



State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL ASSESSMENT

JUN 05 2008

CERTIFIED – RETURN RECEIPT REQUESTED 7003 2260 0005 9326 2489

John P. Cleary, P.E.
Project Realty, L.L.C.
15313 West 95th Street
Lenexa, Kansas 66219

RE: No Further Action Notification
Former 7700 Earhart Blvd. Facility (aka Thompson Hayward Site); **AI Number 1275**
7700 Earhart Boulevard, New Orleans, Orleans Parish, Louisiana

Dear Mr. Cleary:

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has completed its review of your Remedial Activities and Site Closure Report (10/16/2007), Response to Comments – Remedial Activities and Site Closure Report (01/28/2008) and Remedial Activities and Site Closure Report Addendum No. 2 (03/06/2008) for the above referenced area of investigation located at 7700 Earhart Boulevard, New Orleans, Louisiana in Orleans Parish. Based on our review of these documents and all previously submitted information, we have determined that no further action is necessary at this time. The Basis of Decision for this notification is attached.

This letter also serves to certify that the provisions of the 1997 Cooperative Agreement between the LDEQ, Louisiana Department of Agriculture and Forestry (LDAF) and the responsible parties (T H Agriculture and Nutrition LLC and Elementis Chemical, Inc.) are hereby deemed satisfied. Therefore, in accordance with Section XXX of the Cooperative Agreement document, the Agreement terminates upon receipt of this letter by the responsible parties.

Be advised that no soils may be removed from this site without prior approval from LDEQ unless they are removed and disposed at a permitted disposal facility. Prior to the construction of enclosed structures over portions of the site impacted with volatile chemicals, further evaluation and approval from LDEQ is warranted.

If you have any questions or need further information, please call Edwin Akujobi at 225-219-3218.

Mr. John P. Cleary
Thompson Hayward Site - NFA
Page 2

Thank you for your cooperation in addressing this area.

Sincerely,



Keith L. Casanova, Administrator
Remediation Services Division

eca

Attachment BOD

c: Imaging Operations - IAS

Glenn Cavanaugh, Elementis Chemical Inc., P.O. Box 700, 329 Wyckoffs Mill Road,
Hightstown, NJ 08520

Larry LeJeune Pesticides and Environmental Programs, La. Dept. Of Agriculture P.O. Box
3596, Baton Rouge, LA 70821-3596

Kenneth P. Romero, Shaw Environmental, Inc., 4171 Essen Lane, Baton Rouge, LA 70809

BASIS OF DECISION FOR NO FURTHER ACTION

Thompson Hayward Site in New Orleans (aka 7700 Earhart Boulevard Facility)

AI Number 1275

7700 Earhart Boulevard, New Orleans, Orleans Parish, Louisiana

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has determined that The Thompson Hayward site, also known as 7700 Earhart Boulevard Facility, requires No Further Action At This Time (NFA-ATT).

The site consisted of an approximately 2.7-acre property located at 7700 Earhart Boulevard, New Orleans, Louisiana in Orleans Parish. It also included the public right-of-ways and the servitudes of all the streets contiguous with or adjacent to the site where contaminated soils/sediments, debris, etc., were suspected. According to site records, the property was used for pesticide formulation operations between 1940 and 1977. From 1977 to 1988, industrial activities on the site consisted of the bagging of soda ash material and the warehousing and distribution of several industrial chemicals that included dry cleaning fluids and commercial pest control products. All industrial/commercial activities ended on the site in 1988. Since then the property has remained unoccupied (i.e., 1988 – March, 2008).

Environmental activities at the site started in the late 1980s as a part of a response to a site-related release of dry-cleaning chemicals into the drainage system of the Sewerage and Water Board of New Orleans (SWBNO). Follow-up investigations revealed that the on-site soil media (i.e., surface and subsurface soil) was impacted with banned pesticides and dry-cleaning contaminants leading to an initial site remediation between 1989 and 1990. This remediation, which excluded areas suspected of having the most impacts at the site, involved the excavation and backfilling of significant sections of the site, demolition and off-site disposal of the former mixing building and all aboveground tanks, and the plugging of the sewer and drain lines exiting the property. The remediation of the excluded areas was delayed to afford the responsible parties enough time to find and employ appropriate technologies capable of addressing the perceived severity of the contaminated media.

In 1997, the LDEQ and Louisiana Department of Agriculture and Forestry (LDAF) entered into a cooperative agreement to address the difficulties presented by the excluded areas of the site and conclude the remediation of the site. The agreement stipulated a phased process towards meeting the remediation goal. The process included the performance of additional sampling and analyses of surrounding streets to supplement prior on-site data. The data from this sampling event were combined with those from past sampling activities to determine the nature and extent of the remaining contamination on the property and surrounding areas. A risk assessment conducted afterwards, and based on the assumption that the property's land use will remain industrial/commercial, was used to identify the contaminants of concern (COCs), the level of risk posed by the COCs present at both the facility and surrounding streets, and to determine the remedial action levels (RALs) to be used as the standard for the site's remediation. The RALs or remediation standards that were applied to this site are listed in the table that appears at the end of this BOD. They were based on a target carcinogenic risk level of 1×10^{-5} and a non-carcinogenic total hazard index of 1.0 (Risk Assessment, IT Corporation, October 2001). The risk assessment also used data generated during the performance of phase II Groundwater Quality Assessment

(Phase II GQA, IT Corporation – 1993) to classify the underlying surficial aquifer as a Ground Water 3 (GW-3), and concluded that it did not pose any risk to human health and the environment because it was neither used as a source of drinking water nor for any other beneficial purpose.

The risk assessment was followed by a Feasibility Study (FS) that explored several viable remediation technologies and recommended the most efficient alternative. Based on this study excavation and off-site disposal of contaminated media was recommended to, and accepted by, the LDEQ. The feasibility study was then followed by the design and implementation of the remedial alternative.

The accepted remedial alternative was implemented between October 2006 and August 2007. Site remediation activities entailed the excavation and off-site treatment/disposal of soil material; extraction and off-site disposal of contaminated sediment and water from two nearby storm drain lines; the demolition and removal of the on-site warehouse and finally the restoration of the soil at the property. As indicated above, remediation was conducted subject to site-specific remedial action levels developed during the risk assessment. Due to the proximity of commercial and residential dwellings to the site, the remediation was conducted in a manner that presented the least amount of impact to the safety of the public. Some of the instituted safety measures included the piece-by-piece demolition of the warehouse to reduce dust emission and the performance of soil excavation in an enclosed structure called the Enclosed Remedial Activities Building (ERAB). The ERAB was a 70'x90' engineered stress membrane structure that was fitted with a ventilation/air filtration system and other ancillary equipment to prevent or reduce remediation-related air emissions.

During the remediation phase, 751 tons of hazardous debris was disposed of by micro-encapsulation at the Clean Harbors facility in Lone Mountain, Oklahoma. Over 4800 tons of excavated soil, classified as hazardous waste, was disposed of by incineration at facilities located in both Deer Park, Texas and Kimball, Nebraska. About 5800 tons of construction and debris waste was disposed of as solid waste at the Riverbirch Landfill in Waggaman, Jefferson Parish, Louisiana. Also, approximately 111,000 gallons of site-related contact liquid was treated or disposed of at Clean Harbor facilities in Deer Park, Texas and Baton Rouge, Louisiana. No Further Action At This Time is granted when contamination is reduced to the extent necessary to achieve the established standards. The confirmatory sampling data, as indicated in the table below, confirmed that the remaining concentrations of the COCs have been reduced to levels that are below the approved remedial action levels. Also a new chain-link fence surrounds the facility to help limit unauthorized access. For a full detail of the remediation activities see the Remedial Activities and Site Closure Report and associated addendums (Shaw Environmental 2007 and 2008), which are on file at LDEQ Public Records Center.

In accordance with LAC 33:I. Chapter 13, if land use is going to be changed from industrial to non-industrial, the responsible party shall notify the LDEQ within thirty (30) days and the Thompson Hayward site shall be reevaluated to determine if conditions are appropriate for the proposed land use. Future use may dictate additional remedial activities. A conveyance notice has been filed with the Orleans Parish Clerk of Court noting that the site was closed under industrial standards. An inspection of the site was performed on March 31, 2008, confirming that all monitoring wells

have been plugged and abandoned and no investigation derived waste remains on site. No soils may be moved from this location without written authorization from the LDEQ unless they are removed and disposed at a permitted disposal facility.

The impacted media, constituents of concern, maximum concentration remaining on site, and the approved remediation standards established for this site are listed in the following table:

Constituent of Concern	Maximum Remaining Concentration (ppm)	Approved Remedial Action Levels (ppm) (Based on Risk Assessment)
Environmental Medium: Surface Soil (0 – 4.5 feet)		
Arsenic	7.71	13.98
Beryllium	0.902	1.0
Chromium	23	2783.9
4,4'-DDD	7.3	61.7
4,4'-DDE	0.93	61.7
4,4'-DDT	41	61.7
Aldrin	0.33	0.96
Alpha BHC	0.31	2.6
Chlordane	7.3	61.7
Dieldrin	0.72	1.02
Endrin	0.35	210.0
Gamma BHC (Lindane)	0.27	12.6
Heptachlor	0.12	3.64
Heptachlor Epoxide	0.53	1.8
Toxaphene	8.5	17.89

Constituent of Concern	Maximum Remaining Concentration	Approved Remedial Action Levels (Based on Risk Assessment)
Environmental Medium: Sub-surface Soil (0 – 10 feet)		
Beryllium	1.1	127.68
Chromium	24	11,599.58
4,4-DDD	120.0	1872.95
4,4-DDT	109.0	7712.14
Aldrin	70.0	87.74
Alpha BHC	7.9	324.96
Chlordane	8.6	1800.72
Dieldrin	21.0	127.95
Endrin	26.0	877.4
Gamma BHC (Lindane)	5.4	877.4
Heptachlor	6.6	454.95
Tetrachloroethene	3600.0	29246.79
Toxaphene	66.0	1861.16

Additional information on the details of the investigation and evaluation of this site may be obtained from LDEQ's Public Records Center located in the Galvez Building, Room 127, 602 N. Fifth Street, Baton Rouge, LA 70802. Additional information regarding the Public Records may be obtained by calling (225) 219-3168 or by emailing publicrecords@la.gov.

Photos of Thompson Hayward



Thompson Hayward site prior to remediation

Thompson Hayward site prior to remediation



Thompson Hayward site during remediation

Photos of Thompson Hayward



Thompson Hayward site after remediation

Thompson Hayward after remediation



Edwin Akujobi

From: LeJeune, Larry [larry_l@ldaf.state.la.us]
Sent: Monday, May 05, 2008 5:11 PM
To: Edwin Akujobi
Subject: NFA/BOD Thompson Hayward site, New Orleans

I concur with the NFA/BOD on the Thompson Hayward site.

KEANMILLER

KEAN MILLER HAWTHORNE D'ARMOND McCOWAN & JARMAN LLP
ATTORNEYS AT LAW

M. DWAYNE JOHNSON, PARTNER
(225) 382-3415, DIRECT FAX
DWAYNE.JOHNSON@KEANMILLER.COM

February 12, 2008

HAND DELIVERED

Mr. Keith Casanova, Administrator
Louisiana Department of Environmental Quality
Environmental Assessment Division
602 North Fifth Street
Baton Rouge, Louisiana 70802

Remediation Services Division
Manager: *Swiley*
Team Leader: *Arnyford*
AI #: *1275*
TEMPO Task #: _____
 Desk Copy File Room: *TAS*

RECEIVED
FEB 12 2008
LA DEPT. OF ENV. QUALITY
REMED. SERVICES DIVISION
LOG # *FY 2008 - 2800*

RE: Conveyance Notification (Closed AOC)
Former 7700 Earhart Boulevard Facility
New Orleans, Louisiana
Agency Interest No.: 1275

Dear Mr. Casanova:

On behalf of T H Agriculture and Nutrition (THAN) and Elementis Chemicals, Inc. (Elementis), formerly known as Harcos Chemicals, Inc., attached is an original certified copy of the Department-approved Conveyance Notification (Closed AOC) that was recorded in the Conveyance Records for the Parish of Orleans, Louisiana, on February 8, 2008, as Instrument No. 392229, along with three copies thereof.

Should you have any questions or require additional action on our part in connection with the attached Conveyance Notification, please do not hesitate to contact me. Thank you for your attention to this matter. Best regards.

Very truly yours,



M. Dwayne Johnson

MDJ/rg

cc: Edwin Akujobi, LDEQ
Jack Cleary, THAN
Kenneth P. Romero, P.G., Shaw

~~STAMP COPY~~

~~CERT. COPY~~

CONVEYANCE NOTIFICATION

(CLOSED AOC)

Elementis Chemicals Inc. (Elementis) hereby notifies the public that the following described Area of Concern (AOC) located at 7700 Earhart Boulevard, New Orleans, Louisiana, Agency Interest Number 1275 was closed with contaminant levels present that are acceptable for industrial/commercial use of the property as described in the December 4, 1997 Cooperative Agreement (Agreement) between T H Agriculture and Nutrition (THAN), Harcros Chemicals, Inc. (currently known as Elementis), and the Louisiana Department of Environmental Quality (LDEQ). If land use changes from industrial to non-industrial, the current landowner shall notify the LDEQ in writing within 30 days and the AOC shall be reevaluated to determine if conditions are appropriate for the proposed land use.

This AOC was closed in accordance with the aforementioned Agreement. Information regarding the AOC is available in the LDEQ public record and may be obtained by contacting the LDEQ Records Manager at (225) 219-3168. Inquiries regarding the contents of the AOC may be directed to the following address:

General Counsel
Elementis Chemicals, Inc.
P.O. Box 700
329 Wyckoffs Mill Road
Hightstown, New Jersey 08520

AOC Description is as follows:

A.

THAT CERTAIN PIECE OR PORTION OF GROUND, together with all the buildings and improvements thereon, and all the rights, ways, privileges, servitudes, appearances and advantages, and prescriptions, both liberative and acquisitive, thereunto belonging or in anywise appertaining, situated in the SQUARE NUMBER 461, bounded by Colapissa, Oleander, Lowerline (formerly Bernadette) and Pine (formerly Lowerline) Streets, and according to a sketch made by George H. Grandjean, Civil Engineer and Surveyor, dated September 23, 1899, annexed to a writ of seizure and sale in the suit of Lloyd Poety versus Matther Stepp, Number 69154 of the docket of the Civil District Court for the Parish of Orleans, said Square measuring 278 feet, 11 inches, 5 lines front of former Lowerline Street (now Pine Street); 240 feet, 6 inches, 3 lines front on former Bernadette Street (now Lowerline); 217 feet, 9 inches front on Colapissa Street, and 225 feet, 4 inches, 1 line front on Oleander Street, all more or less, divided into 23 lots on said sketch, and is the balance of the square 1913 of old Carrollton.

B.

THAT CERTAIN SQUARE OF GROUND, with all the buildings and improvements thereon, and all the rights, ways, privileges, servitudes, advantages, appurtenances, and prescriptions thereunto belonging or in anywise appertaining, situated in the Seventh District of this city, designated as SQUARE NUMBER 462, bounded by Oleander, Lowerline, Colapissa and Burdette Streets, and measures as follows: 79 feet, 3 inches, 2 lines front on Oleander Street; 123

JARIAL ARCHIVES OF ORLEANS PARISH
NA # 2008-13045 DT 02/08/08
TYPE: NOTIF FEE: \$20.00 PG: 5



feet, 11 inches, 2 lines front on Colapissa Street; 300 feet, 3 inches front on Burdette Street; 303 feet, 6 inches, 6 lines front on Lowerline Street.

LESS AND EXCEPT the property described in a deed under private signature, dated November 5, 1934, and registered in the Conveyance Office for the Parish of Orleans in COB 479 folio 521, which deed was created by Charles Taylor in favor of the Yazoo & Mississippi Valley Railroad Company, and wherein the said Charles Taylor sold and transferred to the Yazoo and Mississippi Valley Railroad Company certain property occupied and used as right-of-way, more particularly described as follows:

A CERTAIN TRACT OF GROUND, together with all the rights, ways, privileges, servitudes, advantages and appurtenances, and prescriptions thereunto belonging or in anywise appertaining, situated in the Seventh District of the City of New Orleans being in Square designated as SQUARE 462, bounded by Oleander, Lowerline, Colapissa and Burdette Streets, and more particularly described as follows:

Beginning at the intersection point of the north margin of Colapissa Street and the East margin of Burdette Street; thence Northwardly along the East margin of Burdette Street, a distance of 217.08 feet to a point on the South right-of-way line of the Y&MVRR; and being the Point of the Beginning, thence continue Northwardly along the East margin of Burdette Street, a distance of 83.17 feet to the Northwest corner of said square 462, thence Eastwardly along the South margin of Oleander Street, a distance of 79.25 feet to the Northeast corner of said Square 462; thence Southwardly along the West margin of Lowerline Street, a distance of 69.08 feet to the South right-of-way line of the Y&MVRR, thence in a Westerly direction along the South right-of-way line of the Y&MVRR, a distance of 91.22 feet to a point on the East Margin of Burdette Street, and being the Point of Beginning, it being the intention to herein convey all that part of said Square 462 lying North of the South right-of-way line of the Y&MVRR running through said square.

C.

A CERTAIN PORTION OF STREET AREA designated as Lowerline Street in the Seventh Municipal District, City of New Orleans, bounded by Colapissa Street, Square 462, Earhart Boulevard and Square 461, commencing at the intersection of the West property line of Earhart Boulevard and the South property line of Lowerline Street and thence measures 240 feet, 6 inches, 7 lines Southeasterly along the south line of Lowerline Street to a point on the East line of Colapissa Street, thence along the East line of Colapissa Street northwesterly, a distance of 50 feet, 6 inches, 5 lines to a point on the North line of Lowerline Street, a distance of 234 feet, 5 inches, 5 lines to a point on the West line of Earhart Boulevard, thence southeasterly along the West line of Earhart Boulevard, a distance of 50 feet, 00 inches 02 lines to the point of beginning. All as more fully shown on survey by P.C. Gandolfo, Jr., Surveyor, dated March 9, 1956.

Subject to servitude for utility purposes as granted in the act passed before Ivy A. Smith, Jr., City Notary, dated December 22, 1960, registered in COB 640 folio 40.

Being the same property acquired by Consolidated Electronics Industrial Corporation from Thompson-Hayward Chemical Company, a Missouri corporation, by an act passed before me, Notary, this day registered COB 630, folio 416.

EXCEPTIONS:

1. Servitude created in act before Ivy A. Smith, Jr., City Notary, dated December 22, 1960, registered in COB 640, folio 40, as follows:

“It is agreed by and between the parties hereto that the vendor does hereby retain a full width perpetual servitude over the entire street area herein conveyed for the present and future use of all utilities which are in this area or which may be located underground or overhead and which exist in this area at this time. It is further agreed that the City shall have access to this area at any time.”

2. M.O.B. 1914, Entry No. 552, Paving Ordinance, in the sum of \$48,960.40, (covering caption and other property) against Thompson-Hayward Chemical Company, in favor of the City of New Orleans, filed May 9, 1968, Ordinance No. 3800 M.C.S.
3. P.B. 1337, folio 51, Paving Lien in the sum of \$3,708.70, plus interest against Thompson-Hayward Chemical Co., in favor of the City of New Orleans, Department of Streets, filed May 29, 1970.

A table showing the relevant maximum constituent concentrations remaining in soil is also attached.

A scaled site plan showing the affected soil zones is attached as Figure 1.

Further information regarding remedial activities conducted at the above referenced site can be found within the *Remedial Activities and Site Closure Report (Shaw E&I, 2007)* on file at the following location:

LDEQ
Public Records Center
602 North 5th Street, Room 127
Baton Rouge, Louisiana
Viewing Hours: 8 – 4:30 M-F



Elementis Chemicals, Inc.

February 2008
Date

Maximum RAL Constituent Concentrations Remaining in Soil
7700 Earhart Boulevard
New Orleans, Louisiana
Agency Interest No. 1275

Sample Location/ID	Sample Date	Fraction	Parameter	CAS Number	RAL (mg/kg)	Maximum Result or 95% UCL Concentration (mg/kg)
Surface Soils						
NA**	06/25/89	Metal	ARSENIC	7440-38-2	13.98	7.71**
NA**	09/07/89	Metal	BERYLLIUM	7440-41-7	1	0.902**
S8-WALL-1	06/25/89	Metal	CHROMIUM*	7440-47-3	2783.9	23
EA-H-2	09/07/89					
EA-F-3	06/28/89	OCL Pesticide	4,4-DDD	72-54-8	61.7	7.3
EA-F-3	06/28/89	OCL Pesticide	CHLORDANE	57-74-9	57.62	0.3
GS16-3.5-1B-SO-CS	01/30/07	OCL Pesticide	4,4-DDE	72-55-9	61.7	0.93JP
S20-1C-3.5-SO-CS	03/01/07	OCL Pesticide	ALDRIN	309-00-2	0.96	0.33
GS16-3.5-1B-SO-CS	01/30/07	OCL Pesticide	DIELDRIN	60-57-1	1.02	0.72JP
EA-F-3	06/28/89	OCL Pesticide	4,4-DDT	50-29-3	61.7	41
GS16-3.5-1B-SO-CS	01/30/07	OCL Pesticide	ALPHA BHC	319-84-6	2.6	0.31J
S8-WALL-1	06/25/89	OCL Pesticide	GAMMA BHC (LINDANE)	58-89-9	12.6	0.27
EA-F-3	06/28/89	OCL Pesticide	TOXAPHENE	8001-35-2	17.89	8.5
GS16-3.5-1B-SO-CS	01/30/07	OCL Pesticide	ENDRIN	72-20-8	210.58	0.35J
SS-CC-1	06/07/89	OCL Pesticide	HEPTACHLOR	76-44-8	3.64	0.12
S20-1C-3.5-SO-CS	03/01/07	OCL Pesticide	HEPTACHLOR EPOXIDE	1024-57-3	1.8	0.53P
Subsurface Soils						
EA-C-1	06/23/89	Metal	BERYLLIUM*	7440-41-7	127.68	1.1
EA-C-2	06/23/89					
EA-F-5	07/31/89					
EA-G-2	08/16/89					
B9-5.0-1B-SO-CS	02/05/07					
EA-F-5	06/31/89	Metal	CHROMIUM*	7440-47-3	11599.58	24
EA-C-1	06/23/89					
GB7-1A-5.0-SO-CS	01/13/07	OCL Pesticide	4,4-DDD	72-54-8	1872.95	120
EA-D-3	08/15/89	OCL Pesticide	CHLORDANE	57-74-9	1800.72	8.6
S10-7A-1B-SO-CS	02/06/07	OCL Pesticide	ALDRIN	309-00-2	87.74	70
B27-1D-5.0-SO-CS	03/15/07	OCL Pesticide	DIELDRIN	60-57-1	127.95	21
EA-D-2	08/08/89	OCL Pesticide	4,4-DDT	50-29-3	7712.14	109
B27-1D-5.0-SO-CS	03/15/07	OCL Pesticide	ALPHA BHC	319-84-6	324.96	7.9J
S26-1D-7A-SO-CS	03/15/07	OCL Pesticide	GAMMA BHC (LINDANE)	58-89-9	877.4	5.4
EA-F-5	07/31/89	OCL Pesticide	TOXAPHENE	8001-35-2	1861.16	66
EA-D-3	08/15/89	OCL Pesticide	ENDRIN	72-20-8	877.4	26
EA-D-2	08/08/89	OCL Pesticide	HEPTACHLOR	76-44-8	454.95	6.6
S5A-2A-6.0A-SO-CS	05/03/07	Volatile	TETRACHLOROETHENE	127-18-4	29246.79	3600D

mg/kg: Milligrams per kilogram

NA: Not Applicable

OCL: Organochlorine

Qualifiers: D - Dilution factor applied

J - Estimated value below reporting limit

P - Denotes a 25% difference between chromatograph runs. The higher of the two values has been reported.

RAL: Remedial Action Level

Surface Soils: Classified as onsite soil 0 to 4.5 feet below ground surface.

Subsurface Soils: Classified as onsite soil 0 to 10 feet below ground surface.

UCL: upper confidence limit - USEPA Supplemental Guidance to RAGS: Calculating the Concentration Term, 1992

*maximum constituent concentration observed in multiple sample locations.

** 95% UCL concentration used

7700 EARHART BLVD. FACILITY
 NEW ORLEANS, LOUISIANA
 AGENCY INTEREST NO. 1275



FIGURE 1

MAXIMUM RAL CONSTITUENT
 CONCENTRATIONS REMAINING IN SOIL
 REMEDIATION ACTIVITIES REPORT



LEGEND
 (Symbol) SAMPLE LOCATION
 (Dashed line) 1990 EXCAVATION BOUNDARY
 (Solid line) 2007 EXCAVATION BOUNDARY

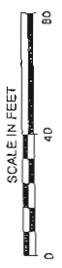
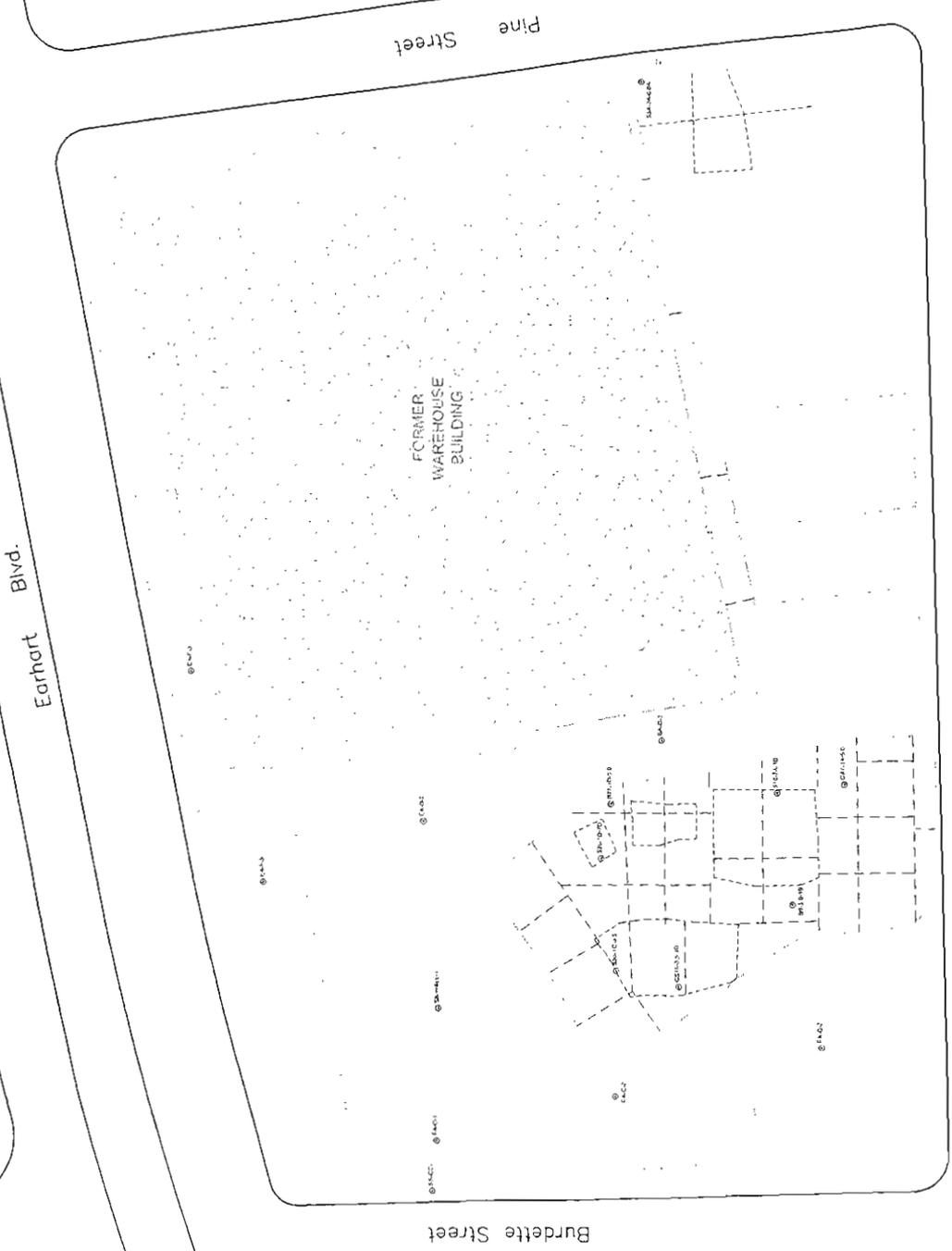


IMAGE	X-REF	OFFICE	BTR	DRAWN BY	CHECKED BY	APPROVED BY
				0 COMEAU	11/07/02	KPR
				SPO	1/28/08	1/28/08
						NUMBER
						123926-B23

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
FIELD INTERVIEW FORM**

AGENCY INTEREST#: 1275 INSPECTION DATE: 03/31/08 TIME OF ARRIVAL: 10:00 a.m.
 ALTERNATE ID#: _____ DEPARTURE DATE: 03/31/08 TIME OF DEPARTURE: 10:25 a.m.
(ID Type/Number)
 FACILITY NAME: Than Harcos (Thompson Hayward) PH #: _____
 LOCATION: 7700 Earhart Boulevard
New Orleans PARISH NAME: Orleans
 RECEIVING STREAM (BASIN/SUBSEGMENT): N/A

MAILING ADDRESS: _____
(Street/P.O. Box) (City) (State) (ZIP)
 FACILITY REPRESENTATIVE: _____ TITLE: _____
 FACILITY REPRESENTATIVE PHONE NUMBER: _____
 NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above): _____

INSPECTION TYPE: Post-Remediation PROGRAM INVOLVED: AIR WASTE WATER OTHER IAS

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

The soil cover at the site was observed to have healthy grass cover, which itself appeared to be well-maintained. No evidence of soil erosion or stressed vegetation was observed anywhere on the site. The surrounding (new) chain-link fence together with associated gates and locks were intact, secure and appear to be successful in preventing trespass into site and unauthorized dumping of trash. Finally, the newly constructed sidewalk also observed to be in good shape. Since site inspection did not reveal any problem, granting of NFA-ATI is recommended to proceed.

AREAS OF CONCERN:

REGULATION	EXPLANATION	CORRECTED?
<u>All AOIs</u>	<u>Site remediation has been completed</u>	<u>YES</u> NO
		YES NO
		YES NO

PHOTOS TAKEN: YES NO SAMPLES TAKEN: YES NO (Attach Chain-of-custody)

RECEIVED BY: SIGNATURE: N/A

PRINT NAME: _____
 (NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)

INSPECTOR(S): Edwin Akujobi CROSS REFERENCE: _____
 ATTACHMENTS: _____
 REVIEWER: Clara Tully

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes, regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.