EXHIBIT G:

SUMMARIES OF SITES PROPOSED FOR DELETION & ADDITION

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

ADEQ proposes to add the **Cedar Chemical Company** site to the National Priority List section of Regulation No. 30. On January 4, 2012, the Governor of Arkansas requested that Cedar Chemical Corporation be placed on the National Priority List (NPL) using Arkansas's ability to designate one site to be placed on the federal NPL by request pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980. On March 15, 2012 EPA in turn published a Federal Register notice proposing the addition of Cedar Chemical Company to the NPL at 40 CFR 300. The NPL listing for Cedar Chemical was finalized on September 15, 2012, and was published in the *Federal Register* on September 18, 2012 (77 FR 57503). After the site's addition to the NPL, ADEQ will act as the supporting agency and will assist EPA in addressing contamination at the site.

2. State Priority List Sites

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

ADEQ is proposing to delete five (5) 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.

A sixth site, Cedar Chemical Company, is proposed to be removed from the State Priority List and transferred to the National Priority List section of Regulation No. 30.

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 site summaries at Tabs 1 through 4 of this Attachment.

The sites proposed for delisting are:

(1) **Amity Lacquer, Paint, & Chemical Manufacturing Co.**, Amity, Clark County
(2) **Cedar Chemical Company,** Helena-West Helena, Phillips County *(transferred to the National Priority List)*
(3) **Hadco of Arkansas ONC**, Gillham, Sevier County
(4) **Jimelco**, Little Rock, Pulaski County
(5) **R&P Electroplating**, Fayetteville, Washington County
(6) **Swift Chemical Company Farm Property**, Rogers, Benton County

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

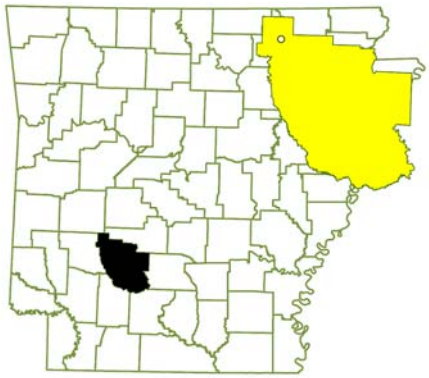
None.

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 .

Amity Lacquer, Paint and Chemical Company

STATE PRIORITY LIST SITE
AMITY, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: ARD983286337
EPA CERCLA ID No: N/A
AFIN: 10-00016
County: Clark
Arkansas Senate District: 26
Arkansas House District: 23
US Congressional District: 4

Current Status

In September 2005, the Arkansas Department of Environmental Quality (ADEQ) finalized a Remedial Action Decision Document (RADD) that required Amity to remediate the contaminated areas. The RADD represented ADEQ's decision regarding the implementation of the corrective action alternatives selected for the contaminated soil in the addendum to the Corrective Measure Study (CMS) dated October 29, 2004. Natural attenuation and long term monitoring of the contaminated ground water was chosen as a reliable alternative for groundwater at this site. The facility has been required to perform additional groundwater sampling to determine the level of reduction of the contaminants at the site through the natural attenuation process. This site is recommended to be removed from the State Priority List in 2013.

State Priority List History

The site is 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 investigation and remediation categories on December 7, 2001. The remedial action has taken place and the groundwater monitoring is complete at the site. This site is recommended to be removed from the State Priority List in 2013

Site Description

Location: The Amity site is located in Township 5 South, Range 22 West, Section 31, Clark County, Arkansas.

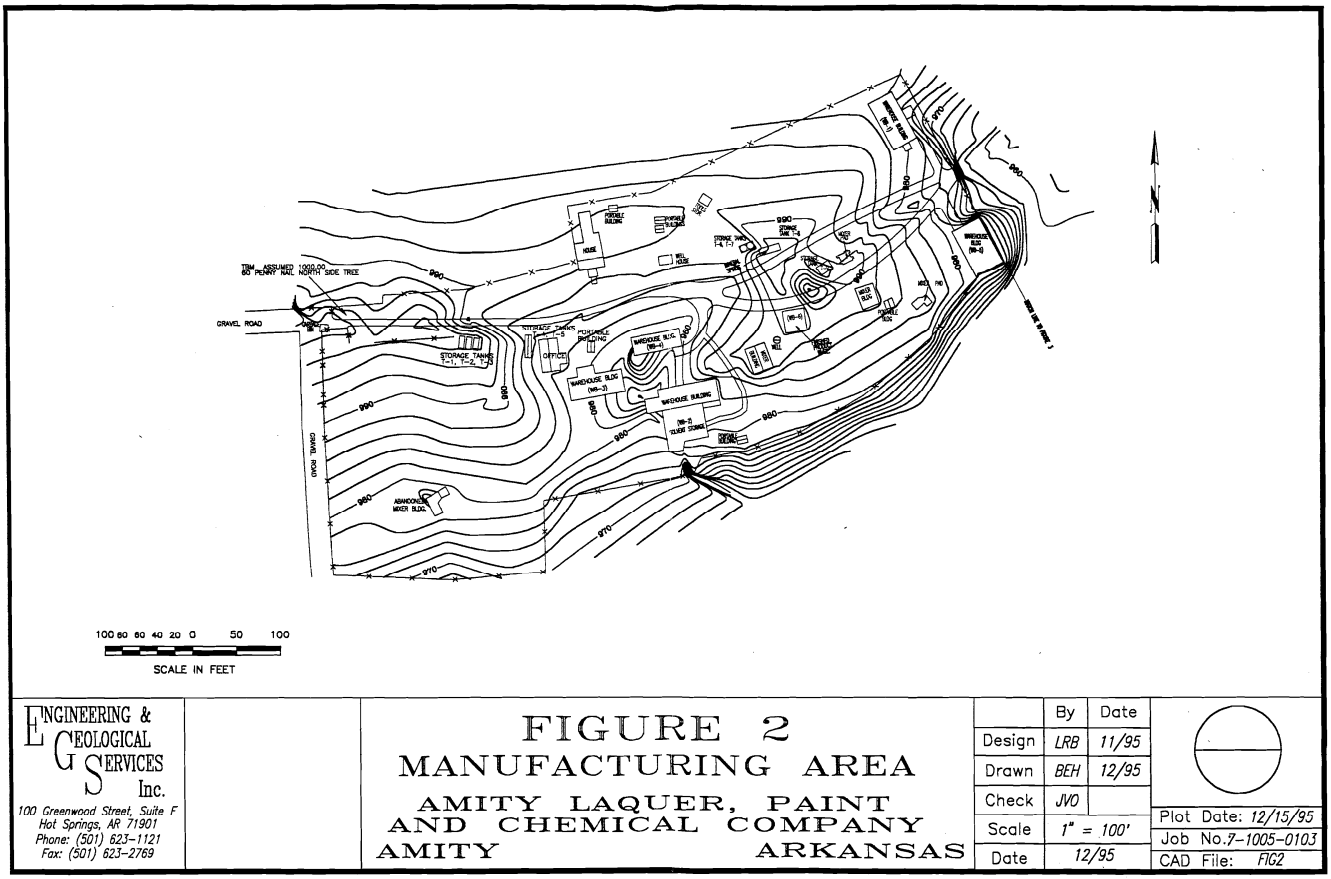
Population: About 800 residents live in the city of Amity.

Setting: The facility is located east-northeast of Amity, Arkansas, off State Highway 8, then north on an unnamed dirt road for approximately three (3) miles. The facility occupies a portion of the 120 acre site contiguous with the manufacturing plant.

Hydrology: The Amity site is located on the Athens Plateau, which is a belt about 15 miles wide that lies between the mountains of the Ouachita region on the north and the west Gulf Coastal Plain on the south. The Athens Plateau is dissected with narrow crooked valleys of southward flowing truck stream and by many east-west valleys of small tributary stream, which are 350 feet or less below the upland surface. The facility is characterized by surface elevations which range from 500 ft Mean Sea Level (MSL) to 565 ft.

Aerial Photo:

Location Diagram:



Waste and Volumes

Based on the proposed remedy outlined in the Remedial Action Decision Document (RADD), the east mixer building on the Amity property was demolished and removed and the debries were transported to a permitted off-site landfill for disposal. Soils beneath the mixer building and within the general vicinity were excavated and transported to a permitted hazardous waste landfill. Approximately 2,156 cubic yards of contaminated waste were excavated from this site. The contamination at the site originated from the manufacture of paints, lacquers, varnishes and related chemicals. Methyl Ethyl Ketone, Acetone and lead were primary chemicals of concern at the site.

Health Considerations

The remedial actions eliminated risks to human health and the environment. Any future risks at the site due to the ingestion of contaminated soils, surface water and groundwater have been addressed. The ground water will be monitored for a period of five (5) years.

ADEQ Response Actions

Amity was established in 1956 and continuously operated until it was shut down in early 1996 after declaring bankruptcy. The facility produced a wide range of paints, lacquers, and related products, including thinner and paint strippers.

On June 12, 2000, a Consent Administrative Order (CAO LIS 00-105) was signed by ADEQ and the Trustee of Bankruptcy Court for the Northern District of Texas. This CAO required Amity to identify all solid waste at the site and determine if it was hazardous waste, remove all hazardous waste, respond to the Facility Investigation (FI) work plan Notice of Deficiency (NOD), implement the FI, and perform a Corrective Measures Study (CMS).

The proposed remedy is natural attenuation of the contaminated groundwater and long term monitoring of the uppermost groundwater in the vicinity of the East Mixer building.

ADEQ Anticipated Future Activities

Amity submitted a Work Plan on July 8, 2009 providing detail regarding the monitoring of groundwater. The staff at ADEQ reviewed the work plan and conditionally approved the Work Plan on 9/1/2009. Based on the requirements of the RADD, the facility has been monitoring groundwater since 2009. Upon review of the final groundwater data, ADEQ issued a no further action letter on May 17, 2012 for this site. This site has been recommended for removal from the SPL during 2013.

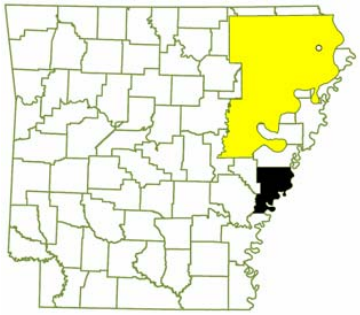
Site Contacts

Project Coordinator:	Mostafa Mehran	(501) 682-0837 mehran@adeq.state.ar.us
Information Repository:	Amity Public Library 309 West Thompson Street Amity, AR 71921	(501) 342-5822

Cedar Chemical Company

STATE PRIORITY LIST SITE
WEST HELENA, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA ID No: AR990660649
AFIN: 54-00068
County: Phillips
Arkansas Senate District: 16
Arkansas House District: 13
US Congressional District: 1

Current Status

In 2010, Quapaw LLC leased the property. Since then Quapaw has dismantled process units 2, 3, 4, and 6 and has sold or scrapped the equipment and building structures. Units 1 and 5 were retained for future use. Quapaw continues to clean up the site and provides site security and maintenance.

Unit 1 is operated by EnviroTech Industries for the production of peroxyacetic acid (PAA). PAA is stored in 300-gallon poly totes, loaded in trucks, and shipped to poultry companies to be used for chicken cleaning. Unit 5 will eventually undergo renovation to be used for chemical production.

The Governor of Arkansas has requested Cedar Chemical Corporation be placed on the National Priority List (NPL) using Arkansas's one state NPL site selection under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This nomination has the support of the ADEQ, local citizens, stakeholders and elected officials. The site was approved for addition to the NPL on September 15, 2012.

State Priority List History

Since operations began at the plant in the early 1970's, ADEQ has issued multiple consent administrative orders (CAOs) to prompt Cedar to comply with environmental regulations. Cedar Chemical filed for bankruptcy in March 2002 and plant operations were shut down. Unable to fulfill the obligations of the CAO, ADEQ placed the site on the State Priority List (SPL) of the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 30 in October 2002 for the purposes of investigation and remediation.

Site Description

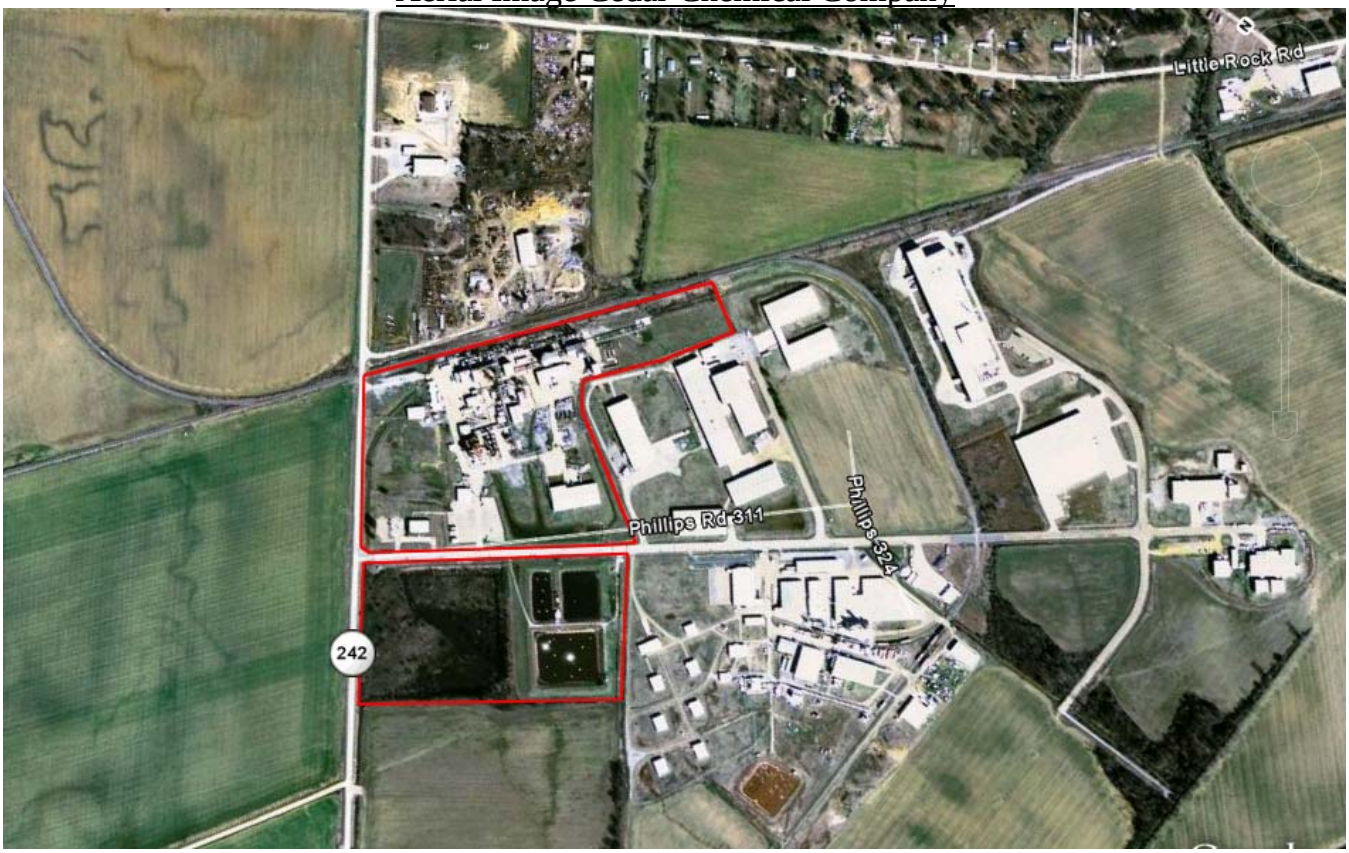
Location: The Facility is located just to the south of the city of Helena-West Helena, in Phillips County, Arkansas. The Facility consists of approximately 48 acres located within the Helena-West Helena Industrial Park, approximately 1.25 miles southwest of the intersection of U.S. Highway 49 and State Highway 242. The site address is 49 Phillips Road 311, Helena, Arkansas 74342.

Population: 2010 U.S. Census Bureau population estimate for Helena-West Helena: 12,282.

Setting: The Facility is bordered by farmland and other industrial park properties. State Highway 242 and a rail spur border its western and northern boundaries respectively. The onsite buildings on the Premises include an office complex, an R & D laboratory, a QA/QC Laboratory, various warehouse buildings, an employee changing station, truck scales, various process control rooms and Process Units 1 and 5. Other structures include three (3) wastewater treatment ponds no longer in service, and three (3) closed surface impoundments located between the manufacturing area and Highway 242.

Hydrology: The Site is bounded to the north by Caney Creek which flows generally to the west towards the Mississippi River. Surface water in the vicinity of Cedar Chemical drains to the southeast towards two unnamed tributaries which are flowing in a southwesterly direction.

Aerial Image Cedar Chemical Company



Waste and Volumes

Hazardous substances detected in soils at concentrations greater than risk-based screening criteria include Arsenic, Cadmium, Mercury, Aldrin, Dieldrin, Dinoseb, Heptachlor, Methoxychlor, Toxaphene, 3,4-Dichloroaniline, Propanil, Chloroform, 1,2-Dichloroethane, Methylene Chloride, and Pentachlorophenol.

Hazardous substances detected in groundwater at concentrations greater than risk-based screening criteria and/or Maximum Contaminant Levels (MCLs) include Arsenic, Barium, Cadmium, Chromium, Lead, 4,4'-DDT, Alpha BHC, Aniline, 4-Chloroaniline, Chlorobenzene, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, Chloroethane, 1,4-Dichlorobenzene, 2,6-Dinitrotoluene, 3,4-Dichloroaniline, 4Chlorozniline, Dinoseb, bis(2-Chloroethyl)ether, bis(2-Ethylhexyl) phthalate, 1,2-Dichloroethane, 4Methyl-2-Pentanone, 2Methylphenol, Acetone, Benzene, Chloroform, Vinyl Chloride, Methylene Chloride, Trichloroethene, 1,1,2Trichloroethane, 1,2-Dichloropropane, Bromodichloromethane, Bromoform, Dibromochloromethane, and Toluene.

In summary, the surface soils and subsurface soils are contaminated with pesticides, volatile organics, and heavy metals. The onsite surface water bodies and groundwater are contaminated with volatile organics and heavy metals. The sediments are contaminated with pesticides and heavy metals.

Eighty (80) Solid Waste Management Units (SWMUs) (including approx. 30 sumps and 10 drum/drum storage/drum crushing areas) have been identified onsite to date that are deemed areas of concern.

Health Considerations

Site investigations have concluded significant impacts to surface soils, subsurface soils, surface water and groundwater. The chemicals used onsite in the processes included volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides, and metals. These constituents have been detected in the respective media in concentrations greater than background. The levels detected are at concentrations that could continue to contribute to groundwater contamination and at levels which could pose an unacceptable risk to human health and/or the environment under various exposure scenarios.

ADEQ Response Actions

In October 2002, after Cedar filed for bankruptcy, ADEQ assumed control of the site. From 2002 until ADEQ leased the site to Quapaw LLC in 2010, ADEQ provided 24-hour site security, site maintenance, and maintained the on-site wastewater treatment plant with an operator to handle storm water runoff from the facility. Currently Quapaw provides security to the site.

In January 2003, USEPA Region 6 conducted a removal action and removed chemicals left at in tanks and containers. On March 22, 2007, ADEQ, pursuant to the authority of the Arkansas Remedial Action Trust Fund Act ("RATFA"). issued a Consent Administrative Order (CAO) LIS 07-027 to three primary responsible parties (PRPs):

- Tyco Safety Products-Ansul Incorporated, formerly known as Wormald US, Inc. (Ansul),
- Helena Chemical Company (Helena Chemical), and
- ExxonMobil Chemical Co., a division of ExxonMobil Corporation (ExxonMobil).

The CAO tasked the PRPs to conduct a site investigation and feasibility study. By December 2009, the PRPs had fulfilled the CAO obligations. ADEQ then prepared a draft Remedial Action Decision Document (RADD) in February 2010 which proposed remedies to address contaminated soil and groundwater. The Final RADD was published on June 3, 2010. ADEQ attempted to negotiate another CAO with the PRPs to implement the remedies outlined in the RADD, however an agreement could not be met.

ADEQ Anticipated Future Activities

On January 4, 2012, The Governor of Arkansas has requested Cedar Chemical Corporation be placed on the National Priority List (NPL) using Arkansas's one state NPL site selection under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). On March 15, 2012 EPA in turn proposed the addition of Cedar Chemical Corporation to the NPL. The NPL can be found in Title 40 Code of Federal Regulations 300 – National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR 300). The NPL listing for Cedar was approved on September 15, 2012, and is pending publication in the *Federal Register*. ADEQ will act as the support agency and will assist EPA in addressing contamination at the site.

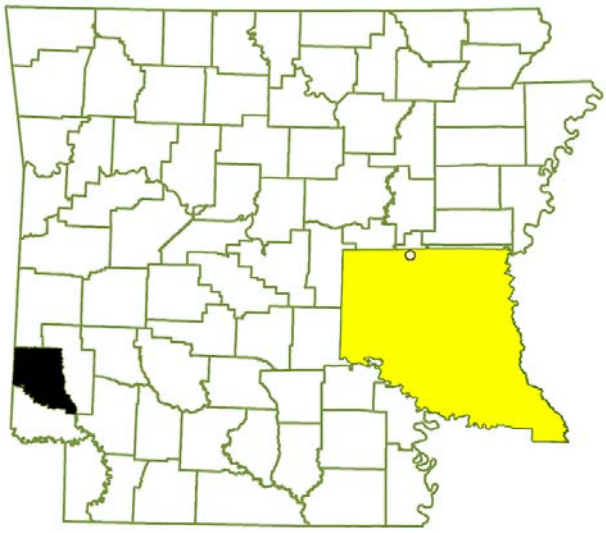
Site Contacts

Project Coordinator:	Jim Rigg	501-682-e0832 rigg@adeq.state.ar.us
Information Repository:	UAMS Area Health Education Centers Delta 1393 Highway 242 South Helena-West Helena, AR 72342	

HADCO OF ARKANSAS

STATE PRIORITY LIST SITE
GILLHAM, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: ARD021354493
EPA CERCLA ID No: Not Applicable
AFIN: 67-00078
County: Sevier County
Arkansas Senate District: 21
Arkansas House District: 21
US Congressional District: 4

Current Status

The Hadco property was 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.

The CSA Report for this site was approved in November 2006. A Public Notice of the Implementing Agreement entered by and between the Brownfields Program Participant and the ADEQ for the purpose of compliance with appropriate Arkansas Statutes governing the voluntary clean-up of the Hadco property was published in September 2007.

The CSA determined that a surface soil location near a former sump contained levels of metals exceeding residential standards.

Additional sampling was conducted by the ADEQ on February 9, 2011 at the contaminated areas on the Hadco site. The sampling data showed contamination of chromium was still present on site. After conducting a risk analysis on the sampling data, it was determined that the chromium on site needed to be delineated between hexavalent or trivalent.

FTN Associates, Inc. obtained additional samples on April 20, 2012 and concluded that all the chromium on the site is trivalent rather than hexavalent. Based on this data, the site now shows no unacceptable risk to human health, and has been recommended for deleting off the State Priority List (SPL).

Currently the site is being held by the State Land Office. The State Land Office has determined that any deed issued from the sale of the property will include language restricting the site to industrial use only.

State Priority List History

Hadco operated at the site from 1980 to 1992 as a machining and electroplating facility; much of their work involved the production of conventional ammunition components. The electroplating process involved using solutions of chromium, cadmium, and cyanide. Additionally, waste acids and plating solutions were stored throughout the site. A series of waste removal actions, environmental assessments, and sampling investigations were conducted by ADEQ, EPA Region 6, and the Arkansas Department of Health between 1992 and 2000. Based on these previous studies, ADEQ identified remaining concerns and added the site to the SPL in 2005. The CSA investigation targeted elevated metal concentrations in soil and pond sediment, and on building and equipment surfaces.

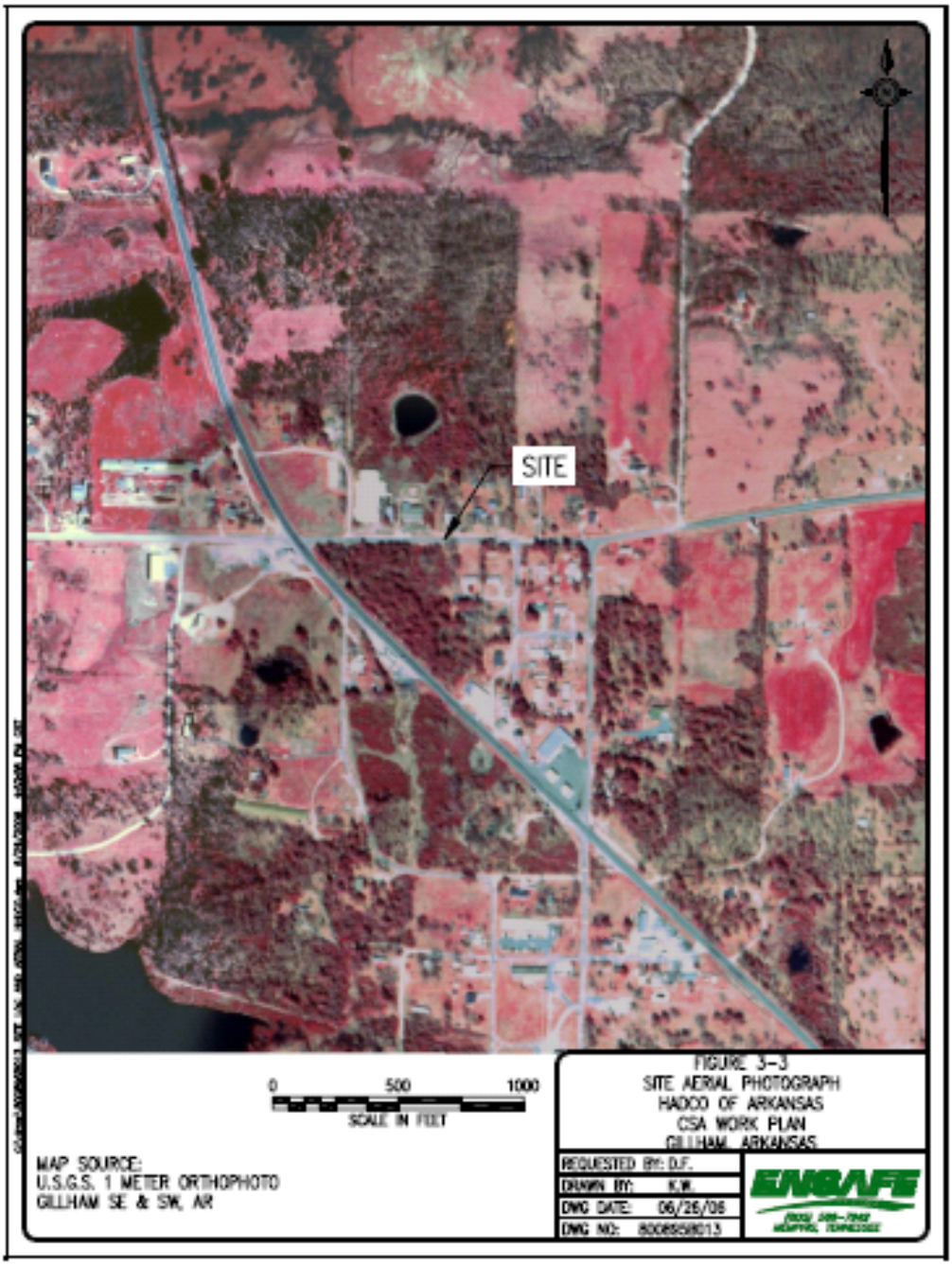
Site Description

Location: The 17-acre site is located at the corner of Tower Road and State Highway 71 on the north side of the small town of Gillham, Arkansas. The geographic coordinates are 34^{o} 10’ 16” north latitude and 94^{o} 19’ 02” west longitude.

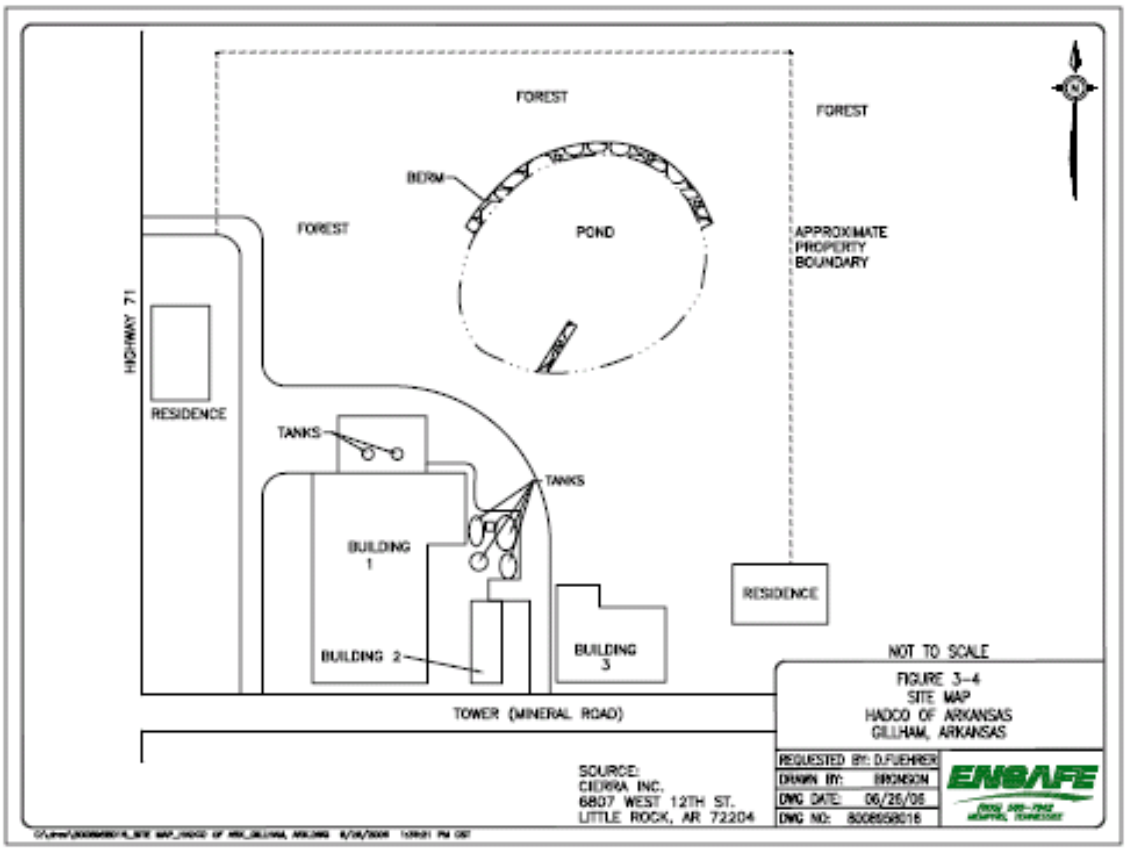
Population: Gillham has approximately 188 residents.

Setting: The site contains three steel frame buildings and ancillary tanks and equipment situated on both open and wooded land. The State of Arkansas Land Commissioner has owned the property since 1993, when the previous owner filed for bankruptcy and abandoned the operation. Light industrial, retail, and residential developments are located in Gillham, principally along Highway 71. The undeveloped land surrounding the site and the town is similar to the heavily wooded land found in the Ouachita National Forest to the north. The land is hilly with forested areas interspersed with agricultural fields, bedrock outcrops, and private residences, farms, and commercial developments. In particular, the forested land is home to an abundant wildlife population, including numerous species of birds.

Hydrology: The land surface is relatively flat across the southern portion of the property, and then slopes down to the north-northeast into a former cooling pond that is bermed around the sides. Surface water flows across the property to the north and into the pond, which feeds a spring and a creek that flows north into the Lower Little River watershed. A groundwater-bearing zone is developed at the top of and in weathered bedrock at depths of 3 to 17 feet below ground surface. Groundwater in this zone produces only small quantities of water to wells, and is not considered to be a useable aquifer.



Aerial Photo: Gillham, Arkansas



Site Diagram: Hadco Property

Waste and Volumes

The site has not been used since 1992. When abandoned, the production line vats were essentially in place at the site. During the three-phase removal action conducted by ADEQ and EPA between December 1992 and July 1993, wastes were segregated, sampled and disposed at permitted facilities. The removal and disposal of these materials mitigated immediate threats posed by these materials to human health and the environment.

Removed media included:

- 32,500 gallons of poisonous and corrosive waste
- 660 yards of Class I nonhazardous soil and debris
- 123 drums containing 24,805 pounds of solid and 3,570 gallons of liquid corrosive, oxidizing, and flammable wastes
- Various drums, totes, and tanks

Health Considerations

The CSA sampling results indicated a highly localized area, or "hot spot," of cadmium and chromium contamination near a former sump. A focused human-health risk evaluation of all chemicals of potential concern (COPCs) at the site was completed to determine the need for further action and/or any land use restrictions at the site.

The models used in the risk evaluation predict the lifetime cancer risks and noncarcinogenic Hazard Indices (HIs) for potential receptors exposed to site contamination. These models determined potential risks for exposure (via ingestion, dermal contact, or inhalation) using the maximum concentrations of all COPCs in soil including the elevated metals concentrations in the "hot spot." No unacceptable cancer risks were predicted for adult or child resident soil exposures; however, HIs indicating potential cumulative adverse health effects were predicted. No unacceptable cancer or noncancer risks were predicted for industrial/commercial worker soil exposure.

ADEQ Response Actions

The following provides a chronology and brief description of actions taken at the Hadco site:

- ADPC&E Sampling Event, November 1992 – Drum, tank, soil, and surface water samples showed high concentrations of plating metals in various media.
- ADPC&E Emergency Order and Request for Response, December 1992 – Required response actions by owner and requested the EPA provide assistance in mitigating health threats and removing wastes from site.
- EPA Emergency Removal Action, December 1992 to July 1993 – Removal and disposal of chemicals, containers, and impacted media.
- EPA Site Assessment, February 1994 – Soil, sediment, and water sample results for priority pollutant metals and cyanide below state and Federal action levels.

- EPA Focused Site Inspection, May 1995 – Site survey and analytical data generation to support a score under the Hazard Ranking System to determine if the site should be included on the National Priorities List.
- Superfund Site Strategy Recommendation, November 1995 – Designated the disposition of the site as No Further Remedial Action Planned and further investigation under Superfund not warranted.
- Sampling and Analysis Field Investigation, November 1997 – Property lender-initiated Phase II investigation conducted with ADPC&E review and comment; elevated chromium, cadmium, zinc, nickel, and cyanide detections.
- Additional sampling was conducted by the ADEQ on February 9, 2011 at the contaminated areas on the Hadco site.
- Contractor obtained additional samples to allow for complete characterization of chromium as hexavalent or trivalent form.

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 public sector entity, the State Land Office was eligible for such assistance and ADEQ initiated a Targeted Brownfields Assessment (TBA) for the Hadco site in 2005. TBAs are designed to help minimize the uncertainties of contamination often associated with brownfields. ADEQ arranged for a contractor to conduct a site visit and evaluate and present background information, data searches, and site worker interviews to satisfy the requirements of a Phase I Environmental Site Assessment. These activities began in June were concluded in December 2005. ADEQ subsequently secured a contractor to conduct the CSA activities of 2006. ADEQ has provided contractor oversight, reviewed plans and reports, and continues to assist the State Land Office in expediting the Hadco property redevelopment process.

ADEQ Anticipated Future Activities

The State Land Office intends to sell the site for industrial reuse. Any prospective purchaser will have the option of completing the Brownfields process by submitting a Property Development Plan. The ADEQ would then prepare a Property Development Decision Document. Upon completion of actions required by the Property Development Decision Document, the ADEQ would issue a Certificate of Completion for the Hadco site. This site is proposed for deletion from the SPL.

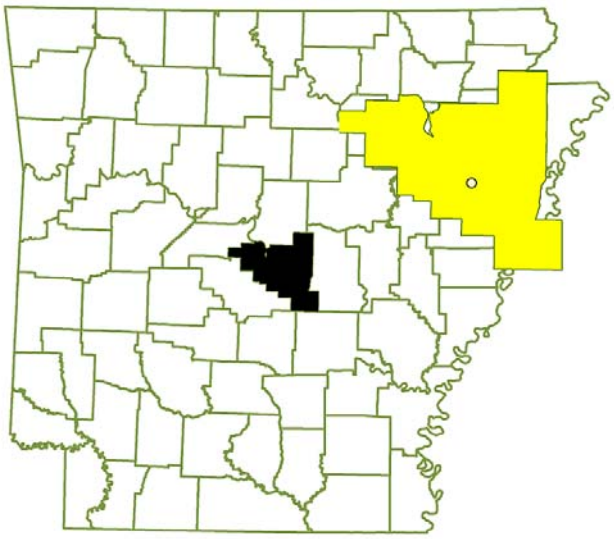
Site Contacts

Brownfields Coordinator:	Terry Sligh	(501) 682-0867
Project Coordinator:	Brett Baker	(501) 682-0858

JIMELCO, LITTLE ROCK

STATE PRIORITY LIST SITE
LITTLE ROCK, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: Not Assigned
EPA CERCLA ID No: ARD062144308
AFIN: 60-00642
County: Pulaski County
Arkansas Senate District: 32
Arkansas House District: 51
US Congressional District: 2

Current Status

Following the site's abandonment in 1993, ADEQ investigations determined that hazardous substances, particularly polychlorinated biphenyls (PCBs), presented a threat to the environment and human health. An emergency removal action was ordered and completed, and subsequent investigation findings were submitted to EPA Region 6 Superfund administrators. In January of 2001, the EPA Region 6 issued a Superfund Site Strategy Recommendation Form to state the decision of No Further Remedial Action Planned (NFRAP). Jimelco is now an Archived Site on the EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List. The Archive designation indicates the site has no further interest under the Federal Superfund Program based on available information.

The ADEQ contracted Ensafe, Inc. to evaluate the site 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. The CSA Report was completed in May 2009. A screening level risk assessment performed by ADEQ on the CSA Report results determined that soil and groundwater contamination at this site is below risk-based screening levels.

A Declaration of Restrictive Covenant was placed on the property on September 12, 2012 restricting the use of the site to industrial purposes. This site is proposed for deletion from the SPL.

State Priority List History

The Jimelco, Little Rock site was a transformer reclamation and recycling facility which ceased operations due to bankruptcy in early 1993. Before Jimelco operations began in 1987, the site operated under the name Jacksonville Scrap Metal and/or Benton Salvage. A Benton Salvage also once operated in the City of Benton; this site was subject to separate environmental investigations. The 1994 emergency removal and containment operations at the Jimelco, Little Rock site under the Emergency Response Fund mitigated the immediate dangers to the environment and public health, welfare, and safety. Additional investigation to confirm the extent to which hazardous substances may have migrated off-site and cleanup of any remaining on-site contaminants was required to eliminate potential hazards posed by the site. The Jimelco property was listed on the SPL effective March 17, 1995.

Site Description

Location: The 14.86-acre site is located at 3400 South Maple in the southwest portion of Little Rock, Arkansas. The geographic coordinates are 34^{o} 43' 17" north latitude and 92^{o} 18' 55" west longitude.

Population: Little Rock has approximately 183,133 residents.

Setting: The property is bordered on the east and west by industrial facilities, to the north by the Pulaski County Maintenance facility, residential areas, and the Missouri-Pacific Railroad tracks, and to the south by a wetland and woodlands.

Hydrology: The land gently slopes to the north. North of the site there is a topographic high and surface runoff flows from this high on to the site. The property is drained by a ditch to the west, which flows into Fourche Creek. The majority of the site is level with only minor depressions.

Aerial Photo: Jimelco Property, Little Rock, Arkansas

Waste and Volumes

Hazardous materials and/or wastes used and generated at the site during its operation included motor and hydraulic oil, emthalite (Fuller's earth), and PCB-containing oil and contaminated fluids. An undetermined quantity of transformers were also dismantled and improperly burned on the property. Sampling results indicated PCB and petroleum hydrocarbon contamination at the site.

Four primary contamination sources were identified during sampling activities, site inspections, and other data gathering activities:

- Main building secondary containment area containing 26 liquid holding tanks
- The former incinerator location
- Current incinerator stack
- Multiple transformers scattered throughout the property

Areas of soil staining, distressed vegetation, and discarded storage tanks and drums were also present throughout the property. Although no records of the quantity of wastes generated at the site are available, wastes removed during cleanup operations included:

- 33,045 gallons of waste oil removed from tanks
- 46,113 gallons of liquid drained from a former oil storage containment area collected during a period of heavy rainfall

Health Considerations

Although areas of soil and groundwater contamination were identified during the CSA process, a screening level risk assessment determined that the concentrations of chemicals of potential concern were below risk-based screening levels for industrial uses.

ADEQ Response Actions

The following provides a chronology and brief description of actions taken at the Jimelco site:

- Complaint Investigations, 1980-1989 – Responses to PCB handling and incineration violations.
- Site Inspections, 1990 – Actions regarding ongoing incinerator air permit violations.
- Site Investigation, July 1994 – Visual inspection and soil sample collection to document site conditions and PCB contamination following site abandonment.
- Emergency Order, August 1994 – Requirement issued that site be stabilized and secured; removal of all liquids from containment structures, vats, and tanks of compromised integrity.
- Liquid Removal Operations, 1994 and 1995 – Multiple liquid removal activities to remove liquid wastes from the site and prevent spills.
- Discharge Permit, April 1995 – One-time discharge permit obtained from Little Rock Wastewater Utility to pump the liquid contents of vat and tank containment structure to the city sewer via a carbon filter system.
- Cleanup Operations, July 1995 – Steam cleaning of areas with oily residue; discharge of noncontaminated liquid; sludge collection; trench construction and oily constituent collection via absorbent pads and socks.
- Expanded Site Inspection Narrative Report, January 1996 – Site survey and analytical data generation to support a score under the Hazard Ranking System to determine if the site should be included on the National Priorities List or is a candidate to receive a NFRAP decision.
- Superfund Site Strategy Recommendation, January 2001 – Designated the disposition of the site as NFRAP and further investigation under Superfund not warranted.
- Comprehensive Site Assessment (CSA), December 2008 through May 2009 – A CSA to determine the nature and extent of contamination was conducted for the site. The Final CSA Report was approved in May 2009.
- Declaration of Restrictive Covenant, August 2010 – Sent to former property owner for signature.

ADEQ Anticipated Future Activities

A Declaration of Restrictive Covenant was placed on the property on September 12, 2012 restricting the use of the site to industrial purposes. This site is proposed for deletion from the SPL.

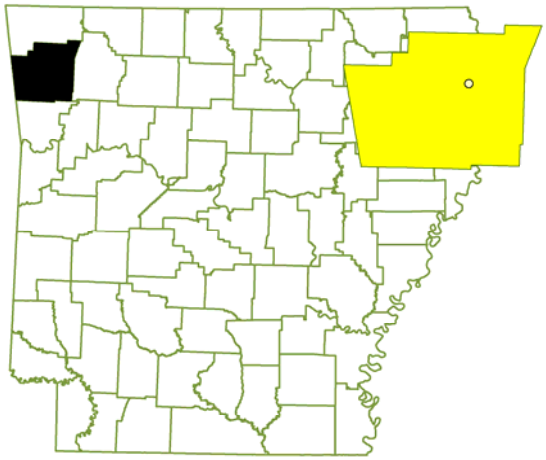
Site Contacts

Project Coordinator: Mostafa Mehran (501) 682-0853
mehran@adeq.state.ar.us

R & P ELECTROPLATING

STATE PRIORITY LIST SITE
FAYETTEVILLE, ARKANSAS

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118



EPA RCRA ID No: N/A
EPA CERCLA ID No: ARD051961829
AFIN: 72-00174
County: Washington
Arkansas Senate District: 7
Arkansas House District: 88
US Congressional District: 3

Current Status

Remediation of the site has been completed. To ensure that remediation was successful, post-remediation annual groundwater sampling of the remaining monitoring wells has been conducted. Two annual groundwater monitoring events have been conducted since remediation was completed in August 2010. Sample results from both sampling events showed that no contaminants were above the remedial action level. Based upon the results of the groundwater and surface water sampling, no further activities are warranted for this site. This site is proposed for deletion from the State Priority List.

State Priority List History

R & P Electroplating ceased operations in May 1997. The facility was vandalized on August 22, 1998 creating a release of an undetermined amount of various hazardous substances. On August 25, 1998, ADEQ issued a verbal Emergency Order of the Director for the facility owner to secure the site and retain an emergency services contractor. The facility owners failed to comply with the Order. An Emergency Order of the Director, LIS No. 98-124, was issued by ADEQ on August 27, 1998. ADEQ secured the response services of Haz-Mert, Inc. to proceed with all necessary response actions as detailed in the Order. On January 13, 1999 the Superfund Technical Assessment and Response Team (START) was tasked by the Region 6 United States Environmental Protection Agency (USEPA) to provide removal support at the site. Removal actions included waste stream classification; the sampling of drums, vats, various containers, trenches and sumps; and the removal of piping, conduit, wiring, air ducts, and hallway carpeting. Floors, trenches, and sumps were pressure washed and sealed with XYPEL concrete sealant. The site was listed on the State Priority List (SPL) in February of 2000 so state funds would be available for long term investigation or remediation.

Site Description

Location: The R & P Electroplating property is located at 2000 Pump Station Road in Fayetteville, Washington County, Arkansas. The geographic coordinates for the site are 36°02' 24" latitude North and 94°07' 56" longitude West.

Population: The population of the City of Fayetteville is 67,158.

Setting: The R & P Electroplating site is approximately 5.78 acres in size. The site is bounded by Pump Station Road to the south. A commercial building bounds the west side of the site. The West Fork of the White River and Combs Park are located adjacent to the site on its east side. A ball field bounds the site to the north. The site consisted of five interconnected buildings used to house the plating shop, warehouse, and offices. An 8-foot tall chain-link fence with barbed wire is located around the perimeter of the property. The property is heavily vegetated with overgrown weeds and grass.

Hydrology: The R&P site is located in the Boston Mountain Section of the Ozark Plateau Province. The Boston Mountain Section is a deeply dissected plateau region that generally ranges from 1,000 to more than 2,500 feet above sea level and is characterized by flattened ridges that rise from 300 to more than 1,000 feet above V-shaped valleys. Groundwater occurs at depths from 2 to 8 feet bgs in the unconsolidated clay and weathered shale. The general direction of groundwater flow is perpendicular to the contours in the direction of downward hydraulic gradient, thus groundwater generally flows east toward the West Fork of the White River (WFWR) except where affected by possible site features. Drainage on the north side of the property flows to a ditch immediately south of the baseball field then east toward the WFWR. Surface drainage across the southern side of the property is east toward the river. Overland flow and shallow drainages may allow contaminants in soil to migrate from the site to the WFWR. The southern structure of the facility is in the

floodplain but not in the floodway. There is a 6-ft base flood elevation drop at the concrete spillway southeast of the site, which changes flow conditions near the facility. The building reportedly flooded during heavy rains in April 2004.

Aerial Photo: R & P Electroplating, Fayetteville, Arkansas.

Waste and Volumes

During the remediation conducted from April 2010 to August 2010, wastes consisting primarily of construction and demolition debris were removed from the site and transported to authorized disposal facilities, including 21 tons of concrete floor slab material and fiberglass sump liners characterized as hazardous waste, and 6,276 gallons of sludge and sediments characterized as hazardous waste. 2,407 tons of non-hazardous concrete floor slab and trench sump material were transported off site for disposal at a construction and demolition landfill. 107 tons of non-hazardous scrap materials and abandoned shop equipment were transported off site for authorized reuse or recycling. 291 tons (161 cubic yards) of non-hazardous soils were transported off site for disposal at a construction and demolition landfill. A total of 217,790 gallons of stormwater and sump water were discharged to the city of Fayetteville's wastewater treatment system. Pre and post remediation verification sampling as well as other investigations related to the Remedial Action Construction Project were completed.

Health Considerations

Remedial activities during the spring and summer of 2010 removed any remaining contaminants from all media with the exception of groundwater. Post-remediation groundwater sampling events were conducted in March 2011 and February 2012. Both sampling events found that contaminants were below the remedial action level. It is assumed that the remediation and natural groundwater flushing from rain events have remediated the groundwater. The groundwater data shows that the R&P Property does not pose any human health exposure risk or ecological exposure risk.

ADEQ Response Actions

A review of the ADEQ files indicated a Consent Administrative Order (CAO) LIS No. 94-157 had been executed pertaining to a June 17, 1993, Compliance Evaluation Inspection (CEI). In addition, the ADEQ sent a number of letters (dated March 18, 1997, April 17, 1997, June 11, 1997, September 4, 1997, September 8, 1997, and December 17, 1997) to R&P, advising them of the May 21, 1996 and July 18, 1996, inspection findings, notice of non-compliance, offer of settlement, response to information requests, and revised offer of settlement. On or near the evening of August 22, 1998, the facility was vandalized and an undetermined amount of various hazardous substances were released. The local fire department responded and the ADEQ was notified on August 24, 1998. The release or threatened future release of hazardous substances potentially presented an imminent and substantial endangerment to public health, safety or welfare or to the environment, thus, on August 25, 1998, the ADEQ verbally issued an Emergency Order of the Director, followed by a written Order (LIS No. 98-124) dated August 27, 1998. The Emergency Order required an immediate response action to control the release of various hazardous substances at the site. R&P, however, failed to secure response services as required by the Emergency Order, so the ADEQ subsequently procured the services of an emergency response

contractor, Haz-MERT, Inc., to containerize and remove all hazardous substances associated with the facility and secure the facility. Subsequently, the CAO (LIS No. 98-124) was signed on November 10, 1998, identifying this action's potentially responsible parties, Mr. Frank C. Pummill, Mr. Arthur R. Pummill and R&P Electroplating, and addressing the issue of cost recovery. In 2003, the ADEQ completed a Comprehensive Site Assessment (CSA) on the property for the City of Fayetteville to determine what remedial actions are necessary to bring the property back in to productive use. A CSA was completed on the site in 2006 by ADEQ on behalf of the State Land Commissioner under the Brownfields program. Based on information supplied in the CSA Report and from other documents, ADEQ developed a draft RADD which detailed ADEQ's proposed actions for remediation of the site. The draft RADD was public noticed in the local newspaper on March 19, 2009. No comments were received in the thirty (30) day comment period. ADEQ then issued a Final RADD on June 4, 2009. ADEQ completed the remedial design process and bids were received for remedial action. Southern Environmental Management & Specialties (SEMS) was selected to be ADEQ's contractor to carry out the site improvements outlined in the ADEQ RADD. SEMS was issued a Notice to Proceed on March 23, 2010. On December 6, 2010, the Arkansas Building Authority awarded ADEQ a certificate of final completion as the project was deemed complete.

ADEQ Anticipated Future Activities

Based upon the results of the groundwater and surface water sampling, no further activities are warranted for this site. This site is proposed for deletion from the State Priority List.

Site Contacts

Project Coordinator:	Clay McDaniel	(501) 682-0836

Swift Chemical Company, Inc. (Farm Site)

STATE PRIORITY LIST SITE
ROGERS, ARKANSAS 72756

ADEQ
5301 Northshore Drive
North Little Rock, Arkansas 72118

EPA RCRA ID No: ARR000011122
EPA CERCLA ID No: N/A
AFIN: 04-00342
County: Benton
Arkansas Senate District: 8
Arkansas House District: 96
US Congressional District: 3

Current Status

Groundwater sampling conducted during October 2006 indicated concentrations of Trichloroethene (TCE) at the Swift Chemical Company, Inc. (Swift Chemical) facility exceeded the maximum contaminant level (MCL) for that chemical in drinking water. In an effort to further characterize the groundwater and contaminant conditions within the Mississippian-age Boone Formation, Swift Chemical sampled and installed three (3) additional "deep" RCRA groundwater monitoring wells at the site. The results obtained from this study were submitted to Arkansas Department of Environmental Quality (ADEQ) in the Amended Plan 1 Sampling and Analysis Report on August 30, 2007. This report was reviewed by the staff of ADEQ and a Notice of Deficiency (NOD) was issued on December 19, 2007. Swift submitted the Revised Plan 1 Report. Plan 1 Report was approved on February 13, 2009. Swift Chemical submitted the Plan 2 to ADEQ based on the requirements of the Consent Administrative Order (CAO) LIS 03-075 on April 23, 2009. The Plan 2 submitted by the facility included three (3) years semi-annual monitoring of groundwater at the site. Upon monitoring of groundwater, Swift Chemical was required to place a deed restriction on the property to prohibit the use of groundwater. The facility is recommended to be removed from the State Priority List.

State Priority List History

Swift Chemical Company, Inc. has been in business since 1975 manufacturing industrial cleaners and solvents. The 2001 South 1st Street location is known as the "farm property" and includes three warehouses and fifteen above ground storage tanks. 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 were initiated based on the provisions of 2003 CAO LIS 03-075. This site is recommended to be removed from the State Priority List.

Site Description

Location: The site is approximately located 0.1 miles south of the intersection of State Highway 94 and South 1st Street in the northwest corner of Section 19, Township 19 North, Range 29 West in an area of mixed commercial, industrial and residential development.

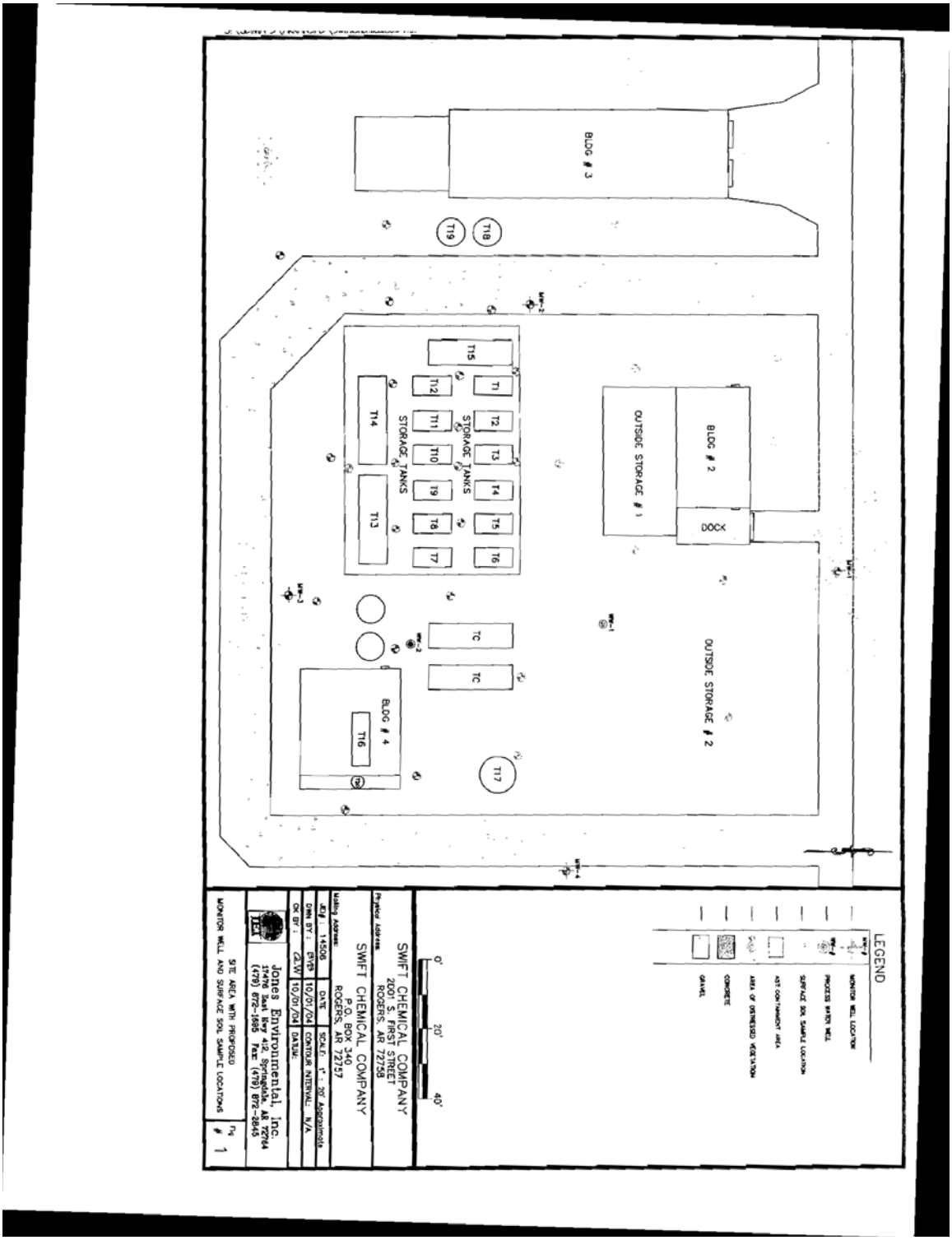
Population: About 38,829 residents live in the City of Rogers.

Setting: The Swift Chemical Farm Site is situated on approximately 2.75 acres and is located within the southeastern city limits of Rogers, Arkansas and within the southeastern section of Benton County, Arkansas. The facility includes three (3) warehouse buildings and an aboveground storage tank (AST).

Hydrology: The primary source of quality groundwater in the region is the siliceous-carbonate strata of the Ordovician Powell and Cotter Formation (Ozark Aquifer). Groundwater flow patterns and local hydraulic properties vary throughout these units due to the non-homogeneity of the aquifers. The topographic gradient and surface drainage of the area and site are toward the north, northeast and northwest, with surface elevations averaging 1,380' NGVD. Annual rainfall totals for the region average 44" per year.

Aerial Photo:

Site Diagram:



Waste and Volumes

No detectable concentrations of any volatile chemicals were detected in the soil samples. However, detectable concentrations of certain volatile chemical constituents were present in the groundwater at the site. These components are as follows: Trichloroethene (TCE), 2-Butanone also known as Methyl Ethyl Ketone (MEK), 1, 1 Dichloroethane (DCA) and Acetone.

Health Considerations

The site is under investigation at this time. The remediation at this site is pending final determination. However, due to TCE contamination above MCL at the site, ADEQ conducted a Johnson & Ettinger vapor intrusion model in May 2008 to evaluate health considerations utilizing conservative parameters. The results obtained indicated there were no unacceptable risks at the site.

ADEQ Response Actions

The investigation for the remediation of this site was initiated by the terms and provisions of a November 19, 2003 Consent Administrative order (CAO) LIS 03 – 075 entered into by Swift Chemical and ADEQ. The CAO required the facility to submit a Sampling and Analysis Plan designed to determine any hazardous substance present at this site. A total of four (4) RCRA monitoring wells were installed in October 2006. The groundwater sampling conducted during October 2006 indicated concentrations of Trichloroethene (TCE) at the Swift Chemical facility exceeded the maximum contaminant level (MCL) for that chemical in drinking water.

ADEQ required the facility to install three (3) deep wells at the site and perform further analysis. Swift Chemical submitted Amended Plan 1 discussing the results obtained. The Amended Plan 1 was reviewed and a NOD was issued on December 19, 2007. Revised Amended Plan 1 Report was submitted on October 2, 2008. The report was approved on February 13, 2009. Swift Chemical submitted Plan 2 for the remediation of groundwater on April 23, 2009. Plan 2 initiated a three (3) year semi-annual groundwater monitoring and reporting program. Plan 2 was approved on March 20, 2009. Swift submitted the first Semi-Annual Groundwater Monitoring Report on July 20, 2009. ADEQ staff reviewed the report and responded in a letter dated August 10, 2009. The facility has completed the task for the monitoring of groundwater.

ADEQ Anticipated Future Activities

The facility has placed a restrictive covenant on the property and submitted documentation to ADEQ. This site is recommended to be removed from the State Priority List.

Site Contacts

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