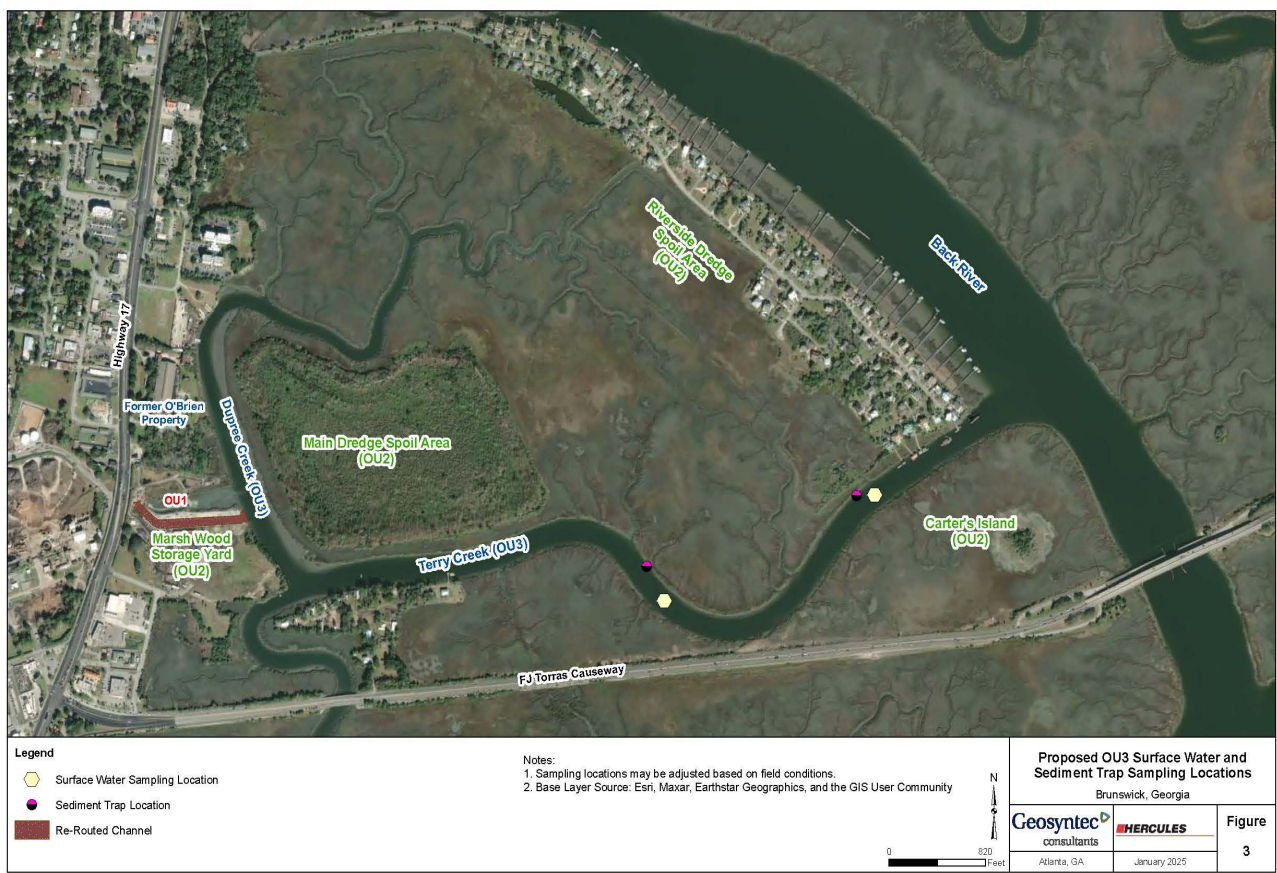


Draft Annotated Site Chronology – Terry Creek Superfund Site, GA
SCA Associates April 3, 2026

1. Sediment Dredging and Dredge Spoils Placement

- 1938 Rivers and Harbors Act designated 10 ft deep 80 ft wide, 1.4 mi long navigation channel (later lengthened to 1.7 mi)
- 1939 Dredging completed; Hercules used creek to import wood stumps
- 1940-1946 Initial phase of maintenance dredging: conducted in 1940, 1941, 1942 and 1946
- 1940s-1950 Dredge spoils deposited at “Tract 2” adjacent to Torras Causeway (reported as being “beside Terry Creek” or “between Sea Island and St. Simon’s Island” in two versions of USACE site summary. USACE not certain how much material was deposited in this area.
- Geosyntech refers to an old disposal area of about seven acres as “adjacent to and north of Torras Causeway beside Terry Creek” which is currently known as the Trailer Park Dredge Spoil Area. Reportedly this area was filled before toxaphene was first produced in 1948.
- 1948-1972 Hercules produced toxaphene and discharged untreated wastewater into creek; USACE reports that in 1966, 250 to 300 lbs of toxaphene per day were discharged into creek. USACE reports creek was “virtually sterile” and barnacles would be cleared from hulls of boats after being moored in the creek for one or two days.
- Geosyntech reports that “prior to 1972 some Terry Creek dredge spoils were disposed at Carter’s Island” which is 3.5 acres south of Terry Creek and 400 ft north of Torras Causeway.
- 1972 Governor Carter asks for stop to dredge spoils disposal in areas along Torras Causeway (apparently dredging was suspended as parties searched for new disposal site). At some point later according to USACE, City of Brunswick and Hercules worked together to acquire easements for new dredge spoils disposal site (USACE reported that Hercules “is part owner in at least one tract of the disposal area” which is the “Main Dredge Disposal Area” as designated by EPA. The Main Dredge Spoil Area is about 72 acres.)
- 1972 Hercules installs plant to treat toxaphene wastewater before discharge

- 1972 USACE records indicate Hercules spilled toxaphene into creek; USACE employees recounted “drums spilled” from transport barge into creek (location and other details not documented)
- 1972-1989 Second phase of maintenance dredging: conducted in 1972, 1978, 1983, 1987, 1988 and 1989. Geosyntec reports that the “Main Dredge Spoil Area” was the primary disposal area from 1972 until dredging stopped in 1989, but some spoils were disposed at the Riverside Dredge Spoil Area (about 48 acres in total but reportedly only about 11 acres in the southernmost part of the site nearest Terry Creek were filled with dredged materials).



1973 USACE sponsored study by Reimold and Durant reported impacts in *Toxaphene Content of Estuarine Fauna and Flora Before, During and After Dredging Toxaphene Contaminated Sediments*.

1980s-1990s USACE reports that internal documents refer to formal agreement between Georgia, USACE and Hercules designating “Terry Creek Disposal Area” as the sole

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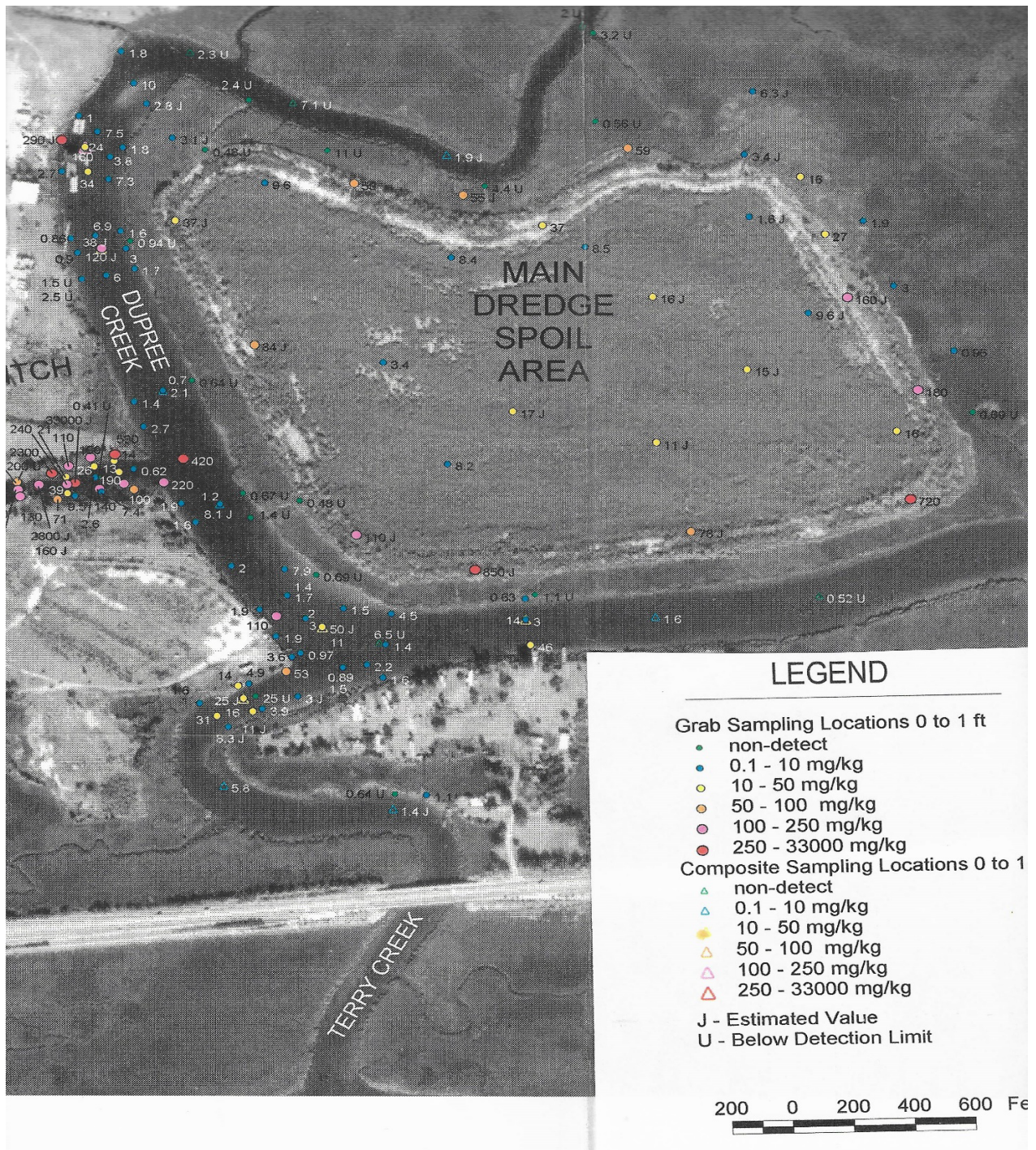
*OU2/OU3 Site Chronology
April 3, 2026*

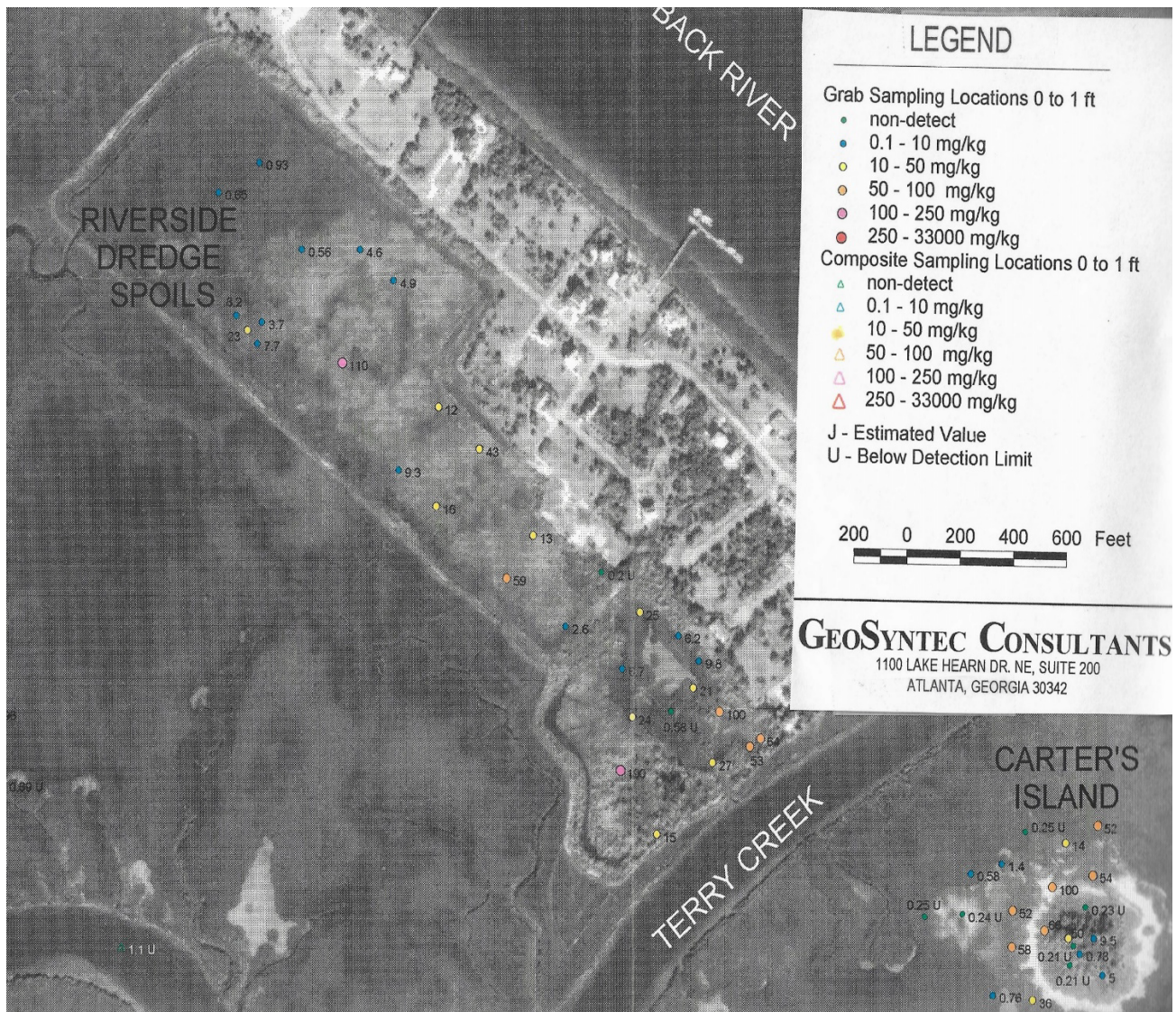
acceptable disposal site for Terry Creek dredge materials (supposed formal agreement not found in USACE files).

- 1986 USACE contracts Savannah Labs to collect and analyze “soil samples from the disposal area.” USACE reports it took measures during 1988-1989 dredging to protect workers and “provide medical surveillance for toxaphene.”
- 1989 USACE reports Hercules determined it no longer needed dredging of Terry Creek (USACE retains its disposal easements in perpetuity).
- 1998-2000 Hercules conducts dredging of the Outfall Ditch and some areas of Terry and Dupree creeks

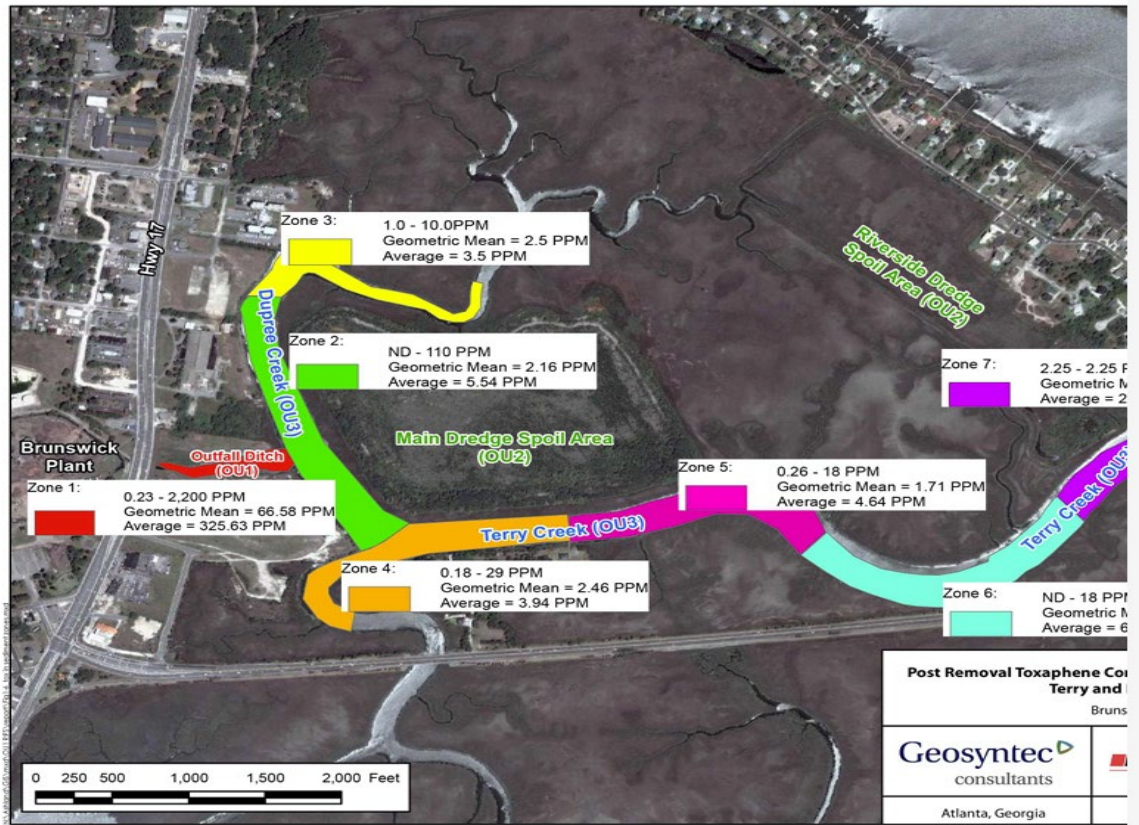
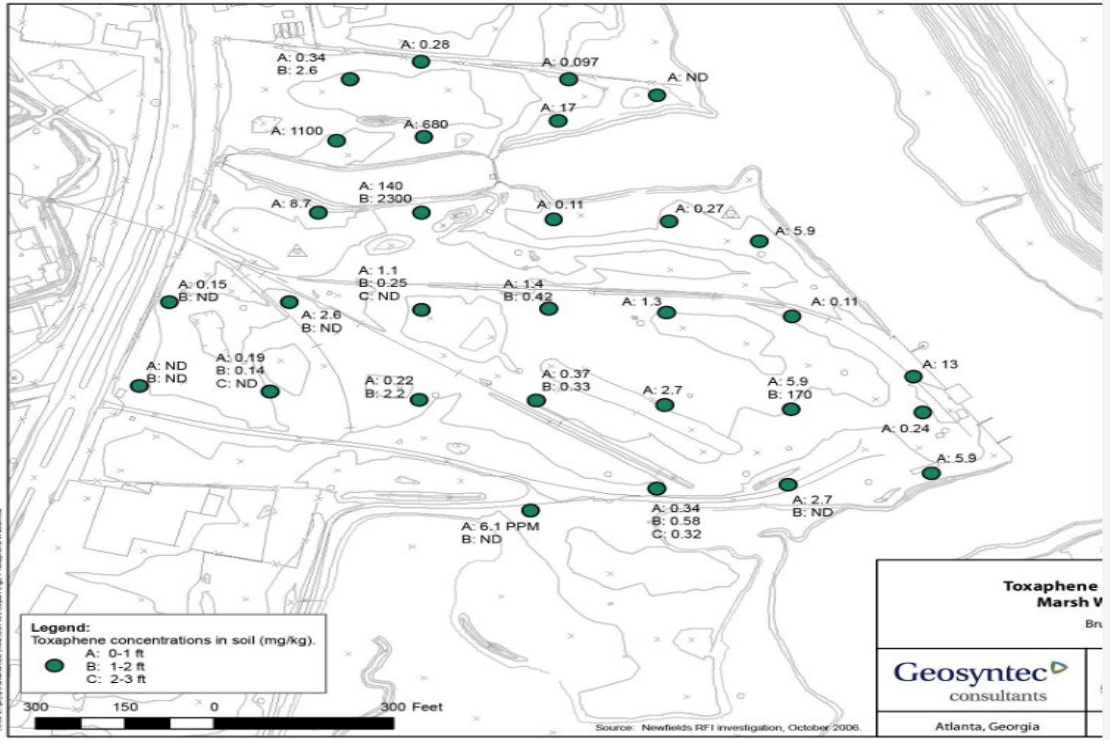
2. Site Investigations

- 1994 National Oceanographic and Atmospheric Administration (NOAA) sediment samples from Terry Creek and the Back River; Acute toxicity for marine amphipod *Ampelisca abdita*.
- 1995 EPA Expanded Site Inspection (ESI); 45 groundwater, surface water, soil, and sediment samples collected from Terry and Dupree creeks, Back River, and dredge spoil areas. Toxaphene in soil and sediment up to 430 parts per million (ppm).
- 1996 Killifish sampled from Terry and Dupree creeks; toxaphene about 19 ppm to 27 ppm.
- 1997 EPA Ecological Screening Evaluation (ESE) for the vicinity of Terry and Dupree Creeks; sediment, surface water, fish and shellfish. No toxaphene in any fish or shellfish samples, but up to 230 ppm in sediment.
- 1997 Hercules Site Status Investigation (SSI) Nov 1997-Jul 1998. 375 soil, sediment and groundwater samples. Toxaphene in sediments in the Outfall Ditch generally greater than 100 ppm to 8.5 ft depth. Surficial sediments in Dupree Creek generally less than 10 ppm; in Terry Creek sediments 20-50 ppm near the confluence with Dupree Creek, but generally less than 10 ppm elsewhere. Toxaphene dredge spoil areas 10-50 ppm, a few greater than 100 ppm. No toxaphene in groundwater.
- 1998 Geosyntech Dec 4 1998 “Close-out Report” presents data from 1997 creeks and dredge spoils areas sampling; toxaphene levels in top one foot of sediments and dredge spoil areas soil depicted in following two figures from that report.





- 2006 Resource Conservation and Recovery Act (RCRA) Facility Investigation of soil across Wood Storage Yard: Toxaphene highest north and south of the ditch along pre-weir section.
- 2014 Geosyntech Dec 15 Focused OU1 RI/FS report presented a variety of information and data from previous studies and focused on identifying alternatives for cleanup of the Outfall Ditch (identified as a major continuing source of releases to the estuary. The following two figures from that report show toxaphene levels found in soil at the Wood Storage Yard (Fig. 1-3), and statistical analysis of toxaphene in creek sediment data after the 1999 removal efforts (Fig. 1-6).

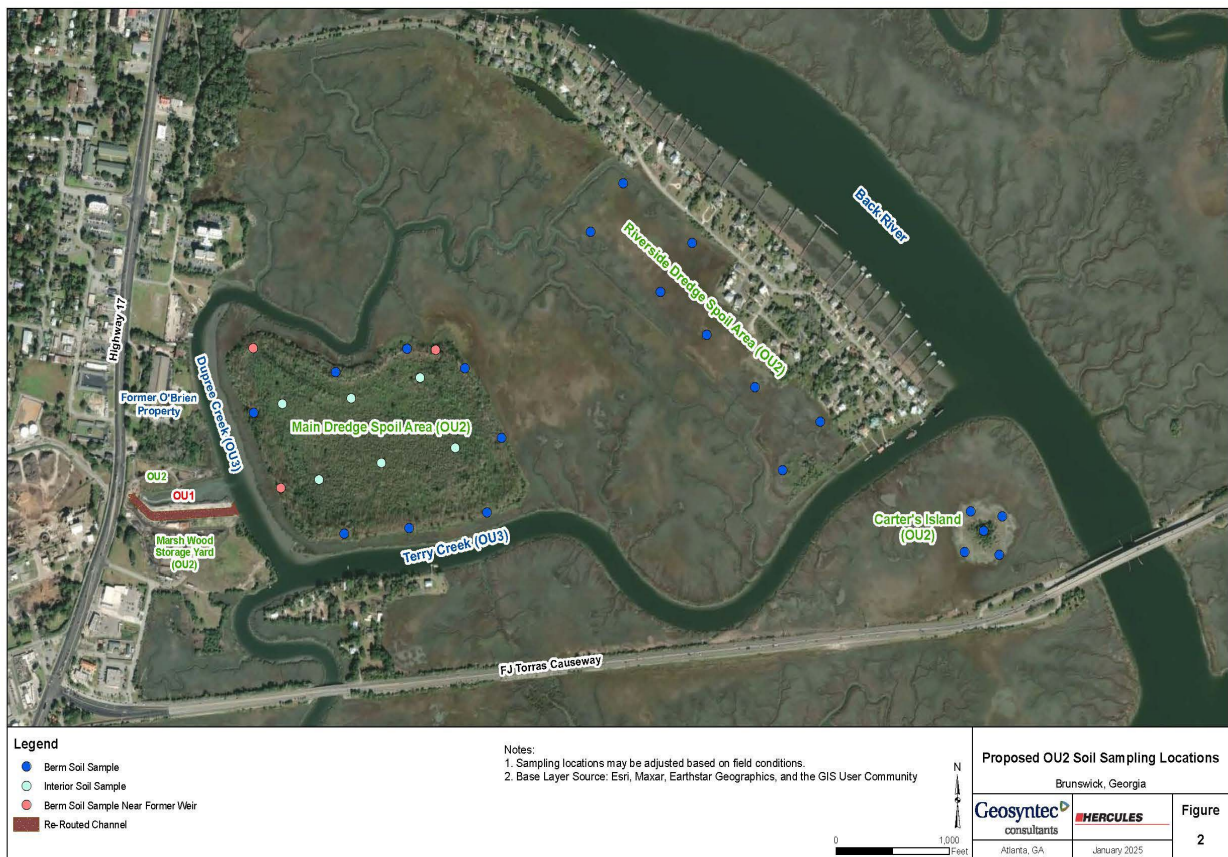


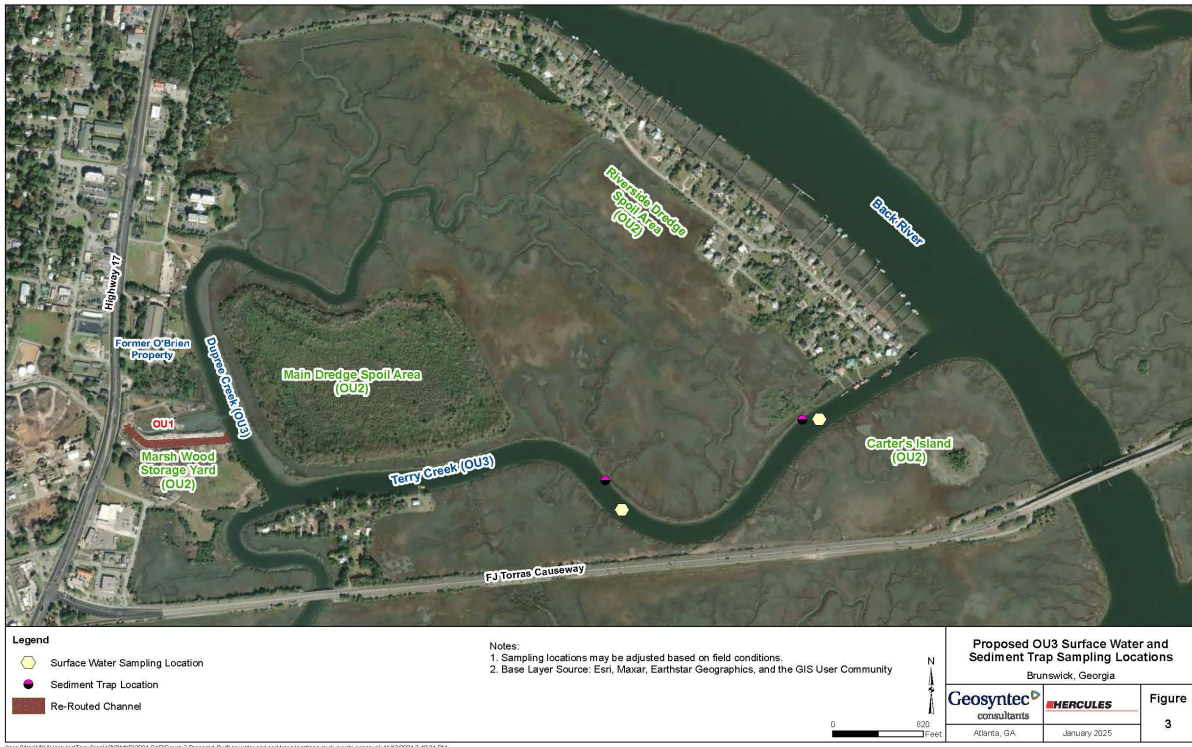
Terry Creek Superfund Site, GA
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OU2/OU3 Site Chronology
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2022 Marsh Wood Storage Yard soil sampled to determine toxaphene levels around old ditch area. Four iterative phases of sampling conducted from Aug 2022 through Oct 2024 identified areas of toxaphene above risk-based maximum allowable concentration of 210 ppm. About 1,581 cy soil removed as outfall ditch was replaced (see Section 3. Removals below)

2025 OU2/OU3 Scoping Study: Creek sediment, surface water and dredge spoil areas soil samples collected in summer accordance with Geosyntec Jan 2025 sampling and analysis plan (see following figures). No report of results as of Apr 3 2026.





2026 As of April 3, no report on results of recent “southern parcel” soil sampling available (figure below shows that area according to USEPA email of Sep 16, 2025).



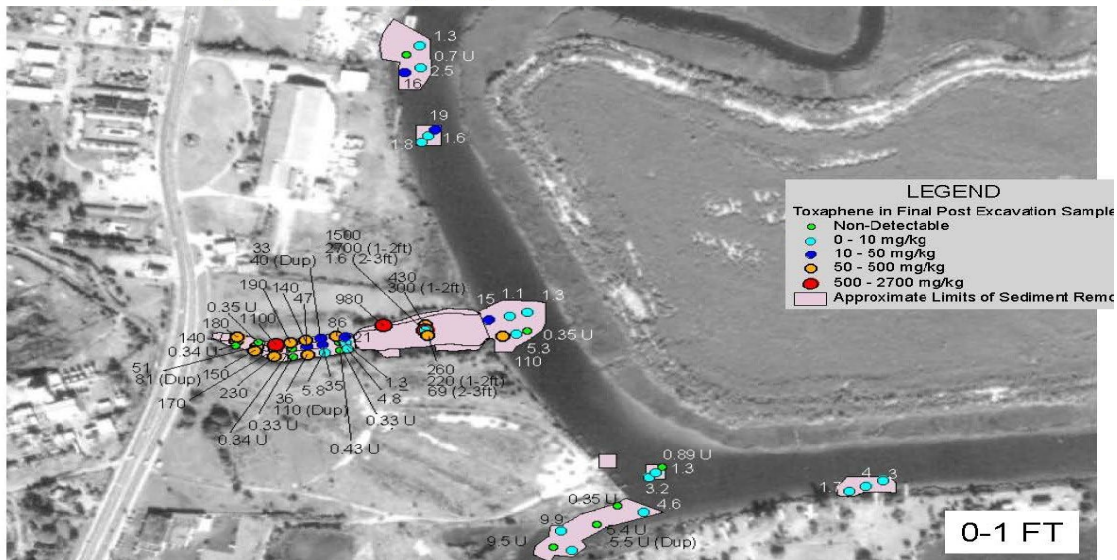
2026 Creek sediment and water sampling done before, during, and after Outfall Ditch project was completed should be reported “soon” according to Geosyntech (being considered as part of Outfall Ditch remediation long-term monitoring)

3. Removal Actions to Date

1999 Hercules removed contaminated sediments from above weir through Outfall Ditch to confluence of Terry and Dupree Creeks, and north Dupree Creek. About 16,800 cy sediment removed from ditch; 10,000 cy from the mouth of the ditch. Post-removal sediment had toxaphene up to 2,200 ppm in the 0-2 ft sediment depth interval.



Toxaphene in Post-Excavation Tidal Creek Sediment



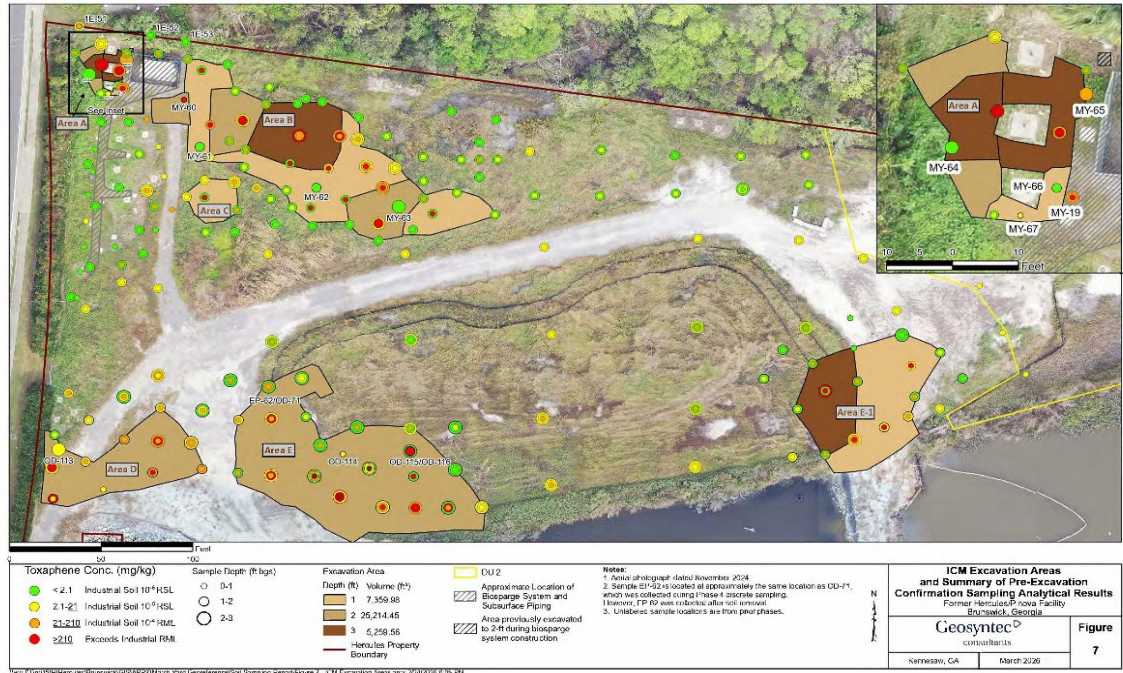
Geosyntec

2022 Removal of the old Outfall Ditch and construction of a new ditch began in October and continued through July 2025. (referred to as OU1). A small amount of contaminated sediment was removed from the ditch area, and residual contaminated soils around the ditch and in the Wood Storage Yard was covered by backfill.

Terry Creek Superfund Site, GA
SCA Associates for GEC

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2025 Successive sampling in Marsh Wood Storage Yard north of old outfall ditch footprint and in “southern parcel” south of new ditch; 1,581 cy of soil with highest toxaphene (greater than 210 ppm) excavated from north of old ditch, then entire area backfilled as Outfall Ditch project was completed (see removal areas below).



Source Documents

USACE Savannah District March 5, 1994 letter to John McKeown of EPA (two versions of attached Site Summary prepared by K. Morgan; dated March 1 and July 26)

EPA January 3, 1994 letter to Colonel Wayne Boy Savannah District USACE

USEPA April 1997 National Priorities List Terry Creek Dredge Spoil Areas/Hercules Outfall Hazard Ranking Scoring Documentation Record

Geosyntec December 4, 1998 Close-out Report on Sediment and Dredge Spoils Sampling

Geosyntec August 1, 2007 Briefing Terry Creek Overview and RI/FS Plan

Geosyntec December 2014 OU1 RI/FS Report

USEPA June 2015 Proposed Plan Fact Sheet Outfall Ditch OU1

USEPA June 2017 Interim Record of Decision Terry Creek Dredge Spoils Areas OU1 Outfall Ditch

Geosyntech March 2020 Remedial Design and Remedial Action Plan for Outfall Ditch OU1

Geosyntech August 2022 Soil Sampling and Analysis Plan Marsh Wood Storage Yard Terry Creek Dredge Spoil Site

Geosyntech January 2025 OU2/OU3 Scoping Study Sampling and Analysis Plan

Geosyntech March 2026 Remedial Action Report OU1 Outfall Ditch

Geosyntech March 4, 2026 Soil Sampling and Removal Report Marsh Wood Storage Yard OU1 Outfall Ditch

Glynn Environmental Coalition various documents in files covering the period 1990s - present