Preliminary Draft Report

Contaminated Soils Disposal Cost Estimate

Parcel 128 (Former Vermont American Site)

500 East Main Street, Louisville, KY

The Ohio River Bridges Project, Section 1

Kennedy Interchange Reconstruction

Prepared for:

Kentucky Transportation Associates (KTA)
c/o Qk4
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Phone (502) 585-2222

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August 30, 2010

Draft Report of Contaminated Soil Disposal Cost Estimate

Parcel 128 (500 Associates/former Vermont American Site)

Introduction

This report is in response to the Kentucky Transportation Cabinet's (KYTC) need and request for a plan and cost estimate for the disposal of contaminated soils that will need to be excavated from Parcel 128, which is planned for acquisition by KYTC on the Ohio River Bridges, Section 1-Kennedy Interchange Reconstruction Project. This project is a Federal Highway Administration (FHWY)-aided project, and FHWY policy and guidelines require that sites subject to acquisition be environmentally assessed, and that contamination found be considered and factored into the acquisition process and net purchase price offer.

Background

Parcel 128 is 0.5 acre in size and is the eastern-most portion of a larger (1.5 acre) single-owner site bounded by E. Main Street to the north, I-65 to the east, Billy Goat Strut Alley to the south, and S. Jackson Street to the west. (See site location map and aerial photo, attached). The site is currently owned by 500 Associates, Inc., having purchased it from Vermont American ("VA," now Robert Bosch Tool Corporation) in 1987. VA operated the site from 1955 until 1986 for the manufacture of saw blades, drill bits and other machine tools. According to the available reports, the site operations included metal milling, heat treatment, degreasing, chrome/nickel plating, and painting. Chemicals associated with these operations included acids, cyanide, metals (arsenic, chromium, lead, and nickel), chlorinated and organic solvents, and petroleum products, including cutting oils and diesel fuel.

Significantly, according to the documents and reports these operations were a "Large Quantity Hazardous Waste Generator" of ten or more characteristic and listed RCRA hazardous wastes, including D007 (toxicity for chromium), F006 (wastewater treatment sludges from electroplating operations), and F007 (spent cyanide plating bath solutions from electroplating operations), to name a few. Most important, the files reviewed include a number of references to releases or spills of these hazardous wastes over the years.

Last, the eastern portion ('Main Street Parcel') of the site, which includes the area of Parcel 128, is currently undergoing environmental site closure with KYDEP/DWM. A Bosch/MACTEC May 20, 2010 proposed Management Plan has been reviewed and provisionally "accepted" by DWM, and given the recent site access authorization by 500 Associates to Bosch, MACTEC will be mobilizing to the site in September to advance the up to 38 additional soil borings requested by DWM. It is anticipated that the additional data and information obtained from this supplemental assessment will be shared with DEA and KTA.

Soil Quantities Basis

The planned excavated soil area, depth, and volume quantities used here are from KTA/WMB, Inc.'s August 13, 2010-revised "Estimate of Excavation Quantities on Parcels Being Acquired in Identified Areas of Contamination" spreadsheet, and are based on preliminary embankment/ roadway and structure designs, and are subject to future revisions.

Disturbance/Quantities:	Area	Depth	Volume	Weight*
Embankment/Roadway	10,903 ft^2	2 ft.	807 yd^3	1,307 tons
Sewer	1,281	5	237	384
Structure	10,812	8	3,204	5,190
Totals:	22,996 ft^2	--	4,248 yd^3	6,882 tons

* Tons calculated at 120 lbs/cu.ft. (3,240 lbs/cu.yd.) Call 7,000 tons.

Soil Dispositions

Based on the soil contamination data available in past reports (see further below), there are four or more possible dispositions for the excavated soils, which are dependent on and determined by the specific origin or source of contamination, and the composition and concentrations of the contaminants, where known. From least to most significant and costly, these dispositions are:

1) Reuse *On-Site as Backfill* – Uncontaminated soils, or contaminated soils not caused by the release of a listed RCRA hazardous waste, and by Kentucky regulation (401 KAR 100.030), meet EPA Region 9's (2002) *Residential* Preliminary Remediation Goals (PRGs), may be reused on site as backfill. Also, contaminated soils exceeding the Residential PRGs (but not the Industrial PRGs) *may* possibly be allowed to be reused on-site under the KYDEP/ DWM/ Hazardous Waste Branch's current informal (not written) "Contained-in-Determination (CID)" policy and guideline. (However, according to the Hazardous Waste Branch, this has not been permitted in the 7 or 8 CID requests by property owners/waste-soil generators to date. Also significant, it is the Branch's preference that a CID determination request be made based on *in-situ* (soil boring or trenching) samples, i.e., before excavation/removal of the soils, rather than after the soil has already been excavated.

   Important note: Soils contaminated from the release of a listed RCRA hazardous waste and still in the ground are not classified as a hazardous waste unless and until the soils are excavated/removed from the ground, at which time they do become a 'derived-from' listed hazardous waste, and are subject to most of the same rules and regulations under RCRA.

2) *Non-Hazardous Waste Landfill* – Soils contaminated from the release of other than a listed RCRA hazardous waste (e.g., from a petroleum-product storage tank), and are not RCRA-hazardous by 'characteristic' (ignitability, corrosivity, reactivity, or toxicity), may be disposed of in a 'Subtitle D' or non-hazardous waste landfill, such as Waste Management, Inc.'s Outer Loop Landfill in Louisville. However, this disposition must first be approved by KYDEP/ DWM, and the generator must then submit a waste profile to the landfill operator, including certification that the waste soil is not hazardous, before the landfill can accept delivery.

3) *Hazardous Waste Landfill* – Excavated contaminated soils in this disposition category would be those known or suspected of being derived-from a listed hazardous waste; that fail a characteristic hazardous waste test (e.g., a Toxicity Characteristic Leaching Procedure, or TCLP, analysis) or other non-hazardous waste landfill acceptance criteria (e.g., paint filer test for free liquid). The acceptance criteria for disposal (directly) into a hazardous waste (Subtitle C) landfill are many, and are partly dependent on a given landfill's RCRA operating permit conditions; primary among the general criteria being that a hazardous waste be at or below its 'as-generated' Universal Treatment Standards (40 CFR 268.40), or optionally for contaminated soils, that it be below its Alternative Treatment Standards (40 CFR 268.49),

4) *Haz. Landfill w/Stabilization* – Last here, and simply stated, if the contaminated soil does not meet either the Universal Treatment Standards or optional Alternative Treatment Standards for direct disposal into the hazardous waste landfill, the soil must first be chemically treated or "stabilized" down to one or the other (at the generator's, not the landfill operator's option) of the above treatment standards before it can be disposed of in the landfill.

Note: There is a fifth possible disposal/disposition category, incineration, which would need to be invoked if a contaminated soil was not amenable to satisfactory stabilization prior to disposal in the hazardous waste landfill. However, because metals-contaminated soils are typically very amenable to stabilization, the need for incineration is unlikely, and therefore is excluded from the disposition quantities premises and range of cost estimates in the following sections pending results of soil sample TCLP analysis in the future.

Disposal Unit Costs

Budget unit (per ton) cost quotations for the above three off-site landfill disposal dispositions were obtained from Waste Management, Inc. technical and sales representatives in Louisville and Emelle, AL (see quotations, attached), and are summarized as follows:

Disposition Unit Costs	Backfill/ On-Site	Non-Haz. Landfill	Haz. Landfill (No Stabiliz.)	Haz. Landfill Stabilization
Transportation	n/a	$8.00/ton	$93.00/ton	$93.00/ton
Trans. Fuel Surcharge	n/a	Incl.	$19.00	$19.00
Chemical Stabilization	n/a	n/a	n/a	$91.00
Landfill Disposal Fee	n/a	$26.00	$93.00	$93.00
Landfill 'Environ.' Fee	n/a	1.2% $0.31	$11.00	$22.00
Jefferson County Tax	n/a	5.0% $1.30	n/a	n/a
KY and AL State Tax	n/a	$1.75	$21.00	$21.00
Total Unit Costs:	Nil.	$37.36/ton	$237.00/ton	$339.00/ton

Note: Because EPA Toxicity Characteristic Leaching Procedure (TCLP) test results for the soils are not currently available, the quotations and unit disposal costs are not firm, and are subject to change depending on future submittals of the required waste profiles and certifications.

Total Cost Estimate

Until the necessary data (see Additional Data Required, further below) may become available, it is possible at this time to provide only a range of plausible soil dispositions and cost estimates; therefore, based on the data currently available, our range of cost estimates is as follows:

Disposition Premise 1	Backfill On-site	Non-Hazardous Waste Landfill	Haz. Landfill (No Stabiliz.)	Haz. Landfill Stabilization
% of 7,000 tons, total	40%	40%	20%	0%
Weight, tons	2,800	2,800	1,400	700
Soil Disposition Costs	Nil.	$104,614	$331,800	$0

For a total soil disposition cost estimate of $436,414

Disposition Premise 2	Backfill On-site	Non-Hazardous Waste Landfill	Haz. Landfill (No Stabiliz.)	Haz. Landfill Stabilization
% of 7,000 tons, total	30%	30%	30%	10%
Weight, tons	2,100	2,100	2,100	700
Soil Disposition Costs	Nil.	$78,460	$497,700	$237,300

For a total soil disposition cost estimate of $813,460

Disposition Premise 3	Backfill On-site	Non-Hazardous Waste Landfill	Haz. Landfill (No Stabiliz.)	Haz. Landfill Stabilization
% of 7,000 tons, total	25%	25%	25%	25%
Weight, tons	1,750	1,750	1,750	1,750
Soil Disposition Costs	Nil.	$65,384	$414,750	$593,250

For a total soil disposition cost estimate of $1,073, 384

The average of these three cost estimates is $774,419, or, conservatively rounded, $800,000. Based on the available data, although limited, it is more likely that the true cost will be less, not more, than this mean, and therefore a half-order of magnitude range of **$800,000 +25%/-50%** is KTA's best effort cost estimate at this time.

Notes:

1. The total excavated soil quantity (7,000 tons) used here is based on the currently planned construction-disturbance areas and depths, and is irrespective of contamination. Therefore, future soil excavation and temporary staging costs are not included in these cost estimates;
2. It is understood that Bosch will remain financially responsible and liable for post-acquisition environmental requirements for the remaining (undisturbed) contaminated soils, including ostensibly the Cabinet's preparation and implementation of a parcel-specific Management Plan; engineered barriers, if any (e.g., plastic liners), that may be required in addition to the clean soil embankment/roadway, sewer, and structure areas backfill; and groundwater wells installation, monitoring, and, reporting. If this is not now or will not in the future be the case, then KYTC may wish to add approximately $50,000 to $75,000 to the above contaminated soil disposal cost estimates;
3. By way of comparison, a November 15, 1994 letter from 500 Associates to KYDEP states, "VA's general counsel has admitted that if the contamination had to be remediated, it would cost at least $2,000,000. Assuming this cost figure was for the entire 1.474 acre VA site, and given that Parcel 128 is 0.532 acres, or 36.1%, of the total site area, the corresponding proportional amount of VA's $2MM estimate that may be inferred to be attributable to Parcel 128 is $721, 845 (not including inflation/escalation to present date).

Available Data Summary

Over a dozen environmental site assessments (ESAs) or investigations have been performed and reported by various entities and their consultants from about 1987 to date, including several independent reports consolidating and reviewing those original-source ESA reports. The more significant and useful of these reports that were reviewed, in chronological order, are as follows:

Doe Anderson Advertising Agency/ERC Environmental and Energy Services Co. [ERCE], "Level I Pre-Acquisition Site Assessment [Report]," July 27, 1990;

Doe Anderson Advertising Agency/ERCE, "Draft Level II Pre-Acquisition Site Assessment [Report]," November 15, 1990;

500 Associates/Law Environmental, Inc., "Report of Soil Sampling and Analysis," July 9, 1991 [soil gas survey and groundwater sampling for volatile organic compounds (VOCs) only];

KYDEP/DWM/Superfund Branch, "Preliminary [Site] Assessment Report, Vermont American Corp.," to U.S. EPA Region 4, June 23, 1995;

KYDEP/DWM/Superfund Branch, "Site Investigation Report," March 14, 1997;

Vermont American/Dames & Moore, "Site Characterization Report," January 28, 1999;

500 Associates/Global Environmental Solutions, Inc. (GESI), "Final Site Investigation Report," July 26, 2000 [

500 Associates/Tetra Tech EM Inc., "Management Plan," February 2003;

Robert Bosch Tool Corporation/MACTEC, "Management Plan," [Revised] May 20, 2010;

The soil boring (and trenching) soil sample and laboratory results data provided in these reports for the primary contaminants of concern (the RCRA metals arsenic, chromium, and lead, and for non-RCRA nickel and total cyanide), are shown by report, area, and boring/sampling location and depth in the attached available data summary spreadsheet.

In brief, within the limitations of the available data for the current purpose, these data show the presence of contaminants (most notably chromium) exceeding one or more applicable regulatory limits, precluding the reuse of those soils on-site and therefore requiring off-site landfill disposal.

Additional Data Required

The data provided in the past ESA reports are intended and useful for 500 Associates/Bosch's objective/purpose of environmental site closure with KYDEP/DWM via leaving the contaminated soils 'in-place,' together with engineered barriers and deed restrictions limiting future land-use. These data, however, are less than sufficient for the Transportation Cabinet's immediate need of a definitive (and defensible) plan and cost estimate for the disposition of the future excavated contaminated soils. Comparisons of the available and additionally-required assessment data are as follows:

Sampling Areas –

1. As indicated by the '●' (within the Parcel 128 R/W) and '○' (outside of Parcel 128) notations before each soil sample number in the attached data summary spreadsheet, of the 35 total number of boring or trenching samples reported, 14, or 40%, of the locations are outside of Parcel 128. An additional approximately 12 boring locations will need to be sampled in the areas not previously assessed.
2. More specifically, of the 60% of sampling locations reported inside the Parcel 128 R/W, they are almost entirely concentrated in the two small, isolated areas of the Ni/Cr plater in the Bonded Warehouse and Circular Saw/Plater #2 in the 1990-demolished building (now the open courtyard), totaling approximately 3,450 square feet, or 15% of the area to be acquired (23,190 sq.ft.) or disturbed (22,996 sq.ft.).
3. Three borings (ES-1, ES-2, and ES-3), totaling 6 feet of soil sample, are reported for the East Shop, which is approximately 8,000 sq.ft. in area, and is described in the reports as having several pits and trenches, piping systems and drains, and cracked concrete floors extending almost the entire length of the ~150-foot long building. One (ES-3) of the three borings, however, appears to be located outside of the building and property boundary line, and therefore outside of Parcel 128's R/W. Additional soil borings will need to be advanced in the East Shop.

Sample Intervals -

4. 40% of the total quantity of soil to be excavated is in the first two feet below ground surface. However, with the exception of DWM's 1997 hand-augured samples immediately below the Bonded Warehouse's concrete-floor, there are no boring samples data for the 0-2' (or 0-3') interval. Because releases/spills of heavy metals-bearing wastes (as is the case here) tend to concentrate in the surficial or surface and shallow soils, it will be necessary to revisit the site and obtain representative samples from this interval across the entire Parcel 128 area. These data would help to significantly reduce the uncertainties in the above-premised soil disposition quantities, and therefore would provide for a correspondingly more accurate and confident total disposal cost estimate.
5. Similarly, but perhaps less critical, the data available for the borings sampled below 3 feet are not continuous, or representative, of the entire soil boring depth. For example, the twelve BW (Bonded Warehouse), ES (East Shop), and CSP' (Circular Saw/Plater #2 Area) borings, most of which are inside of the Parcel 128 R/W, were sampled and analyzed on two 1-foot subintervals, representing only approximately 20% of the total boring depth (typically 8 feet, more or less). As is being done on the Kennedy Interchange project parcels currently being assessed by KTA, sampling of the continuous 0-2', 2-5', and 5-8' (or 5-10') intervals would have been preferred for soil disposition and disposal cost estimating purposes here.

Sample Analyses -

6. The available report data provide only one Parcel 128-located soil sample (BW-5 Duplicate, 3-4') EPA Toxicity Characteristic Leaching Procedure (TCLP) test result for chromium, which exceeded its TCLP limit (5 mg/L) by 32%. The significance of this is twofold: First, virtually all of the excavated soil disposition category determinations and associated costs are mainly

if not solely (e.g., non-hazardous waste landfill acceptance) based on TCLP. Second, the data for this sample indicates a relatively low threshold for excess TCLP at the site for soil samples exhibiting total chromium concentrations above approximately 200 mg/kg.

7. Less significant, data are not available for semi-volatile organic compounds (SVOCs) or their polynuclear aromatic hydrocarbon (PNA/ PAH) compounds subset, the latter being common indicator-contaminants of petroleum-product releases such as diesel fuel and heating oil. The significance here is that the two borings (B1 and FAST-1) in the area of the former aboveground diesel fuel storage tank (AST) in the alleyway south of the East Shop were not analyzed for SVOCs or PNAs, or for total petroleum hydrocarbons (TPH). If the opportunity arises in the future, it would be desirable to include these in the assessor's sampling and analysis plan.

Conclusion

Until the necessary additional data become available for the Transportation Cabinet's need of a fair, confident, and defensible disposition plan and cost estimate for the soils that will need to be excavated during the Kennedy Interchange reconstruction on Parcel 128, the currently available data provide only for the +25%/-50% range of cost estimates presented here. We are confident, however, that this range can be significantly and satisfactorily reduced to a more definitive cost estimate when that data are obtained.

Marshall Levy

Barr & Prevost

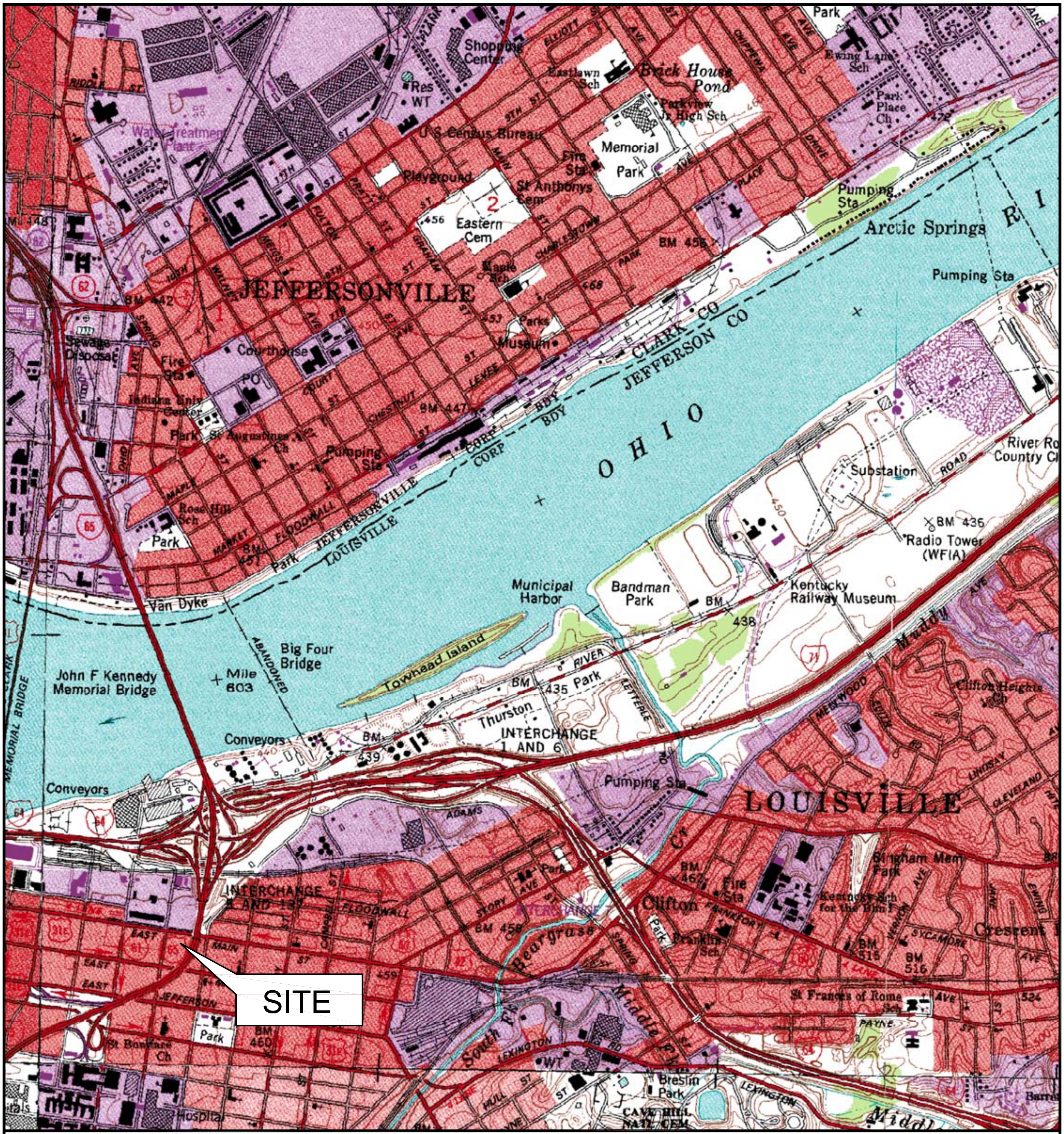
Attachments -

Site location map and aerial photo (taken from a Bosch/MACTEC report)

KTAWMB, Inc. August 13, 2010-revised "Parcel 128 Hazmat Data Plan Sheet"

Waste Management, Inc. Outer Loop and Emelle, AL waste landfill quotations

Summary of Available Report Data Spreadsheet (M. Levy; Barr & Prevost)



SOURCE: USGS 7.5' TOPOGRAPHIC QUADRANGLE MAP, JEFFERSONVILLE, INDIANA, 1993

MACTEC
2456 Fortune Drive, Suite 100
Lexington, Kentucky 40509
Phone: (859) 255-3308

TOPOGRAPHIC MAP

FORMER VERMONT AMERICAN FACILITY
500 EAST MAIN STREET, LOUISVILLE, KENTUCKY

PROJECT NUMBER: 6680-08-9635

SCALE	1" = 2000'
DATE	06/17/2008
DRAWN BY	ALD
APPROVED BY	WCG

FIG. 1

SOURCE: KENTUCKY DIVISION OF GEOGRAPHIC INFORMATION (DGI), AIR PHOTO FROM FARM SERVICES ADMINISTRATION (2004)

0 500 1000
APPROX. SCALE IN FEET

NORTH

MACTEC
2456 Fortune Drive, Suite 100
Lexington, Kentucky 40509
Phone: (859) 255-3308

SITE VICINITY

FORMER VERMONT AMERICAN FACILITY
500 EAST MAIN STREET, LOUISVILLE, KENTUCKY

PROJECT NUMBER: 6680-08-9635

APPROX. SCALE	1" = 500'
DATE	06/19/2008
DRAWN BY	KDR
APPROVED BY	ALD

FIG. 3

COUNTY OF	ITEM NO.	SHEET NO.

LEGEND

- EMBANKMENT/ROADWAY DISTURBANCE
- SEWER DISTURBANCE
- STRUCTURAL DISTURBANCE
- PARCEL BOUNDARY

CATEGORY	AFFECTED SURFACE AREA	AFFECTED VOLUME AREA	APPROX. AFFECTED DEPTH
EMBANKMENT/ROADWAY DISTURBANCE	10,903 SF	807 CY	2 FT
SEWER DISTURBANCE	1281 SF	237 CY	5 FT
STRUCTURAL DISTURBANCE	10,812 SF	3204 CY	8 FT

0' 30'

HAZMAT DATA PLAN SHEET P128

PREPARED BY ____ DATE ____
CHECKED BY ____ DATE ____
APPROVED BY ____ DATE ____

USER: $$$USER$$$
13-AUG-2010 DATE: $$$$
FILE NAME: $$$design$file$specification$$$
E-SHEET NAME:

Waste Management
Industrial Technical Svc Center
Highway 17 N. Mile Marker 163
P.O. Box 55
Emelle, AL 35459
(205) 652-9721

August 24, 2010

Marshall Levy
Barr Engineering
Email: mlevy@barreng.com

FOR BUDGETARY PURPOSES ONLY

Waste Management is pleased to provide you with BUDGETARY PROPOSAL for the disposal of the below referenced material. Based on the information provided, the following summarizes our quotation.

WASTE LOCATION
Ohio River Bridges, Kennedy Interchange Reconstruction Project
Site #85, Parcel 1128
Louisville, KY
WASTE DESCRIPTION
Non Hazardous Soil
WM FACILITY
WM Outer Loop Landfill
2673 Outer Loop
Louisville, KY 40219
DISPOSAL CHARGES
$26.00/Ton – Solid for Direct Landfill
3 Ton Per Load Minimum
PROFILE APPROVAL FEE
$ 50.00/Profile – Waste Approval Fee
$1.75/Ton – Kentucky Solid Waste Fee
5% Host Community Fee
Environmental Fee - $5.00/Load (under 4 tons), $10.00/Load (over 4 tons)
Fuel Surcharge will apply – Varies based on current fuel prices
**See attached sheet for other charges that may apply **
TRANSPORTATION CHARGES
$ 8.00/Ton
22 Ton Per Load Minimum

All pricing is contingent upon the review of the Generator's Waste Profile Sheet. All documents must be completed and signed by an authorizing signatory of the generator.

Upon acceptance of this proposal, please contact me at your earliest convenience for the paperwork required to begin the approval process.

This price is good for sixty (60) days. If not accepted in the allotted time, all pricing will expire.

Thank you for this opportunity to be of service to you. If you should have any questions, please do not hesitate to call me at 502/216.3327.

Sincerely,
WASTE MANAGEMENT
Gregg Wroblewski
Industrial Account Manager
GW/gh

ATTACHMENT FOR FEES/SURCHARGES: (If Applicable)

APPROVAL FEES:

Profile Recertification Fee: $ 25.00/Profile

Preprinted Manifest - $1.00/Each.

Spill Cleanup - $500.00/load.

Certification of Burial/Destruction – $200.00.

Wash-Out - $200/load.

Special Handling/Burial - $175.00.

Dig-Out - $150.00.

Tarp - $100.00/Each.

Additional Documentation – Tickets cc's – $50.00.

Record Management (Extra Copies) – $50.00.

Waste Ban Items (Specify) - $50.00.

Witness Destruction - $50.00.

Unloading Fee (after 1 hour) - $100.00/hour with a one hour minimum/load

Waste Management
Technical Service Center
36964 Alabama Highway 17
P.O. Box 55
Emelle, AL 35459
(205) 652-9721

August 19, 2010

Marshall Levy
Barr Engineering
Email: mlevy@barreng.com

*****FOR BUDGETARY PURPOSES ONLY*****

Waste Management is pleased to provide this budgetary proposal for the disposal of the below referenced material. Based on the information provided, the following summarizes our quotation.

Waste Location:	**Ohio River Bridges, Kennedy Interchange Reconstruction Project Louisville, KY (Approx 2400 Tons)**
Disposal Facility:	**Waste Management 36964 Alabama Hwy 17 Emelle, AL 35459**
Disposal Method:	**Hazardous Solids for Stabilize & Landfill**

**** Stabilization pricing is based on a standard stabilization recipe.***
****A two quart sample or current TCLP analysis is required, to develop a recipe and confirm pricing.***
****Cyanides must meet treatment standards.***

Disposal Price:	**$184.00/Ton plus tax 10 Ton Per Load Minimum**

Disposal Method:	**Hazardous Solids meeting Treatment standards for Direct Landfill**
Disposal Price:	**$ 93.00/Ton plus tax 10 Ton Per Load Minimum**

Alabama State Tax:	**See attachment **Applies to Landfill Waste Only****
ADEM Fee:	**$170.00/Profile **Applies to Landfill Waste Only****
WM Waste Approval Fee	**$ 50.00/Profile**
Disposal/Environmental Fee	**Varies Weekly (Currently 11.97%)**

*** See attachment for other possible additional fees/surcharges**

Disposal Method:	**Store and Transship for Incineration**
Disposal Price:	**$ .60/lb If Bulk Solid BTU's <2000 $ .68/lb If Bulk Solid BTU's 2001-5000 $ .78/lb If Bulk Solid BTU's >5000 $1.03/lb If Bulk Sludge 15 Ton Per Load Minimum Applies to the above per pound pricing**

****Note: Above pricing includes transportation from Emelle, AL to the incinerator at Port Arthur, TX**

Transportation Price:	
Priority Load Rate	**$1855.70/Trip plus fuel surcharge – Dump**
Demurrage	**$ 85.00/Hour (After 2 hours)**
Liner	**$ 50.00/Each**
Fuel Surcharge:	**Fuel Surcharge – Based on Current Fuel Prices (Currently 20.5%)**

August 19, 2010

All pricing is contingent upon the review of the Generator's Waste Material Profile Sheet. Stabilization pricing is based on a standard stabilization recipe. A two quart sample is required, to develop a recipe, for waste requiring stabilization. The Waste Profile and all supporting documents must be completed and signed by an authorized signatory of the Generator.

Your waste may be subject to surcharges upon receipt at the TSDF. See attachment.

Upon acceptance of the proposal, please contact me at your earliest convenience for the paperwork required to begin the approval process.

This proposal is good for sixty (60) days. If not accepted in the allotted time, all pricing will expire.

Thank you for the opportunity to provide you with this budgetary proposal. If you have any questions, please feel free to contact me at (502)216.3327.

Sincerely,
Waste Management

Gregg Wroblewski
Account Manager

GW/gh

Attachment

ATTACHMENT

EMELLE FACILITY FEES/SURCHARGES: (If Applicable)

For tanks, large debris items or large direct landfill disposal items add $200/hour for two-man crew, plus $100/hour crane rental w/30 ton limit. Crane rental jobs 30 tons and greater will be quoted on a case-by-case basis. (Does not apply to Transformers less than 25 tons).

Bulk solid density assumes 2,000 pounds = one cubic yard. (Direct landfill/stabilization waste streams only.)

Direct landfill bulk minimum – 10 Tons per load (Excludes tax).

Stabilization/Solidification bulk liquid minimum (Tanker or Vac Box) – 10 Tons per shipment (Excludes Tax).

Treatment bulk minimum (Stabilization, microencapsulation) – 10 times bulk rate (Excludes Tax).

Incidental liquids in bulk solid loads for direct landfill (requiring solidification) - $800.00/load.

Spill Cleanup/Leaking Loads - $500/load minimum cleanup, additional labor and materials – cost plus 35%.

Unscheduled/Late Loads (After hours) - $400.00/Hour (Minimum).

Dig Out - $150.00/Hour (Minimum)

Overweight Loads (Greater than 80,000 pounds) - $100.00.

Witness Destruction - $50.00/Hour (Minimum)

Special Handling/Burial - $150.00/Hour (Minimum)

Washout - $350/load minimum or cost plus 35%.

WM transportation fuel surcharge – Varies monthly based on current fuel prices.

Demurrage - $85/hour – After 2 hours of loading time at the Generating Facility.
- $85/hour – After 5 hours (not to exceed 10 hours for every 24 hour period) at the Disposal Facility due to errors in manifesting or other required documentation.

CWM APPROVAL FEES:

Waste Approval Fee:	**$ 50.00/Profile**
Profile Recertification Fee:	**$ 25.00/Profile**

ADEM FEE:
$170.00/Profile - Initial Approval, Renewal, or Modification (No ADEM fees will be waived.)

Record Management (Extra Copies) – Current and prior year - $50.00 (Minimum)

Record Management (Extra Copies) – Greater than 3 years - $150.00 per hour (1 hour Minimum)

Certification of Burial/Destruction (Non-TSCA) – Current and prior year - $25.00/each

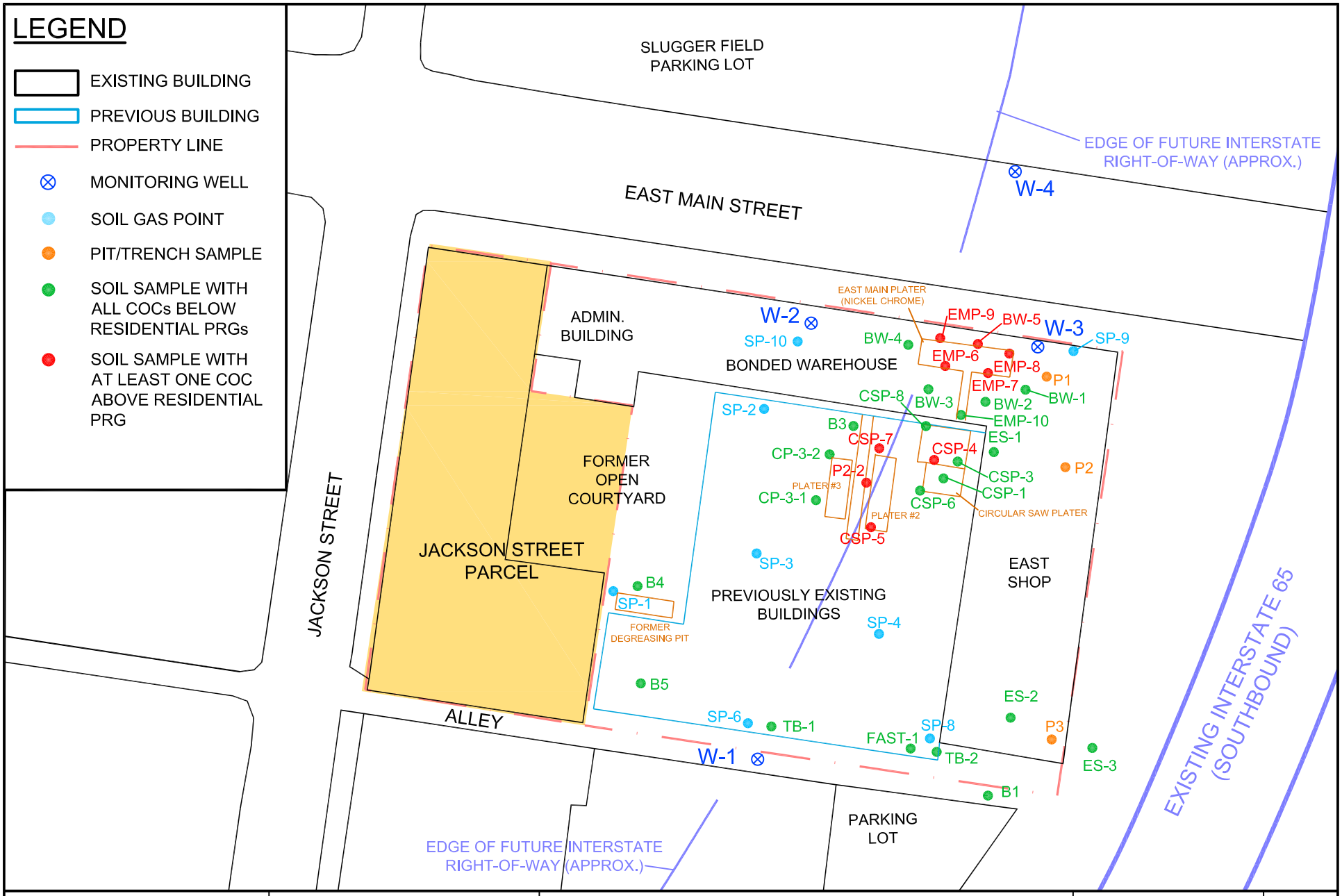
Credit Approval Fee - $25.00

Manifest Fee: $1.00 Each – If Requested

Disposal/Environmental Fee Surcharge – Percentage rate varies weekly.

Waste stream evaluation fee (outside lab) – Cost plus 35%.
(NOTE: Waste Stream Evaluation fees will be billed for samples sent by the Emelle Facility to an outside lab for analysis.)

Alabama Taxes:
$ 6.00/Drum or $ 21.00/Ton – Non-Hazardous & RCRA D Codes for Stabilization or Microencapsulation
$ 6.00/Drum or $ 21.00/Ton – K061 Electric Arc Furnace Dust (Stab)
$ 8.50/Drum or $ 31.00/Ton – PCB (TSCA), RCRA D Codes for Macroencapsulation, RCRA F & K Codes
$ 8.50/Drum or $ 31.00/Ton – RCRA D Code Soil Alternative / Meeting Treatment Standards
$ 15.00/Drum or $ 56.00/Ton – RCRA Hazardous U Codes
$ 24.00/Drum or $ 93.00/Ton – RCRA Hazardous P Codes


LEGEND
EXISTING BUILDING
PREVIOUS BUILDING
PROPERTY LINE
MONITORING WELL
SOIL GAS POINT
PIT/TRENCH SAMPLE
SOIL SAMPLE WITH ALL COCs BELOW RESIDENTIAL PRGs
SOIL SAMPLE WITH AT LEAST ONE COC ABOVE RESIDENTIAL PRG
SLUGGER FIELD PARKING LOT
EDGE OF FUTURE INTERSTATE RIGHT-OF-WAY (APPROX.)
EAST MAIN STREET
W-4
W-2
W-3
ADMIN. BUILDING
BONDED WAREHOUSE
EAST MAIN PLATER (NICKEL CHROME)
FORMER OPEN COURTYARD
JACKSON STREET PARCEL
JACKSON STREET
PREVIOUSLY EXISTING BUILDINGS
EAST SHOP
FORMER DEGREASING PIT
PLATER #3
PLATER #2
CIRCULAR SAW PLATER
ALLEY
W-1
PARKING LOT
EXISTING INTERSTATE 65 (SOUTHBOUND)
SP-1
SP-2
SP-3
SP-4
SP-6
SP-8
SP-9
SP-10
B1
B3
B4
B5
BW-1
BW-2
BW-3
BW-4
BW-5
CP-3-1
CP-3-2
CSP-1
CSP-2
CSP-3
CSP-4
CSP-5
CSP-6
CSP-7
CSP-8
EMP-6
EMP-7
EMP-8
EMP-9
EMP-10
ES-1
ES-2
ES-3
FAST-1
P1
P2
P2-2
P3
TB-1
TB-2
0
30
60
APPROX. SCALE IN FEET
NORTH
MACTEC
2456 Fortune Drive, Suite 100
Lexington, KY 40509
(859) 255-3308
SAMPLING LOCATIONS
FORMER VERMONT AMERICAN FACILITY
500 EAST MAIN STREET, LOUISVILLE, KENTUCKY
PROJECT NUMBER: 6680-08-9635
APPROX. SCALE 1" = 60'
DATE 05/09/2010
DRAWN BY SMD
APPROVED BY ALD
FIG. 4

SUMMARY OF AVAILABLE DATA FOR PARCEL 128 (500 ASSOCIATES/FORMER VERMONT AMERICAN SITE)

M. Levy
8/25/10

(See table legend at bottom)

Boring No.	Bor./Sample Location	Sample I.D.	Sample Interval(s)	Arsenic	Chromium	Hex.Chrom.	Lead	Nickel	Cyanide
				--- All values except TCLP limits are total, mg/kg (ppm), dry wt. basis ---					
Reference Criteria Concentation Limits for Comparison									
EPA Region 9 Soil PRGs (2002) - Residential				0.390	211	30.1	400	1,564	No Value
EPA Region 9 Soil PRGs (2002) - Industrial/Comm.				1.59	448	64.0	750	20,439	for *Total*
Toxicity Characteristic Leaching Procedure (TCLP)				5 mg/L	5 mg/L	n/a	5 mg/L	n/a	Cyanide
'20-Times TCLP Limit Rule' Criteria Values (mg/kg)				100	100	n/a	100	n/a	"
Universal Treatment Standards (40 CFR 268.40)				5 mg/L TCLP	0.60 mg/L TCL	n/a	0.75 mg/L TCL	11 mg/L TCLP	590 mg/kg
Alternative Treatment Standards (40 CFR 268.49)				At least 90% reduction, or, optionally, 10X Universal Treatment Standards					
ERCE, "Draft Preliminary Level II Preacquisition Site Assessment," November 15, 1990									
Soil Boring Samples									
○ B1	Alley, East, Parcel 128	VAB-1	10-16'	2.9	3.5	N.D.	N.D.	10	0.07
○ B2	Jackson Street Parcel	VAB-2	3-4½, 6-7½, 9-10½'	6.0	16	N.D.	N.D.	12	0.108
○ B3	Cr plating area, outside	VAB-3B (?)	3-4½, 6-7½, 9-10½'	2.5	100	N.D.	N.D.	12	0.057
○ B4	Degreasing pit, outside	VAB-4	3-4½, 6-7½, 9-10½'	5.4	3.5	N.D.	N.D.	9.5	0.07
○ B5	Heat treat area	VAB-5	3-4½, 6-7½, 9-10½'	5.6	3.5	N.D.	N.D.	7.5	0.18
○ B6	Degreasing pit area	VAB-6	??? (No boring log)	11	390	N.D.	N.D.	440	0.14
○ W1	Alleyway south of site	VAW-1	3-4½, 6-7½, 9-10½'	4.6	3.0	N.D.	N.D.	10	0.07
○ W2	Bonded Warehouse	VAW-2	3-4½, 6-7½, 9-10½'	5.6	5.5	N.D.	N.D.	11	N.D.
● W3	Bonded Whse., Ni/Cr	VAW-3	3-4½, 6-7½, 9-10½'	5.1	110	N.D.	N.D.	405	0.06
KYDEP/DWM/Superfund Branch, "Site Investigation Report," March 14, 1997					Samples split between KYDEP/DWM (and CTI)				
Bonded Warehouse/East Main [Ni/Cr] Plating Area									
● EMP-6	Beneath concrete floor		?	7.6 (9)	37 (34)	58 (N.D.)	92 (62)	11	N.D. (0.026)
● EMP-7	"		?	<2.9 (7)	480 (270)	36 (N.D.)	33 (30)	2,000	0.8 (0.063)
● EMP-8	"		?	<2.8 (N.D.)	1500 (1200)	66 (280)	56 (120)	5,900	1.6 (0.19)
● EMP-9	"		?	<2.8 (9)	790 (1900)	140 (570)	23 (32)	140	N.D. (0.025)
● EMP-10	"		?	5.3 (12)	11 (12)	6 (N.D.)	120 (55)	12	1.5 (0.16)
Circular Saw/Plater #2 Area (trenched/excavated soil samples)									
● CSP-1	Beneath concrete floor		1.0' below concrete flo	<2.7 (8)	36 (72)	N.A.	21 (24)	-	3 (1.5)
? CSP-2 ???	?								
● CSP-3	Beneath concrete floor		5.7' below floor.	3.2 (9)	150 (230)	20 (38)	8.6 (8.1)	-	N.D. (0.25)
● CSP-4	"		1.0' below floor	<3.8 (17)	11000 (8900)	N.A.	270 (200)	-	81 (0.015)
○ P2-2	Adj. to stained brick wall		~1' below grade	<3.2 (10)	1400 (860)	9.7 (100)	420 (260)	-	17 (1.3)

SUMMARY OF AVAILABLE DATA FOR PARCEL 128 (500 ASSOCIATES/FORMER VERMONT AMERICAN SITE)

M. Levy
8/25/10

(See table legend at bottom)

Boring No.	Bor./Sample Location	Sample I.D.	Sample Interval(s)	Arsenic	Chromium	Hex.Chrom.	Lead	Nickel	Cyanide
GESI, "Final Site Investigation Report," July 26, 2000									
(All soil boring samples)									
Bonded Warehouse									
● BW-1	Ni/Cr Plating Area		3.0-4.0'	-	10.1	N.D.	7.07	-	-
"			6.9-7.9'	-	26.7	N.D.	7.19	-	-
● BW-2	"		3.0-4.0'	-	12.6	N.D.	13.4	-	-
"			7.7-8.7'	-	12.6	N.D.	8.70	-	-
● BW-3	"		3.0-4.0'	-	14.1	N.D.	11.6	-	-
"			6.8-7.8'	-	8.16	N.D.	7.35	-	-
○ BW-4	Ni/Cr Plating (west side)		3.0-4.0'	-	10.5	N.D.	7.81	-	-
"			8.0-8.8'	-	8.57	N.D.	8.98	-	-
● BW-5	Ni/Cr Plating Area		3.0-4.0'	-	256	216	14.1	-	-
"			3.0-4.0' (Duplicate)	-	271*	210	10.1	-	-
"			7.9-8.9'	-	98.0	62.4	6.14	-	-
					*TCLP= 6.61 mg/L				
East Shop									
● ES-1			3.0-4.0'	-	13.0	N.D.	22.6	-	-
"			6.9-7.9'	-	10.4	N.D.	9.79	-	-
● ES-2			3.0-4.0'	-	13.6	N.D.	11.5	-	-
"			7.0-8.0'	-	10.6	N.D.	9.43	-	-
○ ES-3			3.0-4.0'	-	11.0	N.D.	8.11	-	-
"			7.0-8.0'	-	5.53	N.D.	4.96	-	-
Circular Saw/Plater #2 Area									
● CSP-5			3.0-4.0'	-	157	96.0	8.59	-	-
"			6.8-7.8'	-	88.6	27.0	6.94	-	-
● CSP-6			3.0-4.0'	-	19.4	5.20	8.53	-	-
"			6.9-7.9'	-	90.1	8.8	6.68	-	-
○ CSP-7			3.0-4.0'	-	94.4	29.6	31.2	-	-
"			6.5-7.5'	-	170*	43.8	88	-	-
● CSP-8			3.0-4.0'	-	97.3	4.20	11.4	-	-
"			3.0-4.0' (Duplicate)	-	123	N.D.	7.24	-	-
"			6.3-7.3'	-	124	5.0	11.6	-	-
					*TCLP= 0.45 mg/L				

SUMMARY OF AVAILABLE DATA FOR PARCEL 128 (500 ASSOCIATES/FORMER VERMONT AMERICAN SITE)

M. Levy
8/25/10

(See table legend at bottom)

Boring No.	Bor./Sample Location	Sample I.D.	Sample Interval(s)	Arsenic	Chromium	Hex.Chrom.	Lead	Nickel	Cyanide
Chrome Plating Area #3									
○ CP-3-1			3.0-4.0'	-	28.1	N.D.	8.59	-	-
"			6.7-7.7'	-	38.8	N.D.	8.06	-	-
○ CP-3-2			3.0-4.0'	-	40.4	N.D.	12.3	-	-
"			6.7-7.7'	-	64.1	2.4	11.0	-	-
Former AST Area				Volatile Organic Comound (VOC) Analysis Only					
● FAST-1			3.0-4.0'						
Jackson Street Building				Volatile Organic Comound (VOC) Analysis Only					
○ JSB-1			3.0-4.0'						
"			6.0-7.0'						
○ JSB-2			3.0-4.0'						
"			4.8-5.8'						

Table Legend:

●	= Boring/Sampling Location is Inside of Parcel 128
○	= Boring/Sampling Location is Outside of Parcel 128
	= Value Exceeds EPA Region 9 Residential PRG
	= Value Exceeds EPA Region 9 Industrial PRG
N.A.	= Not Analyzed
N.D.	= Not Detected
-	= Not Analyzed or Not Reported