



## SUMMARY OF FACTS

### General Site Description

Tub Mill Farms and Clearview Farms, here in identified as the ‘Site’, is located in Elk Lick Township, Somerset County, Pennsylvania. The Site is split between two tax parcels. The first parcel, Tub Mills Farms, is Tax Parcel ID No. S14-012-009-00, here in identified as ‘Parcel A’, located off of Spring Rd (State Route 669) and is 122 acres, with approximately 11 acres containing potentially hazardous material. The second parcel, Clearview Farms, is Tax Parcel ID No. S14-007-046-00, here in identified as ‘Parcel B’, located off Oak Dale Rd and is 390 acres, with approximately 10 acres containing the potentially hazardous material. The image below identifies the areas of interest containing the potentially hazardous material.

The potentially hazardous material being stored on the Site includes, but are not limited to, chemically treated utility poles and railroad ties, estimated over several thousand. The materials at the Site are believed to have been delivered by or through Mr. Terry Brenneman, L&K Industries, Inc. (d/b/a L&K), Bridgewell Resources, LL, Nor Pac Enterprises, Inc., North Pacific Group, Inc., or Tub Mill Farms, Inc. (D/b/a Tub Mill Farms), here in collectively as the “Transferees” to the site from 2002 to present.



### Site Geology

The Site is located at the center axis of a syncline. Parcel A bedrock consists of the Monongahela Group, specifically the Pittsburgh Coal, which is limited to a region directly adjacent to the area containing the potentially hazardous material. The remainder of Parcel A and Parcel B consists of the Casselman Formation. The Casselman Formation consists of cyclic

sequences of shale, siltstone, sandstone, red beds, thin, impure limestone, and thin, nonpersistent coal.

The Site is located 1-2 miles west of West Salisbury, PA. Parcel A is situated less than 0.5 miles south of the Tub Mill Run and northwest of the Casselman River. Parcel B is situated less than 0.5 miles south of the Tub Mill Run River and north of an unnamed tributary of Tub Mill Run River.

Within Parcel A, there are 2 mine drainage basins adjacent to the pile of, but not limited to, utility poles. The Old Tub Mill Mine is located on Parcel A. Coal was mined from the Elk Lick, Barton, Harlem, and Lower Bakerstown coal seams. The mine appears to have ceased operations around 2010 based on historical images.



## Site History

Several investigations have been performed by PA DEP's Waste Management Program. Inspections conducted between 1995 to 2016 revealed continued violations of the PA Solid Waste Management Act and Clean Streams Law. The inspections noted that the Site was processing, transferring, and disposing of, but not limited to, utility poles and railroad ties without a valid permit. An Administrative Order (AO) was issued on August 13, 2002, to address the violations. The AO required Tub Mill Farms to cease the acceptance and transportation of waste to the Site. Subsequent inspections by the DEP's Waste Management Program identified that the site was in violation of the AO with the acceptance of new utility poles transported to the Site. A Consent Order and Agreement (CO&A) was signed on October 27, 2014, to address the removal of all utility poles and railroad ties within 6 years. In October 2016, BOI took samples of the utility poles, railroad ties, and soil on the site. Analyses, shown in Table 1 and Table 2 below, indicate that hazardous chemicals, as identified in 40 CFR, have leached into the soil. Multiple visits to the Site in 2022 confirmed that the utility poles and railroad ties are still present in violation of the CO&A.

A more detailed timeline of inspections, enforcements, and sampling are as follows:

- 1995/11/18 – Complaint investigation for illegal disposal of railroad ties and utility poles within the Site.
- 1999/04/01 – Consent Assessment of Civil Penalty
- 2002/03/13 – Inspection report documenting sorting, sizing, and removal of scrap metal from used railroad ties and utility poles.
- 2002/04/01 – An NOV was issued for operating a waste storage, processing or disposal facility without a permit and for dumping or disposing of solid waste onto the ground.
- 2002/08/13 – Administrative Order for L&K Industries, Inc. to cease acceptance of all wastes and to cease transportation of wastes including railroad ties and utility poles. AO required submittal of a complete inventory and the removal of no less than 3,000 railroad ties or utility poles per month and complete removal within 18 months. States approximately 50-100,000 railroad ties are present.
- 2003/11/26 and 2004/02/26 – Follow-up Inspections to determine compliance with the 2002/08/13 AO. The inspection reports noted that most of the utility pole and railroad were auctioned off on Oct. 25, 2003. However, utility pole, railroad ties, and waste debris remain on site.
- 2004/06/03 – Follow-up Inspection report documenting the site was not in compliance with the 2002/08/13 AO. Utility pole and railroad ties remain and the report documented new ones had been brought onto the site.
- 2005/03/18 – Follow-up Inspection report documenting a large volume of utility poles had been transported onto the site [Clearview Farms; Parcel B] and dumped on the ground since the 2004/06/03 inspection. The report stated utility poles and railroad ties are being dumped, stored, processed, and disposed at the site [Tub Mill, Parcel A]. Report identified continued violation of the 2002/08/13 AO.
- 2009/06/10 – Complaint Inspection report documenting that some railroad ties and utility poles had been removed, but a majority still remain and continue violation of the 2002/08/13 AO.
- 2010/04/22 – Inspection report documenting continued violations. There were still thousands of railroad ties, utility poles, and wooden pallets on the site of poor condition. No observable change since previous inspection. The inspection report noted violations of the 2002/08/13 AO.
- 2010/10/05 – An NOV was issued for violations observed during routine inspection on 2010/04/22.
- 2010/11/03 – Bureau of Forestry responded to a fire at Clearview Farms (Parcel B) which burned approximately four acres of ground including two large piles of railroad ties and a large pile of junk and debris.
- 2011/05/24 – Inspection Report documenting continued violations of the 2002/08/13 AO. No observable changes to the site since previous inspection.

- 2011/07/14 – NOV was issued for violations observed during 2011/05/24 inspection.
- 2011/11/03 – Inspection Report which identified continued violations of the 2002/08/13 Administrative Order.
- 2011/11/07 – An NOV was issued for violations observed during 2011/11/03 Inspection.
- 2011/11/10 – Administrative Order was issued to Ronald and Nancy Brenneman determining prior enforcement actions since November 1995. [Parcel B]
- 2011/12/15 – Administrative Order was issued to Terry Brenneman determining prior enforcement actions since November 1995. [Parcel A and B]
- 2012/03/08 – An NOV was issued to Terry Brenneman for failure to comply with the 2011/12/15 AO. An NOV was issued to Ronald and Nancy Brenneman for failure to comply with the 2011/11/10 AO.
- 2012/03/22 – Civil Penalty Assessment was mailed to Terry, Ronald, and Nancy Brenneman.
- 2014/04/29 – A CEI inspection was conducted and identified that the site an NPDES permit for industrial stormwater. The inspection report noted a creosote odor from the site, a sheen on standing water, tannin colored water near chipped wood piles, and runoff from the storage piles.
- 2014/06/04 – An NOV was sent for failure to obtain an NPDES permit before discharging industrial stormwater.
- 2014/10/27 – CO&A was entered between PA DEP, Terry L. Brenneman and Tub Mill Farms. A summary of the agreed terms are as follows: cease all acceptance of waste, remove all ties, poles, and related materials from the site within six years. Establish an Escrow account for the removal of material, soil testing and removal of contaminated soil, for fuel, maintenance and employment directly relating to removal efforts.
- 2015/03/13 – An inspection was conducted to determine compliance with the 2014/10/27 CO&A and waste management regulations. The inspection identified erosion from water runoff. The inspection report states that there was no observable change in the amount of material on site since the 6/18/2012 inspection. An NOV was issued for violations of the 2014/10/27 CO&A and waste regulations.
- 2015/08/24 – A Demand letter, with an assessed penalty amount, was sent via certified mail for failure to comply with 2014/10/27 CO&A to Terry Brenneman. An affidavit of service was signed by Terry Brenneman on 2015/10/01 acknowledging receipt of the demand letter.
- 2016/07/16 – Inspection Report to determine compliance with the 2014/10/27 CO&A. Inspection report stated there had been no observable change in the site inventory.
- 2016/10/11 – BOI collected samples of railroad ties, utility poles, and soil for analysis. Soil samples were taken from the north end of the site. Soil analysis results identified the presence of arsenic, barium, cadmium, chromium, lead, and a variety of organic chemicals. Analysis of the utility poles identified the presence of chromium, lead, and a

variety of organic chemicals. Analysis of the railroad ties identified the presence of various organic chemicals. See Table 1 and Table 2 below for the summary of results.

- 2018/07/11 – HSCA 503 Letters were sent via certified mail.

Results from the 2016/10/11 Sampling Event

**Table 1: GI-05-14-50 Soil Sample Results**

Soil Sample No.	Chemical Name	µg/kg	mg/kg	MSCs* (mg/kg)	MSCs** (mg/kg)
2367279	Naphthalene	42.6	0.0426	13	66
2367280	1-Methylnaphthalene	186	0.186		
	Methylnaphthalene	350	0.35	57	240
	Acenaphthene	58.4	0.0584	13,000	190,000
	Anthracene	39.4	0.0394	66,000	190,000
	Benz(a)anthracene	156	0.156	6.1	130
	Benzo(a)pyrene	52.3	0.0523	4.2	91
	Benzo(b&j)fluoranthenes	287	0.287	3.5	76
	Benzo(e)pyrene	137	0.137		
	Benzo(g,h,i)perylene	41.4	0.0414	13,000	190,000
	Benzo(k)fluoranthene	63	0.063	3.5	76
	Chrysene	464	0.464	35	760
	Dibenzo(a,h)anthracene	18.4	0.0184	1	22
	Dibenzofuran	263	0.263	220	3,200
	Fluoranthene	968	0.968	8,800	130,000
	Fluorene	138	0.138	8,800	130,000
	Indeno-1,2,3-cd-pyrene	64.6	0.0646	3.5	76
	Naphthalene	160	0.16	13	66
	Pentachlorophenol	1,230	1.23	47	230
	Phenanthrene	1,100	1.1	66,000	190,000
	Pyrene	404	0.404	6,600	96,000
2367281	Arsenic	12,600	12.6	12	61
	Barium	51,700	51.7	44,000	190,000
	Cadmium	538	0.538	110	1,600
	Chromium	8,610	8.61	III = 190,000	III = 190,000
				VI = 37	VI = 180
	Lead	--	0.631(mg/l)		
Lead	19,200	19.2	500	1,000	

\*Soil direct contact – Residential Surface Soil

\*\*Soil direct contact – Non-Residential Surface Soil

Table 1, above, identifies the analytical results from the soil sampling. The soil samples were collected at the north end of the site. MSC values represent the residential-direct contact (0-15 feet) and non-residential-direct contact (0-2 feet). Numbers highlighted in red are above the statewide health standards. Table 2, below, displays the analytical results from sampling of telephone poles and railroad ties. MSC values for non-residential-direct contact (0-2 feet) and residential aquifers are also listed for reference.

**Table 2: GI-05-14-50 Material Sample Results**

Pole/Tie Sample No.	Chemical Name	mg/kg	µg/L*	MSCs (mg/kg)**	MSCs (ug/L)***
2367276 Pole	Chromium	7.23	7,230	III- 190,000 VI- 37	100
	Lead	0.883 mg/l		1,000	5
2367277 Pole	1-Methylnaphthalene	861	861,000		
	Methylnaphthalene	1,440	1,440,000	240	6.3
	Acenaphthene	3,140	3,140,000	190,000	2,100
	Anthracene	2,980	2,980,000	190,000	66
	Benz(a)anthracene	1,340	1,340,000	130	0.3
	Benzo(a)pyrene	279	279,000	91	0.2
	Benzo(b)fluoranthene	800	800,000	76	0.18
	Benzo(g,h,i)perylene	45.8	45,800	190,000	0.26
	Benzo(k)fluoranthene	297	297,000	76	0.18
	Chrysene	1,590	1,590,000	760	1.8
	Dibenzo(a,h)anthracene	56.4	56,400	22	0.052
	Dibenzofuran	2,370	2,370,000	3,200	35
	Fluoranthene	8,640	8,640,000	130,000	260
	Fluorene	2,620	2,620,000	130,000	1,400
	Indeno-1,2,3-cd-pyrene	45.1	45,100	76	0.18
	Naphthalene	1,120	1,120,000	66	100
Phenanthrene	11,800	11,800,000	190,000	1,100	
Pyrene	4,390	4,390,000	96,000	130	
2367278 Pole	Naphthalene	447,000 ug/kg		66	100
2367282 Tie	1-Methylnaphthalene	1,470	1,470,000		
	Dimethylphenol	78.2	78,200	10,000	690
	2-Methylnaphthalene	2,610	2,610,000	240	6.3
	2-Methylphenol	93.7	93,700	160,000	1700
	3&4-Methylphenol	244	244,000	3- 10,000	3- 1,700
				4- 16,000	4-170
	Acenaphthene	6,580	6,580,000	190,000	2,100
Acenaphthylene	83.3	83,300	190,000	2,100	

Pole/Tie Sample No.	Chemical Name	mg/kg	µg/L*	MSCs (mg/kg)**	MSCs (ug/L)***
2367282 Tie, continued	Anthracene	11,100	11,100,000	190,000	66
	Benz(a)anthracene	4,500	4,500,000	130	0.3
	Benzo(a)pyrene	1,550	1,550,000	91	0.2
	Benzo(b)fluoranthene	2,940	2,940,000	76	0.18
	Benzo(g,h,i)perylene	271	271,000	190,000	0.26
	Benzo(k)fluoranthene	1,180	1,180,000	76	0.18
	Chrysene	4,960	4,960,000	760	1.8
	Dibenzo(a,h)anthracene	108	108,000	22	0.052
	Dibenzofuran	5,330	5,330,000	3,200	35
	Fluoranthene	27,400	27,400,000	130,000	260
	Fluorene	8,020	8,020,000	130,000	1,400
	Naphthalene	3,580	3,580,000	66	100
	Phenanthrene	37,500	37,500,000	190,000	1,100
	Phenol	326	326,000	16,000	2,000
Pyrene	14,100	14,100,000	96,000	130	

\*Assuming 1 kg = 1 L of water

\*\*Soil direct contact – Non-Residential Surface Soil

\*\*\*Residential used aquifer groundwater

## Exposure Pathways and Data Summary

Utility Poles and Railroad ties are not considered hazardous waste, but the leachate from wood preservative treatment are. There are three main types of heavy-duty wood preservatives, chromated arsenicals, creosote, and pentachlorophenol, used for treating wood of utility poles and railroad ties. In 2008, the U.S. EPA risk assessment for registered pesticides of chromated arsenicals, creosote, and pentachlorophenol had human health risks, but could remain in use provided certain mitigation efforts were taken. In 2019, a draft risk assessment identified chromated arsenicals and creosote to pose an environmental risk. In 2022, U.S. EPA issued a final registration review decision requiring the cancellation for pentachlorophenol's use due to the risks outweighing its benefits and proposed additional mitigation measures for chromated arsenicals and creosote.

Chromated arsenicals (CCA) are a pesticide which includes preservatives containing chromium, copper and arsenic. CCAs pose cancer and non-cancer health risks of concern to workers in wood treatment facilities. Chromated arsenicals pose risks to aquatic invertebrates and plants. The U.S. EPA warns against reusing CCA treated wood and does not recommend burning any CCA treated wood to avoid inhalation of toxic chemicals. Arsenic has high acute toxicity via oral, dermal, and inhalation. Inorganic arsenic is known to be carcinogenic in humans by the oral and inhalation routes of exposure. Chromium VI has high acute toxicity via the oral, dermal, and inhalation route. In significant acute toxicity from chromium VI, it can include death after ingestion. Chromium VI is a significant eye and skin irritant and can be a



carcinogenic when inhaled. Under certain circumstances copper, arsenic, and/or chromium can leach from treated wood into the surrounding soil or water.

Creosote is used as a wood preservative made from the distillation of coal tar. Creosote poses cancer and non-cancer health risks of concern to workers in wood treatment facilities who apply the pesticide, but not for those who handle the wood after treatment. Creosote may pose risks to fish and invertebrates when creosote-treated wood is used in aquatic and railroad structures. The U.S. EPA warns against burning Creosote treated wood to avoid inhalation of toxic chemicals. Creosote has a moderate acute toxicity and moderate eye irritant. Creosote has been shown to exert positive mutagenic effects in vitro and is a B1 carcinogen. Creosote has a variable chemical composition, with over 100 different chemicals, and is applied with different viscosity levels, depending on use for railroad ties or utility poles. Creosote contains PAHs, most of which are non-soluble in water. Benzo(a)pyrene and benzo(k)fluoranthene showed resistance to biodegradation. One study showed that due to the rapid depletion of oxygen under aerobic conditions, anaerobic biodegradation of PAHs can take place due to denitrifying, sulfate-reducing, and methanogenic bacteria.

Pentachlorophenol (PCP) is used as a wood preservative and pesticide. PCP poses cancer and non-cancer health risks of concern to workers in wood treatment facilities. Exposure (and therefore risk) to individuals living near PCP-treated utility poles is expected to be minimal. PCP is highly toxic to aquatic non-target organisms and honeybees, and slightly toxic to avian species, but has expected limited exposure. The U.S. EPA warns against burning Creosote treated wood to avoid inhalation of toxic chemicals. The Risk Assessment & Science Support Branch/Antimicrobials Division Science Chapter for the Reregistration Eligibility Decision Document (RED) for Pentachlorophenol (1999) stated that the average leach rate varies between  $1.76E-4$  and  $6.33E-3$  mg pentachlorophenol/kg leachate/in<sup>2</sup> surface area/day. PCP tends to attach to organic sediment binding more strongly in acidic soils while more mobile in neutral to basic soils. PCP can be transported to surface water and become a drinking water hazard. PCP is acutely toxic to moderately toxic to birds, moderately toxic to small mammals, and highly toxic to aquatic life with known bioaccumulation.

Hazardous substances, such as Naphthalene have been identified within the soil, utility poles, and railroad ties posing potential contamination. Medium-Specific Concentrations (MSC) for arsenic have been identified above Statewide Health Standards. The current/or potential threats to human health or welfare is the direct contact of the contamination to persons entering the area where the material is being stored or from the inhalation of hazardous chemicals if the piles are burned. The current/or potential threat that could adversely affect the environment is contamination of the soil, groundwater, and surface water from the material leachate. The Site had a fire during which burned 4-acres of land, railroad ties, junk, and debris in November 2010 releasing hazardous chemicals into the air.

## **RESPONSIBLE PERSONS**

The following "person"(s), as defined by Section 103 of HSCA, has/have been identified at this time as being possible responsible persons, pursuant to Section 701 of HSCA. Each responsible person, identified below, is entitled to legal notice under Section 501(a) of HSCA.

- (1) Verizon Communications, Inc.  
Lowell C. McAdam, Chairman Chief Executive Officer  
Craig Silliman, General Counsel, Law Department  
1095 Avenue of the Americas  
New York, NY 10036
- (2) JPO Somerset Trust  
464 Lincoln Highway West  
Jeannette, PA 15644
- (3) Terry L. Brenneman  
L&K Industries  
9325 Mason Dixon Hwy  
Salisbury, PA 15558
- (4) Ronald D. Brenneman  
1025 Oak Dale Rd  
Salisbury, PA 15558
- (5) Embarq  
Karen Lively, Director  
William A. Owens, Chairman  
100 Centurylink Drive  
Monroe, Louisiana 71203
- (6) George C. McConnaughey, Secretary  
c/o Gregory J. Weiler  
Alltel Communication Corporation  
P.O. Box 2177  
Little Rock, AR 72203
- (7) US Defense Department  
James Farley, Manager  
152 US-206 #2  
Hillsborough Township, NJ 08844
- (8) Naval Weapons Station Earle  
Mary Borree, Director  
201 NJ-34  
Colts Neck, NJ 07722

- (9) NIPSCO  
c/o Corporation Service Company  
135 North Pennsylvania Street  
Suite 1610  
Indianapolis, IN 46204
  
- (10) Tony Glennon/T. Glennon, Inc.  
22 Philhower Road  
Lebanon, NJ 08833-4512
  
- (11) John Oliver  
Via counsel, Ashley Wagner Esq.  
McGrail & Associates, LLC  
1714 Lincoln Way  
White Ok, PA 15131
  
- (12) Bridgewell Resources, LLC  
c/o Les Oakes, Esquire  
King & Spalding, LLP  
1180 Peachtree Street< N.E. Suite 1600  
Atlanta, GA 30309
  
- (13) NJ/NY Port Authority  
4 World Trade Center, 18<sup>th</sup> Floor  
150 Greenwich Street  
New York, NY 10007

## **FINDINGS AND AUTHORITY TO ACT**

The Department has determined that the heavy-duty wood treatments of creosote, chromatic arsenicals, and pentachlorophenol, have leached into the soil surrounding the storage area of the railroad ties and utility poles. Although the leaching of railroad ties and utility poles can be limited when the material is used as is intended, the sheer volume of utility poles and railroad ties located on the Site poses an environmental threat. The analyses of the soil indicate that hazardous substances and metals are being leached from the utility poles and railroad ties and may be migrating through surface and groundwater.

## REFERENCES

Geology – PaGEODE Pennsylvania GEOlogic Data Exploration Geological Survey.

Mine information - [Pennsylvania Mine Map Atlas \(psu.edu\)](https://www.minemaps.psu.edu/) <https://www.minemaps.psu.edu/>

Reregistration Eligibility Decision for Chromated Arsenicals. United States Environmental Protection Agency. Washington, D.C. September 2008.

Reregistration Eligibility Decision for Creosote. United States Environmental Protection Agency. Washington, D.C. September 2008.

Review of the effects of post treatment processing on leaching of metals from wood following chromated copper arsenate (CCA) or acid copper chrome (ACC) treatment. United States Environmental Protection Agency. Washington, D.C. November 4, 2004.

November 18, 1995 Complaint entered into DEP Complaint Tracking System (CTS 90405)

April 1, 1999 Consent Assessment of Civil Penalty, cited in the November 10, 2011 Order

March 13, 2002 Inspection Report, cited in the August 13, 2002 AO and May 23, 2002 Inspection Report.

April 1, 2002 Notice of Violation, cited in the August 13, 2002 AO

August 13, 2002 Administrative Order by Anthony D. Orlando, DEP Waste Management SW Regional Manager

November 26, 2003 Follow-up Inspection Report by William Shawley, DEP Waste Management Specialist

February 26, 2004 Follow-up Inspection Report by William Shawley, DEP Waste Management Specialist

June 03, 2004 Follow-up Inspection Report by William Shawley, DEP Waste Management Specialist

March 18, 2005 Follow-up Inspection Report by William Shawley, DEP Waste Management Specialist

June 10, 2009 Complaint Inspection Report by William Shawley, DEP Waste Management Specialist

April 22, 2010 Inspection Report by Michael Planinsek, DEP Waste Management Specialist

May 11, 2010 Notice of Violation by Michael Planinsek, DEP Waste Management Specialist

November 3, 2010 Report of Investigation by Brian Vinski, DCNR Forest Fire Specialist Supervisor

May 24, 2011 Inspection Report by Michael Planinsek, DEP Waste Management Specialist

July 14, 2011 Notice of Violation by Michael Planinsek, DEP Waste Management Specialist

November 03, 2011 Inspection Report by Michael Planinsek, DEP Waste Management Specialist

November 07, 2011 Notice of Violation by Michael Planinsek, DEP Waste Management Specialist

November 10, 2011 Order issued to Ronald D. Brenneman and Nancy A. Brenneman issued by Michael Forbeck, DEP Waste Management SW Regional Manager, served by David Leiford, DEP Solid Waste Specialist Supervisor

December 15, 2011 Administrative Order issued to Terry L. Brenneman issued by Michael Forbeck, DEP Waste Management SW Regional Manager, served by David Leiford, DEP Solid Waste Specialist Supervisor

March 8, 2012 Notice of Violation issued to Terry L. Brenneman by David Leiford, DEP Field Operations Supervisor, Bureau of Waste Management

March 8, 2012 Notice of Violation issued to Ronald D. Brenneman and Nancy A. Brenneman by David Leiford, DEP Field Operations Supervisor, Bureau of Waste Management

March 22, 2012 Consent Penalty Assessment by Michael Forbeck, DEP Waste Management SW Regional Manager

April 29, 2014 CEI Inspection Report by Lisa Misop, DEP Water Quality Specialist

June 4, 2014 Notice of Violation by Lisa Misop, DEP Water Quality Specialist

October 27, 2014 Consent Order and Agreement for Terry L. Brenneman and Tub Mill Farms by Michael Forbeck, DEP Waste Management SW Regional Manager

March 13, 2015 Inspection Report and Notice of Violation by Michael Kaufman, DEP Waste Management Specialist

August 24, 2015 Demand Letter to Terry Brenneman by Michael Forbeck, DEP Environmental Program Manager, Waste Management; Affidavit of Service given by Michael Planinsek, DEP Solid Waste Specialist Supervisor, to Terry Brenneman, signed October 1, 2015.

July 16, 2016 Inspection Report by Michael Kaufman, DEP Solid Waste Specialist

October 11, 2016 Investigation by Tony Martinelli, BOI's EGM, and Bruce Gearhart, EPS, and Corresponding analysis