



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 ♦ 1400 COLISEUM BLVD. 36110-2059

MONTGOMERY, ALABAMA 36130-1463

WWW.ADEM.STATE.AL.US

(334) 271-7700

JAMES W. WARR
DIRECTOR

DON SIEGELMAN
GOVERNOR

September 28, 2000

MEMORANDUM

TO: Stephen A. Cobb, Chief *[Signature]*
Hazardous Waste Branch
Land Division

FROM: Chip Crockett *VAC 9/28/00*
Industrial Facilities Section
Hazardous Waste Branch
Land Division

RE: **Evaluation of status under the RCRIS Corrective Action Environmental Indicator Event Codes (CA725 and CA750)**
Lee Brass
Anniston, Alabama
EPA I.D. Number: ALD 057 213 811

Facsimiles: (334)
Administration: 271-7950
General Counsel: 394-4332
Air: 279-3044
Land: 279-3050
Water: 279-3051
Groundwater: 270-5631
Field Operations: 272-8131
Laboratory: 277-6718
Mining: 394-4326
Education/Outreach: 394-4383

I. PURPOSE OF MEMO

This memo is written to formalize an evaluation of the status of Lee Brass in relation to the following corrective action event codes defined in the Resource Conservation and Recovery Information System (RCRIS):

- 1) Current Human Exposures under Control (CA725), and
- 2) Migration of Contaminated Groundwater under Control (CA750).

Concurrence by the Hazardous Waste Branch Chief is required prior to entering these event codes into RCRIS. Dating and signing at the appropriate location within Attachments 1 and 2 satisfies your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations.

II. HISTORY OF ENVIRONMENTAL INDICATOR EVALUATIONS AT THE FACILITY AND REFERENCE DOCUMENTS

This evaluation is the first evaluation for Lee Brass. An earlier environmental indicator



memorandum, dated September 30, 1999, was prepared but later rescinded by the Department. This evaluation supercedes the September 1999 evaluation.

III. FACILITY SUMMARY

The Lee Brass Company (Lee Brass), a division of Amcast Corporation, is located on Golden Springs Road near Anniston, Alabama. Lee Brass primarily manufactures brass and bronze components for the plumbing industry as well as some specialty applications. Lee's production process begins with the smelting of brass scrap to produce ingots. These ingots are remelted and cast into various components in one of three onsite foundry operations.

A RCRA Facility Assessment (RFA) was initiated by EPA Region 4 in 1990. A preliminary review (PR) and Visual Site Inspection (VSI) were conducted September 18-19, 1990 to identify and assess Solid Waste Management Units (SWMUs) and other Areas of Concern (AOCs). This assessment is summarized in the *Draft RFA Report*, dated December 11, 1991, prepared by A.T. Kearney (draft RFA). This report does not appear to have been finalized by EPA Region 4.

The draft RFA identified three SWMUs for which a RCRA Facility Investigation (RFI) was recommended. Another fourteen SWMUs and AOCs were identified for which A. T. Kearney recommended Confirmatory Sampling (CS). To date, a formal RFI or CS campaign has not been required by either the EPA or ADEM, presumably due to the lack of a final RFA.

IV. CONCLUSION FOR CA725

As discussed in Attachment 1, the appropriate status code of the RCRIS Human Exposures Controlled Environmental Indicator code (CA 725) is "IN," indicating that additional information is required.

V. CONCLUSION FOR CA750

As discussed in Attachment 2, the appropriate status code of the RCRIS Groundwater Releases Controlled Environmental Indicator code (CA 750) is "IN," indicating that additional information is required.

VI. SUMMARY OF FOLLOW-UP ACTIONS

As discussed in Section III above, the RFA for the Lee Brass facility, initiated in 1991, has not been finalized. A second RFA is tentatively projected for fiscal year 2001. Following the conclusion of the RFA, additional investigations will be required as determined appropriate.

VHC: \\0015453597\EIs\Lee Brass EI Memo

Attachments: 1. CA725: Current Human Exposures under Control
2. CA750: Migration of Contaminated Groundwater under Control

cc: Dave Davis, Hazardous Waste Branch-ADEM
Ron Shell, Hazardous Waste Branch-ADEM
Prudence Cash, Office of General Counsel-ADEM
Doug McCurry, EPA Region 4

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRIS Code (CA725)

Current Human Exposures under Control

Facility Name: Lee Brass Company
Facility Address: 1800 Golden Springs Road, Anniston, Alabama
Facility EPA ID #: ALD 057 213 811

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMUs), Regulated Units (RUs), and Areas of Concern (AOCs)), been considered in this EI determination?

If yes - check here and continue with #2 below,

If no - re-evaluate existing data, or

If data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993 (GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in the RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **“contaminated”**¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

Media	Yes	No	?	Rationale/Key Contaminants
Groundwater				
Air (indoors) ²				
Surface Soil (e.g., <2 ft)				
Surface Water				
Sediment				
Subsurface Soil (e.g., >2 ft)				
Air (outdoors)				

_____ If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

_____ If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

_____ If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

¹ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above and adjacent to groundwater with volatile contaminants) does not present unacceptable risks.

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

<u>Summary Exposure Pathway Evaluation Table</u> Potential <u>Human Receptors</u> (Under Current Conditions)							
“Contaminated” Media	Residents	Workers	Day- Care	Construction	Trespassers	Recreation	Food ³
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface, e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. For Media which are not “contaminated” as identified in #2, please strike-out specific Media, including Human Receptors’ spaces, or enter “N/C” for not contaminated.
2. Enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have assigned spaces in the above table. While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

_____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

_____ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code

Rationale and Reference(s):

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

4. Can the exposures from any of the complete pathways identified in #3 be reasonably expected to be “significant”⁴ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s):

5. Can the “significant” exposures (identified in #4) be shown to be within acceptable limits?

_____ If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.

_____ If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code.

Rationale and Reference(s):

⁴ If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the **Lee Brass Company, EPA ID # ALD 057 213 811, located at 1800 Golden Springs Rd.; Anniston AL** under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

NO - "Current Human Exposures" are NOT "Under Control."

IN - More information is needed to make a determination.

Completed by: (signature) Vernon H. Crockett Date: 9/28/00
(print) Vernon H. Crockett
(title) Environmental Engineer

Supervisor: (signature) Stephen A. Cobb Date: 9/28/00
(print) Stephen A. Cobb
(title) Chief, Hazardous Waste Branch
(EPA Region or State) Alabama

Locations where References may be found: Alabama Department of Environmental Management
1400 Coliseum Blvd.; Montgomery, AL 36110

Contact telephone and e-mail numbers (name) Chip Crockett
(phone #) (334) 271-7747
(e-mail) vhc@adem.state.al.us

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: Lee Brass Company
Facility Address: 1800 Golden Springs Rd, Anniston, Alabama
Facility EPA ID #: ALD 057 213 811

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMUs), Regulated Units (RUs), and Areas of Concern (AOCs)), been considered in this EI determination?
- If yes - check here and continue with #2 below,
- If no - re-evaluate existing data, or
- If data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993 (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated groundwater and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in the RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Migration to Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

2. Is **groundwater** known or reasonably suspected to be “contaminated”⁵ above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?
- _____ If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.
- _____ If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”
- _____ If unknown - skip to #8 and enter “IN” status code.

Rationale and Reference(s):

3. Has the **migration** of contaminated groundwater **stabilized** such that contaminated groundwater is expected to remain within the “existing area of contaminated groundwater”⁶ as defined by the monitoring locations designated at the time of this determination?
- _____ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the “existing area of groundwater contamination”⁶.
- _____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the “existing area of groundwater contamination”⁶) - skip to #8 and enter “NO” status code, after providing an explanation.
- _____ If unknown - skip to #8 and enter “IN” status code.

Rationale and Reference(s):

⁵ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

⁶ “Existing area of contaminated groundwater” is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of “contamination” that can and will be sampled/tested in the future to physically verify that all “contaminated” groundwater remains within this area, and that the further migration of “contaminated” groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

**Migration to Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

4. Does "contaminated" groundwater discharge into surface water bodies?
- _____ If yes - continue after identifying potentially affected surface water bodies.
 - _____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
 - _____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration⁷ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature and number of discharging contaminants, or environmental setting) which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?
- _____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration⁷ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) providing a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
 - _____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration⁷ of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations⁷ greater than 100 times their appropriate groundwater "levels," providing the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identifying if there is evidence that the amount of discharging contaminants is increasing.
 - _____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

⁷ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

**Migration to Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁸)?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,⁹ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s):

⁸ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁹ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

Migration to Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

7. Will groundwater monitoring / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"
- If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."
 - If no - enter "NO" status code in #8.
 - If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).
- YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the **Lee Brass facility, EPA ID # ALD 057 213 811, located at 1800 Golden Springs Rd.; Anniston AL.** Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.
 - NO - Unacceptable migration of contaminated groundwater is observed or expected.
 - IN - More information is needed to make a determination.

Completed by: (signature) Vernon H. Crockett Date: 9/28/00
(print) Vernon H. Crockett
(title) Environmental Engineer

Supervisor: (signature) Stephen A. Cobb Date: 9/28/00
(print) Stephen A. Cobb
(title) Chief, Hazardous Waste Branch
(EPA Region or State) Alabama

Locations where References may be found: Alabama Department of Environmental Management
1400 Coliseum Blvd.; Montgomery, AL 36110

Contact telephone and e-mail numbers (name) Chip Crockett
(phone #) (334) 271-7747
(e-mail) vhc@adem.state.al.us