ICON
Environmental Solutions, LLC

October 15, 2003

Mr. Tony Russell
Office of Pollution Control
Mississippi Department of Environmental Quality
101 West Capital Street
Jackson, MS 39201

Re: Gulf States Creosote Site
Clearing, Grubbing, Disposal of Stumps, & Backfilling Work Plan dated March 24, 2003
Parcel #5
West Pine Street
Hattiesburg, MS

Mr. Russell,

We would like to submit the following work plan for your review, and consideration, for Icon to proceed with the next phase of environmental testing and analysis, to determine if any residual contamination exist on the Former Gulf States Creosote Site, Parcel # 5 on West Pine Street.

This plan will detail the recommended removal, disposal and cleanup of the property, in the event any contamination is detected in the soil analysis.

We would appreciate your approval to proceed with the work plan as soon as possible. If you have any immediate questions prior to releasing your written statement please do not hesitate to contact me.

Regards,

Joe Ford

Joe Ford

Cc: Mr. John Fairchild

- **Pull core samples on eastern portion of site**
- **Provide analytical test on samples**
- **Determine contamination levels, if any**
- **Determine removal & disposal requirement(s) & method**
- **Finalize property remediation**

Former Gulf States Creosote Site
Parcel Number 5
West Pine Street
Hattiesburg, Mississippi

Prepared
October 15, 2003

By

Icon Environmental Solutions, LLC
210 West Front Street
Suite 100
Hattiesburg, MS 39401
601-543-0909

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1.0 Site Background

The Gulf States Creosote site is a former wood treating plant located in Hattiesburg, Mississippi. Since 1996, Kerr-McGee Chemical (KMC) has conducted extensive investigations to determine the extent of impacted media. Through the completion of the investigative process, the vertical and horizontal extent of impacted media has been fully delineated.

The site location for this phase of work is approximately 1.8 acres and is presented in Figure 1 and Figure 2. The site is bound to the west by a drainage ditch, to the south by Southern Railroad track, to the east by Strahan Auto Sales, and to the north by West Pine Street. As shown in Figure 2, the drainage ditch, which is positioned southeast to northwest, divides the site into approximately two halves (east and west). This document describes site activities in reference to the east portion. Previous investigations (Figure 2) indicated low levels of benzo(a)pyrene in soil samples SS-15 (0.033 mg/kg), SS-16 (1.10 mg/kg), and SS-17 (0.93 mg/kg). Due to these low level concentrations of benzo(a)pyrene, ICON Environmental was contracted to clear, grub and dispose of the timber, debris and stumps from the property. The stumps excavated on the western portion of the site were shredded with the tree debris and shrubs from the whole site. The stumps from the eastern portion of the site were pulled up and segregated for shredding. The segregated shredded stump material was sampled for analysis, which showed no creosote, or other hazardous chemical residue contamination. During the excavation no chemical residue, or chemical vapors, were physically detected or seen. Even though no contamination was found, the segregated shredded stump material was disposed of as burn fuel at Mobile Forrest Products in Alabama.

This document describes the second phase plan to pull soil samples for analytical test to be performed in identifying (1) if any creosote chemical residue remains in the soil on the eastern portion of the site (2) and if there is any residue found, to determine and initiate the most feasible way of excavating, removing, and disposing of the contaminated material.

2.0 Scope of Work

This project consist of:

- Setting a preliminary grid to determine five sample locations on the eastern portion
- Pulling soil samples from a depth of ten (10) feet for analysis
- A PID (Photo Ionization Device) will be used to identify the contamination points in each of the ten-foot sections of the five samples.
- The soil sample sections will then be analyzed to identify if any creosote chemical residue, or other toxic chemicals are within the soil.
- Once the analytical test results are obtained the decision will be made at that time to:
    (1) Cease any further work activity if no traces of contamination are found, or
    (2) Allow the landowner the option of leaving the property as it is, or
    (3) Determine the boundary of contamination and excavate the contamination, remove the contamination off-site to the proper landfill for disposal, and backfill with clean fill as needed.
    (4) The backfill will be transported from an off-site location and placed as needed on-site.

All activities shall be managed in accordance with applicable federal, state and local requirements. All transportation manifests and disposal certificates shall be retained and submitted to ICON for documentation.

3.0 Storm Water Pollution Prevention

3.1 Site Information

The site is presently clear of timber and the west side of the property has been reseeded with permanent grass for ground cover. The sampling of the soil will not disturb the area of the drainage ditch, or it's immediate surroundings. Three-fourths of the site has low erosion hazard. The remainder of the site has low to medium erosion hazard. On the south end of the property an earthen ditch is positioned east to west that flows into an earthen ditch positioned southeast to northwest. The ditches have intermittent flow with the direction of flow being from the southeast to northwest, draining into Gordon's Creek, which is not on the 303(d) list for siltation, turbidity, or habitat alterations. Therefore, additional controls that are warranted for a site discharging to listed receiving streams are not required.

3.2 Controls

Vegetative Controls: After completion of the sampling and finalizing the remediation of the property, the eastern portion will be seeded (permanent seeding) within seven calendar days.

Structural Controls: A construction entrance will be built and accumulation of mud on vehicle tires will be washed, if needed, during muddy conditions.

Housekeeping Practices: All equipment maintenance and repair will be done offsite. Trash cans will be placed onsite as needed. Paints, solvents, fertilizers, or any other potentially toxic materials will not be stored on site.

Post Construction / Storm Water Management Measures: Additional vegetative and structural controls will be placed onsite as needed.

3.3 Implementation Sequence

1/ Identify sample locations.	2/ Pull soil samples.	3/ Perform analytical tests.
4/ Identify any contamination.	5/ Excavate contamination	6/ Remove and dispose cont.
7/ Backfill, if needed.	8/ Reseed eastern portion	9/ Maintenance plan

3.4 Maintenance Plan

Check all disturbed areas, erosion and sediment controls after each significant rainfall but not less than once per week. Make needed repairs within 24 hours. Replace non-functional silt fence. Maintain all vegetated areas to provide proper ground cover – reseed and fertilize as needed.

4.0 HEALTH AND SAFETY PLAN (HASP)

The project activities consist of griding the eastern portion of the site for identifying five (5) sample locations. Pulling five core samples to a depth of ten (10) feet. Analyzing each core section for sample dissection with a PID (Photo Ionization Device), perform analytical test of sample material to determine if contamination is present. If any contamination is found the landowner(s) will decide whether to cease all work and leave the property as the designated plan in the Phase I work plan, or continue work to excavate contamination, remove and dispose of contaminated material in the proper landfill and backfill if needed. Clean backfill will be transported from an off-site location and placed as needed on-site. All transportation and removal of contaminated material shall be managed in accordance with all applicable Federal, State, and local requirements. All transportation manifests and disposal certificates shall be retained and submitted to ICON for documentation. The site is bound to the west by the drainage ditch, to the south by Southern Railroad track, to the east by Strahan Auto Sales, and to the north by West Pine Street. A site location map is provided as Figure 1 and Figure 2.

The following authorizes this HASP:

Michael Kolkana, C-MAC Environmental Services, Site Safety Officer Date

Joe Ford, ICON Environmental Solutions, LLC, Project Manager Date

4.2 Staff Organization

Project Manager Joe Ford – As Project Manager on this site, Mr. Ford will assume responsibility for the overall co-ordination of on-site and off-site activities.

Site Safety Officer Michael Kolkana – As Site Safety Officer (SSO), Mr. Kolkana will be responsible for collecting and maintaining documentation of each worker, conducting and documentation of the daily tool box safety meeting, and maintenance of current emergency response and medical assistance phone numbers throughout the project.

Alternate Site Safety Officer(s)	Chris Steward	(C-MAC Environmental)
	Joe Ford	(ICON Environmental)
	Doug Brewer	(RDA Construction)

– Will assume the duties of the SSO when the SSO is not on the project site.

Technicians / Operators Will be responsible for heavy equipment operation and general labor on the site. They will report directly to the Project Manager or SSO.

4.3 Work Activities

Pre-construction site reconnaissance This activity will consist of a general recognizance of the site to include locating underground and aboveground utilities and structures that may be present onsite that could be affected by site activities.

Setting preliminary grid to identify core locations This activity consists of the orientation of five core locations on the eastern portion of the site.

Pulling Core Samples Pull five (5) core samples down to a depth of ten (10) feet and then use a PID (Photo Ionization Device) to identify the strongest contamination point of each of the five samples. The section of the highest reading will be analyzed for contamination. If no contamination levels are detected a section of the ten-foot core will still be analyzed for verification purposes.

Run Analytical Test & Review Results This activity will determine if any contamination is evident in the soil on the eastern portion of the site. (1) If none is found, no other work will be done other than reseed the eastern portion and complete the maintenance profile. (2) If contamination is found, the decision will be made by the landowners on whether to cease work and leave the property "capped" as it is. Or (3) excavate the contaminated soil, remove and dispose of in the proper landfill, and backfill the property as needed and perform maintenance.

Backfilling This activity consists of backfilling the site as needed with clean soil from off-site. The backfill shall be free from roots, trash, debris, frozen material, and stones larger than 3 inches.

Storm water Pollution Prevention This activity may consist of one or all of the following: Vegetative controls, structural controls, housekeeping practices, post construction/storm water management measures, implementation, and maintenance.

4.4 Hazard Assessment

Previous environmental assessments indicate that chemical hazards are not present on this site. However, all precautions will be taken to ensure that no site worker comes in contact with any suspicious looking materials (soils, liquids). In the event suspicious materials are encountered, site workers will cease in that area and all appropriate notifications will be made. All site workers will be briefed on the site's previous creosoting activities and the hazards associated with exposure to creosote. An MSDS for Creosote is included as Appendix A in this document and will be reviewed with all site workers.

4.5 General Health and Safety Requirements

In the event an ICON Environmental employee or subcontractor is exposed to a known on-site chemical hazard, that person will then be examined by a qualified medical doctor.

All accidents will be immediately reported to the SSO who will report them immediately to the project manager. The project manager will make the necessary notifications as appropriate. Local emergency services may be called to the site by dialing 911.

If an off-site chemical hazard is identified the subject area will be deemed an exclusion zone. Access to the exclusion zone will be limited to persons in compliance with 29 CFR 1910.120 (HAZWOPER).

No work will be performed during periods of lightning, or other severe weather conditions. No work will be performed in any exclusion zones, or in excavations, which are not in compliance with OSHA regulations related to trenches.

Appropriate PPE and work area visual observations will be conducted as determined by SSO.

4.6 Site Specific Health and Safety Requirements

It is expected that work on this site will be conducted in Level D, generally consisting of hardhat, steel toed boots/shoes, gloves, safety glasses, and hearing protection (as needed). Decontamination at this level will consist of washing shoes/boots upon leaving site and a recommendation to immediately change, or wash daily work clothes upon returning to home/hotel.

Heavy Equipment that is used on-site which comes in contact with contaminated soil will be washed either with potable water and detergent, or with potable water via a pressure washer. The rinsate will either be collected and disposed of off-site or sent to the local POTW, or storm sewer. Disposal to the POTW or storm sewer will be pursued first and ICON Environmental will obtain any necessary permits.

4.7 Emergency Response Procedures

The nearest medical facility is Forrest General Hospital and may be contacted directly by dialing 288-2100. Emergency medical services may be called to the site by dialing 911. The site has no land based telephone service, cell phones will be maintained on-site at all times in case of emergency.

A map showing the route to and from the site to Forrest General Hospital is included as Figure 1.

4.8 Logs, Reports, and Record Keeping of Health and Safety Documents

Daily tool box safety meetings will be held and documented on the Daily Tool Box Safety Meeting form. This documentation will be maintained by ICON Environmental. The daily tool box safety meeting form is presented below.

Documentation to establish compliance with 29 CFR 1910.120 for each employee will be maintained on-site by the SSO.

The undersigned have read and understand the site safety plan and agree to comply with all requirement listed.

Name (printed)	Name (signed)	Date

Daily Tool Box Safety Meeting Form
ICON Environmental Solutions, LLC

Project Number / Name: _____ Date: _____

Location: _____ Meeting conducted by: _____

Time started: _____ Time ended: _____ Total minutes: _____

Project Manager: _____ Site Safety Officer: _____

Alternate Site Safety Officer: _____

1) Daily scope of work topics:
   A)
   B)

2) Daily Chemical / Physical Hazards:
   A)
   B)

Chemical	Exposure Limit	Exposure Route	Symptom	Physical Hazards
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

3) Accidents Reviewed: _____

4) Storm Water Controls Necessary? Yes / No List Control Measures

5) Comments / Suggestions: _____
_____

6) Personal Protective Levels / Tasks:

Level	PPE Description	Work Task	Type Cartridge
_____	_____	_____	_____
_____	_____	_____	_____

7) Signed by Those in Attendance:

Name (printed)	Name (signature)	Company

5.0 PROJECT DELIVERABLES AND SCHEDULE

On completion of all activities listed in this work plan a report will be prepared and submitted to MDEQ. The report will describe all related activities completed during this phase of work.

The schedule of activities to be completed as part of this phase of work includes the following:

- Utility search and clearance to proceed with soil sampling on site
- Grid east side of site to identify and locate sample locations
- Pull sample cores and analyze sample material for analytical test
- Complete analytical test and review results to determine remainder of work plan method
- If no contamination is found site will be reseeded and maintenance plan will be enacted
- If contamination is found, the landowner may decide to cease all work activity and leave as is, or
- Continue with excavation of contamination, remove & dispose contamination in proper landfill, then backfill if needed.
- Backfill will be moved from off-site location as needed to restore site
- Reseed site with permanent cover and implement maintenance plan
- Weekly erosion and sediment control inspections (1 month or until stabilized) (The inspections will be submitted an addendum)

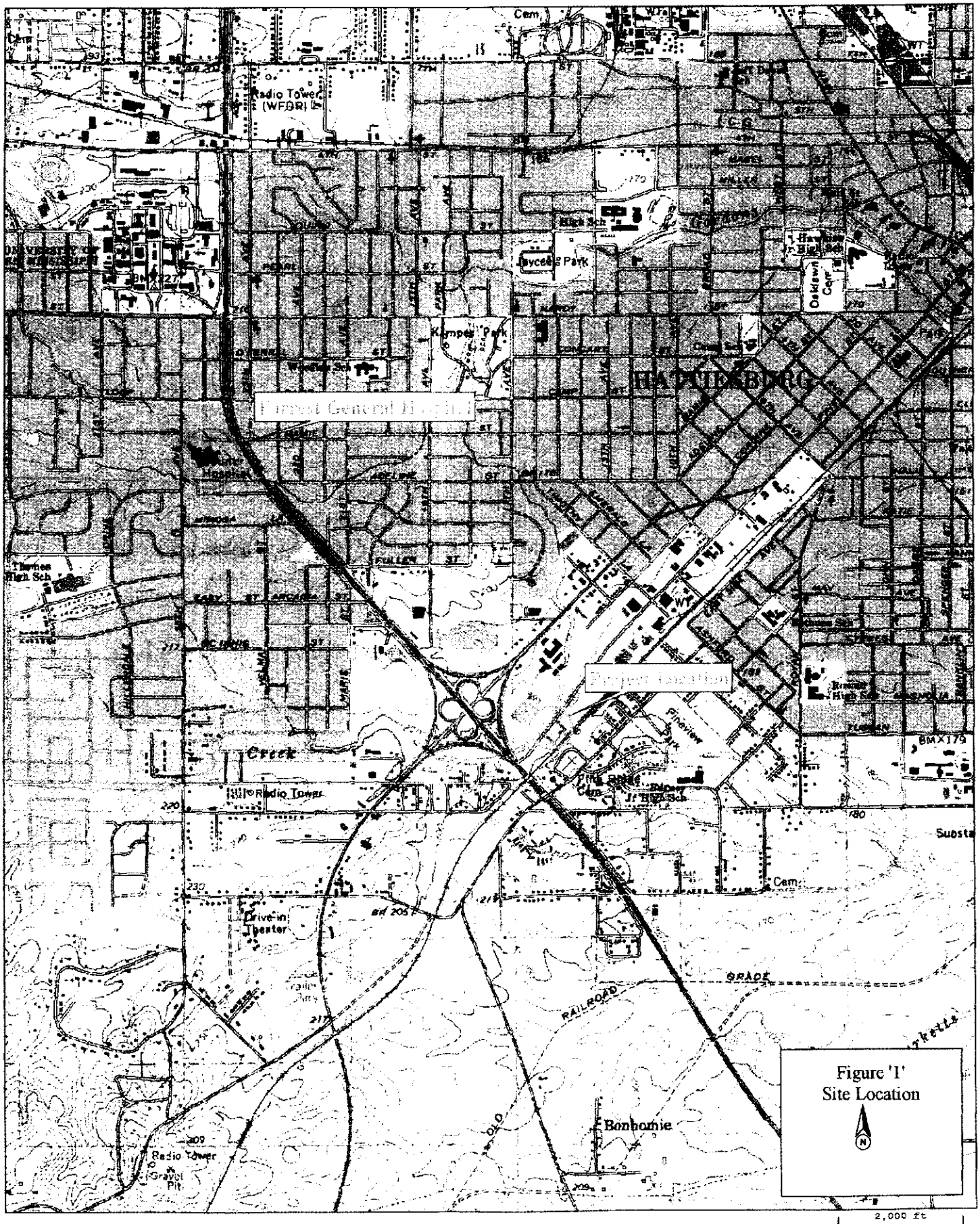
Assuming no delays during completion of the fieldwork, the testing and construction phase of work should be completed in approximately 5 to 6 weeks. The weekly inspections will be completed in approximately 4 weeks following restoration.

1) 3 days	Grid site and pull core samples
2) 3 weeks	Run analytical test for determination of soil contamination
3) 2 weeks	Complete excavation and removal of contamination, reseed site
4) 4 weeks	Monitor site and drainage

The initiation of field activities will commence within 2 to 4 days of approval of the work plan by MDEQ.

6.0 REFERENCES

Michael Pisani & Associates, Inc. 2002. Final Remedial Action Work Plan, Former Gulf States Creosoting Site, Hattiesburg, Mississippi: August 21, 2002



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