



TETRA TECH

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SITE: American Drum + Pallet
BREAK: 2.1
OTHER: _____

July 19, 2007

Mr. Steve Spurlin
On-Scene Coordinator (OSC)
U.S. Environmental Protection Agency (EPA), Region 4
109 South Highland Avenue, B13
Jackson, Tennessee 38301

**Subject: Emergency Response Activities
American Drum and Pallet
Memphis, Shelby County, Tennessee
EPA Contract No. EP-W-05-054
TDD No. TTEMI-05-001-0040**

Dear Mr. Spurlin,

The Tetra Tech Superfund Technical Assessment and Response Team (START) is submitting this letter concerning the site activities conducted at the American Drum and Pallet site located in Memphis, Shelby County, Tennessee. This letter summarizes the drum inventory obtained on July 12, 2007 including drum staging area locations, sample locations, physical states, and preliminary waste categories.

BUILDING No. 1

9 Drums	D1 - D9 (from outside Building No. 1 - west side)
65 Drums	D31 - D95 (from outside Building No. 1 - west side)
55 Drums	D96 - D150 (originally inside Building No. 1)
1 Drum	D236 (originally inside Building No. 1)
87 Drums	Empty and originally inside Building No. 1
16 Drums	Filled with trash and originally inside Building No. 1
7 Samples	(D2, D8, D9, D63, D76, D88, D89)

Of the D-numbered drums listed above, the following preliminary waste categories are described for Building No. 1.

40 Solid	(6-organic waste, 7-paint waste, 6-with organic vapor, 2-flammable with organic vapor, 1-waste debris, 18-unknown)
19 Sludge	(3-organic waste, 1-paint waste, 6-with organic vapor, 9-unknown)
3 Gel	(1-with organic vapor, 2-unknown)
55 Liquid	(11-with organic vapor, 4-flammable with organic vapor, 1-alkaline with organic vapor, 2-alkaline, 5-oily, 1-surfactant, 31-unknown)
3 Mixed	(1-liquid/solid with debris, flammable with organic vapor, 1-liquid/solid with debris and paint waste, 1-liquid/solid with rags)
3 Empty	
7 Inaccessible	



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BUILDING No. 2

8 Drums D151 - D158 (originally inside Building No. 2)
30 Drums Empty and originally inside Building No. 2
5 Drums Filled with trash and originally inside Building No. 2
1 Sample (D156)

Of the D-numbered drums listed above, the following preliminary waste categories are described for Building No. 2.

2 Gel (2-unknown)
3 Liquid (1-organic waste, 1-oily, 1-unknown)
2 Sludge (1-organic waste, 1-unknown)
1 Empty

BUILDING No. 3

11 Drums D20 - D30 (originally inside Building No. 3)
35 Drums D159 - D193 (originally inside Building No.3)
7 Drums Empty and originally inside Building No. 3
4 Samples (D23, D163, D170, D191)

Of the D-numbered drums listed above, the following preliminary waste categories are described for Building No. 3.

5 Solid (1-organic waste, 4-unknown)
8 Sludge (1-flammable organic waste, 7-unknown)
2 Gel (1-organic waste, 1-unknown)
28 Liquid (2-organic waste, 3-alkaline, 4-oily, 6-oil with debris, 2-oil with rags, 1-surfactant, 2-fragrant, 1-flammable, 7-unknown)
3 Inaccessible

Trash Pile South of Building No. 2

13 Drums D204 - D216 (staged at the entrance of Building No. 4)
3 Drums Empty and originally in the trash pile
2 Samples (D205, D208)

Of the D-numbered drums listed above, the following preliminary waste categories are described for the trash pile south of Building No. 2.

3 Solid (3-unknown)
1 Gel (1-unknown)
9 Liquid (1-acidic, 1-oily, 1-methyl parathion label, 6-unknown)

BUILDING No. 4

10 Drums D10 - D19 (originally inside Building No. 4 - west area)
4 Drums D200 - D203 (originally inside Building No. 4 - west area)

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16 Drums	D220 - D235 (originally inside Building No. 4 - east area)
12 Drums	Empty and originally inside Building No. 4
2 Drums	Filled with trash and originally inside Building No. 4
4 Samples	(D10, D201, D220, D222)

Of the D-numbered drums listed above, the following preliminary waste categories are described for Building No. 4.

5 Solid	(1-ammonium hydroxide crystals, 4-unknown)
8 Sludge	(1-oily, 7-unknown)
12 Liquid	(1-oily, 2-organic waste, 1-flammable, 8-unknown)
4 Empty	
1 Inaccessible	

If you have any questions, please contact me at (678) 775-3095.

Sincerely,



Yuen-Chang (Didi) Fung
Tetra Tech START III Deputy Program Manager