

# ADEQ

ARKANSAS  
Department of Environmental Quality

**MEMORANDUM OF REVIEW**  
**Reimbursement Request**  
**Petroleum Storage Tank Trust Fund**

From: Regulated Storage Tank Division Staff

Date: August 30, 2011

Subject: **Tyson Feed Mill AST**  
**3801 Johnson Road**  
**Springdale, AR**  
**ID #72001656 AFIN 72-00440 LAST #72-0154**

The Regulated Storage Tank Division received a request from the responsible party (RP) on August 9, 2011 for reimbursement (#5<sup>th</sup> & Final) for costs incurred during remediation of an AST site. The RP reported a diesel release, discovered during testing of an emergency fuel supply, from an aboveground storage tank at this site on November 10, 2005 (#72-0154). The name and address of the responsible party:

**Tyson Foods, Inc.**  
**Attn: Tony Tucker, Complex Manager**  
**P.O. Box 2020**  
**Springdale, Arkansas 72765**

The time covered by the application is from February 7, 2009 through December 16, 2010. Reimbursement is claimed for the following activities: preparation and submittal of an Additional Free Product Recovery Work Plan; implementation of MDPE (Mobile Dual-Phase Extraction) recovery events, post-MDPE well gauging events, preparation and submittal of a Free Product Recovery Report, preparation and submittal of a Monitor Well Closure Work Plan, monitor well closure activities, and preparation and submittal of a Well Decommissioning Report.

To date, a cumulative total of 218.29 vapor equivalent gallons of hydrocarbons have been recovered during the seven (7) completed events. A cumulative total of 10,500 gallons of petroleum contaminated groundwater have been recovered during the MDPE events at this facility.

The current claim included four (4) invoices from Pollution Management, Inc. (PMI), totaling **\$52,397.26**. Included in PMI's invoices were charges for: Enercon Services, Inc. (\$8,285.00), ASI (\$3,821.50), and Hugg & Hall Equipment (\$165.38).

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments)

It was determined that free product had been removed to the maximum extent practicable. **An NFA letter was sent to the RP on December 16, 2010. LAST Case #72-0154 is now considered closed.**

**RECOMMENDATION:**

The claimed cost of **\$52,397.26** was checked against documentation provided. **The following adjustments are recommended: \$10.73 plus \$2.15 profit (\$12.88) to remove tips not eligible for reimbursement and \$8.42 plus \$2.11 profit (\$10.53) for a meal not related to this site.** We have attached copies of the Cost Summary Sheet and all recap sheets provided by the claimant. The certification forms provided by the claimant were reviewed and are on file with the claim.

The staff refers for payment as follows:

<b>Claim filed - Form TF-1</b>	<b>\$52,397.26</b>
<b>Less: Adjustments</b>	<b>- 23.41</b>
<b>Amount Recommended for Payment</b>	<b><u>\$52,373.85</u></b>

It is recommended that the claim made by the RP be considered for payment in the amount of **\$52,373.85**.



Contractor: Pollution Management, Inc.

Facility ID#: 72001656

RA Log #:

Dates current costs incurred: 02/07/09 to 12/16/10

Request Date: 7/8/2011

**COST SUMMARY**

1. DIRECT PERSONNEL COST		Hours	Actual Cost	Totals
Principal/Managerial		1.50	79.34	
Professional/Technical		28.00	1,130.03	
Support		14.75	286.59	
<b>DIRECT PERSONNEL COST TOTAL:</b>		44.25 ✓		\$1,495.96 ✓
2. INDIRECT COSTS		Base	Rate	Actual Cost
Indirect Personnel		1,495.96	0.21	314.15 ✓
G & A Costs		1,495.96	1.20	1,795.15 ✓
<b>INDIRECT COSTS TOTAL:</b>		1.41 ✓		\$2,109.47 ✓
3. OTHER DIRECT COSTS			Actual Cost	
Equipment Rental			0.00	
Materials/Supplies			25.69	
Travel & Per Diem			260.00	
Laboratory			0.00	
Subcontracts			0.00	
Other			0.00	
<b>OTHER DIRECT COSTS TOTAL:</b>				\$285.69 ✓
<b>4. TOTAL ACTUAL COSTS</b>				\$3,891.11 ✓
<b>5. PROFIT TO CONSULTANT/CONTRACTOR</b>		25%		\$972.78 ✓
<b>6. TOTAL CLAIM AMOUNT</b>				\$4,863.90 ✓
A. Total Contract Billing to Date Including Above:				\$175,819.74
B. Amount Deductible:				(\$7,500.00)
C. Amount Previously Retained/Disallowed by RST:				(\$17.60)
D. Amount Previously Received:				(\$115,904.88)
E. Amount of this Request:				\$52,397.26

Contractor: Pollution Management, Inc.	
Facility ID#: 72001656	RA Log #:
Dates current costs incurred: 02/07/09 to 12/16/10	Request Date: 7/8/2011

**COST SUMMARY**

1. DIRECT PERSONNEL COST	Hours	Actual Cost	Totals	
Principal/Managerial	0.00	0.00		
Professional/Technical	156.50	5,144.40		
Support	27.00	395.14		
<b>DIRECT PERSONNEL COST TOTAL:</b>	183.50		\$5,539.54	
2. INDIRECT COSTS	Base	Rate	Actual Cost	
Indirect Personnel	5,539.54	0.26	1,440.28	
G & A Costs	5,539.54	1.26	6,979.82	
<b>INDIRECT COSTS TOTAL:</b>		1.52		\$8,420.04
3. OTHER DIRECT COSTS			Actual Cost	
Equipment Rental			12,183.69	
Materials/Supplies			181.68	
Travel & Per Diem			1,133.91	
Laboratory			0.00	
Subcontracts			12,152.27	
Other			0.00	
<b>OTHER DIRECT COSTS TOTAL:</b>				\$25,651.55
<b>4. TOTAL ACTUAL COSTS</b>				\$39,611.13
<b>5. PROFIT TO CONSULTANT/CONTRACTOR</b>	20%			\$7,922.23
<b>6. TOTAL CLAIM AMOUNT</b>	(Pg 2A & 2B)			\$47,533.36
A. Total Contract Billing to Date Including Above:				
B. Amount Deductible:				
C. Amount Previously Retained/Disallowed by RST:				
D. Amount Previously Received:				
E. Amount of this Request:				

Interim Request No.	5 & Final	Attachment 1
Contractor:	Pollution Management, Inc.	
Facility ID#:	72001656	RA Log #:
Dates current costs incurred:	02/07/09 to 12/16/10	Request Date: 10/5/2010

**Direct Personnel Cost Recap**

**Invoice # 15553**

Name	Title	Hours	Rate	Total
Danny Murdaugh	Principal	0.50	52.89	26.45
<b>Subtotal Principal/Managerial:</b>		<b>0.50</b>		<b>\$26.45</b>
Greg L. Wells	Prof. Geologist	4.50	38.46	173.07
<b>Subtotal Professional/Technical:</b>		<b>4.50</b>		<b>\$173.07</b>
Amanda E. Chaney	Clerical	2.00	15.38	30.76
Phyllis J.(Susie) Sexson	Clerical	10.25	15.87	162.70
Carolyn Roberts	Clerical	2.50	37.25	93.13
<b>Subtotal Support:</b>		<b>14.75</b>		<b>\$286.59</b>
<b>Total Personnel Cost - Invoice # 15553</b>		<b>19.75</b>		<b>\$486.11</b>

**Invoice # 15895**

Name	Title	Hours	Rate	Total
Danny Murdaugh	Principal	1.00	52.89	52.89
<b>Subtotal Principal/Managerial:</b>		<b>1.00</b>		<b>\$52.89</b>
Danny Murdaugh	Principal	1.00	52.89	52.89
Greg L. Wells	Prof. Geologist	23.50	38.47	904.06
<b>Subtotal Professional/Technical:</b>		<b>23.50</b> <i>24.50</i>		<b>\$956.95</b>
<b>Subtotal Support:</b>		<b>0.00</b>		<b>\$0.00</b>
<b>Total Personnel Cost - Invoice # 15895</b>		<b>24.50</b>		<b>\$1,009.85</b>

*25.50*

**Invoice # 16585**

Name	Title	Hours	Rate	Total
Greg L. Wells	Prof. Geologist	53.50	39.62	2,119.67
James D. Johnson	Field Technician	58.50	18.00	1,053.00
Joseph Morrow	Construction	1.00	20.00	20.00
Ronald W. Johnson	Field Technician	1.50	17.25	25.88
Patrick F. Gunter	Construction	28.50	16.00	456.00
Corky G. Wright	Construction	29.50	16.48	486.16
<b>Subtotal Professional/Technical:</b>		<b>114.50</b> <i>172.50</i>		<b>\$4,160.71</b>
Adam A. Richie	CADD/Draftsman	1.00	12.00	12.00
Sarah K. Santos	Clerical	20.50	14.43	295.82
Terri L. Hunt	Clerical	1.00	17.55	17.55
<b>Subtotal Support:</b>		<b>22.50</b> ✓		<b>\$325.37</b> ✓
<b>Total Personnel Cost - Invoice # 16585</b>		<b>137.00</b> <i>195.00</i>		<b>\$4,486.08</b> ✓

**Invoice # 17006**

Name	Title	Hours	Rate	Total
<b>Subtotal Principal/Managerial:</b>		<b>0.00</b>		<b>\$0.00</b>
Greg L. Wells	Prof. Geologist	11.00	39.62	435.82
James D. Johnson	Field Technician	17.50	18.00	315.00
Ronald W. Johnson	Field Technician	13.50	17.25	232.88
<b>Subtotal Professional/Technical:</b>		<b>42.00</b> ✓		<b>\$983.70</b> ✓
Samuel D. Newton	CADD/Draftsman	1.00	19.25	19.25
Sarah K. Santos	Clerical	3.50	14.43	50.51
<b>Subtotal Support:</b>		<b>4.50</b> ✓		<b>\$69.76</b> ✓
<b>Total Personnel Cost - Invoice # 17006</b>		<b>46.50</b> ✓		<b>\$1,053.46</b> ✓
<b>Total Personnel Recap - App # 5 &amp; Final</b>		<b>44.25</b> <i>286.75</i>		<b>\$7,035.49</b> ✓

Interim Request No.	5 & Final	Attachment 2
Contractor:	Pollution Management, Inc.	
Facility ID#:	72001656	RA Log #:
Dates current costs incurred: 02/07/09 to 12/16/10		Request Date: 07/08/11

**OTHER COST RECAP**

**Equipment Rental:**

Date	Invoice #	Vendor	Amount
<b>Invoice # 16585</b>			
		<b>Field Environmental Instrument</b>	
9/9/2010	1010613	FID/PID	\$348.31
<b>PMI Company Owned Equip</b>			
8/31/2010		08 Peterbilt SN 755669	\$825.00
9/1/2010		08 Peterbilt SN 755669	\$425.00
9/2/2010		08 Peterbilt SN 755669	\$175.00
8/10/2010		MDPE Mob/Demob	\$225.00
8/11/2010		MDPE	\$3,600.00
8/11/2010		MDPE Mob/Demob	\$90.00
8/12/2010		MDPE Mob/Demob	\$270.00
8/30/2010		MDPE Mob/Demob	\$810.00
8/31/2010		MDPE	\$3,600.00
8/31/2010		MDPE Mob/Demob	\$90.00
9/1/2010		MDPE Mob/Demob	\$360.00
8/11/2010		Kenworth 2007	\$700.00
9/20/2010		Kenworth 2007	\$500.00
<b>Invoice #17006</b>			
12/3/2010	30326926	Hugg & Hall Equipment Front End Loader/Backhoe With Trailer	\$165.38
<b>Total Equipment Rental</b>			<b>\$12,183.69</b> ✓

**Material & Supplies:**

	Date	Invoice #	Vendor	Amount
<b>Invoice # 15553</b>			<b>FedEx</b>	
	2/12/2009	908598414	Postage & Freight	\$25.69
<b>Invoice # 16585</b>			<b>FedEx</b>	
	7/8/2010	714939300	Postage & Freight	\$21.18
			<b>FedEx</b>	
	9/9/2010	721866702	Postage & Freight	\$41.60
			<b>Patrick Gunter</b>	
	9/2/2010	Exp Rep	Ice	\$1.33
			<b>FedEx</b>	
	10/14/2010	725800953	Postage & Freight	\$20.60
			<b>FedEx</b>	
	11/11/2010	728963039a	Postage & Freight	\$20.16
			<b>FedEx</b>	
	12/9/2010	732036223	Postage & Freight	\$20.44
			<b>James Johnson</b>	
	12/6/2010	Exp.	Concrete Mix/Topsoil	\$56.37
<b>Total Material &amp; Supplies</b>				<b>\$207.37</b>

**Travel & Per Diem:**

	Date	Invoice #	Vendor	Amount
			<b>PMI Company-owned Vehicles</b>	
<b>Invoice # 15553</b>	10/26/09	mileage	'65 miles @ \$.50 per mile	\$32.50
	10/26/09	mileage	'65 miles @ \$.50 per mile	\$32.50
<b>Invoice # 15895</b>	6/1/10	mileage	'390 miles @ \$.50 per mile	\$195.00
<b>Invoice # 16585</b>	8/10/10	mileage	'10 miles @ \$.50 per mile	\$5.00
	8/11/10	mileage	'10 miles @ \$.50 per mile	\$5.00
	8/23/10	mileage	'25 miles @ \$.50 per mile	\$12.50
	8/24/10	mileage	'25 miles @ \$.50 per mile	\$12.50
	9/28/10	mileage	'12 miles @ \$.50 per mile	\$6.00
	8/10/10	mileage	'40 miles @ \$.50 per mile	\$20.00
	8/12/10	mileage	'200 miles @ \$.50 per mile	\$100.00
	8/30/10	mileage	'220 miles @ \$.50 per mile	\$110.00
	8/31/10	mileage	'30 miles @ \$.50 per mile	\$15.00
	9/1/10	mileage	'220 miles @ \$.50 per mile	\$110.00
	8/11/10	mileage	'14 miles @ \$.50 per mile	\$7.00
	8/12/10	mileage	'14 miles @ \$.50 per mile	\$7.00
<b>Invoice # 17006</b>	12/2/10	mileage	'40 miles @ \$.50 per mile	\$20.00
	12/3/10	mileage	'10 miles @ \$.50 per mile	\$5.00
<b>Invoice # 16585</b>			<b>Corky Wright</b>	
	8/12/10	Exp Rept	Meals & Lodging	\$84.70



<b>Invoice # 16585</b>			<b>Patrick Gunter</b>	
	9/2/10	Exp Rept	Meals & Lodging	\$138.29
			<b>Robert E. Stout</b>	
	8/12/10	Exp Rept	Meals & Lodging	\$178.88
			<b>Ronald Heath Tucker</b>	
	9/7/10	Exp Rept	Meals & Lodging	\$297.04
<b>Total Travel &amp; Per Diem</b>				<b>\$1,393.91</b>
<b>Subcontracts:</b>				
	<b>Date</b>	<b>Invoice #</b>	<b>Vendor</b>	<b>Amount</b>
<b>Invoice #16585</b>			<b>ASI</b>	
	8/12/2010	LR9632-IN	Disposal - Lq 4,990 Gal	\$1,796.50
	9/2/2011	LR9683-IN	Disposal - Lq 1,000 gals	\$400.00
	10/1/2010	LR9741-IN	Disposal - Drop Charge	\$50.00
	10/1/2010	LR9741-IN	Disposal - Lq 4,500 gals	\$1,575.00
<b>Invoice #16585</b>			<b>Enercon Services, Inc</b>	
	8/25/2010	108575	Surfactant Injection	\$8,285.00
<b>Invoice #17006</b>			<b>Waste Management Eco-Vista</b>	
	12/16/2010	22356000877	Waste Disposal	\$45.77
<b>Total Subcontracts:</b>				<b>\$12,152.27</b>
<b>Total Other Direct Cost Recap :</b>				<b>\$25,937.24</b>

# Pollution Management, Inc.

3512 S. Shackleford Rd  
 Little Rock, AR 72205  
 Tel: 501-221-7122 Fax: 501-221-7775

Tyson Foods, Inc.  
 3801 Johnson Rd.  
 Springdale, AR 72765

**Invoice Number:** 15553  
**Date:** 5/13/10  
**Billing Manager:** Greg L. Wells  
**Client ID:** TYSN

Patrick Abshier

**Contract:** TYSN-3704:  
 TF - ESA/AST Rel, Springdale, AR

**Scope of work:** 3801 Johnson Rd  
 Springdale  
 AR 72765

TF- Environmental Site Assessment/AST Release  
 3801 Johnson Rd  
 Springdale, AR PO#4506139447  
 Facility ID#72001656

**Labor**

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
<b>Amanda E. Chaney</b>				
Prepare Status Report	4/1/09	1.00	\$15.38	\$15.38
Document Preparation	4/2/09	0.50	\$15.38	\$7.69
Retrieve Database Records	4/23/09	0.50	\$15.38	\$7.69
Employee Subtotal		2.00		30.76
<b>Carolyn H. Roberts</b>				
Prepare Reimbursement App	9/10/09	2.50	\$37.25	\$93.13
Employee Subtotal		2.50		93.13
<b>Daniel J. Murdaugh</b>				
Prepare Data/Work on Data	9/11/09	0.50	\$52.89	\$26.45
Employee Subtotal		0.50		26.45
<b>Greg L. Wells</b>				
Prepare Reimbursement App	3/23/09	0.50	\$38.46	\$19.23
Prepare Status Report	4/1/09	0.50	\$38.46	\$19.23
Prepare Reimbursement App	10/2/09	0.50	\$38.46	\$19.23
Review Project Data	10/23/09	0.50	\$38.46	\$19.23
Meetings - ADEQ	10/26/09	1.00	\$38.46	\$38.46
Meetings - ADEQ	10/27/09	1.50	\$38.46	\$57.69
Employee Subtotal		4.50		173.07
<b>Phyllis J. Sexson</b>				
Prepare Reimbursement App	4/1/09	1.00	\$15.87	\$15.87
Prepare Reimbursement App	4/13/09	5.25	\$15.87	\$83.32
Prepare Reimbursement App	4/14/09	0.50	\$15.87	\$7.94
Prepare Reimbursement App	4/23/09	1.50	\$15.87	\$23.81

# Pollution Management, Inc.

3512 S. Shackelford Rd

Little Rock, AR 72205-

Tel: 501-221-7122 Fax: 501-221-7775

Patrick Abshier  
Tyson Foods, Inc.  
3801 Johnson Rd.  
Springdale, AR 72765

**Invoice** 16585  
**Date:** 10/15/10  
**Billing** Greg L. Wells  
**Client ID:** TYSN  
**PO#** 4507344125  
**Received PO#:** 12/14/10

**Contract:** TYSN-3704:  
TF - ESA/AST Rel, Springdale, AR

TF- Tyson Feed Mill  
Environmental Site Assessment/AST Release  
3801 Johnson Rd  
Springdale, AR  
Facility ID#72001656  
List #72-0154

## Labor

### Employee/Activity

Date

Units

Rate

Amount

#### Adam A. Ritchie

Prepare Report	Task 4 - Review MDPE data	8/19/10	0.50	\$12.00	\$6.00
Prepare Report	Reviewed Data	9/21/10	0.50	\$12.00	\$6.00
Employee Subtotal			1.00		12.00

#### Corky G. Wright

Field Services		8/11/10	14.00	\$16.48	\$230.72
Field Services	Disposal	8/12/10	5.50	\$16.48	\$90.64
Field Services		9/20/10	10.00	\$16.48	\$164.80
Employee Subtotal			29.50		486.16

#### Greg L. Wells

Professional/Technical Service	Preparing work plan documents. Task 1. ✓	6/28/10	6.00 ✓	\$39.62	\$237.72
Professional/Technical Service	Prepare work plan documents. Task 1. ✓	6/29/10	3.00 ✓	\$39.62	\$118.86
Professional/Technical Service	Prepare work plan documents. Task 1. ✓	6/30/10	4.50 ✓	\$39.62	\$178.29
Professional/Technical Service	Task 1 - Complete/distribute FPRWP ✓	7/1/10	6.00 ✓	\$39.62	\$237.72
Coordinate Site Operations	Task 2 - Coordinate/schedule bench ✓ scale sampling for surfactant vendor.	7/27/10	2.00 ✓	\$39.62	\$79.24
Coordinate Site Operations	Task 2 - Coordinate sample delivery to ✓ vendor in OKC.	7/29/10	0.50 ✓	\$39.62	\$19.81
Field Services	Task 2 - On-site supervision of 16-hour ✓ MDPE and aquifer dewatering activities.	8/11/10	1.50 ✓	\$39.62	\$59.43
Coordinate Site Operations	Task 2 - On-site coordination ✓ /supervision of surfactant injection vendor and related activities.	8/12/10	6.00 ✓	\$39.62	\$237.72
Field Services	Task 2 - Coordinate site activities. ✓	8/13/10	2.00 ✓	\$39.62	\$79.24
Prepare Report	Task 4 - Draft report outline. ✓	8/16/10	2.00 ✓	\$39.62	\$79.24
Prepare Report	Task 4 - Review vendor report and draft ✓ report documents.	8/24/10	3.00 ✓	\$39.62	\$118.86
Prepare Report	Prepare report documents.	8/25/10	1.50 ✓	\$39.62	\$59.43
Prepare Report	Task 2 - Coordinate/schedule MDPE ✓ Event #2 for post-surfactant removal.	8/27/10	0.50 ✓	\$39.62	\$19.81

Patrick Abshier  
 Tyson Foods, Inc.  
 3801 Johnson Rd.  
 Springdale, AR 72765

**Invoice** 16585  
**Date:** 10/15/10  
**Billing** Greg L. Wells  
**Client ID:** TYSN  
**PO#** 4507344125  
**Received PO#:** 12/14/10

**Contract:** TYSN-3704:  
 TF - ESA/AST Rel, Springdale, AR

Prepare Report	Task 4 -Compile data and draft report documents.	9/24/10	2.50 ✓	\$39.62	\$99.05
Prepare Report	Task 4 - Draft FP Recovery Report Documents.	9/27/10	6.00 ✓	\$39.62	\$237.72
Prepare Report	Task 4 -Complete/distribute FP Recovery Report.	9/28/10	6.50 ✓	\$39.62	\$257.53
	Employee Subtotal		<u>53.50 ✓</u>		<u>2,119.67 ✓</u>
<b>✓ James D. Johnson</b>					
Field Services	Task 2 - collect PSH/water samples from MW's and deliver to Oklahoma City, OK	7/30/10	11.00 ✓	\$18.00	\$198.00
Field Services	Task 2 - schedule MDPE event/tanker for fluids	8/2/10	2.00 ✓	\$18.00	\$36.00
Field Services	Task 2 - travel to site, gauge MW's, setup headers, stingers and hoses.	8/10/10	3.00 ✓	\$18.00	\$54.00
Field Services	Task 2 - Collect MDPE data, gauge	8/11/10	17.50 ✓	\$18.00	\$315.00
Field Services	Task 2 - Reschedule 16 hour MDPE	8/13/10	0.50 ✓	\$18.00	\$9.00
Field Services	Task 2 -Gauge MW's and related	8/30/10	2.50 ✓	\$18.00	\$45.00
Field Services	Task 2 - Collect MDPE data	8/31/10	17.00 ✓	\$18.00	\$306.00
Field Services	Task 2 - post gauging of MW's / related activities	9/1/10	2.50 ✓	\$18.00	\$45.00
Field Services	Task 2 -gauge MW's	9/14/10	2.50 ✓	\$18.00	\$45.00
	Employee Subtotal		<u>58.50 ✓</u>		<u>1,053.00 ✓</u>
<b>Joseph Morrow</b>					
Coordinate Site Operations		8/10/10	1.00 ✓	\$20.00	\$20.00
	Employee Subtotal		<u>1.00</u>		<u>20.00</u>
<b>Patrick F. Gunter</b>					
Field Services		8/31/10	16.50	\$16.00	\$264.00
Field Services		9/1/10	8.50	\$16.00	\$136.00
Field Services		9/2/10	3.50	\$16.00	\$56.00
	Employee Subtotal		<u>28.50 ✓</u>		<u>456.00 ✓</u>
<b>Ronald W. Johnson</b>					
Field Services	Assisted in opening and gauging all MW's	9/28/10	1.50	\$17.25	\$25.88
	Employee Subtotal		<u>1.50</u>		<u>25.88</u>
<b>Sarah K. Santos</b>					
Document Preparation		7/1/10	3.00	\$14.43	\$43.29
Document Preparation		8/19/10	1.00	\$14.43	\$14.43
Document Preparation		8/20/10	3.00	\$14.43	\$43.29
Document Preparation		9/1/10	2.00	\$14.43	\$28.86

Patrick Abshier  
 Tyson Foods, Inc.  
 3801 Johnson Rd.  
 Springdale, AR 72765

**Invoice** 16585  
**Date:** 10/15/10  
**Billing** Greg L. Wells  
**Client ID:** TYSN  
**PO#** 4507344125  
**Received PO#:** 12/14/10

**Contract:** TYSN-3704:  
 TF - ESA/AST Rel, Springdale, AR

<b>Robert E. Stout</b>					
Meals & Lodging	ExpReptRS8/12/10	8/12/10	1.00	178.88	178.88 ✓
<b>Ronald Heath Tucker</b>					
Meals & Lodging	ExpReptRT090710	9/7/10	1.00	297.04	297.04 ✓
	Reimbursable Subtotal				13,217.83 ✓
<b>PMI Equip</b>					
✓ <b>Patrick F. Gunter</b>					
08 Peterbilt SN755669		8/31/10	16.50 ✓	50.00	825.00
08 Peterbilt SN755669		9/1/10	8.50 ✓	50.00	425.00
08 Peterbilt SN755669		9/2/10	3.50 ✓	50.00	175.00
✓ <b>James D. Johnson</b>					
07 Chevrolet 2500		8/10/10	10.00 ✓	0.50	5.00
07 Chevrolet 2500		8/11/10	10.00 ✓	0.50	5.00
07 Chevrolet 2500		8/23/10	25.00 ✓	0.50	12.50
07 Chevrolet 2500		8/24/10	25.00 ✓	0.50	12.50
07 Chevrolet 2500		9/28/10	12.00 ✓	0.50	6.00
✓ <b>Robert E. Stout</b>					
Pickup GMC Diesel Whi		8/10/10	40.00 ✓	0.50	20.00
✓ <b>Ronald H. Tucker</b>					
MDPE Mob/Demob		8/10/10	2.50 ✓	90.00	225.00
MDPE		8/11/10	16.00 ✓	225.00	3,600.00
MDPE Mob/Demob		8/11/10	1.00 ✓	90.00	90.00
Pickup GMC Diesel Whi		8/12/10	200.00 ✓	0.50	100.00
MDPE Mob/Demob		8/12/10	3.00 ✓	90.00	270.00
Pickup Chev Diesel Gr		8/30/10	220.00 ✓	0.50	110.00
MDPE Mob/Demob		8/30/10	9.00 ✓	90.00	810.00
Pickup Chev Diesel Gr		8/31/10	30.00 ✓	0.50	15.00
MDPE		8/31/10	16.00 ✓	225.00	3,600.00
MDPE Mob/Demob		8/31/10	1.00 ✓	90.00	90.00
Pickup Chev Diesel Gr		9/1/10	220.00 ✓	0.50	110.00
MDPE Mob/Demob		9/1/10	4.00 ✓	90.00	360.00
✓ <b>Greg L. Wells</b>					
098 Chev Silver SN138		8/11/10	14.00 ✓	0.50	7.00
098 Chev Silver SN138		8/12/10	14.00 ✓	0.50	7.00
✓ <b>Corky G. Wright</b>					
Kenworth 2007		8/11/10	14.00 ✓	50.00	700.00
Kenworth 2007		9/20/10	10.00 ✓	50.00	500.00
	PMI Equip Subtotal				12,080.00 ✓
	Item Subtotal				36,602.75 ✓
	Profit				7,320.55
	<b>Amount Due This Invoice</b>				<b>\$43,923.30</b> ✓

*This invoice is due upon receipt*

# Pollution Management, Inc.

3512 S. Shackleford Rd  
 Little Rock, AR 72205-  
 Tel: 501-221-7122 Fax: 501-221-7775

Tyson Foods, Inc.  
 3801 Johnson Rd.  
 Springdale, AR 72765

**Invoice Number:** 17006  
**Date:** 12/28/10  
**Billing Manager:** Greg L. Wells  
**Client ID:** TYSN

Patrick Abshier:

**Contract:** TYSN-3704:  
 TF - ESA/AST Rel, Springdale, AR

TF- Tyson Feed Mill  
 Environmental Site Assessment/AST Release  
 3801 Johnson Rd  
 Springdale, AR  
 Facility ID#72001656  
 Lust #72-0154

**Labor**

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
✓ <b>Greg L. Wells</b>					
Document Preparation	Drafting work plan for site closure.	11/2/10	3.00 ✓	\$39.62	\$118.86
	Task 1.				
Document Preparation	Complete/distribute WP for MW decommissioning. Task 1.	11/3/10	3.00 ✓	\$39.62	\$118.86
Coordinate Site Operations	Coordinate/schedule MW decommissioning field activities. Task 2.	12/1/10	1.00 ✓	\$39.62	\$39.62
Prepare Report	Complete/distribute MW decommissioning report. Task 4.	12/6/10	4.00 ✓	\$39.62	\$158.48
	Employee Subtotal		11.00 ✓		435.82 ✓
✓ <b>James D. Johnson</b>					
Field Services	TASK 2 - prep equipment and supplies for field activities	11/30/10	2.00 ✓	\$18.00	\$36.00 ✓
Field Services	TASK 3 - dispose of debris generated during plugging of MW's to landfill	12/2/10	13.50 ✓	\$18.00	\$243.00 ✓
Field Services	TASK 2 - return rental backhoe to rental company.	12/3/10	2.00 ✓	\$18.00	\$36.00
	Employee Subtotal		17.50 ✓		315.00 ✓
✓ <b>Ronald W. Johnson</b>					
Field Services	Task 3 assisted in disposal of waste materials to the landfill	12/2/10	13.50 ✓	\$17.25	\$232.88 ✓
	Employee Subtotal		13.50		232.88
<b>Samuel D. Newton</b>					
Drafting		12/3/10	1.00	\$19.25	\$19.25
	Employee Subtotal		1.00		19.25
<b>Sarah K. Santos</b>					
Document Preparation		11/3/10	2.00	\$14.43	\$28.86 ✓
Document Preparation		12/6/10	1.50	\$14.43	\$21.65 ✓
	Employee Subtotal		3.50		50.51 ✓
	Labor Subtotal		46.50 ✓		1,053.46

Tyson Foods, Inc.  
 3801 Johnson Rd.  
 Springdale, AR 72765

Patrick Abshier

**Contract:** TYSN-3704:  
 TF - ESA/AST Rel, Springdale, AR

**Invoice Number:** 17006

**Date:** 12/28/10

**Billing Manager:** Greg L. Wells

**Client ID:** TYSN

TF- Tyson Feed Mill  
 Environmental Site Assessment/AST Release  
 3801 Johnson Rd  
 Springdale, AR  
 Facility ID#72001656  
 Lust #72-0154

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
			Overhead	1,601.20
			<b>Direct Labor Total:</b>	<b>2,654.66</b> ✓

**Reimbursable**

**FedEx**

Postage & Freight	7-258-00953	10/14/10	1.00	20.60	20.60
FedEx Chgs (Sept/Oct 2010)					
Postage & Freight	7-289-63039a	11/11/10	1.00	20.16	20.16
FedEx Shipping Charges (10/11-11/8/10)					
Postage & Freight	7-320-36223	12/9/10	1.00	20.44	20.44
FedEx Shipping Charges (11/9-12/6/10)					

**Hugg and Hall Equipment**

Equipment Rental	30326926	12/3/10	1.00	165.38	165.38
Front End Loader/Backhoe w/trailer (12/2-12/3/10)					

**James Johnson**

Materials	ExpReptJJ12/6/10	12/6/10	1.00	56.37	56.37
Concrete Mix/Topsoil					

**Waste Management Eco-Vista** ✓

Waste Disposal - Landfill	0022356-00087	12/16/10	1.00	45.77	45.77
-7					
12/2/10. Misc. Debris Disposal (Concrete, PVC)					

Reimbursable Subtotal 328.72 ✓

**PMI Equip**

**James D. Johnson**

07 Chevrolet 2500		12/2/10	40.00	0.50	20.00
07 Chevrolet 2500		12/3/10	10.00	0.50	5.00

PMI Equip Subtotal 25.00 ✓

Item Subtotal 3,008.38 ✓

Profit 601.68

**Amount Due This Invoice** **\$3,610.06** ✓

*This invoice is due upon receipt*

# ADEQ

ARKANSAS  
Department of Environmental Quality

## MEMORANDUM

TO : *Onsite*  
Wanda Paes, Manager  
Arkansas Petroleum Storage Tanks Trust Fund

THROUGH : Daniel Clanton, P.E., Technical Branch Manager *D 8/11/11*  
Regulated Storage Tanks Division

FROM : Gerald Delavan, P.G., Geologist Supervisor *GLD 08-11-11*  
Technical Branch, RST Division

DATE : October 11, 2009

SUBJECT : **Review of the 5<sup>th</sup> (Final) Trust Fund Reimbursement Application for Tyson Foods, Inc. /Tyson Feed Mill**  
**3801 Johnson Road**  
**Springdale, AR 72765**  
**Facility ID #72001656      LAST #72-0154      AFIN 72-00440**

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*The following information provided is in response to your Memo to me, dated August 10, 2011.*

The RST Division has received the 5<sup>th</sup> and Final Trust Fund Reimbursement Application (TFRA) for ground water sampling and free product recovery activities at the Tyson Feed Mill located in Springdale, AR. The 5<sup>th</sup> TFRA was submitted to the RST Division by Pollution Management, Inc. (PMI) on August 09, 2011. The time period for this 5<sup>th</sup> TFRA is from February 07, 2009 thru December 16, 2010.

**The total requested reimbursement amount is this application request is \$52,397.26.**

This 5<sup>th</sup> Trust Fund Reimbursement Application covers costs associated with four separate invoices prepared by PMI (#15553, #15895, #16585 & #17006) for the following activities associated with the LAST release at the Tyson Feed Mill:

1. Preparation and submittal of *Additional Free Product Recovery WP and Cost Estimate* with the recommended surfactant flush; collection of ground water samples for bench scale testing prior to performing surfactant flush 07-10-10.
2. Conducted two (2) MDPE surfactant flush/free product recovery events with associated fluid disposal costs on 08-11-10 and 08-31-10.



3. Conducted post MDPE well gauging event 08-11-10. Conducted post MDPE well gauging event 08-31-10.
4. Preparation and submittal of *Free Product Recovery Report* 09-28-10.
5. Preparation and submittal of *Monitor Well Closure WP and Cost Estimate* 09-28-10.
6. Conducted monitor well closure activities 12-02-10.
7. Preparation and submittal of a *Well Decommissioning Report* 12-06-10.
8. RST's *NFA Letter* was sent out on 12-16-10.

### **Comments on Tyson Foods, Inc. Trust Fund Reimbursement Application #5**

I have reviewed the work performed by each PMI employee and the corresponding number of hours for that work. All work and the total hours noted on the invoices tracks favorably with what is known about the work performed on the given dates. The applicant's Project Summary provided with Trust Fund Reimbursement Application #5 reasonably reflects my understanding of the case. Estimated project costs were consistent with the actual project costs submitted in this reimbursement application. I did not identify any unapproved costs or activities nor did I identify any activities that may violate Regulation #12. This is the final TFRA request for this release.

### **Case Status**

Free product removal operations utilizing surfactant flush and 2 MDPE events were successful in removing the remaining diesel fuel at the Tyson Feed Mill in Johnson. RST staff determined free product has been removed to the "maximum extent practicable". Therefore, case was closed and an NFA Letter was sent out on 12-16-10.

## PROJECT STATUS REPORT

Tyson Feed Mill  
3801 Johnson Road  
Springdale, Arkansas  
Facility ID #72001756 LUST Case #72-0154 (AST)

Period of February 7, 2009 through December 16, 2010

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The following is a summary of the release history and the reimbursable activities completed by PMI on behalf of Tyson Foods, Inc. The site activities were conducted following the discovery of a diesel fuel release at the active aboveground storage tank (AST) facility located at 3801 Johnson Road in Springdale, Arkansas.

### Release Background:

Leaking Underground Storage Tank (LUST) Case #72-0154 was initiated on November 10, 2005 after standing free product diesel was discovered on the ground surface at the Feed Mill property. The release was discovered during startup and testing of an emergency diesel fuel supply for a process boiler system after that system failed to start and operate normally.

During subsequent investigation, fresh diesel fuel was discovered pooling on the grass-covered ground surface between the AST containment area and the feed mill building. The affected AST system was immediately shut down and taken out of service upon discovery of the release. Tyson personnel estimated the amount of lost fuel inventory to be approximately 250 gallons.

The apparent point of release was determined to be at a location where the underground fuel system piping bisected a high-pressure, underground natural gas pipeline operated by Arkansas Western Gas Company (AWG). Due to the degree of damage to the underground piping, Tyson Foods elected to permanently close the underground piping associated with the ASTs and boiler system.

The portions of the product lines which were located beneath the grass ground surface were excavated and removed, and the portions located beneath the concrete drive area were drained, capped and permanently closed in place.

Based on the limited data generated during the initial response and site check activities, the ADEQ developed a preliminary assessment profile for the facility. Due to concerns regarding the potential for groundwater impact in the regional groundwater aquifer, the ADEQ requested a site investigation with the goal of determining the level and extent of potential groundwater contamination.

In a February 13, 2006 correspondence to Tyson Foods, Inc., the ADEQ requested submittal of a work plan and cost estimate for a limited site investigation at the facility. A work plan for the site investigation activities was prepared and submitted to the ADEQ by PMI on March 24, 2006. Agency approval of the work plan was granted on September 25, 2006, with submittal of a final report on, or before December 13, 2006.

In accordance with the ADEQ-approved work plan and cost estimate, PMI conducted the limited site investigation field activities during the period of October 23, 2006 through December 8, 2006. The field activities included drilling and continuous sampling of five (5) soil borings and installation of five (5) RCRA groundwater monitoring wells, conducting an area receptor survey, site mapping and handling/disposal of investigation-derived wastes. A final report for the site investigation was prepared and submitted to ADEQ on December 13, 2006.

Based on the findings of the 2006 investigation, PMI recommended that additional site investigation be conducted. PMI also recommended that efforts to remove free-product be initiated and that additional wells be placed into the upper sections of the bedrock interval in an effort to achieve full delineation of the groundwater hydrocarbon contamination in the aquifer.

On January 2, 2007, the ADEQ issued a request for a work plan and cost estimate for conducting additional site investigation activities. The ADEQ requested periodic groundwater gauging of the five (5) existing monitor wells, and additional groundwater sampling as the next step in the investigation prior to considering free-product recovery. The ADEQ also requested surface water sampling in nearby Sandy Creek in an effort to determine if any impact had occurred to that ecological receptor.

A work plan for the additional site investigation was submitted to the ADEQ on January 16, 2007. Approval for the work plan was granted on March 13, 2007, with final reporting requested on, or before August 13, 2007. PMI prepared and submitted an Additional Site Investigation Report on August 2, 2007.

On October 5, 2007, ADEQ requested a work plan and cost estimate for additional site assessment activities to include installation of four (4) additional monitoring wells, gauging and sampling of entire resulting well network, and conducting three (3) mobile dual-phase extraction events as interim free-product recovery. Submittal of the work plan was requested on, or before November 26, 2007.

On November 20, 2007, PMI prepared and submitted a work plan and cost estimate for additional site assessment activities which included conducting a maximum of three (3) MDPE free product recovery events. ADEQ approved the work plan on February 6, 2008, and requested submittal of the first free product recovery report via electronic mail by March 26, 2008. Submittal of the Site Assessment Report was requested on, or before June 9, 2008.

The first (1<sup>st</sup>) free-product recovery event was conducted on February 25, 2008. MDPE Report #1 was submitted to the ADEQ on March 10, 2008. The second (2<sup>nd</sup>) free-product recovery event was conducted on April 8, 2008. MDPE Report #2 was submitted to the ADEQ on April 23, 2008.

Due to the relatively low hydrocarbon recovery rates during the two (2) initial events, the ADEQ requested suspension of the free product recovery operations. It was decided at that time to schedule a post-MDPE groundwater sampling event to be completed approximately 45 days after the second (2<sup>nd</sup>) event and following submittal of the additional site assessment report.

The field activities for the additional site assessment were conducted during the period of February 26 through March 18, 2008, and included drilling and installation of five (5) additional monitoring wells (MW-6 through MW-10), creating a network of ten (10) permanent wells.

PMI prepared and submitted an Additional Site Assessment Report on May 29, 2008. Based on the findings of the additional site assessment, it appeared that free product had not migrated off the subject property. Free product measurements indicated that hydrocarbon thickness doubled in MW-2, but remained stable in MW-4.

Significant levels of free product diesel were observed in MW-2 and MW-4 during secondary gauging events conducted on March 28, 2008 and May 20, 2008. A measured total of 0.42' of free product diesel was present in MW-2 and 0.90' in MW-4 on March 28, 2008.

A post-MDPE groundwater sampling and analysis event was conducted on May 20, 2008. PMI field technicians reported measurable free product in MW-1, MW-2 and MW-4 during the May 20, 2008, gauging event. A maximum free product thickness of 1.05' was observed in MW-2 on that date. The results of the May 20, 2008 groundwater sampling and analysis event were provided to the ADEQ in the context of a standalone Groundwater Sampling and Analysis Report on June 20, 2008.

Based on the conditions observed during the May 20, 2008 groundwater sampling and analysis activities, the ADEQ requested efforts to recover additional diesel free-product. On July 11, 2008, the ADEQ requested a work plan and cost estimate for additional free-product (NAPL) recovery. Submittal of the work plan was requested on, or before August 30, 2008.

A work plan for free-product recovery was submitted to the ADEQ on August 19, 2008, which proposed at least three (3) additional recovery events. Approval for the work plan was granted on November 2, 2008, with final reporting requested on, or before February 15, 2009.

The third (3<sup>rd</sup>) free-product recovery event was conducted on November 20, 2008. Post-MDPE gauging activities were conducted on December 1, 2008. MDPE-NAPL Recovery Report #3 was submitted to the ADEQ on December 5, 2008.

The fourth (4<sup>th</sup>) free-product recovery event was conducted on December 20, 2008. Post-MDPE gauging activities were conducted on December 30, 2008. MDPE-LNAPL Recovery Report #4 was submitted to the ADEQ on January 6, 2009.

The fifth (5<sup>th</sup>) free-product recovery event was conducted on January 22, 2009. Post-MDPE gauging activities were conducted on February 5, 2009. MDPE-LNAPL Recovery Report #5 was submitted to the ADEQ on February 6, 2009.

A cumulative total of 913.98 pounds, or 148.61 gallons of hydrocarbons and a cumulative total of 7,395 gallons of fluids were recovered during the five (5) completed MDPE events at this facility.

#### Current Reimbursable Activities:

The previous assessments did not identify any apparent human health or ecological receptors associated with the release. Based on a review of the available site assessment data, the ADEQ completed an "Exposure Assessment" document dated May 4, 2010. In the absence of any confirmed receptors or exposure risks, the ADEQ recommended corrective action "to control the source of regulated substance contamination to *the maximum extent practicable*" in order to prevent further spread of contaminants" (40 CFR 280.64)<sup>1</sup>.

In correspondence dated May 7, 2010, the ADEQ requested preparation and submittal of a work plan and cost estimate for free product recovery activities. Submittal of a work plan was originally requested on or before June 10, 2010. Based on meetings and discussions with RTSD technical staff, the work plan submittal date was subsequently modified and extended to July 12, 2010.

A work plan and cost estimate for free product recovery was prepared and submitted on July 1, 2010. Agency approval of the work plan was granted on July 20, 2010, with submittal of a final report requested on or before September 30, 2010.

In an effort to achieve the remedial goal recommended by the ADEQ and as discussed during a project technical scoping meeting, free product recovery and source control was conducted via high-vacuum extraction and passive application of chemical surfactants. Attainment of the remedial goal of "free product recovery to the maximum extent practicable" was to be verified by obtaining post-remedial groundwater gauging measurements.

The free product recovery operations included utilizing a vacuum truck to effect draw-down of the water table prior to passive application of liquid chemical surfactants. The surfactant flush was followed by a secondary high-vacuum recovery event to remove residual hydrocarbons and surfactants. Based on a review of subcontractor proposals, PMI contracted Enercon Services, Inc. to provide technical expertise and surfactant injection services for the project.

A PMI technician collected representative samples of free product and groundwater from the target monitoring wells on July 30, 2010. The samples were hand-delivered to the vendor offices in Oklahoma City, Oklahoma for bench scale analytical testing and design. The samples were analyzed by the vendor in order to select the optimal concentrations and types of surfactant solutions to be used at the site. The vendor bench scale testing was completed during the first week of August, 2010.

The initial MDPE recovery event was conducted on August 11, 2010 prior to injection of the selected surfactant solutions. The continuous, 16-hour vacuum recovery event utilized the existing monitoring well network as points of extraction. The purpose of the initial extraction event was to recover diesel free product and to drawdown the water table prior to injection of the chemical surfactants on the following day.

Prior to, and after the initial MDPE recovery event, fluid levels in all wells were measured using an electronic interface probe instrument to determine depths to water and relative free product thicknesses. Trace levels (0.04') of product were measured in one (1) well prior to the August 11, 2010 MDPE event (MW-5).

PMI utilized a Super King-Vac truck and a series of manifolded hoses to connect and extract from each of the ten (10) groundwater monitoring wells. A TVA-1000 Flame Ionization Detector (FID) instrument was used to record total organic vapor measurements in the vacuum truck air exhaust stream, and an air velocity meter was used to measure corresponding air flow rates in cubic feet per minute (cfm).

The August 11, 2010 MDPE event commenced at 6:15 a.m. and was concluded at 10:15 p.m. A maximum exhaust vapor concentration of 40,000 ppmv was observed during the first ½ hour of the recovery event, and vapor concentrations declined steadily and normally throughout the remainder of the event.

A vapor-equivalent total of 326.19 pounds, or 53.04 gallons of hydrocarbons were recovered during the August 11, 2010 MDPE event. Approximately 5,000 gallons of contaminated groundwater were recovered and removed to permitted disposal.

Following the August 11, 2010 MDPE and water table drawdown efforts, injection of the liquid chemical surfactants was implemented during the period of August 12-13, 2010. Vendor crews mobilized to the site and constructed a network of valve-controlled PVC surface piping which extended to each of the target monitoring wells. Seven (7) monitoring wells were targeted for passive injection of the surfactant solutions (MW-1, MW-2, MW-4, MW-5, MW-8, MW-9 and MW-10).

The vendor indicated that in excess of 500 gallons of surfactants were successfully injected into each targeted well over a two (2) day period under normal atmospheric conditions. Following an eighteen (18) day period of in-situ surfactant dispersion, a secondary high-vacuum MDPE recovery event was scheduled and conducted on August 31, 2010.

The second 16-hour vacuum recovery again utilized each of the ten (10) existing monitoring wells as points of extraction. A goal of the secondary extraction event was to recover emulsified diesel free product and the chemical surfactants.

Fluid levels in all wells were measured using an electronic interface probe instrument to determine depths to water and relative free product thicknesses. Trace levels of diesel were observed in MW-1 and MW-5 prior to the event (0.12' and 0.05', respectively).

The post-surfactant injection MDPE event commenced at 6:30 a.m. on August 31, 2010, and was concluded 10:30 p.m. on that same date. Hydrocarbon vapor levels in the vacuum exhaust stream were notably lower than those observed prior to the surfactant injection. A maximum exhaust vapor concentration of 8,050 ppmv was observed at the beginning of the event. Vapor concentrations declined steadily throughout the remainder of the event to 1,240 ppmv at 10:30 p.m. Trace levels of diesel were again observed in MW-1 and MW-5 following the event (0.03' and 0.09', respectively).

A vapor-equivalent total of 102.34 pounds, or 16.64 gallons of hydrocarbons were recovered during the August 31, 2010 post-surfactant MDPE event. Approximately 5,500 gallons of petroleum-contaminated groundwater were recovered and removed to permitted disposal.

To date, a cumulative total of 218.29 vapor-equivalent gallons of diesel-range hydrocarbons have been recovered during seven (7) MDPE recovery events.

A total of two (2) post-surfactant injection groundwater gauging events were conducted in order to measure groundwater and free product levels following the free product recovery activities. The first post-remedial gauging event was conducted on September 14, 2010. *No measurable free product* was present in any of the monitoring wells on that date. A second, post-surfactant gauging event was conducted on September 28, 2010. Again, *no measurable free product* was present in any wells.

During the two (2) MDPE recovery events completed on August 11, 2010 and August 31, 2010, a total of 10,500 gallons of petroleum-contaminated groundwater and surfactants were recovered. The recovered waste fluids were pumped from the vacuum truck into waiting tanker trucks as the wastes accumulated, or was stored temporarily in a PMI yard tank in Springdale, Arkansas, prior to removal and disposal. The recovered fluids were manifested as non-hazardous, special wastes and transported in bulk to the ASI hydrocarbon recycling/reuse facility located in Little Rock, Arkansas for permitted disposal.

A "Free Product Recovery Report" was prepared and submitted to the ADEQ on September 28, 2010. Following review of that report, the ADEQ determined that the primary project goal of free product recovery "to the maximum extent practicable" was successfully achieved. In an October 28, 2010 correspondence, the ADEQ requested submittal of a work plan and cost estimate for decommissioning all existing groundwater monitoring wells prior to final case closure. Submittal of a work plan was requested on or before November 30, 2010.

A work plan and cost estimate for monitoring well decommissioning was prepared and submitted to the ADEQ on November 3, 2010. The agency approved the work plan on November 22, 2010, and requested submittal of a final report documenting the well closure activities on or before December 22, 2010.

A team of PMI technicians mobilized to the site and conducted the well decommissioning activities on December 2, 2010. A total of ten (10) RCRA groundwater monitoring wells were previously installed during the site assessment process (MW-1 through MW-10). All of the wells were located in unpaved areas.

The wells were decommissioned in accordance with the Arkansas Water Well Construction Commission Rules and Regulations AWWCC: 096.00, Section 5.8.3, Plugging in Consolidated Formations, 2007. All wells were located on the facility property and averaged approximately 29.2' in depth. Based on the measured depths of the wells, it is estimated that a total of 292 linear feet of well bores were plugged and abandoned.

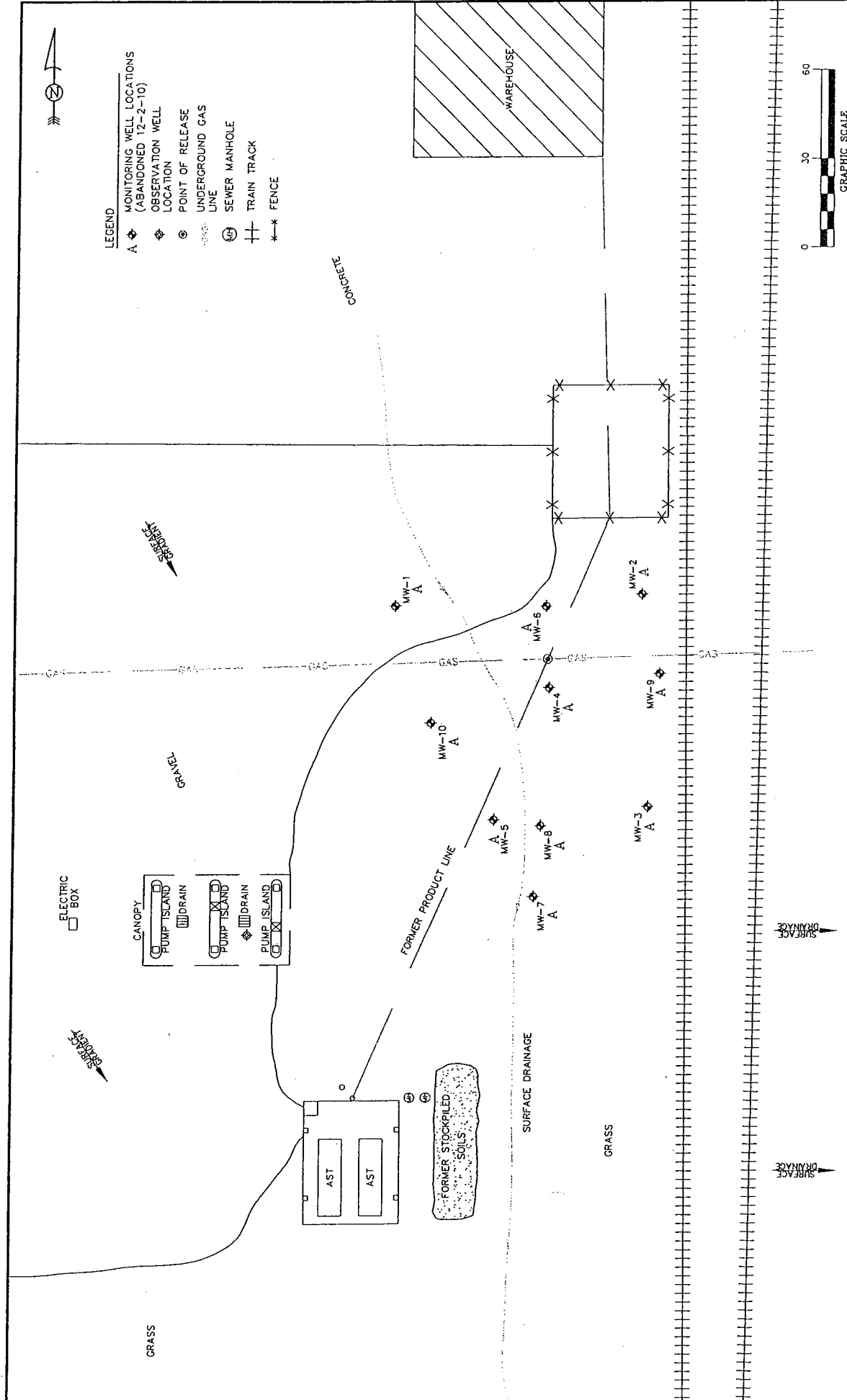
The wells were decommissioned and plugged by a team of PMI technicians using a small backhoe excavator and hand tools. PMI technicians removed the 8" diameter steel surface covers and base rings for the monitoring wells, and the PVC well casings were successfully extracted and removed from each well. All well bores were filled to within approximately 6" of the ground surface with hand-mixed Portland cement. The remaining well bores were capped with top soil to match the existing grades.


Solid waste materials such as well covers, casing remnants and broken concrete generated during the well abandonment process were transported and disposed as Class 4 construction debris at the Waste Management Eco-Vista landfill facility in Tontitown, Arkansas on December 2, 2010. These final site activities should effectively complete the corrective actions for LAST Case #72-0154.

In summary, the current request for reimbursement includes the following project-related activities:

- Development and submittal of a technical work plan and cost estimate for completing additional free-product recovery per **Task 1** of that document (completed 07/01/10).
- Conduct vendor groundwater bench scale testing per work plan **Task 2** (completed 07/28/10).
- Conduct two (2) surfactant flush/free-product recovery (MDPE) events and fluids disposal per work plan **Task 2 and 3** (completed 08/11/10 and 08/31/10).
- Conduct post-gauging for 08/11/10 event per work plan **Task 2** (completed 09/14/10).
- Conduct post-gauging for 08/31/10 per work plan **Task 2** (completed 09/28/10).
- Preparation and submittal of a Free Product Recovery Report per work plan **Task 4** (completed 09/28/10).
- Preparation and submittal of work plan and cost estimate for monitoring well decommissioning per work plan **Task 1** (completed 11/03/10).
- Conduct monitoring well decommissioning activities and waste disposal per work plan **Tasks 2 and 3** (completed 12/02/10).
- Preparation and submittal of a Monitoring Well Decommissioning Report per work plan **Task 4** (completed 12/06/10).

ADEQ issued a Notice of LAST Case Closure on December 16, 2010, which made the determination that "No Further Action" will be required for the above ground storage tank release at Tyson Feed Mill. This will be the final request for reimbursement for this project.



 <b>POLLUTION MANAGEMENT INC.</b> 17476 HIGHWAY 412 EAST SPRINGDALE, ARKANSAS 72764 (479) 750-7131 fax (479) 750-7134	SUBMITTED BY J. MITCHELL DRAWN S. NEWTON CHECKED G. WELLS	DATE DEC. 3, 2010 JOB NUM TYSN-3704 FILE NAME TYSN3704SP	SCALE: SEE GRAPHIC	TYSON FEED MILL 3801 JOHNSON ROAD SPRINGDALE, ARKANSAS FACILITY ID #72001656 LUST CASE #72-0154	GENERAL SITE PLAN w/FORMER MW LOCATIONS	DRAWING NUMBER <b>1</b>
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