

**APPENDIX H**

**RESULTS OF ASBESTOS AND LEAD TESTING**



**Advanced Environmental Consulting, Inc.**

P. O. Box 82905

Baton Rouge, LA 70884

225-753-4031 Fax 225-753-4033

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February 18, 2009

Ms. Cheryl Wells  
Quaternary Resource Investigations, LLC  
13588 Florida Blvd.  
Baton Rouge, LA 70819

RE: Asbestos Building Inspection – Old Lincoln Theatre, Baton Rouge, LA  
AEC File No.: 09-041

Ms. Wells:

At your request, Advanced Environmental Consulting, Inc. (AEC) mobilized a team of professional staff members to conduct an asbestos, lead-based paint and lead in drinking water inspection at the referenced building. The inspection was conducted in accordance with applicable regulations and industry accepted practices on February 10, 2009 by Glenn Johnson, Louisiana Department of Environmental Quality (LDEQ) inspector number 9I00130 and Mr. Lanny Herring, LDEQ Lead-based paint Risk Assessor number Pb09RA00088.

The site was a theatre with a portion of the ground floor set aside as a barber shop. The ground floor had a snack bar area and an office. The second floor was the site of multiple offices. The main building was of cinderblock and brick construction with terrazzo flooring, resilient floor tile, carpet and concrete. The theatre portion had an acoustical treatment on the walls and ceiling. There were no boiler rooms located during the inspection process.

***ASBESTOS***

Suspect asbestos-containing materials were sampled in accordance with applicable regulations and industry accepted practices and forwarded to a third party laboratory. Four suspect asbestos-containing materials were identified in structure at the time of the inspection. Samples were forwarded to Crisp Analytical Laboratories under chain-of-custody procedures for analysis by polarized light microscopy.

The materials that tested positive for asbestos content of greater than one percent was limited to the 9 inch floor tile and mastic that is located on the second floor office spaces.

***LEAD-BASED PAINT***

Attached is a separate report that included readings from a Radiation Monitoring Device (RMD) x-ray fluorescence analyzer. The direct reading instrument was calibrated in accordance with instructions from the manufacturer against a standard. Once calibrated,

Advanced Environmental Consulting, Inc.

Ms. Cheryl Wells  
February 18, 2009  
AEC File No.: 09-041  
Page 2

readings were taken of both interior and exterior painted building components for determination of lead content.

The exterior coatings on the exterior doors and door frames tested positive for lead above the regulatory limit of 1.0 milligrams per cubic centimeter of surface area.

### ***LEAD IN DRINKING WATER***

Samples of potable water were obtained from two locations in the building. 1) Drinking water fountain in the barber shop area. 2) Sink in the snack bar area. Samples were collected in containers provided by a third party laboratory in the following manner:

- Cut 1 – Initial cut of water (quart) designed to represent water that has been in contact with the fixtures at the sample location.
- Cut 2 – Water (quart) taken immediately following the initial cut – designed to represent water in the lines under the sink and in the walls.
- Cut 3 – With the water flowing after Cut 2 and the water turns cold. Collect (quart) of water designed to represent water in the line between the building and the water main.
- Cut 4 – Water allowed to flow approximately one minute longer after Cut 3 designed to represent water in the water main.

Results, attached, reflect lead in water above the regulatory limit of 15 parts per billion.

Lead in Drinking Water – the Owner should consider replacing fixtures in the structure to newer – no lead – fixtures. As a precaution, in those sinks utilized for potable purposes the water should be allowed to run freely for three to four minutes each morning in order to flush the system.

Thank you for allowing AEC the opportunity to be of service. We appreciate your business. If you have any questions concerning this correspondence, please do not hesitate to contact the undersigned.

Yours truly,  
Advanced Environmental Consulting, Inc.



Glenn L. Johnson  
President

Attachments

Advanced Environmental Consulting, L. L. C.

P. O. Box 82905  
Baton Rouge, LA 70884  
225-753-4031 Fax 225-753-4033  
advenvironmental@bellsouth.net

Building Construction Sheet

Building Name: LINCOLN TOWER

Date: 2/9/09

Project No: 09-041

Ceiling: Suspended  Gypsum Wood Metal Other \_\_\_\_\_

Deck:  Wood Metal Transite Concrete Other \_\_\_\_\_

Insulation:  Fiber Glass Spray Fire Proof None Other \_\_\_\_\_

Flooring:  Tile Sheet Vinyl Carpet  Terrazzo  Concrete Ceramic Wood  
Other \_\_\_\_\_

HVAC: Cooling Tower  Central Air Boiler Other WINDOW UNITS

Walls:  Gypsum Brick/block  Paneling  Plaster Other \_\_\_\_\_

Pipe Insul.  Rubber Fiberglass Foam Glass Styrofoam Other \_\_\_\_\_

Boiler: Identify Insulation and Describe: None

Walkway: Wood  Metal Concrete None Other: \_\_\_\_\_

Other information: \_\_\_\_\_

Circle appropriate response provide information on "other"

SURVEY DATA SHEET

**ADVANCED ENVIRONMENTAL CONSULTING**

P. O. BOX 82905  
 Baton Rouge, LA 70884  
 225-753-4031 Fax 225-753-4033  
 gjohnson@advenvir.com  
 www.advenvir.com

Date: 2/9/09

Page: 1 of 1

Job #: 09-041

Technician: SLJ

Client: Quantilana  
 Building/Area: Kingswood Theater

Type of Survey: Asst/Asst  
 Project Location: \_\_\_\_\_

Sample	Description	Location	Quantity
1	12" FT	STAGE	30 x 18
2	FT ON STAGE UNDER #1	STAGE	
3	Acoustical texture on wall	COILING Auditorium	
4	9" FT TILES	2 <sup>nd</sup> Floor Offices	4572222

FT - floor tile CT - ceiling tile PI - pipe insulation SA - spray applied M - mastic GYP - gypsum T - transit R - roofing SF - square feet LF - linear feet



**Crisp Analytical Laboratories, L.L.C.**

2081 Hutton Dr., Suite 301  
 Carrollton, TX 75006  
 PH: (972) 488-1414  
 Fax: (972) 488-8006

**CA Labs, L.L.C.**

12232 Industriplex, Suite 32  
 Baton Rouge, LA 70809  
 PH: (225) 751-5632  
 Fax: (225) 751-5634

**Polarized Light Asbestorm Materials Characterization**

**Customer Info:** Attn: Glen Johnson  
**Advanced Environmental Consulting, LLC**  
 P.O. Box 82805  
 Baton Rouge, LA 70884

**Customer Project:**  
 Lincoln Theater  
 09-041

**CA Labs Project #:**  
 CBR0902265

**Turnaround Time:** 3 day

**Date:** 2/16/2009  
**Samples Received:** 02/10/09

**Phone #** 225-753-4031  
**Fax #** 225-763-4033

**Purchase Order #:**

Sample #	Com ment	Layer #	Analysts Physical Description of Subsample	Homog-eneo us (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
1		1	black floor tile	Y	None Detected		100% bi,qu,ca
1		2	tan mastic	Y	None Detected	10% ca	90% qu,bi
2		1	gray/black tile material	N	None Detected		100% qu,bi,ca
3		1	gray fire proofing	Y	None Detected	30% ce 10% sy	60% bi
4		1	tan floor tile	Y	3% Chrysotile		97% wc,ca
4		2	black mastic	Y	4% Chrysotile		96% ma

**Analysis Method:** Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-800 / R-63/118)  
**Preparation Method:** HCL acid washing for asbestos based samples, chemical reduction for organically bound components, all immersion for identification of asbestos types by dispersion staining / backscat method.

ca - carbonate	mi - mica	lg - fibrous	tr - trvoite
gyssach - gypsum	ve - vermiculite	ms - mineral wool	ka - Kaolin (clay)
bi - binder	ot - other	wo - wollastinite	ps - polyethylene (stap)
or - organic	pe - perlite	ts - talc	
ma - matrix	qu - quartz	sy - synthetic	
		ce - cellulose	

Approved Signatories:

Andrew Linton  
 Analyst

Laboratory Director  
 Cody Newton

Senior Analyst  
 Andrew Linton

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damage affecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected

5. Not enough sample to analyze
6. Anthophyllite in association with Fibrous Test
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method



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 PH: (225) 751-5632  
 Fax: (225) 751-5634

Summary of Project Sample Material Containing Asbestos

CA Labs Project #: CBR0902265

Sample #	Layer #	Analysis Subsample	Physical Description of	Asbestos type / calibrated visual estimate percent
4	1		tan floor tile	3% Chrysotile
4	2		black mastic	4% Chrysotile

Baton Rouge NYLAP Lab Code 200772-0 TEMPLUM  
 LDEQ

TDH 30-0370

*Classify of abbreviations (non-asbestos fibers and non-fibrous minerals):*

- |                  |              |                    |                       |
|------------------|--------------|--------------------|-----------------------|
| ca - carbonite   | pa - perlite | fg - fiberglass    | ps - pyrogenic (clay) |
| gy - gypsum      | qu - quartz  | me - mineral wool  |                       |
| bl - binder      |              | wo - wollastonite  |                       |
| or - organic     |              | ts - talc          |                       |
| ms - mastic      |              | sy - sylvite       |                       |
| ms - mica        |              | ca - calcite       |                       |
| ve - vermiculite |              | br - brucite       |                       |
| ot - other       |              | ka - kaolin (clay) |                       |

This report relates to the items tested. This report is not to be used by the customer to claim product certification, approval or endorsement by NYLAP, NIST or any other agency of the federal government. This report may not be reproduced except in full without written permission from CA Labs. These results are submitted pursuant to CA Labs' current terms and conditions of sale, including the company's standard warranty and limitations of liability provisions and no responsibility or liability is assumed for the manner in which the results are used or interpreted. Unless notified in writing to return the samples covered by this report, CA Labs will store the samples for a period of ninety (90) days before discarding. A shipping or handling fee may be assessed for the return of any samples.

AE

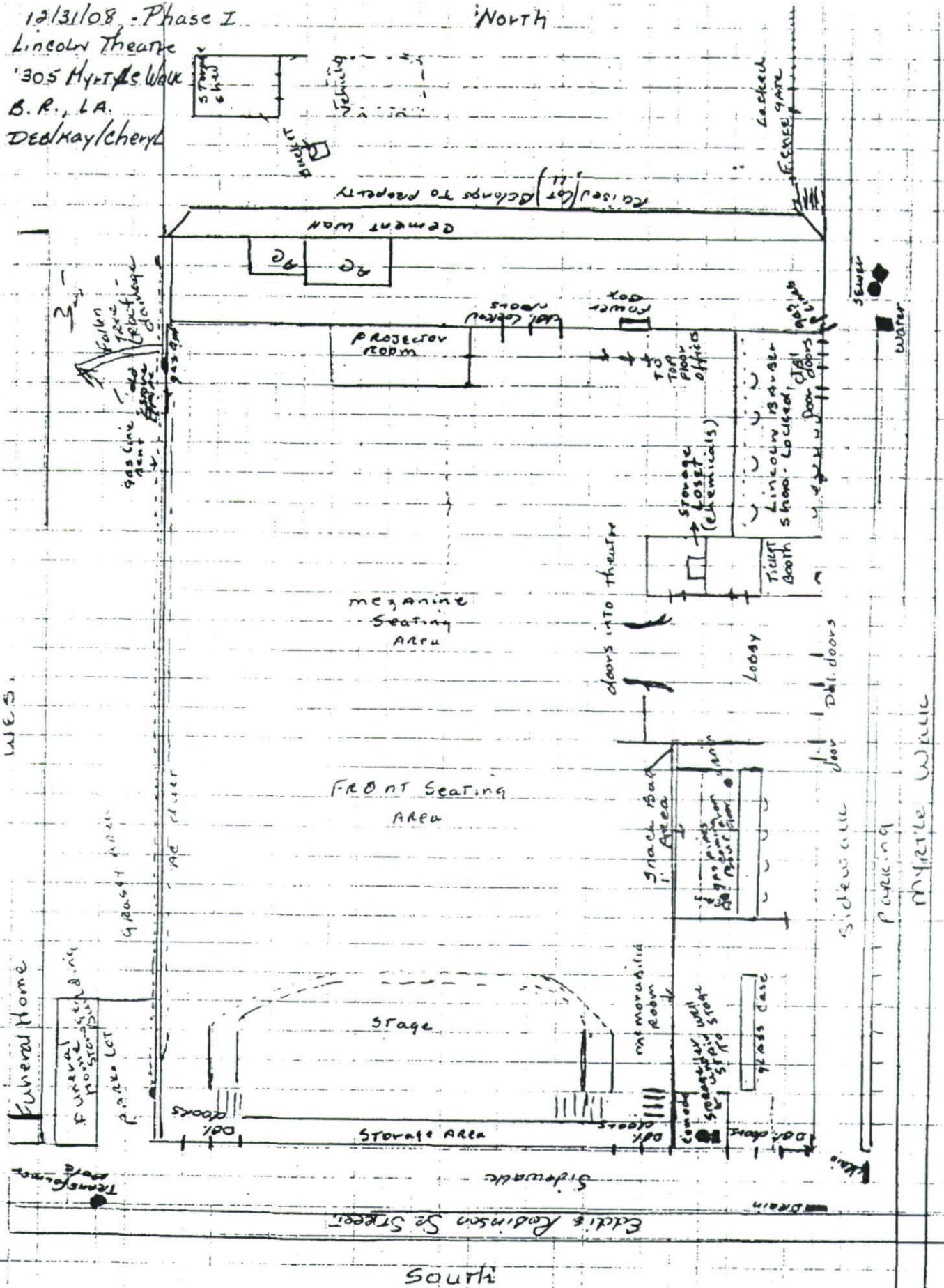
Advanced Environmental Consulting, L.L.C. P. O. Box 82905, Baton Rouge, LA 70884  
 Chain of Custody Record 225-753-4031 Fax 225-753-4033

Laboratory Samples Submitted To:		By: Advanced Environmental Consulting, LLC		
Report Results To: 225-753-4033		Project Name: Lincoln Industrial		
Turnaround Time Requested: 3 days		Project No. 09-041		
Sample No.	Date	Sample Type (bulk, air, water, etc.)	Test(s) (pcm, plm, tem, etc.)	Remarks
1	2/5/09	BULK	RSM	
2				
3				
4				
Advanced Environmental Consulting, L.L.C.			Relinquished By: [Signature]	Date: 2/10/09
Advanced Environmental Consulting, L.L.C.			Received By: [Signature]	Date: _____
			Time: 10:30	Time: _____
				Intact



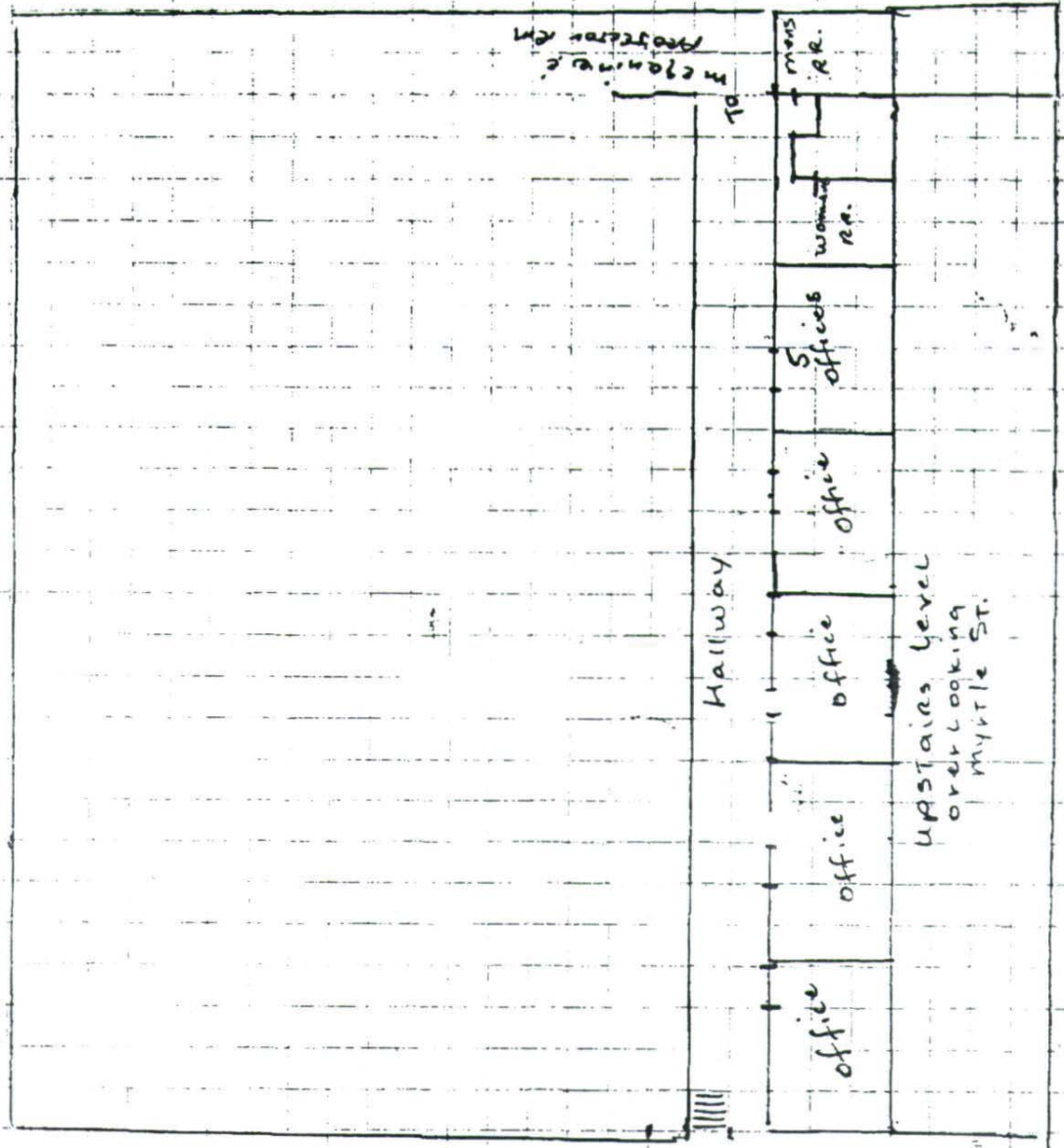
12/31/08 - Phase I  
 Lincoln Theatre  
 305 Myrtle Walk  
 B. R., LA.  
 Deakay/Cheryl

North



South

2nd Floor Layout



TO MECHANICAL ROOM

Hallway

mens R.R.

womens R.R.

5 offices

office

office

office

office

UPstairs level overlooking MYrtle St.

MYrtle street

Eddie Robinson ST.

SURVEY DATA SHEET

**ADVANCED ENVIRONMENTAL CONSULTING**

P. O. BOX 82905

Baton Rouge, LA 70884

225-753-4031 Fax 225-753-4033

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www.advenvir.com

Date: 1/9/09

Page: 1 of 1

Job #: 09-041

Technician: GLJ

Client: Quant.

Type of Survey: Lead in the Air

Building/Area: Luxcan Theater

Project Location: Road 1 Davis

Sample	Description	Location	Quantity
W-1-A	DRINKING HDL CUT 1	BARBER SHOP	
W-2-A	" " CUT 2	" "	
W-3-A	" " CUT 3	" "	
W-4-A	" " CUT 4	" "	
W-1-B	DRINKING HDL CONCESSION AREA	CONCESSION AREA SINK	
W-2-B	" " CUT 2	" "	
W-3-B	" " CUT 3	" "	
W-4-B	" " CUT 4	" "	

FT - floor tile CT - ceiling tile PI - pipe insulation SA - spray applied M - mastic GVP - Bypass T - transit R - roofing SF - square feet LF - linear feet

Asbestos • Lead • Environmental • Materials & Indoor Air Analysis

**EMSL Analytical, Inc.**

3 Cooper St. Westmont, NJ 08108

Phone: (856) 858-4800 Fax: (856) 858-9551

Web: <http://www.emsl.com>

Email: [westmontleadlab@emsl.com](mailto:westmontleadlab@emsl.com)

**FACSIMILE TRANSMITTAL SHEET**

To:   
 Company: **Advanced Environmental Consulting**   
 Fax Number: (225) 753-4033   
 Phone Number: (225) 753-4031

From: **EMSL Analytical**   
 Date: **February 17, 2009**   
 PAGES INCLUDING COVER: **4**

RE: Analysis Results for Order(s) **200901873**

The following report covers the analysis performed on samples submitted to EMSL Analytical on the following date(s):   
 2/12/2009 11:13:00AM

**Notice:** If you are not the stated recipient of this fax and have received this in error, please discard immediately and contact EMSL Analytical at the phone number listed above.

**EMSL Analytical News**

<p><b>EMSL PRODUCTS MONTHLY SPECIALS</b></p> <p><b>Air-o-Cell (50pk) \$199.00</b></p> <p>PCM Cassettes \$24(10+bx)                  TEM Cassettes \$39(10+bx)</p> <p><b><u>PUMP BLOWOUT SALE</u></b></p> <p>EMSL E-Line Pump \$169                  EMSL H/D Diaphragm Pump \$169                  Rotary Vane Sampling Pump \$189</p> <p><b><u>IAQ INSTRUMENT DEALS</u></b></p> <p>35"L Borescope \$275                  Fluke 975V IAQ Meter \$2495                  Protimeter Surveymaster \$485                  Atrix Portable HEPA Vacuum \$225</p> <p>1-888-958-8170 East Coast                  1-888-455-3657 West Coast</p>	<p><b><u>Training - \$249 Per Person</u></b></p> <p><u>To Be Announced</u></p> <p><i>Other Locations Coming Soon</i></p> <p>Register Now!</p> <p><b>1-800 220-3675</b></p> <p>"In the event a product or service is listed at an incorrect price due to typographical, photographic or technical error, EMSL shall have the right to refuse or cancel any orders placed at the incorrect price."</p>	<p><b><u>New Lab Services at EMSL</u></b></p> <p>Liquid and Materials Identification                  Environmental Test Chambers Studies                  Lead in Consumer Products                  Radon Testing Now Available!                  MRSA (Environmental only)                  Legionella -FREE Sampling Bottles                  Food Microbiology                  Hexavalent Chromium                  Asbestos in Soils / Vermiculite</p> <p><b><u>Westmont, NJ Lab Open Saturday</u></b>                  Asbestos, Lead, and Mold Analysis!</p> <p><b>1-800-220-3675 East Coast</b>  <b>1-888-455-3675 West Coast</b></p>
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If you have any questions, please do not hesitate to contact us at (856) 858-4800.

VISIT OUR WEBSITE AT <http://www.emsl.com>

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CERTIFICATIONS OF ACCREDITATIONS AND CHAIN OF CUSTODY FORMS

2009101873

EMSL Relinquish Form  
Revision 2  
Effective Date: July 9, 2007

## EMSL Analytical, Inc. Relinquish Form

Initial Lab:	EMSL - Baton Rouge	Phone Number:	225-755-1920
		Fax Number:	225-755-1989
Relinquished to:	EMSL - Westmont	Phone Number:	
		Fax Number:	
Does new Lab hold equivalent or additional accreditation*			<input checked="" type="radio"/> Yes <input type="radio"/> No
Client Name:	Advanced Environmental Consulting		
Client Project:	09-041 / Lincoln		
Date Received:	2/10/09		
Date Relinquished:	2/10/09		
Date Due:	TAT. 6-10 day		
Special Instructions:	see ccc		
Relinquished by (Signature):	Date:	Received by (Signature):	Date:
<i>[Signature]</i>	2/10/09	<i>[Signature]</i>	2/12/09
Relinquished by (Signature):	Date:	Received by (Signature):	Date:

Thanks!

**Client Notification**- Please sign this form and fax to the original laboratory. By signing below you agree to allow the above named laboratory to relinquish the samples to a new laboratory with equivalent or additional certification.

Name (please Print)	Signature	Agent of:	Date:

If this is a recurring project or sample type that will require samples to be relinquished on a regular basis please sign below and the laboratory will keep this form on file

Name (please Print)	Signature	Agent of:	Date:

• All accreditation information and certificates can be found at [www.emsl.com](http://www.emsl.com).  
Controlled Document  
Confidential Business Information/Property of EMSL Analytical, Inc.

2009/02/13

AE

Advanced Environmental Consulting, I. L. C. P. O. Box 82905, Baton Rouge, LA 70884  
225-753-4031 Fax 225-753-4033

Chain of Custody Record  
www.adenvir.com

Page 1 of 1

Laboratory Samples Submitted To		By: Advanced Environmental Consulting, I.L.C.	
Report Results To: 225-753-4033	Turnaround Time Requested: <u>EMSL</u>	Project Name: <u>L. N. C. W. C. N.</u>	Project No: <u>09-041</u>
Sample No.	Date	Sample Type (bulk, air, water, etc.)	Test(s) (spec. plm. tem, etc.)
W-1-A	2/19/09	WATER	A.A.
W-2-A	}	}	LEAD IN WATER
W-3-A			VERED 15-77-B
W-4-A			SENSITIVITY
W-1-B			
W-2-B			
W-3-B			
W-4-B			
Advanced Environmental Consulting, I. L. C.		Received By: <u>Kathy New</u>	
Retinquired By: <u>[Signature]</u>		Date: <u>2/17/09</u>	Date: <u>2/10/09</u>
		Time: <u>4:30</u>	Time: <u>4:20</u>
		Intact	



**EMSL Analytical**

3 Cooper St, Westmont, NJ 08108

Phone: (856) 253-4800 Fax: (856) 258-9551 Email: westmont@edlab@emsl.com

**Attn: Advanced Environmental Consulting  
PO Box 82905  
Baton Rouge, LA 70884**

**Fac:** (225) 753-4033 **Phone:** (225) 753-4031  
**Project:** Lincoln/ 09-041

**Customer ID:** AECO62  
**Customer PO:**  
**Received:** 02/12/09 11:13 AM  
**EMSL Order:** 200901873  
**EMSL Proj:**

**Report Date:** 2/17/2009

**Lead in Water by Furnace AAS (EPA 200.9)**

<i>Client Sample Description</i>	<i>Lab ID</i>	<i>Collected</i>	<i>Analyzed</i>	<i>Lead Concentration</i>
W-1-A	0001	2/10/2009	2/16/2009	310 ppb
W-2-A	0002	2/10/2009	2/16/2009	98 ppb
W-3-A	0003	2/10/2009	2/16/2009	23 ppb
W-4-A	0004	2/10/2009	2/16/2009	7.3 ppb
W-1-B	0005	2/10/2009	2/16/2009	65 ppb
W-2-B	0006	2/10/2009	2/16/2009	43 ppb
W-3-B	0007	2/10/2009	2/16/2009	21 ppb
W-4-B	0008	2/10/2009	2/16/2009	61 ppb

Shannon Kauffman, Lead Lab Supervisor  
or other approved signatory

The test results contained within this report meet the requirements of NELAP unless otherwise noted. This report applies only to those items tested. Samples received in good condition unless otherwise noted. Quality Control Data associated with this sample set is within acceptable limits, unless otherwise noted.  
ACCREDITATIONS: NJ NELAP: 04853, AEMA Environmental Lead Laboratory Approval Program: 100104

# LEAD PAINT INSPECTION REPORT

REPORT NUMBER: 02/09/09 11:11

INSPECTION FOR: Adv. Environmental Consulting LLC  
PO Box 82906  
Baton Rouge,  
Louisiana 70884

PERFORMED AT: Old Lincoln Theatre  
Baton Rouge, Louisiana  
70802

INSPECTION DATE: 02/09/09

INSTRUMENT TYPE: R M D  
MODEL LPA-1  
XRF TYPE ANALYZER  
Serial Number: 1387

ACTION LEVEL: 1.0 mg/cm<sup>2</sup>

OPERATOR LICENSE: Pb09RA00088

As of 02/09/09,

Yes. Lead based paint was found on this building, but they do not  
cause a lead hazard in the condition they are in at testing.

SIGNER:



Date:

02/09/09

Larry J. Herring  
4001 South Dr.  
New Iberia,  
Louisiana  
70563



**SUMMARY REPORT OF LEAD PAINT INSPECTION FOR: Adv. Environmental Consulting**

Inspection Date:	02/09/09	Old Lincoln Theatre
Report Date:	2/10/2009	1305 Myrtle Walk
Abatement Level:	1.0	Baton Rouge,
Report No.	02/09/09 11:11	Louisiana 70802
Total Readings:	62 Actionable: 4	
Job Started:	02/09/09 11:11	
Job Finished:	02/09/09 13:19	

Reading No.	Wall	Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm <sup>2</sup> )	Mode
<b>Exterior Room 001 Bldg 1</b>									
007	A	Door	Rgt	Door Face	I	Metal	White	1.1	OK
008	A	Door	Rgt	Lft casing	I	Metal	White	1.1	OK
018	B	Door	Rgt	Rgt casing	I	Wood	White	2.3	OK
<b>Interior Room 001 Entry</b>									
027	B	Door	Rgt	Lft casing	I	Wood	White	1.1	OK
<b>Calibration Readings</b>									
----- End of Readings -----									

SEQUENTIAL REPORT OF LEAD PAINT INSPECTION FOR: Adv. Environmental Consulting

Inspection Date: 02/09/09  
 Report Date: 2/10/2009  
 Abatement Level: 1.0  
 Report No. 02/09/09 11:11  
 Total Readings: 62  
 Job Started: 02/09/09 11:11  
 Job Finished: 02/09/09 13:19

Old Lincoln Theatre  
 1305 Myrtle Walk  
 Baton Rouge,  
 Louisiana 70802

Read No.	Rm No.	Room Name	Wall Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm <sup>2</sup> )	Mode
1		CALIBRATION							0.9	TC
2		CALIBRATION							0.9	TC
3		CALIBRATION							1.1	TC
4	001	Bldg 1	A Wall		Rgt	I N/A		N/A	-0.1	QM
5	001	Bldg 1	A Wall		Rgt	I Brick		Red	0.0	QM
6	001	Bldg 1	A Wall		Rgt	I Brick		White	-0.1	QM
7	001	Bldg 1	A Door		Rgt Door Face	I Metal		White	1.1	QM
8	001	Bldg 1	A Door		Rgt Lft casing	I Metal		White	1.1	QM
9	001	Bldg 1	A Wall		Ctr Panel	I Wood		White	-0.1	QM
10	001	Bldg 1	A Wall		Ctr Panel Trim	I Wood		White	-0.2	QM
11	001	Bldg 1	A Wall		Ctr GUTTER	I Wood		Tan	-0.1	QM
12	001	Bldg 1	A Wall		Ctr GUTTER	I Wood		White	0.0	QM
13	001	Bldg 1	B Wall		Rgt EA	I Brick		Tan	-0.1	QM
14	001	Bldg 1	B Wall		Rgt Panel	I Wood		Tan	0.0	QM
15	001	Bldg 1	B Wall		Rgt Panel Trim	I Wood		White	-0.1	QM
16	001	Bldg 1	B Door		Rgt Door Face	I Wood		White	0.1	QM
17	001	Bldg 1	B Door		Rgt Lft casing	I Wood		White	0.1	QM
18	001	Bldg 1	B Door		Rgt Rgt casing	I Wood		White	2.3	QM
19	001	Bldg 1	C Wall		Rgt	I Brick		White	-0.4	QM
20	001	Bldg 1	D Wall		Rgt	I Brick		Tan	0.2	QM
21	001	Bldg 1	D Wall		Rgt Gutter	I Metal		Tan	-0.1	QM
22	001	Entry	A Wall		Ctr	I Drywall		White	0.0	QM
23	001	Entry	B Wall		Ctr	I Drywall		Tan	0.1	QM
24	001	Entry	A Ceiling			I Dry wall		White	0.0	QM
25	001	Entry	A Baseboard		Ctr	I Wood		White	0.1	QM
26	001	Entry	B Door Face		Rgt	I Wood		White	0.0	QM
27	001	Entry	B Door		Rgt Lft casing	I Wood		White	1.1	QM
28	002	Snack Bar	A Ceiling			I Drywall		White	-0.1	QM
29	002	Snack Bar	A Baseboard		Ctr	I Wood		White	-0.1	QM
30	002	Snack Bar	A Wall		Ctr	I Drywall		Red	-0.1	QM
31	002	Snack Bar	B Wall		Ctr	I Drywall		Red	-0.1	QM
32	002	Snack Bar	C Wall		Ctr	I Stucco		Red	0.1	QM
33	002	Snack Bar	A Counter Shf		Ctr	I Wood		White	0.2	QM
34	002	Snack Bar	D Counter Shf		Ctr	I Wood		White	-0.1	QM
35	002	Snack Bar	D Trim		Ctr	I Wood		Red	-0.2	QM
36	003	Mens Bath	B Wall		Ctr	I Stucco		White	0.0	QM
37	003	Mens Bath	C Wall		Ctr	I Stucco		White	0.4	QM
38	003	Mens Bath	A AC Vents		Rgt	I Metal		White	0.0	QM
39	004	Barber Shop	A Ceiling		Ctr	I Dry wall		White	-0.3	QM
40	004	Barber Shop	A Wall		Ctr	I Stucco		White	-0.1	QM
41	004	Barber Shop	B Wall		Ctr	I Stucco		White	-0.1	QM
42	004	Barber Shop	C Wall		Ctr	I Stucco		White	0.2	QM
43	004	Barber Shop	D Wall		Ctr	I Stucco		White	0.2	QM
44	004	Barber Shop	A Wall		Ctr	I Stucco		White	-0.1	QM
45	004	Barber Shop	A Door Face		Ctr	I Wood		Black	0.4	QM
46	004	Barber Shop	A Door		Ctr Lft casing	I Wood		black	0.0	QM
47	004	Barber Shop	A Door Face		Ctr	I Wood		black	0.5	QM

SEQUENTIAL REPORT OF LEAD PAINT INSPECTION FOR: Adv. Environmental Consulting

Read No.	Rm No.	Room Name	Wall	Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm <sup>2</sup> )	Mode
48	004	Barber Shop	A	Door	Lft	Lft casing	I	Wood	black	0.6	QM
49	005	Ladies Bath	A	Window	Lft	Lft Casing	P	Stucco	White	0.3	QM
50	006	Office 5	A	Window	Lft	Lft Casing	P	Stucco	White	-0.1	QM
51	007	THEATER	C	Window	Ctr	Lft Casing	P	Stucco	White	-0.1	QM
52	008	THEATER	A	Wall	Ctr		I	Stucco	White	0.2	QM
53	008	THEATER	A	Wall	Ctr		I	Stucco	Red	0.6	QM
54	008	THEATER	B	Wall	Ctr		I	Stucco	White	0.2	QM
55	008	THEATER	B	Wall	Ctr		I	Stucco	Red	0.1	QM
56	008	THEATER	C	Door	Lft	Door Faces	I	Metal	White	0.6	QM
57	009	THEATER	C	Door	Lft	Lft casing	I	Wood	White	0.5	QM
58	008	THEATER	C	Door	Rgt	Door Faces	I	Metal	White	0.7	QM
59	008	THEATER	C	Door	Rgt	Lft casing	I	Wood	White	0.6	QM
60		CALIBRATION								1.1	TC
61		CALIBRATION								1.1	TC
62		CALIBRATION								1.1	TC

---- End of Readings ----

DETAILED REPORT OF LEAD PAINT INSPECTION FOR: Adv. Environmental Consulting

Inspection Date: 02/09/09 Old Lincoln Theatre  
 Report Date: 2/10/2009 1305 Myrtle Walk  
 Abatement Level: 1.0 Baton Rouge,  
 Report No. 02/09/09 11:11 Louisiana 70802  
 Total Readings: 62  
 Job Started: 02/09/09 11:11  
 Job Finished: 02/09/09 13:19

Reading No.	Wall	Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm <sup>2</sup> )	Mode
<b>Exterior Room 001 Bldg 1</b>									
009	A	Wall	Ctr	Panel	I	Wood	White	-0.1	QM
010	A	Wall	Ctr	Panel Trim	I	Wood	White	-0.2	QM
011	A	Wall	Ctr	GUTTER	I	Wood	Tan	-0.1	QM
012	A	Wall	Ctr	GUTTER	I	Wood	White	0.0	QM
005	A	Wall	Rgt		I	Brick	Red	0.0	QM
006	A	Wall	Rgt		I	Brick	White	-0.1	QM
007	A	Door	Rgt	Door Face	I	Metal	White	1.1	QM
008	A	Door	Rgt	Lft casing	I	Metal	White	1.1	QM
004	A	Wall	Rgt		I	N/A	N/A	-0.1	QM
013	B	Wall	Rgt	KA	I	Brick	Tan	-0.1	QM
014	B	Wall	Rgt	Panel	I	Wood	Tan	0.0	QM
015	B	Wall	Rgt	Panel Trim	I	Wood	White	-0.1	QM
016	B	Door	Rgt	Door Face	I	Wood	White	0.1	QM
018	B	Door	Rgt	Rgt casing	I	Wood	White	2.3	QM
017	B	Door	Rgt	Lft casing	I	Wood	White	0.1	QM
019	C	Wall	Rgt		I	Brick	White	-0.4	QM
020	D	Wall	Rgt		I	Brick	Tan	0.2	QM
021	D	Wall	Rgt	Gutter	I	Metal	Tan	-0.1	QM
<b>Interior Room 001 Entry</b>									
024	A	Ceiling			I	Dry wall	White	0.0	QM
022	A	Wall	Ctr		I	Drywall	White	0.0	QM
025	A	Baseboard	Ctr		I	Wood	White	0.1	QM
027	B	Door	Rgt	Lft casing	I	Wood	White	1.1	QM
023	B	Wall	Ctr		I	Drywall	Tan	0.1	QM
026	B	Door Face	Rgt		I	Wood	White	0.0	QM
<b>Interior Room 002 Snack Bar</b>									
028	A	Ceiling			I	Drywall	White	-0.1	QM
029	A	Baseboard	Ctr		I	Wood	White	-0.1	QM
030	A	Wall	Ctr		I	Drywall	Red	-0.1	QM
033	A	Counter Shf	Ctr		I	Wood	White	0.2	QM
031	B	Wall	Ctr		I	Drywall	Red	-0.1	QM
032	C	Wall	Ctr		I	Stucco	Red	0.1	QM
034	D	Counter Shf	Ctr		I	Wood	White	-0.1	QM
035	D	Trim	Ctr		I	Wood	Red	-0.2	QM
<b>Interior Room 003 Mens Bath</b>									
038	A	AC Vents	Rgt		I	Metal	White	0.0	QM
036	B	Wall	Ctr		I	Stucco	White	0.0	QM
037	C	Wall	Ctr		I	Stucco	White	0.4	QM
<b>Interior Room 004 Barber Shop</b>									
048	A	Door	Lft	Lft casing	I	Wood	black	0.6	QM
046	A	Door	Ctr	Lft casing	I	Wood	black	0.0	QM
039	A	Ceiling	Ctr		I	Dry wall	White	-0.3	QM
040	A	Wall	Ctr		I	Stucco	White	-0.1	QM
044	A	Wall	Ctr		I	Stucco	White	-0.1	QM
045	A	Door Face	Ctr		I	Wood	Black	0.4	QM

DETAILED REPORT OF LEAD PAINT INSPECTION FOR: Adv. Environmental Consulting

Reading No.	Wall	Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm <sup>2</sup> )	Mode
047	A	Door Face	Ctr		I	Wood	black	0.5	QM
041	B	Wall	Ctr		I	Stucco	White	-0.1	QM
042	C	Wall	Ctr		I	Stucco	White	0.2	QM
043	D	Wall	Ctr		I	Stucco	White	0.2	QM
Interior Room 005 Ladies Bath									
049	A	Window	Lft	Lft Casing	P	Stucco	White	0.3	QM
Interior Room 006 Office 5									
050	A	Window	Lft	Lft Casing	P	Stucco	White	-0.1	QM
Interior Room 007 THEATER									
051	C	Window	Ctr	Lft Casing	P	Stucco	White	-0.1	QM
Interior Room 008 THEATER									
052	A	Wall	Ctr		I	Stucco	White	0.2	QM
053	A	Wall	Ctr		I	Stucco	Red	0.6	QM
054	B	Wall	Ctr		I	Stucco	White	0.2	QM
055	B	Wall	Ctr		I	Stucco	Red	0.1	QM
056	C	Door	Lft	Door Faces	I	Metal	White	0.6	QM
058	C	Door	Rgt	Door Faces	I	Metal	White	0.7	QM
059	C	Door	Rgt	Lft casing	I	Wood	White	0.6	QM
Interior Room 009 THEATER									
057	C	Door	Lft	Lft casing	I	Wood	White	0.5	QM
Calibration Readings									
001								0.9	TC
002								0.9	TC
003								1.1	TC
060								1.1	TC
061								1.1	TC
062								1.1	TC

---- End of Readings ----

**DISTRIBUTION REPORT OF LEAD PAINT INSPECTION FOR: Adv. Environmental Consulting**

Inspection Date: 02/09/09  
 Report Date: 2/10/2009  
 Abatement Level: 1.0  
 Report No. 02/09/09 11:11  
 Total Reading Sets: 56  
 Job Started: 02/09/09 11:11  
 Job Finished: 02/09/09 13:19

Old Lincoln Theatre  
 1305 Myrtle Walk  
 Baton Rouge,  
 Louisiana 70802

Structure	Total	Structure Distribution		
		Positive	Negative	Inconclusive
AC Vents	1	0 <0%>	1 <100%>	0 <0%>
Baseboard	2	0 <0%>	2 <100%>	0 <0%>
Ceiling	3	0 <0%>	3 <100%>	0 <0%>
Counter Shf	2	0 <0%>	2 <100%>	0 <0%>
Door Door Face	2	1 <50%>	1 <50%>	0 <0%>
Door Door Faces	2	0 <0%>	2 <100%>	0 <0%>
Door Face	3	0 <0%>	3 <100%>	0 <0%>
Door Lft casing	7	2 <29%>	5 <71%>	0 <0%>
Door Rgt casing	1	1 <100%>	0 <0%>	0 <0%>
Trim	1	0 <0%>	1 <100%>	0 <0%>
Wall	21	0 <0%>	21 <100%>	0 <0%>
Wall Gutter	3	0 <0%>	3 <100%>	0 <0%>
Wall KA	1	0 <0%>	1 <100%>	0 <0%>
Wall Panel	2	0 <0%>	2 <100%>	0 <0%>
Wall Panel Trim	2	0 <0%>	2 <100%>	0 <0%>
Window Lft Casing	3	0 <0%>	3 <100%>	0 <0%>
<b>Inspection Totals:</b>	<b>56</b>	<b>4 &lt; 7%&gt;</b>	<b>52 &lt; 93%&gt;</b>	<b>0 &lt; 0%&gt;</b>

**From:** Glenn Johnson  
**To:** Kay Nall;  
**Subject:** RE: email address for revised results  
**Date:** Thursday, February 19, 2009 9:53:41 AM  
**Attachments:** CCF02192009\_00000.pdf

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There were 15 sample locations of paint on walls on the interior of the structure.  
None of the sampled surfaces on the interior came back positive for lead above regulatory limits.

The only positive samples were on exterior of entrance door.

Hope this helps.

Glenn L. Johnson  
Advanced Environmental Consulting, LLC  
P. O. Box 82905  
Baton Rouge, LA 70884

Office 225-753-4031 Fax 225-753-4033

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**From:** Kay Nall [mailto:knal@qri.com]  
**Sent:** Thursday, February 19, 2009 9:35 AM  
**To:** gjohnson@advenvir.com  
**Subject:** email address for revised results

Glenn,

I wanted to give you my email address so that you can send the revised report to me for the Lincoln Theater results.

Thanks.

**Kay S. Nall**

Vice President, Technical Services

**QUATERNARY RESOURCE INVESTIGATIONS, L.L.C.**

US SBA 8(a) • US SBA SDB • US WBE • LA DBE • Houston W/DBE • DFW W/DBE

Baton Rouge ♦ Houston

*Government & Industry in Harmony with the Environment*

13588 Florida Blvd.

Baton Rouge, LA 70819

02091111.TXT

LEAD PAINT INSPECTION REPORT

REPORT NUMBER: 02/09/09 11:11  
 INSPECTION FOR: Adv. Environmental Consulting  
 PERFORMED AT: Old Lincoln Theatre  
 1305 Myrtle walk  
 Baton Rouge,  
 Louisiana 70802  
 INSPECTION DATE: 02/09/09  
 INSTRUMENT TYPE: R M D  
 MODEL LPA-1  
 XRF TYPE ANALYZER  
 Serial Number: 1387  
 ACTION LEVEL: 1.0 mg/cm\*\*2  
 OPERATOR LICENSE: Pb09RA00088  
 STATEMENT: As of 02/09/09,  
 yes, lead based paint was found on this building.

SIGNED \_\_\_\_\_ DATE \_\_\_\_\_  
 Env. Services Group LLC  
 Lanny J. Herring  
 4001 South Dr.  
 New Iberia,  
 Louisiana 70563

SEQUENTIAL REPORT OF LEAD PAINT INSPECTION FOR: Adv. Environmental Consulting

Inspection Date: 02/09/09  
 Report Date: 2/10/2009  
 Abatement Level: 1.0  
 Report No. 02/09/09 11:11  
 Total Readings: 62  
 Job Started: 02/09/09 11:11  
 Job Finished: 02/09/09 13:19  
 Old Lincoln Theatre  
 1305 Myrtle walk  
 Baton Rouge,  
 Louisiana 70802

Read NO. Rm Mode	Room Name	wall Structure	Location	Member	Paint Cond Substrate	Paint Color	Lead (mg/cm <sup>2</sup> )
1	CALIBRATION						0.9
TC 2	CALIBRATION						0.9
TC 3	CALIBRATION						1.1
TC 4 QM	001 Bldg 1	A wall	Rgt		I N/A	N/A	-0.1



			02091111.TXT			
5	001 Bldg 1	A wall	Rgt	I Brick	Red	0.0
QM						
6	001 Bldg 1	A wall	Rgt	I Brick	white	-0.1
QM						
7	001 Bldg 1	A Door	Rgt Door Face	I Metal	white	1.1
QM						
8	001 Bldg 1	A Door	Rgt Lft casing	I Metal	white	1.1
QM						
9	001 Bldg 1	A wall	Ctr Panel	I Wood	white	-0.1
QM						
10	001 Bldg 1	A wall	Ctr Panel Trlm	I Wood	white	-0.2
QM						
11	001 Bldg 1	A wall	Ctr GUTTER	I Wood	Tan	-0.1
QM						
12	001 Bldg 1	A wall	Ctr GUTTER	I Wood	white	0.0
QM						
13	001 Bldg 1	B wall	Rgt NA	I Brick	Tan	-0.1
QM						
14	001 Bldg 1	B wall	Rgt Panel	I Wood	Tan	0.0
QM						
15	001 Bldg 1	B wall	Rgt Panel Trlm	I Wood	white	-0.1
QM						
16	001 Bldg 1	B Door	Rgt Door Face	I Wood	white	0.1
QM						
17	001 Bldg 1	B Door	Rgt Lft casing	I Wood	white	0.1
QM						
18	001 Bldg 1	B Door	Rgt Rgt casing	I Wood	white	2.3
QM						
19	001 Bldg 1	C wall	Rgt	I Brick	white	-0.4
QM						
20	001 Bldg 1	D wall	Rgt	I Brick	Tan	0.2
QM						
21	001 Bldg 1	D wall	Rgt Gutter	I Metal	Tan	-0.1
QM						
22	001 Entry	A wall	Ctr	I Drywall	white	0.0
QM						
23	001 Entry	B wall	Ctr	I Drywall	Tan	0.1
QM						
24	001 Entry	A Ceiling		I Dry wall	white	0.0
QM						
25	001 Entry	A Baseboard	Ctr	I Wood	white	0.1
QM						
26	001 Entry	C Door Face	Rgt	I wood	white	0.0
QM						
27	001 Entry	C Door	Rgt Lft casing	I Wood	white	1.1
QM						
28	002 Snack Bar	A Ceiling		I Drywall	white	-0.1
QM						
29	002 Snack Bar	A Baseboard	Ctr	I wood	white	-0.1
QM						
30	002 Snack Bar	A wall	Ctr	I Drywall	Red	-0.1
QM						
31	002 Snack Bar	B wall	Ctr	I Drywall	Red	-0.1
QM						
32	002 Snack Bar	C wall	Ctr	I Stucco	Red	0.1
QM						
33	002 Snack Bar	A Counter Shf	Ctr	I Wood	white	0.2
QM						
34	002 Snack Bar	D Counter Shf	Ctr	I Wood	white	-0.1
QM						
35	002 Snack Bar	D Trim	Ctr	I Wood	Red	-0.2
QM						
36	003 Mens Bath	B Wall	Ctr	I Stucco	white	0.0

## 02091111.TXT

QM	37	003 Mens Bath	C wall	Ctr	I Stucco	white	0.4	
QM	38	003 Mens Bath	A AC Vents	Rgt	I Metal	white	0.0	
QM	39	004 Barber Shop	A Ceiling	Ctr	I Dry wall	white	-0.3	
QM	40	004 Barber Shop	A wall	Ctr	I Stucco	white	-0.1	
QM	41	004 Barber Shop	B wall	Ctr	I Stucco	white	-0.1	
QM	42	004 Barber Shop	C wall	Ctr	I Stucco	white	0.2	
QM	43	004 Barber Shop	A Door Face	Ctr	I wood	Black	0.2	
QM	44	004 Barber Shop	A Door	Ctr Lft casing	I wood	Black	-0.1	
QM	45	004 Barber Shop	A Door Face	Ctr	I wood	Black	0.4	
QM	46	004 Barber Shop	A Door	Ctr Lft casing	I wood	black	0.0	
QM	47	005 Ladies Bath	A window	lft Lft casing	P Stucco	white	0.	
QM	48	005 Ladies Bath	A wall	Ctr I wood	P Stucco	black		
0.6	QM	49	005 Ladies Bath	B wall	Ctr	P Stucco	white 0.3	
QM	50	006 Office 5	A window	Lft Lft Casing	P Stucco	white	-0.1	
QM	51	006 Office 5	B wall	Ctr	P Stucco	white	-0.1	
QM	52	006 Office 5	C wall	Ctr	I Stucco	white	0.2	
QM	53	008 THEATER	A wall	Ctr	I Stucco	Red	0.6	
QM	54	008 THEATER	C wall	Ctr	I Stucco	white	0.2	
QM	55	008 THEATER	D wall	Ctr	I Stucco	Red	0.1	
QM	56	008 THEATER	C Door	Lft Door Faces	I Metal	white	0.6	
QM	57	009 THEATER	C Door	Lft Lft casing	I wood	white	0.5	
QM	58	008 THEATER	C Door	Rgt Door Faces	I Metal	white	0.7	
QM	59	008 THEATER	C Door	Rgt Lft casing	I wood	white	0.6	
QM	60	CALIBRATION						1.1
TC	61	CALIBRATION						1.1
TC	62	CALIBRATION						1.1
TC								

---- End of Readings ----

BOBBY JINDAL  
GOVERNOR



PEGGY M. HATCH  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

**JUL 16 2010**

Certified Mail- 7006 0810 0003 0355 7463  
Return Receipt Requested

Mr. Melvin "Kip" Holden, President  
East Baton Rouge Parish  
Post Office Box 1471  
Baton Rouge, LA 70821

RE: Closure of an Emergency Disaster Cleanup Site  
East Baton Rouge Parish - BREC N Sherwood Forest Blvd, Ward's Creek, and LSU Ag Center  
Debris Sites, AI 160657, 160701, and 163330  
East Baton Rouge Parish

Dear Mr. Holden:

The Louisiana Department of Environmental Quality (LDEQ), granted East Baton Rouge Parish authorization to use the above-referenced sites as temporary locations for the management of hurricane generated debris associated with the aftermath of Hurricanes Gustav and Ike.

On June 29, 2010, inspections were conducted by the LDEQ to ensure that the sites have been closed in accordance with the requirements of our Debris Management Plan. Based upon the evaluation performed during the site visits, it has been determined that the Parish has completed the debris management activities and the necessary closure requirements. Therefore, the subject sites are hereby considered closed and shall not accept or process any additional Hurricanes Gustav and Ike generated debris.

If you have any questions regarding this matter, please contact Dr. Lorna Putnam Duhon of the Waste Permits Division at (225) 219-3139.

Sincerely,

A handwritten signature in cursive script that reads "Sam Phillips".

Sam Phillips  
Administrator

lapd

c: Bobby Mayweather, Capital Regional Office  
Phyllis Luke



**SOLID WASTE PERMITS ROUTING/APPROVAL SLIP**



AI No.	160657, 160701, 163330	Company/Facility	East Baton Rouge Parish – BREC, Ward’s Creek and LSU Ag Center Debris Sites		Date Routed	7/6/10
SW ID No.	N/A	Parish	East Baton Rouge		Permit Type	<input type="checkbox"/> I <input type="checkbox"/> I-A <input type="checkbox"/> II <input type="checkbox"/> II-A <input type="checkbox"/> III <input type="checkbox"/> Waste Tire
Permit No.	N/A	TEMPO Activity No.	PER20080001 and 20090001 (163330)		Originator	Lorna Putnam
<input type="checkbox"/> Tech. Complete Application	<input type="checkbox"/> Draft Permit	<input type="checkbox"/> Final Permit	<input type="checkbox"/> Major Modification	<input type="checkbox"/> Minor Modification	<input type="checkbox"/> Order to Close	
<input type="checkbox"/> Order to Commence	<input type="checkbox"/> Closure Plan	<input type="checkbox"/> NOD/Technical Review	<input type="checkbox"/> Extension	<input checked="" type="checkbox"/> Correspondence	<input type="checkbox"/> Other	
Description of Document: Closure of Gustav debris sites						
1. Technical Review	Date Received	Date Returned to Originator, if done	Comments	Approved/Initials	Date Forwarded	
ES				<i>AP</i>	7/6	
Engineering						
Geology						
Fin. Assurance						
Tech. Advisor						
Legal						
Other						
2. Management Review	Date Received	Date Returned to Originator, if done	Comments	Approved/Initials	Date Forwarded	
Supervisor			>manager	GB	7/7/10	
Manager	7/7			<i>JAP</i>	7/8/10	
Administrator					7/14/10	
Asst. Secretary						
Secretary						
3. Waste Permits routed to the Asst. Secretary of OES			Comments (If additional space is needed, use continuation sheet)			
a. Were public comments received? <input type="checkbox"/> Y <input type="checkbox"/> N			If yes, provide comments.			
b. Is a Basis For Decision document included? <input type="checkbox"/> Y <input type="checkbox"/> N						
c. Is a Reasons For Denial document included? <input type="checkbox"/> Y <input type="checkbox"/> N						
d. Is financial assurance in place? <input type="checkbox"/> Y <input type="checkbox"/> N			If no, provide comments.			
e. Are there any outstanding fees? <input type="checkbox"/> Y <input type="checkbox"/> N			If yes, provide comments.			
f. Are there any unresolved enforcement actions? <input type="checkbox"/> Y <input type="checkbox"/> N			If yes, provide comments.			
g. Are there adverse effects on coastal protection and restoration? <input type="checkbox"/> Y <input type="checkbox"/> N			If yes, provide comments.			
h. If the answer to 3.g. is yes, does the facility have a coastal use permit? <input type="checkbox"/> Y <input type="checkbox"/> N			If no, provide comments.			
i. Include a copy of the IT questions (responses to LAC 33:VII.523) from the technically complete permit application in the folder, if not already included in a Basis For Decision or Reasons For Denial.						
4. Orders to Commence routed to the Asst. Secretary of OES			Comments (If additional space is needed, use continuation sheet)			
a. Does Executive Order BJ2009-7 apply? <input type="checkbox"/> Y <input type="checkbox"/> N			If yes, include copy of zoning documentation. If no, provide comments.			
		Include copy in folder.	Include copy in folder.	Include copy in folder.		
<input type="checkbox"/> TEMPO Data Entry Completed		Date Completed				

BOBBY JINDAL  
GOVERNOR



HAROLD LEGGETT, PH.D.  
SECRETARY

State of Louisiana  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

FEB 27 2009

CERTIFIED MAIL #: 7005 0390 0006 1027 2617  
CERTIFIED MAIL RETURN RECEIPT

Mr. Dale Frederick  
LSU Agricultural Center  
J. Norman Efferson Hall  
Baton Rouge, LA 70803

RE: Temporary Storm Debris Management Approval  
Parish AI#159122  
Gustav AI#160278

Dear Mr. Frederick:

Due to the widespread damage caused by Hurricane Gustav, the Louisiana Department of Environmental Quality (LDEQ), Office of Environmental Services, Waste Permits Division issues this approval to LSU Agricultural Center to operate temporary storm debris (vegetative debris) management areas. Interim approval was previously granted by the department for these activities. Formal approval is now granted by the department for the sites listed below:

Site Name	Site AI#	Activity
1. LSU Agricultural Center	163330	Chip/Grind

This approval will allow for more efficient and expeditious management of the high volumes of storm debris resulting from Hurricane Gustav and is valid for sixty days (60) from the date of this letter or until the Declaration of Emergency and Administrative Order issued August 31, 2008 and subsequent amendments and extensions terminate, whichever is longer. However, the LDEQ reserves the right to reduce, rescind or extend the timeframe of this temporary approval.

Please be aware that this letter does not authorize the onsite disposal of any kind. A separate request for purposes other than the activity which is approved in this letter must be submitted to and approved by the LDEQ. Additionally, a copy of this letter must be maintained at the operation site at all times. It is the responsibility of the LSU Agricultural Center contracting authority to provide the operator a copy of this letter and any applicable operational criteria.

It is imperative that the debris collected as a result of this emergency event be managed not only in an environmentally sound manner, but also in accordance with the appropriate LDEQ rules and regulations

governing the storage and processing of this type of waste. The applicant/ LSU Agricultural Center requesting the debris site(s) as well as the site operator(s)/contractor, are responsible for compliance with the appropriate LDEQ rules and regulations. Failure to comply with these rules and regulations may result in a formal referral to the Enforcement Division and the possible issuance of civil orders and/or assessment of civil penalties.

If you have any questions concerning this matter, please contact Elizabeth Kashefi at 225-219-3068.

Sincerely,



Cheryl Sonnier Nolan  
Assistant Secretary

EC: Regional Office  
Toni Evans  
Betty Brousseau  
Daniel Lambert  
David Oge'  
\_DEQ-Gustimline

Attachment

# Weekly Debris Management Report

REVISED - SEPTEMBER 15, 2008

Louisiana Comprehensive Plan for Disaster Clean Up and Debris Management mandates that vegetative debris intended for final disposal in a landfill shall be reduced fifty percent by volume and fifty percent by weight prior to the landfill. (See La. R.S. 30:2413.1)  
 SUBMIT COMPLETED FORM TO THE LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY EACH WEEK, STARTING SUNDAY SEPTEMBER 21, 2008. FORMS SHALL BE SUBMITTED NO LATER THAN EACH SUNDAY.

Parish: \_\_\_\_\_  
 Site Location: \_\_\_\_\_  
 Primary Interest #: \_\_\_\_\_  
 Contact Person: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_

Contractor: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_

REPORTING DATES: \_\_\_\_\_ to \_\_\_\_\_

	VOLUME	WEIGHT	
Volume of Vegetative Debris Received <u>This Week</u> : _____	cubic yards	tons	(Use Scale or Divide Cubic Yards by 6 to determine tons. Please See Attached Instructions)
Volume of Vegetative Debris Received <u>To Date</u> : _____	cubic yards	tons	
Volume of Vegetative Debris Processed <u>This Week</u> : CHIPPED _____	cubic yards	tons	
BURNED _____	cubic yards	tons	
OTHER _____	cubic yards	tons	
Volume of Vegetative Debris Processed <u>To Date</u> : CHIPPED _____	cubic yards	tons	
BURNED _____	cubic yards	tons	
OTHER _____	cubic yards	tons	
Volume of Vegetative Debris Recycled (Used as Fuel, Etc. - Please Specify _____) <u>This Week</u> : _____	cubic yards	tons	
Volume of Vegetative Debris Recycled (Used as Fuel, Etc. - Please Specify _____) <u>To Date</u> : _____	cubic yards	tons	
Volume of Vegetative Debris Sent to Landfill For Final Disposal <u>This Week</u> : _____	cubic yards	tons	
Volume of Vegetative Debris Sent to Landfill For Final Disposal <u>To Date</u> : _____	cubic yards	tons	
	cubic yards	tons	
	cubic yards	tons	

BY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR OBTAINING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR PROVIDING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

Name/Title of Responsible Party - Typed or Printed \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

Please Fax or Email this Form to Kathryn Luzza, Ph.D.  
 Fax: (225) 219-3158  
 Email: kathryn.luzza@le.gov  
 Phone: (225) 219-3007

Instructions for Completing the  
Weekly Debris Management Report\*

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The State of Louisiana Comprehensive Plan for Disaster Clean Up and Debris Management mandates that vegetative debris intended for final disposal in a landfill shall be reduced fifty percent by volume and fifty percent by weight prior to transport to the landfill. (See La. R.S. 30:2413.1)

In an effort to encourage recycling, the beneficial use of vegetative debris, and the efficient management of debris generated by Hurricane Gustav, the Department of Environmental Quality (LDEQ) will require all debris management sites to submit a Weekly Debris Management Report. These weekly reports will indicate the volume and weight of debris received, processed, recycled, and finally disposed in a landfill.

Volumes and weights can be determined using the following methods:

1. Debris Weight is preferably measured by using a scale. If no scale is available, determine the debris weight using the following volume to weight conversion factor:

---

$$\text{Cubic yards of debris} \div 6 = \text{tons of debris}$$

---

Do not use the conversion factor of "6" if a scale or other approved method is utilized to determine the weight. Please use the same method to determine the weight of received, processed, and disposed debris.

2. Truck Capacity = length \* width \* height of the truck bed
3. Net Truck Volume = Truck Capacity \* % full (for a full truck load assume 1)  
Other approved FEMA methods may be used. Please document on the form which method is used.
4. Volume of Vegetative Debris Received = Sum of all Net Truck Volumes
5. Volume of Vegetative Debris Processed (i.e. chipped, burned, etc.) is the quantity of the vegetative debris received that was sent for processing.
6. Volume of Vegetative Debris Recycled (used as fuel, etc.) is the quantity of the vegetative debris received that was sent for a beneficial use.
7. Volume of Vegetative Debris sent to a Landfill for Final Disposal is the quantity of the vegetative debris received that was sent to a landfill for final disposal.

\*Please note that the Weekly Debris Management Report shall be submitted to the LDEQ no later than each Sunday beginning Sunday, September 21, 2008. The report must be true, accurate, and complete. Failure to properly complete the report could subject the responsible party to civil and/or criminal penalties. Furthermore, failure to submit an accurate report timely could subject the responsible party to enforcement action by the



### Temporary Chipping and Grinding Operation Criteria

1. Access to the site must be controlled to prevent unauthorized dumping and scavenging;
  2. The site must have spotters to correctly identify and segregate waste types for appropriate management;
  3. All other applicable requirements contained in the Emergency Declaration must be followed;
  4. The site is limited to managing debris indicated in the Department's letter of approval;
  5. Unless otherwise approved by the Department in response to a written request from you, the site must cease operation, and all Hurricane Gustav-generated debris must be removed from the site within sixty days (60) days upon the expiration of this letter, the Emergency Declaration or the subsequent amendments or extensions whichever is longer;
- 
6. Debris piles, including chips, shredded material shall be managed in accordance with the Comprehensive Plan for Disaster Clean-up and Debris Management;
  7. Vehicles used to transport trees, tree limbs, construction materials, or metals shall contain such waste without allowing materials to fall or blow off the vehicle, in accordance with Louisiana environmental regulations (see LAC 33:VII.505.A.2).
  8. Upon completion of this activity, the site must be cleared in accordance with the Comprehensive Plan for Disaster Clean-up and Debris Management and as directed by LDEQ;
  9. Keep records of approximate volumes of vegetative debris chipped or ground and submit the information on the attached Weekly Debris Management Report to the LDEQ, Office of Environmental Services, Waste Permits Division on each Sunday, starting September 21, 2008. The report should include Agency Interest # for this location.

LDEQ contact: Linda M. Brown

(225) 219-3070

[linda.brown@la.gov](mailto:linda.brown@la.gov)



WASTE PERMITS ROUTING/APPROVAL SLIP



159122

AI No.	160278	Company/Fac	LSU Ag Center	Date Routed	2/25/2009
ID No.		Location	EBR	Permit Type	<input type="checkbox"/> HW <input checked="" type="checkbox"/> SW <input type="checkbox"/> Other
Permit No.		Activity No.		Originator	Elizabeth Kashefi

Tech Complete Application	Draft Permit	Final Permit	Minor Mod	Major Mod	NOD	Corresp.	Closure Plan	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Description of Document: Gustav Debris Site Approval

1. Technical Review	Date	Initials	Return to Originator	Comments
ES <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Engineering <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Geology <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Financial Assurance <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Technical Advisor <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Legal <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Other <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
2. Management Review	Date	Initials	Return to Originator	Comments
Supervisor <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Manager <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Administrator <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Assistant Secretary <input checked="" type="checkbox"/>	2/25/09	CSW	<input type="checkbox"/> Y <input type="checkbox"/> N	
Secretary <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Other <input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	

TEMPO Data Entry Completed (Date Completed) 22 April 2009

<p style="text-align: center;"><b>MAIL COMPLETED FORM TO:</b></p> <p style="text-align: center;">LDEQ/OES/ Environmental Assistance Division/CAS PO Box 4313 Baton Rouge, LA 70821-4313</p>	<p>United States Environmental Protection Agency and <b>STATE OF LOUISIANA</b></p> <p><b>DEPARTMENT OF ENVIRONMENTAL QUALITY</b></p> <p><b>NOTIFICATION OF HAZARDOUS WASTE ACTIVITY</b></p> <p><b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b></p>	
<p><b>1. Reason for Submittal</b></p> <p>CHOOSE ONLY ONE REASON PER SUBMITTAL</p>	<p><b>A. Reason for Submittal:</b></p> <p><input checked="" type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).</p> <p><input type="checkbox"/> To provide subsequent notification (to update site identification information).</p> <p style="text-align: center;">or</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application.</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____).</p> <p style="text-align: center;">or</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report.</p> <hr/> <p><b>B. Number of Employees:</b></p>	
<p><b>2. Site EPA ID Number</b></p>	<p>EPA ID Number: <span style="color: red; font-size: 1.2em;">LAR060073932</span> <span style="color: red; font-size: 1.2em; margin-left: 20px;">AI 51443</span> ✓</p>	
<p><b>3. Site Name</b></p>	<p>Legal Name: US. EPA/McKinley H.S. Mercury Spill</p>	
<p><b>4. Site Location</b> (Physical address, NOT PO Box or Route)</p>	<p>Street Address: 800 E. McKinley St.</p> <hr/> <p>City, Town, or Village: Baton Rouge <span style="float: right;">State: Louisiana</span></p> <hr/> <p>County/Parish Name: East Baton Rouge <span style="float: right;">Zip Code: 70802</span></p>	
<p><b>5. Site Land Type</b></p>	<p>Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>	
<p><b>6. North American Industry Classification System (NAICS) Code(s)</b></p>	<p>A.</p>	<p>B.</p>
	<p>C.</p>	<p>D.</p>
<p><b>7. Site Mailing Address</b></p>	<p>Street or P. O. Box:</p> <hr/> <p>City, Town, or Village: Same</p> <hr/> <p>State:</p> <hr/> <p>County/Parish Name: <span style="float: right;">Zip Code:</span></p>	
<p><b>8. Site Contact Person</b></p>	<p>First Name: Mark <span style="float: right;">MI:</span></p> <hr/> <p>Phone Number: 214-665-2705 <span style="float: right;">Last Name: Hayes</span></p> <hr/> <p>Phone Number Extension:</p>	
<p><b>9. Legal Owner and Operator of the Site (see instructions)</b></p>	<p>A. Name of Site's Legal Owner: <span style="float: right;">Date Became Owner (mm/dd/yyyy):</span></p> <hr/> <p>Owner Type: <input type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <hr/> <p>B. Name of Site's Operator: McKinley H.S. <span style="float: right;">Date Became Operator (mm/dd/yyyy):</span></p> <hr/> <p>Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <span style="float: right;">1961</span></p>	

**Kegs & Certs**

Lm RCRA Info 8/12/11  
Lm TEMPO 8/12/11

**10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes)**

**A. Hazardous Waste Activities**

**1. Generator of Hazardous Waste**

(Select one of the following categories)

- a. LQG: Greater than 1,000 kg/mo (2,200 lbs.) Non-acute hazardous waste; or
- b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs.) Non-acute hazardous waste; or
- c. CESQG: Less than 100 kg/mo Non-acute hazardous waste
- d. NON-GENERATOR

In addition, indicate other generator activities (check all that apply)

- e. United States importer of Hazardous Waste
- f. Mixed Waste (hazardous and radioactive) Generator

For items 2 through 6, check all that apply:

- 2. Transporter of Hazardous Waste**
  - Transfer Facility Status (Transporter status must be indicated above)
- 3. Treater, Storer, or Disposer of HW (at your site)**  
Note: A hazardous waste permit is required for this activity.
  - Permitted  Interim Status  Proposed
- 4. Recycler of Hazardous Waste (at your site)**  
Note: A hazardous waste permit may be required for this activity.
- 5. Exempt Boiler and/or Industrial Furnace**
  - a. Small Quantity On-site Burner Exemption
  - b. Smelting, Melting, Refining Furnace Exemption
- 6. Underground Injection Control**

**B. Universal Waste Activities (Indicate Activity Type)**

- 1. Large Quantity Handler of Universal Waste [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):**

	<u>Generated</u>	<u>Accumulated</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Antifreeze	<input type="checkbox"/>	<input type="checkbox"/>

- 2. Destination Facility for Universal Waste**  
Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities (Indicate Activity Type)**

- 1. Used Oil Transporter**
  - a. Transporter
  - b. Transfer Facility
- 2. Used Oil Processor and/or Re-refiner**
  - a. Processor
  - b. Re-refiner
- 3. Off-Specification Used Oil Burner**
- 4. Used Oil Fuel Marketer**
  - a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
  - b. Marketer Who First Claims the Used Oil Meets the Specifications
- 5. Used Oil Fuel Burner (Indicate Combustion Device(s))**
  - Utility Boiler  Industrial Boiler  Industrial Furnace

**11. Description of Hazardous Wastes**

**A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

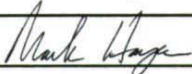
D009	U151					

EPA ID No.															
------------	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

**B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.


**12. Comments**


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

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
	Mark Hayes, FOSC	08-12-2011

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
INCIDENT REPORT

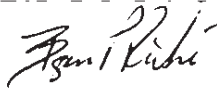
Incident ID: 132979

**Incident Description**

**Incident Type:** Release/Spill, Miscellaneous  
**Incident Date:** 8/8/2011 15:55:00  
**Parish:** East Baton Rouge  
**Municipality:** Baton Rouge  
**Location:** 800 E. McKinley  
**Lat/Lon:**  
**Basin/Segment:**  
**Substance(s):** Mercury  
**Media Impacted:** Soil  
**Incident Desc:** s11-2549 reporting a spill of mercury from a broken thermometer CML

**Incident Status**

**Lead Investigator:** Chris Rajewski  
**Incident Region:** Capital  
**Incident Status:** Pending Review  
**Followup Status:** Closed  
**As Of:** 8/16/2011 00:00:00

**Incident Reporter 1**

**Received By:** Spo Contact  
**Received Date:** 8/8/2011 15:55:00  
**Dispatch #:** s11-2549  
**Reported By:** Corey Malveaux  
**Phone:** 225-229-0291 cell (Work phone number)  
**Reporter Title:**  
**Organization:** EBR School System  
**Address:**  
  
**Municipality:**  
**State:** LA  
**Zip Code:**  
**Comments:**

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
INCIDENT REPORT

Incident ID: 132979

**Incident Source 1****Source Name:** McKinley Senior High School  
**Address:** 800 E McKinley St**Municipality:** Baton Rouge  
**State:** LA  
**Phone:****Parish:** East Baton Rouge  
**AI #:** 51443  
**Related Permits:****Comments:** McKinley Senior High School  
August 8, 2011  
Tempo#132979

On August 8, 2011 at approximately 1600 hours Louisiana Department of Environmental Quality Emergency Responder (LDEQ-ER) Chris Rajewski, Peter Michgelsen, and Peter Ricca responded to McKinley Senior High School concerning a mercury (CAS# 07439-97-6) spill. According to Coey Malveaux, East Baton Rouge School District Environmental Specialist, on August 6, 2011 approximately 2 fluid ounces of mercury from a manometer were reportedly spilled on the carpet within a room in the administration building of the school. The representative of the school attempted to remove the spilled mercury through gross recovery with a vacuum cleaner. School representatives then reportedly disposed of a manometer along with traces of elemental Mercury into a trash container immediately outside of the school. At approximately 1850 hours Eric Delgado, EPA Region 6, arrives to test the mercury vapors by using a Lumex Mercury Analyzer. Mr. Delgado tested the vapor levels in the office outside of the contaminated room. The mercury vapor levels were between 10,000-15,000 ng/m<sup>3</sup> in the breathing zone. EPA contractor clean up service Weston Solutions arrived on scene at 2000 hours but was denied initial access to the building by Larry Munson, East Baton Rouge School Director, until he arrived on scene to discuss incident further. At approximately 2145 hours Mr. Munson granted access to the contaminated area and Weston Solutions commenced the initial entry. No fires, injuries or road closures were reported as a result of this incident. No further action by LDEQ Emergency Response at this time. CMR

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
INCIDENT REPORT  
Incident ID: 132979

**Incident Source 2****Source Name:****Address:****Municipality:****State:****Phone:****Parish:****AI #:****Related Permits:****Comments:**

Update: On August 10, 2011 site activities included the following:

¿At 1300 hours, ERRS applied Chem 100 - Low Odor Mastic removal to floors in the spill affected areas.

¿At 1400 hours, START conducted air monitoring in the spill room, office adjacent to the spill room, and reception area. The breathing zone and floors of the reception area indicated mercury concentrations of 1,500 ng/m<sup>3</sup>, the spill room had mercury concentration of 2,000 ng/m<sup>3</sup> in the breathing zone and 3,000 ng/m<sup>3</sup> at the floor, and the office adjacent to the spill room had mercury concentrations of 3,000 ng/m<sup>3</sup> in the breathing zone and 12,000 ng/m<sup>3</sup> at the floor.

¿At 1740 START conducted air monitoring of the HVAC and vent area, readings were approximately 400 ng/m<sup>3</sup>. ERRS also vented the spill room and the adjacent office.

¿At 1800 hours air monitoring of the office adjacent to the spill room indicated mercury concentrations of 1,500 ng/m<sup>3</sup> in the breathing zone and 4,000 ng/m<sup>3</sup> at the floor level.

¿ERRS conducted heating of the spill room and adjacent office from approximately 1900 hours on August 10, 2011 until 0500 hours on August 11, 2011.

¿ERRS ended the heating cycle and began venting at approximately 0500 hours until approximately 0730 hours on August 11, 2011.

Update: On August 12, 2011 the following site activities occurred:

¿Additional venting of the administration office, spill room, and office adjacent to the spill room was conducted.

¿Air monitoring of the breathing zones in each of the rooms were all below 3,000 ng/m<sup>3</sup>.

¿Air monitoring at the floor near the bookcases on the east wall of the office adjacent to the spill room yielded results up to 7,000 ng/m<sup>3</sup>.

ERRS removed the remaining items and carpet, with an exception for the large desk, from the room adjacent to the spill room. All furniture and items were screened for mercury concentrations; none exceeded 3,000 ng/m<sup>3</sup>. The carpet was isolated and air monitoring yielded concentrations up to



**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
FIELD INTERVIEW FORM**

AGENCY INTEREST#: 51443      INSPECTION DATE: 8/8/2011      TIME OF ARRIVAL: 5:46pm  
 ALTERNATE ID#: \_\_\_\_\_      DEPARTURE DATE: 8/8/2011      TIME OF DEPARTURE: 11:00pm  
(ID Type/Number)

FACILITY NAME: McKinley Senior High School      PHONE #: (225) 344-7696

LOCATION: Administrative Office      PARISH: East Baton Rouge

RECEIVING STREAM (BASIN/SUBSEGMENT): \_\_\_\_\_  
 MAILING ADDRESS: 800 East McKinley Street      Baton Rouge      LA      70802  
(Street/P.O. Box)      (City)      (State)      (Zip)

FACILITY REPRESENTATIVE: Coey Malveaux      TITLE: School District Env. Specialist  
 FACILITY REPRESENTATIVE PHONE NUMBER: 225-229-0291

NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above): \_\_\_\_\_

INSPECTION TYPE: Tempo# 132474      PROGRAM INVOLVED: AIR  WASTE  WATER  OTHER: Emergency Response

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

On August 8, 2011 at approximately 1600 hours Louisiana Department of Environmental Quality Emergency Responder (LDEQ-ER) Chris Rajewski, Peter Michgelsen, and Peter Ricca responded to McKinley Senior High School concerning a mercury (CAS# 07439-97-6) spill. According to Coey Malveaux, East Baton Rouge School District Environmental Specialist, on August 6, 2011 approximately 2 fluid ounces of mercury from a manometer were reportedly spilled on the carpet within a room in the administration building of the school. The representative of the school attempted to remove the spilled mercury through gross recovery with a vacuum cleaner. School representatives then reportedly disposed of a manometer along with traces of elemental Mercury into a trash container immediately outside of the school. At approximately 1850 hours Eric Delgado, EPA Region 6, arrives to test the mercury vapors by using a Lumex Mercury Analyzer. Mr. Delgado tested the vapor levels in the office outside of the contaminated room. The mercury vapor levels were between 10,000-15,000 ng/m<sup>3</sup> in the breathing zone. EPA contractor clean up service Weston Solutions arrived on scene at 2000 hours but was denied initial access to the building by Larry Munson, East Baton Rouge School Director, until he arrived on scene to discuss incident further. At approximately 2145 hours Mr. Munson granted access to the contaminated area and Weston Solutions commenced the initial entry. No fires, injuries or road closures were reported as a result of this incident. No further action by LDEQ Emergency Response at this time. CMR

AREAS OF CONCERN:		
REGULATION	EXPLANATION	CORRECTED?
_____	_____	YES <input type="checkbox"/> NO <input type="checkbox"/>
_____	_____	YES <input type="checkbox"/> NO <input type="checkbox"/>
_____	_____	YES <input type="checkbox"/> NO <input type="checkbox"/>

PHOTOS TAKEN: YES  NO       SAMPLES TAKEN: YES  NO  (Attach Chain-of-Custody)

RECEIVED BY SIGNATURE: *Amor H. De Bevoise*

PRINT NAME: Amor H. De Bevoise  
(NOTE: SIGNATURE DOES NOT INDICATE AGREEMENT WITH INSPECTOR'S NOTES)

INSPECTOR(S): Chris Rajewski *Chris Rajewski*      CROSS REFERENCE: \_\_\_\_\_  
 Peter Michgelsen *Peter Michgelsen*      ATTACHMENTS: \_\_\_\_\_

REVIEWER: Peter Ricca *Peter Ricca*      8/11/11

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

Facility Name: McKinley Senior High School  
City: Baton Rouge Parish: East Baton Rouge  
Date: 8/8/2011 Reason: Mercury Spill

AI: 51443  
Photographer: C. Rajewski  
Other ID #:



Photo #: 1 of 3 Time: 8/8/2011  
Description: START-3 conducting air monitoring



Photo #: 2 of 3 Time: 8/10/2011  
Description: view of main room of administration building after removal began

Facility Name: McKinley Senior High School  
City: Baton Rouge Parish: East Baton Rouge  
Date: 8/8/2011 Reason: Mercury Spill

AI: 51443  
Photographer: C. Rajewski  
Other ID #:



Photo #: 3 of 3 Time: 8/10/2011  
Description: view of elemental mercury collected by ERRS with mercury vacuum



# NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

255957

If waste is asbestos waste, complete Sections I, II, III and IV  
If waste is NOT asbestos waste, complete Sections I, II and III

11/17 PM 2:29

### I. GENERATOR (Generator completes Ia-r)

a. Generator's US EPA ID Number		b. Manifest Document Number		c. Page 1 of	
d. Generator's Name and Location: USEPA / MCKINLEY HIGH SCHOOL MERCURY SPILL 800 EAST MCKINLEY ROAD BATON ROUGE, LA 70802 214-665-2705			e. Generator's Mailing Address: USEPA ATTN: MARK HAYES 1445 ROSS AVE, SUITE 1200 68F-PR DALLAS, TX 75202 214-665-2705		
f. Phone:			g. Phone:		
If owner of the generating facility differs from the generator, provide:					
h. Owner's Name:			i. Owner's Phone No.:		

j. Waste Profile #	k. Exp. Date	l. Waste Shipping Name and Description	m. Containers		n. Total Quantity	o. Unit Wt/Vol
			No.	Type		
5096-11-12689	8/12/2012	LOW LEVEL MERCURY CONTAMINATED DEBRIS	01	T		Y

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if this waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions. I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR 268 and is no longer a hazardous waste as defined by 40 CFR 261.

p. Generator Authorized Agent Name (Print) Jon Rinehart	q. Signature Jon Rinehart	r. Date Aug 18 2011
--	------------------------------	------------------------

### II. TRANSPORTER (Generator completes IIa-b and Transporter completes IIc-e)

a. Transporter's Name and Address: 225-604-1707, WALKER, LA 70755 ANDREW HARRIS		
b. Phone:	T-002-3125	
c. Driver Name (Print) Clayton Harris	d. Signature	e. Date 8-23-11

### III. DESTINATION (Generator complete IIIa-c and Destination Site completes IIId-g)

a. Disposal Facility and Site Address: BFI COLONIAL LANDFILL 5328 HWY. 70 SORRENTO LA 70778 225-875-8021		c. US EPA Number TD-005-0512	d. Discrepancy Indication Space:
---	--	---------------------------------	----------------------------------

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

e. Name of Authorized Agent (Print)	f. Signature	g. Date
-------------------------------------	--------------	---------

### IV. ASBESTOS (Generator completes IVa-f and Operator complete IVg-i)

a. Operator's Name and Address:		c. Responsible Agency Name and Address:	
b. Phone:		d. Phone:	
e. Special Handling Instructions and Additional Information:			

f.  Friable  Non-Friable  Both % Friable % Non-Friable

OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

g. Operator's Name and Title (Print)	h. Signature	i. Date
--------------------------------------	--------------	---------

\*Operator refers to the company which owns, leases, operates, controls, or supervises the facility being demolished or renovated, or the demolition or renovation operation or both



Health	3
Fire	0
Reactivity	0
Personal Protection	

## Material Safety Data Sheet Mercury MSDS

### Section 1: Chemical Product and Company Identification

**Product Name:** Mercury

**Catalog Codes:** SLM3505, SLM1363

**CAS#:** 7439-97-6

**RTECS:** OV4550000

**TSCA:** TSCA 8(b) inventory: Mercury

**CI#:** Not applicable.

**Synonym:** Quick Silver; Colloidal Mercury; Metallic Mercury; Liquid Silver; Hydragyrum

**Chemical Name:** Mercury

**Chemical Formula:** Hg

**Contact Information:**

Sciencelab.com, Inc.

14025 Smith Rd.

Houston, Texas 77396

US Sales: **1-800-901-7247**

International Sales: **1-281-441-4400**

Order Online: [ScienceLab.com](http://ScienceLab.com)

**CHEMTREC (24HR Emergency Telephone), call:**  
1-800-424-9300

**International CHEMTREC, call:** 1-703-527-3887

**For non-emergency assistance, call:** 1-281-441-4400

### Section 2: Composition and Information on Ingredients

**Composition:**

Name	CAS #	% by Weight
Mercury	7439-97-6	100

**Toxicological Data on Ingredients:** Mercury LD50: Not available. LC50: Not available.

### Section 3: Hazards Identification

**Potential Acute Health Effects:**

Very hazardous in case of skin contact (irritant), of eye contact (irritant), of ingestion, of inhalation. Hazardous in case of skin contact (corrosive, permeator). Liquid or spray mist may produce tissue damage particularly on mucous membranes of eyes, mouth and respiratory tract. Skin contact may produce burns. Inhalation of the spray mist may produce severe irritation of respiratory tract, characterized by coughing, choking, or shortness of breath. Severe over-exposure can result in death. Inflammation of the eye is characterized by redness, watering, and itching. Skin inflammation is characterized by itching, scaling, reddening, or, occasionally, blistering.

**Potential Chronic Health Effects:**

Hazardous in case of skin contact (permeator). CARCINOGENIC EFFECTS: Classified A5 (Not suspected for human.) by ACGIH. 3 (Not classifiable for human.) by IARC. MUTAGENIC EFFECTS: Not available. TERATOGENIC EFFECTS: Not available. DEVELOPMENTAL TOXICITY: Not available. The substance may be toxic to blood, kidneys, liver, brain, peripheral nervous system, central nervous system (CNS). Repeated or prolonged exposure to the substance can produce target organs damage. Repeated or prolonged contact with spray mist may produce chronic eye irritation and severe skin irritation.

Repeated or prolonged exposure to spray mist may produce respiratory tract irritation leading to frequent attacks of bronchial infection. Repeated exposure to a highly toxic material may produce general deterioration of health by an accumulation in one or many human organs.

#### Section 4: First Aid Measures

**Eye Contact:**

Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Cold water may be used. WARM water MUST be used. Get medical attention immediately.

**Skin Contact:**

In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Cover the irritated skin with an emollient. Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention immediately.

**Serious Skin Contact:**

Wash with a disinfectant soap and cover the contaminated skin with an anti-bacterial cream. Seek immediate medical attention.

**Inhalation:**

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention immediately.

**Serious Inhalation:**

Evacuate the victim to a safe area as soon as possible. Loosen tight clothing such as a collar, tie, belt or waistband. If breathing is difficult, administer oxygen. If the victim is not breathing, perform mouth-to-mouth resuscitation. WARNING: It may be hazardous to the person providing aid to give mouth-to-mouth resuscitation when the inhaled material is toxic, infectious or corrosive. Seek immediate medical attention.

**Ingestion:**

Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. If large quantities of this material are swallowed, call a physician immediately. Loosen tight clothing such as a collar, tie, belt or waistband.

**Serious Ingestion:** Not available.

#### Section 5: Fire and Explosion Data

**Flammability of the Product:** Non-flammable.

**Auto-Ignition Temperature:** Not applicable.

**Flash Points:** Not applicable.

**Flammable Limits:** Not applicable.

**Products of Combustion:** Not available.

**Fire Hazards in Presence of Various Substances:** Not applicable.

**Explosion Hazards in Presence of Various Substances:**

Risks of explosion of the product in presence of mechanical impact: Not available. Risks of explosion of the product in presence of static discharge: Not available.

**Fire Fighting Media and Instructions:** Not applicable.

**Special Remarks on Fire Hazards:**

When thrown into mercury vapor, boron phosphodiiodide ignites at once. Flame forms with chlorine jet over mercury surface at 200 deg to 300 deg C. Mercury undergoes hazardous reactions in the presence of heat and sparks or ignition.

**Special Remarks on Explosion Hazards:**

A violent exothermic reaction or possible explosion occurs when mercury comes in contact with lithium and rubidium. CHLORINE DIOXIDE & LIQUID HG, WHEN MIXED, EXPLODE VIOLENTLY. Mercury and Ammonia can produce an

explosive compound. A mixture of the dry carbonyl and oxygen will explode on vigorous shaking with mercury. Methyl azide in the presence of mercury was shown to be potentially explosive.

## Section 6: Accidental Release Measures

**Small Spill:** Absorb with an inert material and put the spilled material in an appropriate waste disposal.

**Large Spill:**

Corrosive liquid. Poisonous liquid. Stop leak if without risk. Absorb with DRY earth, sand or other non-combustible material. Do not get water inside container. Do not touch spilled material. Use water spray curtain to divert vapor drift. Use water spray to reduce vapors. Prevent entry into sewers, basements or confined areas; dike if needed. Call for assistance on disposal. Be careful that the product is not present at a concentration level above TLV. Check TLV on the MSDS and with local authorities.

## Section 7: Handling and Storage

**Precautions:**

Keep locked up.. Keep container dry. Do not ingest. Do not breathe gas/fumes/ vapor/spray. Never add water to this product. In case of insufficient ventilation, wear suitable respiratory equipment. If ingested, seek medical advice immediately and show the container or the label. Avoid contact with skin and eyes. Keep away from incompatibles such as oxidizing agents, metals.

**Storage:** Keep container tightly closed. Keep container in a cool, well-ventilated area. Do not store above 25°C (77°F).

## Section 8: Exposure Controls/Personal Protection

**Engineering Controls:**

Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the work-station location.

**Personal Protection:**

Face shield. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Gloves. Boots.

**Personal Protection in Case of a Large Spill:**

Splash goggles. Full suit. Vapor respirator. Boots. Gloves. A self contained breathing apparatus should be used to avoid inhalation of the product. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

**Exposure Limits:**

TWA: 0.025 from ACGIH (TLV) [United States] SKIN TWA: 0.05 CEIL: 0.1 (mg/m3) from OSHA (PEL) [United States]  
Inhalation TWA: 0.025 (mg/m3) [United Kingdom (UK)] Consult local authorities for acceptable exposure limits.

## Section 9: Physical and Chemical Properties

**Physical state and appearance:** Liquid. (Heavy liquid)

**Odor:** Odorless.

**Taste:** Not available.

**Molecular Weight:** 200.59 g/mole

**Color:** Silver-white

**pH (1% soln/water):** Not available.

**Boiling Point:** 356.73°C (674.1°F)

**Melting Point:** -38.87°C (-38°F)

**Critical Temperature:** 1462°C (2663.6°F)

**Specific Gravity:** 13.55 (Water = 1)

**Vapor Pressure:** Not available.

**Vapor Density:** 6.93 (Air = 1)

**Volatility:** Not available.

**Odor Threshold:** Not available.

**Water/Oil Dist. Coeff.:** Not available.

**Ionicity (in Water):** Not available.

**Dispersion Properties:** Not available.

**Solubility:** Very slightly soluble in cold water.

### Section 10: Stability and Reactivity Data

**Stability:** The product is stable.

**Instability Temperature:** Not available.

**Conditions of Instability:** Incompatible materials

**Incompatibility with various substances:** Reactive with oxidizing agents, metals.

**Corrosivity:** Non-corrosive in presence of glass.

**Special Remarks on Reactivity:**

Ground mixtures of sodium carbide and mercury, aluminum, lead, or iron can react vigorously. A violent exothermic reaction or possible explosion occurs when mercury comes in contact with lithium and rubidium. Incompatible with boron diiodophosphide; ethylene oxide; metal oxides, metals(aluminum, potassium, lithium, sodium, rubidium); methyl azide; methylsilane, oxygen; oxidants(bromine, peroxyformic acid, chlorine dioxide, nitric acid, tetracarbonylnickel, nitromethane, silver perchlorate, chlorates, sulfuric acid, nitrates,); tetracarbonylnickel, oxygen, acetylinic compounds, ammonia, ethylene oxide, methylsilane, calcium,

**Special Remarks on Corrosivity:**

The high mobility and tendency to dispersion exhibited by mercury, and the ease with which it forms alloys (amalgam) with many laboratory and electrical contact metals, can cause severe corrosion problems in laboratories. Special precautions: Mercury can attack copper and copper alloy materials.

**Polymerization:** Will not occur.

### Section 11: Toxicological Information

**Routes of Entry:** Absorbed through skin. Dermal contact. Eye contact. Inhalation. Ingestion.

**Toxicity to Animals:**

LD50: Not available. LC50: Not available.

**Chronic Effects on Humans:**

**CARCINOGENIC EFFECTS:** Classified A5 (Not suspected for human.) by ACGIH. 3 (Not classifiable for human.) by IARC. May cause damage to the following organs: blood, kidneys, liver, brain, peripheral nervous system, central nervous system (CNS).

**Other Toxic Effects on Humans:**

Very hazardous in case of skin contact (irritant), of ingestion, of inhalation. Hazardous in case of skin contact (corrosive, permeator).

**Special Remarks on Toxicity to Animals:** Not available.

**Special Remarks on Chronic Effects on Humans:**



May affect genetic material. May cause cancer based on animal data. Passes through the placental barrier in animal. May cause adverse reproductive effects (paternal effects- spermatogenesis; effects on fertility - fetotoxicity, post-implantation mortality), and birth defects.

**Special Remarks on other Toxic Effects on Humans:**

## Section 12: Ecological Information

**Ecotoxicity:** Not available.

**BOD5 and COD:** Not available.

**Products of Biodegradation:**

Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.

**Toxicity of the Products of Biodegradation:** The products of degradation are less toxic than the product itself.

**Special Remarks on the Products of Biodegradation:** Not available.

## Section 13: Disposal Considerations

**Waste Disposal:**

Waste must be disposed of in accordance with federal, state and local environmental control regulations.

## Section 14: Transport Information

**DOT Classification:** Class 8: Corrosive material

**Identification:** : Mercury UNNA: 2809 PG: III

**Special Provisions for Transport:** Not available.

## Section 15: Other Regulatory Information

**Federal and State Regulations:**

California prop. 65: This product contains the following ingredients for which the State of California has found to cause cancer, birth defects or other reproductive harm, which would require a warning under the statute: Mercury California prop. 65: This product contains the following ingredients for which the State of California has found to cause birth defects which would require a warning under the statute: Mercury Connecticut hazardous material survey.: Mercury Illinois toxic substances disclosure to employee act: Mercury Illinois chemical safety act: Mercury New York acutely hazardous substances: Mercury Rhode Island RTK hazardous substances: Mercury Pennsylvania RTK: Mercury Minnesota: Mercury Massachusetts RTK: Mercury New Jersey: Mercury New Jersey spill list: Mercury Louisiana spill reporting: Mercury California Director's List of Hazardous Substances.: Mercury TSCA 8(b) inventory: Mercury SARA 313 toxic chemical notification and release reporting: Mercury CERCLA: Hazardous substances.: Mercury: 1 lbs. (0.4536 kg)

**Other Regulations:**

OSHA: Hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200). EINECS: This product is on the European Inventory of Existing Commercial Chemical Substances.

**Other Classifications:**

**WHMIS (Canada):**

CLASS D-1A: Material causing immediate and serious toxic effects (VERY TOXIC). CLASS D-2A: Material causing other toxic effects (VERY TOXIC). CLASS E: Corrosive liquid.

**DSCL (EEC):**

R23- Toxic by inhalation. R33- Danger of cumulative effects. R38- Irritating to skin. R41- Risk of serious damage to eyes. R50/53- Very toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment. S2- Keep out of the

reach of children. S7- Keep container tightly closed. S26- In case of contact with eyes, rinse immediately with plenty of water and seek medical advice. S39- Wear eye/face protection. S45- In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible). S46- If swallowed, seek medical advice immediately and show this container or label. S60- This material and its container must be disposed of as hazardous waste. S61- Avoid release to the environment. Refer to special instructions/Safety data sheets.

**HMIS (U.S.A.):**

**Health Hazard:** 3

**Fire Hazard:** 0

**Reactivity:** 0

**Personal Protection:**

**National Fire Protection Association (U.S.A.):**

**Health:** 3

**Flammability:** 0

**Reactivity:** 0

**Specific hazard:**

**Protective Equipment:**

Gloves. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Wear appropriate respirator when ventilation is inadequate. Face shield.

**Section 16: Other Information**

**References:** Not available.

**Other Special Considerations:** Not available.

**Created:** 10/10/2005 08:22 PM

**Last Updated:** 11/01/2010 12:00 PM

*The information above is believed to be accurate and represents the best information currently available to us. However, we make no warranty of merchantability or any other warranty, express or implied, with respect to such information, and we assume no liability resulting from its use. Users should make their own investigations to determine the suitability of the information for their particular purposes. In no event shall ScienceLab.com be liable for any claims, losses, or damages of any third party or for lost profits or any special, indirect, incidental, consequential or exemplary damages, howsoever arising, even if ScienceLab.com has been advised of the possibility of such damages.*

EBR PARISH SCHOOL SYSTEM  
FACILITIES MANAGEMENT DEPARTMENT  
2875 MICHELLI DRIVE  
BATON ROUGE, LA 70805

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Louisiana Dept of Environ Quality	Coey Malveaux
COMPANY:	DATE:
Louisiana Dept of Environ Quality P.O. Box 4312 Baton Rouge, LA 70821-4312	8/12/2011
FAX NUMBER:	TOTAL NO. OF PAGES, INCLUDING COVER:
225-219-4044	
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
225-226-3671/225-226-3738	ATTN: OEC - ERSD - SPOC
RE:	YOUR REFERENCE NUMBER:

UNAUTHORIZED  
DISCHARGE NOTIFICATION  
REPORT

URGENT     FOR REVIEW     PLEASE COMMENT     PLEASE REPLY     PLEASE RECYCLE

NOTES/COMMENTS:

East Baton Rouge Parish School System  
7-Day Written Notification Report  
In accordance to LAC 33:I.3915, 3917 and 3719

Reported By: Coey L. Malveaux  
Environmental Specialist  
Facilities Management  
East Baton Rouge Parish Schools System  
2875 Michelli Drive  
Baton Rouge, LA 70805  
Office: 225-226-3671 or 225-226-3788

Location: McKinley High School  
A.I. Number: 51443  
800 E. McKinley Street  
Baton Rouge, Louisiana 70802

I, Coey Malveaux, was first notified of the incident around 3pm, Monday, August 8, 2011, by a Faculty member of McKinley High School. The faculty member stated that Mercury spilled onto the carpet in the office. LDEQ was contacted for guidance following the conversation with the Faculty member. Mr. Larry Munson, Director of Facilities for East Baton Rouge Parish School System (EBRPSS), to whom I report, and the State Police representative, Ms. Trameka, was contacted also. LDEQ emergency response representative, Peter J. G. Michgelsen and an associate arrived on site around 5pm. At that point, the EPA was contacted and a response person arrived around 7pm, Mr. Erick Delgado. An EPA emergency response contractor, Weston Solutions, arrived an hour or two later and began evaluating the office and a dumpster. The EPA response team has continued 24 hours a day from the time they arrived onsite. A representative onsite says they are aiming to be completed by Friday, August 12, 2011.

Through further conversation with the Faculty member, I was informed that he noticed silver metallic beads identified as Mercury on the carpet in a small office, that is located in the main office of McKinley High on Saturday, August 6, 2011. The individual contacted poison control and was instructed on how to handle the spill. The Faculty member, with the assistance of another coworker, followed the instructions of a poison control representative and collected the silver beads identified as Mercury into a plastic container, using a piece of cardboard or similar material like a broom and dust pan. The source of the mercury was a barometer which was being stored in the office by a previous employee. The amount was estimated to be between 2 and 3 fluid ounces. The materials were then placed in a dumpster that remained onsite until the day I was notified on Monday, August 8, 2011. The Faculty member contacted me on Monday the 8<sup>th</sup> when he noticed that mercury beads still remained on the carpet, which initiated the above action that was taken. The material was confirmed as Elemental Mercury (Hg).

The EPA is currently managing the remediation efforts and will properly dispose of all affected materials, as well as the Mercury itself. They have also been checking individuals involved for possible exposure. The discharge was limited to the main office and the dumpster. The dumpster is still onsite at this time. The incident took place prior to the school year beginning and use of the main office by staff and visitors was very limited. The discharge was preventable by proper education, handling, storage and or disposal of the source prior to the incident. No injuries resulted from the spill.

Procedures and measures to prevent future releases of this type will include the following:

- Produce and distribute a pamphlet or letter that will educate staff and contractors of the hazards of Mercury. The handout would also include educational information that would outline the proper way to store, and or dispose of Mercury and Mercury containing devices and instruments. The notification would also contain information for proper reporting and response to a spill.
- A means of cataloging and disposing of Mercury containing devices and instruments that are no longer in use will be put together. A means of replacing devices and instruments still in use with a suitable none Mercury containing equivalent will be drawn up if one does not already exist.



# State of Louisiana

## Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO  
GOVERNOR

MIKE D. McDANIEL, Ph.D.  
SECRETARY

DEC 15 2005

**CERTIFIED – RETURN RECEIPT REQUESTED (7004 1160 0001 9950 8595)**

Mr. Bryan Harmon  
Assistant Director/Chief Engineer  
City of Baton Rouge  
Department of Public Works  
P.O. Box 1471  
Baton Rouge, LA 70821

RE: Certificate of Completion/No Further Action  
**North Boulevard Improvements; Agency Interest (AI) Number 86103**  
North Blvd. at 10<sup>th</sup> Street to 19<sup>th</sup> Street, Baton Rouge, East Baton Rouge Parish

Dear Mr. Harmon:

The Louisiana Department of Environmental Quality (LDEQ), Remediation Services Division (RSD) has completed its review of the "Remedial Action Report" dated August 25, 2005, which was prepared on your behalf by Conestoga-Rovers and Associates. Thank you for providing this information. Based on our review of this document and all previously submitted information, we have determined that no further action is necessary at this time. The Basis of Decision for this notification is attached.

This report also documents that the corrective action performed under the LDEQ Voluntary Remediation Program (VRP) has resulted in a complete remediation of the site to established standards for industrial/commercial land use. All other requirements of the VRP in accordance with La. R.S., Title 30, Chapter 12, Part II have also been completed as documented by your previous submittals.

This letter serves as your Certificate of Completion and No Further Action for the North Boulevard Improvements Site. This Certificate of Completion is subject to the industrial/commercial land use restriction imposed as an institutional control, and documented by the environmental notification filed in the records. So long as industrial/commercial land use is maintained, this Certificate of Completion exempts the City of Baton Rouge from liability under LSA-R.S., Title 30, Chapter 12, Part I.

Mr. Bryan Harmon

**North Boulevard Improvements; Agency Interest (AI) Number 86103**

Page 2

No soils may be removed from this site without prior approval from LDEQ unless they are removed and disposed at a permitted disposal facility. Prior to the construction of enclosed structures over any portion of the impacted area, further evaluation and approval from LDEQ is warranted.

The LDEQ appreciates your effort in concluding this project, which is the second Complete Remediation performed under the VRP in the state of Louisiana. Please contact Mr. John Halk, Environmental Scientist Manager, at (225) 219-3217 for any questions regarding the site.

Sincerely,



Wilbert F. Jordan, Jr.

Assistant Secretary

Office of Environmental Assessment

WFJ:jhh

Attachment: Basis of Decision (BOD)

c: LDEQ Imaging Operations – IAS

Ms. Vicki Thibodeaux, LDEQ-RSD, HQ

Mr. Barry Hebert

Conestoga-Rovers and Associates, Inc.

4915 S. Sherwood Forest Blvd.

Baton Rouge, LA 70816

**BASIS OF DECISION (BOD) FOR CERTIFICATE OF COMPLETION &  
NO FURTHER ACTION**

**North Boulevard Improvements Site; Agency Interest (AI) Number 86103**

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has determined that the North Boulevard Improvements site requires No Further Action, and is granted a Certificate of Completion under the LDEQ Voluntary Remedial Program (VRP).

The North Boulevard Improvements site encompasses a section of North Boulevard from 10<sup>th</sup> to 19<sup>th</sup> Streets in Baton Rouge. An improvement project is underway to widen the roadway and construct an overpass over the railroad tracks that cross North Boulevard. The area of investigation consisted of commercial properties on the south side of North Boulevard from 10<sup>th</sup> to 15<sup>th</sup> Streets and on the north side of North Boulevard from 15<sup>th</sup> to 19<sup>th</sup> Streets.

Ten Areas of Investigation (AOIs) was closed in accordance with the 2000 LDEQ Risk Evaluation Corrective Action Program (RECAP) under the LDEQ VRP using Management Option-1 (MO-1) industrial/commercial standards. Initial interim corrective action involved removal of 22 underground storage tanks (USTs) and their contents, several hydraulic lifts and sumps used for car repair, and excavation of affected soils in and adjacent to the tank holds. These wastes were disposed of at a LDEQ permitted solid waste disposal facility as evidenced by manifests provided to the LDEQ-RSD. The removal of all source material insures that the residual concentrations of constituents of concern (COCs) will remain the same, or more likely, reduce over time due to natural processes. Following this interim corrective action, a RECAP Site Investigation was conducted under LDEQ oversight, after the site had been entered into the LDEQ VRP.

The RECAP Site Investigation documented that the groundwater beneath the AOI met the criteria for a Groundwater Classification 3 that does not discharge to surface water used as drinking water source (GW3NDW). The groundwater sample results documented that COCs did not exceed the site-specific GW3NDW RECAP MO-1 standards.

MO-1 RECAP soil industrial standards were applied to the site soil concentrations after the soil to groundwater pathway was eliminated from concern by using EPA SW-846 Method 1312, the Synthetic Precipitation Leaching Procedure (SPLP) for certain COCs. Temporary monitoring wells used to evaluate the groundwater were plugged and abandoned in accordance with applicable regulations when the site investigation was completed.



Based on the RECAP Site Investigation, it was determined that no further remedial action was needed for six of the ten identified AOIs, since these areas met the established RECAP standard. It was determined that further soil remediation was required at four AOIs (1350 North Blvd., 105 S. 14<sup>th</sup> St.; 1665 North Boulevard; and 1717 North Boulevard). This was due to levels of benzene, xylenes, lead, and Total Petroleum Hydrocarbons – Gasoline Range Organics (TPH-GRO), which exceeded established standards.

Prior to final approval of the Remedial Action Plan for the four AOIs needing further remedial action by the LDEQ-RSD, a thirty-day public notice period was conducted, and the adjacent landowners were notified of the proposed remedial action via certified letter as required by the VRP regulations. No comments were received from the public or adjacent landowners, therefore, the proposed corrective action received LDEQ approval without further modification.

Remedial action taken at the four AOIs included excavation and off-site disposal of the remaining contaminated soils at a LDEQ permitted solid waste disposal facility. A total of approximately 1,170 cubic yards of soil were excavated. Confirmation samples documented that the soil limiting RECAP standards had been achieved following these actions. No Further Action is granted when contamination either meets or is reduced to the extent necessary to achieve the established standards. When this action is conducted under the LDEQ VRP, a Certificate of Completion is also granted. The constituents of concern present that now meet the approved remediation standards for each AOI are noted in the following tables. The media impacted by these constituents is soil.

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
Area of Interest (AOI): 1124 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
Iron	14,800	56,000 (Soil)
Aluminum	10,800	190,000 (Soil)
Arsenic	9.73*	100 (Soil GW3ndw)

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 1244 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
Aluminum	12,800	190,000 (Soili)
Arsenic	7.3*	100 (Soil GW3ndw)
Iron	16,700	56,000 (Soili)

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 1350 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
Benzene	1.0	4.2 (Soil GW3ndw)
Ethylbenzene	35	230 (Soilsat)
TPH-GRO	1900	2,267 (Soili)
TPH-DRO	110	2,267 (Soili)
TPH-ORO	1700	2,000 (Soili)
Arsenic	6.46*	100 (Soil GW3ndw)

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 105 South 14<sup>th</sup> Street**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
Toluene	240	520 (Soil GW3ndw)
Ethylbenzene	75	230 (Soilsat)
Xylenes	< 0.04 (DL)	150 (Soilsat)
TPH-GRO	< 21 (DL)	2,267 (Soil GW3ndw)
TPH-DRO	110	1,667 (Soil GW3ndw)

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 1545 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
2-Methylnaphthalene	3.3	5.1 (Soili)
Arsenic	7.3*	100 (Soil GW3ndw)

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 1605 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
Benzene	1.7	3.2 (Soili)
TPH-DRO	1,400	2,500 (Soili)
TPH-ORO	2,500	5,000 (Soili)
Arsenic	4.0*	100 (Soil GW3ndw)

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 1665 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
Toluene	170	520 (Soilsat)
Ethylbenzene	93	230 (Soilsat)
Xylenes	<0.045 (DL)	150 (Soilsat)
TPH-GRO	<23 (DL)	1,250 (Soili)
TPH-DRO	110	1,250 (Soili)
TPH-ORO	890	2,000 (Soili)
Arsenic	6.84*	100 (Soil GW3ndw)

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 1717 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
Aluminum	12,600	38,000 (Soili)
Arsenic	9.15*	100 (Soil GW3ndw)
Iron	17,600	56,000 (Soili)

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 1801 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
TPH-GRO	1,400	1,667 (Soili)
Benzene	1.7	3.2 (Soili)
Aluminum	13,800	63,333 (Soili)
Arsenic	10.7*	100 (Soil GW3NDW)
Iron	16,500	56,000 (Soili)

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

**North Boulevard Improvements; Agency Interest (AI) Number 86103  
 Area of Interest (AOI): 1855 North Boulevard**

Constituent of Concern	Maximum Remaining Concentration (mg/kg)	Soil Limiting RECAP Standard (mg/kg)
TPH-DRO	280	650 (Soilni)
Arsenic	8.32*	100

\*Also meets the RECAP 2003 statewide background concentration of 12 mg/kg

Attachment – Page 6  
North Boulevard Improvements  
Agency Interest # 86013

Remediation to site-specific standards was conducted. In accordance with LAC 33:I.Chapter 13, if land use is going to be changed from industrial to non-industrial, the responsible party shall notify the LDEQ within thirty (30) days and the Area of Investigation shall be reevaluated to determine if conditions are appropriate for the proposed land use. Future use may dictate additional remedial activities. A conveyance notice has been filed with the East Baton Rouge City-Parish noting that the Area of Investigation was closed under industrial standards.

**Additional information on the details of the investigation and evaluation of this site may be obtained from LDEQ's Public Records Center located in the Galvez Building, Room 127, 602 N. Fifth Street, Baton Rouge, LA 70802. Additional information regarding the Public Records may be obtained by calling (225) 219-3168 or by emailing [publicrecords@la.gov](mailto:publicrecords@la.gov).**

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 Street Apt. No.  
 P.O. Box No. **Baton Rouge**  
 Dept. of Public Works  
 City, State, ZIP+4  
**P.O. Box 1471**  
**Baton Rouge, LA 70821**

PS Form 3800, June 2002

See Reverse for Instructions

NFA/B001  
COC

OFFICE OF ENVIRONMENTAL ASSESSMENT  
REMEDATION SERVICES DIVISION

PROJECT: North Blvd, ORIGINATOR: HALK  
AI#: 86103 OTHER #:

SECTION: CP3  
DATE: 12-2-5

	Req'd.	Signature	Date	Comments
Section Mgr./Supvr.	<input checked="" type="checkbox"/>	<u>HALK</u>	<u>12/2/5</u>	
Adm. Assistant	<input checked="" type="checkbox"/>	<u>Myra Deuro</u>	<u>12/6/05</u>	
Administrator	<input checked="" type="checkbox"/>	<u>Heidi Casanova</u>	<u>12/12/05</u>	
Legal	<input type="checkbox"/>			
Other ( )	<input type="checkbox"/>			
Assistant Secretary	<input checked="" type="checkbox"/>	<u>William J. ...</u>	<u>12/15/05</u>	
Deputy Secretary	<input type="checkbox"/>			
Secretary	<input type="checkbox"/>			
Additional Comments				



State of Louisiana  
Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO  
GOVERNOR

MIKE D. McDANIEL, Ph.D.  
SECRETARY

October 25, 2004

**CERTIFIED – RETURN RECEIPT REQUESTED (7003 2260 0000 5832 6055)**

Mr. Bryan Harmon  
Assistant Director/Chief Engineer  
City of Baton Rouge  
Department of Public Works  
P.O. Box 1471  
Baton Rouge, LA 70821

RE: Approval of Remedial Action Plan  
**North Boulevard Improvements; Agency Interest (AI) Number 86103**  
North Blvd. at 10<sup>th</sup> Street to 19<sup>th</sup> Street, Baton Rouge, East Baton Rouge Parish

Dear Mr. Harmon:

The Remediation Services Division, LDEQ, has completed review of the Remedial Action Plan dated August 2004. The public comment period is now considered closed. Based on our review and the fact that no public comments were received regarding the site, the above-referenced document is hereby approved for implementation.

Initiation of the corrective action process must begin within 60 days of receipt of Department approval and verified by submittal of the DEQ provided form (attachment), along with a cover letter. The completed form/cover letter must be received by the LDEQ





Mr. Bryan Harmon  
Page 2

Remediation Services Division at the enclosed address within 75 days of receipt of Department approval of the corrective action workplan.

Please contact me at 225-219-3217 with any questions.

Sincerely,



John Halk  
Environmental Scientist Manager  
Remediation Services Division

*attachment*

c: Terri Gibson  
LDEQ File Scanning Room 144-IAS

Barry Hebert  
CRA Services, Inc.  
4915 S. Sherwood Forest Blvd.  
Baton Rouge, LA 70816

# **CORRECTIVE ACTION IMPLEMENTATION FORM**

**Submit to RSD within 75 days of receipt of approval of Corrective Action Workplan**

<b>THIS PORTION TO BE COMPLETED BY TEAM LEADER</b>	
<b>Agency Interest Number</b>	<b>Agency Interest Name</b>
<b>Team Leader</b>	
<b>AOI Name/Unit Name/AOC Name</b>	
<b>Agency Interest Mailing Address</b>	

<b>THIS PORTION TO BE COMPLETED BY AGENCY INTEREST REPRESENTATIVE</b>	
Description of Activities (See examples below)	Date

<b>Agency Interest Representative Name and Title</b>
(printed)
(signature)

Mail to: Keith L. Casanova, Administrator  
 Remediation Services Division  
 P.O. Box 4314  
 Baton Rouge, LA 70821-4314

<b>Examples</b>
Approve design specifications
Authorize the development of design specifications
Award contract to contractor/consultant for implementation of corrective action
Begin equipment installation, i.e., waste water treatment system, air stripper unit, etc.
Begin interim measures corrective actions
Begin site preparation
Implement Interim Corrective Action Measures
Install groundwater recovery wells
Let out RFP
Order Corrective Action equipment
Submit application for LDEQ permit(s)
Submit formal application for LDEQ permit(s)

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Sent To  
**Mr. Bryan Harmon**  
**Assistant Director/Chief Engineer**  
**City of Baton Rouge**  
**Dept. of Public Works-P.O. Box 1471**  
**Baton Rouge, LA 70821**

PS Form 3800, June 2002

See Reverse for Instructions

5909 6295 0000 0922 6001  
7003 2260 0000 5823 6055



OFFICE OF ENVIRONMENTAL SERVICES  
REMEDIAL SERVICES DIVISION

Routing/Approval Slip



AI No.	9151	Facility:	Consolidated Force Main Alignment	Date Routed:	10/5/2011
Other ID No.		Location:	Narin Drive Section		
Activity No.		Originator:	Rashaunda J. Sparks		
Section/Group:	RG	Attachments:			
Description/Type of Document(s):	Conditional Approval/No Objection to Project Plans				

- Closure     Comfort Letter     Correspondence     Corrective Action     Conveyance Notice   
 NFA     NOD     Personnel     Other

Technical Review	Req'd.	Initials	Date	Return to Originator?	Comments
Environmental Scientist	<input checked="" type="checkbox"/>	PMJS	10/5/11	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
Geology	<input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Legal	<input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Technical Advisor	<input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Other ( _____ )	<input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	

Additional Comments

Management Review	Req'd.	Initials	Date	Return to Originator?	Comments
Supervisor	<input checked="" type="checkbox"/>	A	10/6/11	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
Manager	<input checked="" type="checkbox"/>	CET	10/6/11	<input type="checkbox"/> Y <input type="checkbox"/> N	
Administrator	<input checked="" type="checkbox"/>	(FP)	10/10/11	<input type="checkbox"/> Y <input type="checkbox"/> N	
Assistant Secretary	<input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Deputy Secretary	<input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Secretary	<input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	
Other ( _____ )	<input type="checkbox"/>			<input type="checkbox"/> Y <input type="checkbox"/> N	

Additional Comments

TEMPO Data Entry Completed (Date Document Completed): 9/20/2011

# State of Louisiana

OCT 11 2011

## DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE

September 20, 2011

David Einsel, P.E.  
Shread-Kuyrkendall & Associates, Inc.  
13000 Justice Avenue, Suite 16  
Baton Rouge, Louisiana 70816

RE: Conditional Approval/No Objection to Project Plans  
Consolidated Force Main Alignment; **AI Number 9151**  
Narin Drive Section  
Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Einsel:

We have completed our review of the Limited Subsurface Investigation dated March 4, 2011, on behalf of Shread-Kuyrkendall & Associates, Inc.

Based on a technical review of the above-referenced document, we hereby have no objection to the plans submitted for this project as long as the following stipulations are addressed:

- Fill material should be clean in areas of potential or suspected contamination, removed soils or wastes in these areas must be disposed of at permitted facilities (see below)
- A plan should be in place if potential hazardous materials are encountered. This plan should include testing, storage and disposal. Contractor should be aware of potentially hazardous conditions of such materials for worker safety compliance. It is understood that this plan will be submitted to the LDEQ for review and comment prior to its implementation.
- In the area of the Historic Valley Park Landfill:
  - Groundwater encountered should be treated as leachate, which should be properly disposed of at a permitted facility, or discharged under a Louisiana Pollution Discharge Elimination System (LPDES) Permit
  - Any waste or contaminated soils should be tested prior to disposal at a permitted facility. Per the Resource Conservation and Recovery Act (RCRA) once the material is removed from a pre-RCRA facility it becomes a waste and should be tested for RCRA Characteristics, and any other parameters specified by the disposal facilities permit or procedures

Please contact Rashaunda Sparks at 225-219-2967 or via email at [Rashaunda.Sparks@la.gov](mailto:Rashaunda.Sparks@la.gov) with any questions. All correspondence must include the AI numbers cited above and be submitted in triplicate to:

Mr. David Einsel, P.E.

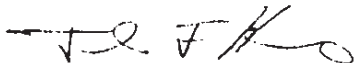
Page 2

September 20, 2011

Thomas F. Harris, Administrator  
Underground Storage Tank and Remediation Division  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. F. Harris', with a stylized flourish at the end.

Thomas F. Harris, Administrator  
Underground Storage Tank and Remediation Division

rmjs

c: Imaging Operations – IAS  
Mr. Richard M. Simon, Senior Principal/Regional Manager  
Terracon Consultants, Inc.  
2822-B O’Neal Lane  
Baton Rouge, LA 70816

## PRELIMINARY ASSESSMENT

DATE: August 31, 1989

PREPARED BY: Charles Hunter, Inactive and Abandoned Sites, LaDEQ,  
Baton Rouge, LA

Site: Valley Park Middle School  
4510 Bawell St.  
Baton Rouge, LA 70808

EPA ID#: None assigned.

TDD#: None assigned.

### 1. Site Information

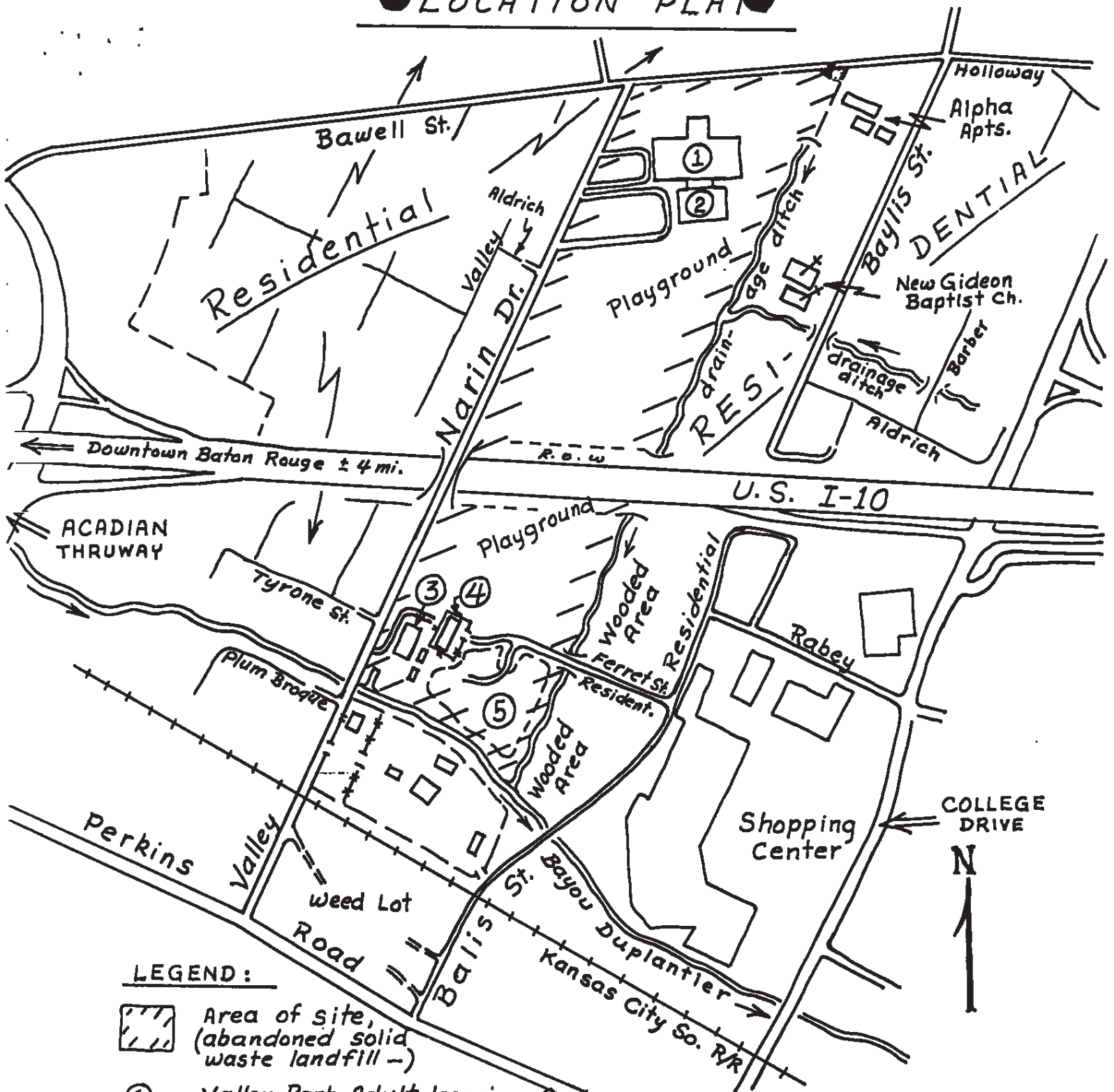
The Valley Park Middle School site, hereinafter referred to as "the site", occupies approximately 36 acres in Baton Rouge, Louisiana. The site is a rectangular shaped property bounded by Bawell St. to the North, Nairn St. to the West, Dawson Creek to the South, and an unnamed drainage ditch to the East (see figure 1). The geographic coordinates are 30° 26' 33" N latitude and 91° 08' 38" W longitude. The site overlies a former municipal landfill for the City of Baton Rouge, and is divided East to West by Federal Highway Interstate 10 (I-10). The Valley Park Middle School building is located on the site property north of I-10 that totals just over 23 acres, and the Valley Park Recreational Playground is located on the site property south of I-10 that totals approximately 13 acres. The East Baton Rouge School Board acquired the site property north of I-10 from the City of Baton Rouge in 1965. The East Baton Rouge Parish Recreation and Park Commission (BREC) and the Baton Rouge City-Parish separately own all the parcels of the site south of I-10 (1). Because there are buildings and play areas located over the landfill and because there are no records of what was disposed at the landfill during its operation, the purpose of this investigation is to compile records and evidence of the impact of landfill contaminants.

### 2. Background/Operating History

#### a. Site history.

Figure 1:

# LOCATION PLAT



**LEGEND:**



Area of site, (abandoned solid waste landfill -)

- ① Valley Park Adult Learning Center
- ② Valley Park Middle School
- ③ Narin Dr. Park (A BREC facility)
- ④ Dept. of Public Works, S. Maint. Lot
- ⑤ Dept. P.W., Stockpile excess dirt and broken concrete -

**Note:** Orig. Sz. of landfill = 40 ac. (Valley park area = 23 ac.; Narin Dr. Pk. = 13 ac.; I-10 area = 4 ac. -)

**LOCATION PLAT**

Valley Park Elementary Site  
 (City of Baton Rouge, La., E. Baton Rouge Pk.)  
 Data taken from an Aerial  
 Photo (La. DOTD 450-10-00,  
 749-29, taken 5-20-86) -  
 EBO/4-1-89 Scale: 1" = 505'



The Baton Rouge City-Parish began using the site, then called the Valley Park Landfill, as a backup to their primary landfill, the McKinley St. Landfill, in the 1940's, and continued to use it as a backup landfill until the McKinley St. Landfill was closed in 1957. The site served as the City-Parish's primary landfill from 1958 through 1962. Investigation of City-Parish records revealed no existing documentation of the types or quantities of materials disposed at the site during this period. Landfilling at the site was discontinued with the commencement of construction of the interstate at the site in 1963. The construction of I-10 across the property was completed in 1965. In August, 1965, the East Baton Rouge School Board acquired the site property north of I-10 in a land swap with the City-Parish (2). Construction of the Valley Park School building began in 1966. The building is situated directly over a portion of the landfill (3). The school system operated the building as a junior high school (approx. 800 children, grades 9 & 10) from 1968 through the 1978-79 school year, and as a middle school (approx. 600 children, grades 6, 7 & 8) from the 1979-80 school year through the 1985-86 school year (4). Since September, 1986, the EBR School System has housed special education support services personnel and an adult education program in the building. At the present time, approximately 150 staff and from 20 to 50 students occupy the building 40 hours per week and an estimated 150 adult education students occupy the building 15 hours per week (4,5). BREC built a recreational park, called Nairn Park, on the landfill south of I-10 in 1966, right after the EBR School Board began development of the site property north of I-10. Since then additional fill material has been added to the playing field on an as needed basis to maintain a solid flat playing surface. The Director of Nairn Park estimates that approximately 300 people use the playing field each week throughout the year for recreational purposes.

#### b. Discussion of known/potential problems

##### -Summary of existing analytical data

The Hazardous Waste Management Division, La. Department of Natural Resources (LaDNR), contracted for laboratory testing of one water and three sludge samples from the site in December, 1981. Tests for 14 heavy metals in the water sample, and 88 organic compounds in the sludge samples indicated "no environmental problems at this time" (6,7). In August, 1982, three Louisiana State University (LSU) faculty/researchers released a report of analysis of soil-sediment and surface water samples performed by a class of LSU

students during Spring, 1982. They reported that " (t)he soil-sediment samples contained elevated levels of zinc, cadmium, and lead", and that..."arsenic concentrations in the first two leachate streams (plumes into the drainage ditch along the eastern boundary of the site) were a factor of 10 higher than the upstream soils" (8). In December, 1982, as a followup to the LSU study, the Hazardous Waste Management Division, LaDNR, contracted for analysis of seven samples drawn from the site for the presence of 29 volatile and 57 semivolatile organic priority pollutants, 25 pesticides and polychlorinated biphenyls (PCBs), and 14 heavy metal priority pollutants (9,10). This analysis, summarized in Table 1, revealed the presence of two volatile organic priority pollutants, chloroform and methylene chloride, in two soil samples drawn from the school and recreational playgrounds; a combined total of 15 semivolatile organic priority pollutants and 11 heavy metal priority pollutants present in varying numbers and amounts in all seven samples; and no pesticides or PCBs in any of the samples. Analysis of these 1982 reports reflects there is the potential for direct contact with priority pollutants at the site, and therefore a strong possibility for concern at the present time.

**-Summary of off-site reconnaissance**

Aerial photos of the site include pictures taken in 1941, 1953, 1959, 1965, 1981 and 1986 (8,11).

**-Sources of available information**

Sources would include past employees of the City-Parish landfill system, BREC, and the SPCA.

**-Emergency or remedial actions**

In November, 1988, the Inactive and Abandoned Sites (IAS) Division, LaDEQ, responded to a citizen's complaint filed by an East Baton Rouge Parish School System employee housed in the Valley Park Middle School building at the site. The employee was situated in the pupil appraisal room that was previously the cafeteria when the building served as a school. She complained of a foul smell, "like rotten garbage, rotten eggs" emanating from the floor drains in the room. In March, 1989, the IAS Division investigated the school building for the presence of volatile organics, using an Organic Vapor Analyzer (OVA). No volatile organics were detected. However, the OVA unit used was not capable of detecting either hydrogen sulfide (H<sub>2</sub>S) or methane gases, two gases known to be generated in landfills; one, H<sub>2</sub>S, with the characteristic odor of rotten eggs. The school

system plugged the floor drains the following week and no further complaints have been received by the IAS Division (4,5).

### 3. Waste containment/Hazardous Substance Identification

#### a. Documentation available

Investigation by the IAS Division supports that the Baton Rouge City-Parish maintained no records of types or quantities of waste materials received by its landfills during the 40's, 50's, or 60's. Hence, no waste disposal records or manifests are believed to exist.

#### b. Potential/known waste type/estimated waste quantity/operation responsible

Known waste types identified in site soil and leachate samples include two volatile organic and 15 semivolatile organic priority pollutants, and 11 heavy metal priority pollutants (12,13). Assuming that the site includes 36 acres of fill material, and assuming a uniform soil profile of 6 to 8 feet of garbage mixed with fill soil, there are approximately 400 thousand cubic yards of garbage/fill mix at the site. Of this estimated total of garbage/fill mix, approximately 256 thousand cubic yards underly the Valley Park Middle School building and school grounds and 144 thousand cubic yards underly Nairn Park. The Baton Rouge City-Parish is the party responsible for the operation of Valley Park Landfill and, consequently, all materials disposed at the site.

#### c. Containment

There are no containment structures other than the two foot clay fill overlying the landfill.

### 4. Pathway Characteristics

#### a. Air pathway characteristics (gas mobility)

Landfill-produced H<sub>2</sub>S and methane gases are two potential air pathway contaminants of concern. No vapor sampling has been performed on site for the presence of H<sub>2</sub>S or methane, though there is reason to suspect their presence based upon the citizen's complaint(4,5).

#### b. Ground water characteristics

-Regional ground water setting

A typical soil profile for the Baton Rouge area includes a hard clay pleistocene layer which blankets the area beginning at a depth of approximately 15 feet and extending to a depth of a minimum of 60 feet below sea level. East Baton Rouge Parish overlies 12 fresh water aquifers aligned in layers of sand from 200 to 3100 feet below sea level. Except for the alluvial sand aquifer layers near the surface that lie near the Mississippi River and west of the River, these aquifers are recharged where they reach the earth's surface east of the Mississippi River and northward as far as into the state of Mississippi. The blanket layer of hard pleistocene clay serves as a natural barrier restricting migration of contaminants into the aquifers from above (14).

**-Site specific conditions**

There are 90 registered water wells within a four mile radius of the site that are either operational or on standby, 41 of which are public supply wells (see attached water well location map (15) and well listing (16)). Of the 17 wells within a two mile radius of the site, five are public supply wells. Other wells may exist in this area that have not been registered with the Louisiana Department of Transportation (LaDOTD) Office of Public Works.

**-Net precipitation estimate**

Based upon thirty years of data (1951-1980) from the National Weather Service, mean annual rainfall is 55.8 inches in the Baton Rouge area. Water budget analysis performed by the Louisiana Office of State Climatology indicates that the average environmental moisture utilization (evapotranspiration) for the same 30 years is approximately 36.3 inches. The difference between these two values, surplus available for runoff, equals 19.5 inches per year (17). During June, 1989, a total of 23 inches of rainfall was recorded in the Baton Rouge area, and it rained on 15 of the first 17 days in July, 1989.

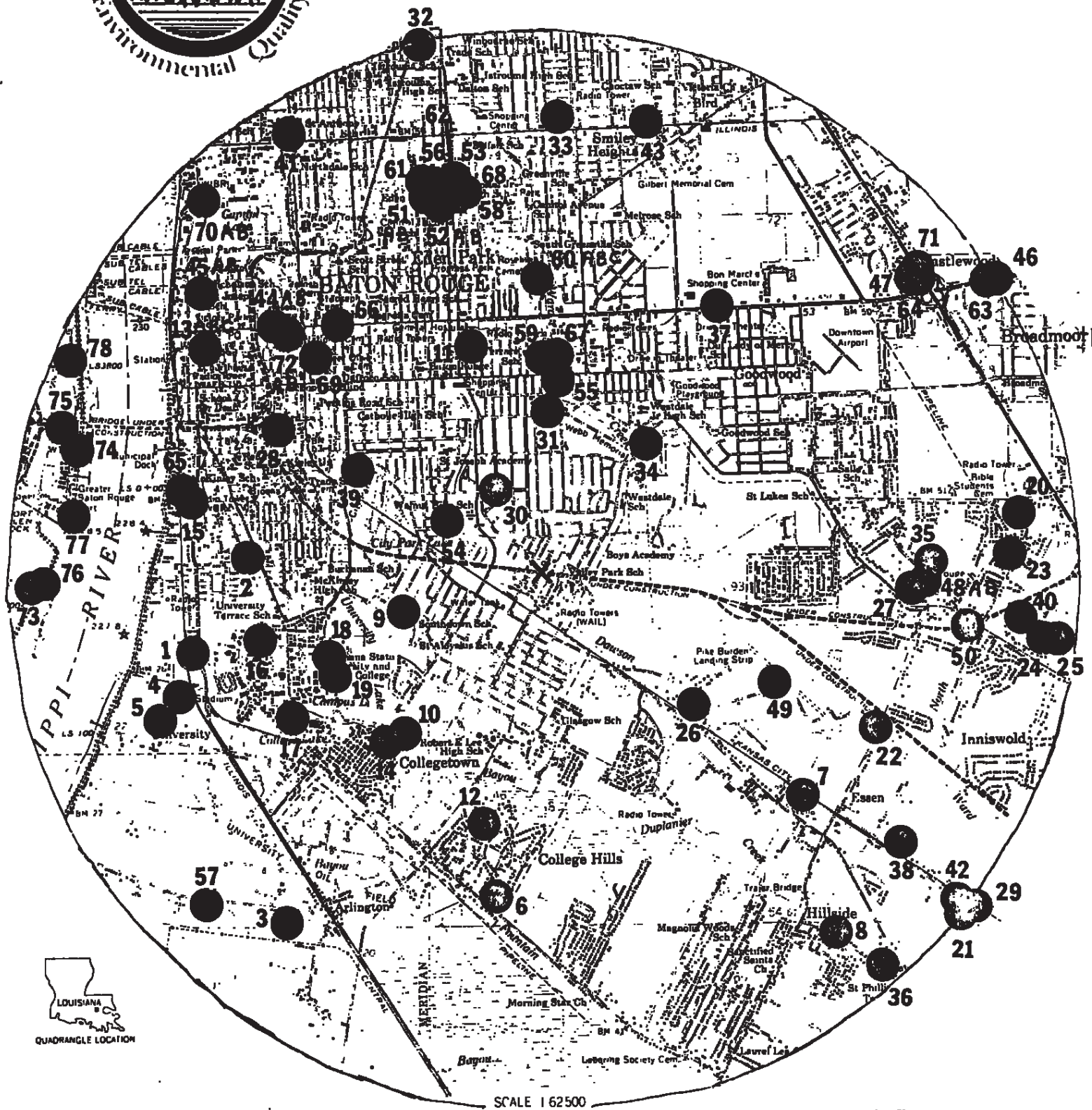
**c. Surface water characteristics**

**-Regional surface water setting**

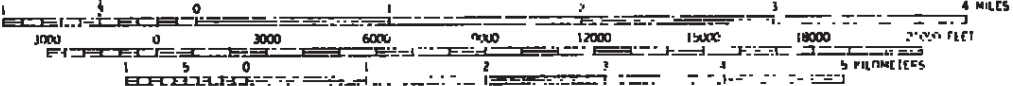
An open drainage ditch bounds the site to the North and East and carries surface water from the site southwestward, joining Dawson's Creek which bounds the site to the South. Dawson's Creek then flows southeastward joining Ward's Creek 6.3 miles downstream from the site. Approximately 7.5 miles downstream from the site, Ward's Creek divides forming a 1.5 mile long diversion canal which then rejoins Ward's Creek. At a point 12.3 miles downstream from the site, Ward's Creek joins Bayou Manchac which



# VALLEY PARK MIDDLE SCHOOL SITE WATER WELL LOCATIONS



SCALE 1:62500



CONTOUR INTERVAL 5 FEET  
NATIONAL GEODETIC VERTICAL DATUM OF 1929

flows easterly. The 15 mile target distance is reached 2.7 miles downstream along Bayou Manchac where the Bayou intersects Welsh Gully. Bayou Manchac joins the Amite River which flows southeasterly into Lake Maurepas which connects with Lake Pontchartrain and eventually the Gulf of Mexico.

**-Recreational use**

Bayou Manchac is used heavily for recreational purposes. Its banks are lined with camps, some occupied year-round and some occupied seasonally for fishing and/or hunting. A small wetlands area exists along Ward's Creek within the target distance downstream from the site. A diversion canal has been constructed along this section of Ward's Creek to assist stream flow during high water conditions. Bayou Manchac drains a watershed, Alligator Swamp, that is used for marshland hunting and fishing.

**5. Targets**

There are 90 known ground water wells within 4 miles of the site, 41 of which are used for public water supplies (15,16), and there are five public supply wells within two miles of the site. There are no drinking water intakes along the 15 mile surface water migration path from the site. Surface water along the 15 mile migration pathway is used for recreational fishing only. The population within 4 miles of the site is 121,994 (18). Single family residences abutt the site to the North, West, and East.

**6. Other Regulatory Involvement**

None

**7. Conclusions and Recommendations**

The Valley Park Middle School Site is a 36 acre former municipal landfill for the City-Parish of Baton Rouge. A total of 27 priority pollutants in the form of volitile organics (chloroform and methylene chloride), semivolitile organics (phthalates, pyrenes, fluoranthenes, and others), and heavy metals (arsenic, mercury, chromium, lead, and others) have been detected at locations on site that are in direct contact with school students, personnel, and the general public. Sample analysis has revealed the presence of no pesticides or PCBs on site. The major concern is the proximity of the school building and the recreation center/playground to the covered

landfill. An estimated 300 people use the BREC ball diamond each week and another 300+ personnel/students use the school building as a job site or attend classes on a regular basis. Another concern is the potential for contamination of surface water from migration of pollutants from the landfill. Site surface water drainage is not controlled. Analysis of sludge samples drawn from the open drainage ditch in 1982 suggested that surface water migration of priority pollutants had not advanced to Dawson's Creek. The present surface water migration status of priority pollutants is unknown.

The IAS Division, LaDEQ, concludes that further information is necessary to characterize the site.

## REFERENCES

<u>Reference Number</u>	<u>Reference</u>
1	Plat of Nairn Drive Park, Site Property South of I-10. January 28, 1980.
2	Legal Document, Title Transfer of Property Between BR City-Parish and the EBR School Board. August 23, 1965.
3	Letter from Louis Capizzoli Jr., CEC, to EBR School Board Regarding Building Construction Recommendations. May 12, 1966.
4	LaDEQ, IAS Division, Citizen's Complaint Record. November, 1988.
5	Memorandum from Tom Mayhall, LaDEQ, to File Regarding Valley Park Middle School. March 30, 1989.
6	LaDNR, Interim Inspection Report Providing Results of Lab Tests Performed by Enviro-Med. December 9 1982.
7	Enviro-Med Laboratories, Report of Findings from Analysis of 3 Samples Drawn from the Site. November 30, 1981.
8	Hill, John M., Malone, Roland F., Burden, David S., "A Preliminary Environmental Assessment, East Valley Park Middleschool Landfill Site", Submitted to LaDNR. October, 1982.
9	Hazardous Waste Management Division, LaDEQ, General Inspection Report Listing Field Sample Locations/Statistics. December 1, 1982.
10	Gulf South Research Institute (GSRI), "Preliminary Data Summary- Priority



## REFERENCES

- | <u>Reference Number</u> | <u>Reference</u>   |
|-------------------------|--|
| 10,cont'd.              | Pollutant and Miscellaneous Analytical Determinations", Prepared for Hazardous Waste Management Division, LaDNR. December 13, 1982.  |
| 11                      | Aerial Photo of the Valley Park Middle School Site. May 20, 1986.  |
| 12                      | (GSRI), "Final Data Summary- Priority Pollutant and Miscellaneous Analytical Determinations", Prepared for Hazardous Waste Management Division, LaDNR. December 21, 1982.          |
| 13                      | LaDEQ, IAS Division, Summary Table of GSRI Sample Analysis Results Contained in December 21, 1982 Final Report. August 4, 1989.  |
| 14                      | La Dept. of Conservation, La. Geol. Survey, and La. Dept. of Public Works, Water Resources Bulletin #2, "Ground Water Conditions in the Baton Rouge Area 1954-59". December, 1961. |
| 15                      | LaDEQ, IAS Division, Valley Park Middle School Site Water Well Location Map, July 25, 1989.  |
| 16                      | DOTD Water Resources Division, Listing of Water Wells Within 4 Mile Coordinates of Valley Park Site. July 18, 1989.  |
| 17                      | Letter from LSU Assistant Climatologist to Charles Hunter, LaDEQ, Regarding Baton Rouge Precipitation. June 26, 1989.  |
| 18                      | POPULATION ESTIMATE WITHIN 4 MILES RADIUS OF SITE BASED UPON ESTIMATED 1980 CENSUS TRACT POPULATIONS, AUGUST 31, 1989.   |

# SCREENING SITE INSPECTION REPORT

JUL - 1 1992

VALLEY PARK SCHOOL  
4510 BAWELL STREET  
BATON ROUGE, LOUISIANA 70808  
(LAD985170273)

VOLUME 1 OF 3

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The Louisiana Department of Environmental Quality  
Inactive and Abandoned Sites Division

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VALLEY PARK SCHOOL  
BATON ROUGE, LOUISIANA

1. INTRODUCTION

The U.S. Environmental Protection Agency (EPA) has tasked the Louisiana Department of Environmental Quality (LDEQ), Inactive and Abandoned Sites Division (LDEQ) to develop a report for the screening site investigation (SSI) of the Valley Park School in Baton Rouge, Louisiana in East Baton Rouge Parish. The EPA Site Identification number for this site is LAD985170273. This investigation is performed under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA). The project is funded by the EPA/LDEQ Multi-site Grant.

1.1 Screening Site Investigation Objectives

The SSI evaluates the potential risks associated with hazardous waste generation, storage and disposal at the site. It expands upon data collected during the Preliminary Assessment (PA) and identifies data gaps. Information obtained during the SSI supports the management decision of whether the site qualifies for the Listing Site Inspection (LSI) or receives the classification of "Site Evaluation Accomplished (SEA)" under the Superfund Amendments and Reauthorization Act (SARA).

1.2 Site Description

The Valley Park School site, also called the Valley Park Landfill, hereinafter referred to as "the site," comprises approximately thirty-six (36) acres within the city limits of Baton Rouge, Louisiana in East Baton Rouge Parish. The geographic coordinates are: 30° 26' 33" N. latitude and 91° 08' 38" W. longitude. It is divided in half from east to west of the site by U.S. Interstate Highway 10.

The northern twenty-three acre section of the site is owned by the East Baton Rouge (EBRP) School Board and includes the Valley Park Administration Complex building, parking lots, basketball courts and two baseball fields. Approximately 300 personnel occupy the building on a full or part time basis. Also, adult and child students participate in learning and testing activities.

The East Baton Rouge Parish Recreation and Parks Commission and the Baton Rouge City-Parish separately own two parcels of land located in the southern portion of the site, totaling 13 acres. This area includes an indoor recreational center, three adjacent buildings, a baseball field, an adolescent playground area, and a large

stockpile of dirt and rubble. Approximately 1500 people use the recreation center and approximately 300 people use the outdoor facilities on a monthly basis. The three buildings are occupied by twenty-seven City/Parish staff members (Ref. 1, 2 & 3).

### 1.3 Site Conditions

There is an estimated six- to eight- foot deep lift of garbage/fill material in the landfill. There is a two foot clay cap on the landfill in good condition. There are no containment structures at the site except a two foot clay cap. Garbage debris is apparent along the full length of the ditch bordering the east side of the site. The cap is in good condition with a healthy grass covering. Stressed vegetation was not detected. Leachate in four places along the east side of the site flows into the adjacent ditch. All building structures on the site appear in good condition. The parking lot at the Administration Building is in poor condition due to subsidence. Subsidence is the result of settling that occurs as loosely-packed wastes compress and decompose over time. The administration building has not and probably will not suffer from subsistence because the building foundation slab is anchored and supported by a hard Pleistocene clay (Ref 4).

### 1.4 Operating History

The Valley Park Landfill began using the site in the 1940's, first as a backup, then as the City-Parish's primary landfill from 1958 to 1963. No known records were maintained as to types or quantities of materials deposited at the site. It is assumed that the site contains primarily residential garbage from the Baton Rouge Community. There is no evidence that potentially hazardous wastes were or were not deposited at the site. Construction of the Interstate (I-10) dividing the site commenced in 1963 and was completed in 1965.

The East Baton Rouge Parish School Board initiated construction of the Valley Park School building in 1966 and it was completed in 1968. The building is supported by wooden pilings at a depth of fifteen feet into pleistocene clay. Valley Park operated as a junior high school from 1968 to 1973, then as a middle school until 1986, at which time it converted to an administrative, testing, and adult education center.

Residential construction occurred around the site primarily between 1941 and 1953, with an increase in density of housing from 1953 until 1959. Most buildings around the site are single or multiple family homes. There are also some apartment complexes, churches, and small businesses nearby.

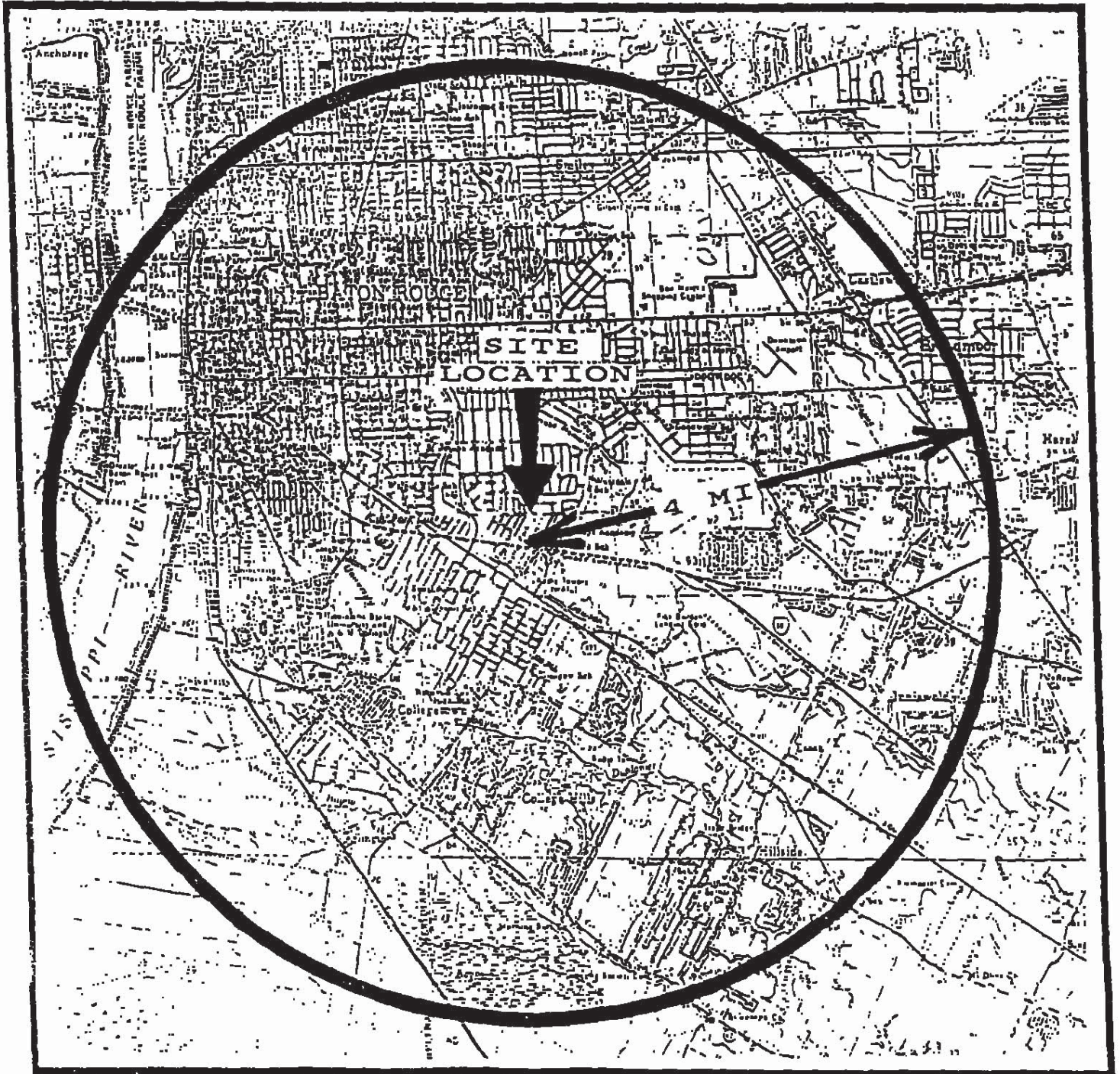
1.5 Site Location Map



SITE LOCATION MAP  
VALLEY PARK LANDFILL  
BATON ROUGE, LA



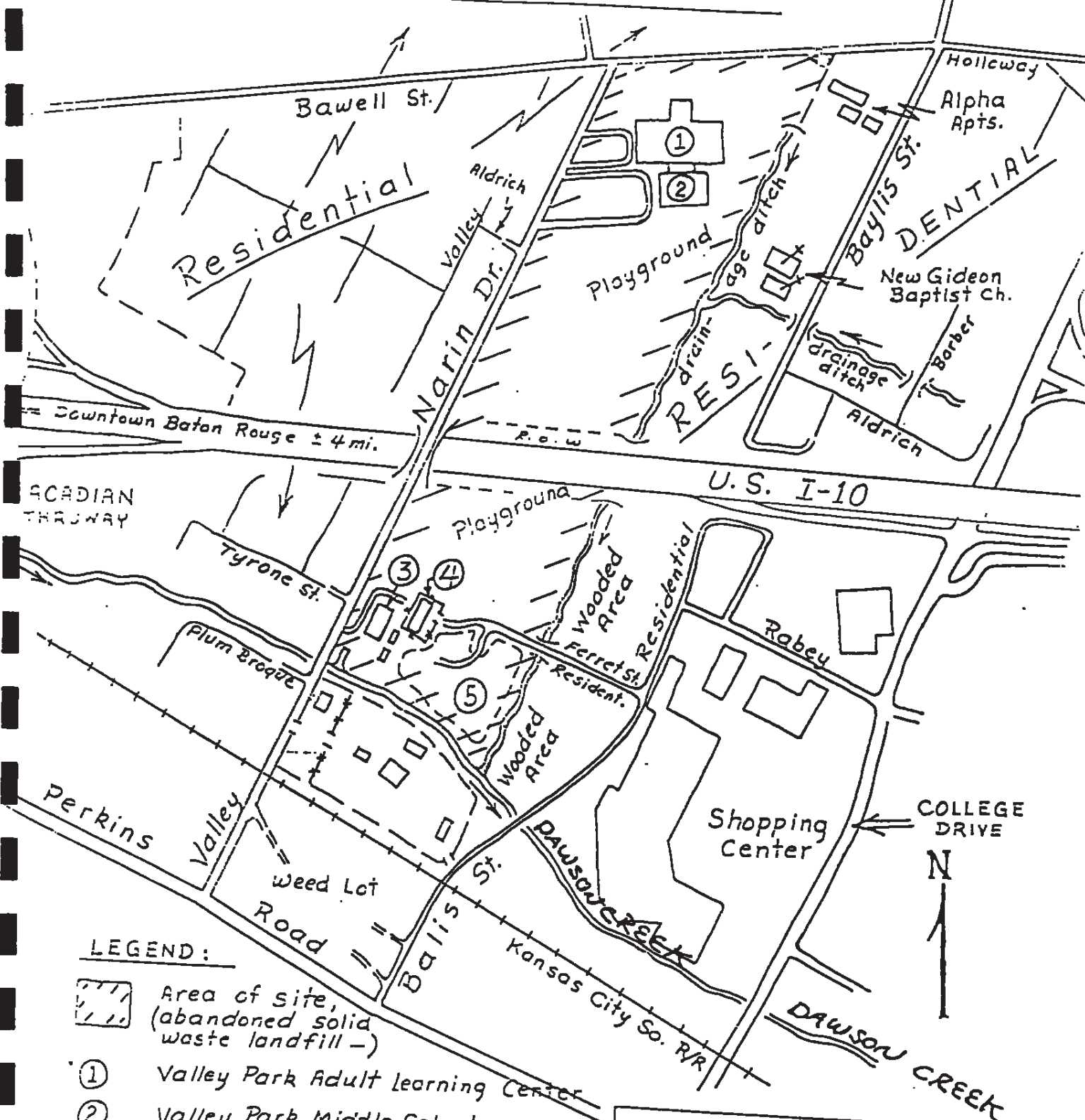
QUADRANGLE LOCATION  
NEW ORLEANS EAST, LA  
NEW ORLEANS WEST, LA






1.6 Location Plat and Aerial Photo

# LOCATION PLAT



**LEGEND:**

-  Area of site, (abandoned solid waste landfill -)
- ① Valley Park Adult learning Center
- ② Valley Park Middle School
- ③ Narin Dr. Park (A BREC facility)
- ④ Dept. of Public Works, S. Maint. Lot
- ⑤ Dept. P.W., Stockpile excess dirt and broken concrete -

*Note:* Orig. Sz. of landfill = 40 ac. (Valley park area = 23 ac; Narin Dr. Pk. = 13 ac.; I-10 area = 4 ac. -)

**LOCATION PLAT**

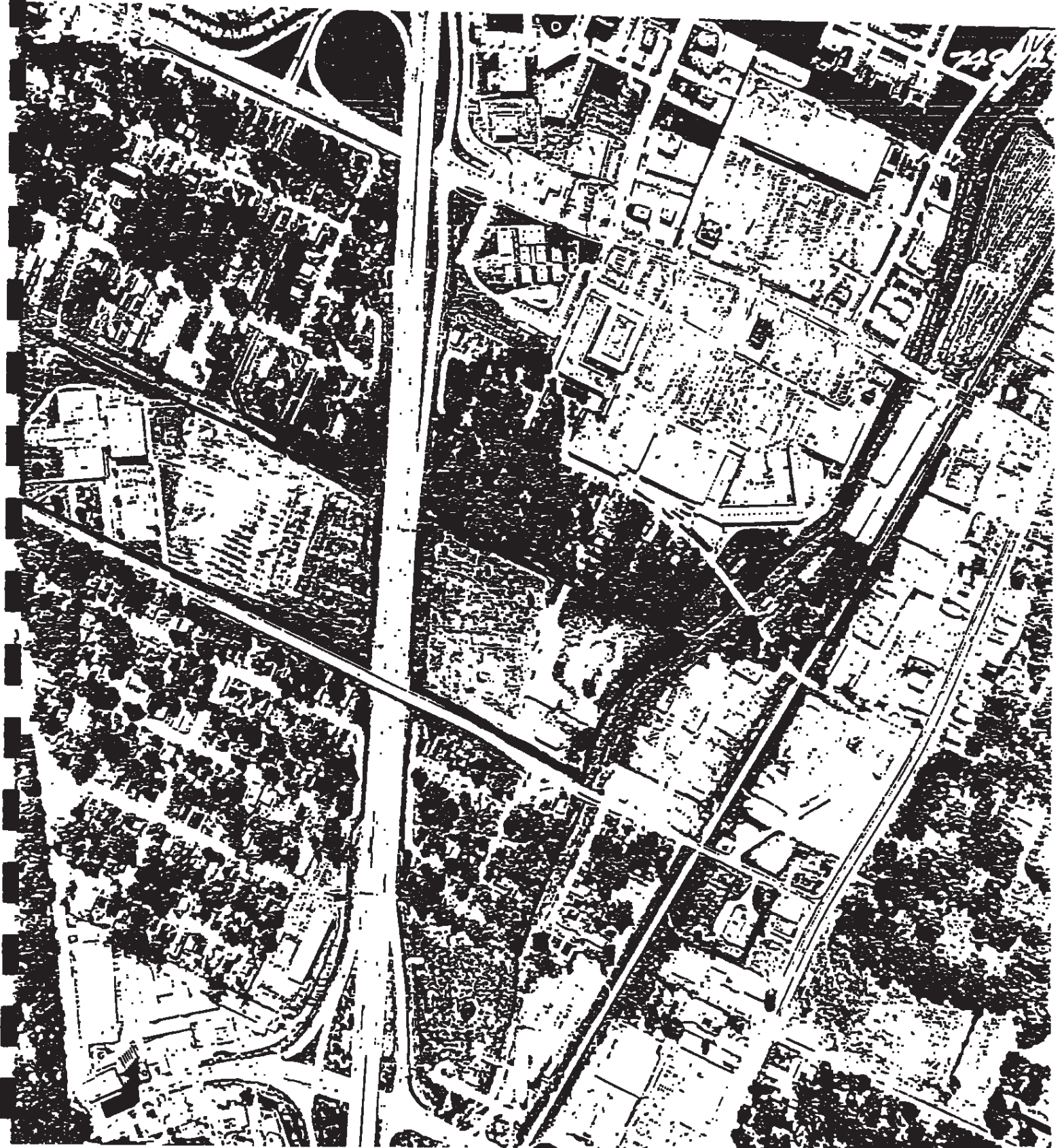
Valley Park Elementary Site  
(City of Baton Rouge, La., E. Baton Rouge Pk.)

Data taken from an Aerial Photo (La. DOTD 450-10-00, 749-29 taken 5-20-86) -

E80/4-1-89 Scale: 1" = 505'

AERIAL PHOTO (05-20-86)

← N



## 1.7 Summary of Previous Investigations

The PA completed by the LDEQ/IASD in August, 1989, revealed that three field investigations were previously conducted. A total of 27 priority pollutants in the form of volatile organics, semi-volatile organics, and heavy metals have been detected at locations on the site. These pollutants have the potential to come in direct contact with students, personnel, and the general public. Most detections of hazardous substances were from leachate from the landfill. The major concern is being the proximity of the administration building and the public recreation center/playground to the covered landfill. Another concern is that no containment structures exist at the landfill site except for a two foot clay cap. Site surface drainage and leachate from the site poses potential for contamination of nearby surface water pathways. It was concluded that further information was necessary to more fully characterize the site (Ref. 5).

The following is a chronological summary of investigative events concerning the Valley Park Complex Building and/or landfill to date.

1981-The Louisiana Department of Natural Resources (DNR), Hazardous Waste Management Division collected shallow soil, water and sediment samples from the landfill site. There were no detections of hazardous constituents from the samples, but more extensive sampling was recommended (Ref. 6).

1982-The Louisiana State University submitted a preliminary environmental assessment of the landfill site which detailed a sampling event which resulted in detection of zinc at 300 ppm, cadmium at 16 ppm; lead at 1120 ppm and arsenic at 53.0 ppm (Ref. 7).

1982-Gulf South Institute prepared an investigative report for DNR. Samples collected at the Valley Park Landfill resulted in low levels of some metals only (Ref. 8).

1986-Cox, Walker and Associates, Inc., consulting Engineers were unsuccessful in attempting to collect air samples of the indoor air environment at Valley Park School. The inspector noted he detected no odors, damaged vegetation, or chemicals (Ref. 9).

1988-The EBRP School Board contracted Arch Consulting Services, Inc., to test the indoor air for formaldehyde from Valley Park School in rooms 100 and 104. Formaldehyde was not detected. It was determined that, "the findings should not pose any significant problem for employees working in those areas" (Ref. 10).

1989-Arch Consulting Co., Inc., sampled ambient air in rooms no. 100 and no. 104, testing for formaldehyde, methane, carbon

dioxide and carbon monoxide. Detections reported were within safe guidelines. Biological monitoring of the building was recommended (Ref. 11)

1989-The Maintenance Division of the EBRP School Board cleaned and re-installed all air conditioning coils in the Valley Park Complex building. Six floor drains were plugged with cement in an office area that had previously been a kitchen. These drains had not been in use for some time, therefore sewer gas was possibly emitted into the building.

1990-The EBRP School Board contracted West-Paine Laboratories to test the drinking water for metals, fluorides, nitrates, volatile organics, radiologicals and pesticides/herbicides. All detections were within acceptable levels (Ref. 12).

1991-In September, 1991, an employee representative at Valley Park submitted results of health concerns to Dr. Bernard Weiss, Superintendent of EBRP Schools. The report identified numerous health complaints including neurologic, upper respiratory, ocular, and dermatologic symptoms. Employee proposals included extensive ambient air sampling of the building interior and campus grounds, examination of the ventilation system, and other proposals.

1991-October 7th, 8th and 9th. LDEQ/IAS personnel collect thirty-two field samples in accordance with SSI work plan dated April 7, 1991 (Ref. 13).

1992-In February, the LDEQ/IAS Division submitted an investigation report of the Valley Park Administration Center building to Dr. Bernard Weiss of the EBRP School board. The investigation was jointly conducted with the Louisiana Office of Public Health Section of Environmental Epidemiology. Indoor ambient air was sampled and tested for non-methane hydrocarbons, all compounds on the Target Compound List, CO<sub>2</sub>/O<sub>2</sub> concentrations, bacteria and fungi. No vapors were detected which could have originated from the previous landfill. Bacteria and Fungi were detected in the heating/air conditioning duct work. The general opinion was that the building had symptoms of sick building syndrome. Other findings were reported and other recommendations were made (Ref. 14).

## 2. DATA COLLECTION

### 2.1 On-Site Reconnaissance Inspection

Just prior to SSI sample collection in September 1991, a site reconnaissance inspection was made by Tom Mayhall of the LDEQ/IAS Division. Sampling locations were easily accessible. Leachate was flowing from the site into the adjacent ditch from three locations. Household Garbage coming from the landfill was apparent the full length of most of the bank of the adjacent ditch. The site was

inspected on other occasions by the LDEQ/IAS Division. Other inspections were primarily follow-up to citizen complaints of either building related health concerns or leachate coming from the site.

The landfill is easily accessible to the general public. There are no natural or artificial barriers preventing accessibility. Chain-link fencing is present around the site on the northern section (North of I10), but it is not continuous. There are numerous entry points in this area. An indoor environmental investigation of the Administration building resulted in the conclusion that landfill vapors were not detected in the building. The health related problems were most probably from fungi and bacteria in the ventilation system and inadequate air flow distribution (Ref. 14).

The Maximum Exposed Individual (MEI) locations and target distance determinations were made. The Valley Park Administration building is situated on top of the old landfill. There are approximately 300 occupants that are in the building in a normal eight hour day Monday through Friday (Ref. 1, 2 & 3) Approximately 1500 use the recreation center and 300 people use the outdoor recreation facilities on a monthly basis. The site is situated in a heavily populated residential area. The target population estimate based on the 1990 Census from 0 to  $\frac{1}{4}$  mile from the parameter of the site is 1,787 people (Ref 17). This figure does not include the number of people that use the site for recreation or occupants of buildings located on the site.

The landfill generally received household waste. It is not known if the site received industrial and/or commercial wastes. No records are available as to waste types. Nearby neighbors reported the site previously had an incinerator that burned garbage located just south of the Administration building. The site is not known to be underlain with a liner. The site is well drained with a three to five percent slope to the southeast. All surface drainage and leachate eventually flows into Dawson Creek.

On December 2, 1991, a public meeting was held at the Valley Park Complex building to determine health concerns in the building and area residents. The Louisiana Office of Public Health, Section of Environmental Epidemiology and the LDEQ/IASD held a public meeting December 2, 1991 at the Administration Building. The purpose of the meeting was to determine health related problems from occupants in the building and area residents. In response to reported health problems from employees of the Valley Park Administration building, LDEQ and the Office of Public Health (OPH), DHHR, undertook an indoor environmental investigation of the building. The objective of the investigation was to collect data which would define and help evaluate the indoor environment, locate potential sources of contamination, and evaluate the ventilation system for the purpose of making recommendations for corrective action. This resulted

into the Valley Park Administrative Center Investigative Report (Ref. 14).

## 2.2 Sampling Inspection

LDEQ/IASD staff conducted the sampling inspection on October 7, 8 and 9, 1991. On October 7 & 8, staff included Tom Mayhall (site safety officer and sampler), John Halk (team leader), Todd Thibodeaux (decontamination officer) and Kyle Moppert (sampler) of LDEQ/IASD and Thea Sloan (CLP Coordinator) with Ecology and Engineering (TAT). On October 9, Samples were collected by Tom Mayhall (team leader and site safety officer), Kyle Moppert (sampler) and Thea Sloan (CLP Coordinator). EPA tasked TAT team member Thea Sloan to tag, package, and ship samples in accordance with CLP criteria.

Sampling was needed to more fully characterize the site. Sample locations were chosen which would help determine if the site was posing a potential environmental and/or health threat. The locations were in accordance with the Valley Park School SSI Work Plan dated April 7, 1991 (Ref. 15). Locations were also chosen at previous sampling locations to qualify previous analytical results. The pathway of most concern was on-site exposure considering the high usage of the administration building and recreational facilities. Ground water and surface water pathways were also of concern because previous sampling of leachate indicated the presence of hazardous substances.

Nine (9) soil, seven (7) sediment, nine (9) surface water, One (1) rinsate and seven (7) ground water samples were collected, a total of thirty-three (33) samples. All sample containers were tagged, packaged and shipped according to Department of Transportation (DOT) requirements 49 CFR. Inorganic samples were shipped to Datachem laboratories and organic samples were shipped to Southwest Research Institute (Ref. 13)

2.3 Sampling Locations Table

SAMPLE #	MATRIX	LOCATION
----------	--------	----------

Note: Refer to sample location Plat

SS-1	SOIL	0-6" FROM A VACANT LOT BETWEEN 4581 AND 4615 BAWELL ST. 200 FT. N. OF STREET R. OF WAY
SS-2	SOIL	0-6" FROM N. SIDE OF BUILDING, 47' E. OF BUILDING, 12' S. OF SIDEWALK
SS-3	SOIL	0-6" IN LOW AREA 56' W. OF PAVED AREA IN LINE WITH CHAIN LINK FENCE AND 28' FROM CORNER OF BALL FIELD FENCE
SS-4	SOIL	0-6" FROM N. SIDE OF I-10 R. OF WAY IN 1' WIDE DRAINAGE 126' W. FROM SE FENCE CORNER AND 58' S. OF FENCE AND 8' N. OF LIGHT POLE
SS-5	SOIL	0-6" 95' N. OF I-10 CULVERT, 15' UP EMBANKMENT (SAME LOCATION AS SW-8)
SS-6	SOIL	FIELD DUPLICATE OF NO. SS-5
SS-7	SOIL	0-6" 427' N. OF NO. SW-8, 10' UP EMBANKMENT (SAME LOCATION AS SW-9)
SS-8	SOIL	0-6" IN LOW AREA 100' E. OF TWO WOODEN LIGHT POLES AND 64' S. OF FENCE
SS-9	SOIL	0-6" AT CHILDREN'S PLAYGROUND AREA 12' S. OF UTILITY POLE W/TRANSFORMER, 150' E. OF NAIRNE DR. BRIDGE
SW-1	SURFACE WATER	CENTER OF DAWSON CREEK 50' E. OF DRAINAGE DITCH OUTFALL AND 155' W. OF BALIS ST. BRIDGE
SW-2	SURFACE WATER	CENTER OF DAWSON CREEK 100' W. OF NAIRNE ST. BRIDGE
SW-3	SURFACE WATER	CENTER OF DRAINAGE DITCH 30' N. OF FERRET ST. BRIDGE
SW-4	SURFACE WATER	CENTER OF DRAINAGE DITCH 50' N. OF PAVED DRAINAGE DITCH
SW-5	SURFACE WATER	DISCHARGE WATER FROM CORRUGATED DRAIN (SURFACE WATER DRAINAGE)
SW-6	SURFACE WATER	EXTREME N. OF DRAINAGE DITCH DIRECTLY BELOW STORM WATER OUTFALL CENTER OF DRAINAGE DITCH



SAMPLE # MATRIX

LOCATION

Note: Refer to sample location Plat

SW-7	SURFACE WATER	FIELD DUPLICATE OF SW-6
SW-8	SURFACE WATER	LEACHATE FROM 15' UP EMBANKMENT, 95' N. OF I-10 CULVERT (SAME LOCATION AS SS-5
SW-9	SURFACE WATER	LEACHATE FROM 10' UP EMBANKMENT , 427' N. OF SW-8
SW-10	WATER	RINSATE FROM DECONNING SAMPLING TOOLS
S-1	SEDIMENT	CENTER OF DAWSON CREEK 50' E. OF DRAINAGE DITCH OUTFALL AND 155' W. OF BALIS ST. BRIDGE (SAME LOCATION AS SW-1)
S-2	SEDIMENT	CENTER OF DAWSON CREEK 100' W. OF NAIRNE ST. BRIDGE
S-3	SEDIMENT	CENTER OF DRAINAGE DITCH 30' N. OF FERRET ST. BRIDGE
S-4	SEDIMENT	CENTER OF DRAINAGE DITCH 50' N. OF PAVED DRAINAGE DITCH INTERSECTION
S-5	SEDIMENT	CENTER OF DRAINAGE DITCH 1' FROM STORMWATER OUTFALL DRAIN AT BAWELL ST.
S-6	SEDIMENT	FIELD DUPLICATE OF S-5
S-7	SEDIMENT	COLLECTED DIRECTLY FROM DISCHARGE FROM CORRUGATED DRAIN PIPE LOCATED NEAR BASKETBALL COURT DRAINING INTO DRAINAGE DITCH
GW-1	GROUND WATER	LSU-FOOTBALL PRACTICE FIELD, WELL I. D. NO. 302439091103001
GW-2	GROUND WATER	FIELD DUPLICATE OF GW-1
GW-3	GROUND WATER	LSU-PUMP HOUSE AT ACADIAN DORM WELL I. D. NO. 302456091101
GW-4	GROUND WATER	LSU-ROSE GARDEN WELL NO. 302443091101
GW-5	GROUND WATER	LSU-PUMPHOUSE AT SYSTEMS BUILDING WELL I. D. NO. 302434091103001

SAMPLE      MATRIX  
#

LOCATION

Note: Refer to sample location Plat

GW-6	GROUND WATER	M. NEHER RESIDENCE AT 861 DELGADO WELL I. D. NO. 302422091094
GW-7	GROUND WATER	J. OBERLING RESIDENCE AT 5620 BERKSHIRE DR. WELL I. D. NO. 302422091094 (BACKGROUND)

## 2.4 Sample I.D. Table

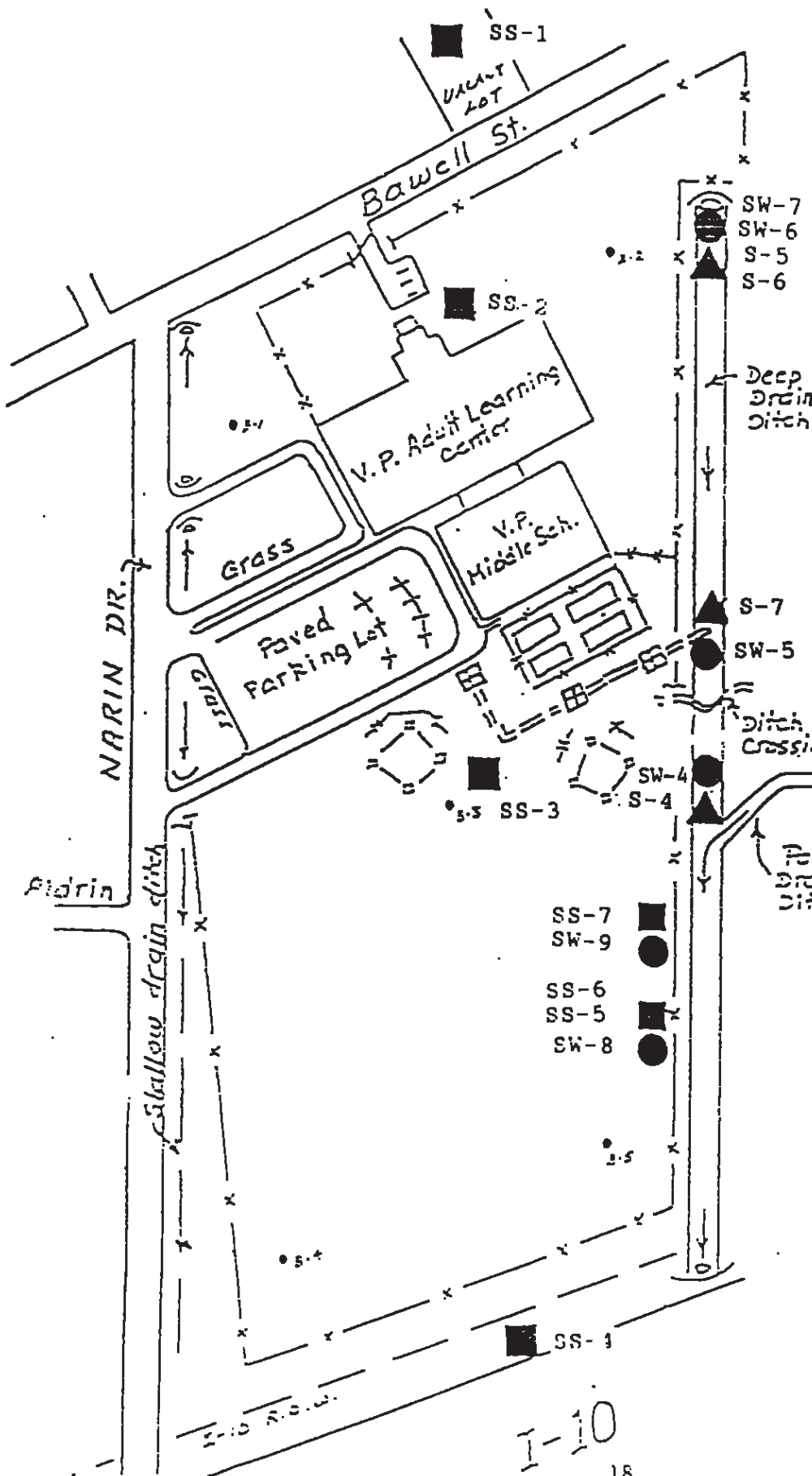
The following table details the station location number with the assigned Contract Lab Program (CLP) identification number.

STATION LOC	CLP ORGANIC NO.	CLP INORGANIC NO.
SS-1	FT218	MFR618
SS-2	FT219	MFR619
SS-3	FT220	MFR620
SS-4	FT221	MFR621
SS-5	FT222	MFR622
SS-6	FT223	MFR623
SS-7	FT224	MFR624
SS-8	FT225	MFR625
SS-9	FT226	MFR626
SW-1	FT201	MFR601
SW-2	FT202	MFR602
SW-3	FT203	MFR603
SW-4	FT204	MFR604
SW-5	FT205	MFR605
SW-6	FT206	MFR606
SW-7	FT207	MFR607
SW-8	FT208	MFR608
SW-9	FT209	MFRS09
SW-10	FT217	MFR617
S-1	FT210	MFR610
S-2	FT211	MFR611
S-3	FT212	MFR612
S-4	FT213	MFR613
S-5	FT214	MFR614

STATION LOC	CLP ORGANIC NO.	CLP INORGANIC NO.
S-6	FT215	MFR615
S-7	FT216	MFR616
GW-1	FT227	MFR627
GW-2	FT228	MFR628
GW-3	FT229	MFR629
GW-4	FT230	MFR630
GW-5	FT232	MFR632
GW-6	FT231	MFR631
GW-7	FT233	MFR633

2.5 Sample Location Plat (Northern Section)

VALLEY PARK SCHOOL (SSI)  
 SAMPLE LOCATION PLAT 10-9-91



**LEGEND**

MATRIX TYPE

- ▲ SEDIMENT
- AQUEOUS
- SURFACE SOIL

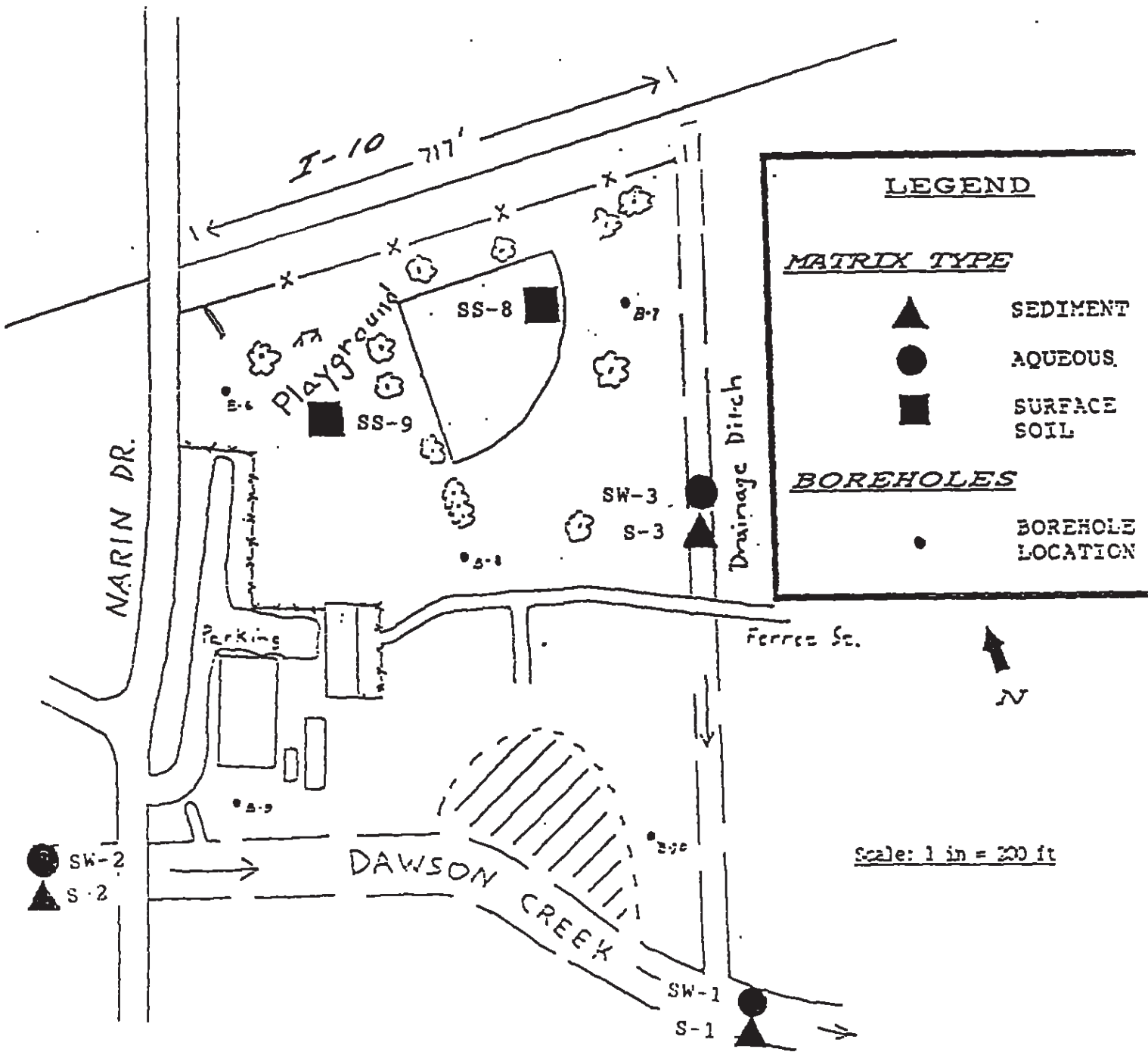
BOREHOLES

- BOREHOLE LOCATION

Scale: 1 in = 300 ft.

2.6 Sample Location Plat (Southern Section)

VALLEY PARK SCHOOL (SSI)  
 SAMPLE LOCATION PLAT 10-9-91

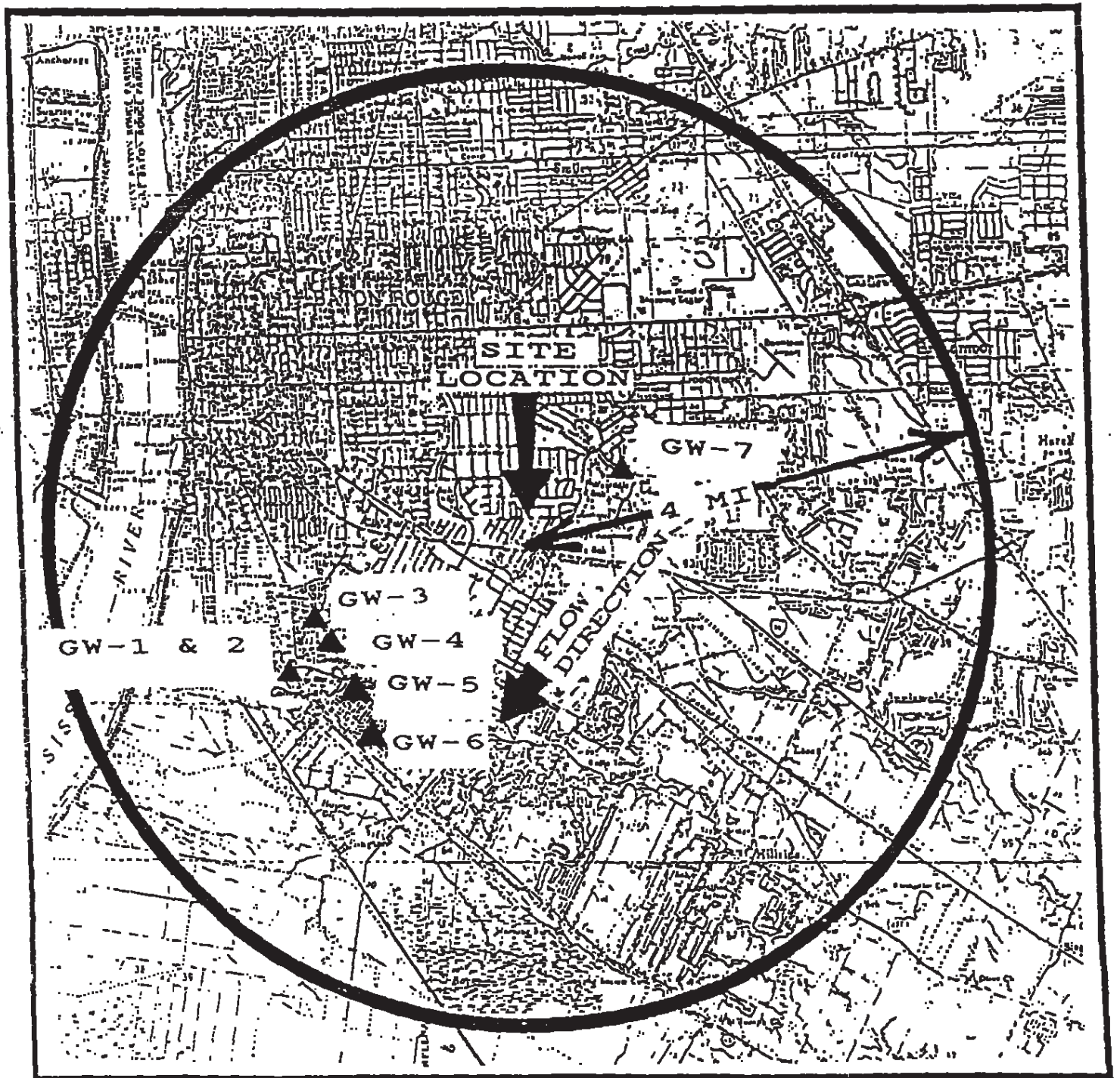




2.7 Sample Location Plat (Water Wells)

WATER WELL SAMPLING LOCATIONS

VALLEY PARK LANDFILL  
BATON ROUGE, LA



### 3. ANALYTICAL RESULTS

#### 3.1 Narrative

note: For complete explanation of Routine Analytical Services data flags, see RAS data flags definitions at the end of the Sample Analyses Summary Table (Appendix B).

#### Volatiles

Levels of 4 Target Compound List (TCL) volatile organic compounds were detected in 7 surface soil samples, 1 surface water sample and 5 sediment samples. No volatile organic compounds were detected in ground water samples (See Sample Analyses Summary Table). Ten of the 17 volatile detections were flagged "J" or "BJ", which indicates either the associated value is an estimated quantity or the associated value is an estimated quantity and is found in the associated blank as well as the sample. The concentrations of these 4 volatiles (Acetone, 2-Butanone, Chlorobenzene, Disulfide, Dimethyl) ranged from 4-33 ppb.

#### Pesticides/PCBs

Two TCL Aroclors and 7 TCL Pesticides were detected at a total of five sample locations for surface water sediments and surface soils: S-5, S-6, SS-4, SS-8, and SS-9. Sample S-6 is a field duplicate of S-5. These sediment samples were taken at the extreme northern point of the deep drainage ditch, just after drainage crosses underneath Bawell St. through a drain pipe and outfalls into the deep drainage ditch that borders the eastern edge of the Valley Park site. The Pesticides/PCBs detected in S-5 and Field Duplicate S-6 are from sediments falling from the urban surface water drainage north of Bawell Street.

Aldrin (11 UG/KG), 4,4'-DDT (12 UG/KG), and Aroclor-1248 (830 UG/KG) were detected in S-6. Aroclor-1242 (180 UG/KG) was detected in SS-4. Samples SS-4, SS-8, and SS-9 contained levels of 5 pesticides ranging from alpha-Chlordane (4.3 UG/KG) to 4,4'-DDE (17 UG/KG).

#### Semi-Volatiles and Tentatively Identified Compounds (TICs)

The greatest number of detections occurred in the TCL semi-volatile and tentatively identified compounds (TICs) analytical categories. Most of these detections (494 out of 538) were flagged with the following data qualifiers: B, J, BJ, and NJ (See qualifiers definition list at the end of the Sample Analyses Summary Table).

No TCL semi-volatile compounds or TICs were detected above the Sample Quantitation Limit (SQL) in ground water samples GW-1 ▶ GW-7. Di-n-butylphthalate was found in GW-1 ▶ GW-7 at levels below

the SQL (1-2 UG/L); Seven TICs were found in GW-1 ▶ GW-7 below the SQL and flagged "J" or "BJ".

No TCL semi-volatile compounds or TICs were detected above the SQL in the surface water samples SW-1 ▶ SW-10. All detections (< SQL) were flagged with "J", "BJ", or "NJ".

All deep drain ditch sediments and Dawson Creek sediments exhibited semi-volatile and TIC detections. Samples S-1, S-5, and S-6 (Field Duplicate of S-5) showed concentrations of semi-volatile compounds above the SQL. Sample S-5 and S-6 were located 1' from the storm water outfall drain just south of Bawell Street. These samples represent the storm water outfall coming from off-site areas north of the Valley Park site. Representative compounds detected include benzo(a)anthracene, benzo(a)pyrene, benzo(k)fluoranthene, fluoranthene, phenanthrene, and pyrene. Sediment samples S-4 and S-3, located in the deep drain ditch, showed estimated "J" values of only 5 semi-volatile compounds. Two of these compounds were also found in the associated blanks (See Sample Analyses Summary Table). Sample S-7, sediment collected directly below discharge from a corrugated drain pipe draining into the deep drain ditch, also showed estimated "J" values of 10 semi-volatiles. Two of the 10 detected compounds were also found in associated blanks.

Sample S-1, sediment from the farthest downstream location in Dawson creek, showed compounds and concentrations of compounds similar to those seen in Sample S-5 and S-6. It is notable that this sample was taken approximately 200' downstream from a city DPW construction debris pile.

All on-site soil samples (SS-2 ▶ SS-9) taken from 0-6" into the cap clay material of the Valley Park site showed various TCL semi-volatiles and TICs. All values were flagged with "J" (estimated values) or "BJ" (estimated values; value also found in the associated blank). All semi-volatile TCLs were below the SQL for the on-site soil samples. Some of these detections were also found in the off-site background sample, SS-1. No discernible pattern can be seen when comparing these values to either the background sample or between the samples themselves. The highest concentration target compound was fluoranthene at 390 UG/KG ("J" flagged) in SS-4. SS-5, SS-6 (field duplicate of SS-5), and SS-7 were samples taken of the red-stained or rust-colored soils present on the side of the west embankment of the deep drain ditch. Again, these samples showed no detections of semi-volatile TCL or TIC compounds above the SQL.

### Metals

Target Analyte List (TAL) inorganics were obtained for ground water, surface water, on-site soils, and surface water sediments.

Ground water samples (GW-1 ▶ GW-7) and surface water samples (SW-1 ▶ SW-9) exhibited no detections above the associated inorganics primary drinking water standards of the Safe Drinking Water Act (Ref. 25: 40 CFR 141.11).

Cyanide was found in surface water sample SW-5 (deep drain ditch) at a level of 120 UG/L, with decreasing levels detected downstream: SW-4 (21.2 UG/L), SW-9 (12.6 UG/L), SW-3 (16.1 UG/L), and SW-1 (11.2 UG/L).

On-site surface soils were compared with the background soil levels represented by SS-1. According to Table 2.3 of the USEPA Hazard Ranking System (40 CFR 300) an **observed release** is established when the sample measurement is 3 times or more above background, if the background concentration equals or exceeds the detection limit (Ref. 26).

Using the criteria above, observed releases were noted for non-priority and priority metals: aluminum, barium, cadmium, calcium, cobalt, copper, iron, mercury, potassium, silver, thallium, and zinc. Specifically, elevated levels of iron, calcium, aluminum, and potassium were seen in soil samples SS-5, SS-6 (field duplicate of SS-5), and SS-7. These were the soils that were stained with reddish coloration. Six priority metals (Arsenic, cadmium, copper, mercury, silver, and zinc) were compared with ranges of concentrations as depicted near the Baton Rouge area in "Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States" -- a USGS Professional Paper by Shacklette and Boerngen (Ref. 27):

Element	Detected Location	Detected Conc. or Conc. Range (ppm)	USGS PP 1270 Range (ppm)
Arsenic	SS-2,3,4,7,8	4.6 - 7.4	4.1 - 10
Cadmium	SS-2	1.3	not shown
Copper	SS-2	28.7	15 - 30
Mercury	SS-2	0.33	.2 -5.1
Silver	SS-2	0.79B	not shown
Zinc	SS-2,4,7,8	91.2 - 173	28 - 74

B - Indicates analyte was found in associated blank as well as the sample

Surface water sediment samples (S-1 ▶ S-7) were examined in the same way as for surface soils. Using sample S-2 (the most upstream Dawson Creek location) as representative of background concentrations for urban run-off sediments, observed releases were noted (3 times above S-2 concentrations) for arsenic, beryllium, cadmium, calcium, copper, iron, lead, manganese, nickel, thallium, vanadium, and zinc. All observed releases except for one (S-5) occurred in S-1, S-6 (Field duplicate of S-5), and S-7.

Priority pollutant metals were compared with the USGS Professional Paper 1270 element ranges found near the Baton Rouge area:

Element	Detected Location	Detected Conc. or Conc. Range (ppm)	USGS PP 1270 Range (ppm)
Arsenic	S-1	27.7	4.1 - 10
Beryllium	S-6	5	0 - 1
Cadmium	S-6	8.3	not shown
Copper	S-6,7	62.4 - 96.1	15 - 30
Lead	S-1,7	87.4 - 175	10 - 20
Nickel	S-6	137	20 - 700
Thallium	S-7	0.30B	not shown
Zinc	S-5,6,7	170 - 325	28 - 74

B: Indicates that analyte was found in the associated blank as well as the sample

Sample S-6 is located just south of Bawell Street, at the extreme North end of the deep drain ditch. It represents sediment that has accumulated from run-off coming from drainage points north of the site. Sample S-7 is located about mid-point between the I10 R.O.W. and S-6 (See map). S-1 is just downstream of the confluence of Dawson Creek with the deep drain ditch.

### 3.2 Sample Analyses Summary Table (See Appendix B)

This table presents all detections not flagged with a "U" data flag; the "U" qualifier indicates those compounds that were analyzed for but not detected.

The data qualifiers definitions and TCL Contract Required Quantitation Limits (CRQL) can be located at the end of the Sample Analyses Summary Table. The "Table" was derived from the CLP laboratory data submitted with this report.

Note: Matrix spikes (MS), matrix spike duplicates (MSD), and secondary dilution factor analyses (DL) samples are included in the "Table".

### 3.3 Data Validation Summary

Environmental data associated with samples taken from the Valley Park Site were subjected to data validation by the USEPA (or its contractor). The guidelines utilized for the data validation process were "Laboratory Data Validation Functional Guidelines for Evaluating Organics Analysis" (USEPA 1988) and "Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analysis" (USEPA 1988), for organic and inorganic data, respectively.

In general, the following criteria are typically considered when subjecting CLP (Contract Laboratory Program) formatted, organic analytical data to the data validation process:

Holding Times  
GC/MS Tuning  
Calibration  
Blanks  
Surrogate Recovery  
Matrix Spike / Matrix Spike Duplicates  
Field Duplicates  
Internal Standards Performance  
Overall Assessment of Data.

The criteria that are considered for validating inorganic data under the data validation guidelines are:

Holding Times  
Calibration  
Blanks  
ICP Interference Check Samples  
Laboratory Control Sample  
Duplicate Sample  
Furnace Atomic Absorption Quality Control  
ICP Serial Dilution  
Field Duplicates  
Overall Assessment of Data.

Once validated, data are qualified with codes (qualifiers) according to the data validation guidance criteria. A listing of the qualifiers and their respective definitions have been included as a table in this document.

#### 4. PATHWAY CHARACTERISTICS AND TARGET OBJECTIVES

Ground water, surface water, soil exposure and air pathway characteristics and targets are summarized below.

##### 4.1 Source/Waste Characterization

The potential on-site source of contamination is the municipal waste buried at the site. The City-Parish maintained no records as to types and/or quantities of waste materials received by its landfills prior to the early 1970's. It is estimated that the site includes thirty-six (36) acres of garbage/fill material approximately seven (7) feet deep covered by a two (2) foot clay cap.

There are no containment structures on the site except the clay cap. A site visit was made to verify the depth and condition of the clay cap. Ten boreholes were installed, B-1 through B-10, (See Sample Location Plats 2.4 & 2.5). A three inch hand operated auger was used for this purpose. The soil surface was penetrated from the surface to a maximum depth of five feet, or until garbage/fill was encountered. Each borehole had at least a two foot clay cap. Garbage/fill was encountered at each borehole at two to three feet.

The general condition of the cap appeared intact. There were no apparent outcroppings of garbage on top of the site. Outcroppings of trash/rubble were observed along the east side of the site along an open ditch (Ref. 16)

#### 4.2 Air Pathway

The site is located within a densely populated urban area, complete with multiple housing, shopping complexes, churches, restaurants, and other businesses. The target population within the four mile target radius limit is based on U.S. Census figures of 1990. The census was divided into census tracts sized between 2,500 and 8,000 residents that are similar in population characteristics. Target radiuses were superimposed on an enlarged map containing census tracts to facilitate the use of a planimeter to obtain an accurate count within each radius segment. The total population of each tract segment within a radius zone was obtained by determining the percent partial area multiplied by the total census tract population. The populations are as shown below (Ref. 17):

<u>RADIUS DISTANCE FROM SITE</u>	<u>POPULATION</u>
0 to $\frac{1}{4}$ mi	1,787
$\frac{1}{4}$ to $\frac{1}{2}$ mi	2,474
$\frac{1}{2}$ to 1 mi	6,048
1 to 2 mi	30,840
2 to 3 mi	45,066
3 to 4 mi	47,068

TOTAL POPULATION WITHIN A FOUR MILE RADIUS: 133,883

During field sampling, air monitoring conducted on-site with an organic vapor monitor (OVM) did not detect concentrations above background at the surface. An Indoor Air Investigation was conducted at the Valley Park Administration Building which sits atop the landfill. Based on the analytical results of the indoor air sampling, no harmful chemicals were being emitted into the indoor air environment of the building.

#### 4.3 Ground Water Pathway

East Baton Rouge Parish overlies twelve (12) freshwater aquifers aligned in layers of sand from 200 to 3100 feet below sea level. A blanket layer of hard pleistocene clay restricts migration between the surface ground water and the underlying sands.

The University Sand lies above the 400' Sand and is the most surficial aquifer containing water wells. The flow direction of the University sand aquifer in East Baton Rouge Parish appears to flow in a north to south-southwest direction, as does the "400 ft. sand". There is no documentation concerning horizontal flow patterns for this aquifer, however the "University sand" and the



"400 foot" sand are considered to have a close relationship in that they interconnect. Therefore, the best assumption is that the University Sand most probably flows in the same direction as the "400 ft. sand". Ground water direction is well documented for the 400 'sand. (Ref 18).

Five well samples were collected from 334 to 361 feet in depth located in the University Sands, one of which was a duplicate. Four wells are located down-gradient from the site and, as well as could be determined, are the shallowest and closest wells to the site. One background sample was collected up gradient, north of the site, at a depth of 390 ft.

#### 4.4 Surface Water Pathway

An open drainage ditch bounds the site on the east side, and flows southwesterly into Dawson Creek. It is approximately 60 feet in width and 20 feet deep from the top of the landfill cap to the bottom of the drainage ditch. The ditch serves as a major drainage system for the residential area North of the site. Dawson Creek borders the southern end of the site. Surface run-off and leachate from the site eventuates into Dawson Creek. Dawson Creek flows southeasterly 6.3 miles emptying into Ward's Creek. At a point 12.3 miles downstream from the site, Ward's joins Bayou Manchac. The target distance limit of fifteen (15) miles is reached 2.7 miles downstream on Bayou Manchac, where Welsh Gully intersects.

The Bayou Manchac is used for recreational purposes including fishing and hunting. Residential dwellings exist along the Bayou Manchac within the fifteen (15) mile target distance limit. No declared wetland and/or sensitive environments exist within the 15 mile target distance limit (Ref. 19 & 20). There are no known drinking water intakes along the 15 mile target limit distance limit (Ref. 21).

#### 4.5 On-Site Exposure Pathway

The onsite exposure pathway is of high concern considering the high usage and location of the administration building and the recreational facilities.

Three areas have been targeted for on-site exposure pathway consideration and are: (1) observed intermittent leachate flowing into the drainage ditch just south of the school building, (2) the recreational surface play areas, (3) and the surface area around the administration building. Samples were collected from all of these areas and results discussed in Section 3.1. There is a 2 foot clay cap over the former landfill area. Exposed areas along the east deep drain ditch, the south bank of the northern landfill section, and deep drain ditch and Dawson Creek sediments exhibited detections of hazardous substances above the SQL. Designation of Areas of Contamination (AOCs) are difficult due to the sparse

number and concentration level of positive contaminant detections. No patterns of migration of hazardous substances from the landfill were noted, when comparing surface soils SS-5, 6, and 7 with sediment samples S-7,4,3, and 1. Zinc was the only compound that was evident in samples from the bank of the ditch and also in the ditch sediment. It is difficult to designate the deep drain ditch as an area of contamination (AOC) due to the landfill because of the heavy influence of urban storm water run-off from areas north of the site.

### Resident Populations

The northern 23 acre section of the Valley Park site includes the Valley Park Administration Complex, parking lots, basketball courts, and two baseball fields. Approximately 300 people occupy the building on a full or part-time basis.

The southern area, totaling 13 acres, is occupied by the East Baton Rouge Parish Recreation and Parks Commission and the Baton Rouge City Parish. This area includes an indoor recreation center, three adjacent buildings, a baseball field, an adolescent playground area, and a large stockpile of dirt and rubble used by the Department of Public Works. Approximately 1500 people use the recreation center and approximately 300 people use the outdoor facilities on a monthly basis. The three buildings are occupied by 27 City/Parish staff members (Ref. 1,2, & 3).

## 5. PROJECT MANAGEMENT

### 5.1 Key Personnel

On October 7 & 8, 1991, staff included Tom Mayhall (site safety officer and sampler), John Halk (team leader), Todd Thibodeaux (decontamination officer) and Kyle Moppert (sampler) of LDEQ/IASD and Thea Sloan (CLP Coordinator) with Ecology and Engineering (TAT). On October 9, 1991, samples were collected by Tom Mayhall (team leader and site safety officer), Kyle Moppert (sampler) and Thea Sloan (CLP Coordinator). EPA tasked TAT team member Thea Sloan to tag, package and ship samples in accordance with CLP criteria.

The Project Manager for the SSI sampling was Tom Mayhall, who developed the work plan, gained site access (Ref. 22, 23 & 24), and was the site safety officer. John Halk was the field team leader October 7 and 8, 1991 and Tom Mayhall was the field team leader October 9, 1991. TAT team member Thea Sloan was the CLP coordinator. The remaining sampling team members were Todd Thibodeaux and Kyle Moppert.

## 6. CONCLUSIONS

A total of 33 environmental samples (including QA/QC samples) were taken at the Valley Park School (LAD985170273) by the Inactive and

Abandoned Sites Division, LDEQ, under a multi-site grant administered by the State. The sampling episode was performed during the period October 7-9, 1991. Contract Laboratory Program (CLP) procedures were followed with regard to identifying, tagging, shipping, and analyzing the samples. Although not a part of the SSI Workplan, air monitoring was done at the site. An Indoor Air Investigation (Ref. 14) was completed by DEQ/DHHR at the Valley Park Administration Complex. This study was in response to many reported health problems from occupants in the building, mostly respiratory in nature. The study concluded that, based on the analytical results of the indoor air sampling, no harmful chemicals were being emitted into the indoor air environment of the building. An organic vapor monitor (OVM) did not detect emissions at the site surface at the various sample locations. Analytical results from ground water samples collected in the "University Sands" between 334 and 361 feet in depth and down-gradient from the site indicate that contamination is not present in the strata studied. Surface water analytical results indicated no volatile, semi-volatile and TICs, or pesticides/PCBs above the SQL. Low concentrations of cyanide was found in the deep drain ditch surface water, with decreasing levels downstream.

Surface water sediments exhibited detections of TCL and TAL compounds. Most of the compounds detected were below the SQL. For example: 494 of 538 Semi-volatile and TIC detections for all samples were flagged with the data qualifiers "B", "J", "BJ", or "NJ". For sediment samples, a definite contaminant influence of urban run-off is seen in the drainage coming into the deep drain ditch north of the site (above Bawell Street). Observed releases were documented for sediments within the study area. Most of these releases occurred in S-5 and S-6, located just south of the Bawell Street culvert crossing. A pattern of migration of observed release contaminants was not readily discernible above the "background noise" of the urban run-off contaminant influence. The metal Zinc was the only element found that constituted an observed release and was found in both the reddish-stained soils of the deep ditch bank and the deep ditch sediments.

Low detections of organics in the on-site surface soils (almost all below the SQL) do not indicate a migration of potential hazardous constituents from the landfill. Possible explanations for the detections include import of clay fill material from another geographical location with accompanying background concentrations, past application of herbicides and insecticides in routine maintenance, and hydrocarbon emissions or fuel leaks from grass-mowing machines used at the site.

7. APPENDICES

APPENDIX A

PHOTO NO.  
1



PHOTOGRAPHER/WITNESS KYLE MOPPERT

DATE 10-8-91 TIME 1000 HRS DIRECTION N

DESCRIPTION SAMPLE NO SS-1

PHOTO NO.  
2



PHOTOGRAPHER/WITNESS KYLE MOPPERT

DATE 10-8-91 TIME 1030 HRS DIRECTION SSE

DESCRIPTION SAMPLE NO SS-2



PHOTO NO.  
3

PHOTOGRAPHER/WITNESS KYLE MOPPERT/TOM MAYHALL

DATE 10-8-91 TIME 1100 hrs DIRECTION W

DESCRIPTION SAMPLE NO SS-3



PHOTO NO.  
4

PHOTOGRAPHER/WITNESS KYLE MOPPERT/TOM MAYHALL

DATE 10-8-91 TIME 1200 hrs DIRECTION N

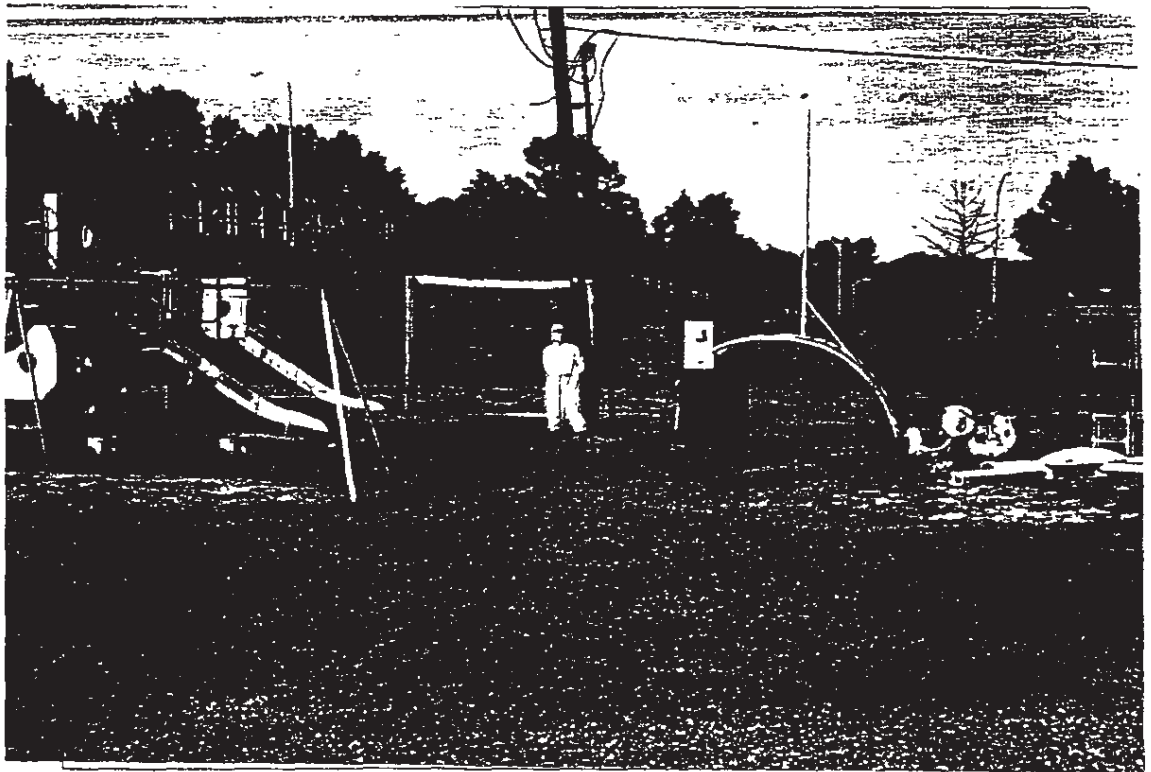
DESCRIPTION SAMPLE NO SS-4

PHOTO NO.  
5



PHOTOGRAPHER/WITNESS KYLE MOPPERT/TOM MAYHALL  
DATE 10-8-91 TIME 1215 hrs DIRECTION E  
DESCRIPTION SAMPLE NO SS-8

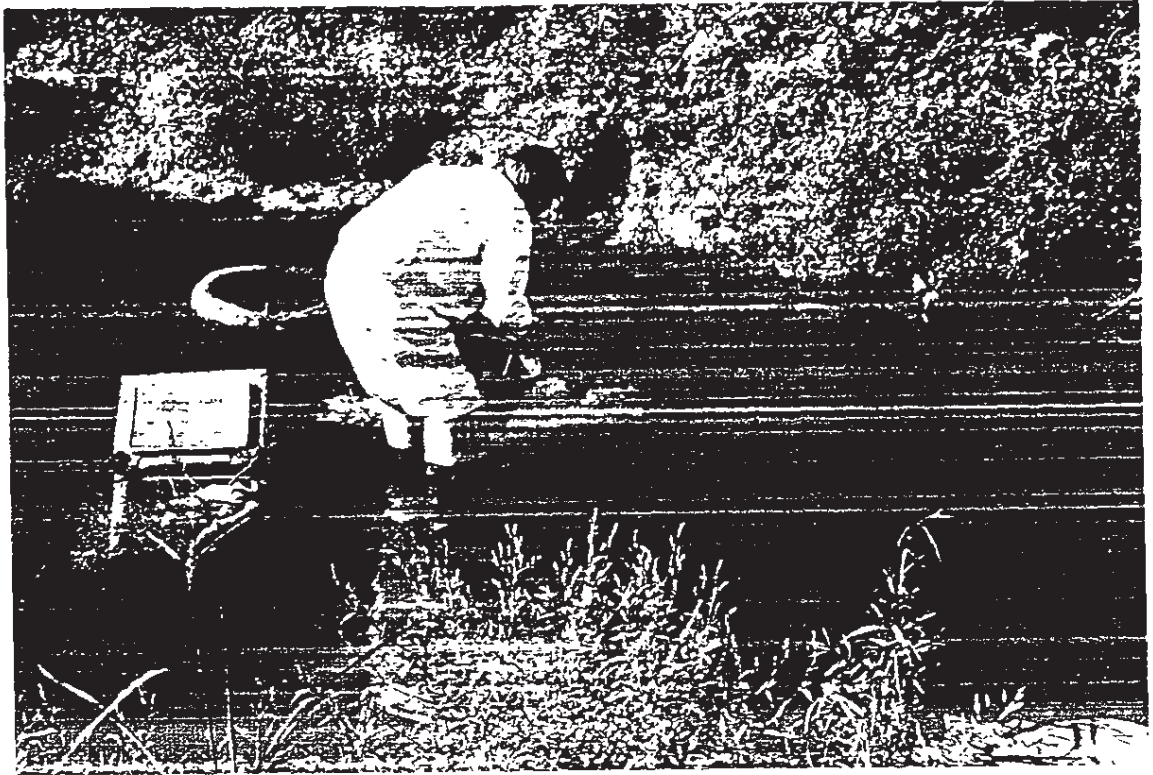
PHOTO NO.  
6



PHOTOGRAPHER/WITNESS KYLE MOPPERT  
DATE 10-8-91 TIME 1230 hrs DIRECTION N  
DESCRIPTION SAMPLE NO SS-9



PHOTO NO  
7



PHOTOGRAPHER: KYLE MOPPERT  
WITNESS: TOM MAYHALL  
DATE: 10-9-91  
TIME: 0900 hrs  
DIRECTION: S  
DESCRIPTION: SAMPLE NO S-1



PHOTOGRAPHER: KYLE MOPPERT  
WITNESS: TOM MAYHALL  
DATE: 10-9-91  
TIME: 0930 hrs  
DIRECTION: NW  
DESCRIPTION: SAMPLE NO S-2



PHOTO NO  
8



PHOTO NO.  
9

PHOTOGRAPHER/WITNESS KYLE MOPPERT/TOM MAYHALL

DATE 10-9-91 TIME 1000 hrs DIRECTION N

DESCRIPTION SAMPLE NO S-3



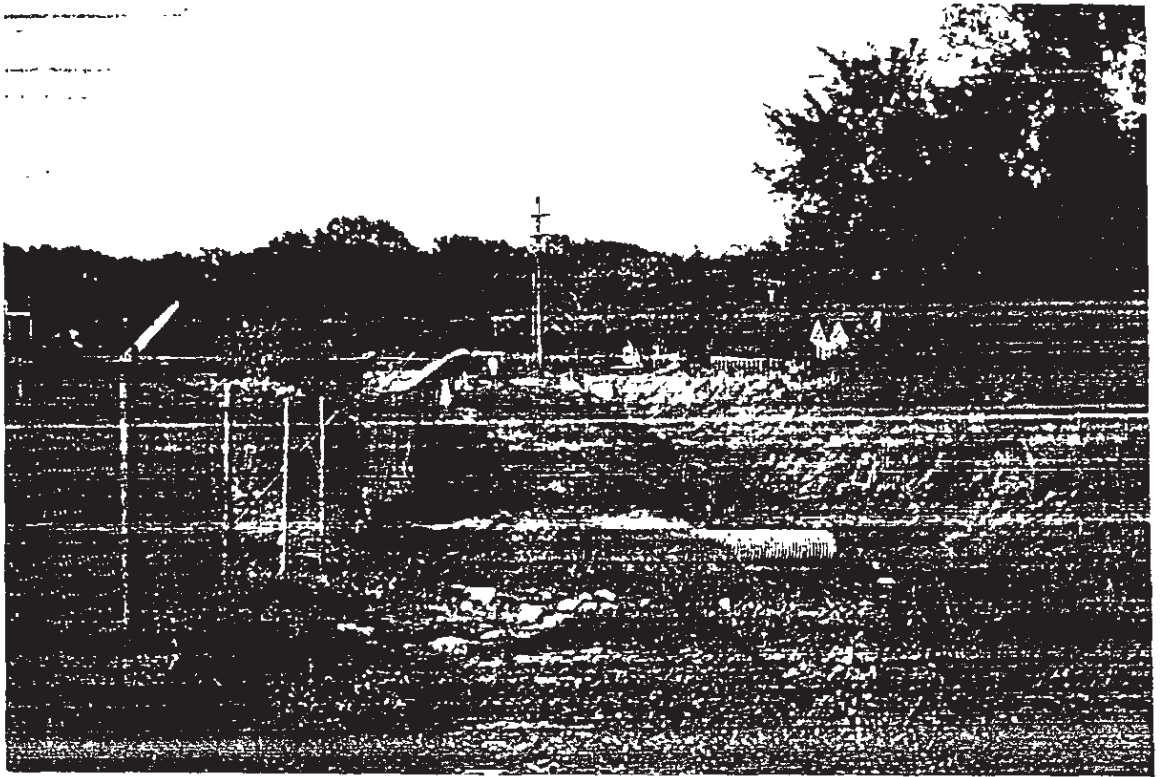
PHOTO NO.  
10

PHOTOGRAPHER/WITNESS TOM MAYHALL/KYLE MOPPERT

DATE 10-9-91 TIME 1030 hrs DIRECTION E

DESCRIPTION SAMPLE NO S-4

PHOTO NO  
11



PHOTOGRAPHER: JOHN BALK  
WITNESS: TOM MAYHALL  
DATE: 10-9-91  
TIME: 1100 hrs  
DIRECTION: N  
DESCRIPTION: SAMPLE NO S-6

PHOTOGRAPHER: TOM MAYHALL  
WITNESS: KYLE MOPPERT  
DATE: 10-9-91  
TIME: 1130 hrs  
DIRECTION: NW  
DESCRIPTION: NO S-7

PHOTO NO  
12



PHOTO NO.  
13



PHOTOGRAPHER/WITNESS JOHN HALK/TOM MAYHALL  
DATE 10-9-91 TIME 1200 hrs DIRECTION N  
DESCRIPTION SAMPLE NO SW-3

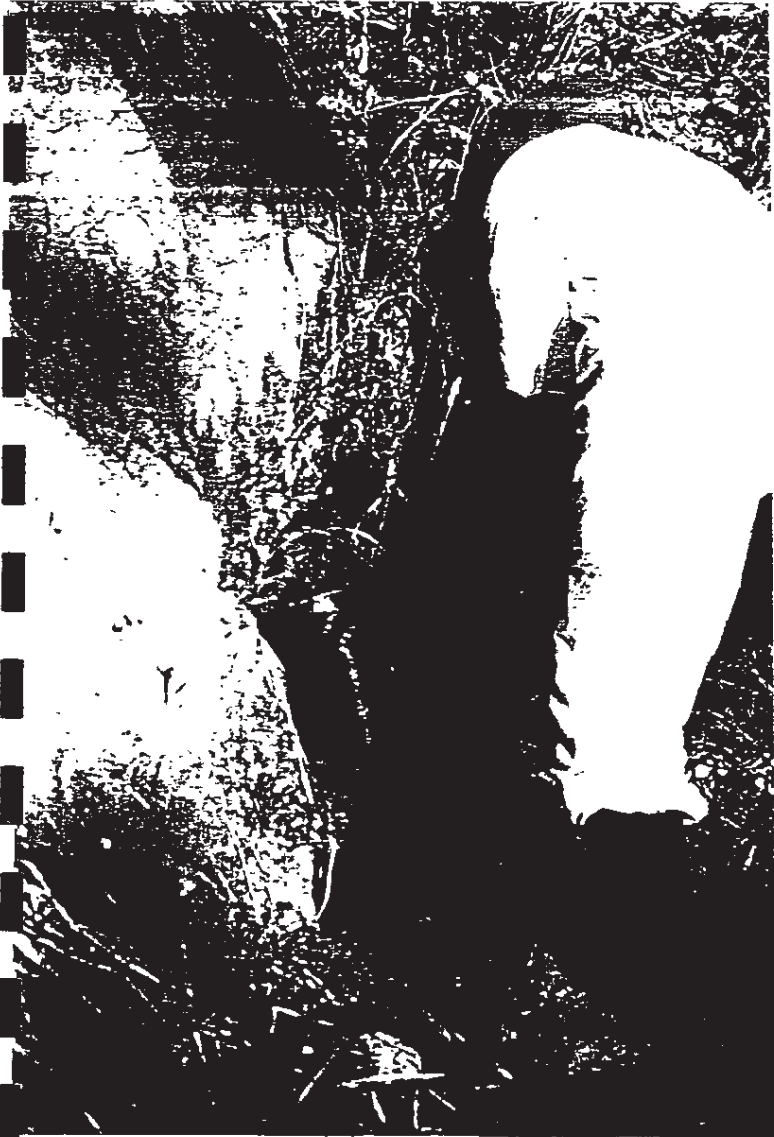
PHOTO NO.  
14



PHOTOGRAPHER/WITNESS JOHN HALK/TOM MAYHALL  
DATE 10-9-91 TIME 1230 hrs DIRECTION E  
DESCRIPTION SAMPLE NO SW-4

PHOTO NO  
15

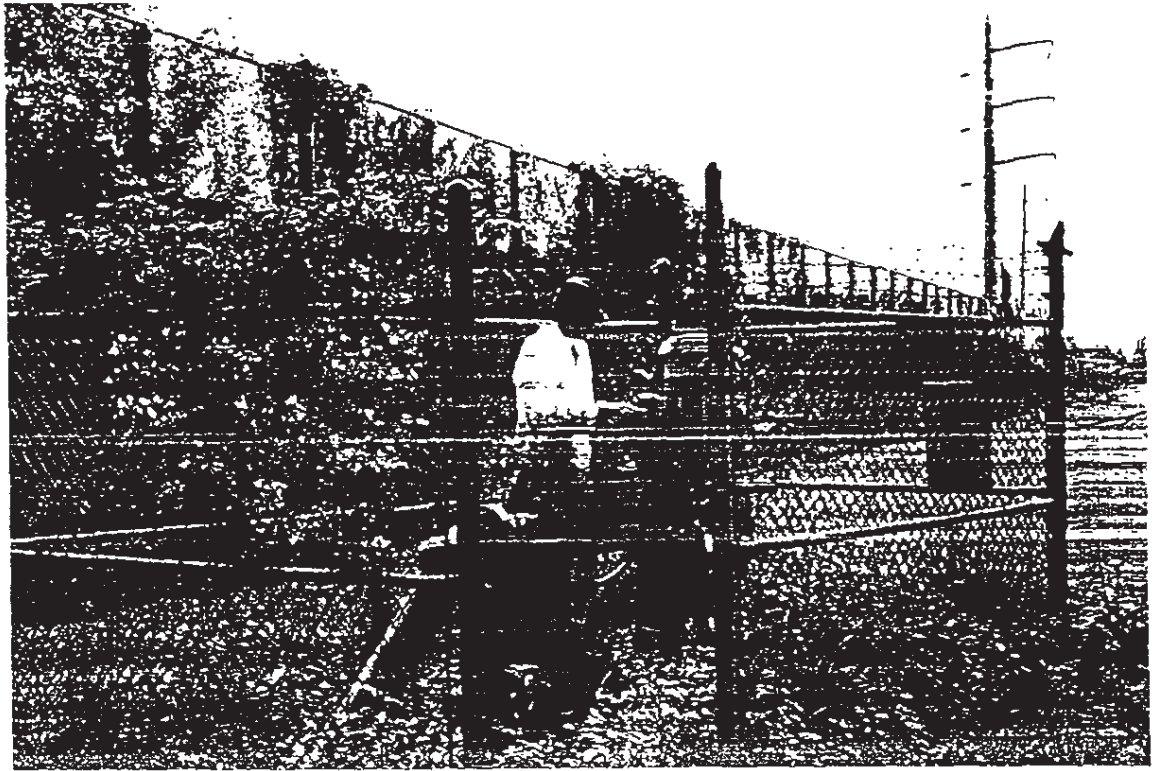
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WITNESS: TOM MAYHALL  
DATE: 10-9-91  
TIME: 1300 HRS  
DIRECTION: E  
DESCRIPTION: SAMPLE NO SW-5



PHOTOGRAPHER: JOHN HALK  
WITNESS: TOM MAYHALL  
DATE: 10-9-91  
TIME: 1300 HRS  
DIRECTION: NW  
DESCRIPTION: SAMPLE NO SW-8

PHOTO NO  
16

PHOTO NO  
17



PHOTOGRAPHER: JOHN HALK  
WITNESS: TOM MAYHALL  
DATE: 10-10-91  
TIME: 0900 HRS  
DIRECTION: SE  
DESCRIPTION: SAMPLE NO GW-1 & GW-2



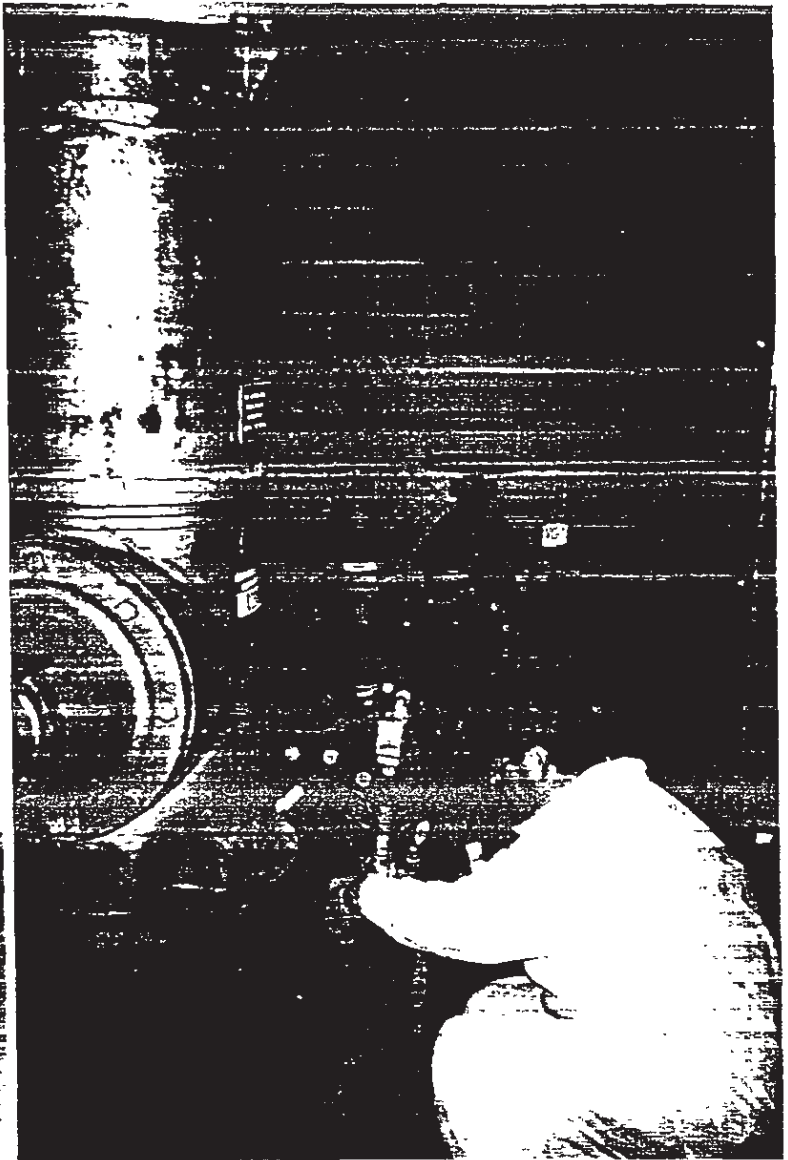
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WITNESS: TOM MAYHALL  
DATE: 10-9-91  
TIME: 1400 HRS  
DIRECTION: NW  
DESCRIPTION: SAMPLE NO SW-9



PHOTO NO  
18

PHOTO NO  
19

PHOTOGRAPHER: TOM MAYHALL  
WITNESS: KYLE MOPPERT  
DATE: 10-10-91  
TIME: 0930 HRS  
DIRECTION: E  
DESCRIPTION: SAMPLE NO GW-3

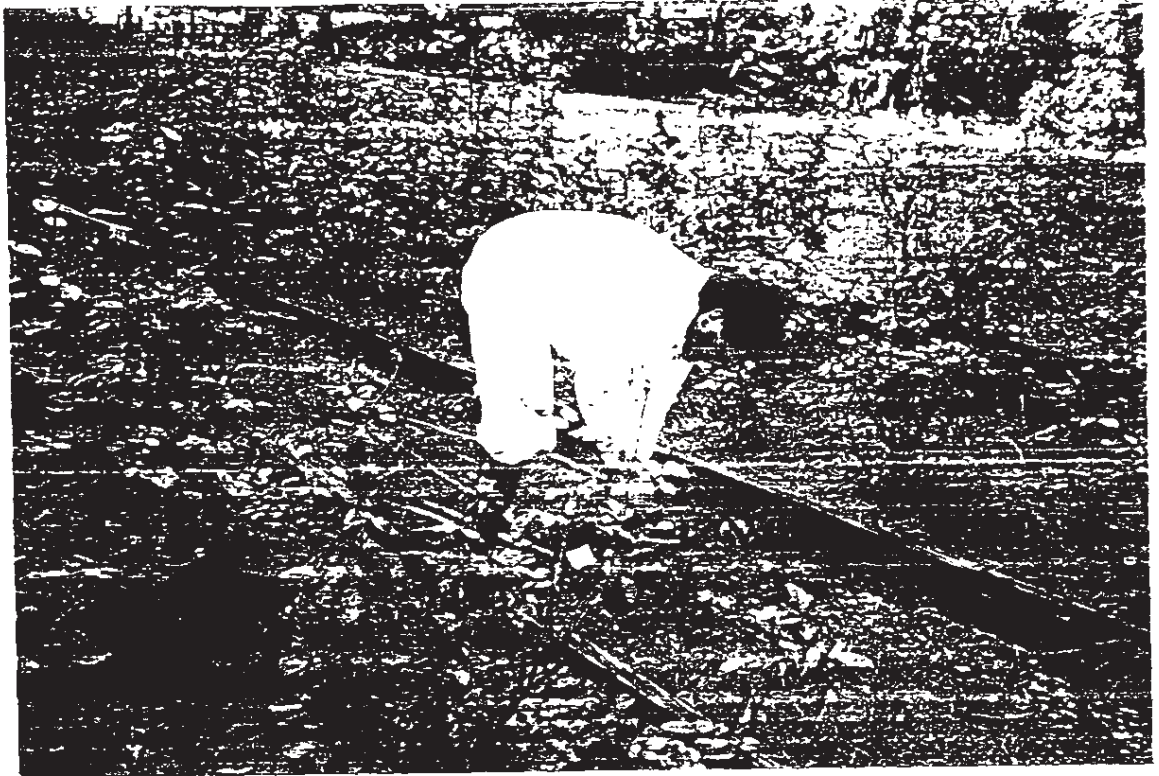


PHOTOGRAPHER: TOM MAYHALL  
WITNESS: KYLE MOPPERT  
DATE: 10-10-91  
TIME: 1000 HRS  
DIRECTION: N  
DESCRIPTION: SAMPLE NO GW-4

PHOTO NO  
20



PHOTO NO.  
21



PHOTOGRAPHER: TOM MAYHALL  
WITNESS: KYLE MOPPERT  
DATE: 10-10-91  
TIME: 1000 HRS  
DIRECTION: NW  
DESCRIPTION: SAMPLE NO CW-6



PHOTOGRAPHER: TOM MAYHALL  
WITNESS: KYLE MOPPERT  
DATE: 10-9-91  
TIME: 1030 HRS  
DIRECTION: SAMPLE NO GW-5  
DESCRIPTION:

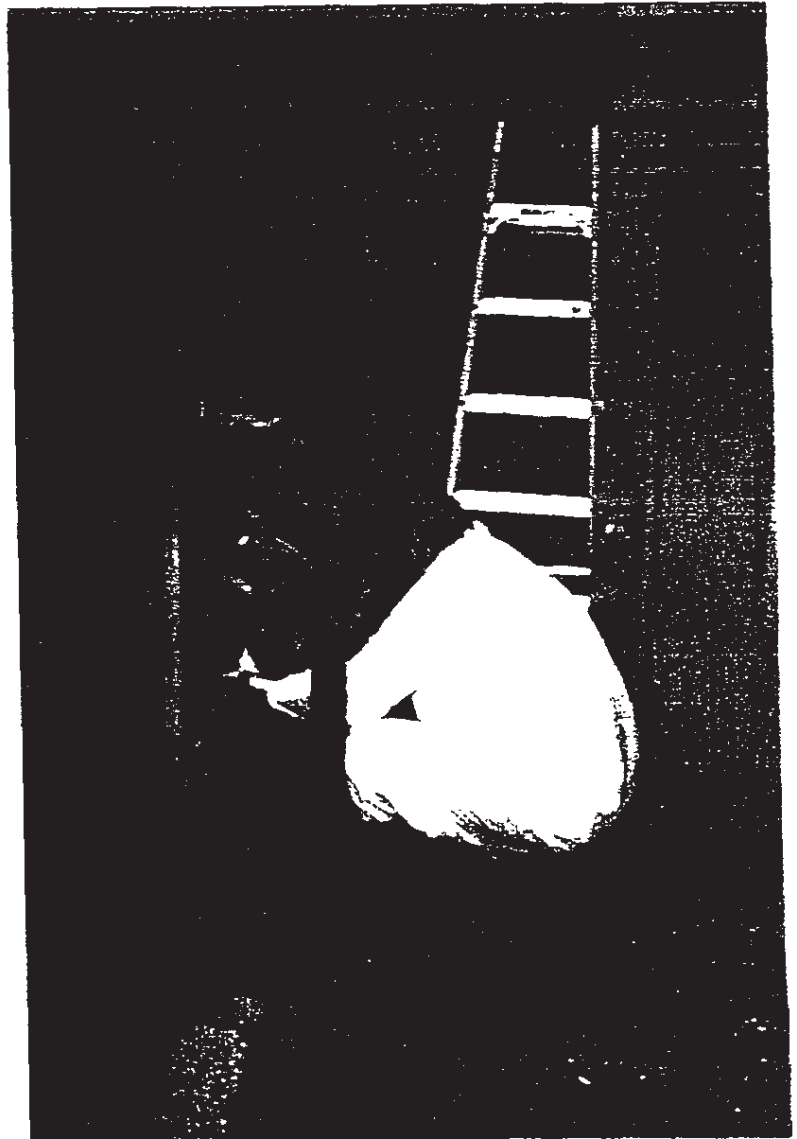


PHOTO NO.  
22





PHOTO NO.  
23

PHOTOGRAPHER/WITNESS TOM MAYHALL/KYLE MOPPERT  
DATE 10-10-91 TIME 1400 HRS DIRECTION NE  
DESCRIPTION SAMPLE NO. CW-7

**APPENDIX B**

Valley Park Site - Baton Rouge, Louisiana									
Sample Analyses Summary Table					Pesticides/PCB's				
Lab Number	FT210MS	FT210MSD	FT214	FT215	FT215DL	FT221	FT225	FT226	Numbers FT210MS-FT226
Sample Num	S-1	S-1	S-5	S-6	S-6	SS-4	SS-8	SS-9	
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	
Conc. Units	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	

Aldrin	15	18		11.P	32.P				
alpha-Chlordane	13	13				4.3P		5.2P	
Aroclor-1232						180			
Aroclor-1248				830	1700				
4,4'-DDD	26.P	13					6.5	4.6P	
4,4'-DDE	26.P	12				6.9P	4.4	17.P	
4,4'-DDT	39.P	40.P		12.P					
delta-BHC						5.2P			
Dieldrin	55	56							
Endrin	36.P	23.P							
gamma-BHC (Lindane)		14							
gamma-Chlordane	16	17.P	11.P			16.P		4.9P	
Heptachlor	18	20							

Notes:  
DL - Indicates sample or extract was reanalyzed at a high dilution factor.  
MS - Indicates sample was a matrix spike.  
MSD - Indicates sample was a matrix spike duplicate.

Valley Park Site - Baton Rouge, Louisiana

Metals

Sample Analyses Summary Table

Numbers MFR601 - MFR616

Lab Number	MFR601	MFR602	MFR603	MFR604	MFR605	MFR606	MFR607	MFR608	MFR609	MFR610	MFR611	MFR612	MFR613	MFR614	MFR615	MFR616
Sample Num	SW-1	SW-2	SW-3	SW-4	SW-5	SW-6	SW-7	SW-8	SW-9	S-1	S-2	S-3	S-4	S-5	S-6	S-7
Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Conc. Units	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG

Aluminum	347	229	628	970	141B	277	122B	71.3B	123B	7290	12800	16300	23600	24800	16300	10300
Antimony									33.8B							
Arsenic	4.8B	4.0B	1.6B	1.9B	2.8B	3.1B	3.3B	1.4B	1.6B	27.7	5.8	0.90B	2.7	7.5	4.8	8.2
Barium	73.1B	53.5B	162B	125B	139B	166B	154B	66.4B	101B	272	475	226	113	233	355	167
Beryllium										1.2B	1.1B	0.75B	0.59B	1.2B	5	0.82B
Cadmium											1.1B				8.3	
Calcium	34400	27600	38100	28700	28700	32300	31200	33800	33400	19900	2700	3270	2440	4610	13200	5830
Chromium		9.9B			13.5			15.1		22.5	20.5	20.8	26.3	44.8	16.4	22.5
Cobalt					11.0B			7.4B		18	73.3	8.0B	4.0B	13.6	94.8	13.4B
Copper	29.4	14.3B	5.9B	15.1B	13.4B	13.4B	18.5B			18.9	11.3	8.4	10.3	23	62.4	96.1
Iron	388	351	1080	977	4880	490	98.0B	1850	1130	27100	25800	14700	18300	28100	70800	35400
Lead	7.5	5.2	4.1	4.7	6.2	3.1	2.7B	3.7	1.1B	175	25.5	9	11.2	55.7	44.1	87.4
Magnesium	8990	6460	16300	10500	19400	7850	7320	16200	17700	1700	1990	2250	1990	3660	2550	1910
Manganese	117	125	86.8	39	97.8	198	184	90.6	141	1780	2550	720	125	592	16500	1430
Mercury														0.39	0.62	0.25
Nickel	23.1B				17.3B			17.3B	16.8B	15.1	29.7	13.3	12.5	24.6	137	22.4
Potassium	6000	7620	11200	7080	55600	5900	5900	33370	26900	448B	672B	1020B	737B	2440	1070B	548B
Selenium										0.39B						
Silver																
Sodium	93100	93500	88400	97200	102000	96200	94000	61400	56400	155B	147B	161B	192B	223B	207B	134B
Thallium																0.30B
Vanadium	5.2B		4.1B	4.1B		3.1B	3.2B		3.0B	52.4	58.8	28.2	44.9	63.6	219	40.8
Zinc	25.2	23.5	16.9B	28.2	59.5	18.2B	18.8B	9.2B	9.2B	125	34.3	40.9	32.5	325	315	170
Cyanide	11.2		16.1	21.2	120				12.6							

Notes:  
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 MS - Indicates sample was a matrix spike.  
 MSD - Indicates sample was a matrix spike duplicate.

Valley Park Site - Baton Rouge, Louisiana

Metals

Numbers MFR617 - MFR633

Sample Analyses Summary Table

Lab Number	MFR617	MFR618	MFR619	MFR620	MFR621	MFR622	MFR623	MFR624	MFR625	MFR626	MFR627	MFR628	MFR629	MFR630	MFR631	MFR632	MFR633
Sample Num	SW-10	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	GW-1	GW-2	GW-3	GW-4	GW-6	GW-5	GW-7
Matrix	Water	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Water	Water	Water	Water	Water	Water	Water
Conc. Units	UG/L	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L
Aluminum	84.3B	7820	11100	16800	14400	19200	18400	25000	17000	7070	88.0B	30.4B	131B	103B	43.4B	50.8B	117B
Antimony											34.9B	31.4B				35.8B	
Arsenic		1.4B	4.6	7.4	5.2	4.2	3.6	5.3	4.9	1.1B	27.9	34.9B					1.1B
Barium	1.8B	97.7	332	324	170	141	167	121	180	99.9	439	461	404	280	207	361	57.3B
Beryllium		0.53B	0.86B	1.1B	0.77B	1.3B	0.76B	0.93B	0.88B	0.35B							
Cadmium			1.3														
Calcium	55.6B	538B	4110	4820	3210	2260	2540	1780	2760	4910	101000	102000	80100	39500	30200	73800	3760B
Chromium		10.1	24	21.5	21.5	25.8	22.7	29.9	22.6	8.6							
Cobalt		4.3B	14.4	9.8B	7.3B	9.8B	7.5B	15	6.7B	3.8B							
Copper	10.9B	8	28.7	12.3	18.9	10	10.5	20.1	19.2	7.6	13.4B		12.6B	11.7B		5.0B	25.2
Iron	37.4B	7150	25700	18900	22000	31400	38500	27700	17400	7730	74.8B	1800	1230	115	134	43.1B	276
Lead	2.1B	28.5	81.2	17.1	16.9	10.9	7.3	14	56.1	21.5		1.1B	2.6B	1.2B	1.9B	2.5B	1.8B
Magnesium	26.3B	484B	2250	3270	1820	3200	2970	3420	1950	695B	29900	30200	27100	12800	9400	24000	1670B
Manganese		819	1640	1460	167	130	127	156	489	364	240	242	176	150	139	350	98.2
Mercury			0.33														
Nickel		9.6B	20.4	19	16.9	19.8	19.4	21.7	16.8	4.3B							
Potassium		297B	949B	1250	1160B	1520B	1590	1960	1200B	352B	2460B	2300B	1510B	1620B	1600B	1670B	1350B
Selenium		0.47B						0.36B	0.32B								
Silver			0.79B														
Sodium	292B	47.1B	73.7B	181B	171B	174B	177B	172B	81.1B	41.6B	23100	23500	65300	104000	78100	62200	50200
Thallium				0.26B	0.27B	0.39B			0.31B								
Vanadium	4.2B	18.2	30.1	33.3	33.9	38.4	37.3	50.2	37.2	15.3	3.2B	4.0B			4.2B	4.2B	
Zinc	9.4B	28	173	63.9	123	65	61.9	91.2	115	47.4	10.2B	6.7B	10.3B	113	43.6	7.9B	61.5
Cyanide																	

Notes:  
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**Valley Park Site - Baton Rouge, Louisiana**  
**Volatiles & Semi-volatiles**  
**Sample Analyses Summary Table**  
**Numbers FT201 - FT215DL**

Lab Number	Retention Time	FT201	FT202	FT203	FT204	FT205	FT206	FT207	FT208	FT209	FT210	FT210DL	FT210MS	FT210MSD	FT211	FT212	FT213	FT214	FT215	FT215DL
Sample Num	Matrix	SW-1	SW-2	SW-3	SW-4	SW-5	SW-6	SW-7	SW-8	SW-9	S-1	S-1	S-1	S-1	S-2	S-3	S-4	S-5	S-6	S-6
Conc. Units		UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG

<b>VOLATILES</b>											21				8.J	6.J	11.J	33	21	
Acetone									4.BJ											
2-Butanone									9.J											
Chlorobenzene																				
Disulfide, Dimethyl																				

<b>SEMI-VOLATILES</b>																					
Acenaphthene											660	680.DJ	1600	1500				120.J		12000.D	
Acenaphthylene											170.J	170.DJ		41.J				320.J	8000	640.DJ	
Anthracene											960	920.DJ	230.J					320.J			
Benzo(a)anthracene											5700	2900.D		270.J				3400	49000	31000.D	
Benzo(a)anthracene											4300	2800.D	390.J	130.J				1600	18000	27000.D	
Benzo(a)pyrene											6200	3300.D	860	340.J				2400	14000	36000.D	
Benzo(b)fluoranthene											2000	2700.D	550					1700	44000	20000.D	
Benzo(k)fluoranthene											2000	1800.DJ	240.J	78.J				950	13000		
Benzo(g,h,i)perylene											560.B	380.DBJ	390.BJ	350.BJ				65.BJ	46.BJ	5200.B	
benz(2-ethylthio)phthalate		1.J	3.J	2.J		1.J	8.J				220.J		85.J		53.J	130.J					
Butylbenzylphthalate											2200	2800.DJ	290.BJ					96.BJ	15000.B	39000.DJ	
Carbazole																					
Chrysene													2100								
2-Chlorophenol													2500	2800				2700	27000	28000.D	
4-Chloro-3-methylphenol											3100	2400.D		280.J				8200			
Chrysene																		120.J			
Diethylphthalate																					
Dimethylphthalate																					
Di-n-butylphthalate		3.BJ	2.BJ	2.BJ	2.BJ	2.BJ	3.BJ	3.BJ	2.BJ	1.BJ	160.BJ	250.DBJ	58.BJ		96.BJ	59.BJ	53.BJ			1900.DBJ	
Dibenzoluran											480	500.DJ		16.J				170.J	8800	10000.DJ	
Dibenz(a,h)anthracene											1200	690.DJ	150.J							3700	8500.DJ
Di-n-Octylphthalate																		32.J			
Dichlorobenzene																					
1,4-Dichlorobenzene									4.J												
2,4-Dinitrotoluene																					
2,6-Dinitrotoluene																					

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Valley Park Site - Baton Rouge, Louisiana

Volatiles & Semi-volatiles

Sample Analyses Summary Table

Numbers FT201 - FT215DL

Lab Number	Retention Time	FT201	FT202	FT203	FT204	FT205	FT206	FT207	FT208	FT209	FT210	FT210DL	FT210MS	FT210MSD	FT211	FT212	FT213	FT214	FT215	FT215DL
Sample Num	Time	SW-1	SW-2	SW-3	SW-4	SW-5	SW-6	SW-7	SW-8	SW-9	S-1	S-1	S-1	S-1	S-2	S-3	S-4	S-5	S-6	S-6
Matrix		Water	Water	Water	Water	Water	Water	Water	Water	Water	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Conc. Units		UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG

Unknown C10H16O MW=152	8.6								8.J	6.J										
Unknown	8.9					13.J														
Unknown Aromatic MW=142	9.2					12.J														
Unknown Aromatic MW=142	9.3								7.J											
Unknown	9.4																			
Unknown Aromatic MW=130	9.6									5.J										1440.J
Unknown	10.2																			
Unknown	10.4								4.J	4.J										
Unknown Aromatic	10.4		3.J																	
Unknown Aromatic MW=135	10.7																			2400.J
Unknown	10.9											600.DJ								
Unknown	11.1									3.J										
Unknown	11.2								4.J											
Phenol, (1,1-Dimethylethyl)	11.5																			
Naphthalene, 1-Methyl-	11.9								18.J	17.J										
Unknown Aromatic MW=142	11.9																			
Unknown	12.0																			
Naphthalene, 1-Methyl	12.0																			
Naphthalene, 1-Methyl	12.1																			
Unknown	12.3	4.J																		
Unknown	12.4																			
Unknown Halogenated	12.7		6.J																	
1,1'-Biphenyl	13.2		5.J																	
Unknown	13.2																			
Naphthalene, Dimethyl-	13.8																			
Unknown C10H16 MW=136	13.9																			
Unknown	13.9		6.J	3.J																
Unknown Hydrocarbon	13.9	3.J																		
Unknown Hydrocarbon	14.0				3.J															
Unknown Hydrocarbon	14.1																			
Unknown Hydrocarbon	14.2																			
Unknown	14.8																			
Unknown Aromatic	14.9	2.J	3.J																	
Unknown	15.6																			

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Valley Park Site - Baton Rouge, Louisiana

Volatiles & Semi-volatiles

Sample Analyses Summary Table

Numbers FT201 - FT215DL

Lab Number	Retention Time	FT201	FT202	FT203	FT204	FT205	FT206	FT207	FT208	FT209	FT210	FT210DL	FT210MS	FT210MSD	FT211	FT212	FT213	FT214	FT215	FT215DL
Sample Num	Time	SW-1	SW-2	SW-3	SW-4	SW-5	SW-6	SW-7	SW-8	SW-9	S-1	S-1	S-1	S-1	S-2	S-3	S-4	S-5	S-6	S-6
Matrix		Water	Water	Water	Water	Water	Water	Water	Water	Water	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Conc. Units		UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
Unknown	15.6	7.BJ																		
Unknown	15.7								3.BJ											
Phenol, Tetra-methylbutyl	15.8		6.J																	4000.DJ
Unknown	15.8																			
Dibenzofuran, 4-Methyl-	16.5																			
Unknown Aromatic	16.5			3.J																
Unknown Aromatic	16.7					9.J			10.J	11.J										
Unknown Aromatic	17.4								13.J											
Unknown Aromatic	17.5									19.J										
Dibenzofuran	18.1																			
Calfeine	18.8	4.NJ	37.NJ																	
Unknown Aromatic	18.9					4.J														
Unknown Hydrocarbon	18.9		12.J																	
Hexadecanoic Acid	19.8		24.NJ																	
Unknown Adipate	19.0														114.J					
Unknown Aromatic	19.0								5.J	4.J										
Unknown Hydrocarbon	18.0											720.DJ								8600.DJ
Unknown P.A.H. MW-192	19.7											760.DJ								7200.DJ
Unknown P.A.H. MW-192	19.7																			
Unknown P.A.H. MW-192	19.8																			
Hexadecanoic Acid	19.8		24.NJ																	
Unknown	19.9																340.J			
Unknown P.A.H.	20.0											1020.DJ								14000.DJ
Hexadecanoic Acid	20.1																			
Unknown P.A.H. MW-192	20.1																			7200.J
Unknown P.A.H. MW-192	20.2																			7200.J
Unknown P.A.H.	20.2										1420.J									
Unknown Aromatic	20.3																			
Hexadecanoic Acid	20.5																			
Naphthalene, 2-Phenyl-	20.5																			
Naphthalene, 2-Phenyl-	20.7																			
Naphthalene, 2-Phenyl-	20.8																			3600.NJ
Unknown	20.8		20.J																	
Unknown Aromatic	21.2																			3400.J

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Valley Park Site - Baton Rouge, Louisiana

Volatiles & Semi-volatiles

Sample Analyses Summary Table

Numbers FT201 - FT215DL

Lab Number	Retention Time	FT201	FT202	FT203	FT204	FT205	FT206	FT207	FT208	FT209	FT210	FT210DL	FT210MS	FT210MSD	FT211	FT212	FT213	FT214	FT215	FT215DL
Sample Num	Matrix	SW-1	SW-2	SW-3	SW-4	SW-5	SW-6	SW-7	SW-8	SW-9	S-1	S-1	S-1	S-1	S-2	S-3	S-4	S-5	S-6	S-6
Conc. Units		Water	Water	Water	Water	Water	Water	Water	Water	Water	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
		UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL

Unknown Alkane	26.9														1200.J					
Unknown Alkane	27.0														34000.J			2800.J		
Unknown UnresolvedHydrocarbon	27.4																	1740.J		
Unknown Alkane	27.9																			
Unknown P.A.H. MW-252	28.6																	1320.J		
Unknown Alkane	29.0																			
Unknown P.A.H. MW-252	28.1																		1140.J	
Unknown	29.2																			
Unknown P.A.H. MW-252	29.2											1160.DJ								
Unknown	29.3																			
Unknown P.A.H. MW-252	28.7																			
Unknown P.A.H. MW-252	29.8																			
Unknown P.A.H. MW-252	30.2																			
Unknown P.A.H. MW-266	30.2																			
Unknown Alkane	30.2																			
Unknown	30.7																			
Unknown Alkane	30.7																			
Unknown	30.9																			
Unknown Alkane	31.4																			
Unknown Natural Product	31.4																			
Unknown Natural Product	31.5																			
Unknown	32.1																			
Unknown NaturalProduct	32.2																			
Unknown	32.2																			
Unknown	32.2																			
Unknown Alkane	33.3																			
Unknown Natural Product	34.8																			
Unknown P.A.H. MW-278	34.1																			
Unknown	35.0																			
Unknown	35.4																			
Unknown Alkane	35.4																			
Unknown Alkane	35.5																			
Unknown Natural Product	35.6																			
Unknown P.A.H. MW-278	35.6																			

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Valley Park Site - Baton Rouge, Louisiana

Volatiles & Semi-volatiles

Sample Analyses Summary Table

Numbers FT216 - FT233

Lab Number	Retention Time	FT 216	FT 217	FT 218	FT 219	FT 220	FT 221	FT 222	FT 223	FT 224	FT 225	FT 226	FT 227	FT 228	FT 229	FT 230	FT 231	FT 232	FT 233	
Sample Num	Matrix	S-7	SW-10	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	GW-1	GW-2	GW-3	GW-4	GW-5	GW-6	GW-7	
Conc. Units		UG/KG	UG/L	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L
Acetone		11		5. J		5. J		18		30	4. J									
2-Butanone																				
Chlorobenzene		18. J																		
Desulfide, Dimethyl		18. J																		

VOLATILES

Acetophenone																				
Acenaphthylene																				
Anthracene																				
Benzo(a)anthracene																				
Benzo(a)pyrene																				
Benzo(b)fluoranthene																				
Benzo(k)fluoranthene																				
Benzo(g,h,i)perylene																				
bis(2-ethylhexyl)-phthalate																				
Butylbenzylphthalate																				
Carbazole																				
Chrysene																				
Di-n-butylphthalate																				
Di-n-Octylphthalate																				
Dibenzofuran																				
1,4-Dichlorobenzene																				
Diethylphthalate																				
Fluoranthene																				
Fluorene																				
Indeno(1,2,3-cd)pyrene																				
2-Methylnaphthalene																				
Naphthalene																				
Phenanthrene																				
Pyrene																				
Unknown	5.8								920.BJ											14 BJ

SEMI-VOLATILES

Acenaphthene																				
Acenaphthylene																				
Anthracene																				
Benzo(a)anthracene																				
Benzo(a)pyrene																				
Benzo(b)fluoranthene																				
Benzo(k)fluoranthene																				
Benzo(g,h,i)perylene																				
bis(2-ethylhexyl)-phthalate																				
Butylbenzylphthalate																				
Carbazole																				
Chrysene																				
Di-n-butylphthalate																				
Di-n-Octylphthalate																				
Dibenzofuran																				
1,4-Dichlorobenzene																				
Diethylphthalate																				
Fluoranthene																				
Fluorene																				
Indeno(1,2,3-cd)pyrene																				
2-Methylnaphthalene																				
Naphthalene																				
Phenanthrene																				
Pyrene																				
Unknown	5.8								920.BJ											14 BJ

Notes:

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- MSD - Indicates sample was a matrix spike duplicate.

Valley Park Site - Baton Rouge, Louisiana

Volatiles & Semi-volatiles

Sample Analyses Summary Table

Numbers FT216 - FT233

Lab Number	Retention Time	FT 216	FT 217	FT 218	FT 219	FT 220	FT 221	FT 222	FT 223	FT 224	FT 225	FT 226	FT 227	FT 228	FT 229	FT 230	FT 231	FT 232	FT 233	
Sample Num	Matrix	S-7	SW-10	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	GW-1	GW-2	GW-3	GW-4	GW-5	GW-6	GW-7	
Conc. Units		UG/KG	UG/L	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L

Unknown	5.9		27. BJ	900. BJ		1360. BJ		720. BJ		188. BJ	1160. BJ		7. BJ		11. BJ	21. BJ	13. BJ	8. J		
Unknown	6.0	620. BJ																		
Unknown	6.1		3. BJ					700. BJ	660. BJ						4. BJ	4. BJ	3. BJ			
Unknown C10H18 MW=138	6.1	640. BJ		500. BJ		520. BJ	1680. J			200. BJ	400. BJ									
Unknown	6.2																			
Unknown	6.3									110. J	200. J									
Unknown	6.4	220. J																		
2-PROPANOL, 1-(2-METHOXY)-1-M.	6.7																			
2-PROPANOL, 1-(2-METHOXY)-1	6.8																			
Unknown	7.1							2400. J	1140. J											
Unknown C10H18 MW=138	7.1														3. J	3. J				
Unknown	7.2	300. J								980. J	420. J									
Unknown	7.5																			
Unknown	7.6																			
Unknown	7.8				2800. J															
Unknown	7.9	1800. BJ				2600. BJ				1340. BJ	3000. BJ									
Unknown	9.7						420. J													
Unknown	9.8																			
Unknown Aromatic	10.4																			
Unknown Aromatic MW=135	10.7						780. J													
Unknown	11.1	156. J																		
Unknown	12.3																			
Unknown	12.4		2. J																	
Unknown	12.6																			
Unknown Hydrocarbon	13.9						196. J	154. J	194. J											2. J
Unknown MW=220	14.1		3. BJ																	
Unknown Hydrocarbon	14.1								192. BJ											
Unknown Hydrocarbon	14.2				240. BJ			200. J				148. BJ								
Unknown	14.3									114. J										
Unknown Hydrocarbon	14.3			90. BJ																
Unknown MW=220	14.6		6. J																	
Unknown Aromatic	14.9																			
Unknown	15.6																			
Unknown Aromatic	15.6						320. J													8. BJ

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Valley Park Site - Baton Rouge, Louisiana

Volatiles & Semi-volatiles

Sample Analyses Summary Table

Numbers FT216 - FT233

Lab Number	Retention Time	FT 216	FT 217	FT 218	FT 219	FT 220	FT 221	FT 222	FT 223	FT 224	FT 225	FT 226	FT 227	FT 228	FT 229	FT 230	FT 231	FT 232	FT 233	
Sample Num	Matrix	S-7	SW-10	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	GW-1	GW-2	GW-3	GW-4	GW-6	GW-7		
Conc. Units		UG/KG	UG/L	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L

Unknown	15.7		10.8J										3.8J							
Phenol, Tetra-	15.8																			
Unknown Alkane Coeluting W/U	15.9						320. J													
Unknown Hydrocarbon	16.8							178. J	220. J											
Unknown Alkane	17.1							380. J	620. J											
Unknown Alkane	17.2									136. J										
Tetradecanoic Acid	17.8							640. NJ	540. NJ	420. NJ										
Tetradecanoic Acid	17.9																			
Unknown MW-234	17.9																			
Pentadecanoic Acid Coeluting	18.5				240. J															
Pentadecanoic Acid	18.6					220. NJ														
Unknown	18.7																			
Caffeine	18.8																			
Unknown	18.8																			
Unknown Hydrocarbon	18.9																			
Unknown Hydrocarbon	18.9																			
Hexadecanoic Acid	19.8																			
Unknown	19.8																			
Unknown Hydrocarbon	19.9																			
Hexadecanoic Acid	20.0																			
Unknown	20.0																			
Unknown	20.0																			
Hexadecanoic Acid	20.1																			
Hexadecanoic Acid	20.2																			
Hexadecanoic Acid	20.2																			
Unknown Hydrocarbon	20.6																			
Unknown	20.8																			
Unknown	21.1																			
Unknown	21.4																			
Unknown	21.7																			
Unknown	21.8																			
Unknown	22.0																			
Unknown Hydrocarbon	22.0																			
Octadecanoic Acid	22.1																			
Unknown	22.1																			
Octadecanoic Acid	22.2																			

Notes:  
 DL - Indicates sample or extract was reanalyzed at a high dilution factor.  
 MS - Indicates sample was a matrix spike.  
 MSD - Indicates sample was a matrix spike duplicate.

Valley Park Site - Baton Rouge, Louisiana

Volatiles & Semi-volatiles

Sample Analyses Summary Table

Numbers FT216 - FT233

Lab Number	Retention Time	FT 216	FT 217	FT 218	FT 219	FT 220	FT 221	FT 222	FT 223	FT 224	FT 225	FT 226	FT 227	FT 228	FT 229	FT 230	FT 231	FT 232	FT 233		
Sample Num		S-7	SW-10	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	GW-1	GW-2	GW-3	GW-4	GW-6	GW-7			
Matrix		Soil	Water	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Water	Water	Water	Water	Water	Water	Water		
Conc. Units		UG/KG	UG/L	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	

Unknown	22.4						940. J	148. J													
Unknown	23.6						1520. J														
Unknown Aromatic	23.7									260. J											
Unknown	23.7									420. J											
Unknown	23.7																				
Unknown	24.2																				
Unknown	24.3							1700. J													
Unknown Alkane	24.3			188. J																	
Unknown	24.6			186. J																	
Unknown	24.7					88. J															
Unknown Alkane	25.1																				
Unknown Alkane	25.2																				
Unknown	25.3	540. J				220. J															
Unknown Alkane	25.3			440. J																	
Unknown Alkane	26.1																				
Unknown	26.4	136. J																			
Unknown Alkane	26.5																				
Unknown Pthalate	26.7																				
Unknown Alkane	26.8																				
Unknown Alkane	26.9			340. J	620. J																
Unknown Alkane	27.0					220. J	1040. J														
Unknown	27.1	174. J																			
Unknown Alkane	27.2																				
Unknown	27.5				600. J																
Unknown Alkane	27.8				240. J																
Unknown Alkane	28.6																				
Unknown Alkane	28.8				1620. J																
Unknown Alkane	28.9																				
Unknown Alkane	28.9																				
Unknown Alkane	29.0					520. J															
Unknown Alkane	29.9																				
Unknown Alkane	31.4																				
Unknown Alkane	31.5				1940. J																
Unknown Natural Product	31.5																				
Unknown	31.6	146. J		196. J		760. J															

Notes:  
 DL - Indicates sample or extract was reanalyzed at a high dilution factor.  
 MS - Indicates sample was a matrix spike.  
 MSD - Indicates sample was a matrix spike duplicate.

Valley Park Site - Baton Rouge, Louisiana

Volatiles & Semi-volatiles

Sample Analyses Summary Table

Numbers FT216 - FT233

Lab Number	Retention Time	FT 216	FT 217	FT 218	FT 219	FT 220	FT 221	FT 222	FT 223	FT 224	FT 225	FT 226	FT 227	FT 228	FT 229	FT 230	FT 231	FT 232	FT 233	
Sample Num	Matrix	S-7	SW-10	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	GW-1	GW-2	GW-3	GW-4	GW-5	GW-6	GW-7	
Conc. Units		UG/KG	UGL	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UGL	UGL	UGL	UGL	UGL	UGL	UGL	UGL

Unknown Hydrocarbon	31.6				740. J															
Unknown Alkane	31.7						440. J													
Unknown PAH	32.1	136. J																		
Unknown	32.2																			
Unknown Natural Product	32.2																			
Unknown	32.6																			
Unknown Natural Product	32.9	160. J				300. J			240. J											
Unknown	33.5	98. J																		
Unknown Alkane	34.6								1200. J											
Unknown Natural Product	34.7				1900. J															
Unknown Natural Product	34.8																			
Unknown Natural Product	34.9			240. J																
Unknown Natural Product	35.0					540. J														
Unknown	35.1																			
Unknown Alkane	35.2				2000. J															
Unknown Alkane	35.4	1760. J		340. J																
Unknown	35.4																			
Unknown	35.5																			
Unknown	35.6			150. J						1140. J										
Unknown Natural Product	35.8				2000. J															

Notes:  
 DL - indicates sample or extract was reanalyzed at a high dilution factor.  
 MS - indicates sample was a matrix spike.  
 MSD - indicates sample was a matrix spike duplicate.



## INORGANIC TARGET ANALYTE LIST (TAL)

Analyte	Contract Required Detection Limit (1,2) (ug/L)
Aluminum	200
Antimony	60
Arsenic	10
Barium	200
Beryllium	5
Cadmium	5
Calcium	5000
Chromium	10
Cobalt	50
Copper	25
Iron	100
Lead	3
Magnesium	5000
Manganese	15
Mercury	0.2
Nickel	40
Potassium	5000
Selenium	5
Silver	10
Sodium	5000
Thallium	10
Vanadium	50
Zinc	20
Cyanide	10

- (1) Subject to the restrictions specified in the first page of Part G, Section IV of Exhibit D (Alternate Methods - Catastrophic Failure) any analytical method specified in SOW Exhibit D may be utilized as long as the documented instrument or method detection limits meet the Contract Required Detection Limit (CRDL) requirements. Higher detection limits may only be used in the following circumstance:

If the sample concentration exceeds five times the detection limit of the instrument or method in use, the value may be reported even though the instrument or method detection limit may not equal the Contract Required Detection Limit. This is illustrated in the example below:

For lead:

Method in use - ICP

Instrument Detection Limit (IDL) - 40

Sample concentration - 220

Contract Required Detection Limit (CRDL) - 3

## TARGET COMPOUND LIST (TCL) AND CONTRACT REQUIRED QUANTITATION LIMITS (CRQL)

Volatiles	CAS Number	Quantitation Limits*			On Column (ng)
		Water ug/L	Low Soil ug/Kg	Med. Soil ug/Kg	
1. Chloromethane	74-87-3	10	10	1200	(50)
2. Bromomethane	74-83-9	10	10	1200	(50)
3. Vinyl Chloride	75-01-4	10	10	1200	(50)
4. Chloroethane	75-00-3	10	10	1200	(50)
5. Methylene Chloride	75-09-2	10	10	1200	(50)
6. Acetone	67-64-1	10	10	1200	(50)
7. Carbon Disulfide	75-15-0	10	10	1200	(50)
8. 1,1-Dichloroethane	75-35-4	10	10	1200	(50)
9. 1,1-Dichloroethane	75-34-3	10	10	1200	(50)
10. 1,2-Dichloroethane (total)	540-59-0	10	10	1200	(50)
11. Chloroform	67-66-3	10	10	1200	(50)
12. 1,2-Dichloroethane	107-06-2	10	10	1200	(50)
13. 2-Butanone	78-93-3	10	10	1200	(50)
14. 1,1,1-Trichloroethane	71-55-6	10	10	1200	(50)
15. Carbon Tetrachloride	56-23-5	10	10	1200	(50)
16. Bromodichloromethane	75-27-4	10	10	1200	(50)
17. 1,2-Dichloropropane	78-87-5	10	10	1200	(50)
18. cis-1,3-Dichloropropene	10061-01-5	10	10	1200	(50)
19. Trichloroethene	79-01-6	10	10	1200	(50)
20. Dibromochloromethane	124-48-1	10	10	1200	(50)
21. 1,1,2-Trichloroethane	79-00-5	10	10	1200	(50)
22. Benzene	71-43-2	10	10	1200	(50)
23. trans-1,3-Dichloropropene	10061-02-6	10	10	1200	(50)
24. Bromoform	75-25-2	10	10	1200	(50)
25. 4-Methyl-2-pentanone	108-10-1	10	10	1200	(50)
26. 2-Hexanone	591-78-6	10	10	1200	(50)
27. Tetrachloroethene	127-18-4	10	10	1200	(50)
28. Toluene	108-88-3	10	10	1200	(50)
29. 1,1,2,2-Tetrachloroethane	79-34-5	10	10	1200	(50)
30. Chlorobenzene	108-90-7	10	10	1200	(50)
31. Ethyl Benzene	100-41-4	10	10	1200	(50)
32. Styrene	100-42-5	10	10	1200	(50)
33. Xylenes (Total)	1330-20-7	10	10	1200	(50)

\* Quantitation limits listed for soil/sediment are based on wet weight. The quantitation limits calculated by the laboratory for soil/sediment, calculated on dry weight basis as required by the contract, will be higher.

## TARGET COMPOUND LIST (TCL) AND CONTRACT REQUIRED QUANTITATION LIMITS (CRQL)

Semivolatiles	CAS Number	Quantitation Limits*			On Column (ng)
		Water ug/L	Low Soil ug/Kg	Med. Soil ug/Kg	
34. Phenol	108-95-2	10	330	10000	(20)
35. bis(2-Chloroethyl) ether	111-44-4	10	330	10000	(20)
36. 2-Chlorophenol	95-57-8	10	330	10000	(20)
37. 1,3-Dichlorobenzene	541-73-1	10	330	10000	(20)
38. 1,4-Dichlorobenzene	106-46-7	10	330	10000	(20)
39. 1,2-Dichlorobenzene	95-50-1	10	330	10000	(20)
40. 2-Methylphenol	95-48-7	10	330	10000	(20)
41. 2,2'-oxybis (1-Chloropropane) <sup>#</sup>	108-60-1	10	330	10000	(20)
42. 4-Methylphenol	106-44-5	10	330	10000	(20)
43. N-Nitroso-di-n- propylamine	621-64-7	10	330	10000	(20)
44. Hexachloroethane	67-72-1	10	330	10000	(20)
45. Nitrobenzene	98-95-3	10	330	10000	(20)
46. Isophorone	78-59-1	10	330	10000	(20)
47. 2-Nitrophenol	88-75-5	10	330	10000	(20)
48. 2,4-Dimethylphenol	105-67-9	10	330	10000	(20)
49. bis(2-Chloroethoxy) methane	111-91-1	10	330	10000	(20)
50. 2,4-Dichlorophenol	120-83-2	10	330	10000	(20)
51. 1,2,4-Trichlorobenzene	120-82-1	10	330	10000	(20)
52. Naphthalene	91-20-3	10	330	10000	(20)
53. 4-Chloroaniline	106-47-8	10	330	10000	(20)
54. Hexachlorobutadiene	87-68-3	10	330	10000	(20)
55. 4-Chloro-3-methylphenol	59-50-7	10	330	10000	(20)
56. 2-Methylnaphthalene	91-57-6	10	330	10000	(20)
57. Hexachlorocyclopentadiene	77-47-4	10	330	10000	(20)
58. 2,4,6-Trichlorophenol	88-06-2	10	330	10000	(20)
59. 2,4,5-Trichlorophenol	95-95-4	25	800	25000	(50)
60. 2-Chloronaphthalene	91-58-7	10	330	10000	(20)
61. 2-Nitroaniline	88-74-4	25	800	25000	(50)
62. Dimethylphthalate	131-11-3	10	330	10000	(20)
63. Acenaphthylene	208-96-8	10	330	10000	(20)
64. 2,6-Dinitrotoluene	606-20-2	10	330	10000	(20)
65. 3-Nitroaniline	99-09-2	25	800	25000	(50)
66. Acenaphthene	83-32-9	10	330	10000	(20)
67. 2,4-Dinitrophenol	51-28-5	25	800	25000	(50)
68. 4-Nitrophenol	100-02-7	25	800	25000	(50)

\* Previously known by the name bis(2-Chloroisopropyl) ether

Semivolatiles	CAS Number	Quantitation Limits*			On Column (ng)
		Water ug/L	Low	Med.	
			Soil ug/Kg	Soil ug/Kg	
69. Dibenzofuran	132-64-9	10	330	10000	(20)
70. 2,4-Dinitrotoluene	121-14-2	10	330	10000	(20)
71. Diethylphthalate	84-66-2	10	330	10000	(20)
72. 4-Chlorophenyl-phenyl ether	7005-72-3	10	330	10000	(20)
73. Fluorene	86-73-7	10	330	10000	(20)
74. 4-Nitroaniline	100-01-6	25	800	25000	(50)
75. 4,6-Dinitro-2-methylphenol	534-52-1	25	800	25000	(50)
76. N-nitrosodiphenylamine	86-30-6	10	330	10000	(20)
77. 4-Bromophenyl-phenyl ether	101-55-3	10	330	10000	(20)
78. Hexachlorobenzene	118-74-1	10	330	10000	(20)
79. Pentachlorophenol	87-86-5	25	800	25000	(50)
80. Phenanthrene	85-01-8	10	330	10000	(20)
81. Anthracene	120-12-7	10	330	10000	(20)
82. Carbazole	86-74-8	10	330	10000	(20)
83. Di-n-butylphthalate	84-74-2	10	330	10000	(20)
84. Fluoranthene	206-44-0	10	330	10000	(20)
85. Pyrene	129-00-0	10	330	10000	(20)
86. Butylbenzylphthalate	85-68-7	10	330	10000	(20)
87. 3,3'-Dichlorobenzidine	91-94-1	10	330	10000	(20)
88. Benzo(a)anthracene	56-55-3	10	330	10000	(20)
89. Chrysene	218-01-9	10	330	10000	(20)
90. bis(2-Ethylhexyl)phthalate	117-81-7	10	330	10000	(20)
91. Di-n-octylphthalate	117-84-0	10	330	10000	(20)
92. Benzo(b)fluoranthene	205-99-2	10	330	10000	(20)
93. Benzo(k)fluoranthene	207-08-9	10	330	10000	(20)
94. Benzo(a)pyrene	50-32-8	10	330	10000	(20)
95. Indeno(1,2,3-cd)pyrene	193-39-5	10	330	10000	(20)
96. Dibenz(a,h)anthracene	53-70-3	10	330	10000	(20)
97. Benzo(g,h,i)perylene	191-24-2	10	330	10000	(20)

\* Quantitation limits listed for soil/sediment are based on wet weight. The quantitation limits calculated by the laboratory for soil/sediment, calculated on dry weight basis as required by the contract, will be higher.

## TARGET COMPOUND LIST (TCL) AND CONTRACT REQUIRED QUANTITATION LIMITS (CROL)

Pesticides/Aroclors	CAS Number	Quantitation Limits*		
		Water ug/L	Soil ug/Kg	On Column (ug)
98. alpha-BHC	319-84-6	0.05	1.7	5
99. beta-BHC	319-85-7	0.05	1.7	5
100. delta-BHC	319-86-8	0.05	1.7	5
101. gamma-BHC (Lindane)	58-89-9	0.05	1.7	5
102. Heptachlor	76-44-8	0.05	1.7	5
103. Aldrin	309-00-2	0.05	1.7	5
104. Heptachlor epoxide	1024-57-3	0.05	1.7	5
105. Endosulfan I	959-98-8	0.05	1.7	5
106. Dieldrin	60-57-1	0.10	3.3	10
107. 4,4'-DDE	72-55-9	0.10	3.3	10
108. Endrin	72-20-8	0.10	3.3	10
109. Endosulfan II	33213-65-9	0.10	3.3	10
110. 4,4'-DDD	72-54-8	0.10	3.3	10
111. Endosulfan sulfate	1031-07-8	0.10	3.3	10
112. 4,4'-DDT	50-29-3	0.10	3.3	10
113. Methoxychlor	72-43-5	0.50	17.0	50
114. Endrin ketone	53494-70-5	0.10	3.3	10
115. Endrin aldehyde	7421-36-3	0.10	3.3	10
116. alpha-Chlordane	5103-71-9	0.05	1.7	5
117. gamma-Chlordane	5103-74-2	0.05	1.7	5
118. Toxaphene	8001-35-2	5.0	170.0	500
119. Aroclor-1016	12674-11-2	1.0	33.0	100
120. Aroclor-1221	11104-28-2	2.0	67.0	200
121. Aroclor-1232	11141-16-5	1.0	33.0	100
122. Aroclor-1242	53469-21-9	1.0	33.0	100
123. Aroclor-1248	12672-29-6	1.0	33.0	100
124. Aroclor-1254	11097-69-1	1.0	33.0	100
125. Aroclor-1260	11096-82-5	1.0	33.0	100

\* Quantitation limits listed for soil/sediment are based on wet weight. The quantitation limits calculated by the laboratory for soil/sediment, calculated on dry weight basis as required by the contract, will be higher.

There is no differentiation between the preparation of low and medium soil samples in this method for the analysis of Pesticides/Aroclors.

## RAS ORGANIC DATA FLAGS

Under the column labeled "Q" for qualifier, flag each result with the specific Data Reporting Qualifiers listed below. The Contractor is encouraged to use additional flags or footnotes. The definition of such flags must be explicit and must be included in the SDG Narrative.

For reporting results to the USEPA, the following contract specific qualifiers are to be used. The seven qualifiers defined below are NOT subject to modification by the Laboratory. Up to five qualifiers may be reported on Form I for each compound.

The seven EPA-defined qualifiers to be used are as follows:

- U - Indicates compound was analyzed for but not detected. The sample quantitation limit must be corrected for dilution and for percent moisture. For example, 10 U for phenol in water if the sample final volume is the protocol-specified final volume. If a 1 to 10 dilution of extract is necessary, the reported limit is 100 U. For a soil sample, the value must also be

(2)

adjusted for percent moisture. For example, if the sample had 24% moisture and a 1 to 10 dilution factor, the sample quantitation limit for phenol (330 U) would be corrected to

$$\frac{(330 \text{ U})}{D} \times df \quad \text{where } D = \frac{100 - \% \text{ moisture}}{100}$$

and df = dilution factor

For example, at 24% moisture,  $D = \frac{100-24}{100} = 0.76$

$$\frac{(330 \text{ U})}{.76} \times 10 = 4300 \text{ U} \quad \text{rounded to the appropriate number of significant figures}$$

.76

For soil samples subjected to GPC clean-up procedures, the extract must be concentrated to 0.5 mL, and the sensitivity of the analysis is not compromised by the cleanup procedures. Therefore, the CROL values in Exhibit C will apply to all samples, regardless of cleanup. However, if a sample extract cannot be concentrated to the protocol-specified volume (see Exhibit C), this fact must be accounted for in reporting the sample quantitation limit.

- J - Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed, or when the mass spectral data indicate the presence of a compound that meets the identification criteria but the result is less than the sample quantitation limit but greater than zero. For example, if the sample quantitation limit is 10 ug/L, but a concentration of 3 ug/L is calculated, report it as 3J. The sample quantitation limit must be adjusted for dilution as discussed for the U flag.
- N - Indicates presumptive evidence of a compound. This flag is only used for tentatively identified compounds, where the identification is based on a mass spectral library search. It is applied to all TIC results.
- P - This flag is used for a pesticide/Aroclor target analyte when there is greater than 25% difference for detected concentrations between the two GC columns (see Form I) The lower of the two values is reported on Form I and flagged with an "P".
- C - This flag applies to pesticide results where the identification has been confirmed by GC/MS. If GC/MS confirmation was attempted but was unsuccessful, do not apply this flag, instead use a laboratory-defined flag, discussed below.

- B - This flag is used when the analyte is found in the associated blank as well as in the sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action. This flag must be used for a TIC as well as for a positively identified target compound.
- E - This flag identifies compounds whose concentrations exceed the calibration range of the GC/MS instrument for that specific analysis. If one or more compounds have a response greater than full scale, except as noted in Exhibit D, the sample or extract must be diluted and re-analyzed according to the specifications in Exhibit D. All such compounds with a response greater than full scale should have the concentration flagged with an "E" on the Form I for the original analysis. If the dilution of the extract causes any compounds identified in the first analysis to be below the calibration range in the second analysis, then the results of both analyses shall be reported on separate copies of Form I. The Form I for the diluted sample shall have the "DL" suffix appended to the sample number. NOTE: For total xylenes, where three isomers are quantified as two peaks, the calibration range of each peak should be considered separately, e.g., a diluted analysis is not required for total xylenes unless the concentration of either peak separately exceeds 200 ug/L.
- D - This flag identifies all compounds identified in an analysis at a secondary dilution factor. If a sample or extract is re-analyzed at a higher dilution factor, as in the "E" flag above, the "DL" suffix is appended to the sample number on the Form I for the diluted sample, and all concentration values reported on that Form I are flagged with the "D" flag. This flag alerts data users that any discrepancies between the concentrations reported may be due to dilution of the sample or extract.
- A - This flag indicates that a TIC is a suspected aldol-condensation product.
- X - Other specific flags may be required to properly define the results. If used, they must be fully described, and such description attached to the Sample Data Summary Package and the SDG Narrative. Begin by using "X". If more than one flag is required, use "Y" and "Z" as needed. If more than five qualifiers are required for a sample result, use the "X" flag to combine several flags, as needed. For instance, the "X" flag might combine the "A", "B", and "D" flags for some sample. The laboratory-defined flags are limited to the letters "X", "Y", and "Z".

The combination of flags "BU" or "UB" is expressly prohibited. Blank contaminants are flagged "B" only when they are detected in the sample.



## RAS INORGANIC DATA FLAGS

Under the column labeled "Concentration", enter for each analyte either the value of the result (if the concentration is greater than or equal to the Instrument Detection Limit) or the Instrument Detection Limit for the analyte corrected for any dilutions (if the concentration is less than the Instrument Detection Limit).

Under the columns labeled "C", "Q", and "M", enter result qualifiers as identified below. If additional qualifiers are used, their explicit definitions must be included on the Cover Page in the Comments section.

FORM I-IN includes fields for three types of result qualifiers. These qualifiers must be completed as follows:

- o C (Concentration) qualifier -- Enter "3" if the reported value was obtained from a reading that was less than the Contract Required Detection Limit (CRDL) but greater than or equal to the Instrument Detection Limit (IDL). If the analyte was analyzed for but not detected, a "U" must be entered.
- o Q qualifier -- Specified entries and their meanings are as follows:
  - E - The reported value is estimated because of the presence of interference. An explanatory note must be included under Comments on the Cover Page (if the problem applies to all samples) or on the specific FORM I-IN (if it is an isolated problem).
  - M - Duplicate injection precision not met.
  - N - Spiked sample recovery not within control limits.
  - S - The reported value was determined by the Method of Standard Additions (MSA).
  - U - Post-digestion spike for Furnace AA analysis is out of control limits (85-115%), while sample absorbance is less than 50% of spike absorbance. (See Exhibit E.)
  - \* - Duplicate analysis not within control limits.
  - + - Correlation coefficient for the MSA is less than 0.995.

Entering "S", "U", or "+" is mutually exclusive. No combination of these qualifiers can appear in the same field for an analyte.

- o M (Method) qualifier -- Enter:
  - "P" for ICP
  - "A" for Flame AA
  - "F" for Furnace AA
  - "PM" for ICP when Microwave Digestion is used
  - "AM" for flame AA when Microwave Digestion is used
  - "FM" for Furnace AA when Microwave Digestion is used
  - "CV" for Manual Cold Vapor AA
  - "AV" for Automated Cold Vapor AA
  - "CA" for Midi-Distillation spectrophotometric.
  - "AS" for Semi-Automated Spectrophotometric
  - "C" for Manual Spectrophotometric
  - "T" for Titrimetric
  - " " where no data has been entered.
  - "NR" if the analyte is not required to be analyzed.

## ORGANIC HIGH CONCENTRATION DATA FLAGS

Under the column labeled "Q" for qualifier, flag each result with the specific Data Reporting Qualifiers listed below. The Contractor is encouraged to use additional flags or footnotes. The definition of such flags must be explicit and must be included in the Case Narrative.

For reporting results to the USEPA, the following contract specific qualifiers are to be used. The eight qualifiers defined below are not subject to modification by the Laboratory. Up to five qualifiers may be reported on Form I for each compound.

The eight EPA-defined qualifiers to be used are as follows:

- U - Indicates compound was analyzed for but not detected. The sample quantitation limit must be corrected for dilution. For example, 20 U for phenol if the sample final volume is the protocol-specified final volume. If a 1 to 10 dilution of extract is necessary, the reported limit is 200 U.
- J - Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed, or when the mass spectral or GC/EC data indicate the presence of a compound that meets the identification criteria but the result is less than the sample quantitation limit but greater than zero. For example, if the sample quantitation limit is 10 mg/Kg, but a concentration of 3 mg/Kg is calculated, report it as J. The sample quantitation limit must be adjusted for dilution as discussed for the U flag.
- B - This flag is used when the analyte is found in the associated blank as well as in the sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action. This flag must be used for a TIC as well as for a positively identified TIL compound.
- E - This flag identifies compounds whose concentrations exceed the calibration range of the GC/MS instrument for that specific analysis. This flag will not apply to Aroclors analyzed by GC/EC methods. If one or more compounds have a response greater than full scale, the extract must be diluted and re-analyzed according to the specifications in Exhibit D. All such compounds with a response greater than full scale should have the concentration flagged with an "E" on the Form I for the original analysis. If the dilution of the extract causes any compounds identified in the first analysis to be below the calibration range in the second analysis, then the results of both analyses shall be reported on separate Forms I. The Form I for the diluted sample shall have the "DL" suffix appended to the sample number.
- D - This flag identifies all compounds identified in an analysis at a secondary dilution factor. If a sample or extract is re-analyzed at a higher dilution factor, as in the "E" flag above, the "DL" suffix is appended to the sample number on the Form I for the diluted sample, and all concentration values reported on that Form I are flagged with the "D" flag.
- A - This flag indicates that a TIC is a suspected aldol-condensation product.

- N - This flag identifies Aroclor or Toxaphene compounds where one or more of the peaks used for quantitation are more than two times the width of the corresponding peaks in the highest concentration calibration standard. It indicates an uncertainty in the quantitation for the compound other than those discussed under the "J" flag.
- X - Other specific flags and footnotes may be required to properly define the results. In order to limit the number of laboratory-defined flags and not use such flags as may be part of the Agency's data review processes, the laboratory-defined flags are restricted to the three letters "X", "Y", and "Z". If used, they must be fully described and such description attached to the Sample Data Summary Package and the Case Narrative. If more than one is required, use "Y" and "Z", as needed. If more than five qualifiers are required for a sample result, use the "X" flag to combine several flags, as needed. For instance, the "X" flag might combine the "A", "B", and "D" flags for some samples.

The combination of flags "BU" or "UB" is expressly prohibited. Blank contaminants are flagged "B" only when they are also detected in the sample.

- If analyses at two different dilution factors are required (see Exhibit D), follow the data reporting instructions given in Exhibit D and with the "D" and "E" flags above.

John H.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

September 9, 1992

Mr. Tim B. Knight  
Program Manager  
Inactive and Abandoned Sites Division  
Office of Legal Affairs and Enforcement  
Louisiana Department of Environmental Quality  
Post Office Box 82282  
Baton Rouge, Louisiana 70884-2282

Dear Mr. Knight:

The Environmental Protection Agency has reviewed and accepted the August 18, 1992, revised Valley Park School, Screening Site Inspection (SSI) report, prepared by the Louisiana Department of Environmental Quality, under the Multi-Site Cooperative Agreement. Enclosed for your information and files, is a copy of the Superfund Site Strategy Recommendation (SSSR) for this site:

<u>Site Name</u>	<u>EPA I.D.</u>	<u>Site Recommendation</u>
Valley Park School	LAD985170273	PreScore

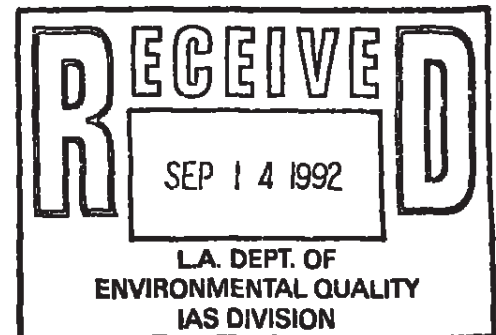
Should you have any questions, please contact me or have your staff contact John L. Jones at (214) 655-6740.

Sincerely,

*Eddie A. Sierra*

Eddie A. Sierra, Chief  
Superfund Site Assessment Section (6H-MA)

Enclosure



LOG # 9-14-92-90

Superfund Site Strategy Recommendation

Region 6

Site Name: Valley Park School Site Number: LAD985170273

Alias Site Name(s): Valley Park Landfill

Address: 4510 Bawell Street

City/County or Parish/State/Zip: Baton Rouge/E. Baton Rouge/70808

Recommendation:

- 1. No further remedial action planned under Superfund.
- 2. Further pre-remedial investigative action needed under Superfund:

PA \_\_\_\_\_ Priority: High \_\_\_\_\_  
 SSI \_\_\_\_\_ Low X  
 LSI \_\_\_\_\_  
 Other Prescore \_\_\_\_\_  
 To be performed by ARCS Contractor

- 3. Action may be appropriate under other authority:

NPDES \_\_\_\_\_ SPCC \_\_\_\_\_ 404 \_\_\_\_\_ TSCA \_\_\_\_\_  
 UIC \_\_\_\_\_ SMCRA \_\_\_\_\_ STATE \_\_\_\_\_ RCRA \_\_\_\_\_  
 OTHER \_\_\_\_\_

**Discussion:** A Screening Site Inspection (SSI) conducted by the Louisiana Department of Environmental Quality (LDEQ) on the Valley Park School Site was reviewed. This site was operated as a sanitary landfill from the 1940's to 1963; an estimated six to eight foot deep lift of garbage/fill material was covered by a two foot clay cap. There are no other containment structures at the site and leachate flows out of four locations on the east side of the site and into the adjacent ditch. Construction of buildings at the facility was completed in 1968 and it now serves as an administrative, testing, and adult education center. Sample analytical results from the SSI indicated: observed releases of acetone, PCBs, pesticides and metals to the soil and surface water sediment. The soil pathway is the primary pathway of concern considering the high usage and the location of the administrative building and the recreational facilities on-site. A PreScore is recommended using the information from the SSI to determine if this site would score high enough using the revised HRS to be a potential candidate for the National Priority List.

Copies to (please list) ATSDR 6W-S 6E-E 6T-P 6H-PA State

Recommended By: John L. Jones *John L. Jones* Date: September 4, 1992 *9/8/92*

Approved By: Betty Tillman *Betty Tillman* Date: 9/9/92

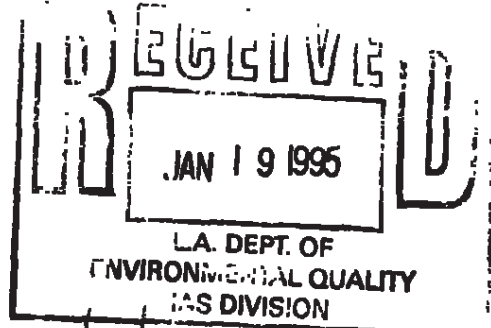


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

January 18, 1995

Mr. Tim Knight, Administrator  
Inactive and Abandoned Sites Division  
Louisiana Department of Environmental  
Quality  
P.O. Box 82282  
Baton Rouge, LA 70884-2282



Dear Mr. Knight:

LOG # 1/20/95 217

Enclosed for your information and files is a copy of the Superfund Site Strategy Recommendation (SSSR) and an associated report for each of the following sites:

<u>Site Name</u>	<u>EPA I.D.</u>	<u>Recommendation</u>
Allied Chemical Corporation	LAD001829589	NFRAP
AT&T Consumer Products	LAD001829689	NFRAP
BWS-Basile	LAD980750764	NFRAP
Central Wood Preserving, Inc.	LAD008187940	SI
Manville Forest Products Corp.	LAD008050940	NFRAP
Roy Young Yard	LAD008198483	NFRAP
Sam Carline Site	LAD980501522	NFRAP
<u>Valley Park School</u>	LAD985170273	NFRAP

Should you have any questions, please contact me at (214) 665-6740.

Sincerely yours,

*for*

*John Jones*

Eddie Sierra, Chief  
Site Assessment Section (6H-MA)

Enclosures (8)



Recycled/Recyclable  
Printed with Soy/Canola ink on paper that  
contains at least 50% recycled fiber



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
SUPERFUND SITE STRATEGY RECOMMENDATION - REGION 06**



Site Name: Valley Park School

CERCLIS ID#: LAD985170273

Address: 4510 Bawell Street

City/County or Parish/State/Zip Code: Baton Rouge/East Baton Rouge/LA

Report Type, Date, and Author: SIP, January, 1995

**RECOMMENDATION**

<input checked="" type="checkbox"/> 1. No Further Remedial Action Planned (NFRAP)	<input type="checkbox"/> 2. Further Investigation Needed Under Superfund
	<input type="checkbox"/> PA <input type="checkbox"/> HRS                      Priority: <input type="checkbox"/> High
	<input type="checkbox"/> SI <input type="checkbox"/> RA <input type="checkbox"/> Low
	<input type="checkbox"/> ESI <input type="checkbox"/> RI/FS
	<input type="checkbox"/> Other:
	To be performed by:
<input type="checkbox"/> 3. Action Deferred to:	
<input type="checkbox"/> RCRA <input type="checkbox"/> NRC	

**NOTIFY AUTHORITY:**

<input type="checkbox"/> Removal	<input type="checkbox"/> RCRA	<input type="checkbox"/> TSCA	<input type="checkbox"/> CAA	<input type="checkbox"/> SMCRA
<input type="checkbox"/> Remedial	<input type="checkbox"/> State	<input type="checkbox"/> NPDES	<input type="checkbox"/> NRC	<input type="checkbox"/> Resource Trustee:
<input type="checkbox"/> CERCLA Enforcement	<input type="checkbox"/> Federal Facility	<input type="checkbox"/> UIC	<input type="checkbox"/> SPCC	<input type="checkbox"/> Other:
SEND REPORT COPIES TO:	<input checked="" type="checkbox"/> 6E-E	<input checked="" type="checkbox"/> 6W-SP	<input checked="" type="checkbox"/> ATSDR	<input checked="" type="checkbox"/> State Agency
				<input type="checkbox"/> Other

**DISCUSSION:** The Site Inspection Prioritization (SIP) report for this site was reviewed. This site is a school that was built on the location of the Valley Park landfill. The landfill served the parish from 1940 to 1963. The landfill is covered with a 2 foot clay cap. There is no information available to indicate that the landfill accepted hazardous waste.

Soil samples collected from the soils at the site have shown the presence of barium at 332 parts per million (ppm) and benzo(j,k)fluorene at 0.390 ppm. According to a reference paper "Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States" produced by the U.S Geological Survey, naturally occurring barium soil concentrations in the Baton Rouge area range from 300 to 700 ppm. Benzo(j,k)fluorene a typical constituent of asphalt was present in the soil sample adjacent to the I-10 right of way, and cannot be solely attributable to the site. Similarly, the benzo(b)fluoranthene found in the surface pathway cannot be attributed solely to the site, because other urban runoff enters the surface water drainage pathway from other sources.

Wells to the south of the site have shown elevated concentrations of barium in the ground water, but the barium cannot be attributed exclusively to the landfill since the East Baton Rouge fault runs east to west 300 feet north of the site. The East Baton Rouge fault is a geological formation that runs east to west approximately 300 feet north of the site. This fault has historically caused salt water intrusion into the deeper sands of the fault. In fact due to this salt water intrusion there are no public supply wells located downgradient of the site.

Based on the results of the SIP report, this site is not a potential candidate for inclusion on the National Priorities List of Superfund sites. The site will be returned to the Louisiana Department of Environmental Quality for any further action, if appropriate, under state regulations.

*[Handwritten signature and date]*

**APPROVALS:**

Report Reviewed by: John L. Jones

Signature: [Signature]

Date: 01/09/95

Disposition Recommended by: Eddie A. Sierra  
(Section Chief)

Signature: Eddie A. Sierra

Date: 01/09/95

Disposition Approved by: Betty Williamson *for*  
(Branch Chief)

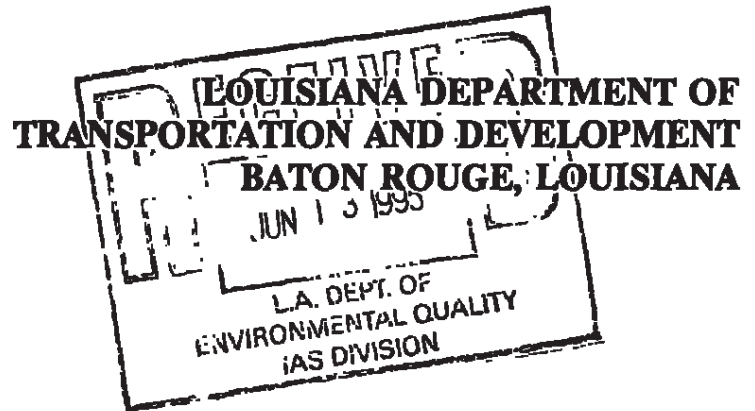
Signature: Carlene L Chamber

Date: 1/9/95



# FINAL REPORT

## INTERSTATE I-10 RIGHT OF WAY SUBSURFACE INVESTIGATION REPORT



LOG # 6/13/95 #131

Prepared for  
Gulf Engineers and Consultants, Inc.  
Baton Rouge, Louisiana

April 1995

WCC File 94B491

Woodward-Clyde 

Woodward-Clyde Consultants  
2822 O'Neal Lane (70816)  
P.O. Box 66317 (70896)  
Baton Rouge, Louisiana

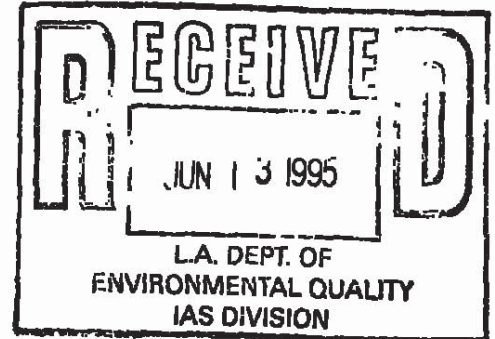


Vally Arch

Verdi Adam, PE  
President

June 13, 1995

Mr. Tim B. Knight, Administrator  
Louisiana Department of Environmental Quality  
Office of Legal Affairs and Enforcement  
Inactive and Abandoned Sites Division  
P. O. Box 82282  
Baton Rouge, Louisiana 70884-2282



Re: State Project No. 700-30-0259  
Acadian Thruway - Jct. I-12  
Route I-10  
East Baton Rouge Parish  
GEC Project No. 50800131

LOG # 6/13/95 131

Dear Mr. Knight:

We hereby transmit two (2) copies of the Final Report *Interstate I-10 Right of Way Subsurface Investigation Report*, April 1995, for your information and files.

Should you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,

Philip K. Meyers, P. E.  
Vice President

Enclosures

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Appendix B	Laboratory Report and Chain-of-Custody Forms

**INTRODUCTION**

---

Woodward-Clyde Consultants (WCC) was retained to conduct an assessment for the widening of Interstate 10 (I-10) between the College Drive and Acadian Thruway exits. The Louisiana Department of Transportation and Development (LDOTD) is planning to widen I-10 along a corridor from the intersection I-10 and I-12 (I-10/I-12 split) to the Acadian Thruway. The location of the area of this assessment is shown in Figure 1. An aerial photograph of the area taken in 1990 is included as Figure 2. The widening will involve partial excavation, removal, stabilization, and recapping of a closed municipal solid waste landfill on the north side of the west bound lanes of I-10 between the College Drive and Acadian Thruway exits. Figure 3 shows the existing lanes and proposed widening. The purpose of this assessment was to characterize the subsurface in the area to be widened. The assessment was conducted in accordance with a January, 1995 workplan prepared by WCC for this project, "I-10 Right of Way Subsurface Investigation Workplan" (workplan).

**BACKGROUND**

---

LDOTD is planning to widen I-10 from the I-10/I-12 split to the Acadian Thruway. This project will impact a closed municipal landfill located on the northern edge of the I-10 right of way between College Drive and Acadian Thruway. The landfill was operated by the city of Baton Rouge for municipal solid waste disposal from approximately 1958 to 1962. It is believed that the landfill was closed by placing a two-foot thick clay cap over the entire disposal site.

In the LDOTD widening project, the west bound section of I-10 will be widened by approximately 12 feet. In addition, the ditch just north of the interstate shoulder will be moved and resloped. As a result, construction activities will impact what is believed to be the southern edge of the closed landfill. The existing features and the proposed widening of I-10 in relation to the closed landfill are shown in Figure 3. This figure was developed from drawings and sections provided by LDOTD and their consultant, Gulf Engineers and Consultants (GEC) and a site reconnaissance with GEC personnel. The figure is not considered a design drawing and is included only to show the relative proximity of I-10 to the closed landfill and the expected impact to the landfill. Copies of the drawings provided by LDOTD and GEC were included in Appendix A of the January 1995 workplan.

**SCOPE OF WORK**

---

The work at this site consisted of drilling ten soil borings to characterize subsurface materials. Actual boring locations are shown in Figure 4. The purpose of the borings was to determine the following:

- the approximate thickness of waste in the area of concern;
- whether residual waste is characteristically hazardous; and
- whether detectable levels of priority pollutants are present.

Waste or soil samples were collected to determine if subsurface materials were characteristically hazardous waste. To make this determination, selected samples from each boring were analyzed for ignitability, corrosivity, reactivity, and toxic characteristic leaching procedure (TCLP) volatile and semivolatile organic constituents, metals, pesticides, and herbicides. These samples were also analyzed for volatile and semivolatile organic constituents, metals, pesticides and PCBs. The results of these analyses can be used to determine the appropriate disposal method of excavated material.

Borings were advanced to natural soils immediately below the waste. At boring locations where waste was not encountered, borings were advanced to a depth of 10 feet below land surface (bls).

This report shows boring locations, describes drilling activities, sampling procedures, sample handling procedures, decontamination procedures, field quality assurance/quality control methods, and sample results. Conclusions with appropriate supporting documentation such as boring logs, laboratory reports, and chain-of-custody forms are also included.

**4.1 SOIL BORING LOCATIONS**

To characterize subsurface materials, ten shallow borings were drilled at the locations shown in Figure 4. All borings were drilled through subsurface waste (if present) and into the underlying soils.

Borings were located in the following areas:

- The elevated relatively flat portion of the right of way; one boring in each of the flat spaces between berms (B-1, B-2, B-3, B-4) and one boring west of the westernmost berm (B-5). These borings ranged from approximately 20 to 40 feet south of the fence on the northern edge of the right of way;
- One boring through one of the berms (B-7);
- Three borings in the existing ditch (B-8, B-9 and B-10). These areas will be covered with pavement in the widening; and
- Two borings in the vicinity of the thickest part of material to be removed based on the sections provided by GEC (B-6 and B-9).

**4.2 SOIL BORING AND SAMPLING PROCEDURES**

The borings were drilled using solid stem rotary methods. Borings were advanced by dry auger methods until free water was encountered. When free water was encountered in a boring, drilling operations were stopped for 10 to 15 minutes and the water level allowed to rise. The initial water level and the water level after 10 minutes were noted and recorded on the boring log. The completed boring logs are included in Appendix A.



The borings were continuously sampled on 2-foot intervals to the total depth of each boring. Natural soil or waste samples were collected by pushing a thin walled Shelby tube through each 2-foot interval. For intervals where there was no recovery of materials in the Shelby tubes, samples were collected from the flight augers for that interval. All borings were sampled and described by a WCC geologist.

Each two-foot interval was visually inspected to determine if the sample was soil, waste, or a mixture of soil and waste. A portion from each two-foot interval was retained for headspace analysis using a photoionization detection device (Microtip). Following collection, at least thirty minutes was allowed to elapse between the time of collection of the sample and the headspace reading. Headspace readings were recorded on the boring logs. If waste was not encountered in a boring, one soil sample was selected for laboratory analysis from each boring. The sample interval was based on the results of the headspace readings and visual observations of the soils. Borings where waste was not encountered were drilled to a maximum depth of 10 feet bls. If waste was encountered at a boring location, waste materials from the entire boring were placed in a clean stainless steel bowl, mixed, and a composite sample of the waste collected. All borings were advanced through the waste (when present) into the underlying native soil.

Upon completion of sampling activities, each borehole was grouted the full depth using a cement/bentonite grout. Cap materials were tamped back over the surface of the grouted borehole.

#### **4.3 BORING LOGS**

Soil boring logs were recorded in the field and are included in Appendix A. Soil classifications were in accordance with the Unified Soil Classification System. Soil classifications were prepared in the field at the time of sampling by a WCC geologist.

The field geologist described and classified each stratum. The locations of strata changes are defined on the logs at the appropriate depth. Depths are recorded to the nearest tenth of a foot. When depths were estimated, the estimated range was noted.

The secondary features or changes within each stratum were also recorded at the appropriate depth on the boring log where the change occurred.

Other information was placed on the soil boring logs, as appropriate, including:

- The depth of first encountered free water and the depth of water after allowing the level to partially stabilize for 10 minutes.
- The estimated depth interval for each soil sample taken, classified, and/or retained, the length of sample recovery and the sampler type and size.
- Microtip readings for each interval.

#### **4.4 DECONTAMINATION AND CROSS-CONTAMINATION CONTROL**

Prior to any drilling activities and between each boring location, all equipment used in the drilling was decontaminated using either steam cleaning or high pressure/hot water wash. Sampling equipment was decontaminated using the following procedures:

1. Washing with a phosphorous-free detergent solution (i.e. Alconox)
2. Triple rinsing with deionized water

A decontamination area was set up for the drilling rig prior to the start of any drilling activities. All waste sampling materials and decontamination wash waters were containerized for disposal by GEC.

In order to minimize the possibility of cross-contamination, strict cross-contamination control procedures were followed. These include:

- Sample jars were kept in limited access area until used.
- Latex gloves were worn during all sampling activities and changed between sample locations.

- **Clean plastic sheeting was placed at the sampling area and all sampling equipment was placed on these sheets. This plastic was discarded after use.**
- **All purge water, decontamination water and discarded gloves and plastic sheeting was containerized for disposal by GEC.**

#### **4.5 SAMPLE HANDLING PROCEDURES**

**All samples collected were transferred directly to clean new sample containers in accordance with Table 1 of the January 1995 workplan. All samples were properly preserved and placed on ice upon collection in accordance with Table 1 of the workplan. Each sample container was labeled. Each sample label included: sample number, sample location, sample matrix, date, time, sampler's initials, method of preservation, and analysis.**

**The person collecting the sample initiated document(s) at the source of the sample and started the chain-of-custody procedure. Chain-of-custody documentation included the following applicable data:**

- **Field sample number and site name and project**
- **Date and time sample taken**
- **Date sample submitted to laboratory**
- **Sample taken by (signature)**
- **Information describing source of sample and sample itself**
- **Number of shipping containers**
- **Signature of persons relinquishing and obtaining custody of samples**

**The samples were kept in a limited access area at the proper temperature until custody was relinquished from the site and formal documentation of the transfers completed. Samples were shipped by overnight courier to the designated analytical laboratory, PACE Laboratories in St. Rose, Louisiana. The chain-of-custody form is included in Appendix B at the end of the laboratory report.**

**4.6 DOCUMENTATION**

For documentation purposes, all information pertinent to field observations and sampling was recorded in a field logbook with consecutively numbered pages. Entries in the logbook included the following:

- Location of sampling activity
- Number of samples taken
- Description of sampling point
- Date and time of collection
- Collector's sample identification number(s)
- Collector's name
- Equipment calibration as applicable

Other documentation included the chain-of-custody, previously described, to track sample transfers.

**ANALYTICAL PARAMETERS AND ANALYTICAL METHODS**

---

Soil and waste samples were analyzed for the same parameters. These samples were analyzed for the parameters listed below.

**Hazardous Waste Characteristics**

- ignitability;
- reactivity;
- corrosivity;
- toxicity (TCLP metals and organic constituents)

**Organic and Inorganic Constituents**

- volatile organic constituents listed in Method 8240;
- semivolatile organic constituents listed in Method 8270; and
- pesticides and PCBs listed in Method 8080
- total metals

Analytical methods for the above parameters are listed in Table 1.

**QUALITY ASSURANCE/QUALITY CONTROL PROGRAM**

---

To attain the quality assurance objectives in terms of accuracy, precision, completeness, comparability and representativeness, the following additional requirements were implemented for this project:

- **A duplicate soil sample analysis was performed to measure variability induced by sampling, handling and laboratory procedures. This duplicate was run on the sample collected from boring B-5.**
- **One trip blank analysis for volatile organic constituents was performed to measure bias introduced by field handling, shipping and laboratory procedures.**
- **Representativeness was assured by meticulous sampling and testing and not by statistical methods.**

**Quality Assurance and Quality Control (QA/QC) was maintained by the laboratory in accordance with its standard QA/QC practices.**

**Review of the QA/QC results indicates recoveries of laboratory and matrix spikes and surrogates were generally within laboratory QC limits with some matrix effects noted. Overall, the data appears to be of acceptable quality. No compounds were detected in either the trip blank or the laboratory blanks. The laboratory QA/QC summary is provided in the back of the laboratory report in Appendix B.**

**SUMMARY OF RESULTS**

---

The field and laboratory results for this investigation are presented below. Supporting information is provided in Appendix A (boring logs) and Appendix B (Laboratory Report). The attached Tables and Figures present the data for ease of understanding.

**7.1 FIELD RESULTS**

A summary of the field results for each boring is presented in Table 2 and includes the depth intervals of each stratigraphic unit, maximum headspace interval, depth of groundwater, boring total depth, and sample interval.

**7.1.1 Boring Locations and Depths**

The boring locations for borings B-1 through B-10 are shown in Figure 4. Borings B-1 through B-7 were drilled at locations where landfill waste materials were encountered while B-8, B-9 and B-10 were drilled in the existing drainage ditch where no landfill waste materials were noted.

Boring depths ranged from 10 feet bls to 20 feet bls, depending on the occurrence and thickness of landfill waste materials. Where waste was encountered, the borings extended a maximum of three feet below the waste materials. Where waste was absent, the borings were terminated at 10 feet bls in accordance with the January 1995 workplan.

**7.1.2 Stratigraphy**

Three separate units were encountered in the study area. These units consisted of the following in order, from land surface downward (See Figure 5);

- **Silty Clay and Clay FILL (cap material)**
- **Landfill Debris or WASTE and Silty Clay FILL**
- **Natural Clays and Silty Clay (CH)**

The surficial silty clay and clay cap material ranged in thickness from two feet to six feet. The thickest landfill cap material was noted on the easternmost boring (B-1) and westernmost borings (B-5 and B-6), with most of the borings having approximately two feet of cap materials overlying the waste materials.

Landfill waste materials mixed with silty clay fill material were noted in borings B-1 through B-7. The waste was encountered below the cap material at two feet bls in most locations. Recovery of landfill waste materials in the Shelby tubes was generally poor. Samples of the waste were collected from the flight augers for each interval. The thickness of the landfill waste varied from three feet (B-6) to seventeen feet (B-3). Landfill waste materials were not found in borings B-8, B-9 or B-10, all of which were drilled along the existing drainage ditch.

The natural basal materials below the landfill waste consisted of silty clays and clays.

### **7.1.3 Headspace Readings**

Maximum headspace readings in the borings were relatively low with maximum Microtip readings occurring generally within the landfill waste, typically highest near the upper contact of the waste. In borings B-8, B-9 and B-10, where no waste was encountered, maximum headspace readings occurred at the 2 to 4 foot, 6 to 8 foot and 6 to 8 foot intervals, respectively. Samples from these intervals were therefore sent for laboratory analyses in accordance with the workplan.

### **7.1.4 Occurrence of Groundwater**

Groundwater was encountered in six of the ten borings (B-1, B-3, B-4, B-5, B-6 and B-8). When encountered, groundwater occurred immediately below the cap material (at the waste material contact), typically at two to four feet bls. Groundwater was not



encountered in two borings where wastes were present (B-2 and B-7) or in two of the three borings in the existing drainage ditch (B-9 and B-10)

#### **7.1.5 Results by Boring**

The field results for each boring are further discussed below.

##### **B-1**

Boring B-1, the easternmost boring, was drilled to a total depth of 14 feet bls. A light gray and tan silty clay cap fill material was encountered from land surface to 6 feet bls, at which depth groundwater was encountered. Landfill waste material and silty clay was encountered from 6 feet to 12 feet bls. A greenish gray silty clay was encountered at 12 feet. Headspace readings ranged from 0.2 ppm to a maximum of 13.2 ppm at 6 to 8 feet bls.

##### **B-2**

Boring B-2 was drilled to a total depth of 15 feet bls. A yellowish brown silty clay cap fill material was encountered from land surface to 2 feet bls. Landfill waste material and silty clay was encountered from 2 feet to 13 feet bls. A greenish gray silty clay was encountered at 13 feet. Headspace readings ranged from nondetect to a maximum of 6.0 ppm at 2 to 4 feet bls.

##### **B-3**

Boring B-3 was drilled to a total depth of 20 feet bls. A greenish gray silty clay cap fill material was encountered from land surface to 2 feet bls. Landfill waste material and silty clay was encountered from 2 feet to 19 feet bls. Groundwater was encountered at a depth of 5 feet bls. A gray and tan clay was encountered at 19 feet. Headspace readings ranged from nondetect to a maximum of 17.3 ppm at 16 to 18 feet bls.

**B-4**

Boring B-4 was drilled to a total depth of 20 feet bls. A yellowish brown and gray silty clay cap fill material was encountered from land surface to 3 feet bls. Landfill waste material and silty clay was encountered from 3 feet to 19 feet bls. Groundwater was encountered at a depth of 4.5 feet bls. A light tan clay to silty clay was encountered at 19 feet. Headspace readings ranged from 2.0 ppm to a maximum of 18.0 ppm at 12 to 4 feet bls.

**B-5**

Boring B-5, the westernmost boring, was drilled to a total depth of 12 feet bls. A gray and yellowish brown silty clay to clay cap fill material was encountered from land surface to 2 feet bls. Landfill waste material and silty clay was encountered from 2 feet to 11 feet bls. Groundwater was encountered at a depth of 4 feet bls. A gray silty clay was encountered at 11 feet. Headspace readings ranged from 2.7 ppm to a maximum of 19.6 ppm at 8 to 10 feet bls.

**B-6**

Boring B-6 was drilled to a total depth of 10 feet bls. A light gray and reddish brown silty clay cap fill material was encountered from land surface to 4 feet bls. Landfill waste material and silty clay was encountered from 4 feet to 7 feet bls. Groundwater was encountered at a depth of 4 feet bls. A gray silty clay to clay was encountered at 7 feet bls. Headspace readings ranged from nondetect to a maximum of 8.7 ppm at 6 to 8 feet bls.

**B-7**

Boring B-7 was drilled atop an existing berm to a total depth of 10 feet bls. A gray and brown silty clay cap fill material was encountered from land surface to 2 feet bls. Some landfill waste material mixed with silty clay was encountered from 2 feet to 8 feet bls. Groundwater was not encountered in the boring. A gray silty clay was encountered at

8 feet bls. Headspace readings ranged from 1.7 ppm to a maximum of 7.5 ppm at 2 to 4 feet bls.

**B-8**

Boring B-8 was drilled in the existing drainage ditch to a total depth of 10 feet bls. A light gray and brown silty clay cap fill material was encountered from land surface to 7 feet bls. A gray silty clay was encountered from 7 feet to 10 feet bls. No waste material was encountered. Groundwater was encountered at a depth of 4 feet bls. An interval of coarse wet sand was noted from 6.0 to 6.6 feet bls. Headspace readings ranged from 3.5 ppm to a maximum of 9.6 ppm at 2 to 4 feet bls, which was the interval sampled.

**B-9**

Boring B-9 was drilled in the existing drainage ditch to a total depth of 10 feet bls. A light gray and tan silty clay cap fill material was encountered from land surface to 8 feet bls. A greenish gray silty clay was encountered from 8 feet to 10 feet bls. No waste material was encountered. Groundwater was not encountered in the boring. An interval of coarse wet sand was noted at 7.0 feet bls. Headspace readings ranged from nondetect to a maximum of 9.2 ppm at 6 to 8 feet bls, which was the interval sampled.

**B-10**

Boring B-10 was the easternmost boring drilled in the existing drainage ditch to a total depth of 10 feet bls. A light brown silty clay to clay cap fill material was encountered from land surface to 3 feet bls. A yellowish brown silty clay was encountered from 3 feet to 10 feet bls. No waste material was encountered. Groundwater was not encountered in the boring. Headspace readings ranged from 2.4 ppm to a maximum of 4.2 ppm at 6 to 8 feet bls, which was the interval sampled.

## **7.2 ANALYTICAL RESULTS**

The analytical results are presented on Table 3 (hazardous waste characteristics), Table 4 (hazardous constituents) and Table 5 (total metals). The findings are discussed below.

### **7.2.1 Hazardous Waste Characterization**

Samples collected from the waste materials were analyzed for full hazardous waste characteristics. The results indicate that none of the samples exceeded the criteria for classification as a hazardous waste. Corrosivity results indicate pH values between 6.91 and 8.30 standard units. Reactivity and ignitability results were below regulatory levels for all samples. TCLP (toxicity) results were non detect for all volatiles, semivolatiles, pesticides and herbicides. Leachable mercury, barium, selenium and lead were detected in various samples at concentrations well below TCLP regulatory limits.

### **7.2.2 Organic and Inorganic Constituents**

Relatively low levels of various organic compounds and metals were detected in samples collected during this assessment. These results are summarized by parameter suite.

#### Volatile Organic Compounds

Acetone was detected in every sample collected except the sample from B-10. Detected acetone concentrations included 139 ug/kg in B-1, 45.7 ug/kg in B-2, 69.9 ug/kg in B-3, 24.4 ug/kg in B-4, 132 ug/kg in B-5, 105 ug/kg in B-6, 251 ug/kg in B-7, 17.1 ug/kg in B-8 and 33.3 ug/kg in B-9. 2-butanone was detected in B-1 (31 ug/kg), B-5 (28.9 ug/kg) and B-6 (33.4 ug/kg). Carbon disulfide was detected only in B-5 at a concentration of 11.5 ug/kg but was not detected in the B-5 duplicate. Acetone, 2-butanone, and carbon disulfide are considered common laboratory artifacts. These constituents were not detected in the trip blank however.

Chlorobenzene was detected in all waste samples at concentrations of 117 ug/kg in B-1, 144 ug/kg in B-2, 61.6 ug/kg in B-3, 160 ug/kg in B-4, 361 ug/kg in B-5, 335 ug/kg in B-6, and 14.6 ug/kg in B-7. Ethylbenzene was detected in the sample from B-5 at a

concentration of 26.8 ug/kg. Xylenes were detected in two samples at concentrations of 177 ug/kg in B-4 and 53.7 ug/kg in B-5. Benzene was detected in the sample from B-5 at 10.9 ug/kg, but was not detected in the B-5 duplicate.

#### Semivolatile Organic Compounds

The only detected semivolatile compound was bis (2-ethylhexyl) phthalate which was detected in B-1, B-2 and B-3 at concentrations of 21,600 ug/kg, 12,200 ug/kg, and 5,800 ug/kg, respectively. Bis (2-ethylhexyl) phthalate is commonly associated with plasticizers.

#### Pesticides

Trace levels of various pesticides were detected in the samples collected. Delta-BHC was detected in B-6 at 42.5 ug/kg. 4,4'-DDD was detected at concentrations of 47 ug/kg in B-7 and 118 ug/kg in B-9. 4,4'-DDE was detected at concentrations of 117 in B-1, 80.3 ug/kg in B-6, and 70.8 ug/kg B-7. 4,4'-DDT was detected in B-9 at a concentration of 258 ug/kg. Dieldrin and methoxychlor were detected in the sample from B-1 at concentrations of 71.6 ug/kg and 422 ug/kg, respectively.

#### PCBs

PCBs were detected in all borings containing landfill waste material, however Aroclor 1242 was the only PCB detected in the samples collected. Detected concentrations of Aroclor 1242 included 2,540 ug/kg in B-1, 6,810 ug/kg in B-2, 610 ug/kg in B-3, 532 ug/kg in B-4, 436 ug/kg in B-5, 997 ug/kg in B-6, and 333 ug/kg in B-7.

#### Metals

Total metals results are summarized in Table 5. Detected metals included arsenic, barium, cadmium, chromium, lead, and mercury. Arsenic was detected at concentrations ranging from 18.8 mg/kg to 71.8 mg/kg. Barium was detected at concentrations ranging from 96.0 mg/kg to 553 mg/kg. Cadmium was detected at concentrations ranging from 1.34 mg/kg to 7.37 mg/kg. Chromium was detected at concentrations ranging from 17.6

mg/kg to 92.0 mg/kg. Lead was detected at concentrations ranging from <5 mg/kg to 333 mg/kg. Mercury was detected at concentrations ranging from 0.87 mg/kg to 4.1 mg/kg. Selenium was not detected in any samples collected. Silver was detected only in B-4 at a concentration of 1.8 mg/kg. These metals results were generally within typical published ranges for soils except for cadmium. Cadmium concentrations were above the typical ranges but still relatively low and consistent for all borings.

**CONCLUSIONS**

---

The results of the investigation verifies the approximate limits of the landfill in the subject area to be immediately north of the existing drainage ditch. A silty clay cap material overlies the landfill waste material and is typically two feet in thickness, increasing to approximately six feet in thickness at the easternmost location sampled and four feet in the westernmost location sampled. The thickness of the landfill waste materials varies from three feet to as much as 17 feet, with the thickest areas being between the existing berms. Groundwater with a hydrostatic head occurs at the top of the waste materials in most of the locations sampled in relatively moderate quantities. The landfill waste overlies a natural silty clay and clay unit. Table 2 and Figure 5 illustrate these field conditions.

Based on analytical results, the landfill waste materials do not meet the regulatory criteria for hazardous waste characteristics. As such, the wastes may be considered a solid waste (i.e., municipal or industrial solid waste) and handled as such. Minor levels of various volatile, semivolatile, pesticide and PCB compounds were detected in the samples collected, as well as naturally occurring metals. It would not necessarily be considered atypical of a municipal landfill operating during the period of the late 1950's and early 1960's to find the above listed compounds in varying concentrations. The presence of these compounds may warrant consideration of handling the excavated material as industrial solid waste with disposal at a permitted facility of this nature.

**LIMITATIONS**

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Professional judgements are presented in the report. They are based partly on the technical information gathered, including analytical data, partly on our understanding of the facility's operations and partly on our experience of subsurface conditions in the area. The borings may not be representative of varying subsurface conditions at other locations at the site. The results presented herein are applicable only to this specific site and should not be used for any other purposes. We do not guarantee the performance of the project in any respect other than our engineering work and judgments rendered meet the standards and care of our profession.



**TABLES**

TABLE 1

**SUMMARY OF ANALYTICAL PROGRAM  
I-10 RIGHT OF WAY SUBSURFACE INVESTIGATION**

<b>Hazardous Waste Characteristics</b>	
<b>Corrosivity</b>	Method 9045
<b>Reactivity</b>	Method 7.3.3.2
<b>Igniteability</b>	Method 1010
<b>Toxicity (TCLP)</b>	Leachate Method 1311 zero headspace by 40 CFR 268; leachate analyses by the following:
Volatiles	Method 8240
Semivolatiles	Method 8270
Pesticides	Method 8080
Herbicides	Method 8150
Metals	Method 6010, except mercury which was Method 7470
<b>Organic Constituents</b>	
<b>Volatile Organic Compounds</b>	Method 8240
<b>Semivolatile Organic Compounds</b>	Method 8270
<b>Pesticides</b>	Method 8080
<b>PCBs</b>	Method 8080
<b>Inorganic Constituents</b>	
<b>Metals: As, Ba, Cd, Cr, Pb, Hg, Se, Silver (Ag)</b>	Analysis by ICP Methods except mercury which was Method 7470

NOTE: All methods as described in SW-846 except where noted in Laboratory Report.

TABLE 2  
 SUMMARY OF FIELD BORING RESULTS  
 I-10 RIGHT OF WAY SUBSURFACE INVESTIGATION

	B-1	B-2	B-3	B-4	B-5	B-6	B-7	B-8	B-9	B-10
Cover Material (ft bls)	0-6	0-2	0-2	0-3	0-2	0-4	0-2	0-7	0-8	0-3
Waste Interval (ft bls)	6-12	2-13	2-19	3-19	2-11	4-7	2-8	NE	NE	NE
Maximum Organic Vapor Interval (ft bls)/Reading (ppm)	6-8/13.2	2-4/6.0	16-18/17	12-14/18.0	8-10/19.6	6-8/8.7	2-4/7.5	2-4/4.6	6-8/8.2	6-8/4.2
Depth to Water (ft bls)	6	NE	5	4.5	4	4	NE	4	NE	NE
Boring Depth (ft bls)	14	15	20	20	12	10	10	10	10	10
Sampled Interval (ft bls)	6-12	2-13	4-18	4-16	2-11	4-7	2-4	2-4	6-8	6-8

NE = Free water not encountered.

TABLE 3  
 HAZARDOUS WASTE CHARACTERISTICS ANALYTICAL RESULTS  
 I-10 RIGHT OF WAY SUBSURFACE INVESTIGATION

TCLP RESULTS (TOXICITY)											Regulatory Level
Organics (µg/l)	B-1	B-2	B-3	B-4	B-5	B-6	B-7	B-8	B-9	B-10	
VOCs	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ADL
SVOCs	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ADL
Pesticides	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ADL
Herbicides	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ADL
Metals (mg/l)											
Mercury	0.017	0.017	0.014	0.012	0.012	0.014	0.016	0.014	0.014	0.011	> 0.200
Barium	ND	1.8	1.5	1.2	1.5	1.1	1.8	1.5	2.4	1.1	> 100
Selenium	ND	ND	ND	0.27	ND	ND	ND	ND	ND	ND	> 1.0
Lead	ND	ND	ND	ND	1.0*	ND	ND	ND	ND	ND	> 5.0
OTHER HAZARDOUS WASTE CHARACTERISTIC RESULTS											
Corrosivity (pH in standard units)	7.82	7.61	8.25	8.23	7.95	7.68	6.91	7.98	7.96	8.30	≤ 2 or > 12.5
Reactivity (mg/kg)	ND	ND	ND	ND	60**	ND	ND	ND	ND	ND	> 500 mg/kg
Ignitability	No	No	No	No	No	No	No	No	No	No	Flashpoint < 60° C

ADL = Regulatory level is above method detection limit for all compounds.  
 ND = Not detected using detection levels below regulatory limits.  
 \* ND in duplicate.  
 \*\* Sulfide reactivity: ND in duplicate.

TABLE 4  
HAZARDOUS CONSTITUENT ANALYTICAL RESULTS  
I-10 RIGHT OF WAY SUBSURFACE INVESTIGATION ( $\mu\text{g}/\text{kg}$ )

	B-1	B-2	B-3	B-4	B-5	B-6	B-7	B-8	B-9	B-10
<b>Volatile Organic Compounds</b>										
Acetone	139	45.7	69.9	24.4	132	105	251	17.1	33.3	<10
2-butanone	31	<10	<10	<10	28.9*	33.4	<10	<10	<10	<5
Carbon Disulfide	<5	<5	<5	<5	11.5*	<5	<5	<5	<5	<5
Chlorobenzene	117	144	61.6	160	361	335	14.6	<5	<5	<5
Ethylbenzene	<5	<5	<5	<5	26.8	<5	<5	<5	<5	<5
Xylenes (total)	<5	<5	<5	177	53.7	<5	<5	<5	<5	<5
Benzene	<5	<5	<5	<5	10.9*	<5	<5	<5	<5	<5
<b>Semivolatile Organic Compounds</b>										
bis(2-ethylhexyl)Phthalate	21,600	12,200	5,800	<3,330	<3,330	<3,330	<3,330	<333	<333	<333
<b>Pesticides</b>										
delta-BHC	<17	<17	<17	<17	<17	42.5	<17	<1.7	<17	<1.7
4,4'-DDD	<33	<33	<33	<33	<33	<33	47.0	<3.3	118	<3.3
4,4'-DDE	117	<33	<33	<33	<33	80.3	70.8	<3.3	<33	<3.3
4,4'-DDT	<33	<33	<33	<33	<33	<33	<33	<3.3	258	<3.3
dieldrin	71.6	<33	<33	<33	<33	<33	<33	<3.3	<33	<3.3
Methoxychlor	422	<170	<170	<170	<170**	<170	<170	<17	<170	<17
<b>PCBs</b>										
Arochlor-1242	2540	6810	610	532	436	997	333	<33	<66	<33

Results reflect detected constituents only.  
\* Not detected in duplicate.

TABLE 5

**TOTAL METALS ANALYTICAL RESULTS  
I-10 RIGHT OF WAY SUBSURFACE INVESTIGATION**

	B-1	B-2	B-3	B-4	B-5	B-6	B-7	B-8	B-9	B-10	Typical Range <sup>1</sup>
<b>Total Metals Results (mg/kg)</b>											
Arsenic	71.8	43.5	28.3	26.9	18.8	59.3	25.8	40.7	33.4	32.0	0.1-97
Barium	536	553	289	218	449	214	193	96.0	264	257	10-500
Cadmium	7.37	4.79	6.69	3.94	3.28	3.6	2.53	1.34	2.0	2.21	0.01-0.7
Chromium	54.8	34	33.3	35.2	43.7	92.0	44.9	20.6	21.4	17.6	1-2000
Lead	68.4	307	86.2	91.9	24	333	95.8	8.0	24.3	<5	<10-700
Mercury	3.1	2.6	1.2	2.6	4.1	1.7	1.3	1.2	1.0	0.87	<0.01-4.6
Selenium	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<0.1-4.3
Silver	<1	<1	<1	1.8	<1*	<1	<1	<1	<1	<1	0.01-5

\* Detected in duplicate at 9.9 mg/kg.

<sup>1</sup> Source: Shacklett, N.T., and Boerngen, J.G., "Elemental Concentrations in Soils and Surficial Material of the Continuous U.S.\* USGS Professional paper 1270, U.S. Government Printing Office, Washington, D.C., 1984

# Limited Subsurface Investigation

Consolidated Force Main Alignment

Nairn Drive Section

Baton Rouge, East Baton Rouge Parish, Louisiana

March 4, 2011

Terracon Project Nos. EH097303



**Prepared for:**  
Shread-Kuyrkendall & Associates, Inc.  
Baton Rouge, Louisiana

*Remediation Services Division*

Manager: \_\_\_\_\_  
Team Leader: \_\_\_\_\_  
AI #: \_\_\_\_\_  
TEMPO Task #: \_\_\_\_\_  
 Desk Copy File Room: \_\_\_\_\_

**Prepared by:**  
Terracon Consultants, Inc.  
Baton Rouge, Louisiana

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# Terracon

Geotechnical   ■   Environmental   ■   Construction Materials   ■   Facilities

March 4, 2011



Shread-Kuyrkendall & Associates, Inc.  
13000 Justice Avenue, Suite 16  
Baton Rouge, LA 70816

Attn: Mr. David Einsel, P.E.

Re: Limited Subsurface Investigation  
Consolidated Force Main Alignment  
Nairn Drive Section  
Baton Rouge, East Baton Rouge Parish, Louisiana  
Project No. EH097303

Dear Mr. Einsel:

Terracon Consultants, Inc. (Terracon) is pleased to submit this Limited Subsurface Investigation (LSI) report for the above referenced site. This investigation was performed in accordance with Terracon's proposal dated July 27, 2010 (revised August 12, 2010).

We appreciate the opportunity to perform the Limited Subsurface Investigation (LSI) services for Shread-Kuyrkendall & Associates. Please contact the undersigned if you should have any questions regarding this report at (225) 344 6052.

Sincerely,  
**Terracon Consultants, Inc.**

  
Richard M. Simon  
Senior Principal/ Regional Manager

  
Stephen E. Greaber, PE  
Office Manager

RMS/SEG:jrk

Enclosure



Terracon Consultants, Inc. 2822-B O'Neal Lane Baton Rouge, Louisiana 70816  
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Geotechnical



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Construction Materials



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**Figures:** Figure 1 – Topographic Vicinity Map  
Figure 2 – Soil Boring Location Map  
Figure 3 – Soil Profile North of I-10  
Figure 4 – Soil Profile South of I-10

**Appendix A:** Soil Boring Logs

**Appendix B:** Analytical Data Tables

**Appendix C:** Laboratory Analytical Report

**Limited Subsurface Investigation**  
**Consolidated Force Main Alignment**  
**Nairn Drive Section**  
**Baton Rouge, East Baton Rouge Parish, Louisiana**

Terracon Project Nos. EH097303  
March 4, 2011

## 1.0 INTRODUCTION

### 1.1 Site Description

<b>Site Name</b>	Consolidated Force Main Alignment
<b>Site Location/Address</b>	Nairn Drive, Baton Rouge, East Baton Rouge Parish, Louisiana
<b>Land Area</b>	Approximately 1,400 linear feet.
<b>Site Improvements</b>	The alignment traverses a gravel parking lot, recreational park, vacant field, and interstate highway.

The site has an approximate center at Latitude 30° 25' 27.7" North and Longitude 91° 08' 42.7" West with an average elevation of approximately 32 feet National Geodetic Vertical Datum (NGVD). A copy of a portion of the United States Geological Survey (USGS) 1995 Baton Rouge East, Louisiana 7.5-Minute Series topographic map depicting the site vicinity is presented on Figure 1 and a Soil Boring Location Map is presented on Figure 2.

### 1.2 Background

Terracon developed a scope of services based on information presented in the Phase I Environmental Site Assessment (ESA) and Geotechnical Investigation reports, dated April 20 and October 20, 2010, respectively, performed by Terracon. This information identified the former Baton Rouge landfill, located east of Nairn Drive, as a Recognized Environmental Condition in connection with the site.

Based upon a review of the historical aerial photography, the proposed alignment along Nairn Drive is located along the approximate western edge of the former landfill facility. It is understood that the former landfill extends from Dawson's Creek to the north across Interstate 10. The old landfill was reportedly partially excavated to allow for the construction of the Interstate 10 alignment. The initial geotechnical borings in this vicinity identified a thin layer of rubbish in three borings at depths less than 10 feet below ground surface (bgs).

## Limited Subsurface Investigation

Consolidated Force Main Alignment ■ Baton Rouge, Louisiana  
March 4, 2011 ■ Terracon Project No. EH097303



### 1.3 Scope of Services

Terracon conducted a Limited Site Investigation (LSI) at the Consolidated Force Main Alignment segment located along Narin Drive. The objective of this LSI was to further delineate the rubbish encountered during previous investigations in the proposed Force Main alignment and to identify possible environmental contaminants in the soil and/or groundwater. Terracon's LSI was conducted in accordance with Terracon's proposal dated July 27, 2010 (revised August 27, 2010).

This objective was generally achieved by further defining the horizontal and vertical extent of rubbish in the subsurface along the proposed alignment and by comparing the analytical results of collected analytical samples to the Louisiana Department of Environmental Quality (LDEQ) Risk Evaluation Corrective Action Program (RECAP) Screening Standards for Soil at Industrial Sites and Groundwater.

### 1.4 Standard of Care

Terracon's services were performed in a manner consistent with generally accepted practices of the profession undertaken for similar studies in the same geographical area during the same time period. Terracon makes no warranties, either expressed or implied, regarding the findings, conclusions or recommendations. Please note that Terracon does not warrant the work of laboratories, regulatory agencies or other third parties supplying information used in the preparation of this report. These LSI services were performed in accordance with the scope of work agreed with you, our client, as reflected in our proposal and were not restricted by ASTM E1903-97.

### 1.5 Limitations

Findings, conclusions and recommendations resulting from these services are based upon information derived from the on-site activities and other services performed under this scope of work; such information is subject to change over time. Certain indicators of the presence of hazardous substances, petroleum products, or other constituents may have been latent, inaccessible, unobservable, nondetectable or not present during these services, and we cannot represent that the site contains no hazardous substances, toxic materials, petroleum products, or other latent conditions beyond those identified during this assessment. Subsurface conditions may vary from those encountered at specific borings or wells or during other surveys, tests, assessments, investigations or exploratory services; the data, interpretations, findings, and our recommendations are based solely upon data obtained at the time and within the scope of these services.

## **1.6 Reliance**

This report has been prepared for the exclusive use of Shread-Kurykendall and Associates and the City-Parish of Baton Rouge, its affiliates and subsidiaries and their successors, assigns, and grantees; any authorization for use or reliance by any other party (except a governmental entity having jurisdiction over the site) is prohibited without the express written authorization of Shread-Kurykendall and Associates and the City-Parish of Baton Rouge, its affiliates and subsidiaries and their successors, assigns, and grantees and Terracon. Any unauthorized distribution or reuse is at the client's sole risk.

## **2.0 FIELD ACTIVITIES AND METHODOLOGY**

### **2.1 Site Geology and Hydrology**

According to the Geologic Map of Louisiana (1984), the site is situated within the surface outcrop of the Pleistocene age Prairie Terrace. Topographically and stratigraphically lowest of the Prairie Terraces east of the Mississippi Alluvial Valley, the original terrace deposit topography lies hidden beneath a thick layer of wind deposited Peoria Loess. The terrace deposit is composed of coastal plain deposits of the late-to-middle Pleistocene streams; sediments are generally clay, silty clay loam, or sandy clay loam.

### **2.2 Soil Boring Installation**

Field activities were overseen on December 14 and 15, 2010, by Mr. Adam Kiehn, a Terracon staff geologist. As part of the scope of work, 18 soil borings were advanced at the site using a direct-push drill rig. Figure 2 presents the site layout and soil boring locations. Soil borings LF-01 and LF-14 were advanced to depths of 35 feet and 30 feet bgs, respectively. Soil borings LF-02 to LF-13 were advanced to a depth of approximately 15 feet bgs each. Additionally, on January 21, 2011 soil borings LF-14 to LF-18 were advanced to depths of 30 to 40 feet bgs.

Drilling services were performed by a State of Louisiana licensed driller utilizing direct-push drilling techniques under the supervision of a Terracon professional. Soil samples were collected using five-foot core barrel samplers equipped with clear PVC liners. Sampling equipment was cleaned using an Alconox<sup>®</sup> wash and potable water prior to the beginning of the project and before collecting each soil sample.

Soil samples were collected continuously and observed to document soil lithology, color, moisture content and sensory evidence for the presence of rubbish. The soil samples were field-screened using a photoionization detector (PID) to indicate the presence of Volatile Organic Compounds (VOC). Soil boring logs, including PID screening values, lithology descriptions and analytical sample collection depth are presented in Appendix A.

## Limited Subsurface Investigation

Consolidated Force Main Alignment ■ Baton Rouge, Louisiana  
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### 2.3 Soil Analytical Sampling

A total of seven soil samples were collected for analytical laboratory analysis based on PID screening, lithology and other field observations. The soil samples were collected from selected soil borings according to the SOW and identified respective to the soil boring identification and sample depth (e.g. LF-01 12'-14'). Rubbish was observed in many soil samples and olfactory evidence indicated the presence of rubbish at intervals of poor sample recovery. All soil samples collected were submitted to the laboratory for analysis of Volatile Organic Compounds (VOC) by EPA Method 8260, Semi-Volatile Organic Compounds (SVOC) by EPA 8270, RCRA Metals by EPA 6010/7471, Pesticides/PCBs by EPA 8081/8082, and Herbicides by EPA 8151. Two soil samples were also selected for a full Toxicity Characteristics Leaching Procedure (TCLP) by EPA 1311/8260, 8270, 6010, 8081, 8082, and 8151.

All collected soil samples were placed in laboratory provided sample containers, sealed and labeled appropriately and placed on ice in an insulated container for the duration of field activities. A chain-of-custody was prepared with sample identification, time of collection and other field information and placed inside the insulated container with the samples. The container was then sealed with a signed custody seal and relinquished to an overnight carrier for delivery to Accutest Laboratories (Accutest) located in Houston, Texas on December 16, 2010.

### 2.4 Groundwater Analytical Sampling

Following completion of soil sampling, soil borings LF-01, LF-02, LF-05, LF-06, LF-10, LF-12, and LF-14 were converted to temporary monitoring wells. The temporary monitoring well material consisted of 1-inch diameter, 0.010-inch machine slotted PVC screen, fitted with a threaded bottom cap and finished with flush joint PVC riser to the ground surface. Sufficient groundwater did not accumulate in temporary wells LF-02 and LF-06, therefore samples were not collected for analysis from those wells.

One groundwater sample was collected from temporary monitoring wells LF-01, LF-05, LF-10, LF-12, and LF-14. Prior to sample collection, the monitoring wells were purged of standing groundwater a minimum of three well casing volumes, or until the monitoring well failed to recharge (i.e., well ran dry). Subsequent to sufficient recharge, a groundwater sample was collected with a peristaltic pump fitted and dedicated tubing for each well location.

After collection of groundwater samples, the PVC well material was removed from the ground, and the borings were backfilled to the surface with cement-bentonite grout. Temporary monitoring well construction details are presented on the soil boring logs included in Appendix A. All groundwater samples collected were submitted to the laboratory for analysis of VOC by

## Limited Subsurface Investigation

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EPA Method 8260, VOC by EPA Method 8260, SVOC by EPA 8270, RCRA Metals by EPA 6010/7471, Pesticides/PCBs by EPA 8081/8082, and Herbicides by EPA 8151.

The groundwater flow direction and the depth to shallow groundwater would likely vary depending upon seasonal rainfall, nearby surficial water bodies and other geologic conditions. Without the benefit of permanently installed groundwater monitoring wells and surveyed datum, groundwater flow direction at the site cannot be ascertained. This is not anticipated to affect the findings or recommendations of this LSI.

## 3.0 DATA EVALUATION

### 3.1 Geotechnical Soil Conditions

A soil profile presenting the soil conditions along the north side of the interstate are presented in Figure 3 and the south side in Figure 4. The borings along the North side of the interstate encountered rubbish at various locations. The elevation where the rubbish is present varies across the area. Data from this area shows rubbish as deep as 15 to 20 feet below existing ground surface. On the south side of the interstate, the borings within approximately 300 feet of the interstate encountered rubbish as deep as 25 feet below existing grade.

The soils overlying the rubbish were silty clays (Unified Soil Classification System symbol, CL) and clays (CH) and are considered fill material. Below the rubbish, tan and light gray silty clays (CL) and clays (CH) consistent with typical expected Pleistocene geologic conditions were identified.

### 3.2 Soil Analytical Results

All soil results were compared to the LDEQ RECAP Screening Standards for non-industrial sites. A full listing of analyses is included in the analytical laboratory report included in Appendix B. A summary of soil analytical results is presented in Table 1. Soil sample LF-12 13 -15 feet bgs revealed an arsenic concentration of 44.5 milligrams per Kilogram (mg/Kg), which exceeds the RECAP Screening Standard of 12 mg/Kg. The remainder of the soil samples revealed concentrations less than the LDEQ RECAP Screening Standards for VOC, SVOC, Pesticides, Herbicides.

### 3.3 Groundwater Analytical Results

All groundwater results were compared to the LDEQ RECAP Screening Standards for groundwater, as presented on Table 2. A complete listing of all results and constituents is included in the laboratory report included in Appendix B.

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Lead was detected above the screening standard in all of the samples collected. Chromium and Cadmium were detected above the screening standards in GW-05. Arsenic was detected above the screening standard in GW-05, GW-10, GW-12, and GW-14. No other metal exceedances of the RECAP Screening Standards were detected. Arsenic is a common metal detected in the subsurface in this geographic area and is not believed to present significant risks associated with the planned construction activities.

Two SVOC constituents were detected above the RECAP Screening Standard. Bis (2-ethyl hexyl) phthalate was detected in all five groundwater samples above the screening standard; and 2-methylnaphthalene was detected above the screening standard in GW-12. Bis (2-ethyl hexyl) phthalate is a common plasticizer used in many household and commercial plastic products. 2-methylnaphthalene is a natural component of crude oil and can be associated with smoke, combustion engine emissions, asphalt, coal tar, and used oils. It is likely that these compounds are a result of the trash and debris encountered in the subsurface and the proximity to the previous construction activities of Interstate-10. No VOC, Pesticides or Herbicide constituents were detected above the RECAP Screening Standard.

### 3.4 Toxicity Characteristic Leachate Procedure Results

The two soil samples submitted for TCLP analysis revealed all concentrations of the leachate to be below the laboratory reporting limit and the RECAP groundwater standards. The results of this analysis are included in the Analytical Report in Appendix B.

## 4.0 CONCLUSIONS AND RECOMENDATIONS

Due to the varying elevations where rubbish is present, this area may not be suitable for directional drilling. During drilling, pockets of rubbish may be encountered and cause complications such as loss of drilling fluid and hanging up of drill pipe. It is recommended that other types of installation be considered for these areas where rubbish is present. For example, a jack and bore installation method with pits closer to the interstate, where the rubbish was reportedly removed may be considered a method with lower risk. It should be noted that the borings adjacent to the interstate encountered rubbish only near the surface. This supports the understanding that the rubbish was over-excavated and removed for the construction of the interstate.

For other areas along the alignment where trash was encountered, other possible options for installation may be more viable due to the site conditions. Open cut installation can be used in the other areas. Excavation in the rubbish area should be braced to prevent sloughing. Excavated material should be removed and properly disposed per local, state and federal regulations. Based on the environmental analytical results, this material is considered non-hazardous and may be disposed in a municipal landfill.

### Limited Subsurface Investigation

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Designers should be cautioned of placing pipes in areas where rubbish is present. The rubbish has been in place for an extended period of time and a majority of the consolidation of the material has likely already occurred. Long term secondary settlement can become an issue; therefore, flexible piping and connections should be used in this area to allow for some differential movements that could occur over the lifespan of the forcemain.

Environmental analytical results revealed arsenic in one soil sample at a level above the LDEQ screening standard. This sample was taken from a clay layer between rubbish layers and included some small fragments of metallic rubbish, which may account for the elevated arsenic levels. No other contaminants were identified in the soils above the screening standards. The two TCLP samples analyzed did not reveal levels of the constituents above the detection limit.

Multiple metals, including arsenic, cadmium, chromium and lead, in addition to bis (2-ethyl hexyl) phthalate and 2-methylnaphthalene were identified in the groundwater above the screening standards. No petroleum constituents, VOC, PCB, pesticides or herbicides were detected in the groundwater above the screening standards. In accordance with LAC 33:1.3919, Terracon recommends the findings of the environmental sampling be submitted to LDEQ, as a result of the contaminants identified above the screening standard in the groundwater.

Proper procedures should be followed with respect to worker health and safety, including appropriate personal protective equipment typical for construction projects with potentially contaminated materials. The detected compounds are not believed to be of a significant risk to human health or the environment due to non-potable uses of groundwater in the area, and as there will no long term contact with subsurface soils and groundwater during construction.

## 5.0 GENERAL COMMENTS

This report has been prepared for the exclusive use of the client for specific applications to the project as discussed here-in. The analysis and opinions expressed in this report are based upon data obtained from the soil and groundwater samples and laboratory analysis at the indicated locations or from other information discussed in this report. This report does not reflect variations in subsurface stratigraphy, hydrogeology, and contaminant distribution that may occur across the site. Actual subsurface conditions may vary and may not become evident without further assessment.

This report has been prepared in accordance with generally accepted environmental engineering practices. No warranties to third parties are intended or made. In the event any changes in the nature or location of suspected sources of contamination as outlined in this report are observed, the conclusions and recommendations contained in this report shall not be valid unless these changes are reviewed and the opinions of this report are modified or verified in writing by Terracon.



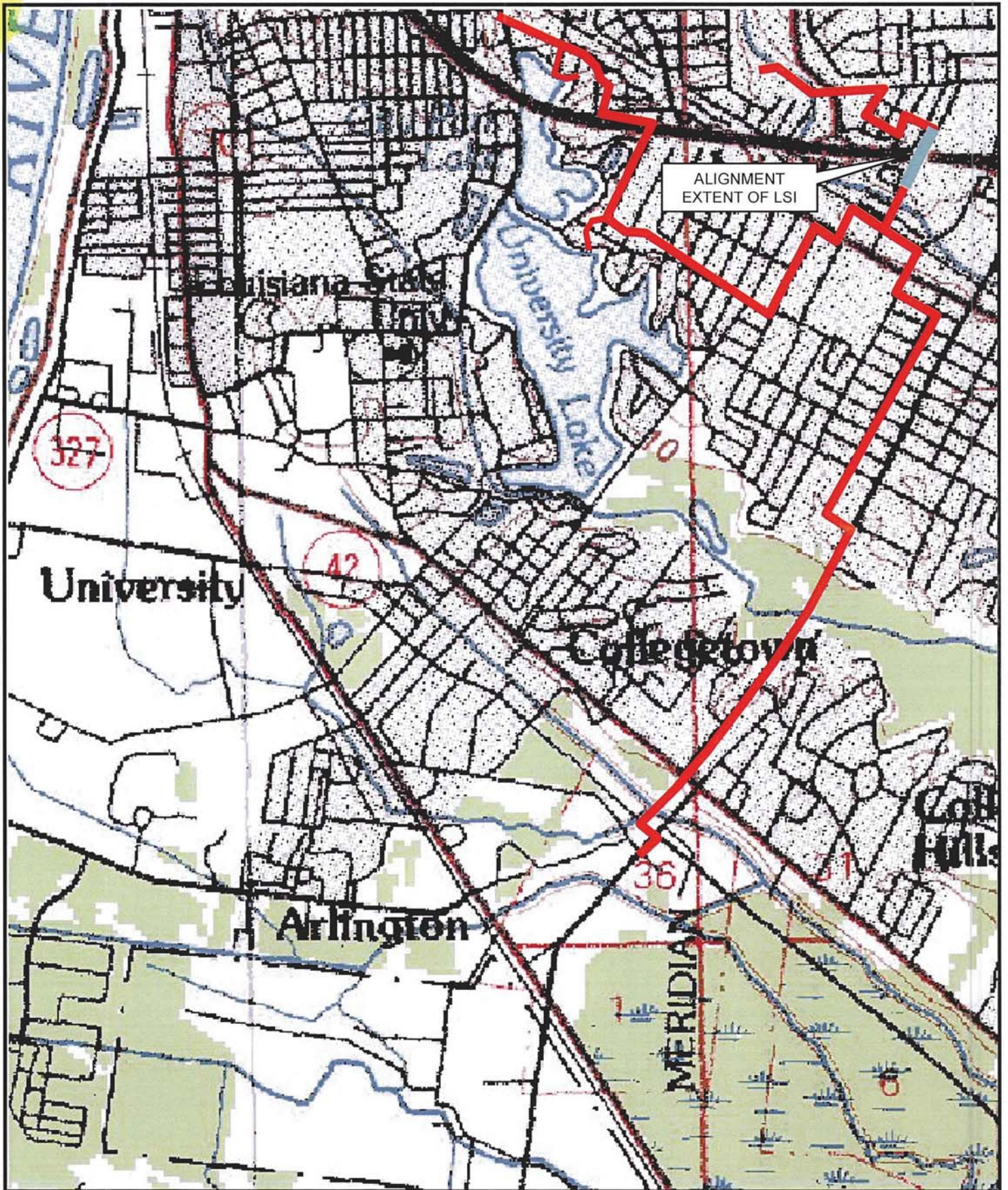
## **FIGURES**

Figure 1 – Topographic Vicinity Map

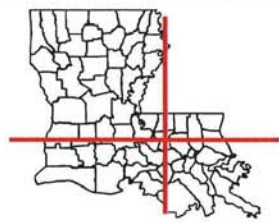
Figure 2 – Soil Boring Location Map

Figure 3 – Soil Profile North of I-10

Figure 4 – Soil Profile South of I-10



ALIGNMENT  
EXTENT OF LSI



**SITE VICINITY MAP**  
 East Consolidated Force Main  
 Baton Rouge, LA  
 7.5-Minute Topographic Map  
 Baton Rouge East, Louisiana



Fig No.  
A-1



B-29

LF-01

LF-02

LF-15

LF-03

B-28

LF-04

LF-16

LF-05

LF-06

LF-07

LF-17

LF-08

B-27

LF-09



B-26

LF-10

LF-18

LF-11

LF-12

B-25

LF-13

LF-14

B-24

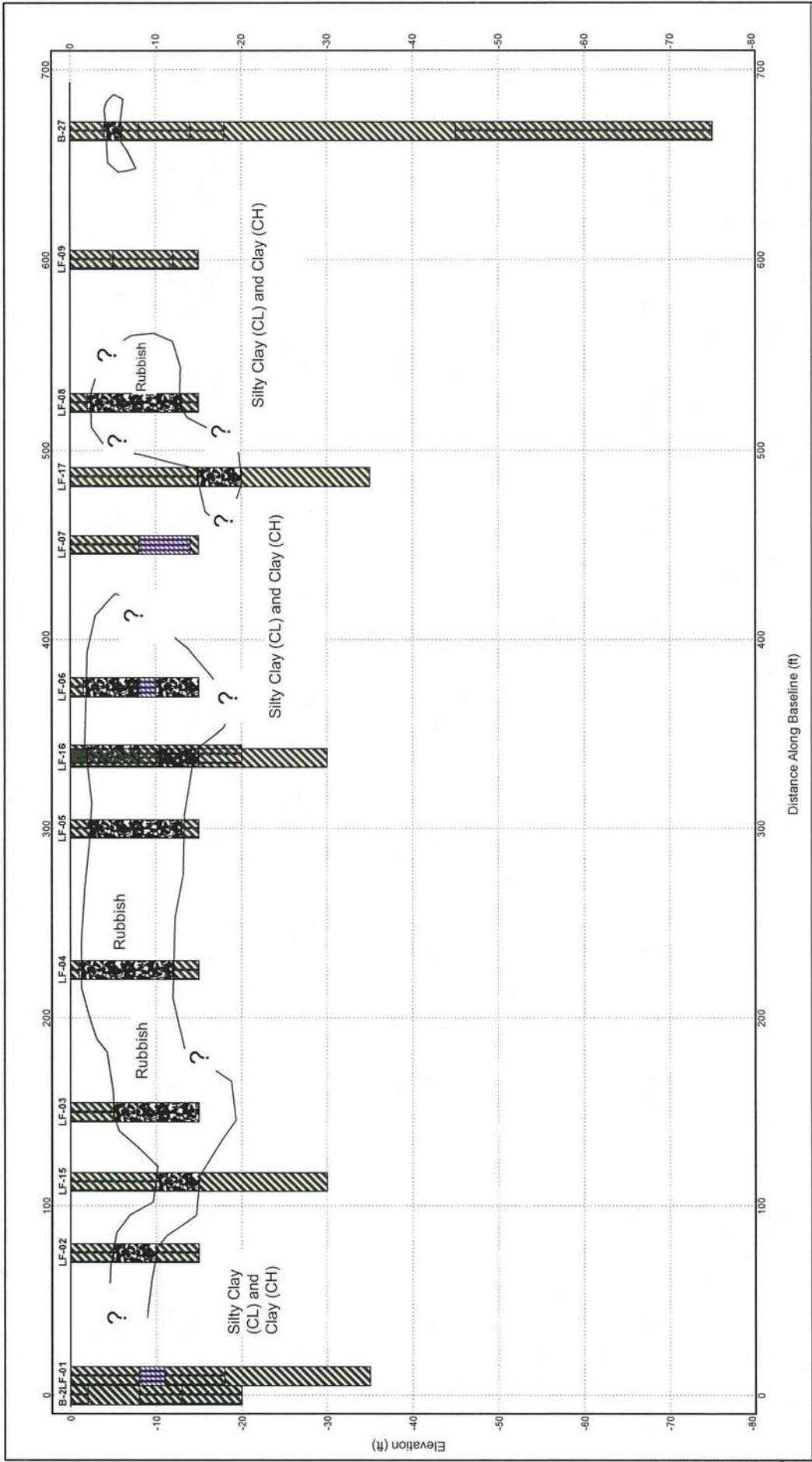


Figure 3

Geotechnical Investigation  
 Central Consolidated Force Main  
 North of Interstate 10

Project Number: EH097303

LITHOLOGY GRAPHICS

- Silty Clay (CL)
- Rubbish
- High Plasticity Clay (CH)
- Clayey Silt (ML)



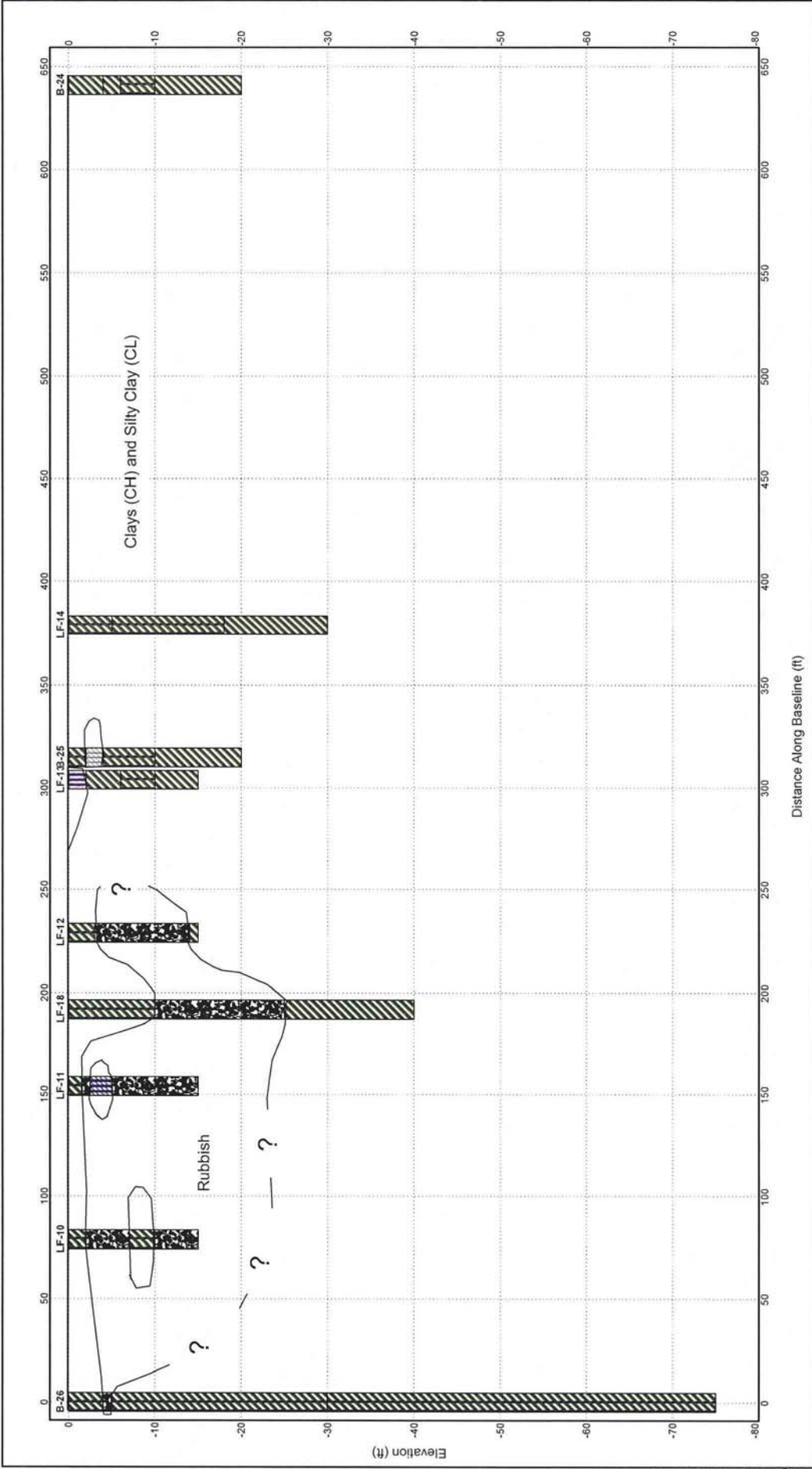


Figure 4

Geotechnical Investigation  
 Central Consolidated Force Main  
 South of Interstate 10

Project Number: EH097303

LITHOLOGY GRAPHICS

- High Plasticity Clay (CH)
- Very Silty Clay (CL-ML)
- Silty Clay (CL)
- Rubbish
- Clayey Silt (ML)
- Sandy Silt (ML)



**APPENDIX A**

**Soil Boring Logs**



PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

**SOIL BORING LOG**  
**No. B-25**

FILE: EH097303  
 DATE: April 10, 2010  
 DRILLER: R. Warren  
 TECH.: B. Alexander  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

SHEET 1 OF 1

FIELD DATA			LABORATORY DATA						Location: See Figure 2		Soil Type		
Depth (feet)	Samples	Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits				Plasticity Index	Strata Break Elev.
					Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit			
											PI	Lat: 30° 25' 21.1" N Long: 91° 08' 47.5" W	Soil Type
												Surface Elevation (Ft): 0	
												<b>DESCRIPTION</b>	Soil Type
												Stiff to very stiff brown <b>SILTY CLAY (CL)</b> - with asphalt and gravel	
			3.00 (P)	0.79	123	103					4	Firm brown and light gray <b>very SILTY CLAY (CL-ML)</b> - dry, with glass and debris	Soil Type
5			1.50 (P)									Firm tan and light gray <b>SILTY CLAY (CL)</b>	
			0.25 (P)	0.81	122	96							Soil Type
			0.50 (P)										
10			1.75 (P)									Very stiff tan and light gray <b>CLAY (CH)</b>	Soil Type
			2.25 (P)	2.27	129	106					35		
15			2.50 (P)										Soil Type
20												<b>Boring Terminated at 20 Feet.</b>	
25													Soil Type
Groundwater Level Data			Advancement Method						Notes			Soil Type	
▽ First encountered at 11 feet. ▽ Rise to 10.4 feet after 20 minutes.			Short-flight Auger: 0' - 20'										Soil Type
			Abandonment Method									Soil Type	
			Boring backfilled with soil cuttings upon completion.										Soil Type
											STRATA BOUNDARIES MAY NOT BE EXACT		
													Soil Type

AQ LOG W/O LAT AND LONG SLOGS:EH095278\_12-23-10.GPJ\_AQUATERR.GDT 2/3/11



PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

**SOIL BORING LOG**  
**No. B-26**

FILE: EH097303  
 DATE: April 10, 2010  
 DRILLER: R. Warren  
 TECH.: B. Alexander  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

SHEET 1 OF 4

Location: See Figure 2  
 Lat: 30° 25' 23.4" N Long: 91° 09' 45.6" W  
 Surface Elevation (Ft): 0

FIELD DATA			LABORATORY DATA						Plasticity Index	DESCRIPTION	Strata Break Elev.	Soil Type	
Depth (feet)	Samples	Groundwater Level	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits						
				Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit	PI			
		2.00 (P)					13					Stiff to very stiff brown <b>SILTY CLAY (CL)</b> - with gravel to 2' - dry	
		2.25 (P)		127	104		23						
5												<b>RUBBISH</b>	-4.0 -5.0
		1.25 (P)					23 24	36	1	13		Firm gray and tan <b>SILTY CLAY (CL)</b> - with rubbish to 8'	
10		0.50 (P)	0.70	125	97		29						
		0.75 (P)											
15		1.25 (P)	1.82	129	105		17 22	39	1	22		- stiff from 14' - 28'	
		2.50 (P)											
20		3.00 (P)											
25													

STRATA BOUNDARIES MAY NOT BE EXACT

Groundwater Level Data

- ▽ First encountered at 4 feet.
- ▽ Rise to 3.5 feet after 20 minutes.

Advancement Method

Short-flight Auger: 0' - 10'  
 Rotary Wash: 10' - 75'

Abandonment Method

Boring backfilled with cement-bentonite grout upon completion.

Notes



AQ LOG W/O LAT AND LONG SLOGS:EH095278\_12-23-10.GPJ\_AQUATERR.GDT\_2/3/11

PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

### SOIL BORING LOG

FILE: EH097303  
 DATE: April 10, 2010  
 DRILLER: R. Warren  
 TECH.: B. Alexander  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

No. B-26  
 SHEET 2 OF 4

FIELD DATA				LABORATORY DATA						Location: See Figure 2		Strata Break Elev.	Soil Type
Depth (feet)	Samples	Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits			Plasticity Index		
					Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit			
30			1.75 (P)	0.97	127	100		26				Firm gray and tan <b>SILTY CLAY (CL)</b> - with rubbish to 8' (continued)	
35			3.25 (P)									Stiff light gray and tan <b>SILTY CLAY (CL)</b> - blocky to 45'	
40			3.00 (P)										
45			3.50 (P)	1.50	126	101		20 25	44		24		
50			3.00 (P)										

AQ LOG W/O LAT AND LONG SLOGS:EH095278\_12-23-10.GPJ AQUATERR.GDT 2/3/11

**Groundwater Level Data**

- ▽ First encountered at 4 feet.
- ▽ Rise to 3.5 feet after 20 minutes.

**Advancement Method**

Short-flight Auger: 0' - 10'  
 Rotary Wash: 10' - 75'

**Abandonment Method**

Boring backfilled with cement-bentonite grout upon completion.

**Notes**

STRATA BOUNDARIES MAY NOT BE EXACT



PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

### SOIL BORING LOG

FILE: EH097303  
 DATE: April 10, 2010  
 DRILLER: R. Warren  
 TECH.: B. Alexander  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

No. B-26

SHEET 3 OF 4

FIELD DATA			LABORATORY DATA					Location: See Figure 2		Strata Break Elev.	Soil Type			
Depth (feet)	Samples	Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits				Plasticity Index		
					Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit				
											PI	Lat: 30° 25' 23.4" N Long: 91° 09' 45.6" W Surface Elevation (Ft): 0		
												<b>DESCRIPTION</b>		
												Stiff light gray and tan <b>SILTY CLAY (CL)</b> - blocky to 45' (continued)		
55			3.50 (P)											
60			3.00 (P)											
65			2.00 (P)	2.28	130	108		17 21	37		20	- very stiff, trace sand below 63'		
70			2.25 (P)											
75			2.50 (P)											

AQ LOG W/O LAT AND LONG SLOGS:EH095278\_12-23-10.GPJ AQUATERR.GDT 2/3/11

Groundwater Level Data		Advancement Method		Notes
▽ First encountered at 4 feet. ▽ Rise to 3.5 feet after 20 minutes.		Short-flight Auger: 0' - 10' Rotary Wash: 10' - 75'		
		Abandonment Method		
		Boring backfilled with cement-bentonite grout upon completion.		

STRATA BOUNDARIES MAY NOT BE EXACT -75.0



PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

### SOIL BORING LOG


FILE: EH097303  
 DATE: April 9, 2010  
 DRILLER: R. Warren  
 TECH.: A. Lyons  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

No. B-27  
 SHEET 1 OF 4

FIELD DATA			LABORATORY DATA						Location: See Figure 2		Soil Type
Depth (feet)	Samples Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits			Plasticity Index	
				Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit		
		4.00 (P)	3.64	125	109		21	40		19	Very stiff brown <b>SILTY CLAY (CL)</b> - dry - with gravel and asphalt
	▽	4.00 (P)									
5											<b>RUBBISH</b>
		4.00 (P)	1.86	128	104		20	40		20	Stiff brown, tan, and gray <b>SILTY CLAY (CL)</b> - with trace sand
		0.50 (P)									Soft tan <b>SILTY CLAY (CL)</b>
10											
		0.25 (P)	0.32 (t)	115	88					31	
		1.00 (P)									Firm to stiff tan <b>SILTY CLAY (CL)</b>
15											
		2.00 (P)	1.94	127	103		16	66		50	Stiff tan and light gray <b>CLAY (CH)</b>
20											
		2.50 (P)									
25											

AQ LOG W/O LAT AND LONG SLOGS.EH095278\_12-23-10.GPJ AQUATERR.GDT 2/3/11

Groundwater Level Data		Advancement Method		Notes	
▽ First encountered at 4 feet. No rise was observed after 20 minutes.		Short-flight Auger: 0' - 10' Rotary Wash: 10' - 75'			
		Abandonment Method			
		Boring backfilled with cement-bentonite grout upon completion.			

STRATA BOUNDARIES MAY NOT BE EXACT

PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

## SOIL BORING LOG

### No. B-27

FILE: EH097303  
 DATE: April 9, 2010  
 DRILLER: R. Warren  
 TECH.: A. Lyons  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

SHEET 2 OF 4

FIELD DATA			LABORATORY DATA						Location: See Figure 2		Soil Type
Depth (feet)	Samples	Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits			
					Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit	
Lat: 30° 25' 26.4" N Long: 91° 09' 43.7" W Surface Elevation (Ft): 0											
DESCRIPTION											
										Stiff tan and light gray <b>CLAY (CH)</b> (continued)	
30			3.00 (P)								
35			2.50 (P)	1.92 (s)	122	96				- slickensided from 33' - 35'	
40			3.50 (P)								
45			3.50 (P)								
50			3.00 (P)	2.17	125	100		21 25	48	Very stiff tan and light gray <b>SILTY CLAY (CL)</b> - with trace sand to 60'	
-45.0											
STRATA BOUNDARIES MAY NOT BE EXACT											
Groundwater Level Data				Advancement Method				Notes			
<input checked="" type="checkbox"/> First encountered at 4 feet. No rise was observed after 20 minutes.				Short-flight Auger: 0' - 10' Rotary Wash: 10' - 75'				<div style="text-align: center; font-size: 2em; font-weight: bold; color: red;">Terracon</div>			
				Abandonment Method							
				Boring backfilled with cement-bentonite grout upon completion.							

AQ LOG W/O LAT AND LONG SLOGS:EH095278\_12-23-10.GPJ\_AQUATERR.GDT: 2/3/11

PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

**SOIL BORING LOG**  
**No. B-27**

FILE: EH097303  
 DATE: April 9, 2010  
 DRILLER: R. Warren  
 TECH.: A. Lyons  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

SHEET 3 OF 4

FIELD DATA			LABORATORY DATA						Location: See Figure 2		Strata Break Elev.	Soil Type
Depth (feet)	Samples	Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits				
					Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit		
											Lat: 30° 25' 26.4" N Long: 91° 09' 43.7" W Surface Elevation (Ft): 0	
											<b>DESCRIPTION</b>	
											Very stiff tan and light gray <b>SILTY CLAY (CL)</b> - with trace sand to 60' (continued)	
55			2.50 (P)									
60			4.00 (P)	2.20	127	104		23				
65			3.00 (P)									
70			4.00 (P)					26				
75			4.00 (P)									
											-75.0	
											<small>STRATA BOUNDARIES MAY NOT BE EXACT</small>	
Groundwater Level Data				Advancement Method				Notes				
▽ First encountered at 4 feet.  No rise was observed after 20 minutes.				Short-flight Auger: 0' - 10' Rotary Wash: 10' - 75'				<div style="text-align: center; font-size: 2em; font-weight: bold; color: red;">Terracon</div>				
				Abandonment Method								
				Boring backfilled with cement-bentonite grout upon completion.								

AQ LOG W/O LAT AND LONG SLOGS:EH095278\_12-23-10.GPJ AQUATERR.GDT 2/3/11

PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

## SOIL BORING LOG

### No. B-27

FILE: EH097303  
 DATE: April 9, 2010  
 DRILLER: R. Warren  
 TECH.: A. Lyons  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

SHEET 4 OF 4

FIELD DATA				LABORATORY DATA						Location: See Figure 2		Strata Break Elev.	Soil Type
Depth (feet)	Samples Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits			Plasticity Index	Surface Elevation (Ft): 0		
				Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit				
											DESCRIPTION		
Boring Terminated at 75 Feet.													
<div style="display: flex; justify-content: space-between;"> <span>80</span> <span>85</span> <span>90</span> <span>95</span> <span>100</span> </div>											STRATA BOUNDARIES MAY NOT BE EXACT		
Groundwater Level Data				Advancement Method				Notes					
<input checked="" type="checkbox"/> First encountered at 4 feet.  No rise was observed after 20 minutes.				Short-flight Auger: 0' - 10' Rotary Wash: 10' - 75'									
				Abandonment Method									
				Boring backfilled with cement-bentonite grout upon completion.									

AQ LOG W/O LAT AND LONG SLOGS:EH095278\_12-23-10.GPJ AQUATERR.GDT 2/3/11





PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

**SOIL BORING LOG**  
**No. B-29**

FILE: EH097303  
 DATE: April 10, 2010  
 DRILLER: R. Warren  
 TECH.: B. Alexander  
 ENGINEER: S. Greaber

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

SHEET 1 OF 1

Location: See Figure 2  
 Lat: 30° 25' 32.5" N Long: 91° 08' 40.4" W  
 Surface Elevation (Ft): 0  
**DESCRIPTION**  
 Strata Break Elev.  
 Soil Type

FIELD DATA			LABORATORY DATA									
Depth (feet)	Samples	Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)		Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits			Plasticity Index
				Moist	Dry	Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit	
			2.50 (P)						14			
			2.50 (P)	1.78	127	102			19	53	24	34
5			1.75 (P)									
			1.00 (P)	1.84	128	104			24			
			0.75 (P)									
10			0.50 (P)	0.83	124	99			20	33	25	13
			1.25 (P)	1.18	124	101			23			
			2.25 (P)									

Stiff to very stiff tan and light gray **SILTY CLAY (CL)**  
 - very dry  
 - with gravel  
 -2.0

Stiff tan and brown **CLAY (CH)**  
 - gray and tan below 6'  
 -8.0

Firm tan and gray **SILTY CLAY (CL)**  
 -13.0

Stiff tan and light gray **SILTY CLAY (CL)**  
 -20.0

Boring Terminated at 20 Feet.

STRATA BOUNDARIES MAY NOT BE EXACT

AQ LOG W/O LAT AND LONG SLOGS:EH095278\_12-23-10.GPJ\_AQUATERR.GDT\_2/3/11

Groundwater Level Data  
 ▽ First encountered at 14 feet.  
 ▽ Rise to 13.5 feet after 20 minutes.

Advancement Method  
 Short-flight Auger: 0' - 20'

Abandonment Method  
 Boring backfilled with soil cuttings upon completion.

Notes



PROJECT: Geotechnical Investigation  
 Central Consolidated Force Main  
 Baton Rouge, Louisiana

### SOIL BORING LOG

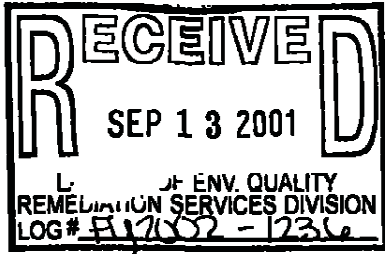
FILE: EH097303  
 DATE: December 14, 2010  
 DRILLER: J. Grissom  
 TECH.: A. Kiehn  
 ENGINEER: L. Smith

CLIENT: Shread-Kuyrkendall & Associates, Inc.  
 Baton Rouge, Louisiana

No. LF-01  
 SHEET 1 OF 1

FIELD DATA			LABORATORY DATA						Location: See Figure 2.				
Depth (feet)	Samples	Groundwater Level	Field Test Results	Undrained Shear Strength (ksf)	Unit Weight (pcf)		PID	Natural Moisture Content and Atterberg Limits			Plasticity Index	DESCRIPTION	Soil Type
					Moist	Dry		Plastic Limit	Moisture Content	Liquid Limit			
								20	37	80	17	Light gray and tan <b>SILTY CLAY (CL)</b> - dry to 2'	
5													
10								23	30	76	7	Brown and gray <b>CLAYEY SILT (ML)</b>	-8.0
15												Tan and light gray <b>SILTY CLAY (CL)</b> - wet	-11.0
20								15	23	56	41	Tan and gray <b>CLAY (CH)</b>	-18.0
25													
30								24	31	76	52		
35													-35.0
Boring Terminated at 35 Feet.													
<small>STRATA BOUNDARIES MAY NOT BE EXACT</small>													
Groundwater Level Data			Advancement Method						Notes				
▽ First encountered at 13.5 feet. ▽ Rise to 18.9 feet after 15 minutes. ▽ Static level observed at 13.8 feet.			Direct Push: 0' - 35'						3-inch topsoil Analytical Sample taken from 12' to 14'				
			Abandonment Method						<h1>Terracon</h1>				
			Boring backfilled with cement-bentonite grout upon completion.										

AQ LOG W/O LAT AND LONG SLOGS EH095278\_12-23-10.GPJ\_AQUATERR.GDT\_2/3/11



URS Corporation  
600 Carondelet St.  
New Orleans, LA 70130-3587  
Tel: 504.586.8111  
Fax: 504.599.5181  
www.urscorp.com

### Letter of Transmittal

T-17

Louisiana Department of Environmental Quality  
7290 Bluebonnet Boulevard  
Baton Rouge, LA 70810

Date: September 10, 2001

Job No.: 25723-036  
CFIS# 33815

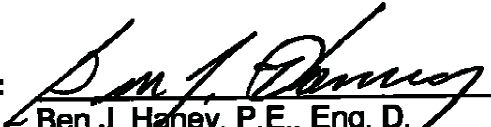
Attention: Mr. Keith Casanova  
Administrator, Remediation Services Division

GENTLEMEN:

WE FURNISH YOU HEREWITH THE FOLLOWING:

DESCRIPTION	COPIES	NUMBER	TITLE	REV. NO.	REV. DATE
Report	3		Voluntary Remediation Program, Remediation Action Summary Report for 8006 Jefferson Highway, Baton Rouge, Louisiana.		

Remarks: CFIS# 33815. Document for LDEQ review and approval. One copy should be forwarded to Mr. Carey Dicharry (LDEQ Site Coordinator).

BY:   
Ben J. Haney, P.E., Eng. D.  
Vice President  
Manager, Environmental Services

BJH/GJH/mfm



Remediation Services Division	
Manager:	<u>Bradford</u>
Team Leader:	<u>Dicharry</u>
AI #:	<u>33815</u>
TEMPO Task #:	_____
<input type="checkbox"/> Desk Copy	File Room: <u>GW</u>

**VOLUNTARY REMEDIATION PROGRAM  
REMEDIAL ACTION SUMMARY REPORT**

**FOR**

**8006 JEFFERSON HIGHWAY  
BATON ROUGE, LOUISIANA**

<i>Remediation Services Division</i>	
Manager:	<i>Bradford</i>
Team Leader:	<i>Dickens</i>
AI #:	<i>3385</i>
TEMPO Task #:	
<input type="checkbox"/> Desk Copy	File Room: <i>AW</i>

<b>R</b>	<b>CEIVED</b>	<b>D</b>
SEP 13 2001		
OF ENV. QUALITY REMEDIAL SERVICES DIVISION LOG# <i>FY2002-1236</i>		

**WHITNEY NATIONAL BANK  
NEW ORLEANS, LOUISIANA**

**URS JOB NO. 25723-036  
SEPTEMBER 2001**

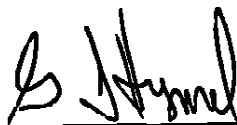
**VOLUNTARY REMEDIATION PROGRAM  
REMEDIAL ACTION SUMMARY REPORT**

**FOR**

**8006 JEFFERSON HIGHWAY  
BATON ROUGE, LOUISIANA**

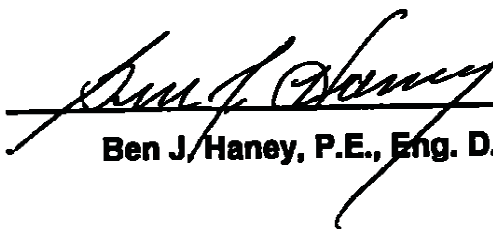
**WHITNEY NATIONAL BANK  
NEW ORLEANS, LOUISIANA**

**Prepared By:**



**G. J. Hymel, P.G**

**Reviewed and  
Approved By:**



**Ben J. Haney, P.E., Eng. D.**

**JOB NO. 25723-036  
SEPTEMBER 2001**

**WHITNEY NATIONAL BANK  
NEW ORLEANS, LOUISIANA**

**JOB NO.: 25723-036**

**VOLUNTARY REMEDIATION PROGRAM  
REMEDIAL ACTION SUMMARY REPORT  
FOR  
8006 JEFFERSON HIGHWAY  
BATON ROUGE, LOUISIANA**

**SEPTEMBER 2001**

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**D PIEZOMETER PLUGGING AND ABANDONMENT FORM**

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## 1.0 INTRODUCTION



## 1.0 INTRODUCTION

Whitney National Bank (Whitney) of New Orleans, Louisiana currently owns a 4.042-acre tract of land on Jefferson Highway in Baton Rouge, Louisiana (Site). Refer to Figure 1 of Appendix A. In 1997, apparently impacted soils were encountered in the subsurface at the Site. Subsequently, the Whitney performed several environmental investigations and evaluations related to the Site. These evaluations indicated that constituents typical of dry cleaning operations were identified in the subsurface soils and groundwater at the Site. Figure 2, Appendix A, depicts a Site plot plan with locations sampled during the Site investigation activities.

On January 24, 2001, Whitney and the Louisiana Department of Environmental Quality (LDEQ) entered into a Voluntary Remedial Remedial Action Cooperative Agreement and a Partial Remediation Agreement under the Voluntary Remediation Program (VRP) to manage the Site. The VRP provides that partial remedial actions at the Site may be employed where such actions are consistent with the proposed re-use or development of the property, are protective of human health and the environment and allow for Site access by LDEQ. Under the terms of the Partial Remediation Agreement, Whitney must also impose use restrictions on the future use of the site and submit to LDEQ for approval a Monitoring Maintenance Plan (MMP), which shall be incorporated into the use restrictions.

Prior to initiation of remedial actions at the Site, the document entitled *Remedial Action Plan and Confirmatory Sampling and Analysis Plan for 8006 Jefferson Highway, Baton Rouge, Louisiana* dated January, 2001 (RAP/SAP), was developed by URS Corporation (URS) and submitted to the LDEQ on January 24, 2001 for review and comment. On February 19, 2001 and March 8, 2001, at the request of LDEQ, two addenda to the RAP/SAP were issued. On May 11, 2001, after solicitation of public comments on the RAP/SAP document, the LDEQ provided approval to initiate the RAP/SAP activities at the Site.

In August of 2001, URS implemented the approved RAP/SAP and completed the partial remedial actions at the Whitney Site. The objective of the remedial actions were to remove and dispose of those Site soils that contain tetrachloroethylene (PCE) concentrations above the Risk Evaluation/Corrective Action Program (RECAP), Management Option 2 (MO-2) Non-Industrial Limiting RECAP Standard for Surface Soil and Potential Surface Soil (Soil<sub>NI</sub>) [henceforth MO-2 RS], as presented in the LDEQ approval RAP/SAP. To facilitate remedial actions, one Site piezometer (PZ-16) was plugged and abandoned, due to the need to excavate and remove adjacent soils exceeding the MO-2 RS.

This Remedial Action Summary Report (RASR) document provides a summary of the remedial actions and confirmatory sampling activities performed at the Site in August of 2001, and also provides a comparison of the confirmatory sampling analytical data to the MO-2 RS.

The results of the confirmatory sampling activities presented herein indicate that the MO-2 RS have been achieved. Therefore, pending resolution of any use restriction issues, a Certificate of Completion from the LDEQ under the VRP is warranted.

## 2.0 REMEDIAL ACTIONS

## **2.0 REMEDIAL ACTIONS**

URS contracted with Safety Kleen, Inc. (Safety Kleen) to excavate, remove and dispose of Site soils with PCE concentrations greater than the MO-2 RS. The excavated materials were disposed of off-site at the Safety Kleen facility in White Castle, Louisiana. A total of 498 tons of materials was disposed. Refer to Appendix C for Waste Manifests. Field activities were conducted between August 1 and August 17, 2001, in accordance with the Site-Specific Health and Safety Plan developed for the Site remedial activities. The remedial actions addressed the soils in the vicinity of the following previous sampling locations:

- SB-4 (2 - 4'),
- SB-4 (9 - 11'),
- SB-24 (6 - 9'),
- SS-1 (2'), and
- SS-6 (10').

Excavation was performed using typical excavation equipment. Excavated soils were removed and placed into dump trucks or roll off boxes and transported to the disposal facility. Excavation was performed until soils with PCE concentrations above the MO-2 RS were excavated. Termination of excavation was determined based upon existing Site data, field observations and ultimately the results of confirmatory samples collected from the excavation areas.

The extent of soils that were excavated, removed and disposed is depicted on Figure 3, Appendix A. The depth of excavation was 15 feet below ground surface (bgs) or greater. Descriptions of the excavation areas are as follows:

### Area 1

The Area 1 excavation area encompassed sample location SB-24. The excavation measured approximately 20 feet by 14 feet by 15 feet deep.

### Area 2

The Area 2 excavation area encompassed sample locations SB-4 and SS-1. The excavation measured approximately 26 feet by 12 feet by 15 to 16.5 feet deep. Area 2 encompassed piezometer PZ-16, which was plugged and abandoned, and subsequently removed by excavation to a depth of 12 feet bgs. The southeastern end of Area 2 terminated, and joined with, Area 3.

### Area 3

The Area 3 excavation area encompassed sample location SS-6. The excavation measured approximately 10 feet by 10 feet by 15 feet deep. The western end of Area 3 terminated at piezometer PZ-16. Area 3 was merged with excavation Area 2 by the additional excavation performed in Area 2.

Confirmatory sampling of the open excavations was performed after the URS field team leader believed soils containing PCE above MO-2 RS were removed (see Section 3.0 for more details concerning field sampling activities). At the end of each day, excavated areas were covered with plastic sheeting and remained open until confirmatory analytical results were evaluated. After analytical results of confirmatory samples were evaluated, either additional excavation was performed in areas which contained soils with PCE concentrations above the MO-2 RS, or the excavations were backfilled. Initial confirmatory sampling results required that additional excavation be performed in two locations, prior to backfilling activities as follows: 1) at the western end of Area 3 (southeastern portion of Area 2) near PZ-16, and 2) at the western end of Area 1. Backfill consisted of clean soil from Jenkins dirt pit, located on Jewel Road, Baton Rouge, Louisiana. A total of 550 cubic yards of backfill was placed at the Site.

Remedial actions in the vicinity of Site PZ-16 required that soils surrounding this piezometer be removed. To facilitate the removal and disposal of the surrounding soils, URS contracted Professional Technical Support Services, Inc. (Pro-Tech) to plug and abandon (P&A) piezometer PZ-16. Prior initiation of P&A activities, verbal approval to

P&A piezometer PZ-16, as well as for the methods to be utilized, were obtained from Mr. Carey Dichary of the LDEQ. On August 7, 2001, Pro-Tech plugged PZ-16 with a cement-bentonite grout from the bottom of the well to ground surface.

On August 15, 2001, the soils surrounding PZ-16, were excavated by Safety Kleen down to approximately 8 feet bgs, and the well was broken off using the excavator bucket, at approximately 8 feet bgs, just below the 17.25-inch diameter outer steel casing. On August 16, 2001 the soils surrounding PZ-16, were excavated down to 15 feet bgs, and the outer PVC casing was broken off at approximately 15 feet bgs. The stainless steel well casing was disconnected at a joint at approximately 12 feet bgs. On August 17 the area of PZ-16 was backfilled to approximate the previous ground surface elevation. Refer to Appendix D for a copy of the well P&A form.



URS Corporation  
 600 Carondelet St.  
 New Orleans, LA 70130-3587  
 Tel: 504.586.8111  
 Fax: 504.599.5181  
 www.urscorp.com

**Letter of Transmittal**

T-8

Louisiana Department of Environmental Quality  
 7290 Bluebonnet Blvd.  
 Baton Rouge, LA 70810

Date: January 24, 2001  
 Job No.: 01518  
 CFIS # 33815

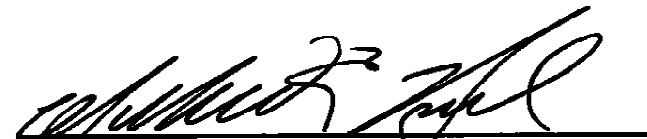
Attention: Mr. Keith Casanova  
 Administrator, Remediation Service Division

LADIES/GENTLEMEN:

WE FURNISH YOU HERewith THE FOLLOWING:

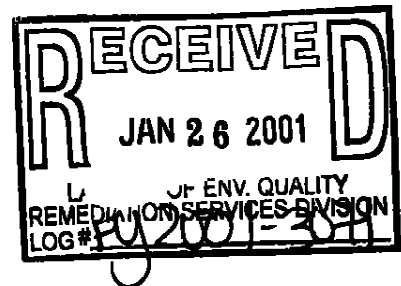
DESCRIPTION	COPIES	NUMBER	TITLE	REV. NO.	REV. DATE
Reports	3		Remedial Action Plan and Confirmatory Sampling and Analysis Plan for 8006 Jefferson Highway, Baton Rouge, Louisiana		

Remarks: CFIS# 33815. Document for LDEQ review and approval. One copy should be forwarded to Mr. Carey Dicharry (LDEQ Site Coordinator).

BY:   
 Michael E. Neal, Q.E.P., R.E.P.  
 Program Manager

MEN/ko

Remediation Services Division	
Manager:	<u>Christy</u>
Team Leader	<u>Dicharry</u>
AI #:	
TEMPO Task #:	<u>33815</u>
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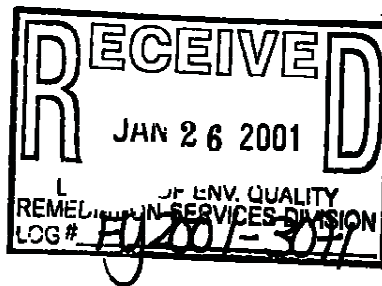
**REMEDIAL ACTION PLAN  
AND  
CONFIRMATORY SAMPLING AND ANALYSIS PLAN**

**FOR**

**8006 JEFFERSON HIGHWAY  
BATON ROUGE, LOUISIANA**

**WHITNEY NATIONAL BANK  
NEW ORLEANS, LOUISIANA**

<i>Remediation Services Division</i>	
Manager:	<u>Christy</u>
Team Leader:	<u>Dickaluy</u>
AI #:	<u>33815</u>
TEMPO Task #	_____
<input type="checkbox"/> Desk Copy	<input type="checkbox"/> File Room <u>GW</u>



**URS TASK NO. 01518**

**January 2001**

**URS**

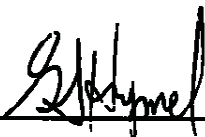
Walk Haydel



**REMEDIAL ACTION PLAN  
AND  
CONFIRMATORY SAMPLING AND ANALYSIS PLAN  
FOR  
8006 JEFFERSON HIGHWAY  
BATON ROUGE, LOUISIANA**

**WHITNEY NATIONAL BANK  
NEW ORLEANS, LOUISIANA**

**Prepared By:**



**G. J. Hymel, P.G**

**Prepared and  
Reviewed By:**



**Michael E. Neal, Q.E.P., P.E.**

**Reviewed and  
Approved By:**



**Ben J. Haney, P.E., Eng. D.**

**URS TASK NO. 01518  
January 2001**



Walk Haydel

**WHITNEY NATIONAL BANK  
NEW ORLEANS, LOUISIANA**

**January 2001**

**URS Task No. 01518**

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**REMEDIAL ACTION PLAN  
AND  
CONFIRMATORY SAMPLING AND ANALYSIS PLAN  
FOR  
8006 JEFFERSON HIGHWAY  
BATON ROUGE, LOUISIANA**

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- 2.0 SUMMARY OF SITE INVESTIGATIONS**
- 3.0 RECAP EVALUATION**
  - 3.1 Impacts to Site Soil**
  - 3.2 Impacts to Site Groundwater**
- 4.0 PROPOSED REMEDIAL ACTIONS**
- 5.0 FIELD SAMPLING ACTIVITIES**
- 6.0 LABORATORY ACTIVITIES**
- 7.0 EVALUATION OF DATA**

**APPENDIX A      FIGURES**

Figure 1 Site Vicinity Map

Figure 2 Site Plot Plan with Sampling Locations

Figure 3 Proposed Excavation Areas

**APPENDIX B      AGENCY CORRESPONDENCE**

LDEQ correspondence dated October 19, 2000

**APPENDIX C      SITE-SPECIFIC HEALTH AND SAFETY PLAN**

**1.0 INTRODUCTION**

## **1.0 INTRODUCTION**

Whitney National Bank (Whitney) of New Orleans, Louisiana currently owns a 4.042-acre tract of land on Jefferson Highway in Baton Rouge, Louisiana (Site). Refer to Figure 1 of Appendix A. The Whitney currently plans to develop the Site for various uses as discussed below. During pre-construction activities in 1997, apparently impacted soils were encountered in the subsurface. Subsequently, the Whitney has performed several environmental investigations and evaluations related to the Site. These evaluations indicated that constituents typical of dry cleaning operations were identified in the subsurface soils and groundwater at the Site. The Whitney has held several meetings with the Louisiana Department of Environmental Quality (LDEQ) to discuss the status of activities at the Site. Based on the results of the Site investigation activities, the LDEQ has concurred that the delineation of soil and groundwater impacts has been accomplished at the Site.

Whitney and LDEQ have agreed to enter into a cooperative agreement under the Voluntary Cleanup Program (VCP) to manage the Site. The VCP provides that partial remedial actions at a given site may be employed where such actions are consistent with the proposed reuse or development of the property, is protective of human health and the environment and allows for Site access by LDEQ. LDEQ has also agreed that a partial remedial action is appropriate for the Site.

The Whitney plans to develop the Site in a manner that is consistent with the proposed VCP provisions. The Site development could include the following:

- A banking center and / or other commercial office space at the north – northwest section of the Site. It is envisioned that this portion of the development would consist of a building(s), parking areas, access to parking areas and "green" space. At present, it is envisioned that a building would be constructed at the north - northwest portion of the Site. The area of the former dry cleaning building would become either green space or be dedicated to parking or access; and

- The rear (west) portion of the Site may be used for multi-family residential dwellings. This portion of the property is undeveloped and unaffected by prior Site developments.

This Remedial Action Plan and Sampling and Analysis Plan (RAP/SAP) is intended to provide an overview of the proposed soil excavation and disposal actions to be undertaken at the Site and the procedures for confirmatory sampling of soils at the Site subsequent to excavation. Excavation is to take place at Site locations, as specified in this document, which have been shown to contain constituent concentrations above LDEQ Risk Evaluation/Corrective Action Program (RECAP) (dated June 20, 2000) Management Option 2 (MO-2) non-industrial remediation standards. To support these activities, the results of a previous MO-2 evaluation for the Site have been included in this document. The objective of the confirmatory sampling program will be to determine if constituents remaining on the Site are below MO-2 standards.

## 2.0 SUMMARY OF SITE INVESTIGATIONS

## **2.0 SUMMARY OF SITE INVESTIGATIONS**

Several stages of investigations have been conducted at the Site and the adjacent property (8026 Jefferson Highway), between October 1997 and September 2000. A summary of pertinent information from the investigations conducted through March 1999 is provided in the document entitled *Evaluation of Site Data With Regard To The LDEQ Voluntary Cleanup Program, 7976 and 8006 Jefferson Highway, Baton Rouge Louisiana*, dated April 2000. A summary of the most recent investigation (conducted in September 2000) is provided in a letter report dated September 21, 2000. The following sections provide a brief summary of the Site investigation activities. Figure 2, Appendix A, depicts a plot plan of the Site with the various sampling locations.

CRA/G&E Engineering (CRA) performed several stages of site investigations in 1997 and 1998 at the Site. Results of these investigations are summarized in a CRA report (dated October 1998) and indicate that constituents typical of dry cleaning operations are present in soils and groundwater at the Site. The constituents detected include tetrachloroethylene (PCE), trichloroethylene (TCE), 1,2-dichloroethylene and vinyl chloride. Trenching was performed to determine whether the former dry cleaning establishment discharged its effluent to the city of Baton Rouge sanitary sewer system. A connection from the former dry cleaners building foundation and the main sewer line could not be found. However, a septic tank and leach field were encountered.

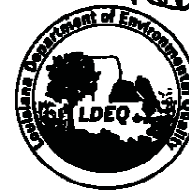
In September 2000, URS Corporation - Walk Haydel (URS) conducted an investigation to complete the delineation of the extent of groundwater impacts on the Site. Based on the results of this investigation, it was concluded that groundwater impacts on the Site are delineated and that no further site investigation activities are necessary. The LDEQ has concurred with this determination (refer to Appendix B, LDEQ correspondence dated October 19, 2000).





# State of Louisiana

## Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

J. DALE GIVENS  
SECRETARY

October 18, 2001

Mr. Michael P. Pou  
Vice President  
Corporate Real Estate  
Whitney National Bank  
Post Office Box 61260  
New Orleans, Louisiana 70161

RE: Acceptance of VRP Remedial Action Summary Report  
Agency Interest Name; AI Number 33815  
8006 Jefferson Highway, Baton Rouge, Louisiana  
East Baton Rouge Parish

Dear Mr. Pou :

The Environmental Technology Division of the Louisiana Department of Environmental Quality (ETD-LDEQ) has reviewed the Remedial Action Summary Report outlining the corrective action activities completed at the referenced site. Based on our review of the confirmatory sampling results and witness of the excavation activities performed at the site, the summary report is accepted as complete and in compliance with the Voluntary Remediation Program. In addition to the summary report, the ETD-LDEQ has reviewed and approves the Monitoring and Maintenance Plan (MMP) which will assure that the ground surface remains intact and that no unauthorized development is undertaken on the subject property.

Whitney Bank is authorized to plug and abandon the existing monitoring wells on the subject site. Please forward copies of the Louisiana Department of Transportation and Development monitor well plugging and abandonment forms to my attention upon completion of field activities.



recycled paper



Mr. Michael P. Pou  
October 18, 2001  
Page 2

If you have any questions concerning this site, please contact me at 225-765-0624.  
Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. J. Dicharry, Jr.', written in a cursive style.

Carey J. Dicharry, Jr., Geologist  
Environmental Technology Division

cjd

cc: Tim Knight, Administrator  
GW Fileroom

ID 12464

CEI   
CSI   
Complaint   
Spill   
Other

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF WATER RESOURCES  
WATER POLLUTION CONTROL DIVISION

WG-08041  
File Location

Log # Reference

FACILITY INSPECTION FORM

INSPECTION DATE: 100595 TIME IN: 0850  
COMPANY NAME: Florida Street Carwash, Inc.  
FACILITY NAME: Benny's Carwash - Essen Lane  
TYPE OF FACILITY: Car wash PHONE #: (504) 769-3911  
COMPANY ADDRESS: 5235 Essen Ln, Br, LA 70809  
FACILITY REPRESENTATIVE: Ben Alford TITLE: Owner  
FACILITY LOCATION: 5235 Essen Ln, B.R.  
Region 8421 PARISH: EBR (17) BASIN/SEGMENT: 04/02 Basin  
PERMIT #'S: NPDES: \_\_\_\_\_ LWDPS: WG-08041 GP: \_\_\_\_\_

EFFLUENT S OPERATION & MAINTENANCE S SAMPLING PROCEDURES NE  
RECORDS AND REPORTS S COMPLIANCE SCHEDULE N/A LABORATORY PRACTICES NE  
PERMIT VERIFICATION m FLOW MEASUREMENTS NE OTHER \_\_\_\_\_

INSPECTOR'S OBSERVATIONS, PROBLEMS, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES:

The following observations were made:  
1) The facility just opened the car wash in 07/95. The facility will start sampling this quarter as required by their permit.  
2) The facility's treatment system is catch basins to an oil water separator. The facility discharge to a storm drain then to Bayou Manchac.  
3) The facility will sample from the pipe before it enters the storm sewer. The effluent was clear & with out odor.

PHOTOGRAPHS TAKEN: 0 SAMPLES TAKEN: 1 FACILITY ACCEPTED SPLIT SAMPLES: N/A  
FACILITY F.I.F. COPY RECEIVED BY: SIGNATURE (X) [Signature]  
TITLE President  
TIME OUT: 0930 INSPECTOR'S SIGNATURE [Signature] BC

DEQ/OWR/WPCD-3 WHITE COPY - MAIN OFFICE PINK COPY - FACILITY REPRESENTATIVE  
(Rev. 09/01/90) YELLOW COPY - COMPLIANCE ASSURANCE SECTION GOLD COPY - REGIONAL OFFICE

*E-Right*



United States Environmental Protection Agency  
Washington, D. C. 20460

# NPDES Compliance Inspection Report

Form Approved  
OMB No 2040-0003  
Approval Expires 7-31-85

### Section A: National Data System Coding

Transaction Code 1N 25	NPDES None	yr/mo/day 11 12 9 10 4 12 7 17	Inspection Type 18C	Inspector 18S	Fac Type 202
Remarks MINOR TWA-080411					
Reserved 67	Facility Evaluation Rating 702	BI 71M	QA 72N	Reserved 73 74 75 80	

### Section B: Facility Data

Name and Location of Facility Inspected Benny's Carwash 5235 Essen Lane Baton Rouge, LA 70809		Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 0900	Permit Effective Date 9-13-94
EPR Parish		Exit Time/Date 1010 am 4-27-98	Permit Expiration Date 9-13-99
Name(s) of On-Site Representative(s) Ben Aiford Paul Bourgeois		Title(s) owner Manager	Phone No(s) (504) 927-7181
Name, Address of Responsible Official Paul Bourgeois 5235 Essen Lane Baton Rouge, LA 70809		Title Manager	Phone No. (504) 927-7181
		Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	NA	Flow Measurement	NA	Pretreatment	S	Operations & Maintenance
U	Records/Reports	M	Laboratory	NA	Compliance Schedules	NA	Sludge Disposal
S	Facility Site Review	S	Effluent/Receiving Waters	U	Self-Monitoring Program	NA	Other

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Summary of Findings: L.Pontchartrain Basin/segment 0402  
Region 8421

Records/Reports - unsatisfactory - sampled only two times in 1997.  
Not submitting DMR's

Laboratory: marginal - On chain of custody, containers, preservatives and matrix are not being listed.

Self-Monitoring program: unsatisfactory - not monitoring pH, soaps or flow

Name(s) and Signature(s) of Inspector(s) Pam Teppenhart Pam Teppenhart	Agency/Office/Telephone 765-2511 LADDER/OWR/WQMD/Surveillance	Date 4-30-98
Signature of Reviewer Bob Crain	Agency/Office L. DEQ. O.W.R. / W.Q.M.D.	Date 5-1-98
Regulatory Office Use Only		
Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

LADEQ/OWR Further Explanation Form

WB-080041  
File Location

Log # Reference

INSPECTION DATE: 4-27-98

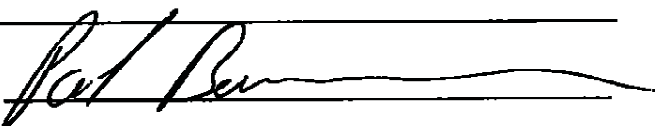
COMPANY NAME: Florida Street Carwash, Inc.

FACILITY NAME: Benny's Car Wash

A compliance evaluation inspection was conducted at the above named facility. The following observations were made during the inspection:

- 1. Permit was onsite and current.
- 2. Facility not monitoring and analyzing pH as per permit.
- 3. Facility has an oil/water separator.
- 4. Facility only sampled twice in 1997. There were not any excursions.
- 5. Facility is not submitting DMR'S.
- 6. On chain of custody, preservatives, type of containers and matrix are not being listed.

FACILITY COPY RECEIVED BY: SIGNATURE (X)



WHITE COPY - MAIN OFFICE  
YELLOW COPY - COMPLIANCE SECTION

PINK COPY - FACILITY REPRESENTATIVE  
GOLD COPY - REGIONAL OFFICE

Revised 7/1/00 ER

INCIDENT REPORT FORM

Received by: Cindy Dispatch # 007-1615 Incident # T 96326 ✓

Date Reported: 5/17/07 Time Reported: 12:25

Spill Incident/Release  Citizen Complaint  Emergency?  Yes  No Drill?  Yes  No

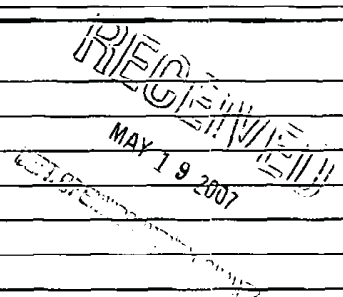
**CALLER INFORMATION:** Citizen  Industry  Anonymous Complaint   
 Other (i.e. Coast Guard): \_\_\_\_\_  
 Name/Company: Joc Wilson - BRFD Title: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Is caller requesting a follow-up call? Yes  No  Date of Caller Contact: \_\_\_\_\_  
 Telephone No. 225-571-0699 Parish (of occurrence): East Baton Rouge

**SITE INFORMATION:**  
 Company Name/ Agency Interest # \_\_\_\_\_  
 Alleged Violator: \_\_\_\_\_ Other: \_\_\_\_\_  
 Location Address: Ward's Creek - Essen Lane Baton Rouge  
 Site is Active or Inactive: \_\_\_\_\_  
 Date of discharge if different from date report: \_\_\_\_\_ Time discharge noticed: Began \_\_\_\_\_ Ended \_\_\_\_\_  
 Media Affected: Air  Land  Surface Water  Ground Water  Other   
 If water affected, name of nearest water body (Basin/Subsegment): \_\_\_\_\_  
 If air affected, note wind direction and weather conditions (if provided): \_\_\_\_\_

**DESCRIPTION OF RELEASE/SPILL/COMPLAINT:**  
 Product/material release and quantity (reported): \_\_\_\_\_  
 Product/material released and quantity (actual): \_\_\_\_\_  
 Description of release/complaint: Unknown green material in Ward's Creek - source unknown.  
 How was spill contained? Offsite Impact? \_\_\_\_\_  
 How was spilled cleaned/remediated? \_\_\_\_\_

**DIRECTIONS FOR REACHING THE SITE:** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Investigator's Comments: \_\_\_\_\_  
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 RECEIVED  
 MAY 19 2007  
 REGIONAL OFFICE

Region Assigned: CRO - Bob Gillett Summary Report: Yes  No   
 Investigator Assigned: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Investigator's Signature: \_\_\_\_\_ Reviewer's Initials & Date: \_\_\_\_\_  
 Date Closed: \_\_\_\_\_ Closed by: Site Visit  Telephone  Other: \_\_\_\_\_  
 Referred to: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

05/21/2007

## LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Page 1 of 2

## INCIDENT REPORT

Incident ID: 96326

Incident Description**Incident Type:** Complaint, Miscellaneous**Incident Date:** MAY-17-07 12:25**Parish:** East Baton Rouge**Municipality:** Baton Rouge**Location:** Ward's CreekEssen LaneBaton Rouge**Lat/Lon:****Basin/Segment:** 40201**Substance(s):****Media Impacted:** Water**Incident Desc:** c07-1615Unknown green material in Ward's Creek--source unknown...jdIncident Status**Lead Investigator:** Robert Gillett*Robert Gillett BC***Incident Region:** Capital**Incident Status:** Referred to Enforcement**Followup Status:** Referred to Enforcement**As Of:** MAY-21-2007 07:56Incident Reporter**Received By:** Cindy Lafosse**Received Date:** MAY-17-2007 12:25**Dispatch #:** c07-1615**Reported By:** Joe Wilson, Other**Phone:** 225-571-0699**Reporter Title:****Organization:** BRFD**Address:****Municipality:****State:** LA**Zip Code:****Comments:**

TPOR0022

05/21/2007

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
INCIDENT REPORT  
Incident ID: 96326

Page 2 of 2

Incident Source**Source Name:** Benney's Car Wash LLC - B Quick of Baton Rouge LLC III**Address:** 5235 Essen Ln**Municipality:** Baton Rouge**State:** LA**Phone:** 2257693571**Parish:** East Baton Rouge**AI #:** 87126**Related Permits:**

LAG750350

AOCs - Y

Receiving Waters: Bayou Manchac

**Comments:** Region 8421 Basin: 040201

The inspection was complaint # T96326 related.

1. The treatment system treats water from a car wash.
2. The facility has a permit to discharge commingled treated vehicle wash and sanitary wastewater totaling less than 25,000 gallons per day.
3. A DMR review revealed that the last DMR turned into our files was in 2001.
4. The discharge water is a green color. There was no smell, no oily sheen and no solids present.
5. Housekeeping at the facility appeared to be satisfactory at the time of the inspection.

TPOR0022



Louisiana Department of Environmental Quality  
Baton Rouge, LA 70804

# LPDES Compliance Inspection Report



### Section A: National Data System Coding

Transaction Code	LPDES	Inspection Date	Inspection Type	Inspector	Fac Type
1 N 2 5 3 L A G 7 5 0 3 5 0 11 12 0 7 0 5 1 7 17 18 C 19 S 20 2					
Remarks					
A I # 8 7 I 2 6 M I N O R					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 2	71 N	72 N	73	74 75 80

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and LPDES permit number)  Benny's Car Wash LLC 5235 Essen Ln. Baton Rouge, LA	Entry Time /Date 1445 / 05-17-2007	Permit Effective Date 03-15-2004
	Exit Time/Date 1530 / 05-17-2007	Permit Expiration Date 03-15-2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Paul Bourgeois / Staff Engineer	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Paul Bourgeois / Staff Engineer 5235 Essen Lane Baton Rouge, LA 70808 phone: (225) 253-0081	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

### Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, NE = Not Evaluated, NA = Not Applicable)

S	Permit	NE	Flow Measurement	S	Operations & Maintenance	NA	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	NA	Sludge Handling/Disposal	NE	Pollution Prevention
M	Facility Site Review	NA	Compliance Schedules	NA	Pretreatment	NA	Multimedia
M	Effluent/Receiving Waters	NE	Laboratory	NE	Storm Water	NE	Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Receiving Waters: Bayou Manchac  
Region 8421 Basin: 040201

The inspection was complaint # T96326 related.

- The treatment system treats water from a car wash.
- The facility has a permit to discharge commingled treated vehicle wash and sanitary wastewater totaling less than 25,000 gallons per day.
- A DMR review revealed that the last DMR turned into our files was in 2001.
- The discharge water is a green color. There was no smell, no oily sheen and no solids present.
- Housekeeping at the facility appeared to be satisfactory at the time of the inspection.

Name(s) and Signature(s) of Inspector(s) Robert Gillett <i>Robert Gillett</i>	Agency/Office/Telephone/Fax LDEQ Office of Compliance / Surveillance (225) 219-3026	Date 05-21-2007
Signature of Reviewer <i>Bob Crain</i>	Agency/Office/Phone and Fax Numbers LDEQ Office of Compliance / Surveillance (225) 219-3619	Date <i>June 6, 2007</i>

### LPDES COMPLIANCE INSPECTION REPORT – LIST OF ATTACHMENTS

Facility Name: Benny's Car Wash LLC Permit #: LAG750350

Date of Inspection: 05-17-2007 AI #: 87126

The following attachments are included with this report:

- A) LPDES Compliance Inspection Report-Further Explanations
- B) DMR Calculation Check Sheet
- C) Flow Calculation Sheet
- D) Field Interview Form
- E) Photographs
- F) Written Request to Permittee for Additional Information
- G) Additional Information Supplied by Permittee
- H) Laboratory Data Sheet(s)
- I) Sampling Inspection Field Data Sheet(s)
- J) Chain of Custody/Sample Record
- K) Other: Incident Report, Tempo Report

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
FIELD INTERVIEW FORM

AGENCY INTEREST#: 87126 INSPECTION DATE: 5/17/07 TIME OF ARRIVAL: 1445  
ALTERNATE ID#: LA 6750350 DEPARTURE DATE: 5/17/07 TIME OF DEPARTURE: 1530  
(ID Type/Number)  
FACILITY NAME: Benny's Car Wash PH #: \_\_\_\_\_  
LOCATION: 5235 Essen Lane, Baton Rouge  
RECEIVING STREAM (BASIN/SUBSEGMENT): 04/02/01 PARISH NAME: East Baton Rouge (17)  
MAILING ADDRESS: 5235  
FACILITY REPRESENTATIVE: Paul Bourgeois (Street/P.O. Box) (City) (State) (ZIP)  
FACILITY REPRESENTATIVE PHONE NUMBER: \_\_\_\_\_ TITLE: Staff Eng.  
NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above): \_\_\_\_\_

INSPECTION TYPE: CEI PROGRAM INVOLVED: AIR WASTE WATER OTHER \_\_\_\_\_

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)  
The inspection was complaint # T96326 related. Car wash system is a loop system that is controlled by computers. Computer went down causing four times more water to be used in operations. Dye in operation causes a green color to water discharge. As soon as computer is back on line, discharge will return to normal.

AREAS OF CONCERN:

REGULATION	EXPLANATION	CORRECTED?
_____	_____	<del>YES</del> NO
_____	_____	YES NO
_____	_____	_____

PHOTOS TAKEN:  YES  NO SAMPLES TAKEN:  YES  NO (Attach Chain-of-custody)

RECEIVED BY: SIGNATURE: Paul Bourgeois

PRINT NAME: Paul Bourgeois  
(NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)

INSPECTOR(S): Robert Hillert CROSS REFERENCE: \_\_\_\_\_

ATTACHMENTS: \_\_\_\_\_

REVIEWER: Bob Crain

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

Site Benny's Car Wash LLC  
AI # 87126; LAG750350

Location: 5235 Essen Lane

City: Baton Rouge

Parish: East Baton Rouge

Photographer

Robert Gillett



Photo #: 1 of 5 Date: 05-17-2007

Time: 1338

Description:

LAG750350

AOCs - Y

Receiving Waters: Bayou Manchac

Region 8421 Basin: 040201

The inspection was complaint # T96326 related.

1. The treatment system treats water from a car wash.
2. The facility has a permit to discharge commingled treated vehicle wash and sanitary wastewater totaling less than 25,000 gallons per day.
3. A DMR review revealed that the last DMR turned into our files was in 2001.
4. The discharge water is a green color. There was no smell, no oily sheen and no solids present.
5. Housekeeping at the facility appeared to be satisfactory at the time of the inspection.



Photo #: 2 of 5 Date: 05-17-2007

Time: 1338

Description:

LAG750350

AOCs - Y

Receiving Waters: Bayou Manchac

Region 8421 Basin: 040201

The inspection was complaint # T96326 related.

1. The treatment system treats water from a car wash.
2. The facility has a permit to discharge commingled treated vehicle wash and sanitary wastewater totaling less than 25,000 gallons per day.
3. A DMR review revealed that the last DMR turned into our files was in 2001.
4. The discharge water is a green color. There was no smell, no oily sheen and no solids present.
5. Housekeeping at the facility appeared to be satisfactory at the time of the inspection.

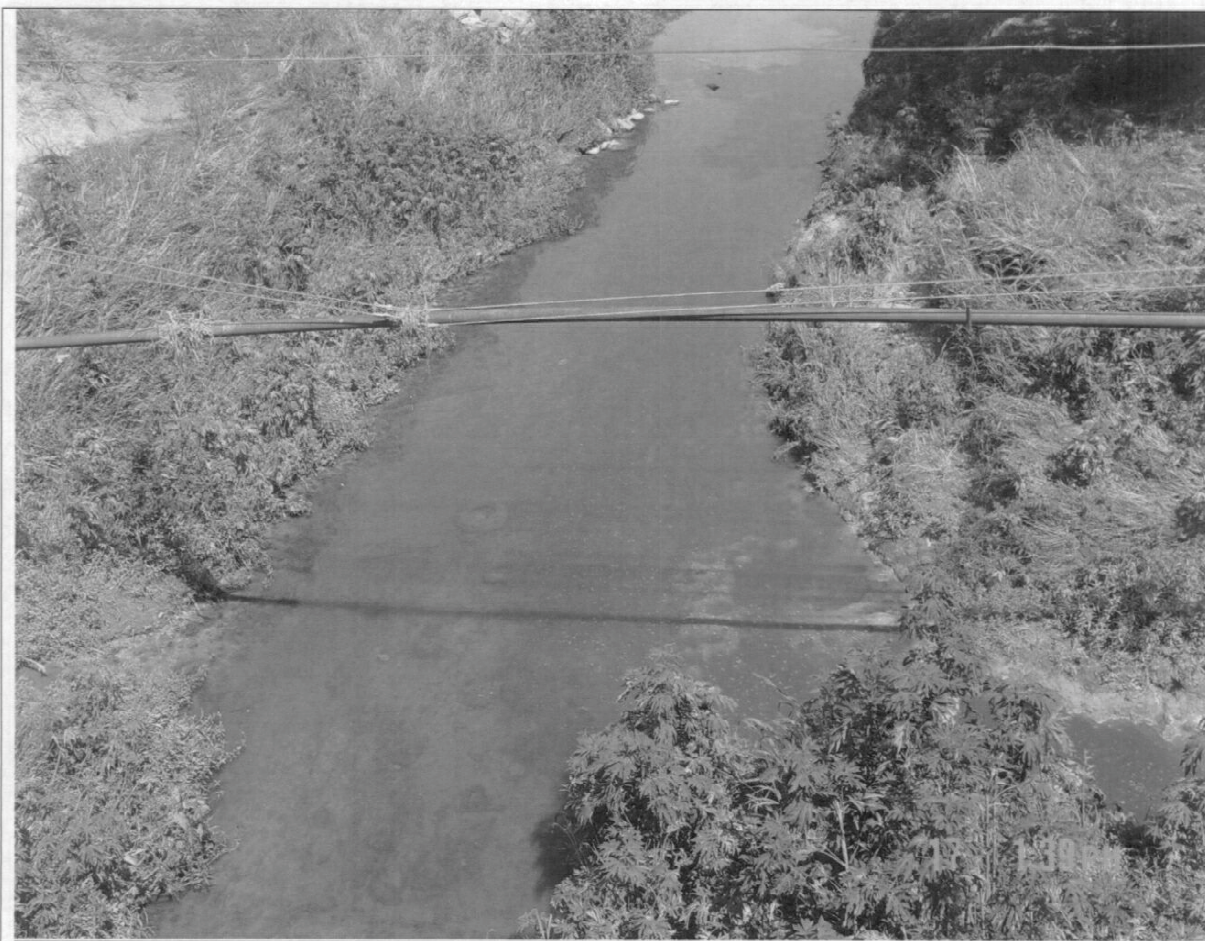


Photo #: 3 of 5 Date: 05-17-2007

Time: 1339

Description:

LAG750350

AOCs - Y

Receiving Waters: Bayou Manchac

Region 8421 Basin: 040201

The inspection was complaint # T96326 related.

1. The treatment system treats water from a car wash.
2. The facility has a permit to discharge commingled treated vehicle wash and sanitary wastewater totaling less than 25,000 gallons per day.
3. A DMR review revealed that the last DMR turned into our files was in 2001.
4. The discharge water is a green color. There was no smell, no oily sheen and no solids present.
5. Housekeeping at the facility appeared to be satisfactory at the time of the inspection.



Photo #: 4 of 5 Date: 05-17-2007

Time: 1339

Description:

LAG750350

AOCs - Y

Receiving Waters: Bayou Manchac

Region 8421 Basin: 040201

The inspection was complaint # T96326 related.

1. The treatment system treats water from a car wash.
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5. Housekeeping at the facility appeared to be satisfactory at the time of the inspection.

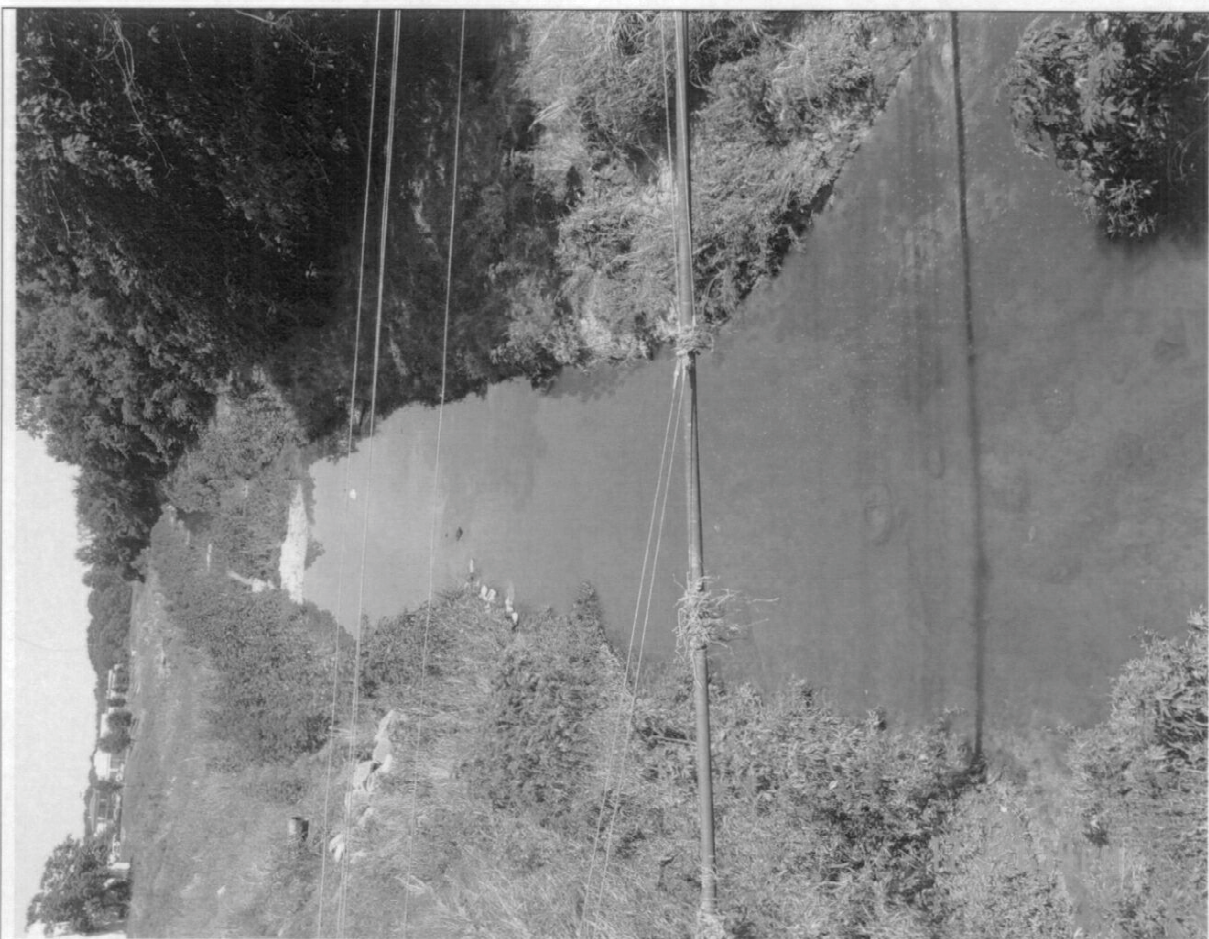


Photo #: 5 of 5 Date: 05-17-2007

Time: 1339

Description:

LAG750350

AOCs - Y

Receiving Waters: Bayou Manchac

Region 8421 Basin: 040201

The inspection was complaint # T96326 related.

1. The treatment system treats water from a car wash.
2. The facility has a permit to discharge commingled treated vehicle wash and sanitary wastewater totaling less than 25,000 gallons per day.
3. A DMR review revealed that the last DMR turned into our files was in 2001.
4. The discharge water is a green color. There was no smell, no oily sheen and no solids present.
5. Housekeeping at the facility appeared to be satisfactory at the time of the inspection.



INCIDENT REPORT FORM

Hot 6.

Received by: Carla Dispatch # 207-1949 Incident # T 97087V

Date Reported: 6/14/07 Time Reported: 9:50

Spill Incident/Release  Citizen Complaint  Emergency?  Yes  No Drill?  Yes  No

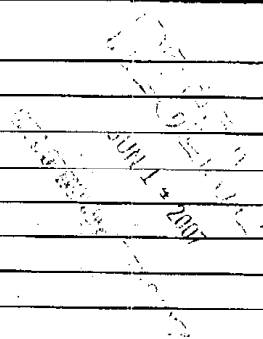
**CALLER INFORMATION:** Citizen  Industry  Anonymous Complaint   
 Other (i.e. Coast Guard): \_\_\_\_\_  
 Name/Company: \_\_\_\_\_ Title: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Is caller requesting a follow-up call? Yes  No  Date of Caller Contact: \_\_\_\_\_  
 Telephone No. \_\_\_\_\_ Parish (of occurrence): EBR

**SITE INFORMATION:**  
 Company Name/ Agency Interest # \_\_\_\_\_  
 Alleged Violator: Benny's Car Wash Other: \_\_\_\_\_  
 Location Address: Essen Lane, BR  
 Site is Active or Inactive: \_\_\_\_\_  
 Date of discharge if different from date report: \_\_\_\_\_ Time discharge noticed: Began \_\_\_\_\_ Ended \_\_\_\_\_  
 Media Affected: Air  Land  Surface Water  Ground Water  Other \_\_\_\_\_  
 If water affected, name of nearest water body (Basin/Subsegment): Ward's Creek to Manchac to Maurepas to Lake Pontchartrain  
 If air affected, note wind direction and weather conditions (if provided): \_\_\_\_\_

**DESCRIPTION OF RELEASE/SPILL/COMPLAINT:**  
 Product/material release and quantity (reported): \_\_\_\_\_  
 Product/material released and quantity (actual): \_\_\_\_\_  
 Description of release/complaint: A degreaser & possibly a tire cleaner (bright green in color) being put in drain & emptying into water bodies.  
 How was spill contained? Offsite Impact? \_\_\_\_\_  
 How was spilled cleaned/remediated? \_\_\_\_\_

**DIRECTIONS FOR REACHING THE SITE:**  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Investigator's Comments:**  
 \_\_\_\_\_  
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 \_\_\_\_\_



Region Assigned: CRO/Crain Summary Report: Yes  No   
 Investigator Assigned: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Investigator's Signature: \_\_\_\_\_ Reviewer's Initials & Date: \_\_\_\_\_  
 Date Closed: \_\_\_\_\_ Closed by: Site Visit  Telephone  Other: \_\_\_\_\_  
 Referred to: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

**INCIDENT REPORT**  
Incident ID: 97087

Incident Description

**Incident Type:** Complaint, Miscellaneous  
**Incident Date:** JUN-14-07 09:50  
**Parish:** East Baton Rouge  
**Municipality:** Baton Rouge  
**Location:** Benny's Car WashEssen LaneBaton Rouge  
**Lat/Lon:**  
**Basin/Segment:** 40201  
**Substance(s):**  
**Media Impacted:** Water  
**Incident Desc:** c07-1949A degreaser & possibly a tire cleaner (bright green in color) being put in drain and emptying into water...jd

Incident Status

**Lead Investigator:** Robert Gillett *Robert Gillett*  
**Incident Region:** Capital  
**Incident Status:** Referred to Enforcement  
**Followup Status:** Referred to Enforcement  
**As Of:** JUN-21-2007 08:57

Incident Reporter

**Received By:** Judy Desselle  
**Received Date:** JUN-14-2007 09:50  
**Dispatch #:** c07-1949  
**Reported By:** Anonymous  
**Phone:**  
**Reporter Title:**  
**Organization:**  
**Address:**  
  
**Municipality:**  
**State:**  
**Zip Code:**  
**Comments:**

06/21/2007

## LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Page 2 of 2

## INCIDENT REPORT

Incident ID: 97087

**Incident Source****Source Name:** Benney's Car Wash LLC - B Quick of Baton Rouge LLC III**Address:** 5235 Essen Ln**Municipality:** Baton Rouge**State:** LA**Phone:** 2257693571**Parish:** East Baton Rouge**AI #:** 87126**Related Permits:**

LAG750350

AOCs - Y

Receiving Waters: Wards Creek to Bayou Manchac

**Comments:** Region 8421 Basin: 040201

The inspection was complaint # T97087 related.

1. The treatment system treats water from a car wash.
2. The facility has a permit to discharge commingled treated vehicle wash and sanitary wastewater totaling less than 25,000 gallons per day.
3. A DMR review revealed that the last DMR turned into our files was in 2001.
4. The discharge water is a green color. There was no smell, no oily sheen and no solids present.
5. Housekeeping at the facility appeared to be satisfactory at the time of the inspection.

TPOR0022



**BOBBY JINDAL**  
GOVERNOR

**PEGGY M. HATCH**  
SECRETARY

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**OFFICE OF ENVIRONMENTAL COMPLIANCE**

*EDMS*  
*Cory*  
*Down*

October 18, 2012

**CERTIFIED MAIL (7004 2510 0005 5767 7459)**  
**RETURN RECEIPT REQUESTED**

**BENNY'S CARWASH, L.L.C.**  
c/o Lloyd B. Alford  
Registered Agent  
9611 B Airline Highway  
Baton Rouge, LA 70815

**RE: CONSOLIDATED COMPLIANCE ORDER**  
**& NOTICE OF POTENTIAL PENALTY**  
**ENFORCEMENT TRACKING NO. WE-CN-12-00525**  
**AGENCY INTEREST NOS. 87126 & 151794**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **BENNY'S CARWASH, L.L.C. (RESPONDENT)** for the violations described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violations cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Cory Lormand at (225) 219-3135.

Sincerely,

Celena J. Cage  
Administrator  
Enforcement Division

CJC/ccl  
Alt ID Nos. LAG750350 & LAG750612  
Attachment

e-copy: DHH/Office of Public Health

c: Justin Alford, Benny's Carwash, LLC

**STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE**

**IN THE MATTER OF**

**BENNY'S CARWASH, L.L.C.  
EAST BATON ROUGE PARISH  
ALT ID NOS. LAG750350 & LAG750612**

**PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT,  
La. R.S. 30:2001, ET SEQ.**

\*  
\*  
\* **ENFORCEMENT TRACKING NO.**  
\*  
\* **WE-CN-12-00525**  
\*  
\* **AGENCY INTEREST NOS.**  
\*  
\* **87126 & 151794**  
\*

**CONSOLIDATED  
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **BENNY'S CARWASH, L.L.C. (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

**FINDINGS OF FACT**

**I.**

The Respondent owns and/or operates Benny's Car Wash - Essen Lane (AI 151794) located at 5235 Essen Lane in Baton Rouge, East Baton Rouge Parish, Louisiana. The Respondent was granted coverage under the Louisiana Water Discharge Permit System (LWDPS) General Permit Number WG080000 on or about September 13, 1994, and was specifically assigned permit number WG-080041. The permit expired on July 19, 1995, and was not administratively extended. On or about July 18, 2007, the Department received a Notice of Intent (NOI) from the Respondent to discharge exterior vehicle and equipment wash wastewater. The Respondent was granted coverage under the Louisiana Pollutant Discharge Elimination System (LPDES) General Permit LAG750000 on or about July 24, 2007, and was specifically assigned permit number LAG750612. The permit expired on March 14, 2009, and was administratively extended until the general permit was reissued. LPDES General Permit LAG750612

was reissued to the Respondent on or about June 12, 2009, and will expire on March 14, 2014. Under the terms and conditions of LPDES General Permit LAG750612, the Respondent is authorized to discharge treated exterior vehicle wash wastewater to Ward's Creek, waters of the state.

**II.**

Inspections conducted by the Department on or about May 17, 2007, and June 20, 2007, at Benny's Car Wash - Essen Lane (AI 151794) in response to citizen's complaints, and a subsequent file review conducted by the Department on July 23, 2012, revealed that the Respondent failed to submit a Notice of Intent (NOI) or application for discharges from the facility and caused and/or allowed the following unauthorized discharges to waters of the state:

- A. The file review revealed that the Department submitted a letter to the Respondent dated March 5, 1999, that indicated the LWDPDS general permit issued to the facility expired on July 19, 1995, and that authorization under an LPDES permit was required for any continuing discharges at the facility. However, the Respondent continued to submit quarterly DMRs after the LWDPDS general permit expired, which indicated discharges had occurred from October 2006 through December 2006 and January 2007 through March 2007. At the time of the inspections, the Respondent caused and/or allowed the discharge of treated wastewater to Ward's Creek that was bright green in color, containing no smell, oily sheen, or solids. Correspondence from the Respondent dated July 18, 2007, indicated that upon notification of the complaint, the Respondent immediately discontinued use of the product containing the green dye and returned to a previously used product. The Respondent was not authorized to discharge from the facility until LPDES General Permit LAG750612 was issued to the Respondent on July 24, 2007. Each unauthorized discharge to waters of the state is a violation of La. R.S. 30:2075. The inspections further revealed that the discharge of green colored wastewater resulted in an objectionable color to Wards Creek, waters of the state. Each discharge that results in an objectionable color to waters of the state is a violation of La. R.S. 30:2076(A)(3), LAC 33:IX.1113.B.1.c, and LAC 33:IX.1113.B.2.a
- B. The file review also revealed that the Respondent failed to submit a Notice of Intent (NOI) or application for obtaining a LPDES permit for the discharges from the facility to waters of the state cited in Paragraph II.A, which is a violation of La. R.S. 30:2076(A)(3) and LAC 33:IX.2501.

**III.**

An inspection conducted by the Department on or about January 30, 2012, at Benny's Car Wash - Essen Lane (AI 151794) in response to a citizen's complaint, revealed the following:

- A. The Respondent caused and/or allowed the discharge of a pollutant not authorized by LPDES General Permit LAG750612. Specifically, the Respondent used a red dye in the carwash, which remained visible in the wastewater discharged through Outfall 001. LPDES General Permit LAG750612 does not authorize the discharge of the red dye in

the wastewater from the facility. Each discharge of a pollutant not authorized by LPDES General Permit LAG750612 is a violation of La. R.S. 30:2076(A)(3) and LAC 33:IX.501.C. The discharge of the red wastewater resulted in an objectionable color to Wards Creek, waters of the state. Each discharge that results in an objectionable color to waters of the state is a violation of La. R.S. 30:2076(A)(3), LAC 33:IX.1113.B.1.c, and LAC 33:IX.1113.B.2.a.

- B. The inspection also revealed that visible foam in greater than trace amounts was discharged from the carwash via Outfall 001 into Wards Creek, waters of the state. Each discharge of visible foam in greater than trace amounts is a violation of LPDES General Permit LAG750612 (Page 9 of 16 and Part III, Section A.2), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A.

#### IV.

An inspection conducted by the Department on or about January 30, 2012, at Benny's Car Wash – Essen Lane (AI 151794), and a subsequent file review conducted by the Department on or about July 23, 2012, revealed the following exceedances of permitted discharge limitations as reported by the Respondent on Discharge Monitoring Reports (DMRs):

Monitoring Period	Outfall	Parameter	Permit Limit	Reported Value
04/2007-06/2007	001	CBOD <sup>1</sup> (Daily Maximum)	300 mg/L	665 mg/L
		Oil & Grease	15 mg/L	50.4 mg/L
01/2007-03/2007	001	CBOD (Daily Maximum)	300 mg/L	776 mg/L
		TSS <sup>2</sup> (Daily Maximum)	45 mg/L	490 mg/L
		Oil & Grease	15 mg/L	41 mg/L
10/2007-12/2007	001	CBOD (Daily Maximum)	300 mg/L	479 mg/L
		TSS (Daily Maximum)	45 mg/L	6,443 mg/L
		Oil & Grease	15 mg/L	39.4 mg/L
		TSS (Daily Maximum)	45 mg/L	3,097 mg/L*
04/2008-06/2008	001	CBOD (Daily Maximum)	300 mg/L	614 mg/L
		TSS (Daily Maximum)	45 mg/L	101 mg/L
		Oil & Grease	15 mg/L	19.7 mg/L
07/2008-09/2008	001	CBOD <sup>1</sup> (Daily Maximum)	300 mg/L	1,796 mg/L
		Oil & Grease	15 mg/L	38.3 mg/L
10/2008-12/2008	001	CBOD (Daily Maximum)	300 mg/L	402 mg/L
		TSS (Daily Maximum)	45 mg/L	94.4 mg/L
		Oil & Grease	15 mg/L	61.1 mg/L
01/2009-03/2009	001	CBOD (Daily Maximum)	300 mg/L	519 mg/L
		TSS (Daily Maximum)	45 mg/L	77.6 mg/L
		Oil & Grease	15 mg/L	54.4 mg/L

Monitoring Period	Outfall	Parameter	Permit Limit	Reported Value
04/2009-06/2009	001	CBOD (Daily Maximum)	300 mg/L	527 mg/L
		TSS (Daily Maximum)	45 mg/L	57.5 mg/L
		Oil & Grease	15 mg/L	24.5 mg/L
		CBOD (Daily Maximum)	300 mg/L	519 mg/L*
		TSS (Daily Maximum)	45 mg/L	49 mg/L*
		Oil & Grease	15 mg/L	24.3 mg/L*
07/2009-09/2009	001	CBOD (Daily Maximum)	300 mg/L	430mg/L
		CBOD (Daily Maximum)	300 mg/L	406 mg/L*
10/2009-12/2009	001	CBOD (Daily Maximum)	300 mg/L	309 mg/L
		Oil & Grease	15 mg/L	44.2 mg/L
		CBOD (Daily Maximum)	300 mg/L	307 mg/L*
		Oil & Grease	15 mg/L	17.3 mg/L*
01/2010-03/2010	001	CBOD (Daily Maximum)	300 mg/L	358 mg/L
		TSS (Daily Maximum)	45 mg/L	176 mg/L
		Oil & Grease	15 mg/L	15.5 mg/L
		CBOD (Daily Maximum)	300 mg/L	322 mg/L*
		TSS (Daily Maximum)	45 mg/L	82.7 mg/L*
04/2010-06/2010	001	CBOD (Daily Maximum)	300 mg/L	575 mg/L
		TSS (Daily Maximum)	45 mg/L	4,736 mg/L
		CBOD (Daily Maximum)	300 mg/L	456 mg/L*
		TSS (Daily Maximum)	45 mg/L	123 mg/L*
07/2010-09/2010	001	pH (maximum)	9.0 Standard Units	9.1 Standard Units
10/2010-12/2010	001	TSS (Daily Maximum)	45 mg/L	178 mg/L
		TSS (Daily Maximum)	45 mg/L	60.3 mg/L*
01/2011-03/2011	001	TSS (Daily Maximum)	45 mg/L	77.7 mg/L
		TSS (Daily Maximum)	45 mg/L	52.7 mg/L*
04/2011-06/2011	001	CBOD (Daily Maximum)	300 mg/L	450 mg/L
		TSS (Daily Maximum)	45 mg/L	62 mg/L
		Oil & Grease	15 mg/L	20 mg/L
		CBOD (Daily Maximum)	300 mg/L	390 mg/L*
		Oil & Grease	15 mg/L	16 mg/L*
10/2011-12/2011	001	CBOD (Daily Maximum)	300 mg/L	46 mg/L
		TSS (Daily Maximum)	45 mg/L	410 mg/L
		Oil & Grease	15 mg/L	18 mg/L
		CBOD (Daily Maximum)	300 mg/L	320 mg/L*
		TSS (Daily Maximum)	45 mg/L	130 mg/L*
		Oil & Grease	15 mg/L	20 mg/L*



Monitoring Period	Outfall	Parameter	Permit Limit	Reported Value
01/2012-03/2012	001	CBOD (Daily Maximum)	300 mg/L	350 mg/L
		TSS (Daily Maximum)	45 mg/L	130 mg/L
		Oil & Grease	15 mg/L	19 mg/L
		CBOD (Daily Maximum)	300 mg/L	340 mg/L*
		TSS (Daily Maximum)	45 mg/L	70 mg/L*

<sup>1</sup> Chemical Oxygen Demand (COD)    <sup>2</sup> Total Suspended Solids (TSS)

\* Reported on Noncompliance Reports.

Each exceedance of a permitted discharge limitation prior to June 12, 2009, is a violation of LPDES General Permit LAG750612 (Part I, Section B, Page 6 of 16 and Part III, Section A.2), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A. Each exceedance of a permitted discharge limitation after June 12, 2009, is a violation of LPDES General Permit LAG750612 (Section B, Page 8 of 16 and Part III, Section A.2), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A.

#### V.

A file review conducted by the Department on or about July 23, 2012, of Benny's Car Wash – Essen Lane (AI 151794) revealed that the Respondent failed to submit DMRs in a timely manner. Specifically, the Respondent submitted DMRs for the April 2007 – June 2007 through January 2012 – March 2012 quarterly monitoring periods with a signature date of May 31, 2012. The Respondent is required to submit DMRs on a quarterly basis no later than the 28<sup>th</sup> day of the month following each quarterly monitoring period. The most recent of these DMRs was due by April 28, 2012. In addition, a consulting firm for the Respondent submitted a letter dated May 31, 2012, indicating that these and other DMRs were being submitted with the letter. Therefore, the DMRs were received after the due dates. Each failure to submit DMRs in a timely manner is a violation of LPDES General Permit LAG750612 (Page 16 of 16 and Part III, Sections A.2 and D.4), La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.L.4.

#### VI.

The Respondent owns and/or operates a carwash, B-Quik of Baton Rouge Number Three (AI 87126), located at 4105 Perkins Road in Baton Rouge, East Baton Rouge Parish, Louisiana. The Respondent was granted coverage under the Louisiana Pollutant Discharge Elimination System (LPDES) General Permit LAG750000 on or about February 2, 2001, and was specifically assigned permit number LAG750350. The permit expired on June 30, 2003, but was administratively extended until the general permit was reissued. LPDES General Permit LAG750350 was reissued to the Respondent on or about May 7, 2004, and expired on March 14, 2009, but was administratively

extended until the general permit was reissued. LPDES General Permit LAG750350 was reissued to the Respondent on or about June 12, 2009, and will expire on March 14, 2014. Under the terms and conditions of LPDES General Permit LAG750350, the Respondent is authorized to discharge treated exterior vehicle wash wastewater from the facility through local drainage, thence to Dawson Creek, all waters of the state.

#### VII.

A file review conducted by the Department on or about July 23, 2012, of B-Quik of Baton Rouge Number Three (AI 87126) revealed the following exceedances of permitted discharge limitations as reported by the Respondent on Discharge Monitoring Reports (DMRs):

Monitoring Period	Outfall	Parameter	Permit Limit	Reported Value
01/2006 – 03/2006	001	COD (Daily Maximum)	300 mg/L	307.64 mg/L
		TSS (Daily Maximum)	45 mg/L	96 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	20 mg/L
10/2006-12/2006	001	TSS (Daily Maximum)	45 mg/L	262 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	82 mg/L
01/2007 – 03/2007	001	COD (Daily Maximum)	300 mg/L	476 mg/L
		TSS (Daily Maximum)	45 mg/L	57 mg/L
04/2007-06/2007	001	TSS (Daily Maximum)	45 mg/L	96.3 mg/L
		COD (Daily Maximum)	300 mg/L	405 mg/L
07/2007-09/2007	001	TSS (Daily Maximum)	45 mg/L	103 mg/L
		COD (Daily Maximum)	300 mg/L	368 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	52.8 mg/L
10/2007-12/2007	001	TSS (Daily Maximum)	45 mg/L	242 mg/L
		COD (Daily Maximum)	300 mg/L	418 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	21.6 mg/L
04/2008-06/2008	001	TSS (Daily Maximum)	45 mg/L	67.6 mg/L
		COD (Daily Maximum)	300 mg/L	662 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	44.9 mg/L
10/2008-12/2008	001	TSS (Daily Maximum)	45 mg/L	62.5 mg/L
		COD (Daily Maximum)	300 mg/L	474 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	37.2 mg/L
		TSS (Daily Maximum)	45 mg/L	50 mg/L*
		COD (Daily Maximum)	300 mg/L	367 mg/L*
01/2009-03/2009	001	Oil & Grease (Daily Maximum)	15 mg/L	18.2 mg/L*
		TSS (Daily Maximum)	45 mg/L	73.3 mg/L
		COD (Daily Maximum)	300 mg/L	426 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	45.6 mg/L

Monitoring Period	Outfall	Parameter	Permit Limit	Reported Value
07/2009-09/2009	001	TSS (Daily Maximum)	45 mg/L	50 mg/L
01/2010-03/2010	001	TSS (Daily Maximum)	45 mg/L	160 mg/L
		COD (Daily Maximum)	300 mg/L	529 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	25.9 mg/L
		TSS (Daily Maximum)	45 mg/L	55.4 mg/L*
		COD (Daily Maximum)	300 mg/L	454 mg/L*
		Oil & Grease (Daily Maximum)	15 mg/L	18.6 mg/L*
04/2010-06/2010	001	TSS (Daily Maximum)	45 mg/L	148 mg/L
		COD (Daily Maximum)	300 mg/L	469 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	20.6 mg/L
		TSS (Daily Maximum)	45 mg/L	79.3 mg/L*
		COD (Daily Maximum)	300 mg/L	444 mg/L*
10/2010-12/2010	001	COD (Daily Maximum)	300 mg/L	448 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	17.5 mg/L
01/2011-03/2011	001	TSS (Daily Maximum)	45 mg/L	213 mg/L
		COD (Daily Maximum)	300 mg/L	922 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	137 mg/L
		pH (maximum)	9.0 Standard Units	9.23 Standard Units
		TSS (Daily Maximum)	45 mg/L	149 mg/L*
		COD (Daily Maximum)	300 mg/L	373 mg/L*
		Oil & Grease (Daily Maximum)	15 mg/L	19.3 mg/L*
04/2011-06/2011	001	COD (Daily Maximum)	300 mg/L	620 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	29 mg/L
		COD (Daily Maximum)	300 mg/L	310 mg/L*
		Oil & Grease (Daily Maximum)	15 mg/L	22 mg/L*
07/2011-09/2011	001	COD (Daily Maximum)	300 mg/L	490 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	22 mg/L
		COD (Daily Maximum)	300 mg/L	340 mg/L*
		Oil & Grease (Daily Maximum)	15 mg/L	20 mg/L*
10/2011-12/2011	001	Oil & Grease (Daily Maximum)	15 mg/L	24 mg/L
		Oil & Grease (Daily Maximum)	15 mg/L	22 mg/L*
01/2012-03/2012	001	TSS (Daily Maximum)	45 mg/L	89 mg/L
		COD (Daily Maximum)	300 mg/L	370 mg/L
		TSS (Daily Maximum)	45 mg/L	79 mg/L*
		COD (Daily Maximum)	300 mg/L	340 mg/L*

\* Reported on Noncompliance Reports

Each exceedance of a permitted discharge limitation prior to June 12, 2009, is a violation of LPDES General Permit LAG750350 (Part I, Section B, Page 6 of 16; Part II, Section E; and Part III, Section

A.2), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A. Each exceedance of a permitted discharge limitation after June 12, 2009, is a violation of LPDES General Permit LAG750350 (Section B, Page 8 of 16 and Part III, Section A.2), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A.

### VIII

A file review conducted by the Department on or about July 23, 2012, of B-Quik of Baton Rouge Number Three (AI 87126) revealed that the Respondent failed to submit DMRs in a timely manner. Specifically, the Respondent submitted DMRs for the April 2007 – June 2007 through January 2012 – March 2012 quarterly monitoring periods with a signature date of May 31, 2012. The Respondent is required to submit DMRs on a quarterly basis no later than the 28<sup>th</sup> day of the month following each quarterly monitoring period. The most recent of these DMRs was due by April 28, 2012. In addition, a consultant firm for the Respondent submitted a letter dated May 31, 2012, indicating that these and other DMRs were being submitted with the letter. Therefore, the DMRs were received after the due dates. Each failure to submit DMRs in a timely manner is a violation of LPDES General Permit LAG750350 (Page 16 of 16 and Part III, Sections A.2 and D.4), La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.L.4.

### COMPLIANCE ORDER

Based on the foregoing, the Respondent is hereby ordered:

#### I.

To cease, immediately upon receipt of this **COMPLIANCE ORDER**, any unauthorized discharges from the facility to waters of the state.

#### II.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Water Quality Regulations and the permit limitations and conditions contained in LPDES General Permits LAG750350 and LAG750612, including, but not limited to, allowing a discharge that affects the natural aesthetics of waters of the state and submitting DMRs in a timely manner.

#### III.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order

Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance  
Post Office Box 4312  
Baton Rouge, Louisiana 70821-4312  
Attn: Cory Lormand  
Re: Enforcement Tracking No. WE-CN-12-00525  
Agency Interest Nos. 87126 & 151794

**THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:**

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality  
Office of the Secretary  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302  
Attn: Hearings Clerk, Legal Division  
Re: Enforcement Tracking No. WE-CN-12-00525  
Agency Interest Nos. 87126 & 151794

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

#### IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

#### V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

#### VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

#### VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

### **NOTICE OF POTENTIAL PENALTY**

#### I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Cory Lormand at (225) 219-3135 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.


III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement.

IV.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 18 day of October, 2012.

  
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Cheryl Sonnier Nolan  
Assistant Secretary  
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

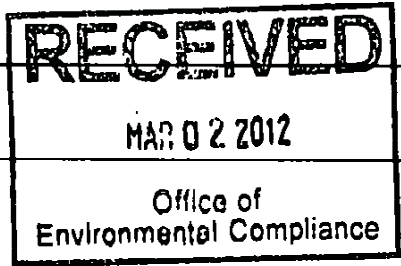
Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Enforcement Division  
P.O. Box 4312  
Baton Rouge, LA 70821-4312  
Attention: Cory Lormand

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
INTRA-AGENCY ROUTING FORM**

**TO:** Enforcement Division

**FROM:** Surveillance Division

**Routing Date:** 03-02-2012



**Facility Information**

<b>Company Name:</b> (Benny's Car Wash)	
<b>Facility Site Name:</b> (Benny's Car Wash)	
<b>Agency Interest No:</b> (151794)	<b>Alt. AI No:</b> (LAG750612)
<b>Mailing Address:</b>	<b>Physical Address:</b>
<b>Street:</b> 9611B Airline Highway	<b>Street:</b> 5235 Essen Lane
<b>City, State, Zip:</b> Baton Rouge, LA 70816	<b>City, Parish:</b> Baton Rouge, (EBR Parish)
<b>Responsible Party/Contact Person:</b> (Paul Bourgeois)	
<b>Responsible Party/Contact Person Telephone No:</b> (225) 262-9198	

**Inspection/Referral Information**

<b>Inspection Date:</b> (1/30/2012)	<b>Hours Spent On Inspection/Report:</b> 16
<b>Media:</b> Check all that apply	
Air (inc. asbestos/lead): <input type="checkbox"/>	Water: <input checked="" type="checkbox"/>
Solid Waste (inc. tires): <input type="checkbox"/>	UST: <input type="checkbox"/>
Haz. Waste: <input type="checkbox"/>	Radiation: <input type="checkbox"/>
Risk MPs: <input type="checkbox"/>	Stage 1 & 2: <input type="checkbox"/>
Remediation: <input type="checkbox"/>	

<b>Complaint?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Follow up?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	<i>If yes</i>
		<i>Enforcement Action Number</i>
<b>Inspector/Team Leader Name:</b> (Mary David)		
<b>Inspector/Team Leader Contact No.:</b> (225) 219-3343		
<b>Approved By:</b>		<b>Date:</b>
<b>Circuit Rider Review:</b>		<b>Date:</b>



<b>Basis for Routing</b> (check all that apply)			
<b>Areas of Concern:</b> <input checked="" type="checkbox"/>	<b>Contamination Above RECAP:</b> <input type="checkbox"/>		
<input type="checkbox"/> <b>Conveyance Notice Only</b>	<b>TEMPO Task ID No:</b>	<b>INS20120001</b>	
<b>Other:</b> <input type="checkbox"/>	Please Explain:		
<p><b>Additional Information:</b> <i>This section should state the specific reason for the referral, actions that have been taken by the referring division and supporting documentation. This section should also provide sufficient discussion and/or documentation for the Division receiving the referral to take action including documentation of events leading to the referral and company contact information.</i></p>			
<p>LAC 33:IX.501.A -- Facility has not submitted DMRs for period of review beginning July 2007 to December 2011.</p>			
<p>LAC 33LIX.501.C -- Discharging red water and foam to Ward's Creek; frequent exceedences for COD, TSS, Oil and Grease, and 1 pH exceedence on DMRs; period of review: January 2010 through December 2011.</p>			

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
FIELD INTERVIEW FORM**

AGENCY INTEREST#: 151794 INSPECTION DATE: 1/30/12 TIME OF ARRIVAL: 9:15 AM  
 ALTERNATE ID#: LA9750612 DEPARTURE DATE: 1/30/12 TIME OF DEPARTURE: 11:58 AM  
 FACILITY NAME: Pennystar Wash-Essen PH#: 225 769-3511  
 LOCATION: 5235 Essen Lane, Baton Rouge 70809  
 RECEIVING STREAM (BASIN/SUBSEGMENT): Ward's Creek PARISH NAME: EBR  
 MAILING ADDRESS: 9611 B Ouline Hwy Baton Rouge LA 70815  
 FACILITY REPRESENTATIVE: Paul Bourgeois (City) LA (State) 70815 (ZIP)  
 FACILITY REPRESENTATIVE PHONE NUMBER: 262-9198 (cell) TITLE: Chemical Tech  
 NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above):  
same

INSPECTION TYPE: Complaint PROGRAM INVOLVED: AIR WASTE WATER OTHER \_\_\_\_\_  
 7136808

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)  
Inspected facility in response to Red Water discharge from storm drain @ Essen + Ward's Creek. Facility is currently not discharging. Outfall pipe (green) was inspected and had a reddish tint, low flow. Reclaim tank inspected also had reddish tint. Facility not sure what caused this incident. Operations have not changed. Suspect may be older dye they were using & may have been more concentrated @ bottom of diene. However,

**AREAS OF CONCERN:**

REGULATION	EXPLANATION	CORRECTED?
_____	_____	YES NO
_____	_____	YES NO
_____	_____	YES NO

PHOTOS TAKEN:  YES  NO SAMPLES TAKEN:  YES  NO (Attach Chain-of-custody)  
 RECEIVED BY: SIGNATURE: [Signature]  
 PRINT NAME: Paul Bourgeois  
 (NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)  
 INSPECTOR(S): Mary David CROSS REFERENCE: \_\_\_\_\_  
Sean Darenbourg ATTACHMENTS: \_\_\_\_\_  
 REVIEWER: \_\_\_\_\_

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
 FIELD INTERVIEW FORM OBSERVATIONS (cont'd)

FACILITY ID#: \_\_\_\_\_ INSPECTION DATE: 1/30/12

FACILITY NAME: Benny's Car Wash - Essen

INSPECTOR OBSERVATIONS CONT:

usual inspection by Mr. Bourgeois did not indicate any problems with the dip.

Record review to July 2007 from EDMS revealed no DMRS on file submitted to LDEQ. DMRS + Analytical Data are kept @ main office on Airline.

Received copies of DMRS from A&E Labs - DMRS reviewed for period January 2010 - December 2011. Facility samples quarterly + has been resampling when they are over permit limits. During period had 7 COD, 11 TSS, 5 Oil + Grease + 1 pH Exceedence.

Collected COD sample from outfall 001 & field parameters.

pH	7.41
Temp	20.11
LDO	3.83
LDO%	42%
conductivity	393.9

POB

INITIALS OF RECEIPT \_\_\_\_\_

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
INSPECTOR OBSERVATIONS (cont'd)**

AGENCY INTEREST#: 151794      ALTERNATE ID#: LAG750612      INSPECTION DATE: 1/30/12

FACILITY NAME: Benny's Car Wash

**INSPECTOR OBSERVATIONS CONT'D:**

After departing the car wash, inspectors went to the Essen Lane canal by Tire Kingdom, the site of the pinkish-colored water leaving the facility through the storm drain into the Ward's Creek Area. A COD sample was taken at 12:10pm and hydrolab readings were taken as well.

LDO% - 83.0

LDO - 8.08

ph - 7.49

Sal - 0.29

Sp Cond - 491.1

Temp - 17.07

Sample results from COD samples returned to DEQ. The following results were noted:

<sup>1)</sup> Sample from Benny's Car Wash: 160 mg/l

<sup>2)</sup> Sample from Ward's Creek on Essen Lane: 250 mg/l

INITIALS OF RECEIPT \_\_\_\_\_