

South Carolina
**HAZARDOUS WASTE
CONTINGENCY FUND**

Annual Report

Fiscal Year 2014: July 1, 2013 — June 30, 2014



Bureau of
Land and Waste Management



South Carolina Department of Health
and Environmental Control

PURPOSE OF HWCF ANNUAL REPORT

The Hazardous Waste Contingency Fund Annual Report is submitted by the SC Department of Health and Environmental Control in compliance with S.C. Code Ann. Section 44-56-180. Additionally, Act 119 of 2005 mandates that agencies provide all reports to the General Assembly in an electronic format.

Cover Photograph:

Surface Water Treatment at the I-85 Manufacturing and Distribution Center Site—Spartanburg

Historic sampling of a small tributary to Fairforest Creek has indicated contamination with tetrachloroethylene (also known as PCE) above health based standards. The Department installed a stream air sparging system to remediate PCE discharges to surface water in 2004. The system directs stream flow into a multi-chamber concrete aeration basin where the PCE is removed by the air stripping process. Treated water is then redirected back into the stream channel. The system has operated continuously since 2004. The Uncontrolled Sites Fund was used to install the and initially operate the system. Funding to operate the system is currently provided by a settlement account funded by responsible parties.

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South Carolina Department of Health
and Environmental Control

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Introduction

The South Carolina Department of Health and Environmental Control's (DHEC or the Department) mission is to promote and protect the health of the public and the environment. The South Carolina Hazardous Waste Management Act (HWMA), S.C. Code Ann. 44-56-10 *et seq.*, supports DHEC's mission in several important ways including:

1) empowering DHEC to implement and enforce the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) and subsequent amendments;

2) establishing the Hazardous Waste Contingency Fund (HWCF) which consists of two separate and distinct sub-funds: the Permitted Site Fund, which provides funds for response actions necessary at permitted hazardous waste landfills, and the Uncontrolled Sites Fund, which provides funds for response actions necessary in the event of accidents in the transportation of hazardous materials and to defray the costs of governmental response actions at uncontrolled hazardous waste sites; and

3) establishing the Brownfields/Voluntary Cleanup Program which encourages responsible and non-responsible parties to perform response actions under DHEC's oversight. This program provides liability protection to non-responsible parties, a covenant not to sue to both responsible and non-responsible parties, and third party liability protection to non-responsible parties for undertaking and completing work pursuant to a voluntary cleanup contract entered into with the Department. Provisions for reimbursing DHEC's oversight costs are also included.

In Fiscal Year 2014 (FY14), DHEC's Division of Site Assessment, Remediation, and Revitalization continued its work to address uncontrolled or abandoned hazardous waste sites, working on approximately 313 uncontrolled waste sites with funding support from the HWCF's Uncontrolled Sites Fund. The uncontrolled sites are often referred to as "Superfund" sites. The hazardous substances present at many of these sites present a risk not only to human health and the environment, but also to the economy of the surrounding communities. DHEC works to effectively and efficiently address the challenges posed by these sites.

In FY14, DHEC's Division of Waste Management, with funding support from the Permitted Site Fund, continued to work on the preservation of hazardous waste manifests associated with the former commercial hazardous waste landfill located in Sumter County and known as the Pinewood facility (Pinewood). Funding from the Permitted Site Fund also supported staff with responsibility for technical oversight, inspection, and compliance monitoring activities at the Pinewood facility.

This report, which is mandated by the HWMA, S.C. Code Ann. Section 44-56-180 (b), provides information on the activities and response actions carried out in FY14 under the auspices of the HWCF.

G. Kendall Taylor, P.G., Division Director
Division of Site Assessment, Remediation & Revitalization

David Scaturo, P.E., P.G., Division Director
Division of Waste Management

FY14 Accomplishments at a Glance

HWCF Uncontrolled Sites Fund

The HWCF Uncontrolled Sites Fund supported activities at approximately 313 sites across the state during FY14. These activities included sampling and analysis, remedial actions, technical reviews and oversight, project management, public participation and outreach, potentially responsible party (PRP) searches, cost recovery activities, negotiation of voluntary cleanup contracts and other settlements, and many other activities to support the investigation and cleanup of contaminated sites. Site-specific expenses ranged from less than one hundred dollars in personnel costs to hundreds of thousands of dollars in contractor costs for sampling and cleanup activities. A few of this year's highlights are described below.

- **BC Components (a/k/a Philips Components) Site.**

This Irmo site is the location of a former electronic capacitor manufacturing operation. Following closure of the facility, the property was purchased as a Brownfields property and is being redeveloped as a public park. Lorrick Branch separates the property from a residential area and closely follows the western property boundary before flowing into the Saluda River. In FY13, DHEC conducted multiple sampling events which identified high levels of polychlorinated biphenyl (PCB) contamination in surface and near-surface soils within the footprint of the former main manufacturing building and within an onsite ditch. Based on these results, DHEC conducted a time-critical removal action in FY14 to protect public health and the environment. Because the responsible parties were unwilling to conduct the removal action, DHEC used its authority under the HWMA to conduct the removal action using a state contractor and the Uncontrolled Sites Fund. Through FY14, DHEC had incurred approximately \$600,000.00 in response costs and is pursuing recovery of its response costs from the responsible parties.

- **F.S. Royster Guano Site.** F.S. Royster Guano was a fertilizer manufacturer in Columbia in the early 1900s, prior to environmental regulations. The fertilizer manufacturing process resulted in waste material with high levels of arsenic and lead. In May 2012, arsenic was found in soil and groundwater on part of the former Royster property that now includes a mix of residential and commercial properties. DHEC collected numerous samples and based on the results, requested United States Environmental Protection Agency (EPA) involvement and assistance. In FY13, the EPA conducted additional sampling and eventually removed contaminated soil from 12 residential properties where the highest levels of arsenic and lead were found. In FY14, DHEC implemented a limited removal of contaminated surface soils to pre-

vent potential exposure and migration into residential areas. DHEC and a state contractor also developed and began implementation of a comprehensive work plan for sampling potentially impacted commercial properties.

- **Philip Services Corporation (PSC) Site.** In FY14, DHEC staff reviewed the Pre-Design Investigation (PDI) Work Plan prepared by the PSC Potentially Responsible Party Group. The goal of the PDI is to provide additional technical information to assist in the design of the final cleanup remedy. The PDI is expected to be implemented in mid-FY15. DHEC also drafted a Proposed Plan for Remedial Action which identifies DHEC's preferred cleanup remedy. In early FY15, notice of the Proposed Plan and an August 2014 public meeting was sent to the public, responsible parties, local government officials, and other interested parties. DHEC will use the August 2014 public meeting to discuss the preferred remedy and to seek public input. Late in FY14, DHEC prepared letters to notify approximately 1700 additional parties of the potential liability for cleanup costs. Settlement negotiations with the PSC PRP Group, which represents over 1100 parties, continued throughout the year.
- **Langley Pond Site.** Langley Pond is a 280-acre impoundment that received large quantities of wastewater from textile mills and other sources beginning in the mid-1800s. Langley Pond is an important economic and recreational resource where historic sediment contamination has led to fish consumption advisories. In FY12 and FY13, DHEC collected hundreds of samples and, in consultation with the EPA, completed an evaluation of potential risks for human exposure. In FY14, DHEC held a public meeting and presented the results of the study, which indicated the water in Langley Pond was safe for recreational use. This effort was conducted in partnership with Aiken County.
- **Responsible Party Voluntary Cleanup Contracts (RP-VCCs) and Consent Agreements/Orders.** During FY14, DHEC invited responsible parties for 31 sites into the VCP and actively negotiated VCCs or VCC amendments on 39 sites. Twelve RP VCCs and amendments were executed during FY14. Also, DHEC staff reviewed technical documents and provided technical assistance/oversight on approximately 245 sites being addressed by responsible parties under VCCs or consent agreements/orders.
- **EPA Removal Sites.** DHEC provided support to the EPA for several sites where EPA's Emergency Response and Removal Branch either conducted a time-critical removal action or evaluated a site for eligibility for an EPA-lead removal action.

History and Status of HWCF's Uncontrolled Sites Fund

The HWCF was established in the 1980s to ensure the availability of funds for response actions at uncontrolled sites that do not qualify for federal assistance. The HWCF was initially financed through the imposition of fees on waste disposed at the Pinewood Hazardous Waste Landfill (Pinewood). From its beginning in the 1980s, the Uncontrolled Sites Fund portion of the HWCF grew to a balance of approximately \$11 million at the close of FY90.

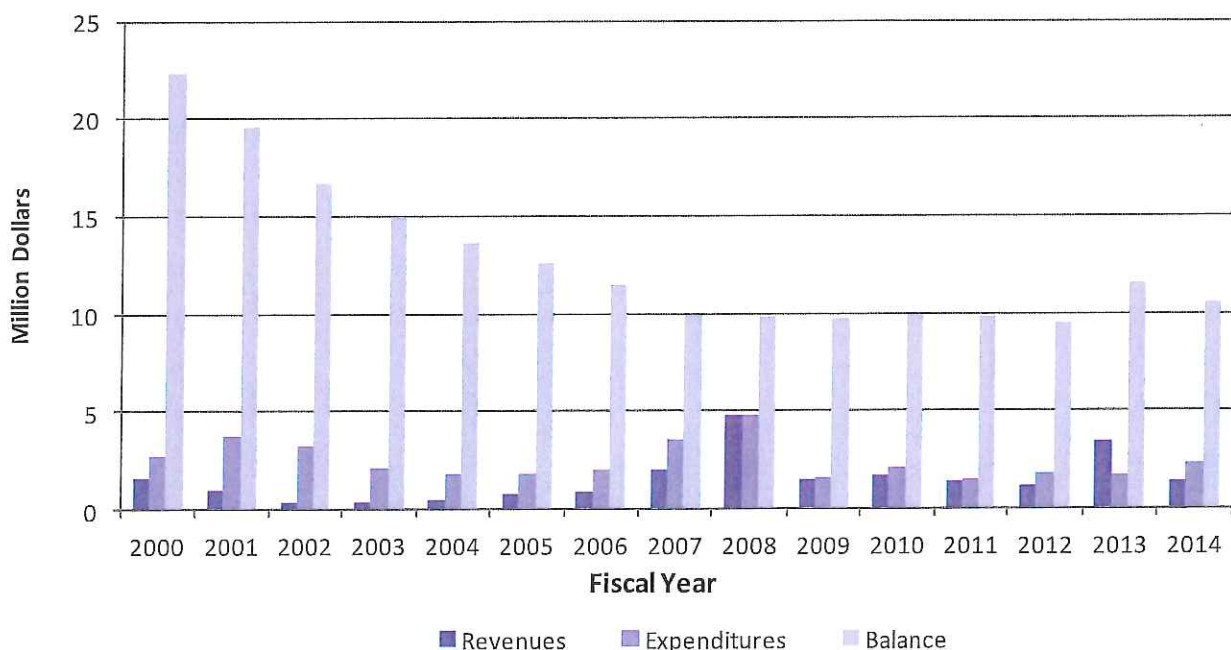
Through the 1990s, revenues for the Uncontrolled Sites Fund averaged approximately \$2 to \$3 million annually and the balance grew and briefly exceeded \$25 million in 1998. However, the HWCF lost its primary funding source in 2000 when Safety-Kleen filed for bankruptcy protection and shortly thereafter stopped receiving waste at Pinewood. At that time, the Uncontrolled Sites Fund had a balance of approximately \$22 million (see figure below). With the exception of monies from cost recovery efforts and the billing of private parties for DHEC's oversight of work performed under consent agreements and voluntary cleanup contracts, there were no new revenues for the Uncontrolled Sites Fund. From FY99 through FY07, expenditures greatly exceeded revenues and the Uncontrolled Sites Fund balance steadily declined.

Beginning in 2000, establishing a continuing funding source for the HWCF was a budget priority for the De-

partment. Budget Proviso 9.45, which was passed in 2006, allowed the HWCF's to retain the interest on the Fund's balance. In FY08, Budget Proviso 9.54 authorized DHEC to assess an annual fee on hazardous waste generators and to levy a per ton fee on hazardous waste generated with the proceeds to be deposited into the HWCF. These provisos were codified in 2008. Specifically, large quantity generators, as determined by R.61-79.262 (South Carolina Hazardous Waste Regulations), producing greater than 100 tons of hazardous waste per year are assessed an annual base fee of \$1,000 per facility and a \$1.50 per ton fee for all hazardous waste the company generates. Small quantity generators are assessed an annual fee of \$500. Fees collected shall not exceed an annual cap of \$15,000 per generator. Companies subject to fees required by S.C. Code Ann. Section 44-56-170(F)(1)(1976) are exempt from these fees. Annually, the interest and fees provide approximately \$1 to \$2 million in new revenues.

The opening balance for FY14 was \$11,514,473.86. During FY14, revenues were \$1,354,730.05 and expenditures were \$2,307,735. The revenues included over \$1.1 million in generator fees and interest earnings. The Uncontrolled Sites Fund closed FY14 with a balance of \$10,561,468.91, much of which is committed to future assessment and remediation activities at existing sites.

HWCF Uncontrolled Sites Fund



HWCF Uncontrolled Sites Fund Financial Snapshot for FY14

Opening Balance (07/01/13)	11,514,473.86
Revenues*	1,354,730.05
Total Expenditures FY14 <i>(See Table below)</i>	2,307,735.00
Closing Balance (06/30/14)	10,561,468.91
Obligated as State Cost Share Match for National Priorities List (NPL) Sites**	486,690.00
Obligated for Site Response Activities <i>(See Table on page 5)</i>	2,088,770.00
Obligated for Supplies, Equipment, Travel, Etc.	50,000.00
Obligated for Administrative Expenses (Salaries, Fringe Benefits & Agency Assessment)	1,350,080.00
Un-obligated Balance for Uncontrolled Sites Fund (06/30/14) ***	6,585,928.91

* Includes hazardous waste generator fees, interest, reimbursement of oversight costs, and cost recovery.

** At federal fund-lead NPL sites, CERCLA requires the state to provide a 10% cost share for remedial actions. This figure is for the outstanding portion of DHEC's 10% cost share for the Brewer Gold Mine Site—Operable Unit 1 (\$440,600) and the Geiger Site (\$46,090). The Brewer Gold Mine Site estimate includes DHEC's estimated 10% cost share for construction of a new treatment system and one year of current costs of operation and maintenance (O&M) costs for the existing treatment system. In approximately five to seven years, DHEC will be responsible for 100% of annual O&M costs estimated at over \$800,000/year. In the next few years, a state match will be required for the Cone Mills Site, and a substantial cost share is also anticipated for the Barite Hill Mine Site.

*** This figure does not account for upcoming assessment/cleanup activities that are in the planning stages and which have not yet been assigned to a contractor.

Breakdown of Total FY14 Expenditures

Uncontrolled Sites*	1,062,347.41
Emergency Response	9,892.43
Salaries, Fringe Benefits, Agency Administrative Assessment	1,235,495.16
Total Expenditures	2,307,735.00

* Does not include approximately \$326,000 in contractual money spent from site-specific settlement accounts.

FY15 Obligations for Uncontrolled Sites Fund

This table shows site-specific obligations (approximately \$2 million) that were already assigned to a state contractor or which were planned to be committed. These sites represent a very small portion of DHEC's inventory of sites. Based on recent and historical averages, it is estimated that the existing inventory of sites will present a liability to the Uncontrolled Sites Fund in the tens of millions of dollars or more.

Obligation	Description	Amount
Bamberg Hwy 301	Private Well Sampling and Assessment Activities	10,500.00
Can City Road	Removal Action	50,000.00
C.E. Taylor	Maintenance of Well Filters	9,680.00
Cone Mills/US Finishing	Annual Operation and Maintenance and Receiver Activities	10,000.00
Elmore Waste Disposal (NPL Site)	Groundwater Remediation System, Operation and Maintenance, and Groundwater and Surface Water Sampling	163,000.00
F.S. Royster Guano	Completion of Pre-removal Sampling/Assessment	197,384.00
F.S. Royster Guano	Soil Removal Action	1,000,000.00
Healthtex	Assessment/Well Sampling	55,950.00
Palmetto Wood Preserving (NPL Site)	Annual Operation and Maintenance, Sampling	14,028.00
Philip Services Corporation	Remedy Selection, Groundwater Treatment Operation and Maintenance, Legal	200,000.00
Stoller Chemical	Petromat Area Investigation	85,600.00
Suffolk Chemical	Groundwater Remediation Operation & Maintenance	52,966.00
Waste Haulers	PCB Investigation	25,000.00
Weylchem	Well Sampling	14,662.00
Whetsell Farm	Removal Action	100,000.00
Miscellaneous	Outside Legal Services to Support Cost Recovery, etc.	100,000.00
Total Obligations as of June 30, 2014		2,088,770.00

Note—This figure does not include several upcoming assessment/cleanup activities that are in the planning stages and which have not yet been assigned to a contractor. It also does not include State-lead activities funded by court-ordered site-specific cleanup funds established through cost recovery activities.

Primary Uses of the HWCF Uncontrolled Sites Fund

State-lead Response Actions. The primary uses of the Uncontrolled Sites Fund are to provide funds for contractual services to perform state-funded investigation and cleanup activities at sites where other funds are not available, and to provide funds for personnel and operating costs to implement the program for conducting response actions. The State Superfund Program evaluates and sets priorities for sites in order to address the worst cases first. Unless the Department deems an imminent threat exists or a criminal investigation is necessary, state-funded response actions are generally conducted only after the Department initiates the appropriate procedures to secure alternative funding. Considerable time and effort are expended to ensure that all available funds from the responsible parties and other sources are utilized before drawing on funds from the Uncontrolled Sites Fund.

In most cases, the Department attempts to negotiate voluntary cleanup contracts or other settlements with responsible and non-responsible parties. Various styles of settlements with responsible and non-responsible parties require settling parties to perform investigations to determine the source, nature, and extent of contamination and/or cleanup contaminated sites, to fund these response activities themselves, or, alternatively, to reimburse the Department's response costs when the Department performs cleanups of sites. With many of these settlements, the Department typically includes covenants not to sue for the work performed by the responsible or non-responsible parties to the Department's satisfaction, and/or state contribution protection from other responsible parties which may seek reimbursement of all or a portion of costs of responding to environmental conditions at a site.

When a responsible or non-responsible party enters into an agreement or voluntary cleanup contract with the Department to pay for or perform response activities, DHEC staff must review and approve all environmental reports, sampling data, and other activities associated with the cleanup

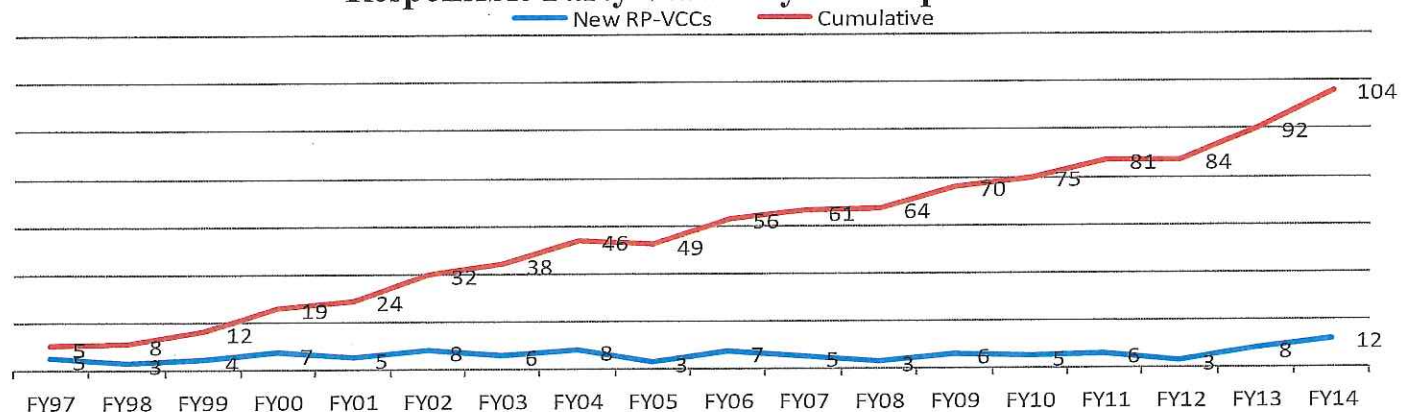
of contaminated sites to assure that public health and the environment are protected. Under these contracts and agreements, parties are required to reimburse DHEC's costs for oversight activities. The authority of DHEC to use the Uncontrolled Sites Fund and to seek cost recovery provides leverage that may encourage responsible parties to come forward voluntarily. Further, DHEC performs public participation/community involvement activities pursuant to CERCLA and the National Contingency Plan (NCP) to ensure that affected communities have input into the cleanup.

The chart below shows the number of responsible party voluntary cleanup contracts (RP-VCCs) executed and the cumulative total for each fiscal year since the first RP-VCC was executed in FY97. One administrative settlement and 12 new RP-VCCs were executed in FY14. Approximately 39 VCCs were under negotiation.

Emergency Response. DHEC's Emergency Response Program responds to accidental spills and other problems associated with the transportation of hazardous materials as well as other incidents where hazardous materials are spilled, illegally dumped, or otherwise abandoned on public property. The Emergency Response Program administers the Emergency Response Contract, which is used to secure, sample, and properly dispose of wastes. These activities are funded by the Uncontrolled Sites Fund.

In FY14, the Emergency Response Program expended \$9,892.43 responding to four emergency response incidents. The Emergency Response Program generally seeks reimbursement from the National Pollution Funds Center and/or the responsible parties. In FY14, \$5,199.20 was recovered. The amount of reimbursement money varies from year to year depending on the number and types of incidents that occur. All reimbursements are returned to the Uncontrolled Sites Fund.

Responsible Party Voluntary Cleanup Contracts



Primary Uses of Uncontrolled Sites Fund (Continued)

Administrative Costs/Salaries. DHEC uses Uncontrolled Sites Fund monies for salaries and program administration. The Uncontrolled Sites Fund currently funds approximately 19 FTEs (full-time equivalent positions) that perform site prioritization activities, project management, technical reviews and field oversight, cost recovery activities, public participation activities, and other administrative activities. During FY14, the Uncontrolled Sites Fund provided approximately \$1,235,000 for salaries, fringe benefits, agency administrative assessments, and other operating costs. These costs are included in DHEC's cost recovery efforts against PRPs.

Criminal Investigations. The State Superfund Program also assists DHEC's Office of Criminal Investigations by providing technical assistance and contractual services for gathering evidence for environmental crime cases. After the initial criminal investigation activities are completed, DHEC may perform or oversee additional cleanup activities. These matters are considered enforcement confidential until the criminal investigations are completed.

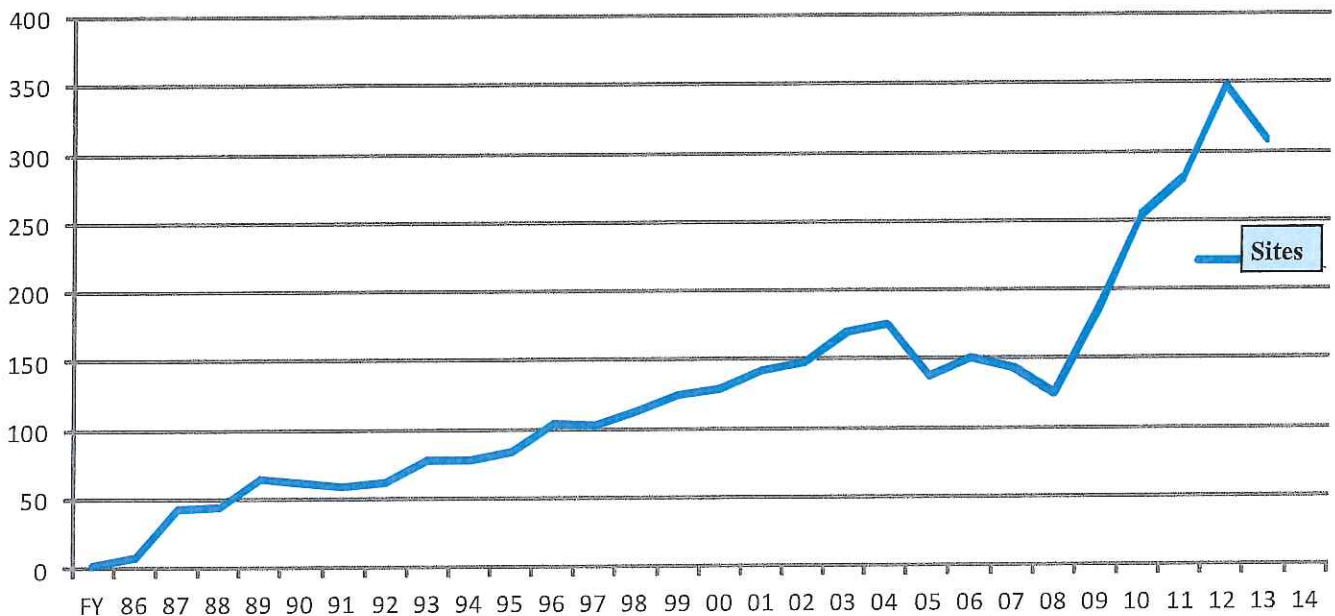
Federal-lead Superfund Sites. In FY14, the Uncontrolled Sites Fund supported certain DHEC activities at five federal-lead Superfund sites. Cleanup activities on most of these sites are being funded by private parties and most of DHEC's day to day costs are funded through the Support Agency Cooperative Agreement

with EPA. However, DHEC may also incur costs for activities such as natural resource damages assessments, support to EPA's Emergency Response and Removal Branch, and other activities that are outside the scope of the cooperative agreement. For federal-financed remedial actions at NPL sites, the State is liable for a state cost share of at least 10% up to 50% for long-term remedial action costs and 100% of operation and maintenance (O&M) costs. The state cost share is normally funded by the Uncontrolled Sites Fund.

In November 2009, DHEC assumed responsibility for 100% of the O&M costs for the existing groundwater pump and treat system at the Elmore Waste Disposal Site in Greer. For FY15, DHEC's costs are expected to be approximately \$163,000. DHEC has also assumed responsibility for O&M costs at the Palmetto Wood Preserving Site. Annual O&M costs for this site are approximately \$15,000 per year. DHEC also has an outstanding cost share of \$46,900 for the Geiger Site. Two other sites are expected to require more substantial cost shares in the next several years.

Currently, the Brewer Gold Mine is the NPL site with the most potential to have a major impact on the Uncontrolled Sites Fund. In FY14, EPA and DHEC agreed on a remedy that could result in DHEC incurring estimated O&M costs of \$75,000 for five to seven years, followed by annual costs of greater than \$800,000 for at least the next 15 years.

Number of Sites Addressed/Supported by the Uncontrolled Sites Fund by Fiscal Year



State Superfund Program's Response Process

The purpose of the State Superfund Program is:

To protect public health and the environment by requiring investigation and cleanup of abandoned and uncontrolled hazardous waste sites and by taking short-term actions to mitigate immediate threats to human health and the environment.

DHEC focuses its attention and financial resources on the sites that pose the greatest risk to human health and the environment. DHEC's Bureau of Land and Waste Management's Division of Site Assessment, Remediation, and Revitalization is responsible for managing state-lead response actions and supporting federal-lead response actions. The State Superfund process begins with site discovery or notification of possible releases of hazardous substances.

DHEC's site assessment and remediation process may include a short-term removal action or a complex and lengthy remedial investigation and long-term cleanup.

Removal Process. If a site requires immediate attention, DHEC may perform an emergency response action or a time-critical removal to address immediate threats to the public health or the environment.

Remedial Process. If a site does not pose an imminent threat, it is evaluated to determine whether it warrants

further remedial (or long-term) measures. If a site does not qualify for placement on EPA's National Priorities List (NPL), then cleanup is addressed by the State Superfund Program.

- **RI/FS Phase.** A Remedial Investigation (RI) is an in-depth investigation to determine the source, nature, and extent of contamination at a site. The Feasibility Study (FS) provides a comparison of various cleanup options that would make the site safe for the public and the environment.
- **Proposed Plan Phase.** From the information in the FS, a Proposed Plan is developed offering a preferred remedial option. The public is given a 30-day comment period during which a public meeting is held to encourage community input and participation in the final remedy selection.
- **ROD Phase.** After the comment period, DHEC formally documents the selected remedy in the Record of Decision (ROD).
- **RD/RA Phase.** After the ROD, the project enters the Remedial Design/Remedial Action (RD/RA) phase where the remedy is designed and implemented. Ongoing monitoring occurs to ensure that the remedy remains protective of public health and the environment.
- **Closure.** The point when DHEC determines the cleanup is complete and no additional response action is required.

State Superfund Program's Community Involvement

The State Superfund Program strives to inform the public of environmental impacts of contamination in their communities and to involve local communities in decision-making opportunities. Depending on specific needs of the community and state and federal law, DHEC:

- Provides fact sheets specifically written for local communities;
- Holds community meetings and availability sessions specific to site needs and various phases of response;
- Provides notice in a local newspaper of 30-day periods to comment on proposed cleanup activities and availability of the administrative record (which contains decision-making documents and which is made available at a local library and at DHEC's Bureau of Land and Waste Management office);
- Provides notice of 30-day periods to comment on pro-

posed settlements with responsible parties and publishes such notice in a local newspaper and/or the South Carolina *State Register*;

- Establishes a community relations plan for state-lead sites as deemed appropriate;
- Participates or assists in media releases; and,
- Provides environmental reports, proposed contracts, public meetings and other information on DHEC's webpage for the public:

www.scdhec.gov

Community Involvement in FY14

• Community Meetings	4
• Newspaper Notices	14
• Public Comment Periods	11

History and Status of HWCF's Permitted Site Fund

The HWCF Permitted Site Fund was established pursuant to Section 44-56-160(B)(1) of the HWMA to ensure the availability of funds for response actions arising from the operation of permitted land disposal facilities in South Carolina. At the time the Permitted Site Fund was established, the only permitted hazardous waste land disposal facility in South Carolina was the Pinewood Landfill (Pinewood) located in Sumter County. The Permitted Site Fund was funded by a portion of the fees imposed on generators who sent their hazardous and non-hazardous wastes for disposal at the Pinewood facility. After Pinewood closed, no new revenue source to replace the generator fees was identified for the Permitted Site Fund. Post-closure revenues are from interest earned on the existing Permitted Site Fund.

The Permitted Site Fund may be used for response actions arising from the operation of the Pinewood facility. The HWMA defines a "response action" as "any cleanup, containment, inspection, or closure of a site ordered by the director as necessary to remedy actual or potential damages to public health, the public welfare, or the environment." Subsequent to the creation of the Permitted Site Fund, the General Assembly approved a proviso that authorizes DHEC to expend funds from the Permitted Site Fund for legal services related to environmental response, regulatory, and enforcement matters, including administrative proceedings and actions in state and federal courts.

DHEC has utilized funds from the Permitted Site Fund for the preservation of information contained on manifests of wastes disposed at the Pinewood facility. There are thousands of manifests documenting waste disposed at Pinewood, including the origin, type, volume, and description of wastes. The manifest preservation project includes scanning and auditing of the manifests, database creation and data entry, and quality assurance/quality control. These manifests provide critical information about historical waste disposal practices at the Pinewood facility. In addition, the Permitted Site Fund provides partial support for staff who perform technical, enforcement, and compliance activities at the Pinewood facility.

HWCF Permitted Site Fund Financial Snapshot (FY09 through FY14)

FY	Revenues (Interest)	Expenditures	End Balance
FY09	\$755,243	\$0	\$19,215,303
FY10	\$701,676	\$0	\$19,916,979
FY11	\$536,795	\$0	\$20,453,774
FY12	\$426,479	\$14,138	\$20,880,253
FY13	\$389,855	\$113,978	\$21,270,108
FY14	\$287,993	\$335,359	\$21,558,101

