURCES.....	13
5.4 HISTORIC USE INFORMATION ON THE PROPERTY.....	13
5.4.1 Historic Aerial Photographs.....	13
5.4.2 Sanborn Maps	14
5.4.3 City Directories	14
5.4.4 Tribal Records	14
5.4.5 Historic Topographic Maps.....	14
5.5 HISTORIC USE INFORMATION ON ADJOINING PROPERTIES	14
6.0 INFORMATION FROM THE SITE RECONNAISSANCE	16
6.1 METHODOLOGY AND LIMITING CONDITIONS	16
6.2 GENERAL SITE SETTING	16

- Appendix B: EDR Radius Map Report
- Appendix C: Historical Information
 - Aerial Photographs
 - City Directories
 - Topographic Maps
 - Sanborn Maps
 - Parsons 2005 Report
 - Parsons 2006 Report
 - ATSDR 2007 Report
- Appendix D: User Provided Information
- Appendix E: S&ME, Inc. Proposal
- Appendix F: Resumes of Environmental Professionals

6.2.1	Current Use(s) of the Property.....	16
6.2.2	Current Use(s) of the Adjoining and Surrounding Properties	16
6.2.3	Geologic, Hydrogeologic, Hydrologic and Topographic Conditions.....	16
6.2.4	General Description of Roads and Structures	17
6.2.5	Potable Water and Sewage Disposal System	17
6.3	ON-SITE EXTERIOR OBSERVATIONS.....	17
6.4	ON-SITE INTERIOR OBSERVATIONS.....	17
7.0	INTERVIEWS.....	18
7.1	INTERVIEWS WITH CURRENT AND PAST OWNERS.....	18
7.2	INTERVIEW WITH SITE MANAGER.....	18
7.3	INTERVIEWS WITH CURRENT AND PAST OCCUPANTS	18
7.4	INTERVIEWS WITH LOCAL GOVERNMENT OFFICIALS	18
7.5	INTERVIEWS WITH OTHERS	18
8.0	FINDINGS.....	19
8.1	ON-SITE FINDINGS	19
8.2	OFF-SITE FINDINGS.....	19
9.0	OPINIONS	20
9.1	ON-SITE OPINIONS.....	20
9.2	OFF-SITE OPINIONS	20
9.3	DATA GAPS.....	20
10.0	CONCLUSIONS	21
11.0	DEVIATIONS	22
12.0	ADDITIONAL SERVICES	23
13.0	REFERENCES.....	24
14.0	SIGNATURES AND ENVIRONMENTAL PROFESSIONAL STATEMENT	25
15.0	QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS	26

Appendices

Appendix A: Figures

- Figure 1: Site Vicinity Map
- Figure 2: Site Tax Map
- Figure 3: USGS Topographic Map
- Figure 4: 2006 Aerial Photograph
- Figure 5: Camp Sibert Promotional Piece
- Figure 6: 2007 Geophysical Survey Map
- Figure 7: Site Photographs

1.0 SUMMARY

S&ME, Inc. (S&ME) has performed a Phase I Environmental Site Assessment (ESA) for the approximately 652± acre property located in Gadsden, Alabama. This Phase I ESA was authorized by Willie F. Brown, President of the Etowah County Commission. The following summary is intended as an overview of the Phase I ESA for the convenience of the reader. The report should be read in its entirety, including appendices.

The subject property is located between a railroad line and private lands to the north, Interstate 59 to the east and south, and portions of Canoe Creek Road North and Little Canoe Creek to the west, as shown on Figure 1. A tax map obtained from the Etowah County Revenue Commission indicates that the subject property is comprised of four parcels with an aggregate area of approximately 652 acres. The parcels, from west to east, contain areas of 277± acres, 164± acres, 171± acres, and 40± acres, respectively, as shown on Figure 2.

Little Canoe Creek flows from north to south along portions of the western boundary. Surface streams on the 40-acre tract and on most of the 277-acre tract flow southwest into Little Canoe Creek. Surface drainage on the eastern portion of the subject property is into one of three unnamed blue line streams. Field observations identified several more small, flowing streams on the subject property than shown on the United States Geological Survey (USGS) topographic map. The highest elevation on the subject property is located on the northwestern portion and is approximately 600 feet above mean sea level. The lowest elevations are located along the southeastern and southwestern boundaries at approximately 540 feet above mean sea level.

Review of environmental databases, which are listed in the EDR Radius Map Report included in Appendix B, identified no sites within the applicable ASTM search distances.

A review of historical aerial photographs, city directories, and historical topographic maps indicate the subject property has not contained permanent structures since at least 1972. One three-sided wood shed is located on the eastern portion of the subject property. The shed appeared to be used by a hunting club, which used the property. Uses of the surrounding properties appear to be for residences or small scale agriculture purposes.

The subject property was part of the former U.S. Army base known as Camp Sibert. Camp Sibert comprised more than 37,000 acres in Etowah and St. Clair Counties. The Army used Camp Sibert for training exercises in chemical warfare with agents such as mustard gas. The subject property may have been part of the firing range, though no unexploded ordnance (UXO) has been positively identified on the subject property by the US Army Corps of Engineers (Corps). Parsons Engineering (Parsons) has been retained by the Department of Defense to assess the lands of the former base. Parsons has produced several reports regarding environmental assessments. Two of these reports were available for review at the Gadsden Library. Each of these two reports, dated June 2005 and May 2006, discussed locations where UXO was found. The subject property was not specifically addressed in these reports.

2.0 INTRODUCTION

2.1 Purpose

The purpose of this Phase I Environmental Site Assessment (ESA) was to identify, to the extent feasible pursuant to the processes described herein, *recognized environmental conditions* (RECs) in connection with the subject property. This Phase I ESA was prepared in accordance with the American Society for Testing and Materials (ASTM) E 1527-05, *Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process*. A revised standard practice was published in November 2005 to satisfy new requirements for *All Appropriate Inquiries (AAI)* as per 40 CFR Part 312 to permit the User to qualify for certain *Landowner Liability Protections (LLPs)*. The *AAI* rule is effective November 1, 2006 such that commercial real estate transactions closing after this date should be performed in accordance with the *AAI* rule (or ASTM E1527-05) to qualify for *LLPs*.

ASTM defines the term *recognized environmental condition* as the presence or likely presence of hazardous substances or petroleum products on the property under conditions that indicate an existing release, a past release, or a material threat of a release of hazardous substances or petroleum products into the structures on the property or into the ground, groundwater, or surface water of the property. The term does not include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies.

The scope of this project included four primary tasks: 1) a review of the public record; 2) a site reconnaissance; 3) interviews; and 4) preparation of a report. Each of these four tasks is discussed in more detail in Section 2.2.

Unless specifically authorized as an addition to the Phase I ESA work scope, the assessment did not include any assessment of environmental conditions not specifically included in the ASTM E 1527-05 standard such as the assessment of business risk issues such as wetlands; asbestos-containing materials; lead-based paint; lead in drinking water; mold, fungi or bacteria in on-site buildings; regulatory compliance; cultural/historic risks; industrial hygiene; health/safety; ecological resources; endangered species; indoor air quality (including vapor intrusion); radon or high voltage power lines. S&ME, Inc. can provide any of these additional services, if specifically requested.

2.2 Scope of Services

S&ME's approach to performing this Environmental Site Assessment consisted of four major tasks in accordance with the ASTM Standard Practice E1527-05.

Task 1 - A review of reasonably ascertainable and practically reviewable public records for the site and the immediate vicinity was conducted to characterize environmental features of the site and to identify past and present land use activities, on or in the vicinity of the site,

which may indicate a potential for *recognized environmental conditions*. The review of the public record included:

1. Examination of public records made available to S&ME by regulatory personnel regarding past, present, and pending enforcement actions and investigations at the site and within the immediate vicinity.
2. Examination of one or more of the following resources: aerial photographs, fire insurance maps, street directories and topographic maps of the site and vicinity for evidence suggesting past uses that might have involved hazardous substances or petroleum products.
3. Examination of the property chain-of-title back to 1940 (or earlier, if developed prior to 1940), and a copy of the current deed, if each is prepared by the client's attorney, to consider whether there is any evidence that past owners may have used or stored hazardous substances or petroleum products on the subject property, or whether the property deed contains any mention of an environmental lien.

Task 2 - A site reconnaissance was performed to identify visual signs of environmental conditions on or adjacent to the site, and to evaluate evidence found in the review of public record that might be indicative of activities resulting in hazardous substances or petroleum products being used or deposited on the site. The site reconnaissance included the following activities:

1. A visual reconnaissance of the site and adjacent properties was performed to observe signs of spills, stressed vegetation, buried waste, underground or above ground storage tanks, subsidence, transformers, or unusual soil discoloration which may indicate the possible presence of contaminants on the properties.
2. The periphery of the property was viewed and a walk-through of accessible areas of the site interior, including any on-site structures, was conducted.
3. Areas of the site were photographed to document the current use(s) of the property as well as significant conditions such as unusually discolored soil, stressed vegetation, or other significant features associated with the property.

Task 3 – Interviews were made with: 1) various government agencies, 2) current owner, or 3) adjoining property owners. Their comments are included the interview sections of this report.

Task 4 - The collected data were evaluated and this report was prepared.

2.3 Significant Assumptions

A significant assumption used in evaluating potential impacts to the subject property of nearby, off-site incidents was that the slope of the water table under static conditions (no pumping interference) often approximates the land surface topography. Thus, the movement of groundwater is assumed to be in approximately the same direction as the dip of the topographic slope.

2.4 Limitations of the Assessment

The findings of this report are applicable and representative of conditions encountered at the subject property at the time of this evaluation, and may not represent conditions at a later date. The review of public records was limited to that information which was available to S&ME at the time this report was prepared. Interviews with local and state government authorities were limited to those people whom S&ME was able to contact during the preparation of this report. All information was derived from practically reviewable, readily available sources in compliance with the standards set forth by the American Society for Testing and Materials (ASTM) Standard Practice E1527-05 Phase I Environmental Site Assessment and Reports Requirements (Revised February 3, 2006 – 4 pages) and Supplement (Revised May 22, 2000 - 6 pages). Although this report satisfies the ASTM E1527-05 Standard Practice, these results are not a guarantee or warranty that no environmental conditions exist or that the property is free from all contamination. The ASTM Standard was developed to outline *appropriate inquiry* into the assessment of real property and therein “reduce, but not eliminate, uncertainty regarding the potential for *recognized environmental conditions*.”

Review of historical sources was limited due to the scales and clarity of the reviewed aerial photographs which prohibits the identification of smaller areas of potential open dumping, drum storage, or hazardous material storage.

The opinions presented in this report are based on findings derived from a site reconnaissance, a review of specified regulatory records and historical sources, and comments made by interviewees. Generally, information obtained from public records and from interviews is reliable. However, S&ME cannot warrant or guarantee that information provided is complete or accurate. In the event responses requested by S&ME from public agencies are provided to S&ME following the submittal of our report, they will be forwarded to the client in the form received for evaluation by the client.

2.5 Special Terms and Conditions

All materials and information used for this project were obtained by S&ME. The resulting report is provided for the sole use of the Etowah County Commission, on the project for which it was prepared. Use of this report by any additional parties will be at such parties' risk, and S&ME disclaims liability for any use or reliance by any additional parties. No other use is authorized by S&ME.

As the client the Etowah County Commission may request in writing additional reports, name another party or parties as addressee(s) or otherwise entitle the party or parties to rely on the report. Such request for additional addressees shall include the name and addresses of the additional addressees and any suggested wording the additional addressee wishes S&ME to consider for inclusion in the report. S&ME shall have sole discretion in (1) approving client's request for issuance of reports to additional addressees, and (2) incorporating in our report any additional wording or deletions requested by the additional addressees.

Any additional addressees' use and reliance on the report will be subject to the same rights, obligations, and limitations imposed on the Etowah County Commission by the contract with the Etowah County Commission. However, the total liability of S&ME to all addressees of the Environmental Site Assessment shall be limited to the remedies and amounts as provided in the contract. The additional addressees' use and reliance on the report shall signify the additional addressees' agreement to be bound by the contract that makes up the agreement between S&ME, Inc. and the Etowah County Commission.

2.6 User Reliance

S&ME hereby acknowledges that this report may be relied upon by the Etowah County Commission subject to the limitations of the agreement between S&ME and the Etowah County Commission.

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The subject property is located on four parcels southwest of Gadsden, Alabama and includes approximately 652± acres. The subject property is depicted in Appendix A, Figures 1 through 4. Figure 2 depicts the division between the four parcels. The Etowah County Tax Office has assigned to the 277-acre tract a Parcel Number of 16-09-30-0-000-003.00 and a Property Identification Number (PIN) of 55607. The owner is listed as the W.T. Cloud Estate. The Parcel Number, owner, and PIN for the 164-acre tract is 16-09-30-0-000-004.00, Brian K. and William T. Copeland, and 55608, respectively; the Parcel Number, owner, and PIN for the 171-acre tract is 16-09-29-0-000-004.00, Robert E. Lee, Jr, Buford L. Copeland and Hoyt Wayne Copeland, and 55592, respectively; and the Parcel Number, owner, and PIN for the 40-acre tract is 16-09-31-0-000-002.00, Helen G. Cloud and Larry Whitten as Trustees of the WT Cloud Estate, and 55612, respectively.

3.2 Site and Vicinity Description

Due to the size of the property, S&ME conducted its site reconnaissance over three days on February 20 and 25, 2008 and March 5, 2008.

The subject property is located north of Interstate 59, south of U. S. Highway 11 and east of the Little Canoe Creek (county line). The subject property is accessible from Old Gaines Chapel Road to the east and Canoe Creek Road North to the west. Interstate 59 and its associated right-of-way run along the subject property's southeastern boundary. U.S. Highway 11 is located approximately 0.75-miles northwest of the subject property and the Gadsden municipal airport is located approximately 1.5-miles east-northeast of the subject property. A Norfolk-Southern railroad track runs from southwest to northeast approximately 0.15-miles northwest of the subject property.

Currently, the subject property contains no permanent buildings. The property is wooded and is transected by a natural gas and power line which runs from southwest to northeast across the western portion of the subject property. The eastern and central portions of the property are currently being used by a hunting club. The hunting club has erected numerous elevated tripod type observation/hunting blinds. There are approximately nine small fields that are planted as food plots for wildlife. S&ME observed no evidence of a firing range associated with the hunting club.

The subject property is bordered to the southeast by a gated, gravel access road that runs parallel to Interstate 59. Canoe Creek Road North is located on the western portion of the subject property and runs from north to south. The subject property has a 60 foot range in elevation change across the site, with an approximate low of 540 feet above mean sea level and an approximate high of 600 feet above mean sea level. Surface drainage on the eastern portion of the property appears to be generally directed to the southeast and surface drainage on the western portion of the property appears to be generally directed to the southwest. Little Canoe Creek constitutes a portion of the western boundary of the

subject property. There are two tributaries of Rook Creek flowing from northwest to southeast on the eastern portion of the subject property.

3.3 Current Uses of the Subject Property

Currently the eastern and central portions of the subject property are being used by a hunting club. A single wooden shed, measuring approximately 8 feet by 8 feet by 8 feet, and numerous elevated tripod type observation/hunting blinds are located on the eastern and central portions of the property, respectively. The western portion of the subject property is currently wooded and no apparent uses were observed.

3.4 Past Use(s) of the Subject Property

S&ME reviewed historical aerial photographs, city directories, and topographic maps obtained from Environmental Data Resources. The 1972, 1988, and 1997 aerial photographs appear to show the subject property as forested with small patches of agricultural use. Only residences were listed in the city directories from 1962, 1971, 1981, 1992, 2001, and 2006. The historical topographic maps from 1892, 1947, and 1972 depicted no structures on the property. No coverage of the site is provided by Sanborn fire insurance maps.

The Parsons reports reviewed at the Gadsden Library and an internet search for Camp Sibert web entries revealed information about the site area. The site was part of Camp Sibert, which was active from 1942 until 1945 as part of the Army Chemical Warfare Service. A promotional piece for Camp Sibert is shown in Appendix A, Figure 5. The Camp Sibert property was given to the local government entities in 1948 for reintegration into the tax rolls. A geophysical study by Parsons Engineering overseen by the Corps indicates anomalies on the subject property that potentially could be unexploded chemical mustard gas ordnance, which was used at Camp Sibert. A map showing the locations of the anomalies is included in Appendix A as Figure 6.

A 1946 aerial photograph was provided to S&ME by the Army Corps of Engineers. In this photograph, Interstate 59 had not yet been constructed. This photograph also shows more spaces of open fields and less heavily wooded areas than is now the case at the site. In 1946, the subject property was still part of Camp Sibert. No structures were visible on this historical photograph due to the quality and scale of the image.

Selected parts of the Parsons reports are included in Appendix C.

3.5 Structures, Roads and Other Improvements On-site

The only structure observed on the subject property was a temporary wood-sided shed with a metal roof that is located on the eastern portion of the property. There is currently a gated gravel drive that is accessed from Old Gaines Chapel Road, which runs near the southeastern boundary of the subject property. Canoe Creek Road North is located on the western portion of the subject property.

3.6 Current Use(s) of Adjoining and Surrounding Properties

The current uses of the adjoining properties were identified by a site reconnaissance.

North – The adjoining properties to the north currently consist of residential, agricultural and wooded parcels.

South – The adjoining properties to the south currently consist of residential, agricultural and wooded parcels. Interstate 59 and its associated right-of-way are adjacent to the subject property's southeastern border.

East – The adjoining properties to the east currently consist of residential, agricultural and wooded parcels.

West – The adjoining properties to the west currently consist of residential, agricultural and wooded parcels.

3.7 Past Use(s) of the Adjoining and Surrounding Properties

According to the historic information collected, the adjoining properties to the north, east, south, and west have been wooded and undeveloped, residentially, and/or agriculturally developed since 1892.

4.0 USER PROVIDED INFORMATION

4.1 Title Records

No chain of title was provided to S&ME.

4.2 Environmental Liens

No information with regard to Environmental Liens was provided to S&ME. The User Questionnaire attached to Proposal 616407178 indicated the user was not aware of any environmental liens associated with the subject property.

4.3 Specialized Knowledge

The client provided to S&ME contact information for Ms. Anderson-Hudgins of the Corps, and reported the potential for UXO as a recognized environmental condition.

4.4 Valuation Reduction for Environmental Issues

The client indicated in the user Questionnaire attached to proposal 616407178 that the user was not aware of a valuation reduction due to environmental issues.

4.5 Owner, Occupant and Property Manager Information

The current owners of the parcels of the subject property are individuals. The client did not provide S&ME with any contact information for the current owners.

4.6 Reason for Performing the Phase I ESA

Mr. Patrick Simms, CEO of Etowah County, has indicated that the reason for performing this Phase I ESA is for a potential purchase of the subject property and potential development into an industrial park. We assume also that this Phase I ESA was requested as part of Etowah County's due diligence for all appropriate inquiries prior to the purchase of the property to satisfy one requirement of the Landowner Liability Protections (LLPs) against CERCLA liability.

4.7 Other

No additional information was provided.

5.0 RECORDS REVIEW

5.1 Standard Environmental Record Sources

S&ME contracted Environmental Data Resources (EDR), to conduct an environmental search and prepare a Field Check Map Report compiling federal and state environmental database information from the regulatory records of the United States Environmental Protection Agency (US EPA) and the State of Alabama. The purpose of the EDR Report was to identify environmental sites and activities within a radius of potential concern from the subject property, as outlined by ASTM Standard Practice E 1527-05. Reference Table 1 for a list of databases searched. The EDR Report, including descriptions of the databases, is included in Appendix B.

Table 1: List of Databases Searched

Database	Search Distance (mi)	Number Plotted
Federal ASTM Standard		
NPL – National Priority List	1.00	0
Proposed NPL – Proposed National Priority List	1.00	0
Delisted NPL – National Priority List Deletions	1.00	0
NPL Recovery – Federal Superfund Liens	1.00	0
CERCLIS – Comprehensive Environmental Response, Compensation, and Liability Information	0.50	0
CERC-NFRAP – CERCLIS No Further Remedial Action Planned	0.50	0
CORRACTS – Corrective Action Report	1.00	0
RCRA-TSD - Resource Conservation and Recovery System, Treatment, Storage or Disposal Facility	0.50	0
RCRA-LQG - Resource Conservation and Recovery System, Large Quantity Generator	0.25	0
RCRA-SQG - Resource Conservation and Recovery System, Small Quantity Generator	0.25	0
ERNS – Emergency Response Notification System	TP	0
HMIRS – Hazardous Materials Information Reporting System	TP	0
US ENG CONTROLS	0.50	0
US INST CONTROL	0.50	0
DOD – Department of Defense Sites	1.00	0
FUDS – Formerly Used Defense Sites	1.00	0
US Brownfields – A Listing of Brownfields Sites	0.50	0
CONSENT – Superfund (CERCLA) Consent Decrees	1.00	0
ROD – Records of Decision	1.00	0
UMTRA- Uranium Mills Tailings Sites	0.50	0
ODI – Open Dump Inventory	0.50	0
TRIS – Toxic Chemical Release Invent System	TP	0

TSCA – Toxic Substance Control Act	TP	0
FTTS – Federal Insecticide, Fungicide and Rodenticide and TSCA Tracking System	TP	0
SSTS – Section 7 Tracking Systems	TP	0
PADS – PCB Activity Database	TP	0
MLTS – Material Licensing Tracking System	TP	0
MINES – Mines Master Index File	0.25	0
FINDS – Facility Index System	TP	0
RAATS – RCRA Administrative Action Tracking Sys	TP	0
State and Local ASTM – Standard		
SHWS – Inactive Hazardous Sites Inventory	1.00	0
State LF – List of Solid Waste Facilities	0.50	0
LUST – Leaking Underground Storage Tank Database	0.50	0
LUST_TRUST – LUST Trust Fund Database	0.50	0
HIST_LUST CO – Leaking UST Database	0.50	0
UST – Underground Storage Tank Database	0.25	0
HIST_UST CO –UST Database	0.25	0
AST – Above Ground Storage Tank Database	0.25	0
Inst Control – No Further Action Sites with Land Use Restrictions Monitoring	0.50	0
VCP – Responsible Party Voluntary Action Sites	0.50	0
Drycleaners – Dry Cleaning Sites	0.25	0
Brownfields – Brownfields Projects Inventory	0.50	0
Tribal Records		
Indian Reserv. – Indian Reservations	1.00	0
INDIAN LUST – Leaking Underground Storage Tanks on Indian Land	0.50	0
INDIAN UST –Underground Storage Tanks on Indian Land	0.25	0
Manufactured Gas Plants- Coal Gas Plants	1.00	0

Note: The Target Property (TP) is the 652-acre subject property.

The EDR Field Check Radius Map Report identified no sites within applicable search distances.

The EDR Orphan Summary list was reviewed and none of the listed orphan/unmappable sites were recognized as being in close proximity to the subject property. However, due to the limited data provided by EDR, S&ME was unable to verify the locations of all of the facilities.

5.2 Additional Environmental Record Sources

S&ME found through a web search a report prepared in October 2007 by the U.S. Department of Health and Human Services' Agency for Toxic Substance and Disease Registry (ATSDR). This report is included in Appendix C. The report describes potential exposure pathways of the contaminants contained within the UXOs on Camp Sibert. This

report does not provide additional information, but does qualify the risk to human health posed by the potential UXO.

5.3 Physical Setting Sources

S&ME personnel reviewed the USGS 7.5-minute series Steele, Alabama topographic map dated 1972 to examine the topography and drainage of the subject property and vicinity. Figure 3 represents a portion of the USGS topographic map.

The USGS topographic map reveals that the site generally slopes from north to south. The subject property has a range in elevation of approximately 540 feet above mean sea level to 600 feet above mean sea level.

The property is located in the southern portion of the Valley and Ridge Geologic Province. Differential weathering and erosion of folded and faulted sedimentary lithologies have produced a series of subparallel valleys and ridges oriented generally southwest to northeast. The ridges are typically formed on resistant sandstones, shales, and dolomites. Between ridges, broad valleys and rolling hills are formed primarily on limestones and less resistant dolomites and shales. The site is underlain by the Knox Group which consists of Lower Ordovician to Cambrian dolomite and dolomitic limestone, the Chattanooga shale, which consists of black bituminous shale, and the Fort Payne chert, which is a silicious, cherty limestone.

In the Appalachian Valley and Ridge geologic province, the slope of the water table under static conditions (no pumping interference) often approximates the land surface topography.

5.4 Historic Use Information on the Property

The historic use of the property was evaluated using historic aerial photographs, historical topographic maps and city directories.

5.4.1 Historic Aerial Photographs

S&ME contracted with Environmental Data Resources, Inc. (EDR) to conduct a database search of historic aerial photographs in order to examine past land use of the subject property and vicinity. Aerial photographs dated 1972, 1988, and 1997 were reviewed. A 2006 aerial photograph was reviewed from data obtained from <http://maps.live.com>. The 2006 aerial photograph is included as Figure 4 in Appendix A.

The 1972 aerial photograph has a scale of 1"=750'. In this photograph, the subject property appears to be wooded and undeveloped with the exception of a road on the western portion of the property and a road which runs along the southeastern boundary of the property. Adjacent properties appear to be residentially and agriculturally developed.

The 1988 aerial photograph has a scale of 1"=1,000'. In this photograph, the subject property and adjacent properties appear to be generally unchanged from the 1972 aerial photograph.

The 1997 aerial photograph has a scale of 1"=750'. In this photograph, the subject property and adjacent properties appear to be generally unchanged from the 1972 and 1988 aerial photographs.

The 2006 aerial photograph is not to scale. In this photograph, the subject property appears to be mostly wooded. The hunting club's food plots are also visible.

There was no direct evidence on the reviewed aerial photographs indicating that open dumping, drum storage, or hazardous material storage has occurred on the subject property. However, the scale and clarity of the reviewed aerial photographs prohibited the identification of smaller areas of potential open dumping, drum storage, or hazardous material storage.

5.4.2 Sanborn Maps

S&ME contracted with EDR to conduct a database search of Sanborn Fire Insurance maps that depicted the subject property. EDR reported no Sanborn map coverage for the subject property.

5.4.3 City Directories

S&ME contracted with EDR to conduct a database search of applicable city directories. Directories were searched for the years 2006, 2001, 1992, 1981, 1971, and 1962. The subject property was not listed in any of the retrieved city directory listings.

5.4.4 Tribal Records

S&ME conducted a search on the EPA American Indian Environmental Office to determine if there are federally recognized tribal contacts in Alabama. The search revealed the Poarch Band of Creek Indians as the only federally recognized tribal contact in Alabama. The Poarch tribe is located near Mobile, Alabama and not near the subject property.

5.4.5 Historic Topographic Maps

S&ME reviewed available USGS historic topographic maps as a standard historic source to address data gaps. The mapping typically identifies on-site structures and helps to establish general property use in the vicinity. S&ME reviewed the 7.5' Steele, Alabama quadrangle maps for 1947 and 1972 with scales of 1:24,000, a 15' Steele, Alabama quadrangle map for 1947 with a scale of 1:62,500, and a 30' Springville, Alabama quadrangle map for 1892 with a scale of 1:125,000. All of the reviewed topographic maps indicated the subject property is traversed by Canoe Creek Road, which is currently an unpaved dirt and gravel road. No structures were evident on the subject property. Small structures are depicted on the adjoining properties to the south, east and west in the 1972 topographic map.

5.5 Historic Use Information on Adjoining Properties

Based on the above research, all adjoining properties to the north, east or west have been either undeveloped wooded parcels or residentially developed parcels since prior to 1946. The 1972 aerial photograph and topographic map show Interstate 59. A residence appears

to be located between the subject property and Interstate 59 in the 1972 and later aerial photographs.

6.0 INFORMATION FROM THE SITE RECONNAISSANCE

6.1 Methodology and Limiting Conditions

Bob Jackson, Barry Burnette, and Tyler Thompson of S&ME performed a site reconnaissance of the property. The methodology used during the February 20 and 25 and March 5, 2008, site reconnaissance consisted of a walkover of the perimeter of the subject property and traversing the property interior on foot and on all-terrain vehicles, followed by a vehicular survey of the surrounding area. The purpose of the site reconnaissance was to identify *recognized environmental conditions* at the subject property and identify sites of similar environmental concern located within 0.5 mile. S&ME personnel searched for evidence of past or present activities which could have led to the deposition of hazardous substances or petroleum products. Representative photographs are included Figure 7 in Appendix A.

6.2 General Site Setting

6.2.1 Current Use(s) of the Property

Currently the subject property is a vacant wooded tract. The eastern portion of the subject property is currently being used by a hunting club. The presence of the hunting club is evident by a "sign-in" shed. Next to the shed were a plow implement and a metal 55-gallon drum that appeared to be empty. There was no label on the drum. Other evidence of the hunting club were numerous elevated hunting/observation blinds. There are approximately nine planted fields on the central and middle portions of the subject property. The western portion of the subject property does not appear to be used. No surficial evidence of recognized environmental conditions was observed during the site reconnaissance.

6.2.2 Current Use(s) of the Adjoining and Surrounding Properties

The current uses of the adjoining and surrounding properties were identified by a site reconnaissance.

North – The adjoining properties to the north are currently a mixture of residential, agricultural and wooded parcels.

South – The adjoining properties to the south are currently a mixture of residential, agricultural and wooded parcels. Interstate 59 parallels the southeastern boarder of the subject property.

East – The adjoining properties to the east are currently a mixture of residential, agricultural and wooded parcels.

West – The adjoining properties to the west are currently a mixture of residential, agricultural and wooded parcels.

6.2.3 Geologic, Hydrogeologic, Hydrologic and Topographic Conditions

The eastern side of the subject site generally slopes from north to southeast, while the southern portion generally slopes to the west, and the western portion generally slopes to the southwest.

Information pertaining to geologic and hydrogeologic conditions obtained from standard resources is provided in Section 5.3.

6.2.4 General Description of Roads and Structures

The subject property is accessible from Canoe Creek Road North and Old Gaines Chapel Road. The only structure observed on the property was a temporary shed on the eastern portion of the subject property.

6.2.5 Potable Water and Sewage Disposal System

The residences around the subject property appeared to be connected to private well systems for drinking water and to private septic systems, as no evidence of public water utilities was observed along the roads adjacent to the site.

6.3 On-Site Exterior Observations

Since there are no permanent structures on the site, there were no exterior observations.

6.4 On-Site Interior Observations

Since there are no permanent structures on the site, there were no interior observations.

7.0 INTERVIEWS

7.1 Interviews with Current and Past Owners

The client did not provide S&ME with contact information for the current owners. Mr. Simms, CEO of Etowah County, said he was unaware of any environmental liens, cleanups, or deed restrictions associated with the subject property.

7.2 Interview with Site Manager

The subject property is not managed.

7.3 Interviews with Current and Past Occupants

The client did not provide contact information for personnel of the hunting club.

7.4 Interviews with Local Government Officials

S&ME contacted the Etowah County Fire Department concerning any responses or spills involving petroleum products or hazardous materials on or in the vicinity of the subject property. No hazardous material calls have been reported at the site.

7.5 Interviews with Others

S&ME interviewed Ms. Sherri Anderson-Hudgins of the Army Corps of Engineers and Mr. Greg Nivens of Parsons Engineering. These findings are included throughout the report.

8.0 FINDINGS

8.1 On-Site Findings

Currently the subject property is an approximately 652-acre parcel of forests, streams, and food plots for wildlife. The only structure observed on the property was a three-sided wood shed for a hunt club.

Historically, the subject property was part of the former 37,000 acre Camp Sibert, Army Chemical Warfare training facility. Unexploded ordnance, which reportedly can contain mustard gas, phosgene, or other chemical toxins, has been found in other sections of the former Army base. The assessment and planned cleanup of UXO is being directed by the U.S. Army Corps of Engineers and Parsons Engineering. A geophysical survey conducted in 2007 identified dozens of metal anomalies on the subject property.

8.2 Off-Site Findings

Except for roads, the surrounding properties are and have been used since at least 1946 for residential, pasture lands, or as vacant woods. There were no listings/sites identified in the EDR report. The surrounding properties were also part of the former Camp Sibert.

9.0 OPINIONS

9.1 On-Site Opinions

The potential for chemical warfare UXO on the site is interpreted as a recognized environmental condition.

9.2 Off-Site Opinions

The amount of chemical material contained within the UXO is rather small. Except for a potential release very close to the site property line, Parsons Engineering reports that it is unlikely that any UXO on surrounding properties would impact the subject site. No other recognized environmental conditions were identified for the off-site properties in relation to the subject property.

9.3 Data Gaps

Data gaps concerning historical resources (aerial photographs, historical topographic maps, Sanborn maps, and city directories) exist. These data gaps are not considered significant relative to the historical uses of the subject property and surrounding properties.

Interviews with the current and previous owners of the subject property were not obtained during this assessment. This data gap is not considered significant since the historical records indicate the subject property has not been commercially developed.

10.0 CONCLUSIONS

We have performed this Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E 1527-05 for an approximately 652-acre property (tax parcel numbers of 16-09-30-0-000-003.00, 16-09-30-0-000-004.00, 16-09-29-0-000-004.00, and 16-09-31-0-000-002.00) located near Gadsden, in Etowah County, Alabama. Any exceptions to or deletions from this practice are described in Section 2.4 of this report. Based on the results of this Phase I ESA, S&ME found evidence of a recognized environmental condition in connection with the subject property. The potential for unexploded ordnance from operations at the former Camp Sibert is interpreted as a recognized environmental condition.

Based on the results of this Phase I ESA, S&ME, Inc. found the potential of ordnance on the subject property from the activities on the former Camp Sibert is evidence of a recognized environmental condition in connection with the subject property. Considering the findings and opinions relative to on-site and off-site conditions described above, additional investigation would be required to evaluate further whether hazardous materials or petroleum products are present in the ground, groundwater, or surface water of the subject property. As stated previously, the amount of chemical material contained within the UXO is relatively small. Any effort to evaluate potential impacts should be closely coordinated with the UXO assessment and cleanup being directed by the Corps and Parsons.

11.0 DEVIATIONS

ASTM Standard Practice E1527-05 requires that past owners of the subject property be interviewed. Based on the records review and historical documentation, this data gap is not considered significant.

12.0 ADDITIONAL SERVICES

No additional services were performed by S&ME as part of this Phase I ESA.

13.0 REFERENCES

Material references are cited within their respective sections.

14.0 SIGNATURES AND ENVIRONMENTAL PROFESSIONAL STATEMENT

We, Robert A. Jackson and Elizabeth M. Porter, declare that, to the best of our knowledge, we meet the definition of Environmental Professional as defined in Paragraph 312.10 of 40 CFR 312, and have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Robert A. Jackson
Environmental Professional



Elizabeth M. Porter
Environmental Professional

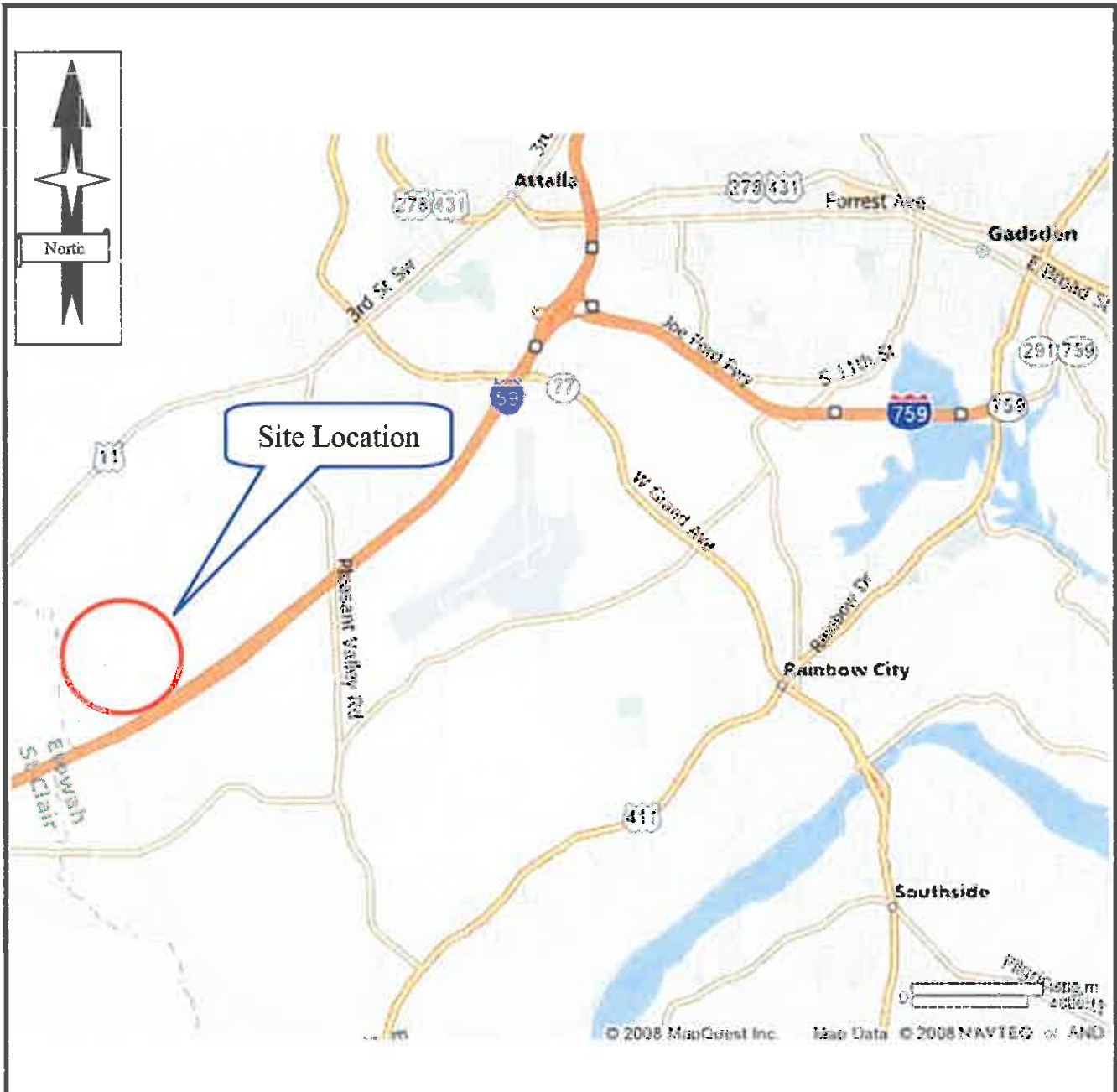
15.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

S&ME provides a broad range of environmental services, including site assessments for real estate transactions. S&ME has over 800 employees located in twenty offices throughout the southeast. ENR ranked S&ME as one of the 200 largest environmental firms in the country.

The senior reviewer and environmental professional for this project is Elizabeth M. Porter. Ms. Porter has over 18 years experience in conducting environmental assessment activities. Please refer to Ms. Porter's resume in Appendix F for further details.


The environmental professional for this project is Robert A. Jackson. Mr. Jackson has over 10 years of environmental experience. Projects he has managed include Phase I and Phase II Environmental Site Assessments, soil and groundwater assessment and remediation. Please refer to Mr. Jackson's resume in Appendix F for further details.

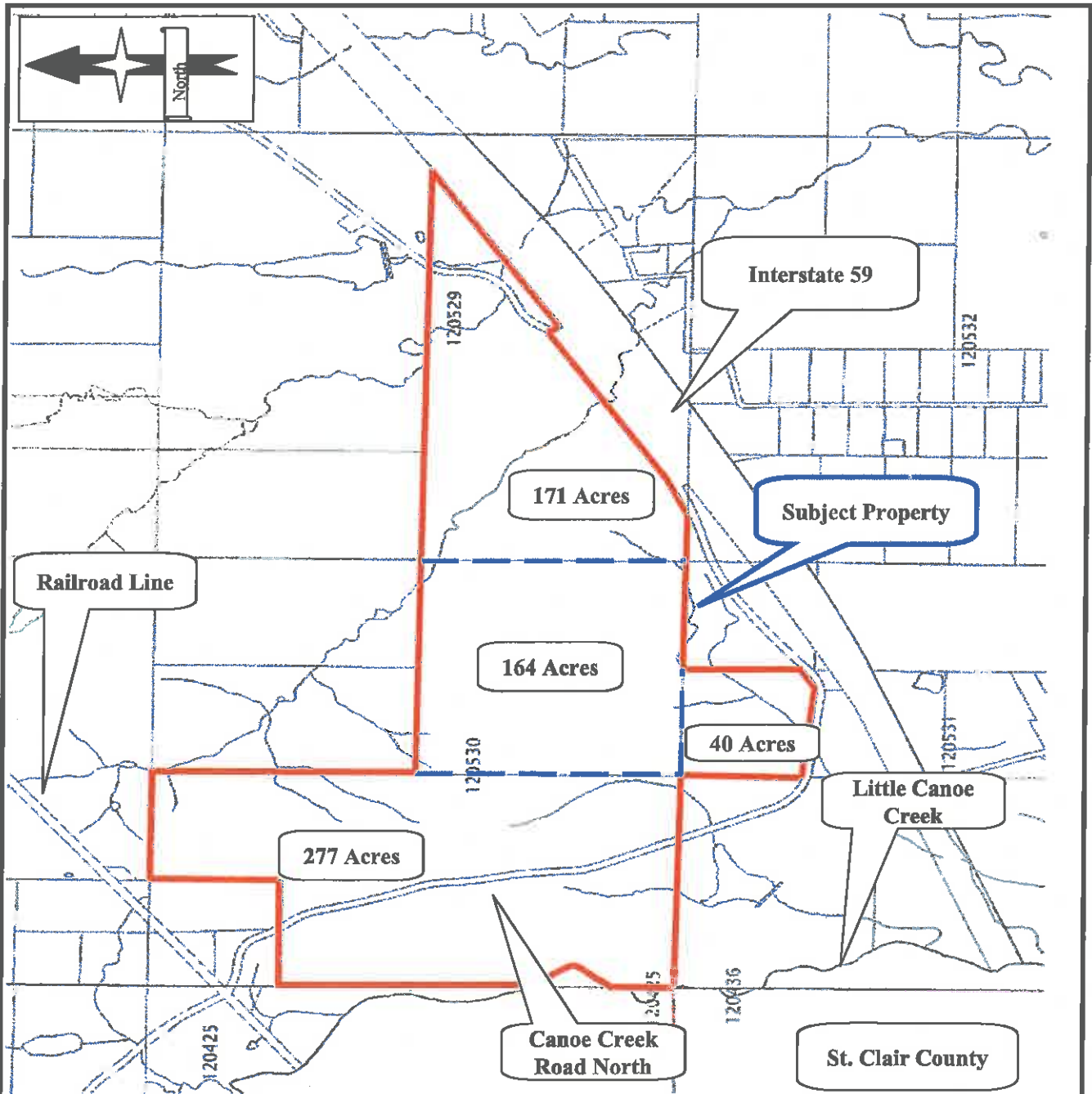
APPENDIX A
FIGURES



Reference


The depicted street map information was obtained from the Mapquest webpage: <http://www.mapquest.com>. Be advised this data is for informational purposes only. It is not meant for design, legal, or any other uses. There are no guarantees about its accuracy. S&ME, Inc. assumes no responsibility for any decisions made or any actions taken by the user based upon information obtained from the above data. Please note this data is being freely given to the intended user of this map for reference only. S&ME, Inc. is only selling its services. Locations are approximate.

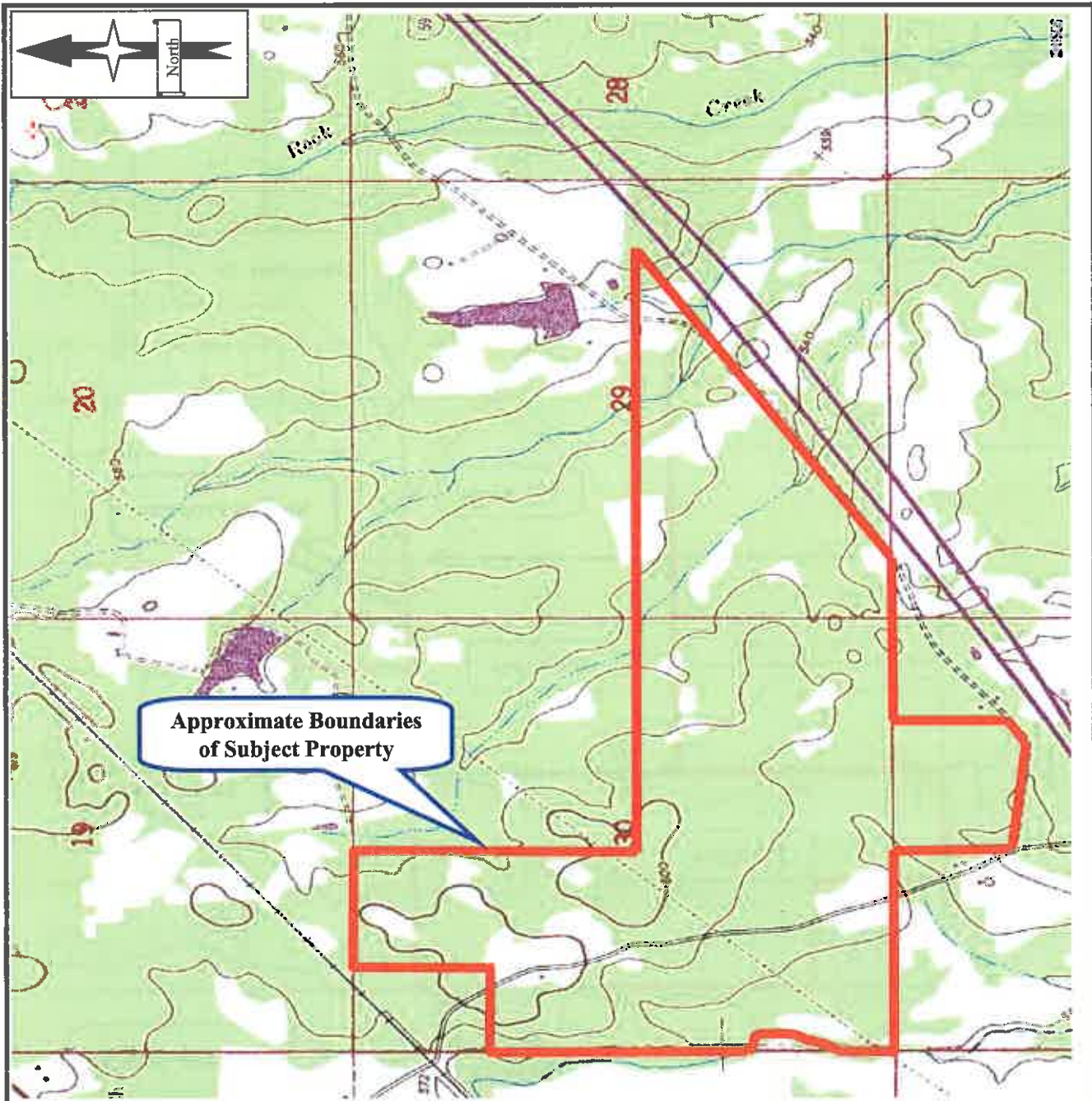
Scale: As Shown		<p align="center">SITE VICINITY MAP Proposed Little Canoe Creek Industrial Park Gadsden, Alabama</p>	<p align="center">Figure 1</p>
Checked By: RAJ			
Date: 3/7/08			



Reference


The depicted parcel information was obtained from the Etowah County Tax Commission office. Be advised this data is for informational purposes only. It is not meant for design, legal, or any other uses. There are no guarantees about its accuracy. S&ME, Inc. assumes no responsibility for any decisions made or any actions taken by the user based upon information obtained from the above data. Please note this data is being freely given to the intended user of this map for reference only. S&ME, Inc. is only selling its services. Locations are approximate.

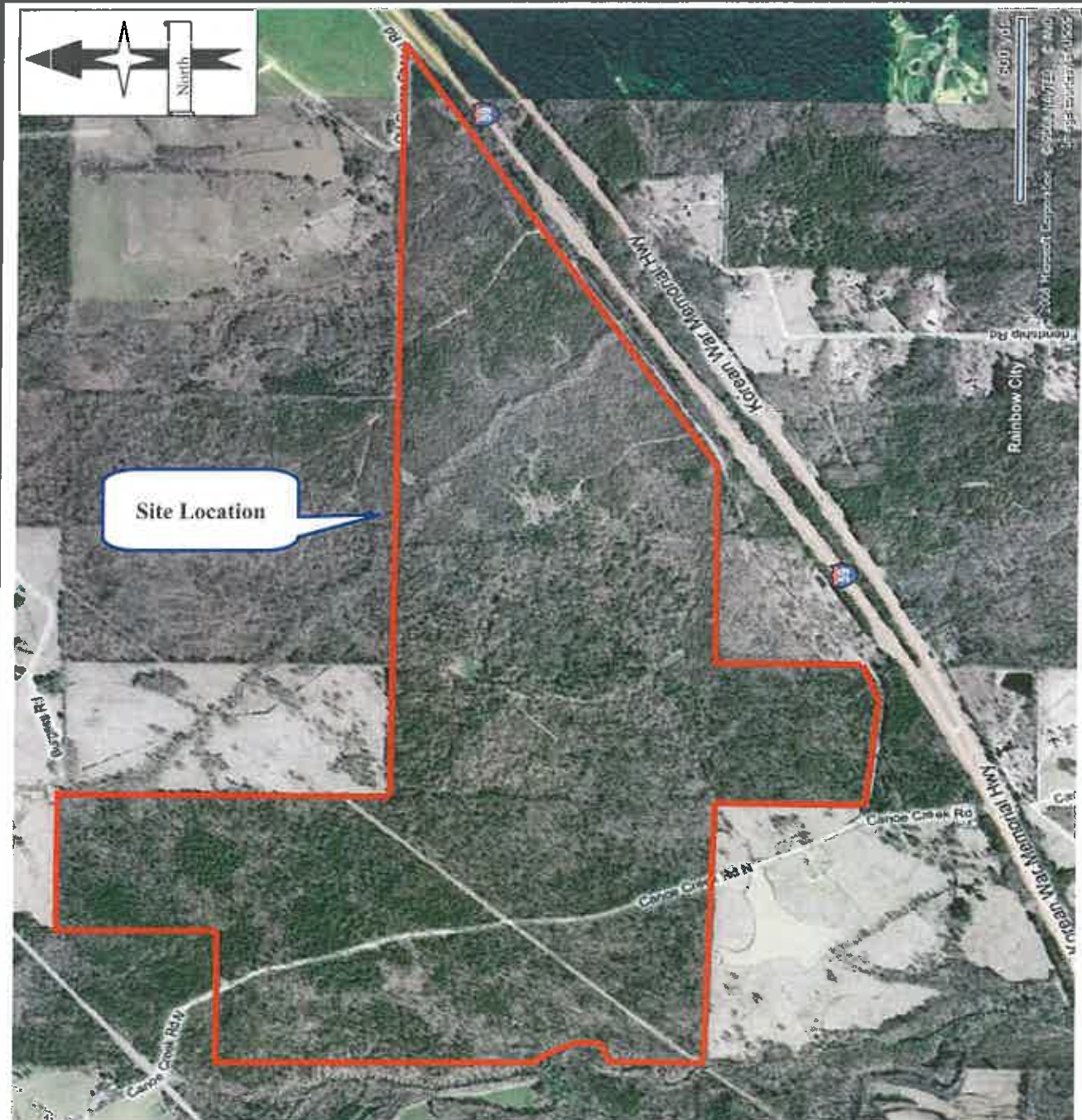
Scale: NTS		TAX MAP	Figure 2
Checked By: RAJ		Proposed Little Canoe Creek Industrial Park Gadsden, Alabama	
Date: 3/7/08		Project No. 1464-08-003	



Reference

The depicted topographic information was obtained from the TerraServer webpage: <http://terraserver-usa.com/>. Be advised this data is for informational purposes only. It is not meant for design, legal, or any other uses. There are no guarantees about its accuracy. S&ME, Inc. assumes no responsibility for any decisions made or any actions taken by the user based upon information obtained from the above data. Please note this data is being freely given to the intended user of this map for reference only. S&ME, Inc. is only selling its services. Locations are approximate. Portion of USGS Steele, Alabama 7.5 Minute Quadrangle, 1972.

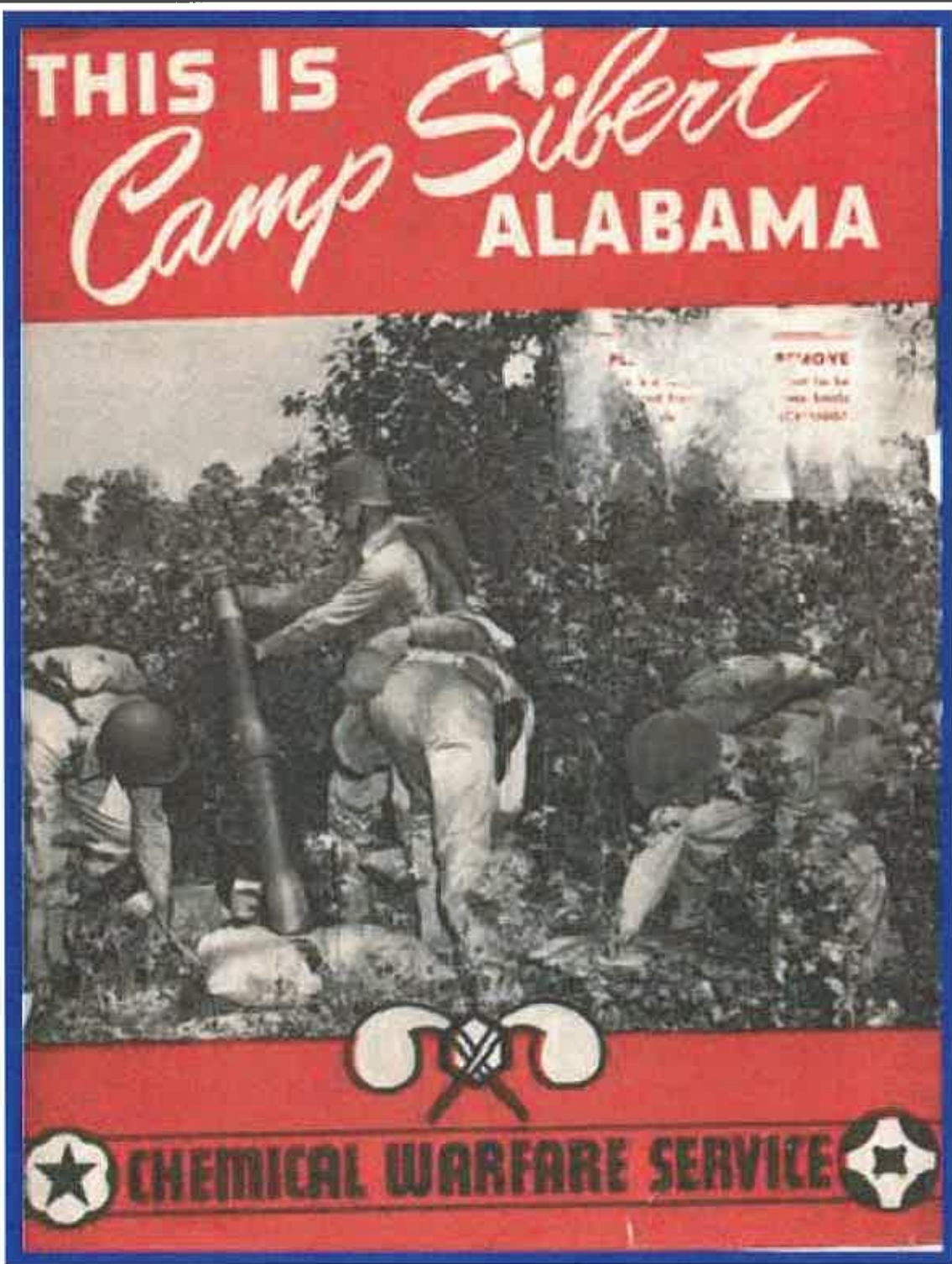
Scale: NTS		TOPOGRAPHIC MAP Proposed Little Canoe Creek Industrial Park Gadsden, Alabama	Figure 3
Checked By: RAJ			
Date: 3/7/08			




Reference

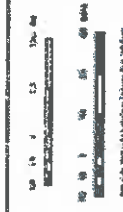
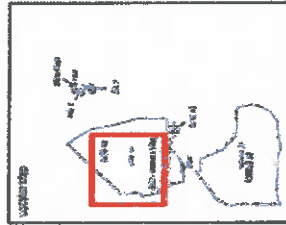
The depicted aerial imagery was obtained from the Microsoft Virtual Earth webpage: <http://maps.live.com>. Be advised this data is for informational purposes only. It is not meant for design, legal, or any other uses. There are no guarantees about its accuracy. S&ME, Inc. assumes no responsibility for any decisions made or any actions taken by the user based upon information obtained from the above data. Please note this data is being freely given to the intended user of this map for reference only. S&ME, Inc. is only selling its services. Locations are approximate.

Scale: NTS		2006 AERIAL PHOTOGRAPH Proposed Little Canoe Creek Industrial Park Gadsden, Alabama	Figure 4
Checked By: JAH		Project No. 1464-08-003	
Date: 3/7/08			

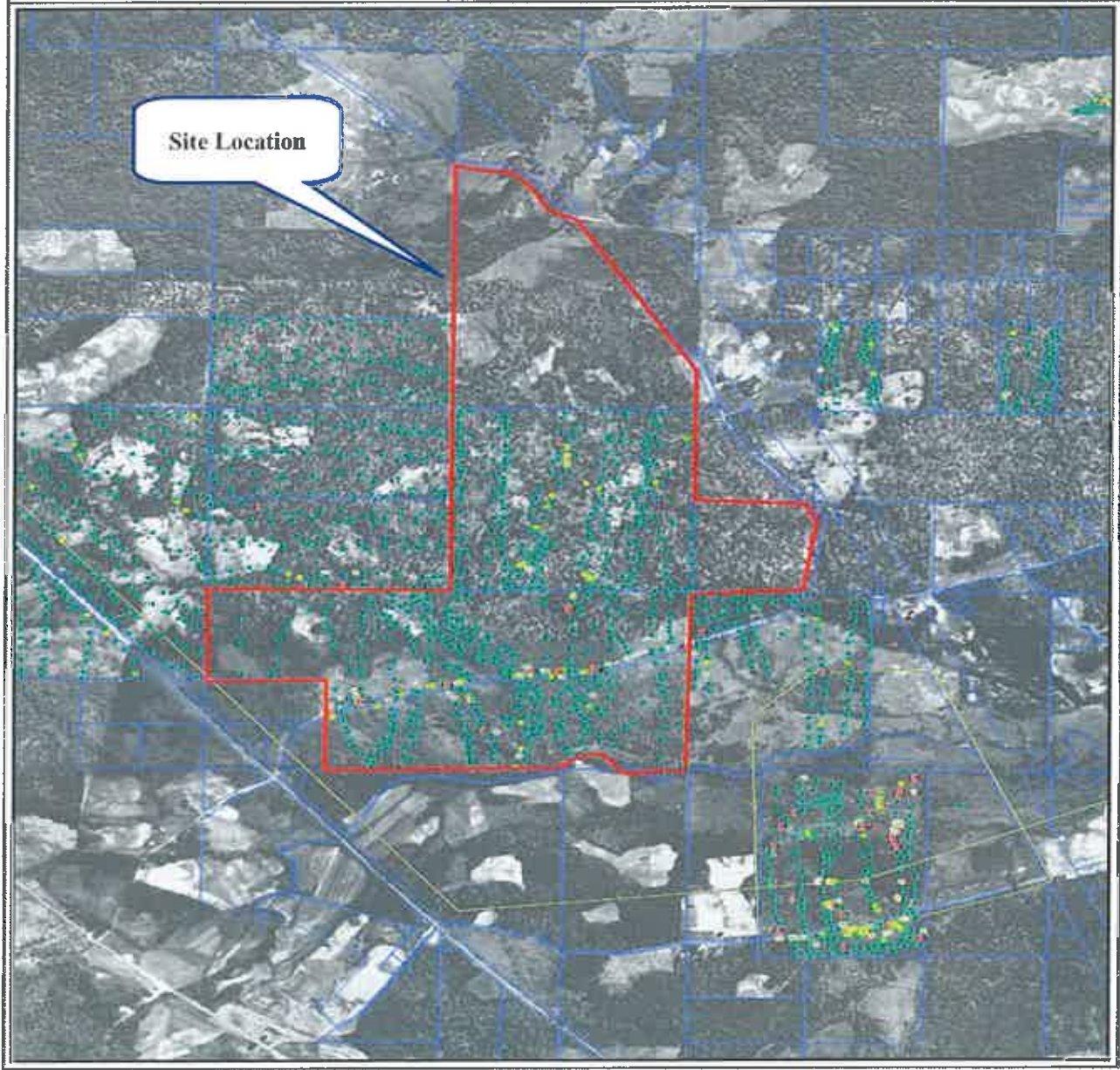


<p>Scale: As Shown</p>		<p>CAMP SIBERT PROMOTION Proposed Little Canoe Creek Industrial Park Gadsden, Alabama</p>	<p>Figure 5</p>
<p>Checked By: RAJ</p>		<p>Project No. 1464-08-003</p>	
<p>Date: 3/7/08</p>			

Former Camp Sibert



U.S. ARMY CORPS OF ENGINEERS		DA FORM 2020-02	
FORMER CAMP SIBERT, ALABAMA			
DATE	2/25	SCALE	AS SHOWN
PROJECT NO.	1464-08-003	BY	RAJ
APPROVED		DATE	



Scale: As Shown

Checked By: RAJ

Date: 3/7/08



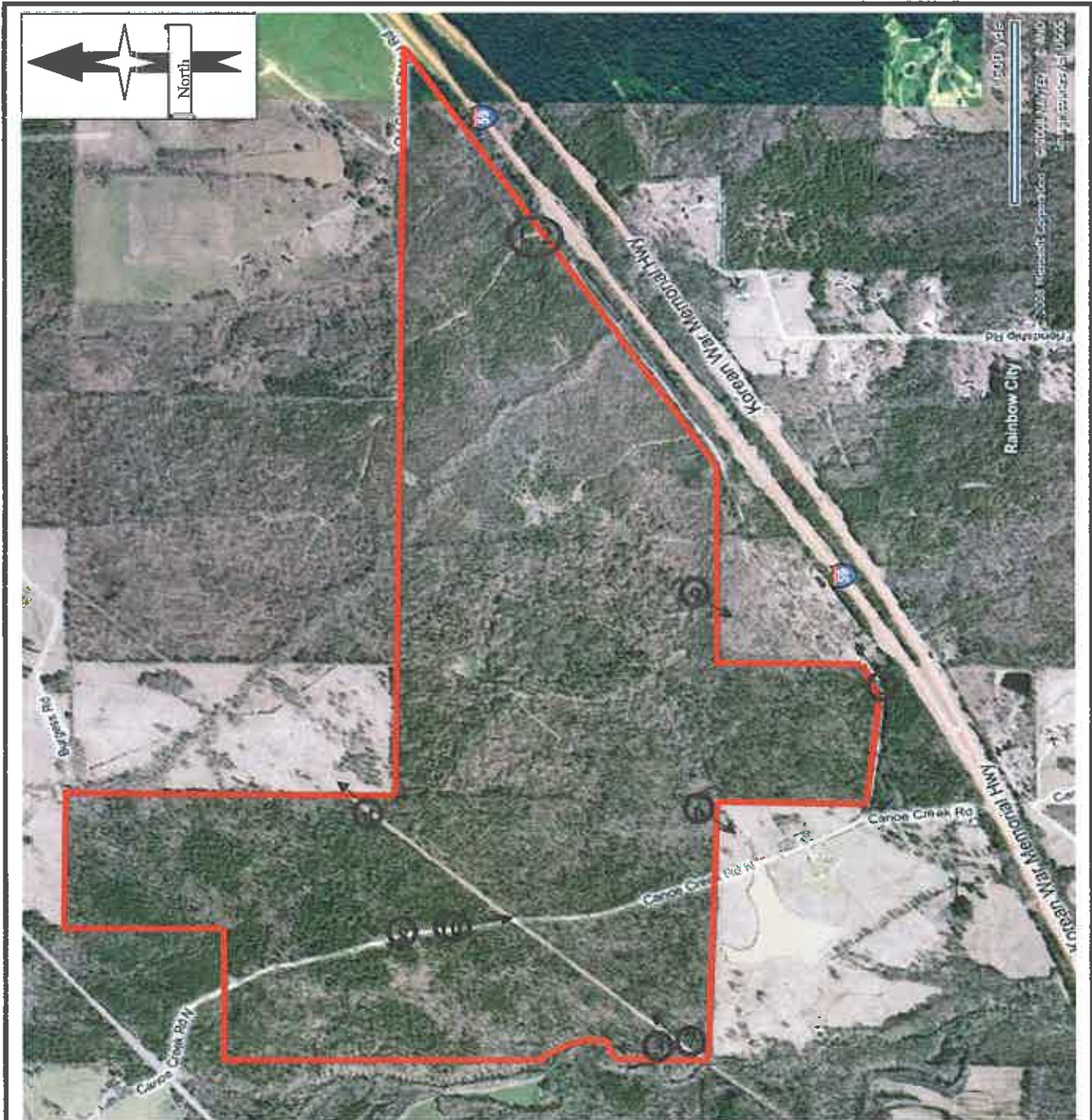
2007 PARSONS GEOPHYSICAL RESULTS OVER 1946 AERIAL PHOTOGRAPH

Proposed Little Canoe Creek Industrial Park
Gadsden, Alabama

Project No. 1464-08-003

Figure

6



Reference

The depicted aerial imagery was obtained from the Microsoft Virtual Earth webpage: <http://maps.live.com>. Be advised this data is for informational purposes only. It is not meant for design, legal, or any other uses. There are no guarantees about its accuracy. S&ME, Inc. assumes no responsibility for any decisions made or any actions taken by the user based upon information obtained from the above data. Please note this data is being freely given to the intended user of this map for reference only. S&ME, Inc. is only selling its services. Locations are approximate.


Scale: NTS		<p>PHOTOGRAPH LOCATIONS Proposed Little Canoe Creek Industrial Park Gadsden, Alabama</p>	<p>Figure 7</p>
Checked By: JAH		<p>Project No. 1464-08-003</p>	
Date: 3/7/08			

Figure 8: SITE PHOTOGRAPHS

PROJECT NO.: 1464-08-003
CAMERA MAKE: Sony Cyber Shot

PROJECT NAME: Little Canoe Creek Industrial Park
LOCATION: Gadsden, Alabama



PHOTOGRAPH NO.: 1
DATE: 02/20/08
PHOTOGRAPHER: B. Jackson
COMMENTS: View of the hunting club shed.



PHOTOGRAPH NO.: 2
DATE: 02/20/08
PHOTOGRAPHER: B. Jackson
COMMENTS: View of a map inside the hunting club shed.

Figure 8: SITE PHOTOGRAPHS

PROJECT NO.: 1464-08-003
CAMERA MAKE: Sony Cyber Shot

PROJECT NAME: Little Canoe Creek Industrial Park
LOCATION: Gadsden, Alabama



PHOTOGRAPH NO.: 3
DATE: 02/25/08
PHOTOGRAPHER: B. Jackson
COMMENTS: Looking upstream (north), view of Little Canoe Creek at the site's southwestern boundary corner.



PHOTOGRAPH NO.: 4
DATE: 02/25/08
PHOTOGRAPHER: B. Jackson
COMMENTS: Looking northeast from the northern portion of the site.

Figure 8: SITE PHOTOGRAPHS

PROJECT NO.: 1464-08-003
CAMERA MAKE: Sony Cyber Shot

PROJECT NAME: Little Canoe Creek Industrial Park
LOCATION: Gadsden, Alabama



PHOTOGRAPH NO.: 5
DATE: 02/25/08
PHOTOGRAPHER: B Jackson
COMMENTS: Looking east from the end of Canoe Creek Road, view of the adjacent residence south of the site. Interstate 59 is to the south of the photograph.



PHOTOGRAPH NO.: 6
DATE: 03/05/08
PHOTOGRAPHER: B. Jackson
COMMENTS: Looking west from the site's southwestern portion, view of fields on adjacent properties.

Figure 8: SITE PHOTOGRAPHS

PROJECT NO.: 1464-08-003
CAMERA MAKE: Sony Cyber Shot

PROJECT NAME: Little Canoe Creek Industrial Park
LOCATION: Gadsden, Alabama



PHOTOGRAPH NO.: 7
DATE: 02/25/08
PHOTOGRAPHER: B Jackson
COMMENTS: Looking northeast from Little Canoe Creek at the southwestern portion of the site.



PHOTOGRAPH NO.: 8
DATE: 02/25/08
PHOTOGRAPHER: B. Jackson
COMMENTS: Looking east on the site from Canoe Creek Road towards a stream and forest.

Figure 8: SITE PHOTOGRAPHS

PROJECT NO.: 1464-08-003
CAMERA MAKE: Sony Cyber Shot

PROJECT NAME: Little Canoe Creek Industrial Park
LOCATION: Gadsden, Alabama



PHOTOGRAPH NO.: 9
DATE: 02/25/08
PHOTOGRAPHER: B Jackson
COMMENTS: Looking south from the site towards the mobile home along Interstate 59.



PHOTOGRAPH NO.: 10
DATE: 03/05/08
PHOTOGRAPHER: B. Jackson
COMMENTS: Looking south on the site from Canoe Creek Road.

APPENDIX B
EDR RADIUS MAP REPORT

**EDR Radius Map™
with GeoCheck®**

Prepared using the EDR FieldCheck® System

**Proposed Little Canoe Creek Industrial Park
Canoe Creek Road North
Gadsden, AL 35954**

Inquiry Number: 2147001.2s

February 29, 2008



**EDR® Environmental
Data Resources Inc**

**The Standard in
Environmental Risk
Information**

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
Executive Summary	ES1
Overview Map	2
Detail Map	3
Map Findings Summary	4
Map Findings	6
Orphan Summary	7
Government Records Searched/Data Currency Tracking	GR-1
 <u>GEOCHECK ADDENDUM</u>	
Physical Setting Source Addendum	A-1
Physical Setting Source Summary	A-2
Physical Setting Source Map	A-7
Physical Setting Source Map Findings	A-8
Physical Setting Source Records Searched	A-9

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of the environmental records was conducted by Environmental Data Resources, Inc. (EDR). S&ME used the EDR FieldCheck System to review and/or revise the results of this search, based on independent data verification by S&ME. The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-05) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

CANOE CREEK ROAD NORTH
GADSDEN, AL 35954

COORDINATES

Latitude (North): 33.957960 - 33° 57' 28.7"
Longitude (West): 86.151030 - 86° 9' 3.7"
Universal Transverse Mercator: Zone 16
UTM X (Meters): 578442.0
UTM Y (Meters): 3757625.0
Elevation: 582 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 33086-H2 STEELE, AL
Most Recent Revision: 1972

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No sites were identified in following databases.

FEDERAL RECORDS

NPL	National Priority List
Proposed NPL	Proposed National Priority List Sites
Delisted NPL	National Priority List Deletions
NPL LIENS	Federal Superfund Liens
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CERC-NFRAP	CERCLIS No Further Remedial Action Planned
LIENS 2	CERCLA Lien Information
CORRACTS	Corrective Action Report
RCRA-TSDF	RCRA - Transporters, Storage and Disposal
RCRA-LQG	RCRA - Large Quantity Generators
RCRA-SQG	RCRA - Small Quantity Generators
RCRA-CESQG	RCRA - Conditionally Exempt Small Quantity Generator

EXECUTIVE SUMMARY

RCRA-NonGen	RCRA - Non Generators
US ENG CONTROLS	Engineering Controls Sites List
US INST CONTROL	Sites with Institutional Controls
ERNS	Emergency Response Notification System
HMIRS	Hazardous Materials Information Reporting System
DOT OPS	Incident and Accident Data
US CDL	Clandestine Drug Labs
US BROWNFIELDS	A Listing of Brownfields Sites
DOD	Department of Defense Sites
FUDS	Formerly Used Defense Sites
LUCIS	Land Use Control Information System
CONSENT	Superfund (CERCLA) Consent Decrees
ROD	Records Of Decision
UMTRA	Uranium Mill Tailings Sites
ODI	Open Dump Inventory
DEBRIS REGION 9	Torres Martinez Reservation Illegal Dump Site Locations
MINES	Mines Master Index File
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
HIST FTTS	FIFRA/TSCA Tracking System Administrative Case Listing
SSTS	Section 7 Tracking Systems
ICIS	Integrated Compliance Information System
PADS	PCB Activity Database System
MLTS	Material Licensing Tracking System
RADINFO	Radiation Information Database
FINDS	Facility Index System/Facility Registry System
RAATS	RCRA Administrative Action Tracking System

STATE AND LOCAL RECORDS

SHWS	Hazardous Substance Cleanup Fund
SWF/LF	Permitted Landfills
SWRCY	Recycling/Recovered Materials Processors Directory
LUST	Leaking Underground Storage Tank Listing
AOCONCERN	Area of Concern
UST	Underground Storage Tank Information
LAST	List of AST Release Incidents
AST	Aboveground Storage Tank Sites
SPILLS	Emergency Response Data
ENG CONTROLS	Engineering Controls Site Listing
INST CONTROL	Land Division Brownfields 128(a) Program Site Listing
VCP	Cleanup Program Inventory
BROWNFIELDS	Land Division Brownfields 128(a) Program Site Listing
CDL	Clandestine Methamphetamine Lab Sites
TIER 2	Tier 2 Data Listing

TRIBAL RECORDS

INDIAN RESERV	Indian Reservations
INDIAN ODI	Report on the Status of Open Dumps on Indian Lands
INDIAN LUST	Leaking Underground Storage Tanks on Indian Land
INDIAN UST	Underground Storage Tanks on Indian Land

EDR PROPRIETARY RECORDS

Manufactured Gas Plants	EDR Proprietary Manufactured Gas Plants
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EXECUTIVE SUMMARY

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were not identified.

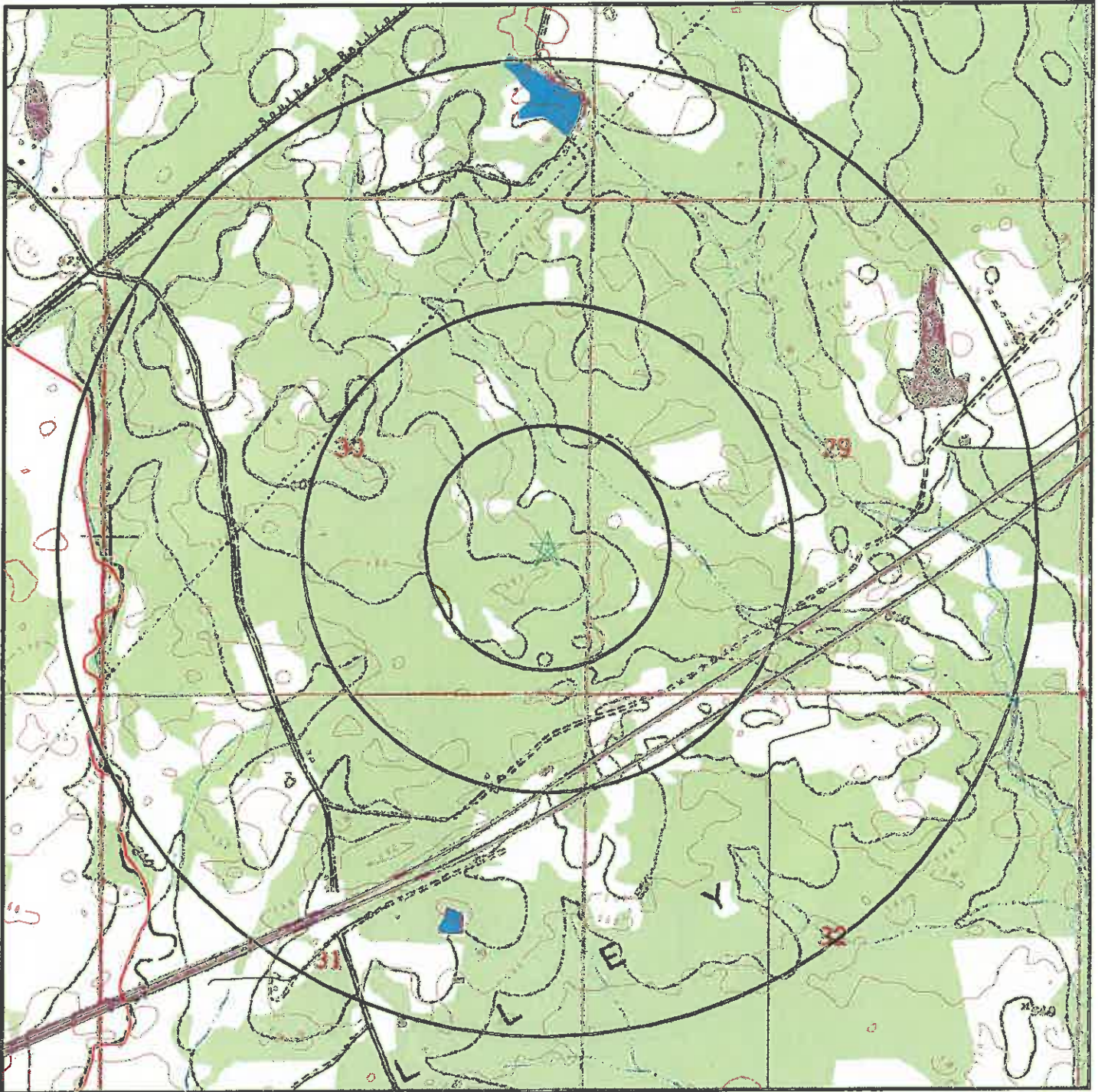
Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

<u>Site Name</u>	<u>Database(s)</u>
GADSDEN RIVERFRONT REDEVELOPMENT PROJECT	VCP, SHWS
HUMANE SOCIETY DRUM SITE	SHWS
WHITES CHAPEL DRUM SITE	SHWS
COVE SPRINGS ROAD DRUMS	SHWS
FAIRVIEW ROAD DRUMS	SHWS
JOHN STODDARD - IVALEE DRUM	SHWS
ETOWAH COUNTY (RIDGEVILLE) LANDFILL	CERCLIS, FINDS
AUSTIN TRANSPORTATION	LUST
AIR DEPOT INDUSTRIAL PARK, BLDG T-81	LUST
MILLER'S GROCERY	UST
REECE CITY JET PEP #90	UST
ELLISON'S RURAL SERVICE STATION	UST
PAUL JORDAN CHEVRON	UST
BURSON HWY 431 N SERVICE STATION	UST
ETOWAH CO DISTRICT #4 SHOP	UST
C&P TRUCKING	UST
AUSTIN TRANSPORTATION	UST
OSBORN READY MIX INC	UST
BOYD HOOKS GROC	UST
DEVINE PURE (RAYMOND WHITE ROBYCO)	UST
STOP N SAVE #111 (JET PEP #59)	UST
PARTY SHOP	UST
BOYD HOOKS GROC	AST

OVERVIEW MAP - 2147001.2s

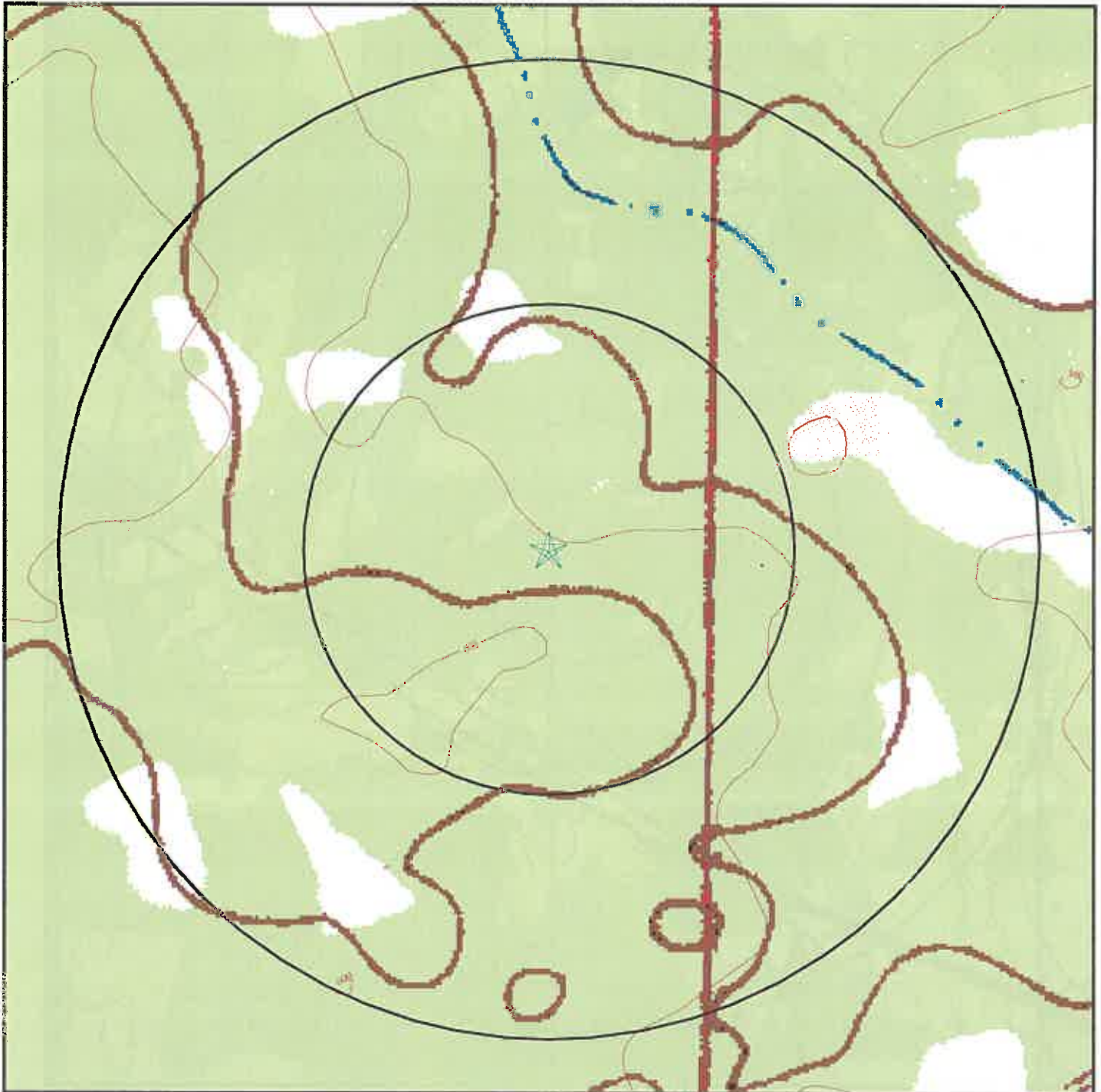


- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites
- Indian Reservations BIA
- County Boundary
- Oil & Gas pipelines
- Areas of Concern

SITE NAME: Proposed Little Canoe Creek Industrial Park ADDRESS: Canoe Creek Road North Gadsden AL 35954 LAT/LONG: 33.9580 / 86.1510	CLIENT: S&ME CONTACT: Bob Jackson INQUIRY #: 2147001.2s DATE: February 29, 2008 1:58 pm
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This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

DETAIL MAP - 2147001.2s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◊ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- Sensitive Receptors
- National Priority List Sites
- Dept. Defense Sites

- Indian Reservations BIA
- Oil & Gas pipelines

- Areas of Concern



This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

<p>SITE NAME: Proposed Little Canoe Creek Industrial Park ADDRESS: Canoe Creek Road North Gadsden AL 35954 LAT/LONG: 33.9580 / 86.1510</p>	<p>CLIENT: S&ME CONTACT: Bob Jackson INQUIRY #: 2147001.2s DATE: February 29, 2008 1:58 pm</p>
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MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<u>FEDERAL RECORDS</u>								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
NPL LIENS		TP	NR	NR	NR	NR	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		0.500	0	0	0	NR	NR	0
LIENS 2		TP	NR	NR	NR	NR	NR	0
CORRACTS		1.000	0	0	0	0	NR	0
RCRA-TSDF		0.500	0	0	0	NR	NR	0
RCRA-LQG		0.250	0	0	NR	NR	NR	0
RCRA-SQG		0.250	0	0	NR	NR	NR	0
RCRA-CESQG		0.250	0	0	NR	NR	NR	0
RCRA-NonGen		TP	NR	NR	NR	NR	NR	0
US ENG CONTROLS		0.500	0	0	0	NR	NR	0
US INST CONTROL		0.500	0	0	0	NR	NR	0
ERNS		TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
DOT OPS		TP	NR	NR	NR	NR	NR	0
US CDL		TP	NR	NR	NR	NR	NR	0
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
FUDS		1.000	0	0	0	0	NR	0
LUCIS		0.500	0	0	0	NR	NR	0
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
ODI		0.500	0	0	0	NR	NR	0
DEBRIS REGION 9		0.500	0	0	0	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
HIST FTTS		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
ICIS		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
RADINFO		TP	NR	NR	NR	NR	NR	0
FINDS		TP	NR	NR	NR	NR	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
<u>STATE AND LOCAL RECORDS</u>								
SHWS		1.000	0	0	0	0	NR	0
SWF/LF		0.500	0	0	0	NR	NR	0
SWRCY		0.500	0	0	0	NR	NR	0
LUST		0.500	0	0	0	NR	NR	0
AOCONCERN		1.000	0	0	0	0	NR	0

MAP FINDINGS SUMMARY

<u>Database</u>	<u>Target Property</u>	<u>Search Distance (Miles)</u>	<u>< 1/8</u>	<u>1/8 - 1/4</u>	<u>1/4 - 1/2</u>	<u>1/2 - 1</u>	<u>> 1</u>	<u>Total Plotted</u>
UST		0.250	0	0	NR	NR	NR	0
LAST		0.500	0	0	0	NR	NR	0
AST		0.250	0	0	NR	NR	NR	0
SPILLS		TP	NR	NR	NR	NR	NR	0
ENG CONTROLS		0.500	0	0	0	NR	NR	0
INST CONTROL		0.500	0	0	0	NR	NR	0
VCP		0.500	0	0	0	NR	NR	0
BROWNFIELDS		0.500	0	0	0	NR	NR	0
CDL		TP	NR	NR	NR	NR	NR	0
TIER 2		TP	NR	NR	NR	NR	NR	0
<u>TRIBAL RECORDS</u>								
INDIAN RESERV		1.000	0	0	0	0	NR	0
INDIAN ODI		0.500	0	0	0	NR	NR	0
INDIAN LUST		0.500	0	0	0	NR	NR	0
INDIAN UST		0.250	0	0	NR	NR	NR	0
<u>EDR PROPRIETARY RECORDS</u>								
Manufactured Gas Plants		1.000	0	0	0	0	NR	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Map ID
Direction
Distance
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number
EPA ID Number

NO SITES FOUND

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
ATTALLA	U003203804	MILLER'S GROCERY	RT 1 PO BOX 196	35954	UST
ATTALLA	U001715121	REECE CITY JET PEP #90	HWY 11 / 211 (NOCCALULA RD)	35954	UST
ATTALLA	U003204028	ELLISON'S RURAL SERVICE STATION	RT 3 @ DUCK SPRINGS	35954	UST
ATTALLA	U000763199	PAUL JORDAN CHEVRON	722 SOUTH 3RD STREET (HWY 11)	35954	UST
ATTALLA	U001719078	BURSON HWY 431 N SERVICE STATION	HWY 431 N	35954	UST
ATTALLA	U001860680	ETOWAH CO DISTRICT #4 SHOP	1950 HWY 431 N	35954	UST
ATTALLA	U000760670	C&P TRUCKING	HWY 77 N (N OF CLANTON ST)	35954	UST
ATTALLA	U001864926	AUSTIN TRANSPORTATION	HWY 77 (1 RODNEY AUSTIN DRIVE)	35954	UST
ATTALLA	U000004608	OSBORN READY MIX INC	2231 HWY 77	35954	UST
ATTALLA	S103237502	AUSTIN TRANSPORTATION	#1 BILLY AUSTIN DRIVE / HWY 77		IUST
ATTALLA	U003205034	BOYD HOOKS GROC	17 GALLANT RD (& HWY 278 & 431)	35954	UST
ATTALLA	A100270827	BOYD HOOKS GROC	17 GALLANT RD (& HWY 278 & 431)	35954	AST
ATTALLA	U000763187	DEVINE PURE (RAYMOND WHITE ROBYCO)	635 GILBERT FERRY RD (HWY 77)	35954	UST
ATTALLA	U003989318	STOP N SAVE #111 (JET PEP #59)	601 GILBERT FERRY RD & BURKE(HWY 77)	35954	UST
ATTALLA	U003933744	PARTY SHOP	9297 US HIGHWAY 11 N NEAR DEKALB CO	35954	UST
GADSDEN	S108114820	GADSDEN RIVERFRONT REDEVELOPMENT PROJEC	BROAD STREET / COOSA RIVER		VCP, SHWS
GADSDEN	S107495949	HUMANE SOCIETY DRUM SITE	BROOKS AVENUE		SHWS
GADSDEN	S108430725	WHITES CHAPEL DRUM SITE	BUS BARN ROAD		SHWS
GADSDEN	S103219131	COVE SPRINGS ROAD DRUMS	COUNTY SHOP / HWY 431		SHWS
GADSDEN	S103869868	FAIRVIEW ROAD DRUMS	ETOWAH AVENUE		SHWS
GADSDEN	S105175130	AIR DEPOT INDUSTRIAL PARK. BLDG T-81	RAINS AVE @ HOUSTON STREET. OFF 411		IUST
IVALEE	S103219123	JOHN STODDARD - IVALEE DRUM	ROCKY HOLLOW ROAD		SHWS
RIDGEVILLE	1000863479	ETOWAH COUNTY (RIDGEVILLE) LANDFILL	NOBLE HILL ROAD	35954	CERCLIS, FINDS

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

FEDERAL RECORDS

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 10/02/2007	Source: EPA
Date Data Arrived at EDR: 12/03/2007	Telephone: N/A
Date Made Active in Reports: 12/28/2007	Last EDR Contact: 01/28/2008
Number of Days to Update: 25	Next Scheduled EDR Contact: 04/28/2008
	Data Release Frequency: Quarterly

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 6
Telephone: 214-655-6659

EPA Region 3
Telephone 215-814-5418

EPA Region 7
Telephone: 913-551-7247

EPA Region 4
Telephone 404-562-8033

EPA Region 8
Telephone: 303-312-6774

EPA Region 5
Telephone 312-886-6686

EPA Region 9
Telephone: 415-947-4246

EPA Region 10
Telephone 206-553-8665

Proposed NPL: Proposed National Priority List Sites

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 10/02/2007	Source: EPA
Date Data Arrived at EDR: 12/03/2007	Telephone: N/A
Date Made Active in Reports: 12/28/2007	Last EDR Contact: 01/28/2008
Number of Days to Update: 25	Next Scheduled EDR Contact: 04/28/2008
	Data Release Frequency: Quarterly

DELISTED NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 10/02/2007	Source: EPA
Date Data Arrived at EDR: 12/03/2007	Telephone: N/A
Date Made Active in Reports: 12/28/2007	Last EDR Contact: 01/28/2008
Number of Days to Update: 25	Next Scheduled EDR Contact: 04/28/2008
	Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

NPL LIENS: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991	Source: EPA
Date Data Arrived at EDR: 02/02/1994	Telephone: 202-564-4267
Date Made Active in Reports: 03/30/1994	Last EDR Contact: 02/19/2008
Number of Days to Update: 56	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: No Update Planned

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 01/09/2008	Source: EPA
Date Data Arrived at EDR: 02/05/2008	Telephone: 703-412-9810
Date Made Active in Reports: 02/20/2008	Last EDR Contact: 02/05/2008
Number of Days to Update: 15	Next Scheduled EDR Contact: 03/17/2008
	Data Release Frequency: Quarterly

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Date of Government Version: 12/03/2007	Source: EPA
Date Data Arrived at EDR: 12/06/2007	Telephone: 703-412-9810
Date Made Active in Reports: 02/20/2008	Last EDR Contact: 12/06/2007
Number of Days to Update: 76	Next Scheduled EDR Contact: 03/17/2008
	Data Release Frequency: Quarterly

LIENS 2: CERCLA Lien Information

A Federal CERCLA ("Superfund") lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Date of Government Version: 12/09/2007	Source: Environmental Protection Agency
Date Data Arrived at EDR: 01/07/2008	Telephone: 202-564-6023
Date Made Active in Reports: 02/20/2008	Last EDR Contact: 02/15/2008
Number of Days to Update: 44	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Varies

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 12/12/2007	Source: EPA
Date Data Arrived at EDR: 12/18/2007	Telephone: 800-424-9346
Date Made Active in Reports: 02/20/2008	Last EDR Contact: 12/03/2007
Number of Days to Update: 64	Next Scheduled EDR Contact: 03/03/2008
	Data Release Frequency: Quarterly

RCRA-TSDF: RCRA - Transporters, Storage and Disposal

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/11/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 25

Source: Environmental Protection Agency
Telephone: (404) 562-8651
Last EDR Contact: 02/25/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Quarterly

RCRA-LQG: RCRA - Large Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 09/11/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 25

Source: Environmental Protection Agency
Telephone: (404) 562-8651
Last EDR Contact: 02/25/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Quarterly

RCRA-SQG: RCRA - Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 09/11/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 25

Source: Environmental Protection Agency
Telephone: (404) 562-8651
Last EDR Contact: 02/25/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Quarterly

RCRA-CESQG: RCRA - Conditionally Exempt Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 09/11/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 25

Source: Environmental Protection Agency
Telephone: (404) 562-8651
Last EDR Contact: 02/25/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Varies

RCRA-NonGen: RCRA - Non Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 09/11/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 25

Source: Environmental Protection Agency
Telephone: (404) 562-8651
Last EDR Contact: 02/25/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

US ENG CONTROLS: Engineering Controls Sites List

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 07/16/2007	Source: Environmental Protection Agency
Date Data Arrived at EDR: 08/03/2007	Telephone: 703-603-8905
Date Made Active in Reports: 10/11/2007	Last EDR Contact: 01/02/2008
Number of Days to Update: 69	Next Scheduled EDR Contact: 03/31/2008
	Data Release Frequency: Varies

US INST CONTROL: Sites with Institutional Controls

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 07/16/2007	Source: Environmental Protection Agency
Date Data Arrived at EDR: 08/03/2007	Telephone: 703-603-8905
Date Made Active in Reports: 10/11/2007	Last EDR Contact: 01/02/2008
Number of Days to Update: 69	Next Scheduled EDR Contact: 03/31/2008
	Data Release Frequency: Varies

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/31/2006	Source: National Response Center, United States Coast Guard
Date Data Arrived at EDR: 01/24/2007	Telephone: 202-267-2180
Date Made Active in Reports: 03/12/2007	Last EDR Contact: 01/23/2008
Number of Days to Update: 47	Next Scheduled EDR Contact: 04/21/2008
	Data Release Frequency: Annually

HMIRS: Hazardous Materials Information Reporting System

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 10/01/2007	Source: U.S. Department of Transportation
Date Data Arrived at EDR: 12/03/2007	Telephone: 202-366-4555
Date Made Active in Reports: 12/28/2007	Last EDR Contact: 01/17/2008
Number of Days to Update: 25	Next Scheduled EDR Contact: 04/14/2008
	Data Release Frequency: Annually

DOT OPS: Incident and Accident Data

Department of Transportation, Office of Pipeline Safety Incident and Accident data.

Date of Government Version: 11/14/2007	Source: Department of Transportation, Office of Pipeline Safety
Date Data Arrived at EDR: 11/29/2007	Telephone: 202-366-4595
Date Made Active in Reports: 02/20/2008	Last EDR Contact: 02/27/2008
Number of Days to Update: 83	Next Scheduled EDR Contact: 05/26/2008
	Data Release Frequency: Varies

CDL: Clandestine Drug Labs

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/01/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 25

Source: Drug Enforcement Administration
Telephone: 202-307-1000
Last EDR Contact: 12/28/2007
Next Scheduled EDR Contact: 03/24/2008
Data Release Frequency: Quarterly

US BROWNFIELDS: A Listing of Brownfields Sites

Included in the listing are brownfields properties addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. Targeted Brownfields Assessments-EPA's Targeted Brownfields Assessments (TBA) program is designed to help states, tribes, and municipalities—especially those without EPA Brownfields Assessment Demonstration Pilots—minimize the uncertainties of contamination often associated with brownfields. Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under EPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. Cooperative Agreement Recipients—States, political subdivisions, territories, and Indian tribes become Brownfields Cleanup Revolving Loan Fund (BCRLF) cooperative agreement recipients when they enter into BCRLF cooperative agreements with the U.S. EPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

Date of Government Version: 01/03/2008
Date Data Arrived at EDR: 01/17/2008
Date Made Active in Reports: 02/20/2008
Number of Days to Update: 34

Source: Environmental Protection Agency
Telephone: 202-566-2777
Last EDR Contact: 01/17/2008
Next Scheduled EDR Contact: 03/10/2008
Data Release Frequency: Semi-Annually

DOD: Department of Defense Sites

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 11/10/2006
Date Made Active in Reports: 01/11/2007
Number of Days to Update: 62

Source: USGS
Telephone: 703-692-8801
Last EDR Contact: 02/08/2008
Next Scheduled EDR Contact: 05/05/2008
Data Release Frequency: Semi-Annually

FUDS: Formerly Used Defense Sites

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/31/2006
Date Data Arrived at EDR: 08/31/2007
Date Made Active in Reports: 10/11/2007
Number of Days to Update: 41

Source: U.S. Army Corps of Engineers
Telephone: 202-528-4285
Last EDR Contact: 01/02/2008
Next Scheduled EDR Contact: 03/31/2008
Data Release Frequency: Varies

LUCIS: Land Use Control Information System

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 12/09/2005
Date Data Arrived at EDR: 12/11/2006
Date Made Active in Reports: 01/11/2007
Number of Days to Update: 31

Source: Department of the Navy
Telephone: 843-820-7326
Last EDR Contact: 12/10/2007
Next Scheduled EDR Contact: 03/10/2008
Data Release Frequency: Varies

CONSENT: Superfund (CERCLA) Consent Decrees

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/01/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 25

Source: Department of Justice, Consent Decree Library
Telephone: Varies
Last EDR Contact: 01/21/2008
Next Scheduled EDR Contact: 04/21/2008
Data Release Frequency: Varies

ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 01/14/2008
Date Data Arrived at EDR: 01/22/2008
Date Made Active in Reports: 01/30/2008
Number of Days to Update: 8

Source: EPA
Telephone: 703-416-0223
Last EDR Contact: 01/02/2008
Next Scheduled EDR Contact: 03/31/2008
Data Release Frequency: Annually

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 07/13/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 52

Source: Department of Energy
Telephone: 505-845-0011
Last EDR Contact: 12/17/2007
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: Varies

ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/1985
Date Data Arrived at EDR: 08/09/2004
Date Made Active in Reports: 09/17/2004
Number of Days to Update: 39

Source: Environmental Protection Agency
Telephone: 800-424-9346
Last EDR Contact: 06/09/2004
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

DEBRIS REGION 9: Torres Martinez Reservation Illegal Dump Site Locations

A listing of illegal dump sites location on the Torres Martinez Indian Reservation located in eastern Riverside County and northern Imperial County, California.

Date of Government Version: 12/28/2007
Date Data Arrived at EDR: 12/28/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 27

Source: EPA, Region 9
Telephone: 415-972-3336
Last EDR Contact: 12/26/2007
Next Scheduled EDR Contact: 03/24/2008
Data Release Frequency: Varies

MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 11/20/2007
Date Data Arrived at EDR: 01/03/2008
Date Made Active in Reports: 02/20/2008
Number of Days to Update: 48

Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959
Last EDR Contact: 01/03/2008
Next Scheduled EDR Contact: 03/24/2008
Data Release Frequency: Semi-Annually

TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 04/27/2007
Date Made Active in Reports: 07/05/2007
Number of Days to Update: 69

Source: EPA
Telephone: 202-566-0250
Last EDR Contact: 02/29/2008
Next Scheduled EDR Contact: 06/16/2008
Data Release Frequency: Annually

TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2002
Date Data Arrived at EDR: 04/14/2006
Date Made Active in Reports: 05/30/2006
Number of Days to Update: 46

Source: EPA
Telephone: 202-260-5521
Last EDR Contact: 01/28/2008
Next Scheduled EDR Contact: 04/14/2008
Data Release Frequency: Every 4 Years

FTTS: FIFRA/TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 01/15/2008
Date Data Arrived at EDR: 01/22/2008
Date Made Active in Reports: 01/30/2008
Number of Days to Update: 8

Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-566-1667
Last EDR Contact: 12/17/2007
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: Quarterly

FTTS INSP: FIFRA/TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 01/15/2008
Date Data Arrived at EDR: 01/22/2008
Date Made Active in Reports: 01/30/2008
Number of Days to Update: 8

Source: EPA
Telephone: 202-566-1667
Last EDR Contact: 12/17/2007
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: Quarterly

HIST FTTS: FIFRA/TSCA Tracking System Administrative Case Listing

A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2007
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

HIST FTTS INSP: FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing

A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2008
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 03/13/2007
Date Made Active in Reports: 04/27/2007
Number of Days to Update: 45

Source: EPA
Telephone: 202-564-4203
Last EDR Contact: 01/28/2008
Next Scheduled EDR Contact: 04/14/2008
Data Release Frequency: Annually

ICIS: Integrated Compliance Information System

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 07/27/2007
Date Data Arrived at EDR: 08/13/2007
Date Made Active in Reports: 10/11/2007
Number of Days to Update: 59

Source: Environmental Protection Agency
Telephone: 202-564-5088
Last EDR Contact: 01/15/2008
Next Scheduled EDR Contact: 04/14/2008
Data Release Frequency: Quarterly

PADS: PCB Activity Database System

PCB Activity Database. PADS identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 04/12/2007
Date Data Arrived at EDR: 06/08/2007
Date Made Active in Reports: 08/29/2007
Number of Days to Update: 82

Source: EPA
Telephone: 202-566-0500
Last EDR Contact: 02/07/2008
Next Scheduled EDR Contact: 05/05/2008
Data Release Frequency: Annually

MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/04/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 25

Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
Last EDR Contact: 01/02/2008
Next Scheduled EDR Contact: 03/31/2008
Data Release Frequency: Quarterly

RADINFO: Radiation Information Database

The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 10/30/2007
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 52

Source: Environmental Protection Agency
Telephone: 202-343-9775
Last EDR Contact: 01/31/2008
Next Scheduled EDR Contact: 04/28/2008
Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 01/04/2008	Source: EPA
Date Data Arrived at EDR: 01/10/2008	Telephone: (404) 562-9900
Date Made Active in Reports: 02/20/2008	Last EDR Contact: 01/02/2008
Number of Days to Update: 41	Next Scheduled EDR Contact: 03/31/2008
	Data Release Frequency: Quarterly

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995	Source: EPA
Date Data Arrived at EDR: 07/03/1995	Telephone: 202-564-4104
Date Made Active in Reports: 08/07/1995	Last EDR Contact: 12/03/2007
Number of Days to Update: 35	Next Scheduled EDR Contact: 03/03/2008
	Data Release Frequency: No Update Planned

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2005	Source: EPA/NTIS
Date Data Arrived at EDR: 03/06/2007	Telephone: 800-424-9346
Date Made Active in Reports: 04/13/2007	Last EDR Contact: 12/13/2007
Number of Days to Update: 38	Next Scheduled EDR Contact: 03/10/2008
	Data Release Frequency: Biennially

STATE AND LOCAL RECORDS

SHWS: Hazardous Substance Cleanup Fund

Hazardous substance sites, which pose a threat to public health and the environment, which will be cleaned up utilizing the Hazardous Substance Cleanup Fund.

Date of Government Version: 01/07/2008	Source: Department of Environmental Management
Date Data Arrived at EDR: 01/08/2008	Telephone: 334-271-7984
Date Made Active in Reports: 01/29/2008	Last EDR Contact: 01/07/2008
Number of Days to Update: 21	Next Scheduled EDR Contact: 04/07/2008
	Data Release Frequency: Semi-Annually

SWF/LF: Permitted Landfills

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 09/19/2007	Source: Department of Environmental Management
Date Data Arrived at EDR: 11/21/2007	Telephone: 334-271-7988
Date Made Active in Reports: 12/21/2007	Source: Department of Environmental Management, GIS Section
Number of Days to Update: 30	Telephone: 334-271-7700
	Last EDR Contact: 02/08/2008
	Next Scheduled EDR Contact: 05/05/2008
	Data Release Frequency: Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

SWRCY: Recycling/Recovered Materials Processors Directory

A listing of recycling facilities.

Date of Government Version: 09/01/2003
Date Data Arrived at EDR: 02/25/2005
Date Made Active in Reports: 03/28/2005
Number of Days to Update: 31

Source: Department of Economic & Community Affairs
Telephone: 334-242-5336
Last EDR Contact: 02/08/2008
Next Scheduled EDR Contact: 05/05/2008
Data Release Frequency: Varies

LUST: Leaking Underground Storage Tank Listing

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 12/06/2007
Date Data Arrived at EDR: 01/23/2008
Date Made Active in Reports: 01/29/2008
Number of Days to Update: 6

Source: Department of Environmental Management
Telephone: 334-270-5655
Last EDR Contact: 01/23/2008
Next Scheduled EDR Contact: 04/21/2008
Data Release Frequency: Quarterly

AOCONCERN: Area of Concern

Property boundary of the Redstone Arsenal facility.

Date of Government Version: 10/30/2006
Date Data Arrived at EDR: 04/10/2007
Date Made Active in Reports: 04/18/2007
Number of Days to Update: 8

Source: Department of the Army
Telephone: 256-313-3255
Last EDR Contact: 02/25/2008
Next Scheduled EDR Contact: 05/26/2008
Data Release Frequency: No Update Planned

UST: Underground Storage Tank information

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 12/10/2007
Date Data Arrived at EDR: 01/02/2008
Date Made Active in Reports: 02/07/2008
Number of Days to Update: 36

Source: Department of Environmental Management
Telephone: 334-270-5655
Last EDR Contact: 01/21/2008
Next Scheduled EDR Contact: 04/21/2008
Data Release Frequency: Quarterly

LAST: List of AST Release Incidents

A listing of aboveground storage tank releases that have been reported to ADEM. These are primarily smaller retail ASTs and smaller bulk plant ASTs.

Date of Government Version: 12/06/2007
Date Data Arrived at EDR: 12/07/2007
Date Made Active in Reports: 12/21/2007
Number of Days to Update: 14

Source: Department of Environmental Management
Telephone: 334-271-7712
Last EDR Contact: 01/21/2008
Next Scheduled EDR Contact: 04/21/2008
Data Release Frequency: Varies

AST: Aboveground Storage Tank Sites

Aboveground storage tank locations.

Date of Government Version: 12/10/2007
Date Data Arrived at EDR: 01/02/2008
Date Made Active in Reports: 02/08/2008
Number of Days to Update: 37

Source: Department of Environmental Management
Telephone: 334-271-7926
Last EDR Contact: 01/21/2008
Next Scheduled EDR Contact: 04/21/2008
Data Release Frequency: Quarterly

SPILLS: Emergency Response Data

Incidents involving spills of oil and hazardous materials.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 11/16/2007
Date Data Arrived at EDR: 11/16/2007
Date Made Active in Reports: 12/21/2007
Number of Days to Update: 35

Source: Department of Environmental Management
Telephone: 334-394-4382
Last EDR Contact: 01/21/2008
Next Scheduled EDR Contact: 04/21/2008
Data Release Frequency: Varies

ENG CONTROLS: Engineering Controls Site Listing

A listing of sites with engineering controls included in the Land Division Cleanup Program Inventory listing.

Date of Government Version: 11/29/2007
Date Data Arrived at EDR: 01/11/2008
Date Made Active in Reports: 01/29/2008
Number of Days to Update: 18

Source: Department of Environmental Management
Telephone: 334-271-7735
Last EDR Contact: 01/07/2008
Next Scheduled EDR Contact: 04/07/2008
Data Release Frequency: Varies

INST CONTROL: Land Division Brownfields 128(a) Program Site Listing

Institutional Controls (ICs) are non-engineered instruments, such as administrative and/or legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of a remedy by limiting land or resource use. There are five different types of controls. These are governmental, proprietary, enforcement tools with IC components, informational devices and unrestricted. Unrestricted- No institutional controls (unrestricted for industrial and residential use). Governmental- controls implemented and enforced by state and local governments. (zoning restrictions, ordinances, building permits, etc.). Proprietary- controls which have their basis in real property law (easements, covenants). Enforcement and Permit Tools with IC components- these controls are issued to compel land owners to limit certain site activities on both federal and private sites. Informational devices- informational tools with provide information or notification that residual or capped contamination may remain on site (deed or hazard notices).

Date of Government Version: 11/29/2007
Date Data Arrived at EDR: 01/11/2008
Date Made Active in Reports: 01/29/2008
Number of Days to Update: 18

Source: Department of Environmental Management
Telephone: 334-271-7735
Last EDR Contact: 01/07/2008
Next Scheduled EDR Contact: 04/07/2008
Data Release Frequency: Varies

VCP: Cleanup Program Inventory

Currently the Cleanup Inventory List contains information about sites undergoing assessment and possible cleanup under Alabama's Brownfield Redevelopment and Voluntary Cleanup Program. It also includes sites that have exited the program but were remediated to less than unrestricted levels.

Date of Government Version: 11/29/2007
Date Data Arrived at EDR: 01/11/2008
Date Made Active in Reports: 01/29/2008
Number of Days to Update: 18

Source: Department of Environmental Management
Telephone: 334-271-7700
Last EDR Contact: 01/07/2008
Next Scheduled EDR Contact: 04/07/2008
Data Release Frequency: Semi-Annually

BROWNFIELDS: Land Division Brownfields 128(a) Program Site Listing

A listing of Brownfields activities performed by ADEM.

Date of Government Version: 07/27/2007
Date Data Arrived at EDR: 10/11/2007
Date Made Active in Reports: 10/19/2007
Number of Days to Update: 8

Source: Department of Environmental Management
Telephone: 334-271-7735
Last EDR Contact: 01/11/2008
Next Scheduled EDR Contact: 04/07/2008
Data Release Frequency: Varies

CDL: Clandestine Methamphetamine Lab Sites

Clandestine methamphetamine lab locations seized by law enforcement agencies.

Date of Government Version: 02/14/2005
Date Data Arrived at EDR: 02/18/2005
Date Made Active in Reports: 04/01/2005
Number of Days to Update: 42

Source: Department of Environmental Management.
Telephone: 334-271-7700
Last EDR Contact: 02/11/2008
Next Scheduled EDR Contact: 05/12/2008
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

TIER 2: Tier 2 Data Listing

A listing of facilities which store or manufacture hazardous materials and submit a chemical inventory report.

Date of Government Version: 06/04/2007
Date Data Arrived at EDR: 07/10/2007
Date Made Active in Reports: 09/04/2007
Number of Days to Update: 56

Source: Department of Environmental Management
Telephone: 334-260-2714
Last EDR Contact: 01/07/2008
Next Scheduled EDR Contact: 04/07/2008
Data Release Frequency: Varies

TRIBAL RECORDS

INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 12/08/2006
Date Made Active in Reports: 01/11/2007
Number of Days to Update: 34

Source: USGS
Telephone: 202-208-3710
Last EDR Contact: 02/08/2008
Next Scheduled EDR Contact: 05/05/2008
Data Release Frequency: Semi-Annually

INDIAN ODI: Report on the Status of Open Dumps on Indian Lands

Location of open dumps on Indian land.

Date of Government Version: 12/31/1998
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 52

Source: Environmental Protection Agency
Telephone: 703-308-8245
Last EDR Contact: 02/25/2008
Next Scheduled EDR Contact: 05/26/2008
Data Release Frequency: Varies

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 12/03/2007
Date Data Arrived at EDR: 12/06/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 22

Source: EPA Region 8
Telephone: 303-312-6274
Last EDR Contact: 02/15/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Quarterly

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 06/01/2007
Date Data Arrived at EDR: 06/14/2007
Date Made Active in Reports: 07/05/2007
Number of Days to Update: 21

Source: EPA Region 7
Telephone: 913-551-7003
Last EDR Contact: 02/15/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Varies

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 12/12/2007
Date Data Arrived at EDR: 12/12/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 43

Source: EPA Region 6
Telephone: 214-665-6597
Last EDR Contact: 02/15/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Varies

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 11/30/2007
Date Data Arrived at EDR: 11/30/2007
Date Made Active in Reports: 12/28/2007
Number of Days to Update: 28

Source: Environmental Protection Agency
Telephone: 415-972-3372
Last EDR Contact: 02/15/2008
Next Scheduled EDR Contact: 05/19/2008
Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land

A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 12/01/2006	Source: EPA Region 1
Date Data Arrived at EDR: 12/01/2006	Telephone: 617-918-1313
Date Made Active in Reports: 01/29/2007	Last EDR Contact: 02/15/2008
Number of Days to Update: 59	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Varies

INDIAN LUST R4: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Florida, Mississippi and North Carolina.

Date of Government Version: 09/05/2007	Source: EPA Region 4
Date Data Arrived at EDR: 10/02/2007	Telephone: 404-562-8677
Date Made Active in Reports: 10/11/2007	Last EDR Contact: 02/15/2008
Number of Days to Update: 9	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Semi-Annually

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 11/27/2007	Source: EPA Region 10
Date Data Arrived at EDR: 12/03/2007	Telephone: 206-553-2857
Date Made Active in Reports: 01/24/2008	Last EDR Contact: 02/15/2008
Number of Days to Update: 52	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Quarterly

INDIAN UST R4: Underground Storage Tanks on Indian Land

No description is available for this data

Date of Government Version: 09/05/2007	Source: EPA Region 4
Date Data Arrived at EDR: 10/02/2007	Telephone: 404-562-9424
Date Made Active in Reports: 10/11/2007	Last EDR Contact: 02/15/2008
Number of Days to Update: 9	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Semi-Annually

INDIAN UST R5: Underground Storage Tanks on Indian Land

No description is available for this data

Date of Government Version: 12/21/2007	Source: EPA Region 5
Date Data Arrived at EDR: 12/21/2007	Telephone: 312-886-6136
Date Made Active in Reports: 01/24/2008	Last EDR Contact: 02/15/2008
Number of Days to Update: 34	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Varies

INDIAN UST R8: Underground Storage Tanks on Indian Land

No description is available for this data

Date of Government Version: 12/03/2007	Source: EPA Region 8
Date Data Arrived at EDR: 12/06/2007	Telephone: 303-312-6137
Date Made Active in Reports: 01/24/2008	Last EDR Contact: 02/15/2008
Number of Days to Update: 49	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Quarterly

INDIAN UST R10: Underground Storage Tanks on Indian Land

No description is available for this data

Date of Government Version: 11/27/2007	Source: EPA Region 10
Date Data Arrived at EDR: 12/03/2007	Telephone: 206-553-2857
Date Made Active in Reports: 01/24/2008	Last EDR Contact: 02/15/2008
Number of Days to Update: 52	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN UST R1: Underground Storage Tanks on Indian Land

A listing of underground storage tank locations on Indian Land.

Date of Government Version: 12/01/2006	Source: EPA, Region 1
Date Data Arrived at EDR: 12/01/2006	Telephone: 617-918-1313
Date Made Active in Reports: 01/29/2007	Last EDR Contact: 02/15/2008
Number of Days to Update: 59	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Varies

INDIAN UST R6: Underground Storage Tanks on Indian Land

No description is available for this data

Date of Government Version: 12/12/2007	Source: EPA Region 6
Date Data Arrived at EDR: 12/12/2007	Telephone: 214-665-7591
Date Made Active in Reports: 01/24/2008	Last EDR Contact: 02/15/2008
Number of Days to Update: 43	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Semi-Annually

INDIAN UST R9: Underground Storage Tanks on Indian Land

No description is available for this data

Date of Government Version: 11/30/2007	Source: EPA Region 9
Date Data Arrived at EDR: 12/03/2007	Telephone: 415-972-3368
Date Made Active in Reports: 01/24/2008	Last EDR Contact: 02/15/2008
Number of Days to Update: 52	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Quarterly

INDIAN UST R7: Underground Storage Tanks on Indian Land

No description is available for this data

Date of Government Version: 06/01/2007	Source: EPA Region 7
Date Data Arrived at EDR: 06/14/2007	Telephone: 913-551-7003
Date Made Active in Reports: 07/05/2007	Last EDR Contact: 02/15/2008
Number of Days to Update: 21	Next Scheduled EDR Contact: 05/19/2008
	Data Release Frequency: Varies

EDR PROPRIETARY RECORDS

Manufactured Gas Plants: EDR Proprietary Manufactured Gas Plants

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A	Source: EDR, Inc.
Date Data Arrived at EDR: N/A	Telephone: N/A
Date Made Active in Reports: N/A	Last EDR Contact: N/A
Number of Days to Update: N/A	Next Scheduled EDR Contact: N/A
	Data Release Frequency: No Update Planned

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

CT MANIFEST: Hazardous Waste Manifest Data

Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a tsd facility.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 06/15/2007
Date Made Active in Reports: 08/20/2007
Number of Days to Update: 66

Source: Department of Environmental Protection
Telephone: 860-424-3375
Last EDR Contact: 12/13/2007
Next Scheduled EDR Contact: 03/10/2008
Data Release Frequency: Annually

NJ MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 09/30/2007
Date Data Arrived at EDR: 12/04/2007
Date Made Active in Reports: 12/31/2007
Number of Days to Update: 27

Source: Department of Environmental Protection
Telephone: N/A
Last EDR Contact: 01/03/2008
Next Scheduled EDR Contact: 03/31/2008
Data Release Frequency: Annually

NY MANIFEST: Facility and Manifest Data

Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

Date of Government Version: 11/26/2007
Date Data Arrived at EDR: 11/29/2007
Date Made Active in Reports: 02/05/2008
Number of Days to Update: 68

Source: Department of Environmental Conservation
Telephone: 518-402-8651
Last EDR Contact: 02/28/2008
Next Scheduled EDR Contact: 05/26/2008
Data Release Frequency: Annually

PA MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2006
Date Data Arrived at EDR: 12/21/2007
Date Made Active in Reports: 01/10/2008
Number of Days to Update: 20

Source: Department of Environmental Protection
Telephone: N/A
Last EDR Contact: 12/10/2007
Next Scheduled EDR Contact: 09/10/2007
Data Release Frequency: Annually

RI MANIFEST: Manifest information

Hazardous waste manifest information

Date of Government Version: 10/01/2007
Date Data Arrived at EDR: 11/09/2007
Date Made Active in Reports: 01/15/2008
Number of Days to Update: 67

Source: Department of Environmental Management
Telephone: 401-222-2797
Last EDR Contact: 12/17/2007
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: Annually

WI MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2006
Date Data Arrived at EDR: 04/27/2007
Date Made Active in Reports: 06/08/2007
Number of Days to Update: 42

Source: Department of Natural Resources
Telephone: N/A
Last EDR Contact: 01/07/2008
Next Scheduled EDR Contact: 04/07/2008
Data Release Frequency: Annually

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data

Source: PennWell Corporation
Telephone: (800) 823-6277

This map includes information copyrighted by PennWell Corporation. This information is provided on a best effort basis and PennWell Corporation does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of PennWell.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.
Telephone: 312-280-5991

The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services
Telephone: 410-786-3000

A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes

Source: National Institutes of Health
Telephone: 301-594-6248

Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools

Source: National Center for Education Statistics
Telephone: 202-502-7300

The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools

Source: National Center for Education Statistics
Telephone: 202-502-7300

The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: Licensed Centers

Source: Department of Human Resources
Telephone: 334-242-1425

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 and 2005 from the U.S. Fish and Wildlife Service.

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

STREET AND ADDRESS INFORMATION

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GEOCHECK® - PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

PROPOSED LITTLE CANOE CREEK INDUSTRIAL PARK
CANOE CREEK ROAD NORTH
GADSDEN, AL 35954

TARGET PROPERTY COORDINATES

Latitude (North):	33.95796 - 33° 57' 28.6"
Longitude (West):	86.15103 - 86° 9' 3.7"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	578442.0
UTM Y (Meters):	3757625.0
Elevation:	582 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map:	33086-H2 STEELE, AL
Most Recent Revision:	1972

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

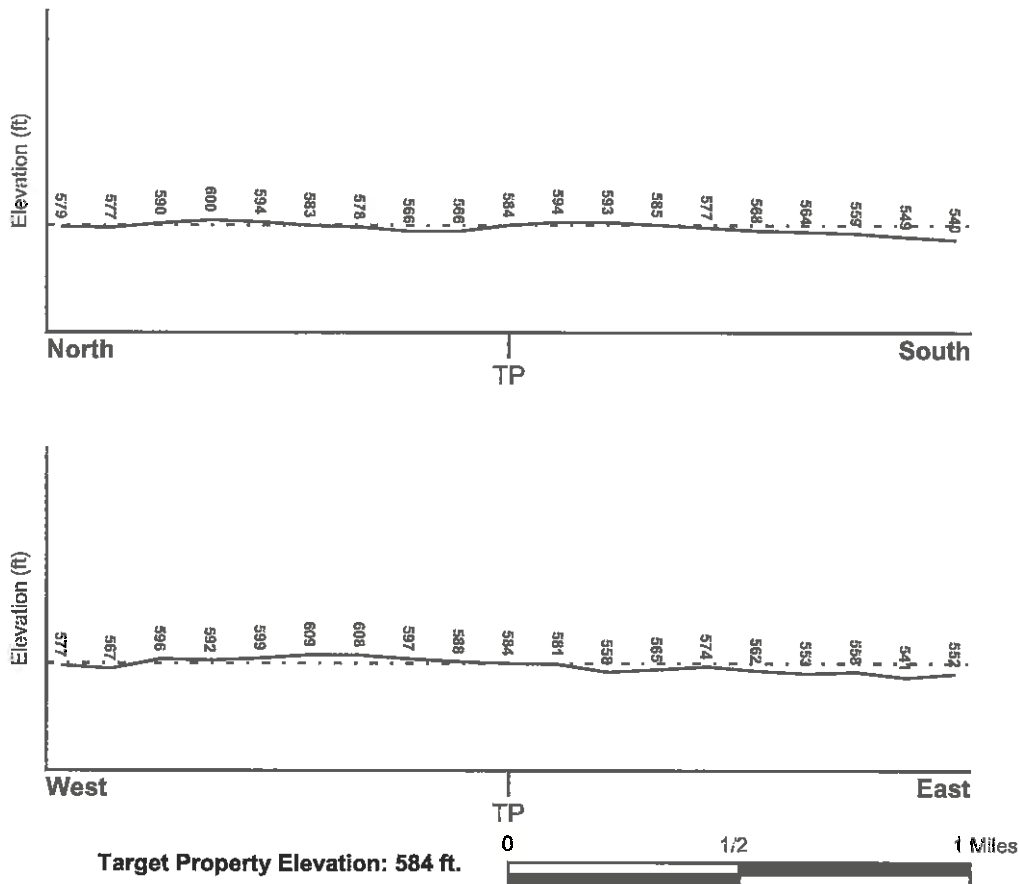
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General ENE

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5 Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

<u>Target Property County</u> ETOWAH, AL	<u>FEMA Flood Electronic Data</u> Not Available
Flood Plain Panel at Target Property:	Not Reported
Additional Panels in search area:	Not Reported

NATIONAL WETLAND INVENTORY

<u>NWI Quad at Target Property</u> STEELE	<u>NWI Electronic Data Coverage</u> Not Available
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HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

<u>MAP ID</u>	<u>LOCATION FROM TP</u>	<u>GENERAL DIRECTION GROUNDWATER FLOW</u>
Not Reported		

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

Era: Paleozoic
System: Cambrian
Series: Cambrian
Code: C (decoded above as Era, System & Series)

GEOLOGIC AGE IDENTIFICATION

Category: Stratified Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name: CONASAUGA
Soil Surface Texture: silt loam
Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.
Soil Drainage Class: Moderately well drained. Soils have a layer of low hydraulic conductivity, wet state high in the profile. Depth to water table is 3 to 6 feet.

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: HIGH

Depth to Bedrock Min: > 20 inches

Depth to Bedrock Max: > 40 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Permeability Rate (in/hr)	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	4 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay. FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 2.00 Min: 0.60	Max: 6.00 Min: 3.60
2	4 inches	10 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay. FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 0.20 Min: 0.06	Max: 6.00 Min: 3.60
3	10 inches	19 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 0.20 Min: 0.06	Max: 6.00 Min: 3.60
4	19 inches	30 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 0.20 Min: 0.06	Max: 6.50 Min: 3.60
5	30 inches	60 inches	weathered bedrock	Not reported	Not reported	Max: 0.20 Min: 0.00	Max: 0.00 Min: 0.00

OTHER SOIL TYPES IN AREA

Based on Soil Conservation Service STATSGO data, the following additional subordinant soil types may appear within the general area of target property.

Soil Surface Textures: channery - silt loam
silty clay loam
gravelly - sandy loam
loam
sandy loam
unweathered bedrock

Surficial Soil Types: channery - silt loam
silty clay loam
gravelly - sandy loam
loam
sandy loam

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

unweathered bedrock

Shallow Soil Types: silty clay loam
 clay
 gravelly - loam
 loam

Deeper Soil Types: silty clay
 gravelly - clay loam
 stratified
 unweathered bedrock

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

<u>DATABASE</u>	<u>SEARCH DISTANCE (miles)</u>
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

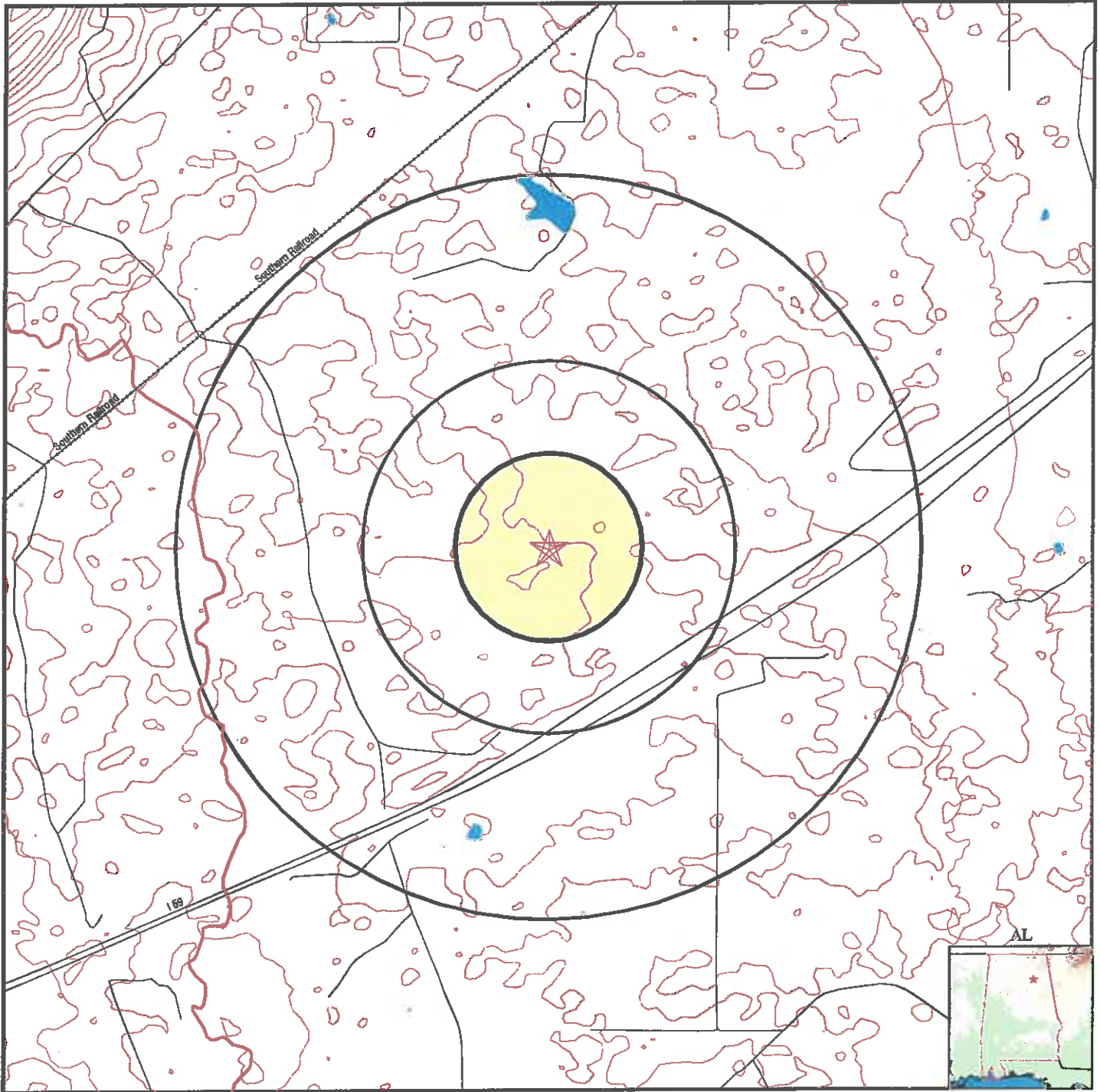
<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No PWS System Found		

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

PHYSICAL SETTING SOURCE MAP - 2147001.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons

- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location

SITE NAME: Proposed Little Canoe Creek Industrial Park
ADDRESS: Canoe Creek Road North
 Gadsden AL 35954
LAT/LONG: 33.9580 / 86.1510

CLIENT: S&ME
CONTACT: Bob Jackson
INQUIRY #: 2147001.2s
DATE: February 29, 2008 1:58 pm

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

State Database: AL Radon

Radon Test Results

County	Zip	City	Total Sites	< 4 pCi/L	>=4 pCi/L	% of sites >=4 pCi/L
DEKALB	35954	ATTALLA	23	22	1	4.35
ETOWAH	35954	ATTALLA	23	22	1	4.35

Federal EPA Radon Zone for ETOWAH County: 2

Note: Zone 1 indoor average level > 4 pCi/L.
 : Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
 : Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for Zip Code: 35954

Number of sites tested: 1

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	Not Reported	Not Reported	Not Reported	Not Reported
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	3.100 pCi/L	100%	0%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)

Source: United States Geologic Survey

EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

HYDROLOGIC INFORMATION

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 and 2005 from the U.S. Fish and Wildlife Service.

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System

Source: EDR proprietary database of groundwater flow information

EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit

Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Services

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Services (NRCS)

Telephone: 800-672-5559

SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Services, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Public Water System: data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)

This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

OTHER STATE DATABASE INFORMATION

RADON

State Database: AL Radon

Source: Department of Public Health

Telephone: 334-206-5391

Short-Term Test Results for Alabama Counties

Area Radon Information

Source: USGS

Telephone: 703-356-4020

The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones

Source: EPA

Telephone: 703-356-4020

Sections 307 & 309 of IRRA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities

Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration

STREET AND ADDRESS INFORMATION

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APPENDIX C
HISTORICAL INFORMATION



EDR® Environmental
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The EDR Aerial Photo Decade Package

**Proposed Little Canoe Creek Industrial
Canoe Creek Road North
Gadsden, AL 35954**

Inquiry Number: 2147001.5

February 29, 2008

The Standard in Environmental Risk Information

**440 Wheelers Farms Road
Milford, Connecticut 06461**

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Date EDR Searched Historical Sources:

Aerial Photography February 29, 2008

Target Property:

Canoe Creek Road North

Gadsden, AL 35954

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
1972	Aerial Photograph. Scale: 1"=750'	Panel #: 2433086-H2/Flight Date: January 08, 1972	EDR
1988	Aerial Photograph. Scale: 1"=1000'	Panel #: 2433086-H2/Flight Date: May 26, 1988	EDR
1997	Aerial Photograph. Scale: 1"=750'	Panel #: 2433086-H2/Flight Date: March 07, 1997	EDR



INQUIRY #: 2147001.5

YEAR: 1972

 = 750'



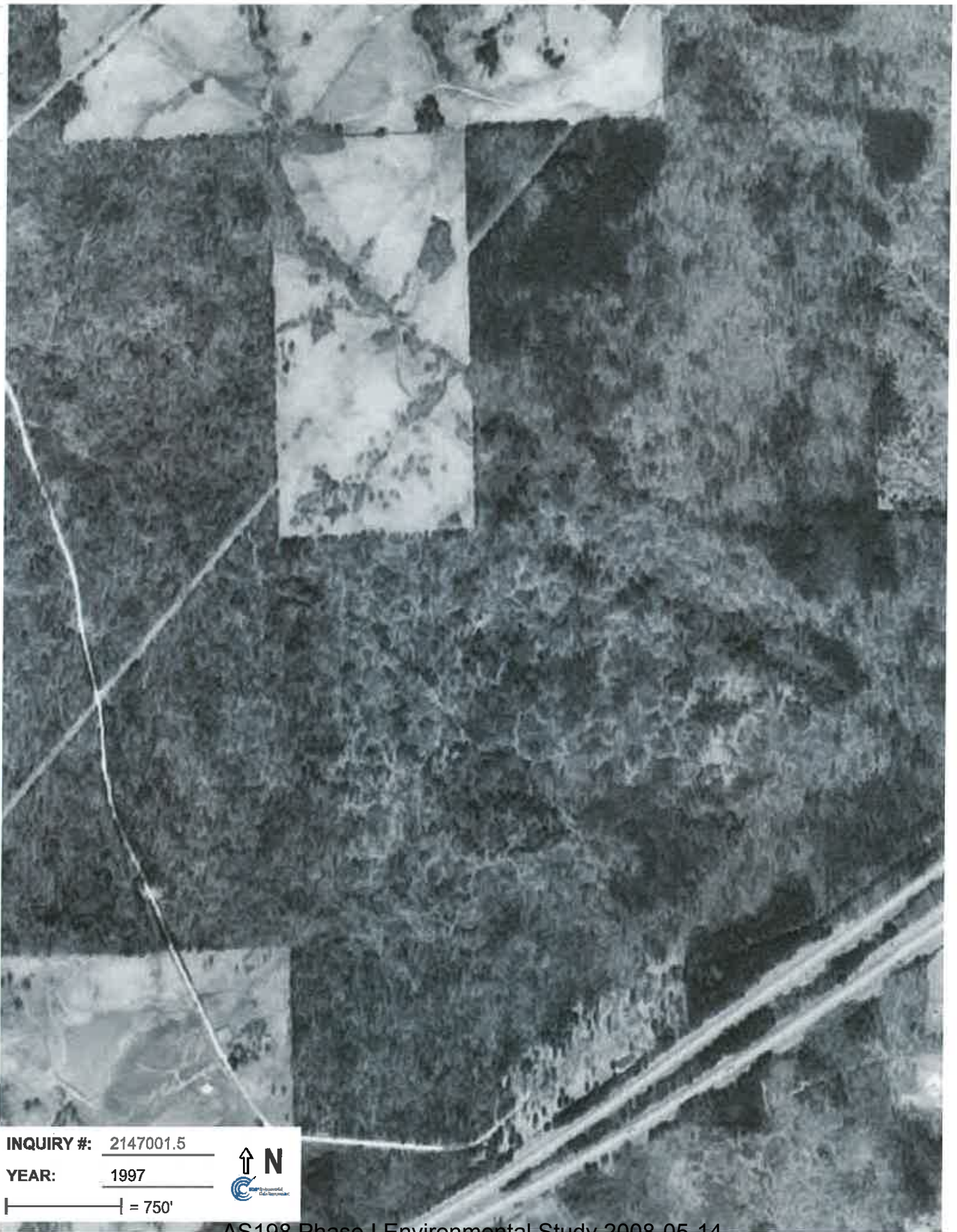


INQUIRY #: 2147001.5

YEAR: 1988

| = 1000'





INQUIRY #: 2147001.5

YEAR: 1997

| = 750'





EDR Environmental
Data Resources Inc

The EDR-City Directory
Abstract

**Proposed Little Canoe Creek Industrial
Park**
Canoe Creek Road North
Gadsden, AL 35954
Inquiry Number: 2147001.6

Thursday, February 28, 2008

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SUMMARY

- ***City Directories:***

Business directories including city, cross reference and telephone directories were reviewed, if available, at approximately five year intervals for the years spanning 1962 through 2006. (These years are not necessarily inclusive.) A summary of the information obtained is provided in the text of this report.

Date EDR Searched Historical Sources: February 28, 2008

Target Property:
Canoe Creek Road North
Gadsden, AL 35954

<u>Year</u>	<u>Uses</u>	<u>Source</u>
1962	Street Not Listed in Research Source	Polk's City Directory
1971	Street Not Listed In Research Source	Polk's City Directory
1981	Street Not Listed in Research Source	Polk's City Directory
1992	Street Not Listed in Research Source	Polk's City Directory
2001	Address Not Listed in Research Source	Polk's City Directory
2006	Address Not Listed in Research Source	Polk's City Directory

Adjoining Properties

SURROUNDING

Multiple Addresses
Gadsden, AL 35954

<u>Year</u>	<u>Uses</u>	<u>Source</u>
1962	Street Not Listed in Research Source	Polk's City Directory
1971	Street Not Listed in Research Source	Polk's City Directory
1981	Street Not Listed in Research Source	Polk's City Directory
1992	Street Not Listed in Research Source	Polk's City Directory
2001	*Canoe Creek Rd N*	Polk's City Directory
	Not Verified (1765)	Polk's City Directory
	Residence (1873)	Polk's City Directory
	Address not listed in research source (1875)	Polk's City Directory
	No other addresses in range 1700 - 1999 Canoe Creek Rd N	Polk's City Directory
2006	*Canoe Creek Rd N*	Polk's City Directory
	Residence (1765)	Polk's City Directory
	Address not listed in research source (1875)	Polk's City Directory

2147001-6

2

<u>Year</u>	<u>Uses</u>	<u>Source</u>
2006	No other addresses in range 1700 - 1999 Canoe Creek Rd N	Poik's City Directory

2147001-6

3



EDR® Environmental
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EDR Historical Topographic Map Report

**Proposed Little Canoe Creek Industrial
Park**

**Canoe Creek Road North
Gadsden, AL 35954**

Inquiry Number: 2147001.4

February 19, 2008

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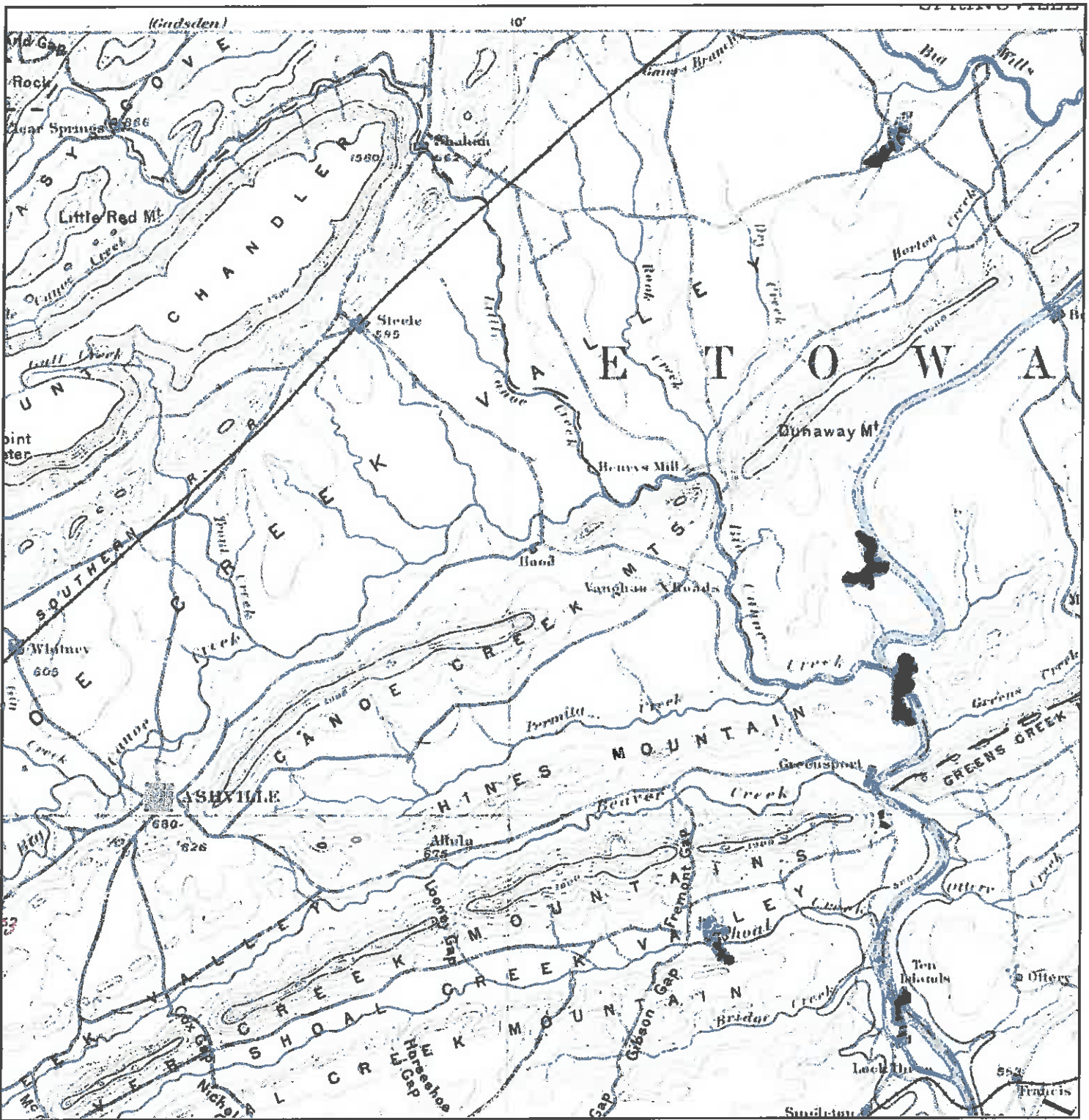
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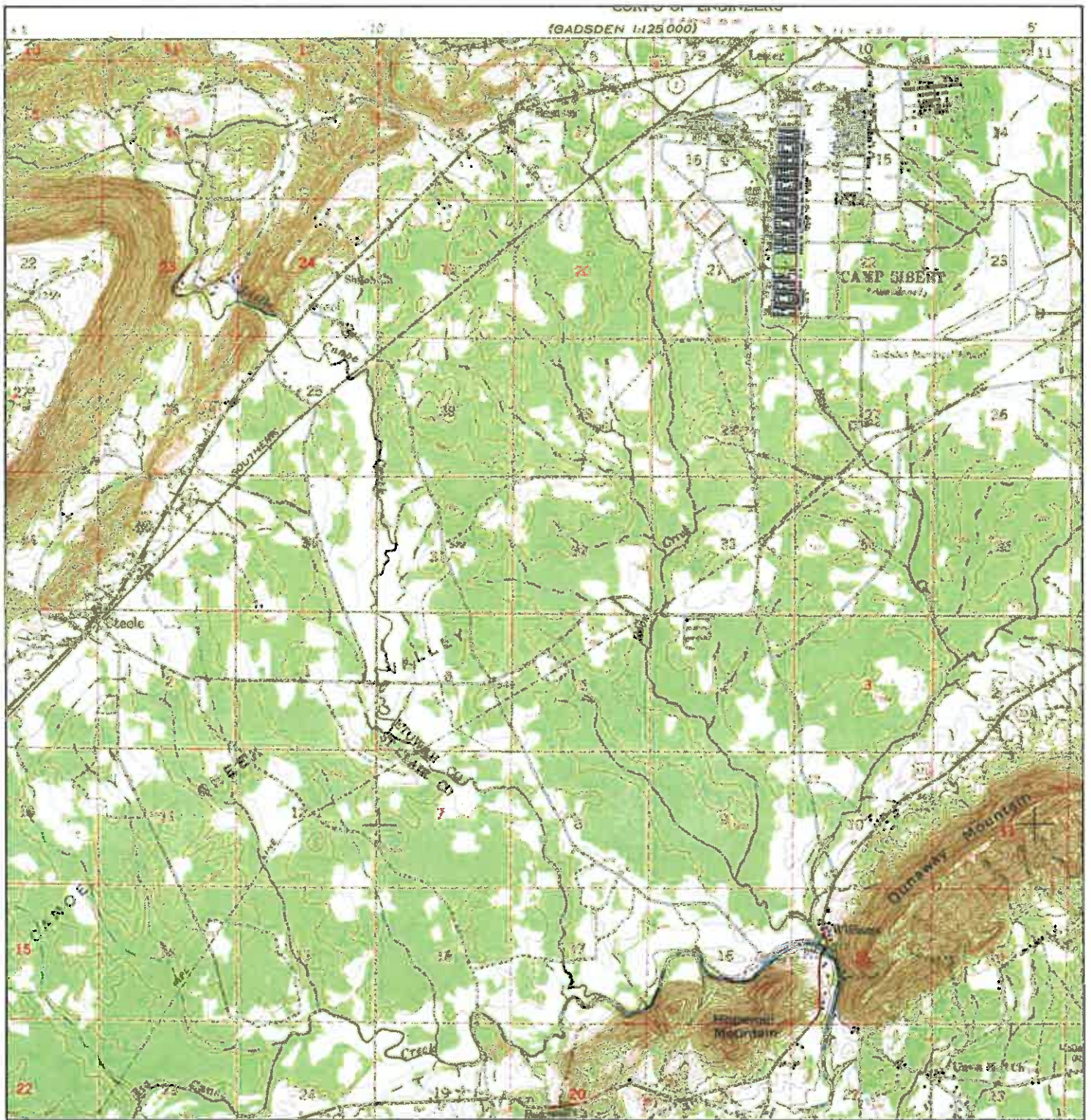
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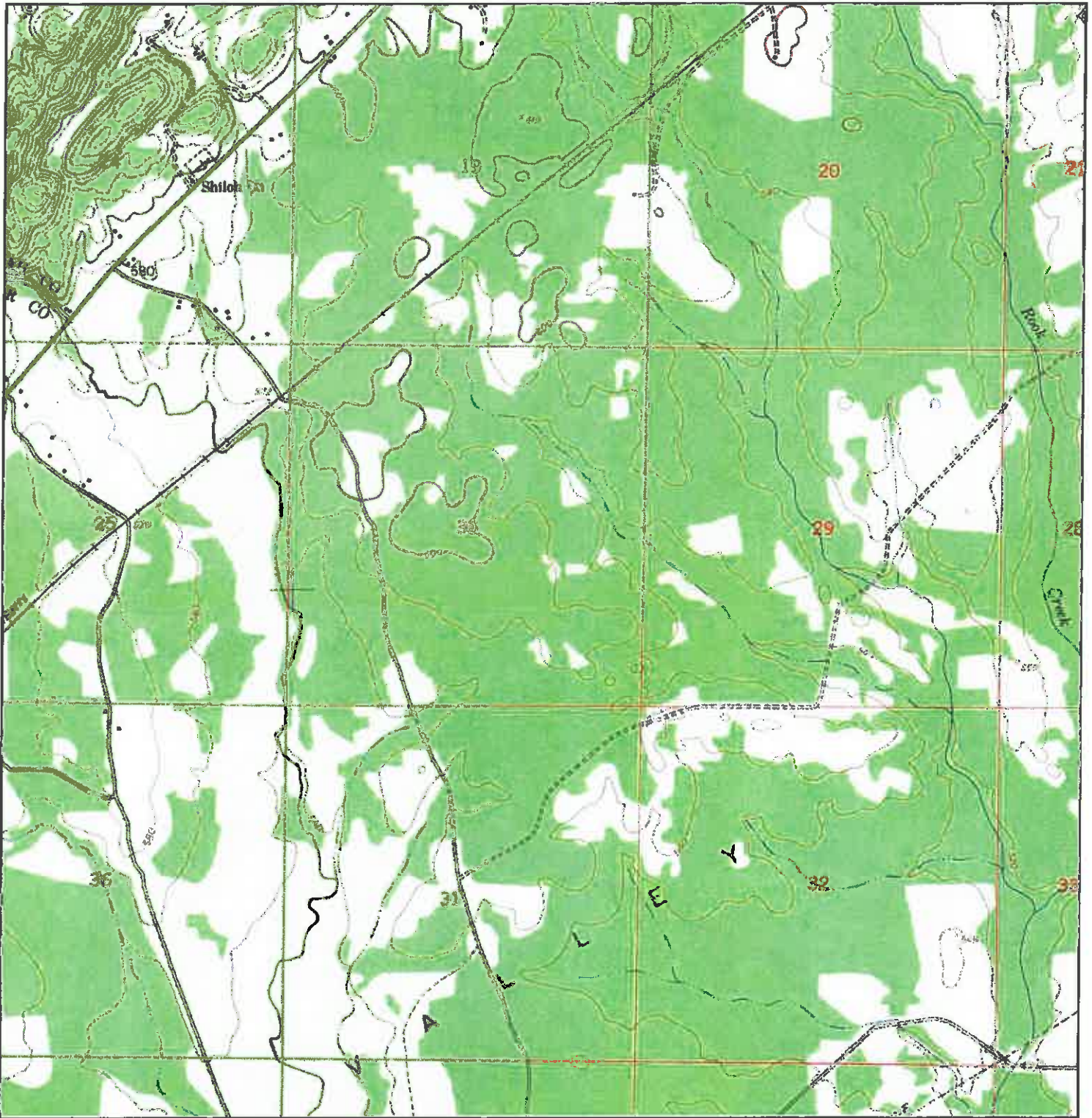
N 	TARGET QUAD NAME: SPRINGVILLE MAP YEAR: 1892	SITE NAME: Proposed Little Canoe Creek Industrial Park ADDRESS: Canoe Creek Road North Gadsden, AL 35954 LAT/LONG: 33.958 / 86.151	CLIENT: S&ME CONTACT: Bob Jackson INQUIRY#: 2147001.4 RESEARCH DATE: 02/19/2008
	SERIES: 30 SCALE: 1:125000		

Historical Topographic Map



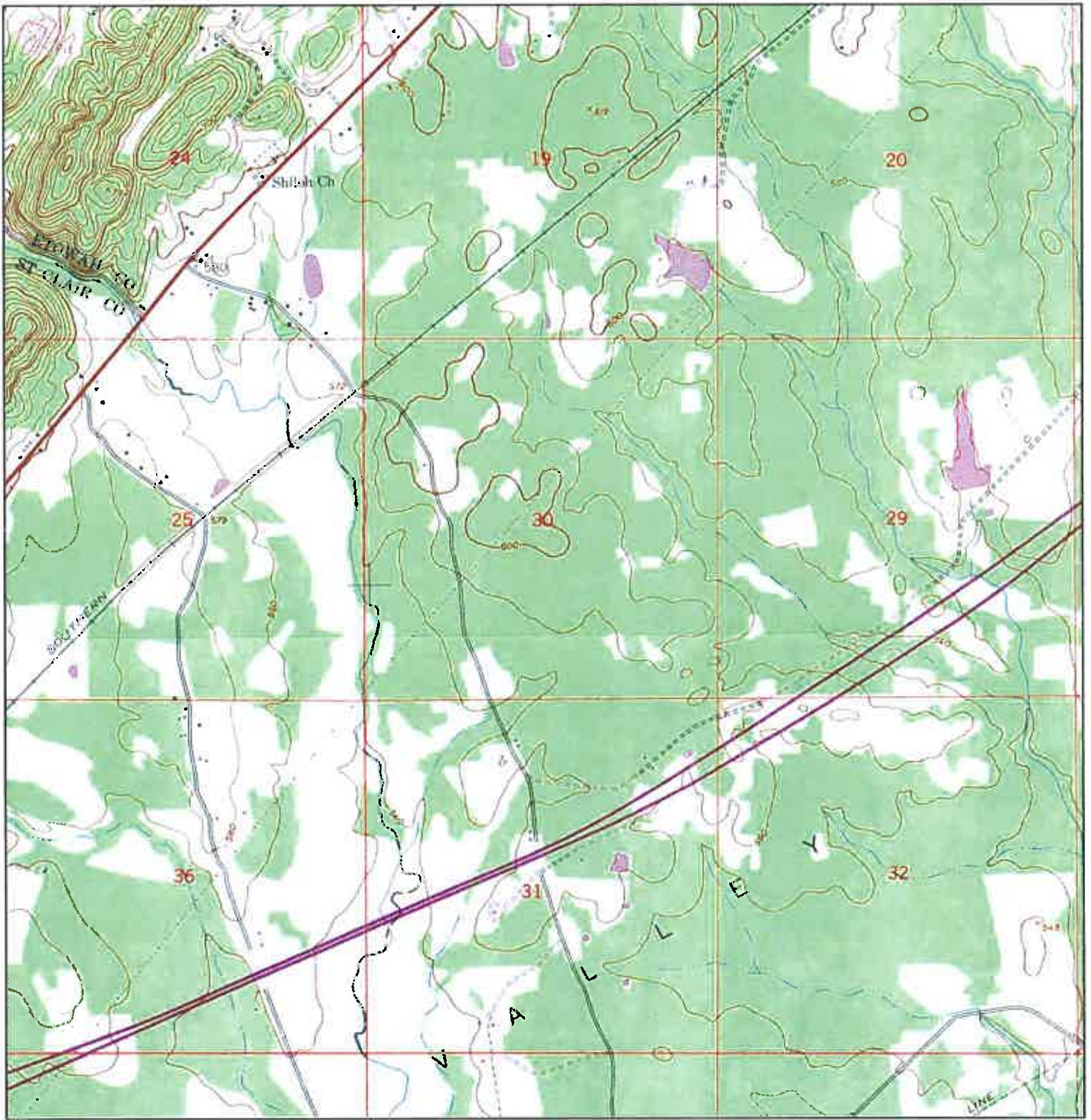
<p>N ↑</p>	<p>TARGET QUAD NAME: STEELE MAP YEAR: 1947</p>	<p>SITE NAME: Proposed Life Canoe Creek Industrial Park ADDRESS: Canoe Creek Road North Gadsden, AL 35954 LAT/LONG: 33.958 / 86.151</p>	<p>CLIENT: S&ME CONTACT: Bob Jackson INQUIRY#: 2147001.4 RESEARCH DATE: 02/19/2008</p>
	<p>SERIES: 15 SCALE: 1:62500</p>		

Historical Topographic Map



	TARGET QUAD	SITE NAME: Proposed Little Canoe Creek Industrial Park	CLIENT: S&ME
	NAME: STEELE		CONTACT: Bob Jackson
	MAP YEAR: 1947	ADDRESS: Canoe Creek Road North Gadsden, AL 35954	INQUIRY#: 2147001.4
	SERIES: 7.5	LAT/LONG: 33.958 / 86.151	RESEARCH DATE: 02/19/2008
	SCALE: 1:24000		

Historical Topographic Map



	TARGET QUAD	SITE NAME: Proposed Little Canoe Creek Industrial Park	CLIENT: S&ME
	NAME: STEELE		CONTACT: Bob Jackson
	MAP YEAR: 1972	ADDRESS: Canoe Creek Road North	INQUIRY#: 2147001.4
	PHOTOREVISED FROM: 1947	Gadsden, AL 35954	RESEARCH DATE: 02/19/2008
	SERIES: 7.5	LAT/LONG: 33.958 / 86.151	
	SCALE: 1:24000		

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2/18/08

Site Name:

Proposed Little Canoe Creek
Canoe Creek Road North
Gadsden, AL 35954

Client Name:

S&ME
2713 Kanasita Dr
Hixson, TN 37343

EDR Inquiry # 2147001.3

Contact: Bob Jackson



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Certified Sanborn Results:

Site Name: Proposed Little Canoe Creek Industrial Park
Address: Canoe Creek Road North
City, State, Zip: Gadsden, AL 35954
Cross Street:
P.O. # NA
Project: NA
Certification # F902-4B75-8C2B



Sanborn® Library search results
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Total Maps: 0

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- University Publications of America
- EDR Private Collection

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APPENDIX D
USER PROVIDED INFORMATION

FINAL
PHASE 1

CHEMICAL WARFARE MATERIEL
ENGINEERING EVALUATION/COST ANALYSIS REPORT

Prepared For:

U.S. ARMY CORPS OF ENGINEERS
HUNTSVILLE CENTER

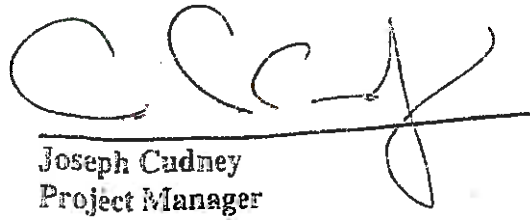
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Delivery Order 0029



Prepared By:

PARSONS
ATLANTA, GEORGIA

JUNE 2005


Joseph Cudney
Project Manager


Laura Kelley
QC Reviewer

TABLE OF CONTENTS

	Page
TABLE OF CONTENTS	i
LIST OF TABLES	viii
LIST OF FIGURES	ix
LIST OF PHOTOS	x
LIST OF ACRONYMS	xi
GLOSSARY	xvi
EXECUTIVE SUMMARY	ES-1
SECTION 1 INTRODUCTION.....	1-1
1.1 Background.....	1-1
1.1.1 Project Authorization.....	1-1
1.1.2 Purpose and Scope	1-2
1.2 Report Organization.....	1-2
1.3 Project Team.....	1-3
1.3.1 U.S. Army Engineer District, Mobile (CESAM).....	1-3
1.3.2 U.S. Army Engineering and Support Center, Huntsville (USAESCH)	1-3
1.3.3 Product Manager for Non-Stockpile Chemical Materiel (PMNSCM)	1-3
1.3.4 Edgewood Chemical Biological Center (ECBC).....	1-3
1.3.5 U.S. Army Technical Escort Unit (TEU).....	1-3
1.3.6 Parsons.....	1-3
1.3.7 Subcontractors.....	1-4
SECTION 2 SITE DESCRIPTION AND HISTORY	2-1
2.1 Project Location.....	2-1
2.2 Physical Description	2-2
2.2.1 Geology.....	2-2
2.2.2 Topography, Soils, and Vegetation.....	2-2
2.2.3 Climate.....	2-3
2.3 Demographics.....	2-3
2.4 Site History	2-3
2.5 Current and Future Site Use	2-5
2.6 Previous Investigations.....	2-5
2.6.1 1993 Archives Search Report	2-5
2.6.2 1993 Site Survey of Formerly Used Defense Sites.....	2-5

TABLE OF CONTENTS (CONTINUED)

		Page
	2.6.3 1995 Phase I Site Characterization	2-6
	2.6.4 1995 Phase II Site Characterization	2-6
	2.6.5 1997 Site Visits and Record Search/Review	2-6
SECTION 3	SITE INVESTIGATION	3-1
	3.1 Introduction	3-1
	3.2 Geophysical Surveys	3-1
	3.2.1 Introduction	3-1
	3.2.2 Location Equipment	3-1
	3.2.3 Geophysical Prove-Out	3-2
	3.2.4 Geophysical Survey Equipment	3-2
	3.2.5 Grid and Transect Preparation	3-4
	3.2.6 G-858 Surveys	3-4
	3.2.7 EM61 and EM61 Mk2 Surveys	3-5
	3.2.8 EM31 Survey	3-5
	3.2.9 G-858 Downloading and Processing	3-6
	3.2.10 EM61 and EM61 Mk2 Downloading and Processing	3-6
	3.2.11 EM31 Downloading and Processing	3-6
	3.2.12 Quality Control	3-7
	3.2.13 Anomaly Identification	3-8
	3.2.14 Anomaly Reacquisition	3-8
	3.3 Air Monitoring	3-8
	3.3.1 Photoionization Detector	3-9
	3.3.2 Aerosol Monitoring	3-9
	3.3.3 Colorimetric Tubes	3-9
	3.3.4 Miniature Chemical Agent Monitoring System (MINICAMS)	3-9
	3.3.5 Depot Area Air Monitoring System (DAAMS)	3-10
	3.4 Intrusive Excavation Into Suspect CWM Areas	3-10
	3.5 Soil Sampling and Analysis	3-10
	3.6 IDW Disposal	3-11
	3.7 Source, Nature, and Extent of CWM	3-12
	3.8 Update of Archives Search Report	3-12
SECTION 4	RESPONSE ACTION EVALUATION PROCESS	4-1
	4.1 Introduction	4-1
	4.2 Applicable or Relevant and Appropriate Requirements (ARARs)	4-1
	4.3 Qualitative Risk Evaluation	4-3
	4.4 Institutional Analysis	4-4

TABLE OF CONTENTS (CONTINUED)

	Page
4.5 Identification of Response Action Objectives	4-4
4.5.1 Response Action Goal.....	4-4
4.5.2 Response Action Objectives	4-4
4.6 Identification and Description of CWM Response Alternatives	4-5
4.6.1 Introduction.....	4-5
4.6.2 Alternative 1: No DoD Action Indicated	4-5
4.6.3 Alternative 2: Institutional Controls	4-6
4.6.4 Alternative 3: CWM Removal	4-6
4.7 Alternative Screening	4-6
4.7.1 Effectiveness.....	4-7
4.7.2 Implementability	4-8
4.7.3 Cost.....	4-9
SECTION 5 SITE 2B: CHEMICAL LAND MINE TRAINING AREA	5-1
5.1 Site History	5-1
5.2 Previous Investigations	5-2
5.2.1 1993 Archives Search Report	5-2
5.2.2 1995 Phase I Site Characterization	5-2
5.3 Investigation Results.....	5-2
5.3.1 2000 Geophysical Investigation.....	5-2
5.3.2 2002 Intrusive Investigation.....	5-4
5.4 Description of Hazards of Specific CWM Encountered.....	5-7
5.5 Qualitative Risk Evaluation	5-7
5.6 Institutional Analysis.....	5-7
5.7 Identification and Analysis of CWM Response Alternatives for Site 2B and Alternate Site 2B – Chemical Land Mine Training Area	5-7
5.7.1 Introduction.....	5-7
5.7.2 Alternative 1: No DoD Action Indicated	5-8
5.7.3 Alternative 2: Institutional Controls	5-8
5.7.4 Alternative 3: Removal	5-8
5.7.5 Summary of Remaining CWM Response Action Alternatives	5-8
5.8 Comparative Analysis of Response Alternatives for Site 2B and Alternate Site 2b – Chemical Land Mine Training Area	5-9
5.8.1 Introduction.....	5-9
5.8.2 Effectiveness	5-9
5.8.3 Implementability	5-10
5.8.4 Cost.....	5-11

TABLE OF CONTENTS (CONTINUED)

		Page
	5.8.5 Overall Evaluation	5-11
5.9	Recommended Response Action	5-11
SECTION 6	SITE 8: TOXIC MUNITIONS IMPACT AREA.....	6-1
6.1	Site History	6-1
6.2	Previous Investigations	6-2
	6.2.1 1993 Archives Search Report	6-2
6.3	Investigation Results.....	6-2
	6.3.1 2000 Geophysical Investigation.....	6-2
	6.3.2 2002 Intrusive Investigation.....	6-3
	6.3.3 2002 Geophysical Investigation.....	6-6
6.4	Description of Hazards of Specific CWM Encountered.....	6-7
6.5	Qualitative Risk Evaluation.....	6-7
6.6	Institutional Analysis.....	6-8
6.7	Identification and Analysis of CWM Response Alternatives for Site 8 -- Toxic Munitions Impact Area.....	6-8
	6.7.1 Introduction.....	6-8
	6.7.2 Alternative 1: No DoD Action Indicated	6-8
	6.7.3 Alternative 2: Institutional Controls	6-8
	6.7.4 Alternative 3: Removal	6-9
	6.7.5 Summary of Remaining CWM Response Action Alternatives	6-10
6.8	Comparative Analysis of Response Alternatives for Site 8 -- Toxic Munitions Impact Area.....	6-10
	6.8.1 Introduction.....	6-10
	6.8.2 Effectiveness.....	6-11
	6.8.3 Implementability	6-12
	6.8.4 Cost	6-13
	6.8.5 Overall Evaluation	6-13
6.9	Recommended Response Action	6-14
SECTION 7	SITE 9: 4.2" MORTAR RANGE.....	7-1
7.1	Site History	7-1
7.2	Previous Investigations.....	7-1
	7.2.1 1993 Archives Search Report	7-1
	7.2.2 1995 Phase II Site Characterization	7-2
7.3	Investigation Results.....	7-2
	7.3.1 2000 Geophysical Investigation.....	7-2
	7.3.2 2002 Intrusive Investigation.....	7-2

TABLE OF CONTENTS (CONTINUED)

		Page
7.4	Description of Hazards of Specific CWM Encountered.....	7-4
7.5	Qualitative Risk Evaluation.....	7-4
7.6	Institutional Analysis.....	7-5
7.7	Identification and Analysis of CWM Response Alternatives for Site 9 – 4.2" Mortar Range	7-5
	7.7.1 Introduction.....	7-5
	7.7.2 Alternative 1: No DoD Action Indicated	7-5
	7.7.3 Alternative 2: Institutional Controls	7-5
	7.7.4 Alternative 3: Removal	7-6
	7.7.5 Summary of Remaining CWM Response Action Alternatives	7-6
7.8	Comparative Analysis of Response Alternatives for Site 9 – 4.2" Mortar Range and Toxic Gas Yard.....	7-6
	7.8.1 Introduction.....	7-6
	7.8.2 Effectiveness.....	7-7
	7.8.3 Implementability	7-7
	7.8.4 Cost.....	7-8
	7.8.5 Overall Evaluation	7-8
7.9	Recommended Response Action	7-8
SECTION 8	SITE 13: POSSIBLE CONTAMINATED EQUIPMENT BURIAL	
	SITE	8-1
8.1	Site History.....	8-1
8.2	Previous Investigations.....	8-1
	8.2.1 1993 Archives Search Report	8-1
	8.2.2 1995 Phase I Site Characterization	8-1
8.3	Investigation Results.....	8-2
	8.3.1 2000 Geophysical Investigation.....	8-2
	8.3.2 2001 Geophysical Investigation.....	8-3
	8.3.3 2002 Intrusive Investigation.....	8-3
	8.3.4 Soil Sampling.....	8-5
8.4	Description of Hazards of Specific CWM Encountered.....	8-5
8.5	Qualitative Risk Evaluation.....	8-5
8.6	Institutional Analysis.....	8-6
8.7	Identification and Analysis of CWM Response Alternatives for Site 13 – Possible Equipment Burial Site	8-6
	8.7.1 Introduction.....	8-6
	8.7.2 Alternative 1: No DoD Action Indicated	8-6
	8.7.3 Alternative 2: Institutional Controls	8-7

TABLE OF CONTENTS (CONTINUED)

		Page
	8.7.4 Alternative 3: Removal	8-7
	8.7.5 Summary of Remaining CWM Response Action Alternatives	8-7
8.8	Comparative Analysis of Response Alternatives for Site 13 – Possible Equipment Burial Site	8-7
	8.8.1 Introduction	8-7
	8.8.2 Effectiveness	8-8
	8.8.3 Implementability	8-8
	8.8.4 Cost	8-9
	8.8.5 Overall Evaluation	8-9
8.9	Recommended Response Action	8-9
SECTION 9	SITE 14: POSSIBLE MUNITIONS BURIAL AREA.....	9-1
9.1	Site History	9-1
9.2	Previous Investigations	9-1
	9.2.1 1993 Archives Search Report	9-1
9.3	Investigation Results	9-2
	9.3.1 2000 Geophysical Investigation	9-2
	9.3.2 2002 Intrusive Investigation	9-2
9.4	Description of Hazards of Specific CWM Encountered	9-4
9.5	Qualitative Risk Evaluation	9-4
9.6	Institutional Analysis	9-5
9.7	Identification and Analysis of CWM Response Alternatives for Site 14 – Possible Munitions Burial Area	9-5
	9.7.1 Introduction	9-5
	9.7.2 Alternative 1: No DoD Action Indicated	9-5
	9.7.3 Alternative 2: Institutional Controls	9-6
	9.7.4 Alternative 3: Removal	9-6
	9.7.5 Summary of Remaining CWM Response Action Alternatives	9-6
9.8	Comparative Analysis of Response Alternatives for Site 14 – Possible Munitions Burial Area	9-6
	9.8.1 Introduction	9-6
	9.8.2 Effectiveness	9-7
	9.8.3 Implementability	9-7
	9.8.4 Cost	9-8
	9.8.5 Overall Evaluation	9-8
9.9	Recommended Response Action	9-8

**TABLE OF CONTENTS
(CONTINUED)**

	Page
SECTION 10 RECURRING REVIEWS.....	10-1
10.1 Follow-On Activities	10-1
SECTION 11 REFERENCES.....	11-1
APPENDIX A SCOPE OF WORK	
APPENDIX B INSTITUTIONAL ANALYSIS REPORT	
APPENDIX C DAILY SITUATION AND CLEARANCE REPORTS, ANALYTICAL DATA, DATA VALIDATION REPORT	
APPENDIX D HAZARDOUS WASTE MANIFEST AND CERTIFICATE OF DESTRUCTION FORMS	

EXECUTIVE SUMMARY

ES1 The former Camp Sibert is a 37,035-acre site located in Etowah and St. Clair Counties, Alabama that was used for various training activities between 1942 and 1945. Training in aspects of both basic military training and in the use of chemical weapons, decontamination procedures, and smoke operations were conducted. Mustard and other chemical warfare agents were used in the training. In addition to chemical training, several types and caliber of conventional weapons had been fired at the former Camp Sibert, with the 4.2-inch mortar being the heavy weapon used most in training. Camp Sibert was declared surplus after World War II. After decontamination of various ranges and toxic areas in 1948, the land was declared excess and transferred back to private and local government ownership.

ES2 In 1993, the U.S. Army Corps of Engineers (USACE), St. Louis District conducted a site inspection and archives search of the former Camp Sibert. A Risk Assessment Code (RAC) scoring was performed as part of the archives search report (ASR) and resulted in a RAC score of "1" on a scale of 1 to 5 with 1 being the highest risk score. A RAC score of 1 was given because as a former Chemical Warfare Service Training area, personnel reportedly used large amounts of chemical agents and the interview and ASR site survey suggested that some agents may remain in the area.

ES3 Based on previous site studies, archives searches, and interviews, thirteen sites within the former Camp Sibert property were suspected to be potential chemical warfare materiel (CWM) disposal locations. A Determination of the Applicability of Interim Guidance for Former Camp Sibert (January, 2002) was prepared by the U.S. Army Engineering and Support Center, Huntsville (USAESCH) and identified sites of these thirteen that have a low likelihood for the presence of CWM. Specifically, USAESCH concluded that 4 of 13 sites exhibit an unlikely or seldom probability for encountering CWM, or a likely probability of encountering agent contaminated soil or equipment. Two of the 13 sites exhibit an unlikely or seldom probability for CWM, and a likely probability for encountering agent contaminated soil or equipment. Parsons conducted this Engineering Evaluation/Cost Analysis (EE/CA) at five of these sites under a Local Approved Work Plan (Parsons, 2002a). The sixth site (Site 2A) was not investigated as it was later thought to have a potentially higher likelihood of encountering CWM and therefore the investigation would be required to be completed under an approved Chemical Safety Submission.

ES4 The purpose of the EE/CA is to characterize the nature and extent of CWM, assess the risk posed by any recovered chemical warfare materiel (RCWM), study risk management alternatives and identify the appropriate response action to address any identified risks to the public. Five sites were investigated using geophysical methods, soil sampling and analysis, and excavation.

ES-1

ES5 No residual chemical warfare agent or agent degradation products were detected in the soils at the sites sampled. No evidence of CWM was encountered at four of the five sites (Site 2B – Chemical Landmine Training Area, Site 9 – 4.2" Mortar Range, Site 13 – Possible Contaminated Equipment Burial Site, and Site 14 – Possible Munitions Burial Area). Based on the historical documentation and sampling conducted during this EE/CA, No Department of Defense Action Indicated (NDAI) is recommended for these four sites.

ES6 One phosgene-filled 4.2-inch mortar round was recovered and subsequently destroyed at Site 8 – Toxic Munitions Impact Area. A removal action was recommended in Site 8 based upon this finding and the subsequent geophysical mapping of several thousand metallic anomalies, many of them centered within the "impact area" inferred from geophysical data. The cost for the removal action at Site 8 is estimated to be \$13,800,000 for the contractor, \$14,100,000 for support agencies, and \$3,500,000 for USAESCH in-house and USACE, Mobile District. It is also recommended that Institutional Controls be implemented and that construction support be provided for construction activities within the affected area until funds are made available to implement the clearance action. The recommended Institutional Controls include the following components: notification during permitting and property transfer; printed media; audio/visual media awareness program; classroom education; exhibits and displays; internet website; and an Ad hoc committee. The initial cost to implement these Institutional Controls is approximately \$49,525 with an annual recurring cost of \$2,000.

SECTION 1 INTRODUCTION

1.1 BACKGROUND

1.1.1 Project Authorization

1.1.1 Parsons received Contract No. DACA87-00-D-0038, Delivery Order No. 0029, from USAESCH. The objective of this order was to conduct an EE/CA for potential CWM and, if co-located, ordnance and explosive (OE) waste at five sites at former Camp Sibert, located in Etowah and St. Clair Counties, Alabama.

1.1.2 The memorandum Interim Guidance for Biological Warfare Materiel (BWM) and Non-Stockpile Chemical Warfare Materiel (CWM) Response Activities (DA, 1997) (referred to as Interim Guidance) provides procedures that are required to be followed to ensure protection of workers, the public, and the environment when responding to planned (i.e., an investigation or removal project specifically targeted for recovery of CWM) and unplanned discoveries of CWM (responding to the unintentional discovery of CWM). The memorandum Applicability of Biological Warfare Materiel and Non-Stockpile Chemical Materiel Response Activity Interim Guidance (DA, 1998), developed procedures to determine if the Interim Guidance is to be followed in instances other than those specifically targeted for recovery of CWM. The USACE issued the memorandum Applicability of Biological Warfare Materiel and Non-Stockpile Chemical Warfare Materiel Response Activity Interim Guidance (USACE, 1998) requiring immediate implementation of the DA 1998 memorandum.

1.1.3 The Interim Guidance procedures are applicable to those sites presenting an occasional, probable or frequent likelihood for encountering CWM (DA, 1998). CWM is defined as an item configured as a munition containing a chemical substance that is intended to kill, seriously injure, or incapacitate a person through its physiological effects. Items not meeting this definition of CWM, including soil, water, debris, and other media contaminated with chemical warfare agent, are considered and treated as industrial chemicals and are not subject to the requirements of the Interim Guidance (DA, 1997). If the probability of encountering CWM is improbable or remote, the Interim Guidance will not be implemented and the site activities may be conducted as a non-CWM site (DA, 1998).

1.1.4 A Determination of the Applicability of Interim Guidance for Camp Sibert (January, 2002) was prepared by USAESCH and identified sites that have a low likelihood for the presence of CWM. A Local Approved Work Plan (LAWP) is appropriate on sites where chemical warfare agent may be present in soil and other media, but which have a low likelihood for the presence of CWM. At sites where the Interim

Guidance is applicable, response actions, including environmental investigations, must be conducted under an approved Site Safety Submission. At sites where the Interim Guidance is not applicable, response actions and investigations may be conducted under a LAWP.

1.1.2 Purpose and Scope

1.1.2.1 The purpose of this EE/CA is to characterize the nature and extent of any CWM, assess the risk posed by any residual CWM items, study risk management alternatives and identify the appropriate response action to address the risks to the public. This EE/CA report addresses these issues at the following sites:

- Site 2B – Chemical Landmine Training Area;
- Site 8 – Toxic Munitions Impact Area;
- Site 9 – 4.2" Mortar Range;
- Site 13 – Possible Contaminated Equipment Burial Site; and
- Site 14 – Possible Munitions Burial Area.

1.1.2.2 This EE/CA was conducted under a LAWP (Parsons, 2002a). The scope of the EE/CA included review of existing site data; site characterization efforts involving intrusive excavation, chemical sampling, and data collection to determine or classify those portions of the site that may be potentially contaminated with CWM; and determination of the nature and extent of any CWM, if encountered. Included in the effort was an evaluation of a range of strategies for risk abatement and recommendations for preferred alternative(s) for these sites.

1.1.2.3 This EE/CA was conducted as a non-time-critical removal action in a manner consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP). A non-time-critical removal action is an action that has a planning period of more than 6 months.

1.2 REPORT ORGANIZATION

This report was organized to first present general discussions of the background and purpose of the work performed, as well as the common approaches and procedures used to characterize the sites (Sections 1 to 3). Section 4 discusses the response evaluation process including applicable or relevant and appropriate requirements (ARARs), the qualitative risk evaluation process, and the alternative screening process. Each site where investigations were conducted under this EE/CA is fully addressed in Sections 5 through 9. Section 10 discusses the recurring review, and references are included in Section 11. Supporting information, results, and procedures are provided in appendices.

1.3 PROJECT TEAM

Several organizations were directly involved in the former Camp Sibert CWM EE/CA. The roles of these team members are described below. A detailed description of the project team members can be found in Section 1 of the LAWP (Parsons, 2002a).

1.3.1 U.S. Army Engineer District, Mobile (CESAM)

CESAM was the Life Cycle Project Manager for this project. CESAM responsibilities included review of project plans and documents, working with the news media and the public, and coordinating with State and local regulatory agencies on issues pertaining to protection of ecological and cultural resources.

1.3.2 U.S. Army Engineering and Support Center, Huntsville (USAESCH)

USAESCH was the implementing agency for execution of this project and provided technical expertise for CWM and OE activities. USAESCH responsibilities included procurement of EE/CA contractor services (Parsons), oversight of project implementation, and coordination of document reviews.

1.3.3 Product Manager for Non-Stockpile Chemical Material (PMNSCM)

PMNSCM provided support to USAESCH for planning the implementation of temporary storage, shipment and final disposition of recovered CWM.

1.3.4 Edgewood Chemical Biological Center (ECBC)

During all intrusive operations, ECBC conducted the air monitoring for chemical warfare agents in the exclusion zone. ECBC also provided analysis for chemical warfare agents and degradation products on soil samples collected from excavations and discrete locations. Additionally, when suspect CWM scrap was encountered, ECBC conducted headspace monitoring by heating the scrap in a container and analyzing the vapors for chemical warfare agent as described in Appendix E of the LAWP (Parsons, 2002a).

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

U.S. Army TEU assumed control of the exclusion zone after a suspect CWM item was encountered at Site 8 – Toxic Munitions Impact Area. TEU was responsible for the assessment, packaging, and transportation of the suspect item.

1.3.6 Parsons

Parsons, as the prime contractor to USAESCH, prepared the Work Plan submittal and provided overall engineering support and services for implementation of the EE/CA. Parsons was responsible for performance of the activities detailed in the Scope of Work (SOW) (Appendix A). Parsons was also responsible for control of the schedule and budget.

**TABLE OF CONTENTS
(CONTINUED)**

2.6.10 2002 Site 8 Geophysical Investigation2-8

SECTION 3 SITE INVESTIGATION3-1

3.1 Introduction3-1

3.2 Geophysical Surveys3-1

3.2.1 Introduction.....3-1

3.2.2 Location Equipment.....3-1

3.2.3 Geophysical Prove-Out.....3-2

3.2.4 Geophysical Survey Equipment.....3-2

3.2.5 Grid and Transect Preparation.....3-3

3.2.6 G-858 Surveys3-3

3.2.7 EM61 Surveys3-4

3.2.8 EM31 Survey3-4

3.2.9 G-858 Downloading and Processing3-4

3.2.10 EM61 Downloading and Processing3-5

3.2.11 EM31 Downloading and Processing3-5

3.2.12 Quality Control3-5

3.2.13 Anomaly Identification3-6

3.2.14 Anomaly Reacquisition3-7

3.3 Air Monitoring3-7

3.3.1 Photoionization Detector3-7

3.3.2 Aerosol Monitoring3-7

3.3.3 Carbon Monoxide (CO) Monitoring.....3-7

3.3.4 Colorimetric Tubes3-8

3.3.5 Miniature Chemical Agent Monitoring System3-8

3.3.6 Depot Area Air Monitoring System3-8

3.4 Intrusive Excavation into Suspect CWM Areas.....3-8

3.5 Soil Sampling and Analysis.....3-9

3.6 Investigative Derived Waste (IDW) Disposal3-10

3.7 Source, Nature, and Extent of CWM3-10

3.8 Update of Archives Search Report.....3-11

SECTION 4 RESPONSE ACTION EVALUATION PROCESS4-1

4.1 Introduction4-1

4.2 Applicable or Relevant and Appropriate Requirements (ARARs)4-1

4.3 Qualitative Risk Evaluation.....4-3

4.4 Institutional Analysis.....4-4

4.5 Identification of Response Action Objectives.....4-4

4.5.1 Response Action Goal4-4

4.5.2 Response Action Objectives.....4-4

4.6 Identification and Description of CWM Response Alternatives.....4-5

4.6.1 Introduction.....4-5

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY	ES-1
SECTION 1 INTRODUCTION	1-1
1.1 Background.....	1-1
1.1.1 Project Authorization.....	1-1
1.1.2 Regulatory Overview.....	1-1
1.2 Purpose and Scope.....	1-1
1.2.1 Project Purpose.....	1-1
1.2.2 Scope and Objectives.....	1-2
1.3 Report Organization	1-3
1.4 Technical Project Planning (TPP) Team.....	1-3
1.4.1 U.S. Army Corps of Engineers, Mobile District	1-4
1.4.2 U.S. Army Engineering and Support Center, Huntsville.....	1-4
1.4.3 U.S. Army Technical Escort Unit.....	1-4
1.4.4 U.S. Army Edgewood Chemical Biological Center	1-4
1.4.5 Alabama Department of Environmental Management	1-4
1.4.6 Etowah County Emergency Management Agency	1-5
1.4.7 Parsons.....	1-5
1.4.8 Subcontractors	1-5
SECTION 2 SITE DESCRIPTION AND HISTORY	2-1
2.1 Project Location	2-1
2.2 Physical Description.....	2-2
2.2.1 Geology.....	2-2
2.2.2 Topography, Soils, and Vegetation	2-2
2.2.3 Climate.....	2-3
2.3 Demographics.....	2-3
2.4 Site History.....	2-3
2.5 Current and Future Land Use.....	2-5
2.6 Previous Investigations.....	2-6
2.6.1 1990 Confirmation Study	2-6
2.6.2 1993 Site Survey of Formerly Used Defense Sites	2-6
2.6.3 1993 Archives Search Report	2-6
2.6.4 1995 Phase I Site Characterization	2-6
2.6.5 1995 Phase II Site Characterization.....	2-6
2.6.6 1996 Site Investigation Report	2-7
2.6.7 1997 Site Visits and Record Search/Review	2-7
2.6.8 1999 Geophysical Information System (GIS)-Based Historical Time Sequenced Analysis	2-7
2.6.9 Phase I CWM EE/CA	2-7

PARSONS

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May 19, 2006

U.S. Army Engineering & Support Center
ATTN: CEHNC-OE-CW (Sherri Anderson-Hudgins)
4820 University Square
Huntsville, AL 35816-1822
256-895-1522

Subject: Contract DACA87-00-D-0038, Delivery Order 0029
Final Phase II Chemical Warfare Materiel Engineering Evaluation/Cost
Analysis Report
Former Camp Sibert, Etowah and St. Clair Counties, Alabama

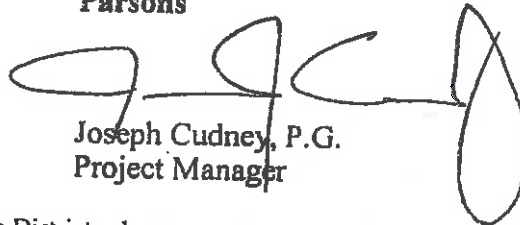
Dear Ms. Anderson-Hudgins:

Enclosed please find five copies of the Final CWM Phase II EE/CA Report dated May 2006 for the former Camp Sibert project. The distribution of additional copies is as shown below.

If you have any questions regarding this letter or need additional information, please contact me at (678) 969-2344 or (404) 606-0347 (cell).

Sincerely,

Parsons



Joseph Cudney, P.G.
Project Manager

cc: Mr. Karl Blankinship, USACE Mobile District - 1 copy
Mr. Michael McKown, USACE Mobile District - 1 copy
Mr. Stephen Cobb, ADEM - 3 copies
Mr. Jon Johnson, USEPA - 1 copy
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FINAL

PHASE II

CHEMICAL WARFARE MATERIEL

ENGINEERING EVALUATION/COST ANALYSIS REPORT

Prepared For

U.S. ARMY CORPS OF ENGINEERS
HUNTSVILLE CENTER

Contract No. DACA87-00-D-0038
Delivery Order 0029



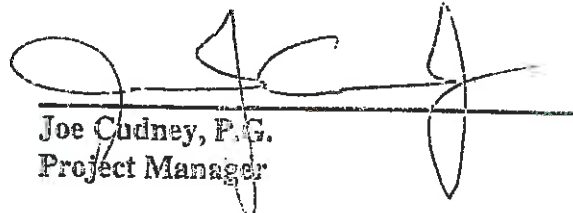
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PARSONS
ATLANTA, GEORGIA

May 19, 2006



John Chulick
QC Reviewer



Joe Cudney, P.G.
Project Manager

Phase II
Chemical Warfare Materiel
Engineering Evaluation/Cost Analysis
Report

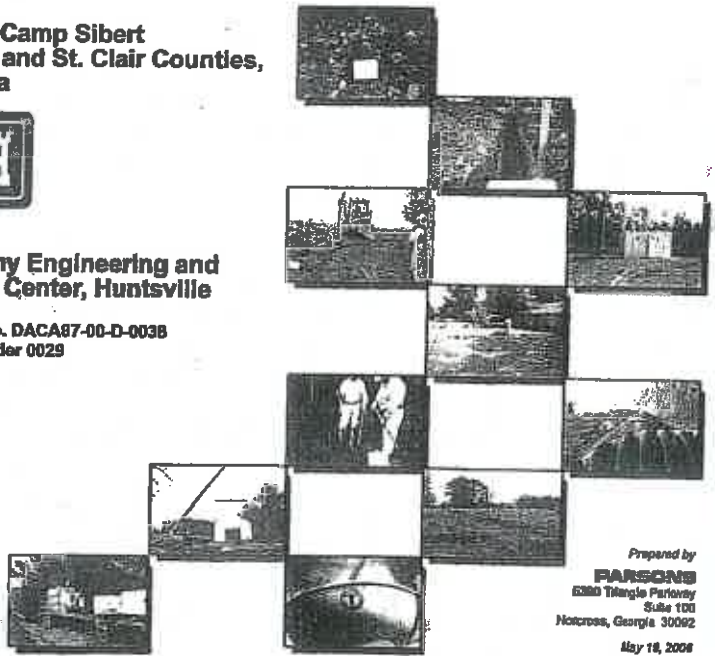
Former Camp Sibert
Etowah and St. Clair Counties,
Alabama



Prepared for

**U.S. Army Engineering and
Support Center, Huntsville**

Contract No. DACA87-00-D-0038
Delivery Order 0029



Prepared by
PARSONS
6380 Tingle Parkway
Suite 100
Norcross, Georgia 30062
May 18, 2008
742885

1.3.7 Subcontractors

1.3.7.1 Human Factors Applications, Inc., (HFA) under contract to Parsons, provided unexploded ordnance (UXO)-qualified escort services needed to conduct the field investigation, conducted surface clearance of the sampling areas and access routes, cleared brush for access, and conducted the intrusive investigations.

1.3.7.2 Jones, Blair, Waldrup and Tucker, Inc. of Gadsen, Alabama, provided surveying services to locate the geophysical grids, soil borings, and trenches.

1.3.7.3 At Site 8, Anniston Emergency Medical Services provided an onsite ambulance and paramedics trained to handle potential exposure of personnel to chemical agents during the destruction of RCWM. The paramedics also monitored site workers for signs of stress (body temperature, heart rate, etc.) during the RCWM destruction, in accordance with the LAWP (Parsons, 2002a).

**TABLE OF CONTENTS
(CONTINUED)**

	4.6.2	Alternative 1: No DoD Action Indicated.....	4-5
	4.6.3	Alternative 2: Institutional Controls.....	4-5
	4.6.4	Alternative 3: CWM Removal.....	4-6
4.7		Alternative Screening.....	4-6
	4.7.1	Overview.....	4-6
	4.7.2	Effectiveness.....	4-7
	4.7.3	Implementability.....	4-8
	4.7.4	Cost.....	4-9
SECTION 5		SITE 2A: CHEMICAL MUNITIONS BURIAL SITE - TRACT C230.....	5-1
	5.1	Site History.....	5-1
	5.2	Previous Investigations.....	5-2
	5.2.1	1990 Confirmation Study.....	5-2
	5.2.2	1993 Archives Search Report.....	5-3
	5.2.3	1995 Phase I Site Characterization Report.....	5-3
	5.2.4	1996 Site Investigation Report.....	5-3
	5.3	Investigation Results.....	5-3
	5.3.1	Phase I 2000 Geophysical Investigation.....	5-4
	5.3.2	Phase II 2004 Intrusive Investigation Results.....	5-5
	5.4	Description of Hazards of Specific CWM Encountered.....	5-11
	5.5	Qualitative Risk Evaluation.....	5-11
	5.6	Institutional Analysis.....	5-12
	5.7	Identification and Analysis of CWM Response Alternatives for Site 2A - Chemical Munitions Burial Site - Tract C230.....	5-12
	5.7.1	Introduction.....	5-12
	5.7.2	Alternative 1: No DoD Action Indicated.....	5-12
	5.7.3	Alternative 2: Institutional Controls.....	5-12
	5.7.4	Alternative 3: Removal.....	5-13
	5.7.5	Summary of Remaining CWM Response Action Alternatives.....	5-13
	5.8	Comparative Analysis of Response Alternatives for Site 2A - Chemical Munitions Burial Site - Tract C230.....	5-14
	5.8.1	Introduction.....	5-14
	5.8.2	Effectiveness.....	5-14
	5.8.3	Implementability.....	5-15
	5.8.4	Cost.....	5-16
	5.8.5	Overall Evaluation.....	5-17
	5.9	Recommended Response Action.....	5-17

TABLE OF CONTENTS
(CONTINUED)

SECTION 6	SITE 3: FORMER TOXIC GAS YARD AND BURIAL SITE TRACT D340.....	6-1
	6.1 Site History.....	6-1
	6.2 Previous Investigations.....	6-2
	6.2.1 1993 Archives Search Report.....	6-2
	6.2.2 1999 GIS-Based Historical Time Sequenced Analysis.....	6-2
	6.3 Investigation Results.....	6-2
	6.3.1 2000 Geophysical Investigation.....	6-2
	6.3.2 2004 Intrusive Investigation Results.....	6-3
	6.4 Descriptions of Hazards of Specific CWM Encountered.....	6-7
	6.5 Qualitative Risk Evaluation.....	6-7
	6.6 Institutional Analysis.....	6-7
	6.7 Identification and Analysis of CWM Response Alternatives for Site 3 - Former Toxic Gas Yard and Burial Site - Tract D340.....	6-7
SECTION 7	SITE 4: TOXIC GAS YARD.....	7-1
	7.1 Site History.....	7-1
	7.2 Previous Investigations.....	7-2
	7.2.1 1990 Confirmation Study.....	7-2
	7.2.2 1993 Archives Search Report.....	7-2
	7.2.3 1995 Phase I and Phase II Site Characterization.....	7-2
	7.2.4 1999 GIS-Based Historical Time Sequenced Analysis.....	7-2
	7.3 Investigation Results.....	7-3
	7.3.1 2000 Geophysical Investigation.....	7-3
	7.3.2 2004 Intrusive Investigation Results.....	7-3
	7.4 Description of Hazards of Specific CWM Encountered.....	7-6
	7.5 Qualitative Risk Evaluation.....	7-6
	7.6 Institutional Analysis.....	7-6
	7.7 Identification and Analysis of CWM Response Alternatives for Site 4 - Toxic Gas Yard.....	7-6
SECTION 8	SITE 6 - CHEMICAL FILLING AREA, DA-5.....	8-1
	8.1 Site History.....	8-1
	8.2 Previous Investigations.....	8-2
	8.2.1 1993 Archives Search Report.....	8-2
	8.3 Investigation Results.....	8-2
	8.3.1 2000 Geophysical Investigation.....	8-2
	8.3.2 2004 Intrusive Investigation Results.....	8-3
	8.4 Description of Hazards of Specific CWM Encountered.....	8-6
	8.5 Qualitative Risk Evaluation.....	8-6
	8.6 Institutional Analysis.....	8-6
	8.7 Identification and Analysis of CWM Response Alternatives for Site 6 - Chemical Filling Area, DA-5.....	8-6

TABLE OF CONTENTS (CONTINUED)

	8.7.1	Introduction.....	8-6
	8.7.2	Alternative 1: No DoD Action Indicated.....	8-7
	8.7.3	Alternative 2: Institutional Controls.....	8-7
	8.7.4	Alternative 3: Removal.....	8-7
	8.7.5	Summary of Remaining CWM Response Alternatives.....	8-7
8.8		Comparative Analysis of Response Alternatives for Site 6 - Chemical Filling Area, DA-5.....	8-7
	8.8.1	Introduction.....	8-7
	8.8.2	Effectiveness.....	8-8
	8.8.3	Implementability.....	8-9
	8.8.4	Cost.....	8-9
	8.8.5	Overall Evaluation.....	8-9
8.9		Recommended Response Action.....	8-10
SECTION 9		SITE 11 AND SITE 11A: POSSIBLE MUNITIONS BURIAL AREA.....	9-1
	9.1	Site History.....	9-1
	9.2	Previous Investigations.....	9-2
	9.2.1	1993 Archives Search Report.....	9-2
	9.2.2	1995 Phase I Site Characterization.....	9-2
	9.2.3	1999 GIS-Based Historical Time Sequenced Analysis.....	9-2
	9.3	Investigation Results.....	9-3
	9.3.1	2000 Geophysical Investigation.....	9-3
	9.3.2	2004 Intrusive Investigation Results.....	9-3
	9.4	Description of Hazards of Specific CWM Encountered.....	9-4
	9.5	Qualitative Risk Evaluation.....	9-5
	9.6	Institutional Analysis.....	9-5
	9.7	Identification and Analysis of CWM Response Alternatives for Site 11 and Site 11A - Possible Munitions Burial Area.....	9-5
	9.7.1	Introduction.....	9-5
	9.7.2	Alternative 1: No DoD Action Indicated.....	9-5
	9.7.3	Alternative 2: Institutional Controls.....	9-6
	9.7.4	Alternative 3: Removal.....	9-6
	9.7.5	Summary of Remaining CWM Response Alternatives.....	9-6
9.8		Comparative Analysis of Response Alternatives for Site 11 and Site 11A - Possible Munitions Burial Area.....	9-6
	9.8.1	Introduction.....	9-6
	9.8.2	Effectiveness.....	9-7
	9.8.3	Implementability.....	9-7
	9.8.4	Cost.....	9-8
	9.8.5	Overall Evaluation.....	9-8
9.9		Recommended Response Action.....	9-8

TABLE OF CONTENTS (CONTINUED)

SECTION 10	SITE 12: SMOKE GENERATOR AND POSSIBLE MUNITIONS BURIAL AREA.....	10-1
	10.1 Site History	10-1
	10.2 Previous Investigations.....	10-1
	10.2.1 1993 Archives Search Report	10-1
	10.2.2 1995 Phase I Site Characterization.....	10-1
	10.3 Investigation Results	10-2
	10.4 Description of Hazards of Specific CWM Encountered	10-2
	10.5 Qualitative Risk Evaluation.....	10-2
	10.6 Institutional Analysis.....	10-2
	10.7 Identification and Analysis of CWM Response Alternatives for Site 12- Smoke Generator and Possible Munitions Burial Area	10-3
SECTION 11	SITE 15: POSSIBLE MUNITIONS BURIAL AREA.....	11-1
	11.1 Site History	11-1
	11.2 Previous Investigations.....	11-1
	11.2.1 1993 Archives Search Report	11-1
	11.2.2 1999 GIS-Based Historical Time Sequenced Analysis	11-1
	11.3 Investigation Results	11-2
	11.3.1 2000 and 2004 Geophysical Survey	11-2
	11.3.2 2004 and 2005 Intrusive Investigation Results.....	11-3
	11.4 Description of Hazards of Specific CWM Encountered	11-6
	11.5 Qualitative Risk Evaluation.....	11-6
	11.6 Institutional Analysis.....	11-6
	11.7 Identification and Analysis of CWM Response Alternatives for Site 15- Possible Munitions Burial Area.....	11-7
	11.7.1 Introduction.....	11-7
	11.7.2 Alternative 1: No DoD Action Indicated.....	11-7
	11.7.3 Alternative 2: Institutional Controls.....	11-7
	11.7.4 Alternative 3: Removal.....	11-7
	11.7.5 Summary of Remaining CWM Response Alternatives	11-7
	11.8 Comparative Analysis of Response Alternatives for Site 15- Possible Munitions Burial Area	11-8
	11.8.1 Introduction.....	11-8
	11.8.2 Effectiveness.....	11-8
	11.8.3 Implementability.....	11-9
	11.8.4 Cost	11-9
	11.8.5 Overall Evaluation	11-9
	11.9 Recommended Response Action.....	11-10

TABLE OF CONTENTS (CONTINUED)

SECTION 12	SITE 16: AIR OPERATIONS FILLING AREA	12-1
	12.1 Site History	12-1
	12.2 Previous Investigations.....	12-1
	12.2.1 1993 Archives Search Report	12-1
	12.2.2 1995 Phase I Site Characterization	12-1
	12.3 Investigation Results	12-2
	12.3.1 2000 Geophysical Survey	12-2
	12.3.2 2004 Intrusive Investigation Results	12-2
	12.4 Description of Hazards of Specific CWM Encountered	12-3
	12.5 Qualitative Risk Evaluation.....	12-4
	12.6 Institutional Analysis.....	12-4
	12.7 Identification and Analysis of CWM Response Alternatives for Site 16- Air Operations Filling Area	12-5
	12.7.1 Introduction.....	12-5
	12.7.2 Alternative 1: No DoD Action Indicated.....	12-5
	12.7.3 Alternative 2: Institutional Controls	12-5
	12.7.4 Alternative 3: Removal.....	12-5
	12.7.5 Summary of Remaining CWM Response Alternatives	12-6
	12.8 Comparative Analysis of Response Alternatives for Site 16- Air Operations Filling Area	12-6
	12.8.1 Introduction.....	12-6
	12.8.2 Effectiveness.....	12-6
	12.8.3 Implementability.....	12-7
	12.8.4 Cost.....	12-8
	12.8.5 Overall Evaluation.....	12-8
	12.9 Recommended Response Action.....	12-8
SECTION 13	FIVE YEAR REVIEWS	13-1
	11.1 Follow-On Activities	13-1
SECTION 14	REFERENCES	14-1
APPENDIX A	STATEMENT OF WORK	
APPENDIX B	INSTITUTIONAL ANALYSIS REPORT	
APPENDIX C	DAILY SITUATION AND CLEARANCE REPORTS; ANALYTICAL DATA; DATA VALIDATION REPORT	
APPENDIX D	HAZARDOUS WASTE MANIFEST AND CERTIFICATE OF DESTRUCTION FORMS	
APPENDIX E	ANOMALY DIG SHEETS	

LIST OF FIGURES

No.	Title	Page
2.1	Location Map of Former Camp Sibert	2-9
2.2	Site Locations	2-10
2.3	Land Use Map	2-11
5.1	Site 2A – Chemical Munitions Burial Site.....	5-32
5.2	Soil Sample and Trench Locations: Site 2A – Chemical Munitions Burial Site	5-33
6.1	Soil Sample Locations: Site 3 – Former Toxic Gas Yard and Burial Site	6-12
7.1	Soil Sample Locations: Site 4 – Former Toxic Gas Yard	7-8
8.1	Site 6 – Possible Munitions Burial Area	8-12
9.1	Site 11 & 11A – Possible Munitions Burial Area	9-10
10.1	Site 12 – Smoke Generator and Possible Munitions Burial Area	10-4
11.1	Site 15 – Possible Munitions Burial Area – 1950	11-14
11.2	Site 15 – Possible Munitions Burial Area - 1997.....	11-15
11.3	Soil Sample Locations: Site 15 – Possible Munitions Burial Area.....	11-16
12.1	Site 16 – Air Operations Filling Area – 1950	12-10
12.2	Soil Sample Locations: Site 16 – Air Operations Filling Area	12-11

LIST OF TABLES

No.	Title	Page
2.1	Summary of Current and Future Land Use.....	2-5
3.1	Summary of Samples Collected and Analytical Testing Performed	3-12
4.1	Potential ARARs for CWM Sites.....	4-10
5.1	Site 2A - Intrusive Investigation Summary	5-18
5.2	Site 2A - Summary of Soil Analyses.....	5-19
5.3	Site 2A - Estimated Costs for Further Action	5-30
5.4	Site 2A - Response Alternative Evaluation	5-31
6.1	Site 3 - Intrusive Investigation Summary	6-9
6.2	Site 3 - Summary of Soil Analyses.....	6-10
8.1	Site 6 - Intrusive Investigation Summary	8-11
9.1	Site 11 and Site 11A - Intrusive Investigation Summary	9-10
11.1	Site 15 - Intrusive Investigation Summary	11-11
11.2	Site 15 - Summary of Soil Analyses.....	11-12
12.1	Site 16 - Intrusive Investigation Summary	12-9

LIST OF ACRONYMS AND ABBREVIATIONS

3X	XXX – Denotes Surface Decontaminated Item
ABP	Agent Breakdown Product
ADEM	Alabama Department of Environmental Management
AEL	Airborne Exposure Limit
ALDOT	Alabama Department of Transportation
AR	Army Regulation
ARAR	Applicable or Relevant and Appropriate Requirement
ASR	Archives Search Report
BGS	Below Ground Surface
CAFS	Chemical Agent Filtration System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESAM	U.S. Army Corps of Engineers, Mobile District
CFR	Code of Federal Regulations
CG	Phosgene – Choking Agent - Industrial Chemical
CNB	Tearing Agent
CO	Carbon Monoxide
CWM	Chemical Warfare Materiel
DA	Demolitions Area
DAAMS	Depot Area Air Monitoring System
DANC	Decontaminating Solution
DDESB	Department of Defense Explosives Safety Board
DERP	Defense Environmental Restoration Program
DGM	Digital Geophysical Mapping
DGPS	Differential Global Positioning System
DID	Data Item Description
DM	Adamsite
DoD	U.S. Department of Defense
ECBC	Edgewood Chemical Biological Center
ECS	Engineering Control Structure
EE/CA	Engineering Evaluation/Cost Analysis

LIST OF ACRONYMS AND ABBREVIATIONS

EMA	Emergency Management Agency
EPA	U.S. Environmental Protection Agency
ESE	Environmental Science & Engineering, Inc.
EZ	Exclusion Zone
FM	Smoke Agent
FS	Fuming Sulfuric Acid (Sulfur Trioxide/Chlorosulphoric Acid Solution)
FUDS	Formerly Used Defense Site
GC/MS	Gas Chromatography/Mass Spectrometry
GFP	Government Furnished Property
GIS	Geographic Information System
H	Mustard – Blister Agent
HD	Distilled Mustard – Blister Agent
HE	High Explosive
HN	Nitrogen Mustard
HTW	Hazardous Toxic Waste
IA	Institutional Analysis
IC	Institutional Controls
IDW	Investigation-Derived Waste
L	Lewisite
LAWP	Local Approved Work Plan
MCE	Maximum Credible Event
MEC	Munitions and Explosives of Concern
MINICAMS	Miniature Chemical Agent Monitoring System
MSL	Mean Sea Level
mV	Millivolt
NCP	National Contingency Plan
NDAI	No DoD Action Indicated
nT	Nanotesla
PDS	Personal Decontamination Station
PID	Photoionization Detector

LIST OF ACRONYMS AND ABBREVIATIONS

PMNSCM	Product Manager for Non-Stockpile Chemical Materiel
PPE	Personal Protective Equipment
ppb	Parts Per Billion
ppm	Parts Per Million
QC	Quality Control
RAC	Risk Assessment Code
RCWM	Recovered Chemical Warfare Materiel
RTC	Replacement Training Center
RTK	Real-Time Kinetic
RV	Recreational Vehicle
SAP	Sampling and Analysis Plan
SARA	Superfund Amendments and Reauthorization Act
SSS	Site Safety Submission
SUXOS	Senior UXO Supervisor
SVOC	Semivolatile Organic Compound
TBC	To Be Considered
TCE	Trichloroethylene
TEC	Topographic Engineering Center, USACE
TEU	U.S. Army Technical Escort Unit
TPP	Technical Project Planning
TWA	Time-Weighted Average
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USAESCH	U.S. Army Engineering and Support Center, Huntsville
USATCES	U.S. Army Technical Center of Explosives Safety
UTC	Unit Training Center
UXO	Unexploded Ordnance
VOC	Volatile Organic Compound
WP	White Phosphorus
XSD	Halogen-Specific Detector

GLOSSARY

Action Memorandum

Approves time-critical removal action and also concludes the engineering evaluation/cost analysis. Provides a concise, written record of the decision to select an appropriate response action. As the primary decision document, it substantiates the need for a response action, identifies the proposed action, and explains the rationale for the response action selected.

Anomaly

Any item that is seen as a subsurface irregularity after geophysical investigation. This irregularity should deviate from the expected subsurface ferrous and non-ferrous material at a site (i.e., pipes, power lines, etc.).

Archives Search Report (ASR)

A detailed investigation to report on past OE activities conducted on an installation. The principal purpose of the Archives Search is to assemble historical records and available field data, assess potential ordnance presence, and recommend follow-up actions at a DERP-FUDS. There are four general steps in an Archives Search: records search phase, site safety and health plan, site survey, and archives search report including risk assessment.

Chemical Agent

Chemical Agent is a chemical compound (to exclude experimental compounds) that, through its chemical properties, produces a lethal or other damaging effects on human beings and is intended for use in military operations to kill, seriously injure, or incapacitate persons through its physiological effects. Excluded are research, development, testing, and evaluation (RDT&E) solutions; riot control agents; chemical defoliants and herbicides; smoke and other obscuration materials; flame and incendiary materials; and industrial chemicals.

Chemical Agent Contaminated Media

Chemical Agent Contaminated Media is any material that is contaminated with chemical agent or agent break down products. This can include residual soil contamination and 3X items determined to contain residual chemical agent or agent breakdown products.

Chemical Warfare Materiel (CWM)

Items generally configured as a munition containing a chemical compound that is intended to kill, seriously injure, or incapacitate a person through its physiological effects. CWM includes V- and G-series nerve agents or H-series (mustard) and L-series (Lewisite) blister agents in other-than-munition configurations; and certain industrial chemicals [e.g., hydrogen cyanide (AC), cyanogen chloride (CK), or carbonyl dichloride (called phosgene or

GLOSSARY (CONTINUED)

CG)) configured as a military munition. Due to their hazards, prevalence, and military-unique application, chemical agent identification sets (CAIS) are also considered CWM. CWM does not include riot control devices; chemical defoliants and herbicides; industrial chemicals (e.g., AC, CK, or CG) not configured as a munition; smoke and other obscuration-producing items; flame- and incendiary-producing items; or soil, water, or other debris or other media contaminated with low concentrations of CA where no CA hazards exist.

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)

CERCLA authorizes federal action to respond to the release or threatened release of hazardous substances into the environment or a release or threat of release of a pollutant or contaminant into the environment that may present an imminent or substantial danger to public health or welfare.

Defense Environmental Restoration Program (DERP)

Established in 1984, DERP promotes and coordinates efforts for the evaluation and cleanup of contamination at Department of Defense installations. (10 U.S.C. 2701)

Depot Area Air Monitoring System (DAAMS)

A portable air-sampling unit, designed to draw a controlled volume of air through a glass tube filled with a collection material. After a specified length of time and flow rate, the tube is removed and sent to a chemical laboratory for analysis (approximately 1 hour process time) to determine the presence, type, and quantity of agent collected in the samples. This technique will sample down to the AEL and provides low-level detection capability for GA, GB, HD, and VX.

Electromagnetic Method

A method of geophysical exploration in which the magnetic and/or electrical fields associated with subsurface currents are measured. The two primary techniques applied during OE and CWM investigations are the time-domain electromagnetic (TDEM) method and the frequency-domain electromagnetic (FDEM) method. Both methods use man-made sources. In the case of TDEM, a pulsed source that is composed of many frequencies is used to generate a source field while the local ground response to that field is monitored using a receiver antenna. In the case of FDEM, the source is a constant frequency and the receiver is tuned to measure the ground response to that frequency.

GLOSSARY (CONTINUED)

Exclusion Zone (EZ)

A safety zone established around a work area. Only authorized project personnel are allowed within the exclusion zone. Examples of exclusion zones are safety zones around MEC intrusive activities and safety zones where MEC is intentionally detonated. (DDESB-KO, 27 January 1990)

Formerly Used Defense Sites (FUDS)

A facility or site (property) that was under the jurisdiction of the Secretary of Defense and owned by, leased to, or otherwise possessed by the United States at the time of actions leading to contamination by hazardous substances. By the DERP policy, the FUDS program is limited to those real properties that were transferred from DoD control prior to 17 October 1986. FUDS properties can be located within the 50 States, District of Columbia, Territories, Commonwealths, and possessions of the United States.

Geophysical Techniques

Methods used to explore subsurface conditions using quantitative physical properties. Typical properties measured include seismic wave travel time and waveform changes, electrical potential differences, magnetic and gravitational field strength, temperature, etc. For MEC and CWM investigations, electromagnetic and magnetic methods are most frequently used.

Headspace

Headspace is done using a closed, sealed container, where items suspected of being CWM related are placed for testing. The items are placed in the container and the container is either heated from an outside source or allowed to heat by solar conduction. The vapors inside the box are monitored through a sampling port for indications of chemical agent.

Intrusive Activity

An action involving or resulting in the penetration of the ground surface at an area known or suspected to contain OE. Intrusive activities can be of an investigative or removal action nature.

Maximum Credible Event (MCE)

A realistic worst-case event that could occur at any time, with maximum release of a chemical agent from a munition, container, or process as a result of unintended, unplanned, or accidental occurrence. (HQDA Interim Guidance for Biological Warfare Materiel (BWM) and Non-Stockpile Chemical Warfare Materiel (CWM) Response Activities).

GLOSSARY (CONTINUED)

Military Munitions

Military munitions means all ammunition products and components produced for or used by the Armed forces for national defense and security, including ammunition products or components under the control of the Department of Defense, the U.S. Coast Guard, the Department of Energy, and the National Guard. The term includes confined gaseous, liquid, and solid propellants; explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries, including bulk explosives and CAs; chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof.

The term does not include wholly inert items, improvised explosive devices, and nuclear weapons, nuclear devices, and nuclear components other than non-nuclear components of nuclear devices, managed under the nuclear weapons program of the Department of Energy after all required sanitization operations under the Atomic Energy Act of 1954 (42 U.S.C. 2011 et Seq.) have been completed. [10 U.S.C. 101(e)(4)(A) through (C)].

Miniature Chemical Agent Monitoring System (MINICAMS)

An automatic air monitoring system that collects compounds on a solid sorbent trap, thermally desorbs them into a capillary gas chromatography column for separation, and detects the compounds with a Flame Photometric Detector (FPD) or Halogen Specific Detector (XSD). It is a lightweight; portable, low-level detector designed to respond in less than fifteen minutes with alarm capability.

Munitions and Explosives of Concern (MEC)

This term, which distinguishes specific categories of military munitions that may pose unique explosives safety risks, means: (1) unexploded ordnance (UXO) as defined in 10 U.S.C. 101(e)(5)(A) through (C), (2) discarded military munitions (DMM) as defined in 10 U.S.C. 2710(e)(2), or (3) munitions constituents (e.g., TNT, RDX) as defined in 10 U.S.C. 2710(e)(3), present in high enough concentrations to pose an explosive hazard.

National Oil and Hazardous Substance Pollution Contingency Plan (NCP)

Revised in 1990, the NCP provides the regulatory framework for responses under CERCLA. The NCP designates the Department of Defense as the removal response authority for ordnance and explosives hazards.

Non-Stockpile Chemical Warfare Material

CWM (see definition) that is not included in the chemical stockpile. Non-stockpile CWM is divided into five categories: buried CWM, recovered chemical weapons (items

GLOSSARY (CONTINUED)

recovered during range clearing operations, from chemical burial sites, and from research and development testing), former chemical weapon production facilities, binary chemical weapons, and miscellaneous CWM (unfilled munitions and devices and equipment specially designed for use directly in connection with employment of chemical weapons). (HQDA Interim Guidance for Biological Warfare Materiel (BWM) and Non-stockpile Chemical Warfare Materiel (CWM) Response Activities).

Photoionization Detector (PID)

A portable instrument used to detect, measure, and provide a direct reading of the concentration of a variety of trace gases based on the principle of photoionization. The process involves the absorption of ultraviolet light by a gas molecule leading to ionization.

Recovered Chemical Warfare Materiel (RCWM)

Non-stockpile CWM that was previously discarded, buried, or fired, and discovered unexpectedly or during planned environmental restoration operations. Chemical warfare agent in soil and debris is not considered RCWM.

Removal Action

Removal actions generally have limited objectives and typically are short-term actions to mitigate the threat posed by a release or a threatened release of hazardous substances. The removal action process cannot attain the Remedy-in-Place or Response Complete milestones and cannot be used to make closeout decisions. Examples include installing of barriers such as fences to prevent human access, installing drainage controls to prevent exposure of hazards by erosion, removing MEC and CWM in other than munitions configurations [e.g., DoD laboratory vials, Chemical Agent Identification Sets (CAIS), 1-ton containers, CA-contaminated soil], and removing other containers that may contain hazardous substances.

Response Action

Action taken instead of or in addition to the removal of OE to prevent or minimize the release of OE so that it does not cause substantial danger to present or future public health or welfare or the environment. (ER 1110-1-8153).

Stakeholder

Federal, state, and local officials, community organizations, property owners, and others having a personal interest or involvement, or having a monetary or commercial involvement in the real property which is to undergo an OE response action.

GLOSSARY (CONTINUED)**Unexploded Ordnance (UXO)**

Military munitions that have been primed, fuzed, armed, or otherwise prepared for action, and have been fired, dropped, launched, projected or placed in such a manner as to constitute a hazard to operations, installation, personnel, or material and remain unexploded either by malfunction, design, or any other cause (40 CFR 266.201).

3X (XXX)

An agent symbol with three "Xs" (XXX) indicates that the item has been surface decontaminated by locally approved procedures, bagged or contained in an agent-tight barrier, of sufficient volume to permit sample air to be withdrawn without being diluted with incoming air, and/or appropriate tests/monitoring have verified that concentrations above 0.0001 mg/m³ for agent GB, 0.00001 mg/m³ for agent VX, 0.003 mg/m³ for H or L, or 0.00003 mg/m³ for agent GD (Unmasked worker AEL values for other covered chemicals) do not exist. Monitoring is not required for completely decontaminated and disassembled parts that are shaped simply (no crevices, threads, or the like) and are made of essentially impervious materials (such as simple lab glassware, and steel gears).

EXECUTIVE SUMMARY

ES1 The former Camp Sibert was comprised of more than 37,000 acres in Etowah and St. Clair Counties, Alabama. The former Camp was used by the U.S. Army as a Chemical Warfare Service Training Area between 1942 and 1945. Training included basic military operations, as well as training in the use of chemical weapons, chemical agent decontamination procedures, and smoke operations. Mustard and other chemical agents were used in the training at the former Camp Sibert. Several types and caliber of conventional weapons were also used during training, with the 4.2-inch mortar being the heavy weapon used most. Camp Sibert was declared surplus after World War II and after decontamination of various ranges and toxic areas in 1948, the land was declared excess and transferred back to private and local government ownership.

ES2 In 1993, the U.S. Army Corps of Engineers (USACE), St. Louis District conducted a site inspection and archives search for the former Camp Sibert. A Risk Assessment Code (RAC) scoring was performed as part of the Archives Search Report (ASR) and resulted in a RAC score of 1. A RAC score of 1 corresponds to the greatest level of risk for the RAC scoring process and was given because as a former Chemical Warfare Service Training area, personnel reportedly used large amounts of chemical agents during training. Moreover, interviews and the ASR site survey suggested that some agents may remain at the site.

ES3 Based on previous site studies, archives searches, and interviews, thirteen sites within the former Camp Sibert property were suspected to be potential chemical warfare materiel (CWM) disposal locations. A Determination of the Applicability of Interim Guidance for Former Camp Sibert (January, 2002) was prepared by the U.S. Army Engineering and Support Center, Huntsville (USAESCH) and identified the sites with a low probability for the presence of CWM. Specifically, the USAESCH concluded that four of the thirteen sites exhibit an unlikely or seldom probability for encountering CWM, or a likely probability of encountering agent contaminated soil or equipment. Two of the thirteen sites exhibit an unlikely or seldom probability for CWM and a likely probability for encountering agent contaminated soil or equipment. Parsons conducted a Phase I Engineering Evaluation/Cost Analysis (EE/CA) at five of these sites in the summer of 2002. The sixth site (Site 2A) was not investigated as part of the Phase I EE/CA as it was later thought to have a potentially higher likelihood of encountering CWM and the investigation would be required to be completed under an approved Chemical Safety Submission. However, during the Phase I EE/CA investigation of Site 2B and Site 2B Alternate, soil samples were collected at predetermined soil boring locations within Site 2A. The results of the soil samples collected at Site 2A were not included in the Phase I EE/CA report but are covered in this Phase II EE/CA report.

ES4 The Parsons Camp Sibert Phase I EE/CA was completed in 2002 and the 5 sites investigated included Site 2B/2B Alternate (Site 2B): Chemical Landmine Training Area, Site 8: Toxic Munitions Impact Area, Site 9: 4.2-inch Mortar Range, Site 13: Possible Contaminated Equipment Burial Site, and Site 14: Possible Munitions Burial Area. These sites were investigated using geophysical methods, soil sampling and analysis, and excavation to determine the nature and extent of CWM. One phosgene-filled, 4.2-inch mortar round was recovered and destroyed at Site 8 which led to further geophysical mapping in November 2002 and a removal action. No residual chemical agent or agent degradation products were detected in the soils at Site 8 during the Phase I investigation and no evidence of CWM was encountered at Sites 2B, 9, 13, and 14. The recommendations for Sites 2B, 9, 13, and 14 was No Department of Defense Action (NDAI) for CWM.

ES5 The purpose of the Phase II EE/CA is to complete characterization of the remaining CWM sites identified at the former Camp Sibert, determine the nature and extent of CWM, assess the risk posed by any remaining CWM, study risk management alternatives, and identify the appropriate response action to address any identified risks to the public. Eight sites were investigated during the Phase II EE/CA which included geophysical methods, soil sampling and analysis, and excavation.

ES6 No evidence of CWM was encountered or residual chemical warfare agent was detected at Site 6: Chemical Filling Area, Site 11/11A: Possible Munitions Burial Area, Site 15: Possible Munitions Burial Area, and Site 16: Air Operations Filling Area. Site 3: Former Gas Yard and Burial Site - Tract D340 was not completely investigated because right of entry documentation was denied by one of the property owners. Site 4: Toxic Gas Yard was partially investigated because the right of entry was retracted during the intrusive investigation. Site 12: Smoke Generator and Possible Munitions Burial Area was not investigated because right of entry was denied for the entire site.

ES7 The investigation of Site 2A: Chemical Munitions Burial Area - Tract C230 included intrusive investigation of suspect burial areas and soil sampling. Three known burial pits that had been decontaminated in 1948 were not investigated as their extent could be distinguished from the geophysical surveys and historical documentation. Although no CWM-related scrap was discovered at Site 2A during this investigation, a soil sample collected at the eastern trench wall at Anomalous Area 2A-GA-G (former Soakage Pit Area) contained a detectable amount of mustard agent. Based on the findings of this investigation, review of documentation on the three known burial pits, and the development of this property for residential use, a removal action for potential agent contaminated media and land use controls are recommended at Site 2A. This removal action includes the three known burial pits and the location of the former Soakage Pit Area.

ES8 Based on the historical documentation and sampling conducted during this EE/CA, No Department of Defense Action Indicated (NDAI) for CWM is recommended for Sites 6, 11/11A, 15, and 16. Since Sites 3, 4, and 12 could not be fully investigated, they cannot be evaluated. As discussed previously, a removal action and land use controls

was recommended for Site 2A. All of these sites, including the sites recommended for no action, will be further addressed in the Camp Sibert RI/FS prior to project closeout.

ES9 The cost for the removal action response alternative at Site 2A is estimated to be \$6,946,200 combined for the contractor, support agencies, USAESCH and USACE Mobile District. The recommended land use controls include both site-specific and site-wide land use controls. The land use controls specific to Site 2A include a permit program, while the site-wide land use controls include printed media; audio/visual media awareness program; classroom education. The initial cost to implement the site-specific land use controls is approximately \$9,000. The costs associated with implementing the site-wide land use controls were included in the Phase I CWM EE/CA.

SECTION I INTRODUCTION

1.1 BACKGROUND

1.1.1 Project Authorization

1.1.1.1 Parsons received Contract DACA87-00-D-0038, Delivery Order 0029, from the U.S. Army Engineering and Support Center, Huntsville (USAESCH) to conduct an Engineering Evaluation/Cost Analysis (EE/CA) for potential chemical warfare materiel (CWM) and, if co-located, munitions and explosives of concern (MEC) waste at eight sites at the former Camp Sibert, located in Etowah and St. Clair Counties, Alabama. The U.S. Army Corps of Engineers, Mobile District (CESAM) was the District Project Manager for this project. This EE/CA was conducted under the Defense Environmental Restoration Program (DERP) for Formerly Used Defense Sites (FUDS).

1.1.1.2 The EE/CA at the former Camp Sibert is being conducted in three phases. The Phase I EE/CA was conducted under the Local Approved Work Plan (LAWP) on the initial 5 of 13 suspect CWM sites (Parsons, 2002a). The Final Phase I EE/CA Report was submitted in June 2005 and revised in March 2006 (Parsons, 2006). This document is the Phase II EE/CA that was conducted on 8 of 13 suspect CWM sites at the former Camp Sibert. The Phase II EE/CA investigation was completed under the Site Safety Submission (SSS) prepared by Parsons for the USAESCH and approved by the U.S. Army Technical Center for Explosives Safety (USATCES) and Department of Defense Explosives Safety Board (DDESB) (Parsons, 2004). The Phase III EE/CA investigation is ongoing and addresses the conventional munitions concerns at the former Camp Sibert

1.1.2 Regulatory Overview

The actions performed under this contract are consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP). In accordance with the NCP, on-site actions did not require federal, State, or local permits. The EE/CA investigation adhered to the DERP/FUDS and relevant U.S. Army Regulation (AR) and guidance for CWM programs.

1.2 PURPOSE AND SCOPE

1.2.1 Project Purpose

The purpose of this EE/CA was to:

- Characterize the nature and extent of CWM contamination including chemical agent and agent breakdown products (ABPs);
- Assess the risk posed by any CWM, chemical agent or ABPs;
- Study risk management alternatives; and
- Identify the appropriate response alternative and future recurring reviews for the sites at the former Camp Sibert.

1.2.2 Scope and Objectives

1.2.2.1 The Phase II EE/CA focused on suspect CWM sites at the former Camp Sibert not addressed in the Phase I EE/CA. The objectives of this Phase II EE/CA are listed below.

1. Evaluate the historical use and testing of CWM at:
 - Site 2A – Chemical Munitions Burial Site – Tract C230,
 - Site 3 – Former Toxic Gas Yard and Burial Site – Tract D340,
 - Site 4 – Toxic Gas Yard,
 - Site 6 – Chemical Filling Area – Demolitions Area (DA)-5,
 - Site 11 and Site 11A – Possible Munitions Burial Area,
 - Site 12 – Smoke Generator and Possible Munitions Burial Area,
 - Site 15 – Possible Munitions Burial Area, and
 - Site 16 – Air Operations Filling Area.
2. Evaluate the potential presence of CWM, chemical agent, ABPs, and related ordnance that may have resulted from past Department of Defense (DoD) activity.
3. Identify, evaluate, and recommend appropriate response alternatives for each site.
4. Provide cost estimates for the recommended response alternatives.

1.2.2.2 During the Phase II EE/CA field investigation, site characterization efforts involved intrusive excavation, sampling, and data collection.

1.2.2.3 The major work components included the following:

- Reviewed previous reports, documents, and historical records, including the Archives Search Report (ASR) and other data that was available;
- Visually inspected the sites and collected additional relevant data;
- Prepared a Work Plan and Sampling and Analysis Plan (SAP) for the field investigation;
- Re-acquired previously identified geophysical anomalies;

- Located additional sampling locations based on aerial photographic evaluations and historical site uses;
- Performed intrusive investigations of geophysical anomalies and other suspect locations based on results of the re-acquisition effort and historical site information;
- Collected soil samples at selected locations for chemical agent and ABP analysis;
- Prepared a qualitative assessment of risk from CWM and ABPs;
- Provided technical support to the government for meetings and public relations activities;
- Evaluated site investigation results, assessed potential response alternatives, and prepared this EE/CA Report as documentation of all work activities; and
- Provided project management.

1.3 REPORT ORGANIZATION

This report was organized to first present general discussions of the background and purpose of the work performed, as well as the common approaches and procedures used to characterize the sites (Sections 1 to 3). Section 4 discusses the response evaluation process including applicable or relevant and appropriate requirements (ARARs), the qualitative risk evaluation process, and the alternative screening process. Each site where investigations were conducted under this EE/CA is fully addressed in Sections 5 through 12. Section 13 discusses the recurring review, and references are included in Section 14. Supporting information, results, and procedures are provided in the appendices.

1.4 TECHNICAL PROJECT PLANNING (TPP) TEAM

Several organizations had significant responsibilities during the field investigation and development of the Phase II EE/CA report. This project team was primarily composed of the following organizations:

- U.S. Army Corps of Engineers, Mobile District (CESAM);
- U.S. Army Engineering and Support Center, Huntsville (USAESCH);
- U.S. Army Technical Escort Unit (TEU);
- Edgewood Chemical Biological Center (ECBC);
- Product Manager for Non-Stockpile Chemical Materiel (PMNSCM);
- Alabama Department of Environmental Management (ADEM);
- Etowah County Emergency Management Agency (EMA); and
- Parsons (and Subcontractors).

1.4.1 U.S. Army Corps of Engineers, Mobile District (CESAM)

CESAM was the District Project Manager for this project. The goal of CESAM's involvement in this Phase II EE/CA was to satisfy the terms of DERP/FUDS. This included the review of project plans and documents, coordination with State and local regulatory agencies on issues pertaining to implementation of this study, and protection of ecological and cultural resources. CESAM is also responsible for conducting the public affairs program and maintaining the administrative record.

1.4.2 U.S. Army Engineering and Support Center, Huntsville (USAESCH)

The USAESCH was the implementing agency for execution of this project. The USAESCH provided technical expertise for the Phase II EE/CA investigation. The USAESCH responsibilities included procurement of an EE/CA contractor, direction of the EE/CA contractor, field safety oversight, and coordination of document reviews and approvals.

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

The TEU was responsible for conducting CWM hazard containment and abatement within the exclusion zone during intrusive excavation, identification, and recovery operations. During the intrusive excavations no CWM was found. In the event that a CWM item had been found, the TEU would have been responsible for operations in the exclusion zone and would direct the execution of containment, abatement, and recovery operations. Other responsibilities of the TEU included performing recovery, overpacking, transportation, storage operations, and handling of any CWM-related emergency that could occur during operations. If conditions were encountered that appeared to be different from the basis for the maximum credible event (MCE), the TEU would coordinate with the onsite USAESCH Safety Specialist to establish a new MCE before beginning operations in the exclusion zone.

1.4.4 U.S. Army Edgewood Chemical Biological Center (ECBC)

During all intrusive operations, ECBC conducted air monitoring for chemical agents in the exclusion zone. ECBC provided both onsite and offsite analysis for chemical agents and degradation products on soil samples collected from the suspect CWM Sites. All samples that left the site were screened by ECBC to ensure that any chemical warfare agent detected was below airborne exposure limits (AELs) before leaving the site.

1.4.5 Alabama Department of Environmental Management (ADEM)

ADEM has as its mission to adopt and enforce rules and regulations consistent with statutory authority to protect and improve the quality of Alabama's environment and the health of all its citizens. The project team coordinated with ADEM throughout the project. CESAM and USAESCH served as the primary contacts to ADEM and ensured ADEM was informed of project progress.

1.4.6 Etowah County Emergency Management Agency (EMA)

The Etowah County EMA provided various resources and support to the project team during this EE/CA investigation. As a service, the Etowah County EMA provided emergency weather equipment, current aerial photographs, and the use of their facilities for meetings as needed throughout the project. These resources were used in planning for operations at the former Camp Sibert.

1.4.7 Parsons

As the prime contractor, Parsons was responsible for executing all aspects of the EE/CA investigation outlined in the Scope of Work. Parsons conducted the EE/CA investigation in accordance with the applicable Data Item Descriptions (DIDs).

1.4.8 Subcontractors

1.4.8.1 Parsons procured the services of USA Environmental, Inc. to provide the investigation team with qualified unexploded ordnance (UXO) technicians to assist with field operations in conjunction with Parsons personnel. Additionally, USA Environmental provided the Senior UXO Supervisor (SUXOS) for the EE/CA field investigation.

1.4.8.2 Severn Trent Laboratories was contracted to perform arsenic and chloride analysis on selected soil samples collected during this EE/CA field investigation.

1.4.8.3 Jones, Blair, Waldrup, and Tucker, Inc. of Gadsden, Alabama, provided surveying services to locate the geophysical grids, soil borings, and trenches.

1.4.8.4 Anniston Emergency Medical Services provided an onsite ambulance and paramedics trained to handle potential exposure of personnel to chemical agents during the intrusive investigations at the former Camp Sibert. The paramedics also monitored site workers for signs of stress (body temperature, heart rate, etc.) during the daily site operations, in accordance with the Site Safety and Health Plan (SSHP), Part IV of the SSS.

SECTION 2

SITE DESCRIPTION AND HISTORY

2.1 PROJECT LOCATION

2.1.1 The former Camp Sibert is located in northeastern Alabama in the Canoe Creek Valley between Chandler Mountain and Red Mountain to the northwest, and Canoe Creek, Hopewell Mountain, and Dunaway Mountain to the southeast (Figure 2.1). Interstate 59 (I-59) runs through the former Camp Sibert, and U.S. Highway 411 (US 411) parallels the former camp to the southeast. The Gadsden Municipal Airport occupies the north central portion of the site. The City of Gadsden is encroaching towards the former camp boundaries from the northeast. Also, in the northern half of the site, Rainbow City on the east and the City of Attalla on the west are encroaching the site. Industry is encroaching on the southern portion of the former Camp Sibert near the Town of Steele, but most of the former installation remains rural.

2.1.2 Secondary roads connect the various parts of the former Camp Sibert. The property, comprised mainly of sparsely inhabited Alabama farmland and woodland, consisted of 37,035 acres in a tract approximately 14 miles long and 5 ½ miles wide.

2.1.3 Based on previous site studies, archives searches, and interviews, thirteen sites within the former Camp Sibert property were suspected to be potential CWM disposal locations. Based on the USAESCH Applicability to Interim Guidance it was concluded that the Interim Guidance was not applicable to five sites which were determined to present a low likelihood for the CWM. Those five sites were investigated under the Local Approved Work Plan during the Phase I EE/CA in 2002. The remaining eight sites addressed by this report include:

- Site 2A – Chemical Munitions Burial Site – Tract C230;
- Site 3 – Former Toxic Gas Yard and Burial Site – Tract D340;
- Site 4 – Toxic Gas Yard;
- Site 6 – Chemical Filling Area – DA-5;
- Site 11 / 11A – Possible Munitions Burial Area;
- Site 12 – Smoke Generator and Possible Munitions Burial Area;
- Site 15 – Possible Munitions Burial Area; and
- Site 16 – Air Operations Filling Area.

2.1.4 The site names indicated above were assigned during the archives search phase of the document review and do not necessarily represent the true use of the sites or items found at the sites. Figure 2.2 shows the locations of each of the eight sites. The “munitions” referred to in the titles of these suspect sites originated from the titles

assigned to these sites in the ASR. These "munitions" are considered to be containers and not explosively-configured munitions.

2.2 PHYSICAL DESCRIPTION

2.2.1 Geology

The former Camp Sibert lies in the southern portion of the Valley and Ridge Physiographic Province. The Valley and Ridge Province is a northeast trending narrow belt of faulted and folded dominantly calcareous Paleozoic rocks. It extends for 1200 miles from the St. Lawrence Valley to the Gulf Coastal Plain in Alabama. The Valley and Ridge is characterized by valleys that are underlain by limestones and dolomites with ridges that are more resistant to weathering and are capped by sandstones and cherty limestones and shales. Locally, the bedrock geology of the area consists of the Cambrian Conasauga Formation, which is a medium-blue-gray, fine-grained argillaceous limestone interbedded with dark gray shale.

2.2.2 Topography, Soils, and Vegetation

2.2.2.1 The former Camp Sibert lies in the foothills of the Southern Appalachian Mountains. The Coosa River and Neely Henry Lake are located on the east side of St. Clair and Etowah counties and are immediately southeast of the mountains (Figure 2.1). The general topography within the former Camp Sibert area is dissected by rolling, hilly uplands and flat lowlands. Elevation relief ranges from approximately 515 feet mean sea level (MSL) in the valley to over 1040 feet MSL at Hopewell Mountain along the eastern boundary of the site. In the northern portion of the site, drainage is to the northeast into Horton Creek. Throughout the remainder of the site, drainage is generally toward the southeast into Canoe Creek.

2.2.2.2 According to the Soil Survey of St. Clair and Etowah Counties, Alabama, former Camp Sibert lies within the Limestone Valleys and Uplands soil area of Alabama. Soils in this area were formed mainly in residuum weathered from limestones. Soils of the Tennessee and Coosa River valleys were weathered from pure limestones and are mainly red clayey soils with silt loam surface textures. Most of the soils of the uplands are derived from cherty limestones. Bodine and Fullerton soils are extensive in many of these landscapes. They typically have a gravelly loam and gravelly clay subsoil and a gravelly silt loam surface layer.

2.2.2.3 Etowah County is approximately 68% timberland and St. Clair County is approximately 75% timberland, much of which is in nonindustrial private or corporate ownership. Most of this timberland is comprised of the oak and hickory forest types. Other forest types include loblolly and short leaf pine, chestnut, walnut, and other hardwoods (USFWS, 2000). Presently, the area that is the former Camp Sibert is mostly rural with approximately 40 percent of the land existing as forests and 60 percent of the land as open field and pasture.

2.2.2.4 The U.S. Fish and Wildlife Service lists 97 animal species and 18 plant species as threatened or endangered in Alabama. There are nine (9) federal listed species

known to exist in St. Clair County, and 13 federal listed species known to exist in Etowah County, according to the U.S. Fish and Wildlife Service (USFWS, 2002).

2.2.3 Climate

The former Camp Sibert is situated in a temperate, humid climate. Summers are hot and long, whereas winters are generally short and mild to moderately cold. The mean annual temperature is approximately 61 degrees Fahrenheit (°F). The mean temperature in winter is 43°F, and August is the warmest month with an average temperature of 85°F. Precipitation averages 51 inches per year in St. Clair and Etowah Counties.

2.3 DEMOGRAPHICS

2.3.1 St. Clair County encompasses 634 square miles in northeastern Alabama, and Etowah County covers 535 square miles. The U.S. Census Bureau reports the population to be 66,402 in St. Clair County and 103,014 in Etowah County in 2001. Gadsden is the largest city within Etowah County with a population of 38,978 (Gadsden IDA, 2002). The majority of Etowah County (14.3%) and St. Clair County (16.4%) residents are between the ages of 35 and 44 years. Approximately 83% of residents in Etowah County and 90% of residents in St. Clair County are Caucasian (U.S. Census Bureau, 2002).

2.3.2 Major employers in Etowah County include Goodyear (1200 employees), Tyson foods (1200 employees), Gadsden Regional Medical Center (1100 employees), the Etowah County Board of Education (1100 employees), and the Riverview Regional Medical Center (900 employees). Between 1990 and 2000, St. Clair County experienced approximately 30% growth to become the sixth fastest growing county in Alabama, with major employers including the Saks Fifth Avenue Distribution Center, Yachiyo Manufacturing of Alabama, Thomas & Betts (formerly Southern Monopole), Sumitomo Electric, Nissin International, Safety Wear, Preferred Sourcing, and Industrial Galvanizers of Birmingham (Census Scope, 2002). Noccalula Falls Park in Gadsden, pre-civil war homes, a variety of civil war museums, and the nearby Coosa River are popular recreational attractions in the area.

2.4 SITE HISTORY

2.4.1 The area that would become part of Camp Sibert was selected in the spring of 1942 for use in the development of a Replacement Training Center (RTC) for the Army Chemical Warfare Service. The RTC moved from Edgewood, Maryland to Alabama in the summer of 1942. In the fall of 1942, the Unit Training Center (UTC) was added as a second command. Units and individual replacements were trained in aspects of both basic military training and in the use of chemical weapons, decontamination procedures, and smoke operations from late 1942 to early 1945. Mustard (HD) and other chemical warfare agents were used in the training. This facility provided the opportunity for live agent, large-scale training that had been previously unavailable (Brophy, et al., 1959).

2.4.2 During chemical training, training was conducted using several different types of containers and delivery methods. These include:

- 4.2-inch chemical mortars (with various fillers)
- M1 chemical landmines
- Aerial spray tanks
- 55-gallon drums for bulk storage of chemical agent
- Chemical storage cylinders (1-Ton)

2.4.3 In addition to chemical training, several types and caliber of conventional weapons had been fired at the former Camp Sibert, with the 4.2-inch mortar being the heavy weapon used most in training. Firing ranges at the former Camp Sibert included:

- .30-caliber rifle,
- Machine gun,
- .22-caliber rifle and shotgun,
- .45-caliber sub-machine gun,
- .45-caliber pistol,
- Grenade (rifle and hand grenades),
- 4.2-inch mortar (used for training in the use of white phosphorous [WP] and high explosive [HE] rounds),
- Anti-tank (AT) rocket (bazooka), and
- Anti-aircraft .22-caliber rifle.

2.4.4 Training in areas that were constructed to resemble Japanese pillboxes was also noted among the historical documents. Training in these areas included the use of:

- Grenade launchers (M1),
- Portable flame throwers,
- Thompson sub-machine guns (.45 caliber),
- Carbines (.30 caliber),
- Pistols (.45 caliber),
- Fragmentation and WP grenades,
- Browning automatic rifles,
- 4.2-inch WP mortars, and
- 4.2-inch HE mortars.

2.4.5 The government terminated the leases for the area on December 13, 1946. After decontamination of various ranges and toxic areas in 1948, the land was declared excess and transferred back to private and local government ownership. The U.S. Army TEU undertook several cleanup operations during 1947 and 1948 in selected areas, but chemical agents and conventional ordnance may still exist in several locations.

2.4.6 An accidental detonation of a mortar round occurred at the former Camp Sibert in June 1948. According to reports, the burns received by the driver and passenger of a pickup truck were consistent with mustard agent burns. Although the actual detonation occurred just outside of the former Toxic Munitions Impact Area (Site 8), the item was believed to have been transported from where it was originally found.

2.4.7 Since 1949, most of the property has been privately owned and either farmed or left as woodlands. The former post airfield is now the Gadsden Municipal Airport and the City of Gadsden has expanded into the area of the airport. The barracks area was developed into single-family housing and several industrial facilities are in operation in the former Camp Sibert industrial area. The maneuver and training areas, which comprise the majority of the land area, are used for residences, grazing, forestry, and agriculture.

2.5 CURRENT AND FUTURE LAND USE

2.5.1 The majority of the former Camp Sibert is undeveloped and sparsely populated. Although the number of residents living in the area is low, additional residential, commercial, and industrial development in the future is anticipated. In developed areas, the predominant land use is agricultural, with a majority of the area being used for cattle grazing. A large portion of the site is forested; however, there are no known forestry operations.

2.5.2 Table 2.1 presents a summary of the current and anticipated future land use for each of the sites. Figure 2.3 is a map of the current land use for the former Camp Sibert area that was prepared as part of a corridor study by Etowah County and was provided during interviews conducted for the Phase I CWM EE/CA Institutional Analysis Report.

Table 2.1
Summary of Current and Future Land Use

Site	Size (acres)	Current Owner	Jurisdiction	Current Land Use	Future Land Use
2A	32	Private Ownership	Etowah County	Residential/ Agricultural	Residential/ Agricultural
3	22	Private Ownership,	Rainbow City	Agricultural/ Residential	Residential/ Agricultural
4	4.5	Private Ownership	Etowah County	Residential	Residential
6	16	Private Ownership	Etowah County	Forested	Residential
11/11A	32.2	Private Ownership	Rainbow City	Residential/ Commercial/ Forested	Residential/ Commercial/ Forested
12	8	Private Ownership	Rainbow City	Residential/ Agricultural	Residential/ Agricultural
15	4	Alabama DOT	Etowah County / City of Gadsden	Forested/ Transportation	Forested/ Transportation
16	9.5	Private Ownership	Rainbow City	Agricultural	Agricultural

2.6 PREVIOUS INVESTIGATIONS

Previous investigations have been conducted on all or part of each site that is addressed by this Phase II EE/CA. Most of these have been limited to record searches, interviews, surface assessments, and generally non-intrusive activities. A summary of those investigations relevant to the sites addressed in this Phase II EE/CA are described in the following sub-sections.

2.6.1 1990 Confirmation Study

In 1989, Environmental Science & Engineering, Inc. (ESE) began a site investigation, under the direction of the CESAM, at four areas within the former Camp Sibert installation. Soil and groundwater sampling was conducted at these sites. The results of this investigation were documented in the report, Confirmation Study of the Camp Sibert, Gadsden, Alabama (ESE, 1990).

2.6.2 1993 Site Survey of Formerly Used Defense Sites

In 1993, ESE conducted a site survey of the former Camp Sibert. This site survey included a site visit with documentation by photographs, video, and field notes. The preliminary data collected during this survey were included in a report dated October 1993 (ESE, 1993) and was used by ESE to conduct the subsequent site characterizations.

2.6.3 1993 Archives Search Report

In 1993, the U.S. Army Corps of Engineers (USACE), St. Louis District conducted a site inspection and archives search of the former Camp Sibert. The final reports, dated July 1993 and December 1993, outlined the site history, site description, real estate ownership information, results of a visual site inspection and interviews, and evaluation of potential ordnance contamination based on site information and archives search. The sites addressed by these reports included all of those being addressed by this Phase II EE/CA Report. The reports included the ASR Findings (USACE, 1993a) and the ASR Conventional Ordnance Addendum (USACE, 1993b).

2.6.4 1995 Phase I Site Characterization

In 1995, ESE conducted a Phase I site characterization for suspect CWM sites at the former Camp Sibert. This study included geophysical surveys but did not include intrusive sampling at the sites. The final report, dated March 1995, outlined the results of the non-intrusive work as well as additional archives search information, and made recommendations for either intrusive excavation or additional geophysical investigations (ESE, 1995a).

2.6.5 1995 Phase II Site Characterization

In 1995, ESE conducted a Phase II site investigation to further address some of those sites identified during the Phase I effort as well as other suspect conventional ordnance sites. The Phase II site investigation included both intrusive investigation of suspect areas and geophysical surveys of additional sites identified in the ASR. The draft report, dated January 1995 (ESE, 1995b), summarized the results of this investigation.

2.6.6 1996 Site Investigation Report

Beginning in 1994, Metcalf and Eddy, Inc. conducted site investigations at four sites on the former Camp Sibert. The investigation included soil and water sampling for hazardous and toxic waste at each of the four sites. The final report, dated December 1996, outlined the results of the investigations and conclusions and recommendations for each site (Metcalf and Eddy, 1996).

2.6.7 1997 Site Visits and Record Search/Review

2.6.7.1 On December 2 and 3, 1997, a two-day project meeting and site visit was conducted by Parsons in Gadsden, Alabama. The meeting objectives were to review past information about the suspect CWM sites at the former Camp Sibert and to visit the sites to familiarize the teams with the site conditions and locations.

2.6.7.2 In addition, a record search was performed by an archivist at the National Archives located in College Park, Maryland. The purpose of this search was to examine potentially relevant documents identified by ESE in 1995 (ESE, 1995a) during a previous records search. This search was also conducted to identify any additional information pertaining to the former Camp Sibert and possible burial sites containing CWM. The results of this search are described in the LAWP (Parsons, 2002a).

2.6.8 1999 Geographical Information System (GIS)-Based Historical Time Sequenced Analysis

In November 1999, the U.S. Army Engineer Research and Development Center, Topographic Engineering Center (TEC) conducted an aerial photographic analysis for the entire former Camp Sibert property. The TEC analysis identified numerous suspect ground disturbances and possible burial sites that may indicate the potential presence of CWM- or MEC-related items. The features identified included ground scars, trenches, and potential training-related areas. The analysis was primarily based on the interpretation of black and white aerial photographs of the project area from 1939 through 1950. Approximately 215 stereo-paired photographs were used in this analysis.

2.6.9 Phase I CWM EE/CA

2.6.9.1 Parsons completed a Phase I CWM EE/CA (Parsons, 2003) at five sites under a LAWP (Parsons, 2002a). These five sites were selected based on a low probability of finding CWM. The purpose of the Phase I CWM EE/CA was to characterize the nature and extent of CWM, assess the risk posed by any recovered chemical warfare materiel (RCWM), study risk management alternatives, and identify the appropriate response action to address any identified risks to the public.

2.6.9.2 No residual chemical agent or ABPs were detected in the soils at the sites sampled. No evidence of CWM was encountered at four of the five sites fully characterized (Site 2B – Chemical Landmine Training Area, Site 9 – 4.2" Mortar Range, Site 13 – Possible Contaminated Equipment Burial Site, and Site 14 – Possible Munitions Burial Area). Based on the historical documentation and sampling conducted during this Phase I CWM EE/CA, No Department of Defense Action Indicated (NDAI) for CWM

was recommended for each of these four sites. CWM in the form of one phosgene-filled 4.2-inch mortar round was recovered and subsequently destroyed at Site 8 – Toxic Munitions Impact Area. A removal action was recommended at Site 8 based upon this finding.

2.6.9.3 A sixth site, Site 2A, was partially investigated during the Phase I CWM EE/CA with soil samples collected from predetermined soil boring locations. The results of the soil samples collected from Site 2A during the Phase I CWM EE/CA were negative for chemical agent, ABPs, and chloride. The intrusive investigation of Site 2A was completed as part of this Phase II EE/CA investigation.

2.6.10 2002 Site 8 Geophysical Investigation

2.6.10.1 A combined 128 acres of the 375-acre site was geophysically mapped during October and November 2002. This acreage was centered on the suspected central impact area of Site 8 and the vicinity of where the 4.2-inch mortar was found. For open areas, a towed-array system was used comprised of three EM61-MK2 high-resolution metal detectors mechanically advanced in tandem. In areas inaccessible to the towed array, a pedestrian-towed EM61-MK2 metal detector was used for data acquisition. A total of 8,673 anomalies were selected from the 128 acres of digital geophysical mapping (DGM). The results of the geophysical investigation are presented in the Site 8 – Geophysical Survey report (Parsons, 2002b).

SECTION 3 SITE INVESTIGATION

3.1 INTRODUCTION

Site investigations in support of this Phase II CWM EE/CA included geophysical surveys; single anomaly excavations, trench and pit excavations; air monitoring, soil sampling and analysis; and surveying of grid boundaries, anomaly locations, and soil boring locations. Where necessary, brush clearing was also conducted. These activities are described in the following sections.

3.2 GEOPHYSICAL SURVEYS

3.2.1 Introduction

3.2.1.1 Geophysical surveys to detect buried metal objects were performed at each of the eight sites as part of the Phase II CWM EE/CA investigation. Surveys were conducted at each site during the fall of 2000 primarily using the EM61. The EM31 was used only at Site 15 where a large dump site was expected.

3.2.1.2 Geophysical coverage at Site 15 was completed with the EM31 and G-858 in November 2004 after the brush clearing was completed on the remaining grids prior to the intrusive efforts.

3.2.2 Location Equipment

3.2.2.1 A differential global positioning system (DGPS) was used to establish the grid corners and transect points and to record the position of the geophysical instrument as part of the meandering path survey. The DGPS consists of 24 U.S. Department of Defense satellites that orbit approximately 11,000 miles above the earth's surface completing full orbits twice per day. The satellites broadcast radio frequencies containing data that are collected by DGPS receivers. Microprocessors and associated software allow DGPS receivers to determine accurate positions on earth.

3.2.2.2 A Leica real-time kinematic (RTK) survey system with sub-centimeter accuracy was used in establishing grid corners and control points. A Leica base station receiver situated at a nearby survey monument was used to communicate via radio signals with the rover receiver set to the same radio frequency. This communication allowed real time centimeter-accurate positions to be captured.

3.2.2.3 A Leica Total Station survey system was also used by the registered surveyor to establish grid corners and transect points, including locations where the DGPS coverage could not be obtained because of thick tree canopy.

3.2.3 Geophysical Prove-Out

A test grid was designed and constructed on private property at the former Camp Sibert, with the consent of the property owner. The test grid was located at Site 2A on the west side of Perman Lake Road. The prove-out compared the performance of the EM61, G-858, and EM31. The results of the 2000 prove-out supported the use of the EM61 as the primary geophysical mapping instrument. Details of the geophysical prove-out are included in Appendix J of the Site Safety Submission (Parsons, 2001). The sections below describe the field procedures and processing used during the 2000 geophysical survey.

3.2.4 Geophysical Survey Equipment

3.2.4.1 Three geophysical methods, time-domain electromagnetics, frequency-domain electromagnetics and magnetics, were used to perform geophysical surveys. The instrumentation used included the Geonics EM61 time-domain metal detector, the Geonics EM31 frequency-domain terrain conductivity meter, and the Geometrics G-858 magnetometer. The EM61 was chosen to be the primary instrument based on the results of the geophysical instrument prove-out. The EM31 terrain conductivity meter and the G-858 magnetometer were also selected for use in limited applications.

3.2.4.2 The G-858 magnetometer has self-oscillating split beam cesium vapor (non-radioactive) sensors that produce signals proportional to the intensity of the ambient magnetic field intensity. The G-858 used at former Camp Sibert had two sensors configured as a vertical gradiometer. The sensitivity of the instrument is 0.05 nT (nanotesla) when reading at a sample rate of ten times per second. Data were recorded internally with the instrument's control console.

3.2.4.3 The EM61 metal detector generates electromagnetic signals that induce eddy currents in the subsurface. When the signal is shut off, the eddy currents decay and induce a secondary magnetic field that is monitored by a receiving coil and recorded by an attached data logger. The system receives the signal at two receiving coils at two separate heights above the ground surface. A distance of 40 centimeters separates the lower and upper coils. The coils measured 0.5 meter by 1.0 meter with the long axis perpendicular to the direction of travel. The EM61 data logger collects data at automatic time intervals determined by the user or at a pre-programmed distance interval measured by an attached set of wheels with all-terrain tires.

3.2.4.4 The EM31 terrain conductivity meter uses a fixed-frequency transmitting antenna to generate an electromagnetic field. A receiving antenna measures the response of the instrument's surroundings to the electromagnetic field. Two components of the responding signal are recorded: the out-of-phase response and the in-phase response. The out-of-phase response is tuned to be proportional to the apparent conductivity. The in-phase response tends to respond strongly to local changes in magnetic susceptibility. The instrument is about 12 feet long and is carried with a shoulder strap that is positioned over the shoulder. A digital data recorder is used to gather the data at about a one second interval. The slow sample rate and large sample volume of the EM31 make it suitable for

locating large burial sites but unsuitable for detecting and resolving small items such as buried MEC.

3.2.5 Grid and Transect Preparation

3.2.5.1 Most geophysical surveys were conducted on pre-established grids. The locations of the grids were chosen in advance based on aerial photographic analysis and an evaluation of the history of the individual sites. Grids were chosen so that they were oriented parallel to the primary compass ordinates. Transects were cleared through wooded areas as a series of straight-line segments.

3.2.5.2 The surveying firm Jones, Blair, Waldrup and Tucker, Inc. of Gadsden, Alabama established the locations of grids and transects. The southwest corner of each grid (or group of grids) was assigned as the origin and given the local x and y coordinates of 0 North and 0 East. All grid coordinates were in units of feet and each individual grid size was 100 feet by 100 feet. Survey rebar was placed at the four corners of each individual grid for relocation with a metal detector. For a group of grids, rebar was placed only at the outer corners. Wooden stakes were placed at all interior grid corners and the survey for all grid corners and transect points used Alabama East State Plane NAD83 coordinates.

3.2.5.3 Many grids and transects were covered by thick vegetation. In order to conduct the geophysical surveys, it was necessary to cut and remove as much vegetation as possible from the areas to be surveyed. Trees, shrubs, branches and other vegetation were removed by a combination of clearing teams with chain saws and power cutters and land clearing machines. In general, trees more than 3 inches in diameter were left although the lower branches were removed. Vegetation was either piled off the grids or, in most cases, mulched by the land-clearing machine.

3.2.5.4 Both the surveying and vegetation clearing activities were supported by UXO-qualified escorts who scanned the ground surface for MEC items and used hand-held Schonstedt metal detectors to scan the locations for survey stakes and for buried metal.

3.2.6 G-858 Surveys

3.2.6.1 The Geometrics G-858 magnetometer was set up as a vertical gradiometer (two sensors mounted one above the other) with the sensors separated by 24 inches. The instrument checkout was conducted in an area free from cultural interferences.

3.2.6.2 The data presented in this report were collected while using the G-858 in the simple survey mode using an automatic logging interval of 0.1 seconds. The cesium vapor sensors were mounted on an aluminum frame that carried the sensors approximately 3 feet in front of the operator, in the standard G-858 survey configuration.

3.2.6.3 While data were being recorded, markers at 50-foot intervals were inserted by the operator into the data stream. These markers served to assign appropriate coordinates to the data points during data processing and mapping.

3.2.6.4 The G-858 was used only as supplemental coverage at Site 15. This instrument was chosen over the EM61 because of the need to minimize clearing along transects and because the targets of the survey were large pieces of buried equipment. Large pieces of buried metal would be easily identifiable as a suspect anomaly greater than or equal to the magnetic volume of a modeled target by using the G-858.

3.2.7 EM61 Surveys

3.2.7.1 When used on grids, the instrument operator collected electromagnetic data along survey lines spaced 3 feet apart. The EM61 metal detection data were collected while towing the antenna coils behind the operator and at automatic time intervals in extra fast mode.

3.2.7.2 While surveying, fiducial markers were inserted by the operator into the data at 50-foot intervals across the grid using the data logger. These markers served to assign appropriate coordinates to the data points during data processing and mapping.

3.2.8 EM31 Survey

3.2.8.1 The EM31 was assembled and adjusted according to the instrument operation manual including zeroing the apparent conductivity and in-phase responses. The adjustments were made at a location free of cultural interference.

3.2.8.2 The instrument operator collected EM31 data along the survey with the antenna boom parallel to the direction of travel. The antennas were oriented to provide vertical dipole data. Both apparent conductivity and in-phase response data were collected simultaneously. Data were collected at a rate of one sample per second while walking along lines spaced 5 feet apart.

3.2.8.3 While surveying, fiducial markers were inserted by the operator into the data at 50-foot intervals across the grid using the data logger. These markers served to provide location references that were used during data processing and mapping.

3.2.8.4 The EM31 was used only at Site 15 where a large dump site was suspected.

3.2.9 G-858 Downloading and Processing

3.2.9.1 Data collected with the G-858 was processed after downloading. The processing primarily involved ensuring that survey lines were correctly recorded with respect to their survey direction, distance, and grid coordinates. Data were downloaded from the G-858 data logger into a computer using the Geometrics® Magmap2000 software. The data was then backed up and edited as needed. The markers in the data were used to adjust the spacing of points to compensate for variations in the walking speed of the operator and topography.

3.2.9.2 Data files from the G-858 surveys were exported from Magmap2000 into Geosoft Oasis Montaj® and graphical representations were created showing results of the

surveys. Color graphical representations were produced to display the results from the surveys.

3.2.10 EM61 Downloading and Processing

3.2.10.1 Survey data files were downloaded from the EM61 data logger into a computer using the Geonics DAT61 software (version 1.70). The data for each survey were then backed up and preprocessed by adjusting start, end and fiducial marker points entered by the geophysical operator during the survey. This process adjusted the positions of data points to compensate for variations in the operator's walking pace.

3.2.10.2 The DAT61 files were exported into ASCII-format (XYZ) files. Oasis Montaj was used to process and prepare color maps showing the EM61 data. Anomalies representing the suspected buried items were selected from the maps by using the software.

3.2.11 EM31 Downloading and Processing

3.2.11.1 Survey data files were downloaded from the EM31 data logger into a computer using the Geonics® DAT31 software (version 1.34). The data for each survey were then backed up and preprocessed by adjusting start, end and fiducial marker points entered by the geophysical operator during the survey. This process adjusted the positions of data points to compensate for variations in the operator's walking pace.

3.2.11.2 The DAT31 files were exported into ASCII-format (XYZ) files. Oasis Montaj was used to process and prepare color maps showing the EM31 data. Anomalies representing the suspected buried items were selected from the maps by using the software.

3.2.12 Quality Control

3.2.12.1 As part of the field procedure, several measures were taken to monitor the quality of the data collected by the various instruments. The instruments were used by operators familiar with the response of the instruments in various conditions. The quality control (QC) data collected indicated that the geophysical instruments were consistent and repeatable within expectations.

3.2.12.2 Geophysical data collected in the field were reviewed at several stages. The first quality check was during data collection. The field crews checked the data logger to monitor instrument response and to ensure that data were being collected. They also examined the data during data logger "dumps" when the information was downloaded to the hard drive of a field computer. Another quality check occurred when the data were preprocessed and formatted for use. Cultural features, geological features and other relevant information were noted on the field data forms. Another quality check was performed when the data were loaded into the mapping system.

3.2.12.3 Each day before beginning work with any of the geophysical instruments, an instrument drift check was performed on each piece of equipment. The instrument was first turned on and allowed to warm up for approximately five minutes. It was then

placed in a single location and allowed to collect data for approximately five minutes. The data were then reviewed by the project geophysicist for problems with the drift of instrument response. No problems were detected.

3.2.12.4 Two repeat lines of data were also collected at the end of each grid or block of grids surveyed. These data were used to evaluate any instrument drift that may have occurred over the course of the survey, to assess data repeatability and to verify positioning accuracy. The repeat data showed that the instruments were functioning normally.

3.2.12.5 Baseline QC was performed by visiting a 150 ft transect (line 25 E) at the prove-out grid with each instrument system used at former Camp Sibert. Each instrument was operated along the QC transect six times in the following manner:

1. Normal pace from 0 to 150 ft, no QC item on transect.
2. Normal pace from 150 to 0 ft, no QC item on transect.
3. Normal pace from 0 to 150 ft, QC item (i.e. steel bar) on transect.
4. Normal pace from 150 to 0 ft, QC item on transect.
5. Fast pace from 0 to 150 ft, QC item on transect.
6. Slow pace from 150 to 0 ft, QC item on transect.

The baseline QC check was performed weekly using each EM61 and G-858 instrument. The QC test item was a thin steel bar placed horizontally (east-west) on the transect. The QC transects showed that the instruments were operating normally. For the EM61 towed array system, the response was checked using a standard item (trailer hitch ball) and the positional accuracy was checked using a long steel bar. These procedures are described in the Geophysical Work Plan.

3.2.12.6 QC of the GPS systems was accomplished by verifying readings at survey monuments of known coordinates. A permanent survey monument located a short distance from the prove-out grid was used for this purpose, as well as other monuments and known points scattered around former Camp Sibert.

3.2.13 Anomaly Identification

3.2.13.1 Once the geophysical data were formatted and processed, the Project Geophysicist or his designate selected anomalies from the data based on the site history, observations from site visits, observations made during data acquisition, and project objectives. Parsons presented the selected anomalies to the USAESCH lead geophysicist for concurrence and approval. The anomaly locations are indicated in the accompanying figures in this report. The EM61 instrument response in millivolts (mV) is indicated by a color level plot in the legend where higher values (at the upper end of the legend color bar) represent the presence of metal and low values (near 0 mV on the color bar) indicate readings near background.

3.2.14 Anomaly Reacquisition

The anomalies selected for investigation were uniquely numbered and entered onto Anomaly Dig Sheets for intrusive investigation. Anomaly locations were reacquired based on the coordinates, as well as by confirming the position of the anomalies using the EM61. During re-acquisition, the audio output and digital readout of the EM61 were used to detect anomalies.

3.3 AIR MONITORING

3.3.1 During the investigation activities at the former Camp Sibert, a variety of air monitoring was conducted at each investigation area to:

- Determine the airborne concentrations of contaminants to which personnel working on the site would be exposed without personal protective equipment (PPE) or other control measures, and to evaluate the adequacy of PPE or other control measures used by site workers;
- Determine the airborne concentration of contaminants being released from on-going site activities and evaluate the need for additional engineering controls during intrusive trenching or excavation; and
- Determine the airborne contaminant concentrations at the site perimeter during intrusive activities and to evaluate, document and control potential public exposures.

3.3.2 An overview of the air monitoring activities conducted during the investigation is presented below. A detailed description of the air monitoring conducted during the investigation is presented in the Site Safety Submission (Parsons, 2001).

3.3.1 Photoionization Detector

A photoionization detector (PID) was used to monitor total organic contaminants present in the air during intrusive operations. PID readings were used to determine the level of respiratory protection required for personnel working in the exclusion zone (EZ). PID monitoring was performed in the general area of the excavation within the EZ.

3.3.2 Aerosol Monitoring

An MIE Mini-Aerosol Monitor was used to measure the concentration of airborne particulate matter generated during heavy equipment trenching activities. The concentration of particulate matter was used to determine the need for implementing dust suppression controls.

3.3.3 Carbon Monoxide (CO) Monitoring

All intrusive operations at Site 15 were conducted inside of an enclosed structure in order to protect nearby traffic from a potential chemical agent release. Since a backhoe

was used in the enclosed structure during excavations, a CO monitor was required to protect the downrange team from elevated concentrations of CO.

3.3.4 Colorimetric Tubes

Colorimetric tubes were used to monitor the concentration of benzene when the total concentration of vapors in the breathing zone, as measured with the PID, exceeded 1 ppm. The concentration of benzene was monitored to determine the proper level of PPE for site workers. Colorimetric tubes were also available for chlorine, trichloroethylene, chloroform, and phosgene.

3.3.5 Miniature Chemical Agent Monitoring System (MINICAMS)

MINICAMS is an air monitoring system that collects compounds on a solid sorbent trap, thermally desorbs them into a capillary gas chromatography column for separation, and detects the compounds with a Halogen Specific Detector (XSD). Near-real-time air monitoring was conducted using MINICAMS set to alarm at 0.7 times the time weighted average (TWA) hazard level for HD. MINICAMS sample lines were positioned at each investigation site during intrusive activities. The sample ports were placed as close as possible to the excavation site without jeopardizing the analytical instrumentation. The MINICAMS operators were instructed to notify downrange teams if chemical warfare agents were detected.

3.3.6 Depot Area Air Monitoring System (DAAMS)

DAAMS is a portable air-sampling unit, designed to draw a controlled volume of air through a glass tube filled with a collection material. As the air is passed through the solid sorbent tube, agent is collected on a sorbent bed. After sampling with a predetermined flow rate for the predetermined period of time, the tube is removed from the vacuum line and transferred to the mobile on-site laboratory for analysis for the presence, type, and quantity of agent in the sampling tubes. Five DAAMS monitoring stations were established during the intrusive operations of the Phase II CWM EE/CA: four points around the excavation (approximate compass points) and one in close proximity to the intrusive activities. The purpose of these sample locations was to provide confirmation of MINICAMS detections or determine if any releases reached the perimeter of the site.

3.4 INTRUSIVE EXCAVATION INTO SUSPECT CWM AREAS

3.4.1 Intrusive sampling, including hand-tool excavation, backhoe trenching, and soil borings were conducted to evaluate the potential presence of CWM and/or buried MEC. Locations for hand-tool excavation and trenching were based on results of the geophysical surveys. Intrusive operations were conducted by Parsons and USA Environmental personnel using a backhoe, skid steer loader, and/or hand tools. PID, aerosol, and colorimetric tube monitoring was conducted by the downrange personnel. ECBC personnel performed continuous monitoring of down-range air quality for agents during excavation activities using the MINICAMS and DAAMS tubes.

3.4.2 The intent of the intrusive excavation was to assess the individual anomaly or characterize the contents of a trench or pit. For individual anomalies, once an item was encountered and removed, the bottom of the excavation was swept with a magnetometer to evaluate if the anomaly had been cleared by removing the item. If the magnetometer still indicated a subsurface anomaly, the excavation was continued. All non-CWM/MEC scrap was returned to the excavation.

3.4.3 Subsurface soil samples collected from the excavations for laboratory analysis were selected from beneath and/or within suspect areas based on appearance (e.g. discoloration or texture contrast differentiating them from surrounding soil). Excavation activities were documented in the downrange logbook.

3.4.4 Soil borings were performed at Site 2A, Site 3, Site 4, and Site 16 to evaluate the potential presence of chemical agent and ABPs. The soil borings from Site 2A were collected during the Phase I CWM EE/CA investigation and were also analyzed for chloride. Along with analysis for chemical agent and associated ABPs, the soil borings collected at Site 3 were analyzed for arsenic and chloride. Each soil boring sample was collected from depth ranges of 0 to 2 feet and 2 to 4 feet.

3.5 SOIL SAMPLING AND ANALYSIS

3.5.1 All sampling equipment was decontaminated prior to each use. If not used immediately, decontaminated sampling equipment was wrapped in aluminum foil after drying. Each soil sample was collected using either an auger bucket or a stainless steel spoon. The spoon would be used by removing the soil directly from a backhoe bucket or by scooping the soil from the ground. The soil samples were placed in a stainless steel bowl and homogenized. After homogenization, the soil sample was transferred immediately into a glass sample jar with Teflon-sealed screw caps, leaving approximately one inch of headspace above the soil. The containers were labeled and placed inside a zip-lock bag at the sample location. The outside of the zip-lock bag containing the sample bottle was decontaminated and then placed inside a second zip-lock bag prior to moving it to the support zone. The samples were then relinquished under chain-of-custody procedures to ECBC for headspace screening.

3.5.2 Headspace screening on the double zip-lock bag sample for site-specific chemical agents was conducted on-site using a MINICAMS unit. The jar of soil sample was heated to a minimum temperature of 70° F. The evolved vapors were collected through Teflon tubing attached to the hot box and introduced directly into the MINICAMS unit. The results of the analysis were logged by ECBC personnel and provided to Parsons.

3.5.3 Samples cleared by ECBC were relinquished back by chain-of-custody to Parsons. The sample jars were placed into a cooler filled with bagged ice to keep the temperature of the samples at or below 4 degrees Celsius. The samples were then shipped to the ECBC laboratory in Aberdeen, Maryland for analysis for chemical agents of concern and breakdown products. Specific agents and breakdown products analyzed were selected based on past site activities. Daily Situation and Clearance Reports and soil

analytical reports from ECBC are included in Appendix C. A summary of samples collected for analytical testing is contained in Table 3.1.

3.5.4 Parsons conducted a quality control data evaluation of all soil analytical test results. The quality control data evaluation summary report is contained in Appendix C.

3.6 INVESTIGATIVE-DERIVED WASTE (IDW) DISPOSAL

IDW included materials and items generated during the Phase II CWM EE/CA intrusive investigation. The types of materials that were disposed of are listed below:

- Personal protective equipment (PPE) that was generated during the intrusive investigation was cleared and documented as non-detect by ECBC. All PPE material was placed in an onsite dumpster and disposed of by a local sanitary refuse company.
- IDW generated at the personnel decontamination station (PDS) constituted a small amount of drummed waste during the course of the investigation. IDW was sampled for HD, HN-1, HN-3, L, and ABPs on June 27, 2005. Results of the analysis show that the IDW was negative for chemical agents and ABPs. The drummed IDW was diluted and disposed of on the ground surface in accordance with the approved Work Plan.
- Laboratory waste generated by the air monitoring team was packed and locked in the flammable locker. The waste was subsequently over packed and sealed in a five gallon and is waiting removal by Onyx Environmental for disposal.
- Since air monitoring at Site 15 did not detect chemical agent, filters used in the chemical agent filtration system (CAFS) were discarded by a local sanitary refuse company.
- One piece of practice ordnance and two flamethrower igniters were recovered during the investigation of Site 15. The items are currently secured in a scrap drum inside the drum staging area at the main compound of the former Camp Sibert.

No CWM or 3X scrap was encountered during the Phase II CWM EE/CA investigation.

3.7 SOURCE, NATURE, AND EXTENT OF CWM

Former Camp Sibert was used for training in aspects of both basic military training and in the use of chemical weapons, decontamination procedures, and smoke operations in the 1940s. Chemical training involved the use of HD and other agents. The results from this Phase II CWM EE/CA confirmed that the probability of any CWM in the environment at four of the eight sites investigated is remote. Based on historical documentation, Site 2A contains disposal pits for CWM. The investigations of Site 3, Site 4, and Site 12 remain incomplete at this time. Specific findings of the investigation are described in the following sections.

3.8 UPDATE OF ARCHIVES SEARCH REPORT

No update of the ASR is recommended.

Table 3.1
Summary of Samples Collected and Analytical Testing Performed

Location	Sample Type ¹	Analytes							Comments
		HD	HN-1	HN-3	Lewisite	ABPs ²	Arsenic	Chloride	
Site 2A	SB/SS	X			X	X	X ³	X	
Site 3	SB	X			X	X	X	X	
Site 4	SB	X	X	X	X	X			
Site 6	N/A								No Samples Collected
Site 11/11A	SS	X				X			
Site 12	N/A								No Samples Collected
Site 15	SS	X				X			
Site 16	SB/SS	X				X			

Note: Soil boring samples at Site 2A were collected in 2001 during Phase I CWM EE/CA investigation

¹ SB = Soil Boring, SS = Soil Sample, N/A = Not Applicable

² ABPs - Agent Breakdown Products including 1,4-Dithiane, 1,4-Thioxane, Thiodiglycol, 2-Chlorovinyl Arsenous Acid, and 2-Chlorovinyl Arsenous Oxide - if applicable

³ Soil borings collected during the Phase I CWM EE/CA investigation were not analyzed for arsenic concentrations

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FINAL

1.4.1 Location. Camp Sibert, Alabama consists of 37,034.99 acres in the Etowah and St. Clair counties. The property ran from northeast to southwest just southeast of Gadsden and Attalla, Alabama. Camp Sibert lies in a valley between Texas Ridge on the northwest, and the Dunaway Mountains on the southeast. A section of the Coosa River and Neely Henry Lakes are immediately southeast of the mountains. The City of Gadsden is encroaching on the property from the northeast but much of it is still rural area. Some of the property is under cultivation, while other areas are in pasture and woodlands.

1.4.2 Past uses of the site. Camp Sibert was acquired in July 1942 by the U.S. Army as a replacement training center for the Chemical Warfare Service (CWS) and a Chemical Warfare School was established during WWII. At Camp Sibert the CWS conducted various training exercises such as smoke screen defense, chemical decontamination, chemical depot maintenance, and chemical impregnation of clothing. Chemical troops equipped the camp with chemical filling stations, a toxic gas yard, and decontamination areas. The Army also constructed an airfield for the simulation of chemical air attacks against troops. The camp was closed at the end of the war in 1945, and the chemical school was transferred to Ft. McClellan, Alabama. The Army declared the property excess and transferred it to the War Assets Administration in November 1946, and then to the Farm Mortgage Corporation. The Government terminated the leases on the area in December 1946. After decontamination of various ranges and toxic areas in 1948, the land was transferred back to private ownership. The airfield, however, was transferred to the City of Gadsden.

1.4.2.1 The following areas of Camp Sibert were identified as suspect OE/CWM sites:

- Site #1 - Decontamination Operations (Practice) Training Area
- Site #2 - Live Mustard Training Area (Tract C230)
- Site #2a - Chemical Munitions Burial Site
- Site #2b - Chemical Land Mine Training Area
- Site #3 - Former Toxic Gas Yard and Burial Site (Tract D340)
- Site #4 - Toxic Gas Yard
- Site #5 - Chemical Processing Plant
- Site #6 - Chemical Filling Area, DA-5
- Site #7 - Chemical Processing Plant #1, 1P-1
- Site #8 - Toxic Munitions Impact Area
- Site #9 - 4.2" Mortar Range and Toxic Gas Yard
- Site #10 - Igloo/Magazine Area
- Site #11 - Possible Munitions Burial Site
- Site #12 - Smoke Generator and Possible Munitions Burial Area
- Site #13 - Possible Contaminated Equipment Burial Area
- Site #14 - Possible Munitions Burial Site
- Site #15 - Possible Munitions Burial Site
- Site #16 - Air Operations Filling Area
- Site #17 - Japanese Pillbox Area No. 1

FINAL

Site #18 – Japanese Pillbox Area No. 2

Site #19 – Conventional Mortar Impact Areas

Site # 20 – Range 16 (Rocket (AT), and Grenades (Hand and Rifle))

1.4.2.2 The following sites have not been previously investigated but have been identified as training installations and may warrant investigation as potential conventional OE sites:

- 1. Mine Field Training*
- 2. Demolition Area (DA-7)*
- 3. Infiltration Area – Range 5*
- 4. Practice Hand Grenade Court (HG-1)*
- 5. German Village – Range 22*
- 6. Range 24*

1.4.2.3 The following sites have not been previously investigated but have been identified as features of interest by the U.S. Army Research and Development Center Topographic Engineering Center (TEC) and may warrant investigation as potential conventional OE sites:

- 1. F19 – Mound*
- 2. F20 (A, B, & C) Ground scars off a trail*
- 3. F28 – Disturbed ground, linear features, and a depression*
- 4. F29 – Ground scar*
- 5. F30 – Ground scar*
- 6. F33 – Ground scar*
- 7. F24 – Mound*
- 8. F25 – Disturbed ground, ground scars and possible trenches*
- 9. F26 – Disturbed ground*
- 10. F34 – Ground scar*
- 11. F35 – Ground scar*
- 12. F36 – Disturbed ground, ground scars*
- 13. F37 – Linear features or rows*
- 14. F38 – Ground scar*
- 15. F39 – “Booby Trap” house location*
- 16. F40 – Cleared area*
- 17. F41 – Mound*
- 18. F42 – Ground scar*
- 19. F43 – Disturbed ground*
- 20. F44 – Ground scar*
- 21. F45 – Ground scar*
- 22. F46 – Ground scar*
- 23. F47 – Ground scar*

FINAL

- 24. F48 – Mound
- 25. F49 – Possible dump
- 26. F50 – Mound
- 27. F52 – Ground scar
- 28. F53 – Possible dump
- 29. F56 – Ground scar
- 30. F57 – Ground scar
- 31. F58 – Ground scar
- 32. F59 – Ground scar

1.4.2.4 Other sites within former Camp Sibert not specifically addressed above, may subsequently be identified as suspect OE/CWM sites, or otherwise as sites of interest, during the normal course of review of available historical information, personnel interview, etc. It is the intent of this SOW to be able to individually assess the need to investigate such sites, and incorporate such investigations into the current work effort as determined necessary and appropriate by the Government.

1.4.2.5 Some sites have been removed from further suspect CWM investigation due to further historical document finds that described their use in more detail. These sites are:

- Site #1 - Decontamination Operations (Practice) Training Area
- Site #5 - Chemical Processing Plant
- Site #7 - Chemical Processing Plant #1, 1P-1
- Site #10 - Igloo/Magazine Area

1.4.3 Current uses of the site. Since 1949 most of the property has been privately owned and either farmed or left as woodlands. The airfield has been improved, and is now the Gadsden Municipal Airport. The cantonment area has been developed into a single family housing area. The City of Gadsden has expanded into the area of the airport.

2.0 OBJECTIVES

2.1 One objective of this task order is for the Contractor to prepare an Engineering Evaluation/Cost Analysis (EE/CA) that evaluates a wide range of strategies of risk abatement and recommends the preferred alternative(s) for the CWM sites at the former Camp Sibert, Gadsden, Alabama. The work is to be performed in a manner consistent with the response program identified in the National Contingency Plan (NCP), 40 CFR 300, and particularly parts .400 through .415 and .800 through .825 and the guidance contained in "Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA". All activities involving work in areas potentially contaminated with unexploded ordnance shall be conducted in a manner consistent with US Army Engineering and Support Center (CEHNC), Headquarters, US Army Corps of Engineers (USACE), Department of the Army (DA) and Department of Defense (DoD) requirements regarding personnel, equipment and procedures.

2.2 Since numerous kinds of weapons, munitions and related materials have been handled at the former Camp Sibert in many different areas, unexploded ordnance (UXO) may be buried at the sites and/or be on the ground surface. The UXO is still capable of functioning and should the public encounter these items there is a significant possibility

Government approved methods for chemical warfare material analysis, and the number of analyses to be performed. In the absence of analytical methods for chemical agent degradation products, the A-E shall identify and recommend analytical methods utilized in the commercial chemical surety laboratories and shall include the associated detection limits of the matrix. A complete copy of the chemical agent and chemical agent degradation products shall be included in the work plan with the associated detection limits. The A-E's laboratory must be validated or participate in a laboratory program by the Edgewood Chemical Biological Center (ECBC) for the performance of analysis under this task order. The U.S. Army Soldier, Biological Defense Command (SBDCOM) will provide on-site screening of samples prior to shipment of the samples from the site.

3.2.16 Geophysical Investigations Plan. Geophysical Investigations will be a major part of the Site Characterization for this project. The geophysical investigations shall be managed by a qualified geophysicist (i.e., an individual with a degree in geophysics, geology, geological engineering, or closely related field, and who has a minimum of five years of directly related geophysical experience).

3.2.16.1 It is the responsibility of the A-E to select and justify appropriate geophysical methods, equipment and personnel for use at the site. This shall be presented in the Work Plan and approved by the Contracting Officer prior to any fieldwork.

3.2.16.2 As part of the work plan the A-E shall prepare a site-specific Geophysical Investigation Plan that describes and justifies proposed equipment, methods, personnel and procedures for accomplishing geophysical investigations at the site. The geophysical instrumentation shall be capable of detection in accordance with the following performance goals:

PERFORMANCE GOALS OF GEOPHYSICAL INVESTIGATIONS

Ferrous Mass	Required Min. Detection Depth
0.2 lb	- .25 foot
1 lb	- 2 foot
10 lb	- 4 feet
40 lb	- 6 feet
100 lb	- 8 feet
1000 lb	- 10 feet

Field instrumentation shall be field tested daily to ensure that they are operating properly. The A-E shall identify in the work plan, for Government

Health Consultation

PETITION SITE

FORMER CAMP SIBERT

ETOWAH and ST. CLAIR COUNTIES, ALABAMA

OCTOBER 31, 2007

**U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Agency for Toxic Substances and Disease Registry
Division of Health Assessment and Consultation
Atlanta, Georgia 30333**

Health Consultation: A Note of Explanation

An ATSDR health consultation is a verbal or written response from ATSDR to a specific request for information about health risks related to a specific site, a chemical release, or the presence of hazardous material. In order to prevent or mitigate exposures, a consultation may lead to specific actions, such as restricting use of or replacing water supplies; intensifying environmental sampling; restricting site access; or removing the contaminated material.

In addition, consultations may recommend additional public health actions, such as conducting health surveillance activities to evaluate exposure or trends in adverse health outcomes; conducting biological indicators of exposure studies to assess exposure; and providing health education for health care providers and community members. This concludes the health consultation process for this site, unless additional information is obtained by ATSDR which, in the Agency's opinion, indicates a need to revise or append the conclusions previously issued.

You May Contact ATSDR TOLL FREE at
1-800-CDC-INFO

or

Visit our Home Page at: <http://www.atsdr.cdc.gov>

HEALTH CONSULTATION

PETITION SITE

FORMER CAMP SIBERT

ETOWAH and ST. CLAIR COUNTIES, ALABAMA

Prepared By:

Site and Radiological Assessment Branch
Division of Health Assessment and Consultation
Agency for Toxic Substances and Disease Registry



Table of Contents

Statement of Issues1
Summary of Findings.....1
Background.....2
 Site Description and History.....2
 Demographics3
Investigations3
 Findings from EE/CA Investigations.....4
Discussion.....11
 Conventional Explosives and CWM Hazards11
 Residual CWM or Hazardous Chemicals in Private Drinking Water Wells12
 Direct Contact with Residual CWM or Hazardous Chemicals in Soil12
 Mustard Agents.....12
 Lewisite.....13
 Phosgene15
 Managing Future Hazards.....17
Community Health Concerns.....18
Conclusions and Recommendations20
Author22
References.....23



Statement of Issues

The Agency for Toxic Substances and Disease Registry (ATSDR) prepared this health consultation in response to a request by local citizens, to evaluate potential community exposures to contaminants that may have been released from the former Department of Defense facility, Camp Sibert in Etowah and St. Clair Counties, Alabama. Local citizens are concerned that chemical warfare materiel (CWM), conventional ordnance, or chemical contamination residues may be currently affecting their health.

Camp Sibert is a former Army base used from 1942 to 1945 for training in the use of CWM and conventional weapons. In 1948, the land was turned over to the local government. The property today is comprised of private and local government-owned land used for farming, grazing land, residential, commercial, and light industrial purposes.

Past operations at Camp Sibert include the use of CWM, conventional explosive munitions, and hazardous chemicals that may have been buried or left in place. Some decontamination efforts were conducted prior to property transfer in 1948. The U.S. Army Corps of Engineers (USACE) is currently performing environmental investigations to characterize use and disposal areas and evaluated potentially contaminated areas.

Summary of Findings

ATSDR identified potential exposure situations most likely to occur from materiel associated with the former Camp Sibert.

Adults and children could come in contact with conventional explosives or CWM hazards encountered during ground-disturbing activities.

ATSDR categorizes the former Camp Sibert as a current and future public health hazard because conventional munitions, explosives, or CWM hazards are likely present on privately owned residential and commercial properties close to the ground surface where ground disturbance could cause detonation resulting in significant harm.

Adults and children could come in contact with residual CWM or hazardous chemicals by drinking potentially contaminated water from their private drinking water wells.

Past investigations detected trichloroethylene (TCE) in samples from a private well, groundwater, and soil located near Site 2A. Although the details of earlier private well sampling is not available, it is possible that the residents could be drinking contaminated water. USACE is currently investigating private well contamination.

Adults and children could come in contact with residual CWM or hazardous chemicals by direct contact with contaminated soil.

Residual explosive compounds, VOCs, inorganic compounds, and chlorine used during decontamination may be detectable in soil. Contaminants in soil occur in concentrated areas and are not widespread. Although environmental investigations continue, soil contaminant levels detected to date do not appear to be high enough to cause harmful health effects in people who might directly contact residual contaminants in soil.

Background

Site Description and History

Camp Sibert occupied approximately 37,035 acres in Etowah and St. Clair Counties in the Canoe Creek Valley of northeastern Alabama. The former Camp Sibert lies in a tract of land approximately 14 miles long by 5.5 miles wide, between Chandler Mountain and Red Mountain to the northwest, and Canoe Creek, Hopewell Mountain, and Dunaway Mountain to the southeast. Interstate 59 (I-59) runs through the former Camp Sibert, and U.S. Highway 411 (US411) parallels the former camp to the southeast. Neighboring cities include Gadsden to the northeast, Attalla to the north, Rainbow City to the east, and Steele to the west. Presently, the site is mostly rural comprised of forests and open pastures.

In 1942, Camp Sibert began operating as the Replacement Training Center (RTC) for the Army Chemical Warfare Service. The RTC moved from Edgewood, Maryland to Camp Sibert in the summer. In the fall of 1942, the Unit Training Center (UTC) was added as a second command. Camp Sibert was operational from 1942 through 1945.

Groups of soldiers received basic military training and specialized training in the use of chemical weapons, including the use of live mustard, Lewisite, phosgene, and other chemical agents, decontamination procedures, and smoke operations. This facility provided the opportunity for live agent, large scale training that was previously unavailable (Parsons 2005).

Basic military training at firing ranges included use of conventional weapons of various types including the use of grenade launchers (M1), portable flame throwers, Thompson sub-machine guns (.45 caliber), carbines (.30 caliber), pistols (.45 caliber), fragmentation and white phosphorous grenades, Browning automatic rifles, 4.2 inch white phosphorous mortars, 4.2 inch high explosive mortar rounds, machine gun, both rifle and hand grenade, artillery, bazookas, and anti-aircraft weapons.

After World War II ended, several cleanup operations were conducted by the Army including decontamination of various chemical and artillery ranges. However, little historical documentation has been found that details the decontamination efforts (Parsons 2005).

In 1948, the land was declared excess and transferred back to local government ownership. Since 1949, most of the property has been privately owned and either farmed or left as woodlands. The former post airfield is now the Northeast Alabama Regional Airport and the city of Gadsden has



expanded into the local area of the airport. The barracks area was developed into single-family housing and several industrial facilities are in operation in the former Camp Sibert industrial area. The former maneuver and training areas, which comprise the majority of the land area, are now used for residences, grazing, forestry, and agriculture.

Demographics

The majority of the former Camp Sibert is undeveloped and sparsely populated. Although the number of residents living in the area is low, additional residential, commercial, and industrial development in the near future is anticipated. In developed areas, the predominant land use is agricultural. The major agricultural activities include cattle grazing. A large portion of the site is forested; however, there are no known forestry operations.

The former Camp Sibert occupied land in Etowah and St. Clair Counties in northeastern Alabama. Etowah County comprises 535 square miles and in 2003 had a population of 103,119. Gadsden, with a population of 38,978, is the largest city within Etowah County (Gadsden IDA 2002). Approximately 83% of residents in Etowah County are Caucasian (US Census Bureau 2002). The median age of residents is 39 years of age.

St. Clair County encompasses 634 square miles with a population of 66,402. Approximately 90% of residents in St. Clair County are Caucasian (US Census Bureau 2002). St. Clair County became the sixth fastest growing county in Alabama during 1990 and 2000 having approximately 30% growth. The median age of residents is 37 years of age.

Investigations

The former Camp Sibert is considered to be a formerly used defense site and is currently under environmental investigation by the USACE. Archival searches, interviews with former Camp Sibert personnel or those stationed at Camp Sibert, and historical aerial photographic reviews have been conducted. In 1993, the USACE began conducting archive searches. In 1995, Phase I and II Site Characterizations began, which included only geophysical surveys, no intrusive (below ground surface) or environmental sampling was done. In 1997, additional archive searches and reviews were conducted by the USACE. In 2000, as part of the CWM Engineering Evaluation and Cost Analysis (EE/CA) investigation, the USACE conducted geophysical surveys, trench and pit excavations, air monitoring, soil sampling and analysis, and excavation of irregularities suggesting metal items, referred to as "anomalies". The Final Phase I CWM EE/CA was released in June 2005. Final Phase II CWM EE/CA was released in May 2006. USACE continues to investigate the former Camp Sibert.



Based on previous site studies, archive searches, and interviews, a total of thirteen locations (sites) within the former Camp property are suspect for the disposal of chemical warfare materiel. Current investigations include the thirteen suspected CWM sites, conventional sites or ranges, and conventional training areas. In addition, several areas have been selected for further investigation because of ground scars or ground disturbances seen by aerial photography as potentially of interest. Listed below are the 13 suspected CWM sites and the CWM EE/CA reports that detail the investigations.

- Site 2A (Chemical Munitions Burial Site - Tract C230) - Phase I, II CWM EE/CA
- Site 2B & Alternate 2B (Chemical Land Mine Training Area - Tract C230) - Phase I CWM EE/CA
- Site 3 (Former Toxic Gas Yard and Burial Site -Tract D340) Access Denied by Owner
- Site 4 (Toxic Gas Yard) Access Denied by Owner
- Site 6 (Chemical Filling Area, DA-5) - Phase II CWM EE/CA
- Site 8 (Toxic Munitions Impact Area) - Phase I CWM EE/CA
- Site 9 (4.2" Mortar Range) - Phase I CWM EE/CA
- Site 11 & 11A (Possible Munitions Burial Area) - Phase II CWM EE/CA
- Site 12 (Smoke Generator and Possible Munitions Burial Area) Access Denied by Owner
- Site 13 (Possible Contaminated Equipment Burial Site) - Phase I CWM EE/CA
- Site 14 (Possible Munitions Burial Area) - Phase I CWM EE/CA
- Site 15 (Possible Munitions Burial Area) - Phase II CWM EE/CA
- Site 16 (Air Operations Filling Area) - Phase II CWM EE/CA

Findings from EE/CA Investigations

Five sites (Sites 2B/Alt 2B, 8, 9, 13, and 14) investigated as part of the Phase I CWM EE/CA were initially thought by USACE to present low likelihood for CWM. Sites that potentially had a greater hazard were investigated as part of the Phase II CWM EE/CA. Phase II sites included Sites 2A, 6, 11/11A, 15, and 16. Sites 3, 4, and 12 could not be investigated because the USACE was not granted access by land owners.

The USACE conducted geophysical surveys, single anomaly excavations, trench and pit excavations, air monitoring, and soil sampling and analysis at the sites beginning in 2000 (Table 2). Sites 2A, 2B, and 8 are discussed below in greater detail because of the potential hazards identified during the EE/CA investigations. No evidence of CWM was encountered and no residual chemical warfare agent was detected at Sites 6, 11/11A, 13, 14, 15, and 16.

Site 2A

Site 2A, Chemical Munitions Burial Site, Tract C230 was used for chemical agent decontamination training and is known to contain buried training materials in three separate pits. Contents of the pits were excavated during a 1948 decontamination effort by the Army and were treated by burning, hydrolysis in water, decontaminated with chloride of lime, or a combination of these. The pits were reported to contain debris as well as intact or partially intact drums, mortar rounds, and portable containers containing mustard, Lewisite, and tear gas. Contents included drums of partly decomposed mustard, drums containing Lewisite, and twenty-six 4.2-



inch mortar rounds containing tear gas. The Army recommended this area be restricted to grazing only, but when the property was transferred to private ownership, this restriction was not conveyed. The 1993 Archives Search Report conducted by the Army concluded that the possibility of other burial sites could exist within Site 2A. The Phase II EE/CA states that future development within the Site 2A property will increase the likelihood for human exposure to chemical agent contaminated media.

In the 1990 initial assessment, trichloroethylene (TCE) was detected in a private well located approximately 600 feet from the burial pits near Site 2A. TCE concentrations exceeded the State of Alabama groundwater standards at the time. Drinking water standards were not yet in place. The groundwater samples did not detect organosulfur compounds or thiodiglycol (mustard breakdown products). Soil samples near the same area contained arsenic, chromium, lead, and chlorinated solvents (Parsons 2005). It is not clear if this well was used as a primary drinking water source or if any additional action was taken regarding this well.

Further investigation of Site 2A in 1996 also identified TCE and various metals in soil and in groundwater samples above EPA's maximum contaminant level for drinking water.

Site 2B & Alternate 2B

Site 2B, Chemical Land Mine Training Area, was formerly used as the chemical land mine training area where chemical land mines were filled and detonated. The Army's investigations focused on those areas most likely used for mustard-filled land mine training and included geophysical surveys, air monitoring, and soil sampling. Site 2B/Alt 2B investigations found barbed wire, nails, horseshoes, and rusted metal slag from expended incendiary grenades. Additionally, metal rings consistent with 20-gallon drums that contained the chemical warfare decontaminant Super Topical Bleach (STB) was also found. In the soil, chlorine at levels 10 times greater than background was detected indicating decontamination efforts. The chemical agent and agent breakdown products sampling results did not detect the presence of residual chemical agents or associated chemical agent breakdown products. There are residents currently living within the boundary of Site 2B/Alt 2B. Additionally, the area is used as open pasture and is partially wooded. Based on the results of the investigations and current and near future use, human exposure to chemical agents is possible.

Site 8

At Site 8, Toxic Munitions Impact Area, an initial geophysical mapping survey was conducted on approximately 5.6 acres. To date, approximately 8,500 anomalies have been investigated, and approximately 20,000 pounds of mortar scrap and 18 intact, liquid-filled 4.2-inch mortars some containing the choking agent phosgene have been discovered. These mortars have been packaged and are stored in an interim holding facility pending final assessment and disposition.

Finding of the first liquid filled 4.2 inch mortar led to a temporary suspension of the intrusive activities. The mortar round was destroyed onsite using the Explosive Destruction System, which contains and filters all material. All residual material was drummed and transported offsite for thermal treatment as required by Army regulations. A removal action has been underway at Site 8 since April of 2006.



Since 1946, primary land use in Site 8 has been undeveloped woodland. In 1996-1997, approximately 140 acres in the central part of the site were clear-cut and converted to pasture land for cattle grazing. Site 8 also contains two residences, a barn, and some miscellaneous outbuildings. According to the USACE Phase II Report, the likelihood for human exposure to CWM at Site 8 is considered to be moderate because of the limited number of inhabitants and current passive land use activities. However, the potential for near-future development to the north by the Town of Steele and to the south will increase the likelihood for human exposure to CWM.

Other Sites

No evidence of CWM was encountered or residual chemical warfare agent was detected at Sites 6, 11/11A, 13, 14, 15, and 16. Three sites have not been fully investigated. Site 3, (Former Toxic Gas Yard and Burial Site - Tract D340) was not completely investigated because right of entry documentation was denied by one of the property owners. Site 4, Toxic Gas Yard was partially investigated because the right of entry was retracted during the intrusive investigation. Site 12, Smoke Generator and Possible Munitions Burial Area, was not investigated because right of entry was denied for the entire site.



Table 1 – Suspected Chemical Warfare Materiel Sites Investigated during EE/CA Phase I and II.

Sibert Site Designation Name and Location	Potential Chemicals	Current Use and People Potentially Impacted	Hazard Potential	ATSDR Recommendation
Site 2A (Chemical Munitions Burial Site - Tract C230) used for chemical agent decontamination training and burial site for training material and equipment. It contained a mustard agent soak pit, agent storage, and supply building. Located west of Perman Lake Road - Tract C230, Etowah County -12 acres.	Sulfur mustard (H, HS, HD), nitrogen mustard (HN-1 and HN3), chlorine (used as decontaminant). Sampled soil for chlorine, arsenic, the mustards, Lewisite (L), 1,4-dithiane, and 1,4 thioxane. Based on the EE/CA, no ordnance was encountered. During the investigation of one area at Site 2A, trace levels of mustard was detected on air monitoring equipment in one soil sample. Additional sampling in the area did not confirm the original detections. An investigation conducted prior to the EE/CA detected TCE in a residential well and TCE and metals in soil.	Privately owned, residence and open pasture area. Area to the west is partially wooded. Area to the east is open pasture. Ownership recently changed. Two new homes recently built. Future land use unknown, but possibly developed for additional residential use. Limited number of homes bordering the area along Perman Lake Road. Army reports state increasing development increases the likelihood of human exposure to contaminants.	Potential for chemical agent contaminated media, particularly in the disposal pit areas is very likely. New owners unaware of the potential hazard have a greater risk of encountering contaminants. Development of the property further increases the likelihood of exposure. Exposure to TCE and other compounds in drinking water may have occurred in the past and may still be occurring.	Previous Army recommendations for land use was for grazing only in tract C230 due to disposal practices (USACE1993). But when the property was transferred in 1948, the recommendation was never established or enforced. ATSDR recommends new and future owner notification. Additionally, due to previous detection of TCE in a residential well and metals detections in soil, ATSDR recommends USACE: further sample this residential drinking water for VOCs, SVOCs, CWM degradation and decontamination chemicals and inorganic compounds (metals). Vapor intrusion and indoor air sampling should be considered if groundwater levels of VOC are elevated.
Site 2B/At 2B (Chemical Land Mine Training Area - Tract C230) Located in central Former Camp Sibert between Steele Station Road and Perman Lake Road (exact location uncertain). Used as area in which chemical land mines were filled, detonated, and possibly buried. Etowah County - 5 acres.	Sulfur mustard (H, HS, HD), nitrogen mustard (HN-1 and HN3), chlorine (used as decontaminant). Sampled soil for chlorine, mustards, 1,4-dithiane, and 1,4 thioxane. Based on the EE/CA, no ordnance or CWM was encountered. Elevated chlorine levels were detected suggesting decontamination.	Privately owned. Area to the west is partially wooded. Area to the east is open pasture. One resident is currently living within the site. Limited number of homes bordering the area along Perman Lake Road.	Area used mustard or CWM, soil samples indicate CWM decontamination using chloride chemical appears successful. Likely exposure to residual CWM or chloride is very low.	ATSDR recommends new and future owner notification including notification in permits and deeds.



ATSDR Health Consultation Former Camp Sibert

Sibert Site Designation Name and Location	Potential Chemicals	Current Use and People Potentially Impacted	Hazard Potential	ATSDR Recommendation
Site 3 (Former Toxic Gas Yard and Burial Site -Tract D340) Located in central former Camp Sibert. Entire site covered approximately 640 acres. Training area encompasses portions of Tract D340 -36 acres including the 22-acre training area.	Sulfur mustard (H, HS, HD), nitrogen mustard (HN-1 and HN3), chlorine (used as decontaminant). Areas of focus were the western portion of Tract D340 and the area immediately west of Tract D340. Property west of Tract D340 was not investigated because the land owner denied right-of-entry to property. No chemical agent or agent breakdown products (ABPs) were detected in the soil samples. However, the USACE considers Site 3 characterization incomplete.	Privately owned. Access for investigation denied. In the 1940s the Army recommended that Tract D340 be used for surface cultivation only and that no wells be drilled. During the 1993 Archive Search and site visit, the survey team identified a large residence adjacent to Tract D340.	Although no CWM was recovered during the Phase II EE/CA investigation of the area investigated, the characterization of Site 3 is not complete. Therefore, the possibility exists for chemical agent or ABPs to remain at the site.	ATSDR recommends new and future owner notification.
Site 4 (Toxic Gas Yard) Located west of Pineview Circle and north of Steele Station Road, in the north-central portion of the former Camp Sibert 4.5 acres.	Sulfur mustard (H, HS, HD), nitrogen mustard (HN-1 and HN3), chlorine (used as decontaminant), and chlorine (used as decontaminant). Industrial chemicals stored at the site may have included FS, FM, CNB, CG, and DM. No chemical agent or ABPs were detected in the four soil samples collected at Site 4.	Privately owned. Partially investigated until property owner retracted right of entry.	Since the investigation at Site 4 was not completed, the possibility exists for chemical agent or degradation products to remain at the site. There is one residence within the site and a limited number of residential dwellings within 1/2 mile. The future land use is expected to remain residential.	ATSDR recommends new and future owner notification.
Site 6 (Chemical Filling Area Demonstration Area-5) Located northwest of the Northeast Alabama Regional Airport - 4 acres.	FS filling. One-ton containers and 55 gallon drums of FS, CNB, and possibly HD. Results of intrusive sampling found non-CWM scrap; thus, no soil samples were collected. Air monitoring did not detect any chemicals.	There are no residences within the site. There are a few homes just outside the area on the northern, southern, and western boundary. Future development is expected to be residential.	Presence of CWM is a remote possibility. Historical reports do not indicate the use of hazardous substances or explosives at this site. Therefore, they were investigated in the EE/CA.	None.
Site 8 (Toxic Munitions Impact Area) Located south within the former Camp Sibert between Little Canoe Creek to the northeast, Old Mockingbird Road to the southwest. Impact area for 4.2-inch mortar rounds filled with various chemicals. 375 acres, St. Clair County	Sulfur mustard (H, HS, HD), nitrogen mustard (HN-1 and HN3), chlorine (used as decontaminant), Phosgene (CG), Lewisite (L), Tearing Agent (CNB, CNS), White Phosphorus (WP, PWP), Fuming Sulfuric Acid (FS), and High Explosives (HE).	The northern 48 acres, consisting of dense pine and hardwood growth, are owned by the Town of Steele Industrial Development Board which has near-term plans for industrial development in that area. Since 2000, development by Town of Steele includes an auto parts manufacturing plant, three wastewater treatment ponds, and a cell phone tower assembly plant. Central 140 acres are privately owned and used for raising cattle. Includes two homes, barn, and farm equipment. Remaining area is under individual private ownership. Some grow timber with some recent clear cutting used as pasture.	Phosgene round found in 2002. Removal action that began in April of 2006 has recovered 18 intact rounds. Samples collected of soil and soil gas of those areas. Hazard potential is moderate at this time.	ATSDR recommends informing current and future owners, developers, and builders including notification in permits and deeds. ATSDR concurs with continued education for local first responders and medical staff.

AS198 Phase I Environmental Study 2008-05-14



ATSDR Health Consultation Former Camp Sibert

AS198 Phase I Environmental Study 2008-05-14

Sibert Site Designation Name and Location	Potential Chemicals	Current Use and People Potentially Impacted	Hazard Potential	ATSDR Recommendation
Site 9 (4.2" Mortar Range) Located approximately 600 feet east of the intersection of Pleasant Valley Road and Steele Station Roads. The suspected site is approximately 15-20 acres.	Based on the EE/CA investigation, no CWM or high explosives were found at this site. Determined to be mini-mortar practice range.	Located in a sparsely populated rural area. Currently used mostly for grazing cattle.	No CWM detected in soil, soil gas, or air.	ATSDR recommends informing current and future owners, developers, and builders including notification in permits and deeds.
Site 11/11A (Possible Munitions Burial Area) North of the intersection of Pleasant Valley Rd and Steele Station Road in the central portion of the former Camp Sibert. 35-50 acres.	Possible munitions and HD drum burial area based on an interview with a former Military Policeman stationed at Camp Sibert. Air monitoring was conducted and briefly indicated the presence of VOCs during the investigation of one of the anomalies. Further air monitoring was negative for VOCs and a soil sample collected from the same area was non-detect for chemical agent and ABPs. The presence of hazardous substances and explosives was not investigated.	The area is currently used as a natural gas compressor station and a private residence.	Only non-CWM scrap (wire, welding rods, barbed wire, etc.) was encountered during the intrusive investigation. Analysis of the soil found no chemical agent or ABPs. The future land use in this area is expected to remain largely undeveloped and sparsely populated.	ATSDR recommends informing current and future owners, developers, and builders including notification in permits and deeds.
Site 12 (Smoke Generator and Possible Munitions Burial Area) Located within the central portion of the former Camp Sibert, along Steele Station Road, adjacent to Site 16. Used as a training area for smoke generation. 10 acres.	Interviewee reported disposal of 37 and 55-gallon drums of HD and mortar-like munitions in ditches 10 to 12 feet long and 12 to 18 inches deep. Access denied by property owner.	A barn is currently located over the suspected burial area.	Since investigations were not conducted, the possibility exists for CWM, chemical agent, or breakdown products to remain at the site.	ATSDR recommends informing current and future owners, developers, and builders including notification in permits and deeds.
Site 13 (Possible Contaminated Equipment Burial Site). Two locations included: 13A and 13B. Approximately 20 to 30 acres on the south side of Steele Station Road, half a block from Highway 77 (Grand Avenue) and Sutton Bridge Road.	Sampled soil in 4 trenches for HD, I, HN1, HN3, 1,4-dithiane, and 1,4 thioxane. Based on EE/CA, no ordnance-related debris or CWM was encountered.	Contains a residence and a business. Future commercial development is imminent as Rainbow City and the city of Attalla grow.	Further development of this area is likely. No evidence of hazard from investigation. Current hazard is low.	ATSDR recommends general information to local community members.

ATSDR Health Consultation Former Camp Sibert



Sibert Site Designation Name and Location	Potential Chemicals	Current Use and People Potentially Impacted	Hazard Potential	ATSDR Recommendation
<p>Site 14 (Possible Munitions Burial Area) Located just east of the former Gate 2 in the northern corner of Sibert. Behind a large white building that may have been the Post Salvage Facility. North of the former cantonment area and adjacent to the Alabama Great Southern Railroad. Approximately 5 acres.</p>	<p>Suspected munitions mixed with debris as reported in interviews. Trash and debris was found during excavation. Sampled soil trenches for HD, L, HN1, HN3, 1,4 dithiane, and 1,4 thioxane. Based on EE/CA, no ordnance-related debris or CWM was encountered.</p>	<p>Currently 2 homes on the site and many homes within ½ mile. Also used for cattle grazing. Future commercial development is imminent as Rainbow City and the city of Attalla grow.</p>	<p>Areas likely to remain light residential and cattle grazing. No evidence of hazard from investigation. Current hazard is low.</p>	<p>ATSDR recommends general information to local community members.</p>
<p>Site 15 (Possible Munitions Burial Area) 45 acres out of 250 possible acres of this site. This site was mentioned by a number of interviewees in the Archival Search Report who placed one or more disposal areas somewhat in the same general vicinity. Located near I-59, Old Pump Station Road (possibly Dumping Station Road), and I-759. The exact location of the burial site could not be determined based on the interviews.</p>	<p>The exact location is not known. Suspected burial site for the disposal of materials such as boots, dishes, trash, and possibly trucks loaded with HD. No CWM or chemical agent contamination was located during the intrusive investigation; however, MEC-related debris encountered in Test Pit #9 included the expended body of a practice 2.36-inch rocket and two flamethrower igniters.</p>	<p>Analysis of the soil samples collected at Site 15 found no evidence of chemical agent or ABPs. There are no homes within the site. I-59 and I 759 border the site on the east and north, respectively. Numerous vehicles use the roadways. ALDOT is planning to extend I-759 to U.S. Highway 431 which will encounter this area.</p>	<p>The presence and extent of hazardous substances was not investigated during this phase, but will be further evaluated under the Phase III Conventional Munitions EE/CA with respect to the ordnance related scrap found at the site. No CWM was detected.</p>	<p>ATSDR recommends general information to local community members.</p>
<p>Site 16 (Air Operations Filling Area) Site 16 is an 11-acre area located at the intersection of Steele Station Road and Periman Lake Road (see Figure 2.2). Site 16 was used for filling airplane spray tanks with chemical agent.</p>	<p>Based on the activities conducted at Site 16, it was believed that excess chemical agent may have been disposed of at the site following the completion of operations. There was no detection of chemical agent or ABPs in any of the soil samples collected at Site 16.</p>	<p>The pull ring from a grenade was found but no grenades or grenade fragments were encountered. During the excavation of Anomaly 16-GA-A, discolored soil was encountered and a composite soil sample was collected. No CWM or chemical agent was encountered during the intrusive investigation of Site 16.</p>	<p>There are no residents currently living within the boundary of Site 16; however, there are a limited number of residential dwellings just outside of the area. Site 16 is currently used as croplands for growing hay. The future land use in this area is expected to remain largely undeveloped and sparsely populated.</p>	<p>ATSDR recommends general information to local community members.</p>

Discussion

Conventional Explosives and CWM Hazards

Several intact mortar rounds have been found at shallow depths between 3 and 14 inches below ground surface. One containing phosgene was found in 2002 by the USACE. Additional rounds have been found during the removal action at Site 8. In 2006, after a USACE sponsored public meeting, two intact rounds were turned over to officials by a citizen who found the items on his property. The citizen kept the live rounds in his garage for nearly 20 years. Some areas likely containing CWM have not been investigated because property owners have not granted the USACE access. These privately-owned sites pose a potential hazard for the current home/property owner and also future owners who are unaware of the hazard potential. Land use restrictions issued by the Army in the 1940s for some parcels to remain as grazing land was either never established or was established and not enforced when the property was transferred to private ownership (Parson 2006).

During archival searches, the USACE found a report of a citizen detonating a live mortar round from Camp Sibert. In 1948, the driver and two passengers of a pickup truck were exposed by an accidental detonation. Their symptoms were consistent with blistering agent “burns”. From past reports and newspaper articles, it appears that contact with conventional munitions, explosives or CWM hazards encountered during ground-disturbing activities are an infrequent occurrence. Although there are no additional reports or evidence that people have detonated CWM or conventional explosives, future land use and development would increase the likelihood that someone could contact hazards from the former Camp Sibert. Detonation of World War II era CWM and munitions is possible and has occurred in other areas of the U.S. Farmers in Europe continue to encounter World War I era CWM in their fields.

Lead by the USACE, environmental investigations have increased the knowledge about areas where hazards may exist. USACE removal actions have decreased the number of CWM that remain. However, despite the tremendous effort, the current scientific investigation methods section land area into grids with each grid containing 100 feet by 100 feet area. Only a small percent of the grids for each area were fully investigated. Safety assurances cannot be made even for the small percent of grids that were fully investigated. Land within grids that did not receive ground penetrating radar or intrusive sampling may still contain CWM or explosive munitions. Heavily wooded areas were not substantially disturbed for investigations. Additionally, some areas suspected of containing potential CWM were not investigated because private land owners denied investigators access.

Future development of former Camp Sibert property for residential, commercial, and industrial uses including ground disturbing activities increases the opportunity for human contact with potential CWM and explosives that may remain just below ground surface. Disturbing soil during land clearing operations and land development could unearth once buried chemical or explosive munitions creating an immediate or future chemical or physical hazard to the machine operators, or people laying pipe or underground utilities, others nearby, and even future land users. Community awareness including training of local emergency personnel (first responders) and property deed notification would reduce the potential for people to contact CWM and explosive hazards that may remain from former Camp Sibert activities.

Residual CWM or Hazardous Chemicals in Private Drinking Water Wells

Samples collected during the 1990 initial assessment by Environmental Science & Engineering found TCE in a residential well located approximately 600 feet from Site 2A burial pits showed concentrations of trichloroethylene at levels that exceeded the State of Alabama groundwater standards. Additional samples collected from other Site 2A areas found TCE and inorganic compounds in groundwater and soil. Although details of the private well sampling are not available, it is possible that the well was used as a residential drinking water source. In 1996, further investigation detected TCE and various metals in soil and in groundwater samples above the U.S. Environmental Protection Agency's Maximum Contaminant Level for drinking water. USACE is continuing to investigate soil and groundwater contamination from former Camp Sibert activities. Samples from private drinking water wells should be included in the current investigation to determine if contaminants released from former Camp Sibert activities have potentially impacted drinking water wells.

Direct Contact with Residual CWM or Hazardous Chemicals in Soil

After 60 years, it is unlikely that chemical agents released from CWM during training exercises during the 1940s would be present in the soil today. Blistering agents are highly reactive upon contact with water or moisture in soil, air, or water. USACE continues to investigate soil, surface water, and groundwater for hazardous chemicals used at Camp Sibert. Sampling results thus far have not detected contaminants in soil detected to date in sufficient amounts to result in adverse health effects.

Mustard Agents

Mustard Agent is also known as sulfur mustard or mustard gas. There are several different chemicals included with the sulfur mustard agents. The military designations include the sulfur mustard (H, HS), distilled mustard (HD), and a mustard blend (HT). Agent H is the chemical bis (2-chloroethyl) sulfide, which contains 20-30% impurities. Agent HD is H that has been purified by washing and vacuum distillation to reduce sulfur impurities (Chemical Abstract Service Registry No. 505-60-2). Agent HT is a blend of 60% HD and 40% Agent T which allows for a lower freezing point and lower volatility.

Nitrogen mustard agents have military designations Nitrogen Mustard 1 (HN-1), Nitrogen Mustard 2 (HN-2), and Nitrogen Mustard 3 (HN-3). HN-1 was the first compound of the HN series developed in the late 1920s. It was designed as a pharmaceutical (to remove warts) and became a military agent. HN-2 was designed as a military agent and became a pharmaceutical used to treat cancer. HN-3 was designed solely as a military agent. These agents are more immediately toxic than the sulfur mustards. However, because of their similar effects, the sulfur mustard and nitrogen mustard discussions are combined below.

Mustard liquid is colorless when pure, but it is normally a yellow to brown oily substance. Mustard agent vapor is colorless with a slight garlic- or mustard-like odor. HN-1 has a faint fishy or musty odor. The mustard agents are only slightly soluble in water. Mustard agents are stable at ambient temperatures and can be active for more than three years in soil. When exposed to the air, mustard agents are stable for weeks under normal atmospheric temperature. Mustard agents hydrolyze in water to form HCl and thiodiglycol (USACHPPM 1999). Mustard agent vapors are heavier than air and settle in low lying areas.

The primary routes of human exposure to sulfur mustards are inhalation and dermal contact. Mustard Agents are vesicants or blistering agents because they cause blistering of the skin and mucous membranes and damage to the respiratory airway. Exposure to sulfur mustard is usually not fatal. The rate of detoxification of mustard agents in the body is very slow and repeated exposures produce a cumulative effect (USACHPPM 1999). People may not know right away that they have been exposed, because sulfur mustard often has a smell that might not cause alarm. Typically, signs and symptoms do not occur immediately. Depending on the severity of the exposure, symptoms may not occur for 2 to 24 hours. Some people are more sensitive to mustard than are other people, and may have symptoms sooner. Exposure is particularly harmful around sweaty parts of the body. It is also more harmful to the skin on hot, humid days, or in tropical climates.

Mustard agents can have the following effects on specific parts of the body that contact the liquid mustard agent directly or by breathing the vapor: Showing these signs and symptoms does not necessarily mean that a person has been exposed to mustard agent (ATSDR 2002). *Skin*: redness and itching of the skin may occur 2 to 48 hours after exposure and change eventually to yellow blistering of the skin. *Eyes*: irritation, pain, swelling, and tearing may occur within 3 to 12 hours of a mild to moderate exposure. A severe exposure may cause symptoms within 1 to 2 hours and may include the symptoms of a mild or moderate exposure plus light sensitivity, severe pain, or temporary blindness. *Respiratory tract*: runny nose, sneezing, hoarseness, bloody nose, sinus pain, shortness of breath, and cough within 12 to 24 hours of a mild exposure and within 2 to 4 hours of a severe exposure. *Digestive tract*: abdominal pain, diarrhea, fever, nausea, and vomiting (CDC 2002).

Mustard has been determined to be a human carcinogen by the International Agency for Research on Cancer based on studies of people who routinely work with mustard chemicals which indicate that exposures causing chronic irritation for longer than one year may lead to respiratory disease and possibly cancer of the upper respiratory airways. Nitrogen mustards may cause bone marrow suppression beginning as early as 3 to 5 days after exposure. Bone marrow suppression may lead to anemia, bleeding, and increased risk for infection. The people in these studies were exposed to mustard at much higher levels than likely present today at the former Camp Sibert. Because of the strong irritation effects of mustard chemicals, repeated exposures are unlikely in non-occupational situations.

There are no scientific reports of children exposed to mustard agents. However, children exposed to mustard agents are likely to experience the same toxic effects experienced by exposed adults. Children may be more vulnerable to corrosive agents than adults because of the smaller diameter of their airways. Scientific studies of mustard agents did not show birth defects in rats that breathed it. We do not know if these substances can cause birth defects or other developmental effects in humans.

Lewisite

Lewisite is the chemical chlorovinyldichloroarsine, known by its military designation (L). Lewisite was produced in 1918 to be used in World War I, but its production was too late for it to be used in the war (CDC 2002). Pure Lewisite is colorless; however, it usually appears as an amber to dark brown oily liquid with very little odor. The vapor has a geranium-like odor.

In the environment, Lewisite is somewhat less stable than mustard agents at ambient temperatures. However, if buried, Lewisite can be active for more than three years in soil. When exposed to the air, Lewisite is stable for weeks under normal atmospheric temperature. However, in presence of moisture,



it hydrolyses rapidly, losing its ability to blister. Hydrolysis in water forms hydrochloric acid and a nonblistering arsenic compound (USACHPPM 1998).

The primary routes of human exposure to Lewisite are inhalation, ocular, and dermal contact. Lewisite is a vesicant or blistering agent because it causes blistering of the skin and mucous membranes and damage to the respiratory airway like mustard agents. Additionally, Lewisite acts as a systemic poison, causing pulmonary edema, diarrhea, restlessness, weakness, subnormal temperature, and low blood pressure.

Lewisite presents both a vapor and liquid hazard and may damage the eyes, skin, respiratory tract, and circulatory system. Exposure to Lewisite causes immediate (within 30 seconds) irritation or pain. The vapor may be inhaled into the respiratory tract, causing the immediate onset of burning pain, irritation of the nose, and reflex coughing and chest tightness. The vapor also affects the eyes, with the immediate onset of pain and redness. The vapor or a liquid splash of Lewisite on the skin may cause immediate stinging pain and nonvesicant arsenic compound

Signs and symptoms occur immediately following a Lewisite exposure. Showing these signs and symptoms does not necessarily mean that a person has been exposed to Lewisite. Lewisite can have the following effects on specific parts of the body: *Skin*: pain and irritation within seconds to minutes, redness within 15 to 30 minutes followed by blister formation within several hours. The lesions (sores) from Lewisite heal much faster than lesions caused by the other blistering agents, sulfur mustard and nitrogen mustards, and the discoloring of the skin that occurs later is much less noticeable. *Eyes*: irritation, pain, and tearing may occur on contact, uncontrollable blinking and swelling of the eyelids. *Respiratory tract*: runny nose, sneezing, hoarseness, bloody nose, sinus pain, shortness of breath, and cough. *Digestive tract*: diarrhea, nausea, and vomiting. *Cardiovascular*: "Lewisite shock" or low blood pressure may occur. Lewisite is not known to suppress the immune system.



Phosgene

Phosgene is the chemical carbonyl chloride, known by its military designation as (CG). It is a corrosive, highly toxic gas that produces a fluid buildup in the lungs. Phosgene was used extensively during World War I as a choking (pulmonary) agent. Today, it is a major industrial chemical used to make plastics and pesticides.

Phosgene gas may appear colorless or as a white to pale yellow cloud. At low concentrations, it has a pleasant odor of newly mown hay, but its odor may not be noticed by people exposed. At room temperature, phosgene is a poisonous gas. Phosgene gas can be converted into a liquid by cooling and pressure so that it can be shipped and stored. When liquid phosgene is released, it quickly turns into a gas that is heavier than air so it stays close to the ground.

Exposure to phosgene may cause delayed effects that may not be apparent for up to 48 hours after exposure, even if the person feels better or appears well following removal from exposure. Showing these signs or symptoms does not necessarily mean that a person has been exposed to phosgene. Phosgene affects the upper respiratory tract, skin, and eyes and causes severe respiratory damage as well as burns to the skin and eyes. Acute inhalation may cause respiratory and circulatory failure, coughing, feeling of suffocation, burning sensation in the throat and eyes, watery eyes, blurred vision, difficulty breathing or shortness of breath, nausea and vomiting. *Skin:* lesions similar to those from frostbite or burns. *Respiratory:* At high concentrations of phosgene, a person may develop fluid in the lungs (pulmonary edema) within 2 to 6 hours, rapid progression to pulmonary edema and pneumonia. Most people who recover after an exposure to phosgene make a complete recovery. However, chronic bronchitis and emphysema have been reported as a result of chronic inhalation of phosgene.



Table 2 – Summary of ATSDR’s Public Health Findings and Recommendations

Exposure Situation	Population	Possible Chemicals	ATSDR’s Public Health Findings	Recommendations
Ground Disturbing Activities	Adults and Children Residents and Land Developers	Contacting Chemical Warfare Agents and Explosive Munitions	CWM and explosive munitions that remain intact from past operations could cause immediate and substantial harm if contents are released (usually from significant force being applied). Currently contact with these materials is not occurring. The number of items remaining is probably low. However, planned development increases the chance for people to come in contact with these materials.	ATSDR recommends that USACE, state, and local environmental and health agencies work together to continue to provide public education about the potential hazards of former Camp Sibert property to current and future property developers and owners as well as first responders until deed notification can be achieved.
Drinking and indoor uses of Private Residential Wells	Adults and Children Residents	Drinking Water Containing Trichloroethylene (TCE) and Other Chemicals	Contamination of private wells on former Camp Sibert property has not been fully investigated, but was detected in 1990.	ATSDR recommends that private drinking water wells on former Camp Sibert property be sampled at the taps for chemicals including VOCs, SVOCs, inorganics, and CWM degradation and decontamination products. Vapor intrusion should be considered and indoor air sampled if groundwater values are elevated. ATSDR will work with the USACE, state, and local environmental and health agencies to encourage private well owners to allow their taps to be sampled for public health reasons.
Direct Contact with Soil	Adults and Children Residents and Land Developers	Touching Soil Possibly Containing Chemicals such as Chemical Warfare Agents	Soils collected during USACE investigations have not been found to contain CWM or hazardous chemicals at harmful levels.	None.

AS198 Phase I Environmental Study 2008-05-14



Managing Future Hazards

Despite investigations and removal actions with state of the art technical equipment, 100 percent safety assurances for the grids receiving investigation cannot be guaranteed. In areas that did not receive complete investigation, there greater risks may exist. To prevent or reduce the inherent risks associated with the hazards that remain, institutional controls must be implemented.

As part of the former Camp Sibert 2005 EE/CA, the USACE performed an analysis of possible institutional controls. These strategies rely on existing powers and authorities of other government agencies to protect the public. Based on interviews with authorities, the USACE assessed their capabilities and determination and willingness to support and enforce short and long-term institutional control measures.

However, at this time there are no mechanisms for establishing land use restrictions, deed notification, or access control. Therefore, the USACE recommends managing the remaining hazards through public awareness programs.

Brochures and Fact Sheets	2B, 8, 9, 13, 14
Newspaper Articles	2B, 8, 9, 13, 14
Information Packages to Public Officials	2B, 8, 9, 13, 14
Audio/Visual Media	2B, 8, 9, 13, 14
Classroom Education	2B, 8, 9, 13, 14

Based on current existing powers and authorities of other governmental agencies, there are no mechanisms for notification in deeds, permits, or signage for private property. There are no mechanisms in place to officially inform land developers, private utility workers, or potential buyers of the hazards of these properties. Public awareness programs, education, and media coverage should continue in the future until institutional controls can be established and enforced.

Community Health Concerns

- 1. Local citizens have expressed concern that chemical warfare agents buried 60 years ago may be emanating up through the soil and presenting a hazard to the community and chemically sensitive individuals.**

Environmental samples of soil, soil gas, and air collected during investigations detected chemical warfare agents and hazardous chemicals in several locations at some sites investigated. Chemical agents used at Camp Sibert require direct contact of the skin, eyes, or respiratory tract with the liquid or chemical vapors. Slow, small releases of blistering agent in a field would present minimal hazard to people living 200 yards away as long as the people stay away from the chemicals. However, a farmer or land developer who unknowingly unearths buried munitions with force, would present more of an immediate hazard due to direct contact with released chemical agent or explosive materiel.

Live intact mortar rounds containing chemical warfare agents have been found at shallow depths under the ground surface, but unless disturbed do not pose a hazard. The chemical warfare agents used at Camp Sibert become ineffective when exposed to air, warm temperature, and water. Therefore, residual chemical agents are not expected to be present in ambient air on or surface soils. Of greatest health concern are the intact rounds that could be accidentally disturbed by digging. Pressure applied to intact rounds may cause the rounds to spray their contents with sufficient energy that people be severely harmed. People who inhale or touch the chemical agent spray or those who contact the spray indirectly may suffer severe health effects.

The lack of reported incidents of citizens coming in contact with CWM from Camp Sibert indicates that much of the land has remained undisturbed and/or the amount of CWM is few and inaccessible. Future development of the Camp Sibert property increases the risk of encountering potentially hazardous materials.

The health effects a person may experience from contact with hazardous chemicals depend on the amount of chemical to which someone is exposed, the route of exposure (i.e., inhalation), and the duration of exposure. A person's individual sensitivities and pre-existing health conditions also play a role in the health effect and outcome. Much less chemical would be required to produce an effect in a chemically sensitive person than would the average person. Little scientific information is available regarding the response of chemically sensitive individuals to the chemicals used at the former Camp Sibert. Occupational studies of workers using chemical agents have shown that 1) repeated exposures can produce a greater effect and 2) some workers are more sensitive to chemical mustard agent and may show symptoms at a lower dose than other workers. Dose levels at which sensitive workers have shown effects are dependent on the specific individual and the amount and frequency of their previous exposures. Information in the scientific literature is limited regarding the amount of chemical exposure required to produce adverse health effects in previously chemical-sensitized individuals.



2. Citizens have expressed concern about buildings or schools being built over a former chemical weapons burial ground and whether air quality in the schools or buildings presents a hazard to students or workers.

Although the USACE has not sampled air inside buildings and schools for chemical agents, there is no reason to believe that this scenario is occurring. Large numbers of people would be affected at the same time if air quality inside buildings and schools were impacted by chemical agents. Moreover, the ability of contaminants below the ground to migrate into schools and commercial buildings is minimized for schools and buildings built on slab foundations. The mild local climate and frequency that people open doors to enter buildings reduces the indoor pressure gradient resulting in conditions insufficient to permit vapor intrusion.

As the USACE investigations continue and additional environmental samples are collected, more information will be available to characterize the extent of contamination and identify the potential for people to come in contact with contaminants remaining from activities conducted at the former Camp Sibert.

Conclusions and Recommendations

ATSDR identified potential exposure situations most likely to occur from materiel associated with the former Camp Sibert. They are as follows: 1) adults and children could come in contact with conventional explosives or CWM hazards encountered during ground-disturbing activities, 2) adults and children could come in contact with residual CWM, explosive, or hazardous chemicals (including degradation chemicals) by drinking potentially contaminated water from their private drinking water wells, and 3) adults and children could come in contact with residual CWM, explosive, or hazardous materials by direct contact with contaminated soil or unearthed material.

Adults and children could come in contact with conventional explosives or CWM hazards encountered during ground-disturbing activities.

- 1) ATSDR believes that the former Camp Sibert poses a current and future public health hazard because conventional munitions, explosives, or CWM hazards are likely present on privately owned residential and commercial properties close to the ground surface where ground disturbance could cause detonation resulting in significant harm. The USACE has conducted several activities to reduce the likelihood of exposures. However, additional public health actions are needed to further reduce the likelihood of exposure.
- 2) USACE investigations and removal actions have reduced the opportunity for people to come in contact with CWM and munitions hazards in those areas investigated. However, despite the removal of 18 intact, liquid-filled 4.2-inch (diameter) mortars, CWM and explosive munitions likely remain near the surface on private residential, agricultural, and commercial property that is former Camp Sibert property.
- 3) Some areas suspected of containing potential CWM were not investigated because private land owners denied investigators access. Hazards in these areas (approximately 36 acres) could be higher than areas where live, fused, munitions were found.
- 4) Future development of former Camp Sibert property for residential, commercial, and industrial uses, including ground disturbing activities, increases the opportunity for human contact with CWM and explosives munitions which could result in significant harm.
- 5) Based on current existing powers and authorities of other governmental agencies, there are no mechanisms for notification in deeds, permits, or signage for private property. There are no mechanisms in place to officially inform land developers, private utility workers, or potential buyers of the hazards of these properties.

ATSDR recommends that USACE, state, county, and local environmental and health agencies work together to continue to provide public awareness and education about the hazards of former Camp Sibert property to current and future property developers, private utility workers, emergency first responders and private property owners. Public



awareness programs, education, and media coverage should continue in the future until institutional controls can be established and enforced.

Adults and children could come in contact with residual CWM or hazardous chemicals by drinking potentially contaminated water from their private drinking water wells.

- 6) Past investigations detected trichloroethylene (TCE) in samples from a private well, groundwater, and soil located near Site 2A. Further investigation detected TCE and various metals in soil and in groundwater samples above the U.S. Environmental Protection Agency's Maximum Contaminant Level for drinking water. Although the details of earlier private well sampling is not available, it is possible that the well was used as a residential drinking water source.
- 7) USACE is currently investigating soil and groundwater contamination from former Camp Sibert activities. Private drinking water wells are currently included in the sampling protocol. At this time, the private property owners have not granted access to USACE for further investigation.

ATSDR recommends that private drinking water wells be sampled at the taps for chemicals including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), inorganics, and CWM degradation and decontamination products. Additionally, vapor intrusion into homes and buildings should be considered and indoor air sampled as necessary. ATSDR will work with the USACE, state, and local environmental and health agencies to encourage private well owners to allow their taps to be sampled for public health reasons.

Adults and children could come in contact with residual CWM or hazardous chemicals by direct contact with contaminated soil.

- 8) The CWM used at Camp Sibert that were released into the environment would have reacted with moisture in the soil and air. CWM released during the time that Camp Sibert was operating would not be reactive today.
- 9) Residual explosive compounds, VOCs, inorganic compounds, and chlorine used during decontamination may be detectable in soil. Contaminants in soil occur in concentrated areas and are not widespread. Although environmental investigations continue, soil contaminant levels detected to date do not appear to be high enough to cause harmful health effects in people who might directly contact contaminants in soil.



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APPENDIX E
S&ME, INC. PROPOSAL



AGREEMENT FOR SERVICES

Form AS-071

Date: December 17, 2007	Job Number: 1464-08-003
S&ME, Inc. (hereafter Consultant)	Client Name: Etowah County Commission (hereafter Client)
Address: 2713 Kanasita Drive City: Hixson State: TN Zip: 37343	Address: 800 Forrest Avenue City: Gadsden State: Alabama Zip: 35901
Telephone: 423-826-2110 Fax: 423-870-1005	Telephone: 256-549-5495 Fax: 256-549-5400
PROJECT	
Project Name: Preliminary Site Studies	
Project location: (Street Address) Little Canoe Creek Industrial Park	
City: Gadsden	State: AL Zip:
SERVICES TO BE RENDERED	
Proposal Number: 618407178 dated: December 17, 2007 is incorporated into this Agreement For Services. This Agreement For Services is incorporated into the above Proposal.	

Client desires to contract with Consultant for the Services to be Rendered (Services) on Client's Project, as contained in Consultant's Proposal. The Proposal and Client's Project are referenced immediately above.

THEREFORE, in consideration of the Mutual Covenants and Promises included herein, Client and Consultant agree as follows:

- 1. ACCEPTANCE:** Client hereby accepts this offer by Consultant to provide the Services as contained in Consultant's Proposal and agrees that such Services and any additional Services authorized by Client shall be governed by the terms of this Agreement. If Client directs that Services commence prior to execution of this Agreement, Client agrees that commencement of Services by Consultant is in reliance on Client having accepted the terms of this Agreement and acknowledgment that Client will execute this Agreement, forthwith. Client may accept this Agreement for Services through the use of Client's Purchase Order, however all preprinted terms and conditions on Client's purchase order are inapplicable and the terms of this Agreement shall govern. Unless this offer is previously accepted, it will be withdrawn automatically at 5:00 pm EST, ninety (90) days from the date of issue.
- 2. CONTRACT DOCUMENTS:** "Contract Documents" shall mean this Agreement for Services, the Proposal identified under "SERVICES TO BE RENDERED," and any modifications, extensions, and additions to the "Services to be Rendered" that Consultant has performed or may perform for Client.
- 3. PAYMENT:** Client will pay Consultant for Services and expenses in accordance with the Contract Documents. If prices for Services are not specified in the Contract Documents, Consultant's current fee schedule in effect for the location providing the Services shall control. Consultant will submit progress invoices to Client monthly and a final invoice upon completion of Services. Payment is due upon receipt of the invoice unless otherwise agreed to in writing prior to the submittal of the invoice. Invoices are past due 30 calendar days after the date of the invoice. Past due amounts are subject to a late fee of one and one-half percent per month (18 percent per annum) or the highest amount allowed by applicable law on the outstanding balance, whichever is less. Attorney's fees and other costs incurred in collecting past due amounts shall be paid by Client. The Client's obligation to pay under this Agreement is in no way dependent upon the Client's ability to obtain financing, payment from third parties, approval of governmental or regulatory agencies, or Client's successful completion of the Project.

Consultant shall be paid in full for all Services rendered under this Agreement, including any additional Services authorized by Client. However, if Client objects to all or any portion of any invoice, Client shall so notify Consultant in writing of the objection within fifteen (15) days from date of invoice, give reasons for the objection, and pay that portion of the invoice not subject to Client's objection. Client and Consultant will informally discuss Client's objections to the invoice and attempt to reach a resolution mutually acceptable to Client and Consultant. If Client or Consultant determine that an informal resolution is not possible, then that party shall so state in writing to the other party and initiate a

final resolution pursuant to the Dispute Resolution provisions of this Agreement for Services. If the Client does not object in writing to all or a portion of the invoice within fifteen (15) calendar days from date of invoice, then the full amount of the invoice is due and payable and all objections are waived.

Without incurring any liability to the Client, Consultant may either suspend or terminate this Agreement if Client fails to pay any undisputed invoice amounts within 60 calendar days of the invoice date, or if Client states its intention not to pay forthcoming invoices. Such suspension or termination will not waive any other claim Consultant may have against Client. Following such suspension or termination, Consultant may resume work by mutual agreement with Client after payment by Client of all outstanding invoiced amounts and collection expenses. Client waives all claims for damages or delay as a result of such suspension or termination.

Any invoices that remain unpaid thirty (30) calendar days after Client's receipt of letter from Consultant demanding payment of the invoices or notification of a collection action by an attorney or collection agency shall constitute a release of Consultant by Client from any and all claims whatsoever, including, but not limited to, tort or contractual claims which Client may have against Consultant for Services performed under said invoice(s).

4. **STANDARD OF CARE AND WARRANTY DISCLAIMER:** Consultant and its agents, employees and subcontractors shall endeavor to perform the Services for Client with that degree of care and skill ordinarily exercised, under similar circumstances, by consultants practicing in the same discipline at the same time and location. In the event any portion of the Services fails to substantially comply with this standard of care obligation and Consultant is promptly notified in writing prior to one year after completion of such portion of the Services, Consultant will re-perform such portion of the Services, or if re-performance is impractical, Consultant will refund the amount of compensation paid to Consultant for such portion of the Services. **THE REMEDIES SET FORTH HEREIN ARE EXCLUSIVE AND NO WARRANTY OR GUARANTEE, EITHER EXPRESS OR IMPLIED IS MADE OR INTENDED BY THIS AGREEMENT or by any report, opinion, or other Instrument of Service provided pursuant to this Agreement.**
5. **LIMITATION OF REMEDIES: CONSULTANT'S AGGREGATE LIABILITY RESPONSIBILITY TO CLIENT, INCLUDING THAT OF OUR OFFICERS, DIRECTORS, EMPLOYEES AND AGENTS, IS LIMITED TO \$50,000 OR THE AMOUNT OF CONSULTANT'S TOTAL FEE UNDER THIS AGREEMENT, WHICHEVER IS GREATER, HEREINAFTER REFERRED TO AS LIMITATION OF REMEDY. THIS LIMITATION OF REMEDY APPLIES TO ALL LAWSUITS, CLAIMS OR ACTIONS, WHETHER IDENTIFIED AS ARISING IN TORT, CONTRACT, INCLUDING NEGLIGENCE (WHETHER SOLE OR CONCURRENT), PROFESSIONAL ERROR OR OMISSIONS, BREACH OF WARRANTY (EXPRESS OR IMPLIED), NEGLIGENT MISREPRESENTATION, AND STRICT LIABILITY, OR OTHER LEGAL THEORY, INCLUDING WITHOUT LIMITATION, CONSULTANT'S INDEMNITY OBLIGATIONS TO CLIENT RELATED TO THE SERVICES PROVIDED IN THIS AGREEMENT AND ANY CONTINUATION OR EXTENSION OF OUR SERVICES.**

IF CLIENT DESIRES A HIGHER LIMITATION OF REMEDY, CONSULTANT MAY AGREE, AT CLIENT'S REQUEST, TO INCREASE THE LIMITATION OF REMEDY TO A GREATER SUM IN EXCHANGE FOR A NEGOTIATED INCREASE IN FEE. ANY ADDITIONAL CHARGE FOR A HIGHER LIMITATION OF REMEDY IS CONSIDERATION FOR THE GREATER RISK ASSUMED BY CONSULTANT AND IS NOT A CHARGE FOR ADDITIONAL PROFESSIONAL LIABILITY INSURANCE. ANY AGREEMENT TO INCREASE THE LIMITATION OF REMEDY MUST BE MADE IN WRITING AND SIGNED BY BOTH PARTIES IN ADVANCE OF THE PROVISION OF SERVICES UNDER THIS AGREEMENT.

BY ENTERING INTO THIS AGREEMENT, CLIENT ACKNOWLEDGES THAT THIS LIMITATION OF REMEDIES PROVISION HAS BEEN REVIEWED, UNDERSTOOD AND IS A MATERIAL PART OF THIS AGREEMENT, AND THAT CLIENT HAS HAD AN OPPORTUNITY TO SEEK LEGAL ADVICE REGARDING THIS PROVISION.

6. **DISCLAIMER OF CONSEQUENTIAL DAMAGES:** In no event shall Consultant or Client be liable to the other for any special, indirect, incidental or consequential loss or damages, including, but not limited to, lost profits, damages for delay, or loss of use arising from or related to Services provided by Consultant.
7. **REPORTS:** In connection with the performance of the Services, Consultant shall deliver to Client one or more reports or other written documents reflecting Services provided and the results of such Services. All reports and written documents delivered to Client are instruments reflecting the Services provided by Consultant pursuant to this Agreement and are made available for Client's use subject to the limitations of this Agreement. Instruments of Service provided by Consultant to Client pursuant to this Agreement are provided for the exclusive use of Client, and Client's agents and employees for the Project and are not to be used or relied upon by third parties or in connection with other projects. Subject to the authorized use of Client, and Client's agents, and employees, all Instruments of Service, other written documents, all original data gathered by Consultant and work papers produced by Consultant in the performance of or intrinsic to the Services included in the Services are, and shall remain, the sole and exclusive property of Consultant.

Documents that may be relied upon by Client are limited to the printed copies (also known as hardcopies) that are signed or sealed by Consultant. Files in electronic media format of text, data, graphics, or of other types that are furnished by Consultant to Client are only for the convenience of Consultant and Client. Any reliance on information obtained or derived from such electronic files will be at the Client's or other user's sole risk. Data stored in electronic format can deteriorate or be modified inadvertently or otherwise. Consultant shall not be responsible to maintain documents stored in electronic media. When transferring documents in electronic media format, Consultant makes no representations as to long-term compatibility, usability, or readability of such media format.

Consultant shall not be responsible for any alterations, modifications, or additions made in the electronic data by the Client or any reuse of the electronic data by the Client or any other party for this Project or any other project without Consultant's written consent.

Client shall indemnify, and hold Consultant harmless against any claims, damages or losses arising out the reuse of the electronic data without Consultant's consent or arising out of alterations, modifications, or additions to the electronic data made by anyone other than Consultant.

Any instruments of Service, including reports, generated as part of this Agreement are intended solely for use by Client and shall not be provided to any other person or entity without Consultant's written authorization. To the fullest extent permitted by law, Client shall indemnify and hold harmless Consultant from and against any action or claim brought by any person or entity claiming to rely on the information or opinions contained in the Instrument of Service without Consultant's written authorization.

8. **SAFETY:** Consultant will maintain a safety program for its employees. Consultant specifically disclaims any authority or responsibility for general job safety and for the safety of persons who are not employed by Consultant. Should Client, or third parties, be conducting activities on the Site, then each shall have responsibility for their own safety and compliance with applicable safety requirements.

Field Personnel: The presence of Consultant's field personnel, either full-time or part-time, may be for the purpose of providing project administration, assessment, observation or field testing of specific aspects of the Project as authorized by Client. Should Client retain the Services of a Contractor(s) for the Project, Consultant is not responsible in any way whatsoever for the supervision or direction of the work of the Contractor(s), its employees or agents. The presence of Consultant's field personnel for project administration, assessment, observation or testing shall not relieve the Contractor(s) of his responsibility for performing work in accordance with the project plans and specifications.

If a Contractor (not a subcontractor of Consultant) is involved in the Project, Client agrees, in accordance with generally accepted construction practices, that the Contractor will be solely responsible for working conditions on the jobsite, including safety of all persons and property during performance of the work, and compliance with OSHA regulations. These requirements will apply continuously and will not be limited to normal working hours. It is agreed that Consultant does not have the duty or right to stop the work of the Contractor.

9. **SAMPLES:** Unless otherwise requested, test specimens or samples will be disposed of immediately upon completion of tests and analysis. Upon written request, Consultant will retain samples for an agreed to duration and for a mutually acceptable storage charge. In the event that samples contain or may contain hazardous materials, Consultant shall, after completion of testing and at Client's expense, return such samples to Client or make samples available for disposal by Client's agent. Client recognizes and agrees that Consultant is acting as a bailee and at no time assumes title to said samples.
10. **INVENTIONS:** Any and all inventions or discoveries relating to the Services, including improvements and modifications to existing products or processes made or conceived by Consultant or its employees during the term of this Agreement are and shall remain the sole and exclusive property of Consultant.
11. **REPRESENTATIONS OF CLIENT:** Client warrants and covenants that sufficient funds are available or will be available upon receipt of Consultant's invoice to make payment in full for the Services rendered by Consultant. Client warrants that all information provided to Consultant regarding the Project and Project location are complete and accurate to the best of Client's knowledge.
12. **CLIENT OBLIGATIONS:** Client agrees to furnish Consultant, its agents, employees, and subcontractors a right-of-entry and any authorizations needed for Consultant to enter onto the project site to perform the Services included in this Agreement. Consultant will take reasonable precautions to minimize damage to the Project Site from Consultant's activities and from the use of equipment. Client recognizes that the performance of the Services included in this Agreement may cause alteration or damage to the Site. Client acknowledges that some site disturbance is inherent in the work for which Consultant will not be responsible. Should Client not be owner of the property, then Client agrees to notify the owner of the aforementioned possibility of unavoidable alteration and damage and to indemnify, and hold harmless Consultant against any claims and claims related costs including attorney's fees by the owner or persons having possession of the site through the owner which are related to such alteration or damage.
13. **UTILITIES:** Client agrees to disclose the identity of all utilities serving the Project Site and the presence and accurate location of hidden or obscured man-made objects known to Client that may be in Consultant's work area. Client agrees to indemnify and hold harmless Consultant from all claims, suits, losses, personal injuries, death, and property liability including costs and attorney's fees resulting from damage or injury to utilities or subterranean structures (pipes, tanks, etc.) arising from the performance of Consultant's Services when the existence of such are not called to Consultant's attention or the location not correctly identified in information furnished Consultant.
14. **CERTIFICATIONS:** Client agrees not to require that Consultant execute any certification with regard to work performed, tested or observed under this Agreement unless: 1) Consultant believes that it has performed sufficient work to provide a sufficient basis to issue the certification; 2) Consultant believes that the work performed, tested or observed meets the criteria of the certification; and 3) Consultant has reviewed and approved in writing the exact form of such certification prior to execution of this Agreement. Any certification by Consultant is limited to an expression of professional opinion based upon the Services performed by the Consultant, and does not constitute a warranty or guarantee, either expressed or implied.
15. **FAILURE TO FOLLOW RECOMMENDATIONS:** The Client agrees that it would be unfair to hold the Consultant liable for problems that may occur if the Consultant's recommendations are not followed. Accordingly, the Client waives any claim against the Consultant, and agrees to indemnify, and hold harmless the Consultant from any claim or liability for injury or loss that results from failure to implement the Consultant's recommendations or from implementation of the Consultant's recommendations in a manner that is not in strict accordance with them.

AS-071

VER 1, Rev 2 -- 04-05-07

3 of 5

16. **SCOPE OF SERVICES AND EXCLUDED SERVICES:** Consultant's engagement under this Agreement includes only those Services specified in the Scope of Services. Client agrees it will not seek to hold Consultant responsible and expressly waives any claim against Consultant for not performing additional services that Client instructed Consultant not to perform, not performing additional services that were not specifically requested by Client and agreed to by both parties, and not performing recommended additional services that Client has not authorized Consultant to perform.
17. **TERMINATION:**
For Convenience - Upon written notice, Client or Consultant may terminate the performance of any further Services included in this Agreement if the terminating party determines termination is in the terminating party's interest. Upon receipt of a termination notice by either party, Consultant shall stop work on all Services included in this Agreement and deliver any instruments of Service complete at that time to Client and Client shall pay Consultant within thirty (30) days for all Services performed up to the dispatch or receipt of the termination notice. Upon Termination for Convenience, Consultant and Client shall have no further rights or remedies other than those included in this paragraph.

For Cause - In the event of material breach of this Agreement, the party not breaching the Agreement may terminate it upon ten (10) days written notice delivered or mailed to the other party, which notice must identify the material breach. The Agreement may not be terminated for cause if the breaching party cures the breach within ten (10) days of receipt of the written notice. Upon Termination for Cause, Consultant shall stop work on all Services included in this Agreement and deliver any instruments of service complete at that time to Client and Client shall pay Consultant within thirty (30) days for all Services performed up to the termination. Upon Termination for Cause, Consultant and Client shall have no further rights or remedies other than those included in this paragraph.
18. **UNFORESEEN CONDITIONS OR OCCURRENCES:** If, during the performance of Services, any unforeseen hazardous substance, material, element or constituent or other unforeseen conditions or occurrences are encountered which, in Consultant's judgment, significantly affects or may affect the Services, the risk involved in providing the Services, or the recommended Scope of Services, Consultant will promptly notify Client. Subsequent to that notification, Consultant may: (a) If practicable, in Consultant's judgment and with approval of Client, complete the original Scope of Services in accordance with the procedures originally intended in the Proposal; (b) Agree with Client to modify the Scope of Services and the estimate of charges to include the previously unforeseen conditions or occurrences, such revision to be in writing and signed by the parties and incorporated into this Agreement; or (c) Terminate the Services effective on the date of notification pursuant to the terms of TERMINATION FOR CONVENIENCE. Client is responsible for reporting any releases of hazardous substances to appropriate government agencies as required by law. Client acknowledges that Consultant also may have reporting obligations under controlling law and regulations. Client waives any claim against Consultant and will indemnify and hold Consultant harmless from any claim, injury or loss arising from the discovery of unforeseen hazardous substances.
19. **FORCE MAJEURE:** Consultant shall not be deemed to be in default of this Agreement to the extent that any delay or failure in the performance of the Scope of Work results from any causes beyond its reasonable control. For this purpose, such acts or events shall include, but are not limited to, storms, floods, unusually severe weather, epidemics, civil disturbances, war, riot, strikes, lockouts or other industrial disturbances, and the inability within reasonable diligence to supply personnel, equipment, information or material to the Project. In the event that such acts or events occur, it is agreed that Consultant shall attempt to overcome all difficulties arising and to resume as soon as reasonably possible the normal pursuit of the Services covered by this Agreement.
20. **INSURANCE:** Consultant shall maintain at its own expense the following insurance subject to normal industry exclusions: (1) Worker's Compensation Insurance and Employer's Liability Insurance; (2) Commercial Automobile Liability Insurance with limits of \$1,000,000.00; (3) Commercial General Liability Insurance with limits of \$1,000,000.00; and (4) Professional Liability Insurance. Certificates can be issued upon request identifying details and limits of coverage.
21. **INDEMNITY:** Client agrees to indemnify, and save harmless Consultant, its agents, employees, and subcontractors from and against any and all losses, liabilities, and costs and expenses of every kind (including cost of defense, investigation, settlement, and reasonable attorney's fees), which Consultant, its agents, employees, and subcontractors may incur, become responsible for, or pay out as a result of bodily injuries (including death) to any person, damage to any property, or both, to the extent caused by Client's negligence or willful misconduct.

Subject to Article 5, Consultant agrees to indemnify, and save harmless Client from and against any and all losses, liabilities, and costs and expenses of every kind (including cost of defense, investigation, settlement, and reasonable attorney's fees) which Client may incur, become responsible for, or pay out as a result of bodily injuries (including death) to any person, damage to any property, or both, to the extent caused by Consultant's negligence or willful misconduct.

Subject to Article 5, Client and Consultant shall, in the event of liability arising out of their joint negligence or willful misconduct indemnify, and save harmless each other in proportion to their relative degree of fault.
22. **DISPUTE RESOLUTION:** Consultant may, in Consultant's sole discretion, pursue collection of past due invoices by litigation in a court of competent jurisdiction. Other than Consultant's collection of past due invoices, in the event of a dispute between Consultant and Client with regard to any matter arising out of or related to this Agreement, the Parties will use their best efforts to resolve the dispute amicably within fifteen (15) calendar days. If the dispute cannot be settled amicably, the Parties agree that the dispute shall be subject to mediation in accordance with the mediation rules of the American Arbitration Association or similar dispute resolution organization if the parties expressly agree. Except for collection actions by Consultant, mediation in good faith shall be a condition

precedent to the institution of litigation by either party. Once a party files a request for mediation with the other party and with the American Arbitration Association, or similar dispute resolution organization, the parties agree to commence such mediation within thirty (30) days of the filing of the request. The costs of such mediation shall be borne equally by both Parties. If the dispute is not resolved after such mediation, then the dispute shall be resolved by litigation in a court of competent jurisdiction within the State where project is located.

23. **CAPTIONS AND HEADINGS:** The captions and headings in this Agreement are for convenience and reference only, and the words contained therein shall in no way be held or deemed to define, limit, describe, modify, or add to the interpretation, construction, or meaning of any provision of or scope or intent of this Agreement.
24. **SEVERABILITY:** If any provision of this Agreement, or application thereof to any person or circumstance, shall to any extent be invalid, then such provision shall be modified if possible, to fulfill the intent of the parties as reflected in the original provision, the remainder of this Agreement, or the application of such provision to persons or circumstances other than those as to which it is held invalid, shall not be affected thereby, and each provision of this Agreement shall be valid and enforced to the fullest extent permitted by law.
25. **ASSIGNMENT AND SUBCONTRACTS:** Neither party may assign this Agreement, in whole or in part, without the prior written consent of the other party, except for an assignment of proceeds for financing purposes. Consultant may subcontract for the Services of others without obtaining Client's consent if Consultant deems it necessary or desirable to have others perform Services.
26. **NO WAIVER:** No waiver by either party of any default by the other party in the performance of any provision of this Agreement shall operate as or be construed as a waiver of any future default, whether like or different in character.
27. **LAW TO APPLY:** The validity, interpretation, and performance of this Agreement shall be governed by and construed in accordance with the laws of the state where project is located.
28. **TIME BAR:** Notwithstanding any applicable state statute of repose or statute of limitation, the Parties agree that all legal actions by either party against the other concerning this Agreement or the work performed in relation to this Agreement, will become barred two (2) years from the time the party knew or should have known of the claim, or one year after completion of Consultant's services, whichever occurs earlier.

CONSULTANT HEREBY ADVISES CLIENT THAT ITS PERFORMANCE OF THIS AGREEMENT IS EXPRESSLY CONDITIONED ON CLIENT'S ASSENT TO THE TERMS AND CONDITIONS DETAILED HEREIN.

ENTIRE AGREEMENT - This Agreement represents the entire understanding and agreement between the parties hereto relating to the Services and supersedes any and all prior negotiations, discussions, and Agreements, whether written or oral, between the parties regarding same.

TO THE EXTENT that any additional or different Provisions conflict with the Provisions of this Agreement, the Provisions of this Agreement shall govern. No amendment or modification to this Agreement or any waiver of any provisions hereof shall be effective unless in writing, signed by both Parties.

IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed by their duly authorized representative.

CLIENT: Etowah County Commission

S&ME, Inc.

BY: *Willie F. Brown*
(Signature)

BY: *M. L. Harris*
(Signature)

Willie F. Brown, President
(Print Name / Title)

Mark Harris / Branch Manager
(Print Name / Title)

DATE: January 22, 2008

DATE: 1/28/08

PROPOSAL NUMBER: 610407178

Client's FAXED or DIGITAL signature to be treated as original signature

APPENDIX F
RESUMES OF ENVIRONMENTAL PROFESSIONALS



Project Role
Project Manager

Company
S&ME, Inc.-Chattanooga, TN

Education
B.S. Natural Resources, 1997
University of the South

Years of Experience:
Joined S&ME in 2007 with 9
years of previous experience

ROBERT A. "BOB" JACKSON
ENVIRONMENTAL PROFESSIONAL

Mr. Jackson is a Project Manager in the Environmental Services Department in S&ME's Chattanooga office. He is skilled in the following areas: client relations, Phase I Environmental Site Assessments, Phase II Environmental Site Assessments, Brownfields, and Underground Storage Tank (UST) closures.

KEY PROJECTS AND ASSIGNMENTS

EDACO Brownfield (In Process)

(Asheville, North Carolina)

Mr. Jackson brought together the proficiencies of firms in three states and authored the proposal that captured this project through a competitive bid process. Project will include assessment of subsurface contamination at a former junkyard along the French Broad River in order to redevelop property for a public park and greenway.

Dade County LUST Investigation (2007)

(Trenton, Georgia)

The County was faced with a possible re-opener on a former leaking underground storage tank closure. Mr. Jackson drafted an alternative method that resulted in negating the possibility of a re-opener and saved the client 83% from the proposal from their usual consultant.

Former ARTECH Industries Transaction (2007)

(Arden, North Carolina)

Mr. Jackson acted seamlessly as a dual consultant for a buyer and seller of an industrial property affected with heavy metal contamination in a storm sewer pipe. Managed performance of Phase I ESA, Phase II soil, groundwater and surface water sampling, and cleanup in-place of heavy metal contaminants in 160 feet of underground 24-inch corrugated metal pipe.

MasTec Divestiture of Intelligent Transportation Systems (2006)

(10 Locations across Florida)

Project and Client Manager for Phase I Environmental Site Assessments as part of a corporate divestiture program. Prepared the proposal on a Friday and completed all the site visits within four days. Project completed on time and under budget, despite being out



of state and spread over nearly the entire length of t Florida's mainland (400 miles).

Former Asheville Industries Brownfield (2006)

(Arden, North Carolina)

After winning this Brownfield project through a competitive bid process, managed project relations of Phase II investigations on a former landfill that resulted in cost savings to the client.

Former Baxter Oil Brownfield (2006)

(Hendersonville, North Carolina)

Directed first phase of assessment of subsurface petroleum contamination at a former bulk oil distributorship. Data was critical for additional investigation/mitigation of free product, vapor intrusion, and soil excavation.

Mica Village Brownfield, (2006)

(Asheville, North Carolina)

Project and client manager for Brownfield redevelopment of 1900's-era minerals mill conversion into loft condominiums. Directed completion of Phase I ESA, asbestos survey and abatement, Phase II investigation, Brownfield Agreement negotiations with the State, and scheduling of monitoring program.

Regal Petroleum SPCC Plans (2005)

(Three locations in Knoxville, TN)

Crafted Spill Prevention Controls and Countermeasures (SPCC) plans for commercial refueling stations in order to satisfy insurance carrier.

Madison County Landfill Solid Waste Plan Update (2003)

(Marshall, North Carolina)

Prepared a solid waste management plan in accordance with North Carolina General Assembly General Statute 130A-309.09A (b) for a financially-strapped mountainous county being transformed rapidly by residential development and a new Interstate.

Waffle House Restaurant Transactions (2001)

(Five locations across Arkansas)

Performed all components of Phase I Environmental Site Assessments.



Mars Hill College UST Closures (2001)

(Mars Hill, North Carolina)

Coordinated the removal of four, 35-year old, 10,000-gallon non-regulated heating oil underground storage tanks. Advised the client of intricacies in the regulations that protected them from potential liability exposures.

PUBLICATIONS

“The New Standard in Environmental Assessments” *The RMA Journal*, October 2001

CONTINUING EDUCATION

Governor’s Conference on Biofuels, 2007

Sewer Rehabilitation Strategy Workshop, 2007

New Brownfield Grantees Workshop, 2006

Basic and Intermediate Grant Writing, 2004

Brownfields Workshop for Developers and Local Governments, 2004

Environmental Health & Safety, 2003

Real Estate Fundamentals in Commercial Lending, 2002

Business Ethics, 2001

Lead-Based Paint in Renovations, 2000

Identification of Wetland Vegetation, 1998

Environmental Site Assessment for Commercial Real Estate, 1998

HAZWOPER 40-Hour Certification, 1997

RESUME

ELIZABETH M. PORTER, P.G.

POSITION Senior Geologist
S&ME, Inc.

EXPERIENCE Joined S&ME in 1993 with 4.5 years previous experience

EDUCATION B.A., Geology, State University of New York at Buffalo, 1983
M.S., Geology, University of Georgia, 1985

PROFESSIONAL REGISTRATIONS/CERTIFICATIONS

Professional Geologist, Tennessee, 1993 (#3174)
Professional Geologist, Georgia, 1997 (#001428)

FIELDS OF COMPETENCE

Project Manager and Senior Reviewer for S&ME natural resource documents; wetland delineations and stream assessments, Clean Water Act Section 404 and Section 401 permitting, mitigation and monitoring, regulatory coordination; stream restoration; NPDES and stormwater management services and permitting (including SWPPPs); Brownfield redevelopment; UST and AST assessment services, soil and groundwater assessment; RCRA/CERCLA – soil and groundwater assessment (RIs, RFAs, RFIs, etc.), and feasibility studies/corrective measure studies; Phase I and Phase II Environmental Site Assessments; environmental permitting/compliance.

KEY PROJECTS AND ASSIGNMENTS

- Project Manager for ongoing natural resource issues associated with two separate Sevier County developments involving public and private sector participation. Public sector development includes events centers and parking facilities, with golf course modifications on one of the sites, while the private sector phase includes hotels, water features, retail, residential and supporting development. Delineated wetlands, performed stream evaluations, coordinated regulatory issues, permitted wetland and stream impacts, identified mitigation opportunities, and coordinated Section 106 compliance issues, including extensive archaeological surveys.
- Project Manager for multiple wetland delineations and wetlands permitting sites in East Tennessee and Alabama. Work included jurisdictional delineation and/or preliminary assessment of wetlands, streams and ponds, report preparation and submittal; jurisdictional verification by TDEC and the United States Army Corps of Engineers (USACE); and regulatory coordination.
- Project Manager for 1.6-acre wetland mitigation project for an elementary school expansion in Northeast Tennessee. The mitigation plan combined restoration and creation of wetland areas, along with an educational program for the elementary school, to offset proposed impacts to existing wetlands. Also successfully permitted a 500-foot stream relocation for a commercial site development in Kingsport, TN.
- Project Manager for stream relocation project for retail facility in Eastern Kentucky. Work involved permitting through both state regulatory agencies and USACE for relocation of

Elizabeth M. Porter, P.G.

Geologist

Page 2

1,800 feet of stream channel. Coal refuse on the site increased the regulatory involvement and water quality issues were of primary importance.

- Project Manager for delineation, permitting, and monitoring the alteration of approximately 2,000 feet of stream channel and 1.5 acres of wetland for a commercial development in Roane County. The permit required mitigation, including relocation of 2,000 feet of stream channel and a 6.5-acre wetland designed by S&ME. The wetland and stream alteration projects have involved extensive interactions with regulators from Tennessee Department of Environment and Conservation, U.S. Army Corps of Engineers, and Tennessee Valley Authority.
- Project Manager for wetlands alteration for a proposed senior center in East Tennessee. The project involved delineation of the existing wetland, permitting the wetlands alteration, onsite mitigation through construction of a 2.4-acre wetland, and post-construction monitoring. Worked closely with regulatory personnel, the site design team and the grading contractor to design a wetland that would improve the existing habitats and provide greater diversity in the mitigation areas. The site recently completed the fifth and final successful year of mitigation monitoring.
- Project Geologist for a stream relocation involving 1,500 feet of channel impacts and 0.33 acres of wetland impacts for a commercial development. Managed the permitting phase of the project, including delineation, verification regulatory negotiations, public meetings to present the designed mitigation plan, and implementation of the plan.
- Environmental Project Manager for Brownfield redevelopment of the former North American Rayon property in Elizabethton, Tennessee. S&ME performed Phase I and Phase II site assessments for two separate tracts on the site which have been redeveloped for large retail facilities. S&ME assisted with negotiation of a Brownfield Agreement for each of the retail developments, and provided an onsite Brownfield Facilitator during construction to observe implementation of the terms and conditions of the Brownfield Agreement.
- Environmental Project Manager for multiple Brownfield sites in the Knoxville area. Generally, S&ME performs Phase I and Phase II site assessments and then incorporates the information into a Brownfield Agreement negotiated with the Tennessee Department of Environment and Conservation Division of Superfund or Division of Solid Waste Management. S&ME assists with negotiation of the Brownfield Agreement, and where warranted, provides an onsite Brownfield Facilitator during construction to observe implementation of the terms and conditions of the Brownfield Agreement.
- Project Manager for two municipal landfill Superfund sites in Hamblen County, Tennessee. Site investigation has included wetlands delineation and aquatic toxicity testing, passive soil gas survey, radiation survey, soil, groundwater, and leachate sampling, water use survey, background statistical analysis and risk assessment. Responsible for presentation of findings at public meetings along with all aspects of budget preparation, project billing and cost tracking.
- Project Manager for multiple stormwater management projects in East Tennessee, including input on preparation and review of Storm Water Pollution Prevention Plans, site sampling programs, and regulatory negotiations and reporting.

PROFESSIONAL MEMBERSHIPS/AFFILIATIONS

- Society of Wetland Scientists
- National Brownfield Association
- American Consulting Engineers Council - Tennessee Environmental Committee
- East Tennessee Industrial Council
- S&ME Natural Resources Committee Chair

CONTINUING EDUCATION


- Physical Hydrogeology, 1993, University of Wisconsin, Milwaukee
- 40 hour Hazardous Waste Operations Training, 1989, Lakeshore Technical College, and annual 8-hour refresher courses.
- ASCE Wetlands Permitting Short Course, 1998
- Water Quality Forum, Erosion & Sediment Control Seminar, April 1999, Knoxville, TN
- Wetlands Mitigation Class, Environmental Concern Inc., Sept., 1999
- Environmental Engineering 595 (Risk Assessment), University of Tennessee, Knoxville, Spring 2000
- Erosion Prevention and Sediment Control – Level I (8 Hours), February 2003
- Erosion Prevention and Sediment Control - Level II (16 Hours), April 2003
- Watershed Protection Workshop, October 2003
- Stream Restoration Workshop, May 2004
- Complete NPDES Program From Design to Implementation, StormCon, December 2005
- ASCE Continuing Education Seminar, Storm Water Pollution Prevention Plans, Sept. 2006
- ASCE Water Resources Planning & Strategies for Regional Sharing, GTRI, February 2007
- TN Mining Conference, March 2007

**PHASE I ENVIRONMENTAL SITE ASSESSMENT
LITTLE CANOE CREEK INDUSTRIAL PARK
(PROPOSED 320 ACRE ADDITION)
ETOWAH COUNTY, ALABAMA**

Prepared For:

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 **GODWYN BELL-CAWOOD**

February 20, 2012

TABLE OF CONTENTS

SECTION I	SUMMARY	
1.1	Executive Summary	1
SECTION II	INTRODUCTION	
2.1	Purpose	3
2.2	Detailed Scope of Services	3
2.3	Limitations and Exceptions	4
2.4	Special Terms and Conditions	4
2.5	User Reliance	5
SECTION III	SITE AND VICINITY DESCRIPTION	
3.1	Site Location	6
3.2	Site and Vicinity Characteristics	6
3.2.1	Surface Drainage	6
3.2.2	Regional characteristics and Geological Setting	6
3.2.3	Hydrogeology	6
3.2.4	Soils	7
3.3	Current Use of the Property	9
3.4	Description of Structures, Roads, and Other Improvements on Site	9
3.5	Current Use of Adjoining Property	9
SECTION IV	USER PROVIDED INFORMATION	
4.1	Title Records	10
4.2	Environmental Liens or Activity and Use Limitations	10
4.3	Specialized Knowledge	10
4.4	Valuation Reduction for Environmental Issues	10
4.5	Owner, Property Manager, and Occupant Information	10
4.6	Reason for Performing Phase I	10
SECTION V	RECORDS REVIEW	
5.1	Standard Record Review	11
5.2	Historical Review	15
5.3	Additional Records Review	15
SECTION VI	SITE RECONNAISSANCE	
6.1	Methodology and Limiting Conditions	16
6.2	General Site Setting	16
6.3	Exterior Observations	16
6.4	Hazardous and Unidentified Substance Containers	16
6.5	Storage Tanks	16

Phase I Environmental Site Assessment
Goodwyn, Mills & Catwood, Inc.

SECTION VII	INTERVIEWS	
7.1	Interview with the Current Owner	17
SECTION VIII	FINDINGS	
8.1	Findings	18
SECTION IX	CONCLUSION	
9.1	Conclusion	19

APPENDICES

- A. Figures**
 - 1. Site Location Map
 - 2. USGS Quadrangle Map, Steele, Alabama 1947 (photorevised 1972)
 - 3. 1998 Aerial Photograph of Subject Site
 - 4. 2005 Aerial Photograph of Subject Site
 - 5. 2006 Aerial Photograph of Subject Site
 - 6. 2010 Aerial Photograph of Subject Site
 - 7. (USDA) NRCS Etowah County Soil Survey Map

- B. Photographs**

- C. Environmental First Search Records Review**

- D. Qualifications of Environmental Professionals Participating in Phase I Environmental Site Assessment**

- E. References**

**SECTION I
SUMMARY**

SECTION I
SUMMARY

1.1 Executive Summary

Goodwyn, Mills & Cawood, Inc. (GMC) has completed a Phase I Environmental Site Assessment (ESA) for the Etowah County Commission on a 320-Acre parcel located near Steele, Alabama. The parcel is located within the Middle Coosa Watershed (HUC Code 03150106) with the center coordinates for the site being Latitude: 33° 58' 12" North, Longitude: 86° 09' 21" West (WGS84/NAD83). It is further described as being located in Sections 19 and 30 of Township-12-South, Range-5-East in Etowah County, Alabama (Refer to Figure 2). This assessment includes a records review of state and federally listed facilities, maps, and visual observations of the site. A Phase I ESA does not include any testing or sampling of materials (i.e., soil, water, air, building materials, etc.).

GMC conducted an Environmental First Search records review of the target site. The review of Federal and State environmental records identified no facilities on the subject site or within the listed radii on any of the environmental databases. Details regarding the records review are located in Section 5.1 of this report and the First Search review in Appendix C.

GMC reviewed records from the Environmental Protection Agency (EPA) EnviroMapper website to determine environmental interests associated with the subject site and surrounding properties within an approximate 0.25-mile radius from the site. It did not appear that any listed sites were within the 0.25-mile radius of the subject site.

GMC conducted a walking and vehicular reconnaissance within an approximate 1-mile radius of the subject and noted the subject site is located in a mostly undeveloped area with scattered residences. It is located to the south of County Road 7 and to the north of Interstate 59. The subject parcel is comprised of mostly undeveloped agricultural land. Little Lake is located on the east side of the property. Several small ponds and a network of streams and drainage ditches are dispersed throughout the site. Several empty and old 55-gallon drums were noted throughout the property on the date of the site reconnaissance. Piles of miscellaneous household debris and tires were also noted on site. No structures were assessed for the subject site during the site visits. Two mounds were noted along the railroad on the north side of the railroad tracks. An additional mound was noted on the southern portion of the property. It appeared that these mounds contained soil and inert material, such as rock and concrete.

GMC conducted a historical research of the property and noted that a majority of the subject site is within the former Camp Sibert property boundary. Camp Sibert was a former Army base used from 1942 to 1945 to train units and individuals in basic military training, the use of chemical weapons, decontamination procedures, and smoke operations. The subject site is located within "Site 19 - Conventional Mortar Impacts Areas" of the former camp. Based on previous studies, this particular site is not a suspect location for the disposal of chemical warfare material or hazardous materials within the former camp boundary.

Phase I Environmental Site Assessment
Goodwyn, Mills & Cawood, Inc.

GMC conducted an interview with Annette Little, the current owner, in regards to the history and use of the property. Ms. Little stated that the property has been owned by her family for approximately 60 years, when her father purchased the property from the U.S. Army. The Army owned the property and was utilizing it as part of the former Camp Sibert. To her knowledge, the property has always been farmland since it was purchased by her father. She has no knowledge of any tanks on site or any hazardous spills or contamination related to the site.

This report was completed in general accordance with the requirements established by the American Standards for Testing and Materials (ASTM) E1527-05 Standard. Based on the findings of this report, this assessment has revealed no potential Recognized Environmental Condition (REC) exists at the property. However, GMC has identified de minimus conditions on the subject property. The de minimus conditions include several empty and old 55-gallon drums, piles of miscellaneous household debris, and tires located throughout the site. No spills or stains were noted in relation to these conditions, however, GMC recommends all items are removed from the site and have proper disposal.

In addition, this property is located within boundary of the former Camp Sibert facility. Although this area of the camp is not known to contain hazardous materials, GMC recommends that the U.S. Army Corp of Engineers be contacted in the event of the discovery of any mortars or other potentially hazardous materials during site development.

SECTION II
INTRODUCTION

SECTION II
INTRODUCTION

2.1 Purpose

Goodwyn, Mills & Cawood, Inc. (GMC) was retained by the Etowah County Commission to perform a Phase I Environmental Site Assessment (ESA) on a 320-Acre parcel located near Steele, Etowah County, Alabama. This Phase I ESA meets the current ASTM Standard E1527-05 and is being conducted to satisfy the All Appropriate Inquiries (AAI) Rule that became effective in November of 2006. GMC conducted a records review and visual site inspection to identify potential Recognized Environmental Conditions at the subject property.

2.2 Detailed Scope of Services

GMC conducted the Phase I ESA in general accordance with the American Society for Testing and Materials (ASTM) codes E1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process¹.

The scope of work performed as part of the Phase I ESA is as follows:

- A historical review of the use and improvements made to the subject site.
- A review of applicable building, zoning, planning, sewer, water, fire and environmental department records that would have information on or have an interest in the property and neighboring sites.
- An investigation of the subject property and neighboring properties with regard to the Environmental Protection Agency's (EPA) National Priorities List (NPL) or Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) list and similar state lists.
- An inspection of the site and all improvements with a visual inspection for hazardous materials and regulated non-hazardous materials.
- A review of available information to determine whether present owners or tenants have stored, created or discharged hazardous materials or waste, and, if applicable, a review of whether appropriate procedures and safeguards have been observed.
- A written report summarizing the findings with conclusions as to the potential environmental degradation believed to be associated with the property.

¹ Copyright, ASTM International, West Conshohocken, PA. All rights reserved.

2.3 Limitations and Exceptions

Goodwyn, Mills & Cawood, Inc. (GMC) has performed this investigation for the exclusive use of the client, their lending institution and their legal counsel specifically for the subject site. GMC prohibits republication or reuse of any report without GMC's prior written consent.

The conclusions contained in this report are based upon the conditions at the site during the time of the investigation. As stated in the ASTM E1527-05 standard, an environmental site assessment meeting or exceeding the Practice ASTM E1527-05 and completed less than 180 days previously is presumed to be valid. An environmental site assessment meeting or exceeding either practice ASTM E1527-05 or 1528-00 completed more than 180 days previously may be used to the extent outlined in the standard.

Environmental problems at this site not included in the scope of work, if any, are not the responsibility of GMC. Examples of such problems are unreported releases, unreported sites, and sites not listed by the Alabama Department of Environmental Management (ADEM) or by the Environmental Protection Agency (EPA).

GMC has made no attempt to independently verify the information provided by others, and cannot be held responsible for false or erroneous information that was provided to GMC. Any documents or information that was obtained by GMC in the preparation of this report is assumed to be true and accurate.

The only warranty made by GMC in connection with the services provided is that we have used the degree of skill and care ordinarily exercised by similarly situated professionals in our locality. No other warranty, expressed or implied, is made or intended.

GMC will not be required to sign any documents, no matter by whom requested, that would result in GMC having to certify, guarantee or warrant the existence of conditions whose existence GMC cannot ascertain. The client also agrees not to make resolution of any dispute with GMC or payment of any amount due to GMC in any way contingent upon GMC signing any such certification.

This report and the conclusions included herewith are relevant only to the environmental condition of the site. GMC has made no effort to evaluate or assess health or safety issues.

2.4 Special Terms and Conditions

The following are a list of issues that GMC specifically did not address in this ESA; however, the list is not exhaustive:

1. Lead-Based Paint
2. Lead in Drinking Water
3. Wetlands
4. Regulatory Compliance
5. Cultural and Historic Resources

Phase I Environmental Site Assessment
Goodwyn, Mills & Cawood, Inc.

6. Industrial Hygiene
7. Health and Safety
8. Ecological Resources
9. Endangered and Threatened Species
10. Indoor Air Quality
11. High Voltage Power lines
12. Radon Gas
13. Asbestos
14. "Waters of the U.S."

2.5 User Reliance

The owner(s) of the document may rely upon this document. The owner's attorneys and other parties that are considered "interested parties" may rely upon this document by permission of the owner as outlined in the ASTM E1527-05 Standard. An environmental professional is not required to independently verify the information provided but may rely on information provided unless it is obvious that certain information is not correct based on other information or that he or she has actual knowledge that certain information is incorrect.

SECTION III
SITE DESCRIPTION

SECTION III SITE AND VICINITY DESCRIPTION

3.1 Site Location

The subject site is located near Steele, Alabama. It is within the Middle Coosa Watershed (HUC Code 03150106) with the center coordinates for the site being Latitude: 33° 58' 12" North, Longitude: 86° 09' 21" West (WGS84/NAD83). It is further described as being located in Sections 19 and 30 of Township-12-South, Range-5-East in Etowah County, Alabama (Refer to Figure 2).

3.2 Site and Vicinity Characteristics

3.2.1 Surface Drainage

According to the 1947 (photo revised 1972) Steele, Alabama U.S. Geological Survey Quadrangle Map, the elevation of the subject parcel is generally flat and lies between 560 and 610 feet above mean sea level. It appears that drainage from the property flows in a southeasterly direction towards Rook Creek (See Figure 2). The property lies within the Middle Coosa Watershed (HUC Code 03150106).

3.2.2 Regional Characteristics and Geological Setting

The subject site lies within the Valley and Ridge Physiographic Province and consists of a series of northeast-trending linear ridges and valleys underlain by alternating beds of hard and soft Paleozoic sedimentary rocks, which are highly faulted and folded and range in age from Cambrian to Pennsylvanian. The ridges are composed of cherty limestone, dolomite, and sandstones. The valleys are developed in more soluble limestone, dolomite, and shale. Resistant sandstone and chert underlie the ridges, and softer shale and limestone underlie the valleys. The Valley and Ridge Physiographic Province is included in the Southern Appalachian Ridges and Valleys Major Land Resource Area (MLRA). Soils in the valleys of the Southern Appalachian Ridges and Valleys were formed mainly in residuum of weathered limestone and are predominantly red, iron, and clay-rich types with silt loam surface textures. The ridges consist of cherty limestone that produce a gravelly loam and gravelly clay subsoil and a gravelly silt loam surface layer.

3.2.3 Hydrogeology

The site lies in Valley and Ridge Physiographic Province. Aquifers in this province consist of permeable geologic formations within folded and faulted Paleozoic sedimentary rocks. The rocks range in age from early to late Paleozoic. Most of the Valley and Ridge aquifers consist of limestone or dolomite. The carbonate rocks are productive aquifers primarily because of the solution openings in the easily dissolved limestone and dolomite. These openings, which originate as bedding planes and joints in the carbonate rocks, are enlarged by percolating slightly acidic ground water, and become linked as a series of conduits that rapidly transmit large volumes of ground water through the

carbonate rocks. The easily eroded carbonate rocks form wide valley floors, which are favorable areas for recharge. Other aquifers consist of sandstone formations but yield less water than do the carbonate rocks. Much of the water from the sandstone is obtained from fractures. Regolith, which acts as a porous media aquifer above the carbonate-rock aquifers, contains chert rubble of Cenozoic age that stores and transmits water slowly to the underlying fractured-rock aquifer.

3.2.4 Soils

According to the Natural Resource Conservation Service (NRCS) Etowah County Web Soil Survey Map, the following soils are found on the subject site (see Figure 7).

- **Conasauga loam, 1 to 5 percent slopes (12)**

These deep and moderately deep, well drained to moderately well drained, gently sloping soils (2 to 6 percent slopes) are on uplands. They have loamy surface layers and sticky, plastic, clayey subsoils. The root zone is deep, but plant roots may be restricted because of the clayey subsoil. These soils are difficult to till because of the high clay content in the upper subsoil. These soils are moderately well suited to row crops and small grains and well suited to hay crops and pasture. The erosion hazard is moderate. A combination of several conservation practices is needed on cultivated fields to control erosion and provide for proper water disposal. Cropping systems that include sod and close growing crops are usually needed in rotation with cultivated crops.

- **Conasauga loam, 5 to 15 percent slopes (13)**

These deep and moderately deep, well drained to somewhat poorly drained, strongly sloping and moderately steep soils (10 to 25 percent slopes except Conasauga ranges from 6 to 15 percent slopes) are on uplands. They have loamy surface layers and sticky and plastic clayey subsoils. The root zone can be penetrated by plant roots, but it is somewhat restricted by the clayey subsoil. These soils are not suited to row crops, small grains, and most hay crops. They are moderately well suited to sericea and poorly suited to other hay and pasture crops.

- **Conasauga-Rock outcrop complex, 2 to 6 percent slopes (15)**

These deep and moderately deep, well drained to somewhat poorly drained, strongly sloping and moderately steep soils (10 to 25 percent slopes except Conasauga ranges from 6 to 15 percent slopes) are on uplands. They have loamy surface layers and sticky and plastic clayey subsoils. The root zone can be penetrated by plant roots, but it is somewhat restricted by the clayey subsoil. These soils are not suited to row crops, small grains, and most hay crops. They are moderately well suited to sericea and poorly suited to other hay and pasture crops.

- **Conasauga-Rock outcrop complex, 6 to 25 percent slopes (16)**

These moderately deep, moderately well drained, moderately steep and steep soils (more than 15 percent slopes) are on uplands. They have loamy surface soils and sticky and plastic clayey subsoils. The root zone can be penetrated by plant roots, but is somewhat restricted by the clayey subsoil. These

soils are not suited to row crops, small grains, hay crops, and pasture. The erosion hazard is very severe.

- **Firestone loam, 2 to 6 percent slopes (23)**

These deep and moderately deep, well drained to moderately well drained, gently sloping soils (2 to 6 percent slopes) are on uplands. They have loamy surface layers and sticky, plastic, clayey subsoils. The root zone is deep, but plant roots may be restricted because of the clayey subsoil. These soils are difficult to till because of the high clay content in the upper subsoil. These soils are moderately well suited to row crops and small grains and well suited to hay crops and pasture. The erosion hazard is moderate. A combination of several conservation practices is needed on cultivated fields to control erosion and provide for proper water disposal. Cropping systems that include sod and close growing crops are usually needed in rotation with cultivated crops.

- **Firestone silt loam, 6 to 15 percent slopes (24)**

These deep and moderately deep, well drained to somewhat poorly drained, sloping soils (6 to 10 percent slopes) are on uplands. They have loamy surface layers and clayey subsoils that are sticky and plastic. The root zone is deep but plant roots may be restricted by the clayey subsoil. These soils are difficult to till because of the high clay content in the upper subsoil. These soils are poorly suited to row crops and moderately well suited to small grains. They are well suited to hay crops and pasture. The erosion hazard is severe. A good system of conservation practices is essential when these soils are used for cultivated row crops. Cropping systems that include sod and close growing crops must be used in combination if cultivated crops are grown.

- **Gaylesville silt loam (26)**

These deep, poorly drained to somewhat poorly drained, nearly level soils (0 to 2 percent slopes) are on low stream terraces. They have loamy surface layers and clayey subsoils. The root zone is often restricted by a seasonally high water table. These soils are poorly suited to row crops, small grains and most hay crops and pasture because of wetness. These soils are moderately well suited to fescue and white clover in the northern part of the state. Soil wetness can be partially overcome by extensive surface drainage systems. The erosion hazard is slight.

The Gaylesville silt loam is listed as being hydric in the Hydric Soils of the United States (1995), Hydric Soils of Alabama (1995) and the Etowah County hydric soils list (2005). A hydric soil is one that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions in the upper horizons, which may cause it to be classified as a wetland and subject to the jurisdiction of the U.S. Army Corps of Engineers.

3.3 Current Use of the Property

Representatives of GMC visited the subject site on January 17 and February 7, 2012. The property is currently pasture land.

3.4 Description of Structures, Roads, and Other Improvements on Site

On the dates of the site visit, a walking and vehicular reconnaissance was conducted at and within an approximate 1-mile radius of the subject site. The subject site is located to south of County Road 9 and to the north of Interstate 59. A dirt road is located on the northeast portion of the site. A railroad runs through the northwest of the property. It appears that a utility easement is located on the southern portion of the property. The easement runs from the southeast corner of the property in a northeasterly direction (see Figure 2). This easement was not noted during site reconnaissance. No structures were noted on the date of the site visit.

3.5 Current Use of Adjoining Properties

Adjacent properties appear to be mostly forested in nature, with some residences located to the north east of the property (see table below).

North	Residential/Forested, Undeveloped Land
South	Forested, Undeveloped Land
East	Forested, Undeveloped Land
West	Forested, Undeveloped Land

**SECTION IV
USER PROVIDED
INFORMATION**

SECTION IV
USER PROVIDED INFORMATION

4.1 Title Records

No title records or information regarding the title of the subject site has been reviewed by GMC for this report.

4.2 Environmental Liens or Activity and Use Limitations

GMC has no knowledge of any environmental liens against the subject property.

4.3 Specialized Knowledge

GMC has no specialized knowledge of the subject site.

4.4 Valuation Reduction for Environmental Issues

GMC has identified no environmental issues that would result in a reduction of value of the subject site.

4.5 Owner, Property Manager, and Occupant Information

The property is currently owned by Annette Little. Ms. Little's family has owned the property for approximately 60 years. The property is currently farmland.

4.6 Reason for Performing Phase I

A Phase I ESA is being performed at the request of the Etowah County Commission in order to determine the environmental condition of the property as part of their "due diligence" prior to purchasing the property.

SECTION V
RECORDS REVIEW

SECTION V
RECORDS REVIEW

5.1 Standard Records Review

GMC conducted an Environmental First Search records review of the target site. Enclosed please find the ASTM standard checklist with search distances relevant to each environmental database.

Below is a list of environmental databases reviewed in the Environmental First Search Records Review. These databases are from the U.S. Environmental Protection Agency (EPA) and the Alabama Department of Environmental Management (ADEM). They are reviewed to determine if records exist of previous contamination episodes having occurred within the following approximate minimum search distance from the subject site:

<u>List</u>	<u>Search distance</u> <u>Miles</u>
Federal NPL site list	1.0
Federal NPL delisted site	0.5
Federal CERCLIS list	0.5
Federal NFRAP List	0.5
Federal RCRA COR list	1.0
Federal RCRA TSD list	0.5
Federal RCRA GEN list	0.25
Federal RCRA NLR list	0.25
Federal Brownfield	0.50
Federal ERNS List	0.25
Federal Tribal Lands	1.0
State/Tribal Sites	1.0
State/Tribal SWL	0.5
State/Tribal LUST list	0.5
State/Tribal UST/AST list	0.25
State/Tribal BC	0.25
State/Tribal IC	0.25
State/Tribal VCP	0.5
State/Tribal Brownfields	0.5
Federal Institutional/Engineering Controls (IC/EC)	0.25

Phase I Environmental Site Assessment
Goodwyn, Mills & Cawood, Inc.

The records below were reviewed for pertinent information and they revealed the following:

1. **U.S. EPA National Priorities List (NPL – October 2011)**
NPL - a list of sites designated as needing long-term remedial cleanup. The purpose of the list is to inform the public of the most serious hazardous waste sites in the nation.

None currently listed within the minimum 1-mile search distance.
2. **U.S. EPA National Priorities Delisted Sites (NPL Delisted – October 2011)**
NPL Delisted - a list of sites formerly designated as NPL sites where remediation was deemed successful and the sites were deleted from the NPL status.

None currently listed within the minimum 0.5-mile search distance.
3. **U.S. EPA Comprehensive Environmental Response Compensation and Liability Information System List (CERCLIS – September 2011)**
CERCLIS - a database maintained by U.S. EPA and the states which lists sites where releases have either been addressed or need to be addressed for Superfund investigation of onsite contamination.

None currently listed within the minimum 0.5-mile search distance.
4. **U.S. EPA Comprehensive Environmental Response Compensation and Liability Information System List (CERCLIS NFRAP – September 2011)**
CERCLIS - NFRAP - a database maintained by U.S. EPA and the states which lists sites where releases have either been addressed or need to be addressed for Superfund investigation of onsite contamination but are no longer involved with remedial activities.

None currently listed within the minimum 0.5-mile search distance.
5. **Resource Conservation and Recovery Act Corrective Action (RCRA COR – September 2011)**
RCRA COR - The EPA's list of all registered hazardous waste generators that are subject to corrective actions imposed by the EPA for non-compliance with RCRA laws and guidelines.

None currently listed within the minimum 1-mile search distance.
6. **Resource Conservation and Recovery Act Treatment Storage and Disposal Sites (RCRA TSD – September 2011)**
RCRA TSD - list of all registered hazardous waste generators that are classified as TSD facilities. These firms are licensed to respond and deal with emergency situations involving hazardous and toxic materials.

None currently listed within the approximate minimum 0.5-mile search distance.

- 7. Resource Conservation and Recovery Act (RCRA) Notifiers List of Generators (RCRA GEN - September 2011)**
RCRA - The EPA's list of all registered hazardous waste generators regardless of size or quantity of waste being generated.

None currently listed within the approximate minimum 0.25-mile search distance.
- 8. Resource Conservation and Recovery Act (RCRA) Information Systems Sites No Longer Reporting (RCRA NLR - September 2011)**
RCRA - The EPA's list of all of all facilities not currently classified by the EPA but are still included RCRAInfo database.

None currently listed within the minimum 0.25-mile search distance.
- 9. Federal Brownfield (December 2011)**
Federal Brownfield - Brownfield is defined as real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant".

None currently listed within the minimum 0.50-mile search distance.
- 10. Federal Emergency Response Notification System List (ERNS - January 2012)**
ERNS - EOA's list of reported CERCLA hazardous substance releases or spills in quantities greater than the reportable quantity, as maintained at the National Response Center.

None currently listed within the minimum .25-mile search distance.
- 11. Federal Tribal Lands (December 2005)**
Federal Tribal Lands - Federal database of Native American properties that qualify as tribal lands. These properties are not federal public lands or part of the public domain, and are not subject to federal public land laws.

None currently listed within the minimum 1.0-mile search distance.
- 12. State/Tribal Sites (STATE) (January 2011)**
STATE - The STATE list is a listing of known potential hazardous waste sites maintained by the State of Alabama.

None currently listed within the minimum 1-mile search distance.

Phase I Environmental Site Assessment
Goodwyn, Mills & Carwood, Inc.

13. **State Permitted Solid Waste Landfills (SWL - June 2007)**
Construction/Demolition Waste - waste building materials, packing, and rubble resulting from construction, remodeling, repair, or demolition operations on pavement, houses, commercial buildings, and other structures. Such waste includes, but is not limited to, masonry materials, sheet rock, roofing waste, insulation (not including asbestos) rebar, scrap metal, paving materials, and wood products. Uncontaminated concrete, soil, brick, rock, and similar materials are excluded from the definition.
- Industrial Landfill - non-hazardous waste excluding sanitary Waste*
- None currently listed within the approximate minimum 0.5-mile search distance.
14. **Leaking Underground Storage Tank List (LUST - November 2011)**
LUST - leaking tanks that store "related substances" including hazardous chemical products regulated under CERCLA and petroleum products, and that are more than 10% below the surface of the ground.
- None currently listed within the minimum 0.5-mile search distance.
15. **Registered Underground Storage Tanks List (UST - July 2011)**
UST - one or more tanks, including underground connective piping, that store regulated substances, and are more than 10% under the ground. Regulated substances include hazardous chemical product regulated under CERCLA and petroleum products.
- None currently listed within the minimum .25-mile search distance.
16. **State/Tribal Engineering Controls**
State EC - Engineering Controls are a form of physical modification to a site to restrict exposure to certain contaminants such as a "vapor barrier" below a building or a clean soil cap on a contaminated soil area.
- None currently listed within the minimum 0.25-mile search distance.
17. **State/Tribal Institutional Controls**
State IC - Institutional controls are a form of "deed restriction" placed on a property by a governing authority to reduce exposure to contaminants. A common deed restriction might be to prohibit residential or school use of the property.
- None currently listed within the minimum 0.25-mile search distance.
18. **State/Tribal Voluntary Cleanup Program (VCP- April 2011)**
State VCP - List of sites currently enrolled in a voluntary cleanup program. The VCP provides a mechanism for the implementation of a cleanup program that encourages applicants to voluntarily assess, remediate, and reuse rural and urban areas of actual or perceived contamination.

None currently listed within the minimum 0.5-mile search distance.

19. State/Tribal Brownfields (April 2011)

State Brownfield – Brownfields are defined as real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

None currently listed within the minimum 1-mile search distance.

20. Federal Institutional/Engineering Controls (IC/EC - November 2011)

Federal IC/EC – Institutional controls are a form of “deed restriction” placed on a property by a governing authority to reduce exposure to contaminants. A common deed restriction might be to prohibit residential or school use of the property. Engineering Controls are a form of physical modification to a site to restrict exposure to certain contaminants such as a “vapor barrier” below a building or a clean soil cap on a contaminated soil area.

None currently listed within the minimum 0.25-mile search distance.

5.2 Historical Review

A majority of the subject site is within the former Camp Sibert property boundary. Camp Sibert was a former Army base used from 1942 to 1945 to train units and individuals in basic military training, the use of chemical weapons, decontamination procedures, and smoke operations. The subject site is located within “Site 19 – Conventional Mortar Impacts Areas” of the former camp. Based on previous studies, this particular site is not a suspect location for the disposal of chemical warfare material within the former camp boundary.

Aerial photographs taken in 1998, 2005, 2006, and 2010 were reviewed for this report. There were no changes observed on the subject site or surrounding areas on these aerials. The site has been used as farmland for over 60+ years.

5.3 Additional Records Review

GMC reviewed records from the Environmental Protection Agency (EPA) EnviroMapper website to determine environmental interests associated with the subject site and surrounding properties within an approximate 0.25-mile radius from the site. It did not appear that any listed sites were within the 0.25-mile radius of the subject site.

SECTION VI
SITE RECONNAISSANCE

SECTION VI
SITE RECONNAISSANCE

6.1 Methodology and Limiting Conditions

On January 17 and February 7, 2012, representatives of GMC conducted a vehicular and walking reconnaissance within an approximate 1-mile radius around the subject site.

6.2 General Site Setting

The subject site is located in a mostly undeveloped area with scattered residences. It is located to the south of County Road 7 and to the north of Interstate 59.

6.3 Exterior Observations

The subject parcel is comprised of mostly farmland. Littles Lake is located on the east side of the property. Several small ponds and a network of streams and drainage ditches are dispersed throughout the site. No structures were assessed for the subject site during the site visits. GMC noted several mounded areas in various locations on the site. Two mounds were noted along the railroad on the north side of the railroad tracks. An additional mound was noted on the southern portion of the property. It appeared that these mounds contained soil and inert material, such as rock and concrete.

6.4 Hazardous Substance Containers and Unidentified Substance Containers

Several empty and old 55-gallon drums were noted throughout the property on the date of the site reconnaissance. Piles of miscellaneous household debris and tires were also noted on site.

6.5 Storage Tanks

No evidence of underground or aboveground storage tanks were noted at the time of the site visit.

SECTION VII
INTERVIEWS

SECTION VII
INTERVIEWS

7.1 Interview with Current Owner

GMC conducted an interview with Annette Little, the current owner, in regards to the history and use of the property. Ms. Little stated that the property has been owned by her family for approximately 60 years, when her father purchased the property from the U.S. Army. The Army owned the property and was utilizing it as part of the former Camp Sibert. To her knowledge, the property has always been farmland since it was purchased by her father. She has no knowledge of any tanks on site or any hazardous spills or contamination related to the site.

**SECTION VIII
FINDINGS**

SECTION VIII FINDINGS

8.1 Findings

A summary of the findings associated with this property include the following:

- GMC conducted an Environmental First Search records review of the target site. The review of Federal and State environmental records identified no facilities on the subject site or within the listed mile radii on any of the environmental databases. Details regarding the records review are located in Section 5.1 of this report and the First Search review in Appendix C.
- GMC reviewed records from the Environmental Protection Agency (EPA) EnviroMapper website to determine environmental interests associated with the subject site and surrounding properties within an approximate 0.25-mile radius from the site. It did not appear that any listed sites were within the 0.25-mile radius of the subject site.
- During site reconnaissance, GMC noted the subject site is located in a mostly undeveloped area with scattered residences. It is located to the south of County Road 7 and to the north of Interstate 59. The subject parcel is comprised of mostly farmland. Little Lake is located on the east side of the property. Several small ponds and a network of streams and drainage ditches are dispersed throughout the site. Several empty and old 55-gallon drums were noted throughout the property on the date of the site reconnaissance. Piles of miscellaneous household debris and tires were also noted on site. No structures were assessed for the subject site during the site visits. Two mounds were noted along the railroad on the north side of the railroad tracks. An additional mound was noted on the southern portion of the property. It appeared that these mounds contained soil and inert material, such as rock and concrete.
- GMC conducted a historical research of the property and noted that a majority of the subject site is within the former Camp Sibert property boundary. Camp Sibert was a former Army base used from 1942 to 1945 to train units and individuals in basic military training, the use of chemical weapons, decontamination procedures, and smoke operations. The subject site is located within "Site 19 - Conventional Mortar Impacts Areas" of the former camp. Based on previous studies, this particular site is not a suspect location for the disposal of chemical warfare material within the former camp boundary.
- GMC conducted an interview with Annette Little, the current owner, in regards to the history and use of the property. Ms. Little stated that the property has been owned by her family for approximately 60 years, when her father purchased the property from the U.S. Army. The Army owned the property and was utilizing it as part of the former Camp Sibert. To her knowledge, the property has always been farmland since it was purchased by her father. She has no knowledge of any tanks on site or any hazardous spills or contamination related to the site.

**SECTION IX
CONCLUSION**

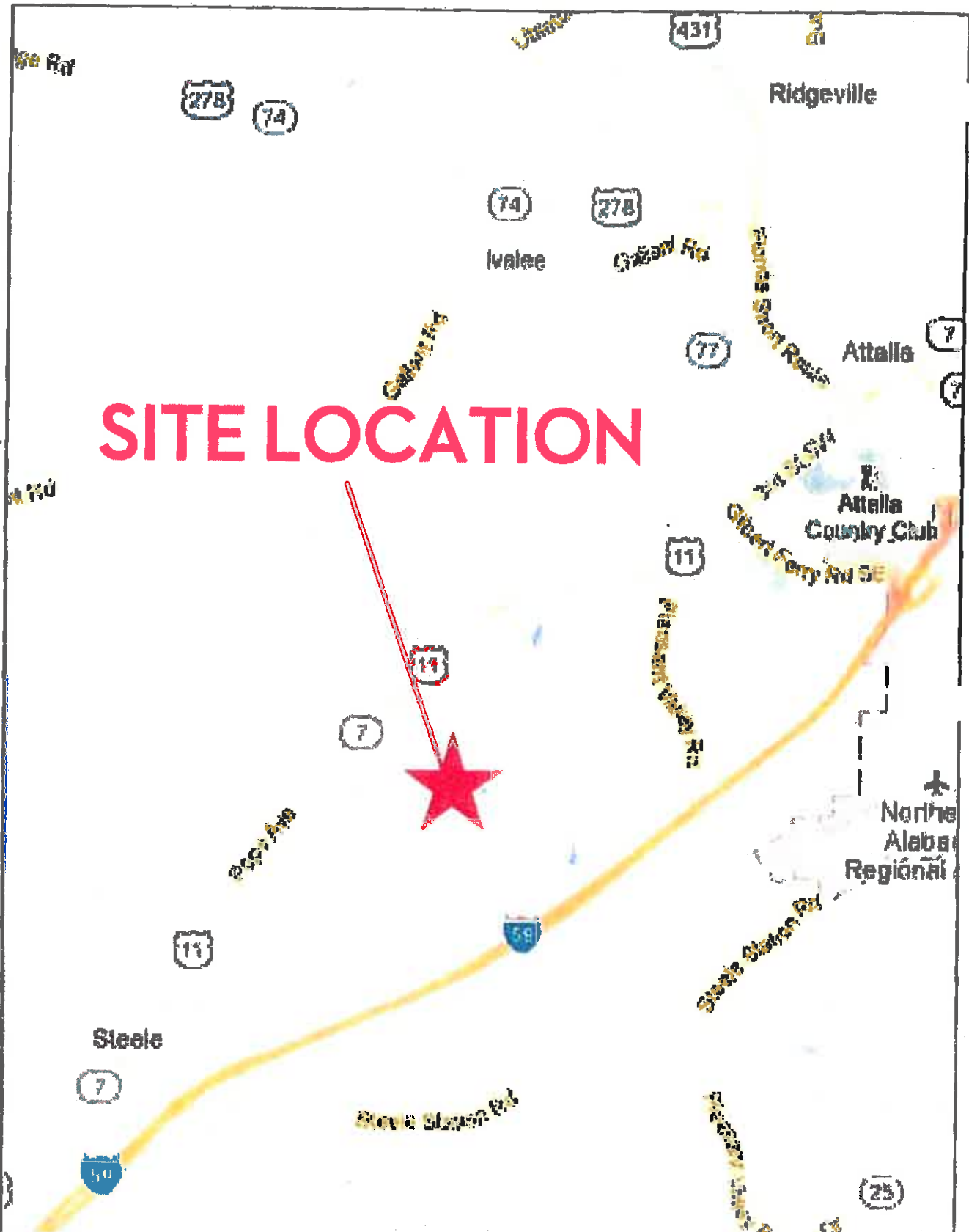
SECTION IX
CONCLUSION

9.1 Conclusion

In conclusion, GMC has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-05 of the 320-Acre property located near Steele, Etowah County, Alabama. Any exceptions to, or deletions from, this practice are described in Section 2.9 of this report. In GMC's opinion regarding the environmental conditions associated with the property, this assessment has revealed no Recognized Environmental Condition (REC) exists at the property. However, GMC has identified de minimus conditions on the subject property. The de minimus conditions include several empty and old 55-gallon drums, piles of miscellaneous household debris, and tires located throughout the site. No spills or stains were noted in relation to these conditions, however, GMC recommends all items are removed from the site and have proper disposal.

In addition, this property is located within boundary of the former Camp Sibert facility. Although this area of the camp is not known to contain hazardous materials, GMC recommends that the U.S. Army Corp of Engineers be contacted in the event of the discovery of any mortars or other potentially hazardous materials during site development.

APPENDIX A
FIGURES



SITE LOCATION

REF. SHEET:
DESCRIPTION: SITE LOCATION

LITTLE CANOE CREEK INDUSTRIAL PARK - ADDITIONAL 320 ACRES
ETOWAH COUNTY, ALABAMA

FIGURE 1

SITE LOCATION MAP
GMC # EHM-125002
DATE: 01/22/2012
DRAWN BY: SAB

GOODWYN | MILLS | CAWOOD

2701st Ave South, Suite 100 | Birmingham, AL 35233
Tel 205.879.4462 | GMCNETWORK.COM



REF. SHEET:
 DESCRIPTION: STEELE, ALABAMA 1842 (PHOTOREVIEWED 1979)
**LITTLE CANOE CREEK INDUSTRIAL
 PARK - ADDITIONAL 320 ACRES**
 ETOWAH COUNTY, ALABAMA

FIGURE 2
 UNGS QUADRANGLE MAP
 GMC # EBH-0125002
 DATE: 01/25/2002
 DRAWN BY: SAB

GOODWYN | MILLS | CAWOOD
 2701 1st Ave South, Suite 100 | Birmingham, AL 35233
 Tel 205.877.4422 | GCMNETWORK.COM



NORTH

SCALE: 1" = 1,500'

REF. SHEET:
DESCRIPTION: AERIAL PHOTOGRAPH

**LITTLE CANOE CREEK INDUSTRIAL
PARK - ADDITIONAL 320 ACRES**
ETOWAH COUNTY, ALABAMA

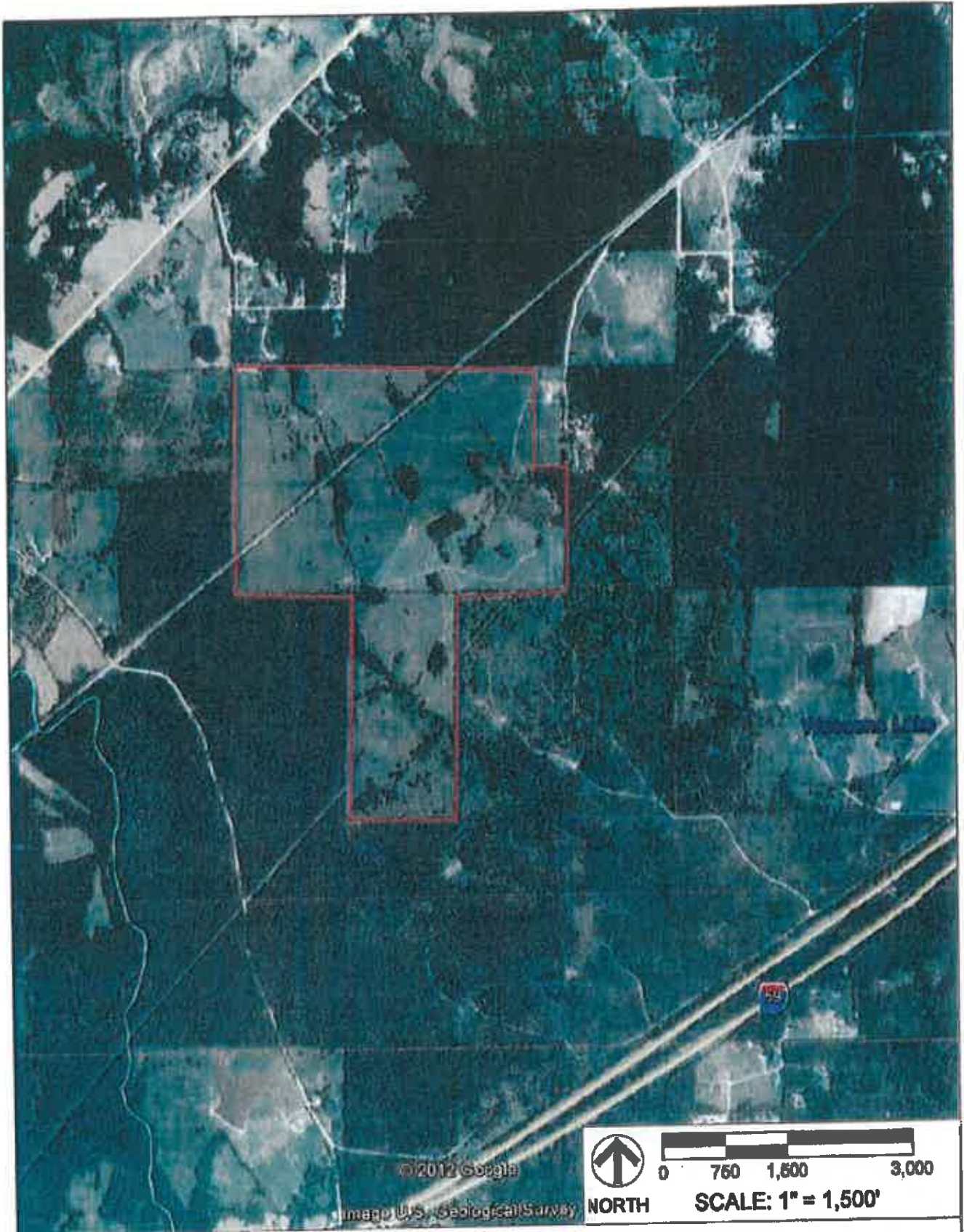
FIGURE 3

1998 AERIAL PHOTOGRAPH
GMC # ERH-H125002
DATE: 07/25/2012
DRAWN BY: EAB



GOODWYN | MILLS | CAWOOD

2701 1st Ave South, Suite 100 | Birmingham, AL 35233
Tel 205.879-4462 | GMCNETWORK.COM



REF. SHEET:
DESCRIPTION: AERIAL PHOTOGRAPH

**LITTLE CANOE CREEK INDUSTRIAL
PARK - ADDITIONAL 320 ACRES**
ETOWAH COUNTY, ALABAMA

FIGURE 4

2008 AERIAL PHOTOGRAPH
GMC # EBHM2008
DATE: 01/22/2012
DRAWN BY: SAB



GOODWYN | MILLS | CAWOOD

2708 1st Ave South, Suite 100 | Birmingham, AL 35215
Tel 205.879.4444 | GNCNETWORK.COM



REF. SHEET:
 DESCRIPTION: AERIAL PHOTOGRAPH

**LITTLE CANOE CREEK INDUSTRIAL
 PARK - ADDITIONAL 320 ACRES**
 ETOWAH COUNTY, ALABAMA

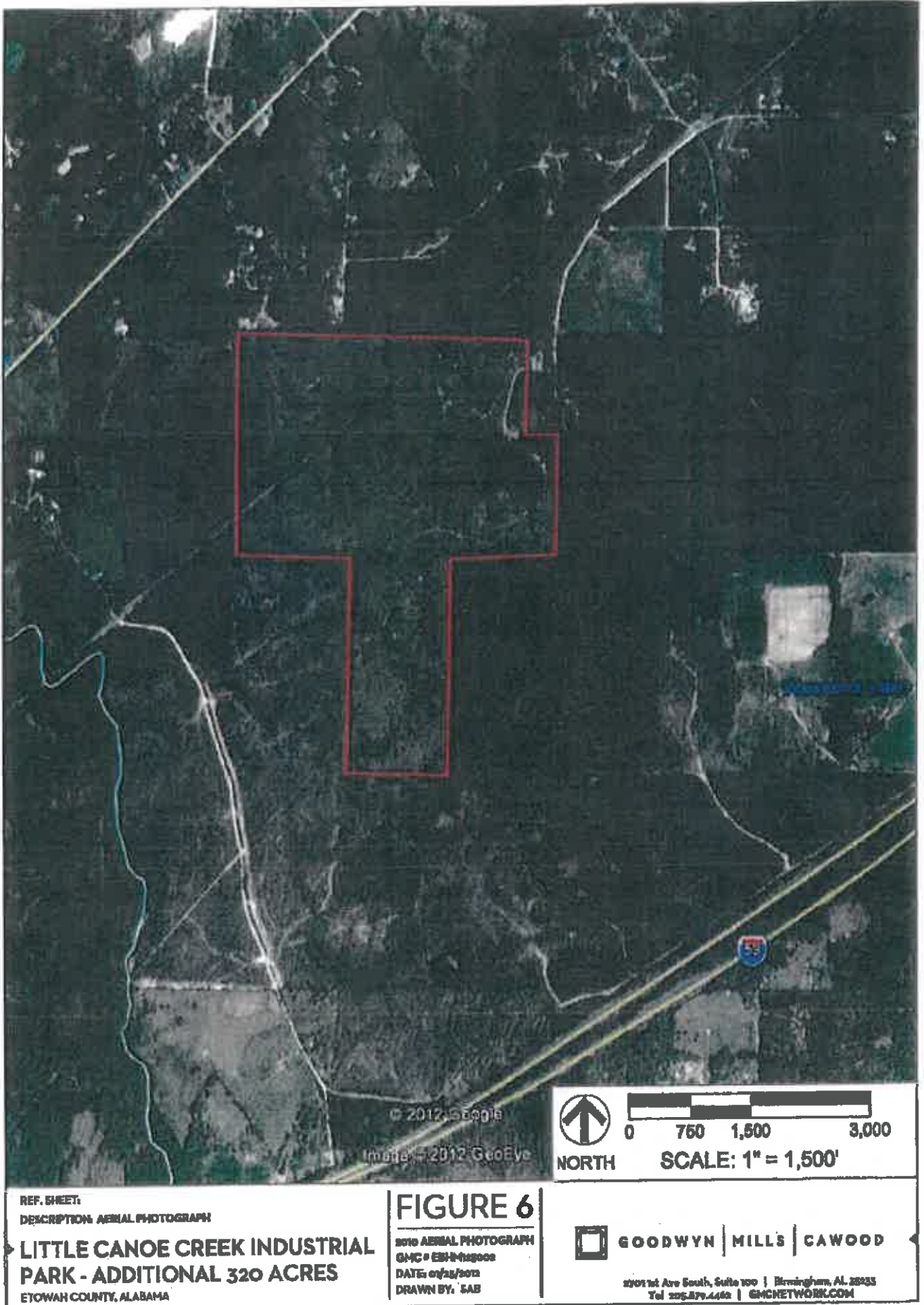
FIGURE 5

2004 AERIAL PHOTOGRAPH
 GMC # EBH-025002
 DATE: 01/25/2008
 DRAWN BY: SAB



GOODWYN | MILLS | CAWOOD

3701 1st Ave South, Suite 100 | Birmingham, AL 35233
 Tel 205.879.4468 | GWCNETWORK.COM



AS198 Phase I Environmental Study 2008-05-14

Soil Map—Etowah County, Alabama



MAP INFORMATION

Map Scale: 1:9,480 if printed on A size (8.5" x 11") sheet.
 The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service
 Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>
 Coordinate System: UTM Zone 18N NAD83












































This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Etowah County, Alabama
 Survey Area Date: Version 4, Nov 18, 2009

Date(s) aerial images were photographed: 8/21/2006

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

MAP LEGEND

	Area of Interest (AOI)		Very Stony Spot
	Area of Interest (AOI)		Wet Spot
	Soils		Other
	Soil Map Units		Special Line Features
	Special Point Features		Gully
	Blowout		Short Steep Slope
	Borrow Pit		Other
	Clay Spot		Political Features
	Closed Depression		Choke
	Gravel Pit		Water Features
	Gravelly Spot		Streams and Canals
	Landfill		Transportation
	Lava Flow		Rails
	Marsh or swamp		Interstate Highways
	Mine or Quarry		US Routes
	Miscellaneous Water		Major Roads
	Perennial Water		Local Roads
	Rock Outcrop		
	Saline Spot		
	Sandy Spot		
	Severely Eroded Spot		
	Stratified		
	Slide or Slip		
	Soil Spot		
	Spot Area		
	Stony Spot		

Map Unit Legend

Etowah County, Alabama (AL066)			
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
12	Conasauga loam, 1 to 5 percent slopes	182.1	61.4%
13	Conasauga loam, 5 to 15 percent slopes	13.2	4.2%
15	Conasauga-Rock outcrop complex, 2 to 6 percent slopes	5.1	1.6%
16	Conasauga-Rock outcrop complex, 6 to 25 percent slopes	54.0	17.3%
23	Firestone loam, 2 to 6 percent slopes	5.4	1.7%
24	Firestone silt loam, 6 to 15 percent slopes	3.5	1.1%
25	Gaylesville silt loam	31.8	10.2%
W	Water	7.8	2.4%
Totals for Area of Interest		312.8	100.0%

APPENDIX B
PHOTOGRAPHS

P-1



View of the property at the east entrance

P-2



General view of the property

P-3



View of the large pond

P-4



View of the large pond

P-5



General view of the property

P-6



General view of the property

P-7



View of a stream channel

P-8



View of a wetland area

P-9



View of the railroad running through the property

P-10



View of tires located on the property

P-11



View of miscellaneous debris

P-12



View of an old 55-gallon drum

**APPENDIX C
ENVIRONMENTAL FIRST
SEARCH RECORDS REVIEW**

FirstSearch Technology Corporation

Environmental FirstSearch™ Report

Target Property: LITTLE CANOE CREEK ADDITION LA 320 ACRES

STEELE AL 35897

Job Number: EBHM125002

PREPARED FOR:

**Goodwyn Mills & Cawood
2701 1st Ave South, Suite 100
Birmingham, AL 35233**

01-16-12



Tel: (407) 265-8900

Fax: (407) 265-8904

Environmental FirstSearch is a registered trademark of FirstSearch Technology Corporation. All rights reserved.

Environmental FirstSearch Search Summary Report

Target Site:

STEELE AL 35897

FirstSearch Summary

Database	Sel	Updated	Radius	Site	1/8	1/4	1/2	1/2>	ZIP	TOTALS
NPL	Y	10-25-11	1.00	0	0	0	0	0	0	0
NPL Delisted	Y	10-25-11	0.50	0	0	0	0	-	0	0
CERCLIS	Y	09-30-11	0.50	0	0	0	0	-	0	0
NFRAP	Y	09-30-11	0.50	0	0	0	0	-	0	0
RCRA COR ACT	Y	09-13-11	1.00	0	0	0	0	0	0	0
RCRA TSD	Y	09-13-11	0.50	0	0	0	0	-	0	0
RCRA GEN	Y	09-13-11	0.25	0	0	0	-	-	0	0
RCRA NLR	Y	09-13-11	0.25	0	0	0	-	-	0	0
Federal Brownfield	Y	12-01-11	0.50	0	0	0	0	-	0	0
ERNS	Y	01-11-12	0.15	0	0	0	-	-	0	0
Tribal Lands	Y	12-01-05	1.00	0	0	0	0	0	0	0
State/Tribal Sites	Y	01-01-11	1.00	0	0	0	0	0	0	0
State Spills 90	Y	NA	0.25	0	0	0	-	-	0	0
State/Tribal SWL	Y	06-29-11	0.50	0	0	0	0	-	0	0
State/Tribal LUST	Y	11-01-11	0.50	0	0	0	0	-	0	0
State/Tribal UST/AST	Y	07-29-11	0.25	0	0	0	-	-	0	0
State/Tribal EC	Y	NA	0.50	0	0	0	0	-	0	0
State/Tribal IC	Y	NA	0.25	0	0	0	-	-	0	0
State/Tribal VCP	Y	04-12-11	0.50	0	0	0	0	-	0	0
State/Tribal Brownfields	Y	04-12-11	0.50	0	0	0	0	-	0	0
State Other	Y	01-01-07	0.25	0	0	0	-	-	0	0
Federal IC/BC	Y	11-01-11	0.50	0	0	0	0	-	0	0
- TOTALS -				0	0	0	0	0	0	0

Notice of Disclaimer

Due to the limitations, constraints, inaccuracies and incompleteness of government information and computer mapping data currently available to FirstSearch Technology Corp., certain conventions have been utilized in preparing the locations of all federal, state and local agency sites residing in FirstSearch Technology Corp.'s databases. All RPA NPL and state landfill sites are depicted by a rectangle approximating their location and size. The boundaries of the rectangles represent the eastern and western most longitudes; the northern and southern most latitudes. As such, the mapped areas may exceed the actual areas and do not represent the actual boundaries of these properties. All other sites are depicted by a point representing their approximate address location and make no attempt to represent the actual areas of the associated property. Actual boundaries and locations of individual properties can be found in the files residing at the agency responsible for such information.

Waiver of Liability

Although FirstSearch Technology Corp. uses its best efforts to research the actual location of each site, FirstSearch Technology Corp. does not and can not warrant the accuracy of these sites with regard to exact location and size. All authorized users of FirstSearch Technology Corp.'s services proceeding are signifying an understanding of FirstSearch Technology Corp.'s searching and mapping conventions, and agree to waive any and all liability claims associated with search and map results showing incomplete and/or inaccurate site locations.

**Environmental FirstSearch
Site Information Report**

Request Date: 01-16-12
Requestor Name: Melissa Mehaffey
Standard: AAI

Search Type: AREA
 0.51 sq mile(s)
Job Number: EBHM125002
Filtered Report

Target Site:
 STEELE AL 35897

Demographics

Sites: 0	Non-Geocoded: 0	Population: NA
Radon: NA		

Site Location

	<u>Degrees (Decimal)</u>	<u>Degrees (Min/Sec)</u>	<u>UTMs</u>
Longitude:	-86.15621	-86:9:22	Easting: 577953.971
Latitude:	33.968257	33:58:6	Northing: 3758762.77
Elevation:	N/A		Zone: 16

Comment

Comment: PHASE I ESA

Additional Requests/Services

Adjacent ZIP Codes: 0 Mile(s)	Services:																																		
<table border="1"> <thead> <tr> <th>ZIP Code</th> <th>City Name</th> <th>ST</th> <th>Dist/Dir</th> <th>Sei</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	ZIP Code	City Name	ST	Dist/Dir	Sei						<table border="1"> <thead> <tr> <th></th> <th>Requested?</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Fire Insurance Maps</td> <td>No</td> <td></td> </tr> <tr> <td>Aerial Photographs</td> <td>No</td> <td></td> </tr> <tr> <td>Historical Topos</td> <td>No</td> <td></td> </tr> <tr> <td>City Directories</td> <td>No</td> <td></td> </tr> <tr> <td>Title Search/Env Liens</td> <td>No</td> <td></td> </tr> <tr> <td>Municipal Reports</td> <td>No</td> <td></td> </tr> <tr> <td>Online Topos</td> <td>No</td> <td></td> </tr> </tbody> </table>		Requested?	Date	Fire Insurance Maps	No		Aerial Photographs	No		Historical Topos	No		City Directories	No		Title Search/Env Liens	No		Municipal Reports	No		Online Topos	No	
ZIP Code	City Name	ST	Dist/Dir	Sei																															
	Requested?	Date																																	
Fire Insurance Maps	No																																		
Aerial Photographs	No																																		
Historical Topos	No																																		
City Directories	No																																		
Title Search/Env Liens	No																																		
Municipal Reports	No																																		
Online Topos	No																																		

**Environmental FirstSearch
Sites Summary Report**

Target Property:

STEELE AL 35897

JOB:
PHASE I ESA

EBHM125002

TOTAL: 0

GEOCODED: 0

NON GEOCODED: 0

SELECTED: 0

<u>Map ID</u>	<u>DB Type</u>	<u>Site Name/ID/Status</u>	<u>Address</u>	<u>Dist/Dir</u>	<u>ElevDiff</u>	<u>Page No.</u>
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Environmental FirstSearch Descriptions

NPL: EPA NATIONAL PRIORITY LIST - The National Priorities List is a list of the worst hazardous waste sites that have been identified by Superfund. Sites are only put on the list after they have been scored using the Hazard Ranking System (HRS), and have been subjected to public comment. Any site on the NPL is eligible for cleanup using Superfund Trust money.

A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the Environmental Protection Agency (EPA) as a candidate for cleanup because it poses a risk to human health and/or the environment.

FINAL - Currently on the Final NPL

PROPOSED - Proposed for NPL

NPL DELISTED: EPA NATIONAL PRIORITY LIST Subset - Database of delisted NPL sites. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

DELISTED - Deleted from the Final NPL

CERCLIS: EPA COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY INFORMATION SYSTEM (CERCLIS)- CERCLIS is a database of potential and confirmed hazardous waste sites at which the EPA Superfund program has some involvement. It contains sites that are either proposed to be or are on the National Priorities List (NPL) as well as sites that are in the screening and assessment phase for possible inclusion on the NPL.

PART OF NPL- Site is part of NPL site

DELETED - Deleted from the Final NPL

FINAL - Currently on the Final NPL

NOT PROPOSED - Not on the NPL

NOT VALID - Not Valid Site or Incident

PROPOSED - Proposed for NPL

REMOVED - Removed from Proposed NPL

SCAN PLAN - Pre-proposal Site

WITHDRAWN - Withdrawn

NFRAP: EPA COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY INFORMATION SYSTEM ARCHIVED SITES - database of Archive designated CERCLA sites that, to the best of EPA's knowledge, assessment has been completed and has determined no further steps will be taken to list this site on the National Priorities List (NPL). This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

NFRAP - No Further Remedial Action Plan

P - Site is part of NPL site

D - Deleted from the Final NPL

F - Currently on the Final NPL

N - Not on the NPL

O - Not Valid Site or Incident

P - Proposed for NPL

R - Removed from Proposed NPL

S - Pre-proposal Site

W - Withdrawn

RCRA COR ACT: EPA RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM SITES - Database of hazardous waste information contained in the Resource Conservation and Recovery Act Information (RCRAInfo), a national program management and inventory system about hazardous waste handlers. In general, all generators, transporters, treaters, storers, and disposers of hazardous waste are required to provide information about their activities to state environmental agencies. These agencies, in turn pass on the information to regional and national EPA offices. This regulation is governed by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984. RCRAInfo facilities that have reported violations and subject to corrective actions.

RCRA TSD: EPA RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM TREATMENT, STORAGE, and DISPOSAL FACILITIES. - Database of hazardous waste information contained in the Resource Conservation and Recovery Act Information (RCRAInfo), a national program management and inventory system about hazardous waste handlers. In general, all generators, transporters, treaters, storers, and disposers of hazardous waste are required to provide information about their activities to state environmental agencies. These agencies, in turn pass on the information to regional and national EPA offices. This regulation is governed by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984.

Facilities that treat, store, dispose, or incinerate hazardous waste.

RCRA GEN: EPA/MA DEP/CT DEP RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM GENERATORS - Database of hazardous waste information contained in the Resource Conservation and Recovery Act Information (RCRAInfo), a national program management and inventory system about hazardous waste handlers. In general, all generators, transporters, treaters, storers, and disposers of hazardous waste are required to provide information about their activities to state environmental agencies. These agencies, in turn pass on the information to regional and national EPA offices. This regulation is governed by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984.

Facilities that generate or transport hazardous waste or meet other RCRA requirements.

LGN - Large Quantity Generators

SGN - Small Quantity Generators

VGN - Conditionally Exempt Generator.

Included are RAATS (RCRA Administrative Action Tracking System) and CMEL (Compliance Monitoring & Enforcement List) facilities.

CONNECTICUT HAZARDOUS WASTE MANIFEST - Database of all shipments of hazardous waste within, into or from Connecticut. The data includes date of shipment, transporter and TSD info, and material shipped and quantity. This data is appended to the details of existing generator records.

MASSACHUSETTES HAZARDOUS WASTE GENERATOR - database of generators that are regulated under the MA DEP.

VQN-MA = generates less than 220 pounds or 27 gallons per month of hazardous waste or waste oil.

SQN-MA = generates 220 to 2,200 pounds or 27 to 270 gallons per month of waste oil.

LQG-MA = generates greater than 2,200 lbs of hazardous waste or waste oil per month.

RCRA NLR: EPA RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM SITES - Database of hazardous waste information contained in the Resource Conservation and Recovery Act Information (RCRAInfo), a national program management and inventory system about hazardous waste handlers. In general, all generators, transporters, treaters, storers, and disposers of hazardous waste are required to provide information about their activities to state environmental agencies. These agencies, in turn pass on the information to regional and national EPA offices. This regulation is governed by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984.

Facilities not currently classified by the EPA but are still included in the RCRAInfo database. Reasons for non classification:

Failure to report in a timely matter.

No longer in business.

No longer in business at the listed address.

No longer generating hazardous waste materials in quantities which require reporting.

ERNS: EPA/NRC EMERGENCY RESPONSE NOTIFICATION SYSTEM (ERNS) - Database of incidents reported to the National Response Center. These incidents include chemical spills, accidents involving chemicals (such as fires or explosions), oil spills, transportation accidents that involve oil or chemicals, releases of radioactive materials, sightings of oil sheens on bodies of water, terrorist incidents involving chemicals, incidents where illegally dumped chemicals have been found, and drills intended to prepare responders to handle these kinds of incidents. Data since January 2001 has been received from the National Response System database as the EPA no longer maintains this data.

Tribal Lands: DOUBLA INDIAN LANDS OF THE UNITED STATES - Database of areas with boundaries established by treaty, statute, and (or) executive or court order, recognized by the Federal Government as territory in which American Indian tribes have primary governmental authority. The Indian Lands of the United States map layer shows areas of 640 acres or more, administered by the Bureau of Indian Affairs. Included are

Federally-administered lands within a reservation which may or may not be considered part of the reservation.
BUREAU OF INDIAN AFFAIRS CONTACT - Regional contact information for the Bureau of Indian Affairs offices.

State/Tribal Sites: ADEM ALABAMA HAZARDOUS WASTE CLEANUP FUND ANNUAL REPORT (AHSCF) - database of sites addressed utilizing AHSCF funds either are not qualified for, or are unlikely to receive cleanup funding under the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, commonly referred to as Superfund.

State/Tribal SWL: ADEM LANDFILLS LIST - database of landfills including Construction/Demolition and Industrial Landfills, Industrial Landfills and Municipal Waste Landfills.

State/Tribal LUST: ADEM UST RELEASE INCIDENT LIST - database of petroleum storage systems that have reported the possible release of contaminants.

State/Tribal UST/AST: ADEM/EPA UNDERGROUND STORAGE TANK LIST - database of underground storage tanks, the data includes pipe construction, tank construction, leak detection and substance stored.

TRIBAL LAND UNDERGROUND STORAGE TANKS - database of underground storage tanks that are reported to be on Native American lands.

State/Tribal Brownfields: ADEM/EPA LAND DIVISION BROWNFIELDS 128(A) PROGRAM SHEET - database of Brownfield activities performed by ADEM. The data includes institutional control information.
Brownfield Management System (BMS) - database designed to assist EPA in collecting, tracking, and updating information, as well as reporting on the major activities and accomplishments of the various Brownfield Grant Programs.

RADON: NRTS NATIONAL RADON DATABASE - EPA radon data from 1990-1991 national radon project collected for a variety of zip codes across the United States.

State Other: US DOJ NATIONAL CLANDESTINE LABORATORY REGISTER - Database of addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the U.S. Department of Justice ("the Department"), and the Department has not verified the entry and does not guarantee its accuracy. All sites that are included in this data set will have an id that starts with NCLR.

Environmental FirstSearch Database Sources

NPL: EPA Environmental Protection Agency

Updated quarterly

NPL DELISTED: EPA Environmental Protection Agency

Updated quarterly

CERCLIS: EPA Environmental Protection Agency

Updated quarterly

NFRAP: EPA Environmental Protection Agency.

Updated quarterly

RCRA COR ACT: EPA Environmental Protection Agency.

Updated quarterly

RCRA TSD: EPA Environmental Protection Agency.

Updated quarterly

RCRA GEN: EPA/MA DEP/CT DEP Environmental Protection Agency, Massachusetts Department of Environmental Protection, Connecticut Department of Environmental Protection

Updated quarterly

RCRA NLR: EPA Environmental Protection Agency

Updated quarterly

ERNS: EPA/NRC Environmental Protection Agency

Updated annually

Tribal Lands: DOI/BIA United States Department of the Interior

Updated annually

State/Tribal Sites: ADEM Alabama Department of Environmental Management

Updated quarterly

Environmental FirstSearch
Street Name Report for Streets within .25 Mile(s) of Target Property

Target Property:

STEELE AL 35897

JOB:
PHASE I ESA

EBHM125002

<u>Street Name</u>	<u>Dist/Dir</u>	<u>Street Name</u>	<u>Dist/Dir</u>
Little Rd	0.00 --		

State/Tribal SWL: ADEM Alabama Department of Environmental Management

Updated quarterly

State/Tribal LUST: ADEM Alabama Department of Environmental Management

Updated quarterly

State/Tribal UST/AST: ADEM/EPA Alabama Department of Environmental Management

Updated quarterly

State/Tribal Brownfields: ADEM/EPA Alabama Department of Environmental Management

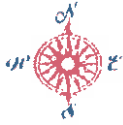
Updated quarterly

RADON: NTIS Environmental Protection Agency, National Technical Information Services

Updated periodically

State Other: US DOJ U.S. Department of Justice

Updated when available

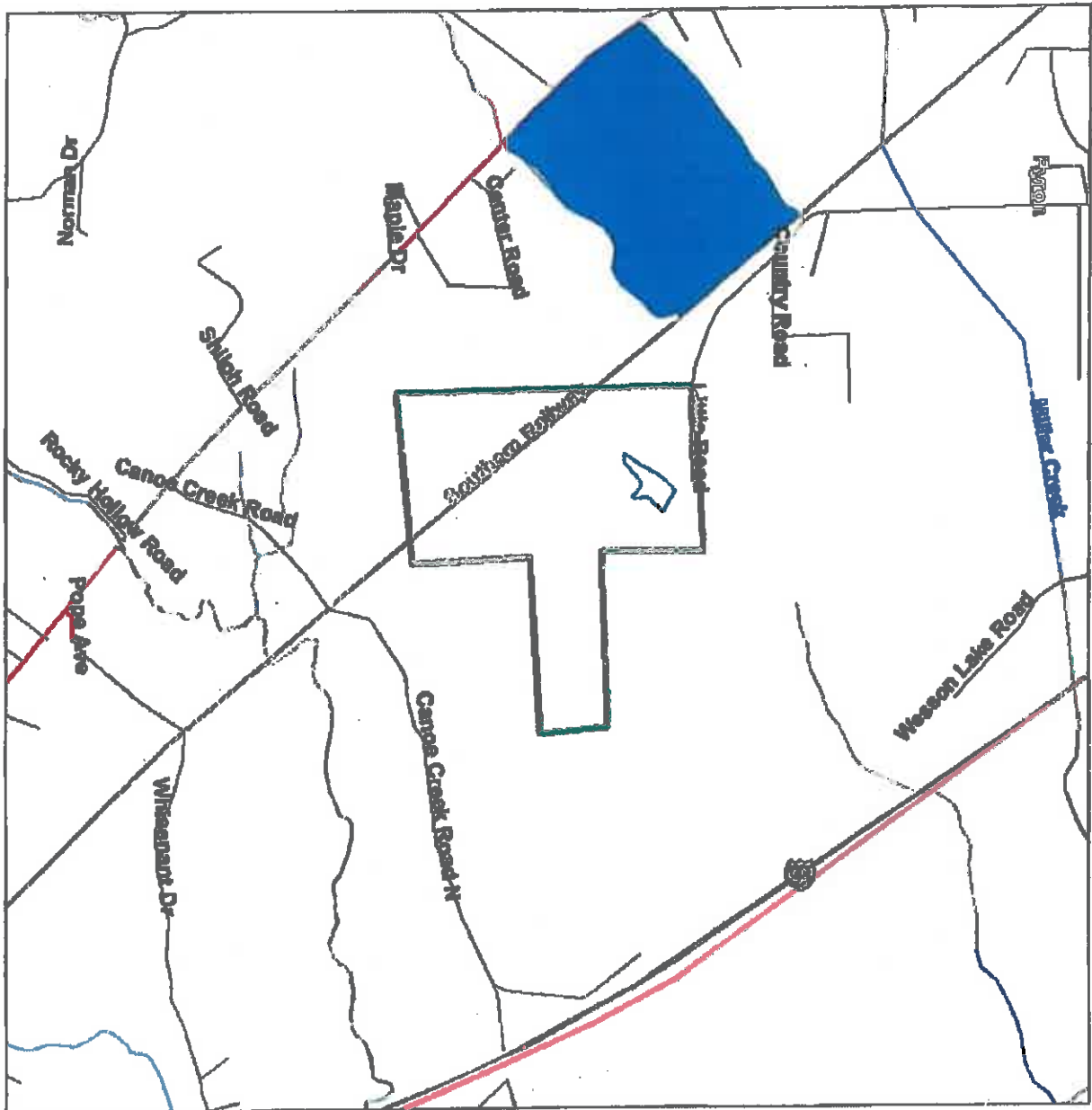


Environmental FirstSearch

1 Mile Radius from Area
ASTM Map: NPL, RCRACOR, STATE Sites

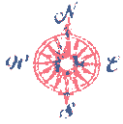


, STEELE AL. 35897



Source: 2005 U.S. Census TIGER Files

- Area Polygon
- Identified Site, Multiple Sites, Receptor
- NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
- Tribal Land
- Railroads

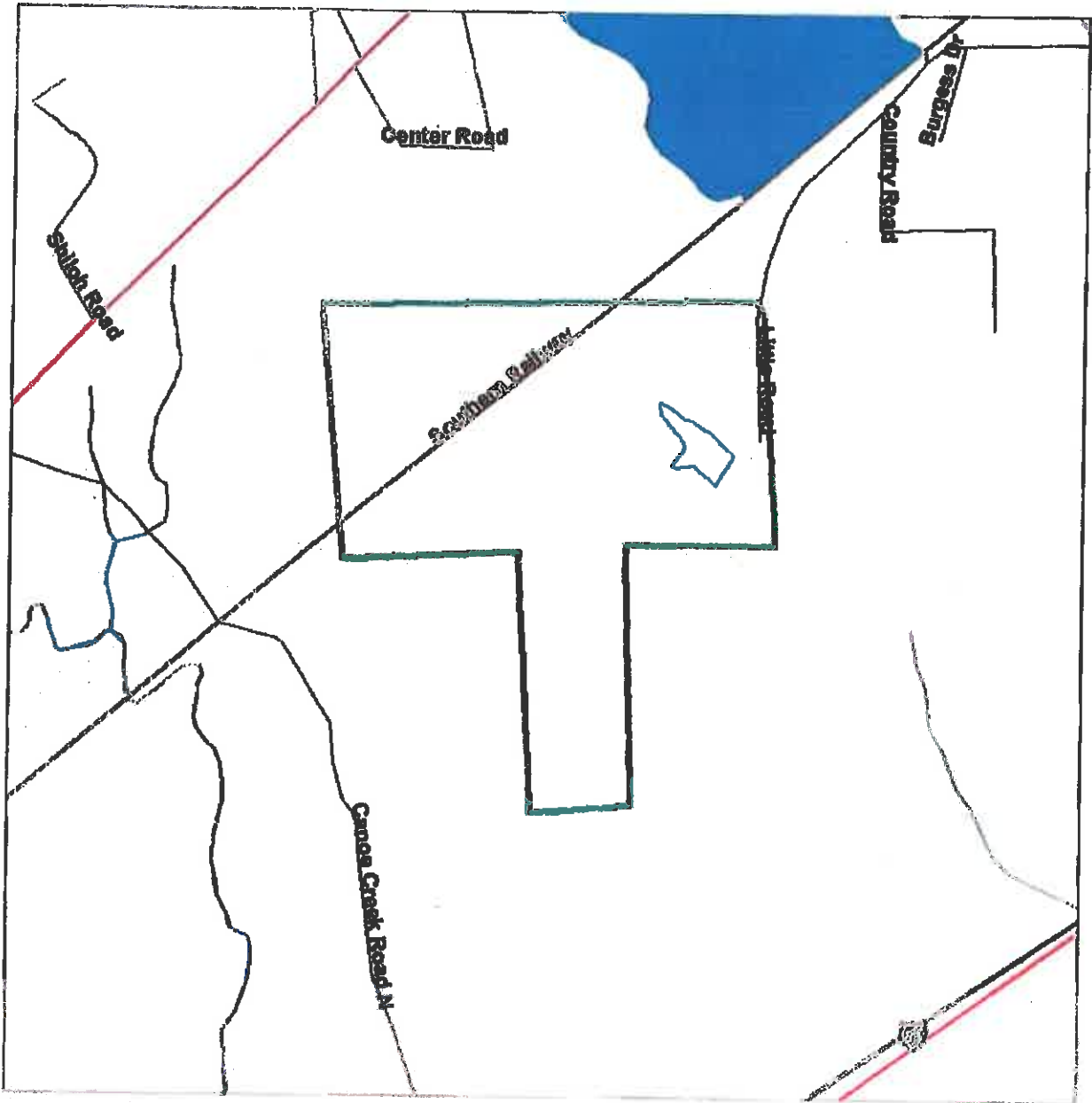


Environmental FirstSearch

.5 Mile Radius from Area
ASTM Map: CERCLIS, RCRATSD, LUST, SWL



, STEELE AL 36897

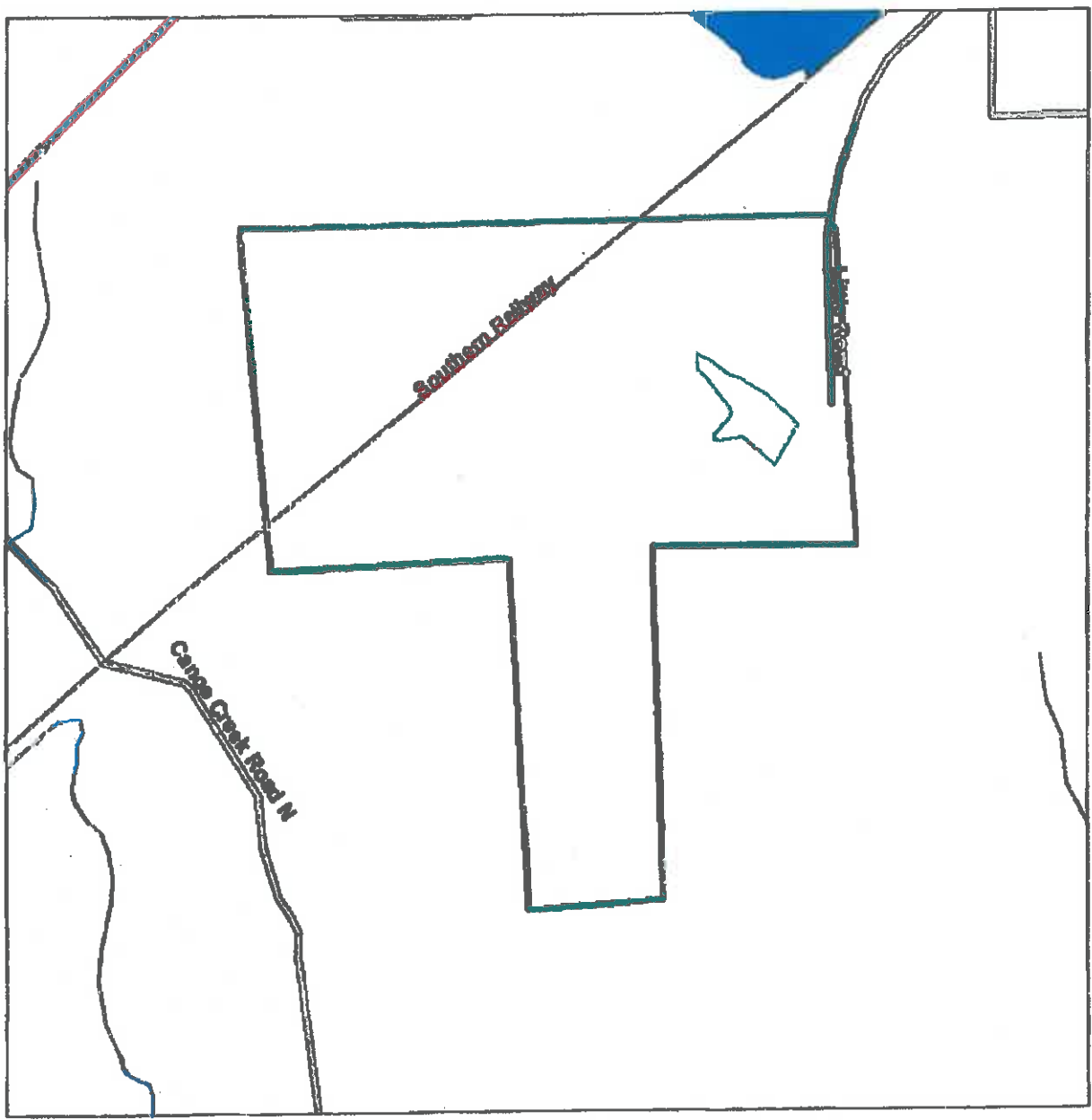


Source: 2005 U.S. Census TIGER Files

- Area Polygon
- Identified Site, Multiple Sites, Receptor
- NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
- Tribal land
- Railroads



Environmental FirstSearch
 .25 Mile Radius from Area
 ASTM Map: RCRA GEN, ERNS, UST, FED IC/EC, METH LABS
 , STEELE AL. 36897



Source: 2005 U.S. Census TIGER Files

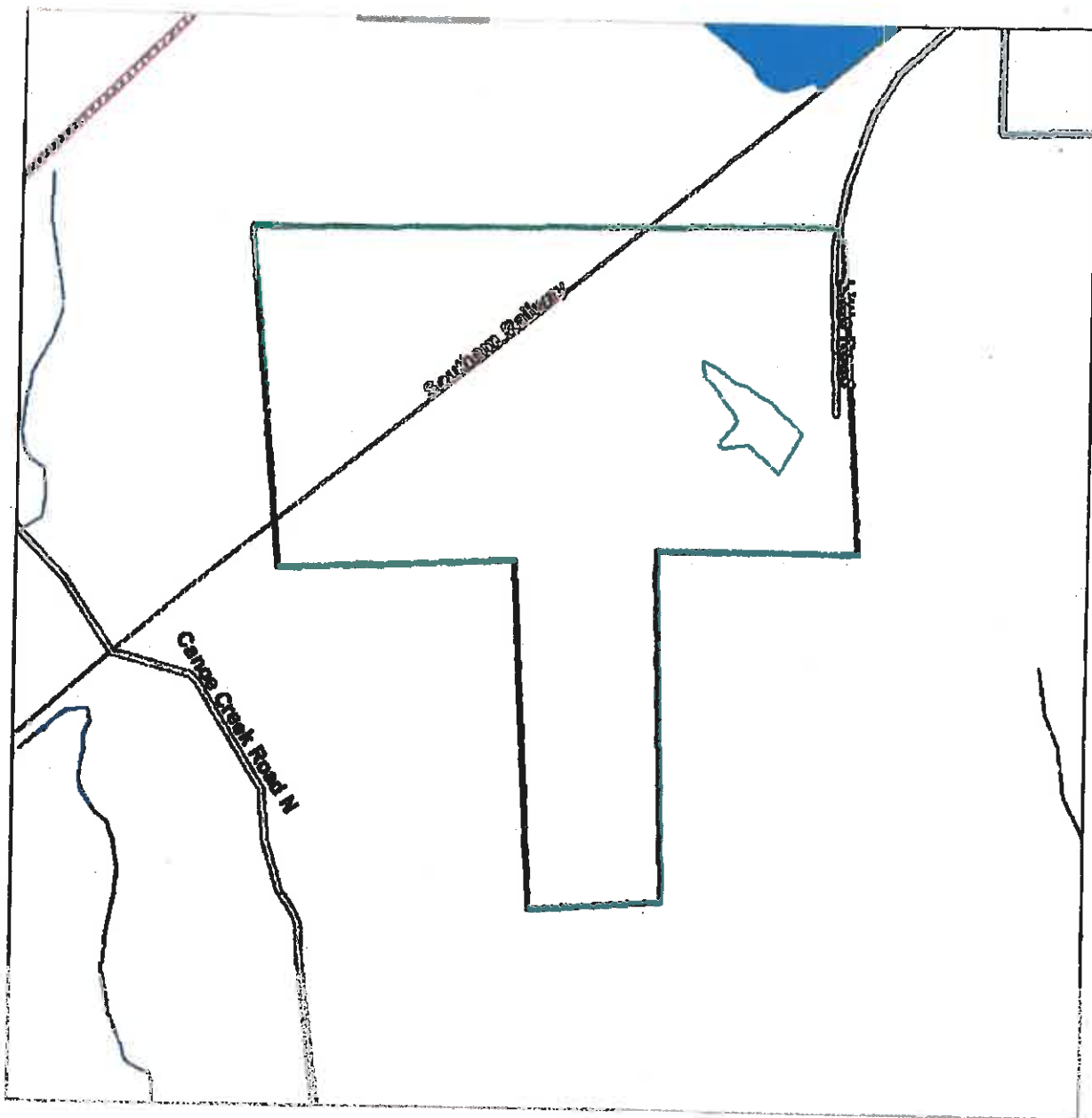
- Area Polygon
- Identified Site, Multiple Sites, Receptor
- NPL, DEI/NPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
- Tribal Land
- Railroads



Environmental FirstSearch
.25 Mile Radius from Area
Non-ASTM Map: No Sites Found



, STEELE AL 35897.



Source: 2005 U.S. Census TIGER Files

- Area Polygon
- Identified Site, Multiple Sites, Receptor
- NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
Triballand
- National Historic Sites and Landmark Sites
- Railroads



**APPENDIX D
QUALIFICATIONS**

QUALIFICATIONS AND SIGNATURES

STATEMENT OF QUALIFICATIONS

GMC has conducted numerous environmental site assessments within Alabama and surrounding states. GMC's staff is well trained and has a Registered Professional Engineer conducting or overseeing the assessment of each project. The qualifications and experience of GMC staff are attached herein.

CERTIFICATION

"We declare that to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in 312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312."


Melissa Mehaffey
Ecologist

2/20/12
Date


Stuart A. Blackwell, PWS
Environmental Professional

2/20/12
Date

STUART A. BLACKWELL

EDUCATION: B.S. Wildlife Biology
Auburn University

EXPERIENCE: Conducted Phase I Environmental Site Assessments in Alabama and Louisiana; conducting legal research, on-site inspections, historical review, and preparation of written reports.

Conducts construction storm water inspections in Alabama; prepares NPDES stormwater permits and site specific Best Management Practices (BMP).

Monitor well sampling, drilling, and abandonment.

Assisted in the development of the first wetland and stream mitigation bank in central Alabama. Includes field assessment of wetland functions and habitat classification, writing wetland restoration and creation management plans, coordination with the MBRT personnel, etc.

Proficient in evaluating habitat requirements, determining the amount of short-term and long-term impacts, and writing Endangered and Threatened species reports.

ADDITIONAL TRAINING "Phase I Environmental Site Assessments"
The Environmental Institute
1300 Williams Drive, Suite E, Marietta, GA
July 10-12, 2006
24-hour Seminar

MELISSA MEHAFPEY

EDUCATION: B.S. Ecology
University of Georgia

EXPERIENCE: Phase I Environmental Site Assessments in Alabama; conducting legal research, on-site inspections, historical review, and preparation of written reports.

Conducts construction storm water inspections in Alabama.

Experienced in delineating wetlands through examining soil type, vegetation, and hydrology; submitting reports to the U.S. Army Corps of Engineers for approval and documentation.

Taxonomic subsampling of macro-invertebrates.

Stream assessment, including biological, chemical, and physical sampling.

ADDITIONAL TRAINING "38-hour Army Corps of Engineers Wetland Delineation Training Program"
Richard Chinn Environmental Training, Inc.
February 15-18, 2011

"Phase I Environmental Site Assessments"
The Environmental Institute
1841 West Oak Parkway, Suite F
October 3-5, 2011

W. FINDLEY FRAZER

EDUCATION: B.E. Civil Engineering
Vanderbilt University

REGISTRATION: Registered Alabama Professional Engineer #27440
Certified FloodPlain Manager (CFM)

EXPERIENCE: Engineer dealing with environmental issues such as Phase I, II & III Environmental Site Assessments, storm water permitting, underground storage tank closures, surface and subsurface investigations, source water delineations contamination assessments and corrective action services, flood studies, detention basin design, wetland determinations and delineations, and Title V air permitting.

ADDITIONAL TRAINING

"Phase I Environmental Site Assessments"
The Environmental Institute
1300 Williams Drive, Suite E, Marietta, GA
July 10-12, 2006
24-hour Seminar

Alabama Air Regulatory Update
Sponsored by ADEM-Air Division & the Alabama Chapter-A&WMA
Embassy Suites Hotel-Montgomery, Alabama - May 25, 2004
8-hour seminar

Brownfield Redevelopment Seminar
6-hour seminar
Birmingham, Alabama November 6, 2003

Groundwater Seminar
ADEM 2002
16-hour seminar

APPENDIX E
REFERENCES

REFERENCES

- Environmental First Search Technology Corporation, 254 County Road 427 South #226, Longwood, FL 32750-5466, (407) 265-8900.
- Gregory C. Johnson, Robert E. Kidd, Celeste A. Journey, Humbert Zappia, and J. Brian Atkins Environmental Setting and Water-Quality Issues of the Mobile River Basin, Alabama, Georgia, Mississippi, and Tennessee. 2002.
- Mausbach, M. J. and Johnson, P. R. United States Department of Agriculture. Hydric Soils of the United States. 1995.
- United States Department of Agriculture, Natural Resources Conservation Service. Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov/>.
- United States Geological Survey. Steele, Alabama 7.5' Series Quadrangle Map, 1947, (Photo Revised 1972).
- University of Alabama Library - Historical Map Index. Web Soil Survey URL: <http://alabamamaps.ua.edu/aerials/index.html>.

PHASE I ENVIRONMENTAL SITE ASSESSMENT

**LITTLE CANOE CREEK INDUSTRIAL PARK
(PROPOSED 40 ACRE ADDITION)
ETOWAH COUNTY, ALABAMA**



Prepared For:
J. Patrick Simms
Etowah County Commission
800 Forest Avenue
Gadsden, AL 35901

Prepared By:



GOODWYN | MILLS | CAWOOD

2701 First Avenue South, Suite 100
Birmingham, Alabama 35233

March 14, 2014

TABLE OF CONTENTS

1.0	EXECUTIVE SUMMARY	1
2.0	INTRODUCTION	3
	2.1 Purpose	3
	2.2 Detailed Scope of Services	3
	2.3 Significant Assumptions	4
	2.4 Limitations and Exceptions	4
	2.5 Special Terms and Conditions	5
	2.6 User Reliance	5
3.0	SITE AND VICINITY DESCRIPTION	6
	3.1 Site Location and Legal Description	6
	3.2 Site and Vicinity Characteristics	6
	3.2.1 Surface Drainage	6
	3.2.2 Regional Characteristics and Geological Setting	6
	3.2.3 Hydrogeology	6
	3.2.4 Soils	7
	3.3 Current Use of Property	8
	3.4 Description of Structures, Roads, and Other Improvements on Site	8
	3.5 Current Use of Adjoining Properties	8
4.0	USER PROVIDED INFORMATION	9
	4.1 Environmental Liens	9
	4.2 Activity and Use Limitations	9
	4.3 Specialized Knowledge	9
	4.4 Valuation Reduction for Environmental Issues	9
	4.5 Commonly Known or Reasonably Ascertainable Information	9
	4.6 Owner, Property Manager, and Occupant Information	9
	4.7 Reason for Performing Phase I	9
5.0	RECORDS REVIEW	10
	5.1 Standard Records Review	10
	5.2 Additional Environmental Record Sources	14
	5.3 Physical Setting Source(s)	14
	5.4 Historical Use Information on the Property	14
6.0	SITE RECONNAISSANCE	15
	6.1 Methodology and Limiting Conditions	15
	6.2 General Site Setting	15
	6.3 Exterior Observations	15
	6.4 Interior Observations	15
7.0	INTERVIEWS	16
	7.1 Interview with User / Owner	16
	7.2 Interview with Previous Owner	16
	7.3 Interview with Corps of Engineers Representative	16
8.0	FINDINGS	17
9.0	OPINIONS AND CONCLUSION	18
	9.1 Opinions	18
	9.2 Conclusion	18
	9.3 Deviations	18
	9.4 Additional Services	18
10.0	REFERENCES	19
11.0	QUALIFICATIONS AND SIGNATURES OF PROFESSIONALS	20

APPENDICES

- I. Figures**
 - 1. General Location Map
 - 2. USGS Quadrangle Map, 1947 (photo revised 1972) Steele, Alabama
 - 3. Aerial Photograph
 - 4. Etowah County Soil Survey Map

- II. Photographs**

- III. Environmental Data Resources Radius Map Report**

- IV. Environmental Data Resources Aerial Photo Decade Package**

- V. ASTM E 1527-13 User Questionnaire**

- VI. Qualifications of Environmental Professional**

1.0 EXECUTIVE SUMMARY

Goodwyn, Mills and Cawood, Inc. (GMC) was retained by the Etowah County Commission (User) to conduct a Phase I Environmental Site Assessment (ESA) on an approximate 40± acre parcel located along Canoe Creek Road North near Steele, Alabama (Figure 1). The subject site is further described as being located Section 30 of Township-12-South, Range-5-East in Etowah County, Alabama. The center coordinates of the site are latitude 33° 58' 01" North, Longitude: 86° 09' 53" West (WGS84/NAD83) and it is located within the Middle Coosa Watershed (HUC Code 03150106).

This Phase I ESA includes a records review of state and federally listed facilities, maps, interviews, historical research, and visual observations of the site. A Phase I ESA does not include any testing or sampling of materials (i.e., soil, water, air, building materials, etc.).

GMC conducted an Environmental Data Resources (EDR) Radius Map Report review for the subject site based on the All Appropriate Inquiries (AAI) standard checklist with search distances relevant to each environmental database. This records review did not find any listings within the relative search distance for each database. Information regarding this records review is located in Section 5.1 and 5.2, and the EDR Radius Map Report is attached as Appendix III. In addition, GMC conducted a historical research of the property and noted that a majority of the subject site is within the former Camp Sibert property boundary. Camp Sibert was a former Army base used from 1942 to 1945 to train units and individuals in basic military training, the use of chemical weapons, decontamination procedures, and smoke operations. The subject site is located within "Site 19 - Conventional Mortar Impacts Areas" of the former camp. Based on previous studies, this particular site is not a suspect location for the disposal of chemical warfare material within the former camp boundary.

A representative of GMC conducted a site reconnaissance on March 10, 2014. On the date of the site visit, GMC noted that the site was undeveloped and forested in nature. Canoe Creek Road runs north and south and bisects the property. A railroad appears to run in a southwest to northeast direction across the northern portion of the site. No standing structures were noted on the property (see Appendix II for Photos).

A representative of GMC submitted a user questionnaire to Mr. Patrick Simms, with the Etowah County Commission, representative of the User and the owner of the property. He has no knowledge of any hazardous substances, spills, or contamination related to the site. In addition, a representative of GMC interviewed Sherri Anderson-Hudgins, a representative of the Corps of Engineers, in reference to the subject site in relation to the former Camp Sibert facility. She indicated that site reconnaissance had been conducted on the southern portion of the subject site and nothing was found to indicate potential contamination in relation to the former facility. She had no knowledge of spills, leaks, or environmental contamination associated with the property.

This report was completed in general accordance with the requirements established by the American Society for Testing and Materials (ASTM) E 1527-13 Standard and also meets the requirements of the AAI rule. This Assessment has revealed no evidence of Recognized Environmental Conditions (REC's), and no further investigation is recommended at this time.

2.0 INTRODUCTION

Goodwyn, Mills & Cawood, Inc. (GMC) was retained by the Etowah County Commission to perform a Phase I Environmental Site Assessment (ESA) on a 40-Acre parcel located near Steele, Etowah County, Alabama (Figure 1). This Phase I ESA includes a records review of state and federally listed facilities, maps, interviews, historical research, and visual observations of the site. A Phase I ESA does not include any testing or sampling of materials (i.e., soil, water, air, building materials, etc.).

2.1 Purpose

The purpose of a Phase I ESA is to conduct a records review, historical review, and visual site inspection to identify recognized environmental conditions at the subject site. The term recognized environmental conditions means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term includes hazardous substances or petroleum products, even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions.

2.2 Detailed Scope of Services

GMC conducted the Phase I ESA in general accordance with the AAI rule and the ASTM E 1527-13 Standard Practice for Environmental Site Assessments: Phase I ESA Process.

The scope of work performed as part of the Phase I ESA is as follows:

- A historical review of the use and improvements made to the subject site.
- A review of applicable building, zoning, planning, sewer, water, fire and environmental department records that would have information on or have an interest in the property and neighboring sites.
- An investigation of the subject property and neighboring properties with regard to the Environmental Protection Agency's (EPA) National Priorities List (NPL) or Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) list and similar state lists.
- An inspection of the site and all improvements with a visual inspection for hazardous materials and regulated non-hazardous materials.

- A review of available information to determine whether present owners or tenants have stored, created or discharged hazardous materials or waste, and, if applicable, a review of whether appropriate procedures and safeguards have been observed.
- A written report summarizing the findings with conclusions as to the potential environmental degradation believed to be associated with the property.

2.3 Significant Assumptions

This report provides an overview of potential, past, and present environmental conditions associated with the subject site. The report is limited to the information available at the time of the assessment. It is possible that unreported or illegal disposal of materials impairing the environmental condition of the subject site may have occurred which could not be identified. The conclusions and recommendations regarding the environmental conditions presented in this report are based on the scope of work authorized by the User. Virtually no scope of work, no matter how exhaustive, can identify all contaminants or all conditions above and below ground.

2.4 Limitations and Exceptions

GMC has performed this investigation for the exclusive use of the User, their lending institution and their legal counsel specifically for the subject site. GMC prohibits republication or reuse of any report without GMC's prior written consent.

The conclusions contained in this report are based upon the conditions at the site during the time of the investigation. As stated in the ASTM E 1527-13 standard and AAI, an environmental site assessment meeting or exceeding the standard and completed less than 180 days prior to the date of acquisition of the property or (for transactions not involving an acquisition) the date of the intended transaction is presumed to be valid.

Environmental problems at this site not included in the scope of work, if any, are not the responsibility of GMC. Examples of such problems are unreported releases, unreported sites, and sites not listed by the Alabama Department of Environmental Management (ADEM) or by the EPA.

GMC has made no attempt to independently verify the information provided by others, and cannot be held responsible for false or erroneous information that was provided to GMC. Any documents or information that was obtained by GMC in the preparation of this report is assumed to be true and accurate.

The only warranty made by GMC in connection with the services provided is that we have used the degree of skill and care ordinarily exercised by similarly situated professionals in our locality. No other warranty, expressed or implied, is made or intended. GMC will not be required to sign any documents, no matter by whom requested, that would result in GMC having to certify, guarantee or warrant the existence of conditions whose existence GMC cannot ascertain. The user also agrees not to

make resolution of any dispute with GMC or payment of any amount due to GMC in any way contingent upon GMC signing any such certification.

2.5 Special Terms and Conditions

The following are a list of issues that GMC specifically did not address in this ESA; however, the list is not exhaustive:

1. Asbestos-Containing Building Materials
2. Biological Agents
3. Cultural and Historic Resources
4. Ecological Resources
5. Endangered and Threatened Species
6. Health and Safety
7. Indoor Air Quality unrelated to releases of hazardous substances or petroleum products into the environment
8. Industrial Hygiene
9. Lead-Based Paint
10. Lead in Drinking Water
11. Mold
12. Radon
13. Regulatory Compliance
14. Wetlands or other Waters of the U.S.

2.6 User Reliance

The User may rely upon this document. The User's attorneys and other parties that are considered "interested parties" may rely upon this document by permission of the owner, and to the extent outlined in the AAI rule and ASTM E 1527-13 Standard. An environmental professional is not required to independently verify the information provided but may rely on information provided unless it is obvious that certain information is not correct based on other information or that he or she has actual knowledge that certain information is incorrect.

3.0 SITE AND VICINITY DESCRIPTION

3.1 Site Location and Legal Description

The subject site is located along Canoe Creek Road North near Steele, Alabama (Figure 1). The subject site is further described as being located in Section 30 of Township-12-South, Range-5-East in Etowah County, Alabama (see Figures 2 and 3). The center coordinates of the site are latitude 33° 58' 01" North, Longitude: 86° 09' 53" West (WGS84/NAD83). It is located within the Middle Coosa Watershed (HUC Code 03150106).

A complete updated legal description was not made available prior to the publication of this report.

3.2 Site and Vicinity Characteristics

3.2.1 Surface Drainage

According to the 1947 (photo revised 1972) Steele, Alabama U.S. Geological Survey Quadrangle Map, the elevation of the subject parcel is generally flat and lies between 560 and 600 feet above mean sea level. It appears that drainage from the property generally flows in a northerly direction and eventually flows into Little Canoe Creek (See Figure 2). The property lies within the Middle Coosa Watershed (HUC Code 03150106).

3.2.2 Regional Characteristics and Geological Setting

The subject site lies within the Valley and Ridge Physiographic Province and consists of a series of northeast-trending linear ridges and valleys underlain by alternating beds of hard and soft Paleozoic sedimentary rocks, which are highly faulted and folded and range in age from Cambrian to Pennsylvanian. The ridges are composed of cherty limestone, dolomite, and sandstones. The valleys are developed in more soluble limestone, dolomite, and shale. Resistant sandstone and chert underlie the ridges, and softer shale and limestone underlie the valleys. The Valley and Ridge Physiographic Province is included in the Southern Appalachian Ridges and Valleys Major Land Resource Area (MLRA). Soils in the valleys of the Southern Appalachian Ridges and Valleys were formed mainly in residuum of weathered limestone and are predominantly red, iron, and clay-rich types with silt loam surface textures. The ridges consist of cherty limestone that produce a gravelly loam and gravelly clay subsoil and a gravelly silt loam surface layer.

3.2.3 Hydrogeology

The site lies in Valley and Ridge Physiographic Province. Aquifers in this province consist of permeable geologic formations within folded and faulted Paleozoic sedimentary rocks. The rocks range in age from early to late Paleozoic. Most of the Valley and Ridge aquifers consist of limestone or dolomite. The carbonate rocks are productive aquifers primarily because of the solution openings in

the easily dissolved limestone and dolomite. These openings, which originate as bedding planes and joints in the carbonate rocks, are enlarged by percolating slightly acidic ground water, and become linked as a series of conduits that rapidly transmit large volumes of ground water through the carbonate rocks. The easily eroded carbonate rocks form wide valley floors, which are favorable areas for recharge. Other aquifers consist of sandstone formations but yield less water than do the carbonate rocks. Much of the water from the sandstone is obtained from fractures. Regolith, which acts as a porous media aquifer above the carbonate-rock aquifers, contains chert rubble of Cenozoic age that stores and transmits water slowly to the underlying fractured-rock aquifer.

3.24 Soils

According to the Natural Resource Conservation Service (NRCS) Etowah County Web Soil Survey Map, the following soils are found on the subject site (see Figure 7).

- Conasauga loam, 1 to 5 percent slopes (12)
These deep and moderately deep, well drained to moderately well drained, gently sloping soils (2 to 6 percent slopes) are on uplands. They have loamy surface layers and sticky, plastic, clayey subsoils. The root zone is deep, but plant roots may be restricted because of the clayey subsoil. These soils are difficult to till because of the high clay content in the upper subsoil. These soils are moderately well suited to row crops and small grains and well suited to hay crops and pasture. The erosion hazard is moderate. A combination of several conservation practices is needed on cultivated fields to control erosion and provide for proper water disposal. Cropping systems that include sod and close growing crops are usually needed in rotation with cultivated crops.
- Conasauga-Rock outcrop complex, 2 to 6 percent slopes (15)
These deep and moderately deep, well drained to somewhat poorly drained, strongly sloping and moderately steep soils (10 to 25 percent slopes except Conasauga ranges from 6 to 15 percent slopes) are on uplands. They have loamy surface layers and sticky and plastic clayey subsoils. The root zone can be penetrated by plant roots, but it is somewhat restricted by the clayey subsoil. These soils are not suited to row crops, small grains, and most hay crops. They are moderately well suited to sericea and poorly suited to other hay and pasture crops.
- Gaylesville silt loam (26)
These deep, poorly drained to somewhat poorly drained, nearly level soils (0 to 2 percent slopes) are on low stream terraces. They have loamy surface layers and clayey subsoils. The root zone is often restricted by a seasonally high water table. These soils are poorly suited to row crops, small grains and most hay crops and pasture because of wetness. These soils are moderately well suited to fescue and white clover in the northern part of the state. Soil wetness can be partially overcome by extensive surface drainage systems. The erosion hazard is slight.

The Gaylesville silt loam is listed as being hydric in the Hydric Soils of the United States (1995), Hydric Soils of Alabama (1995) and the Etowah County hydric soils list (2005). A hydric soil is one that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions in the upper horizons, which may cause it to be classified as a wetland and subject to the

jurisdiction of the U.S. Army Corps of Engineers.

3.3 Current Use of Property

Representatives of GMC visited the subject site on March 10, 2014. The property is currently undeveloped and forested land.

3.4 Description of Structures, Roads, and Other Improvements on Site

▪ **Structures**

There appeared to be no structures located on the property.

▪ **Roads**

Canoe Creek Road runs north and south and bisects the property. A railroad appears to run in a southwest to northeast direction across the northern portion of the site.

▪ **Potable Water Supply**

The property is undeveloped and currently does not have access to the city water system.

▪ **Sewage Disposal System**

The property is undeveloped and currently does not have access to the city sewer system.

3.5 Current Use of Adjoining Properties

Adjacent properties appear to be mostly forested in nature or utilized for agricultural purposes, with some residences located to the west of the property (see table below).

North	Forested, Undeveloped Land
South	Forested, Undeveloped Land
East	Forested, Undeveloped Land
West	Residential/Pastureland

4.0 USER PROVIDED INFORMATION

The ASTM E 1527-13 User Questionnaire was completed by Mr. Patrick Simms with the Etowah County Commission. A summary of his responses are provided below and a copy of the completed User Questionnaire can be found in Appendix V.

4.1 Environmental Liens

The User indicated that there are no known environmental liens filed or recorded against the property.

4.2 Activity and Use Limitations

The User has no knowledge of any activity or use limitations against the subject property.

4.3 Specialized Knowledge

The User does not have any specialized knowledge related the subject site.

4.4 Valuation Reduction for Environmental Issues

The User has no knowledge of a reduction of value due to environmental issues associated with the property.

4.5 Commonly Known or Reasonably Ascertainable Information

The User was unaware of the past uses of the property, specific chemicals associated with the property, spill or chemical releases associated with the property, or environmental cleanups associated with the properties.

4.6 Owner, Property Manager, and Occupant Information

Etowah County is the current owner of the property and was previously owned by Josephine Hood. The property is currently unoccupied and undeveloped.

4.7 Reason for Performing Phase I

A Phase I ESA is being performed at the request of the User as part of a "due diligence" evaluation to determine the environmental condition of the subject site.

5.0 RECORDS REVIEW

The purpose of the records review is to obtain and review records that will help identify recognized environmental conditions in connection with the property.

Some records reviewed pertain not only to the property, but also to properties with an additional approximate search distance in order to help assess the likelihood of problems from migrating hazardous substances or petroleum products. Unless stated otherwise, the approximate minimum search distances used below were as specified in the ASTM Standard E 1527-13.

5.1 Standard Records Review

GMC conducted an EDR Radius Map Report review for the subject site. Below is the AAI standard checklist of environmental databases reviewed with search distances relevant to each database. These databases are from the EPA and the ADEM. They are reviewed to determine if records exist of previous contamination episodes having occurred within the following approximate minimum search distance from the subject site:

<u>List</u>	<u>Search distance</u>
	<u>Miles</u>
Federal NPL	1.0
Federal Delisted NPL	1.0
Federal CERCLIS	0.5
Federal CERCLIS NFRAP	0.5
Federal RCRA CORRACT	1.0
Federal RCRA Non-CORRACTS TSD	0.5
Federal RCRA Generators	0.25
Federal IC/EC	0.5
Federal ERNS	TP
State and Tribal Equivalent CERCLIS	1.0
State and Tribal Landfill and/or SWL	0.5
State and Tribal Leaking Storage Tank	0.5
State and Tribal Registered Storage Tank	0.25
State and Tribal IC/EC	0.5
State and Tribal Voluntary Cleanup	0.5
State and Tribal Brownfields	0.5
Additional Environmental Records	TP

The databases above were reviewed for pertinent information and they revealed the following:

1. **Federal NPL Site List (October 2013)**
NPL: National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large

areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

- None currently listed within the minimum 1.0-mile search area.
2. **Federal Delisted NPL Site List (October 2013)**
Delisted NPL: National Priority List Deletions. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.
 - None currently listed within the minimum 1.0-mile search distance.
 3. **Federal CERCLIS List (April 2013)**
CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System. CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.
 - None currently listed within the minimum 0.5-mile search distance.
 4. **Federal CERCLIS NFRAP Site List (May 2013)**
CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned. Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.
 - None currently listed within the minimum 0.5-mile search distance.
 5. **Federal RCRA CORRACTS Facilities List (September 2013)**
CORRACTS: Correction Action Report. CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.
 - None currently listed within the minimum 1.0-mile search area.
 6. **Federal RCRA Non-CORRACTS TSD Facilities List (September 2013)**
RCRA-TSDF: RCRA – Treatment, Storage and Disposal. RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act

(RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

- None currently listed within the minimum 0.50-mile search distance.

7. Federal RCRA Generators List (September 2013)

RCRA-LQG: RCRA – Large Quantity Generators. RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

- None currently listed within the minimum 0.25-mile search distance.

8. Federal Institutional Controls / Engineering Controls Registries (December 2013)

US INST CONTROLS: Sites with Institutional Controls. This registry contains a listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

US ENG CONTROLS: Engineering Controls Sites List. This registry contains a listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

- None currently listed within the minimum 0.50-mile search distance.

9. Federal ERNS List (September 2013)

ERNS: Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

- None currently listed within the target property.

10. State- and tribal- equivalent CERCLIS (December 2012)

SHWS: Hazardous Substance Cleanup Fund. This listing provides hazardous substance sites, which pose a threat to public health and the environment, which will be cleaned up utilizing the Hazardous Substance Cleanup Fund.

- None currently listed within the minimum 1.0-mile search distance.
11. **State and Tribal Landfill and/or Solid Waste Disposal Site Lists (June 2011)**
SWF/LF: Permitted Landfills, Solid Waste Facilities/Landfill Sites. SWF/LF records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.
- None currently listed within the minimum 0.50-mile search distance.
12. **State and Tribal Leaking Storage Tank Lists (September 2013)**
LUST: Leaking Underground Storage Tank. Leaking Underground Storage Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.
- None currently listed within the minimum 0.50-mile search distance.
13. **State and Tribal Registered Storage Tank Lists (November 2013)**
UST: Underground Storage Tank Information. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.
- None currently listed within the minimum 0.25-mile search distance.
14. **State and Tribal Institutional Control / Engineering Control Registries (August 2009)**
ENG CONTROLS: Engineering Controls Site Listing. This registry includes a listing of sites with engineering controls included in the Land Division Cleanup Program Inventory Listing.
- INST CONTROLS: Land Division Brownfields 128(a) Program Site Listing. Institutional Controls (ICs) are non-engineered instruments, such as administrative and/or legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of a remedy by limiting land or resource use. There are five different types of controls including: governmental, proprietary, enforcement tools with IC components, informational devices, and unrestricted.*
- None currently listed within the minimum 0.50-mile search distance.
15. **State and Tribal Voluntary Cleanup Sites (September 2013)**
VCP: Cleanup Program Inventory. Currently the Cleanup Inventory List contains information about sites undergoing assessment and possible cleanup under Alabama's Brownfield Redevelopment and Voluntary Cleanup Program. It also includes sites that have exited the program but were remediated to less than unrestricted levels.
- None currently listed within the minimum 0.50-mile search distance.

16. State and Tribal Brownfields Sites (September 2013)

BROWNFIELDS: Land Division Brownfields 128(a) Program Site Listing. *The directory provides a brief look at sites being marketed as Brownfields, and a listing of Brownfields activities performed by ADEM. Brownfields are defined as real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.*

- None currently listed within the minimum 0.50-mile search distance.

Orphan sites are sites that could not be mapped by the EDR First Search database due to lack of address information and could not be verified by GMC during the site inspection. There are a total of twenty (20) orphan sites listed within the zip code of the subject site. It did not appear that these facilities were located on the subject site or adjacent to the subject site. No further information was collected from the EDR First Search records review on the orphan sites for this report.

5.2 Additional Environmental Record Sources

Additional environmental record sources include local brownfield lists, local lists of landfill/solid waste disposal sites, local lists of hazardous waste/contaminated sites, local land records, records of emergency release reports, and other ascertainable records.

The EDR Radius Map Report lists no facilities within the relative minimum search distance for additional environmental records.

5.3 Physical Setting Source(s)

The subject parcel was found on the 1947 (photo revised 1972) Steele, Alabama quadrangle map.

5.4 Historical Use Information on the Property

A majority of the subject site is within the former Camp Sibert property boundary. Camp Sibert was a former Army base used from 1942 to 1945 to train units and individuals in basic military training, the use of chemical weapons, decontamination procedures, and smoke operations. The subject site is located within "Site 19 - Conventional Mortar Impacts Areas" of the former camp. Based on previous studies, this particular site is not a suspect location for the disposal of chemical warfare material within the former camp boundary.

GMC conducted an EDR Aerial Photo Decade Package review for the subject site to gain information on historical use of the property and its adjoining area. This package includes historical aerial photos taken in 1969, 1972, 1975, 1992, 1997, 2005, 2006, 2009, and 2011 (Appendix IV). All of the aerial photos indicate that the property is undeveloped as it is in its current condition.

6.0 SITE RECONNAISSANCE

6.1 Methodology and Limiting Conditions

On March 10, 2014, a representative of GMC conducted a reconnaissance at and within an approximate 1-mile radius around the subject site. Except for the limitations and exceptions discussed in Section 2.4, this Phase I ESA complies with ASTM Standard E 1527-13.

6.2 General Site Setting

The subject site is a 40+/- acre parcel is located along Canoe Creek Road North near Steele, Alabama (Figure 3). Adjacent properties appear to be mostly undeveloped and forested in nature or utilized for agricultural purposes, with some residences located to the west of the property.

6.3 Exterior Observations

On the date of the site visit, GMC noted that the site was undeveloped and forested in nature. Canoe Creek Road runs north and south and bisects the property. A railroad appears to run in a southwest to northeast direction across the northern portion of the site. No standing structures were noted on the property (see Appendix II for Photos).

6.4 Interior Observations

On the date of the site visit, there were no structures on site; therefore no interior observations were made.

7.0 INTERVIEWS

The purpose of interviews is to obtain information indicating recognized environmental conditions in connection with the property.

7.1 Interview with User / Owner

A representative of GMC submitted a user questionnaire to Mr. Patrick Simms, with the Etowah County Commission, representative of the User and the owner of the property. He has no knowledge of any hazardous substances, spills, or contamination related to the site.

7.2 Interview with Previous Owner

A representative of GMC made several attempts to contact the previous owner of the property to gain further information regarding the environmental condition of the property. To this date of this report, the previous owner could not be contacted.

7.3 Interview with Corps of Engineers Representative

A representative of GMC interviewed Sherri Anderson-Hudgins, a representative of the Corps of Engineers, in reference to the subject site in relation to the former Camp Sibert facility. She indicated that site reconnaissance had been conducted on the southern portion of the subject site and nothing was found to indicate potential contamination in relation to the former facility. She had no knowledge of spills, leaks, or environmental contamination associated with the property.

8.0 FINDINGS

The environmental conditions associated with the property include the following:

- GMC conducted an Environmental Data Resources (EDR) Radius Map Report review for the subject site based on the All Appropriate Inquiries (AAI) standard checklist with search distances relevant to each environmental database. This records review did not find any listings within the relative search distance for each database. Information regarding this records review is located in Section 5.1 and 5.2, and the EDR Radius Map Report is attached as Appendix III.
- GMC conducted a historical research of the property and noted that a majority of the subject site is within the former Camp Sibert property boundary. Camp Sibert was a former Army base used from 1942 to 1945 to train units and individuals in basic military training, the use of chemical weapons, decontamination procedures, and smoke operations. The subject site is located within "Site 19 - Conventional Mortar Impacts Areas" of the former camp. Based on previous studies, this particular site is not a suspect location for the disposal of chemical warfare material within the former camp boundary.
- A representative of GMC conducted a site reconnaissance on March 10, 2014. On the date of the site visit, GMC noted that the site was undeveloped and forested in nature. Canoe Creek Road runs north and south and bisects the property. A railroad appears to run in a southwest to northeast direction across the northern portion of the site. No standing structures were noted on the property (see Appendix II for Photos).
- No distressed vegetation or evidence of reportable quantities of spills or releases of hazardous chemicals on-site were identified on the day of the site visit.
- A representative of GMC submitted a user questionnaire to Mr. Patrick Simms, with the Etowah County Commission, representative of the User and the owner of the property. He has no knowledge of any hazardous substances, spills, or contamination related to the site. In addition, a representative of GMC interviewed Sherri Anderson-Hudgins, a representative of the Corps of Engineers, in reference to the subject site in relation to the former Camp Sibert facility. She indicated that site reconnaissance had been conducted on the southern portion of the subject site and nothing was found to indicate potential contamination in relation to the former facility. She had no knowledge of spills, leaks, or environmental contamination associated with the property.

9.0 OPINIONS AND CONCLUSION

9.1 Opinions

In GMC's opinion, the subject site located in Section 30 of Township-12-South, Range-5-East in Etowah County, Alabama has not revealed evidence of any recognized environmental conditions and further investigation is not deemed necessary at this time. These opinions are based on the findings outlined in Section 8.0 of this report.

9.2 Conclusion

In conclusion, GMC has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-13 for the subject site, located in Section 30 of Township-12-South, Range-5-East in Etowah County, Alabama, the *property*. Any exceptions to, or deletions from, this practice are described in Section 2.4 and Section 9.3 of this report. This assessment has revealed no evidence of *recognized environmental conditions* in connection with the *property*.

9.3 Deviations

Except for the limitations and exceptions discussed in Section 2.4, this Phase I ESA complies with ASTM Standard E 1527-13.

9.4 Additional Services

No additional services were performed in connection with this document.

10.0 REFERENCES

Alabama Department of Environmental Management (ADEM) -- EFile records search URL:
<http://edocs.adem.alabama.gov/eFile/>

Environmental Data Resources, Inc., 6 Armstrong Road, 4th floor Shelton, CT 06484, (800) 352-0050.

Gregory C. Johnson, Robert E. Kidd, Celeste A. Journey, Humbert Zappia, and J. Brian Atkins
Environmental Setting and Water-Quality Issues of the Mobile River Basin, Alabama, Georgia, Mississippi, and Tennessee. 2002.

Mausbach, M. J. and Johnson, P. R. United States Department of Agriculture. Hydric Soils of the United States. 1995.

Southeast Regional Climate Center, Historical climate summaries for Alabama, accessed at
http://www.sercc.com/climateinfo/historical/historical_al.html on February 07, 2014.

United States Department of Agriculture, Natural Resources Conservation Service. Web Soil Survey
URL: <http://websoilsurvey.nrcs.usda.gov/>

United States Geological Survey. Steele, Alabama 7.5' Series Quadrangle Map, 1947, (Photo Revised 1972). United States Geological Survey 7.5-minute series topographic map, 1:24,000 scale.

11.0 QUALIFICATIONS AND SIGNATURES OF PROFESSIONALS

STATEMENT OF QUALIFICATIONS

We declare that, to the best of our professional knowledge and belief, we meet the definition of *environmental professionals* as defined in §312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the subject *property*. We have performed the all appropriate inquiries in conformance with the standards and practices set for in 40 CFR Part 312. GMC has conducted numerous environmental site assessments within Alabama and surrounding states. GMC's staff is well trained and has a Professional Engineer, a Registered Environmental Property Assessor (REPA), and a Professional Geologist conducting or overseeing the assessment of each project. The qualifications and experience of GMC staff are attached in Appendix VI.

CERTIFICATION

"I certify that this site assessment has been conducted in accordance with ASTM codes and in accordance with assessment practices conducted by similarly situated environmental professionals in this area. All information collected was reviewed and the collecting of information was overseen by a person qualified to conduct environmental site assessments. The information submitted herein, to the best of my knowledge and belief, is true, accurate, and complete."

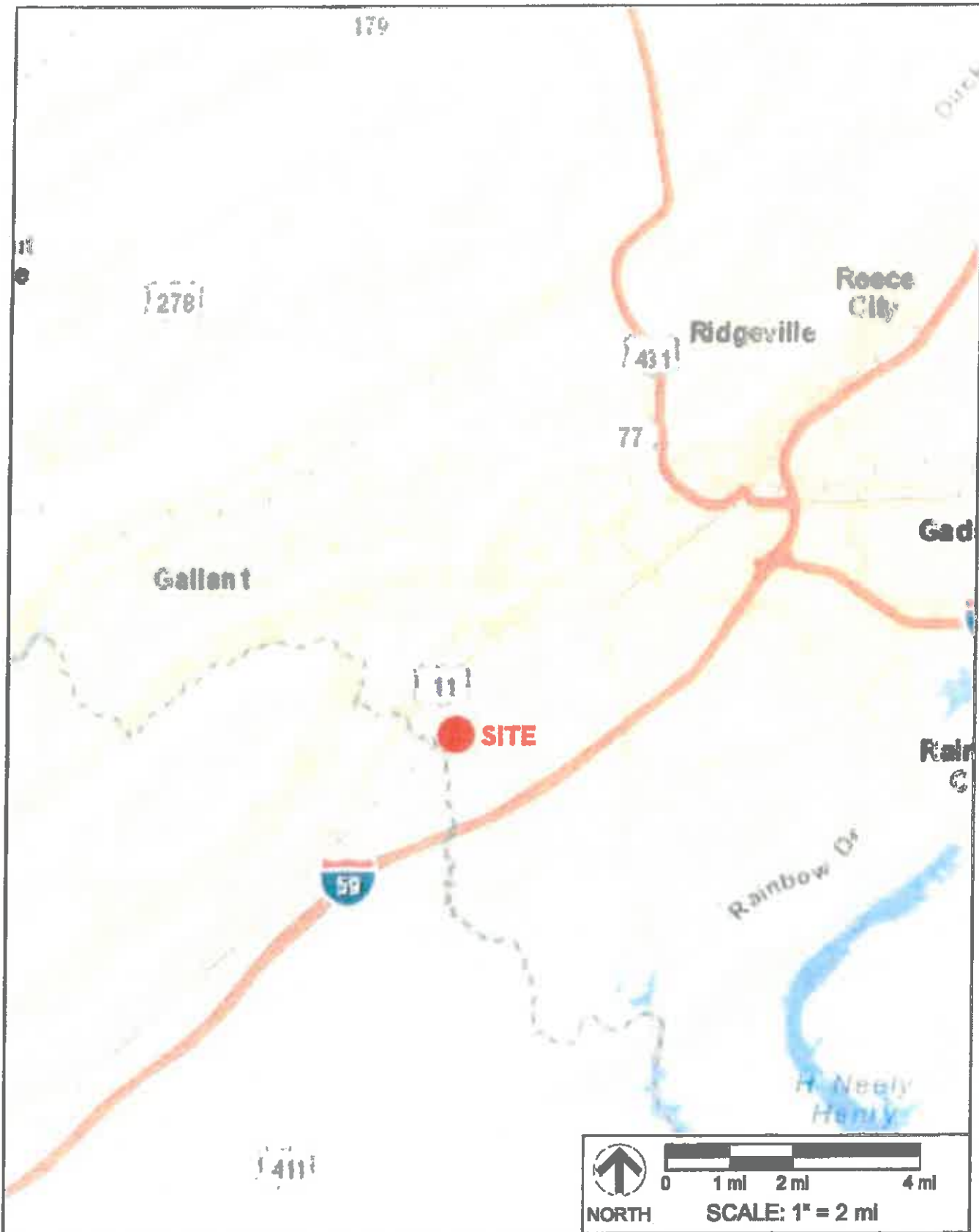


Stuart Blackwell, FWS
Environmental Department Manager
Birmingham Office

03/14/2014

Date

**APPENDIX I
FIGURES**



REF. SHEET: 2009 MICROSOFT VIRTUAL EARTH ROADS
 DESCRIPTION: PHASE I ENVIRONMENTAL SITE ASSESSMENT

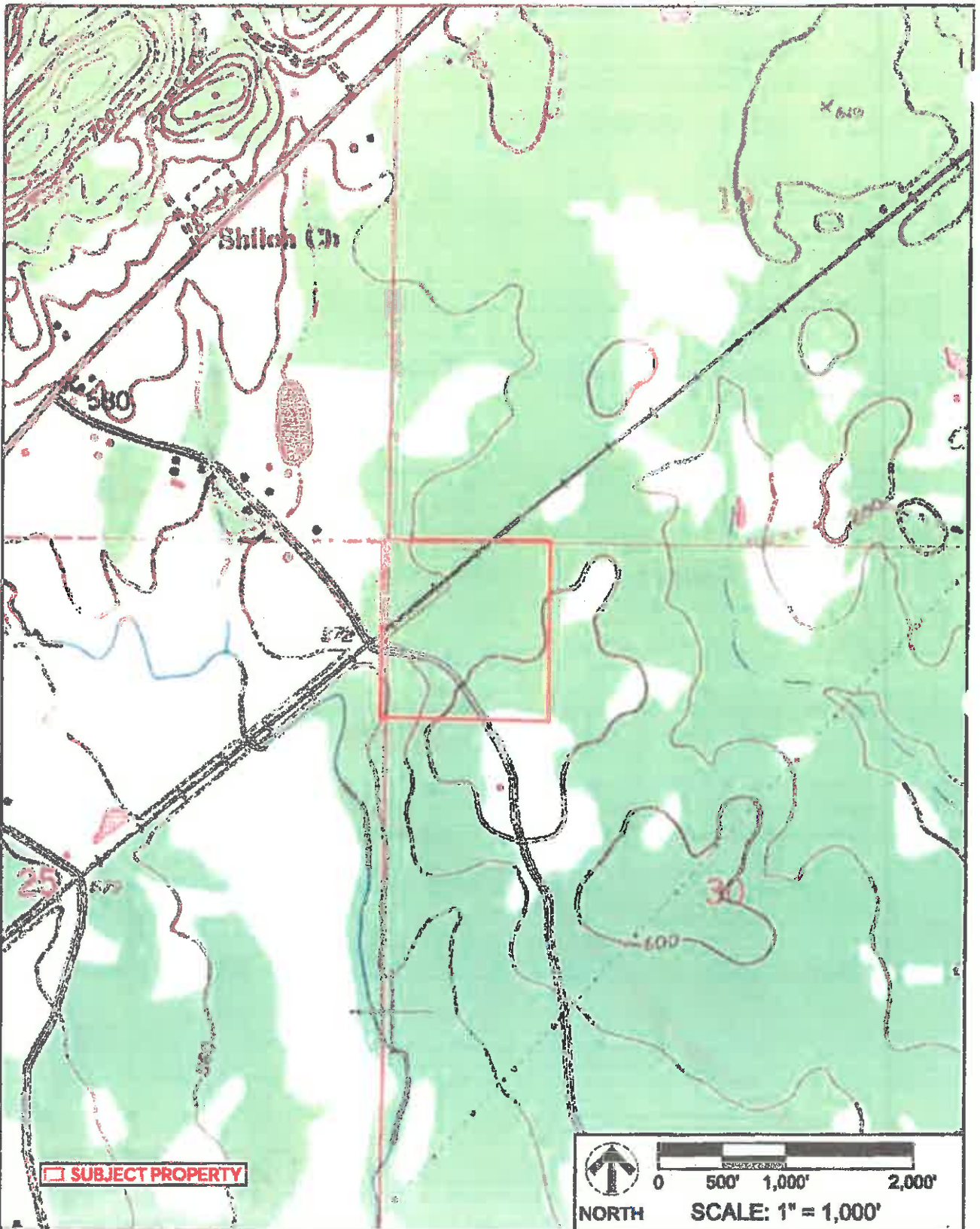
LITTLE CANOE CREEK - 40 ACRES
 ETOWAH COUNTY, ALABAMA

FIGURE 1

GENERAL LOCATION MAP
 GMC # ERM145002
 DATE: 5/7/2014
 DRAWN BY: JZH

GOODWYN | MILLS | CAWOOD

2660 East Chase Lane, Suite 200 | Montgomery, AL 36117
 Tel 254.271.3200 | GMCNETWORK.COM



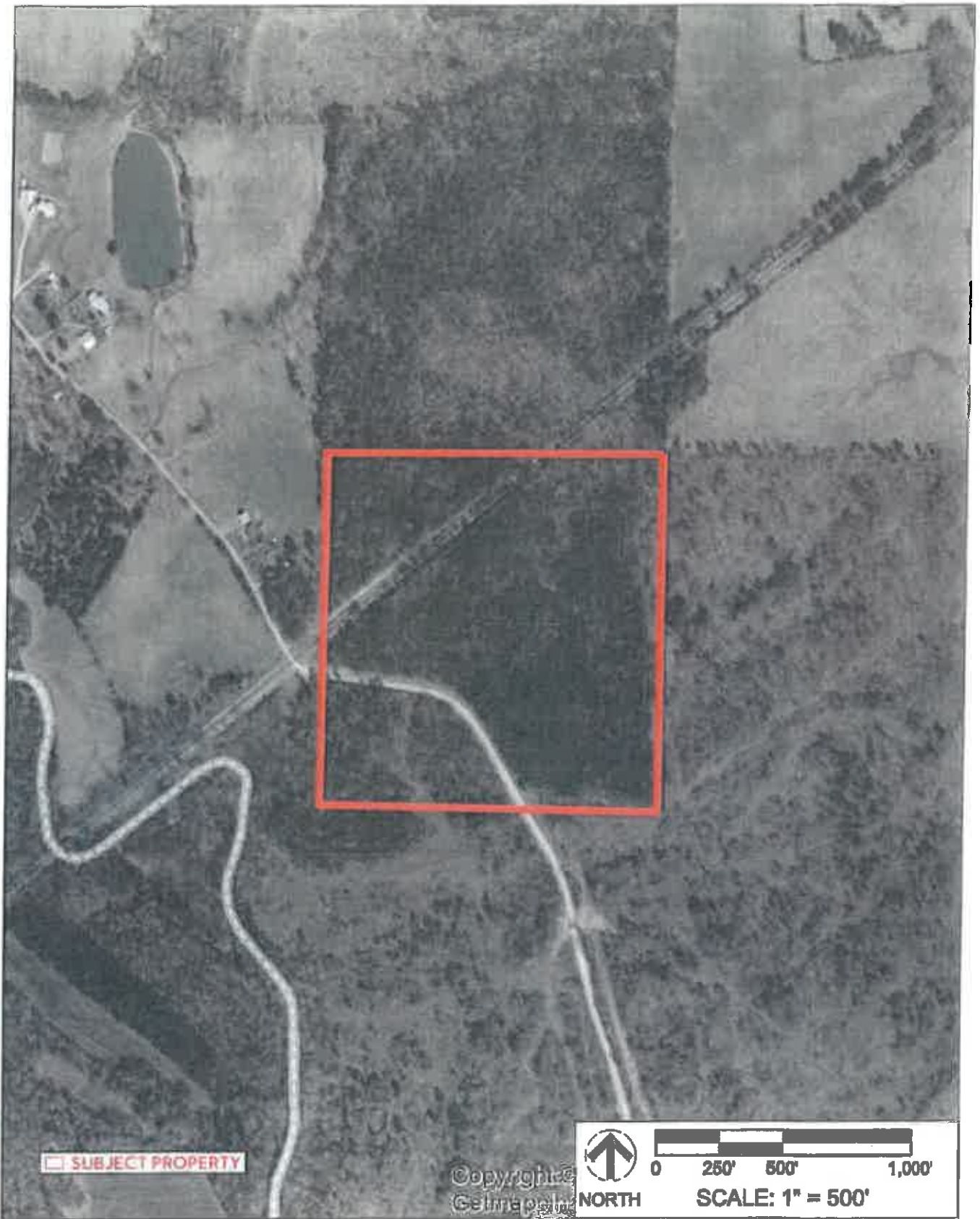
REF. SHEET: 2007 USDA AERIAL PHOTOGRAPH
 DESCRIPTION: PHASE I ENVIRONMENTAL SITE ASSESSMENT
LITTLE CANOE CREEK - 40 ACRES
 ETOWAH COUNTY, ALABAMA

FIGURE 2

USGS QUAD MAP
 GMC # EBHM146002
 DATE: 3/7/2004
 DRAWN BY: JZH

 **GOODWYN | MILLS | CAWOOD**


2640 East Chase Lane, Suite 200 | Montgomery, AL 36117
 Tel 334.271.8200 | GMCNETWORK.COM



 SUBJECT PROPERTY

Copyright
GeoMap

 NORTH



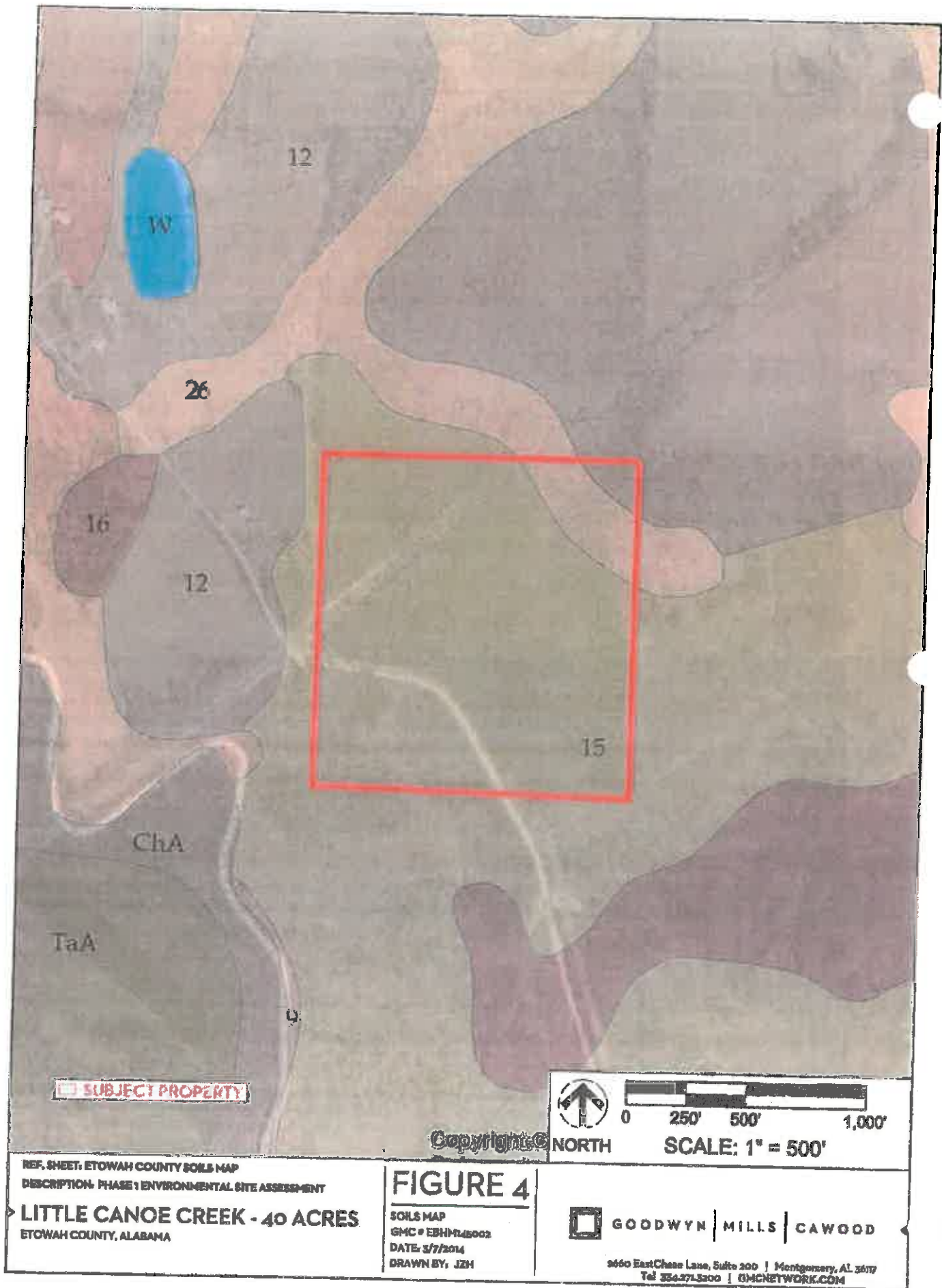
SCALE: 1" = 500'

REF. SHEET: 2007 USDA AERIAL PHOTOGRAPH
 DESCRIPTION: PHASE I ENVIRONMENTAL SITE ASSESSMENT
LITTLE CANOE CREEK - 40 ACRES
 ETOWAH COUNTY, ALABAMA

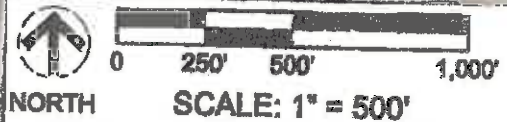
FIGURE 3
 AERIAL PHOTOGRAPH
 GMC # EBN-145002
 DATE: 3/1/2014
 DRAWN BY: JZH

 **GOODWYN | MILLS | CAWOOD**

2660 East Chase Lane, Suite 200 | Montgomery, AL 36117
 Tel 334.271.3200 | GMCNETWORK.COM



SUBJECT PROPERTY



REF. SHEET: ETOWAH COUNTY SOILS MAP
 DESCRIPTION: PHASE I ENVIRONMENTAL SITE ASSESSMENT

LITTLE CANOE CREEK - 40 ACRES
 ETOWAH COUNTY, ALABAMA

FIGURE 4

SOILS MAP
 GMC # EBH-145002
 DATE: 3/7/2014
 DRAWN BY: JZH

GOODWYN | MILLS | CAWOOD

9600 East Chase Lane, Suite 200 | Montgomery, AL 36117
 Tel 354.271.3200 | GIMNETWORK.COM

**APPENDIX II
PHOTOGRAPHS**

P-1



General view of Canoe Creek Road which bisects the property.

P-2



View of the railroad crossing at Canoe Creek Road.

 **GOODWYN | MILLS | CAWOOD**

P-3



View of railroad which is located on the property.

P-4



General view of the site conditions.



GOODWYN | MILLS | CAWOOD

P-5



General view of the site conditions.

P-6



General view of the site conditions.



GOODWYN | MILLS | CAWOOD

P-7



General view of Canoe Creek Road which bisects the property.

P-8



General view of the site conditions.

 **GOODWYN | MILLS | CAWOOD**

APPENDIX III
ENVIRONMENTAL DATA RESOURCES
RADIUS MAP REPORT

Little Canoe Creek - 40 Acres
1260-1299 CANOE CREEK RD
Attalla, AL 35954

Inquiry Number: 3863546.2s
February 24, 2014

The EDR Radius Map™ Report with GeoCheck®



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.362.0050
www.edrnet.com

FORM-ED-DVV

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
Executive Summary.....	ES1
Overview Map.....	2
Detail Map.....	3
Map Findings Summary.....	4
Map Findings.....	7
Orphan Summary.....	8
Government Records Searched/Data Currency Tracking.....	GR-1
 <u>GEOCHECK ADDENDUM</u>	
Physical Setting Source Addendum.....	A-1
Physical Setting Source Summary.....	A-2
Physical Setting SSURGO Soil Map.....	A-5
Physical Setting Source Map.....	A-12
Physical Setting Source Map Findings.....	A-14
Physical Setting Source Records Searched.....	A-11

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

1260-1299 CANOE CREEK RD
ATTALLA, AL 35954

COORDINATES

Latitude (North): 33.9859000 - 33° 57' 57.24"
Longitude (West): 86.1648000 - 86° 9' 53.26"
Universal Transverse Mercator: Zone 18
UTM X (Meters): 577162.5
UTM Y (Meters): 3758495.0
Elevation: 615 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 33086-H2 STEELE, AL
Most Recent Revision: 1972

AERIAL PHOTOGRAPHY IN THIS REPORT

Photo Year: 2011
Source: USDA

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL..... National Priority List

EXECUTIVE SUMMARY

Proposed NPL..... Proposed National Priority List Sites
NPL LIENS..... Federal Superfund Liens

Federal Delisted NPL site list

Delisted NPL..... National Priority List Deletions

Federal CERCLIS list

CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System
FEDERAL FACILITY..... Federal Facility Site Information listing

Federal CERCLIS NFRAP site List

CERC-NFRAP..... CERCLIS No Further Remedial Action Planned

Federal RCRA CORRACTS facilities list

CORRACTS..... Corrective Action Report

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF..... RCRA - Treatment, Storage and Disposal

Federal RCRA generators list

RCRA-LQG..... RCRA - Large Quantity Generators
RCRA-SQG..... RCRA - Small Quantity Generators
RCRA-CESQG..... RCRA - Conditionally Exempt Small Quantity Generator

Federal institutional controls / engineering controls registries

US ENG CONTROLS..... Engineering Controls Sites List
US INST CONTROL..... Sites with Institutional Controls
LUCIS..... Land Use Control Information System

Federal ERNS list

ERNS..... Emergency Response Notification System

State- and tribal - equivalent CERCLIS

SHWS..... Hazardous Substance Cleanup Fund

State and tribal landfill and/or solid waste disposal site lists

SWF/LF..... Permitted Landfills

State and tribal leaking storage tank lists

LUST..... Leaking Underground Storage Tank Listing
LAST..... List of AST Release Incidents
INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

State and tribal registered storage tank lists

UST..... Underground Storage Tank Information

EXECUTIVE SUMMARY

AST..... Aboveground Storage Tank Sites
INDIAN UST..... Underground Storage Tanks on Indian Land
FEMA UST..... Underground Storage Tank Listing

State and tribal institutional control / engineering control registries

ENG CONTROLS..... Engineering Controls Site Listing
INST CONTROL..... Land Division Brownfields 128(a) Program Site Listing
AUL..... Environmental Covenants

State and tribal voluntary cleanup sites

INDIAN VCP..... Voluntary Cleanup Priority Listing
VCP..... Cleanup Program Inventory

State and tribal Brownfields sites

BROWNFIELDS..... Land Division Brownfields 128(a) Program Site Listing

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS..... A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

ODL..... Open Dump Inventory
DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations
SWRCY..... Recycling/Recovered Materials Processors Directory
INDIAN ODL..... Report on the Status of Open Dumps on Indian Lands

Local Lists of Hazardous waste / Contaminated Sites

US CDL..... Clandestine Drug Labs
AOCONCERN..... Area of Concern
CDL..... Clandestine Methamphetamine Lab Sites
US HIST CDL..... National Clandestine Laboratory Register

Local Land Records

LIENS 2..... CERCLA Lien Information

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System
SPILLS..... Emergency Response Data

Other Ascertainable Records

RCRA NonGen / NLR..... RCRA - Non Generators
DOT OPS..... Incident and Accident Data
DOD..... Department of Defense Sites
FUDS..... Formerly Used Defense Sites

EXECUTIVE SUMMARY

CONSENT.....	Superfund (CERCLA) Consent Decrees
ROD.....	Records Of Decision
UMTRA.....	Uranium Mill Tailings Sites
US MINES.....	Mines Master Index File
TRIS.....	Toxic Chemical Release Inventory System
TSCA.....	Toxic Substances Control Act
FTTS.....	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
HIST FTTS.....	FIFRA/TSCA Tracking System Administrative Case Listing
SSTS.....	Section 7 Tracking Systems
ICIS.....	Integrated Compliance Information System
PADS.....	PCB Activity Database System
MLTS.....	Material Licensing Tracking System
RADINFO.....	Radiation Information Database
FINDS.....	Facility Index System/Facility Registry System
RAATS.....	RCRA Administrative Action Tracking System
RMP.....	Risk Management Plans
UIC.....	UIC Listing
NPDES.....	NPDES Permit Listing
DRYCLEANERS.....	Drycleaner Facility Listing
TIER 2.....	Tier 2 Data Listing
INDIAN RESERV.....	Indian Reservations
SCRD DRYCLEANERS.....	State Coalition for Remediation of Drycleaners Listing
EPA WATCH LIST.....	EPA WATCH LIST
2020 COR ACTION.....	2020 Corrective Action Program List
LEAD SMELTERS.....	Lead Smelter Sites
PCB TRANSFORMER.....	PCB Transformer Registration Database
COAL ASH EPA.....	Coal Combustion Residues Surface Impoundments List
US FIN ASSUR.....	Financial Assurance Information
Financial Assurance.....	Financial Assurance Information Listing
US AIRS.....	Aerometric Information Retrieval System Facility Subsystem
PRP.....	Potentially Responsible Parties
COAL ASH DOE.....	Steam-Electric Plant Operation Data
COAL ASH.....	Coal Ash Disposal Sites

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP.....	EDR Proprietary Manufactured Gas Plants
EDR US Hist Auto Stat.....	EDR Exclusive Historic Gas Stations
EDR US Hist Cleaners.....	EDR Exclusive Historic Dry Cleaners

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA LUST.....	Recovered Government Archive Leaking Underground Storage Tank
RGA HWS.....	Recovered Government Archive State Hazardous Waste Facilities List

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were not identified.

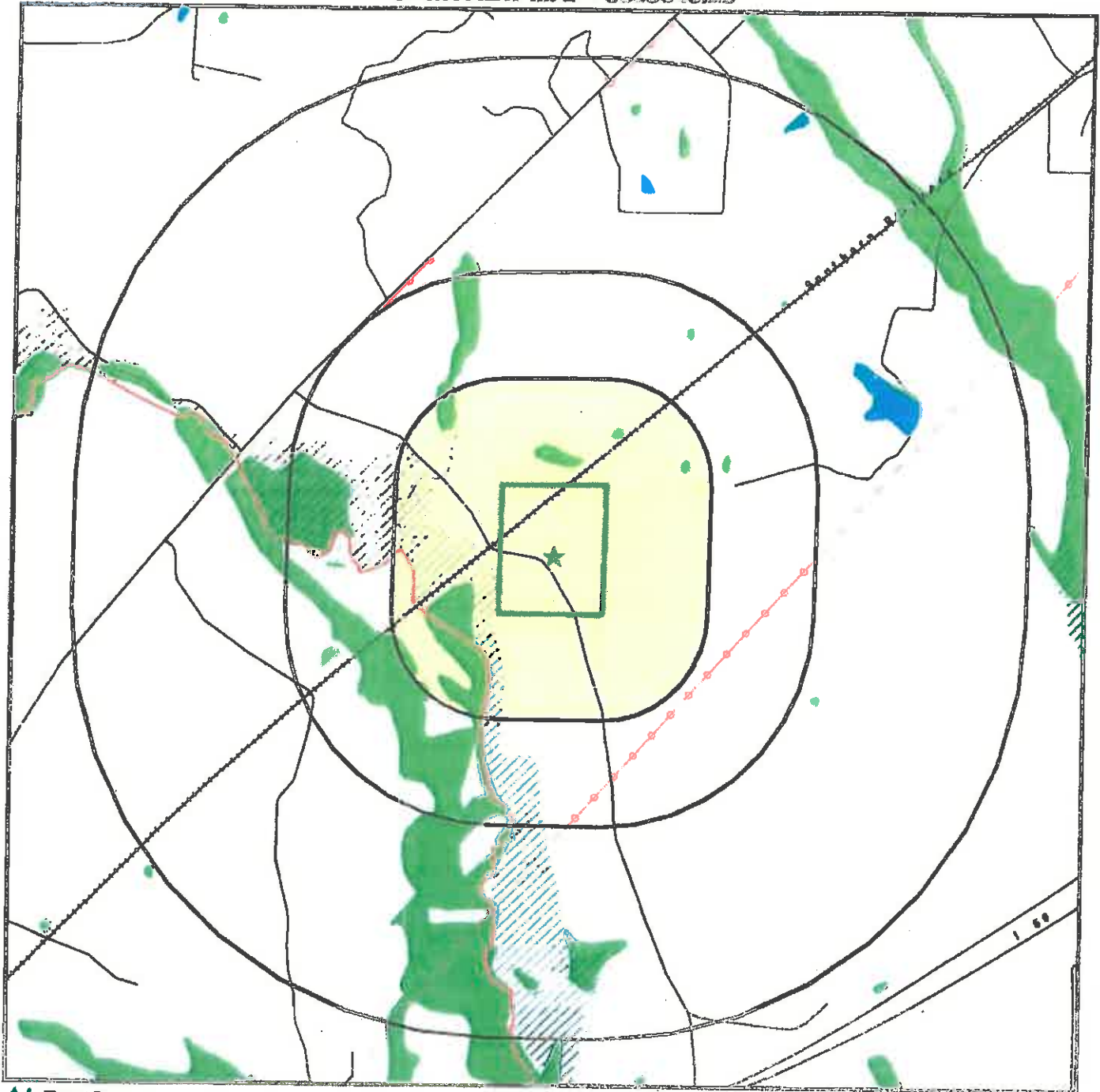
Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped. Count: 20 records.

<u>Site Name</u>	<u>Database(s)</u>
AUSTIN TRANSPORTATION	LUST, RGA LUST
MILLER'S GROCERY	UST, Financial Assurance
ROCK STORE (JET PEP # 303 NO TANKS	UST, AST, Financial Assurance
JET PEP #302 ATTALLA	UST, Financial Assurance
S&S KWIK STOP	UST, Financial Assurance
PAUL JORDAN CHEVRON	UST, Financial Assurance
SMILE EXPRESS #109	UST, Financial Assurance
ETOWAH CO DISTRICT #4 SHOP	UST, Financial Assurance
BURSON HWY 431 N SERVICE STATION	UST, Financial Assurance
77 MARKET TEXACO	UST, AST, Financial Assurance
MAVERIX SPEEDY SHOP	UST, Financial Assurance
MURPHY EXPRESS #8556	UST, Financial Assurance
AUSTIN TRANSPORTATION	UST, Financial Assurance
C&P TRUCKING	UST, Financial Assurance
MCCLENDON & BODHOLDT GROCERY	UST, Financial Assurance
STEELE SUPER VALUE	UST, Financial Assurance, RGA LUST
CLYDE MORROW GRO	UST, Financial Assurance
CF&G INC	RCRA NonGen / NLR, FINDS
COOSA VALEY STEEL	RCRA NonGen / NLR
MINK CREEK INVESTMENTS LLC	FINDS

OVERVIEW MAP - 3883546.2s



- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites

- 0 1/4 1/2 1 2 2.5 miles
- Indian Reservations BIA
- County Boundary
- Power transmission lines
- Oil & Gas pipelines from USGS
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory
- Area of Concern

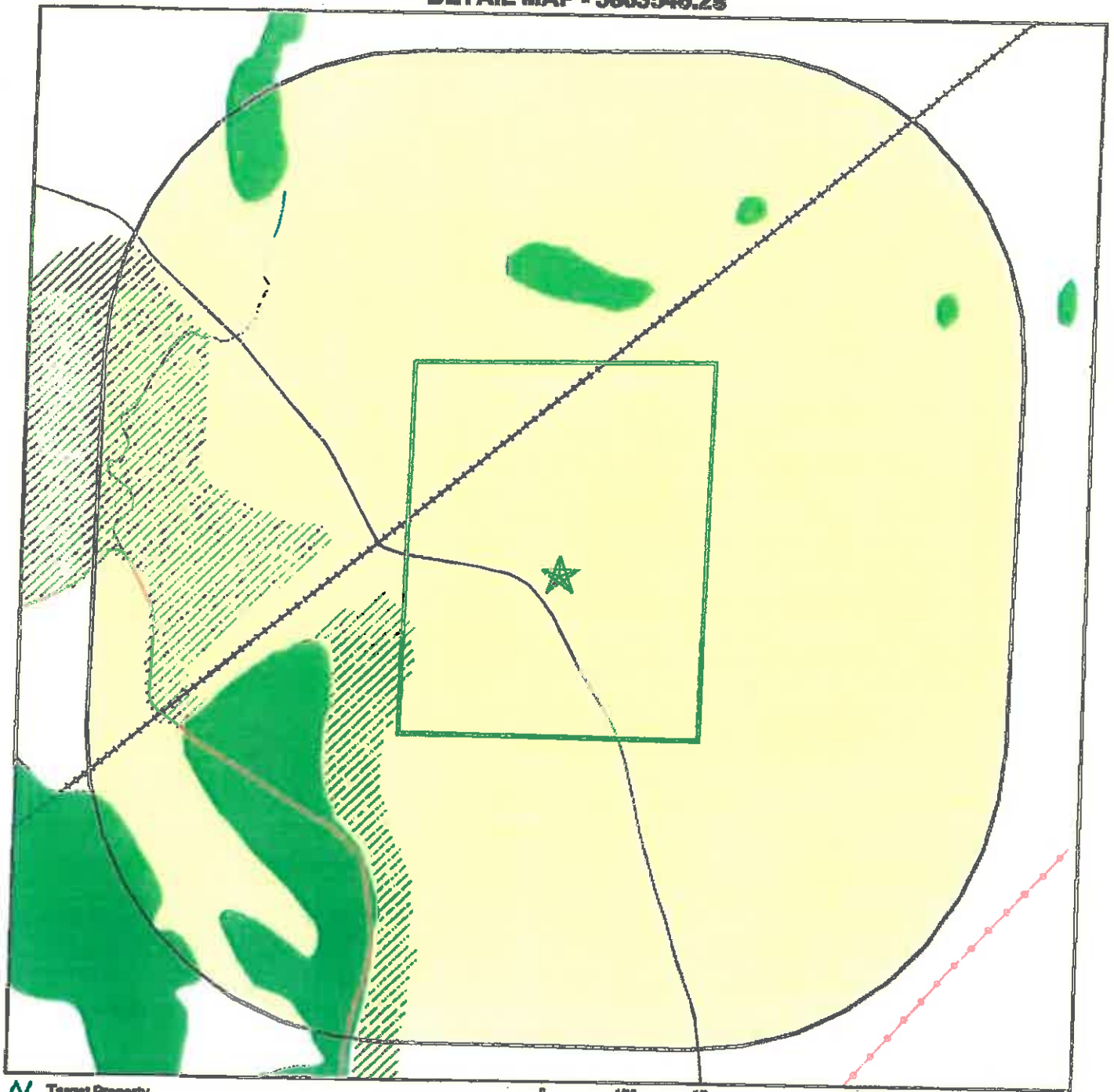
This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.








SITE NAME: Little Canoe Creek - 40 Acres
ADDRESS: 1280-1298 CANOE CREEK RD
 Atlanta AL 35954
LAT/LONG: 33.9659 / 86.1848




CLIENT: Goodwyn Mills & Cawood Envirn.
CONTACT: Stuart Blackwell
INQUIRY #: 3883546.2s
DATE: February 24, 2014 4:39 pm

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DETAIL MAP - 3863546.2s



-  Target Property
-  Sites at elevations higher than or equal to the target property
-  Sites at elevations lower than the target property
-  Manufactured Gas Plants
-  Sensitive Receptors
-  National Priority List Sites
-  Dept. Defense Sites

-  Indian Reservations BIA
-  County Boundary
-  Power transmission lines
-  Oil & Gas pipelines from USGS
-  100-year flood zone
-  500-year flood zone
-  National Wetland Inventory

 Area of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Little Canoe Creek - 40 Acres
ADDRESS: 1260-1280 CANOE CREEK RD
 Attala AL 35854
LAT/LONG: 33.9859 / 86.1648

CLIENT: Goodwyn Mills & Cawood Environ.
CONTACT: Stuart Blackwell
INQUIRY #: 3863546.2s
DATE: February 24, 2014 4:42 pm

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MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENTAL RECORDS								
Federal NPL site list								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	TP		NR	NR	NR	NR	NR	0
Federal Deleted NPL site list								
Deleted NPL	1.000		0	0	0	0	NR	0
Federal CERCLIS list								
CERCLIS	0.500		0	0	0	NR	NR	0
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
Federal CERCLIS NFRAP site List								
CERC-NFRAP	0.500		0	0	0	NR	NR	0
Federal RCRA CORRACTS facilities list								
CORRACTS	1.000		0	0	0	0	NR	0
Federal RCRA non-CORRACTS TSD facilities list								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
Federal RCRA generators list								
RCRA-LQG	0.250		0	0	NR	NR	NR	0
RCRA-SQG	0.250		0	0	NR	NR	NR	0
RCRA-CESQG	0.250		0	0	NR	NR	NR	0
Federal institutional controls / engineering controls registries								
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
LUCIS	0.500		0	0	0	NR	NR	0
Federal ERNS list								
ERNS	TP		NR	NR	NR	NR	NR	0
State- and tribal - equivalent CERCLIS								
SHWS	1.000		0	0	0	0	NR	0
State and tribal landfill and/or solid waste disposal site lists								
SWF/LF	0.500		0	0	0	NR	NR	0
State and tribal leaking storage tank lists								
LUST	0.500		0	0	0	NR	NR	0
LAST	0.500		0	0	0	NR	NR	0
INDIAN LUST	0.500		0	0	0	NR	NR	0
State and tribal registered storage tank lists								
UST	0.250		0	0	NR	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
AST	0.250		0	0	NR	NR	NR	0
INDIAN UST	0.250		0	0	NR	NR	NR	0
FEMA UST	0.250		0	0	NR	NR	NR	0
<i>State and tribal institutional control / engineering control registries</i>								
ENG CONTROLS	0.500		0	0	0	NR	NR	0
INST CONTROL	0.500		0	0	0	NR	NR	0
AUL	0.500		0	0	0	NR	NR	0
<i>State and tribal voluntary cleanup sites</i>								
INDIAN VCP	0.500		0	0	0	NR	NR	0
VCP	0.500		0	0	0	NR	NR	0
<i>State and tribal Brownfields sites</i>								
BROWNFIELDS	0.500		0	0	0	NR	NR	0
ADDITIONAL ENVIRONMENTAL RECORDS								
<i>Local Brownfield lists</i>								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
<i>Local Lists of Landfill / Solid Waste Disposal Sites</i>								
ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 8	0.500		0	0	0	NR	NR	0
SWRCY	0.500		0	0	0	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
<i>Local Lists of Hazardous waste / Contaminated Sites</i>								
US CDL	TP		NR	NR	NR	NR	NR	0
AOCONCERN	1.000		0	0	0	0	NR	0
CDL	TP		NR	NR	NR	NR	NR	0
US HIST CDL	TP		NR	NR	NR	NR	NR	0
<i>Local Land Records</i>								
LIENS 2	TP		NR	NR	NR	NR	NR	0
<i>Records of Emergency Release Reports</i>								
HMIRS	TP		NR	NR	NR	NR	NR	0
SPILLS	TP		NR	NR	NR	NR	NR	0
<i>Other Ascertainable Records</i>								
RCRA NonGen / NLR	0.250		0	0	NR	NR	NR	0
DOT OPS	TP		NR	NR	NR	NR	NR	0
DOD	1.000		0	0	0	0	NR	0
FUDS	1.000		0	0	0	0	NR	0
CONSENT	1.000		0	0	0	0	NR	0
ROD	1.000		0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
UMTRA	0.500		0	0	0	NR	NR	0
US MINES	0.250		0	0	NR	NR	NR	0
TRIS	TP		NR	NR	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0
FTTS	TP		NR	NR	NR	NR	NR	0
HIST FTTS	TP		NR	NR	NR	NR	NR	0
SSTS	TP		NR	NR	NR	NR	NR	0
ICIS	TP		NR	NR	NR	NR	NR	0
PADS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
RADINFO	TP		NR	NR	NR	NR	NR	0
FINDS	TP		NR	NR	NR	NR	NR	0
RAATS	TP		NR	NR	NR	NR	NR	0
RMP	TP		NR	NR	NR	NR	NR	0
UIC	TP		NR	NR	NR	NR	NR	0
NPDES	TP		NR	NR	NR	NR	NR	0
DRYCLEANERS	0.250		0	0	NR	NR	NR	0
TIER 2	TP		NR	NR	NR	NR	NR	0
INDIAN RESERV	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	0	NR	0
EPA WATCH LIST	TP		NR	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
LEAD SMELTERS	TP		NR	NR	NR	NR	NR	0
PCB TRANSFORMER	TP		NR	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
US FIN ASSUR	TP		NR	NR	NR	NR	NR	0
Financial Assurance	TP		NR	NR	NR	NR	NR	0
US AIRS	TP		NR	NR	NR	NR	NR	0
PRP	TP		NR	NR	NR	NR	NR	0
COAL ASH DOE	TP		NR	NR	NR	NR	NR	0
COAL ASH	0.500		0	0	0	NR	NR	0
<u>EDR HIGH RISK HISTORICAL RECORDS</u>								
<i>EDR Exclusive Records</i>								
EDR MGP	1.000		0	0	0	0	NR	0
EDR US Hist Auto Stat	0.250		0	0	NR	NR	NR	0
EDR US Hist Cleaners	0.250		0	0	NR	NR	NR	0
<u>EDR RECOVERED GOVERNMENT ARCHIVES</u>								
<i>Exclusive Recovered Govt. Archives</i>								
RGA LUST	TP		NR	NR	NR	NR	NR	0
RGA HWS	TP		NR	NR	NR	NR	NR	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Map ID
Direction
Distance
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number
EPA ID Number

NO SITES FOUND

Count: 20 records.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
ATTALLA	U003203804	MILLER'S GROCERY	RT 1 PO BOX 186		
ATTALLA	U004178152	ROCK STORE (JET PEP # 303 NO TANKS	1801 HWY 11 & HWY 77	35954	UST, Financial Assurance
ATTALLA	1000231895	CF&G INC	HWY 11 SOUTH	35954	UST, AST, Financial Assurance
ATTALLA	U001489278	JET PEP #302 ATTALLA	608 HWY 278 & CHERRY ST		RCRA NonGen / NLR, FINDS
ATTALLA	U004192986	S&S KWIK STOP	1525 SOUTH 3RD ST SW-HWY 11 &	35954	UST, Financial Assurance
ATTALLA	U000763199	PAUL JORDAN CHEVRON	722 SOUTH 3RD STREET (HWY 11)	35954	UST, Financial Assurance
ATTALLA	U004129934	SMILE EXPRESS #109	110 HWY 431 & 4TH STREET NW	35954	UST, Financial Assurance
ATTALLA	U001880880	ETOWAH CO DISTRICT #4 SHOP	1950 HWY 431 N	35954	UST, Financial Assurance
ATTALLA	U001718078	BURSON HWY 431 N SERVICE STATION	HWY 431 N	35954	UST, Financial Assurance
ATTALLA	1007090475	COOSA VALLEY STEEL	HIGHWAY 431 NORTH	35954	UST, Financial Assurance
ATTALLA	U004183074	77 MARKET TEXACO	630 HWY 77 AND COVINGTON AVE	35954	RCRA NonGen / NLR
ATTALLA	U004178245	MAVERIX SPEEDY SHOP	2876 HWY 77 & GALLANT ROAD	35954	UST, AST, Financial Assurance
ATTALLA	U004178220	MURPHY EXPRESS #8556	930 HWY 77	35954	UST, Financial Assurance
ATTALLA	U001864926	AUSTIN TRANSPORTATION	HWY 77 (1 RODNEY AUSTIN DRIVE)	35954	UST, Financial Assurance
ATTALLA	U000760870	C&P TRUCKING	HWY 77 N (N OF CLANTON ST)	35954	UST, Financial Assurance
ATTALLA	S103237502	AUSTIN TRANSPORTATION	#1 BILLY AUSTIN DRIVE / HWY 77	35954	UST, Financial Assurance
ETOWAH COUNTY	1014866678	MINK CREEK INVESTMENTS LLC	NEW RETAIL STORE 124 N 12TH ST		LUST, RGA LUST
STEELE	U003548853	MCLENDON & BODHOLDT GROCERY	HWY 11		FINDS
STEELE	U001489293	STEELE SUPER VALUE	HWY 11	35987	UST, Financial Assurance
STEELE	U001485880	CLYDE MORROW GRO	HWY 11	35987	UST, Financial Assurance, RGA LUST
				35987	UST, Financial Assurance

AS198 Phase I Environmental Study 2008-05-14

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provide confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 10/25/2013
Date Data Arrived at EDR: 11/11/2013
Date Made Active in Reports: 01/26/2014
Number of Days to Update: 78

Source: EPA
Telephone: N/A
Last EDR Contact: 01/21/2014
Next Scheduled EDR Contact: 04/21/2014
Data Release Frequency: Quarterly

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-818-1143

EPA Region 6
Telephone: 214-665-8659

EPA Region 3
Telephone 215-814-6418

EPA Region 7
Telephone: 813-551-7247

EPA Region 4
Telephone 404-682-9033

EPA Region 8
Telephone: 303-312-6774

EPA Region 5
Telephone 312-880-8886

EPA Region 9
Telephone: 415-947-4246

EPA Region 10
Telephone 206-553-8885

Proposed NPL: Proposed National Priority List Sites

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 10/25/2013
Date Data Arrived at EDR: 11/11/2013
Date Made Active in Reports: 01/26/2014
Number of Days to Update: 78

Source: EPA
Telephone: N/A
Last EDR Contact: 01/08/2014
Next Scheduled EDR Contact: 04/21/2014
Data Release Frequency: Quarterly

NPL LIENS: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991
Date Data Arrived at EDR: 02/02/1994
Date Made Active in Reports: 03/30/1994
Number of Days to Update: 56

Source: EPA
Telephone: 202-564-4267
Last EDR Contact: 08/15/2011
Next Scheduled EDR Contact: 11/28/2011
Data Release Frequency: No Update Planned

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Federal Delisted NPL site list

DELISTED NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 10/25/2013
Date Data Arrived at EDR: 11/11/2013
Date Made Active in Reports: 01/28/2014
Number of Days to Update: 78

Source: EPA
Telephone: N/A
Last EDR Contact: 01/09/2014
Next Scheduled EDR Contact: 04/21/2014
Data Release Frequency: Quarterly

Federal CERCLIS list

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 10/25/2013
Date Data Arrived at EDR: 11/11/2013
Date Made Active in Reports: 02/13/2014
Number of Days to Update: 94

Source: EPA
Telephone: 703-412-8810
Last EDR Contact: 11/11/2013
Next Scheduled EDR Contact: 03/10/2014
Data Release Frequency: Quarterly

FEDERAL FACILITY: Federal Facility Site Information listing

A listing of National Priority List (NPL) and Base Realignment and Closure (BRAC) sites found in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Database where EPA Federal Facilities Restoration and Reuse Office is involved in cleanup activities.

Date of Government Version: 05/31/2013
Date Data Arrived at EDR: 07/08/2013
Date Made Active in Reports: 12/06/2013
Number of Days to Update: 151

Source: Environmental Protection Agency
Telephone: 703-603-8704
Last EDR Contact: 01/10/2014
Next Scheduled EDR Contact: 04/21/2014
Data Release Frequency: Varies

Federal CERCLIS NFRAP site List

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Date of Government Version: 10/25/2013
Date Data Arrived at EDR: 11/11/2013
Date Made Active in Reports: 02/13/2014
Number of Days to Update: 84

Source: EPA
Telephone: 703-412-8810
Last EDR Contact: 11/11/2013
Next Scheduled EDR Contact: 03/10/2014
Data Release Frequency: Quarterly

Federal RCRA CORRACTS facilities list

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/10/2013
Date Data Arrived at EDR: 10/02/2013
Date Made Active in Reports: 12/16/2013
Number of Days to Update: 75

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 01/02/2014
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF: RCRA - Treatment, Storage and Disposal

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSD/Fe treat, store, or dispose of the waste.

Date of Government Version: 09/10/2013
Date Data Arrived at EDR: 10/02/2013
Date Made Active in Reports: 12/16/2013
Number of Days to Update: 75

Source: Environmental Protection Agency
Telephone: (404) 562-9851
Last EDR Contact: 01/02/2014
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

Federal RCRA generators list

RCRA-LQG: RCRA - Large Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 09/10/2013
Date Data Arrived at EDR: 10/02/2013
Date Made Active in Reports: 12/16/2013
Number of Days to Update: 75

Source: Environmental Protection Agency
Telephone: (404) 562-9851
Last EDR Contact: 01/02/2014
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

RCRA-SQG: RCRA - Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 09/10/2013
Date Data Arrived at EDR: 10/02/2013
Date Made Active in Reports: 12/16/2013
Number of Days to Update: 75

Source: Environmental Protection Agency
Telephone: (404) 562-9851
Last EDR Contact: 01/02/2014
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

RCRA-CESQG: RCRA - Conditionally Exempt Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 09/10/2013
Date Data Arrived at EDR: 10/02/2013
Date Made Active in Reports: 12/16/2013
Number of Days to Update: 75

Source: Environmental Protection Agency
Telephone: (404) 562-9851
Last EDR Contact: 01/02/2014
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Federal institutional controls / engineering controls registries

LUCIS: Land Use Control Information System

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 11/20/2013
Date Data Arrived at EDR: 11/21/2013
Date Made Active in Reports: 02/24/2014
Number of Days to Update: 95

Source: Department of the Navy
Telephone: 843-820-7326
Last EDR Contact: 02/14/2014
Next Scheduled EDR Contact: 06/02/2014
Data Release Frequency: Varies

Federal ERNS list

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 09/30/2013
Date Data Arrived at EDR: 10/01/2013
Date Made Active in Reports: 12/06/2013
Number of Days to Update: 66

Source: National Response Center, United States Coast Guard
Telephone: 202-267-2180
Last EDR Contact: 02/07/2014
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Annually

State- and tribal - equivalent CERCLIS

SHWS: Hazardous Substance Cleanup Fund

Hazardous substance sites, which pose a threat to public health and the environment, which will be cleaned up utilizing the Hazardous Substance Cleanup Fund.

Date of Government Version: 12/28/2013
Date Data Arrived at EDR: 01/02/2014
Date Made Active in Reports: 02/10/2014
Number of Days to Update: 39

Source: Department of Environmental Management
Telephone: 334-271-7984
Last EDR Contact: 12/12/2013
Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Semi-Annually

HWS DETAIL: Alabama Hazardous Substance Cleanup Fund Annual Report

The Alabama Hazardous Substance Cleanup Fund (AHSCF) was established in 1989 by act of the Alabama Legislature (Code of Alabama 1975, §22-30A) to provide a mechanism for ADEM to investigate, remediate, and monitor hazardous substance sites. These sites may potentially endanger human health and the environment, but may not qualify to be addressed by other federal or state cleanup programs.

Date of Government Version: 12/31/2012
Date Data Arrived at EDR: 01/25/2013
Date Made Active in Reports: 03/05/2013
Number of Days to Update: 39

Source: Department of Environmental Management
Telephone: 334-271-7730
Last EDR Contact: 12/12/2013
Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Annually

State and tribal landfill and/or solid waste disposal site lists

SWF/LF: Permitted Landfills

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 06/28/2011
Date Data Arrived at EDR: 10/25/2011
Date Made Active in Reports: 11/09/2011
Number of Days to Update: 15

Source: Department of Environmental Management
Telephone: 334-271-7730
Source: Department of Environmental Management, GIS Section
Telephone: 334-271-7700
Last EDR Contact: 01/17/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

State and tribal leaking storage tank lists

LUST: Leaking Underground Storage Tank Listing

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 12/03/2013
Date Data Arrived at EDR: 12/31/2013
Date Made Active in Reports: 02/10/2014
Number of Days to Update: 41

Source: Department of Environmental Management
Telephone: 334-270-5855
Last EDR Contact: 12/31/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

LAST: List of AST Release Incidents

A listing of aboveground storage tank releases that have been reported to ADEM. These are primarily smaller retail ASTs and smaller bulk plant ASTs.

Date of Government Version: 01/03/2014
Date Data Arrived at EDR: 01/09/2014
Date Made Active in Reports: 02/10/2014
Number of Days to Update: 32

Source: Department of Environmental Management
Telephone: 334-271-7712
Last EDR Contact: 12/30/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Varies

INDIAN LUST R4: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Florida, Mississippi and North Carolina.

Date of Government Version: 11/21/2013
Date Data Arrived at EDR: 11/26/2013
Date Made Active in Reports: 02/24/2014
Number of Days to Update: 90

Source: EPA Region 4
Telephone: 404-592-9877
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Semi-Annually

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 08/27/2012
Date Data Arrived at EDR: 08/28/2012
Date Made Active in Reports: 10/16/2012
Number of Days to Update: 48

Source: EPA Region 8
Telephone: 303-312-8271
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Quarterly

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 03/01/2013
Date Data Arrived at EDR: 03/01/2013
Date Made Active in Reports: 04/12/2013
Number of Days to Update: 42

Source: Environmental Protection Agency
Telephone: 415-972-3372
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Quarterly

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land

Leaking underground storage tanks located on Indian Land in Michigan, Minnesota and Wisconsin.

Date of Government Version: 02/13/2014
Date Data Arrived at EDR: 02/14/2014
Date Made Active in Reports: 02/24/2014
Number of Days to Update: 10

Source: EPA Region 5
Telephone: 312-868-7439
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land

A listing of leaking underground storage tank locations on Indian Land.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 02/01/2013
Date Data Arrived at EDR: 05/01/2013
Date Made Active in Reports: 11/01/2013
Number of Days to Update: 184

Source: EPA Region 1
Telephone: 817-918-1313
Last EDR Contact: 01/30/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 08/12/2011
Date Data Arrived at EDR: 08/13/2011
Date Made Active in Reports: 11/11/2011
Number of Days to Update: 59

Source: EPA Region 6
Telephone: 214-665-8597
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 08/27/2013
Date Data Arrived at EDR: 08/27/2013
Date Made Active in Reports: 11/01/2013
Number of Days to Update: 68

Source: EPA Region 7
Telephone: 913-551-7003
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 11/08/2013
Date Data Arrived at EDR: 11/07/2013
Date Made Active in Reports: 12/08/2013
Number of Days to Update: 29

Source: EPA Region 10
Telephone: 208-553-2857
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Quarterly

State and tribal registered storage tank lists

UST: Underground Storage Tank Information

Registered Underground Storage Tanks. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 11/25/2013
Date Data Arrived at EDR: 12/31/2013
Date Made Active in Reports: 01/27/2014
Number of Days to Update: 27

Source: Department of Environmental Management
Telephone: 334-270-5855
Last EDR Contact: 12/31/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

AST: Aboveground Storage Tank Sites
Aboveground storage tank locations.

Date of Government Version: 11/25/2013
Date Data Arrived at EDR: 12/31/2013
Date Made Active in Reports: 01/27/2014
Number of Days to Update: 27

Source: Department of Environmental Management
Telephone: 334-271-7926
Last EDR Contact: 12/31/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

INDIAN UST R7: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 7 (Iowa, Kansas, Missouri, Nebraska, and 9 Tribal Nations).

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/31/2012
Date Data Arrived at EDR: 02/28/2013
Date Made Active in Reports: 04/12/2013
Number of Days to Update: 43

Source: EPA Region 7
Telephone: 913-651-7003
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

INDIAN UST R6: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 6 (Louisiana, Arkansas, Oklahoma, New Mexico, Texas and 85 Tribes).

Date of Government Version: 05/10/2011
Date Data Arrived at EDR: 05/11/2011
Date Made Active in Reports: 06/14/2011
Number of Days to Update: 34

Source: EPA Region 6
Telephone: 214-886-7501
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Semi-Annually

INDIAN UST R5: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 5 (Michigan, Minnesota and Wisconsin and Tribal Nations).

Date of Government Version: 02/13/2014
Date Data Arrived at EDR: 02/14/2014
Date Made Active in Reports: 02/24/2014
Number of Days to Update: 10

Source: EPA Region 5
Telephone: 312-886-6138
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

INDIAN UST R4: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 4 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee and Tribal Nations).

Date of Government Version: 11/21/2013
Date Data Arrived at EDR: 11/26/2013
Date Made Active in Reports: 02/24/2014
Number of Days to Update: 90

Source: EPA Region 4
Telephone: 404-562-8424
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Semi-Annually

INDIAN UST R1: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 1 (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont and ten Tribal Nations).

Date of Government Version: 02/01/2013
Date Data Arrived at EDR: 05/01/2013
Date Made Active in Reports: 01/27/2014
Number of Days to Update: 271

Source: EPA, Region 1
Telephone: 617-918-1313
Last EDR Contact: 01/30/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

INDIAN UST R8: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming and 27 Tribal Nations).

Date of Government Version: 07/29/2013
Date Data Arrived at EDR: 08/01/2013
Date Made Active in Reports: 11/01/2013
Number of Days to Update: 82

Source: EPA Region 8
Telephone: 303-312-6137
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Quarterly

INDIAN UST R10: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 10 (Alaska, Idaho, Oregon, Washington, and Tribal Nations).

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 02/05/2013
Date Data Arrived at EDR: 02/06/2013
Date Made Active in Reports: 04/12/2013
Number of Days to Update: 65

Source: EPA Region 10
Telephone: 208-563-2857
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Quarterly

INDIAN UST R9: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 9 (Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations).

Date of Government Version: 07/29/2013
Date Data Arrived at EDR: 07/30/2013
Date Made Active in Reports: 12/08/2013
Number of Days to Update: 129

Source: EPA Region 9
Telephone: 415-872-3388
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Quarterly

FEMA UST: Underground Storage Tank Listing

A listing of all FEMA owned underground storage tanks.

Date of Government Version: 01/01/2010
Date Data Arrived at EDR: 02/16/2010
Date Made Active in Reports: 04/12/2010
Number of Days to Update: 65

Source: FEMA
Telephone: 202-848-5797
Last EDR Contact: 01/13/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Varies

State and tribal institutional control / engineering control registries

ENG CONTROLS: Engineering Controls Site Listing

A listing of sites with engineering controls included in the Land Division Cleanup Program Inventory listing.

Date of Government Version: 08/24/2009
Date Data Arrived at EDR: 08/26/2009
Date Made Active in Reports: 09/11/2009
Number of Days to Update: 16

Source: Department of Environmental Management
Telephone: 334-271-7735
Last EDR Contact: 12/12/2013
Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Varies

INST CONTROL: Land Division Brownfields 128(a) Program Site Listing

Institutional Controls (ICs) are non-engineered instruments, such as administrative and/or legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of a remedy by limiting land or resource use. There are five different types of controls. These are governmental, proprietary, enforcement tools with IC components, informational devices and unrestricted. Unrestricted- No institutional controls (unrestricted for industrial and residential use). Governmental- controls implemented and enforced by state and local governments (zoning restrictions, ordinances, building permits, etc.). Proprietary- controls which have their basis in real property law (easements, covenants). Enforcement and Permit Tools with IC components- these controls are issued to compel land owners to limit certain site activities on both federal and private sites. Informational devices- informational tools which provide information or notification that residual or capped contamination may remain on site (deed or hazard notices).

Date of Government Version: 08/24/2009
Date Data Arrived at EDR: 08/26/2009
Date Made Active in Reports: 09/11/2009
Number of Days to Update: 16

Source: Department of Environmental Management
Telephone: 334-271-7735
Last EDR Contact: 08/17/2012
Next Scheduled EDR Contact: 10/01/2012
Data Release Frequency: Varies

AUL: Environmental Covenants

An environmental covenant is required for a site if the approved environmental response project plan places a land use control on the site because it is not being remediated to unrestricted use.

Date of Government Version: 12/09/2013
Date Data Arrived at EDR: 01/03/2014
Date Made Active in Reports: 02/10/2014
Number of Days to Update: 38

Source: Department of Environmental Management
Telephone: 334-279-3053
Last EDR Contact: 12/12/2013
Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

State and tribal voluntary cleanup sites

INDIAN VCP R1: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 1.

Date of Government Version: 09/17/2013 Source: EPA, Region 1
Date Data Arrived at EDR: 10/01/2013 Telephone: 617-918-1102
Date Made Active in Reports: 12/06/2013 Last EDR Contact: 01/03/2014
Number of Days to Update: 68 Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Varies

VCP: Cleanup Program Inventory

Currently the Cleanup Inventory List contains information about sites undergoing assessment and possible cleanup under Alabama's Brownfield Redevelopment and Voluntary Cleanup Program. It also includes sites that have exited the program but were remediated to less than unremediated levels.

Date of Government Version: 01/03/2014 Source: Department of Environmental Management
Date Data Arrived at EDR: 01/03/2014 Telephone: 334-271-7700
Date Made Active in Reports: 02/10/2014 Last EDR Contact: 12/12/2013
Number of Days to Update: 38 Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Semi-Annually

INDIAN VCP R7: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 7.

Date of Government Version: 03/20/2008 Source: EPA, Region 7
Date Data Arrived at EDR: 04/22/2008 Telephone: 913-551-7365
Date Made Active in Reports: 05/19/2008 Last EDR Contact: 04/20/2009
Number of Days to Update: 27 Next Scheduled EDR Contact: 07/20/2009
Data Release Frequency: Varies

State and tribal Brownfields sites

BROWNFIELDS: Land Division Brownfields 128(a) Program Site Listing

A listing of Brownfields activities performed by ADEM.

Date of Government Version: 01/03/2014 Source: Department of Environmental Management
Date Data Arrived at EDR: 01/03/2014 Telephone: 334-271-7735
Date Made Active in Reports: 02/10/2014 Last EDR Contact: 12/12/2013
Number of Days to Update: 38 Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Varies

BROWNFIELDS 2: Directory of Brownfields Sites

The directory provides a brief look at sites being marketed as brownfields.

Date of Government Version: 04/01/2011 Source: Department of Environmental Management
Date Data Arrived at EDR: 06/16/2011 Telephone: 334-271-7735
Date Made Active in Reports: 07/28/2011 Last EDR Contact: 12/20/2013
Number of Days to Update: 40 Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Varies

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS: A Listing of Brownfields Sites

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reusing in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. Assessment, Cleanup and Redevelopment Exchange System (ACRES) stores information reported by EPA Brownfields grant recipients on brownfields properties assessed or cleaned up with grant funding as well as information on targeted Brownfields Assessments performed by EPA Regions. A listing of ACRES Brownfield sites is obtained from Clearance in My Community. Clearance in My Community provides information on Brownfield properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/24/2013
Date Data Arrived at EDR: 09/24/2013
Date Made Active in Reports: 12/06/2013
Number of Days to Update: 73

Source: Environmental Protection Agency
Telephone: 202-566-2777
Last EDR Contact: 12/24/2013
Next Scheduled EDR Contact: 04/07/2014
Data Release Frequency: Semi-Annually

Local Lists of Landfill / Solid Waste Disposal Sites

ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 08/30/1985
Date Data Arrived at EDR: 08/09/2004
Date Made Active in Reports: 09/17/2004
Number of Days to Update: 39

Source: Environmental Protection Agency
Telephone: 800-424-9348
Last EDR Contact: 08/09/2004
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

DEBRIS REGION 9: Torres Martinez Reservation Illegal Dump Site Locations

A listing of illegal dump sites location on the Torres Martinez Indian Reservation located in eastern Riverside County and northern Imperial County, California.

Date of Government Version: 01/12/2009
Date Data Arrived at EDR: 05/07/2009
Date Made Active in Reports: 09/21/2009
Number of Days to Update: 137

Source: EPA, Region 9
Telephone: 415-847-4218
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: No Update Planned

SWRCY: Recycling/Recovered Materials Processors Directory

A listing of recycling facilities.

Date of Government Version: 09/01/2009
Date Data Arrived at EDR: 01/22/2010
Date Made Active in Reports: 02/05/2010
Number of Days to Update: 14

Source: Department of Economic & Community Affairs
Telephone: 334-242-5336
Last EDR Contact: 01/13/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Varies

INDIAN ODI: Report on the Status of Open Dumps on Indian Lands

Location of open dumps on Indian land.

Date of Government Version: 12/31/1998
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 52

Source: Environmental Protection Agency
Telephone: 703-308-8245
Last EDR Contact: 11/04/2013
Next Scheduled EDR Contact: 02/17/2014
Data Release Frequency: Varies

Local Lists of Hazardous waste / Contaminated Sites

US CDL: Clandestine Drug Labs

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 12/04/2013
Date Data Arrived at EDR: 12/10/2013
Date Made Active in Reports: 02/13/2014
Number of Days to Update: 65

Source: Drug Enforcement Administration
Telephone: 202-307-1000
Last EDR Contact: 12/05/2013
Next Scheduled EDR Contact: 03/17/2014
Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

AOC/CONCERN: Area of Concern

Property boundary of the Redstone Arsenal facility.

Date of Government Version: 09/01/2008
Date Data Arrived at EDR: 08/24/2008
Date Made Active in Reports: 10/23/2009
Number of Days to Update: 394

Source: Department of the Army
Telephone: 268-913-3255
Last EDR Contact: 11/04/2013
Next Scheduled EDR Contact: 02/17/2014
Data Release Frequency: No Update Planned

CDL: Chloroquine Methamphetamine Lab Sites

Chloroquine methamphetamine lab locations seized by law enforcement agencies.

Date of Government Version: 12/09/2010
Date Data Arrived at EDR: 02/08/2011
Date Made Active in Reports: 02/28/2011
Number of Days to Update: 20

Source: Department of Environmental Management,
Telephone: 334-271-7700
Last EDR Contact: 07/31/2013
Next Scheduled EDR Contact: 11/18/2013
Data Release Frequency: Varies

US HIST CDL: National Chloroquine Laboratory Register

A listing of chloroquine drug lab locations. The U.S. Department of Justice (The Department) provides this web site as a public service. It correlates addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either chloroquine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee the accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 09/01/2007
Date Data Arrived at EDR: 11/19/2008
Date Made Active in Reports: 03/20/2009
Number of Days to Update: 131

Source: Drug Enforcement Administration
Telephone: 202-307-1080
Last EDR Contact: 03/23/2009
Next Scheduled EDR Contact: 08/22/2009
Data Release Frequency: No Update Planned

Local Land Records

LIENS 2: CERCLA Lien Information

A Federal CERCLA (Superfund) lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Date of Government Version: 02/06/2013
Date Data Arrived at EDR: 04/25/2013
Date Made Active in Reports: 05/10/2013
Number of Days to Update: 15

Source: Environmental Protection Agency
Telephone: 202-584-8023
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

Records of Emergency Release Reports

HMIRS: Hazardous Materials Information Reporting System

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 12/31/2013
Date Data Arrived at EDR: 01/03/2014
Date Made Active in Reports: 02/24/2014
Number of Days to Update: 62

Source: U.S. Department of Transportation
Telephone: 202-388-4555
Last EDR Contact: 01/03/2014
Next Scheduled EDR Contact: 01/13/2014
Data Release Frequency: Annually

SPILLS: Emergency Response Data

Incidents involving spills of oil and hazardous materials.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 01/07/2014
Date Data Arrived at EDR: 01/08/2014
Date Made Active in Reports: 02/10/2014
Number of Days to Update: 32

Source: Department of Environmental Management
Telephone: 334-384-4382
Last EDR Contact: 12/30/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Varies

Other Ascertainable Records

RCRA NonGen / NLR: RCRA - Non Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 09/10/2013
Date Data Arrived at EDR: 10/02/2013
Date Made Active in Reports: 12/16/2013
Number of Days to Update: 75

Source: Environmental Protection Agency
Telephone: (404) 562-8651
Last EDR Contact: 01/02/2014
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Varies

DOT OPS: Incident and Accident Data

Department of Transportation, Office of Pipeline Safety Incident and Accident data.

Date of Government Version: 07/31/2012
Date Data Arrived at EDR: 08/07/2012
Date Made Active in Reports: 09/18/2012
Number of Days to Update: 42

Source: Department of Transportation, Office of Pipeline Safety
Telephone: 202-368-4595
Last EDR Contact: 02/08/2014
Next Scheduled EDR Contact: 05/18/2014
Data Release Frequency: Varies

DOD: Department of Defense Sites

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 11/10/2006
Date Made Active in Reports: 01/11/2007
Number of Days to Update: 62

Source: USGS
Telephone: 888-275-8747
Last EDR Contact: 01/15/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Semi-Annually

FUDS: Formerly Used Defense Sites

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/31/2011
Date Data Arrived at EDR: 02/26/2013
Date Made Active in Reports: 03/13/2013
Number of Days to Update: 15

Source: U.S. Army Corps of Engineers
Telephone: 202-528-4285
Last EDR Contact: 12/13/2013
Next Scheduled EDR Contact: 03/24/2014
Data Release Frequency: Varies

CONSENT: Superfund (CERCLA) Consent Decrees

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 12/31/2013
Date Data Arrived at EDR: 01/24/2014
Date Made Active in Reports: 02/24/2014
Number of Days to Update: 31

Source: Department of Justice, Consent Decree Library
Telephone: Varies
Last EDR Contact: 12/26/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

ROD: Records Of Decision

Record of Decision, ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 11/25/2013
Date Data Arrived at EDR: 12/12/2013
Date Made Active In Reports: 02/24/2014
Number of Days to Update: 74

Source: EPA
Telephone: 703-418-0223
Last EDR Contact: 12/12/2013
Next Scheduled EDR Contact: 03/24/2014
Data Release Frequency: Annually

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 09/14/2010
Date Data Arrived at EDR: 10/07/2011
Date Made Active In Reports: 03/01/2012
Number of Days to Update: 146

Source: Department of Energy
Telephone: 805-845-0011
Last EDR Contact: 11/20/2013
Next Scheduled EDR Contact: 03/10/2014
Data Release Frequency: Varies

US MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 08/01/2013
Date Data Arrived at EDR: 09/05/2013
Date Made Active In Reports: 10/03/2013
Number of Days to Update: 28

Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-6888
Last EDR Contact: 12/06/2013
Next Scheduled EDR Contact: 03/17/2014
Data Release Frequency: Semi-Annually

TRIS: Toxic Chemical Release Inventory System

Toxic Releasees Inventory System, TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2011
Date Data Arrived at EDR: 07/31/2013
Date Made Active In Reports: 08/13/2013
Number of Days to Update: 44

Source: EPA
Telephone: 202-568-0250
Last EDR Contact: 11/27/2013
Next Scheduled EDR Contact: 03/10/2014
Data Release Frequency: Annually

TSCA: Toxic Substances Control Act

Toxic Substances Control Act, TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substances Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2006
Date Data Arrived at EDR: 08/28/2010
Date Made Active In Reports: 12/02/2010
Number of Days to Update: 64

Source: EPA
Telephone: 202-260-5521
Last EDR Contact: 12/28/2013
Next Scheduled EDR Contact: 04/07/2014
Data Release Frequency: Every 4 Years

FTTS: FIFRA/TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/09/2009
Date Data Arrived at EDR: 04/18/2009
Date Made Active In Reports: 05/11/2009
Number of Days to Update: 25

Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-568-1687
Last EDR Contact: 02/24/2014
Next Scheduled EDR Contact: 06/03/2014
Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

FTTS INSP: FIFRA/TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act) A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 04/09/2009
Data Data Arrived at EDR: 04/16/2009
Date Made Active in Reports: 05/11/2009
Number of Days to Update: 25

Source: EPA
Telephone: 202-566-1667
Last EDR Contact: 02/24/2014
Next Scheduled EDR Contact: 06/09/2014
Data Release Frequency: Quarterly

HIST FTTS: FIFRA/TSCA Tracking System Administrative Case Listing

A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2007
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

HIST FTTS INSP: FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing

A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2008
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2009
Date Data Arrived at EDR: 12/10/2010
Date Made Active in Reports: 02/25/2011
Number of Days to Update: 77

Source: EPA
Telephone: 202-564-4203
Last EDR Contact: 01/28/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Annually

ICIS: Integrated Compliance Information System

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 07/20/2011
Date Data Arrived at EDR: 11/10/2011
Date Made Active in Reports: 01/10/2012
Number of Days to Update: 61

Source: Environmental Protection Agency
Telephone: 202-564-5088
Last EDR Contact: 10/09/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

PADS: PCB Activity Database System

PCB Activity Database. PADS identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 06/01/2013
Date Data Arrived at EDR: 07/17/2013
Date Made Active in Reports: 11/01/2013
Number of Days to Update: 107

Source: EPA
Telephone: 202-568-0500
Last EDR Contact: 01/28/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Annually

MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 07/22/2013
Date Data Arrived at EDR: 08/02/2013
Date Made Active in Reports: 11/01/2013
Number of Days to Update: 91

Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
Last EDR Contact: 12/09/2013
Next Scheduled EDR Contact: 03/24/2014
Data Release Frequency: Quarterly

RADINFO: Radiation Information Database

The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 09/30/2013
Date Data Arrived at EDR: 10/09/2013
Date Made Active in Reports: 11/01/2013
Number of Days to Update: 23

Source: Environmental Protection Agency
Telephone: 202-343-9775
Last EDR Contact: 01/10/2014
Next Scheduled EDR Contact: 04/21/2014
Data Release Frequency: Quarterly

FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 03/08/2013
Date Data Arrived at EDR: 03/21/2013
Date Made Active in Reports: 07/10/2013
Number of Days to Update: 111

Source: EPA
Telephone: (404) 582-9900
Last EDR Contact: 12/10/2013
Next Scheduled EDR Contact: 03/24/2014
Data Release Frequency: Quarterly

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995
Date Data Arrived at EDR: 07/03/1995
Date Made Active in Reports: 08/07/1995
Number of Days to Update: 35

Source: EPA
Telephone: 202-564-4104
Last EDR Contact: 08/02/2008
Next Scheduled EDR Contact: 09/01/2008
Data Release Frequency: No Update Planned

RMP: Risk Management Plans

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g. the fire department) should an accident occur.

Date of Government Version: 11/01/2013
Date Data Arrived at EDR: 12/12/2013
Date Made Active in Reports: 02/13/2014
Number of Days to Update: 63

Source: Environmental Protection Agency
Telephone: 202-564-8600
Last EDR Contact: 01/27/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2011
Date Data Arrived at EDR: 02/26/2013
Date Made Active in Reports: 04/19/2013
Number of Days to Update: 52

Source: EPA/NTIS
Telephone: 800-424-8348
Last EDR Contact: 11/25/2013
Next Scheduled EDR Contact: 03/10/2014
Data Release Frequency: Biennially

UIC: UIC Listing

A listing of underground injection control wells.

Date of Government Version: 08/08/2013
Date Data Arrived at EDR: 08/14/2013
Date Made Active in Reports: 08/16/2013
Number of Days to Update: 2

Source: Geological Survey of Alabama
Telephone: 205-247-3661
Last EDR Contact: 02/14/2014
Next Scheduled EDR Contact: 05/26/2014
Data Release Frequency: Quarterly

NPDES: NPDES Permit Listing

A listing of municipal and industrial permits issued by the Department of Environmental Management.

Date of Government Version: 04/05/2012
Date Data Arrived at EDR: 04/08/2012
Date Made Active in Reports: 04/25/2012
Number of Days to Update: 19

Source: Department of Environmental Management
Telephone: 334-271-7712
Last EDR Contact: 12/30/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Varies

DRYCLEANERS: Drycleaner Facility Listing

A listing of drycleaner sites in the voluntary DERTF.

Date of Government Version: 11/25/2013
Date Data Arrived at EDR: 11/26/2013
Date Made Active in Reports: 12/26/2013
Number of Days to Update: 30

Source: Department of Environmental Management
Telephone: 334-271-7703
Last EDR Contact: 02/14/2014
Next Scheduled EDR Contact: 06/02/2014
Data Release Frequency: Varies

TIER 2: Tier 2 Data Listing

A listing of facilities which store or manufacture hazardous materials and submit a chemical inventory report.

Date of Government Version: 12/31/2012
Date Data Arrived at EDR: 06/17/2013
Date Made Active in Reports: 07/29/2013
Number of Days to Update: 42

Source: Department of Environmental Management
Telephone: 334-280-2714
Last EDR Contact: 12/11/2013
Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 12/09/2006
Date Made Active In Reports: 01/11/2007
Number of Days to Update: 34

Source: USGS
Telephone: 202-208-9710
Last EDR Contact: 01/15/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Semi-Annually

SOGD DRYCLEANERS: State Coalition for Remediation of Drycleaners Lining

The State Coalition for Remediation of Drycleaners was established in 1988, with support from the U.S. EPA Office of Superfund Remediation and Technology Innovation. It is comprised of representatives of states with established drycleaner remediation programs. Currently the member states are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin.

Date of Government Version: 03/07/2011
Date Data Arrived at EDR: 03/09/2011
Date Made Active In Reports: 05/02/2011
Number of Days to Update: 54

Source: Environmental Protection Agency
Telephone: 815-632-8699
Last EDR Contact: 01/20/2014
Next Scheduled EDR Contact: 05/05/2014
Data Release Frequency: Varies

FEDLAND: Federal and Indian Lands

Federally and Indian administered lands of the United States. Lands included are administered by: Army Corps of Engineers, Bureau of Reclamation, National Wild and Scenic River, National Wildlife Refuge, Public Domain Land, Wilderness, Wilderness Study Area, Wildlife Management Area, Bureau of Indian Affairs, Bureau of Land Management, Department of Justice, Forest Service, Fish and Wildlife Service, National Park Service.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 02/06/2006
Date Made Active In Reports: 01/11/2007
Number of Days to Update: 339

Source: U.S. Geological Survey
Telephone: 888-275-8747
Last EDR Contact: 01/15/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: N/A

PRP: Potentially Responsible Parties

A listing of verified Potentially Responsible Parties

Date of Government Version: 04/15/2013
Date Data Arrived at EDR: 07/03/2013
Date Made Active In Reports: 09/13/2013
Number of Days to Update: 72

Source: EPA
Telephone: 202-564-8023
Last EDR Contact: 01/02/2014
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

LEAD SMELTER 2: Lead Smelter Sites

A list of several hundred sites in the U.S. where secondary lead smelting was done from 1831 and 1964. These sites may pose a threat to public health through ingestion or inhalation of contaminated soil or dust

Date of Government Version: 04/05/2001
Date Data Arrived at EDR: 10/27/2010
Date Made Active In Reports: 12/02/2010
Number of Days to Update: 36

Source: American Journal of Public Health
Telephone: 703-905-9461
Last EDR Contact: 12/02/2009
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

LEAD SMELTER 1: Lead Smelter Sites

A listing of former lead smelter site locations.

Date of Government Version: 01/29/2013
Date Data Arrived at EDR: 02/14/2013
Date Made Active In Reports: 02/27/2013
Number of Days to Update: 13

Source: Environmental Protection Agency
Telephone: 703-609-8787
Last EDR Contact: 01/03/2014
Next Scheduled EDR Contact: 04/21/2014
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

EPA WATCH LIST: EPA WATCH LIST

EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

Date of Government Version: 08/30/2013
Date Data Arrived at EDR: 08/13/2013
Date Made Active in Reports: 08/13/2013
Number of Days to Update: 31

Source: Environmental Protection Agency
Telephone: 617-520-3000
Last EDR Contact: 02/10/2014
Next Scheduled EDR Contact: 05/26/2014
Data Release Frequency: Quarterly

2020 COR ACTION: 2020 Corrective Action Program List

The EPA has set ambitious goals for the RCRA Corrective Action program by creating the 2020 Corrective Action Universe. This RCRA cleanup baseline includes facilities expected to need corrective action. The 2020 universe contains a wide variety of sites. Some properties are heavily contaminated while others were contaminated but have since been cleaned up. Still others have not been fully investigated yet, and may require little or no remediation. Inclusion in the 2020 Universe does not necessarily imply failure on the part of a facility to meet its RCRA obligations.

Date of Government Version: 11/11/2011
Date Data Arrived at EDR: 05/16/2012
Date Made Active in Reports: 05/25/2012
Number of Days to Update: 7

Source: Environmental Protection Agency
Telephone: 703-308-4044
Last EDR Contact: 02/14/2014
Next Scheduled EDR Contact: 05/26/2014
Data Release Frequency: Varies

PCB TRANSFORMER: PCB Transformer Registration Database

The database of PCB transformer registrations that includes all PCB registration submittals.

Date of Government Version: 02/01/2011
Date Data Arrived at EDR: 10/19/2011
Date Made Active in Reports: 01/10/2012
Number of Days to Update: 83

Source: Environmental Protection Agency
Telephone: 202-566-0517
Last EDR Contact: 01/30/2014
Next Scheduled EDR Contact: 05/12/2014
Data Release Frequency: Varies

COAL ASH EPA: Coal Combustion Residues Surface Impoundments List

A listing of coal combustion residues surface impoundments with high hazard potential ratings.

Date of Government Version: 08/17/2010
Date Data Arrived at EDR: 01/03/2011
Date Made Active in Reports: 03/21/2011
Number of Days to Update: 77

Source: Environmental Protection Agency
Telephone: N/A
Last EDR Contact: 12/13/2013
Next Scheduled EDR Contact: 03/24/2014
Data Release Frequency: Varies

US FIN ASSUR: Financial Assurance Information

All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.

Date of Government Version: 11/20/2013
Date Data Arrived at EDR: 12/03/2013
Date Made Active in Reports: 02/13/2014
Number of Days to Update: 72

Source: Environmental Protection Agency
Telephone: 202-566-1917
Last EDR Contact: 02/14/2014
Next Scheduled EDR Contact: 06/02/2014
Data Release Frequency: Quarterly

Financial Assurance: Financial Assurance Information Listing

Financial assurance information for underground storage tank facilities. Financial assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 11/25/2013
Date Data Arrived at EDR: 12/31/2013
Date Made Active in Reports: 01/27/2014
Number of Days to Update: 27

Source: Department of Environmental Management
Telephone: 334-271-7759
Last EDR Contact: 12/31/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Quarterly

COAL ASH: Coal Ash Disposal Sites
A listing of coal ash disposal site locations.

Date of Government Version: 02/02/2009
Date Data Arrived at EDR: 06/25/2009
Date Made Active in Reports: 07/17/2009
Number of Days to Update: 22

Source: Department of Environmental Management
Telephone: 334-271-7718
Last EDR Contact: 01/13/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Varies

COAL ASH DOE: Steam-Electric Plant Operation Data
A listing of power plants that store ash in surface ponds.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 08/07/2009
Date Made Active in Reports: 10/22/2009
Number of Days to Update: 76

Source: Department of Energy
Telephone: 202-586-9719
Last EDR Contact: 01/13/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Varies

US AIRS (AFS): Aerometric Information Retrieval System Facility Subsystem (AFS)

The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

Date of Government Version: 10/23/2013
Date Data Arrived at EDR: 11/06/2013
Date Made Active in Reports: 12/08/2013
Number of Days to Update: 30

Source: EPA
Telephone: 202-564-5962
Last EDR Contact: 12/28/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Annually

US AIRS MINOR: Air Facility System Data
A listing of minor source facilities.

Date of Government Version: 10/23/2013
Date Data Arrived at EDR: 11/06/2013
Date Made Active in Reports: 12/08/2013
Number of Days to Update: 30

Source: EPA
Telephone: 202-564-5962
Last EDR Contact: 12/28/2013
Next Scheduled EDR Contact: 04/14/2014
Data Release Frequency: Annually

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP: EDR Proprietary Manufactured Gas Plants

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oil waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

EDR US Hist Auto Stat: EDR Exclusive Historic Gas Stations

EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR US Hist Cleaners: EDR Exclusive Historic Dry Cleaners

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR US Hist Auto Stat: EDR Proprietary Historic Gas Stations - Cole

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: N/A
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR US Hist Cleaners: EDR Proprietary Historic Dry Cleaners - Cole

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: N/A
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA LUST: Recovered Government Archive Leaking Underground Storage Tank

The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 12/28/2013
Number of Days to Update: 178

Source: EDR
Telephone: N/A
Last EDR Contact: 08/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

RG4 HMS: Recovered Government Archive State Hazardous Waste Facilities List

The EDR Recovered Government Archive State Hazardous Waste database provides a list of SHWS incidents derived from historical databases and includes many records that no longer appear in current government lists.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 12/26/2013
Number of Days to Update: 178

Source: EDR
Telephone: N/A
Last EDR Contact: 08/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

CT MANIFEST: Hazardous Waste Manifest Data
Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a land facility.

Date of Government Version: 07/30/2013
Date Data Arrived at EDR: 08/19/2013
Date Made Active in Reports: 10/03/2013
Number of Days to Update: 45

Source: Department of Energy & Environmental Protection
Telephone: 880-424-5376
Last EDR Contact: 02/21/2014
Next Scheduled EDR Contact: 06/02/2014
Data Release Frequency: Annually

NJ MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2011
Date Data Arrived at EDR: 07/19/2012
Date Made Active in Reports: 08/28/2012
Number of Days to Update: 40

Source: Department of Environmental Protection
Telephone: N/A
Last EDR Contact: 01/17/2014
Next Scheduled EDR Contact: 04/28/2014
Data Release Frequency: Annually

NY MANIFEST: Facility and Manifest Data

Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

Date of Government Version: 11/01/2013
Date Data Arrived at EDR: 11/07/2013
Date Made Active in Reports: 11/18/2013
Number of Days to Update: 11

Source: Department of Environmental Conservation
Telephone: 618-402-8851
Last EDR Contact: 02/07/2014
Next Scheduled EDR Contact: 05/18/2014
Data Release Frequency: Annually

PA MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2012
Date Data Arrived at EDR: 07/24/2013
Date Made Active in Reports: 08/19/2013
Number of Days to Update: 26

Source: Department of Environmental Protection
Telephone: 717-783-8980
Last EDR Contact: 01/20/2014
Next Scheduled EDR Contact: 05/05/2014
Data Release Frequency: Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

RI MANIFEST: Manifest Information

Hazardous waste manifest information

Date of Government Version: 12/31/2012
Date Data Arrived at EDR: 06/21/2013
Date Made Active in Reports: 08/05/2013
Number of Days to Update: 45

Source: Department of Environmental Management
Telephone: 401-222-2797
Last EDR Contact: 11/25/2013
Next Scheduled EDR Contact: 03/10/2014
Data Release Frequency: Annually

WI MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2012
Date Data Arrived at EDR: 08/09/2013
Date Made Active in Reports: 09/27/2013
Number of Days to Update: 49

Source: Department of Natural Resources
Telephone: N/A
Last EDR Contact: 12/11/2013
Next Scheduled EDR Contact: 03/31/2014
Data Release Frequency: Annually

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data

Source: Rextag Strategies Corp.

Telephone: (281) 769-2247

U.S. Electric Transmission and Power Plants Systems Digital GIS Data

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.

Telephone: 312-280-5991

The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services

Telephone: 410-788-3000

A listing of hospitals with Medicare provider number, produced by Centers for Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes

Source: National Institutes of Health

Telephone: 301-594-8248

Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: Licensed Centers

Source: Department of Human Resources

Telephone: 334-242-1426

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geological Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

STREET AND ADDRESS INFORMATION

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GEOCHECK®- PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

LITTLE CANOE CREEK - 40 ACRES
1280-1299 CANOE CREEK RD
ATTALLA, AL 35954

TARGET PROPERTY COORDINATES

Latitude (North):	33.9659 - 33° 57' 57.24"
Longitude (West):	86.1648 - 86° 9' 53.28"
Universal Transverse Mercator:	Zone 16
UTM X (Meters):	577162.5
UTM Y (Meters):	3758495.0
Elevation:	615 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map:	33086-H2 STEELE, AL
Most Recent Revision:	1972

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principal investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

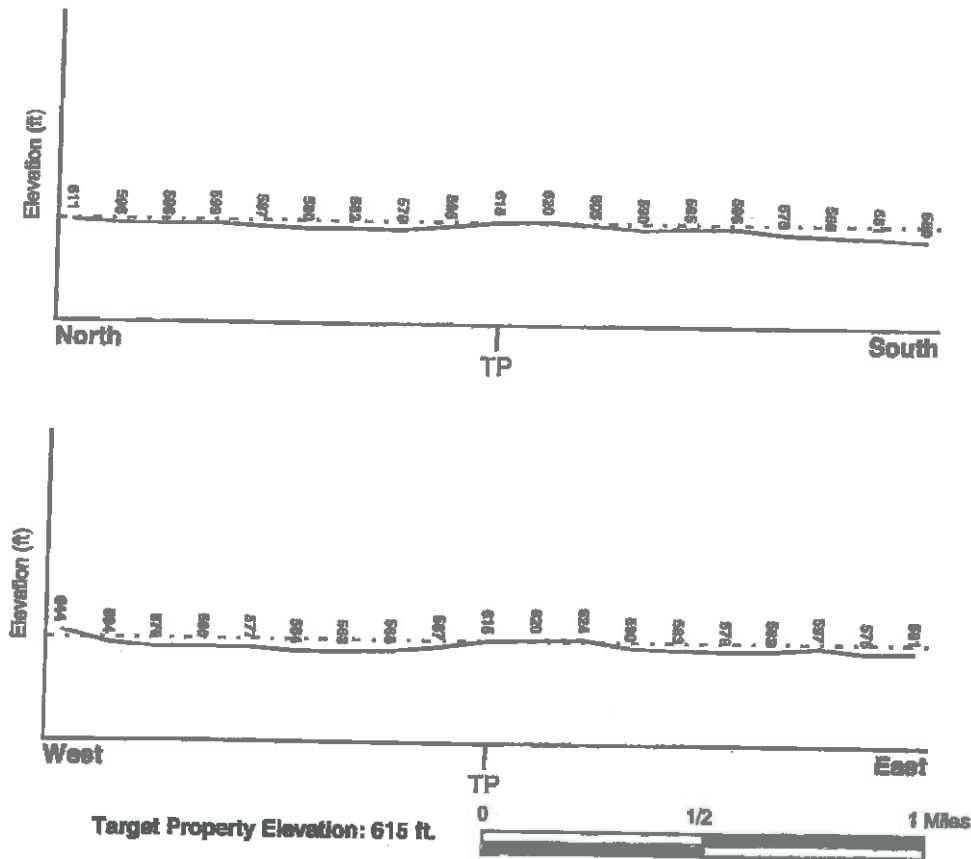
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General WNW

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5" Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

Target Property County
ETOWAH, AL

FEMA Flood Electronic Data
YES - refer to the Overview Map and Detail Map

Flood Plain Panel at Target Property:

01055C - FEMA DFIRM Flood data

Additional Panels in search area:

Not Reported

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property
STEELE

NWI Electronic Data Coverage
YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the data of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

MAP ID
Not Reported

LOCATION FROM TP

GENERAL DIRECTION GROUNDWATER FLOW

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

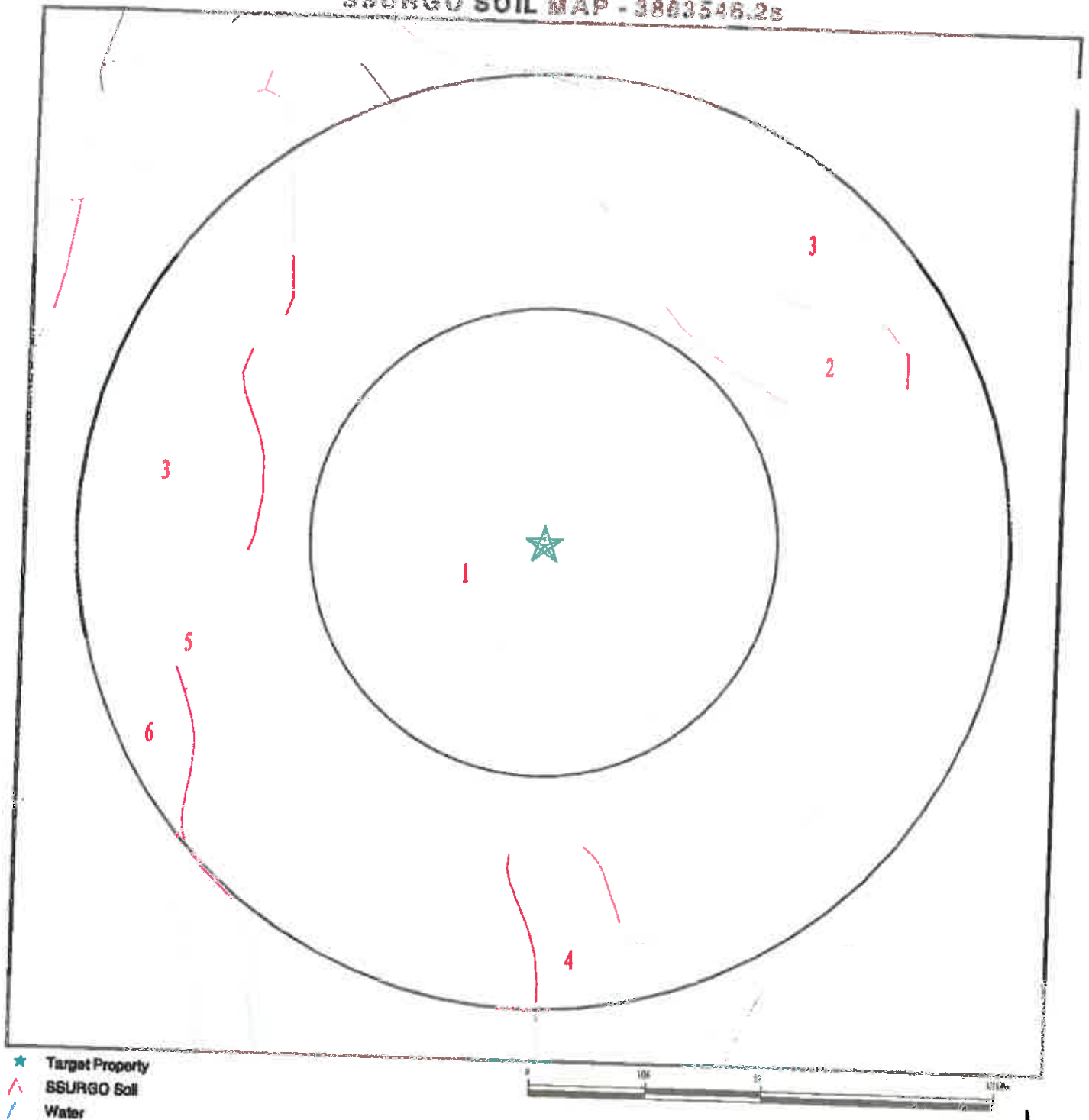
Era:	Paleozoic
System:	Ordovician
Series:	Ordovician
Code:	0 (decoded above as Era, System & Series)

GEOLOGIC AGE IDENTIFICATION

Category: Stratified Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

SSURGO SOIL MAP - 3863546.2s



SITE NAME: Little Canoe Creek - 40 Acres
ADDRESS: 1260-1299 CANOE CREEK RD
Attalla AL 35954
LAT/LONG: 33.8659 / 86.1648

CLIENT: Goodwyn Mills & Cawood Envrln.
CONTACT: Stuart Blackwell
INQUIRY #: 3863546.2s
DATE: February 24, 2014 4:42 pm

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GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. The following information is based on Soil Conservation Service SSURGO data.

Soil Map ID: 1

Soil Component Name: Conasauga

Soil Surface Texture: loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	3 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 60%), silt.	Max: 14 Min: 4	Max: 6 Min: 3.6
2	3 inches	9 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 60%), Lean Clay	Max: 1.4 Min: 0.42	Max: 6 Min: 3.6
3	9 inches	38 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 60% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 6.5 Min: 3.6
4	38 inches	59 inches	weathered bedrock	Not reported	Not reported	Max: 1.4 Min: 0.42	Max: Min:

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Map ID: 2

Soil Component Name: Gaylesville

Soil Surface Texture: silt loam

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Somewhat poorly drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 31 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	9 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 4 Min: 0.42	Max: 6 Min: 3.6
2	9 inches	27 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 6 Min: 3.6
3	27 inches	59 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 6 Min: 3.6

Soil Map ID: 3

Soil Component Name: Conasauga

Soil Surface Texture: loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	3 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), eH.	Max: 14 Min: 4	Max: 6 Min: 3.8
2	3 inches	8 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 1.4 Min: 0.42	Max: 6 Min: 3.6
3	9 inches	38 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 6.5 Min: 3.8
4	38 inches	58 inches	weathered bedrock	Not reported	Not reported	Max: 1.4 Min: 0.42	Max: Min:

Soil Map ID: 4

Soil Component Name: Conasauga

Soil Surface Texture: loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity mloro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	3 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14 Min: 4	Max: 6 Min: 3.6
2	3 inches	9 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%); Lean Clay	Max: 1.4 Min: 0.42	Max: 6 Min: 3.6
3	9 inches	36 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 6.5 Min: 3.6
4	38 inches	59 inches	weathered bedrock	Not reported	Not reported	Max: 1.4 Min: 0.42	Max: Min:

Soil Map ID: 5

Soil Component Name: Chewacla

Soil Surface Texture: silt loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Somewhat poorly drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 31 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	18 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6.6 Min: 4.5
2	18 inches	22 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6.5 Min: 4.5
3	22 inches	59 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14 Min: 4	Max: 7.8 Min: 4.5
4	59 inches	63 inches	variable	Not reported	Not reported	Max: Min:	Max: Min:

Soil Map ID: 6

Soil Component Name: Choccolocco

Soil Surface Texture: silt loam

Hydrologic Group: Class B - Moderate infiltration rates. Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.

Soil Drainage Class: Well drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	5 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6 Min: 4.5
2	5 inches	55 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14 Min: 4	Max: 6 Min: 4.5
3	55 inches	72 inches	sandy clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 42 Min: 14	Max: 6 Min: 4.5

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

<u>DATABASE</u>	<u>SEARCH DISTANCE (miles)</u>
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No PWS System Found		

Note: PWS System location is not always the same as well location.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

STATE DATABASE WELL INFORMATION

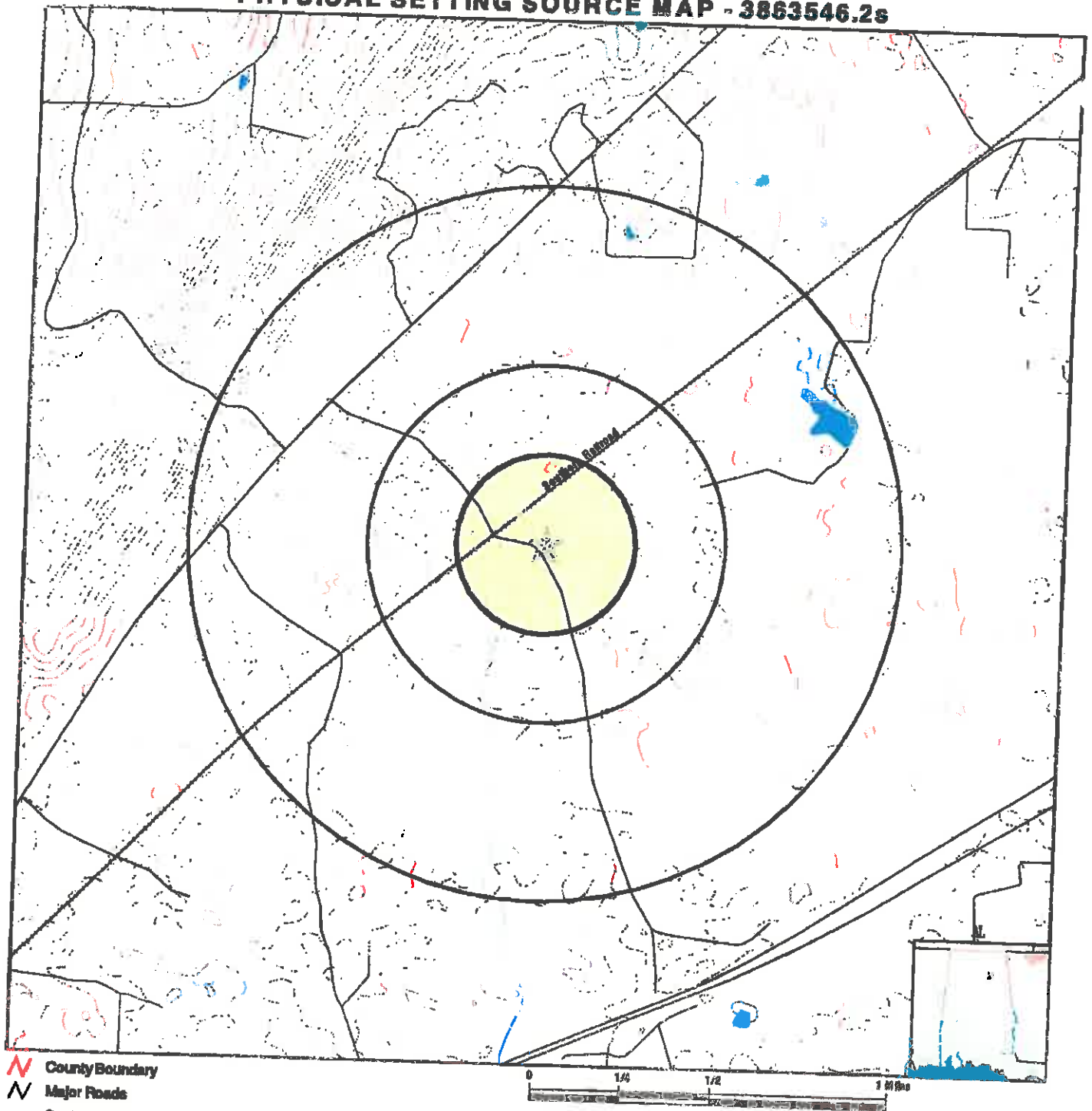
MAP ID

No Wells Found

WELL ID

LOCATION
FROM TP

PHYSICAL SETTING SOURCE MAP - 3863546.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons

- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Oil, gas or related wells

SITE NAME: Little Canos Creek - 40 Acres ADDRESS: 1260-1299 CANOE CREEK RD Atlanta AL 35954 LAT/LONG: 33.8659 / 86.1648	CLIENT: Goodwyn Mills & Cawood Envrn. CONTACT: Stuart Blackwell INQUIRY #: 3863546.2s DATE: February 24, 2014 4:42 pm
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GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

State Database: AL Radon

Radon Test Results

Num Tested	< 4 pCi/L	> 4 pCi/L	% > 4 pCi/L	Avg Level	Highest
25	24	1	4	2.19	11.7

Federal EPA Radon Zone for ETOWAH County: 2

Note: Zone 1 indoor average level > 4 pCi/L
 : Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L
 : Zone 3 indoor average level < 2 pCi/L

Federal Area Radon Information for Zip Code: 35954

Number of sites tested: 1

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	Not Reported	Not Reported	Not Reported	Not Reported
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	3.100 pCi/L	100%	0%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)

Source: United States Geologic Survey

EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2008. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

HYDROLOGIC INFORMATION

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System

Source: EDR proprietary database of groundwater flow information

EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit

Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, *Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).*

STATSGO: State Soil Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Service

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)

Telephone: 800-672-5559

SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Service, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)

This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

STATE RECORDS

Alabama Wells Data

Source: Department of Environmental Management

Telephone: 334-271-7985

OTHER STATE DATABASE INFORMATION

Well Surface Locations

Source: Geological Survey of Alabama, State Oil and Gas Board

Telephone: 205-247-3861

A listing of oil and gas well locations in the state

RADON

State Database: AL Radon

Source: Department of Public Health

Telephone: 334-206-5381

Short-Term Test Results for Alabama Counties

Area Radon Information

Source: USGS

Telephone: 703-356-4020

The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones

Source: EPA

Telephone: 703-356-4020

Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities

Source: Federal Aviation Administration, 800-467-6866

Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STREET AND ADDRESS INFORMATION

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**APPENDIX IV
ENVIRONMENTAL DATA RESOURCES
AERIAL PHOTO DECADE REPORT**

Little Canoe Creek - 40 Acres
1260-1299 CANOE CREEK RD
Attalla, AL 35954

Inquiry Number: 3863546.5
February 25, 2014

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th Floor
Shelton, Connecticut 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

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with any questions or comments.

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Date EDR Searched Historical Sources:
Aerial Photography February 25, 2014

Target Property:
1260-1299 CANOE CREEK RD
Attalla, AL 35954

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
1969	Aerial Photograph. Scale: 1"=500'	Panel #: 33086-H2, Steele, AL; Flight Date: October 23, 1969	EDR
1969	Aerial Photograph. Scale: 1"=500'	Panel #: 33086-H2, Steele, AL; Flight Date: November 05, 1969	EDR
1972	Aerial Photograph. Scale: 1"=500'	Panel #: 33086-H2, Steele, AL; Flight Date: January 01, 1972	EDR
1975	Aerial Photograph. Scale: 1"=1000'	Panel #: 33086-H2, Steele, AL; Flight Date: December 02, 1975	EDR
1992	Aerial Photograph. Scale: 1"=750'	Panel #: 33086-H2, Steele, AL; Flight Date: January 11, 1992	EDR
1997	Aerial Photograph. Scale: 1"=500'	Panel #: 33086-H2, Steele, AL; DOQQ - acquisition dates: March 07, 1997	EDR
2005	Aerial Photograph. Scale: 1"=500'	Panel #: 33086-H2, Steele, AL; Flight Year: 2005	EDR
2006	Aerial Photograph. Scale: 1"=500'	Panel #: 33086-H2, Steele, AL; Flight Year: 2006	EDR
2009	Aerial Photograph. Scale: 1"=500'	Panel #: 33086-H2, Steele, AL; Flight Year: 2009	EDR
2011	Aerial Photograph. Scale: 1"=500'	Panel #: 33086-H2, Steele, AL; Flight Year: 2011	EDR

3863546.5

2

EA - 3LL - 280

INQUIRY #: 3883546.5

YEAR: 1969

— = 500'





INQUIRY #: 3863546.5

YEAR: 1969

| = 500'





INQUIRY #: 3883546.5

YEAR: 1972

Scale: 500'





INQUIRY #: 3863546.5

YEAR: 1975

—|— = 1000'

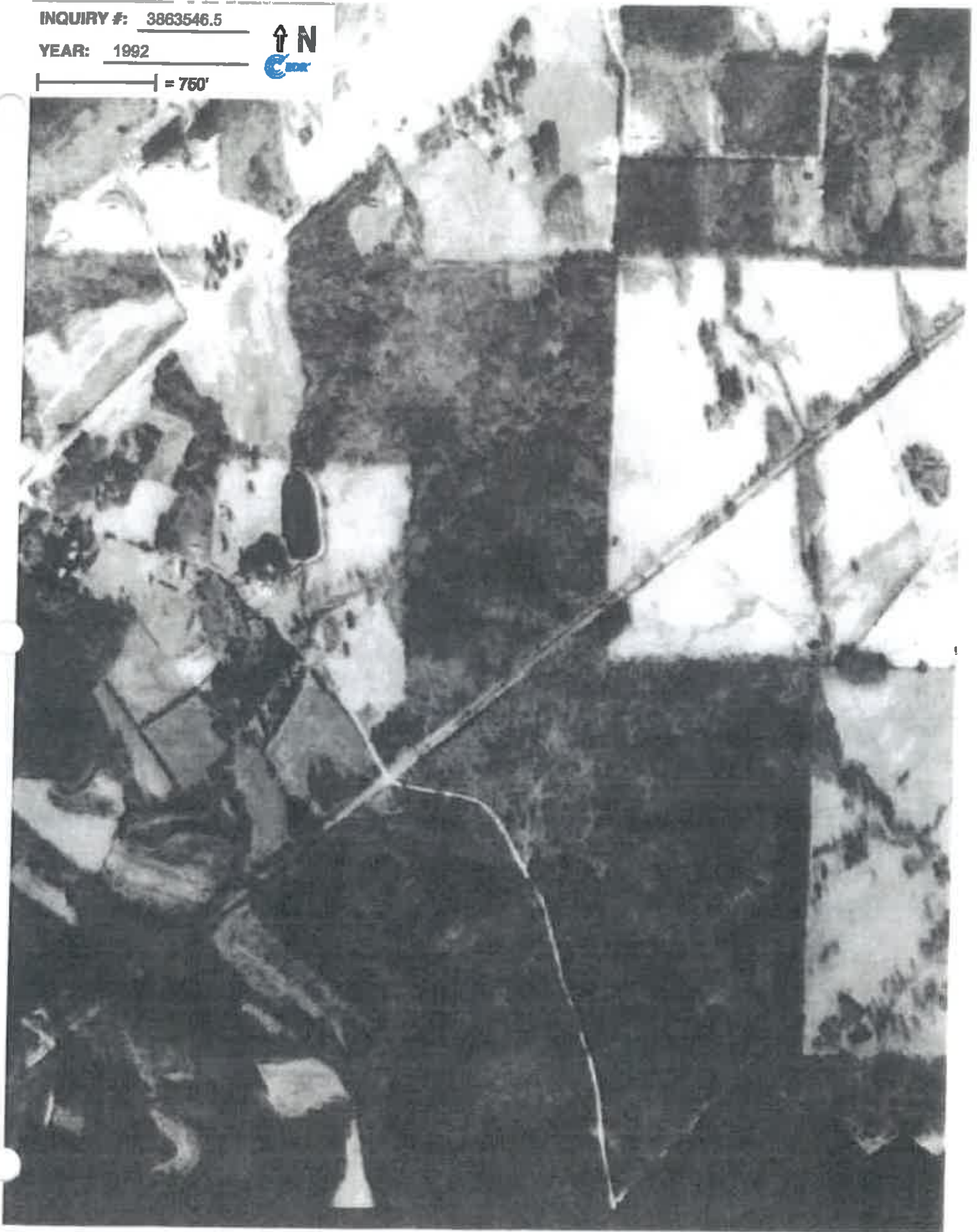


INQUIRY #: 3863546.5

YEAR: 1992



| = 750'





INQUIRY #: 3863546.5

YEAR: 1997

— = 500'

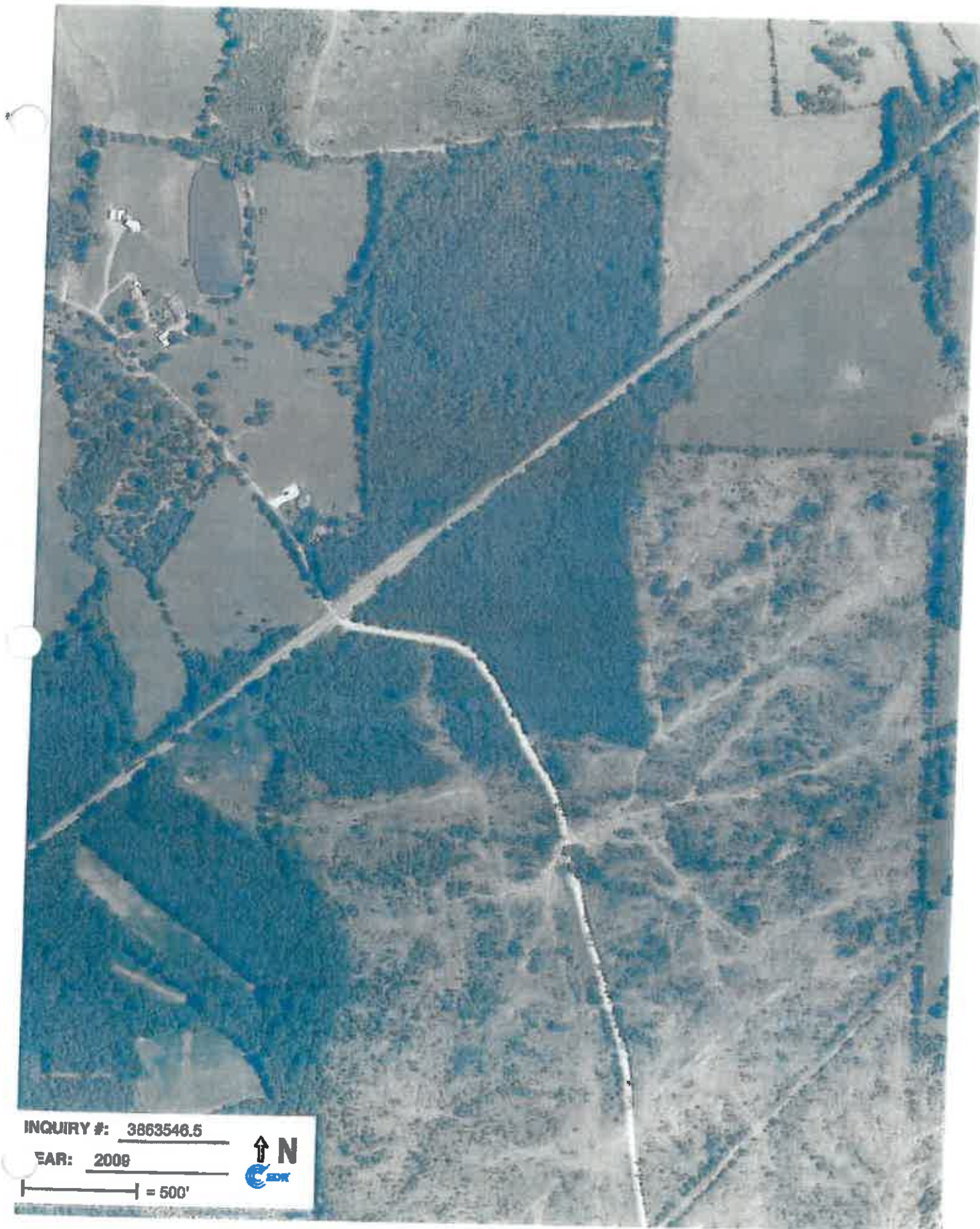




AS198 Phase I Environmental Study 2008-05-14



AS198 Phase I Environmental Study 2008-05-14



AS198 Phase I Environmental Study 2008-05-14



AS198 Phase I Environmental Study 2008-05-14

**APPENDIX V
ASTM E 1527-13
USER QUESTIONNAIRE**

ASTM E 1527-13 User Questionnaire

In order to qualify for one of the *Landowner Liability Protections (LLPs)*¹⁰⁷ offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "*Brownfields Amendments*"),¹⁰⁸ the user must conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31. These inquiries must also be conducted by EPA Brownfield Assessment and Characterization grantees. The user should provide the following information to the *environmental professional*. Failure to conduct these inquiries could result in a determination that "*all appropriate inquiries*" is not complete. Please note that you are not being asked to evaluate the property, but rather to provide your knowledge of information on the property.

Site Name/Address: LITTLE CANYON CREEK Wd. SITE 39ac Hood TRACT

Person Interviewed/Title: PATRICK SIMMONS /CAU Date: 3/4/14

If known, when was the property initially developed? NOT developed

If different, when were the current building(s) on the property constructed? N/A

1. Environmental liens that are filed or recorded against the property (40 CFR 312.25)

Did a search of recorded land title records (or judicial records where appropriate) identify any environmental liens filed or recorded against the property under federal, tribal, state or local law?

Yes No If you answer yes, please include an explanation in the space provided below:

2. Activity and use limitations that are in place on the property or that have been filed or recorded against the property (40 CFR 312.26(a)(1)(v) and vi).

Did a search of recorded land title records (or judicial records where appropriate), identify any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the property and/or have been filed or recorded against the property under federal, tribal, state or local law?

Engineering Controls are defined as physical modifications to a site or facility to reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or ground water on the property). *Institutional Controls* are defined as a legal or administrative restriction on the use of, or access to, a site or facility to 1) reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or ground water on the property, or 2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment.

Yes No If you answer yes, please include an explanation in the space provided below:

3. Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).

Do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?

Yes No If you answer yes, please include an explanation in the space provided below:

4. Relationship of the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29).

a) Does the purchase price being paid for this property reasonably reflect the fair market value of the property?

Yes No If you answer no, please include an explanation in the space provided below, including whether the lower purchase price is because contamination is known or believed to be present at the property?

5. Commonly known or reasonably ascertainable information about the property (40 CFR 312.30).

Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example, as User:

a. Do you know the past uses of the property?

Yes No

b. Do you know of specific chemicals that are present or once were present at the property?

Yes No

c. Do you know of spills or other chemical releases that have taken place at the property?

Yes No

d. Do you know of any environmental cleanups that have taken place at the property?

Yes No

If you answered yes to any of the questions above, please include an explanation in the space provided below:

6. The degree of obviousness of the presence of likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31):

As the User of this ESA, based on your knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property?

Yes No If you answer yes, please include an explanation in the space provided below:

Please provide the following property contact information:

Property Owner: ETownship County

Phone Number: 256-549-5495

Key Site Personnel: PATRICK CUMINS

Phone Number: 256-549-5495

Past Owner: Josephine F. Hood

Phone Number: 256-546-3531

**APPENDIX VI
ENVIRONMENTAL PROFESSIONAL**



Stuart Blackwell, PWS

Biologist

CAREER SUMMARY

Stuart is a Biologist who has 12 years of experience in conducting Phase I and Phase II Environmental Site Assessments, Environmental Assessments, Wetland Compliance, and Threatened/Endangered Species surveys. Stuart is proficient in performing legal research, on-site investigations, historical review, interviews, and preparation of written reports. He also has experience in ground water monitoring, soil sampling, asbestos surveys, and lead paint surveys.

EDUCATION

- o B.S. Wildlife Biology, Auburn University, 2000

CERTIFICATION & TRAINING

- o Erosion and Sediment Control & Stormwater Management, 2003
- o Phase I Environmental Site Assessment Training, 2006
- o Qualified Credentialed Inspector #46475 (QCI), 2006
- o Project Management Bootcamp, 2007
- o Stream Restoration Using Natural Channel Design, 2007
- o Wetland Delineation Training, 2009
- o Stream Identification Training, 2010
- o Professional Wetland Scientist #2002, 2010

PHASE I ENVIRONMENTAL SITE ASSESSMENTS

- o American Village - Montevallo, AL
- o Villas at Moore Farm - Huntsville, AL
- o Prince Property - Jackson County, AL
- o Bass Pro Shops - Leeds, AL
- o Birmingham Wholesale Furniture - Birmingham, AL
- o Little Canoe Creek Industrial Park - Etowah County, AL
- o Indian Head Cotton Mill - Cordova, AL
- o Clay County Airport - Clay County, AL
- o Ooltawah Urgent Care Center - Ooltawah, TN
- o Russell Properties - Alexander City, AL
- o Dollar General Distribution Center - Birmingham, AL
- o Hibbett Sporting Goods Distribution Center - Shelby County, AL
- o Hyundai Manufacturing Facility - Montgomery, AL
- o Meridianville Urgent Care Center - Meridianville, AL

PHASE II ENVIRONMENTAL SITE ASSESSMENTS

- o Mountain Brook Village - Birmingham, AL
- o Grief Brothers Property - Cullman, AL
- o 1st Avenue CSX Property - Montgomery, AL

**PHASE I ENVIRONMENTAL SITE ASSESSMENT
Little Canoe Creek - Outparcels
Steele/Attalla, Etowah County, Alabama**



Prepared For:
Etowah County Commission
800 Forest Avenue
Gadsden, AL 35901

Prepared By:

GMC

2701 First Avenue South
Birmingham, Alabama 35233

July 18, 2017

TABLE OF CONTENTS

1.0	EXECUTIVE SUMMARY	1
2.0	INTRODUCTION	3
2.1	Purpose	3
2.2	Detailed Scope of Services	3
2.3	Significant Assumptions	4
2.4	Limitations and Exceptions	4
2.5	Special Terms and Conditions	5
2.6	User Reliance	6
3.0	SITE AND VICINITY DESCRIPTION	7
3.1	Site Location and Legal Description	7
3.2	Site and Vicinity Characteristics	7
3.3	Current Use of Property	9
3.4	Description of Structures, Roads, and Other Improvements on Site	9
	The property is undeveloped and currently does not have access to the city sewer system	9
3.5	Current Use of Adjoining Properties	9
4.0	USER PROVIDED INFORMATION	10
4.1	Environmental Liens	10
4.2	Activity and Use Limitations	10
4.3	Specialized Knowledge	10
4.4	Valuation Reduction for Environmental Issues	10
4.5	Commonly Known or Reasonably Ascertainable Information	10
4.6	Owner, Property Manager, and Occupant Information	10
4.7	Reason for Performing Phase I	10
5.0	RECORDS REVIEW	11
5.1	Standard Records Review	11
5.2	Additional Environmental Record Sources	16
5.3	Physical Setting Source(s)	16
5.4	Historical Use Information on the Property	16
6.0	SITE RECONNAISSANCE	17
6.1	Methodology and Limiting Conditions	17
6.2	General Site Setting	17
6.3	Exterior Observations	17
6.4	Interior Observations	17
7.0	INTERVIEWS	18
7.1	Interview with User	18
7.2	Interview with Owners	18
8.0	FINDINGS	19
9.0	OPINIONS AND CONCLUSION	21
9.1	Opinions	21
9.2	Conclusion	21
9.3	Deviations	21
9.4	Additional Services	21
10.0	REFERENCES	22
11.0	QUALIFICATIONS AND SIGNATURES OF PROFESSIONALS	23

APPENDICES

- I. Figures
 - 1. General Location Map
 - 2. USGS Quadrangle Map, 1947 (photo revised 1972) Steele, Alabama
 - 3. Aerial Photograph
 - 4. Etowah County Soil Survey Map
- II. Photographs
- III. The EDR Radius Map Report with GeoCheck
- IV. ASTM E 1527-13 User Questionnaire & E2600-10 Owner Questionnaire
- V. Certified Sanborn Map Report and EDR Aerial Photo Decade Package
- VI. Environmental Professional Qualifications

1.0 EXECUTIVE SUMMARY

Goodwyn, Mills, and Cawood (GMC) was retained by the Etowah County Commission (User), to conduct a Phase I ESA on an approximate 107 ± acres located off of Canoe Creek Road North near Steele, Alabama (Figure 1). GMC conducted Phase I ESA's on several adjacent properties in 2009, 2012, and 2014. The target property is divided into 4 parcels for the purposes of this report (See Figures in Appendix I). Parcel 1 is located immediately south of US-11 and has center coordinates of N33.9689 and W86.1756. Parcel 2 is also located south of US-11 and east of Canoe Creek Road and has center coordinates of N33.9695 and W86.1663. Parcel 3 is located immediately south of the railroad tracks on the west side of Canoe Creek Road and has center coordinates of N33.9654 and W86.1681. Parcel 4 is located immediately north of I-59 and has center coordinates of N33.9478 and W86.1601. The subject site is further described as Parcels 1 and 3 being located in Sections 24 and 25 of Township-12-South, Range-4-East and Parcels 2 and 4 being located in Sections 19 and 31 of Township-12-South, Range-5-East in Etowah County, Alabama. The subject property is located within the Middle Coosa Watershed (HUC Code 03150106). This Phase I ESA includes a records review of state and federally listed facilities, maps, interviews, historical research, and visual observations of the site. A Phase I ESA does not include any testing or sampling of materials (i.e., soil, water, air, building materials, etc.).

GMC conducted an Environmental Data Resources review for the subject site based on the All Appropriate Inquiries (AAI) standard checklist with search distances relevant to each environmental database. This records review revealed no facilities within the relative search distance from the target property. Information regarding the records review is located in Section 5.1, 5.2, 9.4, and the EDR is attached as Appendix III.

GMC conducted an EDR Aerial Photo Decade Package review and a Certified Sanborn Map Report review for the subject site to gain information on historical use of the property and its adjoining area. The Certified Sanborn Map Report did not find any maps covering the property, while the aerial package includes historical aerial photos taken in 1952, 1972, 1975, 1982, 1987, 1992, 1997, 2005, 2006, 2009, and 2011 (Appendix V). The first aerial photo in 1952 is somewhat unclear, but it appears that Parcels 1, 2, and 3 were all forested with mostly forested and some cleared surrounding areas. Parcel 4 was not included in the 1952 aerial. In the 1972 aerial, it appears that Parcel 2 was partially cleared. During this time some land was cleared north of Parcel 4. In 1982, land was cleared on Parcel 4 and a manmade lake was constructed north of this parcel. In 1997 it appears that a building was constructed on the adjacent property northeast of Parcel 1. The parcels and surrounding areas remain relatively unchanged until present day.

On May 2, 2017, representatives of GMC conducted a reconnaissance at and within an approximate 1-mile radius around the subject site. GMC accessed the site from Little Canoe Creek Road North. GMC noted that the site appeared to be mostly undeveloped with some cleared areas. No structures were noted on the property during the site visit. There were no signs of distressed vegetation or stained soils on the

subject property. No structures were noted on the date of the site visit; therefore, no interior observations were made.

A representative of GMC conducted an interview with a representative of the user, Ms. Sherrie Kelley, CAO for the Etowah County Commission (User). Ms. Kelley is unaware of any hazardous substances, spills, contamination, or environmental liens related to the site. The completed User questionnaire can be found attached in Appendix IV. The Etowah County Commission is also the Owner of the property. Therefore, an additional owner interview was not conducted.

This report was completed in general accordance with the requirements established by the American Society for Testing and Materials (ASTM) E 1527-13 Standard and also meets the requirements of the AAI rule. **This Assessment has revealed no evidence of Recognized Environmental Conditions (REC's), and no further investigation is recommended at this time.**

2.0 INTRODUCTION

Goodwyn, Mills, and Cawood (GMC) was retained by the Etowah County Commission (User), to conduct a Phase I ESA on an approximate 107 ± acres located off of Canoe Creek Road North near Steele, Alabama (Figure 1). The target property is divided into 4 parcels for the purposes of this report (See Figures in Appendix I). This Phase I ESA includes a records review of state and federally listed facilities, maps, interviews, historical research, and visual observations of the site. A Phase I ESA does not include any testing or sampling of materials (i.e., soil, water, air, building materials, etc.).

2.1 Purpose

The purpose of a Phase I ESA is to conduct a records review, historical review, and visual site inspection to identify recognized environmental conditions at the subject site. The term recognized environmental conditions means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term includes hazardous substances or petroleum products, even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions.

2.2 Detailed Scope of Services

GMC conducted the Phase I ESA in general accordance with the AAI rule and the ASTM E 1527-13 Standard Practice for Environmental Site Assessments: Phase I ESA Process.

The scope of work performed as part of the Phase I ESA is as follows:

- A historical review of the use and improvements made to the subject site.
- A review of applicable building, zoning, planning, sewer, water, fire and environmental department records that would have information on or have an interest in the property and neighboring sites.
- An investigation of the subject property and neighboring properties with regard to the Environmental Protection Agency's (EPA) National Priorities List (NPL) or Comprehensive

Environmental Response Compensation and Liability Information System (CERCLIS) list and similar state lists.

- An inspection of the site and all improvements with a visual inspection for hazardous materials and regulated non-hazardous materials.
- A review of available information to determine whether present owners or tenants have stored, created or discharged hazardous materials or waste, and, if applicable, a review of whether appropriate procedures and safeguards have been observed.
- A determination of whether the information gathered indicates the presence or likely presence of any hazardous substances or petroleum products in, on, or at the property due to activities at the property or from migration to the property from other properties. For the purpose of this document, the term migration refers to the movement of hazardous substances or petroleum products in any form, including solid and liquid at the surface or subsurface, and vapor¹ in the subsurface.
- A written report summarizing the findings with conclusions as to the potential environmental degradation believed to be associated with the property.

2.3 Significant Assumptions

This report provides an overview of potential, past, and present environmental conditions associated with the subject site. The report is limited to the information available at the time of the assessment. It is possible that unreported or illegal disposal of materials impairing the environmental condition of the subject site may have occurred which could not be identified. The conclusions and recommendations regarding the environmental conditions presented in this report are based on the scope of work authorized by the User. Virtually no scope of work, no matter how exhaustive, can identify all contaminants or all conditions above and below ground.

2.4 Limitations and Exceptions

GMC has performed this investigation for the exclusive use of the User, their lending institution and their legal counsel specifically for the subject site. GMC prohibits republication or reuse of any report without GMC's prior written consent.

The conclusions contained in this report are based upon the conditions at the site during the time of the investigation. As stated in the ASTM E 1527-13 standard and AAI, an environmental site

¹ Vapor migration in the subsurface was assessed using the Tier I screening found in the ASTM E2600-10 standard

assessment meeting or exceeding the standard and completed less than 180 days prior to the date of acquisition of the property or (for transactions not involving an acquisition) the date of the intended transaction is presumed to be valid.

Environmental problems at this site not included in the scope of work, if any, are not the responsibility of GMC. Examples of such problems are unreported releases, unreported sites, and sites not listed by the Alabama Department of Environmental Management (ADEM) or by the EPA.

GMC has made no attempt to independently verify the information provided by others, and cannot be held responsible for false or erroneous information that was provided to GMC. Any documents or information that was obtained by GMC in the preparation of this report is assumed to be true and accurate.

The only warranty made by GMC in connection with the services provided is that we have used the degree of skill and care ordinarily exercised by similarly situated professionals in our locality. No other warranty, expressed or implied, is made or intended. GMC will not be required to sign any documents, no matter by whom requested, that would result in GMC having to certify, guarantee or warrant the existence of conditions whose existence GMC cannot ascertain. The user also agrees not to make resolution of any dispute with GMC or payment of any amount due to GMC in any way contingent upon GMC signing any such certification.

2.5 Special Terms and Conditions

The following are a list of issues that GMC specifically did not address in this ESA; however, the list is not exhaustive:

1. Asbestos-Containing Building Materials
2. Biological Agents
3. Cultural and Historic Resources
4. Ecological Resources
5. Endangered and Threatened Species
6. Health and Safety
7. Indoor Air Quality unrelated to releases of hazardous substances or petroleum products
8. Industrial Hygiene
9. Lead-Based Paint
10. Lead in Drinking Water
11. Mold
12. Radon
13. Regulatory Compliance
14. Wetlands or other Waters of the U.S.

2.6 User Reliance

The User may rely upon this document. The User's attorneys and other parties that are considered "interested parties" may rely upon this document by permission of the owner, and to the extent outlined in the AAI rule and ASTM E 1527-13 Standard. An environmental professional is not required to independently verify the information provided but may rely on information provided unless it is obvious that certain information is not correct based on other information or that he or she has actual knowledge that certain information is incorrect.

3.0 SITE AND VICINITY DESCRIPTION

3.1 Site Location and Legal Description

The subject site is located off of Little Canoe Creek Road North in Township-12-South, Range-4-East, Sections 24 and 25 and Township-12-South, Range-5-East, Sections 19 and 31 near Steele in Etowah County, Alabama (Refer to Figure 1). For the purposes of this report, the property was divided up into 4 separate parcels. Parcel 1 is located immediately south of US-11 and has center coordinates of N33.9689 and W86.1756. Parcel 2 is also located south of US-11 and east of Canoe Creek Road. This parcel has railroad tracks traversing the southeast corner of the property and has center coordinates of N33.9695 and W86.1663. Parcel 3 is located immediately south of the railroad tracks on the west side of Canoe Creek Road and has center coordinates of N33.9654 and W86.1681. Parcel 4 is located immediately north of I-59 and has center coordinates of N33.9478 and W86.1601. See Appendix I for the figures showing the location of each parcel.

3.2 Site and Vicinity Characteristics

Surface Drainage

According to the 1947 (photo revised 1972) Steele, Alabama U.S. Geological Survey Quadrangle Map, the elevation of the subject parcel is generally flat and lies between 560 and 600 feet above mean sea level. It appears that drainage from the property generally flows in a northerly direction and eventually flows into Little Canoe Creek (See Figure 2). The property lies within the Middle Coosa Watershed (HUC Code 03150106).

Regional Characteristics and Geological Setting

The subject site lies within the Valley and Ridge Physiographic Province and consists of a series of northeast-trending linear ridges and valleys underlain by alternating beds of hard and soft Paleozoic sedimentary rocks, which are highly faulted and folded and range in age from Cambrian to Pennsylvanian. The ridges are composed of cherty limestone, dolomite, and sandstones. The valleys are developed in more soluble limestone, dolomite, and shale. Resistant sandstone and chert underlie the ridges, and softer shale and limestone underlie the valleys. The Valley and Ridge Physiographic Province is included in the Southern Appalachian Ridges and Valleys Major Land Resource Area (MLRA). Soils in the valleys of the Southern Appalachian Ridges and Valleys were formed mainly in residuum of weathered limestone and are predominantly red, iron, and clay-rich types with silt loam surface textures. The ridges consist of cherty limestone that produce a gravelly loam and gravelly clay subsoil and a gravelly silt loam surface layer.

Hydrogeology

The site lies in Valley and Ridge Physiographic Province. Aquifers in this province consist of permeable geologic formations within folded and faulted Paleozoic sedimentary rocks. The rocks range in age from early to late Paleozoic. Most of the Valley and Ridge aquifers consist of limestone

or dolomite. The carbonate rocks are productive aquifers primarily because of the solution openings in the easily dissolved limestone and dolomite. These openings, which originate as bedding planes and joints in the carbonate rocks, are enlarged by percolating slightly acidic ground water, and become linked as a series of conduits that rapidly transmit large volumes of ground water through the carbonate rocks. The easily eroded carbonate rocks form wide valley floors, which are favorable areas for recharge. Other aquifers consist of sandstone formations but yield less water than do the carbonate rocks. Much of the water from the sandstone is obtained from fractures. Regolith, which acts as a porous media aquifer above the carbonate-rock aquifers, contains chert rubble of Cenozoic age that stores and transmits water slowly to the underlying fractured-rock aquifer.

Soils

According to the Etowah County, Alabama Soil Survey, the site consists of five (5) soil types listed below. Figure 4 illustrates the location of the subject site and the soil type located there. A brief description of the soil, written in the soil survey, is as follows:

- **Cedarbluff fine sandy loam , 0 to 2 percent slopes, (8)**
These deep, moderately well drained and somewhat poorly drained, nearly level soils are on stream terraces. They have loamy surface layers and subsoils. A compact, brittle layer in the subsoil restricts root growth of most annual plants and perches water during winter, early spring, and after other periods of high rainfall. This can be partially overcome by extensive subsurface and/or surface drainage systems. The erosion hazard is slight.
- **Chewacla silt loam, 0 to 2 percent slopes, (9)**
These deep, poorly drained, nearly level soil are on flood plains. They have loamy surface layers and subsoils. The root zone is often restricted by a seasonally high water table. These soils are subject to frequent flooding in the winter and early spring. This hazard can be overcome only by major flood control measures. The erosion hazard is slight.
- **Conasauga loam, 2 to 6 percent slopes, (12)**
These deep and moderately deep, well drained to moderately well drained, gently sloping soils are on uplands. They have loamy surface layers and sticky, plastic, clayey. The erosion hazard is moderate. A combination of several conservation practices is needed on cultivated fields to control erosion and provide for proper water disposal. Cropping systems that include sod and close growing crops are usually needed in rotation with cultivated crops.
- **Firestone loam, 2 to 6 percent slopes, (23)**
These deep and moderately deep, well drained to moderately well drained, gently sloping soils are on uplands. They have loamy surface layers and sticky, plastic, clayey subsoils. The erosion hazard is moderate. A combination of several conservation practices is needed on cultivated fields to control erosion and provide for proper water disposal.

- **Gaylesville silt loam, 0 to 2 percent slopes, (26)**

These deep, poorly drained to somewhat poorly drained, nearly level soils are on low stream terraces. They have loamy surface layers and clayey subsoils. Soil wetness can be partially overcome by extensive surface drainage systems. The erosion hazard is slight.

Three (3) soils above are listed as hydric in the Hydric Soils of Etowah County, Alabama (2005). Cedarbluff fine sandy loam (8), Conasauga loam (12), and Gaylesville silt loam (26) are considered to be hydric soils. A hydric soil is one that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions in the upper horizons, which may cause it to be classified as a wetland and subject to the jurisdiction of the U.S. Army Corps of Engineers.

3.3 Current Use of Property

Representatives of GMC visited the subject site on May 2, 2017. The property is currently owned by the Etowah County Commission and is vacant.

3.4 Description of Structures, Roads, and Other Improvements on Site

- **Structures**

No structures were noted within the target area.

- **Roads**

The property can be accessed off of Little Canoe Creek Road North.

- **Potable Water Supply**

The property is undeveloped and currently does not have access to the city water system.

- **Sewage Disposal System**

The property is undeveloped and currently does not have access to the city sewer system.

3.5 Current Use of Adjoining Properties

	North	South	East	West
Parcel 1	US-11/Forested	Forested/Undeveloped	Cleared	Forested/Cleared
Parcel 2	Forested/Cleared	US-11/Forested	Cleared	Cleared/some residential
Parcel 3	Railroad/Forested	Forested/Undeveloped	Forested/Undeveloped	Forested/Undeveloped
Parcel 4	Cleared	I-59/Forested	I-59/Forested	Forested

4.0 USER PROVIDED INFORMATION

The ASTM E 1527-13 User Questionnaire was completed by Ms. Sherrie Kelley, CAO for the Etowah County Commission (User). A summary of her responses are provided below and a copy of the completed User Questionnaire can be found in Appendix IV.

4.1 Environmental Liens

The User representative is unaware of any environmental liens filed or recorded against the property.

4.2 Activity and Use Limitations

The User representative has no knowledge of any activity or use limitations against the subject property.

4.3 Specialized Knowledge

The User representative has no specialized knowledge of the property.

4.4 Valuation Reduction for Environmental Issues

The User representative has no knowledge of a reduction of value due to environmental issues associated with the property.

4.5 Commonly Known or Reasonably Ascertainable Information

The User representative is not aware of any commonly known or reasonably ascertainable information pertaining to the property.

4.6 Owner, Property Manager, and Occupant Information

The property is owned by the Etowah County Commission.

4.7 Reason for Performing Phase I

A Phase I ESA is being performed at the request of the User as part of a "due diligence" evaluation to determine the environmental condition of the subject site.

5.0 RECORDS REVIEW

The purpose of the records review is to obtain and review records that will help identify recognized environmental conditions in connection with the property. Some records reviewed pertain not only to the property, but also to properties with an additional approximate search distance in order to help assess the likelihood of problems from migrating hazardous substances or petroleum products. Unless stated otherwise, the approximate minimum search distances used below were as specified in the ASTM Standard E 1527-13.

5.1 Standard Records Review

GMC conducted an EDR Radius Map Report review for the subject site. Below is the AAI standard checklist of environmental databases reviewed with search distances relevant to each database.

These databases are from the EPA and the ADEM. They are reviewed to determine if records exist of previous contamination episodes having occurred within the following approximate minimum search distance from the subject site:

<u>List</u>	<u>Search distance Miles</u>
Federal NPL	1.0
Federal Delisted NPL	1.0
Federal CERCLIS	0.5
Federal CERCLIS NFRAP	0.5
Federal RCRA CORRACT	1.0
Federal RCRA Non-CORRACTS TSD	0.5
Federal RCRA Generators	0.25
Federal IC/EC	0.5
Federal ERNS	0.001
State and Tribal Equivalent CERCLIS	1.0
State and Tribal Landfill and/or SWL	0.5
State and Tribal Leaking Storage Tank	0.5
State and Tribal Registered Storage Tank	0.25
State and Tribal IC/EC	0.5
State and Tribal Voluntary Cleanup	0.5
State and Tribal Brownfields	0.5
Additional Environmental Records	TP

The databases above were reviewed for pertinent information and they revealed the following:

1. Federal NPL Site List

NPL: National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

- None currently listed within the minimum 1.0-mile search area.

2. Federal Delisted NPL Site List

Delisted NPL: National Priority List Deletions. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425(e), sites may be deleted from the NPL where no further response is appropriate.

- None currently listed within the minimum 1.0-mile search distance.

3. Federal CERCLIS List

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System. CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

- None currently listed within the minimum 0.5-mile search distance.

4. Federal CERCLIS NFRAP Site List

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned. Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

- None currently listed within the minimum 0.5-mile search distance.

5. Federal RCRA CORRACTS Facilities List
CORRACTS: Correction Action Report. CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.
 - None currently listed within the minimum 1.0-mile search distance.

6. Federal RCRA Non-CORRACTS TSD Facilities List
RCRA-TSDF: RCRA – Treatment, Storage and Disposal. RCRAInfo is EPA’s comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.
 - None currently listed within the minimum 0.5-mile search distance.

7. Federal RCRA Generators List
RCRA-LQG: RCRA – Large Quantity Generators. RCRAInfo is EPA’s comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.
 - None currently listed within the minimum 0.5-mile search distance.

8. Federal Institutional Controls / Engineering Controls Registries
US INST CONTROLS: Sites with Institutional Controls. This registry contains a listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

US ENG CONTROLS: Engineering Controls Sites List. This registry contains a listing of sites with engineering controls in place. Engineering controls include various forms of caps,

building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

- None currently listed within the minimum 0.50-mile search distance.

9. Federal ERNS List

ERNS: Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

- None currently listed within the target property.

10. State- and tribal- equivalent CERCLIS

SHWS: Hazardous Substance Cleanup Fund. This listing provides hazardous substance sites, which pose a threat to public health and the environment, which will be cleaned up utilizing the Hazardous Substance Cleanup Fund.

- None currently listed within the minimum 1.0-mile search distance.

11. State and Tribal Landfill and/or Solid Waste Disposal Site Lists

SWF/LF: Permitted Landfills. Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

- None currently listed within the minimum 0.50-mile search distance.

12. State and Tribal Leaking Storage Tank Lists

LUST: Leaking Underground Storage Tank. Leaking Underground Storage Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

- None currently listed within the minimum 0.50-mile search distance.

13. State and Tribal Registered Storage Tank Lists

UST: Underground Storage Tank Information. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

- None currently listed within the minimum 0.25-mile search distance.
14. State and Tribal Institutional Control / Engineering Control Registries
ENG CONTROLS: Engineering Controls Site Listing. This registry includes a listing of sites with engineering controls included in the Land Division Cleanup Program Inventory Listing.
- INST CONTROLS: Land Division Brownfields 128(a) Program Site Listing. Institutional Controls (ICs) are non-engineered instruments, such as administrative and/or legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of a remedy by limiting land or resource use. There are five different types of controls including: governmental, proprietary, enforcement tools with IC components, informational devices, and unrestricted.
- None currently listed within the minimum 0.50-mile search distance.
15. State and Tribal Voluntary Cleanup Sites
VCP: Cleanup Program Inventory. Currently the Cleanup Inventory List contains information about sites undergoing assessment and possible cleanup under Alabama's Brownfield Redevelopment and Voluntary Cleanup Program. It also includes sites that have exited the program but were remediated to less than unrestricted levels.
- None currently listed within the minimum 0.50-mile search distance.
16. State and Tribal Brownfields Sites
BROWNFIELDS: Land Division Brownfields 128(a) Program Site Listing. The directory provides a brief look at sites being marketed as Brownfields, and a listing of Brownfields activities performed by ADEM. Brownfields are defined as real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.
- None currently listed within the minimum 0.50-mile search distance.

Orphan sites are sites that could not be mapped by the EDR First Search database due to lack of address information. The EDR did not list any orphan sites listed within the zip code of the subject site.

5.2 Additional Environmental Record Sources

Additional environmental record sources include local brownfield lists, local lists of landfill/solid waste disposal sites, local lists of hazardous waste/contaminated sites, local land records, records of emergency release reports, and other ascertainable records. The EDR Map Report did not list any additional records for properties within the relative search distances for each database.

5.3 Physical Setting Source(s)

The subject parcel was found on the 1947 (photo revised 1972) Steele, Alabama U.S. Geological Survey Quadrangle Map.

5.4 Historical Use Information on the Property

GMC conducted an EDR Aerial Photo Decade Package review and a Certified Sanborn Map Report review for the subject site to gain information on historical use of the property and its adjoining area. The Certified Sanborn Map Report did not find any maps covering the property, while the aerial package includes historical aerial photos taken in 1952, 1972, 1975, 1982, 1987, 1992, 1997, 2005, 2006, 2009, and 2011 (Appendix V). The first aerial photo in 1952 is somewhat unclear, but it appears that Parcels 1, 2, and 3 were all forested with mostly forested and some cleared surrounding areas. Parcel 4 was not included in the 1952 aerial. In the 1972 aerial, it appears that Parcel 2 was partially cleared. During this time some land was cleared north of Parcel 4. In 1982, land was cleared on Parcel 4 and a manmade lake was constructed north of this parcel. In 1997 it appears that a building was constructed on the adjacent property northeast of Parcel 1. The parcels and surrounding areas remain relatively unchanged until present day.

6.0 SITE RECONNAISSANCE

6.1 Methodology and Limiting Conditions

On May 2, 2017, representatives of GMC conducted a reconnaissance at and within an approximate 1-mile radius around the subject site. Except for the limitations and exceptions discussed in Section 2.4, this Phase I ESA complies with ASTM Standard E 1527-13.

6.2 General Site Setting

The subject site is located off Little Canoe Creek Road North near Steele, Etowah County, Alabama. The subject site was undeveloped on the date of the site visit. Adjacent properties appear to be mostly undeveloped and forested or utilized for agricultural purposes, with some residences sparsely located in adjacent properties.

6.3 Exterior Observations

On May 2, 2017, representatives of GMC conducted a reconnaissance at and within an approximate 1-mile radius around the subject site. GMC accessed the site from Little Canoe Creek Road North. GMC noted that the site appeared to be mostly undeveloped with some cleared areas. No structures were noted on the property during the site visit. There were no signs of distressed vegetation or stained soils on the subject property. No structures were noted on the date of the site visit; therefore, no interior observations were made.

6.4 Interior Observations

No structures were noted on the date of the site visit; therefore, no interior observations were made.

7.0 INTERVIEWS

The purpose of interviews is to obtain information indicating recognized environmental conditions in connection with the property.

7.1 Interview with User

A representative of GMC conducted an interview with a representative of the user, Ms. Sherrie Kelley, CAO for the Etowah County Commission (User). Ms. Kelley is unaware of any hazardous substances, spills, contamination, or environmental liens related to the site. The completed User questionnaire can be found attached in Appendix IV.

7.2 Interview with Owners

The Etowah County Commission is also the Owner of the property. Therefore, an additional owner interview was not conducted.

8.0 FINDINGS

The environmental conditions associated with the property include the following:

- GMC conducted an Environmental Data Resources review for the subject site based on the All Appropriate Inquiries (AAI) standard checklist with search distances relevant to each environmental database. This records review revealed no facilities within the relative search distance from the target property. Information regarding the records review is located in Section 5.1, 5.2, 9.4, and the EDR is attached as Appendix III.
- GMC conducted an EDR Aerial Photo Decade Package review and a Certified Sanborn Map Report review for the subject site to gain information on historical use of the property and its adjoining area. The Certified Sanborn Map Report did not find any maps covering the property, while the aerial package includes historical aerial photos taken in 1952, 1972, 1975, 1982, 1987, 1992, 1997, 2005, 2006, 2009, and 2011 (Appendix V). The first aerial photo in 1952 is somewhat unclear, but it appears that Parcels 1, 2, and 3 were all forested with mostly forested and some cleared surrounding areas. Parcel 4 was not included in the 1952 aerial. In the 1972 aerial, it appears that Parcel 2 was partially cleared. During this time some land was cleared north of Parcel 4. In 1982, land was cleared on Parcel 4 and a manmade lake was constructed north of this parcel. In 1997 it appears that a building was constructed on the adjacent property northeast of Parcel 1. The parcels and surrounding areas remain relatively unchanged until present day.
- On May 2, 2017, representatives of GMC conducted a reconnaissance at and within an approximate 1-mile radius around the subject site. GMC accessed the site from Little Canoe Creek Road North. GMC noted that the site appeared to be mostly undeveloped with some cleared areas. No structures were noted on the property during the site visit. There were no signs of distressed vegetation or stained soils on the subject property. No structures were noted on the date of the site visit; therefore, no interior observations were made.
- A representative of GMC conducted an interview with a representative of the user, Ms. Sherrie Kelley, CAO for the Etowah County Commission (User). Ms. Kelley is unaware of any hazardous substances, spills, contamination, or environmental liens related to the site. The completed User questionnaire can be found attached in Appendix IV. The Etowah County Commission is also the Owner of the property. Therefore, an additional owner interview was not conducted.
- De Minimis Conditions: None
- Recognized Environmental Conditions (RECs): None

- Controlled Recognized Environmental Conditions (CRECs): None
- Historical Recognized Environmental Conditions (HRECs): None

9.0 OPINIONS AND CONCLUSION

9.1 Opinions

In GMC's opinion, the subject site described in this report near Steele in Etowah County, Alabama (Figure 2), has not revealed evidence of any recognized environmental conditions and further investigation is not deemed necessary at this time. These opinions are based on the findings outlined in Section 8.0 and Section 9.4 of this report. It is our opinion that no further investigation is warranted on the property at this time.

9.2 Conclusion

In conclusion, GMC has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-13 for the subject sites, described in this report near Steele in Etowah County, Alabama (Figure 2), the *property*. Any exceptions to, or deletions from, this practice are described in Section 2.4 and Section 9.3 of this report. This assessment has revealed no evidence of *recognized environmental conditions* in connection with the *property*.

9.3 Deviations

Except for the limitations and exceptions discussed in Section 2.4, this Phase I ESA complies with ASTM Standard E 1527-13.

9.4 Additional Services

No additional services were performed in connection with this document.

10.0 REFERENCES

Environmental Data Resources, Inc., 6 Armstrong Road, 4th floor, Shelton, CT 06484, (800) 352-0050.

Gregory C. Johnson, Robert E. Kidd, Celeste A. Journey, Humbert Zappia, and J. Brian Atkins Environmental Setting and Water-Quality Issues of the Mobile River Basin, Alabama, Georgia, Mississippi, and Tennessee. 2002.

Southeast Regional Climate Center, 2014, Historical climate summaries for Alabama, http://www.sercc.com/climateinfo/historical/historical_al.html.

United States Department of Agriculture, Natural Resources Conservation Service. Hydric Soils of Etowah County, Alabama. 2005.

United States Department of Agriculture, Natural Resources Conservation Service. Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov/>

United States Geological Survey. Environmental Setting and Water-Quality Issues in the Lower Tennessee River Basin. Survey URL: <http://pubs.usgs.gov/wri/wri994080/text/envsetting.html#geology>.

United States Geological Survey. Steele, AL, 7.5' Series Quadrangle Map, 1947 (photo revised 1972).

11.0 QUALIFICATIONS AND SIGNATURES OF PROFESSIONALS

STATEMENT OF QUALIFICATIONS

We declare that, to the best of our professional knowledge and belief, we meet the definition of *environmental professionals* as defined in §312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the subject *property*. We have performed the all appropriate inquiries in conformance with the standards and practices set for in 40 CFR Part 312. GMC has conducted numerous environmental site assessments within Alabama and surrounding states. GMC's staff is well trained and has a Professional Engineer, a Registered Environmental Property Assessor (REPA), and a Professional Geologist conducting or overseeing the assessment of each project. The qualifications and experience of GMC staff are attached in Appendix VI.

CERTIFICATION

"I certify that this site assessment has been conducted in accordance with ASTM codes and in accordance with assessment practices conducted by similarly situated environmental professionals in this area. All information collected was reviewed and the collecting of information was overseen by a person qualified to conduct environmental site assessments. The information submitted herein, to the best of my knowledge and belief, is true, accurate, and complete."

Crystal Shurett
Environmental Scientist

Stuart Blackwell, P.W.S.
Environmental Department Head

Date

Date

**APPENDIX I
FIGURES**



REF. SHEET 2009 MICROSOFT VIRTUAL EARTH ROADS
 DESCRIPTION: ENVIRONMENTAL REVIEW

▶ **LITTLE CANOE CREEK
 INDUSTRIAL PARK**
 ATTALA, ETOWAH COUNTY, ALABAMA

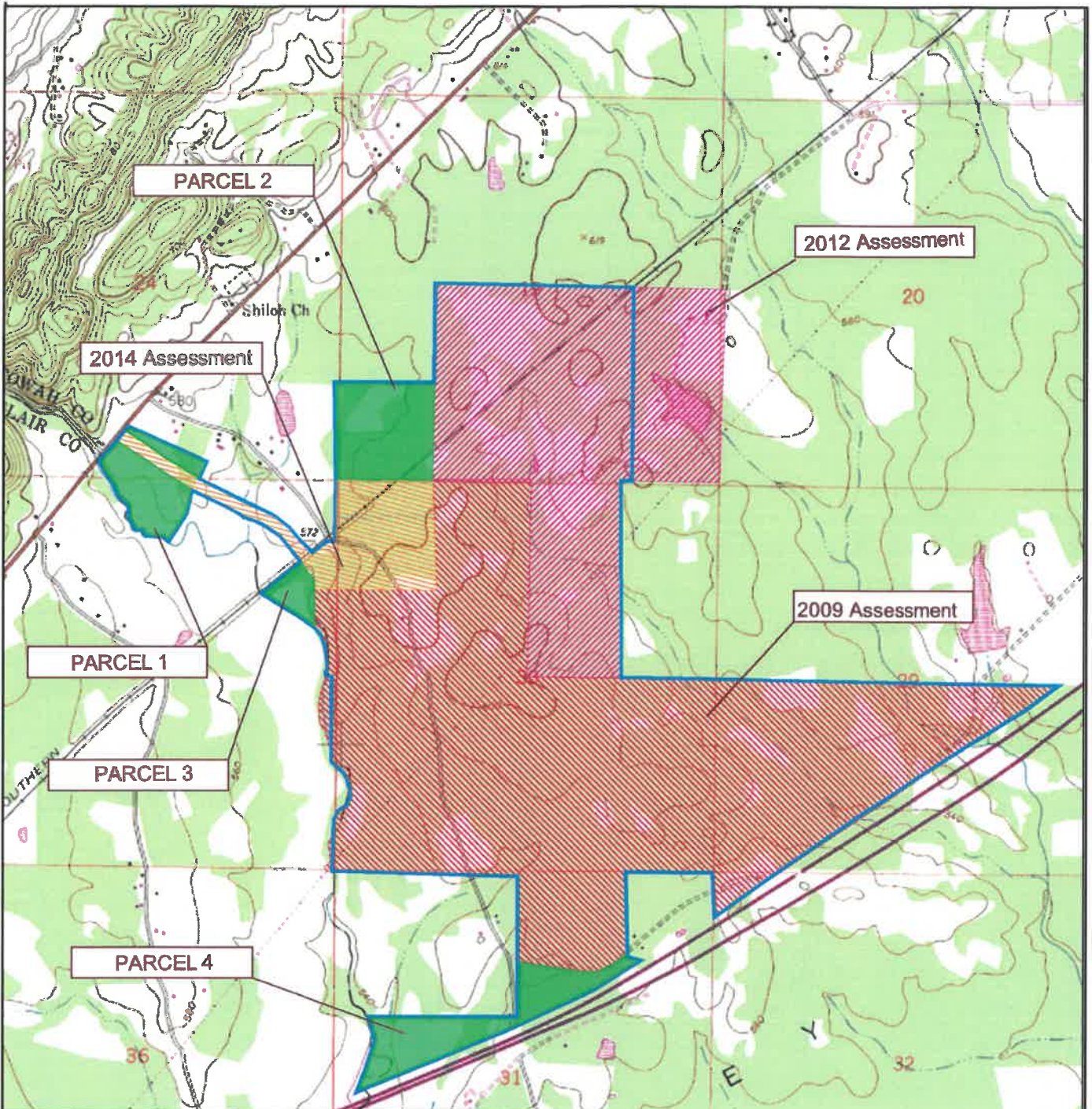
FIGURE 1

GENERAL LOCATION MAP
 GMC #EBHM16A004
 DATE: 5/8/2017
 DRAWN BY: CAS








GOODWYN | MILLS | CAWOOD

2701 1st Ave South, Suite 100 | Birmingham, AL 35233
 Tel 205.879.4462 | GMCNETWORK.COM



LEGEND

-  LITTLE CANOE CREEK OVERALL BOUNDARY
-  PROPERTY ASSESSED IN 2009
-  PROPERTY ASSESSED IN 2012
-  PROPERTY ASSESSED IN 2014
-  CURRENT ASSESSMENT (PARCELS 1-4)

NORTH

0 1,000 2,000 4,000

SCALE: 1" = 2,000'

REF. SHEET: USGS QUADRANGLE STEELE MAP
 DESCRIPTION: ENVIRONMENTAL REVIEW

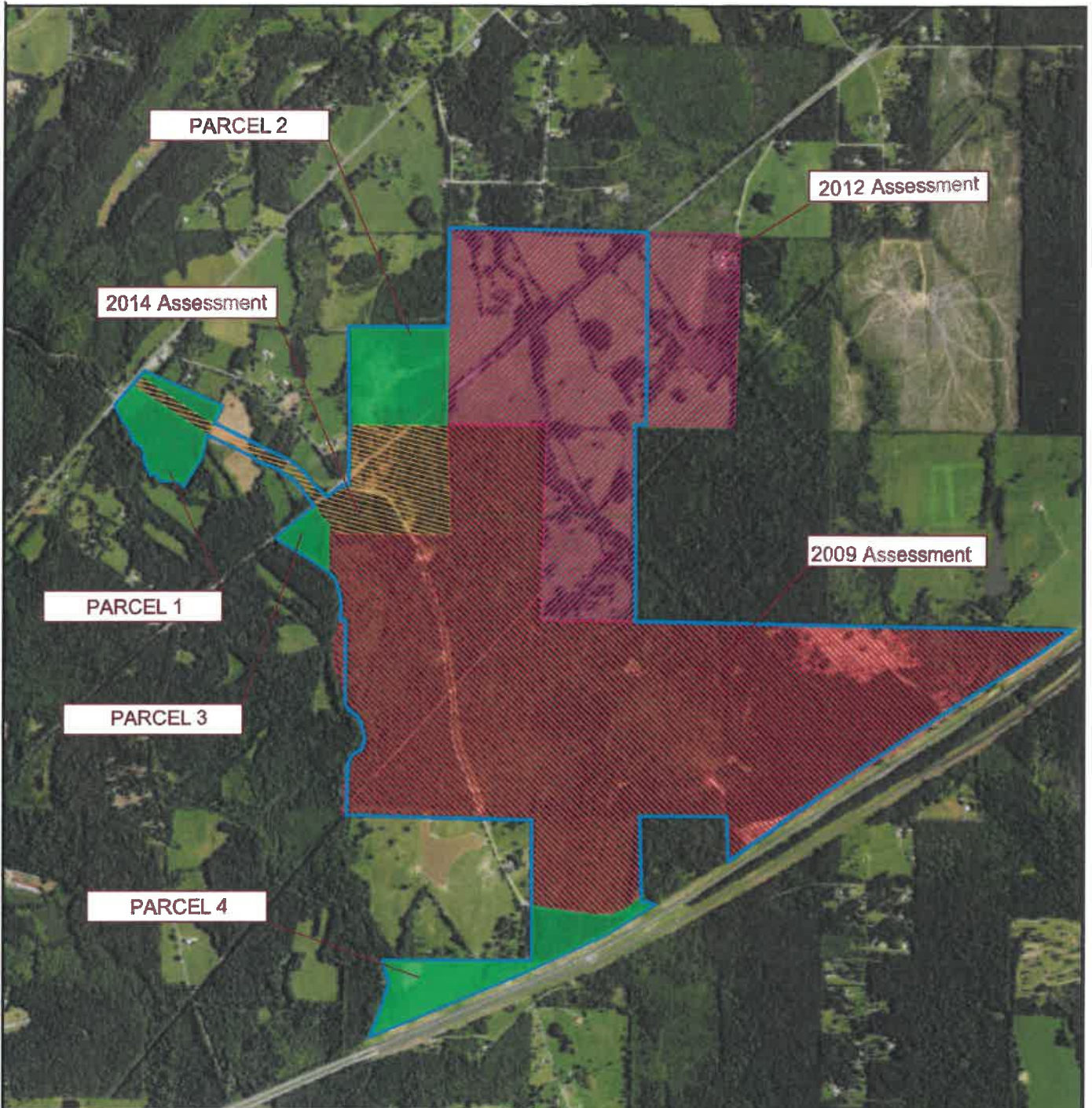
LITTLE CANOE CREEK INDUSTRIAL PARK
 ATTALLA, ETOWAH COUNTY, ALABAMA

FIGURE 2

USGS QUAD MAP
 GMC # EBHM170011
 DATE: 5/8/2017
 DRAWN BY: CAS

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LEGEND

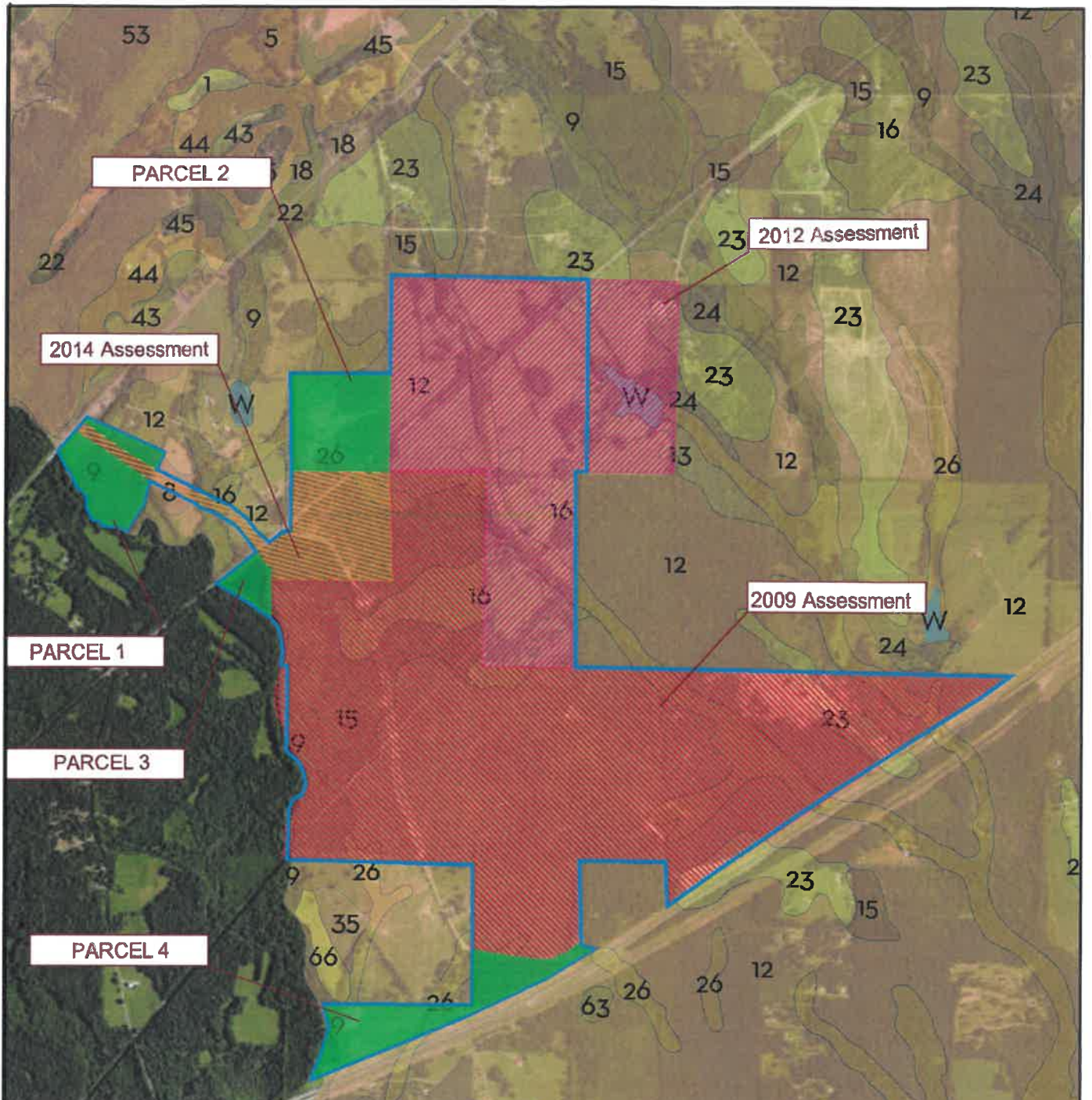
- LITTLE CANOE CREEK OVERALL BOUNDARY
- PROPERTY ASSESSED IN 2009
- PROPERTY ASSESSED IN 2012
- PROPERTY ASSESSED IN 2014
- CURRENT ASSESSMENT (PARCELS 1-4)

0 1,000 2,000 4,000
 NORTH **SCALE: 1" = 2,000'**

REF. SHEET: ESRI AERIAL IMAGERY
 DESCRIPTION: ENVIRONMENTAL REVIEW
LITTLE CANOE CREEK INDUSTRIAL PARK
 ATTALLA, ETOWAH COUNTY, ALABAMA


FIGURE 3
 AERIAL PHOTOGRAPH
 GMC # EBHM170011
 DATE: 5/8/2017
 DRAWN BY: CAS

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LEGEND

- LITTLE CANOE CREEK OVERALL BOUNDARY
- PROPERTY ASSESSED IN 2009
- PROPERTY ASSESSED IN 2012
- PROPERTY ASSESSED IN 2014
- CURRENT ASSESSMENT (PARCELS 1-4)



NORTH



SCALE: 1" = 2,000'

REF. SHEET: USDA ETOWAH COUNTY SOIL SURVEY
 DESCRIPTION: ENVIRONMENTAL REVIEW
LITTLE CANOE CREEK INDUSTRIAL PARK
 ATTALLA, ETOWAH COUNTY, ALABAMA

FIGURE 4
 SOILS MAP
 GMC # EBHM170011
 DATE: 5/8/2017
 DRAWN BY: CAS


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APPENDIX II
PHOTOS

P-1



General view of site conditions.

P-2



General view of site conditions.

P-3



General view of site conditions.

P-4



General view of site conditions.

P-5



General view of site conditions.

P-6



General view of site conditions.

P-7



General view of site conditions.

P-8



General view of site conditions.

P-9



View of wetlands on site.

P-10



View of wetlands on site.

P-11



General view of site conditions.

P-12



General view of site conditions.

GMC

P-13



General view of site conditions.

P-14



General view of site conditions.

GMC

P-15



View of stream on site.

P-16



General view of site conditions.



P-17



View of stream on site.

P-18



View of stream on site.

GMC

**APPENDIX III
EDR RADIUS MAP REPORT WITH
GEOCHECK**

Little Canoe Creek SW Parcel
2030 Canoe Creek Rd N
Attalla, AL 35954

Inquiry Number: 4930947.2s
May 08, 2017

The EDR Radius Map™ Report with GeoCheck®



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
Executive Summary	ES1
Overview Map	2
Detail Map	3
Map Findings Summary	4
Map Findings	8
Orphan Summary	9
Government Records Searched/Data Currency Tracking	GR-1
 <u>GEOCHECK ADDENDUM</u>	
Physical Setting Source Addendum	A-1
Physical Setting Source Summary	A-2
Physical Setting SSURGO Soil Map	A-5
Physical Setting Source Map	A-13
Physical Setting Source Map Findings	A-15
Physical Setting Source Records Searched	PSGR-1

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

2030 CANOE CREEK RD N
ATTALLA, AL 35954

COORDINATES

Latitude (North): 33.9475960 - 33° 56' 51.34"
Longitude (West): 86.1613900 - 86° 9' 41.00"
Universal Transverse Mercator: Zone 16
UTM X (Meters): 577494.1
UTM Y (Meters): 3756468.0
Elevation: 554 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 6698290 STEELE, AL
Version Date: 2014

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from: 20150710
Source: USDA

MAPPED SITES SUMMARY

Target Property Address:
2030 CANOE CREEK RD N
ATTALLA, AL 35954

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
--------	-----------	---------	-------------------	--------------------	----------------------------

NO MAPPED SITES FOUND

EXECUTIVE SUMMARY

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
NPL LIENS..... Federal Superfund Liens

Federal Delisted NPL site list

Delisted NPL..... National Priority List Deletions

Federal CERCLIS list

FEDERAL FACILITY..... Federal Facility Site Information listing
SEMS..... Superfund Enterprise Management System

Federal CERCLIS NFRAP site list

SEMS-ARCHIVE..... Superfund Enterprise Management System Archive

Federal RCRA CORRACTS facilities list

CORRACTS..... Corrective Action Report

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF..... RCRA - Treatment, Storage and Disposal

Federal RCRA generators list

RCRA-LQG..... RCRA - Large Quantity Generators
RCRA-SQG..... RCRA - Small Quantity Generators
RCRA-CESQG..... RCRA - Conditionally Exempt Small Quantity Generator

Federal institutional controls / engineering controls registries

LUCIS..... Land Use Control Information System
US ENG CONTROLS..... Engineering Controls Sites List

EXECUTIVE SUMMARY

US INST CONTROL..... Sites with Institutional Controls

Federal ERNS list

ERNS..... Emergency Response Notification System

State- and tribal - equivalent CERCLIS

SHWS..... Hazardous Substance Cleanup Fund

State and tribal landfill and/or solid waste disposal site lists

SWF/LF..... Permitted Landfills

State and tribal leaking storage tank lists

LUST..... Leaking Underground Storage Tank Listing

LAST..... List of AST Release Incidents

INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

State and tribal registered storage tank lists

FEMA UST..... Underground Storage Tank Listing

UST..... Underground Storage Tank Information

AST..... Aboveground Storage Tank Sites

INDIAN UST..... Underground Storage Tanks on Indian Land

State and tribal institutional control / engineering control registries

ENG CONTROLS..... Engineering Controls Site Listing

INST CONTROL..... Land Division Brownfields 128(a) Program Site Listing

AUL..... Environmental Covenants

State and tribal voluntary cleanup sites

VCP..... Cleanup Program Inventory

INDIAN VCP..... Voluntary Cleanup Priority Listing

State and tribal Brownfields sites

BROWNFIELDS..... Land Division Brownfields 128(a) Program Site Listing

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS..... A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

SWRCY..... Recycling/Recovered Materials Processors Directory

INDIAN ODI..... Report on the Status of Open Dumps on Indian Lands

ODI..... Open Dump Inventory

DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations

EXECUTIVE SUMMARY

IHS OPEN DUMPS..... Open Dumps on Indian Land

Local Lists of Hazardous waste / Contaminated Sites

AOCONCERN..... Area of Concern
US HIST CDL..... Delisted National Clandestine Laboratory Register
CDL..... Clandestine Methamphetamine Lab Sites
US CDL..... National Clandestine Laboratory Register

Local Lists of Registered Storage Tanks

HIST UST..... Underground Storage Tank Information

Local Land Records

LIENS 2..... CERCLA Lien Information

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System
SPILLS..... Emergency Response Data

Other Ascertainable Records

RCRA NonGen / NLR..... RCRA - Non Generators / No Longer Regulated
FUDS..... Formerly Used Defense Sites
DOD..... Department of Defense Sites
SCRD DRYCLEANERS..... State Coalition for Remediation of Drycleaners Listing
US FIN ASSUR..... Financial Assurance Information
EPA WATCH LIST..... EPA WATCH LIST
2020 COR ACTION..... 2020 Corrective Action Program List
TSCA..... Toxic Substances Control Act
TRIS..... Toxic Chemical Release Inventory System
SSTS..... Section 7 Tracking Systems
ROD..... Records Of Decision
RMP..... Risk Management Plans
RAATS..... RCRA Administrative Action Tracking System
PRP..... Potentially Responsible Parties
PADS..... PCB Activity Database System
ICIS..... Integrated Compliance Information System
FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
MLTS..... Material Licensing Tracking System
COAL ASH DOE..... Steam-Electric Plant Operation Data
COAL ASH EPA..... Coal Combustion Residues Surface Impoundments List
PCB TRANSFORMER..... PCB Transformer Registration Database
RADINFO..... Radiation Information Database
HIST FTTS..... FIFRA/TSCA Tracking System Administrative Case Listing
DOT OPS..... Incident and Accident Data
CONSENT..... Superfund (CERCLA) Consent Decrees
INDIAN RESERV..... Indian Reservations
FUSRAP..... Formerly Utilized Sites Remedial Action Program
UMTRA..... Uranium Mill Tailings Sites
LEAD SMELTERS..... Lead Smelter Sites
US AIRS..... Aerometric Information Retrieval System Facility Subsystem

EXECUTIVE SUMMARY

US MINES.....	Mines Master Index File
ABANDONED MINES.....	Abandoned Mines
FINDS.....	Facility Index System/Facility Registry System
UXO.....	Unexploded Ordnance Sites
DOCKET HWC.....	Hazardous Waste Compliance Docket Listing
ECHO.....	Enforcement & Compliance History Information
FUELS PROGRAM.....	EPA Fuels Program Registered Listing
COAL ASH.....	Coal Ash Disposal Sites
DRYCLEANERS.....	Drycleaner Facility Listing
Financial Assurance.....	Financial Assurance Information Listing
NPDES.....	NPDES Permit Listing
TIER 2.....	Tier 2 Data Listing
UIC.....	UIC Listing

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP.....	EDR Proprietary Manufactured Gas Plants
EDR Hist Auto.....	EDR Exclusive Historic Gas Stations
EDR Hist Cleaner.....	EDR Exclusive Historic Dry Cleaners

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA HWS.....	Recovered Government Archive State Hazardous Waste Facilities List
RGA LUST.....	Recovered Government Archive Leaking Underground Storage Tank

SURROUNDING SITES: SEARCH RESULTS

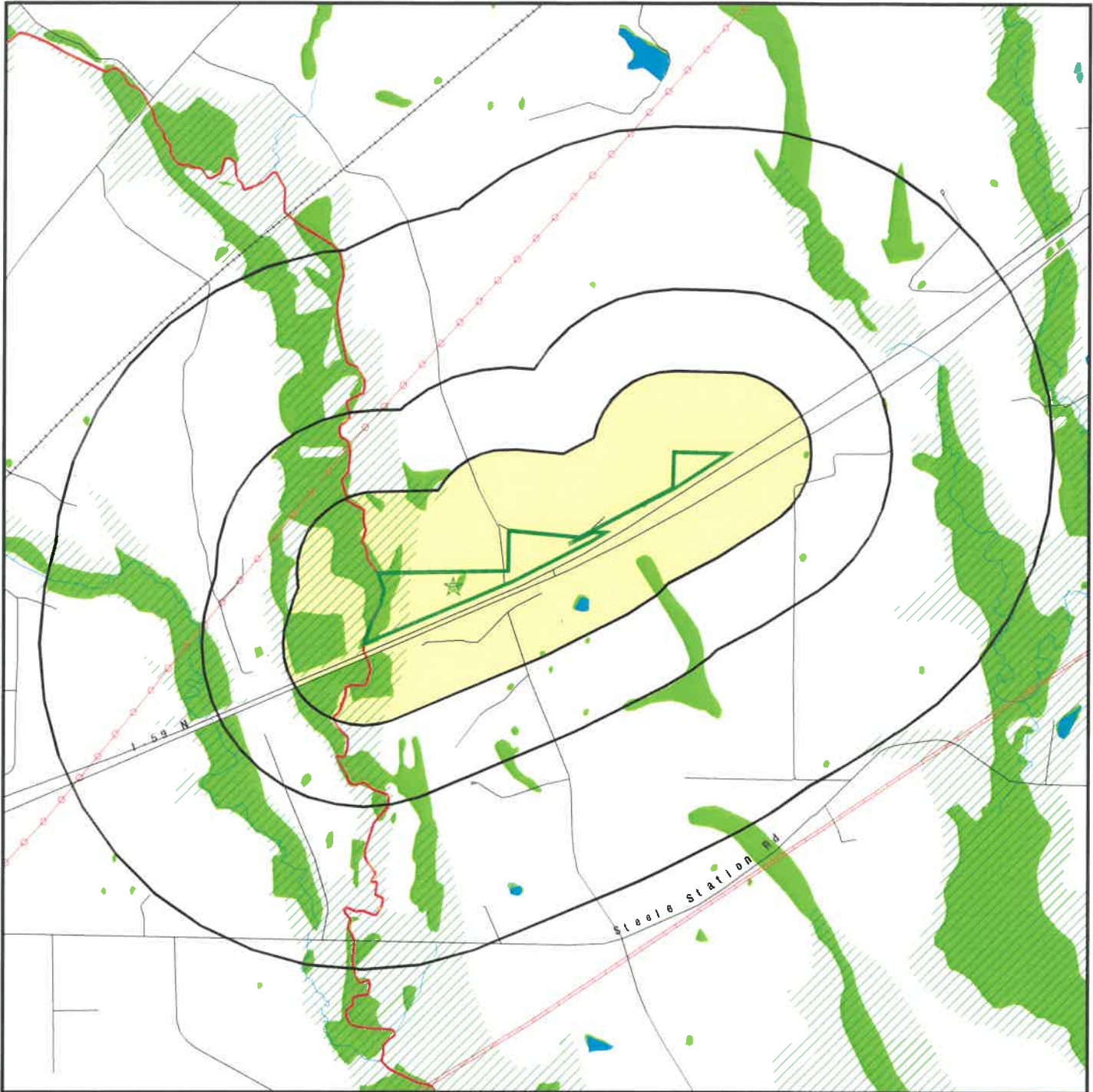
Surrounding sites were not identified.















Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

There were no unmapped sites in this report.

OVERVIEW MAP - 4930947.2S



-  Target Property
-  Sites at elevations higher than or equal to the target property
-  Sites at elevations lower than the target property
-  Manufactured Gas Plants
-  National Priority List Sites
-  Dept. Defense Sites
-  Indian Reservations BIA
-  County Boundary
-  Power transmission lines
-  Pipelines
-  100-year flood zone
-  500-year flood zone
-  National Wetland Inventory
-  Areas of Concern



This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Little Canoe Creek SW Parcel
ADDRESS: 2030 Canoe Creek Rd N
 Attalla AL 35954
LAT/LONG: 33.947596 / 86.16139

CLIENT: Goodwyn Mills & Cawood Envirn.
CONTACT: Crystal Shurett
INQUIRY #: 4930947.2s
DATE: May 08, 2017 7:39 pm

DETAIL MAP - 4930947.2S



- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- Sensitive Receptors
- National Priority List Sites
- Dept. Defense Sites
- Indian Reservations BIA
- County Boundary
- Power transmission lines
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory
- Areas of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

<p>SITE NAME: Little Canoe Creek SW Parcel ADDRESS: 2030 Canoe Creek Rd N Attalla AL 35954 LAT/LONG: 33.947596 / 86.16139</p>	<p>CLIENT: Goodwyn Mills & Cawood Envirn. CONTACT: Crystal Shurett INQUIRY #: 4930947.2s DATE: May 08, 2017 7:41 pm</p>
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MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENTAL RECORDS								
<i>Federal NPL site list</i>								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	0.001		0	NR	NR	NR	NR	0
<i>Federal Delisted NPL site list</i>								
Delisted NPL	1.000		0	0	0	0	NR	0
<i>Federal CERCLIS list</i>								
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
SEMS	0.500		0	0	0	NR	NR	0
<i>Federal CERCLIS NFRAP site list</i>								
SEMS-ARCHIVE	0.500		0	0	0	NR	NR	0
<i>Federal RCRA CORRACTS facilities list</i>								
CORRACTS	1.000		0	0	0	0	NR	0
<i>Federal RCRA non-CORRACTS TSD facilities list</i>								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
<i>Federal RCRA generators list</i>								
RCRA-LQG	0.250		0	0	NR	NR	NR	0
RCRA-SQG	0.250		0	0	NR	NR	NR	0
RCRA-CESQG	0.250		0	0	NR	NR	NR	0
<i>Federal institutional controls / engineering controls registries</i>								
LUCIS	0.500		0	0	0	NR	NR	0
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
<i>Federal ERNS list</i>								
ERNS	0.001		0	NR	NR	NR	NR	0
<i>State- and tribal - equivalent CERCLIS</i>								
SHWS	1.000		0	0	0	0	NR	0
<i>State and tribal landfill and/or solid waste disposal site lists</i>								
SWF/LF	0.500		0	0	0	NR	NR	0
<i>State and tribal leaking storage tank lists</i>								
LUST	0.500		0	0	0	NR	NR	0
LAST	0.500		0	0	0	NR	NR	0
INDIAN LUST	0.500		0	0	0	NR	NR	0
<i>State and tribal registered storage tank lists</i>								
FEMA UST	0.250		0	0	NR	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
UST	0.250		0	0	NR	NR	NR	0
AST	0.250		0	0	NR	NR	NR	0
INDIAN UST	0.250		0	0	NR	NR	NR	0
State and tribal institutional control / engineering control registries								
ENG CONTROLS	0.500		0	0	0	NR	NR	0
INST CONTROL	0.500		0	0	0	NR	NR	0
AUL	0.500		0	0	0	NR	NR	0
State and tribal voluntary cleanup sites								
VCP	0.500		0	0	0	NR	NR	0
INDIAN VCP	0.500		0	0	0	NR	NR	0
State and tribal Brownfields sites								
BROWNFIELDS	0.500		0	0	0	NR	NR	0
ADDITIONAL ENVIRONMENTAL RECORDS								
Local Brownfield lists								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
Local Lists of Landfill / Solid Waste Disposal Sites								
SWRCY	0.500		0	0	0	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
IHS OPEN DUMPS	0.500		0	0	0	NR	NR	0
Local Lists of Hazardous waste / Contaminated Sites								
AOCONCERN	1.000		0	0	0	0	NR	0
US HIST CDL	0.001		0	NR	NR	NR	NR	0
CDL	0.001		0	NR	NR	NR	NR	0
US CDL	0.001		0	NR	NR	NR	NR	0
Local Lists of Registered Storage Tanks								
HIST UST	0.250		0	0	NR	NR	NR	0
Local Land Records								
LIENS 2	0.001		0	NR	NR	NR	NR	0
Records of Emergency Release Reports								
HMIRS	0.001		0	NR	NR	NR	NR	0
SPILLS	0.001		0	NR	NR	NR	NR	0
Other Ascertainable Records								
RCRA NonGen / NLR	0.250		0	0	NR	NR	NR	0
FUDS	1.000		0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
DOD	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	NR	NR	0
US FIN ASSUR	0.001		0	NR	NR	NR	NR	0
EPA WATCH LIST	0.001		0	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
TSCA	0.001		0	NR	NR	NR	NR	0
TRIS	0.001		0	NR	NR	NR	NR	0
SSTS	0.001		0	NR	NR	NR	NR	0
ROD	1.000		0	0	0	0	NR	0
RMP	0.001		0	NR	NR	NR	NR	0
RAATS	0.001		0	NR	NR	NR	NR	0
PRP	0.001		0	NR	NR	NR	NR	0
PADS	0.001		0	NR	NR	NR	NR	0
ICIS	0.001		0	NR	NR	NR	NR	0
FTTS	0.001		0	NR	NR	NR	NR	0
MLTS	0.001		0	NR	NR	NR	NR	0
COAL ASH DOE	0.001		0	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
PCB TRANSFORMER	0.001		0	NR	NR	NR	NR	0
RADINFO	0.001		0	NR	NR	NR	NR	0
HIST FTTS	0.001		0	NR	NR	NR	NR	0
DOT OPS	0.001		0	NR	NR	NR	NR	0
CONSENT	1.000		0	0	0	0	NR	0
INDIAN RESERV	0.001		0	NR	NR	NR	NR	0
FUSRAP	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
LEAD SMELTERS	0.001		0	NR	NR	NR	NR	0
US AIRS	0.001		0	NR	NR	NR	NR	0
US MINES	0.250		0	0	NR	NR	NR	0
ABANDONED MINES	0.001		0	NR	NR	NR	NR	0
FINDS	0.001		0	NR	NR	NR	NR	0
UXO	1.000		0	0	0	0	NR	0
DOCKET HWC	0.001		0	NR	NR	NR	NR	0
ECHO	0.001		0	NR	NR	NR	NR	0
FUELS PROGRAM	0.250		0	0	NR	NR	NR	0
COAL ASH	0.500		0	0	0	NR	NR	0
DRYCLEANERS	0.250		0	0	NR	NR	NR	0
Financial Assurance	0.001		0	NR	NR	NR	NR	0
NPDES	0.001		0	NR	NR	NR	NR	0
TIER 2	0.001		0	NR	NR	NR	NR	0
UIC	0.001		0	NR	NR	NR	NR	0

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP	1.000		0	0	0	0	NR	0
EDR Hist Auto	0.125		0	NR	NR	NR	NR	0
EDR Hist Cleaner	0.125		0	NR	NR	NR	NR	0

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA HWS	0.001		0	NR	NR	NR	NR	0
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MAP FINDINGS SUMMARY

<u>Database</u>	<u>Search Distance (Miles)</u>	<u>Target Property</u>	<u>< 1/8</u>	<u>1/8 - 1/4</u>	<u>1/4 - 1/2</u>	<u>1/2 - 1</u>	<u>> 1</u>	<u>Total Plotted</u>
RGA LUST	0.001		0	NR	NR	NR	NR	0
- Totals --		0	0	0	0	0	0	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Map ID
Direction
Distance
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number
EPA ID Number

NO SITES FOUND

Count: 0 records.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
NO SITES FOUND					

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 12/05/2016	Source: EPA
Date Data Arrived at EDR: 01/05/2017	Telephone: N/A
Date Made Active in Reports: 02/03/2017	Last EDR Contact: 04/21/2017
Number of Days to Update: 29	Next Scheduled EDR Contact: 07/17/2017
	Data Release Frequency: Quarterly

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 6
Telephone: 214-655-6659

EPA Region 3
Telephone 215-814-5418

EPA Region 7
Telephone: 913-551-7247

EPA Region 4
Telephone 404-562-8033

EPA Region 8
Telephone: 303-312-6774

EPA Region 5
Telephone 312-886-6686

EPA Region 9
Telephone: 415-947-4246

EPA Region 10
Telephone 206-553-8665

Proposed NPL: Proposed National Priority List Sites

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 12/05/2016	Source: EPA
Date Data Arrived at EDR: 01/05/2017	Telephone: N/A
Date Made Active in Reports: 02/03/2017	Last EDR Contact: 04/21/2017
Number of Days to Update: 29	Next Scheduled EDR Contact: 07/17/2017
	Data Release Frequency: Quarterly

NPL LIENS: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991	Source: EPA
Date Data Arrived at EDR: 02/02/1994	Telephone: 202-564-4267
Date Made Active in Reports: 03/30/1994	Last EDR Contact: 08/15/2011
Number of Days to Update: 56	Next Scheduled EDR Contact: 11/28/2011
	Data Release Frequency: No Update Planned

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Federal Delisted NPL site list

Delisted NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 12/05/2016	Source: EPA
Date Data Arrived at EDR: 01/05/2017	Telephone: N/A
Date Made Active in Reports: 02/03/2017	Last EDR Contact: 04/21/2017
Number of Days to Update: 29	Next Scheduled EDR Contact: 07/17/2017
	Data Release Frequency: Quarterly

Federal CERCLIS list

FEDERAL FACILITY: Federal Facility Site Information listing

A listing of National Priority List (NPL) and Base Realignment and Closure (BRAC) sites found in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Database where EPA Federal Facilities Restoration and Reuse Office is involved in cleanup activities.

Date of Government Version: 11/07/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 01/05/2017	Telephone: 703-603-8704
Date Made Active in Reports: 04/07/2017	Last EDR Contact: 04/07/2017
Number of Days to Update: 92	Next Scheduled EDR Contact: 07/17/2017
	Data Release Frequency: Varies

SEMS: Superfund Enterprise Management System

SEMS (Superfund Enterprise Management System) tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of EPA's Superfund Program across the United States. The list was formerly know as CERCLIS, renamed to SEMS by the EPA in 2015. The list contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This dataset also contains sites which are either proposed to or on the National Priorities List (NPL) and the sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 02/07/2017	Source: EPA
Date Data Arrived at EDR: 04/19/2017	Telephone: 800-424-9346
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/21/2017
Number of Days to Update: 16	Next Scheduled EDR Contact: 07/31/2017
	Data Release Frequency: Quarterly

Federal CERCLIS NFRAP site list

SEMS-ARCHIVE: Superfund Enterprise Management System Archive

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

SEMS-ARCHIVE (Superfund Enterprise Management System Archive) tracks sites that have no further interest under the Federal Superfund Program based on available information. The list was formerly known as the CERCLIS-NFRAP, renamed to SEMS ARCHIVE by the EPA in 2015. EPA may perform a minimal level of assessment work at a site while it is archived if site conditions change and/or new information becomes available. Archived sites have been removed and archived from the inventory of SEMS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list the site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be potential NPL site.

Date of Government Version: 02/07/2017	Source: EPA
Date Data Arrived at EDR: 04/19/2017	Telephone: 800-424-9346
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/25/2017
Number of Days to Update: 16	Next Scheduled EDR Contact: 07/31/2017
	Data Release Frequency: Quarterly

Federal RCRA CORRACTS facilities list

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 12/12/2016	Source: EPA
Date Data Arrived at EDR: 12/28/2016	Telephone: 800-424-9346
Date Made Active in Reports: 02/10/2017	Last EDR Contact: 05/02/2017
Number of Days to Update: 44	Next Scheduled EDR Contact: 04/10/2017
	Data Release Frequency: Quarterly

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF: RCRA - Treatment, Storage and Disposal

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 12/12/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 12/28/2016	Telephone: (404) 562-8651
Date Made Active in Reports: 02/10/2017	Last EDR Contact: 05/02/2017
Number of Days to Update: 44	Next Scheduled EDR Contact: 04/10/2017
	Data Release Frequency: Quarterly

Federal RCRA generators list

RCRA-LQG: RCRA - Large Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 12/12/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 12/28/2016	Telephone: (404) 562-8651
Date Made Active in Reports: 02/10/2017	Last EDR Contact: 05/02/2017
Number of Days to Update: 44	Next Scheduled EDR Contact: 04/10/2017
	Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

RCRA-SQG: RCRA - Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 12/12/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 12/28/2016	Telephone: (404) 562-8651
Date Made Active in Reports: 02/10/2017	Last EDR Contact: 05/02/2017
Number of Days to Update: 44	Next Scheduled EDR Contact: 04/10/2017
	Data Release Frequency: Quarterly

RCRA-CESQG: RCRA - Conditionally Exempt Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 12/12/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 12/28/2016	Telephone: (404) 562-8651
Date Made Active in Reports: 02/10/2017	Last EDR Contact: 05/02/2017
Number of Days to Update: 44	Next Scheduled EDR Contact: 04/10/2017
	Data Release Frequency: Varies

Federal institutional controls / engineering controls registries

LUCIS: Land Use Control Information System

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 12/28/2016	Source: Department of the Navy
Date Data Arrived at EDR: 01/04/2017	Telephone: 843-820-7326
Date Made Active in Reports: 04/07/2017	Last EDR Contact: 02/13/2017
Number of Days to Update: 93	Next Scheduled EDR Contact: 05/29/2017
	Data Release Frequency: Varies

US ENG CONTROLS: Engineering Controls Sites List

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 11/15/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 11/29/2016	Telephone: 703-603-0695
Date Made Active in Reports: 02/03/2017	Last EDR Contact: 02/28/2017
Number of Days to Update: 66	Next Scheduled EDR Contact: 06/12/2017
	Data Release Frequency: Varies

US INST CONTROL: Sites with Institutional Controls

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 11/15/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 11/29/2016	Telephone: 703-603-0695
Date Made Active in Reports: 02/03/2017	Last EDR Contact: 02/28/2017
Number of Days to Update: 66	Next Scheduled EDR Contact: 06/12/2017
	Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Federal ERNS list

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 09/26/2016	Source: National Response Center, United States Coast Guard
Date Data Arrived at EDR: 09/29/2016	Telephone: 202-267-2180
Date Made Active in Reports: 11/11/2016	Last EDR Contact: 03/29/2017
Number of Days to Update: 43	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Annually

State- and tribal - equivalent CERCLIS

SHWS: Hazardous Substance Cleanup Fund

Hazardous substance sites, which pose a threat to public health and the environment, which will be cleaned up utilizing the Hazardous Substance Cleanup Fund.

Date of Government Version: 12/06/2016	Source: Department of Environmental Management
Date Data Arrived at EDR: 12/20/2016	Telephone: 334-271-7984
Date Made Active in Reports: 02/02/2017	Last EDR Contact: 03/09/2017
Number of Days to Update: 44	Next Scheduled EDR Contact: 06/26/2017
	Data Release Frequency: Semi-Annually

HWS DETAIL: Alabama Hazardous Substance Cleanup Fund Annual Report

The Alabama Hazardous Substance Cleanup Fund (AHSCF) was established in 1989 by act of the Alabama Legislature (Code of Alabama 1975, ?22-30A) to provide a mechanism for ADEM to investigate, remediate, and monitor hazardous substance sites. These sites may potentially endanger human health and the environment, but may not qualify to be addressed by other federal or state cleanup programs.

Date of Government Version: 12/31/2015	Source: Department of Environmental Management
Date Data Arrived at EDR: 09/16/2016	Telephone: 334-271-7730
Date Made Active in Reports: 09/21/2016	Last EDR Contact: 03/13/2017
Number of Days to Update: 5	Next Scheduled EDR Contact: 06/26/2017
	Data Release Frequency: Annually

State and tribal landfill and/or solid waste disposal site lists

SWF/LF: Permitted Landfills

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 10/23/2015	Source: Department of Environmental Management
Date Data Arrived at EDR: 01/15/2016	Telephone: 334-271-7730
Date Made Active in Reports: 02/11/2016	Source: Department of Environmental Management, GIS Section
Number of Days to Update: 27	Telephone: 334-271-7700
	Last EDR Contact: 04/14/2017
	Next Scheduled EDR Contact: 07/24/2017
	Data Release Frequency: Annually

State and tribal leaking storage tank lists

LUST: Leaking Underground Storage Tank Listing

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 12/01/2016	Source: Department of Environmental Management
Date Data Arrived at EDR: 12/28/2016	Telephone: 334-270-5655
Date Made Active in Reports: 02/02/2017	Last EDR Contact: 03/27/2017
Number of Days to Update: 36	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

LAST: List of AST Release Incidents

A listing of aboveground storage tank releases that have been reported to ADEM. These are primarily smaller retail ASTs and smaller bulk plant ASTs.

Date of Government Version: 12/01/2016	Source: Department of Environmental Management
Date Data Arrived at EDR: 12/28/2016	Telephone: 334-271-7712
Date Made Active in Reports: 02/02/2017	Last EDR Contact: 03/27/2017
Number of Days to Update: 36	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Varies

INDIAN LUST R5: Leaking Underground Storage Tanks on Indian Land

Leaking underground storage tanks located on Indian Land in Michigan, Minnesota and Wisconsin.

Date of Government Version: 11/14/2016	Source: EPA, Region 5
Date Data Arrived at EDR: 01/26/2017	Telephone: 312-886-7439
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Varies

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 10/07/2016	Source: EPA Region 10
Date Data Arrived at EDR: 01/26/2017	Telephone: 206-553-2857
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Quarterly

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 10/17/2016	Source: EPA Region 8
Date Data Arrived at EDR: 01/26/2017	Telephone: 303-312-6271
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Quarterly

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 10/06/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 01/26/2017	Telephone: 415-972-3372
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Quarterly

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land

A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 11/14/2016	Source: EPA Region 1
Date Data Arrived at EDR: 01/26/2017	Telephone: 617-918-1313
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Varies

INDIAN LUST R4: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Florida, Mississippi and North Carolina.

Date of Government Version: 10/14/2016	Source: EPA Region 4
Date Data Arrived at EDR: 01/27/2017	Telephone: 404-562-8677
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 98	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Semi-Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 10/01/2016	Source: EPA Region 6
Date Data Arrived at EDR: 01/26/2017	Telephone: 214-665-6597
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Varies

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 09/01/2016	Source: EPA Region 7
Date Data Arrived at EDR: 01/26/2017	Telephone: 913-551-7003
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Varies

State and tribal registered storage tank lists

FEMA UST: Underground Storage Tank Listing

A listing of all FEMA owned underground storage tanks.

Date of Government Version: 01/01/2010	Source: FEMA
Date Data Arrived at EDR: 02/16/2010	Telephone: 202-646-5797
Date Made Active in Reports: 04/12/2010	Last EDR Contact: 04/11/2017
Number of Days to Update: 55	Next Scheduled EDR Contact: 07/24/2017
	Data Release Frequency: Varies

UST: Underground Storage Tank Information

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 01/27/2017	Source: Department of Environmental Management
Date Data Arrived at EDR: 03/29/2017	Telephone: 334-270-5655
Date Made Active in Reports: 04/20/2017	Last EDR Contact: 03/29/2017
Number of Days to Update: 22	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Quarterly

AST: Aboveground Storage Tank Sites

Aboveground storage tank locations.

Date of Government Version: 01/27/2017	Source: Department of Environmental Management
Date Data Arrived at EDR: 03/29/2017	Telephone: 334-271-7926
Date Made Active in Reports: 04/20/2017	Last EDR Contact: 03/29/2017
Number of Days to Update: 22	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Quarterly

INDIAN UST R1: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 1 (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont and ten Tribal Nations).

Date of Government Version: 11/14/2016	Source: EPA, Region 1
Date Data Arrived at EDR: 01/26/2017	Telephone: 617-918-1313
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN UST R4: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 4 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee and Tribal Nations)

Date of Government Version: 10/14/2016	Source: EPA Region 4
Date Data Arrived at EDR: 01/27/2017	Telephone: 404-562-9424
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 98	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Semi-Annually

INDIAN UST R5: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 5 (Michigan, Minnesota and Wisconsin and Tribal Nations).

Date of Government Version: 01/14/2017	Source: EPA Region 5
Date Data Arrived at EDR: 01/26/2017	Telephone: 312-886-6136
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Varies

INDIAN UST R6: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 6 (Louisiana, Arkansas, Oklahoma, New Mexico, Texas and 65 Tribes).

Date of Government Version: 10/01/2016	Source: EPA Region 6
Date Data Arrived at EDR: 01/26/2017	Telephone: 214-665-7591
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Semi-Annually

INDIAN UST R7: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 7 (Iowa, Kansas, Missouri, Nebraska, and 9 Tribal Nations).

Date of Government Version: 09/01/2016	Source: EPA Region 7
Date Data Arrived at EDR: 01/26/2017	Telephone: 913-551-7003
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Varies

INDIAN UST R8: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming and 27 Tribal Nations).

Date of Government Version: 10/17/2016	Source: EPA Region 8
Date Data Arrived at EDR: 01/26/2017	Telephone: 303-312-6137
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Quarterly

INDIAN UST R9: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 9 (Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations).

Date of Government Version: 10/06/2016	Source: EPA Region 9
Date Data Arrived at EDR: 01/26/2017	Telephone: 415-972-3368
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN UST R10: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 10 (Alaska, Idaho, Oregon, Washington, and Tribal Nations).

Date of Government Version: 10/07/2016	Source: EPA Region 10
Date Data Arrived at EDR: 01/26/2017	Telephone: 206-553-2857
Date Made Active in Reports: 05/05/2017	Last EDR Contact: 04/28/2017
Number of Days to Update: 99	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Quarterly

State and tribal institutional control / engineering control registries

ENG CONTROLS: Engineering Controls Site Listing

A listing of sites with engineering controls included in the Land Division Cleanup Program Inventory listing.

Date of Government Version: 08/24/2009	Source: Department of Environmental Management
Date Data Arrived at EDR: 08/26/2009	Telephone: 334-271-7735
Date Made Active in Reports: 09/11/2009	Last EDR Contact: 03/09/2017
Number of Days to Update: 16	Next Scheduled EDR Contact: 06/26/2017
	Data Release Frequency: Varies

INST CONTROL: Land Division Brownfields 128(a) Program Site Listing

Institutional Controls (ICs) are non-engineered instruments, such as administrative and/or legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of a remedy by limiting land or resource use. There are five different types of controls. These are governmental, proprietary, enforcement tools with IC components, informational devices and unrestricted. Unrestricted- No institutional controls (unrestricted for industrial and residential use). Governmental- controls implemented and enforced by state and local governments. (zoning restrictions, ordinances, building permits, etc.). Proprietary- controls which have their basis in real property law (easements, covenants). Enforcement and Permit Tools with IC components- these controls are issued to compel land owners to limit certain site activities on both federal and private sites. Informational devices- informational tools with provide information or notification that residual or capped contamination may remain on site (deed or hazard notices).

Date of Government Version: 08/24/2009	Source: Department of Environmental Management
Date Data Arrived at EDR: 08/26/2009	Telephone: 334-271-7735
Date Made Active in Reports: 09/11/2009	Last EDR Contact: 03/14/2016
Number of Days to Update: 16	Next Scheduled EDR Contact: 06/27/2016
	Data Release Frequency: Varies

AUL: Environmental Covenants

An environmental covenant is required for a site if the approved environmental response project plan places a land use control on the site because it is not being remediated to unrestricted use.

Date of Government Version: 01/18/2017	Source: Department of Environmental Management
Date Data Arrived at EDR: 01/24/2017	Telephone: 334-279-3053
Date Made Active in Reports: 02/02/2017	Last EDR Contact: 03/23/2017
Number of Days to Update: 9	Next Scheduled EDR Contact: 06/26/2017
	Data Release Frequency: Varies

State and tribal voluntary cleanup sites

VCP: Cleanup Program Inventory

Currently the Cleanup Inventory List contains information about sites undergoing assessment and possible cleanup under Alabama's Brownfield Redevelopment and Voluntary Cleanup Program. It also includes sites that have exited the program but were remediated to less than unrestricted levels.

Date of Government Version: 08/31/2016	Source: Department of Environmental Management
Date Data Arrived at EDR: 09/15/2016	Telephone: 334-271-7700
Date Made Active in Reports: 09/19/2016	Last EDR Contact: 03/09/2017
Number of Days to Update: 4	Next Scheduled EDR Contact: 06/26/2017
	Data Release Frequency: Semi-Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN VCP R1: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 1.

Date of Government Version: 07/27/2015	Source: EPA, Region 1
Date Data Arrived at EDR: 09/29/2015	Telephone: 617-918-1102
Date Made Active in Reports: 02/18/2016	Last EDR Contact: 03/27/2017
Number of Days to Update: 142	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Varies

INDIAN VCP R7: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 7.

Date of Government Version: 03/20/2008	Source: EPA, Region 7
Date Data Arrived at EDR: 04/22/2008	Telephone: 913-551-7365
Date Made Active in Reports: 05/19/2008	Last EDR Contact: 04/20/2009
Number of Days to Update: 27	Next Scheduled EDR Contact: 07/20/2009
	Data Release Frequency: Varies

State and tribal Brownfields sites

BROWNFIELDS: Land Division Brownfields 128(a) Program Site Listing

A listing of Brownfields activities performed by ADEM.

Date of Government Version: 08/31/2016	Source: Department of Environmental Management
Date Data Arrived at EDR: 09/15/2016	Telephone: 334-271-7735
Date Made Active in Reports: 09/19/2016	Last EDR Contact: 03/09/2017
Number of Days to Update: 4	Next Scheduled EDR Contact: 06/26/2017
	Data Release Frequency: Varies

BROWNFIELDS 2: Directory of Brownfields Sites

The directory provides a brief look at sites being marketed as brownfields.

Date of Government Version: 04/01/2011	Source: Department of Environmental Management
Date Data Arrived at EDR: 06/16/2011	Telephone: 334-271-7735
Date Made Active in Reports: 07/26/2011	Last EDR Contact: 03/09/2017
Number of Days to Update: 40	Next Scheduled EDR Contact: 06/26/2017
	Data Release Frequency: Varies

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS: A Listing of Brownfields Sites

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. Assessment, Cleanup and Redevelopment Exchange System (ACRES) stores information reported by EPA Brownfields grant recipients on brownfields properties assessed or cleaned up with grant funding as well as information on Targeted Brownfields Assessments performed by EPA Regions. A listing of ACRES Brownfield sites is obtained from Cleanups in My Community. Cleanups in My Community provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

Date of Government Version: 03/02/2017	Source: Environmental Protection Agency
Date Data Arrived at EDR: 03/02/2017	Telephone: 202-566-2777
Date Made Active in Reports: 04/07/2017	Last EDR Contact: 03/02/2017
Number of Days to Update: 36	Next Scheduled EDR Contact: 07/03/2017
	Data Release Frequency: Semi-Annually

Local Lists of Landfill / Solid Waste Disposal Sites

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

SWRCY: Recycling/Recovered Materials Processors Directory

A listing of recycling facilities.

Date of Government Version: 09/01/2009
Date Data Arrived at EDR: 01/22/2010
Date Made Active in Reports: 02/05/2010
Number of Days to Update: 14

Source: Department of Economic & Community Affairs
Telephone: 334-242-5336
Last EDR Contact: 04/10/2017
Next Scheduled EDR Contact: 07/24/2017
Data Release Frequency: Varies

INDIAN ODI: Report on the Status of Open Dumps on Indian Lands

Location of open dumps on Indian land.

Date of Government Version: 12/31/1998
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 52

Source: Environmental Protection Agency
Telephone: 703-308-8245
Last EDR Contact: 05/01/2017
Next Scheduled EDR Contact: 08/14/2017
Data Release Frequency: Varies

ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/1985
Date Data Arrived at EDR: 08/09/2004
Date Made Active in Reports: 09/17/2004
Number of Days to Update: 39

Source: Environmental Protection Agency
Telephone: 800-424-9346
Last EDR Contact: 06/09/2004
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

DEBRIS REGION 9: Torres Martinez Reservation Illegal Dump Site Locations

A listing of illegal dump sites location on the Torres Martinez Indian Reservation located in eastern Riverside County and northern Imperial County, California.

Date of Government Version: 01/12/2009
Date Data Arrived at EDR: 05/07/2009
Date Made Active in Reports: 09/21/2009
Number of Days to Update: 137

Source: EPA, Region 9
Telephone: 415-947-4219
Last EDR Contact: 04/24/2017
Next Scheduled EDR Contact: 08/07/2017
Data Release Frequency: No Update Planned

IHS OPEN DUMPS: Open Dumps on Indian Land

A listing of all open dumps located on Indian Land in the United States.

Date of Government Version: 04/01/2014
Date Data Arrived at EDR: 08/06/2014
Date Made Active in Reports: 01/29/2015
Number of Days to Update: 176

Source: Department of Health & Human Services, Indian Health Service
Telephone: 301-443-1452
Last EDR Contact: 05/05/2017
Next Scheduled EDR Contact: 08/14/2017
Data Release Frequency: Varies

Local Lists of Hazardous waste / Contaminated Sites

AOCONCERN: Area of Concern

Property boundary of the Redstone Arsenal facility.

Date of Government Version: 09/01/2008
Date Data Arrived at EDR: 09/24/2008
Date Made Active in Reports: 10/23/2009
Number of Days to Update: 394

Source: Department of the Army
Telephone: 256-313-3255
Last EDR Contact: 05/01/2017
Next Scheduled EDR Contact: 08/14/2017
Data Release Frequency: No Update Planned

US HIST CDL: National Clandestine Laboratory Register

A listing of clandestine drug lab locations that have been removed from the DEAs National Clandestine Laboratory Register.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/30/2016
Date Data Arrived at EDR: 01/05/2017
Date Made Active in Reports: 02/10/2017
Number of Days to Update: 36

Source: Drug Enforcement Administration
Telephone: 202-307-1000
Last EDR Contact: 02/28/2017
Next Scheduled EDR Contact: 06/12/2017
Data Release Frequency: No Update Planned

CDL: Clandestine Methamphetamine Lab Sites

Clandestine methamphetamine lab locations seized by law enforcement agencies.

Date of Government Version: 12/09/2010
Date Data Arrived at EDR: 02/08/2011
Date Made Active in Reports: 02/28/2011
Number of Days to Update: 20

Source: Department of Environmental Management.
Telephone: 334-271-7700
Last EDR Contact: 05/01/2017
Next Scheduled EDR Contact: 08/14/2017
Data Release Frequency: Varies

US CDL: Clandestine Drug Labs

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 09/30/2016
Date Data Arrived at EDR: 12/05/2016
Date Made Active in Reports: 02/10/2017
Number of Days to Update: 67

Source: Drug Enforcement Administration
Telephone: 202-307-1000
Last EDR Contact: 02/28/2017
Next Scheduled EDR Contact: 06/12/2017
Data Release Frequency: Quarterly

Local Lists of Registered Storage Tanks

HIST UST: Underground Storage Tank Information

Storage tank sites removed from the UST database are added to the HIST UST database.

Date of Government Version: 01/14/2016
Date Data Arrived at EDR: 03/30/2016
Date Made Active in Reports: 05/13/2016
Number of Days to Update: 44

Source: Department of Environmental Management
Telephone: 334-271-7759
Last EDR Contact: 03/29/2017
Next Scheduled EDR Contact: 07/10/2017
Data Release Frequency: Varies

Local Land Records

LIENS 2: CERCLA Lien Information

A Federal CERCLA ("Superfund") lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Date of Government Version: 02/18/2014
Date Data Arrived at EDR: 03/18/2014
Date Made Active in Reports: 04/24/2014
Number of Days to Update: 37

Source: Environmental Protection Agency
Telephone: 202-564-6023
Last EDR Contact: 04/21/2017
Next Scheduled EDR Contact: 08/07/2017
Data Release Frequency: Varies

Records of Emergency Release Reports

HMIRS: Hazardous Materials Information Reporting System

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 12/28/2016
Date Data Arrived at EDR: 12/28/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 37

Source: U.S. Department of Transportation
Telephone: 202-366-4555
Last EDR Contact: 03/29/2017
Next Scheduled EDR Contact: 07/10/2017
Data Release Frequency: Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

SPILLS: Emergency Response Data

Incidents involving spills of oil and hazardous materials.

Date of Government Version: 12/05/2016	Source: Department of Environmental Management
Date Data Arrived at EDR: 12/28/2016	Telephone: 334-394-4382
Date Made Active in Reports: 02/02/2017	Last EDR Contact: 03/24/2017
Number of Days to Update: 36	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Varies

Other Ascertainable Records

RCRA NonGen / NLR: RCRA - Non Generators / No Longer Regulated

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 12/12/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 12/28/2016	Telephone: (404) 562-8651
Date Made Active in Reports: 02/10/2017	Last EDR Contact: 05/02/2017
Number of Days to Update: 44	Next Scheduled EDR Contact: 04/10/2017
	Data Release Frequency: Varies

FUDS: Formerly Used Defense Sites

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 01/31/2015	Source: U.S. Army Corps of Engineers
Date Data Arrived at EDR: 07/08/2015	Telephone: 202-528-4285
Date Made Active in Reports: 10/13/2015	Last EDR Contact: 02/24/2017
Number of Days to Update: 97	Next Scheduled EDR Contact: 06/05/2017
	Data Release Frequency: Varies

DOD: Department of Defense Sites

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 12/31/2005	Source: USGS
Date Data Arrived at EDR: 11/10/2006	Telephone: 888-275-8747
Date Made Active in Reports: 01/11/2007	Last EDR Contact: 04/14/2017
Number of Days to Update: 62	Next Scheduled EDR Contact: 07/24/2017
	Data Release Frequency: Semi-Annually

FEDLAND: Federal and Indian Lands

Federally and Indian administrated lands of the United States. Lands included are administrated by: Army Corps of Engineers, Bureau of Reclamation, National Wild and Scenic River, National Wildlife Refuge, Public Domain Land, Wilderness, Wilderness Study Area, Wildlife Management Area, Bureau of Indian Affairs, Bureau of Land Management, Department of Justice, Forest Service, Fish and Wildlife Service, National Park Service.

Date of Government Version: 12/31/2005	Source: U.S. Geological Survey
Date Data Arrived at EDR: 02/06/2006	Telephone: 888-275-8747
Date Made Active in Reports: 01/11/2007	Last EDR Contact: 04/14/2017
Number of Days to Update: 339	Next Scheduled EDR Contact: 07/24/2017
	Data Release Frequency: N/A

SCRD DRYCLEANERS: State Coalition for Remediation of Drycleaners Listing

The State Coalition for Remediation of Drycleaners was established in 1998, with support from the U.S. EPA Office of Superfund Remediation and Technology Innovation. It is comprised of representatives of states with established drycleaner remediation programs. Currently the member states are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 01/01/2017
Date Data Arrived at EDR: 02/03/2017
Date Made Active in Reports: 04/07/2017
Number of Days to Update: 63

Source: Environmental Protection Agency
Telephone: 615-532-8599
Last EDR Contact: 02/03/2017
Next Scheduled EDR Contact: 05/29/2017
Data Release Frequency: Varies

US FIN ASSUR: Financial Assurance Information

All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.

Date of Government Version: 10/11/2016
Date Data Arrived at EDR: 11/16/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 79

Source: Environmental Protection Agency
Telephone: 202-566-1917
Last EDR Contact: 02/15/2017
Next Scheduled EDR Contact: 05/29/2017
Data Release Frequency: Quarterly

EPA WATCH LIST: EPA WATCH LIST

EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

Date of Government Version: 08/30/2013
Date Data Arrived at EDR: 03/21/2014
Date Made Active in Reports: 06/17/2014
Number of Days to Update: 88

Source: Environmental Protection Agency
Telephone: 617-520-3000
Last EDR Contact: 02/03/2017
Next Scheduled EDR Contact: 05/22/2017
Data Release Frequency: Quarterly

2020 COR ACTION: 2020 Corrective Action Program List

The EPA has set ambitious goals for the RCRA Corrective Action program by creating the 2020 Corrective Action Universe. This RCRA cleanup baseline includes facilities expected to need corrective action. The 2020 universe contains a wide variety of sites. Some properties are heavily contaminated while others were contaminated but have since been cleaned up. Still others have not been fully investigated yet, and may require little or no remediation. Inclusion in the 2020 Universe does not necessarily imply failure on the part of a facility to meet its RCRA obligations.

Date of Government Version: 04/22/2013
Date Data Arrived at EDR: 03/03/2015
Date Made Active in Reports: 03/09/2015
Number of Days to Update: 6

Source: Environmental Protection Agency
Telephone: 703-308-4044
Last EDR Contact: 05/05/2017
Next Scheduled EDR Contact: 08/21/2017
Data Release Frequency: Varies

TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2012
Date Data Arrived at EDR: 01/15/2015
Date Made Active in Reports: 01/29/2015
Number of Days to Update: 14

Source: EPA
Telephone: 202-260-5521
Last EDR Contact: 03/24/2017
Next Scheduled EDR Contact: 07/03/2017
Data Release Frequency: Every 4 Years

TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/31/2014
Date Data Arrived at EDR: 11/24/2015
Date Made Active in Reports: 04/05/2016
Number of Days to Update: 133

Source: EPA
Telephone: 202-566-0250
Last EDR Contact: 02/24/2017
Next Scheduled EDR Contact: 06/05/2017
Data Release Frequency: Annually

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2009
Date Data Arrived at EDR: 12/10/2010
Date Made Active in Reports: 02/25/2011
Number of Days to Update: 77

Source: EPA
Telephone: 202-564-4203
Last EDR Contact: 04/26/2017
Next Scheduled EDR Contact: 08/07/2017
Data Release Frequency: Annually

ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 11/25/2013
Date Data Arrived at EDR: 12/12/2013
Date Made Active in Reports: 02/24/2014
Number of Days to Update: 74

Source: EPA
Telephone: 703-416-0223
Last EDR Contact: 03/06/2017
Next Scheduled EDR Contact: 06/19/2017
Data Release Frequency: Annually

RMP: Risk Management Plans

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g. the fire department) should an accident occur.

Date of Government Version: 02/01/2017
Date Data Arrived at EDR: 02/09/2017
Date Made Active in Reports: 04/07/2017
Number of Days to Update: 57

Source: Environmental Protection Agency
Telephone: 202-564-8600
Last EDR Contact: 04/21/2017
Next Scheduled EDR Contact: 08/07/2017
Data Release Frequency: Varies

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995
Date Data Arrived at EDR: 07/03/1995
Date Made Active in Reports: 08/07/1995
Number of Days to Update: 35

Source: EPA
Telephone: 202-564-4104
Last EDR Contact: 06/02/2008
Next Scheduled EDR Contact: 09/01/2008
Data Release Frequency: No Update Planned

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

PRP: Potentially Responsible Parties

A listing of verified Potentially Responsible Parties

Date of Government Version: 10/25/2013	Source: EPA
Date Data Arrived at EDR: 10/17/2014	Telephone: 202-564-6023
Date Made Active in Reports: 10/20/2014	Last EDR Contact: 04/25/2017
Number of Days to Update: 3	Next Scheduled EDR Contact: 05/22/2017
	Data Release Frequency: Quarterly

PADS: PCB Activity Database System

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 01/20/2016	Source: EPA
Date Data Arrived at EDR: 04/28/2016	Telephone: 202-566-0500
Date Made Active in Reports: 09/02/2016	Last EDR Contact: 04/10/2017
Number of Days to Update: 127	Next Scheduled EDR Contact: 07/24/2017
	Data Release Frequency: Annually

ICIS: Integrated Compliance Information System

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 11/18/2016	Source: Environmental Protection Agency
Date Data Arrived at EDR: 11/23/2016	Telephone: 202-564-2501
Date Made Active in Reports: 02/10/2017	Last EDR Contact: 04/10/2017
Number of Days to Update: 79	Next Scheduled EDR Contact: 07/24/2017
	Data Release Frequency: Quarterly

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/09/2009	Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Date Data Arrived at EDR: 04/16/2009	Telephone: 202-566-1667
Date Made Active in Reports: 05/11/2009	Last EDR Contact: 02/17/2017
Number of Days to Update: 25	Next Scheduled EDR Contact: 06/05/2017
	Data Release Frequency: Quarterly

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 04/09/2009	Source: EPA
Date Data Arrived at EDR: 04/16/2009	Telephone: 202-566-1667
Date Made Active in Reports: 05/11/2009	Last EDR Contact: 02/17/2017
Number of Days to Update: 25	Next Scheduled EDR Contact: 06/05/2017
	Data Release Frequency: Quarterly

MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 08/30/2016	Source: Nuclear Regulatory Commission
Date Data Arrived at EDR: 09/08/2016	Telephone: 301-415-7169
Date Made Active in Reports: 10/21/2016	Last EDR Contact: 02/03/2017
Number of Days to Update: 43	Next Scheduled EDR Contact: 05/22/2017
	Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

COAL ASH DOE: Steam-Electric Plant Operation Data

A listing of power plants that store ash in surface ponds.

Date of Government Version: 12/31/2005	Source: Department of Energy
Date Data Arrived at EDR: 08/07/2009	Telephone: 202-586-8719
Date Made Active in Reports: 10/22/2009	Last EDR Contact: 03/06/2017
Number of Days to Update: 76	Next Scheduled EDR Contact: 06/19/2017
	Data Release Frequency: Varies

COAL ASH EPA: Coal Combustion Residues Surface Impoundments List

A listing of coal combustion residues surface impoundments with high hazard potential ratings.

Date of Government Version: 07/01/2014	Source: Environmental Protection Agency
Date Data Arrived at EDR: 09/10/2014	Telephone: N/A
Date Made Active in Reports: 10/20/2014	Last EDR Contact: 03/06/2017
Number of Days to Update: 40	Next Scheduled EDR Contact: 06/19/2017
	Data Release Frequency: Varies

PCB TRANSFORMER: PCB Transformer Registration Database

The database of PCB transformer registrations that includes all PCB registration submittals.

Date of Government Version: 02/01/2011	Source: Environmental Protection Agency
Date Data Arrived at EDR: 10/19/2011	Telephone: 202-566-0517
Date Made Active in Reports: 01/10/2012	Last EDR Contact: 04/28/2017
Number of Days to Update: 83	Next Scheduled EDR Contact: 08/07/2017
	Data Release Frequency: Varies

RADINFO: Radiation Information Database

The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 01/04/2017	Source: Environmental Protection Agency
Date Data Arrived at EDR: 01/06/2017	Telephone: 202-343-9775
Date Made Active in Reports: 02/10/2017	Last EDR Contact: 04/06/2017
Number of Days to Update: 35	Next Scheduled EDR Contact: 07/17/2017
	Data Release Frequency: Quarterly

HIST FTTS: FIFRA/TSCA Tracking System Administrative Case Listing

A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006	Source: Environmental Protection Agency
Date Data Arrived at EDR: 03/01/2007	Telephone: 202-564-2501
Date Made Active in Reports: 04/10/2007	Last EDR Contact: 12/17/2007
Number of Days to Update: 40	Next Scheduled EDR Contact: 03/17/2008
	Data Release Frequency: No Update Planned

HIST FTTS INSP: FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing

A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2008
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

DOT OPS: Incident and Accident Data

Department of Transportation, Office of Pipeline Safety Incident and Accident data.

Date of Government Version: 07/31/2012
Date Data Arrived at EDR: 08/07/2012
Date Made Active in Reports: 09/18/2012
Number of Days to Update: 42

Source: Department of Transportation, Office of Pipeline Safety
Telephone: 202-366-4595
Last EDR Contact: 05/02/2017
Next Scheduled EDR Contact: 08/14/2017
Data Release Frequency: Varies

CONSENT: Superfund (CERCLA) Consent Decrees

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 09/30/2016
Date Data Arrived at EDR: 11/18/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 77

Source: Department of Justice, Consent Decree Library
Telephone: Varies
Last EDR Contact: 03/27/2017
Next Scheduled EDR Contact: 07/10/2017
Data Release Frequency: Varies

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2013
Date Data Arrived at EDR: 02/24/2015
Date Made Active in Reports: 09/30/2015
Number of Days to Update: 218

Source: EPA/NTIS
Telephone: 800-424-9346
Last EDR Contact: 02/22/2017
Next Scheduled EDR Contact: 06/05/2017
Data Release Frequency: Biennially

INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2014
Date Data Arrived at EDR: 07/14/2015
Date Made Active in Reports: 01/10/2017
Number of Days to Update: 546

Source: USGS
Telephone: 202-208-3710
Last EDR Contact: 04/14/2017
Next Scheduled EDR Contact: 07/24/2017
Data Release Frequency: Semi-Annually

FUSRAP: Formerly Utilized Sites Remedial Action Program

DOE established the Formerly Utilized Sites Remedial Action Program (FUSRAP) in 1974 to remediate sites where radioactive contamination remained from Manhattan Project and early U.S. Atomic Energy Commission (AEC) operations.

Date of Government Version: 12/23/2016
Date Data Arrived at EDR: 12/27/2016
Date Made Active in Reports: 02/17/2017
Number of Days to Update: 52

Source: Department of Energy
Telephone: 202-586-3559
Last EDR Contact: 05/05/2017
Next Scheduled EDR Contact: 08/21/2017
Data Release Frequency: Varies

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/14/2010
Date Data Arrived at EDR: 10/07/2011
Date Made Active in Reports: 03/01/2012
Number of Days to Update: 146

Source: Department of Energy
Telephone: 505-845-0011
Last EDR Contact: 02/21/2017
Next Scheduled EDR Contact: 06/05/2017
Data Release Frequency: Varies

LEAD SMELTER 1: Lead Smelter Sites

A listing of former lead smelter site locations.

Date of Government Version: 12/05/2016
Date Data Arrived at EDR: 01/05/2017
Date Made Active in Reports: 02/10/2017
Number of Days to Update: 36

Source: Environmental Protection Agency
Telephone: 703-603-8787
Last EDR Contact: 04/21/2017
Next Scheduled EDR Contact: 07/17/2017
Data Release Frequency: Varies

LEAD SMELTER 2: Lead Smelter Sites

A list of several hundred sites in the U.S. where secondary lead smelting was done from 1931 and 1964. These sites may pose a threat to public health through ingestion or inhalation of contaminated soil or dust

Date of Government Version: 04/05/2001
Date Data Arrived at EDR: 10/27/2010
Date Made Active in Reports: 12/02/2010
Number of Days to Update: 36

Source: American Journal of Public Health
Telephone: 703-305-6451
Last EDR Contact: 12/02/2009
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

US AIRS (AFS): Aerometric Information Retrieval System Facility Subsystem (AFS)

The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

Date of Government Version: 10/12/2016
Date Data Arrived at EDR: 10/26/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 100

Source: EPA
Telephone: 202-564-2496
Last EDR Contact: 03/07/2017
Next Scheduled EDR Contact: 07/10/2017
Data Release Frequency: Annually

US AIRS MINOR: Air Facility System Data

A listing of minor source facilities.

Date of Government Version: 10/12/2016
Date Data Arrived at EDR: 10/26/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 100

Source: EPA
Telephone: 202-564-2496
Last EDR Contact: 03/07/2017
Next Scheduled EDR Contact: 04/10/2017
Data Release Frequency: Annually

US MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 02/08/2017
Date Data Arrived at EDR: 02/28/2017
Date Made Active in Reports: 04/07/2017
Number of Days to Update: 38

Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959
Last EDR Contact: 02/28/2017
Next Scheduled EDR Contact: 06/12/2017
Data Release Frequency: Semi-Annually

US MINES 2: Ferrous and Nonferrous Metal Mines Database Listing

This map layer includes ferrous (ferrous metal mines are facilities that extract ferrous metals, such as iron ore or molybdenum) and nonferrous (Nonferrous metal mines are facilities that extract nonferrous metals, such as gold, silver, copper, zinc, and lead) metal mines in the United States.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/05/2005
Date Data Arrived at EDR: 02/29/2008
Date Made Active in Reports: 04/18/2008
Number of Days to Update: 49

Source: USGS
Telephone: 703-648-7709
Last EDR Contact: 03/03/2017
Next Scheduled EDR Contact: 06/12/2017
Data Release Frequency: Varies

US MINES 3: Active Mines & Mineral Plants Database Listing

Active Mines and Mineral Processing Plant operations for commodities monitored by the Minerals Information Team of the USGS.

Date of Government Version: 04/14/2011
Date Data Arrived at EDR: 06/08/2011
Date Made Active in Reports: 09/13/2011
Number of Days to Update: 97

Source: USGS
Telephone: 703-648-7709
Last EDR Contact: 03/03/2017
Next Scheduled EDR Contact: 06/12/2017
Data Release Frequency: Varies

ABANDONED MINES: Abandoned Mines

An inventory of land and water impacted by past mining (primarily coal mining) is maintained by OSMRE to provide information needed to implement the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The inventory contains information on the location, type, and extent of AML impacts, as well as, information on the cost associated with the reclamation of those problems. The inventory is based upon field surveys by State, Tribal, and OSMRE program officials. It is dynamic to the extent that it is modified as new problems are identified and existing problems are reclaimed.

Date of Government Version: 03/14/2017
Date Data Arrived at EDR: 03/17/2017
Date Made Active in Reports: 04/07/2017
Number of Days to Update: 21

Source: Department of Interior
Telephone: 202-208-2609
Last EDR Contact: 03/13/2017
Next Scheduled EDR Contact: 06/26/2017
Data Release Frequency: Quarterly

FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 07/15/2016
Date Data Arrived at EDR: 09/07/2016
Date Made Active in Reports: 11/11/2016
Number of Days to Update: 65

Source: EPA
Telephone: (404) 562-9900
Last EDR Contact: 04/07/2017
Next Scheduled EDR Contact: 06/19/2017
Data Release Frequency: Quarterly

ECHO: Enforcement & Compliance History Information

ECHO provides integrated compliance and enforcement information for about 800,000 regulated facilities nationwide.

Date of Government Version: 12/11/2016
Date Data Arrived at EDR: 12/20/2016
Date Made Active in Reports: 02/17/2017
Number of Days to Update: 59

Source: Environmental Protection Agency
Telephone: 202-564-2280
Last EDR Contact: 03/21/2017
Next Scheduled EDR Contact: 07/03/2017
Data Release Frequency: Quarterly

DOCKET HWC: Hazardous Waste Compliance Docket Listing

A complete list of the Federal Agency Hazardous Waste Compliance Docket Facilities.

Date of Government Version: 06/02/2016
Date Data Arrived at EDR: 06/03/2016
Date Made Active in Reports: 09/02/2016
Number of Days to Update: 91

Source: Environmental Protection Agency
Telephone: 202-564-0527
Last EDR Contact: 02/24/2017
Next Scheduled EDR Contact: 06/12/2017
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

UXO: Unexploded Ordnance Sites

A listing of unexploded ordnance site locations

Date of Government Version: 10/25/2015	Source: Department of Defense
Date Data Arrived at EDR: 01/29/2016	Telephone: 571-373-0407
Date Made Active in Reports: 04/05/2016	Last EDR Contact: 04/17/2017
Number of Days to Update: 67	Next Scheduled EDR Contact: 07/31/2017
	Data Release Frequency: Varies

FUELS PROGRAM: EPA Fuels Program Registered Listing

This listing includes facilities that are registered under the Part 80 (Code of Federal Regulations) EPA Fuels Programs. All companies now are required to submit new and updated registrations.

Date of Government Version: 11/21/2016	Source: EPA
Date Data Arrived at EDR: 11/22/2016	Telephone: 800-385-6164
Date Made Active in Reports: 02/03/2017	Last EDR Contact: 02/22/2017
Number of Days to Update: 73	Next Scheduled EDR Contact: 06/05/2017
	Data Release Frequency: Quarterly

COAL ASH: Coal Ash Disposal Sites

A listing of coal ash disposal site locations.

Date of Government Version: 02/02/2009	Source: Department of Environmental Management
Date Data Arrived at EDR: 06/25/2009	Telephone: 334-271-7718
Date Made Active in Reports: 07/17/2009	Last EDR Contact: 04/10/2017
Number of Days to Update: 22	Next Scheduled EDR Contact: 07/24/2017
	Data Release Frequency: Varies

DRYCLEANERS: Drycleaner Facility Listing

A listing of drycleaner sites in the voluntary DERTF.

Date of Government Version: 11/17/2016	Source: Department of Environmental Management
Date Data Arrived at EDR: 11/18/2016	Telephone: 334-271-7703
Date Made Active in Reports: 02/02/2017	Last EDR Contact: 02/13/2017
Number of Days to Update: 76	Next Scheduled EDR Contact: 05/29/2017
	Data Release Frequency: Varies

Financial Assurance: Financial Assurance Information Listing

Financial assurance information for underground storage tank facilities. Financial assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay.

Date of Government Version: 07/21/2016	Source: Department of Environmental Management
Date Data Arrived at EDR: 08/10/2016	Telephone: 334-271-7759
Date Made Active in Reports: 08/16/2016	Last EDR Contact: 03/23/2017
Number of Days to Update: 6	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Quarterly

NPDES: NPDES Permit Listing

A listing of municipal and industrial permits issued by the Department of Environmental Management.

Date of Government Version: 04/05/2012	Source: Department of Environmental Management
Date Data Arrived at EDR: 04/06/2012	Telephone: 334-271-7712
Date Made Active in Reports: 04/25/2012	Last EDR Contact: 03/24/2017
Number of Days to Update: 19	Next Scheduled EDR Contact: 07/10/2017
	Data Release Frequency: Varies

TIER 2: Tier 2 Data Listing

A listing of facilities which store or manufacture hazardous materials and submit a chemical inventory report.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/31/2013
Date Data Arrived at EDR: 06/20/2014
Date Made Active in Reports: 07/24/2014
Number of Days to Update: 34

Source: Department of Environmental Management
Telephone: 334-260-2714
Last EDR Contact: 03/09/2017
Next Scheduled EDR Contact: 06/26/2017
Data Release Frequency: Varies

UIC: UIC Listing

A listing of underground injection control wells.

Date of Government Version: 10/31/2016
Date Data Arrived at EDR: 11/08/2016
Date Made Active in Reports: 11/15/2016
Number of Days to Update: 7

Source: Geological Survey of Alabama
Telephone: 205-247-3661
Last EDR Contact: 02/07/2017
Next Scheduled EDR Contact: 05/22/2017
Data Release Frequency: Quarterly

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP: EDR Proprietary Manufactured Gas Plants

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

EDR Hist Auto: EDR Exclusive Historic Gas Stations

EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR Hist Cleaner: EDR Exclusive Historic Dry Cleaners

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA HWS: Recovered Government Archive State Hazardous Waste Facilities List

The EDR Recovered Government Archive State Hazardous Waste database provides a list of SHWS incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Environmental Management in Alabama.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 12/26/2013
Number of Days to Update: 178

Source: Department of Environmental Management
Telephone: N/A
Last EDR Contact: 06/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

RGA LUST: Recovered Government Archive Leaking Underground Storage Tank

The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from Department of Environmental Management in Alabama.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 12/26/2013
Number of Days to Update: 178

Source: Department of Environmental Management
Telephone: N/A
Last EDR Contact: 06/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

CT MANIFEST: Hazardous Waste Manifest Data

Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a tsd facility.

Date of Government Version: 07/30/2013
Date Data Arrived at EDR: 08/19/2013
Date Made Active in Reports: 10/03/2013
Number of Days to Update: 45

Source: Department of Energy & Environmental Protection
Telephone: 860-424-3375
Last EDR Contact: 11/11/2016
Next Scheduled EDR Contact: 02/27/2017
Data Release Frequency: No Update Planned

NJ MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2015
Date Data Arrived at EDR: 09/29/2016
Date Made Active in Reports: 01/03/2017
Number of Days to Update: 96

Source: Department of Environmental Protection
Telephone: N/A
Last EDR Contact: 04/11/2017
Next Scheduled EDR Contact: 07/24/2017
Data Release Frequency: Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

NY MANIFEST: Facility and Manifest Data

Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

Date of Government Version: 01/30/2017
Date Data Arrived at EDR: 02/01/2017
Date Made Active in Reports: 02/13/2017
Number of Days to Update: 12

Source: Department of Environmental Conservation
Telephone: 518-402-8651
Last EDR Contact: 05/03/2017
Next Scheduled EDR Contact: 08/14/2017
Data Release Frequency: Annually

PA MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2015
Date Data Arrived at EDR: 07/22/2016
Date Made Active in Reports: 11/22/2016
Number of Days to Update: 123

Source: Department of Environmental Protection
Telephone: 717-783-8990
Last EDR Contact: 04/18/2017
Next Scheduled EDR Contact: 07/31/2017
Data Release Frequency: Annually

RI MANIFEST: Manifest information

Hazardous waste manifest information

Date of Government Version: 12/31/2013
Date Data Arrived at EDR: 06/19/2015
Date Made Active in Reports: 07/15/2015
Number of Days to Update: 26

Source: Department of Environmental Management
Telephone: 401-222-2797
Last EDR Contact: 02/21/2017
Next Scheduled EDR Contact: 06/05/2017
Data Release Frequency: Annually

WI MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2015
Date Data Arrived at EDR: 04/14/2016
Date Made Active in Reports: 06/03/2016
Number of Days to Update: 50

Source: Department of Natural Resources
Telephone: N/A
Last EDR Contact: 03/13/2017
Next Scheduled EDR Contact: 06/26/2017
Data Release Frequency: Annually

Oil/Gas Pipelines

Source: PennWell Corporation

Petroleum Bundle (Crude Oil, Refined Products, Petrochemicals, Gas Liquids (LPG/NGL), and Specialty Gases (Miscellaneous)) N = Natural Gas Bundle (Natural Gas, Gas Liquids (LPG/NGL), and Specialty Gases (Miscellaneous)). This map includes information copyrighted by PennWell Corporation. This information is provided on a best effort basis and PennWell Corporation does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of PennWell.

Electric Power Transmission Line Data

Source: PennWell Corporation

This map includes information copyrighted by PennWell Corporation. This information is provided on a best effort basis and PennWell Corporation does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of PennWell.

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.
Telephone: 312-280-5991

The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services
Telephone: 410-786-3000

A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Nursing Homes

Source: National Institutes of Health

Telephone: 301-594-6248

Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: Licensed Centers

Source: Department of Human Resources

Telephone: 334-242-1425

Flood Zone Data: This data was obtained from the Federal Emergency Management Agency (FEMA). It depicts 100-year and 500-year flood zones as defined by FEMA. It includes the National Flood Hazard Layer (NFHL) which incorporates Flood Insurance Rate Map (FIRM) data and Q3 data from FEMA in areas not covered by NFHL.

Source: FEMA

Telephone: 877-336-2627

Date of Government Version: 2003, 2015

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetlands Data

Source: Alabama State Water Program

Telephone: 334-844-3927

Current USGS 7.5 Minute Topographic Map

Source: U.S. Geological Survey

STREET AND ADDRESS INFORMATION

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GEOCHECK® - PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

LITTLE CANOE CREEK SW PARCEL
2030 CANOE CREEK RD N
ATTALLA, AL 35954

TARGET PROPERTY COORDINATES

Latitude (North):	33.947596 - 33° 56' 51.35"
Longitude (West):	86.16139 - 86° 9' 41.00"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	577494.1
UTM Y (Meters):	3756468.0
Elevation:	554 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map:	6698290 STEELE, AL
Version Date:	2014

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principal investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

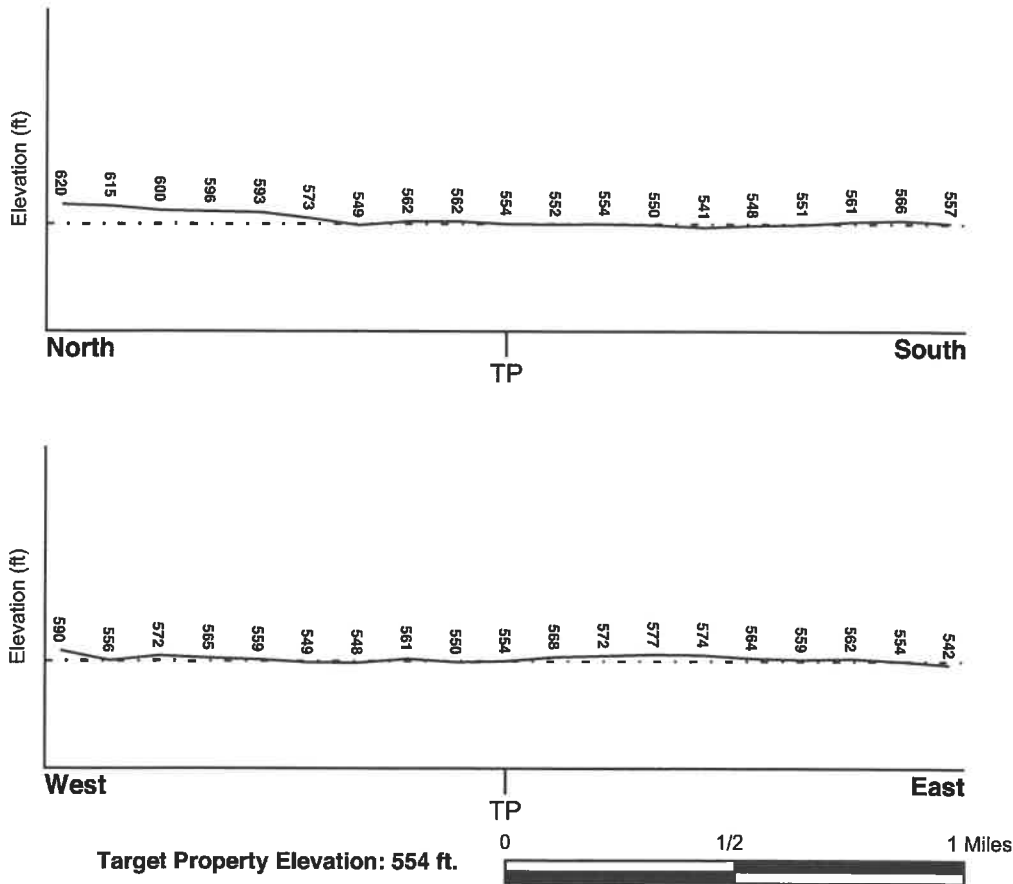
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General West

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

<u>Flood Plain Panel at Target Property</u>	<u>FEMA Source Type</u>
01115C0035F	FEMA FIRM Flood data
<u>Additional Panels in search area:</u>	<u>FEMA Source Type</u>
01115C0045F	FEMA FIRM Flood data

NATIONAL WETLAND INVENTORY

<u>NWI Quad at Target Property</u>	<u>NWI Electronic Data Coverage</u>
STEELE	YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

<u>MAP ID</u>	<u>LOCATION FROM TP</u>	<u>GENERAL DIRECTION GROUNDWATER FLOW</u>
Not Reported		

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

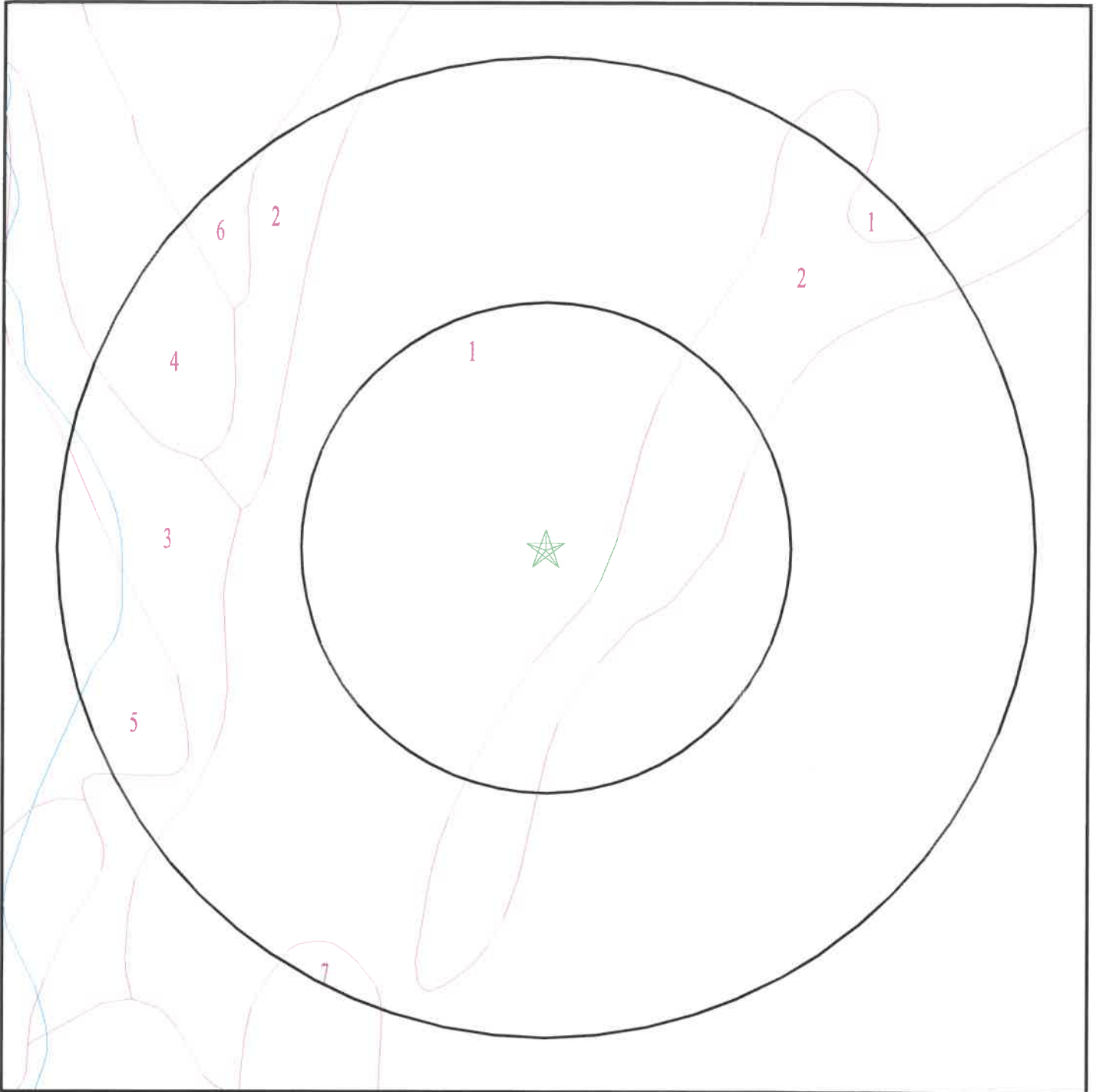
Era: Paleozoic
System: Cambrian
Series: Cambrian
Code: C *(decoded above as Era, System & Series)*

GEOLOGIC AGE IDENTIFICATION

Category: Stratified Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

SSURGO SOIL MAP - 4930947.2s



- ★ Target Property
- SSURGO Soil
- Water



SITE NAME: Little Canoe Creek SW Parcel
ADDRESS: 2030 Canoe Creek Rd N
Attalla AL 35954
LAT/LONG: 33.947596 / 86.16139

CLIENT: Goodwyn Mills & Cawood Environ.
CONTACT: Crystal Shurett
INQUIRY #: 4930947.2s
DATE: May 08, 2017 7:42 pm

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. The following information is based on Soil Conservation Service SSURGO data.

Soil Map ID: 1

Soil Component Name: Conasauga

Soil Surface Texture: loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	3 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6 Min: 3.6
2	3 inches	9 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 1.4 Min: 0.42	Max: 6 Min: 3.6
3	9 inches	38 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 6.5 Min: 3.6
4	38 inches	59 inches	weathered bedrock	Not reported	Not reported	Max: 1.4 Min: 0.42	Max: Min:

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Map ID: 2

Soil Component Name: Gaylesville
 Soil Surface Texture: silt loam
 Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.
 Soil Drainage Class: Somewhat poorly drained
 Hydric Status: Partially hydric
 Corrosion Potential - Uncoated Steel: High
 Depth to Bedrock Min: > 0 inches
 Depth to Watertable Min: > 31 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	9 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 4 Min: 0.42	Max: 6 Min: 3.6
2	9 inches	27 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 6 Min: 3.6
3	27 inches	59 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 6 Min: 3.6

Soil Map ID: 3

Soil Component Name: Chewacla
 Soil Surface Texture: silt loam
 Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.
 Soil Drainage Class: Somewhat poorly drained

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 31 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	16 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6.5 Min: 4.5
2	16 inches	22 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6.5 Min: 4.5
3	22 inches	59 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14 Min: 4	Max: 7.8 Min: 4.5
4	59 inches	63 inches	variable	Not reported	Not reported	Max: Min:	Max: Min:

Soil Map ID: 4

Soil Component Name: Wickham

Soil Surface Texture: fine sandy loam

Hydrologic Group: Class B - Moderate infiltration rates. Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.

Soil Drainage Class: Well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	fine sandy loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 42 Min: 14	Max: 6 Min: 4.5
2	7 inches	40 inches	sandy clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Clayey sand.	Max: 14 Min: 4	Max: 6 Min: 4.5
3	40 inches	59 inches	variable	Not reported	Not reported	Max: Min:	Max: Min:

Soil Map ID: 5

Soil Component Name: Tanyard

Soil Surface Texture: silt loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 61 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	5 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6 Min: 5.1

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
2	5 inches	9 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6 Min: 4.5
3	9 inches	59 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 6 Min: 4.5
4	59 inches	72 inches	sandy clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Clayey sand.	Max: 14 Min: 1.4	Max: 7.8 Min: 5.6

Soil Map ID: 6

Soil Component Name: Leadvale

Soil Surface Texture: silt loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 61 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 5.5 Min: 4.5
2	7 inches	20 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14 Min: 4	Max: 5.5 Min: 4.5
3	20 inches	59 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 4 Min: 0.42	Max: 5.5 Min: 4.5
4	59 inches	63 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 4 Min: 0.42	Max: 5.5 Min: 4.5

Soil Map ID: 7

Soil Component Name: Firestone

Soil Surface Texture: silt loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Well drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	3 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 5.5 Min: 4.5
2	3 inches	33 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.4 Min: 0.42	Max: 5.5 Min: 4.5
3	33 inches	59 inches	weathered bedrock	Not reported	Not reported	Max: 0 Min: 0	Max: Min:

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

<u>DATABASE</u>	<u>SEARCH DISTANCE (miles)</u>
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 0.001 miles
State Database	1.000

FEDERAL USGS WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No PWS System Found		

Note: PWS System location is not always the same as well location.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

STATE DATABASE WELL INFORMATION

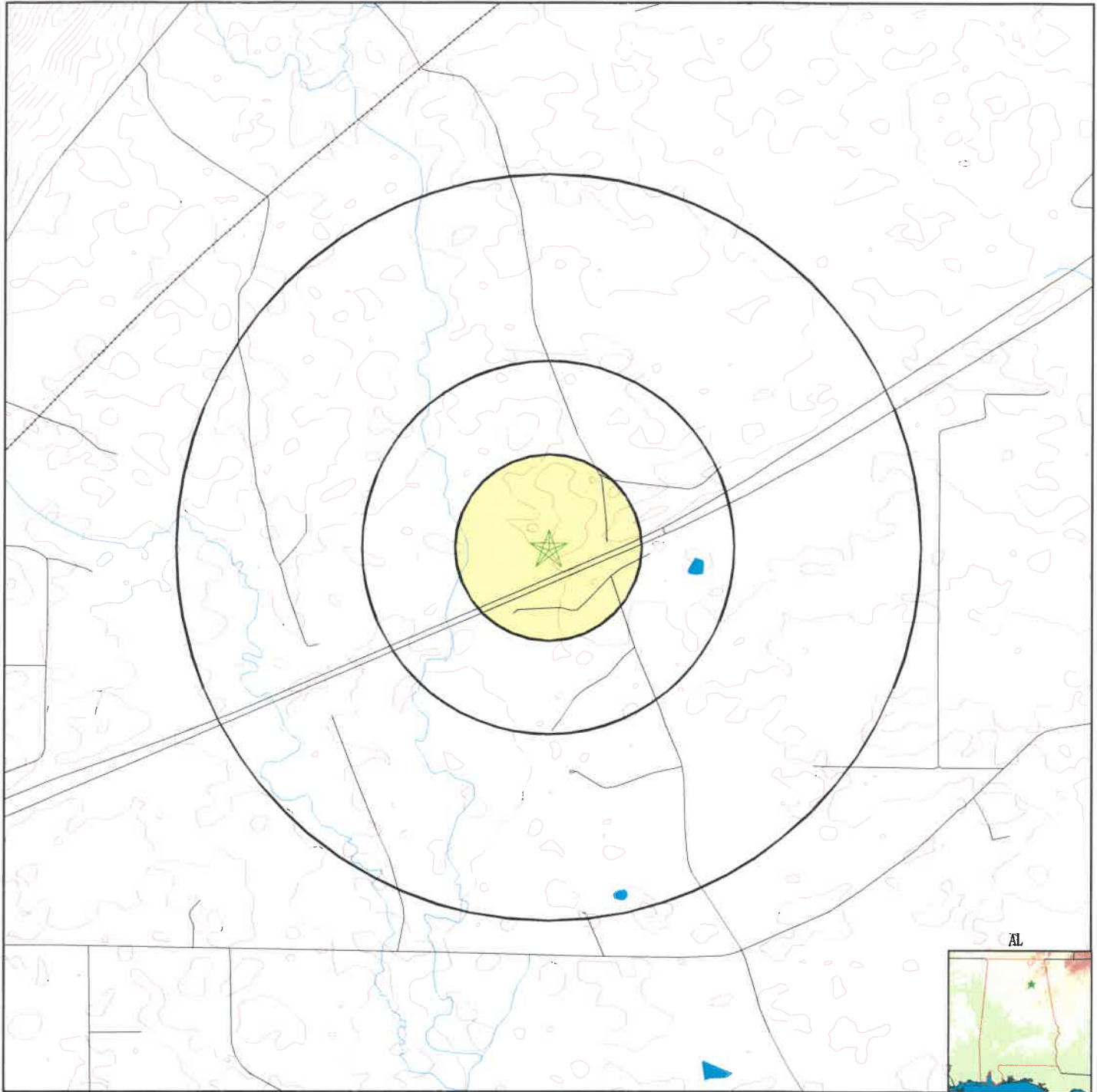
MAP ID

No Wells Found

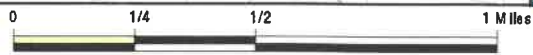
WELL ID

LOCATION
FROM TP

PHYSICAL SETTING SOURCE MAP - 4930947.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons



- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Oil, gas or related wells



<p>SITE NAME: Little Canoe Creek SW Parcel ADDRESS: 2030 Canoe Creek Rd N Attalla AL 35954 LAT/LONG: 33.947596 / 86.16139</p>	<p>CLIENT: Goodwyn Mills & Cawood Environ. CONTACT: Crystal Shurett INQUIRY #: 4930947.2s DATE: May 08, 2017 7:42 pm</p>
---	---

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

State Database: AL Radon

Radon Test Results

Num Tested	< 4 pCi/L	> 4 pCi/L	% > 4 pCi/L	Avg Level	Highest
25	24	1	4	2.19	11.7

Federal EPA Radon Zone for ETOWAH County: 2

Note: Zone 1 indoor average level > 4 pCi/L.
 : Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
 : Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for Zip Code: 35954

Number of sites tested: 1

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	Not Reported	Not Reported	Not Reported	Not Reported
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	3.100 pCi/L	100%	0%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)

Source: United States Geologic Survey

EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Current USGS 7.5 Minute Topographic Map

Source: U.S. Geological Survey

HYDROLOGIC INFORMATION

Flood Zone Data: This data was obtained from the Federal Emergency Management Agency (FEMA). It depicts 100-year and 500-year flood zones as defined by FEMA. It includes the National Flood Hazard Layer (NFHL) which incorporates Flood Insurance Rate Map (FIRM) data and Q3 data from FEMA in areas not covered by NFHL.

Source: FEMA

Telephone: 877-336-2627

Date of Government Version: 2003, 2015

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetlands Data

Source: Alabama State Water Program

Telephone: 334-844-3927

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System

Source: EDR proprietary database of groundwater flow information

EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit

Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)

Telephone: 800-672-5559

SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Service, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)

This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

STATE RECORDS

Alabama Wells Data

Source: Department of Environmental Management

Telephone: 334-271-7985

OTHER STATE DATABASE INFORMATION

Well Surface Locations

Source: Geological Survey of Alabama, State Oil and Gas Board

Telephone: 205-247-3661

A listing of oil and gas well locations in the state

RADON

State Database: AL Radon

Source: Department of Public Health

Telephone: 334-206-5391

Short-Term Test Results for Alabama Counties

Area Radon Information

Source: USGS

Telephone: 703-356-4020

The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones

Source: EPA

Telephone: 703-356-4020

Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities

Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration

Earthquake Fault Lines: The fault lines displayed on EDR's Topographic map are digitized quaternary faultlines, prepared in 1975 by the United State Geological Survey

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STREET AND ADDRESS INFORMATION

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**APPENDIX IV
ASTM E 1527-13 USER QUESTIONNAIRE**

ASTM E 1527-05 User Questionnaire

In order to qualify for the protection offered under the EPA All Appropriate Inquiry (AAI) Standard, the User (entities seeking to use the ASTM E1527-05 Practice to complete an environmental site assessment of the property; i.e. Lenders and/or Borrowers) must provide the following information (if available) to the environmental professional. Failure to provide this information could result in a determination that AAI is not complete. This information should be the collective knowledge of the entities relying on the Phase I. **Please note that you are not being asked to evaluate the property, but rather to provide your knowledge of information on the property.**

Site Name/Address: Little Canoe Creek Megasite, Attalla, AL 35954

Person Interviewed/Title: Sherrie Y. Kelley C.A.D. Date: May 18, 2017

If known, when was the property initially developed? Not developed, timberland & pasture

If different, when were the current building(s) on the property constructed? Vacant land

1. Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25).

Are you aware of any environmental cleanup liens against the *property* that are filed or recorded under federal, tribal, state or local law? (Note: If unknown, a review of title records or an environmental lien search is recommended)

Yes No If you answer yes, please include an explanation in the space provided below:

2. Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry (40 CFR 312.26).

Are you aware of any AULs, such as *engineering controls*, land use restrictions or *institutional controls* that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law?

Engineering Controls are defined as physical modifications to a site or facility to reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or ground water on the property). *Institutional Controls* are defined as a legal or administrative restriction on the use of, or access to, a site or facility to 1) reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or ground water on the property, or 2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment.

Yes No If you answer yes, please include an explanation in the space provided below:

3. Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).

As the *User* of this *ESA* do you have any specialized knowledge or experience related to the *property* or nearby properties? For example, are you involved in the same line of business as the current or former *occupants* of the *property* or an adjoining *property* so that you would have specialized knowledge of the chemicals and processes used by this type of business?

Yes No If you answer yes, please include an explanation in the space provided below:

4. Relationship of the purchase price to the fair market value of the *property* if it were not contaminated (40 CFR 312.29).

a) Does the purchase price being paid for this *property* reasonably reflect the fair market value of the *property*?

Yes No If you answer no, please include an explanation in the space provided below, including whether the lower purchase price is because contamination is known or believed to be present at the *property*?

5. Commonly known or *reasonably ascertainable* information about the *property* (40 CFR 312.30).

Are you aware of commonly known or *reasonably ascertainable* information about the *property* that would help the *environmental professional* to identify conditions indicative of releases or threatened releases? For example, as *User*:

a. Do you know the past uses of the *property*?

Yes No

b. Do you know of specific chemicals that are present or once were present at the *property*?

Yes No

c. Do you know of spills or other chemical releases that have taken place at the *property*?

Yes No

d. Do you know of any environmental cleanups that have taken place at the *property*?

Yes No

If you answered yes to any of the questions above, please include an explanation in the space provided below:

6. The degree of obviousness of the presence of likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).

As the *User* of this *ESA*, based on your knowledge and experience related to the *property*, are there any *obvious* indicators that point to the presence or likely presence of contamination at the *property*?

Yes No If you answer yes, please include an explanation in the space provided below:

Please provide the following property contact information:

Property Owner: Etowah County Comm. Phone Number: 256-549-5300
Key Site Personnel: Sherrie Y. Kelley CAO Phone Number: 256-549-5495
Past Owner: Several Phone Number: N/A

**APPENDIX V
EDR AERIAL PHOTO DECADE PACKAGE &
CERTIFIED
SANBORN MAP REPORT**

Little Canoe Creek
100 Canoe Creek Rd N
ATTALLA, AL 35954

Inquiry Number: 4930912.5
May 09, 2017

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

05/09/17

Site Name:

Little Canoe Creek
100 Canoe Creek Rd N
ATTALLA, AL 35954
EDR Inquiry # 4930912.5

Client Name:

Goodwyn Mills & Cawood Environ.
2660 East Chase Lane
Montgomery, AL 36117
Contact: Crystal Shurett



Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

Search Results:

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
2011	1"=500'	Flight Year: 2011	USDA/NAIP
2009	1"=500'	Flight Year: 2009	USDA/NAIP
2006	1"=500'	Flight Year: 2006	USDA/NAIP
2005	1"=500'	Flight Year: 2005	USDA/NAIP
1997	1"=500'	Acquisition Date: March 07, 1997	USGS/DOQQ
1992	1"=750'	Flight Date: January 11, 1992	USGS
1975	1"=1000'	Flight Date: December 02, 1975	USGS
1972	1"=500'	Flight Date: January 08, 1972	USGS
1952	1"=1000'	Flight Date: February 21, 1952	USGS

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INQUIRY #: 4930912.5

YEAR: 2011

— = 500'





INQUIRY #: 4930912.5

YEAR: 2011

— = 500'





INQUIRY #: 4930912.5

YEAR: 2009

— = 500'





INQUIRY #: 4930912.5

YEAR: 2009

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 2006

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 2006

_____ = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 2005

— = 500'





INQUIRY #: 4930912.5

YEAR: 2005

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 1997

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 1997

— = 500'





INQUIRY #: 4930912.5

YEAR: 1992

— = 750'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 1975

— = 1000'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 1972

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 1972

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930912.5

YEAR: 1952

— = 1000'



Little Canoe Creek SW Parcel
2030 Canoe Creek Rd N
Attalla, AL 35954

Inquiry Number: 4930947.5
May 09, 2017

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

05/09/17

Site Name:

Little Canoe Creek SW Parcel
2030 Canoe Creek Rd N
Attalla, AL 35954
EDR Inquiry # 4930947.5

Client Name:

Goodwyn Mills & Cawood Environ.
2660 East Chase Lane
Montgomery, AL 36117
Contact: Crystal Shurett



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Search Results:

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
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2006	1"=500'	Flight Year: 2006	USDA/NAIP
2005	1"=500'	Flight Year: 2005	USDA/NAIP
1997	1"=500'	Acquisition Date: March 07, 1997	USGS/DOQQ
1987	1"=1000'	Flight Date: April 29, 1987	USGS
1982	1"=1000'	Flight Date: February 21, 1982	USGS
1975	1"=1000'	Flight Date: December 02, 1975	USGS
1972	1"=500'	Flight Date: January 08, 1972	USGS

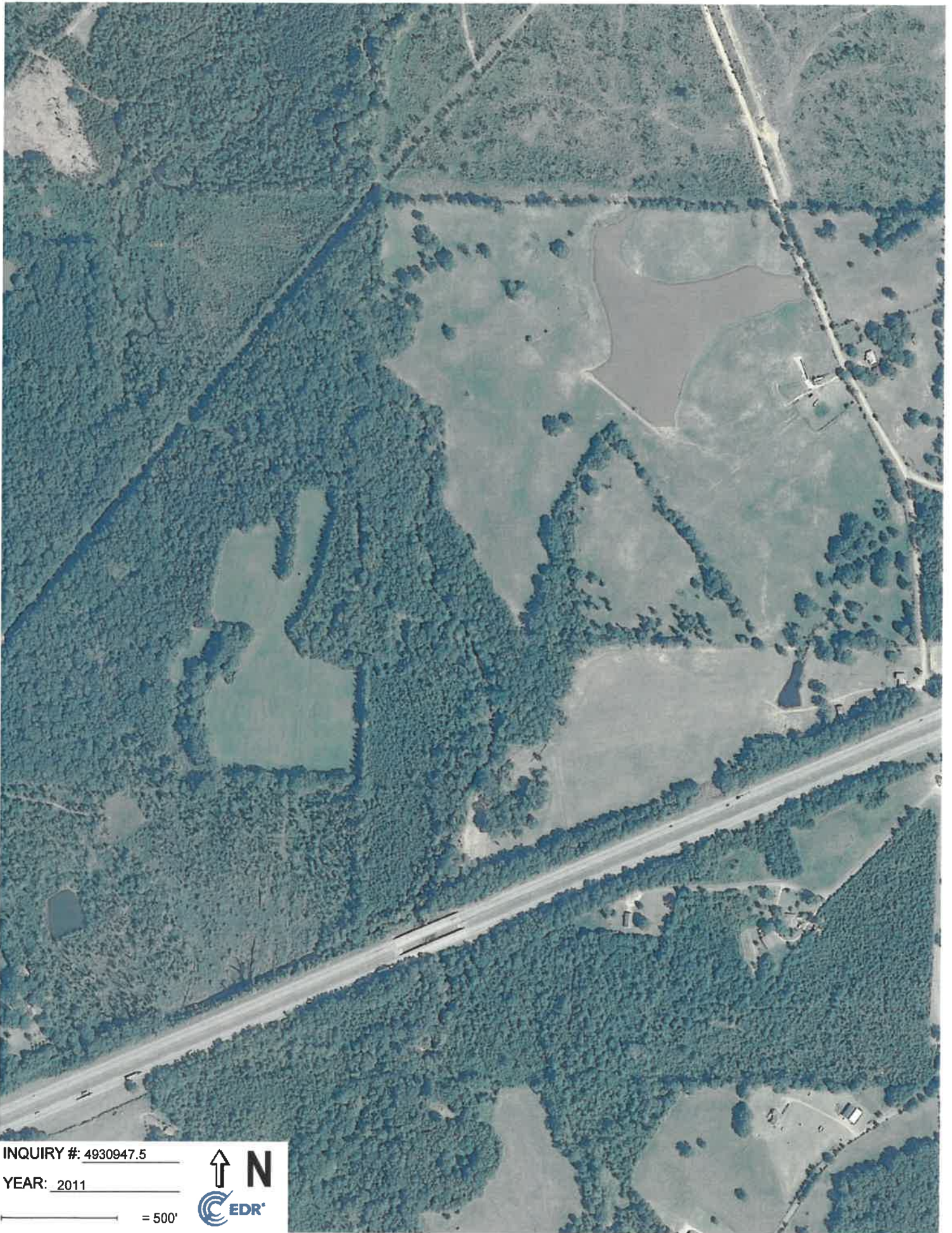
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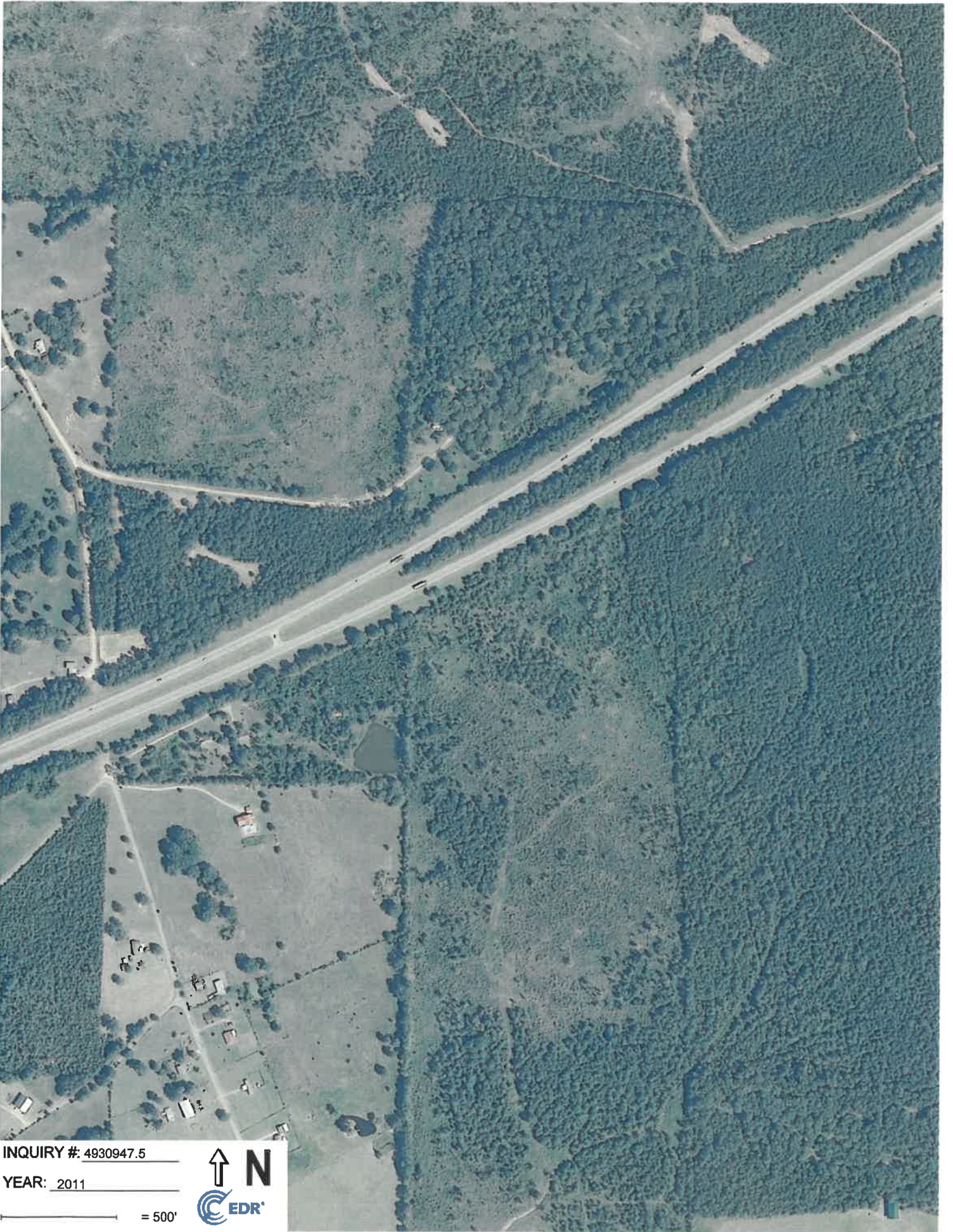
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YEAR: 2011

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 2011

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 2011

— = 500'



AS198 Phase I Environmental Study 2008-05-14



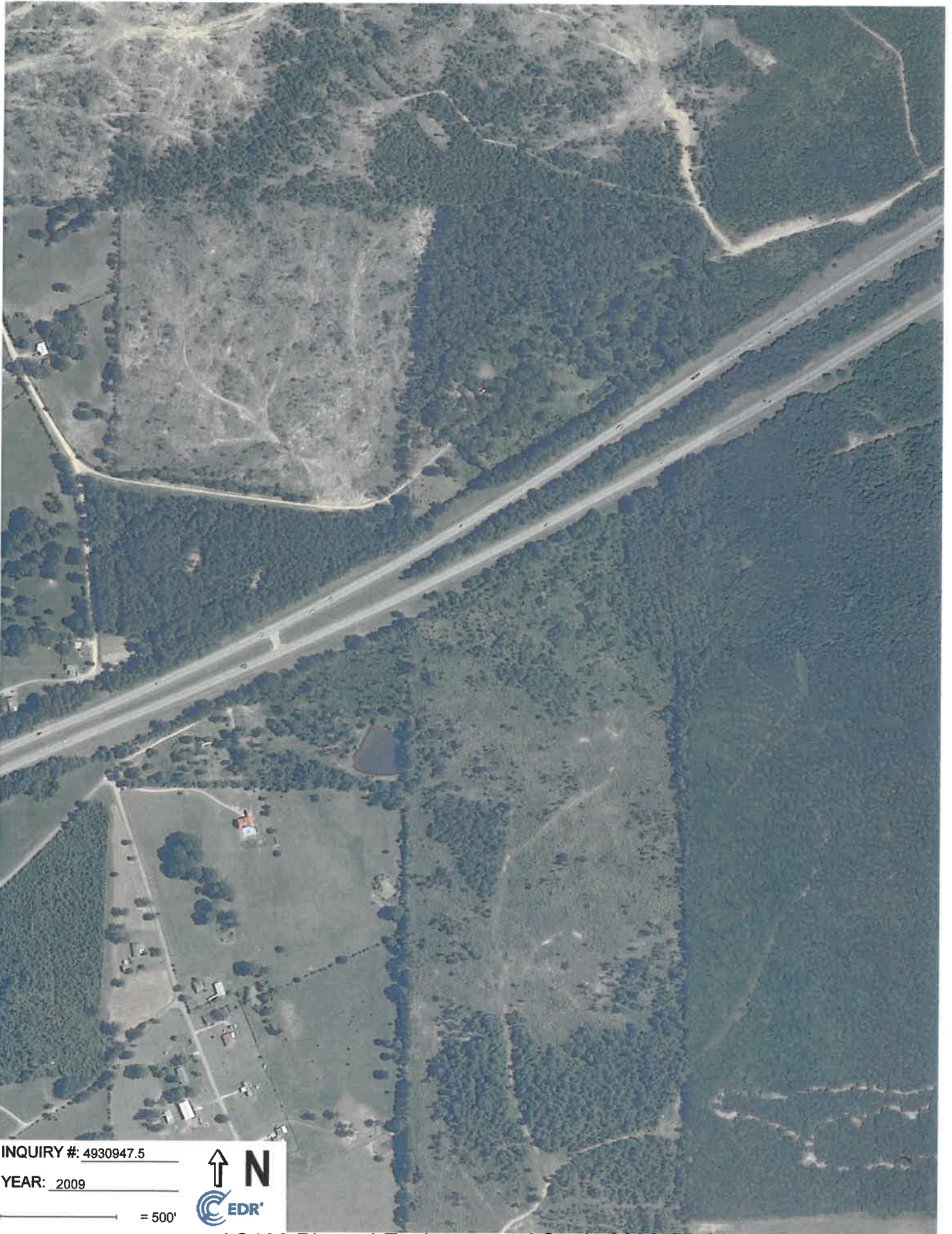
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YEAR: 2009

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AS198 Phase I Environmental Study 2008-05-14



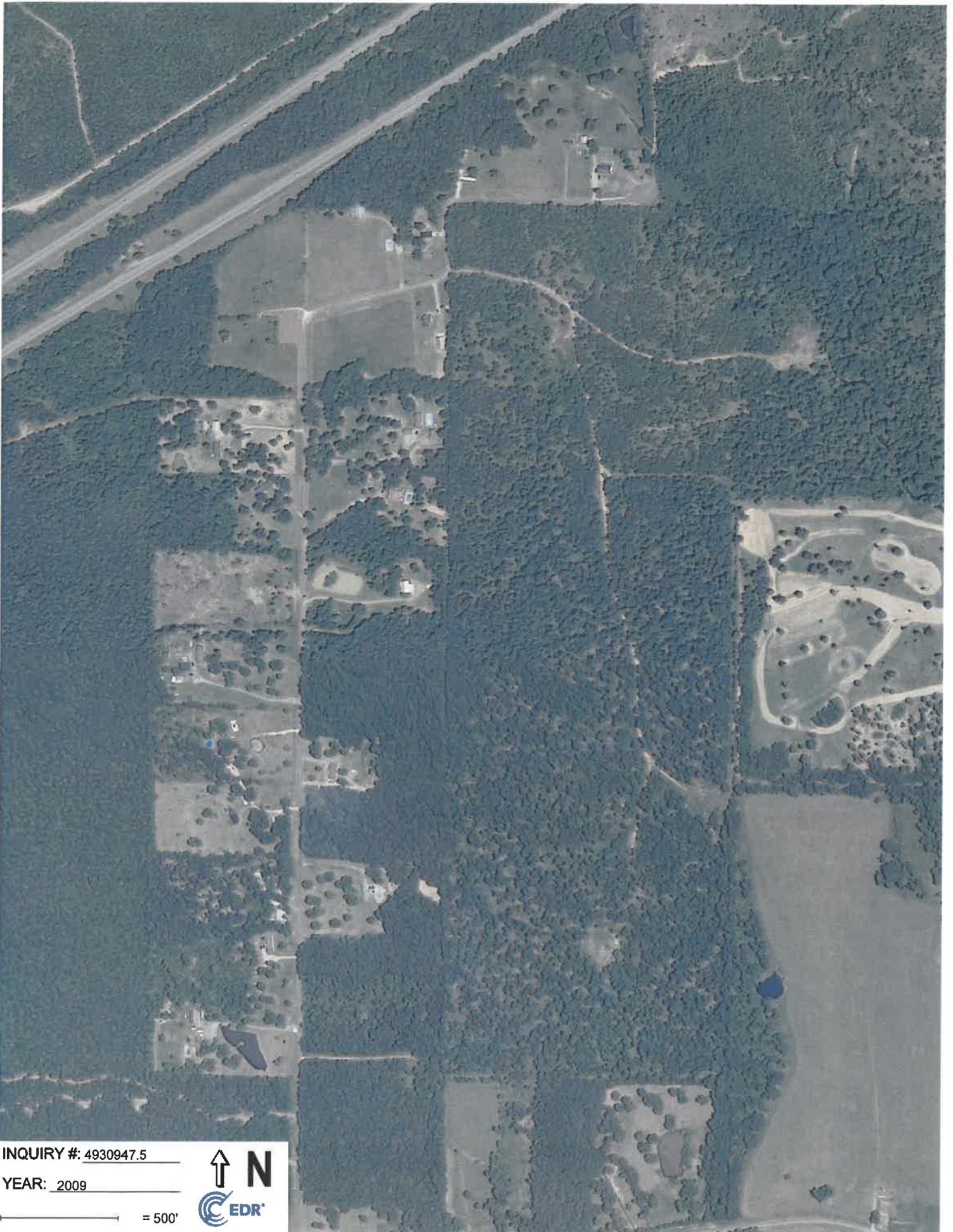
INQUIRY #: 4930947.5

YEAR: 2009

— = 500'



AS198 Phase I Environmental Study 2008-05-14

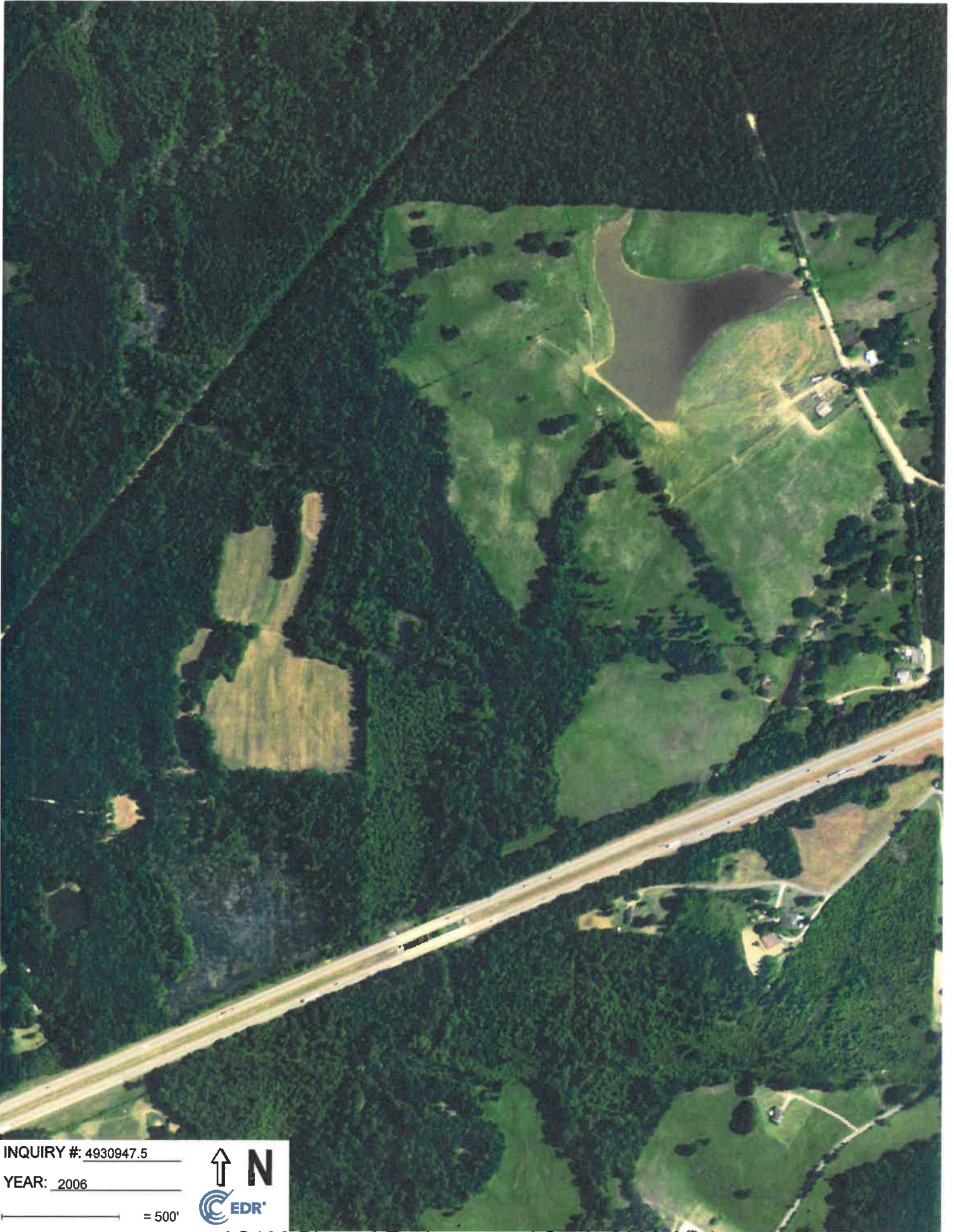


INQUIRY #: 4930947.5

YEAR: 2009

— = 500'





INQUIRY #: 4930947.5

YEAR: 2006

— = 500'





INQUIRY #: 4930947.5

YEAR: 2006

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 2006

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 2005

— = 500'





INQUIRY #: 4930947.5

YEAR: 2005

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 2005

— = 500'





INQUIRY #: 4930947.5

YEAR: 1997

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 1997

— = 500'





INQUIRY #: 4930947.5

YEAR: 1997

— = 500'





INQUIRY #: 4930947.5

YEAR: 1987

— = 1000'





INQUIRY #: 4930947.5

YEAR: 1987

— = 1000'





INQUIRY #: 4930947.5

YEAR: 1982

— = 1000'





INQUIRY #: 4930947.5

YEAR: 1982

— = 1000'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 1975

— = 1000'





INQUIRY #: 4930947.5

YEAR: 1975

— = 1000'



AS198 Phase 1 Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 1972

— = 500'





INQUIRY #: 4930947.5

YEAR: 1972

— = 500'





INQUIRY #: 4930947.5

YEAR: 1972

— = 500'



AS198 Phase I Environmental Study 2008-05-14



INQUIRY #: 4930947.5

YEAR: 1972

— = 500'



AS198 Phase I Environmental Study 2008-05-14

Little Canoe Creek
100 Canoe Creek Rd N
ATTALLA, AL 35954

Inquiry Number: 4930912.3
May 08, 2017

Certified Sanborn® Map Report



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

05/08/17

Site Name:

Little Canoe Creek
100 Canoe Creek Rd N
ATTALLA, AL 35954
EDR Inquiry # 4930912.3

Client Name:

Goodwyn Mills & Cawood Environ.
2660 East Chase Lane
Montgomery, AL 36117
Contact: Crystal Shurett



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Certified Sanborn Results:

Certification # 6AB4-4D8F-AFCF
PO # EBHM170011
Project Little Canoe Creek NW Parcel



Sanborn® Library search results

Certification #: 6AB4-4D8F-AFCF

UNMAPPED PROPERTY

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- Library of Congress
- University Publications of America
- EDR Private Collection

The Sanborn Library LLC Since 1866™

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Little Canoe Creek SW Parcel
2030 Canoe Creek Rd N
Attalla, AL 35954

Inquiry Number: 4930947.3
May 08, 2017

Certified Sanborn® Map Report



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

05/08/17

Site Name:

Little Canoe Creek SW Parcel
2030 Canoe Creek Rd N
Attalla, AL 35954
EDR Inquiry # 4930947.3

Client Name:

Goodwyn Mills & Cawood Envirn.
2660 East Chase Lane
Montgomery, AL 36117
Contact: Crystal Shurett



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PO # EBHM170011
Project Little Canoe Creek SW Parcel



Sanborn® Library search results

Certification #: 455F-47E3-8F38

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- Library of Congress
- University Publications of America
- EDR Private Collection

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**APPENDIX VI
ENVIRONMENTAL PROFESSIONAL
QUALIFICATIONS**

RESUMES



Stuart Blackwell, PWS Biologist

CAREER SUMMARY

Stuart is a Biologist who has 12 years of experience in conducting Phase I and Phase II Environmental Site Assessments, Environmental Assessments, Wetland Compliance, and Threatened/Endangered Species surveys. Stuart is proficient in performing legal research, on-site investigations, historical review, interviews, and preparation of written reports. He also has experience in ground water monitoring, soil sampling, asbestos surveys, and lead paint surveys.

EDUCATION

- o B.S. Wildlife Biology, Auburn University, 2000

CERTIFICATION & TRAINING

- o Erosion and Sediment Control & Stormwater Management, 2003
- o Phase I Environmental Site Assessment Training, 2006
- o Qualified Credentialed Inspector #46475 (QCI), 2006
- o Project Management Bootcamp, 2007
- o Stream Restoration Using Natural Channel Design, 2007
- o Wetland Delineation Training, 2009
- o Stream Identification Training, 2010
- o Professional Wetland Scientist #2002, 2010

PHASE I ENVIRONMENTAL SITE ASSESSMENTS

- o American Village - Montevallo, AL
- o Villas at Moore Farm - Huntsville, AL
- o Prince Property - Jackson County, AL
- o Bass Pro Shops - Leeds, AL
- o Birmingham Wholesale Furniture - Birmingham, AL
- o Little Canoe Creek Industrial Park - Etowah County, AL
- o Indian Head Cotton Mill - Cordova, AL
- o Clay County Airport - Clay County, AL
- o Ooltewah Urgent Care Center - Ooltewah, TN
- o Russell Properties - Alexander City, AL
- o Dollar General Distribution Center - Birmingham, AL
- o Hibbett Sporting Goods Distribution Center - Shelby County, AL
- o Hyundai Manufacturing Facility - Montgomery, AL
- o Meridianville Urgent Care Center - Meridianville, AL

PHASE II ENVIRONMENTAL SITE ASSESSMENTS

- o Mountain Brook Village - Birmingham, AL
- o Grief Brothers Property - Cullman, AL
- o 1st Avenue CSX Property - Montgomery, AL



Crystal Shurett

Goodwyn, Mills and Cawood, Inc.
Environmental Scientist

CAREER SUMMARY

Crystal is an Environmental Scientist in GMC's Birmingham office. Her background includes experience in site investigations, historical reviews, preparations of written reports, stormwater permits, construction best management plans, and management of an EPA brownfield grant and cleanup. Before joining GMC, Crystal worked for the US Green Building Council of Alabama where she was part of the committee to establish and describe Alabama's Regional Priority Zones for LEED Regional Credits, created GIS layers for Regional Priority Zones, and developed study guide and conducted study sessions for the LEED Green Advantage Exam.

EDUCATION

Masters of Science in Civil and Environmental Engineering,
University of Alabama at Birmingham | 2016

Bachelor of Arts in Urban Environmental Studies,
Birmingham-Southern College | 2012

PROFESSIONAL CERTIFICATIONS

40 Hour OSHA HAZWOPER

LEED Green Associate
Accredited

TRAININGS

ITRC Petroleum Vapor Intrusion: Fundamentals of Screening, Investigation, and Management, 2016

ASTM Phase I/II Environmental Site Assessment Processes, 2017

Leveraging Resources for Brownfields Revitalization, 2017

SAMPLING/MONITORING PROJECTS

- o Lane Park - Mountain Brook, Alabama (well monitoring)
- o Lighthouse Mini Warehouse - Gautier, MS (soil/groundwater sampling)
- o Jerry Lee Fuel - Gautier, MS (tank pull and soil sampling)

WETLAND DELINEATION PROJECTS

- o Arab High School - Arab, AL

PHASE I/II ENVIRONMENTAL SITE ASSESSMENTS

- o Premier Kings Collinsville Site - Collinsville, AL
- o Lighthouse Mini Warehouse - Gautier, MS
- o Cullman Shop - Cullman, AL
- o Docks Warehouse - Birmingham, AL
- o East Lake Blvd - Birmingham, AL
- o Denton Road - Tuscumbia, AL
- o Odenville Parcel - Odenville, AL
- o Clay County Airport - Ashland/Lineville, AL
- o TNC Jernigan Tract - Cedar Bluff, AL
- o Martin Bluff - Gautier, MS
- o Smith Boat Launch - Gautier, MS
- o Shepard State Park - Gautier, MS

NEPA/ENVIRONMENTAL ASSESSMENTS AND CATEGORICAL EXCLUSIONS

- o Intersection Improvements to AL-25 at 10th Street (FHWA/ALDOT)
- o Improvements from SR-77 to US Hwy 78 (FHWA/ALDOT)
- o Reconfiguration on US-78 at Barry Street (FHWA/ALDOT)
- o Resurface Stadium Trace and Brocks Gap Parkway (FHWA/ALDOT)
- o Cullman Water Treatment Plant (EPA)

GRANTS

- o EPA Brownfields Cleanup Grant 2016, Bethel Avenue Parcel, Tarrant, AL
- o EPA Brownfields Cleanup Grant 2016, Georgia Street Parcel, Tarrant, AL