May 4, 2009

Mr. Rick Bean, L.G.
Kansas Department of Health & Environment
Bureau of Remediation
1000 SW Jackson St, Suite 410
Topeka, Kansas 66612

Dear Mr. Bean:

Subject: Completion of Building Cleanout
Former EaglePicher Smelter
Galena, Kansas
CEC Project 061-825.0005

Civil & Environmental Consultants, Inc. (CEC) is pleased to provide our final report for the Interior Cleanout Contract of the Former EaglePicher Smelter Site. The services were completed in general accordance with our Building Cleanout Plan dated February 28, 2008 and subsequent Kansas Department of Health & Environment (KDHE) approval letter dated March 7, 2008. CEC was retained to oversee the cleanout services for the Warehouse Building, Manganese Dioxide Building, Manganese Sulfate Building and Transformer Building. Cleanout efforts were conducted between March and April 2008. A qualified CEC representative was onsite during cleanup activities to complete the following:

- Provide daily project monitoring;
- Collect confirmatory samples;
- Obtain a temporary hazardous waste generator identification number on behalf of the EaglePicher Custodial Trustee;
- Sign waste manifests as an agent for the generator; and
- Provide weekly progress reports and a final Building Cleanup Report to the KDHE.

FINAL

Civil & Environmental Consultants, Inc.

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DESCRIPTION OF WORK

Weekly progress reports were submitted to the KDHE detailing onsite cleanup work and waste removal efforts (see Weekly Progress Reports in Appendix A).

In the warehouse building, the remaining lead ore was removed and placed in super-sacs, labeled, and stored onsite. Fine ore residue was removed from the purlins and mezzazines using a Spencer Turbine HEPA vacuum and mechanized street sweeper and containerized in super-sacs with the coarse fraction of the ore (Photographs 1 and 2). Containerized ore residues from the warehouse are staged onsite and will be encapsulated onsite when contaminated soil is addressed.

The Manganese Dioxide Building was cleared of debris, the sludge-filled sumps were evacuated, cleaned, and the sump material was containerized in super-sacs for offsite disposal (Photographs 3 and 4). The evacuated sumps were filled to approximately 12 inches below grade with clean gravel and then concrete was poured to bring the sump areas to grade. Prior to offsite transportation, laboratory analysis, conducted by Trinity Analytical Laboratories, determined that the sludge was not hazardous and therefore could be transported offsite as such (see laboratory results in Appendix B). Air-dispersed residues were removed from structural steel, process equipment, walls, and the building floor using a Spencer Turbine HEPA vacuum and mechanized street sweeper and containerized in super-sacs. The super-sacs were then placed into Gaylord boxes, sealed, labeled as hazardous waste, and transported offsite. A total of 8.7 tons of non-hazardous materials were transported to the Prairie View Landfill in Lamar, Missouri (see waste manifests in Appendix C). A total of 25,000 pounds of hazardous material was transported to Clean Harbors Lone Mountain LLC in Waynoka, Oklahoma (see waste manifest in Appendix C).

Deposits of waste were removed from the purlins and mezzanines and the building floor in the Manganese Sulfate Building. Large crusted deposits were removed manually using knives, rakes and shovels, while the fine-particulate material on the purlins and the building floor was removed using a Spencer Turbine HEPA vacuum and mechanized street sweeper. Spent filters, as well as waste removed from the purlins and building floor, were containerized in super-sacs,

which were then placed into Gaylord boxes, sealed, labeled as hazardous waste, and transported offsite (Photograph 5). A total of 2,641 pounds of hazardous material was transported to Clean Harbors PPM LLC in Coffeyville, Kansas (see Certificate of Disposal in Appendix C).

The west wall of the Electrical Building was removed and the PCB transformer and associated electrical switch gear were removed (Photograph 6). One bird guano composite sample and seven concrete samples were collected from the PCB contaminated area and submitted to Pace Analytical in Lenexa for PCB analysis. All PCB sample results were less than 50 ppm. Laboratory results of those samples can be found in Appendix B dated March 19, 2008. The transformer and other PCB-contaminated equipment were staged onsite until removal was completed by Safety-Kleen. Deposits of bird guano from the purlins and mezzanines were removed and final demolition of the transformer building was completed. The remaining brick was transported to an approved construction and demolition waste disposal facility. A total of 4,041 kilograms of PCB liquid and 5,142 kilograms of non-DOT regulated debris and bird guano were transported to Clean Harbors PPM LLC in Coffeyville, Kansas (see Certificate of Disposal in Appendix C).

On April 12, 2008, a representative from Oglesby witnessed a release of sulfuric acid and rainwater breaching a secondary containment structure surrounding an empty acid tank which discolored the surrounding limestone gravel (Photograph 7 and 8). CEC notified the Kansas Department of Health and Environmental (KDHE) Spill Response Hotline and reported an estimated 50 gallons of dilute acid breached the containment and was subsequently neutralized. KDHE issued the Spill Number 30774 for future reference. Soda ash was obtained and applied to the contaminated structure and surrounding ground surface. Approximately 1,000 gallons of contaminant was evacuated from the secondary containment by Hillbilly Hauling & Pumping Inc. and transported and disposed of at their Joplin, Missouri treatment facility. In addition, eight 55-gallon drums of virgin sulfuric acid were evacuated from the sulfuric acid tanks by an industrial service contractor (Matrix Service) and transported to O'Brien Ready Mix in Parsons, Kansas (see Uniform Straight Bill Of Ladings in Appendix C). O'Brien Ready Mix used the sulfuric acid to clean concrete from the inside of their concrete mixer trucks.

SUMMARY

The building cleanout efforts at the former Eagle Picher smelter site in Galena, Kansas were completed in general accordance with the approved plan for the work. Collected waste materials were properly classified and disposed or stored for future inclusion in the onsite consolidation cell.

Please call if you have any questions after your review of this report.

Very truly yours,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Timothy E. Moberg
Assistant Project Manager

Martin C. Knuth, P.G.
Vice President

Enclosures

cc: W. West, EP Custodial Trustee
E. Bessey, Esquire
M. Coletta Gibbons, Esquire
S. Samuels, Esquire
D. Drake, USEPA, Region 7
J. Kloeckner, USEPA, Region 7
M. Cintron-Silva, USEPA Section Chief, Environment and Natural Resources Division

061-825-Task 0005-R-MAY4-09/W

APPENDIX A

WEEKLY PROGRESS REPORTS

March 18, 2008

Mr. Rick Bean, P.G.

Dear Mr. Bean:

Subject: Weekly Progress Report for the Former EaglePicher Smelter Site – Building Interior Decontamination
Week ending March 7, 2008
Galena, Kansas
CEC Project Number 061-825.005

Civil & Environmental Consultants, Inc. (CEC) retained Oglesby & Associates (Oglesby) to execute the following scope of general services:

- Remove lead ore from a catwalk in the Warehouse and stage the waste onsite for incorporation to the soil disposal area,
- Decontaminate walking surfaces in the Manganese Dioxide Building.
- Evacuate and dispose offsite sulfuric acid contained in tanks outside of the Manganese Dioxide Building.
- Remove and dispose offsite lead-containing residue on building structural steel and walking surfaces in the Manganese Sulfate Building.
- Remove and dispose offsite PCB electrical equipment and PCB-contaminated material. Raze the Electrical Building.

The methods to accomplish the above-listed tasks were provided to the Kansas Department of Health & Environment (KDHE) in a letter from CEC on February 28, 2008. With the concurrence of KDHE, decontamination activities were initiated on March 10, 2008.

During the week of March 10, 2008, Oglesby focused on preparatory work for decontamination including removing metal debris, junk equipment and other work-place physical hazards in the Manganese Dioxide and Manganese Sulfate Buildings. Preparations included using electrical disc grinders to eliminate steel protrusions from the concrete floor. Liquid-filled sumps in the Manganese Dioxide Building were evacuated and the liquid was containerized in 55-gallon drums pending waste profile analysis for offsite disposal. The evacuated sumps were filled to approximately 12-inches below grade with clean gravel. Concrete will be poured to bring the sump areas to grade.

To facilitate collecting concrete and bird guano samples from the floor, Oglesby removed the west wall of the Electrical Building and removed the PCB transformer and electrical switch gear. The equipment is staged onsite awaiting transport by Safety-Kleen to the Coffeyville, Kansas disposal facility. Oglesby submitted eight samples to Pace Analytical in Lenexa, Kansas for PCB analysis.

Proposed activities for the week of March 17, 2008 include loading PCB electrical equipment and PCB-contaminated material for offsite disposal and removal of lead ore from the Warehouse.

CEC continues to provide daily oversight and photographic documentation.

WEEKLY PROGRESS REPORT

To: Mr. Rick Bean, L.G.
Kansas Department of Health & Environment

cc: Mr. William West, Custodial Trustee

From: Robert E. McHale, P.G.
Civil & Environmental Consultants, Inc. (CEC)

Date: April 3, 2008

Subject: Weekly Progress Report for the Former EaglePicher Smelter Site – Building Interior Decontamination
Week Ending March 28, 2008
Galena, Kansas
CEC Project 061-825.0005

Civil & Environmental Consultants, Inc. (CEC) retained Oglesby & Associates (Oglesby) to execute the following scope of general services:

- Remove lead ore from a catwalk in the Warehouse and stage the waste onsite for incorporation to the soil disposal area,
- Decontaminate walking surfaces in the Manganese Dioxide Building.
- Evacuate and dispose offsite sulfuric acid contained in tanks outside of the Manganese Dioxide Building.
- Remove and dispose offsite lead-containing residue on building structural steel and walking surfaces in the Manganese Sulfate Building.
- Remove and dispose offsite PCB electrical equipment and PCB-contaminated material. Raze the Electrical Building.

The methods to accomplish the above-listed tasks were provided to the Kansas Department of Health & Environment (KDHE) in a letter from CEC on February 28, 2008. With the concurrence of KDHE, decontamination activities were initiated on March 10, 2008.

During the week of March 24, 2008, Oglesby focused on removing deposits of waste from the purlins in the Manganese Sulfate Building. Large crusted deposits of waste were manually removed using hand tools including putty knives, rakes and shovels. On March 26, 2008, Oglesby began removing fine-particle materials on the purlins using a Spencer Turbine HEPA vacuum. Spent filters, as well as waste removed from the purlins, were containerized in supersacs, which were then placed into a Gaylord box, sealed and labeled as Hazardous Waste for offsite disposal. The Gaylord boxes are staged within the building pending transport for offsite disposal. Periodically, an oil and sawdust-based floor sweep material was spread on the floor to minimize dust. The crew was outfitted in Level C personal protective equipment (PPE). CEC continues to provide daily project monitoring and photographic documentation.

As of March 28, 2008, Oglesby has reached the following completion milestones:

- Manganese Sulfate Building – 50% complete
- Manganese Dioxide Building – 80% complete
- Electrical Building – 50% complete
- Warehouse – 0% complete

PR-061-825.0005.AP3/W

WEEKLY PROGRESS REPORT

To: Mr. Rick Bean, L.G.
Kansas Department of Health & Environment

cc: Mr. William West, Custodial Trustee

From: Robert E. McHale, P.G.
Civil & Environmental Consultants, Inc. (CEC)

Date: April 10, 2008

Subject: Weekly Progress Report for the Former EaglePicher Smelter Site – Building Interior Decontamination
Week ending April 5, 2008
Galena, Kansas
CEC Project 061-825.0005

Civil & Environmental Consultants, Inc. (CEC) retained Oglesby & Associates (Oglesby) to execute the following scope of general services:

- Remove lead ore from a catwalk in the Warehouse and stage the waste onsite for incorporation to the soil disposal area,
- Decontaminate walking surfaces in the Manganese Dioxide Building.
- Evacuate and dispose offsite sulfuric acid contained in tanks outside of the Manganese Dioxide Building.
- Remove and dispose offsite lead-containing residue on building structural steel and walking surfaces in the Manganese Sulfate Building.
- Remove and dispose offsite PCB electrical equipment and PCB-contaminated material.
- Raze the Electrical Building.

The methods to accomplish the above-listed tasks were provided to the Kansas Department of Health & Environment (KDHE) in a letter from CEC on February 28, 2008. With the approval of KDHE, decontamination activities were initiated on March 10, 2008.

During the week of April 5, 2008, Oglesby focused on removing deposits of waste from the purlins and mezzanines in the Manganese Sulfate Building. Large crusted deposits of waste were manually removed using hand tools including putty knives, rakes and shovels. Fine-particle materials on the purlins were removed using a Spencer Turbine HEPA vacuum. Spent filters, as well as waste removed from the purlins were containerized in supersacs which were then placed into a Gaylord box, sealed and labeled as Hazardous Waste. The Gaylord boxes are staged within the building pending transport for offsite disposal. Periodically, an oil and sawdust-based floor sweep material was spread on the floor to minimize dust. All crew working in the exclusion zone were outfitted in Level C personal protective equipment (PPE). All crew working on aerial lifts or on the mezzanines were additionally equipped with safety harnesses tied off with a lanyard.

On April 5, 2008, Oglesby began removing the Transformer Building Roofing Panels. Roofing panels were stacked on pallets and stored onsite for future use on existing buildings. All crew working on the roof or on aerial lifts were outfitted in Level D PPE and were equipped with safety harnesses tied off with a lanyard.

CEC continues to provide daily project monitoring and photographic documentation.

As of April 5, 2008 Oglesby has reached the following completion milestones:

- Manganese Sulfate Building – 75% complete
- Manganese Dioxide Building – 80% complete
- Electrical Building – 75% complete
- Warehouse Building – 0% complete

WEEKLY PROGRESS REPORT

To: Mr. Rick Bean, L.G.
Kansas Department of Health & Environment

cc: Mr. William West, Custodial Trustee

From: Robert E. McHale, P.G.
Civil & Environmental Consultants, Inc. (CEC)

Date: April 18, 2008

Subject: Weekly Progress Report for the Former EaglePicher Smelter Site – Building Interior Decontamination
Week ending April 12, 2008
Galena, Kansas
CEC Project 061-825.0005

Civil & Environmental Consultants, Inc. (CEC) retained Oglesby & Associates (Oglesby) to execute the following scope of general services:

- Remove lead ore from a catwalk in the Warehouse and stage the waste onsite for incorporation to the soil disposal area,
- Decontaminate walking surfaces in the Manganese Dioxide Building.
- Evacuate and dispose offsite sulfuric acid contained in tanks outside of the Manganese Dioxide Building.
- Remove and dispose offsite lead-containing residue on building structural steel and walking surfaces in the Manganese Sulfate Building.
- Remove and dispose offsite PCB electrical equipment and PCB-contaminated material.
- Raze the Electrical Building.

The methods to accomplish the above-listed tasks were provided to the Kansas Department of Health & Environment (KDHE) in a letter from CEC on February 28, 2008. With the approval of KDHE, decontamination activities were initiated on March 10, 2008.

During the week ending April 12, 2008, Oglesby continued removing deposits of material from the purlins and mezzanines in the Manganese Sulfate Building and the Warehouse. As of April 12, 2008, approximately 20 4 x 4 foot gaylords of material have been stated and serviced onsite. Doe Run, a Missouri smelter, has expressed interest in purchasing the recovered material with high metals concentrations. Demolition of the Transformer Building was completed and the brick transported to an approved construction and demolition waste disposal facility. On April 7, 2008, Bryant Burnett of the USEPA visited the site in a non-official capacity.

On April 12, 2008, a release of low pH stormwater was observed emanating from a secondary containment structure for an empty sulfuric acid tank. Limestone gravel surrounding the tank was discolored. Ogleb

CEC continues to provide daily project monitoring and photographic documentation.

As of April 12, 2008 Oglesby has reached the following completion milestones:

- Manganese Sulfate Building – 95% complete
- Manganese Dioxide Building – 80% complete
- Electrical Building – 100% complete
- Warehouse Building – 70% complete

PR-061-825.0005.AP10/W

SUPPLEMENTAL PROGRESS REPORT

To: Mr. Rick Bean, L.G.
Kansas Department of Health & Environment

cc: Mr. William West, Custodial Trustee

From: Robert E. McHale, P.G.
Civil & Environmental Consultants, Inc. (CEC)

Date: April 18, 2008

Subject: Supplemental Progress Report for the Former EaglePicher Smelter Site
Building Interior Decontamination
Week Ending April 12, 2008
Galena, Kansas
CEC Project 061-825.0005

On Friday, April 11, 2008, Oglesby & Associates (Oglesby) completed decontamination activities for the week. Due to heavy rains slowing progress on April 11 and forecasted bad weather conditions for April 12, all personnel, including the Civil & Environmental Consultants, Inc. (CEC) representative, demobilized from the site. Reportedly, the Galena, Kansas area received over 2 inches of rain during the storm.

On Saturday, April 12, 2008, a representative from Oglesby was onsite performing an inspection of the property when a release of sulfuric acid and rainwater was observed breaching a secondary containment structure surrounding an empty acid tank. The mixture discolored the surrounding limestone gravel. Oglesby retrieved soda ash and applied it to the containment structure and the surrounding ground surface.

As the rain ceased, water levels in the containment structure receded below the level of the breach. On Monday, April 14, 2008, a CEC representative arrived onsite and observed the actions taken by Oglesby. CEC directed Oglesby to place a container beneath the source of the leak (estimated on Monday to be one drip per 10 seconds), and make arrangements for the containment to be evacuated and the contents disposed offsite. CEC also performed pH readings for the contained rainwater and determined the pH to be approximately 7.2 standard units (S.U.).

On Monday April 14, 2008, at approximately 1300 hours CST, CEC notified the Kansas Department of Health and Environment (KDHE) Spill Response Hotline. Based on information obtained from Oglesby, we reported that an estimated 50 gallons of dilute acid had breached the containment and was subsequently neutralized. We further reported that the rainwater within the containment would be pumped out and disposed offsite. KDHE issued the Spill Number 30774 for future reference.

Photographs of the release and mitigation efforts are attached. Additionally, recovered water from the secondary containment and virgin sulfuric acid from the adjacent tank is scheduled for offsite disposal during the week of April 14, 2008.

Enclosures

PR- 061-825.0005.AP14/W

WEEKLY PROGRESS REPORT

To: Mr. Rick Bean, L.G.
Kansas Department of Health & Environment

cc: Mr. William West, Custodial Trustee

From: Robert E. McHale, P.G.
Civil & Environmental Consultants, Inc. (CEC)

Date: April 24, 2008

Subject: Weekly Progress Report for the Former EaglePicher Smelter Site – Building Interior Decontamination
Week ending April 19, 2008
Galena, Kansas
CEC Project 061-825.0005

Civil & Environmental Consultants, Inc. (CEC) retained Oglesby & Associates (Oglesby) to execute the following scope of general services:

- Remove lead ore from a catwalk in the Warehouse and stage the waste onsite for incorporation to the soil disposal area.
- Decontaminate walking surfaces in the Manganese Dioxide Building.
- Evacuate sulfuric acid contained in tanks outside of the Manganese Dioxide Building and dispose offsite.
- Remove lead-containing residue on building structural steel and walking surfaces in the Manganese Sulfate Building and dispose offsite.
- Remove PCB electrical equipment and PCB-contaminated material and dispose offsite.
- Raze the Electrical Building and dispose offsite.

The methods to accomplish the above-listed tasks were provided to the Kansas Department of Health & Environment (KDHE) in a letter from CEC on February 28, 2008. With the approval of KDHE, decontamination activities were initiated on March 10, 2008.

During the week ending April 19, 2008, Oglesby continued removing deposits of material from the purlins and mezzanines in the Manganese Sulfate Building and the Warehouse. The majority of material removed during this week was accomplished using a HEPA vacuum. As of April 19, 2008, approximately 23 4 x 4 foot gaylords of material have been staged and serviced onsite. Doe Run, a Missouri smelter, has expressed interest in purchasing the recovered material with high metals concentrations. Oglesby has submitted a composite sample for total metals analysis to determine if the material has economic value.

On April 16, 2008, Ms. Nicole Cruise of the KDHE, was onsite to inspect progress. Ms. Cruise noted no deficiencies.

CEC continues to provide daily project monitoring and photographic documentation.

As of April 19, 2008 Oglesby has reached the following completion milestones:

- Manganese Sulfate Building – 95% complete
- Manganese Dioxide Building – 80% complete
- Electrical Building – 100% complete
- Warehouse Building – 90% complete

PR-061-825.0005.AP24/W

WEEKLY PROGRESS REPORT

To: Mr. Rick Bean, L.G.
Kansas Department of Health & Environment

cc: Mr. William West, Custodial Trustee

Subject: Weekly Progress Report for the Former EaglePicher Smelter Site – Building Interior Decontamination
Week ending April 26, 2008
Galena, Kansas
CEC Project 061-825.0005

Civil & Environmental Consultants, Inc. (CEC) retained Oglesby & Associates (Oglesby) to execute the following scope of general services:

- Remove lead ore from a catwalk in the Warehouse and stage the waste onsite for incorporation to the soil disposal area.
- Decontaminate walking surfaces in the Manganese Dioxide Building.
- Evacuate sulfuric acid contained in tanks outside of the Manganese Dioxide Building and dispose offsite.
- Remove lead-containing residue on building structural steel and walking surfaces in the Manganese Sulfate Building and dispose offsite.
- Remove PCB electrical equipment and PCB-contaminated material and dispose offsite.
- Raze the Electrical Building and dispose offsite.

The methods to accomplish the above-listed tasks were provided to the Kansas Department of Health & Environment (KDHE) in a letter from CEC on February 28, 2008. With the approval of KDHE, decontamination activities were initiated on March 10, 2008.

During the week ending April 26, 2008, Oglesby continued removing deposits of material from the purlins, mezzanines, walls, and floors in the Manganese Sulfate Building, Manganese Dioxide Building, and the Warehouse. The majority of material removed from the purlins, mezzanines, and walls during this week was accomplished using a HEPA vacuum. Material accumulated on the floors was removed using a mechanized street sweeper, brooms, and shovels. Material was containerized into supersacs, placed in gaylords, and staged onsite.

On April 24, 2008, Safety Kleen removed 240 gallons of non PCB fluid from the former electrical building transformer. Safety Kleen then rinsed and cleaned the transformer using a pump truck.

On April 24, 2008, Matrix Services, Inc. transferred approximately 400 gallons of sulfuric acid from the storage tanks located on the exterior of the Manganese Dioxide Building to 55 gallon barrels using a manifold style pump. Matrix Services, Inc. then rinsed and neutralized the tanks.

As of April 26, 2008 Oglesby has reached the following completion milestones:

- Manganese Sulfate Building – 100% complete
- Manganese Dioxide Building – 100% complete
- Electrical Building – 100% complete
- Warehouse Building – 100% complete

WEEKLY PROGRESS REPORT

To: Mr. Rick Bean, L.G.
Kansas Department of Health & Environment

cc: Mr. William West, Custodial Trustee

Subject: Weekly Progress Report for the Former EaglePicher Smelter Site – Building Interior Decontamination
Week ending May 3, 2008
Galena, Kansas
CEC Project 061-825.0005

Civil & Environmental Consultants, Inc. (CEC) retained Oglesby & Associates (Oglesby) to execute the following scope of general services:

- Remove lead ore from a catwalk in the Warehouse and stage the waste onsite for incorporation to the soil disposal area.
- Decontaminate walking surfaces in the Manganese Dioxide Building.
- Evacuate sulfuric acid contained in tanks outside of the Manganese Dioxide Building and dispose offsite.
- Remove lead-containing residue on building structural steel and walking surfaces in the Manganese Sulfate Building and dispose offsite.
- Remove PCB electrical equipment and PCB-contaminated material and dispose offsite.
- Raze the Electrical Building and dispose offsite.

The methods to accomplish the above-listed tasks were provided to the Kansas Department of Health & Environment (KDHE) in a letter from CEC on February 28, 2008. With the approval of KDHE, decontamination activities were initiated on March 10, 2008.

During the week ending May 3, 2008, Oglesby performed general site cleanup using a mechanized street sweeper to sweep the parking lot and a backhoe to stack scrap metal and empty trash into a dumpster. One of the neutralized and cleaned sulfuric acid tanks was removed from the site by Hillbilly Hauling and the non PCB transformer from the former Electrical Building was transported to a recycling center.

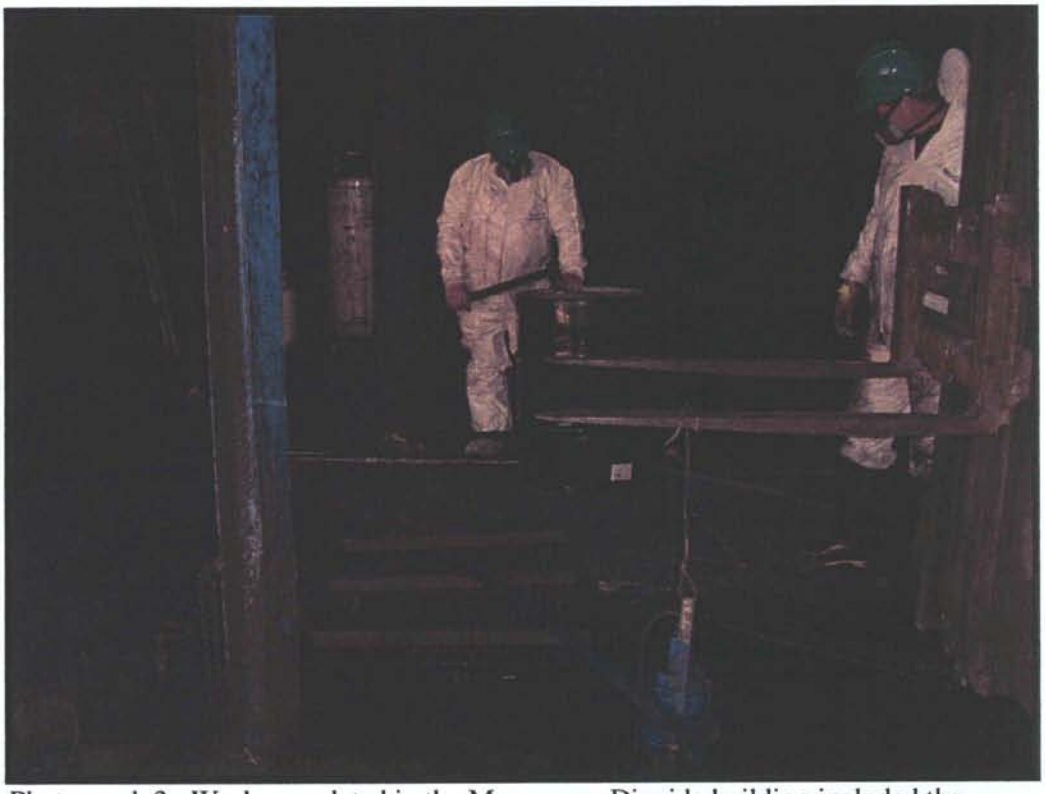
Material from the Manganese Dioxide Building and Manganese Sulfate Building is staged onsite and is awaiting approval from Doe Run for processing at a smelter. If the material is not approved, the material will be disposed of as hazardous. The pit sludge from the Manganese Dioxide Building has been classified as non hazardous and will be removed from the site this week. The sulfuric acid removed from the storage tanks located on the exterior of the Manganese Dioxide Building and stored in 55 gallon barrels will be removed this week.

On April 29, 2008, Mark Kohert, Robert Mchale, and Aaron Shear (CEC representatives), William West (Custodial Trustee), and Nicole Cruise (KDHE) performed a visual inspection of the completion of the building cleanout. All parties agreed that each building cleanout was completed.

PHOTOGRAPHS

Photograph 1: The warehouse clean out entailed using a Spencer Turbine HEPA vacuum to clean the waste off the purlins and mezzazines, placed in supersacs and then Gaylord boxes for offsite transport.

Photograph 2: Spencer Turbine HEPA vacuum utilized for cleaning purposes.

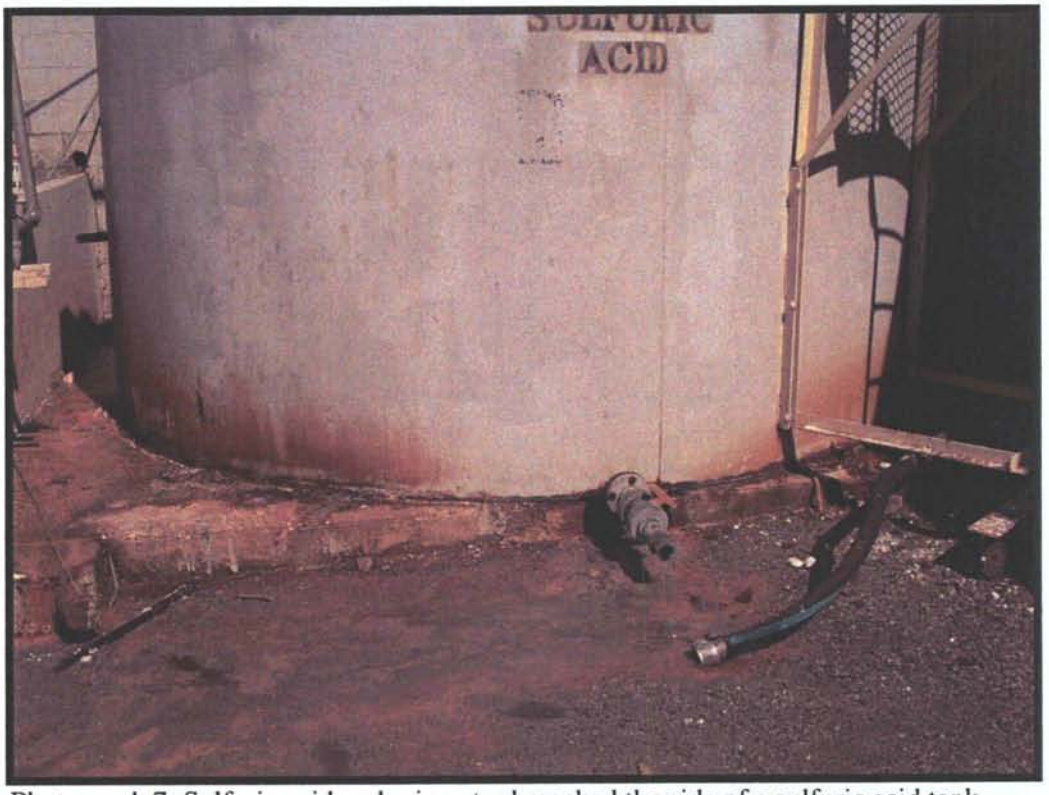


Photograph 3: Work completed in the Manganese Dioxide building included the excavation of liquid from sumps, storage into 55-gallon drums and transport offsite.

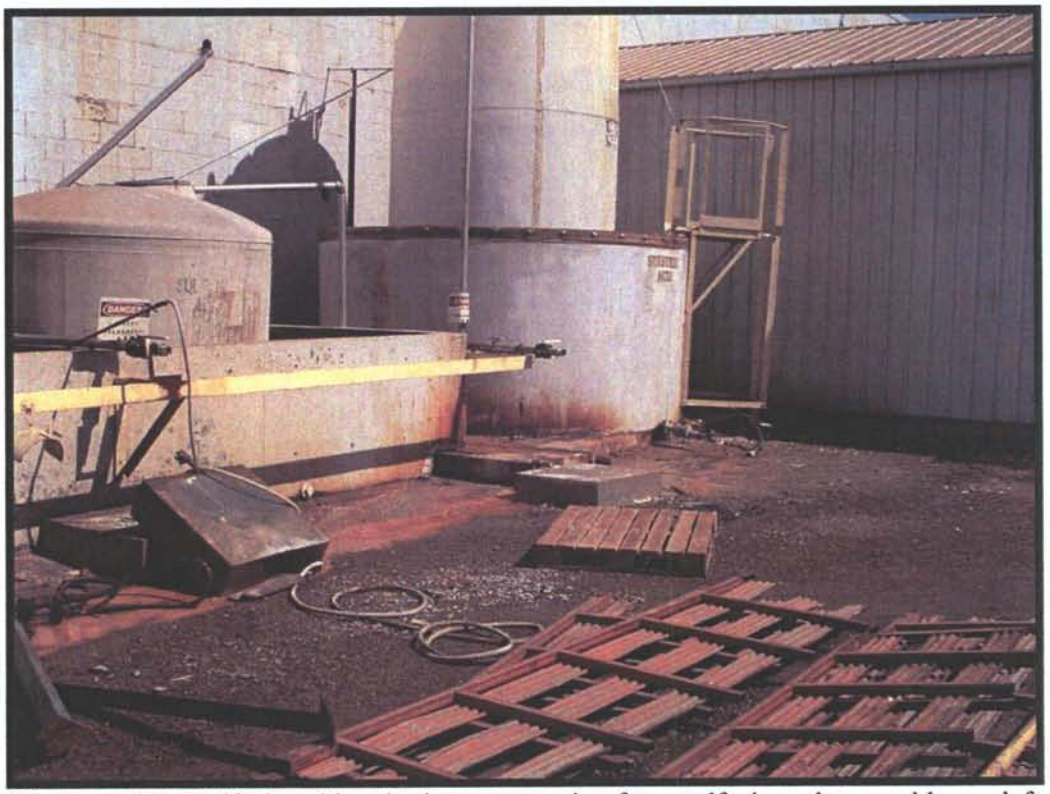
Photograph 4: In the Manganese Dioxide building the emptied sumps were backfilled with gravel and then brought to grade with concrete.

Photograph 5: Gaylord boxes were filled with spent supersacs and various contaminated waste was staged onsite for proper offsite disposal.

Photograph 6: PCB transformer and associated contaminated waste was packaged and labeled before being transported offsite for disposal.



Photograph 7: Sulfuric acid and rainwater breached the side of a sulfuric acid tank.



Photograph 8: Sulfuric acid and rainwater moving from sulfuric tank toward lower left corner of the photograph.