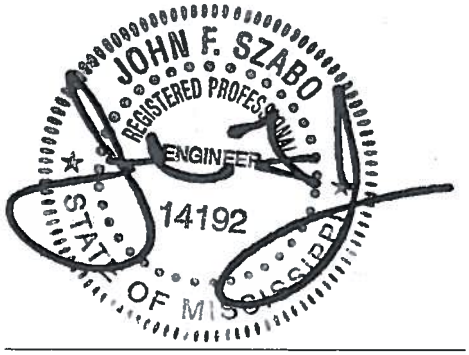
FINAL
CORRECTIVE ACTION PLAN

Former Gulfport Fertilizer Site
33rd Street
Gulfport, Mississippi

Presented on Behalf of:
Hancock Bank
2510 14th Street
Gulfport, MS 39501

January 2009



John F. Szabo, P.E./Project Manager

Prepared by:
COVINGTON AND ASSOCIATES CORPORATION
Address: 14257 Dedeaux Road, Suite B
Gulfport, Mississippi 39503
(228) 396-0486
FAX: (228) 396-0487

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1.0 INTRODUCTION

Hancock Bank owns approximately 145 acres of unimproved, vacant property in Gulfport, MS bounded on the south by 33rd Street, on the west by 34th Avenue, on the north by North Gulfport Subdivision and on the east by the railroad (Figure 1). The property is located in Section 33, Township 7 South, Range 11 West, City of Gulfport, Harrison County, Mississippi. The property consists of approximately 33-acre tract (Former Gulfport Fertilizer Site) owned by Hancock Bank since the late 1970s on which the Gulfport Fertilizer Company operated a super-phosphate fertilizer operation from about 1914–1920. The remaining approximately 112 acre tract was acquired by Hancock Bank in late March 2005 from the Harreld Family Trust and is a vacant, undeveloped, heavily wooded property (Figure 2). Since Hurricane Katrina in August 2005, the southern portion of the Harreld Family Trust property has been cleared (along 33rd Street and partially along 34th Avenue). The remainder of the property (e.g. northern portion) has remained heavily wooded.

The Former Gulfport Fertilizer Site, the original 33 acres (Figure 2), was found to have contamination in the soil and groundwater, probably as a result of the super-phosphate operations on the site. Beginning in September 1998, Butler Services of Mississippi, Inc. (Butler Services), on behalf of Hancock Bank, began a site characterization investigation to determine the nature and extent of contamination on the site. Butler Services collected 260 soil samples on the site from 0'-2' and 2'-4' below the ground surface (BGS). The collected soil samples were analyzed for arsenic and lead.

The results of the Butler Services investigation were presented in the *Site Characterization Report* for the site dated October 25, 1999. The report concluded that there were four (4) major source areas on the site where the arsenic and/or lead regulatory limits were exceeded in the site soils from 0'-4' BGS. The report recommended that additional soil samples be collected to determine the vertical extent of the arsenic and/or lead soil contamination. Installation of monitoring wells and collecting groundwater samples was also recommended in order to evaluate the extent of groundwater contamination at the site, refer to Section 2.

After reviewing the *Site Characterization Report* for the subject site, the Mississippi Department of Environmental Quality (MDEQ) required that:

- the horizontal and vertical extent of soil contamination along the western boundary of the Former Gulfport Fertilizer site be determined;
- six (6) monitoring wells be installed on the site; and
- all borings be advanced to approximately fifteen (15) feet below ground surface.

Butler Services prepared a work plan for this supplemental investigation – *Work Plan Off-Site/Source Area Soils and Groundwater Sampling* – addressing MDEQ's requirements.

Hancock Bank hired Covington and Associates Corporation (CAC) in late October 2001 to replace Butler Services in implementing the Work Plan for the supplemental site investigation. CAC advanced forty-three (43) on-site geoprobe borings and twenty-two (22) off-site geoprobe

borings. Soil samples were collected at 2' intervals from 0' – 8' below the ground surface (BGS) and at 4' intervals from 8' BGS to 8'-16' BGS or to the low permeability confining clay layer, whichever was less. The soil samples collected from the 0'-2' BGS and 2'-4' BGS soil intervals were analyzed to determine the arsenic and lead concentration in each soil interval. At those locations where the arsenic and/or lead concentration exceeded the site's regulatory limits (7.18 mg/kg for arsenic and 400 mg/kg for lead, assuming the site would be used for unrestricted – residential - purposes in the future), samples from subsequent soil intervals were analyzed until the arsenic and/or lead concentration were below the site's regulatory limits. Two-foot (2') stream sediment samples were taken from four (4) locations along the stream located west of the western boundary of the Former Gulfport Fertilizer Site. Each stream sediment sample was analyzed for arsenic and lead. Groundwater samples were taken from twelve (12) of the boring locations.

The supplemental site investigation findings were presented in the *Supplemental Site Characterization Report* prepared by CAC and submitted to MDEQ on November 8, 2002. The supplemental site investigation determined:

- The low permeability confining clay layer is 20'-26.5' BGS.
- The horizontal and vertical extent of the arsenic soil concentrations exceeding the site's regulatory limit for arsenic in soil (7.18 mg/kg) has been adequately defined, except in a small area on the off-site property (the Harreld Family Trust property) at 0'-2' BGS and 2'-4' BGS. It is felt that the horizontal and vertical extent in these off-site areas is within

100' of the last boring location advanced.

- The majority of the soil exceeding the site's regulatory limit for arsenic in soil occurs in the 0'-6' BGS soil interval.
- The total arsenic concentrations found in soil samples at the site do not exceed arsenic's TCLP regulatory limit (5.0 mg/l). Therefore, the site soils are not considered to be hazardous for arsenic.
- The horizontal and vertical extent of the lead soil concentrations exceeding the site's regulatory limit for lead in soil for unrestricted (residential) sites (400 mg/kg) has been adequately defined, except in a small area on the off-site property (the Harreld Family Trust Property) at 0'-2' BGS. It is felt that the horizontal and vertical extent in these off-site areas is within 100' of the last boring location advanced.
- The majority of the soil exceeding the regulatory limit for lead in soil at restricted (residential) sites occurs in the 0'-2' BGS soil interval.
- Sub-surface soils exceeding 3,800 mg/kg total lead concentration will be considered hazardous for lead (TCLP lead > 5.0 mg/l).
- All collected stream sediment samples were below the site's regulatory limit for arsenic in soil (7.18 mg/kg) and below the regulatory limit for lead in soil at unrestricted (residential) sites (400 mg/kg). It is concluded that the stream has not been impacted by previous site operations.
- All of the "unfiltered" (Total) groundwater samples collected exceeded MDEQ's Tier 1 TRG for arsenic in groundwater (0.010 mg/l) and for lead in groundwater (0.015 mg/l). It

is felt that this is due to the presence of soil particles in the "unfiltered" groundwater samples.

- Arsenic and lead analytical results for "filtered" (Dissolved) groundwater samples exceeded MDEQ's Tier 1 TRG in the northwest and west area of the site.

A naturally occurring radioactive material (NORM) survey was performed on the site by CAC. The survey included identifying two "hot spot" areas (areas where field radioactive readings exceeded 20 uR/hr) on the site. Following NORM survey procedures, soil samples were collected in a 100-meter sampling area east of the fertilizer production concrete slab. The soil samples were collected from 0"-6" BGS and from 6"-12" BGS. The collected soil samples were analyzed to determine the concentration of Radium-226 and Radium-228 in the soil samples in pico-curies per gram (pCi/gm).

The NORM survey determined the following:

- The horizontal and vertical extent of two (2) areas of the property where NORM concentrations exceeded the NORM regulatory limit for transfer of property for unrestricted (residential) uses were identified and adequately defined.

The two NORM areas have been fenced to minimize potential human contact and signs installed identifying the area.

In order to determine the extent of soil contamination off-site, on the adjacent Harreld Family Trust property, which is now part of the overall site, CAC proposed to perform a supplemental off-site soil investigation. MDEQ approved CAC's plan for collecting additional off-site soil borings on April 21, 2003. From April 2003 to November 2003, CAC advanced seventy (70) additional borings on the Harreld Family Trust property. On July 29, 2003, CAC submitted a *Supplemental Off-Site Characterization Report.* The report was revised and re-submitted on December 1, 2003.

The supplemental off-site soil investigation determined the following:

- The horizontal and vertical extent of the arsenic soil concentrations exceeding the site's regulatory limit for arsenic in off-site soil (7.18 mg/kg) has been defined.
- The majority of the off-site soil exceeding the site's regulatory limit for arsenic in soil occurs in the 0'-4' BGS soil intervals.
- The horizontal and vertical extent of the off-site lead soil concentrations exceeding the site's regulatory limit for lead in soil at unrestricted (residential) sites (400 mg/kg) has been defined.
- The off-site soil exceeding the regulatory limit for lead in soil at unrestricted (residential) sites occurs in the 0'-2' BGS soil interval, only.
- Off-site soils exceeding 3,800 mg/kg total lead concentration occurred at one location, only – OS-6, 0'-2' BGS – and will be considered hazardous for lead (TCLP lead > 5.0 mg/l), if excavated.

Figure 3 shows the horizontal extent of arsenic and lead contaminated soil identified on the site. CAC collected groundwater samples from seven (7) monitoring wells located on the Former Gulfport Fertilizer site for eight consecutive quarters from June 19, 2002 (First Sampling Round) to March 4, 2004 (Eighth Sampling Round). Each groundwater sample was analyzed for lead and arsenic concentrations. pH readings of each groundwater sample were also collected. CAC presented conclusions about the groundwater on the Former Gulfport Fertilizer site in a letter report entitled "Historical Groundwater Monitoring Report" dated August 10, 2004.

The data presented in this "Historical Groundwater Monitoring Report" for the Gulfport Fertilizer site demonstrated the following:

- The groundwater flow direction at this site has consistently followed a north to northwesterly path.
- Total Arsenic concentrations in the groundwater consistently exceeded the Tier 1 TRG of 0.010 mg/L at MW-2, MW-4 and MW-6, with minor excursions reported at MW-1, MW-3 and MW-7.
- Arsenic-contaminated groundwater potentially migrated onto the adjacent Harreld Family Trust (off-site) property, which, at the time, was not owned by Hancock Bank.
- Total Lead concentrations in the groundwater consistently exceeded the Tier 1 TRG of 0.015 mg/L at MW-1.
- Lead-contaminated groundwater is confined to the Former Gulfport Fertilizer site.
- Total metals data generally suggests that arsenic and lead concentrations in the

groundwater are influenced most by the associated metals concentrations in the soils, as opposed to the pH levels in the soil or groundwater.

- Soil analytical information presented in the November 8, 2002 *Supplemental Site Characterization Report* demonstrates that the arsenic in the soil is not highly mobile and does not leach into the groundwater.
- The soil TCLP data presented in the *Supplemental Site Characterization Report* does, however, support that lead may be leachable at high concentrations (above 3,800 mg/kg).

In order to estimate the extent of groundwater contamination on the Harreld Family Trust Property (off-site property), CAC advanced twelve (12) borings on the Harreld Family Trust Property on October 20 and 21, 2004. Groundwater samples were collected from each boring and analyzed for arsenic and lead. CAC estimated the extent of groundwater contamination based on the samples collected from the twelve (12) borings. Figure 3 shows the estimated extent of groundwater contamination on Hancock Bank property based on previous groundwater studies performed by CAC.

Hancock Bank is seeking to sell the property to a potential purchaser. It is still anticipated that the purchaser of the property will use the property for industrial purposes, only. As part of the purchase agreement, Hancock Bank is proposing to implement the activities presented in this Corrective Action Plan (CAP). Hancock Bank implemented activities required in the *Interim Corrective Action Plan (ICAP),* dated September 27, 2007, revised February 18, 2008 to address

comments from MDEQ and approved by MDEQ on March 18. 2008. The *ICAP* was implemented from May through July 2008.

This *Final Corrective Action Plan (FCAP)* presents the remaining activities to be implemented on the site.

1.1 Objectives and Rationale

It is anticipated that the property will be utilized for industrial purposes and that there will be controlled access to the property, this FCAP will present engineering and institutional controls, which will be implemented by Hancock Bank, in preparation for selling the property.

The engineering and institutional controls presented in this FCAP will protect human health and the environment since the soil contamination is confined to the site and has been shown not to be mobile - arsenic is not leachable at soil concentrations found on the site and concentrations of lead, which are leachable (above 3,800 mg/kg), have been removed from the site under the previously approved ICAP. Additionally, a large portion of the soil contamination is located in a wetlands area, which will remain. The wetlands minimize the potential for contaminated soil to migrate from the site.

The groundwater contamination is also confined to the site. Groundwater data collected during the site characterization investigations shows the groundwater concentrations to be stable, indicating that the soil is not a continuing source of contamination to the groundwater. It is anticipated that the engineering and institutional controls presented in this FCAP will show that the groundwater has been stabilized through source removal presented in ICAP and the capping of the contaminated soil portions of the site in this FCAP will further insure that the groundwater contamination does not increase or migrate, thus it is felt that long-term monitoring of the groundwater is not necessary.

2.0 CONCEPTUAL DESIGN

The following engineering and institutional controls will be implemented in accordance with the Schedule presented in Section 4.0 of this Corrective Action Plan.

2.1 Use Restrictions

It is anticipated that Use Restrictions will be placed on the property through a property deed restriction executed between Hancock Bank and MDEQ. It is anticipated that the Use Restrictions will include a survey plat showing the limits of soil contamination (Figure 3), the proposed soil cap area (Figure 4) and the limits of groundwater contamination (Figure 3).

2.2 Security Fencing

Under the Final Corrective Action Plan, a 6' tall, chain link security fencing will be placed around the limits of the 10" clay soil cap (Figure 4). There will be one gate that will allow access to the area inside the fence for maintenance and inspection work. The gate will be locked at all times other than when maintenance and inspection work is being done. There will be signs on the fence warning unauthorized personnel to stay out of the fenced area. Figure 4 shows the approximate layout of the security fence around the 10" clay cap.

2.3 Monitoring Well Installation and Monitoring

A total fourteen (14) monitoring wells have been installed to monitor the groundwater contamination at the site. The first seven (7) monitoring wells were installed on the original Gulfport Fertilizer site (e.g. original 33 acres) in 2001 and 2002. Each well was installed to a depth of 15' below ground surface (BGS) in accordance with the Work Plan Off-Site/Source Area Soils and Groundwater Sampling (the Work Plan) prepared by Butler Services of Mississippi, Inc. as approved by MDEQ on January 31, 2002. A formal groundwater monitoring program was subsequently initiated that included the collection of groundwater samples on a quarterly basis. Sampling events were conducted every 3-months (quarterly). This program was initiated in May 2002 and was concluded in March 2004, and incorporated eight rounds of groundwater samples from the seven original monitoring wells. The summation of this groundwater monitoring program was documented in a report that was submitted to the MDEQ in August 2004. A ninth or "Supplementary" sampling event was conducted in February 2006 to assess the groundwater quality in the aftermath of Hurricane Katrina. The results of that sampling event demonstrated that no appreciable change to the groundwater quality occurred as a result of Hurricane Katrina.

Seven additional monitoring wells (e.g. MW 9 through MW 14) were installed in October 2007 to delineate the extent of groundwater impacts from lead and arsenic on the annexed property (Harreld Family Property) to the north and west of the original fertilizer site, and for monitoring

the long-term groundwater quality of the entire 145-acre site. All fourteen (14) on-site monitoring wells were sampled in October 2007 and December 2008. The results of these sampling rounds confirm that the groundwater contamination remains onsite, has not migrated and is not significantly increasing in concentration or horizontal extent. In fact, the extent of groundwater contamination is significantly less than "Limit of Groundwater Contamination" estimated on Figure 3.

2.3.1 Proposed Long Term Groundwater Monitoring

It is proposed that sampling of the groundwater monitoring system (e.g. the fourteen monitoring wells) be conducted semi-annually for a period of three years after the installation of the 10" clay cap is completed. The monitoring wells will be sampled for pH, Arsenic and Lead. It is further proposed that groundwater monitoring cease after the three year period, if results of the groundwater sampling are consistent with the results of the eleven (11) sampling rounds completed at the site. Consistent results would be the limits of groundwater contamination, the hydraulic slope of the groundwater table and analytical results at each monitoring well location.

2.4 On-Site NORM Contamination

Two areas of Naturally Occurring Radioactive Material (NORM) contaminated soil have been identified on the original 33 acres. Although the NORM contamination at this site is not

regulated by the Mississippi State Department of Health (MSDH), Hancock Bank has taken measures to identify the NORM areas and to warn site personnel and contractors not to enter these areas. A 6-foot chain-link security fence has been installed around these two areas. Signs have been placed on the fence warning persons about the presence of NORM contamination and telling site personnel and contractors to keep out. The two NORM areas are within the site area that will be covered by the proposed 10" clay cap and contained within the security fence proposed in Section 2.2, above. The fencing around the two NORM areas will be removed when the clay cap is installed. The two NORM areas will be surveyed so they can be documented in the Use Restriction document.

2.5 Capping of Arsenic/Lead Contaminated Soil

A 10" clay cap will be placed over areas outside the wetlands where soil lead and arsenic containing soils exceed regulatory limits (7.18 mg/kg for arsenic and 1,700 mg/kg for lead on industrial sites). Figure 4 shows the proposed 10" clay cap. Areas of soil contamination outside the limits of the 10" clay cap will be excavated and moved into the cap area, prior to constructing the 10" clay cap. The excavated areas will be sampled in accordance with confirmation sampling procedures presented in the approved ICAP. Once the confirmation sampling shows that all contaminated soil has been removed from an area, the area will be backfilled. The existing concrete slab will remain in place and the clay cap will be tied into the edge(s) of the concrete slab. The existing concrete slab will be cleaned and pressure washed. The existing concrete slab

will be inspected to insure integrity and that no significant cracks exist. Any significant cracks will be sealed and areas of the exiting concrete slab that may not have sufficient integrity will be removed and either replaced with new concrete or a 10" clay cap. The proposed soil cap will not extend into the wetlands to the north or west of the original Gulfport Fertilizer Site (Figure 4).

The cap area will be prepared by scrapping vegetation off the area, smoothing out the area, proof-rolling with a loaded dump truck to identify any "soft" areas and undercutting "soft" areas (if necessary) and backfilling with clay. The excavated material from the "soft" area will be spread over the cap area. The 10" clay cap will be constructed by placing two (2) lifts of clay. Each lift will be compacted to 95% density based on the Standard Proctor test. Each lift will be tested at one (1) density test per 1,000 square feet (100'X100') to confirm the required density has been achieved, prior to constructing the next lift. Any cap area that does not meet the density requirements will be re-worked until required density is achieved. Once the cap construction is completed, a 4" layer of topsoil will be placed over the area and compacted to 85% density on the Standard Proctor Test. The topsoil will act as a seed bed for vegetation. The topsoil will be prepared (disked, fertilized, etc.), a mixture of grass and clover seed will be planted and then the area strawed to prevent erosion.

The cap area will be inspected weekly and after each major rain event (greater than 0.5") until the vegetation is established, then monthly, thereafter, for one (1) year after completion of the cap. Long-Term monitoring of the cap area is presented in Section 8.0 of this FCAP.

2.6 Protection of Existing Wetlands

Wetlands are located on the portion of the site designated the Harreld Family Trust Property (e.g. northern portion, the 112 acres), as well as a small wetlands area on the site designated the Former Gulfport Fertilizer property, the original 33 acres (Figure 5). The existing wetlands have served a very valuable function at this site. It is suspected that the wetlands have prevented contaminated soil from the Original Gulfport Fertilizer Site from migrating off-site. The wetlands will continue to provide this valuable function in the future and are, therefore, to be protected. The limits of the wetlands will be delineated, surveyed and included in the proposed Use Restriction Documentation. Should a future user of the property need to cross the wetlands, they will be required to receive the proper permit from the U.S. Corps of Engineers, Mobil District, the Mississippi Department of Marine Resources and the MDEQ. Additionally, they will be required to present their plans to MDEQ, Uncontrolled Sites to gain approval and modification of Use Restriction associated with wetlands.

2.7 Stormwater Run-off Controls

Stormwater run-off controls will be constructed prior to constructing the 10" clay cap (Section 2. 6). Ditches will be constructed outside the cap area to intercept and redirect stormwater runoff from the remainder of the existing sites. The cap area will be graded to direct stormwater runoff from the 10" clay cap to the ditches. Silt fencing will be installed along the ditches and along the

top bank of the diversion ditches to control erosion and minimize silt entering the sediment ponds.

Sediment ponds will be constructed at the terminus of each diversion ditch (Figure 6). The sediment pond will have a 24-inch corrugated metal, slotted riser pipe with an 18-inch corrugated metal outfall pipe. The riser pipe will be wrapped with geotechnical fabric to filter as much sediment as possible out of the stormwater before discharging through an 18-inch corrugated metal pipe into the adjacent wetlands. At high flows, the stormwater will flow over the west end of the sediment pond into the wetlands. The sediment ponds will be inspected and, when significant sediment collects in the pond, the pond will be cleaned. The sediment will be placed within the cap area and vegetated.

2.8 Health and Safety Issues

A Health and Safety Plan was included with the ICAP, which was approved March 19, 2008. All on-site work proposed under this FCAP will be performed in accordance with that approved Health and Safety Plan.

3.0 SYSTEM COMPONENTS

None of the proposed Final Corrective Action Measures include system components.

4.0 SCHEDULE

The schedule for implementing the *Final Corrective Action Plan* is shown below.

Final Corrective Action Measure	**Completion after MDEQ Approval of Final Corrective Action Plan (Calendar Days)**
Use Restriction	30 days after receipt of "Draft" Use Restriction Document from MDEQ, including surveys showing Limits of Soil and Groundwater Contamination per Figure 3. Survey showing limit of cap shall be included 60 days after cap completed.
6-foot Security Fence	Installed during Capping Operations.
On-Site NORM Contamination	Covered during Capping Operations. Will be included in survey of cap to be attached to Use Restriction
Monitoring Well Installations and Monitoring	Monitoring Wells installed. Will be sampled semi-annually for 3 years after completion of Capping Operations.
Capping of Arsenic/Lead Contaminated Soil	6 months after Approval
Protection of Existing Wetlands	In accordance with Use Restriction
Stormwater Run-off Controls	Installed during Capping Operations
Health and Safety Plan	Completed and Approved

5.0 REMEDIAL GOALS (RGs)

The remedial goals for the *Final Corrective Action Plan* are background levels of arsenic naturally occurring in the soil in the area of the site and the Tier 1 Target Remedial Goals (TRGs) established by the MDEQ for lead in soil on restricted use sites (commercial/industrial sites) and arsenic and lead in groundwater. For soils the remedial goals (RGs) are:

Arsenic in soil – 7.18 mg/kg (background), and

Lead in soil – 1,700 mg/kg (restricted use).

Additionally, testing performed under Site Characterization Studies have shown that soils having a lead concentration greater than 3,800 mg/kg are potentially hazardous (TCLP > 5.0 mg/l). Under implementation of the approved *Interim Corrective Action Plan*, soils having a concentration of 3,800 mg/kg of lead or greater have been excavated, treated (where necessary) and disposed at a permitted non-hazardous landfill, except for those soils located in the wetlands.

The RGs for groundwater are:

Arsenic in groundwater – 0.010 mg/l and

Lead in groundwater – 0.015 mg/l.

A groundwater study conducted during the Site Characterization investigation concluded that the contaminated groundwater is confined to the site and is not significantly increasing in

concentration or horizontal extent. Additionally, there are no potable water supply wells on the site or the surrounding area. It is anticipated that city water will be supplied to the site should any future development occur. Initial two rounds of sampling on the additional monitoring wells installed at the site show area of contaminated groundwater to be significantly smaller in area than estimated on Figure 3. Therefore, the *Final Corrective Action Plan* proposes semi-annual monitoring of the on-site monitoring wells for three (3) years after the 10" clay cap is installed. It is anticipated that an analysis of all of the groundwater data, at that time, will indicate that the groundwater contamination is not migrating nor significantly increasing is size.

6.0 OPERATION AND MONITORING PLAN

Given the activities summarized in Section 2.0, an operation and monitoring plan (O&M) is not required since no operating systems are proposed at this time. A Performance Monitoring Plan for final corrective activities proposed is presented in Section 7.0 and in more detail under separate cover.

7.0 PERFORMANCE MONITORING PLAN

In order to ensure that the engineering and institutional controls proposed under the approved *Interim Corrective Action Plan* have been effective in meeting the Remedial Goals (RGs) presented in Section 5.0, the following activities contained in the Performance Monitoring Plan were implemented in 2008. The following is a brief summary of activities. A complete report of the interim corrective activities (excavation, soil stockpiling, analytical data, processes, procedures, site photographs, etc.) will be submitted separately to MDEQ.

7.1 Monitoring Wells

All on-site monitoring wells (14) have been sampled within fifteen (15) days of completing the installation of the seven (7) new monitoring wells presented required under the approved ICAP, following sampling procedures established under the *Work Plan for Off-Site/Source Area Soils and Groundwater Sampling*, approved by MDEQ. A groundwater sampling report will be prepared and submitted to MDEQ for this sampling round on January 31, 2008. The groundwater monitoring system (e.g. the fourteen monitoring wells) was sampled in December 2008 with the results to be submitted in late January 2009. Both groundwater sampling events show the groundwater contamination remains onsite, has not migrated and is not significantly increasing in size or concentration.

7.2 Excavation of Lead-Contaminated Soil above 3,800 mg/kg

The areas of soil with a Lead concentration greater than 3,800 mg/kg had been identified during previous investigations. There were five areas identified to be excavated. These areas were located just north and west of the concrete slab in the center of the original Gulfport Fertilizer property. There was little to no site preparation required, except re-establishing the limits of excavation, as established during previous investigations. Any removed vegetation was placed in the soil stockpile area where excavated soils were stored, characterized, treated as necessary, and disposed.

The previously identified areas to be excavated were in areas of the site where no known utilities were located. Previous sampling activities during the characterization process had confirmed that no utilities were located in these areas. As a precaution, Mississippi One Call was contacted prior to implementing excavation and soil handling activities as part of the Interim Corrective Action Plan. Various utility providers confirmed that no underground utilities existed in the previously identified areas to be excavated.

The identified areas to be excavated were marked with stakes and flagging to notify unauthorized personnel not to enter the area.

Temporary storm water control measures were implemented to prevent storm water from entering the areas being excavated, the soil stockpiles and treatment areas. These measures included diversion ditches and silt fencing.

A soil stockpile storage area, measuring approximately 75' by 100' was constructed near the front gate on the southern portion of the property. The stockpile was placed in the southern portion of the property, because it is topographically "high ground" and facilitated truck transport. The area within the diversion ditches were overlaid with two (2) layers of 6-mil polyethylene sheeting. The joints in each layer of sheeting were overlapped, at least 12" and secured with spray adhesive. The diversion ditches were sloped so any rainwater within the diversion ditches would run towards the storage stockpile area. As an added precaution, the excavated soil stockpiles were covered with plastic until characterization analyses showed the soil stockpile could be disposed in an off-site permitted landfill as a non-hazardous material or required on-site treatment to render it non-hazardous prior to disposal in an off-site permitted landfill as a non-hazardous material.

Area air monitoring (background, both upwind and downwind) were performed during initial excavation activities. In addition, the construction workers most likely exposed (e.g. backhoe operator) to the soil during excavation wore personnel monitoring pumps, in accordance with the approved Health and Safety Plan. The analytical results of the area and personnel air monitoring were well below the OSHA time-weighted average for arsenic and lead. Dust control measures

during excavation were not needed since ample rain showers during site activities prevented any fugitive dust emissions. Level D personnel protection was the appropriate level for site workers based on low dust conditions and the area and personnel air monitoring data from the initial monitoring.

Characterization sampling and analyses were conducted on the stockpiled soil so decisions could be made whether the soils could be disposed as non-hazardous material or required on-site treatment to render the soils non-hazardous. Each characterization sample from the individual soil stockpiles consisted of ten (10) discrete grab samples. The discrete samples collected were placed in a properly decontaminated mixing bowl and then thoroughly mixed using EPA's "Quarter Method" to form one representative composite sample for each stockpile. The composite soil samples were placed in an appropriate container. The container label was marked with all of the necessary information regarding the sample, as prescribed in SW-846, Test Methods for Evaluating Solid Waste, Physical/Chemical Test Methods, 3rd Edition (USEPA 1986). Collection of a sample initiated the Chain-of-Custody process. The completed chain-of-custody form included information regarding the sample type, sampling location, date and time of collection, type of container, preservative, and the name of the person collecting the sample. All samples collected and labeled were then transferred to a cooler, with ice to maintain 4° C. The samples were shipped via Federal Express for next morning delivery to Environmental Science Corporation (ESC) in Mt. Juliet, Tennessee for Total Characteristic Leaching Procedure (TCLP) analyses for arsenic and lead.

A total of ten (10) soil stockpiles (e.g. approximately 1,000 cubic yards of soil) were excavated from the five identified areas on the property. Seven (7) of the ten (10) soil stockpiles exceeded TCLP regulatory limits for either arsenic or lead. The seven (7) soil stockpiles were treated on-site following a Waste Analysis Plan (WAP) submitted to and approved by MDEQ. The soil stockpiles requiring treatment were mixed with Enviro-Blend, a priorteriary additive that has been shown to make many heavy metals (e.g. lead and/or arsenic) containing soils non-leachable, so the soils can be classified as a non-hazardous waste. A treatment area and stockpile area for treated soil piles was constructed in a similar manner as the original soil stockpile area. Three (3) soil stockpiles (e.g. in the original soil stockpile area) were shown to be non-hazardous and were disposed off-site in a permitted landfill as a non-hazardous material.

Once the initial "limits of excavation" of the identified area had been excavated, clearance soil samples were collected from the bottom and sidewalls of the excavated areas. These samples were analyzed for total lead concentrations to determine if the remaining unexcavated soil was above or below 3,800 mg/kg total lead. One composite soil sample was collected from every 1,000 square feet of area in the bottom of the excavation and one composite soil sample was collected for every 100 linear feet of sidewall excavation. Each sample was composited into a sample consisting of soil collected from eight (8) to ten (10) discrete locations within the sampling area. Each soil sample was collected within 2 inches of the soil surface. The soil collected from the eight (8) to ten (10) sampling locations within a sampling area were mixed into a composite sample utilizing EPA's "Quarters Method" of mixing. If an analyzed sample

showed an excavated area to be above 3,800 mg/kg, that area was excavated and re-sampled until the remaining, unexcavated soil was less than 3,800 mg/kg. All identified areas passed the 3,800 mg/kg total lead criteria with the first excavation pass (e.g. 18"); except for one portion of one area requiring a second 18" excavation pass.

Once clearance/confirmatory sampling had shown all lead containing soils greater than 3,800 mg/kg total lead had been excavated and once all excavated, stockpiled material had been shipped to a permitted landfill for disposal, the soil stockpiles area were dismantled and disposed. The polyethylene sheeting was folded in, so as to prevent any soil or water from falling on the "clean" soil below the sheeting. The used polyethylene sheeting was placed in a lined, dump truck for delivery to a permitted, non-hazardous landfill along with excavated soil. Confirmatory soil samples were taken of the native soil under the polyethylene sheeting following the soil stockpiling procedures and frequency presented above. All analytical results of native soil sampled under the polyethylene sheeting in the soil stockpile area were very low and did not require any excavation.

All equipment used during the soil excavation and handling activities that had come in contact with potentially contaminated soil were decontaminated before leaving the site. The equipment was steamed and washed and the rinseate water was used in the last soil stockpiles to be treated.

The previously identified excavated areas were backfilled with clean, off-site soil (soil with total lead concentration less than 1,700 mg/kg). Twelve-inch (12") layers of backfill were placed in the excavation areas and compacted to the density of the adjacent, unexcavated soils. The excavated area were roughly graded to prevent ponding of rainwater and to promote drainage. The off-site soil backfill was sampled and analyzed for total lead and arsenic. The analytical results showed the off-site soil backfill contained very low concentrations for total lead and arsenic.

7.3 Health and Safety Plan

The approved Health and Safety Plan was followed by the construction workers implementing the approved ICAP.

8.0 COMPLIANCE MONITORING PLAN

The following compliance monitoring plan will be implemented to insure that the identified groundwater contamination has stabilized or will not migrate off the site.

- The on—site groundwater monitoring well system (total 14 monitoring wells) will be sampled semi-annually for three (3) years after this Corrective Action Plan is implemented.
- During the sampling of each monitoring wells, water level readings will be collected. The monitoring well will then be purged until field parameters (temperature, conductivity, pH and turbidity) have stabilized before sample collection.
- A groundwater sample will be collected from each monitoring well and analyzed for lead and arsenic. A minimum of four (4) "blind" duplicate samples will be collected during each sampling round.
- Within sixty (60) days following each sampling round, a groundwater report will be prepared and submitted to the Owner and MDEQ. The report will present data collected during the sampling round (groundwater elevations, field parameters and analytical data) as well as drawings showing the groundwater elevations, limits of arsenic contamination and limits of lead contamination for the sampling round and previous sampling rounds. The report will present conclusions and recommendations concerning the groundwater conditions, especially if a statistically significant change occurs.

- If a statistically significant change occurs or if the perimeter monitoring wells are breached, the Contingency Plan presented in Section 9.0 will be implemented.

The following compliance monitoring plan will be implemented for the 10" clay cap area.

- Annually for five (5) years after the 10" clay cap is completed, the clay cap area will be inspected. The inspection will determine the condition of the security fence, the condition of the clay cap (vegetation is established, minimal erosion occurring, ditches and erosion control measures are operating properly and sediment ponds are functioning properly). Photos documenting the conditions of the area will be taken and included with a letter report to the MDEQ.
- Any site condition that affects the integrity of the 10" clay cap will be reported, along with recommendations for addressing the site condition, to MDEQ. The recommendations for improving the site condition will be implemented within forty-five (45) days of MDEQ's approval of the report's recommendations.

9.0 CONTINGENCY PLAN

Should the Compliance Monitoring Plan presented in Section 8.0 show a statistically significant trend or shows the groundwater contamination plume to potentially be migrating off-site, the following Contingency Plan will be implemented.

- An additional sampling round will be collected to confirm the change in the statistically significant trend. If the data from the additional sampling round confirms that a statistically significant trend change has occurred, sampling of all the on-site monitoring wells (14 total) will be performed quarterly for one year (4 additional rounds) to gain more knowledge about the trend change.
- If necessary, Additional monitoring wells will be installed on the site to monitor the trend change or migration of the groundwater contamination plume.
- A report will be prepared and submitted to MDEQ with recommendations for addressing the changed groundwater condition and for keeping the groundwater contamination plume on the site (not allow the plume to migrate off-site). The recommendations would include long-term monitoring of measures taken to prevent the groundwater contamination plume from migrating off-site.

APPENDIX A

SITE FIGURES

FIGURES

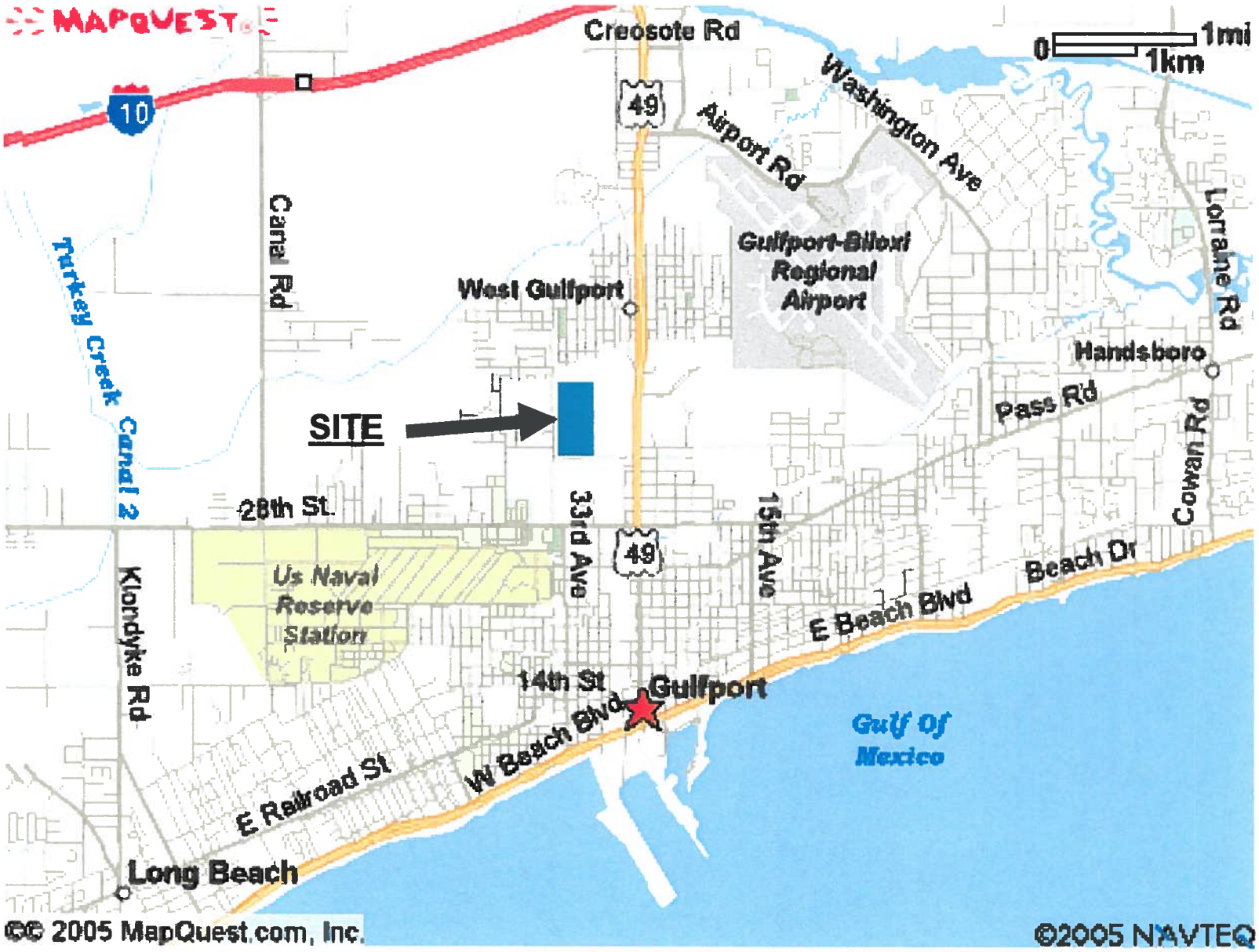


Figure 1
SITE LOCATION

HANCOCK BANK OWNED PROPERTY
TOTAL AREA- 145.721 ACRES

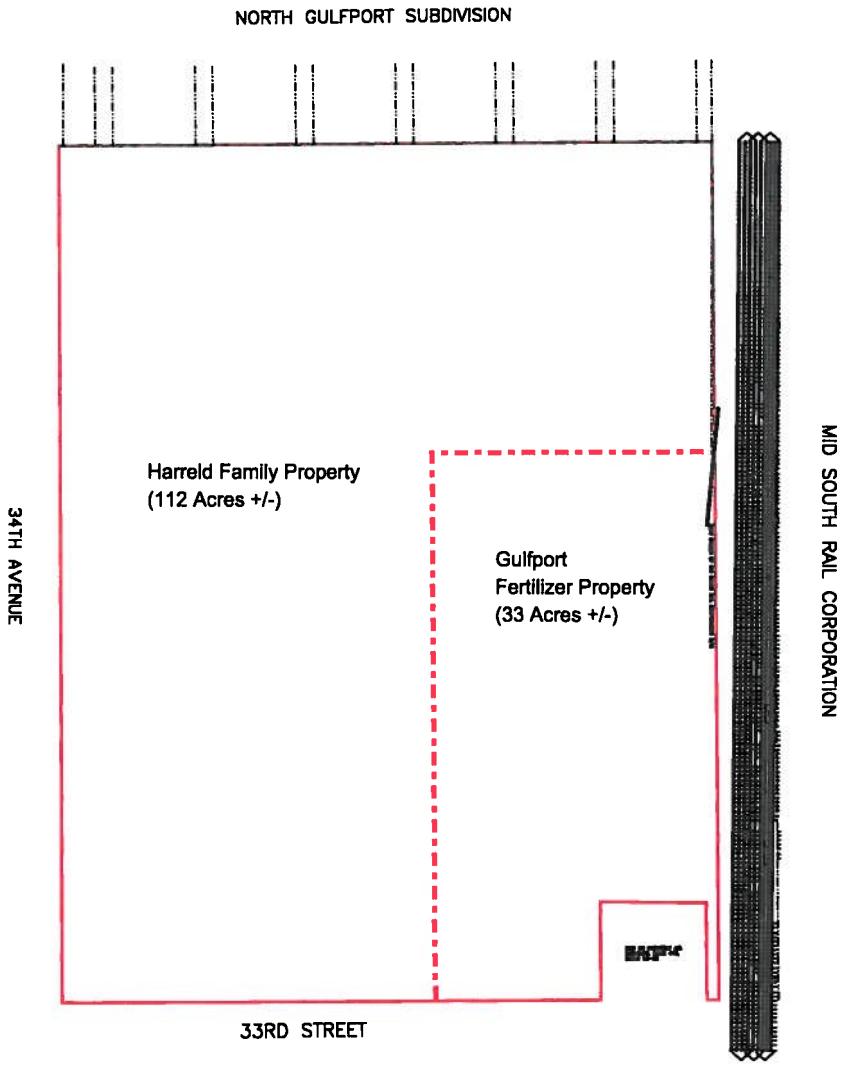


Figure 2
PROPERTY

HANCOCK BANK OWNED PROPERTY
TOTAL AREA- 145.721 ACRES

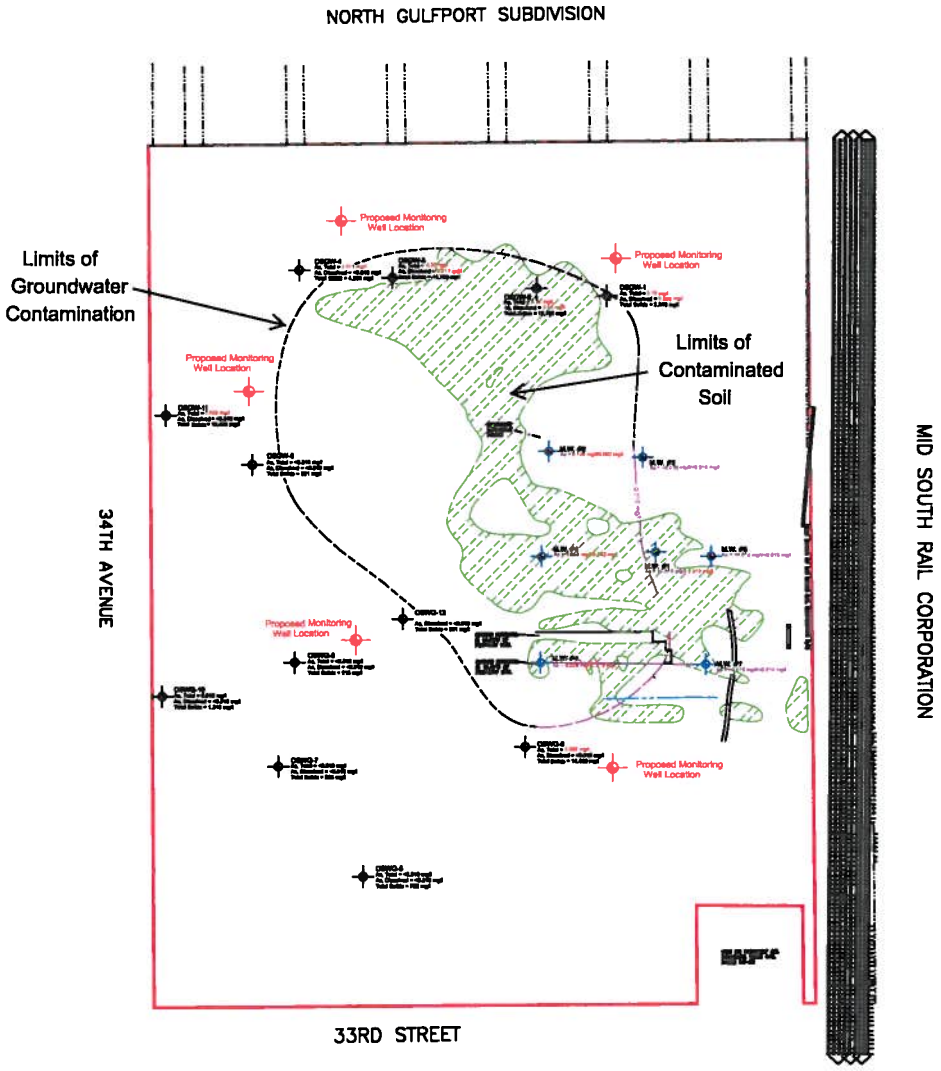


Figure 3
SOIL AND GROUNDWATER
CONTAMINATION

HANCOCK BANK OWNED PROPERTY
TOTAL AREA- 145.721 ACRES

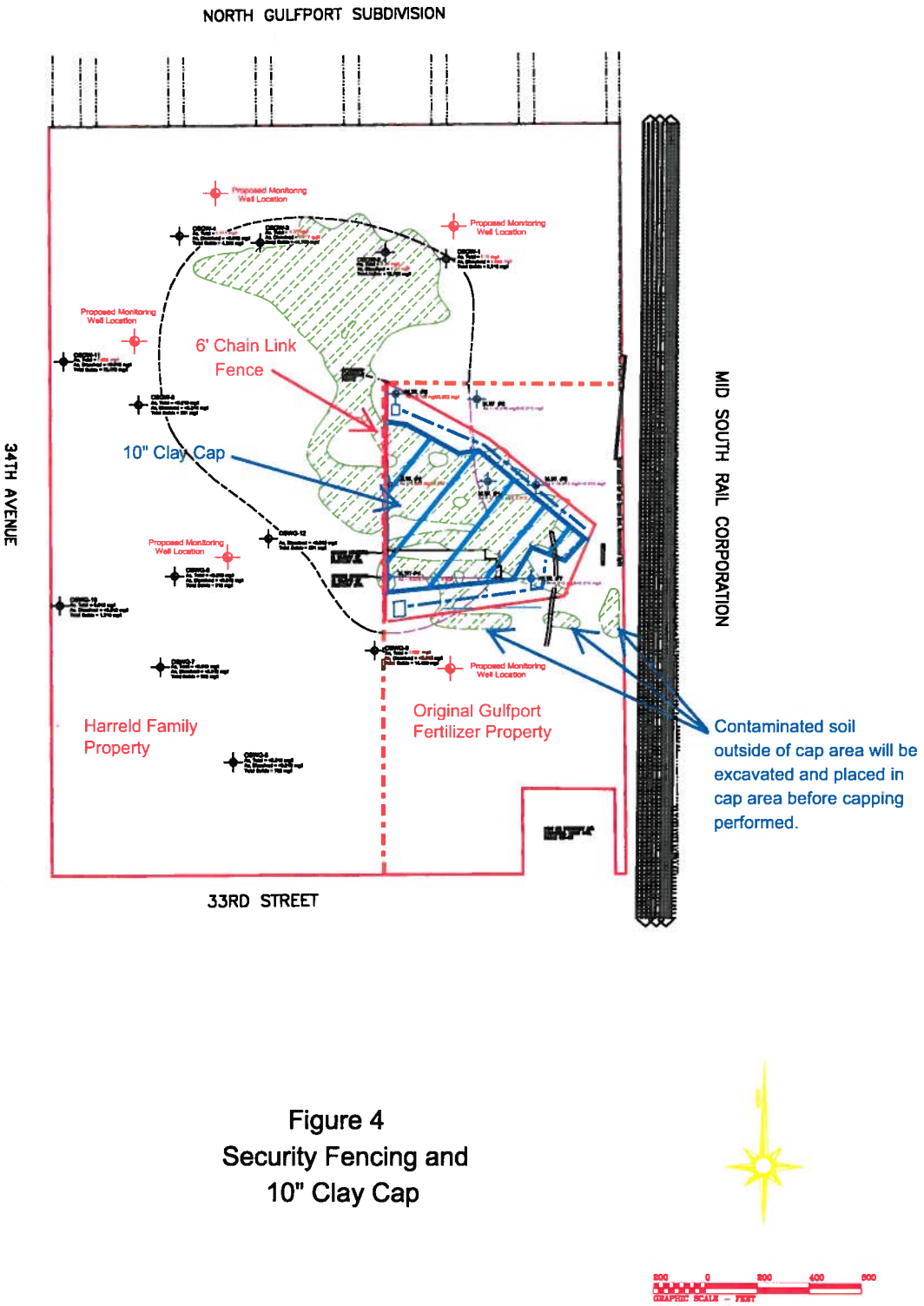


Figure 4
Security Fencing and
10" Clay Cap

HANCOCK BANK OWNED PROPERTY
TOTAL AREA- 145.721 ACRES

High Quality Wetlands
Medium Quality Wetlands

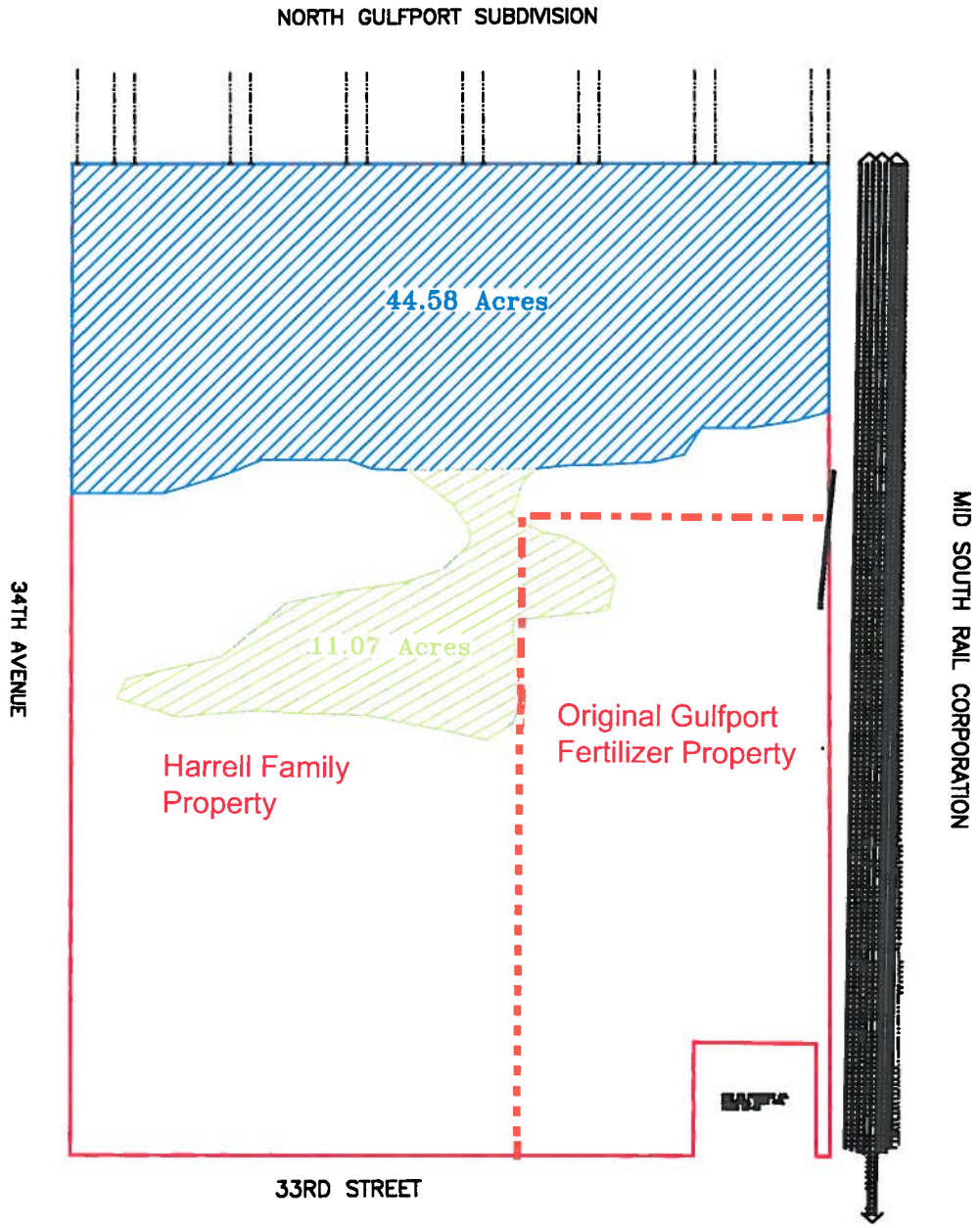


Figure 5
Existing Wetlands

HANCOCK BANK OWNED PROPERTY
TOTAL AREA- 145.721 ACRES

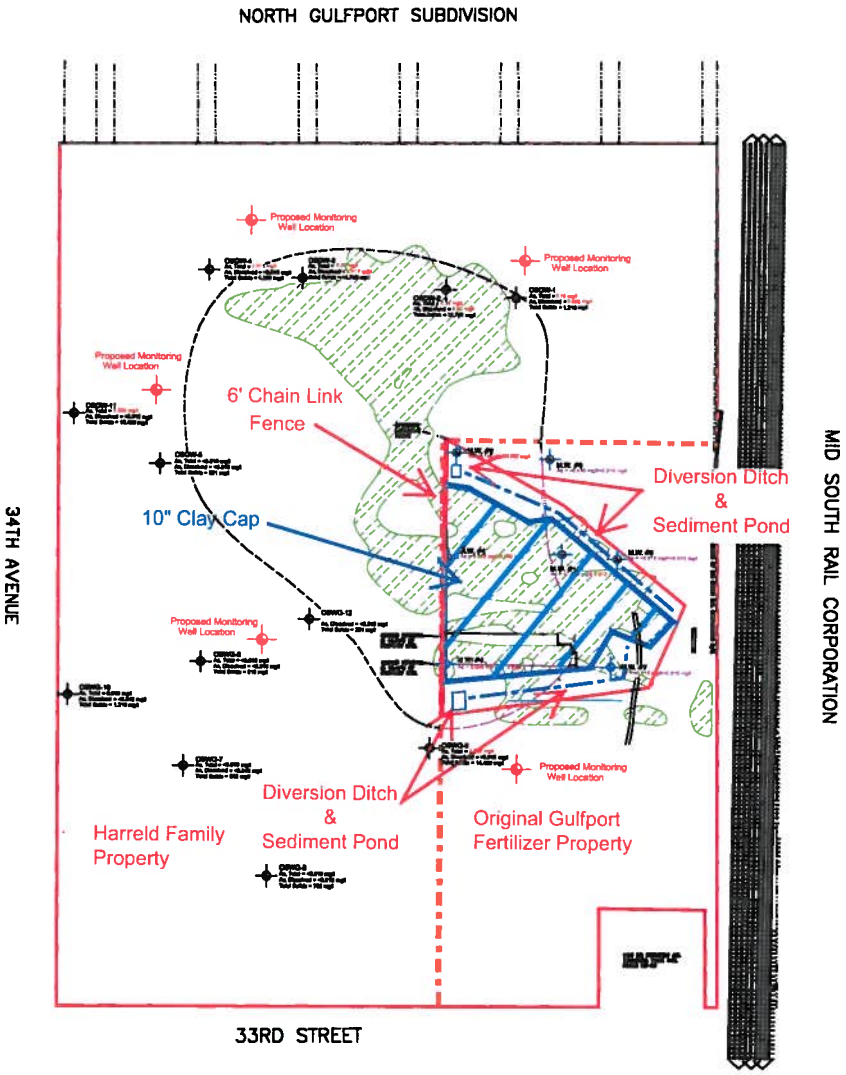


Figure 6
Stormwater Run-Off
Controls

COVINGTON CIVIL & ENVIRONMENTAL, LLC

14257 Dedeaux Road, Suite B
Gulfport, MS 39503

PHONE: 228-396-0486
FAX: 228-396-0487
E-MAIL: tony@covingtonassociates.net

February 3, 2009

Ms. Kayra N. Johnson, P.E.
Environmental Engineer / Project Manager
Groundwater Assessment & Remediation Division (GARD)
Mississippi Department (MDEQ)
PO Box 2261
515 East Amite Street
Jackson, MS 39225 (39201)

Via Email

Re: Response to MDEQ comments
Submitted Final Corrective Action Plan (FCAP)
Former Gulfport Fertilizer
Gulfport, Mississippi

Dear Ms. Johnson:

Covington Civil & Environmental, LLC (CCE) has reviewed MDEQ's January 23, 2009 comments for the previously submitted (January 16, 2009) FCAP for the Gulfport Fertilizer site (subject property). Our client, Hancock Bank and the potential purchaser of the subject property, are in final negotiations for the purchase of the property and the approval of the FCAP is a vital part of that negotiation. Therefore, we are submitting this response to MDEQ's comments of January 23, 2009 in hopes that MDEQ will grant conditional approval of the previously submitted FCAP. Our response comments are as follows:

Section 2.1 - Use Restriction

Comment: Kayra Johnson will be sending a separate email with a draft Restrictive Use Agreed Order (RUAO). The order cannot be finalized until the area to be restricted has been surveyed and we have received a copy of the survey plat. Also a map that shows the basic areas that will be included in the restricted order should be included.

Response: CCE, Hancock Bank and the potential purchaser will review the draft Restrictive Use Agreed Order (RUAO) and will submit any comments and clarifications. A survey plat of the limits of the remaining contaminated soil will be completed as soon as the remaining

contaminated soils outside the protected wetlands areas are consolidated and the 10" clay cap is installed. CCE anticipates that the 10" clay cap installation and surveying will be completed by Mid-May 2009. The limits of the contaminated groundwater plume from the most recent groundwater sampling round (December 2008) will also be surveyed in and submitted with the survey of the contaminated soil.

Section 2.2 Security Fencing

Comment: The RUAO specifies the language that should be placed on the signs to be placed on the restricted area.

Response: CCE will put signs with the language specified in the agreed to RUAO on the proposed security fence.

Section 2.3.1 Proposed Long Term GW Monitoring

Comment: We (MDEQ) agree with the sampling of all 14 wells on a semiannual basis for a total of 3 years. As long as contamination is present in the groundwater, sampling will be necessary to ensure the plume is not migrating offsite. At the end of the first 3 years, it may be possible to reduce the number of wells and frequency of sampling to 3 year rotation. A proposal outlining which wells will be included in the reduced sampling schedule should be submitted for approval prior to the event. Based on the data obtained, the frequency of sampling can be reduced as needed from that point forward. Also a map outlining the wells to be sampled in the semiannual rotation and those to be sampled thereafter should be included in the CAP.

Response: CCE is in agreement that the complete monitoring well system (e.g. 14 monitoring wells) will be sampled semiannually for a period of three (3) years. CCE proposes to collect groundwater samples from five (5) monitoring wells (MW-1, MW-2, MW-8, MW-11 and MW-12) along the long axis of the groundwater plume that runs southeast to northwest. These five (5) monitoring wells will be sampled once every three (3) years for two (2) additional rounds of sampling (e.g. a total of six years). CCE proposes that if, after nine (9) years of monitoring, the groundwater plume remains unchanged and the potential purchaser has <u>not</u> replaced the 10"

clay cap with pavement (asphalt or concrete) that monitoring of these same five (5) monitoring wells be conducted once every five year until final closure is obtained. A map highlighting the monitoring wells to be sampled after semiannual for three (3) years will be included in the FCAP.

Section 2.5 Capping of Contaminated Soil

Comment: The plan does not specify the size of the acreage of the area that will be disturbed during the capping process. Depending on the size of the area to be disturbed, it may be necessary to seek coverage for the project under either a Small Construction or Large Construction stormwater permit. The guidelines for these stormwater permits are found on our website at the following link:

http://www.deq.state.ms.us/MDEQ.nsf/page/epd_epdgeneral?OpenDocument

Should you have any questions regarding the stormwater coverages, please feel free to call Tim Parrish with the Environmental Permits Division at 601-961-5169.

Response: CCE estimates the area that will be disturbed during the proposed soil consolidation and capping activities to be approximately 6 acres. The size is greater than five acres therefore, a Large Construction stormwater permit will be required for the activities proposed by the FCAP. CCE will obtain the required stormwater permit and develop a stormwater pollution prevention plan (SWP3) to govern the project.

Section 7.0 Performance Monitoring Plan

Comment: We (MDEQ) need a submittal date for the report outlining the work done under the Interim Corrective Action Plan.

Response: CCE will submit the Performance Monitoring Report to MDEQ on or before Tuesday, February 10, 2009.

Section 8.0 Compliance Monitoring Plan

Comment: It is our understanding that once the clay cap is completed, it will be inspected annually for five years. It is necessary to outline what measures will be taken on an ongoing basis to ensure that trees, etc do not penetrate the clay cap.

Response:

Initially, for the first year after the 10" clay cap is installed, the clay cap will be inspected monthly or after each significant ran event (>0.5") to inspect for rainwater washouts, cracks, erosion, etc. Repairs will be made within seven (7) days. After the first year when the clay cap has stabilized and the vegetation has provided adequate coverage, the clay cap will be inspected annually for five years. The annual inspection will include a visual inspection documenting any integrity breaks in the cap (e.g. rainwater washouts, cracks caused by soil wet/dry cycle, and breakthroughs caused by plant growth). Any integrity breaks in the clap will be corrected within 45 days of discovery.

If you have any questions, do not hesitate to contact either Tony Damiano or John Szabo at (228) 396-0486.

Respectfully,
COVINGTON CIVIL & ENVIRONMENTAL, LLC

Anthony P. Damiano Jr

Anthony P. Damiano, Jr.
Senior Consultant

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

January 6, 2009

Hancock Bank of Gulfport MS
Attn: Jay Lambert-Phillips
P. O. Box 4019
Gulfport, MS 39502-4019

Re: Voluntary Evaluation Program Account Balances,
Administrative Order 5503 08

Dear Mr Phillips:

Enclosed please find a copy of Administrative Order 5503 08 which was issued on December 18, 2008. The Order will allow the Department to apply the existing account balance to future invoices related to each respective site. Should you have any questions or comments pertaining to this Order please direct them to Mona Varner at (601) 961-5572.

Sincerely,

A. Bryan Smith, III
Senior Attorney
Mississippi Department of Environmental Quality

ABS:lmj

Enclosure

cc: Mona Varner
Tony Russell

BEFORE THE MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY — **COMPLAINTANT**

In Re: VOLUNTARY EVALUATION PROGRAM ACCOUNT BALANCES

ORDER NO. 5509 09

AIR LIQUIDE USA, LLC
PECO FOODS
CHEVRON ENVIRONMENTAL MANAGEMENT
CORPORATE CAPITAL, LLC
EKA CHEMICALS, INC
ENPRO INDUSTRIES
FARMER'S SUPPLY CO-OP
FIRST ENVIRONMENT
HANCOCK BANK OF GULFPORT
HELMITIN, INC
INTIER SEATING
MISSISSIPPI POWER COMPANY
MTD PRODUCTS, INC
PLANTATION PIPELINE COMPANY
TENNECO AUTOMOTIVE
TIMBER PRODUCTS COMPANY
TRONOX, LLC
URS CORPORATION

ORDER

The above captioned matter came before the Executive Director of the Mississippi Department of Environmental Quality (MDEQ) this day for ex parte consideration under the authority of Miss. Code Ann. § 49-2-13 (Rev. 2003), and the Executive Director, having heard and considered the evidence therein, and having determined that an Administrative Order should issue prefatory to any evidentiary hearing and without making any final adjudication of fact or law, finds as follows:

1.

The Voluntary Evaluation Program ("VEP") is a program administered by MDEQ which allows participants to voluntarily remediate their site with MDEQ oversight. Currently, the account has an advanced balance of $33,820.00. This balance represents funds deposited by each listed Respondent to assess, remediate and/or perform necessary work on the respective site in order to bring it into full compliance with the applicable laws of the State of Mississippi and the rules and regulations of the Mississippi Commission on Environmental Quality.

2.

Each participant in the VEP has an advance balance in the VEP account that was created as each participant entered the VEP program. The participants in the VEP program continue to incur expenses in participating in the VEP program that are billed to them monthly by MDEQ.

3.

MDEQ shall have the authority and right to apply any remaining balance as of January 1, 2009, for each respective Respondent related to each Respondent's future invoices in the VEP fund applicable to Administrative Orders: 3658-98; 4323-00; 3388-97; 3697-98; 3667-98; 3482-97; 3680-98; 3681-98; 3682-98; 3746-98; 3359-96; 3699-98; 3826-99; 3755-99; 3460-97; 3733-98; 3381-97; and 3383-99.

4.

If aggrieved by this Order, Respondent may request a hearing before the Commission by filing a sworn petition with the Commission within thirty (30) days after the date of this Order in the manner set forth in Miss. Code Ann. § 49-17-41 (Rev. 2003).

ORDERED, this the 18 day of December, 2008.

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

BY: _____
TRUDY D. FISHER
EXECUTIVE DIRECTOR
MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL
QUALITY

Mississippi State Senate

SENATOR DEBORAH DAWKINS
District 48
Harrison County
111 Lang Avenue # 3
Pass Christian, Mississippi 39571
228-452-5182

COMMITTEE ASSIGNMENTS:
Environmental Protection, Conservation & Water, Vice Chairman
Investigate State Offices, Vice Chairman
County Affairs
Enrolled Bills
Finance
Insurance
Oil, Gas & Other Minerals
Ports & Marine Resources

August 6, 2008

Mark Williams,
Office of Pollution Control
Mississippi Department of Environmental Quality
515 E. Amite Street
Jackson, Mississippi 39201

Re: Port of Gulfport
Proposed Inland Port Contamination Site

Dear Mr. Williams:

As I was unable to attend meetings in Gulfport last week when this proposed project was reportedly discussed, I am requesting some public records for my review. Please have these documents sent to my office in Jackson within 7 days.

Any and all records or files (including any closed files) on Gulfport Fertilizer Company (or any other company previously located) at 2600 33rd Street, Gulfport, Mississippi. Please include, without limitation, any records or files on any permitting, enforcement, or cleanup activities at that location.

Thank you for your consideration in this matter.

Yours truly,

Deborah Dawkins

Tony Russell

DD/pt

Kayra Johnson/GW/OPC/DEQ
08/26/2008 02:34 PM

To "Tony Damiano" <tony@covingtonassociates.net>@INETDEQ
cc
bcc
Subject Re: Ecological Evaluation Submittal - Brownfield Voluntary Clean-up Program - Former Gulfport Fertilizer Plant Site - 33rd Street, Gulfport, Mississippi

FILE COPY

Tony:

We have reviewed the Ecological Checklist submittal from August 15, 2008 and we have a couple of comments:

Item 1. on the checklist- Area of impacted soil. This section needs to be revised. The area of impacted soil is the total area where lead concentrations are above the Target Remediation Goals (TRG), not just those where the TCLP exceeded 5.0 mg/L

Also, the Final Corrective Action Plan was referenced in this document a few times; specifically in Item 2, last paragraph. It states that much of the original 33 acre site will be paved and capped, and the final CAP would include surface water runoff management guidelines.
What's the status of this final CAP? It was our understanding the site was going to be sold and the new owner would submit the final CAP. I just want to make sure we are up to date regarding that situation.

Thanks

Kayra N. Johnson, P.E.
Environmental Engineer / Project Manager
Groundwater Assessment & Remediation Division (GARD)
MS Dept. of Environmental Quality
PO Box 2261
515 East Amite Street
Jackson, MS 39225 (39201)
Phone: (601) 961-5106
Fax: (601) 961-5300

"Tony Damiano" <tony@covingtonassociates.net>

08/15/2008 10:48 AM

To <kayra_johnson@deq.state.ms.us>

cc "John Szabo" <jfszabo@bellsouth.net>, <delma_powell@hancockbank.com>, <semmons@paragon-ins.com>, "Lars Larson "

bcc

Subject Status of the Gulfport Fertilizer site project in Gulfport, MS

FILE COPY

This email is a follow-up to our telephone conversation earlier today (Friday, 08-15-08) regarding the status of the Gulfport Fertilizer project in Gulfport, MS. As discussed, we have completed treatment on all excavated soils requiring treatment. All treated soils passed TCLP analytical testing. We presently have the treated soil piles covered with plastic and sitting on a covered lay down area. I anticipate loading, transporting and disposing of soils at the landfill (e.g. Pecan Grove Landfill in Pass Christian, MS) the week on August 25, 2008. I'll be getting with our contractors to prepare manifest sheets, trucks, et. al. I will give you a couple of days notice prior to initiating work, so if you wanted to come to the site and observe during out loading to the landfill.

As always, if you or anyone involved with the project has any questions don't hesitate to contact me directly. All my contact information can be found at the end of this email.

Thanks,
APD

Covington & Associates Corporation
Anthony P. Damiano, Jr.
Senior Consultant
1636 Popps Ferry Road
Biloxi, Mississippi 39532
Tel: 228-396-0486
Fax: 228-396-0487
Cell: 228-861-2402

COVINGTON AND ASSOCIATES CORP.
1636 Popps Ferry Road, Suite M-5
Biloxi, MS 39532

PHONE: 228-396-0486
FAX: 228-396-0487
E-MAIL: jfszabo@bellsouth.net

August 5, 2008

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

Re: Ecological Checklist Submittal – Brownfield Voluntary Cleanup Program
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi
CAC Project No. 9397

Dear Mr. Russell:

Covington and Associates Corporation (CAC) is pleased to submit this "Ecological Checklist Submittal" as required by the Mississippi Department of Environmental Quality's (MDEQ's) Risk Evaluation Procedures for Voluntary Cleanup and Redevelopment Program of Brownfield Sites. The Ecological Checklist is included as Attachment #1.

As you are aware, an extensive site investigation program has been conducted by CAC at this site over the past eight years. This program has incorporated numerous soil and groundwater assessment initiatives, a thorough groundwater evaluation and monitoring program, and most recently, remedial actions that have removed areas of lead impacted soil from the site as described in the approved "Interim Corrective Action Plan" (ICAP), as revised February 8, 2008. Now that the majority of the work under the ICAP has been completed, this Ecological Checklist is being submitted to show, based on these previous investigations and our knowledge of the site and future uses of the site, that wildlife and other environmental receptors on and adjacent to the Former Gulfport Fertilizer site will not be impacted as a result of the proposed long-term use of this land. A USGS Topographic Quadrangle Map showing the location of the former Gulfport Fertilizer site is included as Figure 1. The following information addresses Section 4 (criteria for exclusion from further ecological assessment) of the Ecological Checklist Form included in the Voluntary Cleanup Program.

1. ***The area of impacted soil is approximately 1-acre or less in size.*** The total area of soil with lead concentrations exceeding the 3,800 mg/kg limit is less than 1-acre. As discussed in Section 2.4 of the approved ICAP, the portions of the site that represented a potential threat to soil and/or groundwater were areas previously identified as having total lead concentrations greater than 3,800 mg/kg. Previous statistical analysis, reviewed and approved by MDEQ, demonstrated that the areas where total lead concentrations exceeded 3,800 mg/kg were also likely to exceed the 5.0 mg/L Toxicity Characteristic Leachate Procedure (TCLP) limit that characterizes a material as a hazardous material/waste. As of this date, the areas of the site that exceeded the 3,800 mg/kg limit for total lead have been excavated. The sum of the acreage of each of the four identified areas impacted by lead totaled 0.9-acres. Since this material has now been removed and is in the process of being treated and disposed, these areas no longer pose a threat to the environmental receptors.

2. ***There is no current (or potential) release (via runoff or groundwater discharge) of Contaminants of Concern (COC's) from the Area of Interest (AOI) to a surface water body.*** Long-term groundwater monitoring has clearly established that previously identified groundwater impacts remain confined to the Gulfport Fertilizer site's AOI. The data from the long-term groundwater monitoring has been submitted, reviewed and approved by MDEQ. Additionally, conclusions about the conditions of the groundwater contamination based on the data has been presented to and agreed to by MDEQ. The data demonstrates that groundwater impacts are mostly confined to the original 33-acre portion of the Gulfport Fertilizer property and are not significantly migrating. Accordingly, these data confirm that COC's detected in the groundwater are not being released to surface water receptors or to adjacent property.

   Previous site investigations, especially those conducted in 2001 through 2003, identified impacts to the surface soils on and around the perimeter of the original 33-acre site. Additional site investigations conducted between 2003 and 2005 verified that these impacts have been delineated to the greater site AOI, but are still completely contained within the Gulfport Fertilizer property. The surficial soils exceeding lead and arsenic regulatory limits established for this site are mostly located in or adjacent to wetlands areas of the site where there is little to no relief, thus mitigating or drastically minimizing the ability of surface water to transport contaminated soil particles from this area. In essence, this area acts as a large filter/sponge for limiting any potential contamination from entering any other surface water receptor. This conclusion is verified by sediment sampling performed on June 6, 2002. Stream sediment samples were collected from four locations along a stream located adjacent to the west property line of the original 33-acre Gulfport Fertilizer Site. All soil samples were <u>below</u> arsenic and lead limits established for this site. This information was presented in the *Supplemental Site Characterization Report* submitted to MDEQ on November 8, 2002, which was reviewed and approved by MDEQ. Since the stream from which the sediment samples were collected is immediately adjacent to the most contaminated portion of the site, this shows that sediment is not being significantly transported by the surface water on the site.

   Finally, contemplated as part of the Final Corrective Action Plan, much of the original 33-acre site will be paved and capped. In order to appropriately manage surface water run-off from this area, the Final Corrective Action Plan will also include appropriately designed surface water run-off drainage control features, as well as a plan for the periodic assessment of surface water quality to ensure that no COC's are being discharged from the site. Local regulations will require that detention pond(s) be constructed on-site to control runoff from the site. State regulations will require that the site operator obtain both a Storm Water Discharge Permit and Water Quality Certification before any soil disturbance or construction can begin on the site. Implementing the measures required by these permits and approvals along with storm

water control and monitoring procedures presented in the Final Corrective Action Plan will further insure proper management of surface waters on the site.

3. ***Recreational species, commercial species, threatened or endangered species, and/or their habitats are not currently being exposed or expected to be exposed, to COC's present at or migrating from the AOI.*** Attachment #2 is a letter from the Mississippi Department of Wildlife, Fisheries and Parks (DWF) in response to CAC's June 5, 2008 information request regarding threatened and endangered (T&E) species within the AOI. According the DWF, if best management practices are implemented, particularly measures to prevent, or at least, minimize negative impacts to water quality, the proposed project will most likely not pose a threat to listed species or their habitats. As previously mentioned, the Final Corrective Action Plan and local and state approvals and permits for this site will include appropriate storm water run-off measures and surface water quality assessment contingencies to ensure that surface water quality leaving this site is not impacted.

4. ***There are no obvious impacts to ecological receptors or their habitats.*** No obvious impacts to ecological receptors currently exist within the AOI of this site.

SITE SUMMARY

Pursuant to Section 5 of the Ecological Checklist, the following historical site summary is being provided to verify that the AOI of this site meets the criteria for no further ecological assessment.

Industrial operations on the former Gulfport Fertilizer property date back to the early 1900's. Available records document that the production of super phosphate fertilizer was conducted by the Gulfport Cotton Oil, Fertilizer & Manufacturing Company at this site from the early 1900's to approximately 1921. Crushed limestone rock was transported to this facility by rail spurs from the Illinois Central main line, and off-loaded at the primary production building located on the west side of the original site. The fertilizer production process included spraying the crushed limestone with sulfuric acid to leach phosphate from the limestone rock, then capturing the leached phosphate for fertilizer production.

Available documentation reports that this property underwent a succession of owners, including Gulfport Fertilizer in 1928. The property changed ownership several additional times until Hancock Bank obtained the original 33-are site in 1976 through foreclosure. Hancock Bank also acquired the adjacent "Harreld Trust" property in 2005 bringing the total area of the property to approximately 145-acres.

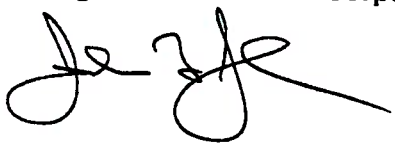
Information presented in a Phase I Environmental Site Assessment (ESA) conducted on this property in 2006 document that the tract of land adjacent to the original Gulfport Fertilizer site (Harreld Trust property) was vacant/undeveloped land dating back to 1942. The 1957 aerial

photograph of the site and other information confirm that this property underwent partial clearing, however no discernable land use activities were noted. Residents living in this area since 1956 verified that cattle grazing took place intermittently on the "Harreld Trust" property as long as they could recall. The Phase I ESA report also confirmed that the primary period when buildings were demolished on the Gulfport Fertilizer site appeared to have occurred between 1981 and 1996.

As discussed in numerous site investigation reports for this site, soil, groundwater and surface water investigations have been on-going at this site since the late 1990's. Each of these site investigation reports provides information that, when added together, provides a comprehensive understanding of the overall extent of soil and groundwater impacts at this site. In lieu of an exhaustive re-submittal of all this information, CAC will refer the reviewers of this document to those reports for specific information as it pertains to soil and groundwater impacts, delineation of impacts, and corrective actions conducted thus far. The information contained in these reports clearly shows that the soil and groundwater impacts on the subject property have been delineated. An Interim Corrective Action Plan has been prepared, submitted, reviewed, approved and implemented and a Final Corrective Action Plan will be submitted for approval and implementation that will not only provide for the long-term protection of the environment (i.e. groundwater, wetlands habitat, human health, etc.), but will also provide a mechanism to return this property to use as an economically viable piece of commercial/industrial real estate with long-term benefits to the City of Gulfport, MS. Accordingly, based on this information and data collected during the extensive site characterization, CAC concludes that additional ecological risk assessments are not warranted for this property.

If you or anyone else involved in this project has any questions regarding any information provided in this submittal, please contact us with any questions.

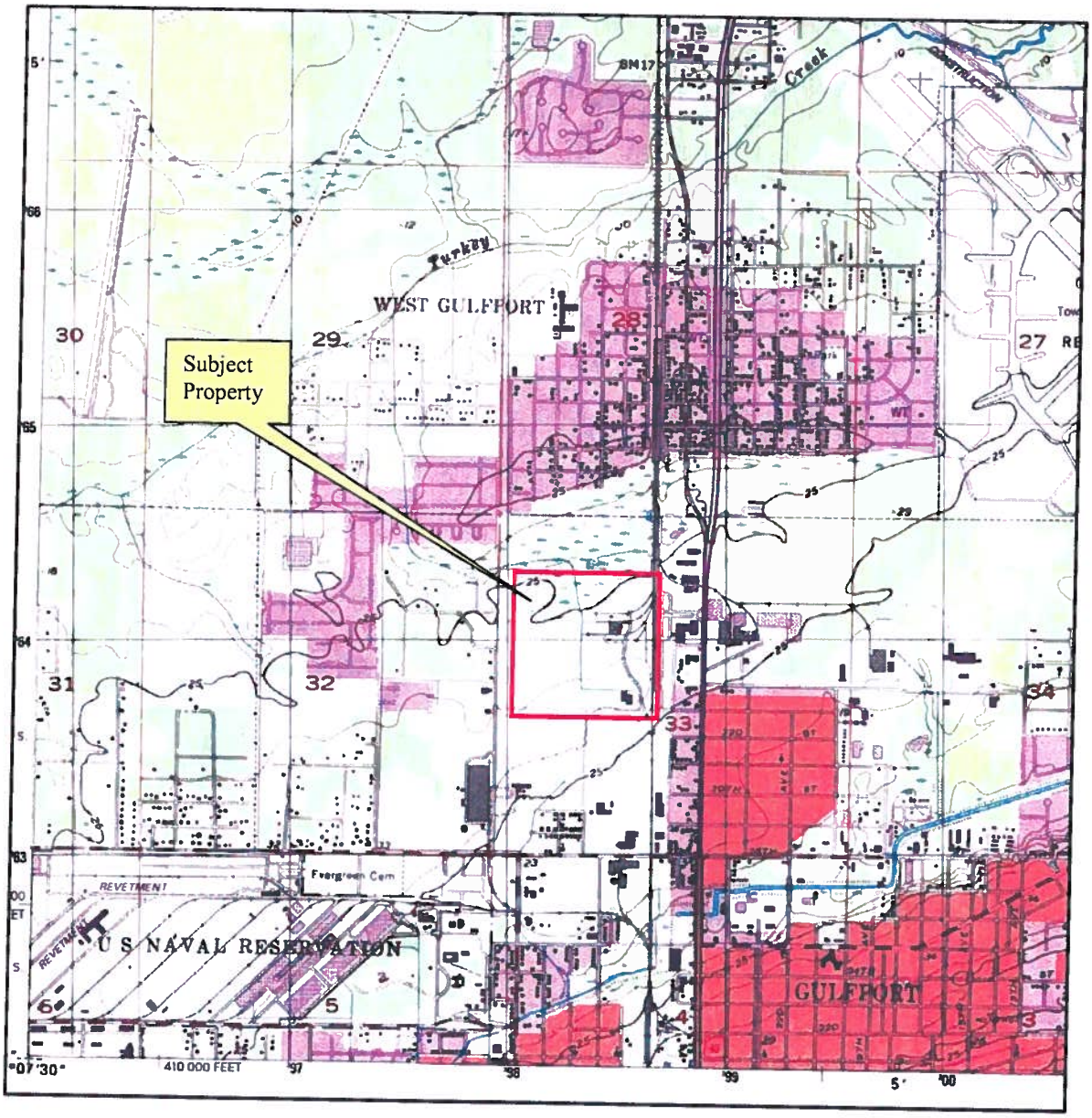
Very truly yours,
Covington & Associates Corporation



John F. Szabo, P.E.
Managing Principal

ENCLOSURES

cc: Mr. Delma Powell, Hancock Bank



Former Gulfport Fertilizer Site
Gulfport, Mississippi

Attachment #1

Ecological Checklist

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
BROWNFIELD VOLUNTARY CLEANUP PROGRAM
ECOLOGICAL CHECKLIST

Section I- Facility Information

1. Name of Facility: Former Gulfport Fertilizer Site
2. Location of Facility: 33rd St. & 34th Avenue, Gulfport, MS
   County: Harrison County
3. Mailing Address:
4. Type of Facility: Former Super phosphate fertilizer production facility
5. Describe land use at and in the vicinity of the release site
   Residential to North and West; Commercial/Industrial to East & South
6. Attach a USGS topographic map of the facility and aerial and other photographs of the release site and surrounding areas.

Section 2-Surrounding Land Use Information

1. Describe land use adjacent to the facility.
   Primarily Commercial/light industrial-Some residential to North & NW
2. Provide the following information regarding the nearest water body:
   Name of surface water body: Turkey Creek
   Type of surface water body (pond, lake, river etc: Perennial Stream
3. Do any potentially sensitive environmental areas exist adjacent to or in proximity to the site, e.g., Federal and State parks, National and State Monuments, wetlands, etc.
   yes – Jurisdictional Wetlands on the site.

Section 3 - Release Information

1. Nature of release. Historical process operations (Fertilizer Production)
2. Location of the release (within the facility) Original 33 Acre Site.
3. Location of the release with respect to the facility property boundaries:
   Central to Northern portion of original 33-acre Site
4. Chemicals of Concern (COC) known or suspected to have been released: Arsenic & lead
5. Indicate which media are known or suspected to be impacted and if sampling data are available:

Soil 0-6 feet bgs	(yes)	no
groundwater	(yes)	no
surface water/sediment	(yes)	no

6. Has migration occurred outside the facility property boundaries? yes (no)
   If yes, describe the designated use of the land impacted:

Section 4 - Criteria for Further Assessment

If the Area of Impact (AOI) meets all of the criteria presented below, then typically no further ecological evaluation shall be required. If the AOI does not meet all of the criteria, then a screening level ecological risk shall be conducted. The Submitter should make the initial decision regarding whether or not a screening level ecological risk assessment is warranted based on compliance of the AOI with criteria listed below. After review of the ecological checklist and other available site information, the Mississippi Department of Environmental Quality will make a final determination on the need for a screening level ecological risk assessment. If site conditions at the AOI change such that one or more of the criteria are not met, then a screening level ecological risk assessment shall be conducted.

The criteria for exclusion from further ecological assessment include: (Please See letter)

The area of impacted soil is approximately 1 acre or less in size;

There is no current (or potential) release (via runoff or groundwater discharge) of COCs from the AOI to a surface water body;

Recreational species, commercial species, threatened or endangered species, and/or their habitats are not currently being exposed, or expected to be exposed, to COCs present at or migrating from the AOI; and

There are no obvious impacts to ecological receptors or their habitats.

Section 5 - Site Summary

The ecological checklist submittal shall include a site summary which presents sufficient information to verify that the AOI meets or does not meet the criteria for further assessment.

Section 6 - Submitter Information

Date: June 2008

Name of person submitting this check list: John F. Szabo

Affiliation: Covington & Associates

Signature

Additional Preparers: Lars Larson

Attachment #2

Mississippi Department of Wildlife, Fisheries and Parks Letter June 11, 2008

MISSISSIPPI
DEPARTMENT OF WILDLIFE, FISHERIES, AND PARKS

Sam Polles, **Ph.D.**
Executive Director

June 11, 2008

Lars Larson
Covington and Associates Corp.
1636 Popps Ferry Road
Suite M-5
Biloxi, MS 39532

Re: Protected Species Data Request
Biloxi, Hancok County, Mississippi **R# 6679**

To Lars Larson:

In response to your request for information dated June 5, 2008, we have searched our database for occurrences of state or federally listed species and species of special concern that occur within 2 miles of the site of the proposed project. Please find our concerns and recommendations below.

Portions of this project site are underlain by hydric soils and may be designated wetlands. If this project is approved, we ask that serious consideration be given to the cumulative impacts of wetland disturbance and elimination.

We recommend that best management practices are implemented and monitored for compliance, specifically measures that will prevent ANY suspended silt and contaminants from leaving the site in stormwater run-off as this may negatively affect water quality and habitat conditions within nearby streams and waterbodies.

Based on information provided, we conclude that if best management practices are implemented, particularly measures to prevent, or at least, minimize negative impacts to water quality, the proposed project likely poses no threat to listed species or their habitats.

Please feel free to contact us if we can provide any additional information, resources, or assistance that will help minimize negative impacts to the species and/or ecological communities identified in this review. We are happy to work with you to ensure that our state's precious natural heritage is conserved and preserved for future Mississippians.

Sincerely,

Andy Sanderson

Andy Sanderson, Research Biologist
Mississippi Natural Heritage Program
(601) 354-6367, ext. 117

The Mississippi Natural Heritage Program (MNHP) has compiled a database that is the most complete source of information about Mississippi's rare, threatened, and endangered plants, animals, and ecological communities. The quantity and quality of data collected by MNHP are dependent on the research and observations of many individuals and organizations. In many cases, this information is not the result of comprehensive or site-specific field surveys; most natural areas in Mississippi have not been thoroughly surveyed and new occurrences of plant and animal species are often discovered. Heritage reports summarize the existing information known to the MNHP at the time of the request and cannot always be considered a definitive statement on the presence, absence or condition of biological elements on a particular site.

"Tony Damiano"
<tony@covingtonassociates.net>
08/06/2008 02:06 PM

To <tony_russell@deq.state.ms.us>, <kayra_johnson@deq.state.ms.us>
cc "John Szabo" <jfszabo@bellsouth.net>, "Powell, Delma" <delma_powell@hancockbank.com>
bcc
Subject Ecological Evaluation Submittal - Brownfield Voluntary Clean-up Program - Former Gulfport Fertilizer Plant Site - 33rd Street, Gulfport, Mississippi

The attached ecological evaluation (e.g. checklist) submittal will illustrate that the Former Gulfport Fertilizer Plant Site will not impact wildlife and other environmental receptors on and adjacent to the site. The attachment is an Adobe (.pdf) file. The attached ecological evaluation is another study to show that the Former Gulfport Fertilizer Plant Site can be beneficially re-used within the community.

As always, if anyone has any questions with the attached don't hesitate to contact us at Covington & Associates Corporation.

Respectfully,

Anthony P. Damiano, Jr.

FILE COPY

Covington & Associates Corporation
Anthony P. Damiano, Jr.
Senior Consultant
1636 Popps Ferry Road
Biloxi, Mississippi 39532
Tel: 228-396-0486
Fax: 228-396-0487
Cell: 228-861-2402

ECO Check package - August 5 2008.pdf

COVINGTON AND ASSOCIATES CORP.
1636 Popps Ferry Road, Suite M-5
Biloxi, MS 39532

PHONE: 228-396-0486
FAX: 228-396-0487
E-MAIL: jfszabo@bellsouth.net

August 5, 2008

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

Re: Ecological Checklist Submittal – Brownfield Voluntary Cleanup Program
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi
CAC Project No. 9397

Dear Mr. Russell:

Covington and Associates Corporation (CAC) is pleased to submit this "Ecological Checklist Submittal" as required by the Mississippi Department of Environmental Quality's (MDEQ's) Risk Evaluation Procedures for Voluntary Cleanup and Redevelopment Program of Brownfield Sites. The Ecological Checklist is included as Attachment #1.

As you are aware, an extensive site investigation program has been conducted by CAC at this site over the past eight years. This program has incorporated numerous soil and groundwater assessment initiatives, a thorough groundwater evaluation and monitoring program, and most recently, remedial actions that have removed areas of lead impacted soil from the site as described in the approved "Interim Corrective Action Plan" (ICAP), as revised February 8, 2008. Now that the majority of the work under the ICAP has been completed, this Ecological Checklist is being submitted to show, based on these previous investigations and our knowledge of the site and future uses of the site, that wildlife and other environmental receptors on and adjacent to the Former Gulfport Fertilizer site will not be impacted as a result of the proposed long-term use of this land. A USGS Topographic Quadrangle Map showing the location of the former Gulfport Fertilizer site is included as Figure 1. The following information addresses Section 4 (criteria for exclusion from further ecological assessment) of the Ecological Checklist Form included in the Voluntary Cleanup Program.

1. ***The area of impacted soil is approximately 1-acre or less in size.*** The total area of soil with lead concentrations exceeding the 3,800 mg/kg limit is less than 1-acre. As discussed in Section 2.4 of the approved ICAP, the portions of the site that represented a potential threat to soil and/or groundwater were areas previously identified as having total lead concentrations greater than 3,800 mg/kg. Previous statistical analysis, reviewed and approved by MDEQ, demonstrated that the areas where total lead concentrations exceeded 3,800 mg/kg were also likely to exceed the 5.0 mg/L Toxicity Characteristic Leachate Procedure (TCLP) limit that characterizes a material as a hazardous material/waste. As of this date, the areas of the site that exceeded the 3,800 mg/kg limit for total lead have been excavated. The sum of the acreage of each of the four identified areas impacted by lead totaled 0.9-acres. Since this material has now been removed and is in the process of being treated and disposed, these areas no longer pose a threat to the environmental receptors.

2. ***There is no current (or potential) release (via runoff or groundwater discharge) of Contaminants of Concern (COC's) from the Area of Interest (AOI) to a surface water body.*** Long-term groundwater monitoring has clearly established that previously identified groundwater impacts remain confined to the Gulfport Fertilizer site's AOI. The data from the long-term groundwater monitoring has been submitted, reviewed and approved by MDEQ. Additionally, conclusions about the conditions of the groundwater contamination based on the data has been presented to and agreed to by MDEQ. The data demonstrates that groundwater impacts are mostly confined to the original 33-acre portion of the Gulfport Fertilizer property and are not significantly migrating. Accordingly, these data confirm that COC's detected in the groundwater are not being released to surface water receptors or to adjacent property.

   Previous site investigations, especially those conducted in 2001 through 2003, identified impacts to the surface soils on and around the perimeter of the original 33-acre site. Additional site investigations conducted between 2003 and 2005 verified that these impacts have been delineated to the greater site AOI, but are still completely contained within the Gulfport Fertilizer property. The surficial soils exceeding lead and arsenic regulatory limits established for this site are mostly located in or adjacent to wetlands areas of the site where there is little to no relief, thus mitigating or drastically minimizing the ability of surface water to transport contaminated soil particles from this area. In essence, this area acts as a large filter/sponge for limiting any potential contamination from entering any other surface water receptor. This conclusion is verified by sediment sampling performed on June 6, 2002. Stream sediment samples were collected from four locations along a stream located adjacent to the west property line of the original 33-acre Gulfport Fertilizer Site. All soil samples were <u>below</u> arsenic and lead limits established for this site. This information was presented in the *Supplemental Site Characterization Report* submitted to MDEQ on November 8, 2002, which was reviewed and approved by MDEQ. Since the stream from which the sediment samples were collected is immediately adjacent to the most contaminated portion of the site, this shows that sediment is not being significantly transported by the surface water on the site.

   Finally, contemplated as part of the Final Corrective Action Plan, much of the original 33-acre site will be paved and capped. In order to appropriately manage surface water run-off from this area, the Final Corrective Action Plan will also include appropriately designed surface water run-off drainage control features, as well as a plan for the periodic assessment of surface water quality to ensure that no COC's are being discharged from the site. Local regulations will require that detention pond(s) be constructed on-site to control runoff from the site. State regulations will require that the site operator obtain both a Storm Water Discharge Permit and Water Quality Certification before any soil disturbance or construction can begin on the site. Implementing the measures required by these permits and approvals along with storm

water control and monitoring procedures presented in the Final Corrective Action Plan will further insure proper management of surface waters on the site.

3. ***Recreational species, commercial species, threatened or endangered species, and/or their habitats are not currently being exposed or expected to be exposed, to COC's present at or migrating from the AOI.*** Attachment #2 is a letter from the Mississippi Department of Wildlife, Fisheries and Parks (DWF) in response to CAC's June 5, 2008 information request regarding threatened and endangered (T&E) species within the AOI. According the DWF, if best management practices are implemented, particularly measures to prevent, or at least, minimize negative impacts to water quality, the proposed project will most likely not pose a threat to listed species or their habitats. As previously mentioned, the Final Corrective Action Plan and local and state approvals and permits for this site will include appropriate storm water run-off measures and surface water quality assessment contingencies to ensure that surface water quality leaving this site is not impacted.

4. ***There are no obvious impacts to ecological receptors or their habitats.*** No obvious impacts to ecological receptors currently exist within the AOI of this site.

SITE SUMMARY

Pursuant to Section 5 of the Ecological Checklist, the following historical site summary is being provided to verify that the AOI of this site meets the criteria for no further ecological assessment.

Industrial operations on the former Gulfport Fertilizer property date back to the early 1900's. Available records document that the production of super phosphate fertilizer was conducted by the Gulfport Cotton Oil, Fertilizer & Manufacturing Company at this site from the early 1900's to approximately 1921. Crushed limestone rock was transported to this facility by rail spurs from the Illinois Central main line, and off-loaded at the primary production building located on the west side of the original site. The fertilizer production process included spraying the crushed limestone with sulfuric acid to leach phosphate from the limestone rock, then capturing the leached phosphate for fertilizer production.

Available documentation reports that this property underwent a succession of owners, including Gulfport Fertilizer in 1928. The property changed ownership several additional times until Hancock Bank obtained the original 33-are site in 1976 through foreclosure. Hancock Bank also acquired the adjacent "Harreld Trust" property in 2005 bringing the total area of the property to approximately 145-acres.

Information presented in a Phase I Environmental Site Assessment (ESA) conducted on this property in 2006 document that the tract of land adjacent to the original Gulfport Fertilizer site (Harreld Trust property) was vacant/undeveloped land dating back to 1942. The 1957 aerial

photograph of the site and other information confirm that this property underwent partial clearing, however no discernable land use activities were noted. Residents living in this area since 1956 verified that cattle grazing took place intermittently on the "Harreld Trust" property as long as they could recall. The Phase I ESA report also confirmed that the primary period when buildings were demolished on the Gulfport Fertilizer site appeared to have occurred between 1981 and 1996.

As discussed in numerous site investigation reports for this site, soil, groundwater and surface water investigations have been on-going at this site since the late 1990's. Each of these site investigation reports provides information that, when added together, provides a comprehensive understanding of the overall extent of soil and groundwater impacts at this site. In lieu of an exhaustive re-submittal of all this information, CAC will refer the reviewers of this document to those reports for specific information as it pertains to soil and groundwater impacts, delineation of impacts, and corrective actions conducted thus far. The information contained in these reports clearly shows that the soil and groundwater impacts on the subject property have been delineated. An Interim Corrective Action Plan has been prepared, submitted, reviewed, approved and implemented and a Final Corrective Action Plan will be submitted for approval and implementation that will not only provide for the long-term protection of the environment (i.e. groundwater, wetlands habitat, human health, etc.), but will also provide a mechanism to return this property to use as an economically viable piece of commercial/industrial real estate with long-term benefits to the City of Gulfport, MS. Accordingly, based on this information and data collected during the extensive site characterization, CAC concludes that additional ecological risk assessments are not warranted for this property.

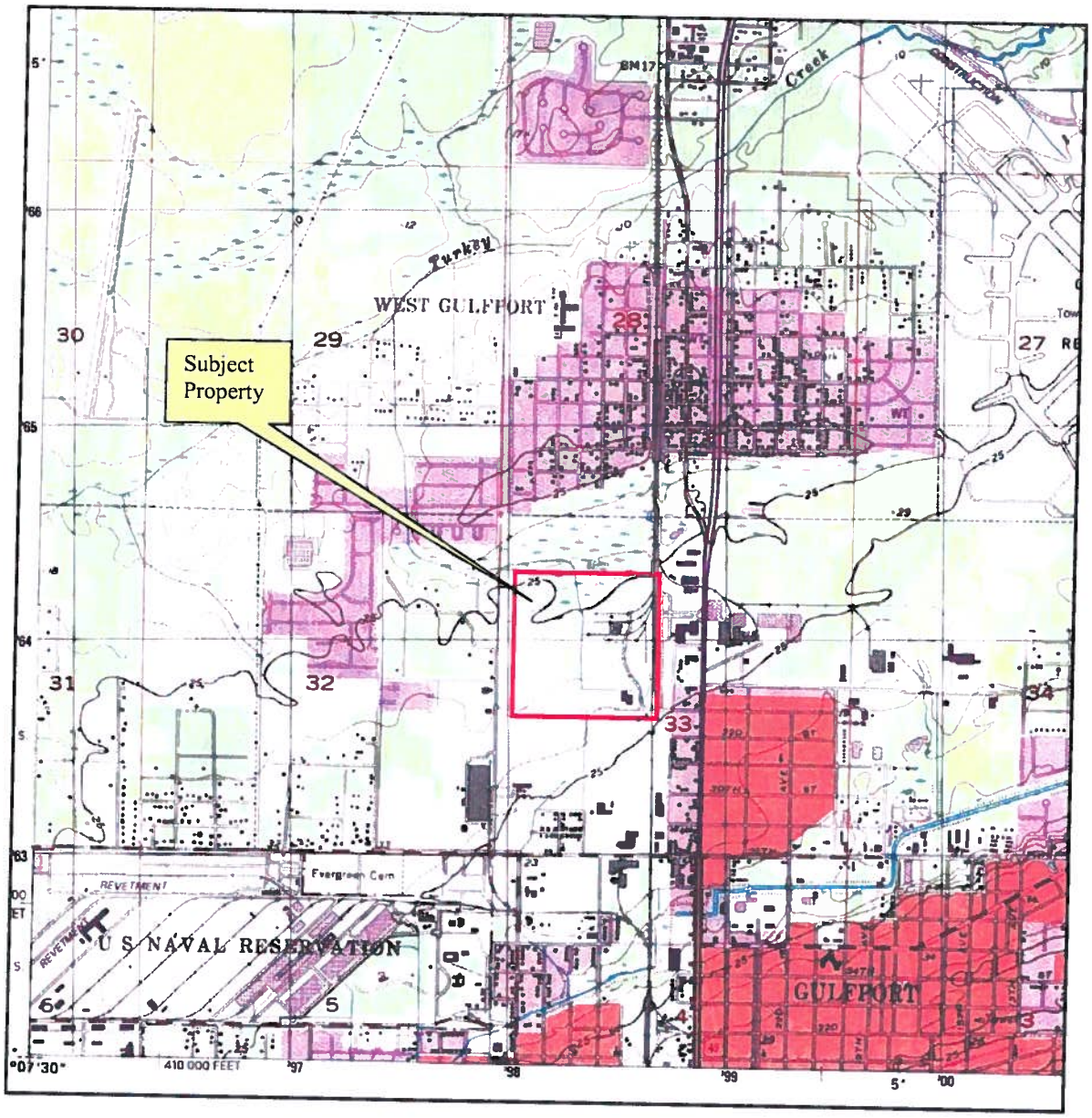
If you or anyone else involved in this project has any questions regarding any information provided in this submittal, please contact us with any questions.

Very truly yours,
Covington & Associates Corporation

John F. Szabo, P.E.
Managing Principal

ENCLOSURES

cc: Mr. Delma Powell, Hancock Bank



Former Gulfport Fertilizer Site
Gulfport, Mississippi

Attachment #1

Ecological Checklist

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
BROWNFIELD VOLUNTARY CLEANUP PROGRAM
ECOLOGICAL CHECKLIST

Section I- Facility Information

1. Name of Facility: Former Gulfport Fertilizer Site
2. Location of Facility: 33rd St. & 34th Avenue, Gulfport, MS
   County: Harrison County
3. Mailing Address:
4. Type of Facility: Former Super Prosphate Fertilizer production facility
5. Describe land use at and in the vicinity of the release site Residential to North and West; Commercial/Industrial to East & South
6. Attach a USGS topographic map of the facility and aerial and other photographs of the release site and surrounding areas.

Section 2-Surrounding Land Use Information

1. Describe land use adjacent to the facility. Primarily Commercial/light industrial. Some residential to North & NW
2. Provide the following information regarding the nearest water body:
   Name of surface water body: Turkey Creek
   Type of surface water body (pond, lake, river etc: Perennial Stream
3. Do any potentially sensitive environmental areas exist adjacent to or in proximity to the site, e.g., Federal and State parks, National and State Monuments, wetlands, etc.
   yes - Jurisdictional Wetlands on the site.

Section 3 - Release Information

1. Nature of release. Historical process operations (Fertilizer Production)
2. Location of the release (within the facility) Original 33 acre Site
3. Location of the release with respect to the facility property boundaries: Central to Northern portion of original 33-acre site
4. Chemicals of Concern (COC) known or suspected to have been released: Arsenic & lead
5. Indicate which media are known or suspected to be impacted and if sampling data are available:

Soil 0-6 feet bgs	(yes)	no
groundwater	(yes)	no
surface water/sediment	(yes)	no

6. Has migration occurred outside the facility property boundaries? yes (no)
   If yes, describe the designated use of the land impacted:

Section 4 - Criteria for Further Assessment

If the Area of Impact (AOI) meets all of the criteria presented below, then typically no further ecological evaluation shall be required. If the AOI does not meet all of the criteria, then a screening level ecological risk shall be conducted. The Submitter should make the initial decision regarding whether or not a screening level ecological risk assessment is warranted based on compliance of the AOI with criteria listed below. After review of the ecological checklist and other available site information, the Mississippi Department of Environmental Quality will make a final determination on the need for a screening level ecological risk assessment. If site conditions at the AOI change such that one or more of the criteria are not met, then a screening level ecological risk assessment shall be conducted.

The criteria for exclusion from further ecological assessment include: (Please See letter)

The area of impacted soil is approximately 1 acre or less in size;

There is no current (or potential) release (via runoff or groundwater discharge) of COCs from the AOI to a surface water body;

Recreational species, commercial species, threatened or endangered species, and/or their habitats are not currently being exposed, or expected to be exposed, to COCs present at or migrating from the AOI; and

There are no obvious impacts to ecological receptors or their habitats.

Section 5 - Site Summary

The ecological checklist submittal shall include a site summary which presents sufficient information to verify that the AOI meets or does not meet the criteria for further assessment.

Section 6 - Submitter Information

Date: June 2008

Name of person submitting this check list: John F. Szabo

Affiliation: Covington & Associates

Signature

Additional Preparers: Jack Jackson

Attachment #2

Mississippi Department of Wildlife, Fisheries and Parks Letter June 11, 2008

MISSISSIPPI
DEPARTMENT OF WILDLIFE, FISHERIES, AND PARKS

Sam Polles, **Ph.D.**
Executive Director

June 11, 2008

Lars Larson
Covington and Associates Corp.
1636 Popps Ferry Road
Suite M-5
Biloxi, MS 39532

Re: Protected Species Data Request
Biloxi, Hancok County, Mississippi **R# 6679**

To Lars Larson:

In response to your request for information dated June 5, 2008, we have searched our database for occurrences of state or federally listed species and species of special concern that occur within 2 miles of the site of the proposed project. Please find our concerns and recommendations below.

Portions of this project site are underlain by hydric soils and may be designated wetlands. If this project is approved, we ask that serious consideration be given to the cumulative impacts of wetland disturbance and elimination.

We recommend that best management practices are implemented and monitored for compliance, specifically measures that will prevent ANY suspended silt and contaminants from leaving the site in stormwater run-off as this may negatively affect water quality and habitat conditions within nearby streams and waterbodies.

Based on information provided, we conclude that if best management practices are implemented, particularly measures to prevent, or at least, minimize negative impacts to water quality, the proposed project likely poses no threat to listed species or their habitats.

Please feel free to contact us if we can provide any additional information, resources, or assistance that will help minimize negative impacts to the species and/or ecological communities identified in this review. We are happy to work with you to ensure that our state's precious natural heritage is conserved and preserved for future Mississippians.

Sincerely,

Andy Sanderson

Andy Sanderson, Research Biologist
Mississippi Natural Heritage Program
(601) 354-6367, ext. 117

The Mississippi Natural Heritage Program (MNHP) has compiled a database that is the most complete source of information about Mississippi's rare, threatened, and endangered plants, animals, and ecological communities. The quantity and quality of data collected by MNHP are dependent on the research and observations of many individuals and organizations. In many cases, this information is not the result of comprehensive or site-specific field surveys; most natural areas in Mississippi have not been thoroughly surveyed and new occurrences of plant and animal species are often discovered. Heritage reports summarize the existing information known to the MNHP at the time of the request and cannot always be considered a definitive statement on the presence, absence or condition of biological elements on a particular site.

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

MEMORANDUM

TO: Gulfport Fertilizer Site File
Gulfport, MS

FROM: Tony Russell 7/16/08

DATE: July 17, 2008

SUBJECT: Site Inspection Conducted July 16, 2008

I conducted a site visit at the Gulfport Fertilizer site on July 16 to observe the mixing of amendments to soil. Several of the stock piles of soil failed TCLP. The amendments would bind the lead in the soil making it non-hazardous by characteristics. Roll-off boxes (container) were staged over plastic and bermed to contain spillage. The soil was moved from the piles to the container with a front-end loader. The amendment was measured into a small Bobcat loader then dumped into the container where it was mixed with a track-hoe. After being thoroughly mixed, the soil was loaded into the front-end loader bucket and then moved to the temporary storage area. Once the entire pile was treated, a composite sample would be collected to verify that the soil was rendered non-hazardous.

They anticipated being able to treat a stock pile of soil a day. Each stock pile is approximately 100 yards of soil.

Photos were taken during this site visit and are attached.

Gulfport Fertilizer
Gulfport, Ms.
7-16-08

Berm around stock piles

Stock pile of hazardous material ~~being~~ to be treated

Stock piles labeled with red numbers - hazardous waste

Background - Stock piles of soil to be treated

Foreground - amendment material / to dust soil

Area to stock pile treated soil

Gulfport Fertilizer
Gulfport, Ms.
7-16-08

Amendment material - used to treat soil - 3% by volume

treatment Area

Treatment Area - Bermed & Lined

Measuring treatment material into Bobcat bucket

Bobcat - transferring treatment material to treatment containers

Deeon Area

Gulfport Fertilizer
Gulfport, MS
7-16-08

Mixing 10 yds soil with amendment material

Mixing

Mixing

Finished mixing – moving to loader for transfer to storage area

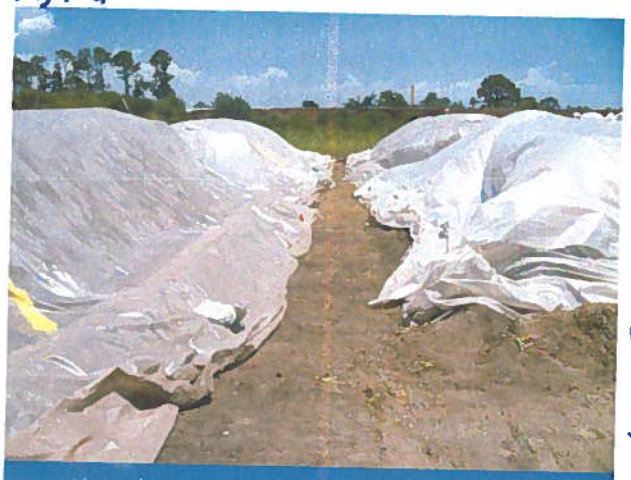
Storage Area

Gulfport Fertilizer 7-24-08 Gulfport, Ms

Treated Soil →

Staging Area for treated soil →

Treating Soil in container →



← Treated Soil

Loading treated soil for transfer to staging area

Treatment Container ←

Gulfport Fertilizer Site
7-24-08
Gulfport MS

duplicate photos

transfer trucks soil staging Area

worker wetting soil

photo of treatment Area

Areas backfilled with clean soil

backfilled Area

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

April 3, 2008

FILE COPY

Mr. Delma Powell
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

Re: Former Gulfport Fertilizer Site
Comprehensive Groundwater Monitoring Report dated January 31, 2008
Gulfport, Mississippi

Dear Mr. Powell:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document, prepared by Covington & Associates and submitted on your behalf. Our review generated no comments.

Groundwater monitoring at this site should continue to be conducted on a quarterly basis. MDEQ requests that a minimum of two weeks notice be provided prior to conducting the referenced sampling event, by either email or a phone call.

Should you have any questions, please contact Kayra Johnson at 601.961.5106.

Sincerely,

Kayra N. Johnson, P.E.
Project Manager

Tony Russell, Chief
Assessment and Remediation Branch

cc: John Szabo, Covington & Associates

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

March 19, 2008

Mr. Delma Powell
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

Re: Former Gulfport Fertilizer Site
Revised Interim Corrective Action Plan, dated February 18, 2008
Gulfport, Mississippi

Dear Mr. Powell:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document, prepared by Covington & Associates and submitted on your behalf, in response to MDEQ's January 18, 2008 comments to the previously submitted interim Corrective Action Plan. The revised interim CAP dated February 18, 2008 is approved.

The proposed schedule for implementing the interim CAP was based on the date of MDEQ's approval of the CAP. The official approval date for this interim plan is March 19, 2008. Therefore, please be advised that the schedule in the interim CAP is now in effect.

Should you have any questions, please contact Kayra Johnson at 601.961.5106.

Sincerely,

Kayra N. Johnson, P.E.
Project Manager

Tony Russell, Chief
Assessment and Remediation Branch

cc: John Szabo, Covington & Associates

COVINGTON AND ASSOCIATES
1636 Popps Ferry Road, Suite M-5
Biloxi, MS 39532

PHONE: 228-396-0486
FAX: 228-396-0487
E-MAIL: tony@covingtonassociates.net

February 18, 2008

Tony Russell and Kayra N. Johnson, P.E.
Mississippi Department of Environmental Quality
Office of Pollution Control
Post Office Box 10385
Jackson, Mississippi 39289-0385

Re: Submittal of Revised Interim Corrective Action Plan, dated September 28, 2007
Gulfport Fertilizer Site, Gulfport, Mississippi

Dear Mr. Russell and Ms. Johnson:

Covington & Associates Corporation has reviewed and addressed the comments contained in Mississippi Department of Environmental Quality's (MDEQ's) letter of January 18, 2008 concerning MDEQ's review of the Interim Corrective Action Plan dated September 28, 2007 for the subject site. The attached Interim Corrective Action Plan has been revised to address those comments. Below is a summary of our response to the MDEQ's comments.

Section 2.6 Capping of Arsenic/Lead Contaminated Soil. For the final cap to be acceptable, it must be 6 inches of asphalt or concrete or a minimum of 10 inches of clean compacted soil. *The comment has been discussed with a representative of the future purchaser of the property. Hancock Bank (present owner of the property) and the future purchaser are in discussions to finalize the purchase contract. Part of the future purchaser's responsibilities will be to prepare and submit a Final Corrective Action Plan to MDEQ for approval. Upon receipt of approval, the future purchaser will implement the approved Final Corrective Action Plan. The Final Corrective Action Plan submitted by the future purchaser will reflect minimum capping requirements listed in MDEQ's January 18, 2008 letter.*

Section 7.0 Performance Monitoring Plan. MDEQ agrees with the collection of composite samples for TCLP analysis for lead on each of the 100 cubic yard stockpiles. *Agreed- No response necessary.*

Section 7.0 Performance Monitoring Plan. If the TCLP analysis of each stockpile samples determines the soil is hazardous, soil must either be disposed at a hazardous waste landfill or treated prior to its disposal. The soil can be treated in situ or in a tank in accordance with RCRA regulations. *Agreed-The appropriate text has been incorporated into the Interim Corrective Action Plan.*

Section 7.0 Performance Monitoring Plan. Confirmatory samples collected from the bottom and sidewalls of the excavation must be analyzed using the TCLP method. Each sample must be collected within 2 inches of the unexcavated soil surface, rather than 0-6 inches as proposed. *Agreed- The appropriate text has been incorporated into the Interim Corrective Action Plan.*

Figures 1, 3 and 7 show a lead limit for soil contamination of 800 mg/kg. The TRG for lead in soil is 400 mg/kg (unrestricted) and 1,700 mg/kg (restricted). These figures must be revised to reflect the correct limit. All soils with concentrations greater than 400 mg/kg will be restricted, and those areas with concentrations greater than 1,700 mg/kg will also require engineering controls. *Agreed – Figures 1, 3 and 7 have been revised as reflected in the Interim Corrective Action Plan.*

Figures 2, 3 and 5 show the plume boundary for the groundwater contamination. However, the isopleths are not labeled with the corresponding concentrations. The plume boundary for Arsenic and Lead should be 10 µg/L and 15 µg/L, respectively. *Agreed – Figures 2, 3 and 5 have been revised as reflected in the Interim Corrective Action Plan.*

Site Health and Safety Plan. Emergency Contact numbers- Please revise this list to include the actual phone numbers for the Fire and Police, and Sheriff departments. Also, a map showing directions to the nearest hospital or emergency treatment facility should be included in the plan. *Agreed- The requested phone numbers and a map with directions have been incorporated into the Site Health and Safety Plan.*

A final report documenting the activities conducted under the interim CAP must be submitted to MDEQ within 90 days of the completion of the field work outlined in the interim CAP. *Agreed- A final report documenting activities conducted under the interim Corrective Action Plan will be submitted to MDEQ within 90 days of the completion of field work outlined in the Interim Corrective Action Plan.*

Covington & Associates Corporation

Anthony P. Damiano, Jr.
Senior Consultant

John F. Szabo, P.E.
Managing Principal

ENCLOSURES

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR
January 18, 2008

FILE COPY

Mr. Delma Powell
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

Re: Former Gulfport Fertilizer Site
Revised Interim Corrective Action Plan, dated September 28, 2007
Gulfport, Mississippi

Dear Mr. Powell:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document, prepared by Covington & Associates and submitted on your behalf, in response to MDEQ's June 27, 2005 comments to the Interim Corrective Action Plan. Our review generated the following comments:

1. Section 2.6 Capping of Arsenic/Lead Contaminated Soil. For the final cap to be acceptable, it must be 6 inches of asphalt or concrete or a minimum of 10 inches of clean compacted soil.

2. Section 7.0- Performance Monitoring Plan- MDEQ agrees with the collection of composite samples for TCLP analysis for lead on each of the 100 cubic yard stockpiles .

3. Section 7.0- Performance Monitoring Plan- If the TCLP analysis of each stockpile samples determines the soil is hazardous, soil must either be disposed at a hazardous waste landfill or treated prior to its disposal. The soil can be treated in situ or in a tank in accordance with RCRA regulations.

4. Section 7.0- Performance Monitoring Plan- Confirmatory samples collected from the bottom and sidewalls of the excavation must be analyzed using the TCLP method. Each sample must be collected within 2 inches of the unexcavated soil surface, rather than 0-6 inches as proposed.

5. Figures 1, 3, and 7 show a lead limit for soil contamination of 800 mg/kg. The TRG for lead in soil is 400 mg/kg (unrestricted) and 1,700 mg/kg (restricted). These figures must be revised to reflect the correct limit. All soils with concentrations greater than 400 mg/kg will be restricted, and those areas with concentrations greater than 1,700 mg/kg will also require engineering controls.

6. Figures 2, 3, and 5 show the plume boundary for the groundwater contamination. However, the isopleths are not labeled with the corresponding concentrations. The plume boundary for Arsenic and Lead should be 10 µg/L and 15 µg/L, respectively.

7. Site Health and Safety Plan- Emergency Contact numbers- Please revise this list to include the actual phone numbers for the Fire and Police, and Sheriff departments. Also, a map showing directions to the nearest hospital or emergency treatment facility should be included in the plan.

8. A final report documenting the activities conducted under the interim CAP must be submitted to MDEQ within 90 days of the completion of the field work outlined in the interim CAP.

Please submit a revised interim CAP that addresses these comments, by no later than February 8, 2008. If you have any questions or comments, feel free to contact Kayra Johnson at 601.961.5106.

Sincerely,

Kayra N. Johnson, P.E.
Project Manager

Tony Russell, Chief
Assessment and Remediation Branch

cc: John Szabo, Covington & Associates

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

MEMORANDUM

TO: Gulfport Fertilizer-File
Gulfport, Mississippi

FROM: Kayra N. Johnson, P.E. KJ

DATE: December 18, 2007

SUBJECT: Groundwater sampling event- November 2, 2007

I met with Lars Larson (Covington and Associates) on November 2, 2007 to collect groundwater samples. I arrived onsite at 10:50 and contacted Mr. Larson. Because of rain during the previous week, accessibility to new wells installed on October 15, 2007 was limited to all-terrain vehicles.

After discussing the accessibility issue with Mr. Larson and with Tony Russell (MDEQ), it was agreed Mr. Larson would collect the samples from MW-9 and MW-11, while I waited nearby. Both samples were taken to the OPC lab for analysis for lead and arsenic.

I left the site at 14:10 in route to the OPC lab

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FILE COPY

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

November 1, 2007

Mr. Delma Powell
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

Re: Notification of Increase in Hourly Rate
Gulfport Fertilizer Site, Application No.40470064
Voluntary Evaluation Program (VEP) Agreed Order No. 3746-98
Gulfport, Mississippi

Dear Mr. Powell:

The above referenced Agreed Order between you and the Mississippi Department of Environmental Quality (MDEQ) was reached to address requirements for the subject site to participate in MDEQ's Voluntary Evaluation Program (VEP). The hourly rate for MDEQ oversight costs was set in the Order at $75/hour, which has not been increased since the inception of the program in 1996.

After careful consideration and pursuant to Section 3(a) of the Agreed Order, MDEQ has elected to exercise its right to increase the per hour rate from $75 to $100, effective January 1, 2008. Without the increase, the program has been projected to be in the red by the end of this State fiscal year, which is June 2008. Should you have any questions or comments concerning the rate increase, please contact me at 601-961-5318.

Sincerely,

Tony Russell, Chief
Assessment Remediation Branch

cc: Mona Varner MDEQ [VIA EMAIL]

Covington & Associates Corporation
Environmental Engineers and Consultants

September 28, 2007

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

Re: Revised Interim Corrective Action Plan (CAP)
Former Gulfport Fertilizer Plant Site
33rd Street, Gulfport, Mississippi
CAC Project No. 9397

Dear Tony:

Covington and Associates Corporation (CAC) is pleased, on behalf of its client – Hancock Bank, to submit two (2) copies of the enclosed Revised Interim Corrective Action Plan. This Interim Corrective Action Plan has been revised to address issues presented in MDEQ's letter dated June 27, 2005 to Mr. John M. Hairston (see attached).

Additionally, the Interim Corrective Action Plan has been revised to reflect those on-site activities Hancock Bank will perform and those activities that will be addressed by some future purchaser of the property. At this time, Hancock Bank does not know who the potential purchaser of the property is, but wanted to clearly establish who would be responsible for addressing some of the issues presented in the June 27th letter with MDEQ, i.e., the potential purchaser. The potential purchaser will, however, develop the site for an industrial use or uses.

As presented in the attached Interim Corrective Action Plan, we are scheduled to install the seven (7) additional monitoring wells on the site beginning October 15, 2007. We hope that you concur with this and allow these monitoring wells to be installed, since re-scheduling a drilling contractor to install these wells would be difficult.

Please contact me with any questions or issues you feel need to be addressed in the attached Interim Corrective Action Plan. We greatly appreciate your assistance on

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www.covingtonassociates.net

moving this project forward.

Very truly yours,
COVINGTON AND ASSOCIATES CORPORATION

John F. Szabo, P.E.
Principal

cc: Mr. Delma Powell, Hancock Bank
Ms. Joy Lambert Phillips, Hancock Bank

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

June 27, 2005

Mr. John M. Hairston, Chief Operations Officer
Hancock Bank, Inc.
P.O. Box 4019
Gulfport, Mississippi 39502

Re: Former Gulfport Fertilizer Site
Interim Corrective Action Plan, dated May 30, 2005
Gulfport, Mississippi

Dear Mr. Hairston:

The Mississippi Department of Environmental Quality (MDEQ) has completed a review of the above referenced document submitted by Covington and Associates on behalf of Hancock Bank. The *Interim Corrective Action Plan* cannot be approved for the following reasons:

1. Section 2.9 Health and Safety Plan: A Health and Safety Plan meeting the minimum requirements of 29 CFR 1910.120 shall be forwarded to the MDEQ for review.

2. Section 5.0 Remedial Goals: The current Tier I TRG (restricted) for lead is 1,700 mg/Kg and *not* 800 mg/Kg.

3. Section 7.0 Performance Monitoring Plan: A more detailed excavation plan should be prepared and submitted to MDEQ. At a minimum, the plan should detail the following:

    a. Any necessary site preparation activities (clearing & grubbing).
    b. Utility location and identification.
    c. Establishment of a secure work area.
    d. Establishment of a decontamination area and decontamination procedures.
    e. Storm water run-on/run-off control.
    f. Air monitoring and dust control measures.
    g. Removal, segregation, and stockpiling of contaminated soils.
    h. Profile sampling of soils for characteristic wastes.
    i. Handling of hazardous vs. non-hazardous soils.

j. Confirmation sampling procedures.
k. Surveying of excavated/remediated areas and confirmation sampling points.
l. Backfilling to final grade procedures.
m. Final surface preparation.

In addition, the MDEQ has the following general comments about the *Interim Corrective Action Plan*:

1. Section 1.0 Introduction: Once a final disposition of the property has occurred, Hancock Bank and/or the new property owner shall have sixty (60) days to submit a Final Corrective Action Plan to MDEQ for review/approval.

2. Section 1.1 Objectives and Rationale: Any Final Corrective Action Plan submitted to the MDEQ should include the following objectives:

    a. Reduction of the long-term mobility, toxicity and volume of the contaminants (lead and arsenic) that are to remain in-place. This objective can be accomplished thru a variety of methods including (but not limited to):
        i. Removal
        ii. Monitored natural attenuation in conjunction with a final cap that meets a minimum performance standard to be determined by the final property owner and the MDEQ.
        iii. In-Situ treatment/stabilization with binding agents (e.g. cement, lime, kiln dust, fly ash, silicates, clay, zeolites, etc.).
        iv. A combination of one or more methods.
    b. A restricted use Agreed Order with a property deed restriction will have to be executed between the final property owner and the MDEQ. This is necessary whenever contamination above the MDEQ Tier I TRG's (unrestricted) remains on the property. The Agreed Order will define the conditions under which the MDEQ will allow contaminated soils and/or groundwater to remain in place.
    c. A long-term groundwater monitoring plan will have to be submitted for review/approval by MDEQ. The plan should include the sampling frequency and analysis to be conducted. In addition, the plan should include contingencies to address contaminated groundwater that migrates beyond the proposed groundwater monitoring network and/or off-site.
    d. An Ecological Risk Assessment will have to be conducted. The purpose of the Ecological Risk Assessment is to determine if there are ecological receptors that could be adversely affected by allowing contamination to remain in place. This Risk Assessment

should be limited in scope and focused primarily on the wetland areas of the site.

3. Section 2.5 On-Site NORM Contamination: Radioactive NORM waste is regulated by the Mississippi State Department of Health (MSDH). The contact person is Mr. Robert Goff at 601-987-6893. Hancock Bank is encouraged to consult with the MSDH to determine if the site is subject to the MSDH regulations and if any remediation is necessary.

4. Section 2.6 Capping of Arsenic/Lead Contaminated Soil: The long-term reduction in mobility, toxicity and volume of the contaminants (lead and arsenic) may not be adequately accomplished with the application of asphalt pavement as a simple asphalt cap may be too permeable and not resistant to damage/degradation.

The MDEQ requests a written response to these comments by July 29, 2005. If you should have any questions or comments you may contact Brian Young at 601.961.5088.

Sincerely,

Brian Young
Project Manager

Tony Russell, Chief
Assessment & Remediation Branch

cc: Mr. John Szabo, Covington & Associates

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

MEMORANDUM

TO: Gulfport Fertilizer Site File

FROM: Tony Russell TR 10/16/07

DATE: October 16, 2007

SUBJECT: Installation of Permanent MWs

I met with Lars Larson (Covington & Associates) on October 15, 2007 to observe the installation of permanent monitoring wells at the Gulfport Fertilizer site located on 33rd Street in Gulfport, MS. I arrived on site at 10:30 am. They had not begun drilling the wells upon arrival. At approximately 11:00 they started mobbing into the wetland area and got stuck immediately. The dozer they were using to make the roads was used to drag the geoprobe rig and equipment trailer/four wheeler around. The drilling company was not prepared for the site conditions.

They had problems with flowing sands on the first well so had to drill out the hole again to get to the desired depth of 15 feet. Upon reaching total depth, they set the well screen to 15 feet and poured the sand pack around the well screen. They added bentonite pellets for the seal above the sand pack. The well would be completed by adding grout from the bentonite seal to the surface when they finished the other wells which would be on Wednesday. The dozer hauled the augers out to the decontamination pad.

I departed the site at 4:00 pm upon learning that they did not plan on drilling another well that afternoon.

No photos were taken during this field event.

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

MEMO TO FILE

Gulfport Fertilizer
Gulfport, MS
July 31, 2007

Today I talked with Joy Phillips, Hancock Bank attorney, and Teri Wiley, Port Commission attorney, about the status of the Gulfport Fertilizer site. According to Ms. Phillips there is a court hearing on Wednesday morning with a former prospective purchaser of the Gulfport Fertilizer site. It is possible that the hearing may result in the Hancock Bank having the authority to proceed with the sale of the property to the Port Commission but that may not happen and further negotiations may have to take place with the former prospective purchaser.

I told both Ms. Phillips and Ms. Wiley that MDEQ was in a holding pattern regarding the site and our previous request for a final CAP (Corrective Action Plan). We will not do anything with regard to the site until such time as we hear from one of them that they need our assistance or cooperation in proceeding with the final closure of the site.

Jerry B. Barbe

Gulfport Fertilizer
Teri Wylie
228-214-0413

Hancock Bank Joy Phillips
228-[redacted]-563-6508

Established 1908

RUSHING & GUICE, P.L.L.C.

ATTORNEYS AT LAW

WILLIAM L. GUICE III
ATTORNEY
Licensed In: Mississippi, Texas, District of Columbia

R. SCOTT WELLS
ATTORNEY
Licensed In: Mississippi, Louisiana

604 POTTER AVE.
OCEAN SPRINGS, MS 39564

P.O. BOX 1925
BILOXI, MS 39533-1925

PHONE 228-374-2313
FAX 228-875-5987
www.rushing-guice.com
atty@rushing-guice.com

MARIA M. COBB
ATTORNEY
Licensed In: Mississippi, Louisiana

LAUREN S. DUVERNAY
ATTORNEY
Licensed In: Mississippi, Alabama

June 11, 2007

Our File No. 6821

VIA FACSIMILE (601) 961-5300

Ms. Kayra N. Johnson, P.E., Project Manager
Mr. Tony Russell
Chief Assessment & Remediation Branch
MS Department of Environmental Quality
101 W. Capitol Street
Jackson, MS 39201

Re: Gulfport Fertilizer Site
Gulfport, Mississippi

Dear Ms. Johnson and Mr. Russell:

Please be advised that the law firm of Rushing & Guice, PLLC has the pleasure of representing Hancock Bank with respect to the above-referenced matter and it is on their behalf that I am writing you this date. Previous counsel in this matter was Trudy Fisher. Ms. Fisher is now the director of the MDEQ. Therefore, it would be inappropriate for her to continue to represent the bank. I have been handed your correspondence of May 30, 2007, and am responding thereto. Currently, there is pending certain litigation which would affect the closing of the sale referenced in your correspondence and we are awaiting a decision from the court with respect to same.

In your correspondence, you indicated that MDEQ has not received a revised Corrective Action Plan for the site and that MDEQ requested additional information per your letter of October 4, 2004, regarding the Corrective Action Plan. Our client, through its environmental consultant (Covington & Associates) is aware of this, since the Corrective Action Plan is directly tied into the end use of the property. It would be better to wait until the end user (Purchaser) can direct the preparation of the Corrective Action Plan, since it will be the responsibility of the Purchaser to implement the Corrective Action Plan.

I thank you in advance for your attention in this matter. I look forward to hearing from you.

Very truly yours,

RUSHING & GUICE, PLLC

WILLIAM LEE GUICE III

WLGIII/tm
cc: Mr. Delma Powell
Ms. Tracie Ryan
Mr. John F. Szabo, P.E.

Established 1908

RUSHING & GUICE, P.L.L.C.

ATTORNEYS AT LAW

WILLIAM L. GUICE, III
ATTORNEY
LICENSED IN: MISSISSIPPI, TEXAS, DISTRICT OF COLUMBIA

R. SCOTT WELLS
ATTORNEY
LICENSED IN: MISSISSIPPI, LOUISIANA

604 PORTER AVENUE
OCEAN SPRINGS, MS 39564

POST OFFICE BOX 1925
BILOXI, MS 39533-1925

PHONE 228-875-5263
FAX: 228-875-5987

www.rushing-guice.com
attyl@rushingguice.com

MARIA M. CUBB
ATTORNEY
LICENSED IN: MISSISSIPPI, LOUISIANA

LAUREN DUVERNAY
ATTORNEY
LICENSED IN: MISSISSIPPI, ALABAMA

FAX

TO: **Mr. Tony Russell**
Ms. Kayra N. Johnson, P.E.

FAX NO.: (601) 961-5300

DATE: **June 11, 2007**

FROM: **William Lee Guice III**

TOTAL NO. OF PAGES: 3 (including cover sheet)

RE: **Gulfport Fertilizer Site**
Gulfport, MS

MESSAGE:

Please see attached correspondence.

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

May 30, 2007

Mr. Delma Powell
Hancock Bank of Gulfport Mississippi
Post Office Box 4019
Gulfport, Mississippi 39502-4019

FILE COPY

Re: Gulfport Fertilizer Site
Gulfport, Mississippi

Dear Mr. Powell:

On January 9, 2007, the Mississippi Department of Environmental Quality (MDEQ) received a letter outlining the status of the project for the above referenced site. The letter stated the property was under contract and the property was set to close mid-February. Per telephone conversation with John Szabo of Covington and Associates on May 22, 2007, the sale has not been finalized yet.

MDEQ has not received a revised Corrective Action Plan (CAP) for this site. MDEQ requested additional information per MDEQ letter dated October 4, 2004 regarding the CAP. Please be advised that MDEQ has not approved a CAP for this site.

Please continue to keep us informed as to the status of the sale of the property. Should you have any questions, please contact Kayra Johnson at 601.961.5106.

Sincerely,

Kayra N. Johnson, P.E.
Project Manager

Tony Russell, Chief
Assessment & Remediation Branch

cc: John F. Szabo, P.E. Covington and Associates

Covington & Associates Corporation
Environmental Engineers and Consultants

January 9, 2007

Mr. Tony Russell
Uncontrolled Sites Division
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39289-0385

Re: Status of Project
Former Gulfport Fertilizer Site, Gulfport, Mississippi
CAC Project No. 9397

Dear Tony:

It was a pleasure talking with you and Kayra Johnson today about the status of the subject project. This letter will document that conversation. Should there be additional documentation that is not included in this letter or additional information you require, please contact us immediately.

As discussed, the Mississippi State Port Authority, just prior to Hurricane Katrina, decided not to proceed with purchasing the property. Since Hurricane Katrina, nothing has been done on the property to implement the *Interim Corrective Action Plan* submitted to the Mississippi Department of Environmental Quality (MDEQ). Hancock Bank, owner of the property, presently has the property under contract to a potential purchaser. The property is set to close in mid-February.

Covington and Associates Corporation (CAC) has met with the potential purchaser and has reviewed the requirements of the *Interim Corrective Action Plan* and *Final Corrective Action Plan*. We have also provided the potential purchaser with our files for their review.

Additionally, CAC has begun addressing the comments from Mr. Brian Young, MDEQ, concerning the *Interim Corrective Action Plan*. Most of these comments have been addressed in a revised *Interim Corrective Action Plan* or *Final Corrective Action Plan*, but CAC has not submitted these revised plans to MDEQ since the potential purchaser may have some modifications, based on their site development plans.

We will keep you informed of the status of the sale of this property. If you have any questions concerning the information contained in this letter, please contact me. We appreciate MDEQ's

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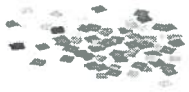
www.covingtonassociates.net

willingness to work with our client (Hancock Bank) in addressing the environmental issues associated with this site. Hancock Bank is committed to seeing that the environmental requirements are implemented and have been very clear in these requirements to any potential purchaser of the property.

Respectfully submitted,
COVINGTON AND ASSOCIATES CORPORATION

John F. Szabo, P.E.
Principal

Cc: Mr. Delma Powell, Hancock Bank



Kayra Johnson/GW/OPC/DEQ
12/27/2006 03:03 PM

To jfszabo@bellsouth.net
cc Tony Russell/HW/OPC/DEQ@DEQ
bcc
Subject Former Gulfport Fertilizer Site
Gulfport, MS

Mr. Szabo:

I have recently become the project manager for the above referenced site. I have reviewed our files and the last correspondance received was the interim corrective action plan dated May 30, 2005 and the subsequent response to our comments on the CAP.

The interim CAP stated the Mississippi Port Authority was interested in purchasing the property, and a final CAP would be submitted once the purchase agreement had been finalized.

Can you give us an update as to the status of this purchase and the submittal of the final corrective action plan? Please let me know if you have any questions.
Thanks

Kayra N. Johnson, P.E.
Assessment and Remediation Branch
GARD
MS Dept. of Environmental Quality
101 W. Capitol Street
Jackson, MS 39201
Phone: (601) 961-5106
Fax: (601) 961-5300

"John Szabo"
<jfszabo@bellsouth.net>

01/05/2007 09:14 AM

To <Kayra_Johnson@deq.state.ms.us>

cc <Tony_Russell@deq.state.ms.us>, "Delma Powell (E-mail)" <delma_powell@hancockbank.com>

bcc

Subject RE: Former Gulfport Fertilizer Site Gulfport, MS

Kayra,

It was good to talk to you this morning to bring you up to date on the status of the Gulfport Fertilizer Site. As stated, the site was not bought by the Mississippi Port Authority. This decision was made a few days before Hurricane Katrina hit. Since then, we (Hancock Bank and Covington and Associates) have been dealing with more immediate issues.

The site is presently under contract, however, with closing scheduled for mid-February. I have reviewed the interim CAP requirements with the potential purchaser as well as the Final CAP requirements that have been discussed with MDEQ. The potential purchaser may want to make some minor modifications that are in keeping with the intent of the Final CAP requirements and, once the site purchase is complete, we would want to sit down with MDEQ to discuss these modifications so that the Final CAP can be submitted.

Please note the contact information below. Our address and phone numbers have changed. We look forward to working with you on this and getting this property back into productive use.

John F. Szabo, P.E.
Managing Principal
Covington and Associates Corporation
1636 Popps Ferry Road, Suite M-5
Biloxi MS 39532
(228) 396-0486
(228) 396-0487 (fax)
(228) 216-1158 (cell)

-----Original Message-----
From: Kayra_Johnson@deq.state.ms.us
[mailto:Kayra_Johnson@deq.state.ms.us]
Sent: Wednesday, December 27, 2006 3:04 PM
To: jfszabo@bellsouth.net
Cc: Tony_Russell@deq.state.ms.us
Subject: Former Gulfport Fertilizer Site Gulfport, MS

Mr. Szabo:

I have recently become the project manager for the above referenced site. I have reviewed our files and the last correspondance received was the interim corrective action plan dated May 30, 2005 and the subsequent response to our comments on the CAP.

The interim CAP stated the Mississippi Port Authority was interested in purchasing the property, and a final CAP would be submitted once the purchase agreement had been finalized.

Can you give us an update as to the status of this purchase and the submittal of the final corrective action plan? Please let me know if you have any questions.
Thanks

Kayra N. Johnson, P.E.
Assessment and Remediation Branch
GARD
MS Dept. of Environmental Quality
101 W. Capitol Street
Jackson, MS 39201
Phone: (601) 961-5106
Fax: (601) 961-5300

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

July 11, 2005

Mr. John M. Hairston, Chief Operations Officer
Hancock Bank, Inc.
P.O. Box 4019
Gulfport, Mississippi 39502

Re: Former Gulfport Fertilizer Site
Interim Corrective Action Plan, dated May 30, 2005
Gulfport, Mississippi

Dear Mr. Hairston:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the letter dated July 9, 2005, prepared by Covington and Associates in response to MDEQ's June 27, 2005 comments to the Interim Corrective Action Plan. MDEQ approves the Interim Corrective Action Plan as modified by this response submitted on behalf of Hancock Bank.

If you have any questions or comments, feel free to contact me at (601) 961-5221.

Sincerely,

Jerry B. Banks, P.E., DEE
Chief, Groundwater Assessment & Remediation Division

OFFICE OF POLLUTION CONTROL
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Covington & Associates Corporation

July 11, 2005

Mr. Jerry Banks
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39289-0385

Re: Response to MDEQ Letter dated June 27, 2005
Interim Corrective Action Plan
Former Gulfport Fertilizer Site, Gulfport, Mississippi
CAC Project No. 9397

Dear Mr. Banks:

Our client, Hancock Bank, is in receipt of the June 27th letter from Mr. Brian Young and Mr. Tony Russell of the Mississippi Department of Environmental Quality (MDEQ) concerning the *Interim Corrective Action Plan* submitted by Covington and Associates Corporation (CAC) on May 30, 2005. Given that our client and the potential purchaser of our client's property are in final negotiations for the purchase of the property, the approval of the *Interim Corrective Action Plan* and the "general" acceptance of the Conceptual Design presented in Section 2.0 of the *Interim Corrective Action Plan* is a vital part of that final negotiation. Therefore, we are submitting this response to MDEQ's June 27th letter in hopes that MDEQ will grant approval of the previously submitted *Interim Corrective Action Plan*. Our response comments are as follows:

1. Section 2.9 Health and Safety Plan: We concur that a Health and Safety Plan is required before the *Interim Corrective Action Plan* is implemented on the site. Hancock Bank has not engaged a contractor for implementing the tasks of the *Interim Corrective Action Plan* - excavation, monitoring well installation and security fencing installation. Prior to any of the tasks being implemented, a Health and Safety Plan will be prepared and signed by the contractor(s) working on the site. A copy of this Health and Safety Plan will be provided to MDEQ.

2. Section 5.0 Remedial Goals: The remedial goal for lead in soil on an industrial site should be 1,700 mg/kg instead of the 800 mg/kg shown in the *Interim Corrective Action Plan*. Section 5.0 of the *Interim Corrective Action Plan* will be revised to reflect the remedial goal for lead in soil for restricted sites.

3. Section 7.0 Performance Monitoring Plan: The MDEQ is requesting additional detail concerning the Performance Monitoring Plan for the excavation of lead soil over 3,800 mg/kg. The *Interim Corrective Action Plan* will be revised to provide the following additional detail:

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www.covingtonassociates.net

a. Site Preparation: The area of soil with a lead concentration greater than 3,800 mg/kg is located in an area of the site where there is mostly vegetation, not trees. There will be little site preparation required, except locating the area of contamination. Any removed vegetation will be placed in the containment area where excavated soils will be stored.
b. Utility Location and Identification: The area to be excavated is in an area of the site where no utilities are located. Previous soil borings advanced in the area have confirmed that no utilities are located in this area. As a precaution, Mississippi One Call will be contacted prior to implementing this task of the *Interim Corrective Action Plan.*
c. Secure Work Area: It is in Hancock Bank's interest that the work area is secure. The work area will be marked to notify unauthorized personnel not to enter the area. If these measures are not sufficient, additional measures, such as employing a security guard during non-working hours, may be undertaken.
d. Decontamination Area and Procedures: As with all environmental projects, decontamination procedures and area is required. These have been discussed with the contractors who may be working on the site. These procedures will be documented in the *Final Corrective Action Plan.*
e. Storm water Run-on/Run-off Control: Storm water control measures will be implemented to prevent storm water from entering the excavation. These measures will include berming and diversion ditches. Any storm water collecting in the excavation will be pumped out by a vacuum truck and properly disposed.
f. Air Monitoring and Dust Control: Area air monitoring – background (upwind) and downwind) - will be performed during excavation activities. Construction workers most exposed to the soil during excavation will wear personnel monitoring pumps. Dust control measures during excavation will be implemented to keep the soil damp to prevent dust.
g. Removal, Segregation and Stockpiling of Contaminated Soil: A bermed soil storage area, approximately 75' by 100' and consisting of several layers of 6-mil polyethylene sheeting, will be prepared. The excavated soil will be placed in 100 cubic yard stockpiles within the soil storage area. Each stockpile will be sampled in accordance with procedures included in Section 7.0 of the *Interim Corrective Action Plan.* The stockpiled material will not be delivered to the properly permitted landfill (hazardous or non-hazardous) until the sample results for each stockpile is received.
h. Profile Sampling of Soil for Characteristic Wastes: Section 7.0 presents sampling and analysis that will be performed on stockpiled, excavated material and unexcavated (remaining) soil. Based on the *Site Characterization Investigation* for the site, the contaminants of concern on the site are arsenic and lead. Therefore, the analyses of these samples will be for arsenic and lead, only.
i. Handling of Hazardous and Non-Hazardous Soils: Analytical results of composite

samples collected from stockpiled materials will show whether the soils are hazardous or non-hazardous. It is anticipated that the analytical results will show that the soils are non-hazardous and can be disposed at a permitted non-hazardous landfill. If the analytical results show the soils to be hazardous, the soil will either be disposed at a permitted hazardous landfill or the soil will be treated to render the soil non-hazardous.

j. Confirmation Sampling Procedures: These procedures are presented in Section 7.0 of the submitted *Interim Corrective Action Plan.*

k. Surveying: The excavated area and confirmation sampling points will be surveyed.

l. Backfilling: On-site, clean soil (soil with lead concentration less than 3,800 mg/kg) will be used to backfill the excavation. Twelve-inch (12") layers of backfill will be placed in the excavation and compacted to density of adjacent, unexcavated soils. Area will be graded to prevent ponding and to promote drainage.

m. Final Surface Preparation: After the excavation area(s) are backfilled, the surface will be seeded. Straw will be placed over exposed soils to prevent erosion, until the vegetation has grown.

4. Section 1.0 – Introduction: MDEQ is requesting that a timeframe be included as to when the *Final Corrective Action Plan* is submitted, after the property is purchased. MDEQ is suggesting 60 days. If this is agreeable to the Purchaser, this addition will be made.

5. Section 1.1 – Objectives and Rationale: MDEQ is requesting that certain additions be made to the Objectives and Rationale Section of the *Interim Corrective Action Plan.*

   a. Reduction of Long-Term Mobility: MDEQ is suggesting several approaches to limit the long-term mobility of contaminants (lead and arsenic) in the soil. We recognize that MDEQ is saying that simple asphalt capping alone may not be sufficient. We understand that further discussions with MDEQ will be required once the final plans for the property are known. As presented in Section 2.0 – Conceptual Plan, it is anticipated that a portion of the property will be capped with pavement and/or building slabs, if the property is purchased by the Mississippi State Port Authority. If the property is not purchased by the Mississippi State Port Authority, Hancock Bank will implement the *Interim Corrective Action Plan* and secure the site. The nature of the contamination (heavy metals which are basically insoluble), the age of the contamination (result of operation of Gulfport Fertilizer on the site from 1914 – 1920) and the data collected during the *Site Characterization Investigation* would all indicate that the contamination in the soil is not mobile. Therefore, if the property is not sold by Hancock Bank, we would negotiate this issue with the MDEQ.

   b. Restricted Use Agreed Order: Hancock Bank and the potential purchaser understand that a Restricted Use Agreed Order will be negotiated with and executed by the final

property owner.

c. Long-Term Groundwater Monitoring Plan: A long-term groundwater monitoring plan will be included in the *Final Corrective Action Plan*.

d. Ecological Risk Assessment: This is a new requirement that has not previously been discussed with MDEQ. After further discussions and negotiations with MDEQ, an Ecological Risk Assessment can be prepared for submittal with the *Final Corrective Action Plan*, if required.

6. Section 2.5 On-Site NORM Contamination: The on-site NORM contamination has been discussed with Mr. Goff of the MS Department of Health. According to Mr. Goff, the contamination is not regulated by the MS Department of Health regulations, but the *Interim Corrective Action Plan* addresses and the *Final Corrective Action Plans* will address actions that will be taken on-site to protect workers. We are presently reviewing our files to determine if a letter has been previously provided by MS Department of Health. If we find the letter, it will be provided to MDEQ. If we do not have this letter, one will be requested from Mr. Goff.

7. Section 2.5 Capping of Arsenic/Lead Contaminated Soil: The *Interim Corrective Action Plan* did not provide any specific information concerning the pavement and building foundation sections used by the Mississippi State Port Authority that would represent capping sections. If the Mississippi State Port Authority purchases the property, these sections will be presented in the *Final Corrective Action Plan* and, if necessary, negotiated with MDEQ. We feel that the paving and building sections that will probably be proposed in the *Final Corrective Action Plan* will be sufficient to protect site workers from dermal, respiratory and ingestion exposures to the soil.

If you have any questions concerning the information contained in this letter, please contact me. We appreciate MDEQ's receptiveness to the proposed Corrective Actions for this site, which will not only result in protecting human health and the environment, but will allow this site to be put back into commerce and result in significant economic development for the entire State of Mississippi.

Respectfully submitted,
COVINGTON AND ASSOCIATES CORPORATION

John F. Szabo, P.E.
Principal

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

June 27, 2005

FILE COPY

Mr. John M. Hairston, Chief Operations Officer
Hancock Bank, Inc.
P.O. Box 4019
Gulfport, Mississippi 39502

Re: Former Gulfport Fertilizer Site
Interim Corrective Action Plan, dated May 30, 2005
Gulfport, Mississippi

Dear Mr. Hairston:

The Mississippi Department of Environmental Quality (MDEQ) has completed a review of the above referenced document submitted by Covington and Associates on behalf of Hancock Bank. The *Interim Corrective Action Plan* cannot be approved for the following reasons:

1. Section 2.9 Health and Safety Plan: A Health and Safety Plan meeting the minimum requirements of 29 CFR 1910.120 shall be forwarded to the MDEQ for review.

2. Section 5.0 Remedial Goals: The current Tier I TRG (restricted) for lead is 1,700 mg/Kg and *not* 800 mg/Kg.

3. Section 7.0 Performance Monitoring Plan: A more detailed excavation plan should be prepared and submitted to MDEQ. At a minimum, the plan should detail the following:

    a. Any necessary site preparation activities (clearing & grubbing).
    b. Utility location and identification.
    c. Establishment of a secure work area.
    d. Establishment of a decontamination area and decontamination procedures.
    e. Storm water run-on/run-off control.
    f. Air monitoring and dust control measures.
    g. Removal, segregation, and stockpiling of contaminated soils.
    h. Profile sampling of soils for characteristic wastes.
    i. Handling of hazardous vs. non-hazardous soils.

j. Confirmation sampling procedures.
k. Surveying of excavated/remediated areas and confirmation sampling points.
l. Backfilling to final grade procedures.
m. Final surface preparation.

In addition, the MDEQ has the following general comments about the *Interim Corrective Action Plan*:

1. Section 1.0 Introduction: Once a final disposition of the property has occurred, Hancock Bank and/or the new property owner shall have sixty (60) days to submit a Final Corrective Action Plan to MDEQ for review/approval.

2. Section 1.1 Objectives and Rationale: Any Final Corrective Action Plan submitted to the MDEQ should include the following objectives:

   a. Reduction of the long-term mobility, toxicity and volume of the contaminants (lead and arsenic) that are to remain in-place. This objective can be accomplished thru a variety of methods including (but not limited to):
      i. Removal
      ii. Monitored natural attenuation in conjunction with a final cap that meets a minimum performance standard to be determined by the final property owner and the MDEQ.
      iii. In-Situ treatment/stabilization with binding agents (e.g. cement, lime, kiln dust, fly ash, silicates, clay, zeolites, etc.).
      iv. A combination of one or more methods.
   b. A restricted use Agreed Order with a property deed restriction will have to be executed between the final property owner and the MDEQ. This is necessary whenever contamination above the MDEQ Tier I TRG's (unrestricted) remains on the property. The Agreed Order will define the conditions under which the MDEQ will allow contaminated soils and/or groundwater to remain in place.
   c. A long-term groundwater monitoring plan will have to be submitted for review/approval by MDEQ. The plan should include the sampling frequency and analysis to be conducted. In addition, the plan should include contingencies to address contaminated groundwater that migrates beyond the proposed groundwater monitoring network and/or off-site.
   d. An Ecological Risk Assessment will have to be conducted. The purpose of the Ecological Risk Assessment is to determine if there are ecological receptors that could be adversely affected by allowing contamination to remain in place. This Risk Assessment

should be limited in scope and focused primarily on the wetland areas of the site.

3. Section 2.5 On-Site NORM Contamination: Radioactive NORM waste is regulated by the Mississippi State Department of Health (MSDH). The contact person is Mr. Robert Goff at 601-987-6893. Hancock Bank is encouraged to consult with the MSDH to determine if the site is subject to the MSDH regulations and if any remediation is necessary.

4. Section 2.6 Capping of Arsenic/Lead Contaminated Soil: The long-term reduction in mobility, toxicity and volume of the contaminants (lead and arsenic) may not be adequately accomplished with the application of asphalt pavement as a simple asphalt cap may be too permeable and not resistant to damage/degradation.

The MDEQ requests a written response to these comments by July 29, 2005. If you should have any questions or comments you may contact Brian Young at 601.961.5088.

Sincerely,

Brian Young
Project Manager

Tony Russell, Chief
Assessment & Remediation Branch

cc: Mr. John Szabo, Covington & Associates

Covington & Associates Corporation
Environmental Engineers and Consultants

May 31, 2005

Mr. Brian Young
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

Re: Interim Corrective Action Plan (CAP)
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi

Dear Brian:

As discussed in our meeting on April 27, 2005 with representatives from the Mississippi Department of Environmental Quality (MDEQ), the Mississippi State Port Authority (Port Authority) is considering purchasing the subject piece of property from Hancock Bank (Hancock). In order to insure that all proper procedures are followed, the Port Authority is requesting proposals from interested property owners having industrially zoned property of a minimum size with rail access on the north-south railroad serving the Port. These proposals are to be submitted to the Port Authority on June 2, 2005. These proposals will be reviewed and the Port Authority will make a final selection of the industrially zoned property it will purchase.

In hopes of having its property selected and being able to move quickly to close the hopeful sale, Hancock wants to proceed, as expeditiously as possible, with the implementation of the corrective activities that it anticipates it will be responsible for under a possible sale to the Port Authority. These anticipated corrective activities are presented in the enclosed *Interim Corrective Action Plan* (two copies enclosed). If the property is purchased by the Port Authority, a *Final Corrective Action Plan* will be submitted presenting the corrective activities that the Port Authority will be responsible for as well as those corrective activities Hancock will be responsible for. If the property is not purchased by the Port Authority, a *Final Corrective Action Plan* will be submitted presenting the corrective activities Hancock proposes to implement, beyond those presented in this *Interim Corrective Action Plan.*

P.O. Box 177 • 300 Davis Avenue, Suite 100 • Pass Christian, Mississippi 39571 • Office: 228-452-4999 • FAX: 228-452-0117
www.covingtonassociates.net

Please contact me with any questions about the enclosed *Interim Corrective Action Plan*. We greatly appreciate your assistance in moving this project forward as quickly as possible.

Very truly yours,
COVINGTON AND ASSOCIATES CORPORATION

John F. Szabo, P.E.
Principal

cc: Mr. John Hairston, Hancock Bank
Mr. Delma Powell, Hancock Bank
Ms. Joy Lambert Phillips, Hancock Bank
Mr. Don Allee, Mississippi State Port Authority
Mr. John Webb, Mississippi State Port Authority
Ms. Terese T. Wyly, Balch and Bingham, P.A.

Covington and Associates Corporation
P.O. Box 177
Pass Christian, MS 39571

confidential fax

To:	**Brian Young**
Fax Number:	601-961-5741
From:	**John F. Szabo**
Fax Number:	228-452-0117
Business Phone:	228-452-4999
Home Phone:	
Pages:	5
Date/Time:	4/29/2005 4:53:48 PM
Subject:	Summary of Corrective Action Plan (CAP) - Gulfport Fertilizer Site

Brian,

As discussed in our meeting on Wednesday, here is a summary of the CAP being proposed. Will talk to you early next week.

John Szabo

Covington & Associates Corporation

April 29, 2005

Mr. Brian Young
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

Re: Proposed Corrective Action Plan (CAP)
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi

Dear Brian:

Based on a meeting held April 27, 2005 with representatives from the Mississippi Department of Environmental Quality (MDEQ), Hancock Bank (Hancock), the Mississippi State Port Authority (Port Authority) and Covington and Associates Corporation (CAC), CAC is pleased to submit the following proposed Corrective Action Plan (CAP) for the subject site. As presented in the meeting, the subject site includes the Former Gulfport Fertilizer Plant Site (approximately 33 acres) and the adjacent Harrell Family property (approximately 112 acres) acquired by Hancock on March 28, 2005. The site now contains approximately 145 acres.

As discussed in the April 27th meeting, CAC is presenting this proposed, conceptual CAP in summary form presenting the main parts of the CAP so that we (Hancock, Port Authority and CAC) can be assured that the major aspects of the CAP are agreeable to MDEQ, so CAC can provide Hancock and the Port Authority an accurate cost estimate for implementing the CAP. The cost estimate for implementing the CAP, this letter and MDEQ's requested response to this letter will then be given to the Real Estate Appraiser being retained by the Port Authority to determine a value for the site. If the value for the site is as anticipated, the property will then be purchased by the Port Authority.

We are anticipating that certain aspects of the CAP will be immediately implemented by Hancock in order to present the property to the Port Authority in as a "clean" condition as possible. The items that Hancock will immediately implement will be presented after the proposed CAP is summarized.

Summary of Proposed Corrective Action Plan (CAP): A formal, more detailed Corrective Action Plan (CAP) will be submitted to MDEQ for review. It is anticipated that the formal CAP will be submitted on May 13, 2005. After an additional meeting with Hancock and the Port Authority, we anticipate the CAP to contain the following items:

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www.covingtonassociates.net

- **Deed Restrictions** will be placed on the property. These deed restrictions will be in accordance with MDEQ requirements and will address the locations of identified arsenic and lead soil and groundwater contamination, as well as Naturally Occurring Radioactive Material (NORM) contamination.

- **Security Fencing** will be placed around the property. The Port Authority is required, under Homeland Security Requirements, to construct a very secure fence around its operations. The fencing requirements generally include a 10-foot chain link fence with razor wire, lighting around the perimeter and motion detection. The Port Authority will be applying for a grant from the Federal Government to construct the fence around the entire site. The CAP will propose that if the Port Authority does not receive approval of this grant within eighteen (18) months from the date of property transfer, Hancock will provide the funds through an escrow account established at the sale of the property to construct a 6-foot chain link fence around the contaminated portion of the property. The CAP will show an anticipated layout of both fences – the Homeland Security Fence by the Port Authority and the "interim" security fence installed by Hancock.

- **Monitoring Well Installation** will be proposed in the CAP. Initially, CAC proposed installing an additional five (5) monitoring wells. After our discussion on April 22nd, CAC will be proposing two (2) additional monitoring wells within the area of the groundwater contamination plume. Next week, we will be providing you a proposed layout showing the seven (7) additional proposed monitoring wells, as well as the seven (7) existing monitoring wells presently on the site. We would request that MDEQ review the location of the seven (7) additional proposed monitoring wells as quickly as possible, so that CAC can have these monitoring wells installed as early in May as possible. Additionally, the CAP will propose that as the Port Authority develops the former Gulfport Fertilizer Site, the monitoring wells will be converted to flush-mounted wells or replacement monitoring wells will be installed. The CAP will also propose that the monitoring wells are sampled semi-annually for three (3) years, then annually for an additional five (5) years with the collected groundwater samples being analyzed for lead, arsenic, pH and the standard groundwater field parameters (temperature, conductivity and turbidity).

- **Excavation of Lead Contaminated Soil above 3,500 mg/kg** will be proposed in the CAP. Analysis of soil samples collected by CAC in 2002 and a statistical analysis of those results presented in CAC's *Supplemental Site Characterization Report* showed that lead contaminated soil having a concentration greater than 3,500 mg/kg exceeded 5.0 mg/l lead under the Toxicity Characteristic Leaching Procedures (TCLP) analysis. MDEQ, in its review of CAC's *Supplemental Site Characterization Report*, concurred with CAC's assessment. Therefore, the CAP will propose to excavate and dispose in a

properly permitted landfill, all lead contaminated soil having a lead concentration greater than 3,500 mg/kg. As soon as MDEQ has reviewed and approved the CAP, Hancock will want to have these soils removed from the site.

- **NORM Contamination** will be addressed in the proposed CAP. The two areas of NORM contaminated soil will be identified in the Deed Restrictions and will be secured by constructing a 6-foot fence area the areas. Signs will be placed on the fence warning persons about the presence of NORM contamination and telling them to keep out. The development plans prepared by the Port Authority will include capping the area with pavement or a building.

- **Capping of Arsenic/Lead Contaminated Soil** will be addressed in the CAP. On the former Gulfport Fertilizer Site (approximately 33 acres), arsenic contaminated soil above a concentration that CAC will propose in the CAP and lead contaminated soil above 800 mg/kg remaining on site, will be capped with pavement or a building. If the Port Authority's development plans do not include constructing a building or paving in the area of this soil contamination, the Port Authority will excavate the soil and move it to an area where paving or a building will be constructed. Until the Port Authority is ready to develop the areas where these soils are located, the soils will remain in place with existing vegetative cover.

- **Protection of Existing Wetlands** will be addressed in the CAP. It is anticipated that the high quality wetlands located along the northern extent of the property and another area of wetlands located near the northwest corner of the former Gulfport Fertilizer Property, will remain as wetlands. Areas of soil and groundwater contamination are located in these wetlands. The Port Authority will obtain necessary permits and approvals for any modifications to existing wetlands on the property.

- **Stormwater Run-off Controls (Quantity and Quality)** will be addressed in the CAP. As the Port Authority develops the site, the Port Authority will be required to provide detention basins in accordance with the City of Gulfport requirements. The Port Authority will also be required to address the quality of the stormwater runoff. If the Port Authority can provide some standard stormwater run-off control measures it is anticipated, these will be included in the CAP.

- **Health and Safety Issues** associated with implementing the CAP will be addressed. These issues will include air monitoring during excavation and construction activities and dermal protection of workers during excavation and construction activities.

As presented in the "Summary of Proposed Corrective Action Plan (CAP)" above, Hancock Bank is anticipating having the additional monitoring wells installed, the lead contaminated soil above 3,500 mg/kg removed and the security fence installed around the NORM contaminated area as soon as possible. To that end, CAC will be providing you with drawings showing the proposed monitoring well locations, the area of lead contaminated soil above 3,500 mg/kg and the proposed security fence around the NORM contaminated area. Once these drawings are submitted, we request that you review and approve, if possible, or discuss any proposed modifications with us as soon as possible so we can get these aspects of the CAP implemented immediately, even before, the entire CAP is approved. This will greatly assist the transfer of this property to the Port Authority.

Please contact me with any questions or issues you feel will need to be addressed in the CAP. We greatly appreciate your assistance on moving this project forward.

Very truly yours,
COVINGTON AND ASSOCIATES CORPORATION

John F. Szabo, P.E.
Principal

cc: Mr. John Hairston, Hancock Bank
Mr. Delma Powell, Hancock Bank
Ms. Joy Lambert Phillips, Hancock Bank
Mr. Don Allee, Mississippi State Port Authority
Mr. John Webb, Mississippi State Port Authority

Mississippi Department of Environmental Quality
Meeting Attendees List

Date: April 27, 2005

Company or Site: Gulfport Fertilizer

Location: DEQ/Southport

Participant	Company Organization	Email Address	Phone Number
John Szabo	Covington & Assoc.	jfszabo@bellsouth.net	228-216-1158
Phil Bass	MS DEQ	Phil_Bass@deq.state.ms.us	601/961-5100
charles chisolm	MS DEQ		601 961-5000
GEORGE SCHLOEGEL	HANCOCK BANK	GEORGE_SCHLOEGEL@HANCOCKBANK.COM	228 868 4906
JOHN HAILSTON	"	JOHN_HAILSTON@HANCOCKBANK.COM	228 868 4926
DON Allee	PORT GULFPORT	dra@shipmspa.com	2288654300
John Webb	" "	jwebb@shipmspa.com	"
JERRY BANKS	MSDEQ	Jerry_Banks@deq.state.ms.us	601-961-5221

Meeting Summary:

Mississippi Department of Environmental Quality
Meeting Attendees List

Date: December 13, 2004

Company or Site: Gulfport Fertilizer

Location: 101 West Capitol St.

Participant	Company Organization	Email Address	Phone Number
Tony Russell	MDEQ	Tony_Russell@deq.state.ms.us	(601) 961-5318
Brian Young	MDEQ	Brian_Young@deq.state.ms.us	(601) 961-5088
John Szabo	Covington & Ass.	jfszabo@bellsouth.net	228-216-1153
PATRICK Chubb	Covington Associates	Chubb@covingtonAssociates.net	228.860.0554
Lars Larson	Covington Assoc.	larslarson@bellsouth.net	228-327-0311

Meeting Summary:

The meeting began at 1303 with John Szabo introducing the site with a narrative of the site history leading up to a summary of the recent finding at the site. Mr. Szabo then briefly talked about Hancock Bank's attempts to acquire the adjacent property and that a sales agreement should be forthcoming in the next few days. The discussion then turned to the conditions of the site and adjacent property with respect to the wetlands delineation, contamination delineation (soils and groundwater) and the physical characteristics of the site (vegetation, drainage, topography, etc.). The meeting then turned to a general discussion of a corrective action plan (CAP). The CAP would consist of a deed restriction and securing the site (fencing) followed by monitored natural attenuation at the site. There were some general inputs by MDEQ on what would be required for implementation of this type of CAP. The discussion then turned to a draft letter from MDEQ and the requirements for the monitoring well placement/spacing. The meeting adjourned at 1400. After the meeting there was more discussion of the monitoring well placement/spacing with an agreement that more potentiometric data was necessary prior to a final decision.

AGENDA

FORMER GULFPORT FERTILIZER SITE
GULFPORT, MS

Date of Meeting: December 13, 2004
Time of Meeting: 1:30 p.m.
Location of Meeting: Uncontrolled Sites Division
West Capitol, Jackson, MS

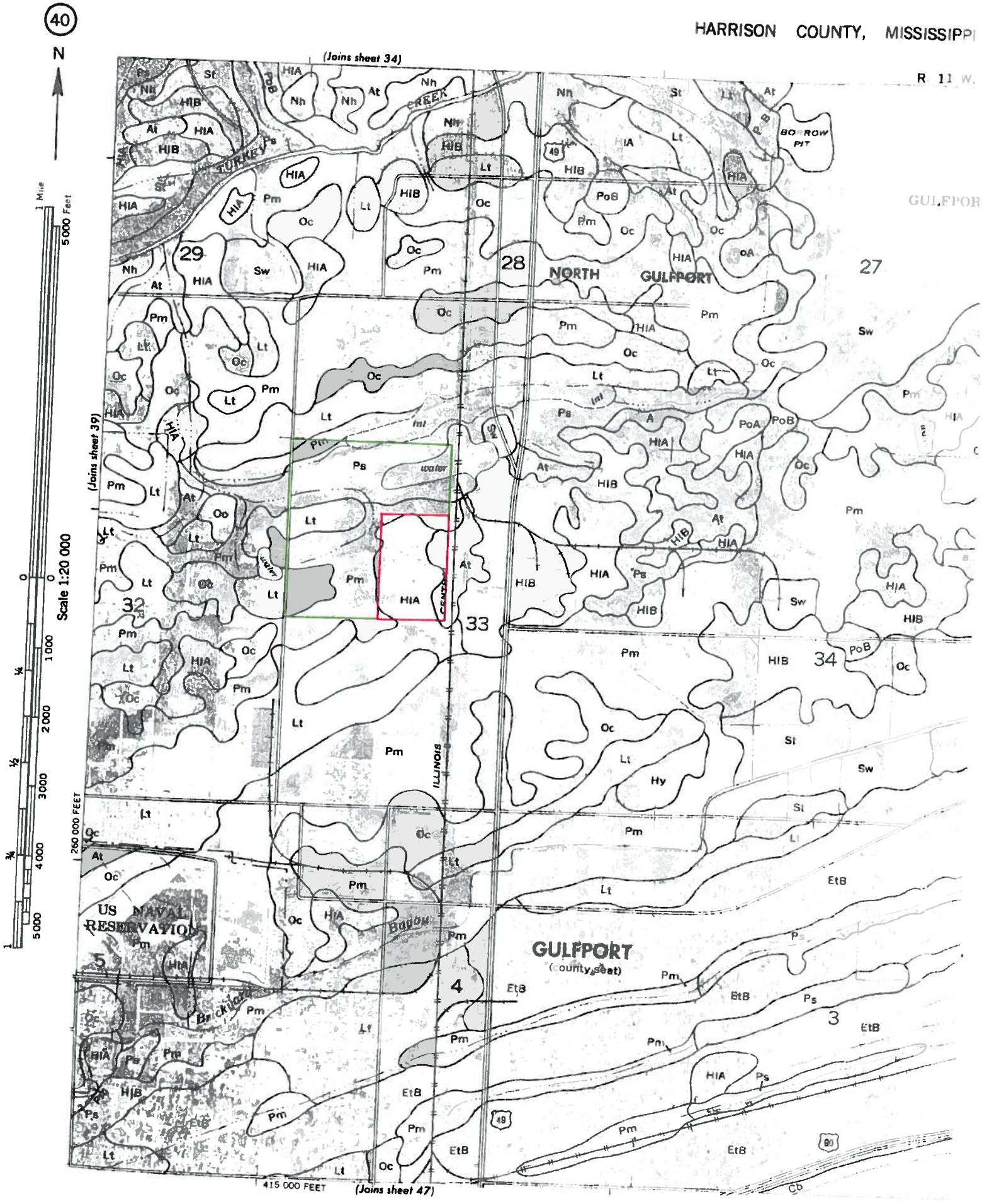
Attendees:

MDEQ – Tony Russell and Brian Young
Covington & Associates – John Szabo, Lars Larson and Patrick Chubb

I. Project Overview
   A. Summary of Site Characterization Findings
   B. Installation of Off-Site Monitoring Wells
   C. Acquisition of Off-Site Property
   D. Conditions of Off-Site Property

II. Corrective Action Options
   A. Discussion of Available Options
   B. Advantages/Disadvantages of Each Option
   C. Additional Information Required to Evaluate Each Option
   D. Additional Permitting/Approvals Required for Each Option

Gulfport Fertilizer Site


HARRISON COUNTY, MISSISSIPPI
R 11 W.
(Joins sheet 34)
(Joins sheet 39)
(Joins sheet 47)
NORTH GULFPORT
GULFPORT
(county seat)
US NAVAL RESERVATION
Bayou Bernard
CREEK
TURKEY
BORROW PIT
Scale 1:20 000
1 Mile
5000 Feet
260 000 FEET
415 000 FEET
N
40
27
28
29
32
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34
5
4
3

HANCOCK
BANK

JOY LAMBERT PHILLIPS
General Counsel

December 1, 2004

Via Facsimile and U.S. Mail
Brian Young, Project Manager
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385
Fax: (601) 354-6612

RE: Gulfport Fertilizer Site

Dear Mr. Young:

Thank you for taking the time to talk with me Monday, November 29, 2004, regarding the Gulfport Fertilizer Site. You had previously requested a corrective action plan for the contaminated soils (both on and offsite) be submitted by Friday, December 3, 2004. As we discussed, Hancock Bank has been in negotiations for the purchase of a portion of the adjacent property, which portion would include the offsite contamination. These negotiations are moving forward in a positive direction and we believe we are close to reaching an agreement as to this purchase.

As we further discussed, the purchase of a portion of the adjacent property, which purchase would include the offsite contamination, would significantly impact our corrective action plan to be submitted. We would like to be able to submit the corrective action plan after we have completed the purchase of the property. We are optimistic that an agreement can be signed before yearend (we have committed to close thirty days from the date a purchase-sale agreement is executed by both parties) and therefore would request that you allow us an additional 60 days from December 3, 2004 within which to submit a corrective action plan. When we talked Monday, you indicated such an extension would probably be permissible, given the status of our negotiations. By my calculations, the 60-day extension would make our corrective action plan due February 1, 2005. We appreciate your consideration of this request.

I believe you have already received the investigation assessment plan to evaluate the extent of the groundwater contamination offsite, but should you need anything further on this matter, please do not hesitate to contact me. It is my understanding that our consultant, John Szabo, with Covington Associates will be in touch with you within the

next day or so regarding this. Again, thank you for taking the time to discuss this matter and for you consideration of our extension request.

Sincerely,

Joy Lambert Phillips
General Counsel

cc: John Szabo
Covington & Associates

HANCOCK BANK LEGAL OFFICE

FACSIMILE TRANSMITTAL SHEET

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

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Date: 12-1-04

To: Brian Young, Project Manager
MS Dept. of Environmental Quality

Fax No.: 601-354-6612

From: Joy Lambert Phillips
Phone: 228-868-4445
Fax 228-868-4496

Number of Pages Transmitting: 3 **(Including cover page)**

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

Comments:

next day or so regarding this. Again, thank you for taking the time to discuss this matter and for you consideration of our extension request.

Sincerely,

Joy Lambert Phillips
General Counsel

cc: John Szabo
Covington & Associates

Covington & Associates Corporation
Environmental Engineers and Consultants

November 12, 2004

Mr. Brian Young
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

Re: Proposed Monitoring Well Locations (Off-Site)
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi

Dear Brian:

Covington and Associates Corporation (CAC), based on groundwater samples (filtered and unfiltered) collected on October 20 and 21, 2004, Is proposing TO install four (4) additional monitoring wells at the approximate locations shown on attached Figure 1. This letter will present the information on which these recommended monitoring well locations are based.

Twelve (12) borings (OSGW-1 through OSGW-12) were advanced off-site on October 20 and 21, 2004. The locations of the borings are shown on Figure 1. Groundwater samples were collected from each boring. Each groundwater sample was analyzed for arsenic and total solids. The arsenic analysis was for total arsenic using an unfiltered groundwater sample and dissolved arsenic using a filtered groundwater sample. The analytical reports for the groundwater samples are attached. We are also attaching a table summarizing the analytical results.

Figure 1 shows the approximate limit of groundwater exceeding the regulatory limit for arsenic (0.010 mg/l). In determining the approximate limit of groundwater exceeding the arsenic regulatory limit, CAC used the filtered groundwater results collected from OSGW-1 through OSGW-12 and the analytical results from the last quarterly groundwater sampling of the on-site monitoring wells (Sampling Round 8). CAC feels that the filtered groundwater analyses are more representative of the results that will be seen when monitoring wells are sampled.

The final location of each monitoring well will be determined based on field conditions. The four (4) proposed locations – one (1) on the Gulfport Fertilizer Site and three (3) on the adjacent property (Off-Site) will be installed in accordance with the previously approved Work Plan. In order to keep consistency between monitoring wells, each well will be installed to a depth of 15'.

CAC, on behalf of its client – Hancock Bank, requests permission from the Mississippi Department of Environmental Quality (MDEQ) to install the four (4) off-site monitoring wells at

the approximate locations shown on Figure 1. Since three of these monitoring wells will be located on the adjacent property and since some clearing will be required in order to get drilling equipment to the proposed locations, CAC and Hancock Bank will have to coordinate with and get permission from the adjacent property owners to install the proposed monitoring wells. Once the monitoring wells are installed, CAC will collect groundwater samples from the on-site and off-site monitoring wells semi-annually for two (2) years. A groundwater sampling report will be submitted to MDEQ approximately forty-five (45) days after each sampling event.

If you have any questions concerning this request, please contact us. If this request meets with your approval, please send us your approval of this approach. We appreciate your input and help on this project and look forward to hearing from you.

Very truly yours,
COVINGTON AND ASSOCIATES CORPORATION

John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank/Enclosures

TABLES

Gulfport Fertilizer Site

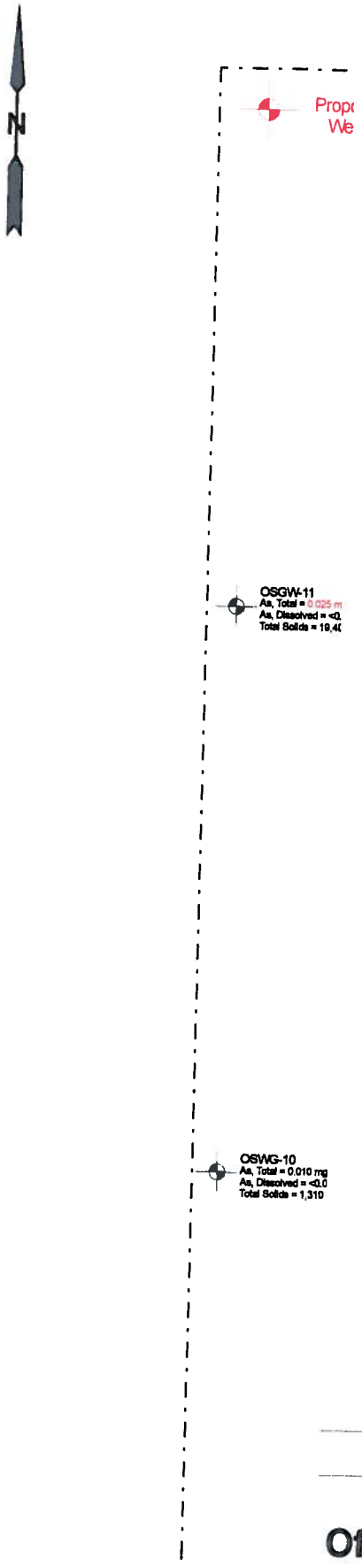
Off-Site Groundwater Investigation
October 20 and 21, 2004

Sample Location	Arsenic (Total)	Arsenic (Dissolved)	Total Solids
OSGW-1	**0.10**	**0.028**	2,210
OSGW-2	**0.71**	**0.50**	12,700
OSGW-3	**0.20**	**0.02**	14,700
OSGW-4	**0.011**	<0.010	4,390
OSGW-5	<0.010	<0.010	331
OSGW-6	<0.010	<0.010	518
OSGW-7	<0.010	<0.010	583
OSGW-8	<0.010	<0.010	762
OSGW-9	**0.092**	<0.010	14,400
OSGW-10	**0.010**	<0.010	1,310
OSGW-11	**0.025**	<0.010	19,400
OSGW-12	<0.010	<0.010	391

Notes:

1. All arsenic & total solid concentrations are expressed in mg/L (ppm).
2. Arsenic concentrations exceeding MDEQ Tier 1 Groundwater MCL for arsenic (0.010 mg/L) are shaded.

FIGURE



LEGEND:

- On-Site, Existing Monitoring Well
- 0.035 mg/l/<0.010 mg/l — Duplicate Analysis - Arsenic, Sampling Round 8
- Arsenic Isopleth, Sampling Round 8 (On-Site)
- Off-Site Boring (October 20 and 21, 2004)
- As, Total = 0.011 mg/l; As, Dissolved = <0.010 mg/l; Total Solids = 4,390 mg/l — Analytical Results for Groundwater Samples Collected October 20 and 21, 2004
- Projected Arsenic Isopleth (Off-Site)
- Proposed Monitoring Well Location

NOTES:

1.) Round 8 samples collected March 4, 2004.
2.) Off-Site Groundwater samples collected October 20 and 21, 2004.
3.) Arsenic concentrations <0.010 mg/l assumed to be 0.0050 mg/l for calculating isopleth.
4.) Where there are duplicate analysis, first listed analysis used for calculating isopleth.
5.) Results exceeding MDEQ's Tier 1 TRG for arsenic in groundwater (0.010 mg/l) are shown in red.
6.) Dissolved arsenic concentrations used for off-site arsenic isopleth.

COVINGTON & ASSOCIATES CORPORATION
PASS CHRISTIAN, MISSISSIPPI

Former Gulfport Fertilizer Site
Gulfport, MS

Off-Site Groundwater Borings

DATE Nov. 11, 2004	PROJECT NO. 9397		FIG. 1
SCALE As Shown	FILE C:/CAC/GULFPORT FERTILIZER SITE/GROUNDWATER		

ANALYTICAL REPORTS
AND
CHAIN-OF-CUSTODY FORM

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-01

Sample ID : OSGW-1

Site ID :

Collected By : Lars Larson
Collection Date : 10/20/04 10:05

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	2210	1.00	mg/l	160.3	10/27/04	1
Arsenic	0.10	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	0.028	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ -0612, MN - 047-999-395, NY - 11742

Note:
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-04

Sample ID : OSGW-2

Site ID :

Collected By : Lars Larson
Collection Date : 10/20/04 14:10

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	12700	1.00	mg/l	160.3	10/27/04	1
Arsenic	0.71	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	0.50	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-03

Sample ID : OSGW-3

Site ID :

Collected By : Lars Larson
Collection Date : 10/20/04 13:50

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	14700	1.00	mg/l	160.3	10/27/04	1
Arsenic	0.20	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	0.017	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-02

Sample ID : OSGW-4

Site ID :

Collected By : Lars Larson
Collection Date : 10/20/04 13:00

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	4390	1.00	mg/l	160.3	10/27/04	1
Arsenic	0.011	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
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Note:
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-07

Sample ID : OSGW-5

Site ID :

Collected By : Lars Larson
Collection Date : 10/21/04 09:45

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	331.	1.00	mg/l	160.3	10/28/04	1
Arsenic	BDL	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ -0612, MN - 047-999-395, NY - 11742

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-09

Sample ID : OSGW-6

Site ID :

Collected By : Lars Larson
Collection Date : 10/21/04 11:10

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	518.	1.00	mg/l	160.3	10/28/04	1
Arsenic	BDL	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-10

Sample ID : OSGW-7

Site ID :

Collected By : Lars Larson
Collection Date : 10/21/04 12:10

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	583.	1.00	mg/l	160.3	10/28/04	1
Arsenic	BDL	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-06

Sample ID : OSGW-8

Site ID :

Collected By : Lars Larson
Collection Date : 10/20/04 15:50

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	762.	1.00	mg/l	160.3	10/27/04	1
Arsenic	BDL	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
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Note:
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

ESC Sample # : L174751-05

Sample ID : OSGW-9

Site ID :

Collected By : Lars Larson
Collection Date : 10/20/04 15:15

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	14400	1.00	mg/l	160.3	10/27/04	1
Arsenic	0.092	0.010	mg/l	6010B	10/30/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

ESC Sample # : L174751-12

Site ID :

Project # : 9397

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

Sample ID : OSGW-10

Collected By : Lars Larson
Collection Date : 10/21/04 13:45

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	1310	1.00	mg/l	160.3	10/28/04	1
Arsenic	0.010	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
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Note:
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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

October 30, 2004

ESC Sample # : L174751-11

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

Site ID :

Sample ID : OSGW-11

Project # : 9397

Collected By : Lars Larson
Collection Date : 10/21/04 12:55

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	19400	1.00	mg/l	160.3	10/28/04	1
Arsenic	0.025	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ -0612, MN - 047-999-395, NY - 11742

Note:
The reported analytical results relate only to the sample submitted.

Reported: 10/30/04 19:30 Printed: 10/30/04 19:30

ENVIRONMENTAL
SCIENCE CORP.

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

October 30, 2004

Mr. Lars Larson
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

ESC Sample # : L174751-08

Date Received : October 22, 2004
Description : Gulfport Fertilizer GW

Site ID :

Sample ID : OSGW-12

Project # : 9397

Collected By : Lars Larson
Collection Date : 10/21/04 10:45

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Total Solids	391.	1.00	mg/l	160.3	10/28/04	1
Arsenic	BDL	0.010	mg/l	6010B	10/28/04	1
Arsenic,Dissolved	BDL	0.010	mg/l	6010B	10/29/04	1

Jeff Carr, ESC Representative

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ -0612, MN - 047-999-395, NY - 11742

Note:
The reported analytical results relate only to the sample submitted.

Reported: 10/30/04 19:30 Printed: 10/30/04 19:30

Covington & Associates

300 Davis Ave Suite 100
Pass Christian,MS 39571

Alternate billing information:

Report to: **Mr. Lars Larson**

Email: **larslarson@bellsouth.net**

Project Description: **Testing for Gulfport Fertilizer Area 2 G**

City/State Collected: Gulfport, MS

Phone: **(615) 504-1619**
FAX: **(615) 452-0117**

Client Project #: **9397**

Lab Project #: **COVASSOC-9397 GW 2**

Collected by (print): Lars Larson

Site/Facility ID#:

P.O.#:

Collected by (signature):

Packed on Ice N ___ Y X

Rush? (Lab MUST Be Notified)
___Same Day 200%
___ Next Day.....100%
___ Two Day.....50%

Date Results Needed: 10/28/04

Email? ___No X Yes
FAX? No Yes

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDICP 500mlHDPE-NoPres	ASICP 250mlHDPE-HNO3	TS 250mlHDPE-NoPres	Remarks/Contaminant	Sample # (lab only)
OS6W-1	GRAB	GW		10/21/04	1005	3	X	X	X		L12175-01
OS6W-4		GW			1300	3	X	X	X		-02
OS6W-3		GW			1350	3	X	X	X		-03
OS6W-2		GW			1410	3	X	X	X		-04
OS6W-9		GW			1515	3	X	X	X		-05
OS6W-8		GW			1550	3	X	X	X		-06
OS6W-5		GW		10/21/04	945	3	X	X	X		-07
OS6W-12		GW			1045	3	X	X	X		-08
OS6W-6		GW			1110	3	X	X	X		-09

*Matrix: **SS** - Soil **GW** - Groundwater **WW** - WasteWater **DW** - Drinking Water **OT** - Other_____

Remarks:

pH _____ Temp _____

Flow _____ Other _____

Chain of Custody
Page 1 of 2

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (800) 767-5859
FAX (615) 758-5859

Acctnum: **COVASSOC** (lab use only)
Template/Prelogin: **T13088/ P126365**
Cooler #: 10/11DS
Shipped Via: **FedEX Ground**

8454 2481 3431

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
	10/21/04	1500	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)

Samples returned via: ☐ UPS ☒ FedEx ☐ Courier ☐

Temp: 3.1°C Bottles Received: 36

Date: 10/22/04 Time: 9:05 AM

Condition: dc (lab use only)

pH Checked: C2 NCF:

Covington & Associates

300 Davis Ave Suite 100
Pass Christian,MS 39571

Alternate billing information:

Chain of Custody
Page 2 of 2

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (800) 767-5859
FAX (615) 758-5859

Report to: Mr. Lars Larson
Email: larslarson@bellsouth.net

Project Description: Testing for Gulfport Fertilizer Area 2 G
City/State Collected: Gulfport, MS

Phone: (615) 504-1619
FAX: (615) 452-0117
Client Project #: 9397
Lab Project #: COVASSOC-9397 GW 2

Collected by (print): Lars Larson
Site/Facility ID#:
P.O.#:

Collected by (signature):
Packed on Ice N Y

Rush? (Lab MUST Be Notified)
___Same Day 200%
___ Next Day.....100%
___ Two Day 50%

Date Results Needed: 10/28/04
Email? __No X Yes
FAX? No Yes

Acctnum: COVASSOC (lab use only)
Template/Prelogin: T13088/ P126365
Cooler #: 10/11 DS
Shipped Via: FedEX Ground

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDICP 500mlHDPE-NoPres	ASICP 250mlHDPE-HNO3	TS 250mlHDPE-NoPres	Remarks/Contaminant	Sample # (lab only)
OSGW-7	GRAB	GW		10/21/04	1210	3	X	X	X		L17475-10
OSGW-11	↓	GW		↓	1255	3	X	X	X		-11
OSGW-10	↓	GW		↓	1345	3	X	X	X		-12
		GW				3	X	X	X		

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

Remarks:

pH _____ Temp _____

Flow _____ Other _____

3434 3431 3431

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
	10/21/04	1500	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)

Samples returned via: ☐ UPS ☒ FedEx ☐ Courier ☐ _____
Temp: 3.1°C Bottles Received: 36
Date: 10/22/04 Time: 9:00AM

Condition: (lab use only) OK
pH Checked: n
NCF:

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

October 4, 2004

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

Re: Gulfport Fertilizer Site
Supplemental Off-Site Characterization Report dated July 29, 2003
Revised December 1, 2003
Historical Groundwater Monitoring Report dated August 10, 2004
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has completed a review of the above referenced documents submitted by Covington and Associates Corporation on behalf of Hancock Bank. The MDEQ believes the site has been adequately characterized with the exception of groundwater to the north and west of the site with respect to arsenic. Therefore, the MDEQ is requesting a Corrective Action Plan (CAP) for the contaminated soils (both on and off-site) be submitted by Friday, December 3, 2004. In addition, an investigation/assessment plan should be submitted to evaluate the extent of the groundwater contamination off-site. This plan should be submitted by Friday, November 5, 2004.

Sincerely,

Brian Young
Project Manager

Tony Russell, Chief
Assessment & Remediation Branch

cc: John F. Szabo, P.E. Covington and Associates

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

January 23, 2004

FILE COPY

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

RE: Gulfport Fertilizer Site
Seventh Groundwater Sampling Event Report dated December 20, 2003
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality has reviewed the above referenced report submitted by Covington and Associates Corporation on behalf of Hancock Bank and concurs with the report findings. If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Penny Johnston, P.E.
Project Manager

Tony Russell, Chief
Assessment Remediation Branch

cc: John F. Szabo, P.E. Covington & Associates

C:\Documents and Settings\PJohnston.OPC\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer 7th GW Sampling Report Concurrence Letter 1-21-04 (pj).doc

Covington & Associates Corporation
Environmental Engineers and Consultants

December 8, 2003

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
101 West Capitol Street, 2nd Floor
Jackson, Mississippi 39201

Re: Transmittal of Revisions to
Supplemental Off-Site Characterization Report
Revised: December 1, 2003
Former Gulfport Fertilizer Site
33rd Street
Gulfport, Mississippi

Dear Penny:

As we discussed on December 2nd, we are enclosing:

- a "stamped" cover page for the *Revised Supplemental Off-Site Characterization Report*;
- Table 1; and
- Table 3

Please include these in MDEQ's copies of the *Revised Supplemental Off-Site Characterization Report*. Please call me with any questions you may have. We appreciate your assistance on this project and look forward to your comments on the report.

Very truly yours,

John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank, w/enclosures

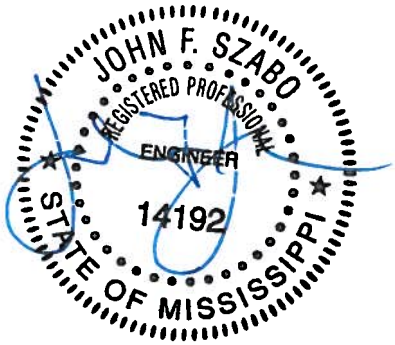
Corporate Office: P.O. Box 177 • 112 Davis Avenue • Pass Christian, Mississippi 39571 • Office: 228-452-4999 • FAX: 228-452-0117
www.covingtonassociates.net

SUPPLEMENTAL OFF-SITE CHARACTERIZATION REPORT

Former Gulfport Fertilizer Site
33rd Street
Gulfport, Mississippi

Prepared for
Hancock Bank
2510 14th Street
Gulfport, MS 39501

July 29, 2003
Revised: December 1, 2003



Prepared by:
COVINGTON AND ASSOCIATES CORPORATION
Delivery Address: 300 Davis Avenue, Suite 100
Mailing Address: P. O. Box 177
Pass Christian, Mississippi 39571
(228) 452-4999
FAX: (228) 452-0117

Table 1
Summary of Off-Site Borings
Former Gulfport Fertilizer Site
Gulfport, MS

Client: Hancock Bank

Boring Location	Surface Elev.	Bottom of Boring	Bottom of Boring Elev.	G.W. BGS	GW Elev.	Comments
OS-1	24.03	16	8.03	2.0	22.03	
OS-2	24.58	16	8.58	1.5	23.08	
OS-3	26.19	16	10.19	2.0	24.19	
OS-4	25.58	22	3.58	2.0	23.58	Confining Layer
OS-5	25.85	16	9.85	2.0	23.85	
OS-6	25.23	16	9.23	0.4	24.83	
OS-7	25.86	16	9.86	4.0	21.86	
OS-8	26.19	20	6.19	0.5	25.69	Confining Layer
OS-9	26.99	16	10.99	2.0	24.99	
OS-10	28.62	16	12.62	0.5	28.12	
OS-11	30.13	16	14.13	6.0	24.13	
OS-12	30.10	20	10.10	2.0	28.10	Confining Layer
OS-13	29.88	16	13.88	2.0	27.88	
OS-15	29.90	16	13.90	2.0	27.90	
OS-16	24.01	8	16.01	N.R.		
OS-17	23.37	8	15.37	2.0	21.37	
OS-18	25.29	8	17.29	2.0	23.29	
OS-19	25.19	8	17.19	2.0	23.19	
OS-20	25.74	8	17.74	2.0	23.74	
OS-21	25.15	8	17.15	2.0	23.15	
OS-22	26.36	8	18.36	2.0	24.36	
OS-23	26.40	8	18.40	2.0	24.40	
OS-24	25.20	8	17.20	0.0	25.20	
OS-25	24.76	8	16.76	0.0	24.76	
OS-26	24.81	8	16.81	0.0	24.81	
OS-27	24.91	10	14.91	2.0	22.91	
OS-28	24.55	10	14.55	0.0	24.55	
OS-29	24.77	8	16.77	0.0	24.77	
OS-30	24.75	8	16.75	0.0	24.75	
OS-31	24.88	10	14.88	0.0	24.88	
OS-32	25.24	10	15.24	0.0	25.24	
OS-33	23.32	10	13.32	0.0	23.32	
OS-34	23.83	8	15.83	0.0	23.83	
OS-35	24.42	10	14.42	0.0	24.42	
OS-36	22.64	10	12.64	0.0	22.64	
OS-37	23.20	10	13.20	0.0	23.20	
OS-38	23.18	10	13.18	N.R.		
OS-39	22.27	16	6.27	0.0	22.27	
OS-40	22.94	10	12.94	0.0	22.94	
OS-41	23.03	10	13.03	4.0	19.03	
OS-42	23.23	10	13.23	6.0	17.23	
OS-43	23.21	10	13.21	4.0	19.21	
OS-44	24.98	10	14.98	4.0	20.98	
OS-45	22.98	10	12.98	4.0	18.98	
OS-46	22.17	10	12.17	4.0	18.17	
OS-47	22.05	10	12.05	2.0	20.05	
OS-48	21.67	10	11.67	2.0	19.67	
OS-49	21.81	10	11.81	4.0	17.81	
OS-50	21.51	10	11.51	6.0	15.51	
OS-51	21.42	10	11.42	8.0	13.42	
OS-52	21.26	10	11.26	0.0	21.26	
OS-53	21.25	10	11.25	4.0	17.25	
OS-54	24.57	10	14.57	2.0	22.57	
OS-55	24.82	10	14.82	4.0	20.82	
OS-54A	21.10	9	12.10	0.5	20.60	
OS-55A	21.62	9	12.62	0.5	21.12	
OS-56	21.37	10	11.37	0.5	20.87	
OS-57	21.47	10	11.47	0.5	20.97	
OS-58	21.14	10	11.14	0.5	20.64	
OS-59	21.15	10	11.15	0.5	20.65	
OS-60	20.90	10	10.90	0.5	20.40	
OS-61	20.65	10	10.65	0.5	20.15	
OS-62	20.31	10	10.31	0.5	19.81	

N.R. - No Reading

Table 1
Summary of Off-Site Borings
Former Gulfport Fertilizer Site
Gulfport, MS

Client: Hancock Bank

Boring Location	Surface Elev.	Bottom of Boring	Bottom of Boring Elev.	G.W. BGS	GW Elev.	Comments
OS-63	20.72	10	10.72	0.5	20.22	
OS-64	20.62	9	11.62	0.5	20.12	
OS-65	20.66	9	11.66	0.5	20.16	
OS-66	20.26	9	11.26	0.5	19.76	
OS-67	20.44	9	11.44	0.5	19.94	
OS-68	20.59	9	11.59	0.5	20.09	
OS-69	20.66	9	11.66	0.5	20.16	
OS-70	20.69	9	11.69	0.5	20.19	
OS-71	20.78	9	11.78	2.0	18.78	
OS-72	20.80	9	11.80	0.5	20.30	
OS-73	20.39	9	11.39	0.5	19.89	
OS-74	20.35	9	11.35	0.5	19.85	
OS-75	20.21	9	11.21	0.5	19.71	
OS-76	21.60	9	12.60	0.5	21.10	
OS-77	N.R.	4	N.R.	N.R.	N.R.	
OS-78	N.R.	4	N.R.	N.R.	N.R.	
OS-79	N.R.	4	N.R.	N.R.	N.R.	
OS-80	N.R.	4	N.R.	N.R.	N.R.	
OS-81	N.R.	4	N.R.	N.R.	N.R.	
OS-82	N.R.	4	N.R.	N.R.	N.R.	
OS-83	N.R.	4	N.R.	N.R.	N.R.	
OS-84	N.R.	4	N.R.	N.R.	N.R.	
OS-85	N.R.	4	N.R.	N.R.	N.R.	
OS-86	N.R.	4	N.R.	N.R.	N.R.	
OS-87	N.R.	4	N.R.	N.R.	N.R.	
OS-88	N.R.	4	N.R.	N.R.	N.R.	
OS-89	N.R.	4	N.R.	N.R.	N.R.	
OS-90	N.R.	4	N.R.	N.R.	N.R.	
OS-91	N.R.	4	N.R.	N.R.	N.R.	

N.R. - No Reading

Table 3
Area of Off-Site Soil Contamination
Former Gulfport Fertilizer Site
Gulfport, MS

Client: Hancock Bank

Soil Interval ('BGS)	Area of Arsenic Contamination (Ac.)	Area of Lead Contamination (Ac.)
0'-2'	9.3	1.73
2'-4'	6.08	None
4'-6'	0.91	None
6'-8'	0.99	None
8'-12'	0.22	None
>12'	0.15	None

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

FILE COPY

MEMORANDUM

TO: Gulfport Fertilizer Site File

FROM: Penelope Johnston PJ

DATE: December 8, 2003

SUBJECT: Site Visit

On December 2, 2003, I traveled to the above referenced site to witness a quarterly groundwater sampling event for the site. Mr. Lars Larson of Covington & Associates was on site to conduct the sampling. I collected a split sample from monitoring well one (MW-1) for arsenic and lead. The sample was taken to the OPC lab for analysis.

C:\Documents and Settings\PJohnston.OPC\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer Site Visit Memo 12-8-03 (pj).doc

Covington & Associates Corporation
Environmental Engineers and Consultants

December 2, 2003

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
101 West Capitol Street, 2nd Floor
Jackson, Mississippi 39201

Re: Transmittal of Supplemental Off-Site Characterization Report
Revised: December 1, 2003
Former Gulfport Fertilizer Site
33rd Street
Gulfport, Mississippi

FILE COPY

Dear Penny:

On behalf of our client, Hancock Bank, Covington and Associates Corporation (CAC) is pleased to submit two (2) copies of the *Supplemental Off-Site Characterization Report, Revised: December 1, 2003* for the subject site. The original *Supplemental Off-Site Characterization Report* was submitted on July 29, 2003. This revised report replaces the one submitted July 29th.

The enclosed report presents additional off-site soil data collected on the property adjacent to the subject site in accordance with the *Work Plan Off-Site/Source Area Soils and Groundwater Sampling* prepared by Butler Services of Mississippi, Inc. and modified by CAC on November 20, 2001 and CAC's letter of April 7, 2003 concerning additional off-site soil sampling. The supplemental off-site soil investigation was approved by MDEQ on April 21, 2003. The Work Plan was implemented by CAC in April, May, September, October and November 2003.

We are presently completing a Corrective Action Plan, which will generally include:

- acquiring the contaminated portion of the adjacent property,
- installing silt and storm water control measures on the subject property and the acquired portion of the adjacent property to prevent soils from being carried off-site,
- fencing the contaminated portion of the site to prevent unauthorized access, and
- establishing institutional controls for the site.

We are anticipating that the Corrective Action Plan will be submitted to MDEQ by the end of the year.

Because of the anticipated Corrective Action Plan, we feel that defining the horizontal extent of

P.O. Box 177 • 300 Davis Avenue, Suite 100 • Pass Christian, Mississippi 39571 • Office: 228-452-4999 • FAX: 228-452-0117
www.covingtonassociates.net

the arsenic and lead contamination on the adjacent property is of paramount importance. The data collected and presented in this report accomplishes this. The vertical delineation of the off-site arsenic and lead contamination is not as important, since the Corrective Action Plan does not anticipate excavating the contaminated off-site soils. As presented in the report, there are some areas on the adjacent property where vertical delineation of the arsenic contamination has not been achieved.

As you review the enclosed report, please call me with any questions you may have. We appreciate your assistance on this project and look forward to your comments on the enclosed report.

Very truly yours,

John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank, w/enclosures

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

November 10, 2003

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

FILE COPY

RE: Gulfport Fertilizer Site
Fifth Groundwater Sampling Round Report dated June 26, 2003, and
Sixth Groundwater Sampling Round Report dated September 29, 2003
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality has reviewed the above referenced reports submitted by Covington and Associates Corporation on behalf of Hancock Bank and concurs with the reports findings. If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Penny A. Johnston

Penny Johnston, P.E.
Project Manager

DA Russell

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E. Covington & Associates

C:\Documents and Settings\PJohnston.OPC\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer 5th & 6th GW Sampling Report Concurrence Letter 11-7-03 (pj).doc

Covington & Associates Corporation
Environmental Engineers and Consultants

July 29, 2003

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
101 West Capitol Street, 2nd Floor
Jackson, Mississippi 39201

Re: Transmittal of Supplemental Off-Site Characterization Report
Former Gulfport Fertilizer Site
33rd Street
Gulfport, Mississippi

FILE COPY

Dear Penny:

On behalf of our client, Hancock Bank, Covington and Associates Corporation (CAC) is pleased to submit two (2) copies of the *Supplemental Off-Site Characterization Report* for the subject site. The enclosed report presents additional off-site soil data collected on the site in accordance with the *Work Plan Off-Site/Source Area Soils and Groundwater Sampling* prepared by Butler Services of Mississippi, Inc. and modified by CAC on November 20, 2001 and CAC's letter of April 7, 2003 concerning additional off-site soil sampling. The supplemental off-site soil investigation was approved by MDEQ on April 21, 2003. The Work Plan was implemented by CAC in April and May 2003.

We are presently completing a Corrective Action Plan, which will generally include:

- excavating off-site soils above regulatory limits,
- transporting the excavated soils to the site,
- spreading the excavated soil over the contaminated portion of the site,
- seeding the excavated soils to prevent soil erosion,
- installing silt and storm water control measures to prevent soils from being carried off-site,
- fencing the contaminated portion of the site to prevent unauthorized access, and
- establishing institutional controls for the site.

We are anticipating that the Corrective Action Plan will be submitted to MDEQ by August 25, 2003.

P.O. Box 177 • 300 Davis Avenue, Suite 100 • Pass Christian, Mississippi 39571 • Office: 228-452-4999 • FAX: 228-452-0117
www.covingtonassociates.net

As you review the enclosed report, please call me with any questions you may have. We appreciate your assistance on this project and look forward to your comments on the enclosed report.

Very truly yours,

John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank, w/enclosures

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

July 1, 2003

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

FILE COPY

RE: Gulfport Fertilizer Site
Fourth Groundwater Sampling Event Report dated April 23, 2003
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality has reviewed the above referenced report submitted by Covington and Associates Corporation on behalf of Hancock Bank and concurs with the reports findings. If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Penny H. Johnston

Penny Johnston, P.E.
Project Manager

DA Russell

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E. Covington & Associates

C:\Documents and Settings\PJohnston.OPC\My Documents\My Files\Gulfport Fertilizer\Gulfport Fertilizer 4th GW Sampling Report Concurrence Letter 6-13-03 (pj).doc

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

FILE COPY

MEMORANDUM

TO: Penny Johnston

FROM: **Jimmy Crellin**

DATE: June 30, 2003

SUBJECT: Gulfport Fertilizer site, groundwater sampling, GPS data

On June 12,2003 I traveled to the above referenced site to split a groundwater sample and to collect GPS location data.

Upon arrival at the site I drove approximately ¼ mile along the site access road to a point at which it appeared that the condition of the road deteriorated. From this point I took the GPS unit and proceeded on foot approximately 500 feet farther along the road to well location MW-7at which I activated the GPS unit and took a reading.

Several hundred feet farther along the site access road I met Lars Larson of Covington and Associates consultants, who had just completed collection of a groundwater sample at the MW-4 location. Having determined that the access road was passable by vehicle, I returned to the vehicle, drove to the front entrance to the property and collected GPS information at that point.

I returned to the location at which Mr. Larson was parked where he and I assembled sampling equipment for use at the MW-3 location. We hiked in to the MW-3 location, where Mr. Larson purged the well using a peristaltic pump, taking water quality parameters approximately every five minutes. Purge water was stored in 5-gallon buckets. When parameters stabilized, groundwater samples were collected in 250 mL and 125 mL HDPE bottles provided by Mr. Larson for metals and pH analysis respectively. After collecting sample splits and a duplicate alternately, we carried purge water, samples and equipment back to the parking area. Samples were stored on ice. At this time I reactivated the GPS unit and collected location data at nearby MW-1 before leaving the site.

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

May 6, 2003

FILE COPY

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

Re: Gulfport Fertilizer Site
Supplemental Site Characterization Report dated November 8, 2002,
Response to MDEQ's February 4, 2003 Letter dated April 7, 2003,
and *Analytical Report – OS-19, 6'-8', Appendix D, Response to MDEQ's February 4, 2003 Letter* dated April 11, 2003
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document submitted by Covington and Associates Corporation on behalf of Hancock Bank and concurs with the reports findings with the inclusion of the above referenced response and analytical sheet. If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Penny A. Johnston
Penny Johnston, P.E.
Project Manager

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E. Covington & Associates

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Covington & Associates Corporation
Environmental Engineers and Consultants

FILE COPY

April 11, 2003

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

Re: Analytical Report – OS-19, 6'-8', Appendix D
Response to MDEQ Letter dated February 4, 2003
***Supplemental Site Characterization Report* dated November 8, 2002**
Gulfport Fertilizer Site
Gulfport, Mississippi

Dear Penny:

As promised in our Response Letter of April 7, 2003, Covington and Associates Corporation (CAC) is enclosing three (3) copies of the analytical report for OS-19, 6'-8'. This analytical report should be included in Appendix D of the *Supplemental Site Characterization Report* for the subject site dated November 8, 2002.

Thank you for your attention to this matter.

Very truly yours,
COVINGTON AND ASSOCIATES CORPORATION

John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Ms. Joy Lambert Phillips, Hancock Bank

P.O. Box 177 • 300 Davis Avenue, Suite 100 • Pass Christian, Mississippi 39571 • Office: 228-452-4999 • FAX: 228-452-0117
www.covingtonassociates.net

ENVIRONMENTAL
SCIENCE CORP.

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Mr.John Szabo
Covington & Associates
P.O. Box 681821
Franklin, TN 37064

April 07,2003

ESC Sample # : L80847-04

Date Received : June 10, 2002
Description : Testing for Gulfport Fertilizer Area 1 Soil

Site ID :

Sample ID : OS-19 6-8FT

Project # : 9397

Collected By : John Szabo
Collection Date : 06/06/02 10:45

Parameter	W.Result	RDL	D.Result	RDL	Units	Method	Date
pH	4.5		4.5		su	9045C	06/19/02
Total Solids	84.0		84.0		%	2540G	06/25/02
Arsenic	1.8	0.50	2.2	0.59	mg/kg	6010B	06/21/02
Lead	2.8	0.25	3.3	0.30	mg/kg	6010B	06/21/02

FILE COPY

Allen Dunkerley, ESC Representative

BDL - Below Detection Limit
RDL - Detection Limit- Estimated Quantitation Limit(EQL)

Laboratory Certification Numbers:
A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233

Note:
The reported analytical results relate only to the sample submitted.

Reported: 06/25/02 16:21 Printed: 04/07/03 13:56

Covington & Associates Corporation
Environmental Engineers and Consultants

FILE COPY

April 7, 2003

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

Re: Response to MDEQ Letter dated February 4, 2003
***Supplemental Site Characterization Report* dated November 8, 2002**
Gulfport Fertilizer Site
Gulfport, Mississippi

Dear Penny:

Hancock Bank and Covington and Associates Corporation (CAC) are in receipt of the subject letter. This letter has been reviewed and the following responses are given.

1. The hazardous total lead concentration proposed (3,800 mg/kg) would apply to both surface and sub-surface soils.
2. Boring location PCN1 was not logged because this location was used to obtain a groundwater sample, only. Boring 30N25 was advanced and logged at this location by Butler Services in October 1998, so we felt that it was unnecessary to duplicate the sub-surface information.
3. I discussed the *Regulations for Control of Radiation in Mississippi* with Mr. Bob Goff with the Mississippi Department of Health. The regulations refer to "Radium-226 (RA-226) or Radium-228 (RA-228)" when determining whether Naturally Occurring Radioactive Material (NORM) exceeds regulatory limits (5pCi/gm for 0'-6" below ground surface or 15 pCi/gm for 6"-12" below ground surface). Mr. Goff confirmed that the regulations apply to the concentration of the individual constituent (either Ra-226 or Ra-228) and not a total concentration of both constituents (Ra-226 and Ra-228). Therefore, it is concluded that the locations of NORM contamination exceeding the regulatory limits is as shown in the *Supplemental Site Characterization Report* (the report).
4. The horizontal and vertical extent of the NORM contamination on the site will be determined while implementing the corrective action activities at the site, if necessary to implement the Corrective Action Plan. The Corrective Action Plan to be submitted by April 30, 2003.
5. "Blind" duplicate samples will be collected during all future sampling events.
6. Soil samples will be placed in an ice chest on ice for preservation during all future

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www.covingtonassociates.net

sampling events.

7. Table 2 has been revised to show the analytical results for RC10.1, 20'-24' instead of for P1N19, 20'-24'. We are attaching three (3) copies of the revised Table 2. Please substitute for the Table 2 in the report.
8. Table 5 has been revised to show the duplicate analytical results for SS-1, 1'-2' instead of for SS-4, 1'-2'. We are attaching three (3) copies of the revised Table 5. Please substitute for the Table 5 in the report.
9. The analytical laboratory has been contacted requesting a copy of the analytical report for OS-19, 6'-8'. Once received, we will forward to you so it can be included in Appendix D.
10. Attached are three (3) copies of the analytical report for NORM-5, 15'E, 0"-6". These values are reflected on Table 9 of the *Supplemental Site Characterization Report*. Please include this analytical report in Appendix L.

By separate letter, we are submitting a work plan to delineate the horizontal and vertical extent of the off-site contamination. Additionally, we will be discussing corrective action plan options with Hancock Bank so that a corrective action plan can be submitted to MDEQ as soon as possible.

We appreciate your review of the report. If you have any questions concerning the information contained in this letter, please contact us.

Very truly yours,
COVINGTON AND ASSOCIATES CORPORATION

John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Ms. Joy Lambert Phillips, Hancock Bank

FILE COPY

Table 2
Summary of Analysis
Soil Samples
Former Gulfport Fertilizer Site
Gulfport, MS

Client: Hancock Bank

Sample Location	Arsenic (mg/kg) Soil Sample Interval (ft.)									Lead (mg/kg) Soil Sample Interval (ft.)					
	0'-2'	TCLP, 0'-2'	2'-4'	4'-6'	6'-8'	8'-12'	12'-16'	16'-20'	> 20'	0'-2'	TCLP, 0'-2'	2'-4'	4'-6'	6'-8'	> 8'
P1N23	0.85		N.A.	1.1						39		N.A.			
PN30.1	2.8		2.4							41		1.9			
31N29.1	1.7		1.6							6.2		3.2			
P1N20	170/230		700	230/190	4.6					400/270		28			
31N19.1	69		62	26	6.1	6.4				300		9.3			
P1N21	65		1.0							720		3.9			
N18.1	3.2/2.9		0.86							27/20		26			
P1N18	1.3		<0.62							17		4.5			
P1N19	9.5		66	46	9.6	16	7.0	1.7		37		19			
RC10.1	140		21	50	23	5.4	2.9		11 (20'-24')	680		9.1			3.8 (20'-24')
RC9.1	29		75/34	9.9	3.2					930		30/15			
P1RC18	32		23	33	1.8	1.8				790		160			
RC7.1	43		5.0							1400		36			
P1S14	43		24	2.4						220		230			
T450.1N	39		<0.58	1.2						600		4.1			
P1S15	12	<0.050	15	30	0.99					1700	85	39			
P1S16	85		2.3	1.4	2.2	1.4				7200		560	71		
T550.1N	120		160	190	55	15	1.6			5500		360			
T5.1	25		2.5							160		12			
P1S11	11/1.0		<0.60							1100/190		21			11 (24'-28')
S18.1	300	<0.050	38/58	41	6.8	4.3			12 (24'-28')	3100	3.4	8.0/7.3			
P1S12	47	<0.050	5.0							5800	35	16			
P1S13	27		7.7	9.6	<0.64					1300		100			
S16.1	50		100	63	8.3	41	0.87			35		8.9			
31S15.1	22		N.A.	57	6.7					160		N.A.	31		
P1S17	35		20	0.81						100		12			
P1S8	110	<0.050	1.5	3.7	3.3	7.7				20000	62	450	420	21	
T450.1E	31		1.2	1.2						1700		23			
T4100.1E	110/130		8.3	20	3.2	2.5				790/780		31			
P1S9	200		80	9.1	43	7.0				1800		46			
P1S10	27		120	67	0.63					580		60			
S40.1	1.4		4.1							27		5.4			
P1S6	110		56	80	4.4	1.4				3800		110			
P1S7	17		3.7							570		18			
S50.1	590		94	48	2.2	<0.62				2000		13			
P1S3	3.7		2.5							49		3.2			
P1S4	3.2		1.7/1.2							1200		330/94			
S45.1	4.4		5.0							6.5		3.3			

Note: Shaded results exceed background level of 7.18 mg/kg for arsenic, 400 mg/kg for lead or 5.0 mg/l for TCLP arsenic and TCLP lead.
N.A. - Not Analyzed

Table 5
Summary of Analysis
Stream Sediment Samples
Former Gulfport Fertilizer Site
Gulfport, MS

Client: Hancock Bank

Sample Location	Arsenic (mg/kg)		Lead (mg/kg)	
	Soil Sample Interval (ft.)		Soil Sample Interval (ft.)	
	0'-1'	1'-2'	0'-1'	1'-2'
SS-1	2.3	6.8/4.2	17	68/48
SS-2	1.6	3.8	29	23
SS-3	5.0	1.3	53	7.5
SS-4	2.3	0.69	11	2.2

ARS
AMERICAN RADIATION SERVICES, INC.

1726 Wooddale Court • Baton Rouge, Louisiana 70806
1 (800) 401-4277 • Fax (225) 927-6822

ARS Tracking Number:	ARS-01-0642	**P.O. Number:**	N/A
Client I.D.:	NORM 5, 15'E, 0-6	**ARS Sample I.D.:**	ARS-01-3136
Date Sampled:	05/02/01	**Date Received:**	5/4/01
Time Sampled:	0205	**Time Received:**	1430
Type of Sample:	Solid	**Date of Report:**	5/10/01

Analysis Description	Analysis Result	Analysis Error +2 Sigma	Analysis Units	Analysis Result	Analysis Error +2 Sigma	Analysis Units	Analysis Test Method	Analysis Date & Time	Analysis Technician
Ra-226	11.28	0.88	pCi/gm	0.417	0.033	Bq/gm	EPA 901.1M	05/10/01 08:21	rb
Ra-228	0.60	0.09	pCi/gm	0.022	0.003	Bq/gm	EPA 901.1M	05/10/01 08:21	rb
Pb-210	6.13	0.74	pCi/gm	0.227	0.027	Bq/gm	EPA 901.1M	05/10/01 08:21	rb
Total Activity	41.17	N/A	pCi/gm	1.523	N/A	Bq/gm	EPA 901.1M	05/10/01 08:21	rb

Notes: Gulfport Fertilizer

Quality Assurance Review

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

April 21, 2003

FILE COPY

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

RE: Gulfport Fertilizer Site
Additional Soil Borings - Off-Site Area Work Plan dated April 7, 2003
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality has reviewed the above referenced work plan submitted by Covington and Associates Corporation on behalf of Hancock Bank. The work plan is approved as submitted. If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Penny A. Johnston

Penny Johnston, P.E.
Project Manager

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E. Covington & Associates

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

February 18, 2003

FILE COPY

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

RE: Gulfport Fertilizer Site
Third Groundwater Sampling Event Report dated December 28, 2002
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality has reviewed the above referenced report submitted by Covington and Associates Corporation on behalf of Hancock Bank. The report is approved as submitted. Based on the information provided in the referenced report, MDEQ has one requirement for future sampling events.

1. The conductivity readings during purging shall vary no more than three percent (3%) for three consecutive readings prior to sample collection. While the above referenced report states that conductivity shall vary no more than 10%, the actual readings did not vary more than 3%.

If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Penny A. Johnston

Penny Johnston, P.E.
Project Manager

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E. Covington & Associates

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Covington & Associates Corporation
Environmental Engineers and Consultants

April 7, 2003

Ms. Penny Johnston
Mississippi Department of Environmental Quality
Uncontrolled Sites Branch
P.O. Box 10385
Jackson, Mississippi 39289-0385

Re: Additional Soil Borings – Off-Site Area
Former Gulfport Fertilizer Plant Site
33rd Street
Gulfport, Mississippi
CAC Project No. 9379

Dear Penny:

In accordance with MDEQ's review letter of February 4, 2003, Covington and Associates Corporation (CAC) is proposing to conduct a limited off-site soil investigation at the former Gulfport Fertilizer site to determine the horizontal and vertical extent of the off-site contamination. This investigation will be conducted in accordance with the criteria and protocols established in the original *Site Characterization Work Plan* (Work Plan) and the site's *Health and Safety Plan* prepared by Butler Services of Mississippi and revised by CAC. The proposed off-site soil investigation is being conducted in order to delineate the extent of lead and arsenic concentrations in the soil based on the analytical data that was previously presented in the November 8, 2002 *Supplemental Site Characterization Report*.

CAC proposes to advance up to seventeen (17) soil borings, as site conditions allow, on the off-site property located along the western and northwestern periphery of the area of investigation. These borings are designated as OS-24 through OS-40, and are illustrated on the attached site maps. Figure 1 shows the proposed boring locations versus the horizontal limits of arsenic contamination previously established. Figure 2 shows the proposed boring locations versus the horizontal limits of lead contamination previously established.

As you may recall, the adjacent property where these additional borings will be advanced is covered in dense vegetation and undergrowth. Accordingly, this scope of work is designed to allow the field sampling personnel the flexibility to alter or reduce the number of sample borings or total boring depths as conditions allow, while gathering a representative number of soil samples necessary to complete the horizontal and vertical delineation of the off-site contamination. Our goal is to advance as many soil borings and collect as many soil samples as possible during one (1) day of sampling on the site.

All of these borings will be located on the adjacent property along the west and northwest periphery of the area of investigation where lead and arsenic concentrations require delineation as shown on Figures 1 and 2. These borings will be advanced on approximately 50' centers along the designated sample transects. Two new sample transects will be established

approximately 100' and 200' north of the north-most existing sample transect as shown on Figures 1 and 2. Continuous soil sampling will be conducted every 2' to a maximum depth of 10' BGS (below ground surface). A field geologist will log each boring and will classify the soils from each sample interval. A representative sample from each of the 2' intervals will then be collected and placed into the requisite sample containers, labeled and placed in a cooler with ice. "Blind" soil samples will be collected for 10% of the soil sample intervals sampled. The sample collection protocols presented in the Work Plan will be followed. Sample analysis will include total arsenic and total lead by Method 6010 (B). Sample analysis will be conducted in a tiered manner (i.e. initially 0'–2' and 2'-4' intervals for boring locations OS-24, OS-27, OS-28, OS-31, OS-33, OS-36 and OS-37). If these sample intervals report arsenic or lead concentrations above the designated action levels, then the next deeper interval intervals will be analyzed along with the 0'-2' and 2'-4' interval of the adjacent boring locations. This procedure will continue until the horizontal and vertical limits of arsenic and lead concentrations have been defined. No groundwater samples will be collected during this investigation. At the conclusion of the sampling activities, all of the boreholes will be backfilled with cement/bentonite slurry in accordance with standard practices and procedure for borehole abandonment. A letter report presenting the analytical data and conclusions from the soil investigation will be prepared and submitted to MDEQ.

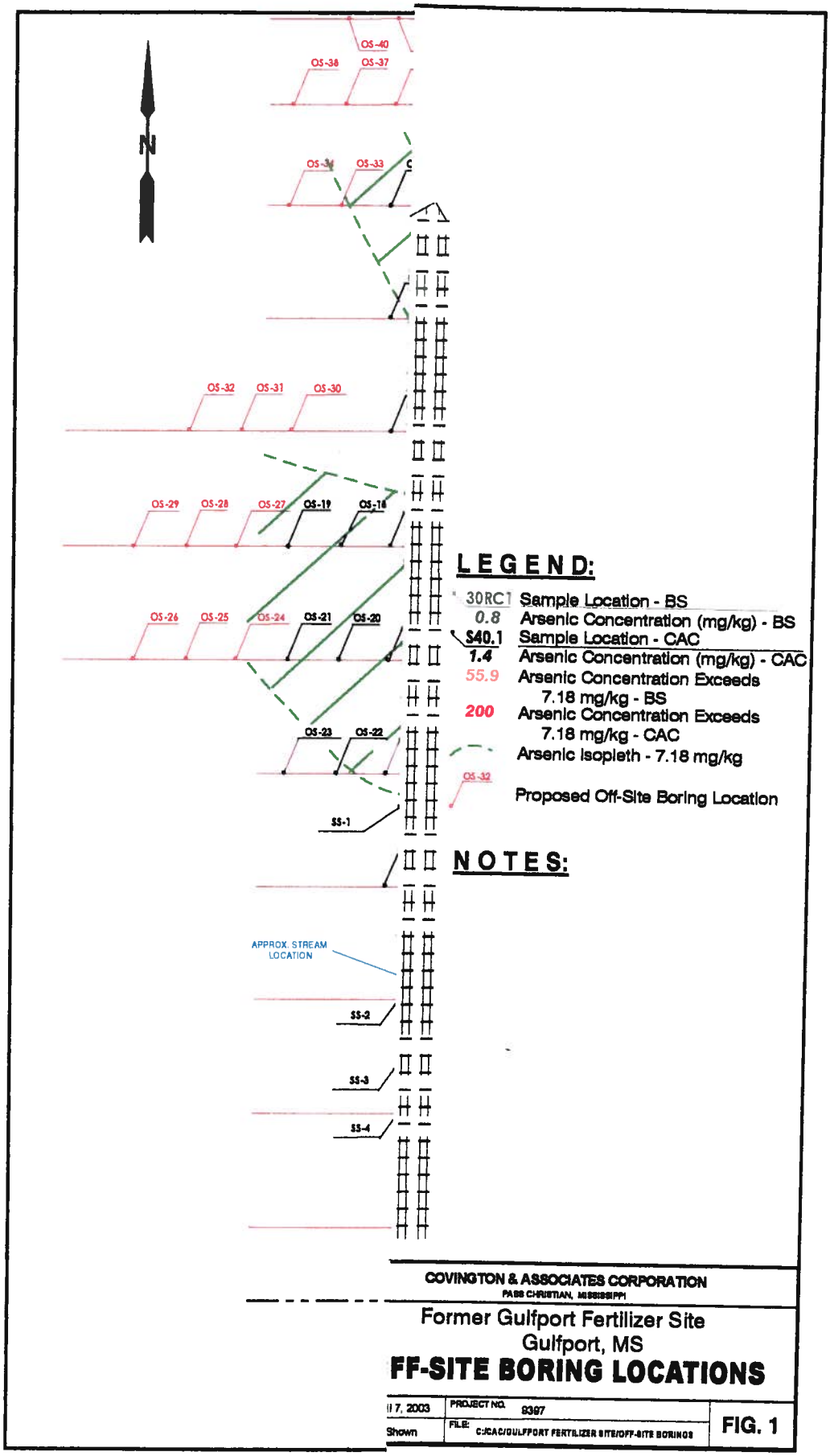
If you have any questions concerning this proposed soil investigation, please contact us. If the proposed boring locations meet with your approval, please send us your approval of this approach as we would like to mobilize on April 15 or 16, 2003. We appreciate your input and help on this project and look forward to hearing from you.

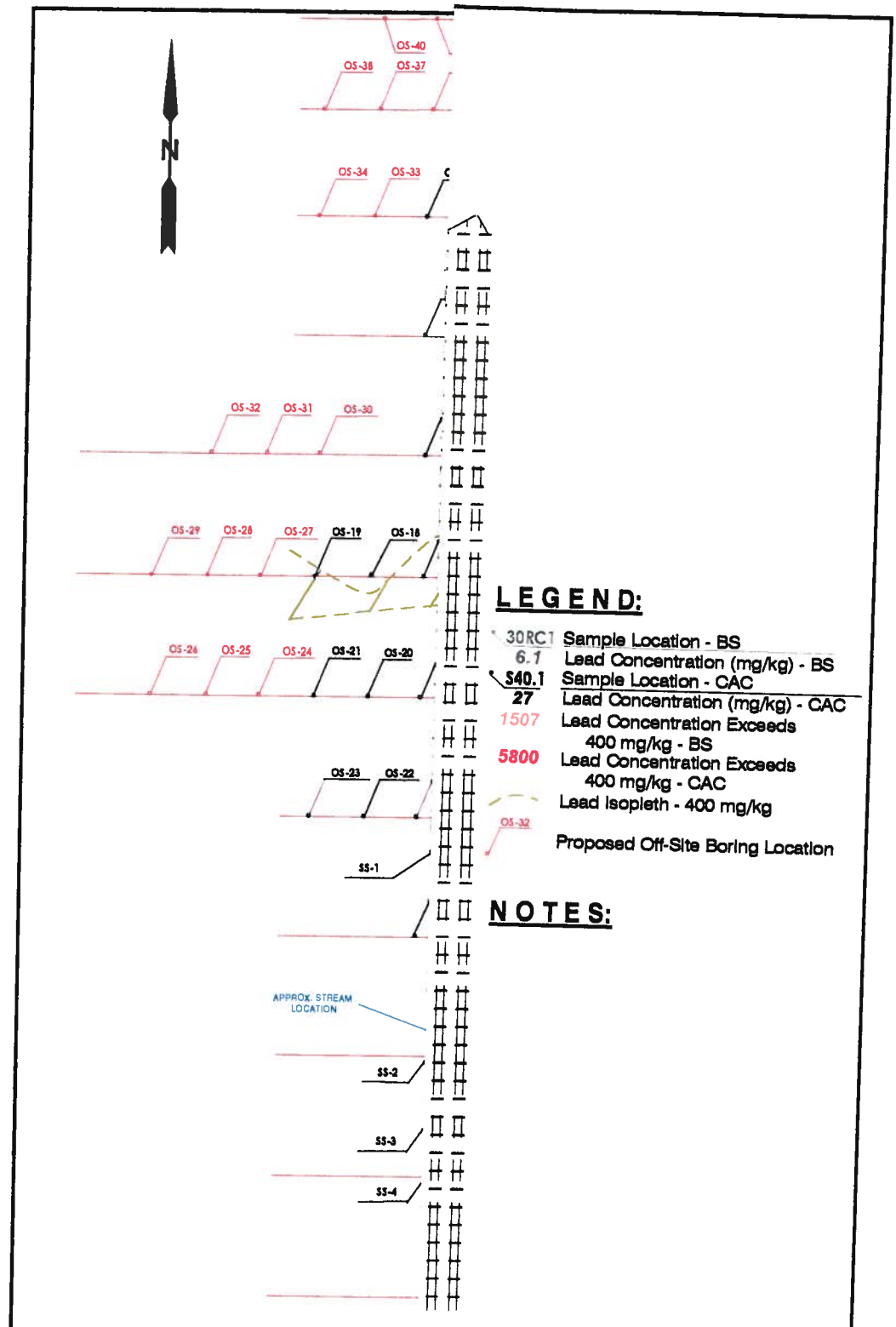
Very truly yours,

John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank/Enclosures


N
OS-40
OS-38
OS-37
OS-34
OS-33
OS-32
OS-31
OS-30
OS-29
OS-28
OS-27
OS-19
OS-18
OS-26
OS-25
OS-24
OS-21
OS-20
OS-23
OS-22
SS-1
APPROX. STREAM LOCATION
SS-2
SS-3
SS-4
LEGEND:
30RC1 Sample Location - BS
0.8 Arsenic Concentration (mg/kg) - BS
S40.1 Sample Location - CAC
1.4 Arsenic Concentration (mg/kg) - CAC
55.9 Arsenic Concentration Exceeds 7.18 mg/kg - BS
200 Arsenic Concentration Exceeds 7.18 mg/kg - CAC
Arsenic Isopleth - 7.18 mg/kg
OS-32 Proposed Off-Site Boring Location
NOTES:
COVINGTON & ASSOCIATES CORPORATION
PASS CHRISTIAN, MISSISSIPPI
Former Gulfport Fertilizer Site
Gulfport, MS
FF-SITE BORING LOCATIONS
PROJECT NO. 9397
FILE: C:/CAC/GULFPORT FERTILIZER SITE/OFF-SITE BORINGS
FIG. 1



COVINGTON & ASSOCIATES CORPORATION
PASS CHRISTIAN, MISSISSIPPI

Former Gulfport Fertilizer Site
Gulfport, MS

FF-SITE BORING LOCATIONS

il 7, 2003	PROJECT NO. 6367	FIG. 2
Shown	FILE: C:/CAC/GULFPORT FERTILIZER SITE/OFF-SITE BORINGS	

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

February 4, 2003

FILE COPY

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

Re: Gulfport Fertilizer Site
Supplemental Site Characterization Report dated November 8, 2002
Gulfport, Mississippi

Dear Ms. Phillips:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document submitted by Covington and Associates Corporation on behalf of Hancock Bank. The review of this document has generated the following comments/requirements:

1. Sections 1.0 and 4.1.3 state that sub-surface soils exceeding 3,800 milligrams per kilogram (mg/kg) total lead concentration will be considered hazardous for lead. What action level for hazardous total lead concentration are you proposing for surface soils?

2. Section 3.3 states that boring location PCN1 was neither logged not sampled, but does not state why. This information shall be provided.

3. Section 5.0 states that the *Regulations for Control of Radiation in Mississippi* prohibit the transfer of property having radioactive levels greater than 5 pico-curies per gram (pCi/gm) for soils zero to six inches below ground surface (0"-6" BGS) and 15 pCi/gm for soils 6"-12" BGS for unrestricted (residential) uses. Is this regulation for the total concentration of Radium-226 (Ra-226) and Radium-228 (Ra-228) or for the concentration of the individual constituents? If the regulation is for total concentration then Table 9 shall be revised to include sample locations NORM-1 and NORM-5, 10'W in the highlighted portion of the table. Clarification regarding this regulation shall be provided. Table 9 shall be revised as appropriate.

4. Section 5.3 states that the horizontal and vertical extents of the areas of the site exceeding the NORM regulatory limits have been adequately defined. Based on the information presented in the report, the MDEQ does not agree with this statement. The MDEQ requires that the horizontal and vertical extents of the NORM contamination be defined. This task may be accomplished during corrective action activities at the site.

5. Duplicate samples shall be blind duplicates. For example a duplicate sample collected from boring location OS-19 2'-4' could be labeled OS-24 2'-4', but should not be labeled OS-19 2'-4'R. Blind duplicates shall be collected during all future sampling events. This requirement is in accordance with the United States Environmental Protection Agency Region IV's Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM) dated November 2001. A copy of this document is available at: http://www.deq.state.ms.us/newweb/hwhome.nsf/pages/HWDivision/$file/hw.htm.

6. Soil samples shall be placed in an ice chest on ice for preservation after collection of samples and during shipment of samples to the laboratory. The samples shall be maintained at four degrees Celsius (4°C). This requirement is in accordance with the EISOPQAM and shall be adhered to during all future sampling events.

7. Table 2 shows an analytical result for boring location P1N19 20'-24'. This analytical result is for sample RC10.1 20'-24'. The table shall be corrected.

8. Table 5 shows duplicate analytical results for boring location SS-4 1'-2'. The duplicate analytical results are for boring location SS-1 1'-2'. The table shall be corrected.

9. Appendix D does not contain the analytical sheet for sample location OS-19 6'-8'. The analytical sheet shall be submitted.

10. Appendix L does not contain the analytical sheet for sample location NORM-5, 15'E 0"-6". The analytical sheet shall be submitted.

A response to the above items, including all revised/missing pages and tables, shall be submitted to MDEQ by March 14, 2003, for review and approval. A work plan to delineate the horizontal and vertical extent of the off-site contamination shall be submitted to MDEQ for review and approval by March 28, 2003. A corrective action plan to address the NORM, hazardous, and non-hazardous contamination on- and off-site shall be submitted to MDEQ for review and approval by April 30, 2003. If you have any questions or comments, please contact Penny Johnston at (601) 961-5388.

Sincerely,

Penny Johnston, P.E.
Project Manager

Tony Russell, Chief
Uncontrolled Sites Branch

cc: John F. Szabo, P.E. Covington & Associates

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PERFORMANCE MONITORING REPORT

SECTION 7.0 CONTAMINATION ASSESSMENT PLAN

Former Gulfport Fertilizer Site
33rd Street
Gulfport, Mississippi

Presented on Behalf of:
Hancock Bank
2510 14th Street
Gulfport, MS 39501

February 2009

John F. Szabo, P.E./Project Manager

Prepared by:
COVINGTON CIVIL & ENVIRONMENTAL, LLC
Delivery Address: 14257 Dedeaux Road, Suite B
Gulfport, Mississippi 39503
(228) 396-0486
FAX: (228) 396-0487

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1.0 INTRODUCTION

This Performance Monitoring Report documents activities conducted at the former Gulfport Fertilizer Site in Gulfport, Mississippi. The field activities (soil excavation, soil stockpiling, treating, backfilling excavations and off-site disposal) were conducted in accordance with the *Interim Corrective Action Plan* (ICAP) approved by the Mississippi Department of Environmental Quality (MDEQ).

1.1 Identified Areas to be Excavated

There were five distinct areas identified during previous investigations with lead concentrations greater than 3,800 mg/kg. Analyses showed that lead concentrations in on-site soils greater than 3,800 mg/kg were considered *characteristically hazardous* (TCLP Lead > 5.0 mg/l) and thus required excavation, treatment (if necessary) and off-site disposal in a permitted landfill. The five (5) identified areas to be excavated were located on the original 33 acres of the former Gulfport Fertilizer property (Page 17, Appendix 7). The areas identified for excavation and sampling activities included Area #2, Area #3, Area #5, Area #8 and Area P1S8. Areas #2, #3, #5 and P1S8 were located just north of the concrete slab in the center of the original Gulfport Fertilizer property. Area #8 was located adjacent to and west of the concrete slab.

2.0 SITE ACTIVITIES

The field activities described in this report followed the procedures outlined in Section 7.0 - Performance Monitoring Plan contained in the approved ICAP.

2.1 Utility Clearance Prior to Excavation Activities

The areas identified during previous investigations were in areas of the site where no known utilities were located, based on previous soil sampling activities. As a precaution, Mississippi One Call was contacted prior to implementing any on-site excavation or soil handling activities as prescribed in the *Interim Corrective Action Plan.* The various utility providers (telephone, cable TV, city utilities, etc.) confirmed that no utilities were present in the proposed work areas.

2.2 Air Sampling During Initial Excavation and Soil Handling Activities

Area air monitoring (both upwind and downwind of excavation activities) was performed during initial excavation of Areas #5 and #8 to fulfill requirements contained in the Health and Safety Plan of the ICAP. In addition, personnel air monitoring equipment was worn by the backhoe operator (the worker potentially most exposed to contaminated dust from the excavation activities). The OSHA action levels in air to require worker protection levels is 5 $\mu g/m^3$ for Arsenic (As) and 30 $\mu g/m^3$ for Lead (Pb) on a time-weighted average. The analytical results for both area and personnel air sampling of the

two above mentioned excavation areas were below the action levels requiring worker respiratory protection. The area air monitoring and personnel air monitoring analytical results are included in the summary analytical sheet contained in Appendix B.2. The actual analytical data sheets and chain of custody sheets are included in Appendices D and F, respectively. Level D personnel protection was deemed appropriate for site workers based on the results from the air monitoring (personnel and area).

2.3 Dust Control Measures

Dust control measures were not necessary during excavation and soil handling activities due to low dust levels being produced. No significant visible dust was noted during excavation and/or soil handling activities. It had rained before field implementation and sporadically throughout the field activities (e.g. thunder showers) which kept the fugitive dust emissions to a minimum.

2.4 Site Preparation

The ground surface of the identified areas primarily contained grass and minor shrub vegetation. Little site preparation was required (e.g. minor soil scraping with excavator), except for re-establishing the limits of excavation as established during previous investigations. The identified areas approximate limits of lateral excavations were marked by field staking and flagging utilizing data from previous investigations. All surface vegetation removed from the identified areas to be excavated was placed in the

prepared soil stockpile storage area. The soil stockpile storage area was the staging area where excavated soils were temporarily stored awaiting analytical characterization prior to off-site disposal or on-site treatment. The five identified areas were prepared before initiating excavation activities. Temporary storm water control measures were implemented to prevent storm water from entering/exiting the identified areas. These storm water measures included soil berming/diversion ditches and silt fencing. Refer to representative site photographs included in Appendix C.

2.5 Soil Stockpile Storage Area

A bermed soil stockpile storage area was prepared before excavation of the identified areas. The soil stockpile storage area was located in the southeastern portion of the property. The location was selected, because it was considered topographically high ground and was located near the entry gate to facilitate truck loading and off-site transport to the landfill. The useable area of the soil stockpile storage area measured approximately 80' by 100' to accommodate the anticipated soil volume (e.g. 1,000 yds^3) to be excavated from the identified areas. Diversion ditches and soil berms were constructed for stormwater management as presented in the ICAP. The surrounding diversion ditches were approximately 12" deep and 2'-3' wide. The soil berms were placed inside the diversion ditches and were also used to secure the plastic sheeting laid on the ground, which served as the surface on which excavated material was stored. The useable area of the soil stockpile area was overlaid with two (2) layers of 6-mil polyethylene sheeting. Each layer of plastic sheeting was overlapped approximately 2'

with the previous plastic sheet and secured with spray adhesive. The native surface soil within the soil stockpile area was sampled and analyzed before laying down the plastic sheeting and before any soil stockpiles were placed. The area was also sampled after demobilization of the soil stockpile area. The surface soil samples were composite samples and were analyzed for total TCLP arsenic and lead. There was no impact to native soil in the soil stockpile area based on comparison of before and after surface soil analytical data. Refer to site photographs in Appendix C. The analytical report sheets and chain of custody sheets for the soil stockpile and treatment areas are included in Appendix D and F, respectively.

2.6 Treatment Area and Treated Soil Stockpile Storage Area

A treatment area and treated soil stockpile storage area was prepared after characterization samples showed that seven (7) stockpiles of excavated material within the soil stockpile area required on-site treatment. The treatment area and treated soil stockpile storage area was located in the southeastern portion of the property, just north of the original excavated soil stockpile area. This location, as the original excavated soil stockpile area, was selected because it was considered topographically high ground and was located near the entry gate to facilitate truck loading and off-site transport to the landfill. The useable area of the soil stockpile storage area measured approximately 100' by 120' to accommodate a mixing container (a 20 yds^3 roll-off container). The stormwater controls (diversion ditches and soil berms) were identical to those provided around the original soil stockpile area. Plastic sheeting was also used in the same manner

as the original soil stockpile area. Sampling of native soil under the plastic sheeting was conducted before and after the area was utilized. There was no impact to native soil in the treatment and treated soil stockpile area based on comparison of before and after surface soil analytical data. Refer to site photographs in Appendix C. The analytical report sheets and chain of custody sheets for the treated soil stockpile and treatment areas are included in Appendix D and F, respectively.

2.7 Naturally Occurring Radioactive Material (NORM) Areas

In order to prevent/limit access to the portion of the site where Naturally Occurring Radioactive Material (NORM) is present, a 6' security fencing with warning signs has been installed following guidance contained in ICAP. Two NORM contaminated areas have been previously identified on the original 33 acres. Although the NORM contamination at this site is not regulated by the Mississippi State Department of Health (MSDH), Hancock Bank has taken measures to identify the NORM areas to warn site personnel and contractors not to enter these areas. Signs have been placed on the fence warning persons about the presence of NORM contamination and telling site personnel and contractors to keep out. It is anticipated that the two NORM areas will be covered by the proposed 10" clay cap. The fencing around the two NORM areas will be removed as the clay cap is being installed. The two NORM areas will be surveyed so they can be shown on proposed future Use Restriction Document.

3.0 EXCAVATION AND SOIL HANDLING ACTIVITIES

3.1 Excavation and Clearance Soil Sampling of Identified Areas

Excavation of the five identified areas began at the furthest limit of anticipated excavation and proceeded toward the center of the identified areas. The excavated soils were transported to the excavated soil stockpile area for characterization. Excavation of the identified areas continued until all soils containing lead suspected to be above 3,800 mg/kg of lead within the "limits of excavation" were removed.

The identified areas to be excavated had the following surface area measurements after staking and flagging: Area #2- 21' x 130'; Area #3- 13' x 100'; Area #5- 26' x 49'; Area P1S8- 15' x 15'; and Area #8- 20' x 47'.

Once the initial "limits of excavation" of the identified areas had been excavated, clearance soil samples were collected from the bottom and sidewalls of the excavated areas. These samples were analyzed for concentrations of total lead to determine if the remaining unexcavated soils were above or below 3,800 mg/kg for total lead. One composite soil sample was collected from every 1,000 square feet of area in the bottom of the excavation and one composite soil sample was collected for every 100 linear feet of sidewall excavation. Each composite sample for clearance consisted of soils collected from eight (8) to ten (10) discrete locations within the excavated area. Each clearance

soil sample was collected within 2 inches of the unexcavated soil surface. The clearance soil samples collected from the eight (8) to ten (10) sampling locations within a sampling area were mixed into a composite sample in accordance with EPA's "Quarters Method" of mixing. All identified areas passed the 3,800 mg/kg total lead criteria with the first excavation pass, except for the middle portion of Area 2. The middle portion of Area 2 required a second 18" excavation to reach sub-surface soil below the 3,800 mg/kg limit for total lead. Analytical summary tables are included in Appendix B. The actual analytical report sheets and chain of custody sheets are included in Appendix D and F, respectively. Refer to site photographs included in Appendix C.

3.2 Soil Handling and Characterization Sampling of Stockpiled Soils (Untreated) and Treated Soil Piles

The excavated soils were placed within the prepared soil stockpile area in 100 cubic yard stockpiles. All excavated soils were placed in the original soil stockpile storage area in the southeastern corner of the site.

Characterization sampling and analysis for disposal was performed on stockpiled (untreated) and treated soil stockpiles. Each characterization sample from the stockpiled excavated soil consisted of ten (10) discrete grab samples collected from each soil stockpile. The discrete samples were placed in a properly decontaminated mixing bowl and then thoroughly mixed using EPA's "Quarter Method" to form one representative composite sample of each soil stockpile. The composite soil samples were placed into

appropriate sample containers. The containers label were marked with all of the necessary information regarding the sample, as prescribed in SW-846, Test Methods for Evaluating Solid Waste, Physical/Chemical Test Methods, 3rd Edition (USEPA 1986). Collection of a sample initiated the Chain-of-Custody process. The completed chain-of-custody form will include information regarding the sample type, sampling location, date and time of collection, type of container, and the name of the sampling personnel. All samples collected and labeled were then transferred to a cooler, with ice to maintain 4° C. The samples were shipped via Federal Express for next morning delivery to Environmental Science Corporation (ESC) in Mt. Juliet, Tennessee, for Total Characteristic Leaching Procedure (TCLP) analysis of the sample for lead.

CEC used Environmental Science Corporation (ESC) in Mt. Juliet, Tennessee for analyses during the implementation of the soil excavation, treatment activities and disposal as in previous investigation activities to maintain consistency throughout the overall project.

3.2.1 Analytical Results of Characterization Sampling

Analytical results for characterization samples of the excavated soils in the soil stockpile area revealed that seven (7) of the ten (10) total soil stockpiles exceeded TCLP regulatory limits for either arsenic or lead. The seven (7) soil stockpiles were treated on-site following a MDEQ approved Waste Analysis Plan (WAP). The WAP is included in Appendix G. The seven (7) soil stockpiles requiring treatment were mixed with Enviro-

Blend, a priorteriary additive shown to make many heavy metals (lead and/or arsenic) non-leachable from soil, so the soils can be classified as non-hazardous waste. Additional information on the soil additive utilized and procedures followed is included the WAP in Appendix G.

The characterization samples of the soil stockpiles revealed that three (3) soil stockpiles were shown to be non-hazardous and did not require treatment. These stockpiles were covered with plastic and marked as not needing treatment. The three (3) soil stockpiles were temporarily stored until the seven (7) soil stockpiles requiring treatment could be treated, characterized and readied for off-site disposal. Summary of characterization sample results for the untreated soil stockpiles (three piles) and the treated soils (seven piles) are included in Appendix B. The analytical report sheets and chain of custody sheets are included in Appendix D and F, respectively. Refer to site photographs included in Appendix C.

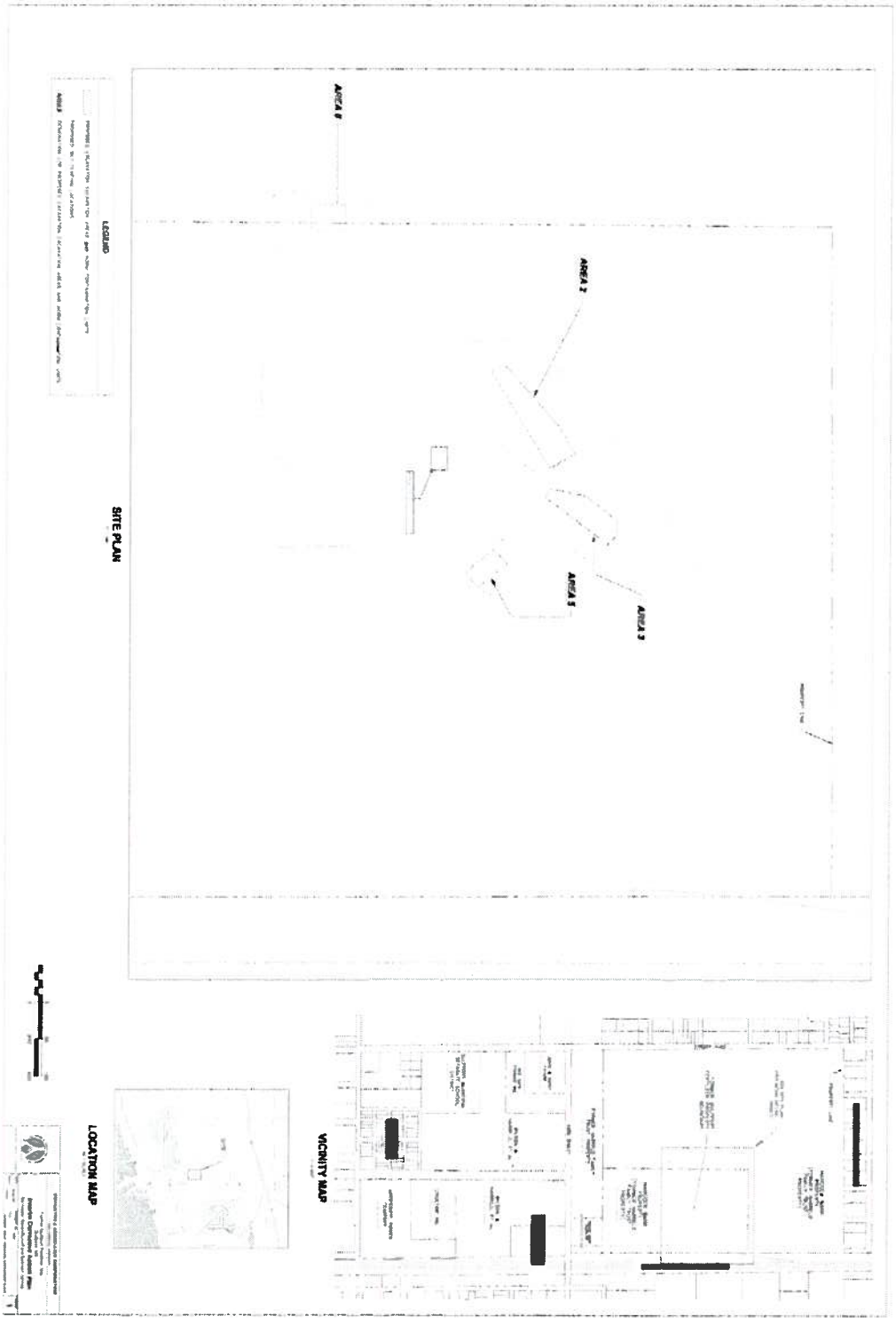
3.3 Backfill of Excavated Areas

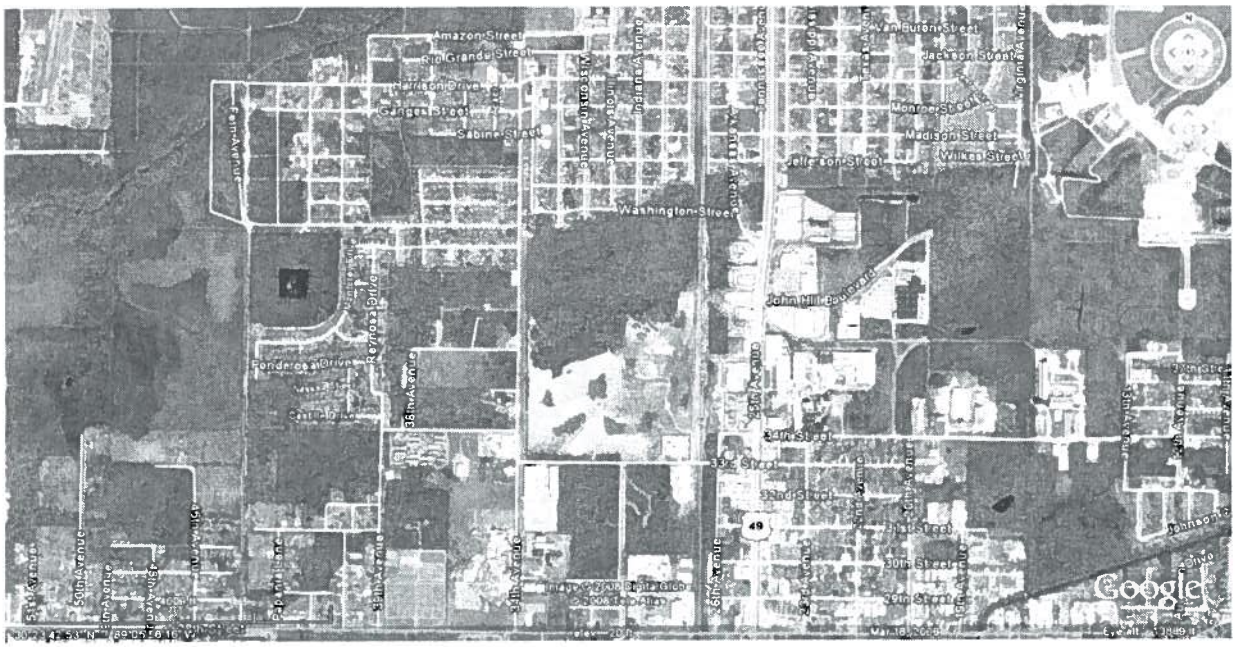
The previously identified excavated areas were backfilled with clean, off-site soils. The backfill was placed in twelve-inch (12") layers in the excavated areas and were compacted with the hydraulic excavator to an approximate density of adjacent, unexcavated soil. The excavated areas were also graded to prevent ponding of rainwater and to promote natural drainage. The backfill soil was sampled and analyzed for total lead and arsenic before placement in the identified excavation areas. The analytical

results showed the off-site backfill to be clean (below 3,800 mg/kg of total lead). Analytical report sheets and chain of custody sheets for the backfill soil are included in Appendix D and F, respectively.

4.0 SUMMARY

The site activities conducted at the former Gulfport Fertilizer property followed the requirements presented in Section 7.0 (Performance Monitoring Plan) of the MDEQ approved ICAP. A total of five (5) areas were identified as requiring excavation and disposal of lead containing soils. Approximately 1,100 yds^3 of soil was excavated from the five identified areas and temporarily placed in a constructed soil stockpile area. A majority of the five identified areas only required one excavation pass (approximately 18" to 24" deep) to pass clearance sampling. One area, Area # 2, required a second excavation pass (an additional 18" depth) to meet clearance requirements. The excavated soils were stockpiled in approximately 100 yds^3 piles in the soil stockpile area. A total of ten (10) soil stockpiles were contained within the soil stockpile area. Characterization sampling and analyses were conducted on the ten (10) soil stockpiles. Three (3) soil stockpiles were non-hazardous for TCLP lead (<5.0 mg/L) and seven (7) soil stockpiles were characteristically hazardous for TCLP lead (>5.0 mg/L). The seven (7) soil stockpiles required treatment with soil amendments to render the soil non-hazardous to regulatory testing criteria (TCLP analysis). A Waste Analysis Plan was developed to outline treatment procedures (soil handling, mixing, etc.) and to select the best soil amendment (fixation) additive for the site soils. Each truck load of excavated soils disposed at the off-site landfill has a corresponding manifest tracking the load from the soil stockpile, to the truck load and to the landfill. Pecan Grove, a Waste Management landfill was the soil receiving facility for the excavated soils from the former Gulfport Fertilizer site.


AREA 4
AREA 2
AREA 3
AREA 1
LEGEND
SITE PLAN
LOCATION MAP
VICINITY MAP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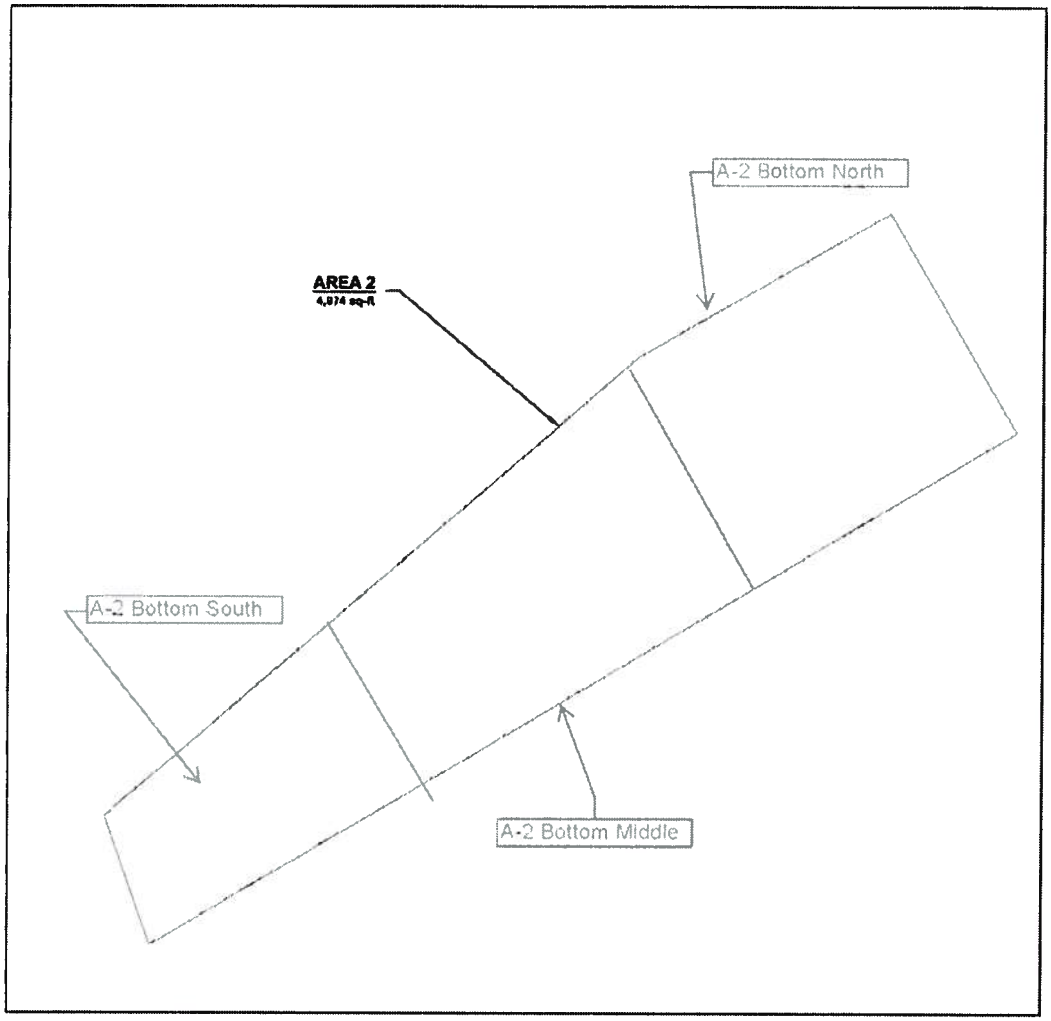
Harrison Drive
Ganges Street
Sabine Street
Washington Street
Van Buren Street
Jackson Street
Monroe Street
Madison Street
Jefferson Street
Wilkes Street
John Hill Expressway
Fondren Drive
Reno Drive
38th Avenue
34th Street
33rd Street
30th Street
29th Street
49
Google

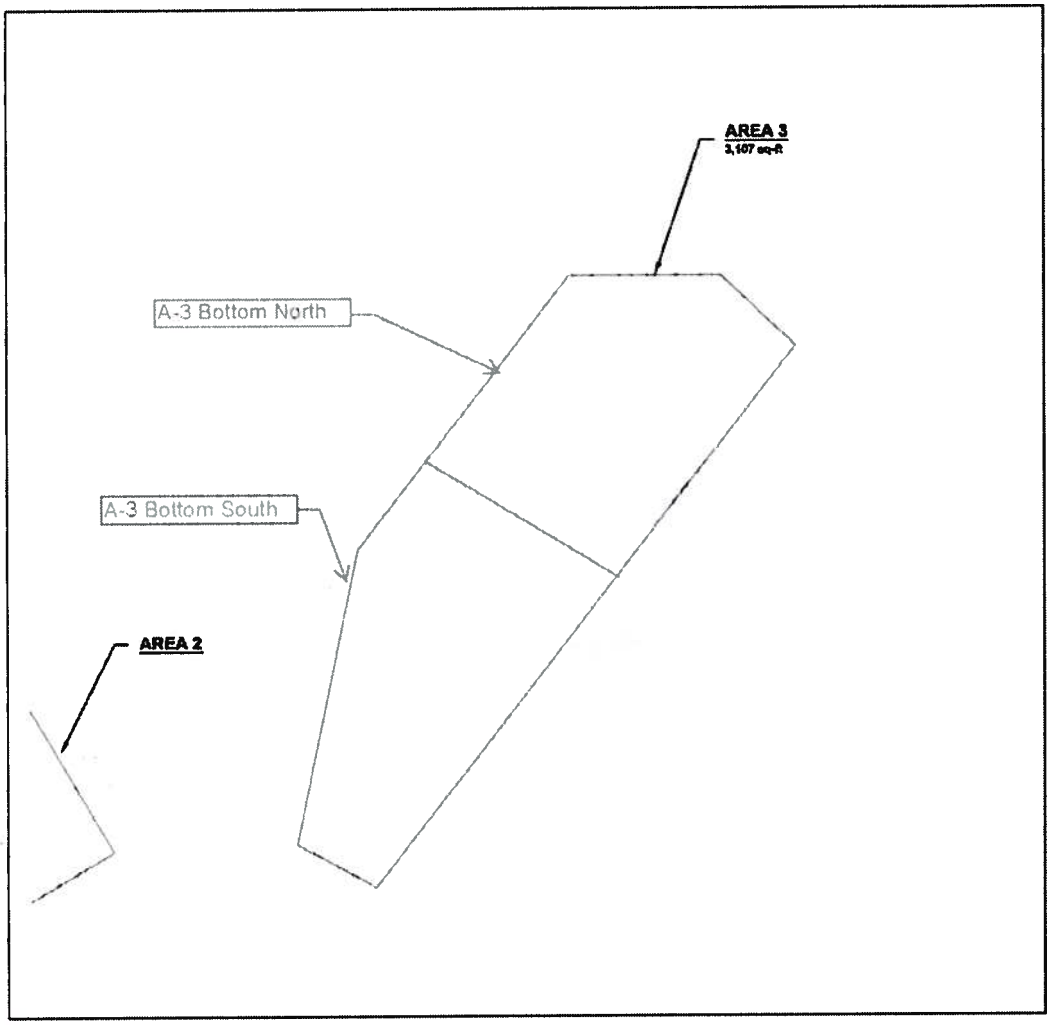


AREA 2
1" = 20'

20 0 20

LEGEND	
	PROPOSED LEAD EXCAVATION AREA OUTLINE
AREA 2 4,074 sq-ft	DESIGNATION FOR PROPOSED EXCAVATION AREAS AND SQUARE FOOTAGES FOR EACH AREA

AREA 2



AREA 3
1" = 20'

20 0 20

LEGEND	
	PROPOSED LEAD EXCAVATION AREA OUTLINE
AREA 3 3,107 sq-ft	DESIGNATION FOR PROPOSED EXCAVATION AREAS AND SQUARE FOOTAGES FOR EACH AREA
	GROUNDWATER MONITORING WELL

AREA 3

APPENDIX B

ANALYTICAL SUMMARY TABLES

APPENDIX B.1

EXCAVATION CONFIRMATION

SAMPLES

GULFPORT FERTILIZER PERFORMANCE MONITORING ACTIVITIES			
LEAD EXCAVATION AREAS & ANALYTICAL SUMMARY SHEET			
Lead Excavation Area # 2			
(Bottom Sample Interval = 1/1,000 ft²)			
(Sidewall Sample Interval = 1/100 L.F.)			
			Limit-3,800 mg/kg total Lead
Bottom Verification Samples (2-Feet)	**Total Lead (mg/kg)**		**Comments**
NORTH	2,700		Pass
SOUTH	90		Pass
MIDDLE	22,000		**Fail**
2nd excavation pass			
Bottom Verification Samples (3-Feet)	**Total Lead (mg/kg)**		**Comments**
MIDDLE	9.9		Pass
Sidewall Verification Samples	**Total Lead (mg/kg)**		**Comments**
SW-1 (A) NORTH	1,600		Pass
SW-2 (A) SOUTH	39		Pass
SW-3 (A) EAST	170		Pass
SW-4 (A) WEST	660		Pass
2nd Excavation Pass Area Middle			
SW-1 (B) NORTH	600		Pass
SW-2 (B) SOUTH	77		Pass
SW-3 (B) EAST	660		Pass
SW-4(B) WEST	30		Pass

GULFPORT FERTILIZER		
PERFORMANCE MONITORING ACTIVITIES		
LEAD EXCAVATION AREAS & ANALYTICAL SUMMARY SHEET		
Lead Excavation Area # 3		
		Limit-3,800 mg/kg Total Lead
Bottom Verification Samples (2-Feet)	Total Lead (mg/kg)	Comments
Section 1 SOUTH	370	Pass
Section 2 NORTH	37	Pass
Sidewall Verification Samples	Total Lead (mg/kg)	Comments
SW-1 (A) NORTH	58	Pass
SW-2 (A) SOUTH	140	Pass
SW-3 (A) EAST	190	Pass
SW-4 (A) WEST	210	Pass

GULFPORT FERTILIZER			
PERFORMANCE MONITORING ACTIVITIES			
LEAD EXCAVATION AREAS & ANALYTICAL TESTING FIELD TRACKING LOG			
Lead Excavation Area # 5			
			Limit-3,800 mg/kg Total Lead
Bottom Verification Samples (2-Feet)	Total Lead (mg/kg)		Comments
Section 1	310		Pass
Section 2			
Bottom Verification Samples (3-Feet)	Total Lead (mg/kg)		Comments
Section 1			
Section 2			
Sidewall Verification Samples	Total Lead (mg/kg)		Comments
SW-1 (A) SOUTH	1,500		Pass
SW-2 (A) NORTH	310		Pass
SW-3 (A) EAST	650		Pass
SW-4 (A) WEST	200		Pass

GULFPORT FERTILIZER			
PERFORMANCE MONITORING ACTIVITIES			
LEAD EXCAVATION AREAS & ANALYTICAL SUMMARY SHEET			
Lead Excavation Area # 8			
			Limit-3,800 mg/kg Total Lead
Bottom Verification Samples (2-Feet)		Total Lead (mg/kg)	Comments
Bottom		19	Pass
Sidewall Verification Samples		Total Lead (mg/kg)	Comments
SW-1 (A) WEST		11	Pass
SW-2 (A) SOUTH		34	Pass
SW-3 (A) NORTH		45	Pass
SW-4 (A) EAST		N/A Concrete Wall	

GULFPORT FERTILIZER		
PERFORMANCE MONITORING ACTIVITIES		
LEAD EXCAVATION AREAS & ANALYTICAL SUMMARY SHEET		
Lead Excavation Area P1S8		
		Limit-3,800 mg/kg Total Lead
Bottom Verification Samples (2-Feet)	**Total Lead (mg/kg)**	**Comments**
Bottom	200	Pass
Sidewall Verification Samples	**Total Lead (mg/kg)**	**Comments**
SW-1 (A) WEST	420	Pass
SW-2 (A) SOUTH	1,500	Pass
SW-3 (A) NORTH	1,400	Pass
SW-4 (A) EAST	37	Pass

APPENDIX B.2

SOIL STOCKPILE SAMPLES

GULFPORT FERTILIZER			
PERFORMANCE MONITORING ACTIVITIES			
EXCAVATION SOIL STOCKPILES			
Before Treatment			
Soil Stockpile #	**Sample Date**	**TCLP Lead (mg/L)**	**Comments**
1	5/29/2008	0.13	PASS
2	5/29/2008	<0.05	PASS
3	5/22/2008	49	FAIL-TCLP LEAD
4	5/22/2008	110	FAIL-TCLP LEAD
5	5/22/2008	84	FAIL-TCLP LEAD
6	5/22/2008	58	FAIL-TCLP LEAD
7	5/22/2008	11	FAIL-TCLP LEAD
8	5/22/2008	75	FAIL-TCLP LEAD
9	5/29/2008	0.94	PASS
10	6/2/2008	88	FAIL-TCLP LEAD
After Treatment			
Soil Stockpile #	**Sample Date**	**TCLP Lead (mg/L)**	**Comments**
3	7/21/2008	0.087	PASS
4	7/22/2008	<0.05	PASS
5	7/22/2008	0.28	PASS
6	7/21/2008	0.69	PASS
7	7/19/2008	0.46	PASS
8	7/17/2008	0.69	PASS
10	7/24/2008	<0.05	PASS

APPENDIX B.3

AIR QUALITY SAMPLES

GULFPORT FERTILIZER			
PERFORMANCE MONITORING ACTVITIES			
AIR SAMPLING			
	ARSENIC	**LEAD**	**Comments**
OSHA Action Levels	5µg/m3	30µg/m3	
Sample Location	**RESULTS**	**RESULTS**	
AREA-5			
UP-WIND	< 0.44µg/m3	< 0.56µg/m3	Below OSHA Action Levels
DOWN-WIND	< 0.44µg/m3	< 0.56µg/m3	Below OSHA Action Levels
EXCAVATOR OPERATOR	< 0.44µg/m3	< 0.56µg/m3	Below OSHA Action Levels
AREA-8	< 0.44µg/m3		Below OSHA Action Levels
UP-WIND	< 0.44µg/m3	< 0.56µg/m3	Below OSHA Action Levels
DOWN-WIND	< 0.44µg/m3	< 0.56µg/m3	Below OSHA Action Levels
EXCAVATOR OPERATOR	< 0.44µg/m3	< 0.56µg/m3	Below OSHA Action Levels

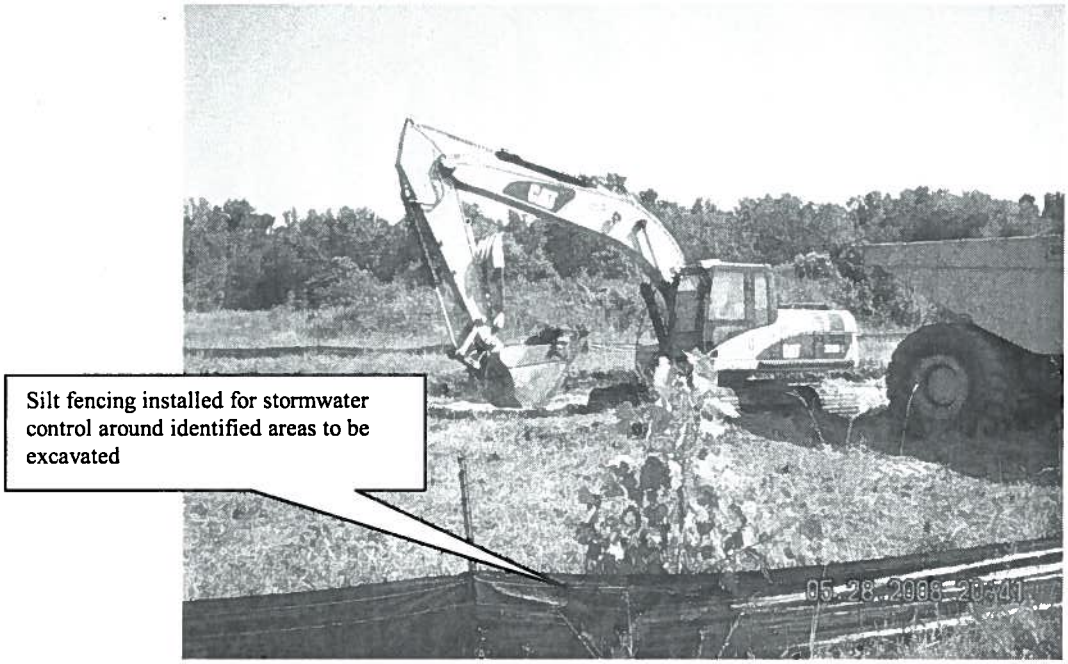
APPENDIX C

REPRESENTATIVE SITE PHOTOGRPAHS

Concrete slab, approximate center of original 33 acres of Glfprt Fertilizer Property. Photo taken towards the south southwest.

Area #2 identified before excavation & stormwater controls (e.g. silt fence installation). Photo taken towards the north northwest.

Areas #2 and #3 identified with stakes. Photo taken towards the north.



Representative photo of excavation of identified areas. Note: transfer truck staying out of excavated area.

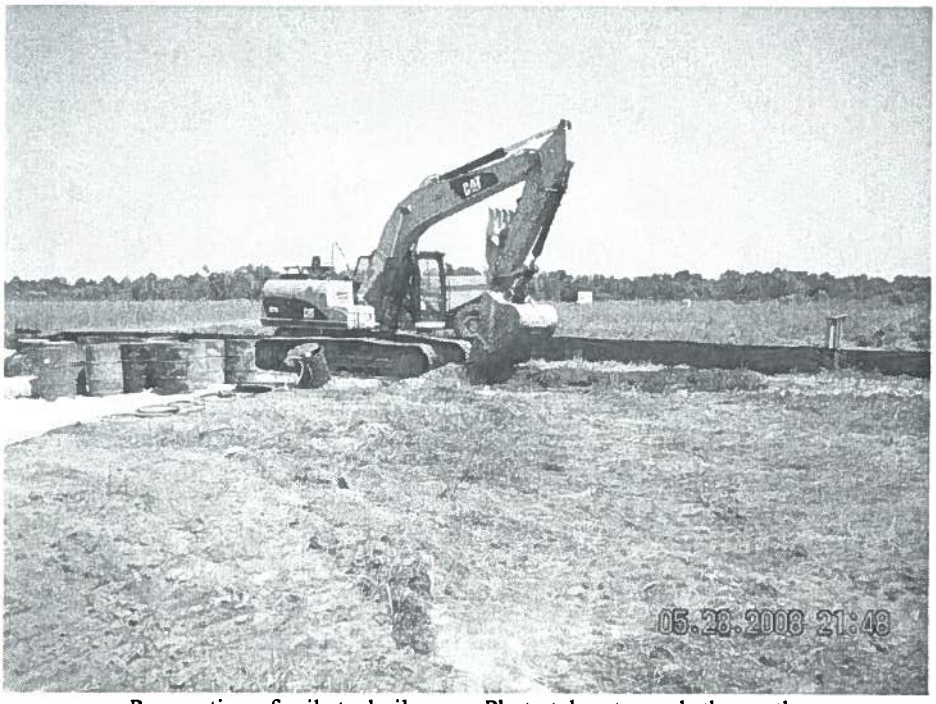
Representative photo of excavation of identified areas.

NORM areas.

NORM area fenced. Photo taken towards the north.

NORM area fenced. Photo taken towards the north.

NORM area fenced. Photo taken towards the north northwest.



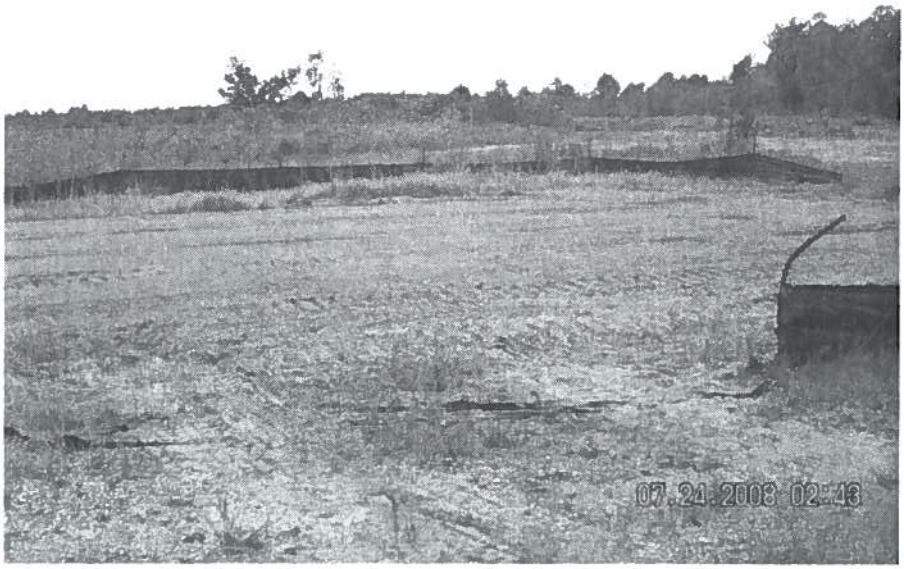
Preparation of soil stockpile area. Photo taken towards the north.

Soil stockpile area. Photo taken towards the north northeast.

Same as previous photograph

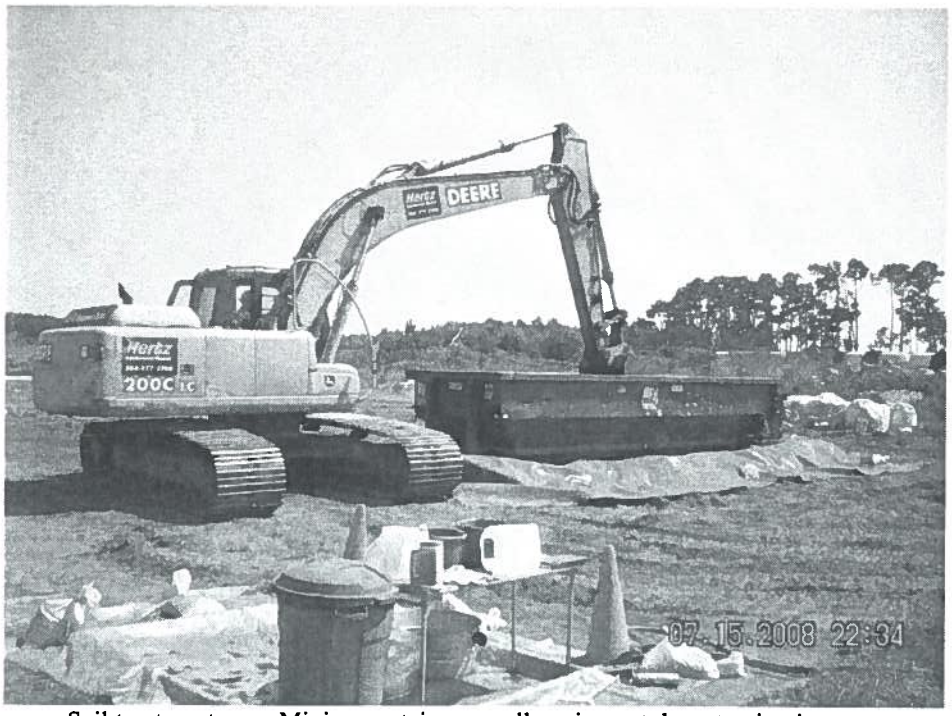
Representative photo of identified areas being excavated.

Representative photo of covered soil stockpiles



Representative photo of backfilled, graded of excavated identified areas

Treated soil stockpile area.



Soil treatment area. Mixing container, small equipment decontamination area

Soil amendment material

Backfilling of previously excavated areas

Soil treatment mixing container. Soil and treatment amendment material.

APPENDIX D

ANALYTICAL REPORT SHEETS

AREA 2

CLEARANCE SAMPLES

(LIMITS OF EXCAVATION)

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

Parameter	As Received	RDL	Dry Result	RDL	Units	Method	Date
Total Solids	[illegible]		[illegible]		%	[illegible]	[illegible]
Lead	[illegible]	[illegible]	[illegible]	[illegible]	mg/kg	[illegible]	[illegible]

[illegible]

Page [illegible] of [illegible]

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SCIENCE CORP.

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est. 1970

REPORT OF ANALYSIS

May 27, 2008

Mr. Tony Dawson
Evaporator's Accumulator
1036 Pope Ferry Road, Suite ME
Biloxi, MS 39532

ESC Sample # :

Date Received : May 23, 2008
Description : Coalport Fertilizer

Site ID : 4967

Sample ID : ARKA / BOTTOM MIDDLE

Project # : 4967

Collected by : Anthony Dawson
Collection Date : 05/22/08 08:00

Parameter	As Received	MDL	Dry Result	MDL	Units	Method	Date
Total Solids	97.0		97.0		%	2540G	05/24/08
Lead	19700	1.6	20300	1.7	mg/kg	6020B	05/26/08

MDL - Method Detection Limit
MQL - Method Quantitation Limit (EQL)
Notes:
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ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

Mr. Troy Fontaine
Cornerstone & Associates
1780 Eagle Ferry Road, Suite MF
Hillcrest, MS 39630

May 21, 2008

ESC Sample # : [illegible]

Date Received : May 20, 2008
Description : Gulfport Facilities

Site ID : [illegible]

Sample ID : AREA 7 BOTTOM DIRTH

Project # : [illegible]

Collected By : Anthony Fontaine
Collection Date : 05/20/08 08:00

Parameter	Milligrams	RDL	Kilograms	RDL	Units	Method	Date
Total Solids	86.7		86.7		%	2540G	05/21/08
Lead	1400	0.25	2700	0.29	mg/kg	6010B	05/23/08

MDL - Method Detection Limit
RDL - Reporting Limit or Estimated Quantitation Limit(EQL)
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REPORT OF ANALYSIS

May 27,2008

Mr. Tony Damiano
Division 6 Associates
1604 Eagle Ferry Road, Suite M6
Macon, MO 63552

ESC Sample # : L449412-02

Date Received : May 23, 2008
Description : Gulfport Fertilizer

Site ID : 4367

Sample ID : AREA 1 BOTTOM SOUTH

Project # : 4367

Collected By :
Collection Date : 05/21/08 08:00

Parameters	Q	Wet Wt %	ADL	Q	Result	ADL	Units	Method	Date
Total Solids		97.2			97.2		%	2540G	05/24/08
Lead		75.	0.25		90.	6.2*	mg/kg	6010B	05/23/08

ADL - Adjusted Detection Limit
RDL - Reporting Limits Estimated Quantitation Limits(EQL)
Notes:
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ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

May 27, 2008

Ms. Mary Dahlke
Crompton & Associates
2600 Dallas Parkway, Suite 600
Frisco, TX 75034

Date Received : May 23, 2008
Description : Gulfport Fertilizer

Sample ID : AREA: SIDEWALL NORTH

Collected by : Anthony Dahlke
Collection Date : 05/22/08 08:00

ESC Sample # : L046431-04

Site ID : 4047

Project # : 4047

Parameters	As Received	PQL	Dry Result	PQL	Units	Method	Date
Total Solids	96.4		96.4		%	2540G	05/24/08
Lead	1300	0.25	1400	0.27	mg/kg	6010B	05/31/08

PQL = Practical Quantitation Limit
MDL = Detection Limit= Estimated Quantitation Limit (EQL)
Notes:
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REPORT OF ANALYSIS

May 29, 2008

Mr. Troy Damiano
Covington & Associates
1430 Pippa Ferry Road, Suite 90
Biloxi, MS 39532

ESC Sample # : L040452-07

Date Received : May 21, 2008
Description : Multiport Fertilizer

Site ID : 4947

Sample ID : AREA 2 SIDEWALL WEST

Project # : 4947

Collected By : Anthony Damiano
Collection Date : 05/21/08 10:00

Parameter	W.Result	RDL	D.Result	RDL	Units	Method	Date
Total Solids	97.7		97.7		%	2540G	05/24/08
Lead	530	1.25	542	1.28	mg/kg	6010B	05/28/08

RDL = Reporting Detection Limit
EDL = Detection Limit+ Estimated Quantitation Limit (EQL)
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REPORT OF ANALYSIS

May 27,2009

Mr. Troy Samson
C Vaughn & Associates
1450 Royal Ferry Road, Suite 98
Biloxi, MS 39532

ESC Sample # : L494512-08

Date Received : May 13, 2009
Description : Gulfport Fertilizer

Site ID : 9997

Sample ID : AREA 2 SIDEWALL EAST

Project # : 9997

Collected by : Anthony Samson
Collection Date : 05/05/09 08:00

Parameter	As Received	POL	Dry Result	POL	Units	Method	Date
Total Solids	87.1		87.1		%	2540G	05/14/09
Lead	140	1.25	170	1.54	mg/kg	6010B	05/14/09

POL - Practical Quantitation Limit
MDL - Method Detection Limit= Estimated Quantitation Limit (EQL)
Note:
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AREA 2

SECOND EXCAVATION PASS

CLEARANCE SAMPLES

(LIMITS OF EXCAVATION)

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REPORT OF ANALYSIS

Date 05/30/08

Mr. Tony Lawless
Stoughton & Associates
1484 Poppy Ferry Road, Suite MF
Biloxi, MS 39532

ESC Sample # : L447063-08

Date Received : May 30, 2008
Description : Gulfport Fertilizer

Site ID : 4097

Sample ID : AC-GND PAD SIDEWL N

Project # : 4097

Collected By :
Collection Date : 05/23/08 08:00

Parameter	Wet Wt	RDL	Dry Wt	RDL	Units	Method	Date
Total Solids	88.3		88.3		%	2540G	05/30/08
Lead	450	1.25	500	1.28	mg/kg	6010B	06/02/08

WET = Result Reported on Wet Weight Basis
RDL = Reporting Limit- Estimated Quantitation Limit (EQL)
Note:
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ext. 1570

REPORT OF ANALYSIS

Date:

Mr. Tony Ramsey
Crumpton & Associates
1630 Pope Terry Road, Suite M8
Hiram, GA 30141

ESC Sample # :

Date Received : May 29, 2008
Description : Coalport Fertilizer

Site ID :

Sample ID : AC-2ND PASS SCREWL S

Project # :

Collected By :
Collection Date : 05/29/08 09:00

Parameter	As Received	MDL	Dry Result	RDL	Units	Method	Date
Total Solids	87.2		87.2		%	2540G	06/04/08
Lead	6.7	1.25	7.7	5.19	mg/kg	6010B	05/31/08

MDL - Below Detection Limit
RDL - Reporting Limit or Estimated Quantitation Limit (EQL)
N/Cal
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Reported: Solution Basis: Results Corrected

ENVIRONMENTAL
SCIENCE CORP.

REPORT OF ANALYSIS

Mr. Tony Lamano
Civilation & Associates
1484 Frank Tipton Road, Suite 9B
Knoxville, TN 37950

Date Received : May 30, 2008
Description : Gallport Fertilizer

Sample ID : ACCORD FARM SPREAD B

Collected By :
Collection Date : 05/29/2008 08:00

Parameter	Wt.Result	PQL	D.Result	PQL	Units	Method	Date
Total Solids	85.7		85.7		%	2540G	05/30/08
Lead	570	1.25	665	0.94	mg/kg	6010B	06/11/08

PQL - Project Quantitation Limit
MDL - Method Detection Limit, Estimated quantitation Limit(EQL)
Note:
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REPORT OF ANALYSIS

Date 05/30/08

Mr. Tony Fantano
Civilation & Associates
1626 Ferry Ferry Road, Suite MF
Salem, NH 03530

Data Received : May 30, 2008
Description : Gallipot Fertilizer

Sample ID : AS-260 FAAS Digest W

Collected By :
Collection Date : 05/28/08 09:30

ESC Sample # : L311762-07

Site ID : 4067

Project # : 4067

Parameter	As received	MDL	Solvent	MDL	Units	Method	Date
Total Solids	48.7		68.5		%	2540G	06/04/08
Lead	26.	0.25	38.	0.36	mg/kg	6010B	06/12/08

BDL - Below Detection Limit
MDL - Detection Limit= Estimated Quantitation Limit(EQL)
Notes:
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AREA 3

CLEARANCE SAMPLES

(LIMITS OF EXCAVATION)

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Tennessee Certification

Lab. I.D.

REPORT OF ANALYSIS

May 24, 2006

Mr. Tony Damiano
Damiano & Associates
2020 Dulles Ferry Road, Suite M3
Vienna, WA 20572

EST Sample # : [illegible]

Date Received : May [illegible], 2006
Description : Sulphur Fertilizer

Site ID : 4247

Sample ID : ARKA 1 BOTTOM SOUTH

Project # : 4247

Collected By : Anthony Damiano
Collection Date : 05/22/06 14:05

Parameter	Weight	RDL	Results	MDL	Units	Method	Date
Total Solids	99.6		99.6		%	2540G	05/24/06
Lead	250	0.25	320	0.19	mg/kg	6010B	05/24/06

RDL - Reliable Detection Limit
MDL - Method Detection Limit- Estimated Quantitation Limit(EQL)
Note:
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TDEC I.D. 01-0416-03

DOE: 1370

REPORT OF ANALYSIS

May 27, 2000

Mr. Tony Damiano
Civilation & Associates
1420 Kings Bluff Road, Suite 95
Pooler, GA 31322

ESC Sample # : L241420-04

Date Received : May 24, 2000
Description : Gulfport Fertilizer

Site ID : 9297

Sample ID : ASHAY SIDEWALL SOUTH

Project # : 9297

Submitted By : Anthony Damiano
Collection Date : 05/23/00 17:10

Parameter	As Received	RDL	Detection Limit	MDL	Units	Method	Date
Total Solids	97.4		0.1		%	2540G	05/26/00
Lead	150	1.20	180	0.12	mg/kg	6010B	05/26/00

RDL - Reliable Detection Limit
MDL - Method Detection Limit- Estimated Quantitation Limit (EQL)
Note:
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REPORT OF ANALYSIS

Mr. Tony Zamiello
Operations & Maintenance
1424 Ridge Ferry Road, Suite M5
Edgewood, MD 21040

May 24, 2000

ESC Sample # : L0407501-02

Date Received : May 21, 2000
Description : Gallipoli Ferrisburg

Site ID: 4947

Sample ID : AREA 7 BOTTOM NORTH

Project # : 4947

Collected by : Anthony Zamiello
Collection Date : 05/21/00 15:00

Parameter	As Received	MDL	Dry Result	ADL	Units	Method	Date
Total Solids	94.5		94.5		%	2540G	05/24/00
Lead	31.	1.05	33.	1.10	mg/kg	6010B	05/24/00

MDL - Method Detection Limit
ADL - Detection Limit- Estimated Quantitation Limit (EQL)
Notes:
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REPORT OF ANALYSIS

May 27, 2009

Mr. Tony Dawson
Creighton & Associates
1634 Trinity Valley Road, Suite 350
Atlanta, GA 77573

ESC Sample # : L447631-02

Date Received : May 20, 2009
Description : Coalfoot Fertilizer

Site ID : 9747

Sample ID : AREA1 SIDEWALL NORTH

Project # : 9747

Collected By : Anthony Dawson
Collection Date : 05/20/09 11:05

Parameter	Result	RDL	Dilution	MDL	Units	Method	Date
Total Solids	86.1		50.5		%	2540G	05/24/09
Lead	5.0	0.25	1.2	0.07	mg/kg	6010B	05/22/09

RDL = Reporting Detection Limit
MDL = Method Detection Limit/Minimum Quantitation Level (MQL)
Note:
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REPORT OF ANALYSIS

May 24,2006

Mr. Tony Dawland
Cyclaptor & Associates
1020 Pine Ivey Road, Pine Mt
Biloxi, MS 39532

ESC Sample # : L<illegible>

Date Received : May 15, 2006
Description : Gulfport Fertilizer

Site ID : 9060

Sample ID : AREA 1 .ITEWALL EAST

Project # : 1067

Submitted By : Anthony Dawland
Collection Date : 05/<illegible>/06 <illegible>

Parameter	Results	MDL	Reporting Limit	DF	Units	Method	Date
Total Solids	97.5		0.10	1	%	2540G	05/24/06
Lead	160	0.25	100	0.25	mg/kg	6010B	05/24/06

BDL = Below Detection Limit
MDL = Detection Limit= Estimated Concentration Limit(EQL)
Notes:
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REPORT OF ANALYSIS

May 29, 2008

Mr. Trey Lemley
Crenshaw & Associates
1201 Tyree Perry Road, Suite 9B
Athens, AL 35611

ESC Sample # : L314720-06

Date Received : May 23, 2008
Description : Gallport Fertilizer

Site ID : 9287

Sample ID : AREA 1 SIDEWALL WEST

Project # : 9287

Collected By : Anthony Lemley
Collection Date : 05/22/08 07:30

Parameter	As received	RDL	Dry result	RDL	Units	Method	Date
Total Solids	95.1		95.1		%	2540G	05/24/08
Lead	110	0.55	116	0.58	mg/kg	6010B	05/27/08

RDL - Reple Detection Limit
MDL - Method Detection Limit/Estimated Quantitation Limit (EQL)
Note:
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AREA 5

CLEARANCE SAMPLES

(LIMITS OF EXCAVATION)

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

May 29, 2008

Mrs. Tracy Ramsaur
Dynamic & Associates
1484 Kelly Ferry Road, Suite 140
Duluth, GA 30132

ESC Sample # : L[illegible]

Date Received : May [illegible], 2008
Description : Sulfur-Get Fertilizer

Site ID : [illegible]

Sample ID : AREA-1 E. SIDE WALL

Project # : [illegible]

Collected By : Anthony Ramsaur
Collection Date : 05/21/08 [illegible]

Parameter	As Result	POL	Dl Result	Dl	Units	Method	Date
Total Solids	96.2		96.2		%	2540G	05/23/08
Lead	160	1.25	450	0.29	mg/kg	6020A	05/23/08

POL - Practical Quantitation Limit
PQL - Detection Limit - Estimated Quantitation Limit (EQL)
Note:
The reported analytical results relate only to the sample submitted.
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Laboratory Director Regina Bridges 05/29/08 [illegible]

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SCIENCE CORP.

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REPORT OF ANALYSIS

Mr. Tony Damiano
Crenshaw & Associates
2674 Hope Ferry Road, Suite H6
Pleasant, NC 28576

May 06, 2008

Date Received : May 01, 2008
Description : Gulfport Fertilizer

Sample ID : AREA 4 BOTTOM EP 1FT

Collected by : Anthony Damiano
Collection Date : 05/01/08 14:10

ESC Sample # : L194021-01

Site ID : 4567

Project # : 4567

Parameter	As Received	RDL	Dry Result	RDL	Units	Method	Date
Total Solids	96.1		96.1		%	160.3	05/02/08
Lead	230	0.26	232	0.259	mg/kg	6010B	05/02/08

RDL - Value Detection Limit
RDL - Reflection Limit= Estimated Quantitation Limit (EQL)
Notes:
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Reported: 05/06/08 16:52 Printed: 05/06/08 16:52

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

May [illegible]

Mr. Tony Damiano
Corvallis & Associates
2400 Pleasant Hill Road, Suite 300
Duluth, GA 30136

ESC Sample # : [illegible]

Date Received : May [illegible]
Description : Gulfport Fertilizer

Site ID : [illegible]

Sample ID : AREA 6 N. SIDE WALL

Project # : [illegible]

Collected By : Anthony Damiano
Collection Date : 05/21/08 [illegible]

Parameter	As Received	Dry	Detection Limit	Dry	Units	Method	Date
Total Solids	85.7		0.1		%	1340/D	05/23/08
Lead	160	186	130	151	mg/kg	6010B	05/23/08

BDL = Below Detection Limit
PQL = Reporting Limit= Estimated Quantitation Limit (EQL)
Note:
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Reportedt Criteria Land Fertilizer 05/23/08 [illegible]

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Tax I.D. 62-1814187

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REPORT OF ANALYSIS

Mr. Tony Campisano
Clayton & Associates
2424 Poppy Ferry Road, Suite 305
Biloxi, MS 39532

May 30, 2008

Date Received : May 21, 2008
Description : Gulfport Petroleum

ESC Sample # : L344172-01

Site ID : 4547

Sample ID : AREA-1 S. SIDE WALL

Project # : 1040

Collected By : Anthony Campisano
Collection Date : 05/21/08 14:15

Parameter	As Received	MDL	As Received	PQL	Units	Method	Date
Total Solids	99.0		99.0		%	2540G	05/23/08
Lead	1400	1.25	1500	7.52	mg/kg	6010B	05/23/08

MDL - Method Detection Limit
PQL - Practical Quantitation Limit/EQL - Estimated Quantitation Limit(EQL)
Notes:
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ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

Parameter	Result	RDL	Amount	MDL	Units	Method	Date
Total Solids	91.4		91.4		%	160G	05/23/08
Lead	110	0.25	110	0.23	mg/kg	6010B	05/23/08

RDL - Reporting Limit
MDL - Detection Limit= Estimated Quantitation Limit(EQL)
Note:
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Reported: [illegible]

Page 1 of 1

AREA 8

CLEARANCE SAMPLES

(LIMITS OF EXCAVATION)

ENVIRONMENTAL
SCIENCE CORP.

[illegible]
Mt. Juliet, TN 37122
(615) 758-5858
[illegible]
Fax (615) 758-5859

Facility ID#[illegible]

Dept: 1400

REPORT OF ANALYSIS

May 29, 2008

Mr. Tony Damiano
Civilation & Associates
1691 Three Fairy Road, Suite 5E
Atlanta, MD 30076

PDC Sample # : L1044731-08

Date Received : May 22, 2008
Description : Gulfport Fertilizer

Site ID : 30307

Sample ID : AREA 4 SOUTH WALL

Project # : 1000

Collected By : Anthony Damiano
Collection Date : 05/21/08 17:00

Parameter	As Result	ADL	Dilution	RDL	Units	Method	Date
Total Solids	94.0		0.1		%	1540G	05/23/08
Lead	15.	1.5	10.	0.30	mg/kg	6010B	05/23/08

RDL = Reporting Detection Limit
MDL = Detection Limit= Estimated quantitation Limit(EQL)
Note:
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(615) 758-5859
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Est. 1970

REPORT OF ANALYSIS

May 14, 2008

Mr. Tony Ramsey
Cavanaugh & Associates
1207 Pete Jerry Road, Suite MF
Edgar, MT 59031

ESC Sample # : L494121-07

Date Received : May 02, 2008
Description : Gallipot Fertilizer

Site ID : 4947

Sample ID : AREA-8 WEST WALL

Project # : 4947

Collected by : Anthony Ramsey
Collection Date : 05/01/08 11:00

Parameter	As Received	MDL	Dry Result	PQL	Units	Method	Date
Total Solids	88.7		88.7		%	2540G	05/13/08
Lead	9.3	0.25	10.	0.28	mg/kg	6010B	05/12/08

PQL - Polish Quantitation Limit
MDL - Method Detection Limit- Estimated Quantitation Limit(EQL)
Notes:
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Reported: 05/14/08 Issue Revised: 05/28/08 Issue

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1-800-367-7284
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Tax Exempt No. 58-1564917

REPORT OF ANALYSIS

May 19, 2008

Mr. Tony Ramirez
Cleanaire & Associates
1000 Piney Perry Road, Suite 100
Acworth, GA 30102

Date Received : May 16, 2008
Description : Gulfport Fertilizer

Sample ID : AREA 4 BOTTOM SS

Collected By : Anthony Ramirez
Collection Date & Time : 05/15/08 17:00

EMC Sample # : L0804231-04

Site ID # : 9047

Project # : 4747

Parameter	Result	RDL	Result	RDL	Units	Method	Date
Total Solids	99.2		99.2		%	2540G	05/19/08
Lead	16.	0.50	16.	0.50	mg/kg	6010B	05/19/08

RDL = Reporting Detection Limit
MDL = Detection Limits Estimated Quantitation Limits (EQL)
Notes:
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Reported: Collection Date Printed: Collection Date

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

Parameter	Measured	RDL	Allowable	RDL	Units	Method	Date
Total Solids	87.4		90.4		%	160.3	05/23/08
Lead	36.	1.25	45.	1.11	mg/kg	6010B	05/23/08

RDL = Below Detection Limit
RDL = Detection Limit= Estimated Quantitation Limit (EQL)
Notes:
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AREA P1S8

CLEARANCE SAMPLES

(LIMITS OF EXCAVATION)

ENVIRONMENTAL
SCIENCE CORP.

REPORT OF ANALYSIS

Mr. Tony Damiano
Clearwater & Associates
2418 Dogwood Ferry Road, Suite M5
Kinsey, MS 39532

Date Received : June 04, 2008
Description : Chilipost Fertilizer

Sample ID : AREA FOR STOCKPILE SAMP

Submitted By : Tony Damiano
Collection Date & Time : 06/03/08 09:30

ESC Sample # : L495011-04

Site ID : 0991

Project # :

Parameter	Weight	MDL	Reporting Limit	Dilution Factor	Units	Method	Date
Total Solids	94.6		94.6	1	%	2540G	06/04/08
Lead	32.	0.20	20.	0.25	mg/kg	6010B	06/10/08

MDL - Method Detection Limit
RDL - Reporting Limit- Estimated Quantitation Limit (EQL)
Notes:
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Reported: Projected Delivery Date

Page 1 of 1

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

Mr. Tony Pantano
Carmichael & Associates
2424 Percy Perry Road, Perry MS
Hillcrest, MS 39578

Date: 04/[illegible]/2008

ESC Sample # : L[illegible]

Date Received : 04/[illegible]/2008
Description : Multiplex fertilizer

Sample ID : AREA 2176 SIDEWALL NORTH

Project # :

Collected By : Tony Pantano
Collection Date : 04/07/08 09:00

Parameter	Weight	MDL	Quantity	PQL	Units	Method	Date
Total Solids	97.4		97.4		%	2540G	04/09/08
Lead	1200	3.05	1400	9.15	mg/kg	6010B	04/03/08

MDL = Method Detection Limit
PQL = Practical Quantitation Limit/Reporting Limit
Notes:
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Reference: Principles of Soil Chemistry

Page 1 of 1

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Dec. 1998

REPORT OF ANALYSIS

Date: 06/30/08

Mr. Tony Ewing
Cavanaugh & Associates
1600 Ridge Ferry Road, Suite 8B
Hixson, TN 37343

ESC Sample # : L040031-02

Date Received : June 05, 2008
Description : Multiplex Fertilizer

Site ID : 4997

Sample ID : AREA FLUE SIDEWALL SOUTH

Project # :

Collected By : Tony Ewing
Collection Date : 06/02/08 09:00

Parameter	As Received	MDL	Dry Result	MDL	Units	Method	Date
Total Solids	94.1		98.0		%	2540G	06/06/08
Lead	1300	.105	1330	.124	mg/kg	6010B	06/13/08

MDL - Method Detection Limit
RDL - Reporting Limit- Estimated Quantitation Limit(EQL)
Qual
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Reported: Revised Duration 24140

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

Date Received : [illegible]
Description : Coldspot Fertilizer

Sample ID : AREA 1004 SIDEWALL NE/S

Collected By : T. Jay Chapman
Collection Date & Time : [illegible]

[illegible]

Project # :

Parameter	Result	PQL	Detection Limit	Dilution	Units	Method	Date
Total Solids	[illegible]		[illegible]		%	[illegible]	[illegible]
Lead	270	0.25	0.25	5.10	mg/kg	6010B	04/03/08

PQL = Practical Quantitation Limit
MDL = Detection Limit (Estimated Quantitation Limit (EQL))
Notes:
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Definitions: Method Detection Limit

[illegible]

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1-800-767-5859
Fax (615) 758-5859

Fax also 615-758-5860

ESC 1320

REPORT OF ANALYSIS

Mr. Tony Ramirez
Civilutia & Associates
1000 Ferry Ferry Road, Suite 88
Ellicott, MD 21042

Date: 06/01/2009

ESC Sample # : L[illegible]-06

Date Received : June 02, 2009
Description : Gulfport Fertilizer

Site ID : 9287

Sample ID : AREA Five BOTTOM

Project # :

Collected by : Tony Ramirez
Collection Date : 06/02/09 [illegible]

Parameter	W.Result	RDL	D.Result	RDL	Units	Method	Date
Total Solids	94.4		94.4		%	2540G	06/04/09
Lead	170	1.25	200	1.25	mg/kg	6020A	06/08/09

RDL - Below Detection Limit
RDL - Detection Limit= Estimated quantitation limit(EQL)
Notes:
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Reporting: Printed individual items

SOIL STOCKPILES

NO TREATMENT REQUIRED

STOCKPILES 1, 2 AND 9

ENVIRONMENTAL
SCIENCE CORP.

[illegible]
Est. 1970

REPORT OF ANALYSIS

Date [illegible]

Mr. Tony Dahlman
Clayton & Associates
1000 Eagle Ferry Road, Suite MS
Atlanta, MS 30502

SES Sample # : [illegible]

Date Received :
Description :

Site ID : 4247

Sample ID :

Project :

Collected By :
Collection Date :

Parameter	Result	Det. Limit	Units	Limit	Method	Date/Time	By
TCLP Extraction	-				1311		
Lead	1.49	0.050	mg/l	5.0	6010B		

ND - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)
Limit - Maximum Contaminant Level as established by the US EPA
Notes:
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Reported to/and [illegible] Printed: [illegible]

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Dec. 2008

REPORT OF ANALYSIS

Date: 12/3/2008

Mr. Tony Dahlem
Cleveland & Associates
1424 Pine Tree Road Suite 8B
Orlando, FL 32808

ESC Sample # : L187761-01

Date Received : May 30, 2008
Description : Multiple Fertilizers

Site ID : 4197

Sample ID : SOIL STOCKPILE 1

Project : 4197

Submitted By :
Collection Date : 05/29/08 08:00

Parameter	Result	Det. Limit	Units	Limit	Method	Date/Time	By	Ref.
TCLP Extraction	-				SW1	05/31/08 07:12	AJW	1
Lead	7.47	0.050	mg/l	5.0	6010B	06/02/08 10:06	DAL	1

ND - Below Detection Limit
Det. Limit - Estimated Quantitation Limit (EQL)
Limit - Maximum Contaminant Level as established by the EPA
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REPORT OF ANALYSIS

June 03, 2008

Mr. Tony Damiani
Civiltech & Associates
1255 Lynn Fery Road, Suite 89
Biloxi, MS 39532

ESC Sample # : L317563-02

Date Received : May 30, 2008
Description : Gulfport Fertilizer

Site ID : 4047

Sample ID : 2031 STOCKPILE 3

Project # : 4047

Collected By :
Collection Date : 05/29/08 10:00

Parameter	Result	Det. Limit	Units	Limit	Method	Date/Time	By	Dil
TCLP Extraction	-				1311	06/02/08 09:00	ANM	1
Lead	BDL	0.50	mg/l	5.0	6010B	06/02/08 20:09	DMJ	1

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)
Limit - Maximum Contaminant Level as established by the US EPA
Notes:
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Reported: 06/03/08 20:57 Printed: 06/03/08 08:18

SOIL STOCKPILES

3,4,5,6,7,8 AND 10

UNTREATED AND REQUIRING TREATMENT

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(301) 754-7355
2dotlab@aol.com
Fax (301) 754-7357

Fax req. at Yellow

ext. 1370

REPORT OF ANALYSIS

May 27, 2008

Mr. Tony Sanders
Drainage & Associates
1024 Piney Ferry Road, Suite MS
Wilmot, MD 20832

EDT Sample # : 1304-08-0127

Date Received : May 23, 2008
Description : Gulfport Fertilizer

Site ID : 1437

Sample ID : STOCKPILE A

Project :

Collected By : Anthony Pantano
Collection Date : 05/22/08 1430

Parameter	Results	Det. Limit	Units	Limit	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	05/24/08 1040	MTA	1
Lead	ND	0.050	mg/l	5.0	6010B	05/26/08 0831	RSB	1

ND = Below Detection Limit
Det. Limit = Estimated Quantitation Limit(EQL)
Limit = Maximum Contaminant Level as established by the US EPA
Notes:
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Fax (615) 758-5859

Dec. 1998

TEST OF ANALYSIS

May 27, 2000

Mr. Doug Fenimore
Fenimore & Associates
1201 Page Ferry Road Suite 8B
Atlanta, GA 30318

ESC Sample # : L2000276-01

Date Received : May 25, 2000
Description : Coalport Fertilizer

Site ID : 4242

Sample ID : 2700112TA 3

Project :

Collected By : Anthony Diamond
Collection Date : 05/22/00 14:00

Parameter	Results	Det. Limit	Units	Dilut.	Method	Analysis Date	By	Qual
TCLP Extraction	-				1311	05/26/00 10:40	MTE	
Lead	ND	0.050	mg/l	5.0	6010B	05/26/00 17:51	BWB	

ND - Below Detection Limit
RDL Limit - Estimated Quantitation Limit(EQL)
Limit - Maximum Contaminant Level as established by the EPA
Notes:
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Reported: 05/27/00 10:00 Printed: 05/27/00 10:00

ENVIRONMENTAL
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[illegible]

REPORT OF ANALYSIS

[illegible]

Mr. Tony Zahlaw
Clearfork & Associates
1836 Poppa Ferry Road, Suite BG
Atlanta, GA 30453

May 27,2008

Date Received : May 23, 2008
Description : Coldpark Fertilizer

Sample ID : 070CLFFER 4

Collected By : Anthony Dubberly
Collection Date : 05/22/08 15:00

EAS Sample # : [illegible]

Rate ID : 4547

Project # :

Parameter	Result	Det. Limit	Units	Dil.	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	05/24/08 1048	MVS	
Lead	120	0.150	mg/l	5.0	6010B	05/28/08 0959	BSH	

BDL - Below Detection Limit
Det. Limit - Reporting Quantitation Limit(RQL)
Limit - Maximum Contaminant Level as established by EPA 40 FRA

Note:
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ENVIRONMENTAL
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[illegible]

REPORT OF ANALYSIS

[illegible]

Date Received : May 23, 2008
Description : Gillport Fertilizer

Sample ID : 0705231116-5

Collected By : Anthony Pomilio
Collection Date : 05/22/08 14:15

Parameter	Results	Det. Limit	Limit Units	Limit Check	Date/Time	CC	Dil.
Total Extraction	*			5211	05/24/08 11:48 TMS	1	
Lead	11.	0.050	mg/l	5.0	05/28/08 09:17 RSK	1	

BDL = Below Detection Limit
Det. Limit = Estimated Quantitation Limit(EQL)
Limit = Maximum Contaminant Level as established by the EPA
Note:
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[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]

REPORT OF ANALYSIS

[illegible]
[illegible]
[illegible]
[illegible]

[illegible]

Date Received : May [illegible], 2008
Description : Gulfport Fertilizer

Sample ID : STACEFFIE 4

Collected by : Anthony Pagliano
Collection Date : 05/22/08 [illegible]

[illegible]

Site ID : [illegible]

Project :

Parameter	Result	Det. Limit	Det. Limit Units	Limit	Units	Method	Date/Time	By	Qual
TCLP Extraction	-					1311	05/24/08 1040	MVE	
Lead	96.	0.05	mg/L	5.0	mg/L	6010B	05/26/08 2041	KAR	

[illegible]

BDL = Below Detection Limit
EDL, Limit = Estimated Quantitation Limit(EQL)
Limit = Maximum Contaminant Level as established by the US EPA
Note:
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ENVIRONMENTAL
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[illegible]

REPORT OF ANALYSIS

[illegible]

Date Received : [illegible]
Description : [illegible]

Sample ID : [illegible]

Collected By : [illegible]
Collection Date : [illegible]

[illegible]

Parameter	Result	Flag	Units	Dilution Factor	Limit	Method	Date/Time	By	Qual
TCLP Extraction	-					1311	[illegible]		
Lead	11.		mg/l	5.0	0.025	6010B	[illegible]		

ND - Below Detection Limit
Det. Limit - Determination Quantitation Capability
Limit - Maximum Concentration Level as established by the EPA
Note:
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SOIL STOCKPILES

TREATED

STOCKPILES 3,4,5,6,7,8 AND 10

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REPORT OF ANALYSIS

July 23, 2008

Mr. Tony Dahlman
Civilation & Associates
1221 Trapp Fanty Road Suite 9B
Hixson, TN 37343

SESC Sample # : L0810-01

Date Received : July 15, 2008
Description : Oil/grease partitioner

Sample ID : TP-4

Project :

Collected By :
Collection Date : 07/15/08 14:30

Parameter	Result	Det. Limit	Units	Limit	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	07/21/08 14:24	MDL	1
Arsenic	0.11	0.050	mg/l	5.0	6010B	07/22/08 12:53	AF	1
Lead	0.85	0.050	mg/l	5.0	6010B	07/22/08 12:53	AF	1

MDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(s).
Limit - Maximum Contaminant Level or Action Level by the EPA
Note:
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Reported: 07/23/08 10:15 Printed: 07/23/08 10:16

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REPORT OF ANALYSIS

July 30, 2008

Mr. Anthony Dawson
Tillahalla & Associates
P.O. Box 681921
Franklin, TN 37064

SDG Sample # : L0800810

Date Received : July 24, 2008
Description : Soilpost Fertilizer

Site ID : 4047

Sample ID : TREATED PILE 4

Project : 4047

Collected By : Bill M
Collection Date : 07/23/08 10:30

Parameter	Results	Det. Limit	Units	Limit	Method	Date/Time	By	Dil
TCLP Extraction	-				1311	7/27/08 (Mon)	ATM	1
Arsenic	ND	0.250	mg/l	5.0	6010B	07/30/08 1652	KDH	1
Lead	ND	0.50	mg/l	5.0	6010B	07/28/08 1252	KDH	1

BDL = Below Detection Limit
Det. Limit = Estimated Quantitation Limit (EQL)
Limit = Maximum Contaminant Level as established by the VA DEA
Note:
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Reported: 07/30/08 14:12 Printed: 07/30/08 14:12

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

Date Received : July [illegible], 2008
Description : Multiple Fertilizers

Sample ID : [illegible]

Collected By : [illegible]
Collection Date : [illegible]

July 30, 2008

EAS Sample # : [illegible]

Site ID : [illegible]

Project :

Parameter	Results	Det. Limit	Above Limit	Limit	Method	Date/Time	Ref. Ref.
TKN Extraction	-				351.1	07/30/08 0930	LAB 1
Arsenic	[illegible]	[illegible]	[illegible]	5.0	6010B	07/30/08 1830	LAB 1
Lead	[illegible]	[illegible]	[illegible]	5.0	6010B	07/30/08 1830	LAB 1

BDL = Below Detection Limit
Det. Limit = Estimated Quantitation Limit (EQL)
Limit = Maximum Contaminant Level as established by the EPA
Note:
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FAX (615) 758-5859

est. 1970

REPORT OF ANALYSIS

July 30,2008

Mr. Anthony Turner
Operation & Maintenance
1421 ECA (081801
Franklin, TN 37064

ESC Sample # : L# 707541

Date Received : July 28, 2008
Description : Shillport Fertilizer

Site ID : 4047

Sample ID : TREATED FILE 3

Project # : 4047

Collected By : Rob H.
Collection Date : 07/28/08 11:30

Parameters	Results	Det. Limit	Units	Limit	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	07/29/08 10:00	ZAN	1
Arsenic	.65	0.050	mg/l	5.0	6010B	07/30/08 13:45	BGK	1
Lead	.027	0.050	mg/l	5.0	6010B	07/30/08 13:47	BGK	1

MDL - Below reporting limit
PQL, Limit - Estimated Quantitation Limit(EQL)
Limit - Maximum Contaminant Level as established by the US EPA
Note:
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Reported: 07/30/08 14:00 Printed: 07/30/08 14:00

ENVIRONMENTAL
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[illegible]

REPORT OF ANALYSIS

Mrs. Anthony Ferrara
Cleveland & Associates
P.O. Box [illegible]
Franklin, TN 37064

July 28, 2004

Ref. Sample # : [illegible]

Date Received : July 20, 2004
Description : Millport Fertilizer

Site ID :

Sample ID : "EPA"

Project : Other

Collected By : Bill H.
Collection Date : [illegible]

Parameter	Result	Det. Limit	Units	Limit	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	07/24/04 1400	JPE	1
Arsenic	ND	0.050	mg/l	5.0	6010B	07/28/04 1403	LK	1
Lead	ND	0.050	mg/l	5.0	6010B	07/28/04 1403	LK	1

ND - Below Detection Limit
Det. Limit - Estimated Quantitation Limit (EQL)
Limit - Maximum TCLP Extract Level as established by the US EPA
Note:
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Reported: 07/28/04 14:43 Printed: 07/28/04 14:43

ENVIRONMENTAL
SCIENCE CORP.

2390 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
(800) 767-5859
Fax (615) 758-5859

Tax ID: 62-0814367

Est. 1970

REPORT OF ANALYSIS

July 25,2008

Mr. Tony Damiano
Swanson & Associates
1701 Pope Ferry Road Suite MS
Hiram, MS 30620

ESC Sample #: L840695-01

Date Received : July 23, 2008
Description : Gulfport Fertilizer

Site ID : 4167

Sample ID : TP-6

Project :

Submitted By : Robin
Collection Date : 07/21/08 13:00

Analyte	Result	Det. Limit	Units	Dilution	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	07/23/08 08:14	AJN	
Arsenic	<.17	0.050	mg/l	5.0	6020B	07/24/08 12:40	BAR	
Lead	<.05	0.050	mg/l	5.0	6020B	07/24/08 12:40	BAR	

MDL - Method Detection Limit
Dilution - Estimated Quantitation Limit(EQL)
Limit - Maximum Contaminant Level as established by the 40 CFR
Notes:
The reported analytical results relate only to the sample submitted.
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Reported: 07/25/08 08:14 Printed: 07/25/08 08:14

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

Date Received : [illegible]
Description : [illegible]

Sample ID : [illegible]

Collected By : [illegible]
Collection Date : [illegible]

[illegible]

Parameter	Result	Det. Limit	Units	Limit	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	[illegible]		
Arsenic	[illegible]	[illegible]	mg/l	5.0	6010B	[illegible]		
Lead	[illegible]	[illegible]	mg/l	5.0	6010B	[illegible]		

BDL - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)
Limit - Maximum Contaminant Level as established by the US EPA
Note:
The reported analytical results relate only to the sample submitted.
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Reported: [illegible] Printed: [illegible]

ORIGINAL SOIL STOCKPILE AREA

SAMPLING OF NATIVE SURFACE SOILS

BEFORE AND AFTER USAGE

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

Date Received : May [illegible], 2000
Description : Calsport Fertilizer

Sample ID : STOCKPILE AREA #1

Submitted By : Anthony Pomilio
Collection Date : 05/23/00 [illegible]

May 26, 2000

EMSI Sample # : [illegible]

Sale ID : [illegible]

Percent : [illegible]

Parameter	Result	Det. Limit	Unit	Dilut	Method	Completed	By	Qual
TCLP Extraction	-				1311	[illegible]		
Lead	ND	0.050	mg/l	5.0	6010B	[illegible]		

ND - Below Detection Limit
Det. Limit - Estimated Quantitation Limit (EQL)
Limit - Maximum Contaminant Level as established by the US EPA
Notes:
The reported analytical results relate only to the sample submitted.
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Reported: [illegible]

ENVIRONMENTAL
SCIENCE CORP.

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
(800) 767-5859
Fax (615) 758-5859

Tennessee Certification #: 02028

ORELAP ID#

REPORT OF ANALYSIS

May 16,2008

Mr. Troy Dawson
Civilution & Associates
1035 Poplo Ferry Road, Suite 8B
Hickory, NC 28602

ESC Sample # : L530631-09

Date Received : May 05, 2008
Description : Gulfport Fertilizer

Site ID : 4247

Sample ID : SOCCERFIELD AREA-5

Project # : 4247

Collected by : Anthony Dawson
Collection Date : 05/01/08 14:30

Analyte	Result	Det. Limit	Reporting Limit	Units	Method	Date/Time	By	Dil.
TCLP Extraction	-				1311	05/07/08 10:45	LSB	1
Lead	0.10	0.050	0.050	mg/l	6010B	05/13/08 20:07	DF	1

DCL - Method Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)
Limit - Maximum contaminant level as established by the US EPA
Note:
The reported analytical results relate only to the sample submitted.
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Reported: 05/16/08 16:09 Printed: 05/16/08 16:09

ENVIRONMENTAL
SCIENCE CORP.

[illegible]

REPORT OF ANALYSIS

[illegible]

PARAMETER	RESULT	DET. LIMIT	UNITS	DILUT	METHOD	DATE/TIME	BY
TCLP Extraction					1311	[illegible]	
Arsenic	BDL	0.050	mg/l	5.0	6010B	[illegible]	
Lead	0.170	0.050	mg/l	5.0	6010B	[illegible]	

BDL = Below Detection Limit
Det. Limit = Estimated Quantitation Limit (EQL)
Limit = Maximum Contaminant Level as established by the US EPA
Note:
The reported analytical results relate only to the sample submitted.
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Reported: [illegible] Issued Written: [illegible]

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22065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
(800) 767-5859
Fax (615) 758-5859

Fax all results

ext. 1570

REPORT OF ANALYSIS

July 31, 2008

Mr. Anthony Dawson
Vivendum & Associates
P.O. Box 681931
Franklin, TN 37068

ESC Sample # : [illegible]

Date Received : July 23, 2008
Description : Sulphur Fertilizer

Site ID :

Sample ID : JAS TOWN AREA WEST

Project # : 1267

Collected By : A.B.M.
Collection Date : 07/22/08 13:30

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	4.0	1.0	mg/kg	6010B	07/24/08	1
Lead	45.	0.25	mg/kg	6020B	07/25/08	1

BDL = Below Detection Limit
PQL Limit = Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.
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Reported: 07/29/08 16:15 Printed: 07/29/08 16:29

ENVIRONMENTAL
SCIENCE CORP.

2346 Sahara Dr.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-0859
Fax (615) 758-5859
Email: esc@elabs.com

REPORT OF ANALYSIS

July 30, 2008

Mr. Anthony Duncan
Creation I Associates
P.O. Box 681021
Franklin, TN 37068

ESC Sample # : L459555-01

Date Received : July 25, 2008
Description : Sculptor Fertilizer

Site ID : 4067

Sample ID : OLD LAY DUMP AREA SALT

Project # : 4067

Submitted By : M.B.H.
Collection Date : 07/24/08 12:45

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	ND	1.0	mg/kg	6010B	07/29/08	1
Lead	7.5	0.25	mg/kg	6010B	07/29/08	1

ND - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.
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Reported: 07/30/08 14:06 Printed: 07/30/08 14:07

ENVIRONMENTAL
SCIENCE CORP.

2390A Bethany Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-1859
Fax (615) 758-5859

ext. 1470

REPORT OF ANALYSIS

July 09, 2008

Mr. Anthony Damiano
Civilation & Associates
Post Box 681821
Franklin, TN 37064

Date Received : July 03, 2008
Description : Multiport Precipitator
Sample ID : LAY DOWN AREA WEST
Collected By : PAT H.
Collection Date & Time : 07/02/08 0830

SDG Complex # : LAY0716-01
Site ID :
Project # : 4047

Parameter	Result	PQL	Units	Dilution	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	07/07/08 1400	MTE	1
Arsenic	BDL	0.750	mg/l	5.0	6010B	07/08/08 1505	LK	1
Lead	BDL	0.050	mg/l	5.0	6010B	07/08/08 1505	LK	1

BDL = Below Detection Limit
Det. Limit = Estimated Quantitation Limit(EQL)
Limit = Regulated Contaminant Level as published by the US EPA
Note:
The reported analytical results relate only to the sample submitted.
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Reported: 07/09/08 16:15 Printed: 07/10/08 9:51

TREATMENT SOIL STOCKPILE AREA

SAMPLING OF NATIVE SURFACE SOILS

BEFORE AND AFTER USAGE

ENVIRONMENTAL
SCIENCE CORP.

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
(800) 767-5859
Fax (615) 758-5859
Fax ... 615-758-5859
ext. 1370

REPORT OF ANALYSIS

September 19, 2008

Mr. Anthony Damiano
Civilsonics & Associates
P.O. Box 501901
Franklin, TN 37064

ESC Sample # : L369830-02

Date Received : September 13, 2008
Description : Effluent for Oldsport Fertilizer Ground Water

Site ID :

Sample ID : OUTLET LAYDOWN EAST

Project : 0047

Collected By :
Collection Date : 09/12/08 12:30

Parameter	Result	Det. Limit	Units	Dilution	Method	Date/Time	By
TCLP Extraction	-				1311	09/18/08 0800	ATW 1
Arsenic	0.078	0.050	mg/l	1.0	6020A	09/19/08 2208	BAT 1
Lead	1.6	0.50	mg/l	5.0	6020A	09/19/08 2124	BAT 1

ND, - Below Detection Limit
Det. Limit = Reference Quantitation Limit (RQL)
Limit* - Maximum Contaminant Level as established by the US EPA
Note:
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Reported: 09/24/08 09:26 Revised: 09/24/08 09:57

ENVIRONMENTAL
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[illegible]

REPORT OF ANALYSIS

[illegible]

Date received : [illegible]
Description : [illegible]

Sample ID : SAMPLE 1 WELT

Collected By : [illegible]
Collection Date : [illegible]

[illegible]

Parameter		Result	Det. Limit	Units	Method	Date	Qual
Arsenic		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Lead		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

[illegible]

[illegible]

[illegible]

Reported: [illegible] Printed: [illegible]

ENVIRONMENTAL
SCIENCE CORP.

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tennessee Certificate

ADEM, 1978

REPORT OF ANALYSIS

September 14, 2000

Mr. Anthony Tantaro
Civilcorp & Associates
1161 Mack Hatcher
Franklin, TN 37064

ESC Sample # : L361154-01

Date Received : September 13, 2000
Description : Portable for Gulfport Fertilizer Ground Water

Site ID :

Sample ID : 2001 IN CANYON EAST

Project # : 00267

Collected By :
Collection Date : 09/13/00 10:00

Parameter	Results	Det. Limit	Units	Method	Date	Dil.
Arsenic	ND	0.05	mg/l	6010B	09/15/00	1
Lead	ND	0.05	mg/l	6010B	09/15/00	1

ND - Below Detection Limit
Det. Limit - Practical Quantitation Limit(s)
Units
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Reported: 09/18/00 09:30 Printed: 09/18/00 09:30

Page 1 of 1

ENVIRONMENTAL
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[illegible]
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tel. [illegible]

Rec'd. [illegible]

REPORT OF ANALYSIS

September 17, 2008

Mr. Tony Perkins
C'Ventures & Associates
1230 Eagle Ferry Road, Suite 30
Moyock, NC 27958

PDC Sample # : L364655-01

Date Received : September 10, 2008
Description : Pollgard Pesticides

Date ID : 9197

Sample ID : SAMPLE 1 WEST

Protect :

Collected By : Robert M.
Collection Date : 09/10/08 0900

Parameter	Result	Det. Limit	Units	Limit	Method	Date/Time	By	Ref.
TCLP Extraction	-				1311	09/12/08 1430	LAW	1
Arsenic	ND	1.000	mg/l	5.0	6010B	09/16/08 1155	LE	1
Lead	ND	.100	mg/l	5.0	6010B	09/16/08 1155	LE	1

ND - Below Detection Limit
Det. Limit - Estimated Quantitation Limit(EQL)
Limit - Maximum Contaminant Level as established by the US EPA
Notes:
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Reported: 09/17/08 10:56

BACKFILL SOIL

ENVIRONMENTAL
SCIENCE CORP.

REPORT OF ANALYSIS

Mrs. Anthony Tarsem
Evaluation & Associates
P.O. Box [illegible]
Stockton, TX [illegible]

Date Received : July [illegible], 20[illegible]
Description : Chicken Fertilizer

Sample ID : SATELITE DIRT

Collected By : A.D.H.
Collection Date : 07/25/[illegible] 14:00

Date Sample # : [illegible]

Date ID : 4147

Project # : 4147

PARAMETER	Result	Det. Limit	Total Units	Limit	Method	Date/Time	By	Qual
TCLP Extraction	-				1311	07/29/08 [illegible]	A/M	
Arsenic	ND	0.050	mg/l	5.0	6010B	07/31/08 21:01	BAR	
Lead	ND	0.050	mg/l	5.0	6010B	07/31/08 21:01	BAR	

ND = Below Detectable Level
Det. Limit = Estimated Quantitation Limit(EQL)
Limit = Maximum Contaminant Level as established by the US EPA
Notes:
The reported analytical results relate only to the sample submitted.
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Reported: 07/30/08 [illegible] Printed: 07/30/08 [illegible]

ENVIRONMENTAL
SCIENCE CORP.

2200 Saltsburg Rd.
Ste. Suites, PA 15237
(412) 963-1454
(800) 367-6944
Fax (412) 963-9554

Tax exp. 6/30/2010

est. 1970

REPORT OF ANALYSIS

July 24,2008

Mr. Anthony Tarsano
Civilcon & Associates
P.O. Box 68101
Franklin, TN 37064

ESC Sample # : L[illegible]

Date Received : July 24, 2008
Description : Coalport Fertilizer

Site ID : 4040

Sample ID : BACKFILL DIRT

Project # : 4040

Collected by :
Collection Date : 07/24/08 [illegible]

Parameter	Results	Det. Limit	Units	Method	Date	Dil.
Arsenic	1.2	1.0	mg/kg	6010B	07/28/08	1
Lead	7.4	1.0	mg/kg	6010B	07/28/08	1

BDL = Below Detection Limit
Det. Limit = Reportable Quantitation Limit(RQL)
Dil. = Dilution
The reported analytical results relate only to the sample submitted.
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Reported: 07/30/08 14:13 Approved: 07/30/08 [illegible]

APPENDIX E

TALLEY

OF

TREATED AND UNTREATED SOILS

EXCAVATED AND DISPOSED OF AT LANDFILL

Covington & Associates
Gulfport, MS
RSI Project No. 20837
Treated Non-Hazardous Soil Removal
Hauled by KAB Enterprises and Taken to WM-Pecan Grove Landfill-Pass Christian, MS

Date	Load No.	Truck #	Stockpile #	Manifest #	WM Scale Ticket #	Gross Weight	Tare Weight	Net Weight	Net Tons	TOTAL BY DATE
9/8/08	1	59	7	001T	780254	84,220	33,420	50,800	25.40	
9/8/08	2	69	7T	002T	780255	83,600	33,460	50,140	25.07	
9/8/08	3	007	7T	003T	780257	77,340	33,380	43,960	21.98	
9/8/08	4	53	7T	004T	780262	53,880	23,680	30,200	15.10	
9/8/08	5	59	7T	005T	780268	84,320	33,420	50,900	25.45	
9/8/08	6	69	7T	006T	780270	85,860	33,460	52,400	26.20	
9/8/08	7	007	7	007T	780271	73,040	33,380	39,660	19.83	159.03
9/9/08	8	53	5	008T	780299	49,760	23,680	26,080	13.04	
9/9/08	9	69	5	009T	780304	83,960	33,460	50,500	25.25	
9/9/08	10	59	5	010T	780305	88,220	33,420	54,800	27.40	
9/9/08	11	007	5	011T	780306	84,740	33,380	51,360	25.68	
9/9/08	12	53	5	012T	780310	52,000	23,680	28,320	14.16	
9/9/08	13	69	5	013T	780314	79,160	33,460	45,700	22.85	
9/9/08	14	59	5	014T	780318	80,320	33,420	46,900	23.45	
9/9/08	15	007	10	015T	780322	81,600	33,380	48,220	24.11	
9/9/08	16	53	10	016T	780330	50,740	23,680	27,060	13.53	
9/9/08	17	69	10	017T	780333	77,800	33,460	44,340	22.17	
9/9/08	18	59	10	018T	780336	78,060	33,420	44,640	22.32	
9/9/08	19	007	10	019T	780342	76,960	33,380	43,580	21.79	
9/9/08	20	53	10	020T	780347	48,080	23,680	24,400	12.20	
9/9/08	21	69	10	021T	780349	87,520	33,460	54,060	27.03	
9/9/08	22	59	3	022T	780353	89,320	33,420	55,900	27.95	
9/9/08	23	007	3	023T	780359	86,720	33,380	53,340	26.67	
9/9/08	24	53	3	024T	780360	52,680	23,680	29,000	14.50	
9/9/08	25	69	3	025T	780361	87,140	33,460	53,680	26.84	
9/9/08	26	59	3	026T	780363	90,980	33,420	57,560	28.78	
9/9/08	27	007	7	027T	780369	81,880	33,380	48,500	24.25	
9/9/08	28	53	3	028T	780372	51,800	23,680	28,120	14.06	
9/9/08	29	69	3	029T	777670	86,140	33,460	52,680	26.34	
9/9/08	30	59	4	030T	780381	89,820	33,420	56,400	28.20	512.57
9/10/08	31	007	4	031T	780109	90,280	33,380	56,900	28.45	
9/10/08	32	53	4	032T	780385	51,000	23,680	27,320	13.66	
9/10/08	33	59	4	033T	780411	90,980	33,420	57,560	28.78	
9/10/08	34	53	4	034T	780417	53,180	23,680	29,500	14.75	
9/10/08	35	007	4	035T	780424	90,620	33,380	57,240	28.62	
9/10/08	36	59	4	036T	780426	91,580	33,420	58,160	29.08	
9/10/08	37	53	6	037T	780442	55,880	23,680	32,200	16.10	
9/10/08	38	007	6	038T	780448	97,420	33,380	64,040	32.02	
9/10/08	39	59	6	039T	780453	98,720	33,420	65,300	32.65	
9/10/08	40	53	6	040T	780473	60,280	23,680	36,600	18.30	
9/10/08	41	007	6	041T	780484	101,220	33,380	67,840	33.92	
9/10/08	42	59	6	042T	780491	100,660	33,420	67,240	33.62	
9/10/08	43	007	8	043T	780527	95,300	33,380	61,920	30.96	
9/10/08	44	53	8	044T	780531	58,060	23,680	34,380	17.19	
9/10/08	45	59	8	045T	780537	91,980	33,420	61,560	30.78	
9/10/08	46	44	8	046T	780559	94,160	34,080	60,080	30.04	
9/10/08	47	007	8	047T	780563	96,380	33,380	63,000	31.50	
9/10/08	48	59	8	048T	780572	91,540	33,420	58,120	29.06	
9/10/08	49	53	8	049T	780570	57,600	23,680	33,920	16.96	496.44
									TOTAL TONS	1,168.04

Covington & Associates
Gulfport, MS
RSI Project No. 20837
Non Treated Non-Hazardous Soil Removal
Hauled by KAB Enterprises and Taken to WM-Pecan Grove Landfill, Pass Christian, MS

Date	Load No.	Truck #	Stockpile #	Manifest #	WM Scale Ticket #	Gross Weight	Tare Weight	Net Weight	Net Tons	TOTAL BY DATE
9/8/08	1	69	9	001NH	780226	82,140	33,460	48,680	24.34	
9/8/08	2	59	9	002NH	780230	89,180	33,420	55,760	27.88	
9/8/08	3	53	9	003NH	780235	49,080	23,680	26,300	13.15	
9/8/08	4	007	1	004NH	780236	79,140	33,380	45,760	22.88	
9/8/08	5	69	2	005NH	780237	84,800	33,460	51,340	25.67	
9/8/08	6			006NH	VOID / DID NOT USE					113.92
9/10/08	7	44	2	007NH	780206	63,520	34,080	29,440	29.72	
9/10/08	8	007	2	008NH	780600	90,460	33,380	66,080	33.04	
9/10/08	9	53	2	009NH	780605	56,320	23,680	32,640	16.32	
9/10/08	10	59	1	010NH	780610	92,440	33,420	59,020	29.51	
9/10/08	11	44	1	011NH	781554	63,720	34,080	29,640	29.82	
9/10/08	12	007	1	012NH	780634	97,340	33,380	63,960	31.98	
9/10/08	13	53	1	013NH	780639	56,920	23,680	33,240	16.62	
9/10/08	14	59	1	014NH	780096	96,800	33,420	63,380	31.69	218.70
								TOTAL TONS		332.62

APPENDIX F

ANALYTICAL

CHAIN OF CUSTODY FORMS

Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information:

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport MS
Phone: 228-396-0486
FAX: 228-864-2402
Client Project #:
ESC Key:
Collected by: Anthony DAmiano
Site/Facility ID#: 9397
P.O.#:
Collected by (signature): Anthony P. Damiano
Immediately Packed on Ice: N Y

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day 100%
___ Two Day 50%
___ Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes

Analysis/Container/Preservative: 24 hour Total Lead (P6)

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

CoCode (lab use only)
Template/Prelogin
Shipped Via:

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	# of Cntrs	Remarks/Contaminant	Sample # (lab only)
Area 2 Bottom North	Comp	SS	12'					1546612-21
Area 2 " South	"	SS	12'					-22
" " middle	"	"	12					-23
" Island North	"	"						-24
" " South	"	"						-25
" " EAST	"	"						-26
" " West	"	"						-27

*Matrix SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

pH _____ Temp _____

Remarks: 9632 6247 0467

Flow _____ Other _____

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: ☐ UPS ☐ FedEx ☐ Courier ☐ _____	Condition (lab use only)
Anthony P. Damiano	5/22/08	5:30			
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: 4.4°C / Bottles Received: 7 bag	CoC Seals Intact: ___ Y ___ N X NA
Relinquished by (Signature)	Date	Time	Received for lab by: (Signature)	Date: 5/23/08 / Time: 0900	pH Checked: / NCF:
			Josh Belcher		

Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport MS
Phone: 228-396-0486
FAX:
Client Project #
ESC Key
Collected by
Site/Facility ID#: 9397
P.O.#
Collected by (signature)

Rush? (Lab MUST Be Notified) — Same Day 200% / Next Day 100% / Two Day 50% / Three Day 25%
Date Results Needed:
Email? No/Yes
FAX? No/Yes

Analysis/Container/Preservative

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	TCLP lead	pH	Total lead	Remarks/Container #	Sample # (lab only)
soil stockpile #1	comp	soil		5/29/08		2	X	X		L347763-01	
" " #2	"	"		"		1	X			02	
soil stockpile #4	"	"		"		1		X		04	
Area 2 - second pass Bottom middle	"	"		"					X	05	
Area 2 - " " - Sidewall East	"	"		"					X	06	
" - " "	"	West		"					X	07	
" - " "	"	North		"					X	08	
" - " "	"	South		"					X	09	

*Matrix: SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

Remarks: 8550 0944 8777

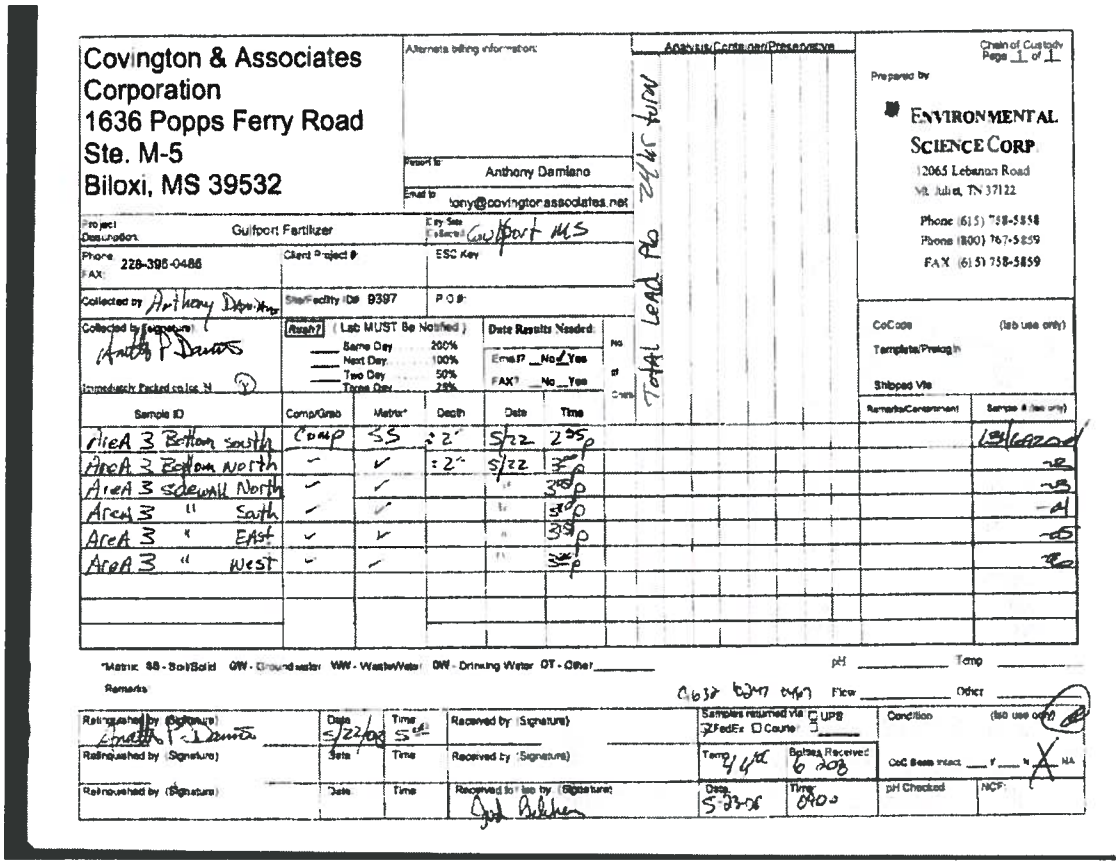
Relinquished by (Signature): Anthony P. Damiano — Date: 5/29/08 — Time:
Received by (Signature):
Relinquished by (Signature): — Date: — Time:
Received by (Signature):
Relinquished by (Signature): — Date: — Time:
Received for lab by (Signature): Tracy Pendorf — Date: 5-30-08 — Time: 0900

Samples returned via: UPS / FedEx / Courier
Tracking #: 1
Bottles Received: 7-2oz/2-8oz
Condition: OK (lab use only)
COC Seals Intact: ___ Y ___ N ___ NA
pH Checked:
NCF:

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859
3

CoCode (lab use only)
Template/Prelogin
Shipped Via:
pH _____ Temp _____
Flow _____ Other _____



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information:

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
Key Site Collected: Gulfport MS
Phone: 228-396-0486
FAX:
Client Project #:
ESC Key:
Collected by: Anthony Damiano
Site/Facility ID#: 9397
P.O.#:
Collected by (signature):
Immediately Packed on Ice: N (Y)

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day 100%
___ Two Day 50%
___ Three Day 25%
Date Results Needed:
Email? __No __Yes
FAX? __No __Yes
No. of Cntrs:

Analysis/Container/Preservative
Total Lead 24hr turn

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

CoCode: (lab use only)
Template/Prelogin:
Shipped Via:

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Remarks/Containment	Sample # (lab only)
AreA 3 Bottom South	Comp	SS	:2"	5/22	235p		1814622001
AreA 3 Bottom North	"	"	:2"	5/22	330p		-02
AreA 3 Sidewall North	"	"		"	330p		-03
AreA 3 " South	"	"		"	330p		-04
AreA 3 " East	"	"		"	330p		-05
AreA 3 " West	"	"		"	330p		-06

*Matrix: SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

pH: Temp:
Flow: Other:

Remarks: 0638 6247 6467

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: ☒ FedEx ☐ Courier / UPS	Condition (lab use only)
Anthony Damiano	5/22/08	5:45		Tracking # 5	
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: 4/4C Bottles Received: 6 208	COC Seals Intact: ___ Y ___ N X NA
Relinquished by (Signature)	Date	Time	Received for lab by (Signature):	Date: 5-23-08 Time: 0800	pH Checked: NCF:

Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport, MS
Phone: 228-388-0488
FAX: Ref 228 861-2402
Client Project #
ESC Key
Collected by (print): Anthony Damiano
Site/Facility ID#: 9397
P.O.#
Collected by (signature):
Immediately Packed on Ice: N (Y)

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day 100%
___ Two Day 50%
___ Three Day 25%
Date Results Needed:
Email? _No _Yes
FAX? _No _Yes
No. of Cntrs

Analysis/Container/Preservative
24hr
Total Lead (Pb)
Sclay

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

CoCode (lab use only)
Template/Prelogin
Shipped Via:

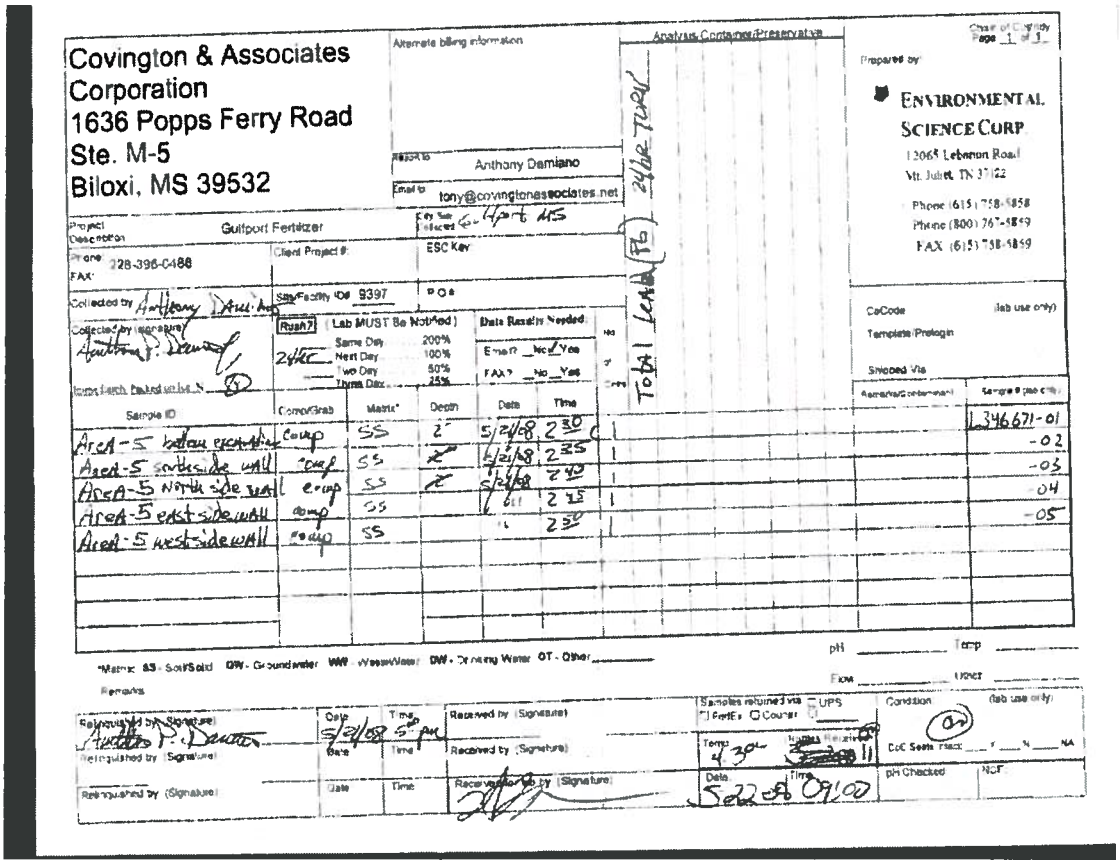
Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Remarks/Container #	Sample # (lab only)
Area-8-bottom excavat	comp	SS		5/21/08	3pm	X	1346671-06
Area-8-west wall	"	SS		5/21/08	"	X	-07
Area-8 south wall	"	SS		5/21/08	"	X	-08
Area-8 north wall	"	SS		5/21/08	"	X	-09
Stockpile soil #1 (Area 5)	"	SS		5/21/08	4pm	X	-10
Stockpile soil #2 (Area 8)	"	SS		5/21/08	4pm	X	-11

*Matrix: SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

pH _____ Temp _____
Flow _____ Other _____

Remarks

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: FedEx Courier UPS	Condition: (lab use only)
Anthony Damiano	5/21/08	5pm			(OK)
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: 4.5 Bottles Received: 11	COC Seals Intact: ___Y ___N ___NA
Relinquished by (Signature)	Date	Time	Received for lab by (Signature)	Date: 5-22-08 Time: 09:00	pH Checked / NCF



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Attn to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State collected: Gulfport MS
Phone: 228-396-0486
Client Project #:
ESC Key
FAX:
Site/Facility ID#: 9397
P.O.#
Collected by (Signature):
Rush? (Lab MUST Be Notified): Same Day 200%, Next Day 100%, Two Day 50%, Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes
Quote #:
Analysis/Container/Preservative
Chain of Custody Page 1 of 1

Prepared by:
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12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

CoCode (lab use only)
Template/Prelogin
Shipped Via
Remarks/Contaminant
Sample # (lab only)

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Sample # (lab only)
Area-5 bottom excavation	Comp	SS	2'	5/21/08	2:30	L346671-01
Area-5 southside wall	comp	SS	2'	5/21/08	2:35	-02
Area-5 North side wall	comp	SS	2'	5/21/08	2:40	-03
Area-5 east side wall	comp	SS		5/21/08	2:25	-04
Area-5 west side wall	comp	SS		5/21/08	2:30	-05

*Matrix: SS - Soil/Solid GW - Groundwater WW - Wastewater DW - Drinking Water OT - Other

pH Temp
Flow Other

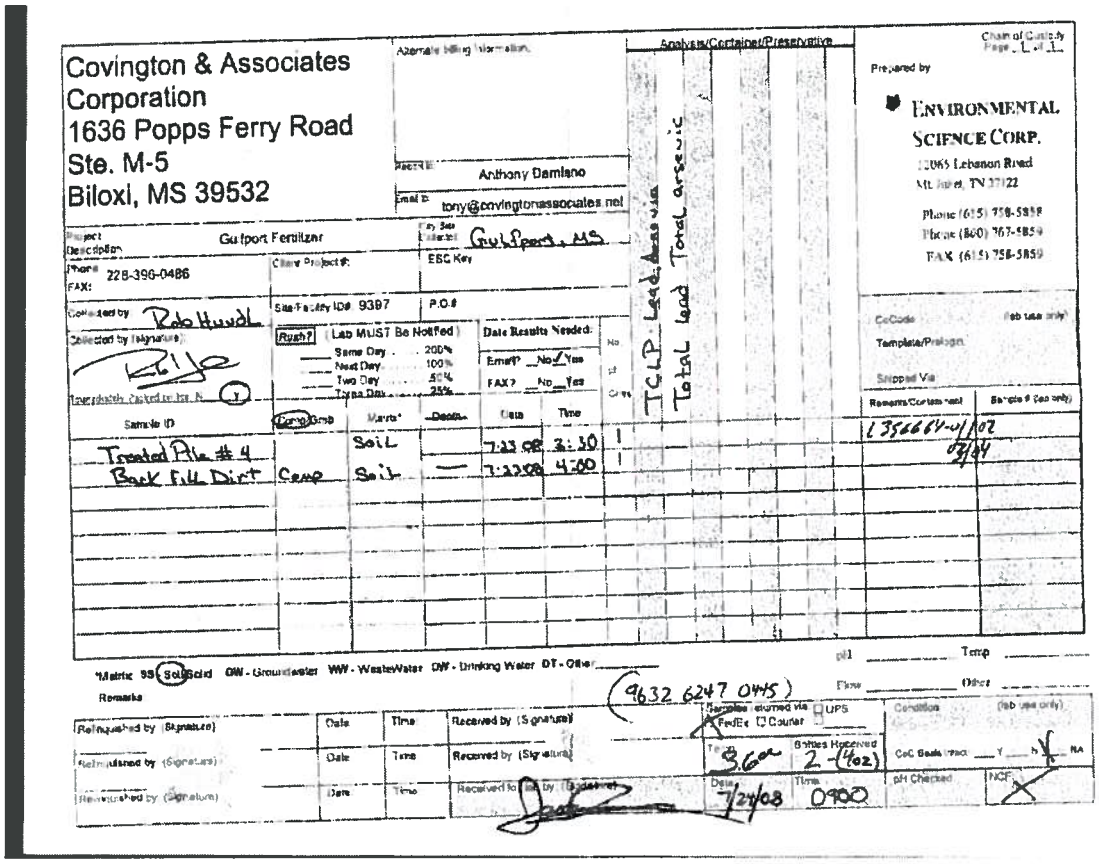
Remarks

Relinquished by (Signature)	Date	Time	Received by (Signature)
	5/21/08	5:00 pm	
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)

Samples returned via: FedEx Courier UPS
Temp: 4.3°
Bottles Received:
Date: 5/22/08 Time: 0900

Condition: (lab use only) OK
COC Seals Intact: Y N NA
pH Checked
NCF

To bill Lenard (FL) 24hr TAT



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information:

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City Site Located: Gulfport, MS
Phone: 228-396-0486 FAX:
Client Project #:
ESC Key
Collected by: Rob Hurdle
Site Facility ID#: 9397
P.O.#
Collected by (signature):
Immediately Packed on Ice: N Y
Rush? (Lab MUST Be Notified) Same Day 200% Next Day 100% Two Day 50% Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes
No. of Cntrs

Analysis/Container/Preservative: TCLP Lead, Arsenic; Total Lead, Arsenic

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

CoCode (lab use only)
Template/Prelogin
Shipped Via:

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Remarks/Container #	Sample # (lab only)
Treated Pile #4		Soil		7-23-08	3:30	L356664-01	
Back Fill Dirt	Comp	Soil		7-23-08	4:00	02	

*Matrix: SS Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

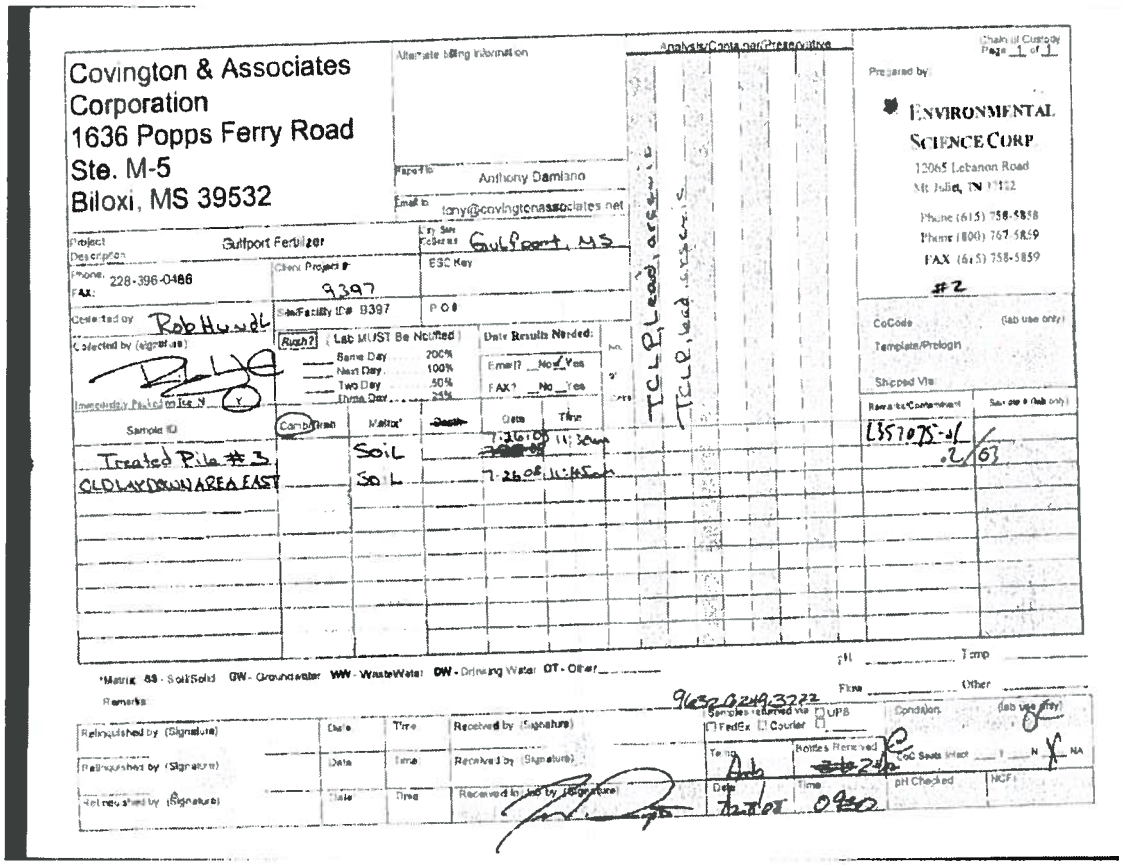
pH _____ Temp _____
Flow _____ Other _____

Remarks: (9632 6247 0445)

Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received for lab by (Signature)

Samples returned via: FedEx Courier UPS
Tracking #
Temp 3.6°C
Bottles Received 2 (402)
Date 7/24/08 Time 0900

Condition (lab use only)
CoC Seals Intact: Y N NA
pH Checked
NCF X



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Analysis/Container/Preservative

Chain of Custody
Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

#2

Report To: Anthony Damiano
Email To: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City Site Address: Gulfport, MS
Phone: 228-396-0486
FAX:
Client Project #: 9397
ESC Key:
Site/Facility ID#: B397
P.O.#:
Quoted by: Rob Hundl
Collected by (signature):
Immediately Packed on Ice N Y
Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes
No.
of
Cntrs

TCLP, Lead, arsenic
TCLP, Lead, arsenic

CoCode (lab use only)
Template/Prelogin
Shipped Via
Remarks/Contaminant
Sample # (lab only)
E557075-01
2163

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time
Treated Pile #3		Soil		7-26-05	11:30am
OLD LAYDOWN AREA EAST		Soil		7-26-05	11:45am

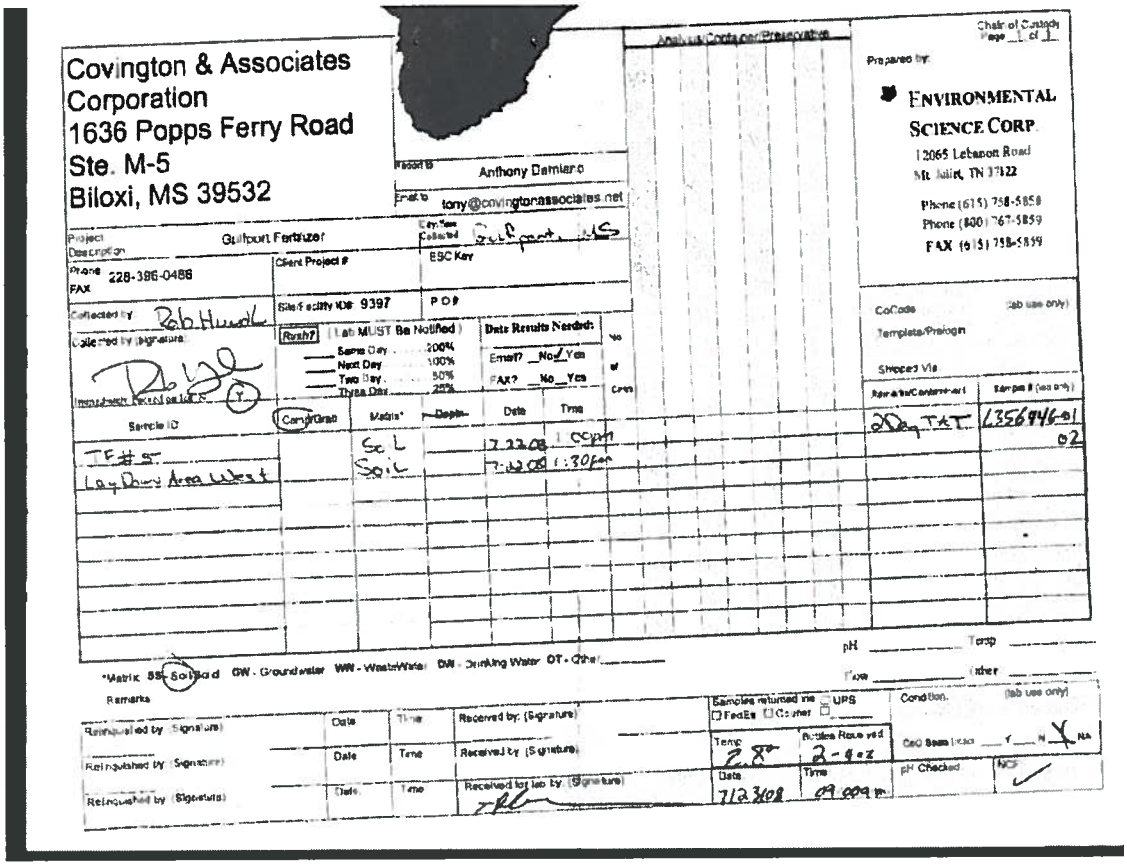
*Matrix: SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

pH _____ Temp _____
Flow _____ Other _____

Remarks: 9632 0249 3222

Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)

Samples returned via: UPS FedEx Courier
Tracking #
Condition: (lab use only)
Bottles Received: 24
COC Seals Intact: Y N NA
Date: 7-27-05
Time: 0930
pH Checked
NCF



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Chain of Custody
Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport, MS
Phone: 228-396-0486
Client Project #
ESC Key
FAX
Site/Facility ID#: 9397
P.O.#
Collected by: Bob Hurst
Collected by (signature):
Immediately Packed on Ice N Y
Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes
No. of Cntrs

Analysis/Container/Preservative

CoCode (lab use only)
Template/Prelogin
Shipped Via:
Remarks/Container #
Sample # (lab only)

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time		
TF #5 Lay Down Area West		Sol Soil		7.22.08	1:00pm	2 Day TAT	L356946-01
				7.22.08	1:30pm		02

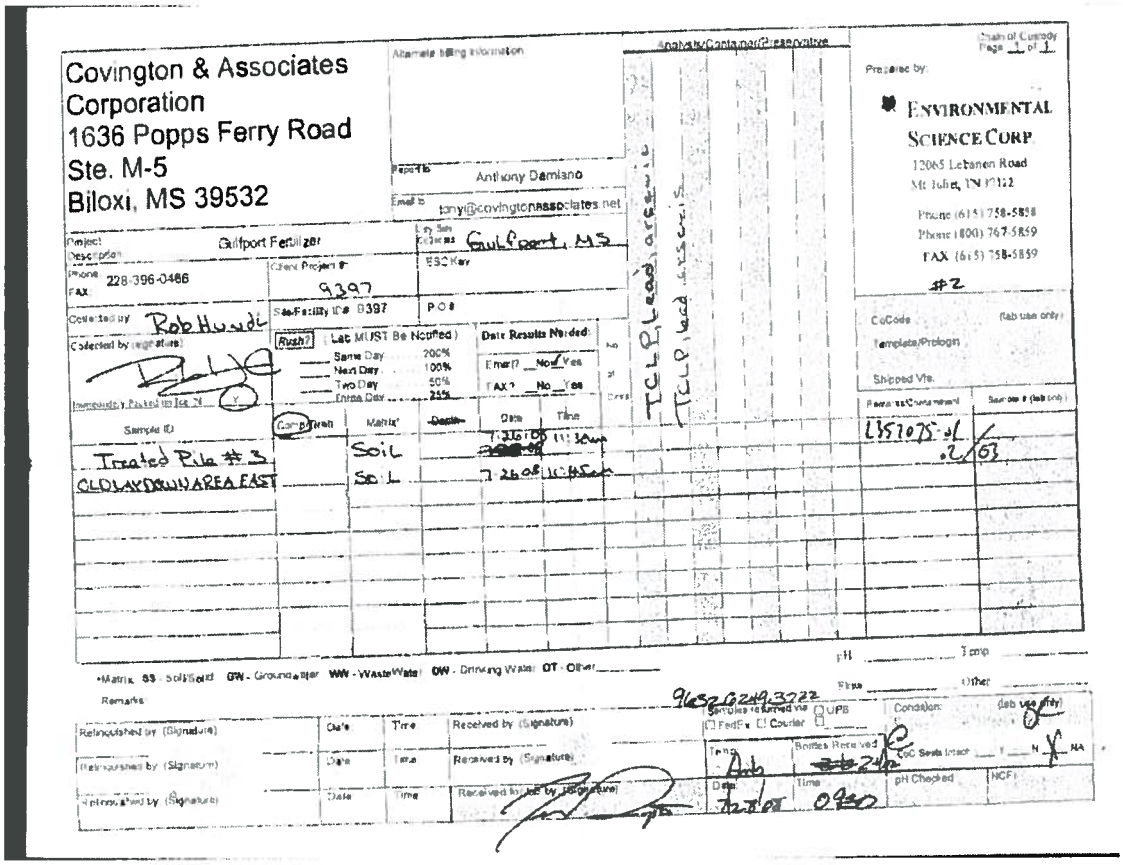
*Matrix: SS - Soil/Sed GW - Groundwater WW - Wastewater DW - Drinking Water OT - Other

pH _____ Temp _____
Flow _____ Other _____

Remarks

	Date	Time			
Relinquished by: (Signature)			Received by: (Signature)	Samples returned via: UPS FedEx Courier	Condition: (lab use only)
Relinquished by: (Signature)			Received by: (Signature)	Temp: 2.8°	Bottles Received: 2-40z
Relinquished by: (Signature)			Received for lab by: (Signature)	Date: 7/23/08	Time: 09:00

COC Seal Present: Y N NA
pH Checked
NCF: ✓



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Attention: Anthony Damiano
Email: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
Phone: 228-396-0466
FAX:
Client Project #: 9397
Site/Facility ID#: 9397
P.O.#:
Collected by: Rob Hundt
Collected by (signature):
Immediately Packed on Ice: Y
Rush? (Lab MUST Be Notified): Same Day 200%, Next Day 100%, Two Day 50%, Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes
Sample ID | Comp/Grab | Matrix* | Depth | Date | Time
Treated Pile #3 | | Soil | | | 11:30am
OLD LAYDOWN AREA EAST | | Soil | | | 11:45am

Analysis/Container/Preservative: TCLP Lead, arsenic; TCLP lead, arsenic

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

#2

COCode: (lab use only)
Template/Prelogin:
Shipped Via:
Remarks/Container#: L857075 #1, #2, #3
Sample # (lab only)

*Matrix: SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

pH: Temp:
Flow: Other:

Remarks:

Relinquished by (Signature) | Date | Time | Received by (Signature)
Relinquished by (Signature) | Date | Time | Received by (Signature)
Relinquished by (Signature) | Date | Time | Received by (Signature)

Samples returned via: UPS FedEx Courier
Tracking #: 9632 0249 3722
Bottles Received: 2
Condition: (lab use only)
COC Seals Intact: Y N NA
Date: 7-26-08 Time: 0930
pH Checked: NCF:

ENVIRONMENTAL SCIENCE CORP.

SAMPLE NON-CONFORMANCE FORM

Sample No.: L358446 228-861-2402

Date: 7/23/08

Evaluated by: JLP

Client: COVASSOC

Non-Conformance (check applicable items)

____	Chain of Custody is missing	✓	Login Clarification Needed
____	Improper container type	____	Improper preservation
____	Chain of custody is incomplete	____	Container lid not in tact
____	Parameter(s) past holding time	____	Improper temperature
____	Broken container(s) **see below**	____	Broken container: sufficient sample volume remains for analysis requested

____ Insufficient packing material around container

____ Insufficient packing material inside cooler

____ Improper handling by carrier (Fedex / UPS / Courier)

____ Sample was frozen

Comments: What analysis?

Login Instructions:

ESR Initials: JL

Client informed by (call) / email / fax / voice mail date: 7/23/08 time: 1115

Client contact: TCLP As 1186

CAPP

ENVIRONMENTAL SCIENCE CORP.

SAMPLE NON-CONFORMANCE FORM

Sample No.: L356664

Date: 7/24/08

Evaluated by: ROMER

Client: COVASSOC

Non-Conformance (check applicable items)

____	Chain of Custody is missing	✓	Login Clarification Needed
____	Improper container type	____	Improper preservation
____	Chain of custody is incomplete	____	Container lid not in tact
____	Parameter(s) past holding time	____	Improper temperature
____	Broken container(s) **see below**	____	Broken container: sufficient sample volume remains for analysis requested

____ Insufficient packing material around container

____ Insufficient packing material inside cooler

____ Improper handling by carrier (FedEx / UPS / Courier)

____ Sample was frozen

Comments: ANALYSIS LISTED ON COC, BUT NOT MARKED FOR EACH SAMPLE.

(RUN WHICH TESTS FOR WHICH SAMPLES?)

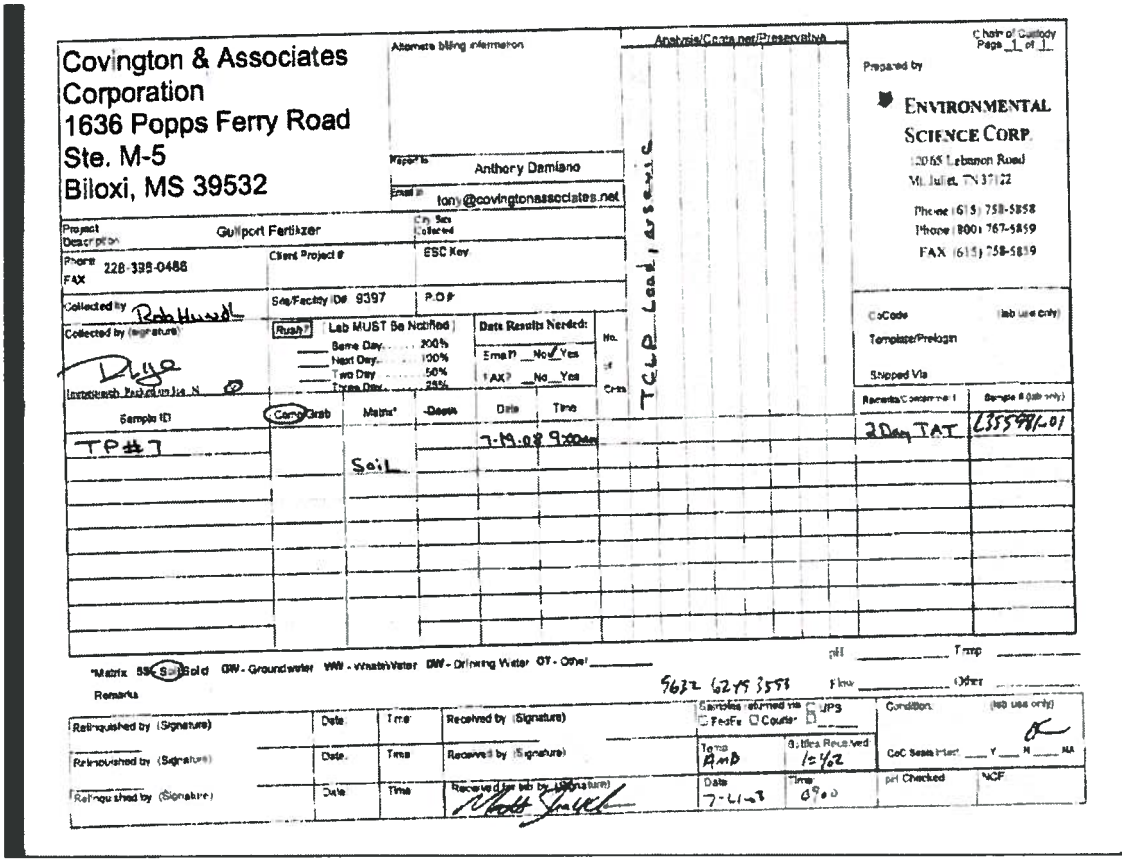
Login Instructions:

TSR Initials: JC

Client informed by call / email / fax / voice mail date: 7/24/08 time: ____

Client contact:

Run both test



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City Site Collected:
Phone: 228-388-0486
FAX:
Client Project #
ESC Key:
Collected by: Rob Hurst
Collected by (signature):
Site/Facility ID# 9397
P.O.#
Rush? Lab MUST Be Notified
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes
No. of Cntrs:

Analysis/Container/Preservative: TCLP Lead, Arsenic

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

CoCode (lab use only)
Template/Prelogin
Shipped Via
Remarks/Comments
Sample # (lab only)

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Remarks/Comments	Sample # (lab only)
TP#7		Soil		7-14-08	9:00am	2Day TAT	L355991-01

*Matrix: SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

pH _____ Temp _____

Remarks: 9632 6295 3558

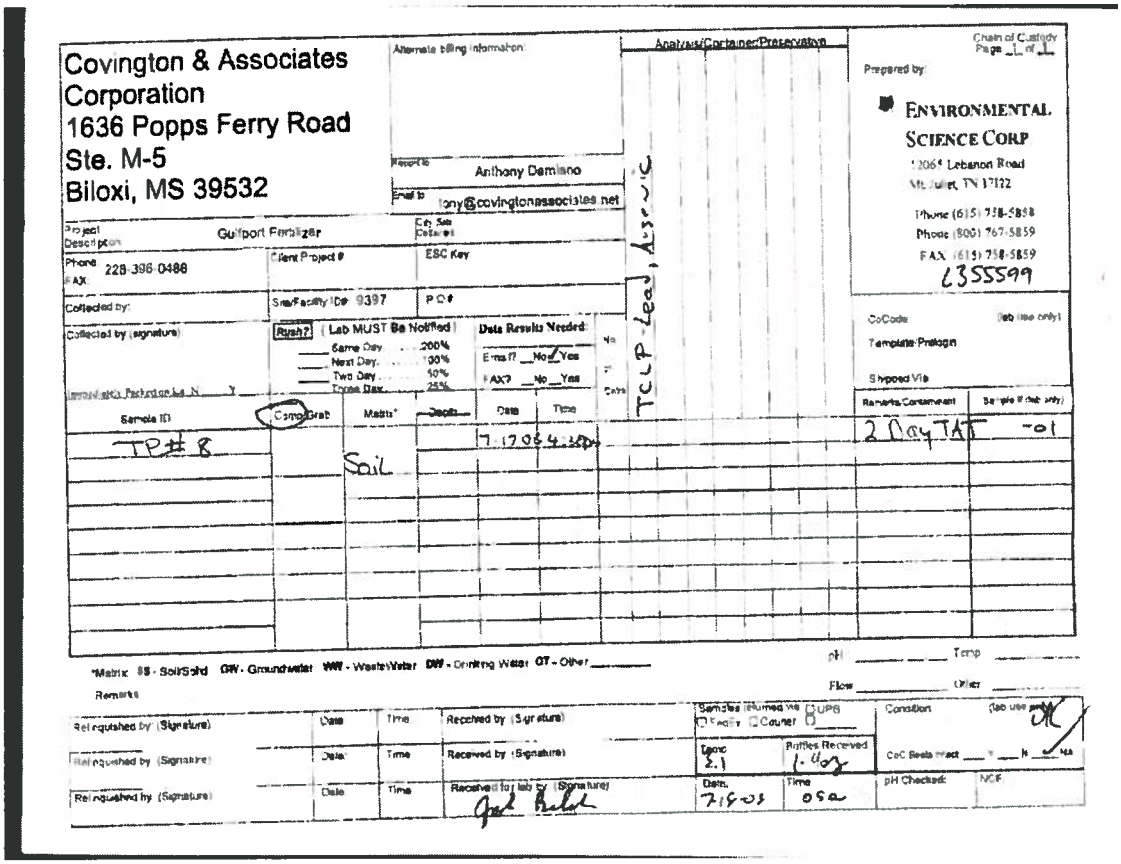
Flow _____ Other _____

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: UPS / FedEx / Courier	Condition (lab use only)
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: AMB	Bottles Received: 1 of 2
Relinquished by (Signature)	Date	Time	Received for lab by (Signature)	Date: 7-15-08	Time: 0900

COC Seals Intact: ___ Y ___ N ___ NA

pH Checked

%OF



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information:

Report to: Anthony Demiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City Site Detected:
Phone # AX: 228-396-0488
Client Project #:
ESC Key:
Collected by:
Site/Facility ID#: 9397
P.O.#:
Collected by (signature):
Rush? (Lab MUST Be Notified)
___ Same Day ... 200%
___ Next Day ... 100%
___ Two Day ... 50%
___ Three Day ... 25%
Data Results Needed:
Email? __No __Yes
FAX? __No __Yes
No. of Days:

Analysis/Container/Preservation: TCLP-Lead, Arsenic

Chain of Custody
Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859
6355599

CoCode: (lab use only)
Template/Prelogin:
Shipped Via:

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Remarks/Container#	Sample # (lab only)
TP#8		Soil		7.17.06	4:30	2 Day TAT	-01

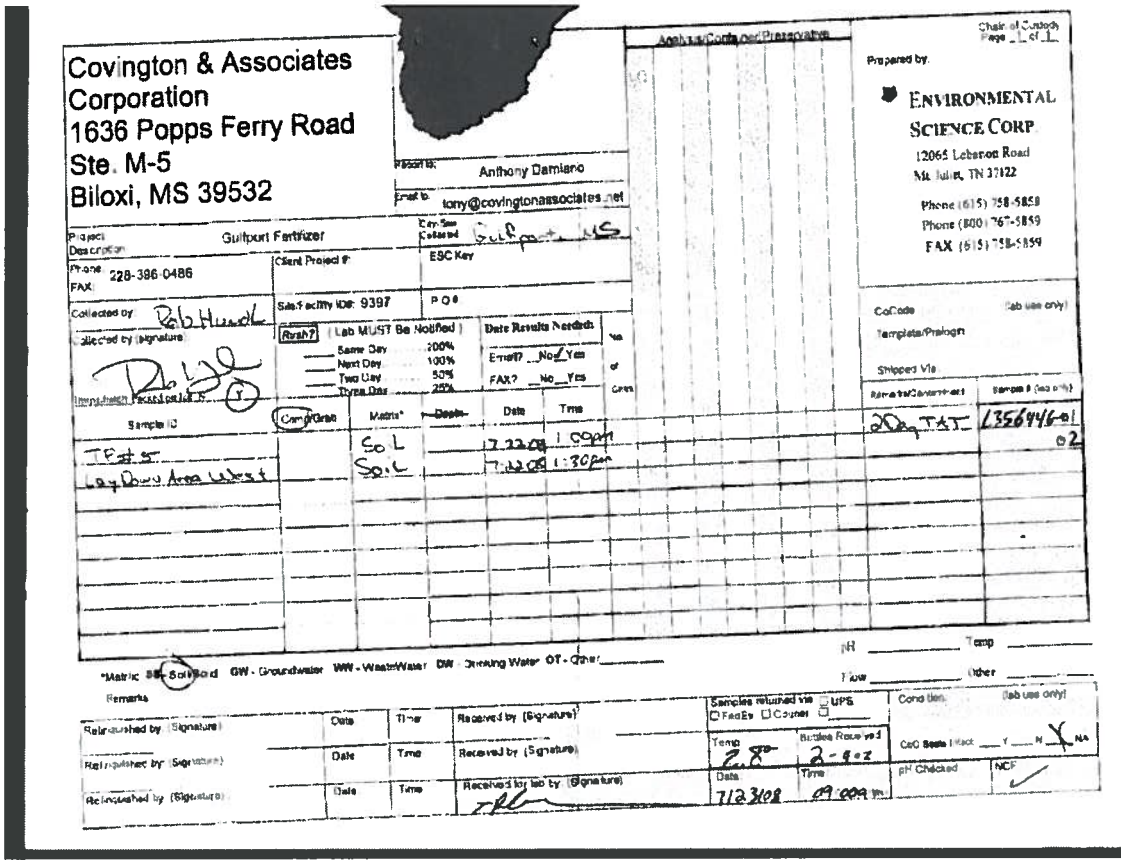
*Matrix: SS - Soil/Solid GW - Groundwater WW - Wastewater DW - Drinking Water OT - Other

pH _____ Temp _____
Flow _____ Other _____

Remarks:

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: ☐ Fedex ☐ Courier ☐ UPS	Condition: OK
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: 2.1	Bottles Received: 1 4oz
Relinquished by (Signature)	Date	Time	Received for lab by (Signature): Jack Hall	Date: 7.19.06	Time: 0830

COC Seals Intact: ___ Y ___ N ___ NA
pH Checked: NCF:



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport, MS
Phone: 228-396-0486
FAX:
Client Project #:
ESC Key:
Site/Facility ID#: 9397
P.O.#:
Collected by: Rob Hurst
Collected by (signature):
Immediately Packed on Ice: Y (N)

Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes
No. of Cntrs

Analysis/Container/Preservative

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

CoCode: (lab use only)
Template/Prelogin:
Shipped Via:

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Remarks/Container #	Sample # (lab only)
TP#5		Soil		7.22.09	1:00pm	20 Day TAT	L356946-01
Lay Down Area West		Soil		7.22.09	1:30pm		02

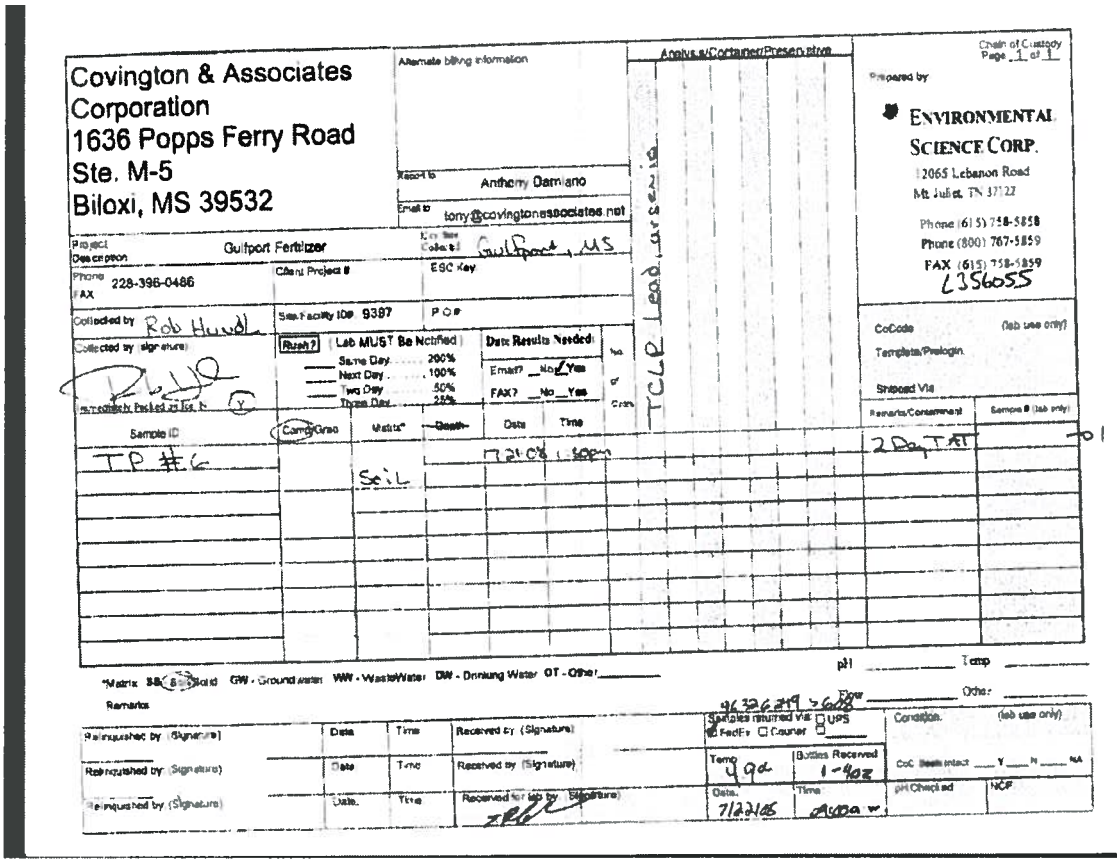
*Matrix: SS - Soil/Solid GW - Groundwater WW - Wastewater DW - Drinking Water OT - Other

pH _____ Temp _____
Flow _____ Other _____

Remarks:

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: FedEx Courier UPS	Condition: (lab use only)
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: 2.8°	Bottles Received: 2-9oz
Relinquished by (Signature)	Date	Time	Received for lab by (Signature):	Date: 7/23/09	Time: 09:00

COC Seal Intact: ___ Y ___ N X NA
pH Checked:
NCF: ✓



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City State Collected: Gulfport, MS
Phone: 228-396-0486
Client Project #
ESC Key
FAX
Collected by: Rob Hurdle
Collected by (signature)
Site/Facility ID#: 9387
P.O.#
Rush? (Lab MUST Be Notified) Same Day 200% Next Day 100% Two Day 50% Three Day 25%
Date Results Needed
Email? No Yes
FAX? No Yes
No. of Cntrs

Analysis/Container/Preservative: TCLP Lead, Arsenic

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859
L356055

CoCode (lab use only)
Template/Prelogin
Shipped Via
Remarks/Contaminant
Sample # (lab only)

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time			
TP #6		Soil		7/21/05	1:50pm		2 Day TAT	01

*Matrix: SS - Soil GW - Ground water WW - WasteWater DW - Drinking Water OT - Other

pH _____ Temp _____
Flow _____ Other _____

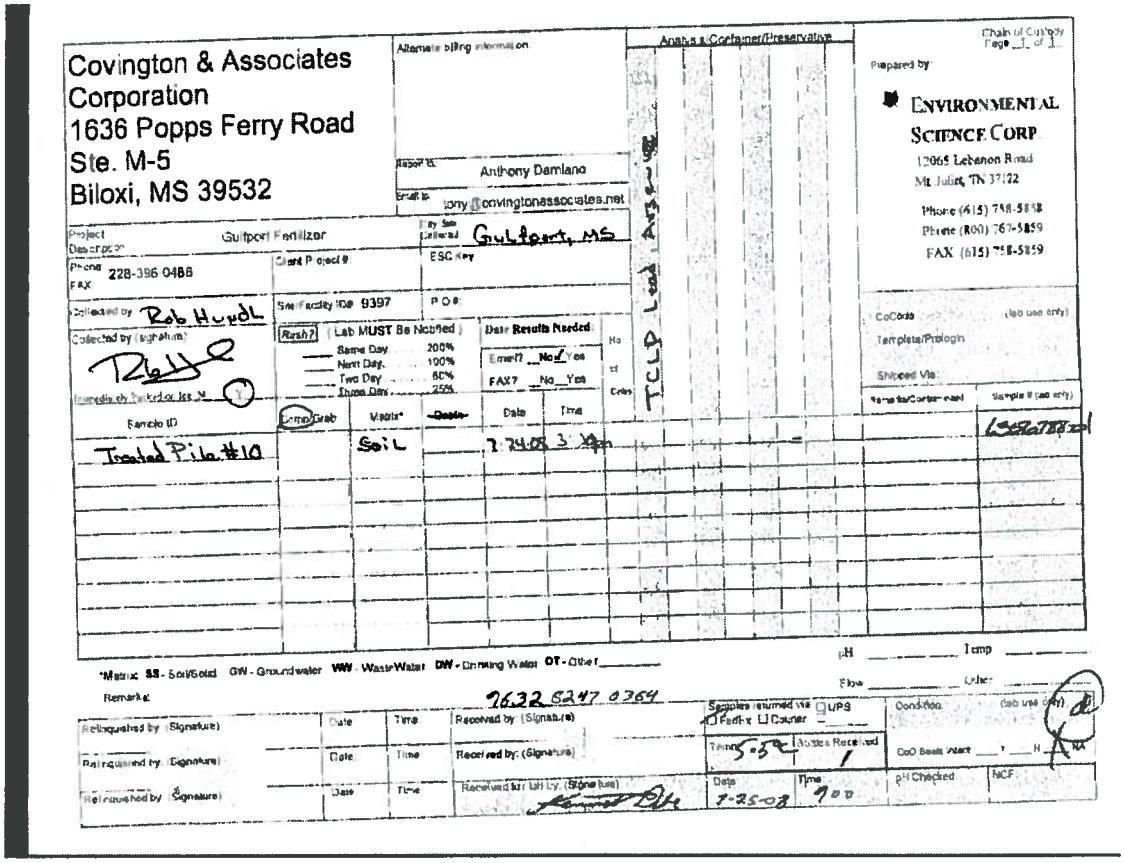
Remarks

96336219 > 6008

Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received for lab by (Signature)

Samples returned via: FedEx Courier UPS
Temp 3.9c
Bottles Received 1-40z
Date 7/22/05
Time 0900

Condition (lab use only)
COC Seals intact ___ Y ___ N ___ NA
pH Checked
NCF



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport, MS
Phone: 228-396-0488
Client Project #
ESC Key
FAX
Site/Facility ID# 9397
P.O.#
Collected by: Rob Hundl
Collected by (signature)
Immediately Packed on Ice N Y
Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed
Email? No Yes
FAX? No Yes
No. of Cntrs

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time
Treated Pile #10		Soil		7-24-08	3 PM

Analysis / Container / Preservative: TCLP Lead

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

CoCode (lab use only)
Template/Prelogin
Shipped Via
Sample # (lab use only)
6582788

*Matrix: SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

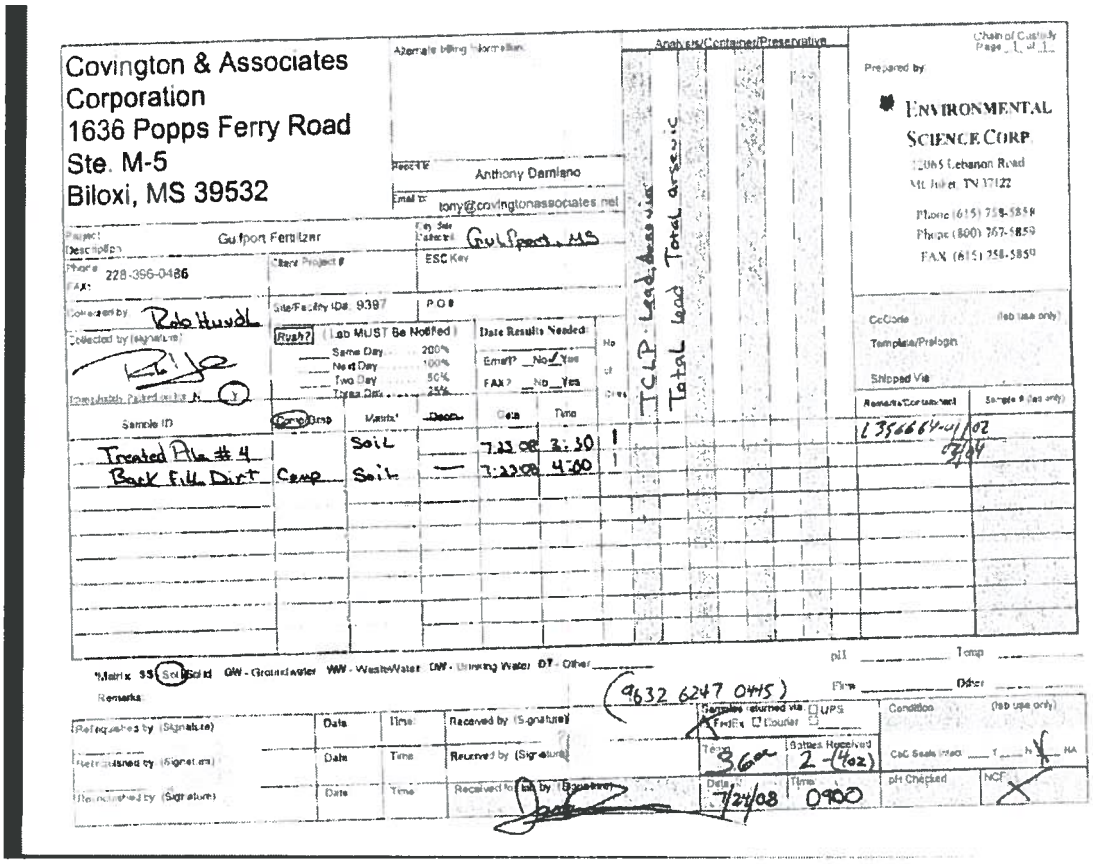
pH _____ Temp _____
Flow _____ Other _____

Remarks: 1632 6247 0364

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received for Lab by: (Signature)

Samples returned via: FedEx Courier UPS
Tracking # 5-5[illegible]
Bottles Received 1
Date 7-25-08 Time 900

Condition (lab use only)
COC Seals Intact Y N NA
pH Checked NCF



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information:

Anaylses/Container/Preservative

Chain of Custody
Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

Receive: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City State Collected: Gulfport, MS
Phone: 228-396-0486
Client Project #
ESC Key
FAX:
Collected by: Rob Hurst
Site/Facility ID#: 9397
P.O.#
Collected by (signature):
Immediately Packed on Ice: N (Y)

Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes

CoCode: (lab use only)
Template/Prelogin:
Shipped Via:

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	# of bottles	TCLP Lead & Arsenic	Total Lead	Total arsenic	Remarks/Container #	Sample # (lab only)
Treated Pile #4		Soil		7.23.08	3:30	1				L356664-01	02
Back Fill Dirt	Comp	Soil		7.23.08	4:00	1					03/04

*Matrix: SS (Soil/Solid) GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other

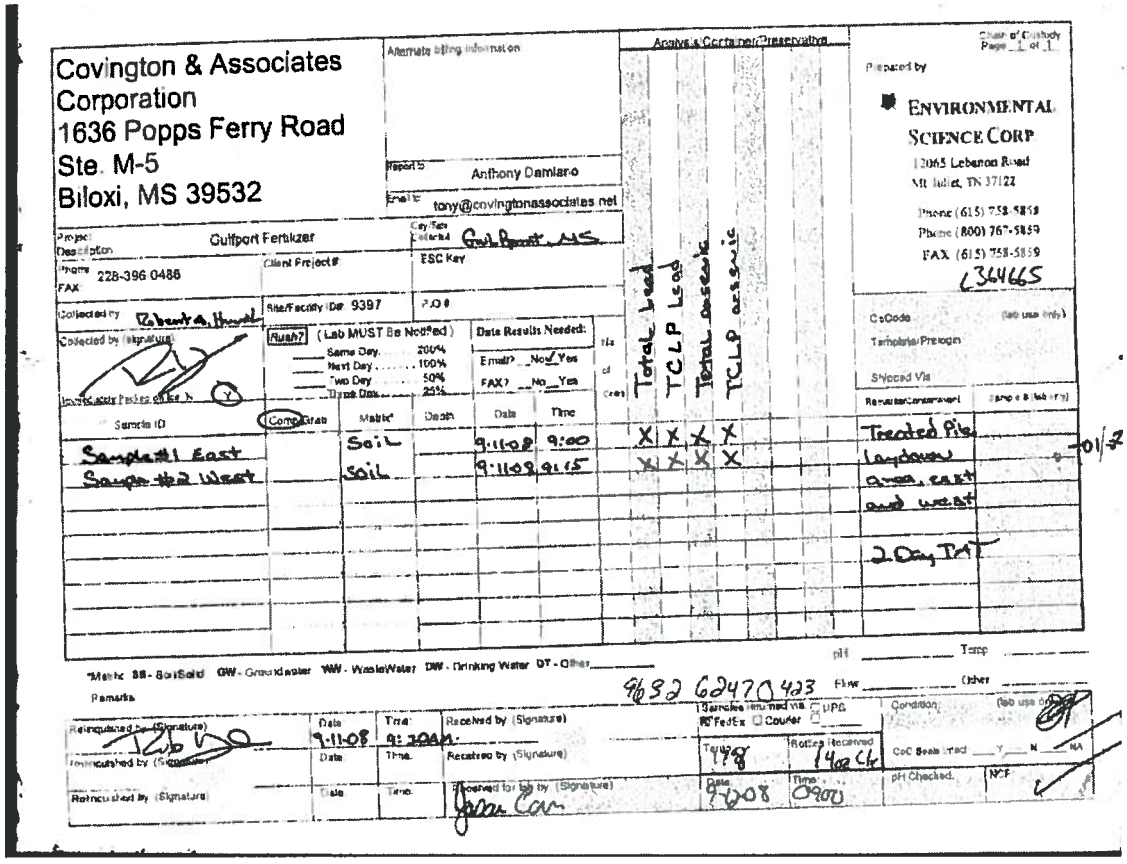
pH _____ Temp _____
Flow _____ Other _____

Remarks: (9632 6247 0445)

Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received for lab by (Signature)

Samples returned via: FedEx Courier UPS
Tracking # 3600
Bottles Received: 2 (402)
Date: 7/24/08 Time: 0900

Condition: (lab use only)
COC Seals Intact: Y N NA
pH Checked
NCF: X



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Report To: Anthony Damiano
Email To: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport, MS
Phone: 228-396-0486
Client Project #
ESC Key
FAX:
Site/Facility ID#: 9397
P.O.#
Collected by: Robert A. Hurst
Collected by (signature):
Immediately Packed on Ice: Y
Rush? (Lab MUST Be Notified): Same Day 200% / Next Day 100% / Two Day 50% / Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes
No. of Cntrs

Analysis/Container/Preservative: Total Lead; TCLP Lead; Total Arsenic; TCLP Arsenic

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859
L364665

CoCode: (lab use only)
Template/Prelogin
Shipped Via:
Remarks/Contaminant
Sample # (lab only)

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time					
Sample #1 East		Soil		9-11-08	9:00	X	X	X	X	Treated Pile Laydown area, east and west
Sample #2 West		Soil		9-11-08	9:15	X	X	X	X	
										2 Day TAT

pH _____ Temp _____
*Matrix: SS - Soil/Solid GW - Groundwater WW - Wastewater DW - Drinking Water OT - Other _____
Flow _____ Other _____
Remarks: 9632 6247 0423

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: UPS / FedEx / Courier	Condition: (lab use only)
Robert A. Hurst	9-11-08	9:20AM		Tracking #	
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: 1.9	Bottles Received: 14 oz Clr
Relinquished by (Signature)	Date	Time	Received for lab by (Signature): John Carr	Date: 9-12-08	Time: 0900
				pH Checked:	NCF:

COC Seals Intact: ___ Y ___ N ___ NA

ENVIRONMENTAL SCIENCE CORP.

SAMPLE NON-CONFORMANCE FORM

Sample No.: L364665

Date: 9-12-08

Evaluated by: Joan Carr

Client: COVASSO

Non-Conformance (check applicable items)

____	Chain of Custody is missing	____	Login Clarification Needed
____	Improper container type	____	Improper preservation
____	Chain of custody is incomplete	____	Container lid not in tact
____	Parameter(s) past holding time	X	Improper temperature
X	Broken container(s) **see below**	____	Broken container: sufficient sample volume remains for analysis requested

X Insufficient packing material around container

X Insufficient packing material inside cooler

____ Improper handling by carrier (FedEX / UPS / Courier)

____ Sample was frozen

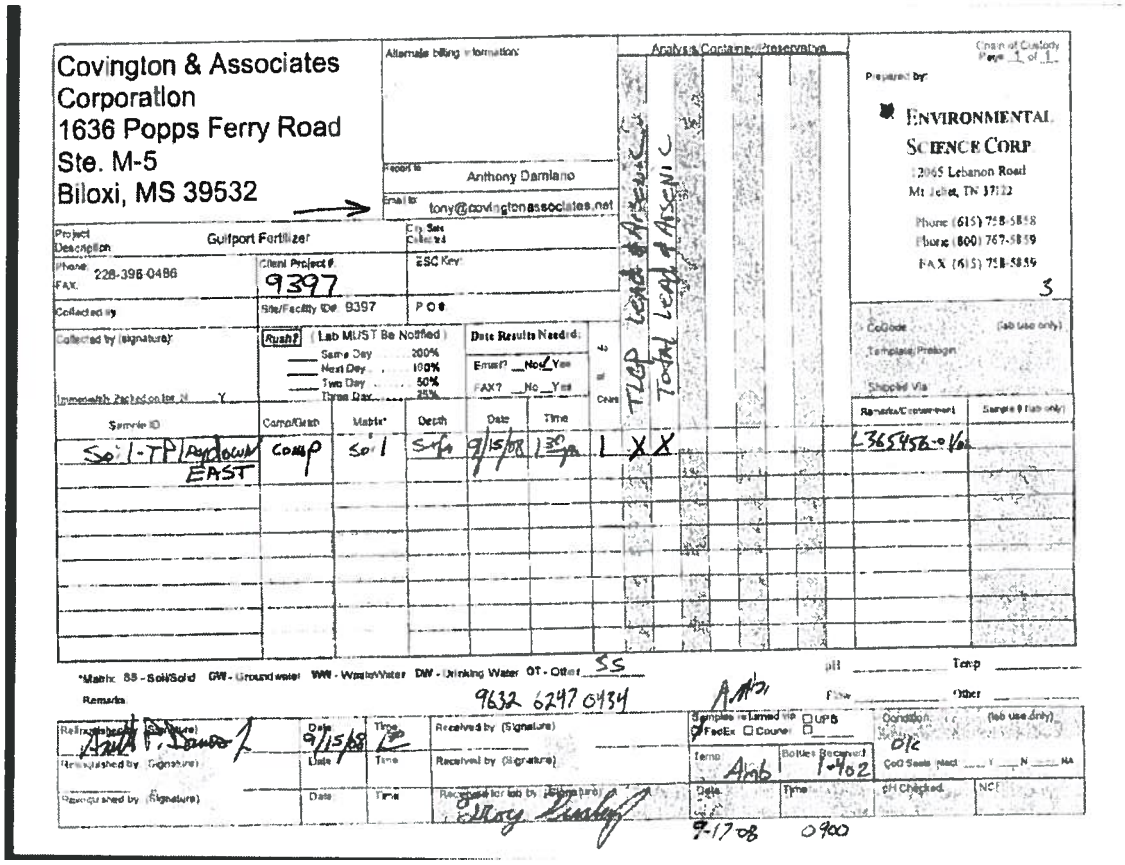
Comments: Sample #1 East was received broken.
Sample #2 West was received at 17.8°c.

Login Instructions: **TSR Initials:** JB

Client informed by call / email / fax / voice mail date 9/12/08 time ____

Client contact:
Oleft message
Client notified do not run Sample #1 East

Craig



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information:

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City Site Collected:
Phone: 228-396-0486
FAX:
Client Project # 9397
ESC Key:
Collected by:
Site/Facility ID# 9397
P.O.#
Collected by (signature):
Immediately Packed on Ice: N Y

Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	# of Cntrs	Analysis / Container / Preservation: TCLP Lead & Arsenic; Total Lead & Arsenic	Remarks/Contaminant	Sample # (lab only)
Soil-TP1 Pydown EAST	Comp	Soil	Surface	9/15/08	1330	1	XX	L365456-01	

*Matrix: SS - Soil/Solid GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other SS

Remarks: 9632 6247 0434

pH _____ Temp _____
Flow _____ Other _____

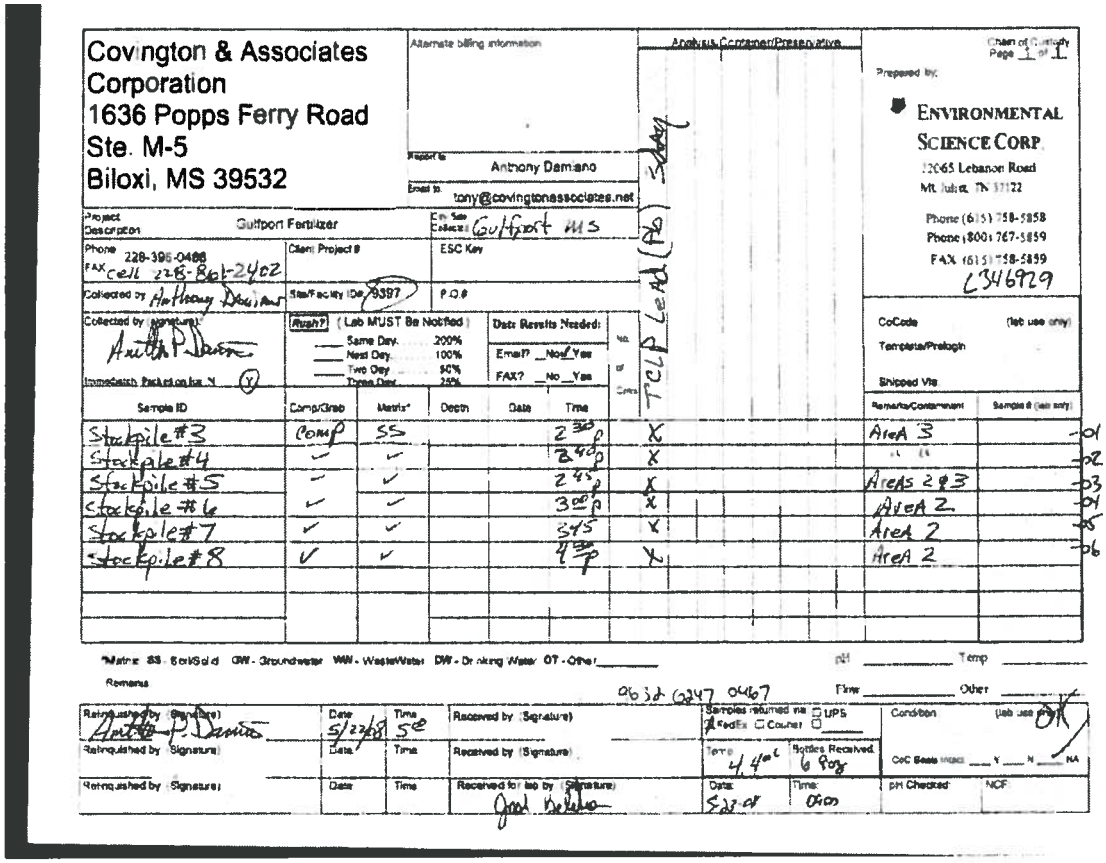
Prepared by:
ENVIRONMENTAL SCIENCE CORP
2065 Lebanon Road
Mt Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

Chain of Custody Page 1 of 1

3

CoCode: (lab use only)
Template/Prelogin:
Shipped Via:

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: UPS FedEx Courier	Condition: (lab use only)
[signature]	9/15/08	1700		Temp: 4°C	Bottles Received: 1402
Relinquished by (Signature)	Date	Time	Received by (Signature)	COC Seals Intact: Y N NA	
Relinquished by (Signature)	Date	Time	Received for lab by (Signature): [signature]	Date: 9/17/08	Time: 0900
				pH Checked:	NCF:



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information:

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
Env. Sam. Collected: Gulfport MS

Phone: 228-396-0466
FAX: cell 228-861-2402
Client Project #:
ESC Key:
Collected by (Print): Anthony Damiano
Site/Facility ID#: 9397
P.O.#:
Collected by (signature):
Immediately Packed on Ice N (Y)

Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes

Analysis/Container/Preservative: TCLP Lead (1D) 5 day

Chain of Custody Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP
22065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859
L346929

CoCode (lab use only)
Template/Prelogin
Shipped Via

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time		Remarks/Contaminant	Sample # (lab only)
Stockpile #3	Comp	SS			2:30p	X	Area 3	-01
Stockpile #4	~	~			2:40p	X		-02
Stockpile #5	~	~			2:45p	X	Areas 2 & 3	-03
Stockpile #6	~	~			3:00p	X	Area 2	-04
Stockpile #7	~	~			3:45	X	Area 2	-05
Stockpile #8	~	~			4:30p	X	Area 2	-06

*Matrix: SS - Soil/Solid GW - Groundwater WW - Wastewater DW - Drinking Water OT - Other

pH _____ Temp _____

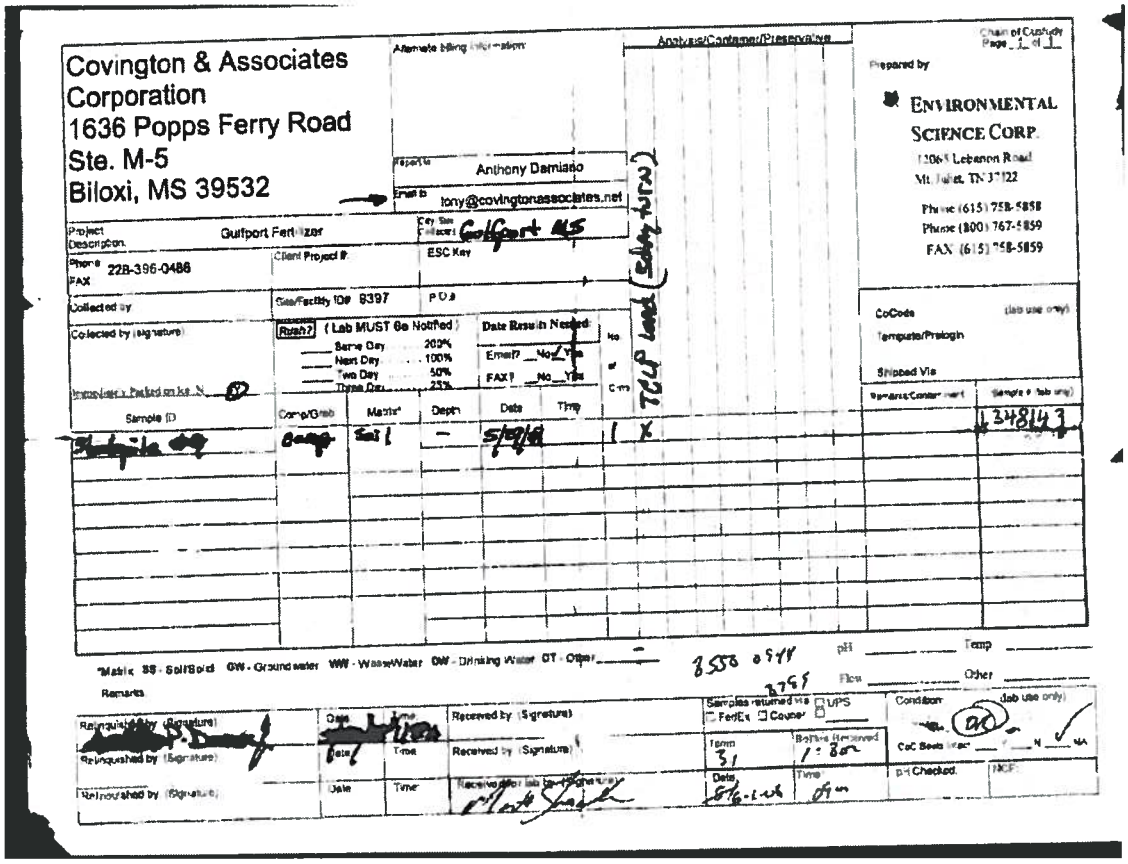
Remarks: 0638 0247 0467

Flow _____ Other _____

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: FedEx Courier UPS	Condition (lab use only)
Anthony P. Damiano	5/22/08	5pm			OK
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: 4.4°C	Bottles Received: 6 poly
Relinquished by (Signature)	Date	Time	Received for lab by (Signature): Jack Nelson	Date: 5.23.08	Time: 0805

COC Seals Intact: ___ Y ___ N ___ NA

pH Checked: NCF:



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information:

Analysis/Container/Preservative

Chain of Custody
Page 1 of 1

Prepared by:
ENVIRONMENTAL SCIENCE CORP.
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport MS

Phone: 228-396-0486
FAX:
Client Project #:
ESC Key:

Collected by:
Collected by (signature):
Immediately Packed on Ice N Y

Site/Facility ID# 8397
P.O.#

Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed:
Email? No Yes
FAX? No Yes

No. of Cntrs

TCLP Lead (5day turn)

CoCode (lab use only)
Template/Prelogin
Shipped Via
Remarks/Contaminant
Sample # (lab only)

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time			348143
[illegible]	Comp	Soil	—	8/9/18		1	X	

*Matrix: SS - Soil/Solid GW - Groundwater WW - Wastewater DW - Drinking Water OT - Other

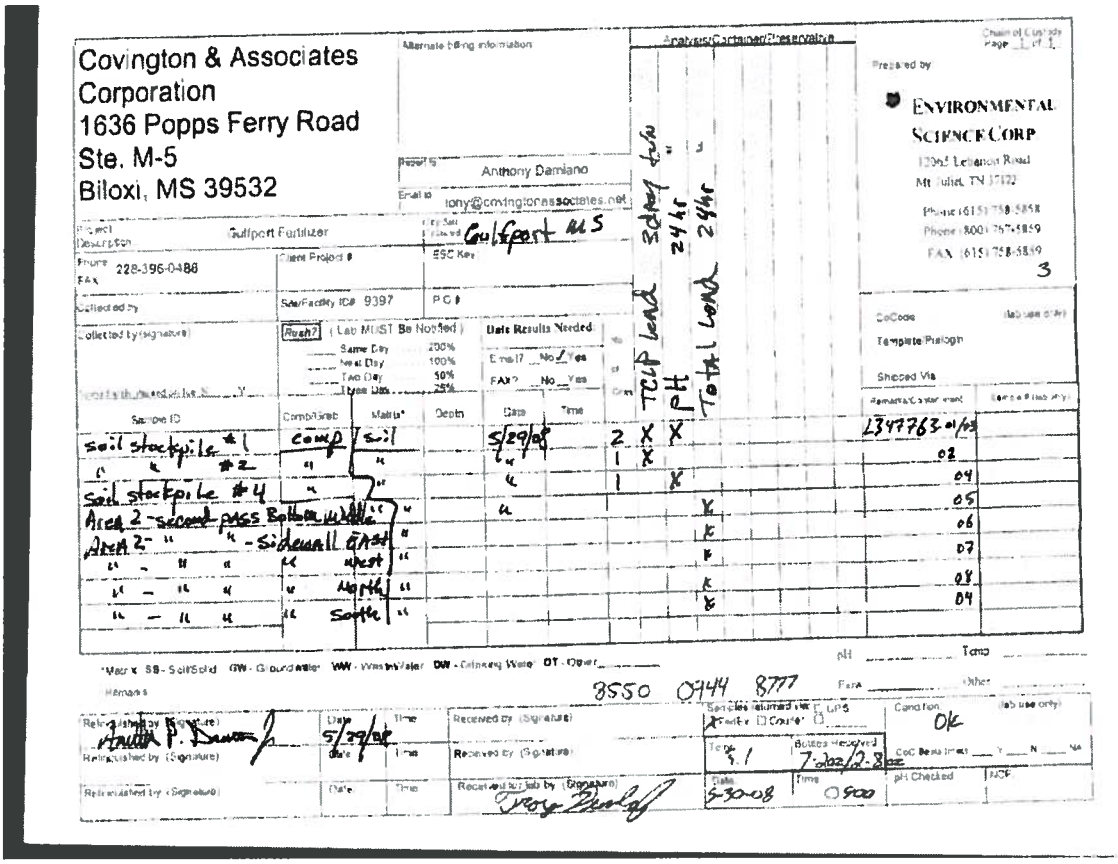
8550 8941 8795

pH _____ Temp _____
Flow _____ Other _____

Remarks:

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: ☐ UPS ☐ FedEx ☐ Courier	Condition: (lab use only)
Relinquished by (Signature)	Date	Time	Received by (Signature)	Temp: 3!	Bottles Received: 1 : 80z
Relinquished by (Signature)	Date	Time	Received for lab by (Signature)	Date: 8/6-18	Time: 09

COC Seals Intact: ___ Y ___ N ___ NA
pH Checked:
NCF:



Covington & Associates Corporation
1636 Popps Ferry Road
Ste. M-5
Biloxi, MS 39532

Alternate billing information

Analysis/Container/Preservative

Chain of Custody Page 1 of 1

Prepared by
ENVIRONMENTAL SCIENCE CORP
12065 Lebanon Road
Mt Juliet, TN 37122
Phone (615) 758-5858
Phone (800) 767-5859
FAX (615) 758-5859
3

Report to: Anthony Damiano
Email to: tony@covingtonassociates.net

Project Description: Gulfport Fertilizer
City/State Collected: Gulfport MS
Phone: 228-396-0486
Client Project #
ESC Key
Collected by
Site/Facility ID# 9397
P.O. #
Collected by (signature)
Rush? (Lab MUST Be Notified)
Same Day 200%
Next Day 100%
Two Day 50%
Three Day 25%
Date Results Needed
Email? No Yes
FAX? No Yes
No. of Cntrs
CoCode (lab use only)
Template/Prelogin
Shipped Via
Remarks/Sample # (lab only)

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time		TCLP lead	pH	Total Lead	Remarks/Sample # (lab only)
soil stockpile #1	comp	soil		5/29/08		2	X	X		L347763-01
" #2	"	"		"		1	X			02
" #4	"	"		"		1		X		04
Area 2 - second pass Bottom middle	"	"		"					X	05
Area 2 - " - Sidewall East	"	"		"					X	06
" - " "	"	west		"					X	07
" - " "	"	north		"					X	08
" - " "	"	south		"					X	09

*Matrix: SS - Soil/Solid GW - Groundwater WW - Wastewater DW - Drinking Water OT - Other

pH _____ Temp _____

Remarks: 8550 0744 8777

Flow _____ Other _____

Relinquished by (Signature)	Date	Time	Received by (Signature)	Samples returned via: UPS FedEx Courier	Condition (lab use only)
Heather P. Duncan	5/29/08		Received by (Signature)	Temp 5.1	Bottles received 7
Relinquished by (Signature)	Date	Time	Received by lab by (Signature)	Date 5-30-08	Time 0900
Relinquished by (Signature)	Date	Time			

COC Seal Intact: Y N NA

pH Checked NCF

APPENDIX G

WASTE ANALYSIS PLAN

WASTE STABILIZATION & ANALYSIS PLAN'S

for

Covington & Associates Corporation
Biloxi, MS

Prepared for:

Gulfport Fertilizer Site
33rd Street
Gulfport, MS

Prepared by:

Remediation Services, Inc.
P.O. Box 587
Independence, KS 67301
316-331-1200

July 1, 2008

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1.0 INTRODUCTION

Remediation Services, Incorporated (RSI), an environmental remediation firm located in Independence, Kansas, has been contracted by Covington & Associates Corporation to develop a Waste Analysis Plan (WAP) for Lead impacted soil at the former Gulfport Fertilizer Site, Gulfport, MS. This document also includes a detailed description of the stabilization process proposed for the site. A site location map is included as Figure 1.

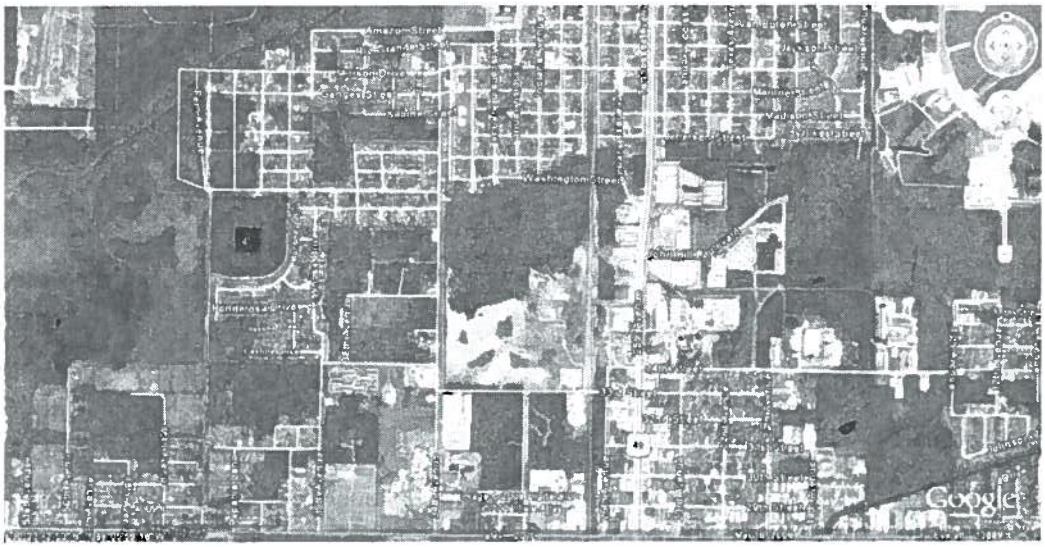
Implementation of these plans will be by RSI. Oversight of this project will be provided by Covington & Associates Corporation (Covington).

Based upon the results of previous sampling of stockpiled soils performed by Covington, it has been determined that seven of the ten soil stockpiles present at the site exhibits an elevated level of lead. A removal action plan has been developed for the impacted soil that consists of on-site stabilization, transportation and off-site disposal of the contaminated soils.

The objective of this WAP is to provide a detailed overview of the proposed stabilization methodology, including proposed methods for sampling, to demonstrate that all impacted soil of concern has been treated, and that the stabilized soil no longer exhibits the characteristic of a hazardous waste. The Waste Analysis Plan has been prepared in compliance with the requirements specified in 40 CFR 261 Subpart C, 265 Subpart B, 265 Subpart Q and 268 Subpart A and D.

A report will be prepared by RSI documenting the amount of waste treated and transported off-site. Covington will prepare a final report describing the locations and results of the confirmation samples, and all other pertinent data.

Site Map



2.0 OVERVIEW OF THE WASTE ANALYSIS PLAN

Prior to treatment, storage or disposal of any hazardous or non-hazardous waste, the owner or operator must obtain a detailed chemical and physical analysis of a representative sample of the waste (40 CFR 265.13 (a)(1)). It is also stated that, at a minimum, the analysis must contain all the information which must be known to treat, store or dispose of the waste in accordance with Parts 265 and 268.

A written waste analysis plan must be prepared that describes the procedures that will be used to comply with the above requirement (40 CFR 265.13 (b)). This section also identifies the minimum components of the plan which are summarized below:

The WAP must specify the parameters for which each hazardous or non-hazardous waste will be analyzed and the rationale for the selection of these parameters.

The WAP must specify the test methods that will be used to test for the parameters.

The WAP must specify the sampling method to be used to obtain a representative sample of the waste to be analyzed. The sampling method must be one of the methods specified in Appendix I of Part 261 or an equivalent method.

The WAP must specify the frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date.

If the waste is to be disposed off-site at a treatment, storage or disposal facility, the WAP must specify what analyses will be provided to the off-site facility by the generator.

Additional requirements are listed in 40 CFR 265.13 (b); however, these requirements are not applicable for this site.

40 CFR Part 265, Subpart Q provides additional requirements for waste that is treated chemically, physically or biologically. 40 CFR 265.402 states that whenever a substantially different process than any previously used at the facility is to be used to treat hazardous waste, the owner or operator must, before treating the different waste or using the different process or equipment:

1) Conduct waste analyses and trial treatment tests:
or
2) Obtain written, documented information on similar treatment of similar waste under similar operating conditions to show that the proposed treatment will meet all applicable requirements of 265.401 which are the general operating requirements for chemical, physical or biological treatment systems.

2.1 Waste Analysis Plan Format

The requirements specified in Section 2.0 are addressed in the remainder of this document. Section 3.0 provides the identification of the material to be stabilized on site. Section 4.0 provides a detailed description of the proposed stabilization procedure which includes the waste handling plan. Section 5.0 presents the waste sampling and analysis plan. An erosion and sediment control plan is presented in Section 6.0.

3.0 IDENTIFICATION OF WASTES TO BE TREATED

There are ten (10) 100 cubic yard soil stockpiles of excavated soil from the lead impacted areas on-site. Covington has received analytical data (TCLP Lead) for each of the ten stockpiles. Seven (7) of the stockpiles exhibited the Characteristic of a Hazardous Waste for Lead (>5.0 mg/l). The seven soil stockpiles (3, 4, 5, 6, 7, 8 & 10) are characterized as a D008 Characteristic Hazardous Waste.

The proposed treatment process will convert the characteristic hazardous waste to a non-hazardous waste. The fixated material will be disposed of as an industrial waste in a properly permitted Subtitle D waste landfill.

Based upon the stockpiled soils generated during excavation removal activities Covington estimates that approximately 1,000 tons of soil will require treatment and off-site disposal.

Table I lists the pertinent waste characteristics of the soils to be treated on-site.

TABLE I

WASTE CHARACTERISTICS

Waste Steam	RCRA Number	Basis For Hazardous Listing	Chemical Composition
Soil	D008	Lead	TCLP Lead >or = 5 mg/l

4.0 PROPOSED REMEDIATION PROCEDURE

4.1 Overview

The proposed remediation action plan consists of on-site stabilization by use of a hydraulic excavator, rolloff containers, temporary storage (stockpiling) of stabilized waste, sampling and analysis of the stabilized waste and subsequent off-site disposal of the stabilized waste as a non hazardous waste.

Lead impacted soils have been excavated and stockpiled into ten (10) 100 cubic yard stockpiles. Covington has received analytical data (TCLP Lead) for each of the ten stockpiles. Seven (7) stockpiles exhibit the Characteristic of a Hazardous Waste for Lead (>5.0 mg/l). The seven (7) soil stockpiles, No's 3, 4, 5, 6, 7, 8 and 10 are characterized as a D008 Characteristic Hazardous Waste. Each stockpile will be stabilized in place by mixing a stabilization reagent with the soil. Each stabilized stockpile will be analyzed for lead per the procedures specified in Section 5.0 of this WAP. Stockpiles that exhibit less than 5 mg/L lead will be loaded into trucks for offsite disposal as a non-hazardous waste.

The proposed on-site treatment of waste, which exhibits the Characteristic of a Hazardous Waste for lead at this site, will consist of permanent stabilization of the waste using EnviroBlend®. RSI has determined through prior experience that wastes which exhibit the characteristic for lead (D008) can be rendered non-hazardous with the addition of 1.5% to 3% by weight of reagent to the waste. Bench tests have been performed on this waste to ensure the waste is amenable to treatment. A copy of the bench scale treatability study is included as Attachment 1 of this document.

4.2 Stabilization

EnviroBlend® is a two-component treatment chemical containing a phosphate compound and a buffer. The phosphate compound provides a source of phosphate ions, which form insoluble salt with a variety of metals. The buffer controls the pH in a range where metal phosphate compounds are the least soluble. An MSDS for EnviroBlend® has been included as Attachment 2.

The EPA's Multiple Extraction Procedure (MEP) is the most accepted approach to measuring the long-term stability of treated wastes. The EPA designed the MEP to simulate 1,000 years of leaching. Previous testing performed by others has demonstrated that wastes treated with EnviroBlend® and tested by the MEP maintained a pH level throughout the test to within 0.3 SU. Additionally, leachable lead concentrations did not increase during the test.

4.3 Material Handling Plan

RSI proposes to perform stabilization of the hazardous components of the soil at the site. The contaminated soil is currently staged in approximately 100 cubic yard stockpiles and will be placed into rolloff containers, will be temporarily stored in containers, mixed with EnviroBlend, temporarily stored and covered in stockpiles, and analyzed to ensure the stabilization has been successful. The resulting stabilized soil will then be disposed of at an approved Subtitle D landfill as a non-hazardous waste. The sampling and analysis plan for the stabilized soil is provided in Section 5.

EnviroBlend® will be added to the soil from containers containing a known volume of reagent. The volume of soil in each container to be stabilized will be calculated to ensure that the correct amount of reagent is added. The EnviroBlend® and soil will be subsequently mixed utilizing a hydraulic excavator, equipped with a smooth edge bucket, until a homogenous mixture has been achieved. Dust generation and dust control will be achieved through the use of water sprays.

Stabilized materials will remain in the stockpiles and sampled in accordance with SW-846. Composite treatment verification samples will be collected as described in Section 5.0.

Stabilized soil which meets the initial landfill disposal criteria for chrome (i.e., $\leq$4.25 mg/L Cr) as determined by the TCLP will be transported for disposal at Waste Management's Pecan Grove Landfill, Christian Pass, MS a Subtitle D disposal facility.

Treated material that exhibits a concentration greater than 4.25 mg/L chrome, as determined by the TCLP, will be re-analyzed. If the duplicate sample exhibits less than 5.0 mg/L the stockpile will be transported offsite for disposal. In the unlikely event that the material fails to meet the land

disposal restriction requirements, the materials will be reprocessed in the same manner as the untreated soil.

Once the stabilization activities at the site are complete, the excavator and rolloff containers will be decontaminated by scraping to remove all adhering materials. Liquids used in the final decontamination of the equipment will be allowed to soak into a stockpile. These materials will be added to the last stockpile of treated material prior to sampling.

Large debris, (concrete, steel, stone or cobbles greater than two- (2) foot in diameter) which requires decontamination rather than treatment, will be temporarily staged in the treatment area. This debris will be decontaminated by scraping and washing the debris in or over a container. Decontamination will be considered adequate when all residual waste has been removed. Rinsate generated from the decontamination activities will be reused for dust suppression.

4.4 Health and Safety Plan

A Health and Safety Plan (HSP) will be developed for all field activities included in this cleanup effort. The HSP will comply with requirements outlined by the Occupational Health and Safety Administration (OSHA) 29 CFR, Part 1910.120 - Hazardous Waste Operations and Emergency Response Standard. Specifically, the HSP will include:

General Information:
- Address
- Tasks/Activities
- Personnel/Responsibilities

Site/Hazard Characteristics
- Facility Description
- Site Access
- Unusual Features
- Nature of Contamination
- Hazard form/Characteristics
- Major Health Hazards

Task Health and Safety Analysis
- Hazard/Risk Evaluation
- Personal Protection
- Area/Personnel Monitoring

General Site Requirements
- Work Zones

Fit Test Requirements
Medical Monitoring Requirements
Training Requirements

Contamination Control
Local Resources
Site Resources
Personnel Roles
Emergency Contacts
Emergency Routes
- Hospital
- Evacuation

Site Communications
Reporting Procedures
Response Procedures

Minimum Attachments
Attachment A - Site Maps
Attachment B - Route to Hospital
Attachment C - Chemical Hazard Information
Attachment D - Site Safety Plan Acknowledgment Form

All project field personnel will be required to provide documentation of 40-hour health and safety training and 8-hour refresher training.

5.0 WASTE SAMPLING AND ANALYSIS

5.1 Overview

Sampling and analyses will be performed for three purposes. The first purpose is to assure that all soil above action levels is excavated (Excavation Confirmation Sampling). The excavation confirmation sampling and analysis will be performed by Covington. The second purpose is to characterize the stockpiles to determine whether the waste is hazardous or non-hazardous established by TCLP criteria (Stockpile Characterization). The stockpile characterization will be performed by RSI. The third purpose is to confirm that the treated soil meets established TCLP criteria (Process Confirmation Sampling) which will be performed by RSI.
Only the process confirmation sampling methodology is described in this section. In addition, the analytical laboratory methods and quality assurance (QA) plan are also discussed in this section.

5.2 Process Confirmation Sampling

Stabilized soil will be managed in stockpiles within the staging area until confirmation of successful treatment in the following manner. Each batch of fixated soil will be assigned a unique batch number. Each stockpile will be made up of individual batches and stockpiled together to reach an accumulative total of approximately 100 cubic yards. Each stockpile will be assigned an individual stockpile number. The stockpile number and the corresponding batch numbers which make up the stockpile will be recorded in the project log book.

The following sampling procedures will be followed to ensure that the collections of process confirmation samples are representative. Each pile, as previously described, will be composed of approximately 100 cubic yards. Each soil pile will be imaginarily sectioned into quarters. See Figure 2. Three discrete soil samples will be collected from each of the four quarters. The discrete soil samples will be collected with a shovel or hand auger. The discrete samples will be collected towards the center of the pile at the top, middle and bottom third of the stockpile's height. The twelve discrete samples will be used to create the composite sample for the confirmation analysis. Each of the discrete samples will be placed in to a container lined with plastic. The discrete samples for each individual stockpile will be mixed using EPA's quarter method. All of the discrete samples representing a stockpile will be placed onto a mixing table lined with new plastic sheeting and thoroughly mixed together. The sample will then be divided into quarters.
Each quarter will be mixed, and then all quarters will be mixed together. This procedure for quartering and mixing will be repeated three times before collecting the composite sample for TCLP lead analysis. The remainder of mixed soil will be returned to the same stockpile from which it was collected.

The individual stockpile samples and duplicates will be analyzed by Environmental Science Corporation, Juliet, TN on a 24 hour basis.

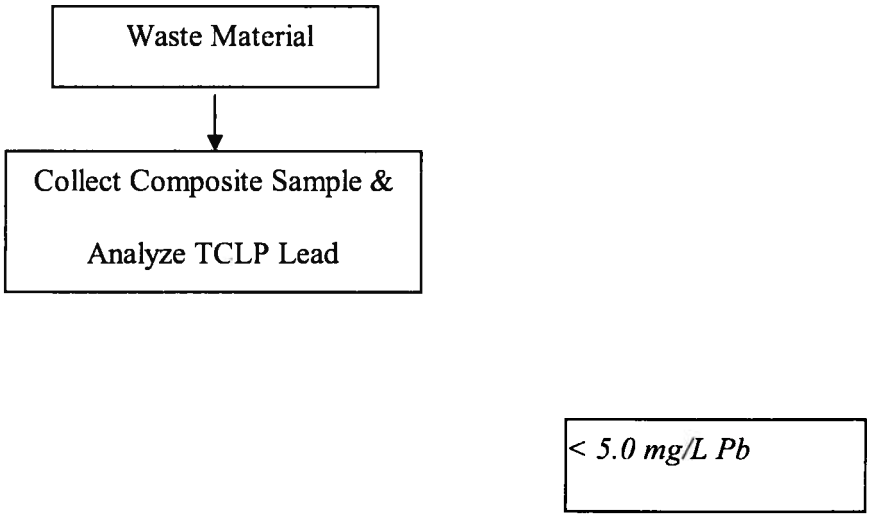
All sampling equipment will be decontaminated using a clean water rinse followed by an Alconox solution wash and a distilled water rinse. Decontamination water will be drummed for later sampling and disposal. Pb contaminated liquids will be utilized in the treatment process during stabilization activities.

5.3 Laboratory Analysis

Process Confirmation Samples will be analyzed for TCLP using Method SW-846-1311 for extraction. The extract will then be analyzed for lead using EPA Method SW-846-6010.

Analytical TABLE II
TREATED WASTE ANALYTICAL FLOW CHART
Remediation Services, Inc.
All Analysis TCLP Pb (Lead)
Hancock Bank / Gulfport Fertilizer

Gulfport, MS


Waste Material
Collect Composite Sample &
Analyze TCLP Lead
< 5.0 mg/L Pb

5.4 Quality Assurance Plan

The overall objective of the QA Plan is to develop and implement procedures for field sampling, chain of custody, laboratory analysis and reporting that will provide defensible and reproducible results.

Field duplicate stockpile samples will be collected and submitted to the analytical laboratory to provide a means to assess the quality of the data resulting from the field sampling. The general level of QA effort for this project will be at least one field duplicate for every 10 composite samples.

The level of laboratory QA effort will be consistent with that currently used by the EPA Contract Laboratory Program as specified in:

> US. EPA , "Test Methods for Evaluating Solid Waste - Physical/Chemical Methods". Office of Solid Waste and Emergency Response. November 1986, SW-846, Third Ed.

The accuracy, precision and sensitivity criteria for analytical data will be as specified for the individual analytical methods specified above. Spectrum Lab's quality Assurance/Quality Control Procedures are available upon request.

5.5 Corrective Measures

The purpose of this section is to provide a procedure for corrective action to be taken when a review of documents, a field or lab inspection, or a QC analysis indicates unsatisfactory performance or results in the sampling or analytical techniques.

The corrective measures that will be taken for each sample matrix are as follows:

> If sample collection evaluations or duplicate sampling indicate improper techniques were used, insufficient documentation was performed or any other reason sampling collection integrity can be questioned, the sample(s) will be considered void and additional samples will be collected after the deficiency has been corrected.

.

5.6 Recordkeeping/ Reporting Procedures

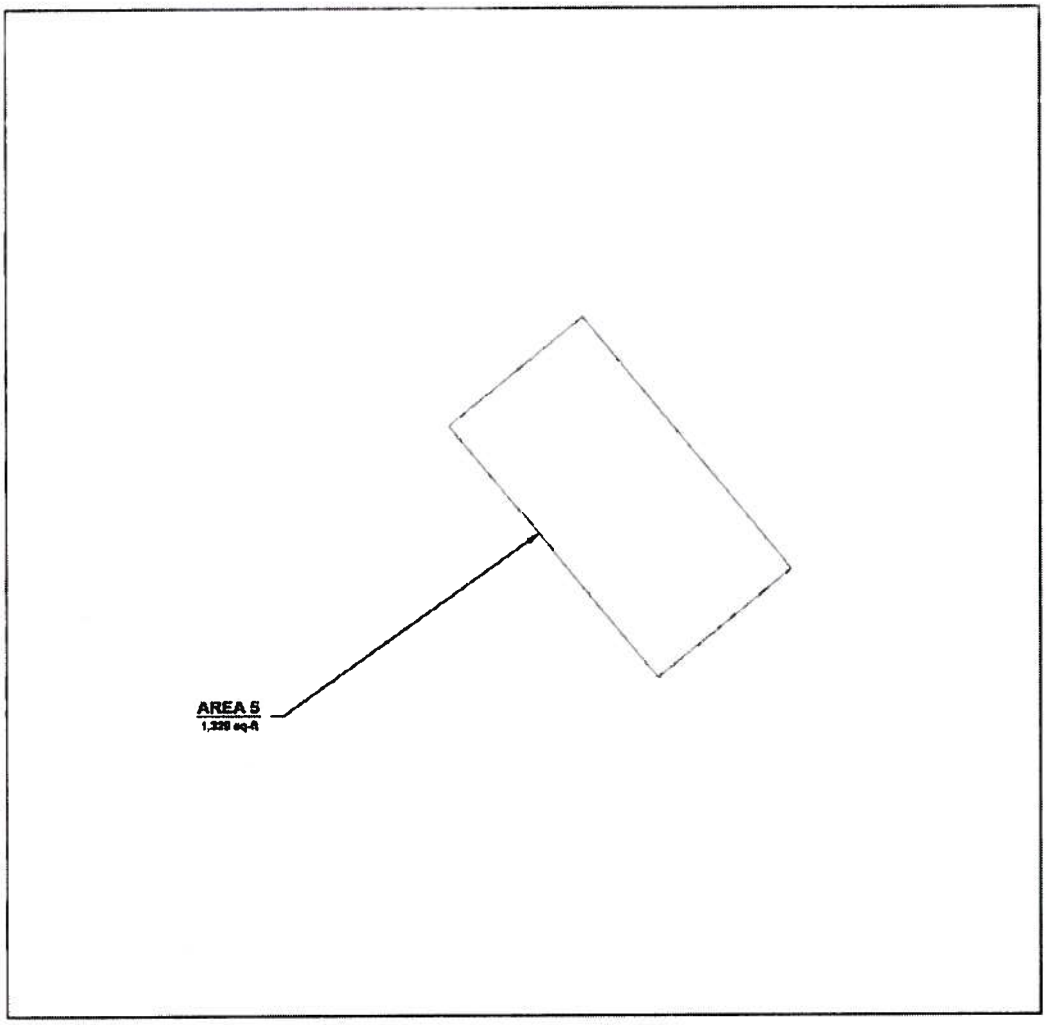
Recordkeeping will be the primary emphasis of the Quality Assurance Plan. Although the primary emphasis of the QAP is the control of sample collection and analysis, certain records must be maintained to ensure samples are distinguishable, sample collection protocols are followed and correct laboratory procedures are followed to produce accurate analytical results and that control problems can be identified. Other concerns include validation, traceability, data and sample security, representativeness and retrievability.

Bound log books shall be utilized for recordkeeping. Loose sheets will be used only for report records. The use of bound books tends to result in a chronological sequence of data insertion and aids in referencing data through a table of contents ordered according to time, type of analysis, type of sample, and/or identity of collector/analyst.

Logbook entries shall be completed in ink. Corrections will be made by drawing one line through the incorrect entry, entering the correct information, and initialing and dating the change.

Accountability for a sample will begin when the sample is taken from its natural environment. A bound logbook will be maintained to record the acquisition of a sample. The information that will be recorded is project name, unique sample number, matrix, sample location, date and time, sampling method and any other pertinent information.

In addition a summary sheet of the samples collected for process confirmation samples will be kept to insure that duplicate samples are collected at the required frequency.

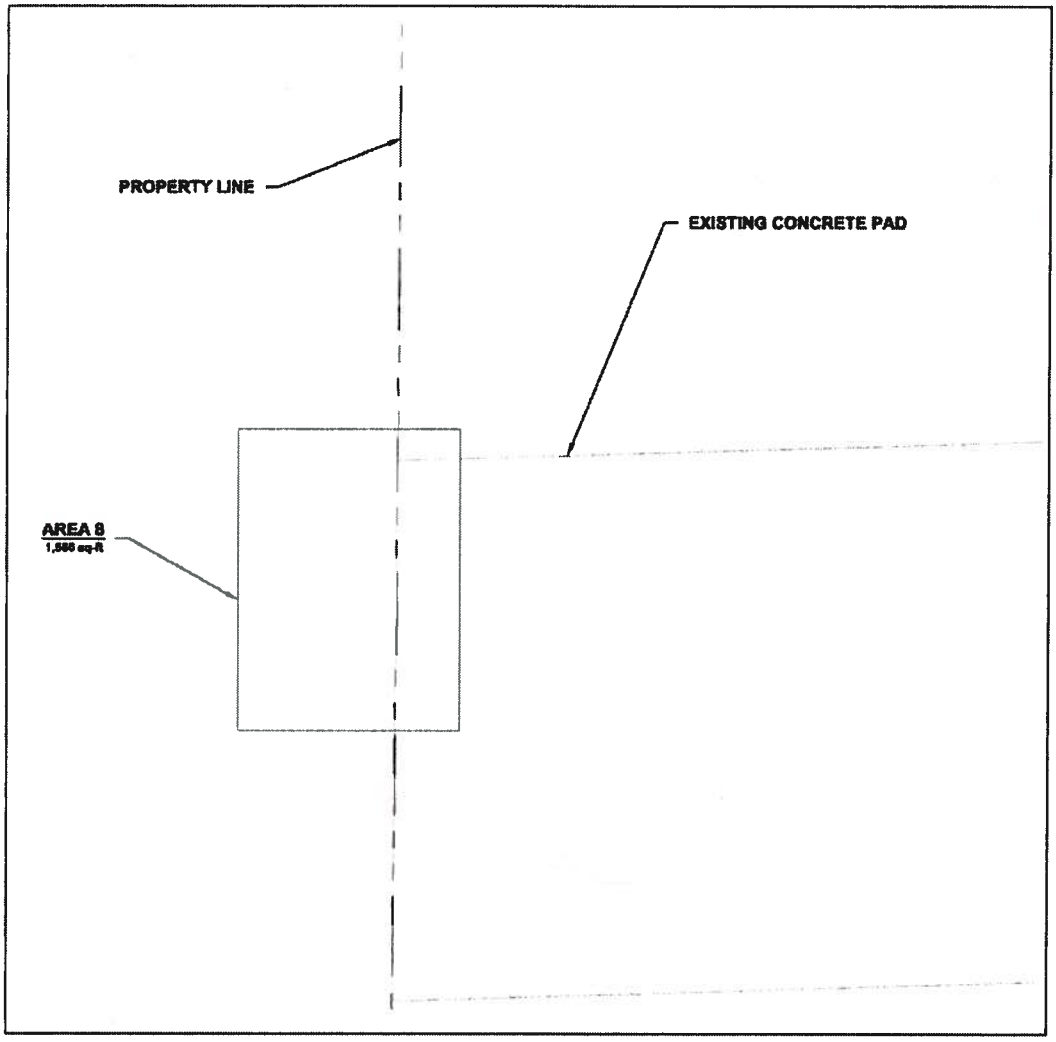


AREA 5
1" = 20'

20 0 20

LEGEND	
	PROPOSED LEAD EXCAVATION AREA OUTLINE
AREA 5 1,328 sq-ft	DESIGNATION FOR PROPOSED EXCAVATION AREAS AND SQUARE FOOTAGES FOR EACH AREA

AREA 5



AREA 8
1" = 20'

20 0 20

LEGEND	
	PROPOSED LEAD EXCAVATION AREA OUTLINE
AREA 8 (1,500 sq-ft)	DESIGNATION FOR PROPOSED EXCAVATION AREAS AND SQUARE FOOTAGES FOR EACH AREA
	GROUNDWATER MONITORING WELL

AREA 8

COVINGTON CIVIL & ENVIRONMENTAL, LLC

14257 DEDEAUX ROAD
SUITE B
GULFPORT, MS 39503

PHONE (228) 396-0486
FAX (228) 396-0487
E-MAIL LARSLARSON28@GMAIL.COM

August 18, 2010

Ms. Kayra Johnson, Project Engineer
Office of Pollution Control
Mississippi Department of Environmental Quality
Groundwater Assessment & Remediation Division
Jackson, Mississippi 39289-0385

Re: Comprehensive Groundwater Monitoring Report – June 2010
Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi
CCE Project No. 9397

Dear Ms. Johnson:

On June 14 and 15, 2010, Covington Civil & Environmental, LLC (CCE) conducted the second (2nd) comprehensive groundwater sampling event of all 14 monitoring wells at the site per the Mississippi Department of Environmental Quality (MDEQ) approved "Compliance Monitoring Program" of February 2009. The approved Compliance Monitoring Program requires that semi-annual groundwater sampling of all wells take place for three (3) years. This report documents the changes in groundwater quality, potentiometric fluctuations in all of the site monitoring wells, including the newly installed MW-8A. A USGS Topographic Quadrangle Map illustrating the location of the former Gulfport Fertilizer site is included as Figure 1.

BACKGROUND

CCE began conducting groundwater assessment activities at the former Gulfport Fertilizer site in 2001. The history of these activities has been well documented; therefore, no further need to provide a historical chronology is required. Since the MDEQ's approval of Hancock Bank's Corrective Action Program and the initiation of the semi-annual sampling events, the only substantive change that has taken place with respect to the groundwater assessment program has been the abandonment of MW-8. In May 2010, due to repeated incidents of poor groundwater quality (i.e. very high turbidity) in the water evacuated from this well, CCE oversaw the plugging and abandonment of MW-8 and the installation of the replacement well (MW-8A) immediately adjacent to it. Post-installation well development of MW-8A produced excellent water quality with very low turbidity. As the laboratory analytical data for the most recent sampling event demonstrates the abandonment of MW-8 and the installation of MW-8A were beneficial steps in the acquisition of consistent groundwater quality information for the overall site. A monitoring well location map is included as Figure 2.

MONITORING WELL SAMPLING

Prior to monitoring well purging and sampling, CCE measured groundwater levels in each of the 14 monitoring wells. This was conducted to calculate the elevation of the potentiometric surface and to determine the well volume of each well so that an appropriate amount of groundwater would be purged prior to sampling. These groundwater elevations are listed in Table 1.

After recording the groundwater level, dedicated sample tubing was lowered into the well and positioned at approximately the middle of the water column. The sampling pump was then activated and field parameters (temperature, conductivity, pH and field turbidity) were monitored during purging. Purging continued until three (3) consecutive readings did not vary more than 0.5^0 C (field temperature), 3% (conductivity) and 0.1 standard units (pH). Field water quality measurements and parameters were recorded on a "Well Sampling Field Data Sheet" for each monitoring well. Copies of the "Well Sampling Field Data Sheet" for each monitoring well are included in Appendix A.

Once well purging was completed, groundwater samples were collected from each monitoring well. As part of the quality control program for this site, duplicate samples were also collected. One duplicate sample was collected from the set of seven newly installed wells and one from the original set of seven wells. Each sample was labeled and placed in a cooler with ice to maintain 4^0 C. Required information was recorded on the Sample Chain-of-Custody forms, included in Appendix B. The cooler was shipped to Environmental Science Corporation, Mt. Juliet, TN for analysis. Each sample was analyzed for total and dissolved arsenic and lead. The analytical results and field groundwater pH measurements are summarized in Table 2 (arsenic analyses), Table 3 (lead analyses), and Table 4 (pH measurements). The Laboratory Analytical Report Sheets and Chain-of-Custody forms are included in Appendix B.

POTENTIOMETRIC SURFACE

June 2010 Potentiometric Surface

Figure 3 illustrates the potentiometric surface of the surficial aquifer at the Gulfport Fertilizer site during the June 2010 sampling event. Table 1 also lists the groundwater elevations for each of the monitoring wells, as well as historical averages and changes in the potentiometric head over time. The groundwater elevation contours depicted within this map are very consistent with those illustrated during previous sampling events. Due to the amount of data that would be illustrated within a "composite" groundwater surface map, only the potentiometric surface for the June 2010 sampling event is depicted within this report. In reviewing the previous potentiometric surface maps for the sampling periods after all 14 monitoring wells were installed

(2007 through 2010 sampling events); the overall groundwater flow direction and gradient are consistent. The groundwater flow direction is, and has always been from the southeast to the northwest with a gradient that is always less than 1%. The historical average for the site is closer to 0.005 feet/foot; however, the most recent sampling event for June 2010 reports a slightly flatter gradient of roughly 0.0040 feet/foot. This gradient is very similar to the one established in the early years of groundwater and assessment monitoring on the original 33-acre site which included monitoring wells MW-1 through MW-7.

LABORATORY ANALYTICAL RESULTS

Arsenic Concentrations

Table 2 presents the historical arsenic concentrations for groundwater samples collected from all of the wells at the site. Arsenic concentrations have been compared to the MDEQ's Tier 1 Groundwater MCL of 0.010 mg/L.

A review of Table 2 data reveals that the monitoring wells which report measurable concentrations of arsenic that exceed the Tier 1 TRG level are wells within the original 33-acre portion of the property. The previous sampling event from December 2009 reported some detectable arsenic concentrations in the seven newer wells (MW-8 through MW-14), but all were below the Tier 1 TRG of 0.010 mg/L with the exception of MW-8. As pointed out above, MW-8 was plugged and abandoned in May 2010 and a new well, MW-8(A), was installed next to it. Groundwater data from the June 2010 sampling event reports arsenic concentrations at non-detectable levels (<0.010 mg/L) at MW-8(A), as well as the other wells on the expanded portion of the property (seven new monitoring wells).

The arsenic iso-concentration map for the most recent sampling event is included as Figure 4. As Figure 4 reveals, the shape and configuration of the arsenic contours are relatively the same over the past four sampling events, in that the core of the arsenic plume remains in the central to northwestern portion of the original 33-acre site, and extending slightly into the newly annexed property. The main feature of the arsenic plume that has changed is a reduction in the overall size from the previous three sampling events. Given the reduction in arsenic concentrations at MW-2 since December 2008, the northwest portion of the plume is depicted as having withdrawn somewhat. Based on the historical fluctuations in total arsenic at MW-2, as well as MW-4 and MW-6, the shape of the arsenic plume will continue to evolve over time. However, given the consistent low to non-detectable arsenic levels at MW-8(A) through MW-14, the arsenic plume remains generally static and is confirmed not to be migrating.

Lead Concentrations

Table 3 presents the historical lead concentrations for groundwater samples collected from all fourteen site monitoring wells. The MDEQ's Tier 1 TRG for lead of 0.015 mg/L (also a Federal MCL) has consistently been used for the comparison of lead concentrations detected in the groundwater at this site.

As Table 3 reflects, the only well location that continues to consistently report an exceedance of the Tier 1 TRG for lead is MW-1. The June 2010 sampling event reported a total lead concentration at MW-1 of 0.080 mg/L and a dissolved lead concentration of 0.085 mg/L. All other monitoring wells reported total concentrations that were either less than the Tier 1 TRG or just slightly above the laboratory detection limit of 0.0018 mg/L.

As discussed in previous groundwater monitoring reports, historical data occasionally reported isolated Tier 1 TRG exceedances at MW-4 and MW-6; but as previously documented, the general trend for these two wells has been a gradual decrease and normalization in total lead concentrations. MW-10 reported a lead exceedance during the November 2007 sampling event of 0.020 mg/L; however, the December 2008 and 2009 analytical results reported non-detectable lead concentrations of (<0.0050 mg/L). Given the relatively recent installation of MW-10 (2007) and the subsequent non-detectable lead levels that were reported following the initial excursion, the initial lead exceedance reported at MW-10 seems to be mostly the result of an anomaly caused by entrained sediments captured following in-complete well development. This same conclusion could be applied to the total lead exceedance reported at MW-8 in December 2009, and MW-9 in June 2010. Although the lead concentration of 0.012 mg/L recently reported at MW-9 is below the Tier 1 TRG level, the historical data for this site periodically reports detectable lead concentrations at wells that presumably would not show it. Since the recent detection at MW-9 is below the Tier 1 TRG level, continued monitoring of site conditions in conjunction with seasonal precipitation changes should be consistently evaluated as the most likely culprits for these variations. Figure 5 illustrates the lead iso-concentration lines in the groundwater during the June 2010 sampling event. This figure clearly documents that elevated lead concentrations above the 0.015 mg/L Tier 1 TRG remain within the area of the original fertilizer site; specifically in the area closest to MW-1.

pH Levels

Table 4 records the historical pH levels that have been measured at each of the site monitoring wells. Additionally, Figure 6 illustrates the pH contours for data collected during the June 2010 sampling event.

As Figure 6 illustrates that the main area of low pH (pH < 4.0) continues to be reported around MW-1, MW-2 and MW-3. The pH levels recorded during the most recent sampling event showed a slight decrease in approximately one-half of the wells while a slight increase or static situation was reported in the others. The majority of the pH changes were small as previously reported; typically less than one-half to one-quarter of a Standard Unit. Apart from the primary area of depressed pH being located around MW-1, MW-2 and MW-3, the main thing to note with respect to the pH data is general consistency of the data over time. Fluctuations in these values will undoubtedly continue to take place, but as previously pointed out; slight measurable changes in groundwater pH have made no discernable difference in the historical lead or arsenic concentrations across this site.

CONCLUSIONS

The June 2010 sampling event marks the second semi-annual groundwater assessment conducted since the approval of the "Compliance Monitoring Program" in February 2009. A total of four comprehensive sampling events have now been conducted of all 14 site monitoring wells.

As discussed in the previous four Groundwater Monitoring reports, groundwater impacts from lead and arsenic have consistently been shown to remain primarily within the confines of the original 33-acres of the former Gulfport Fertilizer site. Slight adjustments in total arsenic concentrations at MW-2 and MW-6 have previously caused the iso-concentration lines to extend outward (to the west and northwest) slightly into the annexed portion of the property. Given the range of total arsenic concentrations that have been reported at these two wells over the past 10-years, continued arsenic fluctuations at MW-2 and MW-6 will most likely generate slight modifications to the overall iso-concentration configuration over time. The most important aspect of this is the fact that consistent non-detectable or very low arsenic concentrations reported at MW-8 and MW-8(A) through MW-14 confirm that impacts from total arsenic remain mostly within the original 33-acre portion of the property.

In regard to total lead concentrations, the June 2010 analytical data continues to document the non-mobile nature of the lead plume. The primary lead exceedance of the Tier 1 TRG of 0.015 mg/L has always been around MW-1 and continues to be such. In this regard, analytical data from the past four sampling event establish that total lead concentrations in the groundwater are not migrating away from the original fertilizer site, and appear to remain within the same general range of concentrations and in the same general area around MW-1.

Information regarding pH levels that have been recorded during the past four comprehensive sampling events demonstrates additional groundwater data consistency. Although downward

and upward fluctuating trends have been historically recorded, no appreciable changes in the total lead or total arsenic concentrations can be seen as a result of these variations. Since only two sampling events have taken place since the construction of the clay cap in 2009, CCE believes that several additional sampling events will be required before any quantitatively significant observations can be made regarding any potential effects on groundwater chemistry. At this time however, the CAP appears to be functioning as it was designed to function, and the groundwater (potentiometric surface or chemistry) does not appear to be influenced by it.

We apologize for the delay in getting this report to you. However, we look forward to reviewing your comments. Please contact us with any questions.

Very truly yours,
Covington Civil & Environmental, LLC

Lars Larson, P.G.
Senior Geologist

John F. Szabo, P.E.
Principal

ENCLOSURES

cc: Mr. Tony Russell, OPC - MDEQ
Mr. Delma Powell, Hancock Bank

LIST OF TABLES

Table 1
Groundwater Elevations

Historical Groundwater Sampling Events
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	23.61	20.99	21.84	23.35	23.89	25.09	25.51
12/12/2002	26.01	23.11	24.14	25.66	26.26	27.32	27.65
12/5-9/2002	26.37	23.55	24.82	26.06	26.58	27.77	28.26
4/2/2003	25.95	23.39	24.64	25.78	26.20	27.45	27.76
6/12/2003	27.15	25.58	27.00	26.16	27.48	28.35	29.12
9/11/2003	27.03	23.83	25.26	26.20	27.21	28.17	28.82
12/2/2003	25.47	22.92	23.63	25.52	25.72	26.79	26.78
3/4/2004	27.53	24.23	26.02	26.3	27.9	28.37	29.46
2/17/2006	25.86	23.65	24.68	25.78	26.03	27.28	27.19
11/1/2007	26.23	23.65	25.17	26.13	27.00	28.34	28.83
12/9/2008	24.37	21.52	22.41	24.37	24.41	25.79	25.6
12/2/2009	26.07	25.1	25.95	26.22	27.00	28.39	28.27
6/14-15/2010	25.59	23.12	24.38	25.43	26.34	27.79	28.03
Max. Elevation	27.53	25.58	27	26.3	27.9	28.37	29.46
Min. Elevation	23.61	20.99	21.84	23.35	23.89	25.09	25.51
Head Fluctuation	3.92	4.59	5.16	2.95	4.01	3.28	3.95
POT Average	26.12	23.49	24.72	25.69	26.43	27.49	27.94

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
11/1/2007	19.21	18.45	22.39	19.25	24.22	26.56	28.88
12/9/2008	18.47	15.11	20.39	17.42	21.02	24.66	25.89
12/2/2009	19.89	19.31	22.49	19.96	24.61	27.85	29.01
6/14-15/2010	19.1	17.69	21.94	18.88	23.69	26.06	28.33
Max. Elevation	19.21	18.45	22.39	19.25	24.22	26.56	28.88
Min. Elevation	18.47	15.11	20.39	17.42	21.02	24.66	25.89
Head Fluctuation	0.74	3.34	2.0	1.83	3.2	1.9	2.99
POT Average	19.17	17.64	21.80	18.88	23.39	26.28	28.03

Note: All groundwater elevations in feet, mean sea level (ft., msl).
Monitoring Wells 8 through 14 were installed in October 2007.
MW-8(A) was installed in May 2010 as a replacement of MW-8. Consequently, water level elevations from June 2010 and all subsequent dates are reflective of MW-8(A).

Table 2

Arsenic Concentrations

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	<0.010	0.064	0.011	0.035	<0.010	0.016	<0.010
1-Duplicate	0.018			<0.010	<0.010		
12/12/2002	<0.010	0.073	<0.010	<0.010	<0.010	0.061	<0.010
2-Duplicate		0.095	<0.010	0.039	<0.010	0.041	
12/5-9/2002	0.018	0.052	<0.010	0.048	<0.010	0.030	0.017
3-Duplicate				0.050		0.034	
4/2/2003	<0.010	0.031	<0.010	0.019	<0.010	<0.010	<0.010
4-Duplicate	<0.010	0.051	<0.010	0.016	<0.010	<0.010	0.014
6/12/2003	0.021	0.019	<0.010	0.057	<0.010	0.032	0.011
5-Duplicate	0.018	0.016	NS	0.050	<0.010	0.031	0.011
9/11/2003	0.012	0.029	<0.010	0.055	<0.010	0.028	<0.010
6-Duplicate	0.022	0.026	0.011	0.053	<0.010	0.032	0.012
12/2/2003	0.030	0.090	0.014	0.050	<0.010	0.028	0.014
7-Duplicate	0.022	0.089	<0.010	0.047	<0.010	0.024	0.012
3/4/2004	<0.010	0.100	<0.010	0.053	<0.010	0.025	<0.010
8-Duplicate	0.012	0.082	<0.010	0.042	<0.010	0.018	<0.010
2/17/2006	0.017	0.100	0.012	0.049	<0.010	0.028	0.010
9-Duplicate						0.027	
11/1/2007	0.052	0.064	0.015	0.035	0.011	0.024	0.018
10-Duplicate		0.063					0.019
12/9/2008	0.044	0.079	0.022	0.012	<0.010	0.024	0.017
11-Duplicate							0.017
12/2/2009	0.038	0.024	0.014	0.013	<0.0010	0.026	0.013
12-Duplicate		0.025					
6/14-15/2010	0.053	0.014	<0.010	0.019	<0.010	0.022	0.011
13-Duplicate	0.053						
Average	0.024	0.060	0.014	0.042	0.011	0.030	0.014
Sampling Date	**MW-8 & MW-8(A)**	**MW-9**	**MW-10**	**MW-11**	**MW-12**	**MW-13**	**MW-14**
11/1/2007	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
10-Duplicate	<0.010					<0.010	
12/9/2008	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
11-Duplicate						<0.010	
12/2/2009	0.029	0.0014	0.0012	0.0018	0.0026	<0.0010	<0.0010
12-Duplicate						<0.0010	
6/14-15/2010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
13-Duplicate						<0.010	
Average							

Notes:

1. All arsenic concentrations in mg/l.
2. Arsenic concentrations in bold represent positive detections above the laboratory detection limit.
3. Arsenic concentrations exceeding MDEQ Tier 1 Groundwater MCL for arsenic (0.010 mg/l) are shaded.

Table 3
Lead Concentrations

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	0.020	0.0074	0.0087	0.016	<0.0050	<0.0050	<0.0050
1-Duplicate	0.015			0.014	<0.0050		
12/12/2002	0.014	<0.0050	<0.0050	0.0053	0.012	0.017	0.0062
2-Duplicate		0.011	0.011	0.016	0.011	0.014	
12/5-9/2002	0.023	0.0095	0.0076	0.0066	<0.0050	<0.0050	<0.0050
3-Duplicate				0.0056		<0.0050	
4/2/2003	0.023	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
4-Duplicate	0.022	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
6/12/2003	0.027	0.0094	0.011	0.014	0.0063	0.0071	<0.0050
5-Duplicate	0.019	0.0083	NS	0.013	0.0069	0.0074	0.0051
9/11/2003	0.029	0.011	0.010	0.014	<0.0050	0.0087	0.0068
6-Duplicate	0.028	0.013	0.0092	0.015	0.0086	0.0098	0.0062
12/2/2003	0.0072	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
7-Duplicate	0.0068	<0.0050	<0.0050	<0.0050	0.0058	<0.0050	<0.0050
3/4/2004	0.042	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
8-Duplicate	0.042	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
2/17/2006	0.009	0.0057	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
9-Duplicate						<0.0050	
11/1/2007	0.066	<0.0050	<0.0050	0.014	<0.0050	<0.0050	<0.0050
10-Duplicate		0.0051					<0.0050
12/9/2008	0.071	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate							<0.0050
12/2/2009	0.048	0.0040	0.0012	0.0028	0.0017	0.0055	<0.0010
12-Duplicate		0.0039					
6/14-15/2010	0.080	0.0042	<0.0018	<0.0018	<0.0018	<0.0018	<0.0018
13-Duplicate	0.078						
Average	0.025	0.009	0.010	0.012	0.008	0.011	0.006

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
11/1/2007	<0.0050	<0.0050	0.02	<0.0050	<0.0050	<0.0050	<0.0050
10-Duplicate	<0.0050					<0.0050	
12/9/2008	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate						<0.0050	
12/2/2009	0.12	<0.0010	<0.0010	<0.0010	0.0069	<0.0010	<0.0010
12-Duplicate						<0.0010	
6/14-15/2010	<0.0018	0.012	<0.0018	0.0081	0.0044	<0.0018	<0.0018
13-Duplicate						<0.0018	

Notes:

1. All lead concentrations in mg/l.
2. Lead concentrations in bold represent positive detections above the laboratory detection limit.
3. Lead concentrations exceeding MDEQ Tier 1 Groundwater MCL for lead (0.015 mg/l) are shaded

Table 4
pH Readings

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	3.22	3.95	3.96	4.41	5.06	5.41	6.23
12/12/2002	3.24	3.94	4.04	4.46	4.93	5.86	6.33
12/5-9/2002	3.26	3.91	3.98	4.43	5.06	5.70	6.40
4/2/2003	3.25	4.15	4.02	4.32	4.98	5.88	6.39
6/12/2003	3.10	3.75	3.83	4.08	4.70	5.90	6.09
9/11/2003	3.16	3.99	3.88	4.18	4.45	5.83	6.24
12/2/2003	3.34	3.96	4.08	4.45	4.77	5.62	6.47
3/4/2004	3.24	3.85	3.92	4.27	4.46	5.90	6.35
2/17/2006	3.27	3.86	3.75	4.74	4.63	6.21	6.20
11/1/2007	3.23	3.64	3.6	4.35	4.77	5.84	6.23
12/9/2008	3.20	3.56	3.71	4.44	4.95	5.76	6.21
12/2/2009	2.96	3.06	3.16	4.08	4.86	5.61	5.75
6/14-15/2010	2.76	3.20	3.26	4.06	4.75	5.55	5.76
pH Average	**3.17**	**3.76**	**3.78**	**4.33**	**4.80**	**5.77**	**6.20**

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
11/1/2007	5.11	4.5	4.21	4.09	6.01	4.1	4.36
12/9/2008	5.04	5.01	4.24	4.41	5.97	4.04	4.10
12/2/2009	4.85	4.42	3.18	3.72	3.97	3.72	3.79
6/14-15/2010	4.46	4.14	3.71	3.44	4.38	4.04	3.78
pH Average	**5.08**	**4.76**	**4.23**	**4.25**	**5.99**	**4.07**	**4.23**

Notes:

1. All pH readings are expressed in standard units.

LIST OF FIGURES

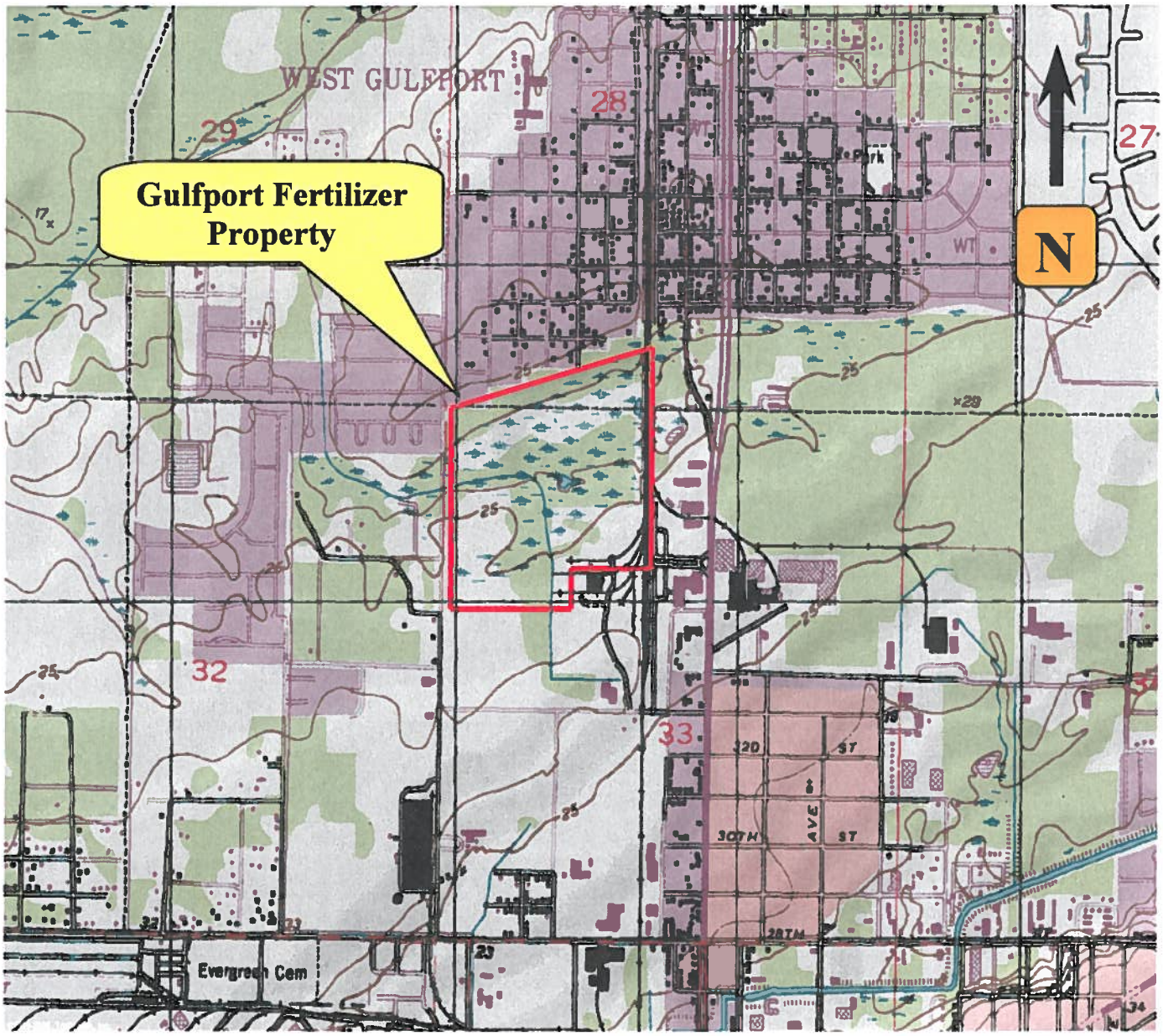


Figure 1 - Site Location Map
Gulfport Fertilizer Site
U.S.G.S. 7.5-Minute Quadrangle Map
Gulfport North, Mississippi
1994
CAC Project # 9397

LEGEND

MW-8A GROUNDWATER MONITORING WELL LOCATION

ABANDONED GROUNDWATER MONITORING WELL(LOCATION NOT TO SCALE)

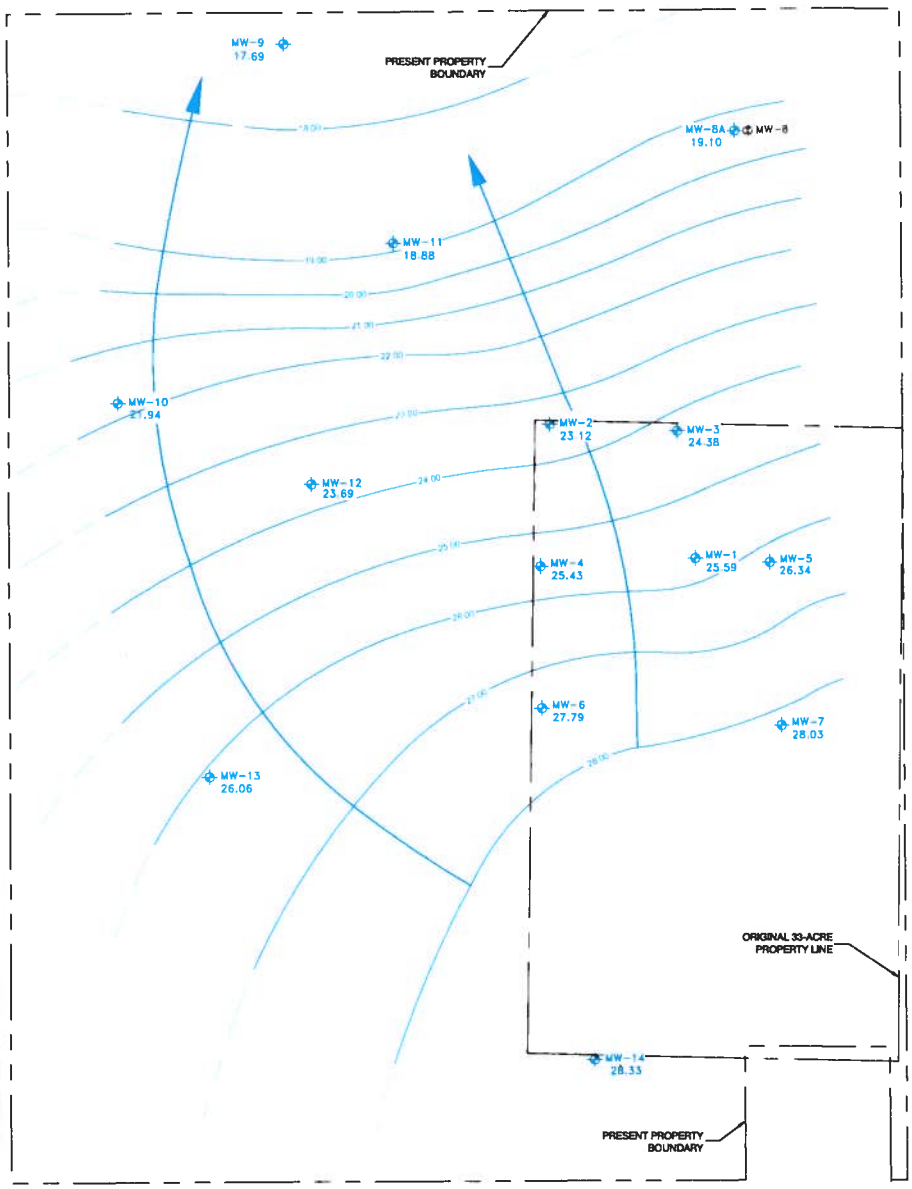
300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
14257 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone (228) 396-0486 | Fax (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS
Monitoring Well Location Map

DATE 08-11-10
SCALE 1" = 300'
PROJECT NO 9397
FILE:
FIGURE 2



LEGEND

MW-8A — GROUNDWATER MONITORING WELL LOCATION

MW-8 — ABANDONED GROUNDWATER MONITORING WELL(LOCATION NOT TO SCALE)

19.10 — GROUNDWATER ELEVATION IN FEET (REFERENCED TO MEAN SEA-LEVEL)

GROUNDWATER POTENTIOMETRIC CONTOUR (DASHED WHERE INFERRED)

300 0 300 600 900

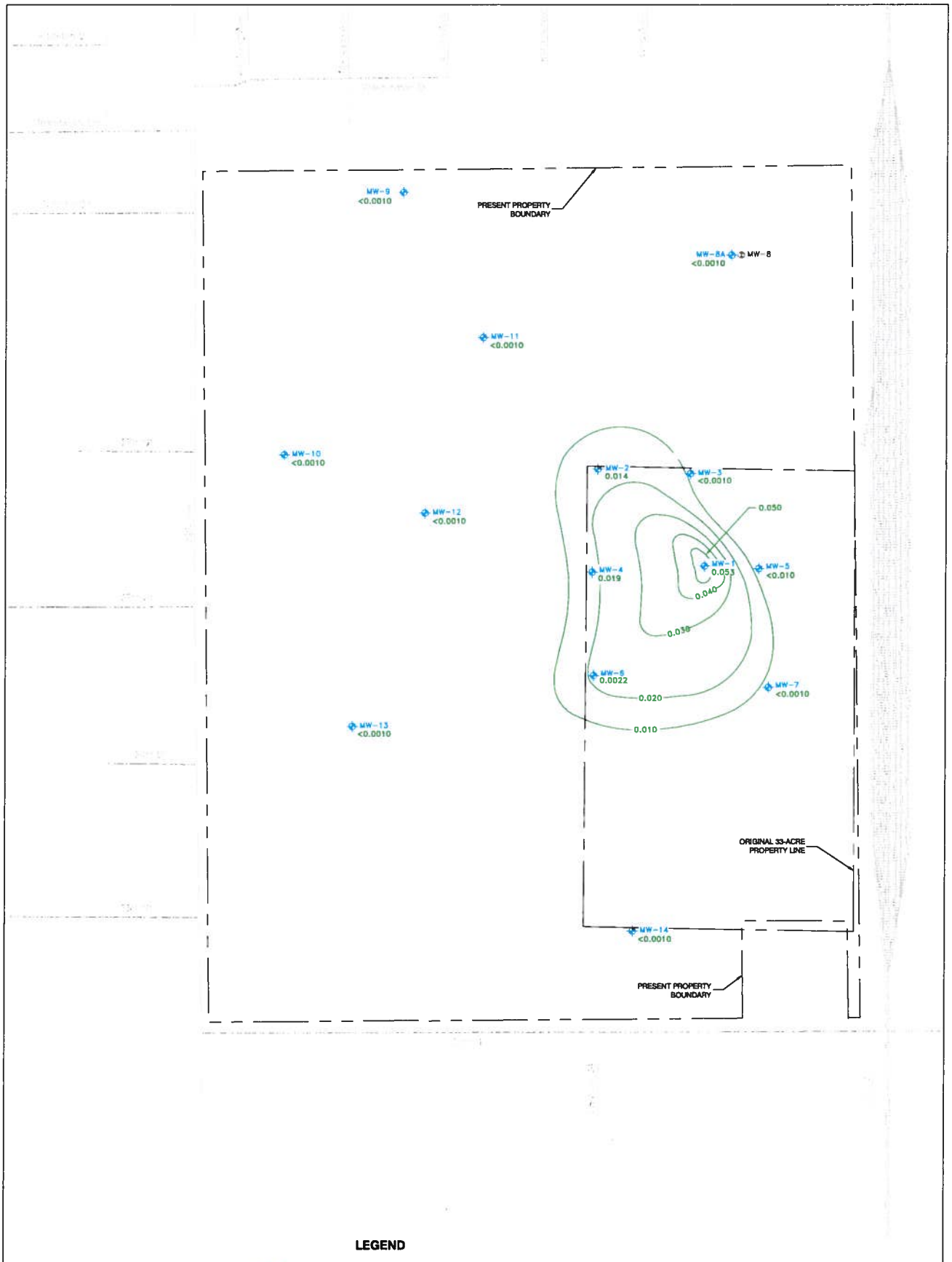
GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
14257 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

Potentiometric Surface Map
June 14-15, 2010

DATE: 08/16/10
SCALE: 1" = 300'
PROJECT NO: 9397
FILE:
FIGURE: 3



LEGEND

MW-8A GROUNDWATER MONITORING WELL LOCATION

MW-8 ABANDONED GROUNDWATER MONITORING WELL(LOCATION NOT TO SCALE)

<0.0010 TOTAL ARSENIC CONCENTRATION IN GROUNDWATER IN mg/L

ARSENIC ISO-CONCENTRATION CONTOUR

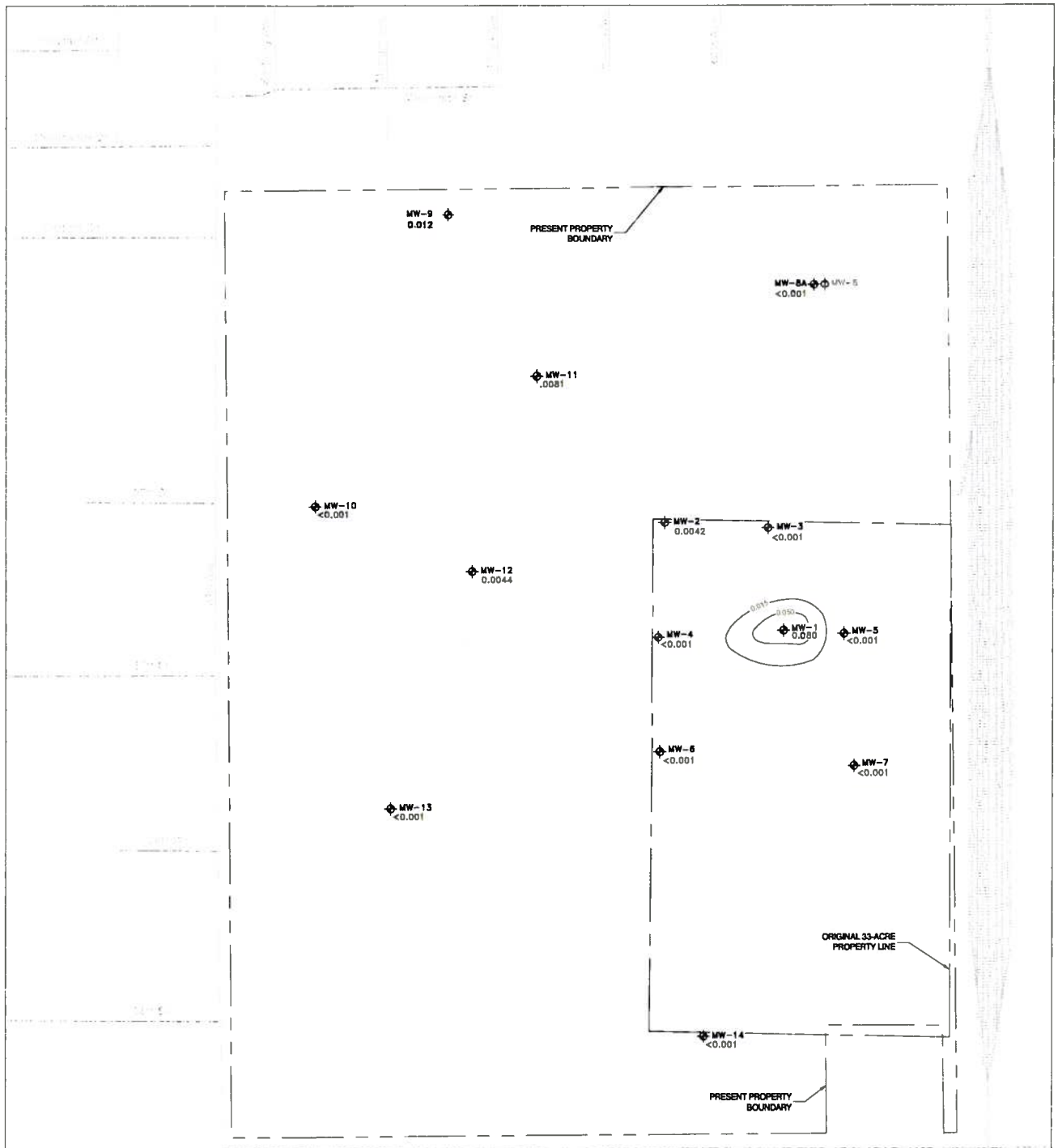
300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
14257 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone: (228) 396-0488 | Fax: (228 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS
Arsenic Iso-Concentration Map
June 14-15, 2010

DATE: 08/16/10
SCALE: 1" = 300'
PROJECT NO: 0397
FILE:
FIGURE: 4



LEGEND

MW-8A ⊕ GROUNDWATER MONITORING WELL LOCATION

MW-8 ⊕ ABANDONED GROUNDWATER MONITORING WELL(LOCATION NOT TO SCALE)

<0.001 TOTAL LEAD CONCENTRATION IN GROUNDWATER IN mg/L

LEAD ISO-CONCENTRATION CONTOUR

300 0 300 600 900

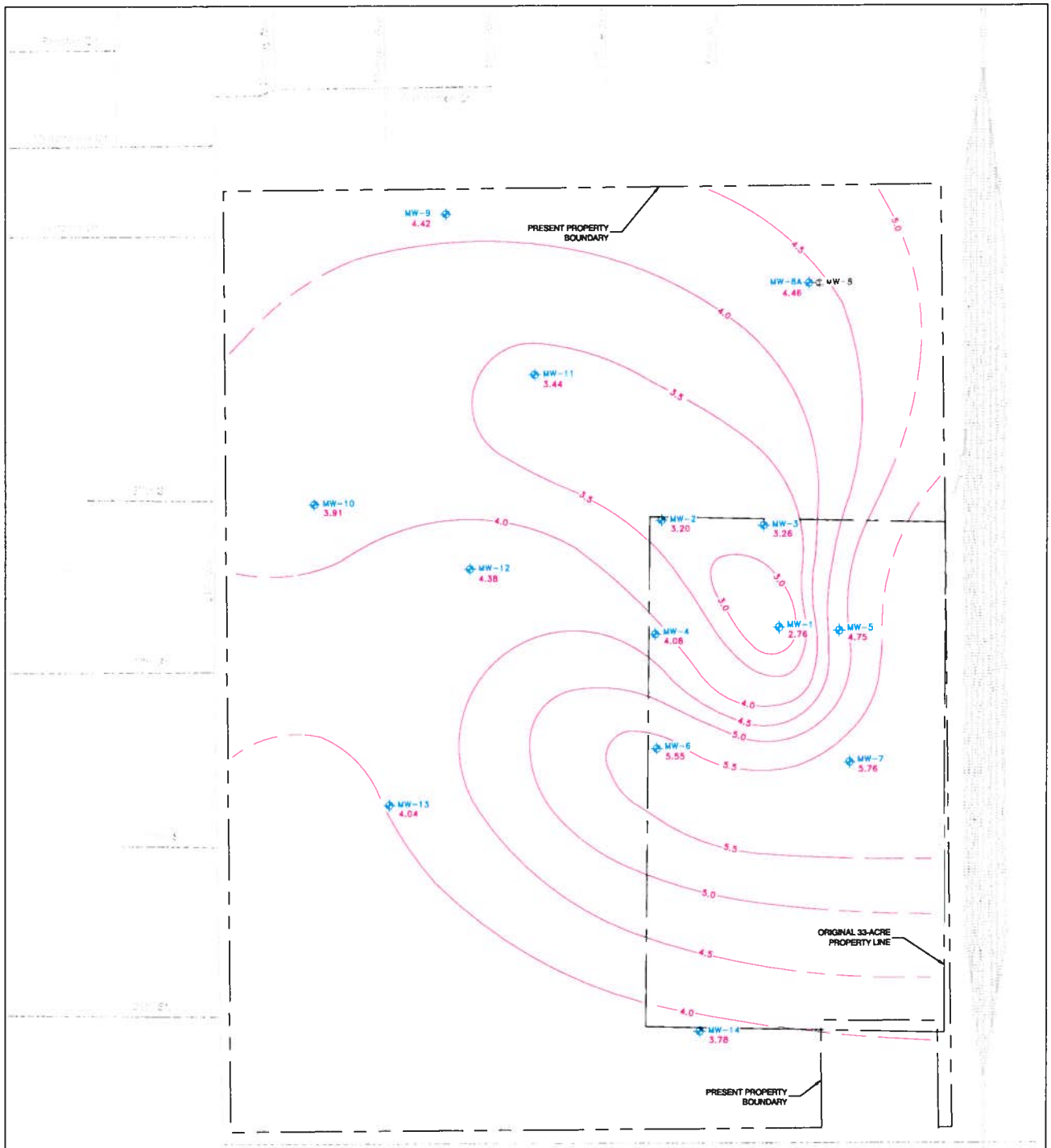
GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
14237 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

Lead Iso-Concentration Map
June 14-15, 2010

DATE: 08/17/10
SCALE: 1" = 300'
PROJECT NO: 0397
FILE: C:\CAD...
FIGURE: 5



LEGEND

MW-8A GROUNDWATER MONITORING WELL LOCATION

MW-8 ABANDONED GROUNDWATER MONITORING WELL(LOCATION NOT TO SCALE)

4.46 pH VALUES EXPRESSED IN STANDARD UNITS

pH ISO-CONCENTRATION CONTOUR (DASHED WHERE INFERRED)

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
14257 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS
pH Contour Map
June 14-15, 2010

DATE: 08/16/10
SCALE: 1" = 300'
PROJECT NO. 9397
FILE: G:\CAD\...\GULFPORT FERTILIZER\COUNTY_EXTCONTOUR\EXTCONTOUR0610.DWG 03-15
FIGURE: 6

APPENDIX A

Well Sampling Field Data Sheets

Step 1
① Measure Waterlevel
② Calculate Water Level elevation
Water Level - Top of Casing
③ Calculate water column
Water Level elevation - Bottom of Screen
④ Calculate purge volume

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/14/10	CAC Project No. 9397	City: Gulfport	
Sampler:	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet) ②	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet) ①	Water Level Elevation (Feet) ③	Water Column (Feet) ④
MW-1	4"	32.43	29.35	27.26	17.26	6.84	25.59	8.17

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		1" Well		4" Well	
Well Multiplier:	0.023	Well Multiplier:	0.041	Well Multiplier:	0.653
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	5.35
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	16.06

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU) Hori. / MicroTPI
11:54	Purge							
12:25	29'	8	23.3	0.124	0.31	2.71	430	0.0 / 3.92
12:30		8.5	23.5	0.118	0.32	2.74	421	0.0 / 7.50
12:35		9	23.8	0.120	0.32	2.76	418	0.0 / 3.37
12:40		9.5	23.8	0.122	0.31	2.76	417	0.1 / 4.39
12:45		10	23.8	0.125	0.31	2.76	417	0.1 / 3.36
12:50		10.5	23.7	0.125	0.31	2.75	416	0.1 / 3.88
12:55		11	23.7	0.126	0.30	2.75	416	0.1 / 4.24
13:00		11.5	23.8	0.127	0.29	2.76	415	0.0 / 2.60
13:05	Sample - Dup I			taken @ MW1 @ 13:05				

Signature of Field Technician:

Start purge @ 11:54

NOTE - MW-1 Casing modified (extend up) in Oct 2007. TOC elevation noted on this data sheet reflects "newly" surveyed modification

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6.15.10	CAC Project No. 9397	City: Gulfport	
Sampler: L.L. / R.H.	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-2	2"	28.75	25.89	20.95	10.95	5.63	23.12	12.17

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	1.98	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.95	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU) Horiba	Field Turbidity (NTU) Micro-TPI
06:20	5.5	Purge -							~~26~~
06:35	6.0		21.6	30.0	1.41	3.33	322	965	26.5
06:39	6.5		21.6	49.1	1.12	3.28	326	893	4.32
06:43	7.0		21.6	61.9	1.01	3.24	329	863	1.45
06:47	7.5		21.6	61.9	0.92	3.22	330	887	0.91
06:51	8.0		21.6	56.7	0.86	3.21	331	856	0.01
06:55	8.5		21.6	57.1	0.84	3.20	331	0.0	0.01
06:57	SAMPLE -								

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6.14.10	CAC Project No. 9397	City: Gulfport	
Sampler: L.Li	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-3	2"	30.26	27.46	21.32	11.32	5.88	24.38	15.06

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	2.12	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.39	Min. Volume to be Purged (Gallons):	

Purging Methodology:

Sampling Information

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
15:38								
15:50			22.0	29.9	0.78	3.41	243	0.1 / 6.34
15:54			22.0	29.9	0.58	3.31	250	0.0 5.12
15:58			21.9	29.8	.50	3.26	251	0.0 4.66
16:02			22.0	29.9	.49	3.25	258	0.0 2.38
16:06			22.1	29.6	.48	3.26	257	0.0 2.46
16:10	Sample							

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/15/10	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-4	2"	28.28	25.93	20.40	10.40	~~5.76~~ 2.85	~~28.13~~ 25.43	~~22.37~~ 15.03

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	~~3.64~~ 2.45	Well Volumes = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	~~10.92~~ 7.36	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)	Micro TPI (NTU)
~~6:12~~									
~~15:38~~	to		~~22.0~~	~~21.4~~	~~0.66~~	~~4.57~~	~~268~~	~~0.1~~	~~0.15~~
07:05	Start Purge								
07:15	5.0		21.2	60.5	3.12	3.99	172	945	0.94
07:19	5.5		21.2	59.9	1.02	4.05	127	0.0	0.01
07:23	6.0		21.1	57.7	0.54	4.08	105	0.0	0.01
07:27	6.5		21.2	60.1	0.43	4.04	92	0.0	0.01
07:31	7.0		21.4	62.1	0.39	4.00	90	0.0	0.01
07:35	7.5		21.5	61.8	0.37	4.06	91	0.0	
07:40	SAMPLE								

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6.14.16	CAC Project No. 9397	City: Gulfport	
Sampler: L.L.	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-5	2"	32.10	29.25	23.19	10.19	5.76	26.34	13.15

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	2.14	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.43	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU) Horiba / MicroTPI
13:12								
13:28	6		22.2	31.9	0.66	4.57	268	0.1 / 10.18
13:35	6.5		22.1	33.8	0.38	4.70	240	0.0 / 4.09
13:40	7.0		22.1	33.9	0.35	4.71	237	0.0 / 3.28
13:45	7.5		22.4	33.8	0.34	4.73	235	0.0 / 2.54
13:49	8.0		22.7	34.4	0.33	4.74	231	0.0 / 3.24
13:53	8.5		22.7	34.3	0.32	4.74	230	0.0 / 2.53
13:57	9.0		22.7	34.9	0.32	4.75	228	0.0 / 3.90
X 13:59	SAMPLE							

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6-14-10	CAC Project No. 9397	City: Gulfport	
Sampler: L.L.	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-6	2"	34.29	31.23	25.34	15.34	6.50	27.79	12.45

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	2.03	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.09	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
14:52	0							
15:05	~~5~~	2.5	21.1	75.6	.80	5.62	40	~~50~~ 17
15:09	~~10~~	3.0	21.3	68.1	.42	5.54	11	5
15:13		3.5	21.1	69.0	~~.59~~	5.54	3	4
15:17		4.0	21.1	76.3	.38	5.54	3	3
15:21		~~5.0~~	21.1	69.9	.31	5.52	7	3
15:23		~~5.5~~	21.2	69.0	.25	5.55	11	4
15:25		6.0	21.1	9.80	.24	5.55	13	4

Sample @

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6.14.10	**CAC Project No.** 9397	**City:** Gulfport	
Sampler: L.L.	**CAC Project Description:** Gulfport Fertilizer Site	**State:** MS	

Field Equipment

pH Meter No.	**Serial No.**
Conductivity Meter No.	**Serial No.**
Turbidity Meter No.	**Serial No.**

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-7	2"	33.48	30.75	24.54	14.54	5.45	28.03	13.49

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.19	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min Volume to be Purged (Gallons):	2.19 6.59	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU) Hach 2100P / MicroTPI
14:07								
14:17	10		22.3	50.6	0.41	5.70	66	0.0 / 27.24
14:21			22.2	49.1	0.35	5.72	61	0.0 / 17.24
14:25			22.2	48.7	0.29	5.74	52	0.0 / 8.96
14:29			22.2	47.6	0.24	5.75	45	0.0 / 12.12
14:33			22.1	47.1	0.21	5.75	41	0.1 / 4.89
14:37			22.1	46.6	0.19	5.76	38	0.0 / 1.52
* 14:38	SAMPLE							

Signature of Field Technician:

872 3096
225. 291- 6306
Enviro Depot
Michael

MW-8A → Need Elevation

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/15/2010	CAC Project No.	9397	City: Gulfport
Sampler: RH/LL	CAC Project Description:	Gulfport Fertilizer Site	State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-8 A	2"	~~22.54~~ 22.58		15.20	5.20	3.48	~~19.06~~ 19.1	~~13.86~~ 13.9

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	13.90	Well Volumes = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.3	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.9	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Problem w/ old Pump → Replaced w/ New

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
~~1214~~ 1214	0	0						
~~1218~~ 1220		2.5	20.1	16.3	.64	4.41	~~47~~	10
1225		3.0	20.1	21.5	.57	4.40	42	8
1228		3.5	20.2	25.4	.48	4.41	36	6
1230		4.0	20.1	52.8	.43	4.02	34	5
1232		4.5	20.2	40.8	.41	4.03	30	5
1234		5.0	20.1	79	.34	4.05	28	5
1236 → Collect Samples		5.5	20.1	22	.36	4.06	26	5
		~~6.0~~						

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/16/2010	CAC Project No. 9397	City:	Gulfport
Sampler: TA/CL	CAC Project Description: Gulfport Fertilizer Site	State:	MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-9	2"	22.64		16.13	6.13	4.95	17.69	11.56

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.56	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.88	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.6	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU) Horiba	Field Turbidity (NTU) MicroTPI
12:48	0	0							
12:54		2.0	23.0	0.126	0.71	4.06	106	974	51.88
12:57		2.5	23.6	0.115	1.43	3.61	140	913	22.65
13:00		3.0	23.0	0.128	0.63	3.76	118	887	6.38
13:03		3.5	22.6	0.130	0.48	3.81	108	898	5.13
13:06		4.0	22.2	0.131	0.39	3.92	89	897	7.68
13:08		0.5	22.2	0.131	0.37	3.99	77	538	4.09
13:10		5.0	22.0	0.132	0.36	4.04	65	0.1	3.66
13:12		5.5	22.0	0.132	0.33	4.09	53	0.0	3.07
13:14		6.0	22.0	0.132	0.32	4.14	44	0.0	3.99
* 13:16	SAMPLE								

(NTU)

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/15/10	CAC Project No. 9397	City:	Gulfport
Sampler: RH/LL	CAC Project Description: Gulfport Fertilizer Site	State:	MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-10	2"	27.69		19.73	9.73	5.75	21.94	12.21

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	12.21	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.99	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.0	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
1435		0						
1443		2.0	21.4	7.4	2.24	3.78	236	156
1448		3.0	21.7	8.0	1.55	3.75	252	53
1449		3.5	21.8	10.5	1.23	3.74	262	28
1452		4.0	21.9	7.3	1.11	3.72	270	18
1455		4.5	21.9	7.3	1.03	3.71	276	11
1458		5.0	21.9	7.1	1.00	3.71	284	9
1501		5.5	21.9	7.1	0.98	3.71	288	8
1503								
→ collected Sample								

Signature of Field Technician:

23
MW-12

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6-15-10	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-11	2"	22.85		15.05	5.05	3.97	18.88	13.83

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	2.25	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.76	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU) Horiba	Field Turbidity (NTU) Micro	TPI (NTU)
13:22										
13:27	2.0		20.8	0.100	0.48	3.85	100	837	7.24	
13:31	2.5		20.9	0.102	0.51	3.58	115	932	4.12	
13:34	3.0		21.1	0.104	1.23	3.02	163	986	3.65	
13:36	3.5		21.2	0.104	1.48	2.94	178	900	3.79	
13:38	4.0		21.3	0.105	1.60	2.91	183	874	4.00	
13:40	4.5		21.3	0.104	1.44	2.99	170	878	3	
13:42	5.0		21.2	0.101	0.85	3.22	136	873	1	
13:44	5.5		21.1	0.100	0.66	3.35	125	673	1	
13:46	6.0		21.1	0.100	0.45	3.44	114	867	1	
* 13:48	SAMPLE									

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/15/10	CAC Project No. 9397	City: Gulfport	
Sampler: LL/RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-12	2"	28.92		20.95	10.95	5.23	23.69	12.74

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.08	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.23	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU) Hanna	Field Turbidity (NTU) Micro	TPI (NTU)
13:54										
14:02	2.0		23.2	11.6	0.40	4.39	54	0.0	305	
14:04	2.5		23.0	11.6	0.37	4.39	50	0.0	307	
14:06	3.0		23.1	12.4	0.37	4.40	46	0.0	350	
14:08	3.5		23.0	14.4	0.35	4.39	46	0.0	310	
14:10	4.0		23.0	17.9	0.35	4.38	45	0.0	310	
14:12	4.5		22.9	19.2	0.34	4.38	44	0.0	307	
14:14	5.0		22.9	22.1	0.32	4.39	41	0.0	316	
14:16	5.5		22.9	21.0	0.31	4.38	40	0.0	320	
14:18	6.0		22.8	20.1	0.30	4.38	38		320	
* 14:20	SAMPLE									

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6-15-10	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-13	2"	32.36		24.30	14.30	10.30	26.06	11.76

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	1.92	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.75	Min. Volume to be Purged (Gallons):	

Purging Methodology:

Sampling Information

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU) Hori-Lab	Field Turbidity (NTU) Micro TPI
08:15									
8:30	15	2.5	23.3	22.3	.98	4.56	219	11	
08:33		3.0	23.2	23.5	0.81	4.37	238	766	8.04
08:35		3.5	23.2	20.8	0.77	4.25	244	659	3.77
08:39		4.0	23.2	17.0	0.77	4.11	257	116	4.63
08:42		4.5	23.1	13.5	0.77	4.08	257	0.0	6.0
08:45		5.0	23.1	7.5	0.77	4.03	252	0.0	5.91
08:46		5.5	23.1	7.3	0.77	4.04	249	0.0	5.74
08:48	SAMPLE								
	*DUP-2 taken @ MW-13 @ 08:48					6.15.10			

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6.15.10	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-14	2"	34.08		25.83	15.83	5.75	28.33	12.5

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	12.5	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.0	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.1	Min. Volume to be Purged (Gallons):	

Purging Methodology:

Sampling Information

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)	Micro PTI (NTU)
9:08		0							
9:10		2.5	22.1	8.4	4.97	3.82	303	761	4.08
9:13		3.0	22.2	8.1	4.84	3.80	306	751	3.67
9:16		3.5	22.2	7.8	4.60	3.80	309	671	2.82
9:19		4.0	22.2	7.4	4.49	3.78	310	0.0	2.89
9:22		4.5	22.2	7.3	4.32	3.78	313	0.0	2.20
9:24		5.0	22.2	7.3	4.32	3.78	315	0.0	2.22
9:26		5.5	22.1	7.3	4.26	3.78	315	0.1	1.46
9:28	SAMPLE								

Signature of Field Technician: RH

APPENDIX B

Laboratory Analytical Report Sheets and

Chain-Of-Custody Forms

ESC
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Est. 1970

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

Report Summary

Thursday July 15, 2010

Report Number: L464524
Samples Received: 06/16/10
Client Project: 9397.00

Description: Gulfport Fertillzer

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Craig Cothron , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - I-2327, CT - PH-0197, FL - E87487
GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704, ND - R-140
NJ - TN002,NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032008A

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.
Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-01

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-13

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 08:48

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/18/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/21/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/18/10	1
Lead,Dissolved	0.0046	0.0018	0.0050	mg/l	J	6010B	06/21/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-02

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-14

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 09:28

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/18/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/21/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/18/10	1
Lead,Dissolved	0.0091	0.0018	0.0050	mg/l		6010B	06/21/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-03

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-8A

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 12:36

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/18/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/18/10	1
Lead,Dissolved	U	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-04

Site ID :

Project # : 9397.00

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Sample ID : MW-9

Collected By :
Collection Date : 06/15/10 13:14

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/18/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	0.012	0.0018	0.0050	mg/l		6010B	06/18/10	1
Lead,Dissolved	0.0080	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-05

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-11

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 13:48

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/18/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	0.0081	0.0018	0.0050	mg/l		6010B	06/18/10	1
Lead,Dissolved	0.015	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-06

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-12

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 14:20

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/18/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	0.0044	0.0018	0.0050	mg/l	J	6010B	06/18/10	1
Lead,Dissolved	U	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-07

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-10

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 15:03

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/18/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/18/10	1
Lead,Dissolved	0.0032	0.0018	0.0050	mg/l	J	6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-08

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : DUP-2

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 00:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/22/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/22/10	1
Lead,Dissolved	U	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-09

Site ID :

Project # : 9397.00

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Sample ID : MW-1

Collected By :
Collection Date : 06/14/10 13:05

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	0.053	0.0065	0.020	mg/l		6010B	06/22/10	1
Arsenic,Dissolved	0.010	0.0065	0.020	mg/l	J	6010B	06/23/10	1
Lead	0.080	0.0018	0.0050	mg/l		6010B	06/22/10	1
Lead,Dissolved	0.085	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/15/10 09:34 Printed: 07/15/10 09:39

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-10

Site ID :

Project # : 9397.00

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Sample ID : MW-5

Collected By :
Collection Date : 06/14/10 13:59

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/22/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/22/10	1
Lead,Dissolved	U	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/15/10 09:34 Printed: 07/15/10 09:39

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-11

Site ID :

Project # : 9397.00

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Sample ID : MW-7

Collected By :
Collection Date : 06/14/10 14:38

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	0.011	0.0065	0.020	mg/l	J	6010B	06/22/10	1
Arsenic,Dissolved	0.010	0.0065	0.020	mg/l	J	6010B	06/23/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/22/10	1
Lead,Dissolved	U	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
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REPORT OF ANALYSIS

July 15, 2010

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

ESC Sample # : L464524-12

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-6

Project # : 9397.00

Collected By :
Collection Date : 06/14/10 15:25

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	0.022	0.0065	0.020	mg/l		6010B	06/22/10	1
Arsenic,Dissolved	0.019	0.0065	0.020	mg/l	J	6010B	06/23/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/22/10	1
Lead,Dissolved	U	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
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The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-13

Site ID :

Project # : 9397.00

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Sample ID : MW-3

Collected By :
Collection Date : 06/14/10 16:10

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	U	0.0065	0.020	mg/l		6010B	06/22/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/22/10	1
Lead,Dissolved	0.0031	0.0018	0.0050	mg/l	J	6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/15/10 09:34 Printed: 07/15/10 09:39

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

July 15, 2010

ESC Sample # : L464524-14

Site ID :

Project # : 9397.00

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Sample ID : DUP-1

Collected By :
Collection Date : 06/14/10 00:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	0.053	0.0065	0.020	mg/l		6010B	06/22/10	1
Arsenic,Dissolved	0.0075	0.0065	0.020	mg/l	J	6010B	06/23/10	1
Lead	0.078	0.0018	0.0050	mg/l		6010B	06/22/10	1
Lead,Dissolved	0.090	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
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Reported: 07/15/10 09:34 Printed: 07/15/10 09:39

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L·A·B S·C·I·E·N·C·E·S
YOUR LAB OF CHOICE

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

July 15, 2010

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

ESC Sample # : L464524-15

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-2

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 06:57

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	0.014	0.0065	0.020	mg/l	J	6010B	06/22/10	1
Arsenic,Dissolved	U	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	0.0042	0.0018	0.0050	mg/l	J	6010B	06/22/10	1
Lead,Dissolved	0.015	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/15/10 09:34 Printed: 07/15/10 09:39

ESC
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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

July 15, 2010

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

ESC Sample # : L464524-16

Date Received : June 16, 2010
Description : Gulfport Fertillzer

Site ID :

Sample ID : MW-4

Project # : 9397.00

Collected By :
Collection Date : 06/15/10 07:40

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	0.019	0.0065	0.020	mg/l	J	6010B	06/22/10	1
Arsenic,Dissolved	0.013	0.0065	0.020	mg/l	J	6010B	06/23/10	1
Lead	U	0.0018	0.0050	mg/l		6010B	06/22/10	1
Lead,Dissolved	0.0071	0.0018	0.0050	mg/l		6010B	06/23/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/15/10 09:34 Printed: 07/15/10 09:39

Attachment A
List of Analytes with QC Qualifiers

Sample Number	Work Group	Sample Type	Analyte	Run ID	Qualifier
L464524-01	WG484566	SAMP	Lead,Dissolved	R1260890	J
L464524-06	WG483934	SAMP	Lead	R1258011	J
L464524-07	WG484606	SAMP	Lead,Dissolved	R1264588	J
L464524-09	WG484606	SAMP	Arsenic,Dissolved	R1264588	J
L464524-11	WG484127	SAMP	Arsenic	R1263208	J
	WG484606	SAMP	Arsenic,Dissolved	R1264588	J
L464524-12	WG484606	SAMP	Arsenic,Dissolved	R1264588	J
L464524-13	WG484606	SAMP	Lead,Dissolved	R1264588	J
L464524-14	WG484606	SAMP	Arsenic,Dissolved	R1264588	J
L464524-15	WG484127	SAMP	Arsenic	R1263208	J
	WG484127	SAMP	Lead	R1263208	J
L464524-16	WG484127	SAMP	Arsenic	R1263208	J
	WG484606	SAMP	Arsenic,Dissolved	R1264588	J

Attachment B
Explanation of QC Qualifier Codes

Qualifier	Meaning
J	(EPA) - Estimated value below the lowest calibration point. Confidence correlates with concentration.

Qualifier Report Information

ESC utilizes sample and result qualifiers as set forth by the EPA Contract Laboratory Program and as required by most certifying bodies including NELAC. In addition to the EPA qualifiers adopted by ESC, we have implemented ESC qualifiers to provide more information pertaining to our analytical results. Each qualifier is designated in the qualifier explanation as either EPA or ESC. Data qualifiers are intended to provide the ESC client with more detailed information concerning the potential bias of reported data. Because of the wide range of constituents and variety of matrices incorporated by most EPA methods,it is common for some compounds to fall outside of established ranges. These exceptions are evaluated and all reported data is valid and useable "unless qualified as 'R' (Rejected)."

Definitions

Accuracy - The relationship of the observed value of a known sample to the true value of a known sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, surrogate recoveries, etc.

Precision - The agreement between a set of samples or between duplicate samples. Relates to how close together the results are and is represented by Relative Percent Differrence.

Surrogate - Organic compounds that are similar in chemical composition, extraction, and chromotography to analytes of interest. The surrogates are used to determine the probable response of the group of analytes that are chemically related to the surrogate compound. Surrogates are added to the sample and carried through all stages of preparation and analyses.

TIC - Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.

Covington & Associates

14257-B Dedeaux Road
Gulfport,MS 39503

Billing information:

Mr. Lars Larson
14257-B Dedeaux Road

Gulfport,MS 39503

Report to: Mr. Lars Larson

Email: lars@covingtonassociates.net

Project Description: Gulfport Fertilizer

City/State Collected: Gulfport, MS

Phone: (228) 396-0486
FAX:

Client Project #: 9397.00

Lab Project #: COVASSOC-GULFPORT

Collected by (print):

Site/Facility ID#:

P.O.#:

Collected by (signature):

Immediately Packed on Ice N ___ Y ___

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day.....100%
___ Two Day.....50%
___ Three Day.....25%

Date Results Needed

Email? ___No X Yes
FAX? ___No ___Yes

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	Analysis/Container/Preservative: ASICP / PBICP 500ml HDPE-NoPres	ASICP / PBICP 500ml HDPE-HNO3 <2					Remarks/Contaminant	Sample # (lab only)
MW-13	GRAB	GW	—	6/15/10	848	2	X	X					STAT-L465452	-01
MW-14		GW			928	2	X	X						-02
MW-8(A)		GW			1236	2	X	X						-03
MW-9		GW			1314	2	X	X					L465837	-01 -04
MW-11		GW			1348	2	X	X					02	-05
MW-12		GW			1420	2	X	X						-06
MW-10		GW			1503	2	X	X						-07
DUP-2		GW			—	2	X	X						-08
		GW				2	X	X						

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

Remarks:

pH _____ Temp _____

Flow _____ Other _____

Relinquished by: (Signature) — Date: 6/15/10 Time: 1700 — Received by: (Signature)

Relinquished by: (Signature) — Date: Time: — Received by: (Signature)

Relinquished by: (Signature) — Date: Time: — Received for lab by: (Signature) Date: 6/16/10 Time: 0900

TRK# 4355 9301 7610

Samples returned via: ☐ UPS ☑ FedEx ☐ Courier ☐ ____

Temp: 2.4 Bottles Received: 32

Condition: (lab use only) OK

COC Seal Intact: Y N NA

pH Checked: NCF:

Chain of Custody
Page 1 of 2

ESC LABORATORIES
12065 Lebanon Road
Mt. Juliet, TN 37122

Phone: (800) 767-5859
Phone: (615) 758-5858
Fax: (615) 758-5859

F226

Acctnum: COVASSOC (lab use only)
Template/Prelogin: P653887 P653874
Quote #:
Shipped Via: FedEx Priority

Covington & Associates

14257-B Dedeaux Road
Gulfport,MS 39503

Billing Information:

Mr. Lars Larson
14257-B Dedeaux Road
Gulfport,MS 39503

Report to: Mr. Lars Larson
Email: lars@covingtonassociates.net
Project Description: Gulfport Fertilizer
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Phone: (228) 396-0486
FAX:
Client Project #: 9397.00
Lab Project #: COVASSOC-GULFPORT
Collected by (print): L. Larson
Site/Facility ID#:
P.O.#:
Collected by (signature):
Immediately Packed on Ice N__ Y X

Rush? (Lab MUST Be Notified)
__ Same Day 200%
__ Next Day.....100%
__ Two Day.....50%
__ Three Day.....25%

Date Results Needed
Email? __No X Yes
FAX? __No __Yes

Analysis/Container/Preservative

Chain of Custody Page 2 of 2

ESC LABORATORIES
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone: (800) 767-5859
Phone: (615) 758-5858
Fax: (615) 758-5859

Account: COVASSOC (lab use only)
Template/Prelogin: T65380 P923574
Quote #:
Date Results Needed: 6-11-10 NC
Shipped Via: FedEx Priority

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDICP / PBDICP 500mlHDPE-NoPres	ASICP / PBICP 500mlHDPE-HNO3 <2	Remarks/Contaminant	Sample # (lab only)
MW-1	GRAB	GW	—	6/14/10	1305	2	X	X	STAT	L465824-09
MW-5		GW			1359	2	X	X		-10
MW-7		GW			1438	2	X	X		-11
MW-6		GW			1525	2	X	X		-12
MW-3		GW			1610	2	X	X		-13
DUP-1		GW				2	X	X		-14
		GW				2	X	X		
MW-2		GW	—	6/15/10	0657	2	X	X	L465837-03	45
MW-4			—	6/15/10	7140	2				-16

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

Remarks:

pH _____ Temp _____

Flow _____ Other _____

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
	6/15/10	1700	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)

Samples returned via: ☐ UPS ☑ FedEx ☐ Courier ☐

Tracking # 2 Bottles Received: 3

Date: 6/16/10 Time: 0905

Condition: OK (lab use only)

COC Seal Intact: Y N NA

pH Checked: NCF:

COVINGTON CIVIL & ENVIRONMENTAL, LLC

14257 DEDEAUX ROAD
SUITE B
GULFPORT, MS 39503

PHONE (228) 396-0486
FAX (228) 396-0487
E-MAIL LARSLARSON@BELLSOUTH.NET

February 23, 2010

Ms. Kayra Johnson, Project Engineer
Office of Pollution Control
Mississippi Department of Environmental Quality
Groundwater Assessment & Remediation Division
Jackson, Mississippi 39289-0385

Re: Comprehensive Groundwater Monitoring Report – December 2009
Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi
CCE Project No. 9397

Dear Ms. Johnson:

On December 2 and 3, 2008, Covington Civil & Environmental, LLC (CCE) conducted another comprehensive groundwater sampling event of all 14 monitoring wells that have been installed at this site. These on-going activities were conducted pursuant to the "Final Corrective Action Plan" (FCAP) that was submitted to the Mississippi Department of Environmental Quality (MDEQ) in October 2007, and revised in January 2008. Additionally, based on the fact that the construction of the clay cap had recently been completed as part of the Final Corrective Action Plan for this site and that it had been one-year since the previous groundwater sampling event was carried out, the December 2009 sampling event was performed to assess whether any changes in the groundwater quality had taken place since the previous sampling event. A USGS Topographic Quadrangle Map illustrating the location of the former Gulfport Fertilizer site is included as Figure 1.

BACKGROUND

In 2001, CCE initiated groundwater assessment activities that included the installation of the first seven monitoring wells (MW-1 through MW-7) within the original 33-acre Gulfport Fertilizer site. A subsequent groundwater monitoring program was initiated shortly thereafter that included the groundwater sampling of MW-1 through MS-7 on a quarterly basis. This initial program was concluded in 2004. A Comprehensive Report of the findings was presented to the MDEQ following this monitoring period. Subsequent sampling events have included a supplementary assessment that took place after Hurricane Katrina in 2005, followed by "Comprehensive Groundwater Assessments" in November 2007 and December 2008; after the seven new monitoring wells (MW-8 through MW-14) had been installed. The findings of those assessments were submitted to the MDEQ in January 2008 and February 2009. Pursuant to the "Interim Corrective Action Plan" (ICAP) for this site, the November 2007 groundwater assessment was conducted principally to delineate the extent of lead and arsenic groundwater contamination to the north and west of the original (33-acre) fertilizer site and to establish the

basis with which a future groundwater monitoring program would be initiated. The December 2009 sampling event marks the 12th round of groundwater sample collection and the third time that a comprehensive sampling event of all 14 monitoring wells has been conducted. A monitoring well location map is included as Figure 2.

MONITORING WELL SAMPLING

Before groundwater sample collection occurred, CCE measured groundwater levels in each of the 14 monitoring wells. This was conducted to calculate the elevation of the potentiometric surface and to determine the well volume of each well so that an appropriate amount of groundwater would be purged prior to sampling. These groundwater elevations are listed in Table 1.

After recording the groundwater level, dedicated sample tubing was lowered into the well and positioned at approximately the middle of the water column. The sampling pump was then activated and field parameters (temperature, conductivity, pH and field turbidity) were monitored during purging. Purging continued until three (3) consecutive readings did not vary more than 0.5^0 C (field temperature), 3% (conductivity) and 0.1 standard units (pH). Field water quality measurements and parameters were recorded on a "Well Sampling Field Data Sheet" for each monitoring well. Copies of the "Well Sampling Field Data Sheet" for each monitoring well are included in Appendix A.

Once well purging was completed, groundwater samples were collected from each monitoring well. As part of the quality control program for this site, duplicate samples were also collected. One duplicate sample was collected from the set of seven newly installed wells and one from the original set of seven wells. Each sample was labeled and placed in a cooler with ice to maintain 4^0 C. Required information was recorded on the Sample Chain-of-Custody forms, included in Appendix B. The cooler was shipped to Environmental Science Corporation, Mt. Juliet, TN for analysis. Each sample was analyzed for total and dissolved arsenic and lead. The analytical results and field groundwater pH measurements are summarized in Table 2 (arsenic analyses), Table 3 (lead analyses), and Table 4 (pH measurements). The Laboratory Analytical Report Sheets and Chain-of-Custody forms are included in Appendix B.

POTENTIOMETRIC SURFACE

Historical Groundwater Trends

Historical groundwater elevations recorded at this site are included in Table 1. Table 1 also lists the maximum and minimum groundwater elevations and potentiometric changes ("Head

Fluctuation"), as well as the average groundwater elevations for all of the wells. The most notable observation regarding the groundwater elevations during the most recent sampling event is the two-foot to four-foot increase in water levels across the entire site. This was due primarily to the abnormally high amounts of precipitation that the Gulf Coast received in the fall of 2009. Even with these potentiometric surface increases, the highest groundwater elevations within the overall property continue to be recorded at MW-6 and MW-7, while MW-8, MW-9 and MW-11 consistently report the lowest groundwater elevations. As previously reported, the historical groundwater elevations are controlled primarily by the changes in the topographic surface between the southern portions of the site (MW-6, MW-7 and MW-13 – *higher areas*) and the northern portions of the site (MW-8, MW-9 and MW-11 – *lower areas*). These potentiometric surface data continue to document that the historical groundwater flow regime is principally from the southeast to the northwest.

December 2009 Potentiometric Surface

Figure 3 illustrates the potentiometric surface of the surficial aquifer at the Gulfport Fertilizer site during the December 2009 sampling event. Figure 3-A illustrates the potentiometric surface of the surficial aquifer recorded during the 2007 and 2008 sampling events. Each of these maps reflects, generally, the same gradual decline in groundwater elevations from the southeast to the northwest. As in the previous sampling events, the potentiometric gradient of the December 2009 sampling event is also consistent with the gradient which was documented in 2007 and 2008. The groundwater flow gradients established in 2007, 2008 and 2009 has been 0.0051feet/foot (< 1%). This gradient is consistent with the 0.0050 feet/foot historical "average" gradient established for the original 33-acre site.

LABORATORY ANALYTICAL RESULTS

Arsenic Concentrations

Table 2 presents the historical arsenic concentrations for groundwater samples collected from all of the wells at the site. Arsenic concentrations have been compared to the MDEQ's Tier 1 Groundwater MCL of 0.010 mg/L.

In comparing the analytical results reported for the seven newest wells (MW-8 through MW-14) from 2007 and 2008 with the most recent 2009 data, arsenic was again reported at concentrations "below" the Tier 1 MCL of 0.010 mg/L at all new well locations with the exception of MW-8. Some of these 2009 arsenic concentrations were reported at levels just above the laboratory method detection limit of 0.0010 mg/L. In contrast to these consistently low arsenic levels, MW-8 recently reported a concentration of **0.029 mg/L**. Given some of the well

installation problems that took place during the completion of MW-8 in 2007 (i.e. *difficulties encountered in auger retrieval and sand filter pack placement*), significantly higher precipitation rates experienced in the late fall of 2009, as well as the excessive turbidity levels that some of the wells produced (especially MW-8) during the recent sampling event, CCE believes that the arsenic level of 0.029 mg/L reported at MW-8 is a direct result of these factors. Accordingly, and in light of the previously non-detectable arsenic concentrations reported for MW-8, CCE believes that the most effective mechanism to confirm that no arsenic impacts occur in this portion of the site, is to simply plug and abandon this well and install a new monitoring well directly adjacent to it. This new well (MW-8A) would be installed with even larger hollow-stem augers (10 to 12-inch inside diameter augers) and a larger sand filter pack to ensure that groundwater turbidity levels are significantly reduced for more consistent groundwater quality monitoring. CCE proposes to install proposed MW-8A in April to June 2010, once the site has adequately dried.

Assuming that the total arsenic concentration recently reported at MW-8 is, as CCE believes, an anomaly, the last three sampling events clearly confirm that groundwater further to the north and west of the original 33-acre site has been minimally impacted by the historical operations at the Gulfport Fertilizer plant. The arsenic iso-Concentration Maps included as Figures 4 and 4-A more effectively illustrate this. Figure 4 represents the arsenic iso-Concentrations derived from the December 2009 sampling event, whereas Figure 4-A represents a composite map of the arsenic concentrations reported during the 2007 and 2008 sampling events.

As these figures show, the configuration of the arsenic contours remains fairly consistent during the past three sampling events. Minor fluctuations in total arsenic concentrations are continually noted in the seven original monitoring wells, but, as Figure 4 shows, the most recent sampling event reflects a slight decrease in arsenic at four wells (MW-2, MW-4, MW-6 and MW-7) relative to the historical "average" arsenic concentrations. The most notable observation regarding these data is, with the exception of the anomaly reported at MW-8, that arsenic levels continue to be reported at concentrations much lower than the Tier 1 MCL of 0.010 mg/L in the 7 new monitoring wells (MW-8 through MW-14). Accordingly, the absence of detectable arsenic concentrations and/or reported levels below the Tier 1 MCL continue to support the fact that the identified arsenic groundwater plume does not constitute a "mobile mass", but rather the result of slightly elevated arsenic levels "in the soils" in various source areas on and very close to the original 33-acre site.

Lead Concentrations

Table 3 presents the historical lead concentrations for groundwater samples collected from all fourteen site monitoring wells. Lead concentrations have been compared to the MDEQ's Tier 1 TRG for lead in groundwater of 0.015 mg/L. As Table 3 reflects, the only well location that continues to consistently report an exceedance of the Tier 1 TRG for lead is MW-1. A lead excursion above the Tier 1 TRG was also reported at MW-8 at 0.12 mg/L; however, as previously explained, this concentration is most likely an anomaly and will be rectified by the abandonment of this well and the installation of a new well as this location. The December 2009 sampling event reported a total lead concentration at MW-1 of 0.048 mg/L and a dissolved lead concentration of 0.043 mg/L. All other monitoring wells (except MW-8) reported total and dissolved lead concentrations that were either less than the Tier 1 TRG or just slightly above the laboratory detection limit of 0.0010 mg/L.

Historical groundwater data does reflect occasional Tier 1 TRG exceedances for lead at MW-4 and MW-6; but as previously documented, the general trend for these two wells has been a gradual decrease and normalization in total lead concentrations. MW-10 reported a lead exceedance during the November 2007 sampling event of 0.020 mg/L; however, the December 2008 and 2009 analytical results reported non-detectable lead concentrations of (<0.0050 mg/L). Given the relatively recent installation of MW-10 (2007) and the subsequent non-detectable lead levels that were reported following the initial excursion, it seems clear that this initial lead exceedance reported at MW-10 is truly an anomaly caused by entrained sediments captured following in-complete well development. This same conclusion can also be applied to the total lead exceedance reported at MW-8. Figure 5 illustrates the lead iso-concentration lines in the groundwater during the December 2009 sampling event. Figure 5-A illustrates a composite map of the total lead iso-concentrations for the 2007 and 2008 sampling events. As these figures depict, elevated lead concentrations above the 0.015 mg/L Tier 1 TRG remain within the area of the original fertilizer site; specifically in the area closest to MW-1.

pH Levels

Table 4 records the historical pH levels that have been measured at each of the site monitoring wells. Figure 6 illustrates the pH contours for data collected during the December 2009 sampling event. Figure 6-A is a composite map illustrating the pH levels recorded during the 2007 and 2008 sampling events.

Figures 6 and 6-A illustrate that the primary zone of depressed pH (pH < 4.0) remains generally in the area around MW-1, MW-2 and MW-3. The pH levels recorded during the most recent sampling event did, however, report an overall downward trend across the entire site. Most of

these pH declines are small; less than one-half to one-quarter of a Standard Unit. However, MW-12 reported a decrease in pH from 6.01 to 5.97 (between 2007 and 2008), and then declining to 3.97 between 2008 and 2009; a difference of two whole Standard Units. Other wells that reported declines in pH were MW-10 with a drop in pH between 2008 and 2009 of 4.24 to 3.18; and MW-11 with a pH decline of 4.41 to 3.72. CCE believes that these pH declines could possibly be the result of a difference in field instrumentation recently utilized to record water quality parameters. These declines could, however, also be the result of changes in the surface dynamics of this site (i.e. construction of the clay CAP and the potential geochemical changes that it has invoked), and/or the significant increase in measurable precipitation experienced all along the Gulf Coast in the fall of 2009. Whatever the explanation may ultimately be, it is clear from the recent groundwater data that the decrease in pH has not created any notable difference in the concentrations of total lead and total arsenic that have historically been reported across this site.

CONCLUSIONS AND RECOMMENDATIONS

Three comprehensive sampling events of all 14 site monitoring wells have now been completed. Given the analytical results of these three consecutive events, CCE believes that there is now more compelling evidence to establish that elevated lead and arsenic concentrations (levels in excess of the MDEQ's Tier 1 TRG standards) are delineated. In fact, these data demonstrate that groundwater impacts on the former Gulfport Fertilizer site are confined mostly to the original 33-acre portion of the property.

In the Laboratory Analytical Results section of this report, CCE provided an explanation of why it believes that exceedances of the Tier 1 TRG for lead and arsenic occurred at MW-8. As discussed, problems encountered during the initial well installation activities (i.e. the possibility of clay bridges formed within the sand filter pack during well completion) is the most likely reason for the recent analytical results. Record high precipitation rates this fall could also have caused the increased turbidity levels. Since turbidity at this well has consistently been high, even after repeated attempts to re-develop the well, CCE believes that the most prudent measure would be to plug and abandon this well, and install a new well adjacent to it using even larger diameter hollow stem augers. This will help ensure that more consistent groundwater quality information is recorded at this location, and provide more reliable data regarding the areas of the original 33-acre site where lead and arsenic exceed their respective Tier 1 TRG's.

As always, we look forward to reviewing your comments. Please contact us with any questions.

Very truly yours,
Covington Civil & Environmental, LLC

Lars Larson, P.G.
Senior Geologist

John F. Szabo, P.E.
Principal

JOHN F. SZABO
REGISTERED PROFESSIONAL
ENGINEER
14192
STATE OF MISSISSIPPI

ENCLOSURES

cc: Mr. Tony Russell, OPC - MDEQ
Mr. Delma Powell, Hancock Bank

LIST OF TABLES

Table 1
Groundwater Elevations

Historical Groundwater Sampling Events
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Round	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
1	23.61	20.99	21.84	23.35	23.89	25.09	25.51
2	26.01	23.11	24.14	25.66	26.26	27.32	27.65
3	26.37	23.55	24.82	26.06	26.58	27.77	28.26
4	25.95	23.39	24.64	25.78	26.20	27.45	27.76
5	27.15	25.58	27.00	26.16	27.48	28.35	29.12
6	27.03	23.83	25.26	26.20	27.21	28.17	28.82
7	25.47	22.92	23.63	25.52	25.72	26.79	26.78
8	27.53	24.23	26.02	26.3	27.9	28.37	29.46
9	25.86	23.65	24.68	25.78	26.03	27.28	27.19
10	26.23	23.65	25.17	26.13	27.00	28.34	28.83
11	24.37	21.52	22.41	24.37	24.41	25.79	25.6
12	26.07	25.1	25.95	26.22	27.00	28.39	28.27
Max. Elevation	27.53	25.58	27	26.3	27.9	28.37	29.46
Min. Elevation	23.61	20.99	21.84	23.35	23.89	25.09	25.51
Head Fluctuation	3.92	4.59	5.16	2.95	4.01	3.28	3.95
POT Average	26.12	23.49	24.72	25.69	26.43	27.49	27.94

Sampling Round	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
10	19.21	18.45	22.39	19.25	24.22	26.56	28.88
11	18.47	15.11	20.39	17.42	21.02	24.66	25.89
12	19.89	19.31	22.49	19.96	24.61	27.85	29.01
Max. Elevation	19.21	18.45	22.39	19.25	24.22	26.56	28.88
Min. Elevation	18.47	15.11	20.39	17.42	21.02	24.66	25.89
Head Fluctuation	0.74	3.34	2.0	1.83	3.2	1.9	2.99
POT Average	19.19	17.62	21.76	18.88	23.28	26.36	27.93

Note: All groundwater elevations in feet, mean sea level (ft., msl).
Monitoring Wells 8 through 14 were installed in October 2007, consequently, the first sampling round for these well corresponds to the 10th sampling event for the original 7 wells.

Table 2
Arsenic Concentrations

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Round	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
1	<0.010	**0.054**	**0.011**	**0.035**	<0.010	**0.016**	<0.010
1-Duplicate	**0.018**			<0.010	<0.010		
2	<0.010	**0.073**	<0.010	<0.010	<0.010	**0.061**	<0.010
2-Duplicate		**0.095**	<0.010	**0.039**	<0.010	**0.041**	
3	**0.018**	**0.052**	<0.010	**0.048**	<0.010	**0.030**	**0.017**
3-Duplicate				**0.050**		**0.034**	
4	<0.010	**0.031**	<0.010	**0.019**	<0.010	<0.010	<0.010
4-Duplicate	<0.010	**0.051**	<0.010	**0.016**	<0.010	<0.010	**0.014**
5	**0.021**	**0.019**	<0.010	**0.057**	<0.010	**0.032**	**0.011**
5-Duplicate	**0.018**	**0.016**	NS	**0.050**	<0.010	**0.031**	**0.011**
6	**0.012**	**0.029**	<0.010	**0.055**	<0.010	**0.028**	<0.010
6-Duplicate	**0.022**	**0.026**	**0.011**	**0.053**	<0.010	**0.032**	**0.012**
7	**0.030**	**0.090**	**0.014**	**0.050**	<0.010	**0.028**	**0.014**
7-Duplicate	**0.022**	**0.089**	<0.010	**0.047**	<0.010	**0.024**	**0.012**
8	<0.010	**0.100**	<0.010	**0.053**	<0.010	**0.025**	<0.010
8-Duplicate	**0.012**	**0.082**	<0.010	**0.042**	<0.010	**0.018**	<0.010
9	**0.017**	**0.100**	**0.012**	**0.049**	<0.010	**0.028**	**0.010**
9-Duplicate						**0.027**	
10	**0.052**	**0.064**	**0.015**	**0.035**	**0.011**	**0.024**	**0.018**
10-Duplicate		**0.063**					**0.019**
11	**0.044**	**0.079**	**0.022**	**0.012**	<0.010	**0.024**	**0.017**
11-Duplicate							**0.017**
12	**0.038**	**0.024**	**0.014**	**0.013**	<0.0010	**0.026**	**0.013**
12-Duplicate		**0.025**					
Average	**0.024**	**0.060**	**0.014**	**0.042**	**0.011**	**0.030**	**0.014**

Sampling Round	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
10	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
10-Duplicate	<0.010					<0.010	
11	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
11-Duplicate						<0.010	
12	**0.029**	**0.0014**	**0.0012**	**0.0018**	**0.0026**	<0.0010	<0.0010
12-Duplicate						<0.0010	
Average							

Notes:

1. All arsenic concentrations in mg/l.
2. Arsenic concentrations in bold represent positive detections above the laboratory detection limit.
3. Arsenic concentrations exceeding MDEQ Tier 1 Groundwater MCL for arsenic (0.010 mg/l) are shaded.

Table 3
Lead Concentrations

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Round	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
1	**0.020**	**0.0074**	**0.0087**	**0.016**	<0.0050	<0.0050	<0.0050
1-Duplicate	**0.015**			0.014	<0.0050		
2	**0.014**	<0.0050	<0.0050	0.0053	**0.012**	**0.017**	**0.0062**
2-Duplicate		**0.011**	**0.011**	**0.016**	**0.011**	**0.014**	
3	**0.023**	**0.0095**	**0.0076**	0.0066	<0.0050	<0.0050	<0.0050
3-Duplicate				0.0056		<0.0050	
4	**0.023**	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
4-Duplicate	**0.022**	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
5	**0.027**	**0.0094**	**0.011**	**0.014**	**0.0063**	**0.0071**	<0.0050
5-Duplicate	**0.019**	**0.0083**	NS	**0.013**	**0.0069**	**0.0074**	**0.0051**
6	**0.029**	**0.011**	**0.010**	**0.014**	<0.0050	**0.0087**	**0.0068**
6-Duplicate	**0.028**	**0.013**	**0.0092**	**0.015**	**0.0086**	**0.0098**	**0.0062**
7	**0.0072**	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
7-Duplicate	**0.0068**	<0.0050	<0.0050	<0.0050	**0.0058**	<0.0050	<0.0050
8	**0.042**	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
8-Duplicate	**0.042**	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
9	**0.009**	**0.0057**	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
9-Duplicate						<0.0050	
10	**0.066**	<0.0050	<0.0050	**0.014**	<0.0050	<0.0050	<0.0050
10-Duplicate		**0.0051**					<0.0050
11	**0.071**	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate							<0.0050
12	**0.048**	**0.0040**	**0.0012**	**0.0028**	**0.0017**	**0.0055**	<0.0010
12-Duplicate		**0.0039**					
Average	**0.025**	**0.009**	**0.010**	**0.012**	**0.008**	**0.011**	**0.006**

Sampling Round	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
10	<0.0050	<0.0050	**0.02**	<0.0050	<0.0050	<0.0050	<0.0050
10-Duplicate	<0.0050					<0.0050	
11	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate						<0.0050	
12	**0.12**	<0.0010	<0.0010	<0.0010	**0.0069**	<0.0010	<0.0010
12-Duplicate						<0.0010	

Notes:

1. All lead concentrations in mg/l.
2. Lead concentrations in bold represent positive detections above the laboratory detection limit.
3. Lead concentrations exceeding MDEQ Tier 1 Groundwater MCL for lead (0.015 mg/l) are shaded.

Table 4
pH Readings

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Round	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
1	3.22	3.95	3.96	4.41	5.06	5.41	6.23
2	3.24	3.94	4.04	4.46	4.93	5.86	6.33
3	3.26	3.91	3.98	4.43	5.06	5.70	6.40
4	3.25	4.15	4.02	4.32	4.98	5.88	6.39
5	3.10	3.75	3.83	4.08	4.70	5.90	6.09
6	3.16	3.99	3.88	4.18	4.45	5.83	6.24
7	3.34	3.96	4.08	4.45	4.77	5.62	6.47
8	3.24	3.85	3.92	4.27	4.46	5.90	6.35
9	3.27	3.86	3.75	4.74	4.63	6.21	6.20
10	3.23	3.64	3.6	4.35	4.77	5.84	6.23
11	3.20	3.56	3.71	4.44	4.95	5.76	6.21
12	2.96	3.06	3.16	4.08	4.86	5.61	5.75
pH Average	**3.21**	**3.80**	**3.83**	**4.35**	**4.80**	**5.79**	**6.24**

Sampling Round	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
10	5.11	4.5	4.21	4.09	6.01	4.1	4.36
11	5.04	5.01	4.24	4.41	5.97	4.04	4.10
12	4.85	4.42	3.18	3.72	3.97	3.72	3.79
pH Average	**5.08**	**4.76**	**4.23**	**4.25**	**5.99**	**4.07**	**4.23**

Notes:

1. All pH readings are expressed in standard units.

LIST OF FIGURES

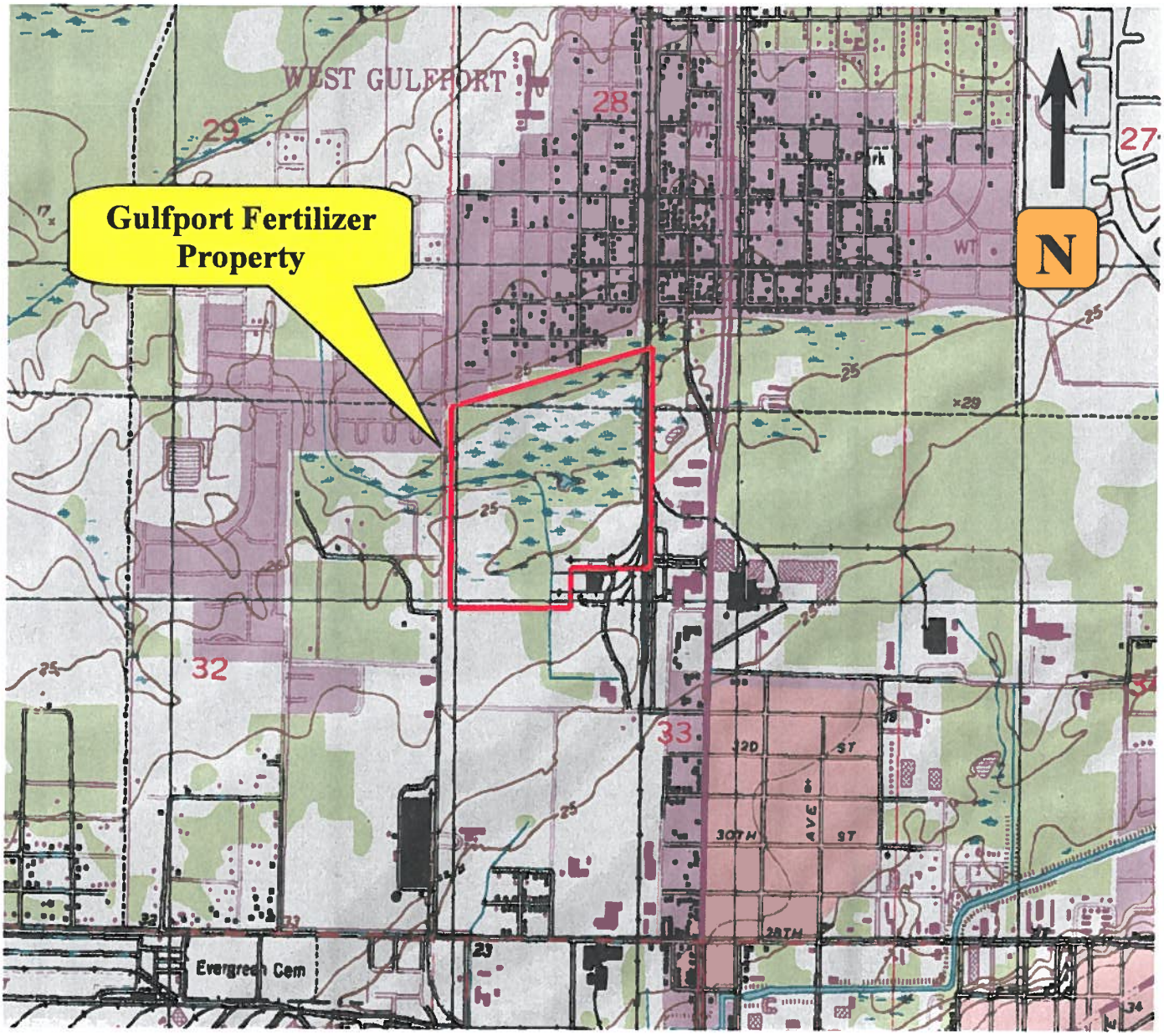
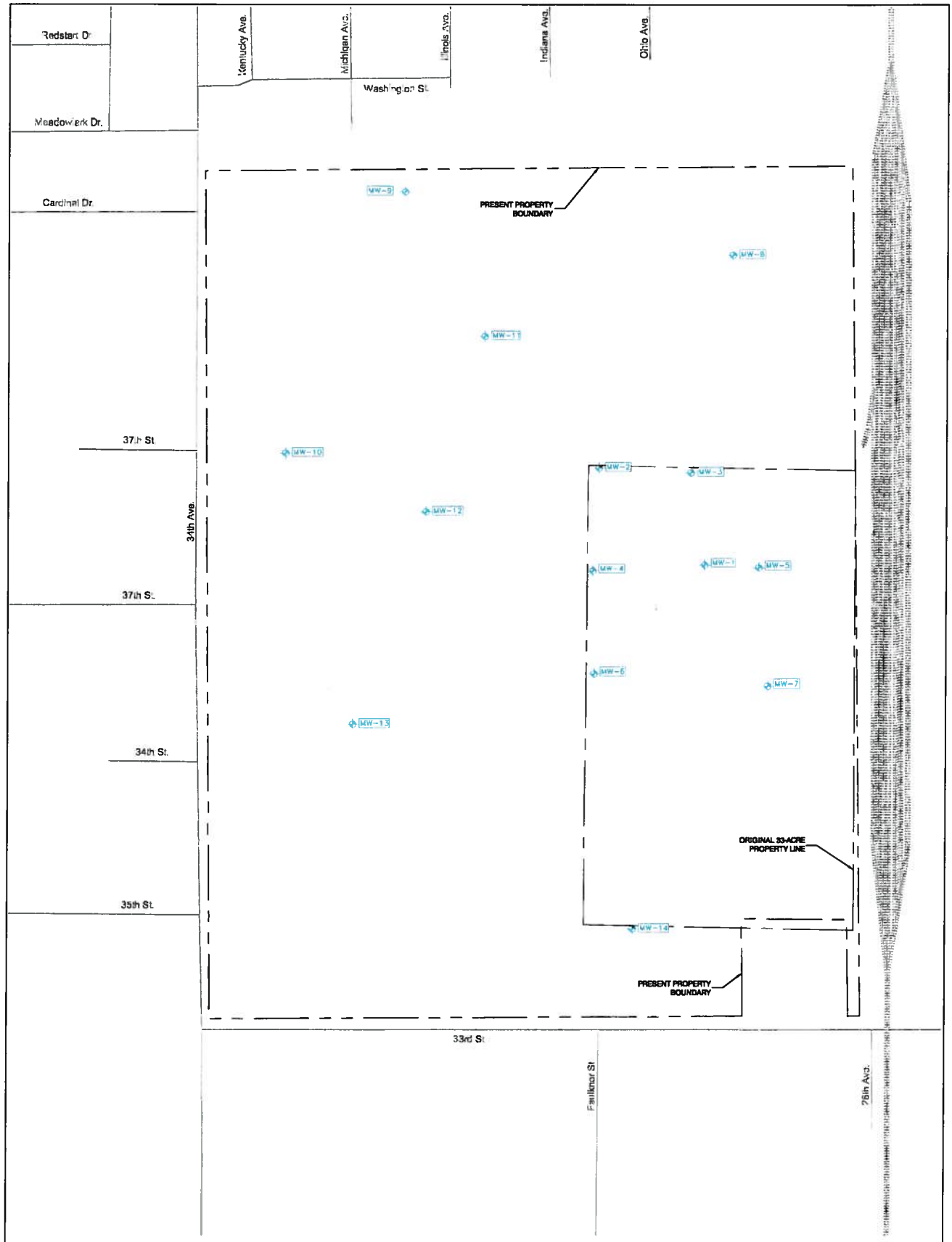


Figure 1 - Site Location Map
Gulfport Fertilizer Site
U.S.G.S. 7.5-Minute Quadrangle Map
Gulfport North, Mississippi
1994
CAC Project # 9397



LEGEND

MW-14 GROUNDWATER MONITORING WELL LOCATION

300 0 300 600 900

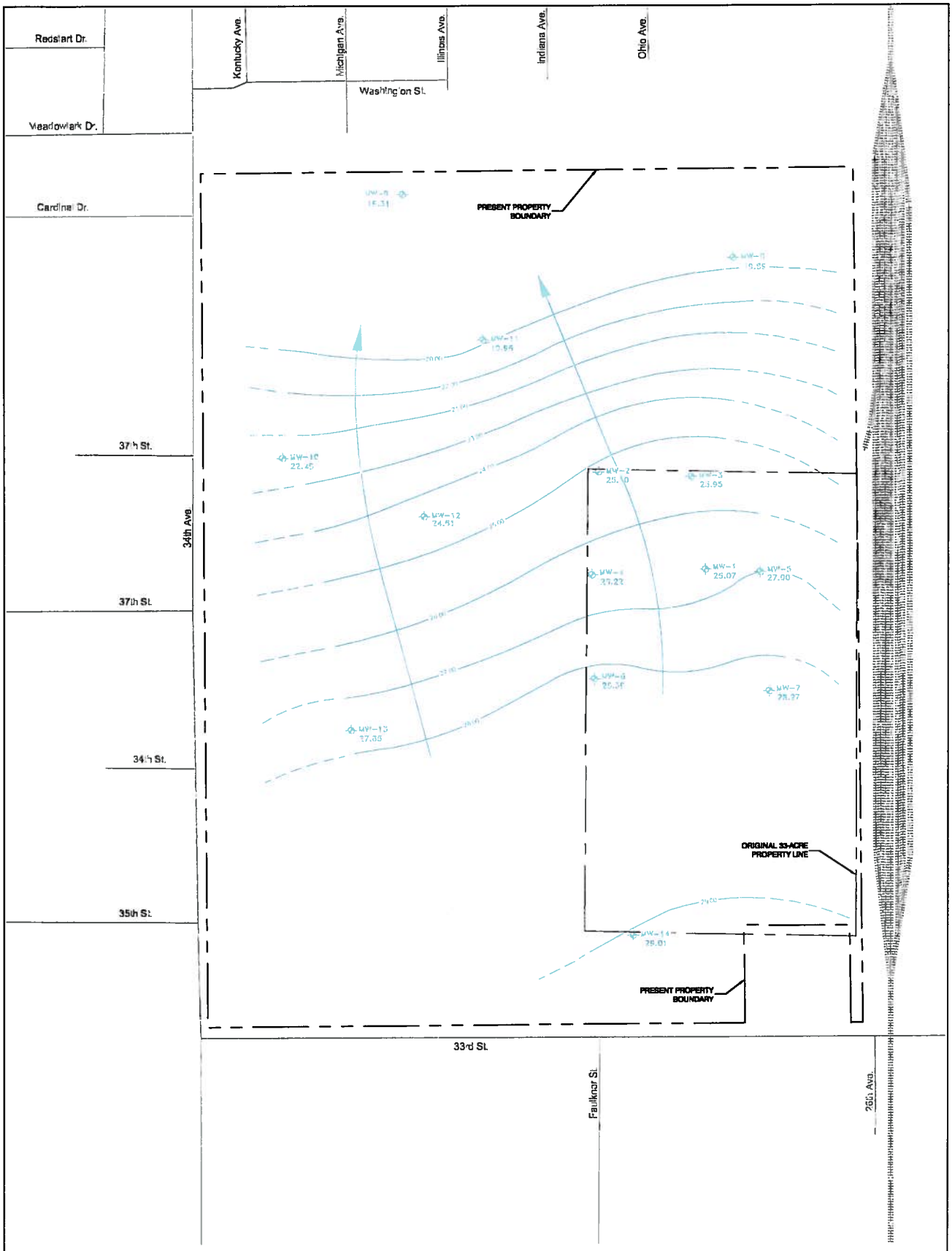
GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC

Former Gulfport Fertilizer Site
Gulfport, MS

Monitoring Well Location Map

DATE: 02/18/10
SCALE: 1" = 300'
PROJECT NO. 0307
FILE:
FIGURE: 2



LEGEND

MW-14 GROUNDWATER MONITORING WELL LOCATION

28.00 GROUNDWATER ELEVATION IN FEET (REFERENCED TO MEAN SEA-LEVEL)

27.00 GROUNDWATER POTENTIOMETRIC CONTOUR

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON CIVIL & ENVIRONMENTAL, LLC

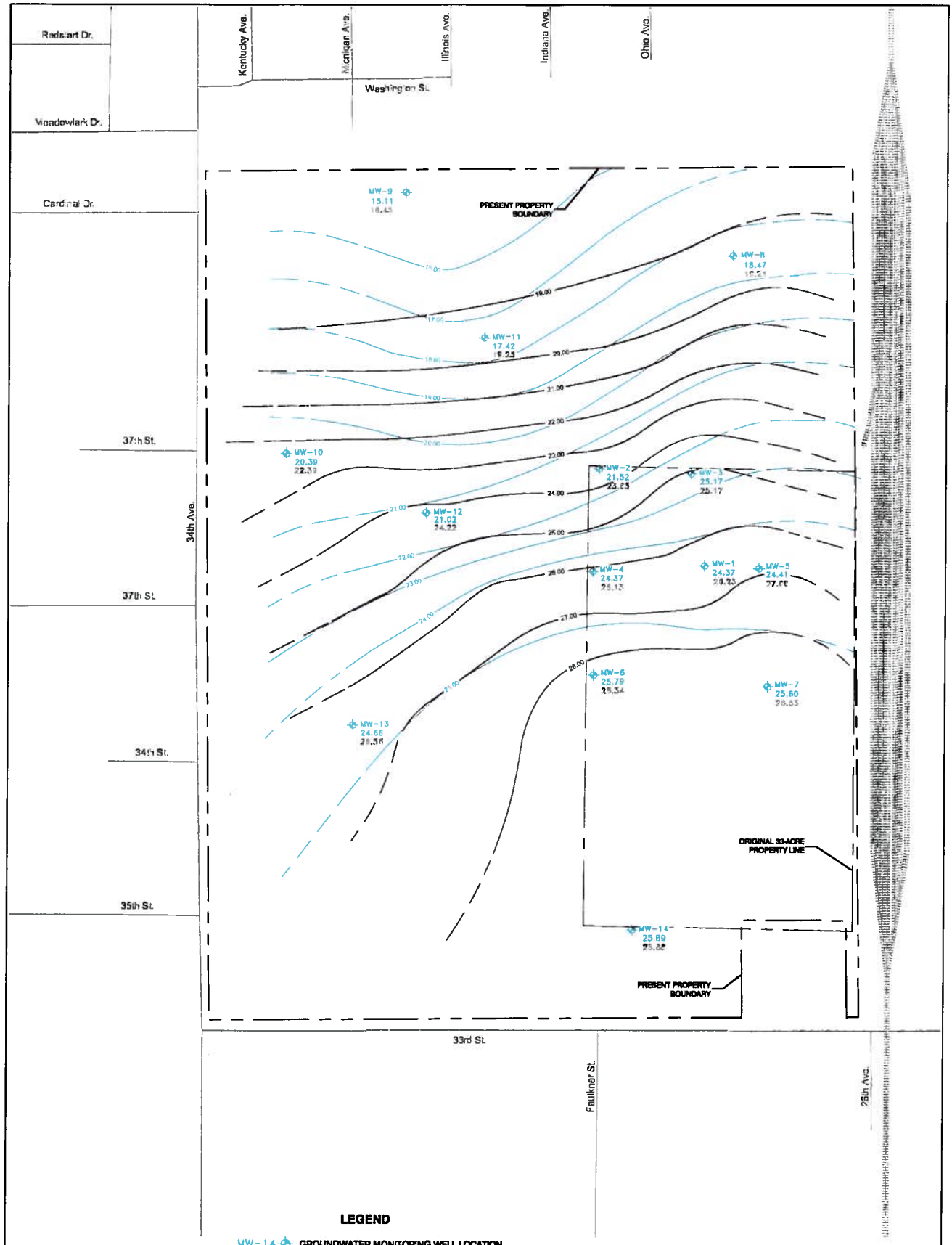
14357 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

Potentiometric Surface Map
December 2 and 3, 2009

DATE: 02/10/10
SCALE: 1" = 300'
PROJECT NO. 9397
FILE: 9397A0_GULFPORT FERTILIZER\CUTTY_EATON\9397A0R04_04-09

FIGURE: 3



LEGEND

MW-14 — GROUNDWATER MONITORING WELL LOCATION

25.89 — 2008 GROUNDWATER ELEVATION IN FEET (REFERENCED TO MEAN SEA-LEVEL)

27.00 — 2008 GROUNDWATER POTENTIOMETRIC CONTOUR

28.85 — 2007 GROUNDWATER ELEVATION IN FEET (REFERENCED TO MEAN SEA-LEVEL)

27.00 — 2007 GROUNDWATER POTENTIOMETRIC CONTOUR

300 0 300 600 900

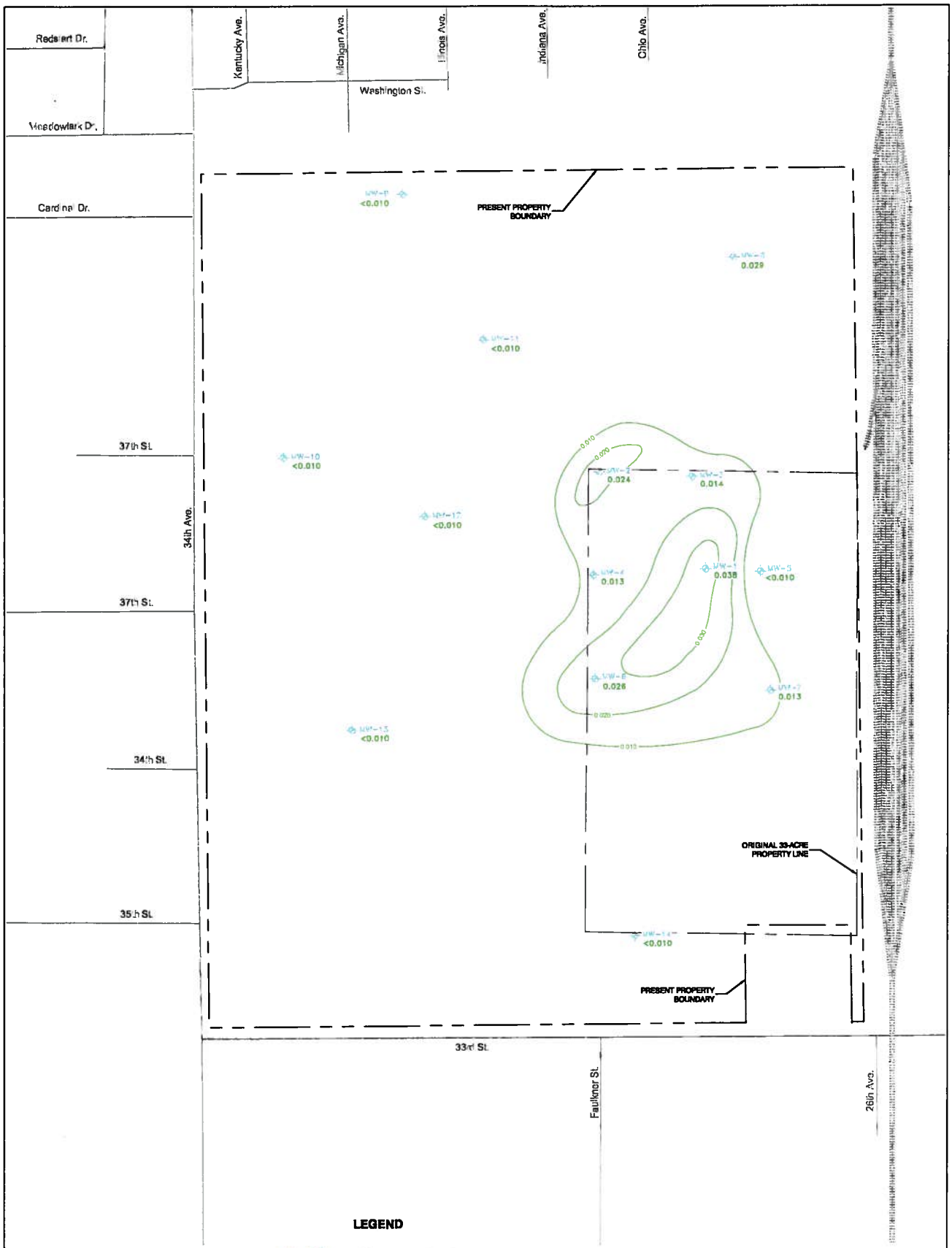
GRAPHIC SCALE – 1" = 300'

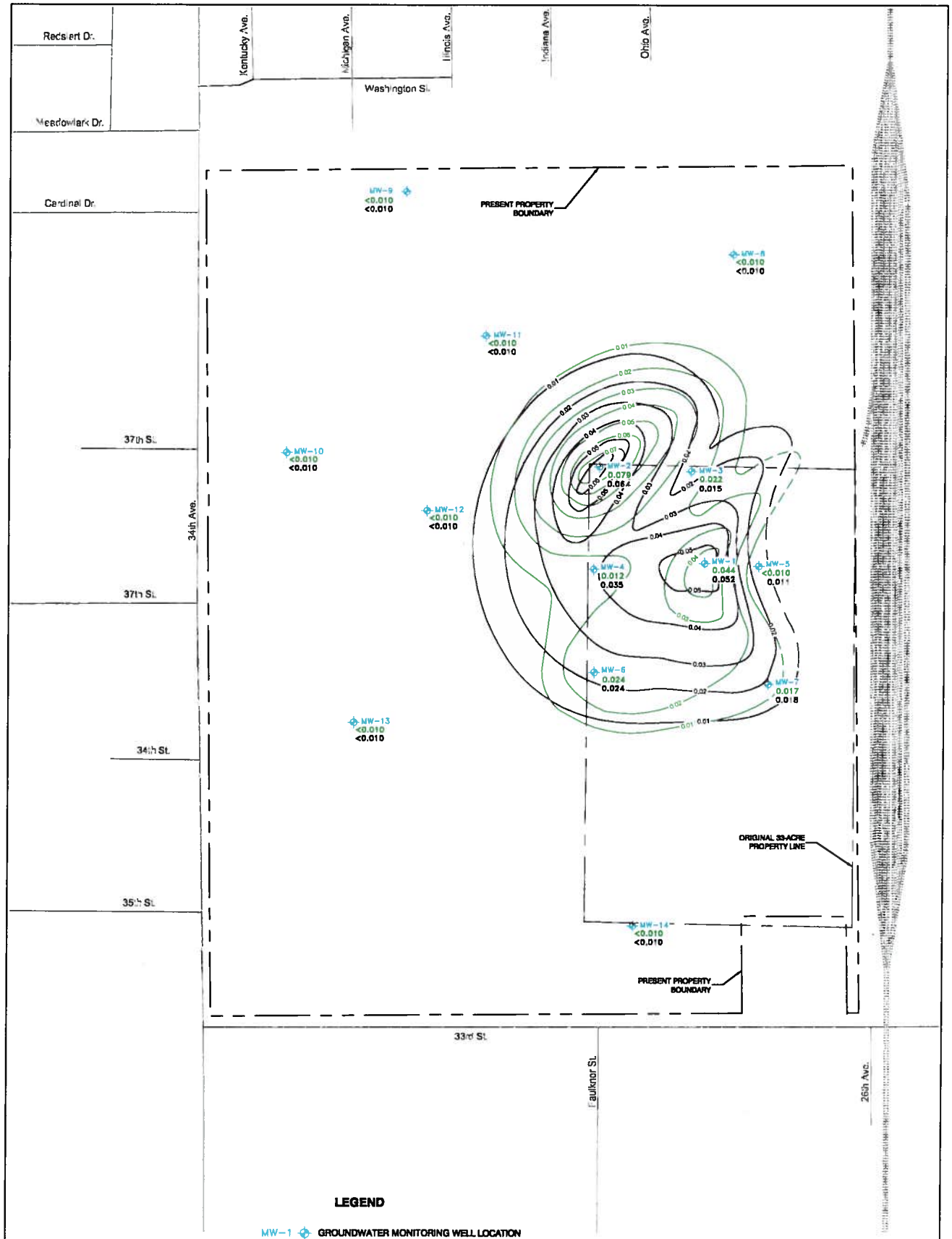
COVINGTON
CIVIL & ENVIRONMENTAL, LLC

Former Gulfport Fertilizer Site
Gulfport, MS

Potentiometric Surface Map
December 8-9, 2008 & November 1, 2007

DATE 02/19/10 | SCALE 1" = 300' | PROJECT NO. 0397 | FIGURE 3A


Redalert Dr.
Meadowlark Dr.
Cardinal Dr.
37th St.
34th Ave.
37th St.
34th St.
35th St.
Kentucky Ave.
Michigan Ave.
Illinois Ave.
Indiana Ave.
Ohio Ave.
Washington St.
PRESENT PROPERTY BOUNDARY
ORIGINAL 33-ACRE PROPERTY LINE
PRESENT PROPERTY BOUNDARY
33rd St.
Faulkner St.
26th Ave.
MW-1 0.038
MW-2 0.014
MW-3 0.024
MW-4 0.013
MW-5 <0.010
MW-6 0.026
MW-7 0.013
MW-8 <0.010
MW-9 0.029
MW-10 <0.010
MW-11 <0.010
MW-12 <0.010
MW-13 <0.010
MW-14 <0.010
0.010
0.020
0.030
0.038
LEGEND
GROUNDWATER MONITORING WELL LOCATION
0.0038 2009 ARSENIC CONCENTRATION IN PARTS PER MILLION (PPM)
0.030 2009 ARSENIC ISO-CONCENTRATION CONTOUR
300 0 300 600 900
GRAPHIC SCALE – 1" = 300'
COVINGTON
CIVIL & ENVIRONMENTAL, LLC
Former Gulfport Fertilizer Site
Gulfport, MS
Arsenic Iso-Concentration Map
December 2 and 3, 2009
DATE: 02/19/10
SCALE: 1" = 300'
FIGURE: 4



COVINGTON
CIVIL & ENVIRONMENTAL, LLC

Former Gulfport Fertilizer Site
Gulfport, MS
Arsenic Iso-Concentration Map
December 8-9, 2008 & November 1, 2007

DATE: 02/19/10
SCALE: 1" = 300'
PROJECT NO. 0307
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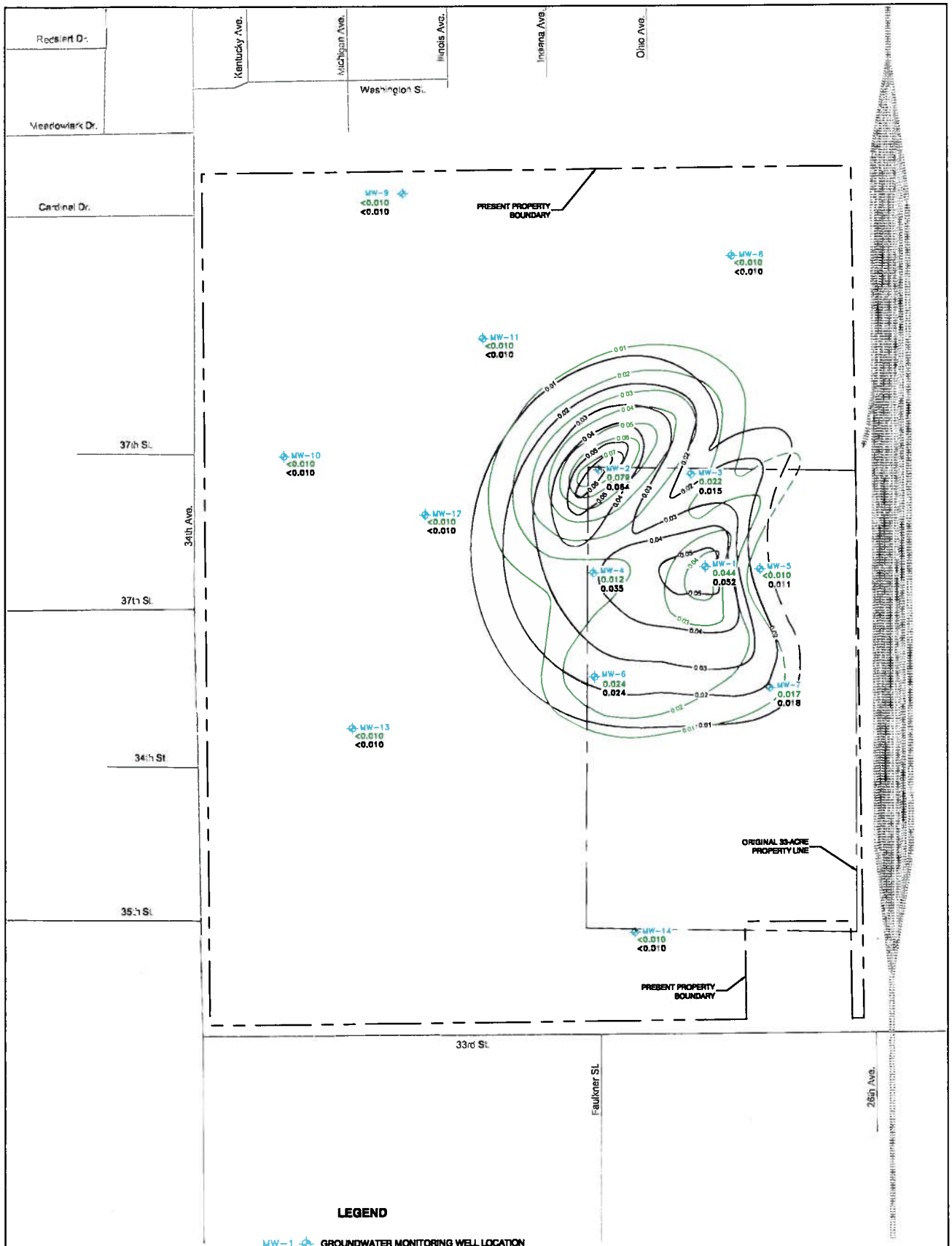
FIGURE: 4A



LEGEND

- MW-1 — GROUNDWATER MONITORING WELL LOCATION
- 0.044 — 2008 ARSENIC CONCENTRATION IN PARTS PER MILLION (PPM)
- 0.01 — 2008 ARSENIC ISO-CONCENTRATION CONTOUR
- 0.052 — 2007 ARSENIC CONCENTRATION IN PARTS PER MILLION (PPM)
- 0.01 — 2007 ARSENIC ISO-CONCENTRATION CONTOUR

300 0 300 600 900

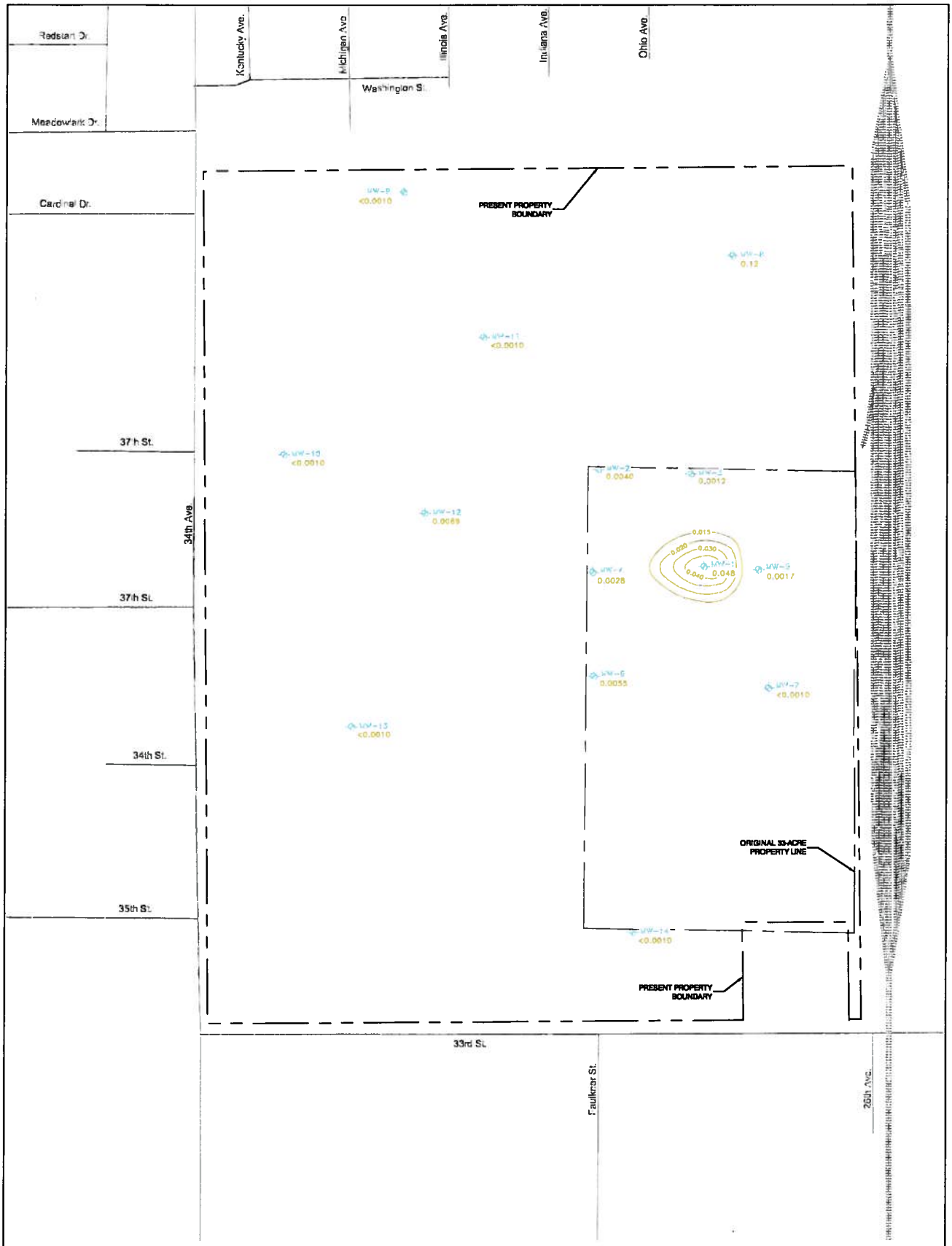
GRAPHIC SCALE – 1" = 300'

COVINGTON CIVIL & ENVIRONMENTAL, LLC

Former Gulfport Fertilizer Site
Gulfport, MS

Arsenic Iso-Concentration Map
December 8-9, 2008 & November 1, 2007

DATE: 03/10/10 | PROJECT NO. 0397 | FIGURE: 4A
SCALE: 1" = 300' | FILE: CSOAD_...GULFPORT FERTILIZER\DRAWING\...



LEGEND

MW-1 GROUNDWATER MONITORING WELL LOCATION

0.048 LEAD CONCENTRATION IN PARTS PER MILLION (PPM)

0.015 LEAD ISO-CONCENTRATION CONTOUR

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

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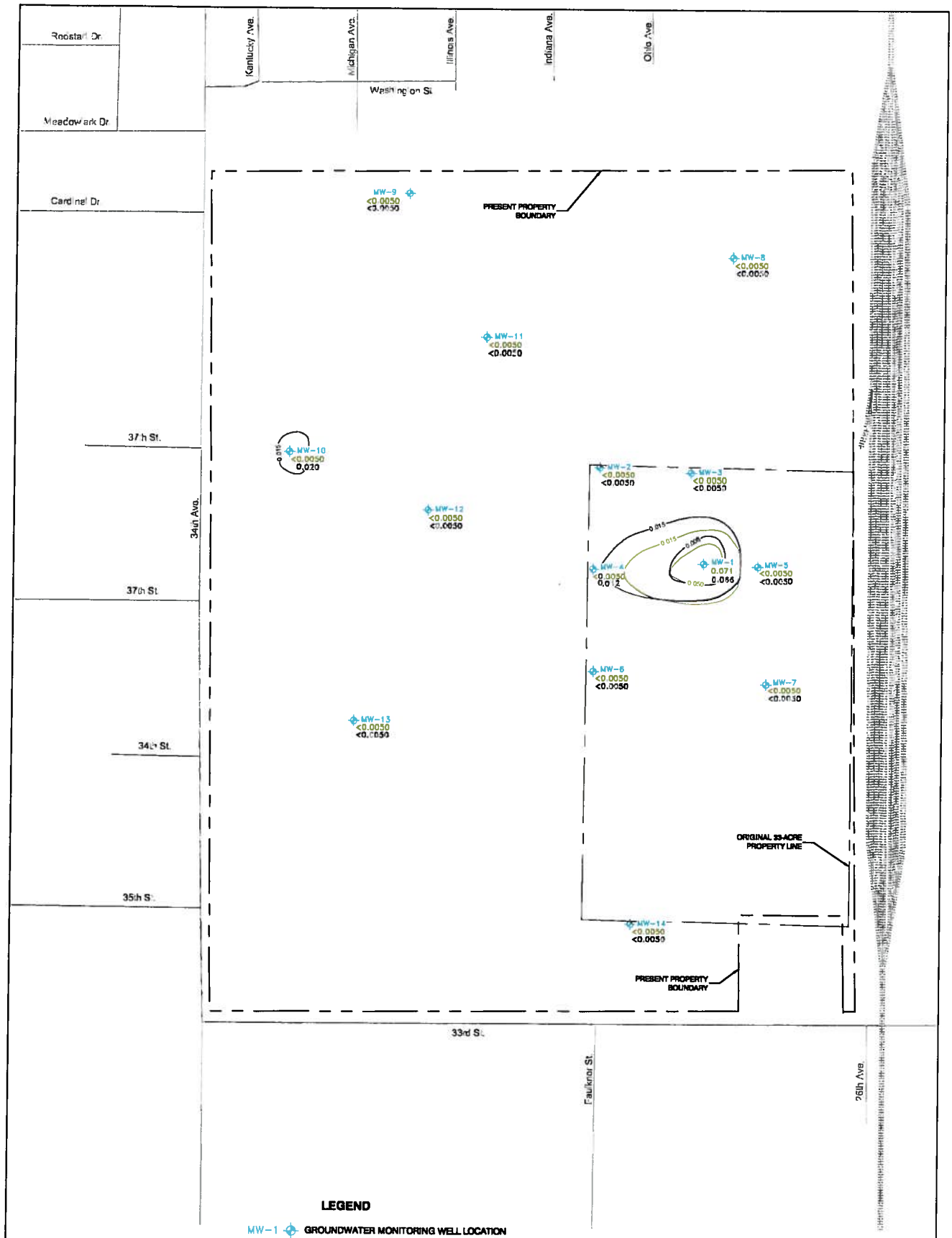
14297 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone: (228) 396-0488 | Fax: (228) 396-0497

Former Gulfport Fertilizer Site
Gulfport, MS

Lead Iso-Concentration Map
December 2 and 3, 2009

DATE: 02/19/10
SCALE: 1" = 300'
PROJECT NO. 0307
FILE:
FIGURE: 5



LEGEND

- MW-1 — GROUNDWATER MONITORING WELL LOCATION
- 0.071 — 2008 LEAD CONCENTRATION IN PARTS PER MILLION (PPM)
- 0.005 — 2008 LEAD ISO-CONCENTRATION CONTOUR
- 0.066 — 2007 LEAD CONCENTRATION IN PARTS PER MILLION (PPM)
- 0.01 — 2007 LEAD ISO-CONCENTRATION CONTOUR

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

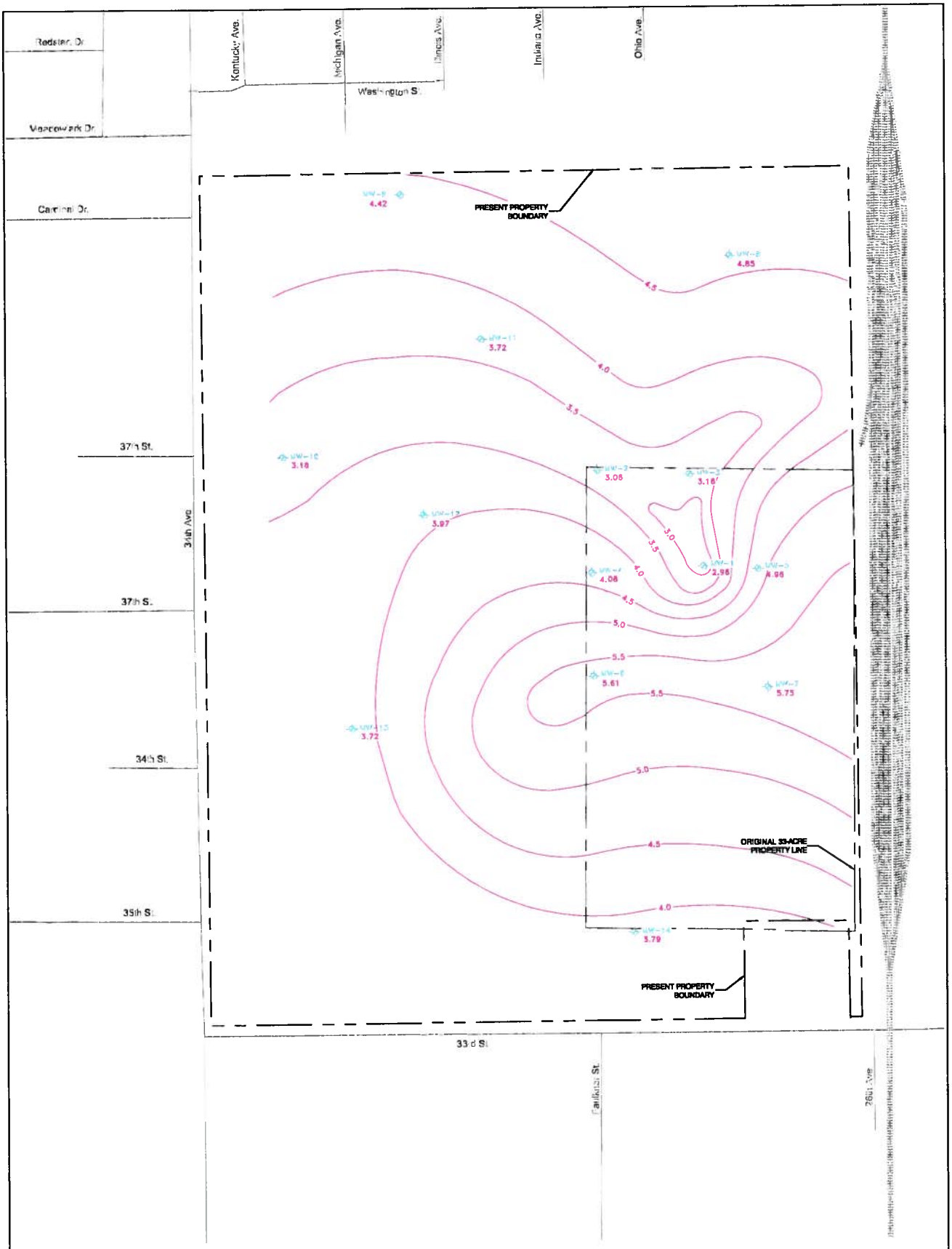
COVINGTON CIVIL & ENVIRONMENTAL, LLC

14137 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

Lead Iso-Concentration Map
December 8-9, 2008 & November 1, 2007

DATE: 02/19/10 | PROJECT NO. 6387 | FIGURE: 5A
SCALE: 1" = 300' | FILE: DWG_GULFPORT FERTILIZER\GULFPORT_EXTENDEDMAP_02-09



LEGEND

MW-14 GROUNDWATER MONITORING WELL LOCATION

3.79 pH VALUES EXPRESSED IN STANDARD UNITS

4.5 pH CONTOUR

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
14297 Dedeaux Road, Suite B | Gulfport, MS | 39503
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

pH Contour Map
December 2 and 3, 2009

DATE: 02/19/10
SCALE: 1" = 300'
PROJECT NO. 6397
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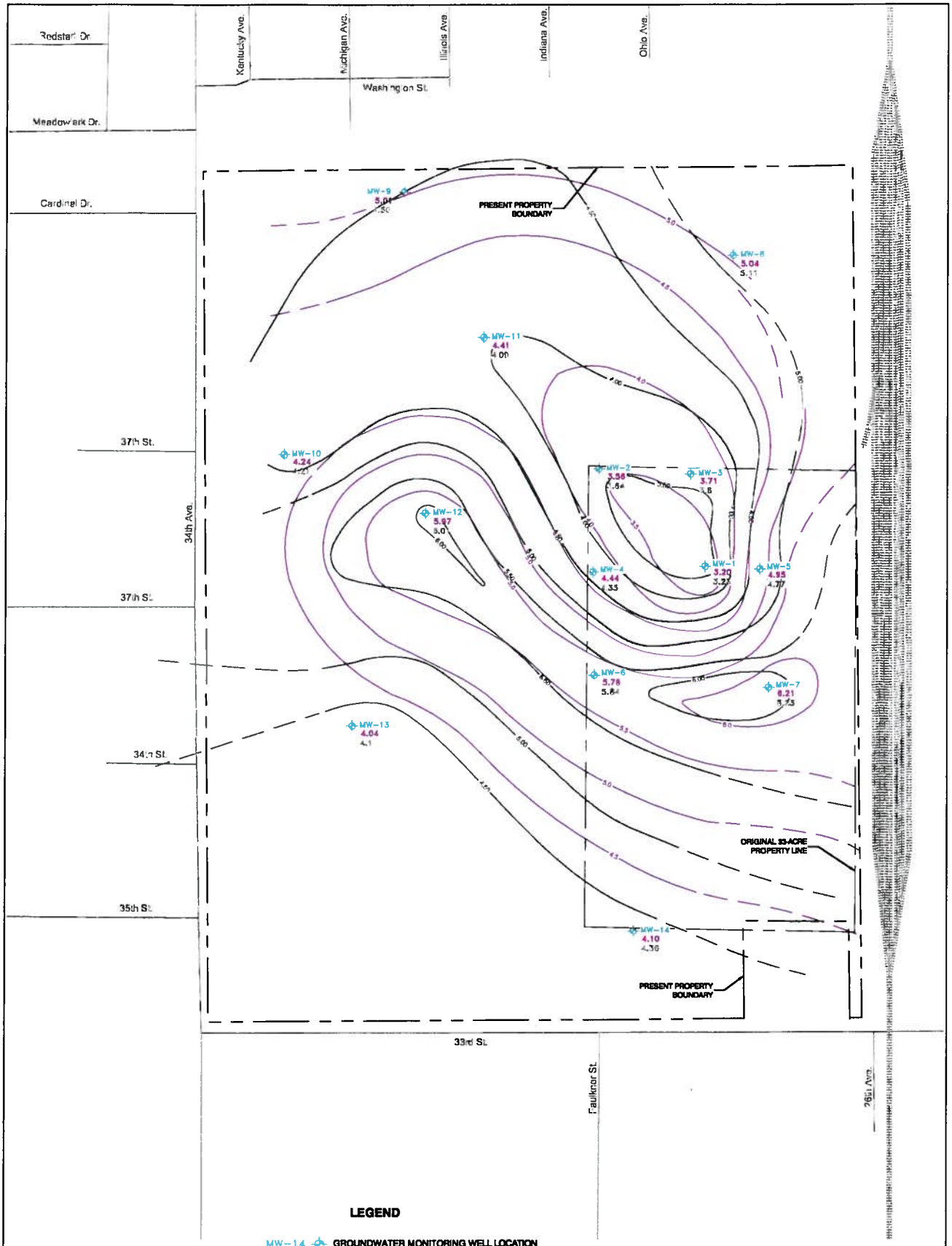
FIGURE 6



COVINGTON
CIVIL & ENVIRONMENTAL, LLC

Former Gulfport Fertilizer Site
Gulfport, MS
pH Iso-Concentration Map
December 8-9, 2008 & November 1, 2007

DATE: 02/19/10
SCALE: 1" = 300'
PROJECT NO. 0397
FILE:
FIGURE: 6A

APPENDIX A

Well Sampling Field Data Sheets

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/3/09	CAC Project No. 9397		City: Gulfport
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site		State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-1	4"	32.43	29.35	27,26	17.26	6.36	~~25.99~~ 26.07	5.73

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		1" Well		4" Well	
Well Multiplier:	0.023	Well Multiplier:	0.041	Well Multiplier:	0.653
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	3.74
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	11.22

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
12:04	0	0						
12:20	16	4	20.8	65.8	.71	2.91	407	8.5
12:24	20	5	20.8	65.6	.62	2.92	395	5.1
12:28	24	6	20.7	65.2	.59	2.93	384	4.8
12:32	28	7	20.7	64.9	.57	2.94	379	2.9
12:36	32	8	20.9	64.6	.53	2.95	374	1.5
12:38	36	8.5	21.1	64.2	.52	2.95	368	<1.0
12:40	38	9.0	21.2	63.5	.51	2.96	364	<1.0
12:42	40	9.5	21.1	63.7	.49	2.96	363	<1.0
12:44	42	10.0	21.0	64.5	.49	2.96	365	<1.0
12:45	- collected samples					2.95		
						2.96		

Signature of Field Technician:

NOTE - MW-1 Casing modified (extend up) in Oct 2007 TOC elevation noted on this data sheet reflects "newly" surveyed modification.

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12·3·09	CAC Project No.	9397	City: Gulfport
Sampler: LL / RH	CAC Project Description:	Gulfport Fertilizer Site	State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-3	2"	30.26	27.46	21.32	11.32	4.31	~~25.95~~ 25.95	11.83

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	1.93	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.79	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
11:16	START PURGE							
11:24	8	2	20.8	27.5	1.79	3.1	310	31.0
11:27	11	2.5	20.7	27.4	1.30	3.12	305	70.0
11:31	14	3.0	20.8	27.5	1.18	3.13	301	13.0
11:34	17	3.5	20.9	27.8	1.02	3.15	298	15.0
11:36	19	4.0	20.8	28.0	1.01	3.16	295	5.3
11:38	21	4.5	20.8	28.0	.92	3.16	292	7.2
*11:38	SAMPLES TAKEN							

Signature of Field Technician:

12.3.09

* 2nd set of samples taken for MDEQ @ 11:38

MW-3

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12-3-09	CAC Project No. 9397	City: Gulfport	
Sampler: LL | RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-4	2"	28.28	25.93	20.40	10.40	2.06	26.22	15.82

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	15.82	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.5	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	7.7	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Flow Rate start @ 0.25 spm

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
10:28	START PURGE							
10:43	16	3.5	20.4	62.6	0.19	4.00	154	3.1
10:46	19	4.0	20.5	63.5	.19	4.03	146	1.0
10:49	22	4.5	20.3	64.2	.19	4.05	144	1.1
10:52	26	5.0	20.6	65.4	.17	4.05	141	1.3
10:55	29	5.5	20.4	65.6	.18	4.06	140	1.2
10:59	33	6.0	20.4	65.9	.17	4.08	136	1.1
11:00 collected samples + split w/ DEQ								

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12.3.09	CAC Project No.	9397	City: Gulfport
Sampler: LL / RH	CAC Project Description:	Gulfport Fertilizer Site	State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-5	2"	32.10	29.25	23.19	13.19	5.10	27.00	13.81

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	13.81	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.6	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.8	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
12:50	Purge	START						
12:55	5	2.5	21.5	28.6	.28	4.89	159	38.7
1:00	10	3	21.5	28.6	.24	4.88	156	19.6
1:02	12	3.5	21.5	30.0	.22	4.89	155	12.1
1:04	14	4.0	21.5	30.1	.21	4.87	155	8.4
1:06	16	4.5	21.4	30.8	.22	4.87	155	8.4
1:08	18	5.0	21.5	31.4	.21	4.89	153	5.2
1:10	20	5.5	21.2	30.9	.21	4.86	154	4.2
1:12	SAMPLES TAKEN							

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/3/09	CAC Project No. 9397	City: Gulfport	
Sampler: LL/RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-6	2"	34.29	31.23	25.34	15.34	5.90	28.39	13.05

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	13.05	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.1	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.3	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
13:25	—	—						
13:31	6	2.0	19.9	22.3	1.35	5.49	109	129
13:35	10	3.0	20.2	22.5	1.16	5.54	97	59.0
13:38	13	3.5	20.2	22.0	1.09	5.56	92	52.0
13:40	15	4.0	20.3	21.8	1.06	5.58	88	44.1
13:42	17	4.5	20.3	21.8	1.00	5.59	85	42.1
13:45	20	5.0	20.1	22.1	1.00	5.59	82	36.0
13:46	21	5.5	20.2	22.1	.96	5.61	79	34.0
13:47	SAMPLES	TAKEN						

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date:	**CAC Project No.** 9397	**City:**	Gulfport
Sampler:	**CAC Project Description:** Gulfport Fertilizer Site	**State:**	MS

Field Equipment

pH Meter No.	**Serial No.**
Conductivity Meter No.	**Serial No.**
Turbidity Meter No.	**Serial No.**

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-7	2"	33.48	30.75	24.54	14.54	5.21	28.27	13.75

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	13.73	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.23	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.69	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
2:30								
2:38	8	3	21.7	46.6	.24	5.67	14	39.7
2:41	11	3.5	21.8	46.6	.22	5.70	3	34.0
2:44	14	4.0	21.8	46.6	.21	5.72	-3	25.7
2:46	16	4.5	21.8	46.7	.20	5.73	-9	19.6
2:48	18	5.0	21.7	46.9	.20	5.75	-13	17.6
2:51	21	5.5	21.7	47.0	.19	5.75	-16	13.9
2:53	23	6.0	21.7	47.0	.19	5.75	-19	14.5
2:54	SAMPLES TAKEN							

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12.2.09	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-8	2"	22.54		15.20	5.20	2.65	19.89	14.69

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	14.69	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.4	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	7.18	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
1:58	0	0						
2:07	9	3	20.4	15.7	.18	4.8	-62	
2:10	13	3.5	20.6	16.1	.17	4.83	-68	
2:13	15	4.0	20.5	16.2	0.15	4.83	-69	
2:15	17	5.0	20.5	16.4	.14	4.86	-73	
2:17	19	5.5	20.4	16.6	.12	4.84	-76	
2:19	21	6.0	20.5	16.7	.11	4.85	-78	
2:21	23	6.5	20.5	16.8	.11	4.83	-76	
2:23	25	7.0	20.4	16.8	.11	4.85	-80	
*2:25	SAMPLES TAKEN							

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12.2.09	CAC Project No. 9397		City: Gulfport
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site		State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-9	2"	22.64		16.13	6.13	3.33	19.31	15.18

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.14	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.45	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
1:03	0	0						
1:15	12	3.0	20.3	.134	.51	3.21	303	744
1:18	15	3.5	20.7	.134	.53	3.25	282	677
1:21	18	4.0	20.9	.134	.47	3.31	259	684
1:24	21	4.5	21.0	.132	.36	3.52	226	684
1:27	24	5.0	21.1	.131	.27	3.70	189	6.21
1:31	27	5.5	21.3	.130	.25	3.95	161	2.34
1:34	31	6.0	21.4	.131	.24	4.18	123	1.72
1:37	34	6.5	21.5	.132	5.94	4.42	91	1.72
1:38								

Samples Taken

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

11:06

Sampling Date: 12-2-09	CAC Project No. 9397	City:	Gulfport
Sampler: L.L. / R.H.	CAC Project Description: Gulfport Fertilizer Site	State:	MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-10	2"	27.69		19.73	9.73	5.20	22.49	12.76

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	12.76	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	26.24	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	2.08	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
11:10	0	0						
11:20	10	3.5	19.7	7.7	1.08	3.19	326	679
11:25	15	4	19.8	8.0	1.0	3.18	333	736
11:28	18	4.5	19.7	7.8	.94	3.18	334	730
11:30	20	5	19.8	7.9	.78	3.16	338	705
11:32	22	5.5	19.9	7.8	.78	3.19	338	687
11:35	25	6	19.9	7.9	.78	3.17	340	687
11:40	30	6.5	19.8	7.8	.77	3.18	340	696

Collect Samples

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12-2-09	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-11	2"	22.85		15.05	5.05	2.89	~~20~~ 19.96	14.95

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.43	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	7.31	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
2:48	0	0						
3:02	12	3.5	19.8	.114	6.27	3.32	231	8.4
3:04	14	4.0	19.9	.113	6.80	3.44	210	1.0
3:07	17	4.5	19.9	.112	1.24	3.52	188	1.0
3:10	20	5.0	20.0	.110	4.63	3.56	172	1.0
3:14	24	5.5	20.0	.110	5.71	3.69	149	1.0
3:17	27	6.0	20.0	.97	5.83	3.73	142	1.0
*3:18	SAMPLES TAKEN							

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12.2.09	CAC Project No. 9397	City: Gulfport
Sampler: L.L. / R.H.	CAC Project Description: Gulfport Fertilizer Site	State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-12	2"	28.92		20.95	10.95	4.31	24.61	13.66

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	13.6	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.23	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.6	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
12:08	0	0						
12:20	12	3	20.0	12.3	1.08	4.15	179	~~450~~
12:23	15	3.5	20.1	12.2	0.83	4.05	188	~~420~~
12:26	18	4.0	20.2	12.1	0.71	4.00	191	338
12:29	21	4.5	20.3	0.55 s/m	0.6	3.99	190	340
12:32	24	5.0	20.0	0.215 s/m	0.65	3.94	190	345
12:35	27	5.5	20.1	0.090 s/m	0.59	3.96	190	
12:38	30	6.0	20.2	.090	.57	3.98	188	
12:41	33	6.5	20.3	.090	.49	3.97	186	
*12:42								

0.25 SPM Start
Sampler 0.12 SPM
Samples Taken

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/2/09	CAC Project No. 9397	City: Gulfport	
Sampler: RH/LC	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-13	2"	32.36		24.30	14.30	4.51	27.85	13.55

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	13.55	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.2	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	6.6	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
15:47	0	—						
15:55	12	3.0	21.3	7.9	.31	3.80	297	1.1
15:59	16	3.5	21.3	7.8	.34	3.75	293	8.5
16:03	20	4.0	21.0	8.0	.36	3.76	295	2.0
16:07	24	4.5	21.1	7.9	.31	3.71	300	1.3
16:11	28	5.0	21.2	7.8	.32	3.74	301	3.2
16:14		5.5	21.2	7.8	.29	3.76	301	1.0
16:18		6.0	21.2	7.8	.28	3.72	304	1.2
16:20	→ Sampled							

Signature of Field Technician: J. Lamm

*Collected Duplicate Sample (QA) for today's wells - DUP-1

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12.3.09	CAC Project No.	9397	City: Gulfport
Sampler: LL / RH	CAC Project Description:	Gulfport Fertilizer Site	State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-14	2"	34.08		25.83	15.83	5.07	~~29.01~~	4.93

Well Casing Construction: 29.01 ff

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	4.93	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	.80	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	2.41	Min. Volume to be Purged (Gallons):	

Purging Methodology: **Sampling Information**

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
2:02	—	—						
2:07	5	1	20.8	11.2	4.26	4.32	199	25.0
2:09	7	1.5	20.7	11.1	4.10	4.09	216	12.5
2:11	9	2.0	20.7	11.1	3.99	3.95	234	17.2
2:12	10	2.25	20.7	11.0	3.90	3.92	244	10.0
2:13	11	2.50	20.5	11.1	3.85	3.85	253	9.8
2:14	12	2.75	20.5	11.0	3.81	3.79	261	8.2
2:15	13	3	20.5	11.0	3.75	3.79	264	8.2
2:16	SAMPLES TAKEN							

Signature of Field Technician:

APPENDIX B

Laboratory Analytical Report Sheets and

Chain-Of-Custody Forms

ESC
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Est. 1970

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road

Gulfport, MS 39503

Report Summary

Friday December 11, 2009

Report Number: L435201
Samples Received: 12/04/09
Client Project: 9397

Description: Gulfport Fertillzer

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Craig Cothron, ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - I-2327, CT - PH-0197, FL - E87487
GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140
NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

ESC Sample # : L435201-01

Site ID :

Sample ID : MW-10

Project # : 9397

Collected By : L. Larson
Collection Date : 12/02/09 11:40

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0012	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	BDL	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	0.0022	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-12

Collected By : L. Larson
Collection Date : 12/02/09 12:42

ESC Sample # : L435201-02

Site ID :

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0026	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	0.0069	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

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Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-9

Collected By : L. Larson
Collection Date : 12/02/09 13:38

ESC Sample # : L435201-03

Site ID :

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0014	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	BDL	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	0.0010	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-8

Collected By : L. Larson
Collection Date : 12/02/09 14:25

ESC Sample # : L435201-04

Site ID :

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.029	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	0.12	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

ESC Sample # : L435201-05

Sample ID : MW-11

Site ID :

Project # : 9397

Collected By : L. Larson
Collection Date : 12/02/09 15:18

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0018	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	BDL	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	0.0032	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit (PQL)
Note:
The reported analytical results relate only to the sample submitted.

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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

ESC Sample # : L435201-06

Sample ID : MW-13

Site ID :

Project # : 9397

Collected By : L. Larson
Collection Date : 12/02/09 16:18

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	BDL	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

ESC Sample # : L435201-07

Sample ID : DUP-1

Site ID :

Project # : 9397

Collected By : L. Larson
Collection Date : 12/02/09 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	BDL	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	0.0024	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

ESC Sample # : L435201-08

Sample ID : MW-2

Site ID :

Project # : 9397

Collected By : L. Larson
Collection Date : 12/03/09 10:11

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.024	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	0.0055	0.0050	mg/l	6020	12/09/09	5
Lead	0.0040	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	0.0066	0.0050	mg/l	6020	12/09/09	5

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

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Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

ESC Sample # : L435201-09

Site ID :

Project # : 9397

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-4

Collected By : L. Larson
Collection Date : 12/03/09 11:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.013	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	0.0028	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	0.0024	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-3

Collected By : L. Larson
Collection Date : 12/03/09 11:38

ESC Sample # : L435201-10

Site ID :

Project # : 9397

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.014	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	0.0078	0.0050	mg/l	6020	12/09/09	5
Lead	0.0012	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

ESC Sample # : L435201-11

Sample ID : MW-1

Site ID :

Project # : 9397

Collected By : L. Larson
Collection Date : 12/03/09 12:45

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.038	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	0.022	0.0050	mg/l	6020	12/09/09	5
Lead	0.048	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	0.043	0.0050	mg/l	6020	12/09/09	5

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
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REPORT OF ANALYSIS

Mr. Lars Larson
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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

ESC Sample # : L435201-12

Site ID :

Project # : 9397

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-5

Collected By : L. Larson
Collection Date : 12/03/09 13:12

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	0.0017	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

ESC Sample # : L435201-13

Site ID :

Project # : 9397

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-6

Collected By : L. Larson
Collection Date : 12/03/09 13:47

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.026	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	0.024	0.0050	mg/l	6020	12/09/09	5
Lead	0.0055	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

ESC Sample # : L435201-14

Site ID :

Project # : 9397

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-14

Collected By : L. Larson
Collection Date : 12/03/09 14:16

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	BDL	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	0.0015	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
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REPORT OF ANALYSIS

Mr. Lars Larson
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14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

ESC Sample # : L435201-15

Site ID :

Project # : 9397

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : MW-7

Collected By : L. Larson
Collection Date : 12/03/09 14:54

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.013	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.0050	mg/l	6020	12/09/09	5
Lead	BDL	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	12/09/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

December 11, 2009

ESC Sample # : L435201-16

Site ID :

Project # : 9397

Date Received : December 04, 2009
Description : Gulfport Fertillzer

Sample ID : DUP-2

Collected By : L. Larson
Collection Date : 12/03/09 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.025	0.0010	mg/l	6020	12/10/09	1
Arsenic,Dissolved	BDL	0.010	mg/l	6020	12/09/09	10
Lead	0.0039	0.0010	mg/l	6020	12/10/09	1
Lead,Dissolved	BDL	0.010	mg/l	6020	12/09/09	10

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

Attachment A
List of Analytes with QC Qualifiers

Sample Number	Work Group	Sample Type	Analyte	Run ID	Qualifier
L435201-01	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-02	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-03	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-04	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
	WG454177	SAMP	Lead,Dissolved	R1029208	O
L435201-05	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-06	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
	WG454177	SAMP	Lead,Dissolved	R1029208	O
L435201-07	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-09	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-10	WG454177	SAMP	Lead,Dissolved	R1029208	O
L435201-12	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-14	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-15	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
L435201-16	WG454177	SAMP	Arsenic,Dissolved	R1029208	O
	WG454177	SAMP	Lead,Dissolved	R1029208	O

Attachment B
Explanation of QC Qualifier Codes

Qualifier	Meaning
O	(ESC) Sample diluted due to matrix interferences that impaired the ability to make an accurate analytical determination. The detection limit is elevated in order to reflect the necessary dilution.

Qualifier Report Information

ESC utilizes sample and result qualifiers as set forth by the EPA Contract Laboratory Program and as required by most certifying bodies including NELAC. In addition to the EPA qualifiers adopted by ESC, we have implemented ESC qualifiers to provide more information pertaining to our analytical results. Each qualifier is designated in the qualifier explanation as either EPA or ESC. Data qualifiers are intended to provide the ESC client with more detailed information concerning the potential bias of reported data. Because of the wide range of constituents and variety of matrices incorporated by most EPA methods,it is common for some compounds to fall outside of established ranges. These exceptions are evaluated and all reported data is valid and useable unless qualified as 'R' (Rejected).

Definitions

Accuracy - The relationship of the observed value of a known sample to the true value of a known sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, surrogate recoveries, etc.

Precision - The agreement between a set of samples or between duplicate samples. Relates to how close together the results are and is represented by Relative Percent Differrence.

Surrogate - Organic compounds that are similar in chemical composition, extraction, and chromotography to analytes of interest. The surrogates are used to determine the probable response of the group of analytes that are chemically related to the surrogate compound. Surrogates are added to the sample and carried through all stages of preparation and analyses.

TIC - Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.

Summary of Remarks For Samples Printed
12/11/09 at 10:48:18

TSR Signing Reports: 034
R5 - Desired TAT

Sample: L435201-01 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-02 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-03 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-04 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-05 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-06 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-07 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-08 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-09 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-10 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-11 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-12 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-13 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-14 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-15 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

Sample: L435201-16 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/11/09 00:00 RPT Date: 12/11/09 10:47

ESC
L·A·B S·C·I·E·N·C·E·S
YOUR LAB OF CHOICE

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road

Gulfport, MS 39503

Report Summary

Monday December 21, 2009

Report Number: L436536
Samples Received: 12/04/09
Client Project: 9397

Description: Gulfport Fertillzer

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Craig Cothron, ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - I-2327, CT - PH-0197, FL - E87487
GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375,DW21704, ND - R-140
NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910

ESC
L·A·B S·C·I·E·N·C·E·S
YOUR LAB OF CHOICE

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
14257-B Dedeaux Road
Gulfport, MS 39503

December 21, 2009

Date Received : December 04, 2009
Description : Gulfport Fertillzer

ESC Sample # : L436536-01

Sample ID : MW-8

Site ID :

Project # : 9397

Collected By : L. Larson
Collection Date : 12/02/09 14:25

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Lead	0.15	0.0050	mg/l	6010B	12/15/09	1
Lead,Dissolved	BDL	0.0050	mg/l	6010B	12/18/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/21/09 09:53 Printed: 12/21/09 09:53

Summary of Remarks For Samples Printed
12/21/09 at 09:53:50

TSR Signing Reports: 034
R5 - Desired TAT

Sample: L436536-01 Account: COVASSOC Received: 12/04/09 09:00 Due Date: 12/21/09 00:00 RPT Date: 12/21/09 09:53
Relogged from L435201-04

Covington & Associates

14257-B Dedeaux Road
Gulfport,MS 39503

Billing information:

Mr. Lars Larson
14257-B Dedeaux Road
Gulfport,MS 39503

Email: larslarson@bellsouth.net
lars@covingtonassociates.net

Report to: **Mr. Lars Larson**

Project Description: **Gulfport Fertillzer**

City/State Collected: Gulfport, MS

Phone: (228) 396-0486
FAX:

Client Project #: 9397

Lab Project #: **COVASSOC-GULFPORT**

Collected by (print): L. Larson

Site/Facility ID#:

P.O.#:

Collected by (signature):

Immediately Packed on Ice N ___ Y ✓

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day.....100%
___ Two Day.....50%
___ Three Day.....25%

Date Results Needed

Email? ___No X Yes
FAX? ___No ___Yes

Analysis/Container/Preservative

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDG, PBG 500ml HDPE-NoPres	ASG, PBG 500ml HDPE-HNO3
MW-10	GRAB	GW	—	12/2/09	1140	2	X	X
MW-12		GW	—		1242	2	X	X
MW-9		GW	—		1338	2	X	X
MW-8		GW	—		1425	2	X	X
MW-11		GW	—		1518	2	X	X
MW-13		GW	—		1619	2	X	X
DUP-1		GW	—		—	2	X	X
		GW				2	X	X
		GW				2	X	X

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

Remarks:

pH _____ _____ Temp _____

Flow _____ Other _____

Chain of Custody
Page 1 of 2

ESC LABS
12065 Lebanon Road
Mt. Juliet, TN 37122

Phone: (800) 767-5859
Phone: (615) 758-5858
Fax: (615) 758-5859

B230

Acctnum: COVASSOC (lab use only)
Template/Prelogin: TS4821 / P302681
Cooler#: IT-NA
Shipped Via: FedEx Ground

Remarks/Contaminant | Sample # (lab only)

Standard-TAT 12/15/09

1436536-01

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
	12/3/09	1545	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)

Samples returned via: ☐ UPS ☑ FedEx ☐ Courier ☐

Temp: 0.4 Bottles Received: 32

Date: 12/4/09 Time: 0900

Condition: OK (lab use only)

COC Seal Present: ___ Y ___ N ___ NA

pH Checked: 12 NCF

Covington & Associates

14257-B Dedeaux Road
Gulfport,MS 39503

Billing information:

Mr. Lars Larson
14257-B Dedeaux Road

Gulfport,MS 39503

Analysis/Container/Preservative

Chain of Custody
Page 2 of 2

ESC LAB SCIENCES
12065 Lebanon Road
Mt. Juliet, TN 37122
Phone: (800) 767-5859
Phone: (615) 758-5858
Fax: (615) 758-5859

Report to: Mr. Lars Larson

Email: lars larsone bellsouth.net lars@covingtonassociates.net

Project Description: Gulfport Fertillzer

City/State Collected: Gulfport, MS

Phone: (228) 396-0486
FAX:

Client Project #: 9397

Lab Project #: COVASSOC-GULFPORT

Collected by (print): L. Larson

Site/Facility ID#:

P.O.#:

Collected by (signature):

Immediatly Packed on Ice N ___ Y ___

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day.....100%
___ Two Day 50%
___ Three Day 25%

Date Results Needed

Email? ___No X Yes
FAX? ___No ___Yes

Acctnum: COVASSOC (lab use only)
Template/Prelogin: T54821/P302681
Cooler #: 11-19
Shipped Via: FedEX Ground

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDG, PBDG 500mlHDPE-NoPres	ASG, PBG 500mlHDPE-HNO3	Remarks/Contaminant	Sample # (lab only)
MW-2	GRAB	GW	—	12/3/09	10:11	2	X	X		-08
MW-4		GW	—		11:00	2	X	X		-09
MW-3		GW	—		11:38	2	X	X		-10
MW-1		GW	—		12:45	2	X	X		-11
MW-5		GW	—		13:12	2	X	X		-12
MW-6		GW	—		13:47	2	X	X		-13
MW-14		GW	—		14:16	2	X	X		-14
MW-7			—		14:54					-15
DUP-2			—		—					-16

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

Remarks:

pH _____ Temp _____

Flow _____ Other _____

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
	12/3/09	1545	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)

Samples returned via: ☐ UPS ☐ FedEx ☐ Courier ☐ ____
Temp: 4.1 Bottles Received: 32
Date: 12-4-09 Time: 0900

Condition: (lab use only)
COC Seal Intact: Y N NA
pH Checked: L2
NCF:

COVINGTON CIVIL & ENVIRONMENTAL, LLC

2200-A 25TH AVENUE
GULFPORT, MS 39501

PHONE (228) 396-0486
FAX (228) 396-0487
E-MAIL LARSLARSON28@GMAIL.COM

August 11, 2011

FILE

RECEIVED
SEP 2 2011
Dept of Environmental Quality

Ms. Leighton Janes
Office of Pollution Control
Mississippi Department of Environmental Quality
Groundwater Assessment & Remediation Division
Jackson, Mississippi 39289-0385

Re: Comprehensive Groundwater Monitoring Report – June 2011
Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi
CCE Project No. 9397

Dear Mr. Janes:

On June 27, 28 and 29, 2011, Covington Civil & Environmental, LLC (CCE) conducted the sixth (6th) comprehensive groundwater sampling event of all 14 monitoring wells at the site and the fourth (4th) comprehensive sampling event per the Mississippi Department of Environmental Quality (MDEQ) approved "Compliance Monitoring Program" of February 2009. The Compliance Monitoring Program stipulates that semi-annual groundwater sampling of all wells take place for three (3) years. This particular assessment report documents the conditions of the groundwater in late June 2011, as well as changes in groundwater quality and the potentiometric fluctuations of all site monitoring wells. This report further documents the abandonment of MW-14 and the installation of a replacement well MW-14(A), prior to the comprehensive sampling event. The abandonment of MW-14 and the installation of the replacement well were conducted to assist the Mississippi State Port Authority with its development plans for an Emergency Storage Facility at the site. A USGS Topographic Quadrangle Map illustrating the location of the former Gulfport Fertilizer site is included as Figure 1.

BACKGROUND

In 2001, CCE initiated the groundwater assessment program for the former Gulfport Fertilizer site. Following the MDEQ's approval of Hancock Bank's Corrective Action Program and the beginning of the semi-annual sampling events, the principal changes that have occurred with respect to the groundwater assessment program have been the abandonment of MW-8 and MW-14, and the replacement of those wells with MW-8(A) and MW-14(A).

In May 2010, due to repeated incidents of poor groundwater quality (i.e. very high turbidity) in the water evacuated from this well, CCE oversaw the plugging and abandonment of MW-8 and the installation of the replacement well (MW-8A) immediately adjacent to it. Post-installation well development of MW-8A produced excellent water quality with very low turbidity. The sampling events of December 2010 and June 2011 confirm excellent field water quality conditions (low turbidity, etc.) at this well in addition to laboratory analytical data that yielded non-detectable concentrations of lead and arsenic. In this regard, the field parameters and lab

data demonstrate that the abandonment of MW-8 and the installation of MW-8A were beneficial steps in the acquisition of consistent groundwater quality information for the overall site.

With respect to MW-14, CCE oversaw the abandonment of this well location only because of its location. The Mississippi State Port Authority is planning on constructing an Emergency Storage Facility at the subject site. MW-14 had to be relocated since its location will conflict with proposed site improvements. Since MW-14 was a background monitoring well located in an un-impacted area of the overall site, a location just inside the main entrance in another area known to be un-impacted by historical activities was selected for the replacement well (MW-14A) location. MW-14 was abandoned using the over drill technique required by the MDEQ. A replacement well (MW-14A) was installed inside the existing main access gate on the south side of the site. Once all well materials had been removed from MW-14 and the borehole properly over drilled, a neat bentonite/cement slurry was poured into the bore hole to properly close and seal it. The installation of the replacement well (MW-14A) employed the same techniques used to install most of the previous site wells including the use of 6.5-inch hollow-stem augers to advance borings and allow sufficient annular space for the placement of a slightly larger sand filter pack. The well itself was constructed of a two-inch diameter casing with 10-feet of 0.10" slotted screen. Well completion materials included the placement of a fine graded sand filter pack to two-feet above the screened interval, followed by the construction of a two-foot bentonite pellet seal on top of the filter pack. MW-14(A), like the other wells, is a stand up completion with a 3' x 3' concrete well pad, locking well expansion cap, and steel bumper posts on the corners. Since its installation, MW-14(A) has been surveyed, and its location designated on the referenced site maps. A monitoring well location map is included as Figure 2.

MONITORING WELL SAMPLING

Prior to monitoring well purging and sampling, CCE measured groundwater levels in each of the 14 monitoring wells. This was conducted to calculate the elevation of the potentiometric surface and to determine the well volume of each well so that an appropriate amount of groundwater would be purged prior to sampling. These groundwater elevations are listed in Table 1.

After recording the groundwater level, dedicated sample tubing was lowered into the well and positioned in approximately the middle of the water column. The sampling pump was then activated and field parameters (temperature, conductivity, pH and field turbidity) were monitored during purging. Purging continued until three (3) consecutive readings did not vary more than 0.5^0 C (field temperature), 3% (conductivity) and 0.1 standard units (pH). Field water quality measurements and parameters were recorded on a "Well Sampling Field Data Sheet" for each monitoring well. Copies of the "Well Sampling Field Data Sheet" for each monitoring well are included in Appendix A.

Once well purging was completed, groundwater samples were collected from each monitoring well. As part of the quality control program for this site, duplicate samples were also collected.

One duplicate sample was collected from the set of seven newly installed wells and one from the original set of seven wells. Additionally, an Equipment "Rinsate" Blank was collected during field activities to document that field decontamination procedures were conducted appropriately. Each sample was labeled and placed in a cooler with ice to maintain 4^0 C. Required information was recorded on the Sample Chain-of-Custody forms, included in Appendix B. The cooler was shipped to Environmental Science Corporation, Mt. Juliet, TN for analysis. Each sample was analyzed for total and dissolved arsenic and lead. The analytical results and field groundwater pH measurements are summarized in Table 2 (arsenic analyses), Table 3 (lead analyses), and Table 4 (pH measurements). The Laboratory Analytical Report Sheets and Chain-of-Custody forms are included in Appendix B.

POTENTIOMETRIC SURFACE

June 2011 Potentiometric Surface

Figure 3 illustrates the potentiometric surface of the surficial aquifer at the Gulfport Fertilizer site during the June 2011 sampling event. Table 1 also lists the groundwater elevations for each of the monitoring wells, as well as historical averages and changes in the potentiometric head over time. The groundwater elevation contours illustrated for the June 2011 sampling event are generally consistent with those shown during most of the previous sampling events. An interesting observation about the June 2011 potentiometric surface map is a very slight decline in the overall groundwater elevation at MW-14(A) relative to a historically consistent high area between MW-7 and MW-6. Previous groundwater maps did not depict any elevation contours for this portion of the site as specific information did not exist.

Given the abandonment of MW-14 and the installation of MW-14(A), a groundwater elevation can now be shown at a slightly lower elevation within this portion of the site. Still, the primary observation of the June 2011 potentiometric surface map is that a consistent groundwater flow direction (north to northwest) and a potentiometric gradient (less than 1%) continues to exist at this site. The historical average of the potentiometric gradient at this site is approximately 0.005 feet/foot, with the June 2011 sampling event confirming a generally equivalent gradient of roughly 0.006 feet/foot. This slight increase in gradient; especially apparent in the newly annexed portion of the property between MW-2 and MW-9 is most likely due to the drought conditions that existed along the Gulf Coast during the late Spring and early Summer of 2011. The minimal amount of measurable precipitation during this period is very evident in this newly acquired portion of the site as groundwater elevation gradient between MW-2 and MW-11 was observed at roughly 1.2%, or 0.123 feet/foot. Groundwater elevation contours within the rest of the overall site remain very consistent in shape and attitude.

LABORATORY ANALYTICAL RESULTS

Arsenic Concentrations

Table 2 presents the historical arsenic concentrations for groundwater samples collected from all of the wells at the site. Arsenic concentrations have been compared to the MDEQ's Tier 1 Groundwater MCL of 0.010 mg/L.

As the data in Table 2 confirms, measurable concentrations of arsenic "at or exceeding" the Tier 1 TRG level are consistently reported at wells almost exclusively within the original 33-acre portion of the property: namely MW-1, MW-2, MW-3, MW-6 and MW-7. Arsenic concentrations most recently reported at these wells ranged from 0.010 mg/L at MW-1 and MW-6 to 0.020 mg/L at MW-2. Historical groundwater data has reported the highest arsenic concentrations in the groundwater to be in a small zone around MW-1, MW-2 and MW-3. The data from this most recent sampling event again confirms this to be the case, however, with slightly higher arsenic concentrations being found at MW-2 and MW-3. Slight to fairly significant variations in arsenic concentrations amongst these three wells have occurred since they were installed in 2002, but the same primary "core zone" of arsenic concentrations that exceed the Tier 1 TRG standard remain within this area. Arsenic levels within the annexed portion of the overall property reported some minor detections, but all of these concentrations are significantly lower than the Tier 1 TRG Level of 0.010 mg/L.

Figure 4 illustrates the arsenic iso-concentrations from the most recent sampling event. The most revealing aspect of the arsenic plume is that the overall size and shape is significantly reduced from the previous 3 to 4 sampling events. Areas of the plume in the northern and central areas of the original 33-acre site reflect consistent arsenic detections near MW-2 and MW-3 (north) and MW-6 and MW-7 (south-central), but the most recent sampling event reveals a clear reduction in arsenic concentrations through the portion of the site marked by MW-4, MW-1 and MW-5. Differences in the plume size and shape in this area could well be the result of geochemical changes in the surficial aquifer caused by the drought conditions during June 2011, and/or a function of a reduced vertical groundwater gradient as a result of the clay CAP construction. In either case, the most recent analytical data demonstrates that the arsenic plume, although continuing to "morph" in overall shape and character, does consistently remain primarily confined to the original 33-acre portion of the Gulfport Fertilizer Site. Analytical data from the monitoring wells within the annexed portion of the site are either below the respective reporting limit or at concentrations significantly lower than the Tier 1 TRG Levels.

Lead Concentrations

Table 3 presents the historical lead concentrations for groundwater samples collected from each of the fourteen monitoring wells. The MDEQ's Tier 1 TRG for lead of 0.015 mg/L (also a Federal MCL) has consistently been used for the comparison of lead concentrations detected in

the groundwater at this site. Table 3 confirms that the only monitoring well that consistently exceeds the Tier 1 TRG for lead is MW-1. The most recent sampling event of June 2011 reports a total lead concentration at MW-1 of 0.13 mg/L, a slight increase from the lead concentration reported in December 2010 of 0.072 mg/L. All other monitoring wells reported total lead concentrations that were less than the Tier 1 TRG. The only anomaly or slightly abnormal lead concentration was reported at MW-12 with a total lead concentration of 0.014 mg/L, just below the TRG Level 0.015 mg/L. During well purging and sampling, turbidity levels were exceedingly high (i.e. too high for instrumentation to accurately record). Past issues with excessively high turbidities have also been observed at this monitoring well location, so close attention will have to be paid during future sampling events. Since monitoring wells within the original site and the outer perimeter (interceptor) wells report total lead levels that are significantly lower than the Tier 1 TRG, the recent spike in lead concentrations at MW-12 appears to be more of an isolated anomaly rather than a result of an extended plume. Furthermore, the dissolved lead concentration of MW-12 reported at 0.0010 mg/L is additional evidence that the increase in the "total lead" concentration at this location is the result of colloidal transport of excessive suspended solids within the water column. Figure 5 illustrates the lead iso-concentration lines in the groundwater for the June 2011 sampling event. This figure illustrates that elevated lead concentrations above the 0.015 mg/L Tier 1 TRG remain within the area of the original fertilizer site; specifically in the area closest to MW-1.

pH Levels

Historical pH levels from each of the groundwater sampling events are recorded in Table 4. Additionally, Figure 6 illustrates the pH contours for data collected during the June 2011 sampling event.

As in all of the previous sampling events, the primary zone of depressed pH (pH < 4.0), as Figure 6 illustrates, remains within the area defined by MW-1, MW-2 and MW-3. The pH levels reported at MW-10, MW-11 and MW-13 ranged from 4.0 to 4.3, but have in past sampling events been reported just below 4.0. As in the December 2011 sampling event, the pH levels reported during the June 2011sampling event confirm another slight increase in pH levels, but in all of the monitoring wells. These pH increases, as reported in December 2011, were relatively small and appear to represent upward fluctuation of between one-quarter and one-half of a Standard Unit. In spite of these gradual upward increases in the overall groundwater pH, the primary observation is that the core area of depressed pH remains generally within the original 33-acre portion of the former Gulfport Fertilizer site (i.e. around MW-1, MW-2 and MW-3). Now that MW-14 has been abandoned, and MW-14(A) installed, additional background water quality information is available from the very southeastern portion of the original 33-acre site. Data from MW-14(A), and previously from MW-14, establish that slightly depressed naturally occurring pH already exists in peripheral areas of the overall site. As previously commented, small pH fluctuations have occurred in all of the monitoring wells at this site, and most likely will continue to take place over time. Nevertheless, what this information reveals more clearly (as

the groundwater monitoring program advances) is that the documented fluctuations in the groundwater pH that have occurred since the original wells were installed in 2002 have had no measurable effect on the lead or arsenic concentrations across this site.

CONCLUSIONS

CCE makes the following conclusions regarding the groundwater data reported during the June 2011 sampling event, and the data collected since the first seven wells were installed in 2002.

- The June 2011 water levels recorded a significantly lower potentiometric surface than the past few sampling events. Water levels for wells within the CAP fluctuated between approximately two-feet to three-feet lower than levels in December 2010. However, wells within the newly annexed portions of the site (particularly those in the deepest part of the forested "wetlands" area) reported water levels that have fallen from almost three-feet to over six-feet. This dramatic decline in the overall potenitiometric surface can be largely attributed to the drought conditions that existed in the Gulf Coast during the late spring to early summer of 2011. The overall groundwater flow direction has not changed and continues to be toward the north to northwest. The potentiometric gradient also remains very consistent with historic recordings.

- The vast majority of reported total arsenic concentrations remain within the confines of the original 33-acres site. Total arsenic concentrations at MW-1, MW-2 and MW-3 continue to be the locations of the consistent exceedances of the Tier 1 TRG standard. The recent total arsenic concentrations at MW-4 (0.0081 mg/L) and MW-5 (0.0015 mg/L) cause the overall shape of the arsenic plume to be "pinched" somewhat and could reflect a diminishing plume size. Based on slight historical arsenic exceedances at these locations however, the arsenic plume shape for June 2011 is most likely a reflection of periodic concentration declines along plume periphery, and not a significant total arsenic decline as a mere review of the last two sampling events might suggest. Sustained arsenic fluctuations at wells within the original 33-acre site will continue to show slight modifications to the overall iso-concentration configuration over time. Nevertheless, data reported at the outer perimeter wells (MW-8 through MW-14) confirm that overall arsenic plume is generally immobile.

- Total lead concentrations have remained very consistent and continue to demonstrate immobility of the small lead plume. The area of elevated total lead above the MCL of 0.015 mg/L remains in the area immediately surrounding MW-1. The recent total lead spike at MW-12 of 0.014 mg/L can be readily explained by excessive turbidity during sampling, since the dissolved lead concentration from this well was reported at 0.0010 mg/L and other wells in the area with much lower field turbidity readings reported significantly lower total lead concentrations.

- Minor pH fluctuations at all of the monitoring wells locations have been observed since the beginning of groundwater assessment activities in 2002. As previously mentioned, these pH fluctuations seem to be most readily influenced by result of seasonal water level variations (i.e. drought periods vs. periods of excessive rainfall). Even with these recorded pH fluctuations over time, laboratory data collected over the past 9-years does not show any apparent changes in the total lead or total arsenic concentrations in the groundwater. The pH iso-concentration map for the June 2011 is fairly consistent with the pH maps generated during the previous six sampling events.

Based on the February 2009 approval letter of the Compliance Monitoring Program for the Gulfport Fertilizer Site, Hancock Bank has now completed four rounds of semi-annual sampling. Two additional rounds of groundwater monitoring will be required to complete the "three-year" semi-annual assessment program of "all" the site's monitoring wells. At this time, CCE anticipates that the fifth comprehensive sampling event of all monitoring wells will take place in December 2011.

If you have any questions regarding this report, please contact us.

Very truly yours,
Covington Civil & Environmental, LLC

Lars Larson, P.G.
Senior Geologist

John F. Szabo, P.E.
Managing Principal

ENCLOSURES

cc: Mr. Tony Russell, OPC - MDEQ
Mr. Delma Powell, Hancock Bank

LIST OF TABLES

Table 1
Groundwater Elevations

Historical Groundwater Sampling Events
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	23.61	20.99	21.84	23.35	23.89	25.09	25.51
12/12/2002	26.01	23.11	24.14	25.66	26.26	27.32	27.65
12/5-9/2002	26.37	23.55	24.82	26.06	26.58	27.77	28.26
4/2/2003	25.95	23.39	24.64	25.78	26.20	27.45	27.76
6/12/2003	27.15	25.58	27.00	26.16	27.48	28.35	29.12
9/11/2003	27.03	23.83	25.26	26.20	27.21	28.17	28.82
12/2/2003	25.47	22.92	23.63	25.52	25.72	26.79	26.78
3/4/2004	27.53	24.23	26.02	26.3	27.9	28.37	29.46
2/17/2006	25.86	23.65	24.68	25.78	26.03	27.28	27.19
11/1/2007	26.23	23.65	25.17	26.13	27.00	28.34	28.83
12/9/2008	24.37	21.52	22.41	24.37	24.41	25.79	25.6
12/2/2009	26.07	25.1	25.95	26.22	27.00	28.39	28.27
6/14-15/2010	25.59	23.12	24.38	25.43	26.34	27.79	28.03
12/1-2/2010	24.31	22.69	23.04	25.16	25.18	26.78	26.53
6/27-29/2011	22.02	19.46	20.61	22.13	22.77	23.99	24.41
Max. Elevation	27.53	25.58	27	26.3	27.9	28.37	29.46
Min. Elevation	23.61	20.99	21.84	23.35	23.89	25.09	25.51
Head Fluctuation	3.92	4.59	5.16	2.95	4.01	3.28	3.95
POT Average	26.12	23.49	24.72	25.69	26.43	27.49	27.94

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14	MW-14(A)
11/1/2007	19.21	18.45	22.39	19.25	24.22	26.56	28.88	
12/9/2008	18.47	15.11	20.39	17.42	21.02	24.66	25.89	
12/2/2009	19.89	19.31	22.49	19.96	24.61	27.85	29.01	
6/14-15/2010	19.1	17.69	21.94	18.88	23.69	26.06	28.33	
12/1-2/2010	19.62	16.79	20.78	18.88	21.80	25.36	26.41	
6/27-29/2011	15.23	12.05	18.09	12.1	18.72	22.16	Abandoned	23.85
Max. Elevation	19.21	18.45	22.39	19.25	24.22	26.56	28.88	
Min. Elevation	18.47	15.11	20.39	17.42	21.02	24.66	25.89	
Head Fluctuation	0.74	3.34	2.0	1.83	3.2	1.9	2.99	
POT Average	19.26	17.47	21.60	18.88	23.07	26.10	27.70	23.85

Note: All groundwater elevations in feet, mean sea level (ft., msl).
Monitoring Wells 8 through 14 were installed in October 2007.
MW-8(A) was installed in May 2010 (immediately adjacent to) and as a replacement of MW-8. Consequently, water level elevations from June 2010 and all subsequent dates are reflective of MW-8(A).
MW-14(A) was installed in June 2011 as a replacement of MW-14 (abandoned in June 2011). This is a different location from MW-14, consequently, the groundwater data colleted from MW-14(A) will be unique to this new location.

Table 2
Arsenic Concentrations

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	<0.010	0.054	0.011	0.035	<0.010	0.016	<0.010
1-Duplicate	0.018			<0.010	<0.010		
12/12/2002	<0.010	0.073	<0.010	<0.010	<0.010	0.061	<0.010
2-Duplicate		0.095	<0.010	0.039	<0.010	0.041	
12/5-9/2002	0.018	0.052	<0.010	0.048	<0.010	0.030	0.017
3-Duplicate				0.050		0.034	
4/2/2003	<0.010	0.031	<0.010	0.019	<0.010	<0.010	<0.010
4-Duplicate	<0.010	0.051	<0.010	0.016	<0.010	<0.010	0.014
6/12/2003	0.021	0.019	<0.010	0.057	<0.010	0.032	0.011
5-Duplicate	0.018	0.016	NS	0.050	<0.010	0.031	0.011
9/11/2003	0.012	0.029	<0.010	0.055	<0.010	0.028	<0.010
6-Duplicate	0.022	0.026	0.011	0.053	<0.010	0.032	0.012
12/2/2003	0.030	0.090	0.014	0.050	<0.010	0.028	0.014
7-Duplicate	0.022	0.089	<0.010	0.047	<0.010	0.024	0.012
3/4/2004	<0.010	0.100	<0.010	0.053	<0.010	0.025	<0.010
8-Duplicate	0.012	0.082	<0.010	0.042	<0.010	0.018	<0.010
2/17/2006	0.017	0.100	0.012	0.049	<0.010	0.028	0.010
9-Duplicate						0.027	
11/1/2007	0.052	0.064	0.015	0.035	0.011	0.024	0.018
10-Duplicate		0.063					0.019
12/9/2008	0.044	0.079	0.022	0.012	<0.010	0.024	0.017
11-Duplicate							0.017
12/2/2009	0.038	0.024	0.014	0.013	<0.0010	0.026	0.013
12-Duplicate		0.025					
6/14-15/2010	0.053	0.014	<0.010	0.019	<0.010	0.022	0.011
13-Duplicate	0.053						
12/1-2/2010	0.021	0.018	0.015	0.0098	<0.0010	0.015	0.0036
14-Duplicate		0.019					
6/27-29/2011	0.010	0.020	0.013	0.0081	0.0015	0.010	0.011
15-Duplicate						0.011	
Average	0.030	0.049	0.015	0.036	0.011	0.026	0.013

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14	MW-14(A)
11/1/2007	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	
10-Duplicate	<0.010					<0.010		
12/9/2008	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	
11-Duplicate						<0.010		
12/2/2009	0.029	0.0014	0.0012	0.0018	0.0026	<0.0010	<0.0010	
12-Duplicate						<0.0010		
6/14-15/2010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	
13-Duplicate						<0.010		
12/1-2/2010	<0.0010	<0.0010	<0.0010	0.0013	0.0018	<0.0010	<0.0010	
14-Duplicate		<0.0010						
6/27-29/2011	0.0022	0.0027	0.0011	0.0027	0.0043	<0.0010	Abandoned	0.0020
15-Duplicate		0.0027						
Average	0.029	0.001	0.001	0.0016	0.0022	<0.010	<0.010	<0.010

Notes:

1. All arsenic concentrations in mg/l.
2. Arsenic concentrations in bold represent positive detections above the laboratory detection limit.
3. Arsenic concentrations exceeding MDEQ Tier 1 Groundwater MCL for arsenic (0.010 mg/l) are shaded.

Table 3
Lead Concentrations

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	0.020	0.0074	0.0087	0.016	<0.0050	<0.0050	<0.0050
1-Duplicate	0.015			0.014	<0.0050		
12/12/2002	0.014	<0.0050	<0.0050	0.0053	0.012	0.017	0.0062
2-Duplicate		0.011	0.011	0.016	0.011	0.014	
12/5-9/2002	0.023	0.0095	0.0076	0.0066	<0.0050	<0.0050	<0.0050
3-Duplicate				0.0056		<0.0050	
4/2/2003	0.023	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
4-Duplicate	0.022	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
6/12/2003	0.027	0.0094	0.011	0.014	0.0063	0.0071	<0.0050
5-Duplicate	0.019	0.0083	NS	0.013	0.0069	0.0074	0.0051
9/11/2003	0.029	0.011	0.010	0.014	<0.0050	0.0087	0.0068
6-Duplicate	0.028	0.013	0.0092	0.015	0.0086	0.0098	0.0062
12/2/2003	0.0072	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
7-Duplicate	0.0068	<0.0050	<0.0050	<0.0050	0.0058	<0.0050	<0.0050
3/4/2004	0.042	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
8-Duplicate	0.042	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
2/17/2006	0.009	0.0057	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
9-Duplicate						<0.0050	
11/1/2007	0.066	<0.0050	<0.0050	0.014	<0.0050	<0.0050	<0.0050
10-Duplicate		0.0051					<0.0050
12/9/2008	0.071	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate							<0.0050
12/2/2009	0.048	0.0040	0.0012	0.0028	0.0017	0.0055	<0.0010
12-Duplicate		0.0039					
6/14-15/2010	0.080	0.0042	<0.0018	<0.0018	<0.0018	<0.0018	<0.0018
13-Duplicate	0.078						
12/1-2/2010	0.072	0.0034	0.0012	<0.0010	<0.0010	<0.0010	<0.0010
14-Duplicate		0.0036					
6/27-29/2011	0.13	0.0056	0.0038	0.0011	0.0017	<0.0010	<0.0010
15-Duplicate						<0.0010	
Average	0.025	0.009	0.010	0.012	0.008	0.011	0.006

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14	MW-14(A)
11/1/2007	<0.0050	<0.0050	0.02	<0.0050	<0.0050	<0.0050	<0.0050	
10-Duplicate	<0.0050					<0.0050		
12/9/2008	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	
11-Duplicate						<0.0050		
12/2/2009	0.12	<0.0010	<0.0010	<0.0010	0.0069	<0.0010	<0.0010	
12-Duplicate						<0.0010		
6/14-15/2010	<0.0018	0.012	<0.0018	0.0081	0.0044	<0.0018	<0.0018	
13-Duplicate						<0.0018		
12/1-2/2010	<0.0010	<0.0010	<0.0010	<0.0010	0.0043	0.0012	<0.0010	
14-Duplicate		<0.0010						
6/27-29/2011	0.0024	0.0016	0.0037	0.0032	0.014	0.0025	Abandoned	0.0014
15-Duplicate		0.0019						
Average	0.120	0.012	0.020	0.008	0.005	0.001	<0.010	<0.010

Notes:

1. All lead concentrations in mg/l.
2. Lead concentrations in bold represent positive detections above the laboratory detection limit.
3. Lead concentrations exceeding MDEQ Tier 1 Groundwater MCL for lead (0.015 mg/l) are shaded.

Table 4
pH Readings

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	3.22	3.95	3.96	4.41	5.06	5.41	6.23
12/12/2002	3.24	3.94	4.04	4.46	4.93	5.86	6.33
12/5-9/2002	3.26	3.91	3.98	4.43	5.06	5.70	6.40
4/2/2003	3.25	4.15	4.02	4.32	4.98	5.88	6.39
6/12/2003	3.10	3.75	3.83	4.08	4.70	5.90	6.09
9/11/2003	3.16	3.99	3.88	4.18	4.45	5.83	6.24
12/2/2003	3.34	3.96	4.08	4.45	4.77	5.62	6.47
3/4/2004	3.24	3.85	3.92	4.27	4.46	5.90	6.35
2/17/2006	3.27	3.86	3.75	4.74	4.63	6.21	6.20
11/1/2007	3.23	3.64	3.6	4.35	4.77	5.84	6.23
12/9/2008	3.20	3.56	3.71	4.44	4.95	5.76	6.21
12/2/2009	2.96	3.06	3.16	4.08	4.86	5.61	5.75
6/14-15/2010	2.76	3.20	3.26	4.06	4.75	5.55	5.76
12/1-2/2010	3.37	3.47	3.59	4.47	5.11	5.78	6.12
6/27-29/2011	3.46	3.81	3.99	4.69	5.25	6.20	6.43
pH Average	**3.20**	**3.74**	**3.78**	**4.36**	**4.85**	**5.80**	**6.21**

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14	MW-14(A)
11/1/2007	5.11	4.5	4.21	4.09	6.01	4.1	4.36	
12/9/2008	5.04	5.01	4.24	4.41	5.97	4.04	4.10	
12/2/2009	4.85	4.42	3.18	3.72	3.97	3.72	3.79	
6/14-15/2010	4.46	4.14	3.71	3.44	4.38	4.04	3.78	
12/1-2/2010	4.42	4.25	3.75	3.75	4.6	3.83	3.88	
6/27-29/2011	5.08	4.87	4.3	4.03	5.02	4.00	Abandoned	4.64
pH Average	**5.08**	**4.76**	**4.23**	**4.25**	**5.99**	**4.07**	**4.23**	**4.64**

Notes:

1. All pH readings are expressed in standard units.

LIST OF FIGURES

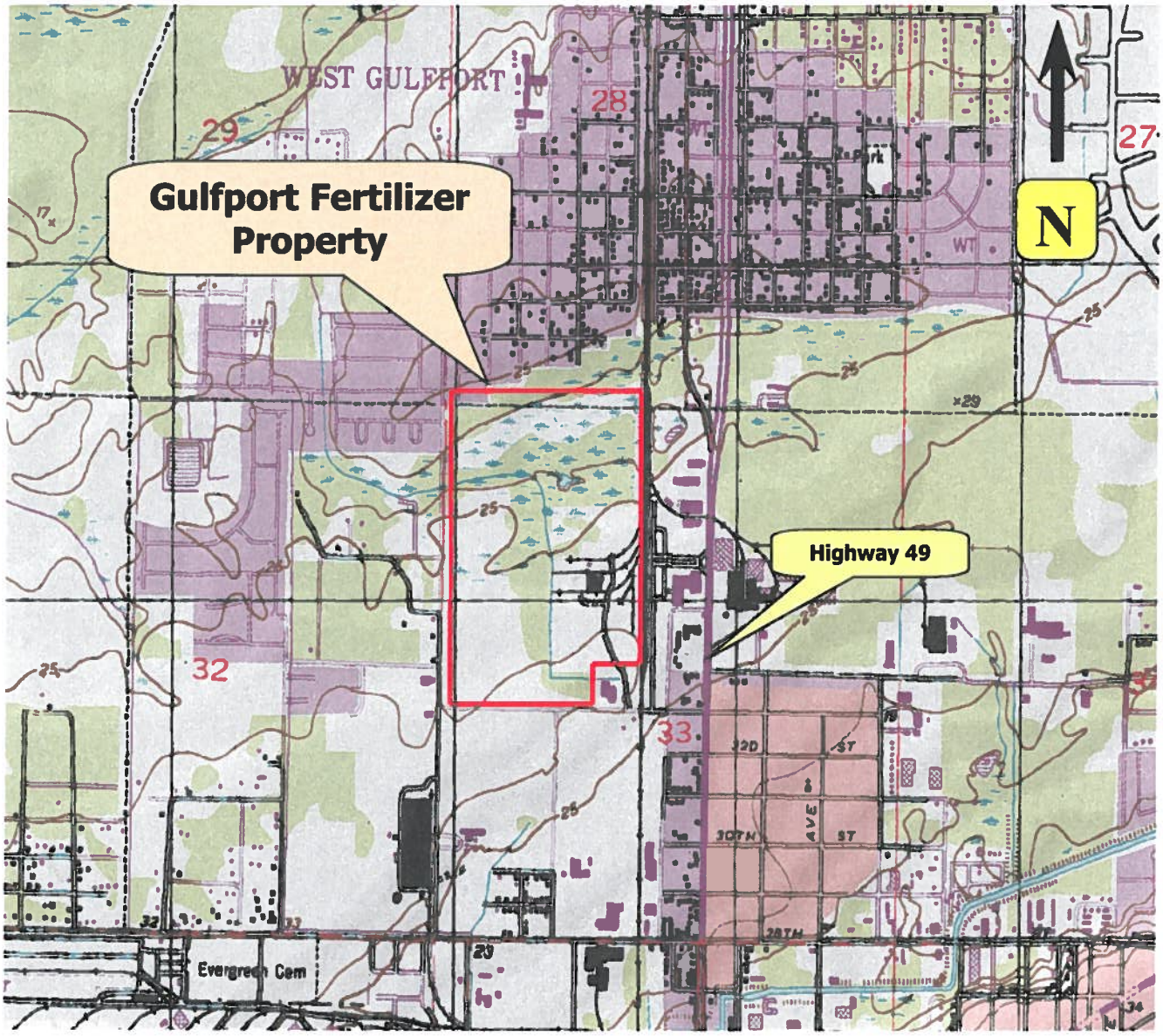
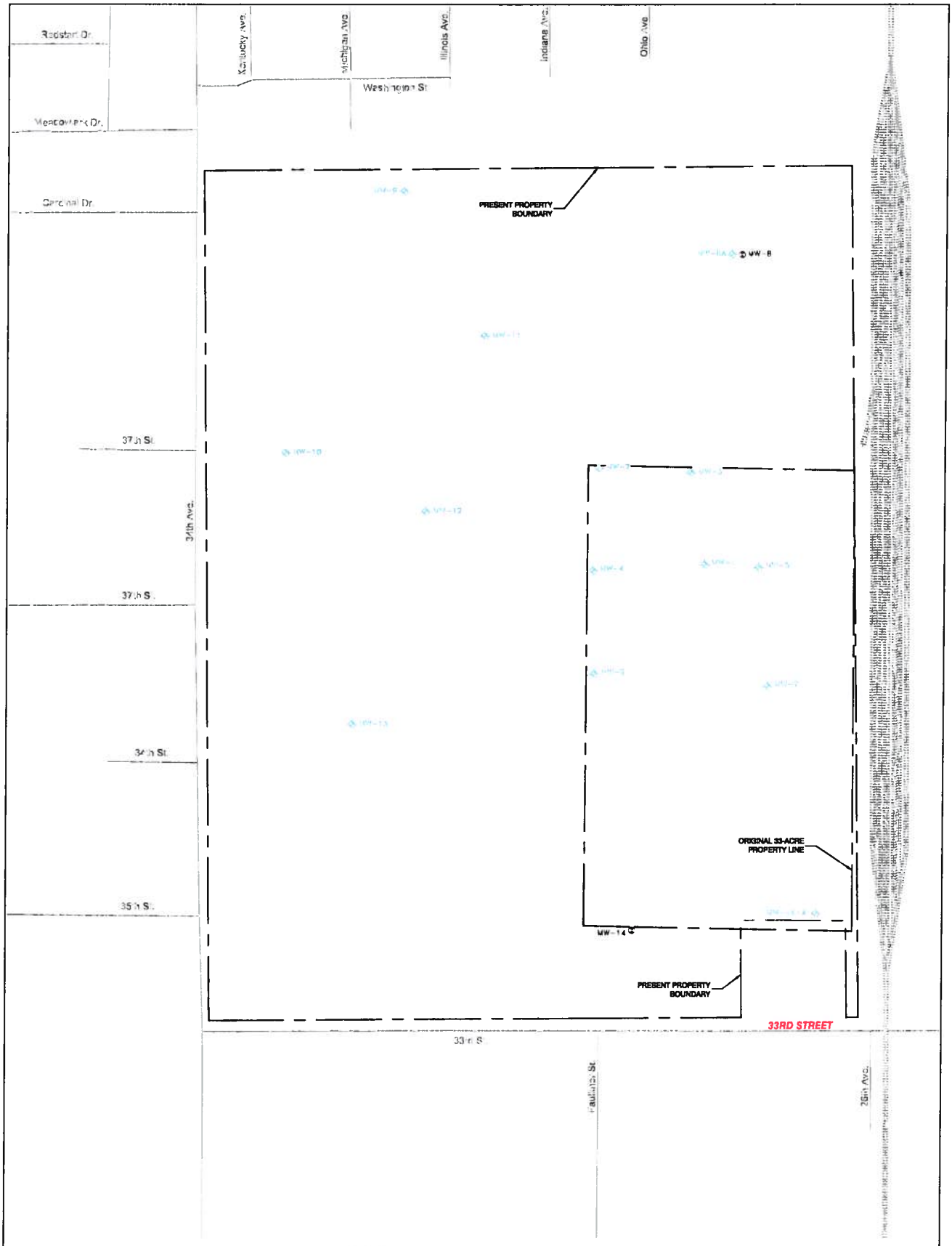


Figure 1 - Site Location Map
Gulfport Fertilizer Site
U.S.G.S. 7.5-Minute Quadrangle Map
Gulfport North, Mississippi
1994
CAC Project # 9397



LEGEND

MW-14A ◇ GROUNDWATER MONITORING WELL LOCATION

MW-14 ◇ ABANDONED GROUNDWATER MONITORING WELL LOCATION

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

Monitoring Well Location Map

DATE: 08-08-11
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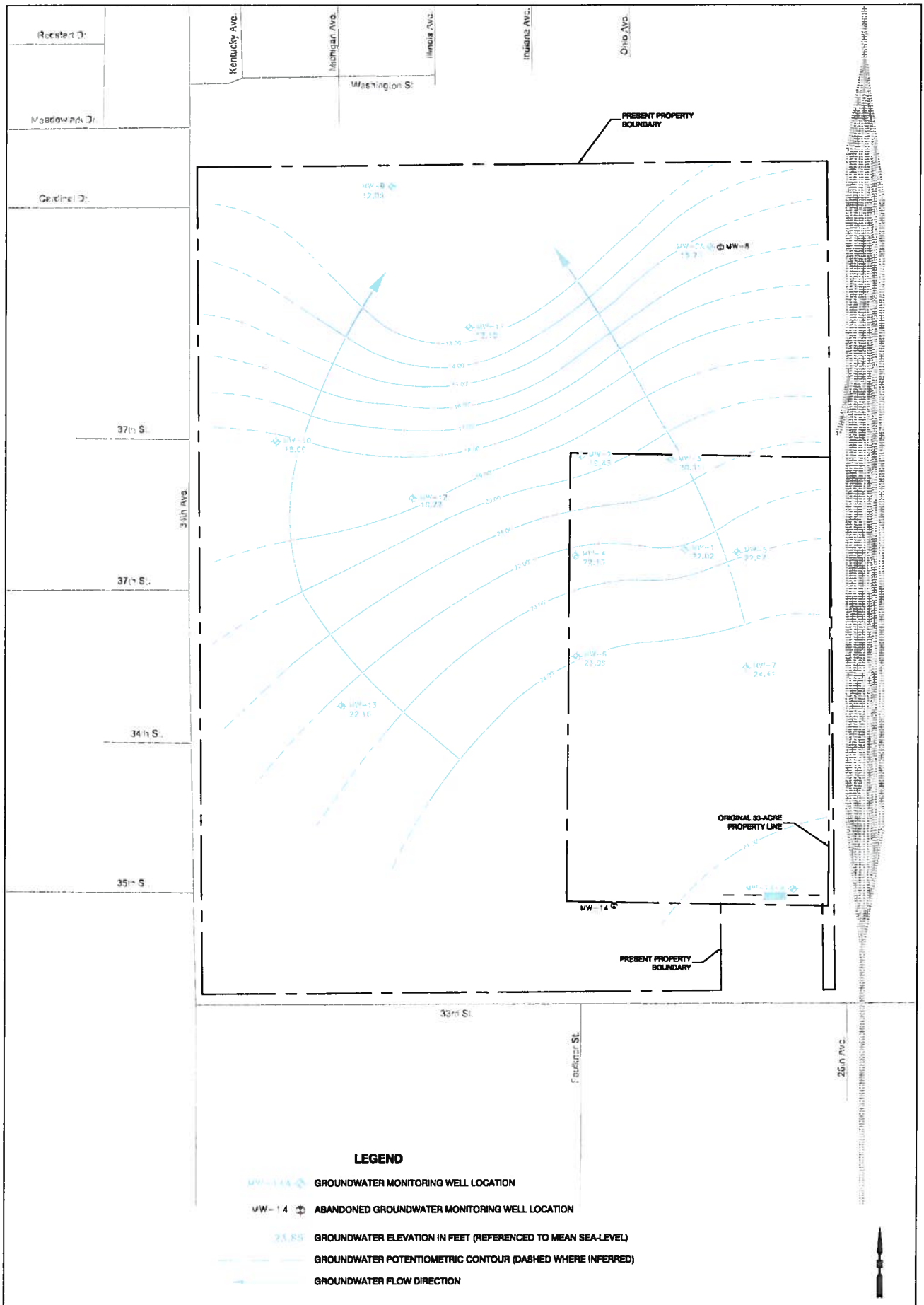
FIGURE: 2



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CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS
Potentiometric Surface Map
June 28-29, 2011

DATE: 08-09-11
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PROJECT NO: 9287
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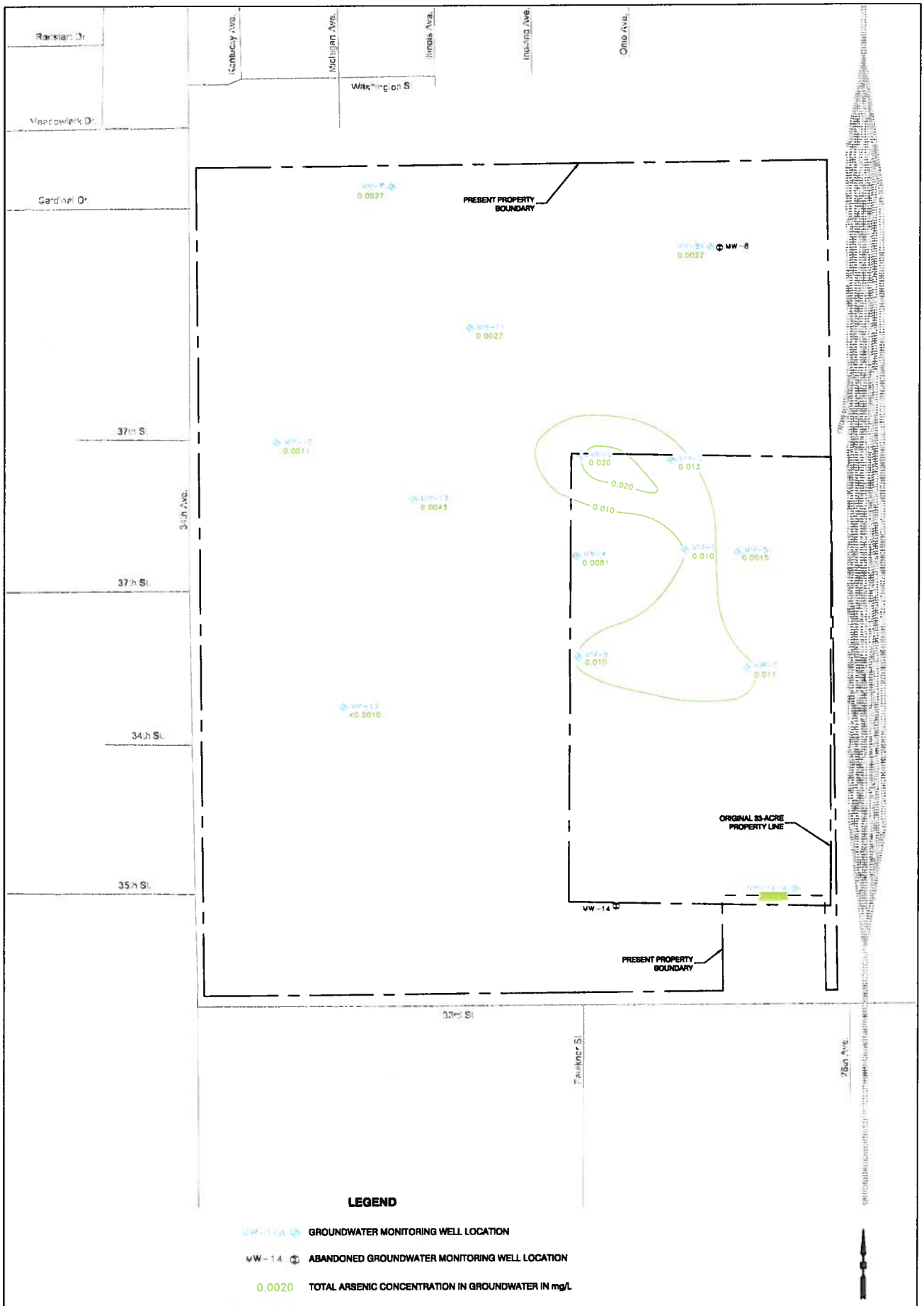
FIGURE: 3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Meadowlark Dr
Cardinal Dr
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36th Ave
37½ St
34th St
35th St
Kentucky Ave
Michigan Ave
Illinois Ave
Indiana Ave
Ohio Ave
Washington St
33rd St
Faulkner St
26th Ave
PRESENT PROPERTY BOUNDARY
ORIGINAL 33-ACRE PROPERTY LINE
PRESENT PROPERTY BOUNDARY
MW-8
MW-14
0.0027
0.0022
0.0027
0.0011
0.0043
0.020
0.013
0.020
0.010
0.0081
0.010
0.0015
0.010
0.011
<0.0010
LEGEND
GROUNDWATER MONITORING WELL LOCATION
MW-14 ABANDONED GROUNDWATER MONITORING WELL LOCATION
0.0020 TOTAL ARSENIC CONCENTRATION IN GROUNDWATER IN mg/L
ARSENIC ISO-CONCENTRATION CONTOUR
300 0 300 600 900
GRAPHIC SCALE – 1" = 300'
COVINGTON
CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax: (228) 396-0487
Former Gulfport Fertilizer Site
Gulfport, MS
Arsenic Iso-Concentration Map
June 28-29, 2011
DATE: 08-08-11
SCALE: 1" = 300'
PROJECT NO. 9397
FILE:
FIGURE: 4

LEGEND

- GROUNDWATER MONITORING WELL LOCATION
- MW-14 ABANDONED GROUNDWATER MONITORING WELL LOCATION
- 0.0014 TOTAL LEAD CONCENTRATION IN GROUNDWATER IN mg/L
- LEAD ISO-CONCENTRATION CONTOUR

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

Lead Iso-Concentration Map
June 28-29, 2011

DATE 08-09-11
SCALE 1" = 300'
PROJECT NO. 6397
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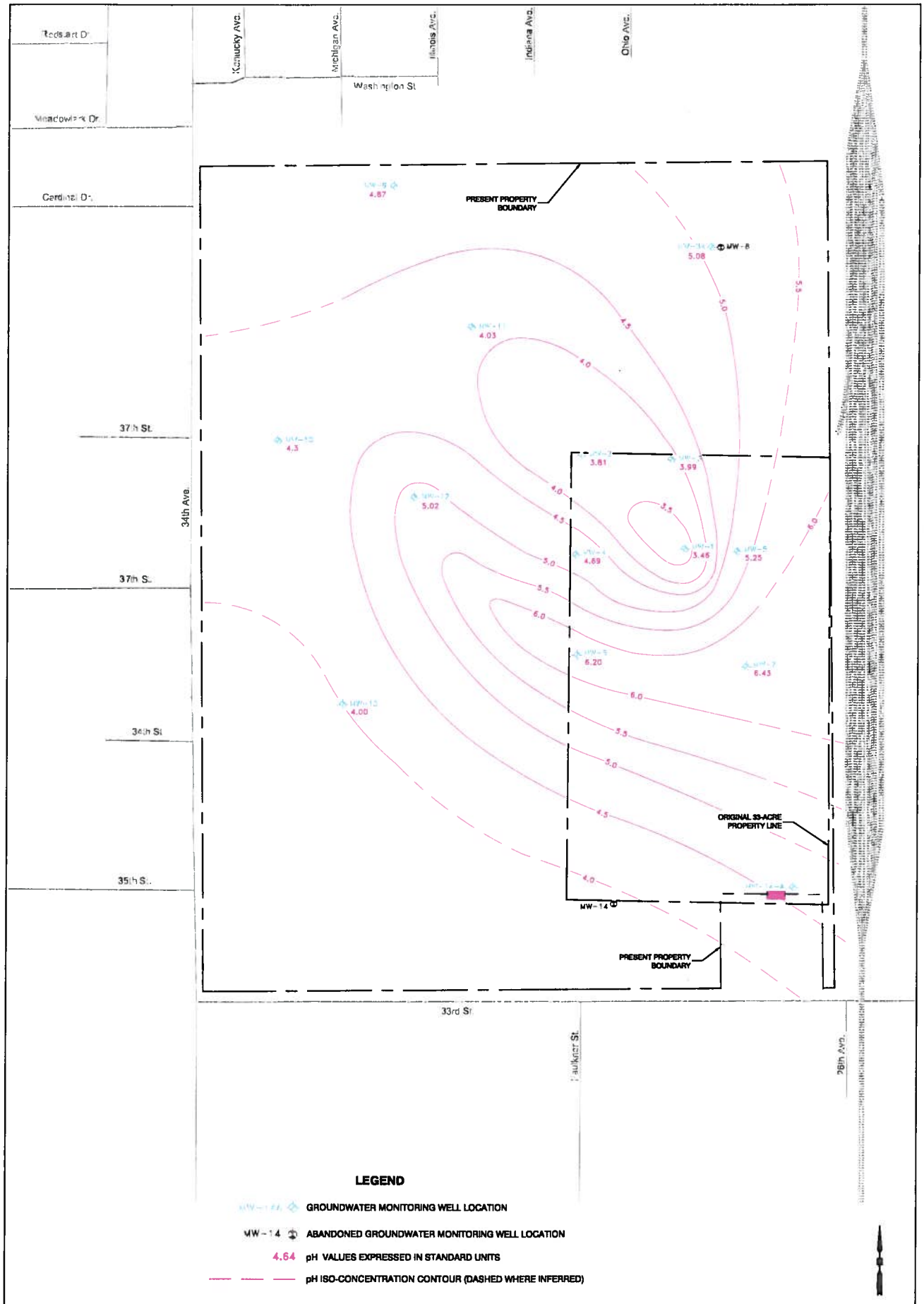
FIGURE 5



COVINGTON
CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0488 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS
pH Contour Map
June 28-29, 2011

DATE: 08-08-11
SCALE: 1" = 300'
PROJECT NO. 8367
FILE: D:\CAD\...
FIGURE: 6

APPENDIX A

Well Sampling Field Data Sheets

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/27/11	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-1	4"	32.43	29.35	27,26	17.26	10.41	22.02	5.24

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		1" Well		4" Well	
Well Multiplier:	0.023	Well Multiplier:	0.041	Well Multiplier:	0.653
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	5.24
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	3.42
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons).	10.26

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
2:08		0						
14:30	[redacted]	2.5	24.3	95	.6	3.59	416	10[redacted]
14:32	[redacted]	3.0	24.3	91	.6	3.54	404	5
14:35	[redacted]	3.5	24.3	91	.7	3.51	399	0
14:40		4.0	24.2	90	.8	3.48	392	0
14:42		4.5	24.3	90	.8	3.46	391	0
14:44		5.0	24.2	89	.8	3.46	389	0
14:46		5.5	24.2	88	.8	3.47	385	0
14:48		6.0	24.2	88	.9	3.46	386	0
14:50		6.5	24.2	88	.9	3.46	384	0
Sample: 14:51								

Signature of Field Technician:

NOTE - MW-1 Casing modified (extend up) in Oct 2007. TOC elevation noted on this data sheet reflects "newly" surveyed modification.

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date:	CAC Project No. 9397	City:	Gulfport
Sampler:	CAC Project Description: Gulfport Fertilizer Site	State:	MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-2	2"	28.75	25.89	20.95	10.95	9.29	19.46	8.51

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	8.51	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.39	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	4.2	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
12:18		0						
12:24		0.5	23.9	22	0.9	3.91	238	19
12:28		1.0	23.8	23	0.5	3.97	239	18
12:32		1.5	24.0	23	0.4	3.83	247	4
12:34		2.0	24.0	23	0.3	3.80	246	2
12:38		2.5	23.9	24	0.3	3.79	240	3
12:42		3.0	23.7	25	0.3	3.74	237	3
12:48		3.5	23.5	26	0.3	3.80	233	4
12:52		4.0	23.3	26	0.2	3.81	231	3
Collected Sample @ -> 12:53								

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date:	**CAC Project No.** 9397	**City:**	Gulfport
Sampler:	**CAC Project Description:** Gulfport Fertilizer Site	**State:**	MS

Field Equipment

pH Meter No.	**Serial No.**
Conductivity Meter No.	**Serial No.**
Turbidity Meter No.	**Serial No.**

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-3	2"	30.26	27.46	21.32	11.32	9.65	20.61	9.29

Well Casing Construction:

Calibration for Well Volume
(Water Column, In Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	1.51	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	4.54	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
15:46	9							
15:53		1.5	24.2	29	.4	4.01	301	24
15:55		2.0	24.6	29	.5	3.97	301	18
15:57		2.5	24.3	29	.4	4.00	295	0
16:00		3.0	24.2	29	.4	4.00	293	0
16:03		3.5	24.1	30	.4	4.00	290	0
16:05		4.0	24.1	30	.3	4.00	288	0
16:07		4.5	23.9	30	.3	3.99	286	0
16:10	Samples Collected							

Signature of Field Technician: RH/LC

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/28/11	CAC Project No. 9397	City: Gulfport
Sampler: LH / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-4	2"	28.28	25.93	20.40	10.40	6.15	22.13	11.73

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.73	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.9	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.7	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
13:02	—	0						
13:05		0.5	22.2	57	0.5	4.41	31	5
13:08		1.0	22	57	0.5	4.55	50	9
13:11		1.5	21.9	57	0.5	4.58	65	7
13:14		2.0	21.9	57	0.6	4.64	76	6
13:17		2.5	21.9	57	0.7	4.64	78	3
13:20		3.0	22.0	57	0.9	4.66	93	11
13:23		3.5	22.1	57	1.2	4.69	85	5
13:26		4.0	22.1	58	1.3	4.69	86	7
13:29		4.5	22.0	58	1.3	4.69	85	4
13:32		5.0	22.0	58	1.3	4.69	84	3
Sample @ 13:33								

Signature of Field Technician: [signature]

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/29/11	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-5	2"	32.10	29.25	23.19	13.19	9.35	22.77	9.58

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.56	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	4.68	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
1:35								
1:45	10	2.0	23.8	38	0.3	5.08	209	6
1:47	12	2.5	23.9	45	0.4	5.12	205	1
1:50	15	3.0	23.9	99	0.4	5.16	201	1
1:53	18	3.5	23.9	99	0.4	5.21	199	1
1:55	20	4.0	24.1	38	0.5	5.23	198	0
1:57	22	4.5	24.1	39	0.5	5.24	197	0
1:59	24	5.0	24.1	40	0.5	5.25	196	0
2:00	Sample							

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/22/11	CAC Project No. 9397	City: Gulfport	
Sampler: LL / RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-6	2"	34.29	31.23	25.34	15.34	10.3	[redacted]	8.56

Well Casing Construction: 23.91 [redacted]

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	8.56 1.41	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	4.22	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
14:56								
15:00		1	22.9	75	.7	6.29	48	41
15:02		2.0	23.1	74	.5	6.28	30	44
15:07		2.5	23.2	73	.5	6.26	20	8
15:08		3.0	23.2	96	.6	6.23	78	2
15:13		3.5	23.1	93	.6	6.21	103	2
15:15		4.0	23.1	77	.5	6.20	115	1
15:17		4.5	23.1	73	.5	6.20	124	2
15:20	Sample + also collected dup sample 1							

Signature of Field Technician: [signature]

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/27/11	CAC Project No. 9397	City: Gulfport	
Sampler: RH / LL	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-7	2"	33.48	30.75	24.54	14.54	9.07	24.41	9.87

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	9.87	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.6	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	4.8	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
12:47	0							
12:53	~~0~~ 6	1.0	23.5	63	0.7	6.48	63	110
12:56	9	1.5	23.8	67	0.5	6.44	67	41
12:59	11	2.0	23.6	74	0.5	6.43	65	47
1:03	15	2.5	23.6	60	0.4	6.42	59	74
1:05	17	3.0	23.5	58	0.4	6.42	55	37
1:07	19	3.5	23.4	56	0.4	6.42	50	25
1:09	21	4.0	23.4	55	0.4	6.41	45	37
1:13	23	4.5	23.3	54	0.4	6.41	42	47
1:15	26	4.8	23.4	54	0.4	6.43	41	43
Collected Sample 13:13			Sample collected					

Signature of Field Technician: L. Lam / MDEQ MW-7 @ 13:13

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/28/11	CAC Project No. 9397	City: Gulfport	
Sampler: LL/RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-8 (A)	2"	22.54		15.20	5.20	7.31	15.23	10.23

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	10.07	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.63	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	4.9	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
7:48		0						
7:54	6	1	21.1	16	.5	5.22	196	500
7:56		1.5	21.3	16	.5	5.13	201	85
7:58		2.0	21.4	16	.4	5.11	195	N/A
8:01		2.5	21.3	16	.4	5.10	191	N/A
8:03		3.0	21.2	16	.4	5.09	189	N/A
8:05		3.5	21.2	16	.4	5.09	185	96
8:07		4.0	21.3	16	.4	5.08	187	81
8:09		4.5	21.2	16	.4	5.09	187	67
Samples Collected @			8:10					

Signature of Field Technician: LL/RH

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/28/11	CAC Project No. 9397	City: Gulfport	
Sampler: RH/LL	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-9	2"	22.64		16.13	6.13	10.54	17.05	5.92

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	5.92	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	0.9	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	2.8	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
8:20		0						
8:24		0.5	23.1	.13	4.0	5.04	66	130
8:30		1.0	22.7	.13	1.0	4.68	100	27
8:33		1.5	22.7	.13	0.8	4.65	107	12
8:36		2.0	22.7	.14	0.6	4.64	127	9
8:39		2.5	22.5	.13	0.5	4.82	133	14
8:41		3.0	22.5	.13	0.6	4.82	136	11
collected Sample @			8:41					
collected ~~Sample~~ DUP-2								

Signature of Field Technician: [signature]

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/29/11	CAC Project No. 9397	City: Gulfport	
Sampler: RH/LL	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-10	2"	27.69		19.73	9.73	9.6	18.09	8.36

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	8.36	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.36	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	4.1	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
10:06		0						
10:10		0.5	24.6	B	1.5	4.32	247	160
10:13		1.0	24.3	B	1.3	4.29	259	70
10:16		1.5	24.1	B	0.9	4.30	262	25
10:20		2.0	23.9	B	0.6	4.30	264	12
10:23		2.5	23.9	B	0.6	4.26	266	9
10:26		3.0	23.8	B	0.6	4.30	262	5
10:29		3.5	23.8	B	0.5	4.30	270	3
10:31		4.0	24.0	B	0.5	4.30	272	2
10:35	—	Collected Samples						

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/28/11	CAC Project No. 9397	City: Gulfport	
Sampler: RH/LL	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-11	2"	22.85		15.05	5.05	10.75	11.83	6.78

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	6.78	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.11	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	3.3	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
8:54		0		99				
8:57		0.5	21.7	98	1.2	3.36	377	4
9:00		1.0	21.6	98	0.6	3.64	156	2
9:03		1.5	21.5	97	0.5	3.97	108	2
9:07		2.0	21.4	96	0.4	3.89	15	3
9:10		2.5	21.4	97	0.4	3.99	14	3
9:13		3.0	21.3	97	0.4	4.05	42	2
9:15	→	Collected Samples						

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/28/14	CAC Project No. 9397	City: Gulfport	
Sampler: RH/JL	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-12	2"	28.92		20.95	10.95	10.20	18.72	7.73

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	1.25	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	3.77	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
9:25		0						
9:27		0.5	23.4	16	.4	4.95	24	N/A
9:29		1.0	23.3	16	.4	5.00	43	N/A
9:31		1.5	23.4	16	.4	5.04	62	N/A
9:33		2.0	23.4	16	.4	5.03	70	N/A
9:35		2.5	23.2	16	.4	5.03	75	N/A
9:37		3.0	23.2	16	.3	5.02	83	N/A
9:39		3.5	23.5	16	.3	5.02	85	N/A
Collected Sample @ 9:45								

Signature of Field Technician: JL / RH

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/29/11	CAC Project No. 9397	City: Gulfport	
Sampler: RWLL	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-13	2"	32.36		24.30	14.30	10.2	22.16	7.86

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	7.86	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.3	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	3.9	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
940	—	0						
944		0.5	23.7	7	0.5	4.24	207	25
948		1.0	23.9	7	0.4	4.16	216	15
952		1.5	24.0	7	0.3	4.12	220	6
956		2.0	24.0	7	0.3	4.12	230	6
1007		2.5	24.0	7	0.3	4.09	235	3
1004		3.0	24.0	7	0.3	4.04	239	2
1008		3.5	24.0	7	0.3	4.01	243	1
1012		4.0	24.0	7	0.3	4.00	244	1
Collected Sample @ 913								

Signature of Field Technician:

Replacement well for MW-14 (Now Abandoned)

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 6/29/11	CAC Project No. 9397		City: Gulfport
Sampler: RH/LL	CAC Project Description: Gulfport Fertilizer Site		State: MS

Field Equipment

pH Meter No.	Used old Data sheet from MW-14; until new Tocdev. is surveyed & recorded	Serial No.	
Conductivity Meter No.		Serial No.	
Turbidity Meter No.		Serial No.	

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-14 (A)	2"	34.08 Assumed		25.83 Assumed	15.83 Assumed	9.23	24.85	9.02

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	0.02	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.5	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	4.5	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
930	—	0						
934		0.5	24.6°	11	0.5	4.78	200	50
938		1.0	24.4°	11	0.4	4.68	200	30
942		1.5	24.2°	11	0.3	4.64	199	40
946		2.0	24.2°	11	0.3	4.63	201	33
950		2.5	24.1°	11	0.3	4.63	200	17
954		3.0	24.2°	11	0.3	4.62	200	16
958		3.5	24.3°	11	0.4	4.63	200	18
1002		4.0	24.2°	11	0.3	4.63	199	17
1006		4.5	24.1	11	0.3	4.64	199	9
Collected Sample →		1008						

Signature of Field Technician: R. Hudle / R Hudle

APPENDIX B

Laboratory Analytical Report Sheets and

Chain-Of-Custody Forms

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Est. 1970

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

Report Summary

Sunday July 10, 2011

Report Number: L523848
Samples Received: 06/30/11
Client Project: 9397.00

Description: Gulfport Fertillzer

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Craig Cothron , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - I-2327, CT - PH-0197, FL - E87487
GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704, ND - R-140
NJ - TN002,NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032008A,
TX - T104704245, OK-9915

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.
Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-01

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-7

Collected By : L. Larson
Collection Date : 06/27/11 13:13

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.011	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	BDL	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-02

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-5

Collected By : L. Larson
Collection Date : 06/27/11 14:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0015	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.0017	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-03

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-1

Collected By : L. Larson
Collection Date : 06/27/11 14:51

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.010	0.0010	mg/l	6020	07/01/11	1
Arsenic, Dissolved	BDL	0.0010	mg/l	6020	07/08/11	1
Lead	0.13	0.0010	mg/l	6020	07/01/11	1
Lead, Dissolved	0.17	0.0010	mg/l	6020	07/08/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit (PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-04

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-6

Collected By : L. Larson
Collection Date : 06/27/11 15:20

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.010	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	0.0092	0.0010	mg/l	6020	07/05/11	1
Lead	BDL	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-05

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-3

Collected By : L. Larson
Collection Date : 06/27/11 16:10

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.013	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	0.0030	0.0010	mg/l	6020	07/05/11	1
Lead	0.0038	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	0.024	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-06

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Site ID :

Sample ID : DUP-1

Project # : 9397.00

Collected By :
Collection Date : 06/27/11 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.011	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	0.0091	0.0010	mg/l	6020	07/05/11	1
Lead	BDL	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-07

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : DUP-2

Collected By : L. Larson
Collection Date : 06/28/11 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0027	0.0010	mg/l	6020	07/01/11	1
Arsenic, Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.0019	0.0010	mg/l	6020	07/01/11	1
Lead, Dissolved	0.030	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit (PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-08

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-8A

Collected By : L. Larson
Collection Date : 06/28/11 08:10

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0022	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.0024	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	0.016	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

Date Received : June 30, 2011
Description : Gulfport Fertillzer

ESC Sample # : L523848-09

Site ID :

Sample ID : MW-9

Project # : 9397.00

Collected By :
Collection Date : 06/28/11 08:41

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0027	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.0016	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	0.036	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-13

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-2

Collected By : L. Larson
Collection Date : 06/28/11 12:53

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.020	0.0010	mg/l	6020	07/04/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.0056	0.0010	mg/l	6020	07/04/11	1
Lead,Dissolved	0.058	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-14

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-4

Collected By : L. Larson
Collection Date : 06/28/11 13:33

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0081	0.0010	mg/l	6020	07/04/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/08/11	1
Lead	0.0011	0.0010	mg/l	6020	07/04/11	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	07/08/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-15

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-13

Collected By :
Collection Date : 06/29/11 09:13

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	07/04/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.0025	0.0010	mg/l	6020	07/04/11	1
Lead,Dissolved	0.011	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-16

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-14A

Collected By : L. Larson
Collection Date : 06/29/11 10:08

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0020	0.0010	mg/l	6020	07/04/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.0014	0.0010	mg/l	6020	07/04/11	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit (PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:43

ESC
LAB SCIENCES
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12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-17

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : EQUIP BLANK

Collected By : L. Larson
Collection Date : 06/29/11 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	07/04/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	BDL	0.0010	mg/l	6020	07/04/11	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit (PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/10/11 11:42 Printed: 07/10/11 11:43

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-10

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-11

Collected By :
Collection Date : L. Larson
06/28/11 09:15

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0027	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.032	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	0.038	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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Fax (615) 758-5859

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-11

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-12

Collected By :
Collection Date : 06/28/11 09:45

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0043	0.0010	mg/l	6020	07/01/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.014	0.0010	mg/l	6020	07/01/11	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

July 10, 2011

ESC Sample # : L523848-12

Site ID :

Project # : 9397.00

Date Received : June 30, 2011
Description : Gulfport Fertillzer

Sample ID : MW-10

Collected By : L. Larson
Collection Date : 06/28/11 10:35

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0011	0.0010	mg/l	6020	07/04/11	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	07/05/11	1
Lead	0.0037	0.0010	mg/l	6020	07/04/11	1
Lead,Dissolved	0.020	0.0010	mg/l	6020	07/05/11	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

Attachment A
List of Analytes with QC Qualifiers

Sample Number	Work Group	Sample Type	Analyte	Run ID	Qualifier
L523848-12	WG543810	SAMP	Lead	R1750018	P1

Attachment B
Explanation of QC Qualifier Codes

Qualifier	Meaning
P1	RPD value not applicable for sample concentrations less than 5 times the reporting limit.

Qualifier Report Information

ESC utilizes sample and result qualifiers as set forth by the EPA Contract Laboratory Program and as required by most certifying bodies including NELAC. In addition to the EPA qualifiers adopted by ESC, we have implemented ESC qualifiers to provide more information pertaining to our analytical results. Each qualifier is designated in the qualifier explanation as either EPA or ESC. Data qualifiers are intended to provide the ESC client with more detailed information concerning the potential bias of reported data. Because of the wide range of constituents and variety of matrices incorporated by most EPA methods,it is common for some compounds to fall outside of established ranges. These exceptions are evaluated and all reported data is valid and useable "unless qualified as 'R' (Rejected)."

Definitions

Accuracy - The relationship of the observed value of a known sample to the true value of a known sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, surrogate recoveries, etc.

Precision - The agreement between a set of samples or between duplicate samples. Relates to how close together the results are and is represented by Relative Percent Differrence.

Surrogate - Organic compounds that are similar in chemical composition, extraction, and chromotography to analytes of interest. The surrogates are used to determine the probable response of the group of analytes that are chemically related to the surrogate compound. Surrogates are added to the sample and carried through all stages of preparation and analyses.

TIC - Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.

Summary of Remarks For Samples Printed
07/10/11 at 11:43:00

TSR Signing Reports: 034
R5 - Desired TAT

PAS added MINV 100 no notification

Sample: L523848-01 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-02 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-03 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-04 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-05 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-06 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-07 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-08 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-09 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-10 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-11 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-12 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-13 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-14 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-15 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-16 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Sample: L523848-17 Account: COVASSOC Received: 06/30/11 09:00 Due Date: 07/08/11 00:00 RPT Date: 07/10/11 11:42

Covington & Associates

2200-A 25th Avenue
Gulfport,MS 39501

Billing Information:

Mr. Lars Larson
2200-A 25th Avenue

Gulfport,MS 39501

larslarson28@GMAIL.com

Report to: **Mr. Lars Larson**

Email: lars@covington[illegible]associates.net

Project Description: **Gulfport Fertilizer**

City/State Collected

Phone: **(228) 396-0486**
FAX:

Client Project #: **9397.00**

Lab Project # **COVASSOC-GULFPORT**

Collected by (print): L. LARSON

Site/Facility ID#:

P.O.#:

Collected by (signature):

Immediately Packed on Ice N___ Y ✓

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day.....100%
___ Two Day.....50%
___ Three Day.....25%

Date Results Needed

Email? __No __Yes
FAX? __No __Yes

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDG / PBDG 500mlHDPE-NoPres	ASG / PBG 500mlHDPE-HNO3						
MW-7	GRAB	GW		6/27/11	1313	2	X	X						
MW-5		GW			1400	2	X	X						
MW-1		GW			1451	2	X	X						
MW-6		GW			1520	2	X	X						
MW-3		GW			1610	2	X	X						
MW-2		GW				2	X	X						
[illegible]		GW				2	X	X						
DUP-1		GW		6/27/11		2	X	X						
DUP-2		GW		6/28/11		2	X	X						

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

Remarks: STAT

Analysis/Container/Preservative

Chain of Custody
Page ___ of ___
C 523848

ESC LAB SCIENCES
12065 Lebanon Road
Mt. Juliet, TN 37122

Phone: (800) 767-5859
Phone: (615) 758-5858
Fax: (615) 758-5859

C180

Acctnum: COVASSOC (lab use only)
Template/Prelogin T65389/P359679
Cooler #: 6/at 1.6
Shipped Via: FedEX Ground

Remarks/Contaminant | Sample # (lab only)

*TCLP - 6010 of Cr
6020 - Needs as Lowest D.L.'s as Possible!! -05

01
06
07

pH _____ Temp _____

Flow _____ Other _____

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
[signature]	6/29/11	1130	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)
			[signature]

Samples returned via: ☐ UPS ☐ FedEx ☐ Courier ☐ ____
Temp: 3.4° Bottles Received: 34
Date: 6-30-11 Time: 09:00

Condition: OK (lab use only)
COC Seal Intact: ___ Y ___ N ___ NA
pH Checked: C2 NCF:

Covington & Associates

2200-A 25th Avenue
Gulfport,MS 39501

Billing information:

Mr. Lars Larson
2200-A 25th Avenue

Gulfport,MS 39501

larslarson28@gmail.com

Analysis/Container/Preservative

Chain of Custody
Page ___ of ___

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12065 Lebanon Road
Mt. Juliet, TN 37122

Phone: (800) 767-5859
Phone: (615) 758-5858
Fax: (615) 758-5859

L523848

Report to: **Mr. Lars Larson**

Email: lars@[redacted]es.net

Project Description: **Gulfport Fertillzer**

City/State Collected

Phone: **(228) 396-0486**
FAX:

Client Project #: **9397.00**

Lab Project # **COVASSOC-GULFPORT**

Collected by (print):

Site/Facility ID#:

P.O.#:

Collected by (signature):

Immediately Packed on Ice N ___ Y ✓

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day.....100%
___ Two Day.....50%
___ Three Day.....25%

Date Results Needed

Email? ___No ___Yes
FAX? ___No ___Yes

Acctnum: **COVASSOC** (lab use only)
Template/Prelogin #: **T65389/P359679**
Cooler #: **6/21 MG**
Shipped Via: **FedEx Ground**

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDG / PBDG 500mlHDPE-NoPres	ASG / PBG 500mlHDPE-HNO3	Remarks/Contaminant	Sample # (lab only)
MW-8(A)	GRAB	GW	—	6/29/11	810	2	X	X	FCP- USE	-08
MW-9		GW	—		941	2	X	X		-09
MW-11		GW	—		915	2	X	X	6010 or 6020 — to	-10
MW-12		GW	—		945	2	X	X	Need the lowest	-11
MW-10		GW	—		1035	2	X	X	Det. Limits Possible	-12
MW-2		GW	—		1253	2	X	X		-13
MW-4		GW	—		1333	2	X	X		-14
MW-13		GW	—	6/29/11	943	2	X	X		-15
MW-14(A)		GW	—	6/29/11	1008	2	X	X		-16
EQUIP BLANK				6/29/11	—	2	X	X		-17

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

pH _____ Temp _____

Remarks: STAT

Flow _____ Other _____

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
[signature]	6/29/11	1130	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)

Samples returned via: ☐ UPS ☑ FedEx ☐ Courier ☐ ____
Temp: 3.1°C Bottles Received: 34
Date: 6-30-11 Time: 09:20

Condition: (lab use only) OK
COC Seal Intact: ___ Y ___ N ✓ NA
pH Checked: 22 NCF:

COVINGTON CIVIL & ENVIRONMENTAL, LLC

2200-A 25TH AVENUE
GULFPORT, MS 39501

PHONE (228) 396-0486
FAX (228) 396-0487
E-MAIL LARSLARSON28@GMAIL.COM

January 5, 2011

Ms. Kayra Johnson, Project Engineer
Office of Pollution Control
Mississippi Department of Environmental Quality
Groundwater Assessment & Remediation Division
Jackson, Mississippi 39289-0385

FILE COPY

Re: Comprehensive Groundwater Monitoring Report – December 2010
Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi
CCE Project No. 9397

Dear Ms. Johnson:

On December 1 and 2, 2010, Covington Civil & Environmental, LLC (CCE) conducted the fifth (5th) comprehensive groundwater sampling event of all 14 monitoring wells at the site and the third (3rd) comprehensive sampling event per the Mississippi Department of Environmental Quality (MDEQ) approved "Compliance Monitoring Program" of February 2009. The approved Compliance Monitoring Program requires that semi-annual groundwater sampling of all wells take place for three (3) years. This particular assessment report documents the conditions of the groundwater in early December 2010, as well as changes in groundwater quality and the potentiometric fluctuations of all site monitoring wells. A USGS Topographic Quadrangle Map illustrating the location of the former Gulfport Fertilizer site is included as Figure 1.

BACKGROUND

In 2001, CCE initiated the groundwater assessment program for the former Gulfport Fertilizer site. Following the MDEQ's approval of Hancock Bank's Corrective Action Program and the beginning of the semi-annual sampling events, the only substantive change that has taken place with respect to the groundwater assessment program has been the abandonment of MW-8. In May 2010, due to repeated incidents of poor groundwater quality (i.e. very high turbidity) in the water evacuated from this well, CCE oversaw the plugging and abandonment of MW-8 and the installation of the replacement well (MW-8A) immediately adjacent to it. Post-installation well development of MW-8A produced excellent water quality with very low turbidity. The December 2010 sampling event again reported excellent field water quality conditions (low turbidity, etc.) at this well in addition to laboratory analytical data that yielded non-detectable concentrations of lead and arsenic. Again, these field parameters and lab data demonstrate that the abandonment of MW-8 and the installation of MW-8A were beneficial steps in the acquisition of consistent groundwater quality information for the overall site. A monitoring well location map is included as Figure 2.

MONITORING WELL SAMPLING

Prior to monitoring well purging and sampling, CCE measured groundwater levels in each of the 14 monitoring wells. This was conducted to calculate the elevation of the potentiometric surface and to determine the well volume of each well so that an appropriate amount of groundwater would be purged prior to sampling. These groundwater elevations are listed in Table 1.

After recording the groundwater level, dedicated sample tubing was lowered into the well and positioned at approximately the middle of the water column. The sampling pump was then activated and field parameters (temperature, conductivity, pH and field turbidity) were monitored during purging. Purging continued until three (3) consecutive readings did not vary more than 0.5^0 C (field temperature), 3% (conductivity) and 0.1 standard units (pH). Field water quality measurements and parameters were recorded on a "Well Sampling Field Data Sheet" for each monitoring well. Copies of the "Well Sampling Field Data Sheet" for each monitoring well are included in Appendix A.

Once well purging was completed, groundwater samples were collected from each monitoring well. As part of the quality control program for this site, duplicate samples were also collected. One duplicate sample was collected from the set of seven newly installed wells and one from the original set of seven wells. Each sample was labeled and placed in a cooler with ice to maintain 4^0 C. Required information was recorded on the Sample Chain-of-Custody forms, included in Appendix B. The cooler was shipped to Environmental Science Corporation, Mt. Juliet, TN for analysis. Each sample was analyzed for total and dissolved arsenic and lead. The analytical results and field groundwater pH measurements are summarized in Table 2 (arsenic analyses), Table 3 (lead analyses), and Table 4 (pH measurements). The Laboratory Analytical Report Sheets and Chain-of-Custody forms are included in Appendix B.

POTENTIOMETRIC SURFACE

December 2010 Potentiometric Surface

Figure 3 illustrates the potentiometric surface of the surficial aquifer at the Gulfport Fertilizer site during the December 2010 sampling event. Table 1 also lists the groundwater elevations for each of the monitoring wells, as well as historical averages and changes in the potentiometric head over time. As in previous sampling events, the groundwater elevation contours for the illustrated in the December 2010 Potentiometric Surface map are consistent with those depicted during previous sampling events. The potentiometric surface maps for the 2007 through 2010 sampling period all reflect a very consistent groundwater flow direction (north to northwest) and a potentiometric gradient of less than 1%. The historical average for the site is closer to 0.005

feet/foot; however, the most recent sampling event for December 2010 reflects a slightly shallower gradient of roughly 0.0038 feet/foot. This gradient is indicative of an overall decline in water levels that CCE observed between June and December 2010.

LABORATORY ANALYTICAL RESULTS

Arsenic Concentrations

Table 2 presents the historical arsenic concentrations for groundwater samples collected from all of the wells at the site. Arsenic concentrations have been compared to the MDEQ's Tier 1 Groundwater MCL of 0.010 mg/L.

The analytical data reported within Table 2 reveals that the monitoring wells which report measurable concentrations of arsenic that exceed the Tier 1 TRG level continue to be the wells within the original 33-acre portion of the property: specifically MW-1, MW-2, MW-3 and MW-6. The reported arsenic concentrations at these wells ranged from 0.015 mg/L at MW-3 and MW-6 to 0.021 mg/L at MW-1. The area around MW-1 has historically reported the highest arsenic concentrations in the groundwater. During the previous five sampling events, the seven newer wells (MW-8 through MW-14) have reported some detectable arsenic concentrations. These reported concentrations have always been below the Tier 1 TRG of 0.010 mg/L with the exception of a 0.029 mg/L concentration at MW-8 in December 2009. As previously documented, MW-8 was replaced with MW-8(A) in May 2010, and the past two sampling events have reported non-detectable arsenic concentrations (<0.010 mg/L) at this location. All other monitoring wells within the annexed portion of the overall property have also reported total arsenic concentrations below the Tier 1 TRG Level of 0.010 mg/L.

Figure 4 illustrates the arsenic iso-concentrations from the most recent sampling event. The general size and shape of the arsenic plume (i.e. the area where the groundwater arsenic concentration exceeds 0.010 mg/L), appears to be relatively consistent over the past five sampling events. That is, the "core" area of the plume remains in the central to northwestern portion of the original 33-acre site and extends somewhat to the northwest into the newly annexed property. The main component of the arsenic plume that has changed is the general reduction in size from the previous four sampling events. This is evidenced mostly by the gradual decline in arsenic concentrations at MW-2 since February 2006, as well as arsenic levels reported at MW-1 and MW-6. Although these are relatively small reductions in total arsenic, these data seem to support a gradual reduction in the overall plume size along the main axis of the groundwater flow path.

Lead Concentrations

Table 3 presents the historical lead concentrations for groundwater samples collected from all fourteen site monitoring wells. The MDEQ's Tier 1 TRG for lead of 0.015 mg/L (also a Federal MCL) has consistently been used for the comparison of lead concentrations detected in the groundwater at this site. As shown in Table 3, the only monitoring well that has continued to have total lead above the Tier 1 TRG is MW-1. The December 2010 sampling event reports a total lead concentration at MW-1 of 0.072 mg/L and a dissolved lead concentration of 0.074 mg/L. All other monitoring wells reported total lead concentrations that were less than the Tier 1 TRG.

Figure 5 illustrates the lead iso-concentration lines in the groundwater for the December 2010 sampling event. This figure clearly documents that elevated lead concentrations above the 0.015 mg/L Tier 1 TRG remain within the area of the original fertilizer site; specifically in the area closest to MW-1.

pH Levels

Table 4 records the historical pH levels that have been measured at each of the site monitoring wells. Additionally, Figure 6 illustrates the pH contours for data collected during the December 2010 sampling event.

The primary zone of depressed pH (pH < 4.0), as shown in Figure 6, continues to be reported around MW-1, MW-2 and MW-3, with MW-10 and MW-11 also reporting pH values less than 4.0 during the past three sampling events. Almost all of the pH levels recorded during the most recent sampling event document a slight increase in pH, as opposed to an overall decline that has been observed since December 2008. Most of these reported pH increases were minor; generally between one-quarter and one-half of a Standard Unit. As discussed in previous reports, the main observations that are noted during each sampling event are (1) the primary area of depressed pH continues to remain around MW-1, MW-2 and MW-3 (with the central portion of the annexed property near MW-10 and MW-11 frequently showing lower pH values), and (2) an overall consistent, and generally static pH levels throughout the entire site. Small changes (upward and downward trends) will most likely continue to occur over time as a result of fluctuations in groundwater levels. Nevertheless and as previously expressed, it does not appear that these observed pH changes that have been documented since 2002 have had any real measurable effect on the historical lead or arsenic concentrations across this site.

CONCLUSIONS

In examining the groundwater data that has been reported during the past eight years, but specifically since 2007 (when the additional eight monitoring wells were installed on the annexed property), the following observations and conclusions can be made:

- Groundwater levels recorded during the December 2010 sampling event reveal a generally lower potentiometric surface and a somewhat flatter gradient than the previous sampling event (June 2010). The wells that reflect the greatest water level declines are those located on the newly constructed CAP and those to the south and west of the original 33-acre site. Based on recorded water level measurements during the past two sampling events, the CAP has not altered the groundwater flow direction or the gradient. The overall groundwater flow direction has not changed and continues to be toward the north to northwest.

- Total arsenic concentrations consistently remain "primarily" within the confines of the original 33-acres of the former Gulfport Fertilizer site. Arsenic levels at MW-2 and MW-6 have previously caused the extension of arsenic iso-concentration lines outward into the annexed portion of the property; however gradual declines in total arsenic at these two wells seem to suggest a decrease in the overall plume mass. Continued arsenic fluctuations at MW-2 and MW-6 will most likely generate slight modifications to the overall iso-concentration configuration over time, however, the outer perimeter wells (MW-8 through MW-14) confirm that overall arsenic plume is generally immobile.

- Total lead concentrations have remained very consistent and continue to demonstrate immobility of the small lead plume. The area of elevated total lead above the MCL of 0.015 mg/L remains in the area immediately surrounding MW-1.

- Groundwater quality observations recorded during the past eight years have established the minor fluctuation of pH levels in all of the monitoring wells. These pH fluctuations appeared to be the result of potentiometric surface (water level) changes caused by seasonal rainfall variation. In spite of these pH fluctuations over time, analytical data during the past eight years does not show any apparent changes in the total lead or total arsenic concentrations in the groundwater. The pH iso-concentration map for the December 2010 sampling event illustrates a very consistent pH regime relative to the previous five comprehensive sampling events.

Based on the February 2009 approval letter of the Compliance Monitoring Program for the Gulfport Fertilizer Site, Hancock Bank has now completed three rounds of semi-annual sampling. Three additional rounds of groundwater monitoring will be required to complete the "three-year" semi-annual assessment program of "all" the site's monitoring wells. At this time, CCE anticipates that the fourth comprehensive sampling event of all monitoring wells will take place in June 2011.

If you have any questions regarding this report, please contact us.

Very truly yours,
Covington Civil & Environmental, LLC

Lars Larson, P.G.
Senior Geologist

John F. Szabo, P.E.
Managing Principal

ENCLOSURES
cc: Mr. Tony Russell, OPC - MDEQ
Mr. Delma Powell, Hancock Bank

LIST OF TABLES

Table 1
Groundwater Elevations

Historical Groundwater Sampling Events
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	23.61	20.99	21.84	23.35	23.89	25.09	25.51
12/12/2002	26.01	23.11	24.14	25.66	26.26	27.32	27.65
12/5-9/2002	26.37	23.55	24.82	26.06	26.58	27.77	28.26
4/2/2003	25.95	23.39	24.64	25.78	26.20	27.45	27.76
6/12/2003	27.15	25.58	27.00	26.16	27.48	28.35	29.12
9/11/2003	27.03	23.83	25.26	26.20	27.21	28.17	28.82
12/2/2003	25.47	22.92	23.63	25.52	25.72	26.79	26.78
3/4/2004	27.53	24.23	26.02	26.3	27.9	28.37	29.46
2/17/2006	25.86	23.65	24.68	25.78	26.03	27.28	27.19
11/1/2007	26.23	23.65	25.17	26.13	27.00	28.34	28.83
12/9/2008	24.37	21.52	22.41	24.37	24.41	25.79	25.6
12/2/2009	26.07	25.1	25.95	26.22	27.00	28.39	28.27
6/14-15/2010	25.59	23.12	24.38	25.43	26.34	27.79	28.03
12/1-2/2010	24.31	22.69	23.04	25.16	25.18	26.78	26.53
Max. Elevation	27.53	25.58	27	26.3	27.9	28.37	29.46
Min. Elevation	23.61	20.99	21.84	23.35	23.89	25.09	25.51
Head Fluctuation	3.92	4.59	5.16	2.95	4.01	3.28	3.95
POT Average	26.12	23.49	24.72	25.69	26.43	27.49	27.94

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
11/1/2007	19.21	18.45	22.39	19.25	24.22	26.56	28.88
12/9/2008	18.47	15.11	20.39	17.42	21.02	24.66	25.89
12/2/2009	19.89	19.31	22.49	19.96	24.61	27.85	29.01
6/14-15/2010	19.1	17.69	21.94	18.88	23.69	26.06	28.33
12/1-2/2010	19.62	16.79	20.78	18.88	21.80	25.36	26.41
Max. Elevation	19.21	18.45	22.39	19.25	24.22	26.56	28.88
Min. Elevation	18.47	15.11	20.39	17.42	21.02	24.66	25.89
Head Fluctuation	0.74	3.34	2.0	1.83	3.2	1.9	2.99
POT Average	19.26	17.47	21.60	18.88	23.07	26.10	27.70

Note: All groundwater elevations in feet, mean sea level (ft., msl).
Monitoring Wells 8 through 14 were installed in October 2007.
MW-8(A) was installed in May 2010 as a replacement of MW-8. Consequently, water level elevations from June 2010 and all subsequent dates are reflective of MW-8(A).

Table 2
Arsenic Concentrations

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	<0.010	0.054	0.011	0.035	<0.010	0.016	<0.010
1-Duplicate	0.018			<0.010	<0.010		
12/12/2002	<0.010	0.073	<0.010	<0.010	<0.010	0.061	<0.010
2-Duplicate		0.095	<0.010	0.039	<0.010	0.041	
12/5-9/2002	0.018	0.052	<0.010	0.048	<0.010	0.030	0.017
3-Duplicate				0.050		0.034	
4/2/2003	<0.010	0.031	<0.010	0.019	<0.010	<0.010	<0.010
4-Duplicate	<0.010	0.051	<0.010	0.016	<0.010	<0.010	0.014
6/12/2003	0.021	0.019	<0.010	0.057	<0.010	0.032	0.011
5-Duplicate	0.018	0.016	NS	0.050	<0.010	0.031	0.011
9/11/2003	0.012	0.029	<0.010	0.055	<0.010	0.028	<0.010
6-Duplicate	0.022	0.026	0.011	0.053	<0.010	0.032	0.012
12/2/2003	0.030	0.090	0.014	0.050	<0.010	0.028	0.014
7-Duplicate	0.022	0.089	<0.010	0.047	<0.010	0.024	0.012
3/4/2004	<0.010	0.100	<0.010	0.053	<0.010	0.025	<0.010
8-Duplicate	0.012	0.082	<0.010	0.042	<0.010	0.018	<0.010
2/17/2006	0.017	0.100	0.012	0.049	<0.010	0.028	0.010
9-Duplicate						0.027	
11/1/2007	0.052	0.064	0.015	0.035	0.011	0.024	0.018
10-Duplicate		0.063					0.019
12/9/2008	0.044	0.079	0.022	0.012	<0.010	0.024	0.017
11-Duplicate							0.017
12/2/2009	0.038	0.024	0.014	0.013	<0.0010	0.026	0.013
12-Duplicate		0.025					
6/14-15/2010	0.053	0.014	<0.010	0.019	<0.010	0.022	0.011
13-Duplicate	0.053						
12/1-2/2010	0.021	0.018	0.015	0.0098	<0.0010	0.015	0.0036
14-Duplicate		0.019					
Average	0.030	0.049	0.015	0.036	0.011	0.026	0.013

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
11/1/2007	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
10-Duplicate	<0.010					<0.010	
12/9/2008	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
11-Duplicate						<0.010	
12/2/2009	0.029	0.0014	0.0012	0.0018	0.0026	<0.0010	<0.0010
12-Duplicate						<0.0010	
6/14-15/2010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
13-Duplicate						<0.010	
12/1-2/2010	<0.0010	<0.0010	<0.0010	0.0013	0.0018	<0.0010	<0.0010
14-Duplicate		<0.0010					
Average	0.029	0.001	0.001	0.0016	0.0022	<0.010	<0.010

Notes:

1. All arsenic concentrations in mg/l.
2. Arsenic concentrations in bold represent positive detections above the laboratory detection limit.
3. Arsenic concentrations exceeding MDEQ Tier 1 Groundwater MCL for arsenic (0.010 mg/l) are shaded.

Table 3
Lead Concentrations

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	0.020	0.0074	0.0087	0.016	<0.0050	<0.0050	<0.0050
1-Duplicate	0.015			0.014	<0.0050		
12/12/2002	0.014	<0.0050	<0.0050	0.0053	0.012	0.017	0.0062
2-Duplicate		0.011	0.011	0.016	0.011	0.014	
12/5-9/2002	0.023	0.0095	0.0076	0.0066	<0.0050	<0.0050	<0.0050
3-Duplicate				0.0056		<0.0050	
4/2/2003	0.023	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
4-Duplicate	0.022	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
6/12/2003	0.027	0.0094	0.011	0.014	0.0063	0.0071	<0.0050
5-Duplicate	0.019	0.0083	NS	0.013	0.0069	0.0074	0.0051
9/11/2003	0.029	0.011	0.010	0.014	<0.0050	0.0087	0.0068
6-Duplicate	0.028	0.013	0.0092	0.015	0.0086	0.0098	0.0062
12/2/2003	0.0072	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
7-Duplicate	0.0068	<0.0050	<0.0050	<0.0050	0.0058	<0.0050	<0.0050
3/4/2004	0.042	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
8-Duplicate	0.042	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
2/17/2006	0.009	0.0057	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
9-Duplicate						<0.0050	
11/1/2007	0.066	<0.0050	<0.0050	0.014	<0.0050	<0.0050	<0.0050
10-Duplicate		0.0051					<0.0050
12/9/2008	0.071	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate							<0.0050
12/2/2009	0.048	0.0040	0.0012	0.0028	0.0017	0.0055	<0.0010
12-Duplicate		0.0039					
6/14-15/2010	0.080	0.0042	<0.0018	<0.0018	<0.0018	<0.0018	<0.0018
13-Duplicate	0.078						
12/1-2/2010	0.072	0.0034	0.0012	<0.0010	<0.0010	<0.0010	<0.0010
14-Duplicate		0.0036					
Average	0.025	0.009	0.010	0.012	0.008	0.011	0.006

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
11/1/2007	<0.0050	<0.0050	0.02	<0.0050	<0.0050	<0.0050	<0.0050
10-Duplicate	<0.0050					<0.0050	
12/9/2008	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate						<0.0050	
12/2/2009	0.12	<0.0010	<0.0010	<0.0010	0.0069	<0.0010	<0.0010
12-Duplicate						<0.0010	
6/14-15/2010	<0.0018	0.012	<0.0018	0.0081	0.0044	<0.0018	<0.0018
13-Duplicate						<0.0018	
12/1-2/2010	<0.0010	<0.0010	<0.0010	<0.0010	0.0043	0.0012	<0.0010
14-Duplicate		<0.0010					
Average	0.120	0.012	0.020	0.008	0.005	0.001	<0.010

Notes:

1. All lead concentrations in mg/l.
2. Lead concentrations in bold represent positive detections above the laboratory detection limit.
3. Lead concentrations exceeding MDEQ Tier 1 Groundwater MCL for lead (0.015 mg/l) are shaded.

Table 4
pH Readings

Groundwater Investigation
Former Gulfport Fertilizer Site
Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
6/19/2002	3.22	3.95	3.96	4.41	5.06	5.41	6.23
12/12/2002	3.24	3.94	4.04	4.46	4.93	5.86	6.33
12/5-9/2002	3.26	3.91	3.98	4.43	5.06	5.70	6.40
4/2/2003	3.25	4.15	4.02	4.32	4.98	5.88	6.39
6/12/2003	3.10	3.75	3.83	4.08	4.70	5.90	6.09
9/11/2003	3.16	3.99	3.88	4.18	4.45	5.83	6.24
12/2/2003	3.34	3.96	4.08	4.45	4.77	5.62	6.47
3/4/2004	3.24	3.85	3.92	4.27	4.46	5.90	6.35
2/17/2006	3.27	3.86	3.75	4.74	4.63	6.21	6.20
11/1/2007	3.23	3.64	3.6	4.35	4.77	5.84	6.23
12/9/2008	3.20	3.56	3.71	4.44	4.95	5.76	6.21
12/2/2009	2.96	3.06	3.16	4.08	4.86	5.61	5.75
6/14-15/2010	2.76	3.20	3.26	4.06	4.75	5.55	5.76
12/1-2/2010	3.37	3.47	3.59	4.47	5.11	5.78	6.12
pH Average	**3.19**	**3.74**	**3.77**	**4.34**	**4.82**	**5.78**	**6.20**

Sampling Date	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
11/1/2007	5.11	4.5	4.21	4.09	6.01	4.1	4.36
12/9/2008	5.04	5.01	4.24	4.41	5.97	4.04	4.10
12/2/2009	4.85	4.42	3.18	3.72	3.97	3.72	3.79
6/14-15/2010	4.46	4.14	3.71	3.44	4.38	4.04	3.78
12/1-2/2010	4.42	4.25	3.75	3.75	4.6	3.83	3.88
pH Average	**5.08**	**4.76**	**4.23**	**4.25**	**5.99**	**4.07**	**4.23**

Notes:

1. All pH readings are expressed in standard units.

LIST OF FIGURES

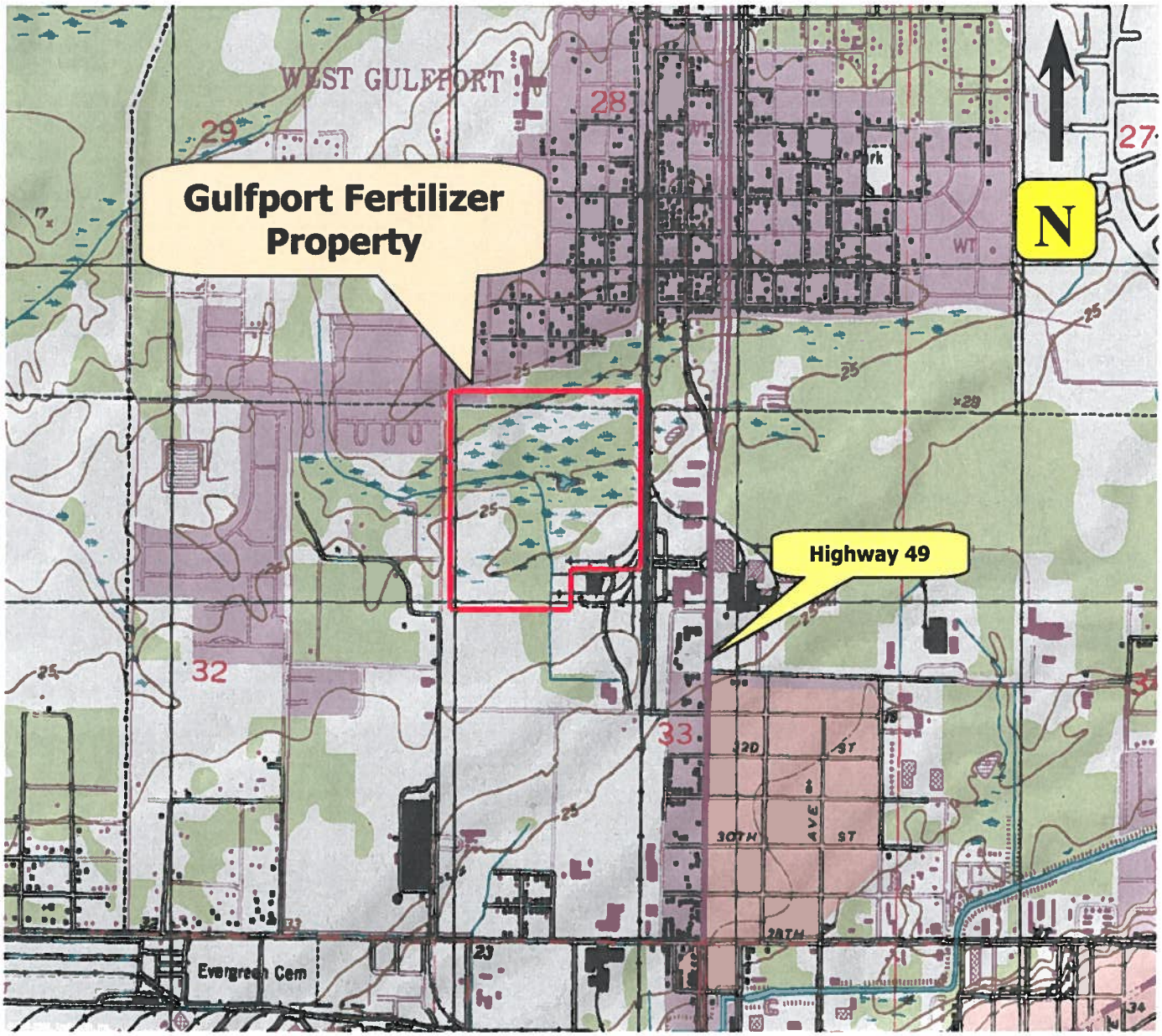


Figure 1 - Site Location Map
Gulfport Fertilizer Site
U.S.G.S. 7.5-Minute Quadrangle Map
Gulfport North, Mississippi
1994
CAC Project # 9397

LEGEND

MW-8A GROUNDWATER MONITORING WELL LOCATION

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

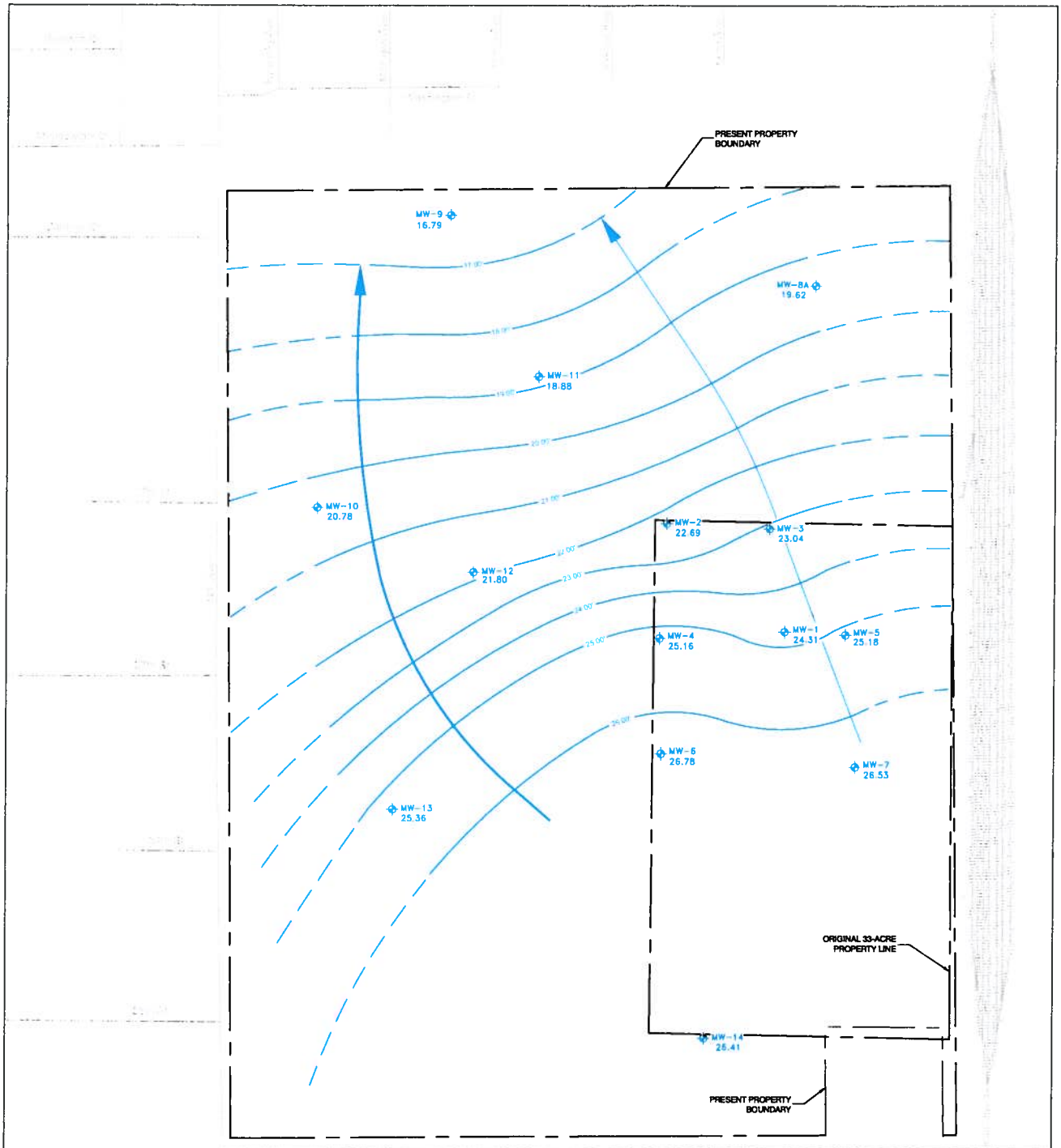
COVINGTON
CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

Monitoring Well Location Map

DATE: 01.04.11
SCALE: 1" = 300'
PROJECT NO: 6397
FILE: C:\CAD\...\GULFPORT FERTILIZER\POULTRY_OUTFOOTER\ENV 04-10

FIGURE 2



LEGEND

MW-8A — GROUNDWATER MONITORING WELL LOCATION

19.62 — GROUNDWATER ELEVATION IN FEET (REFERENCED TO MEAN SEA LEVEL)

— — — GROUNDWATER POTENTIOMETRIC CONTOUR (DASHED WHERE INFERRED)

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS
Potentiometric Surface Map
December 1-2, 2010

DATE: 01-04-11
SCALE: 1" = 300'
PROJECT NO. 6397
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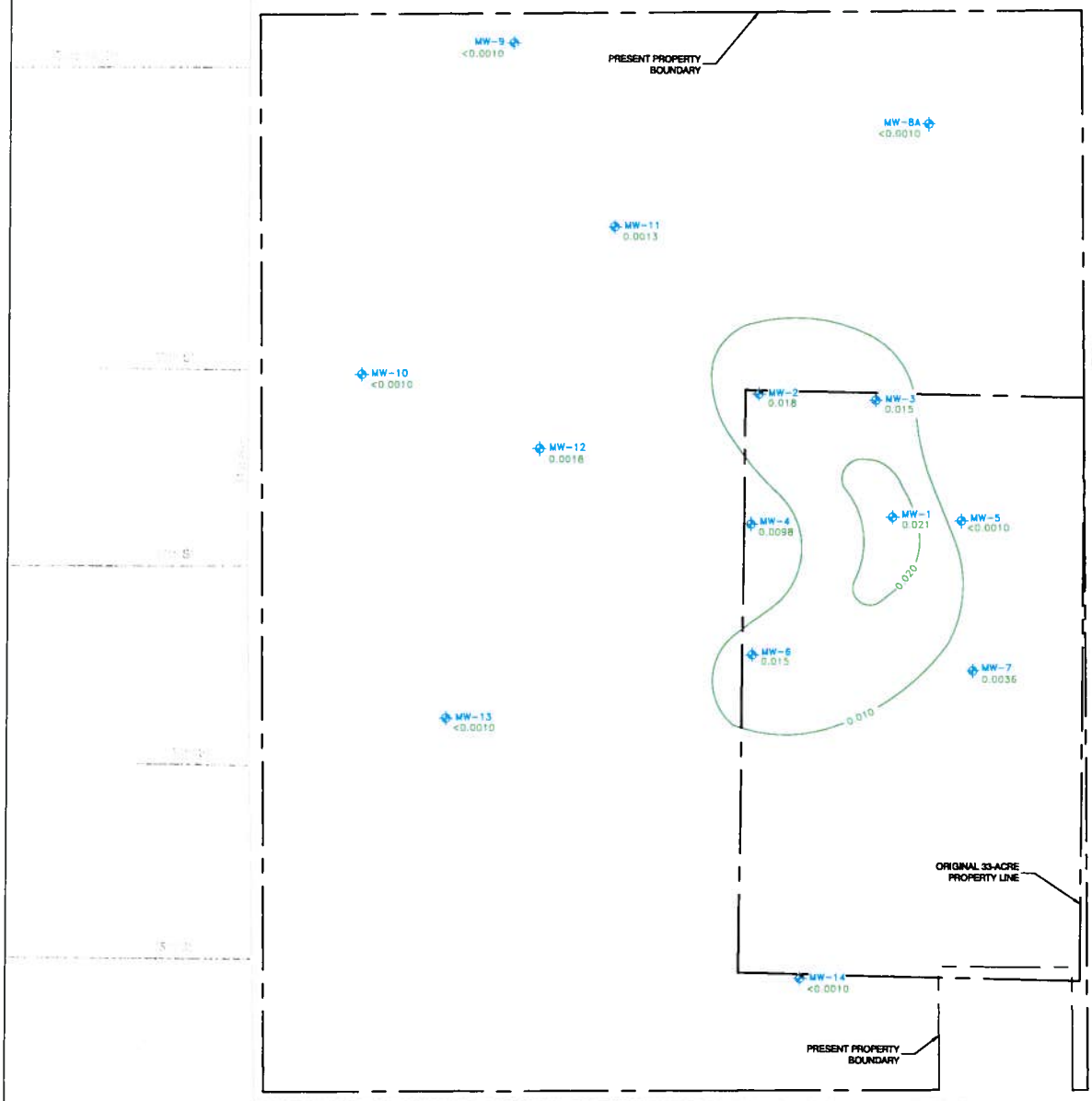
FIGURE: 3



LEGEND

MW-8A GROUNDWATER MONITORING WELL LOCATION

<0.0010 TOTAL ARSENIC CONCENTRATION IN GROUNDWATER IN mg/L

ARSENIC ISO-CONCENTRATION CONTOUR

300 0 300 600 900

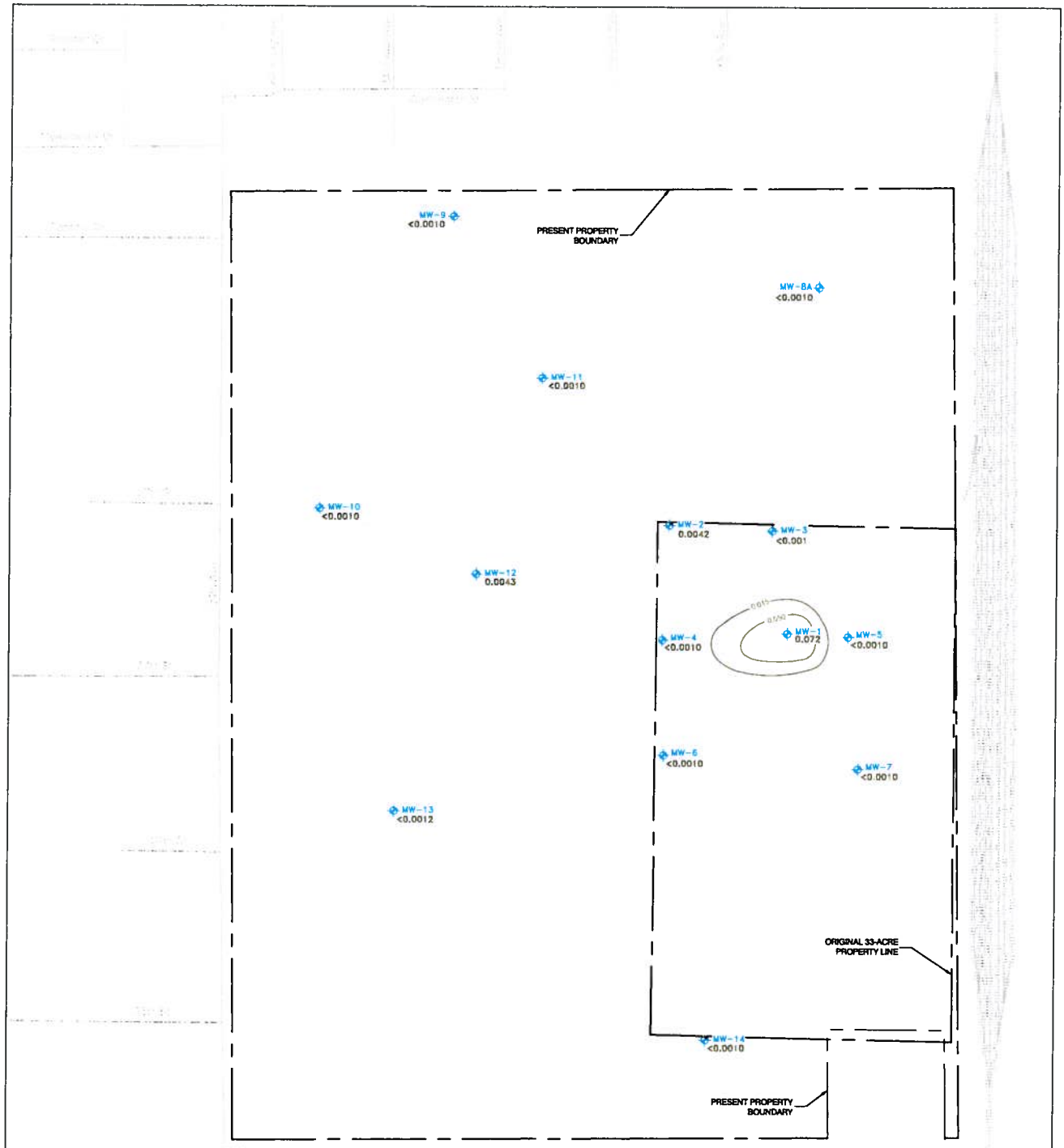
GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS

Arsenic Iso-Concentration Map
December 1-2, 2010

DATE: 01-04-10
SCALE: 1" = 300'
PROJECT NO. 9397
FILE: C:\CAD\...
FIGURE: 4



LEGEND

MW-8A — GROUNDWATER MONITORING WELL LOCATION

<0.001 — TOTAL LEAD CONCENTRATION IN GROUNDWATER IN mg/L

LEAD ISO-CONCENTRATION CONTOUR

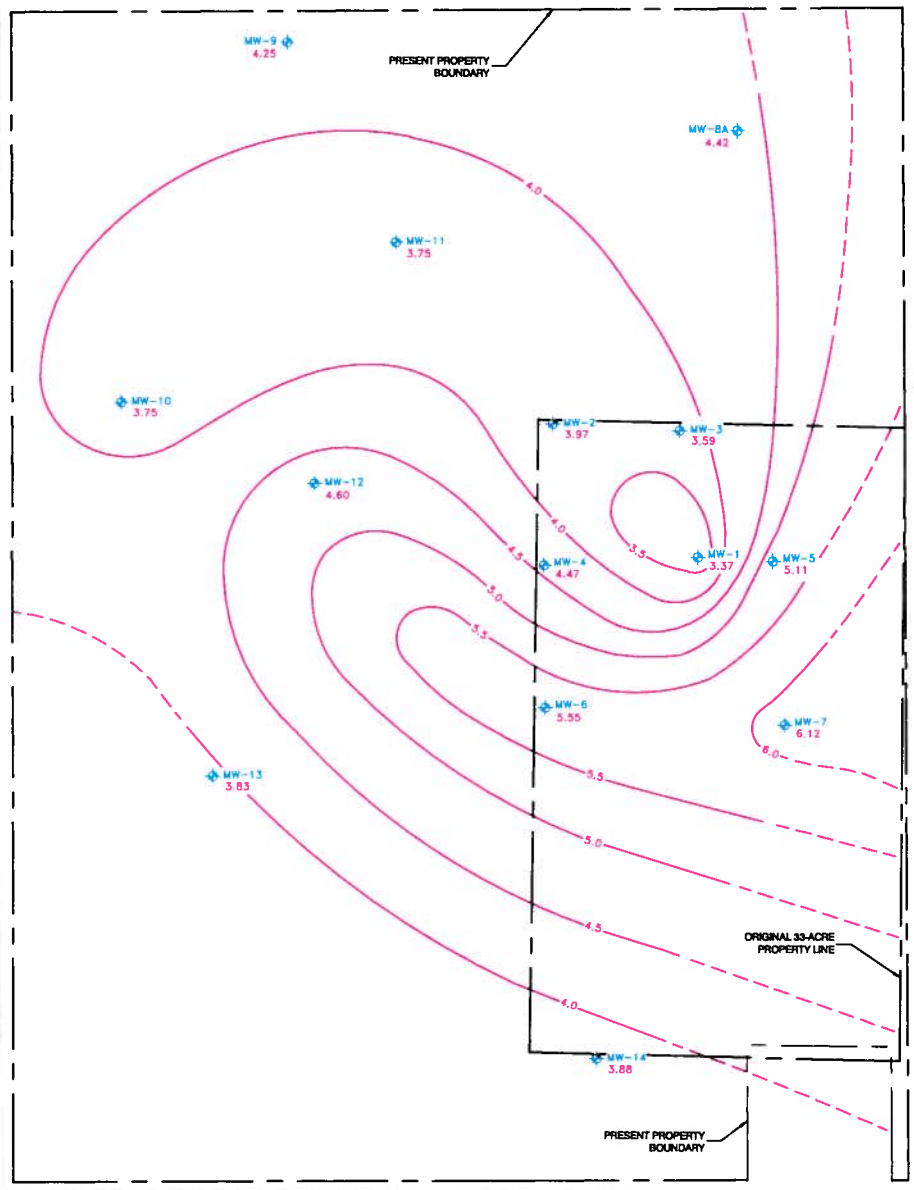
300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax: (228) 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS
Lead Iso-Concentration Map
December 1-2, 2010

DATE 01-04-11
SCALE 1" = 300'
PROJECT NO 9397
FILE C:\CAD\...\GULFPORT PERMIT REVISION\...
FIGURE 5



LEGEND

MW-8A — GROUNDWATER MONITORING WELL LOCATION

4.42 — pH VALUES EXPRESSED IN STANDARD UNITS

— — — pH ISO-CONCENTRATION CONTOUR (DASHED WHERE INFERRED)

300 0 300 600 900

GRAPHIC SCALE – 1" = 300'

COVINGTON
CIVIL & ENVIRONMENTAL, LLC
2200 25th Avenue, Suite A | Gulfport, MS | 39501
Phone: (228) 396-0486 | Fax: (228 396-0487

Former Gulfport Fertilizer Site
Gulfport, MS
pH Contour Map
December 1-2, 2010

DATE 01-04-11
SCALE 1" = 300'
PROJECT NO 9397
FILE C:\CAD\...
FIGURE 6

APPENDIX A

Well Sampling Field Data Sheets

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/1/2010	**CAC Project No.** 9397	**City:** Gulfport	
Sampler: LL/APD	**CAC Project Description:** Gulfport Fertilizer Site	**State:** MS	

Field Equipment

pH Meter No.	**Serial No.**
Conductivity Meter No.	**Serial No.**
Turbidity Meter No.	**Serial No.**

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-8 A	2"	22.54		15.20	5.20	2.92	19.62	14.42

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons): 2.3 14.42		Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons): 7.05		Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
9:50	0:0							
10:00	10:00	2.5	20.3	32.9	.43	4.58	110	3.9
10:04		3.0	20.2	17.1	.40	4.48	107	5.4
10:07		3.5	20.2	16.6	.37	4.46	106	1.7
10:10		4.0	20.3	16.4	.35	4.42	107	1.8
10:13		4.5	20.2	16.3	.34	4.41	105	1.3
10:16		5.0	20.3	16.4	.34	4.42	102	1.4
10:19		5.5	20.3	15.9	.33	4.42	101	1.1
10:21		6.0	20.3	16.0	.34	4.42	103	1.3

Signature of Field Technician: LL / APD

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date:	**CAC Project No.** 9397	**City:**	Gulfport
Sampler:	**CAC Project Description:** Gulfport Fertilizer Site	**State:**	MS

Field Equipment

pH Meter No.	**Serial No.**
Conductivity Meter No.	**Serial No.**
Turbidity Meter No.	**Serial No.**

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-9	2"	22.64		16.13	6.13	5.85	16.79	10.66

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier: 10.66	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons): 1.23	1.77	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	5.2	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
10.35	0							
10:42	7.0	2.0	20.6	0.125	0.48	3.51	201	36.49
10:45	10.0	2.5	20.6	0.124	0.51	3.50	193	9.60
10:50	15.0	3.0	20.7	0.124	0.36	3.67	187	3.39
10.54	19.0	3.5	20.9	0.124	0.33	3.79	178	1.90
10:56	21.0	4.0	20.9	0.123	0.32	3.99	162	1.81
10.58	23.0	4.5	21.1	0.123	0.31	4.64	153	1.93
11.00	25.0	4.8	21.1	0.126	0.30	4.17	145	2.15
11.04	29.0	5.0	21.2	0.125	0.29	4.25	132	2.15
Sample	11:05							

Signature of Field Technician: [signature] @ MW-9 + Dup #1

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date:	**CAC Project No.** 9397	**City:**	Gulfport
Sampler:	**CAC Project Description:** Gulfport Fertilizer Site	**State:**	MS

Field Equipment

pH Meter No.	**Serial No.**
Conductivity Meter No.	**Serial No.**
Turbidity Meter No.	**Serial No.**

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-11	2"	22.85		15.05	5.05	3.97	18.88	13.83

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	2.3	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	6.9	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
11:25	0	0						
11:33	8	2.5	19.9	0.100	0.21	3.16	220	22.0
11:38		3.0	19.8	0.098	0.19	3.24	202	32.8
11:40		3.5	20.0	0.097	0.19	3.35	185	34.2
11:43		4.0	20.2	0.096	0.21	3.43	177	21.8
11:45		4.5	20.1	0.096	6.20	3.52	168	12.9
11:48		5.0	20.2	0.095	0.20	3.63	157	6.8
11:51		5.5	20.3	0.096	0.21	3.68	150	2.97
11:53		6.0	20.3	0.099	0.21	3.71	146	1.90
11:57		6.5	20.3	0.96	0.22	3.75	143	1.50

Collected Sample

Signature of Field Technician: LL/APD

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date:	**CAC Project No.** 9397	**City:**	Gulfport
Sampler:	**CAC Project Description:** Gulfport Fertilizer Site	**State:**	MS

Field Equipment

pH Meter No.	**Serial No.**
Conductivity Meter No.	**Serial No.**
Turbidity Meter No.	**Serial No.**

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
12								
MW-12	2"	28.92		20.95	10.95	7.12	21.80	10.85

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier: 10.85	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	1.77	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	5.31	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)	
12:17	0								
12:22	5.0	2.5	21.6	5.8	2.51	4.37	141	302.0	
12:27		3.0	20.7	6.7	0.99	4.48	129	247.5	
12:32		3.5	20.6	6.7	0.88	4.57	122	259.0	
12:37		4.0	20.7	6.7	0.80	4.58	119	240.0	
12:38		4.5	20.7	6.7	0.74	4.56	118	251.7	
12:41		5.0	20.8	6.8	0.72	4.58	117	241.3	
12:44		5.5	20.8	6.8	0.66	4.60	116	254.5	Sampled

Signature of Field Technician: LL / ATD

DTW

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/1/10	CAC Project No. 9397	City: Gulfport	
Sampler: LL/APD	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-13	2"	32.36		24.30	14.30	7.00	25.36	11.06

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.06	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	~~11.8~~	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.4	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)	
1327	0:00	—							
13:~~30~~		2.5	22.1	6.2	0.74	3.86	217	18.3	
13:37		3.0	22.1	6.1	0.64	3.86	219	11.3	
13:40		3.5	22.0	6.1	0.61	3.85	221	7.6	
13:43		4.0	22.1	6.1	0.59	3.84	222	6.9	
13:47		4.5	22.1	6.1	0.56	3.84	222	5.3	
13:~~50~~		5.0	22.1	6.0	0.54	3.82	223	5.2	
* 13:53		5.5	22.1	6.0	0.52	3.83	222	5.1	collected sample

Signature of Field Technician: LL / APD

(828) 273-9549

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/1/10	CAC Project No. 9397	City: Gulfport	
Sampler: LL/APD	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-10	2"	27.69		19.73	9.73	6.91	20.78	11.05

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.05	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.8	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.4	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
~~11:55~~	0							
1412	0:							
14:20	2.0	2.0	20.1	6.0	1.98	3.84	259	76.30
14:25	3.0		20.0	6.4	1.13	3.78	263	21.0
14:30	3.5		20.0	6.6	0.96	3.76	265	10.9
14:35	4.0		20.0	6.6	0.90	3.76	265	10.0
14:38	4.5		20.0	6.6	0.73	3.76	266	7.5
14:40	5.0		20.0	6.6	0.66	3.75	267	7.1
14:45			20.0	6.6	0.64	3.75	267	7.1
Sample								

Signature of Field Technician: APD / WML

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/11/10	CAC Project No. 9397	City: Gulfport	
Sampler: LL/AFD	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-14	2"	34.08		25.83	15.83	7.62	26.46	10.58

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	1.72	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	5.2	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
14:58	0	start						
15:06		2.0	21.7	6.1	2.73	3.85	279	1.9
15:09		2.5	21.7	6.1	2.58	3.85	279	1.9
15:12		3.0	21.7	6.2	2.37	3.87	278	1.8
15:15		3.5	21.7	6.1	2.28	3.87	278	1.3
15:18		4.0	21.7	6.1	2.20	3.88	276	1.0
15:21		4.5	27.6	6.1	2.12	3.88	276	0.7
15:23		5.0						
Sample								

Signature of Field Technician: LL/AFD

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/2/10	CAC Project No. 9397	City: Gulfport	
Sampler: LL/[redacted]RH	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-4	2"	28.28	25.93	20.40	10.40	3.12	25.16	14.76

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	14.76	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	2.4	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	7.2	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
08:48								
08:57		2.0	20.4	47.7	.31	4.49	140	1.3
09:00		2.5	20.4	47.5	.34	4.49	134	1.1
09:03		3.0	20.4	48.2	.38	4.49	128	2.0
09:06		3.5	20.4	48.9	.32	4.49	125	.8
09:08		4.0	20.4	49.0	.32	4.48	124	1.2
09:10		4.5	20.4	49.4	.32	4.48	123	1.6
09:12		5.0	20.4	49.8	.32	4.47	121	1.3
09:12	Collected Sample							

Signature of Field Technician: R H / L. H

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/2/10	CAC Project No. 9397	City: Gulfport	
Sampler: LL/ADD	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-2	2"	28.75	25.89	20.95	10.95	6.06	22.69	11.74

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.74	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.91	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.74	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
09:20								
09:30		2.0	20.4	35.2	.43	3.42	236	25.3
09:33		2.5	20.4	34.5	.45	3.44	240	8.0
09:36		3.0	20.4	34.2	.44	3.45	244	3.6
09:39		3.5	20.4	33.8	.36	3.46	248	3.5
09:41		4.0	20.4	33.6	.35	3.47	250	2.8
09:43		4.5	20.5	34.4	.28	3.47	252	1.7
09:45		5.0	20.4	37.3	.27	3.47	254	1.6
09:46	Samples Collected							
*	Collected Duplicate Sample #2 @ MW-2							

Signature of Field Technician: RH/LL

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/7/10	CAC Project No. 9397	City: Gulfport	
Sampler: LL/APD	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-3	2"	30.26	27.46	21.32	11.32	7.22	23.04	11.72

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.72	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.91	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.73	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
09:58								
10 05		2.0	21.1	25.5	.20	3.50	285	20.1
10:09		2.5	21.1	25.4	.29	3.53	280	5.5
10:11		3.0	21.1	25.4	.29	3.56	276	2.5
10:13		3.5	21.1	26.9	.29	3.56	279	1.7
10:15		4.0	21.1	32.0	.29	3.56	274	2.2
10:17		4.5	21.1	49.0	.28	3.57	270	1.2
10:19		5.0	21.1	76.5	.28	3.59	268	.95
10:19	Samples Collected							

Signature of Field Technician:

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/2/10	CAC Project No. 9397	City: Gulfport	
Sampler: LC/APP	CAC Project Description: Gulfport Fertilizer Site	State: MS	

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-1	4"	32.43	29.35	27.26	17.26	8.12	24.31	7.05

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		1" Well		4" Well	
Well Multiplier:	0.023	Well Multiplier:	0.041	Well Multiplier:	0.653
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	7.05
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	4.60
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	13.81

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
10:50								
11:00		2.5	21.2	53.8	4.17	3.74	331	0.0
11:05		3.0	21.3	57.4	3.64	3.65	341	3.10
11:07		3.5	21.3	59.4	3.24	3.57	348	3.1
11:10		4.0	21.4	60.4	2.64	3.51	354	1.3
11:13		4.5	21.4	62.7	2.27	3.47	358	1.3
11:15		5.0	21.4	63.5	2.05	3.38	364	1.5
11:17		5.5	21.4	63.7	1.78	3.38	365	0.0
11:19		6.0	21.4	64.0	1.60	3.38	366	1.0
11:21		6.5	21.5	64.3	1.40	3.37	366	1.0
11:23		7.0	21.5	64.4	1.31	3.38	366	1.01
11:25		7.5	21.5	64.6	1.21	3.37	366	0.5
11:27		8.0	21.5	64.4	1.14	3.37	365	0.6

Signature of Field Technician: R.H/L.C

* 11:27 - Samples Collected

NOTE - MW-1 Casing modified (extend up) in Oct 2007 TOC elevation noted on this data sheet reflects "newly" surveyed modification.

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/7/16	**CAC Project No.** 9397	**City:** Gulfport	
Sampler: LC/APD	**CAC Project Description:** Gulfport Fertilizer Site	**State:** MS	

Field Equipment

pH Meter No.	**Serial No.**
Conductivity Meter No.	**Serial No.**
Turbidity Meter No.	**Serial No.**

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-5	2"	32.10	29.25	23.19	13.19	6.92	25.18	11.99

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481.X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.99	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.95	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.86	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
11:42								
11:49		2.0	22.1	35.4	.77	4.99	303	19.8
11:51		2.5	22.0	37.4	.61	5.06	297	3.60
11:53		3.0	22.1	38.1	.52	5.06	291	3.3
11:55		3.5	22.1	38.1	.47	5.08	286	1.9
11:57		4.0	22.1	39.1	.45	5.09	280	1.5
11:59		4.5	22.0	39.1	.41	5.10	275	1.4
12:01		5.0	22.1	39.5	.38	5.11	270	
12:01	Samples Collected							

Signature of Field Technician: RH/LC

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/2/10	CAC Project No. 9397	City:	Gulfport
Sampler: LL/APD	CAC Project Description: Gulfport Fertilizer Site	State:	MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-6	2"	34.29	31.23	25.34	15.34	7.51	26.78	11.44

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.44	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.86	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.59	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
12:28								
12:37		2	22.0	65.9	.50	5.73	77	1.8
12:39		2.5	22.0	66.0	.42	5.75	58	1.7
12:41		3.0	22.0	66.0	.37	5.75	49	1.7
12:43		3.5	22.0	66.0	.34	5.75	45	1.1
12:45		4.0	22.0	66.0	.31	5.76	36	1.4
12:47		4.5	22.0	66.0	.29	5.77	32	1.1
12:49		5.0	22.0	65.6	.28	5.78	27	.87
12:49	Sampler Collected							

Signature of Field Technician: RH/LL

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

Sampling Date: 12/2/10	CAC Project No.	9397	City: Gulfport
Sampler: LL/APP	CAC Project Description:	Gulfport Fertilizer Site	State: MS

Field Equipment

pH Meter No.	Serial No.
Conductivity Meter No.	Serial No.
Turbidity Meter No.	Serial No.

Well Information

Well No.	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feet)	Water Column (Feet)
MW-7	2"	33.48	30.75	24.54	14.54	6.95	26.53	11.99

Well Casing Construction:

Calibration for Well Volume
(Water Column, in Feet X 7.481 X Well Multiplier)

3/4" Well		2" Well		6" Well	
Well Multiplier:	0.023	Well Multiplier:	0.163	Well Multiplier:	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	11.99	Well Volume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	1.95	Well Volumes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	5.85	Min. Volume to be Purged (Gallons):	

Sampling Information

Purging Methodology:

Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity (mS/cm)	Dissolved Oxygen (ppm)	Field pH	Oxygen Reduction Potential (mV)	Field Turbidity (NTU)
13:00								
13:07		2.0	21.9	43.7	.91	6.09	39	13.2
13:09		2.5	22.0	43.3	.77	6.08	40	6.5
13:11		3.0	22.0	43.8	.63	6.10	40	5.1
13:13		3.5	22.0	42.5	.59	6.11	41	2.4
13:15		4.0	22.0	42.2	.55	6.10	42	2.2
13:17		4.5	22.0	42.0	.50	6.11	43	1.82
13:19		5.0	22.0	42.0	.48	6.12	43	1.4
13:20	Samples Collected							

Signature of Field Technician: RH/LL

APPENDIX B

Laboratory Analytical Report Sheets and

Chain-Of-Custody Forms

ESC
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Est. 1970

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

Report Summary

Wednesday December 22, 2010

Report Number: L493520
Samples Received: 12/03/10
Client Project: 9397.00

Description: Gulfport Fertillzer

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Craig Cothron , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - I-2327, CT - PH-0197, FL - E87487
GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704, ND - R-140
NJ - TN002,NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032008A,
TX - T104704245, OK-9915

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.
Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-01

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-8

Collected By : L. Larson
Collection Date : 12/01/10 10:21

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.023	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-02

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-9

Collected By : L. Larson
Collection Date : 12/01/10 11:08

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.017	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-03

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-11

Collected By : L. Larson
Collection Date : 12/01/10 11:57

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0013	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.017	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-04

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-12

Collected By : L. Larson
Collection Date : 12/01/10 12:44

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0018	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	0.0043	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.0052	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit (PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

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Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-05

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-13

Collected By : L. Larson
Collection Date : 12/01/10 13:53

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	0.0012	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.030	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

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Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-06

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-10

Collected By : L. Larson
Collection Date : 12/01/10 14:45

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.023	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-07

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-14

Collected By : L. Larson
Collection Date : 12/01/10 15:23

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/21/10	1
Lead,Dissolved	0.034	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-08

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : DUP-1

Collected By : L. Larson
Collection Date : 12/01/10 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.022	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
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Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-09

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-4

Collected By : L. Larson
Collection Date : 12/02/10 09:12

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0098	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	0.0029	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.012	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-10

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-2

Collected By : L. Larson
Collection Date : 12/02/10 09:46

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.018	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	0.0089	0.0010	mg/l	6020	12/18/10	1
Lead	0.0034	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.022	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-11

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-3

Collected By : L. Larson
Collection Date : 12/02/10 10:19

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.015	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	0.0038	0.0010	mg/l	6020	12/18/10	1
Lead	0.0012	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.018	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-12

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-1

Collected By : L. Larson
Collection Date : 12/02/10 11:27

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.021	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	0.017	0.0010	mg/l	6020	12/18/10	1
Lead	0.072	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.074	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-13

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-5

Collected By : L. Larson
Collection Date : 12/02/10 12:01

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.0017	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-14

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-6

Collected By : L. Larson
Collection Date : 12/02/10 12:49

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.015	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	0.013	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-15

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : MW-7

Collected By : L. Larson
Collection Date : 12/02/10 13:20

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0036	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	0.0012	0.0010	mg/l	6020	12/18/10	1
Lead	BDL	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	BDL	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

ESC
LAB SCIENCES
YOUR LAB OF CHOICE

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Mt. Juliet, TN 37122
(615) 758-5858
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Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Mr. Lars Larson
Covington & Associates
2200-A 25th Avenue
Gulfport, MS 39501

December 22, 2010

ESC Sample # : L493520-16

Site ID :

Project # : 9397.00

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Sample ID : DUP-2

Collected By : L. Larson
Collection Date : 12/02/10 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.019	0.0010	mg/l	6020	12/20/10	1
Arsenic,Dissolved	0.0085	0.0010	mg/l	6020	12/18/10	1
Lead	0.0036	0.0010	mg/l	6020	12/20/10	1
Lead,Dissolved	0.082	0.0010	mg/l	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

.
Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

Summary of Remarks For Samples Printed
12/22/10 at 10:29:11

TSR Signing Reports: 034
R5 - Desired TAT

Sample: L493520-01 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-01
Sample: L493520-02 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-02
Sample: L493520-03 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-03
Sample: L493520-04 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-04
Sample: L493520-05 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-05
Sample: L493520-06 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-06
Sample: L493520-07 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-07
Sample: L493520-08 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-08
Sample: L493520-09 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-09
Sample: L493520-10 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-10
Sample: L493520-11 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-11
Sample: L493520-12 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-12
Sample: L493520-13 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-13
Sample: L493520-14 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-14
Sample: L493520-15 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-15
Sample: L493520-16 Account: COVASSOC Received: 12/03/10 09:00 Due Date: 12/20/10 00:00 RPT Date: 12/22/10 10:28
Relogged from L492019-16

Covington & Associates

2200-A 25th Avenue
Gulfport,MS 39501

Billing information:

Mr. Lars Larson
2200-A 25th Avenue

Gulfport,MS 39501

Report to: Mr. Lars Larson

Email: lars@covingtonassociates.net

Project Description: Gulfport Fertillzer

City/State Collected:

Phone: (228) 396-0486
FAX:

Client Project #: 9397.00

Lab Project #: COVASSOC-GULFPORT

Collected by (print): L. Larson

Site/Facility ID#:

P.O.#:

Collected by (signature):

Immediately Packed on Ice N ___ Y X

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day 100%
___ Two Day 50%
___ Three Day 25%

Date Results Needed

Email? ___No X Yes
FAX? ___No ___Yes

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDICP / PBDICP 500ml HDPE-NoPres	ASICP / PBICP 500ml HDPE-HNO3						
MW-8	G RM3	GW		12/1/10	1021	2	X	X						
MW-9	1	GW			1108	2	X	X						
MW-11	1	GW			1157	2	X	X						
MW-12	1	GW			1240	2	X	X						
MW-13		GW			1353	2	X	X						
MW-10		GW			1445	2	X	X						
MW-14		GW			1523	2	X	X						
DUP-1	✓	GW		✓	—	2	X	X						
		GW				2	X	X						

Analysis/Container/Preservative: E007

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other ____

Remarks: Need very low detection limits

pH ____ Temp ____

Flow ____ Other ____

4355 93109040

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
	12/2/10	1430	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)
			12/3/10

Samples returned via: ☐ UPS ☑ FedEx ☐ Courier ☐ ____
Temp: 2.3°C Bottles Received: 32
Date: 12-3-10 Time: 0900
Condition: OK (lab use only)
COC Seal Intact: ___ Y ___ N ✓ NA
pH Checked: C2 NCF:

Chain of Custody
Page 1 of 2

ESC LAB SCIENCES
12065 Lebanon Road
Mt. Juliet, TN 37122

Phone: (800) 767-5859
Phone: (615) 758-5858
Fax: (615) 758-5859

L493520

Account: COVASSOC (lab use only)
Template/Prelogin: T165389/P338146
Cooler #: 11-11
Shipped Via: FedEx Ground

Remarks/Contaminant	Sample # (lab only)
	L492019-01
	02
	03
	04
	05
	06
	07
	08

Covington & Associates

2200-A 25th Avenue
Gulfport,MS 39501

Billing information:

Mr. Lars Larson
2200-A 25th Avenue

Gulfport,MS 39501

Report to: Mr. Lars Larson

Email: lars@covingtonassociates.net

Project Description: Gulfport Fertilizer

City/State Collected:

Phone: (228) 396-0486
FAX:

Client Project #: 9397.00

Lab Project #: COVASSOC-GULFPORT

Collected by (print):

Site/Facility ID#:

P.O.#:

Collected by (signature):

Immediately Packed on Ice N ___ Y X

Rush? (Lab MUST Be Notified)
___ Same Day 200%
___ Next Day 100%
___ Two Day 50%
___ Three Day 25%

Date Results Needed

Email? ___No X Yes
FAX? ___No ___Yes

Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	No. of Cntrs	ASDICP / PBDICP 500ml HDPE-NoPres	ASICP / PBICP 500ml HDPE-HNO3
MW-4	GRAB	GW		12/2/10	9:12	2	X	X
MW-2		GW			9:46	2	X	X
MW-3		GW			10:19	2	X	X
MW-1		GW			11:27	2	X	X
MW-5		GW			12:01	2	X	X
MW-6		GW			12:49	2	X	X
MW-7		GW			13:20	2	X	X
DUP-2		GW				2	X	X
		GW				2	X	X

*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____

Remarks: Low Detection Limits

Analysis/Container/Preservative

Chain of Custody
Page 2 of 2

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12065 Lebanon Road
Mt. Juliet, TN 37122

Phone: (800) 767-5859
Phone: (615) 758-5858
Fax: (615) 758-5859

L493520

Acctnum: COVASSOC (lab use only)
Template/Prelogin: T65389 P338146
Cooler #: 1141 KD
Shipped Via: FedEx Ground

Remarks/Contaminant — Sample # (lab only)

~~L492819~~ 09
~~L492819~~ 10
11
12
13
14
15
16

pH _____ Temp _____

Flow _____ Other _____

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
	12/2/10	1430	
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)
Relinquished by: (Signature)	Date:	Time:	Received for lab by: (Signature)
			1500

Samples returned via: ☐ UPS ☑ FedEx ☐ Courier ☐ ____
Temp: 2.3° Bottles Received: 32
Date: 12-3-10 Time: 0800

Condition: OK (lab use only)
COC Seal Intact: ___Y ___N ✓NA
pH Checked: 2.2 NCF: