EXHIBIT A:

STATEMENT OF BASIS & PURPOSE

Statement of Basis and Purpose

The Arkansas Department of Environmental Quality maintains and administers a hazardous substance site cleanup program to implement the provisions of the Arkansas Remedial Action Trust Fund Act (RATFA), (Arkansas Code Annotated §§ 8-7-501 *et seq*.)

The background, purpose, and specific need for each revision is discussed separately below.

1. National Priority List Sites

Arkansas has fourteen sites listed on the U.S. Environmental Protection Agency's National Priority List, commonly known as "Superfund sites" after the corresponding federal cleanup program. At this time, all of these sites have completed the remedial action phase and entered (or are transitioning into) the operations and maintenance (or "O&M") phase, where long term care and stewardship of the remedy implemented at each site is the responsibility of the State. At a minimum, each site is to be reviewed every five years to ensure that the remedial actions carried out at the site remain effective and the site poses no unacceptable risk to human health or the environment. In some cases funding and implementation of O&M at each site is the responsibility of the responsible parties or current land owners, in others these responsibilities are overseen and carried out by ADEQ.

With all current Superfund sites now in O&M, ADEQ is proposing to list all eligible sites on the National Priority List section of Regulation No. 32, since further responsibilities for maintenance and oversight must be carried out or overseen by the Department, and in the event that current responsible parties default on their obligations, funds from the Remedial Action Trust Fund must be available to address those responsibilities.

2. State Priority List Sites

(a) Merger of Investigative and Remediation Categories.

Previously, sites on the State Priority List were listed separately, depending whether they were proposed for investigation and characterization of the nature and extent of any known or suspected contamination with hazardous substances, and for the actual remedial design and cleanup activities once the nature and extent of contamination was confirmed. The separate listing process required individual rulemaking decisions to proceed from investigation of a particular site to its ultimate remediation, and to save time the Department would commonly simultaneously list a site for both investigation and remediation. To streamline this process and the Department's response to these sites, we propose to merge the two lists into a single list which addresses and authorizes the use of the Trust Fund for either investigation or remediation, or both, as may be appropriate.

The format of the previous listings, using simply the site name and a citation to the nearest town or city, often created confusion within the Department as well as the general

public as to which facility was being referred to, as well as difficulty in identifying the location, background, and previous history of a site when performing site assessments or investigations of neighboring properties. The remedy these problems, the following information has been added to the table identifying the listed sites:

(1) *EPA Identification Number* (EPAID): This is the unique 12-character identifier used in EPA's CERCLIS, RCRAInfo, and/or FINDS data systems to identify facilities which generate or manage hazardous wastes, or where hazardous substance problems have been identified in the past.

(2) *Arkansas Facility Identification Number* (AFIN): This is a seven-digit identifier consisting of a two-digit prefix identifying the county in which the site or facility is located, and a five digit number identifying the specific facility, used as the index or primary key in ADEQ's Permit Data System (PDS) and central records repository. Users can use the AFIN listed for each site to locate and access the supporting records and other documentation concerning the background and history of the site as well as past and ongoing investigation and remediation work.

(3) *Site Name*: This is the company or facility name under which the site is listed in RCRAInfo and/or the Department's PDS and central files repository.

(4) *Address*: The physical address of the site. Where there is no longer an active company at the site or there is no valid 911 address, this lists either a directional location as recorded in the Department's data system or geographical coordinates (latitude and longitude) measured by GPS and recorded in the Department's PDS.

(5) *City*: The city or municipality listed in the site address, or in cases where there is no valid mailing address, the city or municipality closest to the site.

(6) *ZIP Code*: The U.S. Postal ZIP code for the city listed in the site address, or physically closest to the site.

(7) *County*: The county in which the site is located.

(b) Sites Proposed for Deletion from the State Priority List

ADEQ is proposing to delete ten (10) sites from those currently listed on the State Priority List. Site investigation and necessary remedial activities have been completed at these sites to a point where the site no longer poses an unacceptable risk to human health or the environment from hazardous substances defined under the Arkansas Remedial Action Trust Fund Act, or that the site is currently being addressed on the National Priority List and included in a separate section of the regulation.

The sites proposed for delisting are listed below. Details on the sites' background history and the investigation and cleanup activities carried out are given in individual sites summaries at Tabs 1 through 10 of this Attachment.

The sites proposed for delisting are:

(1) **Arkansas Waste-to-Energy Incinerator Site**
(2) **Arkansas Waste-to-Energy E.R. Moore Site**
(3) **Butler Elementary School**
(4) **Garland County Industrial Park Landfill**
(5) **Leachville Metal Plating**
(6) **Mid-South Reclamation Industries**
(7) **Mountain Pine Pressure Treating**
(8) **Plainview Lumber Company**
(9) **Swift Chemical Company, Arkansas Street Site**
(10) **Vertac Chemical Company**

(c) **Sites Proposed for Addition to the State Priority List**

ADEQ is proposing to add the following six (6) sites to the State Priority List in order to address the threats or perceived threats to human health and the environment posed by hazardous substance releases and related contamination at each site:

(1) **Arkansas General Industries**
(2) **BEI Defense Systems**
(3) **Dana Minton Property**
(4) **Valspar**
(5) **Value-Line – 3rd Street Property**
(6) **Value-Line – 10th Street Property**

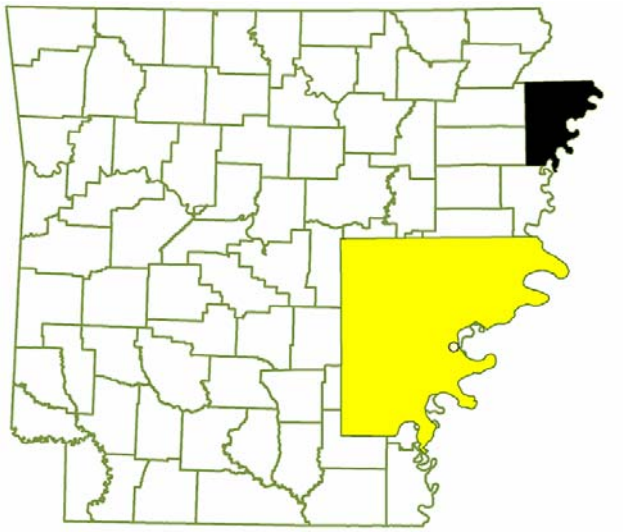
Detailed information on the background, history, potential threats, and proposed response actions for each site is detailed at Tabs 11 through 16 of this Attachment.

Similar summary documents for sites retained on the proposed State Priority List may be found on the Department's web site at http://www.adeq.state.ar.us .

ARKANSAS WASTE-TO-ENERGY E.R. MOORE SITE

STATE PRIORITY LIST SITE
OSCEOLA, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: Not Assigned
EPA CERCLA ID No: Not Assigned
AFIN: 47-00027
County: Mississippi
Arkansas Senate District: 15
Arkansas House District: 55
US Congressional District: 1

Current Status

The E.R. Moore site is a building associated with the Arkansas Municipal Waste-to-Energy (AMWE) operation that was subject to a series of emergency responses, removal actions, and cleanup operations beginning in 2003 and largely accomplished by 2005. The AMWE operation leased a municipal incinerator and the nearby Parsons Warehouse; medical and industrial wastes were improperly handled and stockpiled at both locations. The AMWE operation also leased the E.R. Moore building and used it to stockpile similar wastes.

The City of Osceola owns the E.R. Moore site, which has remained empty since the final removal and cleanup of medical and industrial wastes was completed in December 2003. The building remains boarded and all entrances locked; the north loading dock area is fenced. No additional investigations or actions are warranted or anticipated at this time.

State Priority List History

The Arkansas Remedial Action Trust Fund Act (A.C.A. 778-7-501 et seq.), or RATFA, provides authority and funding for identifying, investigating, and remediating hazardous substance sites throughout the State. The RATFA Hazardous Substances Site Priority List (SPL) identifies those hazardous substance sites eligible for State-funded investigation and remedial actions, if necessary, on a case-by-case basis; it is not an inclusive site inventory or historical list. All three AMWE facilities, including the E.R. Moore Building, were placed on the SPL in 2005 due to ongoing cleanup associated with the AMWE operation.

Site Description

Location: The E.R. Moore Building is located within the city limits of Osceola, Arkansas on the south side of town, one block south of the Parsons Warehouse. The geographic coordinates are 35^{o} 41' 34.85" north latitude and 89^{o} 58' 22.16" west longitude. Street address: 1025 Ohlendorf Road.

Population: Osceola has an estimated 9,175 residents.

Setting: The E.R. Moore Building is currently owned by the City of Osceola, and is situated in an area zoned as light industrial. The masonry block building of approximately 50,000-square feet in size on a concrete slab has loading docks located at opposite ends. The unoccupied building is subdivided into several separate areas including an office area and former production and shipping spaces. Land use within .25 miles of the site includes various commercial businesses, agricultural land, residences, a small apartment complex and a daycare center. A residential subdivision is within .5 mile to the north and east of the site.

Hydrology: The site is lies at an elevation of approximately 240 feet above mean sea level and the topographical slope is less than 1 percent. Drainage for the entire area is provided by a series of man-made drainage systems. A significant portion of the ground covering is a combination of concrete and asphalt; no surface water impoundments or other features are present. Stormwater runoff flows into the drainage ditches along the site; this drainage system eventually discharges into the Mississippi River approximately 1 mile to the east. The site is not located in the 100-year flood plain.

Aerial Photo: AMWE Facilities - Osceola, Arkansas

Waste and Volumes

In early- to mid-2001, the municipal incinerator experienced a significant fire resulting in extensive downtime and reconstruction. During this period, AMWE-contracted materials, including medical and industrial waste, were diverted from the incinerator to the unoccupied E.R. Moore Building. The former manufacturing facility served as a temporary warehouse and staging area for these wastes. Due to the condition of the building roof, a large volume of the waste had been exposed to the elements; furthermore, several of the waste containers had degraded and released their contents to the interior of the building.

When City of Osceola officials became aware of the substantial volume of waste being stockpiled at the E.R. Moore Building, they requested immediate removal to the incinerator for processing. A contractor was retained to oversee and document removal activities from October through November 2002. Debris, consisting largely of medical waste, and spills were cleaned up in and around the building, and vacuum trucks were used to siphon decontamination water from truck wells.

The AMWE ceased waste removal and processing, as well as operation of the incinerator, in early 2003. The City of Osceola assumed control of the building and secured it from unauthorized access through boarding up and padlocking the loading bays and doors.

Health Considerations

No further activity has occurred at the E.R. Moore Building since December 2003; however, the type of wastes that had been removed from the site appears to have been identical to those found at the municipal incinerator and the Parsons Warehouse. The EPA Region 6 sampled and classified approximately 4,000 drums at the Parsons Warehouse in 2004. Results of tests for biological hazards showed no elevated risks for persons on or off site following proper containerization, cleanup of spills and uncontrolled medical wastes, and securing all materials within the warehouse. These actions eliminated the threat or potential threat of release of hazardous substances, pollutants, or contaminants at the Parsons site. The ADEQ prepared a Preliminary Assessment (PA) Report for the municipal incinerator in July 2007. Based on the finding the incinerator site does not pose a threat to human health and/or the environment, the PA recommended no further action under the Comprehensive Environmental Response, Compensation, and Liability Act. Given the similarity of waste associated with the other two AMWE facilities to the waste stored in the E.R. Building, the health determinations made for those facilities would be applicable to the E.R. Moore Building.

ADEQ Response Actions

The following chronology lists milestones and provides brief activity descriptions:

- Complaint Investigation, March 2003 – Site inspection in response to complaint that AMWE was receiving flammable materials for incineration and using a nearby warehouse for storage. Estimated 20,000 waste containers in storage in the Parson's warehouse.
- Waste Sampling and Profiling, March and April 2003 – Sampled containers and began waste categorization/segregation.

- Facilities and PRP Search, June 2003 – EPA Region 6 Criminal Investigation Division executed search warrant for all AMWE facilities; ADEQ began PRP search and contact, made arrangements for PRPs within State of Arkansas to remove their waste and dispose properly. ADEQ and ADH continued contacting PRPs and arranging additional removals.

ADEQ Anticipated Future Activities

The eventual status of the E.R. Moore Building was undetermined when it was placed on the SPL in 2005; however, the City of Osceola, in close cooperation with the ADH and EPA Region 6, assumed responsibility for completing the removal and cleanup operations and no additional assistance from ADEQ is anticipated. This site no longer presents a threat to either human health or the environment and the ADEQ Hazardous Waste Division will recommend its removal from the RATFA SPL at the next rulemaking.

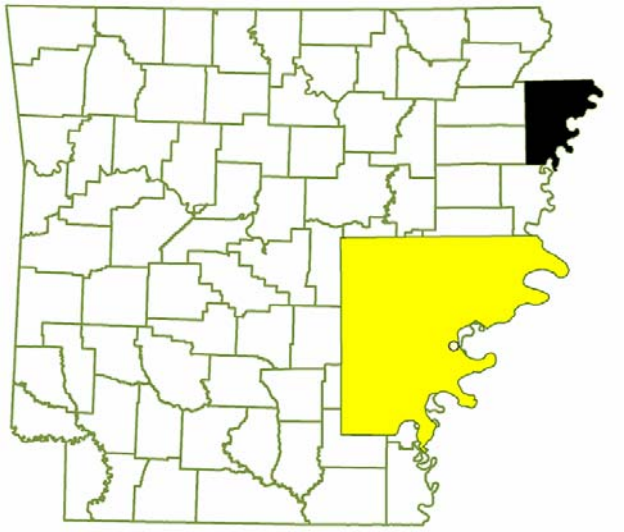
Site Contacts

Project Coordinator: Mary Pearson (501) 682-0858

ARKANSAS WASTE-TO-ENERGY INCINERATOR SITE

STATE PRIORITY LIST SITE
OSCEOLA, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: ARR000011684
EPA CERCLA ID No: ARN000606748
AFIN: 47-00509
County: Mississippi
Arkansas Senate District: 15
Arkansas House District: 55
US Congressional District: 1

Current Status

Uncontrolled medical, municipal, and non-hazardous industrial wastes were identified and subsequently removed from the Arkansas Waste-to-Energy Incinerator site, commonly known as the Osceola Incinerator, in 2003. All cleanup and disposal activities were finished by early 2004. ADEQ submitted a Preliminary Assessment (PA) Report for the Osceola Incinerator to EPA Region 6 in July 2007. The PA Report made a recommendation of No Further Action Planned (NFRAP) for this site. EPA Region 6 is reviewing the PA Report and will prepare a Superfund Site Strategy Recommendation Form to provide public notification of their decision.

State Priority List History

The Arkansas Remedial Action Trust Fund Act (A.C.A. 778-7-501 et seq.), or RATFA, provides authority and funding for identifying, investigating, and remediating hazardous substance sites throughout the State. The RATFA Hazardous Substances Site Priority List (SPL) identifies those hazardous substance sites eligible for State-funded investigation and remedial actions, if necessary, on a case-by-case basis; it is not an inclusive site inventory or historical list.

The Osceola Incinerator was one of three sites where medical, municipal, and industrial wastes had been improperly stored by the former owner of the Arkansas Municipal Waste-to-Energy (AMWE) operation. The AMWE leased the incinerator facility and surrounding property from the City of Osceola, and was also using two nearby warehouses to improperly store wastes intended to be burned at the incinerator complex. All three AMWE facilities, including the Osceola Incinerator, were placed on the SPL in 2005 due to ongoing cleanup activities associated with the AMWE operation.

Site Description

Location: The 1.5-acre property is situated on the southeast edge of City of Osceola, Mississippi County, Arkansas. The geographic coordinates are 35^{o} 41' 24.16" north latitude and 89^{o} 58' 05.77" west longitude. Street address: 100 Incinerator Road.

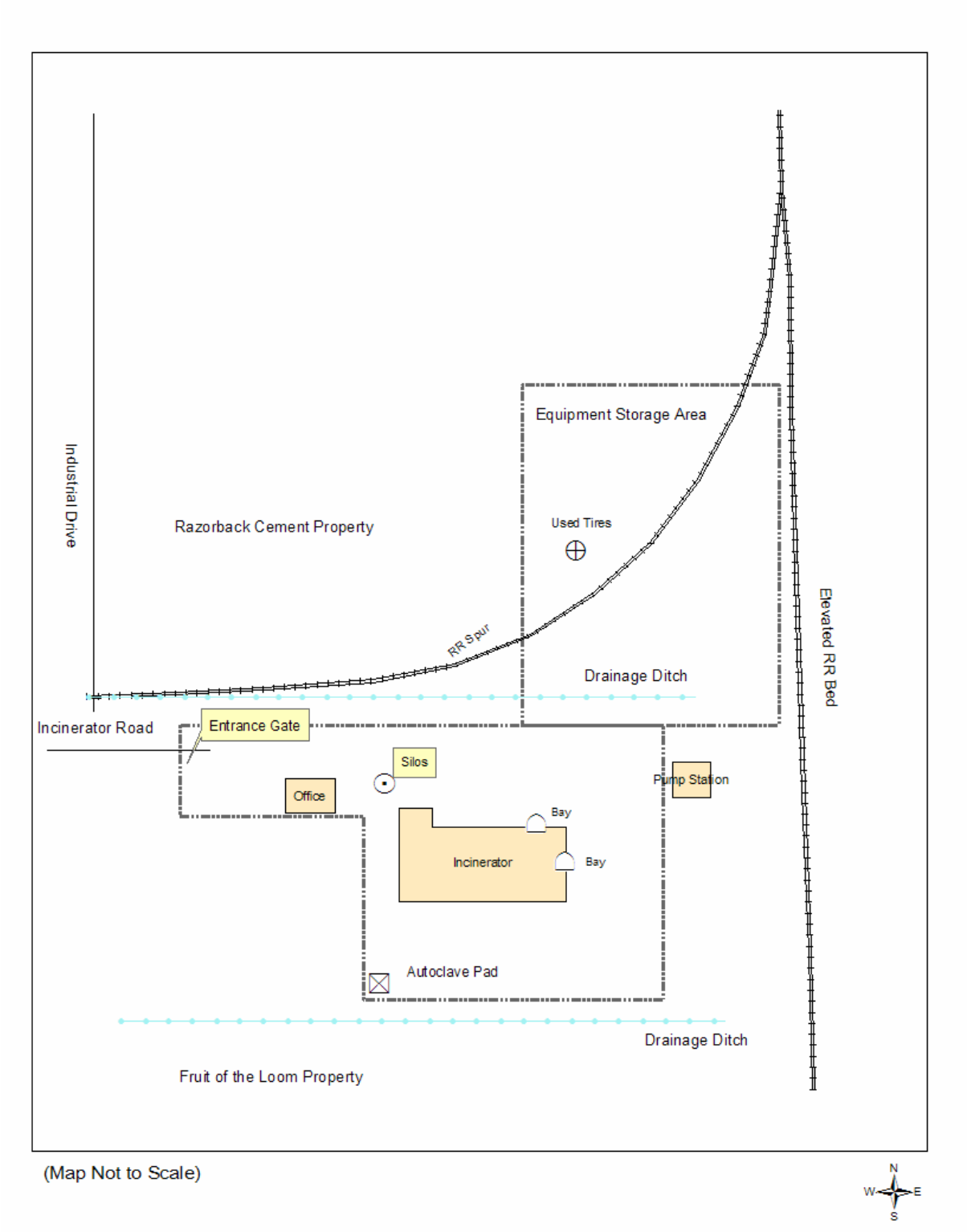
Population: Osceola has an estimated 9,175 residents.

Setting: The Osceola Incinerator site is owned by the City of Osceola and is situated in an area zoned as light industrial. The incinerator facility itself has been inoperable since 2002 and the site is currently used as a municipal waste transfer facility. Land use within .25 miles of the site includes various commercial businesses, agricultural land, residences, a small apartment complex and a daycare center. A residential subdivision is within .5 mile to the north and east of the site.

Hydrology: The site lies at an elevation of approximately 240 feet above mean sea level and the topographical slope is less than 1 percent. Drainage for the entire area is provided by a series of man-made drainage systems. Three grated stormwater drains are located in the road access/truck parking area north of the main building, and the paving is a combination of gravel, eroding asphalt, and patches of compacted soil. Stormwater runoff flows into the drainage ditches along the site; this drainage system eventually discharges into the Mississippi River approximately 1 mile to the east. The site is not located within the 100-year or 500-year flood plain.

Aerial Photo: Incinerator Site One-Mile Radius, Osceola, Arkansas

Site Diagram: Incinerator Site and Surrounding Property



Site Photo: Osceola Incinerator Site – March 2003

Site Photo: Osceola Incinerator Site – June 2007

Waste and Volumes

February 2003 citizen complaints about AMWE waste management practices at both the Osceola Incinerator and the two associated warehouses instigated a series of investigations and activities by ADEQ, ADH, EPA Region 6, and City of Osceola representatives. The most significant threats to human health and the environment were presented by the warehouse contents and conditions.

After the initial site visits and investigations, City of Osceola representatives and the Arkansas Department of Health (ADH) assumed responsibility for the cleanup of the Osceola Incinerator site. Although the property served as a staging facility for containerized wastes during characterization and cleanup/disposal activities at the warehouses; the removal and cleanup efforts for the Osceola Incinerator site involved primarily medical and municipal waste. The total waste volumes removed from the site were estimated to be several tons.

Health Considerations

The PA evaluated risks to human health and the environment. The 2007 field investigations and record reviews indicated no evidence of hazardous waste, pollutant, or contaminant sources at the site, and confirmed that the cleanup activities had successfully mitigated potential health risks. Additionally, the ADH prepared a Health Consultation Report in 2005 for the AMWE facilities. The Report concluded that present and future exposure pathways for air, soil, water, and biota pose no apparent health hazard.

ADEQ Response Actions

The following chronology lists milestones and provides brief activity descriptions:

- Complaint Investigation, March 2003 – Site inspection in response to complaint that AMWE was receiving flammable materials for incineration and using a nearby warehouse for storage. Estimated 20,000 waste containers in storage in the warehouse.
- Waste Sampling and Profiling, March and April 2003 – Sampled containers and began waste categorization/segregation.
- Facilities and PRP Search, June 2003 – EPA Region 6 Criminal Investigation Division executed search warrant for all AMWE facilities; ADEQ began PRP search and contact, arranging for PRPs within State of Arkansas to remove their waste and dispose properly. ADEQ and ADH continued contacting PRPs and arranging additional removals.
- Assistance Request, June 2004 – ADEQ requested the assistance of the EPA Region 6 Emergency Response Branch due to volume of substances remaining at the AMWE facilities, the poor condition of both containers and warehouses, and proximity of a daycare facility.
- PA Investigation and Report, February through July 2007 – Conducted site visits, record and document reviews, interviews, and report preparation to recommend NFRAP.

ADEQ Anticipated Future Activities

The status of the removal and cleanup operations conducted by City of Osceola representatives and the ADH at the Osceola Incinerator site was undetermined when the site was placed on the SPL in 2005. The PA prepared in 2007, however, determined that this site no longer presents a threat to either human health or the environment and the ADEQ Hazardous Waste Division recommends its removal from the RATFA SPL at the next rulemaking.

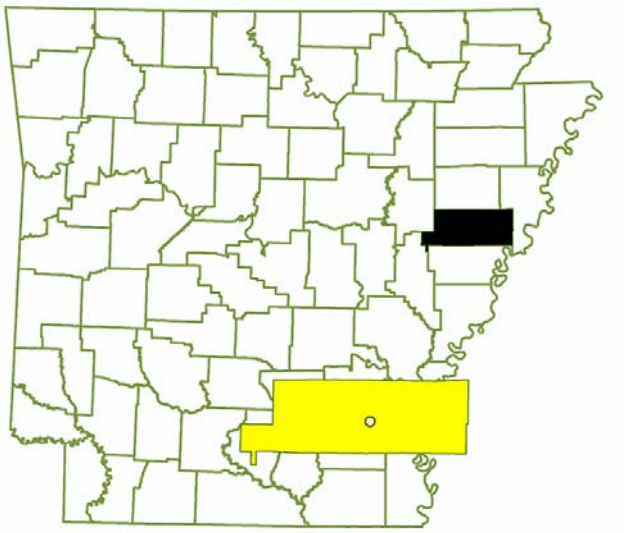
Site Contacts

Project Coordinator:	Mary Pearson	(501) 682-0858

BUTLER ELEMENTARY SCHOOL BROWNFIELDS

STATE PRIORITY LIST SITE MADISON, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: Not Assigned
EPA CERCLA ID No: Not Assigned
AFIN: 62-00210
County: St. Francis County
Arkansas Senate District: 16
Arkansas House District: 52
US Congressional District: 1

Current Status

The Butler Elementary School property is being assessed under the Arkansas Voluntary Clean-Up Act (Brownfields Program) (Act 1042 of 1997, as amended, Arkansas Code Annotated (A.C.A. 8-7-1101 et seq.). Under this program and amendments, underutilized or abandoned industrial, commercial, or agricultural sites are evaluated through the Comprehensive Site Assessment (CSA) process to determine the nature and extent of hazardous substances released to the environment, potential for additional releases, and the risk to human health and the environment.

This site was donated to the City of Madison in the 1950s for use as a school. Abandoned for several years, the building fell into a state of disrepair. The Madison Community Improvement Association (CIA) issued a Letter of Intent in February 2005 indicating their desire to enter into an agreement with the ADEQ for redevelopment of the site under the Arkansas Brownfields Program.

The CSA Report for this site was approved in January 2007. A Public Notice of the Implementing Agreement (IA) entered by and between the Madison CIA and the ADEQ for the purpose of compliance with appropriate Arkansas Statutes governing the voluntary cleanup of the Butler property

became effective in May 2007. The ADEQ approved the Property Development Plan (PDP) submitted by the Madison CIA in September 2007. The PDP proposed the redevelopment of the site into a multi-purpose center for community-based programs, including a park, after school programs, senior citizen day care, Head Start, and other services. The ADEQ issued the final Property Development Decision Document (PDDD) on April 2, 2008.

State Priority List History

The Arkansas Remedial Action Trust Fund Act (A.C.A. 778-7-501 et seq.), or RATFA, provides authority and funding for identifying, investigating, and remediating hazardous substance sites throughout the State. The RATFA Hazardous Substances Site Priority List (SPL) identifies those hazardous substance sites eligible for State-funded investigation and remedial actions, if necessary, on a case-by-case basis; it is not an inclusive site inventory or historical list. The Butler Elementary School site was added to the Investigative category of the SPL in 2005 in order to identify the nature and extent of health and other risks associated with suspected heavy metal and asbestos contamination, as well as the possible presence of unknown contaminants.

Site Description

Location: The site, comprising more than 2.5 acres, is located at the southeastern corner of the intersection of 5th Street and School Drive in the southern portion of the City of Madison, Arkansas. The geographic coordinates are 35^{o} 00' 39" north latitude and 90^{o} 43' 33" west longitude.

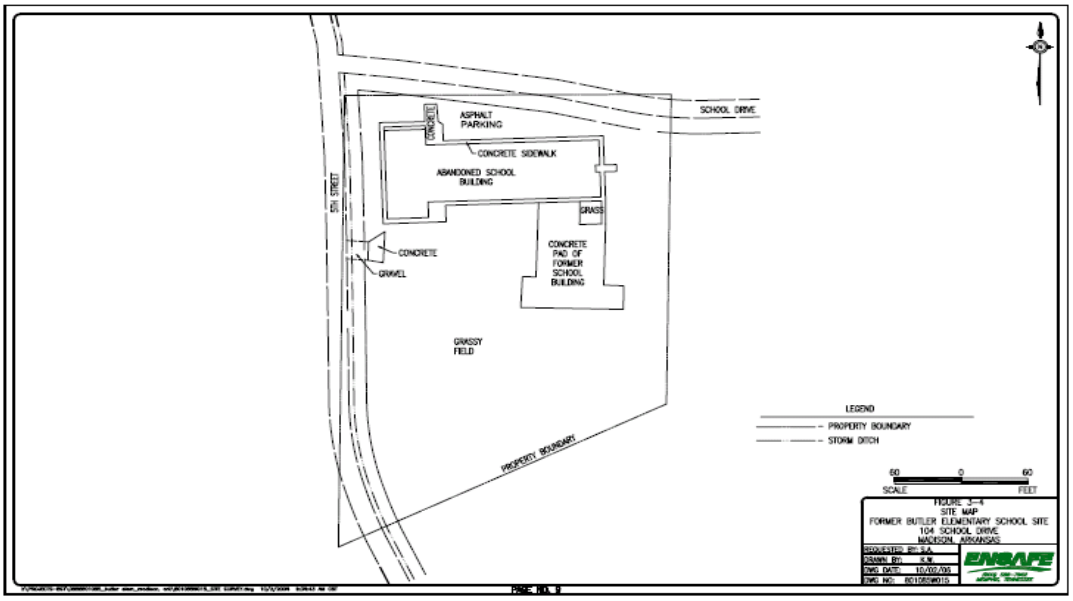
Population: Madison has approximately 987 residents.

Setting: An abandoned, 12,411-square-foot school building and a concrete foundation of a historical school building are situated on the property. The site is bordered on the south and southeast by open land with single- and multiple-family residences to the east and west. A church is adjacent to the north of the property and senior citizen apartments are located northwest of the site. Madison is primarily residential, having fewer than 10 commercial or retail businesses.

Hydrology: A stormwater conveyance/roadside drainage ditch runs southward along the western property boundary (parallel to 5th Street). This conveyance receives a majority of the surface runoff from the site. It continues offsite, south of the property, where it empties into another conveyance. According to the USGS 7.5-minute quadrangle map, no tributaries to navigable waters exist on or in the immediate vicinity of the subject property. The St. Francis River, a navigable water, lies within approximately .5 miles east of the property; and Crow Creek, a tributary to the St. Francis River, lies approximately 1 mile south of the site. The site is not in a special flood hazard area.

Aerial Photo: Madison, Arkansas

Site Diagram: Butler Elementary School



Waste and Volumes

Asbestos and lead-based paint have been identified in various building materials. Approximately 12,000 square feet of floor tile and mastic and 12,411 square feet of ceiling surfacing material contains greater than one percent asbestos. Of 387 measurements taken of painted surfaces, 44 indicated lead content at or above the Department of Housing and Urban Development (HUD)'s regulated level of 1.0 mg/cm^2. Additionally, lead concentrations in dust wipe samples of the floors exceeded HUD's standard of 40 ug/ft^2.

Health Considerations

The inhalation of asbestos fibers poses potential human health risks; and releases of lead presents a threat to both human health and the environment. To mitigate these risks, all waste building materials and lead-containing dust in the building will be abated by certified abatement firm(s). Depending on the type and extent of renovation activities, asbestos- and lead-containing materials will require: the development of written manage-in-place procedures; removal; or a combination of both. Future users of the building will be required to follow all manage-in-place procedures regarding these materials. The PDDD provides detailed information regarding risk mitigation measures during redevelopment activities.

ADEQ Response Actions

Funding awards granted by the EPA allow ADEQ the opportunity to offer technical assistance for site assessments to qualified Brownfields Program participants belonging to either the non-profit or public sector. As a non-profit organization, the Madison CIA was eligible for such assistance and ADEQ began a Targeted Brownfields Assessment (TBA) for the Butler Elementary School site in 2005. TBAs are designed to help minimize the uncertainties of contamination often associated with brownfields. ADEQ arranged for a contractor to prepare a Phase I Environmental Site Assessment, which included a background and historical investigation and preliminary site inspection, in April 2005. Upon Phase I completion, ADEQ secured a contractor to conduct the CSA activities of 2006 and 2007. ADEQ has provided contractor oversight, reviewed plans and reports, and continues to assist the Madison CIA in expediting the redevelopment process.

ADEQ Anticipated Future Activities

Within 45 days after completing remediation, the Madison CIA will submit a closure/final report for ADEQ review. A final inspection will be made by ADEQ to insure the PDDD has been followed and remediation is complete. The ADEQ then anticipates issuing a Certificate of Completion for the Butler Elementary School site.

This site does not present a threat to either human health or the environment and the ADEQ Hazardous Waste Division will recommend its removal from the RATFA SPL at the next rulemaking.

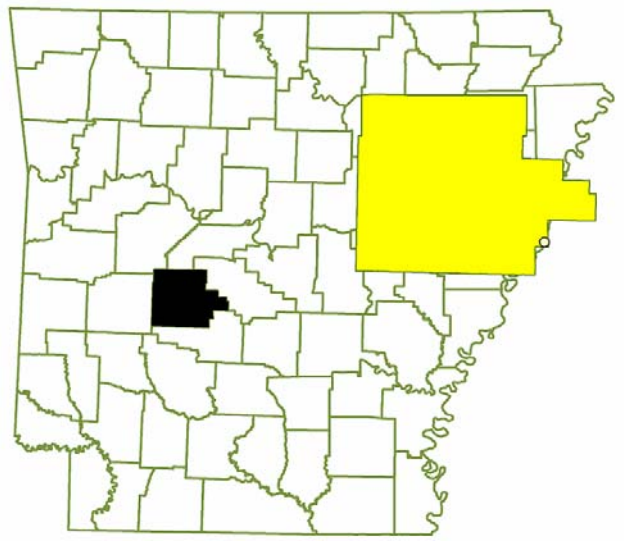
Site Contacts

Brownfields Coordinator:	Tamara Almand	(501) 682-0867
Project Coordinator:	Mary Pearson	(501) 682-0858

GARLAND COUNTY INDUSTRIAL PARK LANDFILL

STATE PRIORITY LIST SITE
HOT SPRINGS, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: ARD980748594
EPA CERCLA ID No: N/A
AFIN No: 26-00149
County: Garland
Arkansas Senate District: 19
Arkansas House District: 25
US Congressional District: 4

Current Status

This site is currently idle. Vegetation has been established, but sparse areas have been noted. There has been no response action conducted since the county covered portions of exposed waste in the early 1990s.

State Priority List History

The site was listed in the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 30 (Arkansas Remedial Action Trust Fund Hazardous Substance Site Priority List) under the remediation category. The County covered areas of exposed waste in the early 1990s.

Site Description

Location: The site is located off of Industrial Park Drive along the south side of Highway 270 in Garland County Industrial Park a few miles east of Hot Springs, Arkansas (34.459722 north latitude, 92.92444 west longitude)..

Population: The landfill site is near Lake Catherine. Several lake side residents are located within a mile radius of the site and the industrial park. Hot Springs has a population of about 36,000.

Setting: The inactive landfill site is about 26 acres. The landfill borders the industrial park properties on all sides except along the east side where is borders Greenbay Drive.

Hydrology: The site is somewhat hilly with several feet of elevation change from the actual landfilled area to the natural drainage ravines which take the surface water runoff to the nearby lake. The drainage ravines are generally north/south oriented with a significant drainage feature along the west side of the landfill area. Intermediate drainage features within the landfill area are generally east/west trending.;

Aerial Photo:

Waste and Volumes

The property existed as the local landfill for the industrial park for several years. Records indicate that the landfill received all types of industrial waste and also some small amount of municipal waste from the industrial park businesses. The County operated the landfill during its history. Depth of waste varies from a few feet to several tens (10's) of feet.

Contaminants of concern were basically identified as polychlorinated biphenyl (PCB) waste and metal laded leachate.

The County covered portions of exposed waste in the early 1990s. Several years ago an adjacent industrial park business did some excavation and removed some PCB waste.

Health Considerations

None

Once the County covered the exposed waste the leachate problem was corrected.

ADEQ Response Decision

ADEQ posted some signs around the perimeter of the landfill to deter trespassers and worked with the County to encourage them to cover the exposed waste.

ADEQ Anticipated Future Activities

None

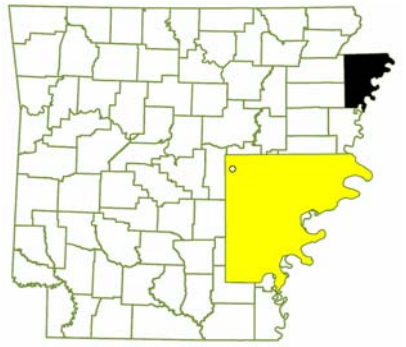
Site Contacts

Project Coordinator:	Clark McWilliams	(501) 682-0850 clarkm@adeq.state.ar.us
Information Repository:	Garland County Library 1427 Malvern Avenue Hot Springs, AR 71901	(501) 623-4161

LEACHVILLE METAL PLATING

STATE PRIORITY LIST SITE
LEACHVILLE, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: Not Assigned
EPA CERCLA ID No: AR0000012955
AFIN: 47-00272
County: Mississippi
Arkansas Senate District: 15
Arkansas House District: 77
US Congressional District: 01

Current Status

The Leachville Metal Plating site is an abandoned school building once used as an illegal dumping area for wastes generated by Withgo Metal Finishing, Inc. (Withgo). Upon inspection of the facility in February 1994, ADEQ determined that the presence of drums containing cyanide, heavy metals, acids, bases, and other incompatible wastes stored in close proximity should be handled under the EPA Region 6 Removal Program. The EPA Region 6 conducted an emergency action at the site in September 1994 to stabilize and segregate hazardous material and waste. The site was secured and fenced to prevent trespassing, and continued to be used for storage until final disposal was funded and accomplished in March 1999. The property has been cleaned up and is currently used for furniture storage; no further environmental actions are warranted or anticipated.

State Priority List History

The Arkansas Remedial Action Trust Fund Act (A.C.A. 778-7-501 et seq.), or RATFA, provides authority and funding for identifying, investigating, and remediating hazardous substance sites throughout the State. The RATFA Hazardous Substances Site Priority List (SPL) identifies those hazardous substance sites eligible for State-funded investigation and remedial actions, if necessary, on a case-by-case basis; it is not an inclusive site inventory or historical list. Leachville Metal Plating was placed on the SPL in February 2000 due to the indeterminate final status of the site at that time.

Site Description

Location: The Leachville Metal Plating site is located adjacent to 4th Street between Nelson Street and Lange Street within the city limits of Leachville, Arkansas. The geographic coordinates are 35° 56' 04" north latitude and 90° 15' 20" west longitude.

Population: The City of Leachville has about 1,981 residents.

Setting: The property is situated on approximately half an acre land within a residential area. The site is located 25 feet from the nearest residence; an estimated 61 people are housed and a daycare center is in operation within 200 feet of the site.

Hydrology: The northwestern part of Mississippi County, in which the site is located, is drained primarily by Buffalo Creek Ditch and the Right and Left Hand Chutes of Little River. The total population in Mississippi County depends exclusively upon ground water to meet their drinking needs. Overland drainage from the site flows into West Branch Buffalo Creek Ditch; thence the St. Francis River; thence the Mississippi River. The site lies within an area of minimal flood hazards.

Aerial Photo: Leachville Metal Plating, Leachville, Arkansas (2006).

Waste and Volumes

The types of hazardous waste and approximate volumes removed from the Leachville Metal Plating site included: 165 gallons of phosphorus acid; 1,010 gallons of liquid chromium; 340 gallons of solid chromium; 650 gallons of liquid chromic acid and solution; 480 gallons of solid chromic acid; 1,020 gallons of borax; 525 gallons of methyl ethyl ketone (MEK) and/or MEK mixed with ethanol and/or chloroform; 255 gallons of ethanol mixed with acetone; 85 gallons of sulfuric acid; and 55 gallons of sulfanic acid.

Health Considerations

Health considerations included the potential for direct contact with significant quantities of hazardous materials and wastes, as well as the risk of fire and/or explosion. The drums were in poor condition and many were leaking. The building, which was easily accessible through broken windows, had been vandalized. The possibility of unauthorized individuals entering the site and coming into contact with

the wastes and unknown compounds was of great concern, as was fire and/or explosion hazard posed by potential mixing of incompatible wastes. Given the close proximity of residents and the daycare facility, it was imperative that the site be secured and the hazardous materials and wastes stabilized and segregated. The EPA Region 6 Emergency Response Branch (ERB) ensured that this was accomplished by September 1994.

ADEQ Response Actions

ADEQ inspectors discovered the site in August 1992 while investigating the location of hazardous metal plating wastes from the defunct Withgo operation. The site owner was contacted and held responsible for removal and proper disposal of the hazardous materials and wastes. A follow up inspection by ADEQ in February 1994 revealed leaking containers of incompatible wastes inside the building; approximately 210 containers of metal plating waste were documented. ADEQ contacted the EPA Region 6 ERB, which sent a Technical Assistance Team to evaluate the site in August 1994. By September 1994, the site had been rendered inaccessible to the public.

ADEQ inspectors visited the site in June 1995 to assess the integrity of security measures implemented by the emergency response actions, check the containerized hazardous waste stored at the facility, and note overall site conditions. The facility had been enclosed with a 6-foot high chain link fence topped with barbed wire, and all building windows covered with corrugated tin sheeting.

ADEQ representatives met the EPA Region 6 ERB removal team onsite on March 9, 1999. The site was prepared for additional sampling, removal, and disposal activities. All operations and subsequent site demobilization was completed by April 1999. An ADEQ representative visited the site on June 13, 2008 to verify waste removal and ascertain current site conditions. The building is secure and presently used for retail furniture storage.

ADEQ Anticipated Future Activities

The eventual status of the Leachville Metal Plating site was undetermined when it was placed on the SPL in 2000; however, the EPA Region 6 has completed a Superfund Site Strategy Recommendation form with a conclusion of No Further Remedial Action Planned. No additional assistance from ADEQ is anticipated. This site no longer presents a threat to either human health or the environment and the ADEQ Hazardous Waste Division will recommend its removal from the RATFA SPL at the next rulemaking.

Site Contacts

Contact: Mary Pearson (501) 682-0858

MID-SOUTH RECLAMATION INDUSTRIES

STATE PRIORITY LIST SITE SMACKOVER, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118

EPA RCRA ID No: N/A
EPA CERCLA ID No: N/A
AFIN: 70-00446
County: Union
Arkansas Senate District: 25
Arkansas House District: 7
US Congressional District: 4

Current Status

In 2003, the Arkansas Department of Environmental Quality -Solid Waste Management Division (ADEQ) wrote a letter to Mid-South Reclamation Industries stating that all the activities the ADEQ deemed necessary to properly mitigate potential hazardous conditions at the site have been completed.

State Priority List History

The Arkansas Department of Environmental Quality (ADEQ) conducted a site investigation at the Mid-South facility in April, 2001 to determine continuing risks posed by the conditions on the site. Toxic metals and cyanide compounds were detected in surface soil and sediment samples during the April

2001 investigation, as well as elevated levels of arsenic, barium, cadmium, chromium, cobalt, copper, iron, lead, manganese, nickel, sodium, thallium, zinc, and cyanide at approximately three times background levels.

As of January 2, 2002, little or no clean-up had been accomplished since the 1998 fires were extinguished. Access to the site was uncontrolled. Approximately 36,000 cubic yards of shredded tire and rubber material and nearly 8,000 intact tires remaining at the site continued to pose an imminent risk for another tire fire. Such a fire would endanger human health and the environment by releasing hazardous substances from the tire residues to the soil and surface waters as well as emitting air pollutants from the burning tire material.

Preliminary costs for cleaning up the site were estimated at approximately $1.03 million, which greatly exceeds the amount of financial assurance posted by Mid-South. The ADEQ placed the site on the State Priority List of the Arkansas Remedial Action Trust Fund Act (RATFA) in order to address site cleanup.

Provisions of RATFA (Arkansas Code, Annotated, § 8-7-5 and APC&EC Regulation No. 23, § 26(b)) require that before any moneys from the Remedial Action Trust Fund are expended on a hazardous substance site, that site must be listed on the State Priority List in Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 30. The Mid-South Reclamation Industries facility was added to the State Priority List in May 2002 in order to fund a timely response to the hazard posed by conditions at the site.

Site Description

Location: Mid-South Reclamation is located at 2 Kenova Road in Smackover, Arkansas.

Population: The population of Smackover, Arkansas is 1, 929.

Setting: Mid-South Reclamation Industries, Inc. (hereinafter "Mid-South") is an inactive tire reclamation facility located at 2 Kenova Road in Smackover, Union County, Arkansas. Waste tires were brought to the site and stored until they could be de-beaded and shredded. The shredded tires were then sold for fuel, or reduced further and sold as rubber turf. The facility is privately owned by Drew Sheppard and Courtney Sheppard via a parent company, Sheppard Land and Timber Company. Sheppard Land and Timber owns 85% of Mid-South stock. The company is currently in bankruptcy.

Hydrology: The terrain in the Smackover area is gently rolling. Most of the flat-lying land surface is located on the flood plains of the larger streams like Smackover Creek. The area is underlain by a great thickness of relatively young and unconsolidated sedimentary rocks. The main rock formation present in the Smackover area is alluvium and terrace deposits of Quaternary age. The terrace deposits are composed of unconsolidated gravel and sand with clay in the upper portion. This is overlain by recent alluvium, clay silt and sand, in the floodplains of the streams. The Quaternary deposits range considerably in thickness but the maximum is probably less than 100 feet.

Site Photos: Current conditions of the Site (October 2007)

Waste and Volumes

The facility experienced a fire in 1992 and another in 1998. Little or no clean-up was accomplished between the time the 1998 fires was extinguished and January 2002. Access to the site was uncontrolled. Approximately 36,000 cubic yards of shredded tire and rubber material and nearly 8,000 intact tires remaining at the site continue to pose an imminent risk for another tire fire. Such a fire would endanger human health and the environment by releasing hazardous substances from the tire residues to the soil and surface waters as well as emitting air pollutants from the burning tire material.

Health Considerations

Toxic metals and cyanide compounds were detected in surface soil and sediment samples during the April 2001 investigation, as well as elevated levels of arsenic, barium, cadmium, chromium, cobalt, copper, iron, lead, manganese, nickel, sodium, thallium, zinc, and cyanide at approximately three times background levels.

ADEQ Response Actions

In April 1992, Mid-South experienced a fire in an unpermitted storage area used for tires and shredded rubber. This fire burned for several weeks before going out. A subsequent ADEQ Solid Waste Division inspection revealed that Mid-South was operating without the necessary permits for the burning storage area. ADEQ staff then began work to attempt to bring the facility into compliance.

ADEQ conducted routine compliance inspections at Mid-South beginning in June 1992. Mid-South operated in continuing noncompliance with the requirements of APC&EC Regulation No. 22 (Solid Waste Management) throughout the operating history of the facility, from approximately 1992 until the facility ceased active operations in 1998. The company submitted a Corrective Action Plan to ADEQ in October 1997, with a suspense of April 30, 1998 to complete the actions called for in the plan.

On April 30, 1998, Mid-South experienced another fire in its permitted unit. This fire spread to the unpermitted area on May 1, 1998. The Smackover and Norphlet fire departments responded to these fires, but Mid-South was unable to pay the costs of extinguishing the fires. ADEQ officials were notified and retained personnel and equipment to extinguish the fire, however ADEQ soon exhausted its budget for the response and it was decided to let the fires burn themselves out.

ADEQ took enforcement action against Mid-South by issuing a Notice of Violation (NOV) on May 14, 1998. This NOV found reasonable grounds that Mid-South had violated the provisions of APC&EC Regulation No. 22, and sought civil penalties in the amount of $150,200. Mid-South began negotiations with ADEQ to resolve this NOV.

On July 14, 1998, the U.S. Environmental Protection Agency (U.S. EPA) Region VI was notified by concerned citizens in the Smackover area that the April fire at the Mid-South site was still burning. EPA tasked its Superfund Technical Assistance and Response Team to conduct an emergency response to extinguish the fires. The Mid-South site was added to EPA's CERCLIS list on July 16, 1998 and

emergency removal activities were initiated in order to extinguish the smoldering fire. All emergency response activities at the site were completed by July 24, 1998.

ADEQ and Mid-South entered into a Consent Administrative Order (CAO), LIS No. 98-066 as a compromise to resolve the issues charged in the May 1998 NOV. Mid-South agreed to cease receipt and storage of tires at their facility, to submit a corrective action plan to ADEQ for approval within 60 days, and to clean up the site within 120 days of approval of the corrective action plan. Mid-South also agreed to pay a civil penalty of $25,000, clean up the site within 90 days, and sell the property with the proceeds of the sale to be used to implement a Supplemental Environmental Project designed to advance environmental interests.

Failure to comply with the corrective action plan would cause Mid-South to forfeit a letter of credit issued by the First National Bank of El Dorado, Arkansas, in the amount of $100,000 at which time ADEQ would apply these funds for cost recovery of remediation at the facility. Mid-South signed the corrective action plan on or about October 28, 1998, with an effective date of December 12, 1999.

Mid-South defaulted on the conditions of the CAO, and on April 1, 1999, ADEQ filed suit in civil court to compel Mid-South to comply with the conditions of the order. In May 2002, ADEQ listed Mid-South on the State Priority List to aid in timely response actions. Mid-South completed remedial activities abating the potential harm that warranted listing of the site on the SPL.

ADEQ Anticipated Future Activities

On September 18, 2003 the Solid Waste Management Division wrote a letter to Mid-South Reclamation Industries stating that all the activities the Agency deemed necessary to properly mitigate potential hazardous conditions at the site had been completed.

Site Contacts

Project Coordinator:	Bryan Leamons	501-682-0601 leamons@adeq.state.ar.us
Information Repository:	None Officially Required	

MOUNTAIN PINE PRESSURE TREATING SUPERFUND SITE

STATE PRIORITY LIST SITE
PLAINVIEW, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118

EPA RCRA ID No: ARD049658628
EPA CERCLA ID No: ARD049658628
AFIN: 75-00008
County: Yell
Arkansas Senate District: 4
Arkansas House District: 61
US Congressional District: 2

Current Status

Remedial activities at the Mountain Pine Pressure Treating (MPPT) Site, a subsidiary of the Plainview Lumber Company (PLC), which included immobilization and capping of the onsite contamination, were completed in September 2005. Water from the former Recovery Holding Pond (RHP), Spray Evaporation Pond (SEP), and the "new" chromated copper arsenate treatment plant (CCATP) was pumped to an onsite water treatments system using a sand filter, sodium hypochlorite, granular activated carbon, and alumina. Contaminated soil and sludge in the former RHP and sediment in the SEP were excavated, immobilized using solidification/stabilization by mixing with cement, calcium oxide, ferrous sulfate, and granular activated carbon, and then replaced in the excavated areas. Both the RHP and SEP were capped with soil and seeded to establish vegetation to prevent erosion. Currently, the groundwater is being monitored semi-annually to evaluate the effectiveness of the remedial activities.

In 2000, the USEPA selected the MPPT Site as one of 40 new pilots in the second round of the Superfund Redevelopment Initiative (SRI) Program. The City of Plainview received $100,000 grant in financial aid for the reuse assessment and public outreach in 2000 from the USEPA.

In 2001, the City of Plainview received a $50,000 Superfund Technical Assistance Grant (TAG grant) from the USEPA.

In 2003, the Economic Development Administration (EDA) of the U.S. Department of Commerce provided $763,000 and the Arkansas Department of Economic Development (ADED) provided $334,620 to the City of Plainview for reuse/redevelopment of the MPPT Site. The Prospect Steel Company is currently operating in the PLC portion of the MPPT Site.

In 2005, the MPPT received the Phoenix Award for Community Impact and was recognized at the Brownfields Conference in Denver, Colorado. The MPPT Site is the first SRI Site and the first Phoenix Award recipient in Arkansas. The City of Plainview is currently pursuing obtaining new and additional tenants for other portions of the MPPT Site.

State Priority List History

Prior to the initial closure of the MPPT and PLC facility in 1986, site conditions posed an imminent threat to human health and the environment due to uncontrolled releases of pentachlorophenol (PCP) and chromated-copper-arsenate (CCA). To help mitigate the releases of PCP and CCA which were causing an imminent threat to human health and the environment, the MPPT facility was placed on the State Priority List as part of the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 30.

Site Description

Location: The MPPT Site is located on the southwestern edge of Plainview, Yell County, Arkansas (34°59'00" north latitude and 93°18'12" west longitude). The MPPT Site is located in the northern portion of a 95 acre tract of property which encompasses 45 acres of timberland and 50 acres of grassland. The property is bordered on the north by Arkansas State Highway 28; on the east by Plainview, Arkansas; on the south by grass and woodlands; and on the west by Sunlight Bay Road.

Population: Plainview = 685, Yell County = 17,601.

Setting: The MPPT Site consists of three contiguous abandoned facilities: (1) the Plainview Lumber Company (PLC) in the northern area of the site; (2) the Mountain Pine Pressure Treating MPPT) pentachlorophenol (PCP) and chromated-copper-arsenate (CCA) plants in the central area of the site; and (3) the "new" CCA Treatment Plant (CCATP) in the eastern area of the site. The PLC operated as a business involving the sale of raw and treated lumber from 1965 to 1986. The MPPT plants, a subsidiary of PLC, operated as a wood treating facility from 1965 to 1986. The CCATP operated as a wood treating facility from 1980 to 1986, and reopened briefly in 1989 but operational conflicts brought about closure.

Hydrology: Topography at the site is relatively flat with gentle east to west slopes. Surface water drains toward the western and eastern edges of the site, toward the perennial Porter Creek and Prairie Creek, respectively, which both eventually enter Nimrod Lake less than a mile south of the site. Nimrod Lake is the sole source of drinking water for the City of Plainview, and it also serves as a recreational and commercial fishing area. The site is not located in the 100-year flood plain.

Site Diagram:

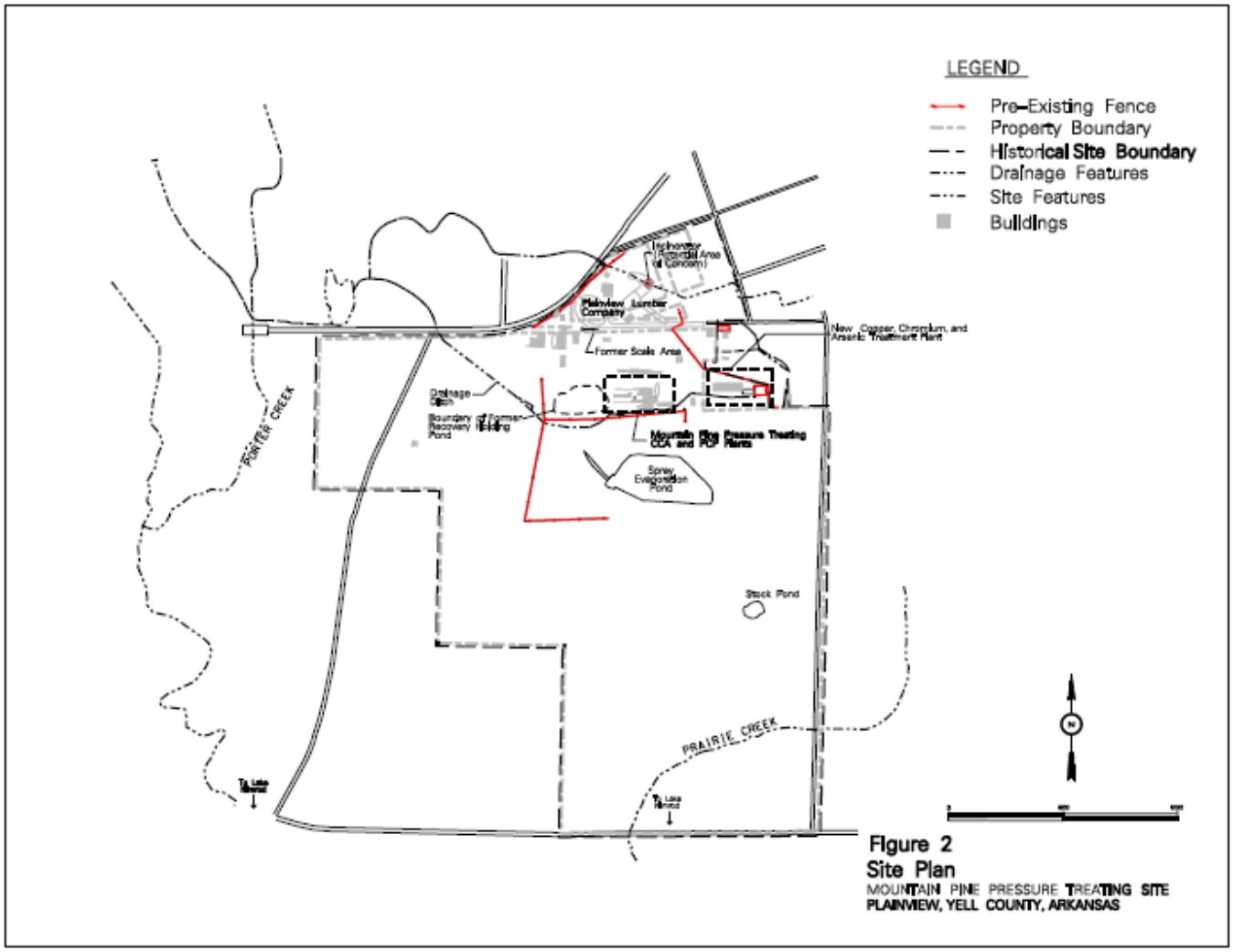


Figure 2
Site Plan
MOUNTAIN PINE PRESSURE TREATING SITE
PLAINVIEW, YELL COUNTY, ARKANSAS

Site Photos:

Mountain Pine Pressure Treating Superfund Site (Historical Photograph taken March 17, 2005)

Mountain Pine Pressure Treating Site (Photograph taken post-remediation on October 26, 2005)

Waste and Volumes

The PCP and CCA wood treatment processes at the MPPT facility involved loading lumber into the PCP or CCA treatment cylinders; filling the cylinder with the treatment solution; and keeping the contents under pressure for eight hours. The pressure was then relieved and a vacuum was applied to remove the excess solution. The lumber was removed from the treatment cylinders and placed on the drip track located west of the cylinders, where excess solution dripped off the lumber. The lumber was then moved to the storage yard of PLC to await sale and shipment to the customers. The excess solution drained to the RHP west of the drip track. At the edge of the RHP was a crude oil-water separator, which separated oil from water in the excess solution. The oil was pumped back to the holding tanks for reuse in the wood treatment process while the water flowed to the RHP. When the RHP became full, the excess liquid was pumped to the SEP. The SEP used a spray apparatus as a means to evaporate the excess water.

The CCA wood treatment process at the CCATP in the eastern area of the site was a closed-loop system. Like the PCP and CCA portion of the MPPT facility in the center of the site, the CCATP process

involved pressure treating lumber in a CCA solution; removing the excess CCA solution; and drying the treated lumber on a drip track. The drip track at the CCATP was sloped toward a sump and catch basin under the treatment cylinder. The waste CCA treatment solution was then pumped through a network of pipes to a tank where it was mixed with rainwater for reuse in the wood treatment process.

Heavy rains in November 1987 caused the RHP to breach its dike, releasing water and suspected PCP. The SEP was also close to overflowing with arsenic-contaminated wastewater. In addition, the CCATP catch basin was observed to have overflowed into Porter Creek adjacent to the site. The EPA initiated a Removal Action in December 1987 that was completed in April 1988. Water was treated and discharged to an onsite drainage ditch with eventual drainage into adjacent Porter Creek. The Removal Action by USEPA Region 6 included: 4,011,550 gallons of water treated using sand and activated carbon; 6,000 cubic yards of sludge and 5,000 cubic yards of contaminated soil in the RHP were mixed with kiln dust and rice hulls and capped with two feet of soil; and 30,000 gallons of CCA treating fluid were disposed of at an offsite permitted facility.

The USEPA proposed listing the MPPT Site on the National Priorities List (NPL) in April 1999 with final listing in July 1999. The USEPA Region 6 conducted the Remedial Investigation (RI) field investigation from April to May 2000. The USEPA Region 6 conducted a Remedial Action (RA) from March 2005 through September 2005. During the Remedial Action which consisted of solidification/stabilization, approximately 10,000 cubic yards of soil and sludge in the RHP and approximately 1400 cubic yards of sediment in the SEP were treated with cement, calcium oxide, ferrous sulfate, and granular activated carbon; and approximately 1,300,000 gallons of water were treated with sodium hypochlorite, granular activated carbon, and activated alumina.

Health Considerations

Based on historic data, certain contaminants associated with the historical wood treating operations at the MPPT Site were identified. During the Remedial Investigation activities the surface soils, subsurface soils, sediment, surface water, and groundwater were investigated and determined to be impacted the by these wood treating compounds. Several contaminants of potential concern (COPCs) were identified including pentachlorophenol (PCP), polychlorinated dibenzodioxin and polychlorinated dibenzofurans (PCDD/PCDF), arsenic, total chromium, copper, and zinc. These COPCs were evaluated by comparing to background concentrations, UESPA, Region 6, residential Human Health Media Specific Screening Levels (HHMSSL) and/or Maximum Contaminant Levels (MCLs). The most prevalent compounds were determined to be pentachlorophenol (PCP) and arsenic.

ADEQ Response Actions

The USEPA proposed listing the MPPT Site on the National Priorities List (NPL) in April 1999 with final listing in July 1999. The USEPA Region 6 conducted the Remedial Investigation (RI) field investigation from April to May 2000. The USEPA Region 6 conducted a Remedial Action (RA) from March 2005 through September 2005. The ADEQ has provided technical support in all of these activities. The USEPA Region 6 is currently conducting groundwater sampling and will propose locations for new groundwater monitoring wells to be installed. The USEPA Region 6 is also drafting

an Operation and Maintenance (O&M) Plan. Upon finalization of the O&M Plan and the installation of the new groundwater monitoring wells, O&M including long-term groundwater monitoring will be transferred to ADEQ.

ADEQ Anticipated Future Activities

Upon completion of the second semi-annual groundwater monitoring event (October 2007), the data from both semi-annual groundwater monitoring events will be evaluated and compiled into a report by the USEPA Region 6. This report will be reviewed and accepted by ADEQ. Based on the evaluation of the groundwater monitoring data, new monitoring wells will be proposed and installed in order to replace wells removed during remedial activities and to evaluate the effectiveness of the remedial action. The USEPA will also draft an Operation and Maintenance (O&M) Plan to be reviewed and accepted by ADEQ. Upon finalization of the O&M Plan and well installation, O&M including long-term groundwater monitoring for the MPPT Site will be transferred to the ADEQ. In addition, institutional controls (ICs) in the form of deed restrictions or city ordinance to prevent excavation and well installation in the areas of remediation will be implemented.

Site Contacts

Project Coordinator:	Dianna Kilburn	(501) 682-0844 Kilburn@adeq.state.ar.us
Information Repositories:	Plainview City Hall 303 West Main Street Plainview, Arkansas 72857	(479) 272-2233

PLAINVIEW LUMBER COMPANY

STATE PRIORITY LIST SITE
PLAINVIEW, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118

EPA RCRA ID No: N/A
EPA CERCLA ID No: ARD006349187
AFIN: 75-00003
County: Yell
Arkansas Senate District: 4
Arkansas House District: 61
US Congressional District: 2

Current Status

The Plainview Lumber Company (PLC) and its subsidiary the Mountain Pine Pressure Treating (MPPT) Site were collectively listed on the National Priorities List (NPL) by the USEPA in April 1999 with final listing in July 1999 as the MPPT Site. Historically, the names have been used interchangeably, adding to some confusion. Additional detailed information concerning the MPPT Site, including the PLC, can be found in the SPL Summary for the MPPT Site.

In 2000, the USEPA selected the MPPT Site, including PLC, as one of 40 new pilots in the second round of the Superfund Redevelopment Initiative (SRI) Program. The City of Plainview received $100,000 grant in financial aid for the reuse assessment and public outreach in 2000 from the USEPA.

In 2001, the City of Plainview received a $50,000 Superfund Technical Assistance Grant (TAG grant) from the USEPA.

In 2003, the Economic Development Administration (EDA) of the U.S. Department of Commerce provided $763,000 and the Arkansas Department of Economic Development (ADED) provided $334,620 to the City of Plainview for reuse/redevelopment of the MPPT Site including PLC. The Prospect Steel Company is currently operating in the PLC portion of the MPPT Site.

In 2005, the MPPT Site, including PLC, received the Phoenix Award for Community Impact and was recognized at the Brownfields Conference in Denver, Colorado. The MPPT Site, including PLC is the

first SRI Site and the first Phoenix Award recipient in Arkansas. The City of Plainview is currently pursuing obtaining new and additional tenants for the remaining portions of the MPPT Site.

State Priority List History

Prior to the initial closure of the PLC facility in 1986, site conditions posed an imminent threat to human health and the environment due to uncontrolled releases of pentachlorophenol (PCP) and chromated-copper-arsenate (CCA). To help mitigate the releases of PCP and CCA which were causing an imminent threat to human health and the environment, the PLC facility was placed on the State Priority List of the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 30.

Site Description

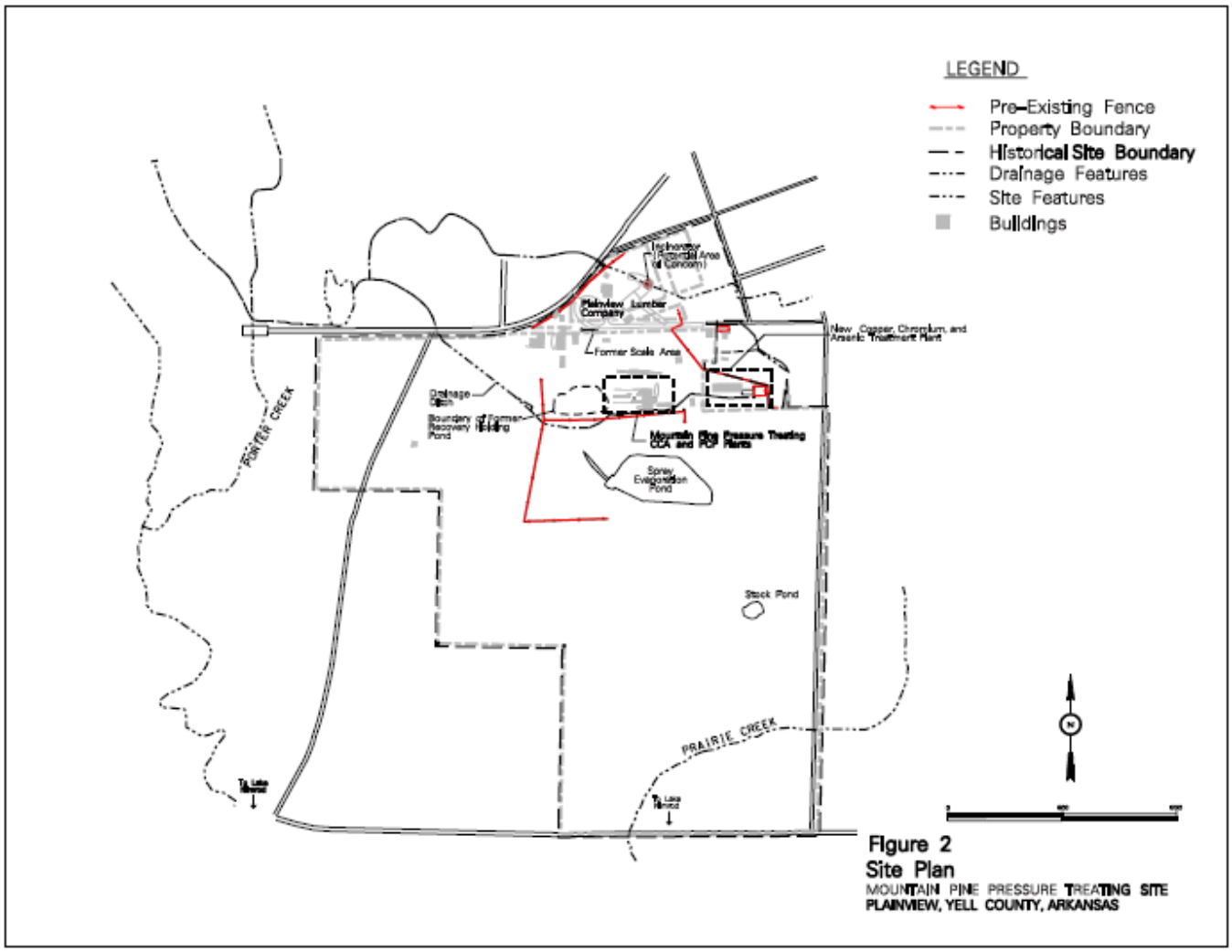
Location: The PLC is located on the southwestern edge of Plainview, Yell County, Arkansas (34°59'00" north latitude and 93°18'12" west longitude). The PLC is located in the northern portion of the MPPT Site, a 95 acre tract of property which encompasses 45 acres of timberland and 50 acres of grassland. The property is bordered on the north by Arkansas State Highway 28; on the east by Plainview, Arkansas; on the south by grass and woodlands; and on the west by Sunlight Bay Road.

Population: Plainview = 685, Yell County = 17,601.

Setting: The MPPT Site consists of three contiguous abandoned facilities: (1) the Plainview Lumber Company (PLC) in the northern area of the site; (2) the Mountain Pine Pressure Treating MPPT) pentachlorophenol (PCP) and chromated-copper-arsenate (CCA) plants in the central area of the site; and (3) the "new" CCA Treatment Plant (CCATP) in the eastern area of the site. The PLC operated as a business involving the sale of raw and treated lumber from 1965 to 1986. The MPPT plants, a subsidiary of PLC, operated as a wood treating facility from 1965 to 1986. The CCATP operated as a wood treating facility from 1980 to 1986, and reopened briefly in 1989 but operational conflicts brought about closure.

Hydrology: Topography at the site is relatively flat with gentle east to west slopes. Surface water drains toward the western and eastern edges of the site, toward the perennial Porter Creek and Prairie Creek, respectively, which both eventually enter Nimrod Lake less than a mile south of the site. Nimrod Lake is the sole source of drinking water for the City of Plainview, and it also serves as a recreational and commercial fishing area. The site is not located in the 100-year flood plain.

Site Diagram:



Site Photos:

Prospect Steel Company located on the former Plainview Lumber Company property.

Waste and Volumes

The PLC facility operated as a sawmill to provide raw lumber for the PCP and CCA wood treatment processes at the MPPT facility. The treated lumber was then moved to the storage yard of PLC to await sale and shipment to the customers. Any excess solution not drained at the end of the treatment process at the MPPT facility would drain in the storage yard.

The USEPA proposed listing the MPPT Site which included the PLC on the National Priorities List (NPL) in April 1999 with final listing in July 1999. Additional detailed information concerning the Remedial Investigation (RI) and Remedial Action (RA) can be found in the SPL Summary for the MPPT Site.

Health Considerations

Based on historic data, certain contaminants associated with the historical wood treating operations at the MPPT Site, including PLC were identified. Additional information can be found in the SPL Summary for the MPPT Site.

ADEQ Response Actions

The USEPA proposed listing the MPPT Site, which included the PLC, on the National Priorities List (NPL) in April 1999 with final listing in July 1999. Additional detailed information concerning the Remedial Investigation (RI) and Remedial Action (RA) can be found in the SPL Summary for the MPPT Site. Operation and Maintenance (O&M) will include long-term groundwater monitoring and will be transferred to ADEQ.

ADEQ Anticipated Future Activities

Any future activities by ADEQ at the PLC will be included in those activities conducted at the MPPT Site; (i.e., O&M including long-term groundwater monitoring). In addition, institutional controls (ICs) in the form of deed restrictions or city ordinance to prevent excavation and well installation in the areas of remediation will be implemented. Additional detailed information concerning future activities by ADEQ can be found in the SPL Summary for the MPPT Site.

Site Contacts

Project Coordinator:	Dianna Kilburn	(501) 682-0844 Kilburn@adeq.state.ar.us
Information Repositories:	Plainview City Hall 303 West Main Street Plainview, Arkansas 72857	(479) 272-2233

Swift Chemical Company, Inc. (Office Site)

STATE PRIORITY LIST SITE ROGERS, ARKANSAS 72756

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118

EPA RCRA ID No: ARD077402345
EPA CERCLA ID No: N/A
AFIN: 04-00634
County: Benton
Arkansas Senate District: 8
Arkansas House District: 96
US Congressional District: 3

Current Status

The investigation for the remediation of this site was initiated by terms and provisions of a November 19, 2003 Consent Administrative order (CAO) entered into by Swift Chemical Company, Inc. (Swift Chemical) and Arkansas Department of Environmental Quality (ADEQ). CAO (LIS 03 - 075) required the facility to remove unlabeled and unmarked drums from the warehouse at the office site. In addition, Swift was required to prevent spillage from the floor drain in the warehouse to the City of Roger's sewer system. It was also noted the bottles of Titanium Tetrachloride had visible corrosion and crystallization on the outside of the containers.

Swift Chemical has removed the drums from the office site and disposed of the drum at an off site permitted disposal facility. The facility will be inspected in the near future to assure compliance with state regulations.

State Priority List History

Swift Chemical Company, Inc. has been in business since 1975 manufacturing industrial cleaners and solvents. The 201 South Arkansas Street location includes one warehouse and manufactures and stores the industrial cleaners and solvents. The site is listed in the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 30.302. It is stated this site has been designated as eligible for State funded investigation and necessary remedial actions. Investigations' regarding this site was initiated based on the provisions of the 2003 Consent Administrative Order.

Site Description

Location: Located in a highly developed area of downtown Rogers. The facility at 201 South Arkansas Street, Rogers, Arkansas is surrounded in all directions by commercial and industrial-use properties. The latitude and longitude of the facility are as follows:

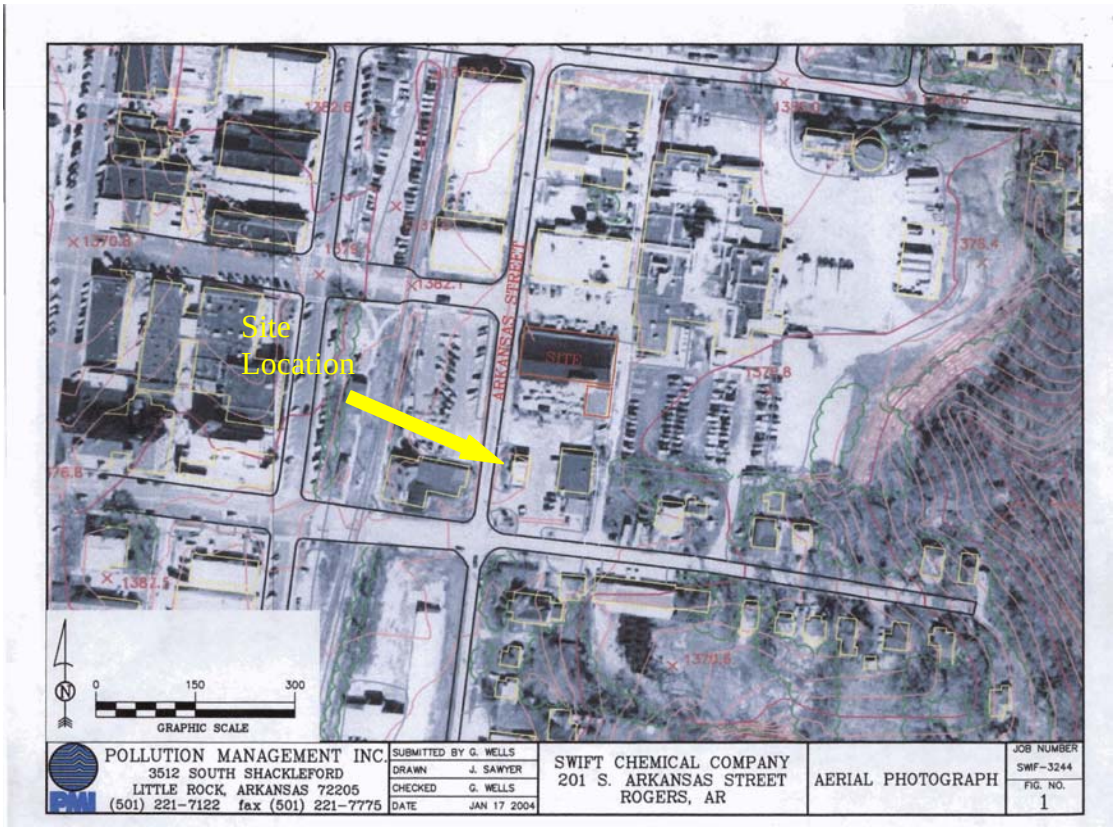
Latitude: 36º 19’ 54.65”
Longitude: 94º 06’ 55.13”

Population: About 38,829 residents live in the City of Rogers.

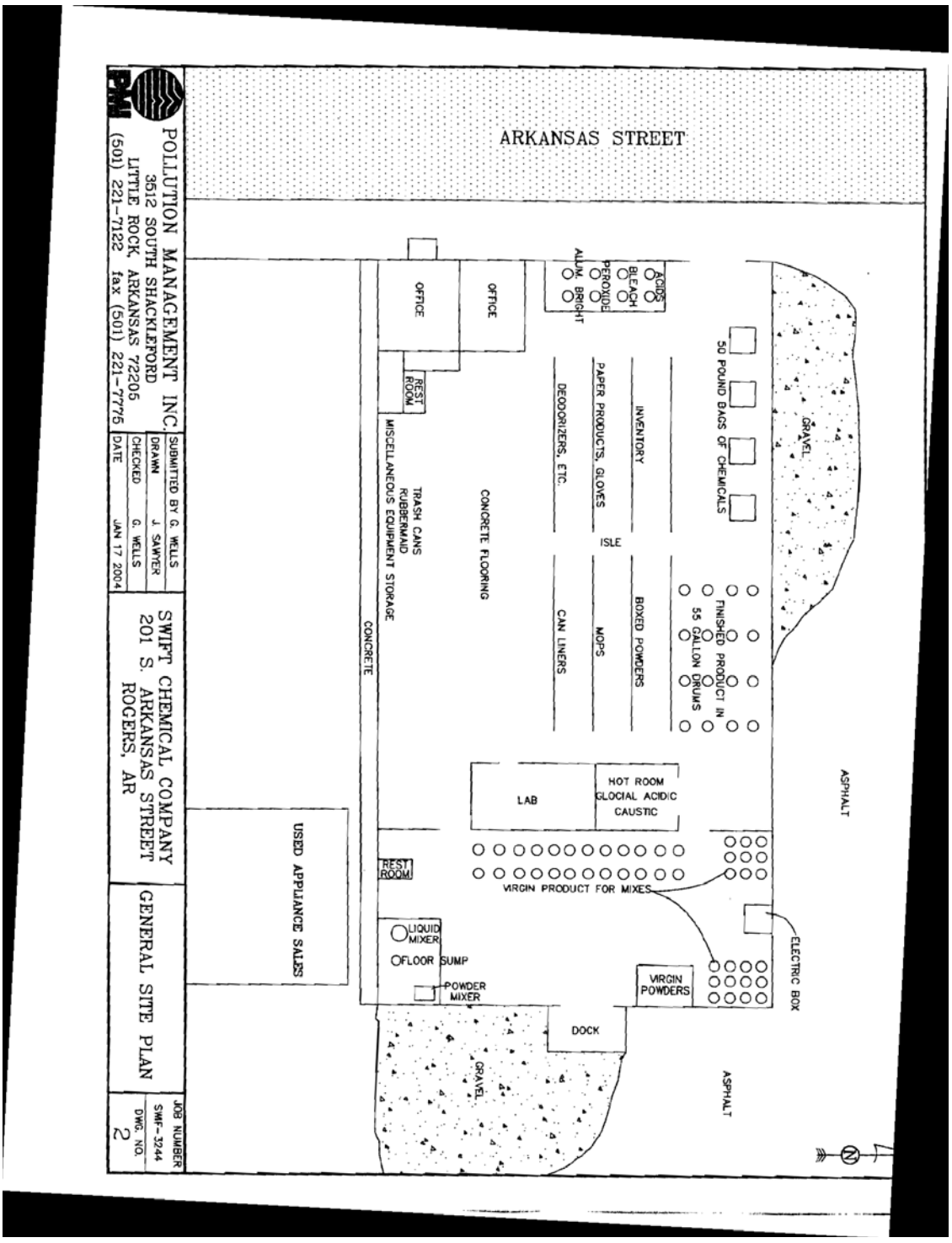
Setting: The approximately 140’ X 75’ (10,500 square feet), single-story building is built on a raised concrete slab and essentially occupies the entire property parcel. The surrounding streets, sidewalks, parking areas and alleyways are public domain owned by the City of Rogers.

Hydrology: No data pertaining to groundwater is provided since the ground surface inside the building is made of concrete. The ground surfaces surrounding the building consist largely of asphalt and concrete.

Aerial Photo:



Site Diagram:



Waste and Volumes

All the drums referenced in the CAO (LIS 03 – 075) have been removed from the facility and disposed of at an off site permitted disposal facility. A drain near the southeastern interior corner of the building has been filled with concrete and sealed. Additionally, the drain for a sink located in the laboratory area has been permanently disconnected by the City of Rogers to eliminate future discharge to the city's sewer system. Regarding liquid Titanium Tetrachloride spill, a hazardous materials team with the City of Rogers' Fire Department responded and completed clean up of the materials.

Health Considerations

There are no health considerations at this site. Based on the information provided in the report submitted by the facility on January 19, 2005, Swift Chemical Company implemented initiatives to comply with ADEQ requirements outlined in the CAO. The facility will be inspected prior to December 30, 2007 to assure that they are in compliance with state guidelines.

ADEQ Response Actions

Investigation of 201 South Arkansas Street location (Office Site) of the Swift Facility revealed unlabeled and unmarked containers. Following the investigation, CAO# LIS 03 – 075 was issued requiring Swift Chemical to remove the drums from the facility. Swift Chemical Company disposed of the drums at a permitted facility and submitted a report on January 19, 2005 to ADEQ explaining the corrective actions that took place at the facility. The office site will be inspected prior to December 30, 2007 to assure that the facility is in compliance with state guidelines.

ADEQ Anticipated Future Activities

The facility will be inspected prior to December 30, 2007 to assure that the facility is in compliance with state guidelines. If it is determined further environmental investigation or assessment at the site does not appear to be justified, ADEQ may attempt to delete this site from the State's priority list.

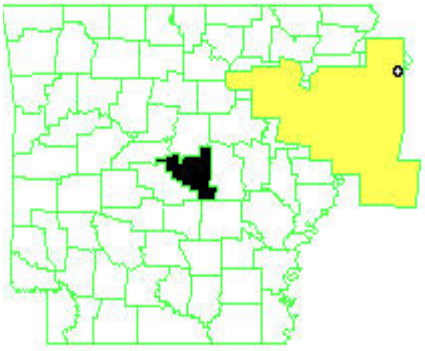
Site Contacts

Project Coordinator:	Mostafa Mehran	(501) 682-0837 mehran@adeq.state.ar.us
Information Repository:	None Officially Required	

VERTAC SUPERFUND SITE

STATE PRIORITY LIST SITE
JACKSONVILLE, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: ARD000023440
EPA CERLCA ID No: ARD000023440
AFIN: 60-00028
County: Pulaski
Arkansas Senate District: 29
Arkansas House District: 44
US Congressional District: 2

Current Status

On July 26, 2001, EPA signed the first Five-Year Review report for the site following a thirty day public comment period. The report is available on the EPA website along with the public comments and the responsiveness summary. The second Five-Year Review report was completed on November 20, 2003.

The next Five-Year review is scheduled for completion by November 20, 2008.

State Priority List History

The site was included on the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 30 Remedial Action Trust Fund Act (RATFA) Hazardous Substance Site Priority List (SPL) in the early 1980's. Funds were allocated for potential investigation and remedial activities.

Site Description

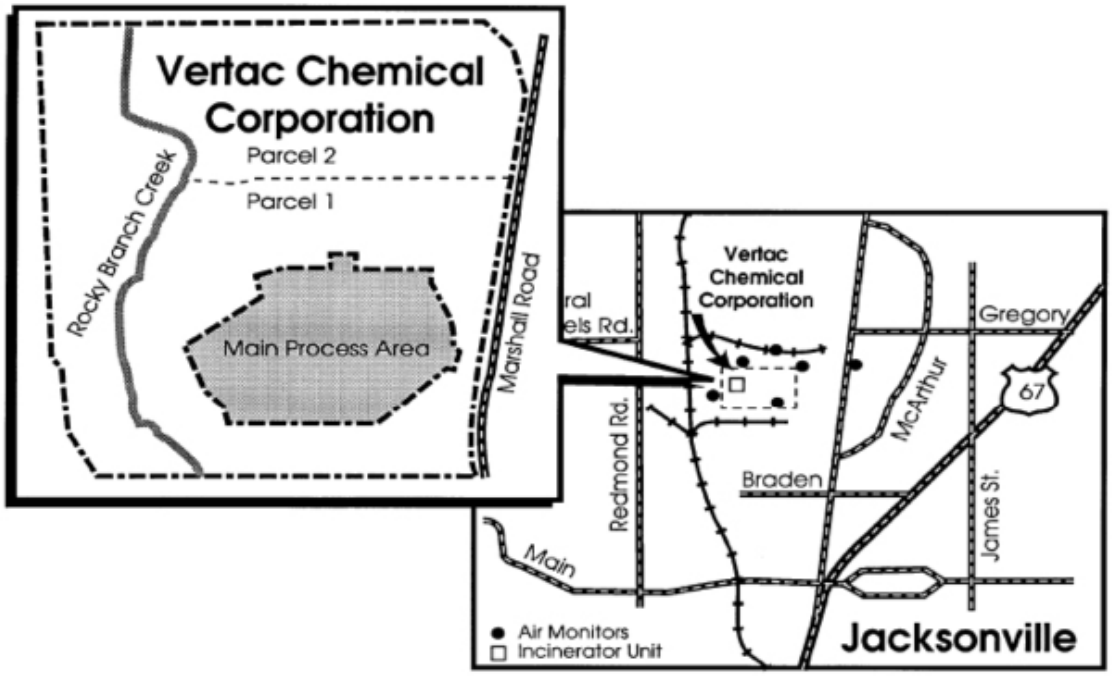
Location: 15 miles northeast of Little Rock, Pulaski County, Arkansas on Marshall Road near western edge of Jacksonville, Arkansas.

Population: There are about 30,000 residents in the City of Jacksonville.

Setting: The nearest residences are immediately adjacent to the plant property to the South and East. The Little Rock Air Force Base is located immediately north of the plant and a light industrial complex is located to the West. The site is zoned commercial/industrial.

Hydrology: The contaminated aquifer at the site is the fractured Atoka Formation. This aquifer is not used as a public water supply in the area due to its limited yield, and is not used for domestic purposes in the immediate vicinity of the site.

Site Map



Waste and Volumes

Principal Pollutants:
2,3,7,8-TCDD (dioxin)- as high as 2,800 parts per billion (ppb) in soils; as high as 37 parts per million (ppm) in drummed wastes 2,4-D 2,4,5-T
Chlorinated benzene Chlorinated phenols
Herbicide production wastes

Volume:
28,440 drums of herbicide production waste.
Several thousand cubic yards of liquid and solid wastes.
Landfills and burial areas with several thousand cubic yards of various wastes.
Several thousand cubic yards of contaminated buildings and equipment.

Approximately 20,000 cubic yards of contaminated soils and sediments.
Approximately 1,000 tons of highly contaminated shredded trash and pallets.
Approximately 1,120 tons of TCB (tetrachlorobenzene) contaminated soils.

Health Considerations

The Remedial Investigations evaluated risks to human health and the environment. Results from the risk assessments identified future risks to future workers at the site due to ingestion of contaminated soils, surface water, and groundwater. Future risks were also determined due to contamination of a nearby stream from surface water runoff.

ADEQ Response Actions

Records of Decision (ROD)
Signed: September 27, 1990 (Off-site Areas)
Signed: June 30, 1993 On-site OU1 (Above Ground)
Signed: September 17, 1996 OU2 (Soils)
Signed: September 17, 1996 OU3 (Ground water)

Offsite Areas ROD components: (All components completed in mid 1997)
Dewater and Cap aeration basin and cap sludge drying beds in the sewage treatment plant. (Completed November 1995)
On-site landfilling of digester sludge, and sewage collection line sediments. (Materials have been consolidated on-site, and were landfilled in mid 1997.)
Excavation of contaminated Rocky Branch Creek flood plain soils/sediments. (Excavation and onsite disposal were completed in mid 1997.)
Remove dioxin contaminated sediments from the Rocky Branch sewer interceptor, slipline, and landfill the contaminated sediments. (The removed sediments were temporarily stored on-site, and were placed in the on-site landfill in mid 1997.)
Excavation of off-site residential soils. (Excavation of the contaminated soil was completed in 1988. The materials were stored on-site in "supersacks" then disposed on-site in the summer 1997.)

On-site OU1 (Above Ground) ROD components: (All components completed in mid 1997)
Demolish the on-site buildings and equipment and consolidate the debris in an on-site hazardous waste landfill.
Off-site incineration of transformer PCB oils.
Off-site recycle/reuse of decontaminated process equipment (such as tanks, structural steel, pumps, etc.), to the maximum extent practicable.
Off-site incineration of shredded trash and pallets and the wastes in the process vessels.

OU2 (Soils, Foundations, and Underground Utilities) ROD components: (All components completed in the Summer and Fall 1997)
The excavation of dioxin contaminated soils at or above the action level of 5 parts per billion. The

excavation and off-site incineration of crystalline tetrachlorobenzene (TCB) and TCB contaminated soils at or above the action level of 500 parts per million.
The disposal (in the on-site landfill) of approximately 2,770 cubic yards of dioxin contaminated soils excavated in 1990 from adjacent residential areas.
The disposal (in the on-site landfill) of approximately 4,100 cubic yards of dioxin contaminated soils from the Rocky Branch Creek flood plain in conjunction with the Off Site Areas ROD.

OU3 (Ground Water) ROD components: (All wells were installed in the Winter 1997/1998, and groundwater treatment and monitoring will continue indefinitely)
Install ground water extraction wells to eliminate the eastward component of ground water flow and retract the eastern extension of the contamination plume.
Continue to utilize an existing French drain to restrict westward movement of the contamination plume. (The French drain installation was completed in 1986 as part of the "Vertac Remedy" and will continue to be utilized perpetually to prevent westward off-site migration of contaminated groundwater and oily leachate from the on-site unlined burial areas.)
Impose institutional controls (deed restrictions) to prohibit water supply wells in the area of the site.

ADEQ Anticipated Future Activities

The next EPA Five-Year review is scheduled for completion by November 20, 2008. ADEQ will review the Five-Year Review Report. O&M is handled by the PRPs.

Site Contacts

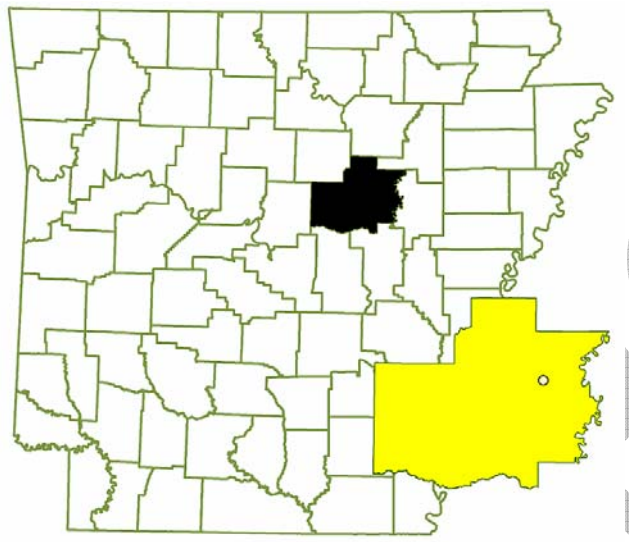
Project Coordinator:	Annette Cusher	(501) 682-0841 cusher@adeq.state.ar.us
Information Respository:	City of Jacksonville City Hall 1 Municipal Drive Jacksonville, AR 72076	(501) 982-0686

Arkansas General Industries

STATE PRIORITY LIST SITE
Bald Knob, ARKANSAS

PROPOSED

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: ARD035434596
EPA CERCLA ID No: N/A
AFIN: 73-00022
County: White
Arkansas Senate District: 29
Arkansas House District: 49
US Congressional District: 2

Current Status

Arkansas General Industries (AGI) began manufacturing sub-fractional alternating current and direct current electric motors used primarily in the appliance and automotive industries at the Bald Knob site in the late 1950's. The facility has used 1,1,1,-Trichloroethane (TCA), Trichloroethene (TCE), and xylenes as solvents in their processes. Xylene is the solvent currently used at the site. In June and July of 1996 EnSAFE preformed an environmental assessment which discovered TCE in the groundwater within the property boundary. In August on 1996 AGI entered into CAO LIS 96-093 to satisfy a requirement for environmental due diligence required by a loan commitment obtained under a bankruptcy reorganization plan. Pollution Management, Inc. (PMI) preformed a Phase I Facility Investigation under this order. Further delineation of contamination was reported in the Phase II Facility Investigation Report dated December 21, 1999. The Phase II investigation assessed the subsurface conditions related to TCE and daughter products on the facility boundaries and adjoining properties. Some of these properties are residential. AGI then defaulted on their loan commitments. The assets and name of AGI were sold; however the current owners of AGI opted to lease the Bald Knob property.

State Priority List History

This site is proposed for the Site Priority List (SPL). The following points are from the 1999 Phase II Facility Investigation Report Executive Summary by PMI:

- 14.4 acres were impacted by dissolved phase TCE
- the total mass of TCE dissolved in groundwater was approximately 4,146 Kg or 9,121 pounds (estimate calculated from available data)
- An estimated 2,662,751 gallons of groundwater has been impacted by TCE
- Based on 1999 groundwater measurements, the linear groundwater flow velocity is toward the northeast at an estimated rate of 0.079 ft/day
- "The absence of measurable organic carbon in the aquifer matrix is allowing the TCE to advance along the groundwater gradient at an estimated rate of 0.076 ft/day, with almost no adsorption or an appreciable decrease in apparent velocity."
- TCE degradation products were found in one sample of the groundwater suggesting that TCE degradation is limited
- The TCE plume appears to have migrated off-site, underneath a residence and a restaurant.

There is a large pond located less than one half of a mile in the direction of groundwater flow. Several residences are in the path of this plume.

Site Description

Location: The site is located at 102 Miller Street in the city limits of Bald Knob, Arkansas. There are several residences in close proximity to the facility.

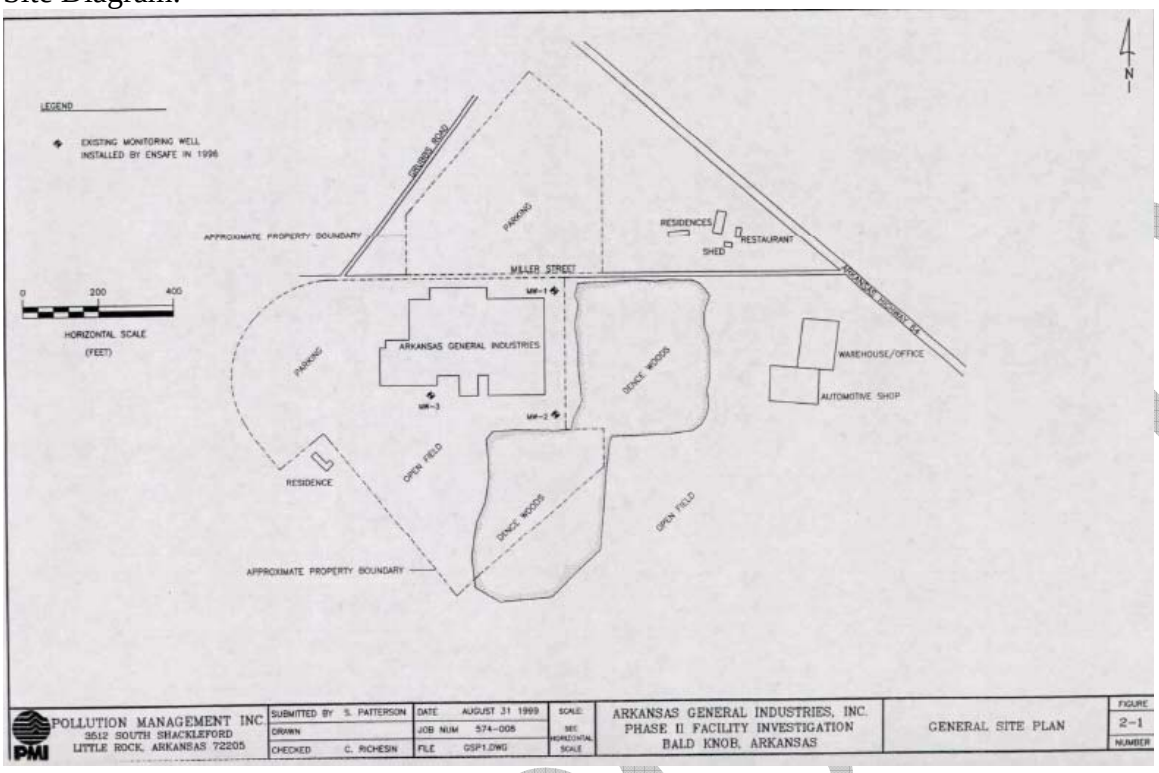
Population: The estimated population of Bald Knob is 3,210.

Setting: The site is currently operated by Arkansas General Industries (AGI), which is separate from the AGI that is responsible for the contamination. The current AGI leases the property. The property is located in a mixed industrial and residential area. Gum Creek is close to the site. There is also a large pond within a half of a mile of the site.

Hydrology: This site is relatively flat. Site drainage leaves the facility south east in a drainage ditch which joins Gum Creek.

Aerial Photo:

Site Diagram:



Waste and Volumes

This site is proposed for the Site Priority List (SPL). The 1999 Phase II Facility Investigation Report Executive Summary by PMI indicated the total mass of TCE dissolved in groundwater was approximately 4,146 Kg or 9,121 pounds (estimate calculated from available data). A probable source area has been identified approximately100 to 150 feet west of the southeast corner of the facility. TCE concentrations in the soil range from 8800ug/kg at 0-5 feet to 7400 ug/kg at 14 feet to 17ug/kg at 17 feet below ground surface (bgs).

Health Considerations

TCE and daughter products have been detected in the groundwater. The groundwater flow velocity was estimated by PMI to be .076 feet per day to the northeast. The highest concentration of TCE in groundwater was 27,000 ug/l (MW-6B about 20 feet bgs). This well is near the road, close to a residential area. The federal maximum contaminant limit for TCE is 5 ug/l. No risk evaluation has been preformed regarding this site.

ADEQ Response Actions

This site is proposed to be included on the SPL for investigation and remediation.

ADEQ Anticipated Future Activities

Future activities should include a site assessment to determine current site conditions as well as the need for remedial activities.

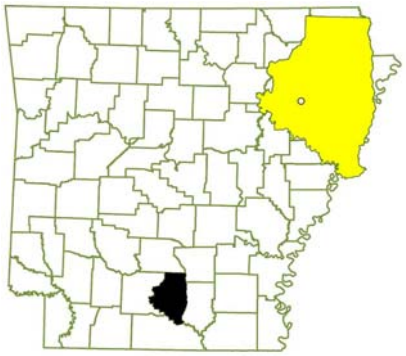
Site Contacts

Project Coordinator:	Annette Cusher	(501) 682-0841 cusher@adeq.state.ar.us

BEI DEFENSE SYSTEMS, INC.

STATE PRIORITY LIST SITE
EAST CAMDEN, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: ARD980583470
AFIN: 52-00163
County: Calhoun
Arkansas Senate District: 25
Arkansas House District: 8
US Congressional District: 4

Current Status

BEI leased the facility from Highland Industrial Park, Inc. starting in 1966. BEI assembled Hydra 70 rocket components including the MK66 rocket motor, and the M267, M274, and M261 practice warheads. BEI suspended ordnance plant operations in Highland Industrial Park on August 30, 1996.

State Priority List History

BEI generated waste from the rocket production and warhead assembly operations and then burned these wastes in the Burn Area located in the northeast corner of the BEI facility in the Highland Industrial Park. The primary waste that were burned in the Burn Area included paint wastes, paint stripper, and stencil ink residue; spent 1,1,1 trichloroethane; off-specification rocket propellant grains, grenades, and miscellaneous explosives; and cadmium-contaminated rags. Wood and paper products were also burned in this area on an "as-needed" basis. A Consent Administrative Order (CAO) (LIS 89-147) was issued for the burn area between BEI and the Arkansas Department of Pollution Control and Ecology. The order required BEI to investigate and remediate the area. The investigation, removal, and off-site disposal of metal-contaminated soil took place in late 1990 and early 1991. BEI contracted with FTN in April 1996 to perform a site review for the purpose of assessing environmental conditions at the facility prior to transferring the property to a new lessee. Findings of the review resulted in a groundwater

investigation. Data collected during the groundwater investigation are noted in the waste and volumes section of this summary.

Site Description

Location: The BEI site is located in Highland Industrial Park approximately 2 miles northeast of East Camden Arkansas in Calhoun County (T13S, R15W, Section 7). The address is Highway 274 12m E Ind. Park East Camden, AR. 71701

Population: Estimated population of East Camden is 902.

Setting: Highland Industrial Park comprises 17,000 acres of an original 65,000 acres that was formerly the Shumaker Naval Ammunition Depot which was operated from 1944 to 1957 and demilitarized between 1957 and 1961. The depot was then purchased by Brown & Root in 1961 and used largely for a salvage operation until the mid 1960s. The old depot was converted to an industrial park in 1965. BEI leased the facility which occupied 120 acres within the Highland Industrial Park, Inc. starting in 1966. Wastes generated by BEI were burned in the northeast portion of the property known as the Burn Area. BEI suspended ordnance plant operations on August 30, 1996.

Hydrology: The industrial park area is characterized by low, timber covered hills and flatlands with minimal relief and is located in the Two Bayou watershed. Two Bayou flows approximately 6 miles south and empties into the Ouachita River in an area southeast of Camden. Numerous ditches have been constructed and creek flow modified to provide drainage for the industrial park. The BEI site is drained by ditches that flow under Byrnes Road. and eventually into Dogwood Creek. This creek is located on the northern side of the BEI facility and drains in a west-southwesterly direction to its confluence with Two Bayou Creek approximately 2 miles from the Burn Area.

Aerial photo of Facility

Waste and Volumes

BEI's primary waste that were burned from 1966 to 1996 in the Burn Area included paint wastes, paint stripper, and stencil ink residue; spent 1,1,1 trichloroethane; off-specification rocket propellant grains, grenades, and miscellaneous explosives; and cadmium-contaminated rags. Wood and paper products were also burned in this area on an "as needed" basis. Metals were not detected in groundwater; however 10 volatile organic compounds (VOCs) were found. The total volatile organic compounds (VOCs) plume is estimated to encompass an area of approximately 140,280 square feet, or 3.2 acres. VOC levels in Direct Push Technology (DPT) groundwater samples were lower than concentrations measured in samples that were collected from developed monitoring wells. The development indicated concentrations of benzene, 1,2, Dichloroethane, 1,1 Dichloroethene, 1,1,1 Trichloroethane, Trichloroethene, and 1,1,2 Trichloroethane in groundwater exceeding their respective Maximum Contaminate Levels (MCLs). Soil sampling analysis indicated no presence of VOCs detected in soils between 3.5 to 11.8ft bgs. Although, based on metal analyses, approximately 6 inches of soil was excavated for stabilization and offsite removal in accordance with the Closure Plan. Contaminants that were found in groundwater during the groundwater investigation may occur as both light and dense non-aqueous phase liquids (NAPLs). The contaminants noted above are present at concentrations well below the 1% solubility level with the exception of 1,1 Dichloroethene where data indicated this compound is present at approximately 2% of its aqueous solubility, suggesting NAPL may be present.

Health Considerations

Contaminants in groundwater exceeding Maximum Contaminant Levels (MCLs) could pose a potential risk to groundwater users in the area. Past operations in the Burn Area may have affected groundwater quality in a 3.2 acre area beneath the site. Constituents found in groundwater samples included benzene, 1,2, Dichloroethane, 1,1 Dichloroethene, 1,1,1 Trichloroethane, Trichloroethene, and 1,1,2 Trichloroethane which all exceed their respective USEPA, Region 6, MCLs. No VOCs were detected in unsaturated soils above the contaminant plume. Based on metal analyses, approximately 6 inches of soil was excavated for stabilization and offsite removal in accordance with the Closure Plan in 1991. The source area, therefore, was likely removed during 1991 closure activities, volatilized, or degraded to concentrations below detection levels. Cleanup action may be limited to groundwater remediation.

ADEQ Response Actions

ADEQ is proposing this site to be listed on the State Priority List to insure the remediation of any risks to human health and the environment. ADEQ is currently initiating contact with BEI to encourage their participation and responsibility for further site investigation and remediation.

ADEQ Anticipated Future Activities

The environmental risks posed by contaminants at the site Burn Area should be further evaluated. This information will then be used to develop proposed groundwater protection standards. The feasibility and cost of technologies available to meet the cleanup objectives would be evaluated and the preferred remedial option(s) would be selected. Installation of additional monitoring wells may be required for adequate sampling results. Following the development of monitoring wells, groundwater protection

standards, and remedial option selected, a remedial action plan (RAP) will be prepared. The RAP will contain detailed guidance for the remedial actions at the site.

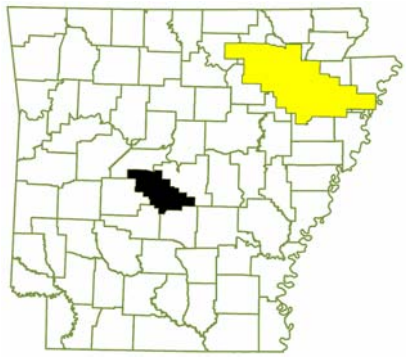
Site Contacts

Project Coordinator:	Jim Rigg	(501) 682-0832 rigg@adeq.state.ar.us

MINTON PROPERTY

STATE PRIORITY LIST SITE
ALEXANDER, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA CERCLA ID No: ARR000011106
AFIN: 63-00462
County: Saline
Arkansas Senate District: 22
Arkansas House District: 29
US Congressional District: 02

Current Status

The Minton Property is solely residential in nature, and is located on approximately 17 acres of land northwest of the city limits of Alexander, Saline County, Arkansas. The property is located in extreme Saline County within a rural residential area.

In September 2002, a complaint was filed with the Arkansas State Plant Board (ASPB) regarding possible pesticides under the crawl space of the residence. Upon investigation by the ASPB and the Arkansas Department of Environmental Quality (ADEQ), the crawl space was found to contain several damaged bags of DDT (Dichlorodiphenyltrichloroethane).

In October 2002, the well water at the residence was tested and found to have 57 parts per billion (ppb) DDT in the water (Arkansas Department of Health and Human Services). The allowable level of DDT in residential drinking water is 0.2 ppb to 2 ppb.

Prior to the aforementioned test, approximately 1600 pounds of 50 percent wettable DDT were discovered under the crawl space of the house. It is believed the previous owner, now deceased, stored the banned hazardous substances at the residence. On January 22, 2007, the DDT (U061), along with two 30-gallon drums of chlordane (D020 and U036) found after inspection of the property in 2002, were removed from the property and taken to Clean Harbors in El Dorado for disposal. This was done at the current property owner's expense.

Inspection of the property on January 25, 2007 confirmed removal of the aforementioned hazardous substances. Debris still remains under the crawl space, and residual levels of powdery substances can be seen on the ground inside the crawl space. The drums, and other empty containers have been picked up around the area in back of the pond.

On April 17, 2007 a soil sampling event was conducted by ADEQ. ADEQ determined the crawl space to have unacceptable concentrations of DDD and DDT.

On April 24, 2007 a water well sampling event was conducted by the Arkansas Department of Health (ADH). The well water was found to contain no cancer-causing contaminants.

On June 6, 2007 a letter was sent to Mrs. Dana Minton with instructions regarding the removal of surface soil and debris from within the crawl space of the residence. ADEQ received no response from Mrs. Minton.

On October 11, 2007 a second letter (certified) was sent to Mrs. Dana Minton. This time, ADEQ received a letter of response from Mrs. Minton. In the letter, dated October 28, 2007, Mrs. Minton explained the financial limitations associated with immediate compliance of the ADEQ recommendations as laid out in the June 6, 2007 ADEQ letter. In the letter, Mrs. Minton also explained that January through April were peak months for her business, and that a delay would allow her to generate the income necessary to fulfill the ADEQ recommendations.

On November 21, 2007 a third letter (also certified) was sent to Mrs. Dana Minton. In this letter, ADEQ extended the deadline for removal of surface soil and debris from within the crawl space of the residence. Per this letter, Mrs. Dana Minton was to report to ADEQ by February 1, 2008 the selection of a contractor and a plan (with timeline) for the removal and disposal of the aforementioned debris and surface soil, as laid out in the June 6, 2007 ADEQ letter.

State Priority List History

ADEQ proposes to add the Minton Property to the State Priorities List in order to investigate the extent of contamination and address any remaining risks to human health and the environment.

Site Description

Location: The City of Alexander adjoins Little Rock, Pulaski County to the southwest of Little Rock along US Interstate 30. The Minton Property is located northwest of the Alexander city limits at 7125 Anderson Road in Alexander, Saline County, Arkansas.

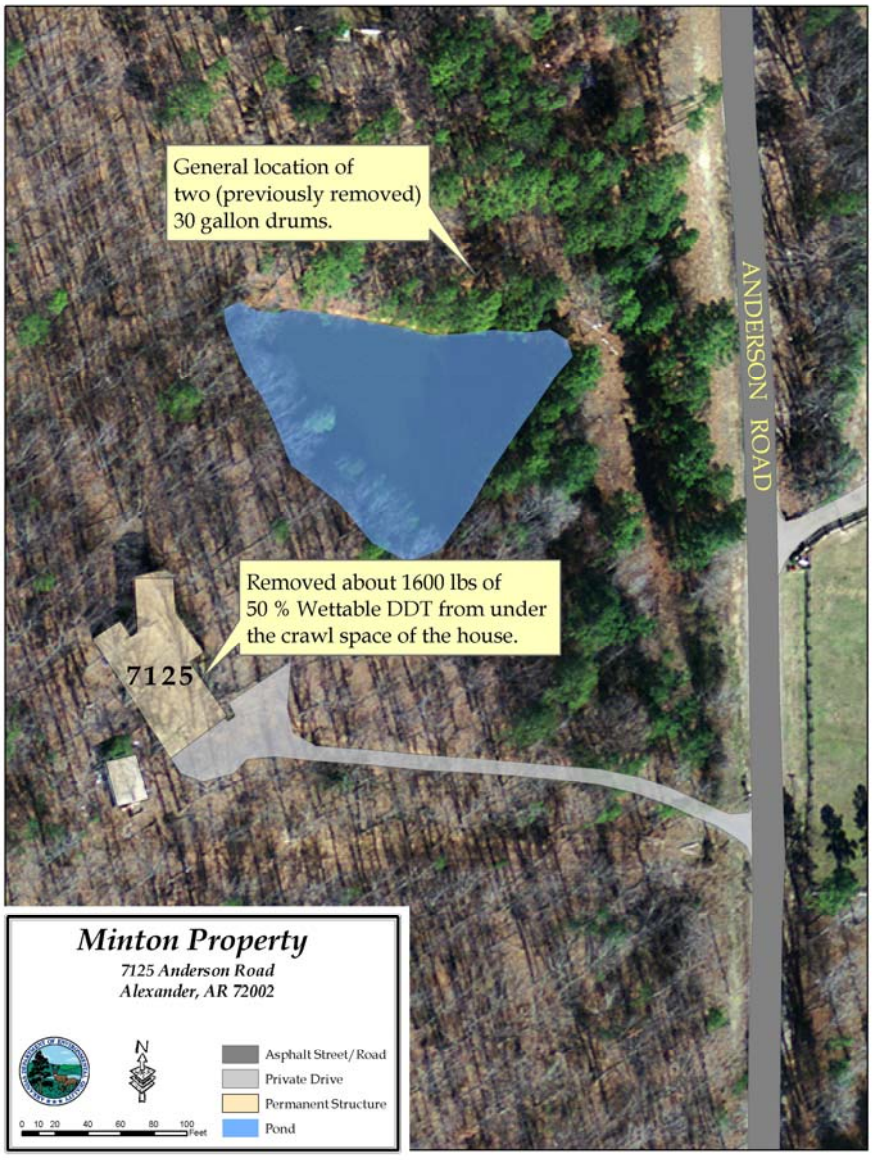
Latitude: 34° 39’ 38.30” N
Longitude: 092° 28’ 47.39” W

Population: About 614 residents are in the City of Alexander, Arkansas.

Setting: The Minton Property is located in a rural area, not supplied by municipal drinking water. The property is located on an approximately 17 acre tract of land northwest of the city limits of Alexander, Arkansas.

Hydrology: The Minton Property is located in the Ouachita Mountains physiographic region of Arkansas, which is characterized as mostly Paleozoic sandstones, shale and novaculites. The most prominent hard rock mineral is quartz crystal for which this region is known.

There are six groundwater wells located within a 0.25-mile radius of the site.



Aerial Photo: Minton Property, Alexander, Arkansas (2006).

Photo: Front of house on Minton Property.

Waste and Volumes

Areas of Contamination: These areas include the north side of the pond, and the crawl space of the home.

Principal Pollutants: DDT (U061) and chlordane (D020 and U036).

Volume: 1600 pounds of 50 percent wettable DDT were located under the crawl space of the residence.

Two 30-gallon drums of an unknown substance (identified as chlordane) were located north of the pond.

On January 22, 2007 these source contaminants were removed from the property by Waste Services Inc.

Health Considerations

Per the November 21, 2007 ADEQ letter to Mrs. Dana Minton:

- Padlocks on the crawlspace doors remain in place and access is restricted until the removal of debris, and further testing is completed.

- Anyone that does end up needing access during this time must be thoroughly informed of the presence of DDD and DDT in the crawlspace.

Private well water samples, collected at the Minton Property by the Arkansas Department of Health, on April 24, 2007, showed no cancer-causing contaminants in the drinking water.

ADEQ Response Actions

Complaint – 09/2002 (to the ASPB)

Removal – 01/22/2007 (at owner's expense)

Site Investigation – 04/17/2007 (soil sampling: ADEQ lead)

Site Investigation – 04/24/2007 (well water sampling: ADH lead)

ADEQ Anticipated Future Activities

Mrs. Dana Minton was to report to ADEQ by February 1, 2008 the selection of a contractor and a plan (with timeline) for the removal and disposal of the aforementioned debris and surface soil, as laid out in the June 6, 2007 letter. Mrs. Minton did not meet this deadline.

ADEQ will work with the property owner to remove the residual DDT from the soil. If the property owner fails to comply with completing the removal, then ADEQ may hire a contractor to conduct the clean-up process and seek cost recovery from the property owner.

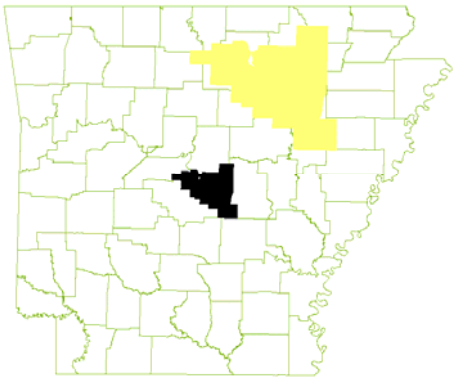
Site Contacts

Contact: Dennis Green (501) 682-0874

VALSPAR CORPORATION

STATE PRIORITY LIST SITE
LITTLE ROCK, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No.ARD059634659
EPA CERCLA ID No: N/A
AFIN: 60-00650
County: Pulaski
Arkansas Senate District: 32
Arkansas House District: 51
US Congressional District: 2

Current Status

The facility is currently inactive and is up for sale. The facility submitted a Comprehensive Site Assessment (CSA) with amendments to ADEQ in December 2006. The CSA indicates groundwater contamination. ADEQ approved the CSA contingent upon a deed restriction being placed on the property to require no new construction, no disturbance of soils in area unless by a public utility, and no use of the groundwater. If any of the restrictions need to be altered, a site reassessment will have to be completed and approved by ADEQ. To date, ADEQ has not been advised that a deed restriction has been placed on the property.

State Priority List History

The Site has historic RCRA violations. In addition, based on the recent CSA, there is evidence of groundwater contamination at the site.

Site Description

Location: The site is located within the city limits of Little Rock, AR on the south side of town 34° 36'59.03" North Latitude, 92° 15'23.24" West Longitude, 1900 East 145th Street.

Population: 183,133

Setting: The Site is approximately an 8-acre square tract of land. The Site is secured with a chain link fence topped with barbed wire and the front access gates are locked. The site is currently vacant.

Hydrology: The Site topography is relatively flat with a radial slope away from the building and a slight slope to the south. Regionally, the topography slopes slightly to the southeast. Based on observations made during the site visits, it appears that the Site is slightly higher than the surrounding land. Thus, storm water run-off would infiltrate into the grassy areas and/or flow overland off-Site in a radial pattern. Storm water which flows to the south would be intercepted by a drainage ditch located on the north side of 145th Street. No obvious run-on paths were observed during the Site visits.

Aerial Photo: Valspar Inc. Little Rock, Arkansas

Waste and Volumes

From 1972 to 2001, the Site was used to manufacture water and solvent-based coatings for the wood products industry. The facility under different ownerships was classified has a large quantity generator (LQG) which means there were more than 2,200 pounds generated per month. Guardsman Chemical Coatings had the property from 1972 thru 1988 and notified as an LQG in 1980. Lily Industries acquired Guardsman in 1988 and continued operating the Site. In December 2000 Valspar acquired Lily. Valspar shut down the site in 2001. Wastes generated at the Site were waste solvents, off specification thinners, and lacquers.

Health Considerations

Human Health Medium Specific Screening Levels (HHMSSLs) for Volatile Organic Compounds (VOCs) in soils for industrial workers have been exceeded. Areas of contamination are in the western

Above Ground Storage Tank (AST) area and beneath the pavement. Groundwater VOCs have exceeded Maximum Contaminant Levels (MCLs) or HHMSSSLs. Compounds of concern are acetone, benzene, 2-butanone (MEK), 1,2-dichloroethene, ethylbenzene, methyl tertiary butyl ether, 4-methyl-2-pentanone (MIK), trimethylbenzene, vinyl chloride, and total xylenes. The same areas of contamination apply to the groundwater.

ADEQ Response Actions

The following are a list of significant reports reviewed by ADEQ:

- Phase I Environmental Site Assessment by ENSR dated May 30, 2001
- Limited Phase II Investigation Report by ENSR dated March 8, 2004
- Phase I Environmental Site Assessment for Valspar Industries, Inc. by Atoka, Inc. dated April 2, 2004
- Phase II Investigation Report by ENSR dated August 5, 2004
- Groundwater Investigation Report by ENSR dated October 28, 2004 and
- Summary of Existing Data for voluntary cleanup Program Enrollment by ENSR, dated March 2, 2005
- Comprehensive Site Assessment Work Plan by ENSR, dated April 10, 2006, and July 12, 2006 letter Addendum.
- Comprehensive Site Assessment received by ADEQ on December 21, 2006.
- CSA approval letter with deed restrictions for Valspar sent July 7, 2007.
- Valspar draft Deed Restriction dated August 10, 2007 and E-mailed on August 23, 2007.
- ADEQ response dated September 28, 2007 to Draft Deed Restrictions restating what the restrictions are and any on site activity that could potentially disturb the groundwater would required a Site Assessment specifically a Risk Assessment.
- Follow-up conference call in December 2007, with Valspar and contractor ENSR indicated Risk Assessment activities will be done.

ADEQ Anticipated Future Activities

Valspar has not indicated what their intentions are at this time on either placing the Deed Restrictions on the property as issued by ADEQ or further assessing the conditions at the Site. ADEQ will work with the property owner to place a Deed Restriction on the property or to get a new risk assessment for the Site. If the property owner fails to do either of the above, ADEQ will hire a contractor to perform work at the site to ensure the safety of workers and future tenants and seek cost recovery from any responsible parties.

Site Contacts

Project Coordinator: Dennis Green Phone: 501-682-0874

VALUE LINE COMPANY

STATE PRIORITY LIST SITE

701 SOUTH 3RD STREET
ARKADELPHIA, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118

EPA CERCLA ID No: AR0000000331
AFIN: 10-00234
County: Clark
Arkansas Senate District: 20
Arkansas House District: 26
US Congressional District: 04

Current Status

This site is a former manufacturer of wooden motel furniture. The painting or staining of the furniture during the manufacturing process resulted in the generation of hazardous waste by the facility.

While in operation, Value Line Company generated waste ignitable liquids (Methyl Ethyl Ketone, D001 and D035).

In the fall of 2004, the owner (Hal Kidd) moved his operations to Leakesville, Mississippi. According to Value Line Company's 2004 Annual Report, the property belongs to Carol Kidd, Hal Kidd's ex-wife. According to the Clark County Tax Assessors office, Ms. Kidd operated the site under the name of Harvest Ministries. In 2006, she conveyed the property to Ouachita Baptist University. Ouachita Baptist University uses the facility as maintenance storage.

Site History

On July 24, 1995, and on July 28, 1995, the Arkansas Department of Pollution Control and Ecology (now know as the Arkansas Department of Environmental Quality (ADEQ) issued a Notice of Violation (NOV) to Value Line Company of 701 South 3rd Street (NOV LIS 95-110) and 1205 North 10th Street (NOV LIS 95-112) in Arkadelphia, Arkansas, respectively. The NOVs were issued based on findings noted during the compliance evaluation inspections conducted at the facilities on September 9, 1993.

A hearing was held on July 30, 1996 at the Arkansas Pollution Control and Ecology Commission's office by Michael O'Malley, Administrative Hearing Office (AHO). Judge O'Malley issued a recommended decision directing Value Line Company to pay a civil penalty of $60,500 for the 3rd Street facility and comply with Paragraphs 4 through 32 in the NOV and pay a civil penalty of $65,500 for the North 10th Street facility and comply with Paragraphs 4 through 31 in the NOV. On July 28, 1997, Value Line Company, through its attorney, requested an oral argument before the Arkansas Pollution Control and Ecology Commission (the Commission). Minute Order Number 97-41, was issued by the Commission on September 19, 1997, affirming the NOV as modified.

On October 22, 1997, Value Line Company filed a Notice of Appeal to the Circuit Court of Clark County, Arkansas. On February 19, 1999, Judge David Switzer, 18th Judicial Circuit-East, affirmed all aspects of the recommended decision with the exception of the civil penalty. This decision became effective on or about March 22, 1999. The court remanded this matter to the Commission to take testimony in regard to the factors to be considered in arriving at the civil penalty in the recommended decision.

A hearing was held on August 19, 1999, by the Commission's AHO. On February 2, 2000, the AHO issued a recommended decision. In the recommended decision, the combined total civil penalty for both facilities was reduced to $73,059. ADEQ and Value Line Company each appealed the AHO's recommend decision to the Commission. On June 23, 2000, the Commission ruled in favor of ADEQ, thereby reinstating the combined total civil penalty of $125,500 for both facilities.

Value Line Company again appealed the Commission's decision to the Circuit Court of Clark County. On December 18, 2001, Judge Switzer issued an opinion letter. For the second time, the court remanded the case back to the Commission. Based on the court's remand order, the AHO conducted a second hearing on August 14, 2002. On October 14, 2002, the AHO conducted a second hearing and issued a recommended decision (Order Number 20). The recommended decision directed Value Line Company to pay an administrative civil penalty in the total amount of $85,500. Minute Order Number 02-33, was issued by the Commission on December 6, 2002, affirming, without modification the recommended decision (Order Number 20) entered on October 14, 2002.

On January 6, 2003, for the third time Value Line Company appealed the Commission's decision to the Circuit Court of Clark County. On February 11, 2005, Judge Switzer issued an order which upheld the Commission's Minute Order Number 02-33. To date, Value Line Company has not complied with APC&EC Minute Order Number 02-33. Throughout the appeal process, Value Line Company did not comply with other terms of the NOV, which included completion of Plan 1.

Site Description

Location: This site is located at 701 South 3rd Street in the city limits of Arkadelphia, Arkansas.

Population: The estimated population of Arkadelphia 10,910.

Setting: The site is currently owned/operated by Ouachita Baptist University, which uses the facility as maintenance storage. The property is located in a mixed industrial and residential area. There are several residences in close proximity to the facility.

Hydrology: The Value Line Company site lies within the physiographic province known as the Gulf Coastal Plain. The lithologic units in this area are primarily comprised of the Arkadelphia Marl, Quaternary Alluvium and the Nacatoch Sand. The primary hydrologic zones can be found in the Quaternary Alluvium and the Nacotach Sand. The Arkadelphia Marl is the youngest Cretaceous Age Formation in Arkansas and is not noted to yield water to wells. The regional dip and groundwater flow within these formations is southeasterly.

Aerial Photo: 701 South 3rd Street, Arkadelphia, Arkansas (2006).

Photo: Front of Building of Former Value Line Company on Third Street.

Waste and Volumes

ADEQ soil sampling indicated the areas of contamination include the hazardous waste storage areas.

Health Considerations

The health considerations are unknown. No risk evaluation has been performed at this site.

ADEQ Response Actions

This site is proposed to be included on the Site Priority List (SPL) for investigation and possibly remediation.

ADEQ Anticipated Future Activities

Future activities should include a site assessment to determine the current site conditions as well as whether there is a need for remedial activities. ADEQ will pursue the former owner and operator of the site if possible for compliance with APC&EC Minute Order Number 02-33, including completion of a Sampling and Analysis Plan (Plan 1). ADEQ will also contact the current property owner to determine what assessments have been conducted and the need for additional investigation by the current owner.

Site Contacts

Contact: Richard Healey (501) 682-0879

VALUE LINE COMPANY

STATE PRIORITY LIST SITE

1205 North 10th STREET
ARKADELPHIA, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118

EPA CERCLA ID No: AR0000000331
AFIN: 10-00234
County: Clark
Arkansas Senate District: 20
Arkansas House District: 26
US Congressional District: 04

Current Status

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On January 6, 2003, for the third time Value Line Company appealed the Commission's decision to the Circuit Court of Clark County. On February 11, 2005, Judge Switzer issued an order which upheld the Commission's Minute Order Number 02-33. To date, Value Line Company has not complied with APC&EC Minute Order Number 02-33. Throughout the appeal process, Value Line Company did not comply with other terms of the NOV, which included completion of Plan 1.

Site Description

Location: This site is located at 1205 North 10th Street in the city limits of Arkadelphia, Arkansas.

Population: The estimated population of Arkadelphia 10,910.

Setting: The site is currently abandoned. The property is in a mixed industrial and residential area. There are several residences in close proximity to the facility.

Hydrology: The Value Line Company site lies within the physiographic province known as the Gulf Coastal Plain. The lithologic units in this area are primarily comprised of the Arkadelphia Marl, Quaternary Alluvium and the Nacatoch Sand. The primary hydrologic zones can be

found in the Quaternary Alluvium and the Nacotach Sand. The Arkadelphia Marl is the youngest Cretaceous Age Formation in Arkansas and is not noted to yield water to wells. The regional dip and groundwater flow within these formations is southeasterly.

Aerial Photo: 1205 North 10th Street, Arkadelphia, Arkansas (2006).

Photo: Front of Building of Former Value Line Company on Tenth Street.

Waste and Volumes

ADEQ soil sampling indicated the areas of contamination include the hazardous waste storage areas.

Health Considerations

The health considerations are unknown. No risk evaluation has been performed at this site.

ADEQ Response Actions

This site is proposed to be included on the Site Priority List (SPL) for investigation and possibly remediation. This site is proposed to be included on the Site Priority List (SPL) for investigation and possibly remediation.

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Site Contacts

Contact:	Richard Healey	(501) 682-0879