

GRENADA COUNTY - TIE PLANT MS
KOPPERS INC
COMPLIANCE
MSD007027543
1990-----1991

AI 00876

Koppers Inc

General Information

ID	Branch	SIC	County	Basin	Start	End
876	Energy and Transportation	2491	Grenada	Yazoo River	11/09/1981	

Address

Physical Address (Primary)	Mailing Address
1 Koppers Drive Tie Plant, MS 38960	PO Box 160 Tie Plant, MS 38960

Telecommunications

Type	Address or Phone
Work phone number	(662) 226-4584, Ext. 11

Alternate / Historic AI Identifiers

Alt ID	Alt Name	Alt Type	Start Date	End Date
2804300012	Koppers Inc	Air-AIRS AFS	10/12/2000	
096000012	Koppers, Inc.	Air-Title V Fee Customer	12/11/2006	
096000012	Koppers Industries, Inc.	Air-Title V Operating	03/11/1997	03/01/2002
096000012	Koppers Industries, Inc.	Air-Title V Operating	01/13/2004	03/26/2007
096000012	Koppers Inc	Air-Title V Operating	03/26/2007	01/01/2009
MSR220005	Koppers Industries, Inc.	GP-Wood Treating	09/25/1992	
MSD007027543	Koppers Industries, Inc.	Hazardous Waste-EPA ID	08/27/1999	
HW8854301	Koppers Industries, Inc.	Hazardous Waste-TSD	06/28/1988	06/28/1998
HW8854301	Koppers Industries, Inc.	Hazardous Waste-TSD	11/10/1999	03/26/2007
HW8854301	Koppers, Inc. (Owner)	Hazardous Waste-TSD	03/26/2007	09/30/2009
876	Koppers Industries, Inc.	Historic Site Name	11/09/1981	12/11/2006
876	Koppers, Inc.	Official Site Name	12/11/2006	
MSP090300	Koppers Industries, Inc.	Water-Pretreatment	11/14/1995	11/13/2000
MSP090300	Koppers Industries, Inc.	Water-Pretreatment	09/18/2001	08/31/2006
MSP090300	Koppers Inc	Water-Pretreatment	03/26/2007	02/28/2012
MSU081080	Koppers Industries, Inc.	Water-SOP	11/09/1981	11/30/1985

Regulatory Programs

Program	SubProgram	Start Date	End Date
Air	Title V - major	06/01/1900	
Hazardous Waste	Large Quantity Generator	08/27/1999	
Hazardous Waste	TSD - Not Classified	06/28/1988	
Water	Baseline Stormwater	01/01/1900	
Water	PT CIU	11/14/1995	
Water	PT CIU - Timber Products Processing (Subpart 429)	11/14/1995	
Water	PT SIU	11/14/1995	

Locational Data

Latitude	Longitude	Metadata	S / T / R	Map Links

33 ° 44 ' 3 .00 (033.734167)	89 ° 47 ' 8 .06 (089.785572)	Point Desc: PG- Plant Entrance (General). Data collected by Mike Hardy on 11/8/2005. Elevation 223 feet. Just inside entrance gate. Method: GPS Code (Psuedo Range) Standard Position (SA Off) Datum: NAD83 Type: MDEQ	Section: Township: Range:	SWIMS TerraServer Map It
---------------------------------	---------------------------------	---	---------------------------------	--------------------------------

4/3/2007 12:58:30 PM



Mississippi Department of Environmental Quality
Office of Pollution Control

I-sys 2000 Master Site Detail Report

Site Name: Koppers Industries Inc

<u>PHYSICAL ADDRESS</u> LINE 1: Tie Plant Road LINE 2: LINE 3: MUNICIPALITY: Tie Plant STATE CODE: MS ZIP CODE: 38960- <u>MAILING ADDRESS</u> LINE 1: PO Box 160 LINE 2: LINE 3: MUNICIPALITY: Tie Plant STATE CODE: MS ZIP CODE: 38960-	<u>OTHER INFORMATION</u> MASTER ID: 000876 COUNTY: Grenada REGION: NRO SIC 1: 2491 AIR TYPE: TITLE V HW TYPE: TSD SOLID TYPE: WATER TYPE: INDUSTRIAL BRANCH: Energy ECED CONTACT: Collier, Melissa BASIN:
<u>AIR PROGRAMS</u> <input checked="" type="checkbox"/> SIP <input type="checkbox"/> PSD <input type="checkbox"/> NSPS <input type="checkbox"/> NESHAPS <input type="checkbox"/> MACT	



**Mississippi Department of Environmental Quality
Office of Pollution Control**

Permits

PROGRAM	PERMIT TYPE	PERMIT #	MDEQ PERMIT CONTACT	ACTIVE
AIR	TITLE V	096000012	Burchfield, David	YES
WATER	PRE-TREATMENT	MSP090300	Collins, Bryan	YES
HAZ. WASTE	TSD	HW8854301		YES
HAZ. WASTE	EPA ID	MSD007027543		YES
HAZ. WASTE	TSD	HW8854301	Stover, Wayne	YES

Compliance Actions

MEDIA	ACTIVITY TYPE	SCHEDULED	COMPLETED	INSPECTED B
HAZ WASTE	Financial Record Review	1/18/00	1/18/00	Twitty, Russ
WATER	CMI - PRETREATMENT			Whittington, Darryail
WATER	CEI - PRETREATMENT	9/30/00		Twitty, Russ
WATER	CEI - NA	9/30/00		Twitty, Russ
HAZ WASTE	Compliance Evaluation Inspection	9/30/00		Twitty, Russ
AIR	State Compliance Inspection	9/30/00		Twitty, Russ
WATER	CEI - NA	3/2/99	3/2/99	Twitty, Russ
HAZ WASTE	Compliance Evaluation Inspection	3/2/99	3/2/99	Twitty, Russ
AIR	State Compliance Inspection	3/2/99	3/2/99	Twitty, Russ



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

JUN - 6 1991

June 5, 1991

FEDERAL EXPRESS

Mr. Stephen Spengler
Mississippi Department of
Natural Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, Mississippi 39204

Re: Koppers Industries, Inc.
Grenada, Mississippi Facility
EPA I.D. No. MSD 007 027 543

Dear Mr. Spengler:

As a result of the newly-effective hazardous waste listings for the wood preserving industry, enclosed please find a copy of the revised Part A for the above-referenced facility.

Sincerely,

Jane M. Patarcity
Program Manager-Environmental Services

JMP/jls
Enclosure

cc: R. Hamilton
B. Nolan
J. Batchelder (KII)
J. Clayton (KII)
J. Scarbrough (U.S. EPA Region IV)



OPERATOR #1

KOPPERS INDUSTRIES, INC.
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 227-2001

Status of Operator #1: P

OPERATOR #2

BEAZER EAST, INC.
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 227-2430

Status of Operator #2: P

****NOTE:** Operator #2 is not involved in the operation of the container storage facility (S03) located at the facility, and therefore, all obligations under the relevant statutes and regulations pertaining thereto, including, but not limited to any and all financial assurance requirements, are solely those of Operator #1.

REGION IV POSITION PAPER
ISSUANCE OF MORE THAN ONE EPA
IDENTIFICATION NUMBER AT A FACILITY

The purpose of this paper is to establish the position that each facility subject to regulation under the Resource Conservation and Recovery Act (RCRA), receive only one EPA Identification Number, regardless of whether the facility is owned and operated by one or more companies.

RECOMMENDATION: Each facility subject to RCRA regulation should receive only one EPA Identification Number for the operational facility, regardless of ownership or operational control.

BACKGROUND: Recently EPA Region IV received a proposal from Beazer Materials and Services, Inc. (BMS) in which they proposed that each RCRA facility acquired by BMS through a takeover of Koppers Co., Inc. (Koppers), then subsequently sold to Koppers Industries, Inc. (KII), be given two EPA Identification Numbers. One number would be issued to KII and one to BMS. BMS bases their proposal on a contractual agreement which BMS and KII entered into at the time of the sale. This proposal includes a number of facilities within Region IV. A more detailed breakdown of the corporate transactions and proposal is attached.

BASIS: In F.R. 33069, May 19, 1980, EPA stated that the plant, not the parent company, is the generator as defined in 40 C.F.R. Part 260.10. Specifically the regulations define generator as "...any person, by site..."

40 C.F.R. Part 270.2 defines Hazardous Waste Management Facility as "... all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste." The BMS proposal seeks to remove portions of facilities (the process areas) which operated as one Hazardous Waste Management Facility and provide them with new ID numbers. These new facilities would only be generators and therefore not subject to the permitting requirements.

40 C.F.R. Part 260.10 defines individual generation site as "... contiguous site..." which "...may have one or more sources of hazardous waste but is considered a single generation site if the site or property is contiguous." The KII properties are contiguous and therefore single generation sites, regardless of whether the wastes generated come from KII's operation of the process areas or from BMS' operation and closure of the RCRA regulated units.

BMS is an operator as defined in 40 C.F.R. Part 260.10 in that they will be the person responsible for the operation of the facilities.

KII is an owner as defined in 40 C.F.R. Part 260.10 in that they are the person who owns the facilities. In addition KII may be an operator of the RCRA facilities if they undertake operational or maintenance activities at the RCRA facilities. The BMS proposal does not address corrective action at these facilities, it merely provides for

post-closure care, therefore KII may be required along with BMS to address corrective action at each site.

Process areas are generally considered to contain several Solid Waste Management Areas.

The corrective action authority under 3008(h) provides for corrective action at facilities which were subject to interim status. This authority includes facilities, subject to the interim status provisions which have not received final administrative disposition of their permit (i.e. a final RCRA permit or denial of a final RCRA permit). Establishing process areas as separate generators would render those facilities no longer subject to the interim status requirements and therefore remove the Agency's ability to potentially seek corrective action pursuant to 3008(h) for the entire property.

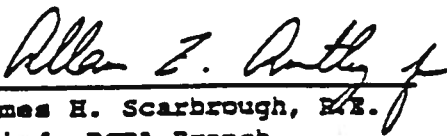
The corrective action authority under 3004(u) and (v) provides for corrective action at permitted facilities. If the process areas are not required to seek permits as generators, then the authority under 3004(u) and (v) may not be used to require corrective action.

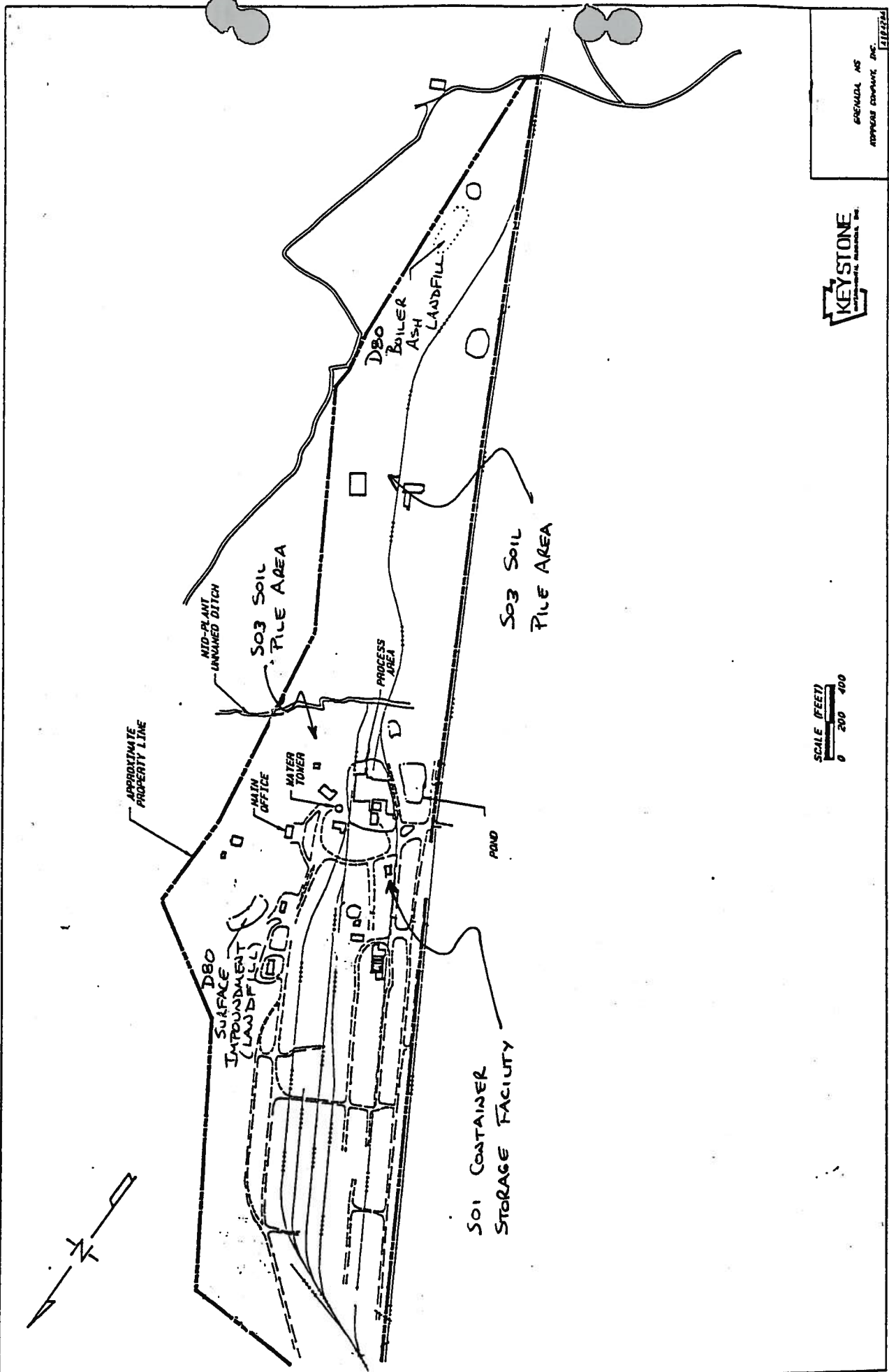
Issuance of one ID number to these facilities is consistent with EPA's handling of Government Owned/Contractor Operated (GOCO) facilities. GOCO's receive only one ID number regardless of the number of different operators at the site.

Alabama and Kentucky have also determined that one ID number is appropriate at these facilities. Mississippi, however, has issued two ID numbers to the site in Grenada, Mississippi.

CONCLUSION: BMS and KII should submit amended Part A permit applications naming KII as the owner of each facility and BMS and KII as the operators of each facility. This will be consistent with the regulations and definitions in 40 C.F.R. and will ensure that the Agency may require corrective action for all solid waste management units at the facilities in question.

CONCURRENCE:


James H. Scarbrough, R.E.
Chief, RCRA Branch
Waste Management Division



SCALE (FEET)
0 200 400



REVISED AS
APPROVED COMPANY, INC.
11/18/2014

For EPA Regional Use Only Date Received Month Day Year <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	 United States Environmental Protection Agency Washington, DC 20460 <h1 style="margin: 10px 0;">Hazardous Waste Permit Application</h1> <h2 style="margin: 10px 0;">Part A</h2> <p style="color: gray;">(Read the Instructions before starting)</p>	For State Use Only <div style="border: 1px solid black; height: 100px; width: 100%;"></div>
---	--	---

I. ID Number(s)

A. EPA ID Number	B. Secondary ID Number (if applicable)
M S D 0 0 7 0 2 7 5 4 3	

II. Name of Facility

K O P P E R S I N D U S T R I E S I N C .

III. Facility Location (Physical address not P.O. Box or Route Number)

A. Street
 H I G H W A Y 5 1
Street (continued)
 T I E P L A N T R O A D
City or Town
 T I E P L A N T
State **ZIP Code**
 M S 3 8 9 6 0 -

County Code (if known) **County Name**
 G R E N A D A

B. Land Type	C. Geographic Location	D. Facility Existence Date
(enter code) P	LATITUDE (degrees, minutes, & seconds) 3 3 4 4 0 4 LONGITUDE (degrees, minutes, & seconds) 8 9 4 7 1 9	Month Day Year 1 9 8 0

IV. Facility Mailing Address

Street or P.O. Box
 B O X 1 6 0
City or Town
 T I E P L A N T
State **ZIP Code**
 M S 3 8 9 6 0 -

V. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (last)	(first)
C L A Y T O N	J O S E P H
Job Title	Phone Number (area code and number)
P L A N T M A N A G E R	6 0 1 - 2 2 6 - 4 5 8 4

VI. Facility Contact Address (See instructions)

A. Contact Address	B. Street or P.O. Box
Location Mailing X	
City or Town	State ZIP Code

M S D 0 0 7 0 2 7 5 4 3

The Plant deals with the preservation of wood products utilizing pressure treatment process. The preservation process utilizes pentachlorophenol and coal tar base products. Beazer East, Inc. does not commercially operate at this facility.

- 6 1991

XII. Process - Codes and Design Capacities

- A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in item XIII.
- B. PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process:
- 1. AMOUNT** - Enter the amount; in a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process-unit.
 - 2. UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measurement. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used for each process.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE	UNIT OF MEASURE CODE
	<u>DISPOSAL:</u>		GALLONS	G
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS PER HOUR	E
D80	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER DAY	U
D81	LAND APPLICATION	ACRES OR HECTARES	LITERS	L
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS PER HOUR	H
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER DAY	V
	<u>STORAGE:</u>		SHORT TONS PER HOUR	D
S01	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS	METRIC TONS PER HOUR	W
S02	TANK	GALLONS OR LITERS	SHORT TONS PER DAY	N
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS	METRIC TONS PER DAY	S
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS	POUNDS PER HOUR	J
	<u>TREATMENT:</u>		KILOGRAMS PER HOUR	R
T01	TANK	GALLONS PER DAY OR LITERS PER DAY	CUBIC YARDS	Y
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	CUBIC METERS	C
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR	ACRES	B
			ACRE-FEET	A
			HECTARES	Q
			HECTARE-METER	F
			BTU's PER HOUR	K
T04	OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY		

EPA Hazardous Waste Number (enter in column A)												EPA Hazardous Waste Number (enter in column A)											
M	S	D	0	0	7	0	2	7	5	4	3												

Waste Characterization of Hazardous Waste:

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart E of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart E, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item XIV-D(1).
- Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form (D(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in the numbers X-1, X-2, X-3, and X-4 below): A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS									
				(1) PROCESS CODES (enter)						(2) PROCESS DESCRIPTION (If a code is not entered in D(1))			
X 1	K 0 5 4	900	P	T	0	3	D	8	0				
X 2	D 0 0 2	400	P	T	0	3	D	8	0				
X 3	D 0 0 1	100	P	T	0	3	D	8	0				
X 4	D 0 0 2												Included With Above

EPA Form 8700-23 (01-90)

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

MAY 23 1991

5-28-91
NLS
JW

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

M S D 0 0 7 0 2 7 5 4 3

II. Name of Installation (Include company and specific site name)

K O P P E R S I N D U S T R I E S I N C . G R E N A D A

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

T I E P L A N T R O A D

Street (continued)

City or Town

T I E P L A N T

State

ZIP Code

M S 3 8 9 6 0 -

County Code

County Name

0 4 3 G R E N A D A

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

S A M E

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

C I A Y T O N

(first)

J D

Job Title

P L A N T M A N A G E R

Phone Number (area code and number)

6 0 1 - 2 2 6 - 4 5 8 4

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing☒

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

K O P P E R S I N D U S T R I E S I N C .

Street, P.O. Box, or Route Number

4 3 6 S E V E N T H A V E

City or Town

P I T T S B U R G H

State

ZIP Code

P A 1 5 2 1 9 - 1 8 0 0

Phone Number (area code and number)

4 1 2 - 2 2 7 - 2 0 0 1

B. Land Type

C. Owner Type

D. Change of Ownership (Date Changed)

Indicate by Yes or No

Yes X No

Month Day Year

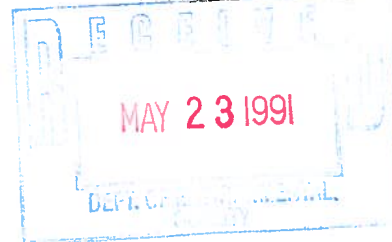
1 2 2 9 8 8

via FEDERAL EXPRESS

Telephone: (412) 227-2001
FAX: (412) 227-2423

May 22, 1991

Division of Solid and Waste Management
Bureau of Pollution Control
Department of Natural Resources
P. O. Box 10385
2380 Highway 80 West
Jackson, MS 39209



Re: NOTIFICATION OF REGULATED WASTE ACTIVITY

Enclosed is one copy of the EPA Form 8700-12 for the Koppers Industries, Inc. plant at Tie Plant, Mississippi. The industrial boiler at this location is currently burning wood preserving process wastes which, after the effective date of June 6, 1991, will be listed hazardous wastes F032 and F034. This notification is also for the container storage facility which is now storing non-RCRA wastes which will be newly regulated hazardous wastes after June 6, 1991.

Please call me at (412)227-2677 or J. D. Clayton, the plant manager, at (601)226-4584 if you have questions.

Sincerely,

Stephen T. Smith,
Environmental Program Manager

cc: U. S. EPA Region 4
Hazardous Waste Management Division
345 Courtland Street, NE
Atlanta, GA 30365

J. D. Clayton, Grenada, MS
Bill Donley, K-1750
J. R. Batchelder, K-1700
Jane Patarcity, K-1450
Ray Ohlis, K-1750



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

May 28, 1991

Koppers Industries, Inc - Grenada
Tie Plant Road
Tie Plant, MS 38960

Attn: J. D. Clayton

Re: Large Quantity Generator

This letter acknowledges receipt of your subsequent notification form as a Mississippi Large Quantity Generator.

The location identification number, MSD007027543, is assigned to:

Tie Plant Road

The above location with its assigned number is now designated as a Large Quantity Generator in our files. It is suggested that you secure and become familiar with Hazardous Waste Regulations, especially the chapter dealing with Large Quantity Generators. Your identification number must be used when manifesting any hazardous waste.

It is important that this office be notified in writing within seven (7) days of ANY changes of the information submitted on your notification form.

Should you have any questions please contact this office at (601) 961-5171.

Very truly yours,

Michael J. Weaver
Hazardous Waste Division

Enclosure



Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

REC'D

022090

February 16, 1990

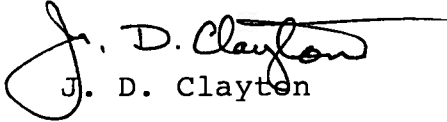
Mississippi Division of Solid and Waste Management
Department of Natural Resources
Bureau of Pollution Control
P. O. Box 10385
Jackson, Ms. 39289-0385

Dear Sir or Madam:

The completed 1989 Hazardous Waste Report for Koppers Industries, Inc., Grenada, Mississippi facility is enclosed.

If you have any questions regarding this submission, please feel free to contact me at the above number.

Sincerely,


J. D. Clayton

JDC/jrb
Enclosure

CC: Steve Smith K-1800
W. R. Donley K-1750

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. First Notification ☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

M S D 0 0 7 0 2 7 5 4 3

II. Name of Installation (Include company and specific site name)

K O P P E R S I N D U S T R I E S , I N C .

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

G R E N A D A P L A N T

Street (continued)

T I E P L A N T R O A D

City or Town

T I E P L A N T

State

ZIP Code

M S 3 8 9 6 0 -

County Code

County Name

G R A G R E N A D A

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

P O B O X 1 6 0

City or Town

T I E P L A N T

State

ZIP Code

M S 3 8 9 6 0 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

C L A Y T O N

(first)

J . D .

Job Title

P L A N T M G R

Phone Number (area code and number)

6 0 1 - 2 2 6 - 4 5 8 4

VI. Installation Contact Address (See instructions)

A. Contact Address

Location

Mailing

☐ ☒

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

K O P P E R S I N D U S T R I E S I N C .

Street, P.O. Box, or Route Number

4 3 6 S E V E N T H A V E K - 1 7 0 1

City or Town

P I T T S B U R G H

State

ZIP Code

P A 1 5 2 1 9 -

Phone Number (area code and number)

4 1 2 - 2 2 7 - 2 6 7 7

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

X

(Date Changed)

Month

Day

Year

Sec. VI	Generator Sta
A. 1989 generation (CHECK ONE BOX BELOW) Instruction page 8	B. Reason for not generating (CHECK ALL THAT APPLY) Page 10
<input type="checkbox"/> 1 No (CONTINUE TO BOX B) <input checked="" type="checkbox"/> 2 LQG <input type="checkbox"/> 3 SQG (SKIP TO SEC. VII) <input type="checkbox"/> 4 CESQG	<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <input type="checkbox"/> 1 Never generated <input type="checkbox"/> 2 Out of business <input type="checkbox"/> 3 Only excluded or delisted waste </div> <div style="width: 35%;"> <input type="checkbox"/> 4 Only non-hazardous waste <input type="checkbox"/> 5 Periodic or occasional generat <input type="checkbox"/> 6 Waste minimization activity <input type="checkbox"/> 7 Other (SPECIFY IN COMMENT </div> </div>

Sec. VII	On-Site Waste Management Status	
A. Storage Instruction page 11	B. RCRA treatment, recycling, or disposal Page 11	C. RCRA-exempt treatment, recycling, or disposal Page 12
11	2	2

Sec. VIII	Waste Minimization Activity during 1988 or 1989	
A. Did this site begin or expand a <u>source reduction</u> activity during 1988 or 1989? Instruction page 12	B. Did this site begin or expand a <u>recycling</u> activity during 1988 or 1989? Page 13	C. Did this site conduct a <u>source reduction or recycling opportunity assessment</u> during 1988 or 1989? Page 13
<input checked="" type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No	<input checked="" type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No	<input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No
D. What factors have limited this site from initiating new <u>source reduction</u> activities during 1988 or 1989? (CHECK ALL THAT APPLY) Page 13		
<input checked="" type="checkbox"/> 01 No factors have limited new source reduction activities. <input type="checkbox"/> 02 Insufficient capital to install new source reduction equipment or implement new source reduction practices. <input type="checkbox"/> 03 Lack of technical information on source reduction techniques applicable to the specific production processes. <input type="checkbox"/> 04 Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment. <input type="checkbox"/> 05 Concern that product quality may decline as a result of source reduction. <input type="checkbox"/> 06 Technical limitations of the production processes. <input type="checkbox"/> 07 Permitting burdens. <input type="checkbox"/> 08 Other (SPECIFY IN COMMENTS)		
E. What factors have limited this site from initiating new on-site or off-site <u>recycling</u> activities during 1988 or 1989? (CHECK ALL THAT APPLY) Page 13		
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input checked="" type="checkbox"/> 01 No factors have limited new recycling activities. <input type="checkbox"/> 02 Insufficient capital to install new recycling equipment or implement new recycling practices. <input type="checkbox"/> 03 Lack of technical information on recycling techniques applicable to this site's specific production processes. <input type="checkbox"/> 04 Recycling not economically feasible: cost savings in waste management or production will not recover the capital investment. <input type="checkbox"/> 05 Concern that product quality may decline as a result of recycling. <input type="checkbox"/> 06 Requirements to manifest wastes inhibit shipments off site for recycling. </div> <div style="width: 48%;"> <input type="checkbox"/> 07 Financial liability provisions inhibit shipments off site for recycling. <input type="checkbox"/> 08 Technical limitations of product processes inhibit shipments off site for recycling. <input type="checkbox"/> 09 Technical limitations of production processes inhibit on-site recycling. <input type="checkbox"/> 10 Permitting burdens inhibit recycling. <input type="checkbox"/> 11 Lack of permitted off-site recycling facilities. <input type="checkbox"/> 12 Unable to identify a market for recyclable materials. <input type="checkbox"/> 13 Other (SPECIFY IN COMMENTS) </div> </div>		

Comments: Koppers Industries has a commitment to both source reduction and recycling of wastes. Efforts include operation of oil water separators to recover preservatives for return to process recovery and remixing of settled preservative in tanks, and use of non-usable process residuals as fuel additive in industrial boilers.

BEFORE COPYING FORM, ATTACH IDENTIFICATION LABEL
OR ENTER:

SITE NAME Koppers Industries, Inc.
Highway 51 South
Tie Plant, Ms. 38960

EPA ID NO. MISID101071012715143



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1989 Hazardous Waste Report

FORM
GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I A. Waste description Bottom sediment sludge from treatment of wastewater from wood preserving process that use creosote and/or pentachlorophenol
Instruction Page 15

B. EPA hazardous waste code
Page 16

K10101

C. State hazardous waste code
Page 16

K001

D. SIC code
Page 16

2491

E. Source code
Page 16

A175

F. Form code
Page 16

B151014

G. Origin
Page 16 Code 11

System type MI INI A

H. TFI constituent
Page 17

13

I. CAS numbers
Page 17

1. 191 - 210 - 13 2. 1120 - 112 - 17
3. 11312 - 164 - 9 4. 87 - 186 - 15 5. - -

Sec. II

A. Quantity generated in 1989
Instruction Page 17

116101612191410

B. Quantity generated in 1989
Page 17

11112140110

C. UOM
Page 18

1

D. Density
Page 18

D K
☐ 1 lbs/gal ☐ 2 sg

E. Was this waste treated, disposed or recycled on site
or discharged to a sewer/POTW?
Page 18

☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

SYSTEM 1

System type
Page 18

MI

Quantity treated, disposed or recycled in 1989
Page 18

SYSTEM 2

System type
Page 18

MI

Quantity treated, disposed or recycled in 1989
Page 18

Sec. III

A. Was this waste shipped off site?
Instruction Page 19 ☐ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

Site 1

B. EPA ID No. of facility to which waste was shipped
Instruction Page 19

A11D101010161212141614

C. System type
Page 19

MI1132

D. Total quantity shipped in 1989
Page 19

6062940

Site 2

A11D10131114919181313

MI0419

24010

Sec. IV

A. Waste minimization results in 1989
Instruction Page 20 ☐ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (THIS FORM IS COMPLETE)

B. Activity
Page 21

See
Comments

WI WI

WI WI

C. Other effects
Page 21

☐ 1 Yes

☐ 2 No

D. Quantity recycled in 1989 due to new activities
Page 21

E. Activity/Production Index
Page 21

NI A

F. Source Reduction Quantity
Page 22

Comments: Sec. IV-New wastewater treatment system completed & in operation. It is Koppers Industries policy that its plants operations optimize & upgrade existing processes to the extent economically possible to achieve waste minimization & reduction - Quantity unknown.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME Koppers Industries, Inc.
Highway 51 South
Tie Plant, Ms. 38960

EPA ID NO. MS1D101017101217151413



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1989 Hazardous Waste Report

FORM
GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I	A. Waste description Instruction Page 15 <u>Soil, Sand, Rock Contaminated with Creosote. Spill Clean Up</u>				
B. EPA hazardous waste code Page 15 <u>U101511</u>			C. State hazardous waste code Page 16 <u>U10151</u>		
D. SIC code Page 16 <u>2141911</u>		E. Source code Page 16 <u>A1531</u>		F. Form code Page 16 <u>B13101</u>	
G. Origin Page 16 Code <u>11</u> System type <u>M1N1A1</u>		H. TRI constituent Page 17 <u>3</u>			
I. CAS numbers Page 17		1. <u>91111111112013</u> 2. <u>11210111112171</u> 3. <u>11312111116419</u> 4. <u>817111111181615</u> 5. <u>11111111111111</u>			

Sec. II	A. Quantity generated in 1988 Instruction Page 17 <u>1121010</u>	B. Quantity generated in 1989 Page 17 <u>10</u>	C. UOM Page 18 <u>1</u>	D. Density Page 18 <u>D1K</u> <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg	E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? Page 18 <input type="checkbox"/> 1 Yes (CONTINUE TO SYSTEM 1) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. III)
SYSTEM 1 System type Page 18 <u>M1</u>			SYSTEM 2 System type Page 18 <u>M1</u>		

Sec. III	A. Was this waste shipped off site? Instruction Page 19 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (SKIP TO SEC. IV)		
Site 1	B. EPA ID No. of facility to which waste was shipped Instruction Page 19 <u>111A1011101319151112171</u>	C. System type Page 19 <u>M101419</u>	D. Total quantity shipped in 1989 Page 19 <u>3600</u>
Site 2	<u>11111111111111</u>	<u>M1</u>	<u>11111111111111</u>

Sec. IV	A. Waste minimization results in 1989 Instruction Page 20 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (THIS FORM IS COMPLETE)				
B. Activity Page 21 <u>See Comments</u>	C. Other effects Page 21 <input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No	D. Quantity recycled in 1989 due to new activities Page 21 <u>11111111111111</u>	E. Activity/Production Index Page 21 <u>11111111111111</u>	F. Source Reduction Quantity Page 22 <u>11111111111111</u>	

Comments: It is Koppers Industries policy for each plant to do everything economically possible to minimize waste. Includes waste received from Carbondale, Ill. in 1987.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME Koppers Industries, Inc.
Highway 51 South
Tie Plant, Ms. 38960

EPA ID NO. MSDI01017101217151413



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1989 Hazardous Waste Report

FORM
PS

WASTE TREATMENT, DISPOSAL,
OR RECYCLING PROCESS
SYSTEMS

INSTRUCTIONS: Read the detailed instructions beginning on page 30 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec.
I

A. Waste treatment, disposal or recycling system description
Instruction Page 36

B. System type
Page 36

MI

C. Regulatory status
Page 36

D. Operational status
Page 37

E. Unit types
Page 37

Sec.
II

A. 1989 Influent quantity
Instruction Page 38

UOM

Density

Total

RCRA

☐ 1 lbs/gal ☐ 2 sg

B. Maximum operational capacity
Page 39

Total

RCRA

C. 1989 liquid effluent quantity
Page 40

UOM

Density

Total

RCRA

☐ 1 lbs/gal ☐ 2 sg

D. 1989 solid/sludge residual quantity
Page 41

UOM

Density

Total

RCRA

☐ 1 lbs/gal ☐ 2 sg

E. Limitations on capacity
Page 41

1. 2. 3.

F. Commercial availability code
Page 41

G. Percent capacity commercially available
Page 42

 %

Sec.
III

A. Planned change in maximum operational capacity
Instruction Page 42

☐ 1 Yes (CONTINUE TO BOX B)

☐ 2 No (THIS FORM IS COMPLETE)

B. New maximum operational capacity
Page 42

UOM

Total

RCRA

C. Planned year of change
Page 43

1191

D. Future commercial availability code
Page 43

E. Percent future capacity commercially available
Page 43

 %

Comments:

NONE TO REPORT

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME Koppers Industries, Inc.
Highway 51 South
Tie Plant, Ms. 38960

EPA ID NO. MS1D101017101217151413



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1989 Hazardous Waste Report

OFF-SITE IDENTIFICATION

FORM

01

INSTRUCTIONS: Read the detailed instructions on the back of this page before completing this form.

Site 1	A. EPA ID No. of off-site installation or transporter <u>AL1D1010161214614</u>	B. Name of off-site installation or transporter <u>Chemical Waste Management, Inc.</u>
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR		D. Address of off-site installation Street <u>Alabama Hwy 17 at Mile Marker 163</u> City <u>Emelle</u> State <u>Al</u> Zip Code <u>35145</u>
Site 2	A. EPA ID No. of off-site installation or transporter <u>AL1D101311419181313</u>	B. Name of off-site installation or transporter <u>Allied Corporation, Fairfield Plant</u>
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR		D. Address of off-site installation Street <u>1327 Erie Street</u> City <u>Birmingham</u> State <u>Al</u> Zip Code <u>35244</u>
Site 3	A. EPA ID No. of off-site installation or transporter <u>LA1D1011013191511217</u>	B. Name of off-site installation or transporter <u>Rollins Enviromental Services, (LA), Inc.</u>
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR		D. Address of off-site installation Street <u>13351 Scenic Highway</u> City <u>Baton Rouge</u> State <u>LA</u> Zip Code <u>70807</u>
Site 4	A. EPA ID No. of off-site installation or transporter <u>NY1D101514112161614</u>	B. Name of off-site installation or transporter <u>Freehold Cartage, Inc.</u>
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> TSDR		D. Address of off-site installation Street <u>P. O. Box 4629</u> City <u>Freehold</u> State <u>NJ</u> Zip Code <u>07728</u>
Site 5	A. EPA ID No. of off-site installation or transporter <u>AL1D1016171131818191</u>	B. Name of off-site installation or transporter <u>Robbie Woods Trucking</u>
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> TSDR		D. Address of off-site installation Street <u>P. O. Box 125 2825 1/2 Old Warrior River Road</u> City <u>Dolomite</u> State <u>AL</u> Zip Code <u>35604</u>

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME

Koppers Industries, Inc.
Highway 51 South
Tie Plant, Ms. 38960

EPA ID NO.

MSID10101710127151413



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1989 Hazardous Waste Report

OFF-SITE IDENTIFICATION

FORM

OI

INSTRUCTIONS:

Read the detailed instructions on the back of this page before completing this form.

Site 1	A. EPA ID No. of off-site installation or transporter <u>01HID1010191816151812151</u>	B. Name of off-site installation or transporter <u>Dart Transportation Co.</u>
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> TSDR		D. Address of off-site installation Street <u>61 Railroad St.</u> City <u>Canfield</u> State <u>OH</u> Zip Code <u>44406</u>
Site 2	A. EPA ID No. of off-site installation or transporter <u>TXID101510161411416131</u>	B. Name of off-site installation or transporter <u>WPI Transportation Co.</u>
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> TSDR		D. Address of off-site installation Street <u>P. O. Box 1105</u> City <u>Friendswood</u> State <u>TX</u> Zip Code <u>77546</u>
Site 3	A. EPA ID No. of off-site installation or transporter []	B. Name of off-site installation or transporter
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR		D. Address of off-site installation Street _____ City _____ State [] [] Zip Code []
Site 4	A. EPA ID No. of off-site installation or transporter []	B. Name of off-site installation or transporter
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR		D. Address of off-site installation Street _____ City _____ State [] [] Zip Code []
Site 5	A. EPA ID No. of off-site installation or transporter []	B. Name of off-site installation or transporter
C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR		D. Address of off-site installation Street _____ City _____ State [] [] Zip Code []

Comments:



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
RAY MABUS
GOVERNOR

December 2, 1991

CERTIFIED MAIL NO P 868 026 171

Mr. J. D. Clayton - Plant Manager
Koppers Industries, Inc.
P. O. Box 160
Tie Plant, MS 38960

Dear Mr. Clayton:

Enclosed please find one (1) copy of the Compliance Evaluation Inspection (CEI) that was conducted at your facility on October 16, 1991. This inspection resulted in no apparent violations being identified.

If you have any comments or questions concerning this inspection report please contact me at (601) 961-5220.

Sincerely,

A handwritten signature in cursive script that reads "David K. Peacock".

David K. Peacock
Hazardous Waste Division

DKP:lfc

cc: Mr. James H. Scarbrough-EPA (w/attachments)

DP1

RCRA Inspection Report

FILE COPY

1. Inspector and Author of Report

David Peacock
Environmental Scientist IV
Mississippi Department of Environmental Quality

2. Facility Information

Koppers Industries, Inc. (Beazer Materials & Services)
P. O. Box 160
Tie Plant, Mississippi 38960

3. Responsible Company Official

Mr. J. D. "Rock" Clayton, Plant Manager
Koppers Industries, Inc. (KII)

4. Inspection Participants

Mr. Gary McClelland, KII
Mr. David Peacock, MDEQ

5. Date and Time of Inspection

October 16, 1991; 10:00 a.m.

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR)
Parts 262, 264, 265, and 268 and Mississippi Waste
Management Permit no. 88-543-01.

7. Purpose of Inspection

This was a Compliance Evaluation Inspection (CEI) to
determine the facility's overall compliance with
applicable regulations and the facility's MHWMR Permit.

8. Facility Description

KII is located in Tie Plant, Mississippi, which is
approximately five miles southeast of Grenada,
Mississippi. The facility is a wood treating facility
which uses creosote and pentachlorophenol in the pressure
treatment of wood products for railroads, construction
industry, utilities, and others. Raw materials arrive and
leave by rail and truck.

Koppers Company, Inc. was acquired by Beazer Materials and
Services, Inc. (BMS) on December 28, 1988. BMS sold the
division, of which the Grenada, Mississippi plant was a

part, to a management group to form Koppers Industries, Inc. (KII).

Until recently KII was considered a generator with a less than 90 day storage area, however, since their filing for interim status under the rules for Burning of Hazardous Waste in Boilers and Industrial Furnaces, KII is now permitted to store hazardous waste beyond the 90 day limit. At the present time KII is awaiting various management decisions and regulatory issues to be resolved prior to burning hazardous waste in its' boiler. KII is also the owner of the surface impoundment and boiler ash landfarm. BMS is the operator of the surface impoundment and BALF.

The surface impoundment is permitted and has been modified to reflect KII as owner and BMS as operator. The unit was certified closed on January 3, 1990, and is now in post closure. K001 constituents have been detected at significant levels in both the upgradient and downgradient wells. The process area has been classified as a SWMU, and is located upgradient to the surface impoundment, close to the upgradient well. This area may be the source of contamination. The Mississippi Department of Environmental Quality requested BMS to submit a workplan, in accordance with Mississippi Commission Order No. 1208-87, for a facility-wide assessment to fully characterize the extent of contamination. Work related to this project is still ongoing.

The BALF was certified closed in June, 1990. Currently, a groundwater quality assessment is being conducted to determine the extent of off-site contamination in this area. The MDEQ is awaiting results of this investigation before proceeding to include this unit in the permit.

The hazardous wastes which are generated and stored at the facility are bottom sediment sludge from the treatment of wastewaters from wood-preserving processes that use creosote and/or pentachlorophenol (F001). Waste creosote (U051) and newly listed hazardous waste (F032) and (F034) are also handled. The surface impoundment was formerly operated as a wastewater treatment lagoon and generated the listed waste K001. Currently, the wastewater is being routed through the wastewater treatment plant, which consists of an oil/water separator an activated sludge system, before being discharged to the City of Grenada POTW. Prior to October, 1987, K001, U051, and F027 wastes were burned in a boiler. The ash from burning these wastes is a hazardous waste. These ashes were deposited in the BALF prior to July, 1987. K001, U051, and F027 are no longer burned in the boiler. Ash from the boiler (prior to the listing of F032 and F034 as hazardous was disposed of in the county sanitary landfill. Waste sludge

from two impoundments was landfarmed at this site prior to the ash disposal. The boiler ash landfarm has been capped with the waste in place.

9. Findings

A record review was conducted at the facility. Records reviewed included inspection reports, personnel training records, waste manifests on received and shipped waste, financial assurance documents, closure and post-closure plans, the facility contingency plan, and the permit. All records appeared to be complete and up-to-date.

A visual site inspection was conducted following the records review, and included the process area, less-than-90 day storage area (permitted under interim status as greater than 90 day unit), closed surface impoundment, and the BALF. All regulations and permit conditions relating to the maintenance and upkeep of these units seemed to be complied with. One minor exception was noted in the fact that the locking well cap to monitor well M-1 had corroded at the hinge and could no longer be secured (as per MHWMR 264.97).

10. Conclusions

The facility is not in violation of any applicable regulations or permit conditions.

11. Recommendations

1. Facility should replace locking well cover on M-1 so that it can be properly secured.

12. Signed

David K. Pearce

11/26/91
Date

13. Approval

Wm. Stephen Spyer

11-26-91
Date

CHECKLIST INDEX

PART 1	GENERAL SITE INFORMATION
PART 2.....	GENERAL FACILITY CHECKLIST
PART 3.....	LAND DISPOSAL RESTRICTIONS CHECKLIST
PART 4.....	GENERATOR'S CHECKLIST
PART 5.....	SURFACE IMPOUNDMENTS CHECKLIST
PART 6.....	GROUNDWATER MONITORING CHECKLIST
PART 7.....	FINANCIAL REQUIREMENTS CHECKLIST

Part 1

General Site Information

Facility Name: KOPPERS INDUSTRIES, INC.
Address: Box 160
Tie Plant, Mississippi

I.D. Number: MSD 007 027 543
Contact: Mr. J. D. "Rock" Clayton
Title: Plant Manager
Phone Number: (601) 226 - 4584

Type of Ownership:

 Federal State County Municipal XX Private

Facility Status:

XX Generator Transporter XX Treatment XX Storage Disposal

Regulatory Status:

 Interim Status Part B Submitted
XX Permitted Part B in Preparation

Principal Inspector Name: David Peacock Title: Env. Scientist IV
Organization: MDEQ Phone Number: (601) 961-5220

Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Representing</u>
David Peacock	Environmental Scientist	MDEQ
Gary McLelland	Yard Foreman	Koppers



Part ____

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ☒ Yes ☐ No ☐ NA

a. If yes, EPA I.D. No. MSD007027543
If no, explain. _____

2. Has facility received hazardous waste from a foreign source? ☒ Yes ☐ No ☐ NA

a. If yes, has it filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ☒ Yes ☐ No ☐ NA

a. If yes, does it include: (264.13) (265.13)

1. Parameters for which each waste will be analyzed? ☒ Yes ☐ No ☐ NA

2. Test methods used to test for these parameters? ☒ Yes ☐ No ☐ NA

3. Sampling method used to obtain sample? ☒ Yes ☐ No ☐ NA

4. Frequency with which the initial analyses will be reviewed or repeated? ☒ Yes ☐ No ☐ NA

5. (For offsite facilities) waste analyses that generators have agreed to supply? ☐ Yes ☐ No ☒ NA

6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

a. Procedures to be used to determine the identity of each movement of waste. ☐ Yes ☐ No ☒ NA

b. Sampling method to be used to obtain representative sample of the waste to be identified. ☐ Yes ☐ No ☒ NA

4. Does the facility provide adequate security through: (264.14) (265.14)

a. 24-hour surveillance system (e.g., television monitoring or guards)? ☐ Yes ☒ No ☐ NA

OR PLANT IS OPEN 24 hrs a day with personnel on duty

- b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ☒ Yes ☐ No ☐ NA

Describe _____

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ☐ Yes ☒ No ☐ NA

Describe _____

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- a. Monitoring equipment? ☒ Yes ☐ No ☐ NA
b. Safety and emergency equipment? ☒ Yes ☐ No ☐ NA
c. Security devices: ☐ Yes ☒ No ☐ NA
d. Operating and structural equipment? ☒ Yes ☐ No ☐ NA
e. Types of problems of equipment:

1. Malfunction ☒ Yes ☐ No ☐ NA
2. Operator error ☒ Yes ☐ No ☐ NA
3. Discharges ☒ Yes ☐ No ☐ NA

6. Does the owner/operator maintain an inspection log? ☒ Yes ☐ No ☐ NA

- a. If yes, does it include:

1. Date and time of inspection? ☒ Yes ☐ No ☐ NA
2. Name of inspector? ☒ Yes ☐ No ☐ NA
3. Notation of observations? ☒ Yes ☐ No ☐ NA
4. Date and nature of repairs or remedial action? ☒ Yes ☐ No ☐ NA
5. Identification of potential problems? ☒ Yes ☐ No ☐ NA

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) ☐ Yes ☒ No ☐ NA

- c. Are records kept a minimum of three years? ☒ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility? ☒ Yes ☐ No ☐ NA

Date of most recent training: SEPT. 10, 1991

How long are they kept? 1981 - 10 years

a. If yes, do they include:

- | | | | |
|--|---|-----------------------------|-----------------------------|
| 1. Job title and written job description of each position? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 2. Description of type and amount of training? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 3. Records of training given to facility personnel? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |

Requirements for Ignitable, Reactive, or Incompatible Waste
(264.17) (265.17)

8. Does facility handle ignitable or reactive wastes? ☐ Yes ☒ No ☐ NA

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flames confined to specifically designated locations? ☒ Yes ☐ No ☐ NA

c. Are "No Smoking" signs posted in hazardous areas? ☒ Yes ☐ No ☐ NA

d. Are precautions documented (Part 264 only)? ☒ Yes ☐ No ☐ NA

9. Check containers

a. Are containers leaking or corroding? ☐ Yes ☒ No ☐ NA

b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☒ No ☐ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) ☒ Yes ☐ No ☐ NA

If yes, use narrative explanation sheet to explain.

SOME CONTAMINATED SOIL WAS STILL IN EVIDENCE AROUND
DRIP-PAD AREA AND IN PROCESS AREA

2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system? ☐ Yes ☒ No ☐ NA

1. Is it easily accessible in case of emergency? ☐ Yes ☐ No ☒ NA

b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No ☐ NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ☒ Yes ☐ No ☐ NA

d. Water of adequate volume of hoses, sprinklers, or water spray system? ☒ Yes ☐ No ☐ NA

1. Describe source of water 100,000 gal. WATER tower

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35) (265.35) ☒ Yes ☐ No ☐ NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37) ☒ Yes ☐ No ☐ NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? ☒ Yes ☐ No ☐ NA (264.37) (265.37)

a. If yes, name primary authority GRENADE FIRE & POLICE

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (264.37) (265.37) ☒ Yes ☐ No ☐ NA

a. Are they really available to all personnel? ☒ Yes ☐ No ☐ NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37) (265.37) ☒ Yes ☐ No ☐ NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37) ☐ Yes ☐ No ☒ NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ☒ Yes ☐ No ☐ NA
(264.53) (265.53)
- a. If yes, is it a revised SPCC Plan? ☒ Yes ☐ No ☐ NA
- b. Does contingency plan include: (264.52) (265.52)
1. Arrangements with local emergency response organizations? ☒ Yes ☐ No ☐ NA
2. Emergency coordinator's names, phone numbers and addresses? ☒ Yes ☐ No ☐ NA
3. List of all emergency equipment at facility and descriptions of equipment? ☒ Yes ☐ No ☐ NA
4. Evacuation plan for facility personnel? ☒ Yes ☐ No ☐ NA
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) ☒ Yes ☐ No ☐ NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) ☒ Yes ☐ No ☐ NA
(265.71) RECEIVES F-032-F034 WASTE FROM OUT-OF-STATE Koppers facility (HAS file A PRE-COMPLIANCE notification for interim status under BIF Regs)
- a. If yes, does the owner/operator retain copies of all manifests? ☒ Yes ☐ No ☐ NA
1. Are the manifests signed and dated and returned to the generator? ☒ Yes ☐ No ☐ NA
2. Is a signed copy given to the transporter? ☒ Yes ☐ No ☐ NA
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, is it accompanied by a shipping paper? ☐ Yes ☐ No ☐ NA
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☐ No ☐ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☐ NA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) ☐ Yes ☒ No ☐ NA
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☐ Yes ☐ No ☒ NA
1. If no, has Regional Administrator been notified? ☐ Yes ☐ No ☒ NA

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73)

☒ Yes ☐ No ☐ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received?
2. Methods and dates of treatment, storage, and disposal?
3. Location and quantity of each hazardous waste at each location?
4. Cross-references to manifests/shipping papers?
5. Records and results of waste analyses?
6. Report of incidents involving implementation of the contingency plan?
7. Records and results of required inspections?
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F?
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)?
10. Notices of generators as specified in Section 264.12(b) (Part 264)?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☐ Yes ☒ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

b. Does facility have copy of permit on site?

☒ Yes ☐ No ☐ NA

5. Does the facility submit a biennial report by March 1 every even-numbered year? (264.75) (265.75)

☒ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number?
2. Date and year covered by report?
3. Description/quantity of hazardous waste?
4. Treatment, storage, and disposal methods?
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)?
6. Most recent closure and post-closure cost estimates?
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?
8. Certification signed by owner/operator?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76)

☐ Yes ☒ No ☐ NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director?

☐ Yes ☐ No ☒ NA

Submitted
Separately

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

☒ Yes ☐ No ☐ NA



Part ____

LAND DISPOSAL RESTRICTIONS CHECKLIST

Section A - General

1. Are hazardous wastes land-disposed on site? ☐ Yes ☒ No ☐ NA

a. If yes, are one or more of the following circumstances true:

1. Granted extension from effective date pursuant to Section 268.5? ☐ Yes ☐ No ☒ NA

2. Granted exemption from a prohibition pursuant to a petition under Section 268.6? ☐ Yes ☐ No ☒ NA

3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1990? ☐ Yes ☐ No ☒ NA

4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? ☐ Yes ☐ No ☒ NA

5. Wastes not yet prohibited by Part 268? ☐ Yes ☐ No ☒ NA

2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? ☐ Yes ☒ No ☐ NA

3. Are there active surface impoundments used for treatment of hazardous wastes? ☐ Yes ☒ No ☐ NA

a. If yes, does the unit's design and operation meet the requirements set forth in Section 268.4? ☐ Yes ☐ No ☒ NA

4. Has the facility sought exemption from any prohibition under Subpart C of Section 268 for the disposal of a restricted hazardous waste? ☐ Yes ☒ No ☐ NA

a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? ☐ Yes ☐ No ☒ NA

5. Has the facility determined whether it generates a restricted waste through waste analysis? (268.7) ☐ Yes ☒ No ☐ NA

Knowledge of work process
a. If yes, is the facility, in fact, handling a restricted waste(s)? ☐ Yes ☐ No ☒ NA

b. If yes, does the restricted waste require treatment? ☐ Yes ☐ No ☒ NA

- c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? ☐ Yes ☐ No ☒ NA
6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? (268.10) ☐ Yes ☒ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? ☐ Yes ☐ No ☒ NA
 2. The solvent waste is generated from a CERCLA response corrective action? ☐ Yes ☐ No ☒ NA
 3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. ☐ Yes ☐ No ☒ NA
- b. If no, have any of these restricted wastes began land-disposed (except in an injection well) since November 8, 1986? ☐ Yes ☒ No ☐ NA
7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027 or F028 (dioxin-containing wastes)? ☒ Yes ☐ No ☐ NA
 → PENTACHLOROPHENOL
- a. If yes, do any of the following conditions apply:
1. Wastes are treated to meet standards of Subpart D of Section 268? ☐ Yes ☒ No ☐ NA
 2. Wastes are disposed of at a facility that has been granted a petition? ☐ Yes ☒ No ☐ NA
 3. An extension has been granted? ☐ Yes ☒ No ☐ NA
- b. If no, were these restricted wastes land disposed after November 8, 1988? ☐ Yes ☒ No ☐ NA
8. Are restricted wastes being treated? ☐ Yes ☒ No ☐ NA
- a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? ☐ Yes ☐ No ☒ NA

Section B - Generator Compliance

1. Waste Identification

a. Does the generator handle the following wastes:

1. Solvent wastes

- (i) F001, F002, F004, or F005 ☐ Yes ☒ No ☐ NA
(ii) F003 ☐ Yes ☒ No ☐ NA

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☒ No ☐ NA

Note: Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially misclassified F-solvents, Appendix A-2 presents a list of corresponding F and U wastes.

2. Dioxin wates (F020-F023, F026-F028) ☒ Yes ☐ No ☐ NA
3. Potential California List Wastes ☐ Yes ☐ No ☐ NA
(see Appendix C)
(i) D002 ☐ Yes ☐ No ☐ NA
(ii) D004-D011 ☐ Yes ☐ No ☐ NA
(iii) Any other waste characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ☒ Yes ☐ No ☐ NA
(iv) Any F, K, P, or U wastes subject to "soft hammer" requirements that may qualify as California wastes due to HOCs, metals, or cyanide content? ☒ Yes ☐ No ☐ NA
(See Appendix F)
4. First Third Wastes (See MHWMR 268.10) ☒ Yes ☐ No ☐ NA
5. Second Third Wastes (See MHWMR 268.11) ☐ Yes ☐ No ☐ NA
6. (Reserved)
(i) Are any of the above "soft hammer" wastes? (See Appendices D & E) ☐ Yes ☐ No ☐ NA

2. BDAT Treatability Group - Treatment Standards Identification

a. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ☐ Yes ☒ No ☐ NA

- b. If yes, did the generator select the most stringent treatment standard for the constituent of concern [Section 268.41(b)]?

☐ Yes ☐ No ☒ NA

c. F Solvents

Did the generator correctly determine the appropriate treatability group [Section 268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☐ Yes ☐ No ☒ NA

d. California Wastes

Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [Section 268.32(a)(3)]?

☐ Yes ☐ No ☒ NA

e. First and Second Third Waste

1. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [Section 268.7(a)]?

☐ Yes ☐ No ☒ NA

2. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

☐ Yes ☐ No ☒ NA

3. Waste Analysis

- a. Did the generator determine whether the waste exceeds treatment standards based on Section 268.7(a):

1. Knowledge of wastes

☒ Yes ☐ No ☐ NA

- (i) List wastes for which "applied knowledge" was used:

U051, K001, F027, F034
F032

List those that did not exceed standards: _____

- c. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [Section 268.3]

___ Yes ___ No ☒ NA

6. Has the generator conducted any testing of those hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes?

___ Yes ___ No ☒ NA

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

___ Yes ___ No ☒ NA

4. Management

a. Onsite management

1. Were restricted wastes managed onsite?

☒ Yes ___ No ___ NA

2. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?

☒ Yes ___ No ___ NA

If yes, TSDF checklist must be completed.

b. Offsite Management

1. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

- | | |
|--|---|
| (i) EPA Hazardous Waste Number? | <input checked="" type="checkbox"/> Yes ___ No ___ NA |
| (ii) Corresponding treatment standard? | <input checked="" type="checkbox"/> Yes ___ No ___ NA |
| (iii) Manifest number? | <input checked="" type="checkbox"/> Yes ___ No ___ NA |
| (iv) Waste analysis, if available? | <input checked="" type="checkbox"/> Yes ___ No ___ NA |

Identify offsite treatment facilities (1) ALLIED CORP. Birmingham, ALA.
(2) GSX SERVICES OF S.C., INC.

2. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- | | |
|--|---|
| (i) EPA hazardous waste I.D. number? | ___ Yes ___ No <input checked="" type="checkbox"/> NA |
| (ii) Corresponding treatment standard? | ___ Yes ___ No <input checked="" type="checkbox"/> NA |

2. TCLP

__Yes __No ☒ NA

- (i) List wastes for which "TCLP" was used:

- (ii) MHWMR 268.41 lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP?

__Yes __No ☒ NA

If yes, list: _____

3. Total waste analysis

__Yes __No ☒ NA

4. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

5. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [Section 264.13(a)(3)(i) or Section 265.13(a)(3)(i)]?

__Yes __No ☒ NA

- b. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [Section 268.7(a)(1)]?

List those that exceeded standards: _____

(iii) Manifest number

☐ Yes ☐ No ☒ NA

(iv) Certification regarding waste and that it meets treatment standards?

☐ Yes ☐ No ☒ NA

Identify land disposal facilities receiving the BDAT certified wastes _____

3. If the generator's waste is subject to a Section 268.5 case by case exemption, a Section 268.6 "no migration" exemption, or a nationwide variance does the generator's records indicate that he or she submits with each waste shipment [Section 268.7(a)(3)]:

(i) EPA Hazardous Waste Number?

☐ Yes ☐ No ☒ NA

(ii) Corresponding Treatment Standards?

☐ Yes ☐ No ☒ NA

(iii) All applicable prohibitions?

☐ Yes ☐ No ☒ NA

(iv) The manifest number?

☐ Yes ☐ No ☒ NA

(v) The date the wastes are subject to prohibitions?

☐ Yes ☐ No ☒ NA

(vi) Does generator keep records of all notifications/certifications send to offsite facilities?

☐ Yes ☐ No ☒ NA

List all prohibited wastes for which records are not provided per above [Section 268.7(a)(b)]:

N/A

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

N/A

4. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number?

☒ Yes ☐ No ☐ NA

Applicable prohibitions?

☒ Yes ☐ No ☐ NA

The manifest number?

☒ Yes ☐ No ☐ NA

Waste analysis data, where available?

☒ Yes ☐ No ☐ NA

(i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [Section 268.33(f)]?

☐ Yes ☒ No ☐ NA

If yes, list type of treatment unit and processes

K-001 WASTE IS PLACED
INTO OIL/WATER SEPARATOR

If yes, TSDF checklist must be completed.

Section C - Treatment, Storage & Disposal Requirements

1. General

a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?

b. Describe the frequency of sampling conducted by the facility.

2. Treatment Facilities

a. Has the treatment facility revised its waste analysis plan [Section 268.7(b)] to meet the requirements of Section 264.13 or 265.13?

__Yes __No ☒ NA

(i) Is the treatment facility conducting TCLP tests for wastes subject to treatment standards expressed as waste extracts per 268.7(b)(i)?

__Yes __No ☒ NA

(ii) Is the treatment facility using the paint filter test for the California waste residues [Section 268.7(b)(ii)]?

__Yes __No ☒ NA

(iii) Is the treatment facility testing the pH of California waste residues?

__Yes __No ☒ NA

(iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [Section 268.7(b)(3)]?

__Yes __No ☒ NA

(v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [Section 268.7(b)(1)]?

__Yes __No ☒ NA

If yes, list facility of destination and waste of concern [Section 268.8(a)(2)]

(ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [Section 268.7(a)(2)]? ☐ Yes ☐ No ☒ NA

(iii) Has the generator retained a copy of the demonstration on site [Section 268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No ☒ NA

(iv) Has the generator retained copies of all Section 268.8 certifications sent to the TSDF [Section 268.7(a)(6)] ☒ Yes ☐ No ☐ NA

(v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [Section 268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No ☒ NA

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [Section 268.8(b)(3)]? ☐ Yes ☐ No ☒ NA

5. Storage of Prohibited Waste

a. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☒ No ☐ NA

If yes, was facility operating as a TSD under interim status or final permit [Section 262.34(b)]? ☐ Yes ☐ No ☐ NA

If yes, TSDF Checklist must be completed.

6. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e, boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☒ Yes ☐ No ☐ NA

K001 WASTE

3. Land Disposal Facilities

- a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ☐ Yes ☐ No ☒ NA
- b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [Section 268.7(c)(2)]? ☐ Yes ☐ No ☒ NA
- c. Are they being tested in conformance with the frequency specified in the waste analysis plan [Section 268.7(c)(3)]? ☐ Yes ☐ No ☒ NA
- d. Are the appropriate tests (TCLP vs. total waste) being used [Section 268.7(c)(2)]? ☐ Yes ☐ No ☒ NA

4. Storage (Section 268.50)

- a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ☒ Yes ☐ No ☐ NA
- b. Are all containers clearly marked to identify content and date(s) entering storage [Section 268.50(a)(2)]? ☒ Yes ☐ No ☐ NA
- c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [Section 264.73 or Section 265.73]? ☒ Yes ☐ No ☐ NA
- d. Do operating records agree with container labeling? [Section 268.50(a)(2) or Section 264.73 or Section 265.73] ☒ Yes ☐ No ☐ NA
- e. Is waste exceeding treatment standards stored for less than 1 year? ☒ Yes ☐ No ☐ NA

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☒ No ☐ NA

If yes, state how: _____

- f. Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☒ No ☐ NA

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal:

5. Treatment in Surface Impoundments (Section 268.4)

- a. Are prohibited wastes placed in surface impoundments for treatment? ☐ Yes ☒ No ☐ NA
- b. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [Section 268.4(b) and Section 268.3]? ☐ Yes ☐ No ☒ NA
- c. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency [Section 268.4(a)(4)]? ☐ Yes ☐ No ☒ NA
- d. Have the minimum technology requirements been met [Section 268.4(a)(4)]? ☐ Yes ☐ No ☒ NA
1. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [Section 268.4(a)(3)(iii)]? ☐ Yes ☐ No ☒ NA
- e. Have the Subpart F groundwater monitoring requirements been met [Section 268.4(a)(3)]? ☐ Yes ☐ No ☒ NA
- f. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [Section 268.4(a)(2)]? ☐ Yes ☐ No ☒ NA
- g. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? ☐ Yes ☐ No ☒ NA
- h. Provide the frequency of analyses conducted on treatment residues: _____

Does the frequency meet the requirements of the waste analysis plan [Section 264.13 or Section 265.13]? ☐ Yes ☐ No ☒ NA

i. Does the operating record adequately document the results of waste analyses performed [Section 264.13 or Section 265.13]? Yes No ☒ NA

j. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [Section 268.4(a)(2)(ii)]? Yes No ☒ NA

1. If answer to f is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) Yes No ☒ NA

k. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? Yes No ☒ NA

l. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? Yes No ☒ NA

1. Were these residues subject to a valid 268.8 certification? Yes No ☒ NA

m. When removed, were wastes treated prior to disposal? Yes No ☒ NA

1. If yes, are waste residues treated on or offsite? Yes No ☒ NA

2. Identify management method: _____

6. Other Treatment

a. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)? ☒ Yes No NA

b. Describe the treatment processes, including exempt processes: TREATMENT OF WASTEWATER
(KOO) FROM WOOD PRESERVING PROCESS

c. Does the facility treat soft-hammered wastes? Yes ☒ No NA

1. If yes, is treatment occurring as described in the generator's certification/demonstration [Section 268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
2. Did the treatment facility certify he treated the soft-hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
3. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [Section 268.8(c)(2)]? ☐ Yes ☐ No ☒ NA
- d. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [Section 268.7(c)(2)]? ☒ Yes ☐ No ☐ NA
- e. Describe frequency of testing of treatment residuals.
- _____
- _____
- _____
- f. Was dilution used as a substitute for treatment [Section 268.3]? ☐ Yes ☒ No ☐ NA
- g. Are all notifications, certifications, and results of waste analyses kept in the operating record [Section 264.73(b) or Section 265.73(b)]? ☒ Yes ☐ No ☐ NA
- h. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [Section 268.7(b)(4) and (5) and Section 268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
- i. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [Section 268.7(b)(6)]? ☐ Yes ☐ No ☒ NA

7. Land Disposal

- a. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments*)

waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker?) ☐ Yes ☐ No ☒ NA

- b. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [Section 268.7(c)(1) and 268.7(a),(b)]?

☐ Yes ☐ No ☒ NA

- c. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [Section 268.7(c)(2)]?

☐ Yes ☐ No ☒ NA

If yes, was the frequency of testing as required by the facility's waste analysis plan [Section 264.13 or 265.13]?

☐ Yes ☐ No ☒ NA

- d. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]?

☐ Yes ☐ No ☒ NA

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][Section 268.30(d), Section 268.31(d), Section 268.32(g), Section 268.33(e)]?

☐ Yes ☐ No ☒ NA

- e. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed?

☐ Yes ☐ No ☒ NA

If yes, have the minimum technology requirements been met for all units receiving such wastes [Section 268.30(c), 268.31(c), 268.32(d), 268.33(d)]?

☐ Yes ☐ No ☒ NA

- f. Were adequate records of disposal maintained [Section 264.73(b) or 265.73(b)]?

☐ Yes ☐ No ☒ NA

- g. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal? [Section 264.73(b) or Section 265.73(b)]

☐ Yes ☐ No ☒ NA

- h. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports?

☐ Yes ☐ No ☒ NA

i. If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [Section 268.8(a)(2)-(a)(4)]?

☐ Yes ☐ No ☒ NA

1. Is the facility disposing of any soft hammer wastes that may be classified as California wastes?

☐ Yes ☐ No ☒ NA

2. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban?

☐ Yes ☐ No ☒ NA



Part _____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12)

☒ Yes ☐ No ☐ NA

a. If yes, EPA I.D. No. MSD 007 027 543

Section B - Manifest

1. Does generator ship waste offsite? (262.20)

☒ Yes ☐ No ☐ NA

a. If no, do not fill out Sections B and D.

b. If yes, identify primary offsite facility(s).

GSX SERVICES OF S.C. INC.

2. Does generator use manifest? (262.20)

☒ Yes ☐ No ☐ NA

a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)?

☐ Yes ☐ No ☒ NA

1. If yes, does generator indicate this when sending waste to a TSD facility?

☐ Yes ☒ No ☐ NA

b. If yes, does manifest include the following information?

1. Manifest document No.

☒ Yes ☐ No ☐ NA

2. Generator's name, mailing address, telephone number

☒ Yes ☐ No ☐ NA

3. Generator EPA I.D. No.

☒ Yes ☐ No ☐ NA

4. Transporter Name(s) and EPA I.D. No.(s)

☒ Yes ☐ No ☐ NA

5. a. Facility name, address, and EPA I.D. No.

☒ Yes ☐ No ☐ NA

b. Alternate facility name, address, and EPA I.D. No.

☐ Yes ☐ No ☒ NA

c. Instructions to return to generator if undeliverable

☐ Yes ☐ No ☒ NA

6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number)

☒ Yes ☐ No ☐ NA

7. Emergency information (optional) (special handling instructions, telephone No.)

☒ Yes ☐ No ☐ NA

8. Is the following certification on each manifest form?

☒ Yes ☐ No ☐ NA

shipped K-001 115 truckload to Allied 01/09/91
F032, F034 (Drilling Mud & Soil Boring) to GSX 8/21/91
WITNESS

Allied Corp
Birmingham, Ala.
ALD031499833
K001

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ☐ No ☐ NA

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? ☒ Yes ☐ No ☐ NA
2. Who signed for generator?

Name GARY E. McCLELLAND Title YARD FOREMAN

W051

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No ☐ NA
2. Who signed and dated for transporter?

Name HARRY BROWN Title ?

c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No ☐ NA
d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No ☐ NA
e. Does generator retain copies for 3 years? ☒ Yes ☐ No ☐ NA

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ☒ Yes ☐ No ☐ NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.) _____

2. Does generator solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ☐ Yes ☒ No ☐ NA

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____

b. Does generator determine characteristics by testing or by applying knowledge of processes? APPLIED KNOWLEDGE

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☐ Yes ☐ No ☒ NA

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators?

☒ Yes ☐ No ☐ NA

- a. If yes, did generator test all wastes to determine nonhazardous characteristics?

☒ Yes ☐ No ☐ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)

☒ Yes ☐ No ☐ NA

2. a. Are containers to be shipped leaking or corroding?
b. Use sheet to describe containers and condition.
c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

4. Does generator mark each package in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

5. Is each container of 110 gallons or less marked with the following label? (262.32)

☒ Yes ☐ No ☐ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33)

☒ Yes ☐ No ☐ NA

7. Accumulation time: (262.34)

a. Are containers used to temporarily store waste before transport? ☒ Yes ☐ No ☐ NA

1. If yes, is each container clearly dated:
Also, fill out rest of No. 7 (accum. time) ☐ Yes ☐ No ☒ NA

b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ☒ Yes ☐ No ☐ NA

2. If yes, with what frequency? DAILY

c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ☐ Yes ☐ No ☒ NA

NOTE: If tanks are used, fill out checklist for tanks.

d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form? ☐ Yes ☐ No ☐ NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ☐ Yes ☐ No ☐ NA

8. Describe storage area. Use photos and narrative explanation sheet. LARGE METAL BUILDING N/E OF PROCESS AREA. THIS BUILDING HAS BEEN PERMITTED AS A GREATER THAN 90 DAY STORAGE FACILITY UNDER INTERIM STATUS (BIF)

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?

a. Manifests and signed copies from ☒ Yes ☐ No ☐ NA
b. Biennial Reports ☒ Yes ☐ No ☐ NA
c. Exception reports ☒ Yes ☐ No ☐ NA
d. Test results ☒ Yes ☐ No ☐ NA

2. Where are the records kept (at facility or elsewhere)?

ENT OFFICE OF GARY McCELLAND

3. Who is in charge of keeping the records?

Name GARY McCELLAND Title YARD FOREMAN

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator? ☐ Yes ☒ No ☐ NA
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No ☐ NA
- b. Is this waste manifested and signed by a foreign cosignee? ☐ Yes ☐ No ☐ NA
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No ☐ NA



Part ____

SURFACE IMPOUNDMENTS CHECKLIST

Section A - Design Requirements (264.221) (265.221)

1. Does facility operate one or more surface impoundments? Yes ☒ No ☒ NA

CLOSED IMPOUNDMENT

a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units? Yes No ☒ NA

b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents? Yes No ☒ NA

c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? Yes No ☒ NA

d. If impoundment does not have a double liner, is it exempt due to one of the following reasons? Yes No ☒ NA

1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.
2. Monofill has at least one liner for which there is no evidence of leaking.
3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs.

e. Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error (Part 264)? Yes No ☒ NA

f. Is impoundment surrounded by dikes (Part 264)? Yes No ☒ NA

Section B - Operating Requirements

1. Does owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)? (265.222)

2. Does owner/operator have certification from a qualified engineer that alternate design features will prevent overtopping? (Part 265) (265.222) Yes No ☒ NA

Section C - Containment Systems

1. Do all dikes have a protective cover such as grass, shale or rock? (Part 265) (265.223) ☐ Yes ☐ No ☒ NA

Section D - Waste Analysis and Trial Tests

1. Will the surface impoundment be used to: (265.225)
- a. Chemically treat a hazardous waste which is substantially different from wastes previously treated in the impoundment? (Part 265) ☐ Yes ☐ No ☒ NA
 - b. Chemically treat hazardous waste with a substantially different process than any previously used in that impoundment? ☐ Yes ☐ No ☒ NA
2. If the answer in #1 was yes to any questions, has the owner/operator:
- a. Conducted waste analysis or trial treatment tests? ☐ Yes ☐ No ☒ NA
 - b. Obtained written, documented information on treatment of similar wastes under similar operating conditions? ☐ Yes ☐ No ☒ NA

Section E - Inspections and Monitoring

1. Does the owner/operator:
- a. Inspect the freeboard at least one each operating day? (265.226) ☐ Yes ☐ No ☒ NA
 - b. Inspect the surface impoundment including dikes and vegetation at least once per week and after storms? (264.226) (265.226) ☐ Yes ☐ No ☒ NA
2. Have any deteriorations or malfunctions that have been found been remediated? ☐ Yes ☐ No ☒ NA
3. Has the owner/operator obtained a certification from a qualified engineer that the impoundments dike has structural integrity? (264.226) ☐ Yes ☐ No ☒ NA

Section F - Emergency Repairs, Contingency Plans (Part 264) (264.227)

1. Does facility have a contingency plan? ☐ Yes ☐ No ☒ NA
- a. If yes, does plan stipulate that impoundment be removed from service under the following conditions:
 - 1. Sudden drop in liquid level? ☐ Yes ☐ No ☒ NA

2. Leaking dike?

☐ Yes ☐ No ☒ NA

b. Does plan detail the steps to be followed when removing impoundment from service, including:

1. Shutting off flow into impoundment?

☐ Yes ☐ No ☒ NA

2. Containing any surface leakage?

☐ Yes ☐ No ☒ NA

3. Stopping the leak?

☐ Yes ☐ No ☒ NA

4. Notifying Regional Administrator of problems in writing if leaks cannot be contained?

☐ Yes ☐ No ☒ NA

c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems before restoring impoundment to service?

☐ Yes ☐ No ☒ NA

d. If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan?

☐ Yes ☐ No ☒ NA

Section G - Closure and Post-Closure (264.228) (265.228)

1. Is a closure plan retained at the facility?

☒ Yes ☐ No ☐ NA

2. At closure, did owner/operator:

a. Remove standing liquids (Part 265)?

☒ Yes ☐ No ☐ NA

b. Remove waste and waste residue (Part 265)?

☒ Yes ☐ No ☐ NA

c. Remove liner (Part 265)?

☐ Yes ☐ No ☒ NA

d. Remove underlying and surrounding contaminated soil?

☒ Yes ☐ No ☐ NA

e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were non-hazardous (Part 265)?

☐ Yes ☐ No ☒ NA

1. If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)?

☐ Yes ☐ No ☒ NA

3. If regulated under Part 264, has owner/operator: (264.228)

a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste?

☒ Yes ☐ No ☐ NA

b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues?

☒ Yes ☐ No ☐ NA

c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover?

☒ Yes ☐ No ☐ NA

d. Covered the impoundment with final cover?

☒ Yes ☐ No ☐ NA

4. Did owner/operator leave any residuals in place at closure (Part 264)? (264.228)

☒ Yes ☐ No ☐ NA

5. In post-closure, does owner/operator maintain integrity of cover and groundwater monitoring system, and prevent runoff and runoff? (264.228) (265.228)

☒ Yes ☐ No ☐ NA

Section H - Ignitable and Reactive Wastes (264.229) (265.229)

1. Are ignitable or reactive wastes placed in the impoundment?

☐ Yes ☒ No ☐ NA

- a. If yes, are they treated, rendered, or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive?

☐ Yes ☐ No ☒ NA

OR

- b. Is the impoundment used solely for emergencies?

☐ Yes ☐ No ☒ NA

Section I - Incompatible Wastes (264.230) (265.230)

1. Are incompatible wastes placed in the impoundment?

☐ Yes ☒ No ☐ NA



Part ____

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a groundwater monitoring system in operation? ☒ Yes ☐ No ☐ NA
- a. If yes, does the system consist of: (265.91)(264.97)
1. At least one upgradient/background well? ☒ Yes ☐ No ☐ NA
2. At least three downgradient wells? ☒ Yes ☐ No ☐ NA
- b. Are wells identified in the field? ☐ Yes ☒ No ☐ NA
- c. Are well heads in good condition (i.e. free of cracks)? ☒ Yes ☐ No ☐ NA
- d. Are well heads locked? *M-1 HEAD RUSTED OFF* ☐ Yes ☒ No ☐ NA
- e. Do well heads have bumper guards or are otherwise protected? ☒ Yes ☐ No ☐ NA

Section B - Sampling and Analysis (Part 264)

1. Does the facility obtain and analyze samples from the groundwater monitoring system? ☒ Yes ☐ No ☐ NA
2. Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d)) ☒ Yes ☐ No ☐ NA
- a. If yes, does this plan include procedures and techniques for:
1. Sample collection? ☒ Yes ☐ No ☐ NA
2. Sample preservation? ☒ Yes ☐ No ☐ NA
3. Analytical procedures? ☒ Yes ☐ No ☐ NA
4. Chain-of-custody control? ☒ Yes ☐ No ☐ NA
5. Determining the groundwater surface elevation? ☒ Yes ☐ No ☐ NA
3. Has facility specified a statistical method to be used in evaluating groundwater monitoring data? ☒ Yes ☐ No ☐ NA
4. Is all groundwater monitoring data recorded in the operating record? ☒ Yes ☐ No ☐ NA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases? ☒ Yes ☐ No ☐ NA
- a. If yes, are the following components included in the system:
1. Background values? ☒ Yes ☐ No ☐ NA
 2. Determination of groundwater flow rate and direction annually? (264.98(e)) ☒ Yes ☐ No ☐ NA
 3. Determination of statistically significant increases over background concentrations at each well? (264.98(f)) ☒ Yes ☐ No ☐ NA
 4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)? ☒ Yes ☐ No ☐ NA
 5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)? ☒ Yes ☐ No ☐ NA
 6. Is all information contained in the facility's operating record? ☒ Yes ☐ No ☐ NA

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program? ☐ Yes ☒ No ☐ NA
- a. If yes, does the facility:
1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) ☐ Yes ☐ No ☒ NA
 2. Collect at least four samples from each well at least semi-annually? (264.99(f)) ☐ Yes ☐ No ☐ NA
 3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well? ☐ Yes ☐ No ☐ NA
 4. If an increase was indicated, did facility notify the Executive Director? ☐ Yes ☐ No ☐ NA
 5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually? ☐ Yes ☐ No ☐ NA
 6. Record all information in the operating record? ☐ Yes ☐ No ☐ NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements? ☒ Yes ☐ No ☐ NA

Section F - Sampling and Analysis (Part 265)

1. Has the facility developed and followed a groundwater sampling and analysis plan? ☐ Yes ☐ No ☒ NA
- a. If yes, does the plan include procedures and techniques for:
- 1. Sample collection? ☐ Yes ☐ No ☐ NA
 - 2. Sample preservation? ☐ Yes ☐ No ☐ NA
 - 3. Analytical procedure? ☐ Yes ☐ No ☐ NA
 - 4. Chain-of-custody control? ☐ Yes ☐ No ☐ NA
2. Has the owner/operator established initial background concentrations or values of all parameters specified in 265.92(b)? ☐ Yes ☐ No ☐ NA
- a. Samples collected to establish background quality (from above)? ☐ Yes ☐ No ☐ NA
- b. Samples collected to indicate contamination (from above)? ☐ Yes ☐ No ☐ NA
- c. Elevation of groundwater surface at each monitoring well at each sampling event? ☐ Yes ☐ No ☐ NA

Section G - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a groundwater quality assessment program? ☐ Yes ☐ No ☒ NA
- a. If yes, did program determine the following:
- 1. Whether hazardous waste or hazardous waste constituents have entered the groundwater? ☐ Yes ☐ No ☐ NA
 - 2. Rate and extent of hazardous waste or hazardous waste constituent migration? ☐ Yes ☐ No ☐ NA
 - 3. Concentrations of hazardous waste or hazardous waste constituents in groundwater? ☐ Yes ☐ No ☐ NA
- b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? ☐ Yes ☐ No ☐ NA
- c. Has owner/operator submitted information documenting any significant increase in comparisons for up-gradient wells (or decrease in pH)? ☐ Yes ☐ No ☐ NA
- d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional groundwater samples from

those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error)

___ Yes ___ No ☒ NA

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days? ___ Yes ___ No ___ NA
2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified groundwater quality assessment program? ___ Yes ___ No ___ NA
3. Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following: ___ Yes ___ No ___ NA
 - a. Rate and extent of migration of the hazardous waste constituents in the groundwater? ___ Yes ___ No ___ NA
 - b. Concentrations of the hazardous waste in the groundwater? ___ Yes ___ No ___ NA
4. Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days? ___ Yes ___ No ___ NA
5. Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the groundwater? ___ Yes ___ No ___ NA
6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or groundwater quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if groundwater quality assessment plan was implemented during post-closure? ___ Yes ___ No ___ NA
7. If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to the Executive Director, as outlined in No. 4 above? ___ Yes ___ No ___ NA
8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation

obtained under No. 3c in Section F above
to determine whether the requirements for
locating monitoring wells are satisfied?

__Yes __No ☒ NA

- a. If evaluation shows that the requirements
for monitoring wells are not satisfied,
has owner/operator modified the number,
location, or depth of the monitoring wells
to bring the system into compliance?

__Yes __No ☒ NA

Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

1. Unless owner/operator is monitoring to satisfy the
requirements of Section 265.93(d)(4), does owner/
operator:

- a. Keep records of the analyses required in Section
265.92(c) and (d), groundwater surface elevations
required in 265.93(b) throughout the active life
of the facility and throughout post-closure?
b. Report the following information to the Executive
Director:

__Yes __No ☒ NA

1. Within 15 days of analysis for each quarterly
sampling event, does owner/operator submit
results of background concentrations?

__Yes __No ☒ NA

2. Does owner/operator inform the Executive
Director about any parameters that exceed
maximum contaminant levels listed in Appendix
III?

__Yes __No ☒ NA

3. (Annually) does owner/operator report
concentrations or values of parameters listed
in Section 265.92(b)(3) for each well, including
required evaluation for these parameters under
Section 265.93(b)?

__Yes __No ☒ NA

- a. Does owner/operator also identify
differences from initial background
concentrations found in the upgradient
wells no later than March 1 following
each calendar year?

__Yes __No ☒ NA

2. Does owner/operator submit results of the groundwater
surface elevations under Section 265.93(f), along with
a description of the response, if needed?

__Yes __No ☒ NA



Part ____

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? Yes ☒ No ☒ NA ☐
- a. Type of financial assurance _____
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism _____
- d. Expiration date of mechanism _____
- e. Is instrument adequate? Yes ☐ No ☐ NA ☐

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? ☒ Yes ☐ No ☐ NA ☐
- a. Type of financial assurance FINANCIAL TEST
- b. Amount of closure costs \$1,756,250
1. Date of most recent adjustment _____
- c. Effective date of mechanism SEPT. 30, 1990
- d. Expiration date of mechanism SEPT. 31, 1991
- e. Is instrument adequate? ☒ Yes ☐ No ☐ NA ☐

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? ☒ Yes ☐ No ☐ NA ☐
- a. Type of financial assurance _____
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism _____
- d. Expiration date of mechanism _____
- e. Is instrument adequate? Yes ☐ No ☐ NA ☐

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? Yes ☒ No ☐ NA ☐
- a. Type of assurance _____
- b. Is amount at least \$1 million per occurrence, \$2 million annual aggregate? Yes ☐ No ☐ NA ☐
- c. Effective date of mechanism _____

3. If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following:

a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure?

___Yes ___No ☒ NA

b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the groundwater quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1?

___Yes ___No ☒ NA

d. Expiration date of mechanism _____

2. Is facility required to provide liability coverage
for non-sudden accidental occurrences?

___ Yes ☒ No ___ NA

a. Type of assurance _____

b. Is amount at least \$3 million per occurrence, \$6
million annual aggregate?

___ Yes ☒ No ___ NA

c. Effective date of mechanism _____

d. Expiration date of mechanism _____

CHCKLIST:lr



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

January 22, 1991

FILE COPY

CERTIFIED MAIL NO. P 444 547 397

Mr. J. D. Clayton, Plant Manager. Koppers Industries, Inc.
P. O. Box 160
Tie Plant, Mississippi 38960

Dear Mr. Clayton:

Re: RCRA Inspection of December 11,
1990

Enclosed please find an inspection report and checklist that was completed as a result of a Compliance Evaluation Inspection at Koppers Industries, Inc. on December 11, 1990. This inspection revealed the following apparent violations of the Mississippi Hazardous Waste Management Regulations (MHWMR) and Mississippi Hazardous Waste Permit No. 88-543-01:

1. MHWMR 264.14 and MHWMP 88-543-01, Attachment I and Appendix D: Failure to maintain security devices. No signs posted or fence installed.
2. MHWMR 264.15 and MHWMP 88-543-01 Attachment I, Appendix D: Failure to follow the Post-Closure inspection form developed for Post-Closure care maintenance.

By February 8, 1991, a report should also be submitted, as discussed in Section 10 of the accompanying RCRA Inspection Report, concerning soil piles in the southern portion of the facility.

We request that you respond to these apparent violations within 10 days of receipt of this letter. This response should contain: (1) actions that have been taken to correct the violations, (2) schedule for correcting the violations, or (3) reasons that you believe the alleged violation(s) did not exist. The Office will review this information before determining if further action including a penalty is warranted. Section 17-17-29 of the Mississippi Code Annotated (Supp. 1989) allows assessments of penalties not more than \$25,000 per day per violation. Failure to submit this information may result in enforcement action.

If you have any questions, do not hesitate to contact me at (601)
961-5171.

Sincerely,

A handwritten signature in dark ink, appearing to read "Thad Hopper", with a long horizontal flourish extending to the left.

Thad Hopper
Hazardous Waste Division

Enclosures

pc: Mr. James H. Scarbrough, EPA (w/enclosures)
Ms. Jane M. Patarcity, Beazer East, Inc. (w/enclosures)

RCRA Inspection Report

1. Inspector and Author of Report

Thad Hopper, Mississippi Office of Pollution Control (OPC)

2. Facility Information

Koppers Industries, Inc. (Beazer East, Inc.)
P.O. Box 160
Tie Plant, Mississippi 38960

3. Responsible Company Official

Mr. J. D. "Rock" Clayton, Plant Manager, Kopper Industries, Inc.
(KII)

4. Inspection Participants

Mr. Thad Hopper, OPC
Mr. Gary McLelland, General Yard Foreman, KII

5. Date and Time of Inspection

December 11, 1990 11:00 a.m. CST

6. Applicable Regulations

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 262, 264, 268, and Mississippi Hazardous Waste Management Permit No. 88-543-01.

7. Purpose of Inspection

A Comprehensive Monitoring Evaluation (CME) was performed. This report addresses the Compliance Evaluation Inspection (CEI) portion of the CME. The CEI was conducted to determine the facility's overall compliance with applicable Mississippi Hazardous Waste Management Regulations and the facility's Hazardous Waste Management Permit. Evaluation of the facility's compliance with applicable groundwater monitoring requirements of MHWMR Part 264, Subpart F, and MHWMP 88-543-01 will be forwarded under a separate cover letter.

8. Facility Description

KII is a wood treating facility located in Tie Plant, Mississippi, which is approximately five miles southeast of Grenada, Mississippi. The facility uses creosote and pentachlorophenol to treat wood products for railroads, construction industries,

utilities, and others. Ties, poles, and lumber are received mainly by rail and are stored onsite.

Koppers Company, Inc. was acquired by Beazer Materials and Services (BMS) on December 28, 1988. BMS subsequently sold the division, of which the Tie Plant Mississippi plant was a part, to a management group to form Koppers Industries, Inc (KII). In April, 1990, BMS changed its name to Beazer East, Inc (BEI). RCRA regulated units at the facility consist of a closed surface impoundment, a less than 90 day hazardous waste storage area, and a boiler ash landfarm. KII is a generator with a less than 90 day hazardous waste storage area, and owner of the closed surface impoundment and boiler ash landfarm (BALF). BEI is the operator of the surface impoundment and BALF. Beazer East, Inc. provides financial assurances for post-closure.

The facility has been issued a full RCRA permit. The state issued MHWMP No. 88-543-01 on June 28, 1988, for post-closure care of the surface impoundment. EPA issued the 1984 Hazardous and Solid Waste Amendments (HSWA) portion of the RCRA permit June 14, 1988, requiring KII to investigate releases of hazardous waste or hazardous constituents from solid waste management units. Other permits issued to the facility include Mississippi Air Operating Permit No. 0960-00012 for operation of the plant's boiler and Mississippi Industrial Pretreatment permit PT90300 to discharge wastewater into the Grenada POTW.

Hazardous wastes which are generated and stored at the facility are bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol (K001), waste creosote (U051), and waste pentachlorophenol (F027). Both hazardous and nonhazardous are stored in the less than 90 day storage area.

The closed surface impoundment was formerly part of the wastewater treatment system and handled K001 listed hazardous waste. The unit was certified closed on January 3, 1990 and is now in post-closure. K001 constituents have been detected in monitoring wells upgradient and downgradient of the surface impoundment. Wastewater is currently routed through an oil/water separator and an activated sludge treatment system, before being discharged to the City of Grenada POTW.

Prior to October, 1987, K001, U051, and F027 wastes were burned in a boiler (for thermal conversion of wood and various wastes to steam). The ash from this process is a hazardous waste. Before October 27, 1987, these ashes were deposited at a boiler ash landfarm (BALF). Waste sludge from two surface impoundments (which closed prior to November, 1980, and are now SWMUS) was also landfarmed at this site. The BALF was certified closed on June 27, 1990, and a groundwater quality assessment is being conducted to address off-site contamination. Once the off-site assessment is complete, the BALF will be incorporated into the existing RCRA permit. K001, U051, and F027 are no longer burned as fuel for the

boiler. The facility now uses a mixture of process creosote (bottoms from work tanks) referred to as "fuel additive", wood chips and wood debris. The ash is deposited in the county sanitary landfill.

In addition to the regulated units at the facility, 13 SWMUS have been identified. A PHASE II RCRA Facility Investigation (RFI) report submitted by KII to assess the extent of releases from SWMUS is now under review by the state and EPA. Submission of this workplan also constitutes compliance with Mississippi Commission of Environmental Quality Order No. 1208-87 requiring investigations of releases from SWMUS.

9. Findings

A visual site inspection, record review, and an evaluation of the groundwater monitoring system (including observation of sampling at monitoring wells R-7 and R-8), were conducted at the facility. Results of the groundwater portion of the CME will be submitted under a separate cover letter.

The less than 90 day storage area contained only bulk, crystalline pentachlorophenol product. Appropriate warning signs were in place. The cap of the closed surface impoundment was intact, with no settling or erosion noted, and monitoring wells associated with the impoundment appeared in good condition. The impoundment area was unfenced, and no facility-wide means of security is provided. Attachment I, Post-Closure plans, requires security to be maintained, and Appendix D to Attachment I, the Post-Closure care checklist, includes a fence and signs to be routinely inspected. Monitoring wells for the BALF were in good condition, and no erosion or settling of the cap was observed. The BALF was also unfenced; however, the approved closure plan did not include security provisions.

Several piles of soil, removed during installation of a new drip track and excavated during remedial activities were noted in the southern portion of the facility. Some of this soil was being stored under a shed, while other piles had been placed on plastic, but were exposed to the elements.

Records reviewed included inspection reports, personnel training, waste manifests, financial and liability assurance documents, closure and post-closure plans, contingency plans, the RCRA permit, and groundwater analytical data. All records were complete and up to date with the exception of post-closure inspection records for the surface impoundment. The inspection schedule currently completed is for an operating surface impoundment and is not the form stipulated in the RCRA permit.

10. Conclusions

The facility was in apparent violation of the following Mississippi Hazardous Waste Management Regulations and Conditions of the facility's RCRA permit:

MHWMR 264.14 and MHWMP 88-543-01 Attachment I (Post-Closure Requirements) and Appendix D. Failure to maintain security devices. No signs posted or fence installed.


MHWMR 264.15 and MHWMP 88-543-01 Attachment I, Appendix D. Failure to follow the Post-Closure inspection form developed for Post-Closure care maintenance.

In addition, a report should be submitted detailing facts concerning the soil piles stored in the southern portion of the facility. This report should include approximate amount of material stored, material source location, and results of analytical testing, length of time material has been stored, and proposed final disposition. If the material has not been analyzed for TCLP characteristics, this test should be performed and the results submitted.

11. Signed

 1/23/91

12. Approval

 1/23/91

cc: Mr. James H. Scarbrough, EPA
Ms. Jane M. Patarcity, Beazer East, Inc.

ENGINEERING CHART

FILE

APPN

DATE

BY

SUBJECT

Koppers BIF
Steve Smith 412/227-2677

- 1) Cause for Modification 270.41(a)(3)
- 2) Adding boiler is Class 3 modification 270.42(d)(2)(i)(i)
- 3) Requirement to submit Class 3 modification by 2/21/92 270.42(g)(1)(iv)
- 4) Pre-burn storage facility has same status as boiler 266.101(c)

Communication between Dudley Deville and Anaxis Dahan of Woodward-Clyde, dated 8/12/91 to Elisabeth Katchum, indicated Woodward Clyde understood Koppers was permitted and consequently a revised Class 3 Permit Mod was due Feb 21, 1992.

RCRA Inspection Report

1. Inspector and Author of Report

Gail Macalusa
Environmental Engineer
Bureau of Pollution Control

2. Facility Information

Koppers Industries, Inc. (Beazer Materials & Services)
P.O. Box 160
Tie Plant, Mississippi 38960

3. Responsible Company Official

Mr. J. D. "Rock" Clayton, Plant Manager
Koppers Industries, Inc. (KII)

4. Inspection Participants

Mr. J. D. "Rock" Clayton, KII
Mr. Gary McClelland, KII
Ms. Gail Macalusa, BPC

5. Date and Time of Inspections

February 22, 1990; 10:00 a.m. CST

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 262, 264, 265, and 268 and Mississippi Hazardous Waste Management Permit No. 88-543-01.

7. Purpose of Inspection

This was a Compliance Evaluation Inspection (CEI) to determine the facility's overall compliance with applicable regulations and the facility's MHWMR Permit.

8. Facility Description

KII is located in Tie Plant, Mississippi, which is approximately five miles southeast of Grenada, Mississippi. The facility is a wood treating facility which uses creosote and pentachlorophenol in the pressure treatment of wood products for railroads, construction industry, utilities, and others. Raw material and product arrive and leave by rail and truck.

Koppers Company, Inc. was acquired by Beazer Materials and Services, Inc. (BMS) on December 28, 1988. BMS sold the division, of which the Grenada, Mississippi plant was a part, to a management group to form Koppers Industries, Inc. (KII).

KII is a generator with a less than 90 day storage area, and owner of the surface impoundment and boiler ash landfarm (BALF). BMS is the operator of the surface impoundment and BALF.

The surface impoundment is permitted and has been modified to reflect KII as owner and BMS as operator. The unit was certified closed on January 3, 1990, and is now in post-closure. K001 constituents have been detected at significant levels in both the upgradient and downgradient wells. The process area has been classified as a SMU, and is located upgradient to the surface impoundment, close to the upgradient well. This area may be the source of contamination. The Mississippi Department of Environmental Quality requested BMS to submit a workplan, in accordance with Mississippi Commission Order No. 1208-87, for a facility-wide assessment to fully characterize the extent of contamination. The workplan was submitted in January, 1990, and is currently under review by MDEQ and EPA.

The BALF is scheduled to be certified closed by June 1, 1990. Currently, a groundwater quality assessment is being conducted, in the area of the BALF, to address off-site contamination. The MDEQ is awaiting the results of the assessment before proceeding to include this unit in the existing permit.

The hazardous wastes which are generated and stored at the facility are bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol (K001). Waste creosote (U051) and certain waste pentachlorophenol (F027) are also managed at times. The surface impoundment was formerly operated as a wastewater treatment lagoon and generated the listed hazardous waste K001. Currently, the wastewater is being routed through the wastewater treatment plant, which consists of an oil/water separator and an activated sludge system, before being discharged to the City of Grenada POTW. Prior to October, 1987; K001, U051, and F027 wastes were burned in a boiler (used for thermal conversion of wood and various wastes to steam). The ash from burning these wastes is a hazardous waste. These ashes were deposited at the boiler ash landfarm prior to July, 1987. K001, U051, and F027 wastes are no longer used as fuel for the boiler. Ash from the boiler is now disposed of in the county sanitary landfill. Waste sludge from two impoundments (which closed prior to November 19, 1980, and are now SMU's) was landfarmed at this site prior to the ash disposal. Currently, the boiler ash landfarm is being capped with the waste in place.

9. Findings

A record review was conducted at the facility. Records reviewed included inspection reports, personnel training, waste manifests on received and shipped wastes, financial and liability assurance documents, closure and post-closure plans, the facility contingency plan, and the permit. All records appeared to be complete and up-to-date, with the exception of the groundwater

data. Records of monitoring, testing, and analytical data are not maintained at the facility. According to Mr. Clayton, groundwater data is retained by BMS. This is an apparent violation of Permit Condition IV.H.1. and MHWMR 265.73(b)(6).

A visual site inspection of the storage area, the landfarm, and the capped surface impoundment was conducted. The less than 90 day container/drum storage area contained only non-hazardous waste (bottom creosote sludge from the work tanks at the Little Rock, Arkansas plant) at the time of inspection. Warning signs were visible from every approach. The fence surrounding the landfarm has been removed for closure activities. The monitoring well that had been damaged during closure of the surface impoundment (R-8B) has been repaired.

10. Conclusions

The facility is in apparent violation of Permit Condition IV.H.1., and MHWMR 265.73(b)(6) - failure to maintain monitoring, testing, and analytical data at the facility.

11. Signed

Wm. Stephen Spyer for Gail Newberry

3/20/90
Date

12. Approval

Wm. Stephen Spyer

3/20/90
Date

GM-23:lr

Compliance Evaluation
Inspection
Checklists

Table of Contents

General Site Inspection Form	1
General Facility Checklist	2
Land Disposal Restrictions Checklist	8
Generator Checklist	26
Transporter Checklist	31
Container Checklist	34
Surface Impoundment Checklist	36
Waste Piles Checklist	40
Land Treatment Checklist	43
Landfills Checklist	49
Incinerators Checklist	53
Thermal Treatment Checklist	56
Groundwater Monitoring Checklist	59
Waste Information Sheet	66
List of Appendices	67

Part 1

GENERAL SITE INSPECTION INFORMATION FORM

A. Site Name Koppers Industries Inc B. Street (or other identifier) The Plant Road
 C. City The Plant MS D. State MS E. Zip Code 38960 F. County Name DeSoto

G. Site Operator Information

1. Name 1. Koppers Industries Inc 2. Telephone Number 1. (412) 227-2612
2. Berger Materials & Service 2. (412) 227-2690
 3. Street 1. 436 S. 1st St 4. City Pittsburgh 5. State PA 6. Zip Code 15219
2. 936 S. 1st St

H. Site Description

Wood Preserving

I. Type of Ownership

1. Federal 2. State 3. County 4. Municipal 5. Private

J.

1. Generator 2. Transporter 3. Treatment 4. Storage 5. Disposal

K. Regulatory Status

Landfill 1. Interim Status 3. Part B Permit Application Submitted
Surface Imp. 2. Permitted Facility 4. Part B Permit Application in Preparation

L.

1. Principal Inspector Name Dail Macaluso 3. Organization MS. DEQ
 2. Title Environmental Engineer in Training 4. Telephone No. (area code and No.) (601) 961-5171

M. Inspection Participants

1. J. D. "Rock" Clayton
 2. Dary McChesland
 3. _____
 4. _____
 5. _____

Part 2

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.?
a. If yes, EPA I.D. No. M S D 0 0 7 0 2 7 5 4 3
If no, explain. _____
☒ Yes ☐ No ☐ NA
2. Has facility received hazardous waste from a foreign source?
a. If yes, has it filed a notice with the Regional Administrator?
☒ Yes ☐ No ☐ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility?
a. If yes, does it include: (264.13) (265.13)
1. Parameters for which each waste will be analyzed? ☒ Yes ☐ No ☐ NA
2. Test methods used to test for these parameters? ☒ Yes ☐ No ☐ NA
3. Sampling method used to obtain sample? ☒ Yes ☐ No ☐ NA
4. Frequency with which the initial analyses will be reviewed or repeated? ☒ Yes ☐ No ☐ NA
5. (For offsite facilities) waste analyses that generators have agreed to supply? ☒ Yes ☐ No ☐ NA
6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:
a. Procedures to be used to determine the identity of each movement of waste. ☒ Yes ☐ No ☐ NA
b. Sampling method to be used to obtain representative sample of the waste to be identified. ☒ Yes ☐ No ☐ NA
4. Does the facility provide adequate security through: (264.14) (265.14)
a. 24-hour surveillance system (e.g., television monitoring or guards)? ☒ Yes ☐ No ☐ NA

OR

(continued)

- b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ☐ Yes ☒ No ☐ NA

Describe _____

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ☐ Yes ☒ No ☐ NA

Describe _____

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- a. Monitoring equipment?
b. Safety and emergency equipment?
c. Security devices:
d. Operating and structural equipment?
e. Types of problems of equipment:

☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

1. Malfunction
2. Operator error
3. Discharges

☐ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

6. Does the owner/operator maintain an inspection log?

☒ Yes ☐ No ☐ NA

- a. If yes, does it include:

1. Date and time of inspection?
2. Name of inspector?
3. Notation of observations?
4. Date and nature of repairs or remedial action?

☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.)

☒ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility?

☒ Yes ☐ No ☐ NA

(continued)

Date of most recent training

5/16/89

employees have a yearly training

How long are they kept?

Permanently

a. If yes, do they include:

1. Job title and written job description of each position?
2. Description of type and amount of training?
3. Records of training given to facility personnel?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA

Requirements for Ignitable, Reactive, or Incompatible Waste (264.17) (265.17)

8. Does facility handle ignitable or reactive wastes?

☐ Yes ☒ No ☐ NA

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flame confined to specifically designated locations?

☐ Yes ☐ No ☒ NA

c. Are "No Smoking" signs posted in hazardous areas?

☐ Yes ☐ No ☒ NA

d. Are precautions documented (Part 264 only)?

☐ Yes ☐ No ☒ NA

9. Check containers

a. Are containers leaking or corroding?

☐ Yes ☐ No ☐ NA

b. Is there evidence of heat generation from incompatible wastes?

☐ Yes ☐ No ☒ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) ☐ Yes ☒ No ☐ NA

If yes, use narrative explanation sheet to explain.

(continued)

2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system? ☐ Yes ☒ No ☐ NA

1. Is it easily accessible in case of emergency? ☐ Yes ☐ No ☒ NA

b. Telephone or two-way radio to call emergency response personnel? ☐ Yes ☒ No ☐ NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ☒ Yes ☐ No ☐ NA

d. Water of adequate volume for hoses, sprinklers, or water spray system? ☒ Yes ☐ No ☐ NA

1. Describe source of water deep well in back of property

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35) (265.35) ☒ Yes ☐ No ☐ NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37) ☒ Yes ☐ No ☐ NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (264.37) (265.37) ☐ Yes ☐ No ☒ NA

a. If yes, name primary authority _____

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (264.37) (265.36) ☒ Yes ☐ No ☐ NA

a. Are they readily available to all personnel? ☐ Yes ☒ No ☐ NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37) (265.37) ☒ Yes ☐ No ☐ NA

8. If State or local authorities decline to enter, is this entered in the operating record? (264.37) (265.37) ☐ Yes ☐ No ☒ NA

(continued)

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? (264.53) (265.53) Yes ☒ No ☐ NA ☐
- a. If yes, is it a revised SPCC Plan? Yes ☐ No ☐ NA ☐
- b. Does contingency plan include: (264.52) (265.52)
1. Arrangements with local emergency response organizations? Yes ☐ No ☐ NA ☐
2. Emergency coordinators' names, phone numbers, and addresses? Yes ☐ No ☐ NA ☐
3. List of all emergency equipment at facility and descriptions of equipment? Yes ☐ No ☐ NA ☐
4. Evacuation plan for facility personnel? Yes ☐ No ☐ NA ☐
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) Yes ☐ No ☐ NA ☐

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71) Yes ☐ No ☒ NA ☐
PEPA hazardous waste from work tank
- a. If yes, does the owner/operator retain copies of all manifests? Yes ☐ No ☒ NA ☐
from other facilities for off-site fuel additive program. This waste is manifest.
1. Are the manifests signed and dated and returned to the generator? Yes ☐ No ☐ NA ☐
2. Is a signed copy given to the transporter? Yes ☐ No ☐ NA ☐
2. Does the facility receive any ^{hazardous} waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) Yes ☐ No ☒ NA ☐
- a. If yes, is it accompanied by a shipping paper? Yes ☐ No ☐ NA ☐
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? Yes ☐ No ☐ NA ☐
2. Is a signed copy given to the transporter? Yes ☐ No ☐ NA ☐
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) Yes ☐ No ☒ NA ☐
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? Yes ☐ No ☐ NA ☐
1. If no, has Regional Administrator been notified? Yes ☐ No ☐ NA ☐

(continued)

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73) ☐ Yes ☐ No ☐ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? ☐ Yes ☐ No ☐ NA

2. Methods and dates of treatment, storage, and disposal? ☐ Yes ☐ No ☐ NA

3. Location and quantity of each hazardous waste at each location? ☐ Yes ☐ No ☐ NA

4. Cross-references to manifests/shipping papers? ☐ Yes ☐ No ☐ NA

5. Records and results of waste analyses? ☐ Yes ☐ No ☐ NA

6. Report of incidents involving implementation of the contingency plan? ☒ Yes ☐ No ☐ NA

7. Records and results of required inspections? ☐ Yes ☐ No ☐ NA

8. Monitoring or testing analytical data (Part 264)? ☐ Yes ☒ No ☐ NA

9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ☒ Yes ☐ No ☐ NA

10. Notices of generators as specified in §264.12(b) (Part 264)? ☐ Yes ☐ No ☐ NA

b. Does facility have copy of permit on site? ☒ Yes ☐ No ☐ NA

5. Does the facility submit a biennial report by March 1 every even-numbered year? (264.75) (265.75) ☐ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number? ☐ Yes ☐ No ☐ NA

2. Date and year covered by report? ☐ Yes ☐ No ☐ NA

3. Description/quantity of hazardous waste? ☐ Yes ☐ No ☐ NA

4. Treatment, storage, and disposal methods? ☐ Yes ☐ No ☐ NA

5. Monitoring data under §265.94(a)(2) and (b)(2) (Part 265)? ☐ Yes ☐ No ☐ NA

6. Most recent closure and post-closure cost estimates? ☐ Yes ☐ No ☐ NA

7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ☐ Yes ☐ No ☐ NA

8. Certification signed by owner/operator? ☐ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76) ☐ Yes ☒ No ☐ NA

a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? ☐ Yes ☐ No ☒ NA

7. Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? (264.77) (265.77) ☒ Yes ☐ No ☐ NA

LAND DISPOSAL RESTRICTIONS CHECKLIST

1. Are hazardous wastes land-disposed on site? ("Land disposal" includes placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, concrete vault, or bunker intended for disposal purposes; and placement in or on the land by means of open detonation and open burning where residues continue to exhibit hazardous characteristics). ☐ Yes ☒ No ☐ NA
- a. If yes, are one or more of the following circumstances true:
1. Granted extension from effective date pursuant to §268.5? ☐ Yes ☐ No ☐ NA
 2. Granted exemption from a prohibition pursuant to a petition under §268.6? ☐ Yes ☐ No ☐ NA
 3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? ☐ Yes ☐ No ☐ NA
 4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? ☐ Yes ☐ No ☐ NA
2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? ☐ Yes ☐ No ☐ NA
3. Are there active surface impoundments used for treatment of hazardous wastes? ☐ Yes ☐ No ☐ NA
- a. If yes, does the unit's design and operation meet the requirements set forth in §268.4? ☐ Yes ☐ No ☐ NA
4. Has the facility sought exemption from any prohibition under Subpart C of §268 for the disposal of a restricted hazardous waste? ☐ Yes ☐ No ☐ NA
- a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? ☐ Yes ☐ No ☐ NA
5. Has the facility determined whether it generates a restricted waste through waste analysis? (§268.7) ☐ Yes ☐ No ☐ NA
- a. If yes, is the facility, in fact, handling a restricted waste(s)? ☐ Yes ☐ No ☐ NA

(continued)

- b. If yes, does the restricted waste require treatment? ☐ Yes ☐ No ☐ NA
- c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? ☐ Yes ☐ No ☐ NA
6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? (268.10) ☐ Yes ☐ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? ☐ Yes ☐ No ☐ NA
 2. The solvent waste is generated from a CERCLA response corrective action? ☐ Yes ☐ No ☐ NA
 3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. ☐ Yes ☐ No ☐ NA
- b. If no, have any of these restricted wastes been land-disposed (except in an injection well) since November 8, 1986? ☐ Yes ☐ No ☐ NA
7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? ☐ Yes ☐ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. Wastes are treated to meet standards of Subpart D of §268? ☐ Yes ☐ No ☐ NA
 2. Wastes are disposed of at a facility that has been granted a petition? ☐ Yes ☐ No ☐ NA
 3. An extension has been granted? ☐ Yes ☐ No ☐ NA
- b. If no, will these restricted wastes be land disposed after November 8, 1988? ☐ Yes ☐ No ☐ NA
8. Are restricted wastes being treated? ☐ Yes ☐ No ☐ NA
- a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? ☐ Yes ☐ No ☐ NA

**RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST**

I. HANDLER IDENTIFICATION

A. Konne Industries Inc B. Tie Plant MS
 C. Tie Plant MS D. 38960 E. Delta F. County Name
 G. Wood Preserving
 H. MSD007 027543
 I. J.D. Clayton (601) 226-9589

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) P001, P002, P004, or P005 ☐ Yes ☒ No

(ii) P003 ☐ Yes ☒ No

If an P003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☒ No

b. Source of the above: Form 8700-12 ☒; Part A ☒; Part B ☐; Biennial/Annual Reports ☐
 other (specify) Previous CEIS

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: _____

2. Dioxin wastes

- a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ☒ Yes ☐ No
(ii) F028 ☒ Yes ☐ No

F027

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002 ☐ Yes ☒ No
(ii) D004 - D011 ☐ Yes ☒ No

- b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ☐ Yes ☒ No

[California waste standards are presented as Appendix C]

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ☐ Yes ☒ No

- d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? ☐ Yes ☒ No N/A

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ☐ Yes ☒ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

☐ Yes ☒ No

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

American Wood Preservers Association Publication of analysis

- f. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:

V051 - Cresote

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

V051

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? Yes No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? Yes No

- e. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? Yes ✓ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? Yes No

3. P Solvents - -

- a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☐ Yes ☒ No *N/A*

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?

☐ Yes ☒ No *N/A*

5. ^{and Second} First, Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?

☐ Yes ☒ No *NA*

- b. Does the facility handle K061 wastes?

☐ Yes ☒ No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (>15% Zn) [§268.7(a)] [§268.41(a)]?

☐ Yes ☒ No *NA*

- c. Does the facility handle K101 or K102 wastes?

☐ Yes ☒ No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?

☐ Yes ☒ No

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

☐ Yes ☒ No

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes Yes No

(1) List wastes for which "applied knowledge" was used:

X001, V051, F027

b. TCLP Yes No

(1) List wastes for which "TCLP" was used:

(ii) lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? Yes No

If yes, list: _____

c. Total waste analysis Yes No

d. If files were retained, describe content and basis of applied knowledge determination:

Waste Analysis Report for X001, V051, F027
Waste Analysis Report for X001, V051, F027

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

- e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed? [§264.13(a)(3)(i) or §265.13(a)(3)(i)]? Yes No

2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: _____

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] Yes No

D. Management

- ## 1. Onsite management

- a. Were restricted wastes managed onsite? Yes No

If no, go to "2".

- b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? Yes ☒ No ☐

If yes, TSDF checklist must be completed.

- ## 2. Offsite Management

- a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(1) **HFA Hazardous Waste Number?** Yes No

(ii) Corresponding treatment standard? Yes No

(iii) Manifest number? Yes No

(iv) Waste analysis, if available? Yes No

Identify offsite treatment facilities _____

- b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:
- (i) EPA hazardous waste I.D. number? ☐ Yes ☐ No
 - (ii) Corresponding treatment standard? ☐ Yes ☐ No
 - (iii) Manifest number ☐ Yes ☐ No
 - (iii) Certification regarding waste and that it meets treatment standards? ☐ Yes ☐ No

Identify land disposal facilities receiving the BDAT certified wastes _____

- c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:
- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No
 - (ii) Corresponding Treatment Standards? ☐ Yes ☐ No
 - (iii) All applicable prohibitions? ☐ Yes ☐ No
 - (iv) The manifest number? ☐ Yes ☐ No
 - (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No
 - (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? ☐ Yes ☐ No

List all prohibited wastes for which records are not provided per above [§268.7(a)(b):

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

- d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ☒ Yes ☐ No

Applicable prohibitions? ☒ Yes ☐ No

The manifest number? ☒ Yes ☐ No

Waste analysis data, where available? ☒ Yes ☐ No

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposal in a landfill or surface impoundment [§268.33(f)]? ☐ Yes ☒ No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ☐ Yes ☒ No

- (iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No

- (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)]? ☒ Yes ☐ No

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? ☐ Yes ☐ No

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☒ No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? ☐ Yes ☐ No

If yes, TSD Checklist must be completed.

**(. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, waste-water treatment tanks, etc.)**

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☒ Yes ☐ No

If yes, list type of treatment unit and processes

KOD

If yes, TSD checklist must be completed.

Part V

Section I - Less-than-Ninety Day Storage
(Complete one sheet for each area)

Section NA ____

1. Source/Area: Work Tank
2. Type(s) of waste: cruciate
3. Condition of containers: Good

- a. Containers closed?
- b. Containers properly labelled?
- c. Accumulation dates?
- d. Area inspected?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	NA	<input type="checkbox"/>
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA	<input type="checkbox"/>
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA	<input type="checkbox"/>
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	NA	<input type="checkbox"/>

All of the drums were from Little Rock Arkansas, and contained waste from the work tank (not a RCRA hazardous waste) for the fuel additive program.

Waste Information Worksheet
(To be filled out for each hazardous waste)

Waste Name: Bottom Sediment Sludge from treatment of
Waste Code: K001 WW from wood processing

Process Generating Waste: Treatment of wastewater
from wood processing process

How was determination made?

☒ Knowledge of Waste. Describe. _____

☐ Testing. Describe. _____

Waste Generation Rate (may be estimated) ~ 30 drums/yr.

Disposal Procedure: _____

Site/Firm: Rollins

Is waste subject to requirements of MHWMR 268? Yes ☒ No ☐

Describe. just this waste

Is waste excluded under MHWMR 261.4? Yes ☐ No ☒

Describe. _____

Waste Information Worksheet
(To be filled out for each hazardous waste)

Waste Name: Concrete
Waste Code: U051

Process Generating Waste: concrete spill cleanup

How was determination made?

☒ Knowledge of Waste. Describe. _____

☐ Testing. Describe. _____

Waste Generation Rate (may be estimated) _____

Disposal Procedure: _____

Site/Firm: Collins

Is waste subject to requirements of MHWMR 268? Yes ☐ No ☒

Describe. Soft hammer test third

Is waste excluded under MHWMR 261.4? Yes ☐ No ☒

Describe. _____

Waste Information Worksheet
(To be filled out for each hazardous waste)

Waste Name: Pentachlorophenol
Waste Code: F027

Process Generating Waste: _____

How was determination made?

☒ Knowledge of Waste. Describe. _____
☐ Testing. Describe. _____

Waste Generation Rate (may be estimated) _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? Yes ☐ No ☐
Describe. Slurry containing waste

Is waste excluded under MHWMR 261.4? Yes ☐ No ☐
Describe. _____

N/A

RCRA LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

A. Facility Name Koppers B. Street (or other identifier) _____
C. City _____ D. State _____ E. Zip Code _____ F. County Name _____
G. Nature of business; identification of industrial and waste management operations;
relevant SIC codes _____
H. EPA ID # _____

I. Facility Contact (Name and Phone Number) _____

II.A. For onsite facilities, complete the generator checklist

Comments

B. General Facility Standards

1. General

a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?
no

b. Describe the frequency of sampling conducted by the facility.
if a process change

2. Treatment Facilities

a. Has the treatment facility revised its waste analysis plan [§268.7(b)] to meet the requirements of §264.13 or §265.13? Yes No

(i) Is the treatment facility conducting TCLP tests for wastes specified in Appendix A (i.e., those prohibited wastes subject to treatment standards expressed as waste extracts) per 286.7(b)(1)? Yes No

N/A

- (ii) Is the treatment facility using the paint filter test for the California waste residues [§268.7(b)(11)]? ☐ Yes ☐ No
- (iii) Is the treatment facility testing the pH of California waste residues? ☐ Yes ☐ No
- (iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [§268.7(b)(3)]? ☐ Yes ☐ No
- (v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [§268.7(b)(1)]? ☐ Yes ☐ No

3. Land Disposal Facilities

- a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ☐ Yes ☐ No
- b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [§268.7(c)(2)]? ☐ Yes ☐ No
- c. Are they being tested in conformance with the frequency specified in the waste analysis plan [§268.7(c)(3)]? ☐ Yes ☐ No
- d. Are the appropriate tests (TCLP vs. total waste) being used [§268.7(c)(2)]? ☐ Yes ☐ No

C. Storage (§268.50)

1. a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ☒ Yes ☐ No

If no, go to "c."

- b. Are all containers clearly marked to identify content and date(s) entering storage [§268.50(a)(2)]? ☐ Yes ☐ No

None there at time of inspection

c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [§264.73 or §265.73]? Yes No

d. Do operating records agree with container labeling? [§268.50(a)(2) or §264.73 or §265.73] Yes No N/A

e. Is waste exceeding treatment standards stored for less than 1 year? Yes No ✓

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? Yes No

If yes, state how: _____

f. Was/is waste exceeding treatment standards stored for more than one year? Yes No ✓

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

D. Treatment in Surface Impoundments (§268.4)

1. Are prohibited wastes placed in surface impoundments for treatment? Yes No ✓

If no, go to E.

2. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [§268.4(b) and §268.3]? Yes No

3. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency [§268.4(a)(4)]? Yes No

4. Have the minimum technology requirements been met [§268.4(a)(3)]? Yes No

a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [§268.4(a)(3)(iii)]? Yes No

5. Have the ~~Subpart F~~ ground-water monitoring requirements been met [§268.4(a)(3)]? ☐ Yes ☐ No
6. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [§268.4(a)(2)]? ☐ Yes ☐ No
7. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? ☐ Yes ☐ No
8. Provide the frequency of analyses conducted on treatment residues: _____

Does the frequency meet the requirements of the waste analysis plan [§264.13 or §265.13]? ☐ Yes ☐ No
9. Does the operating record adequately document the results of waste analyses performed [§264.13 or §265.13]? ☐ Yes ☐ No
10. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [§268.4(a)(2)(ii)]? ☐ Yes ☐ No
 - a. If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) ☐ Yes ☐ No
11. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No
12. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No
 - a. Were these residues subject to a valid 268.8 certification? ☐ Yes ☐ No
13. When removed, were wastes treated prior to disposal? ☐ Yes ☐ No
 - a. If yes, are waste residues treated on or offsite? ☐ Onsite ☐ Offsite

1. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)?

✓ Yes No

2. Describe the treatment processes, including exempt processes.

treatment of wastewater from wood preserving processes

3. Does the facility treat soft hammered wastes?

 Yes No

a. If yes, is treatment occurring as described in the generator's certification/demonstration [§268.8(c)(1)]? Yes No

Yes No

b. Did the treatment facility certify he treated the soft hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]? Yes No

Yes **No**

c. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [§268.8(c)(2)]? Yes No

Yes No

4. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [§268.7(c)(2)]? Yes No

☒ **Yes** ☐ **No**

5. Describe frequency of testing of treatment residuals.

when process changes

6. Was dilution used as a substitute for treatment [§268.3]? Yes

Yes ~~No~~

7. Are all notifications, certifications, and results of waste analyses kept in the operating record [§264.73(b) or §265.73(b)]? Yes No

8. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [§268.7(b)(4) and (5) and §268.8(c)(1)]? Yes No *N/A*

9. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [§268.7(b)(6)]? Yes No *N/A*

F. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments* waste piles, vells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker?) Yes No *N/A*

2. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [§§268.7(c)(1); 268.7(a),(b)]? Yes No

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)(2)]? Yes No

If yes, was the frequency of testing as required by the facility's waste analysis plan [§264.13 or §265.13]? Yes No

4. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]? Yes No

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][§268.30(d), §268.31(d), §268.32(g), §268.33(e)]? Yes No

*Do not include SIs addressed under Section "D" of this checklist.

5. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed?

___ Yes ___ No

If yes, have the minimum technology requirements been met for all units receiving such wastes [§268.30(c), §268.31(c), §268.32(d), §268.33(d)]?

___ Yes ___ No

6. Were adequate records of disposal maintained [§264.73(b) or §265.73(b)]?

___ Yes ___ No

7. If wastes subject to a nationwide variance, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal [§264.73(b) or §265.73(b)]?

___ Yes ___ No

8. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports?

___ Yes ___ No

9. If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [§268.8(a)(2)-(a)(4)]?

___ Yes ___ No

- a. Is the facility disposing of any soft hammer wastes that may be classified as California wastes?

___ Yes ___ No

- b. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban?

___ Yes ___ No

Part 4

GENERATOR'S CHECKLIST

___ Part NA

Section A - EPA Identification No.

1. Does generator have EPA I.D. No? (262.12) Yes ___ No ___ NA
- a. If yes, EPA I.D. No. MSD007027543

Section B - Manifest

1. Does generator ship waste offsite? (262.20) Yes ___ No ___ NA
- a. If no, do not fill out Sections B and D.
- b. If yes, identify primary offsite facility(s). Use *following* narrative explanation sheet.
2. Does generator use manifest? (262.20) Yes ___ No ___ NA
- a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? ___ Yes ___ No ___ NA
1. If yes, does generator indicate this when sending waste to a TSD facility? Yes ___ No ___ NA
- b. If yes, does manifest include the following information?
1. Manifest document No. ___ Yes ___ No ___ NA
2. Generator's name, mailing address, telephone No. ___ Yes ___ No ___ NA
3. Generator EPA I.D. No. ___ Yes ___ No ___ NA
4. Transporter Name(s) and EPA I.D. No.(s) ___ Yes ___ No ___ NA
5. a. Facility name, address, and EPA I.D. No. ___ Yes ___ No ___ NA
- b. Alternate facility name, address, and EPA I.D. No. ___ Yes ___ No ___ NA
- c. Instructions to return to generator if undeliverable ___ Yes ___ No ___ NA
6. Waste information required by DCE - shipping name, quantity (weight or vol.), containers (type and number) ___ Yes ___ No ___ NA

(continued)

7. Emergency information (optional)
(special handling instructions, telephone No.) ☐ Yes ☐ No ☐ NA

8. Is the following certification on each manifest form? ☐ Yes ☐ No ☐ NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ☐ No ☐ NA

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? ☐ Yes ☐ No ☐ NA
2. Who signed for generator?

Name Dary McCallister Title _____

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☐ Yes ☐ No ☐ NA
2. Who signed and dated for transporter?

Name _____ Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No ☐ NA

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No ☐ NA

e. Does generator retain copies for 3 years? ☒ Yes ☐ No ☐ NA

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ☒ Yes ☐ No ☐ NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.) _____

(continued)

2. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ☒ Yes ☐ No ☐ NA
- a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____
- b. Does generator determine characteristics by testing or by applying knowledge of processes? applying knowledge
1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☐ Yes ☐ No ☐ NA
- a. If equivalent test methods used, attach copy of equivalent methods used.
3. Are there any other solid wastes generated by generators? ☒ Yes ☐ No ☐ NA
- a. If yes, did generator test all wastes to determine nonhazardous characteristics? ☒ Yes ☐ No ☐ NA
1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).
- _____
- _____
- _____

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) ☐ Yes ☐ No ☐ NA
2. a. Are containers to be shipped leaking or corroding? ☐ Yes ☐ No ☐ NA
- b. Use sheet to describe containers and condition.
- c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) ☐ Yes ☐ No ☐ NA
3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? ☐ Yes ☐ No ☐ NA
4. Does generator mark each package in accordance with 49 CFR 172? ☐ Yes ☐ No ☐ NA

(continued)

5. Is each container of 110 gallons or less marked with the following label? (262.32) ☐ Yes ☐ No ☐ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33) ☒ Yes ☐ No ☐ NA

7. Accumulation time: (262.34)

- a. Are containers used to temporarily store waste before transport? ☐ Yes ☐ No ☐ NA

1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) ☐ Yes ☐ No ☐ NA

- b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ☐ Yes ☐ No ☐ NA

2. If yes, with what frequency? _____

- c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ☐ Yes ☐ No ☒ NA

NOTE: If tanks are used, fill out checklist for tanks.

- d. Are the containers labeled and marked in accordance with Section D-3, -4, and -5 of this form? ☐ Yes ☐ No ☐ NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

- e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ☐ Yes ☐ No ☒ NA

8. Describe storage area. Use photos and narrative explanation sheet.

(continued)
OSWER DIR. No. 9938.2A

March 1988

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?
- | | | | |
|-------------------------------------|---|-----------------------------|-----------------------------|
| a. Manifests and signed copies from | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| b. Biennial reports | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| c. Exception reports | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| d. Test results | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
2. Where are the records kept (at facility or elsewhere)?
- Facility
3. Who is in charge of keeping the records?
- | | | | |
|------|---------------|-------|-------------|
| Name | J.D. Crawford | Title | Bay Manager |
|------|---------------|-------|-------------|

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator? ☐ Yes ☐ No ☐ NA
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No ☐ NA
- b. Is this waste manifested and signed by a foreign cosignee? ☐ Yes ☐ No ☐ NA
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No ☐ NA

Section G - Short-Term Storage (262.34(a))

1. Does generator store wastes on site for less than 90 days? ☒ Yes ☐ No ☐ NA
2. Does generator have the waste properly stored? ☒ Yes ☐ No ☐ NA
3. Does generator have the accumulation date marked on the container and visible for inspection? (262.34(a)(2)) ☐ Yes ☐ No ☒ NA
4. Does the generator have each container or tank labeled clearly with the words "Hazardous Waste"? (262.34(a)(3)) ☐ Yes ☐ No ☒ NA

Section H - Satellite Accumulation (262.34(c))

1. Does generator utilize satellite accumulation? ☐ Yes ☐ No ☐ NA
- List source & waste: _____
2. Does generator comply with 265.171, 265.172, and 265.173(a)? ☐ Yes ☐ No ☐ NA

TRANSPORTERS CHECKLISTSection A - EPA I.D. No.

1. Does transporter have an EPA I.D. No.? (263.11) ☐ Yes ☐ No ☐ NA
- a. If yes, what is EPA I.D.? _____

Section B - Transfer Facility Requirements (263.12)

1. Does transporter store wastes on site? ☐ Yes ☐ No ☐ NA
- a. If yes, does transporter store wastes longer than 10 days? ☐ Yes ☐ No ☐ NA

Section C - Manifests

1. Does transporter use manifests? (263.20) ☐ Yes ☐ No ☐ NA
- a. If yes, are manifests signed and dated? ☐ Yes ☐ No ☐ NA
- b. Does transporter return signed copies of manifests to generators? ☐ Yes ☐ No ☐ NA
- c. Does transporter carry manifests with waste shipments? ☐ Yes ☐ No ☐ NA
- d. Does transporter obtain delivery date and signature of owner/operator at delivery? ☐ Yes ☐ No ☐ NA
- e. Does transporter retain copies? ☐ Yes ☐ No ☐ NA
- f. Does transporter give remaining copies to accepting transporter or facility? ☐ Yes ☐ No ☐ NA
- g. Is transporter a water (bulk shipment) transporter? ☐ Yes ☐ No ☐ NA
1. If yes, is waste delivered to receiving facility by water? ☐ Yes ☐ No ☐ NA
2. Does transporter carry a shipping paper with the waste containing all information required on the manifest (excluding EPA I.D. numbers, generator certification, and signatures)? ☐ Yes ☐ No ☐ NA
3. Does transporter obtain delivery date and handwritten signature of owner/operator of designated facility on manifest or shipping paper? ☐ Yes ☐ No ☐ NA
4. Does transporter retain copies of shipping papers or manifests, in accordance with §263.22? ☐ Yes ☐ No ☐ NA

(continued)

- h. Is transporter a rail transporter? ☐ Yes ☐ No ☐ NA
1. If yes, when accepting waste from a nonrail transporter, does rail transporter sign and date manifest acknowledging acceptance of waste? ☐ Yes ☐ No ☐ NA
 2. Does rail transporter return a signed copy of manifest to nonrail transporter? ☐ Yes ☐ No ☐ NA
 3. Does rail transporter forward manifest copies to:
 - a. The next nonrail transporter? ☐ Yes ☐ No ☐ NA
 - b. Designated receiving facility (if reached by rail)? ☐ Yes ☐ No ☐ NA
 - c. The last rail transporter designated to handle the waste in the U.S.? ☐ Yes ☐ No ☐ NA
 4. Does rail transporter retain a copy of manifest? ☐ Yes ☐ No ☐ NA
 5. Does rail transporter ensure that a shipping paper accompanies the hazardous waste and contains all information required on manifest (excluding EPA I.D., generator certification, and signatures)? ☐ Yes ☐ No ☐ NA
 6. Does rail transporter obtain delivery date and handwritten signature of owner/operator of designated facility or the next nonrail transporter on manifest? ☐ Yes ☐ No ☐ NA
 7. Does rail transporter retain a copy of the manifest or signed shipping paper? ☐ Yes ☐ No ☐ NA
- i. Does transporter transport waste outside of the U.S.? ☐ Yes ☐ No ☐ NA
1. If yes, does the transporter:
 - a. Indicate on manifests the date that shipment left the U.S.? ☐ Yes ☐ No ☐ NA
 - b. Sign manifest and retain one copy? ☐ Yes ☐ No ☐ NA
 - c. Return a signed copy of manifest to generator? ☐ Yes ☐ No ☐ NA

Section D - Compliance With the Manifest (263.20)

1. Does transporter deliver entire shipment of hazardous waste to:
 - a. Designated facility listed on manifest? ☐ Yes ☐ No ☐ NA
 - b. Alternate designated facility, if emergency prevents delivery to designated facility? ☐ Yes ☐ No ☐ NA
 - c. Next designated transporter? ☐ Yes ☐ No ☐ NA
 - d. Place outside U.S. designated by generator? ☐ Yes ☐ No ☐ NA
 - e. If no, does transporter contact generator for further directions, and then revise manifest accordingly? ☐ Yes ☐ No ☐ NA

(continued)

Section E - Recordkeeping (263.22)

1. Does transporter keep a copy of manifest signed by generator, himself, and next designated transporter for 3 years? ☐ Yes ☐ No ☐ NA
2. Does water (bulk shipment) transporter retain copy of shipping paper for each shipment delivered by water? ☐ Yes ☐ No ☐ NA
3. Does initial rail transporter keep a copy of manifest and/or shipping paper? ☐ Yes ☐ No ☐ NA
4. Does transporter shipping waste outside of the U.S. keep for 3 years copy indicating that waste was shipped? ☐ Yes ☐ No ☐ NA

Part 6

Part NA

CONTAINERS CHECKLIST

Section A - Use and Management (264.171) (265.171)

1. Are containers in good condition? ☐ Yes ☐ No ☐ NA

Section B - Compatibility of Waste With Container (264.172)

1. Is container made of a material that will not react with the waste which it stores? ☐ Yes ☐ No ☐ NA

Section C - Management of Containers (264.173) (265.173)

1. Is container always closed while holding hazardous waste? ☐ Yes ☐ No ☐ NA
2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? ☐ Yes ☐ No ☐ NA

Section D - Inspections (264.174) (265.174)

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? ☐ Yes ☐ No ☐ NA

Section E - Containment (Part 264) (264.175)

1. Do container storage areas have a containment system? ☐ Yes ☐ No ☐ NA
- a. Is the base free of cracks or gaps? ☐ Yes ☐ No ☐ NA
- b. Is the base sloped or otherwise designed to drain and remove liquids? ☐ Yes ☐ No ☐ NA
- c. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container? ☐ Yes ☐ No ☐ NA
- d. Is any method available to prevent run-on into the containment system? ☐ Yes ☐ No ☐ NA
- e. Is spilled or leaked material or accumulated precipitation removed from the containment area in a timely manner? ☐ Yes ☐ No ☐ NA

Section F - Ignitable and Reactive Waste (264.176) (265.176)

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? ☐ Yes ☐ No ☐ NA

Section G - Incompatible Waste (264.177) (265.177)

1. Are incompatible wastes or materials placed in the same containers? ☐ Yes ☐ No ☐ NA
2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? ☐ Yes ☐ No ☐ NA
3. Are incompatible wastes separated from each other by a berm, dike, wall, or other device? ☐ Yes ☐ No ☐ NA

Section H - Closure (Part 264) (264.178)

1. At closure, were all hazardous wastes and associated residues removed from the containment system? ☐ Yes ☐ No ☐ NA

SURFACE IMPOUNDMENTS CHECKLISTSection A - Design Requirements (264.221) (265.221)

1. Does facility operate one or more surface impoundments? *closed* ☒ Yes ___ No ___ NA
- a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units? ___ Yes ___ No ___ NA
- b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents? ___ Yes ___ No ___ NA
- c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? ___ Yes ___ No ___ NA
- d. If impoundment does not have a double liner, is it exempt due to one of the following reasons? ___ Yes ___ No ___ NA
1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.
2. Monofill has at least one liner for which there is no evidence of leaking.
3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs.
- e. Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error (Part 264)? ___ Yes ___ No ___ NA
- f. Is impoundment surrounded by dikes (Part 264)? ___ Yes ___ No ___ NA

Section B - Operating Requirements

1. Does owner/operator maintain at least 60 cm (2 ft) of free-board (Part 265)? (265.222) ___ Yes ___ No ___ NA

(continued)

2. Does owner/operator have certification from a qualified engineer that alternate design features will prevent overtopping? (Part 265) (265.222) __Yes __No __NA

Section C - Containment Systems

1. Do all dikes have a protective cover such as grass, shale or rock? (Part 265) (265.223) __Yes __No __NA

Section D - Waste Analysis and Trial Tests

1. Will the surface impoundment be used to: (265.225)
- a. chemically treat a hazardous waste which is substantially different from wastes previously treated in the impoundment? (Part 265) __Yes __No __NA
 - b. chemically treat hazardous waste with a substantially different process than any previously used in that impoundment? __Yes __No __NA
2. If the answer in #1 was yes to any questions, has the owner/operator:
- a. conducted waste analysis or trial treatment tests? __Yes __No __NA
 - b. obtained written, documented information on treatment of similar wastes under similar operating conditions? __Yes __No __NA

Section E - Inspections and Monitoring

1. Does the owner/operator:
- a. inspect the freeboard at least once each operating day? (Part 265) (265.226) __Yes __No __NA
 - b. inspect the surface impoundment including dikes and vegetation at least once per week and after storms? (264.226) (265.226) __Yes __No __NA
2. Have any deteriorations or malfunctions that have been found been remediated? __Yes __No __NA
3. Has the owner/operator obtained a certification from a qualified engineer that the impoundments dike has structural integrity? (Part 264) (264.226) __Yes __No __NA

Section F - Emergency Repairs, Contingency Plans (part 264) (264.227)

1. Does facility have a contingency plan? ☐ Yes ☐ No ☐ NA
- a. If yes, does plan stipulate that impoundment be removed from service under the following conditions:
1. Sudden drop in liquid level? ☐ Yes ☐ No ☐ NA
2. Leaking dike? ☐ Yes ☐ No ☐ NA
- b. Does plan detail the steps to be followed when removing impoundment from service, including:
1. Shutting off flow into impoundment? ☐ Yes ☐ No ☐ NA
2. Containing any surface leakage? ☐ Yes ☐ No ☐ NA
3. Stopping the leak? ☐ Yes ☐ No ☐ NA
4. Notifying Regional Administrator of problems in writing if leaks cannot be contained? ☐ Yes ☐ No ☐ NA
- c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems before restoring impoundment to service? ☐ Yes ☐ No ☐ NA
- d. If impoundment was removed from service and was not re-stored to service, was impoundment closed in accordance with an approved closure plan? ☐ Yes ☐ No ☐ NA

Section G - Closure and Post-Closure (264.228) (265.228)

1. Is a closure plan retained at the facility? ☒ Yes ☐ No ☐ NA
2. At closure, did owner/operator:
- a. Remove standing liquids (Part 265)? ☒ Yes ☐ No ☐ NA
- b. Remove waste and waste residue (Part 265)? ☐ Yes ☒ No ☐ NA
- c. Remove liner (Part 265)? ☐ Yes ☐ No ☒ NA
- d. Remove underlying and surrounding contaminated soil? ☐ Yes ☒ No ☐ NA

(continued)

- e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were nonhazardous (Part 265)? ☐ Yes ☐ No ☐ NA
1. If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)? ☐ Yes ☐ No ☐ NA
3. If regulated under Part 264, has owner/operator: (264.228)
- a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste? ☒ Yes ☐ No ☐ NA
- b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues? ☒ Yes ☐ No ☐ NA
- c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover? ☐ Yes ☐ No ☐ NA
- d. Covered the impoundment with final cover? ☒ Yes ☐ No ☐ NA
4. Did owner/operator leave any residuals in place at closure (Part 264)? (264.228) ☐ Yes ☐ No ☐ NA
5. In post-closure, does owner/operator maintain integrity of cover and ground-water monitoring system, and prevent run-on and runoff? (264.228) (265.228) ☐ Yes ☐ No ☐ NA

Section H - Ignitable and Reactive Wastes (264.229) (265.229)

1. Are ignitable or reactive wastes placed in the impoundment? ☐ Yes ☐ No ☐ NA
- a. If no, do not complete b and c.
- b. If yes, are they treated, rendered, or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive? ☐ Yes ☐ No ☐ NA
- OR
- c. Is the impoundment used solely for emergencies? ☐ Yes ☐ No ☐ NA

Section I - Incompatible Wastes (264.230) (265.230)

1. Are incompatible wastes placed in the impoundment? ☐ Yes ☐ No ☐ NA

WASTE PILES CHECKLISTSection A - Design and Operating Requirements (264.251) (265.251)

1. Is the pile containing hazardous waste protected from wind? ☐ Yes ☐ No ☐ NA
2. Does waste pile have a liner and leachate collection system (Part 264)? ☐ Yes ☐ No ☐ NA
 - a. If no, has facility proved to Regional Administrator that waste pile's design characteristics will prevent migration of hazardous constituents into ground water (Part 264)? ☐ Yes ☐ No ☐ NA
3. Is run-on diverted around active portion (Part 264)? ☐ Yes ☐ No ☐ NA
4. Is runoff collected and controlled (Part 264)? ☐ Yes ☐ No ☐ NA
5. Are collection and holding facilities emptied after storms? ☐ Yes ☐ No ☐ NA

Section B - Waste Analysis (Part 265) (265.252)

1. Is a representative sample of waste from each incoming shipment analyzed before the waste is added to the pile to determine the compatibility of the wastes? ☐ Yes ☐ No ☐ NA
2. Does the analysis include a visual comparison of color or texture? ☐ Yes ☐ No ☐ NA

Section C - Containment (Part 265) (265.253)

1. Is the leachate or runoff from the pile considered a hazardous waste? ☐ Yes ☐ No ☐ NA
 - a. If yes, is the pile managed with the following:
 1. An impermeable base compatible with the waste? ☐ Yes ☐ No ☐ NA
 2. Run-on diversion? ☐ Yes ☐ No ☐ NA
 3. Leachate and runoff collection? ☐ Yes ☐ No ☐ NA
 4. Are collection and holding facilities periodically emptied? ☐ Yes ☐ No ☐ NA
 - OR
 5. Is the pile protected from precipitation and run-on by some other means? ☐ Yes ☐ No ☐ NA

Section D - Monitoring and Inspection (Part 264) (264.254)

1. Are liners and covers inspected for damage during construction? __Yes __No __NA
2. Are waste piles inspected weekly for deterioration, run-on and runoff controls, wind dispersal control, and proper function of leachate collection system? __Yes __No __NA

Section E - Ignitable or Reactive Wastes (264.256) (265.256)

1. Are ignitable or reactive wastes placed in the pile? __Yes __No __NA
 - a. If yes, does the addition of the waste result in the waste or mixture no longer meeting the definition?
(Use narrative explanation sheet to describe procedure.) __Yes __No __NA
- OR
- b. Is the waste protected from sources of ignition or reaction? __Yes __No __NA
 1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
 2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

Section F - Incompatible Wastes (264.257) (265.257)

1. Are incompatible wastes placed together in the pile? __Yes __No __NA
2. Are incompatible wastes separated from each other by a dike, berm, or wall? __Yes __No __NA
3. Is there evidence of fire, explosion, gaseous emissions, leaching, or other discharge? (Use narrative explanation sheet.) __Yes __No __NA

Section G - Closure and Post-Closure (264.258) (265.258)

1. Is a closure plan retained at the facility? __Yes __No __NA

(continued)

1. At closure, were all waste residues, contaminated system components, contaminated subsoils, and contaminated structures and equipment removed or decontaminated? ___Yes ___No ___NA
2. Were all contaminated subsoils removed from the site? ___Yes ___No ___NA
 - a. If no, did owner/operator close the facility and perform closure and post-closure care in accordance with §264.310 and 265.310? ___Yes ___No ___NA
3. Is a plan for complying with No. 2 above included in closure plan? ___Yes ___No ___NA
4. Is a contingency plan for complying with No. 3a above included in the plan? ___Yes ___No ___NA
5. Is a contingent post-closure plan included? ___Yes ___No ___NA
7. Are cost estimates included in closure plan? ___Yes ___No ___NA

Section H - Requirements for Wastes F020, F021, F022, F023, F026, and F027 (264.259)

1. Does facility place these F wastes in a waste pile? ___Yes ___No ___NA
 - a. If yes, does facility have an approved management plan for these wastes? ___Yes ___No ___NA

LAND TREATMENT CHECKLISTSection A - Treatment Program (Part 264) (264.271)

1. Does facility follow an approved land treatment program? ☐ Yes ☐ No ☐ NA

Section B - Treatment Demonstration (Part 264) (264.272)

1. Has owner/operator demonstrated to Regional Administrator that hazardous wastes used in the program are completely degraded, transformed, or immobilized? ☐ Yes ☐ No ☐ NA

Section C - Operating Requirements (264.273) (265.272)

1. Is run-on diverted away from the land treatment facility? ☐ Yes ☐ No ☐ NA
2. Is runoff from the land treatment facility collected? ☐ Yes ☐ No ☐ NA
3. Are holding facilities emptied after storms? ☐ Yes ☐ No ☐ NA
4. Is the runoff analyzed to see if it is a hazardous waste? ☐ Yes ☐ No ☐ NA
5. Is facility managed to control dispersal? ☐ Yes ☐ No ☐ NA
6. Is unit inspected weekly (Part 264)? ☐ Yes ☐ No ☐ NA

Section D - Waste Analysis (Part 265) (265.273)

1. If the runoff is considered hazardous, how is it handled?
(Use narrative explanation sheet.)
2. If it is not a hazardous waste, is it discharged through a point source to surface waters? ☐ Yes ☐ No ☐ NA
- a. If yes, list NPDES Permit No. _____
3. What hazardous wastes are treated at the land treatment facility?

Subpart D Listed WastesCharacteristic Wastes (EP Toxicity)

- a. For those listed wastes, were analyses done to determine the concentrations of those constituents which caused the waste to be listed? ___Yes ___No ___NA

1. If yes, what are these concentrations? (Use narrative explanation sheet.)

- b. For those characteristic wastes (EP) toxicity, what are the concentrations of the following:

<u>Concentration, mg/liter</u>	<u>Waste</u>
Arsenic	
Barium	
Cadmium	
Chromium	
Lead	
Mercury	
Selenium	
Silver	
Endrin	
Lindane	
Methoxychlor	
Toxphene	
2,4-D	
2,4,5-TP silvex	

Section E - Food-Chain Crops (264.276) (265.276)

1. Are food-chain crops grown? ___Yes ___No ___NA

- a. If yes, what are the concentrations of the following in the soil and vegetation:

<u>Soil concentration,</u> <u>mg/liter</u>	<u>Vegetation concentration,</u> <u>mg/liter</u>
Arsenic	
Cadmium	
Lead	
Mercury	

2. Did the facility notify Regional Administrator that he is growing food-chain crops (Part 265)? ___Yes ___No ___NA

(continued)

3. Has owner/operator demonstrated that no harm is done to health or environment (Part 264)? __Yes __No __NA
4. Has owner/operator demonstrated that any arsenic, lead, mercury, or other constituents under 265.273(b) will not be transported to crops (Part 265)? __Yes __No __NA
5. Does the facility treat waste that contains cadmium? __Yes __No __NA
 - a. If no, do not fill out b.
 - b. If yes, was the pH of the soil and waste mixture 6.5 or greater at the time of each waste application? __Yes __No __NA
 1. If the pH was less than 6.5, did the waste contain cadmium concentrations of 2 mg/kg or less? __Yes __No __NA

Section F - Unsaturated-Zone Monitoring (264.278) (265.278)

1. Is an unsaturated-zone monitoring plan kept at the facility (Part 265)? __Yes __No __NA
2. Does owner/operator perform the following:
 - a. Soil monitoring? __Yes __No __NA
 - b. Soil-pore water monitoring? __Yes __No __NA
 - c. Sample depths below waste incorporation? __Yes __No __NA
 - d. Background values (Part 264)? __Yes __No __NA
 - e. Consistent sampling and analysis procedures? __Yes __No __NA
 - f. Determination of significant changes? __Yes __No __NA
 - g. Notification when change is found? __Yes __No __NA
3. Does plan include the following (Part 265):
 - a. Depth of sampling? __Yes __No __NA
 - b. Number of samples? __Yes __No __NA
 - c. Frequency and timing of samples? __Yes __No __NA
4. Does owner/operator analyze for hazardous waste constituents? __Yes __No __NA

(continued)

Section G - Recordkeeping (264.279) (265.279)

1. Are records kept at the facility of:

- a. Application dates?
- b. Application rates?
- c. Quantities?
- d. Waste location?

☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA

Section H - Closure and Post-Closure (264.280) (265.280)

1. Is a copy of the closure/post-closure plan kept at the facility?

☐ Yes ☐ No ☐ NA

2. Does closure plan address the following (Part 265):

- a. Control of the migration of hazardous waste and hazardous waste constituents from the treated area into the ground water?
- b. Control of the release of contaminated runoff from the facility into surface water?
- c. Control of the release of airborne particulate contaminants caused by wind erosion?
- d. Compliance with §265.276 concerning the growth of food-chain crops?

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

3. Does owner/operator ensure the following during closure (Part 264):

- a. Maintenance of monitoring systems on unsaturated zone?
- b. Maintenance of run-on controls?
- c. Maintenance of runoff management system?
- d. Wind dispersal control?
- e. Attempt to maximize degradation, transformation, and immobilization of hazardous waste constituents?
- f. Continue to comply with any prohibitions or conditions concerning growth of food-chain crops?

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

(continued)

- g. Continue unsaturated-zone monitoring in compliance with 264.278? ☐ Yes ☐ No ☐ NA
- h. Establish a vegetative cover on the portion of the facility being closed at such time that the cover will not substantially impede degradation, transformation, or immobilization of hazardous constituents in the treatment zone? ☐ Yes ☐ No ☐ NA
4. During post-closure care, does owner/operator:
- a. Continue all operations (including pH control) necessary to enhance degradation and transformation and sustain immobilization of hazardous constituents in the treatment zone? ☐ Yes ☐ No ☐ NA
- b. Maintain a vegetative cover over closed portions of the facility? ☐ Yes ☐ No ☐ NA
- c. Maintain the run-on control system required under §264.273(c)? ☐ Yes ☐ No ☐ NA
- d. Maintain the runoff management system required under §264.273(d)? ☐ Yes ☐ No ☐ NA
- e. Control wind dispersal of hazardous waste if required under §264.273(f)? ☐ Yes ☐ No ☐ NA
- f. Continue to comply with any prohibitions or conditions concerning growth of food-chain crops under §264.276? ☐ Yes ☐ No ☐ NA
- g. Continue unsaturated-zone monitoring in compliance with §264.278? ☐ Yes ☐ No ☐ NA
5. Does facility have certification that closure was performed according to plan? ☐ Yes ☐ No ☐ NA
- a. Was certification submitted to Regional Administrator (Part 265)? ☐ Yes ☐ No ☐ NA
6. Does owner/operator continue the following during post-closure (Part 265)?
- a. Soil-pore monitoring by collecting and analyzing samples as specified in the plan? ☐ Yes ☐ No ☐ NA

(continued)

- b. Restrict access? __Yes __No __NA
- c. Assure that growth of food-chain crops is in compliance? __Yes __No __NA
- d. Control wind dispersal? __Yes __No __NA

Section I - Ignitable or Reactive Wastes (264.281) (265.281)

1. Are ignitable or reactive wastes placed in the facility? __Yes __No __NA
- a. If yes, are the wastes treated, rendered, or mixed before or after placement in the landfill so it is no longer reactive or ignitable? __Yes __No __NA
- b. Describe or attach a copy of treatment.

Section J - Incompatible Wastes (264.282) (265.282)

1. Are incompatible wastes placed in the facility? __Yes __No __NA
- a. Are the incompatible wastes placed in different locations in the facility? __Yes __No __NA

Section K - Requirements for Wastes F020, F021, F022, F023, F026, F027
(264.283)

1. Does facility place these F wastes in a land treatment unit? __Yes __No __NA
- a. If yes, does the facility have an approved management plan for these wastes? __Yes __No __NA

LANDFILLS CHECKLISTSection A - Design Requirements (264.301) (265.301)

1. Does landfill have two or more liners and a leachate collection system between the liners? ☐ Yes ☒ No ☐ NA
2. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? ☐ Yes ☒ No ☐ NA
3. If landfill does not have two liners and a leachate collection system, did owner/operator adequately demonstrate to Regional Administrator that alternate design and operation prevents migration of hazardous constituents? ☐ Yes ☒ No ☐ NA
4. If no double liner exists, does landfill fall into one of the following exemption categories:
- a. Monofill only holds wastes from foundry furnace emission controls or metal casting molding sand? ☐ Yes ☒ No ☐ NA
- b. Monofill has at least one liner and there is no evidence that liner is leaking? ☐ Yes ☒ No ☐ NA
- c. Owner/operator demonstrates that monofill is located, designed, and operated to prevent migration of hazardous constituents? ☐ Yes ☒ No ☐ NA
5. If landfill does not have two liners and a leachate collection system, does it have at least one liner for all existing portions (Part 264)? ☐ Yes ☒ No ☐ NA
- a. If yes, does this liner provide for the following:
1. To prevent migration of wastes out of landfill to subsurface soil, ground water, and surface water (Part 264)? ☐ Yes ☒ No ☐ NA
2. A leachate collection and removal system immediately above the liner constructed to be chemically resistant to the waste and strong enough not to collapse under pressure (Part 264)? ☐ Yes ☒ No ☐ NA
6. If owner/operator does not comply with No. 5 above, is he exempt after demonstrating to Regional Administrator that alternate design and operation prevents migration of hazardous constituents (Part 264)? ☐ Yes ☒ No ☐ NA

(continued)
OSWER Dir. No. 9938.2A

March 1988

Section B - Operating Requirements (264.301) (265.301)

1. Are run-on controls preventing flow onto the active portion of the landfill? ☐ Yes ☐ No ☐ NA
2. Is runoff collected and controlled? ☐ Yes ☐ No ☐ NA
3. Are collection and holding facilities emptied after storms? ☐ Yes ☐ No ☐ NA
4. Is the landfill managed so that wind dispersal is controlled? ☐ Yes ☐ No ☐ NA

Section C - Monitoring and Inspection (Part 264) (264.303)

1. Are liners inspected for defects during and after construction? ☐ Yes ☐ No ☐ NA
2. Are landfills inspected weekly and after storms for defects? ☐ Yes ☐ No ☐ NA

Section D - Surveying and Recordkeeping (264.309) (265.309)

1. Does owner/operator retain records at the facility? ☐ Yes ☐ No ☐ NA
 - a. If yes, are the following maintained:
 1. On map, exact location and dimensions, including depths, of each cell? ☐ Yes ☐ No ☐ NA
 2. Contents of each cell and approximate location of each hazardous waste type within the cell? ☐ Yes ☐ No ☐ NA

Section E - Closure and Post-Closure (264.310) (265.310)

1. Is a closure plan kept on site? ☒ Yes ☐ No ☐ NA
 - a. If yes, does cover provide for the following:
 1. Minimizing migration of liquids? ☒ Yes ☐ No ☐ NA
 2. Minimum maintenance? ☒ Yes ☐ No ☐ NA
 3. Promote drainage; minimize erosion? ☒ Yes ☐ No ☐ NA
 4. Accommodate settling and subsidence? ☒ Yes ☐ No ☐ NA
 5. Less permeable than bottom liner or natural subsoils? ☒ Yes ☐ No ☐ NA
 - b. After final closure, does owner/operator provide for the following:

(continued)

OSWER Dir. No. 9938.2A

March 1988

- | | | | | |
|----|---|------------------------------|-----------------------------|-----------------------------|
| 1. | Maintain final cover? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 2. | Continue to operate leachate collection and removal system until leachate is no longer collected? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 3. | Maintain ground-water monitoring? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 4. | Prevent run-on and runoff from eroding and damaging cover? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 5. | Protect and maintain surveyed bench marks? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |

Section F - Ignitable and Reactive Waste (264.312) (265.312)

- | | | | | |
|----|---|------------------------------|-----------------------------|-----------------------------|
| 1. | Are ignitable or reactive wastes placed in the landfill? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| a. | If yes, is waste treated, rendered, or mixed before or immediately after placement so that it is no longer ignitable or reactive? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 2. | Are ignitable wastes in containers placed in landfill? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| a. | If yes, attach a narrative describing how these wastes are handled to prevent ignition or reaction? | | | |

Section G - Incompatible Wastes (264.313) (265.313)

- | | | | | |
|----|--|------------------------------|-----------------------------|-----------------------------|
| 1. | Does owner/operator place incompatible wastes in landfill? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
|----|--|------------------------------|-----------------------------|-----------------------------|

Section H - Bulk and Containerized Liquids (264.314) (265.314)

- | | | | | |
|----|--|------------------------------|-----------------------------|-----------------------------|
| 1. | Does landfill receive any bulk or containerized liquid hazardous waste? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| a. | If yes, have they been added to landfill since May 8, 1985? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 2. | Does landfill receive containers of free liquids? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| a. | If yes, is at least one of the following conditions met: | | | |
| 1. | Have free-standing liquids been removed by decanting or other methods; or have they been mixed with absorbent or solidified? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 2. | Are containers ampules? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 3. | Is container designed to hold free liquids? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 4. | Is container a lab pack? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |

(continued)

3. Have containers holding liquids that are not hazardous wastes been placed in the landfill since November 9, 1985? ☐ Yes ☐ No ☐ NA

a. If yes, is one of the following conditions met:

1. Was it the only reasonable alternative to place it in a landfill or unlined impoundment? ☐ Yes ☐ No ☐ NA
2. Did placement not present a risk to contaminating any underground source of drinking water? ☐ Yes ☐ No ☐ NA

Section I - Container Requirements (264.315) (265.315)

1. Are containers placed in the landfill? ☐ Yes ☐ No ☐ NA

a. If yes, are they either:

1. 90 percent full? ☐ Yes ☐ No ☐ NA
2. Crushed, shredded, or similarly reduced in volume? ☐ Yes ☐ No ☐ NA

Section J - Overpacked Drums (264.316) (265.316)

1. Are small containers of hazardous waste placed in landfill? ☐ Yes ☐ No ☐ NA

a. If yes, are the following requirements met?

1. Waste packaged in non-leaking container and tightly sealed? ☐ Yes ☐ No ☐ NA
- b. Containers not overpacked according to DOT regulations? ☐ Yes ☐ No ☐ NA
- c. Absorbent material does not react with waste? ☐ Yes ☐ No ☐ NA
- d. Incompatible wastes not placed outside the same container? ☐ Yes ☐ No ☐ NA
- e. Reactive waste treated or rendered nonactive before packaging? ☐ Yes ☐ No ☐ NA

Section K - F020, F021, F022, F023, F026, and F027 Wastes (Part 264 only)

(264.317)

1. Are these wastes placed in landfill? ☐ Yes ☐ No ☐ NA

a. If yes, did owner/operator receive permission from Regional Administrator to do so? ☐ Yes ☐ No ☐ NA

b. Is documentation of "a" above on file at facility? ☐ Yes ☐ No ☐ NA

INCINERATORS CHECKLISTSection A - Waste Analysis (Part 265 only) (265.341)

1. Does owner/operator analyze all wastes he has not previously burned to enable him to establish steady-state operating conditions? ☐ Yes ☐ No ☐ NA
- a. If yes, does analysis include:
1. Determination of heating value? ☐ Yes ☐ No ☐ NA
2. Determination of halogen and sulfur content? ☐ Yes ☐ No ☐ NA
3. Concentrations of lead and mercury? ☐ Yes ☐ No ☐ NA
- b. If lead and mercury are not included, has owner/operator proven this fact to Regional Administrator? ☐ Yes ☐ No ☐ NA
2. Does owner/operator perform a waste feed analysis in the Part B application? ☐ Yes ☐ No ☐ NA
3. Are waste analyses performed throughout normal operations? ☐ Yes ☐ No ☐ NA

Section B - Principal Organic Hazardous Constituents (POHC's) (Part 264)
(264.342)

1. Does owner/operator use POHC's in accordance with facility's permit specifications? ☐ Yes ☐ No ☐ NA

Section C - Performance Standards (Part 264) (264.343)

1. Does incinerator burn at a destruction and removal efficiency (DRE) of at least 99.9999 percent for each POHC? ☐ Yes ☐ No ☐ NA
2. Do stack emissions of more than 1.8 kg/h of HCl exceed both 1.8 kg/h and 1 percent HCl in the stack? ☐ Yes ☐ No ☐ NA
3. Does incinerator emit particulates greater than 180 mg/dry standard cubic meter? ☐ Yes ☐ No ☐ NA

Section D - Permits (264.344)

1. Are wastes burned although no permit is issued (Part 264)? ☐ Yes ☐ No ☐ NA
- (continued)

- a. If yes, are wastes burned in a trial burn (Part 264)? ☐ Yes ☐ No ☐ NA
OR
- b. Does owner/operator have an exemption due to 264.340 (Part 264) ☐ Yes ☐ No ☐ NA
- c. Does owner/operator burn hazardous waste during startup or shutdown if not allowed to do so in permit (Part 264)? ☐ Yes ☐ No ☐ NA
- d. Is waste feed cut off when operating requirements are not met (Part 264)? ☐ Yes ☐ No ☐ NA

Section E - Operating Requirements (264.345) (265.345)

1. Does incinerator operate per permit requirements (Part 264)? ☐ Yes ☐ No ☐ NA
2. Does owner/operator feed hazardous waste into incinerator when it is not at steady state (Part 265)? ☐ Yes ☐ No ☐ NA

Section F - Monitoring and Inspections (264.347) (265.347)

1. Does owner/operator conduct, at a minimum, the following:
- a. Existing instruments relating to combustion or emission control every 15 minutes (Part 265)? ☐ Yes ☐ No ☐ NA
- b. Is complete incinerator and associated equipment inspected daily for leaks, spills, and emissions, and are all emergency shutdown controls and system alarms checked (Part 265)? ☐ Yes ☐ No ☐ NA
- c. Are combustion temperature, waste feed rate, and combustion gas velocity all checked continuously (Part 264)? ☐ Yes ☐ No ☐ NA
- d. Is CO monitored continuously (Part 264)? ☐ Yes ☐ No ☐ NA
- e. Are waste and exhaust emissions sampled and analyzed (Part 264)? ☐ Yes ☐ No ☐ NA
- f. Is incinerator usually checked daily for leaks and spills (Part 264)? ☐ Yes ☐ No ☐ NA

(continued)

- g. Are emergency feed cutoff and alarms inspected weekly (Part 264)? ☐ Yes ☐ No ☐ NA
- h. Are monitoring and inspection data recorded and placed in operating log (Part 264)? ☐ Yes ☐ No ☐ NA

Section G - Closure (264.351) (265.351)

1. Is a closure plan kept on site? ☐ Yes ☐ No ☐ NA
2. At closure, has owner/operator removed all hazardous waste residues from incinerator? ☐ Yes ☐ No ☐ NA

Section H - Interim Status (Part 265) (265.352)

1. Does owner/operator burn F020, F021, F022, F023, F026, and/or F027 wastes? ☐ Yes ☐ No ☐ NA
- a. If yes, does owner/operator possess certification from Assistant Administrator for Solid Waste and Emergency Response to do so? ☐ Yes ☐ No ☐ NA

THERMAL TREATMENT CHECKLIST
(Part 265 only)

NOTE: Applies to thermal treatment of hazardous waste in devices other than incinerators.

Section A - Operating Requirements (265.373)

1. Is the process a noncontinuous (batch) process? ___Yes ___No ___NA
- a. If no, is the process operating at steady-state conditions (including temperature) before adding hazardous waste? ___Yes ___No ___NA
- b. Is a waste analysis documented in the operating record that includes:
- | | |
|------------------------------|--------------------|
| 1. Heating value? | ___Yes ___No ___NA |
| 2. Halogen content? | ___Yes ___No ___NA |
| 3. Sulfur content? | ___Yes ___No ___NA |
| 4. Concentration of lead? | ___Yes ___No ___NA |
| 5. Concentration of mercury? | ___Yes ___No ___NA |

NOTE: 4 and 5 not required if facility has written documented data that show the elements are not present.

2. Does the owner/operator monitor the following when thermally treating hazardous wastes:
- a. At least every 15 minutes, existing instruments which relate to the temperature and emission control:
- | | |
|-----------------------------------|--------------------|
| 1. Waste feed? | ___Yes ___No ___NA |
| 2. Auxiliary fuel feed? | ___Yes ___No ___NA |
| 3. Treatment process temperature? | ___Yes ___No ___NA |
| 4. Relevant process flow? | ___Yes ___No ___NA |
| 5. Relevant level controls? | ___Yes ___No ___NA |
- b. Stack plume (emissions) at least hourly:
- | | |
|--------------------|--------------------|
| 1. Color (normal)? | ___Yes ___No ___NA |
| 2. Opacity? | ___Yes ___No ___NA |

(continued)

- c. Thermal treatment process equipment at least daily:
1. Pumps, valves, conveyors, pipes, etc., for leaks, spills, and fugitive emissions? ☐ Yes ☐ No ☐ NA
 2. Emergency shutdown controls? ☐ Yes ☐ No ☐ NA
 3. System alarms ☐ Yes ☐ No ☐ NA
- d. Construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams? ☐ Yes ☐ No ☐ NA
- e. Construction materials of the area immediately surrounding discharge confinement structures at least weekly? ☐ Yes ☐ No ☐ NA

Section B - Closure (265.381)

1. Is a closure plan maintained at the facility? ☐ Yes ☐ No ☐ NA

Section C - Open Burning (265.382)

1. Is there evidence of any open burning of hazardous waste? ☐ Yes ☐ No ☐ NA
(Use narrative explanation sheet.)
2. Is open burning or detonation of waste explosives conducted? ☐ Yes ☐ No ☐ NA
- a. If yes, is the detonation performed in accordance with the following table?

<u>Pounds of waste explosives or propellants</u>	<u>Minimum distance from open burning detonation to the property or others</u>
0-100	204 m (670 ft)
101-1,000	380 m (1250 ft)
1,001-10,000	530 m (1730 ft)
10,001-30,000	690 m (2260 ft)

Section D - Particulate Hazardous Waste (265.382)

1. Does owner/operator burn F020, F021, F022, F023, F026, and/or F027 wastes? ☐ Yes ☐ No ☐ NA
- a. If yes, does owner/operator have documented permission from Assistant Administrator for Solid Waste and Emergency Response to do so? ☐ Yes ☐ No ☐ NA

Section E - Closure (265.404)

Does the facility maintain a closure plan?

☐ Yes ☐ No ☐ NA

Section F - Ignitable or Reactive Waste (265.405)

1. Are ignitable or reactive wastes placed in the treatment process?

☐ Yes ☐ No ☐ NA

a. If yes, is the waste treated, rendered, or mixed before or immediately after being placed in the treatment process so it no longer meets the definition of ignitable or reactive?

☐ Yes ☐ No ☐ NA

Describe or attach a copy of the treatment.

Section G - Incompatible Wastes (265.406)

1. Are incompatible wastes placed in the same treatment process or equipment?

☐ Yes ☐ No ☐ NA

2. Are hazardous wastes placed in washed equipment if equipment previously held incompatible waste?

☐ Yes ☐ No ☐ NA

GROUND-WATER MONITORING CHECKLISTSection A - Monitoring System

1. Does the facility have a ground-water monitoring system in operation? ☒ Yes ☐ No ☐ NA
 - a. If yes, does the system consist of: (265.91)(264.99)(264.98)
 1. One upgradient monitoring well (Part 265)? ☒ Yes ☐ No ☐ NA
 2. Three downgradient monitoring wells (Part 265)? ☒ Yes ☐ No ☐ NA
 - b. Are monitoring wells cased so that the integrity of the boreholes is maintained (Part 265)? ☒ Yes ☐ No ☐ NA
 - c. Is a compliance monitoring system installed whenever hazardous waste constituents are detected at the compliance point (Part 264)? ☐ Yes ☐ No ☐ NA
 - d. Is a corrective-action program initiated whenever the ground-water protection standard is exceeded (Part 264)? ☐ Yes ☐ No ☐ NA
 - e. Is a detection monitoring program instituted in all other cases (Part 264)? ☒ Yes ☐ No ☐ NA
2. Does facility have a monitoring and response program (Part 264)? (264.91) ☒ Yes ☐ No ☐ NA
 - a. If yes, is a compliance monitoring system instituted whenever hazardous constituents are detected at the compliance point (Part 264)? ☒ Yes ☐ No ☐ NA
 - b. Whenever the ground-water protection standard is exceeded, does facility institute a corrective-action program (Part 264)? ☐ Yes ☐ No ☒ NA
 - c. In all other cases, does facility institute a detection monitoring program (Part 264)? ☒ Yes ☐ No ☐ NA

Section B - Sampling and Analysis (Part 265 only) (265.92)

1. Does the facility obtain and analyze samples from the ground-water monitoring system? ☒ Yes ☐ No ☐ NA

(continued)

2. Has facility developed and followed a ground-water sampling and analysis plan? ☒ Yes ☐ No ☐ NA
- a. If yes, does this plan include procedures and techniques for:
1. Sample collection? ☒ Yes ☐ No ☐ NA
 2. Sample preservation? ☒ Yes ☐ No ☐ NA
 3. Analytical procedures? ☒ Yes ☐ No ☐ NA
 4. Chain-of-custody control? ☒ Yes ☐ No ☐ NA
- b. Does the facility determine the concentration or value of the following parameters in ground-water samples?
1. Parameters characterizing the suitability of the ground water as a drinking water supply, as specified in §265, Appendix 3? ☐ Yes ☒ No ☐ NA
 2. Parameters establishing ground-water quality (chloride, iron, manganese, phenols, sodium, sulfate)? ☐ Yes ☐ No ☐ NA
 3. Parameters used as indicators of ground-water contamination (pH, specific conductance, total organic carbon, total organic halogen)? ☐ Yes ☐ No ☐ NA
- c. Has the owner/operator established initial background concentrations or values of all parameters specified above at least on a quarterly basis? ☒ Yes ☐ No ☐ NA
- d. Has owner/operator obtained at least four replicate measurements for each sample, and has he determined the initial background arithmetic mean and variance? ☒ Yes ☐ No ☐ NA
- e. After the first year, does owner/operator sample and analyze with the following frequencies:
1. Samples collected to establish background quality (from above)? ☐ Yes ☐ No ☐ NA
 2. Samples collected to indicate contamination (from above)? ☐ Yes ☐ No ☐ NA
 3. Elevation of ground-water surface at each monitoring well at each sampling event? ☐ Yes ☐ No ☐ NA

Section C - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a ground-water quality assessment program? ☒ Yes ☐ No ☐ NA

(continued)

- writing results*
- a. If yes, did program determine the following:
 1. Whether hazardous waste or hazardous waste constituents have entered the ground water? __Yes __No __NA
 2. Rate and extent of hazardous waste or hazardous waste constituent migration? __Yes __No __NA
 3. Concentrations of hazardous waste or hazardous waste constituents in ground water? __Yes __No __NA
 - b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? __Yes __No __NA
 - c. Has owner/operator submitted information documenting any significant increase in comparisons for upgradient wells (or decrease in pH)? __Yes __No __NA
 - d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional ground-water samples from those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error? __Yes __No __NA
 1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days? __Yes __No __NA
 2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Regional Administrator within 14 days after notification (discussed above) a certified ground-water quality assessment program? __Yes __No __NA
 - e. If yes, does plan include the following:
 1. Number, location, and depth of wells? __Yes __No __NA
 2. Sampling and analytical methods for those hazardous wastes and hazardous waste constituents at the facility? __Yes __No __NA
 3. Evaluation procedures, including any use of previously gathered ground-water quality information? __Yes __No __NA
 4. Schedule of implementation? __Yes __No __NA

(continued)
OSWER Dir. No. 9938.2A

March 1988

3. Did owner/operator implement the ground-water quality assessment program and, at a minimum, did he determine the following: __Yes __No __NA
- a. Rate and extent of migration of the hazardous waste constituents in the ground water? __Yes __No __NA
- b. Concentrations of the hazardous waste in the ground water? __Yes __No __NA
4. Did owner/operator submit a report to Regional Administrator containing the requests of the assessment outlined in No. 3 above within 15 days? __Yes __No __NA
5. Did owner/operator notify Regional Administrator of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the ground water? __Yes __No __NA
6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the ground water, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or ground-water quality-assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if ground-water quality-assessment plan was implemented during post-closure? __Yes __No __NA
7. If any ground-water quality-assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to Regional Administrator, as outlined in No. 4 above? __Yes __No __NA
8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on ground-water elevation obtained under No. 2a in Section B above to determine whether the requirements for locating monitoring wells are satisfied? __Yes __No __NA
- a. If evaluation shows that the requirements for monitoring wells are not satisfied, has owner/operator modified the number, location, or depth of the monitoring wells to bring the system into compliance? __Yes __No __NA

(continued)

OSWER Dir. No. 9938-2A

March 1988

Section D - Recordkeeping and Reporting (Part 265 only) (265.94)

1. Unless owner/operator is monitoring to satisfy the requirements of §265.93(d)(4), does owner/operator:
- a. Keep records of the analyses required in §265.92(c) and (d), ground-water surface elevations required in 265.93(b) throughout the active life of the facility and throughout post-closure? *Barry* ☐ Yes ☐ No ☒ NA
 - b. Report the following information to the Regional Administrator:
 - 1. Within 15 days of analysis for each quarterly sampling event, does owner/operator submit results of background concentrations? ☐ Yes ☐ No ☒ NA
 - 2. Does owner/operator inform Regional Administrator about any parameters that exceed maximum contaminant levels listed in Appendix III? ☐ Yes ☐ No ☒ NA
 - 3. (Annually) does owner/operator report concentrations or values of parameters listed in §265.92(b)(3) for each well, including required evaluations for these parameters under §265.93(b)? ☐ Yes ☐ No ☒ NA
 - a. Does owner/operator also identify differences from initial background concentrations found in the upgradient wells no later than March 1 following each calendar year? ☐ Yes ☐ No ☒ NA
2. Does owner/operator submit results of the ground-water surface elevations under §265.93(f), along with a description of the response, if needed? ☐ Yes ☐ No ☒ NA
3. If ground water is monitored to satisfy requirements of §265.93(d)(4), did owner/operator do the following:
- a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure? ☐ Yes ☐ No ☒ NA
 - b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the ground-water quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1? ☐ Yes ☐ No ☒ NA

(continued)

Section E - General Requirements (Part 264 only) (264.97)

1. Does facility comply with the following requirements?
- a. Are sufficient wells installed at appropriate locations and depths? *no, just submit a site-wide assessment plan* ☐ Yes ☒ No ☐ NA
 - b. Have sampling and analysis techniques been consistent? ☐ Yes ☒ No ☐ NA
 - c. Have ground-water elevation data been recorded? ☐ Yes ☒ No ☐ NA
 - d. Have background concentrations been determined? ☐ Yes ☒ No ☐ NA
2. If ground water is monitored to satisfy requirements of §265.93(d)(4), owner/operator must:
- a. Keep records of the analyses and evaluations specified in the plan throughout the facility's active life, and, for disposal facilities, throughout post-closure. ☐ Yes ☒ No ☐ NA
 - b. Report the following ground-water monitoring information:
 - 1. During the first year when initial background concentrations are being determined, did owner/operator submit values within 15 days after completing analysis? ☐ Yes ☒ No ☐ NA
 - 2. If yes, did owner/operator also submit an identification of any parameters whose concentrations exceed maximum levels in Appendix III? ☐ Yes ☒ No ☐ NA
 - 3. (Annually) did owner/operator report concentrations or values of the parameters listed in §265.92(b)(2) for each well, along with required evaluations for these parameters under §265.93(b)? ☐ Yes ☒ No ☐ NA
 - 4. Did owner/operator also separately identify any significant differences from initial background concentrations for upgradient wells? ☐ Yes ☒ No ☐ NA
 - 5. Did owner/operator report on the results of ground-water surface elevations (and a description of the results if necessary) by March 1 of the following year? ☐ Yes ☒ No ☐ NA

Section F - Detection Monitoring Program (Part 264 only) (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases? ☒ Yes ☐ No ☐ NA

(continued)

a. If yes, are the following components included in the system:

- | | |
|--|---|
| 1. Background values? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| 2. Determination of ground-water flow rate? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| 3. Determination of ground-water compliance point semiannually? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| 4. Determination of statistically significant increases over background concentrations? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| 5. Notification to Regional Administrator if there was a statistically significant increase? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |

Section G - Compliance Monitoring Program (Part 264 only) (264.99)

- | | |
|--|---|
| 1. Does facility operate a compliance monitoring program? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| a. Does facility determine concentrations of hazardous constituents at least quarterly? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| b. Does facility determine ground-water flow rate and direction in uppermost aquifer annually? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| c. Does facility analyze samples for Appendix VIII constituents annually? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| d. Does facility make statistically significant increases over background values? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
| e. If there is an increase, does facility notify Regional Administrator and submit to establish a corrective-action program? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |

Section H - Corrective-Action Program (Part 264 only) (264.100)

- | | |
|--|---|
| 1. Does facility follow a corrective-action program that meets the facility's permit requirements? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |
|--|---|



DIVISION OF SOLID WASTE

REVIEWED BY DKPDATE 12/16/91COMMENTS Copy to EPA

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001
FAX: (412) 227-2423

via FEDERAL EXPRESS



December 13, 1991

David Peacock
Hazardous Waste Division
Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

Re: Koppers Industries, Inc. Grenada Plant, Industrial Boiler,
MSD 007 027 543

Dear Dave:

I am glad that we were able to meet on November 19, 1991 and thank you for sending me the copy of the Mississippi laws and regulations. At our meeting, a question arose as to whether or not the Koppers boiler would be considered a "commercial" hazardous waste facility. I am now writing to address that issue and to seek the state's determination that the facility is not "commercial" as Koppers proposes to operate it.

History

The Grenada wood preserving plant was constructed in 1904. Koppers Company, Inc. acquired the plant in 1944. Kopper Industries, Inc. purchased the plant in Dec. 1988. The plant consists of approximately 171 acres.

Industrial operations include wood preserving, a pole peeler, dry kiln operation, rail road tie sorting and milling, and trucking. Energy needs for these operations are provided by a wood fired steam boiler and a cogeneration turbine generator system. Plant employment is approximately 70 people. The Wellons wood fired boiler was constructed in 1979 to replace the oil fired boiler and provide a more economical source of energy. Wood waste from the peeler and tie mills and from other local lumber mills is used to fuel the boiler.

In 1982, based on stack test results showing 99.99% destruction and removal efficiency in wood preserving constituents burned, the air permit was modified to allow cofiring of fuel additive with the wood waste fuel. Since 1982, Koppers has used wood preserving process wastes from other Koppers owned facilities as a fuel additive in this boiler. The fuel additive program at the Grenada boiler has been valuable to Koppers by providing an alternative to land disposal of our process wastes while reducing the Grenada plant's need to purchase supplementary fuel. These process wastes were not RCRA hazardous wastes.

David Peacock, Miss. DEQ re Koppers Ind. Inc. December 13, 1991

RCRA Listings

On June 6, 1991, new RCRA hazardous waste listings became effective which defined wood preserving wastes from plants utilizing pentachlorophenol as F032 hazardous waste. This listing was made under HSWA authority which made the listing effective immediately in RCRA both authorized and unauthorized states. Additionally, wastes from wood preserving operations using creosote were listed as F034 hazardous waste and wastes from arsenical and chromium preservative operations were listed as F035 hazardous waste. These were not HSWA regulations, though, so will become effective in Mississippi when implementing regulations are passed.

These new listings mean that to continue burning Koppers generated process wastes, the boiler must be permitted as a hazardous waste facility.

Proposed Operation

It is Koppers intention to proceed with permitting the Grenada boiler in accordance with the new Boiler and Industrial Furnace (BIF) regulations, 40 CFR 266. The first steps of this process have already been completed, including submission of a revised Part A Application, submission of a Precompliance Certification, and public notice.

Koppers proposes to continue operation of the boiler and fuel additive program as in the past, with modifications as necessary to comply with the BIF operating requirements. The process wastes which we will use for fuel additive are wood preserving wastes from Koppers operated plants using pentachlorophenol and/or creosote and process wastes from Koppers operated coal tar plants. The coal tar plants manufacture creosote and other coal tar derivative products. Thus, these wastes consist of the same constituents and have similar fuel values as the creosote wood preserving wastes. The only fuel additive wastes to be accepted will be process wastes generated at plants operated by Koppers Industries, Inc.

The Grenada plant boiler will not be operated "for profit." For the purpose of balancing expenses, handling and permitting costs incurred by Grenada plant will be transferred to the other Koppers generator locations. These will only be internal accounting transfers and will not be true income for Koppers. Wastes from other companies will not be accepted.

David Peacock, Miss. DEQ re Koppers Ind. Inc. December 13, 1991

Non-Commercial

The Koppers Grenada boiler will not be operated as a commercial facility. No new business will accrue to Koppers do to the fuel additive program. Only internally generated wastes from Koppers operated locations will be used for fuel additive. The volume of waste handled will be much less than that normally associated with a commercial facility. In this case, a maximum of three truckloads of material per week will be brought into the plant. The "wastes" to be used are actually high BTU value fuel which will be beneficially used to produce needed steam and electricity for the Grenada plant. Wastes will not be accepted from any company or location external to Koppers. The fuel additive program will not be a "for profit" operation. The boiler will be a non-commercial facility.

Remaining Issues

Assuming that your agency determines that the boiler, operated as described above, is non-commercial, then Koppers will proceed with the remaining permitting and operational issues as follows:

Boiler cleanout procedures - Koppers recognizes your concerns about the cleanout procedures previously submitted. Procedures will be rewritten to incorporate your comments and we will work with you in developing a mutually acceptable cleanout procedure.

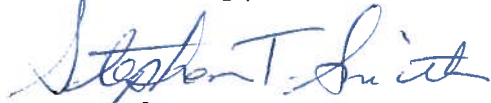
Facility Improvements - Based on the initial precompliance certification, we realized that the boiler stack is too low to provide a reasonable mixing zone. A higher stack will be installed according to good engineering practice. Other RCRA facility improvements will also be made, including fencing the fuel additive and ash handling areas, improve storm water runoff containment, and posting of warning signs. A stack gas emission monitoring system will be installed.

Compliance Certification - A test burn will be conducted to include the BIF and MS DEQ requirements. Following the test burn, the Compliance Certification will be prepared and submitted.

David Peacock, Miss. DEQ re Koppers Ind. Inc. December 13, 1991

Koppers views this project as important in allowing us to be a responsible corporate citizen by safely managing our own wastes our selves, to avoid long term liability and environmental damage by minimizing land disposal, and to assure Koppers long term economic health by having an alternative to the exorbitant costs of hazardous waste disposal and incineration. Additionally, Koppers will be beneficially using these residuals to recover there inherent fuel value. I look forward to your response to this letter and working with you more in the future. Please call at (412)227-2677 if you have questions, comments, or would like to discuss any of these issues. Koppers can also meet with you again either in Jackson or at the Grenada plant.

Sincerely,



Stephen T. Smith
Environmental Program Manager

cc: Dan McLeon, MS DEQ
Ron Murphy, Grenada, MS
W. R. Donley, K-1750
R. S. Ohlis, K-1750
J. R. Batchelder, K-1701
Anaxis Duhon, Woodward Clyde Consultants, Baton Rouge, LA



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA
TEL: 412 227-2430 FAX: 412 227-2042

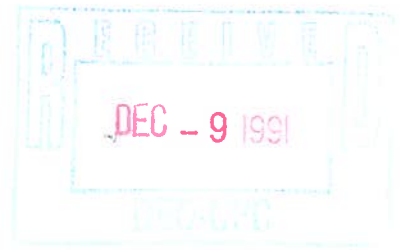
LAW DEPARTMENT

Jill M. Blundon
General Counsel
Thomas Burgunder
Thomas F. Reid
George Carroll
Mary Dombrowski Wright
Billie Schrecker Nolan
William F. Giarla
Mary C. Fairley
J. Mark Hansen
Donna J. Morris

December 4, 1991

VIA FEDERAL EXPRESS

John S. Shaffer, Esquire
Newcomer, Shaffer, Bird & Spangler
Corner of Lynn & Maple Streets
Bryan, Ohio 43506-16



RE: Wayne E. and Lucille Carlin
Grenada, Mississippi Property

Dear Mr. Shaffer:

Thank you so much for your most recent correspondence, wherein you indicated Mr. Carlin's willingness to execute the revised access agreement. His actions are most helpful to Beazer East, Inc. in its continuing efforts to fully and promptly investigate the environmental conditions at the Grenada plant site. To that end, I have drafted and enclosed two (2) execution copies of the revised agreement. Please note that a paragraph has been added to reflect our agreement regarding the shallow soil samples. After Mr. and Mrs. Carlin have executed the originals, please return one (1) copy to me for our files.

Again, your cooperation is much appreciated. As always, if you have questions or comments, please do not hesitate to call or write.

Sincerely,

J. Mark Hansen

cc: J.A. Werling, Beazer East
J.H. Scarbrough, EPA Region IV
D. Peacock, MDEQ
J. Bachelder, KII

DIVISION OF SOLID WASTE

REVIEWED BY DKP
DATE 12/09/91
COMMENTS File - Compl.

ACCESS AGREEMENT

Wayne E. Carlin and Lucille B. Carlin as owner of the real estate known as Parcel 2, T22N, R5E, Section 33, Grenada County, Grenada, MS (hereinafter "Owner") hereby grants to Beazer East, Inc., formerly Koppers Company, Inc. (hereinafter "Beazer"), its employees agents and contractors, the right to, at Beazer's sole cost and expense, enter upon said real property for the sole purpose of surveying, excavating, drilling, coring, sampling, construction of water or other wells and well testing to be located on the said property. The locations of the wells to be installed are shown on Keystone Environmental Resources, Inc., Drawing No. A105096.

Such surveying, excavating, coring, sampling, construction of water or other wells and well testing is being conducted as part of a Groundwater Quality Assessment Investigation and a Resource Conservation and Recovery Act Facility Investigation (RFI).

Beazer also agrees to take three (3) soil samples, at locations to be specified by Owner, at depths of 1 to 2 feet, and have those samples analyzed for constituents of concern as specified in the RFI, all at Beazer's sole cost and expense.

It is expressly agreed and understood that this Agreement shall not operate or be construed to create the relationship of landlord and tenant between the parties hereto under any circumstances whatsoever and Owner has absolute, complete and unimpeded right to deal with the real property in question as any other party with fee simple title except that Owners, their heirs, administrators, executors, successors and assigns shall, during the term of this Access Agreement, in no way interfere with the integrity of any water wells constructed on the property by Beazer, its employees, agents or contractors and the right of ingress and egress by Beazer, its employees, agents or contractors to monitor said water wells. This agreement is not to be considered as an easement for Beazer.

Beazer shall provide Owner with all written reports, data, information, conclusions, recommendations and all other work product that impact on the environmental condition of the property, provided such written material is given by Beazer to the Mississippi Department of Environmental Quality or United States EPA.

Beazer agrees to defend, indemnify and save harmless Owner, from all losses, claims, liabilities, expenses and costs (including

death) occurring in connection with Beazer exercise of the rights herein granted, or arising from any wrongful or negligent act or omission of Beazer, its employees, agents or contractors, in the performance hereunder.

At such time when monitoring wells and other exploratory borings are no longer needed, Beazer shall remove and abandon each in accordance with applicable requirements of the State of Mississippi.

Upon removal of the wells, Beazer agrees to return the site to its original condition.

This agreement shall be and remain in effect for a period of fifteen years from the date hereof, and thereafter shall be automatically renewed from year to year until terminated by either party giving to the other not less than sixty (60) days period written notice of termination; provided, however, that any termination of this agreement by either party shall not occur without the prior written consent of the Mississippi Department of Environmental Quality or the United States EPA as the case may require.

IN WITNESS WHEREOF and intending to be legally bound, the parties hereto have caused this instrument to be duly signed this 5th day of December, 1991.

BEAZER EAST, INC.

By:

RG Hamilton

R. G. Hamilton
Vice President and General
Manager - Environmental Group

Title:

Date:

December 5, 1991

Witness:

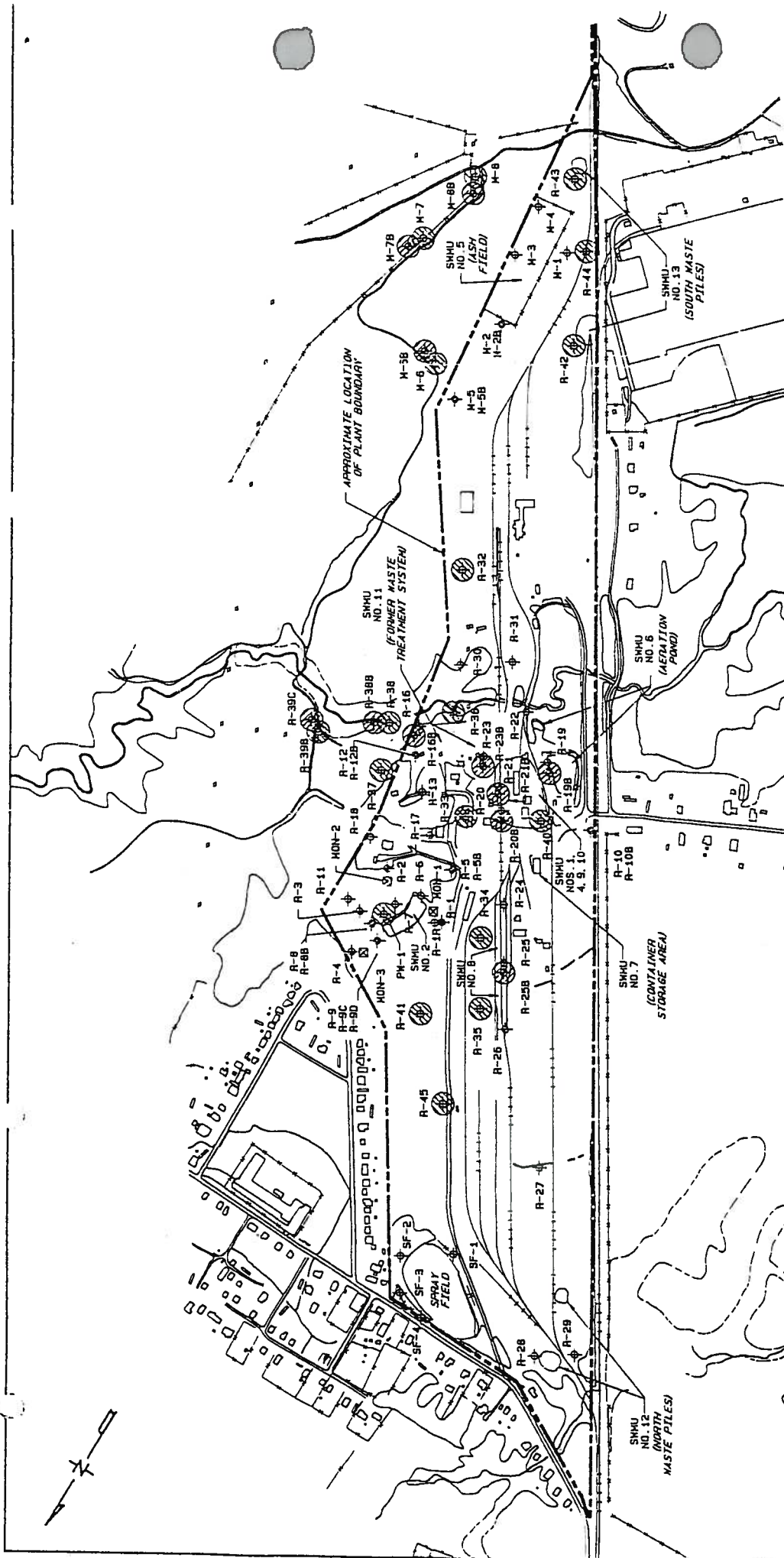
Barbara A. Williams

WAYNE E. CARLIN

Witness: _____

LUCILLE B. CARLIN

Witness: _____



LEGEND

- ⊕ - EXISTING SHALLOW MONITORING WELL
- ⊕ - EXISTING MONITORING WELL NEST
- ⊕ - DECOMMISSIONED MONITORING WELL
- ⊕ - PROPOSED PHASE II SHALLOW MONITORING WELL
- ⊕ - PROPOSED PHASE II DEEP MONITORING WELL



KEYSTONE
ENVIRONMENTAL RESOURCES, INC.

FIGURE 5-3

APPROXIMATE EXISTING & PROPOSED
PHASE II MONITORING WELL LOCATIONS
GRENADE, MS

KOPPERS INDUSTRIES, INC. 1/8/91



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
RAY MABUS
GOVERNOR

FILE COPY

December 2, 1991

CERTIFIED MAIL NO P 868 026 172

Mr. Steven T. Smith
Program Manager - Environmental
Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Re: Burning of Hazardous Waste
Koppers' Grenada, MS Facility
MSD 007 027 543

Dear Mr. Smith:

Enclosed please find several recently promulgated Mississippi State laws and regulations that may have some impact on decisions you make concerning operations at your Koppers' facility located in Grenada, Mississippi.

At the conclusion of our meeting of November 19, 1991, several issues that were addressed, remained unresolved. First, the issue of whether Koppers' proposal to burn hazardous wastes in its' boiler would constitute a commercial hazardous waste facility was discussed. It was agreed by all parties that Koppers would request clarification of this point via submittal of a written outline that detailed their proposed operational plans concerning their intent to burn hazardous waste from other facilities (Koppers or non-Koppers facilities) to the Mississippi Department of Environmental Quality. Upon receipt of the above request, MDEQ will pursue the appropriate channels to resolve the issue. Secondly; during the meeting, and again in this letter, MDEQ would strongly like to emphasize the point that boiler clean-out procedures previously submitted to this office do not appear to be adequate. Submittal of an appropriate plan for clean-out and testing of the boiler, conveyance system, and any other piece of equipment that has been employed in the burning of hazardous waste and will be utilized during the non-hazardous burn cycle, prior to disposal of the residue in any manner other than as a hazardous waste is vital in securing this office's approval.

Please feel free to contact me at (601) 961-5220 if you have any questions or comments concerning the above letter.

Sincerely,

David K. Peacock

David K. Peacock
Hazardous Waste Division

cc: Mr. James S. Kutzman - EPA

FROM: BEAZER EAST, INC.

TO:

6013546612

NOV 20, 1991 12:23PM P.02

Beazer

BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA
TEL: 412 227-2430 FAX: 412 227-2442

LAW DEPARTMENT

Jill M. Blunden
General Counsel
Thomas Burgunder
Thomas F. Reid
George Carlini
Mary Opatrowski Wright
Billie Scherker Nohrn
William F. Garla
Mary C. Fidler
J. Mark Hansen
Donna J. Morris

November 20, 1991

REVIEWED BY DKP

DATE 11/20/91

COMMENTS _____

VIA FACSIMILE

John S. Shaffer, Esquire
Newcomer, Shaffer, Bird & Spangler
Corner of Lynn & Maple Streets
Bryan, Ohio 43506-16

RE: Wayne E. and Lucille Carlin
Grenada, Mississippi Property

Dear Mr. Shaffer:

When we last talked by telephone, on Friday, November 8, 1991, I indicated that Beazer was willing to limit the term of the access agreement for Mr. Carlin's property to fifteen (15) years, and would further take three shallow soil samples (at locations to be determined by Mr. Carlin) and have those samples evaluated at an EPA-approved laboratory, all at Beazer's expense. You indicated that you would forward Beazer's compromise position to Mr. Carlin and contact me with his response.

I have on three occasions attempted to contact you by telephone to determine if you were able to reach Mr. Carlin. As of today I have heard nothing from you or Mr. Carlin in response to our settlement initiative. The resolution of this issue is of vital importance to Beazer because the investigative work at the Grenada plant site cannot continue according to the plans submitted by Beazer, and approved by the Mississippi Department of Environmental Quality, without off-site access to Mr. Carlin's property. I also feel that Beazer has been cooperative and forthcoming in its dealings with Mr. Carlin, and responsive to his concerns.

I urge you to contact Mr. Carlin as soon as possible, and let me know when the access transaction may be completed. As always, if you or Mr. Carlin have questions, comments, or otherwise wish to discuss these issues, please do not hesitate to give me a call. Your prompt attention to this important matter is much appreciated.

Sincerely,


J. Mark Hansen

cc: J.A. Werling - Beazer East
J. Mark Hansen - EPA Region IV

RE: MEETING WITH KOPPERS CONCERNING BIF REQUIREMENTS - 11/19/91

ATTENDEES : Mr. J. D. "Rock" Clayton - Koppers (Grenada)
Mr. Dudley DeVille - Woodward-Clyde
Ms. Anaxis Duhon - Woodward-Clyde
Mr. Bill Donley - Koppers (Pittsburgh)
Mr. Steve Smith - Koppers (Pittsburgh)
Mr. Steve Spengler - MDEQ-HW
Mr. David Peacock - MDEQ-HW
Mr. Dan MacLeod - MDEQ-Air

ISSUE # 1 - What did State feel was adequate to meet "closure"?

Koppers felt that the testing of ash (using TCLP Methodology) generated after 24 hours of clean burning should be satisfactory to indicate that ash was non-hazardous and could be disposed in that manner. Koppers version of clean-out after burn using hazardous material consisted of 24 hours of burning using only wood chips, followed by a "scrub and vacuum" procedure inside equipment that had contacted hazardous material. State expressed it's opinion that not only was merely testing of the ash inadequate, but TCLP procedure was inappropriate. State felt that after the 24 hour clean burn and "scrub and vacuum" procedure, a wipe test on remaining residue should be conducted and analyzed for hazardous constituents that caused the F032-F034 listing. This analysis should meet standards mutually determined using either (1) a background level of constituents, or (2) health-based numbers.

Conclusion : Kopper's still seemed to believe that the testing of the ash was the appropriate method for determining if the boiler had actually been "clean closed". Unresolved!!

ISSUE # 2 - Was the clean out procedure adequate?

State expressed some reservations concerning ability of the scrub and vacuum method to totally remove all contamination. Questions still to be resolved include (1) how will those pieces of equipment that are contaminated prior to burning actually be cleaned, (2) who will conduct these clean-out operations and what type of training will they have,

ISSUE # 3 - What can Koppers burn ?

Koppers questioned whether burning spent treated wood (a non hazardous waste) would present problems. State (HW) stated that it saw no regulatory problem with the proposal. State (Air) stated that burning of treated wood could alter their emissions, but otherwise saw no problem.

Koppers also asked for State's opinion of the burning of coal tar waste (listed K waste). State (HW) stated that while it didn't view it as a problem several issues needed to be considered. First, a revised Part A would have to be received and a public notice period followed. Secondly, whatever additional constituents that

caused these K wastes to be listed would have to be tested for and appear in the submitted "closure plan". State (Air) stated that this could require a modification of Kopper's existing air permit.

ISSUE # 4 - What would cause Kopper's to be considered a "commercial hazardous waste facility?"

The question arose as to Kopper's designation since under the present scenario, Koppers will be receiving hazardous waste from its other facilities around the U.S.. State (HW) expressed its opinion that since Koppers was only accepting waste from its own sister facilities and was not charging a fee, then they would not be considered a commercial hazardous facility. State (Air) stated that the Air Division may take a different view of this, stating that in the past, under similar circumstances, they have determined that facilities should fall under the commercial heading. It was agreed that Koppers would submit (in writing) a request for clarification to both HW and Air. Koppers also posed the question of accepting similar waste from other companies for a fee. Both HW and Air stated that this would clearly classify them as a commercial facility.



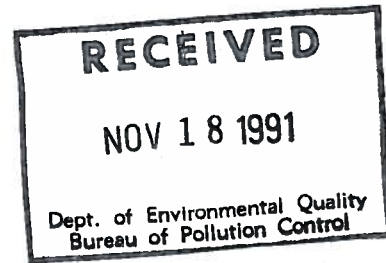
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4WD-RCRA&FF

Mr. Sam Mabry, Chief
Hazardous Waste Division
Mississippi Department of
Environmental Quality
Post Office Box 10385
Jackson, Mississippi 39209



Re: Submittal of Financial Test/Corporate Guarantee When
Corporate Fiscal Year Changes

Dear Mr. Mabry:

Increasingly, the continuous demonstration of financial responsibility for hazardous waste facilities using financial tests and/or corporate guarantees are being affected through corporate mergers, leverage buyouts and others means of co-mingling of corporate assets. This often results in a change in the corporation's fiscal year; thereby causing a delay in the submittal of a new financial test to take effect upon expiration of the financial test currently being used. The result is that usually in such cases there is a period of anywhere from three (3) to six (6) months when financial responsibility is not being demonstrated.

There have been numerous occasions in Region IV when facilities have asked for extensions on the time they are allowed to submit the financial test. Granting such requests gives tacit approval of a facility's non-compliance with the financial responsibility regulations. It is imperative that continuous financial responsibility be demonstrated at all times. Therefore, in such situations, the facility must submit an alternate financial mechanism (i.e., Letter of Credit, Surety Bond etc.) to demonstrate financial responsibility for the interim period not covered by an acceptable financial test.

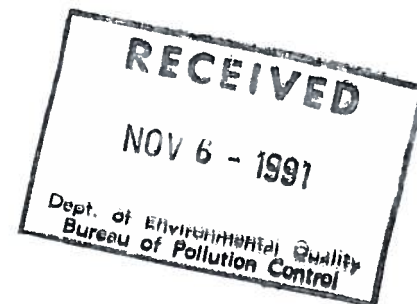
If you have any questions, please contact J. R. Finney II of my staff at 404/347-7603.

Sincerely yours,

James S. Kutzman, P.E.
Associate Director
Office of RCRA and Federal Facilities
Waste Management Division

cc: Mr. Steve Spengler, MS Financial Contact

November 4, 1991

EPA Region IV Office
EPA Regional Preparedness Coordinator
345 Courtland Street
Atlanta, Ga. 30365

RE: Continuous Release, Notification of Change

Gentlemen:

This is a notification of changes in quantity of a continuous release from the facility identified below. The amount released has been eliminated due to construction of a drip pad to intercept and recover drippage. Since continuous release has ended, the first year follow-up notification will not be made. The following information is provided in accordance with 40 CFR 302.8 (g).

1. Facility Identification:

Koppers Industries, Inc., Grenada Plant
P.O. Box 160, Tie Plant Road, Tie Plant, Ms. 38960
Latitude: 33 Degrees, 44 Minutes, 00 Seconds
Longitude: 89 Degrees, 47 Minutes, 00 Seconds
National Response Center case number: 40739
Facility Dunn and Bradstreet Number: 00-702-7543
Person in charge: J.D. Clayton - Plant Manager, 601-226-4584

DIVISION OF SOLID WASTE

REVIEWED BY DKPDATE 11/7/91COMMENTS File - Compliance2. Population density within one mile radius of facility:
More than 1000 persons3. Sensitive populations and ecosystems within one mile radius:
Tie Plant Elementary School located ½ mile N.E. of plant
400 students, 60 faculty members.

4. Change in Continuous Release:

This facility previously reported a continuous release based on estimated drippage of creosote from freshly treated wood products onto unlined portions of the treating plant process areas. Since then, the concrete drip pad has been extended to line the process areas where drippage occurs. Such drippage is now intercepted and recovered to the preserving process. The amount of continuous release of creosote is now estimated to be less than the reportable quantity of one pound per day.

(Cont'd)

Certification

This report of change in continuous release is accurate and current to the best of my knowledge.

Sincerely,


J. D. Clayton
Plant Manager

JDC/jrb

CC: Steve Smith K-1800
Hazardous Waste Division
State Of Mississippi
Dept. of Environmental Quality
2380 Highway 80 West
Jackson, Ms. 39204



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
RAY MABUS
GOVERNOR

October 30, 1991

CERTIFIED MAIL NO. P 868 026 153

James A. Werling
Program Manager - Environmental Services
Beazer East, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219

Re: Off-site Access Agreement
Koppers' Grenada, MS Facility
MSD 007 027 543

Dear Mr. Werling:

Over a period of several months, Beazer has entered into negotiations with Mr. Wayne E. Carlin, in an attempt to secure an access agreement for property adjacent to the southeastern corner of the Koppers facility. As you are well aware, this off-site access is critical, in that the numerous groundwater monitor wells that are to be installed there constitute a significant portion of the EPA-required RCRA Facility Investigation (RFI), as well as the State required Groundwater Quality Assessment (GWQA) programs. In a letter originating from yourself to Mr. James Scarbrough - EPA, dated August 30, 1991, Beazer declared the off-site problem a "force majeure" event, and at the present time the situation remains unresolved. We do not agree that this is the case.

Because of the critical role that the placement of these monitor wells would play in fully evaluating the extent of off-site contamination at the property in question, the Mississippi Department of Environmental Quality feels that the interests of all concerned parties, including the citizens of the State of Mississippi, would best be served by a quick resolution to the impasse that exists. To this end MDEQ has conducted a review of all correspondence that pertains to the off-site access problem at the Koppers' facility. As a result of the review, this office has determined that as of the final correspondence, dated August 14, 1991, three major areas of difference still exist between Beazer and the property owner, Mr. Wayne Carlin. Below is a listing of each one of these areas of concern, followed by MDEQ's understanding

Mr. James Werling
October 30, 1991
Page 2

of the problem, as well as our expressed opinion as to best possible approach to an amicable compromise.

- (1) Term of access agreement. All agreements prior to the Beazer submittal of August 14, 1991 had an open-ended termination date for the proposed access. Mr. Carlin expressed his desire for an agreement to contain a written termination date for the proposed access, somewhere in the area of five (5) years. Beazer's proposal of August 14, 1991, set a term of fifteen (15) years or a period when the proposed monitor wells would no longer be needed as the time frame of the present proposal. After several telephone conversations between Mr. Carlin and this office, Mr. Carlin verbally expressed his opinion that the above-mentioned fifteen year term would be acceptable.
- (2) Off-site sampling at property owner's request. From the beginning of the access negotiations, it has been Mr. Carlin's contention that Beazer should provide him with some form of independent sampling or verification of sampling of his property. His original request was that he be allowed to take groundwater samples during sampling events and have those samples sent to an independent laboratory and analyzed (at Beazer's expense). During subsequent telephone conversations with Mr. Carlin, MDEQ assured him that the sampling and laboratory procedures followed EPA and State-approval protocol and the results would be valid. Mr. Carlin has agreed to drop this request; however, he would still insist that Beazer take and analyze, at their expense, three (3) shallow soil borings at locations on the off-site property to be determined by the property owner. It is Mr. Carlin's contention that these samples, if they prove to contain no contamination, would facilitate the leasing of his property to other growers, if he so desires. MDEQ finds Mr. Carlin's request to be perfectly reasonable for two reasons. First, is the fact that he will clearly be inconvenienced, and perhaps suffer to some degree financially by placement of wells on property that is presently under cultivation. Secondly, Beazer has steadfastly refused to financially compensate Mr. Carlin for the use and access rights that would be required for the off-site work required.
- (3) Easement vs. right-of-way terminology. Clearly one of the primary points of disagreement has been the exact wording that you will be used in the access agreement itself. Both your legal department, as well as the attorney representing Mr. Carlin have been unable to agree to the exact terminology that the document should possess. While the MDEQ does not profess to understand all the intricacies of real estate law,


Mr. James Werling
October 30, 1991
Page 3

and therefore will make no determination as to which position should be adopted into a new agreement, it does seem imperative that those advising both parties (Beazer's law department and Mr. John S. Shaffer, Mr. Carlin's attorney) initiate some contact so that the differences can be expressed, and hopefully resolved. In lieu of taking a definite position as to the appropriate language, MDEQ would simply state that agreements of this type are not unusual or rare, therefore, any party taking the position that the agreement has to be worded in an exact and uncompromising structure, would be unacceptable in the opinion of the State.

In summary, MDEQ feels that any new proposal should contain (1) a termination date of fifteen (15) years, (2) should expressly state Beazer's offer to provide Mr. Carlin with the sampling and laboratory analysis of three shallow soil samples, and (3) should contain language, that has previously been determined to be satisfactory to representatives of both parties. MDEQ would also like to strongly express its belief that the burden of obtaining an access agreement lies with the company that created the problem, and not with the off-site property owners. While efforts have been made, MDEQ believes that Beazer has not acted in good faith to meet the requirement to do "everything in its power" to obtain the use of the property in question.

Please respond within ten (10) days of receipt of this letter with a written response and your proposed actions to the access problem in question. Your response will determine the course of action that the State of Mississippi may wish to follow.

If you have any questions or comments concerning the comments above or the requested response, please feel free to contact me at (601) 961-5171.


Wm. Stephen Spengler, P.E., Chief
RCRA Branch

WSS:lfc

cc: Mr. James Scarbrough - EPA

Sam mby

KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588



October 25, 1991

Hazardous Waste Division
State Of Mississippi
Department Of Environmental Quality
2380 Highway 80 West
Jackson, Mississippi
39204

RE: Wood Preserving Drip Pad
Koppers Industries, Inc.
Grenada Plant, Grenada, Mississippi

Gentlemen:

On December 6, 1990 (55 FR 50450) EPA published a final rule listing as hazardous three categories of wastes from wood preserving operations. On June 13, 1991 (56 FR 27332), EPA published an administrative stay of the waste listings which, among other things, conditionally extended the effective date.

In accordance with the stay, we are hereby providing evidence to the EPA that Koppers Industries, Inc. (Koppers) is making good faith efforts to comply and that we do have a reasonable expectation of doing so. This plant has completed work on our drip pad and no further work is required to comply with the regulations. The certification by a registered professional engineer should be completed by November 30, 1991 and will be on file.

Please call me at 601-226-4584 if you have any questions.

Sincerely,

J. D. Clayton
Plant Manager

JDC/jrb

CC: U.S. EPA Regional Office -IV -Atlanta, Ga.
W. R. Donley K-1750
S.T. Smith K-1800

DIVISION OF SOLID WASTE

REVIEWED BY DKP

DATE 11/12/91

COMMENTS Need to have
copy of certification
sent to us.



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
RAY MABUS
GOVERNOR

October 25, 1991

CERTIFIED MAIL NO. P 868 026 148

Russell S. Vorpe
Environmental Department
Regulatory Compliance Section
Beazer East, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1822

FILE COPY

Re: 1991 Financial Assurance
Koppers' Grenada, MS Facility
MSD 007027543

Dear Mr. Vorpe:

This office has reviewed your letter of September 25, 1991, which requested that Koppers' Industries, Inc. be granted a 90-day extension concerning the required financial reporting needed for its Grenada, Mississippi facility. State regulations require that this information be provided no later than 90 days after the close of the corporation's fiscal year. Beazer East, Inc. (formerly Koppers Company, Inc.) ended its fiscal year on June 30, 1991, therefore, requiring that the updated financial documentation be provided to the State no later than September 28, 1991.

It is the Mississippi Department of Environmental Quality's position that the granting of an extension can not and should not occur for the following reasons. First, the Mississippi Hazardous Waste Management Regulations (MHWMR) do not allow the MDEQ leeway to grant extensions in regards to required financial assurance mechanisms. Secondly, MDEQ feels strongly that the required financial assurance mechanisms serve as the only financial recourse that the State could pursue if necessary, and for this reason these mechanisms should never be allowed to lapse. Koppers has been without adequate financial assurance for post-closure care since September 28, 1991. MDEQ finds this to be a major violation of MHWMR 264.145.

Mr. Russell S. Vorpe

October 25, 1991

Page 2

We request that you respond to this apparent violation within five (5) days of receipt of this letter. This response should contain either (1) the current financial documentation necessary to maintain the Financial Test of Beazer East, Inc. as the adequate financial mechanism, or, (2) an alternative mechanism to be used by Koppers during this interim period. MDEQ will review this information before determining if further action including a penalty is warranted. Section 17-17-29 of the Mississippi Code Annotated (Supp. 1989) allows assessments of penalties not more than \$25,000 per day per violation. Failure to submit this information may result in enforcement action.

If you have any questions, please contact me at (601) 961-5220.

Sincerely,

FILE COPY

David K. Peacock
Hazardous Waste Division

DKP:lfc

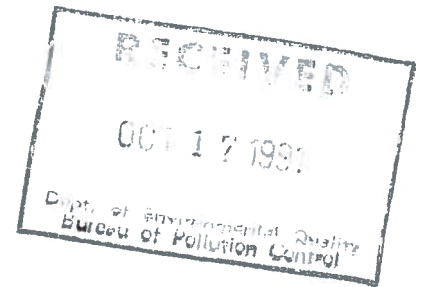
cc: Mr. James H. Scarbrough, EPA

2822 O'Neal Lane
Post Office Box 66317
Baton Rouge, Louisiana 70896
(504) 751-1873
FAX (504) 753-3616

Woodward-Clyde Consultants

October 15, 1991

Mr. Steve Spangler
Mississippi Department of Environmental Quality
2380 Highway 80 West
Jackson, Mississippi 39204



Dear Mr. Spangler:

As a follow-up to our telephone conversation on October 9, 1991, I would like to review some items we discussed in reference to the documents Woodward-Clyde Consultants (WCC) has submitted on behalf of Koppers Industries, Inc. As you mentioned in our telephone conversation, you will try to assign a person within a week to ten days after October 9, 1991 to review the documents "BIF Regulations Precompliance Certification," "Part A Permit Application" and "Ash Disposal Procedures." Since the BIF program is under the jurisdiction of the U.S. EPA, the person that you will assign will be in contact with the U.S. EPA during the review of the documents.

After the review of the documents is complete, Woodward-Clyde Consultants and Koppers Industries, Inc. would like to meet with your staff to discuss your comments. We would also like that appropriate Air Division Representative(s) attend the meeting so that air permitting issues can also be discussed.

Please feel free to contact us at 504-751-1873 or Mr. Steve Smith at 412-227-2677 to schedule a meeting at the earliest date possible.

Sincerely yours,


Anaxis G. Duhon


Dudley J. Deville, P. E.

AGD:kdl

cc: Mr. Steve Smith, Koppers Industries
Mr. J. D. Clayton, Koppers Industries
Ms. Elizabeth Ketcham, USEPA

91B432CB.LTR L&M7

DIVISION OF SOLID WASTE
REVIEWED BY <u>DKP</u>
DATE <u>10/21/91</u>
COMMENTS <u>File - Compl.</u>





STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

October 7, 1991

Mr. James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch - USEPA
Region IV
345 Courtland Street, NE
Atlanta, GA 30365

Re: Third Quarter Groundwater Results
Koppers Industries Grenada Facility
MSD 007 027 543

Dear Mr. Scarbrough:

Enclosed please find the third quarter groundwater monitoring results from Koppers Grenada, Mississippi facility.

Any questions or comments concerning this information can be directed to me at (601) 961-5220.

Sincerely,

FILE COPY

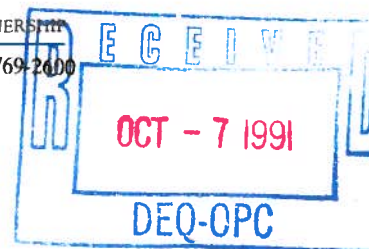
David K. Peacock
Hazardous Waste Division

**DAMES & MOORE**

A PROFESSIONAL LIMITED PARTNERSHIP

4949 ESSEN LANE, SUITE 900, BATON ROUGE, LOUISIANA 70809 (504) 769-2600
FAX NO. (504) 769-3695

September 27, 1991



Mr. David Pecock
Mississippi Department of Environmental Quality
Bureau of Pollution Control
2830 Highway 80 West
Jackson, Mississippi 39204

**RE: Inspection and Repair of
Monitoring Well R-6
Koppers Industries, Inc.
Grenada, Mississippi
MSD007027543
D&M Job No. 18804-096-186**

Dear Mr. Pecock:

On behalf of Beazer East, Inc., Dames & Moore is submitting this letter summary regarding the inspection and repair of monitoring well R-6 at the above-captioned facility.

As noted in the Comprehensive Monitoring Evaluation (CME) report received from the Mississippi Department of Environmental Quality (MDEQ) regarding the December 11, 1990, inspection, monitoring well R-6 was damaged. The damage to the well casing was such that it prevented passage of the bailer down the well.

During the week of September 6, 1991, an experienced Dames & Moore hydrogeologist evaluated the condition of monitoring well R-6. The damage to the well was limited to a bend in the upper portion of the riser pipe; therefore, it was determined that the well was capable of being repaired.

SECTION OF SOLID WASTE
INTERVIEWED BY DKP
DATE 10/8/91
COMMENTS COPY SENT TO
EPA
FILE - Comp

Mississippi Department of Environmental Quality
Attention: Mr. David Pecoek
Page 2
September 30, 1991

The well was repaired by implementing the following procedures:

- Remove the existing well pad, security casing and surficial grout;
- Cut the existing well casing approximately one-inch below the bend;
- Cut the bent section out of the riser pipe;
- Install a two-inch coupling on the existing well casing and replace the riser pipe;
- Secure the two-inch coupling to the well casing and riser pipe using stainless steel screws;
- Replace the grout column around the well casing;
- Install the security casing and place fresh grout to a level one foot above ground level inside of the security casing; and
- Replace the well pad with the surface sloping away from the well to prevent run-on of surface water.

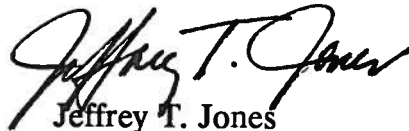
The integrity of the well was inspected on the day following its repair and was found to be in good condition. Passage of the bailer was clear throughout the entire well depth, thus allowing its continued use as a monitoring well.

Mississippi Department of Environmental Quality
Attention: Mr. David Pecock
Page 3
September 30, 1991

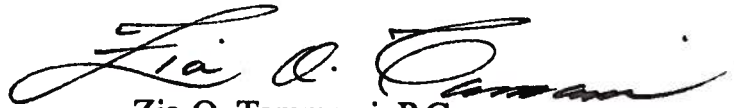
We trust that these procedures will meet with your approval. Should you have any questions or comments regarding the repair of this well, please contact Mr. Jim Werling of Beazer at (412) 227-2189.

Sincerely yours,

DAMES & MOORE
A Professional Limited Partnership



Jeffrey T. Jones
Project Hydrogeologist



Zia O. Tammami, P.G.
Manager, Gulf Geosciences &
Environmental Engineering Services

JTJ/ZOT:sgt

2822 O'Neal Lane
Post Office Box 66317
Baton Rouge, Louisiana 70896
(504) 751-1873
FAX (504) 753-3616

Woodward-Clyde Consultants

September 26, 1991

Mr. Jerry Banks
Mississippi Department of Environmental Quality
2380 Highway 80 West
Jackson, Mississippi 39204



Re: Response to Comments from
Mississippi Department of Environmental Quality
WCC File 91B432C-B

Dear Banks:

Woodward-Clyde Consultants (WCC) has prepared on behalf of Koppers Industries, Inc. (Koppers) a response to the letter submitted to Mr. J. D. Clayton on September 5, 1991 in reference to the BIF Precompliance Certification. Our response to the above-mentioned letter is as follows:

PART A

COMMENT:

1. Section XII, lines 3 and 4 -- What is the unit of measure (yd^3 or m^3)?

Response: The unit of measure is yd^3 , which is coded as Y.

COMMENT:

2. Section XII, line 4 -- What is the unit of measure and number of units?

Response: The unit of measure is yd^3 , which is coded as Y, and the number of units is 001.

COMMENT:

3. Section XII, line 2 -- The process design capacity is given as less than 1 acre while the previous unit capacity is 0.75 acres. What is the exact process design capacity?

Consulting Engineers, Geologists
and Environmental Scientists

Offices in Other Principal Cities



Mr. Jerry Banks - 91B432C-B
Mississippi Department of Environmental Quality
September 26, 1991
Page 2

Response:

The design capacity for the unit in line 2 will be submitted in the revised Part A.

COMMENT:

4. Section XII, line 5 -- How many drums, barrels, etc., are to be stored in this unit?

Response:

Up to 640 drums.

COMMENT:

5. Section XIII -- The given treatment process design capacity is 800 lbs/hr; however Form 2 of the certification indicates a waste feed of some 1900 lbs/hr. Please clarify.

Response: Koppers' state air permit allows Koppers to burn creosote waste at a rate of 800 pounds per hour. Form 2 of the precompliance certification document shows the allowable emissions for metals, HCl, Cl₂ and ash/PM based on the ambient level limits given in the BIF regulations, site-specific air dispersion modeling, and estimated efficiencies. Koppers intends to comply with its current air permit limits, even though higher limits are permitted under the BIF regulations. A revised Part A form will be submitted reflecting all of the above changes under a separate cover.

PART B -- PRECOMPLIANCE CERTIFICATION

COMMENT:

1. Part 266.106(d)(1) states that compliance testing be done to determine the emission rate of each metal.

Mr. Jerry Banks - 91B432C-B
Mississippi Department of Environmental Quality
September 26, 1991
Page 3

Response: As described in the "BIF Regulations Precompliance Certification," page 8, Koppers plans to conduct a trial burn to demonstrate DRE compliance. The trial burn will also demonstrate compliance with the allowable feed and emission rates.

Section 266.106 of the regulations describes the standards to control metal emissions and Subsection (d)(1) specifically describes the standards to control emissions using the Tier III approach. In this subsection, the U. S. EPA refers to emissions testing as one of the steps to verify that acceptable ambient levels are not exceeded. Although Koppers has not conducted emissions testing for the certification of compliance, the maximum allowable feed rates were "back-calculated" using the Tier III acceptable ambient level concentrations published in the BIF regulations. These calculations were based on best engineering judgment, equipment efficiencies, partitioning factors, etc. According to the calculations, the ambient level concentrations will not be exceeded if the calculated feed rate limits are not exceeded. As mentioned previously, Koppers intends to demonstrate compliance with the acceptable ambient level concentrations by conducting a compliance test.

COMMENT:

2. **Please provide a copy of the HCl stack test along with a justification that the method used is valid when compared to the HCl method referenced in the BIF regulations.**

Response: A copy of the 1982 HCl stack test has been attached with this letter. In addition, the method used was compared to the two most current methods published in the Federal Register (July 17, 1991, pages 32728 and 32736, Methods 3.3.1 and 3.3.2). In the method used for the 1982 HCl stack test, only a caustic solution was used to collect chloride/chlorine, instead of an acidic and then a caustic solution as is currently required. Also, the impinger solution was 1 percent (wet) sodium hydroxide, while currently it is required to be 0.1 N sodium hydroxide. The chloride was analyzed with ion chromatography as presently required by the U. S. EPA.

Mr. Jerry Banks - 91B432C-B
Mississippi Department of Environmental Quality
September 26, 1991
Page 4

A comparison of the 1982 HCl stack test to the methods published around that time indicates that the collection and analysis of the samples were conducted in accordance with the techniques published in guidance documents of that time. The documents reviewed were as follows:

Sampling and Analysis Methods for Hazardous Waste Combustion, Arthur D. Little, February 1984, PB84-155845.

Guidance Manual for Hazardous Waste Incinerator Permits, U.S. EPA, July 1983, PB84-100577.

Performance Evaluation of Full-Scale Hazardous Waste Incinerators, Midwest Research Institute, November 1984, PB85-129534.

Koppers has taken a conservative approach by using the 1982 HCl stack data to calculate the efficiency of the boiler to destruct and/or remove HCl. If the current technique for sampling and analysis would have been used, the Cl_2/Cl values may have been higher, since two impinger solutions are currently required instead of one. Therefore, the current method of sampling and analysis, which will be used during the compliance test, should show a higher removal efficiency.

COMMENT:

3. **Part 266.122(b) basically puts forth the staff's opinion concerning a "closure" of the boiler to allow the residues to be disposed of as non-hazardous waste. The waste-feed mechanism, boiler, and all equipment coming in contact with the hazardous waste and its residues must be decontaminated and proven that no toxic constituents attributable to the hazardous waste are above health based limits. This also applies to the residues. Since the hazardous waste burned is a listed waste, the TC analysis is useless for a "closure" type procedure.**

Response: Koppers will address the Mississippi Department of Environmental Quality's (MDEQ) concerns about the analysis of toxic constituents attributable to the hazardous waste instead of the TC analysis. Koppers proposes to meet with the MDEQ prior to making revisions in the "Ash

Mr. Jerry Banks - 91B432C-B
Mississippi Department of Environmental Quality
September 26, 1991
Page 5

Disposal Procedures" document to develop a mutually acceptable procedure.

PART C -- OTHER

COMMENT:

1. **What type sampling and analysis plan will be instituted to assure that HCl, Cl₂ and metal feed rates do not exceed the allowable? Section 265.13 requires a written waste analysis plan that must be submitted to the Office of Pollution Control for review and concurrence.**

Response: A draft copy of the sampling and analysis plan will be provided to the MDEQ prior to our meeting.

COMMENT:

2. **Provide documentation of compliance with interim status requirements of 266.103(a)(4); specifically,**
 - (a) **waste analysis plan**
 - (b) **security**
 - (c) **general inspection requirements**
 - (d) **personnel training**
 - (e) **preparedness and prevention "plan"**
 - (f) **contingency plan and emergency procedures**
 - (g) **manifesting, record keeping and reporting**
 - (h) **closure cost estimate**
 - (i) **financial assurance for closure**
 - (j) **financial responsibility for bodily injury and property damage to third parties by accidents**
 - (k) **air emission standards for equipment leaks**
 - (l) **use and management of containers**

Response: Documentation describing procedures to fulfill requirements for the items described above will be completed prior to resuming burning of

Mr. Jerry Banks - 91B432C-B
Mississippi Department of Environmental Quality
September 26, 1991
Page 6

hazardous waste and copies will be provided to your offices for your information.

ENVIRONMENTAL QUALITY

COMMENT:

3. Provide a closure plan by February 21, 1992.

Response: A closure plan will be submitted by February 21, 1992.

Koppers and WCC would like to schedule a joint meeting with your office and the MDEQ's air pollution office to discuss implementation of the waste burning program. We would like to resolve any potential areas of conflict before such occasions arrive. Please call us at 504-751-1873 or Steve Smith at 412-227-2677 to arrange time, place and date for a meeting. The meeting can be either at the Koppers, Grenada Plant or at your office.

Very truly yours,



Anaxis G. Duhon


Dudley J. Deville, P. E.

AGD:jc

cc: Mr. Stephen Smith, Koppers Industries, Inc.
Mr. J. D. Clayton, Koppers Industries, Inc.
Ms. Elizabeth Ketcham, U.S. Environmental Protection Agency

KOPPERS COMPANY, INC.
GRENADA, MS
BOILER STACK TESTS
WITH SLUDGES MIXED IN FUEL



Prepared by: John T. Kane, Jr.
Air Quality Engineering
Environmental Resources
Koppers Company, Inc.
August 4, 1982

TABLE OF CONTENTS

	<u>Page</u>
Introduction.....	1
Regulations.....	2
Process Description.....	2
Test Procedures.....	3
Results.....	5
Conclusions.....	7
Figure 1 - Temperature Readings.....	9
Table 1 - Creosote Sludge Tests.....	10
Table 2 - Penta-In-Oil Tests.....	12

Appendix A

Field Data Sheets

Penta-In-Oil Tests

100 lb/hr GR-BS-19.....	A-1
GR-BS-18.....	A-2
GR-BS-17.....	A-3
250 lb/hr GR-BS-16.....	A-4
GR-BS-15.....	A-5
GR-BS-14.....	A-6
400 lb/hr GR-BS-13.....	A-7
GR-BS-12.....	A-8
GR-BS-11.....	A-9

Creosote Tests

100 lb/hr GR-BS-10.....	A-10
GR-BS-9.....	A-11
GR-BS-8.....	A-12
250 lb/hr GR-BS-7.....	A-13
GR-BS-6.....	A-14
GR-BS-5.....	A-15

TABLE OF CONTENTS (Cont.)

	<u>Page</u>
400 lb/hr GR-BS-4.....	A-16
GR-BS-3.....	A-17
GR-BS-2.....	A-18
Background Test	
GR-BS-1.....	A-20
Computer Printout-Test Results	
Background Test	
GR-BS-1.....	A-22
100 lb/hr GR-BS-2.....	A-26
GR-BS-3.....	A-30
GR-BS-4.....	A-34
250 lb/hr GR-BS-5.....	A-38
GR-BS-6.....	A-42
GR-BS-7.....	A-46
400 lb/hr GR-BS-8.....	A-50
GR-BS-9.....	A-54
GR-BS-10.....	A-58
Penta-In-Oil Tests	
100 lb/hr GR-BS-11.....	A-62
GR-BS-12.....	A-66
GR-BS-13.....	A-70
250 lb/hr GR-BS-14.....	A-74
GR-BS-15.....	A-78
GR-BS-16.....	A-82
400 lb/hr GR-BS-17.....	A-86
GR-BS-18.....	A-90
GR-BS-19.....	A-94

Appendix B

Grenada Boiler Plant Permit.....	B-1
Federal Guidelines on Incinerator Emissions.....	B-7
Federal Register Vol. 46 No. 15 1/23/81	
40 CFR Parts 122, 264, and 265	

TABLE OF CONTENTS (Cont.)

Page

Amendments to Incinerator Guidelines.....B-19

Federal Register Vol. 47 No. 122 6/24/82

40 CFR Parts 122 and 264

Appendix C - Chemical Analysis

Creosote Sludge Analysis.....C-1

Creosote Tests POHC Catch Analysis.....C-2

Penta Tests Chlorine Catch Analysis.....C-4

Penta Tests Chloride Catch Analysis.....C-5

Penta Tests Ash and Flyash Cl Analysis.....C-6

Penta Tests Penta, OCDD, and HCDD Catch Analysis.....C-7

Appendix D - Steam Charts

May 18.....D-1

May 19.....D-2

May 20.....D-3

KOPPERS COMPANY, INC.
GRENADA, MS
BOILER STACK TESTS
WITH SLUDGES MIXED IN FUEL

Introduction

During the week of May 17, 1982, studies were undertaken to examine the effect of disposal of wood-treating sludges utilizing thermal destruction in the existing plant boiler. The facility at which these diagnostic tests were undertaken is the the Grenada, Mississippi, tie plant. Sludges which were burned were penta-in-oil sludge and creosote sludge. These sludges are generated by pressure treating wood with these materials. The sludges were burned with the primary boiler fuel which is wood chips.

The tests were conducted by Koppers Air Quality Engineering. State of Mississippi Bureau of Pollution Control official, Dan McLeod, viewed the testing, which was allowed because of a source permit modification granted by the Bureau.

Destruction and removal efficiency of the thermal destruction process were determined by stack gas measurement of primary organic hazardous constituents found in each sludge. Effectiveness of this disposal process met the criteria established by Federal guidelines for the operation of incinerators.

No regulation exists for this source covering the parameters examined, other than particulate and visible emissions. However, the compliance of this source with the strict incinerator guidelines shows Koppers' desire to meet with a disposal problem in a safe way, utilizing the intent of resource conservation and recovery.

Regulations

Source emissions for the tie plant boiler are regulated by conditions set forth in the Permit to Operate Air Emissions Equipment as issued by the State of Mississippi, Department of Natural Resources. The permit was originally issued December 11, 1979, and modified May 11, 1982, to allow the test burning of waste materials as additives to the wood fuel. Emissions, as limited by the modified permit, are 0.3 grains/DSCF and opacity limit of no greater than 40%.

A condition added to the emissions limits is the determination of various parameters of the stack gas as indicated in the Federal guidelines for hazardous waste disposal through incineration. These guidelines require the measurement of the destruction and removal efficiency (DRE) for the primary organic hazardous constituents (POHCs). The desired DRE is 99.99% of each POHC through the thermal destruction unit and flue gas cleanup equipment. Also regulated by these guidelines is the emission of hydrogen chloride (HCl). Current regulation (June 24, 1982) requires removal of HCl from stack gas to less than 4 lb/hr, or to an efficiency where one percent of the HCl in the inlet stream is not removed, whichever is more on a mass basis.

Particulate emissions are also regulated in the Federal document. However, the source permit granted by the State overrides this guideline. The Federal guidelines, as they appear in the Federal Register, are included in Appendix B along with the source permit. The use of the Federal incinerator guidelines for a boiler is done because of a lack of any other guidance.

Process Description

The facility at which the test burns were conducted is the indirect fired steam generator at the Grenada tie plant. The boiler is a cogeneration

unit providing both the steam and electrical needs for the production facility. The unit is fired with bark (wood waste) as the primary fuel. Process sludges were mixed with the bark on the fuel feed conveying system. The sludges consisted of materials cleaned from the bottom of wood treating cylinders and is classified under two categories according to process. The first category is creosote sludge waste generated from pressure treating wood with creosote. The second waste is from treating cylinders where wood is pressure treated with pentachlorophenol in oil.

Boiler loadings for the sludge burning conditions were as follows:

<u>Creosote (lb/hr)</u>	<u>Steam Load (lb/hr)</u>
100	24,000
250	26,000
400	26,000
<u>Penta in Oil (lb/hr)</u>	<u>Steam Load (lb/hr)</u>
100	22,000
250	20,000
400	16,000

These numbers represent an estimate of the hourly production rate taken from the steam tables included in Appendix D.

Test Procedures

The number of tests run for the combustion evaluation was greatly expanded because of an interpretation by State officials of test procedures submitted by this department. This interpretation meant three tests would be performed for each sludge firing condition, instead of the intended one test. The

following is a discussion of the procedures used for the necessary determinations of parameters for each sludge.

- A. Creosote sludge: Creosote waste from the treating cylinders was added at rates of 100, 250, and 400 lb/hr. Sludge was added for a period of one-half hour prior to any testing. Under each condition, three tests were run to determine the amount of POHC in the stack gas. This determination was done by condensing and absorbing the POHC in the impinger catch of the sampling train. No particulate removal apparatus was provided in the sampling train. The actual sampling train was a modified EPA method 5 train with the cyclone and filter excluded. EPA methods 1 through 4 were followed to determine sampling points, and stack gas velocity, moisture content and fixed gas concentration.

Creosote POHC content of the probe wash and impinger catch and rinses was extracted with methylene chloride and concentrated to a suitable volume for analysis by liquid injection gas chromatography. The results of this procedure showed the 18 organic compounds usually associated with creosote to be less than detectable. A more elaborate analytical procedure was undertaken. This method involved use of high-pressure liquid chromatography, which would increase the sensitivity by two decimal places. However, this method looks for only naphthalene, acenaphthene, fluorene, phenanthrene, fluoranthrene, pyrene, and chrysene. The other 11 creosote components cannot be analyzed for under this determination.

- B. Penta-in-oil sludge: Penta-in-oil sludge was added to the bark fuel in 100, 250, and 400 lb/hr increments. Again, the sludge for each increment was added one-half hour prior to any stack tests. EPA methods 1 through 4 were utilized to

determine sampling points, stack gas velocity, and stack gas moisture and fixed gases contents. Further modifications of the sampling train used in the creosote tests were required to insure the collection of the pentachlorophenol, the dioxin impurities found in technical penta, and chloride and chlorine in the stack gas. One modification was the addition of a glass canister which supports a porous polymer resin (XAD-2). The sampled gas stream passed through this resin before being processed through the desiccant. In order to facilitate the operation of the resin canister, particulate removal equipment (filter and cyclone) was used in the hot box, as particulate tends to blind the resin support. Also, the solutions in the first and second impingers were aqueous 0.1 N sodium hydroxide solutions. This solution was used to absorb gaseous chloride and chlorine as well as condense POHCs. The probe and glassware used during a given test were rinsed with benzene. The filter, impinger catch and XAD resin were extracted with benzene. The extracts and rinse were combined and condensed for the gas chromatographic work. The aqueous solution was analyzed for inorganic chloride and free chlorine.

Samples of the fly ash and boiler ash were taken to allow a material balance to be performed on the chloride.

Results

Summation of results of the test burns are contained in Tables 1 and 2. Table 1 contains the results of the creosote burns. The destruction and removal efficiencies (DRE) of seven hydrocarbons comprising 57% by weight of the creosote components identified in the sludge feed are listed in this table. All but two DREs are better than the 99.99% efficiency level, as listed in the Federal incinerator regulations. The two DREs which do not

make the required level are fractionally lower (99.988% for acenaphthene and 99.989% for pyrene; 100 lb/hr test) than the desired destruction and removal limits. Although these DRE's are essentially 99.99%, the reason for the slightly lower level could be the small amount of these components introduced by the sludge addition. The actual destruction and removal of these components through thermal destruction is not difficult as seen in the corresponding DREs in the 250 and 400 lb/hr results. The DREs at these increased loadings are all over 99.99%.

Test results were not adjusted for background levels of creosote components produced through the combustion of wood. The production of polynuclear aromatic hydrocarbons through thermal destruction fossil fuels, wood and municipal waste is widely publicized.^{1,2} R. Clement and W. Karasek in their work indicate the association of the highest concentration of PAH in the smallest sized particles. Therefore, it is reasonable to find background levels of creosote components in the stack gas. Actual emissions were not corrected for background to allow the DRE to be an absolute calculation in regards to the mass loading of a POHC being emitted.

The calculation for the removal of pentachlorophenol produced equally satisfactory DREs. All three feed loading rates resulted in a DRE of greater than 99.99%. Emissions of dioxins, OCDD and HCDD were extremely low. HCDD was not detected in any test. OCDD was detected, resulting in DREs less than 99.99%, but better than 99.5% for 250 lb/hr and 400 lb/hr feed rates. The maximum emission rate detected for any test was 6.4×10^{-5} lb/hr or about 0.6 lb/yr.

¹R. E. Clement and F. W. Karasek, "Distribution of Organic Compounds on Size-Fractionated Municipal Incinerator Fly-Ash Particles," Journal of Chromatography, 234 (1982) 395-405.

²Mark A. Golembiewski, "Environmental Assessment of a Waste-To-Energy Process: Burlington Electric's Wood and Oil Co-Fired Boiler," National Technical Information Service, EPA-600/7-80-148, August 1980.

Hydrogen chloride (HCl) was detected in small quantities. The highest emission rate was less than 0.2 lb/hr, which is below the 4 lb/hr emission level which would trigger the need to control these emissions as noted in the Federal incinerator guidelines. No free chlorine was detected. The detection limit corresponded to less than 0.001 lb/hr Cl₂.

An attempt was made to perform a chloride balance around boiler operation. Samples were taken of the boiler ash and the fly ash for chloride analysis. Also, as already noted, the chloride content of the stack gas was measured. Summation of the chloride in these outlet streams measured 2.97 lb/hr Cl. A breakdown of this summation shows an average of 0.2 lb/hr Cl as gaseous HCl. The remainder (2.57 lb/hr) is in solid form in either the fly ash or the boiler ash. The boiler feed during the time for which these results were compiled contained about 4 lb/hr Cl.

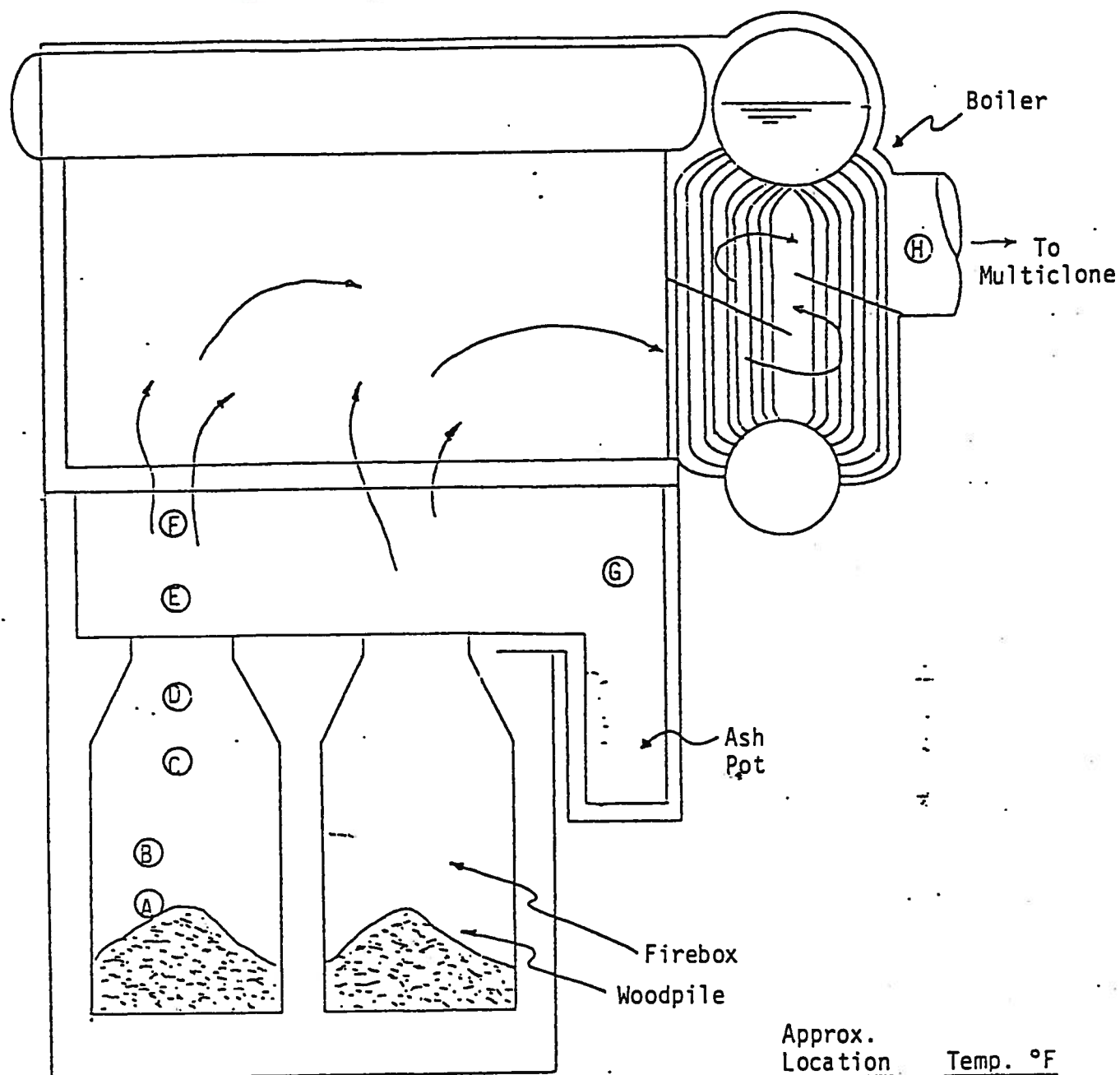
Calculations of the information for the creosote and penta tests are included in Appendix A. Analytical results are enclosed in Appendix C.

Other data obtained during the testing were temperatures of various locations throughout the boiler. Figure 1 locates these points and lists the average temperature obtained for each point.

Conclusions

As indicated by the results of this study, thermal destruction of the penta-in-oil and creosote sludges is a viable means of disposal. The process allows the plant to recover the heating values of the sludges while realizing an operating cost decrease due to the lack of the present land disposal costs. Also, the maximum amount of sludge which could be burned at any one time does not seem apparent by the tests. This limit will have to be set by Mississippi Bureau of Pollution Control.

The stack emissions are in compliance with the State issued permit as modified for the study. Also, as required in the permit, the source passed tests which outline the scope of emissions control as indicated in the Federal guidelines for thermal destruction of sludges by incineration.



Koppers Company, Inc.
Grenada, MS
Boiler Stack Emissions Tests
With Sludges Mixed in Fuel

Figure 1
Temperature Readings

Approx. Location	Temp. °F
A	1325
B	2100
C	2100-2160
D	2200
E	1900-2100
F	1900
G	1600
H	550

TABLE 1

KOPPERS COMPANY, INC.
 GRENADA, MS
 BOILER STACK EMISSIONS TESTS
 WITH SLUDGES MIXED IN FUEL
 CREOSOTE SLUDGE TESTS

Test Conditions	Naphth- alene	Acenaph- thene	Fluorine	Anthracene/ Phenanth- rene	Fluor- anthrene	Pyrene	Chrysene
I. Background (1b/hr)	0.00055	0.00077	0.00015	0.00166	0.00116	0.00077	0.00015
II. 100 lb/hr Sludge							
Components: In (1b/hr)	12	2.8	2.8	9.3	4.1	3.2	2.9
Out							
GR-BS-2 (1b/hr)	0.00104	0.00043	0.00012	0.00063	0.00019	0.00009	0.00018
GR-BS-3 (1b/hr)	0.00045	0.0002	0.00005	0.00024	0.0001	0.00092	0.00000
GR-BS-4 (1b/hr)	0.00062	0.00035	0.00012	0.00047	0.00015	0.00008	0.00000
Average (1b/hr)	0.0007	0.00033	0.000097	0.00045	0.00015	0.00036	0.00002
DRE (%)	99.994	99.988	99.997	99.995	99.996	99.989	99.999
III. 250 lb/hr Sludge							
Components: In (1b/hr)	30	7.0	7.0	23.25	10	8.0	7.25
Out							
GR-BS-5 (1b/hr)	0.00285	0.00008	0.00021	0.00166	0.0008	0.0005	0.00009
GR-BS-6 (1b/hr)	0.00079	0.00038	0.00012	0.00053	0.00025	0.0001	0.00005
GR-BS-7 (1b/hr)	0.00064	0.00039	0.00013	0.00054	0.00034	0.00016	0.00013
Average (1b/hr)	0.00143	0.00028	0.00015	0.00091	0.00046	0.00025	0.00009
DRE (%)	99.995	99.996	99.998	99.996	99.995	99.997	99.999

TABLE 1 (Cont.)

Test Conditions	Naphthalene	Acenaphthene	Fluorine	Anthracene/Phenanthrene	Fluoranthrene	Pyrene	Chrysene
IV. 400 lb/hr Sludge							
Components: In (lb/hr)48	11.2	11.2	11.2	37.2	16.4	12.8	11.6
Out							
GR-BS-8 (1b/hr)	0.00363	0.0022	0.00072	0.00225	0.00066	0.0004	0.00009
GR-BS-9 (1b/hr)	0.00067	0.00034	0.00013	0.00047	0.00013	0.00007	0.00003
GR-BS-10 (1b/hr)	0.00143	0.00058	0.00045	0.00104	0.00024	0.00013	0.00002
Average (1b/hr)	0.00191	0.00104	0.0004	0.00125	0.00034	0.0002	0.00005
DRE (%)	99.996	99.991	99.996	99.997	99.998	99.998	99.999

10.000000
 0.000000
 0.000000

TABLE 2

12

KOPPERS COMPANY, INC.
 GRENADA, MS
 BOILER STACK EMISSIONS TESTS
 WITH SLUDGES MIXED IN FUEL
 PENTA IN OIL TESTS

Test Conditions	Pentachlorophenol	OCDD	HCDD	Hydrogen Chloride	Chlorine
I. 100 lb/hr Sludge					
Components:					
In (lb/hr)	1.55	0.0034	0.0015	1.0 ¹	0.0
Out:					
GR-BS-11 (lb/hr)	0.000099	<1x10 ⁻⁸	<1x10 ⁻⁸	0.044	<0.001
GR-BS-12 (lb/hr)	0.000042	<1x10 ⁻⁸	<1x10 ⁻⁸	0.06	<0.001
GR-BS-13 (lb/hr)	0.000037	<1x10 ⁻⁸	<1x10 ⁻⁸	0.096	<0.001
Average (lb/hr)	0.000059	<1x10 ⁻⁸	<1x10 ⁻⁸	0.067	<0.001
Removal Efficiency (%)	99.996	>99.99	>99.99	-	-
II. 250 lb/hr Sludge					
Components In (lb/hr)	3.9	0.0084	0.0038	2.5 ¹	0.0
Out					
GR-BS-14 (lb/hr)	0.000058	0.000042	<1x10 ⁻⁸	0.043	<0.001
GR-BS-15 (lb/hr)	0.000241	0.00003	<1x10 ⁻⁸	0.101	<0.001
GR-BS-16 (lb/hr)	0.000192	0.000025	<1x10 ⁻⁸	0.207	<0.001
Average (lb/hr)	0.000164	0.000032	<1x10 ⁻⁸	0.117	<0.001
Removal Efficiency (%)	99.996	99.62	>99.99	-	-
III. 400 lb/hr Sludge					
Components:					
In (lb/hr)	6.2	0.0136	0.006	4.0 ¹	0.0
Out					
GR-BS-17 (lb/hr)	0.000366	0.000064	<1x10 ⁻⁸	0.087	<0.001
GR-BS-18 (lb/hr)	0.000140	<1x10 ⁻⁸	<1x10 ⁻⁸	0.316	<0.001
GR-BS-19 (lb/hr)	0.000045	<1x10 ⁻⁸	<1x10 ⁻⁸	0.181	<0.001
Average (lb/hr)	0.000183	0.000021	<1x10 ⁻⁸	0.195	<0.001
Removal Efficiency (%)	99.997	99.85	>99.99	-	-

¹Based upon calculation of chloride contents of penta.



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

RECEIVED

SEP 30 1991

P 736 720 142
Certified Mail
Return Receipt Requested

DEPARTMENT OF
ENVIRONMENTAL QUALITY

September 25, 1991

Executive Director
Mississippi Department of Natural
Resources
P. O. Box 10385
Jackson, Mississippi 39209

Re: 1991 Financial Assurance

RECEIVED BY DKP
DATE 10/10/91
COMMENT SENT Copy to EPA
Responded w/ letter stating
that extension would not be granted
10/23/91

Dear Sir or Madam:

As you know, Beazer East, Inc. is required to submit revised financial assurance information to you not later than ninety (90) days from the end of Beazer's fiscal year, which ended on June 30, 1991. That means that current information is due on or before September 28, 1991. In the past, an audited balance sheet and notes thereto ("the financial statement") from Beazer East, Inc. has represented proof that Beazer is financially able to perform the necessary and required environmental tasks.

This year, on September 16, 1991, as you may have read in the financial pages of the newspaper, it was announced that Hanson PLC, a corporation headquartered in the United Kingdom, and with substantial assets and operations within the United States, announced its intention to acquire 100 % of the outstanding capital shares of stock of Beazer PLC, the ultimate parent company of Beazer East, Inc. Although that transaction has yet to come to fruition, certain events upon which our independent Certified Public Accountants were relying in order to give their opinion may not occur if the acquisition is completed. Similarly, other events, such as the acquisition itself, which have not been taken into consideration by the Accountants may occur. Therefore, Beazer will not presently be able to provide you with an audited financial statement which accurately and completely reflects these circumstances on or before September 28, 1991. Please rest assured that Beazer is doing everything possible to see that you receive the necessary information as soon as possible. Beazer is therefore requesting an extension of time within which to submit the audited financial statement, for a period of time not to exceed ninety (90) days from September 28, 1991.

September 25, 1991

Executive Director
Mississippi Department of Natural
Resources
P. O. Box 10385
Jackson, Mississippi 39209

Re: 1991 Financial Assurance

Page 2

Your patience in this matter is much appreciated. As always, if you have any questions, please do not hesitate to call.

Sincerely yours,



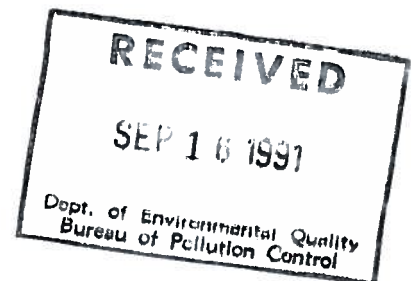
Russell S. Vorpe
Environmental Department
Regulatory Compliance Section

2822 O'Neal Lane
Post Office Box 66317
Baton Rouge, Louisiana 70896
(504) 751-1873
FAX (504) 753-3616

Woodward-Clyde Consultants

September 13, 1991

Ms. Elizabeth Ketcham
U. S. EPA and Region IV
RCRA and Federal Facilities Branch
2nd Floor
345 Courtland Street
Atlanta, Georgia 30365



Re: Koppers Industries, Inc.
Tie Plant, Mississippi
Public Notice
File 91B432C

Dear Ms. Ketcham:

Enclosed please find a copy of the public notice as it appeared in Tie Plant's local newspaper and proof of publication signed by the newspaper editor. This public notice was published to comply with the requirements of the Boiler and Industrial Furnace (BIF) regulations. On August 20, 1991, Woodward-Clyde Consultants had included a copy of this public notice in the BIF precompliance certification submitted to the U. S. EPA Region IV on behalf of Koppers Industries.

Very truly yours,

Dudley J. Deville, P. E.

Anaxis G. Duhon

AGD:vv
Enclosure

cc: Jerry Banks, Mississippi Bureau of Pollution Control (enclosure)
J. D. Clayton, Koppers Industries
Stephen Smith, Koppers Industries

91B432CB.LTR LMS

Consulting Engineers, Geologists
and Environmental Scientists

Offices in Other Principal Cities



**PUBLIC NOTICE
NOTICE OF CERTIFICATION
OF PRECOMPLIANCE WITH HAZARDOUS
WASTE BURNING REQUIREMENTS
OF 40 CFR 266.103(b)**

This notice is to inform the public of the following facility's intent to comply with the U. S. Environmental Protection Agency (EPA) regulations for combustion of hazardous waste in boilers and industrial furnaces (BIF's).

GENERAL FACILITY INFORMATION:

Facility Owner/Operator: Koppers Industries, Inc.
Address: Tie Plant Road, Tie Plant, Mississippi 38960

FACILITY LOCATION: Tie Plant Road, Tie Plant, Mississippi 38960

DATE THAT PRECOMPLIANCE CERTIFICATION WAS SUBMITTED TO EPA: August 21, 1991

DESCRIPTION OF BIF REGULATORY PROCEDURES: EPA has promulgated standards under Subpart H of 40 CFR Part 266 that regulate the combustion of hazardous waste in BIFs. These standards require BIFs to comply with emissions standards during a period of "interim status" prior to obtaining a final Resource Conservation and Recovery Act operating permit. Limits on operating conditions during the interim status ensure that the facility is in compliance with emissions standard for hazardous metals, hydrogen chloride, free chlorine, particulate matter, and hazardous organic compounds. The interim status rules require that owners and operators of BIFs combusting hazardous wastes must submit, by August 21, 1991, a certification of precompliance documents based on best engineering judgment. By August 21, 1992, owners and operators must submit a certification of compliance documenting that stack testing has confirmed compliance with the emissions standards. Additional information on these regulatory requirements is provided in Subpart H of 40 CFR Part 266.

TYPES OF HAZARDOUS WASTES BURNED:

Koppers Industries, Inc.'s, wood preserving facility in Tie Plant, Mississippi, includes a wood-burning steam boiler. Periodically (approximately 30 percent of the time), wood preserving plant waste generated at the Koppers Tie Plant facility, and at other similar Koppers facilities, are used as supplementary fuel to fire the boiler. The primary fuel used to fire the boiler is wood chips. The normal feed rate of wood chips is approximately 4,000 pounds per hour. Supplementary waste fuel, when used, is fed at a maximum rate of 800 pounds per hour.

The wood preserving plant waste used as supplementary fuel includes EPA listed waste code Nos. F032 and F034, which were classified as hazardous waste by EPA effective June 8, 1991. EPA waste codes K-001 and U051 will also be burned as supplementary fuel.

These wood preserving plant wastes consist of treated timbers, preservative drippage, discarded spent formulations from wood preserving processes that use preservative formulation and non-preserved materials, and other waste materials.

TYPE OF COMBUSTION DEVICE: The facility uses two regulated industrial furnaces, which is a 37.8 million BTU/hr. wood-fired, water-tube boiler. The steam that is produced is used in the facility's wood treating process. The boiler is equipped with a cyclone-type dust collector to control particulate emissions below 0.08 grains per dry standard cubic foot.

FUEL AND FEEDSTOCKS TO BE FIRED OTHER THAN HAZARDOUS WASTES: Feedstocks and fuels include nonhazardous wood chips. The fire is usually started with wood but occasionally diesel fuel may be added to the wood chips. Once the fire is started, it is sustained on wood only.

BASIS FOR PRECOMPLIANCE CERTIFICATION: The efficiency of the unit's air pollution control system was obtained by using manufacturer's data for the dust collector system. It has been determined that the emissions of particulate matter are below the EPA limit of 0.08 grains per dry standard cubic foot by emission testing. Further, site-specific air dispersion modeling was conducted to determine the maximum annual average ground-level concentrations of metals, HCl and Cl₂ surrounding the facility. The projected ground-level concentrations of all pollutants at the maximum waste feed rates are lower than the levels established by EPA for the protection of public health.

LOCATION OF THE FACILITY'S OPERATING RECORD: The facility's operating record can be viewed and copied at the following locations:

- Koppers Industries, Inc.
Tie Plant Road
Tie Plant, Mississippi 38960
- Hazardous Waste Division
Bureau of Pollution Control
Mississippi Department of Environmental Quality
Post Office Box 10385
Jackson, Mississippi 39209

FACILITY MAILING LIST: A mailing list of parties interested in receiving future information related to the facility's regulatory compliance activities has been established. To be included on this mailing list, contact the EPA Hazardous Waste Division identified below.

REGIONAL EPA HAZARDOUS WASTE DIVISION: Additional information on EPA's BIF regulatory program can be obtained by contacting:

Hazardous Waste Management Division
EPA Region IV
345 Courland Street, N.E.
Atlanta, Georgia 30365
8/22/91

The Daily Sentinel

Proof of Publication

STATE OF MISSISSIPPI COUNTY OF GRENADA

Before me, the undersigned authority in and for the County aforesaid, this day personally appeared

Jimmy J. Wolfe

who, being duly sworn, states on oath that he is the

Managing Editor

of The Daily Sentinel-Star, a newspaper published in the city of state and county aforesaid, with a general circulation in said county which has been published for a period of more than one year, a publication of the notice, a copy of which is hereto attached, has in said paper times, at weekly intervals and in the entire issue of said newspaper for the numbers and dates hereinafter to-wit:

- Vol. 137 No. 32 on the 22 day of 08, 1991
- Vol. No. on the day of 198.....
- Vol. No. on the day of 198.....
- Vol. No. on the day of 198.....
- Vol. No. on the day of 198.....
- Vol. No. on the day of 198.....
- Vol. No. on the day of 198.....
- Vol. No. on the day of 198.....

Jimmy J. Wolfe

Sworn to and subscribed before me, this

August 8, 1991
Kathryn McConnell Rober

My Commission Expires Sept. 8, 1992

(SEAL)



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
RAY MABUS
GOVERNOR

September 5, 1991

Mr. J. D. Clayton, Plant Manager
Koppers Industries, Inc.
P. O. Box 160
Tie Plant, MS 38960

Re: BIF Precompliance Certification

Dear Mr. Clayton:

The following comments on the BIF Precompliance Certification and Part A submittal require correction and/or clarification:

(A) Part A:

- (1) Section XII, Lines 3 and 4 - What is the unit of measure (yd³ or m³)?
- (2) Section XII, Line 4 - What is the unit of measure and number of units?
- (3) Section XII, Line 2 - The process design capacity is given as less than 1 acre while the previous unit capacity is 0.75 acres. What is the exact process design capacity?
- (4) Section XII, Line 5 - How many drums, barrells, etc. are to be stored in this unit?
- (5) Section XIII - The given treatment process design capacity is 800 lbs/hour; however, Form 2 of the certification indicates a waste feed of some 1900 lbs/hour! Please clarify.

(B) Precompliance Certification:

- (1) Part 266.106(d)(1) states that compliance testing be done to determine the emission rate of each metal.

Mr. J. D. Clayton
September 5, 1991
Page 2

- (2) Please provide a copy of the HCL stack test along with a justification that the method used is valid when compared to the HCL method referenced in the BIF Regulations.
- (3) Part 266.122(b) basically puts forth the staff's opinion concerning a "closure" of the boiler to allow the residues to be disposed of as non-hazardous waste. The waste-feed mechanism, boiler, and all equipment coming in contact with the hazardous waste and its residues must be decontaminated and proven that no toxic constituents attributable to the hazardous waste remain at concentrations higher than found when burning non-hazardous waste or that no toxic constituents attributable to the hazardous waste are above health based limits. This also applies to the residues. Since the hazardous waste burned is a listed waste, the TC analysis is useless for a "closure" type procedure.

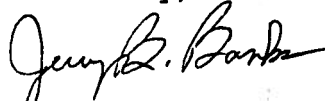
(C) Other:

- (1) What type sampling and analysis plan will be instituted to assure that HCL, Cl₂ and metal feed rates do not exceed the allowable? section 265.13 requires a written waste analysis plan that must be submitted to the Office of Pollution Control for review and concurrence.
- (2) Provide documentation of compliance with interim status requirements of 266.103(a)(4); specifically,
 - (a) waste analysis plan
 - (b) security
 - (c) general inspection requirements
 - (d) personnel training
 - (e) preparedness and prevention "plan"
 - (f) contingency plan & emergency procedures
 - (g) manifesting, record keeping, and reporting
 - (h) closure cost estimate
 - (i) financial assurance for closure
 - (j) financial responsibility for bodily injury and property damage to third parties by accidents.
 - (k) air emission standards for equipment leaks
 - (l) use & management of containers
- (3) Provide a closure plan by February 21, 1992.

Mr. J. D. Clayton
September 5, 1991
Page 3

Please provide a written response by September 27, 1991. If you have any questions please advise.

Sincerely,



Jerry B. Banks
Hazardous Waste Division

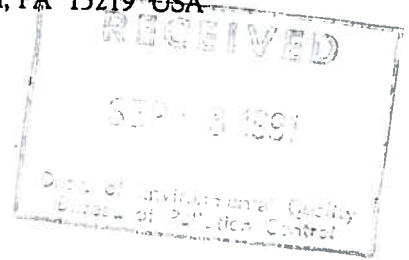
JBB:lfc

cc: Beth Antley, EPA
Steve Smith, Koppers Industries, Inc.
Dudley J. Deville, P.E.

Planned



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219-USA



August 30, 1991

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

Mr. James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Koppers Industries, Inc.
Grenada Tie Plant, Mississippi
EPA I.D.# MSD 007 027 543

Dear Mr. Scarbrough:

As explained in a phone conversation between myself and Ms. Pat Anderson of your office on August 21, 1991, Beazer East, Inc. (BEI) continues to experience difficulties in obtaining legal access to property owned by Mr. Wayne E. Carlin of Stryker, Ohio. Mr. Carlin owns property in Tie Plant, Mississippi, adjacent to Koppers Industries, Inc.'s wood treating plant. Access to this property is needed to fulfill the requirements of the approved RFI Work Plan submitted pursuant to the RCRA permit for the above-mentioned site. At the present time, BEI anticipates completing all onsite work by September 11, 1991, which is the projected date for completion of field work as per the work plan schedule. The inability to obtain access from Mr. Carlin will prevent BEI from installing and sampling five offsite monitoring wells by this date.

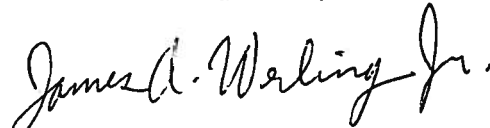
BEI has diligently attempted to resolve the access problem since the initial access agreement was forwarded to Mr. Carlin in 1989. On April 8, 1991, a revised access agreement addressing Mr. Carlin's initial concerns was forwarded. No response was received, and on June 7, 1991, BEI notified your office by letter of our previous efforts and continuing problems with access negotiations. Since that time, we have, through correspondence, engaged in several discussions with Mr. Carlin's attorney and have been unable to come to terms on several issues (see attached). This letter formalizes BEI's declaration of force majeure effecting the offsite work specified in the work plan. In addition, BEI will not be able to meet the submittal date for the RFI report unless information from these wells is omitted.

Mr. James H. Scarbrough, P.E., Chief
August 30, 1991
Page 2

Unless we hear otherwise from you, BEI will push forward with remaining field work and sample analysis per the work plan schedule, with the intention of preparing an RFI report without the offsite data. The access problem constitutes an ongoing force majeure event. BEI will notify you in writing when the force majeure event is over and submit a new schedule for completion of the offsite field work on Mr. Carlin's property.

Please call if you have any questions.

Very truly yours,



James A. Werling, Jr.
Program Manager - Environmental Services

JAW/dlk

Enclosures

cc: J. Mark Hansen
R. G. Hamilton
J. D. Clayton (KII-Grenada)
J. Batchelder (KII)
P. Anderson (EPA)
D. Peacock (MSDNR)



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA
TEL: 412 227-2430 FAX: 412 227-2042

LAW DEPARTMENT

Jill M. Blundon
General Counsel
Thomas Burgunder
Thomas F. Reid
George Carroll
Mary Dombrowski Wright
Billie Schrecker Nolan
William F. Giarla
Mary C. Fairley
J. Mark Hansen
Donna J. Morris

August 14, 1991

VIA FACSIMILE

John S. Shaffer, Esquire
Newcomer, Shaffer, Bird & Spangler
Corner of Lynn & Maple Streets
Bryan, Ohio 43506-1691

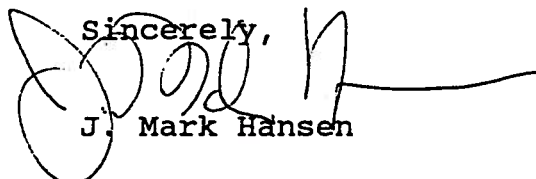
Dear Mr. Shaffer:

I am in receipt of your correspondence of August 14, 1991. Quite frankly, Beazer is disappointed in Mr. Carlin's response. As I have explained, we desire only your permission to enter upon the property for a very limited purpose. Other than the installation and maintenance of monitoring wells, Beazer has no other reason to cross the boundary line. And Beazer certainly has no business need to purchase Mr. Carlin's property. We thought that in the interest of doing the correct and responsible thing, i.e. the environmental investigation and possible remediation of an old industrial site, Mr. Carlin would gladly cooperate. Apparently that is not the case.

Because of the failure to obtain access from Mr. Carlin, portions of the RCRA Facility Investigation (RFI) cannot be completed, and Beazer has been forced to declare a force majeure event, meaning that Beazer has notified the regulating agencies that it cannot comply with the schedules contained in the RFI Work Plan. Unless we hear from you immediately concerning Mr. Carlin's willingness to enter into an access agreement, Beazer will formally request that Mississippi Department of Environmental Quality and/or USEPA implement their statutory authority to gain access to Mr. Carlin's property.

I look forward to hearing from you. If you have questions or comments please do not hesitate to call me.

Sincerely,



J. Mark Hansen

cc: James Werling, Beazer East, Inc.
Dave Peacock, MDEQ
James Scarborough, USEPA Region IV



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA
TEL: 412 227-2430 FAX: 412 227-2042

LAW DEPARTMENT

Jill M. Blundon
General Counsel
Thomas Burgunder
Thomas F. Reid
George Carroll
Mary Dombrowski Wright
Billie Schrecker Nolan
William F. Giarla
Mary C. Fairley
J. Mark Hansen
Donna J. Morris

July 31, 1991

VIA FACSIMILE

John S. Shaffer, Esquire
Newcomer, Shaffer, Bird & Spangler
Corner of Lynn & Maple Streets
Bryan, Ohio 43506-1691

RE: Wayne E. and Lucille Carlin
Grenada, Mississippi Property

Dear Mr. Shaffer:

I am in receipt of your correspondence dated July 31, 1991. You are correct in your assertion that I did not receive, for whatever reason, your prior letter. The purpose of this letter is to respond to your comments, and to propose some additional points.

First, I will address your comments describing the instrument as an easement. As you know the owner of an easement to real property possesses an "ownership" interest in the real property itself. Hence, the creation of an easement interest is usually (though not always) accomplished through a written instrument which is duly recorded, and supported by more than nominal consideration. Beazer has no ownership interest in Mr. Carlin's property and desires none. We are instead looking for a permissive use of his property (the installation of wells), along with the ability to enter upon his property, with Mr. Carlin's prior consent, for the sole purpose of maintaining and servicing same in accordance with work plans which have been approved by the regulating authorities, or are otherwise required by the Resource Conservation and Recovery Act (RCRA) or other applicable federal or state statutes and/or regulations. While I do not purport to practice real property law, it seems that the permission that Beazer desires is more in the form of a license than an easement. I would very much appreciate your thoughts on the matter.

Second, as to the possibility of Mr. Carlin taking samples and having those samples tested independently, I will respond as follows. I am assuming that you are referring to groundwater samples, not soil samples, because Beazer's work plan does not

John S. Shaffer, Esquire

July 31, 1991

2.

anticipate or propose soil sampling on Mr. Carlin's property. Anytime that Beazer conducts a sampling event, both EPA and Mr. Carlin have the right to take "split samples," meaning samples taken from the same water drawn from the wells. These samples can be evaluated independently if desired. Beazer will not, however, reimburse or otherwise pay for the costs associated with the independent analysis. There are more than enough safeguards built into the system established in the agency-approved work plan to ensure that honest and technically correct results are derived. First, the installation of the wells themselves is subject to exacting engineering specifications and EPA oversight, as is the procedures for extracting samples from those wells. Second, the laboratories which analyze the samples must be approved in advance by EPA, must follow exactly certain protocols in the analysis of samples, and must adhere rigidly to EPA approved Quality Assurance/Quality Control procedures. Finally, both Beazer and the laboratory must certify that proper procedures were followed in the extraction, handling and analysis of the samples. Providing EPA with altered or fraudulent sampling information will subject the offending party to stiff civil penalties and/or criminal prosecution.

As to the scope of information which Mr. Carlin desires to have forwarded to him, Beazer will agree to provide him with each and every document which, according to RCRA must be made available for public inspection. These documents are currently held in a public repository at the Grenada Public Library. Beazer is willing, however, to forward a copy of such documents, as they become available, to Mr. Carlin.

Finally, I will address your request for a date certain for the termination of the agreement. Normally it is impossible to estimate the duration of an environmental investigation and remediation, if needed. However, in the spirit of compromise Beazer is willing to agree to terminate to agreement at such time that the monitoring wells and other exploratory borings are no longer needed, or upon the expiration of 15 years, whichever occurs first.

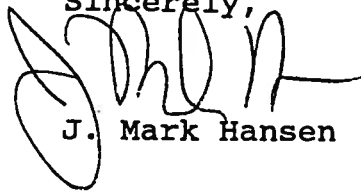
Beazer is under intense pressure from the Mississippi Department of Environmental Quality (MDEQ) and EPA to obtain access from Mr. Carlin. In fact, if agreement is not reached in the very near future, the regulatory agencies may use their statutory powers to obtain access from Mr. Carlin. Such an eventuality causes Beazer problems from a scheduling standpoint, and would

John S. Shaffer, Esquire
July 31, 1991
3.

probably not be a pleasant experience for Mr. Carlin. Because it is in both our interests to proceed expeditiously with the environmental work at the Grenada site, I urge Mr. Carlin to act promptly to execute our access agreement so that Beazer may get on with its work.

I look forward to hearing from you. Please do not hesitate to call me with questions or comments.

Sincerely,

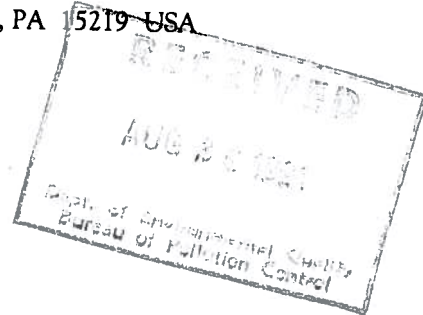
A handwritten signature in dark ink, appearing to read 'J. Mark Hansen', written over the typed name.

J. Mark Hansen

cc: James Werling



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219-USA



August 22, 1991

Mr. David Pentecost
State of Mississippi
Department of Environmental Quality
Hazardous Waste Division
P.O. Box 10386
Jackson, Mississippi 39289-0385

Re: Comprehensive Groundwater
Monitoring Inspection
Koppers Industries, Inc.
Grenada, Mississippi

Dear Mr. Pentecost:

In July 1991, Beazer East, Inc. received a Comprehensive Monitoring Evaluation (CME) report from the Mississippi Department of Environmental Quality (MSDEQ) related to an inspection conducted on December 11, 1990, at the above-referenced facility. No violations were observed during the inspection. However, two issues were addressed in the cover letter accompanying the CME report, and Beazer offers the following response:

- 1) On the date of the inspection, monitoring well R-6 was noted to be damaged. MSDEQ has indicated that the well should be properly plugged and abandoned to prevent possible migration of contaminants to the groundwater. Preliminary assessment of the damage to the well indicates that repairs to the well may be possible by plugging and abandoning the well. Beazer's consultant will be in the field during the month of August and at that time a hydrogeologist will determine the condition of well R-6. If the well can be repaired, the necessary repairs will be made. If the well is damaged beyond repair, then the well will be properly abandoned. Any repairs or abandonment will be documented by the hydrogeologist.

DETERMINE IF
STATISTICAL ANALYSIS
AS PROPOSED
IS SATISFACTORY

- 2) MSDEQ has requested that during groundwater sampling events both total and dissolved metals be analyzed. It is assumed that this is referring to the metals chromium and mercury which were added to the surface impoundment monitoring program per modifications to the facility's RCRA Permit (No. 88-543-01) on February 13,

Mr. David Pentecost
August 22, 1991
Page 2

1990. Beazer will add total chromium and mercury to the closed surface impoundment groundwater monitoring program beginning with the fourth quarter 1991. Currently, dissolved chromium and mercury analysis are being performed. For statistical evaluations dissolved chromium and mercury data will be used since dissolved metals are more indicative of the mobility of these constituents in the groundwater.

If you have any questions concerning the above response, please call me at (412) 227-2189.

Sincerely,



James A. Werling, Jr.
Program Manager - Environmental Services

JAW/dlk

cc: J. Mark Hansen (BEI)
D. King (KER)
N. Schulz (D&M)



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA
TEL: 412 227-2430 FAX: 412 227-2042

LAW DEPARTMENT

Jill M. Blundon
General Counsel
Thomas Burgunder
Thomas F. Reid
George Carroll
Mary Dombrowski Wright
Billie Schrecker Nolan
William F. Giarla
Mary C. Fairley
J. Mark Hansen
Donna J. Morris

August 14, 1991

VIA FACSIMILE

John S. Shaffer, Esquire
Newcomer, Shaffer, Bird & Spangler
Corner of Lynn & Maple Streets
Bryan, Ohio 43506-1691



Dear Mr. Shaffer:

I am in receipt of your correspondence of August 14, 1991. Quite frankly, Beazer is disappointed in Mr. Carlin's response. As I have explained, we desire only your permission to enter upon the property for a very limited purpose. Other than the installation and maintenance of monitoring wells, Beazer has no other reason to cross the boundary line. And Beazer certainly has no business need to purchase Mr. Carlin's property. We thought that in the interest of doing the correct and responsible thing, i.e. the environmental investigation and possible remediation of an old industrial site, Mr. Carlin would gladly cooperate. Apparently that is not the case.

Because of the failure to obtain access from Mr. Carlin, portions of the RCRA Facility Investigation (RFI) cannot be completed, and Beazer has been forced to declare a force majeure event, meaning that Beazer has notified the regulating agencies that it cannot comply with the schedules contained in the RFI Work Plan. Unless we hear from you immediately concerning Mr. Carlin's willingness to enter into an access agreement, Beazer will formally request that Mississippi Department of Environmental Quality and/or USEPA implement their statutory authority to gain access to Mr. Carlin's property.

I look forward to hearing from you. If you have questions or comments please do not hesitate to call me.

Sincerely,

J. Mark Hansen

cc: James Werling, Beazer East, Inc.
Dave Peacock, MDEQ
James Scarborough, USEPA Region IV

2822 O'Neal Lane
Post Office Box 66317
Baton Rouge, Louisiana 70896
(504) 751-1873
FAX (504) 753-3616

Woodward-Clyde Consultants



August 20, 1991

Ms. Elizabeth Ketcham
U. S. EPA Region IV
RCRA and Federal Facilities Branch
2nd Floor
345 Courtland Street
Atlanta, Georgia 30365

Re: Koppers Industries, Inc.
Grenada, Mississippi, Plant
BIF Precompliance
Certification and Part A Application
File 91B432C


Dear Ms. Ketcham:

On behalf of our client, Koppers Industries, Inc., we are submitting two copies of the Certification of Precompliance with the Boilers and Industrial Furnaces (BIF) Regulations, and the revised Part A Application, both applicable to the Koppers Grenada, Mississippi, facility.

This is being submitted in compliance with the requirement of the BIF Regulations for facilities that burn hazardous waste.

Very truly yours,


Dudley J. Deville, P. E.


Bharat R. Contractor, P. E.

DJD:jc
Enclosure

cc: Mr. Jerry Banks, Mississippi Bureau of Pollution Control (1 copy)
Mr. Steve Smith, Koppers, Pittsburgh, Pennsylvania (4 copies)
Mr. J. D. Clayton, Koppers, Grenada Plant (2 copies)
BIF432C.CVL RPT10

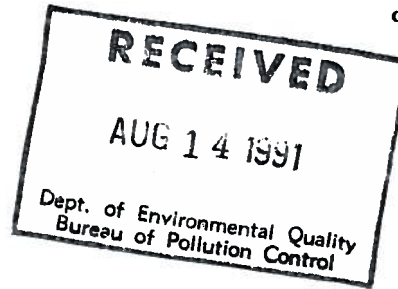
Consulting Engineers, Geologists
and Environmental Scientists

Offices in Other Principal Cities



NEWCOMER, SHAFFER, BIRD & SPANGLER
LAWYERS

WAYNE E. SHAFFER
DAVID C. NEWCOMER
JOHN S. SHAFFER
STEVEN R. BIRD
MICHAEL W. SPANGLER
MICHAEL A. SHAFFER



CORNER OF LYNN & MAPLE STREETS
BRYAN, OHIO 43506-1691
TELEPHONE: 636-3196
FAX: 636-0867
AREA CODE 419

ARTHUR S. NEWCOMER
J. ROBERT GEESEY
OF COUNSEL
JAMES A. HUTTON
1939-1984

August 12, 1991

SENT BY FAX

Mr. David Peacock
Mississippi Department of Natural Resources
Bureau of Pollution Control
2380 Hy 80 W
Jackson, Mississippi 39204

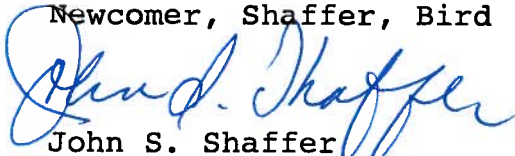
Re: Wayne E. and Lucille B. Carlin

Dear Mr. Peacock:

At Mr. Carlin's request, we are enclosing herewith a copy of the letter which we received from Beazer in response to our letter of July 31, 1991.

Very truly yours,

Newcomer, Shaffer, Bird & Spangler


John S. Shaffer
SC
Enclosure



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA
TEL: 412 227-2430 FAX: 412 227-2042

LAW DEPARTMENT

Jill M. Blundon
General Counsel
Thomas Burgunder
Thomas F. Reid
George Carroll
Mary Dombrowski Wright
Billie Schrecker Nolan
William F. Giarla
Mary C. Fairley
J. Mark Hansen
Donna J. Morris

July 31, 1991

VIA FACSIMILE

John S. Shaffer, Esquire
Newcomer, Shaffer, Bird & Spangler
Corner of Lynn & Maple Streets
Bryan, Ohio 43506-1691

RE: Wayne E. and Lucille Carlin
Grenada, Mississippi Property

Dear Mr. Shaffer:

I am in receipt of your correspondence dated July 31, 1991. You are correct in your assertion that I did not receive, for whatever reason, your prior letter. The purpose of this letter is to respond to your comments, and to propose some additional points.

First, I will address your comments describing the instrument as an easement. As you know the owner of an easement to real property possesses an "ownership" interest in the real property itself. Hence, the creation of an easement interest is usually (though not always) accomplished through a written instrument which is duly recorded, and supported by more than nominal consideration. Beazer has no ownership interest in Mr. Carlin's property and desires none. We are instead looking for a permissive use of his property (the installation of wells), along with the ability to enter upon his property, with Mr. Carlin's prior consent, for the sole purpose of maintaining and servicing same in accordance with work plans which have been approved by the regulating authorities, or are otherwise required by the Resource Conservation and Recovery Act (RCRA) or other applicable federal or state statutes and/or regulations. While I do not purport to practice real property law, it seems that the permission that Beazer desires is more in the form of a license than an easement. I would very much appreciate your thoughts on the matter.

Second, as to the possibility of Mr. Carlin taking samples and having those samples tested independently, I will respond as follows. I am assuming that you are referring to groundwater samples, not soil samples, because Beazer's work plan does not

John S. Shaffer, Esquire

July 31, 1991

2.

anticipate or propose soil sampling on Mr. Carlin's property. Anytime that Beazer conducts a sampling event, both EPA and Mr. Carlin have the right to take "split samples," meaning samples taken from the same water drawn from the wells. These samples can be evaluated independently if desired. Beazer will not, however, reimburse or otherwise pay for the costs associated with the independent analysis. There are more than enough safeguards built into the system established in the agency-approved work plan to ensure that honest and technically correct results are derived. First, the installation of the wells themselves is subject to exacting engineering specifications and EPA oversight, as is the procedures for extracting samples from those wells. Second, the laboratories which analyze the samples must be approved in advance by EPA, must follow exactly certain protocols in the analysis of samples, and must adhere rigidly to EPA approved Quality Assurance/Quality Control procedures. Finally, both Beazer and the laboratory must certify that proper procedures were followed in the extraction, handling and analysis of the samples. Providing EPA with altered or fraudulent sampling information will subject the offending party to stiff civil penalties and/or criminal prosecution.

As to the scope of information which Mr. Carlin desires to have forwarded to him, Beazer will agree to provide him with each and every document which, according to RCRA must be made available for public inspection. These documents are currently held in a public repository at the Grenada Public Library. Beazer is willing, however, to forward a copy of such documents, as they become available, to Mr. Carlin.

Finally, I will address your request for a date certain for the termination of the agreement. Normally it is impossible to estimate the duration of an environmental investigation and remediation, if needed. However, in the spirit of compromise Beazer is willing to agree to terminate to agreement at such time that the monitoring wells and other exploratory borings are no longer needed, or upon the expiration of 15 years, whichever occurs first.

Beazer is under intense pressure from the Mississippi Department of Environmental Quality (MDEQ) and EPA to obtain access from Mr. Carlin. In fact, if agreement is not reached in the very near future, the regulatory agencies may use their statutory powers to obtain access from Mr. Carlin. Such an eventuality causes Beazer problems from a scheduling standpoint, and would

John S. Shaffer, Esquire

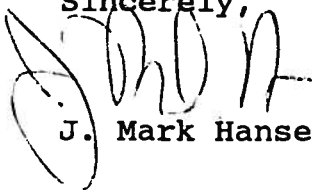
July 31, 1991

3.

probably not be a pleasant experience for Mr. Carlin. Because it is in both our interests to proceed expeditiously with the environmental work at the Grenada site, I urge Mr. Carlin to act promptly to execute our access agreement so that Beazer may get on with its work.

I look forward to hearing from you. Please do not hesitate to call me with questions or comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Mark Hansen", is written over the typed name.

J. Mark Hansen

cc: James Werling

opens
compliance

08/13/91

16:12

U.S. E.P.A. - D.

001

WASTE MANAGEMENT DIVISION
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GA 30365

FACSIMILE TRANSMISSION SHEET
(Please Number All Pages)

DATE: 8/13/91 NO. OF PAGES (Include Cover Sheet) 5

TO: JERRY BANKS TO FAX NUMBER: (601) 354-6612

ADDRESS: RCRA TO PHONE NUMBER: (601) 961-5221

FROM FTS FAX NUMBER: 257-5205

COMMERCIAL FAX NO: 404-347-5205

IF THE FOLLOWING MESSAGE IS RECEIVED POORLY, PLEASE CALL WISSIE WETCHA
IN OUR OFFICE AT FTS 257-3433 OR COMMERCIAL (404) 347-3433

SPECIAL NOTES OR INSTRUCTIONS

ROC FROM KOPPERS & WOODWARD CLYDE
TO DISCUSS BIF ISSUES AGAIN.
HOPEFULLY THIS IS ALL RESOLVED

THE FAX, MAN,
AND NOTHING BUT
THE FAX.



RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALLS <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	FROM:		DATE
Elizabeth Ketcham, WES	Dudley Deville of Woodward Anaxia Duhon Clyde		8/12/91 11:30A
SUBJECT			
Koppers Grenada, MS - Interim Status under the BIF Rule MSD 007 027 543			
SUMMARY OF COMMUNICATION			
OVERALL COMMUNICATIONS ON OR ABOUT ^{7/16} 4/23, 7/30, 8/12/91			
<p>IN GENERAL, KOPPERS HAS BEEN BURNING WASTE IN THEIR WOOD BURNING BOILER (CAMPAIGN BURNING 2MPS ON, 4MPS OFF).</p> <p>KOPPERS STOPPED BURNING THIS WASTE ON JUNE 5 BECAUSE THE WASTE BECAME HAZARDOUS (FO32 & FO34) ON JUNE 6 (EFFECTIVE DATE OF THE WOOD PRESERVING RULE)</p> <p>THEY INITIALLY WANTED US TO REVIEW AND APPROVE AN "ASH DISPOSAL PLAN" WHICH WOULD BE IMPLEMENTED BETWEEN BURNING HAZARDOUS & SOLID WASTE SO THAT THEY COULD MINIMIZE THE AMOUNT OF ASH WHICH WOULD FALL UNDER RCRA FOR THE "DERIVED FROM" RULE - I.E. MINIMIZE DISPOSAL COSTS. - THEY WANTED THIS PLAN APPROVED PRIOR TO THE EFFECTIVE DATE OF THE BIF RULE (AUG 21, 1991), SO THAT THEY COULD DECIDE IF THEY WANTED TO SUBMIT A MODIFIED PART A & PRECOMPLIANCE CERTIFICATION & GET INTERIM STATUS UNDER THE BIF RULE</p> <p>WE REPLIED THAT WE WOULD ACCEPT ANY PLANS THEY WANTED TO SUBMIT, AND THAT INTERIM CLEANUPS HAVE BEEN APPROVED FOR OTHER FACILITIES, BUT THAT WE WOULD NOT REVIEW IT BEFORE AUG 21, 1991 & THAT THEY WOULD HAVE TO MAKE THEIR OWN DECISIONS.</p> <p>WE ALSO TOLD THEM THAT FO32 WASTE COULD NOT BE BURNED DURING IS. BECAUSE 260 APPX III HAS IT LISTED FOR DIOXINS AND 260.103(a)(3) PROHIBITS BURNING HAZARDOUS WASTE LISTED FOR DIOXIN OR DERIVED FROM... DIOXIN-LISTED WASTES [FO20-23 & FO26-27]" IN A BIF DURING INTERIM STATUS.</p> <p>IN ADDITION, FO34 WASTE WAS NOT CONSIDERED TO BE HAZARDOUS UNTIL THE STATE ADOPTS AND BECOMES AUTHORIZED FOR FO34 (non-HSWA LISTING).</p> <p>THEY DISAGREE WITH FO32 PROHIBITION BECAUSE FO32 IS CONSIDERED "TOXIC" WHEREAS THE PREVIOUSLY LISTED DIOXIN WASTES ARE "ACUTELY HAZARDOUS". THIS ISSUE HAS NOT BEEN COMPLETELY RESOLVED (SEE ATTACHED FROM B. ANTLEY)</p>			
- OVER -			
INFORMATION COPIES			
TO: FILE DONALDSON ANDERSON B. WILLIAMS MCCURRY			

RECENT DEVELOPMENTS:

KETTERER HAS DECIDED TO GO AHEAD AND SUBMIT AMENDED PART A & PRECOMPLIANCE CERT. AS A PROTECTIVE FILER.

ISSUES: ① SINCE THEY STOPPED BURNING WASTE BEFORE IT BECAME LISTED, DO THEY NEED TO RE-BURN THE WASTE TO MEET THE DEFINITION OF "IN EXISTENCE"? BEFORE AUG 21

② IF THEY DO BURN BEFORE AUG 21, WILL THEIR ASH BE HAZARDOUS? YES - IT WILL BE HAZARDOUS UNTIL THE UNIT GETS CLEANED OUT.

③ IF THEY HAVE TO BURN BEFORE AUG 21, CAN EPA APPROVE THEIR "ASH DISPOSAL PLAN" BY THIS TIME? NO

ISSUE ① WAS DISCUSSED WITH BETH ANTLEY, AND IT WAS DECIDED THAT THE FACILITY COULD BE CONSIDERED TO BE 'IN EXISTENCE' ~~DUE TO~~ BASED ON THE BIF RULE AND THE WOODTREATING RULE BECAUSE THE BURNING OF WASTE IS CONSISTENT WITH ^{"ACT"} FACILITY OPERATION, AND IT WOULD BE INCONSISTENT TO REQUIRE BURNING OF A PROHIBITED WASTE TO GAIN INTERIM STATUS. IN ADDITION, SINCE THIS FACILITY IS PERMITTED UNDER RCRA, THEIR REVISED PART B FOR A CLASS 3 MOD IS DUE ON FEB 21, 1992.

• THE MEAN TIME:

• THE FACILITY WILL GET INTERIM STATUS UNDER BIF IF THEY SUBMIT THEIR PART A & PRECOMP. CERT ON TIME

• THE FACILITY IS PROHIBITED FROM BURNING ~~HW~~ F032 DURING INTERIM STATUS UNLESS CHANGED IN FEDERAL REGISTER.

• THEIR 'ASH DISPOSAL PLAN' WILL BE REVIEWED AND APPROVED THROUGH THE PART B PERMIT PROCESS - IN THE MEAN TIME, ANY ASH GENERATED ~~DURIN~~ FROM BURNING HW ^(EXCEPT F032) WILL BE AT THEIR OWN RISK - RECOMMEND THOROUGH DOCUMENTATION FOR ENFORCEMENT REVIEW PLAN MUST INCLUDE DIOXIN ANALYSIS IF F032 IS BURNED.

Record of Communication w/ Beth Antley

2/2/91

• Bob Holloway, OSW

Due to health affects study that resulted in F032 not being an acutely hazardous waste, Bob doesn't feel comfortable adding F032 to six-wines in the BIF reg at the last minute. He needs to look into this some more. However, he did agree that the wording of 266.103(a) still would prohibit F032 during interim status. He also agreed to keep this issue on the table when proposed BIF reg changes are done. We need to be consistent among all the dioxin wastes.

Record of Communication w/ Beth Antley

8/2/91

- Steve Smith, Roppers & Dudley Deville,
(Steve) Woodward Cline

He had talked to Bob Holloway this morning and explained the health study to Bob. His understanding was that Bob was going to reconsider adding F032 in the technical amendment, and they will be able to burn it. I said that the technical amendment is being reconsidered, but this really only impacts the permit standards re: six-nines. The wording of the BIF interim status prohibition still restricts them from burning F032 under interim status. I said Bob Holloway agreed with R4 on this. Steve will call Bob Holloway again.

SAMPLES
3 HOLES FOR WAYNE

ANALYSIS FOR
SUBSURFACE

Re: Koppers Industries,
Tie Plant, Mississippi

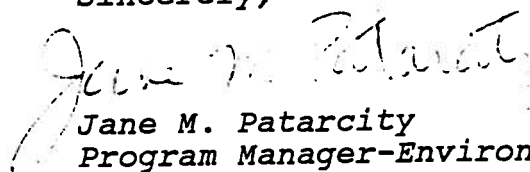
Dear Mr. Carlin:

Attached is a revised access agreement for the installation and sampling of monitoring wells on property you own in the vicinity of the Koppers Industries, Inc. facility, Tie Plant, Mississippi. The revised access agreement addresses the concerns you expressed during our telephone conference on March 4, 1991. As we discussed, these wells are required by the U.S. Environmental Protection Agency and the Mississippi Department of Environmental Quality to be installed as part of a Groundwater Quality Assessment and Resource Conservation and Recovery Act (RCRA) Facility Investigation.

I will call you during the week of April 8, 1991 to discuss the agreement. At this time, we can also discuss the sampling you requested during our telephone conference.

If you have any questions, please call me at 412/227-2185.

Sincerely,


Jane M. Patacity
Program Manager-Environmental Services

/ldh

cc: Mark Hansen

ACCESS AGREEMENT

Wayne E. Carlin and Lucille B. Carlin as owner of the real estate known as Parcel 2, T22N, R5E, Section 33, Grenada County, Grenada MS (hereinafter "Owner") hereby grants to Beazer East, Inc., formerly Koppers Company, Inc. (hereinafter "Beazer"), its employees agents and contractors, the right to, at Beazer's sole cost and expense, enter upon said real property for the sole purpose of surveying, excavating, drilling, coring, sampling, construction of water or other wells and well testing to be located on the said property. The locations of the wells to be installed are shown on Keystone Environmental Resources, Inc. Drawing No. A105096.

Such surveying, excavating, coring, sampling, construction of water or other wells and well testing is being conducted as part of a Groundwater Quality Assessment Investigation and a Resource Conservation and Recovery Act Facility Investigation.

It is expressly agreed and understood that this agreement shall not operate or be construed to create the relationship of landlord and tenant between the parties hereto under any circumstances whatsoever and Owner has absolute, complete and unimpeded right to deal with the real property in question as any other party with free and simple title except that Owners, their heirs, administrators, executors, successors and assigns shall, during the term of this Access Agreement, in no way interfere with the integrity of any water wells constructed on the property by Beazer, its employees, agents or contractors and the right of ingress and egress by Beazer, its employees, agents or contractors to monitor said water wells. This agreement is not to be considered as an easement for Beazer.

Beazer shall provide Owner with all written reports, data, information, conclusions, recommendations and all other work product that impact on the environmental condition of the property, provided such written material is given by Beazer to the Mississippi Department of Environmental Quality or United States EPA.

Beazer agrees to defend, indemnify and save harmless Owner, from all losses, claims, liabilities, expenses and costs (including death) occurring in connection with Beazer exercise of the rights herein granted, or arising from any wrongful or negligent act or omission of Beazer, its employees, agents or contractors, in the performance hereunder.

At such time when monitoring wells and other exploratory borings are no longer needed, Beazer shall remove and abandon each in accordance with applicable requirements of the State of Mississippi.

Upon removal of the wells, Beazer agrees to return the site to it's original condition.

This agreement shall be and remain in effect for a period of one year from the date hereof, and thereafter shall be automatically renewed from year to year until terminated by either party giving to the other not less than sixty (60) days period written notice of termination; provided, however, that any termination of this agreement by either party shall not occur without the prior written consent of the Mississippi Department of Environmental Quality or the United States EPA as the case may require.

IN WITNESS WHEREOF and intending to be legally bound, the parties hereto have caused this instrument to be duly signed this _____ day of _____, 1991.

WITNESS: Beazer East, Inc.

BY: _____

TITLE: _____

DATE: _____

WITNESS:

BY: _____

TITLE: _____

DATE: _____

already operating under interim status, and (3) facilities that have been issued a RCRA permit.

Permitted and interim status facilities can also be affected by today's rule in two distinct ways: (1) The facility may already be managing wastes that are hazardous under the existing EP or TC rules and which also are wastes newly listed under today's rule (and thus the waste would have a new waste code), or (2) the facility may be managing a solid waste which is newly subject to regulation as a result of today's listing.

Of course, generators that qualify for the accumulation provisions of § 262.34 are not considered to be TSDFs with respect to wastes managed under that provision and are not subject to permitting for those activities. The following sections describe the compliance obligations for facilities that have units subject to permitting due to today's listings.

1. Newly Regulated Facilities

Newly regulated facilities (i.e., facilities at which the only hazardous wastes that are treated, stored, or disposed are wastes newly regulated by today's final rule) must qualify for interim status by the effective date of the rule in order to continue managing wastes listed by today's rule prior to receiving a permit. To obtain interim status, an eligible facility must submit a section 3010 notification by March 6, 1991 and submit a permit application to EPA by June 6, 1991. (See 270.70(a).) Interim status facilities are subject to the same standards in subpart W as facilities managing wastes regulated by EPA or an authorized state. If a facility retains interim status, a new land disposal facility must submit a RCRA permit application one year after the effective date of today's rule and certify that the facility is in compliance with all applicable water monitoring and financial responsibility requirements in section 3005(e)(3) and 40

2. Permitted and Interim Status Facilities

Facilities which have been managing EP or TC wastes which are newly listed today must notify EPA of the waste code changes for these wastes. Permitted facilities must submit permit modifications to EPA as required under 40 CFR 270.42 that reflect the new waste codes. Interim status facilities must submit revised part A permit applications in accordance with 40 CFR 270.72. These facilities must continue to comply with the applicable federal

rules for hazardous waste management.

Permitted and interim status facilities which manage a solid waste that is newly defined as hazardous waste as a result of today's rule must also submit Class 1 permit modification requests or part A permit application revisions to EPA. Facilities must manage these wastes in accordance with 40 CFR part 265 or 40 CFR part 264 until permit modification or issuance, depending on whether the waste is managed in a newly regulated or previously regulated unit.

For permitted facilities, the Class 1 modification must be submitted to EPA by June 6, 1991, and should include a revised part A form clearly indicating all activities that are newly regulated as a result of today's listings, and any other description that will clarify which units at the facility are managing the new wastes. Also as part of the § 270.42(g) procedure for identifying newly listed wastes at permitted facilities, the permittee must notify the public within 90 days of the Class 1 submittal to the Agency.

A subsequent Class 2 or 3 permit modification (if necessary) must be submitted 180 days after the effective date of today's listings, and it is at this time that detailed part B information must be submitted. If a new land

implement this rule until the state is authorized to do so, the permittee must comply with Federal permit modification procedures under 40 CFR 270.42 rather than state permit modification procedures. However, because the permit undergoing modification is most likely a joint EPA-State RCRA permit, a copy of the modification request should also be submitted to the authorized State. Similarly, interim status facilities managing F032 wastes must submit a revised part A permit application to EPA pursuant to 40 CFR 270.72, with a copy to state permitting authorities. Although these facilities must make appropriate waste code (and unit type, if applicable) modifications to reflect the new listing, the wastes are already regulated as EP wastes under the authorized state program. Accordingly, such wastes may not be subject to any new management requirements as a result of this rule if they are managed in tanks, land disposal units, or other units described in 40 CFR parts 264/265, subparts I through Q.

Some permitted and interim status facilities in authorized states will be managing F032 wastes which are hazardous as a result of the toxicity characteristic, which became effective on September 25, 1990, but were not regulated as EP wastes under the

10/14/91: KOPPERS filed A PROTECTIVE FILING FOR K032 ON JUNE 5, 1991. A PUBLIC NOTICE NEEDED TO BE FILED WITHIN 90 DAY OF THIS REVISED PART A. PART B MUST BE RECEIVED WITHIN 180 DAY (OR DEC 6, 1991)

For facilities which have been managing EP wastes under an authorized State program which are also F032 wastes, the facility will need to change the waste code (and possibly also change the unit type, if a drip pad is used) assigned to its wastes. Permitted facilities must submit permit modifications to EPA reflecting the new waste codes (and unit types, if applicable). Because EPA must

implement this rule until the state is authorized to do so, the permittee must comply with Federal permit modification procedures under 40 CFR 270.42 rather than state permit modification procedures. However, because the permit undergoing modification is most likely a joint EPA-State RCRA permit, a copy of the modification request should also be submitted to the authorized State. Similarly, interim status facilities managing F032 wastes must submit a revised part A permit application to EPA pursuant to 40 CFR 270.72, with a copy to state permitting authorities. Although these facilities must make appropriate waste code (and unit type, if applicable) modifications to reflect the new listing, the wastes are already regulated as EP wastes under the authorized state program. As a result, if these wastes are in a previously unregulated unit, they will be subject to the self-implementing Federal standards for hazardous waste management at 40 CFR part 265 until permit issuance (for interim status facilities) or modification (for permitted facilities). After permit issuance or modification, the Federal permitting standards at 40 CFR part 264 will apply to these wastes (or the state

stated opinion that Part B mod would be due on or before Dec 6, 1991 (180 day after effective date of new listing). Also stated opinion that public notice must

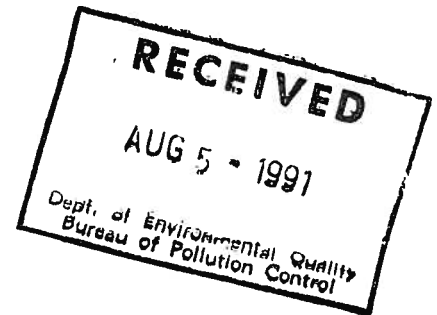
KOPPERS INDUSTRIES

Koppers Industries, Inc.
P.O. Box 160
Tie Plant, MS 38960

Telephone: (601) 226-4584
FAX: (601) 226-4588

August 2, 1991

Mr. Brian Donaldson
United States Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia
30365

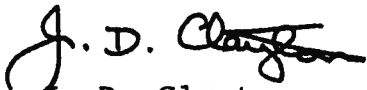


Dear Mr. Donaldson:

On December 6, 1990 (55 FR 50450) EPA published a final rule listing as hazardous three categories of wastes from wood preserving operations. On June 13, 1991 (56 FR 27332) EPA published an administrative stay of the waste listings which, among other things, conditionally extended the effective date.

In accordance with the stay, we are hereby providing notice that Koppers Industries, Inc., Grenada, Mississippi will upgrade the existing drip pad by February 6, 1992. Moreover, Koppers Industries, Inc., will use its best efforts to minimize drippage that occurs during the duration of the stay.

Sincerely Yours,


J. D. Clayton

JDC/jrb

CC: Sam Mabry
Ms. Dept. of Environmental Quality
Bureau of Pollution Control
P. O. Box 10385
Jackson, Ms. 39289-1385

R. S. Ohlis, K-1750

NEWCOMER, SHAFFER, BIRD & SPANGLER
LAWYERS

WAYNE E. SHAFFER
DAVID C. NEWCOMER
JOHN S. SHAFFER
STEVEN R. BIRD
MICHAEL W. SPANGLER
MICHAEL A. SHAFFER

CORNER OF LYNN & MAPLE STREETS
BRYAN, OHIO 43506-1891
TELEPHONE: 636-3196
FAX: 636-0867
AREA CODE 419

ARTHUR S. NEWCOMER
J. ROBERT GEESEY
OF COUNSEL
JAMES A. HUTTON
1939-1984

July 31, 1991

COPY

Mr. Mark Hansen
Beazer East, Inc.

Re: Wayne E. and Lucille B. Carlin

Dear Mr. Hansen:

I had previously, by facsimile transmission, forwarded you a letter on behalf of Wayne Carlin. Apparently, the letter did not find its way to your desk. Therefore, I am forwarding you a second letter with our comments and request for corrections and modifications to the proposed access agreement. Set forth below is a summary of our comments.

Your document specifically provides that the agreement is not to be considered as an easement. It is our contention that the language in the agreement does give rise to the creation of an easement. Easement in its traditional sense, is defined as a servitude imposed as a burden upon land and entitles the owner of the interest arising out of the easement to use and enjoy the land in some limited fashion. Therefore, we believe that it should be captioned as such and that the sentence in the agreement regarding an easement be deleted.

Mr. Carlin is also requesting that independent testing be performed on his behalf. Specifically, Mr. Carlin is requested that 3 samples be taken at locations to be determined by Mr. Carlin and/or his authorized agent, and that these samples be tested in the same manner in which the samples taken by Beazer will be tested. Furthermore, Mr. Carlin shall be provided copies of reports, data, information, conclusions, recommendations and all other work product that impact on the environmental condition of the property as it relates to the samples taken at the request of Mr. Carlin.

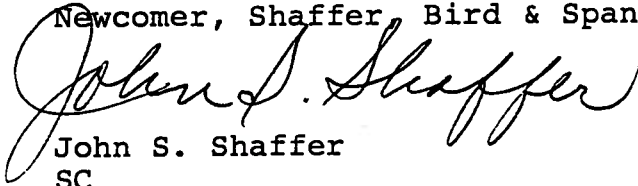
Mr. Mark Hansen
July 31, 1991
Page 2

We are also concerned as to the manner in which the easement is to be terminated. Your proposed agreement provides "At such time when monitoring wells and other exploratory borings are no longer needed, Beazer shall remove and abandon each in accordance with applicable requirements of the State of Mississippi." It would be our hope that an absolute time limit, e.g., 1, 2, 3, 5 years, be included as a part of that paragraph.

If these proposed modifications are acceptable, we will be more than happy to redraft the proposed agreement.

Very truly yours,

Newcomer, Shaffer, Bird & Spangler

A handwritten signature in cursive script, reading "John S. Shaffer". The signature is written in dark ink and is positioned over the typed name and state of the signatory.

John S. Shaffer
SC

JUL-31-1991 09:57 FROM

BEAZER ENVIRONMENTAL

TO

96013546612

P.01

DIVISION OF SOLID WASTE

REVIEWED BY

DKP

DATE

07/31/91

COMMENTS

Beazer East, Inc.
Environmental Services
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer

FAX COVER SHEET

PLEASE FORWARD FAX TO:

Dave Periock

MDNR

FAX NUMBER:

601-354-6612

FROM:

Jim Werling

Beazer East, Inc.

FAX Number: (412) 227-2950

Number of pages to follow:

2

Comments:

RE: GRANADA OFF SITE ACCESS

If you have any questions regarding this fax, please call
Donna Kopach at (412) 227-2941

Thank you for your help in distributing this fax!!!

AL-31-1991 09:57 FROM BEAZER ENVIRONMENTAL

TO

96013546612 P.02

601-354-6614

**NEWCOMER, SHAFFER, BIRD & SPANGLER
LAWYERS**

WAYNE E. SHAFFER
DAVID C. NEWCOMER
JOHN S. SHAFFER
STEVEN R. BIRD
MICHAEL W. SPANGLER
MICHAEL A. SHAFFER

CORNER OF LYNN & MAPLE STREETS
BRYAN, OHIO 43806-1691
TELEPHONE 808-3196
FAX 836-0867
AREA CODE 419

ARTHUR S. NEWCOMER
J. ROBERT GREGG
OF COUNSEL
JAMES A. HUTTON
1909-1994

July 31, 1991

Mr. Mark Hansen
Beazer East, Inc.

Re: Wayne E. and Lucille B. Carlin

Dear Mr. Hansen:

I had previously, by facsimile transmission, forwarded you a letter on behalf of Wayne Carlin. Apparently, the letter did not find its way to your desk. Therefore, I am forwarding you a second letter with our comments and request for corrections and modifications to the proposed access agreement. Set forth below is a summary of our comments.

Your document specifically provides that the agreement is not to be considered as an easement. It is our contention that the language in the agreement does give rise to the creation of an easement. Easement in its traditional sense, is defined as a servitude imposed as a burden upon land and entitles the owner of the interest arising out of the easement to use and enjoy the land in some limited fashion. Therefore, we believe that it should be captioned as such and that the sentence in the agreement regarding an easement be deleted.

Mr. Carlin is also requesting that independent testing be performed on his behalf. Specifically, Mr. Carlin is requested that 3 samples be taken at locations to be determined by Mr. Carlin and/or his authorized agent, and that these samples be tested in the same manner in which the samples taken by Beazer will be tested. Furthermore, Mr. Carlin shall be provided copies of reports, data, information, conclusions, recommendations and all other work product that impact on the environmental condition of the property as it relates to the samples taken at the request of Mr. Carlin.

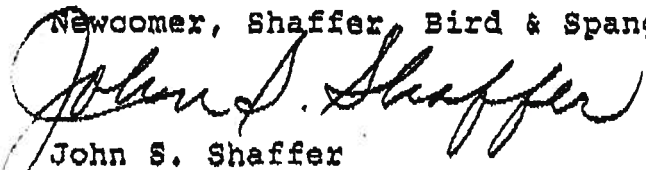
Mr. Mark Hansen
July 31, 1991
Page 2

We are also concerned as to the manner in which the easement is to be terminated. Your proposed agreement provides "At such time when monitoring wells and other exploratory borings are no longer needed, Beazer shall remove and abandon each in accordance with applicable requirements of the State of Mississippi." It would be our hope that an absolute time limit, e.g., 1, 2, 3, 5 years, be included as a part of that paragraph.

If these proposed modifications are acceptable, we will be more than happy to redraft the proposed agreement.

Very truly yours,

Newcomer, Shaffer, Bird & Spangler



John S. Shaffer
SC

MEMO FOR FILE

DATE: July 30, 1991

NAME: DKP

SUBJECT: KOPPERS (BEAZER) - REQUEST FOR CLARAFACON
CONCERNING TIME-FRAME IMPOSED BY NEW
EPA WOOD-TREATING REQ

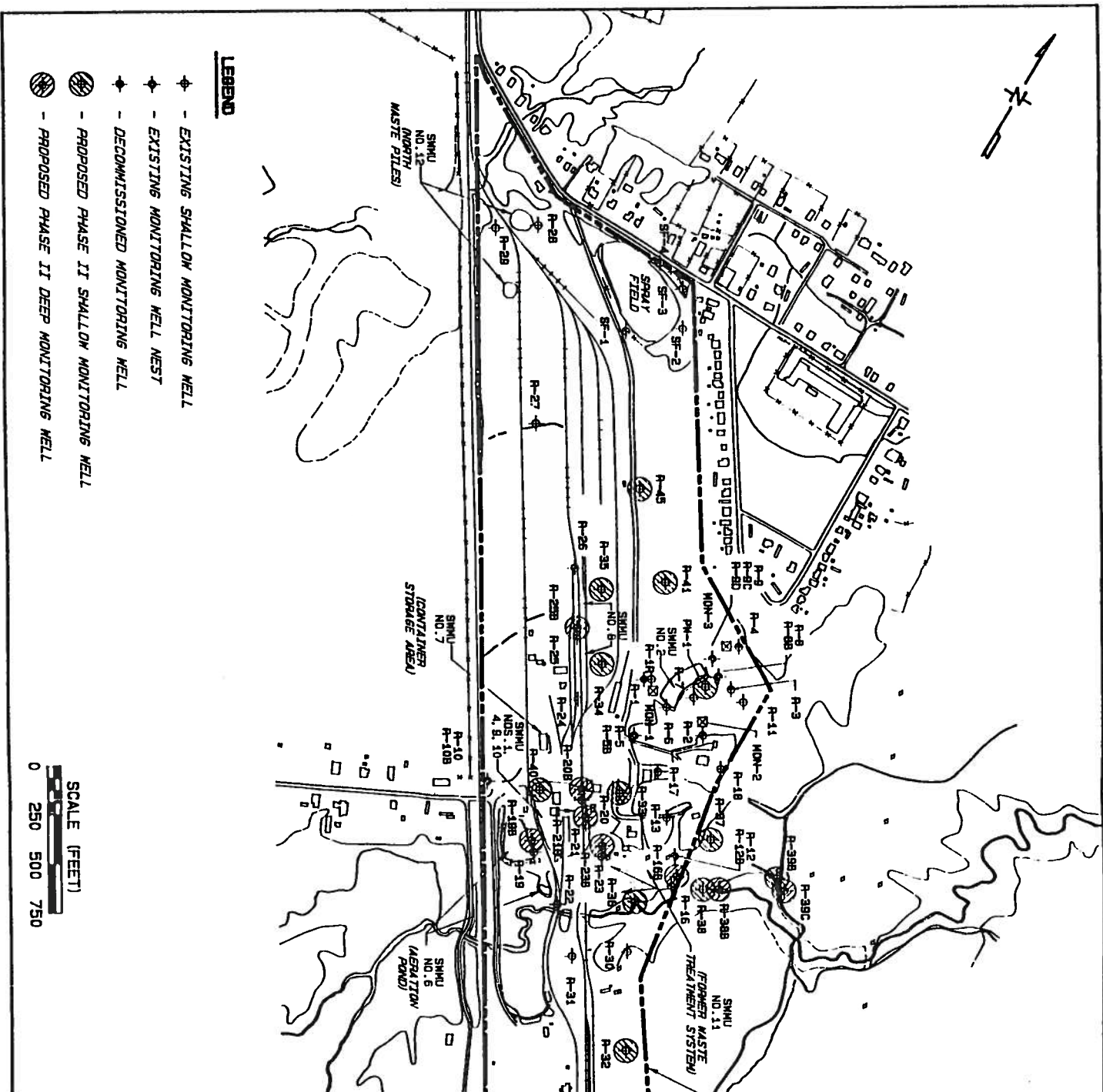
— RETURNED PHONE CALL OF GARY EDWARDS
(412-825-9615) @ KEYSTONE

EXPLAINED THAT OUR INTERPUTATION
OF THE NEW REGS WAS THAT A PART
A MODIFICATION WAS REQUIRED BY JUNE
6, 1991 (BEAZER SUBMITTED JUNE 5, 1991)

FROM THE EFFECTIVE DATE OF THE
NEW LISTING -(JUNE 6, 1991) BEAZER HAS
90 DAYS TO GO TO PUBLIC NOTICE & 180
DAY TO SUBMIT A PART B PERMIT
MODIFICATION.

— ALL THIS WAS TO BE HANDLED BY
EPA W/ COPY TO LS

DKP





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUL 25 1991

4WD-RCRAFFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. D. Clayton
Koppers Industries, Inc.
Tie Plant Road
Tie Plant, Mississippi 38960

Subject: Resource Conservation and Recovery Act (RCRA)
Compliance Dates for Wood Preserving Listings

Dear Mr. Clayton:

On December 6, 1990, the U.S. Environmental Protection Agency ("EPA") promulgated a final rule that lists wastes from wood preserving processes as hazardous, making the management of these wastes subject to regulation under Subtitle C of RCRA. This rule, published in the Federal Register on December 6, 1990, at page 50450 (see enclosures), lists as hazardous three categories of wastes from wood preserving facilities that use chlorophenolic, creosote and/or inorganic (arsenical and chromium) preservatives. The listings include wastewaters, process residuals, preservative drippage, and spent preservatives from wood preserving processes. The rule also establishes standards for management of these hazardous wastes on drip pads and establishes construction and design standards for these pads. The effective date of this rule was June 6, 1991.

An administrative stay effective on June 5, 1991, and published in the Federal Register on July 13, 1991, at page 27332 (see enclosures), conditionally extended the effective date of the drip pad management standards promulgated in the December 6, 1990, final rule. Specifically, the stay provided that activities that would otherwise constitute disposal of the newly listed wastes into the process areas, or onto existing drip pads in these areas, are not covered by the listings during the duration of the stay.

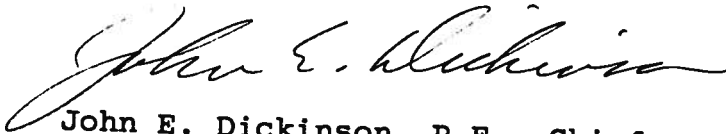
The stay applies only to those facilities that intend to comply with the drip pad management standards and that make a bona fide effort to do so during the stay period. On or before August 6, 1991, wood preserving facilities affected by the stay must notify EPA of their intent to follow one of the following courses of action: upgrade an existing pad by February 6, 1992; install a new pad by May 6, 1992; operate with an existing pad in compliance with the management standards; or cease operations by August 7, 1991. If these rules are applicable to your facility, such notification should be made to the attention of Brian Donaldson at the above address.

- 2 -

If you fail to make such notification, your facility must cease operation of the drip pad area on or before August 7, 1991. Continued operation of this area without such notification could result in a violation of RCRA and the assessment of penalties.

If you have any questions concerning this matter, please contact Brian Donaldson at (404) 347-7603.

Sincerely,



John E. Dickinson, P.E., Chief
Waste Compliance Section
RCRA and Federal Facilities Branch

Enclosures

cc: Sam Mabry, MDEQ



Beazer



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

RECEIVED

JUL 09 1991

Dept. of Environmental Quality
Bureau of Pollution Control

June 28, 1991

Ms. Gail Macalusa
Mississippi Department of
Environmental Quality
Bureau of Pollution Control
P.O. Box 10385
2830 Highway 80 West
Jackson, Mississippi 39209

Re: EPA ID #MSD 007 027 543

Dear Ms. Macalusa:

Please be advised that Beazer East, Inc. will reduce the post-closure cost estimate for the Surface Impoundment and Ash Farm units at the Grenada facility to reflect the completion of another year of post-closure care, which commenced upon the certification of closure of the subject hazardous waste management units. The post-closure costs, for which we are financially assuring, will be reduced by estimated costs for one year and will reflect estimated costs for the remaining 27 and 26 years of post-closure activity for the Surface Impoundment and Ash Farm respectively. We assume that this is an approved reduction, unless we hear from you to the contrary.

Please do not hesitate to contact me at (412)227-2189, or Russell Vorpe at (412) 227-2821 if you have any questions.

Sincerely

James A. Werling
Program Manager - Environmental Services

JAW/dlk

cc: R. G. Hamilton
R. S. Vorpe
T. Hopper (MDEQ)
J. H. Scarbrough (US EPA)

DIVISION OF SOLID WASTE

REVIEWED BY DKP

DATE 07/31/91

COMMENTS SHOULD RECEIVE

DOC. IN SEPT. NEED TO

CHECK INFORMATION FACTOR USED

MEMO FOR FILE

DATE: July 29, 1991

NAME: KOPPERS (BEAZER)

SUBJECT: -ACCESS TO OFF-SITE PROPERTY FOR INSTALLATION
OF MONITOR WELLS —

CALLED MR. WAYNE CARLIN @ 419-682-6441
TO INQUIRE AS TO BEAZER'S EFFORTS
TO GAIN ACCESS TO USE MR. CARLIN
PROPERTY & AND WHAT SOME OF THE
MAJOR STICKING POINTS WERE.

HE STATED THAT ORIGINALLY MAIN
CONCERN WAS THAT BEAZER EXPRESSED
COMPANY POLICY OF NO MONETARY COMPENSATION
FOR USE OF LAND.

MORE RECENTLY MR. CARLIN AND HIS LAWYER
DRAFTED A PROPOSAL TO BEAZER, REQUIRING
BEAZER TO TAKE SEVERAL SHALLOW SOIL
BORINGS BETWEEN THEIR PROPERTY AND THE
PROPOSED WELLS (SOIL TO BE ANALYZED
AT BEAZER'S EXPENSE) AND REQUIRING
THAT BEAZER SUPPLY MR. CARLIN WITH
COPIES OF THE QUARTERLY GROUNDWATER
REPORTS. HE STATED HE HAS RECEIVED
NO RESPONSE FROM BEAZER ON THIS
PROPOSAL.

ASKED FOR COPY OF THIS ~~PROPOSAL~~ PROPOSAL
AND MR. CARLIN EXPRESSED NO RESERVATION
CONCERNING SENDING A COPY TO MDEQ

DKP



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

July 8, 1991

CERTIFIED MAIL NO. P 675 195 859

Mr. James A. Werling
Beazer East, Inc.
436 Seventh Avenue
Pittsburg, PA 15219

RE: Comprehensive Groundwater
Monitoring Inspection
Koppers Industries, Inc.
Tie Plant, MS

Dear Mr. Werling:

Enclosed please find a Comprehensive Monitoring Inspection report and checklist completed as a part of the Comprehensive Monitoring Evaluation (CME) conducted December 11, 1990, at Koppers Industries, Inc. in Tie Plant, Mississippi. The Compliance Evaluation Inspection portion of the CME was mailed to Beazer under separate cover.

No violations were observed during the groundwater monitoring inspection. However, on the day of the inspection, monitoring well R-6 was noted to be damaged. This well should be properly plugged and abandoned to prevent possible migration of contaminants to the groundwater. In addition, samples for metals analysis should be analyzed for both total and dissolved constituents, as maximum concentration limits (MCLs) for groundwater are established using total concentrations.

Mr. James A. Werling
July 8, 1991
Page 2

If you have questions concerning this matter, please contact Mr. David Pentecost at (601) 961-5171.

Sincerely,

Thad Hopper / By David C. Pentecost

Thad Hopper
Hazardous Waste Division

TH:DP:lfc

Enclosure

cc: Mr. James H. Scarbrough, EPA
Mr. J. D. Clayton, Koppers Industries, Inc. Tie Plant, MS



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

RECEIVED

JUN 10 1991

Dept. of Environmental Quality
Bureau of Pollution Control

June 7, 1991

Mr. Thad Hopper
Mississippi Department of Environmental
Quality
2380 Highway 80 West
Jackson, MS 39204

Re: Offsite Access - Groundwater
Quality Assessment and RFI
Koppers Industries, Inc.
Grenada Facility
Tie Plant, Mississippi

Dear Mr. Hopper:

As per our phone conversation, attached is the access agreement sent to Mr. and Mrs. Wayne Carlin to obtain access to offsite monitoring well locations.

If you have any questions, please call me at 412/227-2185.

Sincerely,

Jane M. Patarcity
Program Manager-Environmental Services

/ldh

cc: J. Werling
M. Hansen



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

April 8, 1991

FEDERAL EXPRESS

Mr. Wayne E. and Mrs. Lucille B. Carlin
Route 2
Stryker, OH 43557

Re: Koppers Industries, Inc.
Tie Plant, Mississippi

Dear Mr. Carlin:

Attached is a revised access agreement for the installation and sampling of monitoring wells on property you own in the vicinity of the Koppers Industries, Inc. facility, Tie Plant, Mississippi. The revised access agreement addresses the concerns you expressed during our telephone conference on March 4, 1991. As we discussed, these wells are required by the U.S. Environmental Protection Agency and the Mississippi Department of Environmental Quality to be installed as part of a Groundwater Quality Assessment and Resource Conservation and Recovery Act (RCRA) Facility Investigation.

I will call you during the week of April 8, 1991 to discuss the agreement. At this time, we can also discuss the sampling you requested during our telephone conference.

If you have any questions, please call me at 412/227-2185.

Sincerely,

A handwritten signature in cursive script that reads "Jane M Patacity". The signature is written in dark ink and is positioned above the typed name and title.

Jane M. Patacity
Program Manager-Environmental Services

/ldh

cc: Mark Hansen

ACCESS AGREEMENT

Wayne E. Carlin and Lucille B. Carlin as owner of the real estate known as Parcel 2, T22N, R5E, Section 33, Grenada County, Grenada MS (hereinafter "Owner") hereby grants to Beazer East, Inc., formerly Koppers Company, Inc. (hereinafter "Beazer"), its employees agents and contractors, the right to, at Beazer's sole cost and expense, enter upon said real property for the sole purpose of surveying, excavating, drilling, coring, sampling, construction of water or other wells and well testing to be located on the said property. The locations of the wells to be installed are shown on Keystone Environmental Resources, Inc. Drawing No. A105096.

Such surveying, excavating, coring, sampling, construction of water or other wells and well testing is being conducted as part of a Groundwater Quality Assessment Investigation and a Resource Conservation and Recovery Act Facility Investigation.

It is expressly agreed and understood that this agreement shall not operate or be construed to create the relationship of landlord and tenant between the parties hereto under any circumstances whatsoever and Owner has absolute, complete and unimpeded right to deal with the real property in question as any other party with free and simple title except that Owners, their heirs, administrators, executors, successors and assigns shall, during the term of this Access Agreement, in no way interfere with the integrity of any water wells constructed on the property by Beazer, its employees, agents or contractors and the right of ingress and egress by Beazer, its employees, agents or contractors to monitor said water wells. This agreement is not to be considered as an easement for Beazer.

Beazer shall provide Owner with all written reports, data, information, conclusions, recommendations and all other work product that impact on the environmental condition of the property, provided such written material is given by Beazer to the Mississippi Department of Environmental Quality or United States EPA.

Beazer agrees to defend, indemnify and save harmless Owner, from all losses, claims, liabilities, expenses and costs (including death) occurring in connection with Beazer exercise of the rights herein granted, or arising from any wrongful or negligent act or omission of Beazer, its employees, agents or contractors, in the performance hereunder.

At such time when monitoring wells and other exploratory borings are no longer needed, Beazer shall remove and abandon each in accordance with applicable requirements of the State of Mississippi.

Upon removal of the wells, Beazer agrees to return the site to it's original condition.

This agreement shall be and remain in effect for a period of one year from the date hereof, and thereafter shall be automatically renewed from year to year until terminated by either party giving to the other not less than sixty (60) days period written notice of termination; provided, however, that any termination of this agreement by either party shall not occur without the prior written consent of the Mississippi Department of Environmental Quality or the United States EPA as the case may require.

IN WITNESS WHEREOF and intending to be legally bound, the parties hereto have caused this instrument to be duly signed this _____ day of _____, 1991.

WITNESS: Beazer East, Inc.

WITNESS:

BY: _____

BY: _____

TITLE: _____

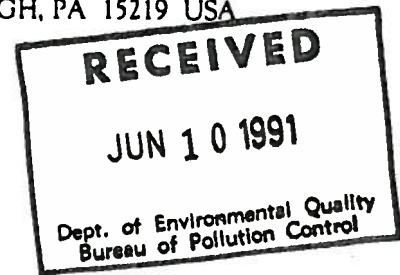
TITLE: _____

DATE: _____

DATE: _____



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA



June 7, 1991

Mr. James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, NE
Atlanta, GA 30365

Re: Koppers Industries, Inc.
Grenada RFI
Grenada Tie Plant, Mississippi

Dear Mr. Scarbrough:

The purpose of this correspondence is to notify you our difficulties in obtaining access to offsite monitoring well locations for the above-referenced RFI. Beazer East, Inc. has been unable to obtain access to the properties owned by Mr. and Mrs. Wayne Carlin. A standard access agreement, forwarded to the owners on September 27, 1989 for purposes of the Groundwater Quality Assessment (GWQA) was initially rejected. A revised access agreement which included the offsite wells necessary for the RFI and GWQA was mailed to the owners on April 8, 1991. To date, the property owners have not provided access and are still reviewing the proposed agreement.

Access to the properties in question is necessary for the installation of offsite monitoring wells R-37, R-39B, R-39C, R38B, R-38 as shown on Figure 5-3 of the RFI Work Plan and for the Groundwater Quality Assessment. At this time, all other wells have been installed, and the test boring program is proceeding on schedule. Because access to the above-mentioned areas cannot be obtained Beazer East, Inc. will be unable to meet the schedule provided in the RFI Work Plan. These wells will be installed once access is obtained.

Mr. James H. Scarbrough, P.E.
June 7, 1991
Page 2

If you have any questions, please do not hesitate to contact me at 412/227-2185. We will keep you informed of our progress in obtaining access.

Sincerely,

A handwritten signature in cursive script that reads "Jane M. Patacity".

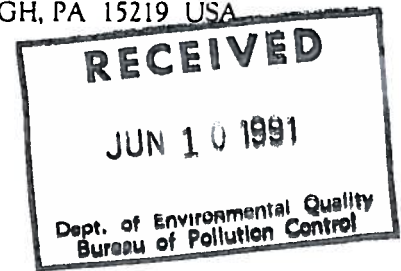
Jane M. Patacity
Program Manager - Environmental Services

JMP/dlk

cc: J. Mark Hansen
J. Werling
R. G. Hamilton
J. D. Clayton (KII - Grenada)
J. Batchelder (KII)
T. Hopper - (MDEQ)



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA



June 6, 1991

Mr. James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Re: Koppers Industries, Inc.
Tie Plant, Mississippi
Personnel Change

Dear Mr. Scarbrough:

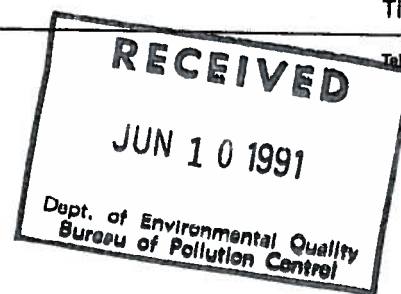
Please be advised that Mr. James A. Werling, Jr. will be replacing me as the Program Manager for the above-mentioned site. Mr. Werling will be assuming all of the responsibilities I previously held in regard to program administration for the site. Seven days from the receipt of this notification, please direct all correspondence and phone conversations to Mr. Werling. Mr. Werling can be reached by phone at (412) 227-2189.

Sincerely,

Jane M. Patacity
Program Manager - Environmental Services

JMP/dlk

cc: B. Nolan
M. Hansen
T. Hopper - (MDEQ)
P. Anderson - (EPA)
J. D. Clayton (KII - Grenada)
S. Smith (KII)
J. Batchelder (KII)

Telephone: (601) 226-4584
FAX: (601) 226-4588

May 30, 1991

Ron Morgan, City Manager
P. O. Box 310
Grenada, Ms. 38901

Dear Mr. Morgan:

The U.S. EPA recently passed additions to the regulations determining what materials are considered to be hazardous waste. The additions to 40 CFR 261 listed wastes from wood preserving operations very broadly, including waste water. The new hazardous listings include:

F032 for wastes from wood treating plants which use chlorophenolic formulations, and

F034 for wastes from wood treating plants which use creosote formulations.

F035 for wastes from wood treating plants which use inorganic preservatives containing arsenic or chromium. (No F035 waste waters are discharged to POTW's).

The effective date for the listings is June 6, 1991 for F032 wastes and for the other wastes in states without RCRA authorization. F034 listings will become effective in authorized states upon enactment of implementing state regulations.

The change in what we must call our effluent will not change the quality of our effluent discharged to your system nor will it change how you must handle or treat it. 40 CFR 261.4 excludes industrial waste water discharges from the RCRA definition of solid waste. That section states in part:

The following materials are not solid wastes for the purpose of this part:

- 1) (i) Domestic sewage; and
(ii) Any mixture of domestic sewage and other wastes that passes through a sewer system to a publicly-owned treatment works for treatment.
- 2) Industrial waste water discharges that are point source discharges subject to regulation under Section 402 of the Clean Water Act, as amended.

This notification is being provided to you by KII to meet the notification requirements of 40 CFR 403.12 (p)(i). That section requires us to provide you with the following information:

Page -2-

Name of Hazardous Waste: Waste water from wood preserving process at plants
that use chlorophenolic formulations.

Hazardous Waste Number: F032 (and/or F034)

Type of Discharge: Continuous

Estimated mass and concentration of constituents:


<u>Constituent</u>	<u>Annual Mass</u>	<u>Monthly Mass</u>
Pentachloropheno1	1	1/12 of 1b.

Waste Minimization

I certify that Koppers Industries, Inc. Grenada, Ms. Plant has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.

Please note that our waste water is only hazardous waste up until the point of discharge to the sewer system, at which point it is excluded from the definition of solid waste. It would only remain hazardous waste if otherwise disposed. Once introduced to the sewer system, it is no longer hazardous waste. Please call me if you have any questions.

Sincerely,


J. D. Clayton
Plant Manager

cc: Director, Div. Solid Waste Mgmt. - Jackson, Ms.
Region IV Director, Waste Mgmt. Div. - Atlanta, Ga.
Doyle Nail, Bogue Basin Water-Sewer District - Grenada, Ms.
W. R. Donley K-1750
S. T. Smith K-1800



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

JUN 10 1991

June 7, 1991

FEDERAL EXPRESS

Mr. James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Re: Update on Soil Pile Status
Koppers Industries, Inc.
Tie Plant, Mississippi

Dear Mr. Scarbrough:

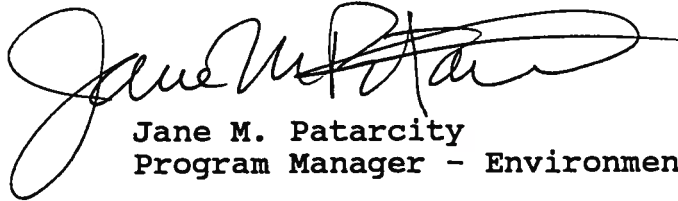
This letter is provided to update you on activities at the above-referenced site relating to the drip track pad soil piles described in a previous letter we submitted to the Mississippi Department of Environmental Quality (MDEQ) on February 8, 1991 (enclosed). In May of this year, Koppers Industries, Inc. (KII) installed concrete curbing to enhance the performance of the recently installed drip track pad. This improvement required the excavation of approximately 400 cu. yds. of soil. Also in May, KII excavated an additional 200 cu. yds. of soil material while refurbishing and making improvements to the treating room. Each quantity of soil was segregated and stockpiled in the area adjacent to the previously deposited drip track soils. These piles will also be covered with plastic sheeting as were the previous piles.

These materials will be characterized in a manner similar to that described in the February 8 letter for the existing soil piles during the ongoing RFI. Remediation of this material will be incorporated into the overall corrective action to be conducted at the facility. This soil will be considered in the Corrective Measures Study (CMS) which will be initiated following completion of the RFI. The CMS will develop, evaluate and recommend corrective actions alternatives to address this soil in addition to other potentially impacted soils that may exist.

Mr. James H. Scarbrough
June 7, 1991
Page 2

If you have any questions or comments, please call me at 412/227-2185.

Sincerely,



Jane M. Patarcity
Program Manager - Environmental Services

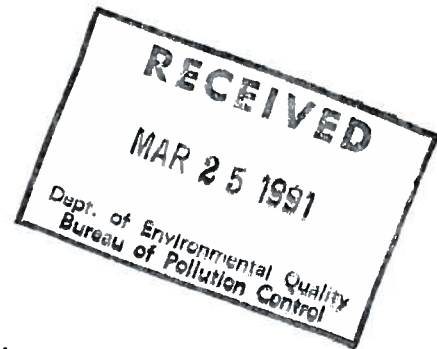
JMP/dlk

Enclosure

cc:	B. Nolan	-	w/o Enclosure
	J. Mark Hansen		"
	R. G. Hamilton		"
	T. Hopper (MDEQ)		"
	J. D. Clayton (KII-Grenada)		"
	S. Smith (KII)		"
	J. Batchelder (KII)		"



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA



March 22, 1991

Mr. Thad Hopper
Hazardous Waste Division
State of Mississippi
Department of Environmental Quality
2380 Highway 80 West
Jackson, MS 39204

Re: Analytical Results Soil Pile
Koppers Industries, Inc.
Tie Plant, Mississippi

Dear Mr. Hopper:

As per my February 8, 1991 letter regarding the Compliance Evaluation Inspection at the above-referenced facility, attached are analytical results for the soil pile in the south yard.

If you have any questions, please call me at 412/227-2185.

Sincerely,

Jane M. Patacity
Program Manager-Environmental Services

/ldh

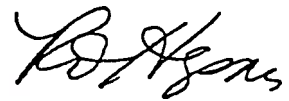
cc: M. Hansen
R. Clayton - KII
J. Batchelder - KII

KEYSTONE ENVIRONMENTAL RESOURCES

Interoffice Correspondence

To	D. L. King	From	R. D. Hepner
Location	North Little Rock	Location	Monroeville
Subject	Grenada (176900)	Date	October 13, 1988

Attached are the results of the analyses on the Tank Farm composite sample received on September 19, 1988.



R. D. Hepner

RDH/wce

Attachment

cc: R. Anderson

RECEIVED

DEC 28 1988

KEYSTONE
Environmental Resources

KEYSTONE ENVIRONMENTAL RESOURCES, C.

TABLE OF CONTENTS

PRODUCED ON 10/13/88 AT 12:39 PAGE

SAMPLE #	SOURCE	DESCRIPT	DATE-COL	DATE-REC	ORD #
38090573	TANK FARM	SOIL SAMPLE	09/08/88	09/19/88	M8809088

KEYSTONE ENVIRONMENTAL RESOURCES, INC.

TABLE 1: SUMMARY OF ANALYTICAL DATA

PRODUCED ON 10/13/88 AT 12:40 PAGE

SAMPLE #	RSLT. LNE	SOURCE
% FIXED RESIDUE		
88090573	% Fixed Residue @550... : 88.4	TANK FARM
% SOLIDS		
88090573	% Solids @103 C..... : 98.0	TANK FARM
GROSS HEAT OF COMBUSTION		
88090573	BTU/lb..... : 1020	TANK FARM
HEXAVALENT CHROMIUM		
88090573	Chromium (+6)mg/Kg..... : <5.00	TANK FARM
OIL & GREASE, TOTAL RECOVERABLE, GRAVIMETRIC		
88090573	Oil & Grease, mg/Kg.... : 37500	TANK FARM
ORGANIC NITROGEN		
88090573	Org. Nitrogen, mg/Kg... : 322	TANK FARM
TOTAL ORGANIC SULFUR		
88090573	Tot. Org. Sulfur, mg/Kg. : 345	TANK FARM
CYANIDE (FREE)		
88090573	Cyanide(Free), mg/Kg.... : <0.250	TANK FARM
CYANIDE (TOTAL)		
88090573	Cyanide, mg/Kg..... : <0.250	TANK FARM
pH		
88090573	Soil pH, units..... : 7.80	TANK FARM
TOTAL ORGANIC HALOGENS		
88090573	TOX, mg/Kg..... : 1690	TANK FARM

The above results are on an as received basis.

TABLE 2: SUMMARY OF METALS DATA

PRODUCED ON 10/13/88 AT 12:41 PAGE

SAMPLE #	RSLT. LNE	SOURCE
ANTIMONY		
88090573	Antimony, ug/Kg..... : <6000	TANK FARM
ARSENIC		
88090573	Arsenic, ug/Kg..... : 8960	TANK FARM
BARIUM		
88090573	Barium, ug/Kg..... : 91900	TANK FARM
CADMIUM		
88090573	Cadmium, ug/Kg..... : 734	TANK FARM
CHROMIUM		
88090573	Chromium, ug/Kg..... : 30800	TANK FARM
COBALT		
88090573	Cobalt, ug/Kg..... : <5000	TANK FARM
COPPER		
88090573	Copper, ug/Kg..... : 40000	TANK FARM
IRON		
88090573	Iron, ug/Kg..... : 12200000	TANK FARM
LEAD		
88090573	Lead, ug/Kg..... : 60800	TANK FARM
MAGNESIUM		
88090573	Magnesium, ug/Kg.... : 5460000	TANK FARM
MERCURY		
88090573	Mercury, ug/Kg..... : 261	TANK FARM
NICKEL		
88090573	Nickel, ug/Kg..... : 5790	TANK FARM
SELENIUM		
88090573	Selenium, ug/Kg..... : <500	TANK FARM
SILVER		
88090573	Silver, ug/Kg..... : <1000	TANK FARM
TITANIUM		
88090573	Titanium, ug/Kg..... : 98600	TANK FARM
ZINC		
88090573	Zinc, ug/Kg..... : 394000	TANK FARM

The above results are on a dry weight basis.

KOPPERS

Interoffice Correspondence

To R. D. Hepner

From Vaughn Rome11

Location KER/ASD

Location AS

Subject Grenada:5010000 (3705)

Date October 6, 1988

Your samples have been examined by infrared spectral (IR) techniques for characterization with the following results:

<u>Your Sample No.</u>	<u>AL No.</u>	<u>Identification</u>
Blank	182838	Polydimethyl siloxane (silicone grease), phthalate ester, minor hydrocarbon oil.
88090573	182839	Mixture of polynuclear aromatic hydrocarbons (creosote components) and an aliphatic hydrocarbon (petroleum) oil.

Creosote/oil ratio* = 80/20

*The creosote/oil ratio is calculated assuming a mixture of Grade 1 creosote and Nujol mineral oil is present.

Every precaution has been taken to ensure the accuracy of the data. However, the information is provided subject to the condition that Koppers Company, Inc. will not be liable for any loss or damage resulting from use of the data.

Should the results of the testing be considered for any advertising or promotional purposes, it should be noted that Koppers Company, Inc. does not allow the use of its name to be contained in advertising and/or promotional material.



Vaughn Rome11

/cb

cc: D. Grandy
R. Obrycki
Files

KEYSTONE ENVIRONMENTAL RESOURCES

Interoffice Correspondence

To	D. King	From	R. D. Hepner
Location	North Little Rock	Location	Monroeville
Subject	Grenada (187700)	Date	August 3, 1988

Attached are the results of the analyses on the soil sample received on July 25, 1988.



R. D. Hepner

RDH/wce

Attachment

KEYSTONE ENVIRONMENTAL RESOURCES, INC.

TABLE OF CONTENTS

PRODUCED ON 08/03/88 AT 10:38 PAGE
=====

SAMPLE #	SOURCE	DESCRIPT	DATE-COL	DATE-REC	ORD #
88070546	SOIL SAMPLE	TANK FARM AREA	07/22/88	07/25/88	M8807115

KEYSTONE ENVIRONMENTAL RESOURCES, INC.

=====

TABLE 1: SUMMARY OF ANALYTICAL DATA

PRODUCED ON 08/03/88 AT 10:39

PAGE

=====

=====

=====

AMPLE #	RSLT. LNE	SOURCE

SOLIDS		
8070546	% Solids @103 C..... : 92.6	SOIL SAMPLE
PENTACHLOROPHENOL		
8070546	PCP, ug/Kg..... : 1040000	SOIL SAMPLE

The above results are on an as received basis.

The Pentachlorophenol identification is from retention data only.

August 3, 1989

Mr. Platt Moore
GSX Services of SC, Inc.
Route 1
Pinewood, South Carolina 29125

Re: Beazer Materials & Services
ARF for Grenada, MS

Dear Mr. Moore:

Per your request of July 10, please make the following changes to the above-referenced ARF:

1. Please remove the references to inorganic solids on Page 2 under column heading "Solids and Inorganics."
2. Pentachlorophenol content by analysis 1040 PPM.
3. Please change our answer to Question 17, Page 4 concerning "First Third" from No to Yes.
4. Attached is joint completed EP tax results which we would like to make part of this ARF.

Sincerely yours,

Jack L. Stephenson
Purchasing Agent

JLS/mjg

Enclosure

cc: Mr. D. Kerschner - K-1450

**KOPPERS INDUSTRIES, INC.
GRENADA PLANT**

WORK ORDER # M89-07.47

KEYSTONE-MONROEVILLE



Phone: 412/825-9600

3000 Tech Center Dr., Monroeville, PA 15146

Fax: 412/825-9699

July 27, 1989

Koppers Industries, Inc.
1650 Koppers Building
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219

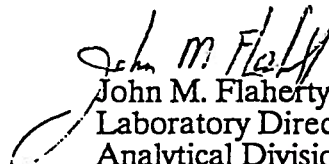
Attention Mr. Jack Stephenson

Dear Mr. Stephenson:

Thank you for selecting Keystone Environmental Resources, Inc. to carry out your recent sample analyses. We have completed the analyses that you requested and have enclosed a summary of the data for your review.

Your confidence in our service is appreciated. We look forward to serving you again.

Sincerely,


John M. Flaherty
Laboratory Director
Analytical Division of
Keystone Environmental Resources, Inc.

JMF/pb

Enclosures

cc: J. Campbell
S. Hartley

KEYSTONE ENVIRONMENTAL RESOURCES, INC.
CASE NARRATIVE

I GENERAL

A. WORK ORDER M89-07.47

B. SAMPLE NUMBERS 001

C. SHIPPING PROBLEMS No Chain-of-custody. _____

II ANALYSIS

A. ANALYSIS PROBLEMS None _____

COMMENTS None _____


PROJECT MANAGER

REPORT TO:
Beazer - Grenada
Keystone Consulting

WORK ORDER: M89-07.47
DATE RECEIVED: 12-JUL-1989
DATE REPORTED: 28-JUL-1989

ATTENTION: Jack Stephenson

PREPARED BY:
Keystone Environmental Resources
3000 Tech Center Drive
Monroeville, PA 15146
(412) 825-9600

PROJECT ID: 155000-02
P.O. NUMBER:

CERTIFIED BY :

Stephen F. Dwyer

Please call the above number if you have any questions regarding this Work Order. NOTE: All samples will be retained for 60 days. Unused soil and waste samples will be returned to you at no charge. Alternately, Keystone can make disposal arrangement for a fee.

Samples included in this report:

Keystone Sample ID	Client's Sample Name	Date Collected	Sample Matrix
M89-07.47-001	TANK FARM	10-JUL-1989	SOIL

Analyses and Descriptions referred to in this report.

Analysis ID	Parameter Description
EPTOX	EPTox As,Ba,Cd,Cr,Hg,Se,Ag,Pb
PCP	Pentachlorophenol (Koppers GC Method)

Summary of Analytical Results

Date received: 12-JUL-1989 Customer: Beazer - Granada Job name: M89-07.47

Samples

Keystone ID	47-001
Date Sampled	10-JUL-1989
Customer ID	TANK FARM

Parameters Units

EPTOX LEACHATE

PCP	ug/L	532
-----	------	-----

EPTOX METALS

Arsenic	mg/L	<0.100
Barium	mg/L	<0.200
Cadmium	mg/L	<0.005
Chromium	mg/L	<0.010
Mercury	mg/L	<0.0002
Lead	mg/L	<0.100
Selenium	mg/L	<0.100
Silver	mg/L	<0.010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

Certified Mail #
Return Receipt Requested

FEB 14 1991

Koppers Industries, Inc.
ATTN: Mr. J.D. Clayton, Plant Manager
P.O. Box 160, Tie Plant Road
Tie Plant, MS 38960

Dear Mr. Clayton:

The United States Environmental Protection Agency (EPA) is presently undertaking an initiative called the Accidental Release Information Program (ARIP). The purpose of this program is to learn more about the causes of accidental releases of hazardous substances from certain fixed facilities, and the actions which could be taken to prevent them from reoccurring.

We are currently investigating the circumstances surrounding the following hazardous substance releases:

<u>DATE</u>	<u>NRC ID#</u>	<u>Substance</u>	<u>Quantity</u>
12/23/88	21570	60/40 Creosote/Coal	200.00 gals.
3/15/90	12189	Creosote, Coal Tar	250.00 gals.
3/28/90	13067	Creosote, Coal Tar	200.00 gals.

Our investigation concerns the actions that have been taken as a result of the releases and the potential for future releases from this facility which may endanger public health, welfare or the environment.

Pursuant to the authority of Section 104 (b)(1) and (e), of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. Sections 9604(b)(1) and (e), you are requested to respond to the questions in the enclosed Accidental Release Prevention Questionnaire as they relate to the above referenced release of a hazardous substance. Your response shall include all information requested which is in your possession, custody or control, or which is in the possession, custody, or control of any of your employees, officers, or agents.

A separate questionnaire should be submitted for each release event identified above. You may reproduce the questionnaire locally, or you may submit a computer printout that provides the requested information in the identical format. Your response should be sent to EPA within thirty (30) calendar days of your receipt of this letter. Requests for a reasonable extension of time can be discussed with the Agency.

Page 2

You are entitled to assert a claim of business confidentiality, in accordance with 40 CFR §2.203(b), for any confidential business or trade secret information produced. Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 CFR Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

OFFICE OF MANAGEMENT & BUDGET (OMB) HAS EXTENDED THE APPROVAL PERIOD FOR THIS INFORMATION COLLECTION THROUGH APRIL 30, 1991.

Your completed response should be sent to:

Ms. Shirley Coverson, ARIP Coordinator
Title III Unit
U.S. EPA, Region IV
345 Courtland Street, NE
Atlanta, Georgia 30365

If you have any questions concerning this matter, please contact Shirley Coverson at 404/347-1033 ext. 42.

Sincerely yours,



Winston A. Smith, Director
Air, Pesticides & Toxics Management Division

Enclosure

cc: Mr. J.E. Maher, Chairman
Mississippi Emergency Response Commission

Mr. Charles H. Chisolm, P.E.
Director, Bureau of Pollution Control

**PETERSON
& ROSS**



Attorneys at Law
200 East Randolph Drive
Suite Number 7300
Chicago, Illinois 60601-6969
312 861-1400 Telephone
312 565-0832 Facsimile
25-4161 Telex

February 7, 1991

Mr. Sam Mabry
Mississippi Dept. of Natural Resources
P.O. Box 10385
Jackson, MS 39289-0385

Re: Grenada Tie Plant (Koppers) - Grenada, MS

Dear Mr. Mabry:

This letter is a formal request for the release of documents under the Freedom of Information Act ("FOIA").

I am requesting the following information, but not limited to:

1. Copies of any and all complaints, demands, requests or correspondence by either governmental agencies (federal or state) or private parties concerning potential soil, surface water or groundwater contamination arising from activities on the captioned site.
2. Copies of any investigation reports assessing hydrogeologic conditions at the site or summarizing any on-site and/or off-site groundwater or soil sampling results (including raw data and maps).
3. Copies of all lists which name potentially responsible parties at the captioned site or concern the volumetric allocation of responsibility for pollution for any responsible party.
4. Copies of any newspaper articles, personal files or any other documents relating to pollution on or near the captioned site.
5. Costs incurred to date and estimated future costs for investigation and/or remediation of pollution resulting from activities on the captioned site.

Before processing this request, please let me know the approximate amount of documents for the captioned site that are responsive to this request and the cost of copying the

**PETERSON
& ROSS**

Mr. Sam Mabry
January 7, 1991
Page 2

documents. If you have any questions regarding this request, please call me at (312) 861-1400, ext. 4145. Thank you for your assistance.

Sincerely,

PETERSON & ROSS

Tricia Grogan

Tricia Grogan
Legal Assistant

TG/cam
0031acam

DIVISION OF SOLID WASTE

REVIEWED BY TA

DATE _____

COMMENTS Called Ms

Grogan and explained
volume of copies & policy
regarding copying such volumes.



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

MEMORANDUM

① David D. ② Wendy ③ Joy ④ Terry ⑤ Beverly ⑥ F

TO: Bill Barnett, ~~John Files~~, Sam Mabry, Barry Royals,
Don Scott, Dwight Wylie

FROM: Charles Chisolm

SUBJECT: Copying Records for Others

DATE: March 6, 1990

1. All records will be copied in our offices. Therefore, records will not be sent out for copying.

- ★ → 2. We will not charge for up to 50 copies. However, for more than 50 copies, we will charge 25 cents/page beginning with the first page.

3. When convenient, we will make all copies; however, we will allow others to use our copier when we are busy.

★ → For unusually large requests, we may secure temporary help. In such a case the person requesting the copies will be required to reimburse us for the cost of the temporary person in addition to 25 cents/page.

If the copying is to be done by other than Bureau staff, it generally should be done between 12:00 noon and 1:00 p.m. or 4:00 to 5:00 p.m. ← ★

When others are making the copies we must have someone who is responsible for the file "in the vicinity".

4. All payments for copies should be received before copies are released. ← ★

5. Charges will not be made for copies for other governmental organizations.

I may make exceptions to this procedure when I determine it is in the public interest. In my absence, you may do the same.

CHC:els

Still charge
for DEQ-LW, DEQ-PS
and others if
their benefit and
not our public
records.



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

FEB 11 1991

February 8, 1991

VIA FACSIMILE &
FEDERAL EXPRESS

Mr. Thad Hopper
Hazardous Waste Division
State of Mississippi Department of
Environmental Quality
2380 Highway 80 West
Jackson, MS 39204

Re: Compliance Evaluation Inspection
Koppers Industries, Inc.
Tie Plant, Mississippi

Dear Mr. Hopper:

This letter provides a response to your January 22, 1991 correspondence regarding the Compliance Evaluation Inspection conducted by the Mississippi Department of Environmental Quality (MDEQ) at the above-referenced facility. Specific responses to the concerns outlined in your letter are provided below:

Comment 1:

MHWMR 264.14 and MHWMP 88-543-01, Attachment I and Appendix D: Failure to maintain security device. No signs posted or fence installed.

Response:

The fence surrounding the former surface impoundment was removed during closure and inadvertently not replaced when closure was completed. Within 60 days, a barbed wire fence, which will include a minimum of four strands of wire, will be reinstalled around the perimeter of the former surface impoundments. The appropriate signs will be posted following construction of the fence.

Comment 2:

MHWMR 264.15 and MHWMP 88-543-01 Attachment I, Appendix D: Failure to follow Post-Closure inspection form developed for Post-Closure core maintenance.

Mr. Thad Hopper
February 8, 1991
Page 2

Response:

Effective immediately, the post-closure inspection log sheet (copy attached) will be completed by plant personnel following the required monthly inspections. The completed inspection log sheets will be maintained in the plant files.

Soil Piles

Stockpiled soil at the facility is from two locations.

Soil stockpiled in the southern portion of the facility is the result of drip track construction activities at the plant. Specifically, Koppers Industries, Inc. (KII) made a business decision to install concrete drip tracks in front of their wood preserving process area. Excavation of soil was necessary for this construction. This project was considered environmentally beneficial from the continuing operations standpoint as future potential incidental drippage will be intercepted and infiltration of precipitation will be mitigated thereby preventing any leaking of residual constituents in the soil underlying the area.

This activity was initiated in October 1990 and completed in February 1991. Approximately 4000 tons of this soil is stockpiled from this excavation at the former waste treatment system area (SWMU 11). The soil was segregated into piles which are considered visibly impacted (1000 tons) and visibly clean (3000 tons) and stored on plastic on an interim basis. These soil piles will be covered with plastic in the near future.

Analytical data to characterize this material is provided in the report entitled "Soil and Groundwater Investigation of Solid Waste Management Units (SWMUs) (Keystone 1989) based on sampling and analysis from this area. The Toxicity Characteristic Leaching Procedure (TCLP) was not performed on this soil. However, TCLP results available from drip track soils at 7 other facilities indicate that this material is non-hazardous. These data can be supplied, if requested.

Soil stored in the south yard under the lumber shed is from excavations from under the creosote work tanks. Approximately 1000 tons of soil are present at this location. This soil has been stockpiled since October 1988.

Although we have indications that this material has been sampled for parameters other than TCLP analyses in the past, Beazer East, Inc. does not have this data available. Once this data is

Mr. Thad Hopper
February 8, 1991
Page 3

located, we will forward this information to you.

To further characterize the material stockpiled under the lumber shed, sampling and analysis will be completed as part of the Phase II RFI. On composite soil sample will be collected for every 500 tons of stockpiled soil. The soil will be analyzed for the parameters provided in Table 5-1 of the RCRA Facility Investigation Phase II Work Plan (Keystone, 1990) in addition to TCLP analyses.

Remediation of this material will be incorporated into the overall corrective action to be conducted at the facility. This soil will be considered in the Corrective Measures Study (CMS) which will be initiated following completion of the RFI. The CMS will evaluate, develop, and recommend corrective action alternatives to address this soil, in addition to other potentially impacted soils, if necessary.

If you have any questions or comments, please call me at 412/227-2185.

Sincerely,


Jane M. Patarcity
Program Manager-Environmental Services

/lpd

cc: B. Nolan
M. Hansen
R.G. Hamilton
R. Clayton - KII
S. Smith - KII
J. Batchelder - KII

POST-CLOSURE INSPECTION LOG SHEET

Inspector's Name/Title _____
 Date of Inspection _____
 Time of Inspection _____ (month/day/year)



Item	Types of Problems	Status ()		Date and nature of repairs/remedial action
		Acceptable/Unacceptable	Observations	
Backfilled Cover	Depressions, cracks or erosion			
Final Vegetative Cover	Depressions, cracks or erosion and barren spots, grass cutting			
Benchmarks	Deterioration, cracks or depression			
Groundwater Monitoring Wells	Concrete collar needs replaced, signs of cracks, replacement of exposed casing and cap			
Security	Fence broken or deteriorated			
Run-off/Run-on	Water Ponding			
Signs	Detroyed or damaged			

FEB-08-1991 16:55 FROM

BEAZER ENVIRONMENTAL

TO

96013546612

P.01

Beazer East, Inc.
Environmental Services
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer

FAX COVER SHEET

PLEASE FORWARD FAX TO:

Thad Hopper

FAX NUMBER:

601/354-6612

FROM:

Jane Patarcity

Beazer East, Inc.
FAX Number: (412) 227-2950

Number of pages to follow:

34

Comments:

If you have any questions regarding this fax, please call
Lauren Denny at (412) 227-2961.

Thank you for your help in distributing this fax!!!



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

February 8, 1991

VIA FACSIMILE &
FEDERAL EXPRESS

Mr. Thad Hopper
Hazardous Waste Division
State of Mississippi Department of
Environmental Quality
2380 Highway 80 West
Jackson, MS 39204

Re: Compliance Evaluation Inspection
Koppers Industries, Inc.
Tie Plant, Mississippi

Dear Mr. Hopper:

This letter provides a response to your January 22, 1991 correspondence regarding the Compliance Evaluation Inspection conducted by the Mississippi Department of Environmental Quality (MDEQ) at the above-referenced facility. Specific responses to the concerns outlined in your letter are provided below:

Comment 1:

MHWMR 264.14 and MHWMP 88-543-01, Attachment I and Appendix D: Failure to maintain security device. No signs posted or fence installed.

Response:

The fence surrounding the former surface impoundment was removed during closure and inadvertently not replaced when closure was completed. Within 60 days, a barbed wire fence, which will include a minimum of four strands of wire, will be reinstalled around the perimeter of the former surface impoundments. The appropriate signs will be posted following construction of the fence.

Comment 2:

MHWMR 264.15 and MHWMP 88-543-01 Attachment I, Appendix D: Failure to follow Post-Closure inspection form developed for Post-Closure core maintenance.

Mr. Thad Hopper
February 8, 1991
Page 3

located, we will forward this information to you.

To further characterize the material stockpiled under the lumber shed, sampling and analysis will be completed as part of the Phase II RFI. On composite soil sample will be collected for every 500 tons of stockpiled soil. The soil will be analyzed for the parameters provided in Table 5-1 of the RCRA Facility Investigation Phase II Work Plan (Keystone, 1990) in addition to TCLP analyses.

Remediation of this material will be incorporated into the overall corrective action to be conducted at the facility. This soil will be considered in the Corrective Measures Study (CMS) which will be initiated following completion of the RFI. The CMS will evaluate, develop, and recommend corrective action alternatives to address this soil, in addition to other potentially impacted soils, if necessary.

If you have any questions or comments, please call me at 412/227-2185.

Sincerely,


Jane M. Patarcity
Program Manager-Environmental Services

/lpd

cc: B. Nolan
M. Hansen
R.G. Hamilton
R. Clayton - KII
S. Smith - KII
J. Batchelder - KII

POST-CLOSURE INSPECTION LOG SHEET

Inspector's Name/Title _____
Date of Inspection _____
Time of Inspection _____
(month/day/year)

Item	Types of Problems	Status () Acceptable/Unacceptable	Observations	Date and nature of repairs/remedial action
Backfilled Cover	Depressions, cracks or erosion			
Final Vegetative Cover	Depressions, cracks or erosion and barren spots, grass cutting			
Benchmarks	Deterioration, cracks or depression			
Groundwater Monitoring Wells	Concrete collar needs replaced, signs of cracks, replacement of exposed casing and cap			
Security	Fence broken or deteriorated			
Run-off/Run-on	Water Ponding			
Signs	Destroyed or damaged			



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

January 28, 1991

FEDERAL EXPRESS

Mr. Thad Hopper
Mississippi Department of Environmental
Quality
2380 Highway 80 West
Jackson, MS 39204

Re: Compliance Evaluation Inspection
Koppers Industries, Inc.
Grenada Mississippi Facility

Dear Mr. Hopper:

This letter requests a 7-day extension for submission of the response to your January 22, 1991 correspondence regarding the Compliance Evaluation Inspection at the above-referenced facility. This extension is requested to adequately address the concerns provided in your letter.

Your assistance in this matter is appreciated. If you have any questions, please call me at 412/227-2185.

Sincerely,

Jane M. Patarcity
Program Manager-Environmental Services

/lpd

cc: M. Hansen
J.D. Clayton - KII
J. Batchelder - KII

DIVISION OF SOLID WASTE

REVIEWED BY Thad Hopper

DATE Jan 29, 1991

COMMENTS Approved Extension

on conversation with J. P. on
Jan 28, M. H. B. to EPA.



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

January 11, 1991

Ms. Gail Macalusa
Mississippi Department of Natural
Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Re: SWMU Closure Plan - Sprayfield
Koppers Industries, Inc.
Grenada, MS Facility

Dear Ms. Macalusa:

This letter provides a schedule for initiation of the closure plan for the sprayfield at the above-referenced facility.

As indicated in the closure plan submitted to you on October 9, 1990, closure will be scheduled to coincide with the onset of the active vegetative growing season. These warmer weather conditions are needed to enhance natural biodegradation. Thus, closure activities will be initiated on April 1, 1991.

Please call me at 412/227-2185 if you have any questions or comments.

Sincerely,

Jane M. Patacity
Program Manager-Environmental Services

/lpd

cc: J. Clayton - KII
J. Batchelder - KII
R. Haimann- D&M
B. Nolan
T. Hopper - MSDNR

Beazer East, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer



September 11, 1990

FEDERAL EXPRESS

Ms. Gail Macalusa
Hazardous Waste Division
Mississippi Department of Natural
Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Re: Koppers Industries, Inc.
Grenada, Mississippi
Surface Impoundment - Post-Closure
Detection Monitoring Program
MSD 007 027 543

Dear Ms. Macalusa:

On June 28, 1988, Koppers Company, Inc. was issued a Hazardous Waste Permit (No. 88-543-01) for the facility located in Grenada, Mississippi. This permit was modified on February 23, 1990, to include additional constituents for the detection monitoring program as part of post-closure core requirements. In Part IV.F.1 of the permit, the Behrens-Fisher student t-test is to be used for statistical comparisons. An examination of the Grenada data shows that most of the upgradient and downgradient well measurements are below the detection limits for each of the original five permit constituents (naphthalene; acenaphthalene; fluoranthene; 2, 4-dinitrophenol; and pentachlorophenol). Therefore, a background mean value cannot be determined and the Behrens-Fisher method cannot be appropriately utilized.

Because of the high number of non-detects in the Grenada groundwater monitoring data, the following two documents, prepared by Dr. William R. Kodrich, Clarion University of Pennsylvania, are enclosed for your consideration:

1. Results of statistical analyses of data for the original five parameters specified in the KII Grenada Hazardous Waste Permit issued to KII's Grenada facility.
2. Recommended statistical procedures for comparing mean background well concentrations with mean downgradient compliance well concentrations at KII's Grenada facility.

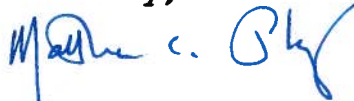
Ms. Gail Macalusa
September 11, 1990
Page 2

Dr. Kodrich has presented several statistical methods to be used under various monitoring data situations (e.g., the percentage of non-detects). These methods are included in those recommended in the United States Environmental Protection Agency's (EPA) guidance document, Statistical Analysis of Ground Water Monitoring Data at RCRA (Resource Conservation and Recovery Act) Facilities, Interim Final Guidance (EPA Guidance Document, February 1989) and meet the substantial requirements of MHWMR 264.

As operator of the unit, Beazer East, Inc. requests the approval by the MSDNR for use of the statistical methods presented by Dr. Kodrich in the attached documents for the surface impoundment post-closure detection monitoring program at KII's Grenada facility (see Part IV.F.1). We believe that this statistical program is more appropriate for the Grenada facility.

If you have any questions, please call me at 412/227-2952.

Sincerely,



Matthew C. Plautz, P.E.
Program Manager-Environmental Services

/lpd
Enclosures

cc: B.S. Nolan
J.D. Clayton - KII
J. Batchelder - KII
D. King - KER



CLARION UNIVERSITY
of Pennsylvania

Clarion, Pennsylvania 16117

August 29, 1990

RECEIVED

SEP 4 1990

KEYSTONE ENVIRONMENTAL
RESOURCES, INC.

RECOMMENDATIONS:

Koppers Industries, Inc.
Grenada, MS, Plant

Statistical procedures for comparing mean background well concentrations with mean compliance well concentrations for:

napthalene
acenaphthalene
fluoranthene
pentachlorophenol
2,4-dinitrophenol
2,3,4,6-tetrachlorophenol
2,4,6-trichlorophenol
2,4-dichlorophenol
2,4-dimethylphenol
2-chlorophenol
2-nitrophenol
2-methyl-4,6-dinitrophenol
4-nitrophenol
4-chloro-3-methylphenol
phenol
acenaphthene
benzo(a)anthracene
benzo(a)pyrene
benzo(b)fluoranthene
benzo(g,h,i)perylene
benzo(k)fluoranthene
chrysene
dibenz(a,h)anthracene
fluorene
phenanthrene
indeno(123-cd)pyrene
pyrene
bis(2-ethylhexyl)phthalat
chromium
mercury

The methods recommended are those recommended in the EPA guidance document Statistical Analysis of Ground-Water Monitoring Data at RCRA (Resource Conservation and Recovery Act) Facilities, Interim Final Guidance (EPA Guidance Document, Feb 89).

PREPARED BY:

William R. Kodrich, Ph. D.
Professor of Biology

Mean background well concentrations for each constituent will be compared with mean compliance well concentrations for each constituent. The procedures recommended here meet the requirements of MHWMR 264.

Recommendations for statistical methods are based on two major categories of collected data: 1) data containing 50% or more of nondetects, and 2) data containing less than 50% nondetects or no nondetects.

Data Containing 50% or more Nondetects:

If 50% or more of the determinations are nondetects, and 10% of the observations are above the detection limit, the Test of Proportions will be utilized (see EPA Guidance Document, Feb 89). It should be noted that this method requires a minimum of five (5) detectable values to be valid. If there are less than five values, a Poisson method will be applied.

Data Containing Less Than 50% Nondetects or No Nondetects:

If the observations contain between 15% and 50% nondetects, we will treat the nondetects as ties and proceed with a nonparametric analysis of variance (ANOVA). The recommended nonparametric method is the Kruskal-Wallis Test (Sokal and Rohlf, 1981). There will be at least three wells compared over at least three quarters.

Quarter	Well R-10	Well R-7	Well R-9
1st, 1990	-	-	-
2nd, 1990	-	-	-
3rd, 1990	-	-	-

Each (-) represents a well value for a given date. If significance is found, the Simultaneous Test Procedure of Dwass (Sokal and Rohlf, 1981) for multiple comparisons will be employed.

If there are only two groups, the Mann-Whitney U-Test or Wilcoxon Test for nonparametric comparison of two samples will be used. This method permits the comparison of one up gradient well with one down gradient well.

For the situations where 15% or less of the observations are nondetects, the preferred method is the parametric analysis of variance (ANOVA). If there are nondetects, they are replaced with one-half of the minimum detection limit. Two requirements must be met before applying the parametric ANOVA method: 1) observations must

be normally distributed, and 2) the group variances must be homogeneous.

If both assumptions are met, we will proceed with a one-way ANOVA (Sokal and Rohlf, 1981). If there are only two wells to be compared, the one-way ANOVA is equivalent to a t-test. In the case of comparing the means of three or more wells, if the means are found to be significantly different a multiple range test will be employed. The Student-Newman-Keuls Multiple Range Test is recommended (Sokal and Rohlf, 1969).

Before proceeding with the ANOVA, data will be tested for normality. A straight forward method is to calculate the statistics of skewness (g_1) and kurtosis (g_2). The Null hypotheses of $g_1 = 0$ and $g_2 = 0$ will be tested with the t-test (Sokal and Rohlf, 1969, 1981).

If the data fail the test of normality, the observations will be transformed by taking their natural logarithms. The test of normality is then repeated on the transformed data.

If untransformed or transformed data fail the test for normality, the data will be subjected to the nonparametric Kruskal-Wallis test referred to above.

If the data satisfy the assumption of normality, the data will be subjected to Bartlett's test for homogeneity of variances will be employed. If the variances within groups are found to be heteroscedastic the nonparametric Kruskal-Wallis test will be used.

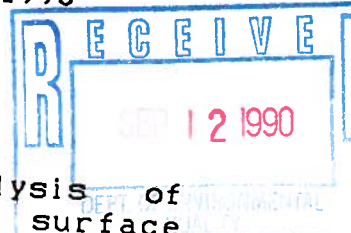
References

- Sokal, Robert R. and F. James Rohlf. 1969. Biometry. First Edition. W. H. Freeman and Company. San Francisco.
- Sokal, Robert R. and F. James Rohlf. 1981. Biometry. Second Edition. W. H. Freeman and Company. San Francisco.

August 29, 1990

RE:

1. Koppers Industries, Inc.
Grenada, MS, Plant
2. Recommendations for statistical analysis of detection monitoring program for surface impoundments with proportion of nondetects >50%.
3. Results of statistical analyses of data for 2,4-dinitrophenol, pentachlorophenol, fluoranthene, acenaphthylene, and naphthalene.



PREPARED BY:

William R. Kodrich, Ph. D.
Professor of Biology

In general, the permit recommends guidelines presented in the guidance document Statistical Analysis of Ground-Water Monitoring Data at RCRA (Resource Conservation and Recovery Act) Facilities, Interim Final Guidance (EPA Guidance Document, Feb 89).

Examination of the Grenada data shows that most background (up gradient) well measurements are below the detection limit. For each of the parameters examined, one value in one of the six compliance wells is above the detection limit.

Condition IV.E.2 of the permit says "The Permittee shall establish a background mean value for each constituent listed in Condition IV.E.1 based on at least quarterly sampling of wells R-10...." In Condition IV.F.1, the permits says "The Permittee shall use the Behrens-Fisher student's t-test as described in Appendix IV of MHWMR Part 264 or an equivalent method approved by the Executive Director or the Department of Natural Resources to determine if concentrations exceed the groundwater protection standards of this permit."

Since almost all of the background (up gradient) well values are below the detection limit for each constituent, a background mean value cannot be determined and the Behrens-Fisher method cannot be utilized.

The permit recognizes that concentrations at or below the detection limit may be obtained as in the case of the data for the five constituents (2,4-dinitrophenol, pentachlorophenol, fluoranthene, naphthalene and acenaphthylene) you have provided to me. The permit says in Condition IV.F.2 "When the concentration of a constituent is reported by the laboratory as not detected or below the minimum detection limit, the Permittee shall use the minimum detection limit value reported for that constituent in evaluation monitoring results." The permit is not clear in

establishing how the minimum detection limit will be used in monitoring results.

However, in the EPA Guidance Document (Feb, 1989), when the number of nondetects in up gradient and down gradient wells is very high (well over 50%) a proportions method or a Poisson application is recommended. In the case of the Grenada data, the Poisson method is recommended for analyzing the data for all constituents.

The application of the Poisson method that I have utilized is well documented in many references such as Goldstein, 1964, and Runyon, 1985.. The results of the application of the Poisson method to each parameter follows. A level of significance (Type I error rate) of 1% was utilized.

The table for 2,4-dinitrophenol shows that all background well measurements (R-10, R-1R) were below the detection limit. Five of the compliance wells (R-8, R-8B, R-9, R-9C, R-9D) had all measurements below the detection limit. Compliance well R-7 had one value above the detection limit. Application of the Poisson method comparing the monitoring results of well R-10 and well R-7 indicate that there is no evidence of contamination in well R-7.

For the table for pentachlorophenol, all background well values (wells R-10, R-1R) were below detection limits. All measurements for compliance wells R-7, R-8, R-8B, R-9, and R-9C were below detection limits. In compliance well R-9D, one measurement was recorded above the detection limit. Application of the Poisson distribution indicates that there is no evidence of contamination in well R-9D.

Similar results are seen for fluoranthene. All but one up gradient well values (wells R-10, R-1R) are below the detection limit. Compliance well values (wells R-7, R-8B, R-9, R-9C, R-9D) are below the detection limit. In compliance well R-8, one value is above the detection limit. Application of the Poisson distribution method indicates there is no evidence of contamination in this well.

The data for acenaphthylene shows that all background well data (wells R-10, R-1R) are below the detection limit. Only one compliance well (R-7) has a value exceeding the detection limit. Application of the Poisson distribution method indicates that there is no evidence of contamination in this well.

The value 24.8 micrograms/liter found for acenaphthylene appears to be the result of a laboratory error in determining the concentration of this parameter.

There is insufficient data to test for an outlier. However, in light of all the other measurements taken for this parameter, this one value looks very suspicious. This value is probably a technical error in determining the concentration.

Finally, the data for naphthalene shows that all background well data (wells R-10, R-1R) are below the detection limit. Only one compliance well (well R-9) has a concentration above the detection limit. Application of the Poisson method indicates that there is no evidence of contamination in this well.

Goldstein, Avram. 1964. Biostatistics. The MacMillan Company. New York. 272 pp.

Runyon, Richard P. 1985. Fundamentals of Statistics in the Biological, Medical and Health Sciences. Duxbury Press. Boston. 393 pp.

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 QUARTERLY MONITORING
 FOR RCRA SURFACE IMPOUNDMENT

PARAMETER: NAPHTHALENE (ug/l)

Well #	1988		1989				1990 1st Qtr. (1/19)
	3rd Qtr. (7/26)	4th Qtr. (9/27)	1st Qtr. (2/13)	2nd Qtr. (6/22)	3rd Qtr. (9/20)	4th Qtr. (12/14)	
R-10	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00
R-1R	NI	NI	NI	NI	<2.00	<2.00	<2.00
R-7	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00
R-8	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00
R-8B	<2.00	<2.00	<2.00	<2.00	---	<2.00	<2.00
R-9	<2.00	<2.00	<2.00	<2.00	2.41	<2.00	<2.00
R-9C	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00
R-9D	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00

NI - Not installed until March 1989.

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 QUARTERLY MONITORING
 FOR RCRA SURFACE IMPOUNDMENT

PARAMETER: ACENAPHTHALENE (ug/l)
 (acenaphthylene)

Well #	1988		1989				1990
	3rd Qtr. (7/26)	4th Qtr. (9/27)	1st Qtr. (2/13)	2nd Qtr. (6/22)	3rd Qtr. (9/20)	4th Qtr. (12/14)	1st Qtr. (1/19)
R-10	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00
R-1R	NI	NI	NI	---	<2.00	<2.00	<2.00
R-7	<2.00	<2.00	<2.00	<2.00	<2.00	24.8	<2.00
R-8	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00
R-8B	<2.00	<2.00	<2.00	<2.00	---	<2.00	<2.00
R-9	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00
R-9C	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00
R-9D	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00	<2.00

NI - Not installed until March 1989.

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 QUARTERLY MONITORING
 FOR RCRA SURFACE IMPOUNDMENT

PARAMETER: FLUORANTHENE (ug/l)

Well #	1988		1989			1990
	3rd Qtr. (7/26)	4th Qtr. (9/27)	1st Qtr. (2/13)	2nd Qtr. (6/22)	3rd Qtr. (9/20)	1st Qtr. (1/19)
R-10	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200
R-1R	NI	NI	NI	---	<0.200	<0.200
R-7	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200
R-8	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200
R-8B	<0.200	<0.200	<0.200	<0.200	0.214	<0.200
R-9	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200
R-9C	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200
R-9D	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200

NI - Not installed until March 1989.

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 QUARTERLY MONITORING
 FOR RCRA SURFACE IMPOUNDMENT

PARAMETER: 2,4-DINITROPHENOL (ug/l)

Well #	1988		1989				1990
	3rd Qtr. (7/26)	4th Qtr. (9/27)	1st Qtr. (2/13)	2nd Qtr. (6/22)	3rd Qtr. (9/20)	4th Qtr. (12/14)	1st Qtr. (1/19)
R-10	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-1R	NI	NI	NI	---	<1.00	<1.00	<1.00
R-7	1.32	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-8	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-8B	<1.00	<1.00	<1.00	<1.00	---	<1.00	<1.00
R-9	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-9C	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-9D	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00

NI - Not installed until March 1989.

KOPPERS INDUSTRIES, INC.
 GRENADA, MS PLANT
 QUARTERLY MONITORING
 FOR RCRA SURFACE IMPOUNDMENT

PARAMETER: PENTACHLOROPHENOL (ug/l)

Well #	1988		1989				1990
	3rd Qtr. (7/26)	4th Qtr. (9/27)	1st Qtr. (2/13)	2nd Qtr. (6/22)	3rd Qtr. (9/20)	4th Qtr. (12/14)	1st Qtr. (1/19)
R-10	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-1R	NI	NI	NI	---	<1.00	<1.00	<1.00
R-7	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-8	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-8B	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-9	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-9C	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00
R-9D	<1.00	<1.00	<1.00	<1.00	<1.00	1.38	<1.00

NI - Not installed until March 1989.



Koppers
Comp. #1

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
RAY MABUS
GOVERNOR

FILE COPY

September 10, 1990

Mr. Wayne E. Carlin
Route 2
Stryker, Ohio 43557

Dear Mr. Carlin:

Re: Beazer East, Inc.
Grenada, MS Facility

Beazer East, Inc., former owner of the Koppers Wood Preserving facility in Grenada, Mississippi, is the operator of a closed boiler ash disposal area located adjacent to a portion of the facility's east property line. This area was formerly used to dispose of ash generated from the burning of wood and wood wastes mixed with fuel additives. Some of the fuel-additive materials burned in the past, are now classified as hazardous wastes, and the ash generated is also a hazardous waste. In December, 1987, in compliance with an Administrative Order issued by the Mississippi Department of Environmental Quality, Beazer installed four groundwater monitoring wells around their boiler ash disposal area. Well M-1 is located hydraulically upgradient from the disposal area. Wells M-2, M-3, and M-4 are located hydraulically downgradient from well M-1, between the disposal area and the property boundary. Analytical results have indicated the presence of pentachlorophenol, as well as many other hazardous constituents associated with wood preserving processes, in significant concentrations in the groundwater samples from wells M-2, M-3, and M-4. Because your property is located hydraulically downgradient from the ash disposal area, there is reason to believe the contaminants have migrated in the groundwater beyond the facility boundary and under your property.

According to the Resource Conservation and Recovery Act (RCRA) of 1976, Beazer must assess the extent of groundwater contamination beyond their facility boundary, and remediate the groundwater to levels considered to be safe to human health and the environment.

Beazer has informed us that they have attempted to secure access to your property for the drilling and installation of monitoring wells. They have indicated your hesitance to reach a formal agreement due to concern of interference with farming practices. Beazer also indicated they could locate the proposed monitoring wells along an existing grass access road to avoid interference with farm operations.

We can appreciate your apprehension regarding this matter; however, if the groundwater beneath your property is indeed contaminated, it should be assessed and controlled as soon as possible to prevent further contamination. If we can be of any assistance in expediting the process or in addressing questions or concerns you may have, please call me at (601) 961-5171.

Sincerely,



Gail Macalusa
Hazardous Waste Division

GM-13:lr

pc: Mr. Matthew C. Plautz



Phone: 412/825-9600

3000 Tech Center Dr., Monroeville, PA 15146

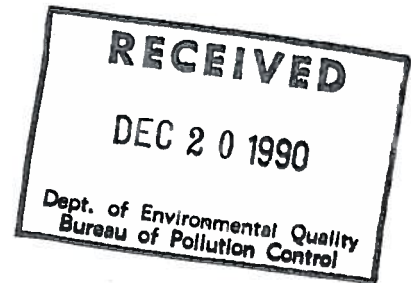
Fax: 412/825-9699

Ref. No. 176999-04

December 17, 1990

Bureau of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39289-0385

Attn: J. Thad Hopper



Enclosed are the field data sheets you requested from Grenada Mississippi. As noted on the data sheets, wells R-16 R-20 R-25 had product on the bottom. Well R-6 is damaged at 4.60 feet and water depth cannot be reached.

You had also asked if any of the wells went dry, and at that time I said no. But wells R-10A and M-2 did go dry but recovered well. At the next sampling round they may not go dry again.

If you should have any further questions, please feel free to contact me at (412) 825-9673 or the Project Manager, Dave King at (412) 825-9609.

Very truly yours,

Brian V. Blacka
Field Services

BVB:erh H-076

KEYSTONE ENVIRONMENTAL RESOURCES, INC.
FIELD DATA SHEET FOR GROUNDWATER SAMPLING

PLANT: KOPPERS, GRENADA, MISSISSIPPI		DATE OF WATER LEVELS: 12-10, 12-11-90		SAMPLED BY: BRIAN BLACKA KENSCHLEPER						
PROJECT: 4TH QTR RCRA 176999-04		DATE OF SAMPLING: 12-11-90		WEATHER: SUNNY MID 60'S						
SAMPLING METHOD: BOTTOM FILLER BAILERS										
Site No.	Time	Well Dia. (in.)	Depth of Well (ft) (including stickup)	Depth to H ₂ O in Well (ft)	Number of Bails Removed	Dry at Number of Bails Removed	In-situ Measurements			
							pH (units)	Conductivity (umhos/cm)	Temp. (C°)	
R-1R	14:45	2	32.37	25.02	7.35	32	—	5.48	221	19°
R-7	11:30	2	31.55	25.46	6.09	26		5.82	240	18°
R-8	12:05	2	31.13	28.06	3.07	13		5.68	385	16°
R-8B	12:40	2	49.00	24.09	24.91	108		6.16	229	16°
R-9	13:25	2	32.20	27.07	4.18	18		5.85	183	16°
R-9C	13:40	2	65.00	25.64	39.36	171		5.62	209	15°
R-9D	13:45	2	91.30	26.29	65.01	282		5.73	230	16.5°
R-10A	16:26	2	30.55	19.64	10.91		38	6.57	205	17°
FIELD B.	08:00							7.65		
TRIP B.								7.66		

OBSERVATIONS

R-1R	PARK BROWN & TURBID
R-7	LIGHT BROWN
R-8	LIGHT BROWN
R-8B	CLEAR SEWER LIKE ODOR @ FIRST & THEN LIGHT GREY NO ODOR @ SAMPLING TIME
R-9	YELLOWISH-BROWN TURBID
R-9C	LIGHT BROWN ⁵⁵ TURBID CLOUDY
R-9D	CLEAR
R-10A	DARK BROWN & TURBID (FAST RECOVERY)

10% B310 8040 Taken on this well

[illegible]

SITE NO.	OBSERVATIONS
M-1	YELLOWISH-BROWN & TURBID
M-2	DRY @ 21 BAILS, RECOVERED FAST, BOTTOM FILL STUCK @ ~5', USE TOP FILL TO SAMPLE, LT BROWN
M-3	LIGHT BROWN
M-4	DK. BROWN & VERY TURBID

KEYSTONE ENVIRONMENTAL RESOURCES, INC.
FIELD DATA SHEET FOR GROUNDWATER SAMPLING

PLANT: KOPPERS GRENADA MISSISSIPPI				DATE OF WATER LEVELS: 12-10 & 12-11-90				SAMPLED BY: BRIAN BLACKA & KEN SCHLIEFER			
PROJECT: 176999-04				DATE OF SAMPLING: SAMPLING METHOD:				WEATHER: SUNNY & MID 60'S			
				WATER LEVELS ONLY							
Site No.	Time	Well Dia. (in.)	Depth of Well (ft) (including stickup)	Depth to H ₂ O in Well (ft)	Number of Bails Removed	Dry at Number of Bails Removed	pH (units)	In-situ Measurements		Temp. (C°)	
								Conductivity (umhos/cm)			
R-12B				15.35							
R-12				14.95							
R-16				13.68	layer	on Bottom					
R-23				15.52							
R-21				24.02							
R-20				26.28	Sinking layer	28 thick on Bottom					
R-13				30.48							
R-18				26.99							
R-5				25.94							
R-5B				26.05							
R-2				23.58							

SITE NO.	OBSERVATIONS
R-6	well KINKED @ 4.6 cannot get interface past this point
R-3	21.54
R-11	18.33
R-4	20.63
SF-2	25.03
SF-1	25.47
SF-3	24.88
R-28	16.43
R-29	15.48
R-27	26.62
R-74	21.00

KEYSTONE ENVIRONMENTAL RESOURCES, INC.

PLANT: KOPERS GRENADA MISSISSIPPI		DATE OF WATER LEVELS: 12-10 & 12-11-90		SAMPLED BY: BRIAN BLACKBURN & KEN SETHURER					
PROJECT: 170999-04		DATE OF SAMPLING: SAMPLING METHOD:		WEATHER: SUNNY & MID 60S					
WATER LEVELS ONLY									
Site No.	Time	Well Dia. (in.)	Depth of Well (ft) (including stickup)	Depth to H ₂ O in Well (ft)	Number of Bails Removed	Dry at Number of Bails Removed	In-situ Measurements		Temp. (C°)
							Depth of H ₂ O in Well (ft)	Conductivity (umhos/cm)	
R-26				23.96					
R-10B				22.63					
R-19				22.97					
R-22				22.06					
R-31				26.76					
R-17				27.00					
SF-4	could not find								
R-30				23.76					
M-2B				27.23					
M-5A				22.17					
M-5B				27.41					

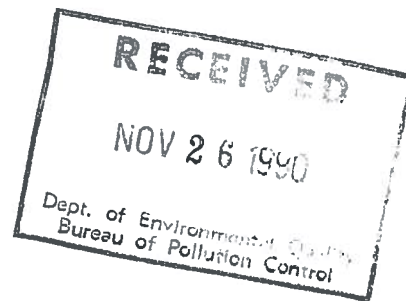


Beazer



Koppers

BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA



November 20, 1990

Ms. Gail Macalusa
Mississippi Department of
Natural Resources
Bureau of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Re: Koppers Industries, Inc.
Grenada, MS Facility
MSD 007027543

Dear Ms. Macalusa:

Please be advised that there is a change in the technical contact for Beazer East, Inc. regarding the above-referenced facility. Ms. Jane M. Patarcity is the Program Manager and may be reached at the following address:

436 Seventh Avenue
Suite 1450
Pittsburgh, PA 15219-1822
412/227-2185

Please call me at 412/227-2952 if you have any questions. I will have other responsibilities within Beazer East, Inc., but will be available to assist or address any questions, if necessary.

Sincerely,

Matthew C. Plautz

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

/lpd

cc: B. Nolan
R. Hamilton
J. Batchelder - KII
J. Clayton - KII
S. Spengler - MSDNR

ESW Sampling -



BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA

November 20, 1990

Mr. Steven O. Jenkins, Chief
RCRA Compliance Branch
Land Division
Alabama Department of Environmental
Management
1751 Cong. W.L. Dickenson Drive
Montgomery, AL 36130

Re: Administrative Order No: 90-057-HW
Koppers Industries, Inc.
Montgomer, AL Facility

Dear Mr. Jenkins:

Please be advised that there is a change in the technical contact for Beazer East, Inc. regarding the above-referenced facility. Ms. Jane M. Patarcity is the Program Manager and may be reached at the following address:

436 Seventh Avenue
Suite 1450
Pittsburgh, PA 15219-1822
412/227-2185

Please call me at 412/227-2952 if you have any questions. I will have other responsibilities within Beazer East, Inc., but will be available to assist or address any questions, if necessary.

DIVISION OF SOLID WASTE

REVIEWED BY TH
DATE Dec 3
COMMENTS mailed to
Pat Anderson EPA

Sincerely,

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

/lpd

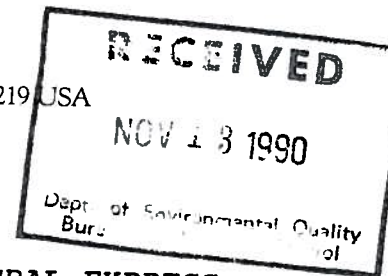
cc: B. Nolan
R. Hamilton
D. Meadows - KII
J. Batchelder - KII
F. Keith Clark - ADEM
D. Malaier - ADEM
S. Spengler - MSDNR

825-9609 (4/2)
David King

Koppers Industries 9

Beazer

BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA



November 9, 1990

FEDERAL EXPRESS

DIVISION OF SOLID WASTE

REVIEWED BY AM

DATE _____

COMMENTS sent to

EPA 11/16/90

Ms. Gail Macalusa
Mississippi Department of Natural
Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Re: Groundwater Monitoring
Koppers Industries, Inc.
Grenada, MS Facility
MSD 007 027 543

Dear Ms. Macalusa:

As you will recall, we informed you of a laboratory transcription error involving Appendix IX data results from the June 20-22, 1989 second quarter sampling event for the Grenada boiler ash landfarm. We detailed the cause and effect of the data manipulation error to you in a May 3, 1990 letter. Also included was documentation of the error and explanatory attachments from our consultant, Keystone Environmental Resources, Inc.

It was stated that Keystone would revise the affected Section 3.0 of the 1989 RCRA Annual Groundwater Monitoring Summary for the Grenada facility to discuss the additional detected Appendix IX parameters. This revision has been completed and the replacement Section 3.0 and Table of Contents are enclosed.

Please call if you have any questions or comments.

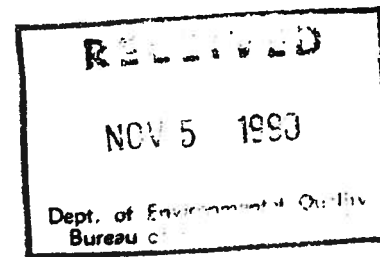
Sincerely,

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

/lpd

cc: B. Nolan
J. Batchelder - KII
J. Clayton - KII
D. King - KER
M. Urbassik - KER
S. Spengler - MSDNR

BEAZER EAST, INC., 436 SEVENTH AVENUE, PITTSBURGH, PA 15219 USA



November 2, 1990

Mississippi Department of Environmental Quality
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39289-0385

Attn: Gail Macalusa

Dear Gail:

Confirming our telephone conversation of Friday, November 2, I am enclosing a corrected copy of the Chief Financial Officer's letter and supporting documentation. I have also enclosed a new copy of the Closure/Post-Closure Cost Estimate worksheet.

The post-closure cost estimate for the Grenada facility has been increased by \$ 10,779 reflecting a change in the inflation factor from 1.0378 (supplied by RCRA Hotline) to 1.041 as reported by your agency.

Please feel free to contact me at (412) 227-2821 if you require additional information.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Russell S. Vorpe".

Russell S. Vorpe
Environmental Department
Regulatory Compliance Section

Enclosures



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

October 15, 1990

Certified Mail No. P 444 543 360

Mr. Matthew C. Plautz, P.E.
Program Manager
Environmental Services
Beazer East, Inc.
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219

Dear Mr. Plautz:

Re: 1990 Cost Estimate
Part A application
Koppers Industries, Inc.
Grenada, Ms Facility

We have reviewed the closure and post-closure cost estimates for the fiscal year ending June 30, 1990, and found the cost estimates adjusted by an inflation factor of 1.0378. On April 3, 1990, a memorandum was sent to all facilities notifying of the 1989 inflation factor, 1.041. Please recalculate the 1990 cost estimates and the financial test using the inflation factor of 1.041.

On September 24, 1990, a revised Part A application was submitted to reflect the transfer of ownership from Beazer Materials and Services to Beazer East, Inc. Form 3 Section III. B.-Process Design Capacity was incorrectly filled out. This section should list both the closed interim status landfill, D80, and the closed surface impoundment, S04. Also, the process design capacity should be the amount of waste that was left in place during closure. Enclosed is another application.

Please submit the corrected financial requirements and Part A application, and the letter of notification to the facility mailing list by November 2, 1990. The modification request will go before the Mississippi

Mr. Matthew C. Plautz

Page 2

October 15, 1990

Environmental Quality Permit Board on November 13, 1990. If you have any questions, please call me at (601) 961-5171.

Sincerely,

Gail Macalusa
Hazardous Waste Division

GM-9:dh
Enclosure



Koppers
Comp. #4

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

July 12, 1990

CERTIFIED MAIL NO. P 443 383 161

Ms. Jill M. Blundon, Vice President
Secretary & General Counsel
Beazer East, Inc.
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219

Dear Ms. Blundon:

Re: RCRA Financial Assurance
Koppers Industries, Inc.
Grenada, MS Facility
MSD007027543

Upon review of the two Closure Certifications submitted, one on January 9, 1990, for the Surface Impoundment, and the other on June 27, 1990, for the Boiler Ash Landfarm; and, the on-site inspection conducted by the Mississippi Bureau of Pollution Control on July 3, 1990, closure of both the Surface Impoundment and the Boiler Ash Landfarm appears to have been completed as per the approved closure plans for these two units. Both Beazer East, Inc. and Koppers Industries, Inc. are released from the financial assurance requirements for closure of the above hazardous waste management units in accordance with MHWMR Part 264.143.

If you have any questions, feel free to call Gail Macalusa of my staff at (601) 961-5171.

Sincerely,

A handwritten signature in cursive script that reads "James I. Palmer, Jr.".

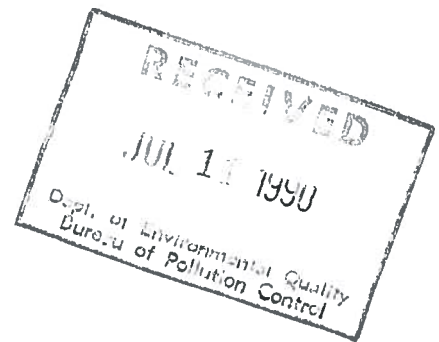
James I. Palmer, Jr.
Executive Director

JIP:GM-55:lr

pc: Mr. James R. Batchelder, KII
Mr. Matthew C. Plautz, Beazer East
Mr. James H. Scarbrough, EPA

July 6, 1990

Division of Solid and Waste Management
Bureau of Pollution Control
Department of Natural Resources
P. O. Box 10385
Jackson, Mississippi 39209



Enclosed is a revised Notification of Regulated Waste Activity for Koppers Industries, Inc. Grenada plant located in Tie Plant, MS. The form previously submitted was on an 11/85 version and was returned to us by your office. Please call me at (412)227-2677 or Mr. J. D. Clayton at the plant if you have questions.

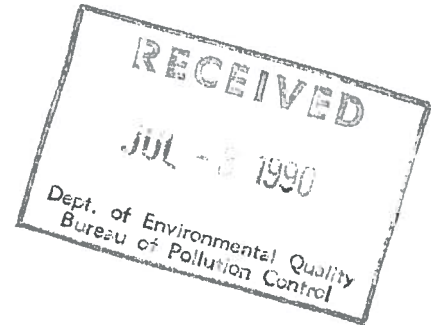
Sincerely,

Stephen T. Smith,
Environmental Program Manager

cc: J. D. Clayton, Grenada
J. R. Batchelder, K-1700
Bill Donley, K-1750
Matt Plautz, K-1450

Beazer East, Inc.
Environmental Services
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer



June 29, 1990

Mr. James Dale Beck
President, Board of Supervisors
Grenada County
P.O. Box 1208
Grenada, MS 38901

Re: Deed Restriction Survey
Koppers Industries, Inc.
Grenada, MS Facility
MSD 007 027 543

Dear Mr. Beck:

Beazer East, Inc. as operator of the closed Boiler Ash Landfarm hazardous waste management unit at the above-referenced facility and in accordance with Mississippi law has prepared the enclosed Deed Restriction Survey. The survey contains a notification that the use of the described area is restricted.

Please call if you should have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Matthew C. Plautz".

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

/lpd

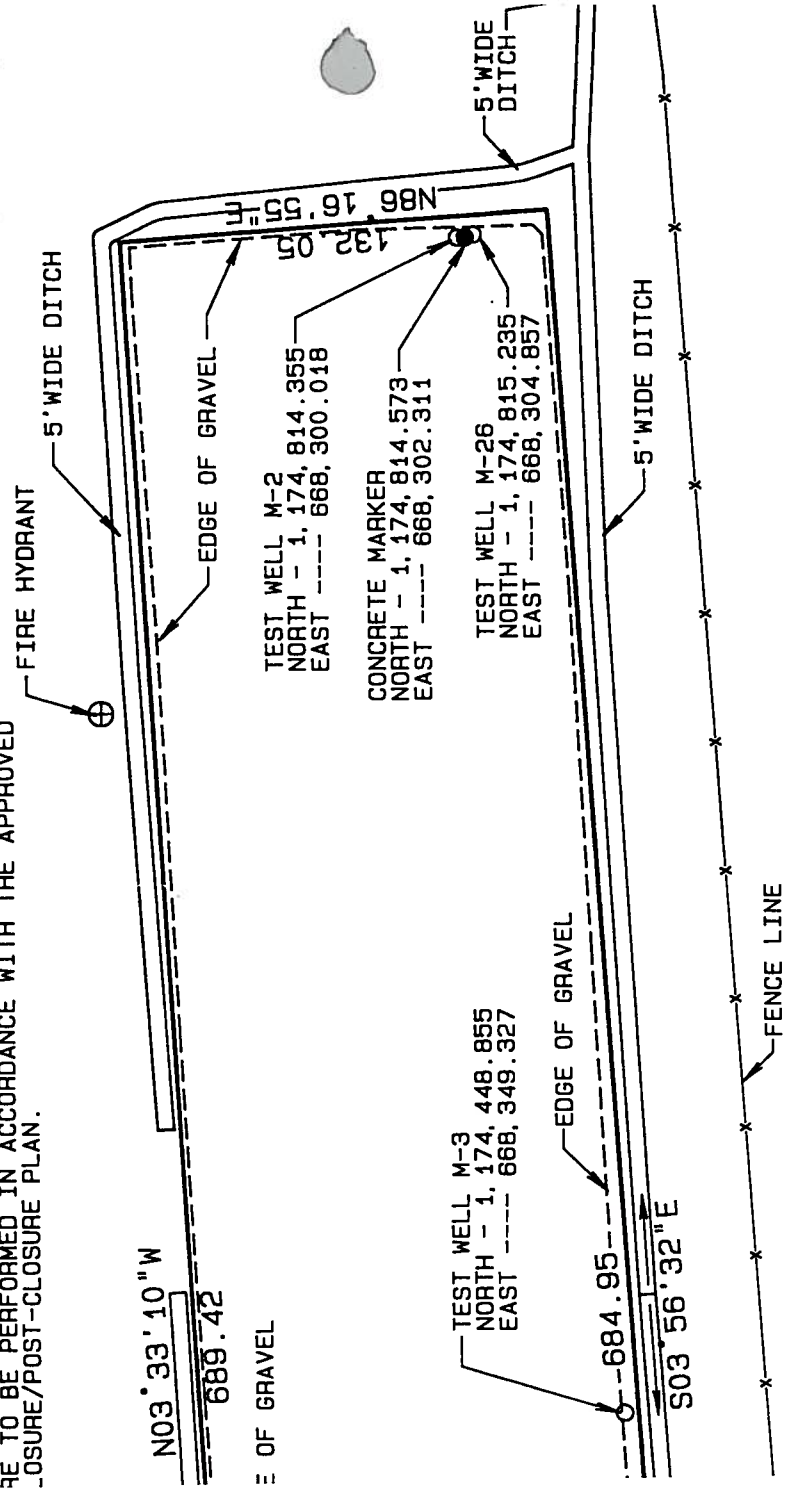
cc: B. Nolan (w/o enclosure)
R. Yocius - KER (w/o enclosure)
J. Clayton - KII
J. Batchelder - KII
G. Macalusa - MSDNR

NOTE:

THE AREA DESCRIBED HEREON PREVIOUSLY CONTAINED A WASTE MANAGEMENT UNIT DESIGNATED U.S. EPA IDENTIFICATION NUMBER SD 007027543. THE USE OF THE DESCRIBED AREA IS RESTRICTED TO ANY FUTURE USES MUST NOT DISTURB THE INTEGRITY OF THE FINAL COVER SYSTEM WITHOUT THE PRIOR APPROVAL OF THE STATE OF MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES, BUREAU OF POLLUTION CONTROL. MAINTENANCE, INSPECTIONS AND MONITORING ARE TO BE PERFORMED IN ACCORDANCE WITH THE APPROVED CLOSURE/POST-CLOSURE PLAN.



SCALE: 1"=60'



CRIPITION -

ast, Grenada County, Mississippi and being more particularly described

st of a concrete marker beside test well number M-4; thence run South
" West for 689.42 feet to a point; thence run North 86°16'55" East for
feet to the said point of beginning of herein described tract of land

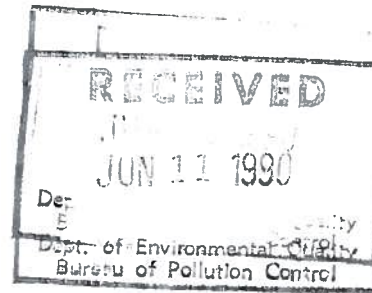
I accurate plat and description of the lands herein

2, 19 90

Surveyor's Seal: J. T. Willis, Engineer and P.E. 4049, State of Mississippi. Signature: Jack T. Willis.

Beazer East, Inc.
Environmental Services
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer



June 5, 1990

Mr. Wm. Stephen Spengler, P.E.
Mississippi Department of Natural
Resources
Bureau of Pollution Control
Box 10385
2380 Highway 80 West
Jackson, MS 39204

Re: RCRA Financial Assurance
Koppers Industries, Inc.
Grenada, MS Facility
MSD 007 027 543

Dear Mr. Spengler:

Beazer East, Inc., formerly Beazer Materials and Services, Inc., submitted to MSDNR on January 9, 1990, a Closure Construction Report for the surface impoundment at the above-referenced facility. This report contained the required certifications from the owner/operator and from a registered professional engineer.

Beazer East will be adjusting the level of financial assurance for the next reporting period to reflect the completion of closure of the surface impoundment unit which will include a reporting of \$0 for the closure cost estimate. Beazer East will continue to perform the appropriate post-closure activities for the surface impoundment in accordance with Permit No. 88-543-01.

Should you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew C. Plautz".

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

/lpd

cc: B. Nolan
D. Kerschner
B. Hamilton
J.D. Clayton - KII
J. Batchelder - KII
G. Macalusa - MSDNR

Koppers compliance

Beazer East, Inc.
Environmental Services
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer

June 27, 1990

FEDERAL EXPRESS

Ms. Gail Macalusa
MS Department of Natural Resources
2380 Highway 80 West
Jackson, MS 39204

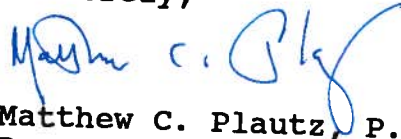
Re: Closure Construction Report
Boiler Ash Landfarm
Koppers Industries, Inc.
Grenada, MS Facility
MSD 007 027 543

Dear Ms. Macalusa:

Beazer East, Inc. has formally completed final closure of the Boiler Ash Landfarm at the above-referenced facility in accordance with the approved closure plan. Enclosed please find one copy of the "Closure Construction Documentation Report" which includes a detailed description of closure activities and contains both the Engineer's and Owner/Operator certifications of closure.

Please call if you should have any questions regarding this submittal.

Sincerely,



Matthew C. Plautz, P.E.
Program Manager-Environmental Services

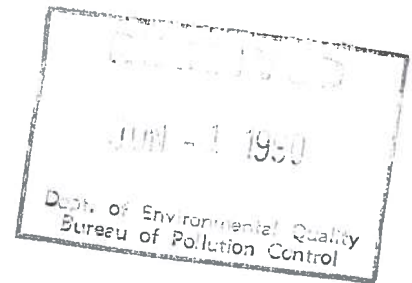
/lpd
Enclosure

cc: B. Nolan (w/o enclosure)
J.D. Clayton - KII
J. Batchelder - KII
R. Yocius - KER (w/o enclosure)

Kopper Comprehensive 1

Beazer East, Inc.
Environmental Services
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer



May 31, 1990

FEDERAL EXPRESS

Ms. Gail Macalusa
Mississippi Dept. of Natural Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

DIVISION OF SOLID WASTE

REVIEWED BY DM

DATE 6/1/90

COMMENTS sent letter to
EPA, not report => only
received me 6/1/90

Re: Draft Closure Construction
Certification Report
Boiler Ash Landfarm/
Grenada, MS
MSD 007 027 543

Dear Ms. Macalusa:

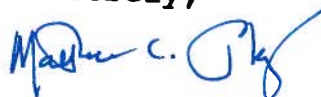
Enclosed please find a draft of the Construction Certification Report for closure of the Grenada Boiler Ash Landfarm. The majority of construction related activities have been completed at this time, however, the following items have not been included in the draft document:

- Final inspection of diversion channels and drainage structures and confirmation of cover vegetative growth,
- As-built drawings including Survey Plat and Deed Restriction Notification,
- Completion of construction inspection and daily reports,
- Completion of "Operator Certification of Closure",
- Completion of "Professional Engineers Certification of Closure",
- Completion of photographic documentation of construction activities.

Ms. Gail Macalusa
May 31, 1990
Page 2

The final version of this report will be forwarded to your office as soon as the above items have been completed but not later than June 30, 1990. If you have any questions or comments regarding this draft report, please contact me.

Sincerely,



Matthew C. Plautz, P.E.
Program Manager-Environmental Services

/lpd
Enclosure

cc: B. Nolan (w/o encl.)
R. Yocius - KER (w/o encl.)
J.D. Clayton - KII (w/o encl. - will send final version)
J. Batchelder - KII (w/o encl. - will send final version)
S. Spengler - MSDNR (w/o encl.)



Phone: 412/825-9600

3000 Tech Center Dr., Monroeville, PA 15146

Fax: 412/825-9699

Ref. No. 176999-77

May 30, 1990

Ms. Gail Macalusa
Mississippi Department of Natural Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, Mississippi 39204



Dear Ms. Macalusa:

Re: Groundwater Quality Assessment (Boiler Ash Landfarm Area)
Koppers Industries, Inc.
Grenada, MS Facility
MSD 007 027 543

In reference to Mr. Matthew Plautz's, Beazer East, Inc., letter to you on May 3, 1990, Keystone Environmental Resources, Inc. has tentatively scheduled two sampling events, one in late June and the other in late July 1990, for the seven on-site wells (M-5A, M-5B, M-2B, M-1, M-2, M-3, and M-4) monitoring the boiler ash landfarm area for the parameters 1,2-dichloroethene and trichloroethene (EPA Method 8240). These two parameters were inadvertently omitted from a second quarter 1989 list of detected Appendix IX parameters for wells M-3 and M-4. Once off-site access is obtained, these parameters will also be added to the groundwater quality assessment (GWQA) sampling program for the off-site wells. Future GWQA reports will include any necessary clarification of this situation.

If you have any questions, please contact me at 412/825-9609.

Very truly yours,

David L. King
Project Manager
Regulatory Affairs Department

DLK:ss DK73

cc: M. Plautz (Beazer)



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

May 30, 1990

Mr. J. D. Clayton
Koppers Industries, Inc.
P.O. Box 160
Tie Plant, Mississippi 38960

Dear Mr. Clayton:

Re: Operating Permit No. 0960-00012
Grenada, Mississippi

We understand from your letter dated April 17, 1990, that your company wishes to burn a new material as a fuel additive in the boiler at the Grenada plant. Please be advised that this material, coal tar distillate bottoms, is not authorized by the facility's air pollution permit and therefore is restricted until such time as necessary permits are obtained.

To pursue required air pollution permits, you should apply using the enclosed permit application and identify the operations and all pollutants. As a minimum, each pollutant and pollutant emission rate from each burning condition (new and existing) must be provided. Pollutant emission rates will need to be given in units of lbs/hr and tons/year based on capacity operations and at proposed operations, if different. Supportive assumptions, bases, and calculations should be provided. Also, the exhaust or stack parameters for each pollutant (height, velocity, diameter, and temperature) must be identified.

Also, for your information, enclosed please find a copy of procedures that will be used as a part of our evaluation of toxic pollutants.

If you have questions, please advise.

Sincerely,

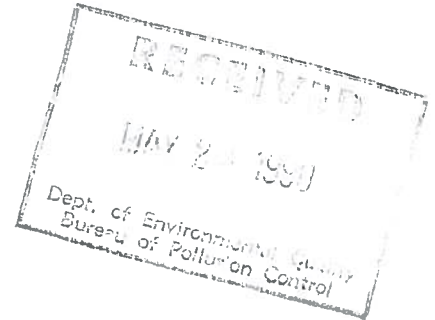
A handwritten signature in cursive script, appearing to read "Danny S. Jackson".

Danny S. Jackson, Coordinator
North Air Emissions Section

DSJ:sr

Beazer East, Inc.
Environmental Services
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer



May 17, 1990

Ms. Gail Macalusa
Mississippi Department of Natural
Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Re: GWQA-Ash Landfarm
Koppers Industries, Inc.
Grenada, Mississippi

Dear Ms. Macalusa:

Beazer East, Inc. has made repeated attempts to secure legal access to off-site locations for drilling monitoring wells for the boiler ash landfarm GWQA Program at the above-referenced facility. These attempts appeared to be favorable during early 1990 (see letter to Mr. Steve Spengler dated January 31 and February 16, 1990) but as of yet we have not reached any formal agreement to install these wells; therefore, we are at an impasse.

Beazer East, Inc. requests assistance from MSDNR to accelerate this process. Without proper access to these locations we can not complete the MSDNR approved GWQA Work Plan.

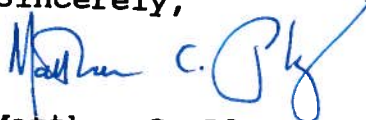
The property owner's name, address and phone number are listed below:

Mr. Wayne E. Carlin
Route 2
Stryker, OH 43557
Phone: 419-682-6441

Ms. Gail Macalusa
May 17, 1990
Page 2

Please contact me to discuss your preferred approach to address this situation.

Sincerely,



Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr

cc: B. Nolan
R. Hamilton
J. Clayton (KII)
J. Batchelder (KII)
S. Spengler (MSDNR)
D. King (Keystone)

Beazer East, Inc.
Environmental Services
436 Seventh Avenue
Pittsburgh, PA 15219
Phone: 412-227-2500
Fax: 412-227-2950

Beazer

May 3, 1990

FEDERAL EXPRESS

Ms. Gail Macalusa
Mississippi Department of Natural
Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Re: Groundwater Monitoring
Koppers Industries, Inc.
Grenada, MS Facility
MSD 007 027 543

Dear Ms. Macalusa:

We have been made aware by Keystone Environmental Resources, Inc. (Keystone) of a laboratory data transcription error. This error relates specifically to results of Appendix IX parameters for groundwater samples taken at the boiler ash landfarm during the June 20-22, 1989 second quarter sampling event. A letter describing this omission is attached.

When compared to previously reported results, there are certain discrepancies, most noticeably the detection of 1,2-dichloroethene (M-3: 63 ug/l; M-4: 150 ug/l) and trichloroethene (M-3: 2,200 ug/l; M-4: 3,300 ug/l). These constituents are not believed to be site-related, however, previous sampling events have detected their presence. These recently corrected results are important to the conduct of the ongoing groundwater quality assessment program (GWQA). In addition, the 1989 RCRA Annual Report and the RFI/CMS Phase II Work Plan contain incorrect tabulations of the Appendix IX results.

To rectify this omission Beazer East, Inc. (Beazer), formerly Beazer Materials and Services, Inc., proposes the following actions:

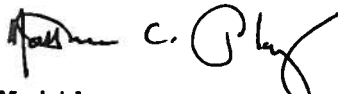
1. Keystone will resample (two rounds) the seven on-site wells (M-5A, M-5B, M-2B, M-1, M-2, M-3, and M-4) for the parameters 1, 2-dichloroethene and trichloroethene. These parameters will also be added to the sampling program for the off-site wells once access is obtained. GWQA reports will include any necessary clarification of this situation. A formal letter will be submitted to MSDNR by Keystone prior to initiation of this activity.

Ms. Gail Macalusa
May 3, 1990
Page 2

2. Keystone will amend the affected Section 3.0 of the 1989 RCRA annual report by including a discussion of these additional parameters. Please note that the Appendices to this report were correct in the original submission.
3. Keystone will modify the Phase II RFI Work Plan as appropriate. At this time, it does not appear that this work plan will require major modifications because the boiler ash landfarm is not included by a SWMU and this area is geographically removed from the central plant area.

Beazer stands prepared to rectify this situation in a timely manner. Please call if you have any questions or comments.

Sincerely,



Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr

Enclosure

cc: B. Nolan
R. Hamilton
J. Batchelder (KII)
J. Clayton (KII)
D. King (Keystone)
M. Urbassik (Keystone)
S. Spengler (MSDNR)



Phone: 412/825-9600

3000 Tech Center Dr., Monroeville, PA 15146

Fax: 412/825-9699

April 25, 1990

Mr. Matthew C. Plautz
Program Manager
Beazer East, Inc.
436 Seventh Avenue, Suite 1450
Pittsburgh, Pennsylvania 15219

Dear Matt:

Re: Grenada 2nd Quarter
1989 Analytical Results

The following summary explains how the enclosed detected Appendix IX parameters for the KII Grenada, MS facility were inadvertently omitted from a sorted data package.

After the completion of all analyses from the second quarter 1989 sampling for the Grenada plant, the assistant project manager made a special request to the department manager of the Monroeville Laboratory's Data Management Group. She requested a special format and diskette deliverable be generated to help her sort through the large quantity of analytical data she had in several hard copy data packages.

Since the analyses were performed at both the Keystone - Monroeville Laboratory and the Keystone - Houston Laboratory, there were separate data packages for the total analyses. The hard copy reports are generated from each laboratory's LIMS system or instrument data system. Only the analyses performed at each individual laboratory is entered into their respective LIMS system. In order for the Keystone - Monroeville Laboratory to generate a diskette deliverable for all analyses, all of the data would have to be entered into the LIMS system.

In order to accommodate the request of the assistant project manager, the Monroeville Data Management Group took the hard copy data generated from the Houston Laboratory and proceeded to enter these results into their LIMS system, manually.

The large number of samples analyzed and the large number of compounds associated with each analysis unfortunately increased the chance of the transcription error which eventually occurred. The manual entry of the Houston Laboratory's results into the Monroeville Laboratory's LIMS system is not standard operating procedure for the Monroeville Laboratory, and is in fact rarely done. The data generated by the Houston Laboratory is usually presented intact to the client without any manipulation by the Monroeville Laboratory. Any data generated by the Monroeville Laboratory which corresponds with data from the Houston Laboratory is added as a separate data package to the already existing data package. Thus we are confident that such an error will not occur again.

Mr. Matthew C. Plautz
Beazer East, Inc.

April 25, 1990
Page 2

We sincerely apologize for this situation and any inconvenience or problems that it may have cost you personally, or Beazer East, Inc., as a company.

If you have any questions, please contact us.

Sincerely,

David L. King

David L. King
Project Manager

Mark R. Urbassik

Mark R. Urbassik
Senior Vice President

DLK/MRU/ss DK51

**ADDITIONAL DETECTED APPENDIX IX PARAMETERS
HOUSTON LABORATORY DATA**

JUNE 20-22, 1989

**KOPPERS INDUSTRIES, INC.
GRENADA, MISSISSIPPI**

WELL	METHOD	PARAMETER	CONCENTRATION (ug/L)	DETECTION LIMIT (ug/L)
M-3	8240 (volatile)	1,2-dichloroethene (total)	63	5
M-3	8240 (volatile)	trichloroethene	2200	5
M-4	8240 (volatile)	1,2-dichloroethene (total)	150	5
M-4	8240 (volatile)	trichloroethene	3300	5
TB (July 20)	8240 (volatile)	acetone	24	10
TB (July 20)	8240 (volatile)	2-butanone	66	10
SBLK (July 7)	8270 (semi-volatile)	bis(2-ethylhexyl)phthalate	20	10
SBLK (July 18)	8270 (semi-volatile)	bis(2-ethylhexyl)phthalate	7J	10
R-1	8270 (semi-volatile)	phenol	3J	10
R-1	8270 (semi-volatile)	acenaphthene	3J	10
R-1	8270 (semi-volatile)	diethyl phthalate	2J	10
FB (June 21)	8240 (volatile)	acetone	18	10
FB (June 21)	8270 (semi-volatile)	phenol	4J	10
TB (June 21)	8240 (volatile)	acetone	24	10
TB (June 21)	8270 (volatile)	2-butanone	47	10

ADDITIONAL DETECTED APPENDIX IX PARAMETERS (continued)
HOUSTON LABORATORY DATA

JUNE 20-22, 1989

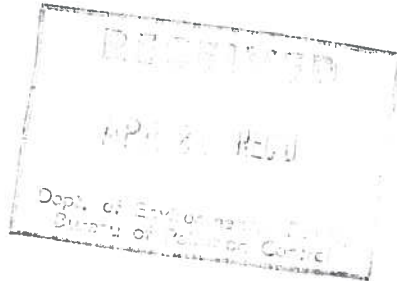
KOPPERS INDUSTRIES, INC.
GRENADA, MISSISSIPPI

WELL	METHOD	PARAMETER	CONCENTRATION (ug/L)	DETECTION LIMIT (ug/L)
R-8A	8240 (volatile)	acetone	6J	10
R-8A	8270 (semi-volatile)	bis(2-ethylhexyl)phthalate	66	20
R-8B	8240 (volatile)	acetone	17	10
R-8B	8240 (semi-volatile)	phenol	3J	10
R-8B	8270 (semi-volatile)	bis(2-ethylhexyl)phthalate	24	10
R-9D	8240 (volatile)	methylene chloride	12	5
FB (June 22)	8240 (volatile)	methylene chloride	11	5
SBLK (July 18)	8270 (semi-volatile)	bis(2-ethylhexyl)phthalate	8J	10

NOTES:

- 1) The above table of detected parameters was generated from examination of the Appendix IX data packet generated by Keystone's Houston, Texas laboratory. All volatile and semi-volatile organic compounds and organophosphates data were examined.
- 2) Where dates are indicated for TB (trip blank) and FB (field blank), the dates refer to the date sampled. For the SBLK (semi-volatiles) blank which was part of laboratory QA/QC procedures, the date refers to the date analyzed.

April 17, 1990



Mr. Sam Mabry
Mississippi Dept. of Natural Resources
Bureau of Pollution Control
P. O. Box 10385
Jackson, Ms. 39289-0385

Dear Mr. Mabry:

This refers to our telephone conversation on April 4, 1990 regarding fuel additive burning at our industrial boiler at Grenada.

The material in question is coal tar distillate bottoms with properties essentially of creosote. This material was drummed as such with the intent to recover as product or to burn as fuel. Recovery to specification product proved infeasible so we are considering the fuel option. Because of the crystalline nature of the material, it would handle best as a fuel additive onto the woodwaste chip feed of our Grenada boiler. There are approximately 1800 drums involved.

This material closely resembles the creosote process wastes typically used in the boiler, with high BTU content. I have attached the characterization analysis demonstrating the compliance of this material with the permit requirements.

The reason we called you regarding this was because the permit references "creosote waste", and the material in question is technically not considered to be a "waste". We do feel that this material fits the intent of the permit, which allows the co-firing of high BTU materials as fuel additives.

It is our intent to use this material in exactly the same manner as the creosote process waste in full accordance with the conditions of the permit. We would appreciate receiving your concurrence to use this material as a fuel additive.

Sincerely,


J. D. Clayton

cc: Mr. James R. Batchelder
Koppers Industries, Inc.

National Laboratories, Inc.
3210 Claremont Avenue
Evansville, IN 47712
Telephone (812) 422-4119

Kopper Company, Inc.
Attn: Mr. Clark Mitchell
P. O. Box 270
Carbondale, IL 62918

LOCATION:

DATE RECEIVED: 7-19-88
DATE REPORTED: 7-28-88
P.O. NUMBER:

SAMPLE #: 31003

PARAMETERS

Copper	5.08 mg/kg
Chromium	0.88 mg/kg
Arsenic	1.7 mg/kg
Zinc	7.92 mg/kg
Boron	3.1 mg/kg
BTU	13,300 BTU/lb
Moisture %	22.5 %

Analyses Reference: Standard Methods for the Examination of
Water and Wastewater, 16th Edition, 1985

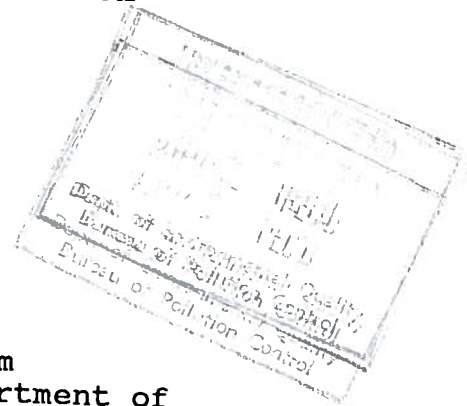
National Laboratories, Inc.

Eula Megli

Eula Megli, M.S.
Lab Supervisor

Beazer Materials and Services, Inc.
A Member of THE BEAZER GROUP
Law Department
436 Seventh Avenue, Pittsburgh, PA 15219
Phone: 412-227-2430 Fax: 412-227-2042

Beazer



Jill M. Blundon
General Counsel
Thomas Burgunder
Thomas F. Reid
George Carroll
Mary Dombrowski Wright
Billie Schrecker Nolan
William F. Giarla
Babette Magee
James B. Springfield
Real Estate Manager

April 4, 1990

Mr. Kaleel Rahaim
Mississippi Department of
Natural Resources
Bureau of Pollution Control
2330 Highway 80 W
Jackson, Mississippi 39204

Re: Koppers Industries, Inc.
Grenada, Mississippi Facility

Dear Mr. Rahaim:

Please be advised that on April 16, 1990 the name of Beazer Materials and Services, Inc. will be changed to Beazer East, Inc. This is a name change only, with no change in operations or ownership of the facility.

As you have been notified previously (see attached letter), the facility is owned by Koppers Industries, Inc. Beazer Materials and Services, Inc., soon to be known as Beazer East, Inc., is the operator of the surface impoundment pending closure, and if necessary, any post-closure activities. Beazer East, Inc. is also responsible for any financial assurance required in connection therewith.

If you have any questions, please call Babette Magee at 412/227-2705.

Very truly yours,

Jill M. Blundon
Vice President,
General Counsel and Secretary

Att.

cc: J. R. Batchelder
M. C. Plautz

Beazer Materials and Services, Inc.
A Member of THE BEAZER GROUP
Law Department
436 Seventh Avenue, Pittsburgh, PA 15219
Phone: 412-227-2430 Fax: 412-227-2042



Jill M. Blundon
General Counsel
Thomas Burgunder
Thomas F. Reid
George Carroll
Mary Dombrowski Wright
Billie Schrecker Nolan
William F. Giarla
Babette Magee
James B. Springfield
Real Estate Manager

April 7, 1989

Mr. Kaleel Rahaim
Mississippi Department of
Natural Resources
Bureau of Pollution Control
2380 Highway 80 W
Jackson, Mississippi 39204

Re: Koppers Industries, Inc.
Grenada, Mississippi Facility

Dear Mr. Rahaim:

Please be advised that on December 28, 1988, Koppers Industries, Inc. (KII) purchased the assets of the former Koppers Company, Inc. wood treating facility located at Tie Plant Road, Tie Plant, Mississippi 38960. On January 26, 1989, the name of Koppers Company, Inc. was changed to Beazer Materials and Services, Inc. (BM&S).

Under the terms of the sale, BM&S has agreed to remain the "operator" of the surface impoundment pending closure and, if necessary, any post-closure activities. BM&S also has agreed to retain responsibility for any financial assurance required in connection therewith. The term "operator" is not intended to imply that these units are or will be operating units, but is only used to distinguish that BM&S is responsible for closure of these units, which are located on the property owned by KII.

Enclosed is a revised Part A, a Notification of Hazardous Waste Activity Form, and Financial Assurance Documentation. If you have any questions concerning this matter, please call Babette Magee of BM&S at 412/227-2705.

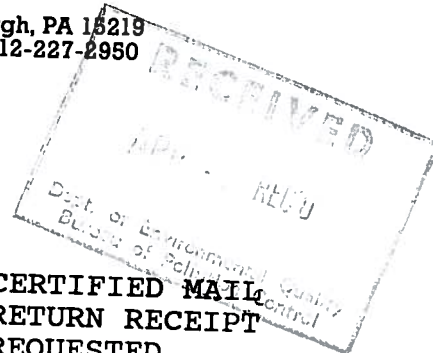
Very truly yours,

Jill M. Blundon
Vice President,
General Counsel and Secretary

cc: J. R. Batchelder
G. Edwards
B. Magee

Beazer Materials and Services, Inc.
A Member of THE BEAZER GROUP
Environmental Services
436 Seventh Avenue, Pittsburgh, PA 15219
Phone: 412-227-2500 Fax: 412-227-2950

Beazer



March 30, 1990

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

DIVISION OF SOLID WASTE

REVIEWED BY Am

DATE

COMMENTS Sent to
EPA 4/9/90

Ms. Gail Macalusa
Mississippi Department of
Natural Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Re: Koppers Industries, Inc.
Grenada, MS Facility
MSD 007027543

Dear Ms. Macalusa:

This letter is in response to your letter dated March 16, 1990 relative to findings of the MSDNR Compliance Evaluation Inspection on February 22, 1990 at the above-referenced facility. This letter cited an apparent violation of MHWMR 265.73(b)(6) for failure to maintain monitoring, testing, and analytical data at the facility.

Upon communication with Mr. J. D. Clayton, Plant Manager, it was discovered that the Second Quarter Groundwater Monitoring data were not readily available at the site, although the 1989 RCRA Annual Groundwater Monitoring Report was available. Mr. Clayton also indicated that he communicated this information to you in a recent telephone conversation. I have therefore asked Keystone Environmental Resources, Inc. (Keystone) to forward a copy of this specific data to the Grenada facility by April 1, 1990.

Please call if you have any questions or comments.

Sincerely,

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr

cc: B. Nolan
J. Batchelder (KII)
J. Clayton (KII)
J. Scarbrough (USEPA)



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

MEMORANDUM

*Sent to: Matt Planty
Becky Mattingly
Lemmas
on 4/3/90. M.M.*

TO: Hazardous Waste TSD Facilities
FROM: Hazardous Waste Division
RE: Annual Closure/Post-Closure Cost Estimate Update
DATE: March 27, 1990

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 264 and 265, Subpart H require owners and operators of hazardous waste management facilities to annually update closure and/or post-closure cost estimates for inflation.

The inflation factor for 1989 is 1.041. Therefore, if your current cost estimate is \$15,000, the adjusted cost will be $(\$15,000) \times (1.041) = \$15,615$.

If the updated closure/post-closure costs exceed the amount provided by your financial assurance mechanism, the mechanism must be updated as follows:

- A. Facilities that use the Financial Test must resubmit financial information incorporating the closure/post-closure cost estimate update within 90 days after the end of their fiscal year;
- B. Facilities that use the Trust Fund must update Schedule A of the Trust Fund within sixty (60) days after the change in the current cost estimate covered by the agreement. Annual payments into the Trust Fund must be made no later than thirty (30) days after the anniversary date of the mechanism;
- C. Facilities that use the Surety Bond must either increase the penal sum of the bond and submit evidence of such increase to our office or obtain alternate financial assurance within sixty (60) days after computing an increase in costs;

- D. Facilities that use the Letter of Credit must either cause the amount of the credit to be increased so that it at least equals the current closure/post-closure cost estimate and submit evidence of such increase to our office or obtain other financial assurance within sixty (60) days after computing the increase; and
- E. Facilities that use Closure Insurance must either cause the face amount of the insurance to be increased to the current closure cost estimate and submit evidence to our office or obtain other financial assurance within sixty (60) days after computing the increase.

If you have any questions, please call us at (601) 961-5171.

LC-4:lr



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

March 16, 1990

CERTIFIED MAIL NO. P 443 383 268

Mr. Matthew C. Plautz, P.E.
Program Manager
Environmental Services
Beazer Materials & Services, Inc.
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219

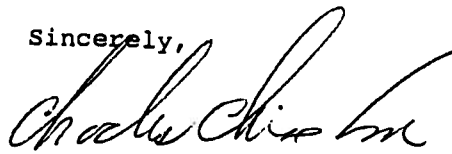
Dear Mr. Plautz:

Re: Boiler Ash Landfarm
Closure Schedule
Koppers Industries, Inc.
Grenada, MS Facility

On March 13, 1990, the Mississippi Environmental Quality Permit Board approved your request for a closure schedule extension on the Boiler Ash Landfarm from February 9, 1990, to June 1, 1990. Based on the new schedule, we should receive the closure certification package by June 1, 1990.

If you have any questions, feel free to contact Gail Macalusa of my staff at (601) 961-5171.

Sincerely,


Charles H. Chisolm
Bureau Director

CHC:GM-22:lr

Enclosure

pc: Mr. James H. Scarbrough, EPA (w/enclosure)



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS
GOVERNOR

March 16, 1990

CERTIFIED MAIL NO. P 443 383 269

Mr. Matthew C. Plautz, Program Manager
Environmental Services
Beazer Materials & Services
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219

Dear Mr. Plautz:

Re: Koppers Industries, Inc.
Grenada Facility
Compliance Evaluation Inspection
MSD007027543

Enclosed please find an inspection report and checklist that was completed as a result of a Compliance Evaluation Inspection at Koppers Industries, Inc. on February 22, 1990. This inspection revealed the following apparent violations of the Mississippi Hazardous Waste Management Regulations (MHWMR) and Mississippi Hazardous Waste Permit No. 88-543-01:

Permit Condition IV.H.1 - Reporting Recordkeeping and Response; and
MHWMR 265.73(b)(6) - Operating Record.

We request that you respond to these apparent violations within 10 days of receipt of this letter. This response should contain: (1) actions that have been taken to correct the violations, (2) schedule for correcting the violations, or (3) reasons that you believe the alleged violation(s) did not exist. The Bureau will review this information before determining if further action including a penalty is warranted. Failure to submit this information may result in enforcement action.

If you have any questions, do not hesitate to contact me at (601)
961-5171.

Sincerely,



Gail Macalusa
Hazardous Waste Division

GM-24:lr

Enclosures

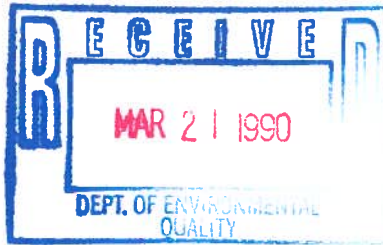
pc: Mr. James H. Scarbrough, EPA (w/enclosures)
Mr. J. R. Batchelder, KII (w/enclosures)
Mr. J. D. Clayton, KII (w/enclosures)



Phone: 412/825-9600

3000 Tech Center Dr., Monroeville, PA 15146

Fax: 412/825-9699



Ref. No. 176999-04

March 20, 1990

Ms. Gail Macalusa
Hazardous Waste Division
Mississippi Department of Natural Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Dear Ms. Macalusa:

RE: Koppers Industries, Inc.
Grenada, Mississippi

On behalf of Beazer Materials and Services, Inc. (BM&S), enclosed are two copies of a Groundwater Quality Assessment (GWQA) Interim Report for the Boiler Ash Disposal Area at the above-referenced facility. BM&S is actively seeking an access agreement with the landowner of the property adjacent to the boiler ash disposal area in order to install the off-site wells and complete the GWQA. Quarterly groundwater monitoring of this area will continue in 1990 as specified in the enclosed Interim Report.

If you have any questions, please contact Mr. Matthew Plautz of BM&S at 412/227-2952 or me at 412/825-9609.

Sincerely,

David L. King

David L. King
Project Manager
Regulatory Affairs Department

DLK:ss DK5
Enc.

cc: J. Batchelder - KII
J. Clayton - Plant Manager
M. Plautz - BM&S
D. Smith - Keystone

DIVISION OF SOLID WASTE
REVIEWED BY DM
DATE 4/2/90
COMMENTS sent to EPA

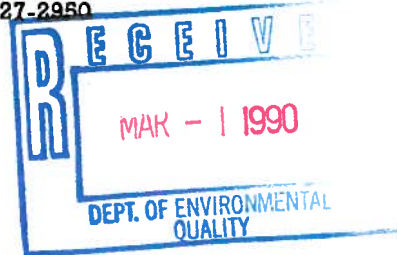
MEMORANDUM

To: Koppers File
From: Lois Macaluso
Date: May 3, 1990

In accordance with Administrative Order 1598-89, Koppers submitted the report Risk-Based Engineering Assessment Arenada County Landfill in October, 1989. The report was reviewed for waste characterization, waste quantification, exposure pathways, landfill setting, and landfill operation. The Bureau concurs with the finding in the report - the potential impact of the ash disposal is very low and no further assessment is warranted at this time.

I also had discussions with Billy Warden in the Groundwater Division of the Bureau. He said within a couple of years, installation of monitoring wells at municipal landfills should be promulgated.

Beazer



February 28, 1990

FEDERAL EXPRESS

Mr. Wm. Stephen Spengler, P.E.
Mississippi Department of Natural
Resources
Bureau of Pollution Control
Box 10385
2380 Highway 80 West
Jackson, MS 39204

Re: Boiler Ash Landfarm
Closure Schedule
Koppers Industries, Inc.
Grenada, MS Facility

Dear Mr. Spengler:

As you have requested, this letter will serve as further substantiation of the extension request for completing the closure of the boiler ash landfarm at the above-referenced facility. This schedule extension, from February 9, 1990 to April 15, 1990, was submitted to Ms. Macalusa of your offices on November 8, 1989. The original extension request was predicated on initiation of field activities in November, 1989, which actually was not initiated until January 24, 1990.

The following documents the extension request presented herein:

1. Beazer Materials and Services, Inc. (BM&S) received approval from MSDNR to proceed with closure of the unit in June, 1989. The closure plan was submitted in November, 1987, and contemplated by schedule the approval of this work effort in April, 1988 by MSDNR. BM&S was not prepared to immediately begin work on the project once notification was made by MSDNR. Items such as securing monies to proceed and selecting a consultant to manage the project caused a delay of approximately 10 weeks.

DIVISION OF SOLID WASTE

REVIEWED BY Am

DATE

COMMENTS sent to

EPA 3/6/90

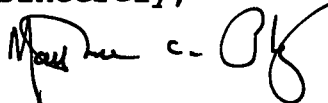
February 28, 1990
Mr. Wm. Stephen Spengler, P.E.
Page 2

2. Keystone Environmental Resources, Inc. (Keystone), our consultant on the project, indicated that after a site tour conducted to evaluate current conditions, the ash landfarm area was much larger than anticipated as presented in the conceptual closure plan submitted in November, 1987. This necessitated the reworking of design drawings necessary to bid the project. This unanticipated work effort shifted the actual start date for the project from late November, 1989 to mid-January 1990. A revised bar chart indicating the new projected closure schedule is attached for your information. The chart indicates that delays have occurred during actual construction due to rain days (12 to date) and in problems compacting the ash during rain events which required a stabilization step (using imported lime) which consumed 12 working days not contemplated in the original schedule.

Based on the new schedule we anticipate completion of closure prior to June 1, 1990, including the closure certification package and we hereby formally request an extension. BM&S believes that the additional time is warranted to perform the closure project under strict adherence to the approved closure plan.

I trust that this information satisfies your needs at this time. Please do not hesitate to call if you should have any questions.

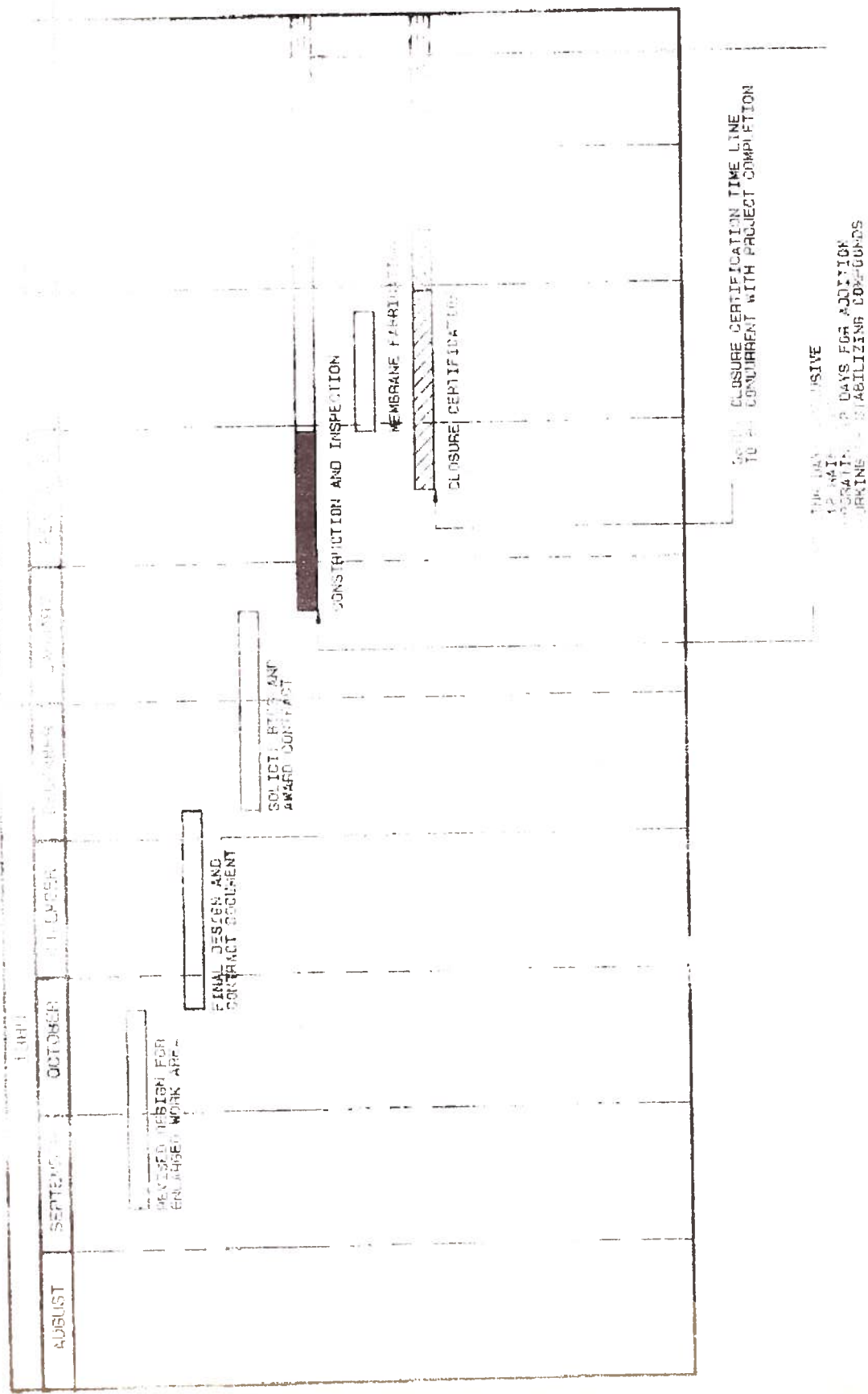
Sincerely,

A handwritten signature in black ink, appearing to read "Matthew C. Plautz", with a stylized flourish at the end.

Matthew C. Plautz, P.E.
Program Manager

MCP/mtd

cc: J. R. Batchelder (KII)
J. Clayton (KII)
R. G. Hamilton
B. S. Nolan
R. Yocius (Keystone)



ADDITIONAL TIME REQUESTED
PREVIOUS RAIN DOWN TIME AND
OF STABILIZATION COMPOUND
ANTICIPATED WEATHER DELAYS



Phone: 412/825-9600

3000 Tech Center Dr., Monroeville, PA 15146

Fax: 412/825-9699

Ref. No. 176999-02

February 28, 1990

Ms. Gail Macalusa
Hazardous Waste Division
Mississippi Department of Natural Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Dear Ms. Macalusa:

Re: Koppers Industries, Inc.
Grenada, Mississippi
EPA ID #MSD007027543

On behalf of Beazer Materials and Services, Inc. (BM&S), enclosed are two copies of the 1989 RCRA Annual Report for the above-referenced facility. If you have questions or require additional information, please contact Mr. Matthew Plautz of BM&S at 412/227-2952.

Sincerely,

David L. King

David L. King
Project Manager

DLK:ss

Enc. (2)

cc: J. Batchelder - KII
J. Clayton - Plant Manager
M. Plautz, BM&S
Director - U.S. EPA, Region IV

DIVISION OF SOLID WASTE

REVIEWED BY DM

DATE _____

COMMENTS sent to

EPA 3/5/90

Beazer

February 20, 1990



Mr. James Dale Beck
President, Board of Supervisors
Grenada County
P.O. Box 1208
Grenada, MS 38901

Re: Koppers Industries, Inc.
Grenada, Ms Facility
MSD 007 027 543

Dear Mr. Beck:

Beazer Materials and Services, Inc., as operator of the closed surface impoundment hazardous waste management unit at the above-referenced facility and in accordance with Mississippi law, has prepared the enclosed Certificate of Survey. The survey contains a notification that the use of the described area is restricted.

Please call if you have any questions.

Sincerely,

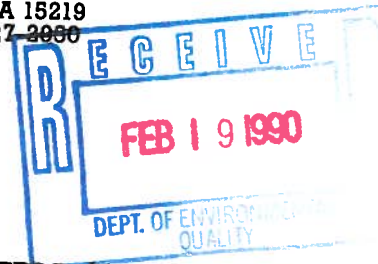
A handwritten signature in dark ink, appearing to read "Matthew C. Plautz".

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr
Enclosure

cc: R. Hamilton (w/o enclosure)
B. Nolan (w/o enclosure)
R. Yocius [Keystone] (w/o enclosure)
J. Clayton [KII] (Refer to Closure Report for survey copy)
J. Batchelder [KII] (Refer to Closure Report for survey copy)
W. Spengler [MSDNR] (Refer to Closure Report for survey copy)

Beazer



February 16, 1990

FEDERAL EXPRESS

Mr. Wm. Stephen Spengler, P.E.
Mississippi Department of Natural
Resources
Bureau of Pollution Control
Box 10385
2380 Highway 80 West
Jackson, MS 39204

Re: Koppers Industries, Inc.
Grenada, MS Facility

Dear Mr. Spengler:

This letter is in response to your letter dated January 30, 1990 in which several issues relative to the above-referenced facility were raised. The following constitutes our response to these items:

1. The delays associated with the conduct of the GWQAP for the boiler ash landfarm were detailed in a letter to Ms. Macalusa of your offices dated January 31, 1990, a copy of which is attached. The delays have revolved around our inability to secure off-site access for the drilling of proposed monitoring wells. Our efforts in obtaining the appropriate off-site access agreement continues to this date. As mentioned in this letter we have asked Keystone Environmental Resources, Inc. to prepare an interim report addressing groundwater quality in the absence of off-site data. The original schedule estimated in the approved work plan was contingent on the securement of the off-site access which is central to our investigation.
2. The text referenced in the Risk-Based Engineering Assessment-Grenada County Landfill report erroneously indicates that EP Toxicity metals analyses were conducted on ash samples in 1986 and therefore are not provided in Exhibit 4. This was discussed with Ms. Macalusa by telephone in early January 1990 at which time I provided EP Toxicity data dated January 25, 1985 from our files to her via facsimile. I have attached a copy of these data for your convenience. This is the extent of the data available in our files.

Mr. William Stephen Spengler, P.E.
February 16, 1990
Page 2

3. The materials generated during the installation and development of monitoring wells for the GWQAP for the boiler ash landfarm consists of drilling fluids and muds. These materials have been placed in 55-gallon steel drums for interim storage. An inventory of the drums is attached for your attention. These materials are not derived from a listed hazardous waste, and based on our knowledge of the type of soil where borings were located should not exhibit the characteristics of a hazardous waste. Based on this assessment we propose to manage the solid fractions in conjunction with the management of the on-site waste pile material and the aqueous fractions will be processed in the on-site wastewater treatment plant.

I trust that these responses address the issues raised in your letter. Please do not hesitate to call me should you have any questions.

Sincerely,



Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr

Enclosure

cc: B. Nolan
J. Clayton (KII)
J. Batchelder (KII)
D. King (Keystone)
G. Macalusa (MSDNR)
J. Scarbrough (USEPA IV)

DRUM INVENTORY
ASH PILE - GWQA

BEAZER MATERIALS AND SERVICES, INC.
GRENADA, MS

<u>GENERAL CONTENT</u>	<u>NUMBER OF DRUMS</u>
Empty (clean)	121
Empty (dirty)	1 - Donated to KII
Unused Grout 10-22-89	2
Unused Grout 10-23-89	1
Well M-2B Drill Mud/Cuttings 10-17-89	6
Well M-2B Flushwater 10-17-89	7
Well M-2B Grout Cuttings 10-21-89	3
Well M-2B Drill Mud/Cuttings 10-21-89	2
Well M-2B Drill Mud/Cuttings 10-21-89 and Boring BM-2B Extra Grout 10-22-89	1
Well M-2B Flushwater/Cuttings 10-21-89	1
Well M-2B Flushwater 10-21-89	1
Well M-2B Grout Water 10-21-89	1
Boring BM-2B Casing Flushwater 10-21-89	2
Boring BM-2B Grout Water 10-21-89	1
Boring BM-2B Drill Mud 10-22-89	5
Boring BM-2B Drill Mud/Cuttings 10-22-89	2
Boring BM-2B Flushwater 10-21-89	1
Boring BM-2B Grout Water 10-22-89	1
Well M-5A Drill Mud/Cuttings 10-19-89	2
Well M-5A Flushwater 10-19-89	4
Well M-5B Drill Mud/Cuttings 10-18-89	5
Well M-5B Flushwater 10-18-89	5
Well M-5B Grout Cuttings/Water 10-23-89	2
Well M-5B Drill Mud/Cuttings 10-23-89	1
Well M-5B Drill Mud 10-23-89	2
Well M-5B Flushwater/Cuttings 10-23-89	1
Well M-5B Flushwater 10-23-89	3
Unused Grout and Well M-5B Grout Cuttings/Water 10-23-89	1

KOPPERS

Interoffice Correspondence

JAN 24 1985



To C. J. Vita
Location Pittsburgh
Subject Grenada, MS
Ash Analyses
(821-1739)

From R. D. Hepner
Location Monroeville
Date January 25, 1985

Two, five gallon composite samples of Boiler Fly Ash (GM-279) and Boiler Bottom Ash (GM-280) were received October 4, 1984 for analyses you requested in a letter of October 2, 1984 to R. C. Bartlow.

The results of requested analyses are presented below:

Characteristics

GM-279

GM-280

Physical:

pH
Visual

9
powdery brown

11
powdery white
with stones

EP Toxicity Characteristics:

Arsenic	< 2.0	< 2.0
Barium	< 1.0	3.8
Cadmium	0.001	< 0.001
Chromium	0.026	0.077
Lead	< 0.1	< 0.1
Mercury	< 0.0002	< 0.0002
Selenium	< 0.005	< 0.005
Silver	< 0.05	< 0.05

Additional Test:

Results in mg/L

Zinc, Total

160 mg/Kg

200 mg/Kg

The EP Toxicity Metals are all below recommended maxima.

R. D. Hepner
R. D. Hepner

RDH:mjt

cc: R. C. Bartlow-Grenada
C. P. Brush
J. Kane
T. A. Marr

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 1
To <u>Gayle Macalusa</u>	From <u>MCPLAUTZ</u>	
Co. <u>MSDNR</u>	Co. <u>BT745</u>	
Dept.	Phone #	
Fax # <u>601-961-5190</u>	Fax # <u>412-227-2950</u>	



January 31, 1990

Ms. Gail Macalusa
Mississippi Department of
Natural Resources
2380 Highway 80 West
Jackson, MS 39209

Re: Boiler Ash Landfarm
Koppers Industries, Inc.
Grenada, MS Facility
MSD 007 027 543

Dear Ms. Macalusa:

The purpose of this letter is to bring you up to date on the current status of activities involving the boiler ash landfarm at the above referenced facility. The ongoing activities include the conduct of the Groundwater Quality Assessment plan (GWQAP) and the physical closure of the unit.

The GWQAP has been delayed due to the inability of Beazer Materials and Services, Inc. (BMS) to obtain access to the proposed off-site well locations. This problem has been communicated to you verbally since late October 1989. The following presents a summary of our efforts to date:

- o Late September 1989- Keystone Environmental Resources, Inc. (Keystone), our consultant on the project, begins a records search to identify the property owners for the proposed well locations.
- o 9/27/89 thru 10/17/89- Keystone contacts Mr. Wayne E. Carlin, the property owner, to explain the proposed work effort and forwards a copy of the standard BMS access agreement. Mr. Carlin at the end of this discussion cycle indicates he will not grant the requested access because the well locations will potentially interfere with farming.
- o 10/17 thru 10/27/89- Keystone proceeds with the installation of three on-site monitoring wells to keep the project moving forward in the absence of secured off-site access.

Ms. Gail Macalusa
January 31, 1990
Page 2

- o 11/15/89- Keystone begins sampling of new wells in accordance with the work plan in absence of secured off-site access.
- o 11/89 thru 12/89- BM&S's legal staff continue discussions with Mr. Carlin to obtain a suitable legal agreement for off-site access.
- o Week of 12/11/89- First round of groundwater sampling completed.
- o 1/5/90- Mr. Carlin discusses well locations with Keystone and indicates he will be at the property on 1/15/90. (Note: Mr. Carlin is an absentee property owner who lives in Ohio)
- o Week of 1/8/89- Second round of groundwater sampling completed.
- o 1/15/90- Keystone meets with Mr. Carlin at his property to flag proposed well locations for the GWQAP and for additional locations contemplated for the RFI Phase II Work Plan. Mr. Carlin finally appears interested in working out some kind of access agreement with BM&S.
- o 1/15/90 thru present- BM&S legal staff continues to work with Mr. Carlin to obtain a signed access agreement. Resolution of this matter is anticipated in the near future.

I have instructed Keystone to begin the preparation of an "interim" type report based on the information obtained to date during our assessment. As of this date the analytical data have not been received from the laboratory. It is BMS's intention to submit to MSDNR the data generated in a timely matter. As indicated in the GWQAP schedule, the timing of activities associated with this work effort were contingent upon BMS obtaining the proper off-site access agreement. The delays described above have revolved around the access problems we have had and not on field delays associated with our contractors. We are prepared to complete the GWQAP upon receipt of the appropriate off-site access agreement and in no way are seeking to delay the issuance of a RCRA permit for this unit.

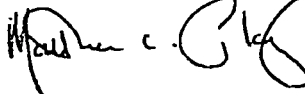
With regards to the closure schedule for the ash landfarm the following information details the most current status. BMS requested an extension for the completion date for closure of this unit in a letter to you dated November 8, 1989. The extension date requested was April 15, 1990. The actual field work for this unit

Ms. Gail Macalusa
January 31, 1990
Page 3

was initiated the week of 1/22/90 and is expected to take approximately 3 months to complete assuming good weather and other factors. The engineering certification package is expected to take another month for a total project duration of four months. Based on this knowledge the existing estimated completion date of April 15, 1990 is non-attainable and a new completion date of June 1, 1990 is hereby requested. The primary reason why the project was not initiated until late January 1990 was the fact that the actual areal dimensions of the unit were quite larger than those indicated in the conceptual closure plan, necessitating a longer time frame to compile the final plans and specifications for the unit which were suitable for bidding.

We trust that this information satisfies your concern with the identified schedules. Please call if you have any questions.

Very truly yours,



Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr

cc: B. Nolan
J. Clayton (KII)
J. Batchelder (KII)
S. Spengler (MSDNR)
R. Yocius (Keystone)
D. King (Keystone)



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39289-0385
(601) 961-5171



January 30, 1990

CERTIFIED MAIL NO. P 443 383 033

FILE COPY

Mr. Matthew C. Plautz, P.E.
Program Manager - Environmental Services
Beazer Materials & Services, Inc.
436 Seventh Avenue
Pittsburgh, Pennsylvania 15219

Dear Mr. Plautz:

Re: Tie Plant, Mississippi Facility
MSD007027543

A review of our files indicates that Beazer Materials and Services is delinquent and/or deficient in submitting the following information to our office:

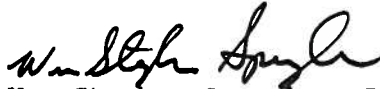
1. On July 21, 1989, the Bureau transmitted our concurrence of the Groundwater Quality Assessment Workplan for the Boiler Ash Landfill. The workplan identified a 26 week schedule for accomplishing their work. January 23, 1990, is the approximate date the assessment report should have been sent to our office. As of this date we have not received this report.
2. Administrative Order No. 1598-89, Part 5.A., required the analysis of the fly ash and cinders for EP Toxicity Metals in addition to other constituents. Page 5 of the report submitted references results of a 1986 EP Toxic metals analysis; however, Exhibit 4 does not contain the analytical data referenced.
3. In a telephone conversation with Dianne Smith (Keystone) on October 13, 1989, the Bureau requested analytical results of drilling muds produced from the installation of monitoring wells at the boiler ash land farm, if the muds were not going to be disposed as a hazardous waste. The Bureau has not received documentation regarding the drilling muds.

Also, please be aware that documentation of closure of the boiler ash landfarm is due on February 9, 1990.

We request that the requested information be submitted to our office by February 16, 1990. Failure to receive this information may result in the Bureau pursuing formal enforcement action against Beazer Materials and Services, Inc.

If you have any questions, please feel free to contact Ms. Gail Macalusa or myself at (601) 961-5171.

Sincerely,



Wm. Stephen Spengler, P.E., Coord.
RCRA TSD Branch

WSS-38:lr

pc: Mr. James H. Scarbrough, EPA

Beazer



January 31, 1990

Ms. Gail Macalusa
Mississippi Department of
Natural Resources
2380 Highway 80 West
Jackson, MS 39209

Re: Boiler Ash Landfarm
Koppers Industries, Inc.
Grenada, MS Facility
MSD 007 027 543

Dear Ms. Macalusa:

The purpose of this letter is to bring you up to date on the current status of activities involving the boiler ash landfarm at the above referenced facility. The ongoing activities include the conduct of the Groundwater Quality Assessment plan (GWQAP) and the physical closure of the unit.

The GWQAP has been delayed due to the inability of Beazer Materials and Services, Inc. (BMS) to obtain access to the proposed off-site well locations. This problem has been communicated to you verbally since late October 1989. The following presents a summary of our efforts to date:

- o Late September 1989- Keystone Environmental Resources, Inc. (Keystone), our consultant on the project, begins a records search to identify the property owners for the proposed well locations.
- o 9/27/89 thru 10/17/89- Keystone contacts Mr. Wayne E. Carlin, the property owner, to explain the proposed work effort and forwards a copy of the standard BMS access agreement. Mr. Carlin at the end of this discussion cycle indicates he will not grant the requested access because the well locations will potentially interfere with farming.
- o 10/17 thru 10/27/89- Keystone proceeds with the installation of three on-site monitoring wells to keep the project moving forward in the absence of secured off-site access.

Ms. Gail Macalusa
January 31, 1990
Page 2

- o 11/15/89- Keystone begins sampling of new wells in accordance with the work plan in absence of secured off-site access.
- o 11/89 thru 12/89- BM&S's legal staff continue discussions with Mr. Carlin to obtain a suitable legal agreement for off-site access.
- o Week of 12/11/89- First round of groundwater sampling completed.
- o 1/5/90- Mr. Carlin discusses well locations with Keystone and indicates he will be at the property on 1/15/90. (Note: Mr. Carlin is an absentee property owner who lives in Ohio)
- o Week of 1/8/89- Second round of groundwater sampling completed.
- o 1/15/90- Keystone meets with Mr. Carlin at his property to flag proposed well locations for the GWQAP and for additional locations contemplated for the RFI Phase II Work Plan. Mr. Carlin finally appears interested in working out some kind of access agreement with BM&S.
- o 1/15/90 thru present- BM&S legal staff continues to work with Mr. Carlin to obtain a signed access agreement. Resolution of this matter is anticipated in the near future.

I have instructed Keystone to begin the preparation of an "interim" type report based on the information obtained to date during our assessment. As of this date the analytical data have not been received from the laboratory. It is BMS's intention to submit to MSDNR the data generated in a timely matter. As indicated in the GWQAP schedule, the timing of activities associated with this work effort were contingent upon BMS obtaining the proper off-site access agreement. The delays described above have revolved around the access problems we have had and not on field delays associated with our contractors. We are prepared to complete the GWQAP upon receipt of the appropriate off-site access agreement and in no way are seeking to delay the issuance of a RCRA permit for this unit.

With regards to the closure schedule for the ash landfarm the following information details the most current status. BMS requested an extension for the completion date for closure of this unit in a letter to you dated November 8, 1989. The extension date requested was April 15, 1990. The actual field work for this unit

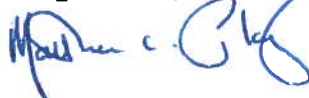
rec. 3/21/9

Ms. Gail Macalusa
January 31, 1990
Page 3

was initiated the week of 1/22/90 and is expected to take approximately 3 months to complete assuming good weather and other factors. The engineering certification package is expected to take another month for a total project duration of four months. Based on this knowledge the existing estimated completion date of April 15, 1990 is non-attainable and a new completion date of June 1, 1990 is hereby requested. The primary reason why the project was not initiated until late January 1990 was the fact that the actual areal dimensions of the unit were quite larger than those indicated in the conceptual closure plan, necessitating a longer time frame to compile the final plans and specifications for the unit which were suitable for bidding.

We trust that this information satisfies your concern with the identified schedules. Please call if you have any questions.

Very truly yours,



Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr

cc: B. Nolan
J. Clayton (KII)
J. Batchelder (KII)
S. Spengler (MSDNR)
R. Yocius (Keystone)
D. King (Keystone)

RECORD OF TELEPHONE CONVERSATION

Name of firm or party

Bryan Patrick + Service

Address

Pittsburgh

Contact

Matt Planty

Phone

(412) 227-2952

In correspondence dated October 6, 1989, Bm+S notified the Bureau of damage to monitoring wells R-8, R-8B, and R-D during closure of the surface impoundment. Matt Planty informed me today that they were able to repair the wells without reconstruction.

Because the wells were not replaced, there will not be a need for permit modification.

Signature

David Macaluso

Date

11/5/90

Beazer



January 15, 1990

DIVISION OF SOLID WASTE

REVIEWED BY DM

DATE _____

COMMENTS sent to EPA

Ms. Gail Macalusa
Mississippi Department of
Natural Resources
Bureau of Pollution Control
PO Box 10385
2380 Highway 80 West
Jackson, MS 39209

Re: Surface Impoundment Closure
Final Survey Plat
Koppers Industries Inc.
Tie Plant, MS
MSD 007 027 543

Dear Ms. Macalusa:

Enclosed please find two copies of the Final Survey Plat for the surface impoundment for the above referenced facility. The plat should be inserted into Section 4.0 of the Closure Construction Report previously submitted to your offices.

Please call if you should require additional information .

Sincerely,

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr

Enclosures

cc: B. Nolan [w/o enclosure]
M. Bollinger (Keystone) [w/o enclosure]
J. Batchelder (KII)
J.D. Clayton (KII)

Beazer Materials and Services, Inc.
A Member of THE BEAZER GROUP
Environmental Services
436 Seventh Avenue, Pittsburgh, PA 15219
Phone: 412-227-2500 Fax: 412-227-2950

Beazer

January 9, 1990

FEDERAL EXPRESS

Ms. Gail Macalusa
Mississippi Department of Natural
Resources
Bureau of Pollution Control
2380 Highway 80 West
Jackson, MS 39204

Re: Koppers Industries, Inc.
Grenada, Mississippi
MSD 007 027 543

Dear Ms. Macalusa:

Beazer Materials and Services, Inc. (BM&S) has completed the closure of the surface impoundment system at the above-referenced facility in accordance with the approved closure plan, as amended. Enclosed please find two copies of the "Closure Construction Documentation Report" which includes a detailed description of closure activities and contains the Engineer's and Owner/Operator's certifications of closure. Please note that we have not as yet received the final survey of the unit and will forward this to your attention when received (expected later this week).

Please call if you should have any questions with respect to this report.

Sincerely,

Matthew C. Plautz / DRK

Matthew C. Plautz, P.E.
Program Manager-Environmental Services

MCP/cr
Enclosures

cc: R. Hamilton (w/o enclosure)
B. Nolan (w/o enclosure)
D. Kerschner (w/o enclosure)
J. Batchelder [KII]
J. Clayton [KII]
M. Bollinger [Keystone] (w/o enclosure)

DIVISION OF SOLID WASTE

REVIEWED BY DM

DATE 1/11/90

COMMENTS sent to EPA