

Invoice

Invoice Number:
Date: August 23, 1999

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 1982 - 1987 <i>correct</i>	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1982	40.00	40.00
5	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1983 - 1987	30.00	150.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1982	23.00	23.00
5	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1983 - 1987	17.00	85.00
1	UNFILTERED ARSENIC AND LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1980	80.00	80.00
1	FILTERED ARSENIC AND LEAD SAMPLE + FILTER ANALYZED, Gulfport Fertilizer Sample Numbers 1981, 1988	80.00	80.00
SUBTOTAL			483.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$483.00

FILE COPY

*E-mailed corrected invoice to
Suzanne Polander 8-23-99*

Invoice

Invoice Number:
Date: August 2, 1999

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
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DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 1935 - 1939 → 1982-1987	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1982	40.00	40.00
5	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1983 - 1987	30.00	150.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1982	23.00	23.00
5	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1983 - 1987	17.00	85.00
1	UNFILTERED ARSENIC AND LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1980	80.00	80.00
1	FILTERED ARSENIC AND LEAD SAMPLE + FILTER ANALYZED, Gulfport Fertilizer Sample Numbers 1981, 1988	80.00	80.00
SUBTOTAL			483.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$483.00

FILE COPY

E-mailed to Suzanne Polander 8-2-99

Lab Bench No.

II. SAMPLE IDENTIFICATION:
 Environment Condition Hot, Sunny Collected By Tony Stewart
 Where Taken Monitoring Well - Unfiltered

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other ()
V. LABORATORY: Received By Kathy Farris Date 7-26-99 Time 1045
Recorded By _____ Date Sent to State Office _____

Remarks

*Date of Test Initiation

1853 * Drinking water standards 1980

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1980
Cost Code: 3853

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer

County Code:

Discharge No:

Sample Point Identification: MW-1 Unfiltered

Requested By: Penny Johnston

Type of Sample: Grab: (X)

Composite: Flow:

NPDES Permit No.:

Date Requested: 7-26-99

Data To: Penny Johnston

Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Sunny

Where Taken: Monitoring Well 1 unfiltered

Collected By: Tony Stewart

	Type	Parameters	Preservative	Date	Time
1.	IL poly	As, Pb Total	HNO ₃	7-23-99	1110
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis

Computer Req
Code

Results

Analyst

Date

pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Kathy Farris

Recorded by: T. Sawyer

Date: 7-26-99

Time: 1045

Date Sent to State Office: 9-2-99

Remark:

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**INORGANICS REPORT
WATER**

SAMPLE No.: 1980

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/l	MQL ug/l	QC %Rec.	Analyst	Date
Arsenic	27.0	5.0	102	JC	8-17-99
Lead	27.0	5.0	104	JC	8-17-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

FILE COPY

Lab Bench No.

II. SAMPLE IDENTIFICATION:

	Type	Parameters	Preservative	Date	Time
1.	IL poly	As, Pb, total	HNO ₃ , ICE	7/23/99	1110
2.		As, Pb	ICE BT		
3.					
4.					
5.					

<u>Analysis</u>	<u>Computer Code</u>	<u>Request</u>	<u>Results</u>	<u>Analyst</u>	<u>Date</u>
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other ()
V. LABORATORY: Received By Kathy Farris Date 7-26-99 Time 1045
Recorded By _____ Date Sent to State Office _____

[illegible]

Remarks

*Date of Test Initiation

1853 * Drinking Water Standard *

1981

I. GENERAL INFORMATION:

County Code:

NPDES Permit No.:

Date Requested: 7-26-99

Type of Sample: Grab: (X)

Composite: **Flow:**

Data To: Penny Johnston
Time: Other:

Environment Condition: Hot, Sunny

Collected By: Tony Stewart

	Type	Parameters	Preservative	Date	Time
1.	IL poly	As, Pb Total	HNO ₃ ,Ice	7-23-99	1110
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis

Computer Code

Req

Results

Analyst**Date**

Code					
pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Kathy Farris

Date: 7-26-99

Time: 1045

Recorded by: T. Sawyer

Date Sent to State Office: 9-2-99

Remark:

FILE COPY

+++

**INORGANICS REPORT
WATER****SAMPLE No.:** 1981**ANALYSES:** _____**DATE COLLECTED:** _____

PARAMETER	CONC. ug/l	MQL ug/l	QC %Rec.	Analyst	Date
Arsenic	29.0	5.0	102	JC	8-17-99
Lead	27.0	5.0	104	JC	8-17-99

MQL = minimum quantifiable levels**QC %Rec = percent recovery of quality control standard****FILE COPY**

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1982
Cost Code: 3853

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer

County Code:

Discharge No:

Sample Point Identification: S56-4'

Requested By: Penny Johnston

Type of Sample: Grab: (X)

Composite: Flow:

NPDES Permit No.:

Date Requested: 7-26-99

Data To: Penny Johnston

Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Sunny

Where Taken: S 56-4'

Collected By: Collin Day

	Type	Parameters	Preservative	Date	Time
1.	8 oz.	As, Pb Total	Ice	7-23-99	1200
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis	Computer Code	Req	Results	Analyst	Date
pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Kathy Farris

Recorded by: T. Sawyer

Date: 7-26-99

Time: 1045

Date Sent to State Office: 9-2-99

Remark:

FILE COPY

INORGANICS REPORT
SOIL/SEDIMENT

SAMPLE No.: 1982

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	ND	.5	103	GB	8-4-99
Lead	1.50	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

FILE COPY

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1983
Cost Code: 3853

I. GENERAL INFORMATION:

Facility Name:
County Code:
Discharge No:
Sample Point Identification: S46-2'
Requested By: Penny Johnston
Type of Sample: Grab: (X)

NPDES Permit No.:
Date Requested: 7-26-99

Composite: Flow: Data To: Penny Johnston
Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Sunny
Where Taken: S 46-2'

Collected By: Collin Day

	Type	Parameters	Preservative	Date	Time
1.	8 oz.	As, Pb Total	Ice	7-23-99	1340
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis	Computer Code	Req	Results	Analyst	Date
pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus: RO Vehicle: Other:

V. LABORATORY:

Received by: Kathy Farris
Recorded by: T. Sawyer

Date: 7-26-99 Time: 1045
Date Sent to State Office: 9-2-99

Remark:

FILE COPY

**INORGANICS REPORT
SOIL/SEDIMENT**

SAMPLE No.: 1983

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	2.0	.5	103	GB	8-4-99
Lead	17.0	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

FILE COPY

Lab Bench No.

II. SAMPLE IDENTIFICATION:

Where Taken	Type	Parameters	Preservative	Date	Time
8-74-4					

Remarks

*Date of Test Initiation

1853

1984

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

**Lab Bench No.: 1984
Cost Code: 3853**

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer

County Code:

Discharge No:

Sample Point Identification: S74-4'

Requested By: Penny Johnston

Type of Sample: Grab: (X)

Composite: Flow:

NPDES Permit No.:

Date Requested: 7-26-99

Data To: Penny Johnston

Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Sunny

Where Taken: S 74-4'

Collected By: Collin Day

	Type	Parameters	Preservative	Date	Time
1.	8 oz.	As, Pb Total	Ice	7-23-99	1445
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis	Computer Code	Req	Results	Analyst	Date
pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Kathy Farris

Recorded by: T. Sawyer

Date: 7-26-99

Time: 1045

Date Sent to State Office: 9-10-99

Remark:

INORGANICS REPORT
SOIL/SEDIMENT

SAMPLE No.: 1984

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	ND	.5	103	GB	8-4-99
Lead	2.0	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1985
Cost Code: 3853

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer

County Code:

Discharge No:

Sample Point Identification: S 96-2'

Requested By: Penny Johnston

Type of Sample: Grab: (X)

Composite: Flow:

NPDES Permit No.:

Date Requested: 7-26-99

Data To: Penny Johnston

Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Sunny

Where Taken: S 96-2'

Collected By: Collin Day

	Type	Parameters	Preservative	Date	Time
1.	8 oz.	As, Pb Total	Ice	7-23-99	1727
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis	Computer Code	Req	Results	Analyst	Date
pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Kathy Farris

Recorded by: T. Sawyer

Date: 7-26-99

Time: 1045

Date Sent to State Office: 9-2-99

Remark:

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**INORGANICS REPORT
SOIL/SEDIMENT**

SAMPLE No.: 1985

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	ND	.5	103	GB	8-4-99
Lead	2.0	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

FILE COPY

Lab Bench No.

1986

FILE COPY

FILE COPY

**INORGANICS REPORT
SOIL/SEDIMENT**

SAMPLE No.: 1986

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	ND	.5	103	GB	8-4-99
Lead	2.0	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

FILE COPY

Lab Bench No.

II. SAMPLE IDENTIFICATION:
 Environment Condition Hot, Sunny
 Where Taken S1310-4 Collected By Collin Day

III. FIELD:					
<u>Analysis</u>	<u>Computer Code</u>	<u>Request</u>	<u>Results</u>	<u>Analyst</u>	<u>Date</u>
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l		*
COD	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
		()			
		()			
		()			
		()			
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		()			

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*Date of Test Initiation

1853

1987

~~FILE COPY~~

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1987
Cost Code: 3853

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer
County Code:
Discharge No:
Sample Point Identification: S 1210-4'
Requested By: Penny Johnston
Type of Sample: Grab: (X)

NPDES Permit No.:
Date Requested: 7-26-99

Data To: Penny Johnston
Time: Other:

Composite: Flow:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Sunny
Where Taken: S 1210-4'

Collected By: Collin Day

	Type	Parameters	Preservative	Date	Time
1.	8 oz.	As, Pb Total	Ice	7-23-99	1933
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis	Computer Code	Req	Results	Analyst	Date
pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Kathy Farris
Recorded by: T. Sawyer

Date: 7-26-99 Time: 1045
Date Sent to State Office: 9-2-99

Remark:

FILE COPY

**INORGANICS REPORT
SOIL/SEDIMENT**

SAMPLE No.: 1987

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	ND	.5	103	GB	8-4-99
Lead	2.2	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

FILE COPY

Lab Bench No.

II. SAMPLE IDENTIFICATION:

Type	Parameters	Preservative	Date	Time
------	------------	--------------	------	------

5. FIELD:

TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other ()

Computer _____ Date _____

_____ () _____ () _____

1988

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1988
Cost Code: 3853

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer

County Code:

Discharge No:

Sample Point Identification: MW-1 Filter

Requested By: Penny Johnston

Type of Sample: Grab: (X)

Composite: Flow:

NPDES Permit No.:

Date Requested: 7-26-99

Data To: Penny Johnston

Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Sunny

Where Taken: MW-1 filter from filtered sample

Collected By: Collin Day

	Type	Parameters	Preservative	Date	Time
1.	8 oz. Poly-filter inside	As, Pb Total	Ice	7-23-99	1110
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis Computer Req Results Analyst Date

	Code				
pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Kathy Farris

Recorded by: T. Sawyer

Date: 7-26-99

Time: 1045

Date Sent to State Office: 9-2-99

Remark:

FILE COPY

INORGANICS REPORT
SOIL/SEDIMENT

SAMPLE No.: 1988 (filter)

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	0.82	.5	103	GB	8-4-99
Lead	0.60	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

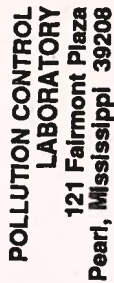
FILE COPY

MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

CHAIN OF CUSTODY RECORD

[illegible]

NOTICE: Must use a separate form for each Ice chest.

MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

SHIPPED TO:

SAMPLE TYPES

SAMPLE TYPES

SAMPLERS (SIGN)

1. SURFACE WATER
2. GROUND WATER
3. POTABLE WATER
4. WASTEWATER
5. LEACHATE
6. SOIL/SEDIMENT
7. SLUDGE
8. WASTE
9. AIR
10. FISH

A. Callinectes

SITE NO.

ETN

DATE _____

TIME

CO
GR **STATION LOCATION/DESCRIPTION** |

DATA TO:

CIRCLE/ADD
parameter
desired. List
no. of con-
tainers
submit-
ted.

ANALYSIS

parameter	no. of containers submitted.
COO TOC NUTRIENTS	
BOD, SOLIDS	
METALS (total) (mg/L)	
EXT. ORGANISMS (colony)	
PUNG. AROMATICS/ HALOCARBONS	
CYANIDES	

REC'D COLIFORM

DATE	TIME	LOCATION	REMARKS
11/7/79	1915	HTPH	11/7/79

**LAB
USE
ONLY**

REMARKS

1980	1981	1982	1983	1984	1985	1986	1987	1988
------	------	------	------	------	------	------	------	------

FILE COPY

RELINQUISHED BY:

DATE/TIME

RECEIVED BY:

1

RELINQUISHED BY:

[illegible]

10

3

(SIGN) 704414

10112

(SIGN) ka

22

SIGNI

1

SIGN

NOTICE: Must use a separate form for each Ice chest.

White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab;
White copy is returned to samplers. Pink copy retained by samplers.

PAGE _____ OF _____

3/91

Lab Bench No.

1780

Lab Bench No.

II. SAMPLE IDENTIFICATION:

Environment Condition Hot, sunny Collected By Colin D. ...
Where Taken 551-117

	Type	Parameters	Preservative	Date	Time
1.	20	A, 115, 1000	Ice	7/23/99	1200
2.					
3.					
4.					
5.					

III. FIELD:

<u>Analysis</u>	<u>Computer Code</u>	<u>Request</u>	<u>Results</u>	<u>Analyst</u>	<u>Date</u>
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other ()

V. LABORATORY: Received By Bailey Date 7-21-99 Time 1045
Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l		*
COD	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
		()			
		()			
		()			
		()			
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		()			

FILE COPY

Remarks

*Date of Test Initiation

FILE COPY

1982

Lab Bench No.

FILE COPY

Invoice

Invoice Number:
Date: August 2, 1999

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 1935 - 1939	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1935	40.00	40.00
4	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1936 - 1939	30.00	120.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1935	23.00	23.00
4	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1936 - 1939	17.00	68.00
1	TCLP SAMPLE ANALYZED FOR ARSENIC AND LEAD, Gulfport Fertilizer Sample Number 1937	113.00	113.00
2	TCLP SAMPLES ANALYZED FOR ARSENIC AND LEAD, Gulfport Fertilizer Sample Numbers 1938 - 1939	97.00	194.00
SUBTOTAL			583.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$583.00

FILE COPY

E-mailed to Suzanne Polander 8-2-99

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

**Lab Bench No.: 1935
Cost Code: 3853**

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer

County Code:

Discharge No:

Sample Point Identification: S26-4'

Requested By: Penny Johnston

Type of Sample: Grab: (X)

Composite: **Flow:**

NPDES Permit No.:

Date Requested: 7-21-99

Data To: Penny Johnston

Time:(X) **Other:**

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Overcast

Where Taken:S26-4

Collected By: CD, RG

	Type	Parameters	Preservative	Date	Time
1.	8 oz.	As, Pb, Total	Ice	7-19-99	1635
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis Computer Req Results Analyst Date

Code

pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Otis Clark

Recorded by: T. Sawyer

Date: 7-21-99

Date Sent to State Office:

Time: 0800

9-10-99

Remark:

+++

**INORGANICS REPORT
SOIL/SEDIMENT****SAMPLE No.:** 1935**ANALYSES:** _____**DATE COLLECTED:** _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	20.0	.5	103	GB	8-4-99
Lead	0.90	.5	104	GB	8-4-99

MQL = minimum quantifiable levels**QC %Rec = percent recovery of quality control standard**

NPDES Permit No.:
Date Requested: 7-21-99

Data To: Penny Johnston
Time: (X) Other:

Facility Name: Gulfport Fertilizer
County Code:
Discharge No:
Sample Point Identification: S26-2'
Requested By: Penny Johnston
Type of Sample: Grab: (X)

Environment Condition: Hot, Overcast
Where Taken: S26-4

NPDES Permit No.:
Date Requested: 7-21-99

III. FIELD:

IV. TRANSPORTATION OF SAMPLE:

RO Vehicle:

Other:

Received by: Otis Clark
Recorded by: T. Sawyer

Time: 0800**Date Sent to State Office:**

9-10-99

Remark:

**INORGANICS REPORT
SOIL/SEDIMENT****SAMPLE No.:** 1936**ANALYSES:** _____**DATE COLLECTED:** _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	1.30	.5	103	GB	8-4-99
Lead	1.40	.5	104	GB	8-4-99

MQL = minimum quantifiable levels**QC %Rec = percent recovery of quality control standard**

Remark: TCLP will be delayed due to fume hood malfunction. We will forward ASAP.

INORGANICS REPORT
SOIL/SEDIMENT

SAMPLE No.: 1937

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	3.0	.5	103	GB	8-4-99
Lead	9.1	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1938
Cost Code: 3853

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer

County Code:

Discharge No:

Sample Point Identification: T450S-2'

Requested By: Penny Johnston

Type of Sample: Grab: (X)

Composite: Flow:

NPDES Permit No.:

Date Requested: 7-21-99

Data To: Penny Johnston

Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Overcast

Where Taken: T450 S-2'

Collected By: CD, RG

	Type	Parameters	Preservative	Date	Time
1.	8 oz.	As, Pb, Total & TCLP	Ice	7-19-99	1520
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis

Computer
Code

Req

Results

Analyst

Date

pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Otis Clark

Recorded by: T. Sawyer

Date: 7-21-99

Time: 0800

Date Sent to State Office: 9-10-99

Remark: TCLP will be delayed due to fume hood malfunction. We will forward ASAP.

**INORGANICS REPORT
SOIL/SEDIMENT**

SAMPLE No.: 1938

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	3.0	.5	103	GB	8-4-99
Lead	10.0	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

QC %Rec = percent recovery of quality control standard

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1939
Cost Code: 3853

I. GENERAL INFORMATION:

Facility Name: Gulfport Fertilizer
County Code:
Discharge No:
Sample Point Identification: T450 E-2'
Requested By: Penny Johnston
Type of Sample: Grab: (X) Composite: Flow:

NPDES Permit No.:
Date Requested: 7-21-99

Data To: Penny Johnston
Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Hot, Overcast
Where Taken: T450 E-2'

Collected By: CD, RG

	Type	Parameters	Preservative	Date	Time
1.	8 oz.	As, Pb, Total & TCLP	Ice	7-19-99	1335
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis	Computer Code	Req	Results	Analyst	Date
pH	000400				
D.O.	000300				
Temperature	000010				
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus: RO Vehicle: Other:

V. LABORATORY:

Received by: Otis Clark
Recorded by: T. Sawyer

Date: 7-21-99 Time: 0800
Date Sent to State Office: 9-10-99

Remark: TCLP will be delayed due to fume hood malfunction. We will forward ASAP.

TARGET COMPOUND LIST
INORGANICS REPORT
SOIL/SEDIMENT

SAMPLE No.: 1939

ANALYSES: _____

DATE COLLECTED: _____

PARAMETER	CONC. ug/g	MQL ug/g	QC %Rec.	Analyst	Date
Arsenic	36.5	.5	103	GB	8-4-99
Lead	1,632	.5	104	GB	8-4-99

MQL = minimum quantifiable levels

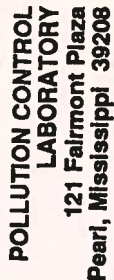
QC %Rec = percent recovery of quality control standard



CHAIN OF CUSTODY RECORD

MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY[illegible]

NOTICE: Must use a separate form for each Ice chest.

MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

CHAIN OF CUSTODY RECORD

[illegible]

NOTICE: Must use a separate form for each Ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

Uncontrolled Site Voluntary Remediation Program §17-17-54 Application Form

Facility or Site Data

Site Name	Gulfport Fertilizer Company				
Owner of Site	Hancock Bank of Gulfport, Mississippi				
Address of Site (Street)	33rd Street				
City of Site	Gulfport	State	MS	Zip	
County	Barrison				
Contact Person for Site	Andy Alfonso	Phone	228 601-868-4594 4361	Fax	
Mailing Address	P.O. Box 4019				
City	Gulfport	State	MS	Zip	39502-4019
Soil Contaminant	Lead, Arsenic	Surface Water Contaminant	N/A		
Ground Water Contaminant	Lead, Arsenic	Air Contaminant	N/A		
Latitude (Field Verified)*	30 °	23 ' 42 . 00 "	Longitude (Field Verified)*	89 °	06 ' 48 . 00 "

*Location of Highest Concentration of Contamination in Degrees, Minutes, and Seconds to 2 decimal places (i.e., 33° 53' 21.55")

Party Assuming Responsibility for MDEQ Oversight Costs

Name	Hancock Bank of Gulfport, Mississippi				
Address (Street and P.O. Box)	P.O. Box 4019				
City	Gulfport	State	MS	Zip	39502-4019
Contact Person	Andy Alfonso	Phone	228 601-868-4594 4445	Fax	
Relationship to Site, (i.e., Owner, Lessee, Potential Buyer, Seller)	Vice President - Other Real Estate				

Financial Contact (for Payment of MDEQ Invoice)

Firm	Hancock Bank of Gulfport, Mississippi				
Address for Invoice	P. O. Box 4019, Gulfport, Mississippi 39502-4019				
City	Gulfport	State	MS	Zip	39502-4019
Contact Person	Andy Alfonso	Phone	228 601-868-4594 4445	Fax	228-868-4446

Environmental Consultant

Firm	Butler Services of Mississippi, Inc.				
Address	P.O. Box 1164				
City	Pascagoula	State	MS	Zip	39568-1164
Contact Person	Barton Bates	Phone	228-769-6983	Fax	228-769-1219

Legal Counsel

Firm's Name	Broadbent, Grantham, Greer & Reeves, PLLC				
Address	11400 Trustmark Building, 248 East Capitol Street				
City	Jackson	State	MS	Zip	39201
Contact Attorney	Trudy D. Fisher	Phone	601-960-6846	Fax	601-960-6802

Please Print or Type Responses

Form Revision Date 3/12/97

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/855

No. 0172541

HANCOCK BANK \$6,500dols00cts

DATE

AMOUNT

11/09/98

****6,500.00

PAY
TO THE ORDER OF DEPARTMENT OF ENVIRONMENT QUALITY
OF:

OFFICIAL EXPENSE CHECK
FOR VICE PRESIDENT-COMPTROLLER

⑈0172541⑈ ⑆065503681⑆ 01 0129100⑈

George A. Schlegel

**THIS FILE IS
CLOSED**

ENCLOSED DATED MATERIAL

From: November 4, 1998
To: May 10, 2000

**MORE RECENT MATERIAL
IN OTHER FILE**

POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MS DEPT ENV

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL

No. 2058

Invoice
37469811
37469812

Reference

Inv Date
05/08/00
05/08/00

Amount Paid
187.5
787.5

Check Date = 05/09/00

Check Total =

975.0



HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 20581:

HANCOCK BANK \$975dols00cts

PAY
TO THE
ORDER
OF:

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY
OAS, ATTN: FEE SECTION
P.O. BOX 20325
JACKSON, MS 39289-1325

DATE

05/09/00

AMOUNT

*****975.00

⑈020581⑈ ⑆06550368⑆ 01 0129100⑈

George A. Fehse

FILE COPY



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

April 28, 2000

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469812

10.5 Staff hours @ \$75.00/Hr. for 03/00 \$787.50

Current Amount Due \$787.50

Past due: Invoice #37469811 dated 03/31/00 for: \$187.50

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$975.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy



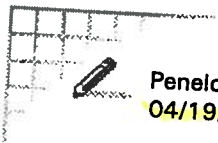
ButlerMS@aol.com on 04/19/2000 05:15:16 PM

To: Penelope Johnston/HW/OPC/DEQ@DEQ
cc:
Subject: Re: Additional Information

FILE COPY

Penny,
Kevin took the samples and I believe he ran a composite. I will check the
paperwork and also talk to him as we are supposed to be in the area tomorrow.

louis



Penelope Johnston
04/19/2000 09:32 AM

To: ButlerMS@aol.com
cc:
Subject: Additional Information

FILE COPY

Denton and Louis,

Good morning! I was reviewing the e-mail I sent last week requesting additional information and realized I left something off. During our conversation we discussed the fact that there were 4 soil drums and 2 purge/decon water drums on the site for removal prior to the theft. I was only able to locate analytical results and chain of custody forms for 1 soil drum and 1 purge/decon water drum. I need the analytical results and chain of custody forms for the other 3 soil drums and 1 purge/decon water drum. Please let me know if you have any questions.

Penny



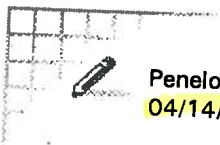
ButlerMS@aol.com on 04/17/2000 07:44:48 AM

To: Penelope Johnston/HW/OPC/DEQ@DEQ
cc:
Subject: Re: Gulfport Data

FILE COPY

Penny,
Advised Denton about e-mail Saturday morning & we will start looking up info later today or in the morning. We are going to be in Gulfport this morning so I will go by the PD and get a copy of the offense report.

Louis Fortenberry



Penelope Johnston

04/14/2000 04:24 PM

To: ButlerMS@aol.com
cc:
Subject:

FILE COPY

Denton,

Per our conversation yesterday, here is some of the information I need.

1. The following field duplicate sample data should be included on all figures. If field duplicate samples other than those listed here were collected their analytical data should also be included on all figures.

31S62-2'

S40-2'

S40-4'

S55-2'

S55-4'

S75-2'

S98-2'

S112-2'

~~S124-2'~~

S128-2' P.J. 4-14-00

2. Sample 31S33-2 Dup is listed on the chain of custody forms. I am unable to locate any analytical data for this sample. Please provide the analytical results for this sample.

3. The following samples are reported on analytical sheets and chain of custody forms, but the depth of sample collection is not indicated on either. Please provide depth of sample collection.
21S51 & 21S61

4. A copy of the signed Health and Safety Form.

5. A copy of the police report for the stolen drums.

6. Boring logs for samples collected Sept. 30 - Oct. 1, 1998, Oct. 21, 1998, and Feb. 12, 1999 if available.

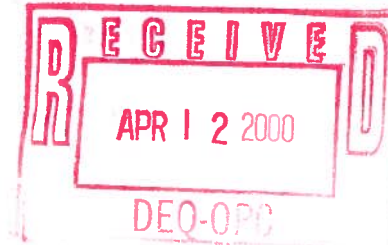
7. Two sets of the corrected figures.

Please don't hesitate to call if you have any questions.

Penny



DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, ALABAMA 36628-0001



REPLY TO
ATTENTION OF:

March 1, 2000

Regulatory Branch
Operations Division

SUBJECT: Nationwide Permit Authorization for Proposed
Wetland Impacts on 33-Acre Parcel of Property Adjacent to
33rd Avenue, Gulfport, Mississippi - Jurisdictional Number
MSJ00-00679-T

FILE COPY

Butler Services of Mississippi, Inc.
Attention: Mr. Louis Fortenberry
Post Office Box 1164
Pascagoula, Mississippi 39568-1164

Dear Mr. Fortenberry:

Reference is made to your request for a jurisdictional determination concerning the proposed development ('remedial action') of 0.23-acres of wetlands located in the northwestern portion of a 33-acre parcel of property (old 'razed' fertilizer plant facility) adjacent to 33rd Avenue, Gulfport, Mississippi (see enclosed copy of letter). Specifically the property is located within Section 33, Township 7 South, Range 11 West, Harrison County, Mississippi. Further reference is made to the on-site meeting of January 26, 2000, between you and Mr. Frank Hubiak, a member of my staff, concerning the property.

This letter verifies that the proposed activity is already authorized by Nationwide Permit Number 26 in accordance with 33 CFR Part 330 of our regulations provided less than 0.33-acres of wetlands are impacted on the 'entire' parcel of property. A copy of the permit is enclosed with the appropriate sections marked for your reference. Further authorization from this office is not required provided the scope of work is in accordance with your submitted plans and the Nationwide Permit conditions.

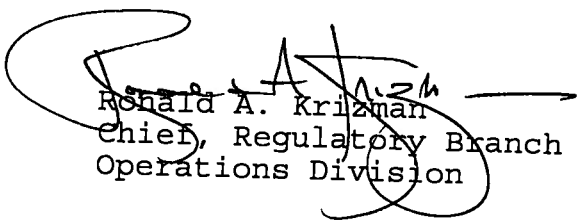
The statements contained herein do not convey any property rights, or any exclusive privileges, and do not authorize any injury to property or obviate the requirements to obtain other local, State or Federal assent required by law.

The enclosed Notice of Authorization must be posted at the site during construction of the permitted activity. If the scope of work or project location changes, you are urged to contact this office for a verification of this determination.

Please be advised that this jurisdictional determination reflects current policy and regulations. This Nationwide Permit authorization is scheduled to expire April 14, 2000. The verification will remain in effect until February 11, 2002.

If you have any questions or require further information concerning this matter, please contact Mr. Frank Hubiak of the Enforcement Section at (334) 690-3186.

Sincerely,



Ronald A. Krizman
Chief, Regulatory Branch
Operations Division

Enclosure



This notice of authorization must be
conspicuously displayed at the site of work.

United States Army Corps of Engineers

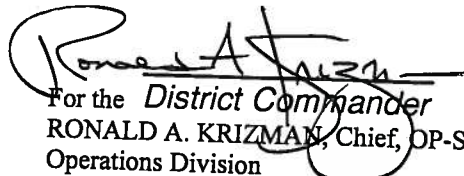
March 1, 200

A permit to perform work authorized by statutes and regulations of the Department of the Army
at Section 33, Township 7 South, Range 11 West, Harrison County, Mississippi

has been issued to Butler Services of Mississippi, Inc. on March 1, 2000
on property adjacent to 33rd Avenue, Gulfport, Mississippi
Address of Permittee Post Office Box 1164, Pascagoula, Mississippi 39568-1164

Permit Number

MSJ00-00679-T


For the *District Commander*
RONALD A. KRIZMAN, Chief, OP-S
Operations Division

ENG FORM 4336, Jul 81 (33 CFR 320-330) EDITION OF JUL 70 MAY BE USED

(Proponent: CECW-0)

FAX

FILE COPY

to - Project Engi Penny Johnston

fax number - 1-601-961-5300

phone number -

from - Louis W. Fortenberry

fax number - (228) 769-1219

phone number - (228) 769-6983

number of pages - 1

date - 4/11/00

Corp Letter



Penny,
Maybe the third time is the charm, anyway I am mailing you a copy also . We will be trying to contact you by telephone later today so Denton can answer several questions you had.

Louis Fortenberry

**DEPARTMENT OF THE ARMY**

MOBILE DISTRICT, CORPS OF ENGINEERS

P.O. BOX 2288

MOBILE, ALABAMA 36628-0001

REPLY TO
ATTENTION OF

March 1, 2000

Regulatory Branch
Operations Division

SUBJECT: Nationwide Permit Authorization for Proposed
Wetland Impacts on 33-Acre Parcel of Property Adjacent to
33rd Avenue, Gulfport, Mississippi - Jurisdictional Number
MSJ00-00679-T

Butler Services of Mississippi, Inc.
Attention: Mr. Louis Fortenberry
Post Office Box 1164
Pascagoula, Mississippi 39568-1164

Dear Mr. Fortenberry:

Reference is made to your request for a jurisdictional determination concerning the proposed development ('remedial action') of 0.23-acres of wetlands located in the northwestern portion of a 33-acre parcel of property (old 'razed' fertilizer plant facility) adjacent to 33rd Avenue, Gulfport, Mississippi (see enclosed copy of letter). Specifically the property is located within Section 33, Township 7 South, Range 11 West, Harrison County, Mississippi. Further reference is made to the on-site meeting of January 26, 2000, between you and Mr. Frank Hubiak, a member of my staff, concerning the property.

This letter verifies that the proposed activity is already authorized by Nationwide Permit Number 26 in accordance with 33 CFR Part 330 of our regulations provided less than 0.33-acres of wetlands are impacted on the 'entire' parcel of property. A copy of the permit is enclosed with the appropriate sections marked for your reference. Further authorization from this office is not required provided the scope of work is in accordance with your submitted plans and the Nationwide Permit conditions.

The statements contained herein do not convey any property rights, or any exclusive privileges, and do not authorize any injury to property or obviate the requirements to obtain other local, State or Federal assent required by law.

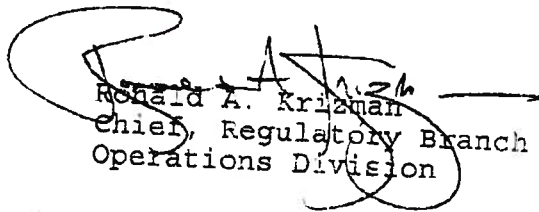
-2-

The enclosed Notice of Authorization must be posted at the site during construction of the permitted activity. If the scope of work or project location changes, you are urged to contact this office for a verification of this determination.

Please be advised that this jurisdictional determination reflects current policy and regulations. This Nationwide Permit authorization is scheduled to expire April 14, 2000. The verification will remain in effect until February 11, 2002.

If you have any questions or require further information concerning this matter, please contact Mr. Frank Hubiak of the Enforcement Section at (334) 690-3185.

Sincerely,



Richard A. Krizan
Chief, Regulatory Branch
Operations Division

Enclosure



**This notice of authorization must be
conspicuously displayed at the site of work.**

United States Army Corps of Engineers

March 1, 2000

A permit to perform work authorized by statutes and regulations of the Department of the Army
at Section 33, Township 7 South, Range 11 West, Harrison County, Mississippi

has been issued to Butler Services of Mississippi, Inc. ON March 1, 2000
on property adjacent to 33rd Avenue, Gulfport, Mississippi
Address of Permittee Post Office Box 1164, Pascagoula, Mississippi 39568-1164

Permit Number

MSJ00-00679-T

[Signature]
For the *District Commander*
RONALD A. KRIZMAN, Chief, OP-S
Operations Division

ENG FORM 4336, Jul 81 (33 CFR 320-330) EDITION OF JUL 70 MAY BE USED

(Precedent: GECW-C)



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

March 31, 2000

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469811

2.5 Staff hours @ \$75.00/Hr. for 02/00	\$187.50
Total Amount Due	<u>\$187.50</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$187.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

RECEIVED
MAR 14 2000
Dept. of Environmental Quality
Office of Pollution Control

March 10, 2000

Ms. Penelope A. Johnston, Project Officer
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

FILE COPY

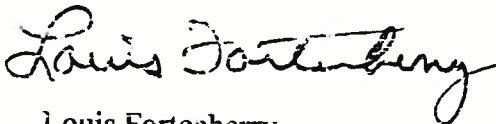
RE: Former Gulfport Fertilizer Plant, Gulfport, Mississippi

Dear Penny:

Attached is a copy of the Corp of Engineers permit to excavate and fill the small area of wetland located on the Northwest side of the Gulfport Fertilizer site. The Corp elected to use the NW 26 rather than NW 38, which is fine with us. If it becomes necessary to excavate and fill the area in the Southwest side of the property additional authority will be needed and if the permitted area exceeds 1/3 of an acre, mitigation will be required. We discussed this before filing for the permit and decided there was no need to permit the southern portion as it was most unlikely remediation would be required in that area.

If you have any questions, please call.

Sincerely



Louis Fortenberry

BUTLER SERVICES OF MISSISSIPPI, INC.

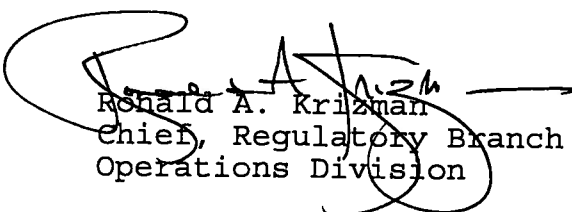
CC: Mr Charles Webb, Executive Vice President, The Hancock Bank w/attachments

The enclosed Notice of Authorization must be posted at the site during construction of the permitted activity. If the scope of work or project location changes, you are urged to contact this office for a verification of this determination.

Please be advised that this jurisdictional determination reflects current policy and regulations. This Nationwide Permit authorization is scheduled to expire April 14, 2000. The verification will remain in effect until February 11, 2002.

If you have any questions or require further information concerning this matter, please contact Mr. Frank Hubiak of the Enforcement Section at (334) 690-3186.

Sincerely,



Ronald A. Krizman
Chief, Regulatory Branch
Operations Division

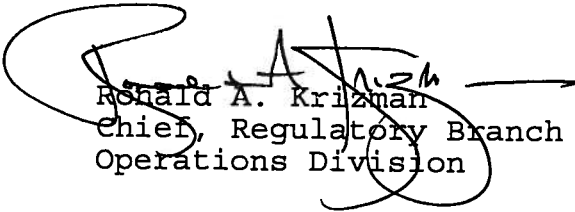
Enclosure

The enclosed Notice of Authorization must be posted at the site during construction of the permitted activity. If the scope of work or project location changes, you are urged to contact this office for a verification of this determination.

Please be advised that this jurisdictional determination reflects current policy and regulations. This Nationwide Permit authorization is scheduled to expire April 14, 2000. The verification will remain in effect until February 11, 2002.

If you have any questions or require further information concerning this matter, please contact Mr. Frank Hubiak of the Enforcement Section at (334) 690-3186.

Sincerely,



Ronald A. Krizman
Chief, Regulatory Branch
Operations Division

Enclosure



**This notice of authorization must be
conspicuously displayed at the site of work.**

United States Army Corps of Engineers

March 1, 2000

A permit to perform work authorized by statutes and regulations of the Department of the Army

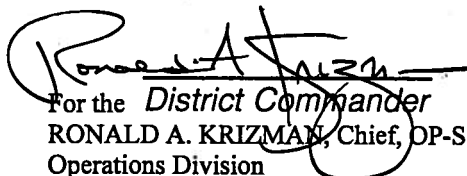
at Section 33, Township 7 South, Range 11 West, Harrison County, Mississippi

has been issued to Butler Services of Mississippi, Inc. ON March 1, 2000
on property adjacent to 33rd Avenue, Gulfport, Mississippi

Address of Permittee Post Office Box 1164, Pascagoula, Mississippi 39568-1164

Permit Number

MSJ00-00679-T


For the *District Commander*
RONALD A. KRIZMAN, Chief, OP-S
Operations Division

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594
MS DEPT ENV MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL

No. 202443

Invoice
37469810

Reference

Inv Date
03/07/00

Amount Paid
2,137.50

Check Date = 03/09/00

Check Total = 2,137.50

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 202443

HANCOCK BANK \$2,137dols50cts

DATE
03/09/00

AMOUNT
****2,137.50

PAY
TO THE
ORDER
OF:

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY
OAS, ATTN: FEE SECTION
P.O. BOX 20325
JACKSON, MS 39289-1325

⑈0202443⑈ ⑆065503681⑆ 01 0129100⑈

George A. Schlergel

FILE COPY





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

February 29, 2000

Program: Uncontrolled Sites Voluntary Evaluation Program

FILE COPY

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469810

28.5 Staff hours @ \$75.00/Hr. for 01/00	\$2,137.50
Total Amount Due	<u>\$2,137.50</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$2,137.50 to the Mississippi Department of Environmental Quality at the following address:

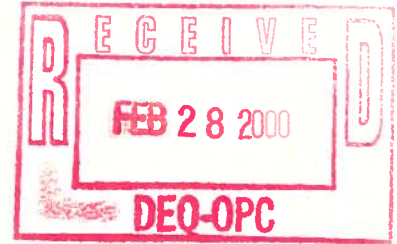
MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

Butler Services of Mississippi, Inc.

- Environmental Consulting Services -

February 21, 2000



Ms Penelope "Penny" Johnston, Environmental Engineer
Mississippi Department of Environmental Quality
Uncontrolled Sites Section
P.O. Box 10385
Jackson, MS 39289-0385

FILE COPY

Dear Penny,

Attached is a copy of "notice of intent" letter as provided for under the Nation Wide permit program that authorizes dredge and fill activities in tracts of less than three acres. A 24 X 30 CAD drawing was provided to the Corp for their use and a 11 X 17 provided to you and the Hancock Bank for your files. We will be please to print and forward you a large copy if needed.

We sent WOC Inc. of Gautier out last week to pick up the drums at the site with the soil being carried to Pecan Grove for disposal and the water being brought back to WOC Inc site for treatment in their facility then discharge into the Gautier Utility District system. The driver called me from the site saying he could only find one (1) drum. I had him search the area for the missing drums or any evidence that they had been dumped on site. He did not find any evidence nor did I at a later date. I instructed him to take the one (1) drum on to Pecan Grove Landfill as authorized and return the paperwork to me. I went to the North Gulfport Police substation and filled out an offense report stating five steel drums marked hazardous waste has been stolen from the site, I also explained , the waste was not hazardous but the idiots that stole the drums could not have known that. The thief report was taken by officer C. Young ID # 639 with the offense report being # 00-015068. I do not have a copy of the report because I would have had to go back the next day after 11:00AM to get a copy. If you want a copy, I will get one for you the next trip to Gulfport, probably later in the week, just let me know.

Sincerely

Louis Fortenberry

**WASTE MANAGEMENT**

Emelle Treatment Facility
Highway 17 N., Mile Marker 163
P.O. Box 55
Emelle, AL 35459
(205) 652-9721

October 18, 1999

Mr. Louis Fortenberry
Butler Services of Mississippi, Inc.
P.O. Box 1164
Pascagoula, MS 39568-1164

CONFIRMATION LETTER

WMI of Mississippi is pleased to confirm that your Special Waste has been approved for disposal at our Pecan Grove Sanitary Landfill located in Pass Christian, Mississippi, subject to the terms of the Disposal Service Agreement.

GENERATOR:

Hancock Bank - Gulfport, MS

WASTE NAME**PROFILE****EXPIRATION**

Soil Borings

CN2686

April 30, 2000

Disposal Price:

\$ 36.00/Drum
\$200.00/Load - Minimum

Mississippi Solid Waste Fee:

\$ 1.00/Ton

CONDITIONS:

No free liquids approved.

***WASTE PRICED AS PROFILED - INVOICED AS RECEIVED**

The price is, however, subject to change by WMI of Mississippi as described in our Disposal Service Agreement.

A copy of your approved Waste Profile Sheet has been included for your files.

Thank you for this opportunity to be of service. If you should have any questions please feel free to call me at (800)652-5755.

Sincerely,


Suzy Thomas
Customer Service Representative

Attachment

cc: Pecan Grove Landfill



A Waste Management Company

2/7 ~~18~~ 2000
35206

NON-HAZARDOUS MANIFEST

WM CN 2686

GENERATOR

Generator Hancock Bank
Address 33rd St.
Gulfport, MS 39501
Phone (228) 769-6983

I.D.# _____
Shipping Location Gulfport Fertilizer Plant
Address 33rd St.; Gulfport, MS 39501
Phone Same

Description of Waste Materials	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil Boring	WMCN2686	01	55G	Drum

I hereby certify that the above described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable regulations.

Dan Cambre (As Agent)

Generator Authorized Agent Name (Print)

Signature

2/8/00
Delivery Date

TRANSPORTER

Transporter Name Waste Oil Collectors, Inc.
Address 4001 Old Spanish Trail
Gautier, MS 39553

Driver Name (Print) Chad Thomas
Truck Number WOCI #1
Truck Type Pick-up

I hereby acknowledge receipt of the above described materials for transport from the generator site listed above.

I hereby acknowledge that the above described materials were received from the generator site were transported without incident to the destination listed below.

Chad Thomas 2-8-00
Driver Signature Shipment Date

Chad Thomas 2-8-00
Driver Signature Delivery Date

DESTINATION

Site Name Pecan Grove RDF Phone Number (601) 255-5553
Address 9685 Firetower Road, Pass Christian, MS 39571
Disposal Locations: Cell 10 Grid Q18 Level 3

I hereby acknowledge receipt of the above described materials.

G. Callwell [Signature] 2-8-00
Name of Authorized (Print) Signature Receipt Date

WHITE - ORIGINAL

YELLOW - DIVISION

PINK - GENERATOR

GOLD - TRANSPORTER

DRIVER: PLEASE SIGN HERE

Chris Thomas

rove Landfill
retower Road
ristian, MS 39571-0000

Page: 01 of 01

TICKET NBR

037375A

ORIGINAL

HAULER NAME	TRUCK #	OPERATOR	TIME IN	TIME OUT	DATE
TRUCK HAULER	TRUCK	DEB	9:18AM	9:34AM	2/28/2000

WCDCK BANK
01401

GROSS Lbs. : 6,760.00IN-1
TARE Lbs. : 6,520.00OUT-1
NET Lbs. : 240.00

ROLL OFF BOX
"LAISSEZ BON TEMPS ROULE"

ADJUSTED Lbs. : 240.00

SOURCES		OTHER INFORMATION		
GULFPORT		SOIL BORING		
		35206		
		CELL GRID: CELL-10-013-LEV3		
MATERIAL CODE/DESCRIPTION	QUANTITY	MEASURE	RATE	AMOUNT
220 SPECIAL WASTE BY DRUMS	1.00	DRUMS	\$199.8801	\$199.88
NO TAXES APPLICABLE	0.12	Tons	\$1.000	\$0.12
SPECIAL WASTE FEE				0000.00
TOTAL AMOUNT				

Butler Services of Mississippi, Inc.

- Environmental Consulting Services -

February 21, 2000

Col. Ron Krizman
Department of the Army
Mobile District, Corp of Engineers
P.O. Box 2288
Mobile, Al 36628-0001

RE: MSJ00-00128-1
Former Gulfport Fertilizer Site
Adjacent to 33rd Street
Gulfport, Ms

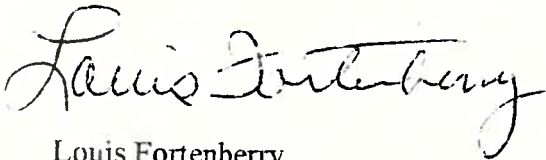
Dear Col. Krizman,

D.R. Sanders & Associates completed a delineation of wetlands on the +/-33 acre tract located in Gulfport, Ms. Butler Services mapped the area determined by Sanders and Associates to be wetland on the attached CAD drawing with the total acreage that could possibly be impacted as 1.55 acres. In discussions with Ms Penny Johnston, MDEQ uncontrolled sites section, the 1.32 acre wetland tract near the Southwest corner of the parcel is not expected to be impacted by remediation that may be required on the Northwest side of the parcel.

We are therefore using this means as notification under the Nation wide permit system of intent to excavate/fill less than .33 acres (.23). Should this change for any reason we will amend our request which due to nature of the site (hazardous) and maximum possible impact (1.55 ac) will still be covered by a Nation wide permit

Thank you for responding to Mississippi Department of Environmental Quality, uncontrolled sites section in such a timely manner.

Sincerely



Louis Fortenberry

CC: Ms Penny Johnston, MDEQ ✓
Mr. Charles Webb, Hancock Bank

FILE COPY

FAX

to - Penny Johnston

fax number - 1-601-961-5300

phone number -

from - Louis W. Fortenberry

fax number - (228) 769-1219

phone number - (228) 769-6983

number of pages - 1

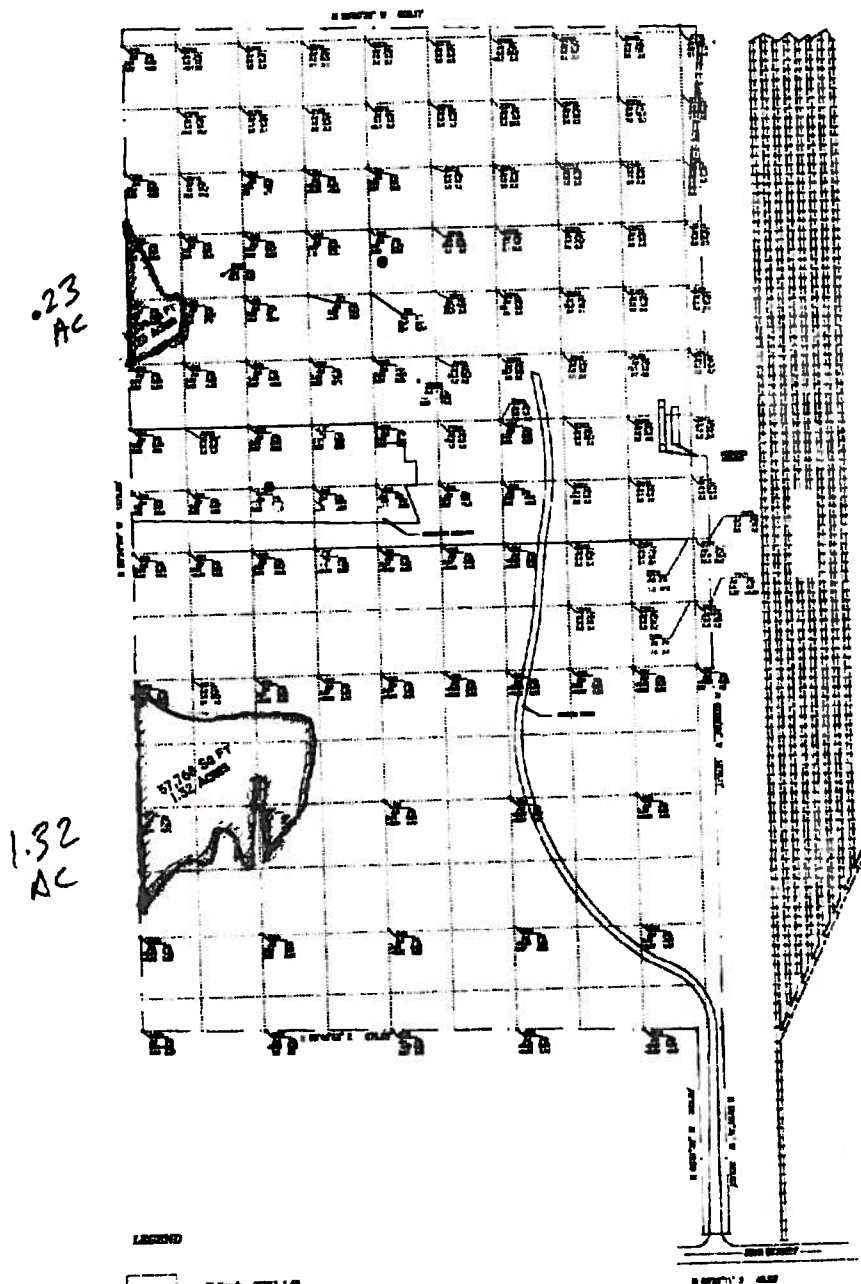
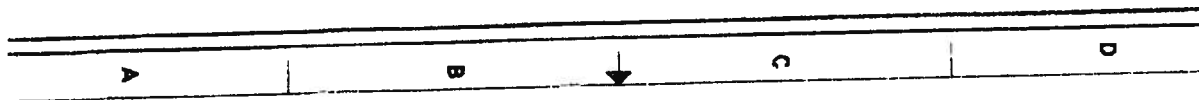
date - 2/22/00

Gulfport Fertilizer



Penny,
I high lighted the two areas of wetlands for your information. I
will wait to hear back before I mail the request to the Corp for a
NW permit which is already authorized.

Louis Fortenberry



LEGEND



Subdiv. 1952 L.S.



Easement - Established July 20 - 21, 1952



Right of Way - Established Aug. 20 - Dec. 2, 1952



Property Boundary - Established by Deed



Survey Boundary



Survey Boundary - Established by Deed

Survey Boundary - Established by Deed

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 8594
MDEQ MDEQ

No. 201004

Invoice
3746989

Reference

Inv Date
02/09/00

Amount Paid
2,550.00

Check Date = 02/08/00

Check Total = 2,550.00

Gulfport Fertilizer

FILE COPY

No. 201004

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

HANCOCK BANK \$2,550dols00cts

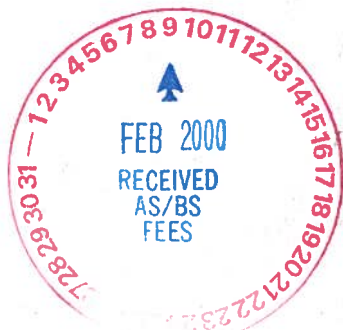
DATE
02/08/00

AMOUNT
****2,550.00

PAY TO THE ORDER OF:
MDEQ
P.O. BOX 20325
JACKSON MS 39289

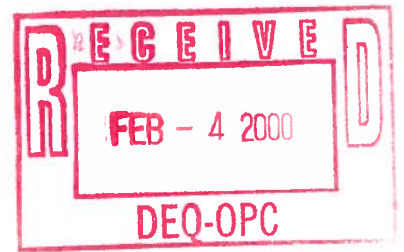
⑈0201004⑈ ⑆065503681⑆ 01 0129100⑈

George A. Fehrsel





DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, ALABAMA 36628-0001



REPLY TO
ATTENTION OF:

January 31, 2000

FILE COPY

Regulatory Branch
Operations Division

SUBJECT: Wetland Determination for 33-Acre Parcel of
Property Adjacent to 33rd Avenue, Gulfport, Mississippi -
Jurisdictional Number MSJ00-00128-T

Butler Services
Attention: Mr. Louis Fortenberry
Post Office Box 1164
Pascagoula, Mississippi 39568-1164

Dear Mr. Fortenberry:

Reference is made to Mississippi Department of Environmental Quality's (MSDEQ) request for a jurisdictional determination concerning the proposed development of a 33-acre parcel of property (old 'razed' fertilizer plant facility) adjacent to 33rd Avenue, Gulfport, Mississippi (see enclosed copy of letter). Specifically, the ('hazardous waste') property is located in Section 33, Township 7 South, Range 11 West, Harrison County, Mississippi. Further reference is made to the on-site meeting of January 26, 2000, between you and Mr. Frank Hubiak, a member of my staff, concerning the property.

The inspection disclosed that a portion of the property is considered 'previously disturbed' wetlands and is subject to our Federal permitting authority pursuant to Section 404 of the Clean Water Act of 1977 (33 USC 1344). Section 404 prohibits the placement of dredged or fill material into waters of the United States, including wetlands, unless the work has been authorized by a Department of the Army permit.

It appears that Federally-regulated wetlands comprise less than 0.33 acres of the property located in the northwestern portion of the property adjacent to the west property line. This 'preliminary' determination was based upon available soils data, aerial photographs, and a reconnaissance field inspection. The exact extent of wetlands on the property cannot be determined without an extensive field investigation which is not warranted at this time. Once specific fill locations for the property have been determined and a project plan developed, it is recommended that a wetland consultant be obtained to determine the actual amount of wetland acreage impacted.

Slab-on-grade construction, grading, landclearing with heavy equipment, some pile-supported structures, and constructing a built-up road are considered filling activities and will require a permit if located in wetlands. Handclearing, bushhogging and burning of vegetation (no fill) does not require a Section 404 permit.

This letter grants no property rights and does not obviate any obligation or responsibility for the compliance with the provisions of any other law or regulation of any local, State (MSDEQ), or Federal authority.

Please be advised that this jurisdictional determination reflects current policy and is based upon criteria contained in the U.S. Army Corps of Engineers' Wetlands Delineation Manual dated January 1987. If after a 5-year period this jurisdictional determination has not been specifically revalidated by the U.S. Army Corps of Engineers, it shall automatically expire.

Thank you for your cooperation with our permit program. If you have any questions concerning this matter, please contact Mr. Frank Hubiak of the Enforcement Section at (334) 690-3186.

Sincerely,

Ronald A. Krizman
Chief, Regulatory Branch
Operations Division

Enclosure

FAX

to - Penny Johnston

fax number - 1-601-961-5300

phone number -

FILE COPY

from - Louis W. Fortenberry

fax number - (228) 769-1219

phone number - (228) 769-6983

number of pages - 1

date - 2/3/00

Gulfport Fertilizer



Penny,
This is the letter we discussed.

Louis



DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, ALABAMA 36628-0001

REPLY TO
ATTENTION OF

January 31, 2000

Regulatory Branch
Operations Division

SUBJECT: Wetland Determination for 33-Acre Parcel of
Property Adjacent to 33rd Avenue, Gulfport, Mississippi -
Jurisdictional Number MSJ00-00128-T

Butler Services
Attention: Mr. Louis Fortenberry
Post Office Box 1164
Pascagoula, Mississippi 39568-1164

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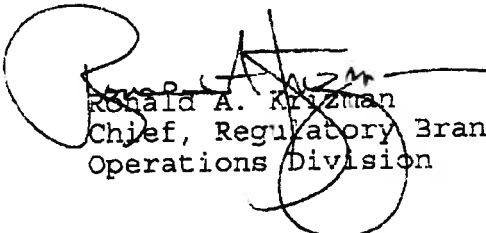
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Thank you for your cooperation with our permit program. If you have any questions concerning this matter, please contact Mr. Frank Hubiak of the Enforcement Section at (334) 690-3186.

Sincerely,


Ronald A. Krizman
Chief, Regulatory Branch
Operations Division

Enclosure



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

MSJ00-00128-T

January 14, 2000

Hamilton Co
now
updated

Frank

U. S. Army Corps of Engineers - Mobile District
Attn: Mr. Ronald A. Krizman, Chief
Regulatory Branch (OP-SA)
Post Office Box 2288
Mobile, Alabama 36628-0001

Dear Mr. Krizman:

The Mississippi Department of Environmental Quality (MDEQ) requests that a wetland delineation be performed on property (see attached map) located on 33rd Street approximately one block west of its intersection with State Highway 49 in Gulfport, Mississippi. MDEQ also requests guidance on any permits that will be required in the event of required remediation in the wetland area(s). The project officer, Penny Johnston, and the consultant, Butler Services, would like to be on site during your visit. You may contact Ms. Johnston at (601) 961-5388 and Mr. Louis Fortenberry of Butler Services at (228) 769-6984 to arrange a date and time.

228-769-6984

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Section

Enclosure

Gulfport Fertilizer - US Army Corps of Engineers - Mobile District.wpd

Post-It® Fax Note	7871	Date	1/14/00	# of pages	2
To	Ronald A. Krizman	From	Penny Johnston		
Co./Dept.	Mobile District	Co.	MDEQ		
Phone	228-694-3787	Phone	601-961-5388		
Fax	228-690-2660	Fax	601-961-5300		

JAN 14 2000

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

January 28, 2000

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

FILE COPY

Invoice 3746989

34 Staff hours @ \$75.00/Hr. for 12/99	\$2,550.00
--	------------

Total Amount Due	<u>\$2,550.00</u>
-------------------------	--------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$2,550.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MDEQ

MDEQ

Invoice
3746988

Reference

No. 199605

Inv Date
01/15/00

Amount Paid
225.00

Check Date = 01/20/00

Check Total = 225.00

FILE COPY

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 199605

HANCOCK BANK \$225dols00cts

DATE

AMOUNT

01/20/00

*****225.00

PAY
TO THE
ORDER
OF:

MDEQ

P.O. BOX 20325

JACKSON MS 39289

⑈0199605⑈ ⑈06550368⑈ 01 0129100⑈





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

January 14, 2000

U. S. Army Corps of Engineers - Mobile District
Attn: Mr. Ronald A. Krizman, Chief
Regulatory Branch (OP-SA)
Post Office Box 2288
Mobile, Alabama 36628-0001

FILE COPY

Dear Mr. Krizman:

The Mississippi Department of Environmental Quality (MDEQ) requests that a wetland delineation be performed on property (see attached map) located on 33rd Street approximately one block west of its intersection with State Highway 49 in Gulfport, Mississippi. MDEQ also requests guidance on any permits that will be required in the event of required remediation in the wetland area(s). The project officer, Penny Johnston, and the consultant, Butler Services, would like to be on site during your visit. You may contact Ms. Johnston at (601) 961-5388 and Mr. Louis Fortenberry of Butler Services at (228) 769-6984 to arrange a date and time.

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Section

Enclosure

Gulfport Fertilizer - US Army Corps of Engineers - Mobile District.wpd

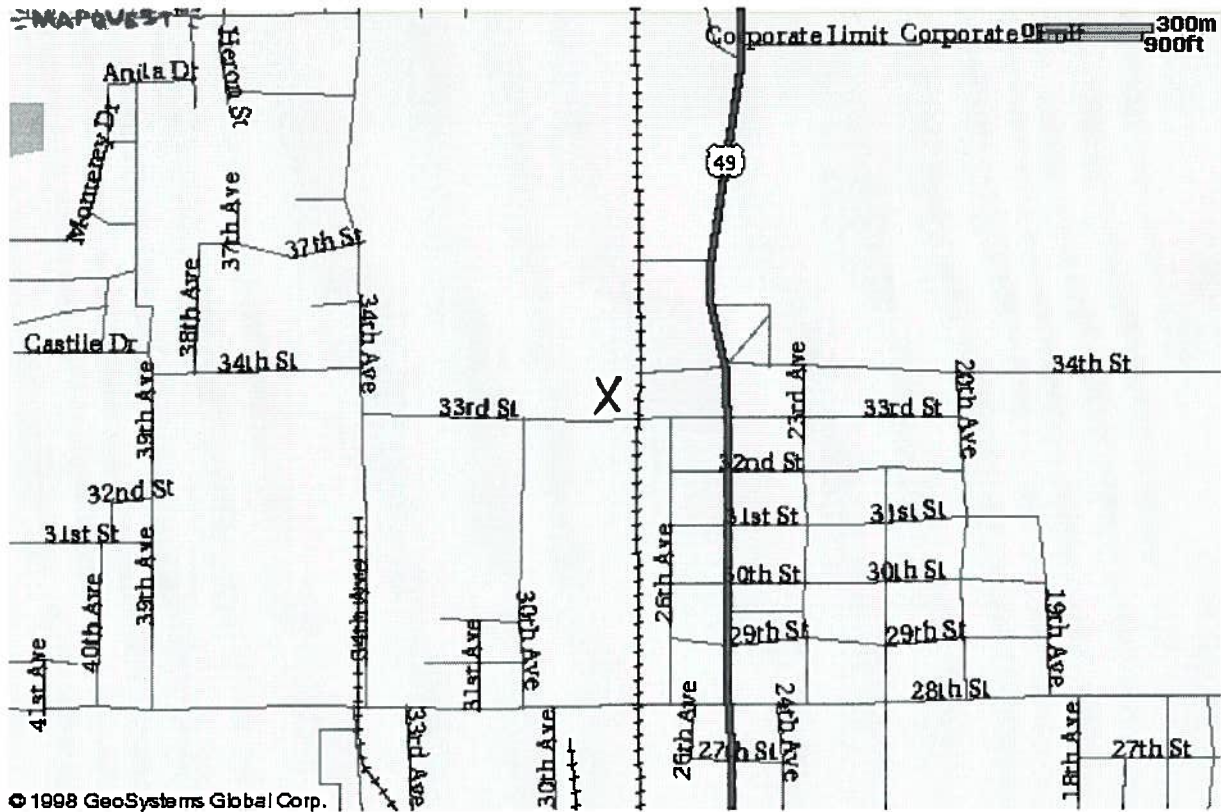
Post-it® Fax Note 7671		Date 1/14/00	# of pages 2
To Ronald A. Krizman	From Penny Johnston		
Co./Dept. Mobile District US Army Corps of Eng.	Co. MDEQ		
Phone # 334-694-3787	Phone # 601-961-5388		
Fax # 334-690-2660	Fax # 601-961-5300		

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612



United States Gulfport, MS



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 Copyright © 1995-2000 Excite Inc., © 1996-1998 MapQuest All rights reserved. [Disclaimer](#) and [Privacy Statement](#)

X = property location

FILE COPY

**** Transmit Conf. Report ****

Jan 14 '00 17:17

MDEQ SUPERFUND BRANCH ---> 79013346902660-/0889	
No.	003
Mode	NORMAL
Pages	2 Page(s)
Result	OK



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

December 30, 1999

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 3746988

3 Staff hours @ \$75.00/Hr. for 11/99	\$225.00
Total Amount Due	<u>\$225.00</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$225.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

FILE COPY

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MDEQ

MDEQ

Invoice
3746987

Reference

Inv Date
11/10/99

No. 1965

Amount Paid
75.00

Check Date = 11/12/99

Check Total = 75.00

FILE COPY



HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 196564

HANCOCK BANK \$75dols00cts

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE

11/12/99

AMOUNT

*****75.00

⑈0196564⑈ ⑈06550368⑈ 01 0129100⑈

George A. Schlegel

No. 193062

MDEQ

MDEQ

Invoice
3746985

Reference

Inv Date
09/13/99

Amount Paid
4,403.50

Check Date = 09/14/99

Check Total = 4,403.50

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 193062

HANCOCK BANK \$4,403dols50cts

FILE COPY

DATE

AMOUNT

09/14/99

****4,403.50

PAY
TO THE
ORDER
OF:

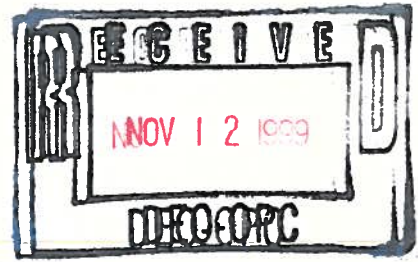
MDEQ
P.O. BOX 23025
JACKSON MS 39289

⑈0193062⑈ ⑆06550368⑆ 01 0129100⑈

George A. Schlegel



Butler Services of Mississippi, Inc.
- Environmental Consulting Services -



November 10, 1999

Ms. Penelope A. Johnston, Project Officer
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

FILE COPY

RE: Former Gulfport Fertilizer Plant, Gulfport, Mississippi
Site Characterization Report dated October 25, 1999

Dear Penny:

We are transmitting herewith two copies each of revised Figures 2 through 7 attached to the Site Characterization Report submitted to your office in connection with the above referenced site. As I indicated in our previous telephone conversation, the iso-concentrations for each of the constituents have been revised and corrected on the enclosed figures.

If you should have any questions or require any additional information, please contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely,

BUTLER SERVICES OF MISSISSIPPI, INC.

William D. Bates, P.E.
Project Manager

WDB:ib

cc: Mr. Charles A. Webb, Executive Vice President, The Hancock Bank w/attachments



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

October 29, 1999

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 3746987

1 Staff hour @ \$75.00/Hr. for 09/99	\$75.00
Total Amount Due	<u>\$75.00</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$75.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MS DEPT ENV

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL

No. 194703

Invoice
1746985
1746986

Reference

Inv Date
10/10/99
10/10/99

Amount Paid
4,403.50
412.50

Check Date = 10/14/99

Check Total = 4,816.00

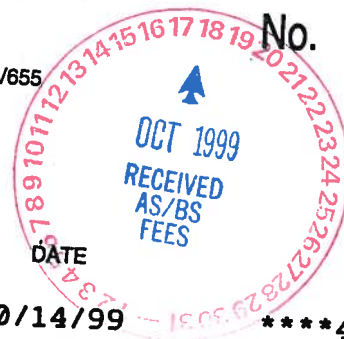
HANCOCK BANK

POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

HANCOCK BANK \$4,816dols00cts

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY
OAS, ATTN: FEE SECTION
P.O. BOX 20325
JACKSON, MS 39289-1325

85-368/655



No. 194703

10/14/99

AMOUNT

****4,816.00

FILE COPY

⑈0194703⑈ ⑈06550368⑈ 01 0129100⑈

George A. Schlegel



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

September 30, 1999

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 3746986

5.5 Staff hours @ \$75.00/Hr. for 08/99	\$412.50
---	----------

Current Amount Due	<u>\$412.50</u>
---------------------------	------------------------

Past due: Invoice #3746985 dated 08/31/99 4,403.50

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$4,816.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

September 16, 1999

FILE COPY

RECEIVED
SEP 20 1999
Dept. of Environmental Quality
Office of Pollution Control

Ms. Penelope A. Johnston, Project Officer
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

RE: Former Gulfport Fertilizer Plant, Gulfport, Mississippi

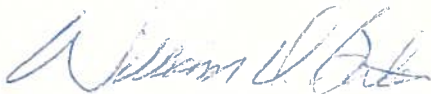
Dear Penny:

This letter is to confirm our conversation via telephone today regarding our request for an extension of time for submittal of the report on the subsurface investigation of the remainder of the above referenced site and your verbal approval of the extension. Pursuant to our conversation, we will submit the assessment report on or before October 25, 1999.

Thank you for your consideration in this matter. If you should have any questions or require any additional information, please contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely,

BUTLER SERVICES OF MISSISSIPPI, INC.



William D. Bates, P.E.
Project Manager

WDB:ib

cc: Mr. Charles Webb, Executive Vice President, The Hancock Bank w/attachments



MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY

OFFICE OF POLLUTION CONTROL
HAZARDOUS WASTE DIVISION
SUPERFUND BRANCH

fax

FILE COPY

To: *Denton Babes*
Company: *Butler Services*

Fax Number: *228-769-1219*

Business Phone: *228-769-6983*

From: *Penny Johnston*

Fax Number: *601-961-5300 or 601-961-5741*

Business Phone: *601-961-5388*

Pages: *4*

Date/Time: *9/13/99 2:40*, including cover page

Subject: *Shapiro - Wilk W Test Tables*

CDT

Table A6 Coefficients a_i for the Shapiro-Wilk W Test for Normality

n	2	3	4	5	6	7	8	9	10
1	0.7071	0.7071	0.6872	0.6646	0.6431	0.6233	0.6052	0.5888	0.5739
2	-	0.0000	0.1677	0.2413	0.2806	0.3031	0.3164	0.3244	0.3291
3	-	-	-	0.0000	0.0875	0.1401	0.1743	0.1976	0.2141
4	-	-	-	-	-	0.0000	0.0561	0.0947	0.1224
5	-	-	-	-	-	-	-	0.0000	0.0399

n	11	12	13	14	15	16	17	18	19	20
1	0.5601	0.5475	0.5359	0.5251	0.5150	0.5056	0.4968	0.4886	0.4808	0.4734
2	0.3315	0.3325	0.3325	0.3318	0.3306	0.3290	0.3273	0.3253	0.3232	0.3211
3	0.2260	0.2347	0.2412	0.2460	0.2495	0.2521	0.2540	0.2553	0.2561	0.2565
4	0.1429	0.1586	0.1707	0.1802	0.1878	0.1939	0.1988	0.2027	0.2059	0.2085
5	0.0695	0.0922	0.1099	0.1240	0.1353	0.1447	0.1524	0.1587	0.1641	0.1686
6	0.0000	0.0303	0.0539	0.0727	0.0880	0.1005	0.1109	0.1197	0.1271	0.1334
7	-	-	0.0000	0.0240	0.0433	0.0593	0.0725	0.0837	0.0932	0.1013
8	-	-	-	-	0.0000	0.0196	0.0359	0.0496	0.0612	0.0711
9	-	-	-	-	-	-	0.0000	0.0163	0.0303	0.0422
10	-	-	-	-	-	-	-	-	0.0000	0.0140

n	21	22	23	24	25	26	27	28	29	30
1	0.4643	0.4590	0.4542	0.4493	0.4450	0.4407	0.4366	0.4328	0.4291	0.4254
2	0.3185	0.3156	0.3126	0.3098	0.3069	0.3043	0.3018	0.2992	0.2968	0.2944
3	0.2578	0.2571	0.2563	0.2554	0.2543	0.2533	0.2522	0.2510	0.2499	0.2487
4	0.2119	0.2131	0.2139	0.2145	0.2148	0.2151	0.2152	0.2151	0.2150	0.2148
5	0.1736	0.1764	0.1787	0.1807	0.1822	0.1836	0.1848	0.1857	0.1864	0.1870
6	0.1399	0.1443	0.1480	0.1512	0.1539	0.1563	0.1584	0.1601	0.1616	0.1630
7	0.1092	0.1150	0.1201	0.1245	0.1283	0.1316	0.1346	0.1372	0.1395	0.1415
8	0.0804	0.0878	0.0941	0.0997	0.1046	0.1089	0.1128	0.1162	0.1192	0.1219
9	0.0530	0.0618	0.0696	0.0764	0.0823	0.0876	0.0923	0.0965	0.1002	0.1036
10	0.0263	0.0368	0.0459	0.0539	0.0610	0.0672	0.0728	0.0778	0.0822	0.0862
11	0.0000	0.0122	0.0228	0.0321	0.0403	0.0476	0.0540	0.0598	0.0650	0.0697
12	-	-	0.0000	0.0107	0.0200	0.0284	0.0358	0.0424	0.0483	0.0537
13	-	-	-	-	0.0000	0.0094	0.0178	0.0253	0.0320	0.0381
14	-	-	-	-	-	-	0.0000	0.0084	0.0159	0.0227
15	-	-	-	-	-	-	-	-	0.0000	0.0076

Source: From Shapiro and Wilk, 1965. Used by permission.

This table is used in Section 12.3.1.

Table A6 (continued)

$f \backslash n$	31	32	33	34	35	36	37	38	39	40
1	0.4220	0.4188	0.4156	0.4127	0.4096	0.4068	0.4040	0.4015	0.3989	0.3964
2	0.2921	0.2898	0.2876	0.2854	0.2834	0.2813	0.2794	0.2774	0.2755	0.2737
3	0.2475	0.2462	0.2451	0.2439	0.2427	0.2415	0.2403	0.2391	0.2380	0.2368
4	0.2145	0.2141	0.2137	0.2132	0.2127	0.2121	0.2116	0.2110	0.2104	0.2098
5	0.1874	0.1878	0.1880	0.1882	0.1883	0.1883	0.1883	0.1881	0.1880	0.1878
6	0.1641	0.1651	0.1660	0.1667	0.1673	0.1678	0.1683	0.1686	0.1689	0.1691
7	0.1433	0.1449	0.1463	0.1475	0.1487	0.1496	0.1505	0.1513	0.1520	0.1526
8	0.1243	0.1265	0.1284	0.1301	0.1317	0.1331	0.1344	0.1356	0.1366	0.1376
9	0.1066	0.1093	0.1116	0.1140	0.1160	0.1179	0.1196	0.1211	0.1225	0.1237
10	0.0899	0.0931	0.0961	0.0988	0.1013	0.1036	0.1056	0.1075	0.1092	0.1108
11	0.0739	0.0777	0.0812	0.0844	0.0873	0.0900	0.0924	0.0947	0.0967	0.0986
12	0.0585	0.0629	0.0669	0.0706	0.0739	0.0770	0.0798	0.0824	0.0848	0.0870
13	0.0435	0.0485	0.0530	0.0572	0.0610	0.0645	0.0677	0.0706	0.0733	0.0759
14	0.0289	0.0344	0.0395	0.0441	0.0484	0.0523	0.0559	0.0592	0.0622	0.0651
15	0.0144	0.0206	0.0262	0.0314	0.0361	0.0404	0.0444	0.0481	0.0515	0.0546
16	0.0000	0.0068	0.0131	0.0187	0.0239	0.0287	0.0331	0.0372	0.0409	0.0444
17	-	-	0.0000	0.0062	0.0119	0.0172	0.0220	0.0264	0.0305	0.0343
18	-	-	-	-	0.0000	0.0057	0.0110	0.0158	0.0203	0.0244
19	-	-	-	-	-	-	0.0000	0.0053	0.0101	0.0146
20	-	-	-	-	-	-	-	-	0.0000	0.0049

$f \backslash n$	41	42	43	44	45	46	47	48	49	50
1	0.3940	0.3917	0.3894	0.3872	0.3850	0.3830	0.3808	0.3789	0.3770	0.3751
2	0.2719	0.2701	0.2684	0.2667	0.2651	0.2635	0.2620	0.2604	0.2589	0.2574
3	0.2357	0.2345	0.2334	0.2323	0.2313	0.2302	0.2291	0.2281	0.2271	0.2260
4	0.2091	0.2085	0.2078	0.2072	0.2065	0.2058	0.2052	0.2045	0.2038	0.2032
5	0.1876	0.1874	0.1871	0.1868	0.1865	0.1862	0.1859	0.1855	0.1851	0.1847
6	0.1693	0.1694	0.1695	0.1695	0.1695	0.1695	0.1695	0.1693	0.1692	0.1691
7	0.1531	0.1535	0.1539	0.1542	0.1545	0.1548	0.1550	0.1551	0.1553	0.1554
8	0.1384	0.1392	0.1398	0.1405	0.1410	0.1415	0.1420	0.1423	0.1427	0.1430
9	0.1249	0.1259	0.1269	0.1278	0.1286	0.1293	0.1300	0.1306	0.1312	0.1317
10	0.1123	0.1136	0.1149	0.1160	0.1170	0.1180	0.1189	0.1197	0.1205	0.1212
11	0.1004	0.1020	0.1035	0.1049	0.1062	0.1073	0.1085	0.1095	0.1105	0.1113
12	0.0891	0.0909	0.0927	0.0943	0.0959	0.0972	0.0986	0.0998	0.1010	0.1020
13	0.0782	0.0804	0.0824	0.0842	0.0860	0.0876	0.0892	0.0906	0.0919	0.0932
14	0.0677	0.0701	0.0724	0.0745	0.0765	0.0783	0.0801	0.0817	0.0832	0.0846
15	0.0575	0.0602	0.0628	0.0651	0.0673	0.0694	0.0713	0.0731	0.0748	0.0764
16	0.0476	0.0506	0.0534	0.0560	0.0584	0.0607	0.0628	0.0648	0.0667	0.0685
17	0.0379	0.0411	0.0442	0.0471	0.0497	0.0522	0.0546	0.0568	0.0588	0.0608
18	0.0283	0.0318	0.0352	0.0383	0.0412	0.0439	0.0465	0.0489	0.0511	0.0532
19	0.0188	0.0227	0.0263	0.0296	0.0328	0.0357	0.0385	0.0411	0.0436	0.0459
20	0.0094	0.0136	0.0175	0.0211	0.0245	0.0277	0.0307	0.0335	0.0361	0.0386
21	0.0000	0.0045	0.0087	0.0126	0.0163	0.0197	0.0229	0.0259	0.0288	0.0314
22	-	-	0.0000	0.0042	0.0081	0.0118	0.0153	0.0185	0.0215	0.0244
23	-	-	-	-	0.0000	0.0039	0.0076	0.0111	0.0143	0.0174
24	-	-	-	-	-	-	0.0000	0.0037	0.0071	0.0104
25	-	-	-	-	-	-	-	-	0.0000	0.0035

Table A

Source:
The null
 W_{α}
This tab

Table A7 Quantiles of the Shapiro-Wilk W Test for Normality (Values of W Such That 100p% of the Distribution of W Is Less Than W_p)

n	$W_{0.01}$	$W_{0.02}$	$W_{0.05}$	$W_{0.10}$	$W_{0.50}$
3	0.753	0.756	0.767	0.789	0.959
4	0.687	0.707	0.748	0.792	0.935
5	0.686	0.715	0.762	0.806	0.927
6	0.713	0.743	0.788	0.826	0.927
7	0.730	0.760	0.803	0.838	0.928
8	0.749	0.778	0.818	0.851	0.932
9	0.764	0.791	0.829	0.859	0.935
10	0.781	0.806	0.842	0.869	0.938
11	0.792	0.817	0.850	0.876	0.940
12	0.805	0.828	0.859	0.883	0.943
13	0.814	0.837	0.866	0.889	0.945
14	0.825	0.846	0.874	0.895	0.947
15	0.835	0.855	0.881	0.901	0.950
16	0.844	0.863	0.887	0.906	0.952
17	0.851	0.869	0.892	0.910	0.954
18	0.858	0.874	0.897	0.914	0.956
19	0.863	0.879	0.901	0.917	0.957
20	0.868	0.884	0.905	0.920	0.959
21	0.873	0.888	0.908	0.923	0.960
22	0.878	0.892	0.911	0.926	0.961
23	0.881	0.895	0.914	0.928	0.962
24	0.884	0.898	0.916	0.930	0.963
25	0.886	0.901	0.918	0.931	0.964
26	0.891	0.904	0.920	0.933	0.965
27	0.894	0.906	0.923	0.935	0.965
28	0.896	0.908	0.924	0.936	0.966
29	0.898	0.910	0.926	0.937	0.966
30	0.900	0.912	0.927	0.939	0.967
31	0.902	0.914	0.929	0.940	0.967
32	0.904	0.915	0.930	0.941	0.968
33	0.906	0.917	0.931	0.942	0.968
34	0.908	0.919	0.933	0.943	0.969
35	0.910	0.920	0.934	0.944	0.969
36	0.912	0.922	0.935	0.945	0.970
37	0.914	0.924	0.936	0.946	0.970
38	0.916	0.925	0.938	0.947	0.971
39	0.917	0.927	0.939	0.948	0.971
40	0.919	0.928	0.940	0.949	0.972
41	0.920	0.929	0.941	0.950	0.972
42	0.922	0.930	0.942	0.951	0.972
43	0.923	0.932	0.943	0.951	0.973
44	0.924	0.933	0.944	0.952	0.973
45	0.926	0.934	0.945	0.953	0.973
46	0.927	0.935	0.945	0.953	0.974
47	0.928	0.936	0.946	0.954	0.974
48	0.929	0.937	0.947	0.954	0.974
49	0.929	0.937	0.947	0.955	0.974
50	0.930	0.938	0.947	0.955	0.974

Source: After Shapiro and Wilk, 1965.

The null hypothesis of a normal distribution is rejected at the α significance level if the calculated W is less than W_α .

This table is used in Section 12.3.1.

** Transmit Conf. Report **

Sep 13 '99 14:42

MDEQ SUPERFUND BRANCH ---> 79012287691219-/0889	
No.	001
Mode	NORMAL
Pages	4 Page(s)
Result	O K



ButlerMS@aol.com on 09/08/99 04:40:29 PM

To: Penelope Johnston/HW/OPC/DEQ@DEQ
cc:
Subject: Table

Penny,
We have exhausted places to find the table to calculate the background statistically for lead and arsenic for the Gulfport Fertilizer site. we would appreciate your e-mailing us the table, fax it or snail mail it which ever is the best for you. Thanks for your help.

Louis Fortenberry

FILE COPY



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

August 31, 1999

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 3746985

44.5 Staff hour @ \$75.00/Hr. for 07/99	\$3,337.50
Plus: Analytical Samples dated 08/02/99	\$583.00
Plus: Analytical Samples dated 08/23/99	\$483.00
Total Amount Due	<u>\$4,403.50</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$4,403.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

Invoice

Invoice Number:
Date: August 2, 1999

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 1935 - 1939	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1935	40.00	40.00
4	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1936 - 1939	30.00	120.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1935	23.00	23.00
4	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1936 - 1939	17.00	68.00
1	TCLP SAMPLE ANALYZED FOR ARSENIC AND LEAD, Gulfport Fertilizer Sample Number 1937	113.00	113.00
2	TCLP SAMPLES ANALYZED FOR ARSENIC AND LEAD, Gulfport Fertilizer Sample Numbers 1938 - 1939	97.00	194.00
SUBTOTAL			583.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$583.00

Invoice

Invoice Number:
Date: August 23, 1999

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 1982 - 1987	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1982	40.00	40.00
5	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1983 - 1987	30.00	150.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1982	23.00	23.00
5	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 1983 - 1987	17.00	85.00
1	UNFILTERED ARSENIC AND LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 1980	80.00	80.00
1	FILTERED ARSENIC AND LEAD SAMPLE + FILTER ANALYZED, Gulfport Fertilizer Sample Numbers 1981, 1988	80.00	80.00
SUBTOTAL			483.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$483.00



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PJ*
DATE: August 26, 1999
SUBJECT: Phone Conversation

On the above referenced date I spoke with Mr. Denton Bates of Butler Services regarding the recommended samples for TCLP samples as outlined in the Soil Sampling Analytical Results for the Gulfport Fertilizer Site Letter dated August 20, 1999. I told Mr. Bates that the selected samples were fine and to have the lab go ahead and run the analyses.

C:\MyFiles\Gulfport Fertilizer\Gulfport Fertilizer Phone Conversation Memo 8-26-99 (pj).wpd

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289-0385 Phone 601.961.5171 Fax 601.354.6612

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

August 23, 1999

FILE COPY

RECEIVED
AUG 25 1999
Dept. of Environmental Quality
Office of Pollution Control

Ms. Penelope A. Johnston, Project Officer
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

RE: Soil Sampling Analytical Results - Former Gulfport Fertilizer Plant
Located on 33rd Street in Gulfport, Mississippi

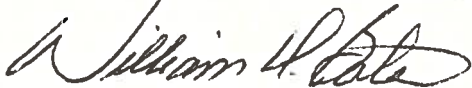
Dear Penny:

We are transmitting herewith three corrected laboratory data sheets in connection with the above referenced project. The corrections are minor and have been highlighted in yellow for your reference.

If you should have any questions or require any additional information, please contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely,

BUTLER SERVICES OF MISSISSIPPI, INC.



William D. Bates, P.E.
Project Manager

WDB:ib

Attachments: Laboratory Data Sheets - Lab File #227-BS-07-99

cc: Mr. Charles Webb, Executive Vice President, The Hancock Bank w/attachments

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

<u>SAMPLE DESCRIPTION</u>	<u>MM#</u>	<u>ARSENIC</u> <u>mg/kg</u>	<u>LEAD</u> <u>mg/kg</u>
S40-2' DUPLICATE	75923	1.60	3.52
S40-4' DUPLICATE	75924	3.57	<0.2
S57-2'	75925	1.05	<0.2
S57-4'	75926	<0.05	7.89
S58-2'	75927	3.09	32.1
Duplicate		3.41	29.2
S58-4'	75928	0.65	2.79
S59-2'	75929	0.40	6.90
S59-4'	75930	<0.05	1.72
S60-2'	75931	0.84	5.74
S60-4'	75932	0.42	7.25
Duplicate		0.26	1.97
S36-2'	75933	0.98	7.83
S36-4'	75934	1.52	1.41
S38-2'	75935	0.50	2.34
S38-4'	75936	0.31	2.09
T9100W-2'	75937	0.52	32.7
Duplicate		0.50	10.75
T9100W-4'	75938	1.74	3.56
S50-2'	75939	702	597
S50-4'	75940	113	12.6

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic
SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
S40-2'	75941	1.27	2.38
S-40-4'	75942	3.50	492
Duplicate		4.54	287
S126-2'	75943	0.40	6.23
S126-4'	75944	0.24	1.97
S98-2'	75945	0.11	<0.20
S98-4'	75946	0.06	0.57
S77-2'	75947	0.07	1.95
Duplicate		<0.05	1.79
S77-4'	75948	<0.05	1.11
S96-2'	75949	0.19	0.58
S96-4'	75950	<0.05	0.65
S94-2'	75951	<0.05	1.99
S94-4'	75952	<0.05	1.07
Duplicate		<0.05	0.05
N40-2'	75953	0.11	0.79
N40-4'	75954	0.05	1.50
S49-2'	75955	1.19	4.47
S49-4'	75956	0.32	4.51
S48-2'	75957	0.55	45.0
Duplicate		0.37	28.4

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic
SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
S48-4'	75958	0.58	4.69
S47-2'	75959	0.69	43.0
S47-4'	75960	0.23	2.55
S37-2'	75961	5.34	6.74
S37-4'	75962	1.35	4.59
Duplicate		2.87	1.98
S56-2'	75963	0.44	4.45
S56-4'	75964	<0.05	0.80
S55-2'	75965	0.07	4.02
S55-4'	75966	<0.05	2.25
S55-2' DUPLICATE	75967	0.05	4.58
Duplicate			4.13
S55-4' DUPLICATE	75968	<0.05	2.82
S54-2'	75969	<0.05	2.58
S54-4'	75970	<0.05	3.70
S45-2'	75971	4.24	303
S45-4'	75972	23.6	72.2
Duplicate		17.9	49.0
S1110-2'	75973	<0.05	1.76
S1110-4'	75974	<0.05	2.51

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic
SW 846, 7420-Direct - Lead

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

FILE COPY

August 20, 1999



Ms. Penelope A. Johnston, Project Officer
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

RE: Soil Sampling Analytical Results - Former Gulfport Fertilizer Plant
Located on 33rd Street in Gulfport, Mississippi

Dear Penny:

As you are aware, Butler Services of Mississippi, Inc. (Butler Services) collected soil samples at the above referenced site on July 19 and July 23, 1999 in general accordance with the Work Plan approved by your office. A groundwater sample was also collected from Monitoring Well No. MW-1 during that same period. The samples were then delivered to Micro Methods in Ocean Springs under chain of custody for analyses. We are transmitting herewith a copy of the sampling analytical results and copies of the chain of custody for your review and information. We are also enclosing a tabulation of the soil sampling analytical results, Tables 1-1 and 1-2.

In accordance with our work plan we have selected five of the samples for further analyses by TCLIP. The recommended samples and target compounds in milligrams per kilogram (mg/kg) are as follows:

<u>SAMPLE NO(s).</u>	<u>LAB MM#</u>	<u>Arsenic (As)</u>	<u>Lead (Pb)</u>
RC6 - 2'	75756	691	5982
RC7 - 2'	75769	78.1	5286
S18 - 4'	75776	29.0	3657
S19 - 2'	75777	45.0	1507
S50 - 2'	75939	702	597

If your office is in agreement with the above recommendations we will authorize the laboratory to proceed with the additional leachability analyses.

Ms. Penelope A. Johnston

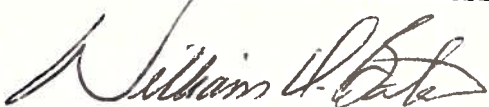
August 20, 1999

Page 2 of 2

If you should have any questions or require any additional information, please contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely,

BUTLER SERVICES OF MISSISSIPPI, INC.



William D. Bates, P.E.
Project Manger

WDB:ib

Attachments: Laboratory Data Sheets and Chain of Custody

cc: Mr. Charles Webb, Executive Vice President, The Hancock Bank w/attachments

TABLE 1-1
REMAINDER OF 33 Acre PARCEL
NORTHERN HALF
SOIL SAMPLING ANALYTICAL RESULTS
 July 19, July 23, 1999
 FORMER GULFPORT FERTILIZER PLANT
 33RD STREET
 GULFPORT, MISSISSIPPI
 Page 1 of 3

Sample Number	Sample Location	Sample Depth 2ft		Sample Depth 4ft		REMARKS
		Arsenic As (mg/kg)	Lead Pb (mg/kg)	Arsenic As (mg/kg)	Lead Pb (mg/kg)	
N40	400 ft North of Radial Conveyor Line	0.11	0.79	0.05	1.50	
N20	200 ft North of Radial Conveyor Line	12.4	98.0	0.39	4.35	
N16	100 ft North of Radial Conveyor Line	0.65	672	0.24	44.6	
N17	100 ft North of Radial Conveyor Line	<0.07	3.45	<0.08	<0.6	
N17		0.27	3.91	-	-	Laboratory Duplicate
N18	100 ft North of Radial Conveyor Line	13.2	298	-	-	
RC6	Radial Conveyor Line	691	5982	0.29	9.50	
RC7	Radial Conveyor Line	78.1	5280	34.9	8.74	
RC8	Radial Conveyor Line	17.4	62.7	1.10	5.25	
RC8		-	-	0.43	4.27	Laboratory Duplicate
RC9	Radial Conveyor Line	145	474	8.11	26.9	
RC10	Radial Conveyor Line	127	348	175	22.8	
RC10		108	-	-	-	Laboratory Duplicate
S16	100 ft South of Radial Conveyor Line	90.4	291	18.4	9.69	
S17	100 ft South of Radial Conveyor Line	0.69	11.6	3.57	11.1	
S17		-	-	1.38	10.1	Laboratory Duplicate
S18	100 ft South of Radial Conveyor Line	6.06	640	29.0	3657	
S19	100 ft South of Radial Conveyor Line	45.0	1507	1.88	378	
S20	100 ft South of Radial Conveyor Line	12.6	5.24	<0.1	2.73	
S20		-	-	<0.1	2.30	Laboratory Duplicate
S26	200 ft South of Radial Conveyor Line	0.28	<0.2	5.25	<0.2	
S26		7.68	<0.2	-	-	Laboratory Duplicate
S27	200 ft South of Radial Conveyor Line	1.64	15.12	1.67	3.08	
S27		-	-	1.87	1.87	Laboratory Duplicate
S28	200 ft South of Radial Conveyor Line	1.23	5.76	1.08	<0.2	
S28		-	-	1.62	4.19	Laboratory Duplicate
S29	200 ft South of Radial Conveyor Line	3.93	2.59	2.49	4.00	

TABLE 1-1
REMAINDER OF 33 Acre PARCEL
NORTHERN HALF
SOIL SAMPLING ANALYTICAL RESULTS
 July 19, July 23, 1999
 FORMER GULFPORT FERTILIZER PLANT
 33RD STREET
 GULFPORT, MISSISSIPPI
 Page 2 of 3

Sample Number	Sample Location	Sample Depth 2ft		Sample Depth 4ft		REMARKS
		Arsenic As (mg/kg)	Lead Pb (mg/kg)	Arsenic As (mg/kg)	Lead Pb (mg/kg)	
S30	200 ft South of Radial Conveyor Line	0.74	4.50	1.24	2.74	Laboratory Duplicate
S30		1.04	4.08	-	-	
S34	300 ft South of Radial Conveyor Line	0.39	0.91	0.18	0.67	
S36	300 ft South of Radial Conveyor Line	0.98	7.83	1.52	1.41	
S37	300 ft South of Radial Conveyor Line	5.34	6.74	1.35	4.59	Laboratory Duplicate
S37		-	-	2.87	1.98	
S38	300 ft South of Radial Conveyor Line	0.50	2.34	0.31	2.09	
S40	300 ft South of Radial Conveyor Line	1.27	2.38	3.50	492	
S40		-	-	4.54	287	Laboratory Duplicate
S40	300 ft South of Radial Conveyor Line	1.60	3.52	3.57	<0.2	Field Duplicate
S44	400 ft South of Radial Conveyor Line	8.08	73.2	0.68	<0.2	Laboratory Duplicate
S45	400 ft South of Radial Conveyor Line	4.24	303	23.6	72.2	
S45		-	-	17.9	49.0	
S46	400 ft South of Radial Conveyor Line	2.98	183	0.77	3.20	
S46		-	-	0.05	2.26	Laboratory Duplicate
S47	400 ft South of Radial Conveyor Line	0.69	43.0	0.23	2.55	Laboratory Duplicate
S48	400 ft South of Radial Conveyor Line	0.55	45.0	0.58	4.69	
S48		037	28.4	-	-	
S49	400 ft South of Radial Conveyor Line	1.19	4.47	0.32	4.51	
S50	400 ft South of Radial Conveyor Line	702	597	113	12.6	Field Duplicate
S54	500 ft South of Radial Conveyor Line	<0.05	2.58	<0.05	3.70	
S55	500 ft South of Radial Conveyor Line	0.07	4.02	<0.05	2.25	
S55	500ft South of Radial Conveyor Line	0.05	4.58	<0.05	2.82	
S55		-	4.13	-	-	Laboratory Duplicate
S56	500 ft South of Radial Conveyor Line	0.44	4.45	<0.05	0.80	Laboratory Duplicate
S57	500 ft South of Radial Conveyor Line	1.05	<0.2	<0.05	7.89	
S58	500 ft South of Radial Conveyor Line	3.09	32.1	0.65	2.79	
S58		3.41	29.2	-	-	
S59	500 ft South of Radial Conveyor Line	0.40	6.90	<0.05	1.72	

**Butler Services of
Mississippi, Inc.**

TABLE 1-1
REMAINDER OF 33 Acre PARCEL
NORTHERN HALF
SOIL SAMPLING ANALYTICAL RESULTS
 July 19, July 23, 1999
 FORMER GULFPORT FERTILIZER PLANT
 33RD STREET
 GULFPORT, MISSISSIPPI
 Page 3 of 3

Sample Number	Sample Location	Sample Depth 2ft		Sample Depth 4ft		REMARKS
		Arsenic As (mg/kg)	Lead Pb (mg/kg)	Arsenic As (mg/kg)	Lead Pb (mg/kg)	
S60	500 ft South of Radial Conveyor Line	0.84	5.74	0.42	7.25	Laboratory Duplicate
S60		-	-	0.26	1.97	
T450N	50 ft North of Test Pit 4	21.3	147			Covington Test Pit
T450S	50 ft South of Test Pit 4	6.99	40.9	4.53	64.4	Covington Test Pit
T450E	50 ft East of Test Pit 4	11.7	1076	0.22	780	Covington Test Pit
T4100E	100 ft East of Test Pit 4	0.69	298	14.3	23.4	Covington Test Pit
T5	Test Pit 5	47.2	28.6	242	28.1	Covington Test Pit
T550N	50 ft North of Test Pit 5	359	226	146	703	Covington Test Pit
T5100E	100 ft East of Test Pit 5	<0.1	293	0.37	3.50	Covington Test Pit
T7100E	100 ft East of Test Pit 7	<0.1	2.86	0.20	11.6	Covington Test Pit
T9100W	100 ft West of Test Pit 9	0.52	32.7	1.74	3.56	Covington Test Pit
T9100W		0.50	10.75	-	-	Laboratory Duplicate

See Appendix for actual laboratory analysis sheets.

Method References:

(1) Arsenic (As), SW 846, 6010A - ICP

(2) Lead (Pb), SW 846, 6010A - ICP

NA : Not Analyzed.

ND : Not detected at a value greater than reporting limit.

< : less than

(mg/kg) : milligrams per kilogram (ppm)

ppm : parts per million

**Butler Services of
Mississippi, Inc.**

TABLE 1-2
REMAINDER OF 33 Acre PARCEL
SOUTHERN HALF
SOIL SAMPLING ANALYTICAL RESULTS
 July 23, 1999
 FORMER GULFPORT FERTILIZER PLANT
 33RD STREET
 GULFPORT, MISSISSIPPI
 Page 1 of 2

Sample Number	Sample Location	Sample Depth 2ft		Sample Depth 4ft		REMARKS
		Arsenic As (mg/kg)	Lead Pb (mg/kg)	Arsenic As (mg/kg)	Lead Pb (mg/kg)	
S71	700 ft South of Radial Conveyor Line	<0.05	0.98	-	-	Laboratory Duplicate
S71		<0.05	3.30	-	-	
S72	700 ft South of Radial Conveyor Line	<0.05	63.4	<0.05	8.34	Laboratory Duplicate
S72	" " " " "	0.14	69.4	-	-	
S73	700 ft South of Radial Conveyor Line	0.20	0.72	<0.05	0.25	Field Duplicate
S74	700 ft South of Radial Conveyor Line	<0.05	0.78	<0.05	0.60	
S75	700 ft South of Radial Conveyor Line	<0.05	2.00	<0.05	2.92	Laboratory Duplicate
S75		<0.05	0.83	<0.05	3.17	
S76	700 ft South of Radial Conveyor Line	0.60	1.80	<0.05	0.95	Laboratory Duplicate
S76		-	-	<0.05	1.52	
S77	700 ft South of Radial Conveyor Line	0.07	1.95	<0.05	1.11	Laboratory Duplicate
S77		<0.05	1.79	-	-	
S78	700 ft South of Radial Conveyor Line	0.21	4.05	<0.05	2.94	Laboratory Duplicate
S78		-	2.28	-	-	
S80	700 ft South of Radial Conveyor Line	<0.05	2.82	1.02	3.92	Laboratory Duplicate
S92	900 ft South of Radial Conveyor Line	0.39	3.61	<0.05	1.28	
S94	900 ft South of Radial Conveyor Line	<0.05	1.99	<0.05	1.07	Laboratory Duplicate
S94		-	-	<0.05	0.05	
S96	900 ft South of Radial Conveyor Line	0.19	0.58	<0.05	0.65	Field Duplicate
S98	900 ft South of Radial Conveyor Line	0.11	<0.20	0.08	0.57	
S98		<0.05	4.29	-	-	Laboratory Duplicate
S910	900 ft South of Radial Conveyor Line	0.28	2.95	<0.05	0.56	
S910		0.31	4.66	-	-	Field Duplicate
S112	1100 ft South Radial Conveyor Line	0.10	2.01	<0.05	1.07	
S112		<0.05	2.35	-	-	Laboratory Duplicate
S114	1100 ft South Radial Conveyor Line	<0.05	1.79	0.07	0.72	
S114		-	-	-	0.70	Laboratory Duplicate
S116		0.62	2.19	<0.05	1.04	

TABLE 1-2
 REMAINDER OF 33 Acre PARCEL
 SOUTHERN HALF
 SOIL SAMPLING ANALYTICAL RESULTS
 July 23, 1999
 FORMER GULFPORT FERTILIZER PLANT
 33RD STREET
 GULFPORT, MISSISSIPPI
 Page 2 of 2

Sample Number	Sample Location	Sample Depth 2ft		Sample Depth 4ft		REMARKS
		Arsenic As (mg/kg)	Lead Pb (mg/kg)	Arsenic As (mg/kg)	Lead Pb (mg/kg)	
S118	1100 ft South Radial Conveyor Line	0.20	13.1	0.21	5.94	Laboratory Duplicate
S1110	1100 ft South Radial Conveyor Line	<0.05	1.76	<0.05	2.51	
S122	1200 ft South Radial Conveyor Line	<0.05	1.39	<0.05	<0.2	
S122		-	-	<0.05	<0.2	
S124	1200 ft South Radial Conveyor Line	<0.05	0.44	<0.05	1.13	
S126	1200 ft South Radial Conveyor Line	0.40	6.23	0.24	1.97	
S128	1200 ft South Radial Conveyor Line	<0.05	0.32	-	-	
S128		<0.05	2.07	-	-	
S1210	1200 ft South Radial Conveyor Line	0.22	<0.2	0.24	3.87	
						Field Duplicate

See Appendix for actual laboratory analysis sheets.

Method References:

(1) Arsenic (As), SW 846, 6010A - ICP

(2) Lead (Pb), SW 846, 6010A - ICP

NA : Not Analyzed.

ND : Not detected at a value greater than reporting limit.

< : less than

(mg/kg) : milligrams per kilogram (ppm)

ppm : parts per million

**Butler Services of
Mississippi, Inc.**



ANALYTICAL SERVICE COMPANY

18-Aug-99

Butler Services
ATTN: Louis Fortenberry
P O Box 1164
Pascagoula, MS 39567

RE: LF #269-BS-07-99
LF #190-BS-07-99
LF #277-BS-07-99

Dear Mr. Fortenberry:

As per your request concerning the lower limits for the above referenced reports, based on sample size, the lower limits achieved for arsenic in soil is <0.05 mg/kg and lead is <0.2 mg/kg. The lower limits for arsenic and lead in water is <5 µg/l. If further information is needed, please contact the office.

Sincerely,

Harry P. Howell

HPH/tt

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #190-BS-07-99

GULFPORT FERTILIZER COMPANY
7/19/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
N16-2'	75754	0.65	672
N16-4'	75755	0.24	44.6
RC6-2'	75756	691	5982
RC6-4'	75757	0.29	9.50
N17-2'	75758	<0.07	3.45
Duplicate		0.27	3.91
N17-4'	75759	<0.08	<0.6
N18-2'	75760	13.2	298
N20-2'	75761	12.4	98.0
N20-4'	75762	0.39	4.35
RC10-2'	75763	127	348
Duplicate		108	
RC10-4'	75764	175	22.8
RC9-2'	75765	145	474
RC9-4'	75766	8.11	26.9
RC8-2'	75767	17.4	62.7
RC8-4'	75768	1.10	5.25
Duplicate		0.43	4.27
RC7-2'	75769	78.1	5280
RC7-4'	75770	34.9	8.74

METHODOLOGY
SW 846, 6010A - ICP

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #190-BS-07-99

GULFPORT FERTILIZER COMPANY
7/19/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
S16-2'	75771	90.4	291
S16-4'	75772	18.4	9.69
S17-2'	75773	0.69	11.6
S17-4'	75774	3.57	11.1
Duplicate		1.38	10.1
S18-2'	75775	6.06	640
S18-4'	75776	29.0	3657
S19-2'	75777	45.0	1507
S19-4'	75778	1.88	378
S20-2'	75779	12.6	5.24
S20-4'	75780	<.1	2.73
Duplicate		<.1	2.30
T4100E-2'	75781	0.69	298
T4100E-4'	75782	14.3	23.4
T450N-2'	75783	21.3	147
T5-2'	75784	47.2	28.6
T5-4'	75785	242	28.1
T550N-2'	75786	359	226
T550N-4'	75787	146	703

METHODOLOGY
SW 846, 6010A - ICP

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #190-BS-07-99

GULFPORT FERTILIZER COMPANY
7/19/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
T5100E-2'	75788	<.1	293
T5100E-4'	75789	0.37	3.50
T450S-2'	75790	6.99	40.9
T450S-4'	75791	4.53	64.4

METHODOLOGY
SW 846, 6010A - ICP

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #190-BS-07-99

GULFPORT FERTILIZER COMPANY
7/19/99
WATER SAMPLES

<u>SAMPLE DESCRIPTION</u>	<u>MM#</u>	<u>ARSENIC</u> <u>µg/l</u>	<u>LEAD</u> <u>µg/l</u>
RS-7-19-99	75792	<5	<5
FB-7-19-99	75793	<5	<5
TB-7-19-99	75794	<5	<5

METHODOLOGY
EPA 200.7-ICP

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #269-BS-07-99

GULFPORT FERTILIZER COMPANY
7/19/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
T45OE-2'	75823	11.7	1076
T45OE-4'	75824	0.22	780
S26-2'	75825	0.28	<0.2
Duplicate		7.68	<0.2
S26-4'	75826	5.25	<0.2
S28-2'	75827	1.23	5.76
S28-4'	75828	1.08	<0.2
Duplicate		1.62	4.19
S29-2'	75829	3.93	2.59
S29-4'	75830	2.49	4.00
S30-2'	75831	.74	4.50
Duplicate		1.04	4.08
S30-4'	75832	1.24	2.74
S27-2'	75833	1.64	15.12
S27-4'	75834	1.67	3.08
Duplicate		1.87	1.87
T7100E-2'	75835	<.1	2.86
T7100E-4'	75836	0.20	11.6

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic
SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
S40-2' DUPLICATE	75923	1.60	3.52
S40-4' DUPLICATE	75924	3.57	<0.2
S57-2'	75925	1.05	<0.2
S57-4'	75926	<0.05	7.89
S58-2' Duplicate	75927	3.09 3.41	32.1 29.2
S58-4'	75928	0.65	2.79
S59-2'	75929	0.40	6.90
S59-4'	75930	<0.05	1.72
S60-2'	75931	0.84	5.74
S60-4' Duplicate	75932	0.42 0.26	7.25 1.97
S36-2'	75933	0.98	7.83
S36-4'	75934	1.52	1.41
S38-2'	75935	0.50	2.34
S38-4'	75936	0.31	2.09
T9100W-2'	75937	0.52 0.50	32.7 10.75
T9100W-4'	75938	1.74	3.56
S50-2'	75939	702	597
S50-4'	75940	113	12.6

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic

SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
S40-2'	75941	1.27	2.38
S-40-4'	75942	3.50	492
Duplicate		4.54	287
S126-2'	75943	0.40	6.23
S126-4'	75944	0.24	1.97
S98-2'	75945	0.11	<0.20
S98-4'	75946	0.06	0.57
S77-2'	75947	0.07	1.95
Duplicate		<0.05	1.79
S77-4'	75948	<0.05	1.11
S96-2'	75949	0.19	0.58
S96-4'	75950	<0.05	0.65
S94-2'	75951	<0.05	1.99
S94-4'	75952	<0.05	1.07
		<0.05	0.05
N40-2'	75953	0.11	0.79
N40-4'	75954	0.05	1.50
S49-2'	75955	1.19	4.47
S49-4'	75956	0.32	4.51
S48-2'	75957	0.55	45.0
Duplicate		0.37	28.4

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic

SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

<u>SAMPLE DESCRIPTION</u>	<u>MM#</u>	<u>ARSENIC</u> <u>mg/kg</u>	<u>LEAD</u> <u>mg/kg</u>
S48-4'	75958	0.58	4.69
S47-2'	75959	0.69	43.0
S47-4'	75960	0.23	2.55
S37-2'	75961	5.34	6.74
S37-4'	75962	1.35	4.59
Duplicate		2.87	1.98
S56-2'	75963	0.44	4.45
S56-4'	75964	<0.05	0.80
S55-2'	75965	0.07	4.02
S55-4'	75966	<0.05	2.25
S55-2' DUPLICATE	75967	0.05	4.58
Duplicate			4.13
S55-4' FIELD DUPLICATE	75968	<0.05	2.82
S54-2'	75969	<0.05	2.58
S54-4'	75970	<0.05	3.70
S45-2'	75971	4.24	303
S45-4'	75972	23.6	72.2
Duplicate		17.9	49.0
S1110-2'	75973	<0.05	1.76
S1110-4'	75974	<0.05	2.51

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic

SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
S80-2'	75975	<0.05	2.82
S80-4'	75976	1.02	3.92
S75-4'	75977	<0.05	2.92
Duplicate		<0.05	3.17
S124-2'	75978	<0.05	0.44
S124-4'	75979	<0.05	1.13
S112-2' DUPLICATE	75980	<0.05	2.35
S98-2' DUPLICATE	75981	<0.05	4.29
S71-2'	75982	<0.05	0.98
Duplicate		<0.05	3.30
S1210-2'	75983	0.22	<0.2
S1210-4'	75984	0.24	3.87
S128-2'	75985	<0.05	0.32
S122-2'	75986	<0.05	1.39
S122-4'	75987	<0.05	<0.2
Duplicate		<0.05	<0.2
S128-2' DUPLICATE	75988	<0.05	2.07
S44-2'	75989	8.08	73.2
S44-4'	75990	0.68	<0.2
S46-2'	75991	2.98	183

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic
SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
S46-4'	75992	0.77	3.20
Duplicate		0.05	2.26
S34-2'	75993	0.39	0.91
S34-4'	75994	0.18	0.67
S74-2'	75995	<0.05	0.78
S74-4'	75996	<0.05	0.60
S72-2'	75997	<0.05	63.4
Duplicate		0.14	69.4
S72-4'	75998	<0.05	8.34
S73-2'	75999	0.20	0.72
S73-4'	76000	<0.05	0.25
S76-2'	76001	0.60	1.80
S76-4'	76002	<0.05	0.95
Duplicate		<0.05	1.52
S75-2'	76003	<0.05	2.00
S75-2' DUPLICATE	76004	<0.05	0.83
S116-2'	76005	0.62	2.19
S116-4'	76006	<0.05	1.04
S178-2'	76007	0.21	4.05
Duplicate			2.28
S78-4'	76008	<0.05	2.94

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic

SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
S92-2'	76009	0.39	3.61
S92-4'	76010	<0.05	1.28
S114-2'	76011	<0.05	1.79
S114-4' Duplicate	76012	0.07	0.72 0.70
S112-2'	76013	0.10	2.01
S112-4'	76014	<0.05	1.07
S118-2'	76015	0.20	13.1
S118-4'	76016	0.21	5.94
S910-2' Duplicate	76017	0.28 0.31	2.95 4.66
S910-4'	76018	<0.05	0.56

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic
SW 846, 7420-Direct - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY

7/23/99

WATER SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC µg/l	LEAD µg/l	Chromium µg/l
MW1-01U	76019	33	35	
MW1-01F	76020	28	37	15
FIELD BLANK	76022	<5	<5	
Duplicate		<5	<5	
RINSATE	76023	<5	<5	
TRIP BLANK	76024	<5	<5	

METHODOLOGY

EPA 206.2-Furnace - Arsenic

EPA 239.2-Furnace - Lead

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #277-BS-07-99

GULFPORT FERTILIZER COMPANY
7/23/99
FILTER SAMPLES

<u>SAMPLE DESCRIPTION</u>	<u>MM#</u>	<u>ARSENIC</u> <u>Tµg</u>	<u>LEAD</u> <u>Tµg</u>
MW1-01 FILTER	76021	800	250

METHODOLOGY

SW 846, 7060A-Furnace - Arsenic

SW 846, 7421-Furnace - Lead

Butler Services of Mississippi, Inc.

Analysis Request and Chain of Custody Record

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Sample submitted by: Denton Bates / C. Day

Client/Project Name GP Fertilizer Plant

Company		Address		Contact	Project Location		Project No.	
Butler Env -		See above address		Denton Bates	Gulfport, MS		98 HB001	
Field Sample No./ Identification	Date and Time	Gr	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
						TEST	METHOD	
N16-2' 1/2" 0845	7-19-99	X	9155 80Z	Soil	Ice	As, Pb		
N16-4' 0845	7-19-99	X						
N16-6' 0855	7-19-99	X						
N16-8' 0855	7-19-99	X						
N17-2' 0905	7-19-99	X						
N17-4' 0905	7-19-99	X						
N18-2' 0935	7-19-99	X						
N20-2' 0955	7-19-99	X						
N20-4' 0955	7-19-99	X						
<p>Relinquished by: <u>Alvin Day</u> Date: <u>7-19-99</u> Time: <u>1545</u></p> <p>Relinquished by: <u>Brenden Hubbard</u> Date: <u>7-19-99</u> Time: <u>4:50</u></p> <p>Relinquished by: <u>Brenden Hubbard</u> Date: <u>7-19-99</u> Time: <u>1650</u></p>								
<p>SAMPLER REMARKS:</p>								

Seal #

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Sample submitted by: _____

Client/Project Name Gulfport Fertilizer Project				Project No. 98HB001			
Contact Denton Bates			Project Location Gulfport, MS				
Phone: 769-6983 (228)			ANALYSIS REQUESTED				
Field Sample No./ Identification	Date and Time	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil, Sludge, Etc.)	Preservative	TEST	METHOD	REMARKS
RC10-2'	7-14-99 1005	✓	8 oz glass Soil	Ice	As, Pb		
RC10-4'	7-14-99 1005	✓					
RC9-2'	7-14-99 1040	✓					
RC9-4'	7-14-99 1040	✓					
RC8-2'	7-14-99 1050	✓					
RC8-4'	7-14-99 1050	✓					
RC7-2'	7-14-99 1110	✓					report complete 7/28/99
RC7-4'	7-14-99 1110	✓					re. recovery
SI6-2'	7-14-99 1115	✓					
SI6-4'	7-14-99 1115	✓					
Relinquished by: (Signature)		Relinquished by: (Signature)		Date: 7-19-99		Received by: (Signature)	
C. R. Day		C. R. Day		Time: 1545		Brendan Hubbard	
Relinquished by: (Signature)		Relinquished by: (Signature)		Date: 7-19-99		Received by: (Signature)	
Brendan Hubbard		Brendan Hubbard		Time: 4:50			
Relinquished by: (Signature)		Relinquished by: (Signature)		Date:		Received by: (Signature)	
				Time:			
AMPLER REMARKS:				Received for Laboratory: (Signature)			
				Date: 7-19-99			
				Time: 1650			
Data Results to:				Laboratory No.			

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Sample submitted by: Denton Bates / Collin Day

Client/Project Name

Gulfport Fertilizer Plant

Company	See above	Address	Butler	Contact	Denton Bates	Project Location	Gulfport, MS	Project No.	98HB001
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Phone: 228-769-6483

Field Sample No./ Identification	Date and Time	g/g	g/g	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil, Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
							TEST	METHOD	
S17-2'	7-19-99 1130	✓		8 oz glass	Soil	(Ice) NA	AS, Pb		
S17-4'	7-19-99 1130	✓							
S18-2'	7-19-99 1145	✓							
S18-4'	7-19-99 1145	✓							
S19-2'	7-19-99 1155	✓							
S19-4'	7-19-99 1200	✓							
S20-2'	7-19-99 1200	✓							
S20-4'	7-19-99 1200	✓							
T4100E-2'	7-19-99 1320	✓							
T4100E-4'	7-19-99 1320	✓							

report complete
7/28/99
D. Woodbury

Relinquished by: (Signature)		Collin Day EMS	Date: 7-19-99	Received by: (Signature)	Brandon D. Butler	Date: 7-19-99	Intact
Relinquished by: (Signature)		Brandon D. Butler	Time: 15:45	Received by: (Signature)		Time: 15:45	Intact
Relinquished by: (Signature)		Brandon D. Butler	Date: 7-19-99	Received by: (Signature)		Date: 7-19-99	Intact
Relinquished by: (Signature)		Brandon D. Butler	Time: 4:30	Received by: (Signature)		Time: 4:30	Intact
Relinquished by: (Signature)		Brandon D. Butler	Date:	Received for laboratory: (Signature)		Date: 7-19-99	Laboratory No.
Relinquished by: (Signature)		Brandon D. Butler	Time:	Data Results to:		Time: 16:50	

AMPLER REMARKS:

Label #

Analysis Request and Chain of Custody Record

98HB001

Field Sample No./ Identification	Date and Time	QTY	QTY	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
							TEST	METHOD	
450E-2	7-19-99 1335	X		8 oz glass	soil	(ICC) NA	As, Pb	CD 7-19-99	no sample for Pb
450E-4	7-19-99 1335	X							
450N-2	7-19-99 1405	X						CD 7-19-99	
450N-4	7-19-99 1405	X							
TS-2	7-19-99 1410		✓						report completed 7/28/99
TS-4	7-19-99 1410	X							
550N-2	7-19-99 1435		✓						
550N-4	7-19-99 1435		✓						
5100E-2	7-19-99 1455		✓						U. H

Butler Services of Mississippi, Inc.

Analysis Request and Chain of Custody Record

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Sample submitted by: Denton Bates/COLLIN DAY

Client/Project Name

GULFPORT FERTILIZER PLANT

Company

Address

Butler Serv. See address above

Contact: DENTON BATES

Project Location

Phone: 769-6983 GULFPORT, MS

Project No.

984B001

Field Sample No./ Identification	Date and Time	g/g	g/g	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
							TEST	METHOD	
227-21	7-19-99 1650	X	X	8 oz. Soil	Soil	(ICE) NA	As, Pb		
227-41	7-19-99 1650	X	X						
226-21	7-19-99 1635	X	X						
226-41	7-19-99 1635	X	X						
228-21	7-19-99 1705	X	X						
228-41	7-19-99 1705	X	X						
229-21	7-19-99 1725	X	X						
229-41	7-19-99 1725	X	X						
230-21	7-19-99 1735	X	X						
230-41	7-19-99 1735	X	X						

Relinquished by: <u>Collin Day</u> (Signature)		Received by: <u>R.D. Bates</u> (Signature)		Date: <u>7-20-99</u> Time: <u>13:17</u>	Date: <u>7-20-99</u> Time: <u>13:17</u>	Intact
Relinquished by: <u>R.D. Bates</u> (Signature)		Received by: <u>R.D. Bates</u> (Signature)		Date: <u>7-20-99</u> Time: <u>14:19</u>	Date: <u>7-20-99</u> Time: <u>14:19</u>	Intact
Relinquished by: _____ (Signature)		Received by: _____ (Signature)		Date: _____ Time: _____	Date: _____ Time: _____	Intact
ANALYMER REMARKS:						
Date Results to:						
Laboratory No.						

Analysis Request and Chain of Custody Record

ample submitted by: Denton Bates/Cellin Day

Client/Project Name

Company		Address		Contact		Project Location		Project No.	
Butler Serv		Addresses Above		Denton Bates		Gulfport, MS		98H13031	
Field Sample No./ Identification	Date and Time	g/g	g/g	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
							TEST	METHOD	
27-21	7-19-99 1700	X		8oz glass	Soil	(Ice) NA		Pb, As	
27-41	7-19-99 1700	X							
27-14-99 3021									
7100E-21	1740	X							
7100E-41	1740	X							
<p>Report completed 8/3/99</p> <p>D. Doolittle</p>									

Samplers: (Signature)		Relinquished by: (Signature)		Received by: (Signature)		Date: 7-20-99		Time: 13:17		Intact	
Allen Day EMS		Allen Day		R. Doolittle		Date: 7-20-99		Time: 13:17		Intact	
Affiliation		R. Doolittle		R. Doolittle		Date: 7-20-99		Time: 14:19		Intact	
						Date:		Time:		Intact	
						Date:		Time:		Intact	
						Date:		Time:		Intact	

IPILER REMARKS:

Received for laboratory: (Signature) C. R. Doolittle

Date: 7-20-99 Laboratory No. 12419

Data Results to:

Buller Services of Mississippi, Inc.

Analysis Request and Chain of Custody Record

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Sample submitted by:

Denton Bates / C. Day

Client/Project Name

Gulfport Fertilizer Project

Company

Butler Env.

Address

See above address

Contact

Denton Bates


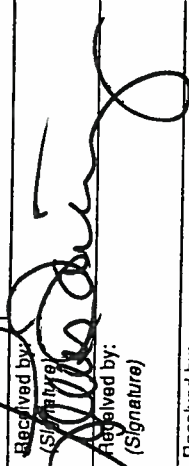
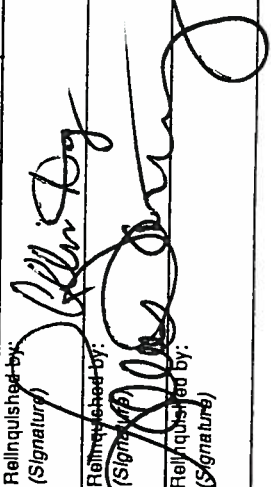
Project Location

Gulfport, MS

Project No.

98H8007

Field Sample No./ Identification	Date and Time	g/g	g/g	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
							TEST	METHOD	
126-2'	7-23-99 1646	X		955 Counter 802	Soil	NA	As, Pb		
126-4'	7-23-99 1646	X							
98-2'	7-23-99 1700	X							
98-4'	7-23-99 1700	X							
577-2'	7-23-99 1712	X							report completed 8/2/99
77-4'	7-23-99 1712	X							12/20/04
96-2'	7-23-99 1727								
96-4'	7-23-99 1727								
94-2'	7-23-99 1754								
94-4'	7-23-99 1754								

Relinquished by: (Signature) 	Date: 7-23-99 Time: 2:40	Received by: (Signature) 	Date: 7-23-99 Time: 9:00 PM	Incl
	Date: 7-23-99 Time: 9:20 PM	Received by: (Signature)	Date: 7-23-99 Time: 9:20 PM	Incl
	Date: 7-23-99 Time: 9:20 PM	Received by: (Signature)	Date: 7-23-99 Time: 9:20 PM	Incl
Relinquished by: (Signature) 				Received for laboratory: (Signature) J. O. Jones
Affiliation				Laboratory No.
ANALYMER REMARKS:				
Seal #				

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Sample submitted by: Denton Bates/Collin Day

Client/Project Name

Gulfport Fertilizer Plant

Address

See above address

Contact Denton Bates

Phone: 228-769-6983

Project Location

Gulfport, ms
Gulfport Fertilizer

Project No.

98HB001

Field Sample No./ Identification	Date and Time	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil, Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
					TEST	METHOD	
V40-2'	7-23-99 744	X	Soil	Ice (NA)		As, Pb	
V40-4'	7-23-99 744	X					
S49-2'	7-23-99 0930	X					
S49-4'	7-23-99 0930	X					
S-48-2'	7-23-99 0925	X					
S-48-4'	7-23-99 0925						sample completed 8/12/99
S-47-2'	7-23-99 0900						
S-47-4'	7-23-99 0830						no. 1000000
S-37-2'	7-23-99 0830						
S-37-4'	7-23-99 0830						
<div> <div>Relinquished by: (Signature) <u>Collin Day</u></div> <div>Relinquished by: (Signature) <u>Collin Day</u></div> <div>Relinquished by: (Signature) <u>Collin Day</u></div> </div>							
<div> <div>Received by: (Signature) <u>Collin Day</u></div> <div>Received by: (Signature) <u>Collin Day</u></div> <div>Received by: (Signature) <u>Collin Day</u></div> </div>					<div> <div>Date: 7-23-99 Time: 2040</div> <div>Date: 7-23-99 Time: 9:20 PM</div> <div>Date: 7-23-99 Time: 9:20 PM</div> </div>		
<div> <div>Received for laboratory: (Signature) <u>Dina B. Jones</u></div> <div>Date: 7-23-99 Time: 9:20 PM</div> </div>							
<div> <div>Relinquished by: (Signature) <u>Collin Day</u></div> <div>Relinquished by: (Signature) <u>Collin Day</u></div> <div>Relinquished by: (Signature) <u>Collin Day</u></div> </div>							
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<div> <div>Date: 7-23-99 Time: 2040</div> <div>Date: 7-23-99 Time: 9:20 PM</div> <div>Date: 7-23-99 Time: 9:20 PM</div> </div>							
<div> <div>Received for laboratory: (Signature) <u>Dina B. Jones</u></div> <div>Date: 7-23-99 Time: 9:20 PM</div> </div>							

AMPLER REMARKS: Tina (home) 875-4582

anal #

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Sample submitted by: Denton Bates / C. Day Client/Project Name: Gulfport Fertilizer Plant

Company: Butler Env. Address: See above Contact: Denton Bates Project Location: Gulfport, ms Project No.: 9845001

Phone: 769-6983

Field Sample No./ Identification	Date and Time	Preservative	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	ANALYSIS REQUESTED		REMARKS
					TEST	METHOD	
56-2'	7-23-99 1200	X	2oz glass	Soil	NA	As, Pb	
56-4'	7-23-99 1200	X					
55-2'	7-23-99 1255	X					
55-4'	7-23-99 1255	X					
55-2'DUP		X					
55-4'DUP		X					
54-2'	7-23-99 1315	X					expedited 8/12/99
54-4'	7-23-99 1315	X					Q. Woodruff
45-2'	7-23-99 1320	X					
45-4'	7-23-99 1320	X					

Relinquished by: William Day Date: 7-23-99 Time: 2040 Received by: [Signature] Date: 7-23-99 Time: 900h

Relinquished by: [Signature] Date: 7-23-99 Time: 920 PM Received by: [Signature] Date: 7-23-99 Time: 920 PM

Relinquished by: [Signature] Date: 7-23-99 Time: 920 PM Received by: [Signature] Date: 7-23-99 Time: 920 PM

AMPLER REMARKS:

Lab #

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Sample submitted by DEAN BATES / COCCIN DRG

Client/Project Name

GULFPORT FERTILIZER PLANT

Project No.

2848001

Field Sample No./ Identification	Date and Time	Grab	Comp	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
							TEST	METHOD	
S1110-2'	7-23-99 2005	X		8oz glass	Soil	NA	As, Pb		
S1110-4'	7-23-99 2005	X							
S80-2'	7-23-99 2015	X							
S80-4'	7-23-99 2015	X							
S75-4'	7-23-99 1530								these samples were shipped but not analyzed
S124-2'	7-23-99 1955								added as per collection stage
S124-4'	7-23-99 1955								urgent analysis 8/12/99
S112-2' Dup	7-23-99 1825								
S98-3' Dup	7-23-99 1700								
S71-2'	7-23-99 1517								10:1000000000
Samplers: (Signature)		Relinquished by: (Signature)		Date: 7-23-99 Time: 2040		Received by: (Signature)		Date: 7-23-99 Time: 900PM	Inact
Allan Day		Allan Day		Date: 7-23-99 Time: 920 PM		Received by: (Signature)		Date: 7-23-99 Time: 920 PM	Inact
Airlition		Relinquished by: (Signature)		Date: 7-23-99 Time: 920 PM		Received by: (Signature)		Date: 7-23-99 Time: 920 PM	Inact
AMPLER REMARKS:									
Seal #									

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Sample submitted by: DEWTON BATES / COCAIN DRY

Client/Project Name

GULFPORT FERTILIZER PROJECT

Company

BUTLER SERVICES

Address

SEE ABOVE ADDRESS

Contact

DEWTON BATES

Project Location

GULFPORT, MS

Project No.

9845001

Phone:

228-769-6983

Field Sample No./ Identification	Date and Time	G.S.	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
						TEST	METHOD	
1210-2'	7-23-99 1933	X						
1210-4'	7-23-99 1933	X						
1218-2'	7-23-99 1948	X						Identified by (signature) lid reads 128-2' Dup
1218-4'	7-23-99 1948	X						no sample returned as per Collins clay core
1222-2'	7-23-99 1830	X						Report completed 10/13/99
1222-4'	7-23-99 1830	X						Identified by (signature) lid reads 128-2'
1228-2 Dup	7-23-99 1948							these samples were used but not on eye
144-2'								Added per Collins clay
144-4'								Labels were not dated, nor did they have a time sample was provided.

Sampers: (Signature) <u>Collin Day EMS</u>	Date: 7-23-99	Received by: (Signature) <u>Collin Day</u>	Date: 7-23-99	Intact
	Time: 2040	Time: 900 PM	Time: 900 PM	Intact
Relinquished by: (Signature) <u>Collin Day</u>	Date: 7-23-99	Received by: (Signature) <u>Collin Day</u>	Date: 7-23-99	Intact
	Time: 920 PM	Time: 920 PM	Time: 920 PM	Intact
Relinquished by: (Signature) <u>Collin Day</u>	Date:	Received by: (Signature)	Date:	Intact
	Time:	Time:	Time:	Intact
IMPLER REMARKS:				
Received for laboratory: (Signature) <u>Dr. B. Jones</u>				
Data Results to:				
Laboratory No.				

Seal #

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Sample submitted by: DEBETON BATES / COCCAN DMI

Client/Project Name

GULFPORT PENTAGON PLANT

Company

3070N SERVICES

Address

SEE ABOVE ADDRESSES

Contact

DEBETON BATES

Project Location

GULFPORT, MS

Project No.

98 H5001

Phone: 228 769-6983

Field Sample No./ Identification

Date and Time

Preservative

Sample Container (Size/Mat'l)

Sample Type (Liquid, Soil, Sludge, Etc.)

TEST

ANALYSIS REQUESTED

METHOD

REMARKS

S46-2'

7-23-99 1340

X

9/435 802

Soil

NA

As Pb

S46-4'

7-23-99 1340

X

S34-2'

7-23-99 1425

X

S34-4'

7-23-99 1425

X

S74-2'

7-23-99 1445

X

S74-4'

7-23-99 1445

X

S72-2'

7-23-99 1500

X

S72-4'

7-23-99 1500

X

S73-2'

7-23-99 1510

S73-4'

7-23-99 1510

Sampers: (Signature)

Date: 7-23-99

Time: 2040

Relinquished by: (Signature)

Relinquished by: (Signature)

Relinquished by: (Signature)

Relinquished by: (Signature)

Relinquished by: (Signature)

Relinquished by: (Signature)

Affiliation

Date: 7-23-99

Time: 9:20 PM

Date: 7-23-99

Time: 9:20 PM

Date: 7-23-99

Time: 9:20 PM

Date: 7-23-99

Time: 9:20 PM

AMPLER REMARKS:

Date: 7-23-99

Time: 9:20 PM

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Date: 7-23-99

Time: 9:20 PM

Intact

Date: 7-23-99

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Sample submitted by: DAVID BATES/COLUMBIA

Client/Project Name

GULFPORT FERTILIZER PLANT

Company

BUTLER SERVICES

Address

806 ASBURY AVE

Contact

DAVID BATES

Project Location

GULFPORT, MS

Project No.

98H5001

Field Sample No./ Identification	Date and Time	g/g	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
						TEST	METHOD	
576-2'	7-23-99 1523	X	g/455 80Z	Soil	NA	As, Pb		
576-4'	7-23-99 1523	X						
575-2'	7-23-99 1530	X						
575-10'	7-23-99 1530	X						
5116-2'	7-23-99 1629	X						report completed 8/12/99
5116-4'	7-23-99 1629	X						P. Woodbury
578-2'	7-23-99 1640	X						
78-4'	7-23-99 1640	X						
77-2'	7-23-99 1712	X						LISTED PREVIOUSLY on page 3-CHS
77-4'	7-23-99 1712	X						LISTED PREVIOUSLY on page 3-CHS

Relinquished by: (Signature)	Date: 7-23-99	Received by: (Signature)	Date: 7-23-99
	Time: 2040	Time: 1600	Intact
Relinquished by: (Signature)	Date: 7-23-99	Received by: (Signature)	Date: 7-23-99
	Time: 920 PM	Time: 1600	Intact
Relinquished by: (Signature)	Date: 7-23-99	Received by: (Signature)	Date: 7-23-99
	Time: 920 PM	Time: 1600	Intact
Relinquished by: (Signature)		Received for laboratory: (Signature) <u>David B. Bates</u>	
Relinquished by: (Signature)		Laboratory No.	
Relinquished by: (Signature)		Data Results to:	

AMPLER REMARKS:

ed #

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Sample submitted by: DEHTON BATES/COLUMBIAS

Client/Project Name

GULFPORT 7 FERTILIZER PLANT 7

Company	Address	Contact	Project Location	Project No.
BUTLER SERVICES	SEE ABOVE ADDRESS	DEHTON BATES Phone: 228 769-6983	GULFPORT 7, MS	98H50012

Field Sample No./ Identification	Date and Time	Gross Weight	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
						TEST	METHOD	
S92-2'	7-23-99 1802	X						
S92-4'	7-23-99 1802	X						
S114-2'	7-23-99 1815	X						
S114-4'	7-23-99 1815	X						
S112-2'	7-23-99 1825	X						
S112-4'	7-23-99 1825	X						
S118-2'	7-23-99 1918	X						
S118-4'	7-23-99 1918	X						
S910-2'	7-23-99 1926	X						
S910-4'	7-23-99 1926	X						

Relinquished by: (Signature) <u>Colin Day</u>	Date: 7-23-99	Received by: (Signature) <u>[Signature]</u>	Date: 7-23-99	Intact
	Time: 2040	Time: 2040	Time: 2040	Intact
Relinquished by: (Signature) <u>[Signature]</u>	Date: 7-23-99	Received by: (Signature) <u>[Signature]</u>	Date: 7-23-99	Intact
Relinquished by: (Signature) <u>[Signature]</u>	Time: 920 PM	Time: 920 PM	Time: 920 PM	Intact
AMPLER REMARKS:		Received for laboratory (Signature) <u>Dr. G. Jones</u>		
Seal #		Data Results to:		

repaired
8/2/99
D. Wood

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Sample submitted by:

Denton Bates / Tony Stuart

Company

Butler Services

Address

see above

Contact

Denton Betts

Phone: 228/ 769-6983

Client/Project Name

Gulfport Fertilizer Plant

Project Location

Location
Gulfport Fertilizer
Gulfport, MS

Project No.

9845001

Field Sample No./ Identification	Date and Time	Grab	Core	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
							TEST	METHOD	
MW1-01U	7-23-99 11:10 AM			1 Liter	Liquid			Lead, Arsenic, Chrome	
MW1-01F	" "			"	"			" "	
MW1-01 FILTER	" "			250 ml	Filter			Hold for instructions	
Trip Blank	7-23-99 L 1746			1 LITER	Liquid	yds			
Bennate	7-23-99 L 1750			1 LITER	Liquid	yds			
Trip Blank	7-19-99 L 1748			1 LITER	Liquor	yds			
Sampers: (Signature) <i>Toy Stach</i>				Relinquished by: (Signature) <i>Toy Stach</i>	Date: 7-23-99 Time: 16:15	Received by: (Signature) <i>John Day</i>	Date: 7-23-99 Time: 16:18	Inact	
Affiliation <i>EHS</i>				Relinquished by: (Signature) <i>John Day</i>	Date: 7-23-99 Time: 2040	Received by: (Signature) <i>[Signature]</i>	Date: 7-23-99 Time: 9:00 PM	Inact	
SAMPLER REMARKS:				Relinquished by: (Signature) <i>[Signature]</i>	Date: 7-23-99 Time: 9:00 PM	Received by: (Signature) <i>[Signature]</i>	Date: 7-23-99 Time: 9:20 PM	Inact	
Seal #				Received for laboratory: (Signature) <i>J.P. Jones</i>	Data Results to:			Laboratory No.	

ANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MS DEPT ENV

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL

No. 191465

Invoice
3746984

Reference *Gpt Fertilizer*
28 staff hours 2 hrs @ \$75.00/hr for 6-99
Check Date = 08/18/99

Inv Date
08/17/99

Amount Paid
2,100.00

Check Total = 2,100.00

FILE COPY

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 191465

HANCOCK BANK \$2,100dols00cts

DATE

AMOUNT

08/18/99

****2,100.00

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY
~~OAS, ATTN: FEE SECTION~~
P.O. BOX 20325
JACKSON, MS 39289-1325

⑈0191465⑈ ⑆065503681⑆ 01 0129100⑈

George A. Schlegel





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

July 30, 1999

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

FILE COPY

Invoice 3746984

28 Staff hour @ \$75.00/Hr. for 06/99	\$2,100.00
---------------------------------------	------------

Total Amount Due	<u>\$2,100.00</u>
-------------------------	--------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$2,100.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PJ*
DATE: July 30, 1999
SUBJECT: Site Visit

On July 23, 1999, I traveled to the above referenced site to witness the remainder of the field work to be conducted as outlined in the Revised Site Characterization Work Plan dated June 23, 1999. During the purging of monitoring well two (MW-2), it was discovered that the well had been compromised. The water coming from the well was black with a sewage odor. The water also appeared to have pieces of grout in it. It was decided that the well could not be sampled.

I collected a filtered and unfiltered split sample from MW-1. The filter was also collected so that it could be digested at the lab and a total metals concentration given for the filtered sample. I also collected split samples from six (6) soil borings: S56-4', S46-2', S74-4', S96-2', S114-2', S1210-4'. The samples were taken to the OPC lab to be analyzed for total arsenic and total lead.

C:\MyFiles\Gulfport Fertilizer\Gulfport Fertilizer Site Visit Memo 7-30-99 (pj).wpd



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PJ*
DATE: July 21, 1999
SUBJECT: Site Visit

On July 19, 1999, I traveled to the above referenced site for my initial site visit and to conduct the field work outlined in the Revised Site Characterization Work Plan dated June 23, 1999. Mr. David Marshall of Hancock Bank was onsite to oversee the bush-hogging of the site. Mr. Louis Fortenberry and Mr. Denton Bates of Butler Services were on site to oversee the subcontractor, EMS. Mr. Clyde Woodward, Mr. Collin Day, Mr. Robbie Gates, Mr. John Dobson, and Mr. Jeff Gonsoluin, of EMS were on site to collect the geoprobe and groundwater samples. John Dobson operated the Geoprobe rig, Collin Day and Robbie Gates logged and collected the soil samples, and Jeff Gonsoluin decontaminated the sampling equipment.

The site work was scheduled for July 19 - 21, 1999. Groundwater samples were scheduled to be collected on the 21st after all of the soil samples had been collected. We decided to move the sampling of monitoring well 1 to the 20th so I could collect a split sample. EMS began purging MW-1 at about 6:30 the morning of the 20th. However, due to severe thunderstorms in the area, the field work had to be canceled for the day. No field work other than the purging of MW-1 was conducted on the 20th due to the thunderstorms. The field work has been tentatively rescheduled for July 23rd. Butler Services will contact me on the 22nd so we can discuss whether or not the field work will be conducted on the 23rd.

I collected split samples from T450E, T450S, and S26. These samples were taken to the OPC lab to be analyzed for total arsenic and lead. Samples T450E and T450S will also be analyzed for TCLP.

C:\MyFiles\Gulfport Fertilizer\Gulfport Fertilizer Site Visit Memo 7-21-99 (pj).wpd

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612

HANCOCK BANK

POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

No. 188841

85-368/655

HANCOCK BANK \$1,425dols00cts

DATE

AMOUNT

PAY
TO THE
ORDER
OF:

MISSISSIPPI DEPT. OF ENVIRONMENTAL
QUALITY

07/09/99

***1,425.00

FILE COPY

JUL 1999
RECEIVED
AS/BS
FEES

⑈0188841⑈ ⑆065503681⑆ 01 0129100⑈

George A. Schlegel



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

July 9, 1999

FILE COPY

Ms. Joy Phillips
Hancock Bank of Gulfport, Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Site
Revised Site Characterization Work Plan dated June 23, 1999
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced work plan submitted by Butler Services on behalf of Hancock Bank. The work plan is approved. The field work is scheduled to occur July 19, 20, and 21, 1999. You shall provide MDEQ with the appropriate sample containers and preservatives should MDEQ request to split samples. If you have any questions or comments regarding this matter, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Section

cc: Mr. Denton Bates, P.E. Butler Services, Inc.

C:\MyFiles\Gulfport Fertilizer\Gulfport Fertilizer Work Plan Approval Letter 7-7-99 (pj).wpd



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

June 30, 1999

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 3746983

19 Staff hour @ \$75.00/Hr. for 05/99	\$1,425.00
Total Amount Due	<u>\$1,425.00</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$1,425.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Anita Gray, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PJ*
DATE: June 28, 1999
SUBJECT: Phone Conversation

On the above referenced date I spoke with Mr. Louis Fortenberry of Butler Services regarding the June 23, 1999, submission of the Revised Site Characterization Work Plan. The cover letter states that an 8½ X 11 corrected background sample location drawing was included in the submission. However, there was no map included. Mr. Fortenberry said that the map did not change from the June 14, 1999, revision so he chose not to include another copy.

Mr. Fortenberry asked when they could schedule the sampling event to take place. I told him I was available July 6 and 7, possibly July 13 and 14, or the week of July 19. He said he would check with his subcontractors and get back to me.

C:\MyFiles\Gulfport Fertilizer\Gulfport Fertilizer Phone Conversation Memo 6-28-99 (pj).wpd

Butler Services of Mississippi, Inc.
- Environmental Consulting Services-

June 23, 1999

FILE COPY



MS. Penelope A. Johnston, Environmental Engineer
MDEQ, OPC, Uncontrolled Sites
P.O. Box 10385
Jackson, MS 39289-0385

Dear MS Johnston,

Denton Bates called in and requested that a correction be made on background sample number four (4) to reflect the correct data on the guide sheet and in the text.

. To make it easy, I hope, I am sending you the entire work plan text plus the 3 ½ X 11 corrected background sample location drawing.

Thank you for your patience.

Sincerely

A handwritten signature in cursive script that reads "Louis Fortenberry".

Louis Fortenberry

CC: Charles Webb
Joy Lambert Phillips

BACKGROUND SAMPLES*

SAMPLE NO.	SAMPLE ID	SAMPLE STATUS
SAMPLE NO. 1	NW Corner	WORK PLAN SAMPLING
SAMPLE NO. 2	30N38	As 0.5 1.8
SAMPLE NO. 3	30N34	As 0.9 <0.1
SAMPLE NO. 4*	30N33	As 0.6 0.5
SAMPLE NO. 5	30RC1	As 0.8 0.6
SAMPLE NO. 6	West Property Line	WORK PLAN SAMPLING
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SAMPLE NO. 10	South Property Line	WORK PLAN SAMPLING
SAMPLE NO. 11	South Property Line	WORK PLAN SAMPLING
SAMPLE NO. 12	South Property Line	WORK PLAN SAMPLING

** Corrected Sample No. 4, June 22, 1999.*

**WORK PLAN
SITE CHARACTERIZATION REPORT**

**FORMER GULFPORT FERTILIZER PLANT SITE
33' STREET
GULFPORT, MISSISSIPPI**

**PREPARED
FOR
THE HANCOCK BANK
COMMERCIAL LOAN DEPARTMENT
2510 14TH STREET
GULFPORT, MS 39501**

**PREPARED BY
BUTLER SERVICES OF MISSISSIPPT INC.
PO Box 1164
PASCAGOULA, MISSISSIPPI 39568-1164
(228) 769-6983**

**May 1999
(Revised June 3, 1999)
(REVISED June 14, 1999)**

TABLE OF CONTENTS

	<u>Page No.</u>
1.0 BACKGROUND	1
1.1 SAMPLING RATIONAL	1
1.2 PREVIOUS INVESTIGATIONS	2
2.0 OBJECTIVES	3
3.0 INVESTIGATIVE ACTIVITIES	3
3.1 SITE RECONNAISSANCE & GRID MARKING	4
3.2 DETERMINATION OF ARSENIC BACKGROUND CONCENTRATIONS	4
3.3 SUBSURFACE SOIL DETERMINATION	5
3.4 SOIL LEACHABILITY	7
3.5 GROUNDWATER SAMPLING	8
4.0 HEALTH AND SAFETY	9
5.0 SITE CHARACTERIZATION	9

FIGURES

Figure 1 - Site Location/Vicinity Map

Figure 2 - Site Map

Figure 3 - Proposed Soil Sample Locations

**SITE CHARACTERIZATION
WORK PLAN
FORMER GULFPORT FERTILIZER PLANT
GULFPORT, MISSISSIPPI**

1.0 BACKGROUND

The subject property is an approximate 33.06-acre parcel of land located on 33rd Street approximately one block west of its intersection with State Highway 49 in Gulfport, Mississippi. The Gulfport Fertilizer Company, which closed for business in circa 1960, was formerly located on the subject property. The fertilizer company reportedly manufactured superphosphate fertilizer. Improvements to the land once consisted of concrete buildings, surfaced roads and railroad spurs, but the improvements have been largely destroyed.

1.1 Sampling Rational.

Background information contained in the Phase I Environmental Assessment conducted by Covington & Associates, Inc. (Covington) and reviewed by Butler Services of Mississippi, Inc. (Butler Services) revealed that the subject site was used predominately for the production of phosphate fertilizer. There was no evidence of activities that would generate hazardous substances from the other operations that were briefly located at the site over the fifty or so years the site was utilized for industrial and manufacturing purposes other than the phosphate fertilizer operations. Further, samples collected by Covington as a part of a limited Phase II Environmental Assessment of a portion of the site were analyzed for metals, volatiles, semi-volatiles and pesticides. The constituents of concern identified with elevated levels in the soils were lead and arsenic.

Butler Services obtained additional information regarding the composition of phosphate rock used in fertilizer plant operations from a local manufacturer. When the phosphate fertilizer plant was in operation the type of phosphate commonly manufactured at that time was normal super-phosphate. Normal super-phosphate is manufactured by introducing sulfuric acid to phosphate rock (tri-calcium-phosphate). Typically, the phosphorous pentoxide, referred to as P2O5, and calcium oxide content of the rock used in production at the time the plant was operating was about 33% and 48%, respectively. The remainder of the constituents in the phosphate rock consisted of lead and arsenic as well as a low percentage of other compounds such as aluminum,

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

iron, carbon dioxide, fluorine and miscellaneous trace elements. Hence, based upon the foregoing, lead and arsenic were identified as the constituents of concern.

1.2 Previous Investigations.

A subsurface investigation was conducted by Covington for a potential purchaser in May and June of 1998. The investigation focused on an area approximately 720 feet (ft.) by 720 ft. in the northern half of the 33.06-acre parcel. Exploratory soil pits and two 4-inch diameter monitoring wells were installed during this investigation. The results of soil samples collected by Covington at the site indicated that elevated levels of lead (ranging up to 11,000 milligrams per kilogram (mg/kg)) and arsenic (ranging up to 1,310 mg/kg) contamination exists in the subsurface soils. Contamination at low levels was shown to exist in the groundwater, as well

On September 30 and October 1, 1998, Butler Services performed soil and groundwater sampling using direct push probes and groundwater sampler as manufactured by Geoprobe. The primary purpose of this subsurface investigation was to characterize a 7.9-acre portion of the subject property along the eastern boundary. The results of the soil samples collected within the 7.9 acre parcel indicated lead and arsenic levels in subsurface soils ranging from less than 0.1 mg/kg to 306 mg/kg and from less than 0.1 mg/kg to 10.2 mg/kg, respectively with the exception of two distinct areas. One of the areas with subsurface soil contamination is located adjacent to the former railroad spur, approximately 800 feet south of the northeast corner of the subject property. The second area with subsurface soils that contained elevated levels of arsenic only is located 400 ft. south and 300 ft. west of the northeast corner of the subject property. Additional soil sampling was conducted in an isolated area adjacent to the former railroad spur on October 21, 1998 and February 12, 1999. The analytical results from this additional sampling indicate that lead contamination exceeding 400 mg/kg and arsenic contamination exceeding 15 mg/kg are confined to the property in an area approximately 20 ft by 20 ft. Lead and Arsenic levels in the groundwater samples collected along the eastern property boundary and western perimeter of the 7.9 acre parcel were all less than the laboratory detection limits of 0.005 milligrams per liter (mg/l) with the exception of samples collected in an area near the former railroad spur. The samples in this isolated area correlate with the elevated levels found in the soil in this same area.

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

Iso-concentration maps were prepared utilizing the analytical results from the Butler Services and Covington investigations. The source areas from the maps appear to be located in an area in the northern half of the property that was identified in the aerial photographs and background information in the Phase I Environmental Assessment. This area is located where the primary fertilizer plant operations were centered.

2.0 OBJECTIVES

The objectives of this phase of the work is to (1) delineate the extent of subsurface contamination in the soils of the remainder of the approximate 33 acre subject property; (2) develop background concentration levels for determining action levels, and (3) collect soil samples in the southern half of the subject property to mitigate any future questions as to the levels of constituents in this area. Discreet soil samples will be collected at depths in the source areas to supplement the exploratory pit and composite surface samples collected by Covington. The purpose of the discreet samples is to better define the horizontal and vertical extent of contamination in the source areas.

The Mississippi Department of Environmental Quality (MDEQ) will be notified a minimum of two (2) weeks prior to conducting any field work or sampling event. The MDEQ will be provided the opportunity to observe field work and collect split samples. Butler Services will provide MDEQ with the appropriate sample containers and preservatives should MDEQ request split samples.

3.0 INVESTIGATIVE ACTIVITIES

The investigative activities to be conducted on the remainder of the 33-acre site for delineating the extent of subsurface soil contamination on the subject property are outlined hereinafter. These work plan investigative activities include the collection of subsurface soil samples and the re-sampling of groundwater monitoring wells. Groundwater from the monitoring wells installed during the limited Phase II Environmental Assessment conducted by Covington was found to contain low levels of lead (Pb), Arsenic (As) and Chromium (Cr) contamination and will be re-sampled as a part of the work plan activities. Soil and groundwater sampling will be in general accordance with the procedures outlined in USEPA, Region IV's "*Environmental Investigations Standard Operating Procedures and Quality Assurance Manual*" (EISOPQAM).

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

3.1 Site Reconnaissance & Grid Marking

Prior to initiating, subsurface drilling activities Mississippi One Call System, Inc. will be contacted to mark the location of any gas, water, and sewer or buried electrical lines at the site. Traffic cones and caution tape will be used as necessary to restrict traffic into work areas. No permit requirements are anticipated for use of the direct-push equipment during the investigation.

The areas to be investigated will be measured and staked in a grid pattern. A 100-foot horizontal grid for sampling will be extended from the east to the west in the area of the former plant operations on the northern half of the property. In addition, 200-foot grid pattern will be extended east to the west to the southern property line of the subject property. Although, there has been no evidence developed to date that any significant industrial/manufacturing activities occurred in the southern portion of the subject property, Butler has been requested to collect soil samples in this area to mitigate any future questions as to the levels of constituents in this area. The proposed soil sampling locations are identified in "Work Plan Proposed Soil Sample Locations," Figure No. 3. Flags will be placed at the specific grid points to mark where soil borings are to be advanced.

3.2 Determination of Arsenic Background Concentrations.

It is proposed that eight (8) random background soil samples be collected along the perimeter of the subject property to establish background concentrations of arsenic (As) in the native soils resulting from naturally occurring or anthropogenic sources. The background soil samples will be analyzed for arsenic using United States Environmental Protection Agency (USEPA) Method SW 846, 7060A and/or Method SW 846, 6010A-ICP.

The eight (8) proposed locations to be sampled as a part of this Work Plan as well as four (4) proposed locations (30RC1, 30N34, 30N33, 30N38), previously sampled by Butler Services, where the data is to also be used for developing background concentrations are shown on Figure 3. This soil data from the twelve locations will then be used to develop background limits based on guidance from USEPA Engineering Forum Issue: "*Determination of Background Concentrations of Inorganics in Soils and Sediments at Hazardous Waste Sites*", December 1995.

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

Pursuant to MDEQ requirements, the background samples will be collected from the same sampling intervals, 2-feet and 4-feet, as the investigative soil samples. Background samples will be taken from areas outside of suspected hazardous waste activities identified in the Phase I Environmental Assessment and/or source areas delineated on the Iso-concentration maps prepared from previous subsurface sampling activities on the subject property.

The type(s) of soil underlying the site and their characteristics were also considered in selecting the location and number of background samples for analyses. The three distinctive soil types within the boundaries of the subject property are the Harleston, Atmore, and Plummer series according to soil survey information available from the Natural Resources Conservation Service, Soil Series Survey. The predominate soil type underlying 90 to 95 percent (%) of the subject property is the Harleston series. The Atmore and the Plummer soil types are located along the eastern and northern property boundary, respectively.

The Harleston series, a non-hydric soil type, is a yellowish-brown to pale-brown loamy sand overlain by 0 to 8-inches of very dark grayish brown loamy sand. These soil characteristics were observed during the subsurface investigation of the 7.9-acre portion of the subject property conducted by Butler. These soil characteristics were noted down to the water-bearing zone, which was encountered approximately 4-feet below ground surface at the site. The background soil samples will be collected from the Harleston soil type only since it is the predominate soil type that underlies the suspected areas of the fertilizer plant activities.

3.3 Subsurface Soil Delineation

The subsurface investigation in the area of the former plant activities will include advancing 37 direct-push probes with a soil-probing machine, as manufactured by Geoprobe, to further delineate the extent of soil contamination in this area. The Geoprobe is a vehicle mounted hydraulically powered soil probing machine that uses static force and percussion to advance sampling tools into the subsurface to collect soil, groundwater or vapor samples.

Although, there has been no evidence developed to date to indicate that any significant industrial/manufacturing activities occurred on the southern one-half of the property, Butler has been requested to collect soil samples to mitigate any future questions as to the levels of

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

constituents in this area. It is anticipated that 20 direct-push probes will be advanced by Geoprobe on a 200-foot grid in the southern portion of the subject property.

The soil borings in the areas noted above will be advanced using Geoprobe's Macro-core soil sampler, a 48-inch long by 2-inch diameter soil sampler capable of recovering a sample that measures up to 1300 ml in volume in the form of a 46-inch x 1.5-inch core. A releasable probe point will be attached to the bottom of the sampling tube to prevent soil from entering the tube until the sampling depth is reached. The sampler will be pushed into the soil with connected 4-foot long hollow probe rods. Once the sample depth is reached the point will be released and the sampling tube will be driven into undisturbed soil. Soil samples will be collected using new clear PVC sample collection liners that are approximately 46-inch long by 1.75-inches in diameter. Soil samples collected will be logged at two-foot intervals to a suspected maximum depth of five feet below ground surface (bgs) or until groundwater is encountered, whichever occurs first. It is anticipated that groundwater will be encountered less than five feet bgs. After samples had been collected from the soil cores, the remaining soil will be drummed and characterized for disposal in a permitted facility. The boring will then be sealed to the ground surface with Bentonite.

The sampler and sample tubes will be cleaned using tap water and Liquinox. A brush will be used, if necessary, to remove particulate matter and surface films during cleaning. The equipment will then triple rinsed thoroughly with tap water, analyte free water and pesticide-grade isopropanol followed by a final rinse of analyte free water only. If analyte free water is not available, the equipment will be allowed to air dry following the solvent rinse. A solvent rinse will not be applied to PVC items or plastic items. Once the equipment has been cleaned it will be removed from the decontamination area and covered with aluminum foil when not in use. Equipment to be stored overnight will be wrapped in aluminum foil and covered with clean, unused plastic. The rinsate will be containerized and transferred to drums for characterization and disposal off-site in a permitted facility.

It is estimated that a total of 114 soil samples will be collected for independent laboratory analysis. As a part of the field Quality Assurance and Quality Control (QA/QC) program, replicate samples at a rate of 5 percent for each matrix and a daily equipment field blank sample will be prepared similarly for delivery to the laboratory. The samples will be transferred to new

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

laboratory furnished, glass sample jars, sealed with a teflon-lined cap and labeled. The samples will then be placed into plastic zip-lock bags and delivered to Micro Methods Laboratory in Ocean Springs, Mississippi in a chilled condition for analyses. A chain-of-custody will be maintained to trace sample custody.

The soil samples will be analyzed by the laboratory for lead (Pb) and arsenic (As) using USEPA Methods SW 846, 7420 and SW 846, 7060A, respectively. The laboratory analytical data sheets will state the minimum quantifiable level (MQL) for each constituent and the dilution factor for each sample.

3.4 Soil Leachability

For the purpose of evaluating soil leachability, additional samples will be collected at locations identified as T-4 50'N, T-4 50'S, T-4 50'E, T-5, T-5 50'N, T-5 50'E, T-7 100'E and T-9 100'W on the maps furnished by Covington and as shown on Figure 3 herein. If we are unable to field locate the flagging, stakes and/or field markings identifying these locations, Butler Services will attempt to re-established the locations using the scaled map drawing furnished by Covington.

The analytical results of the previous sampling conducted by Covington during the limited Phase II Site Assessment indicated that the soil at the locations identified above contained high levels of lead (Pb) and arsenic (As). The subsurface soils at the identified locations will be re-sampled as a part of this Work Plan. Samples will be collected at the same sampling intervals bgs as the delineation soil samples and analyzed for total lead (Pb) and total arsenic (As). A total of five (5) soil samples will be selected for analyses of leachability, based upon the laboratory results of the delineation samples (Task 3.3) and additional sampling identified herein, at the locations and depths with the highest concentrations of total lead (Pb) and total arsenic (As).

The soil samples will be analyzed for total lead and total arsenic using USEPA Methods SW 846, 7420 and SW 846, 7060A, respectively and leachability using USEPA's Toxic Characteristic Leaching Procedure (TCLP).

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

3.5 Groundwater Sampling

The two (2) monitoring wells installed by Covington as a part of a limited Phase II Environmental Assessment of a portion of the site, identified on the drawings as MW-1 and MW-2, will be re-sampled as a part of this work plan. The wells will be purged and sampled in general accordance with the procedures outlined in USEPA, Region IV's "*Environmental Investigations Standard Operating Procedures and Quality Assurance Manual*" (EISOPQAM). If the groundwater is found to be contaminated a work plan will be prepared for the delineation of the vertical and horizontal extent of contamination. The work plan will be submitted to MDEQ for review and approval prior to initiating any further groundwater assessment activities.

A licensed land surveyor will survey the wells in to a benchmark of known elevation above mean sea level. The depth to groundwater will also be measured in each well using a Solinst water level meter or equivalent, originating at a specific point on the well casing prior to collecting groundwater samples.

The wells will be purged using a slow purge method. Sampling will be performed after each well has achieved at least 80 per cent (%) recharge; the temperature, pH and conductivity of the groundwater has stabilized as indicated by three consecutive Hydac or equivalent instrument readings within 10 % and the water is free of suspended and settleable matter. A new disposable bailer will be used to collect the groundwater sample from each well. The bailed water from each well will be transferred into new 1 liter, laboratory furnished and nitric acid preserved, plastic sample containers. As a part of the field QA/QC program, a field equipment blank sample will be prepared similarly for delivery to the laboratory. As each sample is collected, it will then be stored in a chilled ice chest for delivery to Micro Methods Laboratory in Ocean Springs, Mississippi for analyses. A chain-of-custody will be maintained to trace sample custody.

The laboratory will analyze the samples for lead (Pb), arsenic (As), and chromium (Cr) using USEPA Methods 239.2, 206.2 and 218.2, respectively. The laboratory analytical data sheets will state the minimum quantifiable level (MQL) for each constituent.

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

3.0 HEALTH AND SAFETY

The field sampling work will be performed under a written Health and Safety Plan (HASP) prepared by Butler Services. A Health and Safety meeting will be held at the site with the Geoprobe subcontractor and Butler personnel prior to initiating any site activities. A Site Safety Officer will be designated to see that the work is performed according to the HASP.

4.0 SITE CHARACTERIZATION REPORT

After completion of site activities and receipt of laboratory data and analyses, Butler Services will prepare a Site Characterization Report. The report will include a summary of the work that was conducted, the procedures that were used, pertinent findings, conclusions regarding the extent of contamination present at the site, and recommendations for further assessment work, if warranted.

The Site Characterization Report will be submitted to the MDEQ within sixty (60) days after completion of field activities and receipt of laboratory data and analyses.



RECEIVED
JUN 25 1999
Dept. of Environmental Quality
Office of Pollution Control

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June 24, 1999

Via Facsimile and Regular Mail

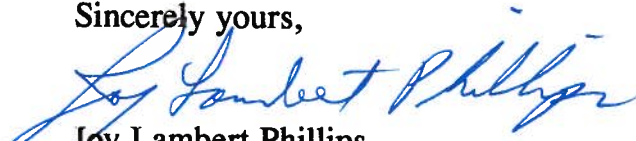
Penelope "Penny" Johnston
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

Re: Gulfport Fertilizer Plant, File No. 99.117

Dear Penny:

I received the attached facsimile from Louis Fortenberry today. I was not sure if you had received this correction. I presume Louis was able to answer your questions, but if you need anything else from any of us, don't hesitate to call. Thank you for your assistance.

Sincerely yours,


Joy Lambert Phillips
General Counsel

jdr/

Attachment

Legal.99.117.Johnson.memo.6.24.99

FAX

to - Joy Phillips

fax number - 1-228-868-4496

phone number -

from - Louis W. Fortenbery

fax number - (228) 769-1219

phone number - (228) 769-6983

number of pages - 1

date - 6/24/99

DEQ CHANGES



Joy

The two sheets with the changes failed to feed into the fax. I hope they go thru this time.

Louis

[REDACTED]		
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* Corrected Sample No. 4, June 22, 1999.

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FORMER GULFPORT FERTILIZER PLANT**

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HANCOCK BANK LEGAL OFFICE
FACSIMILE TRANSMITTAL SHEET

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DATED:

TO:

TELECOPIER NUMBER:

FROM:

Joy Lambert Phillips, Esquire
FAX (228) 868-4496

Number of Pages Transmitting: 5 (Including cover page)

If you do not receive the number of pages
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problems with this transmission, please
contact Jennifer Rahrer at 228-868-4445.

Comments:

FAX

to - Joy Phillips

fax number - 1-228-868-4496

phone number -

from - Louis W. Fortenbery

fax number - (228) 769-1219

phone number - (228) 769-6983

number of pages - 1

date - 6/24/99

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June 24, 1999

Via Facsimile and Regular Mail

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P. O. Box 10385
Jackson, MS 39289-0385

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**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

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Butler Services of Mississippi, Inc.



**HANCOCK
BANK**

JOY LAMBERT PHILLIPS
General Counsel

June 15, 1999

RECEIVED
JUN 17 1999
Dept. of Environmental Quality
Office of Pollution Control

Penelope "Penny" Johnston
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289.385

FILE COPY

RE: Gulfport Fertilizer Plant
File No: 99.117

Dear Ms. Johnston:

Please find attached hereto revision pages for the June 3, 1999 Work Plan prepared by Butler Services. Also enclosed in this package is a color coded map indicating the background samples as well as the TCLP samples. Per your request, Louis Fortenberry has included (8) eight TCLP samples and noted in those locations in blue on the diagram. Background samples are noted in green on the diagram.

I hope these revisions meet with your approval and I would like to thank you for all of your assistance and cooperation on this matter. If you should need anything else regarding this matter, please don't hesitate to call me.

Sincerely,

Joy Lambert Phillips
General Counsel

Enclosure

JLP/cjp

cc: Charlie Webb w/o enclosures
Trudy Fisher, Esquire
Louis Fortenberry w/o enclosures

G:\Legal\99.117 Gulfport Fertilizer\Johnson Ltr re Revised Work Plan.doc

One Hancock Plaza / Post Office Box 4019 / Gulfport, MS 39502
228-868-4445 / Fax 228-868-4496 / 1-800-522-6542



**WORK PLAN
SITE CHARACTERIZATION REPORT**

**FORMER GULFPORT FERTILIZER PLANT SITE
33' STREET
GULFPORT, MISSISSIPPI**

**PREPARED
FOR
THE HANCOCK BANK
COMMERCIAL LOAN DEPARTMENT
2510 14TH STREET
GULFPORT, MS 39501**

**PREPARED BY
BUTLER SERVICES OF MISSISSIPPI INC.
PO Box 1164
PASCAGOULA, MISSISSIPPI 39568-1164
(228) 769-6983**

**May 1999
(Revised June 3, 1999)
(REVISED June 14, 1999)**

3.1 Site Reconnaissance & Grid Marking

Prior to initiating subsurface drilling activities Mississippi One Call system, Inc. will be contacted to mark the location of any gas, water, and sewer or buried electrical lines at the site. Traffic cones and caution tape will be used as necessary to restrict traffic into work areas. No permit requirements are anticipated for use of the direct-push equipment during the investigation.

The areas to be investigated will be measured and staked in a grid pattern. A 100-foot horizontal grid for sampling will be extended from the east to the west in the area of the former plant operations on the northern half of the property. In addition, 200-foot grid pattern will be extended east to the west to the southern property line of the subject property. Although, there has been no evidence developed to date that any significant industrial/manufacturing activities occurred in the southern portion of the subject property line of the subject property. Butler has been requested to collect soil samples in this area to mitigate any future questions as to the levels of constituents in this area. The proposed soil sampling locations are identified in "Work Plan Proposed Soil Sample Locations," Figure No. 3. Flags will be placed at the specific grid points to mark where soil borings are to be advanced.

3.2 Determination of Arsenic Background Concentrations

It is proposed that eight (8) random background soil samples be collected along the perimeter of the subject property to establish background concentrations of arsenic (As) in the native soils resulting from naturally occurring or anthropogenic sources. The background soil samples will be analyzed for arsenic using United States Environmental Protection Agency (USEPA) Method SW 846, 7060A and/or Method 846, 6010A-ICP.

The eight (8) proposed locations to be sampled as a part of this Work Plan, as well as four (4) locations (30RC1, 30N34, 30N35, 30N38), previously sampled by Butler Services, where the existing data is to also be used for developing background concentrations, are shown on Figure 3. This soil data from the twelve locations will then be used to develop background limits based on guidance from USEPA Engineering Forum Issue: "*Determination of Background Concentrations of Inorganics in Soils and Sediments at Hazardous Waste Site*", December 1995.

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

Pursuant to MDEQ requirements, the background samples will be collected from the same sampling intervals, 2-feet and 4-feet, as the investigative soil samples. Background samples will be taken from areas outside of suspected hazardous waste activities identified in the Phase I Environmental Assessment and/or source areas delineated on the Iso-concentration maps prepared from previous subsurface sampling activities on the subject property.

The type(s) of soil underlying the site and their characteristics were also considered in selecting the location and number of background samples for analyses. The three distinctive soil types within the boundaries of the subject property are the Harleston, Atmore, and Plummer series according to soil survey information available from the Natural Resources Conservation Service, Soil Series Survey. The predominate soil type underlying 90 to 95 percent (%) of the subject property is the Harleston series. The Atmore and the Plummer soil types are located along the eastern and northern property boundary, respectively.

The Harleston series, a non-hydric soil type, is a yellowish-brown to pale-brown loamy sand overlain by 0 to 8-inches of very dark grayish brown loamy sand. These soil characteristics were observed during the subsurface investigation of the 7.9-acre portion of the subject property conducted by Butler. These soil characteristics were noted down to the water-bearing zone, which was encountered approximately 4-feet below ground surface at the site. The background soil samples will be collected from the Harleston soil type only since it is the predominate soil type that underlies the suspected areas of the fertilizer plant activities.

3.3 Subsurface Soil Delineation

The subsurface investigation in the area of the former plant activities will include advancing 37 direct-push probes with a soil-probing machine, as manufactured by Geoprobe, to further delineate the extent of soil contamination in this area. The Geoprobe is a vehicle mounted hydraulically powered soil probing machine that uses static force and percussion to advance sampling tools into the subsurface to collect soil, groundwater or vapor samples.

Although, there has been no evidence developed to date to indicate that any significant industrial/manufacturing activities occurred on the southern one-half of the property, Butler has been requested to collect soil samples to mitigate any future questions as to the levels of

laboratory furnished, glass sample jars, sealed with a teflon-lined cap and labeled. The samples will then be placed into plastic zip-lock bags and delivered to Micro Methods Laboratory in Ocean Springs, Mississippi in a chilled condition for analyses. A chain-of-custody will be maintained to trace sample custody.

The soil samples will be analyzed by the laboratory for lead (Pb) and arsenic (As) using USEPA Methods SW 846, 7420 and SW 846, 7060A, respectively. The laboratory analytical data sheets will state the minimum quantifiable level (MQL) for each constituent and the dilution factor for each sample.

3.4 Soil Leachability

For the purpose of evaluating soil leachability, additional samples will be collected at locations identified as T-4 50'N, T-4 50'S, T-4 50'E, T-5, T-5 50'N, T-5 50'E, T-7 100'E and T-9 100'W on the maps furnished by Covington and as shown on Figure 3 herein. If we are unable to field locate the flagging, stakes and/or field markings identifying these locations, Butler Services will attempt to re-establish the locations using the scaled map drawings furnished by Covington.

The analytical results of the previous sampling conducted by Covington during the limited Phase II Site Assessment indicated that the soil at the locations identified above contained high levels of lead (Pb) and arsenic (As). The subsurface soils at the identified locations will be re-sampled as a part of this Work Plan. Samples will be collected at the same sampling intervals bgs as the delineation soil samples and analyzed for total lead (Pb) and total arsenic (As). A total of five (5) soil samples will be selected for analyses of leachability, based upon the laboratory results of the delineation samples (Task 3.3) and additional sampling identified herein, at the locations and depths with the highest concentrations of total lead (Pb) and total arsenic (As).

The soil samples will be analyzed for total lead and total arsenic using USEPA Methods SW 846, 7420 and SW 846, 7060A, respectively and leachability using USEPA's Toxic Characteristic Leaching Procedure (TCLP).

BACKGROUND SAMPLES*

SAMPLE NO.	SAMPLE ID	SAMPLE STATUS
SAMPLE NO. 1	NW Corner	WORK PLAN SAMPLING
SAMPLE NO. 2	30N38	As 0.5 1.8
SAMPLE NO. 3	30N34	As 0.9 <0.1
SAMPLE NO. 4	30N35	As 0.6 0.8
SAMPLE NO. 5	30RC1	As 0.8 0.6
SAMPLE NO. 6	West Property Line	WORK PLAN SAMPLING
SAMPLE NO. 7	Near East Property Line	WORK PLAN SAMPLING
SAMPLE NO. 8	West Property Line	WORK PLAN SAMPLING
SAMPLE NO. 9	SW Corner	WORK PLAN SAMPLING
SAMPLE NO. 10	South Property Line	WORK PLAN SAMPLING
SAMPLE NO. 11	South Property Line	WORK PLAN SAMPLING
SAMPLE NO. 12	South Property Line	WORK PLAN SAMPLING

** Refer to attached diagram.*

TCLP SAMPLES*

SAMPLE NO.	SAMPLE ID	SAMPLE STATUS	
SAMPLE NO. 1	T-5 50'N	As 1310.0	Pb 4070.0
SAMPLE NO. 2	T-4 50'N	As 240.0	Pb 2810.0
SAMPLE NO. 3	T-5	As 108 309	Pb 135 @ 3' 5170 @ 3-5'
SAMPLE NO. 4	T-4 50'E	As 30.4	Pb 2580
SAMPLE NO. 5	T-4 100'E	As 132.0	Pb 6260.0
SAMPLE NO. 6	T-4 50'S	As 56.2	Pb 11000
SAMPLE NO. 7	T-7 100'E	As 198.0	Pb 1470
SAMPLE NO. 8	T-9 100'W	As 172.0	Pb 2880

* Refer to attached diagram.

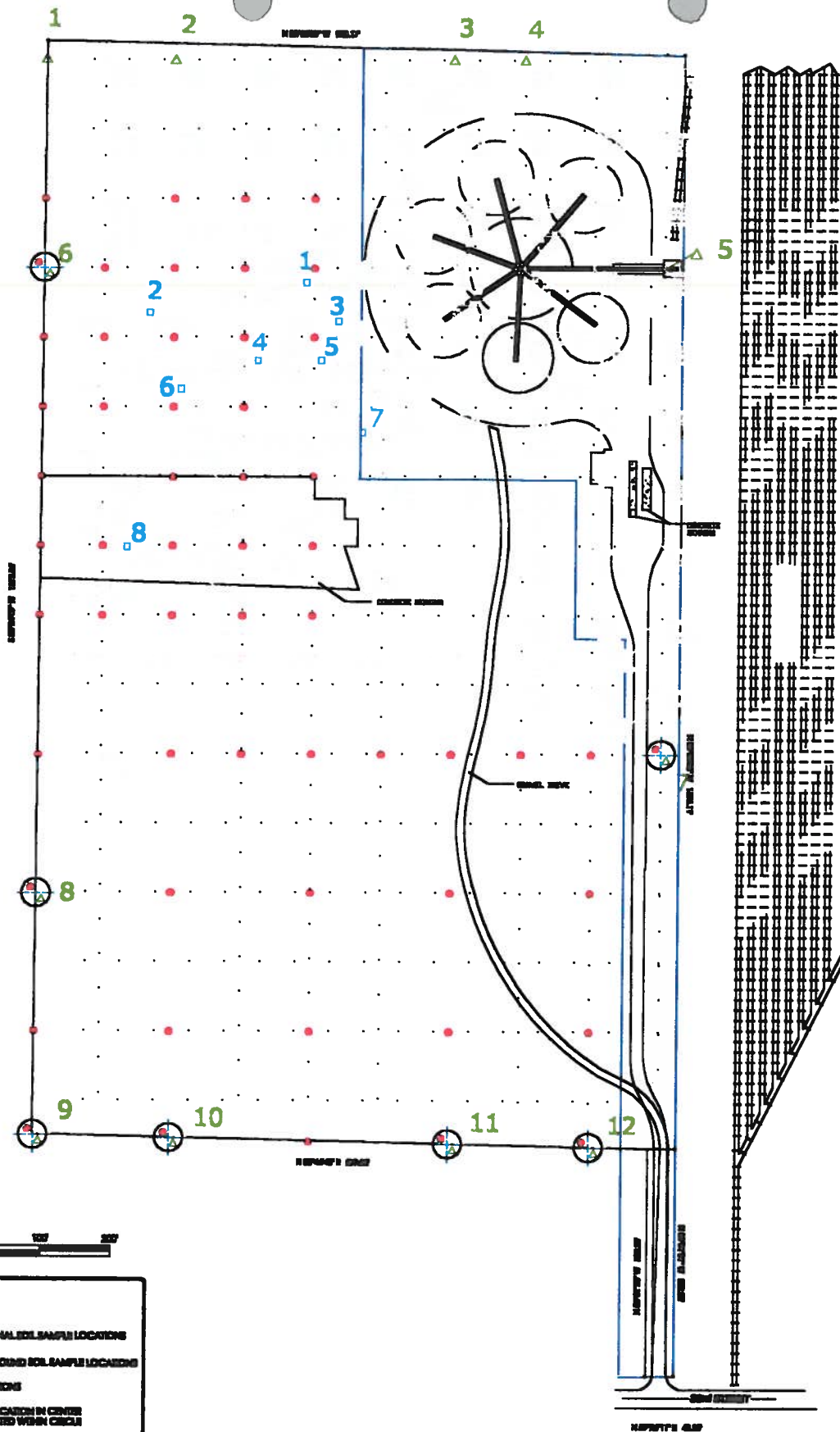
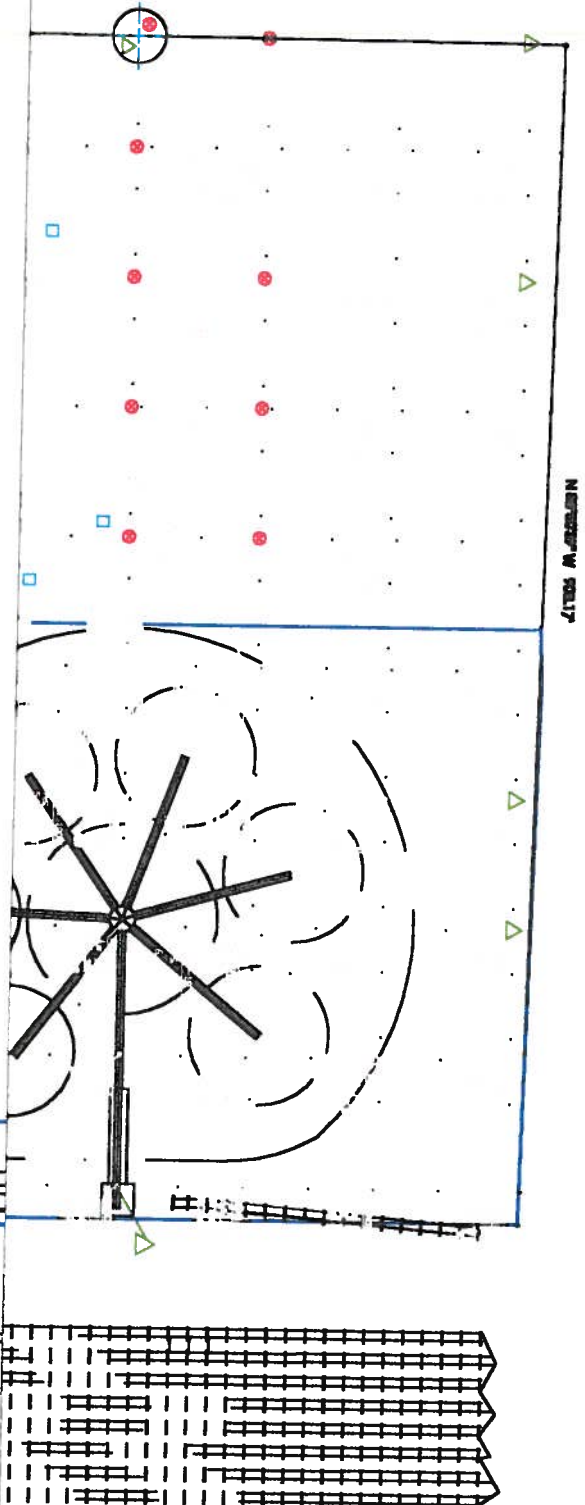
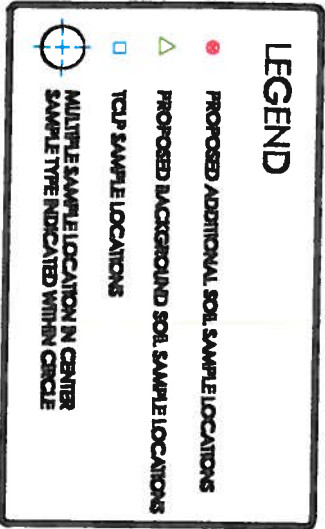


FIGURE NO. 3 WORK PLAN
PROPOSED SOIL SAMPLE LOCATIONS

DATE: 12/15/10
BY: J. L. Butler, P.E.
CHECKED: JLB
DATE: 12/15/10
APPROVED: JLB
SHEET 3

BUTLER SERVICES OF MS, INC.
Post Office Box 1184
PASCAGOULA, MS 39368
(601) 792-8228 Fax 792-1210 E-Mail: BUTLER@BOSM.COM

FIGURE NO. 3 WORK PLAN
PROPOSED SOIL SAMPLE LOCATIONS



DATE: 6/12/06	BY: J. D. BAKER, P.E.
DATE: APR	BY: J. D. BAKER, P.E.
DATE: MAY	BY: J. D. BAKER, P.E.
DATE: JUN	BY: J. D. BAKER, P.E.
DATE: JUL	BY: J. D. BAKER, P.E.
DATE: AUG	BY: J. D. BAKER, P.E.
DATE: SEP	BY: J. D. BAKER, P.E.
DATE: OCT	BY: J. D. BAKER, P.E.
DATE: NOV	BY: J. D. BAKER, P.E.
DATE: DEC	BY: J. D. BAKER, P.E.

BUTLER SERVICES OF MS, INC.
 Post Office Box 1164
 PASCAGOULA, MS 39568
 (886) 768-6803 Fax 768-1819 E-Mail BUTLERMS@AOL.COM



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PS*
DATE: June 14, 1999
SUBJECT: Meeting Memo

On the above date I met with Ms. Trudy Fisher of Brunini, Grantham, Grower, and Hewes to discuss the revised locations for TCLP sample and background sample collection at the Gulfport Fertilizer Site. The faxed copy of the map was hard to read, but the new locations appear to be appropriate. I told her I would have to wait until the map was formally submitted and could be rechecked to be certain that the locations are appropriate. I also explained to her that if any of the background samples come back with elevated concentrations that those samples would be considered outliers and would not be included in the statistical calculation of the background arsenic concentration.

Ms. Fisher and I also discussed the letter sent by Ms. Joy Phillips of Hancock Bank dated June 10, 1999, confirming the details of our telephone conversation on June 9, 1999. I was concerned about two statements in the letter. The first statement has to do with MDEQ requiring them to go back and take TCLP samples from the hottest spots. I wanted to be sure that they understand that they are not going back and repeating work that has already been done. The second statement deals with Hancock Bank's concern that heavy background sampling on the south end of the site may not be a fair representation of the site. I wanted to be sure that they understand that the purpose of the background sampling is to determine the naturally occurring concentration of arsenic at the site when it was in its pristine state, not after it had been impacted by the production of super phosphate fertilizer.

Ms. Fisher said she would contact Ms. Phillips regarding the statements in the letter and the formal submission of the revised map.

C:\MyFiles\Gulfport Fertilizer\Meeting Memo 6-14-99 (pj).wpd

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289-0385 Phone 601.961.5171 Fax 601.354.6612

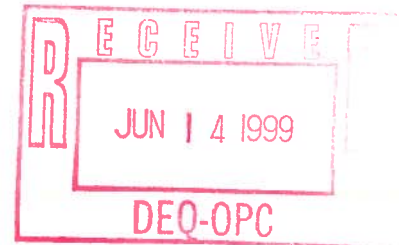


**HANCOCK
BANK**

JOY LAMBERT PHILLIPS
General Counsel

June 10, 1999

Via Facsimile and Mail



Penelope "Penny" Johnston
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289.385

RE: Gulfport Fertilizer Plant
File No: 99.117

Dear Ms. Johnston:

This letter is to confirm our telephone conversation of Wednesday, June 9, 1999, as well as the conversation you had with Denton Bates on June 7, 1999. We want to be sure that we are providing all of the information you have requested to supplement the reports of May 5, and June 3, 1999. You had initially required that we respond by Friday, June 11, 1999 but indicated in our telephone conversation that if we needed additional time it would not be a problem. We appreciate your consideration in this matter.

You have requested that we go back and take Toxicity Characteristic Leaching Procedure (TCLP) samples from the hottest spots. Since we may not be able to identify the hottest spots from previous reports, Butler Services had proposed that we do TCLPs on the five hottest samples taken from the 114 samples we had already planned to take. You indicated that you discussed this with Tony Russell and you both liked this approach and would approve it, but you requested that we also attempt to relocate the hottest spots shown on previous reports and collect samples in those areas for purposes of TCLP analysis.

The other issue you needed further information on was the background sampling. You indicated that our plan for background testing needed to be revised. In our telephone conversation you referenced the EPA guidelines and explained to Hancock Bank personnel that those guidelines indicate from where samples should be taken and from where they cannot be taken. You stated that we should be sampling primarily from the perimeters of the property, with an emphasis on the southern portion of the property. You also stated that you wanted to see us space

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228-868-4445 / Fax 228-868-4496 / 1-800-522-6542



June 10, 1999

Page -2-

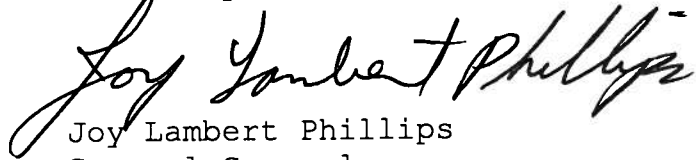
further apart the three (3) sample locations on the west side perimeter. You indicated that while six to eight background samples are considered acceptable, you would like to see eight, which is in accordance with the number Butler Services has proposed taking.

Finally you stated that to sample on the northern end of the property was probably a waste of our time and money, but you did indicate that on the northern perimeter we could probably use the low data points from the previous sampling done.

As Denton Bates indicated to you previously, this is a large site and heavy sampling on the south end may not be a fair representation of the site, which as we understand it, is why Butler Services had proposed doing some sampling on the northern perimeter, where there is no evidence of plant operation. Nevertheless, we will comply with your request that the samples be weighted to the south.

It is our understanding that we do not need to resubmit the entire proposal, only those sections and the sample location map (Figure 3) dealing with these issues. Again, thank you for all of your assistance, advice and cooperation on this matter. Please call if this letter is not an accurate summary of the various telephone conversations or if I have misstated or omitted anything. The supplemental information itself will be forwarded separately.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joy Lambert Phillips". The signature is fluid and cursive, with the first name "Joy" being particularly prominent.

Joy Lambert Phillips
General Counsel

JLP/cjp

cc: Trudy Fisher, Esquire
Butler Services
Charlie Webb
Andy Alfonso

FILE COPY

HANCOCK BANK LEGAL OFFICE
FACSIMILE TRANSMITTAL SHEET

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS
LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY
FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED BELOW.

IF YOU HAVE RECEIVED THIS TELECOPY IN ERROR, PLEASE
IMMEDIATELY NOTIFY US BY TELEPHONE. THANK YOU.

DATED: June 11, 1999

TO: Penny Johnston

TELECOPIER NUMBER: 601-961-5300

FROM: Joy Lambert Phillips, Esquire
FAX (228) 868-4496

Number of Pages Transmitting: 3 (Including cover page)

If you do not receive the number of pages
specified above, or if there are any other
problems with this transmission, please
contact Jennifer Rahrer at 228-868-4445.

Comments:

This is the letter regarding our telephone conversation and your
Conversation with Denton Bates on Wednesday, June 9, 1999.

If you have any questions, please feel free to call me.

Thanks

Joy

**HANCOCK
BANK**JOY LAMBERT PHILLIPS
General Counsel

June 10, 1999

Via Facsimile and Mail

Penelope "Penny" Johnston
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289.385

RE: Gulfport Fertilizer Plant
File No: 99.117

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June 10, 1999

Page -2-

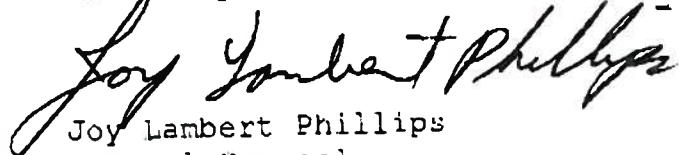
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It is our understanding that we do not need to resubmit the entire proposal, only those sections and the sample location map (Figure 3) dealing with these issues. Again, thank you for all of your assistance, advice and cooperation on this matter. Please call if this letter is not an accurate summary of the various telephone conversations or if I have misstated or omitted anything. The supplemental information itself will be forwarded separately.

Sincerely,



Joy Lambert Phillips
General Counsel

JLP/cjp

cc: Trudy Fisher, Esquire
Butler Services
Charlie Webb
Andy Alfonso




MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston 
DATE: June 9, 1999
SUBJECT: Phone Conference

On the above date, the attached list of individuals conducted a conference call regarding the Revised Site Characterization Work Plan dated June 3, 1999, submitted by Butler Services on behalf of Hancock Bank. The first issue discussed was the proposed TCLP sample locations. I stated that MDEQ concurs with the use of the five (5) most contaminated samples of the 114 samples to be collected during the next sampling event for their TCLP samples, but that MDEQ would also like to have TCLP samples collected from the areas of highest known contamination. They stated their concern that they may not be able to locate the exact areas where the original samples were collected. I told them to do their best to locate the areas and to collect totals samples from these areas also and run them first. If the samples are not contaminated then they may discard the TCLP sample.

The second issue discussed was the proposed background sample locations. I explained to them that background samples are to be collected in areas in which the soils would not have been impacted by the operations of the facility. I told them that MDEQ would like to see the background samples collected randomly around the perimeter of the site, staying away from known or suspected hot spots. I also explained to them that some of the perimeter data we have from previous investigations show total arsenic levels ranging from <0.1 - 1.5 mg/kg and that they may include this data in their calculation of the background arsenic level for the site.

The third issue discussed was the possibility of conducting a naturally occurring radioactive materials (NORM) survey at the site. This issue was raised in the Phase I Environmental Site Assessment dated June 12, 1995, conducted by Covington and Associates Corporation on behalf of Hancock Bank. The bank was not sure

Gulfport Fertilizer Site - Phone Conference Memo
June 9, 1999
Page 2

whether or not this issue had been addressed. They said they would check into it. I told them that if a NORM survey had not been done for the site that one would need to be done.

The bank stated their concern that they may not be able to meet the deadline of June 11, 1999, for the re submittal of the work plan. I told them I would be willing to extend the deadline a few days. Joy Phillips is going to fax me a copy of their meeting notes to ensure that Hancock Bank understands what MDEQ wants to see in the second revision of the work plan.

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Mississippi Department of Environmental Quality
Phone Conference Participants List

Date June 9, 1999

Company or Site Gulfport Fertilizer Site

Location of Site Gulfport, Mississippi

Participant	Company	Email Address	Phone Number
Penny Johnston	MDEQ	Penelope_Johnston@deq.state.ms.us	(601) 961-5388
Trudy Fisher	Brunini, Grantham, Grower, & Hewes, PLLC		(601) 948-3101
Leo Seal, Preident	Hancock Bank		(228) 868-4361
Charles Webb, Executive Vice President	Hancock Bank		228) 868-4361
Andy Alfonso, Vice President	Hancock Bank		228) 868-4361
Joy Phillips, Legal Council	Hancock Bank		228) 868-4361
Louis Fortenberry	Butler Services	BUTLERMS@AOL.com	(228) 769-6982
Denton Bates	Butler Services	BUTLERMS@AOL.com	(228) 769-6982



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

FILE COPY

MEMORANDUM

TO:	Gulfport Fertilizer Site File
FROM:	Penelope Johnston <i>PJ</i>
DATE:	June 9, 1999
SUBJECT:	Phone Conversation

On June 7, 1999, I spoke with Mr. Denton Bates of Butler Services regarding the Revised Site Characterization Work Plan dated June 3, 1999, submitted by Butler Services on behalf of Hancock Bank. I explained to him that the proposed locations of the background samples were still inappropriate. I told him that they would have until June 11, 1999, to submit something that MDEQ could work with or MDEQ will establish the background level for arsenic for the site.

Mr. Bates and I also discussed the proposed locations for the TCLP samples. He stated that they would like to have the five (5) most contaminated samples of the 114 samples to be collected during the next sampling event analyzed for TCLP. I told him that would be fine, but that MDEQ would still like to have TCLP samples collected from the areas of highest known contamination (from areas where we already have data).

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HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

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No. 018617

HANCOCK BANK \$1,650dols00cts

DATE

AMOUNT

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TO THE
ORDER
OF:

MISSISSIPPI DEPT. OF ENVIRONMENTAL
QUALITY

06/03/99

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⑈0186173⑈ ⑆065503681⑆ 01 0129100⑈

George A. Schlager

FILE COPY



Dony Russell



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PS*
DATE: June 7, 1999
SUBJECT: Phone Conversation

On June 4, 1999, I spoke with Mr. Andy Alfonso of Hancock Bank. I told Mr. Alfonso that Butler Services had submitted the revised work plan requested by MDEQ by letter dated May 20, 1999. I explained to him that the proposed locations of the background samples were still inappropriate. I told him that Butler Services would have until June 11, 1999, to submit something that MDEQ could work with or MDEQ will establish the background level for arsenic for the site.

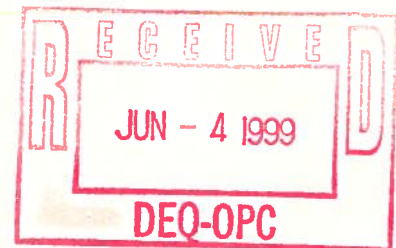
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Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

June 3, 1999

Mr. Tony Russell, Chief
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

FILE COPY



ATTN: Ms. Penelope Johnston, Project Officer

RE: Revised Site Characterization Work Plan
Gulfport Fertilizer Plant, 33rd Street, Gulfport, Mississippi

Dear Tony:

We are transmitting herewith our revised work plan pursuant to the comments contained in your letter of May 17, 1999. The proposed locations for the collection of background samples have been revised and are shown on Figure 3 of the work plan.

A copy of the Phase I Environmental Assessment Report written by Covington & Associates Corporation (Covington) and the chain of custody forms (items 8 & 9) mentioned in your letter were previously transmitted to your office under separate cover. The water sample collected from the monitoring well identified on the Covington map, as MW-1 is included on the chain of custody sheet. However, as we mentioned in our previous meeting in your office this sample was collected initially to give us an indication of the potential contamination when we were asked to look at this project on behalf of the Hancock Bank for proposal purposes. Further, at the time this sample was collected we did not have any information regarding the well construction details. The well was not purged and therefore it should not be considered as representative of the formation. The temperature, pH and conductivity of the formation were not recorded on our standard field form.

If you should have any questions or require any additional information, please do not hesitate to contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely yours,

BUTLER SERVICES OF MISSISSIPPI, INC.

A handwritten signature in dark ink, appearing to read "William D. Bates".

William D. Bates, P.E.
Project Manager

WDB:b

Attachments: Site Characterization Work, Revised June 3, 1999

cc: Mr. Charles E. Webb, Executive Vice President, The Hancock Bank w/ attachments

Post Office Box 1164 • Pascagoula, MS 39568-1164 • (228) 769-6983
800-264-6711 • Fax (228) 769-1219 • E-Mail ButlerMS@AOL.COM

**WORK PLAN
SITE CHARACTERIZATION REPORT
FORMER GULFPORT FERTILIZER PLANT SITE
33RD STREET
GULFPORT, MISSISSIPPI**

**PREPARED
FOR
THE HANCOCK BANK
COMMERCIAL LOAN DEPARTMENT
2510 14TH STREET
GULFPORT, MS 39501**

**PREPARED BY
BUTLER SERVICES OF MISSISSIPPI, INC.
PO Box 1164
PASCAGOULA, MISSISSIPPI 39568-1164
(228) 769-6983**

**May 1999
(Revised June 3, 1999)**

TABLE OF CONTENTS

	<u>Page No.</u>
1.0 BACKGROUND	
1.1 SAMPLING RATIONAL	1
1.2 PREVIOUS INVESTIGATIONS	
2.0 OBJECTIVES	2
3.0 INVESTIGATIVE ACTIVITIES	3
3.1 SITE RECONNAISSANCE & GRID MARKING	3
3.2 DETERMINATION OF ARSENIC BACKGROUND CONCENTRATIONS	4
3.3 SUBSURFACE SOIL DETERMINATION	4
3.4 SOIL LEACHABILITY	5
3.5 GROUNDWATER SAMPLING	7
4.0 HEALTH AND SAFETY	7
5.0 SITE CHARACTERIZATION REPORT	8
	8

FIGURES

Figure 1 – Site Location/Vicinity Map

Figure 2 – Site Map

Figure 3 – Proposed Soil Sample Location

**SITE CHARACTERIZATION
WORK PLAN
FORMER GULFPORT FERTILIZER PLANT
GULFPORT, MISSISSIPPI**

1.0 BACKGROUND

The subject property is an approximate 33.06-acre parcel of land located on 33rd Street approximately one block west of its intersection with State Highway 49 in Gulfport, Mississippi. The Gulfport Fertilizer Company, which closed for business in circa 1960, was formerly located on the subject property. The fertilizer company reportedly manufactured superphosphate fertilizer. Improvements to the land once consisted of concrete buildings, surfaced roads and railroad spurs, but the improvements have been largely destroyed.

1.1 Sampling Rational.

Background information contained in the Phase I Environmental Assessment conducted by Covington & Associates, Inc. (Covington) and reviewed by Butler Services of Mississippi, Inc. (Butler Services) revealed that the subject site was used predominately for the production of phosphate fertilizer. There was no evidence of activities that would generate hazardous substances from the other operations that were briefly located at the site over the fifty or so years the site was utilized for industrial and manufacturing purposes other than the phosphate fertilizer operations. Further, samples collected by Covington as a part of a limited Phase II Environmental Assessment of a portion of the site were analyzed for metals, volatiles, semi-volatiles and pesticides. The constituents of concern identified with elevated levels in the soils were lead and arsenic.

Butler Services obtained additional information regarding the composition of phosphate rock used in fertilizer plant operations from a local manufacturer. When the phosphate fertilizer plant was in operation the type of phosphate commonly manufactured at that time was normal super-phosphate. Normal super-phosphate is manufactured by introducing sulfuric acid to phosphate rock (tri-calcium-phosphate). Typically, the phosphorous pentoxide, referred to as P2O5, and calcium oxide content of the rock used in production at the time the plant was operating was about 33% and 48%, respectively. The remainder of the constituents in the phosphate rock consisted of lead and arsenic as well as a low percentage of other compounds such as aluminum,

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

iron, carbon dioxide, fluorine and miscellaneous trace elements. Hence, based upon the foregoing, lead and arsenic were identified as the constituents of concern.

1.2 Previous Investigations.

A subsurface investigation was conducted by Covington for a potential purchaser in May and June of 1998. The investigation focused on an area approximately 720 feet (ft.) by 720 ft. in the northern half of the 33.06-acre parcel. Exploratory soil pits and two 4-inch diameter monitoring wells were installed during this investigation. The results of soil samples collected by Covington at the site indicated that elevated levels of lead (ranging up to 11,000 milligrams per kilogram (mg/kg)) and arsenic (ranging up to 1,310 mg/kg) contamination exists in the subsurface soils. Contamination at low levels was shown to exist in the groundwater, as well

On September 30 and October 1, 1998, Butler Services performed soil and groundwater sampling using direct push probes and groundwater sampler as manufactured by Geoprobe. The primary purpose of this subsurface investigation was to characterize a 7.9-acre portion of the subject property along the eastern boundary. The results of the soil samples collected within the 7.9 acre parcel indicated lead and arsenic levels in subsurface soils ranging from less than 0.1 mg/kg to 306 mg/kg and from less than 0.1 mg/kg to 10.2 mg/kg, respectively with the exception of two distinct areas. One of the areas with subsurface soil contamination is located adjacent to the former railroad spur, approximately 800 feet south of the northeast corner of the subject property. The second area with subsurface soils that contained elevated levels of arsenic only is located 400 ft. south and 300 ft. west of the northeast corner of the subject property. Additional soil sampling was conducted in an isolated area adjacent to the former railroad spur on October 21, 1998 and February 12, 1999. The analytical results from this additional sampling indicate that lead contamination exceeding 400 mg/kg and arsenic contamination exceeding 15 mg/kg are confined to the property in an area approximately 20 ft by 20 ft. Lead and Arsenic levels in the groundwater samples collected along the eastern property boundary and western perimeter of the 7.9 acre parcel were all less than the laboratory detection limits of 0.005 milligrams per liter (mg/l) with the exception of samples collected in an area near the former railroad spur. The samples in this isolated area correlate with the elevated levels found in the soil in this same area.

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

Iso-concentration maps were prepared utilizing the analytical results from the Butler Services and Covington investigations. The source areas from the maps appear to be located in an area in the northern half of the property that was identified in the aerial photographs and background information in the Phase I Environmental Assessment. This area is located where the primary fertilizer plant operations were centered.

2.0 OBJECTIVES

The objectives of this phase of the work is to (1) delineate the extent of subsurface contamination in the soils of the remainder of the approximate 33 acre subject property; (2) develop background concentration levels for determining action levels, and (3) collect soil samples in the southern half of the subject property to mitigate any future questions as to the levels of constituents in this area. Discreet soil samples will be collected at depths in the source areas to supplement the exploratory pit and composite surface samples collected by Covington. The purpose of the discreet samples is to better define the horizontal and vertical extent of contamination in the source areas.

The Mississippi Department of Environmental Quality (MDEQ) will be notified a minimum of two (2) weeks prior to conducting any field work or sampling event. The MDEQ will be provided the opportunity to observe field work and collect split samples. Butler Services will provide MDEQ with the appropriate sample containers and preservatives should MDEQ request split samples.

3.0 INVESTIGATIVE ACTIVITIES

The investigative activities to be conducted on the remainder of the 33-acre site for delineating the extent of subsurface soil contamination on the subject property are outlined hereinafter. These work plan investigative activities include the collection of subsurface soil samples and the re-sampling of groundwater monitoring wells. Groundwater from the monitoring wells installed during the limited Phase II Environmental Assessment conducted by Covington was found to contain low levels of lead (Pb), Arsenic (As) and Chromium (Cr) contamination and will be re-sampled as a part of the work plan activities. Soil and groundwater sampling will be in general accordance with the procedures outlined in USEPA, Region IV's "Environmental Investigations Standard Operating Procedures and Quality Assurance Manual" (EISOPQAM).

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

3.1 Site Reconnaissance & Grid Marking

Prior to initiating, subsurface drilling activities Mississippi One Call System, Inc. will be contacted to mark the location of any gas, water, and sewer or buried electrical lines at the site. Traffic cones and caution tape will be used as necessary to restrict traffic into work areas. No permit requirements are anticipated for use of the direct-push equipment during the investigation.

The areas to be investigated will be measured and staked in a grid pattern. A 100-foot horizontal grid for sampling will be extended from the east to the west in the area of the former plant operations on the northern half of the property. In addition, 200-foot grid pattern will be extended east to the west to the southern property line of the subject property. Although, there has been no evidence developed to date that any significant industrial/manufacturing activities occurred in the southern portion of the subject property, Butler has been requested to collect soil samples in this area to mitigate any future questions as to the levels of constituents in this area. The proposed soil sampling locations are identified in "Work Plan Proposed Soil Sample Locations," Figure No. 3. Flags will be placed at the specific grid points to mark where soil borings are to be advanced.

3.2 Determination of Arsenic Background Concentrations.

It is proposed that six (6) to eight (8) random background soil samples be collected to establish background concentrations of arsenic (As) in the native soils resulting from naturally occurring or anthropogenic sources. Pursuant to MDEQ requirements, the background samples will be collected from the same sampling intervals, 2-feet and 4-feet, as the investigative soil samples. Background samples will be taken from areas outside of suspected hazardous waste activities identified in the Phase I Environmental Assessment and/or source areas delineated on the Iso-concentration maps prepared from previous subsurface sampling activities on the subject property. The type(s) of soil underlying the site and their characteristics were also considered in selecting the background samples for analyses. The proposed locations are shown on Figure 3.

The three distinctive soil types within the boundaries of the subject property are the Harleston, Atmore, and Plummer series according to soil survey information available from the Natural Resources Conservation Service, Soil Series Survey. The predominate soil type underlying 90 to

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

95 percent (%) of the subject property is the Harleston series. The Atmore and the Plummer soil types are located along the eastern and northern property boundary, respectively.

The Harleston series, a non-hydric soil type, is a yellowish-brown to pale-brown loamy sand overlain by 0 to 8-inches of very dark grayish brown loamy sand. These soil characteristics were observed during the subsurface investigation of the 7.9-acre portion of the subject property conducted by Butler. These soil characteristics were noted down to the water-bearing zone, which was encountered approximately 4-feet below ground surface at the site. The background soil samples will be collected from the Harleston soil type only since it is the predominate soil type that underlies the suspected areas of the fertilizer plant activities.

The background soil samples will be analyzed for arsenic using United States Environmental Protection Agency (USEPA) Method SW 846, 7060A and/or Method SW 846, 6010A-ICP. This soil data will then be used to develop background limits based on guidance from USEPA Engineering Forum Issue: "*Determination of Background Concentrations of Inorganics in Soils and Sediments at Hazardous Waste Sites*", December 1995.

Subsurface Soil Delineation

The subsurface investigation in the area of the former plant activities will include advancing 37 direct-push probes with a soil-probing machine, as manufactured by Geoprobe, to further delineate the extent of soil contamination in this area. The Geoprobe is a vehicle mounted hydraulically powered soil probing machine that uses static force and percussion to advance sampling tools into the subsurface to collect soil, groundwater or vapor samples.

Although, there has been no evidence developed to date to indicate that any significant industrial/manufacturing activities occurred on the southern one-half of the property. Butler has been requested to collect soil samples to mitigate any future questions as to the levels of constituents in this area. It is anticipated that 20 direct-push probes will be advanced by Geoprobe on a 200-foot grid in the southern portion of the subject property.

The soil borings in the areas noted above will be advanced using Geoprobe's Macro-core soil sampler, a 48-inch long by 2-inch diameter soil sampler capable of recovering a sample that

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

measures up to 1300 ml in volume in the form of a 46-inch x 1.5-inch core. A releasable probe point will be attached to the bottom of the sampling tube to prevent soil from entering the tube until the sampling depth is reached. The sampler will be pushed into the soil with connected 4-foot long hollow probe rods. Once the sample depth is reached the point will be released and the sampling tube will be driven into undisturbed soil. Soil samples will be collected using new clear PVC sample collection liners that are approximately 46-inch long by 1.75-inches in diameter. Soil samples collected will be logged at two-foot intervals to a suspected maximum depth of five feet below ground surface (bgs) or until groundwater is encountered, whichever occurs first. It is anticipated that groundwater will be encountered less than five feet bgs. After samples had been collected from the soil cores, the remaining soil will be drummed and characterized for disposal in a permitted facility. The boring will then be sealed to the ground surface with Bentonite.

The sampler and sample tubes will be cleaned using tap water and Liquinox. A brush will be used, if necessary, to remove particulate matter and surface films during cleaning. The equipment will then triple rinsed thoroughly with tap water, analyte free water and pesticide-grade isopropanol followed by a final rinse of analyte free water only. If analyte free water is not available, the equipment will be allowed to air dry following the solvent rinse. A solvent rinse will not be applied to PVC items or plastic items. Once the equipment has been cleaned it will be removed from the decontamination area and covered with aluminum foil when not in use. Equipment to be stored overnight will be wrapped in aluminum foil and covered with clean, unused plastic. The rinsate will be containerized and transferred to drums for characterization and disposal off-site in a permitted facility.

It is estimated that a total of 114 soil samples will be collected for independent laboratory analysis. As a part of the field Quality Assurance and Quality Control (QA/QC) program, replicate samples at a rate of 5 percent for each matrix and a daily equipment field blank sample will be prepared similarly for delivery to the laboratory. The samples will be transferred to new laboratory furnished, glass sample jars, sealed with a teflon-lined cap and labeled. The samples will then be placed into plastic zip-lock bags and delivered to Micro Methods Laboratory in Ocean Springs, Mississippi in a chilled condition for analyses. A chain-of-custody will be maintained to trace sample custody.

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

The soil samples will be analyzed by the laboratory for lead (Pb) and arsenic (As) using USEPA Methods SW 846, 7420 and SW 846, 7060A, respectively. The laboratory analytical data sheets will state the minimum quantifiable level (MQL) for each constituent and the dilution factor for each sample.

3.4 Soil Leachability

Five (5) soil samples will be selected for analyses of leachability based upon the laboratory results of the delineation samples at the locations and depths with the highest concentrations of lead (Pb) and arsenic (As). Proposed locations for soil leachability analyses based on the source areas identified on the iso-concentration maps, developed as a part of the 7.9 acre site characterization, are shown on Figure 3.

The soil samples will be analyzed for total lead and total arsenic using USEPA Methods SW 846, 7420 and SW 846, 7060A, respectively and leachability using USEPA's Toxic Characteristic Leaching Procedure (TCLP).

3.5 Groundwater Sampling

The two (2) monitoring wells installed by Covington as a part of a limited Phase II Environmental Assessment of a portion of the site, identified on the drawings as MW-1 and MW-2, will be re-sampled as a part of this work plan. The wells will be purged and sampled in general accordance with the procedures outlined in USEPA, Region IV's "*Environmental Investigations Standard Operating Procedures and Quality Assurance Manual*" (EISOPQAM). If the groundwater is found to be contaminated a work plan will be prepared for the delineation of the vertical and horizontal extent of contamination. The work plan will be submitted to MDEQ for review and approval prior to initiating any further groundwater assessment activities.

A licensed land surveyor will survey the wells in to a benchmark of known elevation above mean sea level. The depth to groundwater will also be measured in each well using a Solinst water level meter or equivalent, originating at a specific point on the well casing prior to collecting groundwater samples.

SITE CHARACTERIZATION WORK PLAN FORMER GULFPORT FERTILIZER PLANT

The wells will be purged using a slow purge method. Sampling will be performed after each well has achieved at least 80 per cent (%) recharge; the temperature, pH and conductivity of the groundwater has stabilized as indicated by three consecutive Hydac or equivalent instrument readings within 10 % and the water is free of suspended and settleable matter. A new disposable bailer will be used to collect the groundwater sample from each well. The bailed water from each well will be transferred into new 1 liter, laboratory furnished and nitric acid preserved, plastic sample containers. As a part of the field QA/QC program, a field equipment blank sample will be prepared similarly for delivery to the laboratory. As each sample is collected, it will then be stored in a chilled ice chest for delivery to Micro Methods Laboratory in Ocean Springs, Mississippi for analyses. A chain-of-custody will be maintained to trace sample custody.

The laboratory will analyze the samples for lead (Pb), arsenic (As), and chromium (Cr) using USEPA Methods 239.2, 206.2 and 218.2, respectively. The laboratory analytical data sheets will state the minimum quantifiable level (MQL) for each constituent.

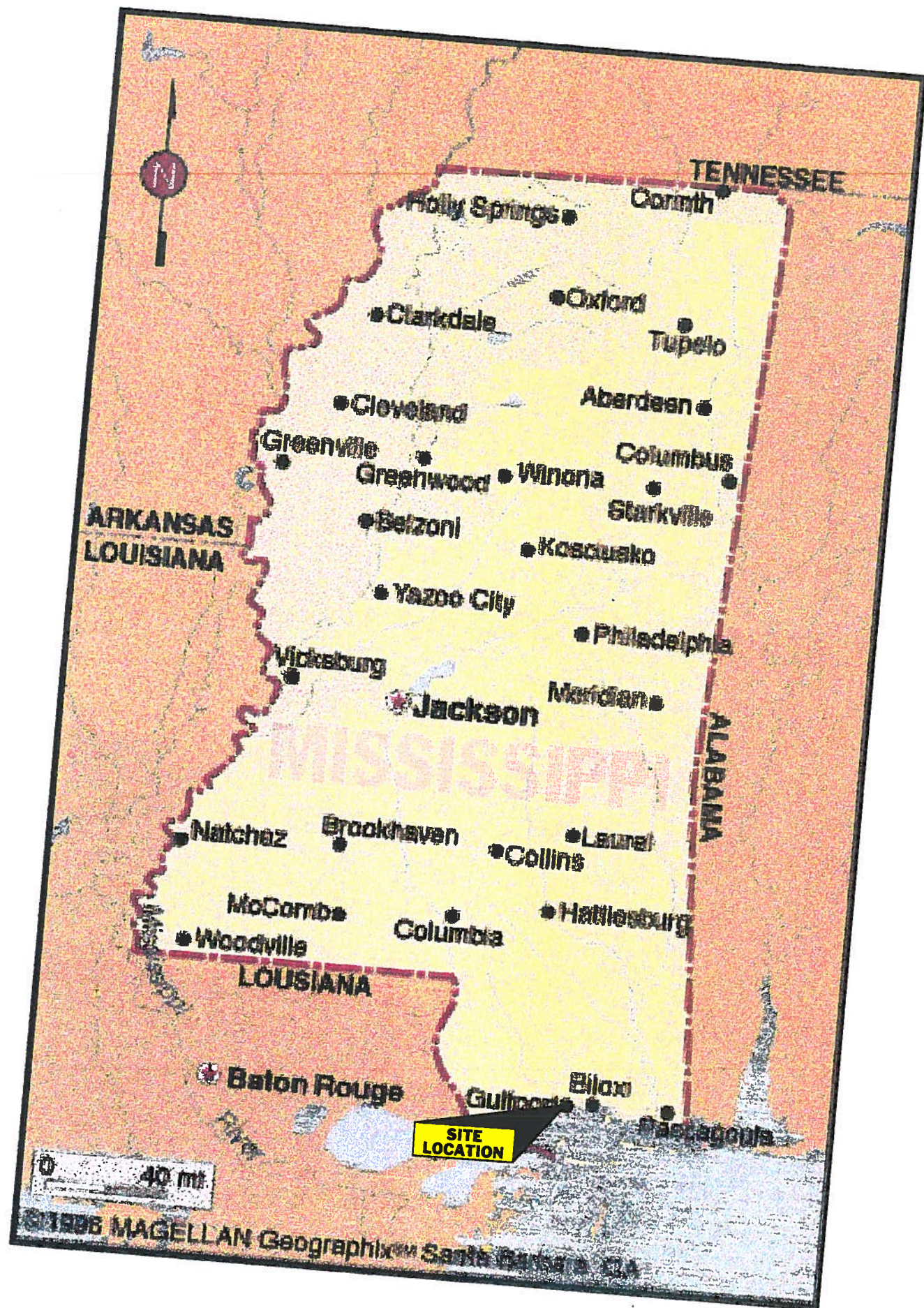
3.0 HEALTH AND SAFETY

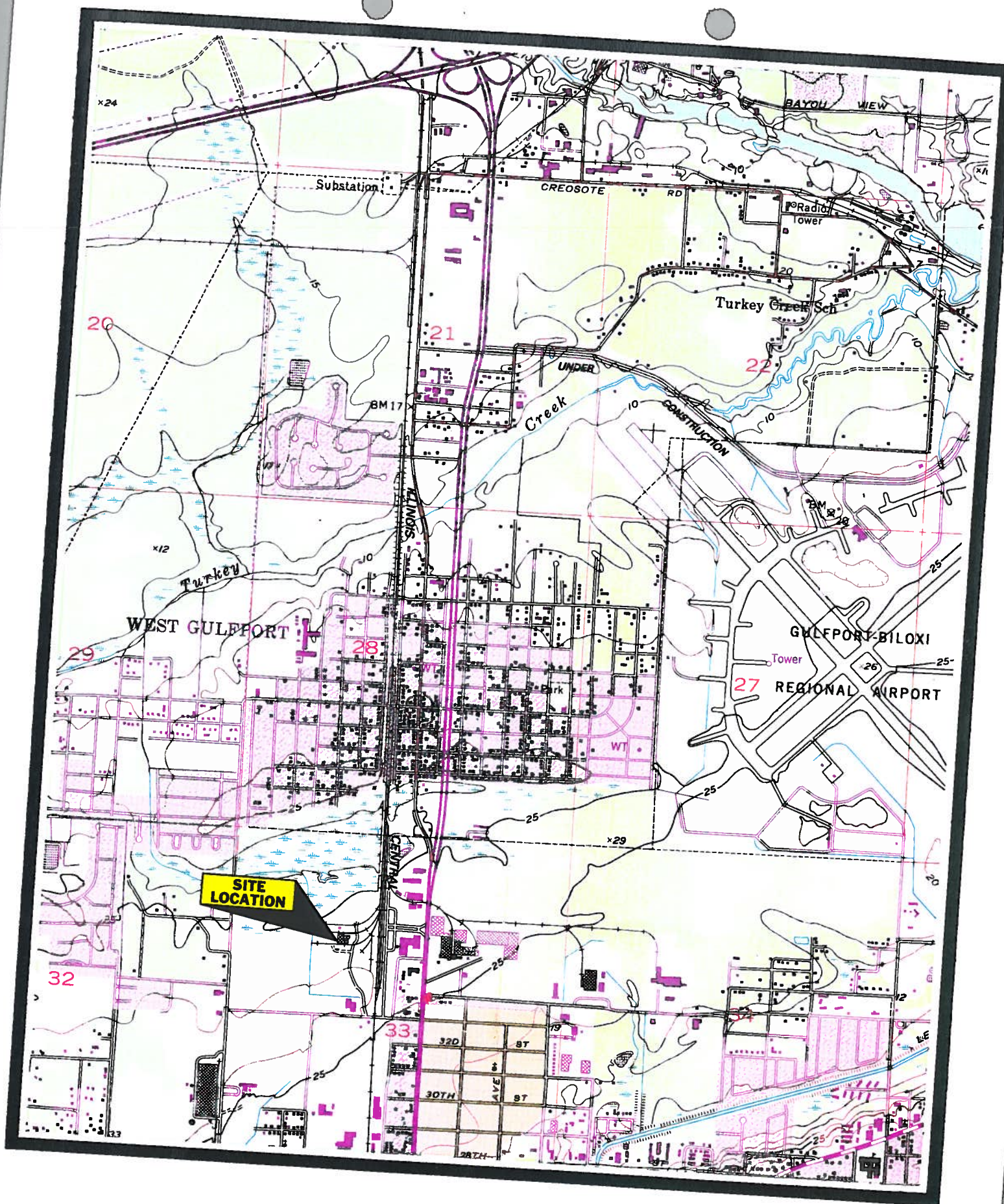
The field sampling work will be performed under a written Health and Safety Plan (HASP) prepared by Butler Services. A Health and Safety meeting will be held at the site with the Geoprobe subcontractor and Butler personnel prior to initiating any site activities. A Site Safety Officer will be designated to see that the work is performed according to the HASP.

4.0 SITE CHARACTERIZATION REPORT

After completion of site activities and receipt of laboratory data and analyses, Butler Services will prepare a Site Characterization Report. The report will include a summary of the work that was conducted, the procedures that were used, pertinent findings, conclusions regarding the extent of contamination present at the site, and recommendations for further assessment work, if warranted.

The Site Characterization Report will be submitted to the MDEQ within sixty (60) days after completion of field activities and receipt of laboratory data and analyses.







LEGEND

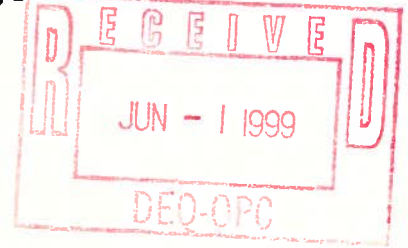
- PROPOSED ADDITIONAL SOIL SAMPLE LOCATIONS
- PROPOSED BACKGROUND SOIL SAMPLE LOCATIONS
- TCEP SAMPLE LOCATIONS

**FIGURE NO. 3 WORK PLAN
PROPOSED SOIL SAMPLE LOCATIONS**

DATE: 8/5/99	BY: 1	Q 1
APPROVED BY: D. BUTLER, P.E.	1	
DATE: AVE		
CHIEF: MC		
APPROVED BY: TCEP		
DATE: A		

BUTLER SERVICES OF MS, INC.
 Post Office Box 1164
 PASCAGOULA, MS 39568
 (228) 769-6863 Fax 769-1819 E-Mail BUTLERMS@AOL.COM

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -



May 27, 1999

FILE COPY

Tony Russell, Chief Uncontrolled Sites
Mississippi Department Of Environmental Quality
Mississippi Office Of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Dear Mr Russell,

This is in response to your letter of May 20th 1999 to Mr Andy Alphonso requesting a copy of the Phase I Report by Covington & Associates on the Gulfport Fertilizer plant site. We did not have a copy only excerpts until the bank forwarded a copy. Also enclosed is a chain of custody document requested. The other items will be addressed and forwarded to you by June 7th 1999.

Sincerely

A handwritten signature in dark ink, appearing to read 'W.D. Bates'.

W.D. Bates, P.E.
Project Manager

Butler Services of Mississippi, Inc.

Post Office Box 1164 • Pascagoula, Mississippi
Telephone (601) 769-6983

Analysis Request and Chain of Custody Record

Page _____ of _____

Company BUTLER SERVICES		Address PASCAGOULA		Contact L. W. FORTENBERRY		Client/Project Name HANCOCK BANK / 33 RD STREET	
Sample submitted by: A. D. BATES		Telephone 769-7693		Project Location 33 RD STREET		Project No. 98631	

Field Sample No./ Identification	Date and Time	Sample Container (Size/Mat'l)	Sample Type (Liquid, Soil, Sludge, Etc.)	Preservative	ANALYSIS REQUESTED		REMARKS
					TEST	METHOD	
75-50	7/13/98 2:15	1 QTR	SOIL		AS, CR, CU, PB, HG	TCLP - PB, CR, AS	Run today first then TCLP on about
75-P17	7/13/98 2:30	1 QTR	SOIL		"	"	"
W1	7/13/98 2:45	2 Liter water	H ₂ SO ₄		AS, PB, CR, AS		Run Hg if over 2 ppm in soil
							Report completed

SAMPLERS: (Signature) <i>[Signature]</i>	Relinquished by: (Signature) <i>[Signature]</i>	Date: 7/13/98	Received by: (Signature) <i>[Signature]</i>	Date: 7/13/98
	Relinquished by: (Signature) <i>[Signature]</i>	Time: 3:20	Received by: (Signature) <i>[Signature]</i>	Time: 3:20
	Relinquished by: (Signature) <i>[Signature]</i>	Date:	Received by: (Signature) <i>[Signature]</i>	Date:
	Relinquished by: (Signature) <i>[Signature]</i>	Time:	Received by: (Signature) <i>[Signature]</i>	Time:
	Relinquished by: (Signature) <i>[Signature]</i>	Date:	Received by: (Signature) <i>[Signature]</i>	Date:

REMARKS:	Received for laboratory: (Signature) <i>[Signature]</i>	Date: 7-31-98
	Data Results to:	Time: 1520
	Received for laboratory: (Signature) <i>[Signature]</i>	Date:
	Received by: (Signature) <i>[Signature]</i>	Time:
	Received by: (Signature) <i>[Signature]</i>	Time:

FILE COPY

RECEIVED

JUN - 1 1999

DEQ-OPC



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director



May 28, 1999

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 3746982

FILE COPY

*Not paid
for November
thru March
?*

25 Staff hour @ \$75.00/Hr. for 04/99	\$1,875.00
37 Staff hour @ \$75.00/Hr. for 11/98 - 03/99	\$2,775.00
Plus: One half of advance paid to MDEQ	(\$3,000.00)*
Total Amount Due	<u>\$1,650.00</u>

*Advance has been reduced by the \$500.00 non-refundable amount.

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$1,650.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Suzanne Polander, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

May 20, 1999

Mr. Andy Alfonso
Hancock Bank of Gulfport, Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: Gulfport Fertilizer Site
Soil and Groundwater Sampling Rationale, dated May 5, 1999, and Site Characterization Work Plan, dated May 5, 1999
Gulfport, Mississippi

Dear Mr. Alfonso:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced documents submitted by Butler Services, Incorporated on behalf of Hancock Bank of Gulfport, Mississippi. The MDEQ cannot approve the referenced documents until the following concerns are properly addressed:

- (1) The proposed locations for the collection of background samples are inappropriate. Background samples are to be collected in areas in which the soils would not have been impacted by the operations of facility. The background soil samples shall be collected from the same sampling intervals as the investigative soil samples. Please revise your proposed sample locations and depths to meet the above criteria and resubmit them for approval.
- (2) The soil cuttings from borings **SHALL NOT** be returned to the boreholes. The soil cuttings shall be drummed and characterized for disposal at a permitted facility.
- (3) The Toxicity Characteristics Leaching Procedure (TCLP) samples shall be collected at the locations and depths with the highest concentrations of total lead and total arsenic. A total lead and total arsenic analysis shall be run in addition to TCLP analysis for each location to ensure that the sample collection locations have been properly identified.

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289-0385 Phone 601.961.5171 Fax 601.354.6612

Mr. Andy Alfonso
May 17, 1999
Page 2

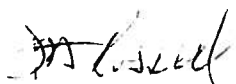
- (4) Monitoring Wells One (MW-1) and Two (MW-2) shall be resampled using the slow-purge method. If the groundwater at the site is found to be contaminated, then vertical and horizontal delineation of the groundwater contaminants will be required.
- (5) The Laboratory Analytical Data Sheets shall state the Minimum Quantifiable Levels (MQL) for each constituent and the dilution factor for each sample.
- (6) All soil and groundwater sampling shall be in accordance with the United States Environmental Protection Agency Region IV's Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM) dated May 1996.
- (7) Decontamination procedures shall be in accordance with EISOPQAM. Specifically,
 - (a) Clean equipment with tap water and Liquinox, not Alconox, using a brush if necessary to remove particulate matter and surface films. Equipment may be steam cleaned (Liquinox and high pressure hot water) as an alternative to brushing. Sampling equipment that is steam cleaned should be placed on racks or saw horses at least two feet above the floor of the decontamination pad. The decontamination pad shall meet the specifications outlined in section B.2.1. PVC or plastic items should not be steam cleaned.
 - (b) Rinse thoroughly with tap water.
 - (c) Rinse thoroughly with analyte free water.
 - (d) Rinse thoroughly with pesticide-grade isopropanol. Do not solvent rinse PVC or plastic items.
 - (e) Rinse thoroughly with organic/analyte free water. If organic/analyte free water is not available, equipment should be allowed to completely air dry. Do not apply a final rinse with analyte water.
 - (f) Remove the equipment from the decontamination area and cover with plastic or aluminum foil when not in use. Equipment stored overnight should be wrapped in aluminum foil and covered with clean, unused plastic.

Mr. Andy Alfonso
May 17, 1999
Page 3

- (8) Section 1.1 of the Site Characterization Work Plan references a Phase I Environmental Assessment Report written by Covington & Associates Corporation. MDEQ requires that a copy of this report be submitted to us for our review.
- (9) MDEQ shall be provided with the chain of custody forms for Sample ID T5-50 18", for Sample ID T5-PIT 24", and for Sample ID MW-1 which were collected on 7/31/98. MDEQ shall also be provided with the well sampling field data sheet for monitoring well one (MW-1).
- (10) The Site Characterization Report shall be submitted to MDEQ within sixty (60) days after completion of field work.
- (11) MDEQ shall be provided the opportunity to observe field work and collect split samples. You shall provide MDEQ with the appropriate sample containers and preservatives should MDEQ request to split samples. MDEQ shall be notified a minimum of two (2) weeks prior to conducting any field work or sampling event.

The MDEQ requires that your comments and the additional items listed above be submitted to MDEQ by June 7, 1999. If you have any questions or comments regarding this matter, please contact Penny Johnston at (601) 961-5388.

Sincerely,



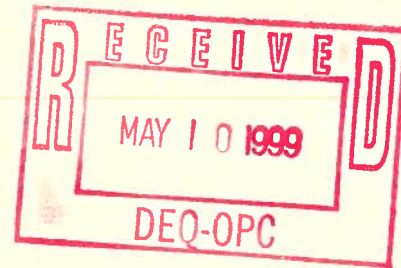
Tony Russell, Chief
Uncontrolled Sites Section

cc: Mr. Denton Bates, P.E. Butler Services, Inc.

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

May 5, 1999

Ms. Penelope Johnson, Project Officer
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385



FILE COPY

RE: Site Characterization Work Plan
Former Gulfport Fertilizer Plant
33rd Street, Gulfport, Mississippi

Dear Ms. Johnson:

We are transmitting herewith a Work Plan for characterization of the remainder of the 33.06 acre site located on 33rd Street in Gulfport, Mississippi for your review and comments. We have been authorized by the Hancock Bank to proceed with this phase of the work upon receipt of your approval of the plan

If you should have any questions or require any additional information, please contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely,
BUTLER SERVICES OF MISSISSIPPI, INC.

William D. Bates, P.E.
Project Manager

WDB:ib

Attachments: Site Characterization Work Plan, dated May 1999

cc: Mr. Charles Webb, Executive Vice President, The Hancock Bank w/attachments

**WORK PLAN
SITE CHARACTERIZATION REPORT
FORMER GULFPORT FERTILIZER PLANT SITE
33RD STREET
GULFPORT, MISSISSIPPI**

**PREPARED
FOR
THE HANCOCK BANK
COMMERCIAL LOAN DEPARTMENT
2510 14TH STREET
GULFPORT, MS 39501**

**PREPARED BY
BUTLER SERVICES OF MISSISSIPPI, INC.
PO Box 1164
PASCAGOULA, MISSISSIPPI 39568-1164
(228) 769-6983**

May 1999

TABLE OF CONTENTS

	<u>Page No.</u>
1.0 BACKGROUND	1
1.1 SAMPLING RATIONAL	1
1.2 PREVIOUS INVESTIGATIONS	2
2.0 OBJECTIVES	3
3.0 INVESTIGATIVE ACTIVITIES	3
3.1 SITE RECONNAISSANCE & GRID MARKING	3
3.2 DETERMINATION OF ARSENIC BACKGROUND CONCENTRATIONS	4
3.3 SUBSURFACE SOIL DETERMINATION	5
3.4 SOIL LEACHABILITY	6
4.0 HEALTH AND SAFETY	6
5.0 SITE CHARACTERIZATION REPORT	6

FIGURES

Figure 1 – Site Location/Vicinity Map

Figure 2 – Site Map

Figure 3 – Proposed Soil Sample Location

**SITE CHARACTERIZATION
WORK PLAN
FORMER GULFPORT FERTILIZER PLANT
GULFPORT, MISSISSIPPI**

1.0 BACKGROUND

The subject property is an approximate 33.06-acre parcel of land located on 33rd Street approximately 1 block west of its intersection with State Highway 49 in Gulfport, Mississippi. The Gulfport Fertilizer Company, which closed for business in circa 1960, was formerly located on the subject property. The fertilizer company reportedly manufactured superphosphate fertilizer. Improvements to the land once consisted of concrete buildings, surfaced roads and railroad spurs, but the improvements have been largely destroyed.

1.1 Sampling Rational.

Background information contained in the Phase I Environmental Assessment conducted by Covington & Associates, Inc. (Covington) and reviewed by Butler Services of Mississippi, Inc. (Butler) revealed that the subject site was used predominately for the production of phosphate fertilizer. There was no evidence of activities that would generate hazardous substances from the other operations that were briefly located at the site over the fifty or so years the site was utilized for industrial and manufacturing purposes other than the phosphate fertilizer operations. Further, samples collected by Covington as a part of a limited Phase II Environmental Assessment of a portion of the site were analyzed for metals, volatiles, semi-volatiles and pesticides. The constituents of concern identified with elevated levels in the soils were lead and arsenic.

Butler obtained additional information regarding the composition of phosphate rock used in fertilizer plant operations from a local manufacturer. When the phosphate fertilizer plant was in operation the type of phosphate commonly manufactured at that time was normal super-phosphate. Normal super-phosphate is manufactured by introducing sulfuric acid to phosphate rock (tri-calcium-phosphate). Typically, the phosphorous pentoxide, referred to as P2O5, and calcium oxide content of the rock used in production at the time the plant was operating was about 33% and 48%, respectively. The remainder of the constituents in the phosphate rock consisted of lead and arsenic as well as a low percentage of other compounds such as aluminum,

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

iron, carbon dioxide, fluorine and miscellaneous trace elements. Hence, based upon the foregoing, lead and arsenic were identified as the constituents of concern.

1.2 Previous Investigations.

A subsurface investigation was conducted by Covington and Associates (Covington) for a potential purchaser in May and June of 1998. The investigation focused on an area approximately 720 feet (ft.) by 720 ft. in the northern half of the 33.06 acre parcel. Exploratory soil pits and two 4-inch diameter monitoring wells were installed during this investigation. The results of soil samples collected by Covington at the site indicated that elevated levels of lead (ranging up to 11,000 milligrams per kilogram (mg/kg)) and arsenic (ranging up to 1,310 mg/kg) contamination exists in the subsurface soils. Contamination at low levels was shown to exist in the groundwater, as well

On September 30 and October 1, 1998, Butler Services of Mississippi, Inc. (Butler) performed soil and groundwater sampling using direct push probes and groundwater sampler as manufactured by Geoprobe. The primary purpose of this subsurface investigation was to characterize a 7.9 acre portion of the subject property along the eastern boundary. The results of the soil samples collected within the 7.9 acre parcel indicated lead and arsenic levels in subsurface soils ranging from less than 0.1 mg/kg to 306 mg/kg and from less than 0.1 mg/kg to 10.2 mg/kg, respectively with the exception of two distinct areas. One of the areas with subsurface soil contamination is located adjacent to the former railroad spur, approximately 800 feet south of the northeast corner of the subject property. The second area with subsurface soils that contained elevated levels of arsenic only is located 400 ft. south and 300 ft. west of the northeast corner of the subject property. Additional soil sampling was conducted in an isolated area adjacent to the former railroad spur on October 21, 1998 and February 12, 1999. The analytical results from this additional sampling indicate that lead contamination exceeding 400 mg/kg and arsenic contamination exceeding 15 mg/kg are confined to the property in an area approximately 20 ft by 20 ft. Lead and Arsenic levels in the groundwater samples collected along the eastern property boundary and western perimeter of the 7.9 acre parcel were all less than the laboratory detection limits of 0.005 milligrams per liter (mg/l) with the exception of samples collected in an area near the former railroad spur. The samples in this isolated area correlate with the elevated levels found in the soil in this same area.

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

Iso-concentration maps were prepared utilizing the analytical results from the Butler and Covington investigations. The source areas from the maps appear to be located in an area in the northern half of the property that was identified in the aerial photographs and background information in the Phase I Environmental Assessment. This area is located where the primary fertilizer plant operations were centered.

2.0 OBJECTIVES

The objectives of this phase of the work is to (1) delineate the extent of subsurface contamination in the soils of the remainder of the approximate 33 acre subject property, (2) develop background concentration levels for determining action levels, and (3) collect soil samples in the southern half of the subject property to mitigate any future questions as to the levels of constituents in this area. Discreet soil samples will be collected at depths in the source areas to supplement the exploratory pit and composite surface samples collected by Covington. The purpose of the discreet samples is to better define the horizontal and vertical extent of contamination in the source areas.

3.0 INVESTIGATIVE ACTIVITIES

The following investigative activities will be conducted on the remainder of the 33-acre site to delineate the extent of subsurface soil contamination on the subject property:

3.1 Site Reconnaissance & Grid Marking

Mississippi One Call System, Inc. will be contacted to mark the location of any gas, water, and sewer or buried electrical lines at the site prior to initiating subsurface drilling activities. Traffic cones and caution tape will be used as necessary to restrict traffic into work areas. No permit requirements are anticipated for use of the direct-push equipment during the investigation.

The areas to be investigated will be measured and staked in a grid pattern. A 100-foot horizontal grid for sampling will be extended from the east to the west in the area of the former plant operations on the northern half of the property. In addition, 200-foot grid pattern will be extended east to the west to the southern property line of the subject property. Although, there has been no evidence developed to date that any significant industrial/manufacturing activities occurred in the southern portion of the subject property, Butler has been requested to collect soil

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

samples in this area to mitigate any future questions as to the levels of constituents in this area. The proposed soil sampling locations are identified in "Work Plan Proposed Soil Sample Locations," Figure No. 1. . Flags will be placed at the specific grid points to mark where soil borings are to be advanced.

3.2 Determination of Arsenic Background Concentrations.

It is proposed that six (6) to eight (8) random background samples be collected at a depth of 1 to 2-feet below ground surface to establish background concentrations of arsenic (As) in the native soils resulting from naturally occurring or anthropogenic sources. Background samples will be taken from areas outside of suspected hazardous waste activities identified in the Phase I Environmental Assessment and/or source areas delineated on the Iso-concentration maps prepared from previous subsurface sampling activities on the subject property. The type(s) of soil underlying the site and their characteristics were considered in selecting the background samples for analyses.

The three distinctive soil types within the boundaries of the subject property are the Harleston, Atmore, and Plummer series according to soil survey information available from the Natural Resources Conservation Service, Soil Series Survey. The predominate soil type underlying 90 to 95 percent (%) of the subject property is the Harleston series. The Atmore and the Plummer soil types are located along the eastern and northern property boundary, respectively.

The Harleston series, a non-hydric soil type, is a yellowish-brown to pale-brown loamy sand overlain by 0 to 8-inches of very dark grayish brown loamy sand. These soil characteristics were observed during the subsurface investigation of the 7.9-acre portion of the subject property conducted by Butler. These soil characteristics were noted down to the water bearing zone that was encountered approximately 4-feet below ground surface at the site. The background soil samples will be collected from the Harleston soil type only since it is the predominate soil type that underlies the suspected areas of the fertilizer plant activities.

The background soil samples will be analyzed for arsenic using United States Environmental Protection Agency (USEPA) Method SW 846, 6010A-ICP. This soil data will then be used to develop background limits based on guidance from USEPA Engineering Forum Issue:

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

Determination of Background Concentrations of Inorganics in Soils and Sediments at Hazardous Waste Sites, December 1995.

3.3 Subsurface Soil Delineation

The subsurface investigation in the area of the former plant activities will include advancing 37 direct-push probes with a soil-probing machine, as manufactured by Geoprobe, to further delineate the extent of soil contamination in this area. The Geoprobe is a vehicle mounted hydraulically powered soil probing machine that uses static force and percussion to advance sampling tools into the subsurface to collect soil, groundwater or vapor samples.

Although, there has been no evidence developed to date to indicate that any significant industrial/manufacturing activities occurred on the southern one-half of the property, Butler has been requested to collect soil samples to mitigate any future questions as to the levels of constituents in this area. It is anticipated that 20 direct-push probes will be advanced by Geoprobe on a 200-foot grid in the southern portion of the subject property.

The soil borings in the areas noted above will be advanced using Geoprobe's Macro-core soil sampler, a 48-inch long by 2-inch diameter soil sampler capable of recovering a sample that measures up to 1300 ml in volume in the form of a 46-inch x 1.5-inch core. A releasable probe point will be attached to the bottom of the sampling tube to prevent soil from entering the tube until the sampling depth is reached. The sampler will be pushed into the soil with connected 4-foot long hollow probe rods. Once the sample depth is reached the point will be released and the sampling tube will be driven into undisturbed soil. Soil samples will be collected using new clear PVC sample collection liners that are approximately 46-inch long by 1.75-inches in diameter. Soil samples collected will be logged at two-foot intervals to a suspected maximum depth of five feet below ground surface (bgs) or until groundwater is encountered, whichever occurs first. It is anticipated that groundwater will be encountered less than five feet bgs. The sampler and sample tubes will be decontaminated in an aqueous solution of Alconox and rinsed with distilled water prior to the collection of each sample. After samples had been collected from the soil cores, the remaining soil will be returned to the borehole. The boring will then be sealed to the ground surface with Bentonite.

**SITE CHARACTERIZATION WORK PLAN
FORMER GULFPORT FERTILIZER PLANT**

It is estimated that a total of 114 soil samples will be collected for independent laboratory analysis. The samples will be transferred to laboratory cleaned and properly preserved glass jars, sealed with a teflon-lined cap and labeled. The samples will then be placed into plastic zip-lock bags and delivered to an appropriately certified environmental laboratory in a chilled condition for analyses. A chain-of-custody will be maintained to trace sample custody. The soil samples will be analyzed by the laboratory for lead (Pb) and arsenic (As) using USEPA Method SW 846, 6010A-ICP.

3.4 Soil Leachability

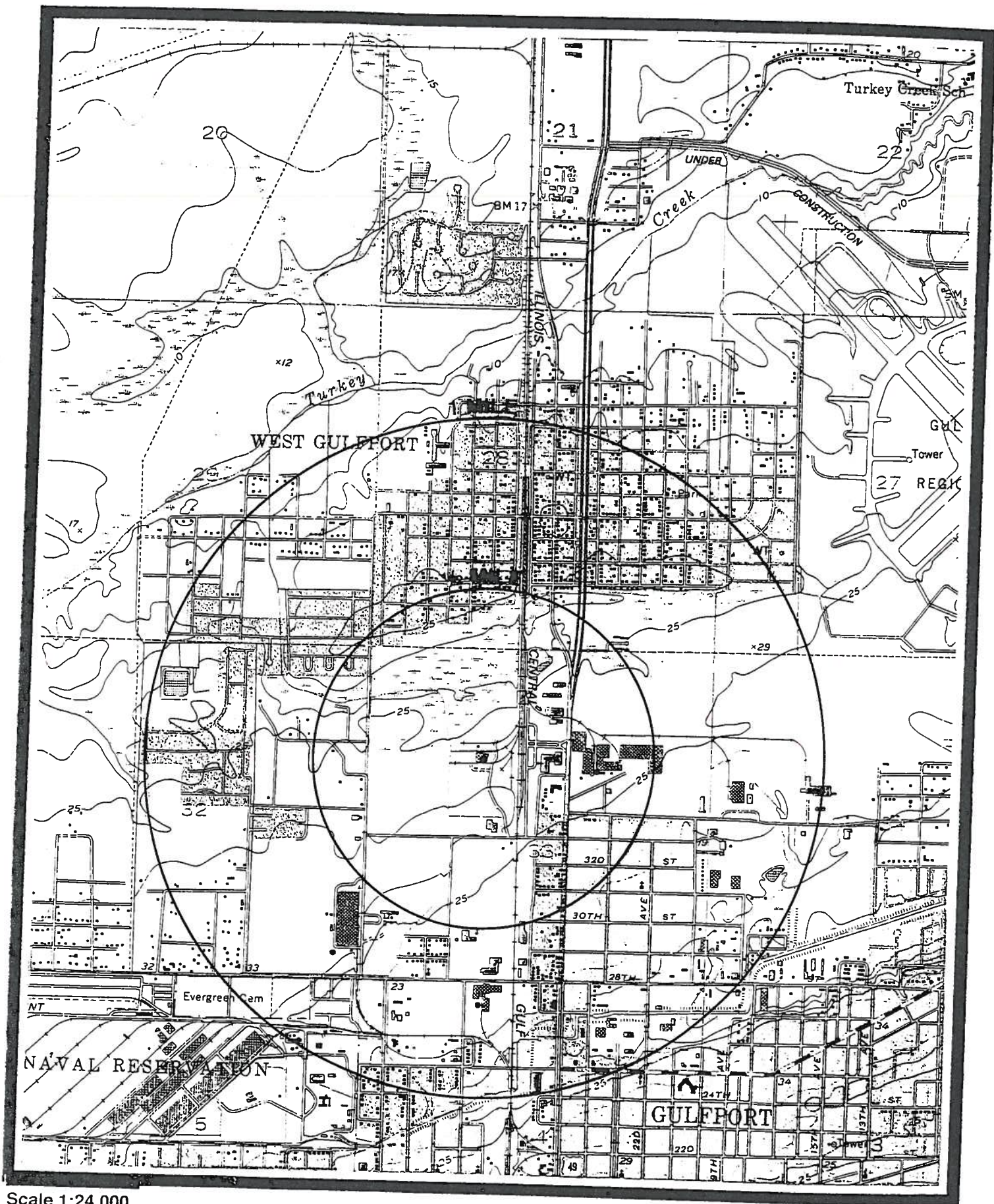
A total of five (5) soil samples will be collected at a depth of 2-feet below ground surface from the source areas identified on the iso-concentration maps for analyses. The samples will be analyzed for lead and arsenic contamination using the USEPA's Toxic Characteristic Leaching Procedure (TCLP).

3.0 HEALTH AND SAFETY

The field sampling work will be performed under a written Health and Safety Plan (HASP) prepared by Butler. A Health and Safety meeting will be held at the site with the Geoprobe subcontractor and Butler personnel prior to initiating any site activities. A Site Safety Officer will be designated to see that the work is performed according to the HASP.

4.0 SITE CHARACTERIZATION REPORT

After completion of site activities and receipt of laboratory data and analyses, a Site Characterization Report will be prepared. The report will include a summary of the work that was conducted, the procedures that were used, pertinent findings, conclusions regarding the extent of contamination present at the site, and recommendations for further assessment work, if warranted.



Scale 1:24,000

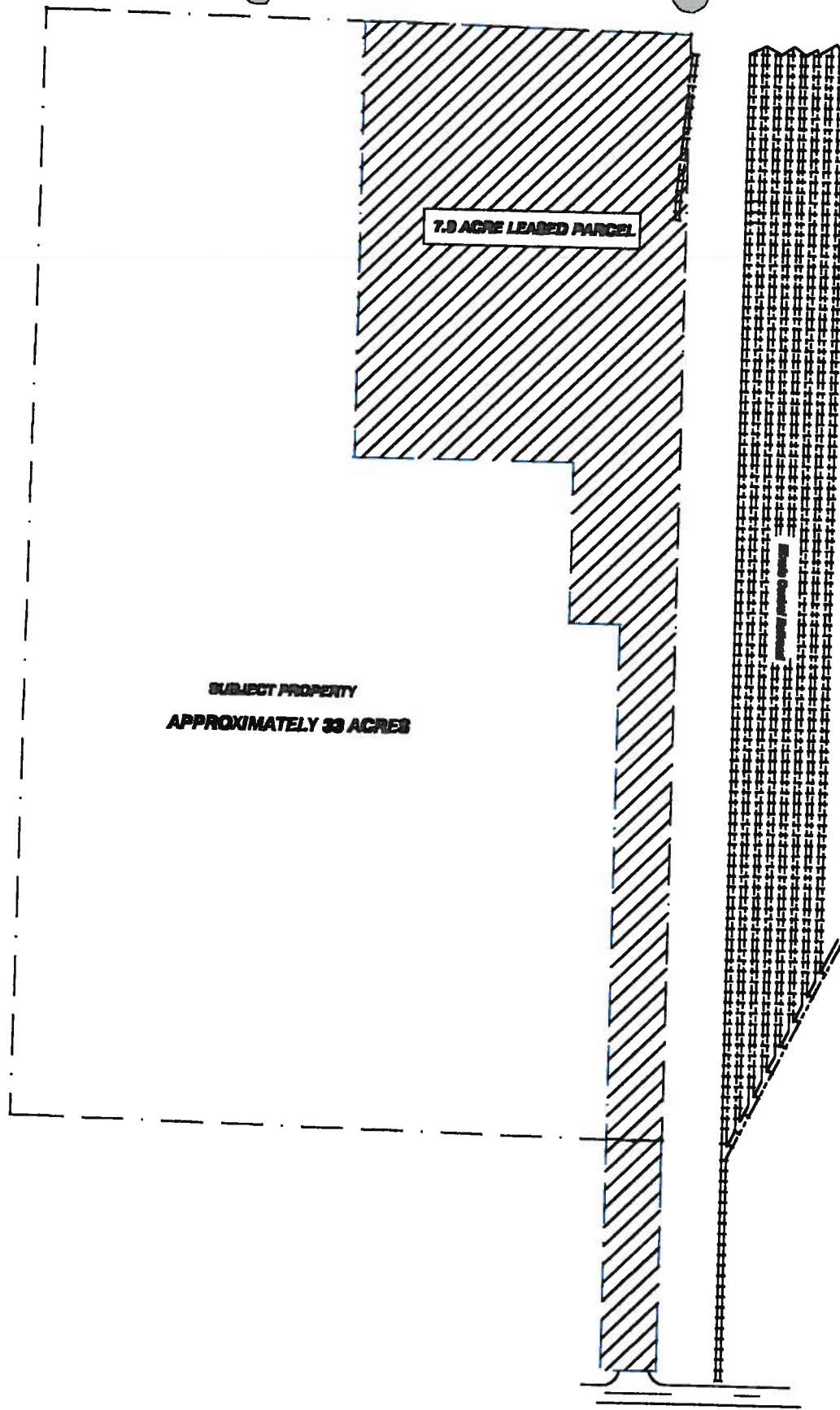


FIGURE NO. 2 SITE LOCATION MAP
7.9 ACRE PARCEL
GULFPORT, MS

BUTLER SERVICES OF MS, INC.
Post Office Box 1164
PASCAGOULA, MS 39568
(888) 782-8863 Fax 782-1219 E-Mail BUTLERMS@aol.com

iron, carbon dioxide, fluorine and miscellaneous trace elements. Hence, based upon the foregoing, lead and arsenic were identified as the constituents of concern.

We are also attaching a copy of the laboratory results of Toxicity Characteristic Leaching Procedure (TCLP) analyses of two soil samples that we had collected for the purpose of evaluating the preliminary treatability of the soil. These soil samples were collected from the pit and a previous soil sample location identified as the T5-Pit and T5-50 on the maps furnished by Covington to our client. They were selected based on the elevated levels of lead and arsenic encountered at these two locations during the limited Phase II Environmental Assessment. The laboratory metal analyses results of a water sample collected from MW-1 is also included for your information in the attached data. Additional soil samples will be collected for leachability analyses and will be identified in the work plan to be submitted to your office, as a part of the next phase of our investigation of the remainder of the site.

At our meeting in February, there was also a question as to whether or not elevated levels had migrated off-site at the hot spot identified along the eastern boundary near the railroad right-of-way. Additional samples (S51-East ft. East and S61-East) were collected on the eastern property boundary on February 12, 1999 and transmitted via a chain of custody to Micro-Methods, Inc. in Ocean Springs, Mississippi for analyses. The sample results indicate that the hot spot is limited to the site and is within the property boundary. A copy of the laboratory results is attached for your information and use.

If you should have any questions or require any additional information in connection with the questions raised at our previous meeting, please contact the writer or Louis Fortenberry.

Sincerely,
BUTLER SERVICES OF MISSISSIPPI, INC.

William D. Bates, P.E.
Project Manager

WDB:ib

Attachments: Sample Location Map (S51E & S61E).
Micro-Methods, Inc. Report of Analyses, dated February 17, 1999.
Chain of Custody Record for soil samples collected on February 12, 1999.
Micro-Methods, Inc. Inorganics/Organics Data Sheets (T5-50, T5-Pit, & MW-1).

BRUNINI, GRANTHAM, GROWER & HEWES, PLLC
ATTORNEYS AT LAW

FILE COPY

GARY C. RIKARD

1400 TRUSTMARK BUILDING / 248 EAST CAPITOL STREET
JACKSON, MISSISSIPPI 39201

EDMUND L. BRUNINI
(1911-1992)

DIRECT: 601-960-6932
E-MAIL: grikard@brunini.com

POST OFFICE DRAWER 119
JACKSON, MISSISSIPPI 39205

R. GORDON GRANTHAM
(1912-1986)

TELEPHONE: 601-948-3101
FACSIMILE: 601-960-6902

JOHN M. GROWER
OF COUNSEL

March 26, 1999

Ms. Penny Johnston
MDEQ, Air Division
Capitol Street
Jackson, MS



RE: Gulfport Fertilizer Company
Gulfport, Mississippi
Harrison County

Dear Ms. Johnston:

Pursuant to your request, enclosed in an additional copy of the Phase II environmental assessment report for the above referenced facility.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Brunini, Grantham, Grower & Hewes, PLLC


Gary C. Rikard

GCR/mb
Enclosure

BRUNINI, GRANTHAM, GROWER & HEWES, PLLC
ATTORNEYS AT LAW

GARY C. RIKARD

1400 TRUSTMARK BUILDING / 248 EAST CAPITOL STREET
JACKSON, MISSISSIPPI 39201

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POST OFFICE DRAWER 119
JACKSON, MISSISSIPPI 39205

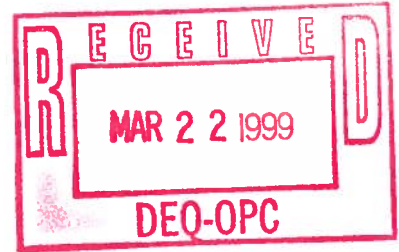
R. GORDON GRANTHAM
(1912-1986)

TELEPHONE: 601-948-3101
FACSIMILE: 601-960-6902

JOHN M. GROWER
OF COUNSEL

March 22, 1999

Ms. Penny Johnston
Post Office Box 20305
Jackson, Mississippi 39289



RE: Gulfport Fertilizer Company
Gulfport, Mississippi
Harrison County

FILE COPY

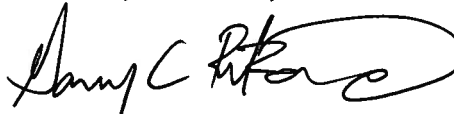
Dear Ms. Johnston:

Pursuant to your request, enclosed is the Phase II environmental assessment report for the above referenced facility.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Brunini, Grantham, Grower & Hewes, PLLC



Gary C. Rikard

GCR/mb



MICRO-METHODS

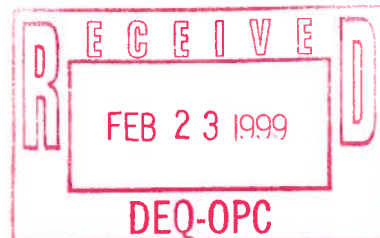
LABORATORY, INC.

ANALYTICAL SERVICE COMPANY

12-Feb-99

Butler Services
ATTN: Louis Fortenberry
P O Box 1164
Pascagoula, MS 39567

RE: LF #176-BS-10-98
LF #177-BS-10-98



Dear Mr. Fortenberry:

As per your request, the lower limits for reporting arsenic and lead in soil is <0.1 mg/kg and arsenic and lead in water is <5 $\mu\text{g/l}$ for the above referenced project. If further information is needed, please contact the office.

Sincerely,

Harry P. Howell

HPH/tt

Butler Services of Mississippi, Inc.
~ Environmental Consulting Services ~

Post Office Box 1164 ~ Pascagoula, MS 39568-1164
Telephone 228-769-6983
800-264-6711
Fax 228-769-1219

FAX Transmission Cover Sheet

Total Number of Pages (excluding this cover sheet): 1

*** TO ***

Individual:

MS PENNY A. JOHNSTON

Personal Phone:

601-961-5741

Department:

UNCONTROLLED SITES

Company:

MS DEQ

Fax Phone:

601-961-5300

** FROM **

Individual:

LOUIS FORTENBERRY

Personal Phone:

Department:

Company:

Fax Phone:

** MATERIALS BEING TRANSMITTED **

MICRO METHODS LETTER ON

DETECTION LIMITS FOR ARSENIC and LEAD.

fw



ANALYTICAL SERVICE COMPANY

12-Feb-99

Butler Services
ATTN: Louis Fortenberry
P O Box 1164
Pascagoula, MS 39567

RE: LF #176-BS-10-98
LF #177-BS-10-98

Dear Mr. Fortenberry:

As per your request, the lower limits for reporting arsenic and lead in soil is <0.1 mg/kg and arsenic and lead in water is <5 µg/l for the above referenced project. If further information is needed, please contact the office.

Sincerely,

Harry P. Howell

HPH/tt



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

RECEIVED
JUL 26 2001
FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Adams Johnston
DATE: February 10, 1999
SUBJECT: Meeting at MDEQ

On the above date the attached list of individuals meet to discuss the above referenced site. The following is a list of comments and requirements that resulted from the discussion.

- It is only necessary to address the 7.9 acres at this time.
- The site must be delineated.
- If the contaminated soil at the site passes the TCLP analysis:
 - the contaminated soil could be dug up and placed on the additional acres , or
 - the contaminated soil could be placed in roll off boxes and disposed of at a properly permitted facility.
- If the contaminated soil at the site does NOT pass the TCLP analysis:
 - one possibility would be to mix the contaminated soil with cement in order to stabilize it.
- They are to pull another TCLP sample from the site.
- They are to provide MDEQ with pH data for the site.
- They are to provide MDEQ with a rational for their sampling methodology (specifically: only sampling for lead and arsenic).
- They can run a statistical analysis in order to determine a background level for arsenic at the site using the EPA document Determination of Background Concentrations of Inorganics in Soils and Sediments at Hazardous Waste Sites. They were provided with a copy of this document at this meeting.
- The client (Hancock Bank) can decide whether or not they would like to keep the site as it is in the Voluntary Evaluation Program (VEP), whether or not they would like to enter into an Industrial Agreed Order for the site under the VEP, or whether or not they would like to enter the site into the

Gulfport Fertilizer Site Meeting Memo
February 10, 1999
Page 2

Brownfields Program. It was explained to them that the entire site, not just the 7.9 acres currently being addressed, could be handled under either program. They were provided with a copy of the Industrial Agreed Order at the meeting for their review.

Meeting Attendees List

Date February 10, 1999

Company or Site	Gulfport Fertilizer Site
-----------------	--------------------------

Location of Site	Gulfport, Mississippi
------------------	-----------------------

[illegible]



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

December 7, 1998

FILE COPY

CERTIFIED MAIL NO. Z039567811 RETURN RECEIPT REQUESTED

Mr. Andy Alfonso
Hancock Bank of Gulfport, Mississippi
P.O. Box 4019
Gulfport, Mississippi 39502-4019

RE: Former Gulfport Fertilizer Plant, Gulfport, Mississippi
Site Characterization Report, dated November 1998

Dear Mr. Alfonso:

The Mississippi Department of Environmental Quality (MDEQ) is currently reviewing the referenced report that has been prepared by Butler Services of Mississippi, Inc. and presented on behalf of Hancock Bank. The initial review indicates that there appears to be areas of elevated contamination, yet the nature and extent of contamination have not been determined for the 7.9 acre area. No maps were presented that depict the areal and vertical extent of contamination. Also, rationale for analyzing soil and groundwater samples for only Arsenic and Lead was not presented. Additionally, a corrective action plan was not presented addressing the contaminated media.

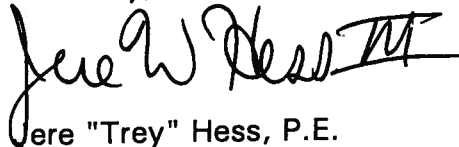
In order to complete our review, the nature and extent of contamination must be determined. Therefore, the referenced report should be revised to do so. Also, MDEQ requires copies of all investigation reports describing previously conducted investigation work. As discussed in our meeting on November 4, 1998, with Ms. Joy Phillips, adherence to our DRAFT Brownfields Site Characterization Report and Corrective Action Plan Format (Copy Enclosed) can greatly enhance the expedited review process. The information that we have received to date does not address all the items listed in the Format.

MDEQ does not intend to object to the proposed leasing of the property provided construction and site activity is limited to those areas that do not exhibit elevated concentrations of contamination. For MDEQ to require no further action for the site, we must evaluate the nature and extent of contamination, as well as any remedial activity that may be necessary.

Letter: Mr. Andy Alfonso
December 7, 1998
Page 2 of 2

Should you have any questions or comments concerning this matter, please contact me at 601-961-5654.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry W. Hess" with a stylized flourish at the end.

Jerry "Trey" Hess, P.E.
Acting Chief, Brownfields Section

Enclosure

D:\Gulfport Fertilizer Plant Site Letter_11-30-98 (dpt).wpd



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

December 15, 1998

FILE COPY

CERTIFIED MAIL NO. Z278184308 RETURN RECEIPT REQUESTED

Mr. Andy Alfonso
Hancock Bank of Gulfport, Mississippi
P.O. Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Plant Site
Signed Agreed Order No. 3746-98
Gulfport, Mississippi

Dear Mr. Alfonso:

Enclosed is a copy of Agreed Order No. 3746-98 which has been issued by the Mississippi Department of Environmental Quality (MDEQ) as a result of environmental issues regarding the above referenced site in Gulfport, Mississippi. Your cooperation in carrying out the provisions of this order is encouraged.

You should address questions regarding this document to me. My telephone number is (601) 961-5654.

Sincerely,

Jere "Trey" Hess, P.E.
Acting Chief, Brownfields Section

Enclosure

D:\Gulfport Fertilizer Plant Site Cover Letter for Signed Agreed Order Form_12-15-98 (dpt).wpd



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

December 9, 1998

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

A.J. Alfonso, Vice President
Hancock Bank
Post Office Box 4019
Gulfport, MS 39502-4019

Dear Mr. Alfonso:

In order to settle certain environmental issues regarding the Uncontrolled Site Voluntary Evaluation Program, you have agreed to the conditions of Administrative Order No. 3746 98. A copy of the order is enclosed.

If you have any questions in this matter, please contact Mr. Derrick Tucker at telephone #601-961-5171.

Sincerely,

Charles Chisolm, P.E., D.E.E., Head
Office of Pollution Control

CHC:pl
Enclosure
cc: Mr. Derrick Tucker

BEFORE THE MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

**In re: Matter of Hancock Bank of Gulfport, Mississippi
P.O. Box 4019
Gulfport, Mississippi 39502-4019**

Order No. 3746

98

AGREED ORDER

The Mississippi Commission on Environmental Quality ("Commission"), the Mississippi Department of Environmental Quality ("MDEQ") and Hancock Bank of Gulfport, Mississippi, ("Hancock Bank") now enter the following agreement pursuant to the Uncontrolled Site Voluntary Evaluation Program ("Program") created in Miss. Code Ann. § 17-17-54(2) (Supp. 1997), as follows:

1. Hancock Bank is the owner of a former fertilizer plant site ("site") located in Gulfport, Mississippi. MDEQ has reason to believe that conditions exist at the site which warrant oversight by MDEQ. Hancock Bank has transmitted information regarding these conditions in the form of Site Characterization Report, dated November, 1998.
2. The site is an uncontrolled site within the purview of Miss. Code Ann. § 17-17-54. Hancock Bank desires to submit this site for participation in the Program. By this agreement, MDEQ accepts the site for participation in the Program.
3. Hancock Bank agrees to the following terms and conditions of participation in the Program:
 - (a) Hancock Bank will pay to MDEQ simultaneously with the execution of this document by Hancock Bank a non-refundable Program application fee of \$500.00
 - (b) Hancock Bank will pay all costs of MDEQ's actions associated with MDEQ's administration and evaluation of the site. For the first twelve months in which this Agreed Order is effective, these costs will be calculated at the rate of \$75.00 per hour for each hour of MDEQ project officer time spent reviewing, assessing, investigating, reporting on, taking administrative action in regard to, analyzing or studying the site or the information and plans regarding the site submitted by Hancock Bank, plus MDEQ's actual costs (above and beyond project officer time) for obtaining and analyzing split samples and additional samples deemed necessary by MDEQ. These

costs will also apply to project officer time spent conducting these duties prior to the issuance of this order, but not beginning before November 4, 1998. Analytical costs will be charged as shown on the relevant schedule of analytical costs, attached to this order as Appendix 1. MDEQ reserves the right to increase or decrease the per hour and analytical cost schedule at any time after the first twelve months in which this Agreed Order is effective. In case of such an increase or decrease, MDEQ will notify Hancock Bank in writing of the new cost schedule, and the new cost schedule will become effective forty-five days after the date of the written notice to Hancock Bank. If Hancock Bank determines to discontinue its participation in the Program for the site after a change by MDEQ in the per hour and analytical cost schedule, Hancock Bank may terminate its participation in the program as is stated in paragraph 9, below. MDEQ will send an invoice to Hancock Bank on a monthly basis stating the program costs assigned to the site that have not been paid prior to the date of invoice by Hancock Bank, and Hancock Bank will pay that amount to MDEQ, for deposit into the Uncontrolled Site Evaluation Trust Fund ("Fund"), within 30 days following the invoice date.

(c) Hancock Bank will pay to MDEQ simultaneously with the execution of this document by Hancock Bank an advance of the total to be paid to MDEQ pursuant to subsection 3(b) of this agreement in the amount of \$6,000.00. This amount will be deposited into the Fund to be used by MDEQ as payment of partial payment for the project costs charged to Hancock Bank in the first and last invoices sent by MDEQ to Hancock Bank. MDEQ will credit one half of this amount against the total first invoice amount billed to Hancock Bank. If a credit balance exists for Hancock Bank after deducting the first invoice amount from the first one half of the deposited amount, the remainder of the first one half of the deposited amount will be deducted from the second invoice amount, as so on, until the first one half of the deposited amount is exhausted. Hancock Bank will remain liable for the payment of all invoiced amounts described in subparagraph 3(b), above, in excess of the first one half of the deposited amount. At the completion of MDEQ's involvement with the project, the remaining one half of this amount will be credited against the final invoice sent by MDEQ to Hancock Bank. Hancock Bank will remain liable for the payment of all invoiced amounts described in subparagraph 3(b), above, in excess of the second one half of the deposited amount. Any deposited amount remaining after payment in full of the last project invoice will be refunded to Hancock Bank.

4. MDEQ will expedite review and evaluation of the investigative assessments,

Hancock Bank Agreed Order
Page No. 3

work plans, remedial investigation plans, scopes of work, and remediation design plans submitted by Hancock Bank regarding the site.

5. Hancock Bank will obtain on behalf of MDEQ access to the site to be evaluated pursuant to this Agreed Order, whether the site to be evaluated is owned and/or operated by Hancock Bank or by a third party. If the site to be evaluated is owned or operated by a third party, Hancock Bank will provide to MDEQ within ten days of the execution of this Agreed Order by Hancock Bank a copy of a document assuring MDEQ site access for the remainder of MDEQ's involvement with this site.

6. This agreement is not entered in lieu of any penalty or enforcement action that MDEQ or the Commission may otherwise take in regard to the site or against Hancock Bank. MDEQ and the Commission reserve the right to take any and all administrative and/or legal actions they deem necessary in regard to the site and/or against Hancock Bank. This agreement does not represent the settlement or release of any liability of Hancock Bank for any action, inaction or property condition. Hancock Bank neither admits nor denies liability regarding the environmental condition of the site. MDEQ accepts no responsibility by entering this agreement for activity taken at the site or for the past, present or future condition of or contamination present at the site.

7. If any part of any amount invoiced to Hancock Bank by MDEQ under this agreement is not paid within thirty days after the due date (sixty days after the date of the invoice), a penalty of up to twenty-five percent of the amount due may be imposed by further order of the Commission and added thereto pursuant to Miss. Code Ann. § 17-17-54(4). If MDEQ is required to pursue legal action to collect fees incurred, reasonable attorneys' fees and costs may be assessed against the nonpaying party.

8. MDEQ may suspend immediately any activities or actions related to the administration or evaluation of the uncontrolled site or sites that are the subject of this agreement if Hancock Bank fails to meet any condition or requirement of or violates any of the following: (1) This agreed order or any other order of the Commission pertaining to the site to be evaluated pursuant to this Agreed Order; (2) Miss. Code Ann. § 17-17-54 (Supp. 1996); (3) any rule or regulation promulgated by the Commission, or (4) any permit issued by the Mississippi Environmental Quality Permit Board.

9. Either Hancock Bank or MDEQ may terminate this agreement upon thirty days prior written notice to the other party. The effective date of the termination will be the thirtieth day after receipt by either party of a written notification of termination. Within thirty days of the effective date of termination, MDEQ will

deliver to Hancock Bank an invoice for all work accomplished prior to the effective date of termination for which Hancock Bank previously has not remitted payment. Hancock Bank will pay the invoice amount to MDEQ, for deposit into the Uncontrolled Site Evaluation Trust Fund ("Fund"), within 30 days following the invoice date. As of the effective date of termination, MDEQ will cease the expedited review of the site, and MDEQ thereafter will determine whether and when to resume review of site information within the normal time frame of the MDEQ uncontrolled sites program.

SO AGREED AND ORDERED, this the 9th day of Dec, 1998.

Charles Chodura
J. I. Palmer, Jr.
Executive Director
Mississippi Commission on
Environmental Quality

AGREED, this the 25th day of Nov., 1998.

BY: [Signature]
TITLE: VICE PRES.
Hancock Bank

STATE OF Mississippi
COUNTY OR PARISH OF Harrison

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named A. J. Alfonso who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the Vice President of Hancock Bank and is authorized by that Corporation to sign this Agreement and to enter this Agreement on behalf of Hancock Bank.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 25th day of November, 1998.

[Signature]
NOTARY PUBLIC

MY COMMISSION EXPIRES:

2/28/99

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
BROWNFIELDS SITE CHARACTERIZATION REPORT AND
CORRECTIVE ACTION PLAN FORMAT**

FILE COPY

General: This guidance presents the recommended content and format for the Brownfield Site Characterization Report and Corrective Action Plan. Please note that this guidance is comprehensive and does not segregate report content or format based on the varied media impacted. Also Note that many of the content items are common for all impacted media. The primary difference is whether the contaminated media are soil, sediment, surface water or groundwater only or a combination thereof and whether contamination is on or off site. The guidance should be used and adapted as appropriate for the specific property being addressed. Strict adherence to this format and inclusion of the suggested contents will lessen the overall review time needed by the Mississippi Department of Environmental Quality (MDEQ) staff.

TITLE PAGE

A Title Page must be provided that includes, at a minimum, the following:

- 1) [BROWNFIELD PROPERTY] Site Characterization Report and Corrective Action Plan
- 2) Date: [DATE]
- 3) Presented on behalf of: [BROWNFIELD PARTY]
- 4) Prepared by: [BROWNFIELD CONTRACTOR FIRM]
- 5) Signature and Seal of the Professional Engineer (PE) responsible for oversight and design coordination for all assignments associated with Site Characterization Report and Corrective Action Plan.

Note: Entries listed above in brackets and capitalized are specific to the Brownfield Property that is the subject of the Site Characterization Report and Corrective Action Plan.

TABLE OF CONTENTS

A Table of Contents listing all required sections and their appropriate page number must be included.

conditionally approved by MDEQ, the applicable sections of the Work Plan and the MDEQ conditions may be referenced. Areas that must be specifically addressed (as applicable to the property's contamination) are listed below:

3.1 Source Area(s) Characterization

Describe the vertical and horizontal extent and degree of contamination for all sources (soil, groundwater, surface water, sediments, air, etc.) and how the physical characteristics of the source area have been investigated.

3.2 Impacted Surface Water and Sediments

Describe the vertical and horizontal extent of contamination of surface water and sediments and how the physical characteristics of surface water and sediment have been investigated.

3.3 Property Geology

Describe how the characteristics of the site specific geology of the property were determined (i.e., thickness of each layer, whether the layers are interconnected, name of the geological formation, aquitard/aquiclude properties, etc.)

3.4 Property Soil and Vadose Zone Characteristics

Describe the site specific soil and vadose zone characteristics (i.e., soil moisture content, soil organic carbon, cation exchange capacity, soil texture, dry soil bulk density, pH, etc.), and how the nature and extent of contamination in soil have been investigated (i.e., sample collection technique, EnCore®, field preservation, hand augering, Photo Ionizing Detector (PID) field screening, etc.) NOTE: If samples have been analyzed for volatile organic compounds, a description of the sample collection techniques must be included and the techniques must be consistent with the Guidance for Collecting Low-level Volatile Organic Compounds in Soil.

3.5 Property Ground Water/Aquifer Characteristics

Describe the site specific groundwater/aquifer characteristics (i.e., hydraulic conductivity, interconnectedness of aquifers, hydraulic gradient, infiltration/recharge, aquifer thickness) and how the nature and extent of contamination in groundwater have been investigated (i.e., GeoProbe®, permanent wells, purging technique, stabilization technique, preservation, EPA Method(s) selection, etc.). NOTE: Purging techniques must be described and

Describe the site specific geology of the property that has been investigated (i.e., thicknesses of each layer, whether the layers are interconnected, geological formations, aquitard/aquiclude properties, etc.).

4.4 Property Soil and Vadose Zone Characteristics

Describe the site specific soil and vadose zone characteristics that have been investigated (i.e., soil moisture content, soil organic carbon, soil texture, dry soil bulk density, pH, etc.).

4.5 Property Ground Water/Aquifer Characteristics

Describe the site specific groundwater/aquifer characteristics that have been investigated (i.e., hydraulic conductivity, interconnectedness of aquifers, hydraulic gradient, infiltration/recharge, aquifer thickness).

4.6 Human/Target Population Surveys

Describe the results from the human/target population surveys that have been investigated (i.e., residential survey, population density, zoning, etc.).

4.7 Area Water Well Surveys

List the results from the public, industrial, and private water well survey that was conducted (i.e., records review, house-to-house survey, etc.). Each well discovered shall be field verified.

4.8 Ecological Target Surveys

Provide a copy of the Ecological Checklist and copies of correspondence with appropriate federal and state authorities.

5.0 Nature and Extent of Contamination

Present the results of the characterization for the media investigated. Describe in detail the horizontal and vertical extent of contamination identified for the media investigated. Provide reference to specific analytical results obtained, tables and figures. Media potentially addressed (based on the contamination of the site) include:

5.1 Sources and Source Areas

5.2 Soils and Vadose Zone

Describe the potential threat to impacted or potentially impacted receptors. Include discussion concerning toxicity of the contaminant(s) as related to the threat or risk posed, how the receptor has been or may be exposed to the contaminant, and other details to fully identify the risk posed by the contamination.

8.0 Summary and Conclusions

8.1 Provide a summary of the results addressing primarily:

8.1.1 Nature and Extent of Contamination

8.1.2 Contaminant Fate and Transport

8.1.3 Identified Receptors/Risk

8.2 Conclusions derived from the site characterization, including:

8.2.1 Conclusions/Recommendations

8.2.2 Data Limitations

9.0 Corrective Action Plan

- 9.1 Based on conclusions from Section 8.2 prepare a detailed description of proposed remedial activities and describe how corrective actions will eliminate or reduce risk to human health and the environment. Remedial actions may include, where appropriate, deed restrictions and engineering controls.
- 9.2 Prepare a detailed schedule for initiation and completion of all remedial actions. Describe remedial action goals and how they will be met and measured. Include a performance monitoring program that will be utilized to evaluate the effectiveness of the remedial action, particularly for active remedial options such as the installation of a pump and treat system. The performance monitoring program must include a list of indicators (i.e., hydraulic head monitoring for containment in a pump and treat system, etc.), and an acceptable range of values for each indicator. Include any verification sampling methodologies, procedures, frequency, number of parameters and Quality Assurance/Quality Control(QA/QC) considerations.
- 9.3 Prepare a contingency plan that will be implemented should the proposed Corrective Action Plan not meet its goals. A set of performance measures should be proposed that would be utilized to "trigger" the implementation of the contingency plan. For example, Natural Attenuation is proposed and a downgradient sentry well currently exhibits non-detectable concentrations of a contaminant. The "trigger" would be to activate the contingency plan should

- 1) well identification;
- 2) ground surface elevation;
- 3) surveyed top of casing/measuring point elevation;
- 4) screen length;
- 5) top and bottom of screen elevations;
- 6) top of filtered sand;
- 7) top of bentonite seal;
- 8) total depth of well;
- 9) static water level elevation;
- 10) date of static water level measurement;
- 11) soil classifications; and
- 12) geologist's notes/descriptions (i.e., visibly stained soil at 6-8', odor).

10.5 Well Purging Data

The following data collected during purging of wells for sampling must be included:

- 1) date purged;
- 2) odors, sheen or product present;
- 3) volumes purged;
- 4) purge volume or rate; and
- 5) parameter measurement values collected after each purge volume or rate (temperature, pH, conductivity, turbidity, dissolved O₂, etc. - successive parameter measurements should demonstrate stabilization prior to sample collection).

10.6 Ground Water Analytical Results

The following information must be included:

- 1) well identification;
- 2) date sampled;
- 3) target compounds;
- 4) concentrations of contaminants detected;
- 5) Method Detection Limit (MDL) for each compound; and
- 6) appropriate data validation qualifiers.

10.7 Comparison of Analytical Results to Regulatory Cleanup Values

Tabulate the results that exceed regulatory cleanup values separately for each media (soil, surface water, sediment, groundwater) investigated. Method Detection Limits (MDL) that exceed regulatory cleanup values must also be presented.

necessary, to make map legible; e.g., separate maps for monitoring well locations versus ground water survey probe locations. The map(s) must include North Arrow, Scale, and Map Source labels.

11.5 Potentiometric Surface Map

Include a Potentiometric Surface Map. Control points must be labeled. Data such as static water level elevations at control points must be depicted on the map. The map must include North Arrow, Scale, and Map Source labels.

11.6 Geologic Cross Sections

Include Geologic Cross Sections that show site stratigraphy through full depth of potentially impacted water-bearing units, including underlying confining layer. Prepare a minimum of two cross-sections per site (i.e., one parallel to groundwater flow direction and one perpendicular to flow direction). Indicate contaminant location, monitoring wells depicting their screened intervals, and subsurface conduits/piping, etc. depicting the subsurface of the property. The cross sections should be oriented longitudinally and transversely with respect to the orientation of soil and/or ground water contaminant plumes. The potentiometric surface should be depicted on the cross section. The map must include North Arrow, Scale, and Map Source and Contaminant Concentration Unit labels.

11.7 Soil Contamination Extent Maps

Include Isocontour maps of soil analytical data with, at a minimum, isocontours labeled for Restricted and Unrestricted contaminant concentration levels. The maps must be plan views and cross-sectional views of the site. The map must include North Arrow, Scale, and Map Source and Contaminant Concentration Unit labels.

11.8 Groundwater Contamination Isoconcentration Maps

Include Isoconcentration maps depicting the extent and degree of ground water contamination. It may be necessary to prepare an isocontour map for each contaminant, suite of contaminants, and total contamination. Include at least three isocontour labels for each contaminant. One of the isocontours must be the groundwater Target Remediation Goal for each contaminant. The map must include North Arrow, Scale, and Map Source and Contaminant Concentration Unit labels.

11.9 Separate Phase Product Isopach Map

- 12.8 Include pertinent correspondence such as communications with regulatory agencies relative to permitting, waste characterization and disposal, etc.
- 12.9 Photographs may be included such as photographs of property features, investigative activities, etc. Photographs are useful in providing additional documentation of the investigations conducted.
- 12.10 Original prints of historical areal photographs should be included, if available.
- 12.11 Include Field Equipment Calibration Verification. Provide certification for each piece of field equipment that was utilized which demonstrates that each piece was calibrated prior to being used.

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Document 4

BRUNINI, GRANTHAM, GROWER & HEWES, PLLC
ATTORNEYS AT LAW

TRUDY D. FISHER

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(1912-1986)

TELEPHONE: 601-948-3101
FACSIMILE: 601-960-6902

JOHN M. GROWER
OF COUNSEL

November 30, 1998

VIA HAND DELIVERY

Mr. Trey Hess, Environmental Engineer
Mississippi Department of Environmental Quality
Office of Pollution Control
101 W. Capitol Street
Jackson, Mississippi 39201

Re: Gulfport Fertilizer Plant Site



Dear Trey:

Enclosed is the Agreed Order which has been executed by Mr. A. J. Alfonso, Vice-President of Hancock Bank. As you know, we had previously submitted a check in the amount of \$6,500.00 to begin the expedited review process.

Please call me at 960-6846 if you need any further information.

Sincerely,

Brunini, Grantham, Grower & Hewes, PLLC


Trudy D. Fisher

TDF/age
Enclosure

BEFORE THE MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

In re: **Matter of Hancock Bank of Gulfport, Mississippi** Order No. _____
P.O. Box 4019
Gulfport, Mississippi 39502-4019

AGREED ORDER

The Mississippi Commission on Environmental Quality ("Commission"), the Mississippi Department of Environmental Quality ("MDEQ") and Hancock Bank of Gulfport, Mississippi, ("Hancock Bank") now enter the following agreement pursuant to the Uncontrolled Site Voluntary Evaluation Program ("Program") created in Miss. Code Ann. § 17-17-54(2) (Supp. 1997), as follows:

1. Hancock Bank is the owner of a former fertilizer plant site ("site") located in Gulfport, Mississippi. MDEQ has reason to believe that conditions exist at the site which warrant oversight by MDEQ. Hancock Bank has transmitted information regarding these conditions in the form of Site Characterization Report, dated November, 1998.
2. The site is an uncontrolled site within the purview of Miss. Code Ann. § 17-17-54. Hancock Bank desires to submit this site for participation in the Program. By this agreement, MDEQ accepts the site for participation in the Program.
3. Hancock Bank agrees to the following terms and conditions of participation in the Program:
 - (a) Hancock Bank will pay to MDEQ simultaneously with the execution of this document by Hancock Bank a non-refundable Program application fee of \$500.00
 - (b) Hancock Bank will pay all costs of MDEQ's actions associated with MDEQ's administration and evaluation of the site. For the first twelve months in which this Agreed Order is effective, these costs will be calculated at the rate of \$75.00 per hour for each hour of MDEQ project officer time spent reviewing, assessing, investigating, reporting on, taking administrative action in regard to, analyzing or studying the site or the information and plans regarding the site submitted by Hancock Bank, plus MDEQ's actual costs (above and beyond project officer time) for obtaining and analyzing split samples and additional samples deemed necessary by MDEQ. These

costs will also apply to project officer time spent conducting these duties prior to the issuance of this order, but not beginning before November 4, 1998. Analytical costs will be charged as shown on the relevant schedule of analytical costs, attached to this order as Appendix 1. MDEQ reserves the right to increase or decrease the per hour and analytical cost schedule at any time after the first twelve months in which this Agreed Order is effective. In case of such an increase or decrease, MDEQ will notify Hancock Bank in writing of the new cost schedule, and the new cost schedule will become effective forty-five days after the date of the written notice to Hancock Bank. If Hancock Bank determines to discontinue its participation in the Program for the site after a change by MDEQ in the per hour and analytical cost schedule, Hancock Bank may terminate its participation in the program as is stated in paragraph 9, below. MDEQ will send an invoice to Hancock Bank on a monthly basis stating the program costs assigned to the site that have not been paid prior to the date of invoice by Hancock Bank, and Hancock Bank will pay that amount to MDEQ, for deposit into the Uncontrolled Site Evaluation Trust Fund ("Fund"), within 30 days following the invoice date.

(c) Hancock Bank will pay to MDEQ simultaneously with the execution of this document by Hancock Bank an advance of the total to be paid to MDEQ pursuant to subsection 3(b) of this agreement in the amount of \$6,000.00. This amount will be deposited into the Fund to be used by MDEQ as payment of partial payment for the project costs charged to Hancock Bank in the first and last invoices sent by MDEQ to Hancock Bank. MDEQ will credit one half of this amount against the total first invoice amount billed to Hancock Bank. If a credit balance exists for Hancock Bank after deducting the first invoice amount from the first one half of the deposited amount, the remainder of the first one half of the deposited amount will be deducted from the second invoice amount, as so on, until the first one half of the deposited amount is exhausted. Hancock Bank will remain liable for the payment of all invoiced amounts described in subparagraph 3(b), above, in excess of the first one half of the deposited amount. At the completion of MDEQ's involvement with the project, the remaining one half of this amount will be credited against the final invoice sent by MDEQ to Hancock Bank. Hancock Bank will remain liable for the payment of all invoiced amounts described in subparagraph 3(b), above, in excess of the second one half of the deposited amount. Any deposited amount remaining after payment in full of the last project invoice will be refunded to Hancock Bank.

4. MDEQ will expedite review and evaluation of the investigative assessments,

work plans, remedial investigation plans, scopes of work, and remediation design plans submitted by Hancock Bank regarding the site.

5. Hancock Bank will obtain on behalf of MDEQ access to the site to be evaluated pursuant to this Agreed Order, whether the site to be evaluated is owned and/or operated by Hancock Bank or by a third party. If the site to be evaluated is owned or operated by a third party, Hancock Bank will provide to MDEQ within ten days of the execution of this Agreed Order by Hancock Bank a copy of a document assuring MDEQ site access for the remainder of MDEQ's involvement with this site.
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8. MDEQ may suspend immediately any activities or actions related to the administration or evaluation of the uncontrolled site or sites that are the subject of this agreement if Hancock Bank fails to meet any condition or requirement of or violates any of the following: (1) This agreed order or any other order of the Commission pertaining to the site to be evaluated pursuant to this Agreed Order; (2) Miss. Code Ann. § 17-17-54 (Supp. 1996); (3) any rule or regulation promulgated by the Commission, or (4) any permit issued by the Mississippi Environmental Quality Permit Board.
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Hancock Bank Agreed Order
Page No. 4

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SO AGREED AND ORDERED, this the _____ day of _____, 1998.

J. I. Palmer, Jr.
Executive Director
Mississippi Commission on
Environmental Quality

AGREED, this the 25th day of Nov., 1998.

BY: _____

TITLE: _____

Hancock Bank

STATE OF Mississippi

COUNTY OR PARISH OF Harrison

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named A J Alfensu who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the Vice President of Hancock Bank and is authorized by that Corporation to sign this Agreement and to enter this Agreement on behalf of Hancock Bank.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 25th day of November, 1998.

Anneth M. Olsen

NOTARY PUBLIC

MY COMMISSION EXPIRES:

2/28/99



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

November 19, 1998

FILE COPY

CERTIFIED MAIL NO. Z039740195 RETURN RECEIPT REQUESTED

Mr. Andy Alfonso
Hancock Bank of Gulfport, Mississippi
P.O. Box 4019
Gulfport, Mississippi 39502-4019

RE: Former Gulfport Fertilizer Plant, Gulfport, Mississippi
Enclosed Agreement Between Hancock Bank and Mississippi Commission on
Environmental Quality

Dear Mr. Alfonso:

The enclosed agreement is proposed in response to a request by you to participate in the Uncontrolled Site Voluntary Evaluation Program created by Miss. Code Ann. §17-17-54. The Mississippi Department of Environmental Quality (MDEQ) accepts the referenced site into the Uncontrolled Site Voluntary Evaluation Program upon our receipt of the Agreed Order, executed by the appropriate authorized individual.

MDEQ is currently reviewing the Site Characterization Report prepared by Butler Services of Mississippi, Inc. dated November, 1998. In order to continue the review, MDEQ requires a copy of the preliminary subsurface investigation conducted by Covington and Associates Corporation. Also, the report does not appear to address all sections of the DRAFT Brownfields Site Characterization Report and Corrective Action Plan Format. In order to receive an expedited review, all items must be addressed.

The required MDEQ oversight work on your site will continue once we receive each of the items aforementioned. Please call me if you need anything else. My phone number is (601) 961-5654.

Sincerely,

Jere "Trey" Hess, P.E.
Acting Chief, Brownfields Section

Enclosures

Gulfport Fertilizer Plant Site Acceptance Letter_11-19-98 (dpt).wpd

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289-0385 Phone 601.961.5171 Fax 601.354.6612

BEFORE THE MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

In re: Matter of Hancock Bank of Gulfport, Mississippi

Order No. _____

P.O. Box 4019

Gulfport, Mississippi 39502-4019

AGREED ORDER

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1. Hancock Bank is the owner of a former fertilizer plant site ("site") located in Gulfport, Mississippi. MDEQ has reason to believe that conditions exist at the site which warrant oversight by MDEQ. Hancock Bank has transmitted information regarding these conditions in the form of Site Characterization Report, dated November, 1998.
2. The site is an uncontrolled site within the purview of Miss. Code Ann. § 17-17-54. Hancock Bank desires to submit this site for participation in the Program. By this agreement, MDEQ accepts the site for participation in the Program.
3. Hancock Bank agrees to the following terms and conditions of participation in the Program:
 - (a) Hancock Bank will pay to MDEQ simultaneously with the execution of this document by Hancock Bank a non-refundable Program application fee of \$500.00
 - (b) Hancock Bank will pay all costs of MDEQ's actions associated with MDEQ's administration and evaluation of the site. For the first twelve months in which this Agreed Order is effective, these costs will be calculated at the rate of \$75.00 per hour for each hour of MDEQ project officer time spent reviewing, assessing, investigating, reporting on, taking administrative action in regard to, analyzing or studying the site or the information and plans regarding the site submitted by Hancock Bank, plus MDEQ's actual costs (above and beyond project officer time) for obtaining and analyzing split samples and additional samples deemed necessary by MDEQ. These

Hancock Bank Agreed Order
Page No. 2

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Hancock Bank Agreed Order
Page No. 3

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6. This agreement is not entered in lieu of any penalty or enforcement action that MDEQ or the Commission may otherwise take in regard to the site or against Hancock Bank. MDEQ and the Commission reserve the right to take any and all administrative and/or legal actions they deem necessary in regard to the site and/or against Hancock Bank. This agreement does not represent the settlement or release of any liability of Hancock Bank for any action, inaction or property condition. Hancock Bank neither admits nor denies liability regarding the environmental condition of the site. MDEQ accepts no responsibility by entering this agreement for activity taken at the site or for the past, present or future condition of or contamination present at the site.

7. If any part of any amount invoiced to Hancock Bank by MDEQ under this agreement is not paid within thirty days after the due date (sixty days after the date of the invoice), a penalty of up to twenty-five percent of the amount due may be imposed by further order of the Commission and added thereto pursuant to Miss. Code Ann. § 17-17-54(4). If MDEQ is required to pursue legal action to collect fees incurred, reasonable attorneys' fees and costs may be assessed against the nonpaying party.

8. MDEQ may suspend immediately any activities or actions related to the administration or evaluation of the uncontrolled site or sites that are the subject of this agreement if Hancock Bank fails to meet any condition or requirement of or violates any of the following: (1) This agreed order or any other order of the Commission pertaining to the site to be evaluated pursuant to this Agreed Order; (2) Miss. Code Ann. § 17-17-54 (Supp. 1996); (3) any rule or regulation promulgated by the Commission, or (4) any permit issued by the Mississippi Environmental Quality Permit Board.

9. Either Hancock Bank or MDEQ may terminate this agreement upon thirty days prior written notice to the other party. The effective date of the termination will be the thirtieth day after receipt by either party of a written notification of termination. Within thirty days of the effective date of termination, MDEQ will

Hancock Bank Agreed Order
Page No. 4

deliver to Hancock Bank an invoice for all work accomplished prior to the effective date of termination for which Hancock Bank previously has not remitted payment. Hancock Bank will pay the invoice amount to MDEQ, for deposit into the Uncontrolled Site Evaluation Trust Fund ("Fund"), within 30 days following the invoice date. As of the effective date of termination, MDEQ will cease the expedited review of the site, and MDEQ thereafter will determine whether and when to resume review of site information within the normal time frame of the MDEQ uncontrolled sites program.

SO AGREED AND ORDERED, this the _____ day of _____, 1998.

J. I. Palmer, Jr.
Executive Director
Mississippi Commission on
Environmental Quality

AGREED, this the _____ day of _____, 1998.

BY: _____

TITLE: _____
Hancock Bank

STATE OF _____

COUNTY OR PARISH OF _____

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named _____ who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the _____ of Hancock Bank and is authorized by that Corporation to sign this Agreement and to enter this Agreement on behalf of Hancock Bank.

SWORN TO AND SUBSCRIBED BEFORE ME, this the _____ day of _____, 1998.

NOTARY PUBLIC

MY COMMISSION EXPIRES:

BRUNINI, GRANTHAM, GROWER & HEWES, PLLC
ATTORNEYS AT LAW

TRUDY D. FISHER

1400 TRUSTMARK BUILDING / 248 EAST CAPITOL STREET
JACKSON, MISSISSIPPI 39201

EDMUND L. BRUNINI
(1911-1992)

DIRECT: 601-960-6846
E-MAIL: tfisher@brunini.com

POST OFFICE DRAWER 119
JACKSON, MISSISSIPPI 39205

R. GORDON GRANTHAM
(1912-1986)

TELEPHONE: 601-948-3101
FACSIMILE: 601-960-6902

JOHN M. GROWER
OF COUNSEL

November 12, 1998



Mr. Trey Hess
Mississippi Department of Environmental Quality
101 Capitol Centre
Jackson, Mississippi 39289-0385

HAND DELIVER

Re: Gulfport Fertilizer Company Site
Gulfport, Mississippi
Harrison County

Dear Trey :

The purpose of this letter is to request that the Gulfport Fertilizer Company Site, located in Gulfport, Mississippi, be included in the Uncontrolled Site Voluntary Evaluation Program (VEP), pursuant to Section 17-17-54 of Mississippi Code Annotated. Enclosed you will find the following items:

- (1) Report of findings entitled "Site Characterization Report, Proposed Leased Parcel (7.9 acres) Former Gulfport Fertilizer Company, 33rd Street, Gulfport, Mississippi" which will provide you with technical information pertaining to the characterization of the site;
- (2) Application for participation in the VEP and;
- (3) Check number 0172541 from Hancock Bank made payable to the Department of Environmental Quality in the amount of \$6,500.00.

Hancock Bank acquired the Gulfport Fertilizer Company Site through foreclosure in 1982, and this 33.06 acre site has remained idle since foreclosure. The history of the site prior to Hancock Bank's foreclosure is discussed in detail in the enclosed Report. Hancock Bank has an opportunity to lease an approximate 7.9 acre parcel of the 33.06 site, if all issues can be addressed within the next month. It is the intent of Hancock Bank to address the minor contamination on the 7.9 acre parcel, as indicated in the enclosed Report, so that it can immediately lease this portion of the property. The remaining acreage of the 33.06 acre site will be addressed by Hancock Bank in accordance with a reasonable schedule to be determined at a later time.

Mr. Trey Hess
November 12, 1998
Page 2

It is understood that we will need to sign an agreed order with the Mississippi Department of Environmental Quality. In order to speed the processing of that agreed order, you should address this order to:

Trudy D. Fisher
Brunini, Grantham, Grower & Hewes, PLLC
1400 Trustmark Building
248 East Capitol Street
Jackson, Mississippi 39205
Phone Number: 601-960-6846
Fax Number: 601-960-6902

As we discussed by telephone today, please call me when the Agreed Order is ready and we will pick it up to save time in execution of the Order.

Several representatives for the Bank, including myself, met with you and other staff members to discuss participating in the Brownfields Program. While we do not want to hold up staff review of the 7.9 acre parcel waiting for the Brownfields Regulations to become effective, Hancock Bank is leaving open the option of participating in the Brownfields Program for the remaining portion of the 33.06 acre site. We understood from our meeting with you and the other staff members that if we submitted this request and accompanying documentation to you this week, we could receive a quick response in light of the "window of opportunity" you described to us in our meeting.

Should you have any questions or comments concerning this matter, please contact Louis Fortenberry or Denton Bates with Butler Services of Mississippi, Inc. at 228-769-6983 or myself at 601-960-6846.

Sincerely,

Brunini, Grantham, Grower & Hewes, PLLC



Trudy D. Fisher

TDF/age

Enclosure

cc: Joy Phillips (w/o encl.)
Louis Fortenberry (w/o encl.)

Uncontrolled Site Voluntary Evaluation Program §17-17-54 Application Form

Facility or Site Data

Site Name	Gulfport Fertilizer Company				
Owner of Site	Hancock Bank of Gulfport, Mississippi				
Address of Site (Street)	33rd Street				
City of Site	Gulfport	State	MS	Zip	
County	Harrison				
Contact Person for Site	Andy Alfonso	Phone	601-868-4594	Fax	
Mailing Address	P.O. Box 4019				
City	Gulfport	State	MS	Zip	39502-4019
Soil Contaminant	Lead, Arsenic	Surface Water Contaminant		N/A	
Ground Water Contaminant	Lead, Arsenic	Air Contaminant		N/A	
Latitude (Field Verified)*	30 ° 23 ' 42 . 00 "	Longitude (Field Verified)*	89 ° 06 ' 48 . 00 "		

*Location of Highest Concentration of Contamination in Degrees, Minutes, and Seconds to 2 decimal places (i.e., 33° 53' 21.55")

Party Assuming Responsibility for MDEQ Oversight Costs

Name	Hancock Bank of Gulfport, Mississippi				
Address (Street and P.O. Box)	P.O. Box 4019				
City	Gulfport	State	MS	Zip	39502-4019
Contact Person	Andy Alfonso	Phone	601-868-4594	Fax	
Relationship to Site, (i.e., Owner, Lessee, Potential Buyer, Seller)	Vice-President - Other Real Estate				

Financial Contact (for Payment of MDEQ Invoice)

Firm	Hancock Bank of Gulfport, Mississippi				
Address for Invoice	P. O. Box 4019, Gulfport, Mississippi 39502-4019				
City	Gulfport	State	MS	Zip	39502-4019
Contact Person	Andy Alfonso	Phone	601-868-4594	Fax	

Environmental Consultant

Firm	Butler Services of Mississippi, Inc.				
Address	P.O. Box 1164				
City	Pascagoula	State	MS	Zip	39568-1164
Contact Person	Denton Bates	Phone	228-769-6983	Fax	228-769-1219

Legal Counsel

Firm's Name	Brunini, Grantham, Grower & Hewes, PLLC				
Address	1400 Trustmark Building, 248 East Capitol Street				
City	Jackson	State	MS	Zip	39201
Contact Attorney	Trudy D. Fisher	Phone	601-960-6846	Fax	601-960-6902

Please Print or Type Responses

Form Revision Date 3/12/97

GULFPORT
FERTILIZER
SITE

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No.0172541

HANCOCK BANK \$6,500dols00cts

DATE

AMOUNT

11/09/98

****6,500.00

PAY TO THE ORDER OF: DEPARTMENT OF ENVIRONMENT QUALITY

OFFICIAL EXPENSE CHECK
FOR VICE PRESIDENT-COMPTROLLER

⑈0172541⑈ ⑆065503681⑆ 01 0129100⑈

George A. Schlegel





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

MEMORANDUM

TO: Tony Russell, Chief
Uncontrolled Sites Section

FROM: Jere 'Trey' Hess, P.E. *JH*
Brownfields Section

DATE: November 9, 1998

SUBJECT: Gulfport Fertilizer Site
11/04/98 Meeting
101 Capitol Centre

On November 4, 1998, Russell Smith, Betty Ruth Fox, and I met with parties interested in a property transfer involving the former Gulfport Fertilizer site in Harrison County. Ms. Joy Phillips of Allen, Vaughn, Cobb & Hood, represented the Bank of Hancock who foreclosed on the property in 1982. Their consulting firm, Butler Services, was represented by Mr. Denton Bates and Mr. Louis Fortenberry. Trudy Fisher, of Brunini, Grantham, Grower, & Hewes, was also present.

The site is located near Gulfport and was primarily used as a fertilizer site for many years until 1982. For approximately five years at that time the site operated as a Cement Company. A prospective purchaser wishes to expedite the review of environmental concerns and wants to lease a portion of the site prior to purchasing all of the site. The area that they wish to lease will be used for off-loading rock aggregate from railcars and storing on-site for delivery later. The area that they wish to lease does not APPEAR to be significantly impacted by past activities. There is one small area where there APPEARS to be some limited Arsenic and Lead contamination in the soil. The lease area is approximately 7.9 acres near the railroad line.

On the remaining 25.1 acres, the former Gulfport Fertilizer facility is located. Preliminary assessments concluded that Arsenic and Lead are present at elevated levels in both soils and groundwater. Two wells were installed some time ago and remain onsite, but Butler Services could not find any installation data for the 4 inch

Memorandum: Gulfport Fertilizer Site Meeting 11/04/98
November 9, 1998
Page 2 of 2

wells. The information also APPEARS to indicate that groundwater impact is confined within the property boundaries. The topographic map indicates that a marshy area is located north-northwest of the impacted area and that residences APPEAR to be within a two mile radius, roughly, but not directly adjacent.

Hancock Bank proposes to immediately address the areas of concern on the area to be leased and then expand the site characterization to the actual former facility and the impacted areas in and around it. I presented them with a Voluntary Evaluation Program (VEP) Packet and explained its sections. I explained that in order to get the expedited review that they want, the VEP is ideal for their plans. I also emphasized that we must receive a letter in writing from them requesting to be accepted into the VEP and that it would be a good idea to submit the Application at that time as well. I also presented them with the DRAFT Brownfields Site Characterization Work Plan, Reports and Corrective Action Plan Formats. I explained that all Brownfields documents are soon to be presented for public comment and that the DRAFT formats may change, but that I did not envision them changing substantially. I emphasized the importance of presenting a COMPLETE site characterization in a standardized format so that we could expedite the process. In addition, by conforming to the Brownfields formats, they would be moving in the right direction to join the Brownfields Program, should they desire. They expressed some interest in the Brownfields Program. The meeting ended soon thereafter.

11/4/98 1:30 PM

101 CAPITOL CENTRE

HARRISON COUNTY

FORMER

V GULF PORT FERTILIZER SITE

PROPERTY OWNED - BANK OF HANCOCK IN 1982

1995 - PRELIMINARY ASSESSMENT ACTIVITY

LEAD -

ARSENIC -

HISTORY

~~E~~

33 ACRES

COVINGTON & ASSOC. - SAMPLED

BUTLER SVS. 18" + 24" DEPTH -

FAILED TCLP

7.9 ACRES TO EAST DIVIDED OFF

EXCAVATE TO 15' DEEP

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 12/05/02
		Time collected: 11:04
		Sample Collector: PJOHNSTON
Sample ID: AA14266		To Lab: SV
Facility Name: GULFPORT FERTILIZER SITE		Sample Type: GROUNDWA
Site ID: C0470149		Received By: TAMMY SAWYER
Location ID:		Date Received: 12/06/02
Sampling Loc: MW-1		Time Received: 7:57
Discharge No.		Project: 4047
Permit No:	Other No: MW-1	Study: COMPLIANCE
Lat:	Long:	Reporting Date: 01/16/03
	County: 047 HARRIS	
Sample Level:	QA Type:	

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic, Total (ug/L as AS)	ICP 200.7	23.4	ug/L	2.2	GB	01/08/03	01/08/03
Lead, Total (ug/L as PB)	ICP 200.7	22.1	ug/L	2.1	GB	01/08/03	01/08/03

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:

ENVIRONMENT CONDITION: OVERCAST,
WINDY, COLD (APPROX. 38 DEGREES)
DRINKING WATER STANDARDS

Approved By: 

FILE COPY

Invoice

Invoice Number:
Date: September 13, 2002

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 14266	40.00	40.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 14266	23.00	23.00
SUBTOTAL			63.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$63.00

E-mailed to Suzanne Polander 1-27-03

FILE COPY

Sample I.D. **AA14266**

Location code **C0470149**

Location Description **GULFPORT FERTILIZER SITE**

Sample collector **PJOHNSTON**

Collection date: **12/05/2002**

Lab submittal date: **12/06/2002**

Due date: **12/06/2002**

Matrix: **GROUNDWA**

Login record file: **12060800**

Collection time: **11:04**

Lab submittal time: **07:57**

Division Code: **4047**

Basin _____

Permit_No _____

Discharge_No _____

Storet_No _____

Other_No **MW-1**

Sample_Location **MW-1**

County_Code **047 HARRISON**

Requested_By **P. JOHNSTON**

Analyses ordered

Method

Due Date

Lead, Total (ug/L as PB)

ICP 200.7

01/02/2003

Arsenic, Total (ug/L as AS)

ICP 200.7

01/02/2003

Please refer to the indicated sample I.D. numbers when making inquiries.

Received by: _____

FILE COPY



MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

CHAIN OF CUSTODY RECORD

POLLUTION CONTROL
LABORATORY
121 Fairmont Plaza
Pearl, Mississippi 39208

PROJECT NAME

LOCATION

SAMPLE TYPES

1. SURFACE WATER
2. GROUND WATER
3. POTABLE WATER
4. WASTEWATER
5. LEACHATE
6. SOIL/SEDIMENT
7. SLUDGE
8. WASTE
9. AIR
10. FISH
11. OTHER

SITE NO.

SAMPLE TYPE

DATE

TIME

COMP
GRAB

STATION LOCATION/DESCRIPTION

SHIPPED TO:

DATA TO:

CIRCLE/ADD
parameter
desired. List
no. of con-
tainers
submit-
ted.

ANALYSIS

- COD, TOC, NUTRIENTS
- BOD, SOLIDS
- METALS (Total) (TCLP)
- EXT. ORG/PESTICIDES (TCLP)
- PURG. AROMATICS/
HALOCARBONS
- CYANIDE
- FECAL COLIFORM
- Oil & Grease/TPH
- Phenolics
- LEAD
- ARSENIC

REMARKS

LAB
USE
ONLY

FILE COPY

Ambient Temperature
40°C

*Drinking Water
standards

RELINQUISHED BY:

DATE/TIME

RECEIVED BY:

RELINQUISHED BY:

DATE/TIME

RECEIVED BY:

RELINQUISHED BY:

DATE/TIME

RECEIVED BY:

RELINQUISHED BY:

DATE/TIME

RECEIVED BY:

(SIGN)

(SIGN)

(SIGN)

(SIGN)

NOTICE: Must use a separate form for each ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

PAGE 1 OF 1

3/91

3047



MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

CHAIN OF CUSTODY RECORD

POLLUTION CONTROL
LABORATORY
121 Fairmont Plaza
Pearl, Mississippi 39208

PROJECT NAME

LOCATION

SAMPLE TYPES

1. SURFACE WATER
2. GROUND WATER
3. POTABLE WATER
4. WASTEWATER
5. LEACHATE
6. SOLID WASTE
7. SLUDGE
8. WASTE
9. AIR
10. FISH
11. OTHER

SAMPLE #S (SIGN)

A. Penny Johnston

B. John Szabo

C.

D.

STATION LOCATION/DESCRIPTION

MW-01

SHIPPED TO:

DATA TO:

P. Johnston

ANALYSIS

CIRCLE/ADD	parameter desired. List no. of containers submitted.
BOD, TOC, NUTRIENTS	
BOD, SOLIDS	
METALS (Total) (TCLP)	
EXT. ORG/PEST/PCBs (TCLP)	
PURG. AROMATICS/ HALOCARBONS	
CYANIDE	
FECAL COLIFORM	
Oil & Grease/TPH	
Phenolics	
LEAD	
ARSENIC	

REMARKS

LAB
USE
ONLY

FILE COPY

Asador Henriquez
400

*Drinking Water Standards

RELINQUISHED BY:

(PRINT) Penny Johnston

DATE/TIME 12-6-02

RECEIVED BY:

(PRINT) Penny Johnston

RELINQUISHED BY:

(PRINT)

DATE/TIME

RECEIVED BY:

(PRINT)

RELINQUISHED BY:

(PRINT)

DATE/TIME 0751

RECEIVED BY:

(PRINT)

RELINQUISHED BY:

(PRINT)

DATE/TIME

RECEIVED BY:

(PRINT)

(SIGN)

(SIGN)

(SIGN)

(SIGN)

NOTICE: Must use a separate form for each ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

PAGE 1 OF 3/91

3047

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 06/06/02
		Time collected: 10:22
		Sample Collector: JOHNSTON.SZABO
Sample ID: AA12634	To Lab: SV	
Facility Name: GULFPORT FERTILIZER SITE	Sample Type: SOIL SED	
Site ID: C0470145	Received By: TAMMY SAWYER	
Location ID:	Date Received: 06/07/02	
Sampling Loc: SOIL BORING LOCATION 0S-18 DEPTH 2'-4'	Time Received: 0825	
Discharge No.	Project: 3853	
Permit No:	Study: COMPLIANCE	
Lat:	Reporting Date: 07/10/02	
Long:		
Other No: 0S-18 2'-4'		
County: 047		
Sample Level:	QA Type:	

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic in Soil	ICP 200.7	1.00	ug/g	0.5	GB	06/18/02	06/18/02
Lead in Soil	ICP 200.7	4.3	ug/g	0.5	GB	06/18/02	06/18/02
WET							
Percent Solid in Soil		85	%		KF	06/10/02	06/11/02

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:

FILE COPY

Approved

Phil

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 06/06/2002 Time collected: 13:00
Sample ID: AA12635 Facility Name: GULFPORT FERTILIZER SITE Site ID: C0470146 Location ID: Sampling Loc: STREAM SED. SAMPLE LOC 3 DEPTH 0'-1' Discharge No. Permit No: Lat: Long: Other No: SS-3 0'-1' County 047 Sample Level: QA Type:		Sample Collector: JOHNSTON.SZABO To Lab: SV Sample Type: SOIL SED Received By: TAMMY SAWYER Date Received: 06/07/2002 Time Received: 8:25 Project: 3853 Study: COMPLIANCE Reporting Date: 08/06/2002

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic in Soil	ICP 200.7	2.50	ug/g	0.5	GB	06/18/2002	06/18/2002
Lead in Soil	ICP 200.7	33.0	ug/g	0.5	GB	06/18/2002	06/18/2002
WET							
Percent Solid in Soil		80	%		KF	06/10/2002	06/11/2002

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:

ENVIRONMENT CONDITION: WARM, SUNNY
(~ 90 DEGREES)

Approved By: 

FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 06/06/2002 Time collected: 13:00
Sample ID: AA12636 Facility Name: GULFPORT FERTILIZER SITE Site ID: C0470147 Location ID: Sampling Loc: STREAM SED. SAMPLE LOC 3 DEPTH 1'-2' Discharge No. Permit No: Lat: Long: Other No: SS-3 1'-2' County 047 Sample Level: QA Type:		Sample Collector: JOHNSTON, SZABO To Lab: SV Sample Type: SOIL SED Received By: TAMMY SAWYER Date Received: 06/07/2002 Time Received: 8:25 Project: 3853 Study: COMPLIANCE Reporting Date: 08/06/2002

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic in Soil	ICP 200.7	0.60	ug/g	0.5	GB	06/18/2002	06/18/2002
Lead in Soil	ICP 200.7	5.0	ug/g	0.5	GB	06/18/2002	06/18/2002
WET							
Percent Solid in Soil		86	%		KF	06/10/2002	06/11/2002

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
Z: surrogate

SAMPLE COMMENTS:

ENVIRONMENT CONDITION: WARM, SUNNY
(~ 90 DEGREES)

Approved By: 

FILE COPY

Invoice

Invoice Number:
Date: June 7, 2002

FILE COPY

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To: DEPARTMENT OF ENVIRONMENTAL QUALITY UNCONTROLLED SITES SECTION VOLUNTARY EVALUATION PROGRAM P. O. BOX 10385 JACKSON, MS 39289	Ship to (if different address): DEPARTMENT OF ENVIRONMENTAL QUALITY UNCONTROLLED SITES SECTION VOLUNTARY EVALUATION PROGRAM 2380 HWY 80 WEST JACKSON, MS 39204
---	--

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 12634 - 12636	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 12634	40.00	40.00
2	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 12635 - 12636	30.00	60.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 12634	23.00	23.00
2	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 12635 - 12636	17.00	34.00
3	TOTAL SOLIDS SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 12634 - 12636	15.00	45.00
SUBTOTAL			227.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$227.00

E-mailed to Suzanne Polander 9-30-02

Sample Receipt

Mississippi DEQ/OPC Laboratory

Sample I.D. AA12634

Location code **C0470145**

Location Description **GULFPORT FERTILIZER SITE**

Sample collector **JOHNSTON.SZABO**

Collection date: **12/30/1899**

Lab submittal date: **06/07/2020**

Due date: **06/07/2020**

Matrix: **SOIL SED**

Login record file: **06070845**

Collection time: **10:22**

Lab submittal time: **00:00**

Division Code: **3853**

Basin _____

Permit_No _____

Discharge_No _____

Storet_No _____

Other_No **0S-18 2'-4'**

Sample_Location **SOIL BORING LOCATION 0S-18 DEPTH 2'-4'**

County_Code **047**

Requested_By **PENNY JOHNSTON**

Analyses ordered

Lead in Soil

Total Solids

Arsenic in Soil

Method

ICP 200.7

EPA 160.3

ICP 200.7

Due Date

07/05/2020

06/14/2020

07/05/2020

Sample I.D. AA12635

Location code **C0470146**

Location Description **GULFPORT FERTILIZER SITE**

Sample collector **JOHNSTON.SZABO**

Collection date: **12/30/1899**

Lab submittal date: **06/07/2020**

Due date: **06/07/2020**

Matrix: **SOIL SED**

Login record file: **06070845**

Collection time: **13:00**

Lab submittal time: **00:00**

Division Code: **3853**

Basin _____

Permit_No _____

Discharge_No _____

Storet_No _____

Other_No **SS-3 0'-1'**

Sample_Location **STREAM SED.SAMPLE LOC 3 DEPTH 0'-1'**

County_Code **047**

Requested_By **PENNY JOHNSTON**

FILE COPY

Analyses ordered

Lead in Soil

Total Solids

Arsenic in Soil

Method

ICP 200.7

EPA 160.3

ICP 200.7

Due Date

07/05/2020

06/14/2020

07/05/2020

Sample I.D. **AA12636**

Location code **C0470147**

Location Description **GULFPORT FERTILIZER SITE**

Sample collector **JOHNSTON.SZABO**

Collection date: **12/30/1899**

Lab submittal date: **06/07/2020**

Due date: **06/07/2020**

Matrix: **SOIL SED**

Login record file: **06070845**

Collection time: **13:00**

Lab submittal time: **00:00**

Division Code: **3853**

Basin _____

Permit_No _____

Discharge_No _____

Storet_No _____

Other_No **SS-3 1'-2'**

Sample_Location **STREAM SED.SAMPLE LOC 3 DEPTH 1'-2'**

County_Code **047**

Requested_By **PENNY JOHNSTON**

Analyses ordered

Method

Due Date

Lead in Soil

ICP 200.7

07/05/2020

Arsenic in Soil

ICP 200.7

07/05/2020

Total Solids

EPA 160.3

06/14/2020

Please refer to the indicated sample I.D. numbers when making inquiries.

Received by: _____

FILE COPY



CHAIN OF CUSTODY RECORD

MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY[illegible]

NOTICE: Must use a separate form for each Ice chest.



CHAIN OF CUSTODY RECORD

MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY[illegible]

NOTICE: Must use a separate form for each Ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

Lab Bench No.

FILE COPY

12634

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 09/12/02 Time collected: 10:50
Sample ID: AA13613 Facility Name: GULFPORT FERTILIZER SITE Site ID: C0470150 Location ID: Sampling Loc: MW-7 Discharge No. Permit No: Lat: Long: Other No: County: 047 Sample Level: QA Type:		Sample Collector: P. JOHNSTON To Lab: SV Sample Type: GROUNDWA Received By: BEVERLY ADKISON Date Received: 09/12/02 Time Received: 16:00 Project: 4047 Study: COMPLIANCE Reporting Date: 09/30/02

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic, Total (ug/L as AS)	ICP 200.7	ND	ug/L	2.5	JC	09/20/02	09/20/02
Lead, Total (ug/L as PB)	ICP 200.7	9.0	ug/L	2.4	JC	09/20/02	09/20/02

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:
NO FIELD FLOW

Approved By: 

FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENT & QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 09/12/02 Time collected: 11:20
Sample ID: AA13612 Facility Name: GULFPORT FERTILIZER SITE Site ID: C0470149 Location ID: Sampling Loc: MW-1 Discharge No. Permit No: Lat: Long: Other No: County: 047 Sample Level: QA Type:		Sample Collector: P. JOHNSTON To Lab: SV Sample Type: GROUNDWA Received By: BEVERLY ADKISON Date Received: 09/12/02 Time Received: 16:00 Project: 4047 Study: COMPLIANCE Reporting Date: 09/23/02

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic, Total (ug/L as AS)	ICP 200.7	ND	ug/L	2.5	JC	09/20/02	09/20/02
Lead, Total (ug/L as PB)	ICP 200.7	10.4	ug/L	2.4	JC	09/20/02	09/20/02

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:

NO FIELD FLOW

Approved By: 

FILE COPY

Invoice

Invoice Number:
Date: September 13, 2002

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 13612	40.00	40.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Numbers 13613	30.00	30.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 13612	23.00	23.00
1	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 13613	17.00	17.00
SUBTOTAL			110.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$110.00

E-mailed to Suzanne Polander 9-13-02

FILE COPY



CHAIN OF CUSTODY RECORD

MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY[illegible]

NOTICE: Must use a separate form for each Ice chest.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 2/19/02 Time collected: 12:05	
Sample ID: AA11435 Facility Name: GULFPORT FERTILIZER SITE Site ID: C0470116 Location ID: Sampling Loc: SOIL BORING P1 S15, 0'-2' DEPTH Discharge No. Permit No: Other No: P1 S15, 0'-2' Lat: Long: County: 047 Sample Level: QA Type:		Sample Collector: J.S.	
		To Lab: SV	
		Sample Type: SOIL/SED	
		Received By: TAMMY SAWYER	
		Date Received: 02/21/02	
		Time Received: 0945	
		Project: 3853	
		Study: COMPLIANCE	
		Reporting Date: 3/15/02	

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic in Soil	ICP 200.7	14.2	ug/g	0.5	JC	3/4/02	3/4/02
Lead in Soil	ICP 200.7	3,332	ug/g	0.5	JC	3/4/02	3/4/02
WET							
%solids		82.4	%		KF	2/25/02	2/26/02
pH 9045 in Soil	EPA 9045	4.31	Std. units	0.1	KF	2/22/02	2/22/02

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:

PLEASE CALL WITH RESULTS

Approved By:



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 2/19/02 Time collected: 12:15	
Sample ID: AA11436 Facility Name: GULFPORT FERTILIZER SITE Site ID: C0470117 Location ID: Sampling Loc: SOIL BORING P1 S15, 2'-4' DEPTH Discharge No. Permit No: Other No: P1 S15, 2'-4' Lat: Long: County: 047 Sample Level: QA Type:		Sample Collector: J.S. To Lab: SV Sample Type: SOIL/SED Received By: TAMMY SAWYER Date Received: 02/21/02 Time Received: 0945 Project: 3853 Study: COMPLIANCE Reporting Date: 3/15/02	

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic in Soil	ICP 200.7	11.0	ug/g	0.5	JC	3/4/02	3/4/02
Lead in Soil	ICP 200.7	32.0	ug/g	0.5	JC	3/4/02	3/4/02
WET							
%solids		87.2	%		KF	2/25/02	2/26/02
pH 9045 in Soil	EPA 9045	4.16	Std. units	0.1	KF	2/22/02	2/22/02

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:

PLEASE CALL WITH RESULTS

Approved By: 

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON	Date Collected: 2/19/02 Time collected: 11:35
Sample ID: AA11433 Facility Name: GULFPORT FERTILIZER SITE Site ID: C0470114 Location ID: Sampling Loc: SOIL BORING P1 S17, 0'-2' DEPTH Discharge No. Permit No: Other No: P1 S17, 0'-2' Lat: Long: County: 047 Sample Level: QA Type:	Sample Collector: J.S. To Lab: SV Sample Type: SOIL/SED Received By: TAMMY SAWYER Date Received: 02/21/02 Time Received: 0945 Project: 3853 Study: COMPLIANCE Reporting Date: 3/15/02

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
METALS							
Arsenic in Soil	ICP 200.7	17.4	ug/g	0.5	JC	3/4/02	3/4/02
Lead in Soil	ICP 200.7	47.4	ug/g	0.5	JC	3/4/02	3/4/02
WET							
%solids		89.3	%		KF	2/25/02	2/26/02
pH 9045 in Soil	EPA 9045	7.12	Std. units	0.1	KF	2/22/02	2/22/02

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:

PLEASE CALL WITH RESULTS

Approved: 

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control Laboratory
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

MONITORING REPORT

To: PENNY JOHNSTON		Date Collected: 2/19/02 Time collected: 11:45	
Sample ID: AA11434 Facility Name: GULFPORT FERTILIZER SITE Site ID: C0470115 Location ID: Sampling Loc: SOIL BORING P1 S17, 2'-4' DEPTH Discharge No. Permit No: Other No: P1 S17, 2'-4' Lat: Long: County: 047 Sample Level: QA Type:		Sample Collector: J.S.	
		To Lab: SV	
		Sample Type: SOIL/SED	
		Received By: TAMMY SAWYER	
		Date Received: 02/21/02	
		Time Received: 0945	
		Project: 3853	
		Study: COMPLIANCE	
		Reporting Date: 3/15/02	

ANALYTE	EPA METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS	ANALYSIS
						START DATE	END DATE
METALS							
Arsenic In Soil	ICP 200.7	95.0	ug/g	0.5	JC	3/4/02	3/4/02
Lead in Soil	ICP 200.7	5.0	ug/g	0.5	JC	3/4/02	3/4/02
WET							
%solids		84.5	%		KF	2/25/02	2/26/02
pH 9045 in Soil	EPA 9045	6.58	Std. units	0.1	KF	2/22/02	2/22/02

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/kilogram
ug/kg: micrograms/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

SAMPLE COMMENTS:

PLEASE CALL WITH RESULTS

Approved By:



Invoice

Invoice Number:
Date: February 22, 2002

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 11433 - 11436	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 11433	40.00	40.00
3	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 11434 - 11436	30.00	90.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 11433	23.00	23.00
3	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 11434 - 11436	17.00	51.00
4	pH SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 11433 - 11436	10.00	40.00
4	TOTAL SOLIDS SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 11433 - 11436	15.00	60.00
SUBTOTAL			329.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$329.00

E-mailed to Suzanne Polander 3/26/02

FILE COPY

Sample Receipt

Mississippi DEQ/OPC Laboratory

Sample I.D. AA11433

Location code **C0470114**

Location Description **GULFPORT FERTILIZER SITE**

Sample collector **J.S.**

Collection date: **02/19/2002**

Lab submittal date: **02/21/2020**

Due date: **02/21/2020**

Matrix: **SOIL/SED**

Login record file: **02211019**

Collection time: **11:35**

Lab submittal time: **10:19**

Division Code: **3853**

Basin _____

Permit_No _____

Discharge_No _____

Storet_No _____

Other_No **P1 S17, 0'-2'**

Sample_Location **SOIL BORING P1 S17, 0'-2' DEPTH**

County_Code **047**

Requested_By **PENNY JOHNSTON**

Analyses ordered

pH 9045 in Soil

Lead in Soil

Arsenic in Soil

Total Solids

Method

EPA 9045

ICP 200.7

ICP 200.7

EPA 160.3

Due Date

02/21/2020

03/20/2020

03/20/2020

02/28/2020

Sample I.D. AA11434

Location code **C0470115**

Location Description **GULFPORT FERTILIZER SITE**

Sample collector **J.S.**

Collection date: **02/19/2002**

Lab submittal date: **02/21/2020**

Due date: **02/21/2020**

Matrix: **SOIL/SED**

Login record file: **02211019**

Collection time: **11:45**

Lab submittal time: **10:19**

Division Code: **3853**

Basin _____

Permit_No _____

Discharge_No _____

Storet_No _____

Other_No **P1 S17, 2'-4'**

Sample_Location **SOIL BORING P1 S17, 2'-4' DEPTH**

County_Code **047**

Requested_By **PENNY JOHNSTON**

Analyses ordered

pH 9045 in Soil

Lead in Soil

Arsenic in Soil

Total Solids

Method

EPA 9045

ICP 200.7

ICP 200.7

EPA 160.3

Due Date

02/21/2020

03/20/2020

03/20/2020

02/28/2020

FILE COPY

Sample I.D. AA11435
Location code **C0470116**
Location Description **GULFPORT FERTILIZER SITE**
Sample collector **J.S.**
Collection date: **02/19/2002**
Lab submittal date: **02/21/2020**
Due date: **02/21/2020**
Matrix: **SOIL/SED**

Login record file: **02211019**

Collection time: **12:05**
Lab submittal time: **10:19**

Division Code: **3853**

Basin _____
Permit_No _____
Discharge_No _____
Storet_No _____
Other_No **P1 S15, 0'-2'**
Sample_Location **SOIL BORING P1 S15, 0'-2' DEPTH**
County_Code **047**
Requested_By **PENNY JOHNSTON**

Analyses ordered

pH 9045 in Soil
Lead in Soil
Arsenic in Soil
Total Solids

Method

EPA 9045
ICP 200.7
ICP 200.7
EPA 160.3

Due Date

02/21/2020
03/20/2020
03/20/2020
02/28/2020

Sample I.D. AA11436
Location code **C0470117**
Location Description **GULFPORT FERTILIZER SITE**
Sample collector **J.S.**
Collection date: **02/19/2002**
Lab submittal date: **02/21/2020**
Due date: **02/21/2020**
Matrix: **SOIL/SED**

Login record file: **02211019**

Collection time: **12:15**
Lab submittal time: **10:19**

Division Code: **3853**

Basin _____
Permit_No _____
Discharge_No _____
Storet_No _____
Other_No **P1 S15, 2'-4'**
Sample_Location **SOIL BORING P1 S15, 2'-4' DEPTH**
County_Code **047**
Requested_By **PENNY JOHNSTON**

Analyses ordered

pH 9045 in Soil
Lead in Soil
Arsenic in Soil
Total Solids

Method

EPA 9045
ICP 200.7
ICP 200.7
EPA 160.3

Due Date

02/21/2020
03/20/2020
03/20/2020
02/28/2020

Please refer to the indicated sample I.D. numbers when making inquiries.

FILE COPY



CHAIN OF CUSTODY RECORD

MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY[illegible]

NOTICE: Must use a separate form for each Ice chest.



MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

CHAIN OF CUSTODY RECORD

POLLUTION CONTROL
LABORATORY
121 Fairmont Plaza
Pearl, Mississippi 39208

PROJECT NAME		SHIPPED TO:	
LOCATION		DATA TO:	
Gulfport Fertilizer Site		Penny Johnson	
LOCATION		Gulfport, MS / Harrison County	
SAMPLE TYPES		ANALYSIS	
1. SURFACE WATER		CIRCLE/ADD parameter desired. List no. of containers submitted.	
2. GROUND WATER		METALS (Total) (C/L)	
3. POTABLE WATER		EXT. ORGANICS (C/L)	
4. WASTEWATER		PURE AROMATICS (C/L)	
5. LEACHATE		CYANIDE	
6. SOIL/SEDIMENT		FECAL COLIFORM	
7. SLUDGE		BT & GREASE/PT	
8. WASTE		Phenols	
9. AIR		LOCAL VOLATILES	
10. FISH		REMARKS	
11. OTHER		LAB USE ONLY	
SITE NO.		TOTAL CONTAINERS	
DATE		TIME	
2002		10:35	
2/19		11:45	
2/19		12:05	
2/19		12:15	
STATION LOCATION/DESCRIPTION		P1 S17, 0'-2'	
P1 S17, 2'-4'		P1 S15, 0'-2'	
P1 S15, 2'-4'		P1 S15, 2'-4'	
RELINQUISHED BY:		RECEIVED BY:	
(PRINT) Penny Johnson		(PRINT) Penny Johnson	
DATE/TIME		DATE/TIME	
2/21/02		6:45	
RELINQUISHED BY:		RECEIVED BY:	
(SIGN) Penny Johnson		(SIGN) Penny Johnson	
RELINQUISHED BY:		RECEIVED BY:	
(PRINT)		(PRINT)	
DATE/TIME		DATE/TIME	
RELINQUISHED BY:		RECEIVED BY:	
(SIGN)		(SIGN)	

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NOTICE: Must use a separate form for each ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

Lab Bench No.

1193 F

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Uncontrolled Site Voluntary Remediation Program §17-17-54 Application Form

Facility or Site Data

Site Name	Gulfport Fertilizer Company				
Owner of Site	Hancock Bank of Gulfport, Mississippi				
Address of Site (Street)	33rd Street				
City of Site	Gulfport	State	MS	Zip	
County	Harrison				
Contact Person for Site	Andy Alfonso	Phone	228 601-868-4594 4361	Fax	
Mailing Address	P.O. Box 4019				
City	Gulfport	State	MS	Zip	89502-4019
Soil Contaminant	Lead, Arsenic	Surface Water Contaminant		N/A	
Ground Water Contaminant	Lead, Arsenic	Air Contaminant		N/A	
Latitude (Field Verified)*	30 °	23 ' 42 . 00 "	Longitude (Field Verified)*	89 °	06 ' 48 . 00 "

*Location of Highest Concentration of Contamination in Degrees, Minutes, and Seconds to 2 decimal places (i.e., 33° 53' 21.55")

Party Assuming Responsibility for MDEQ Oversight Costs

Name	Hancock Bank of Gulfport, Mississippi				
Address (Street and P.O. Box)	P.O. Box 4019				
City	Gulfport	State	MS	Zip	89502-4019
Contact Person	Andy Alfonso 204 PHILLIPS	Phone	228 601-868-4594 4445	Fax	
Relationship to Site, (i.e., Owner, Lessee, Potential Buyer, Seller)	Vice-President - Other Real Estate				

Financial Contact (for Payment of MDEQ Invoice)

Firm	Hancock Bank of Gulfport, Mississippi				
Address for Invoice	P. O. Box 4019, Gulfport, Mississippi 39502-4019				
City	Gulfport	State	MS	Zip	39502-4019
Contact Person	Andy Alfonso 204 PHILLIPS	Phone	228 601-868-4594 4445	Fax	228-868-4445

Environmental Consultant

Firm	Butler Services of Mississippi, Inc.				
Address	P.O. Box 1164				
City	Pascagoula	State	MS	Zip	39568-1164
Contact Person	Denton Bates	Phone	228-769-6983	Fax	228-769-1219

Legal Counsel

Firm's Name	Brunini, Grantham, Grower & Hewes, PLLC				
Address	1400 Trustmark Building, 248 East Capitol Street				
City	Jackson	State	MS	Zip	39201
Contact Attorney	Trudy D. Fisher	Phone	601-960-6846	Fax	601-960-6902

Please Print or Type Responses

Form Revision Date 3/12/97

THIS FILE IS CLOSED

**THE MATERIAL ENCLOSED IN THIS
FILE BEGINS ON:**

DATE: May 11, 2000

AND ENDS ON:

DATE: December 31, 2002

**THERE IS MORE RECENT
INFORMATION IN
THE NEXT FILE ON THIS SITE**



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

December 31, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469837

FILE COPY

2 Staff hours @ \$75.00/Hr. for 11/02	\$150.00
---------------------------------------	----------

Total Amount Due	<u>\$150.00</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$150.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy



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

December 31, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469837

FILE COPY

2 Staff hours @ \$75.00/Hr. for 11/02	\$150.00
---------------------------------------	----------

Total Amount Due	<u>\$150.00</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$150.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy



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

MEMORANDUM

FILE COPY

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PJ*
DATE: December 6, 2002
SUBJECT: Site Visit

On December 5, 2002, I traveled to the above referenced site to witness a quarterly groundwater sampling event for the site. Mr. John Szabo of Covington & Associates was on site to conduct the sampling. I collected a split sample from monitoring well one (MW-1) for arsenic and lead. The sample was taken to the OPC lab for analysis.

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Site Visit Memo 12-6-02 (pj).doc



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

December 3, 2002

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: Gulfport Fertilizer Site
Second Groundwater Sampling Event Report dated October 14, 2002
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality has reviewed the above referenced report submitted by Covington and Associates Corporation on behalf of Hancock Bank. The report is approved as submitted. Based on the information provided in the referenced report, MDEQ has two requirements for future sampling events.

1. The conductivity readings during purging shall vary no more than three percent (3%) for three consecutive readings prior to sample collection. While the above referenced report states that conductivity shall vary no more than 10%, the actual readings did not vary more than 3%.
2. Duplicate samples shall be blind duplicates. There shall be no reference to the monitoring well from which the duplicate sample was collected in the duplicate sample name.

If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E. Covington & Associates

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer 2nd GW Sampling Report Approval-Requirement Letter 12-02-02 (pj).doc

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MDEQ

MDEQ

Invoice
37469836

Reference
3746-98

Check Date = 11/19/2002



No.202746100

Inv Date
10/31/2002

Amount Paid
1,127.00

Check Total = 1,127.00

FILE COPY NON NEGOTIABLE
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HANCOCK BANK

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No.202746100

Issued By Integrated Payment Systems Inc., Englewood, Colorado
Payable at Wells Fargo Bank Grand Junction - Downton, N.A., Grand Junction, Colorado
82-401021

**One Thousand One Hundred Twenty Seven & 00/100 Dollars

PAY
TO THE
ORDER
OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE
11/19/2002
*****1,127.00
AMOUNT

George A. Stillege

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000202746100⑈

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MDEQ

MDEQ

Invoice Reference
37469836 3746-98

Check Date = 11/19/2002

No.202746100

Inv Date Amount Paid
10/31/2002 1,127.00

Check Total = 1,127.00



FILE COPY NON NEGOTIABLE
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POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

Issued By Integrated Payment Systems Inc., Englewood, Colorado
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

No.202746100

**One Thousand One Hundred Twenty Seven & 00/100 Dollars

DATE AMOUNT
11/19/2002 *****1,127.00

PAY
TO THE
ORDER
OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289

Authorized Signature
Agent for Integrated Payment Systems Inc.

George A. Phillips

⑈252588⑈ ⑆102100400⑆ ⑆8000202746100⑈



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

October 31, 2002

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469836

12 Staff hours @ \$75.00/Hr. for 09/02	\$900.00
Plus: Analytical Samples #12634- 12636	\$227.00
Total Amount Due	<u>\$1,127.00</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$1,127.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

Invoice

Invoice Number:
Date: June 7, 2002

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 12634 - 12636	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 12634	40.00	40.00
2	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 12635 - 12636	30.00	60.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 12634	23.00	23.00
2	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 12635 - 12636	17.00	34.00
3	TOTAL SOLIDS SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 12634 - 12636	15.00	45.00
SUBTOTAL			227.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$227.00

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MDEQ

MDEQ

No.202743499

Invoice 37469835 Reference 3746-98

Inv Date 10/07/2002 Amount Paid 185.00

Check Date = 10/08/2002

Check Total = 185.00

FILE COPY

NON NEGOTIABLE

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No.202743499

Issued By Integrated Payment Systems Inc., Englewood, Colorado 82-401021
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

**One Hundred Eighty Five & 00/100 Dollars

DATE 10/08/2002 AMOUNT *****185.00

PAY
TO THE
ORDER
OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289

George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000202743499⑈





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

September 30, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469835

FILE COPY

1 Staff hour @ \$75.00/Hr. for 08/02	\$75.00
Plus: Analytical Samples #13612- 13613	\$110.00
Total Amount Due	<u>\$185.00</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$185.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

Invoice

Invoice Number:
Date: September 13, 2002

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (if different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 13612	40.00	40.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Numbers 13613	30.00	30.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 13612	23.00	23.00
1	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 13613	17.00	17.00
SUBTOTAL			110.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$110.00

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594
MDEQ MDEQ

Invoice 37469834 Reference

Check Date = 09/12/2002

No. 40185297

Inv Date 08/30/2002 Amount Pa. 37.50

Check Total = 37.50

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No. 40185297

Issued By Integrated Payment Systems Inc., Englewood, Colorado
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A. Grand Junction, Colorado

**Thirty Seven & 50/100 Dollars

PAY TO THE ORDER OF
MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE 09/12/2002 AMOUNT *****37.50

George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000401852975⑈

FILE COPY





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

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PJ*
DATE: September 13, 2002
SUBJECT: Site Visit

On September 12, 2002, I traveled to the above referenced site to witness a quarterly groundwater sampling event for the site. Mr. John Szabo of Covington & Associates was on site to conduct the sampling. I collected split samples from monitoring wells one and seven (MW-1 and MW-7) for arsenic and lead. The samples were taken to the OPC lab for analysis.

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Site Visit Memo 9-13-02 (pj).doc



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

August 30, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

FILE COPY

Invoice 37469834

.5 Staff hour @ \$75.00/Hr. for 07/02	\$37.50
---------------------------------------	---------

Total Amount Due	<u>\$37.50</u>
-------------------------	-----------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$37.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MS DEPT ENV

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL

No. 401851039

Invoice
37469833

Reference
CUST# 3746-98 GULFPORT FERT.

Inv Date
07/31/2002

Amount Paid
1,500.00

Check Date = 08/13/2002

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No. 401851039



POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

Issued By Integrated Payment Systems Inc., Englewood, Colorado 82-40/102
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

**One Thousand Five Hundred & 00/100 Dollars

DATE AMOUNT
08/13/2002 *****1,500.00

PAY
TO THE
ORDER
OF

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY
OAS ATTN: FEE SECTION
P.O. BOX 20325
JACKSON MS 39289-1325

George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000401851039⑈

FILE COPY





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

July 31, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469833

FILE COPY

20 Staff hours @ \$75.00/Hr. for 06/02	\$1,500.00
Total Amount Due	<u>\$1,500.00</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$1,500.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

MDEQ

MDEQ

No. 40184921

Invoice 37469832 Reference

Inv Date 07/16/2002 Amount Pa. 712..

Check Date = 07/17/2002

Check Total = 712..

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FILE COPY

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POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

No. 40184921

Issued By Integrated Payment Systems Inc., Englewood, Colorado 82-40/10
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colora

**Seven Hundred Twelve & 50/100 Dollars

PAY
TO THE
ORDER
OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE 07/17/2002 AMOUNT *****712.50

George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000401849214⑈





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

June 30, 2002

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469832

9.5 Staff hours @ \$75.00/Hr. for 05/02	\$712.50
Total Amount Due	<u>\$712.50</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$712.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

MDEQ

No. 401847126

Invoice 37469831
Reference 3746-98

Inv Date 06/07/2002
Amount Paid 187.50

Check Date = 06/11/2002

Check Total = 187.50

FILE COPY

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No. 401847126

Issued By Integrated Payment Systems Inc., Englewood, Colorado
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

**One Hundred Eighty Seven & 50/100 Dollars

DATE 06/11/2002
AMOUNT *****187.50

PAY
TO THE
ORDER
OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289

George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000401847126⑈





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

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File

FROM: Penelope Johnston *PJ*

DATE: June 7, 2002

SUBJECT: Site Visit

On June 6, 2002, I traveled to the above referenced site to witness the off-site sampling for the above referenced site. Mr. John Szabo of Covington & Associates was on site to oversee the fieldwork and collect the samples. Great Lakes Geotechnical Services was on site to conduct the drilling activities. I collected split samples from soil borings OS-18 2'-4' below ground surface, SS-3 0'-1' below ground surface, and SS-3 1'-2' below ground surface for lead, arsenic, and total solids. The samples were taken to the OPC lab for analysis.

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Site Visit Memo 6-7-02 (pj).doc



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

June 5, 2002

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: Gulfport Fertilizer Site
Proposed Additional Soil Boring Locations (Off-Site) and Proposed Monitoring Well Locations (On-Site) dated May 21, 2002, and Clarification - Proposed Additional Soil Boring Locations (Off-Site) and Proposed Monitoring Well Locations (On-Site) dated May 31, 2002
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality has reviewed the above referenced proposals submitted by Covington and Associates Corporation on behalf of Hancock Bank. The proposed work is approved. The fieldwork is scheduled to begin June 6, 2002. If you have any questions or comments, or if the date to begin fieldwork changes, please contact Penny Johnston at (601) 961-5388.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Russell".

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John Szabo, P.E. Covington & Associates

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Offsite Sampling and MW Installation Approval Letter 6-4-02 (pj).doc

Covington & Associates Corporation

Environmental Engineers and Consultants

May 31, 2002

FILE COPY



Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

**Re: Clarification - Proposed Additional Soil Boring Locations (Off-Site) and
Proposed Monitoring Well Locations (On-Site)
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi**

Dear Penny:

Covington and Associates Corporation (CAC), in its letter of May 21, 2002, proposed to advance additional off-site borings to collect sub-surface soil samples. On May 30, 2002, you and I discussed that letter. This letter is presented to document that discussion and to clarify the additional off-site sampling proposed.

On the figures provided with the May 21st letter, I mislabeled the proposed off-site boring west of proposed off-site boring "OS-16". The boring should be labeled as "OS-17" and not "OS-2". The proposed off-site borings will be "OS-16" through "OS-23" (a total of eight borings). The attached figures have been revised to show the correct boring designations.

We have reviewed Table 1. The arsenic and lead concentrations shown on Table 1 for OS-1 through OS-15 were arsenic and lead concentrations on a "wet weight basis". The attached Table 1 has been revised to show arsenic and lead concentrations on a "dry weight basis". The attached figures have also been revised to show the concentrations on a "dry weight basis".

As we discussed, we will also take sediment samples along the creek at four (4) selected locations. Samples will be taken from downstream to upstream. At each location a 2' boring will be advanced. The collected sample will then be split to 0'-1' and 1'-2'. Each sample will then be analyzed for the same parameters as the samples collected from the off-site borings. If additional soil is required in order to perform the analysis, one or more additional 2' boring will be advanced at the same stream location and the soil from 0'-1' and 1'-2' will be composited to provide sufficient soil for the proposed analyses.



COVINGTON AND ASSOCIATES CORPORATION
Clarifications - Proposed Additional Soil Boring Locations (Off-Site) and
Proposed Monitoring Well Locations (On-Site)
Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi

May 31, 2002 /Page 2

We have also check project files to determine which of the two (2) locations for "31S14" shown on the attached figures is correct. The correct location for "31S14" is at the intersection of the site sampling grid lines and not the location southeast of the intersection point. The drawings are being revised to eliminate the second "31S14" location southeast of the sampling grid intersection.

I have also reviewed the project files to determine if borings were advanced at locations designated "P1 through P24". You had remembered these borings as being proposed by Butler Services of Mississippi (Butler Services) to be advanced around the major area of soil contamination on the site. I have not found any evidence that these borings were either proposed or installed. Butler Services did, however, propose to advance twelve (12) borings – PCN1 through PCN6 north of the main area of contamination and PCS1 through PCS6 south of the main area of contamination. These were proposed in Butler Services' "Work Plan, Off-Site/Source Area Soils and Groundwater Sampling" (Work Plan) dated August 21, 2000 and revised December 18, 2000. Butler Services proposed to advance a conductivity probe at each of these locations to determine sub-surface soil characteristics to supplement geological data collected from adjacent soil borings and to determine groundwater characteristics. Butler Services felt that information from the conductivity probes at each boring location (PCN1 through PCN6 and PCS1 through PCS6) would help in locating monitoring wells on the site.

When CAC was hired by Hancock Bank to complete the site investigation and characterization, we did not feel that advancing conductivity probes would provide additional significant information which would not be gained from either collecting groundwater samples at selected locations or from geologic logs of soil borings advanced on the site. Therefore, CAC requested that the Work Plan be revised to eliminate the borings, except for PCN1 where a conventional soil boring would be advanced and logged and a groundwater sample collected. This was approved by MDEQ and the boring was advanced in late February 2002.

We are not aware of any other borings, but if you can provide information on other borings either proposed or advanced by Butler Services that are not shown on the attached drawings, please provide us with such documentation so we can find that information and include it on both the drawings and in the site characterization report.

With these clarifications, CAC, on behalf of its client – Hancock Bank, requests permission from the Mississippi Department of Environmental Quality (MDEQ) to advance the proposed off-site borings at the locations shown on the attached drawings. We are planning to advance the off-

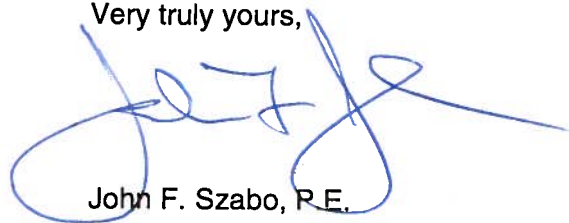
COVINGTON AND ASSOCIATES CORPORATION
Clarifications - Proposed Additional Soil Boring Locations (Off-Site) and
Proposed Monitoring Well Locations (On-Site)
Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi

May 31, 2002 /Page 3

site borings next Thursday, June 6, 2002. The monitoring wells will probably be installed the following week with the initial sampling of the monitoring wells being done during the week of June 17th.

If you have any questions concerning this information, please contact us. If this proposal meets with your approval, please send us your approval of this approach. We appreciate your input and help on this project and look forward to hearing from you and seeing you on June 6th.

Very truly yours,



John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank/Enclosures

Table 1
Summary of Analysis
Soil Samples
Former Gulfport Fertilizer Site
Gulfport, MS
Client: Hancock Bank

Sample Location	Arsenic (mg/kg)										Lead (mg/kg)									
	0'-2'	2'-4'	4'-8'	8'-12'	12'-16'	16'-20'	> 20'	0'-2'	2'-4'	4'-8'	8'-12'	12'-16'	16'-20'	> 20'	0'-2'	2'-4'	4'-8'	8'-12'	12'-16'	> 20'
PN23	0.85	N.A.	1.1												39		N.A.			
PN30.1	2.8	2.4													41					
31N28.1	1.7	1.8													6.2					
PN20	170,220	700	230,710												400,270					
31N18.1	69	62	28												300					
PN21	35	1.0													140					
N18.1	2,221.9	0.86													27,720					
PN19	1.3	<0.02													17					
RC10.1	140	23	50												180					
RC9.1	29	7,824	6.9												420					
PT8C18	32	29	33												160					
RC7.1	43	6.0													1,400					
PT514	24	2.4													220					
1450.1N	39	<0.59	1.2												600					
PT515	12	15	30												3,700					
PT516	0.1	2.3	1.4												7,200					
Y580.1N	2,120	160	190												1,600					
PT511	16.1	2.5													160					
PT511	17,130	<0.60													11,007,160					
PT512	47	5.0	41												3,100					
PT513	27	7.7	3.3												1,500					
PT513	30	100	23												35					
PT515.1	22	N.A.	67												150					
PT517	35	35	0.51												150					
PT59	110	1.5	3.7												100					
Y480.1E	31	1.2													200,000					
Y4100.1E	10,190	83	12												1,700					
PT59	200	80	3.1												7,007,760					
PT510	27	130	67												1800					
S40.1	1.4	4.1													27					
PT56	130	95	80												3,400					
PT57	17	3.7													570					
S50.1	590	94	48												2,000					
PT53	3.7	2.5													49					
PT54	2.2	1,771.2													1209					
S45.1	4.4	5.0													6.5					
PT55	4832	1.2													4,005,310					
PT51	1.5	0,000.89													39					
PT52	4.7	1.6													56					
31S51.1	6.7	4.2													6.8					
PS70.1	1.0	<0.58													45					
OS-1	200	23,359	2.9												5.5					
OS-2	3.5	2.0													4.5					
OS-3	0.86	4.7													7.0					
OS-4	2.5	4.7													29					
OS-5	15	1.2													900					
OS-6	57,065	17	4.3												43,002,500					
OS-7	65	2.9													300					
OS-8	12,718	1.5													260,230					
OS-9	140	14	3.3												400					
OS-10	49	1,072.6													260					
OS-11	1.5	1,671.3													41					
OS-12	<0.502.8	1.5													3,755.4					
OS-13	1.5	1,222.5													16					
OS-15	1.0	1.0													20					

Note: Shaded results exceed background level of 7.18 mg/kg for arsenic, 400 mg/kg for lead and 5.0 mg/l for TCLP arsenic and TCLP lead.
N.A. - Not Analyzed

Covington & Associates Corporation

Environmental Engineers and Consultants

May 21, 2002

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385



**Re: Proposed Additional Soil Boring Locations (Off-Site) and
Proposed Monitoring Well Locations (On-Site)
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi**

FILE COPY

Dear Penny:

Covington and Associates Corporation (CAC), based on analytical results from soil samples collected off-site in April 2002, is proposing to advance additional off-site borings to collect sub-surface soil samples. Additionally, based on groundwater samples (filtered and unfiltered) collected in February and April 2002 and previously on the site, CAC is proposing installing six (6) monitoring wells on the site at selected locations. This letter will present the information on which these recommendations are based.

Fourteen (14) borings were advanced off-site on April 23 and 24, 2002. Soil samples were collected and analyzed for arsenic and lead. A summary of the analytical results for the soil samples analyzed are contained in Table 1, attached. The boring locations and analytical results were also shown on the attached drawings – "Arsenic Soil Results (0'-2')", Arsenic Soil Results (2'-4')", Lead Soil Results (0'-2') and Lead Soil Results (2'-4'). As shown, there are seven (7) off-site boring locations where arsenic or lead exceeded either background (arsenic – 7.18 mg/kg) or regulatory (lead - 400 mg/kg) limits. These locations are OS-1, OS-5, OS-6, OS-7, OS-8, OS-9, and OS-10.

In order to insure that the areas of arsenic or lead contaminated soil has been adequately



COVINGTON AND ASSOCIATES CORPORATION
Proposed Additional Soil Boring Locations (Off-Site) and
Proposed Monitoring Well Locations (On-Site)
Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi

May 21, 2002 /Page 2

delineated both vertically and horizontally, CAC is proposing to advance eight (8) additional borings off-site (OS-16 to OS-22) to 8' below ground surface and to collect soil samples from 0'-2', 2'-4', 4'-6' and 6'-8'. The soil samples collected from 0'-2' and 2'-4' from each boring will be analyzed for pH, arsenic and lead. The soil samples from 4'-6' and 6'-8' will be held pending the results from the analysis of the samples from 2'-4'. If a boring is west of the stream located on the adjacent property, CAC will not advance that boring, but collect a sediment sample from the stream and analyze it for arsenic and lead.

We are also attaching two maps showing the arsenic and lead analytical results for groundwater sampling at the site – "Arsenic Groundwater Results" and "Lead Groundwater Results". The groundwater samples collected by CAC were both filtered and unfiltered. The analytical results for both the filtered and unfiltered samples are shown on Table 2, attached, and on the drawings. In estimating the approximate limit of groundwater exceeding the regulatory limits (0.010 mg/l for arsenic and 0.005 mg/l for lead), CAC used the filtered groundwater results since we feel that these are more representative of the results, which will be seen when monitoring wells are installed.

In order to determine the best location for the proposed six (6) monitoring wells, CAC prepared a drawing showing the approximate limits of groundwater exceeding regulatory limits (arsenic and lead) and the existing monitoring well presently on the site (MW-1). The proposed six (6) monitoring wells are all located on-site with five (5) of the proposed monitoring well locations being located outside the approximate limits of groundwater exceeding regulatory limits and one (1) being in an area suspected of potentially having the highest concentrations of lead and arsenic in the groundwater. We are proposing to install each well in accordance with the previously approved Work Plan. Each well will be installed to a depth of 15' since the deepest soil contamination was found 8'-12' below ground (see Table 1).

CAC, on behalf of its client – Hancock Bank, requests permission from the Mississippi Department of Environmental Quality (MDEQ) to advance the proposed off-site borings at the locations shown on attached drawings and to install the monitoring wells at the locations shown on the attached drawing entitled "Proposed Monitoring Well Locations. CAC and Hancock Bank understand that, if the analytical results from the soil samples collected from the off-site

COVINGTON AND ASSOCIATES CORPORATION
Proposed Additional Soil Boring Locations (Off-Site) and
Proposed Monitoring Well Locations (On-Site)
Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi

May 21, 2002 /Page 3

borings do not show that the horizontal and vertical extent of any off-site contamination has been defined, then additional off-site borings will be required and that if the proposed monitoring well locations do not adequately define the area of suspected groundwater contamination, then additional monitoring wells may be required. If that becomes necessary, CAC will submit proposed locations for the additional borings or monitoring wells.

If you have any questions concerning this request, please contact us. If this proposed meets with your approval, please send us your approval of this approach. We appreciate your input and help on this project and look forward to hearing from you.

Very truly yours,



John F. Szabo, P.E.

Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank/Enclosures

Table 1
Summary of Analytical
Soil Samples
Former Gulfport Fertilizer Site
Gulfport, MS
Client: Hancock Bank

Sample Location	Arsenic (mg/kg)					Lead (mg/kg)				
	0'-2'	TCLP, 0'-2'	2'-4'	4'-6'	Soil Sample Interval (ft)	0'-2'	TCLP, 0'-2'	2'-4'	4'-6'	Soil Sample Interval (ft)
P1N20	0.65		N.A.	1.1		39		N.A.		
P1N20.1	2.8		2.4			41		1.9		
31N28.1	1.7		1.8			6.2		3.2		
P1N20	300760		180	200760	4.8	400270		28		
31N18.1	18		0.5	36	6.1	300		9.3		
P1N21	48		1.0			739		3.9		
R18.1	3.272.9		0.86			2720		28		
P1N18	1.3		<0.02			17		4.5		
P1N19	8.3		16	4.1	3.8	37		19		
R10.1	141		31	3.0	2.3	388		9.1		
R8.1	28		162.4	3.9	3.2	732		20715		
P1R18	12		31	1.8	1.8	1400		38		
R7.1	43		5.0					160		
P181.4	43		31	2.4		220		230		
Y450.1N	33		<0.58	1.2		800		4.1		
P1818	12		35	30	0.89	1700		39		
P1818	81		2.3	N.A.	2.2	730		38		
T650.1N	120		160	140	1.8	1100		360		
T6.1	35		2.5			100		12		
P1811	115.3		<0.80			1100740		21		
S18.1	300		<0.050	3.1	6.8	3100		8.07.3		
P1812	17		<0.050	5.0		1500		100		
P1819	27		2.7	3.9	<0.84	35		8.9		
S18.1	15		100	32	0.87	160		N.A.		
31815.1	31		N.A.	3.7	6.7	100		12		
P1817	15		25	0.81		31000		21		
P188	110		1.5	3.7	3.2	1200		29		
T450.1E	31		1.2			140760		31		
Y100.1E	31		33	30	3.2	1800		48		
P188	240		16	9.1	7.0	500		60		
P1810	27		30	37	0.63	27		5.4		
840.1	1.4		4.1			110		110		
P188	118		16	80	4.4	1470		13		
P187	17		3.7			48		3.2		
S50.1	300		26	48	2.2	32084		3.3		
P183	3.7		2.5			100210		19		
P184	3.2		1.77.2			38		2.72.9		
S65.1	4.4		5.0			58		4.8		
P185	457.2		1.2			6.8		7.7		
P181	1.5		0.800.89			45		2.9		
P182	4.7		1.8			38		0.701.9		
31851.1	6.7		4.2			38		0.88		
P870.1	1.0		<0.58			21		3.1		
OS-1	20		2000	2.4	5.9	370		8.2		
OS-2	2.9		1.7			1400760		140		
OS-3	0.79		4.0			170		1.4		
OS-4	1.8		4.0			180770		5.8		
OS-5	315.3		1.0			310		28		
OS-6	47		2.8	7.1	1.2	150		3.25.8		
OS-7	47		1.2			37		6.5.8		
OS-8	3.27.2		1.8			315.4		1.2		
OS-9	116		0.872.6	2.5		14		3.80.7		
OS-10	81		1.471.3			18		3.1		
OS-11	1.4					3.1		3.80.7		
OS-12	<0.802.8		1.4			14		3.1		
OS-13	1.02.1		1.4			18		3.1		
OS-15	0.86		0.88							

Note: Shaded results exceed background level of 7.18 mg/kg for arsenic, 400 mg/kg for lead and 5.0 mg/kg for TCLP arsenic and TCLP lead.



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

May 31, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

FILE COPY

Invoice 37469831

2.5 Staff hours @ \$75.00/Hr. for 04/02	\$187.50
Total Amount Due	<u>\$187.50</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$187.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MDEQ

MDEQ

No.202742170

Invoice 37469830
Reference 3746-98

Inv Date 05/07/2002
Amount Paid 37.50

Check Date = 05/09/2002

Check Total = 37.50

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 **HANCOCK BANK.**

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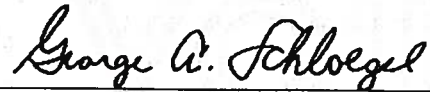
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Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

**Thirty Seven & 50/100 Dollars

DATE 05/09/2002
AMOUNT *****37.50

PAY
TO THE
ORDER
OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289



Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000202742170⑈



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

April 30, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469830

FILE COPY

.5 Staff hour @ \$75.00/Hr. for 03/02	\$37.50
---------------------------------------	---------

Total Amount Due	<u>\$37.50</u>
-------------------------	-----------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$37.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

MDEQ

MDEQ

No.20274030

Invoice 3-31-02
Reference 3746-98

Inv Date 04/05/2002
Amount Pa 1,191.

Check Date = 04/09/2002

Check Total = 1,191.

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Issued By Integrated Payment Systems Inc. Englewood, Colorado
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colo

**One Thousand One Hundred Ninety One & 50/100 Dollars

PAY
TO THE
ORDER
OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE 04/09/2002
AMOUNT *****1,191.50

George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000202740307⑈





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

April 4, 2002

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport, Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: Gulfport Fertilizer Site
Proposed Soil Boring Locations - Off-Site Area Soils and Groundwater
Sampling dated March 22, 2002
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document submitted by Covington and Associates Corporation on behalf of Hancock Bank. The requested modifications to the sampling plan are approved. If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Russell".

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John Szabo, P.E. Covington & Associates

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Approval Letter for Off-Site Soil & GW Sampling Plan Modifications 4-4-02 (pj).doc



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

March 31, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469829

11.5 Staff hours @ \$75.00/Hr. for 02/02	\$862.50
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Plus: Analytical Samples #11433 - 11436	\$329.00
---	----------

Total Amount Due	<u>\$1,191.50</u>
-------------------------	--------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$1,191.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

FILE COPY

Invoice

Invoice Number:
Date: February 22, 2002

OFFICE OF POLLUTION CONTROL
LABORATORY
121 FAIRMONT PLAZA
PEARL, MS 39208
PHONE: (601) 939-8460

To:
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
P. O. BOX 10385
JACKSON, MS 39289

Ship to (If different address):
DEPARTMENT OF ENVIRONMENTAL QUALITY
UNCONTROLLED SITES SECTION VOLUNTARY
EVALUATION PROGRAM
2380 HWY 80 WEST
JACKSON, MS 39204

QTY.	DESCRIPTION	UNIT PRICE	TOTAL
1	METALS SAMPLE PREPARATION, Gulfport Fertilizer Sample Numbers 11433 - 11436	25.00	25.00
1	ARSENIC SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 11433	40.00	40.00
3	ARSENIC SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 11434 - 11436	30.00	90.00
1	LEAD SAMPLE ANALYZED, Gulfport Fertilizer Sample Number 11433	23.00	23.00
3	LEAD SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 11434 - 11436	17.00	51.00
4	pH SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 11433 - 11436	10.00	40.00
4	TOTAL SOLIDS SAMPLES ANALYZED, Gulfport Fertilizer Sample Numbers 11433 - 11436	15.00	60.00
SUBTOTAL			329.00
SALES TAX RATE %			
SALES TAX			0.00
SHIPPING & HANDLING			
TOTAL DUE			\$329.00

Covington & Associates Corporation

March 22, 2002

FILE COPY

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385



**Re: Proposed Soil Boring Locations
Off-Site Area Soils and Groundwater Sampling
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi**

Dear Penny:

Covington and Associates Corporation (CAC), based on analytical results from soil and groundwater samples collected in February 2002, is proposing to limit the initial off-site sampling proposed in the *Site Characterization Work Plan* (Work Plan) prepared by Butler Services of Mississippi and revised by CAC. As shown on Figure 1, attached, CAC proposes to advance sixteen (16) soil borings (OS-1 through OS-16). Eight (8) of these borings (OS-1, OS-3, OS-5, OS-7, OS-9, OS-11, OS-13 and OS-15) will be located approximately 50' west of the property line and eight (8) borings (OS-2, OS-4, OS-6, OS-8, OS-10, OS-12, OS-14 and OS-16) will be located approximately 100' west of the property line. Twelve (12) borings (OS-1, OS-2, OS-3, OS-5, OS-6, OS-7, OS-9, OS-10, OS-11, OS-13, OS-14 and OS-15), shown in green on Figure 1, will be advanced to 16' below ground surface (BGS) and four (4) borings (OS-4, OS-8, OS-12, and OS-16), shown in red on Figure 1, will be advanced to the confining clay layer which is approximately 22' – 28' BGS. The sample collection procedures presented in the Work Plan will be followed. Groundwater samples will be collected from four (4) boring locations (OS-2, OS-6, OS-10 and OS-16), as shown in blue on Figure 2. Due to the heavy undergrowth and density of trees off-site, the proposed borings locations will be surveyed in after the borings are advanced.

The on-site soil borings advanced to the confining clay layer during the investigation in February 2002 are shown in red on Figure 1. The on-site soil boring locations where groundwater samples were collected in February 2002 are shown in blue on Figure 2. We are also providing you Table 1 (Summary of Analysis – Soil Samples) and Table 2 (Summary of Analysis – Groundwater Samples) showing the results for the on-site samples collected in



COVINGTON AND ASSOCIATES CORPORATION
Proposed Off-Site Soil Boring Locations
Former Gulfport Fertilizer Site, Gulfport, MS

March 22, 2002 /Page 2

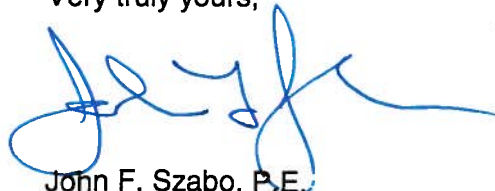
February 2002.

As shown on Table 1, the deepest contamination along the west property line occurs at RC10.1 (0' - 8' BGS for arsenic), P1S6 (0'-6' BGS for arsenic) and S50.1 (0'-6' BGS for arsenic). Based on this information, we believe that the maximum depth of contamination, if any, encountered off-site will be at a depth of 8' BGS or less. Therefore, by advancing all borings to at least 16' BGS, we should collect sufficient soil samples to determine the vertical extent of off-site contamination, if any.

CAC, on behalf of its client – Hancock Bank, requests permission from the Mississippi Department of Environmental Quality (MDEQ) to advance the initial off-site borings shown on Figure 1 and to collect groundwater samples from locations shown on Figure 2. CAC and Hancock Bank understand that, if the analytical results from the soil samples collected from the initial off-site borings do not show that the horizontal and vertical extent of any off-site contamination has been defined, then additional off-site borings will be required. If that becomes necessary, CAC will submit proposed locations for the additional borings necessary to define the horizontal and vertical limits of the contamination.

If you have any questions concerning the proposed initial boring locations, please contact us. If the proposed initial boring locations meet with your approval, please send us your approval of this approach. We appreciate your input and help on this project and look forward to hearing from you.

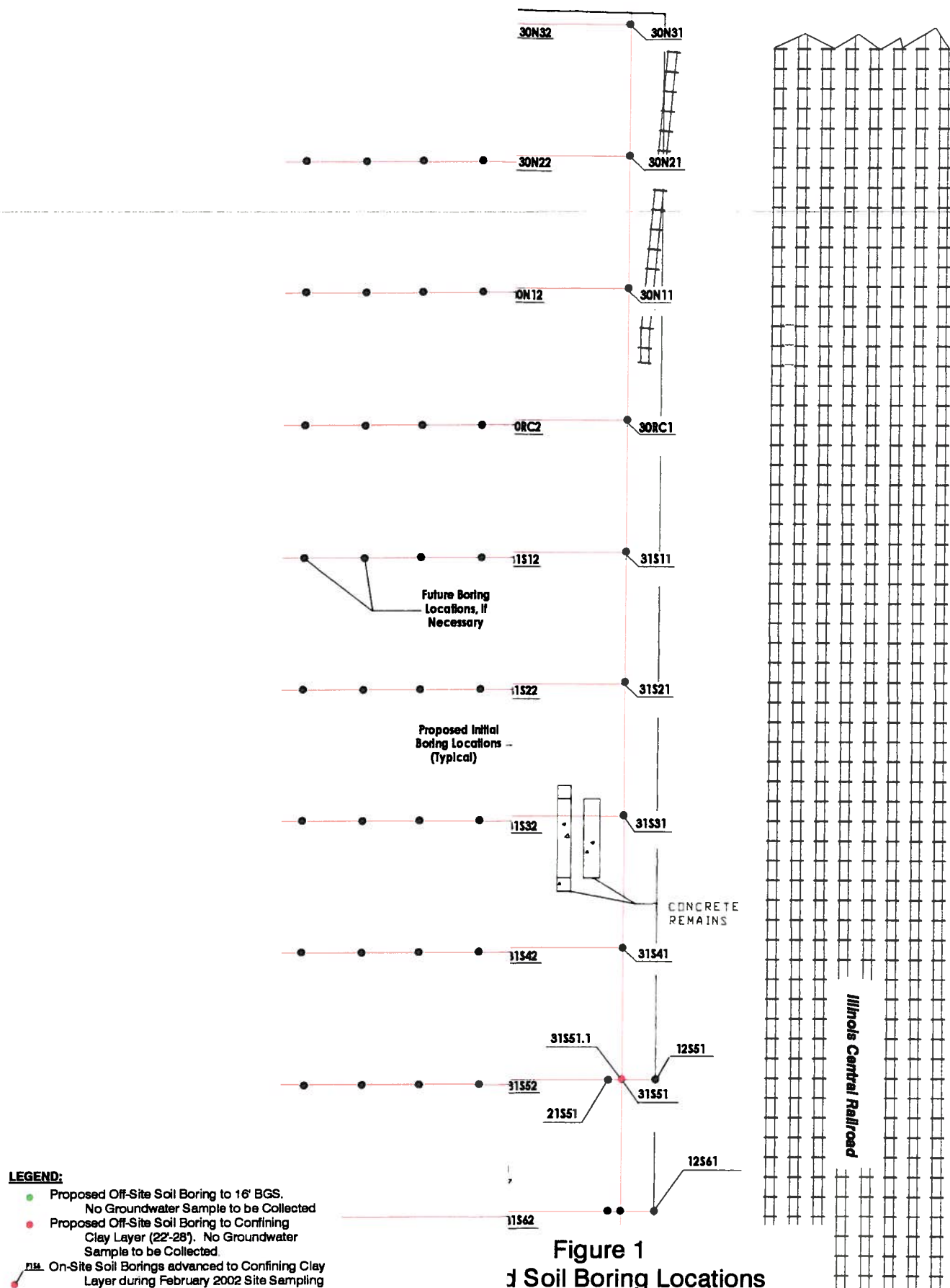
Very truly yours,



John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank/Enclosures



LEGEND:

- Proposed Off-Site Soil Boring Where Groundwater Sample to be Collected
- Proposed Off-Site Soil Boring to 16' BGS. No Groundwater Sample to be Collected
- Proposed Off-Site Soil Boring to Confining Clay Layer (22'-28'). No Groundwater Sample to be Collected.
- Soil Borings advanced During February 2002 Site Sampling where Groundwater Sample Collected

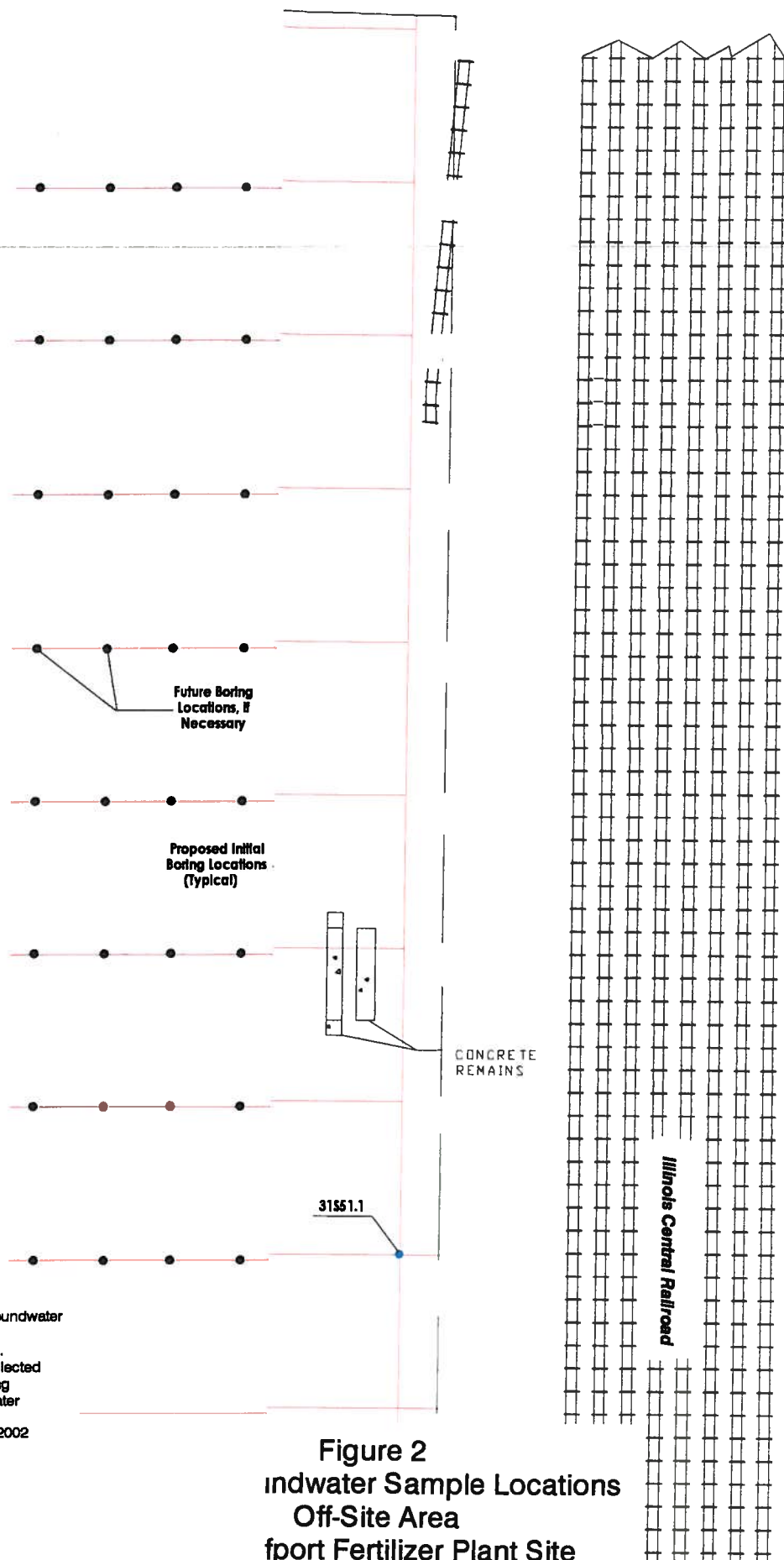


Figure 2
Indwader Sample Locations
Off-Site Area
port Fertilizer Plant Site

Table 1
Summary of Analysis
Soil Samples
Former Gulfport Fertilizer Site
Gulfport, MS
Client: Hancock Bank

Sample Location	Arsenic (mg/kg)					Lead (mg/kg)				
	0'-2'	2'-4'	4'-6'	6'-8'	12'-16'	0'-2'	2'-4'	4'-6'	6'-8'	12'-16'
PTN23	0.85	N.A.	1.1			39	N.A.	H		
PN30.1	2.8	2.4				41	1.9			
31N29.1	1.7	1.6				6.2	3.2			
PTN20	170/230	700	230/190	4.6		400/270	28			
31N19.1	68	62	28	6.1	6.4	300	9.3			
PTN21	65	1.0				720	3.9			
N18.1	3.2/2.9	0.86				27/20	26			
PTN18	1.3	<0.62				17	4.5			
PTN19	9.5	86	48	9.6	16	37	19			
RC10.1	140	21	50	23	5.4	680	9.1			
RC9.1	29	75/34	93	3.2		30/15				3.8 (20'-24')
PTN18	32	29	33	1.8	1.8	780	160			
RC7.1	43	5.0				1400	36			
PTN14	43	24	2.4			220	230			
T450.1N	39	<0.58	1.2			800	4.1			
PTN15	12	15	30	0.99		1700	39			
PTN16	45	2.3	N.A.	2.2	1.4	7200	580	71		
T550.1N	120	160	190	55	15	5500	360			
T5.1	25	2.5				160	12			
PTN11	11/1.0	<0.60				1100/180	21			11 (24'-26')
S18.1	300	38/58	41	6.8	4.3	3100	8.0/7.3			
PTN12	47	5.0				6800	16			
PTN13	27	7.7	9.6	<0.64		1300	100			
S16.1	50	100	63	8.3	H	35	8.9			
31S15.1	22	N.A.	57	6.7		160	N.A.	31		
PTN17	35	20	0.81			100	12			
PTN8	110	1.5	3.7	3.3	7.7	28000	450	H		
T450.1E	31	1.2	1.2			1700	23			
T4100.1E	110/130	4.3	20	3.2	H	790/760	31			
PTN9	200	80	9.1	43	H	1800	46			
PTN10	27	130	67	0.63		580	60			
S40.1	1.4	4.1				27	5.4			
PTN6	110	66	80	4.4	1.4	3800	110			
PTN7	17	3.7				570	18			
S50.1	990	94	48	2.2	H	2000	13			
PTN3	3.7	2.5			<0.62	49	3.2			
PTN4	3.2	1.7/1.2				1200	330/94			
S45.1	4.4	5.0				6.5	3.3			
PTN5	45/22	1.2				400/210	16			
PTN1	1.5	0.80/0.89				39	2.7/2.9			
PTN2	4.7	1.6				56	4.6			
31S51.1	6.7	4.2				6.8	7.7			
PS70.1	1.0	<0.58				45	2.9			

Note: Analyses shown are through 3/21/02.

Table 2
Summary of Analysis
Groundwater Samples
Former Gulfport Fertilizer Site
Gulfport, MS

Client: Hancock Bank

Sample Location	pH (Std. Units)	Arsenic (mg/l)		MDEQ's Arsenic Tier 1 TRG (mg/l)	Lead (mg/l)		MDEQ's Lead Tier 1 TRG (mg/l)
		Total	Dissolved		Total	Dissolved	
PCN1	4.8	0.018	<0.010	0.010	0.11	<0.0050	0.0050
N18.1	4.3	0.91	0.13	0.010	0.75	0.0054	0.0050
RC10.1	3.5	1.4	0.071	0.010	4.9	0.45	0.0050
P1S17	5.8	1.7	<0.010	0.010	0.5	<0.0050	0.0050
P1S8	5.5	0.71	<0.010	0.010	26	0.69	0.0050
S40.1	5.2	0.088	0.012	0.010	0.087	<0.0050	0.0050
P1S5	6.9	0.14	<0.010	0.010	0.66	<0.0050	0.0050
31S51.1	6.6	0.061	<0.010	0.010	0.073	<0.0050	0.0050

- Shaded results exceed MDEQ's Tier 1 TRG for the groundwater constituent analyzed.

Note: Analyses shown are through 3/21/02

MDEQ

MDEQ

No.202738602

Invoice Reference
37469828

Inv Date Amount Paid
03/12/2002 525.0

Check Date = 03/12/2002

Check Total = 525.0

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No.202738602

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Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

**Five Hundred Twenty Five & 00/100 Dollars

DATE AMOUNT
03/12/2002 *****525.00

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TO THE
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OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289

George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000202738602⑈





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

February 28, 2002

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469828

FILE COPY

7 Staff hours @ \$75.00/Hr. for 01/02	\$525.00
---------------------------------------	----------

Total Amount Due	<u>\$525.00</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$525.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy



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

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site

FROM: Penelope Johnston *PJ*

DATE: February 22, 2002

SUBJECT: Site Visit

On February 19, 2002, I traveled to the above referenced site to witness the on-site soil sampling being conducted as part of the Subsurface Investigation Work Plan. Mr. John Szabo and Ms. Alane Young of Covington & Associates were on site to collect the samples. Great Lakes Geotechnical of New Orleans, Louisiana conducted geoprobe drilling. I collected split samples from the following locations for arsenic, lead, pH, and total solids: P1S17 0'-2', P1S17 2'-4', P1S15 0'-2', and P1S15 2'-4'. The samples were taken to the OPC laboratory for analysis.

C:\My Documents\My Files\Gulfport Fertilizer\~ \$Ifport Fertilizer Site Visit Memo 2-22-02 (pj).doc



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

February 14, 2002

FILE COPY

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Site
Health and Safety Plan for Subsurface Investigation dated November
12, 2001
*Requested Modifications to the Health and Safety Plan for Subsurface
Investigation* dated February 8, 2002
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced health and safety plan (HASP) submitted by Butler Services of Mississippi, Incorporated and the referenced requested modifications to the HASP submitted by Covington and Associates Corporation on behalf of Hancock Bank. The HASP and its requested modifications are approved. If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

A handwritten signature in dark ink, appearing to read "DA Russell".

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E. Covington and Associates

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer HASP Approval Letter 2-13-02 (pj).doc

Covington & Associates Corporation

Environmental Engineers and Consultants

February 8, 2002

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385



**Re: Requested Modifications
Health and Safety Plan
Subsurface Investigation
Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi**

FILE COPY

Dear Penny:

On behalf of Hancock Bank, Covington and Associates Corporation (CAC) has reviewed the subject Health and Safety Plan prepared by Butler Services of Mississippi, Inc. dated December 2000 and revised November 12, 2001. The site investigation is scheduled to begin the week of February 18, 2002. Prior to performing the site investigation, CAC is requesting that certain aspects of the Health and Safety Plan be modified. This letter presents the requested modifications and references the portions of the Work Plan where the requested modifications apply.

Refer to Health and Safety Plan - All references to Butler Services of Mississippi, Inc. or Butler Services are to be changed to Covington & Associates Corporation.

Refer to Health and Safety Plan - All references to Butler Services Safety Officer are to be changed to Covington and Associates Safety Officer.

Refer to Page 1, Authority for Safety - Butler Site Safety Officer (SSO) shall be changed to Covington and Associates Site Safety Officer (SSO). Mr. Denton Bates will be changed to Mr. John Szabo as the designated SSO for the project.

Refer to Page 5, Plan Approval - The document was prepared by W.D. Bates, Site Safety Officer on November 12, 2001. The Health and Safety Plan is approved and accepted by John Szabo, Site Safety Officer, with changes presented in this letter, on February 8, 2002.



COVINGTON AND ASSOCIATES CORPORATION
Requested Modifications to Health and Safety Plan
Former Gulfport Fertilizer Site, Gulfport, MS

February 8, 2002 /Page 2

Refer to Appendix B, Equipment Decontamination Procedures — Replace the Equipment Decontamination Procedures listed in Appendix B with the following modification. The following modification is an approved modification to the Work Plan.

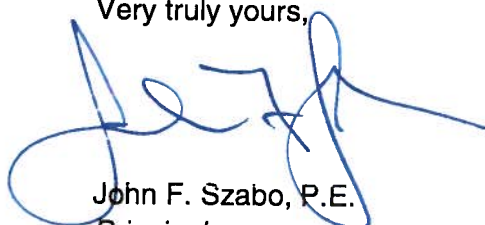
Since a disposable acetate liner will be used for collecting soil samples, only the geoprobe's outer core barrel will need to be cleaned during sampling operations. The following cleaning procedure for drill rigs as presented in Appendix B, Section B.3.4 of the US EPA's Region IV's *Environmental Investigations Standard Operating Procedures and Quality Assurance Manual* will be followed after each soil interval is cored and the disposable acetate liner removed from the core barrel:

- The core barrel will be washed in tap water containing liquinox. The core barrel will be thoroughly brushed to remove particulate matter and surface films.
- The core barrel will then be rinsed with clean tap water and allowed to air dry.

The cleaning solution and rinsate will be transferred to drums for characterization and disposal off-site in a permitted facility.

We hope that these requested modifications to the subject Health and Safety Plan meets with MDEQ's approval. If you have questions concerning any of these requested modifications, please contact us.

Very truly yours,



John F. Szabo, P.E.
Principal

cc: Joy Phillips, Hancock Bank

Covington & Associates Corporation
P.O. Box 177
Pass Christian, MS 39571
(228) 452-4999
(228) 452-0117 (fax)

FILE COPY

FACSIMILE COVER PAGE

To: Penny Johnston**From:** John F. Szabo**Fax #:** 1-601-961-5300**Company:** MDEQ**Subject:** Requested Modifications to Health & Safety Plan**Sent:** 2/8/02 at 1:45:36 PM**Pages:** 1 (including cover)**MESSAGE:**

Will be mailing original to you today. Call if you have questions. Thanks.

John

Covington & Associates Corporation

February 8, 2002

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

**Re: Requested Modifications
Health and Safety Plan
Subsurface Investigation
Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi**

Dear Penny:

On behalf of Hancock Bank, Covington and Associates Corporation (CAC) has reviewed the subject Health and Safety Plan prepared by Butler Services of Mississippi, Inc. dated December 2000 and revised November 12, 2001. The site investigation is scheduled to begin the week of February 18, 2002. Prior to performing the site investigation, CAC is requesting that certain aspects of the Health and Safety Plan be modified. This letter presents the requested modifications and references the portions of the Work Plan where the requested modifications apply.

Refer to Health and Safety Plan - All references to Butler Services of Mississippi, Inc. or Butler Services are to be changed to Covington & Associates Corporation.

Refer to Health and Safety Plan - All references to Butler Services Safety Officer are to be changed to Covington and Associates Safety Officer.

Refer to Page 1, Authority for Safety - Butler Site Safety Officer (SSO) shall be changed to Covington and Associates Site Safety Officer (SSO). Mr. Denton Bates will be changed to Mr. John Szabo as the designated SSO for the project.

Refer to Page 5, Plan Approval - The document was prepared by W.D. Bates, Site Safety Officer on November 12, 2001. The Health and Safety Plan is approved and accepted by John Szabo, Site Safety Officer, with changes presented in this letter, on February 8, 2002.



COVINGTON AND ASSOCIATES CORPORATION
Requested Modifications to Health and Safety Plan
Former Gulfport Fertilizer Site, Gulfport, MS

February 8, 2002 /Page 2

Refer to Appendix B, Equipment Decontamination Procedures – Replace the Equipment Decontamination Procedures listed in Appendix B with the following modification. The following modification is an approved modification to the Work Plan.

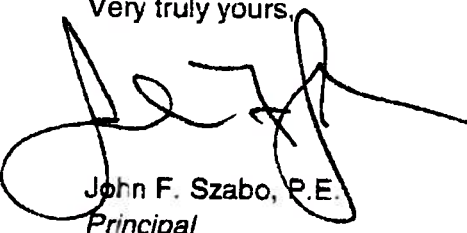
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- The core barrel will be washed in tap water containing liquinox. The core barrel will be thoroughly brushed to remove particulate matter and surface films.
- The core barrel will then be rinsed with clean tap water and allowed to air dry.

The cleaning solution and rinsate will be transferred to drums for characterization and disposal off-site in a permitted facility.

We hope that these requested modifications to the subject Health and Safety Plan meets with MDEQ's approval. If you have questions concerning any of these requested modifications, please contact us.

Very truly yours,



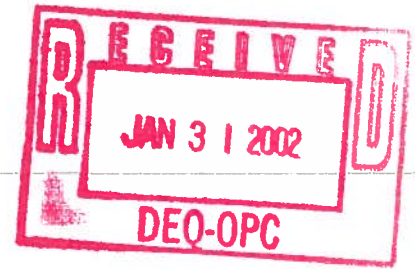
John F. Szabo, P.E.
Principal

cc: Joy Phillips, Hancock Bank

Covington & Associates Corporation
Environmental Engineers and Consultants

January 24, 2002

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385



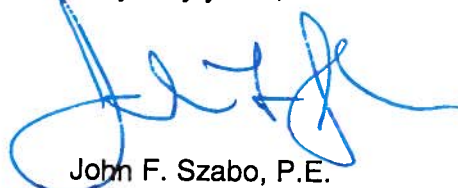
FILE COPY

**Re: Updated Project Schedule
Gulfport Fertilizer Site
Gulfport, Mississippi**

Dear Penny:

As we discussed this morning, I am sending you a project schedule, which has been updated to reflect collecting on-site samples beginning February 18, 2002. Please review and call me with any questions.

Very truly yours,



John F. Szabo, P.E.
Principal

ENCLOSURE

cc: Joy Phillips, Hancock Bank, w/o enclosure



Proposed Schedule
Gulfport Fertilizer Site
Gulfport, MS
Revised: January 24, 2002

Task	Date Begun	Date Completed
November - December 2001		
Submit Schedule for Site and NORM Delineation to MDEQ	11/5/01	11/5/01
Submit modifications/clarifications to Work Plan and Health & Safety Plan to MDEQ	11/20/01	11/20/01
Receive approval of modifications/clarifications from MDEQ	12/20/01	12/20/01
January 2002		
Obtain additional NORM samples	1/26/02	2/1/02
February 2002		
Perform on-site sampling	2/18/02	2/22/02
March 2002		
Prepare and submit NORM Survey Report	3/4/02	3/15/02
Receive and evaluate analyses from on-site sampling	3/4/02	3/15/02
Submit proposed monitoring well locations to MDEQ	3/11/02	3/11/02
Perform off-site sampling	3/11/02	3/15/02
Receive approval for monitoring well locations from MDEQ	3/15/02	3/15/02
Install six (6) monitoring wells	3/25/02	3/29/02
Receive and evaluate analyses from off-site sampling	3/25/02	4/3/02
April 2002		
Initial sampling of six (6) monitoring wells and existing MW-1 (1st Qtr.)	4/8/02	4/12/02
Prepare and submit Supplemental Site Characterization Report	4/8/02	5/15/02
May 2002		
Submit 1st Qtr. Sample Results	5/1/02	5/15/02
June 2002		
Perform 2nd Qtr. Sampling	6/17/02	6/21/02
July 2002		
Submit 2nd Qtr. Sample Results	7/3/02	7/12/02
September 2002		
Perform 3rd Qtr. Sampling	9/16/02	9/20/02
October 2002		
Submit 3rd Qtr. Sampling Results	10/2/02	10/14/02
December 2002		
Perform 4th Qtr. Sampling	12/16/02	12/20/02
January 2003		
Submit 4th Qtr. Sampling Results	1/1/03	1/14/03
Submit Annual Report (1st - 4th Qtrs.)	1/17/03	1/28/03
March 2003		
Perform 5th Qtr. Sampling	3/17/03	3/21/03
April 2003		
Submit 5th Qtr. Sampling Results	4/2/03	4/14/03
June 2003		
Perform 6th Qtr. Sampling	6/16/03	6/20/03
July 2003		
Submit 6th Qtr. Sampling Results	7/2/03	7/16/03
September 2003		
Perform 7th Qtr. Sampling	9/15/03	9/19/03
October 2003		
Submit 7th Qtr. Sampling Results	10/1/03	10/15/03
December 2003		
Perform 8th Qtr. Sampling	12/15/03	12/19/03
Submit 8th Qtr. Sampling Results	12/31/03	1/14/04
January 2004		
Submit Annual Report (4th - 8th Qtrs.)	1/19/04	2/4/04

Note: Schedule may be adjusted based on weather conditions during on-site sampling, off-site sampling and monitoring well installation and/or actual dates of receiving MDEQ approvals



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

January 31, 2002

Ms. Joy Lambert Phillips
Hancock Bank Of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: Gulfport Fertilizer Site
Response to MDEQ Letter of October 17, 2001, dated November 8, 2001, and Requested Modifications to Work Plan Off-Site/Source Area Soils and Groundwater Sampling dated November 20, 2001
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced documents submitted by Covington and Associates Corporation on behalf of Hancock Bank. MDEQ approves the modifications to the work plan, the proposed schedule for field work, and the proposed plan for addressing naturally occurring radioactive materials (NORM) at the site. MDEQ shall be provided the opportunity to observe field work and collect split samples. You shall provide MDEQ with appropriate sample containers and preservatives should MDEQ request to split samples. MDEQ shall be notified a minimum of two (2) weeks prior to conducting any field work. The field work is scheduled to begin the week of February 18, 2002. If you have questions or comments, or the scheduled date for field work changes, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E.

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Approval Letter for Field Work Schedule and Work Plan Modifications 1-30-02 (pj).doc

MDEQ

MDEQ

No. 38921736

Invoice
37469827

Reference

Inv Date
01/09/2002

Amount Paid
75.0

Check Date = 01/11/2002

Check Total = 75.0

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P.O. BOX 20325
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George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

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JAN 2002
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BUTLER SERVICES OF MISSISSIPPI, INC.

- Environmental Consulting Services -

January 8, 2002

Joy Lambert Phillips, General Counsel
Hancock Bank
One Hancock Plaza
P.O. Box 4019
Gulfport, MS 39502

FILE COPY



RE: Gulfport Fertilizer Site

Dear Joy,

Você presume Que. demasiado e está incorrecto, e eu não repito lá lima electronica.

It seems you do not understand English so I spelled it out to you in Portuguese but just in case I will give you the English translation.

You presume too much and it is incorrect, and I repeat there are no electronic files.

Denton brought to the office a computer he brought with him from California manufactured by AT&T. I had no idea they had ever been in the computer field however we put CAD release 14 on it and used it for drawing. We were working with a couple of developers and Architect. We did grading and drainage plans, water, sewer and other civil engineering work on Apartment complex,s. Denton's computer was not on line so the Architect would e-mail his drawing to me in a zip file which I would download to a floppy and load it on Denton,s computer to do the engineering phase. My computer was for developing documents needed whether it was an EIS, Phase I, storm water run runoff plans or tables and reports for DEQ.

Denton,s hard drive crashed and we lost all the drawing we had stored and the only backup files we had were the Architectual files I had downloaded. Denton and I still work together but he opened his own office and is working with a manufacturer from Atlanta,Ga. He left the AT&T here for several months as it was useless

Between the time I finished the H&S plan and I heard from you with your shopping list, I picked Up a virus that destroyed my hard drive on my Packard Bell with windows 98 and my wiped pout my records.

My daughter works at FGH,Inc.in Gulfport, they were infected and she unknowing passed it to me in e-mail.You can imagine what it did to them.

You told me when I visited with you in your office the bank wanted to put off anymore work (spending money) until the next millinimun if possible BUT Butler can,,t be blamed because we wrote a sampling plan so simple my 11year old Grandson could follow and one that was approved by DEQ. Depending on Penny Johnston's schedule, your consultants could have been in the field taking samples before Christmas.

You mentioned our Sub's Singley, EMS, Micro methods and others that may have files you could use. All they did was sample where we told them and put the number on the sample we told them and all Micro Methods did was to take a numbered sample we provided and analyze for what we told them to. All interperation of the raw data was proformed by Butler Services and

BUTLER SERVICES OF MISSISSIPPI, INC.

- Environmental Consulting Services -

put in the format required by the Uncontrolled Sites section of MSDEQ. Resources Engineering REM) is a California Corporation set up by Denton for Tax purposes, where he still banks and maintains a residency.

The files I had delivered to you belong to the Bank BUT they are under copy write by Butler Services of Mississippi, Inc and can't be changed except by written permission from us. I am using a Monorail manufactured by Rockwell with a Windows 95 program but with the present economic conditions I am not making any capital expenditure no matter what George W. says. Denton on the other hand bought about \$50,000 worth of new electronic equipment and office furniture and is looking for a good supply of salt as he may have to eat it. Good luck in 2002 and your career project.

Sincerely



Louis Fortenberry

✓ CC: Penny Jonnston DEQ Uncontrolled Sites



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

December 31, 2001

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

Invoice 37469827

FILE COPY

1 Staff hour @ \$75.00/Hr. for 11/01	\$75.00
--------------------------------------	---------

Total Amount Due	<u>\$75.00</u>
-------------------------	-----------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$75.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy



**HANCOCK
BANK**

JOY LAMBERT PHILLIPS
General Counsel

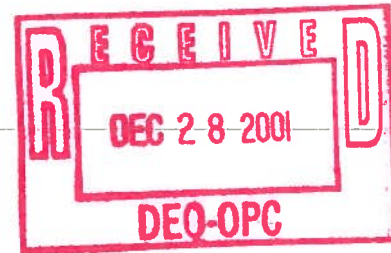
December 21, 2001

Via Facsimile (228-769-1219) and U. S. Mail

Louis Fortenberry
Butler Services of Mississippi, Inc.
P.O. Box 1164
Pascagoula, MS 39568-1164

Re: Gulfport Fertilizer Site

Dear Louis:



FILE COPY

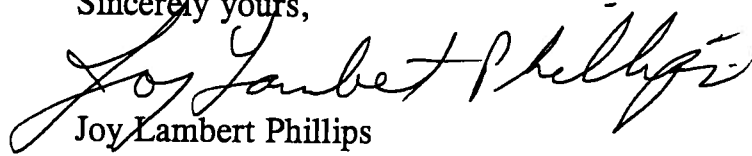
I received your letter dated December 5, 2001, along with the delivery of the box of materials. I reviewed the material in the box and there are no computer diskettes or other such data. In your letter you indicated that this was all of Butler Services' original file copies of the information related to the site. I am presuming from your letter that this also means you did not have any data on your computer or Denton Bates' computer. I therefore presume that the computer drawing files and survey data must have been prepared by a subcontractor and would be a part of their records and computer files. I apologize if my request was not specific enough. I had meant to encompass records both in your possession and those that may have been retained by the subcontractors that you contracted with on our behalf. In the box of materials that you had delivered, I saw a listing on a piece of paper of computer drawing files with file names. I also saw a reference to Resource Engineering and Management in Ocean Springs. I presume therefore that the drawings were done by Resource Engineering and Management and that they would have these records. Please accept this as an expansion of our previous request to you to include all of your subcontractors, including Resource Engineering and Management, EMS, and we also saw a reference to Singletary Construction. Obviously they must have information in a format that was not provided to you, and we need to receive that data. If they will not comply with your request please let me know and give me contact information and I will contact them directly. We are particularly interested in drawings files and survey data in computer format.

Louis Fortenberry
December 21, 2001
Page 2

As I have previously stated, we are concerned that without this information, particularly regarding the survey, there will be duplication of effort and additional costs and delays to the bank.

I look forward to hearing from you soon and hope your holidays are good.

Sincerely yours,



Joy Lambert Phillips
General Counsel

/jdr

c Leo W. Seal, Jr.
Charles A. Webb, Jr.
✓ Penny Johnston, DEQ

MDEQ

MDE

No. 830172062

Invoice 37469826
Reference

Inv Date 12/12/2001
Amount Paid 262.5

Check Date = 12/12/2001

Check Total = 262.5

NON NEGOTIABLE
CUSTOMER COPY

FILE COPY

THE BACK OF THIS DOCUMENT CONTAINS A REFLECTIVE SECURITY MARK • HOLD AT AN ANGLE TO VIEW



POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

No. 830172062

Issued By Integrated Payment Systems Inc. Englewood, Colorado
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

82-40/1021

**Two Hundred Sixty Two & 50/100 Dollars

PAY
TO THE
ORDER
OF

MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE 12/12/2001
AMOUNT *****262.50

George A. Schloegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

Gulfport Lighthouse

⑈ 252588 ⑈ ⑆ 102100400 ⑆ 68000830172062 ⑈





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

November 30, 2001

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Customer No. 3746-98

FILE COPY

Invoice 37469826

3.5 Staff hours @ \$75.00/Hr. for 10/01	\$262.50
---	----------

Total Amount Due	<u>\$262.50</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$262.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

Covington & Associates Corporation
Environmental Engineers and Consultants

November 20, 2001

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385



**Re: Requested Modifications to Work Plan
Off-Site/Source Area Soils
And Groundwater Sampling
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi**

FILE COPY

Dear Penny:

On behalf of Hancock Bank, Covington and Associates Corporation (CAC) has reviewed the subject Work Plan prepared by Butler Services of Mississippi, Inc. dated August 21, 2000 and revised December 18, 2000. This site plan was reviewed and approved by MDEQ in April 2001. The site investigation presented in the Work Plan is scheduled for to be conducted in February and March 2002. Prior to performing the site investigation, CAC is requesting that certain aspects of the Work Plan be modified. This letter presents the requested modifications and references the portions of the Work Plan where the requested modifications apply.

Refer to Work Plan All references to Butler Services of Mississippi, Inc. or Butler Services are to be changed to Covington & Associates Corporation.

Refer to Section 2.0 Objectives, pg. 3, 2nd para. which reads "In addition to the installation of six groundwater monitoring wells, conductivity probes and temporary monitoring wells ..." CAC requests that this be modified to read "In addition to the installation of six groundwater monitoring wells, soil borings and temporary monitoring wells ..."

Refer to Section 3.0 Investigative Activities, pg. 4, 1st para., 6th line, which reads "zone, advancing conductivity probes and the installation of ..." CAC requests that this be modified to read "zone, advancing soil borings and the installation of ..."

Refer to pg. 5, 2nd para., 3rd line, which reads "the specific grid points to mark where soil borings



COVINGTON AND ASSOCIATES CORPORATION
Requested Modifications to Work Plan
Former Gulfport Fertilizer Site, Gulfport, MS

November 20, 2001 /Page 2

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Refer to Section 3.2 Conductivity Survey Instead of the conductivity probing, CAC proposes advancing soil borings to twenty-foot depth (20') at the conductivity probe location shown in the Work Plan. The soil borings will be continuously sampled and logged to identify soil types and groundwater depth. After the soil boring is completed, the borehole will be grouted to the surface using cement-bentonite grout mix. Each location will be surveyed to determine its location with respect to the grid system established during previous investigations at this site and the ground surface elevation will be determined. All equipment will be decontaminated prior to moving to the next boring location.

Refer to Section 3.3 Soil Sampling and Delineation CAC will be using a geoprobe to advance soil borings. The geoprobe macro-core soil sampler will be 24-inch long by 2-inch diameter. Soil samples will be placed into laboratory supplied containers for analysis by Environmental Science Corporation, located in Mt. Juliet, Tennessee.

Refer to pg. 8, 1st para., 3^d line which reads "boring logs and to confirm data obtained from the conductivity survey." CAC requests that this read "boring logs."

Refer to pg. 8, 3^d para. Since a disposable acetate liner will be used for collecting soil samples, only the geoprobe's outer core barrel will need to be cleaned during sampling operations. The following cleaning procedure for drill rigs as presented in Appendix B, Section B.3.4 of the US EPA's Region IV's *Environmental Investigations Standard Operating Procedures and Quality Assurance Manual* will be followed after each soil interval is cored and the disposable acetate liner removed from the core barrel:

- The core barrel will be washed in tap water containing liquinox. The core barrel will be thoroughly brushed to remove particulate matter and surface films.
- The core barrel will then be rinsed with clean tap water and allowed to air dry.

The cleaning solution and rinsate will be transferred to drums for characterization and disposal off-site in a permitted facility.

Refer to pg. 8, Section 3.3.1 Off-Site Subsurface Soil Delineation, 1st para., underlined portion CAC does not propose to perform a survey of the off-site area prior to performing the investigation. During the off-site investigation, a sample grid as described in Section 3.1 will be established. Where sample locations are inaccessible, due to trees or other barriers, these locations will be moved to the closest available location where a soil boring can be advanced.

COVINGTON AND ASSOCIATES CORPORATION
Requested Modifications to Work Plan
Former Gulfport Fertilizer Site, Gulfport, MS

November 20, 2001 /Page 3

The actual soil boring location will be documented and surveyed in.

Refer to pg. 9, 2nd para. and pg. 11, top of page CAC will use Environmental Science Corporation in Mt. Juliet, Tennessee to analyze the samples.

Refer to pg. 9, 3rd para. and pg. 11, 1st para. The soil samples will also be analyzed for pH using USEPA Method SW846, 9040A

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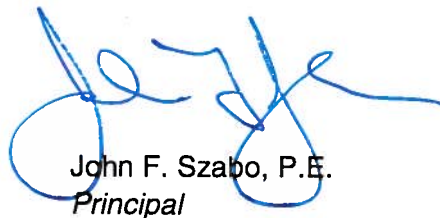
15 per John Szabo 1/24/02 PAJ
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Refer to Figure 1, Appendix PVC Well Screen and PVC Riser Pipe will be 2-inch and not the 4-inch shown.

It is our understanding that a revised Health & Safety Plan has been submitted by Butler Services of Mississippi, Inc. Once this plan has been reviewed by CAC, we will, if we have modifications, submit those modifications to MDEQ.

We hope that these requested modifications to the subject Work Plan meets with MDEQ's approval. If you have questions concerning any of these requested modifications, please contact us.

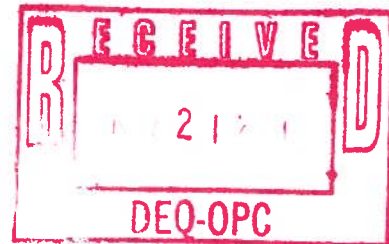
Very truly yours,



John F. Szabo, P.E.
Principal

cc: Joy Phillips, Hancock Bank

Covington & Associates Corporation
P.O. Box 177
Pass Christian, MS 39571
(228) 452-4999
(228) 452-0117 (fax)



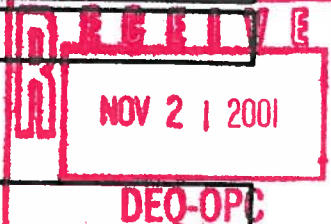
FACSIMILE COVER PAGE

To: Penny Johnston

From: John F. Szabo

Fax #: 1-601-961-~~5300~~ 5741

Company: MDEQ



Subject: Revision to Gulfport Fertilizer Site Work Plan

Sent: 11/20/01 at 6:00:04 PM

Pages: 4 (including cover)

MESSAGE:

FILE COPY

Penny,

I will be sending original to you tonight. Call me if you have any questions.

John

Covington & Associates Corporation

November 20, 2001

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

**Re: Requested Modifications to Work Plan
Off-Site/Source Area Soils
And Groundwater Sampling
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi**

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COVINGTON AND ASSOCIATES CORPORATION
Requested Modifications to Work Plan
Former Gulfport Fertilizer Site, Gulfport, MS

November 20, 2001 /Page 2

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COVINGTON AND ASSOCIATES CORPORATION
Requested Modifications to Work Plan
Former Gulfport Fertilizer Site, Gulfport, MS

November 20, 2001 /Page 3

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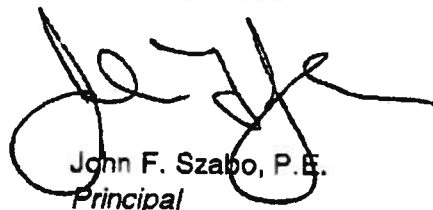
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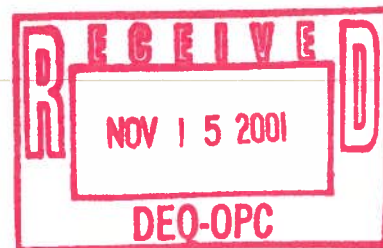
John F. Szabo, P.E.
Principal

cc: Joy Phillips, Hancock Bank

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

November 12, 2001

Mr. Tony Russell, Chief
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi



ATT: Ms Penelope Johnson, Project Engineer

RE: Revised Health & Safety Plan
Former Gulfport Fertilizer Plant
33rd Street
Gulfport, MS

FILE COPY

Dear Tony,

Attached is the amended Health & Safety Plan that responds to cold stress and also includes information provided to us by others concerning NORM. We believe this completes the request for corrections and additional information included in your letter of February 7, 2001 to Ms. Joy Lambert Phillips, in house counsel, for Hancock Bank.

This concludes our participation in this project so if there are further questions or request, they should be addressed to Ms. Joy Lambert Phillips who will forward them to whom ever she wishes to respond.

It has been a pleasure working with you and your staff of professionals on this project and look forward to working with you in the future.

Sincerely

Louis Fortenberry

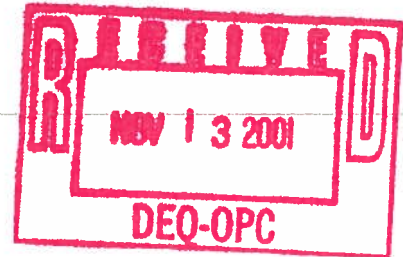
CC: Joy Lambert Phillips

Covington & Associates Corporation

Environmental Engineers and Consultants

November 8, 2001

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385



**Re: Response to MDEQ Letter dated October 17, 2001
Gulfport Fertilizer Site
Gulfport, Mississippi**

FILE COPY

Dear Penny:

On behalf of our client, Hancock Bank, Covington and Associates Corporation (CAC) is pleased to submit a schedule detailing when site delineation work will be conducted. The schedule is attached. As shown on the schedule, CAC is proposing to begin the on-site sampling during the first week of February 2002. Our client is in negotiations with a potential purchaser of part or all of the property. Part of the negotiations may include either the purchaser agreeing to perform some or all of the required site delineation work or the purchaser having additional investigation requirements beyond those approved by MDEQ. Our client feels that these negotiations should be concluded by mid to late January 2002 and is, therefore, requesting that the site delineation work does not begin until early February 2002.

We are also attaching two (2) drawings, which show information developed during the NORM survey of the site. Figure 1 shows the areas of the site having a NORM reading > 20 uR/hr (in red). The 100 meter square sampling grid having a significant concentration of NORM readings > 20 uR/hr was then sampled (NORM-1 through NORM-5) to determine whether Ra-226 concentrations in the 0"-6" depths and 6"-12" depths were above or below regulatory limits. Two samples (NORM-3 and NORM-5) were above regulatory limits. The area around NORM-3 and NORM-5 were sampled to determine the extent of site soil having Ra-226 concentrations above regulatory limits. The additional NORM samples, their Ra-226 reading and the approximate areal extent of the soils above regulatory limits are shown on Figure 2. During the on-site sampling in the first week of February 2002, CAC will take additional NORM samples in the area of NORM-3 and NORM-5 in order to better delineate the areal extent of soils with Ra-226 concentrations exceeding regulatory limits. In the Health and Safety Plan which will be submitted by November 16, 2001, CAC will propose marking and fencing off the



COVINGTON AND ASSOCIATES CORPORATION
Response to MDEQ Letter dated October 17, 2001
Former Gulfport Fertilizer Site, Gulfport, MS

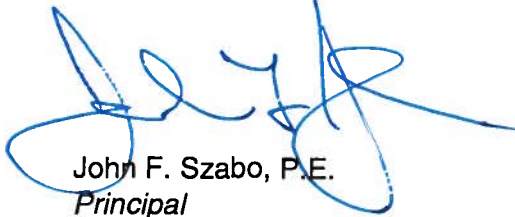
November 8, 2001 /Page 2

delineated areas shown on Figure 2 to prevent unauthorized personnel from entering these areas. CAC will also request that the NORM remediation work not be performed until the extent of lead and arsenic contamination in the site soils is delineated during the February 2002 sampling activities. This approach will allow CAC to investigate remediation options that may be effective for the NORM contamination as well as the lead and arsenic contamination, resulting in savings to the client.

On November 16, 2001, CAC will also be submitting requested modifications to the *Off-Site/Source Area Soils and Groundwater Sampling Work Plan*.

We look forward to working with you in evaluating the site and determining a solution, which is both cost effective for our client and is protective of the environment and humans. If you have any questions concerning information contained in this letter, please contact us.

Very truly yours,



John F. Szabo, P.E.
Principal

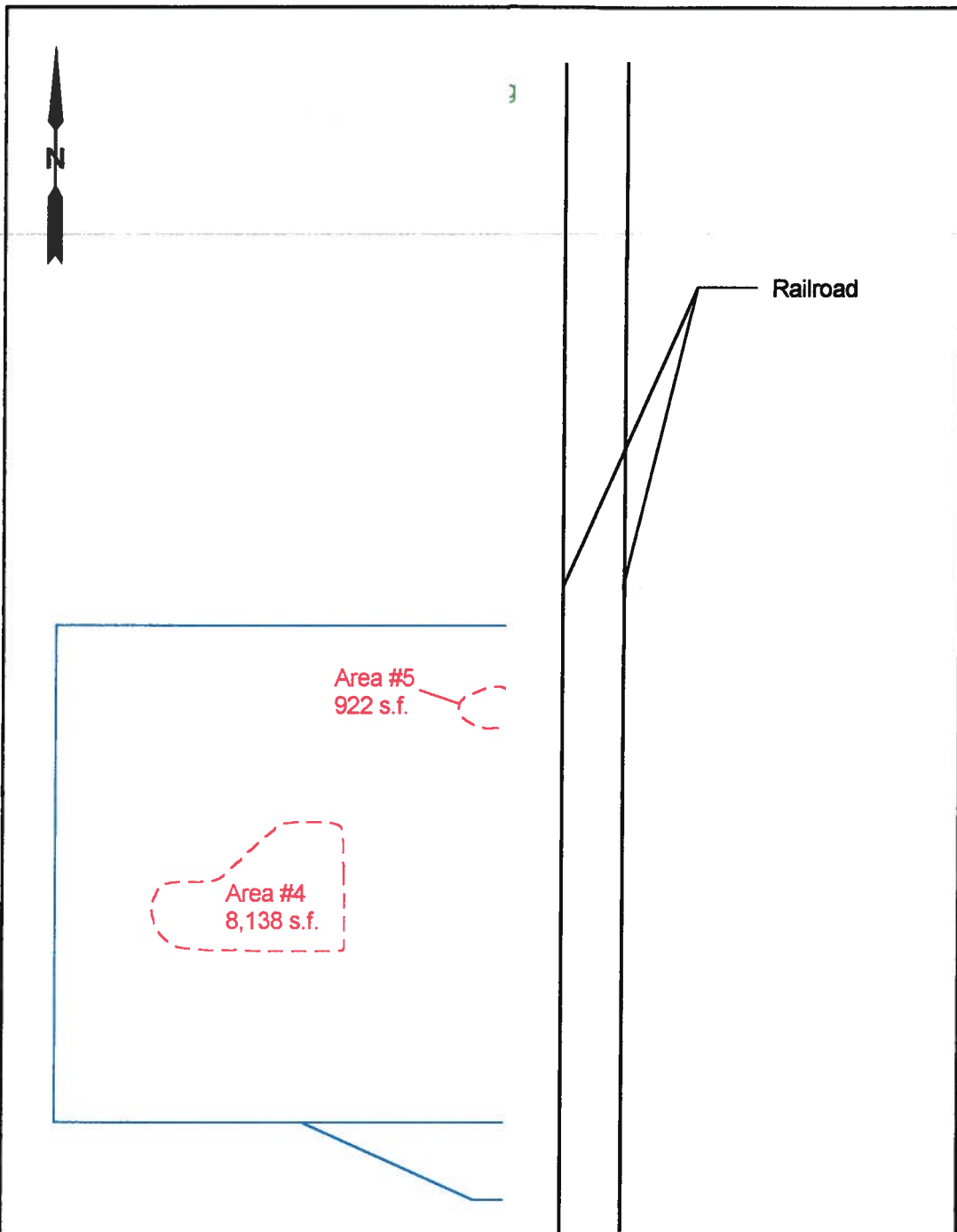
ENCLOSURES

cc: Joy Phillips, Hancock Bank, w/enclosures

**Proposed Schedule
Gulfport Fertilizer Site
Gulfport, MS**

Task	Date Begun	Date Completed
November - December 2001		
Submit Schedule for Site and NORM Delineation to MDEQ	11/5/01	11/5/01
Submit modifications/clarifications to Work Plan and Health & Safety Plan to MDEQ	11/20/01	11/20/01
Receive approval of modifications/clarifications from MDEQ	12/20/01	12/20/01
February 2002		
Perform on-site sampling, including NORM sampling	2/4/02	2/8/02
Receive and evaluate analyses from on-site sampling	2/18/02	3/1/02
Submit proposed monitoring well locations to MDEQ	2/25/02	2/25/02
Perform off-site sampling	2/25/02	3/1/02
March 2002		
Receive approval for monitoring well locations from MDEQ	3/1/02	3/1/02
Prepare and submit NORM Survey Report	3/4/02	3/15/02
Install six (6) monitoring wells	3/11/02	3/15/02
Receive and evaluate analyses from off-site sampling	3/11/02	3/20/02
Initial sampling of six (6) monitoring wells and existing MW-1 (1st Qtr.)	3/25/02	3/29/02
Prepare and submit <i>Supplemental Site Characterization Report</i>	3/25/02	5/1/02
April 2002		
Submit 1st Qtr. Sample Results	4/17/02	5/1/02
June 2002		
Perform 2nd Qtr. Sampling	6/3/02	6/7/02
Submit 2nd Qtr. Sample Results	6/19/02	6/28/02
September 2002		
Perform 3rd Qtr. Sampling	9/3/02	9/6/02
Submit 3rd Qtr. Sampling Results	9/18/02	9/30/02
December 2002		
Perform 4th Qtr. Sampling	12/2/02	12/6/02
Submit 4th Qtr. Sampling Results	12/18/02	12/31/02
January 2003		
Submit Annual Report (1st - 4th Qtrs.)	1/3/03	1/14/03
March 2003		
Perform 5th Qtr. Sampling	3/3/03	3/7/03
Submit 5th Qtr. Sampling Results	3/19/03	3/31/03
June 2003		
Perform 6th Qtr. Sampling	6/2/03	6/6/03
Submit 6th Qtr. Sampling Results	6/18/03	6/30/03
September 2003		
Perform 7th Qtr. Sampling	9/2/03	9/5/03
Submit 7th Qtr. Sampling Results	9/17/03	9/30/03
December 2003		
Perform 8th Qtr. Sampling	12/1/03	12/5/03
Submit 8th Qtr. Sampling Results	12/17/03	12/31/03
January 2004		
Submit Annual Report (4th - 8th Qtrs.)	1/5/04	1/21/04

Note: Schedule may be adjusted based on weather conditions during on-site sampling, off-site sampling and monitoring well installation.



LEGEND:

- Historical Site Facilities
- Area with NORM Reading > 1
- 100 Meter Square Sampling
- NORM-3 Sample Location and Design

COVINGTON & ASSOCIATES CORPORATION
PASS CHRISTIAN, MISSISSIPPI

FORMER GULFPORT FERTILIZER SITE
GULFPORT, MISSISSIPPI

NORM SURVEY

3/8/01	PROJECT NO.	CAC 8296.00
AS SHOWN	FILE: JFS/CAC/GULFPORT FERTILIZER/FIG. 1 NORM SURVEY.SHP	

FIG. 1

LEGEND

----- Area with NORM Reading > 2

----- Approx. Area > 5 pCi/gm (0"-6"

----- Approx. Area > 15 pCi/gm (6"-



Sample Location and Designation

NORM-5, 30' S

6.74 Ra-228 Reading (0"-6" depth)

10.71 Ra-228 Reading (6"-12" depth)



NOTES

1. See Figure 1 for location of NORM-3

NO

COVINGTON & ASSOCIATES CORPORATION
PASS CHRISTIAN, MISSISSIPPI

FORMER GULFPORT FERTILIZER SITE
GULFPORT, MISSISSIPPI

NORM SAMPLING

3/8/01

PROJECT NO. CAC 8298.00

AS SHOWN

FILE JFSCAC/GULFPORT FERTILIZER/FIG 2 NORM SAMPLING SK

FIG. 2

Covington & Associates Corporation
P.O. Box 177
Pass Christian, MS 39571
(228) 452-4999
(228) 452-0117 (fax)

FILE COPY**FACSIMILE COVER PAGE****To:** Penny Johnston**From:** John F. Szabo**Fax #:** 1-601-961-5300**Company:** MDEQ**Subject:** Response to MDEQ Letter of October 17, 2001 - Gulfport Fertilizer Site**Sent:** 11/8/01 at 11:21:00 AM**Pages:** 4 (including cover)**MESSAGE:**

Penny,

The original of this letter along with the referenced Figures will be mailed to you today and should be there when you get back next Tuesday or Wednesday. Call me if you have questions.

John

Covington & Associates Corporation

November 8, 2001

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

**Re: Response to MDEQ Letter dated October 17, 2001
Gulfport Fertilizer Site
Gulfport, Mississippi**

Dear Penny:

On behalf of our client, Hancock Bank, Covington and Associates Corporation (CAC) is pleased to submit a schedule detailing when site delineation work will be conducted. The schedule is attached. As shown on the schedule, CAC is proposing to begin the on-site sampling during the first week of February 2002. Our client is in negotiations with a potential purchaser of part or all of the property. Part of the negotiations may include either the purchaser agreeing to perform some or all of the required site delineation work or the purchaser having additional investigation requirements beyond those approved by MDEQ. Our client feels that these negotiations should be concluded by mid to late January 2002 and is, therefore, requesting that the site delineation work does not begin until early February 2002.

We are also attaching two (2) drawings, which show information developed during the NORM survey of the site. Figure 1 shows the areas of the site having a NORM reading > 20 uR/hr (in red). The 100 meter square sampling grid having a significant concentration of NORM readings > 20 uR/hr was then sampled (NORM-1 through NORM-5) to determine whether Ra-228 concentrations in the 0"-6" depths and 6"-12" depths were above or below regulatory limits. Two samples (NORM-3 and NORM-5) were above regulatory limits. The area around NORM-3 and NORM-5 were sampled to determine the extent of site soil having Ra-228 concentrations above regulatory limits. The additional NORM samples, their Ra-228 reading and the approximate areal extent of the soils above regulatory limits are shown on Figure 2. During the on-site sampling in the first week of February 2002, CAC will take additional NORM samples in the area of NORM-3 and NORM-5 in order to better delineate the areal extent of soils with Ra-228 concentrations exceeding regulatory limits. In the Health and Safety Plan which will be submitted by November 16, 2001, CAC will propose marking and fencing off the



COVINGTON AND ASSOCIATES CORPORATION
Response to MDEQ Letter dated October 17, 2001
Former Gulfport Fertilizer Site, Gulfport, MS

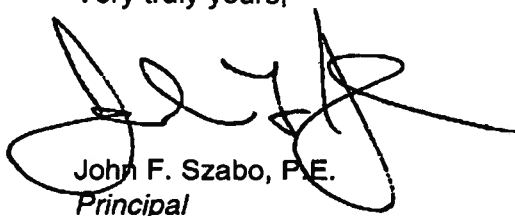
November 8, 2001 /Page 2

delineated areas shown on Figure 2 to prevent unauthorized personnel from entering these areas. CAC will also request that the NORM remediation work not be performed until the extent of lead and arsenic contamination in the site soils is delineated during the February 2002 sampling activities. This approach will allow CAC to investigate remediation options that may be effective for the NORM contamination as well as the lead and arsenic contamination, resulting in savings to the client.

On November 16, 2001, CAC will also be submitting requested modifications to the *Off-Site/Source Area Soils and Groundwater Sampling Work Plan*.

We look forward to working with you in evaluating the site and determining a solution, which is both cost effective for our client and is protective of the environment and humans. If you have any questions concerning information contained in this letter, please contact us.

Very truly yours,



John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank, w/enclosures

**Proposed Schedule
Gulfport Fertilizer Site
Gulfport, MS**

Task	Date Begun	Date Completed
November - December 2001		
Submit Schedule for Site and NORM Delineation to MDEQ	11/5/01	11/5/01
Submit modifications/clarifications to Work Plan and Health & Safety Plan to MDEQ	11/20/01	11/20/01
Receive approval of modifications/clarifications from MDEQ	12/20/01	12/20/01
February 2002		
Perform on-site sampling, including NORM sampling	2/4/02	2/8/02
Receive and evaluate analyses from on-site sampling	2/18/02	3/1/02
Submit proposed monitoring well locations to MDEQ	2/25/02	2/25/02
Perform off-site sampling	2/25/02	3/1/02
March 2002		
Receive approval for monitoring well locations from MDEQ	3/1/02	3/1/02
Prepare and submit NORM Survey Report	3/4/02	3/15/02
Install six (6) monitoring wells	3/11/02	3/15/02
Receive and evaluate analyses from off-site sampling	3/11/02	3/20/02
Initial sampling of six (6) monitoring wells and existing MW-1 (1st Qtr.)	3/25/02	3/29/02
Prepare and submit <i>Supplemental Site Characterization Report</i>	3/25/02	5/1/02
April 2002		
Submit 1st Qtr. Sample Results	4/17/02	5/1/02
June 2002		
Perform 2nd Qtr. Sampling	6/3/02	6/7/02
Submit 2nd Qtr. Sample Results	6/19/02	6/28/02
September 2002		
Perform 3rd Qtr. Sampling	9/3/02	9/6/02
Submit 3rd Qtr. Sampling Results	9/18/02	9/30/02
December 2002		
Perform 4th Qtr. Sampling	12/2/02	12/6/02
Submit 4th Qtr. Sampling Results	12/18/02	12/31/02
January 2003		
Submit Annual Report (1st - 4th Qtrs.)	1/3/03	1/14/03
March 2003		
Perform 5th Qtr. Sampling	3/3/03	3/7/03
Submit 5th Qtr. Sampling Results	3/19/03	3/31/03
June 2003		
Perform 6th Qtr. Sampling	6/2/03	6/6/03
Submit 6th Qtr. Sampling Results	6/18/03	6/30/03
September 2003		
Perform 7th Qtr. Sampling	9/2/03	9/5/03
Submit 7th Qtr. Sampling Results	9/17/03	9/30/03
December 2003		
Perform 8th Qtr. Sampling	12/1/03	12/5/03
Submit 8th Qtr. Sampling Results	12/17/03	12/31/03
January 2004		
Submit Annual Report (4th - 8th Qtrs.)	1/5/04	1/21/04

Note: Schedule may be adjusted based on weather conditions during on-site sampling, off-site sampling and monitoring well installation.

HANCOCK BANK LEGAL OFFICE

FACSIMILE TRANSMITTAL SHEET

**THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS LEGALLY PRIVILEGED
AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL
OR ENTITY NAMED BELOW.**

**IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY
TELEPHONE.**

Date:

11/1/01

To:

Reiny Johnston

Fax No.:

601. 961. 5300

From: Joy Lambert Phillips

Phone: 228-868-4445

Fax 228-868-4496

Number of Pages Transmitting: (Including cover page)

2

**If you do not receive the number of pages specified above, or if there are any
other problems with this transmission, please contact Jennifer Rahrer at 228-
868-4445.**

Comments:

**HANCOCK
BANK**JOY LAMBERT PHILLIPS
General Counsel

October 31, 2001


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

RE: Gulfport Fertilizer Plant

Dear Penny:

By now you have received a voice mail from me and probably had a conversation with John Szabo of Covington and Associates. After receiving Tony Russell's letter dated October 17, 2001, which we received October 19, 2001, Hancock Bank made the decision that it would be more cost effective to handle the NORM issues and the arsenic and lead delineation work together, as opposed to handling it piece-meal and therefore we have made the decision to use Covington & Associates as our consultant on this entire project. I have advised Louis Fortenberry of Butler Services of this decision and he has offered to revise the health and safety plan to include the NORM issues and the hypothermia issues that you had previously raised. He will forward these to you. As always, we appreciate your assistance and advice on this project and wanted you to be aware of this change in consultants. I look forward to visiting with you in the near future on these issues.

Sincerely,


Joy Lambert Phillips
General Counsel

/jdr

c Charles A. Webb, Jr.
Rimmer Covington
Louis Fortenberry

G:\Legal\99.117 Gulfport Fertilizer\Johnston.10.31.01.doc

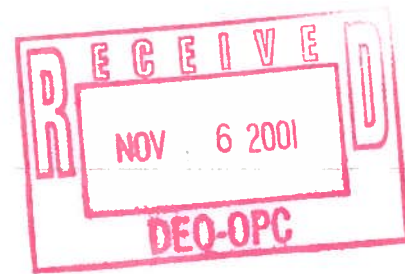
One Hancock Plaza / Post Office Box 4019 / Gulfport, MS 39502
228-868-4445 / Fax 228-868-4496 / 1-800-522-6542





JOY LAMBERT PHILLIPS
General Counsel

October 31, 2001



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

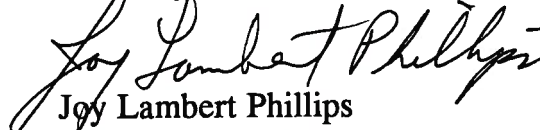
FILE COPY

RE: Gulfport Fertilizer Plant

Dear Penny:

By now you have received a voice mail from me and probably had a conversation with John Szabo of Covington and Associates. After receiving Tony Russell's letter dated October 17, 2001, which we received October 19, 2001, Hancock Bank made the decision that it would be more cost effective to handle the NORM issues and the arsenic and lead delineation work together, as opposed to handling it piece-meal and therefore we have made the decision to use Covington & Associates as our consultant on this entire project. I have advised Louis Fortenberry of Butler Services of this decision and he has offered to revise the health and safety plan to include the NORM issues and the hypothermia issues that you had previously raised. He will forward these to you. As always, we appreciate your assistance and advice on this project and wanted you to be aware of this change in consultants. I look forward to visiting with you in the near future on these issues.

Sincerely,


Joy Lambert Phillips
General Counsel

/jdr

c Charles A. Webb, Jr.
Rimmer Covington
Louis Fortenberry

G:\Legal\99.117 Gulfport Fertilizer\Johnston.10.31.01.doc



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

October 17, 2001

CERTIFIED MAIL NO. 7000 1670 0009 6843 8531 RETURN RECEIPT REQUESTED

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: Gulfport Fertilizer Site
Off-Site/Source Area Soils and Groundwater Sampling Work Plan dated
December 18, 2000, *Map of Proposed Sampling Locations* dated March 21,
2001, Naturally Occurring Radioactive Materials (NORM) Delineation Survey
Report/Work Plan, and Revised Health and Safety Plan
Gulfport, Mississippi

Dear Ms. Phillips:

It has been approximately six (6) months since the NORM survey was completed by Covington & Associates and the proposed sampling locations for the site delineation were approved by MDEQ. In order to keep the review of this site moving at an expedited pace, please submit a schedule detailing when the site delineation work and the NORM remediation work will be conducted to the Mississippi Department of Environmental Quality (MDEQ) for review and approval within fourteen (14) calendar days of receipt of this letter. A NORM survey report, including a work plan for any necessary NORM remediation work, shall be submitted to MDEQ for review and approval by November 16, 2001. A revised health and safety plan, including requirements and recommendations from the NORM survey, shall be submitted to MDEQ within fourteen (14) calendar days of MDEQ's approval of the NORM survey report/work plan. If you have any questions or comments, you may contact Penny Johnston at (601) 961-5388.

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Branch

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Requirement Letter 10-16-01 (pj).doc

OCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594
MS DEPT ENV
Invoice
37469825
Reference

Check Date = 07/10/01

Inv Date
07/05/01

No. 1.
Amou

Check Total = -----

FILE COPY

THE BACK OF THIS DOCUMENT CONTAINS A REFLECTIVE SECURITY MARK • HOLD AT AN ANGLE TO VIEW

HANCOCK BANK.
POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OAS, ATTN. FEE SECTION
P.O. BOX 20325
JACKSON, MS 39289-1325

DATE
07/10/01

AMOUNT
*****37.50

Authorized Signature
Agent for Integrated Payment Systems Inc.

George A. Schlegel

1125588 102100400 68000112569491

Received by
Fees 7-13-01
per Suzanne Polander



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

June 30, 2001

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469825

.5 Staff hour @ \$75.00/Hr. for 05/01	\$37.50
Total Amount Due	<u>\$37.50</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$37.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

No. 11256635

Invoice
37469824

Reference

Inv Date
05/08/01

Amount Paid
1,125.00

Check Date = 05/09/01

Check Total = 1,125.00

FILE COPY

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No. 11256635

POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

Issued by Integrated Payment Systems Inc., Englewood, Colorado 82-4010;
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

HANCOCK BANK \$1,125dols00cts

DATE
05/09/01

AMOUNT
****1,125.00

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

George A. Schlegel

Authorized Signature
Agent for Integrated Payment Systems Inc.

⑈ 252588⑈ ⑆ 102100400⑆ 68000112566358⑈





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

April 30, 2001

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469824

15 Staff hours @ \$75.00/Hr. for 03/01	\$1,125.00
Current Amount Due	<u>\$1,125.00</u>

Past due: Invoice #37469823 dated March 30, 2001 for: \$525.00

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$1,650.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

MDEQ



No. 222718

Invoice
37469823

Reference

Inv Date
04/04/01

Amount Paid
525.00

Check Date = 04/05/01

Check Total = 525.00

FILE COPY

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 222718

HANCOCK BANK \$525dols00cts

DATE

AMOUNT

04/05/01

*****525.00

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

⑈0222718⑈ ⑆06550368⑆ 01 0129100⑈

George A. Feltner





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

March 30, 2001

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469823

7 Staff hours @ \$75.00/Hr. for 02/01	\$525.00
---------------------------------------	----------

Total Amount Due	<u>\$525.00</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$525.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy



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

March 28, 2001

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: Gulfport Fertilizer Site
Map of Proposed Sampling Locations dated March 21, 2001
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced figure submitted by Butler Services of Mississippi, Incorporated on behalf of Hancock Bank. The proposed boring locations are approved. If you have any questions or comments, you may contact Penny Johnston at (601) 961-5388.

Sincerely,

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

Tony Russell, Chief
Uncontrolled Sites Section

cc: Denton Bates, P.E. Butler Services

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Proposed Boring Locations Approval Letter 3-26-01 (p).doc

MDEQ

MDEQ

No. 221244

Invoice
37469822

Reference

Inv Date
03/08/01

Amount Paid
750.00

Check Date = 03/08/01

Check Total =

750.00

FILE COPY

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 221244

HANCOCK BANK \$750dols00cts

DATE

AMOUNT

03/08/01

*****750.00

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

⑈0221244⑈ ⑆065503681⑆ 01 0129100⑈

George A. Blumel



Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

March 21, 2001



Mr. Tony Russell, Chief
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
PO Box 10385
Jackson, Mississippi 39289-0385

ATTN.: Ms. Penelope Johnston, Project Officer

FILE COPY

RE: Revised Off-Site and Intermediate Sample Plan Map
Gulfport Fertilizer Plant, 33rd Street, Gulfport, Mississippi

Dear Tony:

We are transmitting herewith two (2) copies of the revised "*Off-site and Intermediate Sample Plan*" drawing No.: 98HB033, pursuant to the comments and requirements contained in your letter of March 7, 2001. In regard to your comment concerning the progress of this investigation, we have been and continue to be very concerned about the progress of this project.

If you should have any questions or require any additional information, please do not hesitate to contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely yours.

BUTLER SERVICES OF MISSISSIPPI, INC.

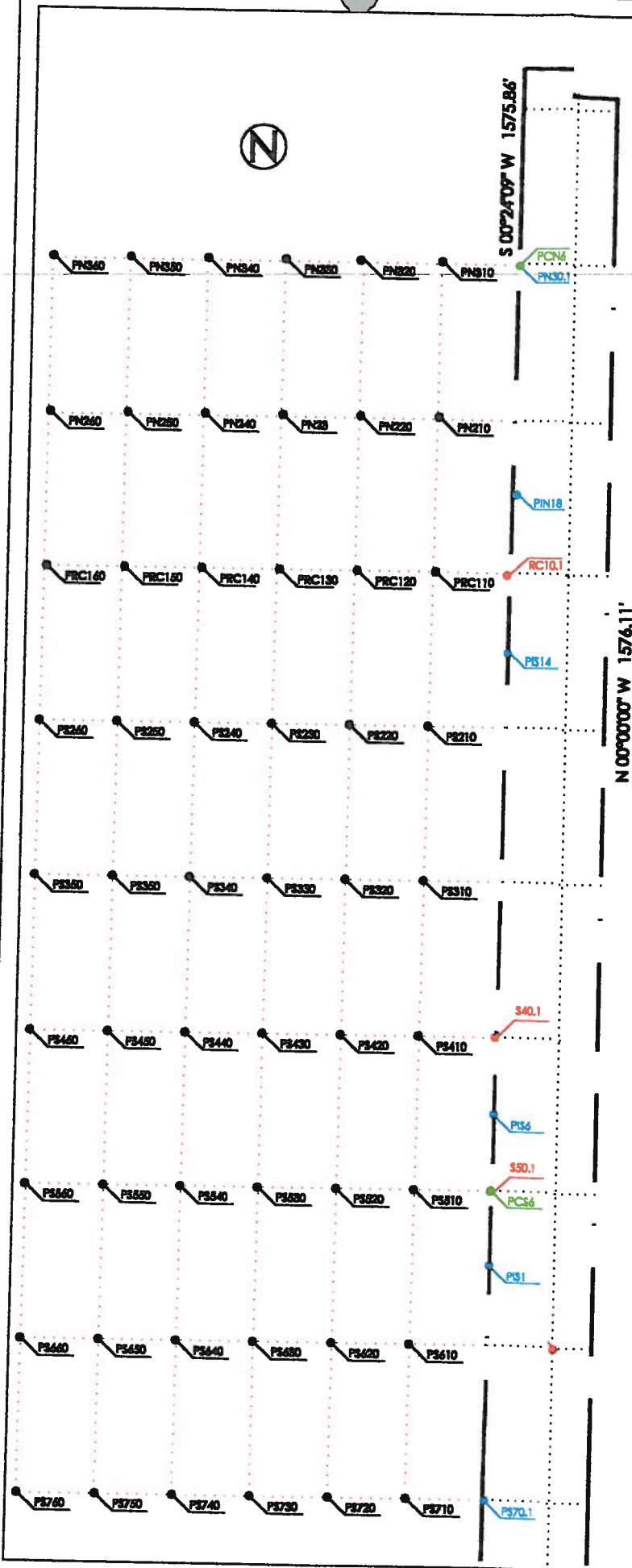
William D. Bates,

William D. Bates, P.E.
Project Manager

WDB:ib

Attachments: Off-site and Intermediate Sample Plan" drawing No.: 98HB033, Revised March 21, 2001.

cc: Ms. Joy Phillips, Esq., General Counsel, Hancock Bank w/attachments
Mr. Charles Webb, Executive Vice President, Hancock Bank



LEGEND

- Proposed Intermediate Sample Locations - Table 2
- Proposed Sample Locations at Depth - Table 1
- Proposed Other Sample Locations
- Proposed Conductivity Sample Locations
- Proposed Other Sample Grid
- Other Sample Grid
- Property Boundary

RECEIVED
MAR 23 2001
DEQ-OPC

FILE COPY

BUTLER SERVICES OF MISSISSIPPI, INC.
Engineering & Environmental Consultants

POST OFFICE BOX 1164
PASCAGOULA, MS 39568-1164
TELEPHONE (228) 769-6983
BUTLERSO@AOL.COM

Former Gulfport Fertilizer Plant
Offsite & Intermediate Sample Plan
Gulfport

DATE	BY	REVISION
02/18/2001	AE	WDB

02/18/2001
1" = 100'
AE
WDB
99HB003
1 OF 1



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

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PJ*
DATE: March 7, 2001
SUBJECT: Site Visit

On March 1, 2001, I traveled to the above referenced site to witness the NORM survey of the site. Mr. Rimmer Covington and Mr. John Szabo of Covington & Associates were on site to conduct the survey. The survey was conducted by collecting background readings in an unaffected area of the site (the southern section) and then collecting readings in the affected areas by moving across the site in rows in an East-West direction. Areas with readings of 16 $\mu\text{R/hr}$ were flagged. After the site was assessed, areas that were flagged were revisited to determine the extent of the "hot spot" ($> 20 \mu\text{R/hr}$). Once the areas with readings greater than 20 $\mu\text{R/hr}$ were flagged off, the areas were measured and a sketch of the areas was made. The sketch will be used to determine the sample locations. In the next few weeks, a work plan will be submitted to MDEQ for review and approval detailing the locations to be sampled.

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Site Visit Memo 3-7-01 (pj).doc



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

March 7, 2001

FILE COPY

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Site
Map of Proposed Sampling Locations dated February 22, 2001
Gulfport, Mississippi

Dear Ms. Phillips:

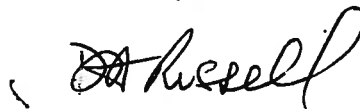
The Mississippi Department of Environmental Quality has reviewed the above referenced figure submitted by Butler Services of Mississippi, Incorporated on behalf of Hancock Bank. The review of this figure has generated the following comments/requirement:

1. The figure does not include the boring locations contained in Table 1, *Proposed Sampling Locations at Depth*, of the *Off-Site/Source Area Soils and Groundwater Sampling Work Plan* dated December 18, 2000.
2. The figure does not contain the proposed boring locations for the conductivity survey.
3. The figure does not indicate the location of the following proposed borings as listed in Table 2, *Proposed Intermediate Sampling Locations*, of the *Off-Site/Source Area Soils and Groundwater Sampling Work Plan* dated December 18, 2000:
 - a. 50 feet East of boring 31S15, and
 - b. 50 feet West of boring S16.

4. The figure shows the following proposed intermediate boring locations not listed in Table 2, *Proposed Intermediate Sampling Locations*, of the *Off-Site/Source Area Soils and Groundwater Sampling Work Plan* dated December 18, 2000:
 - a. PIS17 (50 feet North of boring S16),
 - b. PIS13 (50 feet East of boring S16),
 - c. PIN22 (100 feet West of boring 31N29), and
 - d. PIS70 (100 feet South of boring S60).
5. The figure shows proposed boring locations N20 and S70 as the proposed intermediate borings listed as 4c and 4d above.

Two copies of the corrected figure shall be submitted to MDEQ for review and approval by March 23, 2001. The MDEQ is still concerned about the progress of the investigation. The above referenced figure was initially requested in November 2000. If you have any questions or comments, you may contact Penny Johnston at (601) 961-5388.

Sincerely,




Tony Russell, Chief
Uncontrolled Sites Section

cc: Denton Bates, P.E. Butler Services

FAX

*Let 3-7-01
10:50am*

<p>To:</p> <p><u>Joy Phillips</u></p> <p><u>Hancock Bank - Gulfport</u></p> <p>_____</p> <p>_____</p> <p>Phone: <u>(228)-868-4445</u></p> <p>Fax: <u>(228)-868-4496</u></p>	<p>From:</p> <p><u>Denny Johnston</u></p> <p>Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385</p>  <p>MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY</p> <p>Phone: (601) 961- <u>5388</u></p> <p>Fax: (601) 961-5300</p>
---	--

Date: March 7, 2001

☒ Routine

☐ Priority

Number of pages, including this one: 3

Messages: This is MDEQ's comment/regulcement letter regarding
the figure submitted by Butler Services. Please call if you have any
questions. Have a great day!



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

February 28, 2001

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469822

10 Staff hours @ \$75.00/Hr. for 01/01	\$750.00
--	----------

Total Amount Due	<u>\$750.00</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$750.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

February 22, 2001

Mr. Tony Russell, Chief
Uncontrolled Sites
Office of Pollution Control
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RE: Gulfport Fertilizer Site
Letter 2-7-01

Dear Mr. Russell,

Attached is our proposed sampling locations for the next phase of the site characterization. We will respond to the other issues within 14 calendar days after receiving the data on the NORM survey.

Sincerely



Louis Fortenberry

CC: Joy Phillips / attachments
Charles Webb W/O attachments



FILE COPY

MS DEPT ENV

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL

No. 219895

Invoice
37469821

Reference

Inv Date
02/08/01

Amount Paid
150.00

Check Date = 02/16/01

Check Total = 150.00

HANCOCK BANK

POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 219895

HANCOCK BANK \$150dols00cts

PAY
TO THE
ORDER
OF:

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY
OAS, ATTN: FEE SECTION
P.O. BOX 20325
JACKSON, MS 39289-1325

DATE

02/16/01

AMOUNT

*****150.00

⑈0219895⑈ ⑆065503681⑆ 01 0129100⑈

George A. Schlegel



FILE COPY



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

February 7, 2001

FILE COPY

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Site
Norm Survey Work Plan received by MDEQ December 27, 2000
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced work plan submitted by Covington & Associates Corporation on behalf of Hancock Bank. The work plan is approved. The MDEQ shall be provided the opportunity to observe all field work and collect split samples. MDEQ shall be provided with appropriate sample containers and preservatives should MDEQ request to split samples. MDEQ shall be notified a minimum of two (2) weeks prior to conducting any field work. If you have any questions or comments, you may contact Penny Johnston at (601) 961-5388.

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Section

cc: Mr. John F. Szabo, P.E. Covington & Associates Corporation

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Norm Survey Work Plan Approval Letter 2-2-01
(pj).doc



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

February 7, 2001

FILE COPY

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Site
Off-Site/Source Area Soils and Groundwater Sampling Work Plan
dated December 18, 2000
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced work plan submitted by Butler Services of Mississippi, Incorporated on behalf of Hancock Bank. The MDEQ conditional approval of the above referenced work plan is contingent on the incorporation of the following requirements:

1. A figure showing all proposed boring locations, on and off site, must be submitted to MDEQ for review and approval by February 23, 2001.
2. The Health and Safety Plan (HASP) shall be amended to include the following items and corrections. The amended HASP shall be submitted to MDEQ for review and approval within 14 calendar days of receiving the NORM survey results.
 - a. The HASP shall include all requirements and recommendations of the Naturally Occurring Radioactive Materials (NORM) survey.
 - b. The HASP shall include protocols used to counter cold stress.
 - c. Due to problems that may occur when dialing 911 from cellular telephones, the phone numbers for the City of Gulfport Fire Department and Police Department shall be corrected to include

Letter to Ms. Joy Lambert Phillips

February 7, 2001

Page 2

the seven digit emergency number in addition to the 911 number.

- d. Table 1 lists the highest observed arsenic concentration as 325 ppm. ~~The table shall be corrected to show the highest observed arsenic concentration as 702 ppm.~~
- e. Under the Physical Hazards heading, the first sentence was left uncompleted. The sentence shall be completed.

If you have any questions or comments, you may contact Penny Johnston at (601) 961-5388.

Sincerely,




Tony Russell, Chief
Uncontrolled Sites Section

cc: Mr. Denton Bates, P.E. Butler Services of Mississippi, Incorporated

FAX

*Let PJ
HODM*

<p>To:</p> <p><u>Jay Phillips</u></p> <p><u>Hancock Bank-Gulfport</u></p> <p><u>Legal Department</u></p> <p>Phone: <u>(228)- 868-4445</u></p> <p>Fax: <u>(228)- 868-4496</u></p>	<p>From: <u>Penny Johnston</u></p> <div style="text-align: center;">  <p>MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY</p> </div> <p>Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385</p> <p>Phone: (601) 961- <u>5388</u></p> <p>Fax: (601) 961-5300</p>
--	--

Date: February 16, 2001

☒ Routine

☐ Priority

Number of pages, including this one: 4

FILE COPY

Messages: These are the approval letters for the work
at site. Have a GREAT Day! Call if you have any
questions.
Penny

MDEQ

MDEQ

No. 219200

Invoice
37469820

Reference

Inv Date
01/31/01

Amount Paid
637.50

Check Date = 01/31/01

Check Total = 637.50

FILE COPY

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 219200

HANCOCK BANK
637dols50cts

DATE

AMOUNT

01/31/01

*****637.50

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

⑈0219200⑈ ⑆065503681⑆ 01 0129100⑈

George A. Gillig





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

January 31, 2001

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469821

2 Staff hours @ \$75.00/Hr. for 12/00	\$150.00
---------------------------------------	----------

Current Amount Due	<u>\$150.00</u>
---------------------------	------------------------

Past due: Invoice #37469820 dated December 29, 2000 for: \$637.50

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$787.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy



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

December 29, 2000

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469820

8.5 Staff hours @ \$75.00/Hr. for 11/00	\$637.50
Total Amount Due	<u>\$637.50</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$637.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

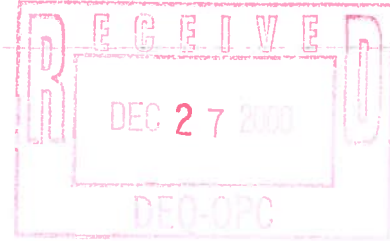
cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy



JOY LAMBERT PHILLIPS
General Counsel

December 22, 2000

FILE COPY



Penelope "Penny" Johnston
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-385

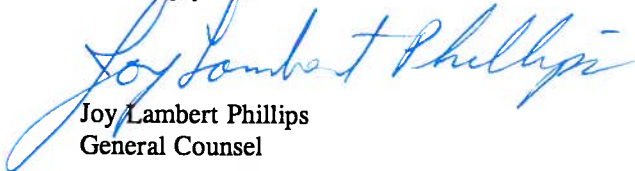
RE: Gulfport Fertilizer Site

Dear Penny:

Please find enclosed herewith two copies of the revised work plan prepared by Butler Services of Mississippi, Inc. in response to MDEQ's letter of November 28, 2000. You will also find enclosed two copies of the work plan for the NORM Survey, which was prepared by Covington and Associates Corporation. It is our hope that the combination of the two work plans will adequately respond to MDEQ's letter of November 28, 2000. Please do not hesitate to contact me if there are any questions or issues regarding this information, or if you prefer, you can direct questions to Butler Services or Covington and Associates, as appropriate.

As always, we thank you for your courtesies in what we realize has been a lengthy process. We look forward to hearing from you once you have had an opportunity to review these work plans. In the meantime, Happy Holidays.

Sincerely yours,



Joy Lambert Phillips
General Counsel

JLP/bc

Enclosures

cc: Tony Russell
Mr. Charlie Webb w/enclosures
Louis Fortenberry w/NORM enclosure
Rimmer Covington
Trudy Fisher w/enclosures

G:\Legal\99.117

**WORK PLAN
NORM Survey
Former Gulfport Fertilizer Plant Site
Gulfport, MS**

FILE COPY

The 33.06-acre former Gulfport Fertilizer Plant Site in Gulfport, MS is suspected to have areas of Naturally Occurring Radioactive Material (NORM) due to previous production of sulfuric acid and superphosphate fertilizer on the site. This Work Plan presents procedures, which will be followed by Covington & Associates Corporation (CAC), for performing a NORM survey of the site. The NORM survey will seek to identify if there are any areas on the site where radioactive material in the soil exceeds the regulatory limit (5 pCi/g), which prohibits transferring property for unrestricted use. The Division of Radiological Health, Bureau of Environmental Health, Mississippi State Department of Health establish this regulatory limit in the "Regulations for Control of Radiation in Mississippi".

Background: A Phase I Environmental Site Assessment (ESA) of the subject property was performed by CAC in May and June 1995. Since the property had previously been used to manufacture superphosphate fertilizer, radiation readings were taken by CAC personnel in several areas of the site. Background radiation readings were taken at the northern and southern ends of the property, where no manufacturing occurred. Background readings were 6 uR/hr. Radiation readings taken in areas of the site where phosphorus rock was unloaded, stored and processed ranged from 15 uR/hr to 40 uR/hr. Based on this information, CAC recommended that a NORM survey be performed to determine if there are areas of the site having radiation levels exceeding 5 pCi/g. The present owner of the property, Hancock Bank, has authorized CAC to proceed with performing the recommended NORM survey by preparing and submitting this Work Plan for approval by the Mississippi Department of Environmental Quality.

NORM Survey Procedures: The NORM survey procedures presented below have been discussed with Mr. Bob Goff, Division of Radiological Health, Bureau of Environmental Health, Mississippi State Department of Health who has agreed with these procedures. The NORM survey procedures to be followed are:

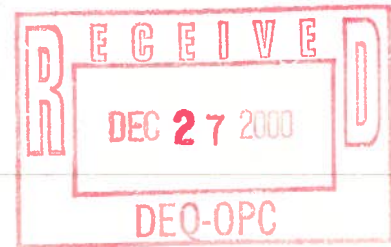
1. If the survey instrument has not been calibrated in the last six (6) months, it will be calibrated prior to performing the survey.
2. All readings will be taken with the instrument no more than 1 meter (3 feet) above the ground.
3. Five (5) background readings will be taken in areas of the site, which were not used for superphosphate fertilizer manufacturing. These areas are in the northern and southern extents of the property. The background readings will be recorded on the NORM Survey Data Sheet. The readings will be averaged to obtain the average background reading for the site.
4. The site will be generally surveyed in order to identify areas where survey instrument readings are more than twice the average background reading. These areas will be marked.

5. Once the areas having readings greater than twice the average background reading have been identified, a more thorough survey of these areas will be performed by establishing grids over the areas. The grid lines will be spaced at 10 meters (33 feet) and will extend beyond the area. A sketch locating the areas and grid lines will be made. Radiation readings will be taken every 10 feet along each grid line. The readings will be recorded on the NORM Survey Data Sheet.
6. Locations along the grid lines having readings above 20 $\mu\text{R/hr}$ will be marked and considered "hot spots". Once all the "hot spots" are located and marked, they will be further surveyed by establishing grid lines spaced at 3 meters (10 feet). Readings will be taken every 10 feet along each grid line and recorded on the NORM Survey Data Sheet. The "hot spots" grid will be shown on the sketch.
7. Once all of the "hot spots" are gridded and surveyed, soil samples will be taken from those "hot spot" grids having readings of 20 $\mu\text{R/hr}$ or higher. The number of "hot spot" grids sampled will represent the percentage of area the "hot spot" grids represent in a total 100 square meter area. For instance, if the "hot spot" grid areas represent 30% of a 100 square meter area, 30% of the samples taken in the 100 square meter area will be taken from the "hot spot" grids.
8. A minimum of five (5) samples per soil layer will be taken in a 100 square meter area. The first soil layer sampled will be 0–15 cm (0"–6") depth while the second soil layer sampled will be 15–30 cm (6"–12") depth. The soil sample will be collected using a stainless steel trowel, which has been decontaminated between sample locations. The decontamination procedures will include washing the stainless steel trowel with liquinox, rinsing with distilled water and allowing to air dry. The soil sample collected from each soil layer will be placed in a plastic zip lock bag. The bag will be marked with the sample location and the soil layer. CAC personnel will wear latex gloves when collecting soil samples. Gloves will be replaced between each sample location to prevent cross-contaminating the samples.
9. The samples will be shipped to an EPA approved radiochemistry laboratory to determine the quantity of radium-226 or radium-228 contained in the soil, in pCi/g .
10. Upon receipt of analytical data, if any samples are taken, CAC will prepare a report documenting the procedures and data collected and presenting the findings and conclusions from that NORM survey.

Submitted by:
Covington and Associates Corporation
John F. Szabo, P.E.
Principal
(228) 452-4999

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

December 18, 2000



Mr. Tony Russell, Chief
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

ATTN: Ms. Penelope Johnston, Project Officer

FILE COPY

RE: Revised Off-Site/Source Area Soils and Groundwater Sampling Work Plan
Gulfport Fertilizer Plant, 33rd Street, Gulfport, Mississippi

Dear Tony:

We are transmitting herewith our revised Work Plan, *Off-Site/Source Area Soils and Groundwater Sampling*, pursuant to the comments and requirements contained in your letter of November 28, 2000. We have identified the revisions made to the work plan document submitted to your office for review and approval on August 21, 2000. Additional language in existing sections are underlined and any new section or subsection will have the section and subsection number underlined making it easier to review the changes.

If you should have any questions or require any additional information, please do not hesitate to contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely yours.

BUTLER SERVICES OF MISSISSIPPI, INC.

W. D. Bates

William D. Bates, P.E.
Project Manager

WDB:ib

Attachments: Off-Site/Source Area Soils and Groundwater Work Plan, Revised December 18, 2000.

cc: Ms. Joy Phillips, Esq., General Counsel, Hancock Bank w/attachments
Mr. Charles Webb, Executive Vice President, Hancock Bank w/o attachments

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MDEO

No. 216650

Invoice
37469819

Reference

Inv Date
12/04/00

Amount Paid
675.00

Check Date = 12/07/00

Check Total = 675.00

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 216650

HANCOCK BANK \$675dols00cts

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE

AMOUNT

12/07/00

*****675.00

George A. Fehrschel

⑈0216650⑈ ⑆065503681⑆ 01 0129100⑈

FILE COPY





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

November 30, 2000

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469819

9 Staff hours @ \$75.00/Hr. for 10/00	\$675.00
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Total Amount Due	<u>\$675.00</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$675.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy



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

November 28, 2000

Ms. Joy Lambert Phillips
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: Gulfport Fertilizer Site
Off-Site/Source Area Soils and Groundwater Sampling Work Plan
dated August 21, 2000
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document submitted by Butler Services of Mississippi, Incorporated on behalf of Hancock Bank. The MDEQ requires a written response to the following comments/requirements by December 28, 2000:

1. A work plan for conducting a NORM survey of the site must be submitted to MDEQ for review and approval.
2. A revised site health and safety plan, including recommendations from the NORM survey must be submitted to MDEQ for review and approval prior to initiating field activities.
3. A figure showing all proposed boring locations must be submitted to MDEQ for review and approval prior to initiating field activities.
4. MDEQ will allow the use of the proposed conductivity sampling technique in addition to conventional boring location logs for determining the placement of the new groundwater monitoring wells.
5. Replicate samples must be collected at a rate of ten (10) percent for each matrix.

6. Table 1 indicates fourteen (14) source area locations that require further delineation. Review of the previous sampling results indicates that there are eighteen (18) source area locations that require further delineation. Table 1 shall be corrected to include the four (4) additional locations. They are: RC9, T450N, T5, and T4100E.
7. Table 2 lists intermediate sample locations for the purpose of further delineating the site. The MDEQ agrees with this approach. However, the MDEQ is curious about the rational for a few of the sampling locations; for example, fifty feet south of 31N19. The MDEQ is not sure if this location is a typo. If this location is correct, please provide rational for sampling this location and others like it.
8. Tables 1 and 2 list sample location 30N19. The tables shall be corrected to indicate the correct sample location 31N19.

SOIL SAMPLING

9. All on-site borings and the off-site soil borings along the fifty and one hundred foot proposed sampling locations shall be advanced to a laterally extensive low permeability confining layer underlying the surficial water bearing zone (as stated in item 7 of MDEQ's July 7, 2000, letter to Hancock Bank). Samples at these locations shall be collected at a minimum of two-foot intervals to a depth of eight feet below ground surface (8' BGS). Samples may be collected on four-foot intervals from 8' BGS to the laterally extensive low permeability confining layer underlying the surficial water bearing zone.
10. Soil samples collected from locations below and adjacent to samples that previously failed the toxicity characteristic leaching procedure analysis (TCLP) must be analyzed for TCLP and totals

MONITORING WELL INSTALLATION, DEVELOPMENT, & SAMPLING

11. The bentonite pellet seal shall extend a minimum of two (2) feet above the filter pack. The bentonite pellet seal must be allowed to hydrate a minimum of eight hours or the manufacturer's recommended hydration time, whichever is longer.

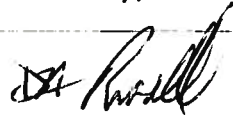
12. The grout shall be pumped by the tremie method into the annular space around the casings up to within two feet of the ground surface.

13. The grout shall be allowed to set for a minimum of twenty-four (24) hours before the surface pad and protective casings are installed.
14. The surface pad shall be a minimum of 3 feet x 3 feet x 6 inches for a 2-inch diameter monitoring well.
15. Each steel pipe protection post shall be installed into an 8- to 10-inch diameter hole to a minimum depth of two (2) feet below ground surface and filled with concrete. The protection posts shall extend above the ground surface a minimum of three (3) feet.
16. A minimum of twenty-four (24) hours must pass between the installation of the surface pad and protective casings and monitoring well development.
17. Monitoring wells must be developed until the column of water in the well is free of visible sediment, and the pH, temperature, turbidity, and specific conductivity have stabilized.
18. A minimum of twenty-four (24) hours must pass between the development of the monitoring wells and sampling of the monitoring wells.
19. Water quality indicator parameters shall be used to determine when purging is complete prior to sample collection in each monitoring well. Purging is considered adequate when the pH, specific conductance, and temperature of the groundwater have stabilized and the turbidity has either stabilized or is below 10 Nephelometric Turbidity Units (NTUs). Stabilization occurs when pH measurements remain constant within 0.1 Standard Unit (SU), specific conductance varies no more than 10 percent, and the temperature is constant for at least three consecutive readings.

Letter to Ms. Joy Lambert Phillips
November 28, 2000
Page 4

If you have any questions or comments, you may contact Penny Johnston at
(601) 961-5388.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Russell", written over a horizontal dashed line.

Tony Russell, Chief
Uncontrolled Sites Section

xc: Denton Bates, Butler Services

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Offsite-Source Area Soils and Groundwater
Sampling Plan Requirement Letter 10-31-00 (pj).doc

MDEQ



No. 215236

Invoice
37469818

Reference

Inv Date
11/06/00

Amount Paid
225.00

Check Date = 11/07/00

Check Total = 225.00

FILE COPY

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 215236

HANCOCK BANK \$225dols00cts

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE

AMOUNT

11/07/00

*****225.00

⑈0215236⑈ ⑆065503681⑆ 01 0129100⑈

George A. Ahlberg





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

November 3, 2000

FILE COPY

Ms. Joy Phillips
Hancock Bank of Gulfport, Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Site
Hancock Bank Letter dated August 7, 2000, summarizing the Gulfport
Fertilizer Site Meeting August 3, 2000
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document and concurs with your summary of the meeting with the exception of the following comments.

1. Item 3 states that there are four offsite locations to the west that will need to be sampled at two and four foot depths for horizontal and vertical delineation. There are five locations to the west that will need to be delineated. They are N20, RC10, S20, S40, and S50. Also, samples shall be collected from depths greater than four feet to ensure that the area is properly delineated.
2. Item 5 states that quarterly sampling for two years will be required at the site regardless of who owns the property. Quarterly sampling will be required for a minimum of two years at the site.
3. The additional site on the western perimeter that will need to be sampled is approximately 100 feet to the west of location 31N29.

Letter to Ms. Joy Phillips
November 3, 2000
Page 2

If you have any questions or comments, you may contact Penny Johnston at
(601) 961-5388.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Russell".

Tony Russell, Chief
Uncontrolled Sites Section

C:\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Meeting Summary Response Letter 9-1-00 (pj).doc



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

October 31, 2000

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469818

3 Staff hours @ \$75.00/Hr. for 09/00	\$225.00
Total Amount Due	<u>\$225.00</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$225.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

HANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594
MDEQ MDEQ

No. 213659

Amount Paid
825.00

Check Total = 825.00

FILE COPY

No. 213659

85-368/655

HANCOCK BANK \$825dols00cts

AMOUNT

*****825.00

**PAY TO THE ORDER OF: MDEQ
P.O. BOX 20325
JACKSON MS 39289**

George A. Schlegel

110213659 1065503681: 01 012910011





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

September 30, 2000

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469817

11 Staff hours @ \$75.00/Hr. for 08/00	\$825.00
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Total Amount Due	<u>\$825.00</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$825.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

No. 211808

MDEQ

MDEQ

Invoice
37469816

Reference

Inv Date
09/06/00

Amount Paid
600.00

Check Date = 09/06/00

Check Total = 600.00

FILE COPY

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 211808

HANCOCK BANK \$600dols00cts

DATE

AMOUNT

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

09/06/00

*****600.00

⑈0211808⑈ ⑆065503681⑆ 01 0129100⑈

George A. Ahlberg





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

August 31, 2000

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469816

8 Staff hours @ \$75.00/Hr. for 07/00	\$600.00
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Total Amount Due	<u>\$600.00</u>
-------------------------	------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$600.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File Copy

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

August 21, 2000

Mr. Tony Russell, Chief
Uncontrolled Sites Section
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

FILE COPY

ATTN: Ms. Penelope Johnston, Project Officer

RE: Off-Site/Source Area Soils and Groundwater Sampling Work Plan
Gulfport Fertilizer Plant, 33rd Street, Gulfport, Mississippi

Dear Tony:

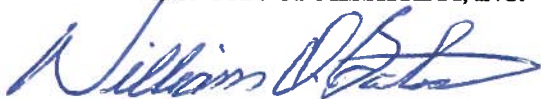
We are transmitting herewith our work plan pursuant to the comments and requirements contained in your letter of July 7, 2000 regarding the Site Characterization Report for the above referenced site.

We had hoped to discuss an approach to the groundwater delineation using other investigative techniques prior to the submission of this work plan. However, it is our understanding that you and Ms. Penny Johnston would not be available until Monday, August 21, the due date of the work plan. Hence, the work plan includes the installation of six (6) additional permanent monitoring wells according to the MDEQ requirements contained in your response letter. However, we would like to have the opportunity to explore other options with you and Penny at a suitable time and if we agree amend or modify the work plan accordingly.

If you should have any questions or require any additional information, please do not hesitate to contact me or in my absence Louis Fortenberry at (228) 769-6983.

Sincerely yours.

BUTLER SERVICES OF MISSISSIPPI, INC.



William D. Bates, P.E.
Project Manager

WDB:ib

Attachments: Off-Site/Source Area Soils and Groundwater Work Plan dated August 21, 2000.

cc: Ms. Joy Phillips, Esq., General Counsel, Hancock Bank w/attachments
Mr. Charles Webb, Executive Vice President, Hancock Bank

**WORK PLAN
OFF-SITE/SOURCE AREA SOILS
AND GROUNDWATER SAMPLING**

**FORMER GULFPORT FERTILIZER PLANT SITE
33RD STREET
GULFPORT, MISSISSIPPI**

**PREPARED
FOR
THE HANCOCK BANK
COMMERCIAL LOAN DEPARTMENT
2510 14TH STREET
GULFPORT, MS 39501**

**PREPARED BY
BUTLER SERVICES OF MISSISSIPPI, INC.
PO Box 1164
PASCAGOULA, MISSISSIPPI 39568-1164
(228) 769-6983**

August 21, 200

TABLE OF CONTENTS

	<u>Page No.</u>
1.0 BACKGROUND	1
1.1 PREVIOUS INVESTIGATIONS	1
1.2 TARGET REMEDIATION GOAL (TRG) CONCENTRATIONS	2
2.0 OBJECTIVES	2
3.0 INVESTIGATIVE ACTIVITIES	4
3.1 SITE RECONNAISSANCE & GRID MARKING	4
3.2 CONDUCTIVITY SURVEY	5
3.3 SOIL SAMPLING AND DELINEATION	7
3.3.1 OFF-SITE SUBSURFACE SOIL DELINEATION	8
3.3.2 SOURCE AREA SUBSURFACE SOIL DELINEATION	9
3.4 MONITORING WELL INSTALLATION	11
3.4.1 GROUNDWATER FLOW DIRECTION	12
3.4.2 GROUNDWATER SAMPLING	12
4.0 HEALTH AND SAFETY	13
5.0 SITE CHARACTERIZATION REPORT	13

TABLES

Table 1 – PROPOSED SAMPLING LOCATIONS AT DEPTH

Table 2 – PROPOSED INTERMEDIATE SAMPLING LOCATIONS

WELL CONSTRUCTION DETAIL

**WORK PLAN
OFF-SITE/SOURCE AREA SOILS
AND GROUNDWATER SAMPLING
FORMER GULFPORT FERTILIZER PLANT
GULFPORT, MISSISSIPPI**

This work plan outlines the activities to further characterize the subject property based on the findings and recommendations contained in the Butler Services of Mississippi, Inc. (Butler Services) Site Characterization Report, dated October 25, 1999. Further, the work plan has been prepared with the intent of addressing the concerns and requirements contained in the Mississippi Department of Environmental Quality (MDEQ) review letter dated July 7, 2000.

1.0 BACKGROUND

The subject property is an approximate 33.06-acre parcel of land located on 33rd Street approximately one block west of its intersection with State Highway 49 in Gulfport, Mississippi. The Gulfport Fertilizer Company, which closed for business in circa 1960, was formerly located on the subject property. The fertilizer company reportedly manufactured superphosphate fertilizer. Improvements to the land once consisted of concrete buildings, surfaced roads and railroad spurs, but the improvements have been largely destroyed.

1.1 Previous Investigations.

A total of 260 soil samples were analyzed to define the horizontal and vertical extent of arsenic and lead in the underlying soils on the 33.06-acre subject property. Of these 112 soil samples were collected during the first sampling event on September 30 and October 1, 1998 and 148 soil samples were collected during the second sampling event on July 19 and July 23, 1999. Iso-concentration maps prepared from both sampling events for the 33.06-acre subject property revealed four identifiable source areas and one isolated area with arsenic and lead contaminants on the northern portion of the property. Two of these source areas are located along the western property boundary. The one isolated area with

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

elevated levels of arsenic and lead contaminants is located near the railroad tracks along the eastern property boundary. The maximum level of contaminants in the apparent source areas ranged from 348 mg/kg to 5982 mg/kg for lead and 113 mg/kg to 702 mg/kg for arsenic.

Work plan references to sample numbers contained herein under investigative activities are as identified in the two previous investigations.

1.2 Target Remediation Goal (TRG) Concentrations.

Random background soil samples were collected as apart of the previous site characterization activities to establish background concentrations of arsenic in the native soils resulting from naturally occurring or anthropogenic sources. This soil data was then used to develop background concentrations based on guidance from USEPA Engineering Forum Issue: "*Determination of Background Concentrations of Inorganics in Soils and Sediments at Hazardous Waste Sites*", December 1995.

The site specific arsenic (As) remediation concentration for surficial soils (defined as soils at a depth of zero to six feet below ground surface (bgs) or zero to groundwater depth, whichever is less) at the site is 7.18 milligrams per kilogram (mg/kg). This agreed to background concentration is based upon MDEQ's calculation using all perimeter sample data from zero to two feet bgs.

The unrestricted TRG concentration for lead (Pb) is 400 mg/kg as set forth in the Mississippi Commission of Environmental Quality's Final Regulations Governing Brownfield Voluntary Cleanup and Redevelopment in Mississippi.

2.0 OBJECTIVES

The objectives of this phase of the work is to (1) delineate the vertical extent of subsurface contamination in the soils in the areas where target remediation goal (TRG)

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

concentrations are exceeded at the four feet below ground surface (bgs) termination depth of the previous investigation; (2) delineate the off-site vertical and horizontal extent of soil contamination encountered along the western property boundary, and (3) evaluate the vertical and horizontal extent of site groundwater contamination, if any.

Discreet soil samples will be collected at depth in the source areas to better define the vertical extent of contamination in the surficial water bearing zone above the low permeability confining layer. In addition to the installation of six groundwater monitoring wells, conductivity probes and temporary monitoring wells will be used to better define the underlying geological units, groundwater flow direction and water-bearing zones.

During the initial Phase I and limited Phase II environmental assessment of the subject property by Covington & Associates, Inc., elevated levels of naturally occurring radioactive material (NORM) was recorded at the site. While the levels recorded are questionable given the location and existing conditions at the site, an independent NORM survey will be conducted prior to Butler Services initiating any further field activities. It is our understanding, General Counsel for Hancock Bank and the Bank's outside counsel, Brunini, Grantham, Grower and Hewes, PLLC have arranged for a professional services firm to conduct this survey in accordance with Mississippi Department of Health regulations and requirements. The work plan for conducting this survey is to be submitted under separate cover and will be incorporated into the appendix to this work plan. Recommendations from the NORM survey and report will be included in the Site Health and Safety Plan.

The Mississippi Department of Environmental Quality (MDEQ) will be notified a minimum of two (2) weeks prior to conducting any field work or sampling event. The MDEQ will be provided the opportunity to observe field work and collect split samples.

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

Butler Services will provide MDEQ with the appropriate sample containers and preservatives should MDEQ request split samples.

3.0 INVESTIGATIVE ACTIVITIES

The investigative activities to further characterize the subsurface soil contamination on the subject property at depth and the vertical and horizontal extent of off-site subsurface contamination along the western property boundary are outlined hereinafter. These work plan investigative activities include the collection of subsurface soil samples to the laterally extensive low permeability confining layer underlying the surficial water bearing zone, advancing conductivity probes and the installation of groundwater monitoring wells. An initial round of groundwater samples will be collected from monitoring wells installed and existing monitoring well MW1 will be re-sampled. Soil and groundwater sampling will be in general accordance with the procedures outlined in USEPA, Region IV's *"Environmental Investigations Standard Operating Procedures and Quality Assurance Manual"* (EISOPQAM).

3.1 Site Reconnaissance & Grid Marking.

Prior to initiating, subsurface drilling activities Mississippi One Call System, Inc. will be contacted to mark the location of any gas, water, and sewer or buried electrical lines at the site. No permit requirements are anticipated for use of the direct-push equipment during the investigation.

Property access and permission to clear underbrush and advance borings will be obtained from adjoining property owners to delineate off-site subsurface contamination. The site will be bush-hogged in the areas to be investigated on-site. Care shall be exercising during the surface clearing operation to retain any remaining flags or grid markings from previous investigations. Traffic cones and caution tape will be used, as necessary, to restrict traffic into work areas.

OFF-SITE/SOURCE AREA SOILS AND GROUNDWATER SAMPLING WORK PLAN

The on-site grid system will be re-established in the source areas that require further vertical soil delineation. Flags with appropriate sample location labeling will be placed at the specific grid points to mark where soil borings and conductivity probes are to be advanced.

In the areas on the western property boundary where contamination above the TRG for arsenic and lead was encountered a 50-foot horizontal grid for sampling will be extended from the western property boundary to the west 300 feet. The grid system described is a westerly extension of the previously established on-site grid system and will extend 200 feet north and 600 feet south along the western property line from sample point RC10. The first set of off-site sampling points will be at the fifty-foot north-south interval line that lies parallel to the property with the exception of two additional points on the property boundary. Subsurface soil samples would continue to be collected at the fifty-foot interval for a distance of 300 feet, field conditions permitting. The two additional points to be sampled on the property boundary are located at the intersection of the extension of the 200 foot north of and 600 foot south of the originally proposed radial conveyor line (RC1 - RC10). These two sample locations are an extension of the previously established on-site grid system and labeled N30 and S70.

Flags will be placed at the specific grid points to mark where off-site soil borings are to be advanced. It may be necessary to offset grid sampling points in the field due to the dense surface vegetation and trees located in the area of investigation.

3.2 Conductivity Survey.

Conductivity probing will be conducted using the model 540U Geoprobe® unit. The unit uses a direct push probing tool to directly measure the soil conductivity as the tool is advanced into the subsurface. The soil conductivity tool is approximately 18 inches in length and has a sensing area of approximately eight inches in length, which contains four rings to provide electrical contact with the soil. The probe basically measures the

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

ease with which an electrical current can be made to flow through the surrounding soils. Barring the influence of strong electrolyte solutions such as natural brines or strong acids and bases, the electrical conductivity of most soil increases with clay content, moisture and temperature.

As the probe is advanced both the soil conductivity and probe penetration rate are continuously recorded and displayed on the real-time computer display. This data is displayed in the form of an onscreen graph and shows depth versus soil conductivity and penetration rate. The graphs can be used to supplement other geologic data once sufficient geologic control is established through verification testing using standard soil boring and logging techniques.

During verification testing at each site, conductivity logs are recorded adjacent to one or more existing soil boring locations that have logs based on conventional drilling and sampling techniques. Typically, the conductivity log exhibits a reasonable similarity to the physical log; however, it is usually clear that the conductivity log detected compositional/textural changes that were not recorded during sample logging or at slightly different depths. This is due to the lost samples, inaccurate sample depths, and individual logging bias that commonly occurs in collecting and describing soil samples.

A total of at least 10 soil conductivity logs will be conducted along two east-west linear transects, one to the north and one to the south of the main area of soil contamination. At each location once the tool has been extracted the borehole will be grouted to the surface using a cement-bentonite grout mix. Each location will be surveyed to determine its location with respect to the grid system established during previous investigations at this site and the ground surface elevation will be determined. All downhole equipment will be decontaminated prior to setting up at the next location.

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

Soil conductivity logs will be used to supplement geologic interpretation between conventional soil boring locations and well locations. Depending on the verification test results at this site, and acceptance by the MDEQ, this technique may also be used as a logging technique for the placement of monitor wells.

3.3 Soil Sampling and Delineation.

Soil borings will be advanced using Geoprobe's Macro-core soil sampler, a 48-inch long by 2-inch diameter soil sampler capable of recovering a sample that measures up to 1300 ml in volume in the form of a 46-inch x 1.5-inch core. This tool is advanced to the desired sampling depth with the retractable opening point sealed. The point is then released, and the sample is allowed to enter as the sampling tube is advanced over a 48-inch depth interval. This procedure is repeated as the boring is advanced in 4 foot increments until the total depth of the boring is reached.

Soil samples will be collected using new clear PVC sample collection liners that are approximately 46-inch long by 1.75-inches in diameter. Once the PVC liner is extracted from the Macro-core sampler, the lithologic description of each core will be recorded on a sample log form. Samples of the soil from the desired depth intervals will be placed into laboratory supplied containers for analysis by Micro-Methods, Inc., located in Ocean Springs, Mississippi.

Soil samples will be collected and will be logged continuously for all soil boring locations. Geologic cross-sections will be prepared from the data generated from the boring logs and to confirm data obtained from the conductivity survey.

After samples have been collected from the soil cores, the remaining soil will be drummed and characterized for disposal in a permitted facility. The boring will then be sealed to the ground surface with cement-bentonite grout.

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

The sampler and sample tubes will be cleaned using tap water and Liquinox. A brush will be used, if necessary, to remove particulate matter and surface films during cleaning. The equipment will then be triple rinsed thoroughly with tap water, analyte free water and pesticide-grade isopropanol, followed by a final rinse of analyte free water only. If analyte free water is not available, the equipment will be allowed to air dry following the solvent rinse. A solvent rinse will not be applied to PVC items or plastic items. Once the equipment has been cleaned it will be removed from the decontamination area and covered with aluminum foil when not in use. Equipment to be stored overnight will be wrapped in aluminum foil and covered with clean, unused plastic. The rinsate will be containerized and transferred to drums for characterization and disposal off-site in a permitted facility.

3.3.1 Off-Site Subsurface Soil Delineation.

The off-site subsurface investigation in the projected area along the western property boundary where contamination above the TRG for arsenic and lead was encountered on the property line will include advancing 56 direct-push probes with the Geoprobe soil sampling equipment. The direct-push probes will be advanced along the grid pattern as described in Section 3.1. Sample collection and equipment decontamination procedures shall be as outlined herein.

Soil samples will be collected at the 2-foot and 4-foot depth interval at all 56 locations on the grid. At the fifty and one hundred foot projected off-site interval sampling point, west of sample location RC10 and S50, the soil probes will be advanced to a depth of eight feet bgs. An additional soil sample will be collected at the eight-foot termination depth at each of these four locations. It is estimated that a total of 116 soil samples will be collected for independent laboratory analysis.

As a part of the field Quality Assurance and Quality Control (QA/QC) program, replicate samples at a rate of 5 percent for each matrix and a daily equipment field blank sample

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

will be prepared similarly for delivery to the laboratory. The samples will be transferred to new laboratory furnished glass sample jars, sealed with a teflon-lined cap and labeled. The samples will then be placed into plastic zip-lock bags and delivered to Micro Methods Laboratory in Ocean Springs, Mississippi in a chilled condition for analyses. A chain-of-custody will be maintained to trace sample custody.

The soil samples will be analyzed by the laboratory for lead (Pb) and arsenic (As) using USEPA Methods SW 846, 7420 and SW 846, 7060A, respectively. The laboratory will be instructed to analyze samples beginning at the fifty-foot grid interval nearest the property line and continuing off-site until the constituent concentrations are below TRG levels. The intent being to analyze only those samples necessary to define the limits of the off-site soil contamination, if any. The remaining samples would be discarded after a reasonable holding period to be established with the laboratory. The laboratory analytical data sheets will state the minimum quantifiable level (MQL) for each constituent and the dilution factor for each sample.

3.3.2 Source Area Subsurface Soil Delineation.

The subsurface investigation to further identify vertical contamination at depth will include advancing 14 direct push probes in the previously identified source hot spots (see Table 1). The extent of arsenic and lead contamination exceeding TRGs at the two-foot and four-foot depth interval has been defined from the previous site characterization data. The 14 soil borings that are the subject of this investigation will be advanced to the laterally extensive low permeability-confining layer underlying the surficial water-bearing zone. In addition, it is proposed that 24 intermediate soil borings (Table 2) be advanced to a depth interval of eight feet in the zone between the hot spots and adjoining sample location where identified constituents concentrations are below TRGs. The purpose of these additional intermediate soil borings within the established on-site 100-foot grid pattern is to further define the horizontal as well as the vertical extent of

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

contamination in the source areas. Sample collection and equipment decontamination procedures shall be as outlined herein.

Soil samples will be collected at four-foot intervals in the 14 soil borings to be advanced to the laterally extensive low permeability-confining layer (minimum thickness 6-inches) underlying the surficial water-bearing zone (estimated not to exceed 20 feet in depth). The intermediate borings will be advanced to eight-foot bgs and samples collected at the 2-foot, 4-foot, 6-foot and 8-foot depth interval. It is estimated that a total of 147 soil samples will be collected for independent laboratory analysis.

As a part of the field Quality Assurance and Quality Control (QA/QC) program, replicate samples at a rate of 5 percent for each matrix and a daily equipment field blank sample will be prepared similarly for delivery to the laboratory. The samples will be transferred to new laboratory furnished glass sample jars, sealed with a teflon-lined cap and labeled. The samples will then be placed into plastic zip-lock bags and delivered to Micro Methods Laboratory in Ocean Springs, Mississippi in a chilled condition for analyses. A chain-of-custody will be maintained to trace sample custody.

The soil samples will be analyzed by the laboratory for lead (Pb) and arsenic (As) using USEPA Methods SW 846, 7420 and SW 846, 7060A, respectively. The laboratory will be instructed to analyze samples beginning at the depth interval nearest the surface and continuing at depth until the constituent concentrations are below TRG levels. To insure that contamination above TRGs does not underlie a low level near surface sample, one additional sample at depth may be analyzed based on field data and previous site characterization delineation to four feet bgs. The intent being to analyze only those samples necessary to define the limits of the vertical soil contamination as well as refine the horizontal extent of soils exceeding TRGs in potential source areas. The remaining samples would be discarded after a reasonable holding period to be established with the

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

laboratory. The laboratory analytical data sheets will state the minimum quantifiable level (MQL) for each constituent and the dilution factor for each sample.

3.4 Monitoring Well Installation.

MDEQ requires that permanent monitoring wells be installed at the site to evaluate groundwater contamination at the site. Further, a minimum of six monitoring wells is required as a result of the concern about the possibility of radial groundwater flow at the site.

Monitoring wells will be constructed of threaded, flush joint, schedule 40 PVC well materials, supplied by the drilling subcontractor and installed using hollow stem auger drilling techniques. To ensure that representative samples of the groundwater are obtained, monitoring wells are to be installed in accordance with monitoring well installation and design specifications for unconsolidated material.

Prior to installing a well, a test boring will be drilled at each of the monitoring well locations. Subsurface soils encountered will be recorded continuously and the approximate depth to groundwater determined to ensure that samples collected from the well borings are at appropriate depth increments.

Upon completion of the test borings, sections of 2-inch PVC, 0.010-inch slotted well screen will be installed through the hollow stem augers. The screened interval will be determined from data developed from boring logs and conductivity survey data. The remainder of the well consists of PVC casing which will be finished approximately 2-feet above with the ground surface. Filter sand will be placed in the annulus between the screen and the borehole to a level of at least 2 feet above the top of the screen. A bentonite pellet seal will be placed on top of the filter sand. The remainder of the annulus will be grouted with a cement bentonite grout acceptable for use in monitoring wells. The surface protection for

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

the will consist of a lockable cap and four steel pipe protection posts anchored in cement. A typical single cased monitoring well construction diagram is included in the Appendix.

Upon completion of construction each monitoring well will be developed by bailing. The wells will be developed to remove fine-grained materials generated during the installation and to ensure that hydraulic continuity is established between the well and the aquifer.

3.4.1 Groundwater Flow Direction.

A licensed land surveyor will survey the wells to a benchmark of known elevation above mean sea level. The depth to groundwater will also be measured in each well using an electric water-level indicator, originating at a specific point on the well casing prior to collecting groundwater samples. This information will be used to determine groundwater flow direction and to construct groundwater contour maps.

3.4.2 Groundwater Sampling.

The six (6) additional monitoring wells and existing monitoring well no. MW-1 will be sampled as a part of this work plan. The wells will be purged and sampled in general accordance with the procedures outlined in USEPA, Region IV's *"Environmental Investigations Standard Operating Procedures and Quality Assurance Manual"* (EISOPQAM). If the groundwater is found to be contaminated the well will be re-sampled. If groundwater contamination is confirmed, a work plan will be prepared for the delineation of the vertical and horizontal extent of contamination. The work plan will be submitted to MDEQ for review and approval prior to initiating any further groundwater assessment activities.

The wells will be purged using a slow purge method. Sampling will be performed after each well has achieved at least 80 per cent (%) recharge; the temperature, pH and conductivity of the groundwater has stabilized as indicated by three consecutive Hydac or equivalent instrument readings within 10 % and the water is free of suspended and

**OFF-SITE/SOURCE AREA SOILS AND
GROUNDWATER SAMPLING WORK PLAN**

settleable matter. A peristaltic pump or new disposable bailer will be used to collect the groundwater sample from each well. The sample from each well will be transferred into new 1 liter, laboratory furnished and nitric acid preserved, plastic sample containers. As a part of the field QA/QC program, a field equipment blank sample will be prepared similarly for delivery to the laboratory. As each sample is collected, it will then be stored in a chilled ice chest for delivery to Micro Methods Laboratory in Ocean Springs, Mississippi for analyses. A chain-of-custody will be maintained to trace sample custody.

The laboratory will analyze the samples for lead (Pb) and arsenic (As) using USEPA Methods 239.2 and 206.2, respectively. The laboratory analytical data sheets will state the minimum quantifiable level (MQL) for each constituent.

4.0 HEALTH AND SAFETY

The field sampling work will be performed under a written Health and Safety Plan (HASP) prepared by Butler Services. A Health and Safety meeting will be held at the site with the Geoprobe subcontractor, drilling subcontractor and Butler personnel prior to initiating any site activities. A Site Safety Officer will be designated to see that the work is performed according to the HASP.

5.0 SITE CHARACTERIZATION REPORT

After completion of site activities and receipt of laboratory data and analyses, Butler Services will prepare a supplemental Site Characterization Report. The report will include a summary of the work that was conducted, the procedures that were used, pertinent findings, conclusions regarding the extent of contamination present at the site, and recommendations for further assessment work, if warranted.

The Site Characterization Report will be submitted to the MDEQ within sixty (60) days after completion of field activities and receipt of laboratory data and analyses.

TABLE 1
PROPOSED SAMPLING LOCATIONS AT DEPTH
OFF-SITE/SOURCE AREA SOILS
AND GROUNDWATER SAMPLING
WORK PLAN
(SOIL SAMPLING ANALYTICAL RESULTS FROM PREVIOUS INVESTIGATION)
FORMER GULFPORT FERTILIZER PLANT
33RD STREET
GULFPORT, MISSISSIPPI

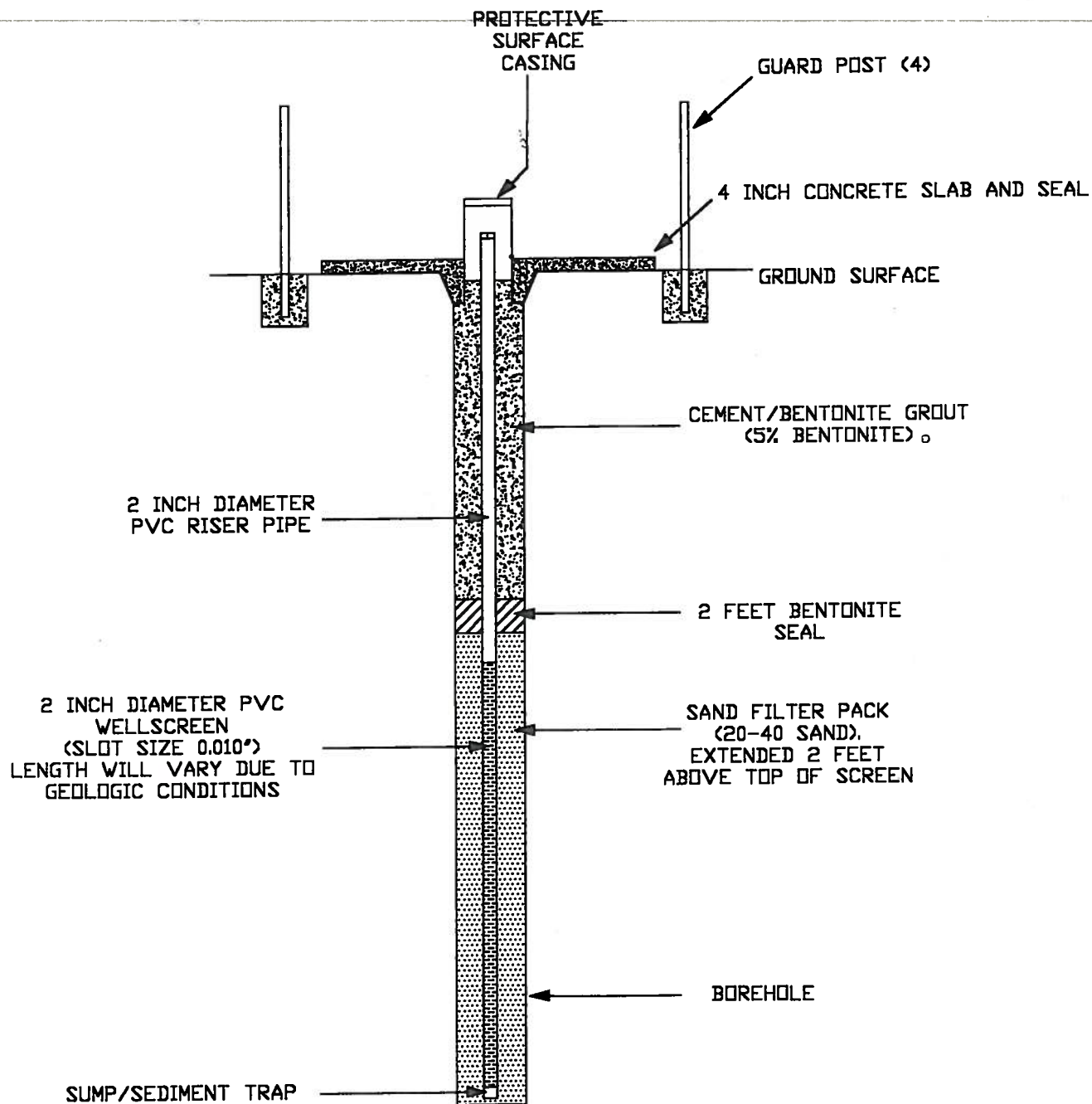
Sample Number	Sample Location	Sample Depth 2ft		Sample Depth 4ft		REMARKS
		Arsenic As (mg/kg)	Lead Pb (mg/kg)	Arsenic As (mg/kg)	Lead Pb (mg/kg)	
31N29	200 ft North of Radial Conveyor Line	1.2	6.5	20.2	16.5	
N18	100 ft North of Radial Conveyor Line	13.2	298	-	-	
30N19	100 ft North of Radial Conveyor Line	9.5	42.3	66.5	14.0	
RC7	Radial Conveyor Line	78.1	5280	34.9	8.74	
RC10	Radial Conveyor Line	127	348	175	22.8	
S16	100 ft South of Radial Conveyor Line	90.4	291	18.4	9.69	
S18	100 ft South of Radial Conveyor Line	6.06	640	29.0	3657	
S40	300 ft South of Radial Conveyor Line	1.27	2.38	3.50	492	
S45	400 ft South of Radial Conveyor Line	4.24	303	23.6	72.2	
S50	400 ft South of Radial Conveyor Line	702	597	113	12.6	
T450E	50 ft East of Test Pit 4	11.7	1076	0.22	780	
T550N	50 ft North of Test Pit 5	359	226	146	703	
31S15	100 ft South of Radial Conveyor Line	42.7	17.0	23.4	3.6	
31S51	500 ft South of Radial Conveyor Line	57.6	70.5	74.5	1241	

Notes:

1. Sample analytical results shown in the Table are from previous investigation to a depth of 4-ft below ground surface.
2. Soil samples will be collected at the location(s) listed in the Table to a laterally extensive low permeability confining layer underlying the surficial water bearing zone encountered at approximately four feet bgs during the previous sampling event.

TABLE 2
PROPOSED INTERMEDIATE SAMPLING LOCATIONS
OFF-SITE/SOURCE AREA SOILS
AND GROUNDWATER SAMPLING
WORK PLAN
FORMER GULFPORT FERTILIZER PLANT
33RD STREET
GULFPORT, MISSISSIPPI

Reference Sample Number	Proposed Sample Location	REMARKS
31N29	50 Ft North	Located between Reference Sample and Grid Sample No. 31N39
30N19	50 Ft South	Located between Reference Sample and Grid Sample No. RC9
	50 Ft East	" " " No. N18
	50 Ft West	" " " No. N20
RC7	50 Ft North	Located between Reference Sample and Grid Sample No. N17
	50 Ft South	" " " No. S17
	50 Ft West	" " " No. RC8
RC10	50 Ft North	Located between Reference Sample and Grid Sample No. N20
	50 Ft South	" " " No. S20
S16	50 Ft South	Located between Reference Sample and Grid Sample No. S26
	50 Ft West	" " " No. S17
S18	50 Ft North	Located between Reference Sample and Grid Sample No. RC8
	50Ft South	" " " No. S28
	50 Ft East	" " " No. S17
	50 Ft West	" " " No. S19
S45	50 Ft North	Located between Reference Sample and Grid Sample No. 31S35
	50 Ft South	" " " No. S55
	50 Ft East	" " " No. S44
	50 Ft West	" " " No. S46
S50	50 Ft North	Located between Reference Sample and Grid Sample No. S40
	50 Ft South	" " " No. S60
	50 Ft East	" " " No. S49
31S15	50 FT South	Located between Reference Sample and Grid Sample No. 31S25
	50 Ft East	" " " No. 31S14



HANCOCK BANK
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85-368/655

No. 210365

HANCOCK BANK \$4,200dols00cts

DATE

AMOUNT

08/08/00

****4,200.00

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P.O. BOX 20325
JACKSON MS 39289

⑈0210365⑈ ⑆065503681⑆ 01 0129100⑈

George A. Abbeget

FILE COPY



LEO W. SEAL, JR.
Chairman and C.E.O.
228-868-4702



Fax 228-868-4627

One Hancock Plaza
Post Office Box 4019
Gulfport, MS 39502

August 8, 2000

Ms. Penny Johnston
Mississippi DEQ
P. O. Box 10385
Jackson, MS 39289-0385



Dear Ms. Johnson:

Thanks for taking time to meet with us last week
on the Old Fertilizer Plant problem.

Hopefully, we are all "reading off the same page"
and Butler Services will now submit a plan that,
upon completion, will enable us to bring this to
a conclusion.

Sincerely Yours,

Leo W. Seal, Jr.

Celebrating A Century Of Service
1899 - 1999

LEO W. SEAL, JR.
Chairman and C.E.O.
228-868-4702



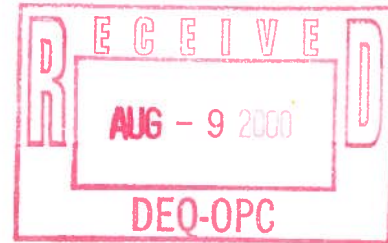
Fax 228-868-4627

One Hancock Plaza
Post Office Box 4019
Gulfport, MS 39502

FILE COPY

August 8, 2000

Mr. Tony Russell, Chief
Uncontrolled Sites Section
Mississippi DEQ
P. O. Box 10385
Jackson, MS 39289-0385



Dear Mr. Russell:

We regret that we needed to take up so much of your, Ms. Johnston and Mr. Riley's time last week, but we want you to know we thank you and appreciated it.

Not having had anything to do with the pollution at the site and having spent over \$225,000.00 in the latter years of the 90's to try and find out just what needs to be done, is exasperating to say the least.

Perhaps now that all parties were able to have a detailed discussion; Butler Services can and will furnish you all with a plan and later the results so that the matter can be "put to rest" once it is determined what "clean up" will be necessary to be performed.

Thanks again for you and your associates time.

Sincerely Yours,

Leo W. Seal, Jr.



Celebrating A Century Of Service
1899 - 1999





JOY LAMBERT PHILLIPS
General Counsel

August 7, 2000

Via Facsimile 601 961-5300 and Regular Mail

Penelope "Penny" Johnston
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

RECEIVED
AUG - 9 2000
Dept. of Environmental Quality
Office of Pollution Control

Re: Gulfport Fertilizer Site Meeting August 3, 2000

FILE COPY

Dear Penny:

This letter is to outline the meeting of August 3, 2000 between yourself, Tony Russell and Kelly Riley of MDEQ, Leo Seal, Charlie Webb and myself of Hancock Bank and Louis Fortenberry and Denton Bates of Butler Services. This meeting was held at the offices of MDEQ at the request of Hancock Bank. The primary purpose of the meeting was to discuss MDEQ's letter to Hancock Bank dated July 7, 2000. Hancock Bank was seeking to understand the requirements and statements of the July 7, 2000 letter and to better understand the specifics that need to be in the work plan that will be submitted by Butler Services. We feel that the meeting was a successful one in accomplishing those purposes. We want to again thank you for your time.

As we discussed, Hancock Bank's ultimate goal is to clean up the property to the requirements of MDEQ, at the least cost and in the most time efficient manner. As we also discussed, Hancock Bank realizes that it will have to decide whether to enter into an industrial agreed order restricting the use of the property, therefore changing the remediation requirements, or clean the property to unrestricted site requirements. Everyone seemed to be in agreement that it was not a decision that needed to be made immediately and that there would be little difference in testing costs whether we go to restricted or unrestricted. Any real savings by entering into the industrial agreed order would be at the clean up phase.

Below I have recapped my understanding of the issues and discussions related to the July 7, 2000 letter. The numbered paragraphs relate to those in the letter.

1. It is my understanding that MDEQ has stated its disagreement with the method of arsenic background concentration calculation submitted by Butler Services. In order to arrive at a valid arsenic background concentration number, MDEQ believes that it is not appropriate to only use the samples from the northern half of the property and has required that the calculation include data from the southern perimeter. Based on MDEQ's calculations, the site specific arsenic remediation concentration is 7.18 milligrams per kilogram (mg/kg). It is our understanding that this is the same background level that will be used as a clean up standard whether the property is designated restricted or unrestricted.
2. It is our understanding that MDEQ has established the unrestricted site target remediation goal for lead to be 400.00 mg/kg and for a restricted site it is 1700.00 mg/kg. There appear to be three locations that would be different depending on restricted/unrestricted. They are the sample locations noted as T450E, N16, and S40. Any soil failing the t clip will have to be removed. There was a discussion by Butler Services about the use of a pug mill which might be used to stabilize the contaminant. It was discussed that through the use of this procedure on the concrete slab it may be possible to stabilize the lead, thereby potentially affecting the categorization of the waste and therefore possibly reducing the cost of removal, i.e., perhaps the ability to move the stabilized soil to Pecan Grove versus transporting it to Emile, Alabama. MDEQ will need to review the details of this proposal.
3. MDEQ clarified that on the Gulfport Fertilizer property there has not been proper vertical delineation and that this will need to be done. MDEQ is also requiring delineation on the western boundary and has indicated that there are four offsite locations to the west that we will need to sample and do two and four foot horizontal and vertical delineation. The details for this plan delineation will need to be in the work plan submitted by Butler Services.
4. The well has been closed and a copy of the closure report was filed and a copy given to MDEQ at our meeting. At the meeting you indicated to Louis Fortenberry that he would need to check the closure for settlement.

5. There was a general discussion of Butler Services' recommendation of conductivity probing. MDEQ agreed that some probing may be appropriate to better establish the well locations, but that MDEQ would have to review the proposal for the probing before it can give its opinion as to whether it feels this is the appropriate methodology. There was some familiarity with conductivity probing but not with its use for this purpose. MDEQ did indicate that while it is hoped that only six wells will be needed, particularly if their location is better identified, MDEQ is unable to commit that additional wells will not be required. Once the wells are installed, if the wells are clean from the beginning, then sampling for only three quarters may be permitted under certain circumstances, otherwise quarterly sampling for two years will be required regardless of who owns the property.
6. It was agreed that once the well locations are established and the wells are installed and monitored that #6 will be addressed as part of that process.
7. Upon reviewing my notes, I am uncertain as to the outcome of this discussion and can only refer to the response set forth in the August 1, 2000 letter from Butler Services to Hancock Bank.
8. As stated in Butler Services' letter to Hancock Bank dated August 1, 2000, the monitoring wells will be installed using a hollow stem auger drilling rig and all well installation and sampling will be conducted in accordance with EISOPQAM.
9. This issue was discussed and while MDEQ acknowledged that it did not regulate NORM, it is a health concern and MDEQ will require it to be addressed before any further work at the site is done. It was discussed that it is possible that the levels represented in the June, 1995 report by Covington contained a typographical error, but nevertheless this issue will need to be addressed by a NORM survey before additional work is done at the site.

You indicated at the end of the meeting that there was an additional site on the western perimeter that will need to be sampled and this point was not designated in the July 7, 2000 report or attachment. It is 31 N 29. In addition there was also a discussion of the fact that EPA is preparing to lower the arsenic level from 50 to 5 for ground water and that we should keep that figure in mind for groundwater so that we do not have to retest once these levels are lowered. You also clarified that

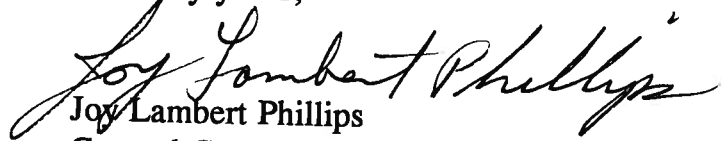
Penny Johnston
August 7, 2000
Page 4

any contamination offsite will have to be cleaned up to unrestricted levels, unless the property owner otherwise agrees.

Also as discussed, we will attempt to see that the work plan submitted to you on or before August 21, 2000 is as complete and detailed as possible, which you indicated would allow a quicker response from MDEQ as to the proposal.

I hope I have accurately summarized what was discussed at the meeting. Please correct or supplement as you deem appropriate. Thank you for your time and assistance in helping us resolve this matter.

Sincerely yours,


Joy Lambert Phillips
General Counsel

/jdr

c Leo W. Seal, Jr.
Charles A. Webb, Jr.
Louis Fortenberry



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

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File
FROM: Penelope Johnston *PS*
DATE: August 3, 2000
SUBJECT: Meeting at MDEQ

On the above date the attached list of people met to discuss MDEQ's July 7, 2000, letter to Hancock Bank. A copy of the July 7, 2000 letter is attached. Below is an outline of the issues discussed. The numbered paragraphs relate to those in the letter.

1. Hancock Bank accepts the MDEQ calculated background arsenic concentration value of 7.18 mg/kg. It was explained that this number will be used as the remediation standard for both the on-site property and any impact to the neighboring property. It was also explained that this remediation standard will be used regardless of whether or not the property is cleaned up to unrestricted or restricted levels.
2. Hancock Bank understands that the unrestricted site remediation standard for lead is 400.00 mg/kg. They also understand that it is possible to raise the restricted site remediation standard to 1700.00 mg/kg if the bank enters into a restricted use agreement for the site. MDEQ explained that based on the sampling data for the site, there appear to be only three (3) locations where going to a restricted remediation standard would be of value. They are N16, S40, and T450E.
3. Hancock Bank understands that they must delineate the horizontal and vertical extent of soil contamination on the western property boundary. The locations requiring delineation are N20, RC10, S20, S40, and S50. Hancock Bank will obtain access to the neighboring property.

4. Hancock Bank stated that monitoring well two (MW-2) has been plugged and abandoned. Butler Services provided MDEQ with a copy of the decommissioning paper work. The paper work is attached to this memo.
5. Butler Services would like to conduct conductivity borings at the site in order to determine the best location for the monitoring wells. MDEQ is unfamiliar with the use of conductivity borings for this purpose and asked for documentation showing its applicability. Butler Services provided the following document for MDEQ review: *A Percussion Probing Tool for the Direct Sensing of Soil Conductivity* by Colin D. Christy, Thomas M. Christy and Volker Wittig.
6. Hancock Bank stated that this requirement would be addressed once the new monitoring wells have been installed. MDEQ explained that Hancock Bank would be required to sample the monitoring wells quarterly for a minimum of two years. MDEQ also explained that any wells that are clean from the beginning may be plugged and abandoned after only three quarters of sampling under certain conditions.
7. Butler Services stated that all borings will be completed to a laterally extensive low permeability confining layer underlying the surficial water bearing zone. They stated that they will provide lithologic logs for all borings and monitoring well locations and geologic cross sections in the follow up report.
8. Butler Services stated that all monitoring well installations, soil sampling, groundwater sampling, and decontamination procedures will be in accordance with the EISOPQAM.
9. Hancock Bank agrees to conduct a NORM survey of the site before any additional field work is conducted.

The following additional topics were discussed during the meeting.

1. MDEQ explained that vertical soil delineation must be conducted on site at any locations above the stated remediation goals.
2. Soils that failed the TCLP must be removed from the site. Confirmation samples must be collected for both totals and TCLP. Butler Services discussed the use of a pug mill to stabilize the contaminants. It was discussed that stabilization procedures may be completed on the concrete

slab located on-site. This may affect the categorization of the waste and may allow the soil to be taken to a Subtitle D landfill rather than a Subtitle C landfill.

3. MDEQ explained that any off-site property must be cleaned up to residential standards unless the owners agree to enter into a restricted use order.
4. MDEQ explained that the arsenic remediation goal for groundwater is expected to be reduced from the current maximum contaminant limit of 50 ug/L to a maximum contaminant limit of 5 ug/L. Hancock Bank may want to take this into consideration during the delineation of the contaminated groundwater.
5. Butler Services provided MDEQ with a copy of a color aerial photograph of the site.

Mississippi Department of Environmental Quality
Meeting Attendees List

Date August 3, 2000

Company or Site Gulfport Fertilizer Site

Location Gulfport Mississippi

Participant	Company	Email Address	Phone Number
Tony Russell	MDEQ	Tony_Russell@deq.state.ms.us	(601) 961-5318
Penny Johnston	MDEQ	Penelope_Johnston@deq.state.ms.us	(601) 961-5388
Kelly Riley	MDEQ	Kelly_Riley@deq.state.ms.us	(601) 961-5369
Joy Phillips	Hancock Bank	Joy-Phillips@hancockbank.com	228- 868-4425 ⁸⁶⁸⁻⁴⁴²⁵
CHARLES A. NEBBIA	HANCOCK BANK		228 8684711
Louis J. Anthony	BUTLER SERVICE	BUTLERMS@AOL.COM	228-769-6983
Joe W. Smith	HANCOCK BANK		228 868 4702
Kelly Riley	MDEQ	kelly-riley@deq.state.ms.us	
DELTON BATES	BUTLER SERVICES		(228) 769-6983

FILE COPY



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Charles H. Chisolm, Executive Director

July 7, 2000

COPY

FILE COPY

Ms. Joy Phillips
Hancock Bank of Gulfport, Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Site
Site Characterization Report dated October 25, 1999
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced documents submitted by Butler Services of Mississippi, Incorporated on behalf of Hancock Bank. The review of these documents has generated the following comments and requirements:

- (1) The MDEQ does not believe that an arsenic background concentration calculated using only perimeter sample locations on the northern half of the property is representative of soil conditions at the site. The MDEQ has calculated a site specific arsenic remediation concentration for the surficial soils at the site using all perimeter sample data from zero to two feet below ground surface (0' to 2' BGS). The sample data for two to four feet below ground surface (2' to 4' BGS) was not included in the calculation because the data for this depth are not normally or log-normally distributed. Surficial soils are defined as soils at a depth of zero to six feet below ground surface or zero to groundwater depth, whichever is less. The site specific arsenic remediation concentration for surficial soils at the site is 7.18 milligram per kilogram (mg/kg). A copy of the calculations is attached.
- (2) The unrestricted site target remediation goal (TRG) concentration for lead is 400.00 mg/kg as set forth in the Mississippi Commission of Environmental Quality's Final Regulations Governing Brownfield Voluntary Cleanup and Redevelopment in Mississippi. These regulations have been adopted for use in the Voluntary Evaluation Program. Until such time as Hancock Bank enters into an Industrial Agreed Order restricting the use of the property to industrial use only,

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289-0385 Phone 601.961.5171 Fax 601.354.6612

the above referenced TRG value is the applicable remediation concentration.

- (3) The MDEQ requires the delineation of the horizontal and vertical extent of the soil contamination on the western property boundary. The delineation shall be based on the established remediation concentrations for the site.
- (4) On-site observations indicate that monitoring well two (MW-2) is damaged approximately 2 feet below the surface. Therefore, MW-2 shall be immediately plugged and abandoned according to the procedures outlined in the USEPA Region IV *Environmental Investigations Standard Operating Procedures and Quality Assurance Manual* (EISOPQAM) dated May 1996, including the 1997 Revisions.
- (5) MDEQ is concerned about the possibility of radial groundwater flow at the site. Based on drainage patterns indicated by the USGS 7.5 minute quadrangle map and on-site observations, multidirectional subsurface flow may exist at the site. Therefore, a minimum of six (6) additional groundwater monitoring wells shall be installed at the site. The ground surface and top of casing elevations of the monitoring wells shall be determined by survey. The attached figure indicates the approximate locations for the monitoring well installations.
- (6) The MDEQ requires that the groundwater flow direction(s) be determined and the horizontal and vertical extent of groundwater contamination be defined.
- (7) The MDEQ requires that all boring locations be advanced to a laterally extensive low permeability confining layer underlying the surficial water bearing zone. Lithologic logs must be recorded continuously for all monitoring well and soil boring locations to serve as documentation that such a geologic unit has been reached. Should the above confining layer not be encountered, borings may be terminated at reasonable depths with regard to the above objectives. Geologic cross-sections shall be prepared from the data generated from the boring logs and submitted in the follow-up report.
- (8) All monitoring well installation, soil and groundwater sampling, and decontamination procedures shall be in accordance with the EISOPQAM, unless otherwise approved by MDEQ.

Ms. Joy Phillips
July 7, 2000
Page 3

- (9) It is MDEQ's understanding, based on conversations with the Mississippi Department of Health, that a Naturally Occurring Radioactive Materials (NORM) survey should be conducted at the site to verify concentrations recorded by Covington and Associates in June 1995.

A work plan addressing these concerns and requirements shall be submitted to MDEQ for approval by August 21, 2000. If you have any questions or comments, you may contact Penny Johnston at (601) 961-5388.

Sincerely,

*Penny Johnston for
Tony Russell*

Tony Russell, Chief
Uncontrolled Sites Section

Xc: Louis Fortenberry Butler Services
Trudy Fisher Brunini, Grantham, Grower, & Hewes
Robert Goff Mississippi State Department of Health

Arsenic Background Sample Locations and Concentrations

Sample ID	0' - 2' Conc.	2' - 4' Conc.
N40	0.11	0.05
N20	12.4	0.39
RC10	127	175
S20	12.6	<0.1
S30	0.74	1.24
S40	1.27	3.5
S50	702	113
S60	0.84	0.42
S80	<0.05	1.02
S910	0.28	<0.05
S1110	<0.05	<0.05
S1210	0.22	0.24
S128	<0.05	NS
S126	0.4	0.24
S124	<0.05	<0.05
S122	<0.05	<0.05
S112	0.1	<0.05
S92	0.39	<0.05
S71	<0.05	NS
31S61	10.4	0.4
31S51	57.6	74.5
31S41	1.9	0.4
31S31	1.9	0.2
31S21	3.8	2.3
31S11	2.4	0.4
30RC1	0.8	0.6
30N11	0.1	2.7
30N21	0.6	1.3
30N31	2	0.1
30N32	6.6	0.3
30N33	0.6	0.5
30N34	0.9	<0.1
30N35	0.6	2.5
31N36	1.5	0.3
31N37	4.5	0.1
31N38	0.5	1.8
31N39	1.6	<0.1

Arsenic Background Concentration Calculation @ 0 - 2 foot depth interval

n	Sample ID	$\sigma^2 - Z^2$ Conc.	x_i	$y_i = \ln x_i$	y_{n+1}	$y_i - y_{n+1}$	s_i	$s_i(y_{n+1} - y_i)$
1	S1110	<0.05	0.025	-3.6889	6.5539	-3.6889	0.4040	4.1381
2	S122	<0.05	0.025	-3.6889	4.0535	-3.6889	0.2794	2.3841
3	S124	<0.05	0.025	-3.6889	4.0535	-3.6889	0.2403	1.8605
4	S128	<0.05	0.025	-3.6889	2.5337	-3.6889	0.2116	1.3167
5	S171	<0.05	0.025	-3.6889	2.5177	-3.6889	0.1883	1.1687
6	S80	<0.05	0.025	-3.6889	2.3418	-3.6889	0.1055	0.6305
7	30N11	0.1	0.1	-2.3026	1.8871	-2.3026	0.1505	0.5116
8	S112	0.1	0.1	-2.3026	1.5041	-2.3026	0.1196	0.4237
9	N40	0.11	0.11	-2.2073	1.3350	-2.2073	0.1056	0.2523
10	S1210	0.22	0.22	-1.5141	0.8755	-1.5141	0.0924	0.1817
11	S910	0.28	0.28	-1.2730	0.6831	-1.2730	0.0798	0.1264
12	S92	0.39	0.39	-0.9416	0.8419	-0.9416	0.0677	0.1055
13	S128	0.4	0.4	-0.9163	0.8419	-0.9163	0.0559	0.0650
14	31N38	0.5	0.5	-0.6931	0.4700	-0.6931	0.0444	0.0407
15	30N21	0.6	0.6	-0.5108	0.4055	-0.5108	0.0331	0.0246
16	30N33	0.6	0.6	-0.5108	0.2390	-0.5108	0.0220	0.0089
17	30N35	0.6	0.6	-0.5108	-0.1054	-0.5108	0.0110	0.0014
18	S30	0.74	0.74	-0.3011	-0.1744	-0.3011	0.0000	0.0000
19	30RC1	0.8	0.8	-0.2231	-0.2231	-0.2231	0.0000	0.0000
20	S60	0.84	0.84	-0.1744	-0.3011	-0.1744	0.0000	0.0000
21	30N34	0.9	0.9	-0.1054	-0.5108	-0.1054	0.0000	0.0000
22	S40	1.27	1.27	0.2390	-0.5108	0.2390	0.0000	0.0000
23	31N36	1.5	1.5	0.4055	-0.5108	0.4055	0.0000	0.0000
24	31N39	1.6	1.6	0.4700	-0.6931	0.4700	0.0000	0.0000
25	31S31	1.9	1.9	0.8419	-0.8419	0.8419	0.0000	0.0000
26	31S41	1.9	1.9	0.8419	-0.8419	0.8419	0.0000	0.0000
27	30N31	2	2	0.6931	-1.2730	0.6931	0.0000	0.0000
28	31S11	2.4	2.4	0.8755	-1.5141	0.8755	0.0000	0.0000
29	31S21	3.8	3.8	1.3350	-2.2073	1.3350	0.0000	0.0000
30	31N37	4.5	4.5	1.5041	-2.3026	1.5041	0.0000	0.0000
31	30N32	6.6	6.6	1.8871	-2.3026	1.8871	0.0000	0.0000
32	31S61	10.4	10.4	2.3418	-3.6889	2.3418	0.0000	0.0000
33	N20	12.4	12.4	2.5177	-3.6889	2.5177	0.0000	0.0000
34	S20	12.6	12.6	2.5337	-3.6889	2.5337	0.0000	0.0000
35	31S51	57.6	57.6	4.0535	-3.6889	4.0535	0.0000	0.0000
36	RC10	127	127	4.8442	-3.6889	4.8442	0.0000	0.0000
37	S50	702	702	6.5539	-3.6889	6.5539	0.0000	0.0000
								sum = 14.2556

n = 37
d = 214.7225059
W = 0.946445266
W _{max} = 0.936

ybar = -0.1374
st. dev. = 2.442235
sumsq = 215.4207
sum = -5.0825

H₀: The data has a lognormal distribution

versus

H_a: The data does not have a lognormal distribution

The calculated W is greater than the W statistic. Hence, we cannot reject H₀, and we conclude that, based on the n = 37 data, the lognormal distribution may be a reasonable approximation to the true unknown distribution.

Site Specific Remediation Goal = Average + 3*Standard Deviation

Site Specific Remediation Goal = ybar + 3(st. dev.)

Site Specific Remediation Goal = -0.1374 + 3(2.442235)

Site Specific Remediation Goal = 7.18 mg/kg

Arsenic Background Concentration Calculation @ 2 - 4 foot depth Interval

n	Sample ID	2' - 4' Conc.	x_i	$y_i = \ln x_i$	y_{n+1}	$y_i - y_{n+1}$	a_i	$a_i(y_{n+1} - y_i)$
1	S1110	<0.05	0.025	-3.6889	5.1648	-3.6889	8.8537	3.6285
2	S112	<0.05	0.025	-3.6889	4.7274	-3.6889	8.4163	2.3852
3	S122	<0.05	0.025	-3.6889	4.3108	-3.6889	7.9997	1.9415
4	S124	<0.05	0.025	-3.6889	1.2528	-3.6889	4.9417	1.0511
5	S910	<0.05	0.025	-3.6889	0.9933	-3.6889	4.8822	0.8817
6	S92	<0.05	0.025	-3.6889	0.9163	-3.6889	4.6052	0.7704
7	30N34	<0.1	0.05	-2.9957	0.8329	-2.9957	3.8286	0.5693
8	31N39	<0.1	0.05	-2.9957	0.5878	-2.9957	3.5835	0.4719
9	S20	<0.1	0.05	-2.9957	0.2824	-2.9957	3.2581	0.3779
10	N40	0.05	0.05	-2.9957	0.2151	-2.9957	3.2108	0.3253
11	30N31	0.1	0.1	-2.3026	0.0198	-2.3026	2.3224	0.2027
12	31N37	0.1	0.1	-2.3026	-0.5108	-2.3026	1.7918	0.1324
13	31S31	0.2	0.2	-1.6094	-0.6931	-1.6094	0.9163	0.0559
14	S1210	0.24	0.24	-1.4271	-0.8675	-1.4271	0.5596	0.0271
15	S126	0.24	0.24	-1.4271	-0.9163	-1.4271	0.5108	0.0184
16	30N32	0.3	0.3	-1.2040	-0.9163	-1.2040	0.2877	0.0069
17	31N36	0.3	0.3	-1.2040	-0.9163	-1.2040	0.2877	0.0034
18	N20	0.39	0.39	-0.9416	-0.9416	-0.9416	0.0000	0.0000
19	31S11	0.4	0.4	-0.9163	-1.2040	-0.9163	-0.2877	
20	31S41	0.4	0.4	-0.9163	-1.2040	-0.9163	-0.2877	sum = 12.8477
21	31S61	0.4	0.4	-0.9163	-1.4271	-0.9163	-0.5108	
22	S60	0.42	0.42	-0.8675	-1.4271	-0.8675	-0.5596	
23	30N33	0.5	0.5	-0.6931	-1.6094	-0.6931	-0.9163	
24	30RC1	0.8	0.6	-0.5108	-2.3026	-0.5108	-1.7918	
25	S80	1.02	1.02	0.0198	-2.3026	0.0198	-2.3224	
26	S30	1.24	1.24	0.2151	-2.9957	0.2151	-3.2108	
27	30N21	1.3	1.3	0.2624	-2.9957	0.2624	-3.2581	
28	31N38	1.8	1.8	0.5878	-2.9957	0.5878	-3.5835	
29	31S21	2.3	2.3	0.8329	-2.9957	0.8329	-3.8286	
30	30N35	2.5	2.5	0.9163	-3.6889	0.9163	-4.6052	
31	30N11	2.7	2.7	0.9833	-3.6889	0.9833	-4.8822	
32	S40	3.5	3.5	1.2528	-3.6889	1.2528	-4.9417	
33	31S51	74.5	74.5	4.3108	-3.6889	4.3108	-7.9997	
34	S50	113	113	4.7274	-3.6889	4.7274	-8.4163	
35	RC10	175	175	5.1648	-3.6889	5.1648	-8.8537	
36	S128	NS						
37	S71	NS						

Ybar = -0.9163
st. dev. = 2.33025
sumsq = 214.7676
sum = -32.0715

n = 35
d = 185.3795622
W = 0.890410693
$W_{(0.05,35)} = 0.934$

H_0 : The data has a lognormal distribution

versus

H_a : The data does not have a lognormal distribution

The calculated W is less than the W statistic. Hence, based on the n = 35 data, non-lognormality has been detected at a 5.0% significance level.

Arsenic Background Concentration Calculation @ 2 - 4 foot depth Interval

n	Sample ID	2' - 4' Conc.	x_i	x_{n+1}	x_i	$x_{n+1} - x_i$	a_i	$a_i(x_{n+1} - x_i)$
1	S1110	<0.05	0.025	2.7	0.025	2.6750	0.4220	1.1289
2	S112	<0.05	0.025	2.5	0.025	2.4750	0.2821	0.7229
3	S122	<0.05	0.025	2.3	0.025	2.2750	0.2475	0.5831
4	S124	<0.05	0.025	1.8	0.025	1.7750	0.2145	0.3807
5	S810	<0.05	0.025	1.3	0.025	1.2750	0.1874	0.2389
6	S82	<0.05	0.025	1.24	0.025	1.2150	0.1841	0.1894
7	30N34	<0.1	0.05	1.02	0.05	0.9700	0.1433	0.1390
8	31N39	<0.1	0.05	0.8	0.05	0.5500	0.1243	0.0884
9	S20	<0.1	0.05	0.5	0.05	0.4500	0.1068	0.0480
10	N40	0.05	0.05	0.42	0.05	0.3700	0.0899	0.0333
11	30N31	0.1	0.1	0.4	0.1	0.3000	0.0739	0.0222
12	31N37	0.1	0.1	0.4	0.1	0.3000	0.0585	0.0176
13	31S31	0.2	0.2	0.4	0.2	0.2000	0.0435	0.0087
14	S1210	0.24	0.24	0.39	0.24	0.1500	0.0289	0.0043
15	S128	0.24	0.24	0.3	0.24	0.0800	0.0144	0.0009
16	30N32	0.3	0.3	0.3	0.3	0.0000	0.0000	0.0000
17	31N36	0.3	0.3	0.24	0.3	-0.0600		
18	N20	0.39	0.39	0.24	0.39	-0.1500		
19	31S11	0.4	0.4	0.2	0.4	-0.2000		
20	31S41	0.4	0.4	0.1	0.4	-0.3000		
21	31S81	0.4	0.4	0.1	0.4	-0.3000		
22	S80	0.42	0.42	0.05	0.42	-0.3700		
23	30N33	0.5	0.5	0.05	0.5	-0.4500		
24	30RC1	0.6	0.6	0.05	0.6	-0.5500		
25	S80	1.02	1.02	1.02	1.02	-0.9700		
26	S30	1.24	1.24	1.24	1.24	-1.2150		
27	30N21	1.3	1.3	1.3	1.3	-1.2750		
28	31N38	1.8	1.8	1.8	1.8	-1.7750		
29	31S21	2.3	2.3	2.3	2.3	-2.2750		
30	30N35	2.5	2.5	2.5	2.5	-2.4750		
31	30N11	2.7	2.7	2.7	2.7	-2.6750		
32	S40	3.5						
33	31S51	74.5						
34	S50	113						
35	RC10	175						
36	S126	NS						
37	S71	NS						
							sum = 3.5781	

$\bar{x} = 0.5742$
st. dev. = 0.772548
sumsq = 28.12545
sum = 17.8000

H₀: The data has a normal distribution
versus
H_a: The data does not have a normal distribution

n = 31
d = 17.90480484
W = 0.714281809
W _(0.05,31) = 0.829

Data shown in bold were determined to be statistical outliers at a 5.0% significance level using Rosner's Test, and therefore were not included in the calculation of W.

The calculated W is less than the W statistic. Hence, based on the n = 31 data, non-normality has been detected at a 5.0% significance level.

Arsenic Background Concentration Calculation @ 0 - 2 foot depth interval

n	Sample ID	0' - 2' Conc.	x_i	x_{n+1}	x_i	$x_{n+1} - x_i$	a_i	$s_i(x_{n+1} - x_i)$
1	S1110	<0.05	0.025	2.4	0.025	2.3750	0.4328	1.0279
2	S122	<0.05	0.025	2	0.025	1.9750	0.2992	0.5909
3	S124	<0.05	0.025	1.9	0.025	1.8750	0.2510	0.4708
4	S128	<0.05	0.025	1.9	0.025	1.8750	0.2151	0.4033
5	S71	<0.05	0.025	1.8	0.025	1.7750	0.1857	0.2925
6	S80	<0.05	0.025	1.5	0.025	1.4750	0.1801	0.2361
7	30N11	0.1	0.1	1.27	0.1	1.1700	0.1372	0.1605
8	S112	0.1	0.1	0.9	0.1	0.8000	0.1182	0.0930
9	N40	0.11	0.11	0.84	0.11	0.7300	0.0965	0.0704
10	S1210	0.22	0.22	0.8	0.22	0.5800	0.0778	0.0451
11	S910	0.28	0.28	0.74	0.28	0.4600	0.0598	0.0275
12	S92	0.39	0.39	0.8	0.39	0.2100	0.0424	0.0089
13	S128	0.4	0.4	0.8	0.4	0.2000	0.0253	0.0051
14	31N38	0.5	0.5	0.6	0.5	0.1000	0.0084	0.0008
15	30N21	0.6	0.6	0.5	0.6	-0.1000		
16	30N33	0.6	0.6	0.4	0.6	-0.2000		
17	30N35	0.8	0.8	0.39	0.8	-0.2100		
18	S30	0.74	0.74	0.28	0.74	-0.4600		
19	30RC1	0.8	0.8	0.22	0.8	-0.5800		
20	S60	0.84	0.84	0.11	0.84	-0.7300		
21	30N34	0.9	0.9	0.1	0.9	-0.8000		
22	S40	1.27	1.27	0.1	1.27	-1.1700		
23	31N36	1.5	1.5	0.025	1.5	-1.4750		
24	31N39	1.8	1.8	0.025	1.8	-1.7750		
25	31S31	1.9	1.9	0.025	1.9	-1.8750		
26	31S41	1.9	1.9	0.025	1.9	-1.8750		
27	30N31	2	2	0.025	2	-1.9750		
28	31S11	2.4	2.4	0.025	2.4	-2.3750		
29	31S21	3.8						
30	31N37	4.5						
31	30N32	6.6						
32	31S61	10.4						
33	N20	12.4						
34	S20	12.6						
35	31S51	57.6						
36	RC10	127						
37	S50	702						

sum = 3.4327

xbar = 0.7107
st. dev. = 0.714082
sumsq = 27.91085
sum = 19.8000

n = 28
d = 13.76763571
W = 0.855902614
$W_{0.05,27} = 0.924$

H₀: The data has a normal distribution
versus
H_a: The data does not have a normal distribution

Data shown in bold were determined to be statistical outliers at a 5.0% significance level using Rosner's Test, and therefore were not included in the calculation of W.

The calculated W is less than the W statistic. Hence, based on the n = 28 data, non-Normality has been detected at a 5.0% significance level.

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Land and Water Resources

Bureau of Land and Water Resources

COUNTY WELL LOCATED Harrison		PERMIT NUMBER		P. O. Box 10631 Jackson, Mississippi 39208 WATER WELL PLUGGING DECOMMISSIONING	
WELL NUMBER	CODED	NAME OF DRILLING FIRM Singley Construction Co.			
DATE WELL PLUGGED 7/21/00		NAME & MAILING ADDRESS OF LANDOWNER Hannack Bank P. O. Box 4019 GULFPORT, MS 39502		NAME OF WELL CONTRACTOR WHO DRILLED THE WELL	
DISTANCE		DIRECTION		NAME OF LANDOWNER WHEN WELL WAS DRILLED	
OTHER LANDMARK		NEAREST TOWN		WELL DATA	
WELL LOCATION		RANGE		Casing Length (Ft.)	
33		75 11 W		2	
TYPE OF CASING		HOLES DRAIN		DRAIN TO STATE WATER BOARD	
PVC		12		DATE WELL COMPLETED	
WELL PURPOSE: Home, Irrigation, Municipal, Industrial, Fish Pond, etc. Monitor					

DESCRIBE HOW THE WELL OR HOLE WAS PLUGGED;
(AMOUNT OF CASING AND/OR SCREEN THAT WAS REMOVED, OR LEFT IN HOLE.
MATERIAL USED IN PLUGGING, ETC.)

Well Casing and screen was removed, Hole was
Overdrilled To 12' Pumped Cement/Bentonite
grout Slurry From Bottom of Hole To ground
Surface (Trimix method)

I CERTIFY THAT THE WELL WAS PLUGGED OR ABANDONED IN ACCORDANCE WITH THE STATE OF MISSISSIPPI REGULATIONS

Darryl B. Boney 8/2/00
SIGNATURE DATE

FILE COPY

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

file copy

August 1, 2000

Mr. Leo Seal, Chairman
Hancock Bank
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

RE: *Site Characterization Report* dated October 25, 1999
Gulfport Fertilizer Plant, Gulfport, Mississippi

Dear Leo:

This letter is in response to the Mississippi Department of Environmental Quality (MDEQ) review comments regarding the Site Characterization Report submitted by our office for the above referenced Hancock Bank site. Our response is general in nature as this is in no way intended as a draft work plan due August 21, 2000 unless otherwise mutually agreed to at our scheduled meeting to be held with MDEQ representatives on Thursday, August 3, 2000.

- (1) The site specific Arsenic remediation concentration of 7.18 mg/kg is very close to the number we submitted earlier. We of course would have liked the number to be higher but believe it to be reasonable and far better than 0.426 mg/kg we started with which would have included the entire +/- 33 acre site.
- (2) The unrestricted site target remediation goal for Lead of 400 mg/kg as stated in the MDEQ letter is as set forth in adopted Brownfield Regulations. If you recall in our initial discussions with MDEQ representatives, a level of 1700 mg/kg was also discussed, as a possible target remediation goal if the Bank accepts industrial deed restrictions.
- (3) We recognize the need to delineate the horizontal and vertical extent at two points on the western property line and plan to address that in our work plan. We have requested Counsel for the Bank to obtain permission for us to go on the adjoining property for the purpose of sampling to eliminate the chance of migration off site.
- (4) We were authorized by the bank to immediately close monitoring well MW-2 and within 36 hours closed it using the procedures in the USEPA EISOPQAM May 1996 including revisions. A closure report will be filed with the state as required by the regulations.
- (5) In addressing MDEQ concern about the possibility of radial groundwater flow, we recommend conductivity probing be conducted at each of the proposed six monitoring well sites to better define the surface geology for the purpose of assessing the need for six additional wells to evaluate groundwater conditions underlying the property. It will enable Butler using real time data developed in the field to recommend the location of the monitoring wells based on actual lithology. Further,

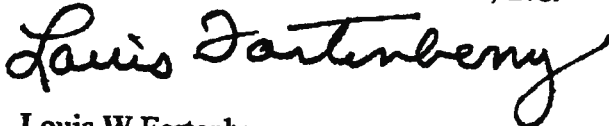
this may reduce the number of well needed and possibly eliminate stepping out with additional wells to bracket the contamination.

- (6) The vertical flow and direction of the groundwater will be determined along with the extent of the vertical and horizontal contamination once the wells are installed, developed and sampled the required number of times to obtain the necessary data to make a call.
- (7) The permeability confining layer and water-bearing zones will be addressed using the conductivity probes and field confirmatory borings, if necessary. They can also be addressed from the lithologic logs kept as the borings are made. The logs will be an attachment to the report prepared on the placement and depth of the wells.
- (8) It is anticipated that the monitoring wells will be installed using a hollow stem auger drilling rig. The well installation, soil and groundwater sampling will be conducted in accordance with the procedures contained in USEPA EISOPQAM.
- (9) The Bank's counsel, Ms. Joy Phillips, has previously indicated that she will address this NORM (Naturally Occurring radioactive Material) issue. However, we will arrange for any additional testing, if required at the site and will assist Ms Phillips as requested.

We are prepared to discuss each of these issues with you prior to our scheduled MDEQ meeting.

Sincerely yours,

BUTLER SERVICES ON MISSISSIPPI, INC.



Louis W Fortenberry
President

cc: Charlie Webb, Executive Vice President, Hancock Bank
Joy Phillips, Esq., Hancock Bank
Trudy Fisher, Esq., Brunini, Grantham, Grower & Hewes

**New Proposed EPA Regulations on Radon in California Man
Drinking Water to Effect Radon Programs in Air Sentence for Illegal
Radon comes from the natu- The new proposed regulation Asbestos Removal at**

num in soil, rock and water. It can be found all over the U.S. Nearly 1 out of every 10 homes in the U.S. is estimated to have elevated radon levels. Breathing radon in the indoor air of homes is the primary public health risk from radon, contributing to about 20,000 lung cancer deaths each year in the United States.

Apart from exposure to radon from the air, the other important exposure pathway is by direct ingestion of radon in water.

Based on a report by the National Academy of Sciences on radon in drinking water, the EPA estimates that radon in drinking water causes about 168 cancer deaths per year, 89 percent from lung cancer caused by radon released from water, and 11 percent from stomach cancer caused by drinking water containing radon.

The USEPA has proposed new regulations to reduce exposure to radon in households by having water systems reduce radon in drinking water supplies. The USEPA Radon Rule relies heavily on the state and/or water system to develop a program to reduce radon exposure through a multimedia mitigation program (MMM). The core of this program will involve encouraging households to test for radon and then mitigate indoor air levels if necessary.



water systems to reduce exposure to radon.

First Option: States can choose to develop enhanced state programs to address the health risks from radon in indoor air, known as MMM programs, while individual water systems reduce radon levels in drinking water to 4,000 pCi/L (picoCuries per liter) or lower. Air mitigation efforts will make up for the higher drinking concentrations.

Second Option: If a state chooses not to develop an MMM program, individual water systems in that state would be required to either reduce radon in their system's drinking water to 300 pCi/L for community water systems serving 10,000 people or more, or develop individual local MMM programs and reduce levels in drinking water to 4000 pCi/L. Water systems already at or below 300 pCi/L standard would not be required to treat their water for radon.

States choosing either a MMM program or direct reduction in water must present their plan to the EPA by February of 2002 and begin implementation by February of 2005. For more information regarding radon in drinking water log on to www.epa.gov/safewater/radon/proposal.html.

A California man was sentenced to one year in prison for knowingly violating the Clean Air Act by illegally removing asbestos-containing material from residential buildings at the Naval Air Weapons Station in China Lake, California. He and other persons working at his direction, violated numerous asbestos removal work practice standards, including failing to adequately wet the asbestos before removing it, failing to carefully lower the asbestos after removal, and failing to ensure that no visible emissions occurred as a result of the removal.



Are People Normally Radioactive ?

Humans are constantly bathed in a sea of nuclear radiation, from many sources. Such radiation is measured in units called millirems (mrem), and typically each human receives about 300-400 mrem per year.

A measurable part of that (30-40 mrem/year) comes from within our own bodies. An essential nutrient called potassium always contains a fraction of radioactive atoms, and these are constantly decaying in our bodies and releasing nuclear particles. As a result, people are among the most radioactive objects in our environment.

The largest source of natural radiation is radon, a radioactive

gas released when elements in rocks decay. Radon may accumulate near the ground, and people whose houses have basements may receive a higher radiation dose as a result. Other natural sources of radiation, include radioactive rocks and cosmic rays.

Radiation: Facts Versus Fears:
<http://www.prioritiesforhealth.com/1102/rad.html>

How much radiation is considered safe? The current legal limits:
<http://web.mit.edu/newsoffice/tt/1994/jan05/33567.htm>

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***A PERCUSSION PROBING TOOL FOR THE
DIRECT SENSING OF SOIL CONDUCTIVITY***

Colin D. Christy, P.E.
Thomas M. Christy, P.E.
Volker Wittig, M.Sc.

Geoprobe Systems
601 N. Broadway
Salina, Kansas 67401

FILE COPY

ABSTRACT

In recent years, percussion soil probing has become widely used for soil gas, soil core, and groundwater sampling. This paper describes a new tool for percussion probing that enables direct sensing of soil conductivity. The probe, which may be a cost effective alternative to borehole resistivity logging, can be readily deployed to detect lithology and contaminants at depths of 60 feet and more without the need for a borehole. Augmenting the versatility of the probe is a PC-based data acquisition system that produces a real-time display of the conductivity log and stores the data for further analysis.

The authors have found the system especially useful for characterizing site lithology. Specifically, the conductivity log reveals sand zones which can be subsequently targeted when setting screens for water sampling. Additionally, it distinguishes with excellent vertical resolution clay layers that may influence plume migration. Furthermore, since the log is displayed in real time and can be interpreted in the field, key information can be immediately substantiated by a discrete soil sample or a water sample using the same probing machinery.

Included in this paper is a description of the probe and its corresponding data acquisition system. The paper also explains field use of the probe and interpretation of the log it produces. Finally, examples of its use are presented to demonstrate how this new tool can be used to enhance site investigations.

INTRODUCTION

The purpose of this paper is to present techniques used and data gathered with soil conductivity probes driven into the ground using percussion soil probing equipment. This probe has been used to depths of up to 70 feet (21.3 m) and yields useful information for distinguishing various lithologic features. This paper presents a description of this soil conductivity probe, its construction, the related data acquisition system, sample soil conductivity logs, and an example of log interpretation.

The use of driven soil conductivity probes has several potential advantages for site investigators. Conductivity logs can be made through small diameter holes using light, mobile probing units. Multiple logs can be run in a single day. The technique does not require the pre-drilling of a bore hole for the logging operation and thus no cuttings are generated in collecting the information.

BACKGROUND

Recent years have seen an increasing role for the use of small diameter soil probing tools in subsurface investigations. These tools are typically 1 inch (2.5 cm) to 1.5 inches (3.8 cm) in diameter, are driven into the ground using percussion hammers, and are primarily used for sampling soil vapor, soil cores, or groundwater.

The increasing usage of these probing tools has been accompanied by improvements in tools and driving mechanisms which has gradually increased the depth of investigation at which probing tools are used. These factors have combined to create an increased demand for tools that will supply information concerning the lithology being penetrated by driven probes. Field operators have a constant demand to be able to distinguish sand zones from finer grained silt or clay zones by some method other than direct sampling.

The measurement of the electrical resistivity (the inverse of conductivity) has long been used as a logging tool in open boreholes both for water well and oil well applications. These resistivity logs can be extremely useful as an aid to the investigator in logging the lithology of the borehole. These logs increase in usefulness when used by investigators experienced in log interpretation, and familiar with the geology of the area of interest. Owing to their long history and variety of application, a wide variety of configurations of borehole logging tools has emerged. These tools vary with their diameter, contact spacing, number of contacts employed, and configuration of the current/voltage array.

Soil conductivity measurements and logs of soil conductivity profiles down to approximately 39 inches (1 m) have been used by agricultural scientists (Rhoades et al., 1976) for the purpose of determining soil salinity. Unlike borehole geophysical logging tools, the probes used in this application have direct contact with the soil.

More recently, soil resistivity measurements with depth have been made using cone penetration testing (CPT) equipment (Robertson et al., 1992). With these systems, relatively small diameter (1.4 inches to 2 inches outside diameter) tools are pushed into the ground using up to 20 tons of static weight at ground surface. Again, these tools employ resistivity measurement techniques

DESCRIPTION OF GEOPROBE SOIL CONDUCTIVITY PROBE

Geoprobe Systems (601 N. Broadway, Salina, Kansas, 67401) has developed a direct push probing tool which directly measures the soil conductivity as the probe is intrusively advanced into the ground. Geoprobe markets several sizes and styles of hydraulic percussion driving equipment which may be used to advance the probe. Soil conductivity information along with the penetration rate are routed to a portable computer from a control box. As this is done in the field, it provides real time measurements of these parameters.

The conductivity probe is constructed of steel and plastic. The sensing area is approximately eight inches in length and in the SC-200 model contains four rings which provide electrical contact with the soil. The distance between the internal two rings is 1 inch and the distance between the outer two rings is 2.5 inches (center to center). The probe has a cone shaped point and is tapered from a diameter of 1 inch at the base of the cone-shaped point to 1.12 inches diameter just above the top electrical contact ring. The hollow internal shaft houses the shielded electrical cable for signal transmission. Photograph 1 shows the SC-400 conductivity probe which uses round sensors in the side of the unit instead of rings. The control box and portable computer are shown in Photograph 2. The probe uses a Wenner configuration in measuring conductivity.

Geoprobe's SC400 Soil Conductivity Probe: The Strong, Sensitive Type.

Soil conductivity logging using percussion driven probes continues to increase in usage for site investigations.

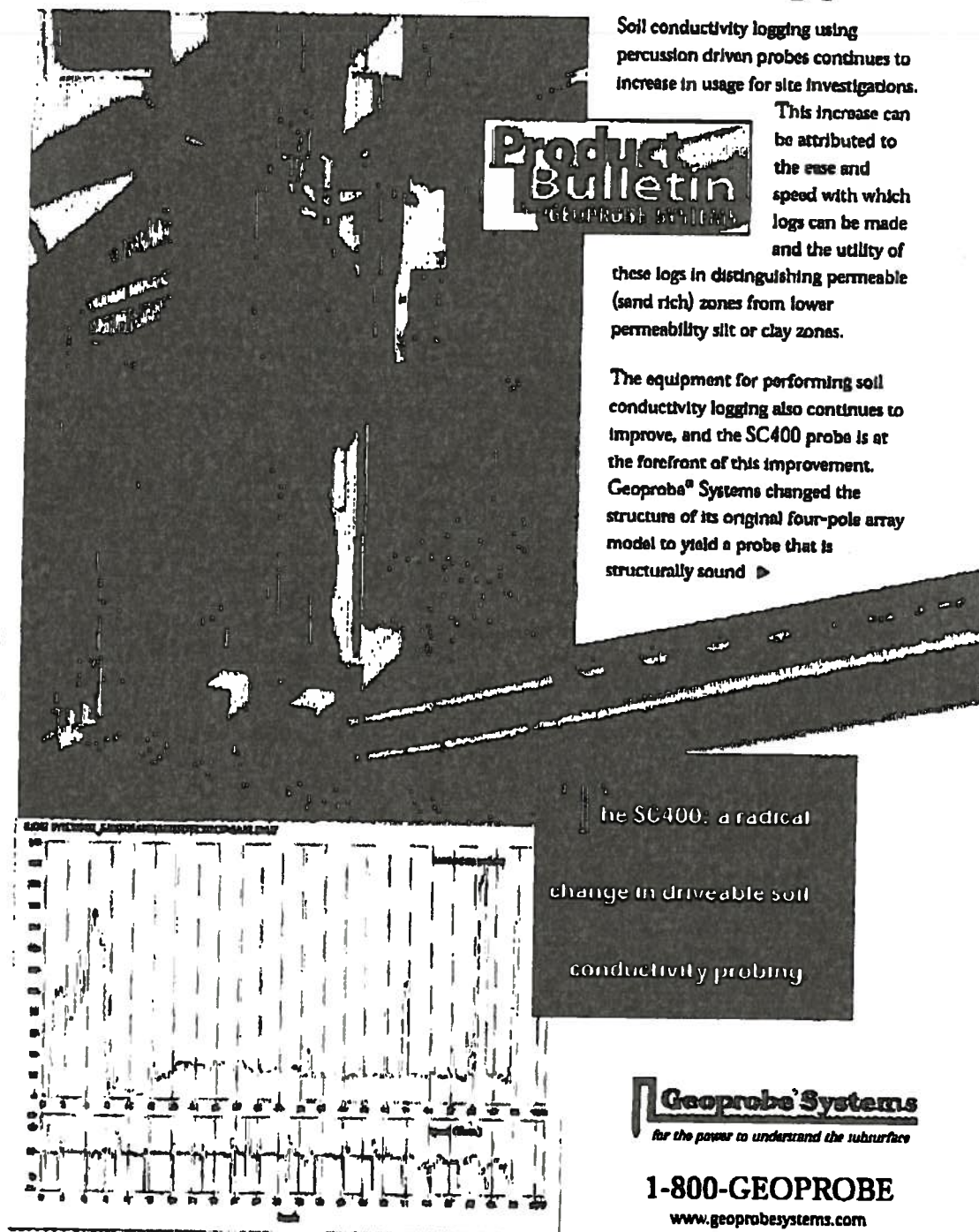
This increase can be attributed to the ease and speed with which logs can be made and the utility of

these logs in distinguishing permeable (sand rich) zones from lower permeability silt or clay zones.

The equipment for performing soil conductivity logging also continues to improve, and the SC400 probe is at the forefront of this improvement. Geoprobe® Systems changed the structure of its original four-pole array model to yield a probe that is structurally sound ▶

Soil Conductivity logs can be run with any Geoprobe® machine, and are gaining wide usage in site investigation. ▶

A typical SC400 log: sand zones have low conductivities while clay and silt zones have higher conductivities. The speed of probe advancement is also shown. ▶



The SC400: a radical change in driveable soil conductivity probing

Geoprobe® Systems
for the power to understand the subsurface

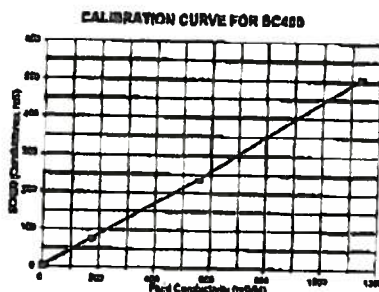
1-800-GEOPROBE
www.geoprobeyesystems.com

and robust, gives excellent sensitivity and linearity, and is less expensive. Retrieving soil conductivity logs is now easier than ever.

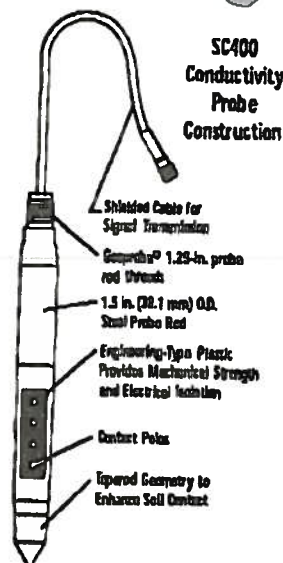
The SC400 is a four-pole "Wenner" array type probe; current is passed through the soil from the outer contacts of this array, voltage is measured on the inner two contacts. The robustness of this new probe is due to its structure: part of the probe's outer shell acts as the support for the insulated array section. You won't bend this probe. The outer surface of the probe is tapered to assure good contact with the soil. And the

four-pole array compensates for any poor contact to measure true soil conductivity. The SC400 is specifically designed for use with Geoprobe® 1.25-inch probe rods,

Additional literature and diskette demos on the use of soil conductivity for subsurface site investigation are available free of charge from Geoprobe® Systems.



Calibration of the SC400 is linear with excellent sensitivity for application in low conductivity soils.



SPECIFICATIONS
 Length 15-in. (381 mm)
 Diameter 1.5-in. (38.1 mm)
 Weight 6.26 lbs. (2.84 Kg)
 Thread System 1.25-in. Geoprobe® Std.
 Array type 4-pole Wenner®
 Vertical resolution 1.75-in. (44.5 mm)
 Measuring Range 0 - >1,000 mS/m
 *The SC400 may also be used for deep cone consumers.

Users of the Geoprobe® Systems Soil Conductivity measurement system who are switching to the SC400 from the SC200 may need to upgrade their SC acquisition software to include the SC400 calibration information. This upgrade is available free of charge from Geoprobe® Systems.

GEOPROBE® SOIL CONDUCTIVITY SYSTEM

Several Geoprobe® conductivity probes, including an expendable model, are available.

Transport your tool string easily. The Rod Cart Carrier mounts to the Geoprobe® unit and folds plug-back into the rear of your carrier vehicle.

The rubber on Geoprobe's Probe Rod Wiper cleans rods as they are retracted from the subsurface.

Conductivity Wenner Probe, for use with 1.25-in. probe rods SC400

Probe Test Jig for SC400 Probe SC463

Stringpot Mounting Bracket SC110

Stringpot Bottom Clamp SC111

Stringpot Piston Weight SC112

Soil Conductivity Instrumentation Case SC150

Direct Image Software SC151

Power Inverter SC152

Extension Cord, 25 ft. SC153

Stringpot SC160

Stringpot Cordset SC161

Probe Cordset Kit SC165

Probe Rod Cart, holds 24 rods with 1.25-in OD SC610

Red Cart Carrier SC675

Slotted Drive Cap for 1.25-in. probe rods AT1202

Slotted Pull Cap for 1.25-in. probe rods AT1203

Probe Rod Wiper for 1.25-in. probe rods and 1.5-in. tools AT1255

For a complete Soil Conductivity Test String, refer to Geoprobe's 1995-96 Test and Equipment Catalog and/or the Geoprobe® Price List.

Product

**Geoprobe®
SC400
Soil Conductivity
Probe**
No. P85B4030P

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 18000 Alameda Ave., Suite 1
 San Jose, CA 95130
 Tel: 408/854-0000 Fax: 408/854-0004

San Antonio Region
 1000 N. Loop West, Suite 100
 San Antonio, TX 78207
 Tel: 214/784-1000 Fax: 214/784-1007

San Diego Region
 19714 Shady Grove Dr., #100
 San Diego, CA 92128
 Tel: 619/594-0000 Fax: 619/594-0004

Wentworth Region
 1400 Appleton Dr.
 Chicago, IL 60641
 Tel: 815/308-0440 Fax: 815/308-0441

Geoprobe® Systems

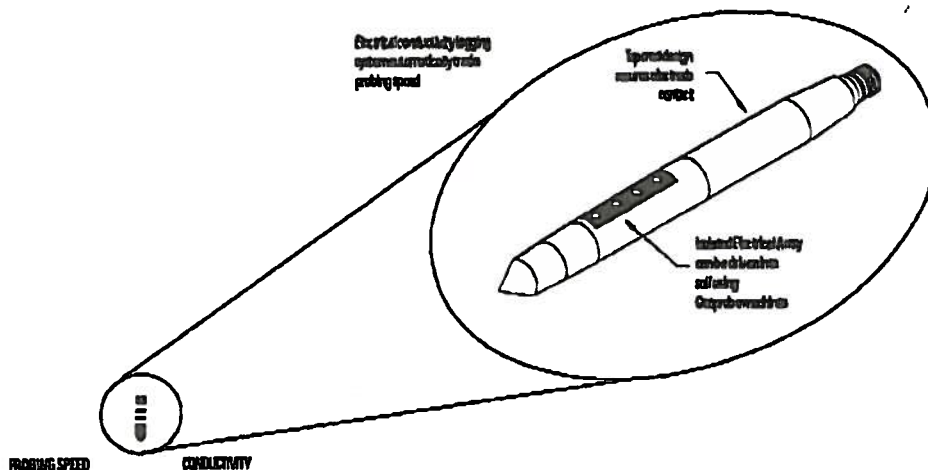
Geoprobe® Systems is a registered
trademark of H&B, Inc.

Geoprobe system
with hydraulic hammer
& logging interval

Direct Image

Conductivity
log then
determine
lithology

Direct conductivity logging
system automatically logs
probing speed



Direct Image Soil Conductivity System

It's the right tool to start off your geologic or environmental site investigation. The Direct Image Soil Conductivity System is an electrical conductivity logging tool that measures soil conductivity for determination of site lithology in unconsolidated materials. The system uses percussion probing to advance a probe into a formation. The probe, developed for high impact, percussion probing using Geoprobe's CH40 hammer, has a tapered design composed of steel contact poles isolated by an engineering plastic.

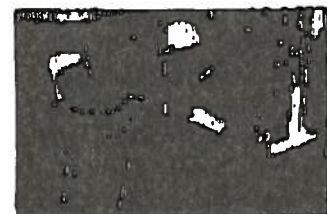
During a push, uphole instrumentation applies an excitation current to the probe and collects data from the probe and a depth measuring stringpot mounted on the probe unit. Direct Image software is run on a laptop computer which mounts inside the instrumentation case. The system provides real-time display of soil conductivity versus depth and probing speed versus depth, and stores the data in a spreadsheet compatible data file for later display and analysis.

To apply the system, an initial Direct Image electrical conductivity log is performed and then compared with a sample log or soil samples collected to confirm and refine interpretation. Discrete, as opposed to

continuous soil sampling, can often be used as confirmation. Subsequent logs on the same site then require little or no confirming samples to determine lithology unless drastic changes in the conductivity profile are observed. The resulting data

are used to pinpoint permeable zones for groundwater or gas sampling, to identify confining clay units and determine their conductivity, and to detect boundaries to flow or zones for aeration.

The conductivity system can be applied to depths of 30+ meters in many unconsolidated formations using the SC400 probe and 1.25-in. probe rods. This system provides a 2 cm resolution. Either a Wenner array or two electrode dipole arrays can be used. The software runs under Windows 3.1 or Windows 95 on a user-supplied IBM compatible 386 or later PC with a math coprocessor.



The Direct Image Soil Conductivity logging system provides real-time log display.

TABLE 1
Soil Sample Analytical Results
(Gasoline Range Organics)

Depth (feet bgs)	Location CND03 (mg/kg)	Location CND04 (mg/kg)
1	< 1.0	< 1.0
3	< 1.0	< 1.0
5	< 1.0	< 1.0
7	< 1.0	< 1.0
9	< 1.0	< 1.0
11	< 1.0	< 1.0
13	< 1.0	< 1.0
15	< 1.0	< 1.0
17	< 1.0	< 1.0
19	< 1.0	< 1.0
21	< 1.0	1.2
23	< 1.0	< 1.0
25	55	70
27	255	104
29	8.1	2.7
31	9.7	2.7
33	8.1	< 1.0
35	< 1.0	2.4
37	7.3	5.6
39	< 1.0	< 1.0

EQUIPMENT AND PROCEDURES

Conductivity Probe and Logging

Soil conductivity logging at the study site was conducted using Geoprobe® Systems Direct Image® Soil Conductivity System. The system was operated in the Wenner array configuration. The electrical conductivity probe itself consists of a steel shaft that runs through the center of four stainless steel contact rings (Figure 3). An engineering grade plastic isolates the contact rings from the steel shaft. The probe is about eight inches long with a one inch diameter at the drive point and 1.125 inch diameter just above the top ring. This geometry provides a one degree taper angle to assure contact with the soil as the probe is advanced into the subsurface. The shielded cable for transmission of the signal is attached to the probe by a watertight rubber seal (KEI, 1994).

The conductivity probe is advanced to depth (logging is conducted) using a hydraulically driven percussion probing machine. Depth and the speed of advancement of the probe is measured with a string pot system. The signals from both the conductivity probe and string pot are carried to the instrumentation box by the cordsets. A notebook PC is connected to the instrumentation box and the Direct Image software provides a real time display of the conductivity signal, probe depth, and speed of advancement as logging is conducted. Figure 2 shows the EC log obtained at location CND02 at the study area. Hard copies of the log can be printed in the field if desired.

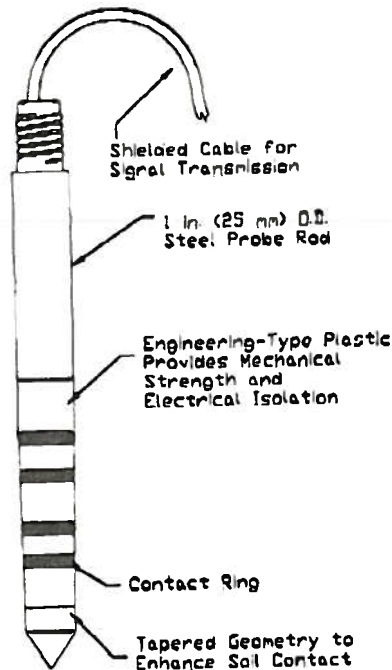


Figure 3
Conductivity Probe Construction

Units of Electrical Conductivity and Factors Influencing the Electrical Conductivity of Unconsolidated Materials

Most geologists are more familiar with electrical resistivity logging than electrical conductivity logging. Units of measurement reported for resistivity logging is the Ohm-meter (Milsom, 1989; Keys, 1989). Since electrical conductivity is the inverse of electrical resistivity, the units of measurement are reported in Siemens/meter. The Siemen is the inverse of the Ohm. Because of the low conductivity of earth materials, the units used for electrical conductivity here are milliSiemens/meter (mS/m). The electrical conductivity of unconsolidated soils and sediments is a function of their grain size. Fine-grained materials such as clays have a higher conductivity than silty materials, which in turn have a higher conductivity than sands or gravels. Most soils and sediments are mixtures of clays, silts and sands and the conductivity of any bulk soil or sediment will be influenced by this fact. Some other major factors influencing the conductivity of unconsolidated materials are the chemical composition, moisture content, and salinity of pore fluids (brines). Because clay minerals are ionically active, they will conduct well even if only slightly moist (Milsom, 1989). Of course, if brine fluids are present, they will greatly increase the conductivity of the formation. Because of these factors, soil and sediment samples at a particular area must be collected to verify what a particular conductivity value represents.



ЛІТЕ СОБА



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

July 31, 2000

FILE COPY

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469815

56 Staff hours @ \$75.00/Hr. for 06/00	\$4,200.00
Total Amount Due	<u>\$4,200.00</u>

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$4,200.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

MDEQ

MDEQ

GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

Invoice
37469814

Reference

Inv Date
07/17/00

No. 20943

Amount Paid
450.00

Check Date = 07/18/00

Check Total = 450.00

HANCOCK BANK

POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019

85-368/655

No. 209436

HANCOCK BANK \$450dols00cts

PAY
TO THE
ORDER
OF:

MDEQ
P.O. BOX 20325
JACKSON MS 39289

DATE
07/18/00

AMOUNT
*****450.00

⑈0209436⑈ ⑆06550368⑆ 01 0129100⑈

George A. Schlegel

UNCONTROLLED SITES PROGRAM

1. () *Deposit Check - Meet Requirements*
2. () *Hold Check - Needs Additional Information*
3. () *Return Check with Letter of Explanation*



Signature

Date

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

July 10, 2000

RECEIVED
JUL 12 2000
Dept. of Environmental Quality
Office of Pollution Control

MS Penny Johnston
MDEQ-Uncontrolled Sites Section
P.O. Box 10385
Jackson, MS 39289-0385

FILE COPY

Dear Penny,

Attached are the two corrected drawings we discussed on the telephone recently. We received your letter of July 7th 2000 and are in the process of pulling together a work plan along with cost information for the bank

Sincerely



Louis Fortenberry



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Charles H. Chisolm, Executive Director

July 7, 2000

FILE COPY

Ms. Joy Phillips
Hancock Bank of Gulfport, Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

RE: Gulfport Fertilizer Site
Site Characterization Report dated October 25, 1999
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced documents submitted by Butler Services of Mississippi, Incorporated on behalf of Hancock Bank. The review of these documents has generated the following comments and requirements:

- (1) The MDEQ does not believe that an arsenic background concentration calculated using only perimeter sample locations on the northern half of the property is representative of soil conditions at the site. The MDEQ has calculated a site specific arsenic remediation concentration for the surficial soils at the site using all perimeter sample data from zero to two feet below ground surface (0' to 2' BGS). The sample data for two to four feet below ground surface (2' to 4' BGS) was not included in the calculation because the data for this depth are not normally or log-normally distributed. Surficial soils are defined as soils at a depth of zero to six feet below ground surface or zero to groundwater depth, whichever is less. The site specific arsenic remediation concentration for surficial soils at the site is 7.18 milligram per kilogram (mg/kg). A copy of the calculations is attached.
- (2) The unrestricted site target remediation goal (TRG) concentration for lead is 400.00 mg/kg as set forth in the Mississippi Commission of Environmental Quality's Final Regulations Governing Brownfield Voluntary Cleanup and Redevelopment in Mississippi. These regulations have been adopted for use in the Voluntary Evaluation Program. Until such time as Hancock Bank enters into an Industrial Agreed Order restricting the use of the property to industrial use only,

OFFICE OF POLLUTION CONTROL

P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612

the above referenced TRG value is the applicable remediation concentration.

- (3) The MDEQ requires the delineation of the horizontal and vertical extent of the soil contamination on the western property boundary. The delineation shall be based on the established remediation concentrations for the site.
- (4) On-site observations indicate that monitoring well two (MW-2) is damaged approximately 2 feet below the surface. Therefore, MW-2 shall be immediately plugged and abandoned according to the procedures outlined in the USEPA Region IV *Environmental Investigations Standard Operating Procedures and Quality Assurance Manual* (EISOPQAM) dated May 1996, including the 1997 Revisions.
- (5) MDEQ is concerned about the possibility of radial groundwater flow at the site. Based on drainage patterns indicated by the USGS 7.5 minute quadrangle map and on-site observations, multidirectional subsurface flow may exist at the site. Therefore, a minimum of six (6) additional groundwater monitoring wells shall be installed at the site. The ground surface and top of casing elevations of the monitoring wells shall be determined by survey. The attached figure indicates the approximate locations for the monitoring well installations.
- (6) The MDEQ requires that the groundwater flow direction(s) be determined and the horizontal and vertical extent of groundwater contamination be defined.
- (7) The MDEQ requires that all boring locations be advanced to a laterally extensive low permeability confining layer underlying the surficial water bearing zone. Lithologic logs must be recorded continuously for all monitoring well and soil boring locations to serve as documentation that such a geologic unit has been reached. Should the above confining layer not be encountered, borings may be terminated at reasonable depths with regard to the above objectives. Geologic cross-sections shall be prepared from the data generated from the boring logs and submitted in the follow-up report.
- (8) All monitoring well installation, soil and groundwater sampling, and decontamination procedures shall be in accordance with the EISOPQAM, unless otherwise approved by MDEQ.

Ms. Joy Phillips
July 7, 2000
Page 3

- (9) It is MDEQ's understanding, based on conversations with the Mississippi Department of Health, that a Naturally Occurring Radioactive Materials (NORM) survey should be conducted at the site to verify concentrations recorded by Covington and Associates in June 1995.

A work plan addressing these concerns and requirements shall be submitted to MDEQ for approval by August 21, 2000. If you have any questions or comments, you may contact Penny Johnston at (601) 961-5388.

Sincerely,

*Penny Johnston for
Tony Russell*

Tony Russell, Chief
Uncontrolled Sites Section

Xc: Louis Fortenberry Butler Services
Trudy Fisher Brunini, Grantham, Grower, & Hewes
Robert Goff Mississippi State Department of Health

Arsenic Background Sample Locations and Concentrations

Sample ID	0' - 2' Conc.	2' - 4' Conc.
N40	0.11	0.05
N20	12.4	0.39
RC10	127	175
S20	12.6	<0.1
S30	0.74	1.24
S40	1.27	3.5
S50	702	113
S60	0.84	0.42
S80	<0.05	1.02
S910	0.28	<0.05
S1110	<0.05	<0.05
S1210	0.22	0.24
S128	<0.05	NS
S126	0.4	0.24
S124	<0.05	<0.05
S122	<0.05	<0.05
S112	0.1	<0.05
S92	0.39	<0.05
S71	<0.05	NS
31S61	10.4	0.4
31S51	57.6	74.5
31S41	1.9	0.4
31S31	1.9	0.2
31S21	3.8	2.3
31S11	2.4	0.4
30RC1	0.8	0.6
30N11	0.1	2.7
30N21	0.6	1.3
30N31	2	0.1
30N32	6.6	0.3
30N33	0.6	0.5
30N34	0.9	<0.1
30N35	0.6	2.5
31N36	1.5	0.3
31N37	4.5	0.1
31N38	0.5	1.8
31N39	1.6	<0.1

Arsenic Background Concentration Calculation @ 0 - 2 foot depth interval

n	Sample ID	0' - 2' Conc.	x_i	$y_i = \ln x_i$	y_{i+1}	$y_{i+1} - y_i$	a_i	$a_i(y_{i+1} - y_i)$
1	S1110	<0.05	0.025	-3.6889	6.5539	10.2428	0.4040	4.1381
2	S122	<0.05	0.025	-3.6889	4.8442	8.5331	0.2794	2.3841
3	S124	<0.05	0.025	-3.6889	4.0535	7.7424	0.2403	1.8605
4	S128	<0.05	0.025	-3.6889	2.5337	-3.6889	0.2116	1.3167
5	S71	<0.05	0.025	-3.6889	2.5177	-3.6889	0.1883	1.1687
6	S80	<0.05	0.025	-3.6889	2.3418	-3.6889	0.1683	1.0150
7	30N11	0.1	0.1	-2.3026	1.8671	-2.3026	0.1505	0.6305
8	S112	0.1	0.1	-2.3026	1.5041	-2.3026	0.1344	0.5116
9	N40	0.11	0.11	-2.2073	1.3350	-2.2073	0.1198	0.4237
10	S1210	0.22	0.22	-1.5141	0.8755	-1.5141	0.1056	0.2523
11	S910	0.28	0.28	-1.2730	0.6931	-1.2730	0.0924	0.1817
12	S92	0.39	0.39	-0.9416	0.6419	-0.9416	0.0798	0.1264
13	S126	0.4	0.4	-0.9163	0.6419	-0.9163	0.0677	0.1055
14	31N38	0.5	0.5	-0.6931	0.4700	-0.6931	0.0559	0.0850
15	30N21	0.6	0.6	-0.5108	0.4055	-0.5108	0.0444	0.0407
16	30N33	0.6	0.6	-0.5108	0.2390	-0.5108	0.0331	0.0248
17	30N35	0.6	0.6	-0.5108	-0.1054	-0.5108	0.0220	0.0089
18	S30	0.74	0.74	-0.3011	-0.1744	-0.3011	0.0110	0.0014
19	30RC1	0.8	0.8	-0.2231	-0.2231	-0.2231	0.0000	0.0000
20	S60	0.84	0.84	-0.1744	-0.3011	-0.1744	-0.1267	-0.1267
21	30N34	0.9	0.9	-0.1054	-0.1054	-0.1054	-0.4054	-0.4054
22	S40	1.27	1.27	0.2390	-0.5108	0.2390	-0.7498	-0.7498
23	31N36	1.5	1.5	0.4055	-0.5108	0.4055	-0.9163	-0.9163
24	31N39	1.6	1.6	0.4700	-0.6931	0.4700	-1.1631	-1.1631
25	31S31	1.9	1.9	0.6419	-0.9163	0.6419	-1.5882	-1.5882
26	31S41	1.9	1.9	0.6419	-0.9416	0.6419	-1.5835	-1.5835
27	30N31	2	2	0.6931	-1.2730	0.6931	-1.9561	-1.9561
28	31S11	2.4	2.4	0.8755	-1.5141	0.8755	-2.3896	-2.3896
29	31S21	3.8	3.8	1.3350	-2.2073	1.3350	-3.5423	-3.5423
30	31N37	4.5	4.5	1.5041	-2.3026	1.5041	-3.8067	-3.8067
31	30N32	6.6	6.6	1.8871	-2.3026	1.8871	-4.1897	-4.1897
32	31S61	10.4	10.4	2.3418	-3.6889	2.3418	-6.0307	-6.0307
33	N20	12.4	12.4	2.5177	-3.6889	2.5177	-6.2066	-6.2066
34	S20	12.6	12.6	2.5337	-3.6889	2.5337	-6.2226	-6.2226
35	31S51	57.6	57.6	4.0535	-3.6889	4.0535	-7.7424	-7.7424
36	RC10	127	127	4.8442	-3.6889	4.8442	-8.5331	-8.5331
37	S50	702	702	6.5539	-3.6889	6.5539	-10.2428	-10.2428

ybar = -0.1374
st dev = 2.44235
sumsq = 215.4207
sum = -5.0825

n = 37
d = 214.7225059
W = 0.946445266
W(0.93,37) = 0.936

H₀: The data has a lognormal distribution

versus

H_a: The data does not have a lognormal distribution

The calculated W is greater than the W statistic. Hence, we cannot reject H₀, and we conclude that, based on the n = 37 data, the lognormal distribution may be a reasonable approximation to the true unknown distribution.

Site Specific Remediation Goal = Average + 3*Standard Deviation

Site Specific Remediation Goal = ybar + 3*(st. dev.)

Site Specific Remediation Goal = -0.1374 + 3(2.44235)

Site Specific Remediation Goal = 7.19 mg/kg

Arsenic Background Concentration Calculation @ 2 - 4 foot depth interval

n	Sample ID	2' - 4' Conc.	x_i	$y_i = \ln x_i$	y_{n+1}	y_i	$y_{n+1} - y_i$	a_i	$a_i(y_{n+1} - y_i)$
1	S1110	<0.05	0.025	-3.6889	5.1648	-3.6889	8.8537	0.4096	3.6265
2	S112	<0.05	0.025	-3.6889	4.7274	-3.6889	8.4163	0.2834	2.3852
3	S122	<0.05	0.025	-3.6889	4.3108	-3.6889	7.9997	0.2427	1.9415
4	S124	<0.05	0.025	-3.6889	1.2528	-3.6889	4.9417	0.2127	1.0511
5	S910	<0.05	0.025	-3.6889	0.9933	-3.6889	4.6822	0.1883	0.8817
6	S92	<0.05	0.025	-3.6889	0.9163	-3.6889	4.6052	0.1673	0.7704
7	30N34	<0.1	0.05	-2.9957	0.8329	-2.9957	3.8286	0.1487	0.5693
8	31N39	<0.1	0.05	-2.9957	0.5878	-2.9957	3.5835	0.1317	0.4719
9	S20	<0.1	0.05	-2.9957	0.2624	-2.9957	3.2581	0.1160	0.3779
10	N40	0.05	0.05	-2.9957	0.2151	-2.9957	3.2108	0.1013	0.3253
11	30N31	0.1	0.1	-2.3026	0.0198	-2.3026	2.3224	0.0873	0.2027
12	31N37	0.1	0.1	-2.3026	-0.5108	-2.3026	1.7918	0.0739	0.1324
13	31S31	0.2	0.2	-1.6094	-0.6931	-1.6094	0.9163	0.0610	0.0559
14	S1210	0.24	0.24	-1.4271	-0.8675	-1.4271	0.5596	0.0484	0.0271
15	S126	0.24	0.24	-1.4271	-0.9163	-1.4271	0.5108	0.0361	0.0184
16	30N32	0.3	0.3	-1.2040	-0.9163	-1.2040	0.2877	0.0239	0.0069
17	31N36	0.3	0.3	-1.2040	-0.9416	-1.2040	0.2877	0.0119	0.0034
18	N20	0.39	0.39	-0.9416	-0.9416	-0.9416	0.0000	0.0000	0.0000
19	31S11	0.4	0.4	-0.9163	-1.2040	-0.9163	-0.2877		
20	31S41	0.4	0.4	-0.9163	-1.2040	-0.9163	-0.2877		
21	31S61	0.4	0.4	-0.9163	-1.4271	-0.9163	-0.5108		
22	S60	0.42	0.42	-0.8675	-1.4271	-0.8675	-0.5596		
23	30N33	0.5	0.5	-0.6931	-1.6094	-0.6931	-0.9163		
24	30RC1	0.6	0.6	-0.5108	-2.3026	-0.5108	-1.7918		
25	S80	1.02	1.02	0.0198	-2.3026	0.0198	-2.3224		
26	S30	1.24	1.24	0.2151	-2.9957	0.2151	-3.2108		
27	30N21	1.3	1.3	0.2624	-2.9957	0.2624	-3.2581		
28	31N38	1.8	1.8	0.5878	-2.9957	0.5878	-3.5835		
29	31S21	2.3	2.3	0.8329	-2.9957	0.8329	-3.8286		
30	30N35	2.5	2.5	0.9163	-3.6889	0.9163	-4.6052		
31	30N11	2.7	2.7	0.9933	-3.6889	0.9933	-4.6822		
32	S40	3.5	3.5	1.2528	-3.6889	1.2528	-4.9417		
33	31S51	74.5	74.5	4.3108	-3.6889	4.3108	-7.9997		
34	S50	113	113	4.7274	-3.6889	4.7274	-8.4163		
35	RC10	175	175	5.1648	-3.6889	5.1648	-8.8537		
36	S128	NS							
37	S71	NS							
									sum = 12.8477

ybar = -0.9163
st. dev. = 2.335025
sumsqr = 214.7676
sum = -32.0715

n = 35
d = 165.3795622
W = 0.890410693
$W_{(0.05,35)} = 0.934$

H_0 : The data has a lognormal distribution

versus

H_a : The data does not have a lognormal distribution

The calculated W is less than the W statistic. . Hence, based on the n = 35 data, non-lognormality has been detected at a 5.0% significance level.

Arsenic Background Concentration Calculation @ 2 - 4 foot depth interval

n	Sample ID	2' - 4' Conc.	x_i	x_{i+1}	x_i	$x_{i+1} - x_i$	a_i	$a_i(x_{n+1} - x_i)$
1	S1110	<0.05	0.025	2.7	0.025	2.6750	0.4220	1.1289
2	S112	<0.05	0.025	2.5	0.025	2.4750	0.2921	0.7229
3	S122	<0.05	0.025	2.3	0.025	2.2750	0.2475	0.5631
4	S124	<0.05	0.025	1.8	0.025	1.7750	0.2145	0.3807
5	S910	<0.05	0.025	1.3	0.025	1.2750	0.1874	0.2389
6	S92	<0.05	0.025	1.24	0.025	1.2150	0.1641	0.1994
7	30N34	<0.1	0.05	1.02	0.05	0.9700	0.1433	0.1390
8	31N39	<0.1	0.05	0.8	0.05	0.5500	0.1243	0.0684
9	S20	<0.1	0.05	0.5	0.05	0.4500	0.1068	0.0480
10	N40	0.05	0.05	0.42	0.05	0.3700	0.0899	0.0333
11	30N31	0.1	0.1	0.4	0.1	0.3000	0.0739	0.0222
12	31N37	0.1	0.1	0.4	0.1	0.3000	0.0585	0.0176
13	31S31	0.2	0.2	0.4	0.2	0.2000	0.0435	0.0087
14	S1210	0.24	0.24	0.39	0.24	0.1500	0.0289	0.0043
15	S126	0.24	0.24	0.3	0.24	0.0600	0.0144	0.0009
16	30N32	0.3	0.3	0.3	0.3	0.0000	0.0000	0.0000
17	31N38	0.3	0.3	0.24	0.3	-0.0600		
18	N20	0.39	0.39	0.24	0.39	-0.1500		
19	31S11	0.4	0.4	0.2	0.4	-0.2000		
20	31S41	0.4	0.4	0.1	0.4	-0.3000		
21	31S81	0.4	0.4	0.1	0.4	-0.3000		
22	S60	0.42	0.42	0.05	0.42	-0.3700		
23	30N33	0.5	0.5	0.05	0.5	-0.4500		
24	30RC1	0.6	0.6	0.05	0.6	-0.5500		
25	S80	1.02	1.02	0.05	1.02	-0.9700		
26	S30	1.24	1.24	0.025	1.24	-1.2150		
27	30N21	1.3	1.3	0.025	1.3	-1.2750		
28	31N38	1.8	1.8	0.025	1.8	-1.7750		
29	31S21	2.3	2.3	0.025	2.3	-2.2750		
30	30N35	2.5	2.5	0.025	2.5	-2.4750		
31	30N11	2.7	2.7	0.025	2.7	-2.6750		
32	S40	3.5						
33	31S51	74.5						
34	S50	113						
35	RC10	175						
36	S128	NS						
37	S71	NS						
							sum = 3.5761	

xbar = 0.5742
st. dev. = 0.772546
sumsq = 28.12545
sum = 17.9000

n = 31
d = 17.90480484
W = 0.714261909
$W_{(0.05,31)} = 0.929$

H_0 : The data has a normal distribution
versus

H_a : The data does not have a normal distribution

Data shown in bold were determined to be statistical outliers at a 5.0% significance level using Rosner's Test, and therefore were not included in the calculation of W.

The calculated W is less than the W statistic. Hence, based on the n = 31 data, non-normality has been detected at a 5.0% significance level.

Arsenic Background Concentration Calculation @ 0 - 2 foot depth Interval

n	Sample ID	0' - 2' Conc.	x_i	x_{i+1}	x_i	$x_{i+1} - x_i$	a_i	$a_i(x_{n+1} - x_i)$
1	S1110	<0.05	0.025	2.4	0.025	2.3750	0.4328	1.0279
2	S122	<0.05	0.025	2	0.025	1.9750	0.2992	0.5909
3	S124	<0.05	0.025	1.9	0.025	1.8750	0.2510	0.4708
4	S128	<0.05	0.025	1.9	0.025	1.8750	0.2151	0.4033
5	S71	<0.05	0.025	1.6	0.025	1.5750	0.1857	0.2925
6	S80	<0.05	0.025	1.5	0.025	1.4750	0.1601	0.2361
7	30N11	0.1	0.1	1.27	0.1	1.1700	0.1372	0.1605
8	S112	0.1	0.1	0.9	0.1	0.8000	0.1162	0.0830
9	N40	0.11	0.11	0.84	0.11	0.7300	0.0865	0.0704
10	S1210	0.22	0.22	0.8	0.22	0.5800	0.0778	0.0451
11	S910	0.28	0.28	0.74	0.28	0.4800	0.0598	0.0275
12	S82	0.39	0.39	0.6	0.39	0.2100	0.0424	0.0089
13	S126	0.4	0.4	0.6	0.4	0.2000	0.0253	0.0051
14	31N38	0.5	0.5	0.8	0.5	0.1000	0.0084	0.0008
15	30N21	0.6	0.6	0.5	0.6	-0.1000		
16	30N33	0.6	0.6	0.4	0.6	-0.2000		
17	30N35	0.6	0.6	0.39	0.6	-0.2100		
18	S30	0.74	0.74	0.28	0.74	-0.4600		
19	30RC1	0.8	0.8	0.22	0.8	-0.5800		
20	S80	0.84	0.84	0.11	0.84	-0.7300		
21	30N34	0.9	0.9	0.1	0.9	-0.8000		
22	S40	1.27	1.27	0.1	1.27	-1.1700		
23	31N38	1.5	1.5	0.025	1.5	-1.4750		
24	31N39	1.6	1.6	0.025	1.6	-1.5750		
25	31S31	1.9	1.9	0.025	1.9	-1.8750		
26	31S41	1.9	1.9	0.025	1.9	-1.8750		
27	30N31	2	2	0.025	2	-1.9750		
28	31S11	2.4	2.4	0.025	2.4	-2.3750		
29	31S21	3.8						
30	31N37	4.5						
31	30N32	6.8						
32	31S61	10.4						
33	N20	12.4						
34	S20	12.6						
35	31S51	57.6						
36	RC10	127						
37	S50	702						
							sum = 3.4327	

xbar = 0.7107
st. dev. = 0.714082
sumsq = 27.91085
sum = 19.9000

H_0 : The data has a normal distribution
versus

H_a : The data does not have a normal distribution

Data shown in bold were determined to be statistical outliers at a 5.0% significance level using Rosner's Test, and therefore were not included in the calculation of W.

The calculated W is less than the W statistic. Hence, based on the n = 28 data, non-Normality has been detected at a 5.0% significance level.

n = 28
d = 13.78763571
W = 0.855802814
$W_{(0.05,28)} = 0.924$



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

June 30, 2000

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

Invoice 37469814

FILE COPY

6 Staff hours @ \$75.00/Hr. for 05/00	\$450.00
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Total Amount Due	<u>\$450.00</u>
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Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$450.00 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

IANCOCK BANK • POST OFFICE BOX 4019 • GULFPORT, MISSISSIPPI 39502-4019 • (228) 868-4594

MDEQ

MDEQ

No. 207864

Invoice
37469813

Reference

Inv Date
06/18/00

Amount Paid
2,212.50

Check Date = 06/20/00

Check Total = 2,212.50

FILE COPY

HANCOCK BANK
POST OFFICE BOX 4019
GULFPORT, MISSISSIPPI 39502-4019



No. 207864

HANCOCK BANK \$2,212dols50cts

DATE

AMOUNT

06/20/00

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F:

MDEQ

P.O. BOX 20325
JACKSON MS 39289

⑈0207864⑈ ⑆06550368⑆ 01 0129100⑈

George A. Schlegel



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

May 31, 2000

Program: Uncontrolled Sites Voluntary Evaluation Program

Site Name: Gulfport Fertilizer, Hancock Bank of Gulfport

FILE COPY

Invoice 37469813

29.5 Staff hours @ \$75.00/Hr. for 04/00	\$2,212.50
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Total Amount Due	<u>\$2,212.50</u>
-------------------------	--------------------------

Should you have any questions, please contact Mona Varner at 961-5572.

Please remit payment in the amount of \$2,212.50 to the Mississippi Department of Environmental Quality at the following address:

MDEQ
P.O. Box 20325
Jackson, MS 39289

cc: Mona Varner, MDEQ/Fees Management
Tony Russell, MDEQ/Hazardous Waste
File copy

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

May 18, 2000



MS Penelope "Penny" Johnston, Project Engineer
Mississippi Department of Environmental Quality
Uncontrolled Sites Division
P.O. Box 10385
Jackson, MS 39289-0385

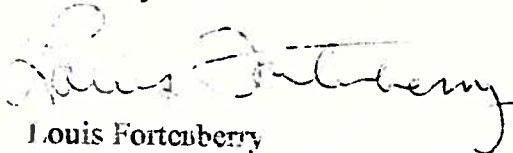
FILE COPY

Dear Penny,

Attached is the additional information you requested by e-mail recently. It took a little longer than expected as we had to request part of the documents from others who had to do the same research we did from files that were already in storage.

My answers are simple and to the point. If further explanation is required, please advise and we will try to provide further elaboration.

Sincerely,



Louis Fortenberry

Butler Services of Mississippi, Inc.
- Environmental Consulting Services -

May 18, 2000

Reply to letter dated April 14, 2000 from Penelope Johnston of Mississippi's DEQ:

Question No. 1 The following field duplicate sample data should be included on all figures. If field duplicate samples other than those listed here were collected their analytical data should also be included on all figures.

31S62-2
S40-2
S40-4
S55-2
S55-4
S75-2
S98-2
S112-2
S124-2

FILE COPY

Reply: All duplicate field data has been added to Figures 2 – 7. Revision notes have been added to noting the addition of this data and corrections were made to several data sets following a thorough review.

Question No. 2 Sample 31S33-2 Duplicate is listed on the chain of custody forms. I am unable to locate any analytical data for this sample. Please provide the analytical results for this sample.

Reply: Sample 31S33-2 and Sample 31S33-2 Dup were collected in the field November 2, 1998 and appear on the chain of custody form supplied to Micro Methods Laboratory with the actual samples collected.

A copy of the original Chain of Custody Record from Micro Methods Laboratory is attached. See notation by laboratory personnel stating that the sample be discarded based on a request by Mr. Louis Fortenberry of Butler Services of MS, Inc.

Question No. 3 The following samples are reported on analytical sheets and chain of custody forms, but the depth of sample collection is not indicated on either. Please provide depth of sample collection.

Reply: These samples were taken at 4 foot depths according to D. Bates & L. Fortenberry who collected the samples.

Post Office Box 1164 • Pascagoula, MS 39568-1164 • (228) 769-6983
800-264-6711 • Fax (228) 769-1219 • E-Mail ButlerMS@AOL.COM

Question No. 4 A copy of the signed Health and Safety Form.

Reply: Please find attached a signed copy of this form.

Question No. 5 A copy of the police report for the stolen drums.

Reply: Please find attached a copy of the original police report verifying theft of 5 drums containing soil cuttings and rinsate.

Questions No. 6 Boring logs for samples collected Sept. 30 – Oct. 1, 1998, Oct. 21, 1998 and Feb. 12, 1999 if available.

Reply: There are no boring logs available for the dates in question. All borings were conducted by Singley Construction of Columbia, MS. No boring logs were recorded.

Question No. 7 Two sets of the corrected figures.

Reply: Attached please find two sets of revised figures to replace existing Figures 2 through 7.

FILE COPY

Analysis Request and Chain of Custody Record

Client/Project Name
GULFPORT FERTILIZER PLANT

Sample submitted by: LA FORTE & BERRY

DEF-0-0PG

FILE COPY

TO: Butler Services

FROM: Micro-Methods, Inc.
Lab File #177-BS-10-98

GULFPORT FERTILIZER COMPANY
10/1/98
SOIL SAMPLES

SAMPLE DESCRIPTION	MM#	ARSENIC mg/kg	LEAD mg/kg
31S25-4	67551	1.3	2.9
31S31-2	67552	1.9	3.0
31S31-4	67553	0.2	3.0
31S32-2	67554	0.5	3.4
31S32-4	67555	0.8	4.8
31S33-2	67556	8.6	55.1
31S33-4	67558	1.4	1.8
31S34-2	67559	0.6	1.6
31S34-4	67560	0.5	3.5
31S35-2	67561	19.0	5.3
31S35-4	67562	1.7	1.2
31S41-2	67563	1.9	3.5
31S41-4	67564	0.4	0.6
31S42-2	67565	2.4	5.8
31S42-4	67566	0.9	1.9
31S43-2	67567	<0.1	4.5
31S43-4	67568	0.9	6.1

METHODOLOGY
SW 846, 6010A - ICP



FILE COPY

MOEQ COPY

WDB/SSO



HEALTH AND SAFETY PLAN

Subsurface Investigation
Gulfport Fertilizer Plant Site
33rd Street, Gulfport, MS

FILE COPY

This Health and Safety Plan outlines the basic safety requirements for the site/assessment work to be performed at the above site. The plan addresses the expected potential hazards that may be encountered on this project. If changes in site or working conditions occur as the activities progress, addenda to this plan will be provided.

The provisions set forth in this plan will apply to all employees and subcontractors of Butler Services of Mississippi that will be working on this project. The subcontractors may request to increase the safety requirements what is described herein with a written request to and approval from the Butler Services Safety Officer.

AUTHORITY FOR SAFETY

The Butler Site Safety Officer (SSO) will be responsible for implementing the requirements of the site safety plan. Mr. Denton Bates will be designated SSO for this project.

The SSO is responsible for addressing the following items:

- Implementing the provisions of the HASP.
- Dissemination of information contained in the plan to all on-site personnel involved in the project through a daily safety meeting.
- Ensure all onsite workers have proof of OSHA 40-Hour Health and Safety Training.
- Review on-site safety supplies and equipment inventory.
- Procedures for reporting accidents or incidents.

The SSO has the authority to suspend work at any time he finds nonconformance to the plan or discovers that the provisions of the plan are inadequate for worker safety.

MEDICAL SURVEILLANCE

Butler personnel and it's subcontractors engaged in project activities must be participants in a medical surveillance program and must be cleared by the examining physician to wear respiratory protection and protective clothing, if necessary, for working with hazardous substances. All applicable State and Federal occupational safety requirements are to be observed.

HAZARD ASSESSMENT

Chemical hazards

The constituents of concern that may be encountered on the site are lead and arsenic in the soil and groundwater. These contaminants are the result of the manufacture of phosphate fertilizer at the site. When the fertilizer plant was in operation the type of phosphate commonly manufactured at that time was normal super-phosphate. Normal super-phosphate is manufactured by introducing sulfuric acid to phosphate rock (tri-calcium-phosphate). Typically, the phosphorous pentoxide, referred to as P2O5, and calcium oxide content of the rock used in production at the time the plant was operating was about 33% and 48%, respectively. The remainder of the

constituents in the phosphate rock consisted of lead and arsenic as well as a low percentage of other compounds such as aluminum, iron, carbon dioxide, fluorine and miscellaneous trace elements.

The typical exposure pathways include inhalation, ingestion and dermal absorption. Ingestion is the primary exposure pathways of concern. Level "D" protection consisting of hard hats, steel toed boots, long trousers, long sleeve shirts and protective gloves will be mandatory on site.

Table 1
Anticipated Contaminants

CONTAMINATE	HIGHEST OBSERVED CONCENTRATION	PEL/TLV ppm or mg/m ³	IDLH ppm or mg/m ³	SYSTEMS/EFFECTS OF ACUTE EXPOSURE
Lead	Soil 11,000 ppm			See MSDS – Attachment A
Arsenic	Soil 325 ppm			See MSDS – Attachment A

Controls and procedures of this plan will be used to keep exposures below the lowest recommended limit.

Physical Hazards

The work area shall be secured and the area restricted during the soil and groundwater

The location of underground utilities shall be marked prior to the initiation of subsurface activities at the site. Mississippi one-call (1-800-227-6477) has been contacted to cause to have the utility companies mark utility locations at the site, Verification No. 99071214410706. Known utilities at the site include a buried underground utility cable along the railroad right-of-way on the eastern boundary of the site.

Whenever possible work should be scheduled during the cooler parts of the day. The following protocols are to be used to counter heat stress:

- Allow workers to replace body fluids, water will be available at the site. Liquids for electrolyte replenishment will be available at the discretion of the SSO.
- Cool vests will be made available. Their use will be designated at the discretion of the SSO, if a lack of shade in the work zones results in their need regardless of the temperature.
- Allow workers to obtain adequate shade from direct exposure to the sun during rest periods in the tree-shaded area on the north end of the property.
- At the discretion of the SSO, workers' vital signs will be monitored (i.e., body temperature, blood pressure and heart rate). If deemed necessary by the SSO, workers will be fitted with heat stress monitors.
- Field personnel are encouraged to maintain their physical fitness.
- Intake of diuretics (coffee or alcohol) should be minimized prior to field work

GENERAL PROJECT SAFETY REQUIREMENTS

Project activities will be conducted in accordance with the minimum safety requirements:

- Eating, drinking and smoking will be restricted to designated areas. All personnel will be required to wash hands and face before eating, drinking or smoking in designated areas.
- Gross decontamination and removal of all personal protective equipment will be performed prior to leaving the site. Contaminated protective clothing will be removed and collected for disposal.
- The SSO will be responsible for taking the necessary steps to protect on-site personnel from physical hazards, including falling objects, falls from elevations, slip and trip hazards, and for providing proper equipment and appropriate safety equipment.
- On-site personnel will be cautioned to observe each other for the effects of the presence of toxic exposure such as headaches, dizziness, nausea, blurred vision, cramps, irritation of the eyes, skin or respiratory tract, changes in skin complexion/color, changes in motor coordination, changes in personality or changes in speech or pattern.

WORK ZONES

All areas within 15 feet of soil boring operations will be designated as Exclusion Zones. Cones or yellow caution tape will be used, if necessary, to deny public access to these areas. Surveillance of the areas will be performed by all on-site personnel to deny public access. Work will stop immediately when unauthorized access to the Exclusion Zones occurs.

PROTECTIVE EQUIPMENT REQUIREMENTS

On-site personnel are required to wear the following clothing and equipment, as a minimum while in the work areas:

- Hard Hat
- Steel Toed Boots
- Long Trousers
- Long Sleeve Shirt
- Protective Gloves

Cool vests and heat stress monitors will be available on-site if the ambient temperature is above 90° F and the SSO determines their use is appropriate. At the discretion of the SSO, a lack of shade may result in the need for cool vests regardless of the temperature.

EMERGENCY RESPONSE PROCEDURES

At a minimum, the following equipment will be present on-site and be readily accessible for use in the event of emergency:

- Emergency eye-wash bottle
- First Aid Kit
- 10 Pound NFPA approved Class ABC Fire Extinguisher

If suspected hazardous waste comes into contact with the eyes, the victim's eyelids must be held open and the eyes rinsed with eyewash solution for a minimum of 15 minutes. The victim must then be taken to a hospital for further treatment.

If suspected hazardous waste comes into contact with the skin, the affected areas must be held open and the skin rinsed with water for a minimum of 15 minutes. If further irritation exists, the victim must be taken to a hospital for further treatment.

If a fire starts, a Fire Department must be called immediately. Attempts to put out a fire should be considered only if there is little risk in doing so. Chemical fires will not be approached under any circumstance. In the case of chemical fires, the site will be vacated immediately.

In the event of an accident resulting in physical injury, first aid will be administered and the injured worker will be transported to the nearest hospital for emergency treatment.

EMERGENCY TELEPHONE NUMBERS

A list of emergency telephone numbers is attached to this site safety plan. Telephone numbers for the utility companies with services in the area are also included in the list of emergency telephone numbers.

EMERGENCY MEDICAL TREATMENT

In the event of injury or illness requiring emergency medical care beyond on-site capabilities, the following resources will be utilized as appropriate:

Local Emergency Hospital: Memorial Hospital at Gulfport
 4500 13th Street
 Emergency (228) 865-3420
 Main (228) 867-4000

Ambulance Service: American Medical Response
 Emergency 911

The hospital is located approximately seven (7) minutes at a distance of 2.9 miles from the site traveling east along 33rd Street to US Highway No. 49, then south on US Highway No. 49 to US Highway No. 90, then west along US Highway No. 90 to Broad Avenue, then north on Broad Avenue to 13th Street. The hospital is located in the first block on the left side of 13th Street. A map is attached to this plan with directions from the site to the hospital.

This site safety plan has been prepared to prescribe minimum procedural and equipment requirements for worker protection in accordance with OSHA guidance for Hazardous Waste Site Activities.

This document was prepared by WD Bates
WD BATES, Site Safety Officer

DATE: 7/16/99

ATTACHMENTS:

EMERGENCY CONTACTS

HOSPITAL ROUTE MAP

- A - MATERIAL SAFETY DATA SHEETS FOR LEAD AND ARSENIC
- B - EQUIPMENT DECONTAMINATION PROCEDURES

EMERGENCY CONTACTS:

National Response Center Hotline	800-424-8802
US EPA Region IV	800-424-8802
CMA Chemical Referral Center	800-262-8200
CHEMTREC	800-424-9300
Mississippi Department of Environmental Quality	601-961-5171
Mississippi Emergency Management Agency	601-352-9100
City of Gulfport Fire Department	911
City of Gulfport Police Department	911
Mississippi State Highway Department	601-833-7811
Mississippi State Health Department	601-894-2271
Poison Control Center	601-684-7361

MEDICAL EMERGENCY:

Local Emergency Hospital: Memorial Hospital at Gulfport
4500 13th Street
Emergency (228) 865-3420
Main (228) 867-4000

Ambulance Service: American Medical Response, Inc.
Emergency 911

UTILITY CONTRACTS:

City of Gulfport Department of Public Works (Water and Sewer)	228-868-5765
Mississippi Power Company	800-487-3275
BellSouth Telephone	800-227-6477



SITE

2800 33rd STREET

33rd STREET

Start from 2800 33rd Street to 4500 13th Street
Approximate travel time is 7 minutes at a distance of 2.9 miles.

Start out going SOUTH on US-49 towards 25TH STREET.
Turn RIGHT onto US-90 West.

Highway 49

HOSPITAL

4500 13th Street



13TH Street

Broad Avenue

Highway 90

TR METALS -- LEAD
MATERIAL SAFETY DATA SHEET
NSN: 681000N084293
Manufacturer's CAGE: 04MC9
Part No. Indicator: A
Part Number/Trade Name: LEAD

=====

General Information

=====

Company's Name: TR METALS
Company's Street: 1 PAVILION AVE
Company's City: RIVERSIDE
Company's State: NJ
Company's Country: US
Company's Zip Code: 08075
Company's Emerg Ph #: 800-424-9300 (CHEMTREC)
Company's Info Ph #: 609-461-9000
Record No. For Safety Entry: 001
Tot Safety Entries This Stk#: 001
Status: SMJ
Date MSDS Prepared: 01JAN93
Safety Data Review Date: 25MAR98
MSDS Serial Number: CGSQQ

=====

Ingredients/Identity Information

=====

Proprietary: NO
Ingredient: LEAD (SARA 313) (CERCLA)
Ingredient Sequence Number: 01
Percent: 99.99
NIOSH (RTECS) Number: OF7525000
CAS Number: 7439-92-1
OSHA PEL: N/K (FP N)
ACGIH TLV: 0.15 MG/M3 DUST

Proprietary: NO
Ingredient: SUPDAT: NERVOUS SYS DAMAGE RESULTING IN SEVERE HDCHS,
CONVULSIONS, COMA, DELIRIUM & DEATH. ALCOHOL & PHYSICAL (ING 3)
Ingredient Sequence Number: 02
NIOSH (RTECS) Number: 9999999ZZ
OSHA PEL: NOT APPLICABLE
ACGIH TLV: NOT APPLICABLE

Proprietary: NO
Ingredient: ING 2: EXERTION CAN BRING ON SYMPTOMS. OTHER EFFECTS OF LONG
TERM EXPOSURE CAN RESULT IN DECREASED FERTILITY, (ING 4)
Ingredient Sequence Number: 03
NIOSH (RTECS) Number: 9999999ZZ
OSHA PEL: NOT APPLICABLE
ACGIH TLV: NOT APPLICABLE

Proprietary: NO
Ingredient: ING 3: MISCARRIAGE & BIRTH DEFECTS.
Ingredient Sequence Number: 04
NIOSH (RTECS) Number: 9999999ZZ
OSHA PEL: NOT APPLICABLE
ACGIH TLV: NOT APPLICABLE

Proprietary: NO
Ingredient: HYGIENE PRACTS: HYGIENE IE, WASH HANDS & FACE BEFORE EATING,
DRINKING, PUTTING ON MAKE-UP OR SMOKING. SHOWERING (ING 6)
Ingredient Sequence Number: 05

<http://msds.pdc.cornell.edu/msds/siri/q294/q176.html>

7/15/99

NIOSH (RTECS) Number: 9999999ZZ
OSHA PEL: NOT APPLICABLE
ACGIH TLV: NOT APPLICABLE

Proprietary: NO
Ingredient: ING 5: IS REQUIRED BEFORE PUTTING ON STREET CLOTHES.
Ingredient Sequence Number: 06
NIOSH (RTECS) Number: 9999999ZZ
OSHA PEL: NOT APPLICABLE
ACGIH TLV: NOT APPLICABLE
=====

Physical/Chemical Characteristics

=====

Appearance And Odor: HEAVY, DUCTILE, SOFT, BLuish-GRAY METAL.
Boiling Point: 3164F, 1740C
Melting Point: 621F, 327C
Vapor Pressure (MM Hg/70 F): 1 @ 973C
Vapor Density (Air=1): N/A
Specific Gravity: 11.34 (H*20=1)
Evaporation Rate And Ref: N/A
Solubility In Water: INSOLUBLE
Percent Volatiles By Volume: N/A

=====

Fire and Explosion Hazard Data

=====

Flash Point: N/A
Lower Explosive Limit: N/A
Upper Explosive Limit: N/A
Extinguishing Media: CLASS D EXTINGUISHERS: DRY POWDER TYPE.
Special Fire Fighting Proc: USE NIOSH APPROVED SCBA AND FULL PROTECTIVE EQUIPMENT (FP N).
Unusual Fire And Expl Hazrds: NONCOMBUSTIBLE IN SOLID METAL FORM.
FLAMMABLE IN THE FORM OF DUST WHEN EXPOSED TO HEAT OR FLAME.

=====

Reactivity Data

=====

Stability: YES
Cond To Avoid (Stability): EXCESSIVE HEAT (IE, ABOVE MELTING POINT). SEE MATERIALS TO AVOID.
Materials To Avoid: REACTS VIOLENTLY W/HYDROGEN PEROXIDE, CHLORINE TRIFLUORIDE, AMMONIUM NITRATE, POTASSIUM. INCOMPAT WITH NAN*3, (SUPDAT)
Hazardous Decomp Products: WHEN HEATED TO ABOVE MELTING POINT (IE, DECOMPOSITION) EMITS HIGHLY TOXIC FUMES OF LEAD.
Hazardous Poly Occur: NO
Conditions To Avoid (Poly): NOT RELEVANT

=====

Health Hazard Data

=====

LD50-IC50 Mixture: NONE SPECIFIED BY MANUFACTURER.
Route Of Entry - Inhalation: YES
Route Of Entry - Skin: YES
Route Of Entry - Ingestion: YES
Health Haz Acute And Chronic: LEAD APPEARS ON THE NAVY LIST OF OCCUP CHEM REPRO HAZS. SEEK CONSULTATION FROM APPROP HEALTH PROFESSIONALS CONCERNING LATEST HAZ LIST INFO & SAFE HANDLING & EXPOSURE INFO (FP N). SKIN: MAY CAUSE IRRIT. EYES: MAY CAUSE IRRIT. NORMAL HANDLING OR PROCESSING OF LEAD MAY RESULT IN GENERATION OF LEAD DUST (EFTS OF OVEREXP)
Carcinogenicity - NTP: NO
Carcinogenicity - IARC: NO
Carcinogenicity - OSHA: NO
Explanation Carcinogenicity: NOT RELEVANT
Signs/Symptoms Of Overexp: HLTH HAZ: &/OR FUME. LEAD IS CUMULATIVE TOXIN, EFTS OF PB EXPOS MAY NOT DEVELOP QUICKLY. SYMPS INCL DECREASED PHYSICAL

http://msds.pdc.cornell.edu/msds/siri/q294/q176.html

FITNESS, LOSS OF APPETITE, ABDOMINAL PAINS, CONSTIPATION, FATIGUE, SLEEP DISTURBS, HEADACHE, ANEMIA, IRRITABILITY, TREMORS, HALLUCINATIONS & DISTORTED PERCEPTION, MUSCLE & JOINT PAIN, MUSCLE (SUPDAT)
Med Cond Aggravated By Exp: DISEASES OF THE BLOOD AND BLOOD FORMING ORGANS, KIDNEYS, NERVOUS SYSTEM AND REPRODUCTIVE SYSTEM.
Emergency/First Aid Proc: INHALATION: REMOVE TO FRESH AIR. GET IMMEDIATE MEDICAL ATTENTION. EYES: FLUSH WELL WITH WATER FOR AT LEAST 15 MINUTES. IF IRRITATION PERSISTS SEEK MEDICAL ATTENTION. SKIN: WASH AREA THOROUGHLY WITH SOAP AND WATER. INGESTION: GIVE WATER. SEEK IMMEDIATE MEDICAL ATTENTION.

Precautions for Safe Handling and Use

Steps If Matl Released/Spill: LEAD IN DUST FORM; MINIMIZE EXPOSURE. WEAR FULL PROTECTIVE CLOTHING INCLUDING NIOSH APPROVED RESPIRATORS. CLEAN UP USING DUSTLESS METHODS (IE, VACUUM, DO NOT USE COMPRESSED AIR). PLACE IN CLOSED LABELED CONTAINERS FOR RECYCLING OR PROPER DISPOSAL.
Neutralizing Agent: NONE SPECIFIED BY MANUFACTURER.
Waste Disposal Method: DISPOSE OF IN ACCORDANCE WITH ALL FEDERAL, STATE AND LOCAL REGULATIONS. MAY HAVE VALUE ON A RECYCLED BASIS.
Precautions-Handling/Storing: STRICT CONTROL OF ATMOSPHERIC CONCENTRATION IN PROCESSING AND WORK AREAS. KEEP MATERIAL DRY. AVOID STORAGE NEAR INCOMPATIBLE MATERIALS.
Other Precautions: NOT APPLICABLE.

Control Measures

Respiratory Protection: NIOSH APPROVED HIGH EFFICIENCY RESPIRATOR FOR DUST AND LEAD FUME. USE AND PROCESS IN A WELL VENTILATED AREA.
Ventilation: LOCAL EXHAUST: AS REQUIRED FOR LEAD DUST & FUME. MECHANICAL (GEN): AS REQUIRED TO MAINTAIN APPROP OSHA PEL/TLV LEVELS.
Protective Gloves: IMPERVIOUS GLOVES (FP N).
Eye Protection: ANSI APPRVD CHEM WORKERS GOGGLES (FP N).
Other Protective Equipment: ANSI APPRVD EYE WASH & DELUGE SHOWER (FP N).
FULL PROT CLTHG & SHOES, INCLUDING HARD HATS, REQD FOR WORK W/MOLTEN METAL.
Work Hygienic Practices: NO EATING, DRINKING OR SMOKING WHILE PROCESSING OR HANDLING LEAD OR IN LEAD AREAS. PRACTICE GOOD PERSONAL (ING 5)
Suppl. Safety & Health Data: MATL TO AVOID: ZR, DISODIUM ACETYLIDE & OXIDANTS. CAN REACT STRONGLY W/OXIDIZING MATLS. EFTS OF OVEREXP: WEAK. INHAL OF LARGE AMTS OF LEAD MAY LEAD TO SEIZURES, COMA & PALE SKIN, BLUE LINE AT GUM MARGIN, DECREASED HAND-GRIP & PARALYSIS OF WRIST JOINTS. PRINGD VERY HIGH EXPOS CAN ALSO RSLT IN KIDNEY DMG & (ING 2)

Transportation Data

Disposal Data

Label Data

Label Required: YES
Technical Review Date: 25MAR98
Label Date: 23MAR98
Label Status: G
Common Name: LEAD
Chronic Hazard: YES
Signal Word: WARNING!
Acute Health Hazard-Moderate: X
Contact Hazard-Slight: X
Fire Hazard-None: X
Reactivity Hazard-None: X
Special Hazard Precautions: ACUTE: EYES/SKIN: IRRITATION. CHRONIC: LEAD APPEARS ON THE NAVY OCCUPATIONAL CHEMICAL REPRODUCTIVE HAZARDS LIST (FP N).
<http://msds.pdc.cornell.edu/msds/siri/q294/q176.html>

SYMPTOMS OF LEAD OVEREXPOSURE INCLUDE DECREASED PHYSICAL FITNESS, LOSS OF APPETITE, ABDOMINAL PAINS, CONSTIPATION, FATIGUE, SLEEP DISTURBANCES, HEADACHE, ANEMIA, IRRITABILITY, TREMORS, HALLUCINATIONS AND DISTORTED PERCEPTION, MUSCLE AND JOINT PAIN, MUSCLE WEAKNESS, SEIZURES, COMA & DEATH. ANEMIA, PALE SKIN, BLUE LINE AT GUM MARGIN, DECREASED HAND-GRIP STRENGTH, ABDOMINAL PAIN, NAUSEA, VOMITING, AND PARALYSIS OF WRIST JOINTS. KIDNEY AND NERVOUS SYSTEM DAMAGE.

Protect Eye: Y

Protect Skin: Y

Protect Respiratory: Y

Label Name: TR METALS

Label Street: 1 PAVILION AVE

Label City: RIVERSIDE

Label State: NJ

Label Zip Code: 08075

Label Country: US

Label Emergency Number: 800-424-9300 (CHEMTREC)

ALDRICH CHEMICAL -- ARSENIC (III) OXIDE, 99.99%, 25548-3
MATERIAL SAFETY DATA SHEET
NSN: 681000N057756
Manufacturer's CAGE: 60928
Part No. Indicator: A
Part Number/Trade Name: ARSENIC (III) OXIDE, 99.99%, 25548-3

General Information

Company's Name: ALDRICH CHEMICAL CO INC
Company's Street: 1001 W ST PAUL AVE
Company's P. O. Box: 355
Company's City: MILWAUKEE
Company's State: WI
Company's Country: US
Company's Zip Code: 53201
Company's Emerg Ph #: 800-231-8327
Company's Info Ph #: 414-273-3850
Record No. For Safety Entry: 001
Tot Safety Entries This Stk#: 001
Status: SMJ
Date MSDS Prepared: 23NOV93
Safety Data Review Date: 25FEB97
MSDS Serial Number: CDMDC

Ingredients/Identity Information

Proprietary: NO
Ingredient: ARSENIC TRIOXIDE (SARA 302/313) (CERCLA)
Ingredient Sequence Number: 01
Percent: 99.99
NIOSH (RTECS) Number: CG3325000
CAS Number: 1327-53-3
OSHA PEL: SEE 1910.1018
ACGIH TLV: 0.01 MG/M3

Proprietary: NO
Ingredient: SUPP DATA: (SHOW LABEL WHERE POSSIBLE).
Ingredient Sequence Number: 02
NIOSH (RTECS) Number: 9999999ZZ
OSHA PEL: NOT APPLICABLE
ACGIH TLV: NOT APPLICABLE

Physical/Chemical Characteristics

Appearance And Odor: WHITE GRANULAR POWDER.
Specific Gravity: 3.74

Fire and Explosion Hazard Data

Extinguishing Media: NONCOMBUSTIBLE. USE EXTINGUISHING MEDIA APPROPRIATE TO SURROUNDING FIRE CONDITIONS.
Special Fire Fighting Proc: USE NIOSH APPROVED SCBA & FULL PROTECTIVE EQUIPMENT (FP N).
Unusual Fire And Expl Hazrds: EMITS TOXIC FUMES UNDER FIRE CONDITIONS.

Reactivity Data

Stability: YES
Cond To Avoid (Stability): HEAT. MAY DECOMPOSE ON EXPOSURE TO MOIST AIR OR WATER.
Materials To Avoid: ACIDS, OXIDIZING AGENTS, HALOGENS.
<http://msds.pdc.cornell.edu/msds/siri/q283/q455.html>

7/15/99

Hazardous Decomp Products: TOXIC FUMES OF ARSENIC OXIDES.
Hazardous Poly Occur: NO
Conditions To Avoid (Poly): NOT RELEVANT

Health Hazard Data

LD50-LC50 Mixture: LD50:(ORAL,RAT) 14,600 UG/KG.
Route Of Entry - Inhalation: YES
Route Of Entry - Skin: YES
Route Of Entry - Ingestion: YES
Health Haz Acute And Chronic: ACUTE:MAY BE FATAL IF INHALED, SWALLOWED OR ABSORBED THROUGH SKIN. MAY CAUSE IRRITATION. TOXIC EFFECTS. MAY ALTER GENETIC MATERIAL. TARGET ORGANS:SKIN, LUNGS. TARGET ORGAN DATA:BEHAVIORAL (SLEEP; MUSCLE WEAKNESS), CARDIAC (ARRYTHMIAS), LUNGS, THORAX/RESP (OTHER CHANGES; TUMORS), GI (HYPERMOTILITY, (EFTS OF OVEREXP)
Carcinogenicity - NTP: YES
Carcinogenicity - IARC: YES
Carcinogenicity - OSHA: YES
Explanation Carcinogenicity: ARSENIC TRIOXIDE:IARC MONOGRAPHS, SUPP, VOL 7, PG 100, 1987:GRP 1. NTP 7TH ANNUAL RPT ON CARCINS, 1994:KNOWN TO (SUPDAT)
Signs/Symptoms Of Overexp: HLTH HAZ:DIARR), LIVER (LIVER FUNC TESTS IMPAIRED), BLOOD (OTHER CHANGES), MUSCULO-SKELETAL (OTHER CHANGES), SKIN & APPENDAGES (CORR), EFTS ON FERTILITY (LITTER SIZE), EFTS ON EMBRYO/FETUS (CYTOLOGICAL CHANGES; FETOTOXICITY), SPECIFIC DEVEL ABNORMS (MUSCULOSKELETAL SYS), EFTS ON NEWBORN (APGAR SCORE; OTHER (SUPP DATA)
Med Cond Aggravated By Exp: NONE SPECIFIED BY MANUFACTURER.
Emergency/First Aid Proc: EYES:IMMEDIATELY FLUSH W/COPIOUS AMOUNTS OF WATER FOR AT LEAST 15 MINUTES. SKIN:IMMEDIATELY FLUSH W/COPIOUS AMOUNTS OF WATER FOR AT LEAST 15 MINUTES WHILE REMOVING CONTAM CLTHG & SHOES. DISCARD CONTAMINATED CLOTHING & SHOES. INHAL:REMOVE TO FRESH AIR. IF NOT BREATHING GIVE ARTF RESP. IF BREATHING IS DIFFICULT, GIVE OXYGEN. INGEST:WASH OUT MOUTH W/WATER PROVIDED PERSON IS CONSCIOUS. CALL MD IMMED.

Precautions for Safe Handling and Use

Steps If Matl Released/Spill: EVACUATE AREA. WEAR NIOSH APPROVED SCBA, RUBBER BOOTS & HEAVY RUBBER GLOVES. WEAR DISPOSABLE COVERALLS & DISCARD THEM AFTER USE. SWEEP UP, PLACE IN A BAG & HOLD FOR WASTE DISPOSAL. VENTILATE AREA & WASH SPILL SITE AFTER MATERIAL PICKUP IS COMPLETE.
Neutralizing Agent: NONE SPECIFIED BY MANUFACTURER.
Waste Disposal Method: BURN IN A LANDFILL SITE APPROVED FOR THE DISPOSAL OF CHEMICAL HAZARDOUS WASTES. OBSERVE ALL FEDERAL, STATE & LOCAL ENVIRONMENTAL REGULATIONS.
Precautions-Handling/Storing: DO NOT BREATHE DUST. DO NOT GET IN EYES, ON SKIN, ON CLOTHING. CARCINOGEN. MAY CAUSE CANCER. HIGHLY TOXIC. MUTAGEN. STORE IN A COOL, DRY PLACE.
Other Precautions: KEEP AWAY FROM COMBUST MATLS, HEAT, SPKS & OPEN FLAME. AVOID CONT W/ACID, METALS. MAY CAUSE HERITABLE GENETIC DMG. TOX BY INHAL, IN CONT W/SKIN & IF SWALLOWED. HARMFUL IF INHALED/SWALLOWED, USE ONLY W/ADEQ VENT/NIOSH APPRVD RESP (SUPDAT)

Control Measures

Respiratory Protection: WEAR APPROPRIATE NIOSH APPROVED RESPIRATOR.
Ventilation: USE ONLY IN A CHEMICAL FUME HOOD.
Protective Gloves: CHEMICAL-RESISTANT GLOVES.
Eye Protection: ANSI APPROVED CHEM WORKERS GOGGS(SUPDAT)
Other Protective Equipment: EYE WASH FOUNTAIN & DELUGE SHOWER WHICH MEET ANSI DESIGN CRITERIA (FP N). WEAR SUITABLE PROTECTIVE CLOTHING.
Work Hygienic Practices: WASH THOROUGHLY AFTER HANDLING.
Suppl. Safety & Health Data: EXPLAN OF CARCIN:BE CARCIN. CFR VOL 29, PG NEONATAL MEASURES/EFTS), CARCIN (NEOPLASTIC BY RTECS CRITERIA; EQUIVOCAL

TUMORIGENIC AGENT BY RTECS CRITERIA). EYE PROT:& FULL LGTH FCSHLD (FP N).
OTHER PREC:PROT. IF YOU FEEL UNWELL, SEEK MED ADVICE (ING 2)

=====

Transportation Data

=====

Disposal Data

=====

Label Data

=====

Label Required: YES

Technical Review Date: 03APR97

Label Date: 25FEB97

Label Status: G

Common Name: ARSENIC (III) OXIDE, 99.99%, 25548-3

Chronic Hazard: YES

Signal Word: DANGER!

Acute Health Hazard-Severe: X

Contact Hazard-Slight: X

Fire Hazard-None: X

Reactivity Hazard-None: X

Special Hazard Precautions: ACUTE:MAY BE FATAL IF INHALED, SWALLOWED OR
ABSORBED THROUGH SKIN. MAY CAUSE IRRITATION. TOXIC EFFECTS. MAY ALTER
GENETIC MATERIAL. TARGET ORGANS:SKIN, LUNGS. CHRONIC:CANCER HAZARD.
CONTAINS ARSENIC TRIOXIDE, WHICH IS LISTED AS A HUMAN LUNG CANCER
CARCINOGEN (FP N).

Protect Eye: Y

Protect Skin: Y

Protect Respiratory: Y

Label Name: ALDRICH CHEMICAL CO INC

Label Street: 1001 W ST PAUL AVE

Label P.O. Box: 355

Label City: MILWAUKEE

Label State: WI

Label Zip Code: 53201

Label Country: US

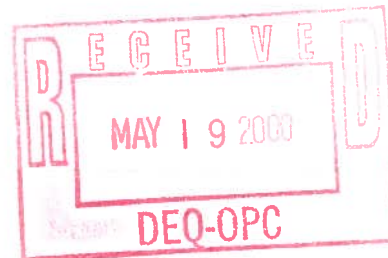
Label Emergency Number: 800-231-8327

ATTACHMENT B

EQUIPMENT DECONTAMINATION PROCEDURES

- The sampler and sample tubes will be cleaned using tap water and Liquinox. A brush will be used, if necessary, to remove particulate matter and surface films during cleaning.
- The equipment will then triple rinsed thoroughly with tap water, analyte free water and pesticide-grade isopropanol followed by a final rinse of analyte free water only. If analyte free water is not available, the equipment will be allowed to air dry following the solvent rinse. A solvent rinse will not be applied to PVC items or plastic items.
- Once the equipment has been cleaned it will be removed from the decontamination area and covered with aluminum foil when not in use.
- Equipment to be stored overnight will be wrapped in aluminum foil and covered with clean, unused plastic.
- The rinsate will be containerized and transferred to drums for characterization and disposal off-site in a permitted facility.

[illegible]

**Gulfport Police Department**2220 15th Street
Gulfport, Mississippi 39501
228-868-5962Officer: C. Young
Officer ID#: 639
Report #: 00-015068*"Police Helping People"*☐ Accident ☒ Offense ☐ Other Date: 021600**Services of Mississippi, Inc.**
Environmental Consulting Services -**FILE COPY**Ms Penelope "Penny" Johnston, Environmental Engineer
Mississippi Department of Environmental Quality
Uncontrolled Sites Section
P.O. Box 10385
Jackson, MS 39289-0385

Dear Penny,

Attached is a copy of "notice of intent" letter as provided for under the Nation Wide permit program that authorizes dredge and fill activities in tracts of less than three acres. A 24 X 30 CAD drawing was provided to the Corp for their use and a 11 X 17 provided to you and the Hancock Bank for your files. We will be please to print and forward you a large copy if needed.

We sent WOC Inc. of Gautier out last week to pick up the drums at the site with the soil being carried to Pecan Grove for disposal and the water being brought back to WOC Inc site for treatment in their facility then discharge into the Gautier Utility District system. The driver called me from the site saying he could only find one (1) drum. I had him search the area for the missing drums or any evidence that they had been dumped on site. He did not find any evidence nor did I at a later date. I instructed him to take the one (1) drum on to Pecan Grove Landfill as authorized and return the paperwork to me. I went to the North Gulfport Police substation and filled out an offense report stating five steel drums marked hazardous waste has been stolen from the site, I also explained , the waste was not hazardous but the idiots that stole the drums could not have known that. The thief report was taken by officer C. Young ID # 639 with the offense report being # 00-015068. I do not have a copy of the report because I would have had to go back the next day after 11:00AM to get a copy. If you want a copy, I will get one for you the next trip to Gulfport, probably later in the week, just let me know.

Sincerely

Louis Fortenberry

GULFPORT POLICE DEPARTMENT
Gulfport, Mississippi

FILE COPY

CASE NUMBER

00-015068

☐ JUVENILE INVOLVED

OFFENSE FORM 1

Type Offense Petit Larceny

Type Offense

Type of Offense

Location of Offense (Street Address)

33rd St. and 216th Ave (36 Acres of land all in GPT.)

Firm Name (If Commercial)

Offense Occurred Date 012500 to Date 020800
Between: Time 1000 to Time 1000

Date Reported 021600

Time Reported 1500

Day(s) of Week Offense Occurred Sun Tu W Th Fr Sat

Shift ☒ 1
☐ 2
☐ 3

1 Victim's Name (Last, First, Middle)

Butler Services of MS.

Home Address (City, State, Zip)

PO Box 1164 Pascagoula, MS

Home Phone

(228) 769-6983

Victim D.O.B.

Sex

Race

Social Security #

Employer / School & Address

Business Phone

2

* ☐ V ☒ RP
☐ W ☐ P

Name (Last, First, Middle)

Fortenberry, Louis W.

Home Address (City, State, Zip)

4514 Willow St. Pascagoula, MS

Home Phone

(228) 769-6984

D.O.B.

Sex

Race

Social Security #

Employer / School & Address

Business Phone

01435 M W 425-58-8640 Owner: Butler Services of MS. Inc (228) 769-6983

3

* ☐ V ☐ RP
☐ W ☐ P

Name (Last, First, Middle)

Home Address (City, State, Zip)

Home Phone

D.O.B.

Sex

Race

Social Security #

Employer / School & Address

Business Phone

Victim

1 ☒ 2 ☐ 3 ☐

Stranger

Scene Processed for Latent Prints?

☐ Yes ☒ No ☐ Attached ☐ None Found

☐ Alcohol Related

☐ Drug Related

Case Investigated:

☐ By Phone

☒ Walk-In

Suspect

1 ☐ 2 ☐ 3 ☐

Acquaintance

☐ No (Separate Narrative Required)

☐ Gaming Related

☐ Gang Related

☐ At Scene

☐ Other

Relationship

1 ☐ 2 ☐ 3 ☐

Relative

Status**

Qty.

Article

Brand, Make or Manufacturer

Model Name & Number

Description (Color, Size, etc.)

Serial # and/or Owner Applied Number

Value (☐ Entered on NCIC)

☐ E ☐ S ☐ D

☒ S

5 Containers

55gal. steel drums

*marked

\$225.00

☐ E ☐ S ☐ D

☐ S

Hazardous*

☐

☐ E ☐ S ☐ D

☐ S

Labeled "Butler Services of

Mississippi, Inc."

☐

☐ E ☐ S ☐ D

☐ S

☐

☐ E ☐ S ☐ D

☐ S

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☐ E ☐ S ☐ D

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☐

Vehicle

License Number

State

Veh. Year

Make / Style

Model

Color / Color

Value

☐ E ☐ S ☐ D

☐ S

☐

VIN Number

Vehicle Marks/Damage/Decals/Other Descriptors/Comments

Towed By:

Narrative of Offense (Attach Separate Narrative if Needed):

On 021600 1500 hrs, victim stated unk. persons removed the above listed items from a vacant area at the above location by unknown means between 012500-020800. Unk. person(s) then fled in unk. direction by unk. means.

Reporting Officer

I.D. #:

639 Name: C Young

Follow-Up Detective:

I.D. #:

Name:

Reviewing Supervisor:

I.D. #:

175 Name: [Signature]

MOI (See Reverse Side)

CODE

CODE

OFFENSE STATUS

1. Type of Premises

☒

8. Use of Weapon

☒

OPEN

CLOSED

2. Object of Attack

☒

9. Method of Departure

☒

☒ Suspended / Inactive

☐ Cleared Adult Arrest

☐ Referred To Family Court

3. Point of Entry

☒

10. Demeanor of Suspect

☒

☐ Patrol Follow-Up

☐ Cleared Exceptional Adult

☐ Referred To Justice Court

4. Method of Entry

☒

11. Evidence Obtained

☒

☐ Detective Follow-Up

☐ Cleared Juvenile Arrest

☐ Referred To:

5. Method of Attack (Person)

☒

12. Place of Offense

☒

SIGNED AFFIDAVIT?

☐ Cleared Exceptional Juvenile

Date of Status

6. Method of Attack (Property)

☒

13. Fraud Type

☒

☐ Yes ☒ No

☐ Other Cleared Exception

021600

7. Weapon Type

☒

14. Solvability Factors

☒

☐ Will Sign Later

☐ Unfounded

Evidence Disposition:

☐ Returned To Owner

N/A Property Room

☐ Court

☐ Detectives

Additional Agencies Involved:

☐ Federal

☐ State

☐ Other

N/A Medical

☐ Local

* V - Victim

AP - Person

** E - Evidence

S - Stolen

Attachments:

☐ Offense 2

☐ Narrative

☐ Custody

at witness D - Grant

R - Returned

D - Damaged

☐ Vehicle Inventory

☐ NCIC Copy

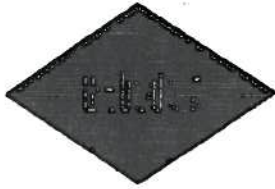
☐ Property Invoice

☐ Other

Page

01

01



Environmental Management Services Inc.
600 North 26th Avenue • Hattiesburg, Mississippi 39401
Telephone: (601) 544-3674 • Facsimile: (601) 544-0504

April 28, 2000

FAX MEMO

Attention: **Mr. Lewis Fortenberry**
Butler Services of Mississippi, Inc.
P.O. Box 1164
Pascagoula, MS 39568-1164

RE: Gulfport Fertilizer Project Sampling

Dear Mr. Fortenberry:



This is to confirm our conversation regarding the characterization sampling of the soil cuttings and purge water generated during the sampling activities in July/August, 1999 for the referenced site.

The attached copy of the Chain of Custody from that event lists the samples taken by EMS for both soil and water samples, per your request. Samples were obtained from each container and composited for the respective media. Two soil samples were shown, however, one is a duplicate from the same composite.

We note that six 55 gallon drums were furnished with labels which were completed by Butler Services.

I trust this complies with your request regarding the matter.

Clyde Woodward

CHAIN-OF-CUSTODY RECORD

FILE COPY

Burner Stances
of Mississippi
Jalcomper Job

SAMPLE CONTAINER DESCRIPTION[illegible]

Transporter 2 Condition

Alcoholismo et al.

Total Number of Conflicts:

PD# 1267
5 BSA

SAMPLE TRANSFER (protein original with examples)

1. Referred by: Jeffery Brown
(Name)

2. Referred by: _____

EMS
(Organization)

8-28-31
(Date/Time)

Received by: J. L. WOOD
(Name)

Wurde mit Hand (Organisation)
28.7.75 (Datum)

2 Redemptive need by:

(Kano)

(Defendants' Counsel)

Received by:

Abstract

(Organization)

Delellmas

Notes: Second Soil Columns Container is an Extra

APR. 27. 2000

4:38PM

CAVENHAM GULFPORT