STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

FILE COPY

October 5, 2010

Mr. Bobby Chain
Chain Electric
P.O. Box 2058
Hattiesburg, MS 39403

Re: Chain Electric 16th Section Lease Property
State No-Further-Action Letter
Hattiesburg, Forrest County, Mississippi

Dear Mr. Chain:

The Mississippi Department of Environmental Quality (MDEQ) has completed a review of the Gulf States Creosote site file regarding soil removal from the property adjacent to Scooba Street in February 2005. A memo to the file documents that a limited amount of creosote contaminated soil was removed from the property and backfilled with clean material. Therefore, the MDEQ requires no further remedial action at this site at this time. If cleanup standards change or additional data becomes available for the site then MDEQ will notify the appropriate parties of the need for any additional investigation(s) or remedial action(s). These actions will be consistent with our need to protect human health, welfare, and/or the environment.

If you have any questions, concerning this matter, please contact me at (601) 961-5318.

Sincerely,

Tony Russell, Chief
Assessment Remediation Branch

MEMORANDUM

TO:	Gulf States Creosote Site File Hattiesburg, MS
FROM:	Tony Russell 9/21/10
DATE:	September 21, 2010
SUBJECT:	File Area – Work on Well Vaults

I worked on the well vaults on September 17, 2010 to remove any rain water present in the vaults. Water was present in all the vaults. The water was pumped out using a battery operated pump and rags were used to soak up remaining water in order to dry the vaults. Once the water was removed, I then proceeded to remove the rubber sealant that had not adhered to the concrete in the bottom of the vaults. I left the vaults open so they could dry over the weekend as I was to meet Dickie on Monday to repaint the vaults.

I met with Dickie Allison (Tronox) on September 20, 2010 to continue work on the well vaults. It had not rained over the weekend so the vaults were dry. We cleaned out some more of the rubber sealant from the concrete and the sides of the vaults. We also used some fast drying concrete sealer on recovery wells: RW-17, RW-14, RW-13, RW-12, RW-11 and RW-8 in an effort to create a seal between the concrete and the vaults and the wells. It was a very fast drying compound; once mixed with cold water, it set up in about 5 minutes so we had to work very fast to get the mixture in place before setting up.

All the well vaults were re-painted with the black epoxy paint once we had completed the cleaning process except for wells: RW-8, RW-11 and RW-12. These wells were not painted as the paint had set up such that it was not usable any more.

NO photos were taken during this event.

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

MEMORANDUM

TO: Gulf States Creosote Site File
Hattiesburg, MS

FROM: Tony Russell 9/8/10

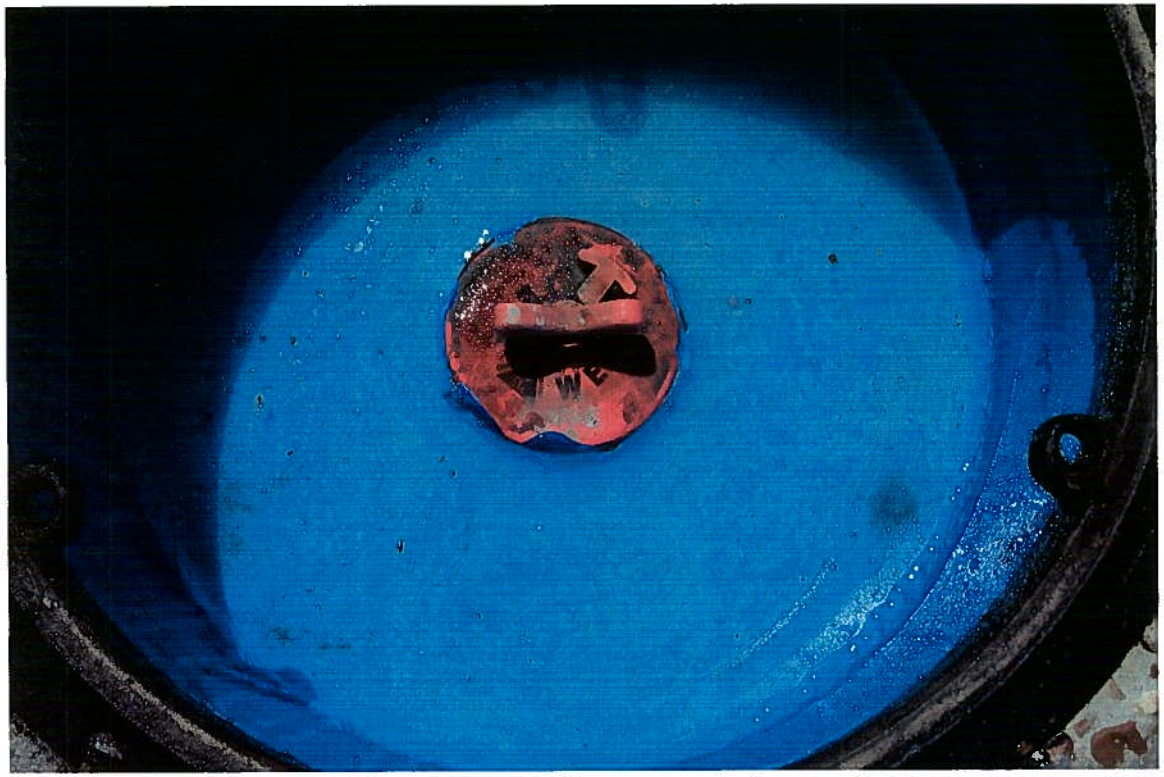
DATE: September 8, 2010

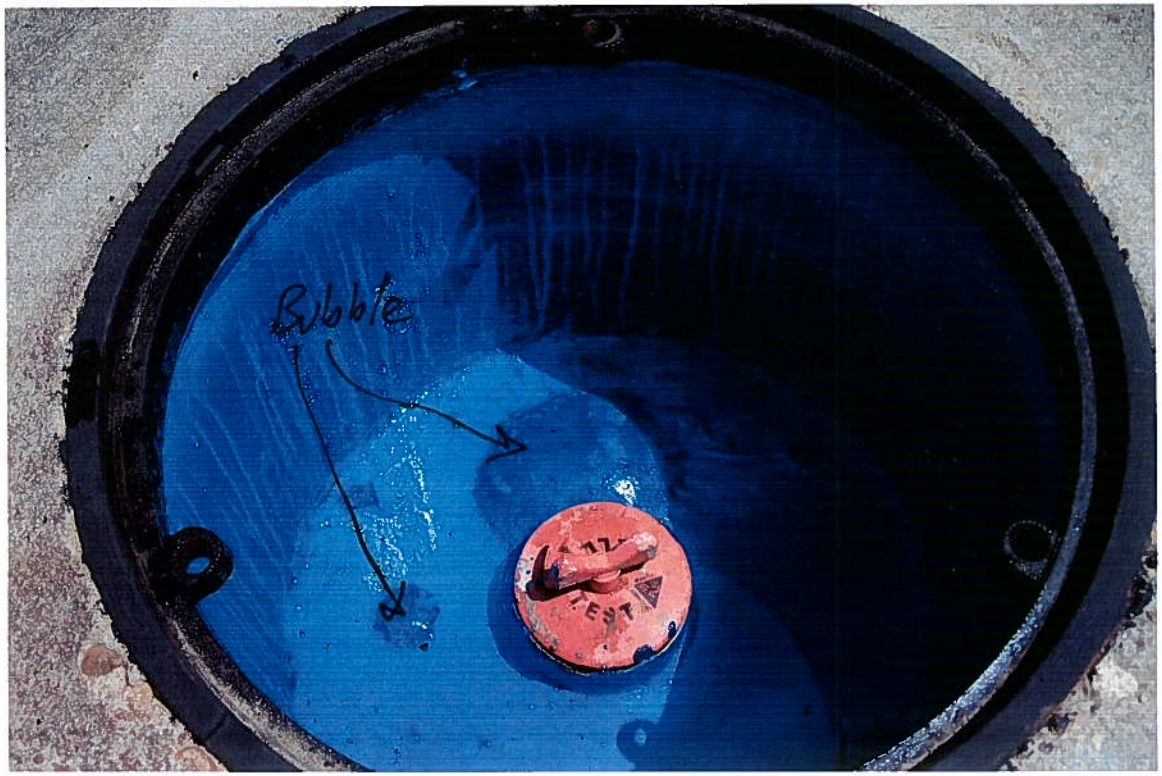
SUBJECT: Site Inspection of Fill Area Well Vaults Conducted

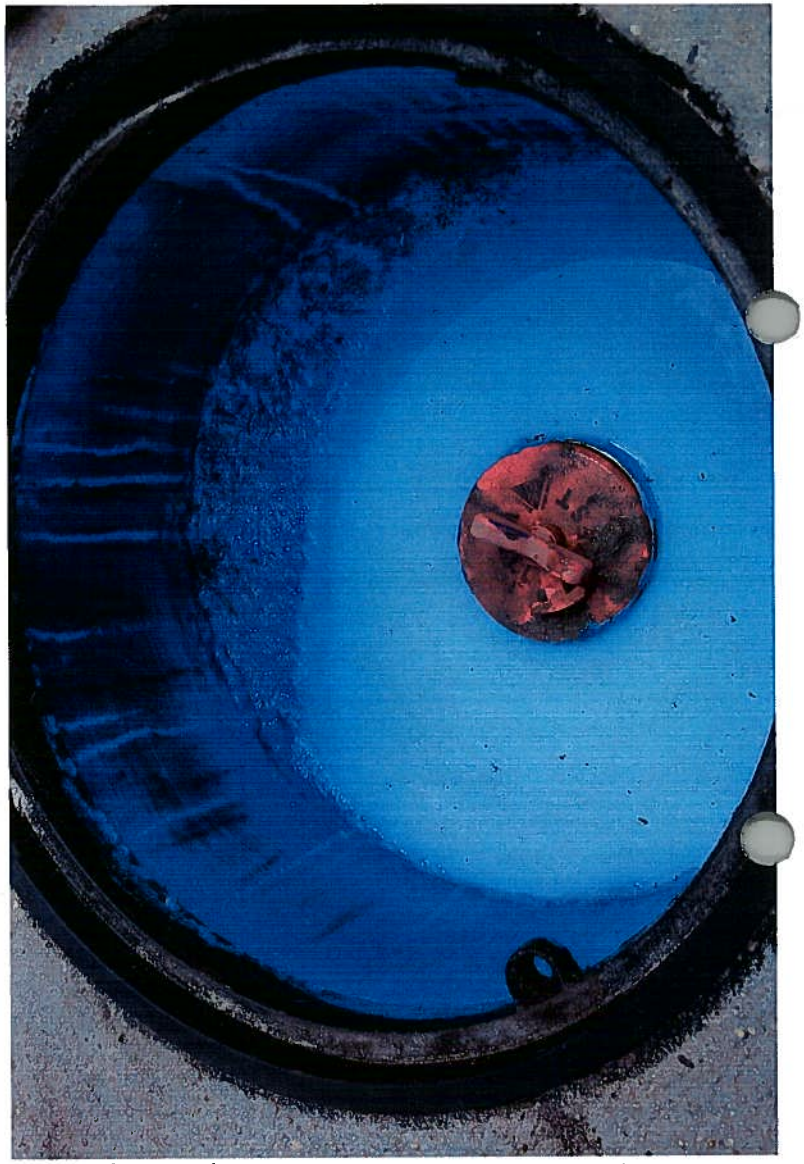
I conducted a site visit at the Fill Area on September 2, 2010 to observe the work conducted on August 24 on the recovery well vaults. The vaults were painted with a rubber sealant. Upon investigation of the previous work, it was noted that the sealant did not adhere to the concrete grout. The moisture present in the well from either rain or permeation through the concrete had caused the sealant to not adhere to the concrete. Several wells were checked and observed to be in this condition; therefore, it is assumed that all the wells will have to be reworked.

Photos were taken during this event and are attached to this memo.

GSC- Fill Area Site
Hattiesburg, Ms.
9/2/10







Photos of rubber sealant used on recovery well vaults. Light blue color indicates sealant failed

BONNER Analytical

2703 Oak Grove Road
Hattiesburg, MS 39402
601.264.2854 Phone
601.268.7084 Fax

September 01, 2010

Courtesy Ford
1410 W Pine Street
Hattiesburg, MS 39401

Attn: Tony Russell

REPORT NO.: 1008269 **PROJECT NO.: Parking Lot**

Please find enclosed the analytical report, including the Sample Summary, Sample Narrative and Chain of Custody for your sample set received August 24, 2010.

All analyses were performed in accordance with NELAC Standards using approved methods as indicated on this report.

If you have any questions about the results, please call. Thank you for using Bonner Analytical Testing for your analytical needs.

Sincerely,

Pam Thompson
Administrative Assistant

I certify that the data contained in this report has been generated and reviewed in accordance with the BATCO's QAP & SOPs developed under giudelines provided by EPA, ASTM or other certifed test methods. Assurance Program. Exceptions, if any, are discussed in the sample narrative. Samples will be retained for 30 days from the date of this report, then disposed in an appropiate manner. Bonner reserves the right to return samples identified as hazardous. Release of this Final Report is authorized as verified by the following signature.

Approved by: M.S. Bonner

Michael S. Bonner, Ph.D.

The total number of pages in this report, including this page is 3.

BONNER Analytical

2703 Oak Grove Road
Hattiesburg, MS 39402
601.264.2854 Phone
601.268.7084 Fax

Courtesy Ford
1410 W Pine Street
Hattiesburg, MS 39401

Attn: Tony Russell

REPORT NO. : 1008269
DATE REC'D : 08/24/2010
REPORT DATE : 09/01/2010
PREPARED BY : Pam Thompson For Chris Bonner
PROJECT NO. : Parking Lot

Sample ID: **Courtesy Ford Parking Lot Dirt** Matrix: **Soil** Sample Date/Time: **08/24/10 10:37** Lab No. : **1008269-01**

	Results	Units	MDL	MRL	Qualifiers	Date Analyzed	Analyst
EPA 2870C							
Acenaphthene	ND	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Acenaphthylene	236	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Anthracene	164	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Benzo (a) anthracene	778	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Benzo (a) pyrene	448	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Benzo (b) fluoranthene	2080	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Benzo (g,h,i) perylene	275	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Benzo (k) fluoranthene	754	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Chrysene	969	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Dibenz (a,h) anthracene	198	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Fluoranthene	872	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Fluorene	ND	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Indeno (1,2,3-cd) pyrene	340	ug/kg	3.90	5.00		08/30/10 20:24	ZZZ
Naphthalene	ND	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Phenanthrene	183	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ
Pyrene	1300	ug/kg	83.5	83.5		08/30/10 20:24	ZZZ

BONNER Analytical

2703 Oak Grove Road
Hattiesburg, MS 39402
601.264.2854 Phone
601.268.7084 Fax

Qualifer Descriptions

Definitions

The initials XXX indicates the analyst is the client

MDL = Method Detection Limit
MRL = Method Reporting Limit
ND = Not Detected
COMP = Complete
SUBCON = Subcontracted analysis
mv = millivolts
pci/L = picocurie per Liter
mL/L = milliliters/Liter
mg = milligram
Present = Coliform bacteria present
Absent = Coliform bacteria absent

ug/l = Microgram per Liter = parts per billion (ppb)
ug/kg = Microgram per kilogram = parts per billion (ppb)
mg/l = Millgram per liter parts per million (ppm)
mg/kg = Millgram per kilogram parts per million (ppm)
NOT PRES = Not Present
ppm = Parts per million
* = Result outside established limits.
mg/m3 = Milligrams/ meter cubed
ng/L = Nanograms per Liter = Parts per trillion(ppt)
> = Greater Than

When the word "dry" follows the units on the result page the sample results are dry weight corrected.

LODs and LOQs are dry weight corrected for all soils except methanol and methylene chloride preserved soils.

Fw: Parking lot
toddmixon
to:
tony_russell
09/02/2010 01:10 PM
Please respond to toddmixon
Show Details

History: This message has been replied to.

Sent from my BlackBerry® smartphone

From: "Sherry Roberts" <sroberts@batco.com>
Date: Wed, 1 Sep 2010 11:40:53 -0500
To: <toddmixon@bellsouth.net>
Subject: FW: Parking lot

From: Pam Thompson [mailto:pthompson@batco.local]
Sent: Wednesday, September 01, 2010 11:39 AM
To: sroberts@batco.com
Subject: Parking lot

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

MEMORANDUM

TO: Gulf States Creosote Site File
Hattiesburg, MS

FROM: Tony Russell 8/24/10

DATE: August 26, 2010

SUBJECT: Fill Area – Product Removal Event August 2010

I met with Dickie Allison (Tronox) on August 23 & 24, 2010 to observe the removal of product from recovery wells. Dickie checked the wells as usual using a nylon string with a weight to verify if creosote was present in a well. Measurable product was discovered in only 3 wells during this event: MW-6 (.79 ft), RW-7 (.21 ft) and RW-8 (.22 ft). Trace amounts were detected in RW-3, RW-4, RW-5, RW-6 and RW-10.

None of the wells were flowing during this site event. All the well vaults contained clear water which is from the recent rain events. Painting the well vaults and covers appears to have eliminated the iron problem.

All the recovery well vaults and grout were painted with a rubber sealant in an attempt to create a non-permeable seal within the vaults except for the wells that were re-grouted and RW-11. The grout in RW-11 was damp so it was not painted during this event. The following 6 wells were re-grouted with quik-crete to give the sealant a better surface to adhere to: RW-10, RW-9, RW-7, RW-16, RW-1 and RW-15.

Surface water samples were collected from the same three locations that MDEQ has been collecting surface water samples: down-gradient of the wall, adjacent to the wall below the sewer line crossing Gordon's Creek and up-gradient of the wall. No obvious sheens or creosote was observed in Gordon's Creek. Collected split on sediment sample location SD-2.

Photos were taken during this event and are attached to this memo.

GSC - Fill Area 8-25, 2010
Hattiesburg, MS,

Well vaults after sealant applied

MATERIAL USED TO SEAL Concrete, & vaults

well vault prior to sealing

STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

MEMORANDUM

TO:	Gulf States Creosote Site File Hattiesburg, MS
FROM:	Tony Russell 8/26/10
DATE:	August 26, 2010
SUBJECT:	Courtesy Ford Soil Pile Inv & Sampling Event

I met with Courtesy Ford's General Manager (Mr. Mixon) on August 24, 2010 after observing a pile of soil behind the used vehicle sales office. Warren Paving had workers on site scrapping the soil up so that the area could be paved with asphalt. The inspection was conducted due to a compliant from the local activist group – FCEST.

The meeting with Mr. Mixon went well. He knew that the area was restricted but thought that he could scrap the upper couple inches off without causing any problems. I explained the entire area was under a restrictive use order and that no soil could be excavated without first contacting MDEQ for approval. After more discussion, he called Bonner Analytical about getting some one over to pull sample from the soil pile.

At approximately 1015 hrs, Mike Bonner arrived to pull the sample. He collected a composite sample from the soil pile into a stainless steel bowl. He then thoroughly mixed the sample and then evenly distributed the sample into two sample containers. The sample will be delivered to OPC lab in Pearl for semi-volatile analysis by Method 8270.

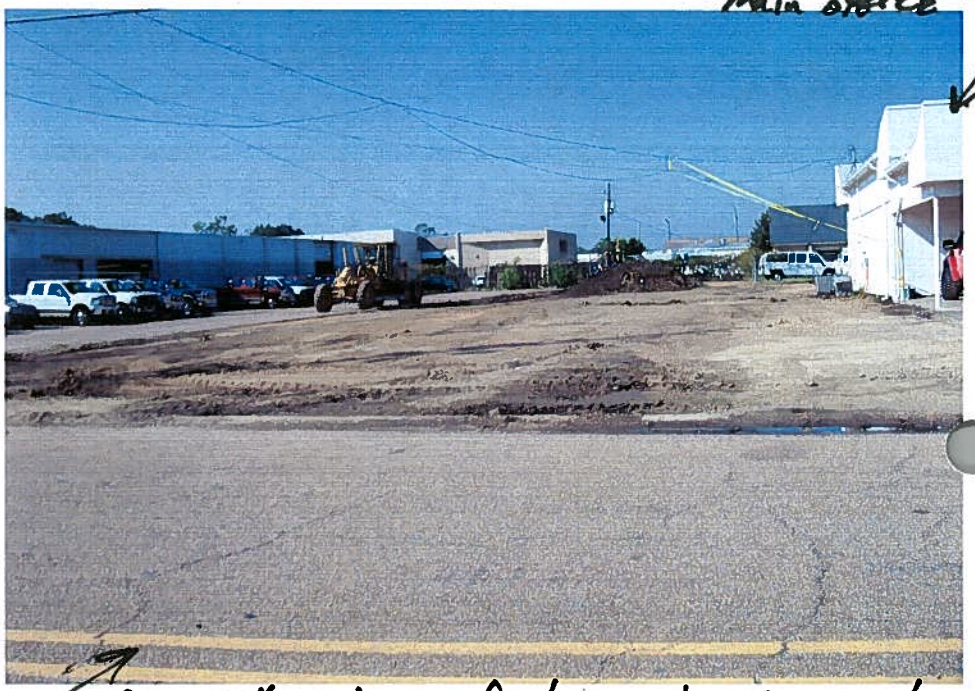
Photos were taken during this event and are attached to this memo.

Courtsey Ford Dealership
Hattiesburg, Ms.

8/24/10

Soil w/ creosote timbers (Old Ties)

Courtsey Ford Used Car Main office



Over-all view of Area being Scrapped

Soil Sample collected from soil pile to determine disposal options

Area being scrapped so it can be paved with asphalt

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

MEMORANDUM

TO: Gulf States Creosote Site File
Hattiesburg, MS

FROM: Tony Russell

DATE: June 4, 2010

SUBJECT: Fill Area

I met with Dickie Allison (Tronox) the week of May 17th to observe the removal of product from recovery wells and the sandblasting and painting of the well covers and well vaults. Dickie checked the wells as usual using a nylon string with a weight to verify if creosote was present in a well. Product was discovered in only 2 wells during this event: MW-6 (.65 ft) and RW-7 (.23 ft).

None of the wells were observed to be flowing during this sampling event.

Surface water samples were collected from the same three locations that MDEQ has been collecting surface water samples: down-gradient of the wall (SW-1), adjacent to the wall below the sewer line crossing Gordon's Creek (SW-2) and up-gradient of the wall (SW-3). No obvious sheens or creosote was observed in Gordon's Creek. I collected a split from SW-2 location. The sample will be analyzed for semi-volatiles.

All the well covers were sand blasted and repainted. The vaults for only the recovery wells were sandblasted and repainted. The staining on the concrete was sandblasted as well.

A cement/bentonite grout was added to the following recovery wells: RW-2, RW-3, RW-4, RW-5, RW-6, RW-8, RW-9, RW-11, RW-12, RW-13, RW-14, and RW-17. The grout was added as the existing grout was either too thin or damaged.

Photos were taken are attached to this memo.

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

May 10, 2010

FILE COPY

Mr. Robert Pounds
Tronox LLC
P. O. Box 268859
Oklahoma City, OK 73126-8859

Re: Gulf States Creosote Site
Monitored Natural Attenuation Results and Recommendations Report
dated December 2, 2010
Hattiesburg, Mississippi

Dear Mr. Pounds:

The Mississippi Department of Environmental Quality (MDEQ) has completed review of the above referenced report. MDEQ can not concur with all the recommendations proposed in the report at this time due to the sensitivity of the site.

MDEQ concurs with the recommendation to discontinue the collection of monitored natural attenuation geochemical data. MDEQ also will not require that MW-15 be sampled during the next annual sampling event scheduled for December 2010.

Please call me with any questions you may have concerning this matter at 601-961-5318.

Sincerely,

Tony Russell, Chief
Assessment Remediation Branch

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

May 10, 2010

FILE COPY

Mr. Robert Pounds
Tronox LLC
P. O. Box 268859
Oklahoma City, OK 73126-8859

Re: Gulf States Creosote Site
Groundwater Monitoring Calendar Year 2009 Event Report dated
February 22, 2010
Hattiesburg, Mississippi

Dear Mr. Pounds:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced report and finds the report to be satisfactory documentation for its intended purpose. Therefore, MDEQ concurs with report.

MDEQ requires that the annual sampling event be conducted in December 2010. Per MDEQ review of the Monitored Natural Attenuation Results and Recommendation report dated December 2, 2009, MDEQ requires that all the wells be sampled except MW-15. The groundwater samples will be analyzed for poly-nuclear aromatic hydrocarbons (PAHs) using EPA Method 8310. Please notify MDEQ within 2 weeks of the actual sampling date. MDEQ also requires that pre-preserved sample containers be provided for MDEQ's split samples.

Please call me with any questions you may have concerning this matter at 601-961-5318.

Sincerely,

DA Russell

Tony Russell, Chief
Assessment Remediation Branch

Gloria Tatum/FS/OPC/DEQ

05/04/2010 02:51 PM

To mayor@hattiesburgms.com, ftate@hattiesburgms.com, jbjspecial@comcast.net, grandoris33@comcast.net, jim_benton1@yahoo.com,
cc Melissa Collier/OPC/DEQ@DEQ, Dot Lewis/Air/OPC/DEQ@DEQ, Trey Hess/HW/OPC/DEQ@DEQ, Jerry
bcc

Subject Gulf State Creosote site in Hattiesburg, for information and community engagement purposes

Notice of work to be performed during the week of May 17-21, 2010 (weather permitting)

- Tronox will be on-site to check and remove any free product detected in any wells (quarterly event) as required in the approved plan.
- Tronox will sand blast the concrete to remove the iron staining.
- Tronox will sand blast the well covers and vaults and then will paint the covers and vaults with an epoxy sealer to prevent future iron staining of concrete.
- Tronox staff and officials will not be identified by "marked" vehicles and/or clothing