

Summary of Residential Soil Removal Action Work Plan

WALTER COKE

Collegetville & Harriman Park Neighborhoods

BACKGROUND

Surface soil at residential properties in the Collegetville, Harriman Park & Fairmont neighborhoods have been voluntarily sampled by Walter Coke on two separate occasions (2005, 2009) in cooperation with EPA. EPA concluded in 2005 that there was no unacceptable exposure and no further sampling was required at that time. The sampling in 2009 was for arsenic and seven polycyclic aromatic hydrocarbons (PAHs-measured as benzo(a)pyrene equivalents [BaP EQ]). Approximately 80% of the samples collected in 2009 were below EPA established cleanup levels. EPA concluded in August 2010 that some soil removal would be appropriate. EPA stated in a document it distributed to residents of these three neighborhoods in October of 2010: "EPA may never reach a final determination on all of the sources of the chemicals of potential concern found in the soil samples. This area of Birmingham has been the location of other industries that could also have contributed to the detected chemicals of potential concern. In addition, a number of non-industrial sources, such as car, railroad and airplane exhaust, residential application of pesticides or use of other household or yard products, or ashes from grilling or home heating could also have contributed to the detected chemicals of potential concern."

Walter Coke does not believe it is the source of the constituents detected in the soils, but to assist its neighbors and to avoid protracted litigation with EPA, Walter Coke is removing and replacing surface soil at 23 residential properties in Collegetville and Harriman Park whose soil samples exceed EPA-established clean-up values, set out below. No soil removal is being done in Fairmont because no yard exceeded EPA's established cleanup levels. This document is a summary of the removal plan approved by EPA.

CLEAN-UP VALUES

Sieved Arsenic	37 parts per million (ppm)
BaP EQ	1.5 ppm

PURPOSE

The purpose of this effort is to eliminate potential exposure to the constituents in the surface soils by removing them.

ACCESS FOR SOIL REMOVAL

No work will be done at these 23 properties until the owners and occupants grant permission in the form of an access agreement, which will be sent to the owners and occupants for approval and signature.

PROPERTY INSPECTION

Before work begins, Walter Coke will identify the area to be excavated and will locate any buried utilities in the area. Photographs of the area will be taken to document the condition and any plants, shrubs, trees, or structures (like a shed) will be catalogued. The owner/occupant can advise Walter Coke of any items that it would prefer not be disturbed or removed.

SOIL REMOVAL AND BACKFILL ACTIVITIES

Protective barriers will be placed around the items to be left undisturbed. Items that could get damaged (like fencing) will be removed, labeled, and secured. The excavation area(s) will be surrounded by high-visibility fencing to indicate the limits of the work areas. Designated yards and driplines will be excavated to 1 foot. Gardens will be excavated to 2 feet. Soil will be removed from the property using trackhoes, mini-excavators, or by hand digging, as needed. Although the plan is for the removed soil to be placed directly into trucks for transport to an authorized landfill, it is possible that the removed soil will have to remain on the property until approval is obtained for delivery to the landfill. Trucks will also be used to transport new fill to the property, and the new fill will be placed in the excavated area using mechanical equipment. Owners/occupants will have access to their homes at all times, but will not have access to the work areas until all work has been completed. Any excavated areas that must be left open overnight will be covered. Signs will be used to notify everyone that excavation is occurring on the property.

PROPERTY RESTORATION

Each excavated area will be restored as closely as possible to the conditions noted during the property inspection. Items removed from the property will be returned undamaged and re-installed to their proper location. Damaged items, if any, will be replaced with a similar item. Grassed areas will be re-sodded and plants, small trees, or shrubs will be replanted or replaced.

SCHEDULE

Begin process of obtaining access and needed approvals – June 27, 2011

Begin to prepare the properties for soil removal – August 1, 2011

Complete soil removal/restoration – November 4, 2011

CONTACTS

A copy of the full work plan can be obtained at the library listed below, or by contacting the representative of EPA or Walter Coke listed below:

NORTH BIRMINGHAM PUBLIC LIBRARY

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