



A R K A N S A S
Department of Environmental Quality

July 23, 2018

Philip Ofosu (6SFTS)
USEPA Region 6
1445 Ross Avenue
Suite 1200
Dallas, TX 75202-2733

Re: Lewis Lumber and Manufacturing Company
136 West Mill Street
Cove, Polk County, AR
AFIN: 57-00020

Dear Mr. Ofosu:

The Arkansas Department of Environmental Quality Office of Land Resources (ADEQ) has completed a Pre-Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Screening Assessment (PSA) for the Lewis Lumber and Manufacturing Company ("Lewis Lumber") site located at 136 West Mill Street, Cove, Polk County, Arkansas. Enclosed, please find a copy of the PSA.

Based on the results of the Site Inspection Prioritization (SIP) report prepared in 1994, a No Further Remedial Action Planned under Superfund decision was made for the Lewis Lumber site. The site remained active for over fifteen additional years after the report was written and had a history of hazardous waste generation and poor waste management practices. ADEQ is recommending further investigation be conducted to reevaluate the Lewis Lumber site under current conditions.

If you have any questions or require additional information, please contact me at 501-682-0872 or by email at krepusk@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink that reads "Katie Kreps".

Katie Kreps
Site Assessment and Brownfield Inspector
Office of Land Resources
Arkansas Department of Environmental Quality

Enclosure: PSA Report

**PRE-CERCLA SCREENING ASSESSMENT
FOR**

**Lewis Lumber and Manufacturing Company
136 West Mill Street
Cove, Polk County
Arkansas, 71937**

July 2018

**Prepared for:
United States Environmental Protection Agency
Region VI**

**Prepared by:
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118**

ATTACHMENTS:

- A. Pre-CERCLA Screening Checklist/Decision Form
- B. Site Location and County Map
- C. Site Map
- D. Photographic Log

ATTACHMENT A:

PRE-CERCLA SCREENING CHECKLIST/DECISION FORM

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

This form is used in conjunction with a site map and any additional information required by the EPA Region to document completion of a Pre-CERCLA Screening (PCS). The form includes a decision on whether a site should be added to the Superfund program's active site inventory for further investigation. Select from available dropdown values for fields marked with an asterisk *.

Region: 6 State/Territory: AR Tribe: _____ ARD006348353
Click here for the [EPA Tribe Entity Mapping spreadsheet.](#) EPA ID No. (If Available)

Site Name: Lewis Lumber and Manufacturing Company
 Other Site Name(s): Lewis Lumber Company, Hairrell Lumber

Site Location: 136 West Mill Street
(Street)
2 Cove Polk AR 71937 +
Congressional District (City) (County) (State / Terr) (Zip+4)

If no street address is available: _____
(Township-Range) (Section)

Checklist Preparer: Katie Kreps / Site Assessment and Brownfield Inspector 07/23/2018
(Name / Title) (Date)
Arkansas Department of Environmental Quality (501) 682-0872
(Organization) (Phone)
5301 Northshore Drive krepsk@adeq.state.ar.us
(Street) (Email)
North Little Rock Pulaski AR 72118 + 5317
(City) (County) (State / Terr) (Zip+4)

Site Contact Info/Mailing Address: Jerry Hairrell
HC 71 Box 164, Clayton, OK 74536

CERCLA 105d Petition for Preliminary Assessment? No If Yes, Petition Date (mm/dd/yyyy): _____
 RCRA Subtitle C Site Status: Is site in RCRAInfo? Yes If Yes, RCRAInfo Handler ID #: ARD006348353
 Ownership Type*: Private Additional RCRAInfo ID #(s): N/A
 Site Type*: Manufacturing/Processing/Maintenance State ID #(s): 57-00020
 Site Sub-Type*: Lumber & wood products/wood preserving/treatmen Other ID #(s): N/A
 Federal Facility? No Federal Facility Owner*: (Make selection)
 Formerly Used Defense Site (FUDS)? No Federal Facility Operator*: (Make selection)
 Federal Facility Docket? No If Yes, FF Docket Listing Date (mm/dd/yyyy): _____
 Federal Facility Docket Reporting Mechanism*: (Make selection)
 Native American Interest? No If Yes, list Tribe: _____
 Additional Tribe (s): _____

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

Complete this checklist to help determine if a site should be added to the Superfund Active site inventory. See Section 3.6 of the PCS guidance for additional information.	YES	NO	Unknown
1. An initial search for the site in EPA's Superfund active, archive and non-site inventories should be performed prior to starting a PCS. Is this a new site that does not already exist in these site inventories?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is there evidence of an actual release or a potential to release?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are there possible targets that could be impacted by a release of contamination at the site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is there documentation indicating that a target has been exposed to a hazardous substance released from the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Is the release of a naturally occurring substance in its unaltered form, or is it altered solely through naturally occurring processes or phenomena, from a location where it is naturally found?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is the release from products which are part of the structure of, and result in exposure within, residential buildings or business or community structures?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. If there has been a release into a public or private drinking water supply, is it due to deterioration of the system through ordinary use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Are the hazardous substances possibly released at the site, or is the release itself, excluded from being addressed under CERCLA?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Is the site being addressed under RCRA corrective action or by the Nuclear Regulatory Commission?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Is another federal, state, tribe or local government environmental cleanup program other than site assessment actively involved with the site (e.g., state voluntary cleanup program)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. Is there sufficient documentation or evidence that demonstrates there is no likelihood of a significant release that could cause adverse environmental or human health impacts?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12. Are there other site-specific situations or factors that warrant further CERCLA remedial/integrated assessment or response?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

Preparer's Recommendation: Add site to the Superfund active site inventory.

Do not add site to the Superfund active site inventory.

Please explain recommendation below:

PCS Summary and Decision Rationale
<p>Use this section to summarize PCS findings and support the decision to add or not add the site to the Superfund active site inventory for further investigation. Information does not need to be specific but, where known, can include key factors such as source and waste characteristics (e.g., drums, contaminated soil); evidence of release or potential release; threatened targets (e.g., drinking water wells); key sampling results (if available); CERCLA eligibility; involvement of other cleanup programs; and other supporting factors.</p> <hr/> <p><i>Insert text here (if text exceeds size of text box, view all text on page 6):</i></p> <p>Throughout its operational history, the Lewis Lumber and Manufacturing Company ("Lewis Lumber") site was used as a lumber mill and wood treating facility. Lewis Lumber began lumber mill operations on-site in 1958 and began wood treating in 1976. Lewis Lumber operated on-site until 2009, when the property was sold to Jerry Hairrell and Hairrell Lumber began operations. Hairrell Lumber closed and ceased operations on December 30, 2010 due to bankruptcy. Based on the results of the Site Inspection Prioritization (SIP) report prepared in 1994, a No Further Remedial Action Planned under Superfund decision was made for the Lewis Lumber site. The site remained active for over fifteen additional years after the report was written and had a history of hazardous waste generation and poor waste management practices. ADEQ is recommending further investigation be conducted to reevaluate the Lewis Lumber site under current conditions.</p>

Site Assessor: Katie Krepes, ADEQ / Kevin Kagan 07/23/2018
 Print Name/Signature Date

EPA Regional Review and Pre-CERCLA Screening Decision

Add site to the Superfund active site inventory for completion of a:

- Standard/full preliminary assessment (PA)
- Abbreviated preliminary assessment (APA)
- Combined preliminary assessment/site inspection (PA/SI)
- Integrated removal assessment and preliminary assessment
- Integrated removal assessment and combined PA/SI
- Other: _____

Do not add site to the Superfund active site inventory. Site is:

- Not a valid site or incident
- Being addressed by EPA's removal program
- Being addressed by a state cleanup program
- Being addressed by a tribal cleanup program
- Being addressed under the Resource Conservation and Recovery Act
- Being addressed by the Nuclear Regulatory Commission
- Other: _____

EPA Regional Reviewer: _____
 Print Name/Signature Date

Site Description

The following description of the Lewis Lumber and Manufacturing Company (“Lewis Lumber”) site was obtained from Polk County property records, Arkansas Department of Environmental Quality (ADEQ) records, Arkansas Department of Transportation (ARDOT) historical aerial photographs, and site reconnaissance conducted on May 30, 2018.

The Lewis Lumber site is located at 136 West Mill Street, Cove, Polk County, Arkansas. **Attachment B** provides the location of Polk County and the Lewis Lumber site. Throughout its operational history, the Lewis Lumber site was used as a lumber mill and wood treating facility. According to the Site Inspection Prioritization (SIP) report prepared by Roy F. Weston, Inc. in 1994, Lewis Lumber began lumber mill operations on-site in 1958 and began wood treating in 1976. Prior to 1976, the majority of operations occurred on the northern portion of the site. Lewis Lumber operated on-site until 2009, when the property was sold to Jerry Hairrell and Hairrell Lumber began operations. Hairrell Lumber closed and ceased operations on December 30, 2010 due to bankruptcy. The site has remained inactive since this time.

Attachment C provides an aerial view and depicts the boundaries of the Lewis Lumber site and significant site features. **Attachment D** provides a photographic log from the site reconnaissance. The Lewis Lumber site is approximately thirty-seven acres in size. The site is located in a rural residential and agricultural area with a wooded area to the north; residences and North Lewis Street to the east; a wooded area and residences to the south; and an open vegetated field to the west (Refer to Photographic Log, Photos 1–4). West Mill Street intersects the site from the east and separates the site into a northern and southern portion (Refer to Photographic Log, Photo 5).

The site is not fenced and is easily accessible to trespassers; however, a gate is located at the entrance to the site on West Mill Street. During reconnaissance, the gate was locked, making the site inaccessible by vehicle (Refer to Photographic Log, Photo 6).

Approximately twenty buildings were formerly located on the Lewis Lumber site. The majority of the buildings had been demolished prior to the May 30, 2018 site reconnaissance. Demolition debris is located throughout the site, primarily in the locations of former buildings (Refer to Photographic Log, Photos 7–22). Included within the demolition debris are empty 5-gallon hydraulic fluid buckets, small-quantity containers of various contents, broken universal waste bulbs, and various wiring and tubing (Refer to Photographic Log, Photos 23–26). The only buildings remaining on-site are portions of the Chromium Copper Arsenate (CCA) Treatment Building on the southern portion; a former residence on the west portion; and an office, break building, and wooden frame of a plywood storage building on the northern portion of the site (Refer to Photographic Log, Photos 27–31). All buildings remaining on-site are in poor

condition. In addition to concrete foundations of former buildings, the remaining land cover at the site consists mostly of gravel and vegetated areas.

There are multiple burn piles and numerous areas of staining on gravel, concrete foundations, and soil, accompanied by hydrocarbon odor, located throughout the Lewis Lumber site (Refer to Photographic Log, Photos 32–42). In addition, one concrete foundation on the northern portion of the site had staining in the shape of rings indicative of 55-gallon drums (Refer to Photographic Log, Photo 43). Areas of disturbed soil, presumably resulting from demolition activities, and a large sawdust pile are located on the north-central portion of the site (Refer to Photographic Log, Photo 44).

The CCA Treatment Building is a grouping of buildings on the southern portion of the site that were adjoined over time. Areas of staining accompanied by hydrocarbon and chemical odors were located in numerous areas in and around the CCA Treatment Building (Refer to Photographic Log, Photo 45). Three large aboveground storage tanks (ASTs) labeled “Wood Chemicals Group CCA-C (50%) Wood Preservative” (“CCA Tanks”) are located within a concrete containment area under a portion of the CCA Treatment Building (Refer to Photographic Log, Photo 46). During site reconnaissance, all three CCA Tanks were empty. Green staining was visible on the CCA Tanks and inside the concrete containment area. In addition, during site reconnaissance, the concrete containment area surrounding the CCA Tanks contained a liquid presumed to be rainwater (Refer to Photographic Log, Photo 47).

Concrete saddles for additional former ASTs are located north of the CCA Tanks (Refer to Photographic Log, Photo 48). A concrete catch/recirculation basin with a metal tank and sump on each side is located south of the CCA Tanks (Refer to Photographic Log, Photo 49). The concrete catch/recirculation basin was stained and contained liquid presumed to be rainwater during site reconnaissance. A covered concrete drip pad and treatment area is located south of the catch/recirculation basin. During site reconnaissance, staining was visible on the concrete drip pad and treatment area; in particular, dense green staining was located on the south portion of the concrete drip pad (Refer to Photographic Log, Photos 50 and 51). An approximately 18,000-gallon underground concrete containment area is located east of the CCA Tanks (Refer to Photographic Log, Photo 52). During site reconnaissance, the approximately 18,000-gallon underground concrete containment area contained liquid presumed to be rainwater with sheen on the surface (Refer to Photographic Log, Photo 53).

Near the south site boundary and the location of the former Dry Kiln, two 55-gallon drums connected by an approximately 6-inch diameter pipe were located underground and surrounded by concrete (Refer to Photographic Log, Photo 54). During site reconnaissance, these two 55-gallon drums contained water presumed to be rainwater. The purpose of these drums could not be determined.

The majority of surface water runoff flows north off the site into Dry Creek approximately 250 feet north of the site. Dry Creek flows west into Mountain Fork approximately thirteen miles downstream from the site.

A review of the Arkansas Department of Environmental Quality (ADEQ) Permit Data System (PDS) was conducted during this Pre-Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Screening Assessment (PSA) investigation and indicated that ADEQ Facility Identification Number (AFIN) 57-00020 is associated with the Lewis Lumber site. Hairrell Lumber has an inactive hazardous waste EPA identification number (ARD006348353), a Regulated Storage Tank (RST) Permit (57001609), a voided Minor Source Air Permit (2088-A), and a voided National Pollutant Discharge Elimination System (NPDES) Storm Runoff Permit (ARR00B362). In addition, according to ADEQ Office of Land Resources records, the Lewis Lumber site was registered as a Small Quantity Generator (SQG) of hazardous waste.

According to ADEQ RST records, three 5,000-gallon diesel underground storage tanks (USTs) were historically located on the Lewis Lumber site. All three tanks were initially installed in 1975 and were removed in 1989.

A review of ADEQ records indicated a history of poor hazardous waste management practices at the Lewis Lumber site including the following complaints and violations:

- Failure to submit hazardous waste annual reports by required deadlines;
- Multiple occurrences of exceeding stormwater runoff benchmarks;
- A complaint in May 1989 regarding CCA runoff from the drip pad leaving the site;
- Numerous hazardous waste management violations reported during a March 1993 Compliance Evaluation Inspection (CEI);
- Exceedance of 2088-A permit limit pertaining to the amount of logs received during an air inspection in January 2007; and
- Multiple items of concern noted in an Industrial Stormwater Compliance Inspection in April 2009 including failure to submit permit transfer paperwork, failure to prepare a Stormwater Pollution Prevention Plan (SWPPP), drums containing unknown fluids that needed to be identified and disposed of properly, large piles of discarded timber wastes and solid waste (two of which were directly on the bank of a small creek), and several areas of spilled oil-based fluids.

In addition, approximately fifty drums with varying amounts of unknown liquids and a pile of potentially contaminated debris was documented on-site during a CEI conducted in August 2012. A Notice of Violation (NOV) (LIS 13-075) was subsequently issued to Jerry Hairrell in May 2013 requiring all solid and hazardous waste on-site be identified and properly disposed, an ADEQ-approved Sampling and Analysis Plan (SAP) including a plan for the drip pad closure to be developed and implemented, and additional remedial actions based upon the results of the implemented SAP. Jerry Hairrell filed for

bankruptcy and insufficient funds were available to complete the sampling and clean-up activities outlined in the SAP. The site was abandoned upon closure of the bankruptcy case.

Based on the results of the SIP report prepared in 1994, a No Further Remedial Action Planned under Superfund decision was made for the Lewis Lumber site. The site remained active for over fifteen additional years after the report was written and ADEQ requests the site to be reevaluated under current conditions.

Pathway Assessment

The Lewis Lumber site is located in a rural residential and agricultural area in northwest Cove, Polk County, Arkansas. The site slopes down to the north at a grade of approximately five percent (5%). According to Google Earth Pro, the center of the site is approximately 1,050 feet above mean sea level. The potential pathways for human and environmental targets evaluated for this PSA include groundwater migration, surface water migration, soil exposure and subsurface intrusion (SESSI), and air migration.

Groundwater Migration

The residents of Cove are served by Gillham Regional Water District. Gillham Regional Water District's water source is surface water from Gillham Lake, not groundwater (Gillham Regional Water District 2017 Annual Drinking Water Quality Report).

According to the SAP prepared by Felton Environmental Services, Inc. for the Lewis Lumber site in August 2016, a water supply well is located on-site, northwest of the CCA Treatment Building.

The historical use of two underground 55-gallon drums, an approximately 18,000-gallon underground concrete containment area, and three former 5,000-gallon diesel USTs is an indication of the potential for historical releases from the Lewis Lumber site to the groundwater migration pathway. It is also possible that potential contamination from the soil has reached the groundwater.

Surface Water Migration

The residents of Cove are served by Gillham Regional Water District. Gillham Regional Water District's water source is surface water from Gillham Lake. Gillham Lake is located upgradient and within a different watershed than the Lewis Lumber site.

Soils at the Lewis Lumber site are well-drained and surface water runoff is moderate based on soil type. The majority of surface water runoff flows north off the site into Dry Creek approximately 250 feet north of the site. Dry Creek flows west into Mountain Fork approximately thirteen miles downstream from the site.

According to the Arkansas Watershed Information System website (<http://watersheds.cast.uark.edu>), the Lewis Lumber site is located within the Middle Mountain Fork Watershed. The average annual rainfall in Cove is approximately 56.87 inches (<http://www.idcide.com/weather/ar/cove.htm>).

The sheen on the water in the approximately 18,000-gallon underground concrete containment area is a current indication of a potential release from the Lewis Lumber site to the surface water migration pathway. Historical indications of potential releases from the Lewis Lumber site to the surface water migration pathway include: the multiple occurrences of exceeding stormwater runoff benchmarks, the complaint in May 1989 regarding CCA runoff from the drip pad leaving the site, and the two large piles of discarded timber wastes and solid waste directly on the bank of a small creek. It is also possible that potential contamination from the soil has entered the surface water.

Soil Exposure and Subsurface Intrusion

The Lewis Lumber site is bordered by a wooded area to the north; residences and North Lewis Street to the east; a wooded area and residences to the south; and an open vegetated field to the west. According to the Natural Resources Conservation Service (NRCS) Custom Soil Resource Report generated for this site, the soils are comprised of the following: 85.9% Sherless gravelly fine sandy loam, 1 to 6 percent slopes; 10.0% Dela fine sandy loam, 0 to 2 percent slopes, occasionally flooded; and 4.1% Sherless-Nashoba-Bismarck complex, 15 to 35 percent slopes, extremely stony (<http://websoilsurvey.nrcs.usda.gov>).

In addition to concrete foundations of former buildings, the remaining land cover at the site consists mostly of gravel and vegetated areas. The site is not fenced and is easily accessible to trespassers; however, a gate is located at the entrance to the site on West Mill Street. During reconnaissance, the gate was locked, making the site inaccessible by vehicle.

Current indications of potential releases from the Lewis Lumber site to the SESSI pathway include: the three CCA tanks with green staining; the concrete saddles for additional ASTs north of the CCA Tanks; the stained concrete drip pad and treatment area; a large sawdust pile located on the north-central portion of the site; and numerous debris piles, burn piles, areas of staining accompanied by hydrocarbon or chemical odors, and areas of disturbed soil located throughout the

site. Historical indications of potential releases from the Lewis Lumber site to the SESSI pathway include: a complaint in May 1989 regarding CCA runoff from the drip pad leaving the site; the numerous hazardous waste management violations reported during a March 1993 CEI; the drums containing unknown fluids that needed to be identified and disposed of properly, large piles of discarded timber wastes and solid waste, and several areas of spilled oil-based fluids noted in an Industrial Stormwater Compliance Inspection in April 2009; and the approximately fifty drums with varying amounts of unknown liquids and the pile of potentially contaminated debris documented on-site during a CEI conducted in August 2012.

Air Migration

Cove, which had a population of approximately 373 people in 2014, is located in western Polk County, which had a population of 20,425 people in 2016 (<http://www.city-data.com>). MARPLOT[®] software, which includes United States Census Bureau information for the year 2010, was used to derive the following population estimates for the site: 6 people reside within a 0.25-mile radius; 92 people reside within a 0.50-mile radius; 337 people reside within a 1-mile radius; 779 people reside within a 2-mile radius; 1,142 people reside within a 3-mile radius; and 1,909 people reside within a 4-mile radius. The nearest residence is located adjacent to the east portion of the site, on the south side of West Mill Street. Cove First Baptist Church is located 0.32 miles southeast, Emmanuel Missionary Church is located 0.37 miles southeast, and Pleasant Grove Church of the Nazarene is located 1.13 miles southeast of the Lewis Lumber site. Because the site mostly consists of gravel and vegetated areas, dust dispersion is of minimal concern. In addition, no blowing particulate was noted during site reconnaissance.

There are no current indications of potential releases from the Lewis Lumber site to the air migration pathway. The exceedance of 2088-A permit limit pertaining to the amount of logs received during an air inspection in January 2007 is an indication of potential historical releases to the air migration pathway.

Summary and Conclusions

Throughout its operational history, the Lewis Lumber site was used as a lumber mill and wood treating facility. Lewis Lumber began lumber mill operations on-site in 1958 and began wood treating in 1976. Lewis Lumber operated on-site until 2009, when the property was sold to Jerry Hairrell and Hairrell Lumber began operations. Hairrell Lumber closed and ceased operations on December 30, 2010 due to bankruptcy. The site has remained inactive since this time.

A review of the ADEQ PDS was conducted during this PSA investigation and indicated that AFIN 57-00020 is associated with the Lewis Lumber site. Hairrell Lumber has an inactive hazardous waste EPA identification number (ARD006348353), an RST Permit (57001609), a voided Minor Source Air Permit (2088-A), and a voided NPDES Storm Runoff Permit (ARR00B362). In addition, according to ADEQ Office of Land Resources records, the Lewis Lumber site was registered as a SQG of hazardous waste.

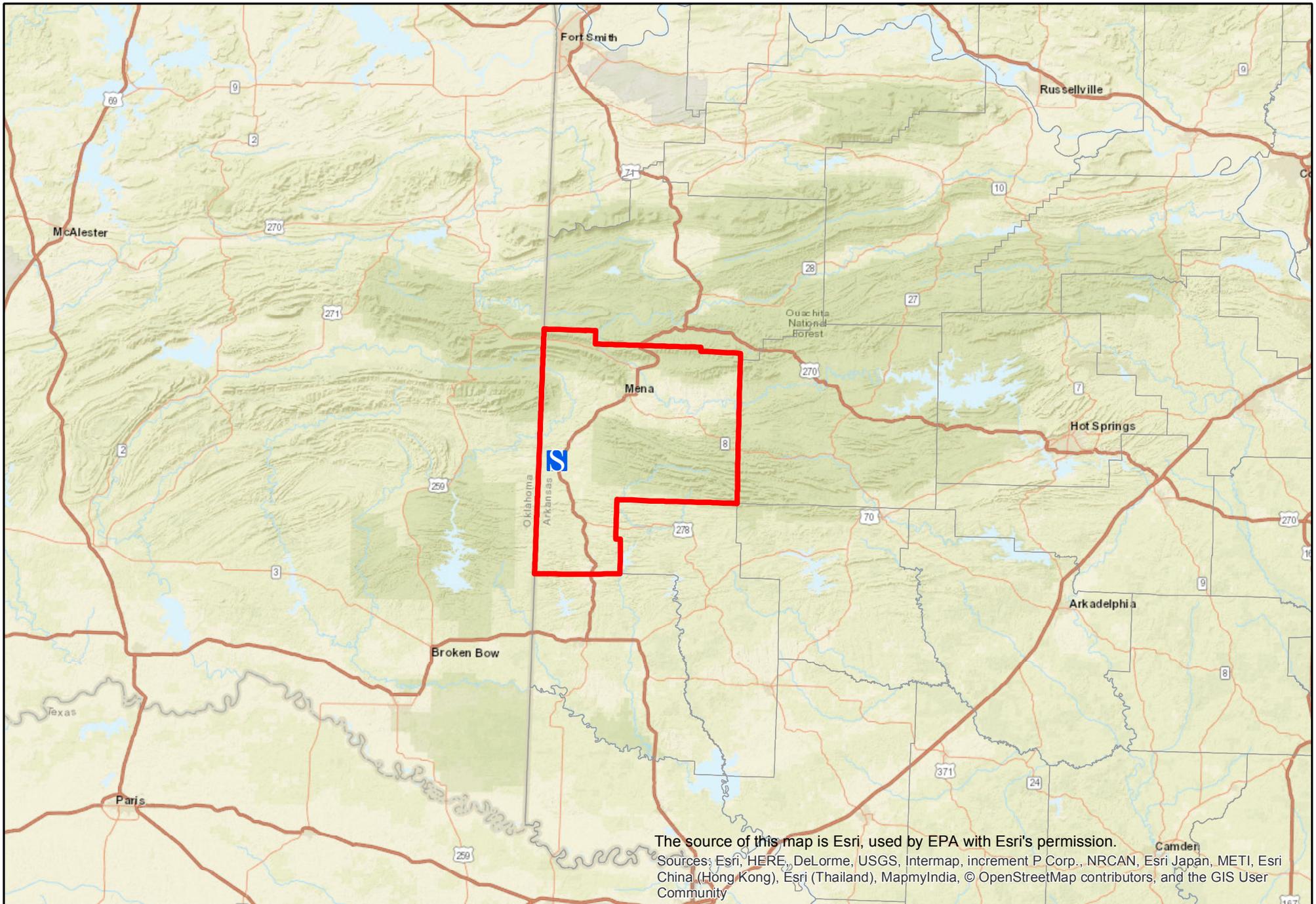
A review of ADEQ records indicated a history of poor hazardous waste management practices at the Lewis Lumber site including the following complaints and violations:

- Failure to submit hazardous waste annual reports by required deadlines;
- Multiple occurrences of exceeding stormwater runoff benchmarks;
- A complaint in May 1989 regarding CCA runoff from the drip pad leaving the site;
- Numerous hazardous waste management violations reported during a March 1993 CEI;
- Exceedance of 2088-A permit limit pertaining to the amount of logs received during an air inspection in January 2007; and
- Multiple items of concern noted in an Industrial Stormwater Compliance Inspection in April 2009 including failure to submit permit transfer paperwork, failure to prepare a SWPPP, drums containing unknown fluids that needed to be identified and disposed of properly, large piles of discarded timber wastes and solid waste (two of which were directly on the bank of a small creek), and several areas of spilled oil-based fluids.

In addition, approximately fifty drums with varying amounts of unknown liquids and a pile of potentially contaminated debris was documented on-site during a CEI conducted in August 2012. A NOV (LIS 13-075) was subsequently issued to Jerry Hairrell in May 2013 requiring all solid and hazardous waste on-site be identified and properly disposed, an ADEQ-approved SAP including a plan for the drip pad closure to be developed and implemented, and additional remedial actions based upon the results of the implemented SAP. Jerry Hairrell filed for bankruptcy and insufficient funds were available to complete the sampling and clean-up activities outlined in the SAP. The site was abandoned upon closure of the bankruptcy case.

Based on the results of the SIP report prepared in 1994, a No Further Remedial Action Planned under Superfund decision was made for the Lewis Lumber site. The site remained active for over fifteen additional years after the report was written and had a history of hazardous waste generation and poor waste management practices. ADEQ is recommending further investigation be conducted to reevaluate the Lewis Lumber site under current conditions.

ATTACHMENT B:
SITE LOCATION AND COUNTY MAP



Attachment B
Lewis Lumber and Manufacturing Company
Site Location and County Map

Legend:

- Polk County
- S Site Location

0 5 10 20 Miles

 ADEQ <small>ARKANSAS</small> <small>Department of Environmental Quality</small>	Site Location and County Map
	Location: Cove, Arkansas
AFIN: 57-00020	County: Polk
	Date: July 2018

ATTACHMENT C:

SITE MAP

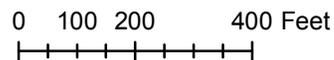


Attachment C
Lewis Lumber and Manufacturing Company
Site Map

Legend:

- Site Boundary
- ↗ Site Drainage

▶ Flow Direction



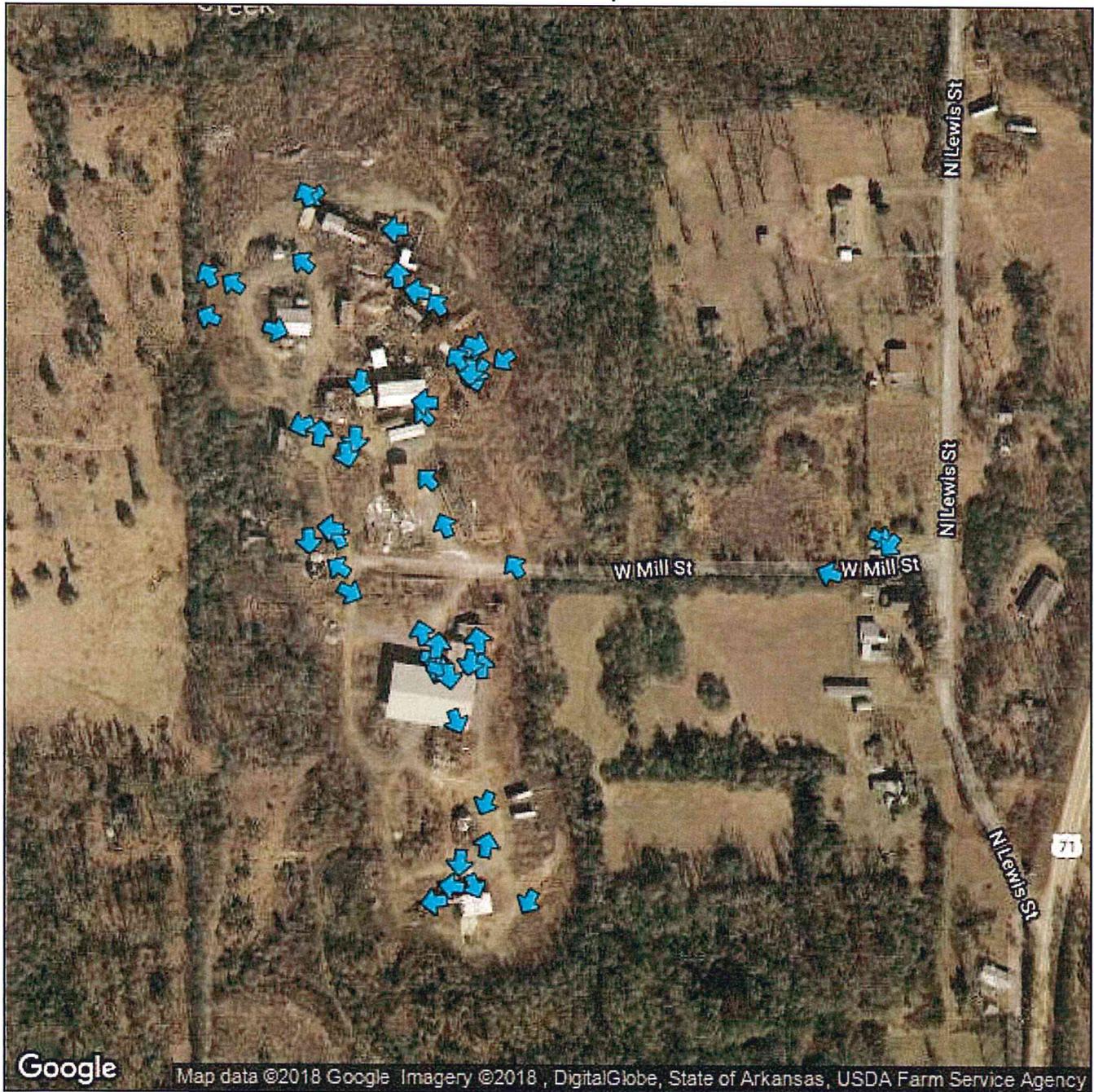
Site Map	
Location:	Cove, Arkansas
County:	Polk
Date:	July 2018

AFIN:
57-00020

ATTACHMENT D:
PHOTOGRAPHIC LOG



Overview Map

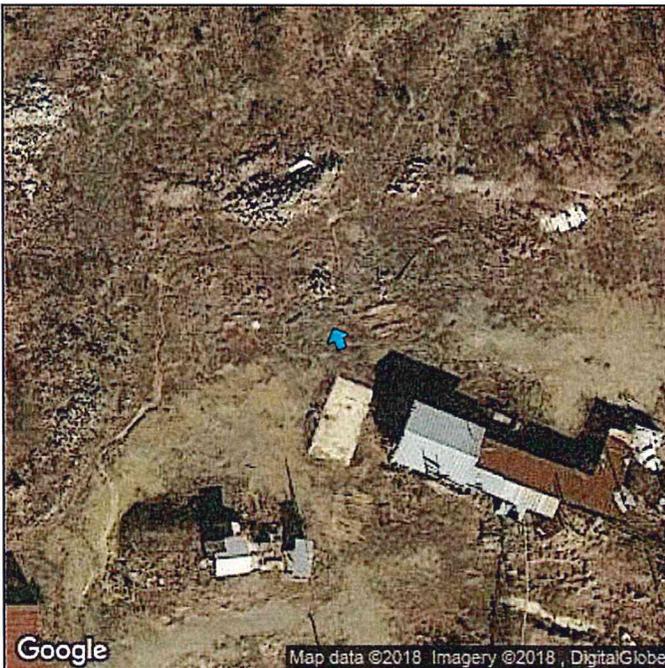


Lewis Lumber and Manufacturing Company



N 34° 26' 31.32"
W 94° 24' 57.51"

5/30/2018 12:45:45 PM
RIMG0032.JPG



Attributes	
Photo Number	1
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:45:45 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0032.JPG
Subject	Wooded area north of the site; staining and debris piles containing wood

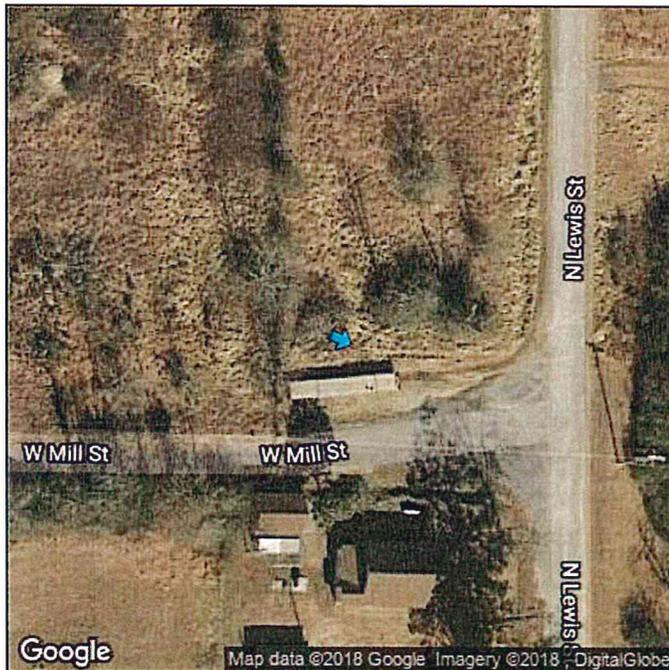
MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 25.31"
W 94° 24' 45.16"

5/30/2018 11:53:17 AM
RIMG0001.JPG



Attributes	
Photo Number	2
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 11:53:17 AM
Make	RICOH
Model	G700 SE
File Name	RIMG0001.JPG
Subject	North Lewis Street and residence east of the site

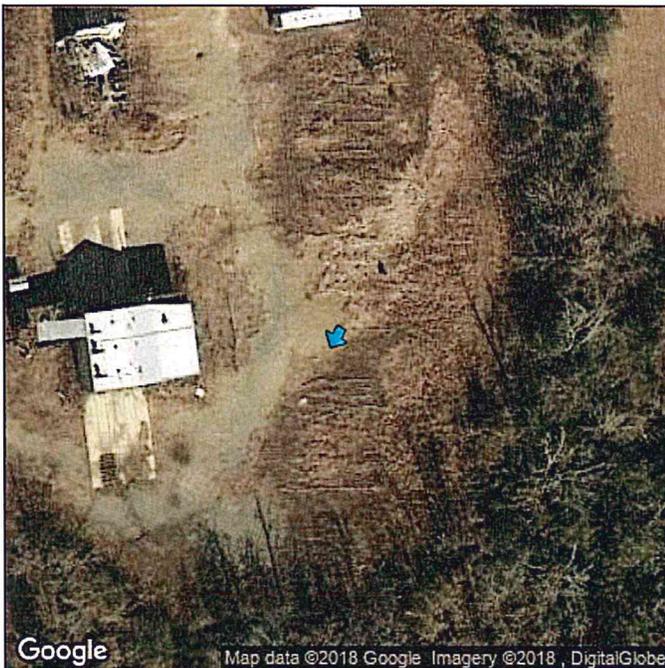
MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 18.85"
W 94° 24' 52.74"

5/30/2018 1:26:00 PM
RIMG0067.JPG



Google

Map data ©2018 Google Imagery ©2018, DigitalGlobe

Attributes	
Photo Number	3
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:26:00 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0067.JPG
Subject	Wooded area south of the site

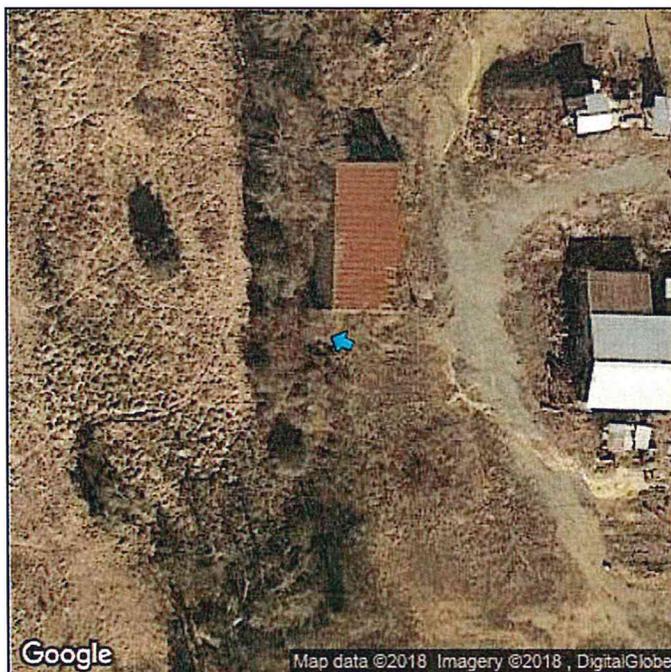
MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 29.17"
 W 94° 24' 59.59"

5/30/2018 12:53:11 PM
 RIMG0036.JPG



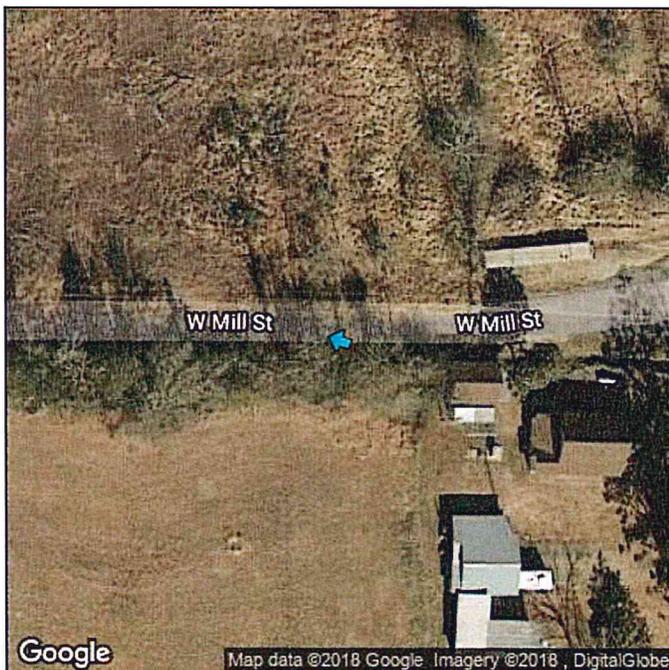
Attributes	
Photo Number	4
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:53:11 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0036.JPG
Subject	Open vegetated field west of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 24.67"
 W 94° 24' 46.31"

5/30/2018 11:55:33 AM
 RIMG0003.JPG



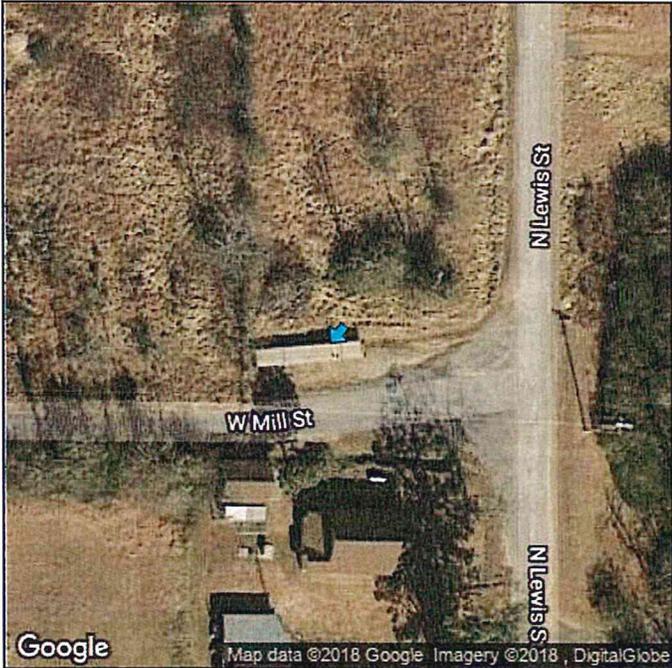
Attributes	
Photo Number	5
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 11:55:33 AM
Make	RICOH
Model	G700 SE
File Name	RIMG0003.JPG
Subject	West Mill Street intersecting the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 25.17"
 W 94° 24' 44.98"

5/30/2018 11:54:07 AM
 RIMG0002.JPG



Attributes	
Photo Number	6
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 11:54:07 AM
Make	RICOH
Model	G700 SE
File Name	RIMG0002.JPG
Subject	Locked gate at the entrance to the site on West Mill Street

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 27.45"
 W 94° 24' 54.97"

5/30/2018 12:10:07 PM
 RIMG0012.JPG



Google Map data ©2018 Google Imagery ©2018 DigitalGlobe

Attributes	
Photo Number	7
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:10:07 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0012.JPG
Subject	Concrete foundation and demolition debris in location of former building on the north-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	8
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:13:02 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0015.JPG
Subject	Concrete foundation and demolition debris in location of former building on the north-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	9
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:16:10 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0016.JPG
Subject	Demolition debris in location of former building on the north-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	10
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:20:14 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0018.JPG
Subject	Demolition debris in location of former building on the northeast portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 29.41"
 W 94° 24' 54.69"

5/30/2018 12:29:47 PM
 RIMG0025.JPG



Attributes	
Photo Number	11
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:29:47 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0025.JPG
Subject	Concrete foundation in location of former building on the north-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	12
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:31:53 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0027.JPG
Subject	Demolition debris and disturbed soil in location of former building on the northeast portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	13
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KL</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:37:20 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0028.JPG
Subject	Demolition debris in location of former building on the northern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	14
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:42:43 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0031.JPG
Subject	Concrete foundation on the northern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 30.13"
W 94° 24' 57.57"

5/30/2018 12:47:30 PM
RIMG0033.JPG



Attributes	
Photo Number	15
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:47:30 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0033.JPG
Subject	Concrete foundation and demolition debris in location of former building on the northwest portion of the site

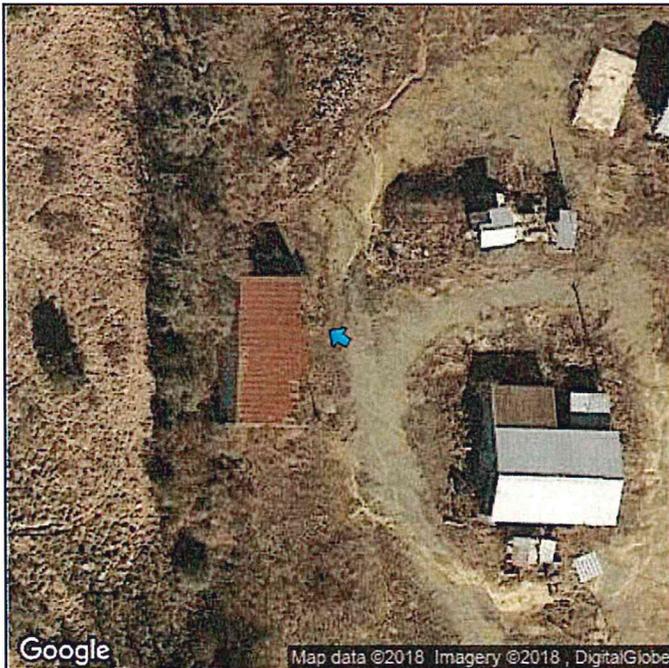
MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 29.74"
 W 94° 24' 59.04"

5/30/2018 12:49:42 PM
 RIMG0034.JPG



Attributes	
Photo Number	16
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:49:42 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0034.JPG
Subject	Concrete foundation and demolition debris in location of former building on the northwest portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	17
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KL</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:57:47 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0040.JPG
Subject	Concrete foundation and demolition debris in location of former building on the west portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	18
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:58:33 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0041.JPG
Subject	Demolition debris in location of former building on the north-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



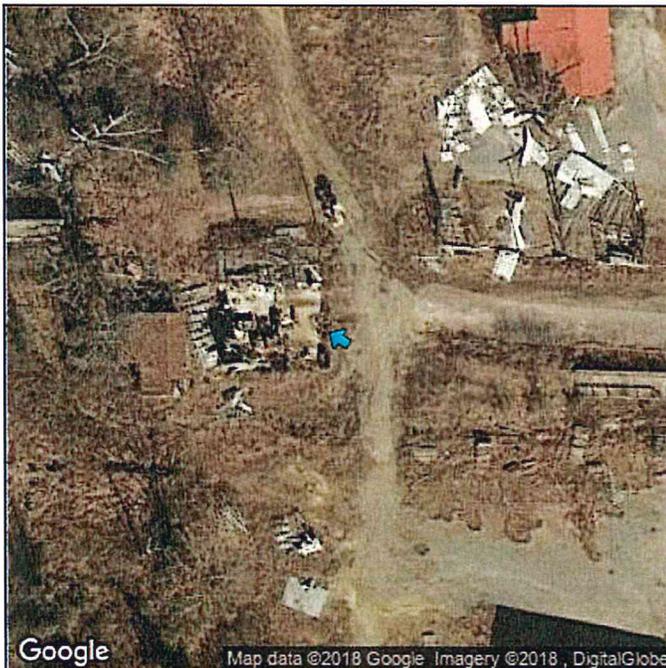
Attributes	
Photo Number	19
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:02:04 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0044.JPG
Subject	Demolition debris in location of former building on the west portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 24.72"
 W 94° 24' 56.76"

5/30/2018 1:03:09 PM
 RIMG0045.JPG



Attributes	
Photo Number	20
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KE</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:03:09 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0045.JPG
Subject	Concrete foundation with staining in location of former building on the west portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



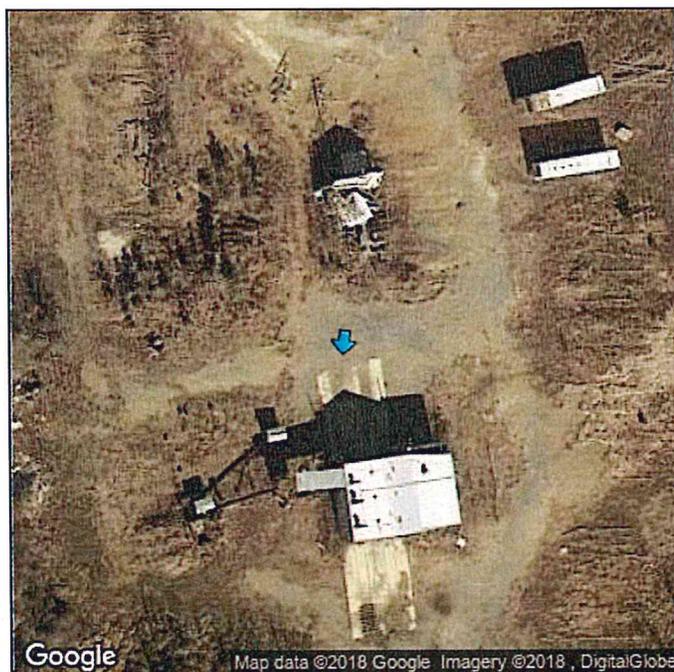
N 34° 26' 20.57"
 W 94° 24' 53.65"

5/30/2018 1:19:15 PM
 RIMG0060.JPG



Attributes	
Photo Number	21
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:19:15 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0060.JPG
Subject	Demolition debris in location of former building on the south-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	22
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:21:01 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0062.JPG
Subject	Concrete foundation in location of former Dry Kiln on the southern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	23
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:17:29 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0017.JPG
Subject	Empty 5-gallon hydraulic fluid buckets in debris pile on the north-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	24
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:26:11 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0023.JPG
Subject	Empty 5-gallon hydraulic fluid bucket near debris pile on the northeast portion of the site

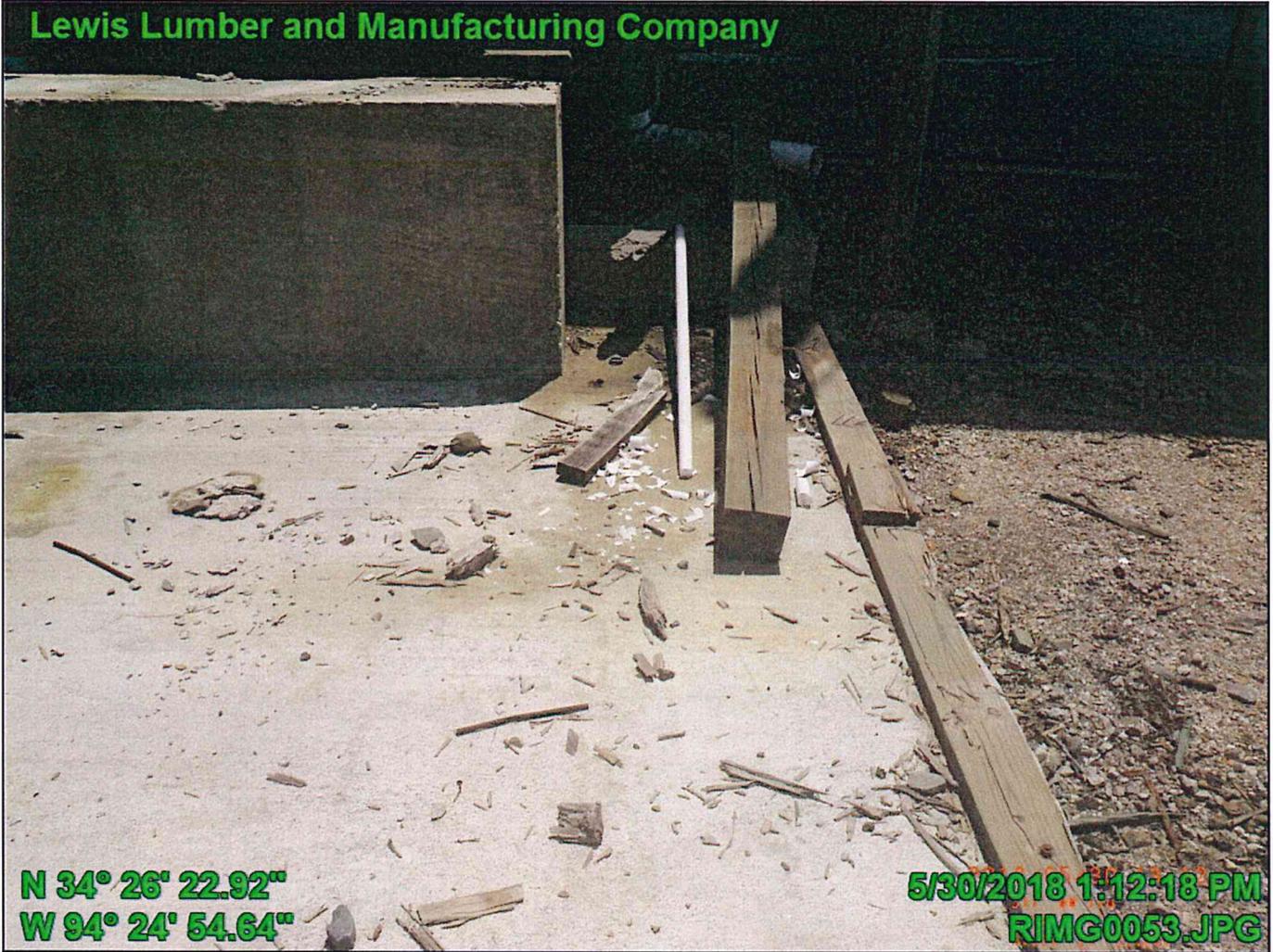
MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	25
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:11:18 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0013.JPG
Subject	Broken universal waste bulb near debris pile on the north-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 22.92"
W 94° 24' 54.64"

5/30/2018 1:12:18 PM
RIMG0053.JPG



Google

Map data ©2018, Google Imagery ©2018, DigitalGlobe

Attributes	
Photo Number	26
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:12:18 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0053.JPG
Subject	Broken universal waste bulb near the CCA Treatment Building on the southern portion of the site

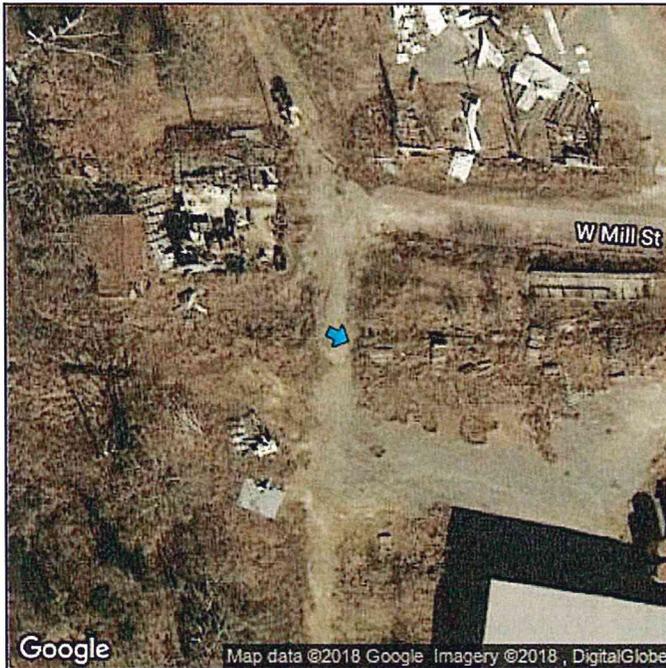
MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 24.26"
W 94° 24' 56.51"

5/30/2018 1:04:00 PM
RIMG0046.JPG



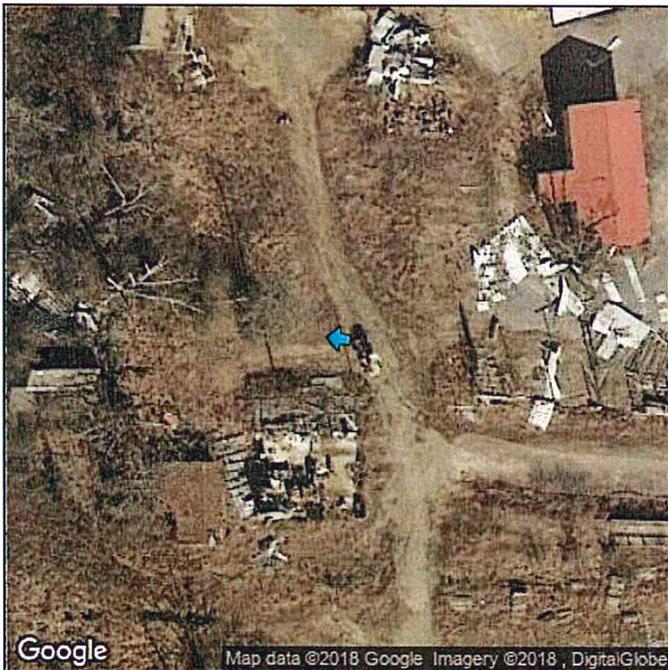
Attributes	
Photo Number	27
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:04:00 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0046.JPG
Subject	CCA Treatment Building on the southern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 25.43"
 W 94° 24' 56.97"

5/30/2018 1:00:36 PM
 RIMG0043.JPG



Attributes	
Photo Number	28
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:00:36 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0043.JPG
Subject	Former residence on west portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 25.51"
 W 94° 24' 54.56"

5/30/2018 12:05:57 PM
 RIMG0009.JPG



Attributes	
Photo Number	29
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:05:57 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0009.JPG
Subject	Office on the northern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



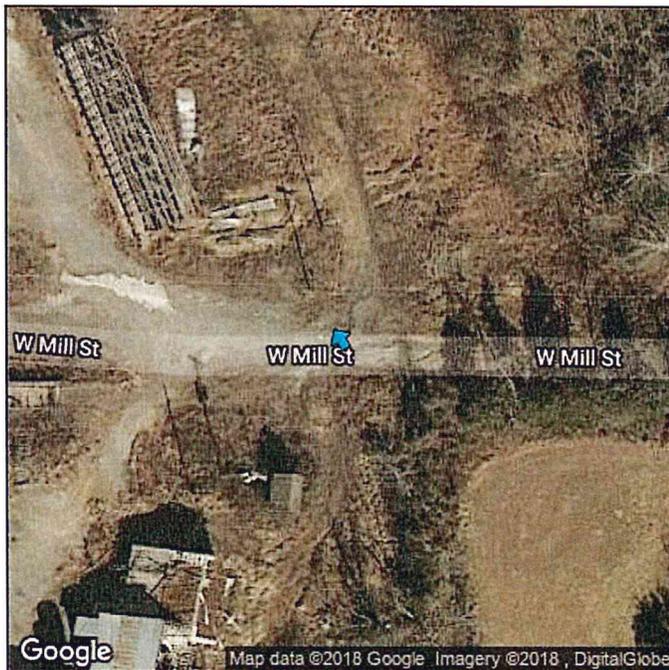
N 34° 26' 26.31"
W 94° 24' 54.88"

5/30/2018 12:07:49 PM
RIMG0010.JPG



Attributes	
Photo Number	30
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:07:49 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0010.JPG
Subject	Break building and debris pile on the northern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



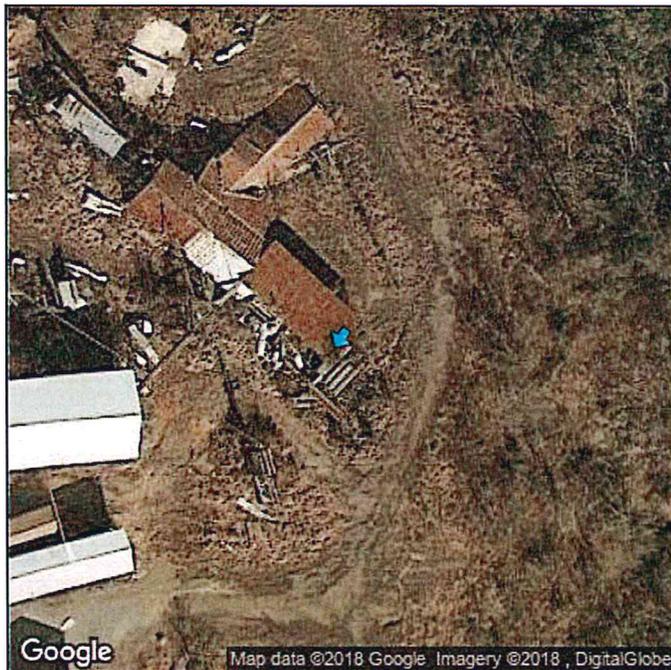
Attributes	
Photo Number	31
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:01:37 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0005.JPG
Subject	Wooden frame of plywood storage building on the northern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 28.22"
W 94° 24' 53.77"

5/30/2018 12:23:15 PM
RIMG0020.JPG



Attributes	
Photo Number	32
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:23:15 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0020.JPG
Subject	Areas of staining and burn piles on the northeast portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	33
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:24:43 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0021.JPG
Subject	Area of staining on the northeast portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 28.69"
 W 94° 24' 53.86"

5/30/2018 12:24:56 PM
 RIMG0022.JPG



Attributes	
Photo Number	34
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:24:56 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0022.JPG
Subject	Area of staining on the northeast portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 28.43"
 W 94° 24' 54.28"

5/30/2018 12:27:31 PM
 RIMG0024.JPG



Attributes	
Photo Number	35
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:27:31 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0024.JPG
Subject	Staining and demolition debris on the northeast portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



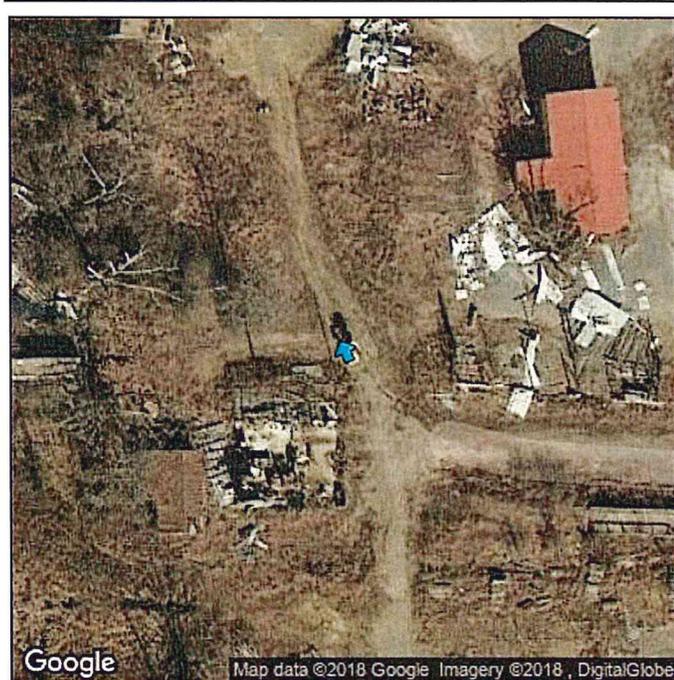
N 34° 26' 29.90"
 W 94° 24' 59.60"

5/30/2018 12:51:40 PM
 RIMG0035.JPG



Attributes	
Photo Number	36
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:51:40 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0035.JPG
Subject	Staining and debris on concrete foundation on the northwest portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	37
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:00:08 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0042.JPG
Subject	Staining on the west portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 23.58"
W 94° 24' 55.03"

5/30/2018 1:05:28 PM
RIMG0048.JPG



Attributes	
Photo Number	38
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:05:28 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0048.JPG
Subject	Staining on the southern portion of the site, north of the CCA Treatment Building

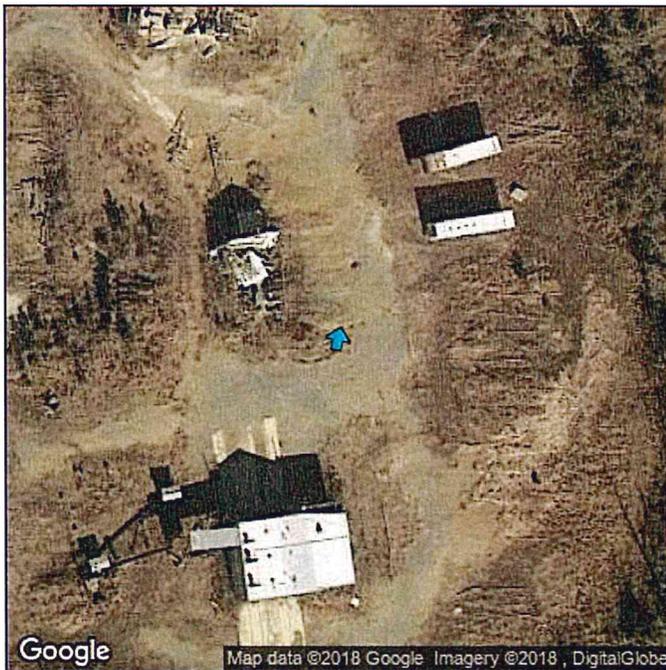
MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 19.85"
W 94° 24' 53.62"

5/30/2018 1:20:12 PM
RIMG0061.JPG



Google
 Map data ©2018 Google Imagery ©2018, DigitalGlobe

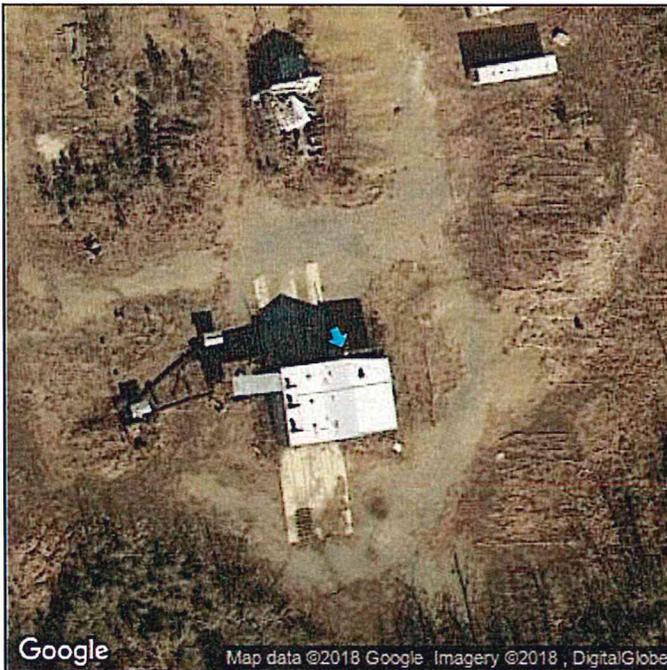
Attributes	
Photo Number	39
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:20:12 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0061.JPG
Subject	Staining on the south-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 19.11"
 W 94° 24' 53.88"

5/30/2018 1:22:04 PM
 RIMG0063.JPG



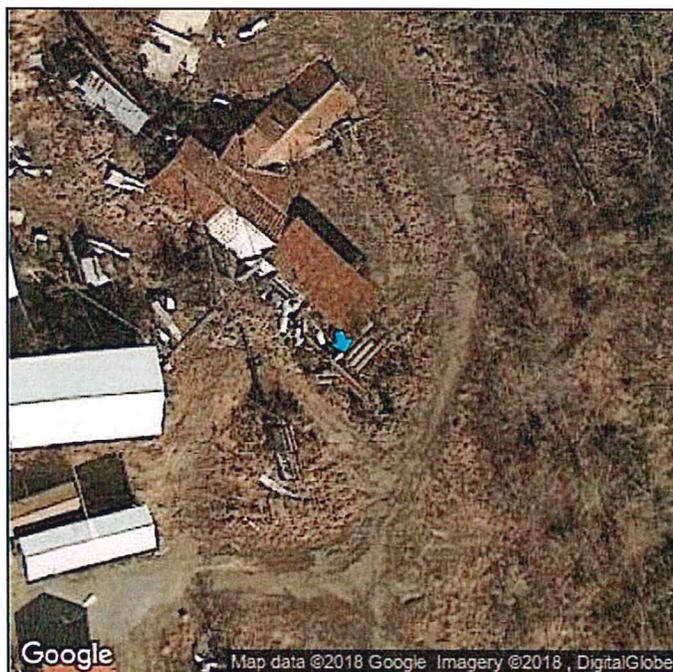
Attributes	
Photo Number	40
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:22:04 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0063.JPG
Subject	Staining on concrete foundation of the former Dry Kiln on the southern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	41
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:23:58 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0065.JPG
Subject	Staining west of the former Dry Kiln on the southern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	42
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:21:59 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0019.JPG
Subject	Burn pile on the northeast portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 28.96"
W 94° 24' 58.15"

5/30/2018 12:55:33 PM
RIMG0039.JPG



Google

Map data ©2018 Imagery ©2018 DigitalGlobe

Attributes	
Photo Number	43
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:55:33 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0039.JPG
Subject	Staining in the shape of rings on a concrete foundation on the northern portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



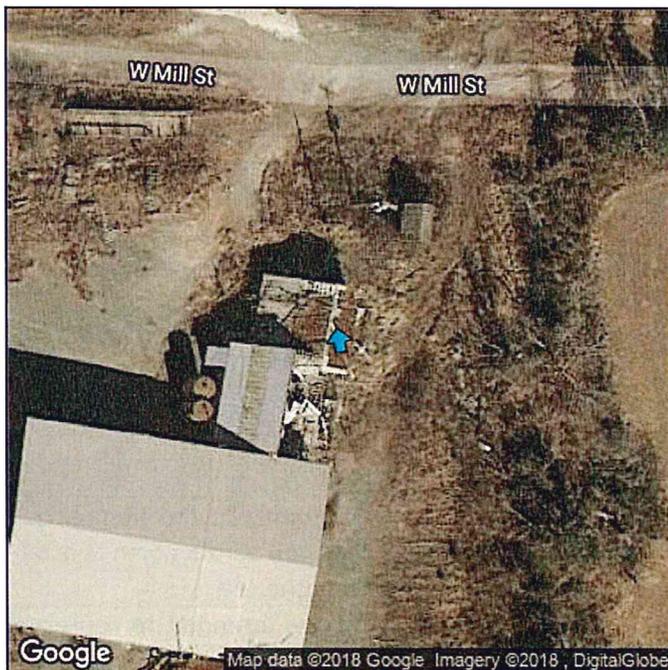
Attributes	
Photo Number	44
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 12:30:57 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0026.JPG
Subject	Large sawdust pile and areas of disturbed soil on the north-central portion of the site

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 23.46"
W 94° 24' 53.81"

5/30/2018 1:32:15 PM
RIMG0073.JPG



Attributes	
Photo Number	45
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:32:15 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0073.JPG
Subject	Staining on concrete near the CCA Treatment Building

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

(For Pressure Plant Use Only)

Wood Chemicals Group CCA-C (50%) is designed for the pressure impregnation of wood to provide protection against decay, termites and other insects (Larvae and Pupae).

Processes used to apply inorganic arsenical formulations shall leave no visible surface deposits on the wood as defined by ASTM Standard C1 and ANSI Standards LP2 and LP22. (Visible surface deposits present a surface reaction or crystallization on the treated wood. Small isolated or infrequent spots of residual on otherwise clean wood shall be allowed.)

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not apply directly to water. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL OR CHEMICAL HAZARDS

Avoid contact with aluminum or zinc galvanized metal.

Note to User: Elements of arsenical materials for protective clothing (e.g., gloves, overalls, jackets, and boots) removed during application and handling of inorganic arsenicals are vinyl, polyvinyl chloride (PVC), neoprene, NBR (Blue-N), rubber, and polyethylene.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer recycling or reconditioning or purchase and disposal of in a sanitary landfill, or by other approved state and local procedures.

RESTRICTED USE PESTICIDE

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only those uses covered by the Certified Applicator's Certification.

**WOOD CHEMICALS GROUP
CCA-C (50%)
WOOD PRESERVATIVE**

(For Pressure Plant Use Only)
(Not For Use Or Storage In Or Around The Home)

ACTIVE INGREDIENTS:

Arsenic Pentoxide	17.00%
Copper Oxide	0.20%
Chromic Acid	23.75%
INERT INGREDIENT:	
Water	50.00%
Water Soluble Arsenic as Elemental	100.0%
Arsenic as Elemental Arsenic	11.00%
Water Soluble Arsenic as Elemental	11.00%

KEEP OUT OF REACH OF CHILDREN

ANGER POISON

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Induce vomiting by touching the back of the throat with finger. Avoid aspiration of vomit. Do not induce vomiting of an unconscious person. Call a physician immediately.

IF INHALED: Remove victim to fresh air. Apply respiration if indicated. Call a physician immediately.

IF ON SKIN: Remove contaminated clothing and wash affected area with soap and water.

IF IN EYES: Flush eyes with plenty of water. Call a physician immediately.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
EPA Est. 3008-TN-1 EPA Reg. No. 3008-36-57189

DISTRIBUTED BY: P.O. DRAWER O
Griffin, GA 30224

NET CONTENTS

**PRECAUTIONARY STATEMENT
HAZARDS TO HUMANS
& DOMESTIC ANIMALS
DANGER: POISONOUS IF
SWALLOWED OR ABSORBED
THROUGH THE SKIN**

Causes eye and skin irritation. Do not breathe vapor. Do not get in eyes, on skin, or on clothing. Wash thoroughly after handling and before eating or smoking. Wear eye protection device and protective clothing and rubber gloves in all situations where dermal contact is expected. In case of contact flush skin or eyes with plenty of water. For eyes get medical attention. Wash clothing before reuse. Do not breathe vapor mist.

Applicators must wear gloves impervious to the wood treatment formulation in all situations where dermal contact is expected (e.g., handling, treating, treated wood and manually opening cylinder doors).

Individuals who enter pressure treatment cylinders and other related equipment that is contaminated with the wood treatment solution (e.g., cylinders that are in operation or are not free of the treatment solution) must wear protective clothing, including overalls, jacket, gloves, and boots, impervious to the wood treatment formulation. In addition, individuals who enter pressure treatment cylinders must wear properly fitting, well-maintained, high efficiency filter respirators, MSHA/NIOSH approved for inorganic arsenic, if the level of inorganic arsenic in the plant is unknown or exceeds 10 micrograms per cubic meter of air (10µg/m³) average over an 8-hour work period. Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

Applicators must not eat, drink, or use tobacco products during the period of the application process that may expose them to the wood treatment formulation (e.g., manually opening/closing cylinder doors, moving tanks out of cylinders, mixing chemicals, and handling freshly treated wood).

Wash thoroughly after skin contact, and before eating, drinking, use of tobacco products, or using restrooms.

Protective clothing must be changed when it shows signs of contamination. Applicators must leave protective clothing and workboots or boots and equipment at the plant. Worn-out protective clothing and workboots or boots must be left at the plant and disposed of in a manner approved for pesticide disposal and in accordance with state and federal regulations.

Individuals in the work area of an arsenical wood treatment plant must wear properly fitting, well-maintained high efficiency filter respirators, MSHA/NIOSH approved for inorganic arsenic, if the level of inorganic arsenic in the plant is unknown or exceeds 10 micrograms per cubic meter of air (10µg/m³) average over an 8-hour work period. Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

N 34° 26' 23.12"
W 94° 24' 54.72"

5/30/2018 1:08:35 PM
RIMG0049.JPG



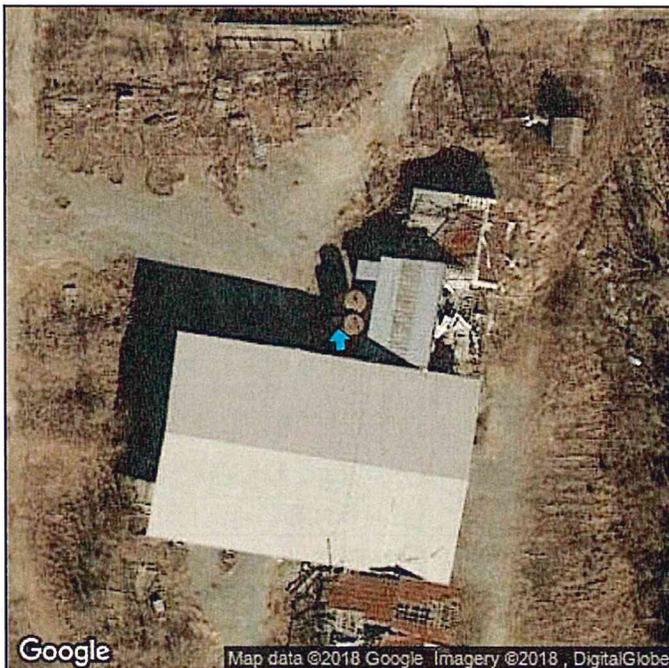
Attributes	
Photo Number	46
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:08:35 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0049.JPG
Subject	Label on CCA Tank

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



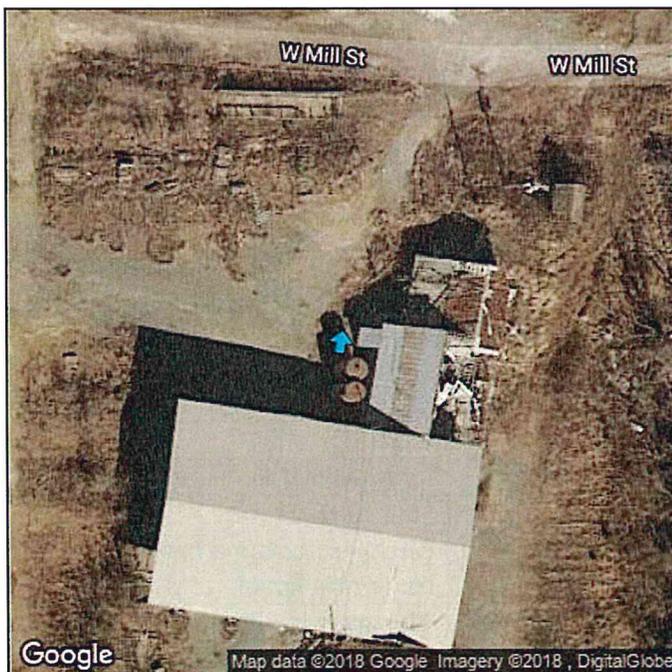
N 34° 26' 23.05"
 W 94° 24' 54.69"

2018-05-30 13:09
 5/30/2018 1:09:25 PM
 RIMG0050.JPG



Attributes	
Photo Number	47
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:09:25 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0050.JPG
Subject	Green staining on the CCA Tanks and inside the concrete containment area with liquid

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	48
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:11:16 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0052.JPG
Subject	Concrete saddles for ASTs north of the CCA Tanks

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



N 34° 26' 22.94"
W 94° 24' 54.61"

5/30/2018 1:13:35 PM
RIMG0055.JPG



Attributes	
Photo Number	49
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:13:35 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0055.JPG
Subject	Stained concrete catch/recirculation basin containing liquid

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	50
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:14:57 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0057.JPG
Subject	Covered concrete drip pad and treatment area with staining

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



N 34° 26' 22.02"
 W 94° 24' 54.26"

5/30/2018 1:17:36 PM
 RIMG0059.JPG



Attributes	
Photo Number	51
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:17:36 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0059.JPG
Subject	Dense green staining on the south portion of the concrete drip pad

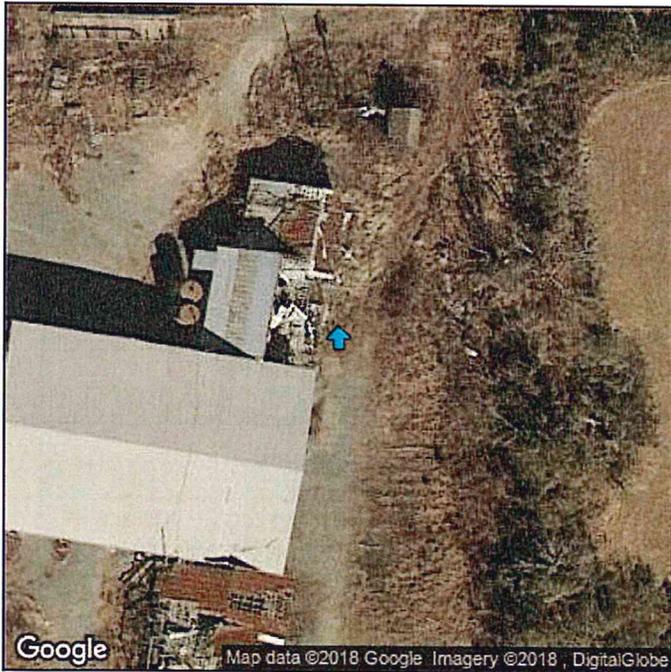
MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.

Lewis Lumber and Manufacturing Company



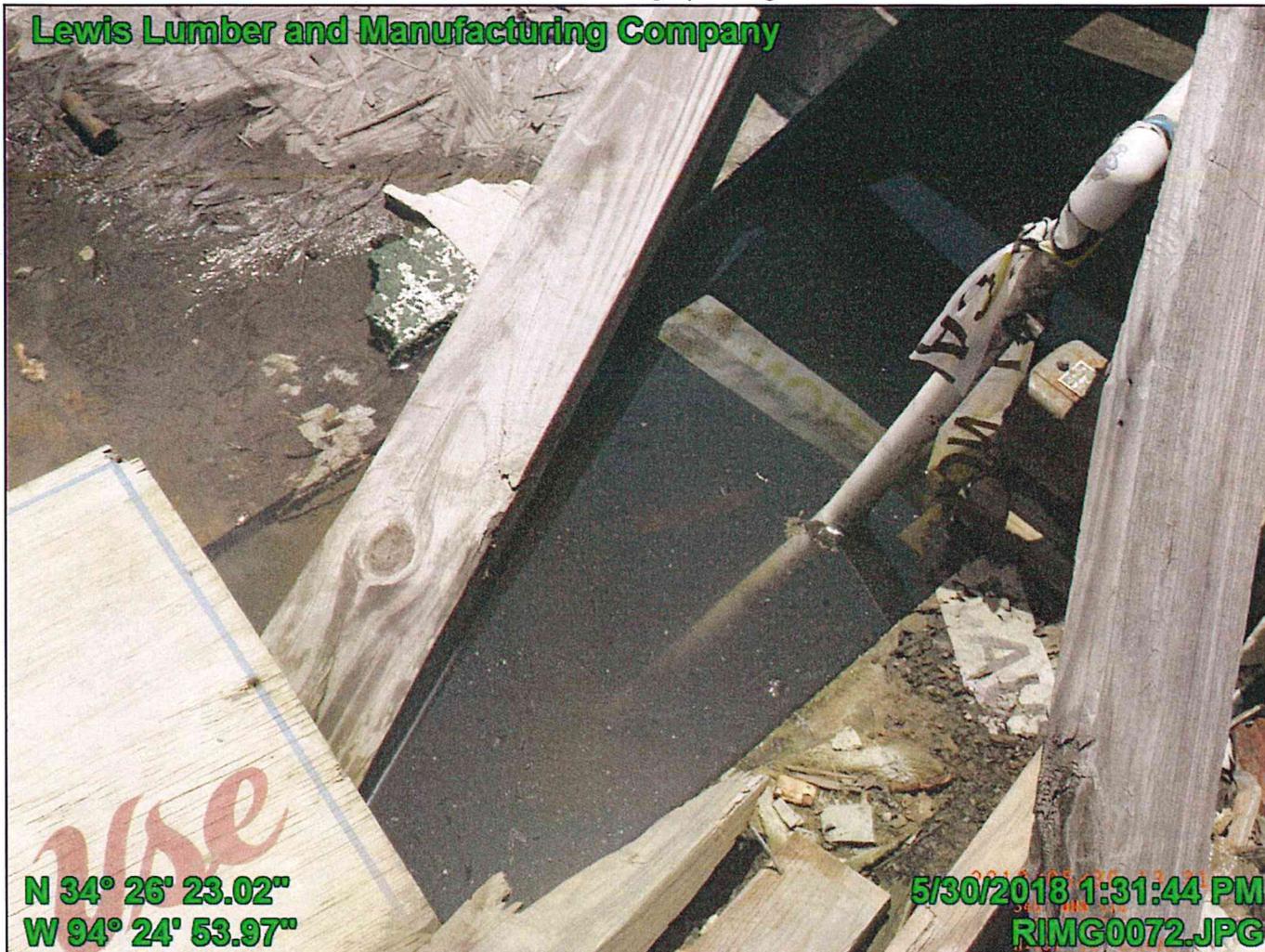
N 34° 26' 23.02"
 W 94° 24' 53.72"

5/30/2018 1:29:04 PM
 RIMG0069.JPG



Attributes	
Photo Number	52
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:29:04 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0069.JPG
Subject	Debris and approximately 18,000-gallon underground concrete containment area east of the CCA Tanks

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	53
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:31:44 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0072.JPG
Subject	Liquid with sheen on the surface in the approximately 18,000-gallon underground concrete containment area

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.



Attributes	
Photo Number	54
Facility	Lewis Lumber and Manufacturing Company
Event	Pre-CERCLA Screening Assessment
AFIN	57-00020
Photographer	Joshua Graham <i>JG</i>
Witness	Katie Kreps <i>KK</i>
Site Location	Cove, AR
Date/Time	5/30/2018 1:22:45 PM
Make	RICOH
Model	G700 SE
File Name	RIMG0064.JPG
Subject	Two underground 55-gallon drums surrounded by concrete near the south site boundary and location of former Dry Kiln

MAP DISCLAIMER: This map is intended to represent the general locations of the features displayed. This map should for reference purposes only. All GPS locations are mapping grade in accuracy and are not post-processed.