

ENCLOSURE

Ready for Reuse Basis of Decision
Former FJ Doyle Salvage Transformers Facility
EPA ID TXD980865109
Leonard, Fannin County, Texas

Introduction

The United States Environmental Protection Agency (EPA) Region 6 has determined that the former FJ Doyle Salvage Transformers Facility, located at 905 North Poplar Street in Leonard, Texas (the “Property”) is Ready for Reuse. The Property meets the criteria for the Ready for Reuse Determination since conditions on the Property are protective of human health and the environment, based on its current and future use, consistent with the deed notice filed in the Real Property Records in the Fannin County Clerk’s Office.

A description of the Property, site background information, and a summary of remedial activities and current conditions are provided in the following sections.

Property Description

The EPA Ready for Reuse Determination is being issued for the Property, as shown on the Site Layout Map in Figure 2. The former F.J. Doyle site is 0.47 acres and located in Leonard, Texas. The Property is located within a residential neighborhood and bounded to the east by North Poplar Street, to the north by East Cottonwood Street, and to the south and west by residential properties. The site is directly bordered by residential properties and a Leonard Independent School District (LISD) daycare facility to the south, with LISD elementary schools just south of the daycare facility. Leonard Junior High School is located to the east of the site. Leonard High School is located north east of the site.

Facility Background.

The Property operated under the ownership of Mr. Frank J. Doyle from 1974 until January 1997 when his son, Garry Doyle, took over the operation. The company discontinued operations in 1999. During its operation in the 1990s, the facility employed up to five workers. Frank Doyle received transformers from companies in Texas, Oklahoma, Louisiana, and Arkansas. Site operations included recovering oil, wiring, and scrap metal from the transformers. Based on historical records, the north central portion of the site was utilized to off-load and temporarily store out of service transformers from suppliers. Activities at the site included recycling transformers by draining the oil and by segregating the recoverable metals.

The southeastern portion of the site was used for long-term storage of transformers, and the southwestern portion of the site was used for storage of numerous containers of drums and tanks containing transformer oil. Various storage containers were utilized on-site to store drained liquids from the transformers including one 375-gallon container, two 500-gallon containers, and numerous 55-gallon drums. After the transformer cores had been drained of their remaining

liquids, they were placed in an oven to bake off remaining oil, paper, and varnish. The baked cores were then stripped for recoverable metals, primarily copper and aluminum. Occasionally, transformer oil was transferred from the storage tanks to trucks and shipped off-site to a disposal facility by an authorized waste oil transporter. Reportedly, the then-owner, Mr. Frank Doyle, used the oil for weed control and distributed the oil to various individuals for use as a weed killer in the 1970s.

The past use of polychlorinated biphenyls (PCBs) in electrical equipment, such as transformers and capacitors, was common until 1979, when PCBs were banned in the United States and became regulated under Title 40 of the Code of Federal Regulations, Part 761.

Summary of Site Assessments

Over approximately a twenty-five-year period, numerous investigations have been performed at the site. First, the EPA's Technical Assistance Team, Ecology and Environment, Inc., conducted an initial site assessment in 1991 in response to a citizen's complaint concerning the improper salvaging and handling of transformers. Ecology and Environmental collected soil samples from areas in the north and south of the salvage shop, where transformers were stored. Soils showed concentrations of the PCB, Aroclor 1260, above 50 parts per million (ppm). Ecology and Environmental also conducted additional off-site soil sampling and confirmed the presence of Aroclor 1260 along a drainage pathway south of the site with concentrations of 270 ppm.

Because of continuing concerns over the contamination of the site, in 1995, the U.S EPA Technical Assistance Team collected 94 soil samples at the site. Aroclor 1260 was detected adjacent to the south gate of the site at concentrations of 2,730 ppm. PCBs were also detected in the east side Transformer Storage Area, the southwest Storage Container Area, the northern Transformer Off-Load Area, and areas in the alleyway south of the site.

In 1997, the U.S EPA conducted a Preliminary Assessment, a site investigation under the Comprehensive Environmental Response, Compensation and Liability Act, to review file information, and conduct a comprehensive target survey and onsite reconnaissance. The investigation showed that FJ Doyle was registered with the Texas Water Commission, now the Texas Commission on Environmental Quality (TCEQ), for various hazardous wastes generated on site including used oil from non-PCB transformers, ash residue from a furnace used to varnish recovered copper wire, collection of general plant refuse, storage containers for used oil stored on a concrete pad, a high temperature oven to burn off varnish from recovered copper wire, and a four yard dumpster for accumulation of plant trash. Yellow-green stains were observed in the area where transformer oil was stored and transferred for shipment.

The exposures assessment concluded that it was unlikely that the Woodbine Formation aquifer (the public water supply for the City of Leonard) was contaminated from site activities. It also concluded that no perennial surface waters or wetlands lie within two miles downstream from the site; therefore, there was no threat to human health and the environment via the surface water exposure pathway. The soil exposure pathway appeared to be the main exposure pathway at this site since PCBs were identified to be present within the soil. The U.S EPA Technical Assistance

Team also collected 68 soil samples from both on and off-site residences. Soil samples collected at off-site residences showed PCB concentrations ranging from 10.44 ppm to 37.7 ppm. Soil samples collected in the alleyway between the site and the residence north of the site had PCB concentrations ranging from 5.7 ppm to 852 ppm. On-site soil samples collected had PCB concentrations ranging from 50.0 ppm to 2,730 ppm.

In 1998, the Texas Natural Resources Conservation Commission (TNRCC) (previously the Texas Water Commission, and now TCEQ), conducted a Screening Site Inspection (SSI) on behalf of the EPA. The goal of the SSI was to build upon existing environmental data by obtaining additional background information relevant to the site through a file review and by collecting environmental samples to further characterize conditions at the site. Approximately 20 soil samples and three drinking water well samples were collected during this SSI. The inspection concluded that contamination likely originated from on-site sources. The analyses of the samples taken showed some contained concentrations of PCBs, semi-volatile organic compounds/polycyclic aromatic hydrocarbons (SVOCs/PAHs) and Resource Conservation and Recovery Act metals above state and/or EPA guidelines. TNRCC found the maximum concentration of Aroclor 1260 to be 4,100 ppm located in the alleyway, southwest of the site in grid EAS08.

From April through October 2018, EPA Region 6 conducted a Removal Assessment of the site consisting of soil sampling, wipe sampling, paint chip sampling, and an asbestos survey of the former transformer salvage shop. A total of 374 samples, including duplicate samples, were collected/analyzed from 96 grids around the site, residential properties, easements, and rights-of-way. In 35 of the 96 grids, PCBs were detected above the site-specific action level of 1 ppm at depths ranging from 1 inch to 36 inches below ground surface. The PCB concentrations ranged from 1.01 ppm to 175 ppm,

Summary of EPA Cleanup and Closure Activities

From November 2018 through February 2019, U.S EPA Region 6 conducted a removal action at the site that consisted of contaminated soil excavations, soil sampling, and site restoration activities. A total of 55 grids were excavated to depths of 6 inches to 48 inches below ground surface and then backfilled and graded with clean soil brought to the site (see Figure 6). There were 85 confirmation soil samples, including Quality Assurance/Quality Control samples, collected from the base of each excavated area to verify that site-related contaminated soil had been removed. Excavation of contaminated soils continued if confirmation soil sampled showed concentrations above site-specific cleanup goals.

If excavation of contaminated soils could not be completed due to hitting bedrock or the presence of underground utilities, a highly visible, orange warning barrier was placed directly above the soil still exceeding cleanup goals to protect both human contact and the above clean soil from coming into contact with the contaminated soil (see Figure 6). PCB concentrations that remain covered under the orange warning barrier range from 0.0 ppm to 32 ppm. Activities completed by EPA at the FJ Doyle site included:

Removal of 3,240.68 tons of Toxic Substance Control Act (TSCA) regulated PCB soil and discarded material transported off-site and disposed of.

Removal of 6,026.68 tons of non-TSCA regulated excavated soils and discarded material transported off-site and disposed of.

165 gallons of waste oil transported off-site and disposed of.

30 cubic yards of scrap metal transported off-site and recycled.

Air monitoring during the entire removal action period with no exceedances detected.

After removal actions were completed, areas were restored, including grading and compacting excavated grids with 7,871 tons of select backfill, 1,496 tons of top-soil, 1,044 tons of limestone rock, 37,763 square feet of sod, and 15,000 square feet of hydro-seed. All backfill soil was analyzed for constituents and certified clean before used at the site.

On June 19, 2019, EPA Region 6 issued a letter to the current owners of the property, Danny and Garry Doyle and Lynda Kaylor, providing them with documentation regarding the removal action performed on the site. The letter provided information regarding contaminated soils excavation, sampling results prior to and following cleanup activities, and the location of physical controls. A copy of the letter is at Appendix A. The complete account of the removal actions conducted at the site can be found in the FJ Doyle Salvage Site Removal Action Report, TDD No. 0001/18-175.

From May to July 2020, the EPA Superfund Assessment and Response Team contractor, Weston Solutions, Inc., was tasked by EPA Region 6 to provide technical support for the Closure Assessment at the F.J Doyle Salvage site. Specifically, Weston Solutions was tasked to conduct the following: install a groundwater monitoring well and permanent property boundary markers; screen and log well soil borings; collect well soil borings and site groundwater samples; transport investigation-derived wastes; conduct a metes and bounds survey and provide a certified survey map with legal description; conduct a registered and unregistered water well survey around the site; and perform data validation and management for the site.

Weston Solutions found the two registered City of Leonard public water supply groundwater wells within 0.5 miles of the site (see Figure 4). As stated above, both registered wells were tapped into the Woodbine Formation around 1,464 feet below ground surface. Because the two public water supply wells are 1,464 ft below ground surface and are securely cemented, there is low permeability of the formations underlying the site, and PCBs are relatively insoluble in water and not likely mobilized, Weston concluded that PCBs were unlikely to contaminate the groundwater supply of the City of Leonard.

Weston identified no unregistered groundwater wells within the survey area during this assessment. In June 2020, Weston installed a groundwater monitoring well 32 feet below ground surface at the site. Groundwater was not observed in the monitoring well during any of the

sampling events that month and, on June 30, 2020, the groundwater monitoring well was plugged and abandoned (see Figure 10).

During this closure assessment, eight soil boring samples were also collected from depths ranging from 5 to 33 feet below ground surface and analyzed for site-specific contaminants. Upon review of the analytical results, lead and arsenic were detected at or above Residential and Commercial/Industrial Groundwater to Soil Ingestion Protective Concentration Levels, but they did not exceed Residential or Commercial/Industrial Total Combined Soil Protective Concentration Levels or Texas-specific background concentrations. Arsenic was detected at 5 ppm in sample FJD04-08. The Texas-specific background concentration for arsenic is 5.9 ppm. Since the arsenic concentration is below the Texas-specific background concentration, it remains protective of human health and the environment. Lead was detected in sample FJD04-08 at depths ranging from 5 to 33 inches below ground surface at concentrations ranging from 3 ppm to a maximum of 4.6 ppm. The Texas-specific background concentration is 15 ppm. Since the lead concentration is below the Texas-specific background concentration, it remains protective of human health and the environment.

Summary of Current Conditions

The site currently has no buildings or structures. It has gravel overlying most of the surface, with patches of vegetation and a wooden fence separating a residential property from the site on the western side of the Property. There are property markers located on all corners of the site. As stated above, a plugged and abandoned well is located in the southeast corner of the site (see Figure 10). Additional photos of current site conditions are provided at Figures 8 and 9.

Most of the contaminated soil has been removed from the site. The remaining contaminated soil lies below the ground surface underneath a highly visible orange warning barrier that is, itself, covered with clean soil. The locations of the orange warning barrier underneath sections of the Property can be found in Figure 6. PCB concentrations in soils that could not be removed and are covered by the orange warning barrier range from 0.0 ppm to 32 ppm.

Future Use

The physical controls (visual barrier, soil backfill, and gravel cover) and a land use control (deed notice) in place will be protective of the surrounding community and environment by preventing contact with contaminated media.

The deed notice filed in the Real Property Records provides information concerning certain environmental conditions and/or use limitations pursuant to the TCEQ Texas Risk Reduction Program (TRRP) regulations.

The deed notice must not be removed or modified without prior approval from TCEQ. The notice may be rendered of no further force or effect only by a superseding deed notice executed by the TCEQ or its successor agencies and filed in the same Real Property Records as those in which the deed notice is filed.

Status of TCEQ Industrial and Hazardous Waste Registration (SWR No. 80951)

In 2006, the Doyles initially notified the TCEQ Registration and Reporting Section of the closure of the facility and requested closure of the Industrial and Hazardous Waste registration. TCEQ subsequently requested the owners submit a Waste Management Unit (WMU) Closure Report and an Affected Property Assessment Report (APAR) to document the assessment and cleanup of contamination associated with the facility as required by TRRP rules. The facility submitted an APAR and WMU Closure report in 2015. TCEQ subsequently requested the facility submit a revised WMU Closure Report to provide more information and issued a notice of deficiency letter for the APAR. TCEQ's efforts to obtain all required documentation were unsuccessful until the EPA accepted the facility into its removal program.

With the completion of the removal action, EPA and TCEQ agree all necessary cleanup activities have been conducted and no more remediation is required. Based on a review of the EPA's August 2019 Removal Action Report, TCEQ administratively closed the Solid Waste Registration (SWR) for waste streams and waste management units at the Property on September 17, 2019. A TCEQ SWR report pulled December 1, 2020 indicated that the status of the Property (SWR No. 80951) was INACTIVE. Documents related to the SWR administrative closure are at Appendix B.

References

Texas Commission on Environmental Quality, Notice of Registration, Industrial and Hazardous Waste, Solid Waste Registration Number 90851, Status Report as of December 1, 2020.

Summary Report for F. J. Doyle Salvage Closure Assessment, 905 North Poplar Street, Leonard, Texas, Fannin County, Texas, TDD No. 0001/20-346. Weston Solutions, Inc., dated July 2020.

TCEQ Interoffice Memorandum from Ellie Wehner to Ann Marie Callery, Subject: Request for Administrative Closure of Industrial and Hazardous Waste Registration (SWR No. 80951), dated September 27, 2019.

F.J Doyle Salvage Removal Action Report, Leonard, Texas, TDD No. 0001/18-175. Weston Solutions, Inc., dated August 2019.

Letter to Danny Doyle, Garry Doyle, and Lynda Kaylor, Subject: F.J. Doyle Salvage, Property Identification #FJD04, Soil Removal Action at 905 N. Poplar St. Gary Moore, Federal On-Scene Coordinator, U.S. EPA Region 6 – Superfund Division, dated June 19, 2019.

Removal Assessment Report for Frank J. Doyle Site, Leonard, Fanning County, TX, TDD No. 0001/17-004. Westin Solutions, Inc., dated March 2019.

Affected Property Assessment Report, Leonard, Texas. Terra-Solve, dated August 2015,

Screening Site Inspection Report for Doyle, Frank J. Transformer Site, aka: Frank J. Doyle Transformer, Leonard, Texas, TXD980865109, Leonard, Fannin County, Texas. Texas Natural

Resource Conservation Commission (in Cooperation with the U.S. Environmental Protection Agency), dated September 1998.

Preliminary Assessment Report, Doyle, Frank J., EPA ID No. TXD980865109, Leonard, Fannin County, Texas. U.S EPA Region 6, dated May 1997.

List of Figures:

- Figure 1: General Site Location Map
- Figure 2: General Site Area Map
- Figure 3: Former Site Layout Map
- Figure 4: Locations of Public Water Supply Wells
- Figure 5: Location of Site-specific Groundwater Monitoring Wells
- Figure 6: Removal Excavation Map
- Figure 7: Sample Grid Map
- Figure 8: Photograph of Current Site Conditions (Facing West)
- Figure 9: Photograph of Current Site Conditions (Facing North)
- Figure 10: Photograph of Plugged and Abandoned Well

Appendices:

- A. Letter from EPA On-Scene Coordinator, Gary Moore, to Danny Doyle, Garry Doyle, and Lynda Kaylor Regarding Soil Removal Action at 905 N. Poplar Street
- B. Documentation of TCEQ Solid Waste Registration Closure for Former FJ Doyle Property

FIGURES

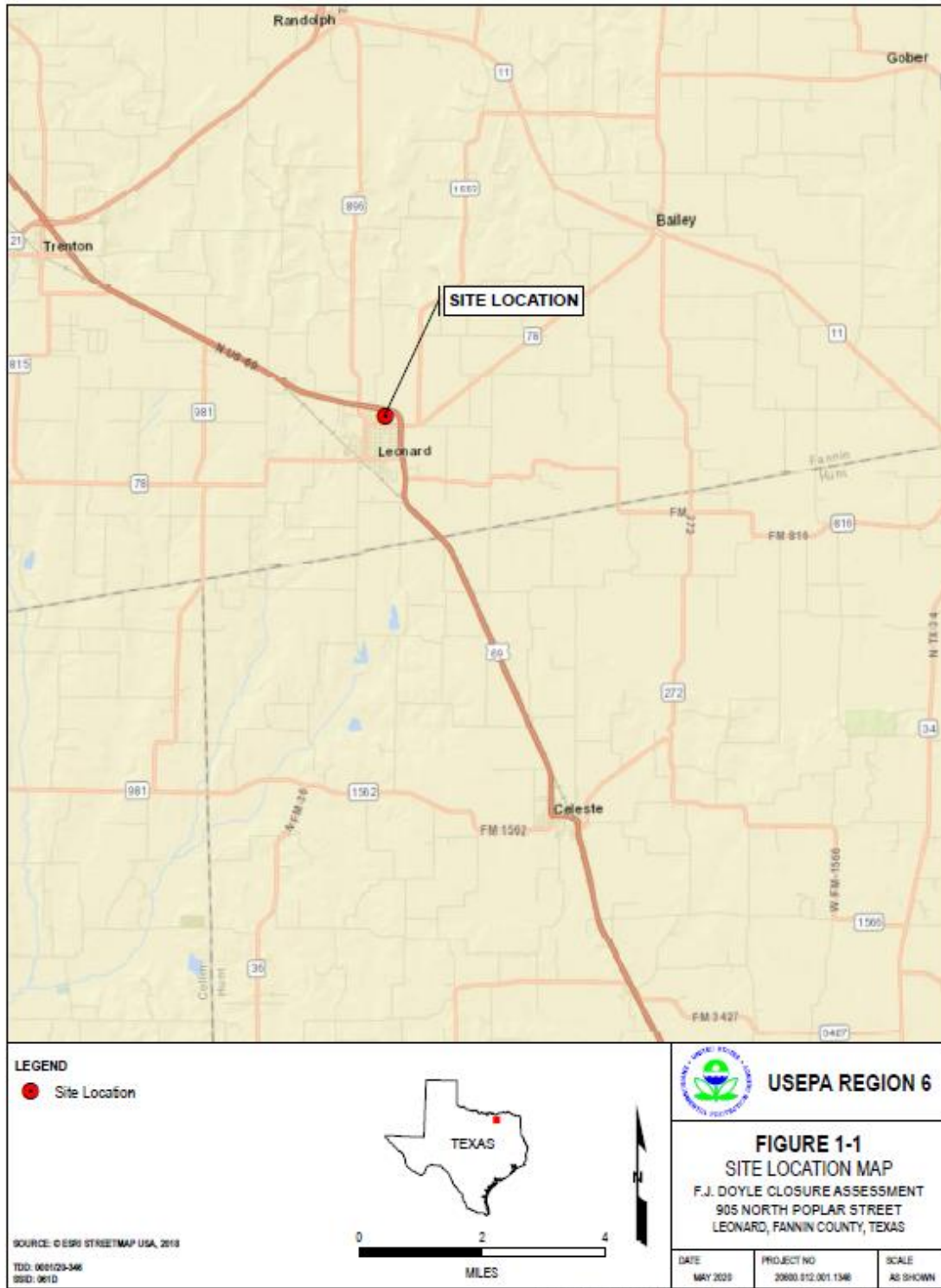


Figure 1: General site location map taken from F.J Doyle Salvage Closure Assessment (TDD No. 0001/20-346).



Figure 2: General site area map taken from F.J Doyle Salvage Closure Assessment (TDD No. 0001/20-346).

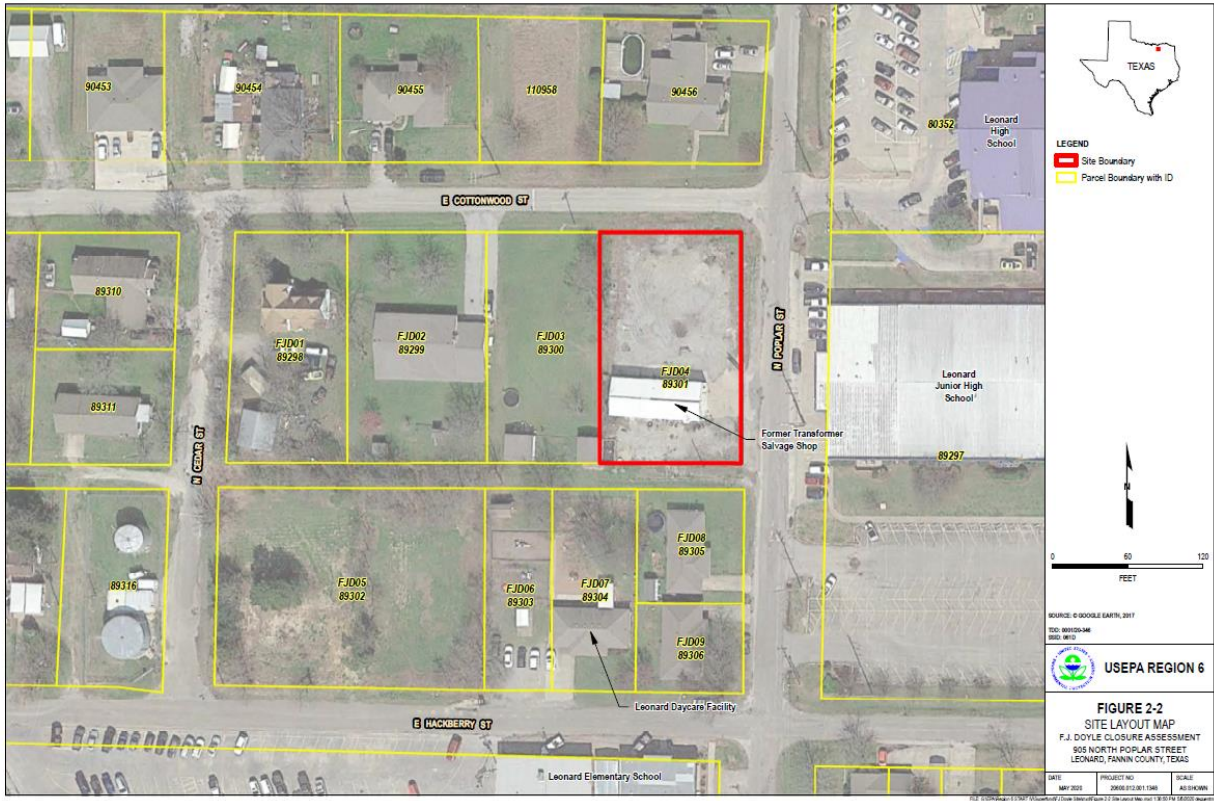


Figure 3: Former site layout map taken from F.J Doyle Salvage Closure Assessment (TDD No. 0001/20-346).

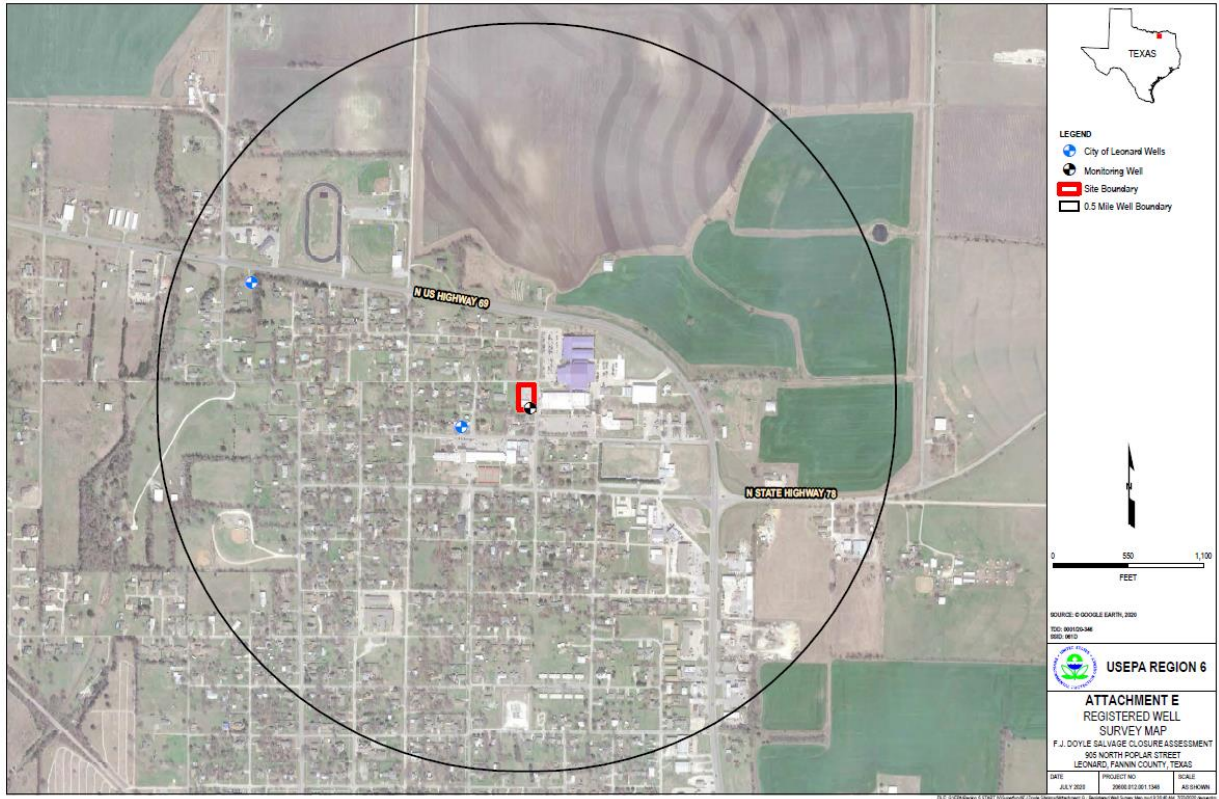


Figure 4: Locations of the two identified public water supply wells for the City of Leonard taken from F.J Doyle Salvage Closure Assessment (TDD No. 0001/20-346).

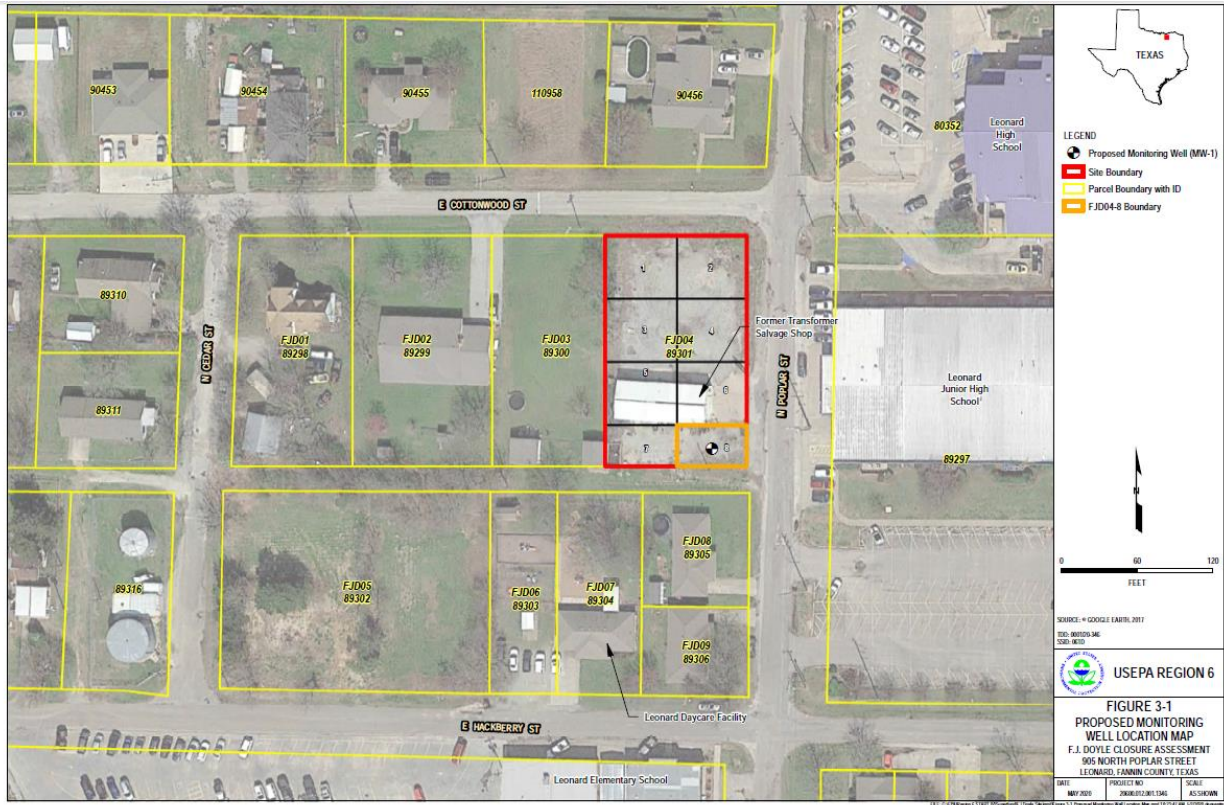


Figure 5: Location of the site-specific groundwater monitoring well that was installed and subsequently plugged and abandoned. Taken from F.J Doyle Salvage Closure (Assessment TDD No. 0001/20-346).

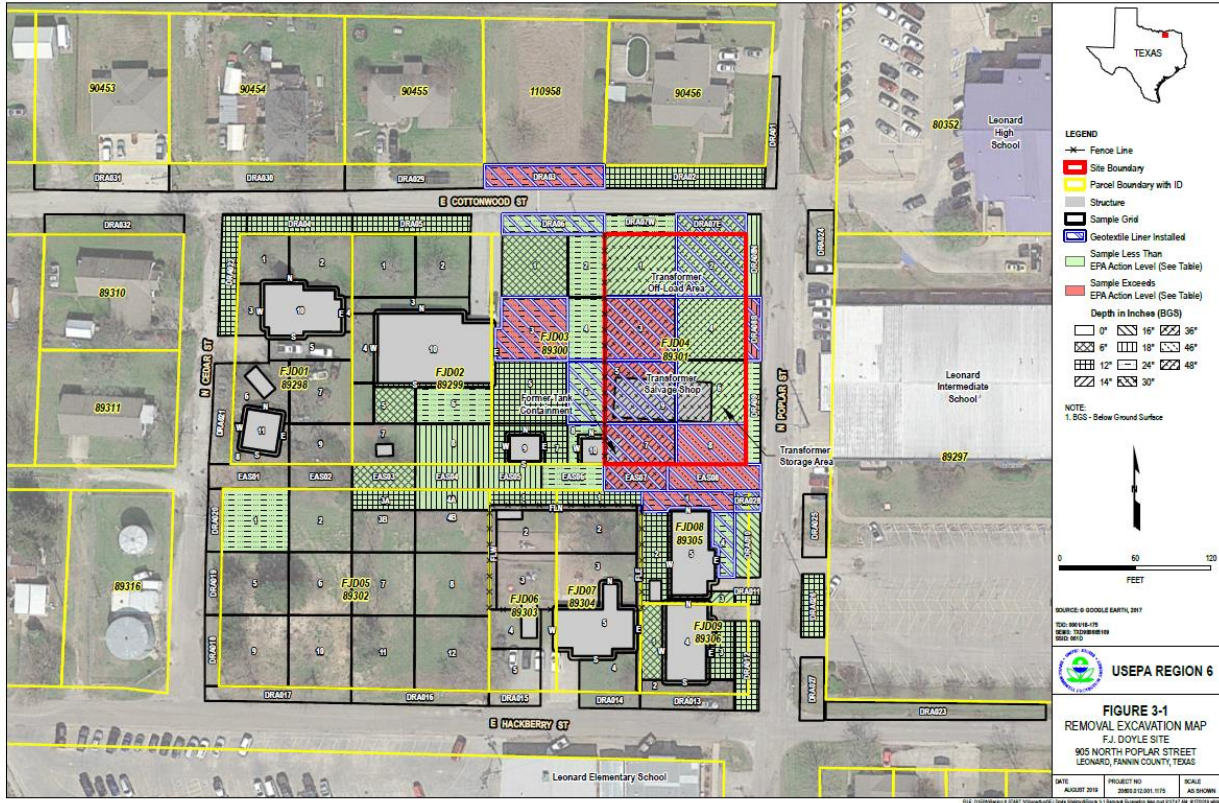


Figure 6: Removal excavation map depicting the grids where excavation activities ensued including depth, the sampled grids, and the location of the highly visible orange protection barrier remaining in the ground. Taken from the F.J Doyle Salvage Site Removal Action Report (TDD No. 0001/18-175).

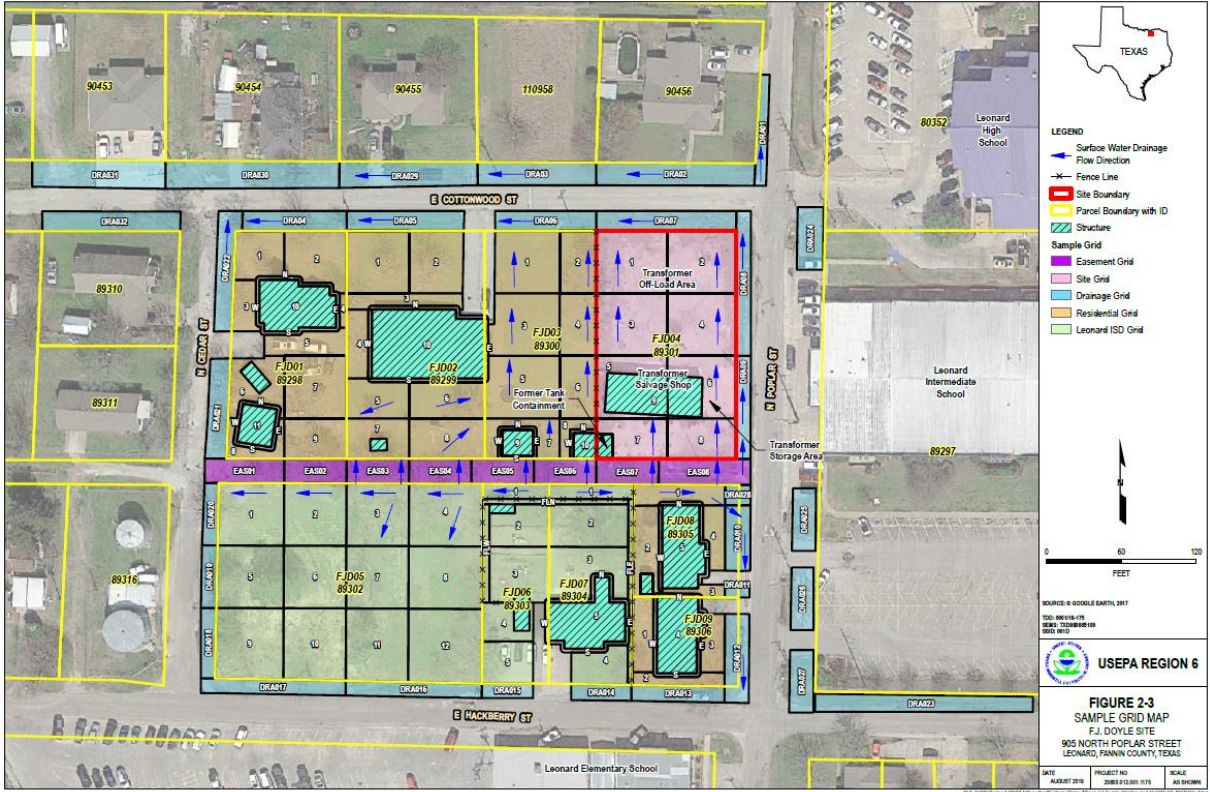


Figure 7: Sample grid map depicting site boundaries, residential boundaries, and surface drainage patterns. Taken from the F.J Doyle Salvage Site Removal Action Report (TDD No. 0001/18-175).



Incident Name: F.J. Doyle Salvage Closure Assessment
Event Name: F.J. Doyle Salvage Closure Assessment
Photo Type: Overview
Direction: W
Photo Name: IMG_5813
Date and Time: 6/2/2020 7:23:00 AM
Latitude: 33.389180
Longitude: -96.242880
Photographer: Austin Lindsey
Witness: Derrick Cobb
Caption: View of site.

Figure 8: Photograph of current site conditions taken from F.J Doyle Salvage Closure Assessment (TDD No. 0001/20-346).



Incident Name: F.J. Doyle Salvage Closure Assessment
Event Name: F.J. Doyle Salvage Closure Assessment
Photo Type: Overview
Direction: N
Photo Name: IMG_5831
Date and Time: 6/2/2020 11:22:21 AM
Latitude: 33.389052
Longitude: -96.243155
Photographer: Austin Lindsey
Witness: Derrick Cobb
Caption: View of site.

Figure 9: Photograph of current site conditions taken from F.J Doyle Salvage Closure Assessment (TDD No. 0001/20-346).



Incident Name: F.J. Doyle Salvage Closure Assessment
Event Name: F.J. Doyle Salvage Closure Assessment
Photo Type: Overview
Direction: N
Photo Name: IMG_6030
Date and Time: 6/30/2020 10:39:54 AM
Latitude: 33.389255
Longitude: -96.243033
Photographer: Austin Lindsey
Witness: John Waken
Caption: View of former well site following the plugging and abandonment of the well.

Figure 10: Photograph of the plugged and abandoned well taken from F.J Doyle Salvage Closure Assessment (TDD No. 0001/20-346).

APPENDICES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

19 June 2019

Danny Doyle, Garry Doyle, and Lynda Kaylor
P.O. Box 511
Leonard, Texas 75452

RE: F.J. Doyle Salvage, Property Identification # FJD04
Soil Removal Action at 905 N. Poplar St.

Dear Danny Doyle, Garry Doyle, and Lynda Kaylor: Owners of 905 N. Poplar St. Leonard, TX 75452.
Property Legal Description: COLLEGE ADDN, BLOCK 14, LOT 7,8, ACRES .344

The purpose of this letter is to provide you with documentation confirming that the United States Environmental Protection Agency (EPA) recently completed the removal of soil contaminated by polychlorinated biphenyls (PCBs), semivolatile organic compounds (SVOCs), and metals on your property and surrounding properties; and, remediation consisted of removal of soil from various locations on your property. The remediation activities were conducted based on previous sampling results reviewed by the EPA, the Texas Commission on Environmental Quality (TCEQ), and the Agency for Toxic Substances and Disease Registry (ATSDR). The removal assessment activities in the area were conducted between 26 April 2018 and 05 October 2018. The removal action activities in the area were conducted between 05 November 2018 and 19 February 2019. The maximum excavation depth (variable due to the depth of bedrock) on your property at 905 N. Poplar St. was up to 48 inches below the ground surface. Your property was then backfilled with clean soil and sodded, seeded, backfilled with limestone rock, or some combination of those.

In areas on your property and surrounding properties where contaminated soil remains at final excavation depth an orange geotextile liner was placed as a contamination notification for possible future excavation activities. Additionally, the EPA allowed the installation of the orange geotextile liner in some areas prior to receiving analytical results when maximum excavation depth was achieved and failure to backfill would delay project completion (in these areas you can disregard the use of the orange geotextile liner warning). See the attached analytical summary table and map for sampling results for your property and surrounding City of Leonard right-of-way properties, as well as locations of where the orange geotextile liner was applied to your property.

Please save this document for your permanent records. If you sell, transfer, or refinance the property you will have documentation of the PCB, SVOCs, and metal contamination and the EPA removal action conducted on your property.

The EPA thanks you for your patience and understanding as we know that cleanup activities of this nature are disruptive to the community. If you have any questions concerning the work conducted on your property, you can contact me at 214-665-6609.

Sincerely,



Gary Moore
Federal On-Scene Coordinator
U.S. EPA Region 6 - Superfund Division

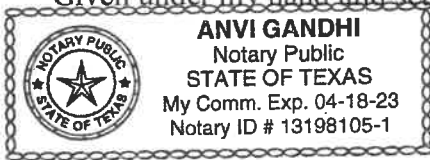
Attachments:

Assessment Map
Assessment Table
Excavation Map
Removal Table

State of Texas
County of COLLIN

Before me, ANVI GANDHI on this day personally appeared GARY MOORE, known to me (or proved to me on the oath of AFFIRMATION or through (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

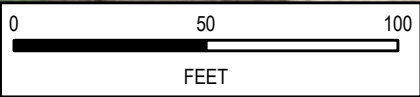
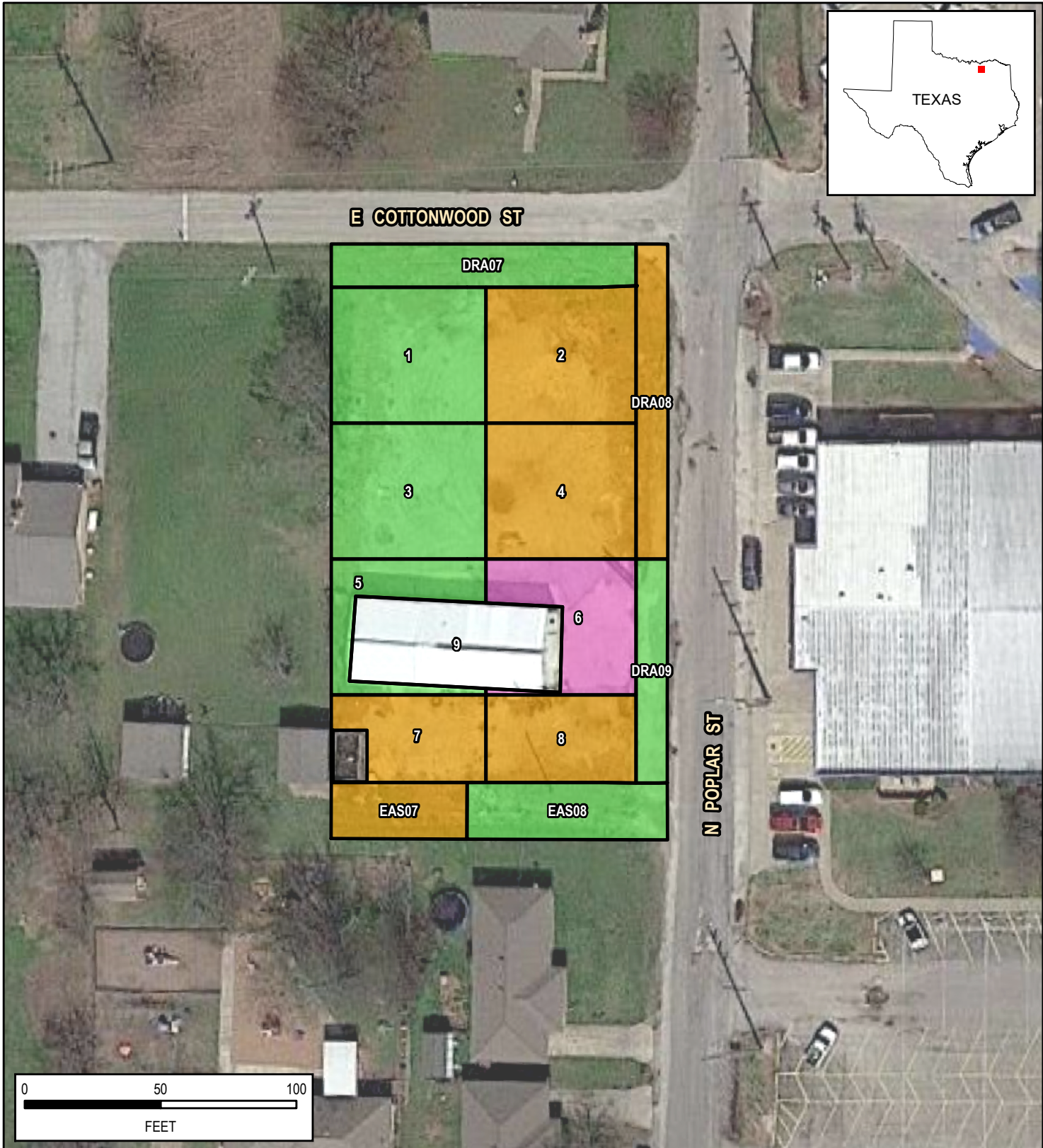
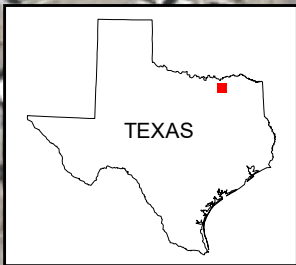
Given under my hand and seal of office this 19th day of June, (year). 2019.



(Personalized Seal)



Notary Public's Signature



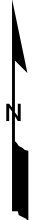
LEGEND

- Sample Grid (EAS - Easement Grid, DRA - Drainage Grid)
- PCB Contamination ≥ 1 mg/kg
- PCB+Metals Contamination
- Total PCBs Results ≥ 50 mg/kg

SOURCE: © GOOGLE EARTH, 2018
 TDD: 0001/18-175
 SEMS: TXD980865109
 SSID: 061D



USEPA REGION 6



PROPERTY FJD04
905 N. POPLAR
ASSESSMENT MAP
 FJ DOYLE SALVAGE REMOVAL
 LEONARD, FANNIN COUNTY, TEXAS

DATE JUNE 2019	PROJECT NO 20600.012.001.1175	SCALE AS SHOWN
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Assessment Table
Soil Analytical Data
Assessment Sample Results - Doyle - FJD04
Leonard, Fannin County, Texas

Analyte					Aroclors	Total PCBs	Metals	Arsenic	Cobalt	Copper	Lead	Manganese	SVOCs	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Dibenz(a,h)anthracene	Indeno(1,2,3-cd)pyrene
CAS.NO						GCSV-07-1		7440-38-2	7440-48-4	7440-50-8	7439-92-1	7439-96-5		56-55-3	50-32-8	205-99-2	53-70-3	193-39-5
Units						mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Site Specific Cleanup Levels						1		20	23	3100	400	1800		11	1.1	11	1.1	11
Station	Sample ID	Depth	Date	Type		--	--	--	--	--	--	--		--	--	--	--	--
DRA07	DRA07-20180502-01-51	0"-1"	5/2/2018	FS		2.88 JL	40.1	4.88	2150	92.5	584		0.08 U	0.11 U	0.15 U	0.21 U	0.16 U	
DRA07	DRA07-20180502-06-51	0"-6"	5/2/2018	FS		12.7	15.6	7.59	2860	142	879		0.03 JQ	0.04 JQ	0.01 U	0.02 U	0.05 JQ	
DRA07	DRA07-20180502-24-51	12"-24"	5/2/2018	FS		0.04 JQK	2.88 JK	3.52 JK	41.6	5.05 JK	910 JK		0.00942 UJL	0.01 UJL	0.01 UJL	0.02 UJL	0.01 UJL	
DRA07	DRA07-20180502-24-52	12"-24"	5/2/2018	FD		0.05 JK	6.05 JK	15.2 JK	42.1 JK	18.8 JK	2270 JK		0.009 U	0.01 U	0.01 U	0.02 U	0.01 U	
DRA07	DRA07-20180502-12-51	6"-12"	5/2/2018	FS		0.07 JK	10.1	14.7	121	21	2520		0.00956 U	0.01 U	0.01 U	0.02 U	0.01 U	
DRA08	DRA08-20180502-01-51	0"-1"	5/2/2018	FS		96.5	42.7	6.88	4230	129	918 JK		0.09 U	0.13 U	0.17 U	0.24 U	0.18 U	
DRA08	DRA08-20180502-06-51	0"-6"	5/2/2018	FS		2.4 JL	21.1	5.36	3980	139	604		0.09 JQL	0.13 JQL	0.01 UJL	0.03 JQL	0.16 JQL	
DRA08	DRA08-20180502-24-51	12"-24"	5/2/2018	FS		0.00739 U	8.25	16	84.7	23.3	2200 JK		0.00964 U	0.01 U	0.01 U	0.02 U	0.01 U	
DRA08	DRA08-20180502-12-51	6"-12"	5/2/2018	FS		0.00762 U	4.88 JK	11.4	111	22.1	1330		0.00993 U	0.01 U	0.01 U	0.02 U	0.01 U	
DRA08	DRA08-20180502-12-52	6"-12"	5/2/2018	FD		0.02 JQK	8.89 JK	10.4	123	21.9	1200		0.00878 U	0.01 U	0.01 U	0.02 U	0.01 U	
DRA09	DRA09-20180502-01-51	0"-1"	5/2/2018	FS		2.05	8.45	3.58 JQ	5270	52.2	474 JK		0.07 U	0.1 U	0.13 U	0.18 U	0.14 U	
DRA09	DRA09-20180502-06-51	0"-6"	5/2/2018	FS		3.06 JL	8.6	5.83	1560	163	588		0.05 JQ	0.07 JQ	0.09 JQ	0.02 U	0.05 JQ	
DRA09	DRA09-20180502-24-51	12"-24"	5/2/2018	FS		0.09 JK	4.65	10.1	77	20.4	1070		0.00832 U	0.01 U	0.01 U	0.02 U	0.01 U	
DRA09	DRA09-20180502-12-51	6"-12"	5/2/2018	FS		42.6	5.68	11.5	98.5	24.6	1660 JK		0.00831 U	0.01 U	0.01 U	0.02 U	0.01 U	
EAS07	EAS07-20180503-01-51	0"-1"	5/3/2018	FS		95.1	8.69	10.3	1490	63.5	1430 JK		0.00833 U	0.02 JQ	0.01 U	0.02 U	0.02 JQ	
EAS07	EAS07-20180503-06-51	0"-6"	5/3/2018	FS		32.6	9.93	5.14	884	37.6	692 JK		0.02 JQ	0.04 JQ	0.07 JQ	0.01 U	0.04 JQ	
EAS07	EAS07-20180503-24-51	12"-24"	5/3/2018	FS		2.42	4.25	19.6	21.3	29.3	2970		0.00861 U	0.01 U	0.01 U	0.02 U	0.01 U	
EAS07	EAS07-20180503-24-52	12"-24"	5/3/2018	FD		3.94	5.06	16.3	15.6	18.9	2040		0.00865 U	0.01 U	0.01 U	0.02 U	0.01 U	
EAS07	EAS07-20180503-36-51	24"-36"	5/3/2018	FS		72.6	2.74	3.78	111	14.6	858		0.00902 U	0.01 U	0.01 U	0.02 U	0.01 U	
EAS07	EAS07-20180503-12-51	6"-12"	5/3/2018	FS		1.33 JL	5.38	15	32.1	40.7	1480		0.00905 U	0.01 U	0.01 U	0.02 U	0.01 U	
EAS08	EAS08-20180503-01-51	0"-1"	5/3/2018	FS		4.12 JL	6.42	3.16	393	16.9	557		0.06 JQ	0.12 JQ	0.19 JQ	0.03 JQ	0.11 JQ	
EAS08	EAS08-20180503-06-51	0"-6"	5/3/2018	FS		8.51	6.94	6.67	420	21.6	1090		0.03 JQ	0.06 JQ	0.09 JQ	0.01 U	0.06 JQ	
EAS08	EAS08-20180503-24-51	12"-24"	5/3/2018	FS		0.91 JK	9.96	14.6	62.5 JK	30	1550 JK		0.00927 U	0.01 U	0.01 U	0.02 U	0.01 U	
EAS08	EAS08-20180503-24-52	12"-24"	5/3/2018	FD		3.25 JK	4.76	17.3	25.6 JK	23.6	1840 JK		0.00867 U	0.01 U	0.01 U	0.02 U	0.01 U	
EAS08	EAS08-20180503-36-51	24"-36"	5/3/2018	FS		0.08 JL	5.98	16.3	29.2	21.3	2070		0.00891 U	0.01 U	0.01 U	0.02 U	0.01 U	
EAS08	EAS08-20180503-12-51	6"-12"	5/3/2018	FS		0.58 JL	12.6	15.5	62.8	28.2	1930		0.00885 U	0.01 U	0.01 U	0.02 U	0.01 U	
FJD04-01	FJD04-01-20180502-01-51	0"-1"	5/2/2018	FS		4.29 JL	12.8	4.77 JQ	4980	175	525 JK		0.04 JQ	0.06 JQ	0.01 U	0.01 U	0.07 JQ	
FJD04-01	FJD04-01-20180502-06-51	0"-6"	5/2/2018	FS		0.26 JK	6.98 JQ	8.1 JQ	5580	316	1070		0.02 JQL	0.01 JQL	0.01 UJL	0.02 UJL	0.01 JQL	
FJD04-01	FJD04-01-20180502-24-51	12"-24"	5/2/2018	FS		0.14 JK	4.17	30.9	53.3	24.2	4490		0.0092 U	0.01 U	0.01 U	0.02 U	0.01 U	
FJD04-01	FJD04-01-20180502-36-51	24"-36"	5/2/2018	FS		0.04 JK	4.36	15	141	33.7	1770		0.00913 UJL	0.01 UJL	0.01 UJL	0.02 UJL	0.01 UJL	



Assessment Table
Soil Analytical Data
Assessment Sample Results - Doyle - FJD04
Leonard, Fannin County, Texas

Analyte					Aroclors	Total PCBs	Metals	Arsenic	Cobalt	Copper	Lead	Manganese	SVOCs	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Dibenz(a,h)anthracene	Indeno(1,2,3-cd)pyrene
CAS.NO						GCSV-07-1		7440-38-2	7440-48-4	7440-50-8	7439-92-1	7439-96-5		56-55-3	50-32-8	205-99-2	53-70-3	193-39-5
Units						mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Site Specific Cleanup Levels						1		20	23	3100	400	1800		11	1.1	11	1.1	11
Station	Sample ID	Depth	Date	Type		--	--	--	--	--	--	--		--	--	--	--	--
FJD04-01	FJD04-01-20180502-12-51	6"-12"	5/2/2018	FS		0.25 JK		4.63	12.7	153	21.4	1240 JK		0.00964 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-02	FJD04-02-20180502-01-51	0"-1"	5/2/2018	FS		92.9		68.2	23.3	4860	158	539 JK		0.03 JQ	0.04 JQ	0.08 JQ	0.01 U	0.03 JQ
FJD04-02	FJD04-02-20180502-06-51	0"-6"	5/2/2018	FS		0.44 JK		8.06	11	187	40.6	802 JK		0.00816 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-02	FJD04-02-20180502-24-51	12"-24"	5/2/2018	FS		0.28		3.73	12.6	83.5	22.4	1780		0.00955 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-02	FJD04-02-20180502-36-51	24"-36"	5/2/2018	FS		0.04 JK		3.91	15.1	90.8	22.8	1880		0.00909 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-02	FJD04-02-20180502-12-51	6"-12"	5/2/2018	FS		0.12 JK		5.9	11.8	46.6	21.4	1460		0.00935 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-02	FJD04-02-20180502-12-52	6"-12"	5/2/2018	FD		0.16 JK		5.65	16.1	34.9	32.2	1210		0.0093 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-03	FJD04-03-20180502-01-51	0"-1"	5/2/2018	FS		1.99 JH		9.84 U	9.84 U	21800	341	293		0.02 JQ	0.03 JQ	0.05 JQ	0.01 U	0.02 JQ
FJD04-03	FJD04-03-20180502-06-51	0"-6"	5/2/2018	FS		0.25 JK		2.03 JQ	2.88 JQ	3010	54.9	286		0.00778 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-03	FJD04-03-20180502-24-51	12"-24"	5/2/2018	FS		0.09 JK		5.02	14.9	360	27.5	2240		0.00928 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-03	FJD04-03-20180502-36-51	24"-36"	5/2/2018	FS		0.37		3.84	14.4	122	20	1630		0.00913 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-03	FJD04-03-20180502-12-51	6"-12"	5/2/2018	FS		0.04 JK		5.08	12.5	221	18	2810		0.0088 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-04	FJD04-04-20180502-01-51	0"-1"	5/2/2018	FS		4.35 JK		28.6	3.68 U	9590	177	299		0.03 JQ	0.01 U	0.01 U	0.01 U	0.06 JQ
FJD04-04	FJD04-04-20180502-06-51	0"-6"	5/2/2018	FS		64.5		3.09	6.43	1660	35.2	867		0.00793 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-04	FJD04-04-20180502-24-51	12"-24"	5/2/2018	FS		0.03 JQK		5.96	17.3	130	21.6	3730		0.02 JQ	0.02 JQ	0.01 U	0.02 U	0.01 U
FJD04-04	FJD04-04-20180502-36-51	24"-36"	5/2/2018	FS		0.18 JK		5.2	15.7	192	28.2	1230		0.00898 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-04	FJD04-04-20180502-36-52	24"-36"	5/2/2018	FD		1.11 JK		4.34	12.9	158	23.5	1050		0.00943 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-04	FJD04-04-20180502-12-51	6"-12"	5/2/2018	FS		0.23		9.44	4.86	340	34.3	427		0.00866 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-05	FJD04-05-20180503-24-51	12"-24"	5/3/2018	FS		0.06 JK		5.15	15.9	122 JK	26.4	2140		0.01 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-05	FJD04-05-20180503-24-52	12"-24"	5/3/2018	FD		0.09		5.15	15.5	333 JK	21.8	1990		0.05 JQ	0.1 JQ	0.21 JQ	0.03 JQ	0.09 JQ
FJD04-05	FJD04-05-20180503-36-51	24"-36"	5/3/2018	FS		0.02 JQ		5.67	14.7	24.1 JK	27.9	1600		0.00956 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-05	FJD04-05-20180503-36-52	24"-36"	5/3/2018	FD		0.13		7.65	19.8	362 JK	27.8	2330		0.00927 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-05	FJD04-05-20180503-12-51	6"-12"	5/3/2018	FS		0.00668 U		2.56	5.95	11.4 JK	5.21 JK	1020 JK		0.00854 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-05	FJD04-05-20180503-12-52	6"-12"	5/3/2018	FD		1.24 JK		4.85	3.76	531 JK	57.6 JK	567 JK		0.00818 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-06	FJD04-06-20180503-06-51	0"-6"	5/3/2018	FS		26.7		4.87	9.15	115	15.9	748		0.00827 U	0.12 JQ	0.01 U	0.02 U	0.11 JQ
FJD04-06	FJD04-06-20180503-24-51	12"-24"	5/3/2018	FS		0.00757 U		4.44	10.7	16.3	23.2	1370		0.0098 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-06	FJD04-06-20180503-36-51	24"-36"	5/3/2018	FS		0.02 JQK		5.22	14.2	16.1	18.6	1310		0.00934 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-06	FJD04-06-20180503-12-51	6"-12"	5/3/2018	FS		1.51 JK		5.99	7.91	118	37.5	805		0.00852 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-07	FJD04-07-20180502-01-52	0"-1"	5/2/2018	FD		4.3		4.28 JQ	3.27 U	7180	577	526		0.08 JQ	0.12 JQ	0.23 JQ	0.04 JQ	0.18 JQ
FJD04-07	FJD04-07-20180503-01-51	0"-1"	5/3/2018	FS		14.8		5.04 JQ	3.37 U	9400	701	481		0.07 JQ	0.09 JQ	0.01 U	0.02 JQ	0.1 JQ
FJD04-07	FJD04-07-20180503-01-52	0"-1"	5/3/2018	FD		15.9		4.8 JQ	4.05 U	9510	1480	411		0.05 JQ	0.07 JQ	0.14 JQ	0.02 JQ	0.08 JQ



**Assessment Table
Soil Analytical Data
Assessment Sample Results - Doyle - FJD04
Leonard, Fannin County, Texas**

Analyte					Aroclors	Total PCBs	Metals	Arsenic	Cobalt	Copper	Lead	Manganese	SVOCs	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Dibenz(a,h)anthracene	Indeno(1,2,3-cd)pyrene
CAS.NO						GCSV-07-1		7440-38-2	7440-48-4	7440-50-8	7439-92-1	7439-96-5		56-55-3	50-32-8	205-99-2	53-70-3	193-39-5
Units						mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Site Specific Cleanup Levels						1		20	23	3100	400	1800		11	1.1	11	1.1	11
Station	Sample ID	Depth	Date	Type		--	--	--	--	--	--	--		--	--	--	--	--
FJD04-07	FJD04-07-20180503-06-51	0"-6"	5/3/2018	FS		175		4.14	3.54	1140	62.3	396		0.00814 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-07	FJD04-07-20180503-24-51	12"-24"	5/3/2018	FS		0.11 JK		5.41	15.6	125	38	2080		0.00961 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-07	FJD04-07-20180503-36-51	24"-36"	5/3/2018	FS		34.1		5.03	11.5	84	32	1430		0.00937 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-07	FJD04-07-20180503-12-51	6"-12"	5/3/2018	FS		0.89 JK		5.7	18.9 JK	68.9	25.2	1690 JK		0.00965 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-07	FJD04-07-20180503-12-52	6"-12"	5/3/2018	FD		6.82		6.36	12.1	37.5 JK	24.7	874 JK		0.02 JQ	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-08	FJD04-08-20180503-01-51	0"-1"	5/3/2018	FS		38.5 JK		14.9	5.57 JQ	14300	357	551 JK		0.12 JQ	0.1 JQ	0.22 JQ	0.02 JQ	0.1 JQ
FJD04-08	FJD04-08-20180503-06-51	0"-6"	5/3/2018	FS		146		6.28 JQ	5.21 JQ	3230	141	612		0.06 JQ	0.1 JQ	0.01 U	0.02 JQ	0.09 JQ
FJD04-08	FJD04-08-20180503-24-51	12"-24"	5/3/2018	FS		0.68 JK		5.36	10.7	178	30.2	926		0.00949 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-08	FJD04-08-20180503-36-51	24"-36"	5/3/2018	FS		1.7		5.32	14.1	189	41.9	1960		0.00909 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-08	FJD04-08-20180503-12-51	6"-12"	5/3/2018	FS		3.49		4.79	8.16	212	36.3	689 JK		0.08 JQ	0.08 JQ	0.18 JQ	0.02 JQ	0.07 JQ
FJD04-09	FJD04-09-20180503-24-51	12"-24"	5/3/2018	FS		0.07 JK		7.08	16	23.1	22.2	1600		0.00992 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-09	FJD04-09-20180503-36-51	24"-36"	5/3/2018	FS		0.08 JQK		8.56	9.73	46.5	41.5	1370		0.01 U	0.01 U	0.01 U	0.02 U	0.01 U
FJD04-09	FJD04-09-20180503-12-51	6"-12"	5/3/2018	FS		0.18 JK		1.72	2.32	1570	179	262		0.00799 U	0.01 U	0.01 U	0.02 U	0.01 U

Notes:

FS - Field Sample

FD - Field Duplicate

NP - Not Published

mg/kg - milligrams per kilogram.

" - Inches

H - High bias

J - The identification of the analyte is acceptable; the reported value is an estimate

K - Unknown bias

L - Low bias

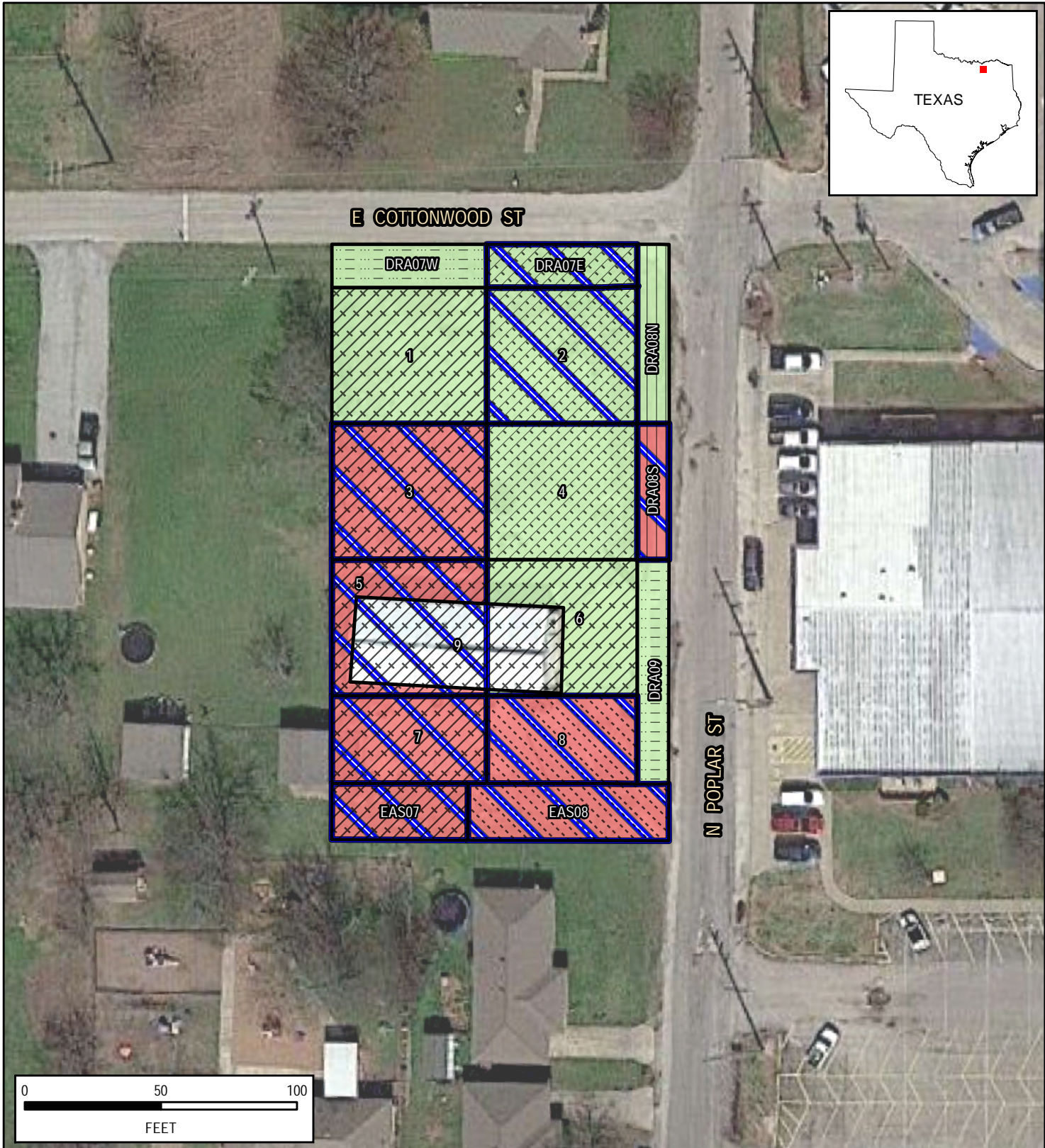
Q - Detected below the quantitation limit

U - Analyte not detected

Bold - Value exceeds the detection limit for specific sample analyte

Highlighted value exceeds the Cleanup level for the specific sample analyte





LEGEND

- Sample Grid (EAS - Easement Grid, DRA - Drainage Grid)
- Sample Less Than EPA Action Level (See Table)
- Sample Exceeds EPA Action Level (See Table)

- Geotextile Liner Installed
- Excavation Depth (Inches BGS)
 - 18"
 - 24"
 - 36"
 - 46"
 - 48"



USEPA REGION 6

PROPERTY FJD04
905 N. POPLAR
EXCAVATION MAP
FJ DOYLE SALVAGE REMOVAL
LEONARD, FANNIN COUNTY, TEXAS

DATE JUNE 2019	PROJECT NO 20600.012.001.1175	SCALE AS SHOWN
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SOURCE: © GOOGLE EARTH, 2018
 TDD: 0001/18-175
 SEMS: TXD980865109
 SSID: 061D

BGS - Below Ground Surface

**Removal Table
Soil Analytical Data
Confirmation Sample Results - Doyle - FJD04
Leonard, Fannin County, Texas**

Analyte					Aroclors	Total PCBs	Metals	Arsenic	Cobalt	Copper	Lead	Manganese	SVOCs	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Dibenz(a,h)anthracene	Indeno(1,2,3-cd)pyrene
CAS.NO						GCSV-07-1		7440-38-2	7440-48-4	7440-50-8	7439-92-1	7439-96-5		56-55-3	50-32-8	205-99-2	53-70-3	193-39-5
Units						mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Site Specific Cleanup Levels						1		20	23	3100	400	1800		11	1.1	11	1.1	11
Station	Sample ID	Depth	Date	Type		--	--	--	--	--	--	--		--	--	--	--	--
DRA07E	DRA07E-20190213-48-56	48"-48"	2/13/2019	FS		0.0772	5.93	6.27	8.95	7.81	1100		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
DRA07E	DRA07E-20190213-48-57	48"-48"	2/13/2019	FD		0.079	5.01	5.24	6.85	5.46	1160		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
DRA07W	DRA07W-20190201-24-56	24"-24"	2/1/2019	FS		0.045	3.46	4.25	10.7	5.86	1300		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
DRA08N	DRA08N-20190213-18-56	18"-18"	2/13/2019	FS		0.018	5.64	10.1	24.5	20	1070		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
DRA08S	DRA08S-20190205-18-56	18"-18"	2/5/2019	FS		0.087	5.75	14.2	20.1	23.6	2250		0.0016 U	0.0014 JQ	0.0026 JQ	0.0016 U	0.0008 U	
DRA08S	DRA08S-20190205-18-57	18"-18"	2/5/2019	FD		0.085	5.49	13.4	19.6	20.9	2110		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
DRA09	DRA09-20190117-24-56	24"-24"	1/17/2019	FS		0.045	5.94	11.7	22.5	19	835		0.0016 U	0.0019 JQ	0.0022 JQ	0.0016 U	0.0008 U	
EAS07	EAS07-20190115-36-56	36"-36"	1/15/2019	FS		4.8	5.09	9.33	24.8	17.7	1140		0.0044	0.0039 JQ	0.0057	0.0016 U	0.0025 JQ	
EAS08	EAS08-20190114-46-56	46"-46"	1/14/2019	FS		25	8.72	17.6	257	28.9	2330		0.014	0.037	0.067	0.0092	0.04	
FJD04-01	FJD04-01-20190201-36-56	36"-36"	2/1/2019	FS		0.187	4.63	7.07	116	14.4	1150		0.0016 U	0.001 U	0.0024 JQ	0.0016 U	0.0008 U	
FJD04-02	FJD04-02-20190213-48-56	48"-48"	2/13/2019	FS		0.22	4.08	6.12	27.4	6.8	1310		0.0016 U	0.0016 JQ	0.0023 JQ	0.0016 U	0.0017 JQ	
FJD04-03	FJD04-03-20190128-36-56	36"-36"	1/28/2019	FS		3.1	4.98	5.89	33.4 B	11.8	914		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
FJD04-04	FJD04-04-20190205-48-56	48"-48"	2/5/2019	FS		0.029	4.45	7.81	66.1	12.4	1070		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
FJD04-05	FJD04-05-20190122-36-56	36"-36"	1/22/2019	FS		2.51	7.75	25.3	8.37	8	841		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
FJD04-06	FJD04-06-20190122-36-56	36"-36"	1/22/2019	FS		0.034	6.48	6.31	8.17	6.71	1380		0.0016 U	0.001 U	0.0012 U	0.0016 U	0.0008 U	
FJD04-07	FJD04-07-20190107-36-56	36"-36"	1/7/2019	FS		2.7	3.22	4.87	26.6	7.42	990		0.0025 JQ	0.0028 JQ	0.0034 JQ	0.0016 U	0.003 JQ	
FJD04-08	FJD04-08-20190114-46-56	46"-46"	1/14/2019	FS		7.7	6.17	9.99	59.9	17.1	1480		0.0016 U	0.0014 JQ	0.0026 JQ	0.0016 U	0.0021 JQ	

Notes:

FS - Field Sample

FD - Field Duplicate

NP - Not Published

mg/kg - milligrams per kilogram.

" - Inches

H - High bias

J - The identification of the analyte is acceptable; the reported value is an estimate

K - Unknown bias

L - Low bias

Q - Detected below the quantitation limit

U - Analyte not detected

Bold - Value exceeds the detection limit for specific sample analyte

Highlighted value exceeds the Cleanup level for the specific sample analyte



TCEQ Interoffice Memorandum

To: Ms. Anne Marie Callery, Manager
Registration and Reporting Section (Mail Code MC-129)
Permitting and Registration Support Division

Thru: Ms. Merrie Smith, Manager
VCP-CA Section, Remediation Division

Mr. Richard Scharlach, Team Leader
Team 3, VCP-CA Section, Remediation Division

From: Eleanor Wehner, Project Manager
Team 3, VCP-CA Section, Remediation Division

Date: 9/27/2019

Subject: **Request for Administrative Closure of Industrial and Hazardous Waste Registration (SWR No. 80951)**
Former F. J. Doyle Salvage property located at 305 East Cottonwood Street (905 N. Poplar Street), Leonard (Fannin County), TX; TCEQ SWR No. 80951; EPA ID No. TXD980865109; Customer No. CN600359095; Regulated Entity No. RN100649227

The former F.J. Doyle (FJ Doyle) transformer salvage site located in Leonard (Fannin County) is currently registered as an inactive industrial solid waste generator (SWR No. 80951). The facility previously conducted salvage operations by stripping out-of-service power transmission transformers for recoverable metals from 1974 to 1999. The site was also used as a vehicle repair and tire shop up until 2006 when all operations reportedly ceased.

The Registration and Reporting Section received notification of the closure of the facility on April 27, 2006. The request to close the registration was referred to the VCP-CA Section on April 27, 2006. A copy of the current Notice of Registration (NOR) and April 2006 NOR closure request associated with the facility are attached for reference.

Efforts by the VCP-CA Section to obtain the required closure documentation from the generator since our receipt of the referral request have been unsuccessful. The VCP-CA Section requested the assistance of the US Environmental Protection Agency (US EPA) Region 6 RCRA program and local TCEQ Region office 4 office in November 2016 to determine the current regulatory status of the facility. Representatives of the US EPA Region 6 RCRA program internally referred the case to the US EPA Region 6 Emergency Management Branch (EMB) for review and the case was eventually accepted into their removal's program to initiate follow up actions. The US EPA performed an environmental assessment and time critical removal of industrial and hazardous wastes and contaminated media at the site and impacted off-site areas between April 2018 and February 2019. US EPA Region 6 EMB also documented the removal and restoration actions in a *Removal Action Report* issued August 2019.

Based on our review of the EPA's August 2019 *Removal Action Report* and supporting information in our files, the following waste streams and waste management units (WMUs) associated with the facility's Notice of Registration (NOR) have been properly closed in accordance with the requirements of 30 Texas Admin. Code (TAC) §335.8:

Waste Streams:

- Texas Waste Code 00012061: Used oil from non-PCB Transformers;
- Texas Waste Code 00023041: Ash residue from furnace used to remove varnish from copper wire; and,
- Texas Waste Code 00039012: General plant refuse from office and shop.

Waste Management Units:

- 001: Concrete pad used for the storage of miscellaneous storage containers stored on concrete pad;
- 002: Thermal processing unit; and,
- 003: Dumpster

Please amend the NOR (SWR No. 80951) associated with this facility to reflect closure of all waste streams, WMUs and closure of the registration. No further action is required for this facility in response to 30 Texas Administrative Code (TAC) §335.8.

Please direct any questions regarding this request to Eleanor Wehner of my staff at (512) 239-6542, Mail Code MC-127.



Merrie Smith, Manager

Enclosures: Copy of current NOR SWR No. 80951 FJ Doyle (September 27, 2019)

Copy of April 27, 2006 *Registration and Reporting Action Request* submitted by representatives of the Industrial and Hazardous Waste Registration Team, Registration and Reporting Section to the Remediation Division, Corrective Action Section

EW/mdh

cc: Ms. Erin Gorman, Waste Section Manager, TCEQ Region 4 Office, Dallas

*** Texas Commission on Environmental Quality ***
Notice of Registration
Industrial and Hazardous Waste

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9/27/2019

80951 F J DOYLE

Solid Waste Registration #: 80951 EPA ID: TXD980865109 CN: CN600359095 RN: RN100649227

Company Name: F J DOYLE SALVAGE TRANSFORMERS Region: 4 Initial Registration Date: 07/21/1993

Site Name: F J DOYLE County: 147 FANNIN Last Amendment Date: 04/24/2006

Site Location: 305 E COTTONWOOD ST, LEONARD, TX Land Type: PRIVATE Last Update Date: 04/27/2006

Primary Contact: DOYLE, F Title: ENVIRONMENTAL MANAGER

Mailing Address: PO BOX 312 LEONARD, TX 75452-0312 UNITED STATES Phone: 903 - 587-3342

Registration Status: CLOSURE REQUEST HW Permit: IW Permit: MW Permit:

Registration Type: GENERATOR,TRANSPORTER

Generator Type:

Hazardous Waste Generation Type:

Receiver Type:

Transporter Business Type: Transport own waste only

Transporter Waste Class: 1

This registration has the following merged registrations:

NAICS Code:

Tax ID: 0

Owner Information

Name: F J DOYLE SALVAGE TRANSFORMERS
Phone: 903 - 587-3342
Address: PO BOX 312
LEONARD, TX 75452-0312, UNITED STATES

Operator Information

Name:
Phone:
Address:

Billing Contact:
Billing Address:

Title:
Phone:

As of - 04/24/2006 The next unassigned sequence number for WASTES is 0004

The next unassigned sequence number for UNITS is 004

80951 F J DOYLE

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Waste Status Code Change Date	Mixed Radioactive	TCEQ Audit Complete	Waste Update Date	Inactive Reason
***** Active Wastes *****							
00012061	1	Active		N	No	9/8/11	
Waste Description: Used oil from non-PCB Transformers being scrapped out for salvage; initial generation: 1/86 Date of Generation: 7/27/93 Texas Form Code: 206 - Waste oil EPA Form Code: EPA Hazardous Waste Numbers: None Current Management Units: 22 - Miscellaneous Storage Containers: 001, OFF-SITE System Types: Origin Codes: 3 - Derived from on-site management of a nonhazardous waste NAICS Code: New Chemical Substance: N							
00023041	1	Active		N	No	9/8/11	
Waste Description: Ash residue from furnace used to remove varnish from copper wire; initial generation: 1/86 Date of Generation: 7/27/93 Texas Form Code: 304 - Other 'dry' ash, slag or thermal residue EPA Form Code: EPA Hazardous Waste Numbers: None Current Management Units: 08 - Thermal Processing Unit, other than Incinerator: 002, OFF-SITE System Types: Origin Codes: 3 - Derived from on-site management of a nonhazardous waste NAICS Code: New Chemical Substance: N							
00039012	2	Active		N	No	9/8/11	
Waste Description: General plant refuse from office and shop Date of Generation: 7/27/93 Texas Form Code: 901 - Plant production refuse EPA Form Code: EPA Hazardous Waste Numbers: None Current Management Units: 22 - Miscellaneous Storage Containers: 003, OFF-SITE System Types: Origin Codes: 1 - Generated on-site from a product process or service activity NAICS Code: New Chemical Substance: N							

80951 F J DOYLE

**** UNITS AT THIS SITE MANAGING WASTE ****

WMU Sequence Number	Unit Capacity	Capacity UOM	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
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** 'Active', 'Closure Pending' & 'Closure Request' Units **

001			CLOSURE REQUEST	4/24/06			9/14/11	
	Unit Type:	Miscellaneous Storage Containers						
	Unit Regulatory Status:	05 Non-Hazardous Regulated						
	Unit Description:	Various storage containers 1 x375 gallon, 2 x 500 gallon and 55 gallon drums. Stored on concrete pad						
	Billing Class:							
	System Type Cd:	141 Storage						
	Wastes Currently Managed in Unit:	00012061 Used oil from non-PCB Transformers being scrapped out for salvage; initial generation: 1/86						
	Wastes Previously Managed in Unit:	None						

002			CLOSURE REQUEST	4/24/06			9/14/11	
	Unit Type:	Thermal Processing Unit, other than Incinerator						
	Unit Regulatory Status:	05 Non-Hazardous Regulated						
	Unit Description:	High temperature oven to burn varnish off copper						
	Billing Class:							
	System Type Cd:	010 Metals recovery including retorting, smelting, chemical, etc.						
	Wastes Currently Managed in Unit:	00023041 Ash residue from furnace used to remove varnish from copper wire; initial generation: 1/86						
	Wastes Previously Managed in Unit:	None						

003			CLOSURE REQUEST	4/24/06			9/14/11	
	Unit Type:	Miscellaneous Storage Containers						
	Unit Regulatory Status:	05 Non-Hazardous Regulated						
	Unit Description:	Dumpster, 4 yd for accumulation of plant trash						
	Billing Class:							
	System Type Cd:	141 Storage						
	Wastes Currently Managed in Unit:	00039012 General plant refuse from office and shop						
	Wastes Previously Managed in Unit:	None						

MDS
de ✓

REGISTRATION AND REPORTING
Action Request Form

T/F/IHW 80951 CO
WWC COMM# 12000388 RP
PROJ. MGR. j.sirtz

To:	<u>Chris Siegel</u> <i>oos</i> Corrective Action Section/ MC 127 Remediation Division
FROM:	<u>CAROL GENSWEIDER</u> , Staff Industrial and Hazardous Waste Registration Team Registration and Reporting Section Registration, Review and Reporting Division Mail Code 129 Telephone 239- <u>6861</u>
DATE:	<u>4-27-06</u>
RE:	Request to Close a Waste Management Unit (WMU) and/or Notice of Registration SWR # <u>80951</u>

The Registration and Reporting Section has received the attached correspondence requesting to close a WMU or a facility. All non-closure updates have been addressed.

List of WMU(s) for Closure or R&R Staff Comments:

3 waste management units need closure.

Thanks
Carol G.

Received
MAY 02 2006
Remediation
Cor...

MA

April 24, 2006

IHW 30951 CO

Texas Commission On Environmental Quality
IHW Registration Team

To Whom It May Concern,

This is to inform you that FJ Doyle Salvage Transformers has not been in operation since 1999. I wish to also inform you that Mr. Doyle passed away on March 22nd of this year. I doubt that Mr. Doyle had filed a Solid Waste Registration form since 1999 and if he did, I feel sure he would have informed you that he had closed the business and retired. Either way, this application or registration is no longer applicable.

Received

MAY 02 2006

Remediation
Corrective Action

APR 27 2006

Registration and Reporting Section

CCG
IHW-4
1/27/06
2695

*** Texas Commission on Environmental Quality ***
Notice of Registration
Industrial and Hazardous Waste

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80951 F J DOYLE

Solid Waste Registration #: 80951 EPA ID: TXD980865109 CN: CN600359095 RN: RN100649227

Company Name: F J DOYLE SALVAGE TRANSFORMERS Region: 4 Initial Registration Date: 07/21/1993

Site Name: F J DOYLE County: 147 FANNIN Last Amendment Date: 09/27/2019

Site Location: 305 E COTTONWOOD ST, LEONARD, TX Land Type: PRIVATE Last Update Date: 10/24/2019

Primary Contact: DOYLE, F Title: ENVIRONMENTAL MANAGER

Mailing Address: PO BOX 312 Phone: 903 - 587-3342
LEONARD, TX 75452-0312 UNITED STATES

Registration Status: CLOSED HW Permit: IW Permit: MW Permit:

Registration Type: GENERATOR,TRANSPORTER

Generator Type:

Hazardous Waste Generation Type:

Receiver Type:

Transporter Business Type: Transport own waste only

Transporter Waste Class: 1

This registration has the following merged registrations:

NAICS Code:

Tax ID: 0

Owner Information

Operator Information

Name: F J DOYLE SALVAGE TRANSFORMERS
Phone: 903 - 587-3342
Address: PO BOX 312
LEONARD, TX 75452-0312, UNITED STATES

Name:
Phone:
Address:

Billing Contact:

Billing Address:

Title:

Phone:

As of - 09/27/2019 The next unassigned sequence number for WASTES is 0004

The next unassigned sequence number for UNITS is 004

80951 F J DOYLE

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Waste Status Code Change Date	Mixed Radioactive	TCEQ Audit Complete	Waste Update Date	Inactive Reason
***** No Longer Generated Wastes *****							
00012061	1	Inactive		N	No	9/27/19	
Waste Description: Used oil from non-PCB Transformers being scrapped out for salvage; initial generation: 1/86 Date of Generation: 7/27/93 Texas Form Code: 206 - Waste oil EPA Form Code: EPA Hazardous Waste Numbers: None Current Management Units: None System Types: Origin Codes: 3 - Derived from on-site management of a nonhazardous waste NAICS Code: New Chemical Substance: N							
00023041	1	Inactive		N	No	9/27/19	
Waste Description: Ash residue from furnace used to remove varnish from copper wire; initial generation: 1/86 Date of Generation: 7/27/93 Texas Form Code: 304 - Other 'dry' ash, slag or thermal residue EPA Form Code: EPA Hazardous Waste Numbers: None Current Management Units: None System Types: Origin Codes: 3 - Derived from on-site management of a nonhazardous waste NAICS Code: New Chemical Substance: N							
00039012	2	Inactive		N	No	9/8/11	
Waste Description: General plant refuse from office and shop Date of Generation: 7/27/93 Texas Form Code: 901 - Plant production refuse EPA Form Code: EPA Hazardous Waste Numbers: None Current Management Units: None System Types: Origin Codes: 1 - Generated on-site from a product process or service activity NAICS Code: New Chemical Substance: N							

80951 F J DOYLE

**** UNITS AT THIS SITE MANAGING WASTE ****

WMU Sequence Number	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Onsite/Offsite Waste Classes in Unit	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
** 'Inactive', 'Closed', 'Post Closure Care', 'Never Built' & 'Not Required' Units **									
001			CLOSED	9/27/19				9/27/19	
	Unit Type:		Miscellaneous Storage Containers						
	Unit Regulatory Status:		05 Non-Hazardous Regulated						
	Unit Description:		Various storage containers 1 x375 gallon, 2 x 500 gallon and 55 gallon drums. Stored on concrete pad						
	Billing Class:								
	System Type Cd:		141 Storage, bulking, and/or transfer off-site with no reclamation, recovery, destruction, treatment or						
	Wastes Currently Managed in Unit:		None						
	Wastes Previously Managed in Unit:		00012061						
002			CLOSED	9/27/19				9/27/19	
	Unit Type:		Thermal Processing Unit, other than Incinerator						
	Unit Regulatory Status:		05 Non-Hazardous Regulated						
	Unit Description:		High temperature oven to burn varnish off copper						
	Billing Class:								
	System Type Cd:		010 Metals recovery including retorting, smelting, chemical, etc.						
	Wastes Currently Managed in Unit:		None						
	Wastes Previously Managed in Unit:		00023041						
003			CLOSED	9/27/19				9/27/19	
	Unit Type:		Miscellaneous Storage Containers						
	Unit Regulatory Status:		05 Non-Hazardous Regulated						
	Unit Description:		Dumpster, 4 yd for accumulation of plant trash						
	Billing Class:								
	System Type Cd:		141 Storage, bulking, and/or transfer off-site with no reclamation, recovery, destruction, treatment or						
	Wastes Currently Managed in Unit:		None						
	Wastes Previously Managed in Unit:		00039012						