

## Tronox LLC, Columbus

### General Information

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

### Address

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

### Telecommunications

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

### Alternate / Historic AI Identifiers

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

### Regulatory Programs

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

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

**Locational Data**

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

10/13/2006 10:29:50 AM

## Kerr McGee Chemical Corporation, Columbus

### General Information

| ID   | Branch   | SIC  | County  | Basin           | Start      | End |
|------|----------|------|---------|-----------------|------------|-----|
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| 168000020    | Kerr McGee Chemical Corporation, Columbus | Air-Construction              | 06/12/1998 |            |
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| MSP090021    | Kerr McGee Chemical Corporation, Columbus | Water-Pretreatment            | 10/11/1994 | 10/10/1999 |
| MSP090021    | Kerr McGee Chemical Corporation, Columbus | Water-Pretreatment            | 08/23/2000 | 07/31/2005 |
| MSP090021    | Kerr McGee Chemical Corporation, Columbus | Water-Pretreatment            | 10/31/2005 | 09/30/2010 |

### Regulatory Programs

| Program | SubProgram | Start Date | End Date |
|---------|------------|------------|----------|
|         |            |            |          |

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

**Locational Data**

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

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

Compliance file  
(yellow)



**Mississippi Department of Environmental Quality  
Office of Pollution Control  
Hazardous Waste Compliance Inspection Report**

**Site Name:** Kerr McGee Chemical Corporation, Columbus

**EPA ID:** MSD990866329

**Permit No:**

|                     |              |
|---------------------|--------------|
| Hazardous Waste-TSD | MSD990866329 |
|---------------------|--------------|

**Physical Address**

2300 14th Avenue North  
Columbus, MS 39701

Lowndes County

**Mailing Address**

PO Box 25861  
Oklahoma City, Oklahoma 73125

**Date of Evaluation:** 06/14/05

**Evaluation Type:** Compliance Evaluation Inspection - CEI

**Investigator:** Larry Hamil

**Significant Non-Complier:** N

**Comments:** As manufacturing operations at this location were discontinued in late 2003 followed by dismantlement of the plant, hazardous wastes are no longer generated. Drainage ditch excavation activities along the north and east boundaries of the site were conducted in late 2004. Soil and sediment removed was de-watered on site and manifested for subsequent disposal in accordance with hazardous waste procedures as a precaution, although the material qualified for exemption. The first shipment of separated Penta product, collected from groundwater pumping activities since plant closure and commencement of operations of the new pre-treatment system, is scheduled for the week of June 19, 2005. The 38,000 gallon capacity storage tank is estimated to presently contain about 30,000 gallons. The product will be transported to a wood treating facility in Arkansas for recycling in its manufacturing process.

No RCRA issues were noted during the multi-media inspection. Mr. Roland Hill, the site caretaker, is a very competent and responsible individual.

**Signature:**

A handwritten signature in black ink, appearing to read 'Larry Hamil', written over a horizontal line.

**Date:** 9-15-05

cc: Data Integration Division

# Mississippi Department of Environmental Quality Office of Pollution Control

## TSD Facilities

- |  |  |
|--|--|
| <input type="checkbox"/> DCH - Chemical/Physical/Biological        | <input type="checkbox"/> DSI - Surface Impoundments                  |
| <input checked="" type="checkbox"/> DCL - Closure/Post-Closure     | <input type="checkbox"/> DTR - Waste Tanks                           |
| <input type="checkbox"/> DCP - Contingency Plan                    | <input type="checkbox"/> DTT - Thermal Treatment                     |
| <input checked="" type="checkbox"/> DFR - Financial Responsibility | <input type="checkbox"/> DWP - Waste Pile                            |
| <input checked="" type="checkbox"/> DGS - General Standards        | <input type="checkbox"/> CAS - C/A Compliance Schedule               |
| <input checked="" type="checkbox"/> DGW - Groundwater Monitoring   | <input type="checkbox"/> FEA - Former Enforcement Agreements         |
| <input type="checkbox"/> DIN - Incineration                        | <input type="checkbox"/> CSS - Compliance Schedule Violation         |
| <input type="checkbox"/> DLF - Landfill                            | <input type="checkbox"/> BRR - Differ Stds for Regulation of Residue |
| <input type="checkbox"/> DLB - Land Ban                            | <input type="checkbox"/> BPS - BIF Permit Standards                  |
| <input type="checkbox"/> DLT - Land Treatment                      | <input type="checkbox"/> BIS - BIF Interim Standards                 |
| <input type="checkbox"/> DMC - Container Management                | <input type="checkbox"/> BCE - BIF Stds to Control Emissions         |
| <input type="checkbox"/> DMR - Manifest                            | <input type="checkbox"/> BDT - BIF Stds to Direct Transfer           |
| <input checked="" type="checkbox"/> DOR - Other Requirements       | <input type="checkbox"/> DIA - Incinerator Waste Analysis            |
| <input type="checkbox"/> DOT - Other Requirements (Oversight)      | <input type="checkbox"/> DPS - Incinerator Performance Standards     |
| <input type="checkbox"/> DPB - Part B Permit Application           | <input type="checkbox"/> DOP - Incinerator Operating Requirements    |
| <input type="checkbox"/> DPP - Preparedness Prevention             | <input type="checkbox"/> DMI - Incinerator Monitoring and Inspection |

## Generator Facilities

- |   |   |
|---|---|
| <input type="checkbox"/> GER - All Requirements (Oversight) | <input type="checkbox"/> GPT - Pre-Transport      |
| <input type="checkbox"/> GGR - General Requirements         | <input type="checkbox"/> GRR - Recordkeeping      |
| <input type="checkbox"/> GMR - Manifest                     | <input type="checkbox"/> GSC - Special Conditions |
| <input type="checkbox"/> GLB - Land Ban                     | <input type="checkbox"/> GSQ - SQG Requirements   |
| <input type="checkbox"/> GOR - Waste Min. Program           | <input type="checkbox"/> CESQG Requirements       |
| Annual/Biennial HW Report                                   |   |

## Transporters

- |   |   |
|---|---|
| <input type="checkbox"/> TGR - General Standards  | <input type="checkbox"/> TWD - HW Discharges    |
| <input type="checkbox"/> TMR - Manifest           | <input type="checkbox"/> TRR - All Requirements |
| <input type="checkbox"/> TOR - Other Requirements |   |



**Mississippi Department of Environmental Quality  
Office of Pollution Control  
Hazardous Waste Compliance Inspection Report**

**Site Name:** Kerr McGee Chemical Corporation, Columbus

**EPA ID:** MSD990866329

**Permit No:** Hazardous Waste-TSD MSD990866329

**Physical Address**

2300 14th Avenue North  
Columbus, MS 39701  
Lowndes County

**Mailing Address**

PO Box 25861  
Oklahoma City, Oklahoma 73125

**Date of Evaluation:** 5/10/05

**Evaluation Type:** Operation and Maintenance - OM

**Investigator:** David Peacock

**Significant Non-Complier:** N

**Comments:** An Operation & Maintenance (O&M) Inspection and a Compliance Evaluation Inspection (CEI) were conducted on 05/10/05 at Kerr-McGee Chemical Corporation's Columbus, Mississippi facility. These inspections were to determine Kerr-McGee's compliance to conditions set forth in its RCRA permit, applicable Mississippi Hazardous Waste Regulations, and current EPA approved protocols for monitor well sampling.

Boundary of the facility is fenced and locked with the closed RCRA impoundment having an additional fence. All observed monitor wells were locked, labeled, and in good condition. The groundwater recovery system was operating efficiently (pumping at a rate of 31 gpm when observed). All recovered groundwater is run through an oil/water separator and the recovered creosote is stored on site in a 17,000 gallon tank. Recovered product will be sold when tank is full. After recovered water leaves oil/water separator it is discharged to City of Columbus POTW. No hazardous waste is generated at the facility. All recordkeeping as required by facility's permit was complete and up-to-date.

Static water levels were determined (to the nearest .01 foot) in each well using an electronic water level indicator. Each well is purged ( 3 well volumes) using a disposable PVC bailer and nylon string. Parameters are monitored during bailing (Hanna Instruments). All purge water was collected in 55 gallon drums and disposed of into facility's oil/water separator. Once purging was completed, samples were collected using a dedicated stainless steel bailer. Samples were collected into laboratory-supplied glassware (Lancaster Labs, Lancaster, PA), placed on ice, and proper chain-of-custody paperwork was completed.

**Signature:** \_\_\_\_\_

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

# Mississippi Department of Environmental Quality Office of Pollution Control

## TSD Facilities

- |  |  |
|--|--|
| <input type="checkbox"/> DCH - Chemical/Physical/Biological      | <input type="checkbox"/> DSI - Surface Impoundments                  |
| <input checked="" type="checkbox"/> DCL - Closure/Post-Closure   | <input type="checkbox"/> DTR - Waste Tanks                           |
| <input type="checkbox"/> DCP - Contingency Plan                  | <input type="checkbox"/> DTT - Thermal Treatment                     |
| <input type="checkbox"/> DFR - Financial Responsibility          | <input type="checkbox"/> DWP - Waste Pile                            |
| <input checked="" type="checkbox"/> DGS - General Standards      | <input type="checkbox"/> CAS - C/A Compliance Schedule               |
| <input checked="" type="checkbox"/> DGW - Groundwater Monitoring | <input type="checkbox"/> FEA - Former Enforcement Agreements         |
| <input type="checkbox"/> DIN - Incineration                      | <input type="checkbox"/> CSS - Compliance Schedule Violation         |
| <input type="checkbox"/> DLF - Landfill                          | <input type="checkbox"/> BRR - Differ Stds for Regulation of Residue |
| <input type="checkbox"/> DLB - Land Ban                          | <input type="checkbox"/> BPS - BIF Permit Standards                  |
| <input type="checkbox"/> DLT - Land Treatment                    | <input type="checkbox"/> BIS - BIF Interim Standards                 |
| <input type="checkbox"/> DMC - Container Management              | <input type="checkbox"/> BCE - BIF Stds to Control Emissions         |
| <input type="checkbox"/> DMR - Manifest                          | <input type="checkbox"/> BDT - BIF Stds to Direct Transfer           |
| <input type="checkbox"/> DOR - Other Requirements                | <input type="checkbox"/> DIA - Incinerator Waste Analysis            |
| <input type="checkbox"/> DOT - Other Requirements (Oversight)    | <input type="checkbox"/> DPS - Incinerator Performance Standards     |
| <input type="checkbox"/> DPB - Part B Permit Application         | <input type="checkbox"/> DOP - Incinerator Operating Requirements    |
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## Generator Facilities

- |  |   |
|--|---|
| <input type="checkbox"/> GER - All Requirements (Oversight)    | <input type="checkbox"/> GPT - Pre-Transport      |
| <input checked="" type="checkbox"/> GGR - General Requirements | <input type="checkbox"/> GRR - Recordkeeping      |
| <input type="checkbox"/> GMR - Manifest                        | <input type="checkbox"/> GSC - Special Conditions |
| <input type="checkbox"/> GLB - Land Ban                        | <input type="checkbox"/> GSQ - SQG Requirements   |
| <input type="checkbox"/> GOR - Waste Min. Program              | <input type="checkbox"/> CESQG Requirements       |
| Annual/Biennial HW Report                                      |   |

## Transporters

- |   |   |
|---|---|
| <input type="checkbox"/> TGR - General Standards  | <input type="checkbox"/> TWD - HW Discharges    |
| <input type="checkbox"/> TMR - Manifest           | <input type="checkbox"/> TRR - All Requirements |
| <input type="checkbox"/> TOR - Other Requirements |   |





**Mississippi Department of Environmental Quality  
Office of Pollution Control  
Hazardous Waste Compliance Inspection Report**

**Site Name:** Kerr McGee Chemical Corporation, Columbus

**EPA ID:** MSD990866329

**Permit No:** Hazardous Waste-TSD MSD990866329

**Physical Address**

2300 14th Avenue North  
Columbus, MS 39701  
Lowndes County

**Mailing Address**

PO Box 25861  
Oklahoma City, Oklahoma 73125

**Date of Evaluation:** 5/10/05

**Evaluation Type:** Operation and Maintenance - OM

**Investigator:** David Peacock

**Significant Non-Complier:** N

**Comments:** An Operation & Maintenance (O&M) Inspection and a Compliance Evaluation Inspection (CEI) were conducted on 05/10/05 at Kerr-McGee Chemical Corporation's Columbus, Mississippi facility. These inspections were to determine Kerr-McGee's compliance to conditions set forth in its RCRA permit, applicable Mississippi Hazardous Waste Regulations, and current EPA approved protocols for monitor well sampling.

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**Signature:**

*David K. Peacock*

**Date:**

*06/22/05*



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Lowndes County

**Mailing Address**

PO Box 25861  
Oklahoma City, Oklahoma 73125

**Date of Evaluation:** 05/10/2005

**Evaluation Type:** Compliance Evaluation Inspection - CEI

**Investigator:** David Peacock

**Significant Non-Complier:** N

**Comments:** See Operation & Maintenance Inspection report

**Signature:**

*David K. Peacock*

**Date:**

*06/22/05*

cc: Data Integration Division

# Mississippi Department of Environmental Quality Office of Pollution Control

## TSD Facilities

- |  |  |
|--|--|
| <input type="checkbox"/> DCH - Chemical/Physical/Biological      | <input type="checkbox"/> DSI - Surface Impoundments                  |
| <input checked="" type="checkbox"/> DCL - Closure/Post-Closure   | <input type="checkbox"/> DTR - Waste Tanks                           |
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| <input type="checkbox"/> DLB - Land Ban                          | <input type="checkbox"/> BPS - BIF Permit Standards                  |
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| <input type="checkbox"/> DMR - Manifest                          | <input type="checkbox"/> BDT - BIF Stds to Direct Transfer           |
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| Annual/Biennial HW Report                                      |   |

## Transporters

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Office of Pollution Control  
Hazardous Waste Compliance Inspection Report**

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**EPA ID:** MSD990866329

**Permit No:** Hazardous Waste-TSD MSD990866329

**Physical Address**

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Columbus, MS 39701  
Lowndes County

**Mailing Address**

2300 14th Avenue North  
Columbus, Mississippi 39701

**Date of Evaluation:** 5/11/04 9:00:00 AM

**Evaluation Type:** Compliance Monitoring Evaluation - CME

**Investigator:** Wayne Stover

**Significant Non-Complier:** N

**Comments:** As a result of the inspection, it was determined there were no apparent violations of the Hazardous Waste Permit or the Mississippi Hazardous Waste Management Regulations.

**Signature:** C. Wayne Stover  
**Date:** 6/23/04

cc: Data Integration Division

# Mississippi Department of Environmental Quality Office of Pollution Control

## TSD Facilities

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| <input type="checkbox"/> DPB - Part B Permit Application         | <input type="checkbox"/> DOP - Incinerator Operating Requirements    |
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| <input type="checkbox"/> GLB - Land Ban  | <input type="checkbox"/> GSQ - SQG Requirements   |
| <input type="checkbox"/> GOR - Waste Min. Program<br>Annual/Biennial HW Report | <input type="checkbox"/> CESQG Requirements       |

## Transporters

- |   |   |
|---|---|
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**Mississippi Department of Environmental Quality  
Office of Pollution Control  
Hazardous Waste Compliance Inspection Report**

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**EPA ID:** MSD990866329

**Permit No:** Hazardous Waste-TSD MSD990866329

**Physical Address**

2300 14th Avenue North  
Columbus, MS 39701  
Lowndes County

**Mailing Address**

2300 14th Avenue North  
Columbus, Mississippi 39701

**Date of Evaluation:** 5/11/04 9:00:00 AM

**Evaluation Type:** Compliance Evaluation Inspection - CEI

**Investigator:** Wayne Stover

**Significant Non-Complier:** N

**Comments:** There were no apparent violations.

**Signature:**

*C. Wayne Stover*

**Date:**

*6/23/04*

cc: Data Integration Division

# Mississippi Department of Environmental Quality Office of Pollution Control

## TSD Facilities

- |  |  |
|--|--|
| <input type="checkbox"/> DCH - Chemical/Physical/Biological        | <input type="checkbox"/> DSI - Surface Impoundments                  |
| <input checked="" type="checkbox"/> DCL - Closure/Post-Closure     | <input type="checkbox"/> DTR - Waste Tanks                           |
| <input checked="" type="checkbox"/> DCP - Contingency Plan         | <input type="checkbox"/> DTT - Thermal Treatment                     |
| <input checked="" type="checkbox"/> DFR - Financial Responsibility | <input type="checkbox"/> DWP - Waste Pile                            |
| <input checked="" type="checkbox"/> DGS - General Standards        | <input type="checkbox"/> CAS - C/A Compliance Schedule               |
| <input type="checkbox"/> DGW - Groundwater Monitoring              | <input type="checkbox"/> FEA - Former Enforcement Agreements         |
| <input type="checkbox"/> DIN - Incineration                        | <input type="checkbox"/> CSS - Compliance Schedule Violation         |
| <input type="checkbox"/> DLF - Landfill                            | <input type="checkbox"/> BRR - Differ Stds for Regulation of Residue |
| <input type="checkbox"/> DLB - Land Ban                            | <input type="checkbox"/> BPS - BIF Permit Standards                  |
| <input type="checkbox"/> DLT - Land Treatment                      | <input type="checkbox"/> BIS - BIF Interim Standards                 |
| <input checked="" type="checkbox"/> DMC - Container Management     | <input type="checkbox"/> BCE - BIF Stds to Control Emissions         |
| <input checked="" type="checkbox"/> DMR - Manifest                 | <input type="checkbox"/> BDT - BIF Stds to Direct Transfer           |
| <input type="checkbox"/> DOR - Other Requirements                  | <input type="checkbox"/> DIA - Incinerator Waste Analysis            |
| <input type="checkbox"/> DOT - Other Requirements (Oversight)      | <input type="checkbox"/> DPS - Incinerator Performance Standards     |
| <input type="checkbox"/> DPB - Part B Permit Application           | <input type="checkbox"/> DOP - Incinerator Operating Requirements    |
| <input checked="" type="checkbox"/> DPP - Preparedness Prevention  | <input type="checkbox"/> DMI - Incinerator Monitoring and Inspection |

## Generator Facilities

- |   |   |
|---|---|
| <input type="checkbox"/> GER - All Requirements (Oversight) | <input type="checkbox"/> GPT - Pre-Transport      |
| <input type="checkbox"/> GGR - General Requirements         | <input type="checkbox"/> GRR - Recordkeeping      |
| <input type="checkbox"/> GMR - Manifest                     | <input type="checkbox"/> GSC - Special Conditions |
| <input type="checkbox"/> GLB - Land Ban                     | <input type="checkbox"/> GSQ - SQG Requirements   |
| <input type="checkbox"/> GOR - Waste Min. Program           | <input type="checkbox"/> CESQG Requirements       |
| Annual/Biennial HW Report                                   |   |

## Transporters

- |   |   |
|---|---|
| <input type="checkbox"/> TGR - General Standards  | <input type="checkbox"/> TWD - HW Discharges    |
| <input type="checkbox"/> TMR - Manifest           | <input type="checkbox"/> TRR - All Requirements |
| <input type="checkbox"/> TOR - Other Requirements |   |



**Mississippi Department of Environmental Quality  
Office of Pollution Control  
Hazardous Waste Compliance Inspection Report**

**Site Name:** Kerr McGee Chemical Corporation, Columbus

**EPA ID:** MSD990866329

**Permit No:** N/A

Hazardous Waste-TSD

MSD990866329

**Physical Address**

2300 14th Avenue North  
Columbus, MS 39701  
Lowndes County

**Mailing Address**

2300 14h Avenue North  
Columbus, MS 39701

**Date of Inspection:** 08/22/02

**Investigator:** Larry Hamil

**Significant Non-Complier:** N

**Comments:** As the plant manager and assistant plant manager were both attending corporate meeting in Oklahoma City on the day of the inspection, I was escorted and assisted by Mr. Charles Johnson, Shipping Supervisor. Mr. Johnson was thoroughly knowledgeable of the facility's practices and operations toward maintaining compliance with applicable environmental regulations and provided. Twelve filled and appropriately labeled drums were in the 90-day storage area for future transport. One drum was dented and was to be overpacked prior to shipment. No cracks or punctures were associated with the indentation. There was also a labeled and dated 20-yard roll-off container with F034 wastes (excavated soil from replacement of an underground wastewater line adjacent to the closed impoundment) awaiting off-site transport. Due to the nature of the container, it had not been transferred to the 90-day storage area, but remained in the satellite accumulation area, but not subject to any disturbance by plant operations. Review of the facility's Contingency Plan did not expose any deficiencies. Weekly inspections of container storage were well documented. Regulations applicable to drip pad operations were also reviewed.

**Signature:**

*C. Larry Hamil*

**Date:**

12/11/02

cc: Data Integration Division



# Mississippi Department of Environmental Quality Office of Pollution Control

## TSD Facilities

- |   |  |
|---|--|
| <input type="checkbox"/> DCH - Chemical/Physical/Biological   | <input type="checkbox"/> DSI - Surface Impoundments                  |
| <input type="checkbox"/> DCL - Closure/Post-Closure           | <input type="checkbox"/> DTR - Waste Tanks                           |
| <input checked="" type="checkbox"/> DCP - Contingency Plan    | <input type="checkbox"/> DTT - Thermal Treatment                     |
| <input type="checkbox"/> DFR - Financial Responsibility       | <input type="checkbox"/> DWP - Waste Pile                            |
| <input checked="" type="checkbox"/> DGS - General Standards   | <input type="checkbox"/> CAS - C/A Compliance Schedule               |
| <input type="checkbox"/> DGW - Groundwater Monitoring         | <input type="checkbox"/> FEA - Former Enforcement Agreements         |
| <input type="checkbox"/> DIN - Incineration                   | <input type="checkbox"/> CSS - Compliance Schedule Violation         |
| <input type="checkbox"/> DLF - Landfill                       | <input type="checkbox"/> BRR - Differ Stds for Regulation of Residue |
| <input checked="" type="checkbox"/> DLB - Land Ban            | <input type="checkbox"/> BPS - BIF Permit Standards                  |
| <input type="checkbox"/> DLT - Land Treatment                 | <input type="checkbox"/> BIS - BIF Interim Standards                 |
| <input type="checkbox"/> DMC - Container Management           | <input type="checkbox"/> BCE - BIF Stds to Control Emissions         |
| <input checked="" type="checkbox"/> DMR - Manifest            | <input type="checkbox"/> BDT - BIF Stds to Direct Transfer           |
| <input checked="" type="checkbox"/> DOR - Other Requirements  | <input type="checkbox"/> DIA - Incinerator Waste Analysis            |
| <input type="checkbox"/> DOT - Other Requirements (Oversight) | <input type="checkbox"/> DPS - Incinerator Performance Standards     |
| <input type="checkbox"/> DPB - Part B Permit Application      | <input type="checkbox"/> DOP - Incinerator Operating Requirements    |
| <input type="checkbox"/> DPP - Preparedness Prevention        | <input type="checkbox"/> DMI - Incinerator Monitoring and Inspection |

## Generator Facilities

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> GER - All Requirements (Oversight)                    | <input type="checkbox"/> GPT - Pre-Transport            |
| <input checked="" type="checkbox"/> GGR - General Requirements                            | <input checked="" type="checkbox"/> GRR - Recordkeeping |
| <input checked="" type="checkbox"/> GMR - Manifest  | <input type="checkbox"/> GSC - Special Conditions       |
| <input checked="" type="checkbox"/> GLB - Land Ban  | <input type="checkbox"/> GSQ - SQG Requirements         |
| <input checked="" type="checkbox"/> GOR - Waste Min. Program<br>Annual/Biennial HW Report | <input type="checkbox"/> CESQG Requirements             |

## Transporters

- |   |   |
|---|---|
| <input type="checkbox"/> TGR - General Standards  | <input type="checkbox"/> TWD - HW Discharges    |
| <input type="checkbox"/> TMR - Manifest           | <input type="checkbox"/> TRR - All Requirements |
| <input type="checkbox"/> TOR - Other Requirements |   |

**TRONOX**

Name Robert E. Pounds  
Title Project Manager

Phone (405) 775-5601  
Fax (405) 775-6562  
e-mail [robert.pounds@tronox.com](mailto:robert.pounds@tronox.com)

March 13, 2009

Mr. Toby Cook  
Mississippi Department of Environmental Quality  
Office of Pollution Control - Permits  
P.O. Box 2261  
Jackson, MS 39225  
(601) 961-5067

RECEIVED  
MAR 18 2009  
Dept of Environmental Quality  
Office of Pollution Control

Re: ~~Tronox LLC, Columbus~~ – Lowndes County  
HWM Permit MSD 990 866 329  
Temporary Interruption of Groundwater Corrective Action

Dear Mr. Cook,

This serves as a follow up to notification provided by e-mail on March 9, 2009 that Tronox LLC (Tronox) was informed by the City of Columbus on the morning of March 9<sup>th</sup> that the local POTW would be unable to accept waste water discharges from our facility during imminent periods of inspection and maintenance of the City's sewer line. The service outages were scheduled to occur Monday, March 9, 2009, from 12:00 pm until 6:00 pm, and from 7:00 am to 6:00 pm Tuesday, March 10, 2009, Wednesday, March 11, 2009, and possibly Thursday, March 12, 2009. Consequently, Tronox suspended waste water treatment and discharge before 12:00 pm March 9<sup>th</sup>.

On Wednesday, March 11, 2009 Tronox was notified by the contractor performing the inspection and maintenance that the remainder of the work was going to be postponed and that Tronox could resume waste water discharge. As a result Tronox resumed groundwater corrective action activities on the same day.

If Tronox will be required to suspend waste water discharges when the inspection and maintenance work resumes we will again provide notice.

If you have any questions or need any further information please contact Robert Pounds at (405) 775-5601 or by e-mail at [robert.pounds@tronox.com](mailto:robert.pounds@tronox.com).

Sincerely,

*Robert E. Pounds*  
Robert E. Pounds

Tronox. Adding value beyond the product.

Tronox LLC • P.O. Box 268859, Oklahoma City, OK 73126-8859  
3301 N W 150<sup>th</sup> Street, Oklahoma City, OK 73134

cc: Russ Mclean – USEPA  
Deismon Ross - MDEQ  
File



Robert E. Pounds  
Project Manager

#1696  
Lawndale Co.  
RCRA Compliance File Cycles  
EPA ID No. MSD 990 806 329

405-775-5168  
robert.pounds@tronox.com

September 25, 2008

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



Re: Tronox LLC  
Columbus Mississippi Closed Facility  
2008 Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Cook:

Enclosed, please find two copies of the 2008 *Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1,2. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by October 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 775-5168.

Sincerely,

TRONOX LLC

*Robert E. Pounds*

ROBERT E. POUNDS  
Project Manager

RP/twr  
Enclosures

cc: T. Reed

Tronox LLC

One Leadership Square, Suite 300, 211 N. Robinson, Oklahoma City, Oklahoma 73102-7109 • P.O. Box 268859, Oklahoma City,  
Oklahoma 73126-8859

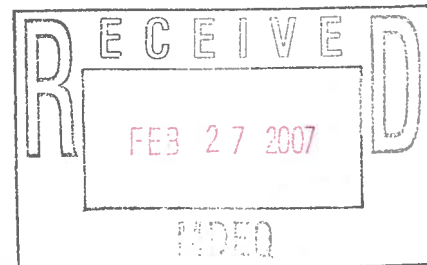


Robert E. Pounds  
Project Manager

Lowndes C.  
#1696  
RCRA Compliance file (yellow)  
GPA \* MSD 990 866 329  
405-775-5168  
robert.pounds@tronox.com

February 27, 2007

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



Re: Tronox LLC  
Columbus Mississippi Closed Facility  
2005 Annual / Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Cook:

Enclosed, please find two copies of the 2006 *Annual / Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1,2. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by March 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 775-5168.

Sincerely,

TRONOX LLC

Robert E. Pounds

ROBERT E. POUNDS  
Project Manager

RP/twr  
Enclosures

cc: T. Reed

Tronox LLC

One Leadership Square, Suite 300, 211 N. Robinson, Oklahoma City, Oklahoma 73102-7109 • P.O. Box 268859, Oklahoma City, Oklahoma 73126-8859



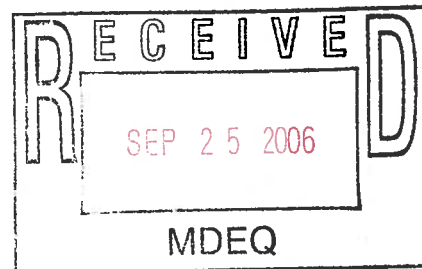
RCRA Compliance File (yellow)  
Lowndes Co. # 1696  
MSD 990 866 329

Steven A. Ladner  
Staff Environmental Specialist

405-775-5129  
steve.ladner@tronox.com

September 22, 2006

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



Re: Tronox LLC  
Columbus Mississippi Closed Facility  
2006 Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Cook:

Enclosed, please find two copies of the 2006 *Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1,2. of the Permit. The Permit requires a semi-annual report on the groundwater monitoring program evaluating the performance of the corrective action to be submitted by October 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 775-5129.

Sincerely,

TRONOX LLC

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/twr  
Enclosures

cc: T. Reed

Tronox LLC

123 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102 • P.O. Box 268859, Oklahoma City, Oklahoma 73126-8857

**TRONOX**

Steven A. Ladner  
Project Manager



405-775-5129  
steve.ladner@tronox.com

February 24, 2006

*Loundas Co.  
RERA Compliance File (Yellow)  
Kerr McGee Columbus  
EPA ID # MSD 990 866 329*

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

Re: Tronox LLC  
Columbus Mississippi Closed Facility  
2005 Annual / Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Cook:

Enclosed, please find two copies of the 2005 *Annual / Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1,2. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by March 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 775-5129.

Sincerely,

TRONOX LLC

*Stephen A. Ladner*  
STEPHEN A. LADNER  
Project Manager

SL/twr  
Enclosures

cc: T. Reed

Tronox LLC

123 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102 • P.O. Box 268859, Oklahoma City, Oklahoma 73126-8857



Compliance File (yellow)

STATE OF MISSISSIPPI  
HALEY BARBOUR  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

October 6, 2005

Mr. Stephen A. Ladner  
Environmental Specialist  
Kerr McGee Chemical Corporation, Columbus  
PO Box 25861  
Oklahoma city, Oklahoma 73125

Dear Mr. Ladner:

Re: Kerr McGee Chemical Corporation,  
Columbus  
2005 Groundwater Report  
Hazardous Waste Ref. No. MSD990866329  
Lowndes County

Based on our review of the referenced report, we are requesting that future reports detail the quantity of free product recovered over time, so that trends in this indicator can be tracked.

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

Sincerely,

A handwritten signature in cursive script that reads "Toby M. Cook".

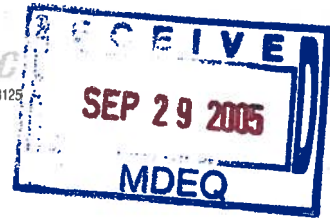
Toby M. Cook, P.E., Chief  
Chemical Manufacturing Branch  
Environmental Permits Division

cc: Russ Mclean, USEPA





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



#1696

September 28, 2005

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

Re: Kerr-McGee Chemical LLC  
Columbus Mississippi Facility  
2005 Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Cook:

Enclosed, please find two copies of the *2005 Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1 of the Permit. The Permit requires a semi-annual report evaluating the performance of the corrective action to be submitted by October 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL LLC

  
STEPHEN A. LADNER  
Staff Environmental Specialist

SL/TWR

Enclosures

cc: T. Reed



**FILE COPY**

**STATE OF MISSISSIPPI**  
HALEY BARBOUR  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**September 15, 2005**

**Mr. Steve Ladner  
Staff Environmental Specialist  
Kerr McGee Chemical Corporation  
PO Box 25861  
Oklahoma City, Oklahoma 73125**

**Dear Mr. Ladner:**

**Re: Inspection Report  
Kerr McGee Chemical Corporation, Columbus  
Columbus, Lowndes County**

**Hazardous Waste-EPA ID**

**MSD990866329**

**Enclosed is a copy of the compliance evaluation inspection report completed as a result of this office's inspection at Kerr McGee Chemical Corporation, Columbus on June 14, 2005. The report should be used by you as a guide for complying with requirements and conditions as stated in the applicable regulations.**

**If you have any questions concerning this matter, please contact me at (601) 961-5123.**

**Sincerely,**

**Larry Hamil  
Timber & Wood Products Branch  
Environmental Compliance & Enforcement Division**

Agency Interest No. 1696  
INS20050003



STATE OF MISSISSIPPI  
HALEY BARBOUR  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOAL, EXECUTIVE DIRECTOR

FILE COPY

June 22, 2005

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

Dear Mr. Ladner:

Re: Inspection Report  
Kerr McGee Chemical Corporation, Columbus  
Columbus, Lowndes County  
Hazardous Waste-TSD MSD990866329  
Hazardous Waste-EPA ID MSD990866329

Enclosed is a copy of the Operation & Maintenance Inspection and Compliance Evaluation Inspection reports completed as a result of this office's inspection at Kerr McGee Chemical Corporation, Columbus, Mississippi facility on 5/10/05. The reports should be used by you as a guide for complying with requirements and limitations stated in your permit.

At the time of the inspection, this facility was found to be in compliance with all pertinent Mississippi Hazardous Waste Management regulations, its RCRA hazardous waste permit, and was adhering to established protocols for sampling ground water monitor wells within the RCRA program.

If you have any questions concerning this matter, please contact me at (601) 961-5220.

Sincerely,

A handwritten signature in black ink that reads "David K. Peacock".

David Peacock  
Technical Support Branch  
Environmental Compliance and Enforcement Division

Agency Interest No. 1696  
INS20050001



FILE COPY

STATE OF MISSISSIPPI  
HALEY BARBOUR  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

June 22, 2005

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

Dear Mr. Ladner:

Re: Inspection Report  
Kerr McGee Chemical Corporation, Columbus  
Columbus, Lowndes County  
Hazardous Waste-TSD MSD990866329  
Hazardous Waste-EPA ID MSD990866329

Enclosed is a copy of the Operation & Maintenance Inspection and Compliance Evaluation Inspection reports completed as a result of this office's inspection at Kerr McGee Chemical Corporation, Columbus, Mississippi facility on 5/10/05. The reports should be used by you as a guide for complying with requirements and limitations stated in your permit.

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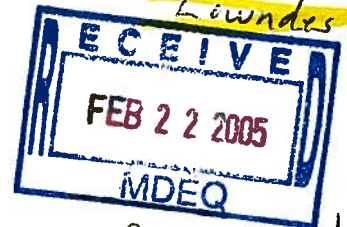
Sincerely,

David Peacock  
Technical Support Branch  
Environmental Compliance and Enforcement Division

Agency Interest No. 1696  
INS20050001



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



February 18, 2005

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

RCRA Compliance F  
# 1696  
# MSD 990866329

Re: **Kerr-McGee Chemical LLC** -Forest Products Division  
**Columbus** Mississippi Closed Facility  
2004 Annual / Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Cook:

Enclosed, please find two copies of the *2004 Annual / Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1,2. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by March 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-MCGEE CHEMICAL LLC  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/twr  
Enclosures

cc: T. Reed



"Ladner, Steve"  
<SLadner@kmg.com>

11/16/2004 06:25 AM

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

Russ and Larry,

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

Steve

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

From: Chuck.Harrell@erm.com [mailto:Chuck.Harrell@erm.com]  
Sent: Thursday, November 11, 2004 7:44 PM  
To: Ladner, Steve  
Cc: Barrett.Cieutat@erm.com; Bock, Nick; Robert.Coffman@erm.com;  
Raj.Vadlamudi@erm.com; Hamilton, John  
Subject: Columbus Project Update - November 11, 2004

Steve,

Field work has been completed. Work completed today included:

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

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

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

Thanks,

Chuck

October 21, 2004

Mr. Joel H. Hudnall, P.E.  
Vice President - North Mississippi Region  
Neel-Schaffer, Inc.  
2310 Martin Luther King, Jr. Drive  
Columbus, Mississippi 39701

RECEIVED  
OCT 26 2004  
Dept. of Environmental Quality  
Office of Pollution Control

Environmental  
Resources  
Management

3838 N. Causeway Blvd.  
Suite 2725  
Metairie, Louisiana 70002  
(504) 831-6700  
(504) 831-6742 (fax)

Subject: Implementation of Interim Measures  
Kerr-McGee Columbus Facility  
2300 14<sup>th</sup> Avenue North  
Columbus, Lowndes County, Mississippi

Dear Mr. Hudnall:

On behalf of Kerr-McGee Chemical LLC (KMC), this correspondence is intended to document verbal communications in which the City of Columbus has expressed no objections to performance of planned interim measures in ditches bordering the above-referenced KMC property. Activities will be conducted in general accordance with the Interim Measures Work Plan (dated August 8, 2001), which was forwarded to your attention on August 30, 2004. Specifically, affected sediments will be excavated from the main drainage ditch located along the south side of 14<sup>th</sup> Avenue North between 22<sup>nd</sup> Street and Martin Luther King, Jr. Drive, and on the eastern and western banks of the BNSF and C&G railroad lines located south of 14<sup>th</sup> Avenue North. To the extent that these activities will warrant temporary access and use of City of Columbus property and/or right-of-ways, this correspondence memorializes your prior approval.

In addition, since performance of this work will involve management of storm water, we have completed a Small Construction Notice of Intent (SCNOI) and developed a Storm Water Pollution Prevention Plan (SWPPP) as required for coverage under Mississippi's Small Construction General Permit. Copies of these documents were e-mailed to your office on September 24, 2004.

We appreciate your time and consideration with this matter and look forward to your continued support through completion of the project. If you need any additional information or any further clarification of our work scope, please feel free to give me a call at (504) 831-6700.

Sincerely,

Environmental Resources Management

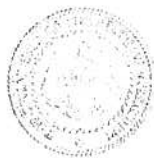


Barrett A. Cieutat, P.G.  
Senior Associate

BAC/pcv

cc: Steve Ladner (Kerr McGee)  
Nick Bock (Kerr McGee)  
Russ McClean (EPA - Region IV)  
Larry Hammil (MDEQ)





FILE COPY

STATE OF MISSISSIPPI  
HALEY BARBOUR  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

September 15, 2004

Mr. Steve Ladner  
Project Manager  
Kerr-McGee Chemical, LLC  
P.O. Box 25861  
Oklahoma City, OK 73125

Dear Mr. Ladner:

Re: Waste Classification  
Off-site Surface Drainage Excavation  
Columbus, MS Site  
EPA ID # MSD 990 866 329

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

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

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

Sincerely,

Larry Hamil  
Environmental Compliance & Enforcement Division

cc: Mr. Russ McClean, EPA-Region IV  
Mr. Toby Cook, MDEQ  
Mr. Jerry Banks, MDEQ





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

July 8, 2004

RECEIVED  
AUG 3 - 2004  
Dept. of Environmental Quality  
Office of Pollution Control

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

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

Re: Waste Classification  
Kerr-McGee Chemical LLC  
Columbus, Mississippi  
EPA ID Number MSD 990 866 329

Dear Mr. Hammil and Mr. McLean:

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

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

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

Mr Larry Hammil and Mr.Russ McLean

July 8, 2004

Page 2

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

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

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

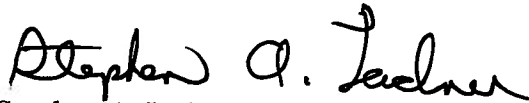
Based on these correspondences, KMC LLC is proposing the same waste classification be applied to the voluntary corrective measures at Columbus, Mississippi. KMC LLC will perform the same methodology of handling excavated materials “as if” they were hazardous, including the use of a hazardous waste hauler,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

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

Thank you for your time and consideration in this matter.

Sincerely,

On behalf of KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION



Stephen A. Ladner  
Project Manager

cc: N. E. Bock, KM Shared Services  
Barrett Cieutat, ERM  
Dickie Allison, KM Shared Services  
T. L. Cubbage, KM Shared Services



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

August 29, 2002

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

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

Dear Mr. Banks:

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

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

Mr. Jerry Banks, P.E.

August 29, 2002

Page 2

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

Sincerely,



A. Keith Watson  
Project Manager

cc: Nick Bock  
William Green  
Glen Pilie' - Adams & Reese  
David Upthegrove - Michael Pisani & Associates



STATE OF MISSISSIPPI  
HALEY BARBOUR  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

July 7, 2004

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

Dear Mr. Ladner:

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

We have reviewed the groundwater investigation work plan dated June 25, and request clarification on the following points:

1. Explain how the groundwater samples will be obtained with the geoprobe- methodology, screen to be used, purging, etc.
2. Will some type of field screening equipment be used, and if so, explain.
3. If any of the initial locations prove to be "hot", what will the lateral spacing be for the next boring?

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

Sincerely,

Toby M. Cook, P.E.  
Environmental Permits Division

cc: Russ McLean

1696 PER20000005



**Ross Williams**

07/01/2004 02:00 PM

To: Toby Cook/EPD/OPC/DEQ@DEQ

cc:

Subject: Kerr-McGee/ Columbus

Toby,

This appears to resemble a typical groundwater field delineation program. However, if I would was asking them questions I would ask them to provide a more detailed explanation for the following items discussed in the letter.

1. Further discussion on how groundwater samples are to be obtained. i.e. sampling methodology, type of screen used, purging of temporary wells etc.
2. Further discussion on what is meant by field determination ( will they utilize some type of field screening equipment) if so, what?
3. If any of the proposed locations north of CMW31 are determined by field methodology to be "hot" Will they investigate further north , and if so at what lateral spacing.

Ross D. Williams, RPG  
MDEQ/OPC/EPD/Mining and Solid Waste Branch  
PO Box 10385  
Jackson, MS 39289-0385

Tele: 601-961-5526  
Fax: 601-354-6612



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

June 25, 2004



Mr. Toby M. Cook, P.E.  
Environmental Permits Division  
Office of Pollution Control  
Mississippi Department of Environmental Quality  
P.O. Box 10385  
Jackson, Mississippi 39289 - 0385

Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Facility  
Proposed Additional Groundwater Assessment: CMW31 – CMW36 Area

Dear Mr. Cook:

In response to your March 26, 2004 correspondence requesting additional groundwater assessment at the Columbus facility, Kerr-McGee Chemical LLC - Forest Products Division (KMCLLC-FPD) proposes an additional groundwater investigation program to address plume boundary questions and potential remedial measures in the vicinity of monitor well CMW31 and CMW36.

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

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



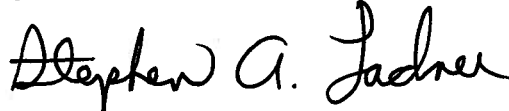
Mr. Toby Cook, P.E.  
June 25, 2004  
Page 2

The results of the groundwater investigation and sampling program will be utilized to determine appropriate additional remedial measures, if warranted, for the impact associated with well CMW31. At the present time, well CMW31 has been included on the list of wells that are pumped on a weekly basis for creosote removal. The product recovery records for CMW31 will be added to well recovery data tables included in the semi-annual reports. In addition, the results of the groundwater assessment program will be included in the next semi-annual report to be submitted on October 1.

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

Sincerely,

KERR-MCGEE CHEMICAL CORP.  
FOREST PRODUCT DIVISION

A handwritten signature in black ink, reading "Stephen A. Ladner". The signature is written in a cursive, flowing style.

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/twr

Attachment

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





- EXISTING MONITOR WELL
  - PROPOSED SOIL BORING LOCATION
  - FREE PRODUCT PLUME
  - DISSOLVED CONSTITUENT PLUME
  - "J" VALUE PLUME
- } GROUNDWATER  
DATA COLLECTED  
MAY 2004

FIGURE 1

PROPOSED SOIL BORING LOCATIONS  
WELL CMW 31 GROUNDWATER INVESTIGATION  
AREA

KMCLLC-FPD COLUMBUS, MS FACILITY



**FILE COPY**

**STATE OF MISSISSIPPI**  
HALEY BARBOUR  
GOVERNOR  
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

June 23, 2004

Mr. Stephen A. Ladner  
Kerr McGee Chemical  
P.O. Box 25861  
Oklahoma City. OK 73128

Dear Mr. Ladner:

Re: **Hazardous Waste Inspection Report**  
**Kerr McGee Chemical Corporation,**  
**Columbus**  
**Hazardous Waste-TSD MSD990866329**  
**Lowndes County, Columbus, MS.**

Enclosed is a copy of the CME and CEI inspection reports completed as a result of this office's inspection at Kerr McGee Chemical Corporation, Columbus on 5/11/04 9:00:00 AM. The reports should be used by you as a guide for complying with requirements and limitations stated in your permit.

As a result of the inspection, it was determined there were no apparent violations of the Hazardous Waste Permit or the Mississippi Hazardous Waste Management Regulations.

If you have any questions concerning this matter, please contact me at 601-961-5308.

Sincerely,

C. Wayne Stover, Jr, P.G.  
Service and Misc. Brach  
Environmental Compliance and Enforcement  
Division

Agency Interest No. 1696  
INS20040001



STATE OF MISSISSIPPI  
GOVERNOR HALEY BARBOUR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

March 26, 2004

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

Dear Mr. Ladner:

Re: Kerr McGee Chemical Corporation, Columbus  
Lowndes County  
Haz. Waste Ref. No. MSD990866329  
Groundwater File (blue label)

We have reviewed the 2003 Corrective Action and Groundwater Monitoring Report received February 27, 2004. Based on the information contained in the report, Kerr McGee should submit a revised Corrective Action Plan to address the contamination in the area of CMW31. This plan should also address determining the extent of the groundwater contamination plume, since the plume remains undefined as to its extent north of monitoring well CMW36.

Please submit the requested plan, including a schedule of implementation, by July 1, 2004. If you have any questions, please contact me at 601-961-5067.

Sincerely,

Toby M. Cook, P.E.  
Environmental Permits Division.

cc: Larry Hammil  
Russ McLean

1696 PER20000005

OFFICE OF POLLUTION CONTROL

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



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

February 26, 2004

Mr. Larry Hammil  
Environmental Permitting  
Office of Pollution Control  
2380 Highway 80 West  
Jackson, Mississippi 39204



Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Closed Facility  
2003 Annual / Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Hammil:

Enclosed, please find two copies of the 2003 *Annual / Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1,2. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by March 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-MCGEE CHEMICAL LLC  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/twr  
Enclosures

cc: T. Reed





Ross Williams

03/24/2004 04:03 PM

To: Toby Cook/EPD/OPC/DEQ@DEQ

cc:

Subject: AI 1696, GW Monitoring Review

Herz. Waste  
I.D. # MSD990866329  
Groundwater  
blue label  
Lowndes Co.

Toby,

Please be advised of the following for the 2003/Annual-Semiannual report for **Kerr McGee -Columbus.**

An area of freephase (DNAPL) as well as dissolved creosote constituents is apparent in the northeastern quadrant of the site as documented by the report. The 4/28 and 11/04-03 sampling events indicate freephase DNAPL associated with monitor well CMW31. Dissolved DNAPL constituents are associated with groundwater at monitor wells CMW27 in the 4/28/03 event and CMW36 in the 11/04/04 event. CMW36 is located within 15 feet of the northern property line according to Figure 4 of the report. There are no additional control wells north of CMW36 to determine the extent of the plume. Any additional wells would require an offsite investigation in an area which may be in a residence. The present apparent size of this isolated DNAPL plume may exceed 75,000 ft.squared. There is no documentation in the report which indicates the thickness of the DNAPL associated with CMW31.

The groundwater being monitored is located in alluvium associated with Luxapallila Creek which is located east of the plant facility approximately 2300 feet. The aquifer is an apparent water table aquifer with flow towards the creek. The alluvium is located unconformably on top of the Eutaw Formation. The contact between the alluvium and the underlying Eutaw formation represents an erosional surface. Typically the top of a water table aquifer will reflect 2 things, the surface topography and any underlying structure at the base of the aquifer. In this case, groundwater elevations in the vicinity of the DNAPL plume indicate the presence of a structural depression that may be associated with an erosional surface at the interface between the creek alluvium and the Eutaw Formation as depicted in Figures 5 and 6 of the report.

Also worthy of mentioning is a comparison between the potentiometric surface maps of the alluvium (water table aquifer) Figures 5 and 6 and the potentiometric surface maps of the 1st monitored aquifer in the underlying Eutaw Formation (Figures 7 and 8). The potentiometric surfaces of both aquifers are remarkably similar which suggests that hydraulic communication may exist between the water table aquifer and the lower aquifer. One well in the Eutaw Formation, CME7, located on the east part of the site and within a defined plume area with free phase, exhibited a "hit" of fluoranthene, 2 ug/l although at present this hit is not quantifiable with the laboratory, we probably need to keep our eye on the lower wells since DNAPL are associated with the site.

Any other concerns please contact me.

Ross D. Williams, RPG  
MDEQ/OPC/EPD/Mining and Solid Waste Branch  
PO Box 10385  
Jackson, MS 39289-0385

Tele: 601-961-5526  
Fax: 601-354-6612





**KERR-McGEE**

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

January 13, 2004

JAN 26 2004

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

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

Dear Mr. Hammill:

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

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

This letter will review the aforementioned topics and our discussions:

### **Plant Closure**

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

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

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

Mr. Larry Hammill  
January 13, 2004  
Page 2

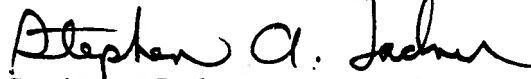
**Wastewater Treatment Plant**

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

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

Sincerely,

KERR-McGEE CHEMICAL LLC  
FOREST PRODUCTS DIVISION

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

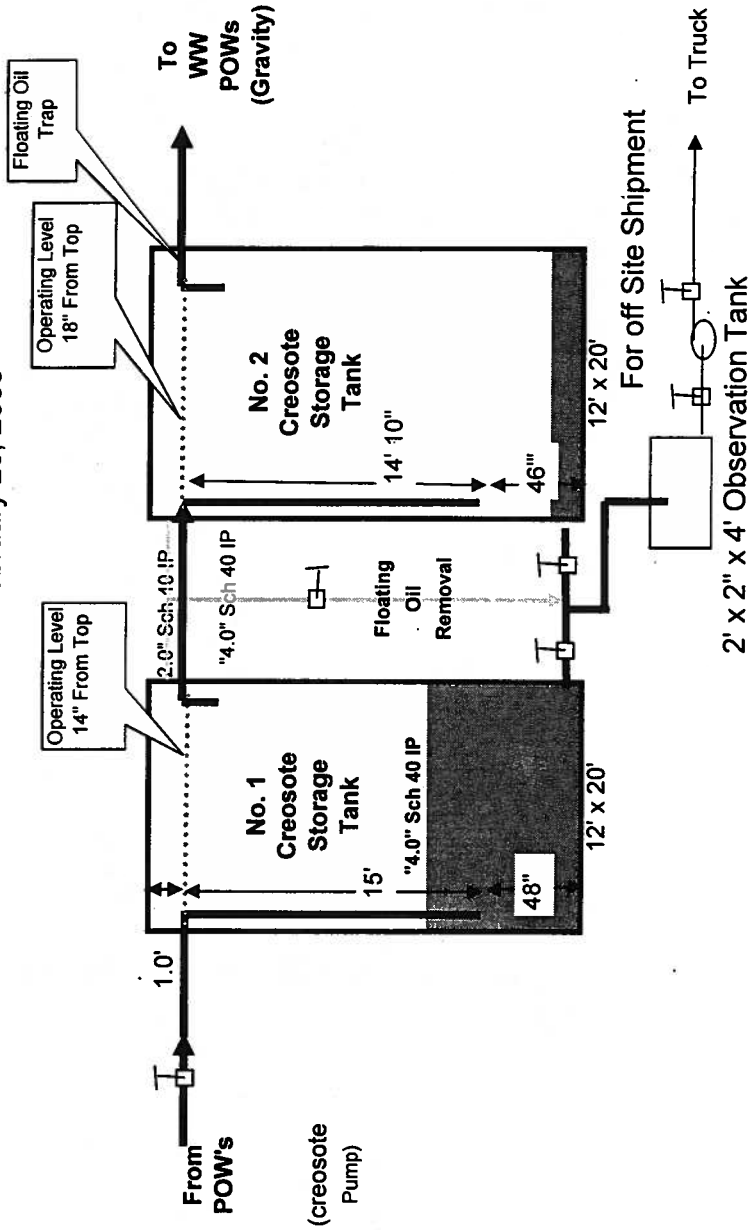
Stephen A. Ladner  
Project Manager

cc: Nick Bock  
T.L. Cabbage

# Creosote Storage Tanks

Columbus, MS

February 20, 2003

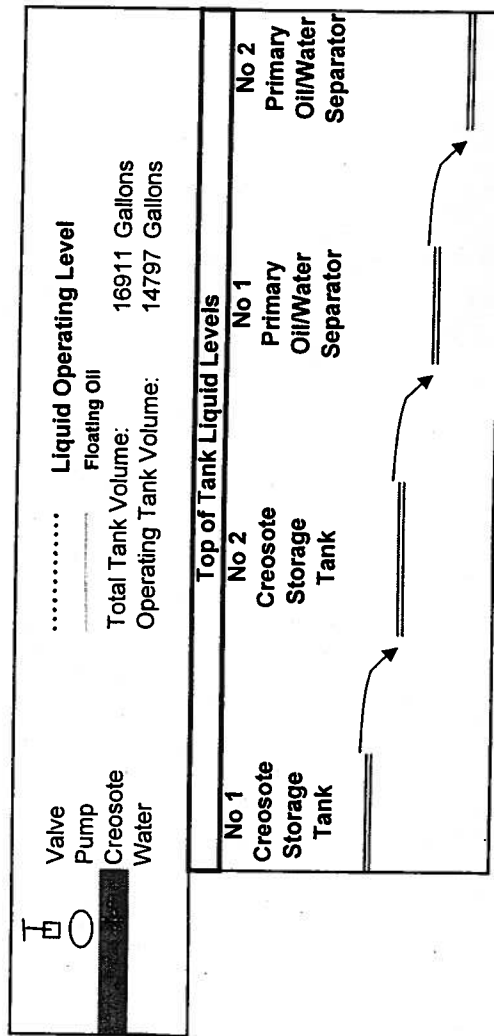


| Valve                     | Pump                  | Creosote                    | Water                       | Liquid Operating Level      | Floating Oil                | Total Tank Volume:          | Operating Tank Volume:      |
|---------------------------|-----------------------|-----------------------------|-----------------------------|-----------------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



**Columbus, MS**  
**February 20, 2003**

**Columbus, MS**  
**February 20, 2003**



# 1696



**KERR-MCGEE CHEMICAL CORPORATION**

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

September 30, 2003

Mr. Louis Crawford, P.E.  
Environmental Engineer  
Office of Pollution Control  
2380 Highway 80 West  
Jackson, Mississippi 39204

Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Facility  
2003 Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01



Dear Mr. Crawford:

Enclosed, please find two copies of the *2003 Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1 of the Permit. The Permit requires a semi-annual report evaluating the performance of the corrective action to be submitted by October 1 of each year.

Please note that a portion of the work completed to date for the groundwater assessment currently in progress at the facility is presented in this report. The remainder of the work, including receipt and review of groundwater monitor well analytical data, will be conveyed to the MDEQ in a future presentation.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-MCGEE CHEMICAL LLC  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/TWR

Enclosures

cc: R. Murphy  
T. Reed





*Compliance*

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

SEP 15 2003



OFFICE OF POLICY,  
ECONOMICS, AND INNOVATION

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

Dear Mr. Ladner:

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

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

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

Sincerely,

Daniel J. Fiorino  
Director, Performance Incentives Division

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

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



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

FILE COPY

February 28, 2003

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

Dear Mr. Ladner:

Re: 2002 Corrective Action Performance  
Evaluation Report  
Kerr-McGee Chemical LLC  
Columbus, Lowndes County RCEA Compliance File  
MSD 990 866 329

Review has been completed of the referenced document. Based on the monitoring results in this report, as well as past reports, it is apparent that there is an area of groundwater contamination in the northeastern portion of the property.

Per our discussions in our meeting February 18, 2003, Kerr-McGee will be developing a modification to the site Corrective Action Plan to address this release and submitting this workplan with a proposed schedule of implementation by April 15, 2003.

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

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

pc: Mr. Russ McLean, EPA Region 4

1696 PER20000005



**KERR-McGEE CHEMICAL CORPORATION**

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

February 26, 2003

Mr. Louis Crawford, P.E.  
Environmental Engineer  
Office of Pollution Control  
2380 Highway 80 West  
Jackson, Mississippi 39204

Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Facility  
2002 Annual / Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Crawford:

Enclosed, please find two copies of the 2002 *Annual / Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1,2. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by March 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL LLC  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/TWR  
Enclosures

cc: R. Murphey  
T. Reed





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

January 15, 2003

FILE COPY

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

Dear Mr. Ladner:

Re: Corrective Action Report  
Second half, 2002  
Kerr-McGee Chemical LLC  
Columbus, Lowndes County  
MSD 990 866 329 RCRA Compliance File

Review has been completed of the referenced document. Based on the monitoring results in this report, as well as past reports, it is apparent that there is an area of groundwater contamination in the northeastern portion of the property, i.e., in the vicinity of CMW31. There is also evidence of contamination near CMW27.

Since it appears that the existing corrective action program is not effectively removing and/or controlling the release at the site, we request that per Permit Condition V.H. Kerr-McGee Chemical develop a modification to the site Corrective Action Plan to address this release. A workplan with a proposed schedule of implementation must be submitted no later than April 15, 2003.

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

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

pc: Mr. Russ McLean, EPA Region 4

<

1696 PER20000005



FILE COPY

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

December 16, 2002

Mr. Ron Murphey  
Plant Manager  
Kerr McGee Chemical Corporation  
2300 14th Avenue North  
Columbus, Mississippi 39701

Dear Mr. Murphey:

Re: Inspection Report  
Kerr McGee Chemical Corporation, Columbus  
Hazardous Waste-EPA ID MSD990866329

Enclosed is a copy of the Compliance Evaluation Inspection report completed as a result of this office's inspection at Kerr McGee Chemical Corporation, Columbus on August 22, 2002. The report should be used by you as a guide for complying with requirements and conditions of applicable hazardous wastes regulations.

If you have any questions concerning this matter, please contact me at 601-961-5123.

Sincerely,

A handwritten signature in cursive script that reads "Larry Hamil".

Larry Hamil  
Timber & Wood Products Branch  
Environmental Compliance and Enforcement Division

Enclosure

Agency Interest No. 1696  
INS20020001





**KERR-McGEE CHEMICAL CORPORATION**

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

#1696  
KERR-McGEE - COLUMBUS  
LOWNDES COUNTY  
RCRA - COMPLIANCE

September 30, 2002

Mr. Louis Crawford, P.E.  
Environmental Engineer  
Office of Pollution Control  
2380 Highway 80 West  
Jackson, Mississippi 39204

DEPT OF ENVIRONMENTAL QUALITY  
REC'D

OCT 02 2002

Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Facility  
2002 Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Crawford:

Enclosed, please find two copies of the *2002 Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1 of the Permit. The Permit requires a semi-annual report evaluating the performance of the corrective action to be submitted by October 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL LLC  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/TWR

Enclosures

cc: R. Murphey  
T. Reed



March 5, 2002

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

FILE COPY

Dear Mr. Ladner:

Re: Corrective Action Effectiveness Report  
Second half, 2001  
Kerr-McGee Chemical LLC  
Columbus, Lowndes County  
MSD 990 866 329

Review has been completed of the referenced document. Based on the monitoring results in this report, as well as past reports, it is apparent that there is an area of groundwater contamination in the northeastern portion of the property, i.e., in the vicinity of CMW31.

Since it appears that the existing corrective action program is not effectively removing and/or controlling the release in this area, we request that per Permit Condition V.H. Kerr-McGee Chemical propose a modification to the site Corrective Action Plan to address this release.

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

Sincerely,



Louis Crawford, P.E.  
Environmental Permits Division

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

d22:RCRA/gw2h00-1



**KERR-McGEE CHEMICAL CORPORATION**

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

February 28, 2002

Mr. Louis Crawford, P.E.  
Environmental Engineer  
Office of Pollution Control  
2380 Highway 80 West  
Jackson, Mississippi 39204

Re: Kerr-McGee Chemical LLC -Forest Products Division  
Columbus Mississippi Facility  
2001 Annual / Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Crawford:

Enclosed, please find two copies of the 2001 *Annual / Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision V.G.1. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by March 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL LLC  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/TWR  
Enclosures

cc: R. Murphey  
T. Reed





STATE OF MISSISSIPPI  
DAVID RONALD MUSGROVE, GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR  
October 25, 2001

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

FILE COPY

Dear Mr. Ladner:

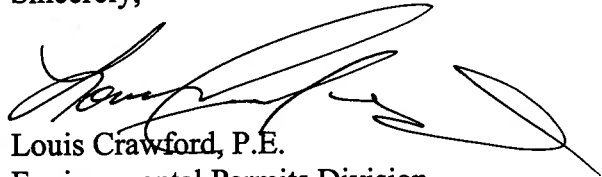
Re: Corrective Action Effectiveness Report  
First Half, 2001  
and  
Supplemental Groundwater Boundary Investigation  
**Kerr-McGee Chemical LLC** *RCRA compliance file (yellow) (Step 4)*  
Columbus, Lowndes County  
**MSD 990 866 329**

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

1. Monitoring Well CMW27 is designated in the permit as an Effectiveness Well, not a Boundary Control Well. Since no required monitoring was missed, there is no need for action at this time.
2. The Supplemental Groundwater Investigation does indicate the potential for contamination in the vicinity of CMW31. We therefore request that sampling of this well and CMW-34 be conducted during the next regularly-scheduled semi-annual monitoring event.

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

Sincerely,

  
Louis Crawford, P.E.  
Environmental Permits Division

pc: Mr. Russ McLean, EPA Region 4 (via e-mail)  
Mr. Larry Hamil, DEQ/OPC/ECED (via e-mail)

d22:RCRA/gw1h01-1



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

**RECEIVED**  
**OCT 10 2001**  
Dept. of Environmental Quality  
Office of Pollution Control

October 1, 2001

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

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

Dear Mr. Crawford:

Enclosed please find one copy of the analytical sampling for the recent groundwater Boundary Well investigation for the Kerr-McGee Chemical LLC facility located in Columbus, Mississippi. A location map, designated as Figure 6, is included for your information. Based on the results of this investigation, KMC LLC believes that the conditions have been satisfied for delineating of the boundary of the groundwater plume. Please review the enclosures and provide your recommendations.

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

Sincerely,

KERR-McGEE CHEMICAL CORP.  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL

Attachment

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



Southwest Laboratory of Oklahoma, Inc.  
Laboratory Results Summary Report  
By Sample Point

Date: 08/23/2001  
Page: 1

Client: KERR MCGEE CHEMICAL CORP.

Project: GWM

| Matrix: WATER                              | GWMCMW32<br>08/01/2001<br>47194.01 | GWMCMW33<br>08/01/2001<br>47194.02 | GWMCMW33<br>08/01/2001<br>47194.02 | GWMCMW34<br>08/01/2001<br>47194.03 | GWMCMW31<br>08/01/2001<br>47194.04 | GWMCMW31<br>08/01/2001<br>47194.04 |
|--|------------------------------------|------------------------------------|------------------------------------|------------------------------------|------------------------------------|------------------------------------|
| Sample Point -><br>Sample Date-><br>LAB#-> |                                    |                                    |                                    |                                    |                                    |                                    |
| Parameters                                 | Units                              |                                    |                                    |                                    |                                    |                                    |
| SEMIVOLATILE ORGANICS ANALYSIS             |                                    |                                    |                                    |                                    |                                    |                                    |
| Carbazole                                  | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 62                                 | 60 J                               |
| Phenol                                     | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 U                               | 100 U                              |
| 2-Chlorophenol                             | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 U                               | 100 U                              |
| 2,4-Dimethylphenol                         | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 U                               | 100 U                              |
| Naphthalene                                | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 610 E                              | 750                                |
| 4-Chloro-3-methylphenol                    | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 U                               | 100 U                              |
| 2,4,6-Trichlorophenol                      | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 U                               | 100 U                              |
| Acenaphthylene                             | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 4 J                                | 100 U                              |
| 2,4-Dinitrophenol                          | ug/L                               | 25 U                               | 26 U                               | 25 U                               | 25 U                               | 250 U                              |
| 2,3,4,6-Tetrachlorophenol                  | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 U                               | 100 U                              |
| Phenanthrene                               | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 240 E                              | 300                                |
| Fluoranthene                               | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 73                                 | 74 J                               |
| Pentachlorophenol                          | ug/L                               | 25 U                               | 26 U                               | 25 U                               | 25 U                               | 250 U                              |
| Benzo(a)anthracene                         | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 J                               | 100 U                              |
| Benzo(b)fluoranthene                       | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 3 J                                | 100 U                              |
| Benzo(a)pyrene                             | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 3 J                                | 100 U                              |
| Indeno(1,2,3-cd)pyrene                     | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 U                               | 100 U                              |
| Dibenz(a,h)anthracene                      | ug/L                               | 10 U                               | 10 U                               | 10 U                               | 10 U                               | 100 U                              |



U: ANALYZED BUT NOT DETECTED  
See enclosure for additional qualifiers  
LMW1.0NNYNNN



BNA, Inc.

# Environment

REPORTER

Volume 32 Number 12  
Friday, March 23, 2001  
ISSN 1521-9410

Page 537

## News

### Waste Management

#### Toxic Substances

#### Neighbors of Wood Treatment Facility

#### Sue Over Personal Injury, Property Damage

Mississippi residents filed a putative class action against chemical manufacturer Kerr-McGee Corp. on March 7, claiming creosote and other hazardous chemicals released from a wood treatment facility caused personal injuries and property damage (*Conner v. Kerr-McGee Corp.*, N.D. Miss., No. 1:01 CV77-DA, 3/7/01).

The complaint in the U.S. District Court for the Northern District of Mississippi seeks certification of personal injury, medical monitoring, and property damage classes. Plaintiffs contend the facility in Columbus, Miss., which treats about 40 percent of the railroad ties in the country, caused air, soil, and ground water contamination.

"The contamination from operations at Kerr-McGee occurs at numerous points during the wood treatment process. Drips, spills, leaks, accidents, air emissions and waste disposal practices throughout the years and continuing into the present have led to widespread contamination of the plant site and neighboring community," plaintiffs' attorney Hunter Lundy said in a statement. Lundy is with Lundy & Davis in Lake Charles, La.

The plaintiffs seek certification of all classes under Federal Rule of Civil Procedure 23(b)(3), and additional certification of the medical monitoring class under Fed. R. Civ. P. 23(b)(2).

Kerr-McGee Spokeswoman Debbie Schramm said in a statement, "We are confident that our operations have not harmed anyone, and we believe that the facts will speak for themselves as we vigorously defend the lawsuit." She added, "Our Columbus facility has been nationally recognized by the [Environmental Protection Agency] and the [Occupational Health and Safety Administration] for its environmental responsibility and safe operations."


#### Open Since 1928

The wood treatment plant, which has been in operation since 1928, was acquired by Kerr-McGee in 1964. Plaintiffs claim Kerr-McGee treated railroad ties, switch ties, crossings, and pilings with creosote and other chemicals. Although Kerr-McGee discontinued the use of pentachlorophenol in 1978, it continues to treat wood with creosote, plaintiffs alleged.

Plaintiffs claimed pentachlorophenol and creosote tank cars were improperly unloaded from the bottom, causing chemicals to spill onto the ground and eventually into ground water near the loading dock area. An unlined impoundment, used to contain hazardous wood treatment waste, resulted in ground water contamination, the plaintiffs alleged.

Plaintiffs added that a 1974 fire destroyed a large number of storage tanks, causing a major spill.

According to the complaint, toxic releases also generated elevated atmospheric concentrations of chemical vapors, particulates, and aerosols in the surrounding area.

The plaintiffs alleged the main sources of air contamination within the wood treatment facility include toxic vapors released from treated ties and poles stored at the facility, toxic vapors discharged during cylinder charges, high metal concentrations released from sludge drying beds, and vapors from waste-liquid impoundments containing creosote constituents and other chemicals. 

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Tuesday, May 8, 2001

## Columbus pollution case moved to federal court

THE ASSOCIATED PRESS

COLUMBUS, Miss. -A church's lawsuit alleging a Kerr-McGee forest products plant in Columbus has contaminated surrounding property apparently has bounded to federal court.

Attorneys for Maranatha Faith Center said they learned late last week that Kerr-McGee had moved to have the case removed from state court.

The decision apparently stemmed from wording in filings by the church that if contamination is proven, the area would be declared a federal Superfund site.

Maranatha contends the plant on 14th Avenue North discharges pollutants into drainage ditches extending through nearby church property.

Maranatha had argued the case should remain in Hinds County because the state's pollution watchdog agency, the state Department of Environmental Quality, is headquartered in the capital city.

The more than 70-year-old plant, owned by Kerr-McGee since a 1964 purchase from Moss-American, uses the wood preservative creosote to prepare timber for use as railroad crossties.

The lawsuit had been in Hinds County Chancery Court, with well-known attorney Johnnie Cochran as one of the lawyers representing Maranatha.

A Hinds County chancery judge last month agreed with an argument by Kerr-McGee that the dispute should be heard in Lowndes County, where the alleged pollution occurred.

Attorney Orlando Richmond of West Point, representing the church, said a hearing had been scheduled for Monday before a chancery judge dealing with Maranatha's attempt to prevent foreclosure on the church by trustees of a bonding company.

Richmond said that a proposed expansion of the church was financed by bonds but that the payments are in a past due status.

He said the expansion has been on hold pending the outcome of the legal dispute over alleged contamination of the area in the vicinity of the plant.

Richmond said that the basis for the shift to federal court was that Maranatha, in making the motion for an injunction in the foreclosure case, had also asked that the location be declared a Superfund site if contamination is found.

...ous pollution case moved to federal court

Congress established the Superfund program in 1980 to locate, investigate and clean up the worst polluted sites nationwide.

The Environmental Protection Agency administers the Superfund program in cooperation with individual states and tribal governments.

Gordon Flowers, a local attorney representing Kerr-McGee, said there was nothing unusual about the request to move the case to federal jurisdiction.

"We look at it as simply having it in the right court based on the relief the plaintiffs recently requested," Flowers said of the Superfund issue.

Asked whether Maranatha has a smoking gun based on scientific study to show pollution has occurred, Flowers said, "We don't think so and we think when the case is actually presented in court that will be very clear."

The federal docket in Aberdeen identifies the defendants in the Maranatha case as Kerr-McGee Corp., Kerr-McGee Chemical, Moss-American, T.J. Moss Tie Co., American Creosoting, the state Department of Environmental Quality, Sanderson Plumbing Products Inc. and Columbus Cemetery and Investments Co.

The suit also lists as defendants unnamed persons who approved of the practices that allegedly caused contamination of the church property.



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

March 2, 2001

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

FILE COPY

Dear Mr. Ladner:

Re: Corrective Action Effectiveness Report  
Second half, 2000  
Kerr-McGee Chemical LLC  
Columbus, Lowndes County  
MSD 990 866 329

Review has been completed of the referenced document and we have the following comment:

We still have some concerns regarding the contamination at Monitoring Well CME29. We recommend that investigatory work be performed to determine if this is indeed a separate small plume as indicated on Figures 2 and 3 or if it is a continuation of the main plume. Also, it will be necessary to verify that the contamination is not migrating off-site to the north and/or east of the plant site.

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

Sincerely,

Louis Crawford, P.E.  
Environmental Permits Division

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

d22:RCRA/gw2h00-1



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



February 27, 2001

Mr. Bruce Ferguson  
Office of Pollution Control  
2380 Highway 80 West  
Jackson, Mississippi 39204

Re: Kerr-McGee Chemical Corporation -Forest Products Division  
Columbus Mississippi Facility  
2000 Annual / Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
HW-90-329-01

Dear Mr. Ferguson:

Enclosed, please find two copies of the *2000 Annual / Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision IV.H.11. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by March 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-McGEE CHEMICAL CORP.  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/TWR

Enclosures

cc: R. Murphey  
T. Reed



Concise



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



February 27, 2001

Mr. Bruce Ferguson  
Office of Pollution Control  
2380 Highway 80 West  
Jackson, Mississippi 39204

Re: Kerr-McGee Chemical Corporation -Forest Products Division  
Columbus Mississippi Facility  
2000 Annual / Semi-Annual Corrective Action Performance  
Evaluation Report and Groundwater Monitoring Report  
**HW-90-329-01**

Dear Mr. Ferguson:

Enclosed, please find two copies of the 2000 *Annual / Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report* submitted in compliance with 40 CFR Section 265.94, and as referenced in provision IV.H.11. of the Permit. The Permit requires an annual report on the groundwater monitoring program, and a semi-annual report evaluating the performance of the corrective action to be submitted by March 1 of each year.

If you have any questions or require additional information concerning the contents of this report, please do not hesitate to contact me at (405) 270-2625.

Sincerely,

KERR-MCGEE CHEMICAL CORP.  
FOREST PRODUCT DIVISION

STEPHEN A. LADNER  
Staff Environmental Specialist

SL/TWR

Enclosures

cc: R. Murphey  
T. Reed





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

January 22, 2001

Morris Amous  
2247 Ridge Road  
Columbus, MS 39701

FILE COPY

Dear Mr. Amous:

Re: Kerr-McGee Chemical Corporation  
Columbus, MS  
Lowndes County

I am responding to your complaint concerning contamination in ditches that drain from this site.

Attached is a report describing our investigation conducted on July 1, 1999. I apologize for the delay in getting this report to you. The report contains information on locations sampled by our staff and contaminant concentrations found and cleanup standards used as guidance by this agency. It may not be readily apparent how to interpret this information. If you have questions on these results, feel free to contact me.

After the contamination was identified in the ditches, it was apparent that further investigation would be necessary to determine the extent of the contamination and whether removal would be necessary. This agency deferred this decision to EPA's Atlanta office because we do not presently have the authority under the hazardous waste regulations to require Kerr-McGee to conduct this investigation. EPA has issued Kerr-McGee a post-closure hazardous waste permit that dictates certain requirements for the continued cleanup of contamination from the closed surface impoundment. Under the authority of this permit, EPA can require the company to investigate past releases from the impoundment or other units on the plant property. EPA is currently working with Kerr-McGee to further investigate the drainage ditches leaving the plant site. A decision on any potential cleanup will be made after Kerr-McGee completes additional sampling studies on the ditches.

If you wish to contact EPA, the current contact for this project is Russ McLean at 404.562.8504.  
If you wish to contact me, my phone number is 601.961.5377.

Sincerely

A handwritten signature in cursive script, appearing to read "David Lee".

David E. Lee, P.E., Chief  
Timber Branch, Compliance Division

cc: Don Watts  
Larry Hamil

# Memo

**To:** File  
**From:** Bruce Ferguson, Russ Twitty, Wayne Stover, and Kevin Posey  
**CC:** Kirk Shelton  
**Date:** 8/25/99  
**Re:** Maranatha Sampling Event

---

## **Background**

The Maranatha Faith Center is located on Waterworks Road in Columbus, Mississippi. The Center was undergoing construction activities replacing an old existing riveted metal culvert with a new concrete box culvert when apparent contamination was found in the sediments that had accumulated in the existing culvert. Kerr-McGee Chemical Corporation, which is located nearby, collected the sediments in roll-off boxes and moved them to the Kerr-McGee facility. In response to complaints by the Maranatha Faith Center, the North Regional Office visited the site (see memo dated May 27, 1999). Additionally, Richard Harrell and Bruce Ferguson of the MDEQ collected samples from the roll-off boxes and the removed culvert. (See memo dated June 4, 1999). On July 1, 1999, the Site Sampling Team of the Mississippi Office of Pollution Control collected sediment samples from the ditch that passes the Maranatha Faith Center.

## **Site Description**

The Maranatha Faith Center is located in North Columbus. The area is a mixture of residences and commercial operations. The ditch running through the Maranatha Faith Center property can be seen in Figure 1. Based on subjective site observations, the majority of the flow on the day of the sampling event originated from a contributing ditch flowing south to the northern property boundary of the Kerr-McGee facility. While the origins of this ditch were not traced, the area surrounding the ditch appeared to be residential. At the Kerr-McGee property boundary, the flow traveled east along 14<sup>th</sup> Avenue to the railroad tracks. The flow then moved south along the western side of the railroad tracks for about 200 feet where it passed under two sets of railroad tracks and then turned south along the east side of the tracks. Approximately midway between 14<sup>th</sup> Avenue and Marvin Street another ditch contributes to the flow. This ditch originates at the NPDES discharge for Sanderson Plumbing. The flow continues south approximately 150 feet before reaching Waterworks Road where another ditch contributes to the flow. This ditch originates at the southwestern portion of the Kerr-McGee facility. This ditch flows across the Sanderson Plumbing property into a culvert that is approximately 500 feet long. Prior to entering the ditch that flows past the Maranatha Faith Center, this ditch receives a discharge from an ice plant. The flow that passes the Maranatha Faith Center eventually discharges into Luxipallila Creek.



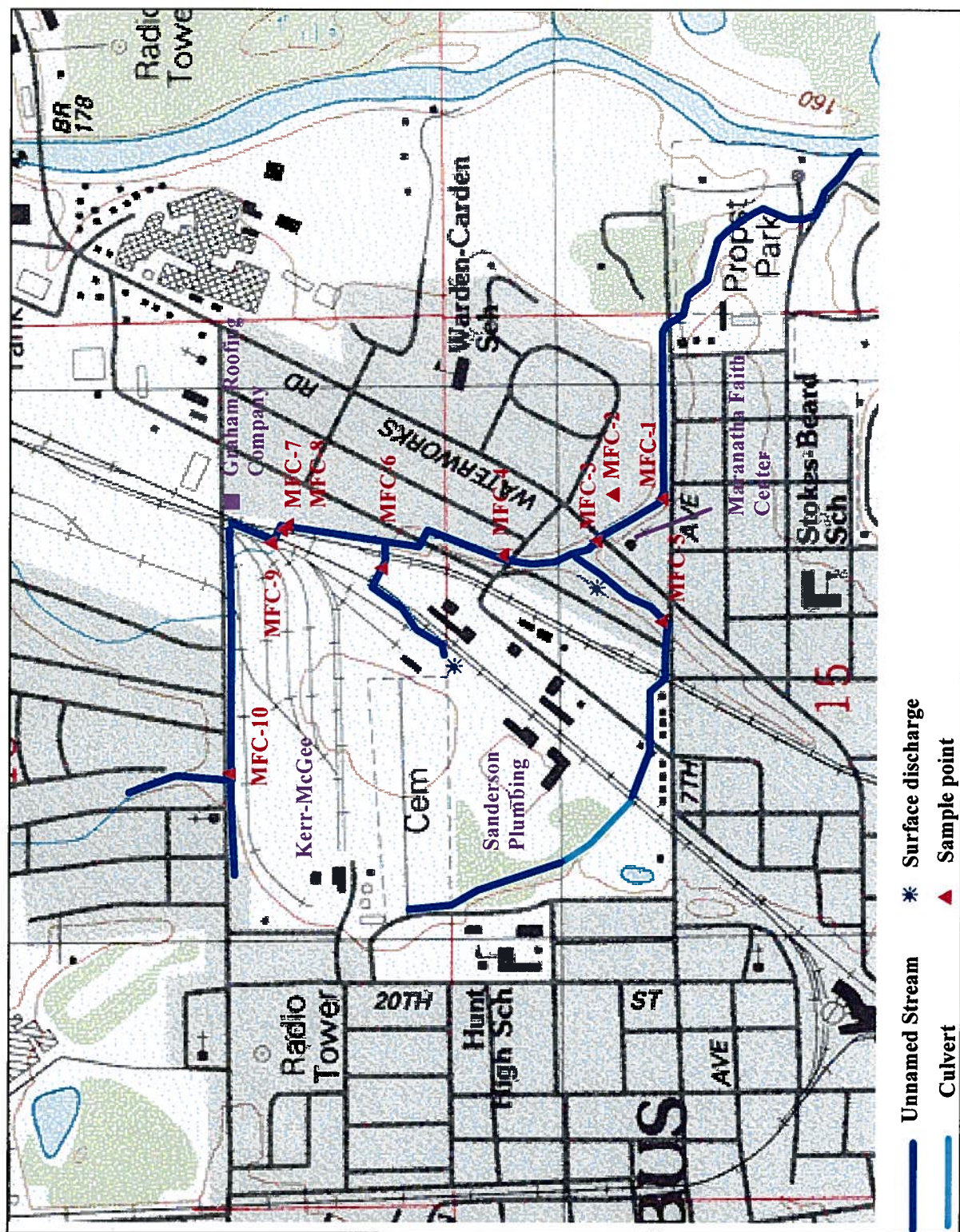


Figure 1 –Sample Locations



## Sampling

Nine sediment samples were taken from the ditches in the area and one sample was taken from the coating of the removed culvert. The sediment samples were collected with 6" stainless steel auger buckets and transferred to a pyrex dish where the sample was homogenized. Two buckets from each sample location were homogenized to produce the final sample with the exception of MFC-1. The sample was homogenized by quartering the sample dish, each quarter was thoroughly mixed, and then the four quarters were mixed using a stainless steel mixing spoon. The samples were then transferred to pre-cleaned glass sample containers with teflon lined lids. Chuck Swann with Kerr-McGee was provided with splits of the samples in jars supplied by Kerr-McGee.

Figure 2 shows the sample location for MFC-1. The view in the photograph is facing west with 7<sup>th</sup> Avenue in the background. MFC-1 was collected from the ditch at the intersection of N 7<sup>th</sup> Avenue and N 26<sup>th</sup> Street. An open sided auger bucket was used at this location. On the day of the sampling, there was a substantial flow in the ditch. The sediments at this location were not cohesive and the velocity of the water flow prevented the use of the full length of the auger bucket. At this location the auger was advanced until the sediments reached the opening in the side of the auger. Four partial buckets were collected to produce the final sample. While being mixed, the sample emitted a strong hydrocarbon odor.



**Figure 2 - MFC-1.**



**Figure 3 - MFC-2.**

The removed culverts can be seen in Figure 3. The culverts were riveted metal that appeared to have a bituminous coating. A sample of this coating was collected by scraping the culvert with a stainless steel mixing spoon. The Maranatha Faith Center can be seen in the background of the photograph. The view of the photograph is facing southwest with Waterworks road on the right side of the photograph.



**Figure 4 - MFC-3.**



**Figure 5 - MFC-4.**



**Figure 6 - MFC-5.**

Sample MFC-3 was collected upstream of the Maranatha Faith Center on the west side of Waterworks road. The view of the photograph is northeast. Sample MFC-4 was collected at the intersection of Marvin Street and Moss Street. The view of the photograph is to the south with Marvin Street in the background. Sample MFC-5 was collected on the north side of 7<sup>th</sup> Avenue approximately midway between n Moss Street and Waterworks Road. The view of the photograph is west with N 7<sup>th</sup> Avenue in the background. The portion of the ditch from this point until the convergence with the ditch that passes the Maranatha Faith Center is concrete paved. The sample at this location was collected outside the concrete pavement.





Sample MFC-6 was collected on the upstream side of the culvert that passes under the eastern most railroad track adjacent to Moss Street. This ditch flows from the Sanderson Plumbing discharge and converges on the west side of Moss Street with the ditch that passes the Maranatha Faith Church. The view of the photograph is facing north. Sample MFC-7 was collected in the ditch south of 14<sup>th</sup> Avenue behind the former Graham Roofing site east of the railroad tracks. Sample MFC-8 was also collected at this location. The view of the photograph is north.



**Figure 9 - MFC-8.**



**Figure 10 - MFC-9.**



**Figure 10 - MFC-10.**

Samples MFC-7 and MFC-8 were collected in the same vicinity. Adjacent to the Graham Roofing property the ditch contained a hard substance in the bottom. Figure 9 shows the material that was removed with the auger bucket. An entire bucket of the material was removed without breaking through, therefore the material was greater than six inches thick. Sample MFC-9 was collected south of 14<sup>th</sup> Avenue between the railroad tracks and the Kerr-McGee property. The view of the photograph is facing west. Sample MFC-10 was taken in the ditch that runs along 14<sup>th</sup> Avenue adjacent to the Kerr-McGee property line. The view in the photograph is facing southwest.

### **Sampling Results**

The samples collected were analyzed for semi-volatiles at the Office of Pollution Control Laboratory. Results of the analysis that were above detection levels are summarized in Table 1. No semi-volatile constituents were detected in sample MFC-2, the culvert coating, or MFC-8, the material in the ditch behind Graham Roofing.

Table 2 summarizes the maximum detected concentration with hazardous waste screening levels. Some of the concentrations for

Considering Migration" column represents a level in the soil that will achieve the corresponding generic screening level when transported to the respective media using the methodology of the "Soil Screening Guidance: Technical background Document," EPA/540/R-95/128, May 1996. The saturation column under this heading represents a concentration in the soil above which free product contamination would exist. The surface water screening levels represent screening values presented for hazardous waste sites in Office of Technical Services Supplemental Guidance to RAGS: Region 4 Bulletins, October, 1995.

**Table 1 – Sampling Results Above Detection Limit in PPM**

| Constituent                | MFC-1 | MFC-3 | MFC-4 | MFC-5 | MFC-6 | MFC-7 | MFC-9 | MFC-10 |
|----------------------------|-------|-------|-------|-------|-------|-------|-------|--------|
| 1,4-dimethylnaphthalene    |       |       |       |       |       |       |       | 9.33   |
| 1-ethylnaphthalene         |       |       |       |       |       |       |       | 9.56   |
| 1-methylnaphthalene        |       |       |       |       |       |       |       | 9.84   |
| 2,3-dimethylnaphthalene    |       |       |       |       |       |       |       | 20.1   |
| 2,6-dimethylnaphthalene    |       |       |       |       |       |       |       | 20.6   |
| 2-methylnaphthalene        |       |       |       |       |       |       |       | 57.6   |
| 4-methyldibenzofuran       |       |       |       |       |       |       |       | 9.93   |
| 4-methylphenol             |       |       |       | 0.33  |       |       |       |        |
| acenaphthene               | 28.5  | 0.33  |       |       | 0.33  |       | 4.74  | 184    |
| acenaphthylene             | 0.33  | 0.33  | 0.33  |       | 0.33  | 0.33  |       | 6.4    |
| anthracene                 |       | 0.33  | 0.33  |       | 0.33  | 0.33  | 3.32  | 21.5   |
| benzo(a)anthracene         | 38.7  | 3.48  | 3.68  |       | 22.4  | 4.16  | 3.33  | 39     |
| benzo(a)fluorene           |       |       |       |       |       |       |       | 6.56   |
| benzo(a)pyrene             | 15.3  | 0.33  | 0.33  |       | 19.9  | 7.93  | 0.33  | 14.8   |
| benzo(b)fluoranthene       | 24.9  |       | 5.93  |       | 0.33  | 13.9  | 0.33  | 24.2   |
| benzo(g,h,i)perylene       | 5.12  | 0.33  | 0.33  |       | 0.33  | 3.9   |       | 0.33   |
| benzo(k)fluoranthene       | 7.56  | 4.14  | 0.33  |       | 0.33  | 4.09  | 0.33  | 8.13   |
| biphenyl                   |       |       |       |       |       |       |       | 24.6   |
| bis(2-ethylhexyl)phthalate |       |       | 0.33  |       |       |       |       |        |
| carbazole                  | 0.33  |       |       |       | 0.33  |       |       | 29     |
| chrysene                   | 31.9  | 3.7   | 5.55  |       | 19.4  | 5.46  | 0.33  | 28.3   |
| di-n-octylphthalate        |       |       |       | 8.11  |       |       |       |        |
| dibenz(a,h)anthracene      | 0.33  |       |       |       |       |       |       |        |
| dibenzofuran               | 24.8  | 0.33  |       |       | 0.33  |       | 4.2   | 118    |
| fluoranthene               | 95.1  | 10    | 7.2   |       | 56.9  | 4.12  | 14.6  | 152    |
| fluorene                   | 49    | 0.33  |       |       | 0.33  |       | 6.12  | 150    |
| indane                     |       |       |       |       |       |       |       |        |
| indene                     |       |       |       |       |       |       |       |        |
| indeno(1,2,3-cd)pyrene     | 6.76  | 0.33  | 0.33  |       | 0.33  | 3.8   |       | 0.33   |
| Naphthalene                | 0.33  | 0.33  |       |       |       | 0.33  |       | 29.7   |
| "                          |       |       |       |       |       |       |       |        |

**Table 2 – Maximum Level Detected with Generic Screening Levels**

| Parameter                 | Maximum Concentration ppm | Generic Screening Levels |              | Levels Considering Migration |                |              |                  | Surface Water Screening Levels |                 |                |
|---------------------------|---------------------------|--------------------------|--------------|------------------------------|----------------|--------------|------------------|--------------------------------|-----------------|----------------|
|                           |                           | Soil mg/kg               | Water mg/l   | Air ug/m <sup>3</sup>        | To Water mg/kg | To Air mg/kg | Saturation mg/kg | Fresh Water ug/l               | Salt Water ug/l | Sediment mg/kg |
| Acenaphthene              | 2.85E+01                  | 4.80E+03 N               | 2.10E+00 N   | 2.10E+02 N                   | 4.20E+02       | 4.00E+04     | 4.24E+01         | 1.70E+01                       | 9.70E+00        | 3.30E-01       |
| Acenaphthene              | 1.84E+02                  | 4.80E+03 N               | 2.10E+00 N   | 2.10E+02 N                   | 4.20E+02       | 4.00E+04     | 4.24E+01         | 1.70E+01                       | 9.70E+00        | 3.30E-01       |
| Anthracene                | 2.15E+01                  | 2.40E+04 N               | 1.05E+01 N   | 1.05E+03 N                   | 8.44E+03       | 7.08E+05     | 1.74E+00         |                                |                 | 3.30E-01       |
| Benz[a]pyrene             | 1.99E+01                  | 9.59E-02 C               | 2.00E-04 MCL | 1.13E-03 C                   | 7.13E+00       | 6.27E+01     | 2.89E+00         |                                |                 | 3.30E-01       |
| Benz[b]fluoranthene       | 2.49E+01                  | 9.59E-01 C               | 4.79E-06 C   | 1.13E-02 C                   | 1.54E-01       | 1.03E+02     | 2.41E+00         |                                |                 |                |
| Benz[g,h,i]perylene       | 5.12E+00                  |                          |              |                              |                |              |                  |                                |                 |                |
| Benz[k]fluoranthene       | 8.13E+00                  | 9.59E+00 C               | 4.79E-05 C   | 1.13E-01 C                   | 1.51E+00       | 8.60E+03     | 1.26E+00         |                                |                 |                |
| Benz[a]anthracene         | 3.90E+01                  | 9.59E-01 C               | 4.79E-06 C   | 1.13E-02 C                   | 6.87E-02       | 2.46E+02     | 6.73E+00         |                                |                 | 3.30E-01       |
| 1,1-Biphenyl              | 2.46E+01                  | 4.00E+03 N               | 1.75E+00 N   | 1.75E+02 N                   | 1.40E+02       |              | 5.61E+01         |                                |                 |                |
| Chrysene                  | 3.19E+01                  | 9.59E+01 C               | 4.79E-04 C   | 1.13E+00 C                   | 5.05E+00       | 6.10E+03     | 8.42E-01         |                                |                 | 3.30E-01       |
| Dibenzofuran              | 2.48E+01                  | 3.20E+02 N               | 1.40E-01 N   | 1.40E+01 N                   | 6.40E+01       |              | 2.29E+02         |                                |                 |                |
| Dibenzofuran              | 1.18E+02                  | 3.20E+02 N               | 1.40E-01 N   | 1.40E+01 N                   | 6.40E+01       |              | 2.29E+02         |                                |                 |                |
| Dibenz[a,h]anthracene     | 3.30E-01                  | 9.59E-02 C               | 2.00E-04 MCL | 1.13E-03 C                   | 1.43E+01       | 1.94E+02     | 8.91E+00         |                                |                 | 3.30E-01       |
| Di(2-ethylhexyl)phthalate | 3.30E-01                  | 5.00E+01 C               | 6.00E-03 MCL | 2.50E-01 C                   | 2.67E+01       | 1.11E+04     | 7.55E+01         | 3.00E-01                       |                 | 1.82E-01       |
| Fluoranthene              | 9.51E+01                  | 3.20E+03 N               | 1.40E+00 N   | 1.40E+02 N                   | 2.34E+03       | 2.80E+05     | 1.72E+01         | 3.98E+01                       | 1.60E+00        | 3.30E-01       |
| Fluoranthene              | 1.52E+02                  | 3.20E+03 N               | 1.40E+00 N   | 1.40E+02 N                   | 2.34E+03       | 2.80E+05     | 1.72E+01         | 3.98E+01                       | 1.60E+00        | 3.30E-01       |
| Fluorene                  | 4.90E+01                  | 3.20E+03 N               | 1.40E+00 N   | 1.40E+02 N                   | 4.02E+02       | 5.37E+04     | 2.84E+01         |                                |                 | 3.30E-01       |
| Fluorene                  | 1.50E+02                  | 3.20E+03 N               | 1.40E+00 N   | 1.40E+02 N                   | 4.02E+02       | 5.37E+04     | 2.84E+01         |                                |                 | 3.30E-01       |
| Indeno[1,2,3-cd]pyrene    | 6.76E+00                  | 9.59E-01 C               | 4.79E-06 C   | 1.13E-02 C                   | 4.56E-01       | 1.29E+03     | 1.05E-01         |                                |                 |                |
| 4-Methylphenol            | 3.30E-01                  | 4.00E+02 N               | 1.75E-01 N   | 1.75E+01 N                   | 3.74E+00       |              | 2.56E+04         |                                |                 | 3.30E-01       |
| Phenanthrene              | 6.75E+01                  |                          |              |                              |                |              |                  |                                |                 | 3.30E-01       |
| Phenanthrene              | 1.85E+02                  |                          |              |                              |                |              |                  |                                |                 | 3.30E-01       |
| Pyrene                    | 1.13E+02                  | 2.40E+03 N               | 1.05E+00 N   | 1.05E+02 N                   | 3.34E+03       | 3.63E+05     | 2.15E+01         |                                |                 | 3.30E-01       |
| Pyrene                    | 1.66E+02                  | 2.40E+03 N               | 1.05E+00 N   | 1.05E+02 N                   | 3.34E+03       | 3.63E+05     | 2.15E+01         |                                |                 | 3.30E-01       |
| 2-methylnaphthalene       | 5.76E+01                  | 3.20E+03 N               | 1.40E+00 N   |                              |                |              |                  |                                |                 | 3.30E-01       |
| 1-methylnaphthalene       | 9.84E+00                  | 5.60E+03 N               | 2.45E+00 N   |                              |                |              |                  |                                |                 | 3.30E-01       |

N – Screening Level based on non-carcinogenic effects

C – Screening Level based on carcinogenic effects

MCL – Maximum Contaminant Level



## **Decontamination Procedures**

During the sampling event field sampling equipment was decontaminated by:

1. cleaning with tap water and phosphate free detergent using a brush if necessary to remove particulate matter and surface films,
2. rinsing thoroughly with tap water,
3. rinsing thoroughly with de-ionized water,
4. rinsing thoroughly with isopropyl alcohol,
5. allowing the equipment to air dry, and
6. wrapping the equipment with aluminum foil.