Ground Water Monitoring Report
Calendar Year 2008 Event

Former Gulf States Creosoting Site
Hattiesburg, Mississippi

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Executive Summary

From 1996 though 2001, Tronox LLC's predecessor, Kerr-McGee Chemical, LLC (KMC LLC), completed a Remedial Investigation (RI) at the former Gulf States Creosoting site in Hattiesburg, Mississippi. During that time, site ground water quality and conditions were characterized through multiple phases of investigation, which included the installation and sampling of 24 monitoring wells and over 30 temporary well points. The lateral extent of affected ground water was delineated and was also confirmed through eight initial quarterly monitoring events conducted from late 2001 through 2003. In 2004, KMC LLC requested and the Mississippi Department of Environmental Quality (MDEQ) approved a decrease to annual ground water monitoring frequency for the Gulf States Creosoting site.

Two separate and distinct areas of ground water contamination were identified during the RI: the former Process Area/northeast drainage ditch area and the Gordon's Creek Fill Area. The shallow geology beneath these areas is significantly different and the shallow water-bearing zones beneath the two areas are not hydraulically connected. The two affected ground water zones are unused for any purpose in the Hattiesburg area. Furthermore, in 2002 the Hattiesburg City Council adopted an ordinance establishing rules and regulations for the development and use of ground water resources within the City limits.

From 2003 through 2007, Tronox implemented remedial measures that included the removal and offsite disposal of materials representing potential sources of ground water contamination (i.e., materials containing free product and creosote-saturated soils). In addition, remedial measures included containment and control elements designed to either reduce the potential for migration of constituents via the ground water pathway or to preclude the potential for infiltration/percolation of water through affected soils left in place.

The results of the initial eight quarterly ground water monitoring events and subsequent annual monitoring indicate that constituent concentrations in both affected areas have reached either steady-state or declining conditions. An evaluation of the ground water data also indicates that since source materials have been removed, conditions are generally favorable for natural attenuation of ground water constituents.

1.0 Introduction

This *Ground Water Monitoring Report* documents the results of ground water monitoring activities conducted at the former Gulf States Creosoting site in February 2009. Ground water monitoring was performed in accordance with the Mississippi Department of Environmental Quality (MDEQ)-approved *Ground Water Monitoring Plan* (Michael Pisani & Associates, June 25, 2001). Detailed site background, including information on previous ground water investigations and source area remediation, was provided in Section 1.0 of the *Ground Water Monitoring Report, Initial Eight Quarterly Events* (Michael Pisani & Associates, March 16, 2005). This background information is provided as Appendix A to this report.

2.0 Ground Water Monitoring Program

This section describes the ground water monitoring program for the site. Ground water sampling procedures are discussed in greater detail in Sections 3 and 4 of the *Ground Water Monitoring Plan (GWMP)*.

2.1 Ground Water Monitoring Well Network

During the RI, a network of 24 monitoring wells was installed to monitor ground water quality and conditions beneath the site. In 2005, Tronox, with the approval of MDEQ, plugged and abandoned (P&A'd) five wells that were outside of affected areas and did not function as plume-defining wells. In July 2007, MDEQ requested that Tronox P&A two addition wells, MW-07 and MW-13, and P&A and replace well MW-09, which was damaged during road construction in 2005. MP&A completed the requested activities in September 2007.

Existing monitoring well locations are depicted on Figure 1-1. Well completion information is summarized in Table 2-1.

2.2 Summary of Ground Water Monitoring Activities

The February 2009 monitoring event was conducted during the week of February 2, 2009. Activities undertaken during the event included:

- Recorded static water levels in all existing monitoring wells;
- Purged wells to facilitate the collection of representative ground water samples;
- Collected samples for laboratory analyses; and
- Analyzed samples for site constituents and biogeochemical parameters.

Ground water monitoring activities are described in further detail in the following subsections.

2.2.1 Sample Containers and Preservatives

For each sampling event, clean, dedicated sample containers are provided by Tronox's contract laboratory, Lancaster Laboratories of Lancaster, Pennsylvania. The laboratory added the appropriate type and volume of chemical preservative to each sample container prior to shipping. The appropriate container type, preservative, and prescribed holding time for each analysis are summarized in Table 3-1 of the GWMP.

2.2.2 Water Level Measurement and Well Purging

Prior to purging, the water level in each well was measured to the nearest 0.01 foot with an electronic water level indicator. Water level data were used in conjunction with surveyed top-of-casing data to determine ground water elevations, flow direction, and hydraulic gradient. A discussion regarding ground water flow beneath the site is presented in Section 3.1 of this report.

Prior to sampling, wells were purged with an adjustable-rate, low-flow submersible pump and disposable polyethylene tubing. When necessary, the pumping rate was adjusted so that the purge rate was equal to the recharge rate (i.e., little or no drawdown was induced in the well). During purging, a multiprobe meter with a flow-through cell was used to monitor field parameters (i.e., pH, Eh, specific conductance, temperature, and dissolved oxygen). The approximate volume of water removed during purging was measured and recorded. Well purging was considered complete when field indicator parameters had stabilized to within 10 percent of the mean for three consecutive readings and less than 0.1 meter of drawdown was induced.

2.2.3 Sample Collection and Handling

Once well purging was complete, ground water samples were collected with the low-flow pump and dedicated tubing. In accordance with US EPA-prescribed procedures, the intake for the tubing was placed at the approximate midpoint of the screened interval. Ground water was discharged directly from the tubing into clean, laboratory-supplied sample containers. Samples for analyses of biogeochemical analysis were collected first, followed by samples for PAH analysis. Samples were placed immediately on ice in insulated coolers. Strict chain-of-custody documentation was maintained during sample collection, transport, and laboratory analysis.

Samples were packaged in a manner that minimized the potential for leakage or breakage. Sample coolers were delivered to the analytical laboratory via overnight courier. The temperature of the samples was recorded upon receipt at the laboratory.

2.2.4 Chain-of-Custody Control

Chain-of-custody forms were utilized to document sample custody from collection through analysis. Custody forms contain the following information:

- Sample identification number;
- Sampler's printed name and signature;
- Date and time of sample collection;
- Sample matrix;
- Analyses requested;
- Chemical preservatives; and
- Signatures of individuals in possession of the samples at any time.

The sampler retained one copy of each chain-of-custody form. Two copies of each form were shipped to the laboratory inside the sample coolers. Chain-of-custody seals were placed on each cooler to prevent tampering with the samples. Samples remained in the physical possession of the sample custodian, in direct view of the sample custodian, or stored in a secured area at all times.

2.2.5 Analytical Program

Samples were analyzed for polycyclic aromatic hydrocarbons (PAHs) by SW-846 Method 8310 and for biogeochemical parameters by appropriate methods to determine if conditions continue to be favorable for monitored natural attenuation (MNA) to occur. Data obtained from these analyses are used to document intrinsic remediation of ground water constituents and may, in the future, be utilized in the evaluation of solute fate and transport. Specific parameters for the analytical program are listed in Table 2-2.

3.0 Ground Water Monitoring Results

This section summarizes the results from the February 2009 ground water monitoring event. Information on ground water flow, a summary of laboratory analytical results, and an evaluation of monitored natural attenuation are provided in the following subsections.

3.1 Ground Water Flow Assessment

Prior to sampling, water level measurements were recorded in all wells in the monitoring well network. Water level data were used in conjunction with surveyed top-of-casing data to determine ground water elevations. A summary of ground water elevation data is presented in Table 3-1.

Ground water elevation data were then contoured to determine ground water flow direction and gradient beneath the site. Figure 3-1 shows the potentiometric surface beneath the former Process Area and offsite areas; the Fill Area potentiometric surface is shown on Figure 3-2.

The February 2009 ground water elevation data are consistent with the data from previous ground water investigations at the site. The data indicate that the shallow water-bearing zones beneath the former Process Area and the Fill Area are not hydraulically connected. Ground water flow within the sand channel beneath the former Process Area is eastward in the general direction of the Leaf River, generally at an extremely flat gradient. Ground water flow continues in an easterly direction beneath the adjacent residential area. The average hydraulic gradient between MW-4 and MW-22 is approximately 0.003 (i.e., 3 feet per thousand feet).

Ground water within the Fill Area sands flows westward toward Gordon's Creek and downstream along the creek. The average hydraulic gradient between MW-11 and MW-15 is approximately 0.005 (i.e., 5 feet per thousand feet).

3.2 Ground Water Analytical Results

Ground water analytical results from the initial eight quarterly sampling events and subsequent annual events are summarized in Table 3-2; laboratory reports are provided in Appendix B. Consistent with previous ground water monitoring results, the number and concentrations of PAH compounds are highest in wells within areas where creosote and creosote residuals were handled and/or deposited (i.e., the former Process Area, the Fill Area, and the northeast drainage ditch). The number and concentrations of PAHs decrease dramatically with distance from these areas. The approximate extent of affected ground water is shown on Figure 3-3.

Naphthalene continues to be the most prevalent PAH compound detected in site ground water and is the only constituent reported at levels exceeding MDEQ Tier 1 Target Remediation Goals (TRGs) in wells located outside of historical source areas. This is to be expected, as naphthalene: 1) is the most abundant single constituent of coal tar (*The*

Merck Index, 12th Edition, 1996); and 2) has the highest water solubility of any of the PAHs (31 milligrams per liter, or mg/L). Although naphthalene concentrations exceed the MDEQ TRGs, it is important to note that shallow ground water in the Hattiesburg area is unused and that a 2002 City ordinance established rules and regulations for the development and use of ground water resources within the City limits.

Charts showing naphthalene concentrations over time are provided in Appendix C. Initially, concentrations were plotted on a linear scale. Where necessary due to highly variable concentrations, concentrations were also plotted on a logarithmic scale.

Since 2003, naphthalene concentrations in all wells show overall decreasing trends, indicating that the source removal activities conducted in 2003 are achieving their desired goals. Naphthalene concentrations in wells MW-17 and MW-19, located immediately adjacent to the northeast drainage ditch, have exhibited decreases of two orders of magnitude. None of the wells showed increasing concentration trends, nor have any target constituents been reported for the first time in any plume defining or "sentinel" wells.

Well MW-12 is located immediately downgradient (and downstream on Gordon's Creek) from the containment area defined by the Waterloo Barrier System installed at the Fill Area in April and May 2003. Almost immediately upon installation of the sheet pile barrier, the naphthalene concentration in MW-12 decreased from several hundred mg/L to nearly non-detectable concentrations. Results from MW-12 demonstrate that in addition to cutting off the potential release of DNAPL to Gordon's Creek, the Waterloo Barrier is serving to prevent affected ground water in the Fill Area from spreading laterally.

3.3 Natural Attenuation Evaluation

Ground water samples were analyzed for biogeochemical parameters in order to help determine if conditions continue to be favorable for monitored natural attenuation. As discussed in previous submittals, Tronox does not view MNA as a stand-alone ground water remedy. Tronox has performed site remediation that includes source removal/ containment and control measures that address potential sources of affected ground water in the former Process Area, the Fill Area, and along the northeast drainage ditch. Tronox does not view MNA to be a "no action" remedy, but rather an alternative that augments source removal/control measures in helping to achieve remedial objectives that are protective of human health and the environment.

The biogeochemical results are presented with the PAH data in Tables 3-2. The first step in the natural attenuation evaluation process is to determine if conditions in the affected aquifers are favorable for natural attenuation to occur. A "line of evidence" for this demonstration is developed by evaluating and comparing values for biogeochemical indicator parameters in samples collected from wells within the plume to those in samples from wells outside the plume. Table 3-3 presents the results of such a comparison for the initial eight quarterly monitoring events and two subsequent annual events.

According to the US EPA, trends that support occurrence of natural attenuation include the following:

- Dissolved oxygen concentrations below background;
- Nitrate concentrations below background;
- Iron (+2) concentrations above background;
- Sulfate concentrations below background; and
- Methane concentrations above background.

The MNA results summarized in Table 3-3 indicate that, with the exception of MW-2R, most wells within the former Process Area/northeast drainage ditch plume showed strong evidence or positive trend analysis indicating natural attenuation. Although samples from MW-2R do not necessarily exhibit evidence that conditions are favorable for natural attenuation, naphthalene concentrations show a steady-state to declining trend. The evaluation was less meaningful for the Fill Area because ever since installation of the Waterloo Barrier in 2003, well MW-12 is no longer really located within the Fill Area plume. Overall, however, the data demonstrate that conditions are favorable for natural attenuation to occur, and the overall decreasing naphthalene concentrations are an indication of such attenuation.

4.0 Future Ground Water Monitoring Activities

This section presents details regarding proposed modifications to the ground water monitoring program.

4.1 Monitoring Frequency

The analytical results from the first eight quarterly monitoring events did not indicate seasonal fluctuations in constituent concentrations or flow direction during the initial two-year monitoring period. The 2008 event was the fifth annual event following the initial two years of quarterly ground water monitoring. For the following reasons, Tronox believes that a decrease in monitoring frequency to every other year is warranted:

- All sources of ongoing contamination have been addressed through either source removal or engineering controls;
- The low ground water gradient results in little potential for lateral migration of contaminants; and
- The two contaminant plumes exhibit trends indicating that ground water conditions are improving over time as a result of remedial activities conducted from 2003 through 2007.

Tronox looks forward to MDEQ's response to our request for decreased monitoring frequency.

4.2 Monitoring Well Network

As of September 2007, all superfluous monitoring wells (i.e., wells that were outside of affected areas and did not function as plume-defining wells) have been plugged and abandoned, in accordance with MDEQ policy. The 17 remaining wells will comprise the monitoring well network until other modifications are approved by MDEQ.

5.0 Summary and Conclusions

The following summary and conclusions are based on the results of ground water monitoring activities at the site to date:

1. Tronox has conducted ground water investigations at the site since 1996. Affected ground water is present in two separate and distinct areas. The extent of affected ground water in both areas has been delineated.

2. The affected shallow water-bearing zones are not used for any purpose in the Hattiesburg area. Furthermore, a 2002 City ordinance establishing rules and regulations for the development and use of ground water within the City limits.

3. Tronox has completed remedial measures that included the removal of potential sources of ground water contamination. In addition, containment measures (i.e., vertical and horizontal barriers) reduce the potential for migration of affected ground water and preclude infiltration/percolation of water through affected soils left in place.

4. Constituent concentrations in both affected areas have reached either steady-state or declining conditions. Furthermore, sampling results indicate that conditions are favorable for continued natural attenuation of ground water constituents.

5. Tronox is requesting a decrease in ground water monitoring frequency to every other year for the following reasons:
   - All sources of ongoing contamination have been addressed through either source removal or engineering controls;
   - The low ground water gradient results in little potential for lateral migration of contaminants; and
   - The two contaminant plumes exhibit trends indicating that ground water conditions are improving over time as a result of remedial activities conducted from 2003 through 2007.

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