

**Tronox LLC, Columbus****General Information**

ID	Branch	SIC	County	Basin	Start	End
1696	Chemical	2491	Lowndes	Tombigbee River	10/27/1992	

**Address**

Physical Address (Primary)	Mailing Address
2300 14th Avenue North Columbus, MS 39701	PO Box 268859 Oklahoma City, OK 731268859

**Telecommunications**

Type	Address or Phone
Work phone number	(405) 775-5129

**Alternate / Historic AI Identifiers**

Alt ID	Alt Name	Alt Type	Start Date	End Date
2808700020	Tronox LLC, Columbus	Air-AIRS AFS	10/12/2000	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Construction	06/12/1998	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/06/1997	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/12/1998	06/01/2002
MSR220010	Kerr McGee Chemical Corporation, Columbus	GP-Wood Treating	10/27/1992	07/13/1997
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-EPA ID	10/12/2000	
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-TSD	06/11/2001	04/12/2006
MSD990866329	Tronox LLC, Columbus	Hazardous Waste-TSD	04/13/2006	05/31/2011
1696	Kerr McGee Chemical Corporation	Historic Site Name	10/27/1992	04/10/2006
1696	Tronox, LLC	Official Site Name	04/10/2006	
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/11/1994	10/10/1999
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	08/23/2000	07/31/2005
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/31/2005	04/12/2006
MSP090021	Tronox LLC, Columbus	Water-Pretreatment	04/13/2006	09/30/2010

**Regulatory Programs**

Program	SubProgram	Start Date	End Date
Air	NSPS Subpart Dc	09/12/1990	06/01/2002
Air	SM	06/06/1997	06/01/2002
Hazardous Waste	Large Quantity Generator	04/01/1997	
Hazardous Waste	TSD - Not Classified	06/11/2001	
Water	PT CIU	10/11/1994	09/01/2003
Water	PT CIU - Timber Products	10/11/1994	09/01/2003

	Processing (Subpart 429)		
Water	PT NCS	09/01/2003	
Water	PT SIU	10/11/1994	

**Locational Data**

Latitude	Longitude	Metadata	S / T / R	Map Links
33 ° 30 ' 38 .51 (033.510697)	88 ° 24 ' 34 .02 (088.409450)	<b>Point Desc:</b> PG - Plant entrance (General) Data collected by Louis Crawford on 7/11/00. PG - Plant Entrance (General) Data collected by Clift Jeter on 6/13/02. LAT 33deg 30min 36.6sec LON 88deg 24min 35.1sec  <b>Method:</b> GPS Code (Psuedo Range) Differential <b>Datum:</b> NAD83 <b>Type:</b> MDEQ	Section: Township: Range:	SWIMS TerraServer Map It

10/13/2006 10:29:50 AM

# Kerr McGee Chemical Corporation, Columbus

## General Information

ID	Branch	SIC	County	Basin	Start	End
1696	Chemical	2491	Lowndes	Tombigbee River	10/27/1992	

## Address

Physical Address (Primary)	Mailing Address
2300 14th Avenue North Columbus, MS 39701	PO Box 268859 Oklahoma City, OK 731268859

## Telecommunications

Type	Address or Phone
Work phone number	(405) 775-5110

## Alternate / Historic AI Identifiers

Alt ID	Alt Name	Alt Type	Start Date	End Date
08700020	Kerr McGee Chemical Corporation, Columbus	Air-AIRS AFS	10/12/2000	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Construction	06/12/1998	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/06/1997	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/12/1998	06/01/2002
MSR220010	Kerr McGee Chemical Corporation, Columbus	GP-Wood Treating	10/27/1992	07/13/1997
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-EPA ID	10/12/2000	
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-TSD	06/11/2001	05/31/2011
1696	Kerr McGee Chemical Corporation	Official Site Name	10/27/1992	
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/11/1994	10/10/1999
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	08/23/2000	07/31/2005
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/31/2005	09/30/2010

## Regulatory Programs

Program	SubProgram	Start Date	End Date

Air	NSPS Subpart Dc	09/12/1990	
Air	SM	06/06/1997	
Hazardous Waste	TSD - Not Classified	06/11/2001	
Water	PT CIU	10/11/1994	09/01/2003
Water	PT CIU - Timber Products Processing (Subpart 429)	10/11/1994	09/01/2003
Water	PT NCS	09/01/2003	
Water	PT SIU	10/11/1994	

**Locational Data**

Latitude	Longitude	Metadata	S / T / R	Map Links
33 ° 30 ' 38 .51 (033.510697)	88 ° 24 ' 34 .2 (088.409450)	<b>Point Desc:</b> PG - Plant entrance (General) Data collected by Louis Crawford on 7/11/00. PG - Plant Entrance (General) Data collected by Clift Jeter on 6/13/02. LAT 33deg 30min 36.6sec LON 88deg 24min 35.1sec  <b>Method:</b> GPS Code (Psuedo Range) Differential <b>Datum:</b> NAD83 <b>Type:</b> MDEQ	Section: Township: Range:	SWIMS TerraServer Map It

Report Date: 12/15/2005 9:06:32 AM

# MDEQ OPC Locational Data Entry Form

Page 1 of 1

Site Name: Kerr McGEE

Address:

City: Columbus State: MS Zip: \_\_\_\_\_

County: Louises

Site Unique Identifier: NPDES MSD 990866329

Site Unique Identifier Description: Permit # 90021  
(Permit#, EPA ID, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 36.6 Seconds

Longitude: 88 Degrees 24 Minutes 36.1 Seconds

Elevation: \_\_\_\_\_ ft.

Method of Collection: G3 - Differential ( $\pm 3m$ )

G6 - Autonomous ( $\pm 100m$ )

Point Description: ☒ PG - Plant Entrance (General)  
☐ NE - NE Corner of Land Parcel  
☐ SE - SE Corner of Land Parcel  
☐ NW - NW Corner of Land Parcel  
☐ SW - SE Corner of Land Parcel  
☐ CE - Center of Facility  
☐ WL - Well\*  
☐ WM - Ambient Water Mon. Station  
☐ AM - Ambient Air Mon. Station

Comments: \_\_\_\_\_  
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\*This point should be used only for wells in cases where there is no other identifiable facility.

Collected By: Clift Jeter

Date Collected: 6/13/02

# MDEQ OPC Locational Data Entry Form

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11/5/01-MD

Site Name: KERR-McGEE

Address: 2300 - 14<sup>th</sup> AVENUE NORTH MSD 990 866 329  
City: COLUMBUS State: MS Zip: 39701  
County: LOWNDES

Site Unique Identifier: FRONT DOOR TO OFFICE

Site Unique Identifier Description: SOUTH GATE  
(Permit#, EPA ID, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 38.51 Seconds  
33 Degrees 58 Minutes 15.56 Seconds

Longitude: 88 Degrees 24 Minutes 34.02 Seconds  
88 Degrees 29 Minutes 02.30 Seconds

Elevation: 236 ft.

Method of Collection: YG3 - Differential ( $\pm$  3m)  
G6 - Autonomous ( $\pm$  100m)

Point Description: ☒ PG - Plant Entrance (General)  
☐ NE - NE Corner of Land Parcel  
☐ SE - SE Corner of Land Parcel  
☐ NW - NW Corner of Land Parcel  
☐ SW - SE Corner of Land Parcel  
☐ CE - Center of Facility  
☐ WL - Well\*  
☐ WM - Ambient Water Mon. Station  
☐ AM - Ambient Air Mon. Station

Comments: \_\_\_\_\_  
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\*This point should be used only for wells in cases where there is no other identifiable facility.

Collected By: [Signature]

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: KERR - McGEE

Point Unique Identifier: ~~0000~~ Closed surface impoundments

Point Unique Identifier Description: RCRA Monitoring System R4  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.53 Seconds

Longitude: 48 Degrees 24 Minutes 36.49 Seconds

Elevation: 187 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
\_\_\_\_\_ G6 - Autonomous ( $\pm$  100m)

Point Description: \_\_\_\_\_ PP - Plant Entrance (Personnel)  
\_\_\_\_\_ PF - Plant Entrance (Freight)  
\_\_\_\_\_ AS - Air Release Stack  
\_\_\_\_\_ AV - Air Release Vent  
\_\_\_\_\_ ST - Storage Vent  
\_\_\_\_\_ WR - Water Release Pipe  
\_\_\_\_\_ SP - Lagoon or Settling Pond  
\_\_\_\_\_ LW - Liquid Waste Treatment Unit  
\_\_\_\_\_ AE - Atmos. Emissions Trtmt/Disp  
X SD - Solid Waste Tretmt/Disp Unit  
\_\_\_\_\_ SS - Solid Waste Storage Area  
\_\_\_\_\_ LF - Loading Facility  
\_\_\_\_\_ PU - Process Unit  
X WL - Well  
\_\_\_\_\_ WM - Water Monitoring Station  
\_\_\_\_\_ AM - Air Monitoring Station  
\_\_\_\_\_ OT - Other (Describe in Comments)  
\_\_\_\_\_ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: *[Signature]*

Date Collected: 11 JUL 02

Locational Data Entry Form Supplement

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Site Name: KERR MCGEE

Point Unique Identifier: CME-3

Point Unique Identifier Description: Monitoring Well (RCRA-GW)  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.14 Seconds

Longitude: 88 Degrees 24 Minutes 36.19 Seconds

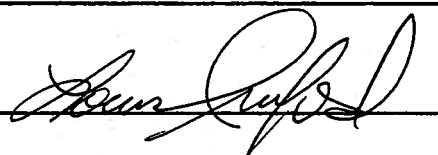
Elevation: 143 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00



Locational Data Entry Form Supplement

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Site Name: KERR - McGEE

Point Unique Identifier: CME-5

Point Unique Identifier Description: RCA GW Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 28.69 Seconds

Longitude: 88 Degrees 24 Minutes 14.29 Seconds

Elevation: 706 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

<input type="checkbox"/>	PP - Plant Entrance (Personnel)
<input type="checkbox"/>	PF - Plant Entrance (Freight)
<input type="checkbox"/>	AS - Air Release Stack
<input type="checkbox"/>	AV - Air Release Vent
<input type="checkbox"/>	ST - Storage Vent
<input type="checkbox"/>	WR - Water Release Pipe
<input type="checkbox"/>	SP - Lagoon or Settling Pond
<input type="checkbox"/>	LW - Liquid Waste Treatment Unit
<input type="checkbox"/>	AE - Atmos. Emissions Trtmt/Disp
<input type="checkbox"/>	SD - Solid Waste Tretmt/Disp Unit
<input type="checkbox"/>	SS - Solid Waste Storage Area
<input type="checkbox"/>	LF - Loading Facility
<input type="checkbox"/>	PU - Process Unit
<input checked="" type="checkbox"/>	WL - Well
<input type="checkbox"/>	WM - Water Monitoring Station
<input type="checkbox"/>	AM - Air Monitoring Station
<input type="checkbox"/>	OT - Other (Describe in Comments)
<input type="checkbox"/>	UN - Unknown

Comments: \_\_\_\_\_  
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Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: KERR - McGEE

Point Unique Identifier: CME-6

Point Unique Identifier Description: RCRA GW Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.30 Seconds

Longitude: 88 Degrees 24 Minutes 25.46 Seconds

Elevation:      ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

<input type="checkbox"/>	PP	- Plant Entrance (Personnel)
<input type="checkbox"/>	PF	- Plant Entrance (Freight)
<input type="checkbox"/>	AS	- Air Release Stack
<input type="checkbox"/>	AV	- Air Release Vent
<input type="checkbox"/>	ST	- Storage Vent
<input type="checkbox"/>	WR	- Water Release Pipe
<input type="checkbox"/>	SP	- Lagoon or Settling Pond
<input type="checkbox"/>	LW	- Liquid Waste Treatment Unit
<input type="checkbox"/>	AE	- Atmos. Emissions Trtmt/Disp
<input type="checkbox"/>	SD	- Solid Waste Tretmt/Disp Unit
<input type="checkbox"/>	SS	- Solid Waste Storage Area
<input type="checkbox"/>	LF	- Loading Facility
<input type="checkbox"/>	PU	- Process Unit
<input checked="" type="checkbox"/>	WL	- Well
<input type="checkbox"/>	WM	- Water Monitoring Station
<input type="checkbox"/>	AM	- Air Monitoring Station
<input type="checkbox"/>	OT	- Other (Describe in Comments)
<input type="checkbox"/>	UN	- Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: ~~CME-7~~ KERR - McGEE

Point Unique Identifier: CME-7

Point Unique Identifier Description: RCRA Gw Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.69 Seconds

Longitude: 88 Degrees 24 Minutes 19.30 Seconds

Elevation: 190 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

<u>    </u>	PP	- Plant Entrance (Personnel)
<u>    </u>	PF	- Plant Entrance (Freight)
<u>    </u>	AS	- Air Release Stack
<u>    </u>	AV	- Air Release Vent
<u>    </u>	ST	- Storage Vent
<u>    </u>	WR	- Water Release Pipe
<u>    </u>	SP	- Lagoon or Settling Pond
<u>    </u>	LW	- Liquid Waste Treatment Unit
<u>    </u>	AE	- Atmos. Emissions Trtmt/Disp
<u>    </u>	SD	- Solid Waste Trtmt/Disp Unit
<u>    </u>	SS	- Solid Waste Storage Area
<u>    </u>	LF	- Loading Facility
<u>    </u>	PU	- Process Unit
<u>X</u>	WL	- Well
<u>    </u>	WM	- Water Monitoring Station
<u>    </u>	AM	- Air Monitoring Station
<u>    </u>	OT	- Other (Describe in Comments)
<u>    </u>	UN	- Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: Kerr - McGee

Point Unique Identifier: CME-8

Point Unique Identifier Description: RCA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 26.71 Seconds

Longitude: 84 Degrees 24 Minutes 30.12 Seconds

Elevation: 140 ft.

Method of Collection: ☒ G3 - Differential ( $\pm 3m$ )  
☐ G6 - Autonomous ( $\pm 100m$ )

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: Steve Lupton

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: KERR McGEE

Point Unique Identifier: CMW 1AR

Point Unique Identifier Description: RCS GW Monitoring well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 38.52 Seconds

Longitude: 88 Degrees 24 Minutes 29.79 Seconds

Elevation: 144ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By:



Date Collected:

11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 3

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.42 Seconds

Longitude: 88 Degrees 24 Minutes 31.72 Seconds

Elevation: 190ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmnt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 6

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: <sup>33</sup>33 Degrees <sup>30</sup>30 Minutes <sup>36 06</sup>35.28 Seconds

Longitude: 88 Degrees 24 Minutes 32.36 Seconds

Elevation: 177ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

- PP - Plant Entrance (Personnel)
- PF - Plant Entrance (Freight)
- AS - Air Release Stack
- AV - Air Release Vent
- ST - Storage Vent
- WR - Water Release Pipe
- SP - Lagoon or Settling Pond
- LW - Liquid Waste Treatment Unit
- AE - Atmos. Emissions Trtmt/Disp
- SD - Solid Waste Tretmt/Disp Unit
- SS - Solid Waste Storage Area
- LF - Loading Facility
- PU - Process Unit
- X WL - Well
- WM - Water Monitoring Station
- AM - Air Monitoring Station
- OT - Other (Describe in Comments)
- UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: [Signature]

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Page 11 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 7

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.23 Seconds

Longitude: 88 Degrees 24 Minutes 33.22 Seconds

Elevation: 167 ft.

Method of Collection: ☒ G3 - Differential ( $\pm 3m$ )  
☐ G6 - Autonomous ( $\pm 100m$ )

Point Description:

<input type="checkbox"/>	PP	- Plant Entrance (Personnel)
<input type="checkbox"/>	PF	- Plant Entrance (Freight)
<input type="checkbox"/>	AS	- Air Release Stack
<input type="checkbox"/>	AV	- Air Release Vent
<input type="checkbox"/>	ST	- Storage Vent
<input type="checkbox"/>	WR	- Water Release Pipe
<input type="checkbox"/>	SP	- Lagoon or Settling Pond
<input type="checkbox"/>	LW	- Liquid Waste Treatment Unit
<input type="checkbox"/>	AE	- Atmos. Emissions Trtmt/Disp
<input type="checkbox"/>	SD	- Solid Waste Tretmt/Disp Unit
<input type="checkbox"/>	SS	- Solid Waste Storage Area
<input type="checkbox"/>	LF	- Loading Facility
<input type="checkbox"/>	PU	- Process Unit
<input checked="" type="checkbox"/>	WL	- Well
<input type="checkbox"/>	WM	- Water Monitoring Station
<input type="checkbox"/>	AM	- Air Monitoring Station
<input type="checkbox"/>	OT	- Other (Describe in Comments)
<input type="checkbox"/>	UN	- Unknown

Comments: \_\_\_\_\_  
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Collected By: [Signature]

Date Collected: 1 JUL 00



Locational Data Entry Form Supplement

Page 12 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 8

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.53 Seconds

Longitude: 88 Degrees 24 Minutes 33.93 Seconds

Elevation: 16 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

<u>    </u>	PP - Plant Entrance (Personnel)
<u>    </u>	PF - Plant Entrance (Freight)
<u>    </u>	AS - Air Release Stack
<u>    </u>	AV - Air Release Vent
<u>    </u>	ST - Storage Vent
<u>    </u>	WR - Water Release Pipe
<u>    </u>	SP - Lagoon or Settling Pond
<u>    </u>	LW - Liquid Waste Treatment Unit
<u>    </u>	AE - Atmos. Emissions Trtmt/Disp
<u>    </u>	SD - Solid Waste Tretmt/Disp Unit
<u>    </u>	SS - Solid Waste Storage Area
<u>    </u>	LF - Loading Facility
<u>    </u>	PU - Process Unit
<u>X</u>	WL - Well
<u>    </u>	WM - Water Monitoring Station
<u>    </u>	AM - Air Monitoring Station
<u>    </u>	OT - Other (Describe in Comments)
<u>    </u>	UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: [Signature]

Date Collected: 11/5/00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 11

Point Unique Identifier Description: RCA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.12 Seconds

Longitude: 84 Degrees 24 Minutes 27.62 Seconds

Elevation:      ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
X WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: [Signature]

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 14

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.46 Seconds

Longitude: 88 Degrees 24 Minutes 29.95 Seconds

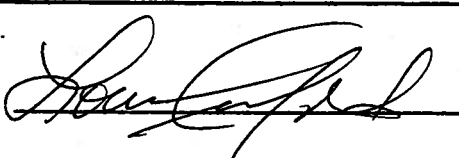
Elevation: 157ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

- PP - Plant Entrance (Personnel)
- PF - Plant Entrance (Freight)
- AS - Air Release Stack
- AV - Air Release Vent
- ST - Storage Vent
- WR - Water Release Pipe
- SP - Lagoon or Settling Pond
- LW - Liquid Waste Treatment Unit
- AE - Atmos. Emissions Trtmt/Disp
- SD - Solid Waste Tretmt/Disp Unit
- SS - Solid Waste Storage Area
- LF - Loading Facility
- PU - Process Unit
- X WL - Well
- WM - Water Monitoring Station
- AM - Air Monitoring Station
- OT - Other (Describe in Comments)
- UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 16

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.06 Seconds

Longitude: 88 Degrees 24 Minutes 36.45 Seconds

Elevation: 180 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

<u>    </u>	PP	- Plant Entrance (Personnel)
<u>    </u>	PF	- Plant Entrance (Freight)
<u>    </u>	AS	- Air Release Stack
<u>    </u>	AV	- Air Release Vent
<u>    </u>	ST	- Storage Vent
<u>    </u>	WR	- Water Release Pipe
<u>    </u>	SP	- Lagoon or Settling Pond
<u>    </u>	LW	- Liquid Waste Treatment Unit
<u>    </u>	AE	- Atmos. Emissions Trtmt/Disp
<u>    </u>	SD	- Solid Waste Tretmt/Disp Unit
<u>    </u>	SS	- Solid Waste Storage Area
<u>    </u>	LF	- Loading Facility
<u>    </u>	PU	- Process Unit
<u>X</u>	WL	- Well
<u>    </u>	WM	- Water Monitoring Station
<u>    </u>	AM	- Air Monitoring Station
<u>    </u>	OT	- Other (Describe in Comments)
<u>    </u>	UN	- Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 Jul 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 19

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 33.26 Seconds

Longitude: 88 Degrees 24 Minutes 25.60 Seconds

Elevation: 190 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: KERR - McGee

Point Unique Identifier: CMW 24

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 28.48 Seconds

Longitude: 88 Degrees 24 Minutes 14.37 Seconds

Elevation: 170 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 7/1/2000

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 26

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.57 Seconds

Longitude: 88 Degrees 24 Minutes 37.80 Seconds

Elevation: 170 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_

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Collected By: 

Date Collected: 11 JUL 02

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 27

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.22 Seconds

Longitude: 88 Degrees 24 Minutes 16.83 Seconds

Elevation: 170 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

<u>    </u>	PP - Plant Entrance (Personnel)
<u>    </u>	PF - Plant Entrance (Freight)
<u>    </u>	AS - Air Release Stack
<u>    </u>	AV - Air Release Vent
<u>    </u>	ST - Storage Vent
<u>    </u>	WR - Water Release Pipe
<u>    </u>	SP - Lagoon or Settling Pond
<u>    </u>	LW - Liquid Waste Treatment Unit
<u>    </u>	AE - Atmos. Emissions Trtmt/Disp
<u>    </u>	SD - Solid Waste Tretmt/Disp Unit
<u>    </u>	SS - Solid Waste Storage Area
<u>    </u>	LF - Loading Facility
<u>    </u>	PU - Process Unit
<u>X</u>	WL - Well
<u>    </u>	WM - Water Monitoring Station
<u>    </u>	AM - Air Monitoring Station
<u>    </u>	OT - Other (Describe in Comments)
<u>    </u>	UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: [Signature]

Date Collected: 11 JUL 00



**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 28

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.17 Seconds

Longitude: 96 Degrees 24 Minutes 14.45 Seconds

Elevation: 180 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11/20/00

Locational Data Entry Form Supplement

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 29

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.62 Seconds

Longitude: 88 Degrees 24 Minutes 15.68 Seconds

Elevation: 180 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 30

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.17 Seconds

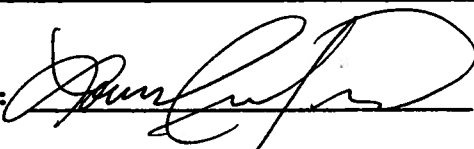
Longitude: 88 Degrees 24 Minutes 16.00 Seconds

Elevation: 177 ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Trtmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
  X   WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 1/5/00

Locational Data Entry Form Supplement

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 51

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude:      Degrees      Minutes      Seconds

Longitude:      Degrees      Minutes      Seconds

Elevation:      ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
☒ WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: Well temperature inaccessible

Collected By: 

Date Collected: 11/20/02

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 56

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 26.30 Seconds

Longitude: 88 Degrees 24 Minutes 34.94 Seconds

Elevation: 187 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
  X   WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: KERR - McGee

Point Unique Identifier: CMW 57

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude:      Degrees      Minutes      Seconds

Longitude:      Degrees      Minutes      Seconds

Elevation:      ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
☒ WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: Well Temporarily Inaccessible

Collected By: 

Date Collected: 11/20/00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 60

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 28.92 Seconds

Longitude: 88 Degrees 24 Minutes 12.18 Seconds

Elevation: 167 ft.

Method of Collection: ☒ G3 - Differential ( $\pm 3m$ )  
☐ G6 - Autonomous ( $\pm 100m$ )

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 1/5/2000

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 61

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.54 Seconds

Longitude: 88 Degrees 24 Minutes 12.26 Seconds

Elevation: 177 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
       G6 - Autonomous ( $\pm$  100m)

Point Description:

- PP - Plant Entrance (Personnel)
- PF - Plant Entrance (Freight)
- AS - Air Release Stack
- AV - Air Release Vent
- ST - Storage Vent
- WR - Water Release Pipe
- SP - Lagoon or Settling Pond
- LW - Liquid Waste Treatment Unit
- AE - Atmos. Emissions Trtmt/Disp
- SD - Solid Waste Tretmt/Disp Unit
- SS - Solid Waste Storage Area
- LF - Loading Facility
- PU - Process Unit
- X WL - Well
- WM - Water Monitoring Station
- AM - Air Monitoring Station
- OT - Other (Describe in Comments)
- UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 1/22/00



**Locational Data Entry Form Supplement**

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Site Name: KERR - McGee

Point Unique Identifier: CMW 65

Point Unique Identifier Description: RCA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude:      Degrees      Minutes      Seconds

Longitude:      Degrees      Minutes      Seconds

Elevation:      ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

- PP - Plant Entrance (Personnel)
- PF - Plant Entrance (Freight)
- AS - Air Release Stack
- AV - Air Release Vent
- ST - Storage Vent
- WR - Water Release Pipe
- SP - Lagoon or Settling Pond
- LW - Liquid Waste Treatment Unit
- AE - Atmos. Emissions Trtmt/Disp
- SD - Solid Waste Tretmt/Disp Unit
- SS - Solid Waste Storage Area
- LF - Loading Facility
- PU - Process Unit
- ☒ WL - Well
- WM - Water Monitoring Station
- AM - Air Monitoring Station
- OT - Other (Describe in Comments)
- UN - Unknown

Comments: Well Temporarily inaccessible

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Collected By: 

Date Collected: 11/21/00

**Locational Data Entry Form Supplement**

Page 29 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 66

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 26.36 Seconds

Longitude: 88 Degrees 24 Minutes 33.05 Seconds

Elevation: 177 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 1/1/02

Locational Data Entry Form Supplement

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Site Name: KERR McGEE

Point Unique Identifier: TRENCH 1A #1B

Point Unique Identifier Description: \_\_\_\_\_

(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.64 Seconds

Longitude: 86 Degrees 24 Minutes 31.62 Seconds

Elevation: 174 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description: ☐ PP - Plant Entrance (Personnel)  
☐ PF - Plant Entrance (Freight)  
☐ AS - Air Release Stack  
☐ AV - Air Release Vent  
☐ ST - Storage Vent  
☐ WR - Water Release Pipe  
☐ SP - Lagoon or Settling Pond  
☐ LW - Liquid Waste Treatment Unit  
☐ AE - Atmos. Emissions Trtmt/Disp  
☐ SD - Solid Waste Tretmt/Disp Unit  
☐ SS - Solid Waste Storage Area  
☐ LF - Loading Facility  
☐ PU - Process Unit  
☐ WL - Well  
☐ WM - Water Monitoring Station  
☐ AM - Air Monitoring Station  
☒ OT - Other (Describe in Comments)  
☐ UN - Unknown

Comments: Corrective Action Recovery trench - location  
taken at approximate intersection of Trenches 1A & 1B

Collected By: [Signature]

Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

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Site Name: KERR McGEE

Point Unique Identifier: TRENCH 2

Point Unique Identifier Description: \_\_\_\_\_

(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes <sup>50 70</sup> 28.81 Seconds

Longitude: 88 Degrees 24 Minutes <sup>17 28</sup> 24.60 Seconds

Elevation: 173 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description: ☐ PP - Plant Entrance (Personnel)  
☐ PF - Plant Entrance (Freight)  
☐ AS - Air Release Stack  
☐ AV - Air Release Vent  
☐ ST - Storage Vent  
☐ WR - Water Release Pipe  
☐ SP - Lagoon or Settling Pond  
☐ LW - Liquid Waste Treatment Unit  
☐ AE - Atmos. Emissions Trtmt/Disp  
☐ SD - Solid Waste Tretmt/Disp Unit  
☐ SS - Solid Waste Storage Area  
☐ LF - Loading Facility  
☐ PU - Process Unit  
☐ WL - Well  
☐ WM - Water Monitoring Station  
☐ AM - Air Monitoring Station  
☒ OT - Other (Describe in Comments)  
☐ UN - Unknown

Comments: Corrective action recovery trench - South end

Collected By: [Signature]

Date Collected: 11/20/00

Locational Data Entry Form Supplement

Page 32 of 32

Site Name: Ken - Mc Gee

Point Unique Identifier: DRIP PAD

Point Unique Identifier Description: RCRA RU (Generator Status)  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude:      Degrees      Minutes      Seconds

Longitude:      Degrees      Minutes      Seconds

Elevation:      ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)

     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmnt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
  X   PU - Process Unit  
     WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: Missed

Collected By: 

Date Collected:

**MDEQ OPC Locational Data Entry Form**Page 1 of 32Site Name: KERR-McGEEAddress: 2300 - 14<sup>th</sup> AVENUE NORTHCity: COLUMBUS State: MS Zip: 39701County: LOWNDESSite Unique Identifier: FRONT DOOR TO OFFICESite Unique Identifier Description: SOUTH GATE

(Permit#, EPA ID, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 38.51 SecondsLongitude: 88 Degrees 24 Minutes 34.02 SecondsElevation: 236 ft.Method of Collection: YG3 - Differential ( $\pm$  3m)G6 - Autonomous ( $\pm$  100m)

Point Description: ☒ PG - Plant Entrance (General)  
☐ NE - NE Corner of Land Parcel  
☐ SE - SE Corner of Land Parcel  
☐ NW - NW Corner of Land Parcel  
☐ SW - SE Corner of Land Parcel  
☐ CE - Center of Facility  
☐ WL - Well\*  
☐ WM - Ambient Water Mon. Station  
☐ AM - Ambient Air Mon. Station

Comments: \_\_\_\_\_  
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\*This point should be used only for wells in cases where there is no other identifiable facility.

Collected By: [Signature]Date Collected: 11 JUL 00

Locational Data Entry Form Supplement

Page 2 of 32

Site Name: KERR - McGEE

Point Unique Identifier: ~~0000~~ Closed surface impoundments  
Point Unique Identifier Description: BCRA ~~Monitoring Station~~ RL  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.53 Seconds

Longitude: 88 Degrees 24 Minutes 36.49 Seconds

Elevation: 187 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

- PP - Plant Entrance (Personnel)
- PF - Plant Entrance (Freight)
- AS - Air Release Stack
- AV - Air Release Vent
- ST - Storage Vent
- WR - Water Release Pipe
- SP - Lagoon or Settling Pond
- LW - Liquid Waste Treatment Unit
- AE - Atmos. Emissions Trtmt/Disp
- X SD - Solid Waste Tretmt/Disp Unit
- SS - Solid Waste Storage Area
- LF - Loading Facility
- PU - Process Unit
- X WL - Well
- WM - Water Monitoring Station
- AM - Air Monitoring Station
- OT - Other (Describe in Comments)
- UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: *[Signature]*

Date Collected: 11 JUL 02

**Locational Data Entry Form Supplement**

Page 3 of 32

Site Name: KERR McGEE

Point Unique Identifier: CME-3

Point Unique Identifier Description: Monitoring Well (RCR-64)  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.14 Seconds

Longitude: 88 Degrees 24 Minutes 36.19 Seconds

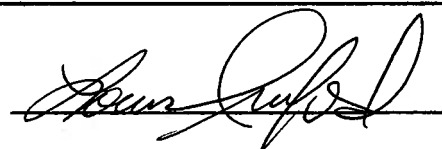
Elevation: 113 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00



**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CME-5

Point Unique Identifier Description: RCA GW Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 28.69 Seconds

Longitude: 88 Degrees 24 Minutes 14.29 Seconds


Elevation: 706 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - MCGEE

Point Unique Identifier: CME-6

Point Unique Identifier Description: RCRA GW Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.30 Seconds

Longitude: 88 Degrees 24 Minutes 25.46 Seconds


Elevation:      ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: ~~CME-7~~ KERR - McGEE

Point Unique Identifier: CME-7

Point Unique Identifier Description: RCRA Gw Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.69 Seconds

Longitude: 88 Degrees 24 Minutes 19.30 Seconds

Elevation: 190 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

<u>    </u>	PP - Plant Entrance (Personnel)
<u>    </u>	PF - Plant Entrance (Freight)
<u>    </u>	AS - Air Release Stack
<u>    </u>	AV - Air Release Vent
<u>    </u>	ST - Storage Vent
<u>    </u>	WR - Water Release Pipe
<u>    </u>	SP - Lagoon or Settling Pond
<u>    </u>	LW - Liquid Waste Treatment Unit
<u>    </u>	AE - Atmos. Emissions Trtmt/Disp
<u>    </u>	SD - Solid Waste Tretmt/Disp Unit
<u>    </u>	SS - Solid Waste Storage Area
<u>    </u>	LF - Loading Facility
<u>    </u>	PU - Process Unit
<u>X</u>	WL - Well
<u>    </u>	WM - Water Monitoring Station
<u>    </u>	AM - Air Monitoring Station
<u>    </u>	OT - Other (Describe in Comments)
<u>    </u>	UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: Kerr - McGee

Point Unique Identifier: CME-8

Point Unique Identifier Description: RCA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 26.71 Seconds

Longitude: 84 Degrees 24 Minutes 30.12 Seconds

Elevation: 140 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

<input type="checkbox"/>	PP - Plant Entrance (Personnel)
<input type="checkbox"/>	PF - Plant Entrance (Freight)
<input type="checkbox"/>	AS - Air Release Stack
<input type="checkbox"/>	AV - Air Release Vent
<input type="checkbox"/>	ST - Storage Vent
<input type="checkbox"/>	WR - Water Release Pipe
<input type="checkbox"/>	SP - Lagoon or Settling Pond
<input type="checkbox"/>	LW - Liquid Waste Treatment Unit
<input type="checkbox"/>	AE - Atmos. Emissions Trtmt/Disp
<input type="checkbox"/>	SD - Solid Waste Tretmt/Disp Unit
<input type="checkbox"/>	SS - Solid Waste Storage Area
<input type="checkbox"/>	LF - Loading Facility
<input type="checkbox"/>	PU - Process Unit
<input checked="" type="checkbox"/>	WL - Well
<input type="checkbox"/>	WM - Water Monitoring Station
<input type="checkbox"/>	AM - Air Monitoring Station
<input type="checkbox"/>	OT - Other (Describe in Comments)
<input type="checkbox"/>	UN - Unknown

Comments: \_\_\_\_\_  
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Collected By:



Date Collected:

11 JUL 00

Locational Data Entry Form Supplement

Page 0 of 32

Site Name: KERR McGEE

Point Unique Identifier: CMW 1AR

Point Unique Identifier Description: RCA GW Monitoring well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 38.52 Seconds

Longitude: 88 Degrees 24 Minutes 29.79 Seconds

Elevation: 144 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmnt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By:



Date Collected:

11 JUL 00

**Locational Data Entry Form Supplement**

Page 9 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 3

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.42 Seconds

Longitude: 88 Degrees 24 Minutes 31.72 Seconds

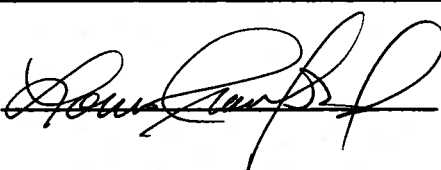
Elevation: 190 Ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:

- PP - Plant Entrance (Personnel)
- PF - Plant Entrance (Freight)
- AS - Air Release Stack
- AV - Air Release Vent
- ST - Storage Vent
- WR - Water Release Pipe
- SP - Lagoon or Settling Pond
- LW - Liquid Waste Treatment Unit
- AE - Atmos. Emissions Trtmnt/Disp
- SD - Solid Waste Tretmt/Disp Unit
- SS - Solid Waste Storage Area
- LF - Loading Facility
- PU - Process Unit
- X WL - Well
- WM - Water Monitoring Station
- AM - Air Monitoring Station
- OT - Other (Describe in Comments)
- UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 6

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: <sup>33</sup>~~33~~ Degrees <sup>30</sup>~~30~~ Minutes <sup>36 06</sup>~~35.23~~ Seconds

Longitude: 88 Degrees 24 Minutes 32 . 36 Seconds

Elevation: 177ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
         G6 - Autonomous ( $\pm$  100m)

Point Description:          PP - Plant Entrance (Personnel)  
         PF - Plant Entrance (Freight)  
         AS - Air Release Stack  
         AV - Air Release Vent  
         ST - Storage Vent  
         WR - Water Release Pipe  
         SP - Lagoon or Settling Pond  
         LW - Liquid Waste Treatment Unit  
         AE - Atmos. Emissions Trtmt/Disp  
         SD - Solid Waste Tretmt/Disp Unit  
         SS - Solid Waste Storage Area  
         LF - Loading Facility  
         PU - Process Unit  
X WL - Well  
         WM - Water Monitoring Station  
         AM - Air Monitoring Station  
         OT - Other (Describe in Comments)  
         UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: [Signature]

Date Collected: 11 JUL 02

**Locational Data Entry Form Supplement**

Page 11 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 7

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.23 Seconds

Longitude: 88 Degrees 24 Minutes 33.22 Seconds

Elevation: 167 ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
X WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: *Sam Lufkin*

Date Collected: 1/1/00



**Locational Data Entry Form Supplement**

Page 12 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 8

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.53 Seconds

Longitude: 88 Degrees 24 Minutes 33.93 Seconds

Elevation: 16 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: [Signature]

Date Collected: 11 JUL 88

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 11

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.12 Seconds

Longitude: 88 Degrees 24 Minutes 27.62 Seconds

Elevation:      ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
X WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 14

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 34.46 Seconds

Longitude: 88 Degrees 24 Minutes 29.95 Seconds

Elevation: 157ft.

Method of Collection: X G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
  X   WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

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Site Name: KERR - McGEE

Point Unique Identifier: CMW 16

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.06 Seconds

Longitude: 88 Degrees 24 Minutes 36.45 Seconds

Elevation: 180 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_

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Collected By: 

Date Collected: 11 Jul 00

**Locational Data Entry Form Supplement**

Page 16 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 19

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 33.26 Seconds

Longitude: 88 Degrees 24 Minutes 25.60 Seconds

Elevation: 190 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmnt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

Page 17 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 24

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 28.48 Seconds

Longitude: 88 Degrees 24 Minutes 14.37 Seconds

Elevation: 170 ft.

Method of Collection: G3 - Differential ( $\pm$  3m)  
G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: Louis L. L. L.

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

Page 18 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW26

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30.57 Seconds

Longitude: 88 Degrees 24 Minutes 37.80 Seconds

Elevation: 170 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 02

**Locational Data Entry Form Supplement**

Page 19 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 27

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.27 Seconds

Longitude: 88 Degrees 24 Minutes 16.83 Seconds

Elevation: 170 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmnt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00



**Locational Data Entry Form Supplement**

Page 20 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 28

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 35.17 Seconds

Longitude: 86 Degrees 24 Minutes 14.45 Seconds

Elevation: 180 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11/5/00

**Locational Data Entry Form Supplement**

Page 21 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 29

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.67 Seconds

Longitude: 88 Degrees 24 Minutes 15.68 Seconds

Elevation: 181 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmnt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

Page 22 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 30

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.17 Seconds

Longitude: 88 Degrees 24 Minutes 16.06 Seconds

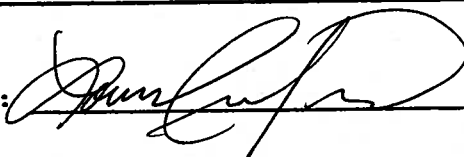
Elevation: 177 ft.

Method of Collection: G3 - Differential ( $\pm$  3m)  
G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 1/5/00

**Locational Data Entry Form Supplement**

Page 23 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 51

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude:      Degrees      Minutes      Seconds

Longitude:      Degrees      Minutes      Seconds

Elevation:      ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)

     G6 - Autonomous ( $\pm$  100m)

Point Description:

- PP - Plant Entrance (Personnel)
- PF - Plant Entrance (Freight)
- AS - Air Release Stack
- AV - Air Release Vent
- ST - Storage Vent
- WR - Water Release Pipe
- SP - Lagoon or Settling Pond
- LW - Liquid Waste Treatment Unit
- AE - Atmos. Emissions Trtmnt/Disp
- SD - Solid Waste Tretmt/Disp Unit
- SS - Solid Waste Storage Area
- LF - Loading Facility
- PU - Process Unit
- ☒ WL - Well
- WM - Water Monitoring Station
- AM - Air Monitoring Station
- OT - Other (Describe in Comments)
- UN - Unknown

Comments: Well temporarily inaccessible

Collected By: 

Date Collected: 11/20/02

**Locational Data Entry Form Supplement**

Page 2A of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 56

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 26.30 Seconds

Longitude: 88 Degrees 24 Minutes 34.94 Seconds

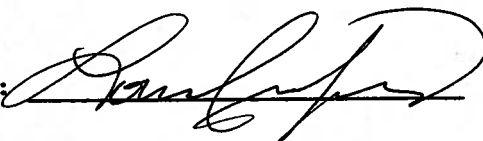
Elevation: 187 ft.

Method of Collection: G3 - Differential ( $\pm$  3m)  
G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 11 JUL 00

**Locational Data Entry Form Supplement**

Page 25 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 57

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude:      Degrees      Minutes      Seconds

Longitude:      Degrees      Minutes      Seconds

Elevation:      ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
☒ WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: Well Temporarily Inaccessible

Collected By: 

Date Collected: 1/15/00

**Locational Data Entry Form Supplement**

Page 26 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 60

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 28.92 Seconds

Longitude: 88 Degrees 24 Minutes 12.18 Seconds

Elevation: 167 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 1/5/00

**Locational Data Entry Form Supplement**

Page 27 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 61

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.54 Seconds

Longitude: 88 Degrees 24 Minutes 12.26 Seconds

Elevation: 177 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_  
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Collected By: 

Date Collected: 1/12/00



**Locational Data Entry Form Supplement**

Page 28 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 65

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude:      Degrees      Minutes      Seconds

Longitude:      Degrees      Minutes      Seconds

Elevation:      ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
     PU - Process Unit  
☒ WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: Well Temporarily inaccessible

Collected By: 

Date Collected: 11/20/00

**Locational Data Entry Form Supplement**

Page 29 of 32

Site Name: KERR - McGEE

Point Unique Identifier: CMW 66

Point Unique Identifier Description: RCRA Monitoring Well  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 26.36 Seconds

Longitude: 88 Degrees 24 Minutes 33.05 Seconds

Elevation: 177 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description:

- ☐ PP - Plant Entrance (Personnel)
- ☐ PF - Plant Entrance (Freight)
- ☐ AS - Air Release Stack
- ☐ AV - Air Release Vent
- ☐ ST - Storage Vent
- ☐ WR - Water Release Pipe
- ☐ SP - Lagoon or Settling Pond
- ☐ LW - Liquid Waste Treatment Unit
- ☐ AE - Atmos. Emissions Trtmt/Disp
- ☐ SD - Solid Waste Tretmt/Disp Unit
- ☐ SS - Solid Waste Storage Area
- ☐ LF - Loading Facility
- ☐ PU - Process Unit
- ☒ WL - Well
- ☐ WM - Water Monitoring Station
- ☐ AM - Air Monitoring Station
- ☐ OT - Other (Describe in Comments)
- ☐ UN - Unknown

Comments: \_\_\_\_\_

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Collected By: 

Date Collected: 1/1/02

**Locational Data Entry Form Supplement**

Page 30 of 32

Site Name: KERR McGEE

Point Unique Identifier: TRENCH 1A #1B

Point Unique Identifier Description: \_\_\_\_\_  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 27.64 Seconds

Longitude: 88 Degrees 24 Minutes 31.62 Seconds

Elevation: 174 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description: \_\_\_\_\_ PP - Plant Entrance (Personnel)  
\_\_\_\_\_ PF - Plant Entrance (Freight)  
\_\_\_\_\_ AS - Air Release Stack  
\_\_\_\_\_ AV - Air Release Vent  
\_\_\_\_\_ ST - Storage Vent  
\_\_\_\_\_ WR - Water Release Pipe  
\_\_\_\_\_ SP - Lagoon or Settling Pond  
\_\_\_\_\_ LW - Liquid Waste Treatment Unit  
\_\_\_\_\_ AE - Atmos. Emissions Trtmnt/Disp  
\_\_\_\_\_ SD - Solid Waste Tretmt/Disp Unit  
\_\_\_\_\_ SS - Solid Waste Storage Area  
\_\_\_\_\_ LF - Loading Facility  
\_\_\_\_\_ PU - Process Unit  
\_\_\_\_\_ WL - Well  
\_\_\_\_\_ WM - Water Monitoring Station  
\_\_\_\_\_ AM - Air Monitoring Station  
☒ OT - Other (Describe in Comments)  
\_\_\_\_\_ UN - Unknown

Comments: Corrective Action Recovery trench - location  
taken at approximate intersection of Trenches 1A & 1B

Collected By: [Signature]

Date Collected: 11 JUN 00

Locational Data Entry Form Supplement

Page 31 of 32

Site Name: KERR McGEE

Point Unique Identifier: TRENCH 2

Point Unique Identifier Description: \_\_\_\_\_

(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude: 33 Degrees 30 Minutes 30 <sup>30</sup> ~~28~~ <sup>70</sup> ~~81~~ Seconds

Longitude: 88 Degrees 24 Minutes 17 <sup>28</sup> ~~17~~ <sup>28</sup> ~~66~~ Seconds

Elevation: 173 ft.

Method of Collection: ☒ G3 - Differential ( $\pm$  3m)  
☐ G6 - Autonomous ( $\pm$  100m)

Point Description: ☐ PP - Plant Entrance (Personnel)  
☐ PF - Plant Entrance (Freight)  
☐ AS - Air Release Stack  
☐ AV - Air Release Vent  
☐ ST - Storage Vent  
☐ WR - Water Release Pipe  
☐ SP - Lagoon or Settling Pond  
☐ LW - Liquid Waste Treatment Unit  
☐ AE - Atmos. Emissions Trtmnt/Disp  
☐ SD - Solid Waste Tretmt/Disp Unit  
☐ SS - Solid Waste Storage Area  
☐ LF - Loading Facility  
☐ PU - Process Unit  
☐ WL - Well  
☐ WM - Water Monitoring Station  
☐ AM - Air Monitoring Station  
☒ OT - Other (Describe in Comments)  
☐ UN - Unknown

Comments: Corrective action recovery trench - South end

Collected By: [Signature]

Date Collected: 1/1/00

**Locational Data Entry Form Supplement**

Page 32 of 32

Site Name: Ken - McGee

Point Unique Identifier: DRIP PAD

Point Unique Identifier Description: RCRA RU (Generator Status)  
(Stack #, Discharge #, Monitoring Station #, etc...)

Latitude:      Degrees      Minutes      Seconds

Longitude:      Degrees      Minutes      Seconds

Elevation:      ft.

Method of Collection:      G3 - Differential ( $\pm$  3m)  
     G6 - Autonomous ( $\pm$  100m)

Point Description:      PP - Plant Entrance (Personnel)  
     PF - Plant Entrance (Freight)  
     AS - Air Release Stack  
     AV - Air Release Vent  
     ST - Storage Vent  
     WR - Water Release Pipe  
     SP - Lagoon or Settling Pond  
     LW - Liquid Waste Treatment Unit  
     AE - Atmos. Emissions Trtmnt/Disp  
     SD - Solid Waste Tretmt/Disp Unit  
     SS - Solid Waste Storage Area  
     LF - Loading Facility  
  X   PU - Process Unit  
     WL - Well  
     WM - Water Monitoring Station  
     AM - Air Monitoring Station  
     OT - Other (Describe in Comments)  
     UN - Unknown

Comments: Missed

Collected By 

Date Collected:

# STATE OF MISSISSIPPI,

## County of Lowndes

PERSONALLY CAME before me, the undersigned, a notary public in and for Lowndes County, Mississippi, the CLERK of the Commercial Dispatch, a newspaper published in the City of Columbus, who, being duly sworn, deposes and says that the COMMERCIAL DISPATCH is a newspaper as defined and prescribed in Section 13-3-31 of the Mississippi Code of 1972, as amended effective July 1, 1976, and that the publication of a notice, of which the annexed is a copy, in the matter of

Public notice

has been made in said paper 1 times consecutively, to-wit:

On the 16 day of April, 2001

On the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

Ann Lewis

Clerk

SWORN TO and subscribed before me, this

16 day of April, 2001

Rynda H. H. H.  
05-28-05 Notary Public

PUBLIC NOTICE  
Mississippi Environmental Quality  
Permit Board  
P.O. Box 10385  
Jackson, Mississippi 39289-0385  
Telephone No. (601) 961-5171  
April 18, 2001

Kerr-McGee Chemical, LLC- Forest Products Division, 2300 14th Avenue North in Columbus, Lowndes County, Mississippi, has applied to the Mississippi Department of Environmental Quality for reissuance of the following permit: RCRA Permit HW-990-865-329. The applicant's mailing address is P.O. Box 9310, Columbus, MS 39701. The applicant's operation is the pressure treatment of railroad products including wooden cross ties, switch ties, and timbers. The SIC Code is 2491. The proposed permit authorizes and requires the Permittee to conduct Post-Closure Care of closed hazardous waste surface impoundments and to perform corrective action of contaminated groundwater beneath the entire site. These activities are meant to reduce existing contamination and to prevent additional movement of contamination on and near the site. In addition to requiring on-site remediation, this permit requires remediation of a small amount of contaminated groundwater immediately adjacent to the east and to the south of Kerr-McGee property. A second area of possible off-site contamination further to the east along Waterworks Road is currently being investigated by EPA under separate action and is not addressed in this permit. Should future permit modifications be necessary regarding off-site contamination, public comments will be solicited at that time.

Please note that this is not a new permit but a reissuance of a permit held by Kerr-McGee since 1990. At this time, Kerr-McGee was required to begin remediation of the property. The reissuance of this permit will allow remediation activities to continue.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determination are invited to submit comments in writing to Louis Crawford at the Permit Board's address shown above, no later than June 1, 2001. All comments received by this date will be considered in the formulation of final determination regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit. The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

Additional details about the application, including a copy of the draft permit, are available by writing or calling Louis Crawford at the above Permit Board address and telephone number. This information is also available for review at the following locations during normal business hours:

Mississippi Department of  
Environmental Quality  
Office of Pollution Control  
Southport Center Building  
2380 Highway 80 West  
Jackson, Mississippi 39204

Columbus Public Library  
314 Seventh Street, North  
Columbus, Mississippi 39701

Please bring the foregoing to the attention of persons whom you know will be interested.

WJWF-AM/CUM  
RADIO COPY  
4/23/01

APR 20 2001

KERR-MCG  
Lowndes  
RCRA-  
Permitting  
flap 3

CLIENT: MS DEPT OF ENVIRONMENTAL  
WRITER:  
DESCPT:

CONTRACT NUMBER: 3726  
COMMERCIAL LENGTH: 30  
CART NUMBER: 36  
CO-OP COPY ITEM: 1

START: 4/16/01 STOP: 4/18/01

THE MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY ANNOUNCES  
THE AVAILABILITY OF INFORMATION RELATED TO ITS PROPOSAL TO  
REISSUE A HAZARDOUS WASTE POST-CLOSURE CARE AND CORRECTIVE  
ACTION PERMIT TO KERR-MCGEE CHEMICAL, LLC - FOREST PRODUCTS  
DIVISION FOR THEIR COLUMBUS, MISSISSIPPI SITE. THIS PROJECT IS  
UNRELATED TO OTHER AREAS CURRENTLY BEING INVESTIGATED BY EPA.  
THE DEPARTMENT IS ACCEPTING COMMENTS UNTIL JUNE 1, 2001, AND  
WILL HOLD A PUBLIC HEARING IF SIGNIFICANT INTEREST IS SHOWN. IF  
YOU HAVE ANY QUESTIONS, CONTACT LOUIS CRAWFORD AT 961-5171.

This announcement was broadcast 6 times, as entered in the  
station's program log. The times this announcement was broadcast  
were billed to this station's client on our invoice(s)  
number 243, dated 4/22/01, at an earned rate of:

\$10.00 each for 6 announcements, for a total of \$60.00

*Cheryl L. Peery*

CHERYL L. PEERY  
Notary Public

12/07/01  
Commission Expires

*Sheila A. Jones*  
SHEILA A. JONES  
Station Representative

4/23/01  
Date

permit file  
Flap 3



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 9, 2001

Mr. Bob Green, General Manager  
Cumulus Broadcasting  
WJWF-AM  
601 2<sup>nd</sup> Avenue North  
Court Square Towers  
Columbus, MS 39701

**FILE COPY**

Dear Mr. Green:

Re: Public Notice  
RCRA Permit HW-990-866-329  
Kerr-McGee Chemical, LLC - Forest Products Division  
Columbus, Lowndes County

Pursuant to our telephone discussion today, please make the referenced announcements on WJWF rather than WSSO.

Enclosed herewith is a legal notice to be broadcast on your station twice daily for three (3) consecutive days beginning April 16, 2001.

After the announcements have been made, please send the original and one (1) copy of your bill along with a certification that all six (6) announcements were made. All billing inquiries should be addressed to Ms. Linda Stanford at the above address.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Crawford", written over a horizontal line.

Louis Crawford, P.E.  
Environmental Permits Division

Enclosure

pc: Ms. Linda Stanford, OPC (9701)

d22/ RCRA/pn-rs1



RADIO ANNOUNCEMENT

THE MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY ANNOUNCES THE AVAILABILITY OF INFORMATION RELATED TO ITS PROPOSAL TO REISSUE A HAZARDOUS WASTE POST-CLOSURE CARE AND CORRECTIVE ACTION PERMIT TO KERR-McGEE CHEMICAL, LLC - FOREST PRODUCTS DIVISION FOR THEIR COLUMBUS, MISSISSIPPI SITE. THIS PROJECT IS UNRELATED TO OTHER AREAS CURRENTLY BEING INVESTIGATED BY EPA. THE DEPARTMENT IS ACCEPTING COMMENTS UNTIL JUNE 1, 2001, AND WILL HOLD A PUBLIC HEARING IF SIGNIFICANT INTEREST IS SHOWN. IF YOU HAVE ANY QUESTIONS, CONTACT LOUIS CRAWFORD AT 961-5171.



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 6, 2001

**FILE COPY**

Mr. Stephen A. Ladner  
Staff Environmental Specialist  
Kerr-McGee Chemical, LLC  
P.O. Box 25861  
Oklahoma City, OK 73125

Dear Mr. Ladner:

Re: Public Notice  
Kerr-McGee Chemical, LLC  
Forest Products Division  
Columbus, Lowndes County  
RCRA Permit HW-990-866-329

Enclosed is the public notice and draft of the above referenced permit. If you have not already done so, you are invited to submit written comments by no later than June 1, 2001. A decision regarding the proposed permit will be made after all public comments have been duly considered.

If you have any questions, please contact me at 601-961-5171.

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

Enclosures



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 6, 2001

**FILE COPY**

Librarian  
Columbus Public Library  
314 Seventh Street North  
Columbus, MS 39701

Dear Librarian:

Re: Public Notice  
Kerr-McGee Chemical, LLC  
Forest Products Division  
Columbus, Lowndes County  
RCRA Permit HW-990-866-329

Enclosed is a copy of the public notice for comment on the above referenced environmental permit. Please post this notice in your library.

Also, enclosed is a copy of information pertinent to the permit. This information should be kept on hand for review by the public until June 1, 2001, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library.

Finally, enclosed please find a duplication of this letter with a place for your signature and the date acknowledging your receipt of the package and your agreement to carry out our request. A self-addressed stamped envelope is enclosed for your convenience.

We are attempting to better keep the public informed of and involved in this Office's actions regarding permitting of new and expanding industry. Since access to the public library is so convenient for so many we hope to use these facilities as often as possible. Your cooperation in this matter is greatly appreciated.

If you have any questions, please let me know at 601-961-5171.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Crawford", written over a horizontal line.

Louis Crawford, P.E.  
Environmental Permits Division

Enclosure



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 6, 2001

FILE COPY

Librarian  
Columbus Public Library  
314 Seventh Street North  
Columbus, MS 39701

Dear Librarian:

Re: Public Notice  
Kerr-McGee Chemical, LLC  
Forest Products Division  
Columbus, Lowndes County  
RCRA Permit HW-990-866-329

Enclosed is a copy of the public notice for comment on the above referenced environmental permit. Please post this notice in your library.

Also, enclosed is a copy of information pertinent to the permit. This information should be kept on hand for review by the public until June 1, 2001, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library.

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If you have any questions, please let me know at (601) 961-5171.

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

Enclosure

Received and Agreed to By: \_\_\_\_\_ Title: \_\_\_\_\_

Date: \_\_\_\_\_



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 6, 2001

Postmaster  
Columbus, Mississippi 39704

**FILE COPY**

Dear Postmaster:

Re: Public Notice  
Kerr-McGee Chemical, LLC  
Forest Products Division  
Columbus, Lowndes County  
RCRA Permit HW-990-866-329

Please post the attached public notice in your post office on April 16, 2001.

If you are unable to do so or if you have any questions, please contact me at 601-961-5171.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Crawford", written over the printed name.

Louis Crawford, P.E.  
Environmental Permits Division

Attachment



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 6, 2001

Lowndes County Chancery Clerk  
P.O. Box 684  
Columbus, MS 39703

**FILE COPY**

Dear Sir/Madam:

Re: Public Notice  
Kerr-McGee Chemical, LLC  
Forest Products Division  
Columbus, Lowndes County  
RCRA Permit HW-990-866-329

Please post the attached public notice in your courthouse on April 16, 2001.

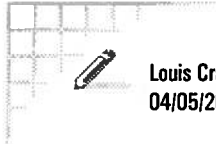
If you are unable to do so or if you have any questions, please contact me at 601-961-5171.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Crawford", with a large, stylized flourish at the end.

Louis Crawford, P.E.  
Environmental Permits Division

Attachment



Louis Crawford  
04/05/2001 09:17 AM

To: LEGALS@jackson.gannett.com @ INETDEQ  
cc: Linda Stanford/OPC/DEQ  
Subject: Public Notice

April 6, 2001

TRANSMITTED VIA E-MAIL

Ms. Marie Mills  
The *Clarion-Ledger*  
P. O. Box 40  
Jackson, MS 39205

**FILE COPY**

Dear Ms. Mills:

Re: Application for Reissuance  
RCRA Permit No. HW-990-866-329  
Kerr-McGee Chemical, LLC  
Columbus, Lowndes County

Attached herewith is a legal notice to be published in your newspaper **on April 16, 2001**. Also, please furnish this office with statement and proof of publication in duplicate.

If there are questions concerning this legal notice, please contact me at 601-961-5117.

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

Attachment

cc: Ms. Linda Stanford, OPC (9701)

D22/RCRA/pn-cl



pn-form.wpd



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR  
April 6, 2001

Mr. Bob Green, General Manager  
WSSO-AM  
601 2<sup>nd</sup> Avenue North  
Court Square Towers  
Columbus, MS 39701

**FILE COPY**

Dear Mr. Green:

Re: Public Notice  
RCRA Permit HW-990-866-329  
Kerr-McGee Chemical, LLC - Forest Products Division  
Columbus, Lowndes County

Enclosed herewith is a legal notice to be broadcast on your station twice daily for three (3) consecutive days beginning April 16, 2001.

After the announcements have been made, please send the original and one (1) copy of your bill along with a certification that all six (6) announcements were made. All billing inquiries should be addressed to Ms. Linda Stanford at the above address.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Crawford", written over a large, stylized, circular flourish.

Louis Crawford, P.E.  
Environmental Permits Division

Enclosure

pc: Ms. Linda Stanford, OPC (9701)

d22/ RCRA/pn-rs



**RADIO ANNOUNCEMENT**

**THE MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY ANNOUNCES THE AVAILABILITY OF INFORMATION RELATED TO ITS PROPOSAL TO REISSUE A HAZARDOUS WASTE POST-CLOSURE CARE AND CORRECTIVE ACTION PERMIT TO KERR-McGEE CHEMICAL, LLC - FOREST PRODUCTS DIVISION FOR THEIR COLUMBUS, MISSISSIPPI SITE. THIS PROJECT IS UNRELATED TO OTHER AREAS CURRENTLY BEING INVESTIGATED BY EPA. THE DEPARTMENT IS ACCEPTING COMMENTS UNTIL JUNE 1, 2001, AND WILL HOLD A PUBLIC HEARING IF SIGNIFICANT INTEREST IS SHOWN. IF YOU HAVE ANY QUESTIONS, CONTACT LOUIS CRAWFORD AT 961-5171.**



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 6, 2001

**FILE COPY**

Ms. Leigh Nichols  
The Columbus *Commercial-Dispatch*  
P. O. Box 511  
Columbus, MS 39703

Dear Ms. Nichols:

Re: Public Notice  
Application for Reissuance  
RCRA Permit No. HW-990-866-329  
Kerr-McGee Chemical, LLC  
Columbus, Lowndes County

Enclosed herewith is a legal notice to be published in your newspaper on April 16, 2001.  
Also, please furnish this office with statement and proof of publication in duplicate.

If there are questions concerning this legal notice, please contact me at 601-961-5117.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Crawford".

Louis Crawford, P.E.  
Environmental Permits Division

Enclosure

cc: Ms. Linda Stanford, OPC (9701)

D22/RCRA/pn-ccd

FILE COPY

Public Notice  
Mississippi Environmental Quality Permit Board  
P. O. Box 10385  
Jackson, Mississippi 39289-0385  
Telephone No. (601) 961-5171  
April 16, 2001

Kerr-McGee Chemical, LLC – Forest Products Division, 2300 14<sup>th</sup> Avenue North in Columbus, Lowndes County, Mississippi, has applied to the Mississippi Department of Environmental Quality for reissuance of the following permit: RCRA Permit HW-990-866-329. The applicant's mailing address is P.O. Box 9310, Columbus, MS 39701. The applicant's operation is the pressure treatment of railroad products including wooden crossties, switch ties, and timbers. The SIC Code is 2491. The proposed permit authorizes and requires the Permittee to conduct Post-Closure Care of closed hazardous waste surface impoundments and to perform corrective action of contaminated groundwater beneath the entire site. These activities are meant to reduce existing contamination and to prevent additional movement of contamination on and near the site. In addition to requiring on-site remediation, this permit requires remediation of a small amount of contaminated groundwater immediately adjacent to the east and to the south of Kerr-McGee property. A second area of possible off-site contamination further to the east along Waterworks Road is currently being investigated by EPA under separate action and is not addressed in this permit. Should future permit modifications be necessary regarding off-site contamination, public comments will be solicited at that time.

Please note that this is not a new permit but is a reissuance of a permit held by Kerr-McGee since 1990. At this time, Kerr-McGee was required to begin remediation of the property. The reissuance of this permit will allow remediation activities to continue.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determination are invited to submit comments in writing to Louis Crawford at the Permit Board's address shown above, no later than June 1, 2001. All comments received by this date will be considered in the formulation of final determination regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit. The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

Additional details about the application, including a copy of the draft permit, are available by writing or calling Louis Crawford at the above Permit Board address and telephone number. This information is also available for review at the following locations during normal business hours:

Mississippi Department of Environmental Quality  
Office of Pollution Control  
Southport Center Building  
2380 Highway 80 West  
Jackson, Mississippi 39204

Columbus Public Library  
314 Seventh Street North  
Columbus, MS 39701

Please bring the foregoing to the attention of persons whom you know will be interested.



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

RECEIVED  
APR 10 2001  
Mississippi Department of Environmental Quality  
Office of Pollution Control

April 6, 2001

Librarian  
Columbus Public Library  
314 Seventh Street North  
Columbus, MS 39701

Dear Librarian:

Re: Public Notice  
Kerr-McGee Chemical, LLC  
Forest Products Division  
Columbus, Lowndes County  
RCRA Permit HW-990-866-329

Enclosed is a copy of the public notice for comment on the above referenced environmental permit. Please post this notice in your library.

Also, enclosed is a copy of information pertinent to the permit. This information should be kept on hand for review by the public until June 1, 2001, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library.

Finally, enclosed please find a duplication of this letter with a place for your signature and the date acknowledging your receipt of the package and your agreement to carry out our request. A self-addressed stamped envelope is enclosed for your convenience.

We are attempting to better keep the public informed of and involved in this Office's actions regarding permitting of new and expanding industry. Since access to the public library is so convenient for so many we hope to use these facilities as often as possible. Your cooperation in this matter is greatly appreciated.

If you have any questions, please let me know at (601) 961-5171.

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

Enclosure

Received and Agreed to By: Susan Namrocki Title: Reference Librarian  
Date: 4-9-2001



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 6, 2001

Columbus Public Library  
314 Seventh Street, North  
Columbus, Mississippi 39701

Dear Librarian:

Re: Eka Chemicals, Inc.  
Lowndes County  
Air Ref No. 1680-00005

Enclosed is a copy of the public notice for comment on the above referenced environmental permit. Please post this notice in your library.

Also, enclosed is a copy of information pertinent to the permit. This information should be kept on hand for review by the public until May 14, 2001, after which it may be discarded. The public may photocopy all or any portion of this information, but it should not leave the library. Finally, enclosed please find a duplication of this letter with a place for your signature and the date acknowledging your receipt of the package and your agreement to carry out our request. A self-addressed stamped envelope is enclosed for your convenience.

We are attempting to better keep the public informed of and involved in this Office's actions regarding permitting of new and expanding industry. Since access to the public library is so convenient for so many we hope to use these facilities as often as possible. Your cooperation in this matter is greatly appreciated.

If you have any questions, please let me know at (601) 961-5171.

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

Enclosure

Received and Agreed to By: Susan Yaworski Title: Reference Librarian  
Date: 4-9-2001

LOWDES CO.  
RCRA  
PERMIT FILE (ORANGE)  
CLH



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**MEMORANDUM**

TO: **Tronox RCRA Permit and HSWA Files-Lowdes County**  
**MSD 990 866 329 (Formerly Kerr-McGee Chemical)**  
FROM: **Larry Hamil**  
SUBJECT: **ATSDR Public Information Session**  
DATE: **November 28, 2006**

On this date the Agency for Toxic Substances and Disease Registry (ATSDR - A public health agency of the US Department of Health and Human Services) and the EPA hosted a public information session at Hunt Intermediate School. Larry Hamil was an observer of the first session conducted from 4 to 6 PM. Ms. Loretta Bush, lead contact of the ATSDR, began the session including introduction of all the participants and the purpose of the session. She categorized the participants as being experts with regard to pollution from wood treatment plants and that they would be sharing information that had been gathered since the last public forum earlier this past summer, as well as responding to questions from the audience. The audience was reminded the purpose of the session was not to address any pending litigation matters or individuals might be involved in against the owners of the closed Tronox site.

Mr. Gregory Zanus, an atmospheric scientist and geophysicist with ATSDR, took the podium and provided explanation of creosote sources, chemical constituents, pathways of exposure, effects of exposure, etc.

Mr. Russ McLean, EPA Region IV, followed Mr. Zanus and provided some history of the site and outlined EPA's oversight of the Tronox site, as well as MDEQ's regulatory oversight. Following Mr. McLean's remarks, the audience began asking questions of him which included the level of contamination in the drainage ditches in the community that have received runoff from the Tronox site over the years, the status of current contamination on the Marantha Faith Center property, the extent of remaining contamination on the Tronox property, questions of a hidden disposal site on the north side of 14<sup>th</sup> Street on wooded property owned by Tronox to which Mr. McLean responded that he had no knowledge of, but did ask the questioner provide more details following the presentation. Mr. McLean was also asked if he would have any reservations of living in the neighborhood from a health and environmental standpoint to which he replied, that he would not if he had any reason to live there. Mr. McLean described the purpose of the groundwater pump and treat system installed on the site and the fact that it would be many years until the groundwater quality is improved to acceptable levels. Explanation was

provided by both Mr. McLean and Mr. Zannus that creosote tends to bind with soil and is not easily separated, thereby only being transferred off the site if erosion occurs transporting sediment off site. Due to the level grade of the site and the fact it is completely covered with gravel, present probability of sediment transport from the site is practically non-existent. Although sediment deposited in the drainage ways in the past may contain creosote constituents, no contamination should be present in the surface water.

Mr. McLean did state that the site surface runoff is monitored and regulated under a storm water permit issued by MDEQ. The fact is that once the facility was closed and all material removed from the site, the storm water permit was revoked as there was no longer any industrial activity performed on the site.

The pastor of the Marantha Faith Center did inquire of Mr. McLean of a report he stated had been promised by MDEQ in 1999 or 2000 addressing a sampling investigation performed by MDEQ on the property of the Faith Center. Mr. McLean reported that a summary of the analytical results had been prepared by MDEQ but he was unaware of any further information beyond that.

In response to a question regarding further assistance from the ATSDR, Mr. Zannus replied that additional "new science" was becoming available that will enable more accurate evaluation of potential wood treating contamination pathways and health effects and that if the consensus of the community is to employ these newer techniques, the ATSDR would do so, which would mean it would be some time before the agency published their final report. However, if the community wants faster results, the report should be finalized by mid to late summer, 2007.

The session was well organized and all participants were amicable throughout.





Brad Mayo/ERC/Admin/DEQ

To

cc

bcc Larry Hamill/ECED/OPC/DEQ

Subject MDEQ News for 11.30.06

11/30/2006 11:10 AM

SUN HERALD (Biloxi)

Last public water meeting to be held tonight

The third and final public meeting to discuss the Mississippi Gulf Region Water and Wastewater Plan will be held tonight at the Coast Electric building.

A reception and question period will begin at 5:30 p.m. The formal presentation of the plan begins at 7 p.m. Public comments will be taken during this time.

Meetings this week have allowed residents to view the master plan that will determine the distribution of \$500 million in community-development grants to pay for water, wastewater and storm-water infrastructure projects in five coastal counties.

Jackson, Harrison, Hancock, Stone and Pearl River counties are participating in the program, but George County has opted out of the plan directed by the state Department of Environmental Quality and Gov. Haley Barbour.

Commercial Dispatch (Columbus)

Officials: Danger of local creosote contamination diminished

Government scientists told Columbus citizens Tuesday while contamination from creosote and other chemicals used in wood treatment at the old Kerr-McGee plant still exists, the dangers to humans are not as great as they were while the plant was operational.

Hundreds of people turned out to Hunt Intermediate School to hear updates from government officials from the Agency for Toxic Substances and Disease Registry and the Environmental Protection Agency deliver an update about the creosote contamination situation at the old wood treatment plant on 14th Avenue North.

Residents asked questions about the safety of their houses and yards and the scientists gave people the latest updates in the ongoing public health assessment the ATSDR is conducting.

Greg Zarus, an atmospheric scientist and geophysicist, said new science has recently revealed that humans are more susceptible to airborne contamination from creosote and other chemicals used in treating lumber products like the railroad ties which were made at the old Kerr-McGee plant.

"Chemicals that get in through the air get in a lot faster than we previously thought," Zarus said. "...And we found that women and children have a unique sensitivity to the airborne chemicals."

Zarus said the ATSDR would continue to evaluate soils, sediment and water exposures to creosote and, once finished, tell the people of Columbus about their findings.

"I understand some of you are coming in on the latter part of this, and I don't want to sound like a broken record," said Connie Sharma, who lives on 26th Street North, to government representatives. "We here have survived this, but a lot of our children have died from cancers. It's still here."

Zarus said that many chemicals go into creosote, but the most harmful of those tend to stay underground once they get there. While rains may still bring a lot of oily chemicals to the surface and the smell of creosote may return, Zarus said, the most harmful compounds aren't usually exposed, especially since the plant closed in 2003. But he warned to use common sense when dealing with suspicious substances.

"A lot of people seem to be very concerned about living in this area," Zarus said. "If you've got sticky stuff in your yard, I wouldn't want my kids playing in it. ... You really can tell when it's bad. If there's sticky stuff around, that's what you should be most concerned with."

EPA Environmental Engineer Russ McClain gave a background of his agency's involvement at the site, including its role in cleanup.

"We at the EPA handled the cleanup of this facility," McClain said. "The state (MDEQ) is responsible for maintaining the closed impoundments and operating the groundwater cleanup program."

"The EPA is looking at current exposures," McClain said. "We are well aware exposure from this facility was probably a lot worse 30 to 40 years ago than it is now."

McClain fielded questions about the level of contamination found around the plant and how contamination affects



the community still.  
"How can we make it safe for our children?" asked Lenward Johnson.  
"As far as children playing in those ditches, I would not be concerned about creosote levels," McClain said. "But I would be concerned about a lot of other things in those ditches, like broken glass. It's not a pretty area in a lot of those ditches."  
Many residents expressed concern over child safety, saying they grew up playing in or near areas where creosote existed. The scientists were also asked about creosote found under a culvert near Propst Park recently during construction around the culvert.

"The Propst Park contamination was at depth," McClain said. "Most of the contamination we have found is at depth. It's not right at the surface."  
McClain said creosote constituents deep in the soil do not usually get exposed to humans once they get in the ground.  
The Rev. Steve Jamison, pastor of Maranatha Faith Center, which is embroiled in litigation against Tronox, the spinoff company that owns the site where the plant used to be and operates all of Kerr-McGee's old chemical division, said there was still creosote under the new culvert built at Maranatha.  
"That particular creosote should not be a problem," McClain said. "There should not be exposure to it."  
After Zarus and McClain spoke and answered questions, audience members had an opportunity to talk one-on-one with ATSDR and EPA representatives. Some asked the EPA to test their yards for contamination. Others told of their health problems.  
"We heard some of the same complaints, and we heard some new ones," said ATSDR Regional Representative Carl Blair. "We're going to address them all. It was good to have the EPA here this time. They can address contamination in people's yards, and can test yards if they feel it's justified."  
Tuesday's meetings were the second set held by the ATSDR in Columbus. The agency will come back with more information once its public health assessment is complete.

#### CLARION LEDGER

**Crews clean diesel spill to reopen I-20W** (Web Update from Wednesday evening)  
Westbound lanes of I-20 near the Terry Road exit in Jackson were reopened to traffic about 3 p.m. after crews cleaned a diesel spill from an 18-wheeler accident.  
The truck's driver, Dave Edmister of Lexington, N.C., said he had slowed at the scene of another accident and attempted to pull around a pick-up in front of him.  
But Edmister failed to see that the smaller truck was pulling a small flat-bed trailer, he said, and he scraped it with his truck, puncturing a 150-gallon fuel tank.  
The spill caused delays for nearly three hours. Sand remains on the roadway.  
MDOT cautions motorists to travel through the area with caution.

**MDEQ officials deny approving burial of demolished building**  
(This was picked up from Wed. 's Mississippi Press and appears to be on the AP Wire.)  
Officials with the Mississippi Department of Environmental Quality denied approving the onsite burial of a building damaged by Hurricane Katrina.  
A demolition crew tore down the Main Street building on Nov. 15 and piled debris into a mound. Instead of hauling it off, the workers pushed the debris into a hole dug on the property, upsetting local leaders.  
Moss Point city leaders believed that MDEQ officials approved the burial, an assertion the director of solid waste policy and planning denies. Mark Williams said state inspectors did not see the site until after the burial.  
"We did not know about the burial on site," Williams said. "We do not encourage that."  
Mayor Xavier Bishop said he believes officials gave "implied consent" by not condemning the practice. The city's environmental court had previously ordered the building destroyed after people were found living in it.  
Bishop said when MDEQ was in contact with city building inspector Thomas Franklin it condoned the building burial. He said the agency should have explicitly condemned the practice because it gave city officials the impression that it approved the burial.  
Chad Seymour, an environmental scientist with MDEQ, said he met with Franklin the Monday after the process and was not aware of it before then.  
"Me and Mr. Franklin met because he had called it in as a complaint," Seymour said.



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 18, 2006

CERTIFIED MAIL 70041160000341735183

Mr. Stephen Ladner

Tronox LLC, Columbus

PO Box 268859

Oklahoma City, OK 7312-68859

Dear Mr. Ladner:

Re: Tronox LLC, Columbus

Lowndes County

MSP090021 & HW-990866329

The Environmental Permits Division has approved the transfer of all currently valid permits and permit coverages for the referenced facility from Kerr McGee Chemical LLC to Tronox LLC. Please replace the first page of the above referenced permits with the enclosed modified pages. Note the limitations, schedules of compliance, monitoring requirements, and monitoring reporting dates found in these permits are still applicable.

If you have any questions, please call me at (601) 961-5096.

Sincerely,

Toby M. Cook, P.E.

Environmental Permits Division

Enclosures

cc: Rick Sumrall

1696 PER20050002

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 10385 • JACKSON, MISSISSIPPI 39289-0385 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

**State of Mississippi  
Hazardous Waste Management  
Permit**

**THIS CERTIFIES THAT**

**TRONOX LLC  
COLUMBUS, LOWNDES COUNTY  
I.D. NO. MSD 990 866 329**

is hereby authorized to perform post-closure care of a closed surface impoundment area, to perform corrective action of contaminated groundwater beneath the site, and to conduct compliance monitoring of groundwater beneath the area.

This permit is issued under the authority of the Mississippi Solid Wastes Disposal Law, and particularly Section 17-17-27 thereof, and rules adopted and promulgated thereunder, all of which authorize the Department of Environmental Quality to enforce all applicable requirements under the Mississippi Hazardous Waste Management Regulations, and associated conditions included therein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

**CHIEF, ENVIRONMENTAL PERMITS DIVISION**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issuance Date: June 11, 2001**

**Modified : APR 13 2006**

**(Name Change)  
Expiration Date: May 31, 2011**

**Permit No: HW-990-866-329**

ENTERED BY *SL*

PERMIT BOARD REPORT

MAY 09 2006

Permit Action Form  
Tronox LLC, Columbus  
2300 14th Avenue North  
Lowndes County  
Columbus, MS 39701

Branch Manager: Toby Cook  
SIC: 2491

### Recommendations

Folder No. - Activity Type  
PER20050002 - MA-Water-PT-ADMIN  
PER200000005 - RA-HW-TSD  
Action: ☐ Issue ☒ Modification ☒ Transfer ☐ Revoke  
☐ Reissue ☐ Name Change ☐ Deny

Permit No. MSP090021  
HW990866329  
By: ☒ Division Chief  
☐ Permit Board  
☐ Terminate  
DEQ Contact  
Toby Cook  
Toby Cook

### Programs:

Program	Sub Program	Start Date	End Date	Delete
Air	NSPS Subpart Dc	09/12/1990	06/01/2002	<input checked="" type="checkbox"/>
Hazardous Waste	TSD - Not Classified	06/11/2001		<input type="checkbox"/>
Water	PT NCS	09/01/2003		<input type="checkbox"/>
Water	PT SIU	10/11/1994		<input type="checkbox"/>

Marked subprograms should be deleted from the master file by the Master File Administrator

Program	Sub Program	Start Date	End Date
Air	NSPS Subpart Dc	09/12/1990	06/01/2002
Hazardous Waste	TSD - Not Classified	06/11/2001	
Water	PT NCS	09/01/2003	
Water	PT SIU	10/11/1994	

### Air Use Only:

- ☐ Emissions data entered in enSite
- ☐ Emissions data prepared using Lotus 1-2-3 (Attached)
- ☐ Permitting action did not change emissions inventory.

### TMDL Use Only:

'Y' indicates conformance with published TMDLs, 'N' indicates non-conformance.

Published TMDL	FLAG	%:tmdl attribute%
		%:NEXXT%

Basis: Name change from Kerr McGee Chemical LLC to Tronox LLC.

### Coordination

Comments: None

1696 Water PER20050002

*CAS*

## Relationships

People

Name	Address	City	State	Zip	Relationship
Stephen Ladner	PO Box 268859	Oklahoma City	OK	731268859	Is Water Permit Contact
Nick Bock	PO Box 268859	Oklahoma City	OK	731268859	Is Contact For
Patrick Corbett	PO Box 268859	Oklohomia City	OK	731268859	Is Application Signatory for
Stephen Ladner	PO Box 268859	Oklahoma City	OK	731268859	is DMR recipient for

## Administrative Tasks

Task	Scheduled Date	Completed Date
Name Change / Transfer Request Received		12/29/05 11:10:51 AM
Send Name Change / Transfer Approval Letter	1/8/06	
Issue Permit	1/8/06	4/13/06
Received Revised Name/Transfer Form Request		4/10/06 1:36:55 PM

## Existing Permits

Permit Number	Description
Air-Construction	168000020
Water-Pretreatment	MSP090021
GP-Wood Treating	MSR220010
Hazardous Waste-TSD	MSD990866329
Hazardous Waste-EPA ID	MSD990866329

## Requirement Profiles:

Category	ID	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6	Level 7	Level 8
AI	1696	Permit Shell	Individual Permit	Water	Pretreatment				
RPNP	1	Permit Shell	Individual Permit	Water	Pretreatment				

# 1696

RECEIVED  
APR 10 2006  
Dept of Environmental Quality  
Office of Pollution Control

March 8, 2006

**TRONOX**

Mr. Toby Cook  
Mississippi DEQ  
Office of Pollution Control  
PO Box 10385  
Jackson, Mississippi 39289

Re: Ownership Change  
Hazardous Waste Permit - HW 90-329-01  
Wastewater Permit - Permit No. MSP090021  
Kerr-McGee Chemical LLC  
Columbus, Mississippi

Dear Mr. Cook:

Please find enclosed the completed forms for a request of change of ownership for the Kerr-McGee Chemical LLC site in Columbus, Mississippi. Kerr-McGee has elected to separate the chemical business from the main business. The new business is called Tronox LLC.

The forms cover both the Hazardous Waste Management Permit, HW 90-329-01 and the Wastewater discharge permit, MSP090021 for the facility.

Thank you for your time and consideration in this matter. Please feel free to contact me, Steve Ladner at (405) 775 - 5129.

Sincerely,

TRONOX LLC  
*Stephen A. Ladner*  
Stephen A. Ladner  
Project Manager

Cc: Dickie Allison  
Larry Hammil, Miss DEQ

Tronox LLC

123 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102 • P.O. Box 268859, Oklahoma City, Oklahoma 73126-8859

# Environmental Permits for Industrial Facilities

Instructions: For Ownership Change-Complete all items on Page 1 (except Item VIII) and Page 2 (reverse side). For Name Change Only-Complete Items I, II, V, VI, VII, VIII, and Page 2 (reverse side). Note-This form should be submitted to MDEQ when a transferal date is finalized but prior to the actual transfer.

<p>Item I.</p> <p>Facility Name: <u>Kerr-McGee Chemical LLC</u></p> <p>Location: (Do Not Use P.O. Box) <u>2300 14th Ave</u></p> <p>City: <u>Columbus</u> State: <u>MS</u> Zip: <u>39701</u></p> <p>County: <u>Lauderdale</u></p> <p>Telephone: ( )</p>	<p>Item II.</p> <p>Responsible official after transfer or name change:</p> <p>Name: <u>Pat Corbett</u></p> <p>Title: <u>Vice President - SEA</u></p> <p>Mailing Address: <u>Street/P.O. Box: 268859</u></p> <p>City: <u>Oklahoma City</u> State: <u>OK</u> Zip: <u>73126-8859</u></p> <p>Telephone: (405) <u>775-5474</u></p>
<p>Item III.</p> <p>Previous Permittee: <u>Kerr-McGee Chemical LLC</u></p> <p>Mailing Address: <u>Street/P.O. Box: 123 Robert S. Kerr</u></p> <p>City: <u>Oklahoma City</u> State: <u>OK</u> Zip: <u>73126-8859</u></p> <p>Telephone: (405) <u>270-1313</u></p>	<p>Item IV.</p> <p>New Permittee: <u>Trinox LLC</u></p> <p>Mailing Address: <u>Street/P.O. Box: 268859</u></p> <p>City: <u>Oklahoma City</u> State: <u>OK</u> Zip: <u>73126-8859</u></p> <p>Telephone: (405) <u>775-5129</u></p>
<p>Item V.</p> <p>Industrial Activity: <u>closed 2491</u></p> <p>Brief Description: <u>former wood treating site</u></p> <p>Undergoing Remediation</p>	<p>Item VI.</p> <p>Will Facility Operations Change? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, the appropriate applications and permits may require modification prior to change.</p>
<p>Item VII.</p> <p>Will Facility Name Change? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If Yes, Provide New Name for Permit Coverage.</p> <p>New Name: <u>Trinox LLC</u></p>	<p>Item VIII.</p> <p>Signature for Name Change: <u>Patrick S. Corbett</u></p> <p>Print Name: <u>Patrick S. Corbett</u></p> <p>Authorized Signature: <u>Patrick S. Corbett</u></p> <p>Title: <u>VP - SEA</u></p> <p>Date: <u>3/31/2006</u></p>
<p>Item IX.</p> <p>We the undersigned request transfer of permit(s) and/or permit coverage(s) listed on the backside of this form.</p> <p>From: <u>Kerr-McGee Chemical LLC</u></p> <p>To: <u>Trinox LLC</u></p> <p>Acquisition Date: <u>3/31/2006</u></p> <p>By signature below, the recipient certifies that: 1) they are aware of the requirements of the permit(s), 2) the applicant can demonstrate to the Permit Board it has the financial resources and operational expertise and 3) agrees to accept responsibility and liability for the permit(s) listed on the back of this document. By signature below, the previous permittee is requesting that the permit(s) and/or permit coverage(s) be transferred to the recipient. The transfer of the permit(s) or permit coverage(s) will be by written notification from the Office of Pollution Control (OPC). The OPC may require submission of information regarding financial capability and past compliance history of the recipient.</p> <p>Print New Permittee Name: <u>Trinox LLC</u></p> <p>New Authorized Signature: <u>Patrick S. Corbett</u></p> <p>Print Previous Permittee Name: <u>Kerr-McGee Chemical LLC</u></p> <p>Previous Authorized Signature: <u>Pat Corbett</u></p> <p>Title: <u>Director of Env. Remediation</u></p> <p>Date: <u>4/5/2006</u></p>	

Mississippi Department of Environmental Quality/Office of Pollution Control  
P.O. Box 10385  
Jackson, Mississippi 39289-0385  
(601) 961-5171

<p>Item X. Storm Water</p> <p>(Check One)</p> <p><input checked="" type="checkbox"/> A Storm Water Pollution Prevention Plan (SWPPP) is not required for the site.</p> <p><input type="checkbox"/> The recipient certifies that they have received a copy of the Office of Pollution Control approved SWPPP from the original owner.</p> <p><input type="checkbox"/> The recipient is submitting a new SWPPP, which is attached to this form.</p> <p><input type="checkbox"/> A copy of the SWPPP cannot be obtained from the original owner.</p>		<p>Item XI. Hazardous Waste ID Number</p> <p>EPA ID No. <u>MSD 990 866 329</u></p> <p>(Check One)</p> <p><input type="checkbox"/> An EPA Hazardous Waste ID Number is not required for the site.</p> <p><input checked="" type="checkbox"/> The site's EPA ID Number is listed above and a Notification of Regulated Waste Activity Form is attached.</p>	
<p>Item XII. Permit(s) and/or Coverage(s) to be Transferred</p>		<p>Permit Type: <u>Hazardous Waste Manifest</u></p> <p>Permit/Coverage No.: <u>HW 90-329-01</u></p> <p>Permit Issuance Date: <u>9/11/2000</u></p> <p>Date of General Permit Coverage: _____</p> <p>Permit Expiration Date: <u>9/11/2010</u></p>	
<p>Permit Type: _____</p> <p>Permit/Coverage No.: _____</p> <p>Permit Issuance Date: _____</p> <p>Date of General Permit Coverage: _____</p> <p>Permit Expiration Date: _____</p>		<p>Permit Type: <u>Wastewater</u></p> <p>Permit/Coverage No.: <u>MSD 090001</u></p> <p>Permit Issuance Date: <u>10/31/2005</u></p> <p>Date of General Permit Coverage: _____</p> <p>Permit Expiration Date: <u>10/30/2010</u></p>	
<p>Permit Type: _____</p> <p>Permit/Coverage No.: _____</p> <p>Permit Issuance Date: _____</p> <p>Date of General Permit Coverage: _____</p> <p>Permit Expiration Date: _____</p>		<p>Permit Type: _____</p> <p>Permit/Coverage No.: _____</p> <p>Permit Issuance Date: _____</p> <p>Date of General Permit Coverage: _____</p> <p>Permit Expiration Date: _____</p>	
<p>OTHER INFORMATION:</p>		<p>Permit Type: _____</p> <p>Permit/Coverage No.: _____</p> <p>Permit Issuance Date: _____</p> <p>Date of General Permit Coverage: _____</p> <p>Permit Expiration Date: _____</p>	



Revised  
(Formerly Kerr-McBee)  
RCA  
Permitting (Orange)  
CLH



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

April 12, 2006

Mr. Steve Ladner  
Project Manager  
Tronox LLC  
P.O. Box 268859  
Oklahoma City, OK 73126-8859  
Dear Mr. Ladner:

Re:

Permit No. MSD 990 866 329

Columbus Site  
Notification of AOC

Your written notification of April 5, 2006 reporting the discovery of an AOC on the referenced site has been received. As there is no evidence this discovery is other than an AOC, all applicable conditions specified in Module VI.B. of the permit have been satisfied.

As much advance notice possible of the tank recovery is requested, once a date is finalized. Continue to advise our office as circumstances may warrant.

Sincerely,

Larry Hamill

MDEQ-OPC

Environmental Compliance & Enforcement Division

OFFICE OF POLLUTION CONTROL

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FILE COPY

LOWDES Co.  
RCRA  
Permit File (locust)  
CLH

Name: Steve Ladner  
Title: Project Manager

**TRONOX**

Phone: 405 775-5129  
Fax  
e-mail: Steve.Ladner@Tronox.com

April 5, 2006



Executive Director  
Mississippi Department of Environmental Quality  
P.O. Box 10385  
Jackson, MS 39289-0385

Re: Newly Identified Area of Concern  
Former Kerr-McGee Chemical LLC Site  
Columbus, MS  
Permit No: MSD 990866329

Dear Executive Director:

On March 24, 2006, site personnel at the former Kerr-McGee Chemical LLC site in Columbus, MS discovered at old riveted tank in an area north of the site. The tank was in a wooded area owned by the former Kerr-McGee Chemical LLC group now Tronox. The wooded area has not been used for the production processes associated with this site. The discovery was reported to Larry Hammil, MDEQ, on March 24, 2006 via a telephone conversation.

This correspondence serves as the notification letter in compliance with Permit Condition, VI.B, Notification and Assessment Requirements for Newly Identified SWMUs and AOC's. The requirement is for fifteen day written notification of the discovery of an AOC. Since there has been no release, it is an AOC.

In accordance with Permit Condition, VI.B.1, the notification shall include at a minimum, the location of the SWMU and/or AOC and all available information pertaining to the nature of the release.

The tank is located in a wooded area north of the pole yard at the site. The tank is a riveted tank, indicating pre-World War II, and measures approximately 14 feet in length with a diameter of 3 to 4 feet. There is no apparent release from the material in the tank which has the appearance of a hard asphalt with no viscosity. The tank is surrounded by pine trees and is located in a wet area.

As per the conversation with Mr. Hammil, the approach will be to drag the tank out with a bulldozer when the ground is drier in the later part of the spring, probably May. Tronox will then notify the agency for an inspection.


Tronox LLC

123 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102 • P.O. Box 268859, Oklahoma City, Oklahoma 73126-8859

Executive Director  
April 5, 2006  
Page 2

Thank you for your time and consideration in this matter, please feel free to contact me, Steve  
Ladner at (405) 775-5129 if you have any further questions.

Sincerely,

On behalf of the former Kerr-McGee Chemical LLC Site  
Current Tronox LLC  
  
Stephen A. Ladner  
Project Manager

cc: Don Shandy, Tronox  
Nick Bock, Tronox  
Dicky Allison, Tronox

LOWNDES Co.  
WATER HAZ. WASTES  
TREATMENT TSD (ORANGE)  
MSD090021 MSD990 866 329  
CLH

KERR-McGEE CHEMICAL LLC  
KERR-McGEE CENTER • P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

October 6, 2005

Mr. Larry Hammil  
Mississippi DEQ  
P.O. Box 10385  
Jackson, MS 39289

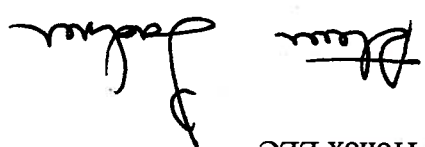
Re: Name Change Of Kerr-McGee Chemical LLC To Tronox LLC

Dear Mr. Hammil:

This is to inform you that on September 12, 2005, Kerr McGee Chemical LLC's name was changed to Tronox LLC. Should you have any questions, please contact Steve Ladhner at (405) 270-2625.

Sincerely,

On Behalf of  
Tronox LLC



Steve Ladhner  
Project Manager



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

July 15, 2005

Mr. Stephen Ladner  
Kerr McGee Chemical Corporation, Columbus  
PO Box 25861  
Oklahoma City, OK 73125

Dear Mr. Ladner:

Re: Kerr McGee Chemical Corporation, Columbus  
Lowndes County  
Haz. Waste Ref. No. MSD990866329

We have reviewed your letter of May 9, 2005 regarding proposed changes to the groundwater monitoring system at Columbus, and have the following comments:

1. We have no objection to the proposal to plug and abandon wells CMW62 and CMW63, and piezometers P1 through P5.
2. We have no objection to replacing total phenols on the constituent monitoring list with specific constituents pentachlorophenol and 2,4-dimethylphenol. However, such a change would appear to be a class 2 permit modification, which requires that Kerr McGee submit a class 2 modification request and follow the required procedures described in MHWMR 270.42.
3. We have no objection to the reclassification of well CMW 16 as an upgradient well. This also appears to be a Class 2 modification.
4. We are in agreement with the addition of wells CMW31 through CMW37 to the permit, and changing the designation of CMW29. Kerr McGee should follow the Class 2 modification procedures in order to make the requested changes to the permit.

If you have any questions, please contact me at (601) 961-5067.

Sincerely,

Toby M. Cook, P.E.

Environmental Permits Division

cc: Russ McLean

1696 PER20000005

Misc Letter to HW Contact

OFFICE OF POLLUTION CONTROL

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Permitting File (orange)

Mr. Toby M. Cook, P.E.  
Environmental Permits Division  
Office of Pollution Control  
2380 Highway 80 West  
Jackson, Mississippi 39204

Re: Kerr-McGee Chemical LLC - Columbus Mississippi Facility  
Proposed Monitor Well Plugging / Permit Modification Program

Dear Mr. Cook:

Over the past several months, Kerr-McGee Chemical LLC (KMCLLC) has conducted an in-depth study of the monitor well / piezometer system and the Post-Closure Permit conditions at the closed Columbus, MS wood treating facility and would like to propose the following monitor well / piezometer network and permit modifications.

#### MONITOR WELL / PIEZOMETER NETWORK MODIFICATIONS

Two monitor wells, CMW62 and CMW63 (see attached figure) are on school property southwest of the facility. These wells are used for water levels only and are not permitted sampling wells. The school has recently begun converting the well site area from a running track into an outdoor nature / conservation / greenhouse classroom setting. The wells are not critical for the water level evaluation of the facility, and are becoming increasingly difficult to access. KMCLLC proposes plugging and abandoning these wells.

Piezometers P1 through P5 are 1-inch diameter piezometers which were originally installed adjacent to recovery wells RW3 through RW7 to monitor drawdown water levels. Since the time of the recovery well - piezometer installation, trenches 1 and 1A have been installed and over time have successfully intercepted a large area of groundwater flow. This area of groundwater interception has now reached far enough to interact with the recovery well network. For this reason, piezometers P1 through P5 are no longer necessary to monitor water levels. These piezometers are not utilized in the Permit. KMCLLC proposes to plug and abandon piezometers P1 through P5.

#### PERMIT MODIFICATIONS

The total phenols analysis, method SW-846 9066, is a generalized analysis that is fairly accurate and reproducible in low concentration samples. However, the analytical method is not constituent-specific and in KMCLLC's experience, often produces false positive results in wells that are otherwise determined to be non-detect for K001 compounds through constituent-specific 8270 analyses. KMCLLC believes that the current method 8270 analysis of K001 acid and base / neutral cresote compounds supplies more accurate, constituent-specific data which is not enhanced by the addition of a generalized total phenols analysis. KMCLLC proposes to discontinue the total phenols analysis for groundwater samples.

May 9, 2005

RECEIVED  
JUN 16 2005  
Office of Environmental Quality  
Office of Pollution Control

Monitor wells CMW16 (alluvium) and CME3 (Eutaw formation) are in upgradient positions in the northwest portion of the facility. KMCLLC proposes to designate well CMW16 as an additional upgradient well instead of its current designation as a boundary well. Monitor well CME3 would be designated as the upgradient well for the deep monitoring zone (Eutaw). Both wells would shift from a semi-annual to annual sampling schedule.

Seven groundwater monitor wells (CMW31 through CMW37) have been installed at the facility since issuance of the most recent RCRA Permit. These wells have not been formally added to the permit. Well CMW31 contains free product and is currently pumped on a periodic basis for free product removal. Wells CMW32 through CMW37 were installed as in the vicinity of CMW31 to determine the extent of creosote impact in the northeastern portion of the facility. Wells CMW32 through CMW37 are currently sampled as Boundary wells as defined in the Permit. KMCLLC proposes to designate wells CMW32 and CMW36 as Effectiveness wells to monitor the remediation progress in well CMW31. In addition, KMCLLC proposes to change well CMW29 (adjacent to CMW31) from a Boundary well to an Effectiveness well. The remaining new wells, CMW33, CMW34, CMW35, and CMW37, are proposed as Boundary wells in this area of the facility.

If you have any questions concerning these modifications do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-MCGEE CHEMICAL LLC.



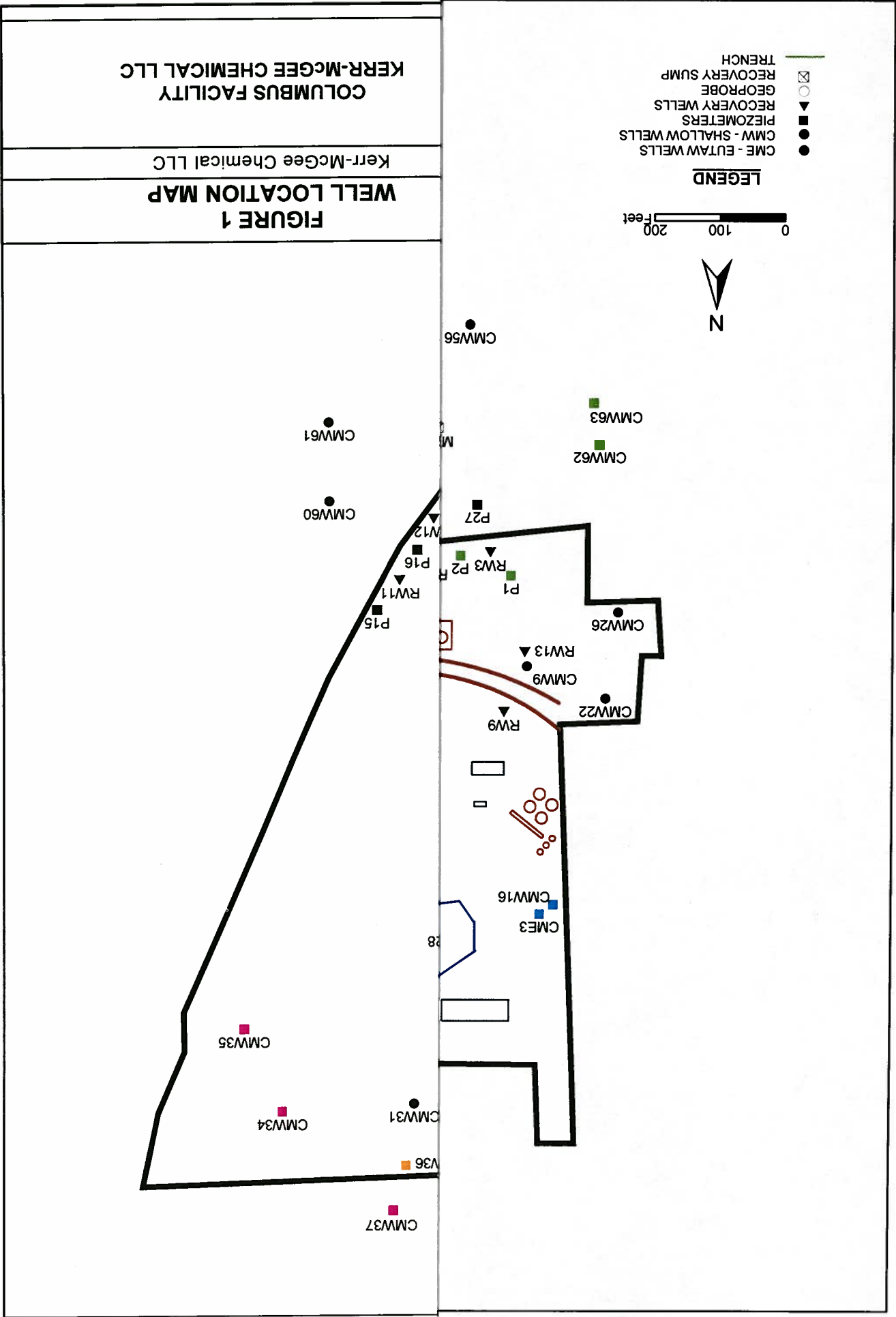
STEPHEN A. LADNER

Staff Environmental Specialist

SL/TWR

Attachment

cc: Mr. Russ McClean, USEPA - Region IV  
T. Reed







"Ladner, Steve"

<Sladner@kmg.com>

11/16/2004 06:25 AM

To: <McLean.Russ@epamail.epa.gov>, <Larry\_Hamill@deq.state.ms.us>  
cc: "Christiansen, John Michael" <JChristiansen@kmg.com>, "Cubbage, T  
L" <TCubbage@kmg.com>  
Subject: FW: Columbus Project Update - November 11, 2004

Russ and Larry,

Just an update on Columbus, all work completed and no media issues or  
community issues during field work. Report will follow, call if you  
need anything,

Steve

-----Original Message-----

From: Chuck.Harrell@kmg.com [mailto:Chuck.Harrell@kmg.com]  
Sent: Thursday, November 11, 2004 7:44 PM

To: Ladner, Steve

Cc: Barrett.Cleut@kmg.com; Bock, Nick; Robert.Coffman@kmg.com;

Raj.Vadlamudi@kmg.com; Hamilton, John

Subject: Columbus Project Update - November 11, 2004

Steve,

Field work has been completed. Work completed today included:

Remaining truck mats were deconned and picked up from the site  
Regraded Area 4 between ditch and BNSF tracks  
Removed C&G crossing (2 tracks)  
Removed KMC crossing (4 tracks)  
Excess fill material used to fill low area on KMC property  
Regraded temporary access road from 14th Avenue to Area 3 to address  
ponded water  
Removed temporary culvert in Area 3  
General site cleanup and demobilization

Construction equipment will be picked up tomorrow. Remediation work has  
been completed with 0 health and safety incidents. Congratulations and  
thanks to all involved for a job well done.

If you have any questions or require any additional information, don't  
hesitate to give me a call.

Thanks,

Chuck

Permit 171C  
Orange label



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

August 23, 2004

Mr. Stephen O. Ladner  
Kerr McGee Chemical LLC  
PO Box 25861  
Oklahoma City, Oklahoma 73125

Dear Mr. Ladner:

Re: Kerr McGee Chemical Corporation, Columbus  
Lowndes County  
Haz. Waste Ref. No. MSD990866329

We have reviewed the response to our comments on the proposed groundwater assessment at the Columbus facility. We have no further questions and approval of the work plan is hereby granted. If you have any questions, please contact me at (601) 961-5067.

Sincerely,

A handwritten signature in cursive script, appearing to read "Toby M. Cook".

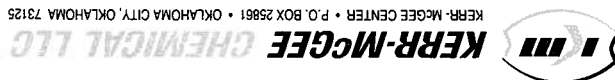
Toby M. Cook, P.E.

Environmental Permits Division

1696 PER200000005

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 10385 • JACKSON, MISSISSIPPI 39289-0385 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us  
AN EQUAL OPPORTUNITY EMPLOYER



RECEIVED  
AUG 23 2004  
Office of Pollution Control  
Mississippi Department of Environmental Quality

July 20, 2004

Mr. Toby M. Cook, P.E.

Environmental Permits Division

Office of Pollution Control

Mississippi Department of Environmental Quality

P.O. Box 10385

Jackson, Mississippi 39289 - 0385

Re: Kerr-McGee Chemical LLC - Forest Products Division (KMCLLC-FPD)

Columbus Mississippi Facility

Response to July 7, 2004 Correspondence from MDEQ

Dear Mr. Cook:

KMCLLC-FPD has received your correspondence dated July 7, 2004 requesting additional information in regard to the proposed groundwater assessment at our closed Columbus facility. We have reviewed your comments and offer the following explanations. The MDEQ comments are italicized for clarity.

1. Explain how the groundwater samples will be obtained with the geoprobe methodology, screen to be used, purging, etc.

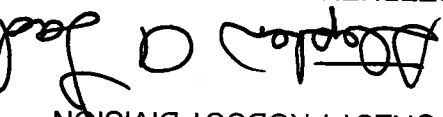
1. The Geoprobe process will involve the "pushing" of two separate sample locations. The first sample location is utilized for soil sampling where the Geoprobe tool is set up to collect continuous soil samples. Soil lithology logs are prepared and visual / olfactory evidence is also noted in the soil samples. Following removal and decon of the tool system, another sample location is "pushed" immediately adjacent to the soil sampling location. For this location, the Geoprobe tool has been fitted with a stainless steel screened section which can be exposed to the formation when the appropriate depth has been reached. In this case, we will push down below the water table to a point two feet above the top of the Eutaw formation. At that point, the screened section is exposed to the formation. Disposable Teflon tubing is lowered into the tool and a peristaltic pump is used to lift water from the screened section to the surface. The sample location is pumped until the water is free of suspended sediment. Again, water color and olfactory observations are made during the water sample collections.

Please note that these water samples represent grab samples for groundwater impact reconnaissance. The analytical results will be used to location permanent groundwater monitoring well(s) at a later date.

2. Will some type of field screening equipment be used, and if so, explain.
2. We will not incorporate any field screening equipment for this investigation. Over many years of creosote soil and groundwater assessments, we have not found a reliable field screening method that is of greater benefit than visual and olfactory inspections of soil and water samples.
3. If any of the initial locations prove to be "hot", what will the lateral spacing be for the next boring?
- We successfully used a 100-foot spacing for groundwater reconnaissance locations during the past assessment onsite south of 14<sup>th</sup> street. We expect to use this same spacing for potential step-out locations to the north, west, and/or east.

If you have any questions concerning these responses, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-MCGEE CHEMICAL CORP.  
FOREST PRODUCT DIVISION  
  
STEPHEN A. LADNER  
Staff Environmental Specialist

SL/twr  
Attachment  
cc: Mr. Russ McClean, USEPA - Region IV  
T. Reed

FILE COPY



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

September 15, 2004

Mr. Steve Ladner  
Project Manager

Kerr-McGee Chemical, LLC

P.O. Box 25861

Oklahoma City, OK 73125

Dear Mr. Ladner:

Re:

Waste Classification

Off-site Surface Drainage Excavation

Columbus, MS Site

EPA ID # MSD 990 866 329

In response to your letter received in our office August 3, 2004, we concur with the company's determination of the classification for the soil that will be excavated from the drainage conveyances off-site and leading from the referenced site. Management of this material shall be in accordance with the measures described in the aforementioned correspondence. However, should any free product or creosote saturated soils be discovered during performance of this approved corrective action, MDEQ would require any material of this description be recycled as commercial product, or otherwise classified and managed as hazardous waste.

Based upon the joint site visit with EPA on September 14, 2004 to review and discuss the plan, the project appears to be well organized and thoroughly prepared for the September 27, 2004 commencement. A site visit is presently planned during the first week of October to observe activities in progress at that time.

Please contact me at 601-961-5123, as circumstance warrant.

Sincerely,

Larry Hamill

Environmental Compliance & Enforcement Division

cc:

Mr. Russ McClean, EPA-Region IV

Mr. Toby Cook, MDEQ

Mr. Jerry Banks, MDEQ

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 10385 • JACKSON, MISSISSIPPI 39289-0385 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us  
AN EQUAL OPPORTUNITY EMPLOYER

- The agency has advanced the decision that impacted materials from off-site locations are not appropriately classified as listed hazardous wastes.
- Even with this interpretation, KMC LLC would not be sending this to any other facility than a secured, hazardous waste facility.
- KMC LLC proposal was to handle any materials from excavation "as if" they were hazardous, including a hazardous waste hauler, manifest system, and disposal at a RCRA landfill, but the waste itself would not be classified as hazardous.

The purpose of this correspondence is to determine the waste classification for any excavated material from these surface water drainage ditches. I have enclosed correspondence from KMC LLC to Jerry Banks in 2002 pertaining to a similar site in Hattiesburg, Mississippi outlining discussions of waste classifications for this type of material. The correspondence outlines the following points:

As per our conversation this morning, Kerr-McGee Chemical LLC (KMC LLC) will be performing voluntary corrective measures in an area of surface drainage located off-site of the plant. These measures were presented to and approved by Russ McLean, USEPA Region IV. It is KMC LLC's intention to perform this work in September, 2004. As we discussed, a site meeting or teleconference will be accomplished prior to any startup of work related to this task.

Dear Mr. Hammil and Mr. McLean:

Kerr-McGee Chemical LLC  
Columbus, Mississippi  
EPA ID Number MSD 990 866 329

Re: Waste Classification

Mr. Larry Hammil  
Mississippi DEQ  
Office of Pollution Control  
PO Box 10385  
Jackson, Mississippi 39289

Mr. Russ McLean  
Project Manager  
US EPA Region IV  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

July 8, 2004



Mr Larry Hammil and Mr. Russ McLean  
July 8, 2004  
Page 2

- EPA supports this decision to extend the interpretation to these conditions through the following documentation:

"It has been the Agency's longstanding policy that in cases where the origin of the contaminants is unknown, the lead agency may assume that contaminants in media did not originate from listed hazardous waste" (61 FR 18792, April 29, 1996).

I have enclosed the MissDEQ response dated September 19, 2004 to this interpretation and approval of the interpretation with the exception of the discovery of free product or creosote saturated soils.

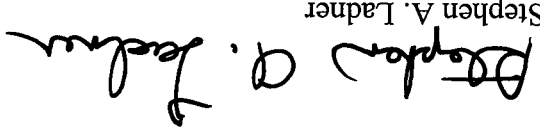
Based on these correspondences, KMC LLC is proposing the same waste classification be applied to the voluntary corrective measures at Columbus, Mississippi. KMC LLC will perform the same methodology of handling excavated materials "as if" they were hazardous, including the use of a hazardous waste hauler, manifest system and disposal in a RCRA landfill, but not classifying the waste as hazardous.

Please review this proposal and feel free to contact me, Steve Ladner at (405) 270-2625, if you have any further questions.

Thank you for your time and consideration in this matter.

Sincerely,

On behalf of KERR-MCGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION

  
Stephen A. Ladner  
Project Manager

cc: N. E. Bock, KM Shared Services

Barrett Cieutat, ERM

Dickie Allison, KM Shared Services  
T. L. Cubbage, KM Shared Services

August 29, 2002

Jerry Banks, PE  
Chief, Hazardous Waste Division  
Mississippi Department of Environmental Quality  
PO Box 10385  
Jackson, MS 39289-0385

RE: Waste Classification  
Former Gulf States Creosoting Site  
Hattiesburg, Mississippi

Dear Mr. Banks:

On Monday, August 19, 2002, Nick Bock and I discussed with you the issue of waste classification at the above-referenced site (Site). First we discussed the Agency's previous decision that impacted materials from offsite locations are not appropriately classified as listed hazardous waste. In spite of this, Mr. Bock expressed our concern in sending heavily contaminated materials to other than a secured, hazardous waste facility. We explained our proposal to handle these materials "as if" they were hazardous, to include using a hazardous waste hauler, manifest system and disposal at a RCRA landfill, but that the waste itself would not be classified as hazardous.

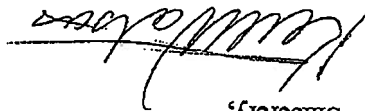
Mr. Bock proposed, for the following reasons, that the state should correctly extend this decision to impacted waste materials removed from the former facility Site. EPA supports this proposal, "It has been the Agency's longstanding policy that in cases where the origin of the contaminants is unknown, the lead agency may assume that contaminants in media did not originate from listed hazardous waste." (61 FR 18792, April 29, 1996). This is certainly the case for subsurface wastes at the Site, including those in the concrete sump and the wooden substructure. There is no way in to determine the origin of these materials. We committed to handle these materials in the same way that we propose to handle impacted offsite materials. Given our commitment on material handling, you indicated you could approve our proposal, and asked that we submit it in writing for your approval.



Mr. Jerry Banks, P.E.  
August 29, 2002  
Page 2

We appreciate your time and look forward to the Agency's approval of the previously-submitted final RAP. If you have any questions or comments, please call me at 405/270-3747 or Mr. Bock at 405/270-2394.

Sincerely,



A. Keith Watson  
Project Manager

cc: Nick Bock  
William Green  
Glen Pille' - Adams & Reese  
David Uptmegrave - Michael Pisaní & Associates



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

September 19, 2002

Mr. A. Keith Watson, Project Manager  
Kerr-McGee Chemical Corporation  
Kerr-McGee Center  
P.O. Box 25861  
Oklahoma City, Oklahoma 73125

Dear Mr. Watson:

RE: Waste Classification  
Former Gulf States Creosote Site  
Hattiesburg, MS

In response to your letter of August 29, 2002, I concur with the company's position on the classification of the wastes at the site, especially with regard to the concrete sump and wooden substructure. The only qualifier that I have is that if you find free product or creosote saturated soils during the remediation. The Mississippi Department of Environmental Quality would require that this material be recycled as commercial chemical product or else classified and disposed of as hazardous waste.

If you have any questions or comments, please call me at 601-961-5221.

Sincerely,

*Joseph B. Banks*  
Joseph B. Banks, P.E., DEB  
Chief, Hazardous Waste Division



**KERR-McGEE**

KERR-McGEE CENTER • P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

January 13, 2004

JAN 26 2004

Mr. Larry Hammill  
Mississippi DEQ  
Office of Pollution Control  
PO Box 10385  
Jackson, Mississippi 39289

Re: Former Wood Treating Site  
**Kerr-McGee Chemical LLC**  
Columbus, Mississippi

Dear Mr. Hammill:

Thank you for your site visit on December 17, 2003. This correspondence serves as documentation of our discussions and for site closure of the wood treating plant located in Columbus, Mississippi owned by Kerr-McGee Chemical LLC.

As per our discussions, KMC LLC submitted a site closure strategy document on June 13, 2003 identifying the scope and procedures to close the former wood treating plant. AS a follow-up, we scheduled a site visit on December, 17 to review the work performed at the site, and the new wastewater treatment plant. As we discussed during our meeting, a separate correspondence will be sent with the Annual Stormwater Monitoring Report to discuss the status of the stormwater permit at the end of the month.

This letter will review the aforementioned topics and our discussions:

#### **Plant Closure**

The demolition and closure of the site went according to the closure strategy prescribed in the workplan submitted in June. As was noted all existing structures with the exception of the maintenance building and office building were demolished. All areas involved in the process were demolished to grade leaving the concrete foundations at grade. Areas involved in the process, such as the Tank Farm, Retort building, and Drip Pad were sealed with asphalt over the concrete foundations for capping purposes.

As prescribed in the closure strategy workplan, the drip pad was closed as a Landfill.

A review of the site during your visit did not delineate areas of concern or areas that would need further investigation.

Mr. Larry Hammill  
January 13, 2004  
Page 2

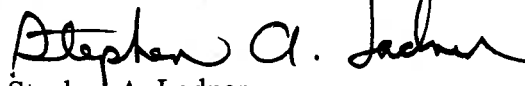
**Wastewater Treatment Plant**

As part of the tour and discussion, MissDEQ inspected the new wastewater treatment system that was re-piped and constructed in the former maintenance building. The new system utilizes the same methods to treat the groundwater as the former system. Enclosed please find a schematic of the new system (Attachment I).

Thank you for your time and consideration in this matter. Please feel free to contact me, Steve Ladner at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION



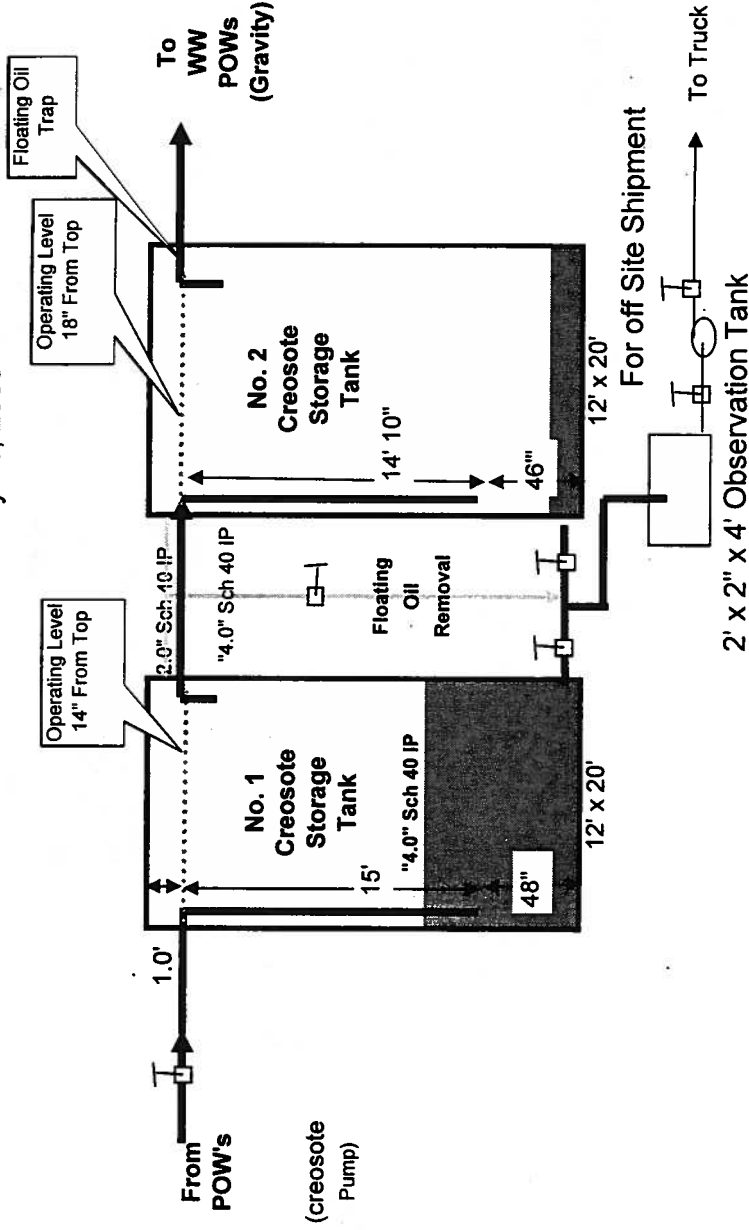
Stephen A. Ladner  
Project Manager

cc: Nick Bock  
T.L. Cabbage

# Creosote Storage Tanks

Columbus, MS

February 20, 2003

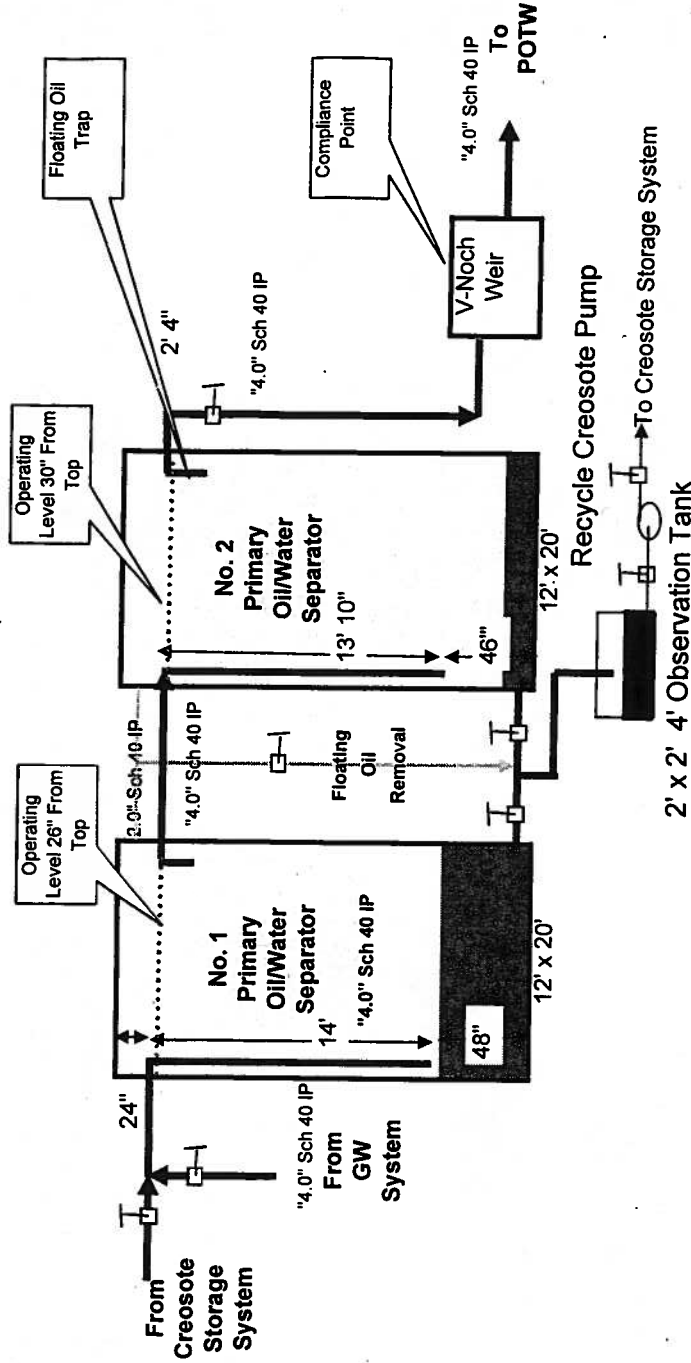


Valve	Pump	Creosote	Water	Liquid Operating Level	Floating Oil	Total Tank Volume:	Operating Tank Volume:
						16911 Gallons	14797 Gallons
Top of Tank Liquid Levels							
No 1	No 2	No 1	No 2	No 1	No 2	No 1	No 2
Creosote Storage Tank	Creosote Storage Tank	Primary Oil/Water Separator	Primary Oil/Water Separator	Primary Oil/Water Separator	Primary Oil/Water Separator	Primary Oil/Water Separator	Primary Oil/Water Separator

# Primary Oil Water Separators

Columbus, MS

February 20, 2003



Valve	Pump	Creosote	Water	Liquid Operating Level	Floating Oil	Total Tank Volume:	Operating Tank Volume:
						16911 Gallons	14797 Gallons
Top of Tank Liquid Levels							
No 1	No 2	No 1	No 2	No 1	No 2	No 1	No 2
Creosote Storage Tank	Creosote Storage Tank	Primary Oil/Water Separator	Primary Oil/Water Separator	Primary Oil/Water Separator	Primary Oil/Water Separator	Primary Oil/Water Separator	Primary Oil/Water Separator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

SEP 15 2003



OFFICE OF POLICY,  
ECONOMICS, AND INNOVATION

Mr. Stephen A. Ladner  
Senior Staff Environmental Specialist  
Kerr-McGee Chemical LLC  
Kerr-McGee Center  
P. O. Box 25861  
Oklahoma City, OK 73125

Dear Mr. Ladner:

We have received your letter of August 22, 2003 regarding the closure of your domestic wood preserving operations. In accordance with your request, we are withdrawing the following six facilities from the National Environmental Performance Track:

Kerr-McGee Chemical LLC, Madison, IL  
Kerr-McGee Chemical LLC, Springfield, MO  
Kerr-McGee Chemical LLC, Texarkana, TX  
Kerr-McGee Chemical LLC, Columbus, MS  
Kerr-McGee Chemical LLC, Indianapolis, IN  
Kerr-McGee Chemical LLC, The Dalles, OR

We regret that our relationship with these facilities is ending. Thank you for Kerr-McGee's participation in Performance Track and for your company's many efforts to improve its environmental performance. If you have any additional questions or comments about Performance Track, please feel free to contact me at (202) 566-2869 or [fiorino.dan@epa.gov](mailto:fiorino.dan@epa.gov).

Sincerely,

Daniel J. Fiorino  
Director, Performance Incentives Division

cc: Connie Raines, EPA Region IV  
Mark Messersmith, EPA Region V  
Craig Weeks, EPA Region VI

Chilton McLaughlin, EPA Region VII  
Bill Glasser, EPA Region X  
Don Watts, MS DEQ  
Angela Tin, IL EPA  
Marc Hancock, IN DEM  
Rob Borowski, TX CEQ  
Tod Crawford, MO DNR  
Marianne Fitzgerald, OR DEQ





July 29, 2003

Mississippi Dept. of Environmental Quality  
PO BOX 10385  
Jackson, Ms. 39289

Attn: Mr. Louis Crawford  
Permits Division

Re: Kerr McGee Plant Closure notification

Mr. Crawford:

Hydrovac Industrial Services, Inc. was recently notified for award of contract on the decommissioning of the KMC tie treating facility located in Columbus, Ms. The purpose of this letter is to provide courtesy notification of closure. We do this, having researched and having been told by MDEQ representative that no formal actions need to be taken or no permit is required. KMC delegates in their bid specifications that contractor is to perform notifications and obtain any needed permits. Should you have any questions or comments, please feel free to contact me at your convenience.

Ms. Contractors License #                      **12360**                      **exp. July 14, 2004**

License Classifications Held:                      **Building Construction, Industrial Plant  
Maintenance, Site Work, Hazardous Mat.  
Abatement and Remediation**

Regards,

A handwritten signature in black ink, appearing to read "Roger L. Guy", written over the printed name.

Roger L. Guy  
Hydrovac Industrial Services, Inc.  
Division Manager – Environmental Division

KERR - McGEE  
LOWNDS Co.  
PERMITS Permitting

RECEIVED  
JUL 30 2003  
Miss. Dept. of Environmental Quality  
Office of Pollution Control

STATE OF MISSISSIPPI



Certificate of Responsibility

No. 1 2 3 6 0

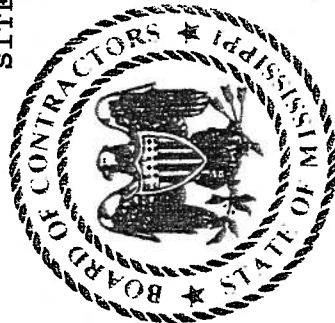
Which Expires Jul. 14, 2004

State Board of Contractors

THIS IS TO CERTIFY THAT

HYDRO-VAC INDUSTRIAL SERVICES, INC.  
66 NEW HOPE RD.  
COLUMBUS, MS 39702

is duly registered and entitled to practice  
BUILDING CONSTRUCTION INDUSTRIAL PLANT MAINTENANCE  
SITE WORK HAZARDOUS MAT. ABATEMENT & REMEDIATION



Witness our hands and Seal of the Board,  
dated Jackson, Miss. day of Jul., 2003

*W. L. Sh*

CHAIRMAN

*Norman Black*

SECRETARY



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

July 22, 2003

Mr. Stephen A. Ladner, Project Manager  
Kerr-McGee Chemical LLC, Forest Products Division  
P.O. Box 25861  
Oklahoma City, OK 73125

FILE COPY

Dear Mr. Ladner::

Re: Kerr McGee Chemical Corporation, Columbus  
Lowndes County  
Haz. Waste Ref. No. MSD990866329  
Closure Strategy Document

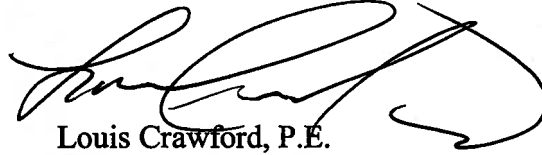
Review has been completed of the referenced submittal and we have the following comments:

1. The plan must have a Sampling & Analysis Plan for verification sampling. This plan must include sampling protocols, analysis methods, and specific action levels.
2. Verification sampling is necessary for any components, structures, and/or areas that are 'cleaned.'
3. Section IV references an attached table. This table was not received.
4. Please provide details for the cap proposed for the retort building basement and a plan for the disposal of any materials/residuals remaining in this structure.
5. Residual drippage is a common occurrence for treated wood storage areas. Some verification sampling should be proposed.
6. There are no Sections I or V; and there are two Sections IV.
7. We believe that rather than regulate the closed impoundment via the RCRA Permit (Part 264) and the Drip Pad area under Interim Status Standards (Part 265), given that much of the inspection and monitoring activities will be common to both areas, it will be more efficient to incorporate the closed Drip Pad Area into the existing RCRA Permit.
8. EPA must address any potential modifications and/or additional submittals required under the HSWA Permit.

1696 PER20000003

Please provide your response to these comments by August 25, 2003. If you have any questions,  
Please call me at 601-961-5117.

Sincerely,

A handwritten signature in black ink, appearing to read 'Louis Crawford', with a large, stylized flourish extending from the end of the signature.

Louis Crawford, P.E.  
Environmental Permits Division

cc: Mr. Russ McLean, U.S. EPA Rregion 4  
Mr. Larry Hammil, MDEQ

1696 PER20000003



**KERR-McGEE CHEMICAL LLC**  
KERR-McGEE CENTER • P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

June 23, 2003

**RECEIVED**  
**JUN 30 2003**  
Dept. of Environmental Quality  
Office of Pollution Control

Mr. Louis Crawford  
Mississippi DEQ  
Office of Pollution Control  
PO Box 10385  
Jackson, Mississippi 39289

Re: Closure Strategy Document  
Kerr-McGee Chemical LLC  
Columbus, Mississippi

Dear Mr. Crawford:

Enclosed please find a copy of the closure strategy for the Kerr-McGee Chemical LLC (KMC LLC) wood treating facility located in Columbus, Mississippi. The report is generated with the inclusion of our discussion points from the June 4, 2003 meeting. As we discussed, KMC LLC has made a business decision to exit the wood treating business and the plant is scheduled to cease operations in the Fourth Quarter, 2003.

It is our understanding that the closure strategy will need to be submitted 90 days prior to cessation of operations and will satisfy the state requirements for closure of a facility. The closure date is October 31, 2003.

In addition, the facility will continue to operate the groundwater remediation system on-site and maintain post-closure care of the closed impoundment area.

Thank you for your time and consideration in this matter. If you have any questions, please feel free to contact me, Steve Ladner at (405) 270-2625.

Sincerely,  
KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION

Stephen A. Ladner  
Project Manager

cc: N.E. Bock  
Larry Hammil, MissDEQ  
Jim Sanders, KMC LLC

CLOSURE STRATEGY  
FOR THE  
KERR-McGEE CHEMICAL LLC WOOD TREATING FACILITY  
IN  
COLUMBUS, MISSISSIPPI

## INTRODUCTION

The Kerr-McGee Chemical LLC wood treating facility is located in Columbus, Mississippi. The wood treating facility has been engaged in the production of railroad cross ties and specialty products, such as crossings and bridge timbers.

In December, 2002, KMC LLC decided to exit the wood treating business to more align the corporation with core businesses. As a result of this decision, the Columbus plant will cease operations before or by the end of 2003. KMC LLC will commence decommissioning efforts during the third and fourth quarters of 2003. In accordance with the facility's Hazardous Waste Permit, Post-Closure Care permit, Air permit, stormwater permit, and wastewater discharge permit, KMC LLC has prepared this closure strategy to address the management and disposition of manufactured products, by-products, raw materials, stored chemicals, equipment, solid and liquid wastes, residues during the on-site closure. KMC LLC will also discuss the future plans for the site which include: post-closure monitoring, groundwater remediation, management of the drip pad as landfill and the wastewater treatment system.

This document presents the closure strategy for the wood treating plant at Columbus. The following sections describe 1) the requirements and goals for closure; 2) activities for decommissioning equipment and facilities; 3) waste stream disposal options: both solid and hazardous; 4) evaluation of the wastewater system 5) drip pad closure; 6) management of other media; 7) post-closure care and groundwater remediation; 8) future use of the site. This closure strategy document is intended to satisfy the multi-media expectations for the state of Mississippi in addressing the closure of an industrial site.

KMC LLC is developing and evaluating various options for the wood treating plant closure.

## II. FACILITY DESCRIPTION

The treatment plant consists of over 60 acres with over 95% of the area used exclusively for material storage. The actual process areas compose only 5% of the site. The site can be divided up into the following areas:

- The Main Process area
- The Closed Impoundment area
- The Pine Yard – treated material storage
- The Mill Area
- Untreated tie storage on the main yard
- Treated tie storage on the main yard
- Office Area

The facility was built in 1926 and has treated railroad ties and specialty products with creosote since inception. KMC LLC purchased the facility in 1969 and has owned and operated the plant since that point in time. The facility upgraded the process area in the late 1980's to include secondary containment around tank storage, a drip pad constructed from concrete, three retort vessels used for pressure treating the ties.

Due to the age to the site, environmental cleanup of the groundwater and site have been taking place since the late 1980's under the oversight of the U.S. EPA and Mississippi DEQ.

## III. GOALS AND REQUIREMENTS FOR CLOSURE

Kerr-McGee Chemical LLC decided to exit the wood treating business to become more in alignment with the core businesses of petroleum exploration and the manufacturing of Titanium Dioxide. Operations at the Columbus plant will cease during the 3<sup>rd</sup> Quarter to early 4<sup>th</sup> Quarter of 2003. At the point of cessation of operations, KMC LLC will close and decommission the site in accordance with applicable regulatory requirements and the company's environmental, health, and safety policies and commitments. These commitments emphasize prevention of pollution, elimination of process excursions, and continuous improvement in environmental performance.

Closure requirements and goals for the KMC LLC wood treating plant include:

- Implementing closure in a manner that is protective of human health and the environment;
- Implementing closure in a manner that is consistent with applicable regulatory requirements;



- Implementing closure in a manner that facilitates reuse or beneficial use of existing property; and
- Implementing closure in a manner that minimizes impacts to the community

#### IV. ACTIVITIES FOR DECOMMISSIONING EQUIPMENT AND FACILITIES

##### Tank Decommissioning

The site has only above ground storage tanks. KMC LLC has been coordinating closely with creosote vendors to minimize any residual product at the site. Any unused product can be shipped to other active sites. For any product that would be unused, the facility will characterize according applicable state and federal regulations and dispose of them accordingly. All tanks will be cleaned out, cut up for scrap, decontaminated, and sent to a metal recycler. Any residual materials in the tank will be disposed in accordance with any applicable federal and state environmental regulations.

All piping related to the process is above ground and will be cleaned out, scrapped, decontaminated, and sent to a metal recycler.

##### Equipment

All equipment will be sold or shipped to other affiliates of KMC LLC. Fixed equipment will be dismantled, either sold or shipped another location.

##### Buildings and Above Ground Structures

Closure activities for buildings and above ground structures are similar. The majority of above ground structures are associated with wood processing and have no affiliation with the chemical processing. These structures will be torn down and any material that is suitable for re-use will be sold. The concrete foundation will remain in place.

Buildings associated with processing will be decommissioned with any construction debris requiring decontamination will be done prior to disposal. All concrete foundations will remain in place. The retort building basement will be filled with construction debris and capped.

## IV. CONCEPTUAL CLOSURE ACTIVITIES

### A. MAIN PROCESS AREA CLOSURE

The Main Process area consists of the following areas: the tank farms, retort cylinders, drip pad, wastewater treatment area.

#### Tank Farms

The tank farm areas will be decommissioned by first removing any sludge remaining in the existing tanks, handling this material like a hazardous waste if the tank was connected with creosote useage. Once the tanks have been cleaned out, the tank will be cut up, decontaminated on the drip pad, and the metal will be sold for scrap in conjunction with RCRA guidelines for recycling of metals.

Once the tanks have been decommissioned and scrapped, the concrete walls if not used for fill, will be collapsed, decontaminated, and sent to a solid waste disposal facility.

#### Retort Cylinders

The retort cylinders will be cleaned out and decontaminated. They will be evacuated from the building and subject to auction for sale. The building used to house the retort cylinders will be demolished.

#### Drip Pad

Pertaining to Drip Pad closure activities, as cited in 40 CFR 265.445:

- (a) At closure, the owner or operator must remove or decontaminate all waste residues, contaminated containment system components, contaminated subsoils, structures and equipment contaminated with waste and leakage, and manage them as hazardous waste.
- (b) If, after removing or decontaminating all residues and making all reasonable efforts to effect removal or decontamination of contaminated components, subsoils, structures, and equipment as required in paragraph (a) of this section, the owner or operator finds that not all contaminated subsoils can be practically removed or decontaminated, he must close the facility and perform post/closure care in accordance with closure and post/closure care requirements that apply to landfills (section 265.310).

In accordance with this regulation, KMC LLC intends to decontaminate all waste residues, containment system components, and equipment and managed them as hazardous waste as part of decommissioning activities scheduled for the spring of 2003.

This was performed within the 90 day removal deadline for such operations upon closure, and will be reported at the end of the decommissioning activities.

With regards to the underlying subsoils, KMC LLC excavated the subsoil prior to construction of the drip pad in 1988. The construction of the drip pad was designed to ensure that the drip pad did not leak. The construction method was to use two slabs of

concrete with an overall thickness of 18 inches. The pad has undergone weekly inspections since inception in 1988 and never had an identified release to the environment. This is also re-enforced by the annual certifications of the drip pad by a certified Professional Engineer since 1992. The certification further documents that the drip pad has not leaked or leached any materials. With the documentation of excavation of subsoils over 15 years ago and the quantification of no leakage since inception, the subsoils have not been impacted from operations of the past 15 years.

KMC LLC does not believe the subsoils represent a contaminated area of concern, as shown in the attached table. KMC LLC intends on closing the drip pad as a landfill as per the requirements of 265.310.

KMC LLC believes the best closure strategy would be to keep the engineered drip pad concrete structure intact where the concrete pad will serve as a cap for the landfill which would be represented as the underlying subsoils that would have a residual amount of contamination below the visible clean area, approximately 3 to 4 feet in depth. KMC LLC also understands that as a former wood treating site, subsoil contamination will be present and is already being remediated through a groundwater treatment system.

By closing the drip pad as a landfill, the requirements of 40 CFR 265.310 are being fulfilled:

- (a) At final closure of the landfill or upon closure of any cell
  - (1) The concrete cap will provide long term minimization of migration of liquids through the closed landfill
  - (2) Function with minimum maintenance
  - (3) Promote drainage and minimize erosion or abrasion of the cover
  - (4) Accommodate settling and subsidence so that the cover is maintained
  - (5) Have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present
- (b) After the final closure, KMC LLC will comply with all post-closure requirements contained in Sections 265.117 through 265.120 including maintenance and monitoring throughout the post-closure care period.
  - (1) Maintain the integrity and effectiveness of the final cover, including making repairs to the cover as necessary to correct the effects of settling, subsidence, erosion, or other events

- (2) Maintain and monitor the leak detection through groundwater wells
- (3) Maintain and monitor groundwater monitoring system
- (4) Prevent run-on and run-off from eroding or otherwise damaging the final cover, and;
- (5) Protect and maintain surveyed benchmarks used in compliance with 40 CFR 265.309

KMC LLC believes that the best use of the former drip pad is to utilize it as a cap for a landfill and close it in that fashion.

#### Waste Water Treatment Area

The waste water treatment area is composed of an oil water separator for primary treatment, secondary oil water separators with the ability to add a flocculent, and an aeration tank. This system currently treats both process and contaminated groundwater. Upon closure, the system will stay the same but will be used solely to recover and treat groundwater.

#### B. FORMER IMPOUNDMENT AREA

The former impoundment area will remain under the provisions of the Post-closure permitting requirements independent of the status of the facility. The Post-Closure permit requirements will be satisfied and an integral part of the managing the decommissioned site.

#### C. PINE YARD

The Pine Yard area is an area where there were no processing of ties. This area historically has served as treated tie storage for the customers longer term needs. To decommission the Pine Yard area, KMC LLC is requiring the customer to remove all treated inventory by a certain date prior to closing. Upon closing, if treated inventory remains a financial penalty will be applied to the customer.

With all treated inventory evacuated, KMC LLC will tear down all existing buildings on the Pine Yard. Areas where stationary equipment was located will be inspected for drippage of hydraulic fluid or oil. If these areas are stained, the stained soil will be cleaned up and sent to the appropriate landfill.

Since the Pine Yard is isolated from the main plant, a fence will remain around the site to prevent entrance into this area.

#### D. Wood Yards (Untreated and Treated)

The Wood Yard areas both untreated and treated will be completely liquidated of all inventory of lumber. Any associated equipment will be removed and auctioned off to the

highest bidders. Any buildings will be dismantled and scrapped. Any wood debris will be disposed of according to regulations. Any stained soils related to machinery or equipment will be cleaned and dealt with according to regulations.

#### E. Office Area

The office area will be dismantled and all materials will be auctioned. The main gate will remain at the office area.

### VI. WASTE STREAM DISPOSAL OPTIONS

#### A. Residual Wastes in Process Lines, Tanks, and Equipment

KMC LLC is closely working with vendors to monitor the supply of raw product, creosote, necessary for the complete treatment of untreated wood inventories. However, KMC LLC anticipates the presence of residual waste in process lines, tanks, and equipment. All residual waste will be characterized either by process knowledge and or by analytical testing. All residual waste upon characterization will be disposed of according to state and federal regulations. The most likely scenario is to utilize the high energy value in terms of BTU's in creosote sludge or tank bottoms and fuel blend the material. Other options will be explored if this is not economic.

All solid waste materials will be properly disposed of

#### B. Surface Soil

Visually discolored surface soils will be tested to determine the appropriate corrective action. Soils with analytical results below action levels will be left in place. Soil removed from visually stained areas will be characterized based on process knowledge and/or laboratory testing for proper disposal. If the material is deemed to be hazardous, it will be disposed of in accordance with the appropriate regulatory requirements.

KMC LLC envisions leaving the gravel veneer in place over most of the area formerly used for untreated and treated tie storage. KMC LLC envisions areas of discoloration to mainly be associated with areas used for processing and being related to hydraulic fluid leaks that will be visible upon demolition.

#### C. Wood Waste and Construction Debris

Construction debris, where practical, will be used to backfill areas or concrete foundations below grade. Construction debris that is not used for on-site fill will be treated as rubbish under the Mississippi solid waste regulations and disposed either in an off-site municipal landfill.

All treated wood inventory will be shipped to the customer prior to closure. Untreated inventory will be shipped out too. Any treated wood used as stringers and is no longer

needed in the process will be evaluated for the waste disposal options. Analytical data demonstrates that these ties are not characteristic wastes, and therefore, the used ties will either be recycled, or disposed of in a landfill.

#### D. Asbestos Containing Material

KMC LLC has done extensive inspections to make the plant an asbestos free area, however, if asbestos containing material is identified during the demolition, it will be handled and disposed of in accordance with the applicable regulations. KMC LLC has notified Johnnie Beeson of Miss DEQ of the potential for unknown asbestos issues arising from the closure of the plant.

#### E. Lead Based Paint

KMC LLC is not aware of any materials remaining on-site that used lead based paint. However, if materials are identified with lead based paint, they will be managed in accordance with applicable regulatory requirements for worker protection and disposal. KMC LLC has contacted Bickham Forshee in the MissDEQ to notify him of the plant closure and potential for any lead based paint issues.

#### F. Transformer Oil

KMC LLC inspected all transformers in 1993 to determine the classification based on PCB concentration. All transformers were below the 50 ppm threshold and were properly marked. Therefore all oils associated with transformers will be disposed of in accordance with appropriate regulations.

#### G. Universal Waste

Flourescent bulbs, light ballasts, batteries, and mercury switches will be inventoried and removed. KMC LLC recycles all fluorescent bulbs and will continue to utilize this practice. Any other materials will be managed in accordance with requirements for universal wastes.

### VII. MANAGEMENT OF OTHER MEDIA

#### A. Air Permit

KMC LLC believes that all air permits with the State of Mississippi will be voided upon cessation of operations at the site. Since there are no longer processes occurring, there are no longer emissions. KMC LLC has written a letter to the air group with this interpretation.

#### B. Stormwater Permit

KMC LLC believed that the stormwater permit would no longer be valid since there will be no SIC code for the site. However, discussions with MissDEQ indicate that the permit will continue to be enforce after closure and KMC LLC will be responsible for maintaining the requirements of the permit.

#### C. Hazardous Waste Permit

KMC LLC will continue to comply with the State Hazardous Waste permit after the plant closure

#### D. Wastewater Permit

KMC LLC will continue to discharge treated groundwater for remediation purposes after closure and will continue to comply with the components of the wastewater permit with the City of Columbus.

### VIII. GROUNDWATER REMEDIATION

KMC LLC will continue to operate a groundwater recovery, treatment and remediation system at the site. KMC LLC will hire contractor to maintain the routine operations and maintance of the groundwater extraction and monitoring system.

KMC LLC will continue to utilize in-house expertise for sampling and anaylsis of the groundwater monitoring system. KMC LLC will also continue to use outside consultants to assist at the site where their expertise will continue to benefit the overall performance of the corrective action efforts.

KMC LLC will continue to keep the US EPA apprised of all remediation related items.

### IX. ADDITIONAL CORRECTIVE MEASURE

KMC LLC has submitted the Final RFI Report for evaluation and comment by US EPA. KMC LLC will prepare and direct a Corrective Measures Study upon approval of the RFI Report by US EPA.

KMC LLC will reserve the right to submit interim voluntary corrective measures during this period for additional corrective measures.

### X. POST CLOSURE CARE

KMC LLC will continue to provide post closure care for the site upon closure as per the requirements of the permit. This would include at a minimum impoundment inspections, security, proper signs, cap maintenance, monitoring and financial assurance.

## XI. FUTURE USE OF THE SITE

KMC LLC does not plan to develop the site in an industrial or residential capacity. The site will be fenced, and operate solely as a remediation site. KMC LLC will maintain the site operationally and appearance-wise with the utilization of at least one full time contract employee with a backup person.





STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

June 20, 2003

FILE COPY

Mr. Stephen A. Ladner  
Staff Environmental Specialist  
Kerr-McGee Chemical LLC  
P. O. Box 25861  
Oklahoma City, OK 73125

Dear Mr. Ladner:

Re: Kerr McGee Chemical Corporation, Columbus  
Lowndes County  
Haz. Waste Ref. No. MSD990866329 RCRA Permitting - (4)  
Drip Pad Closure

Review has been completed of the outline submitted June 10, 2003. Please be advised that additional details will be necessary relative to decontamination of the pad itself as well as verification sampling.

We look forward to receiving the site-specific plan and will provide more detailed comments at that time. If you have any questions, please call me at 601-961-5117.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Crawford".

Louis Crawford, P.E.  
Environmental Permits Division

cc: Mr. Russ McLean, USEPA Region 4

1696 PER20000005



**KERR-McGEE CHEMICAL LLC**  
KERR-McGEE CENTER • P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

June 10, 2003

RECEIVED  
JUN 17 2003  
Dept. of Environmental Quality  
Office of Pollution Control

Mr. Louis Crawford, P.E.  
Office of Pollution Control  
Mississippi Department of Environmental Quality  
P.O. Box 10385  
Jackson, Mississippi 39289 - 0385

Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Facility  
Drip Pad Closure Example Document

Dear Mr. Crawford:

As per our meeting last week, I am enclosing an example document outlining the drip pad closure strategy that -McGee Chemical LLC (KMC LLC) is proposing. The example is from the Indianapolis, Indiana facility, which closed last year. Please review and let's discuss at your earliest convenience.

As agreed to during our meeting this will be formally incorporated into the Closure Strategy Report for the Columbus, Mississippi plant. This report is expected to be submitted within the next two weeks.

If you have any questions concerning this proposed groundwater investigation program, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL CORP.  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

cc: Russ McClean, USEPA - Region IV  
R. Murphey  
N. Bock

NEB



**KERR-McGEE CHEMICAL LLC**  
KERR-McGEE CENTER • P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

March 6, 2003

Mrs Peggy Dorsey  
Indiana Voluntary Cleanup Program  
2525 N Shadeland  
Indianapolis, Indiana 46219

Re: Closure of Drip Pad  
Kerr-McGee Chemical LLC  
Indianapolis, Indiana

Dear Mrs. Dorsey:

This correspondence serves as notification by Kerr-McGee Chemical LLC of the closing of the wood treating plant located in Indianapolis, Indiana. The last official working day was December 31, 2002. As per the regulations, KMC LLC is notifying the agency of the this cessation of operations and to notify the agency of the closure activities related to the Drip Pad as per regulations cited in 40 CFR 265 Subpart W.

Pertaining to Drip Pad closure activities, as cited in 40 CFR 265.445:

- (a) At closure, the owner or operator must remove or decontaminate all waste residues, contaminated containment system components, contaminated subsoils, structures and equipment contaminated with waste and leakage, and manage them as hazardous waste.
- (b) If, after removing or decontaminating all residues and making all reasonable efforts to effect removal or decontamination of contaminated components, subsoils, structures, and equipment as required in paragraph (a) of this section, the owner or operator finds that not all contaminated subsoils can be practically removed or decontaminated, he must close the facility and perform post/closure care in accordance with closure and post/closure care requirements that apply to landfills (section 265.310).

In accordance with this regulation, KMC LLC intends to decontaminate all waste residues, containment system components, and equipment and managed them as hazardous waste as part of decommissioning activities scheduled for the spring of 2003. This was performed within the 90 day removal deadline for such operations upon closure, and will be reported at the end of the decommissioning activities.

Mrs Peggy Dorsey  
March 6, 2003  
Page 2

With regards to the underlying subsoils, KMC LLC excavated the subsoil prior to construction of the drip pad in 1988. The construction of the drip pad was designed to ensure that the drip pad did not leak. The construction method was to use two slabs of

concrete with an overall thickness of 18 inches. The pad has undergone weekly inspections since inception in 1988 and never had an identified release to the environment. This is also re-enforced by the annual certifications of the drip pad by a certified Professional Engineer since 1992. The certification further documents that the drip pad has not leaked or leached any materials. With the documentation of excavation of subsoils over 15 years ago and the quantification of no leakage since inception, the subsoils have not been impacted from operations of the past 15 years.

KMC LLC does not believe the subsoils represent a contaminated area of concern, as shown in the attached table. KMC LLC intends on closing the drip pad as a landfill as per the requirements of 265.310.

KMC LLC believes the best closure strategy would be to keep the engineered drip pad concrete structure intact where the concrete pad will serve as a cap for the landfill which would be represented as the underlying subsoils that would have a residual amount of contamination below the visible clean area, approximately 3 to 4 feet in depth. KMC LLC also understands that as a former wood treating site, subsoil contamination will be present and is already being remediated through a groundwater treatment system.

By closing the drip pad as a landfill, the requirements of 40 CFR 265.310 are being fulfilled:

- (a) At final closure of the landfill or upon closure of any cell
  - (1) The concrete cap will provide long term minimization of migration of liquids through the closed landfill
  - (2) Function with minimum maintenance
  - (3) Promote drainage and minimize erosion or abrasion of the cover
  - (4) Accommodate settling and subsidence so that the cover is maintained
  - (5) Have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present
- (b) After the final closure, KMC LLC will comply with all post-closure requirements contained in Sections 265.117 through 265.120 including maintenance and monitoring throughout the post-closure care period.

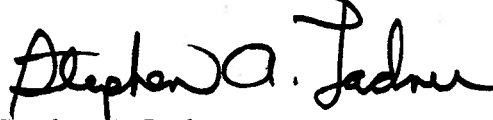
Mrs Peggy Dorsey  
March 6, 2003  
Page 3

- (1) Maintain the integrity and effectiveness of the final cover, including making repairs to the cover as necessary to correct the effects of settling, subsidence, erosion, or other events
- (2) Maintain and monitor the leak detection through groundwater wells
- (3) Maintain and monitor groundwater monitoring system
- (4) Prevent run-on and run-off from eroding or otherwise damaging the final cover, and;
- (5) Protect and maintain surveyed benchmarks used in compliance with 40 CFR 265.309

KMC LLC believes that the best use of the former drip pad is to utilize it as a cap for a landfill and close it in that fashion.

Please review this proposal and if you have any questions, feel free to contact me, Steve Ladner at (405) 270-2625.

Sincerely,  
KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION



Stephen A. Ladner  
Staff Environmental Specialist

cc: N.E. Bock  
Mike Evancho  
Steve Wampler-AquaEter

**COMPARISON OF TOTAL AND LEACHED (TCIP) CONSTITUENT CONCENTRATIONS  
AFTER FINAL EXCAVATIONS OF DRIP TRACK  
INDIANAPOLIS, INDIANA  
NOVEMBER 1987**

SAMPLE ID:	SPUDPT011	SPUDPT01L	SPUDPT021	SPUDPT02L	SPUDPT031	SPUDPT03L	SPUDPT041	SPUDPT04L	SPUDPT051	SPUDPT05L	SPUDPT061	SPUDPT06L
LOCATION:	DRIP	DRIP	DRIP	DRIP	DRIP	DRIP	DRIP	DRIP	DRIP	DRIP	DRIP	DRIP
TRACK	TRACK	TRACK	TRACK	TRACK	TRACK	TRACK	TRACK	TRACK	TRACK	TRACK	TRACK	TRACK
ANALYSIS:	TOTAL	TCIP	TOTAL	TCIP	TOTAL	TCIP	TOTAL	TCIP	TOTAL	TCIP	TOTAL	TCIP
UNITS:	ug/kg	ug/l	ug/kg	ug/l	ug/kg	ug/l	ug/kg	ug/l	ug/kg	ug/l	ug/kg	ug/l
<b>COMPOUND</b>												
<b>*****</b>												
2,3,4,6-Tetrachlorophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2,4-Dimethylphenol	338	BMDL	1490	BMDL	558	ND	ND	ND	149	ND	ND	ND
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Chlorophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acenaphthylene	3910	5.36	13700	28.2	1450	13.4	ND	ND	ND	6.45	1830	32.2
Benzo (a) anthracene	70200	ND	204000	ND	41900	ND	5020	ND	ND	ND	13300	ND
Benzo (a) pyrene	42600	ND	94200	ND	24300	ND	2190	ND	ND	ND	5570	ND
Benzo (b) fluoranthene	48800	ND	174000	ND	45300	ND	ND	ND	ND	ND	6550	ND
Carbazole	15900	82	46000	386	11900	122	BMDL	ND	ND	14.9	BMDL	153
Dibenzo (a, h) anthracene	5060	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Fluoranthene	238000	38.6	715000	43.3	173000	67.7	22600	ND	711	8.51	65700	37.8
Indeno (1,2,3-c,d) pyrene	20700	ND	39500	ND	12900	ND	ND	ND	ND	ND	2410	ND
Naphthalene	26000	207	150000	840	24600	257	69000	2770	9790	677	44500	2430
Pentachlorophenol	18100	19.6	38900	24.7	4670	ND	ND	ND	ND	ND	ND	ND
Phenanthrene	389000	89.7	1280000	245	218000	237	46400	BMDL	1430	38.6	83900	158
Phenol	ND	ND	634	ND	166	ND	ND	ND	ND	ND	ND	ND
p-Chloro-m-cresol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

ND-NON DETECTABLE  
BMDL-BELOW MINIMUM DETECTION LIMIT



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

March 31, 2003

Mr. Stephen A. Ladner  
Staff Environmental Specialist  
Kerr-McGee Chemical LLC  
P.O. Box 25861  
Oklahoma City, OK 73125

FILE COPY

Dear Mr. Ladner:

Re: Proposed Groundwater Assessment  
Kerr-McGee Chemical LLC  
Columbus, Lowndes County RCRA PERMITTING FILE  
MSD 990 866 329

Review has been completed of your proposed plan to investigate apparent groundwater contamination in the northeastern portion of the property, i.e., in the vicinity of CMW31.

We have no comments on this plan but do request that Kerr-McGee provide bi-monthly updates on the investigation. If you have any questions, please call me at 601-961-5117.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Crawford", written over the printed name.

Louis Crawford, P.E.  
Environmental Permits Division

pc: Mr. Russ McLean, EPA Region 4 (via e-mail)

d22:RCRA/gw2h02-1

KERR-McGEE  
LOWNDES CO.  
RCRA - PERMIT FILE



## KERR-McGEE CHEMICAL CORPORATION

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

March 25, 2003

Mr. Louis Crawford, P.E.  
Office of Pollution Control  
Mississippi Department of Environmental Quality  
P.O. Box 10385  
Jackson, Mississippi 39289 - 0385



Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Facility  
Proposed Groundwater Assessment: CMW31 Area

Dear Mr. Crawford:

Thank you again for the opportunity to visit with you this last month in Jackson. Based on the concerns you shared in your January 15, 2003 correspondence and the results of our meeting, Kerr-McGee Chemical LLC - Forest Products Division (KMCLLC-FPD) proposes a groundwater investigation program to address plume boundary questions and potential remedial measures in the vicinity of monitor well CMW31 at the Columbus, MS wood-treating facility.

KMCLLC-FPD proposes to utilize a Geoprobe system to assess the lithology and groundwater quality at the approximate locations shown on the accompanying figure. The number of Geoprobe locations may be increased or decreased based on information gathered as the program progresses. Each location will involve both a lithologic test with tool penetration to the Eutaw formation (approximately 13 to 17 feet below grade) and a second test to collect a representative groundwater sample for laboratory analysis. The groundwater samples will be collected, prepared, and shipped in accordance with the facility Sampling and Analysis Plan, and analyzed for the acid and base/neutral fraction of K001 constituents (method 8270) listed in the facility Post-Closure Permit. The Geoprobe investigation will continue until field evidence indicates that the plume associated with well CMW31 has been sufficiently delineated.

Following completion of the Geoprobe program and receipt of the groundwater laboratory analytical results, a groundwater monitor well installation program will be initiated. If warranted, additional monitor wells will be installed in the vicinity of CMW31 to represent permanent groundwater sampling locations. The wells will be constructed with 2-inch diameter Stainless Steel casing and screen, and will be set at depths suitable to monitor groundwater in the alluvial water table aquifer. All well installation, development, and completion activities will be conducted in accordance with the procedures presented in Attachment E of the approved facility Post-Closure Permit. An additional groundwater sampling episode will be conducted following installation of any additional monitor wells. The additional wells plus those wells in the immediate vicinity of well CMW31 (see attached figure) will be sampled for analysis of the specific K001 acid/base/neutral extractables (method 8270) listed in the Post-Closure Permit.





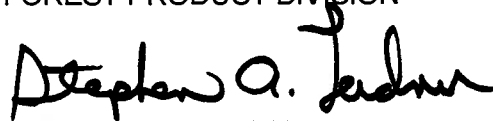
Mr. Louis Crawford, P.E.  
March 25, 2003  
Page 2

The results of the groundwater investigation and sampling program will be utilized to determine appropriate remedial measures for the impact associated with well CMW31. A report covering the results of the field assessment and proposals regarding possible remedial solutions will be submitted to the MDEQ under separate cover prior to submission of the Semi-annual Corrective Action Report due on October 1.

If you have any questions concerning this proposed groundwater investigation program, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-MCGEE CHEMICAL CORP.  
FOREST PRODUCT DIVISION

A handwritten signature in black ink, appearing to read "Stephen A. Ladner". The signature is fluid and cursive, with a large initial "S" and a stylized "L".

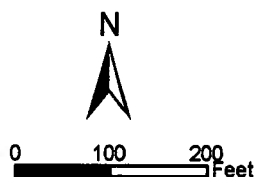
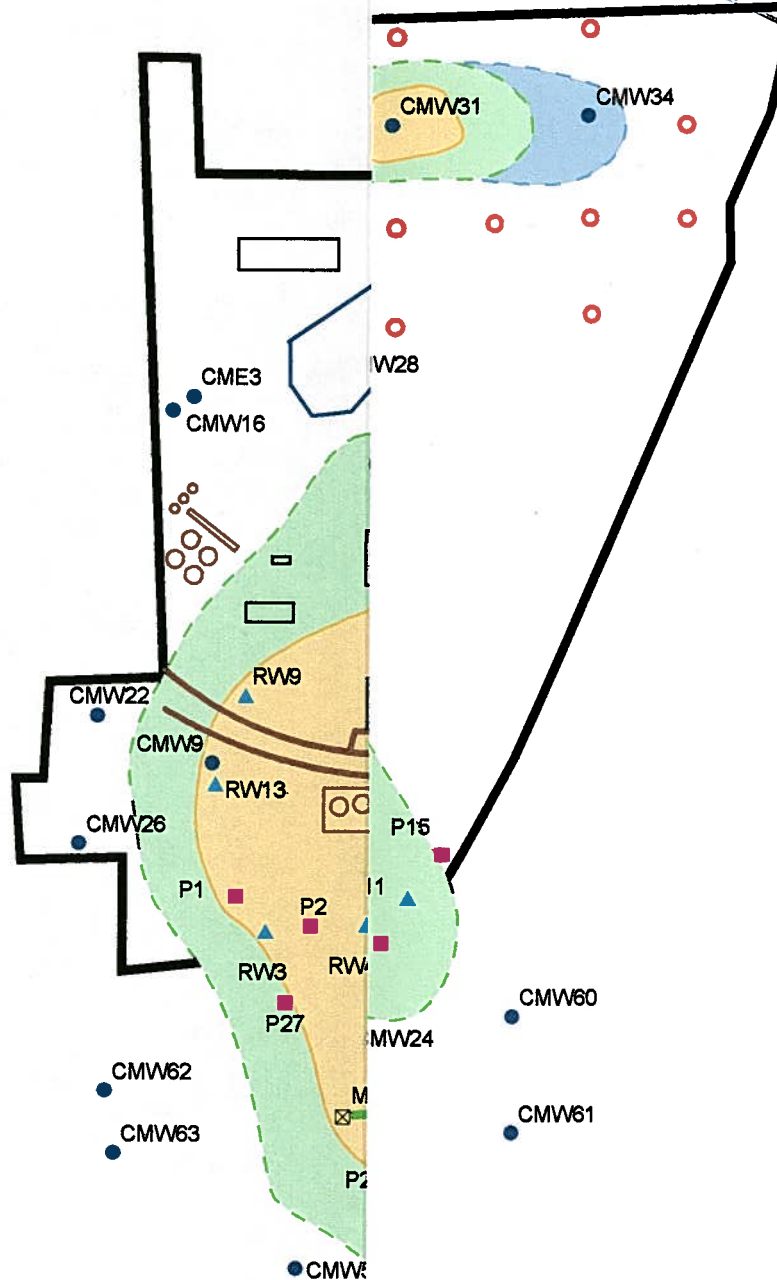
STEPHEN A. LADNER  
Staff Environmental Specialist

SL

Attachment

cc: Mr. Russ McClean, USEPA - Region IV  
R. Murphey - Columbus Facility  
Zane Hood - PPM Consultants  
T. Reed

RECEIVED  
MAR 23 2003  
MDEC



**LEGEND**

- CME - EUTAW WELLS
- CMW - SHALLOW WELLS
- PIEZOMETERS
- ▲ RECOVERY WELLS
- ⊗ RECOVERY SUMP
- ⊠ TRENCH
- APPROXIMATE FREE PRODUCT PLUME
- DISSOLVED CONSTITUENT PLUME
- NON-QUANTIFIED ("J") VALUE
- DISSOLVED CONSTITUENT PLUME
- PROPOSED GEOPROBE LOCATIONS

FIGURE 1  
DELINEATION OF CONTAMINATION  
PLUME - 11/5/02 WITH  
PROPOSED GEOPROBE LOCATIONS

Kerr-McGee Corporation

**COLUMBUS FACILITY  
KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION**

Drawn By: KB



**KERR-MCGEE CHEMICAL LLC**

2300 14TH AVENUE NORTH • COLUMBUS, MISSISSIPPI 39701

RECEIVED  
FEB 28 2002  
Miss. Dept. of Environmental Quality  
Bureau of Pollution Control

February 27, 2002

Mississippi Department of Environmental Quality  
Larry Hamil  
P.O. Box 10385  
Jackson, Mississippi 39289-0385

Dear Mr. Hamil,

Please find enclosed the 2001 Hazardous Waste Report for Kerr McGee Chemical LLC, Forest Products Division's Columbus, Mississippi plant. Should you have any questions regarding this report, please advise.

Sincerely,  
Kerr-McGee Chemical, LLC – FPD

Ronald P. Murphey  
Plant Manager

RPM/cjs

Cc: Steve Ladner  
File

Certified Mail # 7000 0520 0016 3783 2710



**FOREST  
PRODUCTS**

**MAIL THE  
COMPLETED FORM****TO:**The Appropriate EPA  
Regional or State Office.

United States Environmental Protection Agency

**RCRA SUBTITLE C SITE IDENTIFICATION FORM****1. Reason for Submittal**  
(see instructions on  
page 10)

CHECK CORRECT BOX(ES)

**Reason for Submittal:**

- ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).
- ☐ To provide subsequent notification (to update site identification information).
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application.
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # \_\_\_\_\_).
- ☒ As a component of the Hazardous Waste Report.

**2. Site EPA ID Number**  
(see instructions on page  
11)

EPA ID Number: MSD 990 866 329

**3. Site Name** (see  
instructions on page 11)

Name:

KERR MCGEE CHEMICAL LLC

**4. Site Location**  
Information (see  
instructions on page 11)

Street Address: 2300 14th AVE NORTH

City, Town, or Village: COLUMBUS

State: MS

County Name: LOWNDES

Zip Code: 39701

**5. Site Land Type** (see  
instructions on page 11)Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other**6. North American Industry**  
**Classification System**  
(NAICS) Code(s) for the  
Site (see instructions on  
page 11)

A.

321114

B.

C.

D.

**7. Site Mailing Address**  
(see instructions on page  
12)

Street or P. O. Box: 2300 14th AVE. NORTH

City, Town, or Village: COLUMBUS

State: MS

Country: UNITED STATES

Zip Code: 39701

**8. Site Contact Person** (see  
instructions on page 12)

First Name: CHARLES

MI: J

Last Name: SWANN

Phone Number: 662-328-7551

Phone Number Extension:

**9. Legal Owner and**  
**Operator of the Site** (see  
instructions on pages 12  
and 13)A. Name of Site's Legal Owner:  
KERR MCGEE CHEMICAL LLCDate Became Owner (mm/dd/yyyy):  
1964Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ OtherB. Name of Site's Operator:  
KERR MCGEE CHEMICAL LLCDate Became Operator (mm/dd/yyyy):  
1964Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

**10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 13, 14, 15, and 16)****A. Hazardous Waste Activities****1. Generator of Hazardous Waste**

(choose only one of the following three categories)

- ☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- ☐ d. United States Importer of Hazardous Waste
- ☐ e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, check all that apply:

- ☐ 2. Transporter of Hazardous Waste
- ☐ 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
- ☐ 4. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.
5. Exempt Boiler and/or Industrial Furnace
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, Refining Furnace Exemption
- ☐ 6. Underground Injection Control

**B. Universal Waste Activities****1. Large Quantity Handler of Universal Waste [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):**GeneratedAccumulated

- |                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| a. Batteries             | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Pesticides            | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Thermostats           | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Lamps                 | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Other (specify) _____ | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Other (specify) _____ | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Other (specify) _____ | <input type="checkbox"/> | <input type="checkbox"/> |

☐ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities****1. Used Oil Transporter - Indicate Type(s) of Activity(ies)**

- ☐ a. Transporter
- ☐ b. Transfer Facility

**2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)**

- ☐ a. Processor
- ☐ b. Re-refiner

☐ 3. Off-Specification Used Oil Burner**4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)**

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

**11. Description of Hazardous Wastes (see instructions on pages 16 and 17)****A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

F034						

[illegible][illegible]

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
Ronald P. Murphey	RONALD P. MURPHEY / PLANT MANAGER	02/27/2002

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: KERR MCGEE CHEMICAL LLCEPA ID NO: MSD 990 866 329U.S. ENVIRONMENTAL  
PROTECTION AGENCY

## 2001 Hazardous Waste Report

FORM  
GMWASTE GENERATION  
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

<b>Sec. 1</b>		<b>A. Waste description (page 22)</b> <u>CREOSOTE CONTAMINATED SOILS AND DEBRIS, RQ, HAZARDOUS WASTE SOLID, NOS (F034) 9, NA3071, P6III</u>			
<b>B. EPA hazardous waste code (page 22)</b> <u>F034</u>		<b>C. State hazardous waste code (page 22)</b> _____			
<b>D. Source code (page 23)</b> <u>G 07</u> Management Method code for Source code G25 <u>H</u>		<b>E. Form code (page 23)</b> <u>W 301</u>		<b>F. RCRA radioactive mixed (page 23)</b> <input type="checkbox"/> Yes	
		<b>G. Quantity generated in 2001 (page 23)</b> <u>135018.0</u>		<b>H. UOM (page 23)</b> <u>L</u> Density (page 24) <input type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

<b>Sec. 2</b>			
<b>Was any of this waste managed on site? (page 24)</b> <input type="checkbox"/> 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. 3)			
<b>ON-SITE PROCESS SYSTEM 1</b>		<b>ON-SITE PROCESS SYSTEM 2</b>	
<b>On-site Management Method code (page 24)</b> <u>H</u>	<b>Quantity treated, disposed, or recycled on site in 2001 (page 25)</b> _____	<b>On-site Management Method code (page 24)</b> <u>H</u>	<b>Quantity treated, disposed, or recycled on site in 2001 (page 25)</b> _____

<b>Sec. 3</b>			
<b>A. Was any of this waste shipped off site in 2001 for treatment, disposal, or recycling? (pages 25 and 26)</b> <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (FORM IS COMPLETE)			
<b>Site 1</b>	<b>B. EPA ID No. of facility to which waste was shipped (page 26)</b> <u>ARD 981 057 870</u>	<b>C. Off-site Management Method code Shipped to (page 26)</b> <u>H 061</u>	<b>D. Total quantity shipped in 2001 (page 26)</b> <u>135018.0</u>
<b>Site 2</b>	<b>B. EPA ID No. of facility to which waste was shipped (page 26)</b> _____	<b>C. Off-site Management Method code Shipped to (page 26)</b> <u>H</u>	<b>D. Total quantity shipped in 2001 (page 26)</b> _____
<b>Site 3</b>	<b>B. EPA ID No. of facility to which waste was shipped (page 26)</b> _____	<b>C. Off-site Management Method code Shipped to (page 26)</b> <u>H</u>	<b>D. Total quantity shipped in 2001 (page 26)</b> _____

Comments:



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

July 10, 2001

Mr. Stephen A. Ladner  
Staff Environmental Specialist  
Kerr-McGee Chemical LLC  
P.O. Box 25861  
Oklahoma City, OK 73125

FILE COPY

Dear Mr. Ladner:

Re: Groundwater Investigation Proposal  
Kerr-McGee Chemical LLC  
Columbus, Lowndes County  
MSD 990 866 329 RCRA Permitting

Review has been completed of the referenced document (submitted July 3, 2001) and we have the following comments:

1. In order to properly evaluate the proposal, please provide a summary of the results from the investigatory phase utilized to determine the locations of the proposed wells. ~~In particular, how will the western extent of this area be determined?~~
2. While at this time we can consider some well installation and sampling as part of an investigation, before adding any wells as 'boundary control' wells, a Class II RCRA Permit modification must be sought.
3. Discussions will be initiated with EPA to determine if this investigation may be conducted under the HSWA program, which may eliminate to need to require a permit modification any time new wells are needed and/or well designations are changed.

If you have any questions, please call me at 601-961-5117.

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

pc: Mr. Russ McLean, EPA Region 4 (via e-mail)  
d22:RCRA/gw2h00-2





**KERR-McGEE CHEMICAL LLC**  
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

July 3, 2001

RECEIVED

JUL - 9 2001

Dept. of Environmental Quality  
Office of Pollution Control

Mr. Louis Crawford, P.E.  
Office of Pollution Control  
Mississippi Department of Environmental Quality  
P.O. Box 10385  
Jackson, Mississippi 39289 - 0385

Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Facility  
Proposed Groundwater Boundary Well Investigation

Dear Mr. Crawford:

Thank you again for your time during our May 8<sup>th</sup> meeting in Jackson. Based on the concerns you shared in your March 2, 2001 correspondence and the results of our meeting, Kerr-McGee Chemical LLC - Forest Products Division (KMCLLC-FPD) proposes the installation of three groundwater monitoring wells to address plume boundary questions in the vicinity of monitor well CMW29 at the Columbus, MS wood-treating facility. The intention of this expansion of the groundwater monitoring network is to provide additional Boundary Wells for the groundwater monitoring program.

KMCLLC-FPD proposes to drill and install the three groundwater monitor wells at the locations shown on the attached figure. The wells will be installed the first week of August, 2001. The locations to the north, east, and south of well CMW29 are intended to determine both the limit of the groundwater plume boundary and the continuity of the plume between wells CMW29 and CMW27. These wells will be constructed with 2-inch diameter Stainless Steel casing and screen, and will be set at depths suitable to monitor groundwater in the alluvial water table aquifer. All well installation, development, and completion activities will be conducted in accordance with the procedures presented in Attachment E of the approved facility Post-Closure Permit.

Following well installation and development, each of the monitor wells will be sampled for analysis of the specific K001 acid/base/neutral extractables (method 8270) listed in the Post-Closure Permit. The results of the well installation and sampling program will be submitted to the MDEQ under separate cover prior to submission of the Semi-annual Corrective Action Report on October 1. If the sampling results indicate that boundary well compliance conditions are not yet satisfied with this program, then additional discussions will be conducted with the MDEQ to plan appropriate action.



Mr. Louis Crawford, P.E.

July 3, 2001

Page 2

If you have any questions concerning this proposed groundwater investigation program, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-MCGEE CHEMICAL CORP.  
FOREST PRODUCT DIVISION

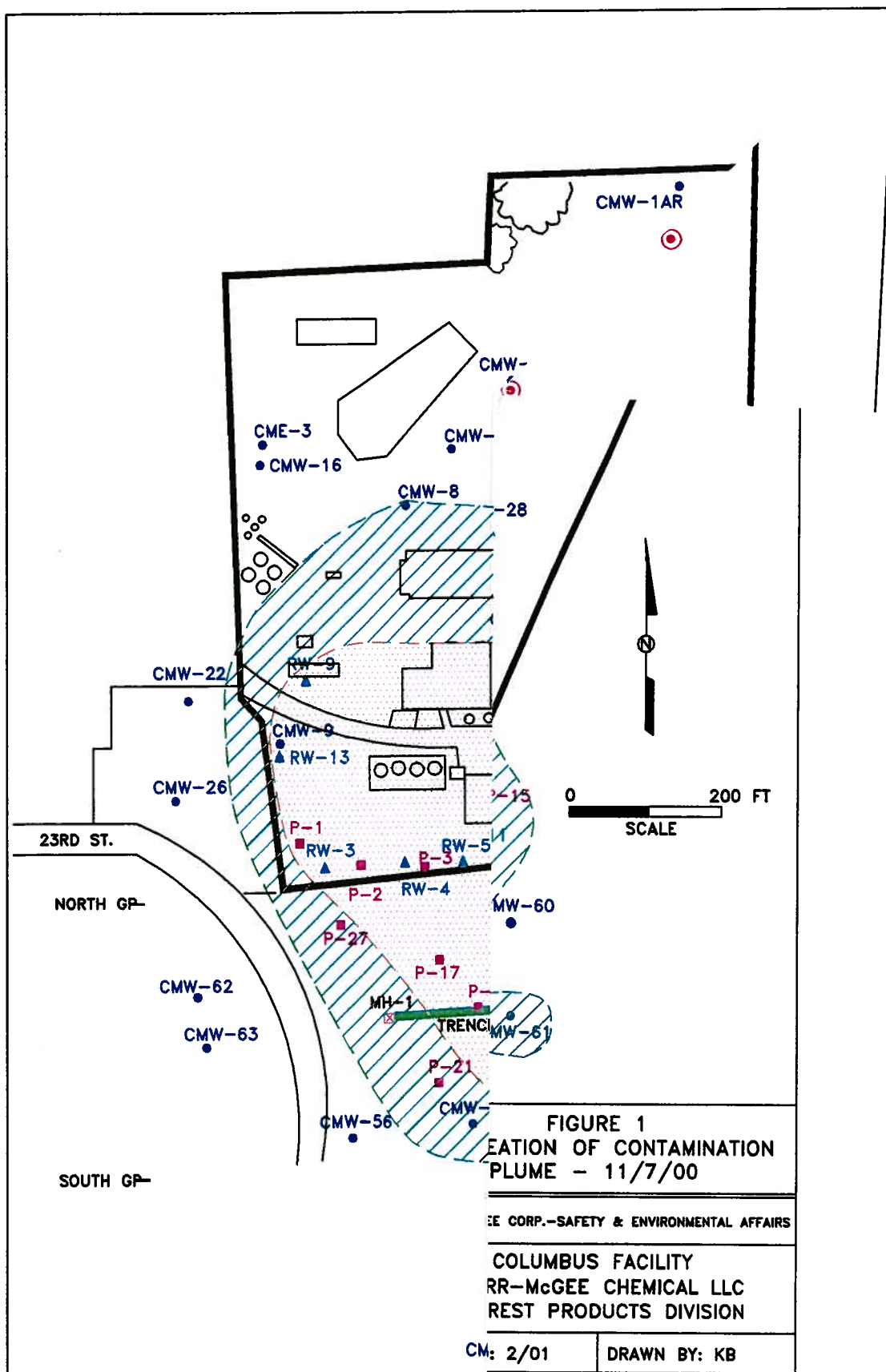


STEPHEN A. LADNER  
Staff Environmental Specialist

SL

Attachment

cc: Mr. Russ McClean, USEPA - Region IV  
R. Murphey  
T. Reed  
N. Bock





STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

June 13, 2001

CERTIFIED MAIL – 7000 0600 0027 0032 4526

Mr. Stephen A. Ladner  
Staff Environmental Scientist  
Kerr-McGee Chemical, LLC  
Forest Products Division  
P.O. Box 25861  
Oklahoma City, OK 73125

FILE COPY

Dear Mr. Ladner:

Re: Kerr McGee Chemical Corporation, Columbus  
Lowndes County  
RCRA Permit No. HW-990-866-329

Flap 4

Enclosed please find the environmental permit for which the above referenced action has been taken. Please note the limitations, schedules of compliance, monitoring requirements, and monitoring reporting dates found in this permit.

RCRA Permit No. HW-990-866-329 is issued in accordance with the provisions of the Mississippi Solid Waste Disposal Act of 1974 (Sections 17-17-1, et seq., Mississippi Code of 1972). Any appeal of these permit actions must be made within the 30-day period provided for in Section 49-17-29(4)(b) Mississippi Code of 1972.

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

Enclosure

Mr. Russ McLean, EPA Region 4

1696 PER20000005

**Permit Action Form**  
**Kerr McGee Chemical Corporation, Columbus**  
**2300 14th Avenue and 20th Street**  
**Lowndes County**  
**Columbus, MS 39703**

**Branch Manager: Toby Cook**  
**SIC: 2491**

**Recommendations**

**Folder No. – Activity Type**  
 PER20000005 - RA-HW-TSD

**Permit No.**  
 MSD990866329

**DEQ Contact**  
 Louis Crawford

**Action:** ☐ Issue  
☒ Reissue  
☐ Modification  
☐ Name Change  
☐ Transfer  
☐ Deny  
☐ Revoke

**By:** ☒ Division Chief  
☐ Permit Board

**Basis:** MHWMR Parts 260, 261, 264, 268, and 270.

**Coordination**

**Comments:** None. HSWA Permit to be issued separately.

**Relationships**  
 People

Name	Address	City	State	Zip	Relationship
Ron Murphey	PO Box 906	Columbus	MS	39703	Is Contact For
Ron Murphey	PO Box 906	Columbus	MS	39703	Is Permit Contact For

**Administrative Tasks**

Task	Scheduled Date	Completed Date
Letter Acknowledging Receipt of Application Issued	5/31/00	5/31/00
Application Received and Processed	5/16/00	5/16/00
Administrative Completeness Letter Issued	6/7/00	6/7/00
Determined Technically Complete		1/17/01
Send Draft Permit to ECED		1/22/01
Send Draft Permit to EPA		1/22/01
Send Draft Permit to Facility		1/22/01
Send Draft Permit to Supervisor		1/18/01
Issue Public Notice		4/16/01
Public Notice End Date		6/1/01

## Existing Permits

Permit Number	Description
Air-AIRS AFS	08700020
Air-Construction	168000020
Air-Synthetic Minor Operating	168000020
GP-Wood Treating	MSR22010
Hazardous Waste-EPA ID	MSD990866329
Water-Pretreatment	MSP090021

## FACT SHEET

FOR PERMIT UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT  
AT KERR-McGEE CHEMICAL LLC - FOREST PRODUCTS DIVISION  
COLUMBUS FACILITY  
LOWNDES COUNTY, MISSISSIPPI  
EPA I.D. NUMBER MSD 990 866 329

This fact sheet is prepared pursuant to Mississippi Hazardous Waste Management Regulations (MHWMR) 124.8 for the draft Permit Number HW-990-866-329 developed by Mississippi Department of Environmental Quality (MDEQ) for Kerr-McGee Chemical LLC - Forest Products Division, Columbus, Mississippi Facility.

### DESCRIPTION OF FACILITY

The Kerr-McGee Chemical, LLC, Columbus Facility (KMC) is a manufacturer of pressure-treated railroad products including wooden crossties, switch ties, and timbers. Wood treating activities at the site have occurred since 1928, although the property was not purchased by KMC until 1964. The site occupies approximately ninety (90) acres in Columbus, Lowndes County, Mississippi.

The process generated a wastewater that was treated in a surface impoundment system consisting of two surface impoundments (Surface Impoundments #1 and #2) and two Sand Filtration Beds. Following the adoption of the RCRA Regulations, KMC operated the surface impoundment system under Interim Status Standards until the unit could be closed and a wastewater treatment system discharging under a Pre-Treatment Permit installed.

On April 9, 1984, KMC submitted a Closure Plan for the impoundment system. Closure was completed June 18, 1986. Closure consisted of removal of all liquids, removal and recycling of any usable recovered product, removal and/or solidifying remaining sludges, backfilling with soil from the existing berms (adding clean soil as necessary), and the construction of a RCRA cap. The closed area covers approximately one acre.

Due to groundwater contamination resulting from the historic operations at this site, an extensive groundwater monitoring network and corrective action system are in place. Although it is believed that the majority of this contamination originated from Solid Waste Management Units (discussed below) and not the RCRA-Regulated Units, the site-wide system will generally be regulated under this permit; however, some off-site contamination is presently being addressed under separate actions.

### Discussion of Solid Waste Management Units (SWMUs)

The following is a list of the SWMUs at Kerr-McGee Chemical, LLC - Columbus Facility as outlined during the RCRA Facility Assessment (RFA) conducted in August, 1988. There were forty-one (41) SWMUs outlined during this RFA and subsequent investigations. These SWMUs have been grouped into eight (8) Solid Waste Management Areas (SWMAs) for investigation and remediation purposes. The regulated unit accounts for four of these SWMUs (28-31). In addition, three units (34-36) are active and are regulated under MHWMR Part 265, Subpart W. SWMU locations are shown on Figure 4 and SWMAs on Figures 4a through 4e.

<u>SWMU</u>	<u>Area</u>	<u>Description</u>
1	I-Retort	Retort Area Front Door Pit
2	I-Retort	Retort Area Front Door Pit North Sump
3	I-Retort	Retort Area Front Door Pit South Sump
4	I-Retort	Retort Sump
5	I-Retort	Drip Collection Tank 1
6	I-Retort	Drip Collection Tank 2
7	I-Retort	Drip Collection Tank 3
8	I-Retort	Work Tank 1
9	I-Retort	Work Tank 2
10	III-Tank Farm	Work Tank 3
11	III-Tank Farm	Work Tank 4
12	III-Tank Farm	Work Tank 5
13	-----	Overhead Piping
14	III-Tank Farm	Sap Tank
15	III-Tank Farm	Sump for Tank Car Unloading
16	III-Tank Farm	Vapor Tank Sump
17	IV-WW Treatment	Wastewater Underground Pipes
18	III-Tank Farm	Truck Unloading Sump
19	-----	Wood Boiler
20	III-Tank Farm	Creosote Storage Sump
21	IV-WW Treatment	Primary Oil/Water Separator
22	IV-WW Treatment	Polymer Addition Area
23	IV-WW Treatment	Secondary Dual Compartment Oil/Water Separator
24	IV-WW Treatment	Holding Tank 1
25	IV-WW Treatment	Holding Tank 2
26	IV-WW Treatment	Holding Tank 3
27	IV-WW Treatment	Holding Tank 4
28	-----	Aeration Impoundment
29	-----	Sedimentation Impoundment
30	-----	Sand Filter Bed 1
31	-----	Sand Filter Bed 2
32	VI-Waste Piles Waste Pile 1	
33	VI-Waste Piles Waste Pile 2	
34	II-Drip Pad	Drip Track
35	II-Drip Pad	Drip Track Drain and Sump
36	VII-Black Tie Storage	Black Tie Storage Area
37	VIII-Drainage Ditches	Drainage Ditches
38	V-Cooling Tower Basin	Cooling Tower Surface Impoundment
39	-----	Two Cooling Tower Basins
40	III-Tank Farm	Rainwater Tank
41	-----	Cyclone Dumpster

Remediation activity for these units is regulated by EPA under the conditions of the Hazardous and Solid Waste Amendments of 1984 (commonly referred to as HSWA) and a Federal Permit issued August 8, 1988. This permit will be reissued concurrently with the State of Mississippi permit and is described in a separate Fact Sheet. The provisions of this Federal permit will be included in the State permit in anticipation of the State's receiving certification for the HSWA program.



## PROCEDURES FOR PERMIT ISSUANCE

As described in the public notice, persons interested in commenting on this permit should submit written comments to:

Mississippi Environmental Quality Permit Board  
P. O. Box 10385  
Jackson, MS 39289-0385

This permit will be issued in conformance with Parts 124 and 270 of the Mississippi Hazardous Waste Management Regulations. The comment period for this permit begins April 16, 2001, and ends at 4:30 p.m. on June 1, 2001. All comments entered into the record, will be considered by the Permit Board before final disposition of the draft permit will be made. Public participation in the permit process is encouraged. For additional information, please contact Mr. Louis Crawford at (601) 961-5171.

## PERMIT PROCESS

The purpose of the permitting process is to afford MDEQ and interested citizens the opportunity to evaluate the ability of the Permittee to comply with the applicable requirements promulgated under the Resource Conservation and Recovery Act (RCRA). The permit conditions are set forth in one concise permit document which describes all statutory requirements of RCRA with which this facility must comply during the duration of the permit.

## PERMIT STRUCTURE

The permit is divided into ten parts: A cover sheet setting forth the basic legal authority for issuing the permit, a section on standard conditions applicable to all hazardous waste management permits (Module I), a section on standard conditions applicable to all hazardous waste management facilities (Module II), a section regulating post-closure care of the closed surface impoundment (Module III), a section establishing requirements for a groundwater monitoring program (Module IV), a section on the corrective action conditions applicable to the former surface impoundment area (Module V), a section on the corrective action conditions applicable to solid waste management units at this particular facility (Module VI), a section addressing applicable land disposal restrictions (Module VII), a section addressing applicable organic air emissions (Module VIII), and a section addressing waste minimization activities (Module IX). The permit also includes attachments incorporating information taken from the application which expand on permit requirements.

## BASIS FOR DRAFT PERMIT CONDITIONS

The following section is a summary of the basis for the conditions in the permit. This discussion is organized such that the reviewer can cross-reference conditions of the permit to the section.

## PERMIT CONDITIONS

### COVER

Permit Authority	Part 124	Cover
Permit Duration	Part 260	Page
	Part 261	
	Part 264	
	Part 268	
	Part 270	

### MODULE I

Module I of the permit sets forth standard administrative conditions applicable to all hazardous waste management permits. Unless otherwise specified, all citations refer to the regulations as codified in Mississippi Hazardous Waste Management Regulations (MHWMR).

<u>Activity</u>	<u>Regulation (MHWMR)</u>	<u>Permit Condition</u>
Effect of Permit	270.4 270.30(g)	I.A.
Permit Actions	270.30(f) 270.41 270.42 270.43	I.B.
Severability	124.16	I.C.
Definitions	Part 124 Part 260 Part 261 Part 264 Part 270 RCRA	I.D.
Duty to Comply	270.30(a)	I.E.1.
Duty to Reapply	270.10(h)	I.E.2.
Permit Expiration	270.50	I.E.3.
Permit Review Period	270.50(d)	I.E.4.

Obligation for Corrective Action	264.100(f)	I.E.5.
Need to Halt or Reduce Activity	270.30(c)	I.E.6.
Duty to Mitigate	270.30(d)	I.E.7.
Proper Operation and Maintenance	270.30(e)	I.E.8.
Duty to Provide Information	264.74(a) 270.30(h)	I.E.9.
Inspection and Entry	270.30(i)	I.E.10.
Monitoring and Records	264.74(b)	I.E.11.
Reporting Planned Changes	270.30(l)(1)&(2)	I.E.12.
Anticipated Noncompliance	270.30(1)(2)	I.E.13.
Transfer of Permit	264.12(c) 270.30(1)(3) 270.40	I.E.14.
Compliance Schedules	270.30(l)(5)	I.E.15
Twenty-four Hour Reporting	270.30(1)(6)	I.E.16.
Other Noncompliance	270.30(1)(10)	I.E.17.
Other Information	270.30(1)(11)	I.E.18.
Signatory Requirement	270.11 270.30(k)	I.F.
Information Submissions	Part 264 270.31	I.G.
Confidential Information	270.12	I.H.
Maintenance of Documents	Part 264	I.I.
Special Conditions	Guidance	I.J.

## MODULE II

Module II of the permit sets forth the specific conditions for this facility with which the Permittee must comply.

<u>Activity</u>	<u>Regulation (MHWMR)</u>	<u>Permit Condition</u>
Facility Description	270.14(b)(1)	II.A. Attachment B
Design and Operation	264.31	II.B.
Required Notices	264.12	II.C.
Security	264.14	II.D. Attachment B
Inspections	264.15	II.E. Attachment C
Location Standards	264.18	II.F.
Recordkeeping	264.73	II.G.
Financial Requirements	264.140(c)	II.H.

## MODULE III

Module III sets forth conditions for providing post-closure care for the closed units.

<u>Activity</u>	<u>Regulation (MHWMR)</u>	<u>Permit Condition</u>
Applicability	264.110	III.A.
Post-Closure Care Period	264.117	III.B.
Post-Closure Inspection	264.280(c)	III.C.
Post-Closure Groundwater Monitoring	264.117(a) 264.228(b)(3)	III.D.
Post-Closure Maintenance	264.228(b)	III.E.
Post-Closure Property Use	264.117	III.F.

Removal of Waste	264.117(c)	III.G.
Completion of Care Period	264.120	III.H.
Retention of Plan	264.118(b) and (c)	III.I.
Post-Closure Permit Modifications	264.118(d)	III.J.

#### **MODULE IV**

Module IV of the permit establishes specific requirements by which the Permittee must conduct monitoring of the groundwater under the plant site. The conditions in this module, as well as those in Attachment D, are written to ensure compliance with MHWMR Part 264, Subpart F.

<b><u>Activity</u></b>	<b><u>Regulation (MHWMR)</u></b>	<b><u>Permit Condition</u></b>
Applicability	Part 264, Subpart F	IV.A
Corrective Action Monitoring Program	264.91(a)(3)	IV.B.
Groundwater Monitoring System	Part 264, Subpart F	IV.C.
Groundwater Protection Standards	264.92	IV.D.
Concentration Limits	264.94	IV.E.
Point of Compliance	264.95	IV.F.
Compliance Period	264.96	IV.G.
Monitoring Requirements	264.99	IV.H.
Sampling and Analysis Procedures, Evaluation, and Reporting	264.97	IV.I IV.J. IV.K. IV.L. IV.M.

## MODULE V

Module V established specific conditions as to how the Permittee will address releases from the former surface impoundment area.

<u>Activity</u>	<u>Regulation (MHWMR)</u>	<u>Permit Condition</u>
Applicability	264.100 264.101	V.A.
Corrective Action Plan	264.100	V.B. Attachment F
Corrective Action Period	264.100(f)	V.C.
List of Hazardous Constituents	264.100(a)(1)	V.D.
Concentration Limits	264.100(a)(2) 264.100(b)	V.E. IV.D.
Corrective Action to Property Boundary	264.100(e)	V.F.
Reporting	264.100(g)	V.G.
Modifications	264.100(h)	V.H.

## MODULE VI

Module VI establishes specific conditions as to how the Permittee will address releases or potential releases from solid waste management units and areas of concern. This particular activity is currently regulated by U.S. EPA under the Hazardous and Solid Waste Amendments of 1984 (commonly referred to as HSWA). This permit duplicates the requirements contained in the Federal Permit which was issued by EPA. This module will not become effective until the State of Mississippi receives authorization for HSWA.

## MODULE VII

Module VII of this permit outlines land disposal restrictions in accordance with MHWMR Part 268.

## MODULE VIII

Module VIII outlines actions that must be taken should the Permittee construct any units regulated by MHWMR Part 264, Subparts AA, BB, and/or CC.

## Module IX

Module IX outlines the requirements of Waste Minimization required of all RCRA facilities.

**ATTACHMENT A**

Attachment A to the permit consists of figures to clarify unit descriptions and/or permit conditions.

**ATTACHMENT B**

Attachment B to the permit describes the facility and the regulated units.

**ATTACHMENT C**

Attachment C to the permit outlines the schedule for inspecting the closed unit and corrective action system.

**ATTACHMENT D**

Attachment D to the permit duplicates the post-closure plan for the closed surface impoundment as submitted in the application.

**ATTACHMENT E**

Attachment E to the permit consists of the monitoring plans for groundwater and includes sampling and analysis protocol, statistical analysis methods, etc. as submitted by the applicant.

**ATTACHMENT F**

Attachment F to the permit consists of the corrective action plan for the surface impoundment area submitted as a part of the application.

**ATTACHMENT G**

Attachment G outlines the objectives of a Waste Minimization Plan.

**ATTACHMENT H**

Attachment H to the permit consists of a summary of descriptions of the Solid Waste Management Units and Areas of Concern.

**ATTACHMENT I**

Attachment I to the permit provides an outline for a RCRA Facility Investigation Work plan for the Permittee to follow in any submittal.

**ATTACHMENT J**

Attachment J to the permit provides an outline for a Corrective Measures Study for the Permittee to follow in any submittal.

**ATTACHMENT K**

Attachment K to the permit provides procedures to be utilized for calculating action levels to be used for remediations under HSWA.

**ATTACHMENT L**

Attachment L to the permit summarizes the schedule of compliance for various activities required by the permit.

## VARIANCES

The regulations cited above do not provide for variances.

## PROCEDURES

The Mississippi Hazardous Waste Management Permit will cover those portions of RCRA for which it has final authorization to administer. A separate Federal permit addresses the Hazardous and Solid Waste Amendments of 1984. Together, these permits constitute the RCRA permit for this facility. The State permit is written to facilitate inclusion of those conditions contained in the Federal permit should the State receive authorization for the appropriate sections of the Amendments.

The regulations under 40 CFR and MHWMR 124.10 require that a 45-day comment period be instituted for each draft permit under the Resource Conservation and Recovery Act. The comment period will begin on April 16, 2001, which is the date of publication of the public notice in major local newspapers of general circulation, and will end at 4:30 p.m. on June 1, 2001. The public notice will also be broadcast over a local radio station.

Persons wishing to require a public hearing or to comment on the permit application or the proposed permit conditions should submit such requests or comments in writing to the Permit Board at the address above.

When MDEQ makes a final permit decision to either reissue, deny or modify the permit, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review is requested under MHWMR 124.19. If no comments requested a substantial change in the draft permit, the final permit shall become effective immediately upon issuance.



LOWNDEU CO., KERR-McGEE, PERMIT (CHANGE OUT LABEL), CUA



January 26, 2001

Mr. Russ McLean  
Project Manager  
United States Environmental Protection Agency  
Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

RECEIVED  
FEB - 5 2001  
Dept. of Environmental Quality  
Office of Pollution Control

Re: SWMU Assessment Report (SAR)  
Columbus, Mississippi Facility  
EPA ID Number MSD 990 866 329

Dear Mr. McLean:

Kerr-McGee Chemical LLC (KMC LLC) submitted the analytical data for the testing of the SWMU to the agency within 15 days of receipt as per permit condition II.B.2. Based on the concentrations of KOO1 constituents, this area warrants further investigation, as per permit condition II.B.3. Also, as per permit condition II.B.3, KMC LLC will submit a SWMU Assessment Report (SAR) to this office within 90 sixty days of receipt of this analytical. Based on this condition, KMC LLC agreed to a SAR no later than January 28, 2001.

Enclosed please find two (2) copies of the SAR for the Columbus facility. If you have any questions or need additional information, please do not hesitate to call me, Steve Ladner at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION

Steve Ladner  
Staff Environmental Specialist

cc: N. E. Bock, KMC LLC  
R.P. Murphey, KMC LLC - Columbus  
T. R. Reed, KMC  
Barrett Cieutat, ERM  
David Lee, Miss DEQ



January 24, 2001

Mr. Steve Ladner  
Kerr-McGee Chemical LLC  
123 Robert S. Kerr  
# MT 1206  
Oklahoma City, Oklahoma 73102

RE: SWMU Assessment Report - Newly Identified SWMU  
Columbus, Mississippi Facility  
EPA ID Number MSD 990 866 329



Dear Mr. Ladner:

This solid waste management unit (SWMU) assessment report (SAR) presents the results of evaluation activities for a newly identified SWMU at the Kerr-McGee Chemical LLC (KMC) facility in Columbus, Mississippi. The newly identified SWMU is described herein as the Brickyard. This SAR addresses each of the requirements identified in Permit Condition II.B.3, which are summarized in Attachment 1, Table 1. A facility location map is shown in Attachment 1, Figure 1.

### ***Background***

The Brickyard was initially reported to the United States Environmental Protection Agency, Region IV (USEPA) as an area of concern (AOC) based on the presence of isolated visible occurrences of a tar-like substance at ground surface with a footprint of approximately 50 feet by 25 feet. KMC performed USEPA-requested sampling on September 26, 2000 by collecting surficial material and analyzing it for K001 semivolatile organic constituents. Laboratory-reported analytical results were submitted to the USEPA in correspondence dated November 9, 2000. The results indicated the presence of multiple polynuclear aromatic hydrocarbons (PAHs) above respective limits of quantitation (Attachment 1, Table 2), and therefore, KMC committed to additional investigation of the area. Field activities were conducted on December 14, 2000, and consisted of focused excavations at 13 locations. A summary of the excavation activities is included in subsequent sections of this SAR.

### ***Permit Requirements for a Newly Identified SWMU***

Regulatory requirements for a newly identified SWMU are included in Permit Condition II.B.3. Attachment 1, Table 1 provides a summary of the Condition II.B.3 requirements. In addition, detailed responses to each of the permit conditions are listed below:

#### Location of the SWMU on a Topographic Map

The approximate location of the Brickyard is shown in Attachment 1, Figure 2. In accordance with 40 CFR 270.14 (b)(19), the figure includes the following, as appropriate:

- Map scale and date;
- 100-year floodplain area;
- Surface water bodies including intermittent streams;
- Surrounding land uses;
- A wind rose;
- Orientation of map;
- Approximate legal boundaries of the facility;
- Access control feature;
- Ground water recovery components;
- Buildings; treatment, storage, and disposal operations; or other structure;
- Barriers for drainage or flood control; and
- Location of operational units within the facility boundary where hazardous waste is treated, stored, or disposed.

#### Designation of the Type and Function of the SWMU

The Brickyard occupies an area of approximately 150 feet by 50 feet (Attachment 1, Figure 2). It consists of a layer of brick fragments and black-colored tar-like material that varies in thickness from 1 to 8 inches, as determined from excavation activities conducted on December 14, 2000. This layer generally underlies gravel fill at a depth of 6 to 12 inches below ground surface. Field data suggests that the bricks and associated residuals were used as fill material.

#### General Dimensions, Capacities, and Structural Description of the SWMU

As mentioned above, the approximate surface dimensions of the Brickyard are 150 feet by 50 feet (Attachment 1, Figure 2). Assuming a conservative thickness of eight inches for the entire surficial footprint, the total estimated volume of material is approximately 185 cubic yards. Field observations and historical record reviews do not indicate that this was a designed waste management area. The waste material is present directly above naturally occurring silt and silty clay soil.

#### Dates of SWMU Operation

While historical records do not indicate dates of operation for this SWMU, the operational period was likely prior to KMC purchasing the facility in 1964.

Specification of all Wastes that have been Managed in the SWMU

The material present within the Brickyard appears to be a mixture of brick fragments and tar-like material. Laboratory-reported analytical data for the tar-like material is included as Attachment 1, Table 2.

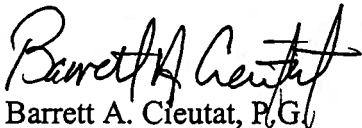
Available Information Pertaining to any Release of Hazardous Waste or Hazardous Constituents from the SWMU

Numerous historical sampling activities have been conducted in the vicinity of the Brickyard to delineate the horizontal and vertical extent of impact to soil and ground water in accordance with agency-approved work plans for unrelated environmental issues. A ground water recovery program was implemented, and there are components located hydraulically downgradient of the Brickyard. Attachment 1, Figure 3 illustrates boring locations, monitor well locations, and recovery components, as well as a recent depiction of the potentiometric surface for the uppermost water-bearing zone (alluvial formation). As shown, ground water in the vicinity of the Brickyard is within the hydraulic control of the existing recovery system. Boring logs from previous investigative activities that are located in the area proximal to the Brickyard are included in Attachment 2.

If you have any questions or comments regarding this correspondence, please contact me at (504) 831-6700, extension 27.

Sincerely,

Environmental Resources Management



Barrett A. Cieutat, P.G.  
Associate

BAC/dmz

Attachments

## **Attachment 1**

**Environmental Resources Management**  
3501 North Causeway Boulevard, Suite 200  
Metairie, Louisiana 70002  
(504) 831-6700

TABLE 1

## PERMIT REQUIREMENTS FOR NEWLY IDENTIFIED SWMU

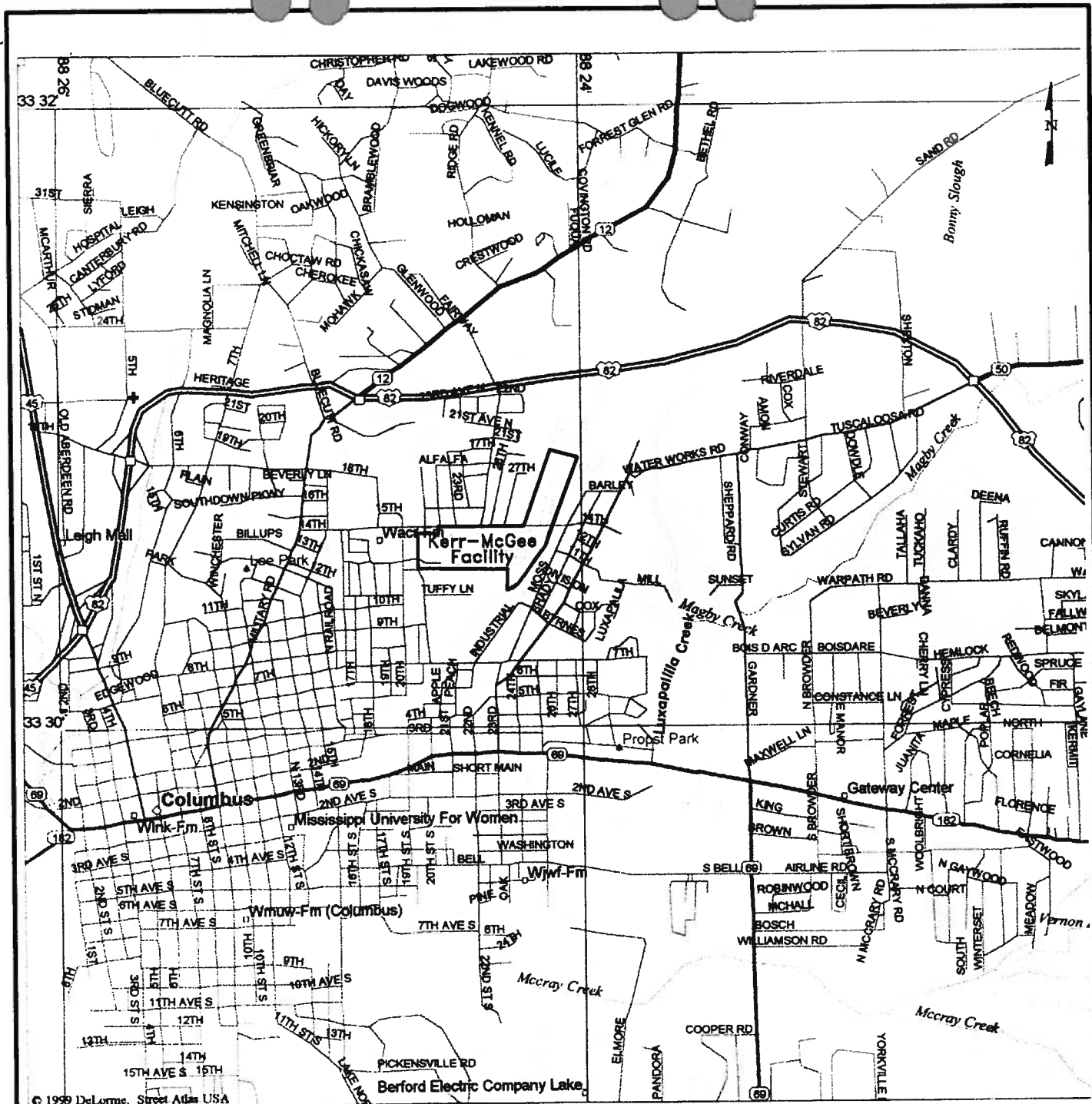
Kerr-McGee Chemical, LLC  
Columbus, Mississippi

<u>Permit Requirements</u>	<u>Location(s) in SAR</u>
1. Location of SWMU on topographic map of appropriate side to satisfy 40 CFR 270.14(b)(19)	Page 2, Figure 2
2. Designation of type and function of unit	Page 2
3. General dimensions, capacities and structural description of unit	Page 2, Figure 2
4. Dates that the unit operated	Page 2
5. Specification of all wastes that have been managed at/in the unit to the extent available	Page 3, Table 2
6. All available information pertaining to any release of hazardous waste or hazardous constituents from such units	Page 3, Attachment B

**NOTES:**

SAR - SWMU Assessment Report

SWMU - Solid Waste Management Unit



© 1999 DeLorme. Street Atlas USA

Mag 14.00  
Tue Jan 23 15:44 2001

Scale 1:31,250 (at center)

2000 Feet

1000 Meters

- Local Road
- Major Connector
- State Route

Columbus \*

Mississippi

**ERM-Southwest, Inc.**  
HOUSTON • NEW ORLEANS • AUSTIN • DALLAS • BEAUMONT

**FIGURE 1  
FACILITY LOCATION MAP**

**Kerr-McGee Chemical LLC  
Columbus, Mississippi**



DESIGN: BAC	CHKD.: BAC	DATE: 01/24/01	REV.:
DRAWN: MMH	SCALE: AS SHOWN	W.O.NO.: 515003A002 A01	

TABLE 2

## ANALYTICAL DATA FOR NEWLY IDENTIFIED SWMU

Kerr-McGee Chemical, LLC  
Columbus, Mississippi

<u>K001 Semivolatile Constituents</u>	<u>Concentration (mg/kg)</u>
2,3,4,6-Tetrachlorophenol	12 J
Phenol	13 J
2-Chlorophenol	26 U
2,4-Dimethylphenol	87
Naphthalene	2,000 E
4-Chloro-3-Methylphenol	26 U
2,4,6-Trichlorophenol	26 U
Acenaphthylene	490 E
2,4-Dinitrophenol	66 U
Pentachlorophenol	66 U
Phenanthrene	100,000 E
Fluoranthene	58,000 E
Benzo(a)anthracene	6,200 E
Benzo(b)fluoranthene	1,900 E
Benzo(a)pyrene	1,300 E
Indeno(1,2,3-cd)pyrene	1,200 E
Dibenz(a,h)anthracene	560 E
Carbazole	19,000 E

## NOTES:

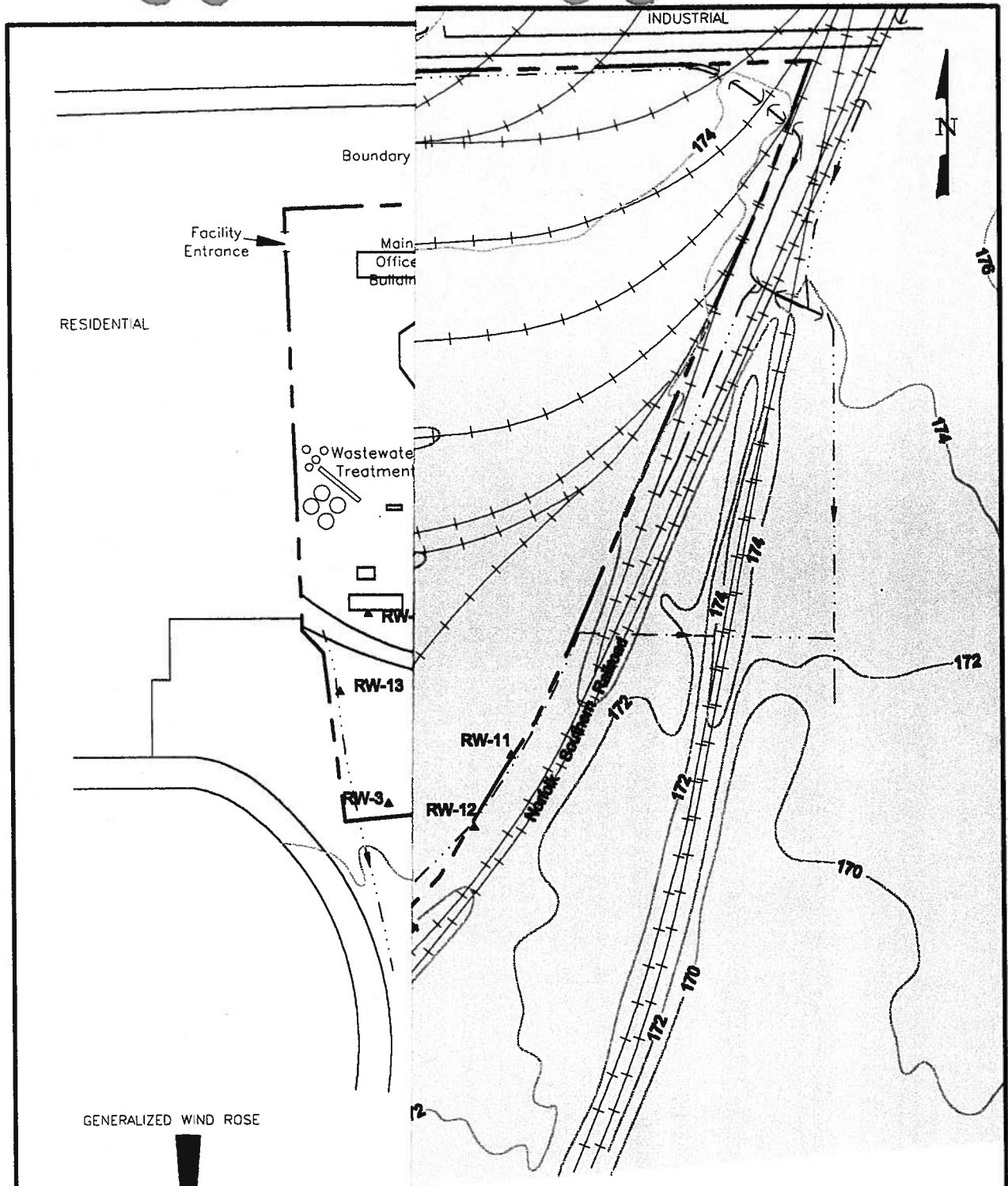
J - Estimated value; concentration is below limit of quantitation.

U - Not detected.

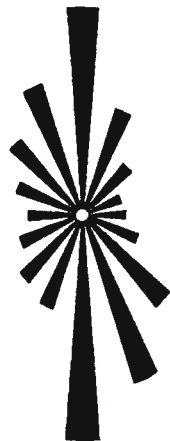
E - Compound exceeds calibration range.

Sample collected on September 26, 2000.





GENERALIZED WIND ROSE



0 100 200  
SCALE FEET

Source: Kerr-McGee Corp. Safety & Environmental Affairs drawing, dated 9/00.

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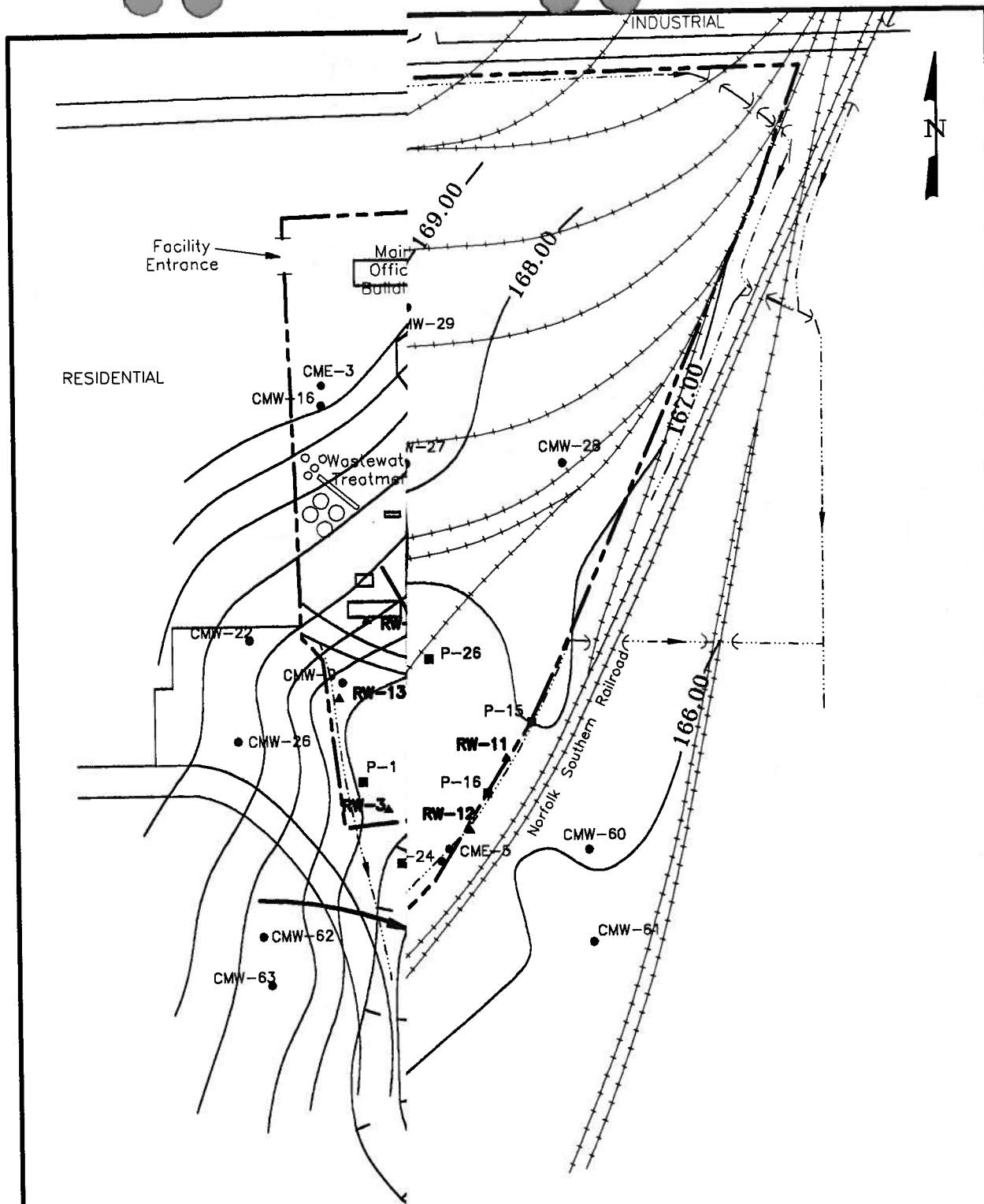
**FIGURE 2**  
**SITE FEATURES AS REQUIRED BY**  
**40 CFR 270.14(b)(18)**

Kerr-McGee Chemical LLC  
Columbus, Mississippi

DESIGN: BAC	CHKD: BAC	DATE: 01/24/01	REV:
DRAWN: MMH	SCALE: AS SHOWN	W.O.NO.: 515003B005 A01	



Location of Gauging Station: Tupelo, MS  
Time Period of Measurements: 1984-1992  
Source: Southern Region Climate Center



0 100 200  
SCALE FEET

Source: Kerr-McGee Corp. Safety & Environmental Affairs drawing, dated 9/00.

**ERM-Southwest, Inc.**  
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**FIGURE 3**  
**POTENTIOMETRIC SURFACE FOR**  
**ALLUVIAL FORMATION**  
May 15, 2000  
Kerr-McGee Chemical, LLC  
Columbus, MS



DESIGN: BAC	CHKD: BAC	DATE: 01/24/01	REV.:
DRAWN: MMH	SCALE: AS SHOWN	W.O.NO: 515003B006 A01	

## **Attachment 2**

**Environmental Resources Management**  
3501 North Causeway Boulevard, Suite 200  
Metairie, Louisiana 70002  
(504) 831-6700

[illegible]

KERR-McGEE CORPORATION Hydrology Dept. Engineering Services		FIRM SUBSIDIARY Columbus, Miss		LOCATION 200' west of B7		BORING NUMBER B8				
DEPTH IN FEET	LITHOLOGIC DESCRIPTION	GRAPHIC LOG	UNIFIED SOIL FIELD CLASS.	BLOWS PER FOOT	PID (ppm)	SOIL SAMPLE				REMARKS OR FIELD OBSERVATIONS
						NO.	TYPE	DEPTH	REC.	
5  <										

EXPLANATION	Water Table (24 Hour)	<b>GRAPHIC LOG LEGEND</b> CLAY SILT SAND GRAVEL SILTY CLAY CLAYEY SILT DEBRIS FILL LIGHT ORGANIC PEAT SANDY CLAY CLAYEY SAND	DATE DRILLED 9/21/89	PAGE 1 of 1
	Water Table (Time of Boring)		DRAWING METHOD Hollow Stem Auger	
	PID NO. TYPE Identifies Sample by Number Sample Collection Method		DRILLED BY J.L. Inc. - C. Lee	
	SPLIT-BARREL		LOGGED BY J.M. Poor	
	THIN-WALLED TUBE		EXISTING GRADE ELEVATION (FT AMSL)	
	AUGER		LOCATION OR GRID COORDINATES	
	CONTINUOUS SAMPLER			
	ROCK CORE			
	NO RECOVERY			
	DEPTH Depth Top and Bottom of Sample REC. Actual Length of Recovered Sample in Feet			

## SOIL BORING LOG 104-8885

KERR-McGEE CORPORATION Hydrology Dept. Engineering Services			KRM SUBSIDIARY Columbus Miss		LOCATION 300' N. of B10		BORING NUMBER B12			
DEPTH IN FEET	LITHOLOGIC DESCRIPTION	GRAPHIC LOG	UNIFIED SOIL FIELD CLASS.	BLOWS PER FOOT	PID (ppm)	SOIL SAMPLE				REMARKS OR FIELD OBSERVATIONS
						NO.	TYPE	DEPTH	REC.	
	Surface gravels				0	1	X	2.0	0	
	Silt: 7.5 yR 5/4 vfn sand, dry,			3	0	2	X	4.5	1.7	
5	Sand: 7.5 yR 5/4 vfn, pgrade, fria.			4	0	3	X	7.0	1.5	
	: 7.5 yR 7/4 vfn-fn, pgrade friable.			6	0	4	X	9.5	1.3	
	: 7.5 yR 5/6 subrd, med, grl, 1/2"			7	0	5	X	12.0	1.8	Black Stain - no odor Soil sample #1
10	: 7.5 yR 6/4 med-crs, ugrade, subang, gvl 1/2"			9	0	6	X	14.5	1.9	Cresote odor & stain
	: crs, subang 10 yR 7/4, pgrade,			11	0	7	X	17.0	1.9	Cresote odor & stain
15	Gravel: 70% 4/1" subang, 10 yR 7/1, chert, gtl, med-crs sand.			12	0	8	X	19.5	1.7	Cresote odor & stain
	Sand: 10 yR 7/1, fn-med, subrd, 5% crs.			5	0	9	X	22.0	2.5	Weathered Eutaw 21.1'
20	Gravel: subang, 4/1", clay lenses.			7	0	10	X	24.5	2.5	Eutaw Form, 2020
	Sand: vfn-med, subrd.			25	0					
	Gravel: 10% crs sand.			30	0					
	Sand: 10 yR 6/4 glauc, mica, vfn-med			30	0					
25	: 5 yR 7/4, mica, glauc, vfn-			25	0					
	Total Depth 24.5			40	0					

EXPLANATION	Water Table (24 Hour)			Water Table (Time of Boring)			PID NO. TYPE			Sample Collection Method			GRAPHIC LOG LEGEND			DATE DRILLED		PAGE	
SPLIT-BARREL THIN-WALLED TUBE AUGER CONTINUOUS SAMPLER ROCK CORE NO RECOVERY																9/22/89		of	
													DEBRIS FILL			DRILLING METHOD			
													HIGHLY ORGANIC (PEAT)			Hollow Stem Auger			
													SANDY CLAY			DRILLED BY			
													CLAYEY SAND			J.L.-C. Lee			
																LOGGED BY			
																J.M. Poor			
																EXISTING GRADE ELEVATION (FT AMSL)			
																LOCATION OR GRID COORDINATES			

DEPTH	REC.
Depth Top and Bottom of Sample	Actual Length of Recovered Sample in Feet

KERR-McGEE CORPORATION		KRM SUBSIDIARY		LOCATION		BORING NUMBER				
Hydrology Dept. Engineering Services		Columbus, Miss. EPA				B16				
DEPTH IN FEET	LITHOLOGIC DESCRIPTION	GRAPHIC LOG	UNIFIED SOIL FIELD CLASS.	BLOWS PER FOOT	PID (ppm)	SOIL SAMPLE				REMARKS OR FIELD OBSERVATIONS
						NO.	TYPE	DEPTH	REC.	
5	Sand, fine, H. orange									
6										
7										
8										
9										
10										
11										
12										
13										
14										
15	Green Gumbo									
16										
17										
18										
19										
20										
21										
22										
23										
24										
25	TD 24.5									
26										
27										
28										
29										
30										
31										
32										
33										
34										

**EXPLANATION**

▼ Water Table (24 Hour)

▽ Water Table (Time of Boring)

PID Photoionization Detection (ppm)

NO. Identifies Sample by Number

TYPE Sample Collection Method

SPLIT-BARREL

THIN-WALLED TUBE

AUGER

CONTINUOUS SAMPLER

ROCK CORE

NO RECOVERY

DEPTH Depth Top and Bottom of Sample

REC. Actual Length of Recovered Sample in Feet

**GRAPHIC LOG LEGEND**

CLAY	DEBRIS FILL
SILT	HIGHLY ORGANIC (PEAT)
SAND	SANDY CLAY
GRAVEL	CLAYEY SAND
SILTY CLAY	
CLAYEY SILT	

DATE DRILLED 5/24/90

PAGE 1 of 1

DRILLING METHOD Auger

DRILLED BY K. Pate

LOGGED BY J. Poor

EXISTING GRADE ELEVATION IFT AMSL

LOCATION OR GRID COORDINATES



# SOIL BORING LOG KM-5655-A

KERR-McGEE CORPORATION Hydrology Dept. Engineering Services			KM SUBSIDIARY KMCC - FPD		LOCATION Columbus, MISS		BORING NUMBER B17				
DEPTH IN FEET	LITHOLOGIC DESCRIPTION	GRAPHIC LOG	UNIFIED SOIL FIELD CLASS.	BLOWS PER FOOT	PID (ppm)	SOIL SAMPLE				REMARKS OR FIELD OBSERVATIONS	
						NO.	TYPE	DEPTH	REC.		
5	SURFACE GRAVEL FILL		ML-MH	10		1	X	2.5	2.0	POSSIBLE STAIN NO ODOR	
	SILT w/ CLAY 7.5 YR 4/2 GRADING TO SAND 7.5 YR 7/8 F-M GR, TR GRVL MOIST P-M GRD		GM	12		2	X	4.5	1.4		
	SILT: GRADING TO SAND AND		GM	14		3	X	7.0	1.9		
10	SAND: MID-CRS G, 10YR 8/2-6/6 w GRD, SAT, GRVL		GW	27		4	X	9.5	2.1		STAIN w/ CDOR
	10YR 7/2 F-M GR P-M GRD SM CLAYEY		GM	17		5	X	12.0	1.2		
	2.5 Y 7/8 F-CRS GR. w/ GRVL 60/40% W. GRD		GW	50		6	X	14.5	1.8		
15	2.5 Y 7/2, F-M GR TR CRS GRVL TO 1" +		GW	50		7	X	17.0	1.9		T/ WTR: ELEV 23.0'
	VF GR to CRS GR 10YR 5/4		SC	17		8	X	19.5	1.7		
	7.0 W CLAY LAMS		GW	50+		9	X	22.0	1.5		
20	10YR 5/4 to 8/1		ML	50+		10	X	24.5	1.8		T/ ELEV 28.6'
	SILT: VF G SDY. gy MOTT, mica 10YR 6/8 to 5/6		ML	50+		11	X	27.0	2.2		
	SILT: GRN gy VF SDY		ML	50+		12	X	29.5	2.1		
30	TOTAL DEPTH 29.5'										

**EXPLANATION**

Water Table (24 Hour)

Water Table (Time of Boring)

PID No. Type

SPUT. BARREL

AUGER

ROCK CORE

THIN-WALLED TUBE

CONTINUOUS SAMPLER

NO RECOVERY

DEPTH Depth Top and Bottom of Sample

REC. Actual Length of Recovered Sample in Feet

**GRAPHIC LOG LEGEND**

CLAY

SILT

SAND

GRAVEL

SILTY CLAY

CLAYEY SILT

DEBRIS FILL

HIGHLY ORGANIC PEAT

SANDY CLAY

CLAYEY SAND

DATE DRILLED: 7-30-90

DRILLING METHOD: HSA

DRILLED BY: TTL

LOGGED BY: J Grewford

EXISTING GRADE ELEVATION (FT AMSL):

LOCATION OR GRID COORDINATES:



KERR-McGEE CORPORATION Hydrology Dept. Engineering Services			KM SUBSIDIARY Columbus FPD		LOCATION On Site N. of CMW21		BORING NUMBER B26			
DEPTH IN FEET	LITHOLOGIC DESCRIPTION	GRAPHIC LOG	UNIFIED SOIL FIELD CLASS.	BLOWS PER FOOT	PID (ppm)	SOIL SAMPLE				REMARKS OR FIELD OBSERVATIONS
						NO.	TYPE	DEPTH	REC.	
5	Fill: gravels, silts, sand : cinders, oil, creosote Silt: 2.5YR 5/8, dns oil Silt: fn snd, 5YR 6/5, vfn snd		ML	36	0	1	X	2.5	0.7	Surface oils & creosote
	15			0	2	X	5.0	1.1		
	SP		17	0	3	X	7.0	1.6		
			16	0	4	X	9.5	2.1		
	SW		24	0	5	X	12.0	1.8	Stain	
			33	0	6	X	14.5	2.0		
	SM		60	0	7	X	17.0	1.9	Odor	
			48	0	8	X	19.5	1.8	Odor	
	GW		50	0	9	X	22.0	1.7	Odor	
			MH	62	0	10	X	24.5	2.1	
10	Sand: fn-med, p-grd, 5YR 7/3 : fn-med, 1% gvl < 1/4", rd									
15	: fn-med, 7.5R 4/4 : med-crs : 7.5YR 6/4, 10% gvl < 1/4", increase size : 7.5YR 7/2 med-crs, subrd, 30% gvl < 1/4" subrd, : silty 10YR 5/6 : med-vcrs, 40% gvl < 1/4" 10YR 5/6 : white, w/ 40% frac chert > 1/2" : vcrs - 80% gvl < 1/4" white gte, subrd.									
20	Gvl: < 1/4", 10% crs snd, subrd.									
	Weathered Eutaw, vfn snd, s.H.									
	Eutaw Formation 22.1 glauca, mica, silty, vfn snd, clay lns.									
	TD 24.5									

**EXPLANATION**

▼ Water Table (24 Hour)  
 ▽ Water Table (Time of Boring)  
 PID Photoionization Detection (ppm)  
 NO. Identifies Sample by Number  
 TYPE Sample Collection Method

SPLIT-BARREL  
 THIN-WALLED TUBE

AUGER  
 CONTINUOUS SAMPLER

ROCK CORE  
 NO RECOVERY

DEPTH Depth Top and Bottom of Sample  
 REC. Actual Length of Recovered Sample in Feet

**GRAPHIC LOG LEGEND**

CLAY  
 SILT  
 SAND  
 GRAVEL  
 SILTY CLAY  
 CLAYEY SILT

DEBRIS FILL  
 HIGHLY ORGANIC (PEAT)  
 SANDY CLAY  
 CLAYEY SAND

DATE DRILLED  
7/27/90

PAGE  
of

DRILLING METHOD  
HSA

DRILLED BY  
Ken Pate

LOGGED BY  
J. Pool

EXISTING GRADE ELEVATION (FT AMSL)

LOCATION OR GRID COORDINATES

# SOIL BORING LOG KM-5655-A

KERR-McGEE CORPORATION Hydrology Dept. Engineering Services			KM SUBSIDIARY Columbus FPD		LOCATION Off-Site SE of P6		BORING NUMBER B28			
DEPTH IN FEET	LITHOLOGIC DESCRIPTION	GRAPHIC LOG	UNIFIED SOIL FIELD CLASS.	BLOWS PER FOOT	PID (ppm)	NO.	TYPE	DEPTH	REC.	REMARKS OR FIELD OBSERVATIONS
5	Silt: 5yR 4/2, dry, rootlets	[Hand-drawn soil profile with dots and lines]	ML	21	0	1	X	2.5	0.8	
	: 5yR 5/6 dry,									
	Sand: fn-vfn, moist		SP	9	0	2	X	5.0	1.9	
10	Silt: 1fn sand	[Hand-drawn soil profile with dots and lines]	ML	10	0	3	X	7.0	1.5	
	Sand: 5yR 8/1, vfn-fn, subrd		SP	10	0	4	X	9.5	1.9	
	: 5yR 6/4, fn-vfn, subrd									
15	pgrd	[Hand-drawn soil profile with dots and lines]	SW	19	0	5	X	12.0	1.8	Stain/odor black
	: med-crs, 5yR 4/3, subrd									
	: 10% gvl, 2 1/4"		SW	46	0	6	X	14.5	1.6	stain/odor
20	Gvl: 90% < 1/4" subang, med-crs sand, 7.5yR 7/4 fract chert.	[Hand-drawn soil profile with dots and lines]	SW	24	0	7	X	17.0	1.5	stain/odor
	Sand: fn-med									
	Gvl: < 1/4", 20% > 1/2", subrd fract chert		SP	36	0	8	X	19.5	1.8	
25	Sand: vcrs, w/gvl < 1/4" 7.5yR 8/2	[Hand-drawn soil profile with dots and lines]	SM	55	0	9	X	22.0	1.3	
	Weathered Eutaw 18.5									
	: 2.5y 6/2, clay lense, vfn sand									
30	: mica, biotite, clay varves	[Hand-drawn soil profile with dots and lines]								
	Silt: 5yR 6/8,									
	: sandy silt									
Eutaw Formation 23.5			MH	46	0	10	X	24.5	2.3	
TD 24.5'										

EXPLANATION

- Water Table (24 Hour)
- Water Table (Time of Boring)
- Photoionization Detection (ppm)
- Identifies Sample by Number
- Sample Collection Method
- SPLIT-BARREL
- AUGER
- ROCK CORE
- THIN-WALLED TUBE
- CONTINUOUS SAMPLER
- NO RECOVERY
- DEPTH: Depth Top and Bottom of Sample
- REC.: Actual Length of Recovered Sample in Feet

## GRAPHIC LOG LEGEND

- CLAY
- SILT
- SAND
- GRAVEL
- SILTY CLAY
- CLAYEY SILT
- DEBRIS FILL
- HIGHLY ORGANIC (PEAT)
- SANDY CLAY
- CLAYEY SAND

DATE DRILLED 7/30/90	PAGE 1 of 1
DRILLING METHOD HSA	
DRILLED BY Ken Pate - TIL	
LOGGED BY JM Poor	
EXISTING GRADE ELEVATION (FT AMSL)	
LOCATION OR GRID COORDINATES	



McLean.Russ@epamail.epa.gov on 03/05/2001 12:42:24 PM

To: Louis\_Crawford@deq.state.ms.us  
cc:  
Subject: Kerr-McGee Columbus, Draft Permit

Louis,

EPA has no comments on the draft RCRA permit for the Kerr-McGee, Columbus, MS facility.

Russ McLean  
RCRA Programs Branch

# PHONE CONVERSATION RECORD

Spoke to STEVE LADNER

Date 27 FEB 01 Time 10:55 am

Of KERR MCGEE

Phone No. 405 270 2625

☒ I placed call ☐ Party called

☒ My ☐ Party's Message

AWAITING COMMENTS ON RCRA Permit due 26 FEB 01.

Left message -

☐ My ☒ Party's Response

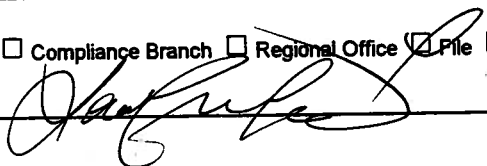
~~Left message~~

NONE

Action / Follow-up needed

Refer to ☐ Compliance Branch ☐ Regional Office ☒ File ☐ Other

Signed





STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

January 22, 2001

CERTIFIED MAIL No. 7099 3400 0014 1712 1500

Mr. Stephen A. Ladner  
Staff Environmental Scientist  
Kerr-McGee Chemical, LLC  
Forest Products Division  
P.O. Box 25861  
Oklahoma City, OK 73125

**FILE COPY**

Dear Mr. Ladner:

Re: Transmittal of Draft RCRA Permit ④  
Kerr-McGee Chemical LLC  
Forest Products Division  
Columbus, Lowndes County  
MSD 990 866 329

Enclosed for your review is a preliminary draft of the referenced permit. Please provide any comments you may have on this document (or confirm that you have no comments) no later than February 26, 2001. We anticipate initiating the required 45 day public comment period on or about March 19, 2001.

If you have any questions, please call me at (601) 961-5117.

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

enclosure

pc: Mr. Russ McLean, U.S. EPA Region 4 (w/ enc.)

d22:draft-01



STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR  
January 17, 2001

Mr. Stephen A. Ladner  
Staff Environmental Scientist  
Kerr-McGee Chemical, LLC  
Forest Products Division  
P.O. Box 25861  
Oklahoma City, OK 73125

FILE COPY

Dear Mr. Ladner:

Re: RCRA Permit Application  
Kerr-McGee Chemical, LLC  
Forest Products Division - Columbus Facility  
Columbus, Lowndes County  
MSD 990 866 329

The Mississippi Office of Pollution Control has completed its review of the referenced document and has determined that the application is complete and adequate. The draft permit is preparation, and we anticipate initiating the required 45 day public comment period in March. Prior to this time, a copy of the draft permit will be transmitted to your for further review and comment. You may also submit comments during the Pubic Comment period, but if major modifications are necessary an additional comment period may be required.

If you have any questions, please call me at 601-961-5117.

Sincerely,

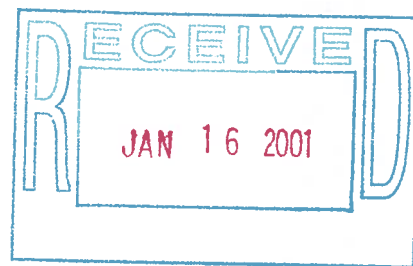
Louis Crawford, P.E.  
Environmental Permits Division

cc: Mr. Nick Bock, KMC-LLC  
Mr. Russ McLean, EPA Region 4

d22/RCRA/complete



**KERR-McGEE CHEMICAL LLC**  
KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125



January 12, 2000

Mr. Louis Crawford, PE  
Environmental Permits Division  
Mississippi Department of Environmental Quality  
Post Office Box 10385  
Jackson, Mississippi 39289-0385

Re: RCRA Permit Application Revision 2 - Comments  
Kerr-McGee Chemical LLC  
Forest Products Division - Columbus Facility  
Columbus, Lowndes County  
MSD 990 866 329

Dear Mr. Crawford,

Kerr-McGee Chemical LLC received your RCRA Part B Revision 2 comment letter on December 14, 2000. This letter serves as a response to your comment letter. This letter will respond to each comment.

Please review the enclosed responses and revised application, feel free to contact me, Steve Ladner at (405) 270-2625 if you have any further questions or needs. Thank you for your time and consideration in this matter.

Sincerely,

KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION

Stephen A. Ladner  
Staff Environmental Specialist

Cc: Nick Bock, KMC LLC  
Ron Murphey, KMC LLC - Columbus  
Russ McLean, US EPA Region IV



## KMC LLC RESPONSE TO MISSDEQ COMMENTS

- 1) KMC LLC stated in a letter dated October 6, 2000 that monitor wells CMW3, CMW11, and CMW19 are scheduled for replacement. KMC LLC understands the most expedient solution for permitting is to incorporate these modifications into the permit reissuance process. Therefore, KMC LLC has taken the following steps:
  - a) Page 29 in the Groundwater Monitoring of Section 3, has been changed to reflect the new wells as replacement wells designated as CMW-3R, CMW-11R, and CMW-19R.
  - b) The text on page 30, Section 3 states that the new replacement wells are listed as effectiveness wells.
  - c) The well map in Appendix D have been changed to reflect the replacement wells
- 2) KMC LLC has included as an attachment, a slip-sheet referencing that Appendix I is not utilized in this application.
- 3) KMC LLC corrected the typographical error and has had the certification sheet re-signed on page 8.
- 4) KMC LLC has provided a corrected page 10 to reflect the Solid Waste Management Area II is actually the same as Solid Waste Management Area 2.
- 5) KMC LLC corrected page 22 to reflect that the post-closure care started in spring 1987, and provide a revised page.
- 6) KMC LLC has provided more detailed illustrations of where the individual SWMU's are within the SWMA's. These are contained in Appendix D.
  - a) KMC LLC has also inserted in Appendix D a map showing only the corrective action items at the facility. These would be either recovery trenches or recovery wells.



RECEIVED  
MAR 23 2003  
MDEQ

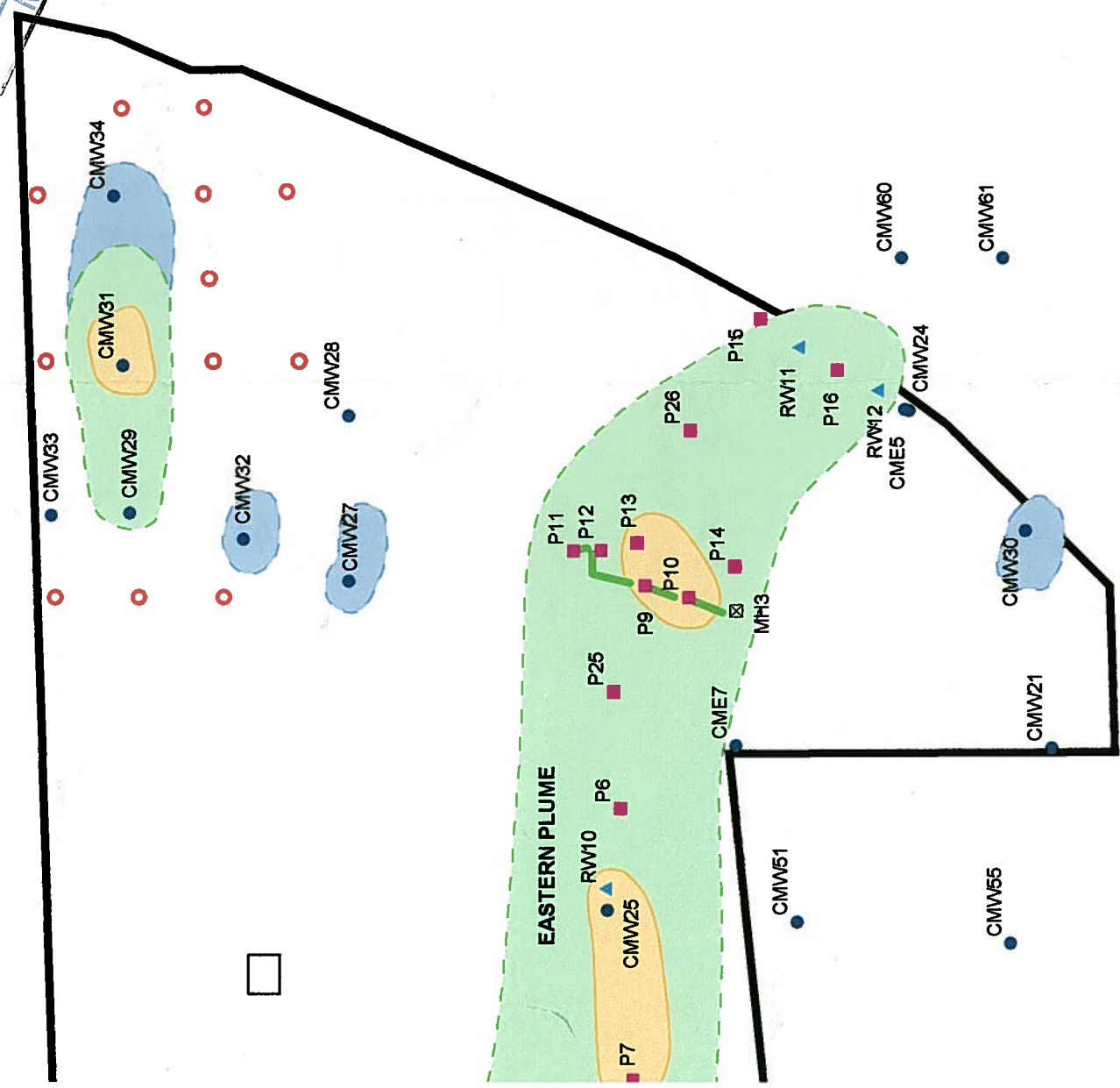


FIGURE 1  
DELINEATION OF CONTAMINATION  
PLUME - 11/5/02 WITH  
PROPOSED GEOPROBE LOCATIONS



Kerr-McGee Corporation

COLUMBUS FACILITY  
KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION

Date: 3/03

Drawn By: KB

