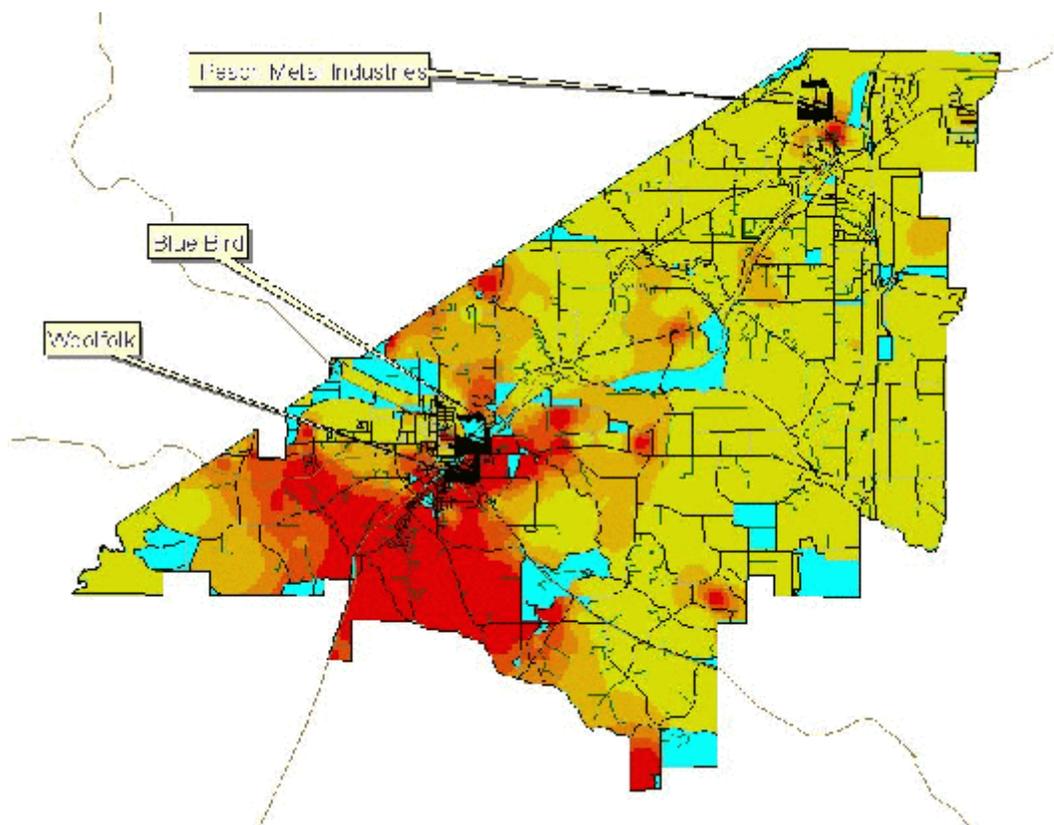


Analysis of Environmental Justice Issues in Peach County, Georgia



Environmental Background Information Center
Draft - October 31, 2001

Introduction

The Woolfolk Citizens Response Group (WCRG) is an organization formed to address community concerns surrounding the presence of the Woolfolk Chemical Works National Priority List (NPL) Superfund toxic waste site in Fort Valley, Georgia. Because of its experience with that site, WCRG has expanded its role over time to look at threats to the health, well being and future community development of Fort Valley and Peach County. The WCRG is assisting the Middle Georgia Advisory Group, a grassroots group in neighboring Byron, organize around such issues as a proposed regional landfill and an existing toxic waste site. In furtherance of these goals, the WCRG asked the Environmental Background Information Center to assist them by characterizing the nature of the threats posed by environmentally dangerous industrial activities throughout Peach County. This report addresses existing and potential treats and provides a demographic portrait of the neighborhoods most directly impacted.

Background

Fort Valley, GA, a company town in Middle Georgia, is in Peach County (pop 23,688). According to 2000 U.S. Census Statistics, Peach County is 45.4% African American. Georgia is 28.7% African American. Fort Valley is predominantly African American (74.7%). 8,005 people reportedly lived in Fort Valley in 2000. 5,816 of that total population (72.7%) are of voting age. The voting age population in Fort Valley is 72% African American.

The Woolfolk Chemical Works site in Fort Valley has been undergoing cleanup operations for a number of years. Ongoing public concerns about cleanup activity at the site led to the formation of the Woolfolk Citizen's Response Group. WCRG offers a community forum around Superfund and related social justice issues and has been involved in a wide range of activities including: acting as liaison between the EPA and the community; identifying potential sources of contamination; hosting public meetings; retaining a technical advisor on groundwater issues; testifying before church councils; and participating in the National Relocation Round Table in Pensacola, Florida and an International Toxic Exchange with a group from Sydney, Nova Scotia.

The WCRG, in the course of its organizing efforts around the Superfund site, became aware of other potential hazardous activities that may be impacting on their community. Specifically, the threat posed by the Blue Bird Bus facility, including an existing contamination problem on the Blue Bird grounds. As well, WCRG is assisting the grassroots organization Middle Georgia Advisory Group to document the potential impact of another contaminated site (Peach Metal Industries) and a proposed landfill (backed by David Aldridge's Regional Properties) in Byron, Georgia.

This report proceeds to portray what is known about these various sites and activities thereon and the neighborhoods around them. The report concludes with specific recommendations for dealing with problems and issues identified by WCRG

History of Woolfolk Superfund Site Fort Valley, GA

In 1921, John W. Woolfolk founded a company that, in 1941, became Woolfolk Chemical Works, Ltd. (WCW). Woolfolk was a general partner in WCW, which manufactured liquid, powdered and granular pesticides at the Fort Valley site from 1942 to 1972. Arsenic was among the chemicals used by WCW to make pesticides for the peach and pecan industries as well as for lawn and garden markets.

In 1942, Woolfolk established three *inter vivos* trusts for which Fulton National Bank of Atlanta, a predecessor to NationsBank, became co-trustee. Together these trusts held greater than 50 percent of the WCW limited partnership interests. Five years after Mr. Woolfolk's death in 1945, Fulton Bank was named trustee of the Woolfolk Trust, which held as an asset Mr. Woolfolk's general partnership interest in the company.

In 1972, WCW incorporated, and as part of this process sold all its assets to Woolfolk Corp. In 1977 Canadyne Corp. (later renamed Canadyne-Georgia Corp.) purchased Woolfolk Corp. Reichold Chemicals Inc., a partner in Canadyne, was a subsidiary of the giant Dainippon Ink & Chemicals Co in Tokyo. Reichold (which became Canadyne's corporate parent by taking over the joint venture) sold the pesticide business and most of its assets in 1984 to SureCo Inc. SureCo continued to manufacture organic pesticides there. Subsequently, Fulton National Bank delivered the trusts to the daughters.

Woolfolk Operations

According to the U.S. E.P.A documents,

The Woolfolk Chemical Works, Inc., Site covers 18 acres near the center of Fort Valley, Peach County, Georgia. The company began operation in 1910 as a lime-sulfur plant and has evolved into a full-line pesticide plant formulating pesticides in liquid, dust, and granular forms for the agricultural, lawn, and garden markets. The methods of handling these products over the years have resulted in extensive contamination at the site. Tests conducted by the Georgia Environmental Protection Division in 1985 and 1986 detected metals and pesticides, including lead, arsenic, chlordane, DDT, lindane, and toxaphene, in on-site soil and ground water, and in an open ditch south of the plant.

The Woolfolk facility produced organic and inorganic insecticides including arsenic and arsenic trichloride. Operations expanded during the 1950s to include the formulation of various organic pesticides, including DDT, lindane, toxaphene, and other chlorinated pesticides. These organic pesticides and other insecticides and herbicides were formulated, packaged, or warehoused at the facility. (U.S.E.P.A, Record of Decision (ROD) Abstract, ROD Number: EPA/ROD/R04-95/246, 09/29/95)

Area residents report that employees often were asked to unload powdered arsenic out of rail cars upon delivery, releasing clouds of dust into the neighborhood. As described above, an open ditch, drained runoff from the site into Big Indian Creek.

Early tests indicate contamination

Site activities invited complaints from neighbors as early as 1971. Public water supply tests for possible contamination are indicated in the documentary record going back to 1970. In 1984, the GA DNR issued a Notice of Violation for Woolfolk. Increasing documentary traffic regarding public water supply contamination begins in 1984.

Three of the five Fort Valley municipal water supply wells are within 1,000 feet of the facility. The system is the sole source of water in the area. Late in 1986, EPA found arsenic and lead in two of the wells at levels below Federal drinking water standards. An estimated 10,000 people obtain drinking water from municipal wells within 3 miles of the site. State records indicate numerous instances where untreated industrial waste was discharged into surface waters. During a routine inspection in 1979, EPA discovered that the facility was discharging unauthorized waste water from the production of the pesticide dichlorobromopropane into Bay Creek. Records indicate that the majority of the waste waters were discharged into a storm sewer on the site. These effluents would flow into an open ditch located south of the plant and then into Big Indian Creek.

EPA completed a preliminary Assessment of Woolfolk Chemical in June 30, 1984 and issued a Notification of a potential hazardous waste site in July 1984. The Woolfolk site was proposed for the National Priorities List on June 24, 1988 and listed as final on August 30, 1990.

Site Cleanup Activity:

Between 1986 and 1987, Canadyne removed more than 3,700 yards of contaminated soil, capped an area of contamination and removed several contaminated structures. Between 1990 and 1995, the Environmental Protection Agency issued orders requiring that Canadyne perform remediation activities at the site.

According to a June 30, 1994 *Business Wire* report, Canadyne postponed remediation work in 1994 in order to purchase several additional residential properties to create a parcel of land suitable for commercial redevelopment. The parcel was the northern two-thirds of the block bounded by MLK Drive, Fagan Street, Oak Street, Troutman Street, and Commercial Heights Parkway. "By converting the land use from residential to commercial, Canadyne can take advantage of cleanup cost savings. Commercial property cleanup standards are less stringent (30 ppm arsenic in soil is protective of human health in a residential setting whereas 100 ppm arsenic is protective of human health in a commercial setting)."

Health Issues?

The documentary record indicates that the ATSDR conducted a health analysis, a so-called Preliminary Health Assessment, apparently released in late March, 1992. Records indicate a Memo from Cody Jackson to Ned Jessup both of Region IV accompanied two copies of this document on April 2, 1992. EBIC has thus far not been able to locate and examine this

document. The report appears to have been supplanted by a Baseline Risk Assessment in 1995-96 (ostensibly describing a different "operating unit - #3") issued in 1996. Recent health documents have apparently been issued by ATSDR. In addition, Dr Howard Frumkin of the Emory School of Medicine indicated in an interview that additional health documents may be available in the community. Dr. Frumkin also stressed that skin lesions apparent in the Fort Valley community appeared to be caused by arsenic and not dioxin contamination.

An EPA poster child of cleanup and community cooperation?

EPA has used the cleanup and construction of a library on demolished and rehabilitated residential property as a high point in the cleanup.

As a result of the conversion of residential properties to non-residential use, EPA issued a second ROD in September 1995 which integrated the redevelopment of these properties into a library, an adult education center, and a Welcome Center for the City. Construction of the library began in October 1996 and was completed in 1998. The welcome center for the City is currently under renovation. In addition, the installation of the groundwater pump and treat system was conducted in 1998. The system is currently operational and functional.

However, this development is not without its coercive elements. The library and a planned literacy center are based on a legal "agreement and covenant not to sue between the U.S. EPA and the Fort Valley Redevelopment Authority, the Peach County Chamber of Commerce and the Peach Public Libraries Board of Trustees." This contractual structure is similar to one that EPA issued at the start of the repopulation of the Love Canal neighborhood (renamed Black Creek) in New York. EPA does not want to get sued if people get sick on property they supposedly had cleaned up.

Clean Sites Role?

Clean Sites, Inc. (CSI) has been involved in the cleanup activity at Woolfolk. Clean Sites was founded in 1984 by a coalition of chemical companies and conservative nature groups, CSI gets over 80% of its funding from grants and payments for services from the chemical industry. Its purpose is to bring "a third-party objectivity to the complicated, often emotionally charged process of hazardous waste site cleanup."

EPA documents show unapproved activity during cleanup by Clean Sites Inc, on May 1, 1992. During this period, monthly progress reports by Richard Sobel of CSI were addressed to Cheryl Smith of USEPA region 4 from September 1991 through March, 1993 at which point Cheryl is no longer listed as recipient. Timothy Woolheater is recipient in March 1993 of next letter from Richard Sobel in sequence through June 1995.

Research suggests Ms. Smith should be contacted regarding her role and views in the cleanup effort. She may be at GA EPD. Significantly, her departure from the scene appears to coincide with the emergence of a sequence of EPA orchestrated public relations events including "open houses," "group meetings," and the formation of a "community information exchange group."

Her departure also predates the release of the “Record of Decision” which apparently has been “recalled” and is under redraft. These developments (setting aside Ms. Smith’s untimely departure from the scene) all follow approximately 5 years of intensive communication between EPA and the site operators (and Clean Sites’ Mr. Sobel in particular) during which time the operators controlled access to the site and all cleanup options implemented, only paying a \$750 fine for one apparent transgression.

There is very little in the documentary record to indicate public participation in anything but the final stages of cleanup, and well after emergency remediation.

Cleanup and Hazard Liability

EPA documents identify several recipients of letters informing them that the EPA has identified them as “potentially responsible parties.” This means these entities have been identified as financially responsible for the contamination at the site. They are:

Boots-Hercules
Canadyne Georgia
Marion Allen Corp
Nor Am Chemical
Peach County Properties
SureCo

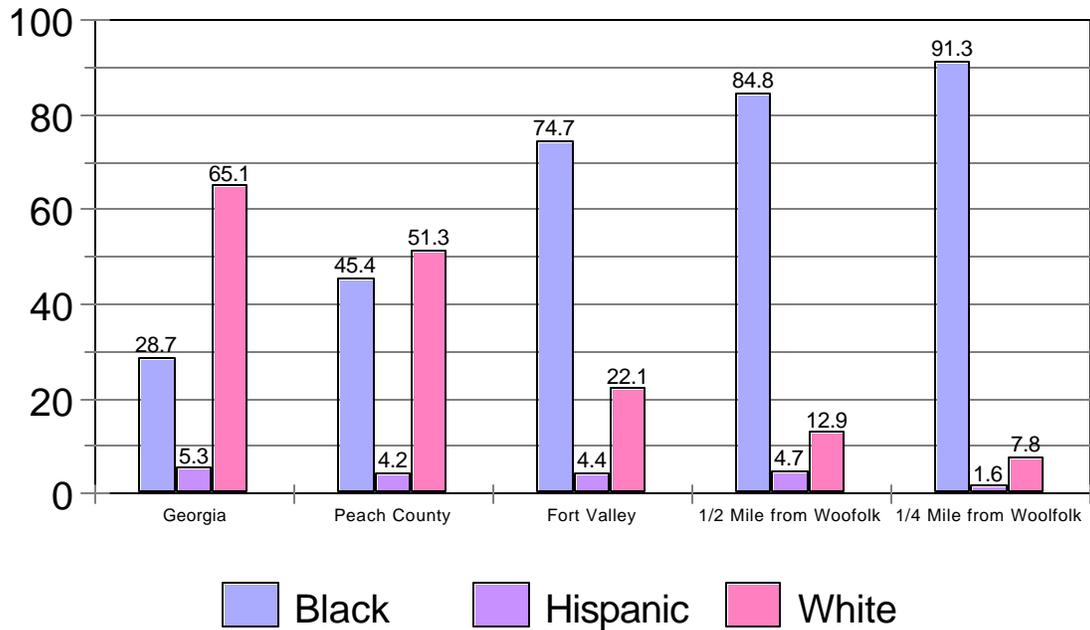
A 1994 class action filed by Fort Valley plaintiffs accused three generations of owner-operators of committing a trespass on their properties, creating a nuisance by contaminating their properties, negligence, engaging in abnormally dangerous activities, diminishing the value of their properties, conspiring to contaminate the area and failing to take proper remedial steps to clean up the site. No further information was available at the time of this writing on the status of this suit.

In 1996, Canadyne sued the bank, the Woolfolk Trust, WCW, and certain former WCW partners to recover its cleanup costs under CERCLA sec. 107(a) and 113(f), the Georgia Hazardous Site Response Act (HSRA) and other state law claims. The U.S. District Court for the Middle District of Georgia dismissed the suit against the bank on the grounds that it was not a covered “person” under CERCLA and the HSRA. Canadyne appealed to the Eleventh Circuit. No further information was available at the time of this writing on the status of this appeal.

Population Composition of Woolfolk Area

Neighborhoods immediately adjacent to the Woolfolk facility are predominantly African American. Census Blocks whose boundaries fall within 1/4 mile of the facility grounds are over 90% African American, as opposed to Fort Valley, which is almost 75% African American; Peach County, which is just over 45% African American; and Georgia which is almost 29% African American. 2000 Census data indicates that the area immediately to the southwest of the Woolfolk facility is one of the most densely populated areas in Peach County (see Appendix B).

Demographic Profile of Woolfolk Area



Woolfolk Summary:

Extensive contamination of the area has caused human health damage. Skin lesions associated with arsenic contamination have been identified in the population. Cleanup activities include demolition of structures, removal, onsite and offsite burial, offsite incineration, groundwater pumping and still others. Onsite in-situ stabilization has been proposed for still existing contamination problems. Because cleanup activity has been controlled by the site owners and their contractors, the assessment of contamination levels and the thoroughness of cleanup may not be as complete as it may have been if the EPA had actively been in control of the site. A large human population, predominantly African American, still lives in close proximity to the site. The most densely populated neighborhoods in the county are within 1 mile of the site. Several schools, day care centers, and/or hospitals are also within a short distance from the site location. Cleanup plans are apparently still in revision, suggesting that past cleanup activities have failed to remediate existing contamination. This is clearly an environmental justice case.

Blue Bird

Blue Bird Corporation is based in Fort Valley, GA and is over 70 years old. According to Blue Bird's web site, "In 1927, A.L. Luce, Sr. created the first Blue Bird school bus in Fort Valley, Georgia. Over seventy years and 400,000 buses later, the Blue Bird Corporation leads the world in school bus production."

The company claims to have two million square feet of production space at five U.S. plants. Blue Bird also manufactures motorcoaches for commercial carriers and large recreational style buses for individual consumers.



Blue Bird was family-owned until 1992, when Merrill Lynch Capital Partners paid about \$400 million to buy the firm from the heirs of founder A.L. Luce. Merrill Lynch in turn sold Blue Bird in 1999 for \$665 million (\$ 428 million in cash and \$ 237 in assumed debt) to Henlys, the British bus and truck manufacturer. Richard E. Maddox, Vice President--Sales of the Company, said, in March, that Blue Bird accounted for 8 percent of Henlys' operating profit.

Blue Bird's operation in Fort Valley releases thousands of pounds of toxic and dangerous chemicals into the air on an annual basis. Over the period from 1987-1999, facility operators have reported to the U.S. EPA the release of nearly 1 million pounds of fugitive air emissions that can be expected to have drifted with prevailing winds into adjacent neighborhoods.

Blue Bird Chemical Emissions 1987-1999

<u>Chemical Name</u>	<u>Number of Release Years</u>	<u>Fugitive Air Releases (lbs)</u>	<u>Stack Air Releases (lbs)</u>
ACETONE	7	76922	199563
BARIUM COMPOUNDS	4	0	6776
CERTAIN GLYCOL ETHERS	10	46255	311568
DIISOCYANATES	3	15	15
ETHYLBENZENE	1	750	9169
ETHYLENE GLYCOL	5	2250	0
METHANOL	10	45257	69451
METHYL ETHYL KETONE	7	35494	80398
METHYLENEBIS(PHENYLISOCYANATE)	2	1016	22896
N-BUTYL ALCOHOL	13	3750	205221
TOLUENE	13	661312	359206
XYLENE (MIXED ISOMERS)	13	55918	355908
ZINC COMPOUNDS	4	755	1000
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		929694	1621171

Source: US EPA TRI data, 1987 - 1999

The company reported over 1.6 million pounds of stack air emissions in that same period. Stack air emissions may be of less concern than fugitive air emissions to people residing in the immediate vicinity of the plant. The impact of both stack and fugitive emissions on local neighborhoods would be dependant on weather conditions, the height of the stacks, topography,

ground cover and a number of other localized factors (see Appendix A). Of additional interest is the fact that slightly less than 1.2 million lbs of waste were transferred offsite for disposal.

The Blue Bird facility in Fort Valley has not reported releases of chemicals to surrounding surface waters or to the Fort Valley Sewage Treatment Facility. However, substantial evidence indicates groundwater contamination beneath the Blue Bird plant. The sources, extent, and nature of that contamination have been reviewed at this writing. The plant property was listed in 1983 as a potential toxic waste site. The listing of the Blue Bird facility in itself is not particularly noteworthy, as about 40,000 odd sites have been listed over time as potentially toxic sites. Nonetheless, it is worth noting that --- at about the time of the sites listing --- the GA DNR forced Blue Bird to close down a landfill, which they had been using since 1971 on the plant's grounds. Our inquiries regarding the status of the site received a reply from U.S. EPA, which indicated the site had been removed from the Comprehensive Emergency Response Cleanup and Liability Information System (CERCLIS).

The following completed actions were found in the Archive database as of September 12, 2001 for the Blue Bird Body Company site: a discovery on August 1, 1983; a preliminary assessment on March 1, 1984; and a site inspection on May 15, 1987. No contaminants were found in the Archive database for this site... The Archive designation means that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site. (US EPA, Office of Emergency and Remedial Response, Letter from Margret Brown, Information Management Center to Patricia Karam, Sept 12, 2001.)

However, the fact remains that the U.S. EPA has approached the matter of potential contamination at Blue Bird, and the GA State Department of Natural Resources has, more recently, been grappling with contamination problems around the Blue Bird plant.

EPD met with the environmental manager and representatives for the Blue Bird Body Company located in Fort Valley, Georgia in January to discuss Corrective Action objectives for the site. The company is planning to propose a new Corrective Action Plan, which would take place in three stages. In the short term, measures will be implemented to provide hydraulic containment and to mitigate possible off-site release of constituents of concern at the site. The extracted groundwater will be disposed of cost-effectively. The next "phase" of the corrective action will implement measures to reduce the mass of potential on-site sources. Two possibilities for the measures include Soil Vapor Extraction (SVE) and/or Enhanced Bioremediation. The last step of the process could include the implementation of passive measures and/or natural attenuation to address residual levels of constituents of concern. EPD was able to provide feedback and agreed that Blue Bird move ahead with the Corrective Action Plan for the site. The Plan

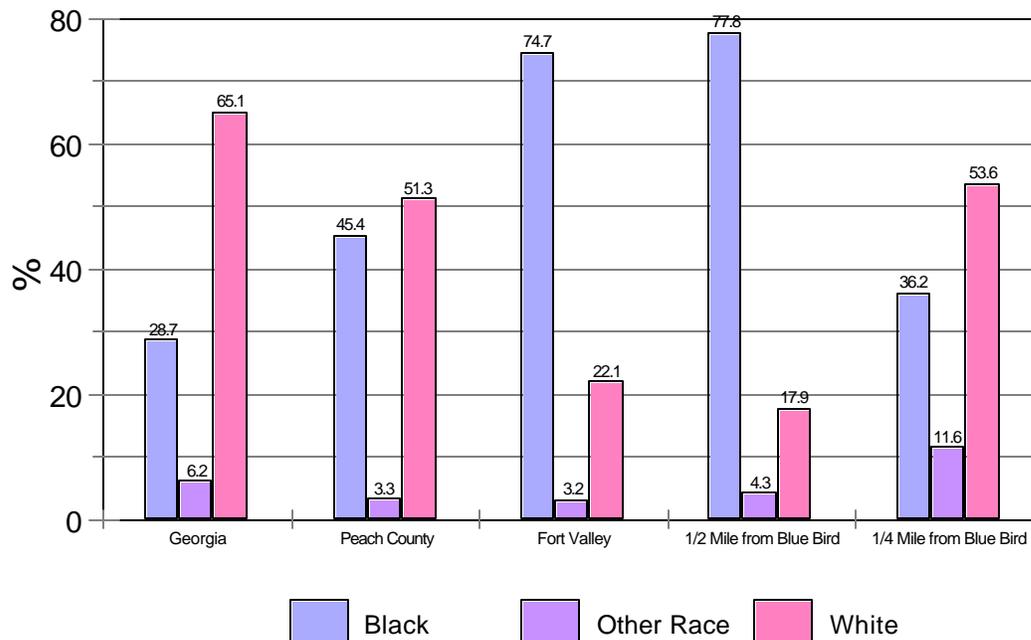
is expected to be submitted to EPD within the next two months. (Monthly Report – January 2001 Hazardous Waste Management Branch, Georgia Department of Natural Resources, Environmental Protection Division, MEMORANDUM TO: Harold Reheis FROM: Jennifer Kaduck DATE: February 13, 2001, p. 11 - 12.)

This situation has recently moved in the direction of enforcement as GA DNR issued a notice of violation for the plant

A Notice of Violation (NOV) was sent this month to **Blue Bird Body Company** facility located in Fort Valley regarding the Draft Class 3 Permit Modification Application (including revised Groundwater Monitoring and Corrective Action Plan). The NOV identified fundamental deficiencies found during the review of the application. Blue Bird has acknowledged receipt of the plan and is working on a timely response. The initial submittal of the Permit Modification by Blue Bird was in response to EPD's March 30, 2000 letter denying the approval of alternate concentration limits (ACLs) at the site and requiring a revised Corrective Action Plan to achieve compliance with their permit. (Georgia Department of Natural Resources, Environmental Protection Division, Monthly Report – July 2001, Hazardous Waste Management Branch, MEMORANDUM TO: Harold Reheis, FROM: Jennifer Kaduck, August 9, 2001, p. 7.)

The key item of concern is that groundwater under the Blue Bird plant is contaminated. The nature, scale, and direction of that contamination are at present unclear. More research is needed. The key questions are: What are the contaminants? What concentration are they found

Demographic Profile of Blue Bird Area



at? Where are the test wells? What direction does the groundwater move in? Are there any drinking water wells in the area?

Population Around Blue Bird

The Blue Bird plant appears to be surrounded within 1/4 mile by a predominantly white neighborhood of 69 people, although a small number of indigenous people live in that radius. Within 1/2 mile of the facility, the African American population increases along with the total number of people (1034) and the population density (4.14 persons/sqmile vs .43 persons/sqmile at 1/4 mile).

Blue Bird Summary

Blue Bird's operations do emit environmental toxicants into the area around the plant. There are air emissions (fugitive and stack) and groundwater emissions (in the form of contamination). There are also offsite shipments of toxic waste that pass through the community. Blue Bird is the largest single source of toxic chemical emissions in the county. Chemicals released into the air include: Toluene, Methanol, Xylene, Ethyl Benzene, Glycol Ethers, and Butyl Alcohol. These chemicals do represent either real and/or suspected risks to public health. The risk to the population as a whole can be expected to vary with the level of exposure (see Appendix A). Workers could reasonably be expected to have the highest levels of exposure, followed by nearby neighbors.

Although no OSHA data contains specific reference to workplace environmental hazards, five of eight inspection reports do suggest problems. Three of these records date from the 1980's and contain no reference to violations. However, the five inspection reports compiled from 1990 - 1999 list one fatality in June, 1992 when William Glenn Davis was crushed by a vehicle. OSHA penalties were issued based on a finding of insufficient written work practice programs (OSHA Inspection Report, Fatality/Catastrophe, 9/18/92). In addition, four other reports beginning in 1991 and spanning to 1999, list serious violations and suggest ongoing problems that neither OSHA penalties nor company efforts have fully corrected.

This taken with the above emissions problems, and ongoing enforcement activities by GA DNR related to non-abatement of ground water contamination, could lead a reasonable person to question whether the owners of Blue Bird take their responsibilities to the community as seriously as they ought.

Byron

Byron, GA is one of two other significant population bases (besides Fort Valley) in Peach County. The community has been beset recently with a proposal to build a 422 acre landfill across from the Benjamin Hawkins Boy Scout Camp on Boy Scout Road, just outside the incorporated limits of Byron. This proposal is in an area of the county that already hosts the contaminated Peach Metal Industries (PMI) properties and Pyrotechnic Specialties, a company which was fined \$15,000 by the state for hazardous waste violations. This section treats these three operations separately in order to describe and characterize their background and status. In terms of a population profile, the analysis is limited to the PMI site, but since both are apparently in close proximity it is fair to assume a fairly similar population profile.

Peach Metal Industries (PMI)

Peach Metal Industries was an electroplating operation run by the DeGraw family from 1971 to September, 1987. The McCord family owned the land, having purchased it from the Air Force in 1967. The property is located just outside the incorporated limits of Byron to the North Northwest. PMI's operations generated considerable hazardous waste, which apparently was allowed to run off the property and into surface waters through an inoperable sewage system. In 1976, GA DNR determined the site was being operated improperly, and ordered a containment system to be installed to prevent this runoff.

The company installed two lagoons but continued to operate improperly and the state failed to carry out oversight. Thus the runoff continued to occur, and wastes continued to accumulate in the lagoons and in barrels stored on sight. In 1987, the state issued a notice of violation against PMI. The owners and operators of the PMI site subsequently closed the facility and filed for bankruptcy. From 1987 through 1991, no significant activity took place on the grounds though an administrative cleanup agreement had been signed in 1987. In 1991, the state issued a final administrative order.

The administrative order required Concrete Sales and the McCord Trust to submit a Part A application for a hazardous waste facility permit, to prepare and implement a groundwater monitoring plan for the site, to prepare an acceptable closure and contingent post-closure plan for the surface impoundments at the site, to submit a Part B application for a permit for the post-closure care of the surface impoundments if necessary, and to satisfy financial assurance requirements for the cost of the closure and post-closure care for the surface impoundments.

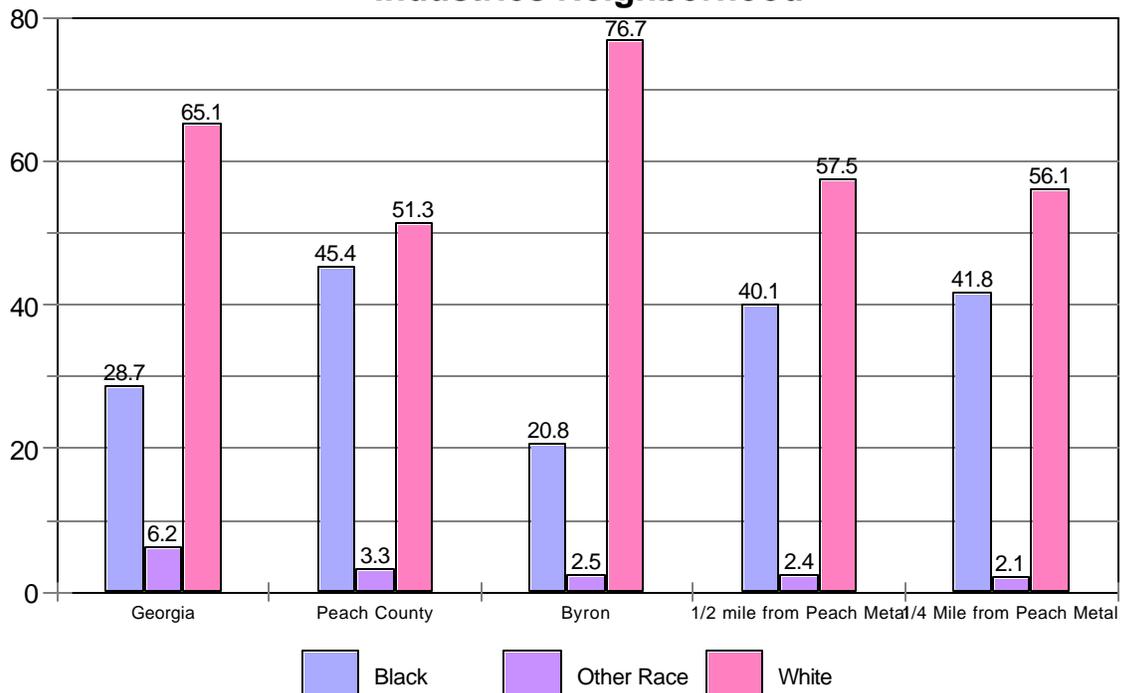
Following the issuance of this order, the state issued a notice of violation in August 1991 and a notice of deficiency in February 1992. GA DNR then issued a final notice of violation to Timothy McCord on September 8, 1992, for failure to comply with certain conditions of Administrative Order No. HW- 645. In that order, GA DNR noted that high concentrations of heavy metals had been detected in groundwater samples collected from the site and that rainfall was a cause of the continuing migration of the hazardous substances from the surface impoundments.

It is important to note that the Blue Bird Company had a financial stake in PMI's operations in the form of two loans issued to PMI by Blue Bird, which kept PMI in operation and able to complete electroplating jobs for Blue Bird. However, several legal appeals established that Blue Bird was not financially responsible for PMI's illegal hazardous waste storage and disposal in Byron.

Blue Bird had a close relationship with PMI: it was founded by a former PMI employee, was PMI's biggest customer, and had lent it money. Nevertheless, the court concluded there was no evidence that "Blue Bird owned, possessed, or even had the ability to control the hazardous substances," or that it "knew or even should have known that PMI was not properly disposing of its hazardous waste." ("Customers of hazardous facility not liable for cleanup costs," American Machinest, Maggi Knox, 11/01/00, p. 80).

Legal documents describe the contamination problem in terms of what was known about PMI's operation, which involved zinc electroplating, cadmium electroplating, aluminum anodizing, and cyanide zinc electroplating. Chemicals involved in these processes are cyanide salts, zinc potassium chloride, zinc chloride, boric acid, and zinc oxide, nitric acid, hydrogen peroxide, sulfuric acid and sodium hydroxide. The processes generated various types of waste waters and sludges which contained residues from the various cleaning, plating and chromium conversion coating stages. It is these chemicals and possibly others which contaminated the PMI property, surrounding surface waters and groundwater. Additional substances may also be present but cannot be ascertained without additional site documentation.

Demographic Profile of Peach Metal Industries Neighborhood



Population around the PMI site

1719 people live in census blocks whose boundaries fall within one (1) mile of the PMI site. 69.3% are white 28.6% are black. Closer to the site, at 1/2 mile, 918 people live, 57.5% of the population is white and 40.1% is black. Thus, at one mile from the site, the population closely resembles the county, but at 1/2 mile and closer, the percentage of minority persons is double the level of the county as a whole.

Aldridge/Regional Properties

David W. Aldridge and his cohorts at Regional Properties have proposed a 424 acre landfill in northeastern Peach County. There are several apparent irregularities in the permit application. As of August 19, 2001, the landfill backers apparently had not put up two required payments, a \$25,000 license application fee and a \$1,000,000 bond deposit as required by the county in order to proceed with the application. Aldridge, through an attorney, has threatened to sue if the county puts up resistance to his landfill business plans. He has also acknowledged that he is brokering the landfill deal but has declined to identify who the other backers to the proposal are. Aldridge and Regional Properties are described as land brokers and have no experience constructing or operating a landfill.

Georgia Secretary of State Corporate Records show that George T. Piercy and Janet Aldridge Piercy (aka Janet R. Piercy) served as officers of various David Aldridge real estate companies in Georgia. Janet Aldridge Piercy is George T. Piercy's widow. She remains an officer of Regional Properties.

Janet's late husband George T. Piercy (he died in 2000) served as a senior VP of the Exxon Corporation. Piercy is tied to two momentous events in Exxon's history. He was the oil industry's top negotiator during the 1973 negotiations during which OPEC oil producers asserted their right to set production levels and prices. In the wake of this set back for the oil industry at the hands of OPEC, Piercy concluded Exxon must diversify and he became the principal advocate inside Exxon of the company's \$2.1 billion blunder that involved Exxon's take over of Reliance.

During his life time, Piercy demonstrated some liberal and ethical attitudes during his life time, serving as Chairman of Educational Broadcasting Inc. in New York City (Channel 13) and as a board member of the Princeton Theological Seminary and the Center of Theological Inquiry at Princeton University.

Perhaps WCRG can seek a meeting with Mrs Piercy and, invoking her husband's ethical concerns, make a case to her for not being a party to environmental injustice in the form of usiny financial power to inflict a landfill on unwilling hosts in Byron.

Pyrotechnic Specialties:

Pyrotechnic Specialties is an explosives manufacturer located at 1661 Juniper Creek Rd. Documentary records reviewed by EBIC seem to suggest that the company was first incorporated in 1968 with officers Alan Berry, Kenneth L. Verble, and Edward L. Deane. That firm was apparently dissolved and reincorporated in 1991 with officer David J Karlson, as head of Pyrotechnics. On February 3, 1998, the state of Georgia fined Pyrotechnics for hazardous waste violations.

Pyrotechnic Specialties, Inc./Byron, Georgia CO# EPD-HW-1290 02/03/98; \$ 15,000/Treated hazardous waste without a permit, failed to mark accumulation start date, failed to show financial responsibility, failed to maintain emergency contingency plan, failed to provide financial assurance for closure or post-closure cost estimate, failed to provide a post-closure/closure plan, failed to notify EPD of hazardous waste activities; Submit revised "Notification of Hazardous Waste Activity", submit closure/post-closure plan, make waste determination of all generated wastes, submit permit application or close waste treatment/storage facilities, mark containers with start accumulation date, report on all solid waste management units, investigate any releases, take necessary corrective action (February Enforcement Summary, GA Environmental Law Letter, April, 1998).

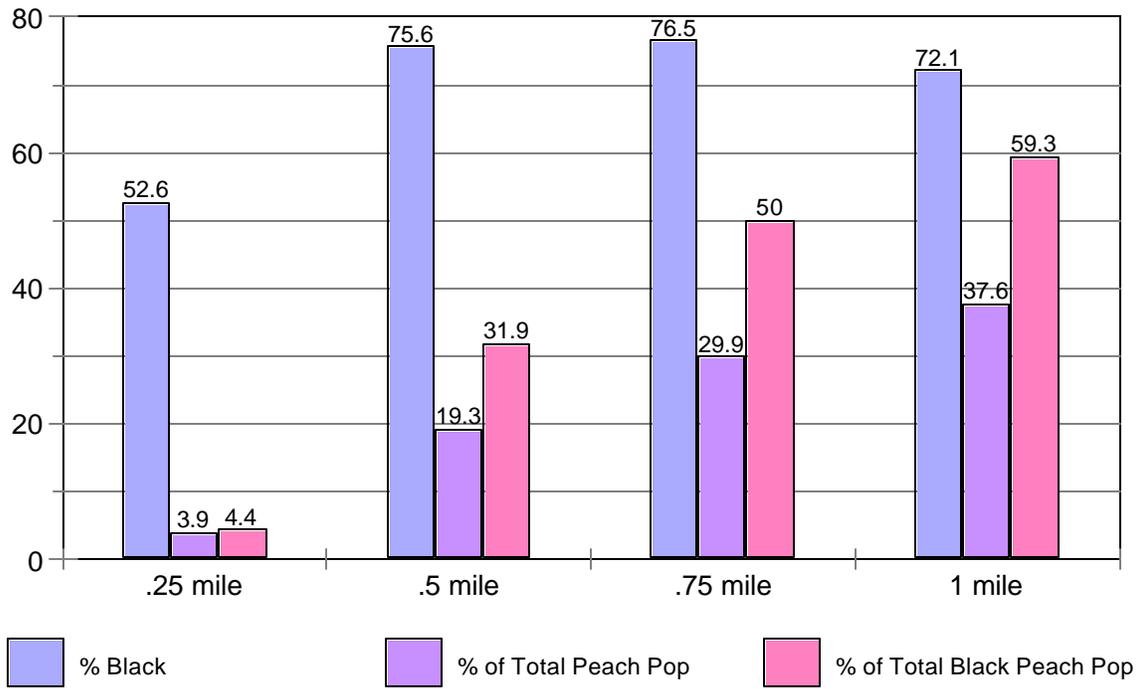
This facility appears to lie in close proximity to the PMI site discussed above. No further information is available at this time on Pyrotechnics.

Summary:

Peach County hosts a number of existing environmental contamination problems. Our analysis indicates that some of these facilities are located in predominantly minority areas and that they may pose ongoing threats to human health and safety. Moreover, historical analysis of contamination problems in Peach County strongly suggests that state enforcement of environmental laws has been insufficient to protect the public from the threat of illegal activity harmful to the environment and public health. This fact, taken by itself, is enough to cause a reasonable person to have legitimate and well grounded concerns about any new environmental health threats to people in the county such as the Aldridge landfill might provoke. It is quite clear that the best way to stop environmental contamination in Peach County is to prevent activities that might cause that sort of harm, before they go into operation.

Overall demographic profiles indicate a larger than expected minority population impacted by toxic threats in Peach County. For example, though only slightly less than 20% of the entire population of Peach County lives within 3/4's of one mile from the three facilities discussed in this report, the population that does live within 3/4's of one mile is 75.6% black. Moreover, 50% of the black population of Peach County lives within 3/4's of one mile from these three facilities. Economic statistics also indicate a higher level of poverty, lower income levels and slightly to moderately lower educational attainment in census block groups containing the Woolfolk and Blue Bird facilities respectively.

Profile of Exposed Peach County Neighborhoods



Economic Profile of Block Groups (bg) Containing Toxic Threats in Peach Cty.

