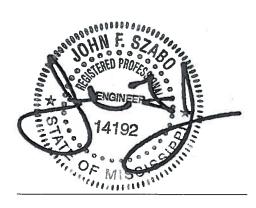
FINAL CORRECTIVE ACTION PLAN

Former Gulfport Fertilizer Site 33rd Street
Gulfport, Mississippi

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

January 2009





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1.0 INTRODUCTION

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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 superphosphate 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.

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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.

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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

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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.

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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 MDEO 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

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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, proofrolling 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.

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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	Completion after
Action Measure	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	Monitoring Wells installed. Will be sampled semi-
and Monitoring	annually for 3 years after completion of Capping
	Operations.
Capping of Arsenic/Lead	6 months after Approval
Contaminated Soil	**
Protection of Existing	In accordance with Use Restriction
Wetlands	
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

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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

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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. 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-ofcustody 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.

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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

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Environmental Engineers and Consultants

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

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.

Final Corrective Action Plan

Former Gulfport Fertilizer Site, Gulfport, Mississippi
January 2009

area requiring a second 18" excavation pass.

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 fortyfive (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

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FIGURES

Figure 1 SITE LOCATION

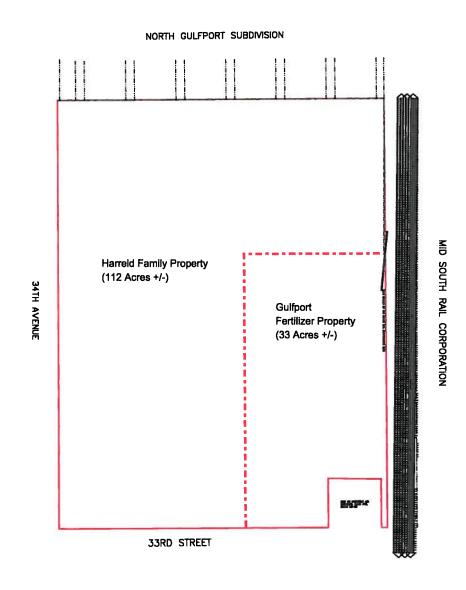


Figure 2 PROPERTY



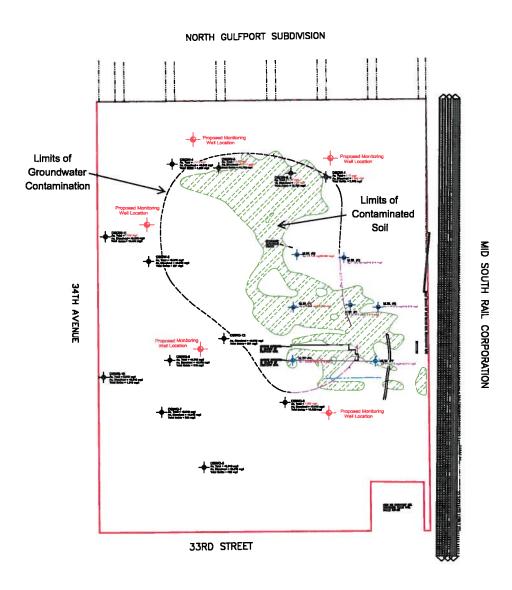


Figure 3
SOIL AND GROUNDWATER
CONTAMINATION



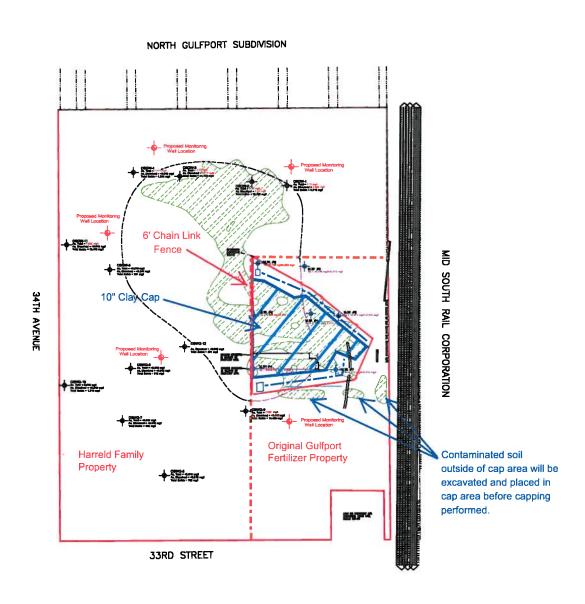
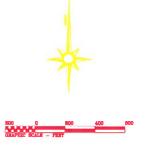
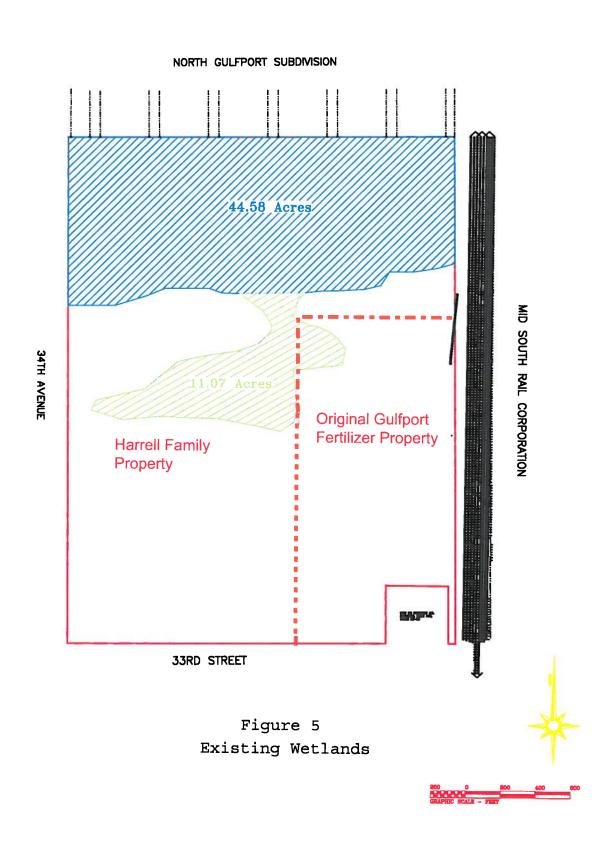


Figure 4
Security Fencing and
10" Clay Cap



High Quality Wetlands
Medium Quality Wetlands



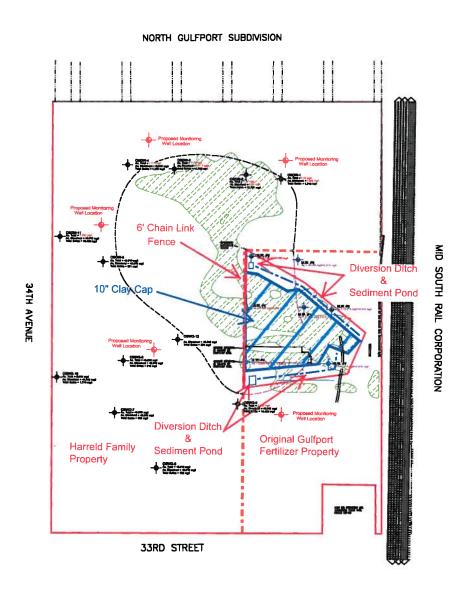
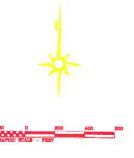


Figure 6
Stormwater Run-Off
Controls



COVINGTON CIVIL & ENVIRONMENTAL, LLC

14257 Dedeaux Road, Suite B Gulfport, MS 39503 PHONE: FAX: E-MAIL: 228-396-0486 228-396-0487

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

COVINGTON CIVIL & ENVIRONMENTAL, LLC Responses to MDEQ Final Corrective Action Plan (FCAP) Comments Gulfport Fertilizer, Gulfport, Mississippi

February 3, 2009/Page 2

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"

COVINGTON CIVIL & ENVIRONMENTAL, LLC Responses to MDEQ Final Corrective Action Plan (FCAP) Comments Gulfport Fertilizer, Gulfport, Mississippi

February 3, 2009/Page 3

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.

COVINGTON CIVIL & ENVIRONMENTAL, LLC
Responses to MDEQ Final Corrective Action Plan (FCAP) Comments
Gulfport Fertilizer, Gulfport, Mississippi

February 3, 2009/Page 4

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. Senior Consultant

Anther P. Damar fr

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. 509 00

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

<u>ORDER</u>

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:

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

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

August 6, 2008



COMMITTEE ASSIGNMENTS: Environmental Protection, Conservation & Water,

Vice Chairman Investigate State Offices, Vice Chairman County Affairs **Enrolled Bills**

Oil, Gas & Other Minerals

Finance Insurance

Ports & Marine Resources

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.

Tony Russel

Thank you for your consideration in this matter.

Yours truly,

Deborah Dawkins

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

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>



bcc

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

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

PHONE: FAX:

228-396-0486

Biloxi, MS 39532

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.

August 5, 2008 /Page 2

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 below 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 runoff 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

August 5, 2008 /Page 3

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

August 5, 2008 /Page 4

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 An Interim Corrective Action Plan has been prepared, submitted, reviewed, delineated. 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,

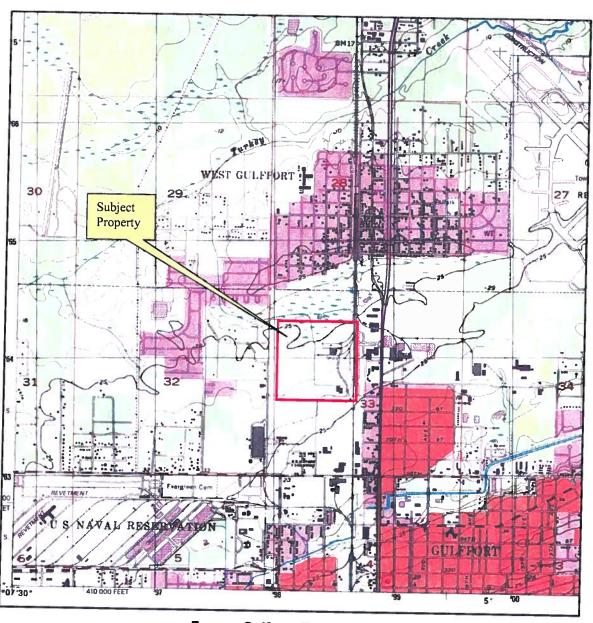
Covington & Associates Corporation

John F. Szabo, P.E. Managing Principal

ENCLOSURES

cc: Mr. Delma Powell, Hancock Bank

August 5, 2008 /Page 5



Former Gulfport Fertilizer Site Gulfport, Mississippi

August 5, 2008 /Page 6

Attachment #1

Ecological Checklist

August 5, 2008 /Page 7

Section I- Facility Information

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY BROWNFIELD VOLUNTARY CLEANUP PROGRAM ECOLOGICAL CHECKLIST

1.	Name of Facility: torner (nullant Fertilizer Site
2.	Location of Facility: 33rd St. 34th Arroy Caulant MS
	County: Hacrison County
3.	Mailing Address:
4.	Type of Facility: Former Super presents feetilizer production facility
5.	Describe land use at and in the yicinity of the release site
	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.
600	tion 2 Comments to the last of
300	tion 2-Surrounding Land Use Information
1	Describe land use adjacent to the facility.
	Pomode Constitution 11
2.	Provide the following information regarding the nearest water body:
	Name of surface water body:
	Type of surface water body (pond, lake, river etc:
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.
	ues - Jurisdictional Wetlank on the site
Sect	tion 3 - Release Information
1.	Nature of release.
2,	Location of the release (within the facility)
3.	ocation of the release with respect to the facility property boundaries:
	Leatral to Mothern Dartin 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?
	If yes, describe the designated use of the land impacted:

August 5, 2008 /Page 8

Section 4 - Criteria for Further Assessment

If the Area of Impact (AOI) meets <u>all</u> of the criteria presented below, then typically no further ecological evaluation shall be required. If the AOI <u>does not</u> meet <u>all</u> 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 Sec 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:

Name of person submitting this check list:

Affiliation:

Signature

Additional Preparers:

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Attachment #2

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

August 5, 2008 /Page 10



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

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.

R# 6679

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.

August 5, 2008 /Page 11

Sincerely,

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

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 <u>not</u> 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.



Covington & Associates Corporation Anthony P. Damiano, Jr. Senior Consultant 1636 Popps Ferry Road Biloxi, Mississippi 39532

Tel:

228-396-0486

Fax: Cell: 228-396-0487 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.

August 5, 2008 /Page 2

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 below 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 runoff 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

August 5, 2008 /Page 3

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

August 5, 2008 /Page 4

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 An Interim Corrective Action Plan has been prepared, submitted, reviewed, delineated. 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,

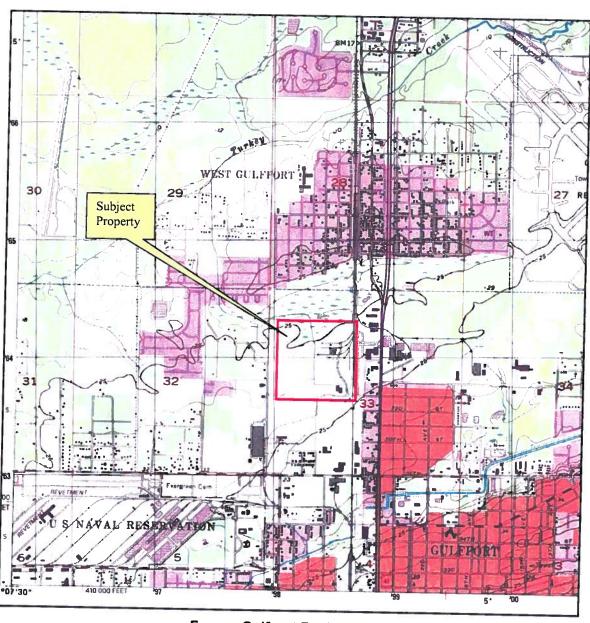
Covington & Associates Corporation

John F. Szabo, P.E. Managing Principal

ENCLOSURES

cc: Mr. Delma Powell, Hancock Bank

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Former Gulfport Fertilizer Site Gulfport, Mississippi

August 5, 2008 /Page 6

Attachment #1

Ecological Checklist

August 5, 2008 /Page 7

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY BROWNFIELD VOLUNTARY CLEANUP PROGRAM ECOLOGICAL CHECKLIST

Se	ction I- Facility Information
1. 2. 3. 4. 5.	Name of Facility: Tormer Coulont Feeblesc Site
Sec	tion 2-Surrounding Land Use Information
	Promocula Compressed light Infustrial Same (Condential to North 1 Nu.)
Sect	ion 3 - Release Information
1. 2. 3.	Nature of release. Location of the release (within the facility) Location of the release with respect to the facility property boundaries: Chemicals of Concern (COC) knewn or suspected to have been released: Chemicals of Concern (COC) knewn or suspected to have
5.	Indicate which media are known or suspected to be impacted and if sampling data are available:
	Soil O.6 feet has
	surface water/sediment yes no
6.	Has migration occurred outside the facility program handsing?
	If yes, describe the designated use of the land impacted:

August 5, 2008 /Page 8

Section 4 - Criteria for Further Assessment

If the Area of Impact (AOI) meets <u>all</u> of the criteria presented below, then typically no further ecological evaluation shall be required. If the AOI <u>does not</u> meet <u>all</u> 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: Place Sec 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

Name of person submitting this check list:

Affiliation:

Signature

Additional Preparers:

August 5, 2008 /Page 9

Attachment #2

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

August 5, 2008 /Page 10



MISSISSIPPI DEPARTMENT OF WILDLIFE, FISHERIES, AND PARKS

Sam Polles, Ph.D.

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.

August 5, 2008 /Page 11

Sincerely,

Andy Sanderson, Research Biologist Mississippi Natural Heritage Program

(601) 354-6367, ext. 117

The Mississippi Natural Heritage Program (MNIP) 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 MNIP 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 MNIP 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.



HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

MEMORANDUM

TO:

Gulfport Fertilizer Site File

Gulfport, MS

FROM:

Tony Russell

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 Fertilizes
Gulfport, Ms,
7-16-08





berm around stock piles



Short pile of hapandors maderal tong



Stock piles labeled with red numbers - haverbox huste



Butground - Stock piles of soil to be treated Foreground - amendment maderial to don't soil



Area to stock pile treated soil

Galfport Fertilizer Gulfport, Mc, 7-16-08



Amendment material - used to freat soil - 3% by whome



treatment Area



Treatment Area - Berned & Lined



weasuring freshment my deviet



Bobost - transferring freatment material to treatment confermen



Deeon Area

Gulfport Fertilizer Gulfport, Ms. 7-14-08



Mixing 10 yes soil with amendment musterial



MIKING



Mixing



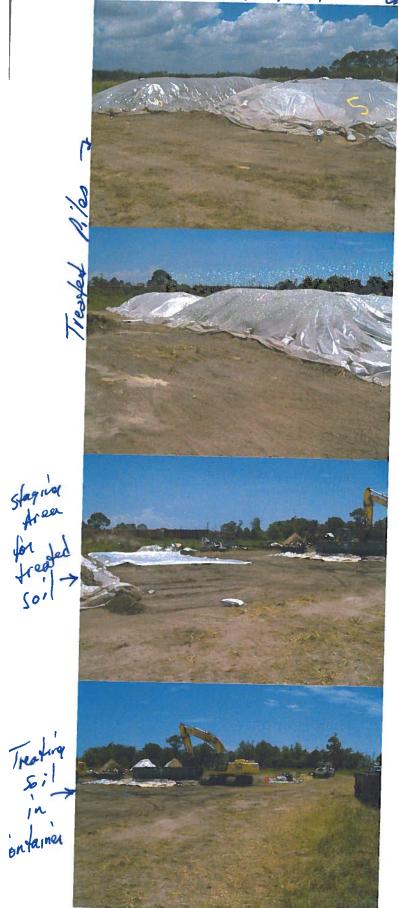
Finished mixing - moving to loader for transfer to storage area

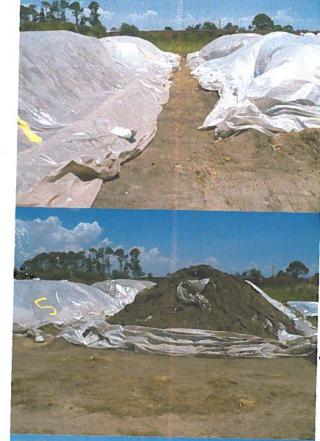


got trousier go squage area

Storage Area

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Treatmen

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HALFY BARBOUR GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

April 3, 2008



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,

Project Manager

Tony Russell, Chief

Assessment and Remediation Branch

cc: John Szabo, Covington & Associates



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



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 Manager²

Tony Russell, Chief

Assessment and Remediation Branch

cc: John Szabo, Covington & Associates

COVINGTON AND ASSOCIATES

1636 Popps Ferry Road, Suite M-5 Blioxi, MS 39532 PHONE:

228-396-0486 228-396-0487

FAX:

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

DEPT. OF ENVIRONMENTAL QUALITY
REC'D

FEB 2 1 2008

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.

<u>Section 7.0 Performance Monitoring Plan.</u> 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.

COVINGTON AND ASSOCIATES CORPORATION

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

February 18, 2008/Page 2

<u>Figures 1, 3 and 7</u> 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 μ g/L and 15 μ g/L, respectively. Agreed – Figures 2, 3 and 5 have been revised as reflected in the Interim Corrective Action Plan.

<u>Site Health and Safety Plan</u>. 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

Amther P. Damars fr

ENCLOSURES

John F. Szabo, P.E. Managing Principal



HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR January 18, 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 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



HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

MEMORANDUM

TO:

Gulfport Fertilizer-File

FROM:

Gulfport, Mississippi Kayra N. Johnson, P.E. K

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





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: N

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

OCT - 9 2007

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 rescheduling 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



COVINGTON AND ASSOCIATES CORPORATION

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

September 28, 2007/Page 2

moving this project forward.

CC:

Very truly yours,

COVINGTON AND ASSOCIATES CORPORATION

John F. Szabø, P.E. *Principa*l

Mr. Delma Powell, Hancock Bank

Ms. Joy Lambert Phillips, Hancock Bank



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.

Mr. John M. Hairston June 27, 2005 Page 2 of 3

j. Confirmation sampling procedures.

k. Surveying of excavated/remediated areas and confirmation sampling points.

I. Backfilling to final grade procedures.

m. Final surface preparation.

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

- 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

Mr. John M. Hairston June 27, 2005 Page 3 of 3

Project Manager

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.

Tony Russell, Chief

Assessment & Remediation Branch

cc: Mr. John Szabo, Covington & Associates



HALEY BARBOUR GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

MEMORANDUM

TO:

Gulfport Fertilizer Site File

FROM:

Tony Russell # 19/14/07

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.



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.

Jung Barba

Gulfport Fertilizer

214-0413

Je Joy Phillips

OF POLLUTION CONTROL



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

WILLIAM L. GUICE III
ATTORNEY
LICENSED IN: Mind seippi. Texas, District of Columbia

R. SCOTT WELLS
ACTORNEY
Licenses In: Mississippi, Louisiana

604 Poirrer Ave. Ocean Springs, MS 39564

P.O. Box 1925 Billoxi, MS 39533-1925

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

June 11, 2007

MARIA M. COBB ATTORNEY Lelensed In: Missiesippi, Ludisiana

LAURRN S. DUVERNAY ATTORNEY Licensed In: Mississippi, American

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

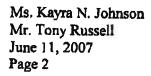
Re:

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.



From-KUSHING AND GUICE

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

Very truly yours,

RUSHING & GUICE, PLLC

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

LICENSED IN: MISSISSIPPI, LOUISIANA

604 PORTER AVENUE OCEAN SPRINGS, MS 39564

Pos'r Office Box 1925 BILOXI , MS 39533-1925

PHONE 22H-875-5263 FAX: 228-875-5987

www niching-pitice com atry@hushing-puice.com

MARIA M. CUBE ATTORNEY

LICENSED IN: MISSISSIPPL LOUISIANA

> LAHREN DUVERNAY ATTORNEY

LICENSED IN: MISSISSIPPI, ALABAMA

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

The following telecopy transmission may contain confidential and privileged information intended for the use of the persons(s) named above. Review and/or use by any other party is strictly prohibited. If you are not the intended recipient, please call the office of Rushing & Guice, P.L.L.C immediately. Your cooperation is appreciated.

MESSAGE:

Please see attached correspondence.



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



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



COVINGTON AND ASSOCIATES CORPORATION

Status of Project Former Gulfport Fertilizer Site, Gulfport, Mississippi

January 9, 2007/Page 2

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. Prindipal

Cc: Mr. Delma Powell, Hancock Bank



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



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

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 Fertlilzer 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:



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

Response to MDEQ Letter dated June 27, 2005 Interim Corrective Action Plan

July 11, 2005 /Page 2

a. <u>Site Preparation:</u> 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. <u>Utility Location and Identification:</u> 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. <u>Decontamination Area and Procedures:</u> 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. <u>Storm water Run-on/Run-off Control:</u> 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 Soll 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

Response to MDEQ Letter dated June 27, 2005 Interim Corrective Action Plan

July 11, 2005 /Page 3

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.

I. 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. 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

Response to MDEQ Letter dated June 27, 2005 Interim Corrective Action Plan

July 11, 2005 /Page 4

property owner.

- c. Long-Term Groundwater Monitoring Plan: A long-term groundwater monitoring plan will be included in the Final Corrective Action Plan.
- d. <u>Ecological Risk Assessment:</u> 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, F.E.



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:

- 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.

Mr. John M. Hairsto June 27, 2005 Page 2 of 3

j. Confirmation sampling procedures.

k. Surveying of excavated/remediated areas and confirmation sampling points.

I. Backfilling to final grade procedures.

m. Final surface preparation.

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

- 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 Plans 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

Mr. John M. Hairston June 27, 2005 Page 3 of 3

Project Manager

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,

Tony Russell, Chief

Assessment & Remediation Branch

cc: Mr. John Szabo, Covington & Associates

Covington & Associates Corporation

Environmental Engineers and Consultant



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



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*.





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

May 31, 2005 /Page 2

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.



P.O. Box 177 Pass Christian, MS 39571

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;

-

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

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 proposed CAP is summarized.

<u>Summary of Proposed Corrective Action Plan (CAP):</u> 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:



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

April 29, 2005 /Page 2

- 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

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

April 29, 2005 /Page 3

property 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 develop the areas where these soils are located. Until the Port Authority is ready to 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.

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

April 29, 2005 /Page 4

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.

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 State	Covingon & Asso.	. Itseaboæbellsouth, not	228-216-1158
Phil Bass	ms DEQ	Phil-Bass @ deg. state.ms.ce	
charlo chisola	MIDER	U	6d 866 5000
GEONGE SCHLOEGEL	HANCOCK BANK	GEOAGE_SCHLIFGEL @ MARINESA	228 868 4706
JOHN HALADY	11	JOHN_HAIRSTON @ HANCOCKBANK.	
DON Allee	PORT GULFART	dra@shipmspa.com	2288654300
John Wobb	ic te	Iwab @shipmspa.com	t.
JERRY BANKS	MSDEQ	Jerry-Banks@deg. state msis	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 V	MDEQ	Brian_Young@deq.state.ms.us	(601) 961-5088
John Stato	Covinten & April	jfsant og bella som met	258-516-1128
PATRICK Chubb	Covington Associates	Chulob @ covington Associates. net	228.860.0554
Lars Larson	Covingen Assa.	larslarsone bellsouth net	

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.

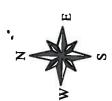
Location of Meeting:

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





DEC 7 2004

DEC-OPC

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.

IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE.

Date:	12-1-04
To:	Brian Young, Project Manager
	MS Dept. of Environmental Quality
Fax No.:	401-354-6612
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

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



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

November 12, 2004 /Page 2

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. Szabø, P.E. Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank/Enclosures

TABLES







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	
OSGW-12	<0.010	<0.010	19,400 391

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, Existin

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)



Analytical Results for Groundwater Samples Collected October 20 and 21, 2004



Projected Arsenic Isopleth (Off-Site)





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.

OSWG-10

As, Total = 0.010 mg

As, Disclored = 40.0

Total Solder = 1.210

COVINGTON & ASSOCIATES CORPORATION

PASS CHRISTIAN, MISSISSIPPI

Former Gulfport Fertillzer Site Gulfport, MS

Off-Site Groundwater Borings

DATE Nov. 11, 2004 PROJECT NO. 9397

CALE As Shown FILE C./CAC/GULFPORT FERTILIZER SITE/GROUNDWATER

FIG. 1

ANALYTICAL REPORTS

AND

CHAIN-OF-CUSTODY FORM



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

Date Received :

October 22, 2004

ESC Sample # : L174751-01

Description

Gulfport Fertilizer GW

Sample ID

OSGW-1

Site ID :

Collected By Collection Date :

Lars Larson 10/20/04 10:05 Project # :

9397

Parameter	Result	Det. Limit	Units	Method	D =4	
Total Solids					Date	Dil.
Arsenic	2210	1.00	mg/l	160.3	10/27/04	1
Arsenic, Dissolved	0.10 0.028	0.010 0.010	mg/l mg/l	6010B 6010B	10/28/04 10/29/04	1

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 Gulfport Fertilizer GW ESC Sample # : L174751-04

Description :

Site ID :

Sample ID

OSGW-2

Collected By Collection Date :

Lars Larson 10/20/04 14:10 Project # : 9397

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

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

ESC Sample # : L174751-03

Description

Gulfport Fertilizer GW

Sample ID

OSGW-3

Site ID :

Collected By

Lars Larson

Project # : 9397

Collection Date : 10/20/04 13:50

Parameter	Result	Det. Limit	Units	Method			
Total Solids			0200	Mechod	Date	Dil.	
· 	14700	1.00	mg/l	160.3	10/27/04	1	
Arsenic Arsenic,Dissolved	0.20 0.017	0.010 0.010	mg/1 mg/1	6010B 6010B	10/28/04 10/29/04	1	

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

October 30, 2004

Franklin, TN 37064

ESC Sample # : L174751-02

Date Received : Description :

October 22, 2004 Gulfport Fertilizer GW

Sample ID

OSGW-4

Site ID :

Collected By Collection Date :

Lars Larson 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 Arsenic,Dissolved	0.011 BDL	0.010 0.010	mg/1 mg/1	6010B 6010B	10/28/04 10/29/04	1 1

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

October 30, 2004

Franklin, TN 37064

Date Received : Description

October 22, 2004 Gulfport Fertilizer GW ESC Sample # : L174751-07

Site ID :

Sample ID

OSGW-5

Project # : 9397

Collected By Collection Date : Lars Larson

10/21/04 09:45

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

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

ESC Sample # : L174751-09

Date Received : Description

October 22, 2004 Gulfport Fertilizer GW

Sample ID

OSGW-6

Site ID :

Project # :

9397

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

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

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

Note:

AZ -0612, MN - 047-999-395, NY - 11742

Note:

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Tax I.D. 62-0814289

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REPORT OF ANALYSIS

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

October 30, 2004

Date Received Description

October 22, 2004

Gulfport Fertilizer GW

ESC Sample # :

L174751-10

Sample ID

OSGW-7

Site ID :

Project # : 9397

Collected By Collection Date :

Lars Larson 10/21/04 12:10

Parameter Result Det. Limit Units Method Date Dil. Total Solids 583. 1.00 mg/1160.3 10/28/04 Arsenic BDL 0.010 Arsenic, Dissolved mg/16010B 10/28/04 BDL 0.010 1 mg/16010B 10/29/04 1

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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Est. 1970

L174751-06

REPORT OF ANALYSIS

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

Date Received

October 30, 2004

: October 22, 2004

Description : Gulfport Fertilizer GW

Sample ID : OSGW-8

Site ID :

Project # : 9397

ESC Sample # :

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

Parameter Result Det. Limit Units Method Date Dil. Total Solids 762. 1.00 mg/1160.3 10/27/04 1 Arsenic BDL 0.010 mg/16010B 10/28/04 Arsenic, Dissolved BDL 0.010 mg/16010B 10/29/04 1

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

Note:

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Page 6 of 12



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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

Sample ID

OSGW-9

Collected By

Collection Date :

Lars Larson 10/20/04 15:15

Site ID :

Project # : 9397

ESC Sample # : L174751-05

Parameter	Result	Det. Limit	Units	Method	Date	D41
Total Solids					Date	Dil.
10tal bollas	14400	1.00	mg/l	160.3	10/27/04	1
Arsenic Arsenic,Dissolved	0.092 BDL	0.010 0.010	mg/l mg/l	6010B 6010B	10/30/04 10/29/04	1
					• •	_

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

October 30, 2004

Franklin, TN 37064

ESC Sample # : L174751-12

Date Received :

October 22, 2004 Gulfport Fertilizer GW

Description

Site ID :

Sample ID

OSGW-10

Project # : 9397

Collected By Collection Date :

Lars Larson 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 Arsenic,Dissolved	0.010 BDL	0.010 0.010	mg/l mg/l	6010B 6010B	10/28/04 10/29/04	1

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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:

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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

Site ID :

Project # :

ESC Sample # : L174751-11

9397

Date Received

October 22, 2004

Description

Gulfport Fertilizer GW

Sample ID

OSGW-11

Collected By : Collection Date : Lars Larson

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 Arsenic, Dissolved	0.025 BDL	0.010 0.010	mg/1 mg/1	6010B 6010B	10/28/04 10/29/04	1 1	

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

ESC Sample # : L174751-08

Date Received :

October 22, 2004

Description

Gulfport Fertilizer GW

Site ID :

Sample ID

OSGW-12

9397 Project # :

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 Arsenic,Dissolved	BDL BDL	0.010 0.010	mg/1 mg/1	6010B 6010B	10/28/04 10/29/04	1	

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

		Alternate billing information:	information:	¥	lysis/Con	Analysis/Container/Preservative	Chain of Custody	Г
Covingion & Associates	ıtes						Page of	<u> </u>
300 Davis Ave Suite 100 Pass Christian, MS 39571							Prenared hv	
							ENVIRONMENTAL	
Report to: Mr. Lars Larson		Email: lar	larslarson@bellsouth.net				SCIENCE CORP.	
Project Description: Testing for Gulfport Fertilizer Area 2 G	ilizer Area 2 G	City/State Collected	77 4 77 7	s			12065 Lebanon Road Mt. Juliet. TN 37122	
»: (615) 504-1619	Client Project #:	Lab P	Lab Project #		ξC		Phone (800) 767-5859	
12-0117	9397	COV	VASSOC-9397 GW 2				FAX (615) 758-5859	
Collected by (print):	Site/Facility ID#:	P.O.#:						$\overline{}$
Collected by (exprature):	Rush? (Lab MUST Be Notified)	Be Notified)	Date Results Needed	Hlm	HD)		Acctnum: COVASSOC (lab use only))_
J. James	Same Day	200%	10/20/04				Template/Prelogin T13088/ P126365	v
acked on Ice N y	Two Day	50%	Email? No X Yes No.	Cb			Cooler #: /C/ \CS	<u> </u>
Sample ID	Comp/Grah Matrice		2	SDI			Shipped Via: FedEX Ground	
		nden	Date Time				Remarks/Contaminant Sample # (lab only)	<u></u>
	タイトン GW		10/20/04 1005 3	X	X		1120211	
ı	GW		1300 3	X	×		100	Τ
0264-3	MS CW		1350 3	X	X		7 4	T
7-m950	MS GW		14.10 3	1	X X		77	Τ
	MS GW		1515	X	X			T,
0266-8	GW		W 15503	XX	X			Τ.
056W - 5	GW		10/21/04-9:45 3	X	×			_(
21-3950	GW	_	1, 1045 3	X	X			\bigcap
076W -6	W GW		V 1110 3	X	×		80-	
"Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other	VasteWater DW - Drinkin	Water OT - Othe	- To					J
Remarks:						hd	Temp	

Remarks:

	(tab use only)	by .	NCF	
	Condition:		pH Checked:	2
	Samples returned via: UPS Condition:	Bottles Received:	Time:	41.75. P.M
रिसंट 1811८ मंडसंड	Samples returned via:	Temp:	Date:	10/2/64
4548				
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	Received by	Received by	Received for	7
	1502 1502	Time:	Time:	
	10/1/04	/Dates	Date:	
	7			
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Other

Flow

Covington & Associates	ates	Alternate billing information:	information:		Analy	sis/Contair	Analysis/Container/Preservative	Chain of Custody) A dy
300 Davis Ave Suite 100 Pass Christian, MS 39571	0							Prepared by:	
								ENVIRONMENTAL	TAL
Report to: Mr. Lars Larson		Email: larsh	slarson@bellsouth.net	uth.net				SCIENCE CORP	
Description: Testing for Gulfport Fertilizer Area 2 G	rtilizer Area 2 G	City/State Collected	4.04	711	S			12065 Lebanon Road Mt. Juliet, TN 37122	77 61
Phone: (615) 504-1619	Client Project #:	Lab P	Lab Project #					Phone (800) 767-5859	
FAX: (615) 452-0117	9397	COV	VASSOC-9397 GW 2	GW 2				FAX (615) 758-5859	359
Late (as Son	Site/Facility ID#:	P.O.#							
Collected by (signature):	Rush? (Lab MUST	(Lab MUST Be Notified)		seded				Acchum: COVASSOC (lab use only)	ise only)
Support on the support of the suppor	Same Day Next Day Two Day		2× °×	J	ооs 43 тоsz ((THIm		Template/Prelogin T13088/ P126365	26365
V Comple	_	-	<u>8</u>	Yes of Cntrs				Shipped Via: FedEX Ground	P.
Ol aldulac	Comp/Grab Matrix*	Depth	Date	Time				Remarks/Contaminant Sample #	Sample # (lab only)
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1	GW		_	2553	X	×			7:7
\$56W-10	AS A		7	345 3	XX	×			
	GW		•	3	XX	X			
		-							
*Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_	/-WasteWater DW - Drinkir	ig Water OT - Oth	ler				Hd	Temp	
Remarks:							Flow	Other	
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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



DAVID RONALD MUSGROVE, GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

January 23, 2004

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

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.

Penny A. Tolnoton

Project Manager

Tony Russell, Chief

Assessment Remediation Branch

A Kessell

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

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

FILE COPY

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

Joy Phillips, Hancock Bank, w/enclosures CC:



Environmental Engineers and Consultants



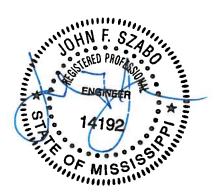
SUPPLEMENTAL OFF-SITE CHARACTERIZATION REPORT

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

Design	Boring	Surface	Dotto	1 2 4			
OS-1			Bottom of Boring	Bottom of Boring Elev.	G.W. BGS	GW	Comments
OS-2		24.03					
OS-3			16	8.58			
OS-4			16	10.19	1		
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OS-7				9.85	2.0		January 22, 100
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	OS-62	20.31	10	10.31	0.5	20.15 19.81	

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

Client: Hancock Bank

Boring	Surface	Bottom of	Bottom of	G.W.	T GW	Commanda
Location	Elev.	Boring	Boring Elev.	BGS	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 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 9	11.69	0.5	20.19	
OS-71	20.78	9	11.78	2.0	18.78	ł
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	l
OS-77	N.R.	4	N.R.	N.R.	N.R.	
OS-78	N.R.	4	N.R.	N.R.	N.R.	ł
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.A. 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



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

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



COVINGTON AND ASSOCIATES CORPORATION

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

December 2, 2003 /Page 2

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



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 Johnston, P.E.

Project Manager

Tony Russell, Chief

Uncontrolled Sites Branch

cc: John F. Szabo, P.E.

Penny A. Johnston

Covington & Associates

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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



Dear Penny:

On behalf of our client, Hancock Bank, Covingtori 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 offsite,
- 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.



COVINGTON AND ASSOCIATES CORPORATION

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

July 29, 2003 /Page 2

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



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 Johnston, P.E.

Project Manager

Tony Russell, Chief Uncontrolled Sites Branch

CC:

John F. Szabo, P.E.

Covington & Associates

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DAVID RONALD MUSGROVE, GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY E COPY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

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.



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

May 6, 2003

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

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 Johnston, P.E.

Project Manager

Tony Russell, Chief Uncontrolled Sites Branch

Russell

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 P. Szabo, P. *Principal*

ENCLOSURES

cc: Ms. Joy Lambert Phillips, Hancock Bank





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 Testing for Gulfport Fertilizer Area 1 Soil

Description

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
рH	4.5		4.5		su	9045C	06/19/02
Total Solids	84.0		84.0		*	2540G	06/25/02
Arsenic Lead	1.8 2.8	0.50 0.25	2.2	0.59 0.30	mg/kg mg/kg	6010B 6010B	06/21/02 06/21/02

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ESC Representative Allen Dunkerley,

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.

This report shall not be reproduced, except in full, without the written approval from ESC. 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 subsurface 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



COVINGTON AND ASSOCIATES CORPORATION

Response to MDEQ Letter dated February 4, 2003

Supplemental Site Characterization Report dated November 8, 2002

Gulfport Fertilizer Site, Gulfport, Mississippi

April 7, 2003 /Page 2

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.
- 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

	Lead (mg/kg)	Soil Sample Interval (ft.)	4' 4'-6' 6'-8' > 8'		6	2							3.8 (20'-24')	5	0					71			11 (24'-28')				-	. 31		1 420 21										
	7		TCLP, 0'-2' 2'-4'	N.A.	1.9	3.2	28	6.3	3.9	56	4.5	19	9.1	30/15	160	36	23		85 39	260	360	12	21	8.	35 16	100	8.9	N.A.	+	62 450	23	31	46	9	5.4	110	18	13	3.2	
J		+		39	41	6.2	400/270	300	720	27/20	17	Ц	_	830	790	1400	220	909	00/1	7200	2200	-		3100	2800	1300	32	160	100	20000	1000	08/06/	300	280	27	3800	570	2000	49	
	28		16'-20' > 20'			1						1.7	11 (20'-24")										12 (24'-28'				1			+	+	-	+		+					
		ŀ	12-16								-	+	2.9		1	+	1	1			9.				1	100	100/	1	+					-	1			-		
	mg/kg)	11CT VAI (TL.)	21-8		1		T.	4.0				10	9.4			Ī	I	1	ļ	1	2	1		4.3	1				+44		2.5					*:		<0.62		
A Simony	-1-	30111010	9-0		-	190	1	+			+	1	365	+	+	-		90.0	ł	7.7	+		+	0.0	70.64	+	29	+	333	H	3.2	43	0.63			+		777	-	
		-		24	16	700 230/190	t	+	200	0.00	+	2 2	+	ļ	+	24 2.4		+	-	-	+	200	28/68	+	7.7 9.6	+	+	F	+	+	8.3 20	-	120 67	F	56	+	90	+	2.74 4.	
		TCLP, 0'-2'	1		1				1		1				-		ľ	<0.050	H			+	<0.050	+	+				<0.050							-				
		02.	0.85	2.8	1/1	170/230	8	99	32/20	<u>.</u>	9.6	07-	52	32	£\$	43	39	12	85	28	25	11/10	300	47	27	95	22	35	110	31	110/130	200	27	1.4	110	-	590	3.7	3.5	
Sample	Location		P1N23	PN30.1	31N29.1	P1N20	311119.1	P1N21	N18.1	P1N18	F1N19	RC10.1	RC9.1	P1RC18	RC7.1	P1S14	T450.1N	P1S15	P1S16	T550.1N	T5.1	P151f	S18.1	P1S12	P1S13	S16.1	31S15.1	P1S17	P1S8	T450.1E	T4100.1E	P1S9	P1S10	S4C.1	P1S6	P1S7	\$50.1	P1S3	P154	

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	Arsenio	c (mg/kg)	Lead (mg/kg) Soil Sample Interval (ft.)					
Location		e 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	7.5				
	4.3	0.69	11	2.2				

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1726 Wooddale Court . Baton Rouge, Louisians 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'B, 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 Ra-228 Pb-210	11.28 0.60 6.13	0.88 0.09 0.74	pCl/gm pCi/gm pCl/gm	0.417 0.022 0.227	0.033 0.003 0.027	Bq/gm Bq/gm	EPA 901.1M EPA 901.1M EPA 901.1M	05/10/01 08:21 05/10/01 08:21 05/10/01 08:21	rb rb
Total Activity	41.17	N/A	pCi/gm	1.523	N/A	Bq/gm	EPA 901.1M	Q5/10/01 Q8:21	ф
			FII	LE C	OPY		D E G	8 2003 EQ-OPC	

Notes: Gulfport Fertilizer



Notes: American Radiation Services, Inc. assumes no finbility for the use or interpretation of any analytical results provided other than the cost of the performed analysis itself. Reproduction of this report in less than full requires the written consent of the client.



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

April 21, 2003

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

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,

fanny 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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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 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 offsite 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



COVINGTON AND ASSOCIATES CORPORATION

Additional Soil Borings – Off-Site Area Former Gulfport Fertilizer Plant Site, 33rd Street, Gulfport, Mississippi

April 7, 2003 /Page 2

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.

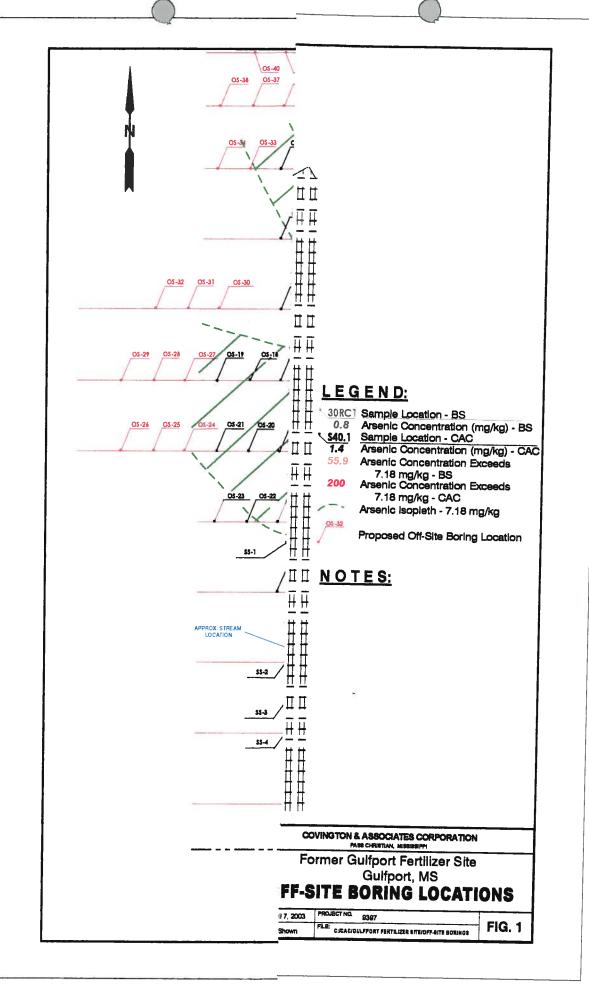
Very truly yours,

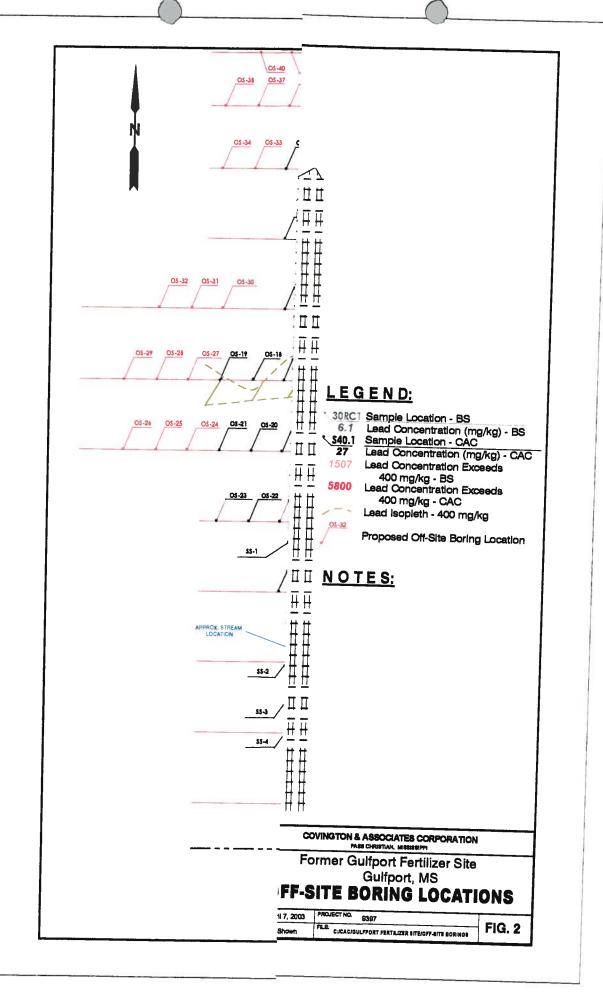
John F. Szapo, P.E.

Principal

ENCLOSURES

cc: Joy Phillips, Hancock Bank/Enclosures







STATE OF MISSISSIPPI

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

February 4, 2003

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

Re: Gulf

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.
- 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.

Ms. Joy Lambert Phimps February 4, 2003 Page 3

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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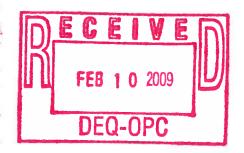
PERFORMANCE MONITORING REPORT

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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COVINGTON CIVIL & ENVIRONMENTAL, LLC

_Civil & Environmental Engineers and Consultants

APPENDICES

Appendix A Site Figures **Analytical Summary Tables** Appendix B Appendix B.1 **Excavation Confirmation Samples** Soil Stockpile Samples Appendix B.2 Air Quality Samples Appendix B.3 Site Photographs Appendix C Appendix D **Analytical Report Sheets** Landfill Disposal Talley Sheets Appendix E Appendix F Chain of Custody Sheets Appendix G Waste Analysis Plan

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 μg/m³ for Arsenic (As) and 30 μg/m³ for Lead (Pb) on a time-

weighted average. The analytical results for both area and personnel air sampling of the

Performance Monitoring Report
Former Gulfport Fertilizer Site, Gulfport, Mississippi

2

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

3

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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 yds³) 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'

Performance Monitoring Report
Former Gulfport Fertilizer Site, Gulfport, Mississippi

with the previous plastic sheet and secured with spray adhesive. The native surface soil within the soil stockpile area was sampled and analyzed <u>before</u> laying down the plastic sheeting and <u>before</u> 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 yds³ 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

5

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.

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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-

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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

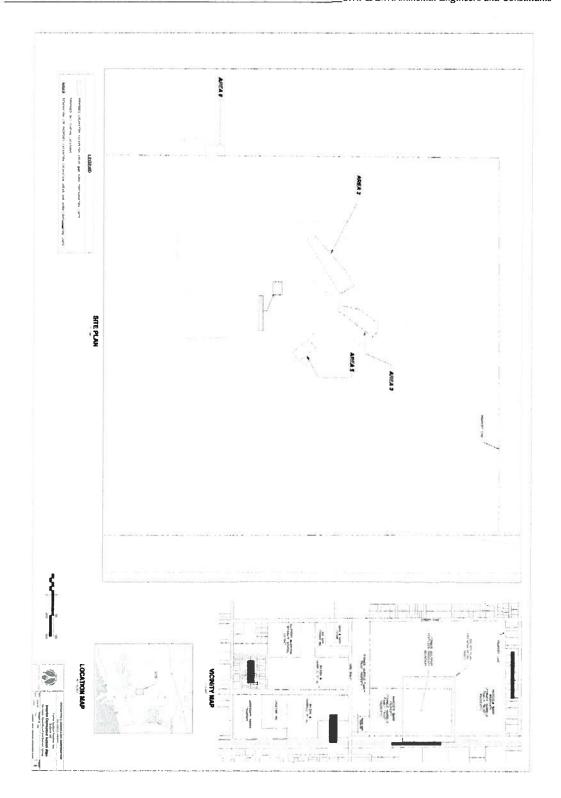
The previously identified excavated areas were backfilled with clean, off-site soils. The backfill was placed in twelve-inch (12") layers in the excavated areas and were compacted with the hydraulic excavator to an approximate density of adjacent, unexcavated soil. The excavated areas were also graded 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

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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.

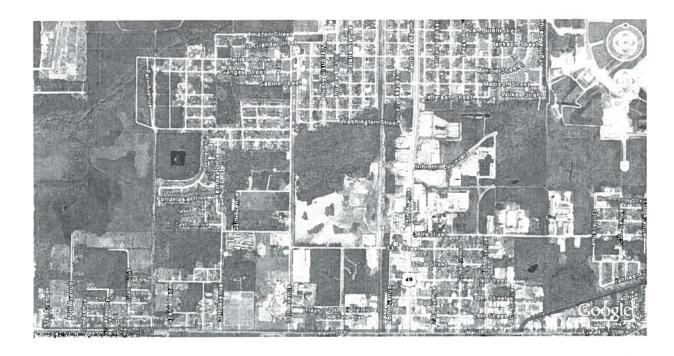
4.0 SUMMARY

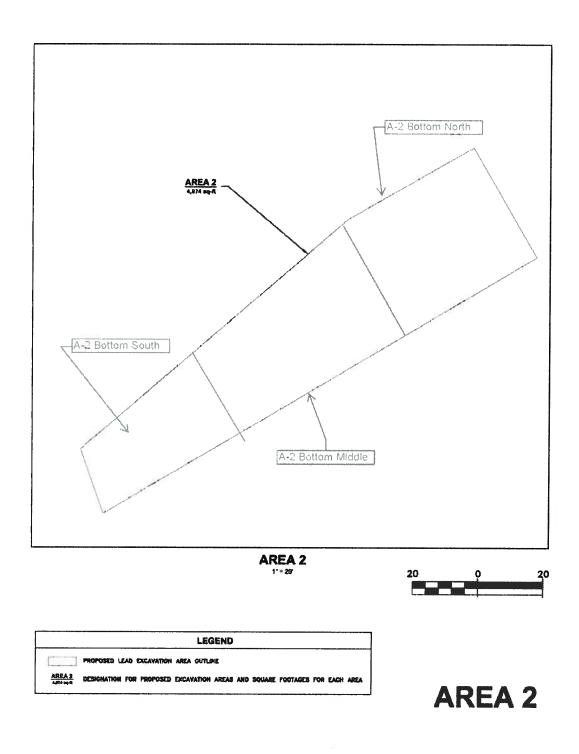
The site activities conducted at the former Gulfport Fertilizer property followed the requirements presented in Section 7.0 (Performance Monitoring Plan) of the MDEQ approved ICAP. A total of five (5) areas were identified as requiring excavation and disposal of lead containing soils. Approximately 1,100 yds3 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 yds³ 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.

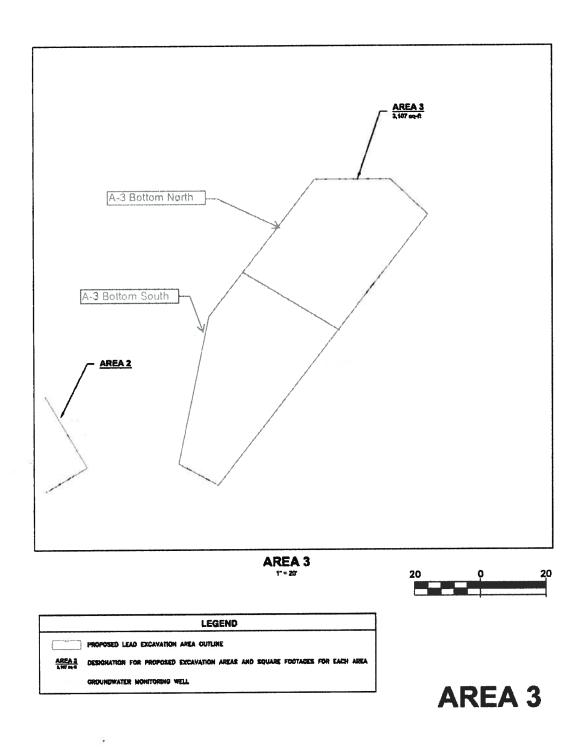


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APPENDIX B ANALYTICAL SUMMARY TABLES

APPENDIX B.1 EXCAVATION CONFIRMATION SAMPLES

LFPORT FERTILIZ	ZER
NCE MONITORING	ACTIVITIES
APEAS & ANALYTIC	AL SLIMMARY SHEET
HACAS & AMALITIO	AL SUMMART SHEET
	Limit-3,800 mg/kg total Lead
Total Lead (mg/kg)	Comments
2,700	Pass
90	Pass
22,000	Fail
Total Lead (mg/kg)	Comments
	Pass
Total Land (marks)	Commonte
	Pass Comments
	Pass
170	Pass
660	Pass
600	Pass
77	Pass
660	Pass
30	Pass
֡	NEE MONITORING

	LFPORT FERTILL	
PERFORMA	NCE MONITORING	SACTIVITIES
LEAD EXCAVATION	AREAS & ANALYTIC	AL SUMMARY SHEET
Lead Excavation Area # 3		
		Limit-3,800 mg/kg Total Lead
ottom 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	5.8	Pass
SW-2 (A) SOUTH	140	Pass
SW-3 (A) EAST	190	Pass
SW-4 (A) WEST	210	Pass
Taxas		
-1000000 = 527.00 = 10000000		

PERFORMAN	ICE MONITORING	ACTIVITIES
LEAD EXCAVATION AREAS	& ANALYTICAL TES	TING FIELD TRACKING LOG
Lead Excavation Area # 5		
	iza especificaren il assimplyes L	Limit-3,809 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

	LEPORT FERTILIZATION OF MONITORING	the state of the s
LEAD EXCAVATION	AREAS & ANALYTIC	AL 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	

JEFPORT FERTIL	ZER
NCE MONITORIN	G ACTIVITIES
AREAS & ANALYTIC	CAL SUMMARY SHEET
	- Committee of the Comm
	Limit-3,800 mg/kg Total Lead
Total Lead (mg/kg)	Comments
200	Pass
Total Lead (mg/kg)	Comments
420	Pass
1,500	Pass
1,400	Pass
37	Pass
	Total Lead (mg/kg) 200 Total Lead (mg/kg) 420 1,500 1,400

APPENDIX B.2 SOIL STOCKPILE SAMPLES

		FPORT FERTILIZE	
A. 对于"自己"。	PERFORMAN	CE MONITORING	ACTIVITIES
	EXCAV	ATION SOIL STOCKP	ILES
		<u> </u>	
Before Treatment			8:
Soil Stockpile#	Sample Date	TCLP Lead (mg/L)	Comments
1 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-TOLP 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

		PORT FERTI			
	PERFORMAN	CE MONITORI	NG ACTVITIES		
AIR SAMPLING					
AR	SENIC	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		
!		I I	11		

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.



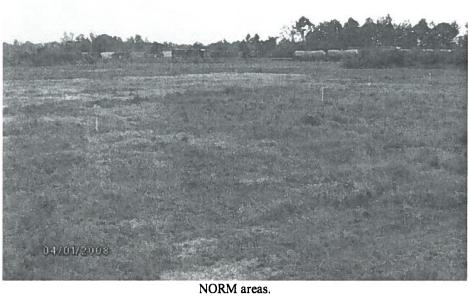
Areas #2 and #3 identified with stakes. Photo taken towards the north.



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



Representative photo of excavation of identified areas.

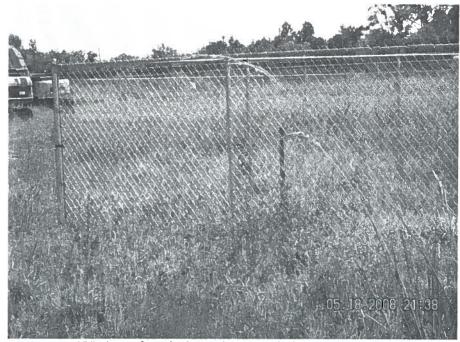




NORM area fenced. Photo taken towards the north.



NORM area fenced. Photo taken towards the north.



NORM area fenced. Photo taken towards the north northwest.





Soil stockpile area. Photo taken towards the north northeast.



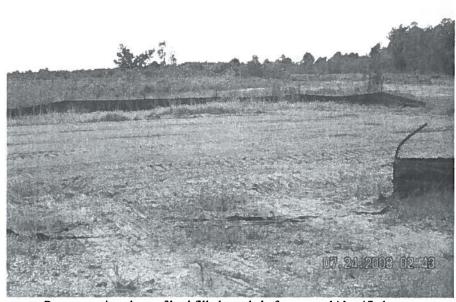
Same as previous photograph



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)



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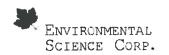
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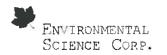
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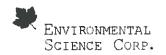
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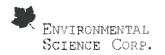
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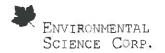
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REPORT OF AMALYSIS

Mr. Tony Damisho Cosmotou & Accoluter 1636 Fispe Ferry Mod. Guite Mo Bilent, MC 00532

E25 Jampie # 1 1/4/7/62-09

Project # 5 1559

Date backword f May 77, 2009 Inscription 1 Sulport Vertalises Sample 1D : AL-CHD FASS STREET S

Collection Date 1 - My 29/08 Dorder

+ 57. 5.19 merks 60108 05731/05 7.7

Wig. - Newton Detection Limit
Eid - Detection Limit Estimated Qualification LimitsBOLD
Retor
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This report shall not be reproduced, except in full, without the shiften approval from EEC.
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BEST 1970

REPORT OF AMALYSIS

Mr. Tony Township Covington's Accounter 1875 Prope Penry Road, Swite Mi Ethony, Mg 75-85.

100 Dampie * : 134792 W

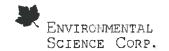
Case Description : May 376 2008 Description : Sulfact Festilizer Dample 10 : AD 2000 PASS SIGKAL N

Exhaust # 1 1007

546 5.29 markar 80106 5131254

BOL - Avior Debetton Limit REL - Pointerion Limit Extraction Limit (EQL) Relation Limit (EQL) Relation Limit Extraction Limit (EQL) Relation Limit (EQL) Rel

2 mge / 85 30



fam 1.0. 62-0814299

EREA 1930

NEPORT OF AMALYPIE

Mr. Tray Demiano Covington 5 Aproviates 1934 Prins Perry Faudi Suite MF Filoni, NF 75525

EDC Jample * : 2017762 07

Date Received : Star 30. 2008 Decomprise : Sulpost Pertilizer Sumple ID : AI-IND DAIS STRWL W

2156 22 1 NWT Project # : 55%

Collection Date: 56/2/000 00:00

Total policis 48.5 0.15 marky 60006 0000100

Fig. - Below Petertion limit
EDE - Derection tabule Estimated Quantization Lamanisque
Note:
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This report shall not be represented, except in full, without the written approval from ESC.
Reported: 06/03/08 00:03 Printed: CesusOB DetS

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AREA 3 CLEARANCE SAMPLES (LIMITS OF EXCAVATION)



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1230 Letymon Rd. Mt. Jailet. 70 19222 1215: 750-565: 1 100-767-7650 East 0013: 755-7650

Tan 1.0. 02-0614239

Let. 1970

REPORT OF AMALYSIS

Mr. Tony Damiano Councida S Arconates 1938 Penes Perty Road, Puite Mi eviet, Mr. 1892 May It, and

for despite * : Leidenberg

Date Referred | May 12, 2008 | Parity of the Saling of Test Saling of Test Saling | Saling of Test Saling of Test Saling | Saling of Test Saling of Te

9250 10 1 9297 FEO3-01 W 1 9297

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FOR - Poles Detection first:

ECG - Detection first- Estimated Quantifation Limit(EQL)

Note:

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Reported: UNCLOSUS 1915 Frant-St 05/20/09 1214;

Farm Took



Idea Labarda E.J. Mr. dallet, TO 1715 1615: Parkasi 1 100 parkasi Eye 1011: Usanbasa

7.04 1.24 05 06 14 255

521. 1970

EXPOST OF ANALYSIS

May 27, 27-0

Mr. Tony Demisso Coveration 5 Accounter 1939 Prope Perry Monda, Suite MS

\$25 Jumply # : 5144 927 94

Date Described | May | 25, 2008 | Description | Delignet Entilled | ARREST DESCRIPTION | ARREST DESCRIPTION | DESC

Este 20 t 9797 Project # 1 2097

Collected by : Anthony Demised Collection Date: 000177000 [5:10]

Bin. - Belyw Detection Limit Bin. - Telection Limit Estimated Quantitation Lamit (EQL) Hoter The apported analytical results relate order in the cample autorited. This report chall not be reservinged, except in full without the written approval from ESC. Reported: 15.75/00 [171] Printed: 75/70/01 [274]

Page 1 of



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REPORT OF AMALYDIS

May 24, 2000

Htt. Pour Camilabe Covandton & Accountage 1836 Paper Febru Wood, Surth MS States, ME 1882

Date Received : May 2% 208 Perception : Sulfport Perculater Rampi- 2D : ARRA & STITCH NORTH 1.77 Comple # 1 (2)dam20-02

Esta 10 : 4290 Parter # : 4047

Obligation have i Systemic Parks
Farameter W.bayoli SSL O.Sessia

FCE - Felck Totachine time:
FCE - Telestion limits Estimated Quantitation Limit EQL:
Scie;
The reported analytical results relate only to the comple submitted.
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Correspond & Accommunes 1806 Puppa Ferry Youth Suite MS

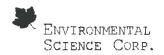
E00 Comple * 1 L947 Sid-05

Collected by .: Anthony Canada Collection Date : 90022008 10405

istabeter	7,549.11		2,768.003			384.004	2000
Total Solids	46.5		46.3			15400	200724(06
Lead	5.19	10.24		5.34	293 743	miles.	05/27/4/18

55% - Pripe Detection Limit EDG - Detection limits Equipped (Quantitation Limit) SQL: Note: The reported analytical results points only no the compleximization. This tepest shall not be rescaled, except in their exchange the written approval from EXC. Reported: whileful limit Printed (Crimes 1944).

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Est. 1970

REPORT OF ANALYSIS

Mr. Tony Camiano Communio & Accoming 1920 Pope Forry Road, curte ME biles, RC 19812

May 27,2906

ESC Comple # 1 Lawrence

Date Received : May 13, 2008
Permiptish : Surport Permilings
Pemple IP : AREA : ITEMALL EAST
Collected By : Anthony Deministration Date : 18,725000 1816

Project # 1 F357

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Edd - Detection Limit Estimated Estimate Distribution Limit Edd)
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May 25, 2008 Smitport Ferrilizer Completion of ARRA CONTRACT WEST

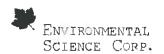
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Collected by Anthony Jan. and Collected Date (Collected Date)

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AREA 5 CLEARANCE SAMPLES (LIMITS OF EXCAVATION)



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EDS Comple # 1 1347671 04

Data Released : May EL 2008 December : Oultpost Pertilizes Cample ID : APRAGE E. 2008 WALL

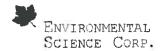
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Angert was 1996

Collected By : Aditiony 1988 and Collection Date : 0,21198 24149

estable to p	W. PAMILE	125 <u> </u>	Wallesson"	WE4	Ille C *im	Method	2,459
Total Solids	16.2		(147, 1)			25410	
22/97608	569	V. 35	0.50	5.74	1001-340	401/5	

Fig. - Bolow Detection Limit Fig. - February Stronger Quantitation Supplies 1 Section Limit - Settomated Quantitation Supplies 2. Section 1 Sectio



The water valentifiers

Edt. 1979

REPORT OF ANALYSIS

May Department

He. Tony Caminio Cognition & Arrogistes 1938 Forms Fighty Road, Busto MS Filton, Mg. 20022

EGC Jumple * : 134-301-01

Date Received : Mar DL 2008 Interpretary : Gulfphet Fernilizer People 70 : ARRA = BOYTON EX IFT

7110 ID : 9797

Collected by : Collection Date : Suthbody Demonstrate 14:10 Project # 1 1007

toral School 4 56.1 7,09 my/Ad +0106 05/01/08

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\$600 - Reflection limit Extinated Quantitation Limit(SQL)
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7 mg 1.2. 92-98142/9

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REPORT OF AMALYSIS

May Develop

Coveration 5 Accordance 1939 Despo Ferry Hond, Suite Mi

EST Cample : 1 134-671 03

Date Recoived : May 55, 300% Decreption : Quirost Decision

Fire Dr. 1 1997

Collected By : Authory Daniel Collection Date : McClone 14:40

(H) a Roll w Estantion limit (E) a Detection Limit Estimated Quantitation Lemin(EDL) Liet to exported analysical fearly a relate only to the sample substited. But reports that not be reproduced except in fully without the written approval from ESC. Reported Chalorde Limit Pillited (A/Laron 1810).

Fage 4 of 15



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PERSENT OF AMALYSIS

May By Son

Date Received : May 31. 2004 Contription : Gulfport Pestalises

DOS DASSIGN # 1 10444071-00

ARRAS D. SIDE WALL Sample III - *

Fite ID : 9547 Decision and Soft

Asthony Damies 70,711 on 14176

total Jolean 14.0 1545G 75/19/09 0.20 Ma/Aq 60108 05/15/09 13170 101708

FTE - Edico Detection Diest FTE - Detection Limit- Estimated quantitation Limit Egis Note: The reported analytical results relate only to the complementate. This report shall not be reproduced, except th full Sithout the written approval from ESC. Reported: 00736700 leton Frinted: 0578700 leton



familia or bridge

201. 1977

KINDLE ANALYSIS

Mag drypoots

Date Deceived | May 15, 2008 Decempts | i Fullport Percliser Cample 15 | r APEA : W. 1978 WALL

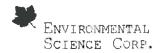
11.0° 2.09 10 * 1 1.144-22 - 05

Project # 1 (2007)

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tyried.		0.25		0.23	too kg		

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AREA 8 CLEARANCE SAMPLES (LIMITS OF EXCAVATION)



Tests 1900

PEROST OF AMALYSIS

1187 24, 2000

707 Jung to # 1 1/44471-00

Date Receiosa : May 12, 2008 Description : Gulfport Pertulater Jumple 12 . AFRA 8 DOUGH WALL

Project K. t. 1995

Collector By 1 Anthony Lemman Collector Date 1 (Collector 11:0)

14.7 54. 6.50 perks 80106 05759765

Note: The reported analytical results relate unit to the comple remarked: This report shall not be repositived, except in full, without the kritten approval from ESC, Reported: Ch700700 18108 FrintesE off/E8700 18109



Tax 1.02 00:00:14089 prt. 1970

REPORT OF ANALYSIS

Mr. Tony Tourniano Covington & Associator 1854 Tours Ferry Road, cuite ME Euleri, ME 1871

NTC Sample * 1 1.049-71-07

Date Exceived : May ID, 2008 Passerption : Galipost Pertilizes Jumple 10 : ARKA A WEST WALL

Trospet was 1504

Tollected by : Anthony Date on the Collection Date : 15571708 15597

Extracetes	W. Feel T	3.01	D.Result	100	12232	Meshed	
Total Silish	85.7		85.9		(7)	37.4	
	5.3	5.25	12.	4.29	100/34	634.55	07/23/03

FCL - Bolow Detection Limit Filt Setumated Quantitation Limit(FQL) Recention Limit Factor Quantitation Limit(FQL) Recent For Setumated S



Direct Separation Resident Control of the Property of the Prop

THE ARTS OF MISSES

art. 1411

NETOET OF AMALYSIS

Street Magazinia

No. Tany Lamiang Covington & Accountage 1000 Party Farry Road, Swite MS Lamana, Mg Salas

100 Copple # 1 1944471-04

Description i Gulfper Ferniller
Complete Co. . AREA - COTTON EX

Project # 1 1997

Collected By : Anthony Caption Collected Date : Collect Collect

Fig. - Sel.s Detection limit
Fig. - Detection limits Estimated Countriation Limit(Fig.)
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E.S. Complete # 1 1.144-71 004

Partiett wit 1997

Cample 15 : AREA & M.E78 WALL

Tomal Molets . 45, 5,11 59/10 40106 60002208

Wit - Follow Detection Limit Fig. - Perection Limit. Estimated goest postion Limit (Egg.) Sector: The reported analytical results relate only to the comple submitted. This tep-it shall not be reproduced, except in tail, without the written approval from ESC. Reported: 50.0000 18100 Erinted: 50.0000 18100

AREA P1S8 CLEARANCE SAMPLES (LIMITS OF EXCAVATION)



Table 52 W1400

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REPORT OF ANALYSISS

Ms. Tody Damiano Overation 5 Architecture 1878 Person Terry Louis Suite MS Friedly Ms 4-72

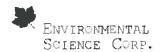
ESC Cample * 1 1988011 00

Date Received : June 03, 2008 Lacomption : Gulfrost Pertulizer

Project # 1

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Person S of H



RESE 1989

REPORT OF ABALYSIS

Mr. They Parland Townston & Associates 1808 Props Parly Frail Furth 95 Science, 181 1913

Date Deceived . Table U.S. 2008 Description : multiplet fertilizer Completio : ALEA give stoomst Nighth

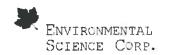
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Fire II a STATE Drogner was

Supa of the

1407 5.25 ms/kg 40106 64/03/05

874. - Briggs Peterston, Liedt Erg. - Debecton Liett - Schremsted Zumntstation Lamit (828) Rober The reported analytical results relate only in the simple submitted, Final report shall not be represented, except in full, without the sinteen approval from ESC. Reported: Printegr Modeled 1450.



Tax acco greaters.

REPORT OF AMALYSIS

No. Tody Cartano Covandou & Arcociases 1806 Super Perry Atal, ouite ME 811081, NO. 18528

FRC Cample *: 1248031-02

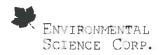
Date Restricted | June 05, 2008 Perinaption | Delignet Perilaner Comple ID | AMER PLPS STREAM COURT

Exosent a r

Collected By : Tony Dumiano Collection Date : 06/00/08 00:05

Fig. Cost of	a,repult	83%	D.Besult	124	175.19	265552	2414
fota, bliefs	13.7					20610	06-04/25
Local A			2550	4.14	299, 3,9	67.17.2	34701755

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Sat. 1910

ESC Sumple # 0 1249211-07

Date Largered to June 33, 2,09 Decruption to Sulfport Perfoliser Completion to AREA East COMMAND NEWS

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Trops 4 of 30



Jan 111. 02-0814409

ERC - 1970

REPORT OF ANALYSIS

ffr, fony Damieto Covinstia & Associates 1816 Pepsa Ferry Road, cuite MS Estemny MS 20012

for Jample * : Life 11-06

Date Decrived 1 June 20, 2008 Description 1 Gullpost Perioditer Supply 10 : ARRA Fibr BOTTOM

Resport # 1

Tollected by 1 Tony Junior (Collected Date 1 08/00/08 0000)

Professor	W.Keedit	1.01	D.Peyult	FEG	United	Method.	DASH
ictor Saleda	Art . A		dh.4			27400	10/12/15
Lead	47.6	1,25	200	0.09	pep a log	63278	26,732,65

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SOIL STOCKPILES NO TREATMENT REQUIRED STOCKPILES 1, 2 AND 9



12004 Setupot Ro. Mr. Alliet TN 99101 (015) TOU-Sabr Louis NY 4000 Ear oils) Parkery

Tue 4.0, 02-0/14cm

Est. 1970

BESTST OF AMALYSIS

Mr. Play Camings Covered on V Accountes Line Cope Persy No.4, suite Mi micros. MC 19632 Time (15, 100%)

E27 Carp 14 4 1 11/88149-01

Date Received : Jose 62, 2008 Londriptich : Oblipert Festilizes

\$100 TD 1 9197

Cample ID : 2707EVILE 9

Records t

Collected By 1 Collected Date : 05079708 Union

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TELE EXPLASIVOLE

- 1011 04/04/05 0540 ARE 1

Lean 0.94 0.050 44/1 0.0 40105 04/04/05 2107 1004 0

Son - Melow Detects in Limit Described: - Estimated Quantitation limit.EQL) Limit - Minimum Contaminant level of established by the US EFA Under The reported analytical results telate only to the rample wheatter. This report shall not be reproduced, except in full, without the efficient approval trom ECW. - exported: On throw object Perinted: On/object Outlier

Dage 2 of C



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HERCES OF AMALYSIS

(c. 7 by Damine.) Desiring V Associates First Press Flack Fusion ID Stocks, NO 19812

May 30, 2009 Sultport Vertilion

Fr. 1975 # 19797

: SSTA STOCKPILE I

Collection Local to Cdc 297 09 00; of

05/31/06 0912 ABN 2 0.050 mill 5.0 0050b NG-0708-0005-060-1 . . .

ACK - Felow Detection complete contribution and Park Section 19 Section 1 - Maximum Contraction and Park Section 19 Section 1 - Maximum Contraction to established by the UP KPA Section 2 - Park Section 1 - Park reported nervalua until Printeds unfolken nerva

Environmental Science Corp.

12066 tehnics Eas Mt. Adlant, TN 8612. Mt.S. The Case 1 apr. Toyon 864

fax 4.0. 00-0/14219

Date 1970

REPORT OF ANALYSIS

Mr. Tray Damian: C.Vinst.to & Associates 175: Trope Percy Boad, suste H5 extext, MS 794.2

June 5h, how

Est Sumple • 1 LS47543-67

Date Received | May 20, 1008 | Description | Outpost Fertilines | Dept. 2008 | Dept

Fire 10 : 1697 France : 1697

Collected By : Chilecter Date : Objected Notes

BCL of Select Detection Limit
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Limit - Estimates Contaminant Level as established by the Cf FFA
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SOIL STOCKPILES

3,4,5,6,7,8 AND 10

UNTREATED AND REQUIRING TREATMENT



Cook Labynos ka. Mr. shillet, TV vijos 1615 - 164-1655 1716 - 1611 - Marchall

Tax ... 01:02:15//

125. 1970

SEPTET OF ANALYSIS

Mr. Cony Camp pos Covenatos & Associates 1856 Poppa Perry Road, custo Mb May 17, same

ESC Comple * 2 1,740ACH467

2000 20 1 3099

Date Perceived : 10y 2% 2008 Description : Unitpost Festilises Sept-10 : STOCKPILE %

Collected By : Anthony Parkano Collection Date : Gb/22/08 [#120

Fig. - Asian Detection limit

Det. inst - Asianated guaritation Limitizing

Limit - Minimum Continuations Sever as estimationed by the OS ELA

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Pare 7 of 2



12000 Lebunon Kir. Mt. Scilet. TN 19122 10121 168-158-1-100-167-168-5 Vac 1833 168-58-6

Tax 1.1. No Distance

Esta VIII

TERMAT OF AMALYZIS

Covandon & Accounter 1504 Page Fuery Foods cuite MiMay 21, 24th

Nic Excelved : Mar. 13, 2008 Schimpliffs : Galtpar', Festilines

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Anthony tempana

eds. - Ael or fetection limit

Septiment - Estimated Commission Limit(EQL)

Limit - Maximum Funtaminant Level as established by the MS ETA

Note:
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132 124 02-9814299

Ent. 1975

REPORT OF ANALYSIS

Mr. Tony Daminson Colegaria & Associates 1936 Pape Ferry Scale costs No 910001, Mc (681)

Street Industrial

Filt Purple # 1 - Little Seed

Date Reserved : May 27, 2568 Description : Gultport Perulines

0.000 000

Season C. A.

Faraneter - Regult Dec. 50568 Forth Sight Method Date/Fine BV Dil Toth Spinetson = 1011 U5/24/08 EV48 EV5 2 5444 110 (.050 bull 5.0 6/268 55/26/08 5044 898 2

PDL - Relaw Defects in Limit
Cot. Limit - Retimates Conductivation LimitiEqual
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Table 440 4 (10) 000 (42) (10)

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REPORT OF AMALYSTS

Mr. F by Damians Transport Accounter 150 Paper Formy E. ad. Just Mb Wight, Mr. (622 Mayor 1997 SHOW

Ecc 2441/4 (1744/04-6)

ate Received : May 73, 7008 conseptant : Olipant Fertiliza

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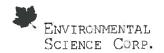
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Anthony Parisher Character 2:15

7520 Extraction 7 5011 05/14/00 DARK 1 5211 05/14/00 DARK 1 5211 05/14/00 DARK 1

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1,066 Limpus ki. Th. Adlet. TO 4022 (11) Teachers (12) Teachers (12) Teachers

lax 0: 00:14:19

DRIA 1975

MERCIT OF AMALGOIS

Nr. Tony Dari un Trinaton 5 Associates 1056 Page Frey Ford, sorte Mi wilden, 92 Nr.2 May 17,1000

EDS Sheple + 5 - Endealment

Date Received : May 25; 2008 Description : Gulfport Fertilizer Cample CO : SINCEPIE 6

Size 20 : -187

Stolect :

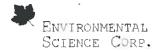
Collected by : Anthony Destand Collected Date : (6.25.08.1510)

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TERMS LABORED BU. Mr. Colons, TM 1777-1 10741 TSHRTES - BURGAL THESE

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EPOLT OF AMALYSIS

Mr. Topy Carnau. Communica & Arrogiates 1606 Pospa Percy Poud, Juste Mi et Lest, MC 19622

Make Implement

Fire August + 1 1947-1948

Date Foreign : Hay DJ, Dune Decreption : Alignet Pertiling

Notes 14 a 1997

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Collected By : Anthony Deplace Collection Date : Objection Collect

Hit. - Fermi Detection Limit
Not. Limit - Estimated Constitution Contribut;
Limit - Hammon Contaminant Lovel a cotal Limit by the MF FER
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The reported analytical results relate only to the Respire admitted, approved from REC.
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These reports that First Annual Recommendations of the REC.

FAUR FOR

SOIL STOCKPILES

TREATED

STOCKPILES 3,4,5,6,7,8 AND 10



1000 Letunos kil Mr. Juliet, III silli 1015 1000 NOS Taxografia Nosye

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REPORT OF AMALOGIA

Mr. Stoy Daby and Cyvington & Azooccated 1714 Poppa Parmy Hoad, courte Mb 612-081, 707 (1913) 2017-227-2001

Nate received to only 13, 2008 Description to college Festilions \$20 Supply # 1 | 1.055-9-15

Leadingstin : Unitpost Feat. Langle III : TP-8

Protect 1

Collected By 1 Tollective Date 1 01/17/08 148/0

apt. - Below (election limit
lets limit + Astronomic Countritation limit(E)
limit - Baxicom Contemnant Level is established by the MS EPA
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The reported analytical versits relate only to the semple valuable D
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REPORT OF AMALIGNE

Mr. Anthony Communic Collector & Accountry 1.7. Box 681821 Franklin, 78 37664 here To Stock

Date Reserved : Duly 34, 2008 Description : Duly 34, 2008 SEC CAMPLE # 1 LONGSCHOOL

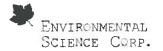
Description : Gelfport Fertilla Cample III : TERATED EILE 4

5110 10 : 4147 France: • 4147

Collected by : Folk W Collection Date : 07/23/08 15:20

BOL - Melow between Arms Park Limit - Forthward Constraint in the Profit Limit - Forthward Constraint bevel as established by the US FFA Notes.
The reported analytical incults relate only to the cample substitut.
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Reported: 07/30/00 ddtt2 brinted: 07/10/00 14:16

Page 7 61



factor desired

E71. .970

REPORT OF ASSAULTED

Mr. Tony Parisms Covanation & Associated 1608 Ports Porcy Hous, 11118 Mb econs, Mo 1802

Stely Ny.2568

Date Received : Dely D5, 2006 Description : Deliper Pertiling

EEC Cample * : Louissen ol-

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Collected By : But H. Collected thise : 00/04/09 16:30

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The Limit - Betranted Contribution contribut

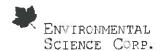
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138 1.1. 03-0534239

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SERVED OF ANALYSIS

Mr. Anthony Parisho Coverston & Approvator 1.2: Box /81861 Franklin, TN /7504

SHARY THOUGH COURT

Date Servived : Taly 28, 2008
Description : Dispose Settlines
Complete : TEATER File :
Conference by : Each H.
Conference : Officerom 11180

edd. - Selve Detection Limit
Deta timet - Astronoca Committation Limitated)
Limit - Minister Contembrat Level as established by the US EFA
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(2005) (Adiaba) 742 Mt., Adiaba, TV 98255 (625) (Mid-6065) (-406) (Adiaba)

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Civington 1 Accessions 1.0. Box 551751 Translin, TM 17164 (2019) US (250)

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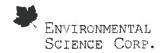
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WELL - Rejoid Detects to Light
New Light - Establish Countestation accordingly
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* Comparted of CHANG LAST France II Counter Coun

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DEFEND OF ANALYSIS

Mr. Tony Damieno Committe & Aveloutes 1932 Popis Ferry Head, Smite Mi-Hilony, Mr. 2002

Coate Sensived : maly 32, 2008 Description : maly Westilings

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Earl Chaple # 1 L000085-01

Este ID: 4197

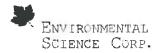
Project 1

Tollected By FARM 1750s 2750s

20031- ID

TOLE Estraction COVERAGE GREAT APR 1 5724526 5-13 1947) 5.0 6010b 07714700 1140 BOR 1 9411 5.0 6010b 07714700 3340 BAR 1 8.17

WHEN A PROBE THEORY I CONTROL OF THE PROPERTY Reported 07/25/28 20114 Printed: 07/25/06 08:14



1221 1270

MERCET OF AMALTOTS

527 P.109

Date Recovered : July C1, 2008 Description : Destport Festilizer

RECORDER * 1 CONTRACT

September 11 TP 1

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act. Though of farmated Quantitation Districted:
Limit - Staines Contamined Level is established by the UT EFA

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ORIGINAL SOIL STOCKPILE AREA SAMPLING OF NATIVE SURFACE SOILS BEFORE AND AFTER USAGE



1000 latanon hiz. Mr. hilant, TN 1013 1015: 701 1050 100 123-1249

The race of Markey

Sec. 1570

HERMAN OF ANALYSIS

Covang on & Arcollates 1004 Popp Folly Foot, crite HS May 119 2008

EDS (1994) 4 F 1946,71-21

note Externed (1507 22, 256) Addition (Althort Postilises

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Timethol By : Anicony Testano Timethol Date : Obj.21/96 (6:0)

PARAMETER PRODUCT AND VALUE AND PRODUCT CONTROL OF THE PRODUCT AND PRODUCT AND

ADE. From Detection time:

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Fuge 12 of 12



Tax 4.2. 02-7/14/47

.at. 1975

REPORT OF AMALYSIS

Mr. Tony Castawa Clematin VAscernates 1022 Port Ferdy Read, 544th MS 521582, PC 58752

May 15, 1000

ARC Chapter # 2 L5000/1-10

May 02, 0568 Geltport Mactalister STOCKSTILE AREA 5 my te In

Tollected By : Tollection Date :

Project 1 1997

HAMAGARAR TOLF Estraction 1351 35/25/06 1045 538 1 5.12 7.50 FORL 500 ROOM 55/10/06 10:50 CE 1 2017

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This report shall not be reproduced, except in rule, without the written approval from EDT.

Fig. 11 of



Albest Leoneses Rai Mr. Julies, TN 19122 10150 The Code 1 1907 The Code San 19101 Theorem

Tap and services

With 1976

REPORT OF AMALYCIS

SHEET BY DOOR

Community & Associates 1.0. Sec 981921 Franklin, SN 9864

ESC 20412 • 3 1307070-12

Oute Received : 3617 IS-2708 Description : Justificat FeatsLister Sequests : Clarky 1898 AREA FART

Excluding 9:47 Excluding 9:49

0114-144 AV 1 FAR B. 0214171 M. Date 1 0177470W (1114)

PRIOR Defects in time:

The limit = Estimated Constitution Limit Fig.;

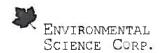
Limit = Harmonic Fortugation Level at established by the UF FPA

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Page 3 of 4



Das aids edemotions

191. 1519

METERY OF ANALYSIS

Mr. Assisting Campains Coveration & Assistator 1.6. For Object Pranklin, IN 15064

Description | July 13, 2006 Description | Unity of Pertilities

REST Charp Lot # 1 129 4 4 16 - 03

: LAS DOWN AREA WEST maple ID

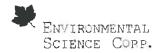
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Collected by 3 collection (whe :

Administra Lexal 7.0

Fig. - Relaw Petertion Limit Lot. Limit - Bracking Assubitation Limit(196) Hilled The Lepvited analytical results relate only to the masple cababilities. This Lepvit chall not be reprediced, except in full, without the written approved from ESC.

Reported: 07/28/00 16:29 Printed: 07/28/08 16:29



12065 Catanion CI. Mr. Juliet, Tu Pli. 1613) Tunileta 1820-267-268

THE 1431 OF 1987 \$120

Bes. 1410

REPORT OF ASSESSED

Mr. Anthony England Organitor & Aprocastes 1.05 has 401011 Franklin, 70 176-4 3010 Mg 2008

BEST CHARLES & 1 1 00 00000-03

Late Roberts : 2017 18, 2008
Description : Colleges Perfilled
Legis IV : CLP LAY DAME ABLE BAST
Except IV : CLP LAY DAME ABLE BAST

Collection (who : 07/26/06 02:45

ers - Rejoid Detection Limit (Section Limit) (Section Constitution Limit) (Section Constitution Limit) (Section Constitution Constituti

Fage 4 of



Tag

pat. 1970

DEPOST OF ANALYSIS

Mr. Asthony Damiano C. Visaton V Associates 114. Res 081821 Franklin, TN 37064

Cample III :

127 Cheple W.E. Lindale and

Date Received : July 13, 2006 Description : Gulfport Pistillines LAT DOWN AFEA WEST

Restert 1 9797

Collected By : Edica. Collected base : Collected District

Pasametes 70% P. Entracta da PATRICE OF MARKIN 1074 5.0 60108 (7:16)06 1538 MF 1 1011 5.0 60108 (7:16)06 (4:15 MF 1

Fig. = Select Petertion Limit
[Pet. Limit = Estimated Understation Limits[Ed]]
Limit = Hadiswin Contaminant Level as woranlished by the UF EPA
[Actes]
The reported analytical results relate only to the rample supplies.
This report shall not be teproduced, except in full, without the written approval from EPC. Reported: 01/2s/00 16:25 Figured: 05/18/00 16:45

TREATMENT SOIL STOCKPILE AREA SAMPLING OF NATIVE SURFACE SOILS BEFORE AND AFTER USAGE



13006 Letacom Roa Mt. Salket, 79 9792, 11151 Timitoda 1150 Timitoda 1150 1151 Timitoda Farr 18151 Timitoda

Tax 1.5. 02-0614399

Art. 1970

REPORT OF ANALYSIS

No. Anthony Dammand Covered & Associates 1.00 Bin 601311 Synceles, TN 576-4

Capturder Day 1009

Date Received : Partenner 17, 2008
Description : Testing for Justicet Securities Stought Water

Sample 18 : NOTE-TE LATIONS EAST FROM 1 (1997)
COLLECTED BY : CP/15/08 (2820)

Wid. Fell W Detection Limit
Took hims o Actimated Constitution Simit (ACL)
Limit - Minimum Constitutions Level or established by the UF FFA

[See 1]
The imported analytical results relate only to the sample submitted.
This report shall not be reproduced, except in full without the written approval tion ESC.

Apported: (W/AA/OS CMISE Winter: CS/LA/OS (MISE)



12065 Letranis Ed. ft. Miller, TN 4/122 1215 254 (195) Lingston (195)

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DECISE OF EMPLOYED

Yo. Tony Passan Tempaths & Accountes Fall Topp Feary Head, curts the Silver, YO. 25 52 Tentender 17, 000

FOR Darkle # 1 CAMPAGE.

Description : Dultput Francisco Comple ID : CAMPLE 2 WEST

Andlest 4 :

Collected By : solen H.

ACC. - Relaw Detects in Light
Data Limit - Practical Countriction Supertified
Data
Data
The reported unsignable results relate only to the sample submitted.
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Reporters 00017008-15100 Practeds COUNTRING 1920

Page 5 of 1



Table 14.04 (00/08/18/08)

Ant. 1976

REPORT OF ANALYSIS

Mir Anchony Castant Cyvindron & Acceptator City for Philips Translin, TD PROCE

PER CHARGE * 1 - EXECUSA-CO

Date received : september 17, 2008 Description : Perting for Sulfront Hestalizer Second Water

Sample III : SOLUTE LAYSOND EAST

Estwo Str. d Product # 1 9991

Collected by 1 Collected Date 1 Confished Date

Assertas Assertas Lexas

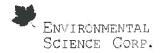
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Det. limit - practical distribution institutes

Histor

The reported unalytimal fermits remain any to the comple submitted.

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10000 Debaton Fir. 81. Silvet, TV 9715. 16151 754-0555 1000-167-1869

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Section 1970

DEPOST OF ASSAULTS

SUPPLIES STORY

Mr. Pany Passanio Community Associates 1706 Penga Verry Hold, Just Me Maloka, 16 (2012)

AC 59

Date Received | September 37, 2004 Evalentian | Unity at Featilities 700 Zugik # i | 136465-01

Despte in 1989 is Septe 1 West

Product 4

Theorem By the letter H.

PASSIFE 101				11/11/2	- GRIT	Medical	1,40,400,00	
TOTAL CONTRACTOR						31/17	0.67357496	
Ardenic Lead	61	6	1.059	50/1 07/1	1:0		10 17 18 18 10 7 18 18 18	1

FIG. 6 Notice Detects in Libert Note: human to the property of the US EPA Human - Established Constitution to the property of the US EPA Harris Manufacture Contaminate Level as epidelilines by the US EPA Harris Property and provide results to the total to the temperature of the property and the temperature of the property and the temperature of the property and the services of the property and the services of the property of the temperature of the property o

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REPORT OF ANALYSIS

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Date Excelled : July 23, 2004 Contribute : Colleges Festilises Sept- 12 : MACHELL STRE

TOUR Establisher

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Limit a Social Contamination for the security of the US EPA

Direct a Social Contamination of the security of the complex columnstation.

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Negottes: 07/96/00 14022 Frintes: 07/10/05 14:16



E21. 1970

SERVET OF AMALYSIS

Mr. Asthony Tamiano Clematon & Association 1.5. Eco (81911 Trans. On. TD 370-4

ESC Cample * 1 | \$25,0004-03

Decision # 1 1000

THE DESTRUCTION : TE - Lymn : Cliented by t AND W Cliented Oate t 07723708 16th

Date Seconded : Only 14, 2008 Learning : Only Postilizer

Assessed Assessed Level 1 60105 -W109 ...

elt * Selow Detection Limit Det. Their - Drackical Diametration Limit(Duta Diet : The reporter analytical results relate only to the sample submitted. This report shall not be reproduced, except in full without the sulton approval from ESC.

Fegurted: 07/80/08 14:07 Eranned: 07/10/08 14:14

APPENDIX E

TALLEY

OF

TREATED AND UNTREATED SOILS EXCAVATED AND DISPOSED OF AT LANDFILL

					ulfport, MS oject No. 20837					
			MAD Color		Hazardous Soil F					
Date	Load No.		Stockpile #	orises and Taken Manifest #	WM Scale Ticket #	Gross Weight	Tare Weight	Nel Weight	Net Tons	TOTAL E
9/8/08	1	59	7	COIT	780254	84,220	33,420	50,800	25.40	1
9/8/08	2	63	7P	0021	780253	83,600	33,460	50,140	23.07	
9/8/08	.3	007	71'	COST	780257	77,340	33,380	43,960	21.98	
9/8/08	4	-53	77	0047	780262	53,880	23,680	30,200	13.10	
9/8/08	5	59	71	005T	780268	84,320	33,420	50,900	25.45	
9/8/08	G	69	rr	COST	780270	85,860	33,460	52,400	26.20	
9/8/08	7	007	7	0071	780274	73,040	33,380	39,660	19.83	159,03
A.	53424		是相处。但是是		Series Andrews					All the said
9/9/08	8	53	5	008T	780299	49,760	23,680	26,080	13.04	
9/9/08	9	69	5	OUST	780304	83,960	33,460	50,500	25.25	
9/9/08	10	39	5	0101	780305	88,220	33,120	51,800	27.40	
9/9/08	11	007	5	01 IT	780306	84,740	33,380	31,360	25.68	
9/9/08	12	69	5	012T 013T	780310 780314	52,000 79,160	23,680 33,460	28,320 43,700	14.16 22.85	
9/9/08	13	39	5	0131 014T	780314 780318		33,420	46,900	23.45	!
9/9/08	14 15	007	10	0141 015T	780322	80,320 81,600	33,380	48,220	24.11	
9/9/08	16	53	10	OIST	780330	30,740	23,680	27,060	13.53	
9/9/08	17	69	10	0171	780333	77.800	33,460	44,340	22.17	
9/9/08	18	59	10	018T	780330	78,060	33,420	44,(40	22.32	
9/9/08	19	007	10	Telo	780342	76,960	33,380	43,580	21.79	†
9/9/08	-20	53	10	OZOT	780347	48,080	23,680	24,400	12.20	
9/9/08	21	62	10	021 I	780349	87,520	33,460	51,060	27.03	
9/9/08	22	39	3	022T	780353	89,320	33,420	53,900	27.95	i
9/9/08	23	007	3	023T	780359	86,720	33,380	75,340	26.67	
9/9/08	24	53	3	0241	780360	52,680	23,680	29,000	14.50	
9/9/08	25	69	-3	0251	780361	87,140	33,460	53,680	26.84	
9/9/08	26	39	3	026T	780363	90,980	33,420	37,560	28.78	
9/9/08	27	007	7	0275	780369	81,880	33,380	18,500	24.25	
9/9/08	28	53	3	0281	780372	51,800	23,680	28,120	11.06	ļ
9/9/08	29	(9) 59	3	0291	777670	86,140	33,460	52,680	20 34	7.0.00
9/9/08	30	259	4	CSOT	780381	89,820	33,420	36,400	28.20	512.57
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9/10/08	31	53	4	031T 032T	780 109 780 385	90,280 31,000	33,380 23,680	36,900 27,320	28.45 13,66	
9/10/08	33	59	-1	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	33	007	4	C3ST	780124	90,620	33,380	57,240	28.62	
9/10/08	36	59	4	Ø36T	780426	91.580	33,420	58,160	29.08	T
9/10/08	37	53	6	037T	780442	55,880	23,680	32,200	16.10	
9/10/08	38	007	6	0381	780448	97,420	33,380	64,040	32.02	
9/10/08	.19	59	Ġ .	03:11	780453	98,720	33,420	65,300	32.65	
9/10/08	-10	53	b	Oaor	780473	60,280	23,680	16,600	18.30	
9/10/08	4]	007	G	0411	780484	101,220	33,380	67,840	33.92	
9/10/08	-12	59	G	042T	780494	100,660	33,420	67,240	33.62	
9/10/08	43	007	8	043T	780527	99,300	33,380	61,920	30.96	
9/10/08	44	53	8	0441	780531	58,060	23,680	34,580	17.19	
9/10/08	45	59	8	04.71	780337	94,980	33,420	61,360	30.78	
9/10/08	-16	44	8	OIGT	780359	94,160	34,080	60,080	30.04	
9/10/08	47	007	8	0177	780563	96,380	33,380	63,000	31.50	<u></u>
9/10/08	48	39	8	0481	780072	91,540	33,120	38,120	29.06	40000
9/10/08	-5.57	93	8	0491	780570	57,600	23,680	33,920	16.96	496.44
		 								
									TOTAL TONS	1,168.04

Covington & Associates
Gulfport, MS
RS1 Project No. 20837
Non-Freated 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 Trcket#	Gross Weight	Ture Weight	Net Weight	Net Tons	TOTAL BY DATE
9/8/08	i	69	9	HATON	780226	32,140	35,460	48,680	24.34	
9/8/08	7	59	Э	002NH	7802.30	89,180	33.420	53,760	27.88	
978/08	3	53	9	003NH	780235	49,480	23,680	26,300	13.13	
978708	-1	007	2	O04NH	780256	79,140	33,380	45,760	22.68	
978708	- 5	69	2	005NII	780237	84,800	33,466	51,340	25.67	
9/8/08	ů.			COGNH		VOID	/ DID NOT U	SE.		113.92
9/10/08	7	44	2	007811	780796	93,520	34,080	59,440	29.72	JE 10 10 10 10 10 10 10 10 10 10 10 10 10
9/10/08	8	007	2	COSNIT	730600	-99,460	33,380	66,880	33.04	
9/10/08	9	53	12	309NH	780605	36,320	23,680	32,640	16.32	
9/10/08	10	59	1	RAGIO	780610	92,440	33,420	99,020	29.91	
9/10/08	11	44	1	ØHENH	891054	03.720	34,080	50,640	29,82	
9/10/08	12	007	1	012NH	780634	97,340	33,380	63,960	31.98	
2710708	1.7	53	1	01.3NH	7806311	-36,920	23,680	33,240	16.62	
9/10/08	14	29	10	014Nil	780696	96,800	35,420	63.380	31,69	218.70
								I	OTAL TONS	332.62

APPENDIX F ANALYTICAL CHAIN OF CUSTODY FORMS

Covington & Ass	ociates	Alm	erreto billin	information			7	alvais/Contened	Preservative	Prepared by:	Chain of Custody Page 1 of 1
Corporation 1636 Popps Ferr Ste. M-5 Biloxi, MS 39532	-	Heps	er to	Anthony i	Damisno		24 Nour		· Caraca	SCIEN	ONMENTAL CE CORP. banon Road
DIIONI, IVIO 00002	•	Emai	tony	@covingtor	rassociate	s.nel	6		And the second	Mt Juliet,	TN 37122
Project Gulfport	Fertilizer		Columns /	Loor	HUS	. 6	2		areas race	1	15) 758-5858
Phone 228-398-0486 FAX 278-84-24072	Cliant Project 9:		ESC Ken				\$		Andreas de la constante de la	87	1001 767-5859 115) 758-5859
Collected by Anthony Debricas	Stie/Facility ID#	9397	P.O.#			\neg	9		de proposition de la constantina della constanti		
Aruth D. Don	Sarre		. 100%	Ermi? _		No.	78			CoCode Template/Prologin	(Jab use only)
Immediately Packed on los N Y	Three		25%	FAX7	NoYes	Crite	0			Shipped Visit	
Semple ID	Comp/Grab	Metrix*	Depth	Date	Time		1			Recreate Contaminent	Semple # (lets only)
Area 2 Bollow North			25	<u> </u>							LEHLGIZ TO
Area 2 " south	-t1	35	72'	ļ		-		}			12
" widdle	H	ii.	72	1				1 1 1			-5
" Slewall North	11	11		ļ			1			ļ	
11 11 South	н	11	<u> </u>		Į.	1					725
" " EAST	((4			ļ	-				<u> </u>	-120
" " west	1,1	11					4	4 4		<u> </u>	707
	= -			ļ	i			4 42	174		
	LL		1	1	I		1	1 11 41	Finite		
"Matrix 88 - Soil/Solid GW - Grou	ndwater WW-W	rata Worker	DW - Drin	king Water (OT - Other				Нs	Te	mp
Remerka				963	2 6av	2 0	167		Flow	or	her
Hatte Pariso	Osta 5/23/	Time	Recei	ved by (3 gna	eturo)			Samples reliam	od via UPS	Condition	(lab use orey)
Reinquished by (Signature)	Gate C	Time:/		ved by (Signs				Tang you	Bottes Recev	CoC Seets Intact	-1-11Xm
Reimquished by (Signature)	Date:	Time		wed for tab to		6 }		Data Salasis	Time: DGOQ	pH Checked.	NCF

n ii . O Associat	laa l	Allemate billing	information:				Analy	вів/Соптапн	M/Preservative		Chain of Cuntray Page 1 of 1
Covington & Associat	les					-	www.dub.eh		- Valentine	Prepared by	
Corporation _					H					ENVIRO	NMENTAL
1636 Popps Ferry Ro	ad					13	1	3 13		SCIENC	
Ste. M-5	p	E Poor	Anthony () amilana		450	3	3		1206. Leb	
3iloxi, MS 39532	E	nel to				2	-	4		Mr. Juliet. T	N 37122
	<u> </u>	lony	Covingion	L W		School	45	2			5) 758-585B
spect Gulfnort Fertilizer		City-Sate Collected	- hal	+ 41-		W	4 42	N			0) 767-3859 5) 758-5859
228-396-0486 Client Fro	jezi P	ESC Kev						4) //X (B)	3
offected by Site/Facili	ty D# 9397	PO#				3		40		CaCede	(lab use only)
ollected by (signature) Rush?	(Lab MUST B Same Day	le Notifed)	Date Resul	ts Needed:	No.	5		7		Template Prelogin	
	Next Day	100%	Emal?		st	3	100	*	a de la companya de l		
products Packed Selve S V	Two Day Trans Day	25%	FAX1		Cran	5	丰	0		Shipped VIA	Sept a digital or 'y
Sample ID Comp/Gr		Depth	Date	Time	<u> </u>	1	7	7		1347763.01/03	7 1
soil stockpile to com	10 m		5/29/9		2	X	C			02	
n & #2 4		-	4		i	10	X			04	
Aces 2-second pass Bollom	1111112	<i>-</i>	u	<u> </u>	Ť			X		05	
Area 2 Second PASS SOMONL	II FRAIL		1			1)C		06	
W H H H	west "							*		07	
W = 16 W W	MOTHL .	,1						<u>k</u>		90	
1 - 11 4 pt	South 1				1_		_	8		89	
			<u> </u>			<u>i</u>	-	4	pl	1 50	10
Matrix 88 - SolVSold GW - Groundwater	WesterW - WW	ater DW - Dr	nkeg Weter					. الكامات	- Vi		er
Remarks					३८८	o	0		8777 Fi		(lab use orly)
	7/29/08		ived by: (S gr					FedEx	Bogies Re-	- OK	
Relanquished by: (Signature)	Wate & Fi	Real	nyad by (Sign	(exits)				Terps /	7-202	2-8 cc seasoned	
Retinostated by (Symptore)	Clate: Th	ne: Rec	elved to: bib	by Signah	(e)	1/	1	Date:	Time (3.6	ph Checked	NCF

	ociates	Alte	rneta biling	nformation	:	مفيسا	avers Corts one	TOLOTABLY		Chain of Custody Pega 1 of 1
Covington & Asse Corporation	Joidtes					8			Prepared by	
	v Bood					3			FATTR	ONMENTAL.
1636 Popps Ferr	y rtoau	1				<u></u>			15307	E CORP
Ste. M-5		Pen	A E	A	Damieno	-4			1	banan Road
Biloxi, MS 39532	•	-94	1 10			-3			Mt. Juliet,	
			F = 5-	.,	rassociates.	net			Phone is	15) 158-5858
BRITISON.	Fartilizer		Colored	w por	- MS	2º				00) 767-5859
hore 228-395-0486 AX:	Client Project ₱	į.	ESC Ken			_ \			FAX (6	15) 758-5859
collected by Arthroug Deporting	She/Fecility ID#	9397	POP			eA.				
offected by forgotion		MUST Be		Date Res	ults Needed:				CoCode	(lap nee out)
Anoth Davis	Nex	ne Day t Day	100%	Emas?	No Yes	4			Terrelete/Preiog h	
omediately Packed on los N 💮		Day	50% 29%	FAX7	No_Yee	3			Shipped Vite	
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				<u> </u>	1					
	1						1 1 1 2			7.0

1636 Popps Ferry F Ste. M-5	Road						745					ONMENTAL CE CORP.
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DIIOXI, IVIO 39332		Email to	tonyt	Covington	esocciato	s.net	, 0				Mt Jul et	TN 17122
Project Guifport Fert	fizer	ic	oland (ulfart	,us		3					15) 758-5858
Phone 228-395-3488 FM ped 228-86) - 2402	Project #		ESC AN	, , , , , , , , , , , , , , , , , , , ,	7		SE SE					00) 767-5859 15) 758-5859
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		ŀ		100		-			- 1			
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*Metric 89 - Sol/Solid GW - Groundwa Remarks	lar WW-Wat	i elaVVata	DW - Dee	king Water (OT - CORner_				pi Fi	icu	0	· · · · · · · · · · · · · · · · · · ·
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Ratinguished by (Signature)	Detail	Time.	Recei	ved by (Signa	HLMI)			173	Bottley Ba	-	CoC Sees Intact	YHM
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	Alten	rele billing i	nigeration			Anatyars C	nta met Ar	HERVALVE	[insperes by	Page 1 of 1
Corporation					Total .					NMENTAL
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ane 228-396-C488 Client Project#		ESC Key			12	اب		1	FAX (6)	53 758-5859
lected by San Facely O	9397	POS						11		
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Day oct				Fab (34)			-	8	oper.	15				5) 758-585F (0) 767-5859
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Covington & Associate	98				3.1	102		1	Pregared by:	
Corporation						38			# Exum	ONMENTAL
1636 Popps Ferry Ro	ad						12.11			E CORP
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Biloxi, MS 39532		1		onsimad yna		J		35.7	Mc Juliet,	
BIIOXI, IVIS 39332				ngtenassociate		ĵ.	10/10	133		15) 756-5858
Project Guifport Ferbilger		Cole	sur Gul	front, M	5 6	3		1-21		06) 767-5859
Phone: 228-396-0466		€3	SC Key		- 3	y of	631	134		(5) 758-5859
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Sanyan D Combiling				em Time	T	113		199	Rama to Committed	Sales page 9 (Reda D
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Biloxi, MS 3953	32		met b	tony@	Donvin gtor a	SSOCIBIUS	net	. 1	1				Phone (6)	5) 758-5858
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SECUPTOR OF	Chert Pro			ESC Key	3cc Car					1			FAX (6	51758-5859
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Covington & Ass	sociates	Alternete his	Englishermation	474	26	100		Present by:	
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Corporation		1		b) 41	131	152	1	ENVIR	ONMENTAL
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	2	1	Anthony Damisno	- 1	5	100		Mt lishet,	174 37122
Biloxi, MS 3953	_		nyi@covingtonassociates h		1			Prione (6	15 758-5858
Police: Outro	et Femiliaer	Usy the Color #	Gulfort, MS	0	2	12.7		Phone I	100) 767-5859
Description	Carena Project P	E30	The same of the sa	-20	7	1223	1	FAX (5153 758-5859
FAX: 228-396-0466	9397			- 3	4	133		#2	
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Petrocativity (Signature)	Dale	Tirng	Received to lot by 1850m tur	1		2808	09	0	
		-l	The same						

ENVIRONMENTAL SCIENCE CORP.

SAMPLE NON-CONFORMANCE FORM

Date: 2133/08 Fralusted by: 7667 Client: COVASSOC Client: COVASSOC Client: COVASSOC Chan of Custud, is missing improper preservation chain of Custud, is missing improper preservation (Tabin of custody is incomplete improper preservation (Tabin of custody is incomplete improper preservation (Tabin of custody is incomplete improper temperature) and inproper temperature and inproper temperature and inproper temperature and inproper temperature and insufficient pasking undertal and container improper handling by carrier (fedt x / UPS / Courier) Sample was force Commental incorrected by Call container insulates: 77 Client informed by Call container in the intentions: 77 Client contact: TCL P As 186	Date: 2133/08 Fralusted by: 7667 C'lient: COVASSOC C'lient: COVASSOC C'lient: COVASSOC C'hain of Custud, is missirg Improper container bye C'hain of custud, is missirg Improper container bye C'hain of custud, is missirg Insultation to manifer and m	Sumple No.	Numpie No. : 2356796	20h2-198-866
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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

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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.

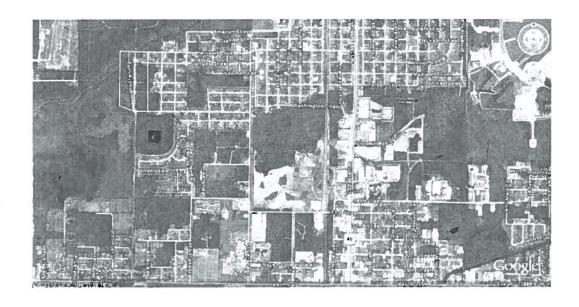
Implementation of these plans will be by RSI. Oversight of this project will be provided by Covington & Associates Corporation (Covington).

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 offsite. 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:

- Conduct waste analyses and trial treatment tests:
 or
- 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.

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

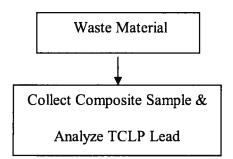
Process Confirmation Samples will be analyzed for TCLP using Method SW-846-1311 for extraction. The extract will then be analyzed for lead using EPA Method SW-846-6010.

Analytical TABLE II TREATED WASTE ANALYTICAL FLOW CHART

Remediation Services, Inc. All Analysis TCLP Pb (Lead)

Hancock Bank / Gulfport Fertilizer

Gulfport, MS



< 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.

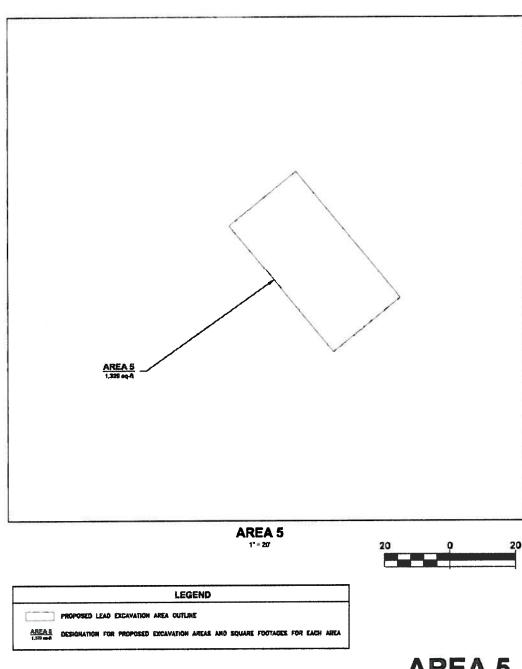
Bound log books shall be utilized for recordkeeping. Loose sheets will be used only for report records. The use of bound books tends to result in a chronological sequence of data insertion and aids in referencing data through a table of contents ordered according to time, type of analysis, type of sample, 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.

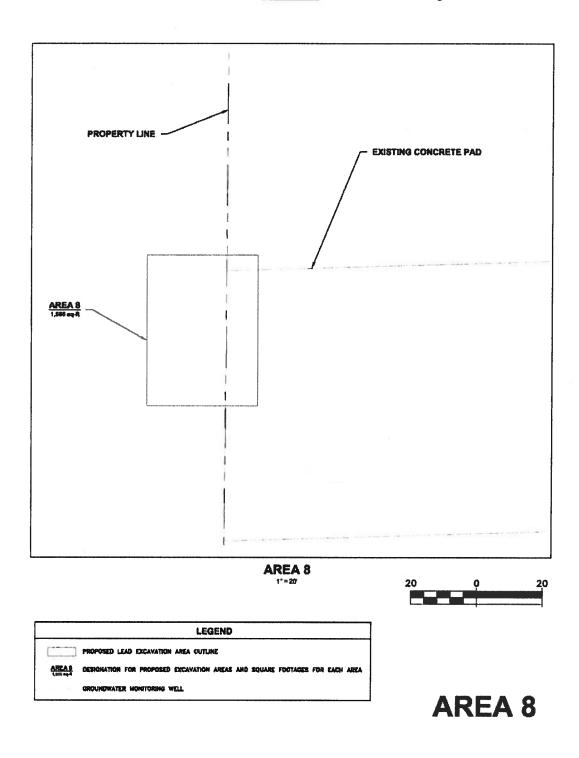
Accountability for a sample will begin when the sample is taken from its natural environment. A bound logbook will be maintained to record the acquisition of a sample. The information that will be recorded is project name, unique sample number, matrix, sample location, date and time, sampling method 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.

		ii.	
8-			



AREA 5



COVINGTON CIVIL & ENVIRONMENTAL, LLC

14257 DEDEAUX ROAD SUITE B GULFPORT, MS 39503

PHONE FAX E-MAIL (228) 396-0486 (228) 396-0487 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.

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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° 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° 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

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(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.

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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 nondetectable 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.

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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

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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.

Server Geologist

John F. Stabo, P.E.

Principal

ENCLOSURES

cc: Mr. Tony Russell, OPC - MDEQ

Mr. Delma Powell, Hancock Bank

LIST OF TABLES

Ta 1 Groundwater Elevations

Historical Groundwater Sampling Events Former Gulfport Fertilizer Site Gulfport, MS

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 27.77 28.26 4/2/2003 26.95 23.39 24.64 25.78 26.20 27.45 27.77 28.26 4/2/2003 27.15 25.58 27.00 26.16 27.48 27.45 27.77 28.26 6/12/2003 27.15 25.58 27.00 26.16 27.48 28.35 29.12 9/11/2003 27.15 25.92 25.26 26.20 27.48 28.35 29.12 9/11/2003 25.73 26.22 27.21 28.17 28.83 29.46 2/11/2003 25.64 26.26 26.20 27.21 28.37 29.46 2/11/2003 26.23 24.23 26.26 26.33 27.29 28.37 29.46 2/11/2004 26.23 27.21 27.41 27.36 27.30 28.37	Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
2 26.01 23.11 24.14 25.66 26.26 27.77 2 26.37 23.55 24.82 26.06 26.58 27.77 2 25.95 23.39 24.64 25.78 26.20 27.45 3 27.15 25.58 27.00 26.16 27.21 28.17 3 27.03 23.83 25.26 26.20 27.21 28.17 3 27.53 24.23 25.26 26.20 27.21 28.17 4 25.86 24.23 26.02 26.3 27.9 28.37 5 26.23 24.68 25.78 26.03 27.28 7 26.23 23.65 24.41 25.79 8 24.37 24.37 24.41 25.79 9 26.23 25.17 26.33 27.00 28.39 10 25.59 23.12 24.37 26.34 27.79 10 25.59 27.35 27.93 </th <th>6/19/2002</th> <th>23.61</th> <th>20.99</th> <th>21.84</th> <th>23.35</th> <th>23.89</th> <th>25.09</th> <th>25.51</th>	6/19/2002	23.61	20.99	21.84	23.35	23.89	25.09	25.51
2 26.37 23.55 24.82 26.06 26.58 27.77 25.95 23.39 24.64 25.78 26.20 27.45 2 27.15 25.58 27.00 26.16 27.48 28.35 2 27.03 23.83 25.26 26.20 27.21 28.17 2 27.03 23.83 25.26 26.20 27.21 28.35 2 25.47 22.92 23.63 25.52 27.21 28.17 2 25.47 26.02 26.3 27.9 28.37 2 25.86 24.23 26.02 25.78 26.03 27.28 2 26.23 23.65 24.68 25.78 26.03 27.28 2 26.23 23.65 24.17 26.13 27.00 28.34 2 26.07 25.1 26.34 27.79 26.34 27.79 1 27.53 25.54 27.9 26.34 27.79	12/12/2002	26.01	23.11	24.14	25.66	26.26	27.32	27.65
25.95 23.39 24.64 25.78 26.20 27.45 27.15 25.58 27.00 26.16 27.48 28.35 27.03 23.83 25.26 26.20 27.21 28.17 25.47 22.92 23.63 25.52 25.72 26.79 27.53 24.23 26.02 26.3 27.9 28.37 25.86 23.65 24.68 25.78 26.03 27.28 26.23 23.65 24.68 25.78 26.03 27.28 26.23 23.65 25.17 26.13 27.00 28.34 26.24 25.15 22.41 24.37 24.41 25.79 26.07 25.15 24.38 25.43 26.34 27.79 26.59 23.61 27 26.3 27.9 28.39 26.15 20.99 21.84 23.89 25.09 26.12 20.99 24.72 25.69 26.43 27.49	12/5-9/2002	26.37	23.55	24.82	26.06	26.58	27.77	28.26
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5 25.47 22.92 23.63 25.52 25.72 26.79 2 27.53 24.23 26.02 26.03 27.9 28.37 2 25.86 24.68 25.78 26.03 27.28 2 26.23 23.65 25.17 26.13 27.00 28.34 3 24.37 24.41 25.79 26.79 40 26.07 25.1 25.95 26.22 27.00 28.39 10 25.59 23.12 24.38 25.43 26.34 27.79 10 25.59 23.12 24.38 25.43 26.34 27.79 10 25.59 27.38 26.34 27.79 28.37 10 27.53 26.34 27.9 28.37 10 25.58 27.84 27.39 26.09 10 25.58 27.84 27.49 27.49	9/11/2003	27.03	23.83	25.26	26.20	27.21	28.17	28.82
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3 24.37 21.52 22.41 24.37 24.41 25.79 10 26.07 25.1 25.95 26.22 27.00 28.39 10 25.59 23.12 24.38 25.43 26.34 27.79 10 25.59 23.12 24.38 27 26.3 27.9 27.79 1 27.53 25.58 27 26.33 27.9 28.37 1 23.61 20.99 21.84 23.35 23.89 25.09 1ion 3.92 4.59 5.16 2.95 4.01 3.28 26.12 23.49 24.72 25.69 26.43 27.49	11/1/2007	26.23	23.65	25.17	26.13	27.00	28.34	28.83
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1 23.61 20.99 21.84 23.35 23.89 25.09 ilon 3.92 4.59 5.16 2.95 4.01 3.28 26.12 23.49 24.72 25.69 26.43 27.49	Max. Elevation	27.53	25.58	27	26.3	27.9	28.37	29.46
iion 3.92 4.59 5.16 2.95 4.01 3.28 26.12 23.49 24.72 25.69 26.43 27.49	Min. Elevation	23.61	20.99	21.84	23.35	23.89	25.09	25.51
26.12 23.49 24.72 25.69 26.43 27.49	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)	WW-9	MW-10	MW-11	MW-12	MW-13	WW-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	6.1	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).



Ta 2 Arsenic Concentrations

Groundwater Investigation Former Gulfport Fertilizer Site Gulfport, MS

Date	F-MW-1	MW-2	MW-3	MW-4	9-MW	MW-6	L-WM
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	SN	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	0.000	0.014	0.00	<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		0.026	1				
5/14-15/2010	0.053	0.014	<0.010	0.019	<0.010	0.022	0.011
13-Duplicate	0.053						
Average	0.024	090'0	0.014	0.042	0.011	0.030	0.014
Sampling	MW-8 &	6-AUM	MW-10	NW-11	MW-12	MW-13	MW-14
44 14 15007		0.00	0.40	0,00	070	0,00	0.00
10-Duplicate	40.010 0.010	0.00		200	0.00	\$0.010 \$0.010	0.00
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 8/14-15/2010	010	6	6	5	2,0	6.0010 6.0010	, ,
13-Duplicate	200	2	2	9.97	0.0.0	6.010 0.010	0.0.0
Average							

All arsenic concentrations in mg/l.
 Arsenic concentrations in bold represent positive detections above the laboratory detection limit.
 Arsenic concentrations exceeding MDEQ Tier 1 Groundwater MCL for arsenic (0.010 mg/l) are shaded.

Ta 3 Lead Concentrations

Groundwater Investigation Former Gulfport Fertilizer Site Gulfport, MS

9000	0.011	0.008	0.012	0.010	0.00	0.025	Average
						0.078	13-Duplicate
<0.0018	<0.0018	<0.0018	<0.0018	<0.0018	0.0042	0.080	6/14-15/2010
					0.0039		12-Duplicate
<0.0010	0.0055	0.0017	0.0028	0.0012	0.0040	0.048	12/2/2009
<0.0050							1-Duplicate
<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.071	12/9/2008
<0.0050					0.0051		0-Duplicate
<0.0050	<0.0050	<0.0050	0.014	<0.0050	<0.0050	990.0	11/1/2007
	<0.0050						9-Duplicate
<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.0057	0.009	2/17/2006
<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.042	8-Duplicate
<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.042	3/4/2004
<0.0050	<0.0050	0.0058	<0.0050	<0.0050	<0.0050	0.0068	7-Duplicate
<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.0072	12/2/2003
0.0062	0.008	0.0086	0.015	0.0092	0.013	0.028	6-Duplicate
0.0068	0.0087	<0.0050	0.014	0.010	0.011	0.029	9/11/2003
0.0051	0.0074	6900.0	0.013	SN	0.0083	0.019	5-Duplicate
<0.0050	0.0071	0.0063	0.014	0.011	0.0094	0.027	6/12/2003
<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.022	4-Duplicate
<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.023	4/2/2003
	<0.0050		0.0056				3-Duplicate
<0.0050	<0.0050	<0.0050	9900.0	0.0076	0.0095	0.023	12/6-9/2002
	0.014	0.011	0.016	0.011	0.011		2-Duplicate
0.0062	0.017	0.012	0.0053	<0.0050	<0.0050	0.014	12/12/2002
		<0.0050	0.014			0.015	1-Duplicate
<0.0050	<0.0050	<0.0050	0.016	0.0087	0.0074	0.020	6/19/2002
)-tale				~	7-06III		Date

Sampling Date	MW-8 & MW-8(A)	6-AM	01-WW	MW-11	ZI-AANI	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	

- All lead concentrations in mg/l.
 Lead concentrations in bold represent positive detections above the laboratory detection limit.
 Lead concentrations exceeding MDEQ Tier 1 Groundwater MCL for lead (0.015 mg/l) are shaded

Table 4 pH Readings

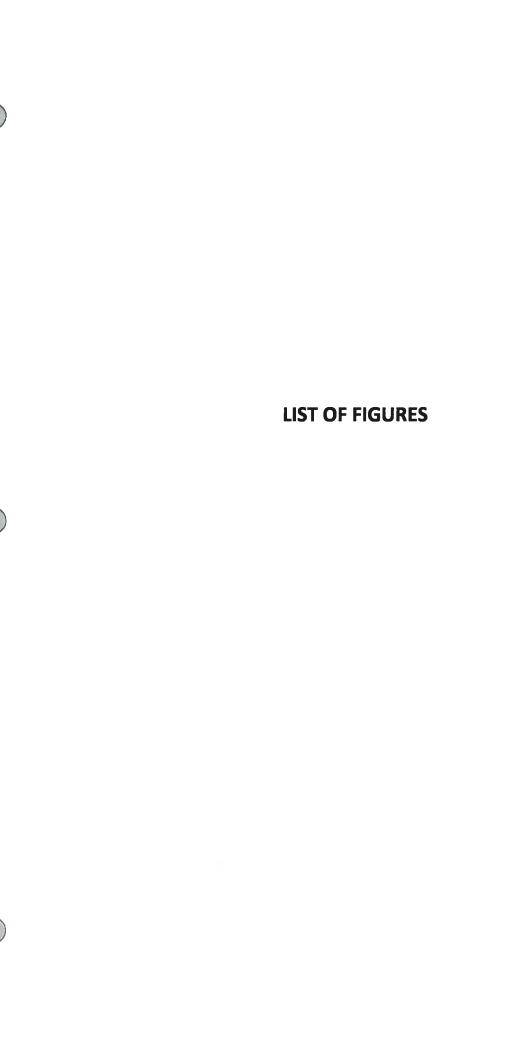
Groundwater Investigation Former Gulfport Fertilizer Site Gulfport, MS

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 6.39 12/15-9/2002 3.25 4.15 4.02 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 9/1/2003 3.16 3.99 3.83 4.08 4.77 5.89 6.39 9/1/2003 3.16 3.99 3.88 4.18 4.45 5.83 6.24 12/2/2003 3.24 3.96 4.08 4.45 4.45 5.83 6.24 2/17/2004 3.27 3.86 3.75 4.74 4.66 5.90 6.09 2/17/2005 3.27 3.86 3.75 4.74 4.66 5.90 6.21 11/1/2007 3.23 3.64 3.6 4.35 4.77 5.84 6.23 12/2/2009	Sampling Date	MW-1	MW-2	MW-3	NW-4	IMW-5	NAV-6	NFW-7
3.24 3.94 4.04 4.46 4.93 5.86 3.26 3.91 3.98 4.43 5.06 5.70 3.25 4.15 4.02 4.32 4.98 5.88 3.10 3.75 3.83 4.08 4.70 5.90 3.16 3.99 3.88 4.18 4.45 5.83 3.34 3.96 4.08 4.45 4.45 5.83 3.24 3.86 3.92 4.27 4.46 5.90 3.27 3.86 3.75 4.74 4.63 6.21 3.23 3.64 3.6 4.74 4.95 5.76 2.96 3.06 3.71 4.44 4.95 5.76 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 4.06 5.55	6/19/2002	3.22	3.95	3.96	4.41	5.06	5.41	6.23
3.26 3.91 3.98 4.43 5.06 5.70 3.25 4.15 4.02 4.32 4.98 5.88 3.10 3.75 3.83 4.08 4.70 5.90 3.16 3.99 3.88 4.18 4.45 5.83 3.34 3.96 4.08 4.45 4.77 5.62 3.24 3.85 3.92 4.27 4.46 5.90 3.27 3.86 3.75 4.74 4.63 6.21 3.23 3.64 3.6 4.35 4.77 5.84 3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 5.55 3.17 3.76 4.06 5.55	12/12/2002	3.24	3.94	4.04	4.46	4.93	5.86	6.33
3.25 4.15 4.02 4.32 4.98 5.88 3.10 3.75 3.83 4.08 4.70 5.90 3.16 3.99 3.88 4.18 4.45 5.83 3.34 3.96 4.08 4.45 4.45 5.62 3.24 3.85 3.92 4.27 4.46 5.90 3.27 3.86 3.75 4.74 4.63 6.21 3.23 3.64 3.6 4.35 4.77 5.84 3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 4.06 5.55 5.55	12/5-9/2002	3.26	3.91	3.98	4.43	5.06	5.70	6.40
3.10 3.75 3.83 4.08 4.70 5.90 3.16 3.99 3.88 4.18 4.45 5.83 3.34 3.96 4.08 4.45 4.45 5.62 3.24 3.85 3.92 4.27 4.46 5.90 3.27 3.86 3.75 4.74 4.63 6.21 3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55	4/2/2003	3.25	4.15	4.02	4.32	4.98	5.88	6.39
3.16 3.99 3.88 4.18 4.45 5.83 3.34 3.96 4.08 4.45 4.77 5.62 3.24 3.85 3.92 4.27 4.46 5.90 3.27 3.86 3.75 4.74 4.63 6.21 3.23 3.64 3.6 4.35 4.77 5.84 3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 3.78 4.33 4.80 5.77	6/12/2003	3.10	3.75	3.83	4.08	4.70	5.90	6.09
3.34 3.96 4.08 4.45 4.77 5.62 3.24 3.85 3.92 4.27 4.46 5.90 3.27 3.86 3.75 4.74 4.63 6.21 3.23 3.64 3.6 4.35 4.77 5.84 3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 3.78 4.33 4.80 5.77	9/11/2003	3.16	3.99	3.88	4.18	4.45	5.83	6.24
3.24 3.85 3.92 4.27 4.46 5.90 3.27 3.86 3.75 4.74 4.63 6.21 3.23 3.64 3.6 4.35 4.77 5.84 3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 3.78 4.33 4.80 5.77	12/2/2003	3.34	3.96	4.08	4.45	4.77	5.62	6.47
3.27 3.86 3.75 4.74 4.63 6.21 3.23 3.64 3.6 4.35 4.77 5.84 3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 3.78 4.33 4.80 5.77	3/4/2004	3.24	3.85	3.92	4.27	4.46	5.90	6.35
3.23 3.64 3.6 4.35 4.77 5.84 3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 3.78 4.33 4.80 5.77	2/17/2006	3.27	3.86	3.75	4.74	4.63	6.21	6.20
3.20 3.56 3.71 4.44 4.95 5.76 2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 3.78 4.33 4.80 5.77	11/1/2007	3.23	3.64	3.6	4.35	4.77	5.84	6.23
2.96 3.06 3.16 4.08 4.86 5.61 2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 3.78 4.33 4.80 5.77	12/9/2008	3.20	3.56	3.71	4.4	4.95	5.76	6.21
2.76 3.20 3.26 4.06 4.75 5.55 3.17 3.76 3.78 4.33 4.80 5.77	12/2/2009	2.96	3.06	3.16	4.08	4.86	5.61	5.75
3.17 3.76 3.78 4.33 4.80 5.77	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

te	MW-8 & MW-8(A)	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14
7	5.11	4.5	4.21	4.09	6.01	4.1	4.36
79/2008	5.04	5.01	4.24	4.41	5.97	4.04	4.10
2/2/2009	4.85	4.42	3.18	3.72	3.97	3.72	3.79
910	4.46	4.14	3.71	3.44	4.38	4.04	3.78
age	2.08	4.76	4.23	4.25	5.99	4.07	4.23

Notes:

1. All pH readings are expressed in standard units.



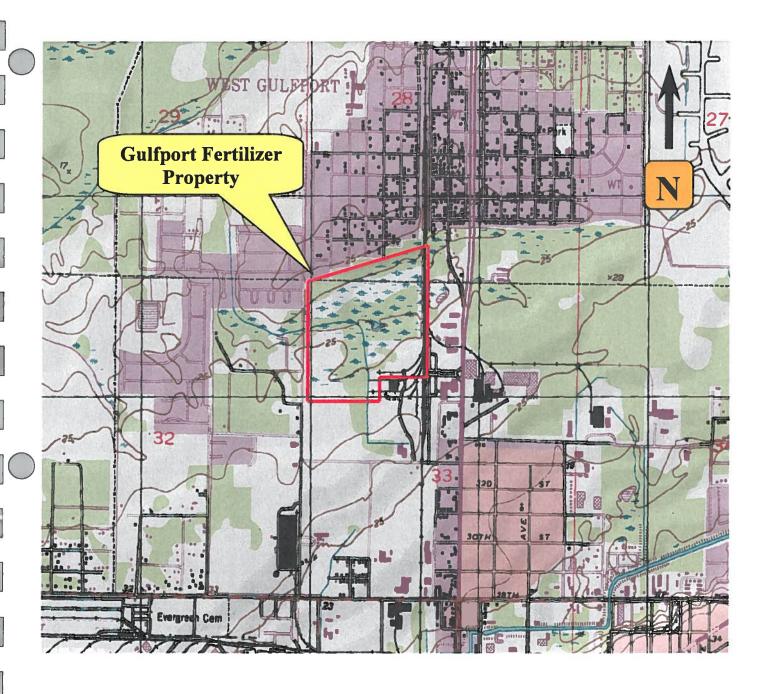
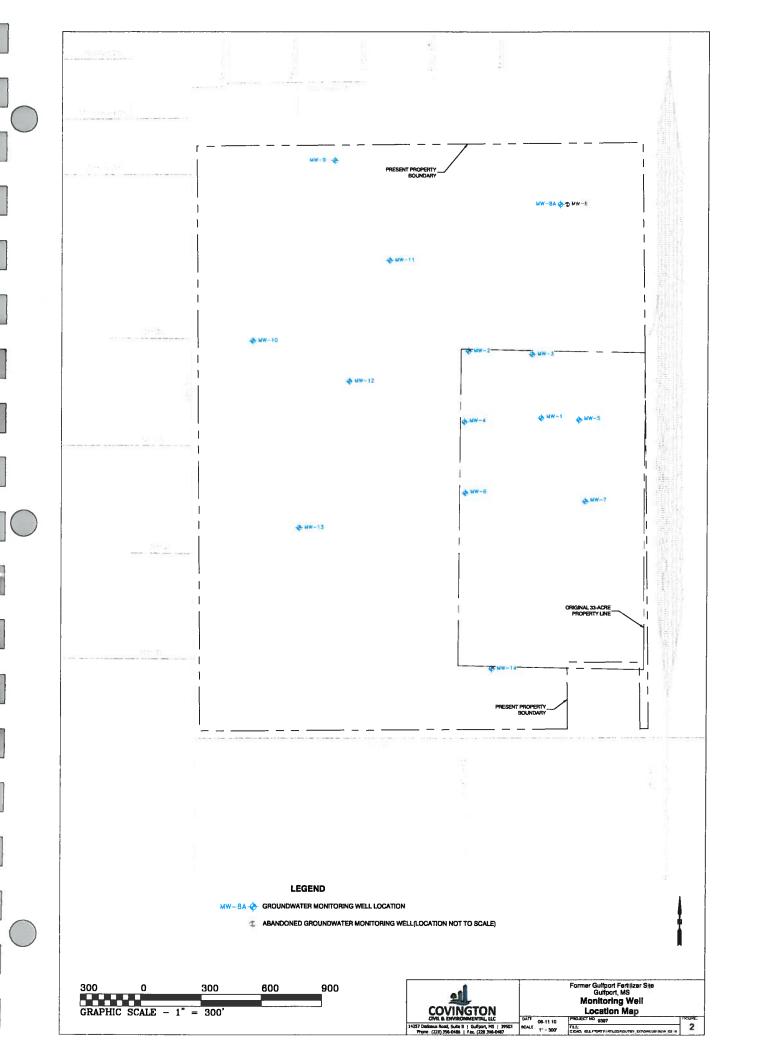
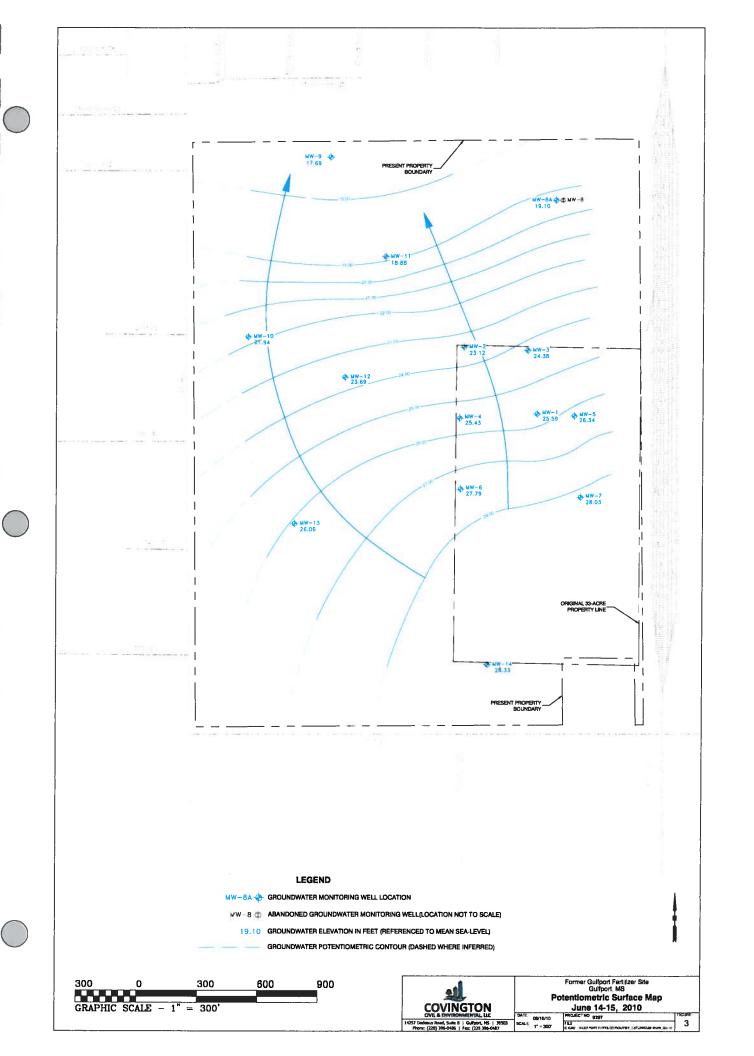
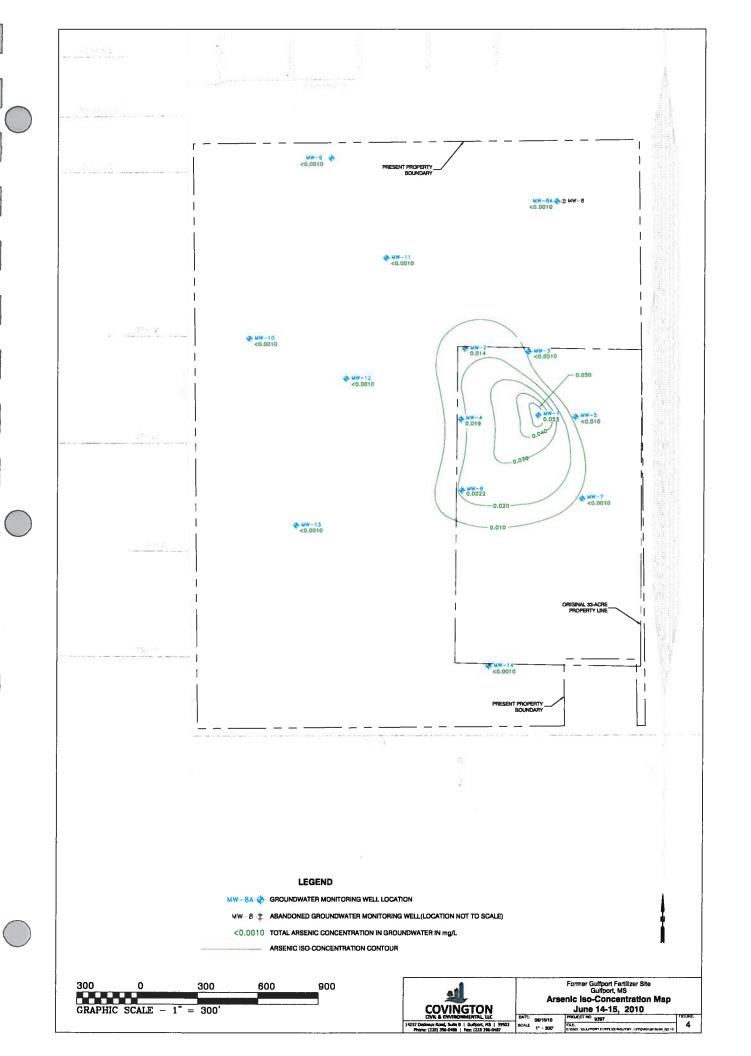
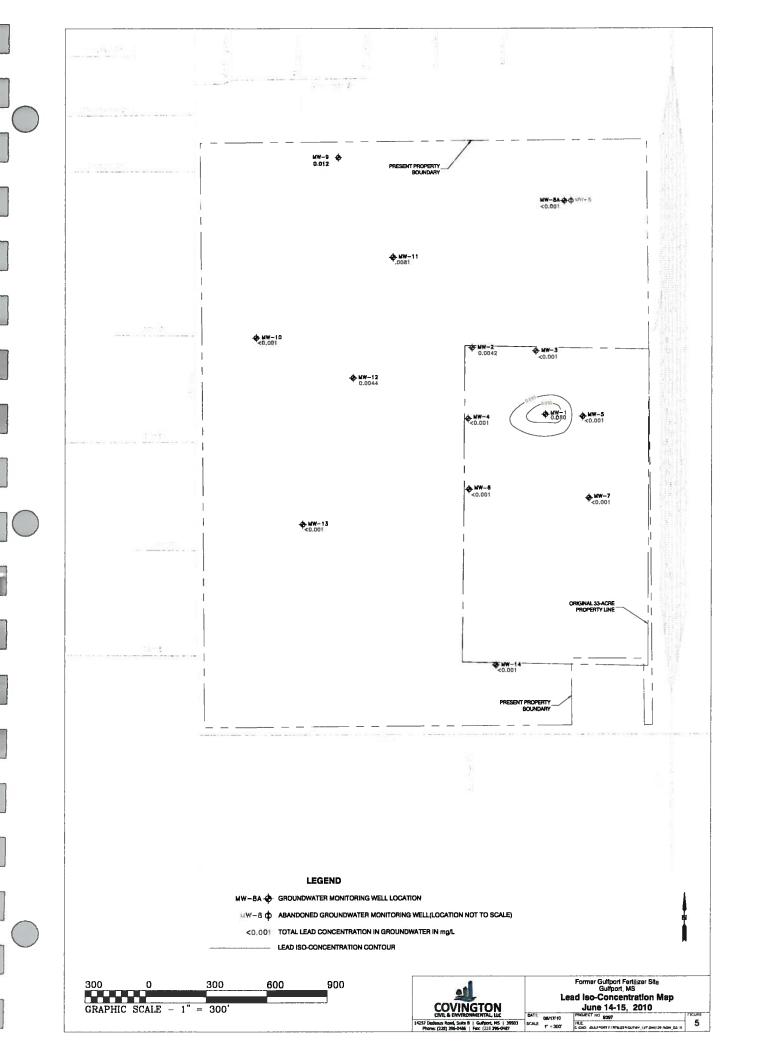


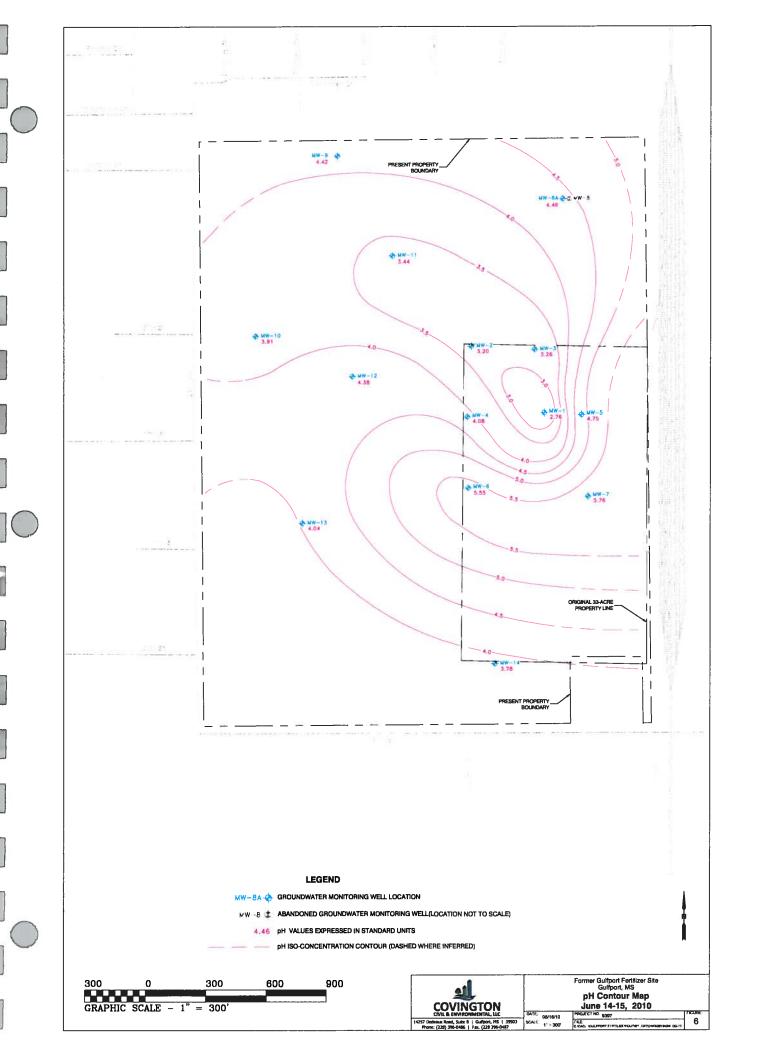
Figure 1 - Site Location Map Gulfport Fertilizer Site U.S.G.S. 7.5-Minute Quadrangle Map Gulfport North, Mississippi 1994 CAC Project # 9397











APPENDIX A

Well Sampling Field Data Sheets

Well Sampling Field Data Sheet Covington and Associates Comporation

Sampler: DH Meter No. Conductivity Meter No. Turbidity Meter No.								
Sampler: DH Meter No. Conductivity Meter No. Turbidity Meter No.		משה בוספנו וונו		9397		Cfty:	Gulfport	
pH Meter No. Conductivity Meter No. Turbidity Meter No.		CAC Project Descripti	ription:	Gulfport Fertilizer Site	Site	State:	MS	
Pri meter No. Conductivity Meter No. Turbidity Meter No.				Field Equipment	Dent			Particular programme and progr
Conductivity Meter No. Turbidity Meter No.					Serial No.			
Turbidity Meter No.					Serial No.			
					Serial No.			
		THE PROPERTY OF	はの数ををはながっています	Well Information	thom	STATE OF THE PROPERTY.	TO STATE STATE SELECTION AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON A	THE RESIDENCE OF THE PARTY OF T
Well No. Well	7	Top of Casing		Top of Screen	Bottom of Screen	Water /	Water I avel	Make
Diameter	reter	Elevation (m	Elevation	Elevation		Elevation	
(inches)	(Sec	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)		(Feat)
MW-1 4"		32.43	29.35	27,26	17.26	10,0	J. C. 674	ش
Well Casing Construction:						1	0.4.78	
	TOWN STREET		HOLD STATE OF THE PARTY OF THE	Calibration for Well Volume	II Volume	STANSON CONTRACTOR		
THE REPORT OF THE PERSON NAMED IN	のはいないから	記を まかれたとう	(Water Co	Numn. in Feet X 7.4	(Water Column, in Feet X 7 481 X Well Muttinion)			
3/4" Well	Well			1" Well	The second secon	CALL TO SELECT THE SEL	10-101-17	
Well Multiplier:		0.023	Well Multiplier		0.044	ARADI B.R. det 13	4 Well	
Well Volume = Water Column X	-		Well Volume = Water Column X	ir Column X	50.0	Well Muliplier	2000	0.853
Well Multiplier (Gallons):			Well Multipli	Well Multiplier (Gallons):		Weil Weil Mull	Welf Muliplier (Gallons):	- R. SN
Weil Volumes X 3 (Gallons):			Well Volumes X 3 (Gallons):	salions):		Well Volumes X 3 (Gallons)	(Gallone)	
Min. Valume to be Purged (Gallons):	:(8):		Min Volume to be D.	himsel (Callone)			Company.	X
10 port C. swy	SPECIFICATION OF THE	SPECIES STATES OF	The sound to be ruiged (Sendils).	uiged (Sellotts).		Min. Volume to be Purged (Gallons):	Purged (Gallons):	10,00
Purgin				now Building	nation			
Time	_	Purged Volume	Field	Conductivity	Discolute			
	_	(Gallons)	Temperature	(Transport	Oxygen		Oxygen	Figda
(Hr:Min) (Min.)	2		(၁)	(mS/cm)	(mad)	i	Potential /m//	Milliam
11:54 Vuca	3						(Alli) IBDIIANO	5
\\C.\\C\\\	70	x	726	700	14.0	ין	•	
12.2%	,	1	1000	7 01 X	0.31	410	430	0.01, 2.0
4	+	XX	93.5	01118	C,32	4174	1011	
eleveth, 4:55		σ	K	0,420	C2 €	プロで	457	١,
07:51		5	22.8	(3)	3	47		347
≥n·Strao		(2)	3	51.0		3/10	<i>y</i>	0,14.2
1			4	() (8.3)	0.51	3/6	4 7	0, 1, 1, 2, 3,
700.	+	500	+ . E.E	Odas	~ 0	200	9)1	2 - 2
2,55		_	なべな	3510	2.0	176.4	7777	4
25.80		10	27.0	7010	000	17.50	31	
V V V V	,	1	7	101	2	-	4/5	0.0.0
	0	+	128	+1/11	37 3	10 4.0	(_A	•
	7		-)		
				^				
Signature of Field Technician:			i en					
1		1	1					
500 LOCA (50			7					Page 1 of 2
NOTE - MW-1 Casing gradified (extend up) in Oct 2007. TOC elevation noted on this data school noticed and account account.	il (dn pue)xa	1 Oct 2007. TOC e	levation noted on this	. challe sheet mellers	Colored Providence "Advisor"			
1.1				ם תפופ חובבו ובווברים	newly surveyed modific	cation		

Well Sampling Field Data Sheet Covington and Associates Corporation Page Chalotter are

		CAC Project No.		9397		City:	Gulfport	
Sampler: (C. / 15.14.	CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	MS	
				Field Equipment	ent		Section and Property of the Street, Section 2019	The County of th
pH Meter No.					Serial No.			
Conductivity Meter No.	r No.				Serlal No.			
Turbidity Meter No.					Serial No.			
			AND DESCRIPTION OF STREET	Well Information	lon	STATE OF STREET, STATE OF STREET, STATE OF STREET, STATE OF STATE OF STREET, STATE OF STREET, STATE OF		CHARLES THE PROPERTY OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TRANSPORT OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TRANSPORT NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TRANSPORT NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TRANSPORT NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TRANSPORT NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TRANSPORT NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TRANSPORT NAMED IN CO
Well No.	Well	Top of Casing Elevation	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water
	(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	Elevation (Feet)	Column
MW-2	23.	28.75	25.89	20.96	10.95	5,63	71.5.6	C - C
Well Casing Construction:	ruction:							
				Calibration for Well Volume	Volume			
	3/4" Well		(Water Co	Water Column, in Feet X 7.48.1 X Well Multiplier	1 X Well Multiplier)			
Well Multiplier:		0.023	Well Multiplier	11244 7	0.482	1 A Call In A. Mindian	6" Well	
Well Volume = Water Column X Well Multiplier (Gallons)	r Column X		Well Volume = Water Column X	er Column X	000	Well Volume = Water Column X	er Column X	1.469
Well Volumes X 3 (Gallone):	Sallonet:		VVeil Murlip	well Multiplier (Gallons):	01-1	Well Multip	Well Multiplier (Gallons):	
in Volume to be D	imod (Callana).		weil Volumes X 3 (Gallons):	Sallons):	100	Well Volumes X 3 (Gallons):	Gallons):	
with volume to be ruiged (Salions).	uigeo (canons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	56,5	Min. Volume to be Purged (Gallons):	Purged (Gallons):	
Purging Methodology:				Sampling Information	ation			
Time	Time	Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
(Hr:Min)	(Min.)	(Salions)	lemperature (°C)	(m2/5m)	Oxygen	Ŧ	Reduction	Turbidity
06:30	5.5	7			(mad)		Potential (mV)	CIN Y
36:35	و٠	D	2) 10	2002	101	202		100
P5:30	6-5			1007	7 7	4	1800	765 06
06:43	70			6 1 7	8	2180	200	1
Q6:47	7.5		2	6.1.9	9	200	スし	
06:51	S.0		[٦,,		40	7	1,
06:55	2,8			17.7	38.8	80.2	22	10.0 0.00 0.00
						2000	75	0.0
06:57	SAMPL	1 1 1						
								-
Signature of Field Technician:	schnician:	1	\					
			-		The second lives and the second lives are as a second lives at least a second			

Page 1 of 2

Sampler: C. L. DH Meter No.				9397		:4	1 - 1	
pH Meter No. Conductivity Meter N	Ĺ	CAC Project Desc	cription:	Gulfnort Fartilizar Cha	Cho	City	Gumport	
pH Meter No. Conductivity Meter N				Field Foulament	one	State:	#S	
Conductivity Meter N					Serial No.			
	0.				Serial No.			
Turbidity Meter No.					Cario! No			
			STREET, STREET	Well Information	on and			
Weil No.	Well	Top of Casing	Ground	Top of Screen	Bottom of Screen	Wether	With the Paris	
	Diameter	Elevation	Elevation	Elevation	Elevation	lava l	Transfer Ceve	Water
	(inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	
MW-3	2,	30.26	27.46	21.32	11.32	00	2117	A 7
Well Casing Construction:	tion:					100	200	70.7
		THE REAL PROPERTY AND ADDRESS OF THE PERSON NAMED IN COLUMN TWO PERSONS AND PE		Calibration for Well Volume	Vramma			
Company of the last of the las			(Water Co	(Water Column, in Feet X 7.481 X Well, Muthiblier)	1 X Well Multiplier			
	3/4" Well			2" Well			On 192-11	
Well Multiplier.		0.023	Well Multiplier:		0.482	TAKALI BALAKSAR	D Well	
Well Volume = Water Column X	olumn X		Well Volume = Water Column X	er Column X	20.0	Well Volume = Water Column Y	ar Column Y	1.469
weil Muniplier (Gallons):	Gallons):		Well Multipli	Well Multiplier (Gallons):	21.12	Well Multir	Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):	ons):		Well Volumes X 3 (Gallons):	Sallons):		Mell Volumes × 2 (Call	College	
Min. Volume to be Purged (Gallons).	ed (Gallons).		Min. Volume to be Purged (Gallons):	umed (Gallone)	5	Vocal Volutilies A 3 (sailons).	
Purging Methodology:				Sampling Information		Iviii. vuiume to be Purged (Gallons);	urged (Gallons):	
Time								
	Purged	rurged Volume (Gailons)	Field Temperature	Conductivity	Dissolved	Peld	Oxygen	Field
힏	(Min.)		(၄)	(mS/cm)	(mag)	£	Potential (m)	lurbidity
15:58							(Alle) (Britano	(O.R.)
12.20			7.66	29.5	200	7 / 7		
18.81			5	25.0	5 to		7	0110
11.13			***	1780	775	7 2	250	5.00
(C)			1,00	817.5	いり	00° 2	しらら	D 7 0 0
10.0			かんの	7,7,7	67	3.25	877	۲
10:00			32. (706	27	インフィ	, Vuo	, ,
16:10	SA SA	16				100	417	ププト
	2							
	1			,				
Signature of Field Technician:	nician	とくく	\					

Page of 2

	15		Covi	Well Sampling Field Data Sheet Covington and Associates Corporation Pass Christian, MS	Data Sheet ss Corporation , MS				
Sampling Date:	W.	CAC Project No.		9397		City:	Gulfport		
Sampler: 7	スキ	CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	MS		
			以 10 00 00 00 00 00 00 00 00 00 00 00 00	Field Equipment	ent				
pH Meter No.					Serial No.				
Conductivity Meter No.	No.				Serial No.				4
Turbidity Meter No.					Serial No.				
7		The state of the s	The State of the S	Well Information	non			CONTRACTOR OF STREET	
Well No.	Meil	Top of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water	
	(Inches)	(Feet)	(Feet)	Elevation	Elevation	Level	Elevation	Column	
MW-4	2	28.28	25.01	20.40	70.40	767	(reel)	(Leet)	
Well Casing Construction:					04:01				
	Constitution of the Consti		The second second second	Calibration for Well Volume	Volume	04,60	43.50	70107	
			(Water Co	rater Column, in Feet X 7.481 X Well Muttiplied	1 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 (Galtons):	r Column X er (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	lume = Water Column X Well Multiplier (Gallons):	T	Well Volume = Water Column X	me = Water Column X Well Multiplier (Callons)		
Well Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons):	3allons):	(2.45)	Well Volumes X 3 (Gallons)	(Gallone):		
Min. Volume to be Purged (Gallons):	urged (Gallons):		Min. Volume to be Purged (Gallons):	'urged (Gallons):	1	Min Volume to be Purged (Gallons):	Purned (Gallone)		
Pureing Methodology:	14.			Sempling Informatio	attor (7,36)				
Time	Time	Purced Volume	Eleid	Condimentalists	Nies-fred	7772			
	Purged	(Gallons)	Temperature	Suprement	Oxygen	Hd	Oxygen Reduction	Field	(
(Hr:Min)	(Min.)		(2,)	(mS/cm)	(mdd)		Potential (mV)	A CONTROL M.C.	To La
1									
			000	3 1		11 5.3	2/0	8	(とより)
30. CO		1							
いたの	8.0	7	212	V.0.7	2	299	- t	000 - 000	
67:19	8.8		4:12	49.8	(O)	100	17.		
07:23	0.9		-1-2	4.40	PS.O	20 2	100) [
F6:40	6.5		7.12	1.00	0.43	707	9) 6	0	
7: to	0.		フ・レイ	-	S.E.	400	70		
27:50	7.5		2.1.5	X	200	2	5	12. S.	
	SAMPI	N/W		71 9	[XY]	7.7			
•									
		1							
Signature of Field Technician:	echnician.		1					•	
		1							

Well Sampling Fleid Data Sheet Covington and Associates Corporation Date Christon MS

				Taba Cilibrati, mo	33				
Sampling Date:	01.61.0	CAC Project No.		9397		Cfty:	Gulfport		43
Sampler:	して	CAC Project Description:	ription:	Gulfport Fertilizer Site	Sitte	State:	MS		5270
			医皮肤性腹膜炎	Field Equipment	emt.			1 年 日 日 日 日 日 日 日 日 日 日 日 日 日 日 日 日 日 日	
pH Meter No.					Serial No.				2
Conductivity Meter No.	r No.				Serial No.				
Turbidity Meter No.				>	Serial No.				
		THE PERSON NAMED IN	The state of the state of	Well Information	uo				
Well No.	Well	Top of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water	
	(inches)	Elevation (Feet)	Elevation (Feet)	Elevation (Feet)	Elevation (Feet)	Leve!	Elevation (Feet)	Column	
S-MM	2	32.10	29.25	23.19	16.49	1/2/2	.1~	7- 4	
Weil Casing Construction:	truction:							3	
			Office	Calibration for Well Volume	Volume				
	3/4" Well			2" Wall	1 A Well munipher)	_	Be Well	A STATE OF THE PARTY OF THE PAR	
Well Multiplier:		0.023	Well Multiplier:		0.163	WelkMulfinlier	o aven	1 460	
Well Volume = Water Column X Well Multiplier (Gallons)	lume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X	lume = Water Column X	111 (Well Volume = Water Column X	r Column X		
Well Volumes X 3 (Gallons):	Gallons):		Well Volumes X 3 (Gallons)	Sallone)		Well Wallings X 2 (April 2011)	vven multiplier (Genons):		
Min. Volume to be Purged (Gallons):	urged (Gallons):		Min. Volume to be F	e to be Purged (Gallons):	772	Min Volume to be Purged (Gallone):	urged (Gallone)		
Purging Methodology:	:ABo			Sampling Information					
Time		Purged Volume	Field	Conductivity	Dissolved	Field	Oxvaen	Field /	
(Hr:Min)	Purged (Min.)	(Gallons)	Temperature (°C)	(mS/cm)	Oxygen (ppm)	¥	Reduction Potential (mV)	*	MACHET
(3:13							()	7	1 - 0
13:28	0		4.50	31.5	0,85	7	26.8		4
13225	S S).cc	32.8	60,38	120	מאנג		ρO
13:40	0.۲			77.9	D.30	ルバコ	なかい	007.100	_
(3)45	7.5		7.66	25.0	5,75	イウス	220	V C 100	7
12:49	08		4.64	24.12	57.0	77.77	721	00/00	-1
(3153	579		A CC	7,4,4	27.7	1	225	マントン	
13151	9,5°		7	न्य, ज	27.75	ントフ	86.6	DO DO LA PE	
X 12,59	SAM	Se					7	200	
Signature of Field Technician	Technician	5	\						
	>		The state of the s						

Well Sampling Field Data Sheet Covington and Associates Corporation Pass Christian MS

Sampling Date: Col. 1 1 Col. Cropical Description: California State State Reservation State Reservation State Reservation State Reservation State Reservation Reservation State Reservation Reservatio						covinguin and Associates Corporation Pass Christian, MS	. MS			
State Continue C	Samp	ling Date:	01-11-0	CAC Project No.		9397		City:	Gulfport	
More No.	Samp	ler:	וווו	CAC Project Desc	:ription:	Gulfport Fertilizer	Site	State:	MS	
Marker No. Service No. S				A CONTROL OF THE PARTY OF THE P	学生は自然のないので	Field Equipm	ent	THE RESERVE		THE PROPERTY OF THE PARTY OF TH
Serial No. Well Information Serial No. Well Information Serial No. Well Information Serial No. Well Information Serial No. Well Information Serial No.	pH Me	eter No.					Serial No.			
Turbuitity Weeter No. Weil Information White Change Cheering Cheer	Condi	uctivity Meter	r No.				Serial No.			
Well No. Well Wildle Top of Caning Top of Caning Top of Caning Top of Streen Without Top of Caning Top of Streen Teach	Turbk	dity Meter No					Serial No.			
Well No. Diameter Top of Casing Greety Top of Screen Boltzm of Screen Water Water Level Inches) Freety Free		No. of Persons in Control of the Persons in	の との	1 16 16		Well Informat	uo.		Control of the Contro	
World Casing Construction: Algebraic Column X (Wathar Column X and World Well Volume a Valer Column X and World World World Volume a Valer Column X (Wathar Column X and World World World Volume a Valer Column X (Well Volume a Valer Column X and Volume a Valer Column X (Well Volume a Valer Column X (Mulli)) Purged (Gallons): Well Volume a Valer Column X (Well Volume a Valer Column X (Mulli)) Well Volume a Valer Column X (Mulli) Purged (Gallons): Well Volume a Valer Column X (Mulli) Well Volume a Valer Column X (Mulli) Purged (Gallons): Well Volume a Valer Column X (Mulli) Well Volume a Valer Column X (Mulli) Purged (Gallons): Well Volume a Valer Column X (Mulli) Well Volume a Valer Column X (Mulli)		Weil No.	Well Diameter	Top of Casing Elevation	Ground Elevation	Top of Screen Elevation	Bottom of Screen Elevation	Water	Water Level Elevation	Water
Well Casing Construction: Calibration Tor Well Volume Well Multiplier 3.4" Well Calibration Tor Well Volume Well Volume = Volume		MW-6	2"	34.29	31.23	25.34	15.34	(reer)	(Feet)	(Feet)
Survitoline Survitoline Survitoline Survitoline Survitoline Survitoline Survitoline Survitoline Survitoline Survitoline Survitoline Survitorine	Well C	asing Const.	ruction:							7
Well Multiplier 2 - Well Volume = Well Multiplier 2 - Well Volume = We					(Water Co	Calibration for Well	1 Volume			
Well Yolume = Weter Column X			3/4" Well			2" Well			6" Well	
Well Volume a Valent Column X Well Volume = Valent Column X Well Volume x 3 (Gallons): Well Volume to be Purged (Gallons): Well Volume x 3 (Gallons): Well Volume x 3 (Gallons): Well Volumes x 3 (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Purged (Gallons): Min. Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Purged (Gallons): Min. Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Purged (Gallons): Min. Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Purged (Gallons): Min. Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Purged (Gallons): Min. Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Purged (Gallons): Min. Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Purged (Gallons): Min. Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons):	Well M	luttiplier.		0.023	Well Multiplier:		0.163	Well Multiplier.		1.469
Well Volumes X 3 (Gallons): Well Volumes X 3 (Gallons): Well Volumes X 3 (Gallons): Well Volumes to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Well Volume to be Purged (Gallons): Min. Volume to be Purged (Gallon	Well	olume = Wate Well Multiplin	er Column X ier (Gallons):		Well Volume = Wat Well Multipl	ter Column X lier (Gallons):	0	Well Volume = Wa	iter Column X toller (Gallons):	
Min. Volume to be Purged (Gallons): Min. Volume to be Purged (Gallons): Min. Volume to be Purged (Gallons): Sampsling Information Purged (Gallons): Sampsling Information Purged (Gallons): Sampsling Information Purged (Gallons): Sampsling Information Purged (Gallons): Callons Time Purged (Gallons): Purged (Gallons): Purged (Gallons): Callons Time	Well V	olumes X 3 (G	3allons):		Well Volumes X 3 (Gallons):		Well Volumes X 3	(Gallons):	
Time	Min. V	olume to be P.	urged (Gallons):		Min. Volume to be !	Purged (Gallons):	2,09	Min. Volume to be	Purped (Gallons):	
Time Time Purged Volume Fleid Conductivity Dissolved Fleid Conductivity Dissolved Fleid Conductivity Dissolved Fleid Conductivity Co.) (Min.)	Purgin	g Methodolo	.A.			Sampling Inform	1000			
Hr.Min Purged (Gallons) Temperature CC) (mSlcm) (ppm) pH Reduction (Hr.M.) (Min.) (Min.) (Ppm) (ppm) pH Potential (mV) (Hr.S.) CC CC CC CC CC CC CC		Time		Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
14:53 0 15:05 20 21:1 75:0 20 25:62 40 40 15:05 20:05 11:1 64:0 20:05 11:1 65:05 12:1 15:05 11:1 65:05 12:1 15:05 11:1 65:05 12:1 15:05 11:1 65:05 12:1 15:05 11:1 65:05 12:1 15:05 11:1 65:05 12:1 15:05 12:1 15:05 11:1 65:05 12:1 15	-	Hr:Min)	Purged (Min.)	(Gallons)	Temperature (°C)	(mS/cm)	Oxygen	Hď	Reduction Detartial (m)	Turbidity
15:05		4.52	0						L CIGHTON (NIA)	(NIN)
15.04 62 21.3 96.1 192 5.54 2.15 15.12 5.24 2.2 2.25 1.15 63.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2		50.5	A STATE OF THE PARTY OF THE PAR	2.5	7.1.7	ı,	0 स	7	C.C	TI CIN
15:13 5:23 5:24 5:25 5:25 5:25 5:25 5:25 15:28 15:28 15:28 15:28 15:28 15:28 15:28 15:28 15:28 15:29 15:21 15:28 15:21 15:28 15:29 15:29 15:20 15:21 15		7.	69	3.0	21.2	1.37	120.	いいけ	- 4	1
15:24 5:25	,	5:13		2,5	1.1.	000	1	ハバダ	۲	6
15:72 55.2 51.1 63.5 51.21 5.52 5.51 15:73 5.55 1.11 63.0 5.12 5.55 1.21		17		4.0	71.1	274	22	4.74	7	-10
15:28 51.2 49.0 .25 51.21 15:28 6.0 21.11 93.0 .25 1.25	7	× . Zt		40	71.	62.5	'n	1 10	٧٧	'n
15:28 6.0 21.1 930 :24 5.55 12	7	7.78		#\ V	2112	950	,25	5.55	11	4
2) 25 42: 630 : 24 5.5 1.5	Ţ	J.		,		-				
		-		0.0	1./2	200	126	N. Carlo	(3	4

	21.4.10	. (CAC Project No.		9397		City:	Gulfport	
Sampler:	إ	CAC Project Description:	ription:	Guffront Fertilizer Site	Site	State	MC	
THE STATE OF THE S	THE PROPERTY OF STREET		というない 一人の一人の	Field Equipment	Britan Control Control			PARTITION OF THE PARTY OF THE P
pH Meter No.					Serial No.			
Conductivity Meter No.	er No.				Serial No.			
Turbidity Meter No.	Ö.				Serial No.			
TO STATE OF THE PARTY OF THE PA				Well Information	ion			6
Well No.	Weil	Top of Casing Elevation	Ground	Top of Screen Elevation	Bottom of Screen	Water	Water Level	Water
	(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
L-WM	2".	33.48	30.75	24.54	14.54	ふれ	186.03	9,210
Well Casing Construction:	struction:							
			Water Co	Calibration for Well Volume	I Volume			
	3/4" Well			Z" Well	Consideration with the same of		6" Well	
Well Multiplier:		0.023	Well Multiplier.		0.163	Well Multiplier:		1 489
Well Volume = Water Column X	ter Column X		Well Volume = Water Column X	er Column X		Well Volume = Water Column X	er Column X	201
Aven Munit	Wen montplier (Senoris).			well wumpher (Gallons):	O	Well Multi	Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons).	Gallons):			Gallons):	7-70	Well Volumes X 3 (Gallons):	Gallons):	
Min. Volume to be Purged (Gallons):	Purged (Gallons):	•	Min Volume to be F	Volume to be Purged (Gallons):	21.4	Min. Volume to be Purged (Gallons):	ourged (Gallons):	
Purging Methodology:	oerc			Sampling information	ps() uotum			
Time	Time	Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	CFleid
(Hr:Min)	(Min.)	(Sanoins)	(°C)	(mS/cm)	Oxygen (ppm)	Ŧ	Reduction Potential (mV)	Turbidity (NTU)
14:07)					
14:15	9		Z. E.C.	50.6	140	St. V.	ئ	PC 04
にとしてい			せ. こと	7,61	6.55	11.00	10)	V. C. O. O.
I)	76		6. C.C.	けるコ	80.00	-	200	00/00
7			e.64	9.57	2.24	アピル	たが	0.0
14,35			92,1	፣ ሴተገ	でい	N. 155	7	J. 1-0
14:21			72.1	6) "Jh	5] ⁴ ©	イナン	27	6.0 K
* 14.7	3.43	リルなな		D 03				
,								
			١			-		

125			T	廳			_	200		_	_	100	200	Т									_					21818		-20					
	3							MITTER	Column	(Feet)		2.2		007,	1.469					Field Turbidity	(NTU)	8	0	0.4	\v		17	1							Page 1 of 2
2				STATE OF THE STATE						-	1				-	+	-	-	-	-							ľ				L				Pad
) \	Guffoort						Minton I awad	Elevation	(Feet)	9-			6" Well	olumn X	(Gallons):	d (Callone)			Reduction	Potential (mV)	42	25	122	1	24	200	150	60						
	s/	ē	MS							4	(Sept Head		Water Co	weil Mulliplier (Gallons):	o he Pume				-	+			2			+	+			H	\dashv		
	3/	City City	State:					Water	Level	(Feet)	-			IAfall Rd. Hinday	Well Volume = Water Column X	Weil Millimes X 3 (Calloos):	Min. Volume to be Purned (Callone)		7.412	B #d		1.11.11	ı L	Į,	2.0	60.0	9.0	70 4	24.5						
	5							Serson	flon	a (3		HipHer)	53	000	2 14	V. V.		pon	D US 1		7	4	8	4	-	2	1	2						
	Well Sampling Field Data Sheet Covington and Associates Corporation Pass Christian, MS		Site	hent	Serial No.	Serial No.	Serial No.	Bottom of Screen	Elevation	(Feet)	D. C.	Il Volume	(Water Column, in Feet X 7.481 X Well Multiplier)	0.163	120		0,0		Dissolved	Oxygen	(mdd)	7-1	V.	3	4	Ġ,	کر	16				1			
	Well Sampling Field Data Sheet Ington and Associates Corporal Pass Christian, MS		Gulfport Fertilizer Site	Field Equipment			Se	Top of Screen	Elevation		19.60	Calibration for Well Volume	in Feet X 7.4	t weil	mn X		(Gallons):	Sampling Information	Conductivity	An anapolic	(mayem)	6.3	21.12	08.4	825	20.00	20	25.)						
	Well Si ovington	9397	Gulf					1		\downarrow	Ψ	Callb	Column		Nume = Water Column X	3 (Gallons	be Purged	Sa	2		-				,	أم						_	\downarrow		
	J		ption:					Ground	Elevation	(Leer)			Wate	Well Muttiblier	Well Volume = Water Column X	Well Volumes X 3 (Gallons):	Min. Volume to be Purged (Gallons):		Field	Temperature	6	1.06	70.6	70°7	1.02	70.7	70.	70.					X	\	^
		ect No.	CAC Project Description					Casing	= 1	V.	22 56			0.023					Volume	(Gallons)	0	1	0	5	2		0	ſ	-4				1		
)	CAC Project N	CAC Pro	Constitution of the last			MANAGEMENT STORY	Top of Casir	Vela		00			Ö					Purged Volum	(Gall		12	33		9.0	0	, 5	17	J					1	
3000	0 1	12/2011	777			d	The property of the last	Well	Diameter	9"			3/4" Well		olumn X Gallons):	ons):	Min. Volume to be Purged (Gallons):		Time	Purged (Min.)													\setminus	nlciem:	
	مس سرع	ate: (2/	万打	4		y Meter N	200	0	1	V	Construc		Section of the least	<u>ا</u>	tume = Water Column X Well Multiplier (Gallons)	s X 3 (Galle	to be Purg	hodology			D1819	2112	35	20	0	52	Ż	36			+	-		Field Tech	
July (62	Sampling Date:	Sampler:	N. Market	pri meter 160.	Conductivity Meter No.	al Corporation	Well No.		R.W.R.	Well Casing Construction:			Well Multiplier:	Well Volume = Water Column X Well Multiplier (Gallons)	Well Volumes X 3 (Gallons):	in. Volume	Paraine Methodolony:	Time	(Hr:Min)	2	170	2	120	12	7	77	12	ب					Signature of Field Technician:	
Oct a	1.5		ωJ		al (<u>۱ ۱</u>				7	کا			3	S		~	1		1								4	2				L	S	
	. § c	F															J. Con low	1, (A) (A) (A) (A) (A) (A) (A) (A) (A) (A)	, /	S S S S S S S S S S S S S S S S S S S	2/1 <u>2</u>						+	<u> </u>	<u>ک</u>	{					
																	\ <i>\</i>			(>	-)						

Well Sampling Field Data Sheet Covington and Associates Corporation

	1			Pass Christian, MS	istian, MS				
Sampling Date:	(107) 31	_		9397		Cfty:	Gulfport		_
Sampler: (C.)	+100	CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	MS		
				Fleid Equipment		The second second second			
pH Meter No.					Serial No.				-
Conductivity Meter No.	No.				Serial No.				T
Turbidity Meter No.		ų.			Serial No.				-
		The state of the s		Well Information	uo				
Well No.	Well Diameter	Top of Casing Elevation	Ground	Top of Screen Elevation	Bottom of Screen Elevation	Water	Water Level Elevation	Water	
NAMA.9	2000	22.64	(reet)	(reet)	(Feet)	(Feet)	(Feet)	(Feet)	
Well Casing Construction:		77.04		26.13	6.13	4.47	1 7.67	11.56	
	では、			Calibration for Well Volume	Volume				
			(Water Co	(Water Column, in Feet X 7.481 X Well Muttiplier)	1 X Well Multiplier)				
Africa Andrews	3/4" Well			2" Well			6" Well		عدي.
well Multiplier: Well Volume = Water Column X	Column X	0.023	Well Multiplier:	Y Column Y	0.163	Well Multiplier.		1.469	
Well Multiplier (Gallons)	(Gallons):		Well Multipl	Well Multiplier (Gallons):	11.56	well volume = wat	ıme ≃ water Column X Well Multiplier (Gallons):		
Well Volumes X 3 (Gallons):	illons):		Well Volumes X 3 (Gallons):	3allons):	1.88	Well Volumes X 3 (Gallons).	Gallons):		
Min. Volume to be Purged (Gallons):	rged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	Ŋ	Min. Volume to be Pumed (Gallons)	Pumed (Gallone)		
Purging Methodology:	2			Sampling Information			(compo) con		
Time	Time	Purged Volume	Field	Conductivity	Diseasing	1000			
	Purged	(Gallons)	Temperature	CONTRACTANTA	Oxygen	PHd	Oxygen	Turbidity	
(HIT:MIII)	(Min.)		(<u>)</u>	(mS/cm)	(mdd)		Potential (mV)	(NTU)	
1 080	2	0						12-21 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	トタト
A I		2.0	23.0	0.126	0,7.V	700.0	200	4.	1
		7.5	23,6	Q.115	143	7.7.	001	+	255
		2.0	33 · Q	8710	Q.63	27.76	811	02 7 7 78	•
13:03		3.5	23.66	0,130	85'0		108	h 8	
13:00		0.0	23.4	0.131	0.39	4.92	500	80.0 608	
- 1 1		9.5	F. E.C.	0,131	6.37	5,99	7	7	
15:10		5,0	22.0	£\$1.0	0.30	70.7	65	0.1 7.60	
2:5:		5.5	0.ec	5,132	0.33	50'5	N	0	
	Š	٥	23.0	0.13.2	CE'W	71.14	רות	0,0	
01:51 %	SAM	アトドー							1
	1	1							
Signature of Field Technician	hniciap								
	J	'	\						
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Page 1 of 2

Sampling Date: 0/	01/5/	CAC Project No.		9397		City:	Gulfport	
Sampler: C/+	707	CAC Project Descr	Description:	Guifport Fertilizer Site Field Equipment	Site	State:	MS	
pH Meter No.					Serial No.			
Conductivity Meter No.	No.				Serial No.			
Turbidity Meter No.					Serial No.			
		Post of the Colon		Well Information	oo		No. of the Control of	
Well No.	Well Dlameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation	Top of Screen Elevation	Bottom of Screen Elevation	Water	Water Level Elevation	Water
MW-10	2"	27.69		19.73	(reat)		(reet)	(Feet)
Well Casing Construction:	Jetlon:						45.10	7 - 7
				Calibration for Well Volume	Volume	STANDARD CONTRACTOR		
	3/4" Well		(Water Co	(Water Column, in Feet X 7.481 X Well Muttiplier)	1 X Well Multiplier)			
Wall Multiplian		0.000	24 201 24 10 24 10	Z Weil			6" Well	
Well Volume = Water Column X Well Multiplier (Gallons):	Column X r (Gallons):	0.023	Well Volume = Water Column X Well Volume = Water Column X	iltplier. Iume = Water Column X Well Multiplier (Calloce)	0.163	Well Multiplier: Well Volume = Water Column X	ler Column X	1.469
Well Volumes X 3 (Gallons):	illons):		Well Votumes X 3 (Gallons):	Ballons):	200	Well Wolfres X 2 (C-11-12)	Well Muliplier (Gallons):	
Min. Volume to be Purged (Gallons).	rged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons).	70.7	Min Volume to be Breeze (Online)	Calloris).	
Purging Methodology:	7.5	R. Carlotte		Sampling Information	ation		uged (Galibiis).	
Time	Time	Purged Volume	Field	Conductivity	Discolude	7710		
(Hr:Min)	Purged (Min.)	(Gallons)	Temperature (°C)	(mS/cm)	Oxygen (man)	Hd.	Reduction	Field Turbidity
1435		9			(1,1,1)		rotental (mv)	(S)
1 6442		2.0	21.0	4 5	17.7.1	2.70	707	120
60%		3.0	71.7	0.00	1,00	4.40	120	250
1949		3.5	21.9	يرا	1.22	5.74	25,5	\ \G
1952		9.0	71.9	7.3	/ / /	200	147	00
452		4.5	21.4	7.3	1.03	14.4	2+6	-
458		5.0	21:0	1.5	1.00	14.00	1002	0
15/2		55	7.1.9	7,4	6000	3.71	202	B
	Collected	5000 a						
		D						
Plane		-		•				

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> Well Sampling Field Data Sheet Covington and Associates Corporation

				Pass Christian, MS	, MS				
Sampling Date: 📞	01:51.	CAC Project No.		9397		City:	Gulfoort		Γ
Sampter:	オと	CAC Project Desc	Description:	Guffport Fertilizer Site	Site	State.	MC		T
STATE OF THE PARTY			がある。 名の名の名の名のののののののののののののののののののののののののののののの	Field Equipment	ont	E MINTER DOWNERS IN		ALTERNATION OF THE PROPERTY OF	
pH Meter No.					Serial No.				Г
Conductivity Meter No.	No.				Serial No.				T
Turbidity Meter No.					Serial No.				Т
140. 00 AV				Well Information	uo				
Men No.	Well Dlameter	Top of Casing Elevation	Ground	Top of Screen Elevation	Bottom of Screen Elevation	Water Level	Water Level Elevation	Water	Г
Anak 44	(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	Ē,			T
Well Casing Construction:		24.03		15.05	5.05	4 6 0	18,88	13.83	Ţ
			Constan C	Calibration for Well Volume	Volume				
	3/4" Well		- Constitution	2" Well	A Well Millipher)		Act black		
Well Multiplier:		0.023	Well Multiplier		0.463	Marit Advittinizace	o Well		7
Well Volume = Water Column X Well Multiplier (Gallons):	r Column X ar (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons)	ume = Water Column X Well Multiplier (Gallons):	7 4	Well Volume = Water Column X Well Well Multiplier (Cellons	pher: me = Water Column X Well Multiplier (Gellons)	1.469	
Weil Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons):	Gallons):		Well Volumes X 3 (Gallons)	Gallons)		Т
Min. Volume to be Purged (Gallons):	urged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	ر بر و	Min. Volume to be Purged (Gallons)	Purged (Gallons)		Т
Parging Methodology:				Sampling information	ation				Political
a Eliza	Time	Burney Wolumb		2 17			The second secon	CONTRACTOR OF THE PARTY OF THE	133
(Hr.Min)	Purged (Min.)	(Gallons)	Temperature	Conductivity	Dissolved Oxygen	Field	Oxygen	Field Turbidity	
I AVI				(112)	(mdd)		Potential (mV)	(NTU)	
13,37	3		7	00110	8,48	3,85	901	7	_
15:51	2,5		20,9	(C)	0.51	3,50	101		\leq
15.54	25.C		311	0,10t	1,23	5.02	163	986 7 65	11 -
2,56	5		31.5	7	871)/3,	
7	۔ ا د		_		09,1	3.9(83	2011 hts	_
	71		21.3	1	1.40	2,99	021	5. 1863	
67:50	1 V C		4.	0, (0	0,65	3,22	136	1 218	
12 44	אַר. אַר		9111	0.100	0.66	3,25	125	673	
X 14. 148	A X X	3 10	1.12	0),(0)	0,45	5 ነላሪ	7-1	202	
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Page 1 of 2

Signature of Field Technician:

Sampler: LL								The second secon	
Sampler.	16	CAC Project No.		9397		Clfy:	Gulfport		COO-
The state of the s	+1	CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	MS		T
			のできる はない できる できる できる できる できる できる できる できる できる できる	Field Equipment	ant		THE REAL PROPERTY OF THE PERSON NAMED IN		- Control
pH Meter No.					Serial No.				
Conductivity Meter No.	No.				Serial No.				T
Turbidity Meter No.					Serial No.				1
7	COCONSTRUCTION OF THE PARTY OF		STATES AND AND ADDRESS OF THE PARTY OF THE P	Well Information	non				1
Well NO.	Well	Top of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water	
	(Inches)	(Feet)	(Feet)	Elevation (Feet)	Elevation (Feet)	Level	Elevation	Column	
MW-12	2	28.92		20.95	40 95	1 C	(Leen)	(Feet)	_
Well Casing Construction:	iction:				6:31	4	195.6	14	<u> </u>
				Calibration for Well Volume	Volume				
(Canada Tanada		Action of Store of State	(Water Co	(Water Column, in Eest X 7.481 X Well Multiplier)	11 X Well Muttiplier)				
A 14. 14. 15. 15.	3/4" Well			2" Well			6" Well		
vveli muliipiier.		0.023	Well Multiplier:		0.163	Well Multiplier:		1 ARD	Т
weii volume = water Column X Well Muttiplier (Gallons):	Column X (Gallons):		Well Volume = Water Column X Well Multinier (Callors)	Nume = Water Column X		Well Volume = Water Column X	iler Column X	SOL.	T
Well Volumes X 3 (Gallons):	llons):		Medi Volumer V 2 (Carller)	Jeffers.	000	Well Mul	well multiplier (Gallons):		_
Min. Volume to be Purped (Gallons):	med (Gallone):		Vici Volunica A 3 (Sanons).	20.00	Well Volumes X 3 (Gallons):	(Gallons):		_
	Bor (Cellolle).		Min. Volume to be Purged (Gallons):	urged (Gallons):	10145	Min. Volume to be Purged (Gallons):	Purged (Gallons):		
Purging Methodology:				Sampling Information	ation				Time
Time	Time	Purged Volume	Field	Conditothille	Distantia di				
(Hr.Min)	Purged	(Gallons)	Temperature	Collegenerity	Oxygen	Bet	Oxygen Reduction	Field	
	(18811.)		(2)	(mS/cm)	(mdd)		Potential (mV)	(NTI)	
130.54	- 1								44
70:01	2,0		A3.2	9.11	07.0	4.39	27	ء د	
70.71	2,5		-	0	5.37	62.7	S. C.	202	シャター
14:06	3.0		7.5%	7.5	4.8.4	7 -	2=	7 -	<u>/</u>
14:08	ک: ح		0,22	7, 77	770	200	2-1-	77 64	
14,10	4.0		22,0	2,0	1/2/0	17.00	91	38 48 6	
14:12	ひ:カ		22.9	19.2	6.24	12.02	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	25 25	
14:14	5.0		73.9	7.85	0 23	27 1/		\$\frac{3}{2}	
31:41	۸.۶		73.9	0,10	77,0	37.7	7	25. 25	
147	6.6		Sig	70.	64 E	200	30,	100 Sell	
14:30 14:30	5 4 4 5 1 S	1 27	11		77.7	00.1		1 540	
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Signature of Field Technician:	hnician:	インハイ	9						

Well Sampling Field Data Sheet Covington and Associates Corporation Pass Christian Mc

T Sithes) X Well T T T T T T T T T	Color Project Description:	Sometime Order	Childra			Pass Christian, MS	n, MS	1 200				
CAN Project Description: Guilport Facilities State State: Misses	CAC Project Description: Guilport Fertilizer State State: Miss	-	200	CAC Project No.		9397		CH.	Guiffoort			
Serial No. Ser	Serial No. Ser	- 8	177.1	CAC Project Desc	ription:	Gulfport Fertilizer	Site	State	Me			
Senial No. Sen	Seriel No. Ser	A SIGNATURE AND A SIGNATURE AN		NOT THE REAL PROPERTY.	THE RESERVE OF THE PERSON NAMED IN	Field Equips	nent		2			
Serial No. Ser	Serial No. Ser	H Meter No.					Serial No.				The state of the s	
Feet Top of Casing Ground Top of Seren Water Level Water Level Feet) Feet F	Top of Casing Ground Top of Series Water Water Level Water Level Water Level Water Level Water Level Column Casing	onductivity Meter	.No.				Sarial No.					
Top of Casing Ground Top of Streen Water Level Water Level Top of Casing Ground Top of Streen Green Green Green Ground Top of Streen Green Top of Casing Ground Top of Gardin Weter Water Level Head Top of Casing Ground Top of Casing Ground Top of Casing Ground Top of Gardin Ground Top of Casing Ground Grou	urbidity Meter No.					Contact No.						
The state Top of Casing Ground Top of Screen Bottom of Screen Heaviton Level Elevation Column Fleet) Elevation Elevation Elevation Elevation Elevation Elevation Elevation Elevation Column Elevation Column Fleet) Top of Screen Elevation Column Fleet) Top of Screen Elevation The state Top of Screen Elevation The state Top of Screen Elevation Top of Screen Top of Screen Elevation Top of Screen The continue The	Mali No.			A THE TANK THE PROPERTY OF	WellInforms	Don House						
Teach Teac	The state The		Diameter	Top of Casing	Ground	Top of Screen	Bottom of Screen	L	Water Level	- All	200	
Calibration for Well Volume Calibration for Well Volume Calibration for Well Volume Calibration for Well Wolume Calibration Calibrat	California Cal		(Inches)	(Feet)	(Feet)	Elevation	Elevation	Level	Elevation	Cole	Ē	
Calibration for Well Volume Calibration for Well Multiplier Calibration for Well Multiplier Calibration for Well Multiplier Calibration Calibrat	Calibration for Well Wuitplier; Calibration for Well Well Well Wuitplier; Calibration for Well Well Well Well Well Well Well Wel	MW-13	2"	32.36		24.30	74.20	. I W	(Feet)		S.	
Calibration for Well Numbles Calibration for Well Multiplier Calibration for Well Multiplier Calibration for Well Well Multiplier Calibration Ca	Well Noting Calibration for Well Multiplier Calibration for Well Multiplier Calibration for Well Multiplier Calibration Calibratio	fell Casing Constr	uction:				14.30		D: 970	0	SH SH	
Well Well Multiplier: Well Well Wultiplier: Sampling Information Co.163 Well Wultiplier: Well Wultiplier: Well Wultiplier (Gallons): Well Wul	Well Volume Well Volume					Calibration for Wel	Il Volume					
1.469 Well Multiplier Calions Well Multiplier Calions Well Wolume = Water Column X Calions Well Wolume = Water Column X Well Wolume = Water Column X Well Wolume = Water Column X Well Wolume = Water Column Well Wolum	Weller Column X Well Multiplier; Well Williplier; Callons; Well Williplier; Callons; Well Williplier; Callons; Well Williplier; Callons; Well Williplier; Well Williplier; Callons; Well Wolume to be Purged (Gallons; Callons; C		3/4" Well		(water.C	olumn, in Feet X 7.4	81 X-Well Multiplier)					
Well Volume = Vater Column X	Well Volume = Water Column X	Vell Multiplier:		0.023	Well Multiplior	z Weil			8" Well			
		Vell Volume = Water	Column X		Well Volume = War	ter Column X	0.163	Well Multiplier:		1.4(6	
Purged Volume to be Purged (Gallons): Well Volumes x 3 (Gallons): Sampling information Sampling informatio	Well Volumes X 3 (Gallons): Well Volumes X 3 (Gallons): Surnpling information Surnpling Surnpling information Surn	Weil Multiplie	r (Gallons).		Well Multip	iler (Gallons):	J. J.	well volume = wa	ter Column X Inlier (Gallone)			
Purged Volume to be Purged (Gallons): Sumpling Information Sumplies Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sumpling Information Sum	Purged Volume Description Field Conductivity Dissolved Field Conductivity Conductivit	A 3 (G	allons):		Well Volumes X 3 (Gallons):		Well Volumes X 2	Cellece):		T	
Purged Volume Field Conductivity Dissolved Field Conductivity Dissolved Field Conductivity	Purged Volume Field Conductivity Dissolved Field Daygen Purged Volume Field Conductivity Dissolved Field Daygen Purged Volume Tenduction Conductivity Cond	in. Volume to be Pt.	rged (Gallons):	,		Purged (Gallons):	ア・サバ	Men Volume to be	Gallons):			
Purged Volume Field Conductivity Dissolved Field Dissolved Field Conductivity Dissolved Field Conductivity Conductivi	Purged Volume Field Conductivity Dissolved Field Dissolved Field Conductivity Dissolved Field Potential (my) William Conductivity	inging Methodolog	975			Sampling Inform	100	will volume to be	ruged (Gallons):			
Callons Temperature Considering Callons Temperature Considering Consider	Gallons Temperature Congern	Time		Purged Volume	Field	Conductivity						
7 2.2 22.3 .48 4.56 714 11 8.5 22.5 2.4 68 2.5 2.5 2.4 68 2.5 2.5 2.5 2.4 68 2.5 2.5 2.5 2.4 68 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5	7 2.2 22.3 .48 4.56 219 11 8.5 3.5 3.4 6.5 3.7 4.05 3.5 3.4 6.5 3.7 4.05 3.5 3.1 12.5 0.3 11 4.05 3.5 3.4 6.5 3.7 4.05 3.5 3.1 12.5 0.3 11 4.05 3.5 3.0 0.0 5.6 5.5 3.5 0.0 1.3 0.0 1.3 0.0 5.6 5.5 3.5 0.0 1.3 0.0 1.3 0.0 5.6 5.5 3.5 0.0 1.3 0.0 1.3 0.0 5.6 5.5 3.5 0.0 1.3 0.0 1.3 0.0 1.3 0.0 5.6 5.7 1.5 0.0 1.3 0.0 1.	(Hr:Min)	Purged (Nin.)	(Gallons)	Temperature	A LONG TO THE LONG	Oxygen	Hd	Oxygen Reduction	- Fiel		
7 2.5 22.3 .98 4.56 219 11 3.5 23.3 20.8 4.35 244 659 344 659 311 4.05 253 0.0 5 4.6 23.7 13.5 0.77 4.08 253 0.0 5 5.0 23.1 13.5 0.77 4.08 253 0.0 5 5.5 23.1 13.5 0.77 4.08 253 0.0 5 5.5 23.1 13.5 0.77 4.04 249 0.0 5 5.5 25.1 7.5 0.77 4.04 249 0.0 5	2 2 22.3 .98 4.56 216 116 2.55 2.65 2.65 3.55 0.81 4.35 2.35 3.44 6.59 3.55 0.37 4.35 2.44 6.59 3.55 0.0 2.77 4.08 2.55 2.0 2.0 2.77 4.08 2.55 2.0 2.0 2.0 2.0 2.0 2.0 2.0 2.0 2.0 2.0	51:86				(ms/cm)	(mdd)		Potential (mV)	NTI (NTI	₹,	
3.0 82.7 4.54 7.86 7.64 14.87 3.88 746 659 3.10 0.0 12.5 0.0 17.0 0.77 4.08 25.7 244 659 2.5 2.5 25.5 25.5 25.5 25.5 25.5 25.5	2 5 83.3 20.8 0.81 4.35 244 659 344 659 34.5 5.5 23.3 17.0 0.77 4.03 254 0.0 5.7 4.03 25.3 0.0 5.5 5.5 23.1 17.5 0.77 4.03 25.3 0.0 5.5 5.5 25.1 17.5 0.77 4.03 25.3 0.0 5.5 5.5 25.1 17.5 0.77 4.03 25.3 0.0 5.7 5.5 5.5 25.1 17.5 0.77 4.04 249 0.0 5.7 17.5 0.77 4.04 249 0.0 5.7 17.5 0.77 4.04 249 0.0 5.7 17.5 0.77 17.0 0.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5	6:30		25	- 1	- 1	5				Ì	工工
2-5 23.2 17.0 0.77 4.05 244 659 34, 4.05 23.2 0.0 5.77 4.08 25.7 11.0 0.077 4.08 25.7 0.0 5.5 25.0 0.0 5.5 25.5 25.7 11.5 0.0 5.7 4.08 25.7 0.0 5.5 25.5 25.7 1.5 0.0 5.7 4.04 249 0.0 5.5 25.5 25.0 5.0 5.0 5.5 25.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0	2-5 23.2 20.8 0.77 4.25 244 659 3.10 2.2 244 659 3.10 2.2 244 659 3.10 2.2 24.11 2.5 24.1 2.5 24.11 2.5 2.0 2.5 2.0 2.5 2.5 2.0 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5	8:32			J.	٠.	200	4.20	212	1/		ĺ
4,6 23.7 17.0 0.77 4.11 25.7 11.0 4.05 3.44 659 3.1 12.5 0.17 4.08 25.7 11.0 4.08 25.7 11.0 4.08 25.5 2.0 6.77 4.08 25.7 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5	4,6 23.7 17.0 0.77 4.11 25.7 1.6 4.6 3.7 1.6 4.6 3.3 1.6 4.6 3.3 1.6 6.7 4.03 25.7 1.6 6.7 4.03 25.7 1.6 6.7 4.03 25.7 1.6 6.7 4.03 25.7 1.6 6.0 5.7 5.5 20.0 5.7 4.04 24.0 5.7 1.5 6.7 4.04 24.0 5.7 1.5 6.7	000		1	2000	4	0.81	4.37		166	% 0 0	
4.5 33.1 13.5 0.77 4.08 253 0.0 6 5.5 25.1 7.5 0.77 4.08 253 0.0 6 5.5 25.1 7.5 0.77 4.08 253 0.0 5 5.5 25.1 7.5 0.77 4.08 253 0.0 5 5.5 25.1 7.5 0.77 4.08 253 0.0 5 5.5 25.1 7.5 0.0 5 7.0 2.7 2.5 2.5 0.0 5 7.0 2.7 2.7 2.7 2.7 2.7 2.7 2.7 2.7 2.7 2.7	4,5 33.1 13.5 0.77 4.08 25.7 5.0 6 5.0 22.1 7.5 0.77 4.08 25.2 0.0 6 5.5 25.1 7.5 0.77 4.08 25.2 0.0 6 5.5 25.1 7.5 0.77 4.08 25.2 0.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0	<u>∞</u>		1	2000	ď,	110		546		77.	
5.0 22.1 7.5 6.77 4.03 252 0.0 5. MPLE 5.5 25.1 7.3 6.77 4.04 249 6.0 5.	S.5 33.1 15.5 6.17 408 25.2 0.0 5. 5.5 35.1 7.5 6.17 403 25.2 0.0 5. MOLE 35.1 7.5 6.17 4.04 349 6.0 5. 12-2 461. @ MW-17 @ 68.48 6.15.10	7		1.	17,00	01	0.1	7.1	5S4	7 31	29	
MALE - 25:1 1.3 0.11 4.03 252 0.0 5. MALE - 25:1 1.3 0.17 4.04 249 0.0 5.	MOLE 35: 1 1.3 6.11 403 252 00 5. MOLE 349 0.0 5.	3		7	25.1	25.2	0.17		257	0,0	1 ~	
MALE - 349 60 51 12-2 tak. @ MW-12 @ 68:48 6.15.10	MALE - 25.1 7.5 6.77 4.04 249 6.0 5.17 1.2- 2 49 6.0 5.17 1.2- 21 4.04 249 6.05 5.10	77.00		71	45.1	.3	0,17	4.03	782	C	Ö	
12-2 tek. @ MW-12 @ 08:48 6.15.10	12-2 tak. @ MW-12 @ 08:48 6.15.10		0.27	1	35.1	7.3	しにり	20.	1 .	ч.	חני	
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12-2 tak. @ MW-12 @ 08:48 6.15	12-3 4xK. @ MW-12 @ 08:48 6.15									+	T	1
12-2 taking MW-12 @ 08:48 6.15	12-2 takin @ MW-12 @ 08:48 6.15										T	
12 CB (45 16:12	15 th CB 45 16.15	**	-411	7.1	V V V	0			2		Γ	
	Jaure of Field Technician:			34		7			27		()-	
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pH Meter No.	0	CAC Project No.		9397		- Par	1000		Γ
Meter No.	1	CAC Project Description:	ription:	Gulfoort Fertilizer Site	Site		Daliport		T
ineter No.				Field Equipment	nent	Side:	200		
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tide in the second of the seco					Serial No.				Τ
I ULDIUMY METOT NO.					Serial No.				Т
Well No	Weit		A STATE OF THE PARTY OF THE PAR	Well Information	hon		CONTRACTOR STATE S		7
	Diamoter	Top or casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	-	I
(Inc	(Inches)	(Feet)	(Feet)	Elevation	Elevation		Elevation	Column	
MW-14	2"	34.08		95.00	(reet)	(Feet)	(Feet)	(Feet)	200
Well Casing Construction:				20.03	15.83	22. 25	28,33	112.5	
		単語なる かかがる		Calibration for Well Volume	Volume				
		Section 19 Section 19	(Water Co	Water Column, in Fest X 7.481 X Well Muthinland	I X Well Multiplied				
3/4" Well	Well			2" Well					
veir muripiler.		0.023	Well Multiplier:		0.489		6" Well		
weii votume = Water Column X Well Multiolier (Gallons)			Well Volume = Water Column X	ar Column X	7,7	Well Volume = Water Column X	ater Column X	1.469	П
Well Volumes X3 (Calloon):			Well Multip	well Multiplier (Gallons):	16.5	Well Mul	Well Multiplier (Gallons):		
Volumes A S (Selloris).			Well Volumes X 3 (Gallons):	Ballons):	2.0	Well Volumes X 3 (Callons)	(Callone)		T
will. Volume to be Purged (Gallons):	lons):		Min. Volume to be Purged (Gallons):	'urged (Gallons):	1 7	Mis Velini	Compile).		Т
Purging Methodology:				Sampling Information	ation	I'mii. • Guille 10 De Purgeo (Gallons);	rurged (Gallons):		B
Time	2	Purged Volume	Elete			S. S. S. S. S. S. S. S. S. S. S. S. S. S			100
(Hr.Min) (Min.)	Jed J.)	(Gallons)	Temperature	Conductivity	Dissolved Oxygen	Field PH	Oxygen Reduction	J. Field	
		0	5	(ms/cm)	(bbm)		Potential (mV)	(NTU) A	Acaro MI
Q		1	- 6						Č
21.5		1,1	001	8.4	404	2.83	202	100	シー
7:15		7	30.2	8.1	484	1 - 4	100 N	<u>۱</u>	1.
98		32,0	C. C.	00		200	2000	1	IJ
1		4.0	4.66	ח ר	4 ~	2000			না
CC: 6		10.5	C . CC	70		27.7	015	0.0	
• 1		CV	1	7.	477	N N	31.5	0.012.20	_
130.6		1	1-40	4	4.57	3.78	25	0	1
		C, A	20.1	5	400	378	315	0,1 1,46	<u> </u>
9128 SA	0 Y	<u> </u>							_

APPENDIX B

Laboratory Analytical Report Sheets and

Chain-Of-Custody Forms



Tax I.D. 62-0814289

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.

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REPORT OF ANALYSIS

July 15, 2010

Project #: 9397.00

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

Sample ID

ESC Sample # : L464524-01

Date Received : 16, 2010 June Description Gulfport Fertillzer

Site ID : MW-13

Collected By

Collection Date : 06/15/10 08:48

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead	U U	0.0065 0.0065 0.0018	0.020 0.020 0.0050	mg/l mg/l mg/l		6010B 6010B 6010B	06/18/10 06/21/10 06/18/10	1
Lead, Dissolved	0.0046	0.0018	0.0050	mg/1	J	6010B	06/21/10	

 $\begin{array}{lll} U &=& ND & (Not \ Detected) \\ MDL &=& Minimum \ Detection \ Limit = LOD \\ RDL &=& Reported \ Detection \ Limit = LOQ = PQL = EQL \end{array}$

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

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REPORT OF ANALYSIS

July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-02

16, 2010 Date Received : June Description : Gulfport Fertillzer

Site ID :

Sample ID MW-14

9397.00 Project # :

Collected By Collection Date : 06/15/10 09:28

Parameter	Result	MDL	RDL_	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	U U U 0.0091	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/l mg/l mg/l mg/l		6010B 6010B 6010B 6010B	06/18/10 06/21/10 06/18/10 06/21/10	1

 $\begin{array}{lll} \texttt{U} &= \texttt{ND} & (\texttt{Not Detected}) \\ \texttt{MDL} &= & \texttt{Minimum Detection Limit} = \texttt{LOD} \\ \texttt{RDL} &= & \texttt{Reported Detection Limit} = \texttt{LOQ} = \texttt{PQL} = \texttt{EQL} \end{array}$

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REPORT OF ANALYSIS

July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-03

June 16, 2010 Gulfport Fertillzer Date Received :

Site ID :

Description

Project #: 9397.00

Sample ID A8-WM

Collected By 06/15/10 12:36 Collection Date :

Parameter	Result	WDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	U U U	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/1 mg/1 mg/1 mg/1		6010B 6010B 6010B 6010B	06/18/10 06/23/10 06/18/10 06/23/10	1 1

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD RDL = Reported Detection Limit = LOQ = PQL = EQL

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REPORT OF ANALYSIS

July 15, 2010

Site ID :

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-04

Date Received : 16, 2010 June Description Gulfport Fertillzer

MW-9 Sample ID

9397.00 Project # :

Collected By Collection Date :

06/15/10 13:14

RDL Units Qualifier Method Date Dil. Result MDL Parameter 0.020 0.020 0.0050 mg/1 mg/1 mg/1 6010B 06/18/10 0.0065 U Arsenic 6010B 06/23/10 U 0.012 0.0065 0.0018 Arsenic, Dissolved 6010B 06/18/10 Lead Lead, Dissolved 0.0080 0.0018 0.0050 mg/l 6010B 06/23/10

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD RDL = Reported Detection Limit = LOQ = PQL = EQL

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REPORT OF ANALYSIS

July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-05

Date Received : 16, 2010 June Description Gulfport Fertillzer

Site ID :

Sample ID MW-11

9397.00 Project # :

Collected By : Collection Date : 06/15/10 13:48

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic,Dissolved Lead Lead,Dissolved	U U 0.0081 0.015	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/l mg/l mg/l mg/l		6010B 6010B 6010B 6010B	06/18/10 06/23/10 06/18/10 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

July 15, 2010

Project #: 9397.00

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

Sample ID

ESC Sample # : L464524-06

Date Received : 16, 2010 June Description Gulfport Fertillzer

MW-12

Site ID :

Collected By : Collection Date :

06/15/10 14:20

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	U U 0.0044 U	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/l mg/l mg/l mg/l	J	6010B 6010B 6010B 6010B	06/18/10 06/23/10 06/18/10 06/23/10	1 1 1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL

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July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-07

Date Received : Description : June 16, 2010 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	Ū	0.0065	0.020	mg/l		6010B	06/18/10	1
Arsenic, Dissolved	Ü	0.0065	0.020	mg/l		6010B	06/23/10	1
Lead	Ū	0.0018	0.0050	mg/l		6010B	06/18/10	
Lead, Dissolved	0.0032	0.0018	0.0050	mg/l	J	6010B	06/23/10	1

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Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-08

Project #: 9397.00

16, 2010 Date Received June Description Gulfport Fertillzer

Site ID :

DUP-2 Sample ID Collected By

Collection Date : 06/15/10 00:00

Result RDL Units Qualifier Method Date MDL Parameter 6010B 06/22/10 6010B 06/23/10 6010B 06/22/10 0.0065 0.020 Arsenic mg/10.0065 U 0.020 0.0050 0.0050 mg/l mg/l mg/l Arsenic, Dissolved Lead 6010B 06/23/10 Lead, Dissolved 0.0018 1

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD RDL = Reported Detection Limit = LOQ = PQL = EQL

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REPORT OF ANALYSIS

July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-09

June 16, 2010 Gulfport Fertillzer Date Received : Description :

Site ID :

Sample ID MW-1

Project #: 9397.00

Collected By : Collection Date : 06/14/10 13:05

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	0.053 0.010 0.080 0.085	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/1 mg/1 mg/1 mg/1	J	6010B 6010B 6010B 6010B	06/22/10 06/23/10 06/22/10 06/23/10	1

Note:

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Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-10

Date Received : Description :

16, 2010 June Gulfport Fertillzer

Sample ID

MW-5

Site ID :

Collected By : Collection Date :

06/14/10 13:59

Project # : 9397.00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic,Dissolved Lead Lead,Dissolved	ט ט ט	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/1 mg/1 mg/1 mg/1		6010B 6010B 6010B 6010B	06/22/10 06/23/10 06/22/10 06/23/10	1 1 1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL

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July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-11

June 16, 2010 Gulfport Fertillzer Date Received : Description

Site ID :

MW-7 Sample ID

Project #: 9397.00

Collected By 06/14/10 14:38 Collection Date :

Parameter	Result_	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	0.011 0.010 U	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/l mg/l mg/l mg/l	J J	6010B 6010B 6010B 6010B	06/22/10 06/23/10 06/22/10 06/23/10	1 1 1

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD RDL = Reported Detection Limit = LOQ = PQL = EQL

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July 15, 2010

Project #: 9397.00

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

Lead, Dissolved

ESC Sample # : L464524-12 16, 2010

Date Received June Description Gulfport Fertillzer

Site ID : Sample ID MW-6

Collected By Collection Date : 06/14/10 15:25

Units Qualifier Method Result MDL RDL Date Dil. Parameter 6010B 6010B 6010B 06/22/10 06/23/10 06/22/10 0.022 1 Arsenic 0.0065 0.020 mg/10.0065 0.0018 0.020 0.0050 0.0050 mg/1 mg/1 mg/1 1 Arsenic, Dissolved 0.019 U

0.0018

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD RDL = Reported Detection Limit = LOQ = PQL = EQL

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July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-13

Date Received : 16, 2010 June Description Gulfport Fertillzer

Site ID :

Sample ID MW-3 Project #: 9397.00

Collected By : Collection Date : 06/14/10 16:10

Parameter	Result	MDL	RDL_	Units	Qualifier	Method	Date	Dil.
Arsenic	Ü	0.0065	0.020	mg/l		6010B	06/22/10	
Arsenic, Dissolved	Ū	0.0065	0.020	mg/l		6010B	06/23/10	
Lead	Ū	0.0018	0.0050	mg/l		6010B	06/22/10	
Lead. Dissolved	0.0031	0.0018	0.0050	mq/l	J	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 # : L464524-14

Date Received : June

Site ID :

16, 2010 Description Gulfport Fertillzer

Project # : 9397.00

Sample ID

DUP-1

Collected By Collection Date :

06/14/10 00:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	0.053 0.0075 0.078 0.090	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/1 mg/1 mg/1 mg/1	J	6010B 6010B 6010B 6010B	06/22/10 06/23/10 06/22/10 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

July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-15

Date Received : Description : 16, 2010 June 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 Arsenic, Dissolved Lead Lead, Dissolved	0.014 U 0.0042 0.015	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/l mg/l mg/l mg/l	J	6010B 6010B 6010B 6010B	06/22/10 06/23/10 06/22/10 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

July 15, 2010

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

ESC Sample # : L464524-16

June 16, 2010 Gulfport Fertillzer Date Received : Description

Site ID :

Sample ID MW-4

Project # : 9397.00

Collected By 06/15/10 07:40 Collection Date :

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead. Dissolved	0.019 0.013 U 0.0071	0.0065 0.0065 0.0018 0.0018	0.020 0.020 0.0050 0.0050	mg/l mg/l mg/l mg/l	J J	6010B 6010B 6010B 6010B	06/22/10 06/23/10 06/22/10 06/23/10	1

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD RDL = Reported Detection Limit = LOQ = PQL = EQL

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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	ī
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
1404524 15	WG484127	SAMP	Lead	R1263208	J
L464524-16	WG484127	SAMP	Arsenic	R1263208	J
T404254=10	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,

Chain of Custody	Page Col.		*ESC	12065 Lebanon Road	Phone: (800) 767-5859	Phone: (615) 758-5658 Fax: (615) 758-5659	F226	Without CO. MASSOC Consumption	A A A A A A A A A A A A A A A A A A A	D. C.	Remarks/Contaminant Sample # (lab only)	JULY LET TO THE TOTAL	59	L465 837 -01 -04	20 20	90	1	
Analysis/Container/Preservative				Z > E(_		HIW0		18d / d	Valic		N X			X X		XX	
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COVINGTON CIVIL & ENVIRONMENTAL, LLC

14257 DEDEAUX ROAD SUITE B GULFPORT, MS 39503 PHONE FAX E-MAIL (228) 396-0486 (228) 396-0487 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

February 23, 2010 Page 2

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° 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° 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

February 23, 2010 Page 3

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

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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.

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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

February 23, 2010 Page 6

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.

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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.

Senio Geologist

ohn F. Szabo, P.E

Principal

ENCLOSURES

cc: Mr. T

Mr. Tony Russell, OPC - MDEQ

Mr. Delma Powell, Hancock Bank

LIST OF TABLES

Groundwater Elevations

Historical Groundwater Sampling Events Former Gulfport Fertilizer Site Gulfport, MS

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24.37 21.52 22.41 24.37 24.41 25.79 26.07 25.1 25.95 26.22 27.00 28.39 27.53 25.58 27 26.3 27.9 28.37 23.61 20.99 21.84 23.35 23.89 25.09 3.92 4.59 5.16 2.95 4.01 3.28 26.12 23.49 24.72 25.69 26.43 27.49	5	26.23	23.65	25.17	26.13	27.00	28.34	28.83
26.07 25.1 25.95 26.22 27.00 28.39 27.53 25.58 27 26.3 27.9 28.37 23.61 20.99 21.84 23.35 23.89 25.09 3.92 4.59 5.16 2.95 4.01 3.28 26.12 23.49 24.72 25.69 26.43 27.49	7	24.37	21.52	22.41	24.37	24.41	25.79	25.6
27.53 25.58 27 26.3 27.9 28.37 23.61 20.99 21.84 23.35 23.89 25.09 3.92 4.59 5.16 2.95 4.01 3.28 26.12 23.49 24.72 25.69 26.43 27.49	12	26.07	25.1	25.95	26.22	27.00	28.39	28.27
23.61 20.99 21.84 23.35 23.89 25.09 3.92 4.59 5.16 2.95 4.01 3.28 26.12 23.49 24.72 25.69 26.43 27.49	Max. Elevation	27.53	25.58	27	26.3	27.9	28.37	29.46
3.92 4.59 5.16 2.95 4.01 3.28 26.12 23.49 24.72 25.69 26.43 27.49	Min. Elevation	23.61	20.99	21.84	23.35	23.89	25.09	25.51
26.12 23.49 24.72 25.69 26.43 27.49	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	6-MM	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
=	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	32	5	2000
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.

Groundwater Investigation Former Gulfport Fertilizer Site Gulfport, MS

0.054 0.0 0.095 0.095 0.0 0.052 0.0 0.031 0.0 0.061 0.0	0.010 0.010 0.010 0.010 0.010 0.010 0.010 0.010 0.010 0.010	0.036 0.010 0.039 0.050 0.016 0.050 0.050 0.065	6.010 6.010 6.010 6.010 6.010 6.010 6.010	0.016 0.061 0.030 0.034 <0.010 <0.010 0.032 0.032	 <0.010 <0.010 <0.010 <0.014 <0.011 <0.010 <0.010 <0.012
		0.010 0.010 0.039 0.048 0.050 0.019 0.060 0.060	6.010 6.010 6.010 6.010 6.010 6.010 6.010 6.010	0.061 0.034 0.034 0.032 0.032 0.031	 60.010 60.010 60.011 60.010 60.010
		0.010 0.039 0.048 0.016 0.050 0.050 0.050	6.010 6.010 6.010 6.010 6.010 6.010 6.010	0.061 0.034 0.034 0.032 0.032 0.033	60.010 60.010 60.014 60.010 60.010
		.039 .060 .016 .016 .060 .060	6.010 6.010 6.010 6.010 6.010 6.010	0.041 0.030 0.034 0.032 0.032 0.033	0.017 0.014 0.014 0.011 0.010 0.010
		.048 .019 .016 .050 .063	6.010 6.010 6.010 6.010 6.010 6.010	0.030 0.034 <0.010 <0.010 0.032 0.032	60.010 60.014 60.011 60.011
		.050 .019 .050 .050 .053	6.010 6.010 6.010 6.010 6.010	0.034 <0.010 <0.010 0.032 0.038	0.010 0.014 0.011 0.011 0.010
B. Tay		.019 .057 .050 .053 .053	6.010 6.010 6.010 6.010 6.010	 <0.010 <0.032 <0.031 <0.032 	0.010 0.014 0.011 0.010
		016 057 053 053 053	6.010 6.010 6.010 6.010	<0.010 0.032 0.031 0.028 0.032	0.010 0.010 0.010
		.057 .050 .055 .053	6.010 0.010 0.010 0.010	0.032 0.031 0.028	0.011 0.010 0.012
		.050 .053 .053	<0.010 <0.010 <0.010	0.031	0.011 <0.010
		.055 .053	<0.010	0.028	<0.010
		063	<0.010	0.032	0.012
		.050			
			<0.010	0.028	0.014
		.047	<0.010	0.024	0.012
		.053	<0.010	0.025	<0.010
		.042	<0.010	0.018	<0.010
	0.012 0	.049	<0.010	0.028	0.010
				0.027	
	0.015 0	0.035	0.011	0.024	0.018
0.063					0.019
	0.022 0	0.012	<0.010	0.024	0.017
					0.017
	0.014 0	0.013	<0.0010	0.026	0.013
0.025					
0.060	0.014 0	0.042	0.011	0.030	0.014

Sampling	MW-8	WW-8	MW-10	MW-1-	MW-12	MW-13	MW-14
10		<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
10-Duplicate	<0.010					<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.

Ta Ta

Groundwater Investigation Former Gulfport Fertilizer Site Gulfport, MS

0.016		The state of the s	THE REAL PROPERTY AND PERSONS ASSESSED.	White Street or other Designation of the last of the l	
0.020 0.0074 0.0087 0.015 0.015 0.015 0.014 0.011 0.011 0.023 0.0095 0.0050 0.027 0.0050 0.0050 0.028 0.0094 0.011 0.029 0.013 0.013 0.007 0.0050 0.0050 0.007 0.0050 0.0050 0.042 0.0050 0.0050 0.042 0.0050 0.0050 0.042 0.0050 0.0050 0.042 0.0050 0.0050 0.042 0.0050 0.0050 0.066 0.0050 0.0050 0.0067 0.0050 0.0050 0.0067 0.0050 0.0050 0.0050 0.0050 0.0050	, = 0 0				The state of the s
0.016	0.0074	0.016	<0.0050	<0.0050	<0.0050
0.014 <0.0050 <0.0050 0.023	.015	0.014	<0.0050		
0.023 0.0095 0.0076 0.023 0.0095 0.0050 0.022 <0.0050 <0.0050 0.027 0.0094 0.011 0.028 0.013 0.0092 0.0072 <0.0013 0.0092 0.0072 <0.0050 <0.0050 0.0083 <0.0050 <0.0050 0.0068 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.009 <0.0050 <0.0050 0.006 <0.0050 <0.0050 0.0071 <0.0050 <0.0050 0.0071 <0.0050 <0.0050 0.0071 <0.0050 <0.0050 0.0071 <0.0050 <0.0050	<0.0050		0.012	0.017	0.0062
0.023 0.0095 0.0076 0.023 <0.0050 <0.0050 0.022 <0.0050 <0.0050 0.027 0.0094 0.011 0.028 0.013 0.0092 0.0072 <0.0050 <0.0050 0.0083 <0.0050 <0.0050 0.0072 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.009 <0.0050 <0.0050 0.006 <0.0050 <0.0050 0.006 <0.0050 <0.0050 0.0071 <0.0050 <0.0050 0.0071 <0.0050 <0.0050			0.011	0.014	
0.023 <0.0050 <0.0050 0.022 <0.0050 <0.0050 0.027 0.0094 0.011 0.029 0.013 0.010 0.028 0.013 0.0092 0.0072 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.009 <0.0050 <0.0050 0.009 <0.0050 <0.0050 0.006 <0.0050 <0.0050 0.006 <0.0050 <0.0050 0.0071 <0.0050 <0.0050 0.0071 <0.0050 <0.0050 0.0071 <0.0050 <0.0050	0.0095		<0.0050	<0.0050	<0.0050
0.023 <0.0050 0.022 <0.0050 0.027 0.0094 0.019 0.0083 0.028 0.011 0.028 0.013 0.0072 <0.0050 0.0042 <0.0050 0.0050 <0.0050 0.006 <0.0050 0.006 <0.0050 0.006 <0.0050 0.006 <0.0050 0.006 <0.0050 0.006 <0.0050 0.0071 <0.0050 0.0071 <0.0050 0.0071 <0.0050 0.0072 <0.0050 0.0073 <0.0050 0.0074 <0.0050				<0.0050	
0.022 <0.0050 <0.0050 0.027 0.0094 0.011 0.019 0.0083 NS 0.029 0.011 0.010 0.028 0.013 0.0092 0.0072 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.009 0.0057 <0.0050 0.0067 br>0.0067 <0.0050 0.0067	<0.0050		<0.0050	<0.0050	<0.0050
0.027 0.0094 0.011 0.019 0.0083 NS 0.029 0.011 0.010 0.028 0.013 0.0092 0.0072 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.009 0.0067 <0.0050 0.0060 <0.0050 0.0061 <0.0050	<0.0050		<0.0050	<0.0050	<0.0050
0.019 0.0083 NS 0.029 0.011 0.010 0.028 0.013 0.0092 0.0072 <0.0050	0.0094		0.0063	0.0071	<0.0050
0.029 0.011 0.010 0.028 0.013 0.0092 0.0072 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.009 <0.0050 <0.0050 0.066 <0.0050 <0.0050 0.071 <0.0050 <0.0050 0.048 <0.0040 <0.0050	0.0083		0.0069	0.0074	0.0051
0.028 0.013 0.0092 0.0072 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.009 0.0067 <0.0050 0.066 <0.0050 <0.0050 0.071 <0.0050 <0.0050 0.048 0.0040 <0.0050	0.011	0.014	<0.0050	0.0087	0.0068
0.0072 <0.0050 0.0068 <0.0050 0.042 <0.0050 0.042 <0.0050 0.042 <0.0050 0.009 0.0067 0.066 <0.0050 0.071 <0.0050 0.048 0.0040	0.013		0.0086	0.0098	0.0062
0.0068 <0.0050 0.042 <0.0050 0.042 <0.0050 0.042 <0.0050 0.009 0.0067 0.066 <0.0050 0.071 <0.0050 0.048 0.0040	<0.0050		<0.0050	<0.0050	<0.0050
0.042 <0.0050 <0.0050 0.042 <0.0050 <0.0050 0.009 0.0067 <0.0050 0.0066 <0.0050 <0.0050 0.0061 <0.0050 0.0061 <0.0050 0.0061 <0.0050	<0.0050		0.0058	<0.0050	<0.0050
0.009	<0.0050		<0.0050	<0.0050	<0.0050
0.009 0.0057 <0.0050 0.006 <0.0050 <0.0050 0.0071 <0.0050 <0.0050	<0.0050	_	<0.0050	<0.0050	<0.0050
0.066 <0.0050 <0.0050 0.0061 <0.0050 <0.0050 0.071 <0.0050 <0.0050	0.0057		<0.0050	<0.0050	<0.0050
0.066 <0.0050 <0.0050 0.0051 <0.0050 <0.0050 0.048 0.0040 0.0012				<0.0050	
0.071 <0.0050 <0.0050 0.048 0.0040 0.0012	<0.0050	0.014	<0.0050	<0.0050	<0.0050
0.071 <0.0050 <0.0050	0.0051				<0.0050
0.048	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
0.048 0.0040 0.0042					<0.0050
71000	0.048 0.0040 0.0012	0.0028	0.0017	0.0055	<0.0010
12-Duplicate 0.0039	0.0039				
Average 0.025 0.009 0.010	00.00	0.012	0.008	0.011	0.006

Sampling Round	8-AM	WW-9	01-WW	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	
7	<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

								_					-
NRW-7	6.23	6.33	6.40	6.39	6.09	6.24	6.47	6.35	6.20	6.23	6.21	5.75	6.24
MW-6	5.41	5.86	5.70	5.88	5.90	5.83	5.62	5.90	6.21	5.84	5.76	5.61	5.79
NW-5	5.06	4.93	5.06	4.98	4.70	4.45	4.77	4.46	4.63	4.77	4.95	4.86	4.80
MW-4	4.41	4.46	4.43	4.32	4.08	4.18	4.45	4.27	4.74	4.35	4.44	4.08	4.35
MW-3	3.96	4.04	3.98	4.02	3.83	3.88	4.08	3.92	3.75	3.6	3.71	3.16	3.83
MW-2	3.95	3.94	3.91	4.15	3.75	3.99	3.96	3.85	3.86	3.64	3.56	3.06	3.80
MW-1	3.22	3.24	3.26	3.25	3.10	3.16	3.34	3.24	3.27	3.23	3.20	2.96	3.21
Sampling Round	1	7	ო	4	Ŋ	ဖ		œ	თ	9	7	12	pH Average

Sampling Round	WW-8	6-MW	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
7	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

<u>Notes:</u>
1. All pH readings are expressed in standard units.

LIST OF FIGURES

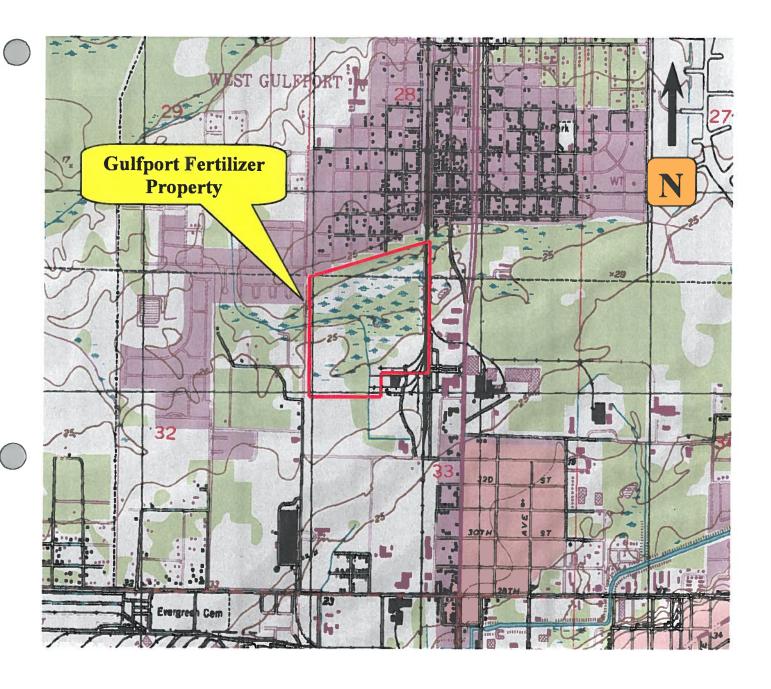
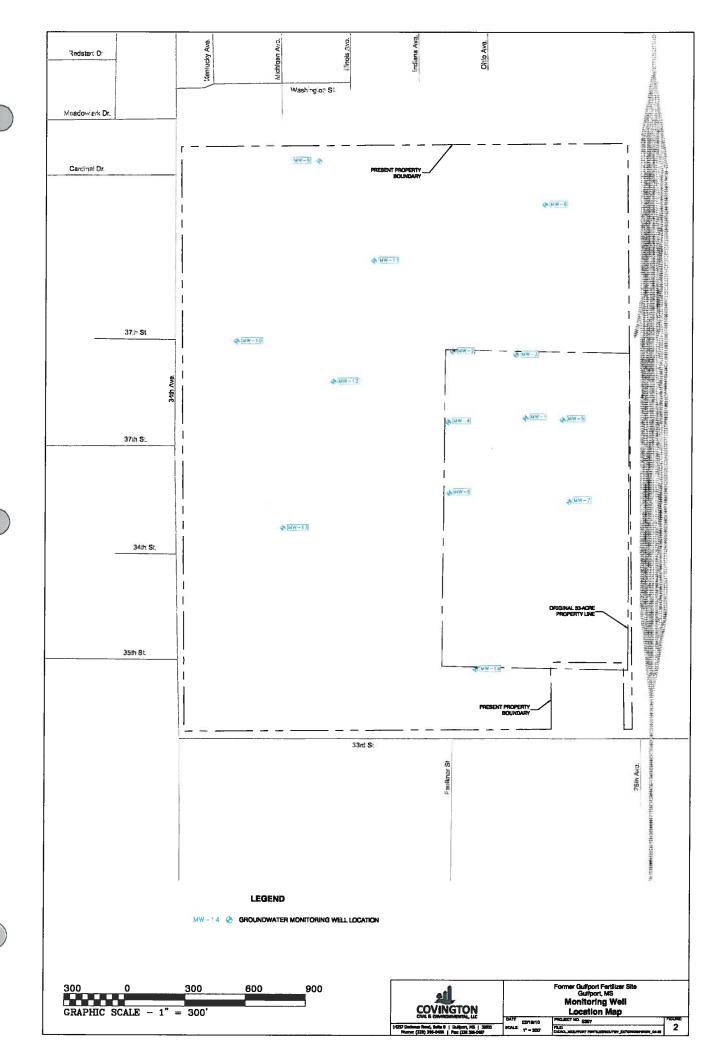
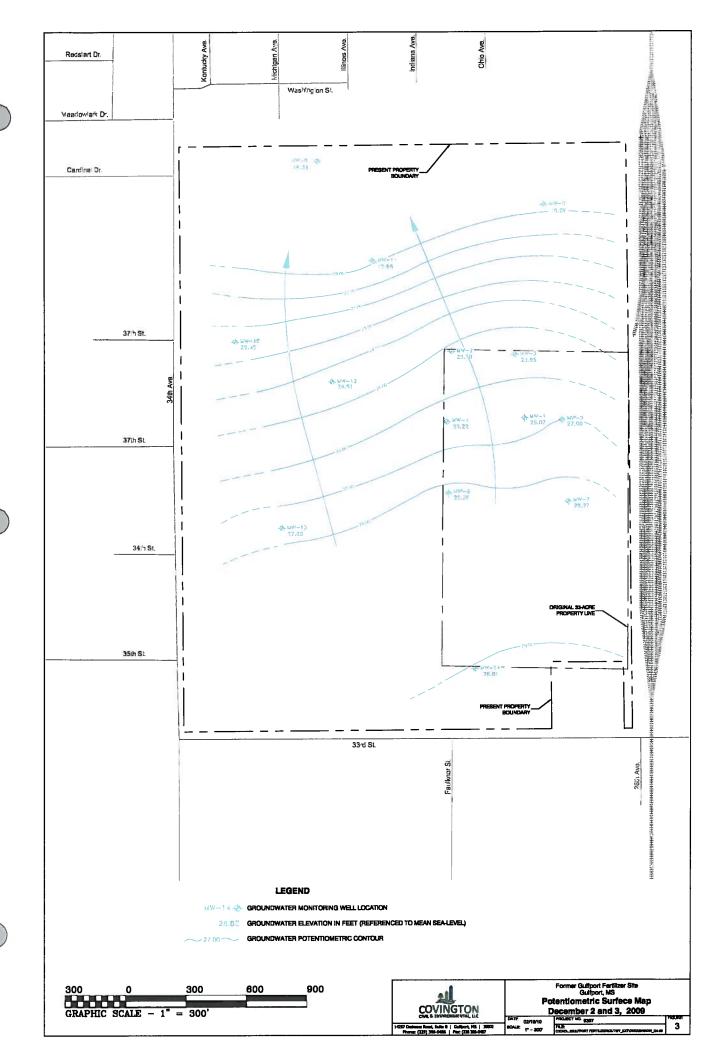
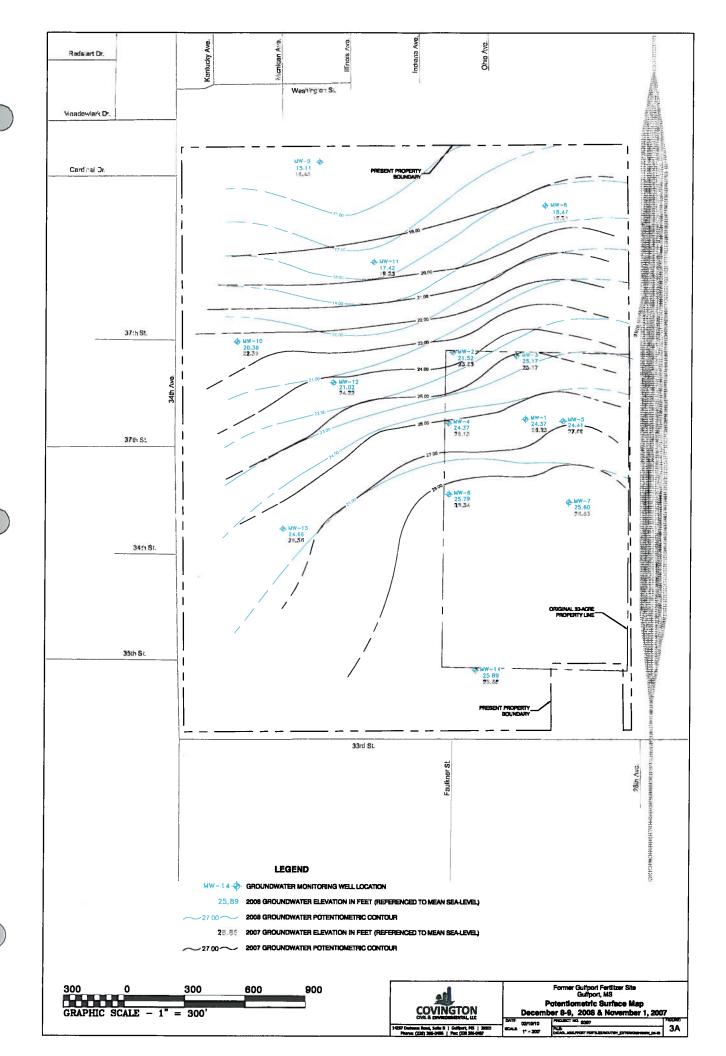
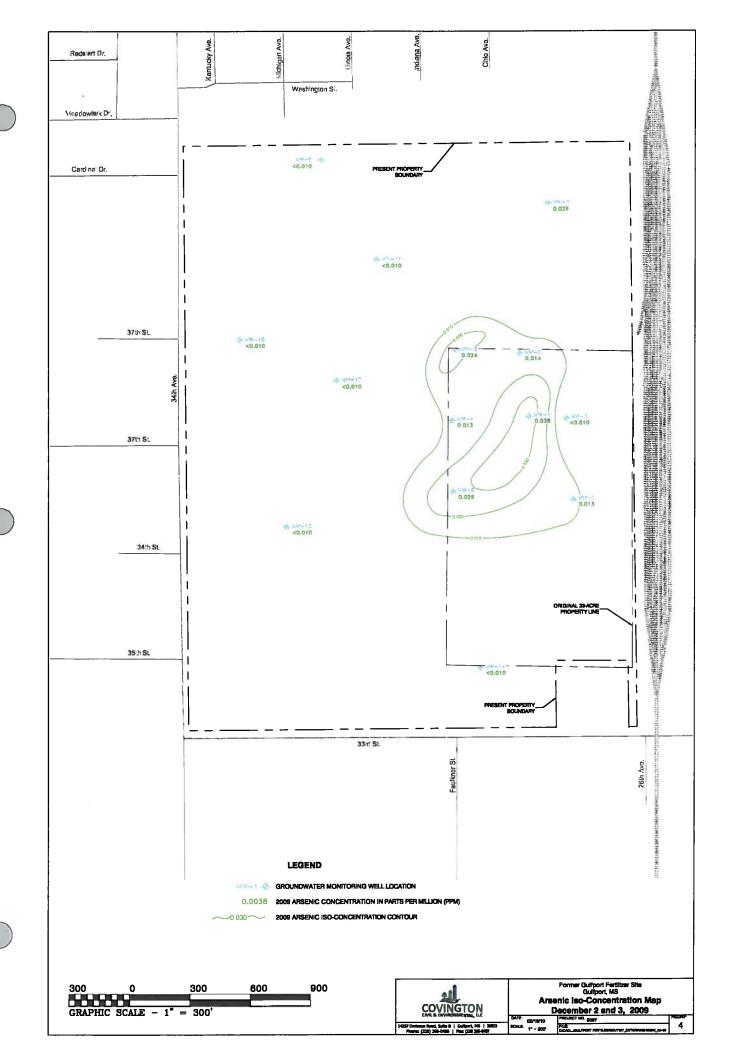


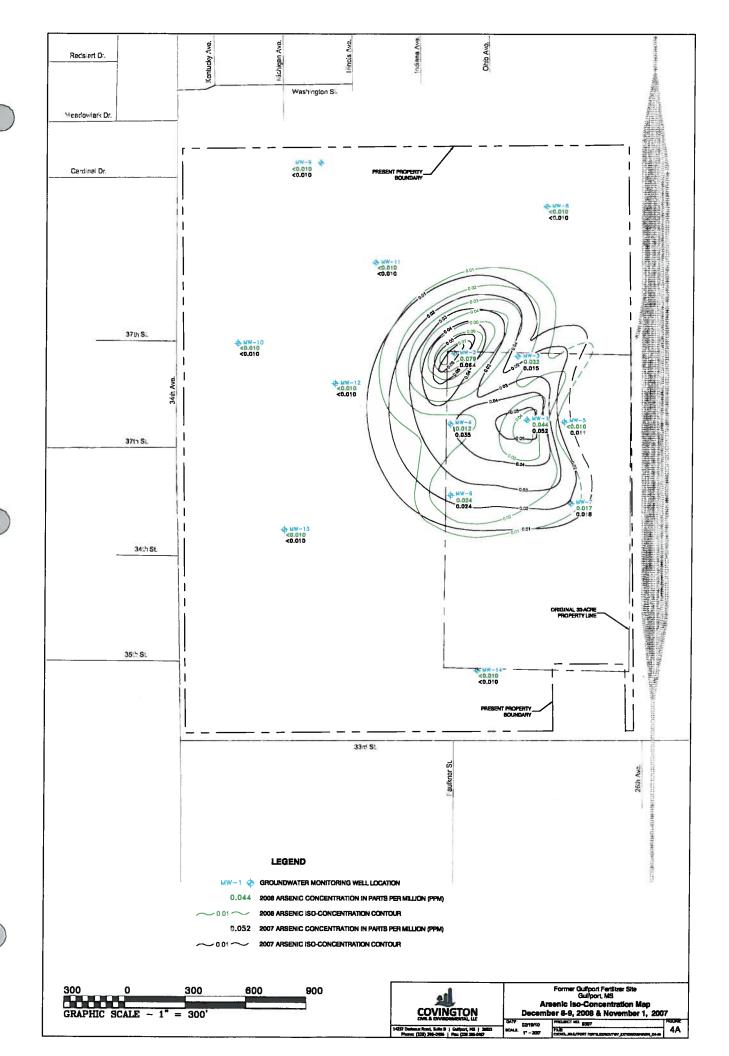
Figure 1 - Site Location Map Gulfport Fertilizer Site U.S.G.S. 7.5-Minute Quadrangle Map Gulfport North, Mississippi 1994 CAC Project # 9397

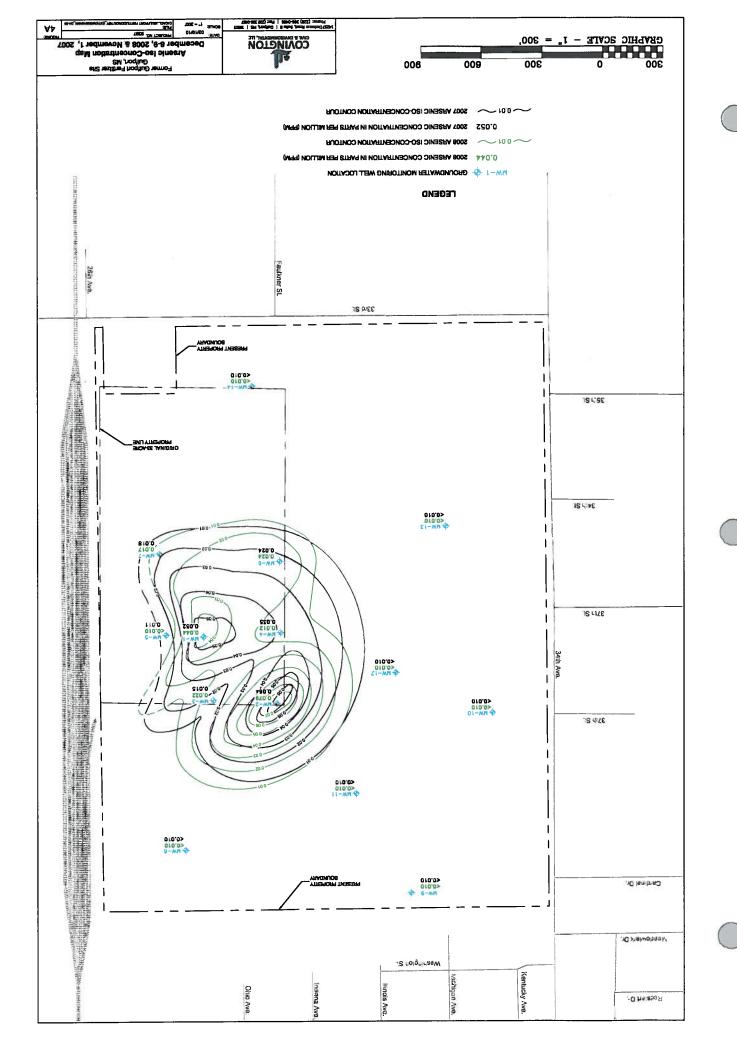


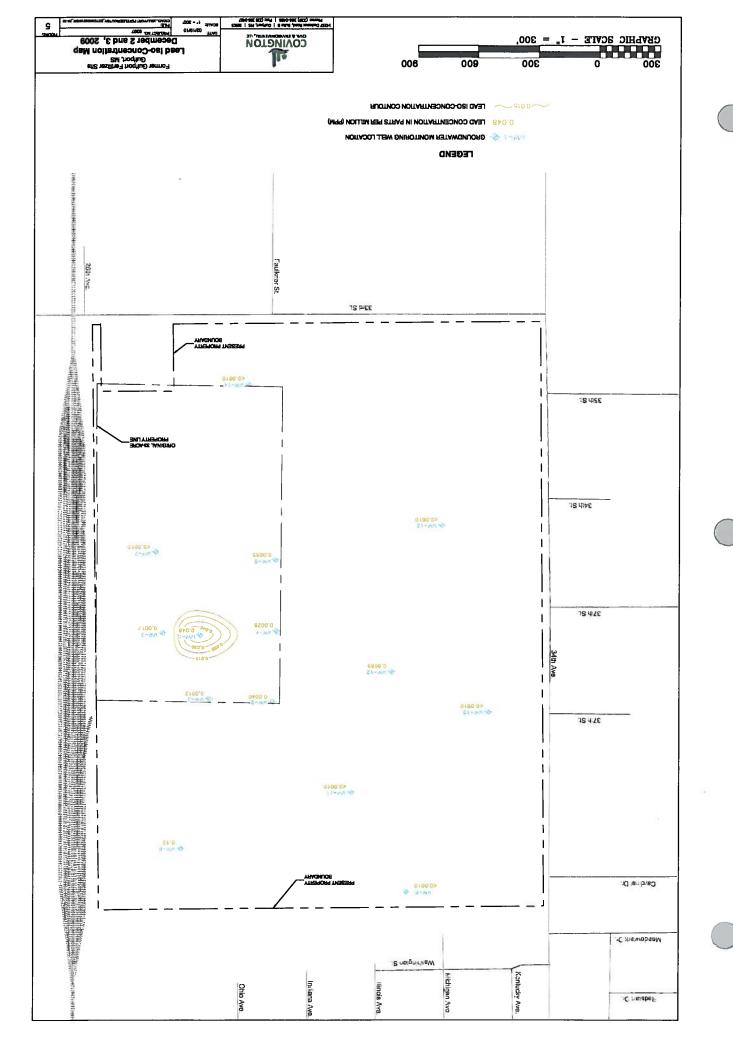


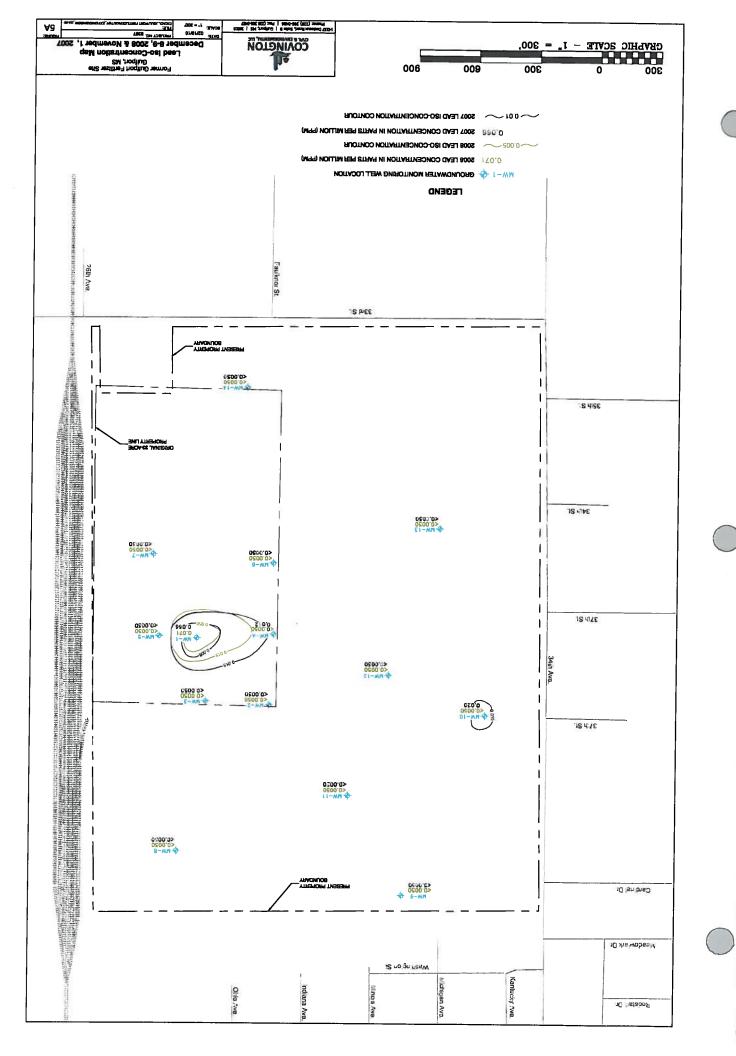


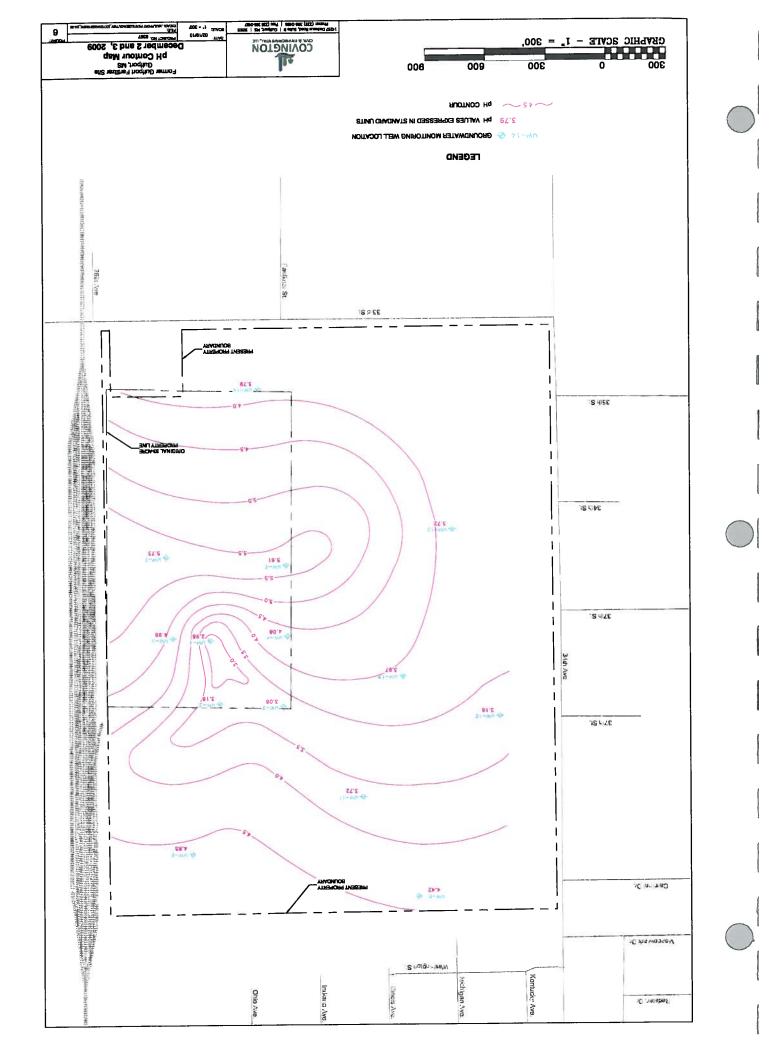


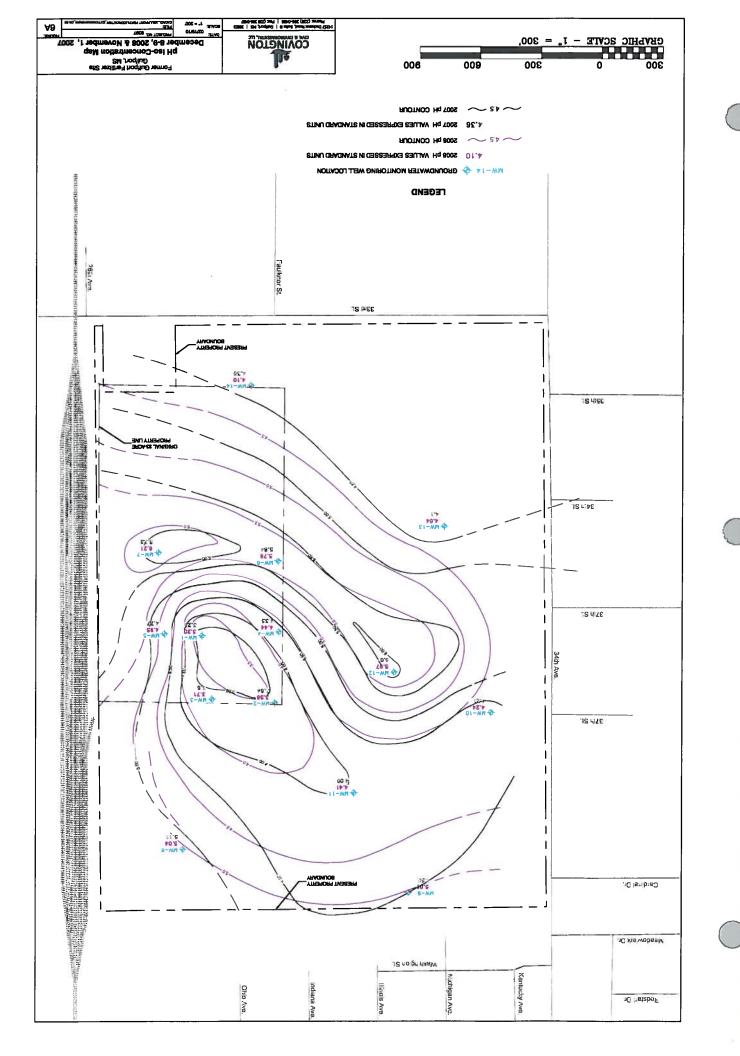












APPENDIX A

Well Sampling Field Data Sheets

					and		echnician:	Signature of Field Technician:
		1000 A						
		12:01			200	Jan 20	- colle	12:85
)				-	+		
19:12	365	2.86	ian	5.49	4.5	6.01	42	12:04
412	363	7.9%	144	63.7	7.2	2,2	40	24.42
0.12	366	2.86	ž	2.23	21.2	0.	20	2.40
0.17	38	2.05	72.	64.2	21.1	ri Pi	36	12.38
7	774	2.85	,53	64.6	20.9	83	32	12:36
2.5	777	2.02	.57	64.9	20.7	7	28	12:32
8.0	2000	2-03	65.	65.2	10.7	6	24	17:28
5.	355	7.02	.62	65.6	70. B	Ŋ	2.0	12:24
œ. Y	407	2.8	1E.	8:59	20.8	4	9.1	12:20
						0	0	12:04
(NTU)	Potential (mV)	Ţ	(ppm)	(mS/cm)	(°C)	(Gallors)	(Min.)	(Hr:Min)
Field	Oxygen	Field	Dissolved	Conductivity	Field	Purged Volume	Time	Time
			nation	Sampling Information				Purging Methodology:
	urged (Gallons):	Min. Volume to be Purged (Gallons):		urged (Gallons):	Min. Volume to be Purged (Gallons):		ırged (Gallons):	Min. Volume to be Purged (Gallons):
,	allons):	Well-Volumes X 3 (Gallons):	\	allons):	Well Volumes X 3 (Gallons):		allons):	Well Volumes X 3 (Gallons)
74.2	me = Water Column X Well Multiplier (Gallons):	Well Volume = Wate		r Column X er (Gallons):	Well Volume = Water Column X Well Multiplier (Gallons):		r Column X ar (Gallons):	Well Volume = Water Column X Well Multiplier (Gallons):
0.653		Well Multiplier:	0.041		Well Multiplier:	0.023		Well Multiplier:
	4" Well			1" Well			3/4" Well	
7	*77		Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Multiplier)	Calibration for Well Volume umn, in Feet X 7.481 X Well	(Water Col			
	76.07						uction:	Well Casing Construction:
5.73	24.09	6,36	17.26	27,26	29.35	32.43	4.	MW-1
(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Inches)	
Water	Water Level	Water	Bottom of Screen	Top of Screen	Ground	Top of Casing	Well	Well No.
		W	ion	Well information				
		•	Serial No.					Turbidity Meter No.
			Serial No.				No.	Conductivity Meter No.
			Serial No.					pH Meter No.
			ent	Fleid Equipment			100000	
	MS		Site	Gulfport Fertilizer Site	iption:	CAC Project Description:	1 P. IT	Sampler: LV
	Gulfport	City:		9397		CAC Project No.	60/2/12	Sampling Date:
					1000			

NOTE - MW-1 Casing modified (extend up) in Oct 2007 TOC elevation noted on this data sheet reflects "newly" surveyed modification.

11:38 17 11:38 SAMPL	SAM	SAM	SAM	SAM		ا ا					الم الم	アンススー	(Hr:Min) (Min.)	Purged	Purging Methodology:	Min. Volume to be Purged (Gallons):	vveil volumes X 3 (Gallons):	Well Multiplier (Gallons):	Well Volume = Water Column X	Well Multiplier:	3/A" Woll		Well Casing Construction:	MW-3 2"	(Inches)	_		Turbidity Meter No.	Conductivity Meter No.	pH Meter No.	o Mary 1996	N S	Sampling Date: (4.3.09 CAC	
ES T	S S	ES T	LS T	153 17	155	7		2	7.0	300	1	102		(Galions)	and Volume	Mir	We			0 023				30.26	Elevation (Feet)	Top of Casing					1	CAC Project Description:	CAC Project No.	
					775	A COLO	200	30.4	00,0	+ 0.5	80.00	95	(°C)	Temperature		Min. Volume to be Purged (Gallons):	Well Volumes X 3 (Gallons):	Well Multiplier (Gallons):	Well Volume = Water Column Y	VII Advibilian	(Water Cet			27 AG	Elevation (Feet)	Ground								
						0.0	200	77.1	2.F.C	27.4	27.5		(ms/cm)	Conductivity	Samping morning	rged (Gallons):	allons):	r (Gallons):	Column	Z. Meli	Water Ceiums, in Fest X 7.481 X Well Multiplier	Coltration to Mail Value	20.02	34 33	Elevation (Feet)	Top of Screen	Wed Informati				Florid Equipment	Gulfnort Eartill-ar 6	9397	Page Christian
						12	1.0	20,	81.18	1.30	1.79		(ppm)	Dissolved Oxygen	ED TOTAL	56.5		1.93	0.163	***	1 X Well Multiplier)	No.	11.32		Elevation (Feet)	Bottom of Screen	Serial NO.	Serial No.	Serial No.	Social No.	one one	245	, mo	allo Sa corporation
						कारद	3,16	3,15	3,13	\$,12	3.1		P" (Field		Min. Volume to be Purged (Gallons):	Well Volumes X 3 (Gallons):	Well Volume = Water Column X Well Multiplier (Gallons)	Well Multiplier:				400	3	Level	Water					State:	CITY		
						242	262	296	sol	305	OIS		Potential (mV)	Oxygen		urged (Gallons):	Sallons):	<pre>rme = Water Column X Well Multiplier (Gallons):</pre>		6" Well	K	25.95	45.12	(Feet)	Elevation	Water Level					MS	Gulfport		
						4.5	8.3	15.0	0.21	30.0	O 75		(NTU)	Field					1.469		ľ	0	11.85	(Feet)	Column	Water							M = 0.	

2550m

Well Sampling Field Data Sheet
Covington and Associates Corporation
Pass Christian, MS

7

				Pass Christian, MS	MS			
Sampling Date: 12.6	20.	CAC Project No.		9397		City:	Gulfport	
Sampler: LL 72	7	CAC Project Description:	ption:	Gulfport Fertilizer Site		State:	MS	
				Flekt Equipme	ent	Control Control Manager		
pH Meter No.					Serial No.			
Conductivity Meter No.					Serial No.			
Turbidity Meter No.					Serial No.			
				Well informati	OM			
Well No.	Well Diameter	Top of Casing Elevation	Ground Elevation	Top of Screen Elevation	Bottom of Screen Elevation	Water Level	Water Level Elevation	Water Column
A.M.A.	ခ ှ	28.28	2F 93	20.40	10.40	3	77.33	500
Wall Casing Construction		10.10		20.70	10.770	2.0	20, 78	6 7. 0
well casing construction:				Calibration for Well Volume	Volume			
			(Water Col	Water Column, in Feet X 7.481 X Well	1 X Well Multiplier)			
	3/4" Well			2" Well			6" Well	
Well Multiplier:	*	0.023	Well Multiplier:	Column			China	1.469
Well Multiplier (Gallons):	lons):		Well Multiplier (Gallons):	er (Gallons):	15.62	Well Multiplier (Gallons	Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons)). 		Well Volumes X 3 (Gallons):	allons):	2.5	Well Volumes X 3 (Gallons):	allons):	
Min. Volume to be Purged (Gallons):	(Gallons):		Min. Volume to be Purged (Gallons):	⊔rged (Gallons):	7.7		olume to be Purged (Gallons):	
Purping Methodology:				Sampling information	ation			
-	Time	Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
(Hr:Min)	(Min.)		(°C)	(mS/cm)	(ppm)	***	Potential (mV)	(UTV)
5 487:01	147	T PUR	S E					
20:01	6	3.5	20.4	626	119	4.00	154	3.1
10:26	9	4.9	205	63.5	2	203	146	0
10:05	22	4.5	20,3	104.2	٥	4.05	144	-
10.52	26	5.0	20.6	4.59	41	405	141	w
10.55	29	2.2	20.4	65.6	. 18	8.06	6	1.2
10:55	33	6.0	20.0	65.9	4	4.08	136	(,
	•			,	•			
11:00	-		1	-				
2000	\$	- me lose	787	127	7500			
			,					
Signature of Field Technician;	cian:	1						
		'						

					\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	lan	echnician:	Signature of Field Technician:
					1			
)			
						1000	O A 10	7
					> 1	0 10 0	- 1	76
۲, ۱ ,	124	98,H	ע	P.05	נייוט	ハク	رد ک	
519	153	1.83 H. 93	رو	31.4	ري. نام.	(3, 25	Ŕ	&C):)
7.4	155	487	י עני	8,05	11C	4.8	(G	1:06
1 00	28	F. 8. 7.	الا	30,1	22.51	4,0	14	1004
	133	68,7	20	30.0	21.5	3.51	6)	ر ده:
9,8	156	88.11	124	98.6	27:15	נת	0)	00:1
1.85	129	189	88	28.6	21.5	3,5	ol c	12155
1				(START	Dume	(2) (S)
(UTV)	Potential (mV)	7	(ppm)	(m3(cm) 4	(°C) <		(Min.)	(Hr:Min)
Turbidity	Reduction	pH q	Dissolved Oxygen	Conductivity	Field Temperature	Purged Volume (Gallons)	Time	Time
			1000				9	Purging Methodolog
				Sampling Information	1000000000000000000000000000000000000		"Bea (Callotto).	Will. Volume to be a right (Camons).
	rged (Gallons):	Min. Volume to be Purged (Gallons):	6.3	rged (Gallons):	Min. Volume to be Purged (Gallons):		med (Gallons):	Min Volume to be D
	llons):	Well Volumes X 3 (Gallons):	2.6	allons):	Well Volumes X 3 (Gallons):		allons):	Well Volumes X 3 (Gallons):
	er (Gallons):	Well Multiplier (Gallons):	13.81	r (Gallons):	Well Multiplier (Gallons):		r (Gallons):	Well Volume = water Column A Well Multiplier (Gallons):
	Column X	Well Volume = Water Column X	0.163	Column X	Well Multiplier:	0.023		Well Multiplier:
1 460	O ARBII			2" Well			3/4" Well	
	Cm W/Cil		X Well Multiplier)	Water Column, in Feet X 7.481 X Well Multiplier	(Winter Coll			
			Columns	Calibration for Well Volum			uction:	Well Casing Construction:
13.81	67.00	5.10	13.19	23.19	29.25	32.10	2"	MW-5
		(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(inches)	
Column	Elevation	Level	Elevation	Elevation	Elevation	Elevation	Diameter	Well No.
Water	Water Level	Water	Bottom of Screen	West information				
			Serial No.	L				Turbidity Meter No.
			Serial No.	S			Vo.	Conductivity Meter No.
			Serial No.	Ş				pH Meter No.
		The state of the s		Flotd Equipment		は国際機関の関係の対		2000 Management (1000)
	MS	State: M	ดั	Gulfport Fertilizer Site		CAC Project Description:	N I	Sampler: (1
	Gulfport	City: G		9397	(A)	CAC Project No.	3.09	Sampling Date: 13

Sampling Date: (13/64	CAC Project No.		9397		Clty:	Gulfport	•
Sampler: LL/	24	CAC Project Description:	:ription:	Gulfport Fertilizer Site	ite	State:	SW	
四十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二				Field Equipment	THE REAL PROPERTY AND ADDRESS OF THE PARTY O			
pH Meter No.					Serial No.			
Conductivity Meter No	Vo.				Serial No.			
Turbidity Meter No.					Serial No.			
		PARTY SERVICES SERVICES		Well informati	90			THE PERSON NAMED IN
Well No.	Well	lop of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water
	(inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
9-WW	2"	34.29	31.23	25.34	15.34	5.40	18.32	1305
Well Casing Construction:	ction:					,		
			(Whiter Co	Calibration for Well Volume Weter Column, in Fast X 7.481 X Well	Well Volume			
	3/4" Well			2" Well			6" Well	
Well Multiplier:		0.023	Well Multiplier:		0.163	Well Multiplier:		1.469
Well Wultiplier (Gallons):	Column X r (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons)	Well Multiplier (Gallons):	13.05	Well Volume = Water Column X Well Multiplier (Gallons	me = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):	illons):		Well Volumes X 3 (Gallons):	Sallons):	21	Well Volumes X 3 (Gallons):	Sallons):	
Min. Volume to be Purged (Gallons):	rged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	6.3		Volume to be Purged (Gallons):	
Pwging Methodolog				Sempling information				
Time	Time	Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
(Hr:Min)	(Min.)	()	(°C)	(mS/cm)	(ppm)	7	Potential (mV)	(NTU)
がった	1	1						
15:31	C	2,0	19.9	2,44	1.35	5,49	109	りたり
13:35	б	2.0	ر. د.	22.5	1.16	5.54	47	S4.0
13:58	5	3.5	20.2	32 <u>.</u> 0	1.09	Sisse	هه	54.0
04:51	15	4.0	20,3	8.16	00.1	5.58	88	44.1
द्वादा	T,	25	20,3	8.16	.00	5.59	58	してわ
13:45	30	5.0	20,1	221	8	8.59	82	0.38
9h:21	ָּט	7.7	4,06	-74	. વૃદ્ધ	5,6	79	72,0
th: 51	SAV	PLES	TAKE	2				
	,							
	N	7						
Signature of Field Technician	chnician	Jan						

			Pass Christian, MS	NS.			
Sampling Date:	CAC Project No.		9397		City:	Gulfport	
Sampler:	CAC Project Description:		Gulfport Fertilizer Site	ite	State:	MS	
	The second second second		Field Equipment				
pH Meter No.			10	Serial No.			
Conductivity Meter No.			(4)	Serial No.			
Turbidity Meter No.	:			Serial No.			
			Well informatio				A CONTRACTOR OF THE PROPERTY OF
Well No. Well	Top of Casing	Ground Elevation	Top of Screen	Bottom of Screen Elevation	Water Level	Water Level Elevation	Water
(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
MW-7 2"	33.48	30.75	24.54	14.54	16.3	78,82	13.75
Well Casing Construction:							
		(Water Col	Calibration for Weil Volume Wester Column, in Feat X 7.451 X Well	x well Multiplier)			
3/4" Well			2" Well			6" Well	
Well Multiplier:	0.023	Well Multiplier:		0.163	Well Multiplier:	Chart	1.469
Well Volume = Water Column X Well Multiplier (Gallons):		weil volume = water Column X Well Multiplier (Gallons):	er (Gallons):	13.73	Well Wultiplier (Gallons	Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	allons):	ال الو الو	Well Volumes X 3 (Gallons):	allons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	6,69	Min. Volume to be P	lume to be Purged (Gallons):	
Andreas and the second			Sampling Informs				
Time Time	Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved Oxygen	Field	Oxygen Reduction	Field Turbidity
(Hr:Min) (Min.)		(°C)	(mS/cm)	(ppm)		Potential (mV)	(UTU)
OE:E	\						
2:58	W	4.12	9:94	J.	5.67	14	7.95
1) 12:41	3,5	21.8	46.6	44-	5,70	14	34.0
भा भारत	4.0	ગ્રા. જ	4.6	الف	5,72	- 7	25.7
٥	4.5	8.16	とうち	06,	5,73	- 0	19.6
3118 18	5.0	4.16	46.9	06.	27.5	- 0	3.4
18 18:C	8,5	4.15	0.17	,19	24.5	9) -	2.4
8	6.0	4.18	9.54	119	54.5	- 1 9	V. 12
\$.	MPLES TA	入りと					
	1						
10		"					
Signature of Field Techniciany	7						

				Pass Christian, MS	AS.			
Sampling Date:	2.09	CAC Project No.		9397		Clty:	Gulfport	
Sampler: LL/	P44	CAC Project Description:		iā.	Te .	State:	MS	
				Field Equipment	William Company		PROPERTY OF SECTION	CONTROL OF THE PARTY OF THE PAR
pH Meter No.					Serial No.			
Conductivity Meter No.					Serial No.			
Turbidity Meter No.					Serial No.			
		是一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个		West information			THE REAL PROPERTY AND ADDRESS OF	
Well No.	Well Diameter	Top of Casing Elevation	Ground Elevation	Top of Screen Elevation	Bottom of Screen Elevation	Level (Feet)	Water Level Elevation	Water Column (Feet)
9-1468	2"	22.54		15.20	5.20	2.65	19. 39	14.69
Well Casing Construction:								
			(Winter Con	Celibration for Well Volume Wester Column, in Fest X 7,481 X Well	Yolune X Well Multiplier)			
	3/4" Well			2" Well			6" Well	
Well Multiplier:		0.023	Well Multiplier:		0.163	Well Multiplier:	China	1.469
Well Volume = Water Column X Well Multiplier (Gallons):	olumn X Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	r (Gallons):	14.69	well volume = water Countil A Well Multiplier (Gallons	Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):	ons):		Well Volumes X 3 (Gallons):	allons):	がた	Well Volumes X 3 (Gallons):	allons):	
Min. Volume to be Purged (Gallons):	ed (Gallons):		Min. Volume to be Purged (Gallons):	rged (Gallons):	81.5	Min. Volume to be Purged (Gallons):	rged (Gallons):	
				Sampling Inform	ndon			
Time	Time	Purged Volume	Field	Conductivity	Dissolved Oxygen	Field	Oxygen Reduction	Field Turbidity
(Hr:Min)	(Min.)		(°C)	(mSJpm)	(ppm)		Potential (mV)	(UTU)
1:58	9	Q					•	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
2:07	9	ر در	1.0E	4.31	81.	6.7	-62	- Y
2:10	مو	35	9.00	16:1	17	4.83	-63	
2:13	15	O.H	20,3	(6.2	21.0	4.85	-69	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
21:15	7	5.0	25.5	16.4	14	7.86	£ + 3	4
नाद	وا	5.5	7.06	9.9	Ę	7. 7.	34-	77,000
51.4	٩	6.0	20.5	6.3	Î	28.7	\$ t-	\\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\
7::2	22	6.0	30.Y	16.8	-	4.83	76-	
۲, ۲, ۲, ۲, ۲, ۲, ۲, ۲, ۲, ۲, ۲, ۲, ۲, ۲	z	0,1	20,4	6.8		4.85	-80	7
という。	SAMO	LES T	AKEZ					#
		1						
Simple of Field Too	halalan:							
Signature of Field Technician:	:hnician:	Chr.	7					

			Pass Christian, MS	N.S.			
Sampling Date: (1) - 2 - CC	CAC Project No.		9397		City:	Gulfport	
Sampler: LL/24	CAC Project Description:	iption:	Gulfport Fertilizer Site	Site	State:	MS	
			Field Equipme	OHT.			
pH Meter No.				Serial No.			
Conductivity Meter No.				Serial No.			
Turbidity Meter No.			L	Serial No.			
			themedal light				
Well No. Well Diameter	Top of Casing Elevation	Ground Elevation	Top of Screen Elevation	Bottom of Screen Elevation	Water Level	Water Level Elevation	Water Column
2"	22.64		16.13	6.13	1.22	19.31	(5.19
Well Casing Construction:	•						ľ
		Celib (Water Column)	Calibration for Well Volume uran, in Feat X 7.481 X Well	Volume Y X Well Mustation			
3/4" Well			2" Well			6" Well	
Well Multiplier:	0.023	Well Multiplier:		0.163			1.469
Well Multiplier (Gallons):		vveii voiume = vvater Column X Well Multiplier (Gallons):	r Column X er (Gallons):	•	Well Volume = Water Column X Well Multiplier (Gallons	me = Water Column X Well Muttiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	allons):	2.14	Well Volumes X 3 (Gallons):	iallons):	
Min. Volume to be Purged (Gallons):):	Min. Volume to be Purged (Gallons):	urged (Gallons):	6.45	_	/olume to be Purged (Gallons):	
Punjinj Nethodology:			Sampling Inform	ation			
Time Time	Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved Oxygen	Field	Oxygen Reduction	Field
		(°C)	(mS/cm)	(ppm)		Potential (mV)	(UTU)
	,6						
1:15	13.0	20.3	.134	,51	3.21	303	トトた
	ري اي	20, 7	.134	.53	5.25	282	677
1:21	4.0	20.9	184	44	3.31	259	684
1 : 24 व	4.5	ع. ال <i>د</i>	133	,36	3,52	226	684
1: 27	5.0	١.١٤	- 131	جر.	3,70	189	6.21
45.1	5,5	21.5	130	ا ا	3,95	161	2034
12.24	6.0	21.4	151	2 2	4.18	123	1072
hs ±5:1	6.5	ر الح	132	5.94	プル・カ	9/	
1:58			•		•		
7							
		\	-				
Signature of Field Technician:	12 / a	ann					
Cignature of the comments	/	1					

0.	1000 10000 100				(=:2:		
#	CAC Project Descri		Gulfport Fertilizer	Site	••	MS	
			Flord Equipm			Strong Technology	
				Serial No.			
				Serial No.			
				Serial No.			
			Well Informat	ion .			
Well Diameter	Top of Casing Elevation	Ground Elevation	Top of Screen Elevation	Bottom of Screen Elevation	Water Level	Water Level Elevation	Water Column
(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
2"	27.69		19.73	9.73	5,20	22.49	14.76
tion:							
		(Water Co	Calibration for We lumn, in Pest X 7.4				
3/4" Well			2" Well			6" Well	
	0.023	Well Multiplier:		0.163	Well Multiplier:		1.469
Well Volume = Water Column X Well Multiplier (Gallons):		Well Volume = Wate Well Multipli	er (Gallons):	12.76	Well Volume = Wate	er Column X lier (Gallons):	
ons):		Well Volumes X 3 (0	Sallons):	26.24)	Well Volumes X 3 (0	Sallons):	
jed (Gallons):		Min. Volume to be F	urged (Gallons):	(2.08 W	Min. Volume to be P	urged (Gallons):	
			Sampling infor	lion)			
- 1	Purged Volume (Gallons)	Field	Conductivity	Dissolved Oxygen	Field	Oxygen Reduction	Field Turbidity
(Min.)	,	(°C)	(ms)cm)	(ppm)		Potential (mV)	(UTN)
0	0						
10	3.5	£.61	ن. ن	1,08	3,19	326	679
15	4	19.8	84	0,1	3,18	383	736
15	4,5	E.191	8.5	194	3.18	334	78.L
၀	σ	8.61	٩,4	36.	3.16	328	75
גע	8,8	اجاحا	8.4	8£'	816	\$58	6
25.	2	19.9	8.4	84.	EIR	340	6
30	6.5	19.8	7.8	24,	3.18	240	696
;							
	DH Meter No. Conductivity Meter No. Turbidity Meter No. Turbidity Meter No. Well No. Well No. Well Casing Construction: Well Wultiplier: Well Volume = Water Column X Well Multiplier (Gallons): Well Volumes X 3 (Gallons): Well Volume to be Purged (Gallons): Well Volume Time Purged (Hr:Min) 11:10 0 11:35 15 11:35 35 35 35 35 35 36 36 36 36 36 36 36 36 36 36 37 37 38 38 38 38 38 38 38 38 38 38 38 38 38		Vell CAC Project Description: Top of Casing Elevation (Feet) (Feet) (Feet) (Feet) (Fill Column (Fill Column)) Per Purged Volume (Fill Column) Ground (Fill Column) Ground (Fill Column) Well Volumn (Fill Column) Ground (Fill Column) Grou	CAC Project Description: IT Top of Casing Elevation Elevation (Feet) 27.69 27.69 27.69 Well Multiplier: Well Volume = Water (Well Volume = Water (Well Volume S X 3 (C) Min. Volume to be P Gallons) Gallons Gallo	CAG Project Description: Guifport Fertilizer Site	CAC Project Description: Guipport Fertilizer Site	CAC Project Description: Guilfport Fertilizer Site State: MS

			and the same of th	Pass Christian, MS	MS			
Sampling Date: 12.	2.09	CAC Project No.		9397		City:	Gulfport	
Sampler: LL		CAC Project Description:		Gulfport Fertilizer Site	ite	••	MS	
	AND SECTIONS	Assessment and Assessment	A SEPTIMENT OF THE	Fletd Equipment				
pH Meter No.					Serial No.			
Conductivity Meter No.	ō.				Serial No.			
Turbidity Meter No.					Serial No.			
					0.00			の語を記している。
Well No.	Well	Top of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water
	(inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
11-000	2"	22.85		15.05	5.05	2,89	305	14.95
Well Casing Construction:	ction:						19.96	
			Gillator Col	Calibration for Weil Younne Calibration for Weil Younne	Yotuno Y Wed Mutholleri		M	
	3/4" Well			2" Well			6" Well∕	
Well Multiplier:		0.023	Well Multiplier:		0.163	Well Multiplier:	S-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	1.469
weil volume ≈ vvaler Column ∧ Well Multiplier (Gallons):	(Gallons):		Well Multiplier (Gallons):	er (Gallons):		Well Multiplier (Gallons	Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):	illons):		Well Volumes X 3 (Gallons):	allons):	2,43	Well Volumes X 3 (Gallons):	allons):	
Min. Volume to be Purged (Gallons):	rged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	7.31	Min. Volume to be Pu	lume to be Purged (Gallons):	
Pureing Methodolog				Sampling inform				
Time	Time	Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
(Hr:Min)	(Min.)	(omions)	(°C) 1	(mscm)	(ppm)	7.	Potential (mV)	(NTU)
3:48	ø	8.		(
18 S. E.	3 12	2,5	19.8	114	6,27	2,33	25	8.4
HO:2	14	٠ ن ا	19,0	1113	08.6	44.2	0 8	.0
£0:8	4	R.S	19.9	٠ ټ	hx.1	3,52	88	0.0
2:10	بر 0	5.0	30.0	10	4.63	3.56	رود	ō
31.14	h ¢	SS	90.0 9.06	110	5.71	3,69	149	Ó
2117	27	6.0	0.06	10	5,83	5,72	281	ė
米3:18	SAME	LESTA	スロン					
Signature of Field Technician:	echnician:		7					
Cignosci C Ci i cia								

					Pass Christian, MS	#S			
	Sampling Date: 12	P0.6.	CAC Project No.		9397		City:	Gulfport	
		7	CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	SW	
	DL Motor No				a.s.	Serial No			
	Conductivity Meter No.	ָּהָּ ו				Serial No.			
	Turbidity Meter No.				1 I	Serial No.			
					12	00	A STATE OF		
	Well No.	Well	Top of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level Elevation	Water
		(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
	MW-12	2"	28.92		20.95	10.95	4.31	24.61	13.66
	Well Casing Construction:	ction:							
					Calibration for Well Volume Officiar Column, in Feet X 7.451 X Well Institution)	Yolune X Weil Multiplier)			
		3/4" Well			2" Well			6" Weil	
	Well Multiplier:		0.023	Well Multiplier:		0.163	Well Multiplier:		1.469
	Well Volume = Water Column X Well Multiplier (Gallons):	Column X (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons)	lume = Water Column X Well Multiplier (Gallons):	13.6	veit volume = vvai Weil Multi	Well Multiplier (Gallons):	
	Well Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons):	Gallons):	2,23	Well Volumes X 3 (Gallons):	Gallons):	
	Min. Volume to be Purged (Gallons):	rged (Gallons):		Min. Volume to be Purged (Gallons):	ourged (Gallons):	6.6	Min. Volume to be Purged (Gallons):	Purged (Gallons):	
	Puruha Mathodoloo	1			Sampling Information				
		Time	Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved Oxygen	Field	Oxygen Reduction	Field
	(Hr:Min)	(Min.)		(°C)	(ms/cm)	(ppm)		Potential (mV)	(NTU)
	12:.08	Ø	0						
•	12:20	17	*	20,0	12.3	60.	4.15	1	200
έχ	7	7	3.5	20.1	122	2.83	4.05	88	an an
The state of the s	12:26	80	4.0	20.2	12.1	0.71	4,00	181	538
15	12:	2.0	A·S	20.3	0.53/10	0.4	3.99	25	200
3	12: 32	24	0.5	20.0	0.71530	0.	3.94	92	34)
66	12:35	44	2.2	20.1	0.050 V	0.59	3.96	42	
S. S.	17:32	90	6.0	200	OPO.	.57	20.00	9 0	
2.50	14:2:11	25	pi X	20.3	.090	. 49	46.5	1 86	
¥8	X								
\				3					
. `	Signature of Field Technician:	achnician:			\				
Cando		9							Page 1 of 2
36									

				Pass Christian, MS	MS		_	
Sampling Date: 17	7/09	CAC Project No.		9397		City:	Gulfport	
Sampler: R/+/	ŗ	CAC Project Description:	iption:	Gulfport Fertilizer Site		State:	MS /	
/		3. 作品的是《ACED		Field Equipme	建筑和高速等等等等等。			
pH Meter No.					Serial No.			
Conductivity Meter No.					Serial No.			
Turbidity Meter No.					Serial No.			
				Well Informati	98			
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)
1894-13	2"	32.36		24.30	14.30	2.5	7.7.85	13.55
Well Casing Construction:	ion:							
			(Vilator Co	Calibration for Well Volume (Water Column, in Feet X 7.481 X Wall Middlpflar)	Yolune * X Wall Mulliplier)			
	3/4" Well			2" Well			6" Well	
Well Multiplier:		0.023	Well Multiplier:		0.163	Well Multiplier:		1.469
Well Multiplier (Gallons):	Sallons):		vveir volume = vvater Column X Well Multiplier (Gallons):	er (Gallons):	13.55	vveii volume = vvater Column X Vveii Multiplier (Gallons	Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):	ns):		Well Volumes X 3 (Gallons):	allons):	2,2	Well Volumes X 3 (Gallons):	allons):	
Min. Volume to be Purged (Gallons):	d (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	6.6	Min. Volume to be P	olume to be Purged (Gallons):	
Purging Methodology:				Sampling Information	STEET,			
Time	Time Purged	Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved Oxygen	Field pH	Oxygen Reduction	Field Turbidity
15:42	0	4						
15:55	7	3.0	21.3	P.F	۲۲،	₹.₽	787	1.1
15:59	6	28	21.2	7,8	. 34	3.35	243	2,8
6 03	20	4.0	21.0	8.0	38.	3.76	225	2.0
40:9	25	4.5	21.	3,0	10,	14.8	200	1.3
16	2.0	0.3	واد	لبر 00 م	200	かた。	105	, w
2		2	21.7	מל.	7	ر د د د	100) C
- (42×19×	7	6 Olad					4	
Signature of Field Technician:	ınician:		Min					

* L'allectes Deplicate suple (QX)

Page 1 of 2

				Pass Christian, MS	MS			_
Sampling Date: 17	60.5.61	CAC Project No.		9397		City:	Gulfport	1
Sampler: LL \	P H	CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	MS \	_
pH Meter No.				essionales ones	Serial No			
Conductivity Meter No.	No.				Serial No.			
Turbidity Meter No.					Serial No.			1
			STATE OF THE PARTY	Well informati	3			
Well No.	Well	Top of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water
	(Inches)	(Feet)	(Feet)	(Feet)	Elevation (Feet)	(Feet)	Elevation (Feet)	Column
11年第	2"	34.08		25.83	15.83	10.5	2000	20 2
Well Casing Construction:	uction:					,	7981	
			(Matter Co	Calibration for Wed Volume			4	1
	3/4" Well			2" Weil		THE RESIDENCE OF STREET SALES	6" Well	
Well Volume - Water Column Y	Caluma	0.023	Well Multiplier:		0.163	Well Multiplier:		1.469
Well Multiplier (Gallons):	er (Gallons):		vveii voiume = Water Column X Well Multiplier (Gallons)	Well Multiplier (Gallons):	4,95	Well Volume = Water Column X Well Multiplier (Gallons	ume = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons):	Gallons):	80	Well Volumes X 3 (Gallons):	allons):	
Min. Volume to be Purged (Gallons):	rged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	م, د م	Min. Volume to be Purged (Gallons):	urged (Gallons):	
Purging Methodolog	1			Sampling information				
Time	Time	Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
(Hr:Min)	(Min.)	(SallOlls)	(°C)	(ms)	Oxygen (ppm)	PI	Reduction Potential (mV)	Turbidity /
2:02	\							, , ,
£0.5	q		20.8	= :	95.1	አ ዩኒክ	199	0.26
2109	4	1.5	30G	11.1	4,10	4.09	3)6	ฉี
7:1	2	3 .0	£.05	II. 1	3,99	3.95	PS &	17,2
تو: بو	Ó	2.25	207	0.0	3.90	3.92	746	10.0
21:18		2.50	20.5		5.38	1,85	225	ه.ه
7) (4	7	24.6	20.5	0.11	18.5	3,79	ગ્રહા	4.2
21:6	- W	6	20.5	0.0	3.75	95.5	ಸಿ	م
9:10	シネア	SALES	レススの					
Signature of Field Technician:	chnician:		7					
247.5	0							

APPENDIX B

Laboratory Analytical Report Sheets and

Chain-Of-Custody Forms



YOUR LAB OF CHOICE

Page 1 of 19 16 Samples Reported: 12/11/09 10:47 Printed: 12/11/09 10:47

Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304. This report may not be reproduced, except in full, without written approval from Environmental Science Corp.

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.

ASIA - 1461-01, AIHA - 100789, AL - 40660, CA - 1-2327, CT - PH-0197, WD - R-140 AZ - 0612, MM - 047-999-395, MY - 11742, WI - 2006, WA - 00109, WV - 233 AZ - 0612, MM - 047-999-395, MY - 11742, WI - 2006, WA - 00109, WV - 233 AZ - 0612, MY - 0612, MY - 2006, WY -

Laboratory Certification Numbers

Cratg Cothron, ESC Representative

Entire Report Reviewed By:

The analytical results in this report are based upon information supposed by you, the client, and are for your exclusive use. If you have appread questions regarding this data package, please do not hest ate call.

Entire Report Reviewed Ru.

Description: Gulfport Fertillzer

Client Project: 9397

Report Number: L435201

Samples Received: 12/04/09

Friday December 11, 2009

Report Summary

engtport, Ms 39503

Covington & Associates 14257-B Dedeaux Road Mr. Lars Larson

Eaf. 1970

982#180-S3 .G.I xET

Egx (615) 758-5859 6989-L9L-008-I Mt. Juliet, TN 37122 (615) 758-5858

12065 Lebanon Rd.

Mr. Lars Larson

YOUR LAB OF CHOICE

Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

Lead, Dissolved

Collected By : Collection Date :

Arsenic

Parameter

Sample ID

Describtion Date Received

Arsenic, Dissolved

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

This reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

1/6m 1/6m

T/bw

Units

6020

6020

6020

0209

мегрод

Project # :

Десешрек 11, 2009

Site ID :

0.0010 0.0010 0.0010

0.0010

Det. Limit

REPORT OF ANALYSIS

0.0022

BDL

2100.0

Result

IS\0S\09 II:40

Gulfport Fertillzer

MM-IO

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

Page 2 of 19

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12/09/09

12/10/09

12/10/09

L6E6

Est. 1970

Tax I.D. 62-0814289 Esx (615) 758-5859 Mt. Juliet, TW 37122 (615) 758-5858 1-800-767-5859 12065 Lebanon Rd.

ESC Sample # : L435201-01

Page 3 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Wote:

7/6w 7/6w 7/5w 0.0050 0.0010 0.0010 0.0069 DDL τ 12/09/09 0209 Lead, Dissolved 12/10/09 0209 Arsenic, Dissolved Lead ς 15/09/09 90209 BDL 0.0010 τ 15/10/09 6020 T/6w 9200.0 yrsenic Result DīJ. Date Wethod Units Det. Limit Parameter

> I2/02/09 12:42 Collection Date :

Collected By

MM-12 Sample ID

Description

December 04, 2009 Date Received

> I4257-B Dedeaux Road Gulfport, MS 39503 Covington & Associates

Mr. Lars Larson

REPORT OF ANALYSIS

Est. 1970

L6E6

ESC Sample # : L435201-02

Project # :

December 11, 2009

site ID :

Tax I.D. 62-0814289

E9x (615) 758-5859 12065 Lebanon Rd. Mt. Juliet, TW 37122 (615) 758-5859 1-800-767-008-1

Page 4 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Vote:

T/6w 0.0010 0.0010 0.0010 12/09/09 6020 0.000 Lead, Dissolved T/bw T/bw 12/10/09 6020 BDF Arsenic, Dissolved Lead 15/09/09 ς 6020 BDL T/6m 0.0010 12/10/09 6020 ₽T00°0 Arsenic Dil. Date метрод Stinu Det. Limit Result Parameter

> Collected By : Collection Date : I2/02/09 13:38

6-WW Sample ID

Describtion

December 04, 2009 Gulfport Fertillzer Date Received

> 14257-B Dedeaux Road Gulfport, MS 39503 Covington & Associates Mr. Lars Larson

> > YOUR LAB OF CHOICE

REPORT OF ANALYSIS

Est. 1970

L6E6

ESC Sample # : L435201-03

Project # :

December 11, 2009

Site ID :

482 I.D. 62-0814289

Fax (615) 758-5859 6585-L9L-008-T 12065 Lebanon Rd. Mt. Juliet, TW 37122 Mt. Juliet, TW 37122 (615) 758-5858

Page 5 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:

T/6W 12/09/09 0209 0.0050 BDL Lead, Dissolved T/6m T/6m T/6m 0.0050 12/10/09 6020 0.12 Arsenic, Dissolved Lead 15/09/09 ς 9020 BDL Т 12/10/09 0100.0 6020 620.0 Arsenic DīI. Date Метрод ցդրաը Det. Limit кезит Parameter

> L. Larson 12/02/09 14:25 Collection Date: Collected By

8-WM Sample ID

December 04, 2009 Gulfport Fertillzer Description

Date Received

14257-B Dedeaux Road Gulfport, MS 39503 Mr. Lars Larson Covington & Associates

REPORT OF ANALYSIS

December 11, 2009

ESC Sample # : L435201-04

Est. 1970

L6E6

Project # :

site ID :

48. I.D. 62-0814289

Eax (615) 758-5859 6989-L9L-008-I 12065 Lebanon Rd. Mt. Juliet, TW 37122 (615) 758-5858

Page 6 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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Note: BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL)

Arsenic Arsenic, Dissolved Lead Lead, Dissolved	0.00.0 DIA DIA SE00.0	0100°0 0500°0 0100°0	1/6m 1/6m 1/6m	0209 0209 0209	0/60/21 75/00/00 75/00/00 75/70/00	T T S T
191911919	Result	Det. Limit	Units	метрод	Date	DII.

I2/02/09 15:18 Collection Date :

Collected By

Sample ID

Description

December 04, 2009 Date Received

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

REPORT OF ANALYSIS

ресещрет 11, 2009

Est. 1970

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E2C 29mbJe # : F432501-02

Project # :

Site ID

482 I.D. 62-0814289

Fax (615) 758-5859 6989-L9L-008-T 12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858

Page 7 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL)

12/09/09 12/10/09 1/6m 1/6m 1/6m S 6020 6020 6020 0500.0 0.0010 0.0050 BDF Lead, Dissolved BDL Lead 12/09/09 Arsenic, Dissolved 0100.0 12/10/09 6020 T/bw BDL yrseurc Units Dil. Det. Limit мегрод Result Parameter

I2/02/09 16:18

Collected By : Collection Date :

Sample ID

Description

December 04, 2009 Date Received

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

REPORT OF ANALYSIS

December 11, 2009

ESC 29mbje # : F432501-00

Project # :

Sife ID :

Est. 1970

L6E6

Tax I.D. 62-0814289

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

12065 Lebanon Rd.

A.C.I.E.N.C.E.B

Page 8 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

note: This reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

Arsenic Arsenic, Dissolved Lead, Dissolved	BDL BDL 108 0.0024	0100.0 0200.0 0100.0	7/6ш 7/6ш 7/6ш	0709 0709 0050 0900	0/60/2T 15/06/06 15/06/06 15/10/06	T T S T
Parameter	Result	Det. Limit	Unita	Метрод	Date	Dil.

l. Larson 12/02/09 00:00

Collected By : Collection Date :

DOB-I Sample ID

December 04, 2009 Gulfport Fertillzer Description

Date Received

I4257-B Dedeaux Road Gulfport, MS 39503 Mr. Lars Larson Covington & Associates

REPORT OF ANALYSIS

0761 .3s3

4666

ESC Sample # : L435201-07

Project # :

December 11, 2009

Site ID :

Tax I.D. 62-0814289

Fax (615) 758-5859 6985-L9L-008-I 12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858

Page 9 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL)

Arsenic Arsenic, Dissolved Lead Lead, Dissolved	\$20.0 \$200.0 \$00.0 \$000.0	0100.0 0200.0 0100.0	1/pm 1/pm 1/pm	0709 0709 0709 0709	T5/00/00 T5/10/00 T5/00/00 T5/10/00	T S T
T22200779	ınsəx	חפבי דישוב	satun	меглод	Date	DTT.

I2/03/09 10:11 Collection Date:

Collected By

MM-2 Sample ID

Description

December 04, 2009 Gulfport Fertillzer Date Received

> Gulfport, MS 39503 14257-B Dedeaux Road Mr. Lars Larson Covington & Associates

REPORT OF ANALYSIS

Est. 1970

ESC 29mbje # : I432501-08

Project # : 9397

December 11, 2009

site ID :

Tax I.D. 62-0814289

Fax (615) 758-5859 6989-L9L-008-I Mt. Juliet, TW 37122 (615) 758-5858 12065 Lebanon Rd.

Page 10 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

REPORT OF ANALYSIS

December 11, 2009

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Tax I.D. 62-0814289

12/09/09

12/09/09

12/10/09

Date

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Esx (615) 758-5859 1-800-19L-2829 Mt. Juliet, TN 37122 (615) 758-5858 12065 Lebanon Rd.

L. Larson 12/03/09 11:00

December 04, 2009 Gulfport Fertillzer

b-MM

:

BDL 0.0028 0.0024 είο.0

Кези1с

0100.0 00100.0 00100.0

0100.0

Det. Limit

SJinU

mg/1 mg/1

T/bw

Project # :

Site ID :

0209

6020 6020

9020

мегрод

E2C 29mbje # : F432501-09

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

YOUR LAB OF CHOICE

Lead, Dissolved

Collected By : Collection Date :

Arsenic, Dissolved

read

Arsenic

Parameter

Sample ID

Describtion Date Received

Page 11 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

_	• • • • • •	חמרב	DOULTER	STIIO	3.TWTG *3.2G	TREST	722200778
	τ	TS/T0/06	0709	T/pmi	0.000	₽T0°0	Arsenic
	S	T5\09\09	9050	T/Em	0.0050	8700.0	Arsenic, Dissolved
	τ	15/10/06	9709	Ţ/₽m.	0.0010	2100.0	read
	S	15/09/09	6020	т/бш	0.0050	BDL	Lead, Dissolved

I2/03/09 II:38 Collected By : Collection Date :

Sample ID

E-WM

Describtion

December 04, 2009 Gulfport Fertillzer Date Received

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, Ms 39503

REPORT OF ANALYSIS

Est. 1970

ESC 29mbJe # : F432501-10

Project # : 9397

December 11, 2009

Site ID :

88SP180-SB .G.I x&T

Fax (615) 758-5859 Mt. Juliet, TW 37122 (615) 758-5858 1-800-767-5859

12065 Lebanon Rd.

Page 12 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL)

mg/1 mg/1 0500.0 0.0010 0.0050 220.0 840.0 840.0 ς 12/09/09 6020 Lead, Dissolved 12/09/09 6020 6020 τ S Arsenic, Dissolved 12/10/09 0209 T/bm 0100.0 850.0 Arsenic Date DīT. Units Method Det. Limit Result Ратаметег

> L. Larson 12/03/09 12:45 Collection Date : Collected By

Sample ID

December 04, 2009 Gulfport Fertillzer Describtion Date Received

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

REPORT OF ANALYSIS

Est. 1970

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ESC 29mbJe # : F432501-11

Project # :

December 11, 2009

site ID :

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Eax (615) 758-5859 6585-L9L-008-I 12065 Lebanon Rd. Mt. Juliet, TW 37122 (615) 758-5858

Page 13 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL)

BDF

BDL BDL 0.0017

Result

I2/03/09 13:12 Collected By : Collection Date :

Sample ID

Describtion

December 04, 2009 Gulfport Fertillzer Date Received

> I4257-B Dedeaux Road Gulfport, MS 39503 Mr. Lars Larson Covington & Associates

Lead, Dissolved

Arsenic, Dissolved

read

Yrsenic

Parameter

REPORT OF ANALYSIS

0.0050 0.0010 0.0010

0100.0

Det. Limit

December 11, 2009

1\pm 1\pm 1\pm 1\pm

Units

9050

9020

0209

6020

Method

Project # :

sife ID :

Est 1970

L6E6

E2C 29mbje # : r432501-15

Tax I.D. 62-0814289

12/09/09

12/10/09

15/09/09

12/10/09

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

Page 14 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit(PQL)
Note:

0.026 0.024 0.055 0.055

Result

7/6w 7/6w 7/6w

T/Em

Units

6020 6020 6020

9020

Метрод

Project # :

December 11, 2009

site ID :

0.0050 0.0010 0.0010

0100.0

Det. Limit

REPORT OF ANALYSIS

Tax I.D. 62-0814289

Est. 1970

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Dil.

12/09/09

12/10/09

15/09/09

12/10/09

Date

L6E6

E2C 29mbje # : F432501-13

Eax (615) 758-5859 6585-L9L-008-I 12065 Lebanon Rd. Mt. Juliet, TW 37122 (615) 758-5858

December 04, 2009 Gulfport Fertillzer

I2/03/09 13:47

9-MW

Mr. Lars Larson Covington & Associates I4257-B Dedeaux Road

Gulfport, MS 39503

read bissolved

Collection Date: Collected By

Arsenic

Parameter

Sample ID

Description Date Received

Arsenic, Dissolved

YOUR LAS OF CHOICE

2.C.I.E.N.C.E.2 B·V·7 Page 15 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Voce:

I I S I	T5\08\08 T5\08\08 T5\08\08 T5\08\08	0050 0050 0050 0050	7/6w 7/6w 7/6w 7/6w	0100.0 0200.0 0100.0	BDL BDL BDL 0.0015	Arsenic Arsenic, Dissolved Lead, Dissolved
DįĮ.	Date	Метрод	Units	Det. Limit	Result	Parameter

L. Larson 12/03/09 14:16

Collected By : Collection Date :

Sample ID MM-14

Description

December 04, 2009 Gulfport Fertillzer Date Received

Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

Mr. Lars Larson

YOUR LAB OF CHOICE

F-V-B R-C-I-E-M-C-E-8

REPORT OF ANALYSIS

December 11, 2009

0761 .3e3

Project # :

Site ID :

L686

ESC 29mbje # : F432501-14

Tax I.D. 62-0814289

E9x (615) 758-5859 12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5859 1-800-767-5859

T.V.B. S.C.I.E.N.C.E.S

YOUR LAB OF CHOICE

Page 16 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

Note:
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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL)

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Collection Date :

IS\03\09 I4:54 Collected By

> : Sample ID

L-WM

December 04, 2009 Gulfport Fertillzer Description

Date Received

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

REPORT OF ANALYSIS

December 11, 2009

Project # :

Sife ID :

0791 .38E

L6E6

ESC Sample # : L435201-15

48141. G2-0814289

Egx (615) 758-5859 6989-191-008-I 12065 Lebanon Rd. Mt. Juliet, TW 37122 Mt. Juliet, TW 37122 (615) 758-5858

Page 17 of 19

Reported: 12/11/09 10:47 Printed: 12/11/09 10:48

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BDL - Below Detection Limit (PQL) Det. Limit (PQL) Det. Limit - Practical Quantitation Limit (PQL)

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> IS/03/09 00:00 Collection Date:

Coffected By

Sample ID

DNB-S

Description

December 04, 2009 Gulfport Fertillzer Date Received

Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road Gulfport, MS 39503

REPORT OF ANALYSIS

December 11, 2009

Project # :

Sife ID :

Eaf 1970

L6E6

ESC Sample # : L435201-16

Tax I.D. 62-0814289

Egx (615) 758-5859 6989-L9L-008-T

12065 Lebanon Rd. Mt. Juliet, TW 37122 (615) 758-5858

A shakent A List of Analyters with QC Qualifiers

0	R1029208	esd, Dissolved	3 dwas	LLIBSBOM	
ŏ	R1029208	rsenic, Dissolved		MC424IJJ	T432501-16
ŏ	R1029208	rsenic, Dissolved	SAMP	MC424IJJ	F432501-12
ō	R1029208	rsenic, Dissolved	SAMP	MC424111	T432501-14
Ō	R1029208	rsenic, Dissolved	SAMP	MCTRTLL	F432501-15
Ō	R1029208	pead, Dissolved	SAMP	MC424ILL	F#32501-10
0	R1029208	rsenic, Dissolved	SAMP	LLIBSBOM	P432501-09
0	R1029208	rsenic, Dissolved	SAMP	LLIBSBOM	P432201-07
0	R1029208	bead, Dissolved	SAMP	MC424111	
0	R1029208	rsenic, Dissolved	SAMP	MC424111	P432501-06
0	R1029208	rsenic, Dissolved	SAMP	MC424111	F432201-02
0	81029208	bead, Dissolved	SAMP	MC424I11	
0	R1029208	rsenic, Dissolved	4MA2	MC424111	P432501-04
0	R1029208	rsenic, Dissolved	4MA2	MC424111	P432501-03
0	R1029208	rsenic, Dissolved	4MA2	MC424111	P432501-05
0	R1029208	rsenic, Dissolved	4MA2	MG424177	P432S01-01
		22/17/11	Type	eronb	7200004
19ilifuQ	Run ID	улајусе	Sample	Work	Sample Number

Attachment B Explanation of QC Qualifier Codes

Qualifier Meaning

(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.

0

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 established ranges. Results are evaluated and all reported data is valid and useable unless qualified as 'R' (Rejected).

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, such relevant to samples such as:

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.

- Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.

Page 19 of 19

Summary of Remarks For Samples Printed 12/11/09 at 10:48:18

TSR Signing Reports: 034 R5 - Desired TAT

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Page 1 of 2 I Samples Reported: I2/21/09 09:53 Printed: I2/21/09 09:53

in laboratory standard operating procedures: 060302, 060303, and 060304. Where applicable, sampling conducted by ESC is performed per guidance provided This report may not be reproduced, except in full, without written approval from Environmental Science Corp.

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.

AZLA - 1461-01, AIHA - 100789, AL - 40660, CA - 1-2327, CT - PH-0197, FL - E87487 MJ - TWOOZ, MJ WELAP - TWOOZ, SC - 84004, TW - 2006, WA - 00109, WV - 233 AZ - 0612, MW - 047-999-395, MY - 11742, WI - 998093910

Laboratory Certification Numbers

Craig Cothron, ESC Representative

Entire Report Reviewed By:

The analytical results in this report are based upon information suppred by you, the client, and are for your exclusive are. If you have appread questions regarding this data package, please do not heatale cail.

Description: Gulfport Fertillzer

Client Project: 9397

Samples Received: 12/04/09

Report Number: L436536

Monday December 21, 2009

Report Summary

Gulfport, MS 39503

Covington & Associates 14257-B Dedeaux Road Mr. Lars Larson

Eat. 1970

Tax I.D. 62-0814289

Eax (615) 758-5859 6989-191-008-T 12065 Lebanon Rd. Mt. Juliet, TN 37122 Mt. Juliet, TN 37122 (615) 758-5858



Page 2 of 2

Reported: 12/21/09 09:53 Printed: 12/21/09 09:53

This reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL)

12/18/09 E0109 լ/ճա 0200.0 0200.0 BDF 0 12 Lead, Dissolved τ 12/12/09 E010B T/bu Dil. метрод Units Det. Limit Result Parameter

I2/02/09 14:25

Collected By : Collection Date : Coffected By

8-WM

Sample ID

December 04, 2009 Gulfport Fertillzer Describtion

Date Received

Culfport, MS 39503 Mr. Lars Larson Covington & Associates 14257-B Dedeaux Road

REPORT OF ANALYSIS

Est: 1970

4686

ESC Sample # : L436536-01

Project # :

December 21, 2009

Site ID :

Tax I.D. 62-0814289

Eax (615) 758-5859 2015 Table Table 12001 M. Juliet, TW 37122 M. (613) 788-5859 1-800-62859 F. (213) Yes

3.C:1.E:N:C.E:2

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

TSR Signing Reports: 034 R5 - Desired TAT

Summary of Remarks For Samples Printed

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Jako nadi (M)			d &	1 2	10-76772A1			Sample # (lab only)				one: (615) 758-5858 Fax: (615) 758-5859 Fax: (615) 758-5859	Phone: (800) 767-5859	12065 Lebanon Road Mt. Juliet, TN 37122		•	Custody Page of Z

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Received by: (Signature) Received by: (Signature)	Water OT - Other				1	1	12/3/04	Depth Date	Email? FAX?	(Lab MUST Be Notified) Datc Rcs	P.O.#:	COVASSOC-GULFPORT	City/State Gulf POPT/ MS	Emait\&r\ qr\sovingtonassociate	Gulfport,MS 39503	Mr. Lars Larson 14257-B Dedeaux Road	Billing information:
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COVINGTON CIVIL & ENVIRONMENTAL, LLC

SSOO-A S5TH AVENUE PH

PHONE (228) 396-0486 FAX (228) 396-0487 E-MAIL LARSLARSONZ8@GMAIL.COM



FILE

ft02,ft tsuguA

Ms. Leighton Janes

Offlice 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 Cuslity (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 potentiometric fluctuations of all site monitoring wells. This report further documents the abandonment of MW-14 and the installation of the treplacement 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 Guadrangle Map illustrating the location of the former Gulfport Fertilizer site is included as Eigure 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 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

Comprehensive Groundwater Monitoring Report Former Gulfport Fertilizer Site 33rd Street, Gulfport, MS

August 11, 2011 Page 2

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.

on the referenced site maps. A monitoring well location map is included as Figure 2. on the corners. Since its installation, MW-14(A) has been surveyed, and its location designated completion with a 3' x 3' concrete well pad, locking well expansion cap, and steel bumper posts bentonite pellet seal on top of the filter pack. MW-14(A), like the other wells, is a stand up pack to two-feet above the screened interval, followed by the construction of a two-foot slotted screen. Well completion materials included the placement of a fine graded sand filter filter pack. The well itself was constructed of a two-inch diameter casing with 10-feet of 0.10" advance borings and allow sufficient annular space for the placement of a slightly larger sand to install most of the previous site wells including the use of 6.5-inch hollow-stem augers to seal it. The installation of the replacement well (MW-14A) employed the same techniques used over drilled, a neat bentonite/cement slurry was poured into the bore hole to properly close and of the site. Once all well materials had been removed from MW-14 and the borehole properly replacement well (MW-14A) was installed inside the existing main access gate on the south side 14A) location. MW-14 was abandoned using the over drill technique required by the MDEQ. A known to be un-impacted by historical activities was selected for the replacement well (MWan un-impacted area of the overall site, a location just inside the main entrance in another area with proposed site improvements. Since MW-14 was a background monitoring well located in Storage Facility at the subject site. MW-14 had to be relocated since its location will conflict location. The Mississippi State Port Authority is planning on constructing an Emergency With respect to MW-14, CCE oversaw the abandonment of this well location only because of its

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 and to determine the well volume. 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° 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.

Comprehensive Groundwater Monitoring Report Former Gulfport Fertilizer Site 33rd Street, Gulfport, MS

August 11, 2011 Page 3

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° 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, TM 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 of an own 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 attritude.

August 11, 2011 Page 4

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 or five data in Table 2 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 mg/L at MW-7. 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 tainly significant variations in arsenic concentrations being found at MW-2 and MW-3. Slight to tainly significant variations in arsenic concentrations being found at MW-2 and MW-3. Slight to tainly significant variations in arsenic the same primary "core zone" of arsenic concentrations that exceed the Tier 1 TRG standard temain 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 reported some minor detections, but all of these concentrations are significantly lower than the reported some minor detections, but all of these concentrations are significantly lower than the

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 of geochemical changes in the surficial 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

August 11, 2011 Page 5

within the area of the original fertilizer site; specifically in the area closest to MW-1. figure illustrates that elevated lead concentrations above the 0.015 mg/L Tier 1 TRG remain SIYL the lead iso-concentration lines in the groundwater for the June 2011 sampling event. colloidal transport of excessive suspended solids within the water column. Figure 5 illustrates evidence that the increase in the "total lead" concentration at this location is the result of Furthermore, the dissolved lead concentration of MW-12 reported at 0.0010 mg/L is additional appears to be more of an isolated anomaly rather than a result of an extended plume. significantly lower than the Tier 1 TRG, the recent spike in lead concentrations at MW-12 original site and the outer perimeter (interceptor) wells report total lead levels that are aftention will have to be paid during future sampling events. Since monitoring wells within the excessively high turbidities have also been observed at this monitoring well location, so close were exceedingly high (i.e. too high for instrumentation to accurately record). Past issues with mg/L, just below the TRG Level 0.015 mg/L. During well purging and sampling, turbidity levels abnormal lead concentration was reported at MW-12 with a total lead concentration of 0.014 total lead concentrations that were less than the Tier 1 TRG. The only anomaly or slightly concentration reported in December 2010 of 0.072 mg/L. All other monitoring wells reported reports a total lead concentration at MW-1 of 0.13 mg/L, a slight increase from the lead exceeds the Tier 1 TRG for lead is MW-1. The most recent sampling event of June 2011 the groundwater at this site. Table 3 confirms that the only monitoring well that consistently

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.

continue to take place over time. Nevertheless, what this information reveals more clearly (as small pH fluctuations have occurred in all of the monitoring wells at this site, and most likely will occurring pH already exists in peripheral areas of the overall site. As previously commented, from MW-14(A), and previously from MW-14, establish that slightly depressed naturally information is available from the very southeastern portion of the original 33-acre site. Data that MW-14 has been abandoned, and MW-14(A) installed, additional background water quality 33-acre portion of the former Gulfport Fertilizer site (i.e. around MW-1, MW-2 and MW-3). Now primary observation is that the core area of depressed pH remains generally within the original Standard Unit. In spite of these gradual upward increases in the overall groundwater pH, the small and appear to represent upward fluctuation of between one-quarter and one-half of a all of the monitoring wells. These pH increases, as reported in December 2011, were relatively reported during the June 2011 sampling event confirm another slight increase in pH levels, but in events been reported just below 4.0. As in the December 2011 sampling event, the pH levels reported at MW-11 and MW-13 ranged from 4.0 to 4.3, but have in past sampling Figure 6 illustrates, remains within the area defined by MW-1, MW-2 and MW-3. The pH levels As in all of the previous sampling events, the primary zone of depressed pH < 4.0), as

August 11, 2011 Page 6

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.

CONCTUSIONS

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 potentiometric 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 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 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) acuse 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.

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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

Mr. Delma Powell, Hancock Bank

LIST OF TABLES

Groundwater Elevations Table 1

Gulfport, MS Former Gulfport Fertilizer Site Historical Groundwater Sampling Events

23.85	07.7S	26.10	23.07	88.81	21.60	74.71	19.26	POT Average
	66.S	6.1	3.2	£8.1	D.S.	3.34	⊅ ₹.0	Head Fluctuation
	68.2S	24.66	Z0.1S	Sp.71	8E.0S	11.31	74.81	Min. Elevation
a benefit	88.82	99.92	24.22	19.25	22.39	18.45	19.21	Max. Elevation
23.85	benobriedA	22.16	27.81	12.1	60.81	12.05	15.23	6/27-29/2011
	14.02	25.36	08.1S	88.81	87.0S	67.31	Z9.61	12/1-2/2010
	28.33	90.9Z	23.69	88.81	71.94	69.71	1.91	6/14-15/2010
	10.62	28.7S	19 [.] 42	96.61	22.49	15.91	68.er	12/2/2009
	68.82	24.66	20.12	24.71	S0.39	15.11	74.81	12/9/2008
	88.82	95.55	24.22	19.25	22.39	24.81	19.21	11/1/2007
1111111111					1000 (An 100 N		(A)8-WM	etsQ .
(A) Pr-WIM	br-ww	E1-WM	MW-12	FF-WW	O1-AAM	6-WM	8 8-WM	Sampling
			0.107			F 01.107	71.07	I 08210114 1.0 1
	46.7S	64.7S	26.43	25.69	24.72	23.49	26.12	POT Average
	36.6	3.28	10.4	2.95	91.3	69.4	3.92	Head Fluctuation
	25.51	25.09	83.62	23.35	18.12	20.99	13.61	Min. Elevation
	29.46	75.82	6.7 <u>S</u>	26.3	72	85.52	£2.7S	Max. Elevation
	24.41	23.99	77.52	22.13	19.02	95.91	22.02	1102/62-72/9
	Z6.53	87.32	81.25	25.16	23.04	69.22	16.42	12/1-2/2010
	28.03	67.7 2	26.34	25.43	24.38	23.12	25.59	6/14-15/2010
	72.82	9£.8Z	00.7S	26.22	26.3S	1.32	70.82	12/2/2009
	9.52	67.2S	74.41	76.42	14.SS	21.52	76.42	12/9/2008
	28.83	28.34	00.7S	S1.3S	71.32	23.65	£S.23	700S/I/II
	61.7S	8S.7S	26.03	87.2S	89.4S	23.65	98.2S	2/17/2006
	94.62	7E.8S	6.7 <u>S</u>	26.3	Z0.9Z	24.23	£2.7S	3/4/2004
	87.3S	67.92	25.72	25.52	23.63	22.92	74.2S	12/2/2003
	28.82	71.8S	12.7S	26.20	25.26	£8.EZ	27.03	9/11/2003
	29.12	28.35	84.72	91.92	00.7S	83.2S	27.15	6/12/2003
	97.7S	27.45	26.20	87.32	24.64	23.39	26.95	4/2/2003
	28.26	TT.T S	86.58	90.92	28.42	23.55	76.32	12/5-9/2002
	27.65	25.72	92.92	99.62	24.14	11.62	10.82	12/12/2002
	25.51	60.2S	23.89	23.35	21.84	20.99	19.62	6/19/2002
	T-WM	9-AAW	9-MW	P-MW	E-WM	Z-WM	F-WW	Balliqme8 Date

MW-8(A) was installed in May 2010 (immediately adjacent to) and as a replacement of MW-8. Consequently, water level elevations Monitoring Wells 8 through 14 were installed in October 2007. Note: All groundwater elevations in feet, mean sea level (ft., msl).

MW-14, consequently, the groundwater data colleted from MW-14(A) will be unique to this new location. MM-14 (A) was installed in June 2011 as a replacement of MW-14 (abandoned in June 2011). This is a different location from from June 2010 and all subsequent dates are reflective of MW-8(A).

Arsenic Concentrations Table 2

Gulfport, MS Groundwater Investigation Former Gulfport Fertilizer Site

610.0	920.0	110.0	9£0.0	210.0	640.0	0.030	Average
	110.0	1. 1.2					15-Duplicate
110.0	010.0	2100.0	1800.0	610.0	0.020	0.010	1102/62-72/8
					610.0	1	14-Duplicate
9£00.0	210.0	0100.0>	8600.0	210.0	810.0	120.0	12/1-2/2010
						6.053	13-Duplicate
110.0	SZ0.0	010.0>	910.0	010.0>	410.0	650.0	0102/31-41/
					0.025		12-Duplicate
0.013	920.0	0100.0>	0.013	410.0	0.024	850.0	12/2/2009
710.0							11-Duplicate
710.0	0.024	010.0>	0.012	0.022	670.0	0.044	12/9/2008
610.0					690.0		10-Duplicate
810.0	0.024	110.0	0.035	0.015	190.0	0.052	11/1/2007
	720.0						9-Duplicate
0.010	820.0	010.0>	670'0	0.012	001.0	710.0	2/17/2006
010.0>	810.0	010.0>	0.042	010.0>	280.0	210.0	8-Duplicate
010.0>	0.025	010.0>	620.0	010.0>	001.0	010.0>	3/4/2004
210.0	0.024	010.0>	740.0	010.0>	680.0	SS0.0	N-Duplicate
\$10.0	820.0	010.0>	0.050	\$10.0	060.0	0.030	12/2/2003
0.012	0.032	010.0>	0.053	110.0	920.0	520.0	6-Duplicate
010.0>	820.0	010.0>	520.0	010.0>	620.0	210.0	9/11/2003
110.0	150.0	010.0>	0.050	SN	910.0	810.0	5-Duplicate
110.0	0.032	010.0>	720.0	010.0>	ero.o	120.0	6/12/2003
\$10.0	010.0>	010.0>	910.0	010.0>	120.0	010.0>	4-Duplicate
010.0>	010.0>	010.0>	ero.o	010.0>	150.0	010.0>	4/2/2003
	₽£0.0		0.050				3-Duplicate
710.0	0.030	010.0>	840.0	010.0>	220.0	810.0	12/5-9/2002
	140.0	010.0>	0.039	010.0>	360.0		S-Duplicate
010.0>	190.0	010.0>	010.0>	010.0>	£70.0	010.0>	12/12/2002
		010.0>	010.0>			810.0	1-Duplicate
010.0>	910.0	010.0>	0.035	110.0	1-20.0	010.0>	2002/61/9
Y-WW	9-WM	S-WM	P-MW	E-WM	Z-WM	I-WW	Sampling

010.0>	010.0>	010.0>	S200.0	9100.0	100.0	100.0	620.0	Average
0200.0	benobnedA	0100.0>	6,0043	7200.0	1100.0	0100.0> 7200.0 7200.0	\$200.0	14-Duplicate 6/27-29/2011 15-Duplicate
	0100.0>	010.0> 0100.0>	8100.0	£100.0	0100.0>	0100.0>	0100.0>	13-Duplicate
	010.0>	0100.0> 010.0>	010.0>	010.0>	010.0>	010.0>	010.0>	12-Duplicate 6/14-15/2010
	0100.0>	010.0> 0100.0>	9200.0	8100.0	0.0012	A100.0	0.029	11-Duplicate
	010.0>	010.0> 010.0>	010.0>	010.0>	010.0>	010.0>	010.0> 010.0>	10-Duplicate 12/9/2008
	010.0>	010.0>	010.0>	010.0>	010.0>	010.0>	010.0>	11/1/2007
(A) br-WM	PL-NAM	EF-WW	MW-12	FF-WW	OF-WM	6-WW	8 8-WM (A)8-WM	Sampling ets Date

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.

Lead Concentrations Table 3

Groundwater Investigation Former Gulfport Fertilizer Site Gulfport, MS

900.0	110.0	800.0	210.0	010.0	600.0	820.0	Average
	0100.0>						15-Duplicate
0100.0>	0100.0>	7100.0	1100.0	8£00.0	9 800.0	61.0	1102/62-72/9
		ŀ		Ī	9£00.0		14-Duplicate
0100.0>	0100.0>	0100.0>	0100.0>	S100.0	0.0034	ST0.0	12/1-2/2010
		ı			1	870.0	13-Duplicate
8100.0>	8100.0>	8100.0>	8100.0>	8100.0>	0.0042	080.0	6/14-15/2010
		l		l	6500.0	/	12-Duplicate
0100.0>	6.0055	T100.0	8200.0	S100.0	0,0040	840.0	12/2/2009
0900.0>				l			11-Duplicate
<0.0050	0900.0>	0900.0>	0900.0>	0900.0>	0900.0>	170.0	12/9/2008
0200.0>			1		1200.0		10-Duplicate
0200.0>	0900.0>	0900.0>	410.0	0900.0>	0500.0>	990.0	11/1/2007
	<0.0050		l				9-Duplicate
<0.0050	0200.0>	0900.0>	0500.0>	0900.0>	7800.0	600.0	2/17/2006
<0.0050	0500.0>	0500.0>	0900.0>	0900.0>	0900.0>	0.042	8-Duplicate
0900.0>	0900.0>	0900.0>	0900'0>	0200.0>	0900.0>	0.042	3/4/2004
0500.0>	<0.0050	8200.0	0900.0>	0900.0>	<0.0050	8900.0	■ etsoilquG-Y
0500.0>	<0.0050	0900.0>	0900'0>	0900.0>	<0.0050	2700.0	12/2/2003
2900.0	8600.0	9800.0	0.015	S600.0	610.0	820.0	6-Duplicate
8900.0	7800.0	0900.0>	410.0	010.0	110.0	0.029	9/11/2003
1200.0	₽ ₹00.0	6900.0	£10.0	SN	£800.0	610.0	5-Duplicate
0500.0>	1700.0	£800.0	410.0	110.0	7600.0	720.0	6/12/2003
<0.0050	<0.0050	0900.0>	0500.0>	0900.0>	0500.0>	S20.0	4-Duplicate
<0.0050	<0.0050	0900.0>	0900.0>	0900.0>	0200.0>	0.023	4/2/2003
	<0.0050		9900.0				3-Duplicate
0900.0>	0900.0>	0900'0>	9900.0	9 700.0	2600.0	0.023	12/5-9/2002
	≱10.0	110.0	910.0	110.0	110.0		S-Duplicate
S 900.0	710.0	210.0	£200.0	0500.0>	0900.0>	410.0	12/12/2002
		0900'0>	410.0			210.0	1-Duplicate
0900'0>	0900.0>	0900.0>	910.0	7800.0	₽200.0	0.020	2002/61/9
		A STATE OF THE STA			CARLES OF		Date
7-WM	8-WM	S-WW	1-WW	WAN-3	Z-WM	I-WM	Sampling

010.0>	010.0>	100.0	200.0	800.0	0.020	0.012	0.120	Average
						er00.0		15-Duplicate
P100.0	benobnedA	0.0025	\$10.0	SE00.0	7£00.0	8100.0	0.0024	1102/62-72/9
				l		0100.0>		14-Duplicate
	0100.0>	S100.0	6,00.0	0100.0>	0100.0>	0100.0>	0100.0>	12/1-2/2010
		8100.0>		l				13-Duplicate
	8100.0>	8100.0>	PP 00.0	1800.0	8100.0>	S10.0	8100.0>	6/14-15/2010
		0100.0>		ľ				12-Duplicate
	0100.0>	0100.0>	6900.0	0100.0>	0100.0>	0100.0>	0.12	12/2/2009
		0900.0>		1		l		11-Duplicate
	0500.0>	0900.0>	0500.0>	<0.0050	0200.0>	0500.0>	0900'0>	12/9/2008
		0900.0>		1		l	0900.0>	10-Duplicate
	0900.0>	0900.0>	0900.0>	0900.0>	20.0	0500.0>	0900.0>	11/1/2007
100				STATE OF THE STATE OF			(A)8-WM	Date
(A) Pr-WM	DF-WW	ET-WW	MW-12	FF-WW	OF-WW	6-MW	.8 8-WM	Sampling

- 2. Lead concentrations in bold represent positive detections above the laboratory detection limit. Motes:
 1. All lead concentrations in mg/l.
- 3. Lead concentrations exceeding MDEQ Tier 1 Groundwater MCL for lead (0.015 mg/l) are shaded.

Table 4 Hq

Groundwater Investigation Former Gulfport Fertilizer Site Gulfport, MS

6.21	08.2	68. A	4.36	3.78	3.74	3.20	egsnevA Hq
£4.8	6.20	62.2	69.4	66.£	18.6	3,46	1102/62-72/9
21.8	87. 2	5.11	74.4	63.E	3.47	7E.E	12/1-2/2010
9Y.B	55.5	67. 4	90.⊅	9Z.E	3.20	97.S	6/14-15/2010
27. 3	19.3	98.4	80.4	31.6	90.£	96.S	12/2/2009
12.8	97.3	96.4	44.4	17.6	95.5	3.20	12/9/2008
£2.9	1 8.3	7 <i>1.</i> .4	4:32	3.6	3.64	82.E	11/1/2007
02.9	12.9	69.4	47.4	37.5	98.E	3.27	2/17/2006
3 £.9	06.3	97'7	4.27	36.6	38.6	3.24	3/4/5004
7 4 .8	29.3	77.4	Sp.4	80.4	36.5	3.34	12/2/2003
₽Z.9	58.3	₽ 7 '₽	81.4	88.6	66.E	3,16	9/11/2003
60.9	06'9	07.₽	80.4	£8.E	37.5	3.10	6/12/2003
66.3	88.3	86.4	4.32	Z0.4	4.15	3.25	4/2/2003
04.8	07. 3	90.3	64.43	86.E	16.5	3.26	12/2-9/2002
££.8	98.3	€6.4	94.4	40.4	3.94	3.24	12/12/2002
£Z.9	14.2	90.3	14.4	36.5	36.6	3.22	2002/61/9
Z-WM	9-WM	g-MM	₽-WM	E-WM	Z-WM	F-WM	Sampling etsO

49.4	4.23	70.4	66.8	4.25	4.23	97.4	80.8	egstevA Hq
49. 4	benobnsdA	4.00	5.02	4.03	£.4	78.4	80.2	1102/62-72/9
î	88.£	58.6	9.4	3.75	3.75	4.25	Zp.4	12/1-2/2010
	87.£	40.4	86.4	3.44	3.71	41.4	97'7	6/14-15/2010
	67.ε	3.72	76.£	37.6	3.18	ZÞ.4	4.85	12/2/2009
y.	01.4	40.4	76.8	14.4	4.24	10.3	9.04	12/9/2008
	95.4	1.4	10.8	60.4	12.4	G.4	11.3	11/1/2007
(A)&t-WM	br-ww	MW-13	MW-12	FF-WW	O1-WW	6-MM	8 8-WM (A)8-WM	Sampling ets Date

 $\underline{\text{\it Notes:}}$ 1. All pH readings are expressed in standard units.

LIST OF FIGURES

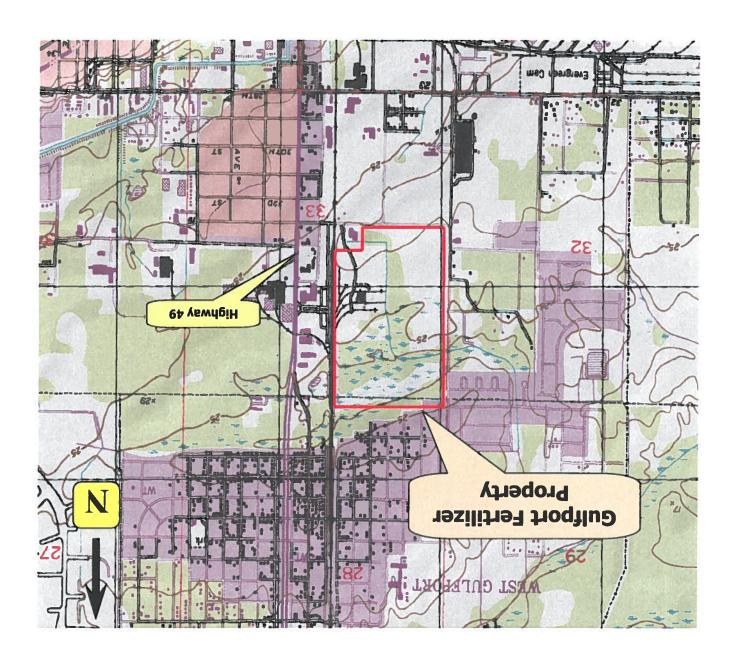
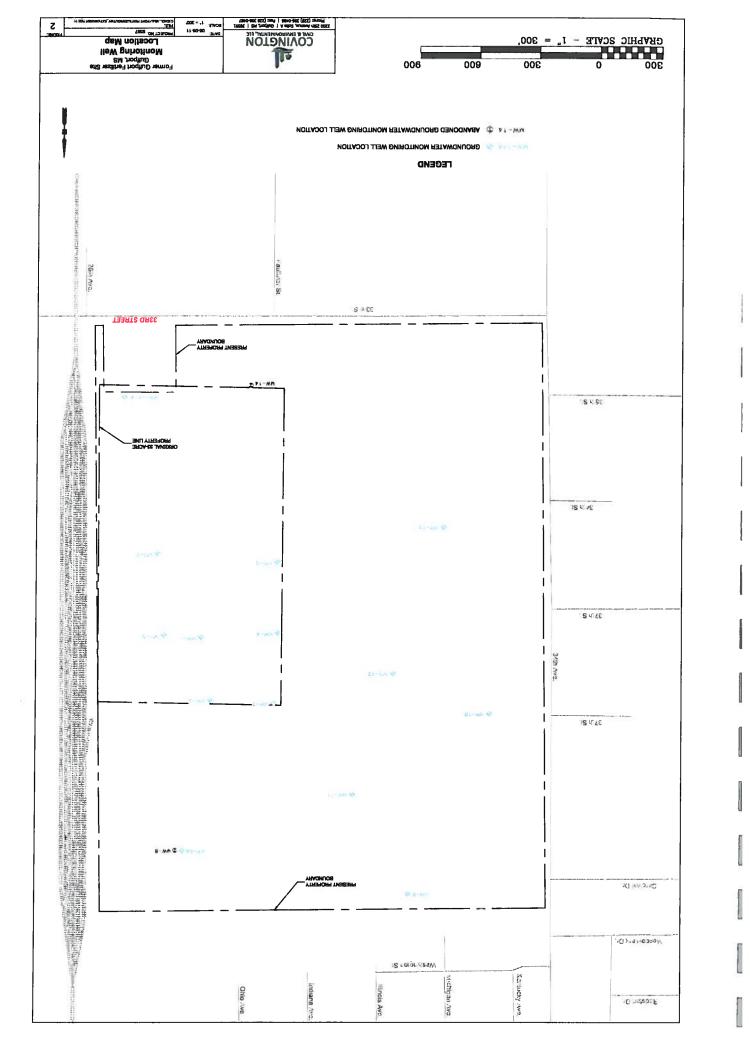
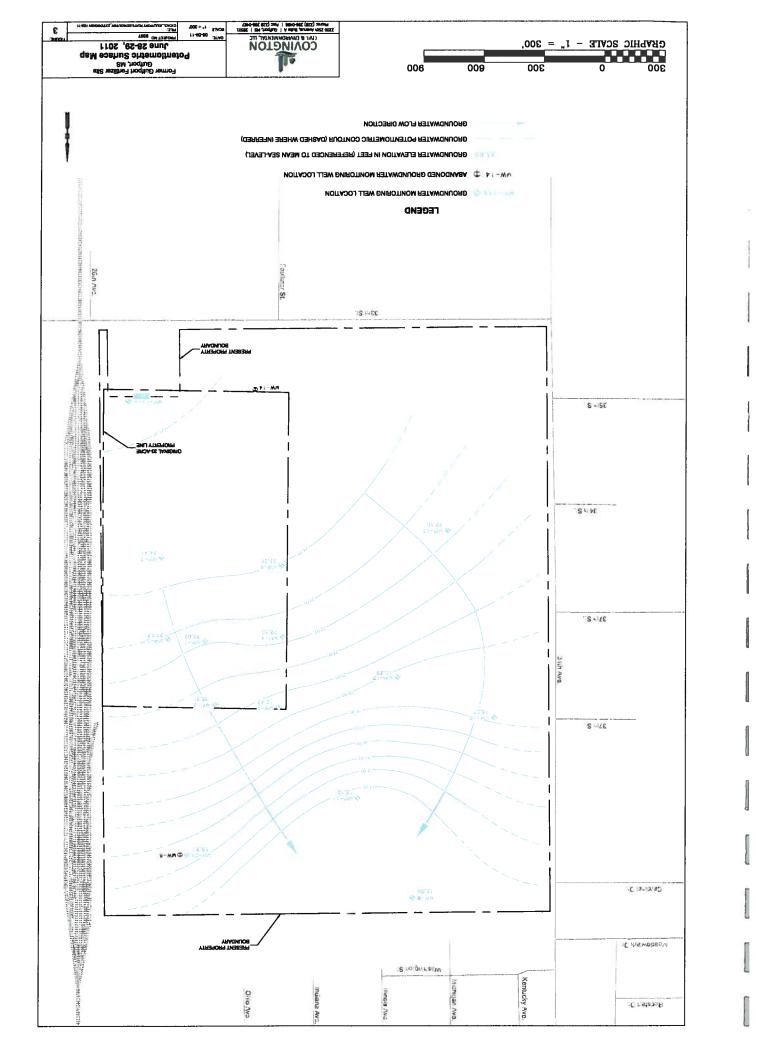
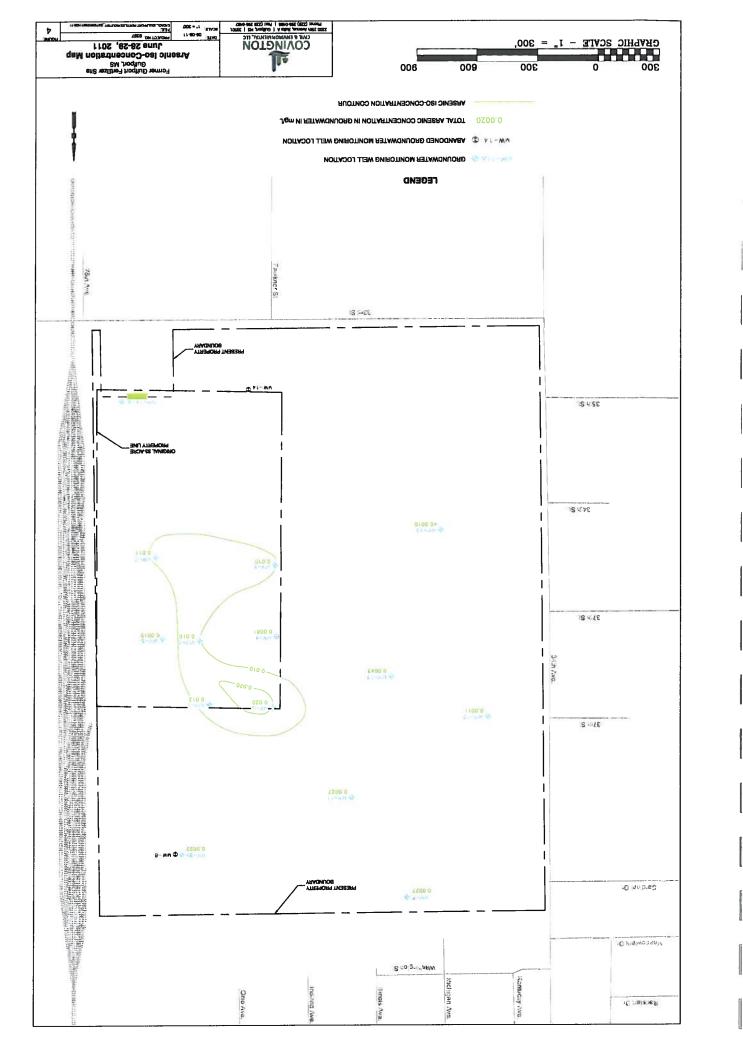
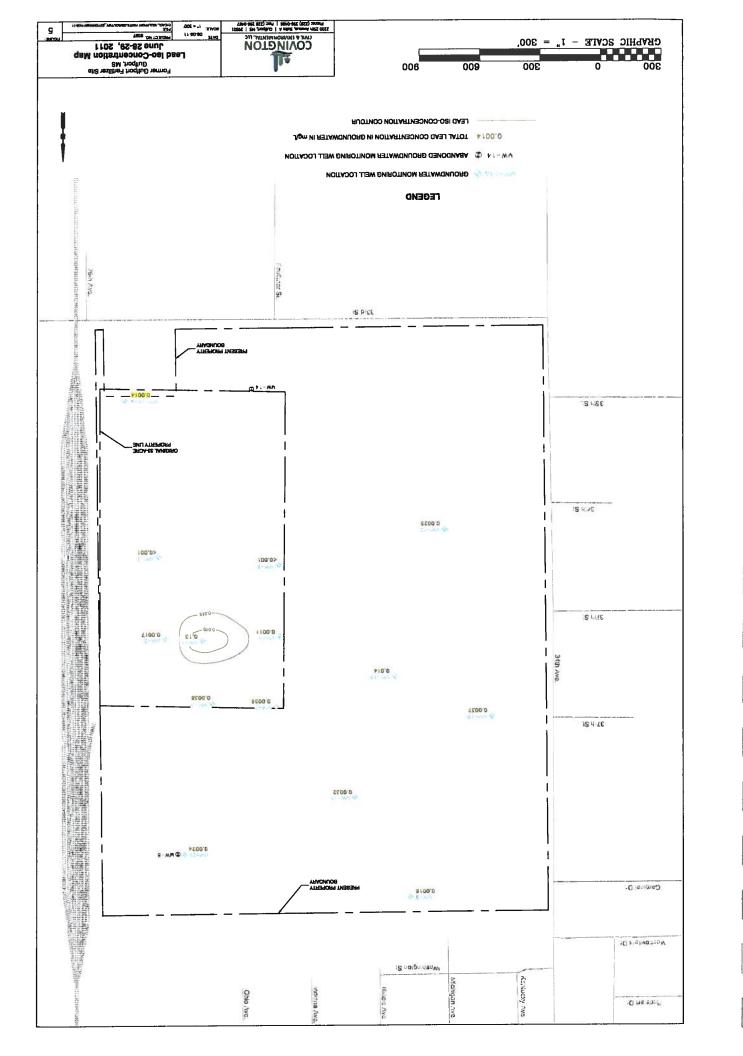


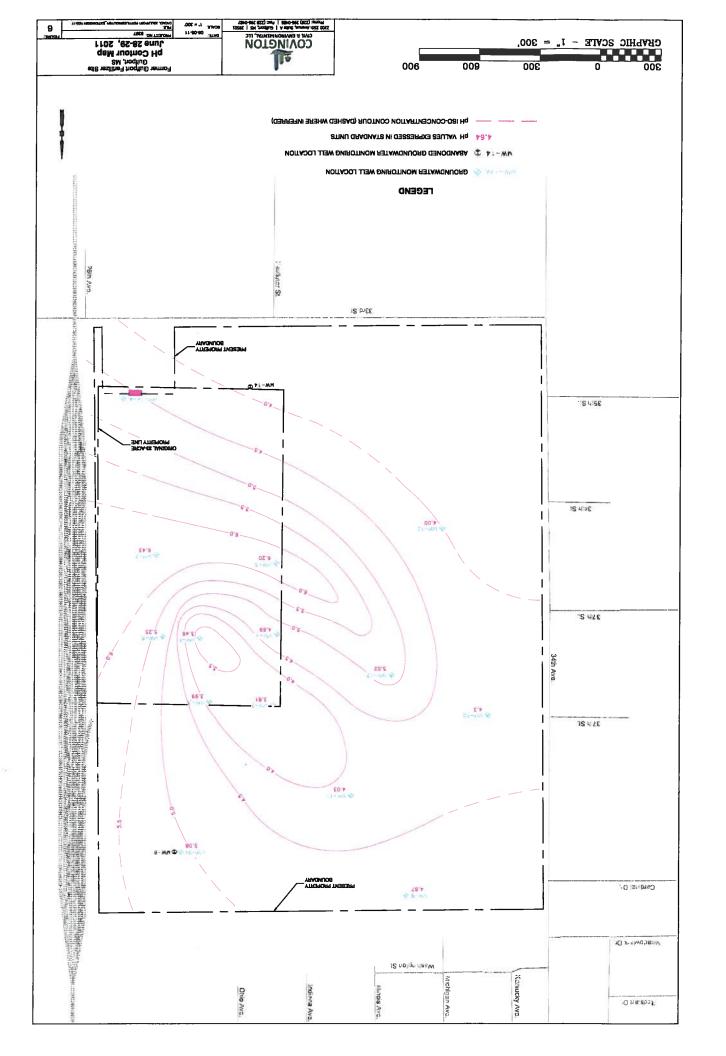
Figure 1 - Site Location Map Gulfport Fertilizer Site U.S.G.S. 7.5-Minute Quadrangle Map Gulfport North, Mississippi 1994 CAC Project # 9397











A XIQN344A

Well Sampling Field Data Sheets

2				Pass Christian, MS	ı, MS			
Sampling Date:		CAC Project No.		9397		City:	Gulfnort	
Page 1		CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	MS	
pH Meter No.				Jien dinhama	Cariol No			
Conductivity Meter No.	r No.				Serial No.			
Turbidity Meter No.	•				Serial No.			
				Well information	don			
Weil No.	Well	Top of Casing	Ground	Top of Screen	밁	Water	Water Level	Woter
	(Inches)	(Feet)	(Feet)	(Feet)	Elevation (Feet)	(Feet)	Elevation	Column
MW-2	2"	28.75	25.89	20.95	10.95	274	* a . A .	2 (Feet)
Well Casing Construction:	uction:					۱.	11.40	8 0
	;		(Water Co	Calibration for Well Volume Water Column, in Feet X 7 481 X Well Middle Column	Volume			
	3/4" Well			2" Well			6" Well	
Well Wulliplier:	Chick	0.023	Well Multiplier:		0.163	Well Multiplier:		1.469
Well Multiplier (Gallons):	er (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons)	iume = Water Column X Well Multiplier (Gallons):	~ %	Well Volume = Water Column X	Jime = Water Column X Well Multiplier (Callons):	•
Well Volumes X 3 (Gallons)	allons):		Well Volumes X 3 (Gallons):	Sallons):	1,20	Y Samilov llaw	es X 3 (Gallons):	
Min. Volume to be Purged (Gallons):	rged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons);	7.7	Min. Volume to be I	e to be Purped (Gallons):	
Purging Methodology:	gy:			Sampling information	4			
Time		Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
(Hr:Min)	(Min.)	(GallOlls)	(°C)	(mS/cm)	Oxygen (ppm)	PH	Reduction	Turbidity
12:18		0			A Figure 2		r Otellial (IIIA)	(410)
7:24		6.5	23.9	22	0.3	4	246	ā
12:28		-0	23.8	23	グウ		225	2
12:52		, 'S	24.0	23	4.0	9	247	þ
1000		1,0	24.0	22	0.3	3.90	248	7
44.7		220	220	7.4	0,3	3.79		w
67.76		J's	25.7	25	8,0	7.7%	237	W
ラン・クー		25		76	6.3	3.90	233	P
66132			7.7.7	26	0.2	3.8	231	3
Collegue	V200	S>	55:3					
•	a							
ilgnature of Field To	schnician:							
Signature of Field Technician:	echnician:							

7								
Sampling Date:		CAC Project No.		9397		City:	Gulfport	
Campier.		CAC Project Description:	ipuon:	Field Equipment	re	State:	MS	
pH Meter No.					Serial No.			
Conductivity Meter No	No.				Serial No.			
Turbidity Meter No.					Serial No.			
				빏	on			
Well No.	Well	Top of Casing	Ground	Top of Screen	Bot	Water	Water Level	Water
	(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
MW-3	2"	30.26	27.46	21.32	11.32	3.10	0	אלי
Well Casing Construction:	uction:						3	. 9
			(Water Col	Calibration for Weil Volume (Water Column, in Feet X 7.481 X Weil Multiplier)	Volume X Well Multipliar)			
	3/4" Well			2" Well	İ		6" Well	
Well Walliplier:	Columbia	0.023	Well Multiplier:		0.163	Well Multiplier:		1.469
Well Multiplier (Gallons):	r (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	r Column X er (Gallons):	- 14	Well Volume = Water Column X	Column X	
Well Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons):	alions):		Well Volumes X 3 (Gallons):	mes X 3 (Gallons):	
Min. Volume to be Purged (Gallons):	rged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	H. NH	Min. Volume to be Pu	ne to be Purged (Gallons):	
Purging Methodology:	gy:			Sampling Information	. 1			
Time	Time Purged	Purged Volume	Field	Conductivity	Dissolved	Field	Охудеп	Field
(Hr:Min)	(Min.)		(°C)	(mS/cm)	(ppm)	1	Potential (mV)	(NTU)
18:46	بم							
15:53		7.5	7.7	٩٢	7	4.01	301	ع
55:51		0.0	24.6	ಬ್ಬ	7	3.97	301	Šē.
13:57		עניי	2, H	22	1	7.go	295	0
500		0.0	4.16	150	F	4.00	392	0
16.00		2.5	1.20	8	2	8 r	220	0
CO: 41		0	74.	E	,	4.00	88 E	0
6		H.S	7.5-6	50	i	200	288	0
4	0	, ,	+					
5	San plan	راه) که	66. 40					
Signature of Fleld Technician:	echnician:	大事	7					
	1							Page 1 of 2
								rage or 2

	Signature of Field Technician:	124 6 12 12 12 12 12 12 12 12 12 12 12 12 12	2.10 2.0 1.2 4.64	6.5 6.5 6.4	22 /59 1.3 2.36	3.5 22.1 57 1.2 9.66	3.0 22.0 53 0.9 4.66	21.5 57 0.7 4.10	79.4 9.8 +5	2).4 57 0.5 4.58	1.0 72 57 0.5 4.55	13:05 0.6 22.2 57 0.5 4.41 3	(°C) (mS/cm) (ppm)	rime Purged Volume Field Conductivity Dissolved Field C	hodology:	Min. Volume to be Purged (Gallons): Min. Volume to be Purged (Gallons): 5, 7 Min. Volume to be Purged (Gallons):	Well Volumes X 3 (Gallons): Well Volumes X 3 (Gallons): Well Volumes X 3 (Gallons):	Well Multiplier (Gallons):	Well Wolling = Water Column X	3/4" Well 2" Well	Calipra (Water Golumn, in	•	28.28 25.93 20.40 10.40 6.15	(Feet) (Feet) (Feet) (Feet)	Well No. Well Top of Casing Ground Top of Screen Bottom of Screen Water	Weil Information	Conductivity Meter No.	pH Meter No. Serial No.	1-8c	CAC Project Description: Gulfport Fertilizer Site State:	Sampling Date: 6 Cac Project No. 9397 City: Guifport
			13 4.69	3 2.66	3 2.36	2 9.66	4.	7 4.	6 4.	4	5 4.0	5 4.	-			Min. Volume to be F	Well Volumes X 3 (73 Well Multip			lultiplier)									State:	City:
			84	7.8	20.	73	2.6	778	3.6	63	25	12	Potential (mV)	Reduction		urged (Gallons):	Sallons):	olier (Gallons):	Pr Column V	6" Well			72.17	(Feet)	Elevation					MS	Gulfport
Page 1 of 2			8	70	th	Ş	=	V	6	1 2.	o	ù	(UTV)	Field Turbidity					1.469			ļ	11.33	(Feet)	Column						

Sampling Date: C	23 4		CAC Project No.		9397		City:	Gulfport	
Sampler: LL	101	0	CAC Project Description:	otion:	Gulfport Fertilizer Site		State:	SW	
					Field Equipment	ant			
pH Meter No.						Serial No.			
Conductivity Meter No.	No.					Serial No.			
Turbidity Meter No.						Serial No.			
					Well Information	OTI			
Well No.	Well Diameter		Top of Casing Elevation	Ground Elevation	Top of Screen Elevation	Bottom of Screen	Water	Water Level	Water
	(Inches)		(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
S-AAM	2"		32.10	29.25	23.19	13.19	22.0	22.77	9 38
Well Casing Construction:	uction:								
				(Water Co	Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Mutfoller)	Volume 1 X Well Muificiler			
	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):	r Column X er (Gallons):			Well Volume = Water Column X Well Multiplier (Gallons):	er (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons	me = Water Column X Well Multiplier (Gallons)	
Well Volumes X 3 (Gallons):	allons):			Well Volumes X 3 (Gallons):	Sallons):	1:56	Well Volumes X 3 (Gallons):	allons):	
Min. Volume to be Purged (Gallons):	irged (Gallon	S):		Min. Volume to be Purged (Gallons):	urged (Gallons):	4.68	Min. Volume to be P	to be Purged (Gallons):	
Purging Methodology:	gy:				Sampling Information				
Time	- 1		Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
(Hr:Min)	(Min.)	- 6	(Gallons)	emperature (°C)	(mS/cm)	Oxygen (ppm)	Ţ	Reduction Potential (mV)	Turbidity
1:35	5								
1:45	-	_	נג פ	23.8	38	٥.۵	5.08	200	િ
1747	7		N	23.9	45	0.4	· I	50 5	_
1:50	18	_	r Ö	23.9	99	h Orman		ည္ ၀	9
1:53	2		ار دخ	23 A	مم	૭. પ	12.50	199	
1:55	5		۲.O	ر ا رود	28	0.5	5,23	26 1	グ
7:57	4		عرير	١.٣٤	39	0.5	he.2	461)
1:59	74		5.0	ب ا	40	0.5	5,25	76)	0
		_							
00.C	Sex	6							
		1-							
Signature of Field Technician:	echnician:	Ŋ	The	4	\				
1000		1							

Page 1 of 2					()		/	1
			3	In	1		echnician:	Signature of Field Technician:
					1			
			4	4.4		┪	-	
			1		callage	40(50	3	ec: 31
}	12.6	6.40	ق	ī	2.	0		71601
> -		05.0	Ī	11/	300	1/C		
	103	6.41	16	20	23.	, ki		3116
7	78	6,22	9	200	23.2	3.8		15:00
60	6	989	.4	73	7.55	2.4		10:51
エコ	Q2	25-2	Ŋ	74	1.86	44		10:07
41	3 h	65.1	נ	75	وبدد	_		15:00
								14:56
(NTU)	Potential (mV)		(ppm)	(mS/cm)	(°C)		(Min.)	(Hr:Min)
Field Turbidity	Oxygen Reduction	pH d	Oxygen	Conductivity	Temperature	(Gallons)	Purged	Ime
				Sampling Information				Purging Methodology:
	rged (Gallons):	Min. Volume to be Purged (Gallons):	7	urged (Gallons):	Min. Volume to be Purged (Gallons):		rged (Gallons):	Min. Volume to be Purged (Gallons):
	allons):	Well Volumes X 3 (Gallons):		Sallons):	Well Volumes X 3 (Gallons):		allons):	Well Volumes X 3 (Gallons):
	lell Multiplier (Gallons):	Weil Multipli	15.1	er (Gallons):	Well Multiplier (Gallons):		r (Gallons):	Well Multiplier (Gallons):
1.469	<	Well Multiplier:	0.163	Column Y	Well Wultiplier:	0.023	Column X	Well Volume = Water Column X
	6" Well			2" Well			3/4" Well	
			1 X Well Multiplier)	Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Multiplier)	(Water Co			
	4	F45.8C					uction:	Well Casing Construction:
9.56	1	16.3	15.34	25.34	31.23	34.29	2"	MW-6
(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Inches)	
Water	Water Level	Water	Bottom of Screen	Flevation	Flavation	Elevation	Diameter	Well No.
			ion	Well Information				
			Serial No.					Turbidity Meter No.
			Serial No.				No.	Conductivity Meter No.
			Serial No.					pH Meter No.
				Fleid Equipment			1	
	MS .	••		Gulfport Fertilizer Site		CAC Project Description:	110	Sampler:
	Gulfport	City:		9397		CAC Project No.	12) 11	Sampling Date: 💪
			7 100	1 ago Citionally				

Page 1 of 2			9		/	<	7	
	(3,13	70	(1) Mw-	JUN ,		How	echnician:	Signature of Field Technician:
			4	en Seetan	a ma		100	Cal More
			5	-	7)	7	175	Service A
43	41	6.43	0,4	#5	23.4	20	22	1.16
رب ا	ج ع	6.41	0.Н	7.5	23.3	71.37	رر	41:1
12	ተል	(7.9	0, 보	55	73.4	E. 0	עם	1:09
Ŋ	50	んから	о.ч	56	٦.٤ر	v	10	1267
بر 1	។។	(t.4)	0.4	SS	۲. ۲.	, o	L	20:1
74	29	۲.2.۶	٥.५	00	23.6	タグ	-9	1:03
۲۲	ر د	6.43	0.8	74	J. 44	٥.د		レン・プ
112	δ ⁶	7,44	5,0	67	3,56	- :4	0	25:20
()0	29	6.48	۲.0	٤3	23.5	1.0	000	12:53
							0	12:47
(NTU)	Potential (mV)	•	(ppm)	(mS/cm)	(°C)		(Min.)	(Hr:Min)
Field	Oxygen	Field	Dissolved Oxygen	Conductivity	Field Temperature	Purged Volume (Gallons)	Purged	lime
	3-17		augi.	Campania Branch				Purging Methodology:
	ne to be Purged (Gallons):	Min. Volume to be Pu	4.3	urged (Gallons):	win. volume to be Purged (Gallons)		urgeo (Gallons):	with volume to be Furged (Gallons):
	allons):	Well Volumes X 3 (Gallons):	6.6	allons):	Well Volumes X 3 (Gallons):		allons):	Well Volumes X 3 (Gallons):
	Well Multiplier (Gallons):	Well Multipl	48.5	er (Gallons):	Well Multiplier (Gallons):		er (Gallons):	Well Multiplier (Gallons):
1.469	r Column X	Well Volume = Water Column X	0.163	r Column X	Well Volume = Water Column X	0.020	r Column X	Well Volume = Water Column X
	6" Well			2" Well	MACH MACHINE	0000	3/4" Well	Well Muliplier
			Volume X Well Multiplier)	Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Multiplier)	(Water Col			
							uction:	Well Casing Construction:
48.5	20.01	40.7	14.54	24.54	30.75	33.48	2ª	MW-7
(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Inches)	
Water	Water Level	Water	Bottom of Screen	Elevation	Elevation	Elevation	Diameter	Weil MO.
			n	Well Information			100	MC II N
			Serial No.					Turbidity Meter No.
			Serial No.				No.	Conductivity Meter No.
			Serial No.					pH Meter No.
			nt	Field Equipment				Н
	MS		ite	Gulfport Fertilizer Site	iption:	CAC Project Description:	y L L .	Ŧ.
	Gulfport	City:		9397		CAC Project No.	123/11	Sampling Date: 6
	00000							

Sampling Date:	CAC Project No.		9397		City:	Gulfport	
Sampler: LL O I I	CAC Project Description:		Gulfport Fertilizer Site	ite	State:	MS	
HAL			Field Equipment	nt			
pH Meter No.				Serial No.			
Conductivity Meter No.				Serial No.			
Turbidity Meter No.				Serial No.			
			围	On			
Well No. Well Diameter	Top of Casing Elevation	Ground Elevation	Top of Screen Elevation	Bottom of Screen Elevation	Water	Water Level	Water
(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
MW-8 (A)	22.54		15.20	5.20	んだ	1522	2 34
Well Casing Construction:							
		(Water Col	Calibration for Well Volume (Water Column, in Feet X 7 481 X Well Multiplier)	Volume			
3/4" Well			2" Well			6" Well	
Well Multiplier:	0.023	Well Multiplier:		0.163	Well Multiplier:		1.469
vveli volume = vvater Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons)	r Column X er (Gallons):	20.07	Well Volume = Water Column X Well Multiplier (Gallons	me = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):		Well Volumes X 3 (Gallons):	allons):	1,63	Well Volumes X 3 (Gallons):	Gallons):	
Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	4	Min. Volume to be F	to be Purged (Gallons):	
Purging Methodology:			Sampling Information	ation			
- 1	Purged Volume	Field	Conductivity	Dissolved	Field	Охудел	Field
(Hr:Min) (Min.)	(Gallons)	lemperature (°C)	(mS/cm)	Oxygen (maa)	PH	Reduction Potential (mV)	Turbidity
子: 48	Ø						
7: 64		1.14	<u>ر</u>	iq	۲۶.۶	7 6 (5:00
72.5	1.5	۶.۱۲	16	S	5,13	ນ	2.4
7:58	ည.ဝ	2.5	16	٠ د	5:2	251	2
7.01	۲,5	21.3	16	÷	5.16	191	2
8.03	3.0	ر. ت	16	٦.	5.09	189	_
50.5	3.5	ייינג	7	£	5.09	261	16
10:3	0.5	21.2	16	£	S.Q	101	00
4:09	e co	4.16	6	٠,	•]	187	57
)		•				
	6) (6)						
		4					
Signature of Field Technician:	2						
		4					

Page 1 of 2

				Pass Christian, MS	MU			
Sampling Date:	11811	CAC Project No.		9397		City:	Gulfport	
Sampler: 1271	14	CAC Project Description:		Gulfport Fertilizer Site	ite		MS	
pH Meter No.					Serial No.			
Conductivity Meter No.	No.				Serial No.			
Turbidity Meter No.					Serial No.			
				Well Information	no			
Well No.	Well	Top of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water
	(inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
6-MW	2"	22.64		16.13	6.13	75.01	70 05	26 2
Well Casing Construction:	uction:							
			(Water Col	Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Multiplier)	Volume X Well Muitiplier)			
	3/4" Well			2" Well			6" Well	
Well Volume = Water Column X	r Column X	0.023	Well Volume = Water Column X	r Column X	0.163	Well Volume = Water Column X	Column X	1.469
Well Multiplier (Gailons):	ar (Gallons):		Well Multiplie	er (Gallons):	5,52	Well Multipl	Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons)	allons):	0,0	Well Volumes X 3 (Gallons):	allons):	
Min. Volume to be Purged (Gallons):	irged (Gallons):		Min. Volume to be Purged (Gallons):	rrged (Gallons):	7.8	Min. Volume to be Pu	to be Purged (Gallons):	
Purging Methodology:	gy:			Sampling Information	ation			
Time	Time Purged	Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved Oxygen	Field	Oxygen Reduction	Field Turbidity
(Hr:Min)	(Min.)		(°C)	(mS/cm)	(ppm)		Potential (mV)	(NTU)
8,70		0						
おって	•	2.0	25.)	3	ゆや	5.04	66	130
8.30		1,0	77.7	273	1.0	2.68	god	7.7
22.00		7	72.7	21.	0,0	2.05	707	12
g		2.0	727	A	0.6	2.64	127	2,
22.5		7.5	215	.13	2.0	4.87	133	14
8.01		3,0	22.5	21.	0,6	4.97	36	۲),
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	2) <	0 1	6					
collec	1000	5	1					
College	THE OF	からの	Ú					
		1						
Signature of Field Technician:	echnician:	2) the						
	7							Page 1 of 2
								ישעמ - טויע

	Signature of Field Technician:			W:W	15 209	210	45.0	(0:23	42:01	10:16	10:13	0.10	90:01	(Hr:Min)	Ime	Purging Methodology:	wiii. voidine to be ruiged (Gallons):	Wie Volume to be Burned (Well Wollings X 3 (G	Well Multiplier (Gallons):	Well Multiplier:			Well Casing Construction:	-MW-10		Well No.		Turbidity Meter No.	Conductivity Meter No.	pH Meter No.		Sampler: 2+	Sampling Date: 8
	Fechnician:		4	K	1									(Min.)	Purged		urgeo (Galloris).	onions).	allone).	er (Gallons):	Chima	3/4" Well		uction:	2"	(inches)	Diameter			No.			<i>/u.</i>	128 N
(7		Cottra	4.0	, in	20	2.5	2.0	1.5	4.5	Q S	9		Purged Volume (Gallons)						0.023				27.69	(Feet)	Elevation						CAC Project Description:	CAC Project No.
	mu	B		かり	4.07	28.8	23.8	23.4	23.5	ニュ	2.95	294		(°C)	Temperature		Mill. volume to be Fulged (Gallons):	Weil Volumes A 3 (Genous).	Wiell Wellings Y 2	Meil Weil Muitin	Well Multiplier:		(Water C			(Feet)	Elevation						ription:	
6	12)		V	3	30	30	53	30	8	<i>5</i> 0	90		(mS/cm)	Conductivity		Sampling Information	Gallona).	Callogs):	Well Multiplier (Gallons):	China	2" Well	Calibration for Well Volume (Water Column, In Feet X 7.481 X Well Multiplier)		19.73	(Feet)	Elevation	Well Information				Field Equipment	Gulfport Fertilizer Site	9397
	A				20	0,5	0,6	Ď. 6	5.4	20	1.3	1,5		(ppm)	Dissolved Oxygen		mation O++ I		7.2	96.30	0.163		ll Volume 81 X Well Multipiler)		9.73	(Feet)	Elevation	lion	Serial No.	Serial No.	Serial No.	ent	Site	
					25.2	er. 2	4.30	4.26	45.4	4.30	4.29	4.32			PH	12	IMIT. Volume to be Purged (Gailons):	Well Volumes A 3	Woll Volumen Y 2	vveil voiume = water Column X Well Multiplier (Gallons	Well Multiplier:				9.6	(Feet)	Level						State:	City:
					272	220	262	266	214	762	255	247		Potential (mV)	Oxygen Reduction		ourged (Gallons):	es A 3 (Gallons):		e = vvater Column X /ell Multiplier (Gallons):		6" Well			1809	(Feet)	Elevation						MS	Gulfport
Page 1 of 2					7	~	5	279	17.	53.4	70	1 60		(UTU)	Field Turbidity						1.469				8.38	(Feet)	Column							

	Signature of Field Technician:		4	7.7	4.12	4112	4.0.7	4.03	20.00	ナシュダ	もがあ	(Hr:Min)	Time	Purging Methodology:	Min. Volume to be Purged (Gallons):	Well Volumes X 3 (Gallons):	Well Multiplier (Gallons):	Well Multiplier:			Well Casing Construction:	11-WM		Well No.		Turbidity Meter No.	Conductivity Meter No.	pH Meter No.	(milpier.)	Sampler: 77	Camalina Opto
	echnician:											(Min.)	Time Purged	gy	inged (Gallons):	allons):	er (Gallons):	Column	3/4" Well		uction:	2,	(Inches)	Well			No.				1701
	1		6666	なくにつ	5.0	25	20	7.7	7.0	0,5	0		Purged Volume (Gallons)					0.023				22.85	(Feet)	Top of Casing						CAC Project Description:	loan project No.
	1			10 mg	21.3	2).4	なな	7.7	21,6	2い 年		ကို	Field Temperature		Min. Volume to be Purged (Gallons):	Well Volumes X 3 (Gallons):	Well Multiplier (Gallons):	Well Multiplier:		(Water Col			(Feet)	Ground							
	3			\mathcal{K}	87	40	86	48	98	034	CB	(mS/cm)	Conductivity	Sampling Information	urged (Gallons):	allons):	er (Gallons):	Column	2" Well	Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Multiplier)		15.05	(Feet)	Top of Screen	Well information				Field Equipment	Gulfnort Fertilizer Site	Pass Christian, MS
()	1/1/	1			8.4	4.0	0,0	\$\ 5\	6.6	1,2		(ppm)	Dissolved Oxygen	ation	2,2		678	0.163		Volume 1 X Well Multiplier)		5.05	(Feet)	Bottom of Screen		Serial No.	Serial No.	Serial No.	nt	The state of the s	
,	-X/	j /		,	4.00	16 2 C	3.89	7.97	3.64	3,36		3	Field		Min. Volume to be P	Well Volumes X 3 (Gallons):	Well Multip	Well Multiplier:				10.75	(Feet)	Water						State:	Clfo.
					2,4	51	51,5		156	327		Potential (mV)	Oxygen Reduction		e to be Purged (Gallons):	allons):	Well Multiplier (Gallons):	Columb V	6" Well			11, 83	(Feet)	Water Level						MS	Gulfnort
Page 1 of 2					7	3	8	2	7	P		(NTU)	Field Turbidity					1.469				6.78	(Feet)	Column							

Sampling Date: $b/2$	1/8	CAC Project No.		9397		City:	Gulfport	
Sampler:)2)+)2	ì	CAC Project Description:		Gulfport Fertilizer Site	ite		MS	
81.8				Field Equipment	nt			
pH Meter No.					Serial No.			
Conductivity Meter No.					Serial No.			
Turbidity Meter No.					Serial No.			
					SIN .			
Well No.	Well Diameter	Top of Casing	Ground	Top of Screen	Bottom of Screen	Water	Water Level	Water
	(Inches)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)
NW-12	2"	28.92		20.95	10.95	10.20°	7.4.31	かって
Well Casing Construction:	ה:							-
			(Water Coi	Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Multiplier)	Vofume 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):	Imn X Ilons):		Well Volume = Water Column X Well Multiplier (Gallons):	r Column X er (Gallons):	125	Well Volume = Water Column X Well Multiplier (Gallons	ume = Water Column X Well Multiplier (Gallons);	
Well Volumes X 3 (Gallons)			Well Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons):	ailons):	
Min. Volume to be Purged (Gallons):	(Gallons):		Min. Volume to be Purged (Gallons):	rged (Gallons):	マ・17		to be Purged (Gallons):	
Purging Methodology:				Sampling Information	ation			
- 1	Time	Purged Volume	Field	Conductivity	Dissolved	Field	Охудеп	Field
(Hr:Min)	(Min.)	(Gallons)	(°C)	(mS/cm)	Oxygen	뭐	Reduction Potential (mV)	Turbidity
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oliginature of French Recillician:	Clare	7	A P					
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Page 1 of 2					1		•	1
				4	\$ 2	- Period	chnician:	Signature of Field Technician:
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1	230	2.12	ς, 5,	4	74.7	20		956
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	207	4.24	2.0	4	23.7	8.0		244
						0		2000
	Potential (mV)		(ppm)	(mS/cm)	(°C)		(Min.)	(Hr:Min)
	Reduction	DH Tield	Oxygen	Conduction	Temperature	(Gallons)	Purged	į
				Sampling Information				Purging Methodology:
1	e to be Purged (Gallons):	Min. Volume to be Pr	6.2	urged (Gallons):	Min. Volume to be Purged (Gallons):		rged (Gallons):	Min. Volume to be Purged (Gallons):
	Sallons):	Well Volumes X 3 (Gallons):	ب ند	allons):	Well Volumes X 3 (Gallons):		allons):	Well Volumes X 3 (Gallons):
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		Well Multiplier:	0.163		Well Multiplier:	0.023	China	Well Multiplier:
- 1	6" Well			2" Well			3/4" Well	
1			Volume X Well Multiplier)	Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Multiplier)	(Water Co			
							ıction:	Weil Casing Construction:
	22.16	16.2	14.30	24.30		32.36	21	MW-13
	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Feet)	(Inches)	
	Water Level	Water	Bottom of Screen	Flevation	Elevation	Elevation	Diameter	EAGH NO.
			ă	Well information				MACHINA MACHINA
			Serial No.					Turbidity Meter No.
			Serial No.				No.	Conductivity Meter No.
			Serial No.					pH Meter No.
			nt	Field Equipment				
	MS	State:	ite	Gulfport Fertilizer S	iption:	CAC Project Description:	7	Sampler: COV
' I	Gulfport	City:		9397		CAC Project No.	122/11	Sampling Date:
ŧ								

Poplacent Well for MW- (4 (Now Abudund)

	Signature of Field Technician:	1 4301	201100	1006	700	958	454	458	200	7.57	822	4×2	020	(Hr:Mig)		Time	Purging Methodology:	Min. Volume to be Purged (Gallons):	Well Volumes X 3 (Gallons):	Well Multiplier (Gallons):	Well Multiplier:			Well Casing Construction:	MW-14 (A)		Well No.		Turbidity Meter No.	Conductivity Meter No.	pH Meter No.	L	ジ	Sampling Date: 6/24
_	ician:	Jak 1	2									ļ 	1	(Min.)	Purged	Time		(Gallons):	, s.	illons):	<	3/4" Well		12.	21	(Inches)	Well		ACK 3/2 5/2	10-10	1350			
	7	1	-	4.5	ois.	35	30	3.2	20	5.	0	2.5	Ø		(Gallons)	Purged Volume		_			0.023			Thouse	34.08		Top of Casing		TANK OF	المراد الما	KEI NO		CAC Project Description:	CAC Project No.
Y.	my		200	74.1	20.00	243	74.20	24.0	24.20	24.20	200	20.6		(ဂိ	Temperature	Field		Min. Volume to be Purged (Galtons):	Well Volumes X 3 (Gallons):	Well Multiplier (Gallons):	Well Multiplier:		(Water Coli			(Feet)	Ground		econded	1 company	to Sleak-1			
1	21/-			-	n	()	_; _;	-	Ξ,	-	-	Ù		(mS/cm)		Conductivity	Sampling Information	rged (Gallons):	allons):	r (Gallons):	2	2" Well	Calibration for Well Volume (Water Column, in Feet X 7.481 X Well Multiplier)	Program A	(25.83)	(Teep)	Top of Screen	Well information	_	رع	٥	Field Equipment	Gulfport Fertilizer Site	9397
601	Judle	11 11		6.3	8. 3	0.4	2.3	£.'@	o vi	0.2	0.4	2.0		(ppm)	Охудел	Dissolved	tion	4.5	51	902	0.163		Volume X Well Multiplier)	- Sund	(15.83	(Feat)	Bott	ā	Serial No.	Serial No.	Serial No.	#	Te .	
	\			4.64	4.63	4.63	0.62	4.63	4.63	2	1.68	85.0			모	Field			Well Volumes X 3 (Well Wulli	Well Multiplier:				9.23	(Feet)	Water						State:	City:
				12.0	25	700	200	200	201	127	200	200		Potential (mV)	Reduction	Охудеп		to be Purged (Gallons):	es X 3 (Gallons):	Well Multiplier (Gallons):	· ·	6" Well			24.85	(Feet)	Water Level						MS	Gulfport
Page 1 of 2				P	13	5	11	12	5 3	do	FD OF	65		(UTU)	Turbidity	Field					1.469				9.02	(Feet)	Water							

APPENDIX B

Laboratory Analytical Report Sheets and

Chain-Of-Custody Forms

Tax I.D. 62-0814289 E9x (615) 758-5859 6989-191-008-1 Mt. Juliet, TW 37122 (615) 758-5858 12065 Lebanon Rd.

0761 .1s3



Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501 Mr. Lars Larson

Report Summary

Sunday July 10, 2011

Report Number: L523848

Samples Received: 06/30/11

Client Project: 9397.00

Describtion: Gulfport Fertillzer

The analytical results in this report are based upon information supplied questions regarding this data package, please to not hesitate to call.

Entire Report Reviewed By:

Craig Cothron , ESC Representative

Laboratory Certification Numbers

TX - II04J04Z42' OK-6612 W1 - 04J-666-262' NX - 11J4Z' MI - 668063610' NX - IN00003Z008B' W2 - 673' IN - C-IN-01' KX - 60010' KXNZI - 0016' NC - ENA3J2\DMSIJ04' ND - B-140 W3 - 1461-01' YIHW - 100J86' YF - 40000' CW - 1-53ZJ' CI - 5H-016J' EF - 58J48J

hy ESC Lab Sciences. yeareditation is only applicable to the test methods specified on each scope of accreditation held

Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

This report may not be reproduced, except in full, without written approval from ESC Lab Sciences. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.

sage 2 of 20

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

Arsenic Arsenic, Dissolved Lead Lead, Dissolved	110,0 108 108 108	0100.0 0100.0 0100.0 0100.0	1/pm 1/pm 1/pm 1/pm	9050 9050 9050 9050	TT/S0/L0 TT/T0/L0 TT/S0/L0 TT/T0/L0	I I I
Arsenic, Dissolved	BDL	0100.0	Ţ/6w	6020		11/50/10

Dīī. Date Метрод Units Det, Limit Result Рагамесег L. Larson 06/27/11 13:13

Collected By : Collection Date :

L-MW Sample ID

June 30, 2011 Gulfport Fertilizer Description Date Received

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

REPORT OF ANALYSIS

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Project # : 9397.00

ESC 29mbje # : F253848-01

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July 10, 2011

Tax I.D. 62-0814289

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

F.V.B S.C.I.E.N.C.E.S

YOUR LAB OF CHOICE

Lead, Dissolved

Collected By : Collection Date :

Gnjfport, MS 39501 Mr. Lars Larson Covington & Associates 2200-A 25th Avenue

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Parameter

Sample ID

Describtion Date Received

Arsenic, Dissolved

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

The reported analytical results relate only to the sample submitted.

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BDL - Below Detection Limit (PQL) Det. Limit - Practical Quantitation Limit (PQL) Note:

Page 3 of 20

ESC 29mbje # : r253848-05

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July 10, 2011

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Project # :

Site ID :

REPORT OF AUALYSIS

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Result

L. Larson 06/27/11 14:00

June 30, 2011 Gulfport Fertillzer

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Tax 1.D. 62-0814289

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11/50/10

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6582-887 (813) X63 6589-L9L-008-I Mt. Juliet, TW 37122 (615) 758-5858

12065 Lebanon Rd.



Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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BDL - Below Detection Limit (PQL) Det. Limit - Practical Quantitation Limit (PQL)

Page 4 of 20

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Dil.

11/80/10

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11/10/10

Date

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Tax I.D. 62-0814289

Eax (615) 758-5859 6585-L9L-008-T Mt. Juliet, TN 37122 (615) 758-5858 12065 Lebanon Rd.

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Project # :

ESC Sample # :

July 10, 2011

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REPORT OF ANALYSIS

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BDL

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Lead, Dissolved

Arsenic, Dissolved Arsenic

Рагаметег

Sample ID

D. Larson 06/27/11 14:51 Collected By : Collection Date :

WM-J

June 30, 2011 Gulfport Fertillzer Description Date Received

engtbort, MS 39501

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue

YOUR LAB OF CHOICE

F. V. B. S.C.I.E.N.C.E.S



YOUR LAB OF CHOICE

Lead, Dissolved Arsenic, Dissolved Lead

> Collection Date: Collected By

Arsenic

Parameter

Sample ID

Describiton

Date Received

Mr. bars barson Covington & Associates 2200-A 25th Avenue Gulfport, Ms 39501

0100.0 0100.0 0100.0

0100.0

Det. Limit

BDF

2600.0

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Result

06/27/11 15:20

Gulfport Fertillzer

30, 2011

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July 10, 2011

9050 9050

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Project # : 9397.00

ESC Sample # : L523848-04

Page 5 of 20

SEPORT OF ANALYSIS 0761 .Jes

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Units

Tax I.D. 62-0814289

II/S0/L0 II/I0/L0

TT/S0/L0

11/10/10

Date

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Eax (615) 758-5859 6585-L9L-008-I Mt. Juliet, TN 37122 (615) 758-5858 ISO65 Lebanon Rd.

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit (PQL)
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The reported analytical results relate only to the sample submitted.
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This reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Vole:

T T T	TT/S0/L0 TT/T0/L0 TT/S0/L0 TT/T0/L0	9020 9020 9020 9020	1/6m 1/6m 1/6m 1/6m	0100.0 0100.0 0100.0 0100.0	E10.0 0E00.0 8E00.0 A20.0	Arsenic Arsenic, Dissolved Lead Lead, Dissolved
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Result

Det. Limit

06/27/11 16:10 L. Larson

Collected By :

Sample ID E-WM

June 30, 2011 Gulfport Fertillzer Describtion

Date Received

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

Parameter

REPORT OF ANALYSIS

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ESC Sample # : L523848-05

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July 10, 2011

Project # : 9397.00

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982#180-53 .Q.1 xsT

Date

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6585-857 (818) xs3 6585-L9L-008-T Mt. Juliet, TN 37122 (615) 758-5858 12065 Lebanon Rd. FIVE BICHERNICER

22 To T egs

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

This reported analytical results relate only to the sample submitted.

This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Mote:

mg/l mg/l mg/l 0100.0 0100.0 0100.0 0100.0 TT/S0/L0 9020 BDF Lead, Dissolved τ Arsenic, Dissolved Lead 0.011 0.0091 108 11/10/10 6020 11/90/10 6020 Vrzenic Ţ 11/10/10 0209 Det. Limit Рагамесег .Iiq ated Wethod Units Result

> L. Larson 06/27/11 00:00 Collected By : Collection Date :

23mple ID DNB-I

June 30, 2011 Gulfport Fertillzer Describtion

Date Received

Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501 Mr. Lars Larson

REPORT OF ANALYSIS

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Project # :

ESC Sample # :

July 10, 2011

site ID :

Tax I.D. 62-0814289

T253848-06

Egx (615) 758-5859 6585-L9L-008-1 Mt. Juliet, TW 37122 (615) 758-5858 12065 Lebanon Rd. F-V-B B-C-I-E-M-C-E-2

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

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BDL - Below Detection Limit (PQL) Det. Limit - Practical Quantitation Limit (PQL) Note:

T T	11/50/L0 11/10/L0 11/50/L0 11/10/L0	0709 0709 0709 0709	1/pm 1/pm 1/pm 1/pm	0100.0 0100.0 0100.0 0100.0	7200.0 10H 0000 0000	Arsenic Arsenic, Dissolved Lead Lead, Dissolved
Dil.	Date	Method	Units	Det. Limit	JinseA	Parameter

Collected By : L. Larson Collection Date : 06/28/11 00:00

CI əlqms2 DNB-S

dune 30, 2011 Gulfport Fertillzer Description Date Received

Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501 Mr. Lars Larson

site ID

Project # : 9397.00

ESC Sample # : L523848-07

July 10, 2011

REPORT OF ANALYSIS

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8814180-S3 .U.I xsT

6985-887 (818) xe3 6585-L9L-008-I 12065 Lebanon Rd. Mt. Juliet, TW 37122 (615) 758-5858 F.V.B. B.C.I.E.N.C.E.B

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Derection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

0100.0 0100.0 0100.0 0100.0 1/6m 1/6m 1/6m BDL 0.0024 0.016 11/90/40 9020 Lead, Dissolved II/IO/LO II/SO/LO 6020 Lead Arsenic, Dissolved 6020 6020 τ T/5w **Yrsenic** 11/10/40 0.0022 Ţ

Result

Det. Limit

L. Larson 06/28/11 08:10 Collected By : Collection Date :

> A8-WM Sample ID

Description

June 30, 2011 Gulfport Fertillzer

Date Received

Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501 Mr. Lars Larson

REPORT OF ANALYSIS

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ESC Sample # : L523848-08

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Project # :

July 10, 2011

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8824180-S3 .G.I xsT

Date

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Eax (615) 758-5859 6585-L9L-008-T 12065 Lebanon Rd. Mt. Juliet, TW 37122 (615) 758-5858 T. V.B. B.C.I.E.N.C.E.B

YOUR LAB OF CHOICE

Parameter

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

T T T	II/SO/LO II/IO/LO II/SO/LO II/IO/LO	0050 0050 0050 0050	1\pm 1\pm 1\pm 1\pm	0100.0 0100.0 0100.0	7200.0 Ide 100.0 8100.0	Arsenic Arsenic, Dissolved Lead Lead, Dissolved
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Dil. Date метрод Det. Limit Units Result Parameter

Collected By : Collection Date : L. Larson 06/28/11 08:41

6-MW Sample ID

June 30, 2011 Gulfport Fertillzer Description

Date Received :

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

REPORT OF AUALYSIS

0791 JeE

Project # : 9397.00

ESC Sample # : L523848-09

Site ID :

July 10, 2011

982 F180-S3 . G. I xsT

Mt. Juliet, TW 37122 (615) 758-5858 1-800-767-5859 5x (615) 758-5859 12065 Lebanon Rd.

F.V.B S.C.I.E.N.C.E.S

Page 14 of 20

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC. Note:

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

] 1 1	TT/SO/LO TT/#0/LO TT/SO/LO TT/#0/LO	6020 6020 6020	1/pm 1/pm 1/pm	0100.0 0100.0 0100.0 0100.0	0.020 0.026 0.036 0.058	Arsenic Arsenic, Dissolved Lead Lead, Dissolved
.110	Date	Method	stinU	Det. Limit	Result	Parameter

L. Larson 06/28/11 12:53

Collected By : Collection Date :

Sample ID MM-S

June 30, 2011 Gulfport Fertillzer Description Date Received :

enjtbort, MS 39501

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue

July 10, 2011

: dl əji2

Project # : 9397.00

ESC Sample # : L523848-13

REPORT OF ANALYSIS

YOUR LAB OF CHOICE

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882#180-S8 .d.I xsT

6585-857 (215) XEE 6585-494-008-1 Mt. Juliet, TW 37122 (615) 758-5858 12065 Lebanon Rd.

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Derection Limit Det. Limit (PQL) Note:

I I I	TT/80/L0 TT/80/L0 TT/80/L0	6020 6020 6020 6020	1/pm 1/pm 1/pm 1/pm	0100.0 0100.0 0100.0	1800.0 108 1100.0	Arsenic Arsenic, Dissolved Lead Lead, Dissolved
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метрод Det. Limit Units Result Рагаметег Dil. Date

> Collected By : Collection Date : P. Parson 06/28/11 13:33

b-MM Sample ID

June 30, 2011 Gulfport Fertillzer Description

Date Received

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

REPORT OF ANALYSIS

July 10, 2011

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Project # : 9397.00

ESC Sample # : L523848-14

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Tax 1.D. 62-0814289

Eax (615) 758-5859 6585-L9L-008-I Mt. Juliet, TN 37122 (615) 758-5858 12065 Lebanon Rd.

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Page 16 of 20

Reported: 07/10/11 11:42 Printed: 07/10/11 11:42

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BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

	T T T	TT/SO/LO TT/\$O/LO TT/SO/LO TT/#O/LO	6020 6020 6020 6020	1/pm 1/pm 1/pm 1/pm	0100.0 0100.0 0100.0	108 108 0.0025 110.0	Arsenic Arsenic, Dissolved Lead Lead, Dissolved
•	DIT.	Date	Method	sjinU	Det. Limit	Result	Рагаметег

D. Larson 06/29/11 09:13

Collected By : Collection Date :

WM-13 Sample ID

Describtion

Date Received :

June 30, 2011 Gulfport Fertillzer

Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501 Mr. Lars Larson

REPORT OF ANALYSIS

0761 .je3

Project # : 9397.00

ESC 29mbje # : F253848-12

site ID :

July 10, 2011

Tax I.D. 62-0814289

Fax (615) 758-5859 ME. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 12065 lebanon Rd. F.V.B. S.C.I.E.N.C.E.S

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

BDL - Below Defection Limit Det. Limit - Practical Quantitation Limit (PQL) Note:

Arsenic Arsenic, Dissolved Lead Lead, Dissolved	0.0020 DIE 0.0014 DIE	0100.0 0100.0 0100.0 0100.0	1/pm 1/pm 1/pm 1/pm	9050 9050 9050 9050	II/\$0/L0 II/\$0/L0 II/\$0/L0 II/b0/L0	T T T
Рагаметег	Result	Det. Limit	Units	Метрод	Date	Dil.

L. Larson 06/29/11 10:08 Collected By : Collection Date :

Sample ID A & I -WM

June 30, 2011 Gulfport Fertillzer Describtion

Date Received :

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

REPORT OF ANALYSIS

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ESC Sample # : L523848-16

Site ID :

July 10, 2011

Tax I.U. 62-0814289

6282-88f (613) xs3 6585-19L-008-I Mt. Juliet, TN 37122 (615) 758-5858

12065 Lebanon Rd.

F-VIB 2-CILE-NICE:8

Page 18 of 20

Reported: 07/10/11 11:42 Printed: 07/10/11 11:43

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

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June 30, 2011 Gulfport Fertillzer Description

Date Received :

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

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ESC Sample # : L523848-17

Project # : 9397.00

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July 10, 2011

Tax I.D. 62-0814289

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

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The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

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WM-II Sample ID

June 30, 2011 Gulfport Fertillzer Description Date Received

Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501 Mr. Lars Larson

REPORT OF ANALYSIS

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Project # : 9397.00

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Eax (615) 758-5859 Mt. Jullet, TN 37122 (615) 758-5858 1-800-767-5859 12065 Lebanon Rd. F.V.B. B.C.I.E.N.C.E.2

Page 12 of 20

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The reported analytical results relate only to the sample submitted.

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Sample ID WM-IS

Description

June 30, 2011 Gulfport Fertillzer Date Received :

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

July 10, 2011

REPORT OF ANALYSIS

0761 .Je3

Project # : 9397.00

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Page 13 of 20

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Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

REPORT OF ANALYSIS

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A sharpher Attachment A List of Analyters

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Qualifier	Run	Analyte	Затр Туре	Group	Sample Number

Attachment B Explanation of QC Qualifier Codes

Meaning

Qualifier

RPD value not applicable for sample concentrations less than 5 times the reporting limit.

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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 established tanges. 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 relevant to sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, such as:

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 Difference.

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.

00:E4:II db II/01/70 Summary of Remarks For Samples Printed

TSR Signing Reports: 034 R5 - Desired TAT

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	2200-A 25th Avenue		2200-A 25th Avenue
	Mr. Lars Larson		
Analysis/Container/Lifeservative Chain of Custody	Billing information:		Covington & Associates

COVINGTON CIVIL & ENVIRONMENTAL, LLC

2200-A 25TH AVENUE GULFPORT, MS 39501

PHONE (228) 396-0486 FAX (228) 396-0487 E-MAIL. LARSLARSON 28@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

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 RECEIVED included as Figure 2.

JAN 7 2011

January 5, 2011 Page 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° 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° 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

January 5, 2011 Page 3

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.

January 5, 2011 Page 4

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.

January 5, 2011 Page 5

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.

January 5, 2011 Page 6

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

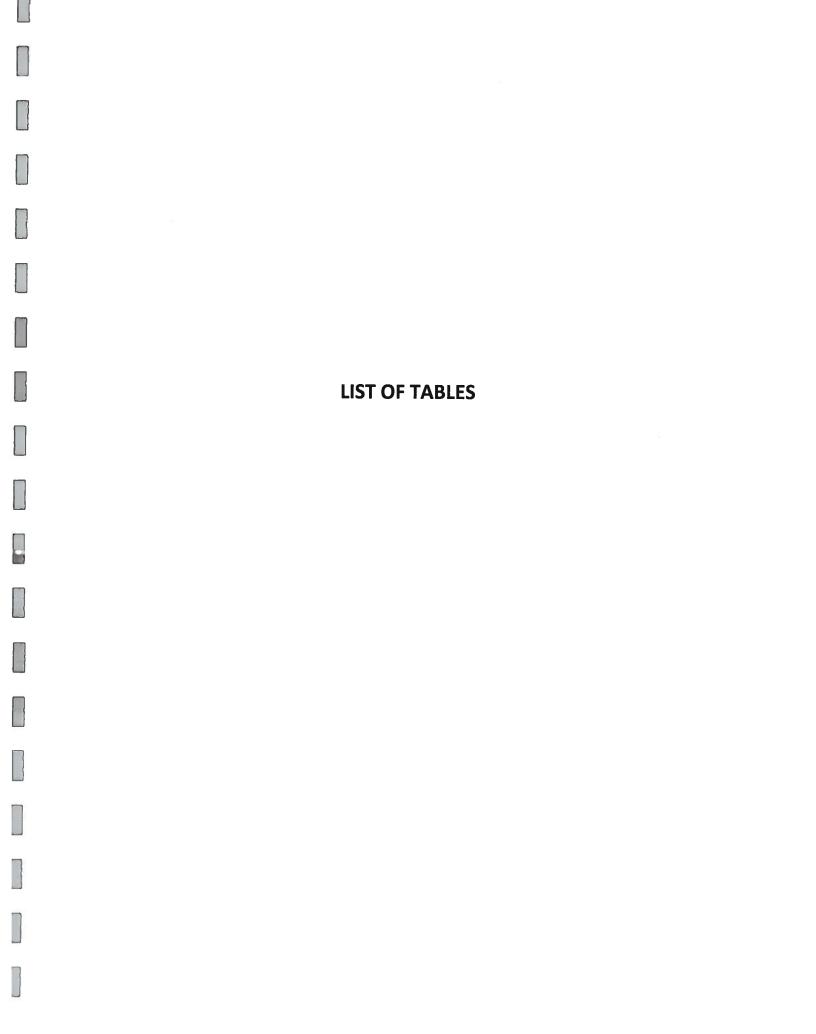
Lars Larson, P.G. Senior Geologist

John F. Szabo, P.E. Managing Principal

ENCLOSURES

CC:

Mr. Tony Russell, OPC - MDEQ Mr. Delma Powell, Hancock Bank



Groundwater Elevations

Historical Groundwater Sampling Events Former Gulfport Fertilizer Site Gulfport, MS

Sampling	I-WM	MW-2	MW-3	MW-4	S-WM	9-MM	MW-7
Date							
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)	6-WM	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	120
12/5-9/2002	0.018	0.052	<0.010	0.048	<0.010	0.030	0.017
3-Duplicate			ĺ	0.050	1	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				100	0,0.0
6/14-15/2010	0.053	0.014	<0.010	0.019	<0.010	0.022	0.011
13-Duplicate	0.053			100		****	
12/1-2/2010	0.021	0.018	0.015	0.0098	<0.0010	0.015	0.0036
14-Duplicate		0.019			5.55.5	3.3.3	0.000
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					i	<0.0010	
6/14-15/2010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
13-Duplicate					Ī	<0.010	
12/1-2/2010	<0.0010	< 0.0010	<0.0010	0.0013	0.0018	<0.0010	<0.0010
14-Duplicate		<0.0010	110		1		
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	ì	ł	0.014	<0.0050	1	1 .0.000
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			1	0.0056	1	<0.0050	0.0000
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	10.0000
11/1/2007	0.066	<0.0050	<0.0050	0.014	<0.0050	<0.0050	<0.0050
10-Duplicate		0.0051			3,5500	10.0000	<0.0050
12/9/2008	0.071	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate					0.0000	40.0000	<0.0050
12/2/2009	0.048	0.0040	0.0012	0.0028	0.0017	0.0055	<0.0030
12-Duplicate		0.0039			0.0011	0.0000	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
6/14-15/2010	0.080	0.0042	<0.0018	<0.0018	<0.0018	<0.0018	<0.0018
13-Duplicate	0.078			3.22.7	.0.0010	10.0010	~0.0016
12/1-2/2010	0.072	0.0034	0.0012	<0.0010	<0.0010	<0.0010	<0.0010
14-Duplicate		0.0036		5.55,5	.0.0010	~0.0010	~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
11/1/2007	<0.0050	<0.0050	0.02	<0.0050	<0.0050	<0.0050	<0.0050
10-Duplicate	<0.0050				0.0000	<0.0050	10.0050
12/9/2008	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
11-Duplicate	Developed to					<0.0050	
12/2/2009	0.12	<0.0010	<0.0010	<0.0010	0.0069	<0.0010	<0.0010
12-Duplicate 6/14-15/2010	<0.0018	0.040	10.0040			<0.0010	
13-Duplicate	~ 0.0018	0.012	<0.0018	0.0081	0.0044	<0.0018	<0.0018
12/1-2/2010	<0.0010	<0.0010	<0.0010	<0.0010	0.0040	<0.0018	
14-Duplicate	-0.0010	<0.0010	\ \0.0010	~0.0010	0.0043	0.0012	<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

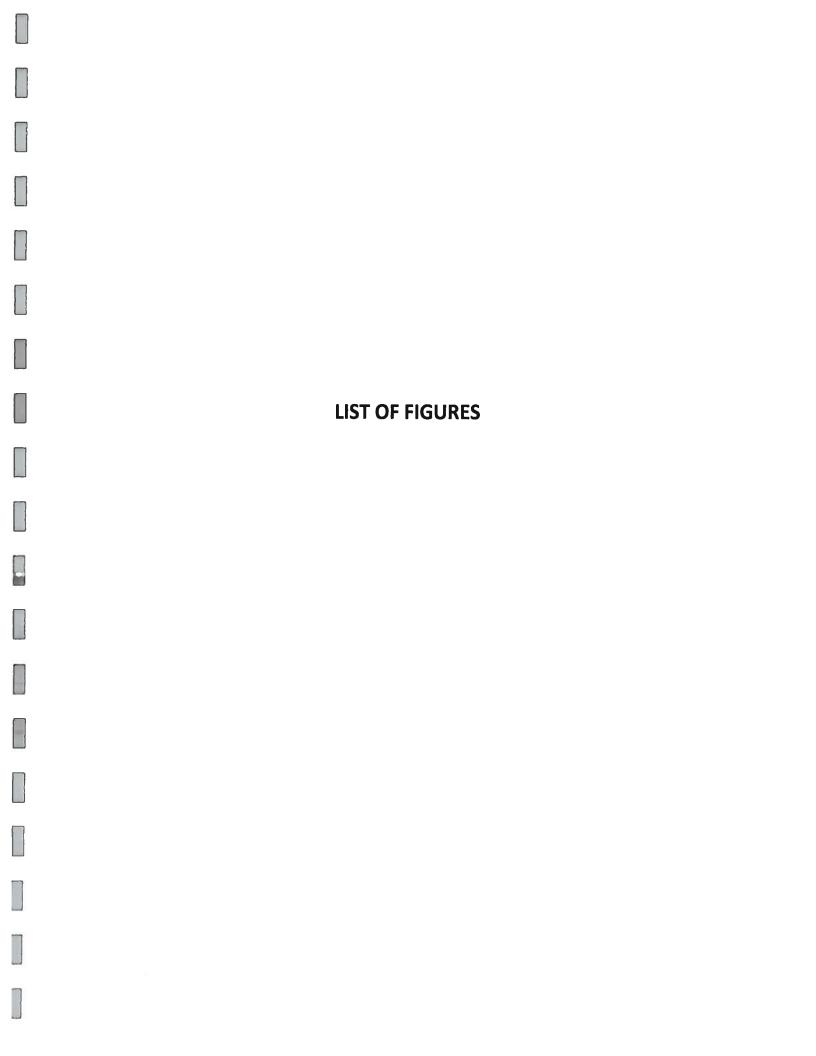
Groundwater Investigation Former Gulfport Fertilizer Site Gulfport, MS

Sampling Date	MW-1	MW-2	MW-3	MW-4	MW-5	9-MW	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	60.9
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)	6-WW	MW-10	11-WW	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.



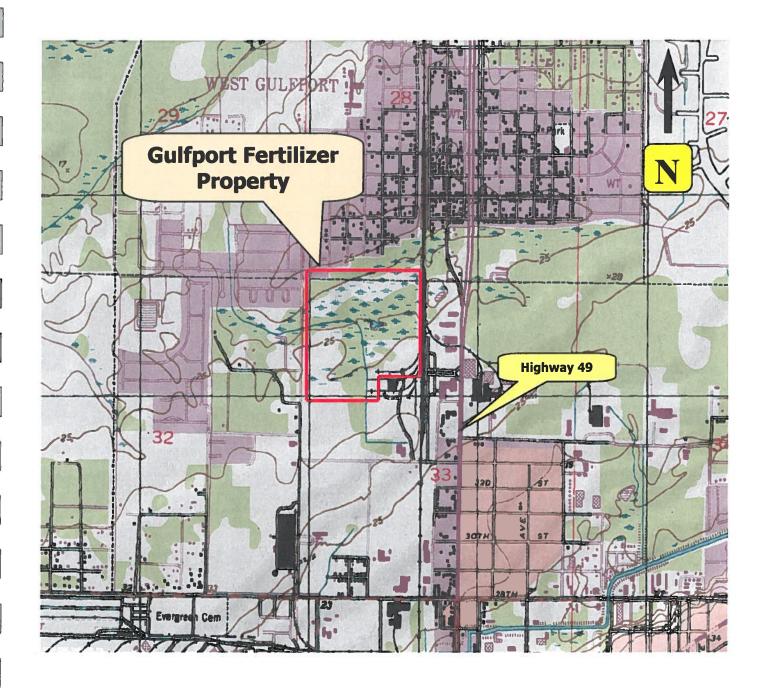
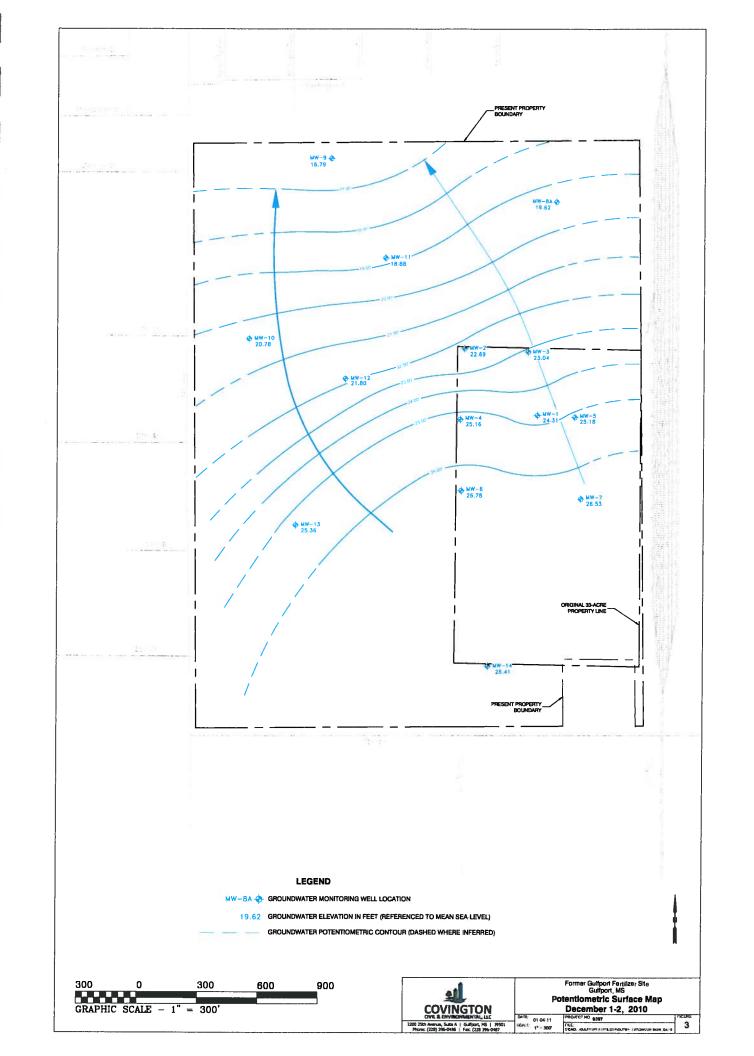
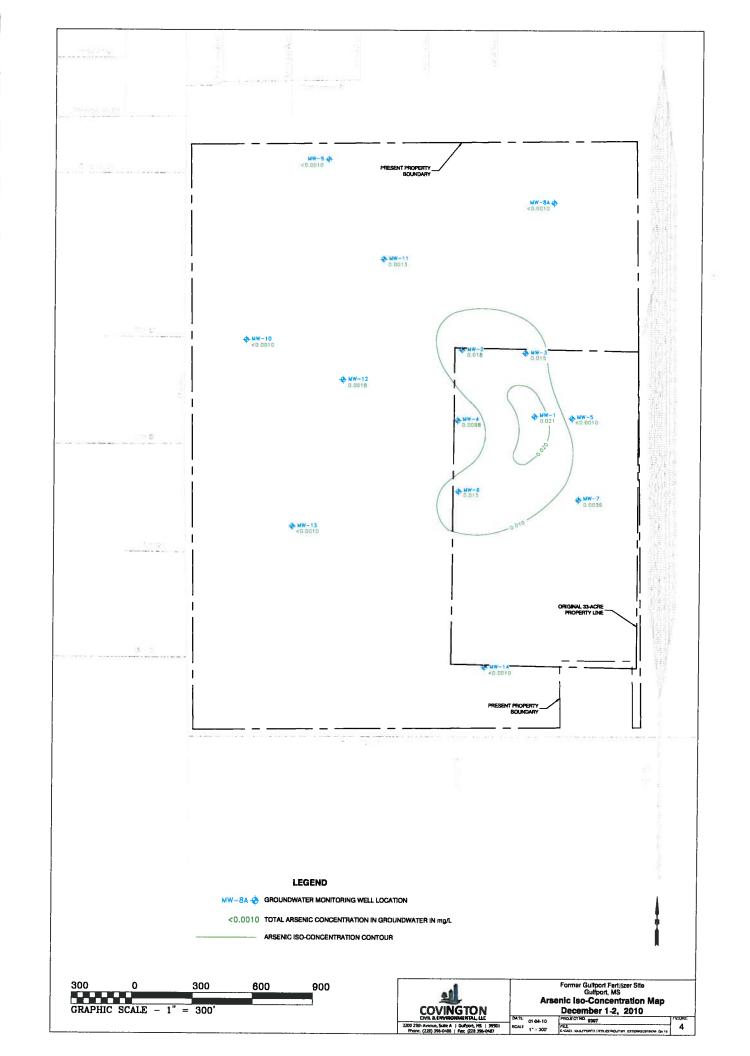
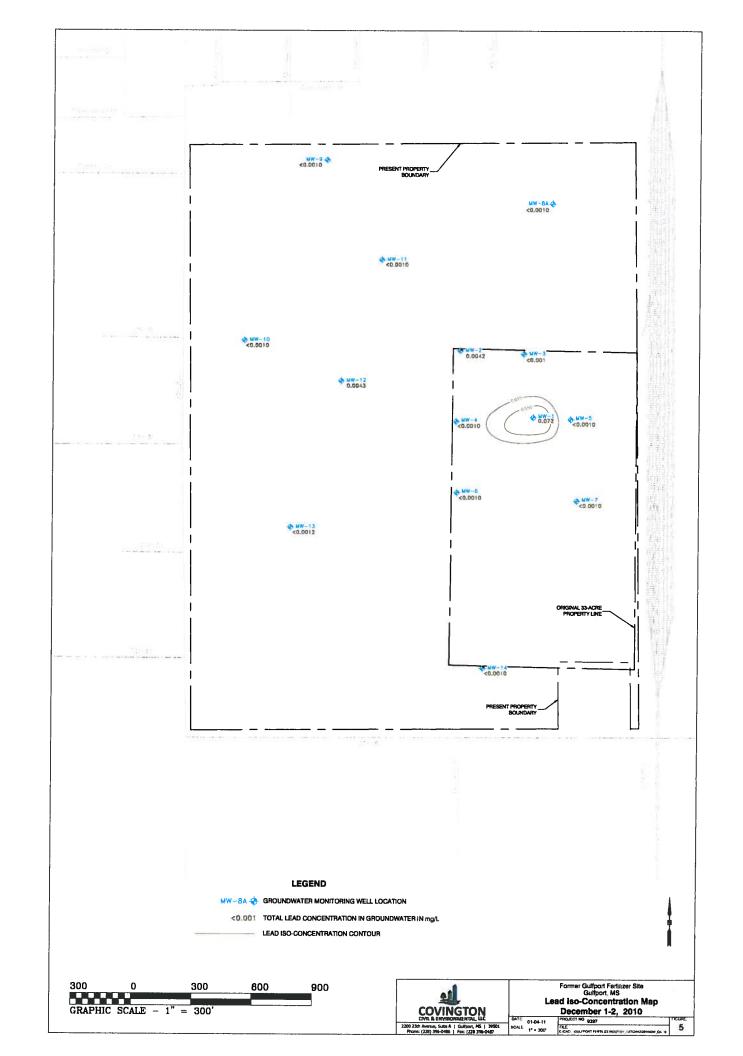


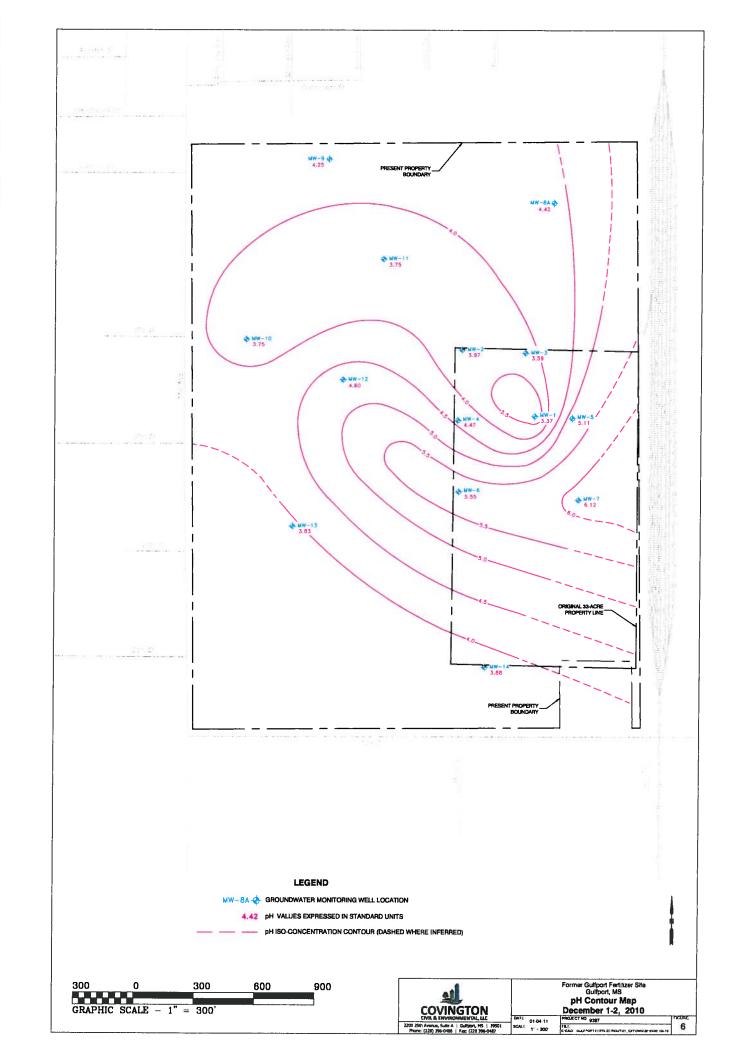
Figure 1 - Site Location Map Gulfport Fertilizer Site U.S.G.S. 7.5-Minute Quadrangle Map Gulfport North, Mississippi 1994 CAC Project # 9397











APPENDIX A

Well Sampling Field Data Sheets

Well Sampling Fleld Data Sheet Covington and Associates Corporation

	of Casing evation [Feet) 22.54	3round Bevation	Gulfport Fertilizer Site Field Equipment	Site	State:	MS	
Meter No. Well Well Diameter (Inches) Ar 2" Distruction: 34" Well 34" Well 34" Callons): 3 (Gallons): be Purged (Gallons): Time	of Casing evation [Feet] 22.54	Ground	Fleid Equipm	And a second second second second	The second secon		
	of Casing evation [Feet] 22.54	Ground		ent Characteristics and the	A TAXABLE DESCRIPTION OF THE PERSON OF THE P	NEWSCORP STATE CHARLES	SAP RESTANCES
	of Casing evation [Feet] 22.54	Ground		Serial No.			
	of Casing evation (Feet) 22.54	Ground		Serial No.			
	of Casing evation 22.54 0.023	Ground		Serlai No.			
	of Casing evation (Feet) 22.54 0.023	Ground	Well information	lon	SCHOOL STATE OF THE PARTY OF TH	STATES OF STATES OF STATES	SERVICE STREET, SERVICE
		(Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation	Water	Water Level Elevation	Water
	MAN AND AND AND AND AND AND AND AND AND A		15.20	5.20	2 42	(4.h.)	(Telet)
							1201
	П	OWafer Coli	Calibration for Well Volume	Calibration for Well Volume			
	П		2" Well	The recti former prince of	Control of the contro	GW 18fe11	A CONTRACTOR OF THE PARTY OF TH
100	2	Well Multiplier:		0.163	Well Mulliniler	I AABII	1.460
		Well Volume = Water Column X Well Multiplier (Gallons):	Column X	がから	Well Volume = Water Column X Well Midliniter (Callons	Ime = Water Column X Well Midliniar (Calone)	BOLL
	S	Well Volumes X 3 (Gallons):	allons):	400	Well Volumes X 3 (Gallons)	Sallone V	
	2	Min. Volume to be Purged (Gallons):	med (Gallons):		Min Volume to be Durned (Callone):	Samuel (Collone)	
a E			Sampling Information	ation		·/eiong) mak	
Purged	Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved Oxygen	Fleid	Oxygen	Field Turbidily
			(mayem)	(mdd)		Potential (mV)	STS.
10.00	2.5	7.0.7	32.4	.43	4150	011	2.5
	3.0	20.2	14.	40	1.48	401	24
60,01	3.5	20.00	16.6	44	2 06	901	4
0.10	1.0	20.3	11 1	135	4.02	107	CS
10:17	ייי	20.00	16.3	34	44	100	7.13
8 0	1,1,0	76.37	6.9	400	4.92	207	4
10:21	10	20 2	18:0	34	4.92	103	-
	,	2					

Well Sampling Field Data Sheet Covington and Associates Corporation

CAC Project Description: Top of Casing Gre Elevation (Feet) (Feet) (Feet) (Feet) (Feet) (Feet) (Feet) (Gallons) (Ga	Equipme Equipme Information (creen to)	Serial No. Serial No. Serial No. Serial No. Bottom of Screen Elevation (Feet) 6.13 0.163	State: Water Level (Feet)	MS	
Top of Casing Gre Elevation (Feet) (F	Field Equipment S Well Information Op of Screen Elevation (Feet) 16.13 16.13 Large Mell V Large	erial No. erial No. erial No. n Bottom of Screen Elevation (Feet) 6.13 6.13	Water Level (Feet)	Section of the second	
Top of Casing Gre Elevation (Feet) (F	Well Information op of Screen Elevation (Feet) 16.13 16.13 2. Well A 2. Well A 2. Well A 2. Well A 2. Well A 2. Well A 3. Well	erial No. erial No. n Bottom of Screen Elevation (Feet) 6.13 6.13	Water Level (Feet)		
Top of Casing Gra Elevation (Feet) (Feet) (Feet) (Feet) (Feet) (Feet) (Feet) (Feet) Duged Volume File (Gallons) (Feet) (Gallons) (Feet) (Gallons) (Feet) (Gallons) (Feet) (Gallons) (Feet) (Gallons) (Feet) (Gallons) (Feet) (Gallons) (Feet) (Gallons) (Feet) (Gallons	Well Information op of Screen Elevation (Feet) 16.13 16.13 Le E-X7481. 2" Well Puttion X 1-23	erial No. n Bottom of Screen Elevation (Feet) 6.13 6.13	Water Level (Feet)		
Top of Casing Gra Elevation Elev 22.64 (Feet) O.023 Well Multi Well Volu Well Volu Min. Volu Min. Volu C. S. S. S. S. S. S. S. S. S. S. S. S. S.	Well Information op of Screen Elevation (Feet) 16.13 16.13 bration for Well V 2" Well But Seet X7.481.3	erial No. Bottom of Screen Elevation (Feet) 6.13 6.13 C.Well Muthiplier)	Water Level (Feet)		
Top of Casing Gra Elevation Elev Elevation Elev Feet) Casing Weil Multi Well Volu Well Wulti Well Volu Well	Well Information op of Screen Elevation Elevation 16.13 16.13 16.13 16.13 16.13 2. Well A Leave Control of the	Bottom of Screen Elevation (Feet) 6.13 6.13 Ciume K.Weil Multiplier)	Water Level (Feet)		
Top of Casing Gra 22.64 Fleet) (Feet) (Feet) 22.64 Well Wull Well Volume Filet (Gallons) Temps (Gallons)	op of Screen Elevation (Feet) 16.13 16.13 bration for Well V 2" Well 8 46 but 6	Bottom of Screen Elevation (Feet) 6.13 6.13 Clume K.Well Muthplier)	Water Level (Feet)	THE STATE OF STREET STREET, ST	STORESTON BUILDING
22.64 0.023 Well Multi Well Volu Well Volu	16.13 16.13 16.13 16.13 16.13 16.13 16.13 16.13 16.13 16.13 16.13	6.13 Olume K.Well Muthpller) 0.163	SixS	Water Level Elevation	Water
0.023 Well Multi Volu Vell Volu Vell Volu Vell Volu Min. Volum Fil (Gallons) Temp 7.00 20.20.20.20.20.20.20.20.20.20.20.20.20.2	bration for Well V	C. Well Multiplier)	1000	11. 7d	(Lessi)
O.023 Well Multi Volume Fig. Well Volume	bration for Well V 2" Well 6 66	K.Well Multiplier)		7177	18.00
O.023 Well Multi Well Volu Well Vo	2" Well	0.163			
Purged Volume = Water C Well Multipiller: Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller Well Multipiller		0.163	SECTION OF SECOND SECOND	En Mail	
Well Volume = Water C Well Multiplier Well Volumes x 3 (Gall Well Volume to be Purg Field Gallons) Temperature (C) Z - S - CO - CO Z - S - CO Z - S - CO Z		3	Well Multiplier		4.460
Well Volumes x 3 (Gallons) Well Volume to be Purged Volume Field		1	Well Volume = Water Column X	er Column X	P.
Min. Volume to be Purged Volume (Gallons) Callons Temperature (Callons) Callons Callons Temperature (Callons Callons Ca		5.5	Well Volumes Y 3 (Callocs):	wen wullplier (Gallons):	
Purged Volume Field	d (Gallons):		Min Volume to be Purmed (Callocate	Jumped (Collone)	
Time Purged Volume Fleid Purged (Gallons) Temperature (Min.) (C) (C) (C) (C) (C) (C) (C) (Sampling Information	lon		riginal Committee	
Min.) Controls (emperature (C) (C) (Min.) (Min.) (C) (C) (C) (Min.	Conductivity	Dissolved	Fleid	Oxygen	Field
16:0 7:0 20:0 15:0 7:0 20:0 15:0 3.0 20:4 16:0 4.0 20:4	(mS/cm)	(ppm)	Ŧ.	Reduction Potential (mV)	Turbidity
15.0 2.5 20.6 15.0 2.5 20.4 15.0 3.5 20.7 16.0 4.0 20.4					(S)
10:0 2.5 20.4 15:0 3.0 20.4 18:0 4.0 20.4 8 23:0 4.5 20.9	21.0	5.48	8.5	20	21.49
15.0 3.0 20.7 19.0 3.5 26.9 8 23.0 4.5 21.1	721	D. F.	3.50	192	0
21.0 4.0 20.9 8 23.0 4.5 21.1	7211	0.80	2.67	140	200
58 23.0 4.5 21.1	124	M	3.29	27	000
2 23.0 4.5 21.1	5,21	0.32	3.99	27	18
2000	153	0.31	4.04	S. A.	
(2.0) 1.8 61-1	12	0.30	4.17	145	2,15
0 2.12 0.65 0.02 10.11	. 7.7	62.0	4.25	132	2.15
Shample 11 ES			1		
			,		

Page 1 of 2

Page 1 of 2

Signature of Field Technician:

iii No. livity Meter No. If	Project Description:	9397		Clty:	Gulfport	
Top Top Top Top Top Top Top Top Top Top		Gulfport Fertilizer Site	Site	State:	¥S	
Top Top Top Top Top Top Top Top Top Top	1	Field Equipment	ent also searces season			The Green States
Top Top Top Top Top Top Top Top Top Top	September 1		Serial No.			
Top Top Top Top Top Top Top Top Top Top	200		Serial No.			
Purgi	2000		Serial No.			
Top Top Purg		Well Information	non	TOTAL CHESIS STREET, S	STATE OF STREET	HEN WINGSTON COLUMN NO.
		Top of Screen Elevation	Botto	Water	Water Level	Water
	-	15.05	(reet)	V. 04	(Feet)	V Feet
				1		12696
	CWater Co	Calibration for Well Volume Water Column, In Feet X 7.481 X Well Multipliers	Volume			
		2" Well		The state of the s	G" Well	AND THE PERSON NAMED IN
			0.163	Well Mulfinlier		1 480
	Well Volume = Water Column X Well Multiplier (Gallons)	ume = Water Column X Well Multiplier (Gallons):	2.3	Well Volume = Water Column X	Ime = Water Column X Well Multinier (Gallons):	200
	Well Volumes X 3 (Gallons):	Gallons):	619	Well Volumes X 3 (Gallons):	Gallons):	
Time Purged (Min.)	Min. Volume to be Purged (Gallons):	urged (Gallons):		Min. Volume to be Purged (Gallons)	Purged (Gallons):	
Time Purged (Min.).		Sampling Information	nation			
(0) (0) (0) (0) (0) (0) (0) (0) (0) (0)	folume Fleid	Conductivity	Dissolved	Fleid	Oxygen	Fleid
2 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8		(mS/cm)	(ppm)	E.	Reduction Potential (mV)	Turbidity
33 8 2						(2)
200	0.0	0.100	6.2	3.16	220	22.2
٨	8-61	860.0	61.0	3,24	202	32.8
11.40	20.0	460.0	61.0	2,45	- XX	24.0
1:43	6	-	1210	3.43	177	2.5
		0.096	6.20	2652	768	12.0
11;48		•	02.0	2.63	たいナ イベン	18:01
	5002	0,096	0.21	36/09	C	2,97
1.50	70.7	0.699	16.0	ーかっ	1 26	190
1.57	20.2	76.0	5.25	3.35	103	. 20
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Well Sampling Field Data Sheet Covington and Associates Corporation Pass Christian, MS

Main Color	2010						
CAC Project Description: Guifport Fertilizer Site			1828/		ĊĮĘ.	Gulfport	
Top of Casing Ground Top of Serial No. Serial No.		escription:	Gulfport Fertilizer	rSite	State:	MS	
Top of Casing Ground Top of Screen Bottom of Screen Elevation Feet)	Control of the second second second	BURNOUS CHEST	Field Equipm	ment	The second second second	MUNICIPAL FOR SALVESTEE	THE PASSESSED IN
Top of Casing Ground Top of Screen Buttom of Screen Elevation Feet)				Serial No.			
Top of Casing Ground Top of Screen Elevation	No.			Serial No.			
Top of Casing Ground Top of Screen Elevation				Sertal No.			
Top of Casing Ground Top of Screen Bottom of Screen Elevation Elevation Elevation Elevation 28.32 20.35 10.35 10.35 28.32 Calibration for Well Volume Walar Column, in Feet X7.481 XWell Multiplier Well Volume = Walar Column X V S	DOUGH AND SHOOL	THE STATE OF	Well Informa	rion I with the second	The Part of the Pa	NT 100 100 100 100 100 100 100 100 100 10	Concentration States
Calibration for Well Volume (Water Column, In Feet X:7.481 X Well Multiplier) Calibration for Well Volume Version of Version o	Top of Elev T	p	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation	Water
Calibration for Well Wolume Calibration for Well Wiltiplier 2" Well Well Multiplier 2" Well Well Multiplier 2" Well Well Well Multiplier (Gallons): Vell Well Multiplier (Gallons): Vell Well Wiltiplier (Gallons): S. 3 S. 3 Sampling Information Sampling Information Sampling Information Conductivity Dissolved Conductivity Dissolved Conductivity Congress			20.95	10.95	717	71.80) × 0/
Calibration for Well Volume Calibration for Well Wiltplier 2" Well Wullplier 2" Well Well Wiltplier 2" Well Well Wiltplier 2" Well Well Wiltplier (Gallons): Vell Wiltplier (Gallons): S. 3 Sampling information Calibration Cal	uction:						1000
0.023 Well Multiplier: 2" Well Well Multiplier: 2" Well Well Valume = Water Column X 1.77			Calibration for We	il Volume	を できる できる できる できる できる できる できる できる できる できる		
0.023 Well Multiplier:	3/4" Well	O JERM)	olumn, in Feet XX.4.4	51 A Well Multiplier)	は単語を見るはできない。	C ^B 16/4H	
Well Volume = Water Column X 1, 2, 7	00	Well Multiplier.	4	G C 0.183	Well Mittinlier	o Augir	1 480
Weil Volume to be Purged (Gallons): Sampling Informed on Sampling Info		Well Volume = Wa	iter Column X olier (Gallons):	227	Well Volume = Water Column X	Ime = Water Column X Well Multinier (Gallons):	801
Min. Volume to be Purged (Gallons): Purged Volume Fleid Conductivity Dissolved	alions):	Well Volumes X 3	(Gallons):	53	Well Volumes X 3 (Gallons):	Sallons):	
Purged Volume Fleid Conductivity Dissolved (Gallons) Temperature (mS/cm) (ppm) 2.45 22.16 5.8 2.5.1 3.0 10.7 6.7 6.7 6.7 4.0 10.7 6.7 6.7 4.0 10.7 6.7 6.7 5.5 10.8 6.8 5.5 10.8 6.8 5.5 10.8 6.8 5.5 10.8 6.8 6.6 6.7 5.7 10.8 6.6 6.7 7.0 10.8 7.0 10.8 8.0 10.6 9.0	urged (Gallons):	Min. Volume to be	Purged (Gallons):		Min. Volume to be F	humed (Gallons)	
Time Purged Volume Fleid Conductivity Dissolved Fleix Purged (Gallons) Temperature (Min.) (ppm) (Min.) (Schions) (ppm) (Min.) (Schions) (ppm) (Min.) (Schions) (Schions) (Schions) (Schions) (Min.) (Schions)	.		Sampling Infor	mation			
25 20.2 2.46 5.8 2.51 413. 26 2.5 20.4 6.7 0.97 4.45 27 20.5 6.7 6.7 0.97 4.45 28 2 20.6 6.7 0.97 4.45 29 10.9 6.9 6.9 6.8 11.5 20 10.9 6.8 6.8 11.5 20 2.5 10.9 6.9 6.9 6.9 6.5 20 2.5 6.8 6.8 6.8 6.8 6.8 6.8 6.8 6.8 6.8 6.8	Time Purged (Gal)	ļ.	Conductivity	Dissolved Oxygen	Heid	Oxygen Reduction	Field Turbidity
25 20.6 5.8 2.51 4.3 35 20.6 6.7 6.4 36 4.0 70.7 6.4 37 20.6 6.7 6.3 38 4.0 7.0.7 6.4 38 4.0 7.0.7 6.4 38 4.0 7.0.7 6.4 38 4.0 7.0.7 6.4 38 4.0 7.0.7 6.3 38 6.8 6.8 6.8 6.8 6.8 6.8 6.8 6.8			(morem)	(mdd)		Potential (mV)	(NIU)
36 3.0 20.7 6.7 0.97 1.97 1.98 1.53 1.53 1.53 1.53 1.53 1.53 1.53 1.53	200 2.5	2/2/2	5.8		4.37	141	302.0
32, 3.5 20.6 (a.7 0.80 4.5) 32, 4.5 20.6 (a.7 0.80 4.5) 32, 4.5 20.7 5.3 6.8 0.91 4.5 32, 5.5 20.8 6.8 0.66 4.6	3,0	20.7	4:9	6.49	4.48	129	٠. ا
128 4.0 2.0.7 6.7 0.90 4.0. 128 4.6 6.9 0.72 4.1 128 6.8 0.72 4.1 129 8.92 5.5 1.5 14.0 8.0 0.72 4.0	2.5	20.6	60.7	0.88	4.57	32/	259.0
1.5 20.4 6.7 0.74 b. 1.5 1.5 6.4 b. 1.5 0.72 c. 1.6	4.0	20.7	6.4	0.80	4.58	114	0.002
1. 44 5.5 20.8 6.8 0.72 4 1. 44 5.5 20.8 6.8 0.66 4	4.5	4.02	4:9		1,54	0 i	しだし
5 20.8 le.8 0.4le 4	8.0	20.8	6.0		4.58	411	24.3
	5.5	8.02	× ,9	_	4.60	7,11	254-5
Signature of Field Technician:	echnician:	77					

Page 1 of 2

Page 1 of 2

Sampler:			Clty:	Gulfport	
Top of Casing Grassing Elevation (Feet) (Fee	Guifport Fertilizer Site	te.	State:	SE	
Top of Casing Greets (Feet) (F	Fleid Equipment	The second second			
Top of Casing Greets (Feet) (F		Serial No.			
Top of Casing Gramation Elevation Elevation Elevation (Feet) (Amelia Multiple Casing Melia Volume (Gallons) Temp (Gallons) (Ga		Serial No.			
Top of Casing Graffeet) (Feet)	Well Information	Serial No.	1	į	
22.36 Well Mult Volume Fi Callons) Temp (Gallons) Temp (Callons) Temp (Sallons) T	Top of Screen Elevation	Bottom of Screen Elevation	Water	Water Level Elevation	Water
0.023 Weil Multi Volu Weil Volu Weil Volu Min. Volu Min. Volu Z. Z. Z. Z. Z. Z. Z. Z. Z. Z. Z. Z. Z.	24.30	14.30	7,80	25.36	11 . 13 la
Well Woll Well Volume Well				н .	
Weil Volume Figure Callons) Purged Volume Figure Gallons) 2.5 2.7 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2	Calibration for Well Volume	/olume			
Purged Volume (Gallons) 3.0 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5	2" Well	V ALGII Weinhitel	THE REST OF THE REST	6" Well	STATE STATE STATE
Purged Volume (Gallons) 3.0 3.0 4.0 5.5 4.5 5.5 5.5 5.5 5.5 5.5 5.5 5.5 5.5		0.163	Well Multiplier:		1.469
Purged Volume (Gallons) 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5	r Column X ir (Gallons):	11.06	Well Volume = Water Column X Well Multiplier (Gallons	ume = Water Column X Well Multiplier (Gallons):	
Purged Volume (Gallons)	allons):	01/0	Well Volumes X 3 (Gallons):	(Gallons):	
Purged Volume (Gallons) 2.5 2.5 4.5 7.7 7.7 7.7 7.7 7.7 7.7	inged (Gallons):	2	Min. Volume to be	Min. Volume to be Purged (Gallons):	
Time Purged Volume Tr (Gallons) O'. OP 2.5 3.0 3.0 4.0 4.0 5.5	Sampling Information	tion			
Purged (Gallons) Table Volume	O and discovering				
20.00 22.2 24.0 24.0 24.0 24.0 24.0 25.3 25.5 25.5 25.5 25.5 25.5 25.5 25.5	Conductivity (mS/cm)	Oxygen Oxygen (ppm)	Hd	Oxygen Reduction Potential (mV)	Turbidity (NTU)
rangery rangery					
www.	10,2	45.0	388	412	19.3
74 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	6.1	4.64	3.96	2/4	21
o kaki	7 . 1	19.4	3.86	122	7.6
May	6.1	A.69	3.84	722	60
, a/	9. (5.56	3.84	212	5.2
	0.0	054	322	223	275
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	9,0	5.0	3.83	727	2.1
	•)		
	†				

1828) 273-95-49

Weli Sampling Fletd Data Sheet Covington and Associates Corporation Pass Christian, MS

Sampling Date: /		CAC Prolont No		7010		-	:	
	No.	משפרו ופופרו וויים		(200		City:	Gulfport	
Sampler: LU	APP >	CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	ES	
AND RESIDENCE	THE CONTRACTOR OF THE PARTY OF	NAME OF TAXABLE PARTY.	District Control of	Field Equipment	nent in season regime	The state of the s	ADDRESS OF THE PROPERTY.	STATE OF STATE
pH Meter No.					Serial No.			
Conductivity Meter No.	r No.				Serial No.			
Turbidity Meter No.	Ġ				Serial No.			
	CAST THE CHART SEE	DESCRIPTION OF THE PERSON	STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET,	Welfinformation	tion		の 日本 日本 日本 日本 日本 日本 日本 日本 日本 日本 日本 日本 日本	
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		18.73	9.73	Janes .	20 78	11 05
Well Casing Construction:	truction:	100	A CONTRACTOR OF THE CONTRACTOR			16.91		
			(Water Co	Calibration for Well Volume	Calibration for Well Volume			
	3/4" Well			2" Well			6" Well	
Well Multiplier.		0.023	Well Multiplier:		0.183	Well Mulliplier		1 460
Well Volume = Water Column X Well Multiplier (Gallons)	lume = Water Column X Well Multiplier (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons):	ume = Water Column X Well Multiplier (Gallons):	11.05	Well Volume = Water Column X Well Multiplier (Gallons	ime = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallons):	Gallons):		Well Volumes X 3 (Gallons):	Gallons):	6 1	Well Volumes X 3 (Gallons):	Sallons):	
Volume to be F	Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	urged (Gallons):	4.7	Min. Volume to be Purged (Gallons):	urged (Gallons):	
Purging Methodology:	ABO			Sampling Information	nation			
Time	1	Purged Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
(Hr:Min)	Purged (MIn.)	(Gallons)	Temperature (°C)	(mS/cm)	Oxygen	Hd	Reduction Patential (m)	Turbidity
	a							
412	é	1						
14.20	20	2.0	20.1	6.0.	8671	3.84	260	762
425	30		20.0	4.0	1, 13	3.78	263	2/-0
4:30	2,5		20.0	6.6	93.0	3.76	265	6.01
4.35	d.0		20.02	6	05.0	37.75	265	0.01
4. 28	4.5		20.02	(0.10	5,73	3,76	21010	7.5
41 40	2.0		20-10	18	0.66	3.75	267	701
4:45			70.07	6, 6	401.0	27.0	7636	1.7
SAMP!	9			3				
+		,						
Signature of Field Technician:	Technician:	W/ (18)	WAL					



Well Sampling Fleid Data Sheet Covington and Associates Corporation

Sampler:	Field/Equipment Field/Equipment Serial No. S	Site ent Serial No.	State:	Me	
Top of Casing Gre Elevation (Feet) (F	Field/Equipms Well Information of Screen Elevation (Feet) 25.83	ent Serial No.		2	
Top of Casing Gre Elevation (Feet) (F	Well Information of Screen Elevation (Feet) 25.83	Serial No.	THE RESIDENCE	STREET, STREET, STREET,	STREET, STREET
Top of Casing Gre Elevation (Feet) (F	Well Information of Screen Elevation (Feet) 25.83 Calibration for Well inference of the second of				
Top of Casing Greet Elevation (Feet)	Well Information of Screen Elevation (Feet) 25.83 Calibration for Well Infered Calibration for Well Infered Calibration for Mell Inf	Serial No.			
Elevation (Feet)	Top of Screen Elevation (Feet) 25.83 Calibration for Well	Serial No.			
34.08 0.023 Well Multi Well Volume Volume Fi (Gallons) C.0 2 C.2 C	25.83 Calibration for Well	Bottom of Screen Elevation	Water	Water Level Elevation	Water
Purged Volume Fi (Gallons) (Gallons) (Sallons) (Sallons) (Sallons) (Sallons) (Sallons) (Sallons)	Calibration for Well	(Feet)	7.707	7/2 d/	(Feet)
Purged Volume Fi (Gallons) C 2	Calibration for Well				
Purged Volume FI (Gallons) Temps (Gallons) Temps (Callons) Tem		Volume			
Purged Volume (Gallons)	2" Well	La crem manphiari	THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAM	6* Well	
Purged Volume (Gallons)		0.163	Well Multiplier		1 480
Purged Volume (Gallons)	er Column X ier (Gallons):	1,72	Weil Volume = Water Column X	me = Water Column X Well Multiplier (Callons)	POR
Purged Volume (Gallons)	Salions):	27	Well Volumes X 3 (Gallons)	(Gallons)	
Purged Volume (Gallons)	urged (Gallons):		Min Volume to be Purped (Gallone)	Purned (Gallone)	
Time Purged Volume (Gallons) (Min.) 2.65 2.65	Sampling information	ation			
(Min.) (M	Conductivity	Dissolved	Field	Oxygen	Fleid
288 0 200 200 200 200 200 200 200 200 20	(mS/cm)	(pom)	E.	Reduction Potential (mV)	Turbidity
245 245 215 215 215 215 215 215 215 215 215 21					
215 25 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	نو	2,13	3.85	279	6
202	(0.1	2.52	13. PT	259	6
2 28 51	11.0	7.27	1000	, Q.C.	4
	65	2.28	48	278	u.
15:18 4.0 21.7	(0.1)	2-20	XX X	276	0
15:21 4.5 27.6	اوا	2.12	8×8×8	276	4.0
5:23,					
Sprigle					

Page 1 of 2

Signature of Field Technician:

Sampler:		CAC TIDECT NO.		9397		City:	Guifport	
DH Meter No. Conductivity Meter I Turbidity Meter No. Well No. MW-4 Mell Casling Constru		CAC Project Description:	ription:	Gulfport Fertilizer Site	Site	State:	MS	
DH Meter No. Conductivity Meter I rurbidity Meter No. Well No. MW-4 Mell Casling Constru	TAX IS BUILDING		CART CONTRACTOR	Field Equipment	rentas di Partia Sabia P	1007(0.644)(0.050)(0.01)	STANDARD CO.	
Conductivity Meter Intrinsity Meter No. Well No. MW-4 Mell Casing Constru					Serial No.			
Well No. Well No. Well Casing Constru	√o.				Serial No.			
Well No. MW-4 Mell Casing Constru					Serial No.			
MW-4 MW-4 Vell Casing Constru	The second second	TATAL SOUNDS SOUTH	TENNET SHOW STRUCK	Well Information	don	A MARKET STORY	TOWNSTAND AS TO LIGHT TO THE	STATE OF PARTY AND PARTY.
MW-4 Vell Casing Constru	Well Diameter (Inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation	Water Level	Water Level Elevation	Water
Vell Casing Constru Vell Mullipiler:	2"	28.28	25.93	20.40	10 40	2 C	(reen)	(Leet)
Vell Multiplier:	ction:					211		37 - 5
Vell Multiplier.			(Water Co	Calibration for Well Volume	Calibration for Well Yolume (Water Column, In Feet X 7 481 X Well M. History)			
Vell Multiplier:	3/4" Well			2" Well	Landaman many Vita	ACTOR SIGNATURE AND STREET	E" MAIN	1 - 10 - 10 - 10 - 10 - 10 - 10 - 10 -
		0.023	Well Multiplier:		0.183	Well Millimilar		1 450
Well Volume = Water Column X Well Multiplier (Gallons):	Column X (Gallons):		Well Volume = Water Column X Well Muliplier (Gallons)	lume = Water Column X Well Muliplier (Galtons):	कित्रा र	Well Volume = Water Column X	Ime = Water Column X Well Multiplier (Gallons)	201
Well Volumes X 3 (Gallons):	llons):		Well Volumes X 3 (Gallons):	Sallons):	カンと	Well Volumes X 3 (Gallons)	(Gallone)	
Min. Volume to be Purged (Gallons):	ged (Gallons):		Min. Volume to be Purged (Gallons):	'urged (Gallons):	٢	Min. Volume to be Purped (Gallons)	Purned (Gallons)	
Purging Methodology:	. 1			Sampling information	nation			
Time (Hr:Min)	Time Purged (Min.)	Purged Volume (Gallons)	Field Temperature (°C)	Conductivity	Dissolved Oxygen	Field	Oxygen Reduction	Field Turbidity
02:4B				(III)	(hpdd)		Ротеппа (ту)	(UTN)
58:57		O'C	h'0C	47.7	.3	77,40	JAN.	1.7
Cd. 60		Jo C	4,0g	4.5	1.34	חתם	13.1	d -
09:63		3,0	po.qt	487	88	61,0	128	10
90.60		3.5	P OC	6'8h	Ž	4.49	レロ	×
09:08		4.0	20.4	.9.ph	L 2.	847	pc!	2
		4.5	7000	19.4	دلا ا	8h'h	20	177
Ci - 60		5.0	20.4	9. D	45,	th'r.	121	1,2
रा ५५०	la li or y or	010						

Page 1 of 2

Sampling Date:	のなん	CAC Project No.		9397		Clty:	Gulfport	
Sampler: CL	/APP	CAC Project Description:	otion:	Gulfport Fertilizer Site	Site	State:	MS	A TOWNSTON OF THE PERSON OF TH
oH Meter No.					Serial No.			
Conductivity Meter No.	No.		!		Serial No.			
Turbidity Meter No.					Sertal No.			
STATE AND STATES		A PRINT CLEAR	Applications of the second	Well Information	On			
Well No.	Well Diameter (Inches)	Top of Casing Efevation (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	30. d	22.69	7 t' 1
Well Casing Construction:	uction:							
	100	20年間里間1000	(Water C	Calibration for Well Volume	Volume		430	
	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 Muttiplier (Gallons):	Column X ir (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons)	lume = Water Column X Well Multiplier (Gallons):	ht'11	Well Volume = Wa Well Mul	me = Water Column X Well Multiplier (Gallons):	
Well Volumes X 3 (Gallans):	allons):		Well Volumes X 3 (Gallons):	Gallons):	161	Well Volumes X 3 (Gallons):	(Gations):	
Min. Volume to be Purged (Gallons):	rrged (Gallons):		Min. Volume to be Purged (Gallons):	Jurged (Gallons):	カセンタ	Min. Volume to be Purged (Gallons):	Purged (Gallons):	
Puroling Methodology:				Sampling information				
Time	Time	Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved Oxygen	PH Hd	Oxygen Reduction	Field Turbidity
(Hr:Min)	(Min.)		(၁)	(mS/cm)	(mdd)		Potential (mV)	(NTU)
G: 20								- 1
-		0.0	40°C	35.3	5h.	3,42	236	25.3
		かく	אי סכ	7	145	3,44	340	8.0
69:36		\$.0	20.4	34.7	ከ ከ '	3,45	ከኩሮ	3,5
N9:39		3.5	20.4	33.8	, 36	3.46	248	2
89: 41		4.0	70 H	33.6	, 5 S	3,47	250	2,8
69.43		とうり	ეი.≲	ት ት	375	3.47	252	£'\
S4:48		2.0	<u>ት </u>	37.3	£T'	£h'{	724	9.1
94: 68	Sample	Collocked	ed					
×	Collect	lan O b	S. Hor	1 # 2 Jan	P. WW.	4		
_		-						

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Well Sampling Field Data Sheet Covington and Associates Corporation

Sampling Date 1,4 1,4 1,4 2,4 2,4 2,4 3,4 4,4					Taba Cili latati, mo	CE			
CAC Project Description: Culforf Settlers Site State: Miss	Sampling Date: (47/10	CAC Project No.		9397		City:	Gulfport	
Top of Casing Ground Fleet Run. Serial No. Seri	Sampler: / / /	470	CAC Project Descri	ption:	Guifport Fertilizer S	te	State:	SES.	
Top of Cashing Ground Top of Sarial No.		13.1	The second secon	Section 1	Fleid Equipme	nt see .	THE STATE OF THE STATE OF	AND THE PERSON	THE PLY LINES
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Top of Casing Ground Top of Casing Ground Top of Casing Ground Top of Casing Ground Top of Casing Ground Top of Casing Ground Top of Casing Ground Top of Casing Tract)	Conductivity Meter	No.				Serial No.			
Top of Cashing Ground Well Information Fleety Freety F	Turbidity Meter No.					Serial No.			
Top of Cashing Ground Top of Screen Beform of Screen Water Level Water Level Elevation	BIRLINGERS TO S	1.62.000 Languages (S.)	TLUBBY S.Y	AND THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.	WellInformatik	L. Company	THE RESIDENCE	STATE STREET, STATE STATE OF THE PARTY OF TH	CONTRACTOR OF SECURITY
30.26 27.46 21.32 11.32 7.2.2 2.3.0.4 11.2 2.3.0.4 11.2 2.3.0.4 11.2 2.3.0.4 11.2 2.3.0.4 11.2 2.3.0.4 11.2 2.3.0.4 11.2 2.3.0.4 11.2 2.3.0.4 11.2 2.3.0.4 2.3.0.4 11.2 2.3.0.4 2.3.	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	Water Level Elevation (Feet)	Water Column (Feet)
Calibration for Weil Volume Weil Multiplier; S* Weil Multipl	MW-3	2	30.26	27.48	21.32	11.32	7.22	. 1	11.72
Wider Column, In Peet X 7.461 x Well Multiplier G" Well Multiplier	Well Casing Constru	uction:					\setminus		
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Well Volume = Water Column X 1	Well Multiplier			Well Multiplier:		0.163	Well Multiplier:		1.469
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Miln. Volume to be Purged (Gallons): Sampling Information Sampling Information Sampling Information Sampling Information Sampling Information Conductivity Dissolved Field Conductivity Congen Philadoxygen Phi	Well Volumes X 3 (G	allons):		Well Valumes X 3 ((Gallons):	16,1	Well Volumes X 3	(Gallons):	
Purged Volume Field Conductivity Dissolved D	Min. Volume to be Pu	rged (Gallons):		Min. Volume to be	Purged (Gallons):	٠,	Min. Volume to be	Purged (Gallons):	
Time Purged Volume Field Conductivity Dissolved Field Conductivity Dissolved Field Conduction	Puraina Methodolog				Sampling Informs	E STORY			
Min, Colored	Time	١		Field	Conductivity	Dissolved	Field	Oxygen	Field
25 25 25 25 25 25 25 25 25 25 25 25 25 2	(Hr:Min)	(Min.)		(C)	(mS/cm)	(mdd)	i	Potential (mV)	(NTU)
3.0 36.5 2.0 2.5 2.5 385 385 380 385 3.5 380 385 3.5 380 385 3.5 380 385 3.5 380 385 3.5 380 3.5 380 3.5 3.5 380 3.5 3.5 3.5 3.5 3.5 3.5 3.5 3.5 3.5 3.5	89:58								
2.5 2.4 1.2 2.5 2.8 2.6 2.6 2.6 2.6 2.6 2.6 2.6 2.6 2.6 2.6	\$0.01		0.6	1:17	25.5	04		288	20.1
3.5 3.1 25.4 3.56 3.76 3.76 3.76 3.76 3.76 3.76 3.76 3.7	10.09		2.5	717	h'SC	50	5,53	ase	5.5
1. 2.5 2.0 2.4. 2.5. 4.0. 2.4. 2.4. 2.4. 2.5. 3.5.0 2.4. 2.4. 2.5.0 2.5.	11501		3.0	21.1	25.4	ነታር ነ	3.56	حالة	2,5
30.0 129 5.50 1.12 2.74 2.74 2.75 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 1.15 2.50 2.50 1.15 2.50 2.50 1.15 2.50 2.50 2.50 2.50 2.50 2.50 2.50 2.5	60:12		ائم	ا./ح	6.92	129	2.5	271	1.7
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Sanded Cellected	10:17		4.5	っる	44.0	36,	2.87	(0	۲-
Sandra Co	10.19		5.0	7116	کیا	36,	3.59	(0	95
Sandos (20)									
	0,19	Sample	ت	2					

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Well Sampling Field Data Sheet CovIngton and Associates Corporation

Campling Oute. 12	6177	CAC Designat No.		0307		- AiG	Gulfbort	
Camping Date.	300	CAC Disject Decorphism.		Culfnort Eartilizar Site	289	State:	No.	
Sampler:		LONG FIGURE LESSEE	C. Sacrific	Field Equipment	ent	Other.	A CONTRACTOR OF THE	the selection of
pH Meter No.					Serial No.			
Conductivity Meter No.	do.				Serial No.			
Turbidity Meter No.					Serial No.			
STATE OF STA	Consideration of the second	STANDARD STANDARD	1.5g/15-AGENESS SAG U.	Well Information	lon	CANCELL CARROLL CONTRACTOR		
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	12,46	7,05
Well Casing Construction:	iction:							
8 225		100) In Contraction	Calibration for Well Volume	Calibration for Well Yolums Water Column in Feet X 7.481 X Well Multiplier			
	3/4" Well			1" Well			4" Well	
Well Mulliplier:		0.023	Well Multiplier:		0.041	Well Multiplier:		0.853
Well Volume = Water Column X	Column X		Well Volume = Water Column X Wall Multiplier (Callons)	Column X		Well Volume ≈ Water Column X Well Muttoller (Gallons	me = Water Column X Well Muttoller (Gallons):	7.05
Well Volumes X 3 (Sallons)	allons).		Well Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons):	(Gallons):	09, 1
Min Volume to be Purped (Gallons):	roed (Gallons):		Min. Volume to be Purped (Gallons):	roed (Gallons):		Min. Volume to be Purged (Gallons)	Purged (Gallons):	13,81
Puming Methodology:			The state of the s	Sampling Information	nation	はははは		The second section is a second
Time	Time	Purged Volume (Gallons)	Field	Conductivity	Dissolved Oxygen	Field	Oxygen Reduction	Field Turbidity
(Hr:MIn)	(Min.)		<u>(</u>	(mS/cm)	(mdd)		Potential (mV)	(NTU)
05:01								
00:11		2,5	21.2	53.8	ム・ブ	334	331	0,0
\S\V.!!		3,0	3.3	P.72	3.64	3,65	341	3.10
10.11		3.5	21.3	59.4	אביג	\$157	348	3,1
01:11		4.0	かって	h' 09	7.64	3,5	754	1,3
11:15		4.5	21.4	62,7	コココ	5,47	358	1.3
51:11		S, O	21,4	63,5	2,05	3,38	364	7
11:17		SiS	アール	65.73	8 ر ز	3,38	365	0,0
11:19		0،۵	71.16	0,149	ن د د	3,38	رم کرد ا	7,0
1-5-31		5.9	21.5	Ľ4.3	07.	337	366	٥, ١
11:33		۵.۲	كزاد	64.4	1,31	3,38	366	1,01
11:25		715	ふって	و دا نه	रंग	3,37	366	0.5
F. G. 1		18.0	いだ	7,70	71.	3,37	363	g
Signature of Field Technician:	echnician:	ノークク)					
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X 11:37 - Souples (elected)

Page 1 of 2

Page 1 of 2

Mater No. er No. Well Diameter (Inches) Z" construction: 34" Well X3 (Gallons): De Purged (Gallons): De Purged (Gallons): De Purged (Gallons): De Purged (Gallons): De Purged (Gallons):	roject Descri		1		CILY.	Guirport	
72	vation Feet) 32.10	i i	Guilport Fertilizer Site	Site	State:	MS	
July 1	of Casing Pvation Feet) 32.10		Field Equipment	ant	がなりた。		Long Control
Dan de la companya de	of Casing evation Feet) 52.10			Serial NO.			
	of Casing evation 7-eet) 32.10			Serial No.			
P	of Casing evation Feet) 32.10	ASSESSED FOR THE PERSON	Weil Information	On the Party of th	A SALISAN SALISAN FILE		
I I I I I I I I I I I I I I I I I I I		Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation (Feet)	Water Level (Feet)	Water Level Elevation (Feat)	Water Column (Feet)
P. C.		29.26	23.19	13.19	7 92	25,18	1.09
<u>a</u>							
a		(Water-Coli	(Water Column, in Feet X 7.481.X Well Multiplier)	Volume 1.X.Weil Muitiplier)			×
			Z" Well			6" Weil	
<u>a</u>	Well	Well Multiplier: Well Volume = Water Column X Well Well Multiplier (Gallons):	Column X rr (Gallons):	0.163 11.99	Well Multiplier: Well Volume = Water Column X Well Well Multiplier (Gallons	ipiler: me = Water Column X Well Multipiler (Gallons):	1.469
8	Well	Well Volumes X 3 (Gallons):	allons):	79.1	Well Volumes X 3 (Gallons):	(Gallons):	
Time Purged (Min.)	Min. V	olume to be Pu	Min. Volume to be Purged (Gallons):		Min. Volume to be Purged (Gallons):	Purged (Gallons):	
Time Purged (Min.)			Sampling Information	4			
(Min.)	ed Volume	Field	Conductivity	Dissolved	Field	Oxygen	Field
ו יו		(C)	(mS/cm)	(mdd)	E	Potential (mV)	(NTU)
11:49	2.0	1.66	35.4	TT.	HAA	303	8.6
1:31	\sqrt{\sq}\}}}\sqrt{\sq}}}}}}\sqrt{\sq}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}	23.0	37.4	19.	506	せると	3,5
11:53		22.1	38'	' કરુ	s.co	291	5.5
11:55		1,60	\ .	th,	2,08	286	6,
17:57		23.1	39.	45	SiOg	280	71
11:59	L.5/	0.c	29.1	141	5,16	275	1,4
10:01	50	33.	29.5	38.	211	012	
13:01 Semoles (blectec	C					
) -						

Well Sampling Field Data Sheet Covington and Associates Corporation

PUTD CAC Project Description: Field Equipment	September Columber Sampling Date:	01/2/10	CAC Project No.		9397		City:	Gulfport		
Serial No. Ser	Top of Casing Ground Serial No. Seri	Sampler: /C	475	CAC Project Descr	iptlon:	Gulfport Fertilizer	Site	State:	MS	
Well Top of Casing Ground Top of Scene Well Top of Casing Ground Top of Scene Well Top of Casing Ground Top of Scene Bottom of Scene Well Well Top of Casing Ground Top of Scene Bottom of Scene Well of Scene Ground Top of Scene Bottom of Scene Teach Ground G	Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Ground Top of Gealing Top of Gealing Ground Top of Gealing Top o		A Table of the Party of the Par		The state of the s	Field Equipm	ent	The second of		The state of the s
Serial No. Weal Information Serial No. Serial No. Weal Information Continue	Top of Cauling Ground Well Information Series Bettom of Screen Water Lavel Water Lavel Cauling Cau	pH Meter No.					Serial No.			
Serial No. Well-Information Serial No. Well-Information Elevation Top of Gening Ground Top of Streen Bottom of Series Water Calum Calum Elevation Elevation Elevation Calum Ca	Top of Craing Well Information Server Water Lavel Colume	Conductivity Mete	r No.				Serial No.			
Well blinchmation Top of Casing Ground Top of Casing Top of Casing Ground Top of Casing Teach Te	Top of Casing Ground Top of Sersen Water Level Water Level Water Level Water Level Water Level Water Column Feed) Feed) Feed	Turbidity Meter No	4				Serial No.			
Column C	Top of Caming Green Top of Serven Water Water Water Water Calum Freety Fr	STATE OF STA		TOTAL PROPERTY.		Well Informat	in the second second			A CALL NO SHIP AND
15.34 15.34 15.34 15.34 1.5 2.6 . 1 3 1 1	S4.29 S1.23 25.34 15.34 71.5 2.6.7 8 11.5 Calibration for Weil/Volume Calibration for Weil/Volume Weil Volume Weil Vol	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	Water
Calibration Calibration	Calibration for Weil Multiplier Calibration for Weil Multiplier Calibration for Weil Multiplier Calibration for Weil Multiplier Calibration for Weil Multiplier Calibras Cali	MW-6	2"	34.29	31.23	25.34	15.34	7.8	٦	מון מון
Webst Column, in Feet X7481. Well Multiplier Carlboration for Webst Column x Carlboration for Well Well Well Well Well Well Well Wel	Continuation for Well Nutriplier Calibration for Well Nutriplier Calibration for Well Nutriplier Calibration for Well Nutriplier Calibration Cal	Well Casing Const	ruction:							
1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	Control Cont				(Water Co	Calibration for Well	Volume		5	
Output O	Outs3 Well Multiplier Outs3 Well Multiplier Outs4 Well Volume = Valer Column X Well Volume = Valer Column X Well Volume = Valer Column X Well Volume Valer Multiplier (Gallons); Valer Well Wultiplier		3/4" Well		College	Z" Well	TATER MINIMED	U KANDAKATI	How wa	
Well Volume = Water Column X Well Volume = Water Column X Well Volume = Water Column X Well Wall Wall Wall Wall Wall Wall Wall	Well Volume = Water Column X	Vell Multiplier:		0.023	Well Multiplier:		0.163	Well Multiplier:		1 469
Well Volume to Purged (Gallons): 1,16 Well Volumes X 3 (Gallons): Min. Volume to be Purged (Gallons): Sampling Information	Well Volumes X3 (Gallons): 1,16 Well Volumes X3 (Gallons): Sampling Information S	Vell Volume = Wat Well Multipli	er Column X ier (Gallons):		Well Volume = Wate Well Multipli	er Column X er (Gallons):	11	Well Volume = W	ster Column X titolier (Gallons):	
Time	Purged Volume to be Purged (Gallons): Sampling Information Sam	Vell Volumes X 3 (C	Salions):		Weil Volumes X 3 (C	Sallons):	28,	Well Volumes X 3	(Gallons):	
Time	Sampling information Purged Volume Field Conductivity Dissolved Field Canductivity Dissolved Field Canduction (ppm) 2	fin. Volume to be P	'urged (Gallons):		Min. Votume to be P	urged (Gallons):	7.59	Min. Volume to he	Pumed (Gallone)	
Time Purged Volume (Gallons) Field Conductivity Dissolved (Gallons) Conductivity Dissolved (Gallons) Field Conductivity Dissolved (Gallons) Field Conductivity (Min.) Dissolved (Gallons) Field Conductivity (Gallons) Dissolved (Gallons)	Purged Volume Fleid Conductivity Dissolved Fleid Conductivity Dissolved Fleid Congen Oxygen urging Methodok	en.			Sampling Inform	ation	1.60.00			
(Min.)	15 22.0 65.9 (S.75 775 78 17 17 17 17 17 17 17 17 17 17 17 17 17	Time		Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved Oxygen	Ped Ha	Oxygen Reduction	Field Turbidity
1	1, 1, 2, 22.0 65.9 5.73 71 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5 2.5	(Hr.mein)	(MID.)		(2)	(mS/cm)	(mdd)		Potential (mV)	(NTU)
25 27.5 42. 66.0 43 5.75 58 1.2 1.2 2.2 1.3 5.75 2.4 1.4 1.5 1.5 1.5 1.5 1.5 1.5 1.5 1.5 1.5 1.5	3.5 3.5 4.5 6.0 6.0.5 5.7 5.8 1.9 3.0.5 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0	12:57		7	22.0	62,9	OS.	573	-	0.1
10 25 35 15 149 145 15 16.0 137 5.75 445 11 25.0 145 15.0	1, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2,	12:39		35	33.0	٥.	44.	2175	25	
1 25 315 45 45 45 45 45 45 45 45 45 45 45 45 45	1.5 3.0 66.0 3.1 5.75 45 1.1 5.7 3.0 5.2 45 1.2 5.7 3.0 5.2 5.7 3.0 5.7 3.0 5.7 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0	17:01		3.0	ንን.ዕ		, 3 7	21.78	49	C: 1
1 05 0-15 0-15 0-15 0-15 0-15 0-15 0-15	4.5 32.0 46.0 34 5.72 3.6 1.1 3.2 3.6 1.2 3.6 2.7 3.2 3.7 3.2 1.2 3.2 3.1 3.2 3.2 3.2 3.2 3.2 3.2 3.2 3.2 3.2 3.2	12:43		3.5	0.55	ووره		SUS	CH	
1.5 2.0 66.0 3.9 5.18 2.7 1.5 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5.0 5	4.5 22.0 66.0 .39 5.78 3.7	17:45		4.0	اند	الوق ن	131	21.S	32	7.7
Serph C. (Letted	5.6 31.0 65.4 138 5.78 3.78 g	F H : C1		4.5	220	66.0	96,	LLIS	42	
Saper Cle	STO - Age	(३:49		5.6	23.0	2,59	35,	218	נל	1700
3	379	,			1					
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	Ignature of Field Technician:									

Page 1 of 2

Sampling Date:	0/2/2	CAC Project No.		9397		Clty:	Guifport	
Sampler:	JENY.	CAC Project Description:	ption:	Gulfport Fertilizer Site	Site	State:	MS	
oH Meter No.			AMAN CONTRACTOR	rieid Equipment	But		(日)	the contract of
Conductivity Motor No.	- N				Serial No.			
Turbidity Meter No					Serial No.			
	STATE OF THE STATE OF	Was with Friends	A DESCRIPTION OF	Well Information	Serial No.	Court State Indian Indian		
Well No.	Well Diameter (inches)	Top of Casing Elevation (Feet)	Ground Elevation (Feet)	Top of Screen Elevation (Feet)	Bottom of Screen Elevation	Water	Water Level Elevation	Water
MW-7	2,	33.48	30.75	24.54	14.64	20.7	T A C	(Feet)
Well Casing Construction:	uction:						50.06	
100	The Real Property of			Calibration for Well Volume	Volume	8 2 T		
	3/4" Well) angar	(water Column, in reet, A.7.461 A.Well Multiplier) 2" Well	A X Well Multiplier)	18 July 18 18 18 18 18 18 18 18 18 18 18 18 18	E" Wall	Section of the sectio
Well Multiplier:		0.023	Well Multiplier:		0.163	Weii Multiplier		1 480
ell Volume = Water Column X Well Multiplier (Gallons):	r Column X sr (Gallons):		Well Volume = Water Column X Well Multiplier (Gallons)	lume ≂ Water Column X Well Muttplier (Gallons):	1.99 1.99	Weil Volume = Water Column X Well Multiplier (Gallons	ime = Water Column X Well Multiplier (Gallons):	BOX.
Well Volumes X 3 (Gallons):	allons):		Well Volumes X 3 (Gallons):	Gallons):	195	Well Volumes X 3 (Gallons)	Gallons)	
Min. Volume to be Purged (Gallons):	irged (Gallons):		Min. Volume to be Purged (Gallons):	Purged (Gallons):	17	Min. Volume to be Purped (Gallons):	Jumped (Callone)	
Purging Methodology:	W		A.D.	Sampling information				
Time	Time Purged	Purged Volume (Gallons)	Field Temperature	Conductivity	Dissolved	Feed	Oxygen	Fleid
(Hr:Min)	(Min.)		(၁၅)	(mS/cm)	(mdd)		Potential (mV)	
15:00								
1		Q Q	21.9	43,7	16.	90.0	39	13,2
13:09		2.5	22.0	43.3	77.	80,0	27	10.5
٠.		3.0	0.55	43.8	591	0119	20	1/3
		35	93.0	ح.ربا	159	6,11	7	7.00
13,15		0,4	ס.ננ	ליכח	155	0119	5	4
15:17		N.Y	0.64	0.67	os.	6.11	43	1,92
15.13		0.5	0,46	0.50	241	काक	43	T
13:30	5		00,00					
	*							
		_						

APPENDIX B

Laboratory Analytical Report Sheets and

Chain-Of-Custody Forms



Tax I.D. 62-0814289

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.

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Tax I.D. 62-0814289

Est. 1970

YOUR LAB OF CHOICE

REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-01

Date Received : December 03, 2010
Description : Gulfport Fertillzer

Site ID :

Description : Gulfport Fertilizer
Sample ID : MW-8

Project #: 9397.00

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. This report shall not be reproduced, except in full, without the written approval from ESC.

Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

Page 2 of 17



Tax I.D. 62-0814289

Est. 1970

YOUR LAB OF CHOICE

REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-02

December 03, 2010 Gulfport Fertillzer Date Received : Description

Site ID :

Sample ID MW-9

Project #: 9397.00

Collected By : L. Larson Collection Date : 12/01/10 11:08

Parameter	Result	Det. Limit	Units	Method	Dat <u>e</u>	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:

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Est. 1970

YOUR LAB OF CHOICE

REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-03

Date Received : Description :

December 03, 2010 Gulfport Fertillzer

Sample ID

MW-11

Collected By : L. Larson Collection Date : 12/01/10 11:57

Project #: 9397.00

Site ID :

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0013	0.0010	mq/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/1	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:
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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-04

Date Received : December 03, 2010 Gulfport Fertillzer

Site ID :

Sample ID MW-12

Project #: 9397.00

Collected By : L. Larson
Collection Date : 12/01/10 12:44

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.0018	0.0010	mq/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:
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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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Sample ID

REPORT OF ANALYSIS

December 22, 2010

Project #: 9397.00

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-05

Date Received December 03, 2010 Gulfport Fertillzer Description

MW-13

Site ID :

L. Larson 12/01/10 13:53 Collected By Collection Date :

Date Dil. Result Det. Limit Units Method Parameter 0.0010 12/20/10 Arsenic BDL mg/l6020 BDL 0.0012 0.030 0.0010 0.0010 0.0010 12/18/10 12/20/10 1 1 1 Arsenic, Dissolved mg/l 6020 mg/l 6020 Lead Lead, Dissolved mg/l 6020 12/18/10

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

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REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-06

December 03, 2010 Gulfport Fertillzer Date Received : Description

Site ID :

Sample ID MW-10

Project #: 9397.00

L. Larson 12/01/10 14:45 Collected By Collection Date :

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mq/l	6020	12/20/10	1
Arsenic, Dissolved	BDL	0.0010	mq/1	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)

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REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-07

Date Received : Description :

December 03, 2010 Gulfport Fertillzer

Site ID :

Sample ID MW-14

Project #: 9397.00

Collected By : Collection Date :

L. Larson 12/01/10 15:23

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	BDL	0.0010	mq/l	6020	12/20/10	1
Arsenic, Dissolved	BDL	0.0010	mq/1	6020	12/18/10	1
Lead	BDL	0.0010	mg/1	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)

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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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Sample ID

REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-08

December 03, 2010 Gulfport Fertillzer Date Received :

Site ID :

Description

Project #: 9397.00

Collected By : L. Larson Collection Date : 12/01/10 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic Arsenic, Dissolved	BDL BDL	0.0010	mg/l mg/l	6020 6020	12/20/10 12/18/10	1
Lead Lead,Dissolved	BDL 0.022	0.0010 0.0010	mg/l mg/l	6020 6020	12/20/10 12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:

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REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-09

Date Received

Description

December 03, 2010 Gulfport Fertillzer

Site ID :

Sample ID

MW-4

Project #: 9397.00

Collected By Collection Date : L. Larson 12/02/10 09:12

Det. Limit Units Method Date Dil. Result Parameter Arsenic 0.0098 0.0010 6020 12/20/10 mg/112/18/10 12/20/10 Arsenic, Dissolved 0.0029 0.0010 mg/l 6020 BDL 0.012 mg/l 6020 Lead 0.0010 1 Lead, Dissolved mg/l 0.0010 6020 12/18/10

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit (PQL)

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REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-10

Date Received :

December 03, 2010 Gulfport Fertillzer

Site ID :

Description

Project #: 9397.00

Sample ID

MW-2

Collected By : Collection Date : L. Larson

12/02/10 09:46

Dil. Result Det. Limit Units Method Date Parameter 1 Arsenic 0.018 0.0010 mg/16020 12/20/10 0.0089 0.0034 0.022 0.0010 0.0010 0.0010 6020 6020 12/18/10 12/20/10 Arsenic, Dissolved mg/l 1 mg/l Lead Lead, Dissolved 6020 12/18/10 mg/l

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit(PQL)

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Sample ID

REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-11

Project #: 9397.00

December 03, 2010 Gulfport Fertillzer Date Received : Description

Site ID :

MW-3

L. Larson 12/02/10 10:19 Collected By Collection Date :

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	0.015 0.0038 0.0012 0.018	0.0010 0.0010 0.0010 0.0010	mg/1 mg/1 mg/1 mg/1	6020 6020 6020 6020	12/20/10 12/18/10 12/20/10 12/18/10	1 1 1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

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YOUR LAB OF CHOICE

REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-12

Date Received :

December 03, 2010 Gulfport Fertillzer

Site ID :

Project #: 9397.00

Sample ID

MW-1

Collected By : L. Larson
Collection Date : 12/02/10 11:27

Parameter	Result	Det. Limit_	Units	Method	Date	Dil.
Arsenic Arsenic,Dissolved Lead Lead,Dissolved	0.021 0.017 0.072 0.074	0.0010 0.0010 0.0010 0.0010	mg/1 mg/1 mg/1 mg/1	6020 6020 6020 6020	12/20/10 12/18/10 12/20/10 12/18/10	1 1 1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)

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REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-13

Date Received : December 03, 2010 Gulfport Fertillzer Description

Site ID :

Sample ID MW-5

Project #: 9397.00

Collected By : L. Larson Collection Date : 12/02/10 12:01

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	BDL BDL BDL 0.0017	0.0010 0.0010 0.0010 0.0010	mg/l mg/l mg/l mg/l	6020 6020 6020 6020	12/20/10 12/18/10 12/20/10 12/18/10	1 1 1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29



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REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-14

December 03, 2010 Gulfport Fertillzer Date Received : Description

Site ID :

Sample ID MW-6

Project # : 9397.00

Collected By : Collection Date : L. Larson 12/02/10 12:49

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	0.015 0.013 BDL BDL	0.0010 0.0010 0.0010 0.0010	mg/l mg/l mg/l mg/l	6020 6020 6020 6020	12/20/10 12/18/10 12/20/10 12/18/10	1 1 1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

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REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-15

Date Received : Description

December 03, 2010 Gulfport Fertillzer

Site ID :

Sample ID

MW-7

Project #: 9397.00

Collected By : L. Larson Collection Date : 12/02/10 13:20

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic Arsenic, Dissolved Lead Lead, Dissolved	0.0036 0.0012 BDL BDL	0.0010 0.0010 0.0010 0.0010	mg/1 mg/1 mg/1 mg/1	6020 6020 6020 6020	12/20/10 12/18/10 12/20/10 12/18/10	1 1 1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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YOUR LAB OF CHOICE

REPORT OF ANALYSIS

December 22, 2010

Mr. Lars Larson Covington & Associates 2200-A 25th Avenue Gulfport, MS 39501

ESC Sample # : L493520-16

Date Received :

December 03, 2010 Gulfport Fertillzer

Site ID :

Description

Project #: 9397.00

Sample ID

DUP-2

Collected By : Collection Date : L. Larson 12/02/10 00:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Arsenic	0.019	0.0010	mg/1	6020	12/20/10	1
Arsenic, Dissolved	0.0085	0.0010	mg/1	6020	12/18/10	1
Lead	0.0036	0.0010	mg/1	6020	12/20/10	1
Lead, Dissolved	0.082	0.0010	mg/1	6020	12/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:
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Reported: 12/22/10 10:28 Printed: 12/22/10 10:29

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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: Relogged from L492019-03	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-04 Account: Relogged from L492019-04	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-05 Account: Relogged from L492019-05	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-06 Account: Relogged from L492019-06	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-07 Account: Relogged from L492019-07	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-08 Account: Relogged from L492019-08	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-09 Account: Relogged from L492019-09	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-10 Account: Relogged from L492019-10	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-11 Account: Relogged from L492019-11	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-12 Account: Relogged from L492019-12	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-13 Account: Relogged from L492019-13	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-14 Account: Relogged from L492019-14	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-15 Account: Relogged from L492019-15	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28
Sample: L493520-16 Account: Relogged from L492019-16	COVASSOC	Received:	12/03/10	09:00	Due	Date:	12/20/10	00:00	RPT	Date:	12/22/10	10:28

Chain of Custody	7 to + 8864	*ESC	L.A.B. S.C.I.E.N.C.E.S 12065 Lebanon Road	Mt. Juliet, TN 37122 Phone: (800) 767-5859	Phone: (615) 758-5838	rat: (015) /34-3659	6493520	Account COVASSOR (lab use only).	Terrolate Preside Tick TRO P 139146	(M) //-//	Subpocition RedEX Ground	Remarks/Contaminant Sample # (lab only)	10 01000		60	60	50	90	£0	20		l cmp	Other		S Condition. (N.C. (Lab use only)	COC Seal Inlact: No KA	Ö
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.	Mr. Lars Larson 2200-A 25th Avenue	S 39501	lars@covingtonessocietes		oject#	COVASSOC-GULFPORT		Date Results Needed			ا ا	Date Time	12/10 1021	1108	1367	19.5	1353	1445	15.63			J.	ۮ	4355 93109040	d by: (Signature)	Received by (Schellur)	d for factory (Signature)
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Covington & Associates	2200-A 25th Avenue	Gulfport,MS 39501	Report to: Mr. Lars Larson	Project Description: Gulfport Fertilizer	Phone. (228) 396-0486		Collected by (print):	Collected by (signature):	mmediately	Packed on Ice N Y	Sample ID	9	2-m	100 m	1-00	100	1	A 1 1.7 - 1 A	1-000			Romarks: XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	\ \ \	Relinquishedoy. (Signados)	Reinguished Market	Reinquished by (E)	

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Covingion & Associates	lates	-						ligi s		ly.		Vio Vio
2200-A 25th Avenue			Mr. Lars Larson 2200-A 25th Avenue	arson th Avenue	ø			A DE		Jr)
Gulfport,MS 39501			Gulfport,MS 39501	S 39501				A STATE OF THE STA	2		97.1 A	TY TY
Report to: Mr. Lars Larson		-	Emait lar	(Acoving	lars@covingtonassoclates net	ton Per	sergol	450				L.A.B.G.I.E.N.G.E.S 12063 Lebanon Road
roject 188cription: Gulfport Fertilizer			City/State Collected				4 34	HAC		Ŧ,	2 10 10	Phone: (800) 767-5859
Mone. (228) 396-0486	Client Project #		Lab Project #	oject #			czep	-3dc		0.0		Phone (615) 738-5858
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