

Vendor No.: 5263

MISSISSIPPI DEPT ENV

Date: 16-NOV-06

Check No.: 25784

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP00002307 40470048	16-OCT-06		0.00	2,025.00

TRONOX

Tronox Worldwide LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

62-20
311

CHECK DATE	CHECK NO.	NET AMOUNT
16-NOV-06	25784	*****2,025.00

VOID AFTER 90 DAYS

PAY Two Thousand Twenty-Five and NO/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325

JACKSON

MS

39289-1325



⑈00025784⑈

⑆031100209⑆

38726253⑈

RECEIVED

NOV 20 2006

MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
ATTENTION: MR. KEITH WATSON
123 S KERR ST
OKLAHOMA CITY, OK 73102

INVOICE #: VEP-00002305

DATE: 10-16-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031

ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 11-15-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
SEPTEMBER 2006 / D. A. RUSSELL	27	STAFF HOUR (S)	75.00	\$2,025.00
			TOTAL AMOUNT DUE	\$2,025.00

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Vendor No.: 5263

MISSISSIPPI DEPT ENV

Date: 02-NOV-06

Check No.: 25652

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP00002265	15-SEP-06 40470048		0.00	712.50

TRONOX

Tronox Worldwide LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citicorp Bank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

CHECK DATE	CHECK NO.	NET AMOUNT
02-NOV-06	25652	\$*****712.50

VOID AFTER 90 DAYS

PAY Seven Hundred Twelve and 50/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY

PO BOX 20325

JACKSON

MS

39289-1325

⑈00025652⑈

⑆031100209⑆

38726253⑈

RECEIVED

NOV - 7 2006

MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
ATTENTION: MR. KEITH WATSON
123 S KERR ST
OKLAHOMA CITY, OK 73102

INVOICE #: VEP-00002265
DATE: 09-15-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 10-15-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
AUGUST 2006 / D. A. RUSSELL	9.5	STAFF HOUR (S)	75.00	\$712.50
TOTAL AMOUNT DUE				\$712.50

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Date: 02-AUG-06

Vendor No.: 5263

MISSISSIPPI DEPT ENV

Check No: 389390

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP0000217	11-JUL-06	CUST# VEP-40470048	0.00	37.50

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

62-20
311

CHECK DATE	CHECK NO	NET AMOUNT
02-AUG-06	389390	\$*****37.50

VOID AFTER 90 DAYS

PAY Thirty-Seven and 50/100 Dollars

TO THE
ORDER
OF

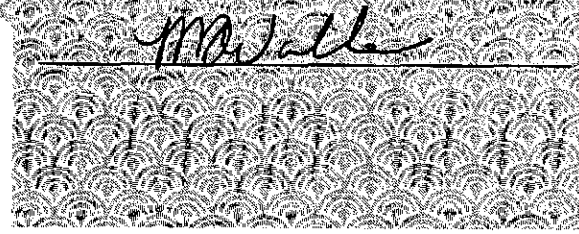
MISSISSIPPI DEPT ENVIRONMENTAL QUALITY

PO BOX 20325

JACKSON

MS

39289-1325



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⑆031100209⑆

38558173⑈

RECEIVED

AUG 07 2006

MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
ATTENTION: MR. KEITH WATSON
123 S KERR ST
OKLAHOMA CITY, OK 73102

INVOICE #: VEP-00002175
DATE: 07-11-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 08-10-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
JUNE 2006 / D. A. RUSSELL	0.5	STAFF HOUR (S)	75.00	\$37.50
TOTAL AMOUNT DUE				\$37.50

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Date: 07-AUG-06

Vendor No.: 5263

MISSISSIPPI DEPT ENV

Check No.: 389693

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP00002137	15-JUN-06	CUST# VEP40470048	0.00	2,612.50

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

07-20
331

CHECK DATE	CHECK NO	NET AMOUNT
07-AUG-06	389693	\$*****2,612.50

VOID AFTER 90 DAYS

PAY Two Thousand Six Hundred Twelve and 50/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY

PO BOX 20325

JACKSON

MS

39289-1325

⑈00389693⑈

⑈031100209⑈

38558173⑈

RECEIVED
AUG 10 2006
MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
ATTENTION: MR. KEITH WATSON
123 S KERR ST
OKLAHOMA CITY, OK 73102

INVOICE #: VEP-00002133
DATE: 06-15-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 07-15-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
MAY 2006 / D. A. RUSSELL	23.5	STAFF HOUR (S)	75.00	\$1,762.50
ANALYZED SVOA SAMPLE #30862	1	SAMPLE (S)	425.00	\$425.00
ANALYZED SVOA SAMPLE #30863	1	SAMPLE (S)	425.00	\$425.00
TOTAL AMOUNT DUE				\$2,612.50

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Vendor No. : 5263

MISSISSIPPI DEPT ENV

Date: 30-MAY-06

Check No.: 383813

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP00002094	17-MAY-06	CUST# VEP-40470048	0.00	487.50

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

62-28
311

CHECK DATE	CHECK NO.	NET AMOUNT
30-MAY-06	383813	\$*****487.50

VOID AFTER 90 DAYS

PAY Four Hundred Eighty-Seven and 50/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY

PO BOX 20325

JACKSON

MS

39289-1325

⑈00383813⑈

⑈031100209⑈

38558173⑈

RECEIVED

JUN - 5 2006

MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM****

ADAMS AND REESE
MR. GLEN PILIE
4500 ONE SHEL SQUARE
NEW ORLEANS, LA 70139

INVOICE #: VEP-00002094
DATE: 05-17-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 06-16-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
APRIL 2006 / D. A. RUSSELL	6.5	STAFF HOUR (S)	75.00	\$487.50
TOTAL AMOUNT DUE				\$487.50

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Vendor No.: 5263

MISSISSIPPI DEPT ENV

Date: 30-MAY-06

Check No.: 383812

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
CEP0000205	13-APR-06	CUST# VEP-40470048	0.00	450.00

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

62-20
311

CHECK DATE	CHECK NO.	NET AMOUNT
30-MAY-06	383812	\$*****450.00

VOID AFTER 90 DAYS

PAY Four Hundred Fifty and NO/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325

JACKSON MS 39289-1325

⑈00383812⑈

⑆031100209⑆

38558173⑈

RECEIVED

JUN - 5 2006

MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE

Vendor No.: 5263

MISSISSIPPI DEPT ENV

Date: 23-MAY-06

Check No.: 383264

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP0000180	22-MAY-06	CUST#VEP-40470048	0.00	37.50
			0.00	37.50

RECEIVED
MAY 30 2006
MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE

Please detach this statement and retain for your records

000153 1547795

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

42-20
311

CHECK DATE	CHECK NO	NET AMOUNT
23-MAY-06	383264	\$*****37.50

VOID AFTER 90 DAYS

PAY Thirty-Seven and 50/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325

JACKSON MS 39289-1325

VEP-1803 40470048 Adams & Reese

⑈00383264⑈

⑈031100209⑈

38558173⑈

Vendor No. : 5263

MISSISSIPPI DEPT ENV

Date: 23-MAY-06

Check No.: 383265

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP0000185	22-MAY-06	CUST#VEP-40470048	0.00	450.00
<p>RECEIVED</p> <p>MAY 30 2006</p> <p>MS DEPT. OF ENVIRONMENTAL QUALITY ACCOUNTS RECEIVABLE</p>				
			0.00	450.00

Please detach this statement and retain for your records

000154 1547796

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

42-28
311

CHECK DATE	CHECK NO.	NET AMOUNT
23-MAY-06	383265	\$*****450.00

VOID AFTER 90 DAYS

PAY Four Hundred Fifty and NO/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325

JACKSON MS 39289-1325

VEP-1850 40470048 Adams & Reese

⑈00383265⑈

⑆031100209⑆

38558173⑈



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
MR. GLEN PILIE
4500 ONE SHEL SQUARE
NEW ORLEANS, LA 70139

INVOICE #: VEP-00002056
DATE: 04-13-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 05-13-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
MARCH 2006 / D. A. RUSSELL	6	STAFF HOUR (S)	75.00	\$450.00
TOTAL AMOUNT DUE				\$450.00

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Vendor No. :

5263 QL

MISSISSIPPI DEPT ENV

Date: 20-APR-06

check No.: 380457

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP00002019 *QL 2019 40470048	18-APR-06	HATTIESBURG RUSH CALL - MICHELLE WHISENHUNT @ EXT 2732	0.00	825.00

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

62-20
311

CHECK DATE	CHECK NO.	NET AMOUNT
20-APR-06	380457	\$*****825.00

VOID AFTER 90 DAYS

PAY Eight Hundred Twenty-Five and NO/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325

JACKSON MS 39289-1325

⑈00380457⑈

⑈031100209⑈

38558173⑈

RECEIVED

APR 28 2006

MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
MR. GLEN PILIE
4500 ONE SHEL SQUARE
NEW ORLEANS, LA 70139

INVOICE #: VEP-00002019
DATE: 03-15-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 04-14-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
FEBRUARY 2006 / D. A. RUSSELL	11	STAFF HOUR (S)	75.00	\$825.00
TOTAL AMOUNT DUE				\$825.00

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Vendor No.: 5263

MISSISSIPPI DEPT ENV

Date: 23-MAY-06

Check No.: 383268

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP0000197	22-MAY-06	CUST#VEP-40470048	0.00	150.00
<p>RECEIVED MAY 30 2006 MS DEPT. OF ENVIRONMENTAL QUALITY ACCOUNTS RECEIVABLE</p>			0.00	150.00

Please detach this statement and retain for your records

000157 1547799

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

12-20
311

CHECK DATE	CHECK NO.	NET AMOUNT
23-MAY-06	383268	\$*****150.00

VOID AFTER 90 DAYS

PAY One Hundred Fifty and NO/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325

JACKSON MS 39289-1325

VEP-1974 40470048 Adams & Reese

⑈00383268⑈

⑆031100209⑆

38558173⑈



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
MR. GLEN PILIE
4500 ONE SHEL SQUARE
NEW ORLEANS, LA 70139

INVOICE #: VEP-00001974
DATE: 02-15-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 03-17-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
JANUARY 2006 / D. A. RUSSELL	2	STAFF HOUR (S)	75.00	\$150.00
			TOTAL AMOUNT DUE	\$150.00

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Vendor No. : 5263

MISSISSIPPI DEPT ENV

Date: 23-MAY-06

Check No.: 383267

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP0000193	22-MAY-06	CUST#VEP-40470048	0.00	3,900.00
<p>RECEIVED MAY 30 2006 MS DEPT. OF ENVIRONMENTAL QUALITY ACCOUNTS RECEIVABLE</p>			0.00	3,900.00

Please detach this statement and retain for your records

000156 1547798

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

62-20
311

CHECK DATE	CHECK NO.	NET AMOUNT
23-MAY-06	383267	\$*****3,900.00

VOID AFTER 90 DAYS

PAY Three Thousand Nine Hundred and NO/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325

JACKSON MS 39289-1325

VEP-1931 40470048 Adams & Reese

⑈00383267⑈

⑈031100209⑈

38558173⑈



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****
**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
MR. GLEN PILIE
4500 ONE SHEL SQUARE
NEW ORLEANS, LA 70139

INVOICE #: VEP-00001931
DATE: 01-12-2006

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 02-11-06

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
DECEMBER 2005 / D. A. RUSSELL	22	STAFF HOUR (S)	75.00	\$1,650.00
ANALYZED VOA SAMPLE #30011	1	SAMPLE (S)	225.00	\$225.00
ANALYZED VOA SAMPLE #30012	1	SAMPLE (S)	225.00	\$225.00
ANALYZED SVOC SAMPLE #30011	1	SAMPLE (S)	450.00	\$450.00
ANALYZED SVOC SAMPLE #30012	1	SAMPLE (S)	450.00	\$450.00
ANALYZED SVOC SAMPLE #30013	1	SAMPLE (S)	450.00	\$450.00
ANALYZED SVOC SAMPLE #30014	1	SAMPLE (S)	450.00	\$450.00
TOTAL AMOUNT DUE				\$3,900.00

ACCOUNTS RECEIVABLE/FEES

POST OFFICE BOX 20325 • JACKSON, MISSISSIPPI 39289-1325 • TEL: (601) 961-5572 • FAX: (601) 354-6965 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Vendor No. : 5263

MISSISSIPPI DEPT ENV

Date: 23-MAY-06

Check No.: 383266

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
VEP0000189	22-MAY-06	CUST#VEP-40470048	0.00	525.00
<p>RECEIVED MAY 30 2006 MS DEPT. OF ENVIRONMENTAL QUALITY ACCOUNTS RECEIVABLE</p>			0.00	525.00

Please detach this statement and retain for your records

000165 1547797

TRONOX

Tronox LLC
123 Robert S. Kerr
Oklahoma City, OK 73102

Citibank, Delaware
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

52-28
311

CHECK DATE	CHECK NO.	NET AMOUNT
23-MAY-06	383266	\$*****525.00

VOID AFTER 90 DAYS

PAY Five Hundred Twenty-Five and NO/100 Dollars

TO THE
ORDER
OF

MISSISSIPPI DEPT ENVIRONMENTAL QUALITY
PO BOX 20325

JACKSON MS 39289-1325

VEP-1891

40470048

Adams & Reese

00383266

031100209

38558173



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

**** INVOICE ****

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM ****

ADAMS AND REESE
MR. GLEN PILIE
4500 ONE SHEL SQUARE
NEW ORLEANS, LA 70139

INVOICE #: VEP-00001891

DATE: 12-14-2005

FINANCIAL:

AVELEKA MOORE - (601) 961-5031

ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470048

Date Due: 01-13-06

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
NOVEMBER 2005 / D. A. RUSSELL	7	STAFF HOUR (S)	75.00	\$525.00
TOTAL AMOUNT DUE				\$525.00

ACCOUNTS RECEIVABLE/FEES



MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

CHAIN OF CUSTODY RECORD

POLLUTION CONTROL
LABORATORY
121 Fairmont Plaza
Pearl, Mississippi 39208

PROJECT NAME <i>Gulf Stetes Creosote</i>		SHIPPED TO:	
LOCATION <i>Hattiesburg, Ms.</i>		DATA TO: <i>Tony Russell</i>	
SAMPLE TYPES 1. SURFACE WATER 2. GROUND WATER 3. POTABLE WATER 4. WASTEWATER 5. LEACHATE 11. OTHER		CIRCLE/ADD parameter desired. List no. of containers submitted.	
SAMPLERS (SIGN) A. <i>Brad Black</i> B. C. D.		ANALYSIS PURE AROMATICS EXT. ORGANICS (TOX) (TL) METALS (TOX) (TL) BOD SOLIDS COD TOX NUTRIENTS	
STATION LOCATION/DESCRIPTION <i>Monitor Well 19</i>		REMARKS <i>odor</i>	
SITE NO. <i>MW-19</i>	DATE <i>1/10</i>	TIME <i>1330</i>	LAB USE ONLY <i>32394</i>
DATE/TIME <i>1/10 1205</i>		DATE/TIME <i>1/10 1515</i>	
RELINQUISHED BY: (PRINT) <i>Tony Russell</i>	RECEIVED BY: (PRINT) <i>Kayra Johnson</i>	RELINQUISHED BY: (SIGN) <i>Kayra Johnson</i>	RECEIVED BY: (PRINT) <i>Kimberly Sawyer</i>
RELINQUISHED BY: (SIGN) <i>Tony Russell</i>	RECEIVED BY: (SIGN) <i>Kayra Johnson</i>	RELINQUISHED BY: (PRINT) <i>Tony Russell</i>	RECEIVED BY: (SIGN) <i>Kayra Johnson</i>
RELINQUISHED BY: (PRINT) <i>Tony Russell</i>	RECEIVED BY: (PRINT) <i>Kayra Johnson</i>	RELINQUISHED BY: (SIGN) <i>Tony Russell</i>	RECEIVED BY: (PRINT) <i>Kimberly Sawyer</i>
RELINQUISHED BY: (SIGN) <i>Tony Russell</i>	RECEIVED BY: (SIGN) <i>Kayra Johnson</i>	RELINQUISHED BY: (PRINT) <i>Tony Russell</i>	RECEIVED BY: (SIGN) <i>Kayra Johnson</i>

Temp. 2.0°C IS

NOTICE: Must use a separate form for each ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

#3047



MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

CHAIN OF CUSTODY RECORD

POLLUTION CONTROL
LABORATORY
121 Fairmont Plaza
Pearl, Mississippi 39208

PROJECT NAME <i>Gulf States Creosote</i>					SHIPPED TO:					LAB USE ONLY																					
LOCATION <i>Hattiesburg, Ms.</i>					DATA TO: <i>Tony Russell</i>																										
SAMPLE TYPES		SAMPLES (SIGN)			<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th rowspan="2" style="writing-mode: vertical-rl; transform: rotate(180deg);">TOTAL CONTAINERS</th> <th colspan="10">ANALYSIS</th> </tr> <tr> <td style="text-align: center;">CIRCLE/ADD parameter desired. List no. of con- tainers submit- ted.</td> <td style="text-align: center;">COD, TOC, NUTRIENTS</td> <td style="text-align: center;">BOD, SOLIDS</td> <td style="text-align: center;">METALS (Total) (TCLP)</td> <td style="text-align: center;">EXT. ORG/PEST/PCBs (TCLP)</td> <td style="text-align: center;">PURE AROMATICS/ HALOCARBONS</td> <td style="text-align: center;">CYANIDE</td> <td style="text-align: center;">FECAL COLIFORM</td> <td style="text-align: center;">Oil & Grease/TPH</td> <td style="text-align: center;">Phenolics</td> <td style="text-align: center;">PAHs</td> </tr> </table>						TOTAL CONTAINERS	ANALYSIS										CIRCLE/ADD parameter desired. List no. of con- tainers submit- ted.	COD, TOC, NUTRIENTS	BOD, SOLIDS	METALS (Total) (TCLP)	EXT. ORG/PEST/PCBs (TCLP)	PURE AROMATICS/ HALOCARBONS	CYANIDE	FECAL COLIFORM	Oil & Grease/TPH	Phenolics
TOTAL CONTAINERS	ANALYSIS																														
	CIRCLE/ADD parameter desired. List no. of con- tainers submit- ted.	COD, TOC, NUTRIENTS	BOD, SOLIDS	METALS (Total) (TCLP)	EXT. ORG/PEST/PCBs (TCLP)	PURE AROMATICS/ HALOCARBONS	CYANIDE	FECAL COLIFORM	Oil & Grease/TPH	Phenolics	PAHs																				
1. SURFACE WATER 6. SOIL/SEDIMENT 2. GROUND WATER 7. SLUDGE 3. POTABLE WATER 8. WASTE 4. WASTEWATER 9. AIR 5. LEACHATE 10. FISH 11. OTHER		A. <i>Real Blank</i> B. _____ C. _____ D. _____																													
SITE NO.	SAMPLE TYPE	DATE	TIME	COMP	GRAB	STATION LOCATION/DESCRIPTION	TOTAL CONTAINERS	COD, TOC, NUTRIENTS	BOD, SOLIDS	METALS (Total) (TCLP)	EXT. ORG/PEST/PCBs (TCLP)	PURE AROMATICS/ HALOCARBONS	CYANIDE	FECAL COLIFORM	Oil & Grease/TPH	Phenolics	PAHs	REMARKS	LAB USE ONLY												
<i>11A-196</i>		<i>1/10</i>	<i>13:30</i>			<i>Monitor Well 19</i>	<i>2</i>											<i>odor</i>	<i>32314</i>												
						<i>Temp. 2.0°C B</i>																									
RELINQUISHED BY: (PRINT) <i>Tony Russell</i>		DATE/TIME <i>1/10/05</i>		RECEIVED BY: (PRINT) <i>Kayla Johnson</i>		RELINQUISHED BY: (PRINT) _____		DATE/TIME <i>1/10/05</i>		RECEIVED BY: (PRINT) <i>Kim Sawyer</i>		RELINQUISHED BY: (PRINT) _____		DATE/TIME _____		RECEIVED BY: (PRINT) _____															
(SIGN) <i>Tony Russell</i>				(SIGN) <i>Kayla Johnson</i>		(SIGN) _____				(SIGN) _____		(SIGN) _____				(SIGN) _____															
RELINQUISHED BY: (PRINT) _____		DATE/TIME _____		RECEIVED BY: (PRINT) _____		RELINQUISHED BY: (PRINT) _____		DATE/TIME _____		RECEIVED BY: (PRINT) _____		RELINQUISHED BY: (PRINT) _____		DATE/TIME _____		RECEIVED BY: (PRINT) _____															
(SIGN) _____				(SIGN) _____		(SIGN) _____				(SIGN) _____		(SIGN) _____				(SIGN) _____															

NOTICE: Must use a separate form for each ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

#3047

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Chemical
 County Code _____ NPDES Permit No. _____
 Discharge No. _____ Date Requested _____
 Sample Point Identification 111419
 Requested By _____ Data To 5/21/87
 Type of Sample: Grab (X) Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION:
 Environment Condition _____ Collected By B. Blalock
 Where Taken 111419

Type	Parameters	Preservative	Date	Time
1. <u>Water</u>	<u>FHA</u>	<u>Jice</u>	<u>5/21/87</u>	<u>1330</u>
2.				
3.				
4.				
5.				

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other () SPC Vehicle, etc
 V. LABORATORY: Received By _____ Date 5/21/87 Time 1:15
 Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l		*
COD ₅	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			

Remarks Analysis

*Date of Test Initiation # 3047

228H

Sample Receipt

Mississippi DEQ/OPC Laboratory

Sample I.D. AA32394
Location code C0350014
Location Description GULF STATES CREOSOTE
Sample collector BBLLOCK
Collection date: 01/10/2007
Lab submittal date: 01/11/2007
Due date: 01/11/2007
Matrix: GROUNDWATER

Login record file: 070111152222

Collection time: 13:30
Lab submittal time: 15:15

Division Code: 3047

STUDY _____
PERMIT_NO _____
DISCHARGE_NO _____
WADES_NO _____
OTHER_NO MW-19
SAMPLE_LOCATION MW19
COUNTY_CODE _____
REQUESTED_BY TONY RUSSELL

<u>Analyses ordered</u>	<u>Method</u>	<u>Due Date</u>
POLYNUCLEAR AROMATIC HYDROCARBONS (PAH)	625	02/26/2007
POLYNUCLEAR AROMATIC HYDROCARBONS (PAH)	625	02/26/2007

Please refer to the indicated sample I.D. number when making inquiries.

Received by: _____

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

COMPLIANCE MONITORING REPORT

To: TONY RUSSELL	
Sample ID: AA32394 Facility Name: GULF STATES CREOSOTE Sampling Loc: MW19 Site ID: C0350014 Discharge No: Other No: MW-19 Permit No: Latitude: Longitude: County: 035 FORREST	QA Type: Date Collected: 01/10/2007 Time Collected: 13:30 Sample Collector: BBLALOCK To Lab: SV Sample Type: GROUNDWATER Date Received: 01/11/2007 Time Received: 1515 Received By: TAMMY SAWYER Project: 3047 Study: COMPLIANCE

ANALYTE	METHOD	RESULT	UNIT	MQL	ANALYST
2-Methylnaphthalene	625	14.6	µg/L	10	JSHELL
Acenaphthene	625	41.5	µg/L	10	JSHELL
Acenaphthylene	625	Trace (1.77)	µg/L	10	JSHELL
Anthracene	625	Trace (1.40)	µg/L	10	JSHELL
Benao(a)pyrene	625	<MQL	µg/L	10	JSHELL
Benzo(a)anthracene	625	<MQL	µg/L	10	JSHELL
Benzo(b)fluoranthene	625	<MQL	µg/L	10	JSHELL
Benzo(g,h,i)perylene	625	<MQL	µg/L	20	JSHELL
Benzo(k)fluoranthene	625	<MQL	µg/L	10	JSHELL
Chrysene	625	<MQL	µg/L	10	JSHELL
Dibenz(a,h)anthracene	625	<MQL	µg/L	20	JSHELL
Fluoranthene	625	Trace (1.19)	µg/L	10	JSHELL
Fluorene	625	19.0	µg/L	10	JSHELL

Indeno(1,2,3,cd)pyrene	625	<MQL	µg/l	20	JSHELL
Naphthalene	625	159	µg/L	10	JSHELL
Phenanthrene	625	17.3	µg/L	10	JSHELL
Pyrene	625	<MQL	µg/L	10	JSHELL
2-Flurobiphenyl	625	82%	%	20-135	JSHELL
Nitrobenzene-d5	625	72%	%	17-134	JSHELL
p-Terphenyl-d14	625	102%	%	25-140	JSHELL

ABBREVIATIONS / DEFINITIONS

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg:
milligrams/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MQL: Maximum Quantifiable Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than

COC Date: Date Chain of Custody Signed
COC Time: Time Chain of Custody Signed

SAMPLE COMMENTS:

REMARKS: LOW LEVEL ANALYSIS AND HAS ODOR
COLLECTOR: BRAD BLALOCK- FIELD CONSULTANT

Validation Date: 02/16/2007

Validated By: 

Print Date: 02/16/2007

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Creosote
 County Code Forrest NPDES Permit No. _____
 Discharge No. _____ Date Requested _____
 Sample Point Identification MW 19
 Requested By T Russell Data To T Russell
 Type of Sample: Grab () Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION:
 Environment Condition _____ Collected By B Blalock
 Where Taken Man: log well M

	Type	Parameters	Preservative	Date	Time
1.	<u>Groundwater</u>	<u>PAHs</u>	<u>Ice</u>	<u>1/10/07</u>	<u>1330</u>
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()	_____	_____	_____
D.O.	(000300)	()	_____	_____	_____
Temperature	(000010)	()	_____	_____	_____
Residual Chlorine	(050060)	()	_____	_____	_____
Flow	(074060)	()	_____	_____	_____

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other (opc vehicle)
 V. LABORATORY: Received By Darryl Davis Date 1/11/07 Time 1515
 Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l	_____	*
COD ₅	(000340)	()	mg/l	_____	_____
TOC	(000680)	()	mg/l	_____	_____
Suspended Solids	(099000)	()	mg/l	_____	_____
TKN	(000625)	()	mg/l	_____	_____
Ammonia-N	(000610)	()	mg/l	_____	_____
Fecal Coliform(1)	(074055)	()	colonies/100 ml	_____	*
Fecal Coliform(2)	(074055)	()	colonies/100 ml	_____	*
Total Phosphorus	(000665)	()	mg/l	_____	_____
Oil and Grease(1)	(000550)	()	mg/l	_____	_____
Oil and Grease(2)	(000550)	()	mg/l	_____	_____
Chlorides	(099016)	()	mg/l	_____	_____
Phenol	(032730)	()	mg/l	_____	_____
Total Chromium	(001034)	()	mg/l	_____	_____
Hex. Chromium	(001032)	()	mg/l	_____	_____
Zinc	(001092)	()	mg/l	_____	_____
Copper	(001042)	()	mg/l	_____	_____
Lead	(017501)	()	mg/l	_____	_____
Cyanide	(000722)	()	mg/l	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____

Remarks low level analysis

*Date of Test Initiation # 3047 3239A

Sample Receipt

Mississippi DEQ/OPC Laboratory

Sample I.D. AA30862
Location code COMPLIANCE
Location Description GULF STATES CREOSOTE
Sample collector DUPTHEGROVE
Collection date: 05/15/2006
Lab submittal date: 05/17/2006
Due date: 05/17/2006
Matrix: SOIL

Login record file: 060517141611

Collection time: 14:35
Lab submittal time: 14:10

Division Code: 3047

STUDY COMPLIANCE
PERMIT_NO
DISCHARGE_NO
WADES_NO
OTHER_NO SS-03
SAMPLE_LOCATION SS 03
COUNTY_CODE
REQUESTED_BY TONY RUSSELL

Table with 3 columns: Analyses ordered, Method, Due Date. Row 1: POLYNUCLEAR AROMATIC HYDROCARBONS S / F Extract For PAH, 8270, 07/08/2006, 05/22/2006

Sample I.D. AA30863
Location code COMPLIANCE
Location Description GULF STATES CREOSOTE
Sample collector DUPTHEGROVE
Collection date: 05/16/2006
Lab submittal date: 05/17/2006
Due date: 05/17/2006
Matrix: SOIL

Login record file: 060517141611

Collection time: 14:45
Lab submittal time: 14:10

Division Code: 3047

STUDY COMPLIANCE
PERMIT_NO
DISCHARGE_NO
WADES_NO
OTHER_NO SW-09
SAMPLE_LOCATION SW 09
COUNTY_CODE
REQUESTED_BY TONY RUSSELL

Table with 3 columns: Analyses ordered, Method, Due Date. Row 1: POLYNUCLEAR AROMATIC HYDROCARBONS S / F Extract For PAH, 8270, 07/09/2006, 05/23/2006

Please refer to the indicated sample I.D. numbers when making inquiries.

Received by: _____



MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

CHAIN OF CUSTODY RECORD

POLLUTION CONTROL
LABORATORY
121 Fairmont Plaza
Pearl, Mississippi 39208

PROJECT NAME <i>Gulf States Concrete</i>					SHIPPED TO:										LAB USE ONLY	
LOCATION <i>Shelby County</i>					DATA TO: <i>T Russell</i>											
SAMPLE TYPES 1. SURFACE WATER 6. SOIL/SEDIMENT 2. GROUND WATER 7. SLUDGE 3. POTABLE WATER 8. WASTE 4. WASTEWATER 9. AIR 5. LEACHATE 10. FISH 11. OTHER					SAMPLERS (SIGN) A. <i>Dave Upthegrove</i> B. C. D.					CIRCLE/ADD parameter desired. List no. of containers submitted. ANALYSIS COD, TOC, NUTRIENTS BOD, SOLIDS METALS (Total) (Cd, Pb) EXT. ORG./PESTICIDES (TEL/P) PERS. AROMATICS HALOCARBONS CYANIDE FECAL COLIFORM OIL & GREASE/TPH Phenolics						
SITE NO.	SAMPLE TYPE	DATE	TIME	COMP GRAB	STATION LOCATION/DESCRIPTION					TOTAL CONTAINERS	REMARKS					
55-03	<i>12006</i>	5/15	1435	X	Surface Soil - 0 to 1 foot					1						30842
5W-09		5/16	1445	X	Subsurface Soil - 3 to 4 foot					1						30843
<i>Temp. 6.0°C</i>																
RELINQUISHED BY: (PRINT) <i>Tom Russell</i>		DATE/TIME <i>5/17/06</i> <i>1300</i>		RECEIVED BY: (PRINT) <i>E. Burdick</i>		RELINQUISHED BY: (PRINT) <i>E. Burdick</i>		DATE/TIME <i>5/17/2006</i> <i>1400</i>		RECEIVED BY: (PRINT) <i>JACKIE KEY</i>						
(SIGN) <i>Tom Russell</i>				(SIGN) <i>E. Burdick</i>		(SIGN) <i>E. Burdick</i>				(SIGN) <i>Jackie Key</i>						
RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)		RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)						
(SIGN)				(SIGN)		(SIGN)				(SIGN)						

NOTICE: Must use a separate form for each ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

4047



CHAIN OF CUSTODY RECORD

PROJECT NAME <i>Gulf States Concrete</i>					SHIPPED TO:										LAB USE ONLY			
LOCATION <i>Lockport</i>					DATA TO: <i>J. Russell</i>													
SAMPLE TYPES 1. SURFACE WATER 6. SOIL/SEDIMENT 2. GROUND WATER 7. SLUDGE 3. POTABLE WATER 8. WASTE 4. WASTEWATER 9. AIR 5. LEACHATE 10. FISH 11. OTHER					SAMPLERS (SIGN) A. <i>Dave Upthegrove</i> B. C. D.					ANALYSIS CIRCLE/ADD parameter desired. List no. of containers submitted. TOC, TDC, NUTRIENTS ROD. SOLIDS METALS (Total) (TCLP) EXT. ORGANICS (TCLP) PORG. AROMATICS HALOCARBONS CYANIDE FECAL COLIFORM OIL & GREASE/TPH PHENOLS								
SITE NO.	SAMPLE TYPE	DATE	TIME	COMP. GRAB	STATION LOCATION/DESCRIPTION	TOTAL CONTAINERS	TOC, TDC, NUTRIENTS	ROD. SOLIDS	METALS (Total) (TCLP)	EXT. ORGANICS (TCLP)	PORG. AROMATICS	HALOCARBONS	CYANIDE	FECAL COLIFORM	OIL & GREASE/TPH	PHENOLS	REMARKS	
55-03	6	5/15	1435	X	Surface Soil - 0 to 1 foot	1				1								30842
5W-09	6	5/16	1445	X	Subsurface Soil - 3 to 4 feet	1				1								30843
					Temp. 6.0°C													
RELINQUISHED BY: (PRINT) <i>Tom Russell</i>		DATE/TIME <i>5/17/06</i> <i>1300</i>		RECEIVED BY: (PRINT) <i>E. Swartz</i>		RELINQUISHED BY: (PRINT) <i>E. Swartz</i>		DATE/TIME <i>5/17/2006</i> <i>1400</i>		RECEIVED BY: (PRINT) <i>JACKIE KEY</i>		RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)		
(SIGN) <i>Tom Russell</i>				(SIGN) <i>E. Swartz</i>		(SIGN) <i>E. Swartz</i>				(SIGN) <i>J. Key</i>		(SIGN)				(SIGN)		

NOTICE: Must use a separate form for each ice chest.

DISTRIBUTION: White and Yellow copies accompany sample shipment to lab; Yellow copy retained by lab; White copy is returned to samplers; Pink copy retained by samplers.

4042

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Golf Estates Creek
County Code Forest NPDES Permit No. _____
Discharge No. _____ Date Requested 5/17/06
Sample Point Identification SW-09
Requested By Tony Russell Data To T Russell
Type of Sample: Grab () Composite (Flow) (Time) Other () _____

II. SAMPLE IDENTIFICATION: Environment Condition _____ Collected By D. Upthegrove
Where Taken Subsurface soil location 9 364 feet

1.	Type	Parameters	Preservative	Date	Time
	<u>Soil</u>	<u>PAHs</u>	<u>None</u>	<u>5/16/06</u>	<u>1745</u>
2.					
3.					
4.					
5.					

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

IV. TRANSPORTATION OF SAMPLE: Bus () , RO Vehicle () Other () OPC Vehicle
V. LABORATORY: Received By _____ Date 5-17-06 Time 1745
Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l		*
COD ₅	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			

Remarks _____
*Date of Test Initiation _____
#3047 3/16/03

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Circulate
County Code Illinois NPDES Permit No. _____
Discharge No. _____ Date Requested 5/17/06
Sample Point Identification SS-03
Requested By T. Russell Data To T. Russell
Type of Sample: Grab (Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION:
Environment Condition _____ Collected By D. Upthegrove
Where Taken Surface Soil Canyon 3 Canal Foot

Type	Parameters	Preservative	Date	Time
1. <u>Soil</u>	<u>PAHs</u>	<u>None</u>	<u>5/18/06</u>	<u>1435</u>
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()	_____	_____	_____
D.O.	(000300)	()	_____	_____	_____
Temperature	(000010)	()	_____	_____	_____
Residual Chlorine	(050060)	()	_____	_____	_____
Flow	(074060)	()	_____	_____	_____

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other (X) OPC Vehicle
V. LABORATORY: Received By _____ Date 5-17-06 Time 1435
Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	_____ mg/l	_____	*
COD ₅	(000340)	()	_____ mg/l	_____	_____
TOC	(000680)	()	_____ mg/l	_____	_____
Suspended Solids	(099000)	()	_____ mg/l	_____	_____
TKN	(000625)	()	_____ mg/l	_____	_____
Ammonia-N	(000610)	()	_____ mg/l	_____	_____
Fecal Coliform(1)	(074055)	()	_____ colonies/100 ml	_____	*
Fecal Coliform(2)	(074055)	()	_____ colonies/100 ml	_____	*
Total Phosphorus	(000665)	()	_____ mg/l	_____	_____
Oil and Grease(1)	(000550)	()	_____ mg/l	_____	_____
Oil and Grease(2)	(000550)	()	_____ mg/l	_____	_____
Chlorides	(099016)	()	_____ mg/l	_____	_____
Phenol	(032730)	()	_____ mg/l	_____	_____
Total Chromium	(001034)	()	_____ mg/l	_____	_____
Hex. Chromium	(001032)	()	_____ mg/l	_____	_____
Zinc	(001092)	()	_____ mg/l	_____	_____
Copper	(001042)	()	_____ mg/l	_____	_____
Lead	(017501)	()	_____ mg/l	_____	_____
Cyanide	(000722)	()	_____ mg/l	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____

Remarks _____

*Date of Test Initiation

3047

30162

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

COMPLIANCE MONITORING REPORT

To: TONY RUSSELL Sample ID: AA30862 Facility Name: GULF STATES CREOSOTE Sampling Loc: SS 03 Site ID: COMPLIANCE Discharge No: Other No: SS-03 Permit No: Latitude: Longitude: County:	QA Type: Date Collected: 05/15/2006 Time Collected: 14:35 Sample Collector: DUPTHEGROVE To Lab: SV Sample Type: SOIL Received By: JACKIE KEY LIMS Login Date: 05/17/2006 LIMS Login Time: 14:10 COC Date: 05/17/2006 COC Time: 1400 Project: 3047 Study: COMPLIANCE Reporting Date: 06/29/2006
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ANALYTE	METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
2-Methylnaphthalene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Acenaphthene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Acenaphthylene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Anthracene	8270	TRACE 137	µg/kg	330	JES	5/24/06	6/7/06
Benzo(a)anthracene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Benzo(a)pyrene	8270	TRACE 97.0	µg/kg	330	JES	5/24/06	6/7/06
Benzo(b)fluoranthene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Benzo(g,h,i)perylene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Benzo(k)fluoranthene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Chrysene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Dibenz(a,h)anthracene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Fluoranthene	8270	TRACE 323	µg/kg	330	JES	5/24/06	6/7/06
Fluorene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Indeno(1,2,3,cd)pyrene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Naphthalene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06

Phenanthrene	8270	TRACE 203	µg/kg	330	JES	5/24/06	6/7/06
Pyrene	8270	TRACE 242	µg/kg	330	JES	5/24/06	6/7/06
z 2-Fluorobiphenyl	8270	91%	µg/kg		JES	5/24/06	6/7/06
z Nitrobenzene-d5	8270	87%	µg/kg		JES	5/24/06	6/7/06
z p-Terphenyl-d14	8270	79%	µg/kg		JES	5/24/06	6/7/06

ABBREVIATIONS / DEFINITIONS

ug/L: micrograms/Liter

mg/L: milligrams/Liter

mg/kg: milligrams/

kilogram

ug/g: micrograms/gram

ppm: parts per million

ppb: parts per billion

<: less than

MCL: Maximum Contaminant Level

MDL: Method Detection Limit

LSPC: result less than lower specification

USPC: result greater than upper specification

TIE: Tentatively Identified or Estimated

>: greater than

z: surrogate


COC Date: Date Chain of Custody Signed

COC Time: Time Chain of Custody Signed

SAMPLE COMMENTS:

WHERE TAKEN: SURFACE SOIL LOCATION THREE ZERO TO ONE FOOT

COLLECTOR: DAVE UPTHEGROVE

Approved By: 

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Cresote
 County Code Forrest NPDES Permit No. _____
 Discharge No. _____ Date Requested 5/12/06
 Sample Point Identification SS-03
 Requested By Tony Russell Data To T. Russell
 Type of Sample: Grab Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION:
 Environment Condition _____ Collected By D. Upthegrove
 Where Taken Surface Soil Location 3 0101 foot

	Type	Parameters	Preservative	Date	Time
1.	<u>soil</u>	<u>PAHs</u>	<u>None</u>	<u>5/15/06</u>	<u>1435</u>
2.					
3.					
4.					
5.					

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other orc Vehicle

V. LABORATORY: Received By _____ Date 5-17-06 Time 1400
 Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ⁵	(000310)	()	mg/l		*
COD ⁵	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			

Remarks _____

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

COMPLIANCE MONITORING REPORT

<p>To: TONY RUSSELL</p>	<p>QA Type:</p> <p>Date Collected: 05/16/2006</p> <p>Time Collected: 14:45</p> <p>Sample Collector: DUPTHEGROVE</p> <p>To Lab: SV</p>
<p>Sample ID: AA30863</p> <p>Facility Name: GULF STATES CREOSOTE</p> <p>Sampling Loc: SW 09</p> <p>Site ID: COMPLIANCE</p> <p>Discharge No:</p> <p>Other No: SW-09</p> <p>Permit No:</p> <p>Latitude:</p> <p>Longitude:</p> <p>County:</p>	<p>Sample Type: SOIL</p> <p>Received By: JACKIE KEY</p> <p>LIMS Login Date: 05/17/2006</p> <p>LIMS Login Time: 14:10</p> <p>COC Date: 05/17/2006</p> <p>COC Time: 1400</p> <p>Project: 3047</p> <p>Study: COMPLIANCE</p> <p>Reporting Date: 06/29/2006</p>

ANALYTE	METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
2-Methylnaphthalene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Acenaphthene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Acenaphthylene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Anthracene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Benzo(a)anthracene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Benzo(a)pyrene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Benzo(b)fluoranthene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Benzo(g,h,i)perylene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Benzo(k)fluoranthene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Chrysene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Dibenz(a,h)anthracene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Fluoranthene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Fluorene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Indeno(1,2,3,cd)pyrene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Naphthalene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06

Phenanthrene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
Pyrene	8270	ND	µg/kg	330	JES	5/24/06	6/7/06
z 2-Fluorobiphenyl	8270	85%	µg/kg		JES	5/24/06	6/7/06
z Nitrobenzene-d5	8270	78%	µg/kg		JES	5/24/06	6/7/06
z p-Terphenyl-d14	8270	80%	µg/kg		JES	5/24/06	6/7/06

ABBREVIATIONS / DEFINITIONS

ug/L: micrograms/Liter	<: less than	COC Date: Date Chain of Custody Signed
mg/L: milligrams/Liter	MCL: Maximum Contaminant Level	COC Time: Time Chain of Custody Signed
mg/kg: milligrams/kilogram	MDL: Method Detection Limit	
ug/g: micrograms/gram	LSPC: result less than lower specification	
ppm: parts per million	USPC: result greater than upper specification	
ppb: parts per billion	TIE: Tentatively Identified or Estimated	
	>: greater than	
	z: surrogate	

SAMPLE COMMENTS:

WHERE TAKEN: SUBSURFACE SOIL LOCATION NINE 3 TO 4 FOOT

COLLECTOR: DAVE UPTHEGROVE

Approved By: 

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Concrete
County Code Fernex NPDES Permit No. _____
Discharge No. _____ Date Requested 5/17/06
Sample Point Identification SW-09
Requested By Tony Russell Data To T Russell
Type of Sample: Grab (X) Composite (Flow) (Time) Other () _____

II. SAMPLE IDENTIFICATION:
Environment Condition _____ Collected By D. Uppelgrave
Where Taken Subsurface Soil location 9 364 Roof
Type Parameters Preservative Date Time
1. Soil PATHs None 5/16/06 1445
2. _____
3. _____
4. _____
5. _____

III. FIELD:
Analysis Computer Code Request Results Analyst Date
pH (000400) () _____
D.O. (000300) () _____
Temperature (000010) () _____
Residual Chlorine (050060) () _____
Flow (074060) () _____

IV. TRANSPORTATION OF SAMPLE: Bus () RC Vehicle () Other (X) OPC Vehicle
V. LABORATORY: Received By _____ Date 5-17-06 Time 1400
Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l		*
COD ₅	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____

Remarks _____



CHAIN OF CUSTODY RECORD

MSD				PROJECT LEADER		REMARKS		TOTAL CONTAINERS	CIRCLE/ADD parameters desired. List no. of containers submitted.	ANALYSIS								Custody Seals Intact at Lab Seals Not Intact Upon Recv pt by Lab	LAB USE ONLY	
PROJECT NAME/LOCATION				SAMPLER		DATA TO:				VOA	Sem Volatile Orgs	Pest/PCBs	METALS	CYANIDE	TAG NO./REMARKS					
ESD SAMPLE TYPES																				
1. SURFACE WATER	2. GROUND WATER	3. POTABLE WATER	4. WASTEWATER	5. LEACHATE	6. SOIL/SEDIMENT	7. SLUDGE	8. WASTE	9. AIR	10. FISH	DAVE UPTMEGRAD		BRAD BLALOCK		T. Russell						
11. OTHER																				
STATION NO.	SAMPLE TYPE	DATE	TIME	COMP	GRA B	STATION LOCATION/DESCRIPTION														
MW-18		2/12/13	1400	X		Monitor Well 18		4	2										30011	
MW-14		2/12/14	1545	X		Monitor Well 14		4	2										30012	
GEO-102		6/12/14	1340	X		GEO-102 5 to 6 foot interval		1	1										30013	
GEO-113		6/12/14	1530	X		GEO-113 3 to 4 foot interval		1	1										30014	
Temp. 3.2°C TS																				
RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)		RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)		RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)				
Tony Russell		12/15/01		Amy Sawyer																
(SIGN)		0830		(SIGN)																
RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)		RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)		RELINQUISHED BY: (PRINT)		DATE/TIME		RECEIVED BY: (PRINT)				
(SIGN)				(SIGN)																

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Coastal States Creosote
 County Code Forest NPDES Permit No. _____
 Discharge No. _____ Date Requested 12/19/05
 Sample Point Identification M-11-18
 Requested By T Russell Date To T Russell
 Type of Sample: Grab (x) Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION:
 Environment Condition 60° Sunny Collected By B. S. [unclear]
 Where Taken Monitor Wall 180

Type	Parameters	Preservative	Date	Time
1. <u>grab samples</u>	<u>VOCs</u>	<u>HCL</u>	<u>12/19/05</u>	<u>1400</u>
2. _____	<u>multi-trials</u>	<u>Zn</u>		
3. _____				
4. _____				
5. _____				

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other (x) UPC Vehicle

V. LABORATORY: Received By [Signature] Date 12/15/05 Time 0830
 Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l		*
COD ₅	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
_____		()			
_____		()			
_____		()			
_____		()			
_____		()			
_____		()			
_____		()			
_____		()			
_____		()			
_____		()			
_____		()			

Remarks _____

*Date of Test Initiation _____

#3047

30011

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Concrete
County Code 11114 NPDES Permit No. _____
Discharge No. _____ Date Requested 12/15/95
Sample Point Identification MW-19
Requested By T. Russell Date To T. Russell
Type of Sample: Grab () Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION:
Environment Condition _____ Collected By B. Stafford
Where Taken Monitor Well 19

Type	Parameters	Preservative	Date	Time
1. <u>Flow</u>	<u>Heavy Metals</u>	<u>FC</u>	<u>12/14/95</u>	<u>15 35</u>
2.	<u>VCBS</u>	<u>FC</u>		
3.				
4.				
5.				

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other ()
V. LABORATORY: Received By Jerry Jones Date 12/15/95 Time 0830
Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l		*
COD ₅	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			

Remarks _____

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No. _____

I. **GENERAL INFORMATION:** Facility Name Gulf States Concrete
 County Code Forest NPDES Permit No. _____
 Discharge No. _____ Date Requested 12/15/05
 Sample Point Identification GEU-102
 Requested By T. Russell II Data To T. Russell II
 Type of Sample: Grab () Composite (Flow) (Time) Other () _____

II. **SAMPLE IDENTIFICATION:**
 Environment Condition 55° Overcast Collected By V. Vothayouk
 Where Taken GEU-112 5 mi. h. hwy 140 km

	Type	Parameters	Preservative	Date	Time
1.	<u>soil</u>	<u>Trace Metals</u>	<u>None</u>	<u>12/14/05</u>	<u>1300</u>
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____

III. **FIELD:**

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()	_____	_____	_____
D.O.	(000300)	()	_____	_____	_____
Temperature	(000010)	()	_____	_____	_____
Residual Chlorine	(050060)	()	_____	_____	_____
Flow	(074060)	()	_____	_____	_____

IV. **TRANSPORTATION OF SAMPLE:** Bus () RO Vehicle () Other OPC Vehicle

V. **LABORATORY:** Received By _____ Date 11/15/05 Time 0830
 Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l	_____	*
COD ₅	(000340)	()	mg/l	_____	_____
TOC	(000680)	()	mg/l	_____	_____
Suspended Solids	(099000)	()	mg/l	_____	_____
TKN	(000625)	()	mg/l	_____	_____
Ammonia-N	(000610)	()	mg/l	_____	_____
Fecal Coliform(1)	(074055)	()	colonies/100 ml	_____	*
Fecal Coliform(2)	(074055)	()	colonies/100 ml	_____	*
Total Phosphorus	(000665)	()	mg/l	_____	_____
Oil and Grease(1)	(000550)	()	mg/l	_____	_____
Oil and Grease(2)	(000550)	()	mg/l	_____	_____
Chlorides	(099016)	()	mg/l	_____	_____
Phenol	(032730)	()	mg/l	_____	_____
Total Chromium	(001034)	()	mg/l	_____	_____
Hex. Chromium	(001032)	()	mg/l	_____	_____
Zinc	(001092)	()	mg/l	_____	_____
Copper	(001042)	()	mg/l	_____	_____
Lead	(017501)	()	mg/l	_____	_____
Cyanide	(000722)	()	mg/l	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
Remarks	_____				

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Corrosion
County Code Permit NPDES Permit No. _____
Discharge No. _____ Date Requested 12/15/05
Sample Point Identification GEC-113
Requested By T. Russell Date To T. Russell
Type of Sample: Grab () Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION: Environment Condition _____ Collected By D. Upthegrove
Where Taken GEC-113 364 feet inland

Type	Parameters	Preservative	Date	Time
1. <u>Soil</u>	<u>Sample UCC</u>	<u>None</u>	<u>12/14/05</u>	<u>15:30</u>
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()	_____	_____	_____
D.O.	(000300)	()	_____	_____	_____
Temperature	(000010)	()	_____	_____	_____
Residual Chlorine	(050060)	()	_____	_____	_____
Flow	(074060)	()	_____	_____	_____

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other OPC Vehicle

V. LABORATORY: Received By Cherry D... Date 12/15/05 Time 08:30
Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l	_____	*
COD ₅	(000340)	()	mg/l	_____	_____
TOC	(000680)	()	mg/l	_____	_____
Suspended Solids	(099000)	()	mg/l	_____	_____
TKN	(000625)	()	mg/l	_____	_____
Ammonia-N	(000610)	()	mg/l	_____	_____
Fecal Coliform(1)	(074055)	()	colonies/100 ml	_____	*
Fecal Coliform(2)	(074055)	()	colonies/100 ml	_____	*
Total Phosphorus	(000665)	()	mg/l	_____	_____
Oil and Grease(1)	(000550)	()	mg/l	_____	_____
Oil and Grease(2)	(000550)	()	mg/l	_____	_____
Chlorides	(099016)	()	mg/l	_____	_____
Phenol	(032730)	()	mg/l	_____	_____
Total Chromium	(001034)	()	mg/l	_____	_____
Hex. Chromium	(001032)	()	mg/l	_____	_____
Zinc	(001092)	()	mg/l	_____	_____
Copper	(001042)	()	mg/l	_____	_____
Lead	(017501)	()	mg/l	_____	_____
Cyanide	(000722)	()	mg/l	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____
_____	()	()	_____	_____	_____

Remarks _____

Sample Receipt

Mississippi DEQ/OPC Laboratory

Sample I.D. AA30011

Location code **C0350009**

Location Description **GULF STATES CREOSOTE**

Sample collector **BBLALOCK**

Collection date: **12/13/2005**

Lab submittal date: **12/15/2005**

Due date: **12/15/2005**

Matrix: **GROUNDWATER**

Login record file: **051215091231**

Collection time: **14:00**

Lab submittal time: **08:45**

Division Code: **3047**

STUDY COMPLIANCE

PERMIT_NO _____

DISCHARGE_NO _____

WADES_NO _____

OTHER_NO **MW-18**

SAMPLE_LOCATION **MW 18**

COUNTY_CODE **035 FORREST**

REQUESTED_BY **TONY RUSSELL**

Analyses ordered

EPA 8260 VOLATILE ORGANICS IN WATER

EPA 8270 SEMIVOL ORG COMPOUNDS

Extract For Semi-Volatile Analysis

Method

8260W

8270

Due Date

12/20/2005

01/23/2006

12/20/2005

Sample I.D. AA30012

Location code **C0350014**

Location Description **GULF STATES CREOSOTE**

Sample collector **BBLALOCK**

Collection date: **12/14/2005**

Lab submittal date: **12/15/2005**

Due date: **12/15/2005**

Matrix: **GROUNDWATER**

Login record file: **051215091231**

Collection time: **15:45**

Lab submittal time: **08:45**

Division Code: **3047**

STUDY COMPLIANCE

PERMIT_NO _____

DISCHARGE_NO _____

WADES_NO _____

OTHER_NO **MW-14**

SAMPLE_LOCATION **MW 14**

COUNTY_CODE **035 FORREST**

REQUESTED_BY **TONY RUSSELL**

Analyses ordered

EPA 8260 VOLATILE ORGANICS IN WATER

EPA 8270 SEMIVOL ORG COMPOUNDS

Extract For Semi-Volatile Analysis

Method

8260W

8270

Due Date

12/20/2005

01/24/2006

12/21/2005

Sample I.D. AA30013
Location code C0350015
Location Description GULF STATES CREOSOTE
Sample collector BBLALOCK
Collection date: 12/14/2005
Lab submittal date: 12/15/2005
Due date: 12/15/2005
Matrix: SOIL

Login record file: 051215091231

Collection time: 13:40
Lab submittal time: 08:46

Division Code: 3047

STUDY COMPLIANCE
PERMIT_NO _____
DISCHARGE_NO _____
WADES_NO _____
OTHER_NO GEO 102
SAMPLE_LOCATION GEO 102
COUNTY_CODE 035 FORREST
REQUESTED_BY TONY RUSSELL

Analyses ordered	Method	Due Date
EPA 8270 SEMI-VOLATILE ORGANICS Extract For Semi-Volatile Analysis	8270	01/24/2006 12/21/2005

Sample I.D. AA30014
Location code C0350016
Location Description GULF STATES CREOSOTE
Sample collector BBLALOCK
Collection date: 12/14/2005
Lab submittal date: 12/15/2005
Due date: 12/15/2005
Matrix: SOIL

Login record file: 051215091231

Collection time: 15:30
Lab submittal time: 08:46

Division Code: 3047

STUDY COMPLIANCE
PERMIT_NO _____
DISCHARGE_NO _____
WADES_NO _____
OTHER_NO GEO 113
SAMPLE_LOCATION GEO 113
COUNTY_CODE 035 FORREST
REQUESTED_BY TONY RUSSELL

Analyses ordered	Method	Due Date
EPA 8270 SEMI-VOLATILE ORGANICS Extract For Semi-Volatile Analysis	8270	01/24/2006 12/21/2005

Please refer to the indicated sample I.D. numbers when making inquiries.

Received by: _____

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

COMPLIANCE MONITORING REPORT

To: TONY RUSSELL	QA Type: Date Collected: 12/14/2005 Time Collected: 13:40 Sample Collector: DUPTHEGROVE To Lab: SV
Sample ID: AA30013 Facility Name: GULF STATES CREOSOTE Sampling Loc: GEO 102 Site ID: C0350015 Discharge No: Other No: GEO 102 Permit No: Latitude: Longitude: County: 035 FORREST	Sample Type: SOIL Received By: TAMMY SAWYER LIMS Login Date: 12/15/2005 LIMS Login Time: 08:46 COC Date: 12/15/2005 COC Time: 0830 Project: 3047 Study: COMPLIANCE Reporting Date: 01/24/2006

ANALYTE	METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
1,2,4-Trichlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
1,2-Dichlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
1,3-Dichlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
1,4-Dichlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4,5-Trichlorophenol	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
2,4,6-Trichlorophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4-Dichlorophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4-Dimethylphenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4-Dinitrophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4-Dinitrotoluene	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
2,6-Dinitrotoluene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2-Chloronaphthalene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2-Chlorophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2-Methylnaphthalene	8270	TRACE 252	ug/kg	330	JES	12/21/05	1/17/06
2-Methylphenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06

2-Nitroaniline	827	ND	ug/kg	1600	JES	12/21/05	1/17/06
2-Nitrophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
3,3'-Dichlorobenzidine	8270	ND	ug/kg	660	JES	12/21/05	1/17/06
3-Nitroaniline	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
4,6-Dinitro-2-methylphenol	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
4-Bromophenyl-phenylether	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Chloro-3-methylphenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Chloroaniline	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Chlorophenyl-phenylether	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Methylphenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Nitroaniline	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
4-Nitrophenol	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
Acenaphthene	8270	487	ug/kg	330	JES	12/21/05	1/17/06
Acenaphthylene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Anthracene	8270	401	ug/kg	330	JES	12/21/05	1/17/06
Benzo[a]anthracene	8270	TRACE 160	ug/kg	330	JES	12/21/05	1/17/06
Benzo[a]pyrene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Benzo[b]fluoranthene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Benzo[g,h,i]perylene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Benzo[k]fluoranthene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Benzoic Acid	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
Benzyl alcohol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
bis(2-Chloroethoxy)methane	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
bis(2-Chloroethyl)ether	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
bis(2-chloroisopropyl)ether	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
bis(2-Ethylhexyl)phthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Butylbenzylphthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Carbazole	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Chrysene	8270	TRACE 129	ug/kg	330	JES	12/21/05	1/17/06
Dibenz[a,h]anthracene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Dibenzofuran	8270	662	ug/kg	330	JES	12/21/05	1/17/06
Diethylphthalate	8270	*587	ug/kg	330	JES	12/21/05	1/17/06
Dimethylphthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Di-n-butylphthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Di-n-octylphthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Fluoranthene	8270	899	ug/kg	330	JES	12/21/05	1/17/06
Fluorene	8270	678	ug/kg	330	JES	12/21/05	1/17/06
Hexachlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Hexachlorobutadiene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Hexachlorocyclopentadiene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06

Hexachloroethane	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Indeno[1,2,3-cd]pyrene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Isophorone	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Naphthalene	8270	663	ug/kg	330	JES	12/21/05	1/17/06
Nitrobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
N-Nitroso-di-n-propylamine	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
n-Nitrosodiphenylamine	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Pentachlorophenol	8270	ND	ug/kg	660	JES	12/21/05	1/17/06
Phenanthrene	8270	2230	ug/kg	330	JES	12/21/05	1/17/06
Phenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Pyrene	8270	577	ug/kg	330	JES	12/21/05	1/17/06
z 2,4,6-Tribromophenol	8270	44%	ug/kg	19-122	JES	12/21/05	1/17/06
z 2-Fluorobiphenyl	8270	50%	ug/kg	30-115	JES	12/21/05	1/17/06
z 2-Fluorophenol	8270	31%	ug/kg	25-121	JES	12/21/05	1/17/06
z Nitrobenzene-d5	8270	42%	ug/kg	23-120	JES	12/21/05	1/17/06
z Phenol-d5	8270	31%	ug/kg	24-113	JES	12/21/05	1/17/06
z p-Terphenyl-d14	8270	55%	ug/kg	18-137	JES	12/21/05	1/17/06

ABBREVIATIONS / DEFINITIONS

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg: milligrams/
kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

COC Date: Date Chain of Custody Signed
COC Time: Time Chain of Custody Signed

SAMPLE COMMENTS:

ENVIRONMENT CONDITION: 55 DEGREES FAHRENHEIT

COLLECTOR: DAVE UPTHEGROVE

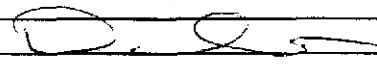
WHERE TAKEN: GEO 112 5 TO 6 FOOT INTERVAL

REMARKS: ODOR

Semi-Vol:

1) *The Blank for this sample set contains 1150 ug/Kg Diethylphthalate.

JES

Approved By: 

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Concrete
 County Code Forrest NPDES Permit No. _____
 Discharge No. _____ Date Requested 12/15/05
 Sample Point Identification GEO-112
 Requested By T Russell Data To T Russell
 Type of Sample: Grab () Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION:
 Environment Condition 55° overcast Collected By D. Vothegrove
 Where Taken GEO-112 5 to 6 foot interval

Type	Parameters	Preservative	Date	Time
1. <u>Soil</u>	<u>Semi-VOCs</u>	<u>None</u>	<u>12/14/05</u>	<u>1340</u>
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()	_____	_____	_____
D.O.	(000300)	()	_____	_____	_____
Temperature	(000010)	()	_____	_____	_____
Residual Chlorine	(050060)	()	_____	_____	_____
Flow	(074060)	()	_____	_____	_____

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other OPC Vehicle
V. LABORATORY: Received By Jenny Jagers Date 12/15/05 Time 0830
 Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l	_____	*
COD ₅	(000340)	()	mg/l	_____	_____
TOC	(000680)	()	mg/l	_____	_____
Suspended Solids	(099000)	()	mg/l	_____	_____
TKN	(000625)	()	mg/l	_____	_____
Ammonia-N	(000610)	()	mg/l	_____	_____
Fecal Coliform(1)	(074055)	()	colonies/100 ml	_____	*
Fecal Coliform(2)	(074055)	()	colonies/100 ml	_____	*
Total Phosphorus	(000665)	()	mg/l	_____	_____
Oil and Grease(1)	(000550)	()	mg/l	_____	_____
Oil and Grease(2)	(000550)	()	mg/l	_____	_____
Chlorides	(099016)	()	mg/l	_____	_____
Phenol	(032730)	()	mg/l	_____	_____
Total Chromium	(001034)	()	mg/l	_____	_____
Hex. Chromium	(001032)	()	mg/l	_____	_____
Zinc	(001092)	()	mg/l	_____	_____
Copper	(001042)	()	mg/l	_____	_____
Lead	(017501)	()	mg/l	_____	_____
Cyanide	(000722)	()	mg/l	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____
_____	_____	()	_____	_____	_____

Remarks _____

*Date of Test Initiation

3047

30013

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

COMPLIANCE MONITORING REPORT

To: TONY RUSSELL	QA Type: Date Collected: 12/14/2005 Time Collected: 15:30 Sample Collector: DUPTHEGROVE To Lab: SV
Sample ID: AA30014 Facility Name: GULF STATES CREOSOTE Sampling Loc: GEO 113 Site ID: C0350016 Discharge No: Other No: GEO 113 Permit No: Latitude: Longitude: County: 035 FORREST	Sample Type: SOIL Received By: TAMMY SAWYER LIMS Login Date: 12/15/2005 LIMS Login Time: 08:46 COC Date: 12/15/2005 COC Time: 0830 Project: 3047 Study: COMPLIANCE Reporting Date: 01/24/2006

ANALYTE	METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
1,2,4-Trichlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
1,2-Dichlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
1,3-Dichlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
1,4-Dichlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4,5-Trichlorophenol	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
2,4,6-Trichlorophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4-Dichlorophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4-Dimethylphenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4-Dinitrophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2,4-Dinitrotoluene	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
2,6-Dinitrotoluene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2-Chloronaphthalene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2-Chlorophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
2-Methylnaphthalene	8270	TRACE 178	ug/kg	330	JES	12/21/05	1/17/06
2-Methylphenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06

2-Nitroaniline	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
2-Nitrophenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
3,3'-Dichlorobenzidine	8270	ND	ug/kg	660	JES	12/21/05	1/17/06
3-Nitroaniline	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
4,6-Dinitro-2-methylphenol	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
4-Bromophenyl-phenylether	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Chloro-3-methylphenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Chloroaniline	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Chlorophenyl-phenylether	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Methylphenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
4-Nitroaniline	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
4-Nitrophenol	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
Acenaphthene	8270	2160	ug/kg	330	JES	12/21/05	1/17/06
Acenaphthylene	8270	TRACE 169	ug/kg	330	JES	12/21/05	1/17/06
Anthracene	8270	1240	ug/kg	330	JES	12/21/05	1/17/06
Benzo[a]anthracene	8270	508	ug/kg	330	JES	12/21/05	1/17/06
Benzo[a]pyrene	8270	TRACE 192	ug/kg	330	JES	12/21/05	1/17/06
Benzo[b]fluoranthene	8270	TRACE 258	ug/kg	330	JES	12/21/05	1/17/06
Benzo[g,h,i]perylene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Benzo[k]fluoranthene	8270	TRACE 104	ug/kg	330	JES	12/21/05	1/17/06
Benzoic Acid	8270	ND	ug/kg	1600	JES	12/21/05	1/17/06
Benzyl alcohol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
bis(2-Chloroethoxy)methane	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
bis(2-Chloroethyl)ether	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
bis(2-chloroisopropyl)ether	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
bis(2-Ethylhexyl)phthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Butylbenzylphthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Carbazole	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Chrysene	8270	421	ug/kg	330	JES	12/21/05	1/17/06
Dibenz[a,h]anthracene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Dibenzofuran	8270	1880	ug/kg	330	JES	12/21/05	1/17/06
Diethylphthalate	8270	*525	ug/kg	330	JES	12/21/05	1/17/06
Dimethylphthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Di-n-butylphthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Di-n-octylphthalate	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Fluoranthene	8270	2610	ug/kg	330	JES	12/21/05	1/17/06
Fluorene	8270	2710	ug/kg	330	JES	12/21/05	1/17/06
Hexachlorobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Hexachlorobutadiene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Hexachlorocyclopentadiene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06

Hexachloroethane	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Indeno[1,2,3-cd]pyrene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Isophorone	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Naphthalene	8270	2170	ug/kg	330	JES	12/21/05	1/17/06
Nitrobenzene	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
N-Nitroso-di-n-propylamine	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
n-Nitrosodiphenylamine	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Pentachlorophenol	8270	ND	ug/kg	660	JES	12/21/05	1/17/06
Phenanthrene	8270	5700	ug/kg	330	JES	12/21/05	1/17/06
Phenol	8270	ND	ug/kg	330	JES	12/21/05	1/17/06
Pyrene	8270	1630	ug/kg	330	JES	12/21/05	1/17/06
z 2,4,6-Tribromophenol	8270	42%	ug/kg	19-122	JES	12/21/05	1/17/06
z 2-Fluorobiphenyl	8270	47%	ug/kg	30-115	JES	12/21/05	1/17/06
z 2-Fluorophenol	8270	27%	ug/kg	25-121	JES	12/21/05	1/17/06
z Nitrobenzene-d5	8270	39%	ug/kg	23-120	JES	12/21/05	1/17/06
z Phenol-d5	8270	28%	ug/kg	24-113	JES	12/21/05	1/17/06
z p-Terphenyl-d14	8270	50%	ug/kg	18-137	JES	12/21/05	1/17/06

ABBREVIATIONS / DEFINITIONS

ug/L: micrograms/Liter
 mg/L: milligrams/Liter
 mg/kg: milligrams/
 kilogram
 ug/g: micrograms/gram
 ppm: parts per million
 ppb: parts per billion

<: less than
 MCL: Maximum Contaminant Level
 MDL: Method Detection Limit
 LSPC: result less than lower specification
 USPC: result greater than upper specification
 TIE: Tentatively Identified or Estimated
 >: greater than
 z: surrogate

COC Date: Date Chain of Custody Signed
 COC Time: Time Chain of Custody Signed

SAMPLE COMMENTS:

ENVIRONMENT CONDITION: 60 DEGREES FAHRENHEIT

COLLECTOR: DAVE UPTHEGROVE


WHERE TAKEN: GEO 113 3 TO 4 FOOT INTERVAL

REMARKS: ODOR

Semi-Vol:

1) *The Blank for this extraction set contains 1150 ug/Kg Diethylphthalate.

JES

Approved By: 

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Creosote
County Code Permit NPDES Permit No. _____
Discharge No. _____ Date Requested 12/15/05
Sample Point Identification GEO-113
Requested By T Russell Data To T Russell
Type of Sample: Grab () Composite (Flow) (Time) Other () _____

II. SAMPLE IDENTIFICATION: Environment Condition _____ Collected By D. Upthegrove
Where Taken GEO-113 3 to 4 feet interval

	Type	Parameters	Preservative	Date	Time
1.	<u>Sil</u>	<u>Semi-VOC</u>	<u>None</u>	<u>12/14/05</u>	<u>1530</u>
2.					
3.					
4.					
5.					

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()	_____	_____	_____
D.O.	(000300)	()	_____	_____	_____
Temperature	(000010)	()	_____	_____	_____
Residual Chlorine	(050060)	()	_____	_____	_____
Flow	(074060)	()	_____	_____	_____

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other oppc Vehicle

V. LABORATORY: Received By Jimmy Sawyer Date 12/15/05 Time 0830
Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	_____ mg/l	_____	*
COD ₅	(000340)	()	_____ mg/l	_____	_____
TOC	(000680)	()	_____ mg/l	_____	_____
Suspended Solids	(099000)	()	_____ mg/l	_____	_____
TKN	(000625)	()	_____ mg/l	_____	_____
Ammonia-N	(000610)	()	_____ mg/l	_____	_____
Fecal Coliform(1)	(074055)	()	_____ colonies/100 ml	_____	*
Fecal Coliform(2)	(074055)	()	_____ colonies/100 ml	_____	*
Total Phosphorus	(000665)	()	_____ ug/l	_____	_____
Oil and Grease(1)	(000550)	()	_____ mg/l	_____	_____
Oil and Grease(2)	(000550)	()	_____ mg/l	_____	_____
Chlorides	(099016)	()	_____ mg/l	_____	_____
Phenol	(032730)	()	_____ mg/l	_____	_____
Total Chromium	(001034)	()	_____ mg/l	_____	_____
Hex. Chromium	(001032)	()	_____ mg/l	_____	_____
Zinc	(001092)	()	_____ mg/l	_____	_____
Copper	(001042)	()	_____ mg/l	_____	_____
Lead	(017501)	()	_____ mg/l	_____	_____
Cyanide	(000722)	()	_____ mg/l	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____
		()	_____	_____	_____

Remarks _____

*Date of Test Initiation _____ 3047 30014

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

COMPLIANCE MONITORING REPORT

<p>To: TONY RUSSELL</p>	<p>QA Type:</p> <p>Date Collected: 12/14/2005</p> <p>Time Collected: 15:45</p> <p>Sample Collector: BBLALOCK</p> <p>To Lab: SV</p>
<p>Sample ID: AA30012</p> <p>Facility Name: GULF STATES CREOSOTE</p> <p>Sampling Loc: MW 14</p> <p>Site ID: C0350014</p> <p>Discharge No:</p> <p>Other No: MW-14</p> <p>Permit No:</p> <p>Latitude:</p> <p>Longitude:</p> <p>County: 035 FORREST</p>	<p>Sample Type: GROUNDWATER</p> <p>Received By: TAMMY SAWYER</p> <p>LIMS Login Date: 12/15/2005</p> <p>LIMS Login Time: 08:45</p> <p>COC Date: 12/15/2005</p> <p>COC Time: 0830</p> <p>Project: 3047</p> <p>Study: COMPLIANCE</p> <p>Reporting Date: 01/09/2006</p>

ANALYTE	METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS START DATE	ANALYSIS END DATE
1,1,1,2-Tetrachloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1,1-Trichloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1,2,2-Tetrachloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1,2-Trichloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1-Dichloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1-Dichloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1-Dichloropropene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2,3-Trichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2,3-Trichloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2,4-Trichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2,4-Trimethylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2-Dibromo-3-chloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2-Dibromoethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2-Dichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2-Dichloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05

1,2-Dichloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,3,5-Trimethylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,3-Dichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,3-Dichloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,4-Dichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
2,2-Dichloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
2-Butanone (MEK)	8260W	ND	ug/L	25	BA	12/19/05	12/19/05
2-Chlorotoluene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
2-Hexanone	8260W	ND	ug/L	25	BA	12/19/05	12/19/05
4-Chlorotoluene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
4-Isopropyltoluene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
4-Methyl-2-pentanone (MIBK)	8260W	ND	ug/L	25	BA	12/19/05	12/19/05
Acetone	8260W	ND	ug/L	25	BA	12/19/05	12/19/05
Benzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromochloromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromodichloromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromoform	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromomethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Carbon Tetrachloride	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Chlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Chloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Chloroform	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Chloromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
cis-1,2-Dichloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
cis-1,3-Dichloropropene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Dibromochloromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Dibromomethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Dichlorodifluoromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Ethylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Hexachlorobutadiene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Isopropylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
m & p -Xylene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Methyl tertiary butyl ether	8260W	NA	ug/L	5	BA	12/19/05	12/19/05
Methylene Chloride	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Naphthalene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
n-Butylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
n-Propylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
o - Xylene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
sec-Butylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05

Styrene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
tert-Butylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Tetrachloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Toluene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
trans-1,2-Dichloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
trans-1,3-dichloropropene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Trichloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Trichlorofluoromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Vinyl Chloride	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
z 1,2-Dichloroethane-d4	8260W	97%	ug/L	80-120	BA	12/19/05	12/19/05
z Dibromofluoromethane	8260W	97%	ug/L	80-118	BA	12/19/05	12/19/05
z p-Bromofluorobenzene	8260W	98%	ug/L	80-115	BA	12/19/05	12/19/05
z Toluene-d8	8260W	101%	ug/L	80-118	BA	12/19/05	12/19/05
1,2,4-Trichlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
1,2-Dichlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
1,3-Dichlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
1,4-Dichlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4,5-Trichlorophenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4,6-Trichlorophenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4-Dichlorophenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4-Dimethylphenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4-Dinitrophenol	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
2,4-Dinitrotoluene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,6-Dinitrotoluene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Chloronaphthalene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Chlorophenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Methylnaphthalene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Methylphenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Nitroaniline	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
2-Nitrophenol	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
3,3'-Dichlorobenzidine	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
3-Nitroaniline	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
4,6-Dinitro-2-methylphenol	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
4-Bromophenyl-phenylether	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
4-Chloro-3-methylphenol	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
4-Chloroaniline	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
4-Chlorophenyl-phenylether	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
4-Methylphenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
4-Nitroaniline	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
4-Nitrophenol	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06

Acenaphthene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Acenaphthylene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Anthracene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzo[a]anthracene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzo[a]pyrene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzo[b]fluoranthene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzo[g,h,i]perylene	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Benzo[k]fluoranthene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzoic Acid	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
Benzyl alcohol	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
bis(2-Chloroethoxy)methane	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
bis(2-Chloroethyl)ether	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
bis(2-chloroisopropyl)ether	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
bis(2-Ethylhexyl)phthalate	8270	TRACE 7.21	ug/L	10.00	JES	12/20/05	1/5/06
Butylbenzylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Carbazole	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Chrysene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Dibenz[a,h]anthracene	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Dibenzofuran	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Diethylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Dimethylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Di-n-butylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Di-n-octylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Fluoranthene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Fluorene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Hexachlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Hexachlorobutadiene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Hexachlorocyclopentadiene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Hexachloroethane	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Indeno[1,2,3-cd]pyrene	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Isophorone	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Naphthalene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Nitrobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
N-Nitroso-di-n-propylamine	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
n-Nitrosodiphenylamine	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Pentachlorophenol	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
Phenanthrene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Phenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Pyrene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
z 2,4,6-Tribromophenol	8270	69%	ug/L	10-123	JES	12/20/05	1/5/06

z 2-Fluorobiphenyl	8270	88%	ug/L	43-116	JES	12/20/05	1/5/06
z 2-Fluorophenol	8270	70%	ug/L	21-100	JES	12/20/05	1/5/06
z Nitrobenzene-d5	8270	85%	ug/L	35-114	JES	12/20/05	1/5/06
z Phenol-d5	8270	78%	ug/L	10-194	JES	12/20/05	1/5/06
z Terphenyl-d14	8270	83%	ug/L	33-141	JES	12/20/05	1/5/06

ABBREVIATIONS / DEFINITIONS

ug/L: micrograms/Liter
mg/L: milligrams/Liter
mg/kg:
milligrams/kilogram
ug/g: micrograms/gram
ppm: parts per million
ppb: parts per billion

<: less than
MCL: Maximum Contaminant Level
MDL: Method Detection Limit
LSPC: result less than lower specification
USPC: result greater than upper specification
TIE: Tentatively Identified or Estimated
>: greater than
z: surrogate

COC Date: Date Chain of Custody Signed
COC Time: Time Chain of Custody Signed

SAMPLE COMMENTS:

COLLECTOR: BRAD BLALOCK

WHERE TAKEN: MONITOR WELL 14

Approved By: 

BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Creosote
 County Code Forrest NPDES Permit No. _____
 Discharge No. _____ Date Requested 12/15/05
 Sample Point Identification MW-19
 Requested By T Russell Data To T Russell
 Type of Sample: Grab () Composite (Flow) (Time) Other ()

II. SAMPLE IDENTIFICATION:
 Environment Condition _____ Collected By B Blalock
 Where Taken Monitor Well 19

Type	Parameters	Preservative	Date	Time
<u>groundwater</u>	<u>Semi-VOCs</u>	<u>Fed</u>	<u>12/14/05</u>	<u>15 45</u>
	<u>VOCs</u>	<u>HL</u>		

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()			
D.O.	(000300)	()			
Temperature	(000010)	()			
Residual Chlorine	(050060)	()			
Flow	(074060)	()			

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other ()

V. LABORATORY: Received By Jerry Sawyer Date 12/15/05 Time 0830
 Recorded By _____ Date Sent to State Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l		*
COD ₅	(000340)	()	mg/l		
TOC	(000680)	()	mg/l		
Suspended Solids	(099000)	()	mg/l		
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/l		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)	(074055)	()	colonies/100 ml		*
Total Phosphorus	(000665)	()	mg/l		
Oil and Grease(1)	(000550)	()	mg/l		
Oil and Grease(2)	(000550)	()	mg/l		
Chlorides	(099016)	()	mg/l		
Phenol	(032730)	()	mg/l		
Total Chromium	(001034)	()	mg/l		
Hex. Chromium	(001032)	()	mg/l		
Zinc	(001092)	()	mg/l		
Copper	(001042)	()	mg/l		
Lead	(017501)	()	mg/l		
Cyanide	(000722)	()	mg/l		
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			
		()			

Remarks _____

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Pollution Control
1542 Old Whitfield Road
Pearl, MS 39208
601-664-3900

COMPLIANCE MONITORING REPORT

To: TONY RUSSELL Sample ID: AA30011 Facility Name: GULF STATES CREOSOTE Sampling Loc: MW 18 Site ID: C0350009 Discharge No: Other No: MW-18 Permit No: Latitude: Longitude: County: 035 FORREST	QA Type: Date Collected: 12/13/2005 Time Collected: 14:00 Sample Collector: BBLALOCK To Lab: SV Sample Type: GROUNDWATER Received By: TAMMY SAWYER LIMS Login Date: 12/15/2005 LIMS Login Time: 08:45 COC Date: 12/15/2005 COC Time: 0830 Project: 3047 Study: COMPLIANCE Reporting Date: 01/09/2006
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ANALYTE	METHOD	RESULT	UNIT	MDL	ANALYST	ANALYSIS	ANALYSIS
						START DATE	END DATE
1,1,1,2-Tetrachloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1,1-Trichloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1,2,2-Tetrachloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1,2-Trichloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1-Dichloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1-Dichloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,1-Dichloropropene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2,3-Trichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2,3-Trichloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2,4-Trichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2,4-Trimethylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2-Dibromo-3-chloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2-Dibromoethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2-Dichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,2-Dichloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05

1,2-Dichloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,3,5-Trimethylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,3-Dichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,3-Dichloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
1,4-Dichlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
2,2-Dichloropropane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
2-Butanone (MEK)	8260W	ND	ug/L	25	BA	12/19/05	12/19/05
2-Chlorotoluene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
2-Hexanone	8260W	ND	ug/L	25	BA	12/19/05	12/19/05
4-Chlorotoluene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
4-Isopropyltoluene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
4-Methyl-2-pentanone (MIBK)	8260W	ND	ug/L	25	BA	12/19/05	12/19/05
Acetone	8260W	ND	ug/L	25	BA	12/19/05	12/19/05
Benzene	8260W	TRACE 1.06	ug/L	5	BA	12/19/05	12/19/05
Bromobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromochloromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromodichloromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromoform	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Bromomethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Carbon Tetrachloride	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Chlorobenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Chloroethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Chloroform	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Chloromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
cis-1,2-Dichloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
cis-1,3-Dichloropropene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Dibromochloromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Dibromomethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Dichlorodifluoromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Ethylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Hexachlorobutadiene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Isopropylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
m & p -Xylene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Methyl tertiary butyl ether	8260W	NA	ug/L	5	BA	12/19/05	12/19/05
Methylene Chloride	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Naphthalene	8260W	38.9	ug/L	5	BA	12/19/05	12/19/05
n-Butylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
n-Propylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
o - Xylene	8260W	TRACE 1.13	ug/L	5	BA	12/19/05	12/19/05
sec-Butylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05

Styrene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
tert-Butylbenzene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Tetrachloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Toluene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
trans-1,2-Dichloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
trans-1,3-dichloropropene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Trichloroethene	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Trichlorofluoromethane	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
Vinyl Chloride	8260W	ND	ug/L	5	BA	12/19/05	12/19/05
z 1,2-Dichloroethane-d4	8260W	97%	ug/L	80-120	BA	12/19/05	12/19/05
z Dibromofluoromethane	8260W	97%	ug/L	80-118	BA	12/19/05	12/19/05
z p-Bromofluorobenzene	8260W	98%	ug/L	80-115	BA	12/19/05	12/19/05
z Toluene-d8	8260W	103%	ug/L	80-118	BA	12/19/05	12/19/05
1,2,4-Trichlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
1,2-Dichlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
1,3-Dichlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
1,4-Dichlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4,5-Trichlorophenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4,6-Trichlorophenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4-Dichlorophenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4-Dimethylphenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,4-Dinitrophenol	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
2,4-Dinitrotoluene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2,6-Dinitrotoluene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Chloronaphthalene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Chlorophenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Methylnaphthalene	8270	TRACE 8.65	ug/L	10.00	JES	12/20/05	1/5/06
2-Methylphenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
2-Nitroaniline	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
2-Nitrophenol	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
3,3'-Dichlorobenzidine	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
3-Nitroaniline	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
4,6-Dinitro-2-methylphenol	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
4-Bromophenyl-phenylether	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
4-Chloro-3-methylphenol	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
4-Chloroaniline	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
4-Chlorophenyl-phenylether	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
4-Methylphenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
4-Nitroaniline	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
4-Nitrophenol	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06

Acenaphthene	8270	10.4	ug/L	10.00	JES	12/20/05	1/5/06
Acenaphthylene	8270	TRACE 1.16	ug/L	10.00	JES	12/20/05	1/5/06
Anthracene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzo[a]anthracene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzo[a]pyrene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzo[b]fluoranthene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzo[g,h,i]perylene	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Benzo[k]fluoranthene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Benzoic Acid	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
Benzyl alcohol	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
bis(2-Chloroethoxy)methane	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
bis(2-Chloroethyl)ether	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
bis(2-chloroisopropyl)ether	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
bis(2-Ethylhexyl)phthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Butylbenzylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Carbazole	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Chrysene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Dibenz[a,h]anthracene	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Dibenzofuran	8270	24.9	ug/L	10.00	JES	12/20/05	1/5/06
Diethylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Dimethylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Di-n-butylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Di-n-octylphthalate	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Fluoranthene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Fluorene	8270	14.6	ug/L	10.00	JES	12/20/05	1/5/06
Hexachlorobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Hexachlorobutadiene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Hexachlorocyclopentadiene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Hexachloroethane	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Indeno[1,2,3-cd]pyrene	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Isophorone	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Naphthalene	8270	140	ug/L	10.00	JES	12/20/05	1/5/06
Nitrobenzene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
N-Nitroso-di-n-propylamine	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
n-Nitrosodiphenylamine	8270	ND	ug/L	20.00	JES	12/20/05	1/5/06
Pentachlorophenol	8270	ND	ug/L	50.00	JES	12/20/05	1/5/06
Phenanthrene	8270	12.4	ug/L	10.00	JES	12/20/05	1/5/06
Phenol	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
Pyrene	8270	ND	ug/L	10.00	JES	12/20/05	1/5/06
z 2,4,6-Tribromophenol	8270	86%	ug/L	10-123	JES	12/20/05	1/5/06

z 2-Fluorobiphenyl	8270	85%	ug/L	43-116	JES	12/20/05	1/5/06
z 2-Fluorophenol	8270	76%	ug/L	21-100	JES	12/20/05	1/5/06
z Nitrobenzene-d5	8270	84%	ug/L	35-114	JES	12/20/05	1/5/06
z Phenol-d5	8270	82%	ug/L	10-194	JES	12/20/05	1/5/06
z Terphenyl-d14	8270	87%	ug/L	33-141	JES	12/20/05	1/5/06

ABBREVIATIONS / DEFINITIONS

ug/L: micrograms/Liter	<: less than	COC Date: Date Chain of Custody Signed
mg/L: milligrams/Liter	MCL: Maximum Contaminant Level	COC Time: Time Chain of Custody Signed
mg/kg:	MDL: Method Detection Limit	
milligrams/kilogram	LSPC: result less than lower specification	
ug/g: micrograms/gram	USPC: result greater than upper specification	
ppm: parts per million	TIE: Tentatively Identified or Estimated	
ppb: parts per billion	>: greater than	
	z: surrogate	

SAMPLE COMMENTS:

ENVIRONMENT CONDITION: 60 DEGREES FAHRENHEIT, SUNNY

COLLECTOR: BRAD BLALOCK

WHERE TAKEN: MONITOR WELL 18

Approved By: 

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No. _____

I. GENERAL INFORMATION: Facility Name Gulf States Creosote
 County Code Forrest NPDES Permit No. _____
 Discharge No. _____ Date Requested 12/15/05
 Sample Point Identification MW-18
 Requested By T Russell Data To T Russell
 Type of Sample: Grab (X) Composite (Flow) (Time) Other () _____

II. SAMPLE IDENTIFICATION:
 Environment Condition 60° Sunny Collected By B. Blatgath
 Where Taken Monitor Well 18 D. Pinegrove
ONN

Type	Parameters	Preservative	Date	Time
1. <u>groundwater</u>	<u>VOCs</u>	<u>HCL</u>	<u>12/12/05</u>	<u>1400</u>
2. _____	<u>Semi-Volcs</u>	<u>Ice</u>	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

III. FIELD:

Analysis	Computer Code	Request	Results	Analyst	Date
pH	(000400)	()	_____	_____	_____
D.O.	(000300)	()	_____	_____	_____
Temperature	(000010)	()	_____	_____	_____
Residual Chlorine	(050060)	()	_____	_____	_____
Flow	(074060)	()	_____	_____	_____

IV. TRANSPORTATION OF SAMPLE: Bus () RO Vehicle () Other (X) OPC Vehicle
V. LABORATORY: Received By Jerry Meyer Date 12/15/05 Time 0831
 Recorded By _____ Date Sent to State/Office _____

Analysis	Computer Code	Request	Result	Analyst	Date Measured
BOD ₅	(000310)	()	mg/l	_____	*
COD ₅	(000340)	()	mg/l	_____	_____
TOC	(000680)	()	mg/l	_____	_____
Suspended Solids	(099000)	()	mg/l	_____	_____
TKN	(000625)	()	mg/l	_____	_____
Ammonia-N	(000610)	()	mg/l	_____	_____
Fecal Coliform(1)	(074055)	()	colonies/100 ml	_____	*
Fecal Coliform(2)	(074055)	()	colonies/100 ml	_____	*
Total Phosphorus	(000665)	()	mg/l	_____	_____
Oil and Grease(1)	(000550)	()	mg/l	_____	_____
Oil and Grease(2)	(000550)	()	mg/l	_____	_____
Chlorides	(099016)	()	mg/l	_____	_____
Phenol	(032730)	()	mg/l	_____	_____
Total Chromium	(001034)	()	mg/l	_____	_____
Hex. Chromium	(001032)	()	mg/l	_____	_____
Zinc	(001092)	()	mg/l	_____	_____
Copper	(001042)	()	mg/l	_____	_____
Lead	(017501)	()	mg/l	_____	_____
Cyanide	(000722)	()	mg/l	_____	_____
_____	()	()	_____	_____	_____
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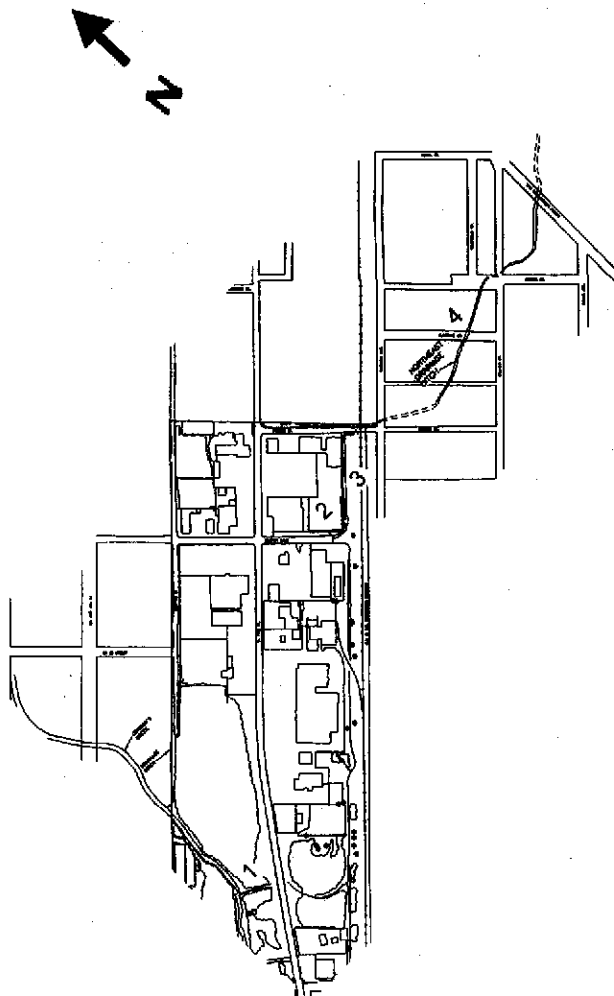
Remarks _____

If you have any additional questions,
please contact:

MISSISSIPPI
Mississippi Department of Environmental Quality
Uncontrolled Sites Section
(601)961-5318

CHRISTOPHER W. BROWN
Mississippi Department of Environmental Quality
Field Services Division
(601)961-5011

KELLY RILEY
Mississippi Department of Environmental Quality
Legal Division
(601)961-5369



Mississippi of ENVIRONMENTAL
Department of QUALITY

PROPOSED CLEANUP PLANS for the former Gulf States Creosote site in Hattiesburg

november 2002

MDEQ

land, and water through fair
and responsible regulation.



P.O. Box 10385
Jackson, MS 39289
www.deq.state.ms.us

The Mississippi Department of Environmental Quality (MDEQ) is publishing this notice to inform the citizens of Hattiesburg and the surrounding area about the proposed cleanup of the former creosote plant located in and around Courtesy Motors on West Pine Street.

The former creosote plant operated from the early 1900's to approximately 1960. Since the plant operated prior to the creation of MDEQ, the agency never regulated this site. In 1962, the site was redeveloped for commercial and light industrial use.

Location 1 (see map on back)

Former Fill Area (between West Pine St. & Gordon's Creek)

Proposed Cleanup: Install sheet-piling wall along the creek bank to eliminate seepage into the creek, install monitoring and recovery wells along the wall to monitor and recover any free product that may collect, install concrete culvert from West Pine Street to Creek, cover the area with a liner, and plant trees to prevent mounding of groundwater along the sheet-piling wall.

Location 2 (see map on back)

Former Process Area (between Scooba St. & Timothy Ln.)

Proposed Cleanup: Remove creosote contaminated soil from the wooden substructure and the concrete sump area, backfill with compacted clay fill material, regrade the surface and cap the area with a liner and asphalt.

Location 3 (see map on back)

Southern Railroad Track Area

Proposed Cleanup: Remove creosote contaminated sediment and soils from within and beneath the drainage ditch. Depending on the effects of the integrity of the railroad tracks, the soils will either be capped in place or removed.

Location 4 (see map on back)

Northeast Ditch from Scooba Street to Katie Street

Proposed Cleanup: Remove contaminated sediment and soils, install a liner and sand bed in the ditch, install culvert and surface drains, and then backfill around culverts with clean soil.

In an effort to address some of your concerns, MDEQ has listed answers to the most frequently asked questions about the proposed cleanup. If you have any other questions, please contact Tony Russell at (601) 961-5318.

Question 1. Has the City's drinking water been contaminated by creosote or other wood treating chemicals?

No. There is no threat to the City of Hattiesburg's drinking water supply, but MDEQ will require monitoring on a semi-annual basis for two years to watch for any possible migration of groundwater contamination. After two years, the monitoring will be performed on an annual basis for an indefinite period of time.

Question 2. Have the citizens or residents in the area been exposed to creosote contamination at the surface?

No. MDEQ is not aware of any direct exposure at this time. The limited amount of contamination that exists is below the surface. Although creosote contamination exists in the drainage ditch that runs from Scooba Street to Katie Street, there is no direct exposure because the contamination has been covered by sediment that has been deposited over time.

Question 3. How does MDEQ know that the shallow groundwater contamination will not impact the City of Hattiesburg's drinking water supply or a private well?

Extensive groundwater monitoring will allow MDEQ to watch the location of the groundwater contamination and ensure that any migration does not threaten drinking water in the area. A private water well search was conducted in October 2000 in the residential area surrounding the site, and no private wells were identified. Also, the City of Hattiesburg has an ordinance that prohibits the drilling of private wells within the city limits.

Question 4. What is the possibility that contamination will continue to migrate in the future?

The remedies proposed should eliminate the possibility for migration in the fill area, process area, and drainage ditch.

Question 5. How long will the remediation take place?

The remedies proposed for the process area and the fill area will be accomplished within one year. The remedy for the northeast drainage ditch may take more than one year due to size of the project and weather conditions.

Question 6. Does MDEQ know if the contaminants have migrated from the site to the soils in the residential yards in the area?

Soil samples have been collected in the residential area, and no contamination was found above the target remediation goal levels established by MDEQ.

Question 7. When the company begins the cleanup of the site, will this create exposure to residents in the area?

No. But there will be odors associated with the removal of contaminated soils from the process area and the Northeast drainage ditch. Citizens will not be exposed to harmful levels of contaminants from the site.

Question 8. What is being done about the creosote in Gordon's Creek?

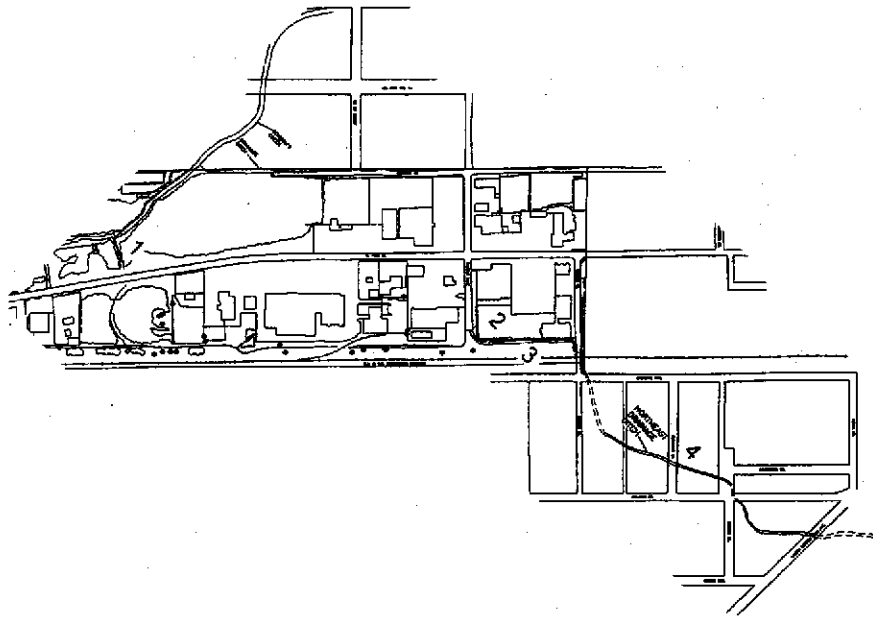
MDEQ knows there are occasional seepages from the old fill area into Gordon's Creek, but an ecological assessment conducted by the Corp of Engineers indicated that there are no environmental impacts to the creek. A sheet-piling barrier wall will be installed to eliminate further discharges to the creek.

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MISSISSIPPI
Mississippi Department of Environmental Quality
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Mississippi
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of ENVIRONMENTAL QUALITY

**PROPOSED
CLEANUP PLANS
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site in Hattiesburg**

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MDEQ

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Former Fill Area (see map on back)

Proposed Cleanup: Install sheet-piling wall along the creek bank to eliminate seepage into the creek, install monitoring and recovery wells along the wall to monitor and recover any free product that may collect. Install concrete culvert from West Pine Street to Creek, cover the area with a liner, and plant trees to prevent mounding of groundwater along the sheet-piling wall.

Former Process Area (see map on back)

Proposed Cleanup: Remove creosote contaminated soil from the wooden substructure and the concrete sump area, backfill with compacted clay fill material, regrade the surface and cap the area with a liner and asphalt.

Southern Railroad Truck Area (see map on back)

Proposed Cleanup: Remove creosote contaminated sediment and soils from within and beneath the drainage ditch. Depending on the effects of the integrity of the railroad tracks, the soils will either be capped in place or removed.

Northeast Ditch from Scooba Street to Katie Street (see map on back)

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No. There is no threat to the City of Hattiesburg's drinking water supply, but MDEQ will require monitoring on a semi-annual basis for two years to watch for any possible migration of groundwater contamination. After two years, the monitoring will be performed on an annual basis for an indefinite period of time.

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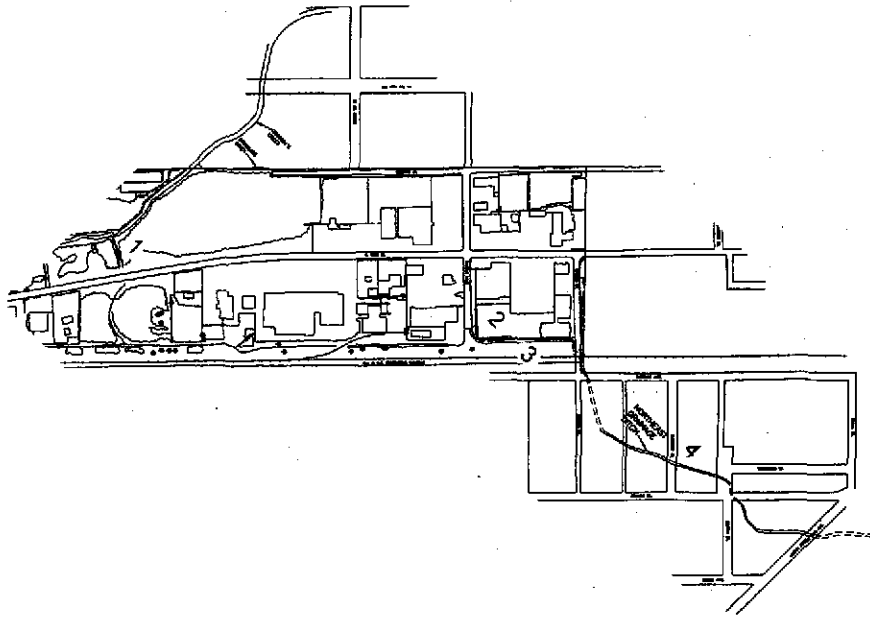
(601)961-5318

Mississippi Department of Environmental Quality
Field Services Division

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Mississippi Department of Environmental Quality
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Proposed Cleanup: Remove creosote contaminated soil from the wooden substructure and the concrete sump area, backfill with compacted clay fill material, regrade the surface and cap the area with a liner and asphalt.

Location 3 (see map on back)

Southern Railroad Truck Area

Proposed Cleanup: Remove creosote contaminated sediment and soils from within and beneath the drainage ditch. Depending on the effects of the integrity of the railroad tracks, the soils will either be capped in place or removed.

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COYI DE VERA

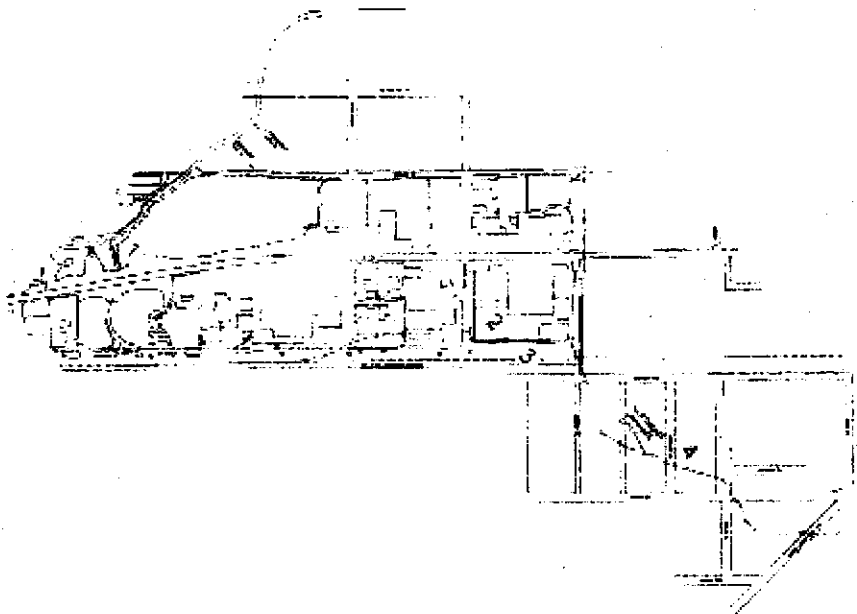
Mississippi Department of Environmental Quality
Assessment and Remediation Branch
(601) 961-5318

GEORGE JAYM

Mississippi Department of Environmental Quality
Field Services Division
(601) 961-5011

KEITH KELLEY

Mississippi Department of Environmental Quality
Legal Division
(601) 961-5369



Mississippi
Department

of ENVIRONMENTAL QUALITY

STATUS OF
CLEANUP ACTIVITY
for the former Gulf
States Creosote
site in Hattiesburg

October 2003

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The former creosote plant operated from the early 1900's to approximately 1960. The contamination at the former Gulf States Creosote site occurred prior to 1960, long before the creation of the Mississippi Department of Environmental Quality. In 1962, the site was redeveloped for commercial and light industrial use.

YELLOW TEXT indicates work completed

Location #1:

Former Fill Area

Proposed Cleanup: Install sheet-piling wall along the creek bank to eliminate seepage into the creek, install monitoring and recovery wells along the wall to monitor and recover any free product that may collect, install concrete culvert from West Pine Street to Creek, cover the area with a liner, and plant trees to prevent mounding of groundwater along the sheet-piling wall.

Location #2:

Former Process Area

Proposed Cleanup: Remove creosote contaminated soil from the wooden substructure and the concrete sump area, backfill with compacted clay fill material, regrade the surface and cap the area with a liner and asphalt.

Location #3:

Southern Railroad Track Area

Proposed Cleanup: Remove creosote contaminated sediment and soils from within and beneath the drainage ditch. Depending on the effects on the integrity of the railroad tracks, the soils will either be capped in place or removed.

Location #4:

Northcast Ditch from Scooba Street to Katie Street

Proposed Cleanup: Remove contaminated sediment and soils, install a liner and sand bed in the ditch, install culvert and surface drains, and then backfill around culverts with clean soil. The drainage ditch project is complete except for replacing the culverts beneath Martin Luther King Avenue, Florence Avenue and Eastside Avenue, and completing inlet boxes, grading and seeding. Additional potential areas of concern along the drainage ditch have been identified and will be assessed and remediated over the next few months as needed.

In an effort to answer your questions, MDEQ has listed answers to the most frequently asked questions about the status of the cleanup. If you have any other questions, please contact Tony Russell at (601) 961-5318.

Question 1. Will the City's drinking water be contaminated by the contamination in the shallow water table?

No. There is approximately 150 to 200 feet of Hattiesburg Clay between the contaminated shallow water table and drinking water. The City of Hattiesburg's wells are screened in the Catahoula Formation. The Catahoula Formation is a geologic formation, approximately 660 feet thick, that extends from 530 feet to 1190 feet below ground surface, from which the City of Hattiesburg obtains its drinking water.

Question 2. Is the soil that is stockpiled along the drainage ditch contaminated? No. This soil came from either clean areas of the drainage ditch or from areas outside the drainage ditch pathway and will be used for backfill. When installing the larger



drainage pipe, a lot of excess soil was generated from the excavations. This non-contaminated soil was stockpiled until needed for backfill.

Question 3. What happened to the excavated contaminated soil from the drainage ditch?

All the contaminated soil was loaded directly into trucks for disposal and sent to permitted landfills. Each truck that leaves the site is covered to

further insure that soil is not spilled enroute to the landfill.

Question 4. Is dust a concern? The Health and Safety Plan requires that the dust be controlled. The only dust noticed during the unannounced site inspections was on Martin Luther King Drive where vehicle traffic was stirring up dust. The dust is generated from truck traffic across the non-contaminated soil that is being brought in as backfill material. The soil excavated from the ditch is moist and is being loaded directly into covered trucks for disposal. Even though the dust is from non-contaminated soil, the area is being sprayed with water from the City's potable water supply system to minimize the nuisance effect caused by the dust.

Question 5. Is air pollution a concern?

No. The air is being monitored as required in the Health and Safety Plan for both the process area and the drainage ditch removal projects. There are both stationary and mobile units being used for monitoring purposes. The readings are being documented on a daily basis and recorded in a permanent file as required in the Health and Safety Plan. There are odors associated with the creosote as it is removed, but none of the permissible exposure limits for the creosote compounds have been exceeded in the work zone. Therefore, although workers and residents may smell the creosote as it is excavated, there is no associated health risk because the air is being closely monitored.



If you have any additional questions,
please contact:

FRANK REYNOLDS

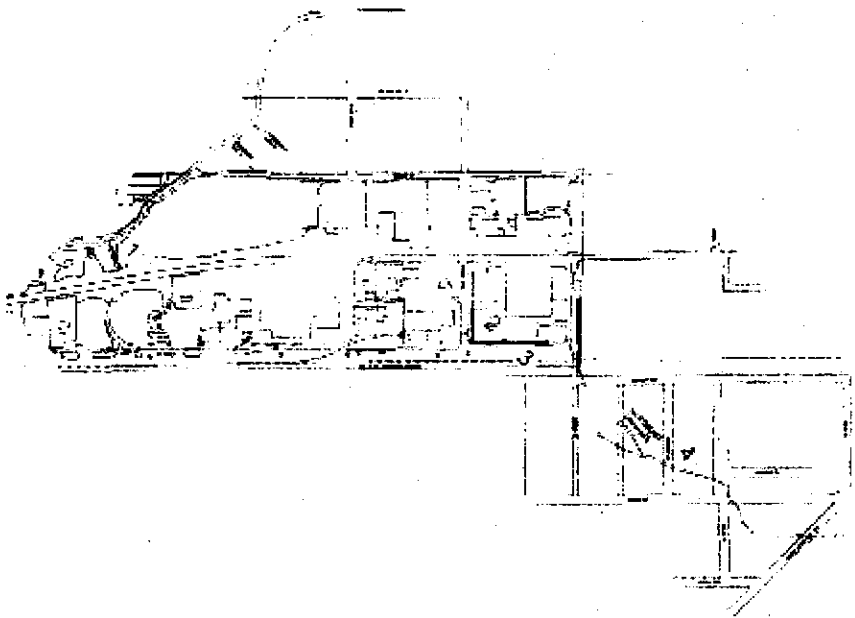
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Location #4:

Northeast Ditch from Scooba Street to Katie Street
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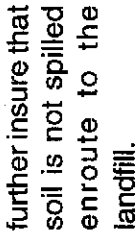
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Question 4. Is dust a concern? The Health and Safety Plan requires that the dust be controlled. The only dust noticed during the unannounced site inspections was on Martin Luther King Drive where vehicle traffic was stirring up dust. The dust is generated from truck traffic across the non-contaminated soil that is being brought in as backfill material. The soil excavated from the ditch is moist and is being loaded directly into covered trucks for disposal. Even though the dust is from non-contaminated soil, the area is being sprayed with water from the City's potable water supply system to minimize the nuisance effect caused by the dust.

Question 1. Will the City's drinking water be contaminated by the contamination in the shallow water table? No. There is approximately 150 to 200 feet of Hattiesburg Clay between the contaminated shallow water table and drinking water. The City of Hattiesburg's wells are screened in the Catahoula Formation. The Catahoula Formation is a geologic formation, approximately 660 feet thick, that extends from 530 feet to 1190 feet below ground surface, from which the City of Hattiesburg obtains its drinking water.

Question 2. Is the soil that is stockpiled along the drainage ditch contaminated? No. This soil came from either clean areas of the drainage ditch or from areas outside the drainage ditch pathway and will be used for backfill. When installing the larger drainage pipe, a lot of excess soil was generated from the excavations. This non-contaminated soil was stockpiled until needed for backfill.

Question 3. What happened to the excavated contaminated soil from the drainage ditch? All the contaminated soil was loaded directly into trucks for disposal and sent to permitted landfills. Each truck that leaves the site is covered to



Question 5. Is air pollution a concern? No. The air is being monitored as required in the Health and Safety Plan for both the process area and the drainage ditch removal projects. There are both stationary and mobile units being used for monitoring purposes. The readings are being documented on a daily basis and recorded in a permanent file as required in the Health and Safety Plan. There are odors associated with the creosote as it is removed, but none of the permissible exposure limits for the creosote compounds have been exceeded in the work zone. Therefore, although workers and residents may smell the creosote as it is excavated, there is no associated health risk because the air is being closely monitored.

**THIS FILE IS
CLOSED**

ENCLOSED DATED MATERIAL

From: Nov 17, 2005
To: FEB 9, 2007

**MORE RECENT MATERIAL
IN OTHER FILE**



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

FILE COPY

February 9, 2007

Mayor Johnny L. Dupree
City of Hattiesburg
P. O. Box 1898
Hattiesburg, MS 39403-1898

Re: Gulf States Creosote Site
Groundwater Sampling Reports
Hattiesburg, Mississippi

Dear Mayor Dupree:

Please find attached a copy of the December 2005 Annual Groundwater Monitoring Report for the old Gulf States Creosote site located on West Pine Street in Hattiesburg. Per your request the 2006 Annual Groundwater Monitoring Report will be submitted as soon as we receive it; the report is due around April 1, 2007. All subsequent annual reports will also be submitted upon receipt in our office.

Please feel free to call me at 601-961-5318 if you have any further questions concerning this matter.

Sincerely,

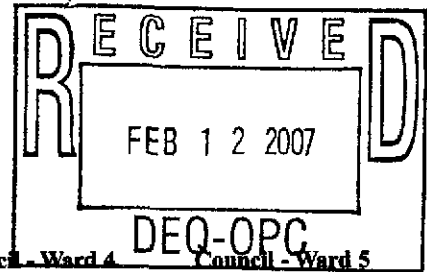
A handwritten signature in black ink, appearing to read "Tony Russell".

Tony Russell, Chief
Assessment Remediation Branch



Mayor

Johnny L. DuPree, Ph.D.



Council - Ward 1

Kim Bradley

Council - Ward 2

Deborah Denard Delgado

Council - Ward 3

Carter Carroll

Council - Ward 4

Dave J. Ware, II

Council - Ward 5

Henry Naylor

February 8, 2007

Mr. Tony Russell
Mississippi Department of Environmental Quality
Ground Water Assessment and Remediation Division
P.O. Box 20305
Jackson, MS 39289-1305

RE: Gulf State Creosote Monitoring Reports

Dear Mr. Russell:

As you discussed with Franklyn Tate, please provide the City of Hattiesburg with a copy of the monitoring reports for the Gulf State Creosote site. It is my understanding that you have a report dated December 2005, and there is another report due on April 1, 2007. Please immediately provide the December 2005 report, and submit the report due in April once it is made final. Further, the City would like to receive all future final monitoring reports relative to this site. Thank you in advance for your help, and should you have questions, please contact Franklyn Tate at (601) 545-4541.

Sincerely,

Johnny L. DuPree, Ph.D.
Mayor, City of Hattiesburg

JLD/kmh

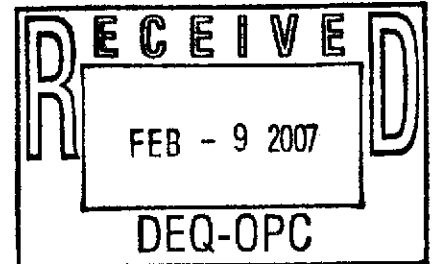
TRONOX

Name: A. Keith Watson
Title: Project Manager

Phone: (405) 775-5475
Fax: (405) 775-6563
e-mail: Keith.Watson@Tronox.com

February 5, 2007 ^{7/AM}

Tony Russell, Chief
Mississippi Department of Environmental Quality
Assessment Remediation Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385



Re: Gulf States Creosote Site
Northeast Drainage Ditch Project
Hattiesburg, Mississippi

Dear Mr. Russell:

Pursuant to the request of the Mississippi Department of Environmental Quality in the letter dated December 21, 2004, Tronox LLC is providing this updated status report regarding access to those parcels of land that may require further attention pursuant to the MDEQ-approved Work Plan for the Northeast Drainage Ditch.

The Woods property. Tronox and Mrs. Woods have successfully completed the access agreement. Mrs. Woods is moving and has until April 12, 2007 to vacate the property. This will be the last access report on this property.

The Norfolk Southern Railroad (NSRR) right-of-way. In light of the MDEQ decision on the risk assessment methodology provided in an email of 2/21/06, Tronox may need to modify the remedial design for this property. We are currently evaluating options and will soon discuss these with MDEQ. Then, Tronox and NSRR can intelligently discuss access requirements.

We appreciate your attention and assistance towards completion of the Northeast Drainage Ditch Work Plan. If you have any questions or comments, please call me at (405) 775-5475.

Sincerely,

A handwritten signature in cursive script that reads "Keith Watson".

A. Keith Watson
Project Manager

Copy: N. Bock
M. Cunningham/E. Hurst



CONNER ANALYTICAL TESTING COMPANY

2703 OAK GROVE ROAD, HATTIESBURG, MS 39402
PHONE: (601) 264-2854 FAX: (601) 268-7084

<http://www.batco.com>

<mailto://batco@batco.com>

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100-040

January 10, 2007

Mr. Tony Russell
Office of Pollution Control
Mississippi Department of Environmental Quality
101 West Capital Street
Jackson, MS 39201

Re: Gulf States Creosote Site/ John Fairchild Property/ Site Investigation Plan

Dear Mr. Russell:

We have been retained by Mr. John Fairchild, owner of a 5.5 acre parcel of land on the Gulf States Creosote site in Hattiesburg, Mississippi. The property is bounded on the north by West Pine Street; on the south by Southern Railroad track; on the east by the former Strahan Auto Sales; and on the west by Craft Auto Sales.

Mr. Fairchild would like to develop the property for use as a parking lot for the neighboring car dealership. This will involve applying either an asphalt or concrete cap over the property.

The property has previously been cleared and grubbed under a work plan developed by ICON Environmental Solutions, LLC and approved by your office, dated March 24, 2003.

We propose to complete the scope of work outlined in that plan approved by MDEQ with two modifications.

1. The original work plan addressed only the east part of the property between Strahan Auto Sales and the stream bed. This investigation will include the entirety of parcel 5 from Craft Auto to Strahan Auto Sales, which is about 5.5 acres more or less.

2. The original work plan called for collecting five 10 foot core samples and screening each with an Organic Vapor Analyzer (OVA). The area of each core sample having the highest OVA reading would be taken for analysis. This investigation will increase the number of sample cores to twenty 2 foot cores space on 100 foot centers. Each core will be segmented and analyzed so that there will be a zero to one foot sample and a one to two foot sample. Each sample will be analyzed by EPA method 8310 for Polynuclear Aromatic Hydrocarbons (PAH).

In the event that all analytical data are below the MDEQ Target Remediation Goals (TRG) for unrestricted use, Mr. Fairchild requests a No Further Action letter from your office.

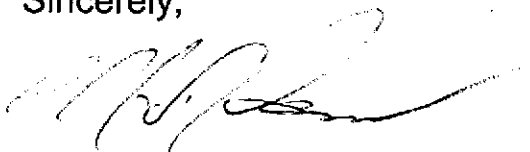
In the event that analytical data shows the presence of PAH compounds that exceed the TRG for unrestricted use, but are below the restricted use limits, Mr. Fairchild requests a No Further Action letter with the appropriate deed restriction.

In the event that PAH compounds are detected at levels exceeding the restricted use levels additional investigation will be performed to delineate the length, width and depth of contamination, as required by your office in order to effectively remediate the site.

We plan to complete this investigation within six weeks of your authorization to go forward.

Following your review, if these modifications of the work order meets your approval please advise me so that we can go forward.

Sincerely,



Michael S. Bonner, Ph.D. CEO



FILE COPY

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

January 30, 2007

Mr. Keith Watson
Tronox LLC
P. O. Box 268859
Oklahoma City, OK 73126-8859

Re: Gulf States Creosote Site
Summary of 2005 DNAPL Recovery Activities – Gordon's Creek Fill Area
dated December 14, 2006
Hattiesburg, Mississippi

Dear Mr. Watson:

The Mississippi Department of Environmental Quality has reviewed the above referenced report for the Fill Area prepared by Michael Pisani & Associates. MDEQ concurs with the proposal to gauge and recover DNAPLs on a quarterly basis. MDEQ was not notified of the quarterly events for 2006. MDEQ requires the following:

1. The report summarizing the 2006 recovery activities be submitted by March 1, 2007.
2. All future annual recover activity reports be submitted by March 1 of the following year; for example the 2007 report is due by March 1, 2008.
3. That MDEQ be notified a minimum of two (2) weeks prior to conducting the quarterly gauging/recovery field event.

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

Sincerely,

Tony Russell, Chief
Assessment Remediation Branch

cc: Dave Upthegrove Michael Pisani & Associates [EMAIL ONLY]

Mr. Keith Watson
January 30, 2007
Page 2

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

Sincerely,



Tony Russell, Chief
Assessment Remediation Branch

cc: Dave Upthegrove Michael Pisani & Associates [EMAIL ONLY]



FILE COPY

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

January 30, 2007

Mr. Keith Watson
Tronox LLC
P. O. Box 268859
Oklahoma City, OK 73126-8859

Re: Gulf States Creosote Site
2005 Ground Water Monitoring Report dated December 14, 2006
Hattiesburg, Mississippi

Dear Mr. Watson:

The Mississippi Department of Environmental Quality has reviewed the above referenced report prepared by Michael Pisani & Associates. The review generated the following comments/concerns:

1. The report did not contain a plume map. Future reports must contain a plume map showing the extent of contamination detected in the monitoring wells.
2. MDEQ does not concur with the proposal to eliminate the damaged well MW-9 from the annual sampling events. MDEQ requires that either MW-9 be repaired or replaced. This well is the most down gradient well within the plume and is needed to monitor the degradation rate.
3. MDEQ requires that MW-13 be abandoned when MW-9 is either repaired or replaced. MDEQ had previously approved the abandonment of this well. MDEQ can provide assistance in obtaining access for abandonment.
4. All future annual monitoring reports are due by April 1 of the following year; for example, the 2006 annual report is due by April 1, 2007.

MDEQ has not received the January 2007 monthly status report concerning access issues. Please continue to provide monthly updates on access issues until all access agreements have been finalized. Please provide a written response to these concerns by February 9, 2007.



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

MEMORANDUM

TO: Gulf States Creosote Site File
Hattiesburg, MS
FROM: Tony Russell *TRR 1/12/07*
DATE: January 12, 2007
SUBJECT: Annual Sampling Event Jan 10, 2007

I met with Brad Blalock (Michael Pisanti & Associates) on January 10, 2007, to observe and collect split sample during the annual groundwater sampling event. The wells were purged using the slow purge method with a variable speed peristaltic pump. The stabilization parameters were collected using a flow through cell. Once the parameters were stable, the samples were collected using the peristaltic pump.

I collected a split on monitor well 19. The sample will be analyzed for PAHs at the OPC lab in Pearl, MS.

No photos were taken during this sampling event.

K:\Common\UCSS\Tony\Gulf States Creosote\GSC annual GW sampling event 1-10-07.doc

Invoice

Invoice Number:

Date: January 10, 2007

OFFICE OF POLLUTION CONTROL
 LABORATORY
 1542 Old Whitfield Road
 PEARL, MS 39208
 PHONE: (601) 664-3900

To:

DEPARTMENT OF ENVIRONMENTAL QUALITY
 UNCONTROLLED SITES SECTION VOLUNTARY
 EVALUATION PROGRAM
 P. O. BOX 10385
 JACKSON, MS 39289

Ship to (if different address):

DEPARTMENT OF ENVIRONMENTAL QUALITY
 UNCONTROLLED SITES SECTION
 VOLUNTARY EVALUATION PROGRAM
 2380 HWY 80 WEST
 JACKSON, MS 39204

<input type="checkbox"/> QTY.	<input type="checkbox"/> DESCRIPTION	<input type="checkbox"/> UNIT PRICE	<input type="checkbox"/> TOTAL
1	<input type="checkbox"/> SVOA SAMPLE ANALYZED, Gulf States Creosote Sample Number 32394; VEP #40470048	\$425.00	\$425.00
Subtotal (Sheet Total)			\$425.00

Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Sunday, September 03, 2006 6:09 PM
To: Coalter, Kim (Cochran)
Cc: 'Beban, Paul'
Subject: Emailing: article

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'We struggle every year to remain open'

By Rachel Leifer

Each year, South Mississippi Children's Center Director Tammy Miller works on her

"We generally struggle every year to remain open," she said.

▼ ADVERTISEMENT ▼ It's a common state of affairs for nonprofit child welfare organization a fragile combination of state, federal and local resources. But giving is discretionary and Miller often finds herself relying on the charity of individuals, other nonprofits and

Not knowing how much money will be available from year to year makes budgeting

The center's fiscal 2007 budget proposal is \$548,950, with \$97,196 coming from the Forrester and Lamar, it serves.

"It's important that, since not one entity or funding source can totally fund the shelter Christopher Cherney, chief executive officer of Mississippi Children's Home Services Jackson that oversees the South Mississippi Children's Center and 10 other shelters

"Some boards of supervisors are more generous ... and others have not picked up



It isn't news that child welfare agencies in Mississippi face chronic budget shortfalls garnered national attention for being dangerously underfunded and understaffed.

Life is often grim for the roughly 3,500 children in the custody of the state Department of Children's Services. Children's Rights, a national child advocacy group based in Nashville, the state alleging repeated violations of children's rights, gross mismanagement and a trial pending a federal judge's ruling on summary judgments from both sides - and developed a program improvement plan and "blueprint for success" to measure its

In what can be a chaotic child welfare system, Mississippi Children's Home Services is out by many accounts as clean, safe places where children receive much needed

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"Their role is absolutely vital," said Michael Forster, professor of social work and director of the Center for Child Welfare at the University of Southern Mississippi.

"The shelter here in town is the kind of place Department of Human Services work there are no emergency foster homes available. (The shelter) is professionally staffed and does without that kind of service - it often prevents disasters from occurring."

Not adding up

Despite their crucial contribution to protecting the state's least fortunate children, the Hattiesburg Children's Home Services' coffers. The Hattiesburg shelter, which serves about 17 area counties, receives \$55 per child per day from the state Department of Human Services. The shelter also receives about \$139 per day to feed, clothe, counsel and care for each child, Miller said.

Those lopsided figures stem from state policy, Forster said.

"A few states ... require on paper that 100 percent of the reasonable cost of care be covered by the state of Mississippi," he said.

"Mississippi contracts for what (the Department of Human Services) feels it can afford to make up the difference. It clearly is a hindrance to fully developing the system, and the services we could be developing."

To supplement the Department of Human Services' contribution, the Hattiesburg's United Way agency. It is also reimbursed \$13,000 per year from the state Department of Human Services for the services it provides its charges.

But supplemental state and federal grants needed to make ends meet require local government donations.

So Miller is seeking more help from the counties the shelter serves.

Whose responsibility?

Since more than half of the children that cross the shelter's threshold come from the counties, the state supervisors for a \$20,000 commitment for the coming year, up from the \$2,531 the state provides.

Miller approached the supervisors too late, board President Billy Hudson said.

Hudson knows well the shelter's importance to the community and the high quality of care provided. He just completed a proposed budget that reduced taxes through controlled spending on certain charities including South Mississippi Children's Center.

"There are so many good causes and if we give everyone what they want it would be better to prefer to leave it to individuals to donate to the charities of their choice rather than to the state."

The supervisors voted to keep their donation at \$2,531 for the coming year.

While counties can make donations to certain types of charitable organizations at the state level, they do not provide and maintain a Department of Human Services building. Forrest County's is providing, Hudson said.

Hattiesburg Mayor Johnny DuPree said the city does not give to the South Mississippi Children's Home Services function.

Local support for arms of Mississippi Children's Home Services varies widely. Miller

County Children's Shelter in Vicksburg, which is funded primarily through a proper supervisors. The levy raises \$265,000 per year that goes directly to the shelter - at roughly 49,000 residents.

Short-shrifted

Miller's budget includes about \$42,000 in contributions from boards of supervisors groups have been very generous in donating supplies and funds, she said. But she shelter will likely have to be bailed out by its parent agency.

Such an outcome would be nothing new, Cherney said.

"Every year from 2001 to the present, South Mississippi Children's Center has run compensates for such shortfalls by transferring funds from other branches with bur into its endowment.

"Last year the deficit was \$70,000 that we had to cover. The year before that it wa:

Forster said it is the ideology of the times to minimize public commitment to social and individuals to address community needs.

"However one comes down philosophically, the reality always seems to work out ti shrifted," he said.

"If the public sector doesn't look out for them, no one is going to."

Originally published September 3, 2006

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Neighborhood raises its voice

By Reuben Mees

It's been six weeks since a group of about 18 Irene's Chapel residents showed up at Hattiesburg City Hall demanding that their neighborhood get some much-needed attention.

The following day, city trucks, police officers, firefighters and code enforcement officers showed up en masse to demonstrate to the residents that their concerns weren't falling on deaf ears.

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The residents brought forward a list of concerns that included an algae-covered stagnant drainage ditch, poor street conditions, lax enforcement (or sometimes none) of city codes and speeding on neighborhood streets.

Some residents are concerned that as time goes by, their elected leaders' attention will fade.

"They came down and had their little show for the camera, but now it seems like it's back to the same thing," said David Rankin, a 34-

year-old graduate student who organized the group that came before City Council on July 5.

But that's not the case, city officials say.

"We are keeping all of our communities in mind," Mayor Johnny DuPree said. "We wanted to make sure we heard their concerns, so we had a concerted effort. But we are doing other things to keep in sight the other concerns as it relates to speeding and code violations."

Fixing the bumpy and rockmarked roads is the first priority, the mayor and Public Services Director Don Sellers said.

WASHINGTON, DC 20510-2402

Warren Paving has been awarded a nearly \$200,000 contract to pave every street between Edwards Street and Rouse Road, Sellers said. The project should be completed within weeks.

The streets are being patched to prepare for that, but sometimes those patches are adding to neighbors' frustrations.

Vinna Perkins, 24, of McCall Street, pointed to a freshly patched spot on her street Thursday and said that a small patch does little to solve the problem.

"These streets are hell on your car, but that doesn't help," she said.

And while the mother of four welcomes street resurfacing, she said the city needs to follow up with appropriate speed limit and "children at play" signs to curb speeding and make it safe for young children to play outside.

Perkins' children play in the backyard because of the speeding along McCall Street.

But some families in the community - those nearest the murky drainage ditch that runs east from McCall Street - have to keep their children in the front yard.

"We can't let our boys play out back because of the mosquitoes," said Freddie McDuffie, who lives between the ditch and Alder Lane.

The drainage situation that causes stagnant water to back up into the neighborhood is scheduled to be remediated by spring of next year, Sellers said. The drainage pipe project would cost \$200,000 and is proposed in the city's annual budget.

The muck-filled ditch and patchy streets aren't the only concerns of Irene's Chapel residents. Freddie McDuffie and his wife Sandra said the community also lacks any sort of recreational activities for youths in the neighborhood.

"There are no sidewalks or playgrounds so our kids have to play basketball in the streets," Freddie McDuffie said.

"If we want to do something as a community we have to go down to Palmer's Crossing to the community center there," Sandra McDuffie said.

"I want our neighborhood looking like any other neighborhood. I know we're poor people, but we don't want to be living like dogs either."

Just across the street from the McDuffies' residence is a heavily wooded area. At first glance, no one would think it was anything more than an overgrown lot, Rankin said.

But down a short lane is an abandoned house with no doors or windows - an open invitation to animals or humans and a clear violation of the city's land codes.

DuPree said that identifying problems such as that vacant house is what the

July 6 response to the neighborhood was intended to accomplish.

United States Senate

"We are following up on issues that we identified that day although some of these things take some time," he said.

Several residents also complained that the city has not been maintaining the ditches along public roads, which are overgrown with weeds.

"At least when we were part of the county, they would come and mow down the ditches," said Bessie Moore, a 33-year-resident of the community. Irene's Chapel was part of the 1991 annexation that included Palmer's Crossing. "Since we're in the city limits, how come they don't fix it like we're part of the city?"

Sellers said his crews have been hampered in their efforts to keep city right-of-ways trimmed by the need to remove debris left over by Hurricane Katrina. But he said the arrival of two new tractors, which is expected to occur within weeks, could alleviate many of those problems.

Rankin said that while he will wait to see how the city's follow-through is, he has been disappointed by Ward 5 Councilman Henry Naylor's response to the area's concerns.

"I don't see him being visible enough in the neighborhood," Rankin said. "He's in the area, but I don't see him. I just don't feel like we've gotten the representation we deserve."

"A lot of my work is behind the scenes," Naylor said explaining that he worked with DuPree and Sellers in devising the plan to address the streets and drainage.

"At the same time, if constituents feel I am not as visible, perhaps it is an area I need to improve on. The bottom line is about trying to get results."

But Naylor said he sees the residents' actions as a first step in correcting problems that will take years to fully address.

"We have got a lot more attention in Irene's Chapel and Palmer's Crossing in the near future," he said. "That's a start, I think we just need to keep that attention there."

"I applaud the group in Irene's Chapel for coming forward," Naylor said. "Hopefully that can serve as a model for other groups who want to come forward in the future."

Originally published August 18, 2006

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THAD COCHRAN
MISSISSIPPI

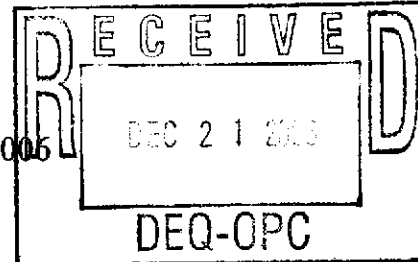
United States Senate

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ADMINISTRATION



December 19, 2006

Please reply to:
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125
(601) 965-4459
(601) 965-4919 Telefax

Mr. Jerry Banks
Chief Groundwater Assessment and Remediation Division
Mississippi Dept. of Environmental Quality
Office of Geology
Post Office Box 20307
Jackson, Mississippi 39289-1307

Dear Mr. Banks:

Enclosed is the information you discussed with Kim Coalter, staff member in my Jackson office. As a courtesy to me, I would appreciate a written response at your earliest convenience.

If you have any question, please call Kim at 601-965-4459. Any assistance you can provide this matter would be deeply appreciated.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Enclosure

December 5, 2006

Please reply to:
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125
(601) 965-4459
(601) 965-4919 Telefax

Mr. Charles H. Chisolm
Executive Director
Mississippi Dept. of Environmental Quality
Office of Geology
Post Office Box 20307
Jackson, Mississippi 39289-1307

Dear Mr. Chisolm:

Enclosed is a response from Department of Justice officials regarding the Forrest County Environmental Support Team. You will see they advised that your agency is the best to deal with the Team's concerns.

I have contacted you regarding this case before. If you have questions or need further information from me, please call Kim Coalter in my Jackson office at 601-965-4459. She is very familiar with this situation and will be happy to speak with you. Kim will be leaving for Christmas vacation soon, so please call her by the end of this week if you need her assistance.

As a courtesy to me, I would appreciate a written response at your earliest convenience. Any assistance you can provide in this matter would be deeply appreciated. I hope you have a wonderful holiday season.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Enclosure



U.S. Department of Justice

Office of Legislative Affairs

Assistant Attorney General

Washington, D.C. 20530

November 15, 2006

The Honorable Thad Cochran
United States Senator
188 East Capitol Street, Suite 614
Jackson, MS 39201-2125

Dear Senator Cochran:

This responds to your letter of September 18, 2006, concerning creosote contamination at the Gulf States Site located in Hattiesburg, Mississippi (creosote site) and the interest of the Forrest County Environmental Support Team in this matter.

The Environment and Natural Resources Division at the U.S. Department of Justice is responsible for, among other things, enforcing the federal environmental laws by means of cases referred to it by various federal agencies. We have given your letter and the attached materials to the Environment Division for its review. The Environment Division has had no involvement with respect to the creosote site. Its review of the information your office provided to this Department revealed that the U.S. Environmental Protection Agency (EPA) has evaluated the creosote site and determined that it did not qualify for federal action under the Superfund law, and should be addressed by the Mississippi Department of Environmental Quality (MDEQ).

EPA has confirmed to the Environment Division that MDEQ remains the agency that has primary responsibility for the creosote site. Under these circumstances, the Department of Justice is not in a position to evaluate the nature of the cleanup that is taking place or determine whether there have been violations of federal environmental laws.

If we can be of further assistance on this or any other matter, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script that reads "James H. Clinger".

James H. Clinger
Acting Assistant Attorney General

September 18, 2006

Please reply to:
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125
(601) 965-4459
(601) 965-4919 Telefax

The Honorable William E. Moschella
Assistant Attorney General
United States Department of Justice
Office of Legislative Affairs
Main Justice Building, Room 1145
950 Pennsylvania Avenue, NW
Washington, D. C. 20530

Dear Mr. Moschella:

Enclosed are correspondence, articles and notes concerning the Forrest County Environmental Support team. It is in order with the most recent information's being on the top, and the least recent on the bottom. As you will see, this matter involves what has been called "environmental racism." As a courtesy to me, I would appreciate a written response at your earliest convenience.

I realize this is a great deal of paperwork. If you have any questions, please contact Kim Coalter in my Jackson, Mississippi, office at 601-965-4459. She has been in regular contact with these constituents, has met with them and, thus, is quite familiar with this situation. She will be happy to speak with you.

Any assistance you can provide in this matter would be deeply appreciated.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Enclosure

September 18, 2006
Page 2

Activity Id: 307071
Assigned To: kc
File Location: 6242jrm001
t:\personal\kc\Q71422.wpd

September 15, 2006

Mr. Sherri Jones
Organizer
Forrest County Environmental Support Team
Post Office Box 374
Hattiesburg, Mississippi 39403

Dear Mr. Jones:

As per your conversations with Kim Coalter in my Jackson office, I am forwarding the concerns of the Forrest County Environmental Support Team to Department of Justice officials. As soon as I receive a response from them, I will be back in touch with you.

Sincerely,

THAD COCHRAN
United States Senator

TC

Activity Id: 307069
Assigned To: kc
File Location: 6242jrm001
t:\personal\kc\Q71425.wpd

Coalter, Kim (Cochran)

From: Coalter, Kim (Cochran)
Sent: Wednesday, September 06, 2006 12:57 PM
To: Sherri jones; David Rankin; 'Marcia Starks'
Subject: One more thing...

I did talk to Rep. Watson yesterday and apprised him of what we are doing on the case.

Kim Coalter
Office of Senator Thad Cochran
601-965-4459

Coalter, Kim (Cochran)

From: Rooks-Jackson, Barbara (Cochran)
Sent: Wednesday, September 06, 2006 11:46 AM
To: Coalter, Kim (Cochran)
Subject: RE: your case

Thanks, Kim, for keeping me apprised on this. Good luck.
BRJ

From: Coalter, Kim (Cochran)
Sent: Wednesday, September 06, 2006 11:07 AM
To: Sherri jones; David Rankin; 'Marcia Starks'
Cc: Rooks-Jackson, Barbara (Cochran); Liddell, James (Cochran)
Subject: your case

Hi! I wrote my report, and our Chief of Staff agreed that since this is a private company, there is little we can do. However, he asked that I run everything by our contacts at Department of Justice, and I will do so. I'll keep you posted, as always.

Kim Coalter
Office of Senator Thad Cochran
601-965-4459

Cc: Liddell, James (Cochran); Davis, Brad (Cochran)
Subject: RE: report and request for input

Well, since this appears to be a legal matter involving a private company and given the fact that you have already contacted DEQ and EPA, I can't think to anything further that you can or should do other than possibly asking for a response from the Dept. of Justice as to the rights of the affected individuals.

From: Coalter, Kim (Cochran)
Sent: Tuesday, September 05, 2006 1:38 PM
To: Keenum, Mark (Cochran); Rooks-Jackson, Barbara (Cochran); Sullivan, Doug (Cochran); Johnson, Rachelle (Cochran)
Cc: Liddell, James (Cochran)
Subject: RE: report and request for input

Kerr McGee, I believe.

From: Keenum, Mark (Cochran)
Sent: Tuesday, September 05, 2006 11:50 AM
To: Coalter, Kim (Cochran); Rooks-Jackson, Barbara (Cochran); Sullivan, Doug (Cochran); Johnson, Rachelle (Cochran)
Cc: Liddell, James (Cochran)
Subject: RE: report and request for input

Who did this group file a lawsuit against?

From: Coalter, Kim (Cochran)
Sent: Tuesday, September 05, 2006 12:16 PM
To: Rooks-Jackson, Barbara (Cochran); Sullivan, Doug (Cochran); Keenum, Mark (Cochran); Johnson, Rachelle (Cochran)
Cc: Liddell, James (Cochran)
Subject: report and request for input

James Liddell and I traveled to Hattiesburg on 8-29-06 to meet with members of the Forest County Environmental Support Team. I have been corresponding with these folks by phone, email and mail for months. They feel that they are being subjected to what I call environmental racism. The short of it is that there was once a plant that operated in their area. It's been closed for about 40 years. (It was taken over by a company named Kerr McGee, and is about to be purchased by another company.) As a result of the operations of the plant, there is, supposedly, about two feet of creosote left in the soil. According to the residents with whom we met, there have been quite a few incidents of cancer as a result of the creosote. They are saying that clean up was done in the nicer area of town but not in theirs.

They showed us other plants in the area that have also operated with creosote production and supposedly haven't cleaned up well. I have done congressional inquiries into this matter with Dept. of Environmental Quality and Environmental Protection Agency officials. Both agencies report that they have done all they can. The Mayor of Hattiesburg, of course, has been dealing with this group as well. He says that he has asked them to provide health records, and they had not as of last week. They filed a lawsuit, and their lawyer worked out a settlement, but it was only for \$400.00 per citizen, and they were not happy with that. They are now bringing that lawyer up before the MS Bar Association, as she ended up receiving a hefty fee while only bringing them a small settlement.

I feel for this group. I believe that something may be amiss, but it's more a private legal matter, and I don't see what we can do..?? They are angry and want compensation. Is this something we have any jurisdiction over at all, or do I need to step back? They are extremely persistent, but I have made sure they understand that I cannot and will not promise them anything at this point. Please advise. Thanks!

Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, August 31, 2006 11:36 PM
To: Coalter, Kim (Cochran); bigwoods44@bellsouth.net
Cc: jordan6195@bellsouth.net; REEDRCMOMS@aol.com; 'Scott Tyner'
Subject: RE: our meeting

Thanks kim

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

From: Coalter, Kim (Cochran) [mailto:Kim_Coalter@cochran.senate.gov]
Sent: Thursday, August 31, 2006 2:42 PM
To: Sherri jones; Marcia Starks; David Rankin
Cc: Rooks-Jackson, Barbara (Cochran); Liddell, James (Cochran)
Subject: our meeting

Hello, everyone. James and I enjoyed meeting with you this week. It was a meaningful visit for us – especially the gathering at the church. We were moved by the testimonies of the citizens. We have discussed this with our Director of Constituent Services, Barbara Rooks-Jackson, and will talk with the appropriate staff members on our D.C. office as well. I want to stress that the congressional inquiry done in your behalf with DEQ and EPA follow the normal route of services we provide. As the plant is owned by a private company, we don't have jurisdiction, as this is a private, legal matter. I am not closing the door completely on this, but I just want to make clear that this is the normal protocol. This is not to say that nothing more can be done, but we have guidelines we must follow within the lines of ethical senate practices.

Now, in terms of moving forward, I am working on my report of the meeting. Also, as discussed, I will talk with Representative Watson, Mayor Dupree and Councilman Naylor re: their work on your case. In the meantime, of course, if you have any questions or concerns, please do not hesitate to call me.

Kim Coalter

Office of Senator Thad Cochran

601-965-4459

Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Sunday, August 20, 2006 10:45 AM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Irene's Chapel deserved help long ago

If a group of residents of Irene's Chapel hadn't decided six weeks ago that a visit to likely that this forgotten neighborhood would not be getting any attention.

As it is, the attention that they are getting is long overdue, and should be a source

ADVERTISEMENT Irene's Chapel was annexed to the city of Hattiesburg 15 years were made at the time - city water and sewer, paved roads, and other basics that should expect.

The neighborhood got some basics - but has suffered neglect for a good long while

The story and pictures that the *Hattiesburg American* ran Friday are illuminating - a breeding ground for mosquitoes, snakes and Lord knows what else, runs through there - actually, any citizen of Hattiesburg - should rightly be appalled that the city continue to exist.

We don't think a drainage ditch like that would be tolerated in the Avenues for very

In Irene's Chapel, the roads are potholed. The ditches that front every home for dirt lots are overgrown; one vacant house cannot even be seen from the street because lot. Code enforcement is minimal.

There are no curbs, no sidewalks, no playgrounds.

After the group of 18 residents brought their complaints to the city council, the city police officers; the city has allocated \$200,000 for repaving, and the drainage ditch according to Public Works Director Bennie Sellers.

But why has it taken so long? Why wasn't Councilman Henry Naylor doing more for on the mayor's radar?

How many other neighborhoods in Hattiesburg are in similar shape?

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It shouldn't take fed-up citizens to get action.

We should all be ashamed.

Originally published August 20, 2006



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Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Friday, August 18, 2006 8:36 PM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Drainage ditch raises safety concerns

By Reuben Mees

Three years ago, Timothy Mapp had to take his 4-year-old son to the hospital whe pit bulls he keeps in his backyard are now sickly.

Both doctors and veterinarians have warned Mapp that exposure to mosquitoes m

▼ ADVERTISEMENT ▼ But for Mapp and other residents of the Irene's Chapel commu breeding grounds is not as simple as changing the water in a bird bath or keeping

Instead, they must live with a massive drainage ditch filled with stagnant, algae-co

"I had to watch doctors stick a needle this long in my son's back," Mapp said holdir complaining about that ditch ever since, but they haven't done anything about it."

Hattiesburg Public Services Director Bennie Sellers said the problem could be con

Mapp and others complain that in a time when West Nile virus already has killed a in the county, more attention needs to be paid to the hazard.

Freddie and Sandra McDuffie, who own the property south of where the ditch cros mosquito spray truck driver will back up to spray along the dead-end Alder Lane th

"That's only because I know him," Freddie McDuffie said of the driver.

In addition to the mosquito hazard, Mapp and the McDuffie said they have seen pc

"I know you're not supposed to use guns in the city limits, but I've had to shoot quil

City personnel responded six weeks ago and removed some blockages that cause said a more permanent fix is planned for early next year.

He has proposed running a drainage pipe along Dixie Pine Road from Rouse Roa larger city drainage system along James Street.



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That project, which is estimated to cost \$200,000, is proposed in this year's annual budget hearing at City Hall.

"I feel very good that this will be approved by council," Sellers said. "I feel this will be a good project."

While some residents do not expect Sellers to follow through with this project, T.J. Road, said he has confidence in the city process.

"I believe he'll do it," Smith said. "I can't make him out to be a liar because when I see him, he's always there."

Originally published August 18, 2006

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Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Friday, August 18, 2006 8:27 PM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Neighborhood raises its voice

By Reuben Mees

It's been six weeks since a group of about 18 Irene's Chapel residents showed up at Hattiesburg City Hall demanding that their neighborhood get some much-needed attention.

The following day, city trucks, police officers, firefighters and code enforcement officers showed up en masse to demonstrate to the residents that their concerns weren't falling on deaf ears.

▼ ADVERTISEMENT ▼ The residents brought forward a list of concerns that included an algae-covered stagnant drainage ditch, poor street conditions, lax enforcement (or sometimes none) of city codes and speeding on neighborhood streets.

Some residents are concerned that as time goes by, their elected leaders' attention will fade.

"They came down and had their little show for the camera, but now it seems like it's back to the same thing," said David Rankin, a 34-year-old graduate student who organized the group that came before City Council on July 5.

But that's not the case, city officials say.

"We are keeping all of our communities in mind," Mayor Johnny DuPree said. "We wanted to make sure we heard their concerns, so we had a concerted effort. But we are doing other things to keep in sight the other concerns as it relates to speeding and code violations."

Fixing the bumpy and pockmarked roads is the first priority, the mayor and Public Services Director Bennie Sellers said.

Warren Paving has been awarded a nearly \$200,000 contract to pave every street between Edwards Street and Rouse Road, Sellers said. The project should be completed within weeks.



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The streets are being patched to prepare for that, but sometimes those patches are adding to neighbors' frustrations.

Vinna Perkins, 24, of McCall Street, pointed to a freshly patched spot on her street Thursday and said that a small patch does little to solve the problem.

"These streets are hell on your car, but that doesn't help," she said.

And while the mother of four welcomes street resurfacing, she said the city needs to follow up with appropriate speed limit and "children at play" signs to curb speeding and make it safe for young children to play outside.

Perkins' children play in the backyard because of the speeding along McCall Street.

But some families in the community - those nearest the murky drainage ditch that runs east from McCall Street - have to keep their children in the front yard.

"We can't let our boys play out back because of the mosquitoes," said Freddie McDuffie, who lives between the ditch and Alder Lane.

The drainage situation that causes stagnant water to back up into the neighborhood is scheduled to be remediated by spring of next year, Sellers said. The drainage pipe project would cost \$200,000 and is proposed in the city's annual budget.

The muck-filled ditch and patchy streets aren't the only concerns of Irene's Chapel residents. Freddie McDuffie and his wife Sandra said the community also lacks any sort of recreational activities for youths in the neighborhood.

"There are no sidewalks or playgrounds so our kids have to play basketball in the streets," Freddie McDuffie said.

"If we want to do something as a community we have to go down to Palmer's Crossing to the community center there," Sandra McDuffie said.

"I want our neighborhood looking like any other neighborhood. I know we're poor people, but we don't want to be living like dogs either."

Just across the street from the McDuffies' residence is a heavily wooded area. At first glance, no one would think it was anything more than an overgrown lot, Rankin said.

But down a short lane is an abandoned house with no doors or windows - an open invitation to animals or humans and a clear violation of the city's land codes.

DuPree said that *identifying* problems such as that vacant house is what the July 6 response to the neighborhood was intended to accomplish.

"We are following up on issues that we identified that day although some of these things take some time," he said.

Several residents also complained that the city has not been maintaining the ditches along public roads, which are overgrown with weeds.

"At least when we were part of the county, they would come and mow down the ditches," said Bessie Moore, a 33-year-resident of the community. Irene's Chapel was part of the 1991 annexation that included Palmer's Crossing. "Since we're in the city limits, how come they don't fix it like we're part of the city?"

Sellers said his crews have been hampered in their efforts to keep city right-of-ways trimmed by the need to remove debris left over by Hurricane Katrina. But he said the arrival of two new tractors, which is expected to occur within weeks, could alleviate many of those problems.

Rankin said that while he will wait to see how the city's follow-through is, he has been disappointed by Ward 5 Councilman Henry Naylor's response to the area's concerns.

"I don't see him being visible enough in the neighborhood," Rankin said. "He's in the area, but I don't see him. I just don't feel like we've gotten the representation we deserve."

"A lot of my work is behind the scenes," Naylor said explaining that he worked with DuPree and Sellers in devising the plan to address the streets and drainage.

"At the same time, if constituents feel I am not as visible, perhaps it is an area I need to improve on. The bottom line is about trying to get results."

But Naylor said he sees the residents' actions as a first step in correcting problems that will take years to fully address.

"We have got a lot more attention in Irene's Chapel and Palmer's Crossing in the near future," he said. "That's a start, I think we just need to keep that attention there."

"I applaud the group in Irene's Chapel for coming forward," Naylor said. "Hopefully that can serve as a model for other groups who want to come forward in the future."

Originally published August 18, 2006



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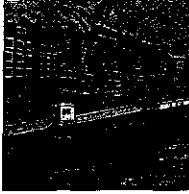
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**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003
MOTTO: PSALM 51**

"Create In Me A Clean Heart, O God; And Renew A Right Spirit With In Me"

August 17, 2006

Senator Thad Cochran
188 East Capitol Street
Suite 614
Jackson, MS 39201

Dear Senator Cochran:

The Forrest County Environmental Support Team was notified today by email that the Securities Exchange Commission has been asked to begin an inquiry into the sell of Kerr McGee.

We ask for your immediate attention because records will reflect that improper actions by the said company have relationships in Hattiesburg, MS. We also believe that Kerr McGee provided false information to its investors in order to better position itself to be purchased. There are records of an account in Hattiesburg, MS, at Trustmark National Bank, that will reflect that Kerr McGee has been involved in illegal financial activities.

We ask that you immediately notify the Chairman of the SEC of our request to have a full investigation conducted into Kerr McGee's past activities in Hattiesburg, MS. It is an attempt on our part to give proper notice to all responsible officials to prevent citizens and shareholders from falling victim to another World Com, ENRON, of a corporate scandal.

Senator Cochran, we respectfully ask that an injunction be implemented immediately to prevent the sale of Kerr McGee.

Sincerely,

Sherri Jones, Organizer
Forrest County Environmental Support Team

mbs/SJ



FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003
MOTTO: PSALM 51

"Create In Me A Clean Heart, O God; And Renew A Right Spirit With In Me"

August 13, 2006

Mayor Johnny DuPree
City of Hattiesburg
P. O. Box 1898
Hattiesburg, MS 39403-1898

Dear Mayor Dupree:

The Forrest County Environmental Support Team wishes that this was a letter thanking you for contacting Senator Cochran on behalf of your African American constituents, but instead, we must deal with the ugly face of disappointment.

Again, as the years of being oppressed by white people in power, the shocking reality is that the black community has fallen victim to a 14 billion dollar corporate giant that may very well disappear into thin air within the next 30 (thirty) days. As we look at your decisions to partnership with Kerr McGee, we believe that this may not have been a high-quality decision, especially in light of the fact that they may no longer exist. This means that you cut a deal and shook hands with people that would soon be enjoying their millions on an island retired, while public officials face angry constituents.

Who is to blame, Anyone who fails to protect the right of their African American lease holders and citizens. We can assure you that this is going to be a long list .The first cry out for help from your minority constituents came from the community in 2003, when Yvonne M. Powell, James Rogers, and Sherri Jones visited with you in your office. At the time, we were under the impression that **white folks had** orchestrated and designed this legal mess and dumped it on the **first** African American Mayor of Hattiesburg. We asked you specifically, were you aware of what was taking place in the residential area, and did you understand that Kerr McGee was actually doing remediation instead of ditch and drainage, and your answer was "no."

Mr. Mayor, you advised us that you were not aware of the work that was being performed, and referred us to Bennie Sellers, and for years, we believed Mr. Sellers was the mastermind behind the Kerr McGee project, in addition to what we believed was an improper relationship with Kerr McGee. We trusted and believed in you until the bar complaint filed against Attorney J. D. Van Slack produced a letter dated October 3, 2001, that came from the legal department of MDEQ,

August 13, 2006

and Attorney Kelly Riley advising you of a meeting dated October 29, 2001, in your office to brief you on the above matter.

The other significant thing about this letter is that it came from the attorney, which means you were being brief on the legal issues and not so much on the chemicals. Mayor Dupree, our question now is who all was present at this meeting representing the City?

Surely, you did not host this meeting without the City's legal counsel Attorney Charles Lawrence, and Bennie Sellers the Public Works Director present, who had previously placed his staff in the minority community to solicit and obtain ditch and drainage easements by submitting false and misleading information to the black lease holders which caused them to give up their rights.

The following are inserts in a document: "I/we fully understand that we have the right to receive just compensation for the use of the real property herein described based on and appraisal of said property. I/we hereby waive our rights to just compensation and donate the use of real property herein described to the City of Hattiesburg. I/we further understand that we have the right to request that a fair market appraisal of the property be made and I/we hereby waive that right."

This document and the contents of it surely reflect a sad day for the minority community. In their efforts in being good stewards, in an attempt to improve their community, the residents now realize the real facts of this case, according to Attorney Charles Lawrence; he stated that, "the City was tricked by Kerr McGee." However, the residents now believe the real David Copperfield was Mr. Bennie Sellers, Director of Public Service and the City of Hattiesburg.

We believe that further investigations will be necessary for the following reasons:

1. that all parties realize that obtaining access to the properties in the minority community was necessary in order to obtain the overall settlement agreement that resulted in **white lease holders being paid millions,**
2. The fact that access to the properties was obtained in a deceitful manner,
3. And the fact that the minority property owners were never properly notified reveals collusion by all parties and the fact that Kerr McGee had a job to perform in Hattiesburg, MS.

This was designed by **white folks** to exclude the minority community, and the records reflect this, but we know that they were assisted by African Americans. Without the following signatures, this Civil Rights tragedy could not have happened,

Dr. Davis, Superintendent, of the Hattiesburg Public School District, Sam Buchanan, Hattiesburg School Board President, and Attorney over legal services, and yours truly, Johnny Dupree, Mayor of Hattiesburg.

We pose a question to you Mayor, how can **whites** get paid millions, and the door be closed to African Americans, your reply was "the Ford dealership, the school district, and the plaintiffs, all had somebody at the table to speak for them." At that time Mayor, we had no idea that you had also been at the table with the parties involved. After six years we have tried to be diplomatic and we are exhausted after being place on the back and bottom of public official's agenda, and certainly after receiving a letter that you wrote Senator Cochran which is clearly unacceptable and we consider it a joke for the following reasons:

Forrest County Environmental Support Team

Page 2

August 13, 2006

also for you to send a copy to Senator Thad Cochran's office, 188 East Capitol Street, Ste 614, Jackson, MS 39201-2125.

Furthermore, we would like to thank you for the information that you have already provided to the Senator.

Respectfully submitted,

Marcia Starks, Secretary

Forrest County Environmental Support Team

cc: Attorney Charles Lawrence, Hattiesburg City Attorney
Mayor Johnny Dupree, City of Hattiesburg
Kim Coalter, Senator Cochran's Office
Kathleen Williams, Hattiesburg American
Sherri Jones

Forrest County Environmental Support Team

Page 3

August 13, 2006

1. You normally thank people after they have performed their duties,
2. the address where you mailed the letter was incorrect,
3. the date of the visit is incorrect,
4. And you gave the Senator the impression that there are problems between Kerr McGee and the Forrest County Environmental Support Team. You failed to mention the signatures of 17 of your constituents hand delivered you a letter stating their concerns.

We believe this is a display of your inability to advocate on behalf of your constituents because of legal reasons and fear of the ramifications from Kerr McGee. The fact is, you are under a contract and we believe this limits your ability to represent or protect the rights of the African American constituents. We believe that we have been more than generous with patience, and any actions taken on behalf of the residents and the community should not be looked upon as radical, because people chose not to get involved early enough to resolve this matter.

We believe that future actions must be taken that will affect some careers, but it is our opinion that public officials have failed to protect and perform their duties on behalf of the minority community.

As we press forward for resolution and closure, we will always continue to maintain a sincere effort to have open dialogue. It is clear that Kerr McGee's responsibility was to protect their investors and save them money. The question is what was the City's responsibility, was it to protect the citizens and their investment, or was it solely responsible to Kerr McGee to help them accomplish their hidden agenda?

We can assure you Mayor, that this is the final chapter of the Kerr McGee story, and you sir, can determine how it will read.

Respectfully yours,

Marcia Starks, Secretary
Forrest County Environmental Support Team
c/o Sherri Jones



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003
MOTTO: PSALM 51**

"Create In Me A Clean Heart, O God; And Renew A Right Spirit With In Me"

August 13, 2006

Mr. Charles H. Chisholm
Executive Director, MDEQ
P. O. Box 20307
Jackson, MS 39289-1307

Dear Mr. Chisholm:

We hope this letter find you doing well. You should be familiar with Senator Cochran's request for information about the history of the site in Hattiesburg, MS known as Gulf State Creosote.

We have been requested by the Senator's staff to provide information that will support our allegations that we are alleging on behalf of the **African American Lease Holders** and residents that we believe have been intentionally denied due process and proper notification of dangerous chemicals that has been introduced into the environment in the residential community for a number of decades.

We are requesting the following documents for an upcoming meeting to present to Senator Cochran or his staff. We are also preparing a package to forward to the Attorney General's office to ask for his assistant in the above matter. We respectfully request under the Freedom Information Act a copy of any and all documents from the year 2000- until present, in relationship to contracts with Attorney Charles Lawrence, also known as the City of Hattiesburg's Attorney.

We would like to have a copy of all contracts and checks reflecting payment to said attorney and a written explanation from you why you found it necessary to solicit his services. We would like for you to explain if Attorney Lawrence was employed in his capacity as City Attorney or as a private attorney.

Time is of essence and we respectfully request that you honor the 15 (fifteen) day rule under the Freedom Information Act. We would like for a copy of these documents to be sent to the above address of Forrest County Environmental Support Team (FCEST), and

Coalter, Kim (Cochran)

From: U.S. Securities and Exchange Commission [oiea@sec.gov]
Sent: Tuesday, August 08, 2006 11:04 AM
To: Tyner, Scott
Subject: SEC Response - File HO1168544

Dear Mr. Tyner:

We are taking your complaint very seriously, and have referred it to the appropriate people within the SEC.

Please understand that the SEC generally conducts its investigations on a confidential basis and neither confirms nor denies the existence of an investigation unless we bring charges against someone involved. We do this to protect the integrity and effectiveness of our investigative process and to preserve the privacy of the individuals and entities involved. As a result, we will not be able to provide you with any future updates on the status of your complaint or of any pending SEC investigation.

Below is a flyer that describes our policy as it will apply to your complaint. Please contact me if you have other questions.

Sincerely,

APRIL B KEYES
U.S. Securities and Exchange Commission
(202)551-6309

INFORMATION ABOUT SEC INVESTIGATIONS

Each year, thousands of investors ask the Securities and Exchange Commission to investigate the activities of other investors, financial professionals, corporations, brokerage firms, investment companies, stock exchanges, and others. These complaints generally suggest some impropriety or misconduct and sometimes make a plea to the SEC for direct assistance in resolving a grievance.

The SEC has the authority to investigate whether violations of the federal securities laws have occurred, and we make every effort to evaluate promptly and thoroughly the information provided by investors. But we cannot investigate every investor

complaint. While many investor complaints do lead to full investigations and, if appropriate, to enforcement actions, we cannot guarantee that our review will lead to further investigation or that the SEC will take any legal action.

We also cannot provide you with updates on the status of your complaint or your request for an investigation. The SEC generally conducts investigations confidentially for two main reasons. First, we can conduct investigations more effectively if they are not announced publicly. For instance, important documents and evidence can be destroyed quickly if people hear of an investigation. Second, we keep our investigations confidential to protect the reputations of companies and individuals if we find no wrongdoing or decide we cannot bring a successful action against them. The SEC will not typically confirm or deny the existence of an investigation unless, and until, it becomes a matter of public record as the result of a court action or administrative proceeding.

When there is proof that someone has violated the securities laws, the sanctions may include financial penalties, orders to surrender profits, cease and desist orders, or an injunction by a court to prevent further violations. The SEC may also bar individuals from working for a securities firm, investment adviser, or investment company. We can also ask a federal court to bar individuals from being officers and directors of publicly held companies. In some situations, we may refer a case to the Department of Justice for possible criminal prosecution.

The SEC publishes news releases about its lawsuits and administrative actions, and the news media often report on them. You can read and download the SEC's "Enforcement Actions" on our website at www.sec.gov/divisions/enforce/enforceactions.shtml. Or you can obtain hard copies by contacting us at:

Office of Public Reference
100 F Street, N.E.
Washington, DC 20549-0102
Phone: (202) 551-8090
Fax: (202) 777-1027
E-mail: publicinfo@sec.gov

COMPLAINT

Submitted: 2006-08-07

Send Copy: A copy of this may be sent to the entity.

INVESTOR INFORMATION

Name: Mr. Scott A Tyner

Address: 319 S. 21st Ave.

Hattiesburg, MISSISSIPPI (MS) 39401

UNITED STATES

Day Phone: 601-520-1751

Alt Phone:

Fax:

Email: scottatyner@yahoo.com

ENTITY INFORMATION

Name: Kerr-McGee

Type: Public Company

Rep.:

Address:

SECURITY INFORMATION

Name:

Symbol:

Type:

COMPLAINT INFORMATION

Providable Documents:

- none

Description:

Kerr-McGee has been involved in a lawsuit in my hometown of Hattiesburg, MS, under the name of Tronox, Inc. Recently, an article ran that said Kerr-McGee was being bought by Anadarko Petroleum.

I am a layman but that seems really odd that a company with liability can put the liability into one company then sell the other without liability.

I'm curious if the S.E.C. has been looking into this venture.

Coalter, Kim (Cochran)

From: Marcia Starks [msveneestarks41@yahoo.com]
Sent: Thursday, August 03, 2006 10:57 AM
To: Coalter, Kim (Cochran)
Cc: Sherri jones
Subject: Visit From the Senator
Attachments: 437608489-Letter to Johnny.doc

Ms. Coalter:

Attached is a copy of a letter that Forrest County Environmental Support Team sent to Mayor Johnny Dupree, thanking him for being a guest on the talk show, WJMG Radio, this past Saturday, where the Mayor publicly announced that he will contact Senator Cochran requesting him to come in and visit the City, so that the issue with Kerr McGee can come to a close.

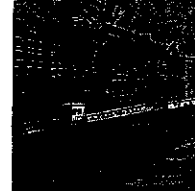
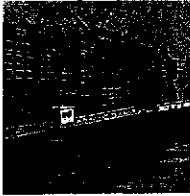
The purpose of sending you this letter is for you to inform the Senator that he should be expecting a letter of request from Mayor Dupree, as well as a letter from Councilman Henry Naylor of Ward 4 asking for the Senator to visit the city. We will be faxing you a copy of the letters from Councilman Naylor.

I will be calling to get your fax number. Please let me know if I can be of further assistance to help expedite the Senator's visit.

Respectfully,

Marcia Starks, Secretary
Forrest County Environmental Support Team (FCEST)

Do you Yahoo!?
Get on board. You're invited to try the new Yahoo! Mail Beta.



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003
MOTTO: PSALM 51**

"Create In Me A Clean Heart, O God; And Renew A Right Spirit With In Me"

July 31, 2006

Mayor Johnny Dupree
City of Hattiesburg
P.O. Box 1898
Hattiesburg, MS 39403-1898

Dear Mr. Mayor:

The Forrest County Environmental Support Team (FCEST) would like to thank you for taking time out of your busy schedule to interview with us on this past Saturday. We are especially grateful that you have publicly agreed to contact Senator Cochran along with your constituent, Councilman, Henry Naylor, to reiterate the importance of the Senator's support in resolving the creosote issue with Kerr McGee and the residents of Hattiesburg.

Moreover, we (FCEST) hope that this will bring a better working relationship with you, the Council, and all residents in the City of Hattiesburg. As you already know, time is of the essence, and we hope that you will send your letter to the Senator and Kerr McGee on your behalf as well as the City's in bringing this issue to a close. Should you require further documentation in presenting your plea to the Senator and Kerr McGee, please do not hesitate to call on us for our help.

As per our conversation, you can find the necessary information on NUSA at this web page: www.nusa.org. This website will give you information on how to become a part of the Citizens Participation Program.

Again, thank you in advance for your cooperation.

Respectfully,

Marcia Starks, Secretary
Forrest County Environmental Support Team

FIRST DRAFT

July 29, 2006

The Honorable Senator Thad Cochran

Re: Gulf States Creosote Site - Hattiesburg, Mississippi
Mississippi Commission on Environmental Quality No. 4539-03

Dear Senator Cochran:

Please accept this letter as an official request asking for your involvement in a concern regarding the previous Gulf State Creosote Site located in Hattiesburg, Mississippi. As the duly elected City Councilman of Ward 5, I am of the opinion that your efforts could expedite the resolution of this matter.

Please consider visiting our area and assist us in resolving this situation. Should you have any specific questions, do not hesitate to contact City Attorney Charles Lawrence or me at 601-545-4551.

Thank you for your consideration of this request.

Respectfully yours,

Henry E. Naylor
City Councilman, Ward 5

FIRST DRAFT

July 29, 2006

Mr. John F. Reichenberger, Vice President
Kerr-McGee Chemical LLC
Kerr-McGee Center
123 Robert S. Kerr
Oklahoma City, OK 73102

Re: Gulf States Creosote Site - Hattiesburg, Mississippi
Mississippi Commission on Environmental Quality No. 4539-03

Dear Mr. Reichenberger:

Please accept this letter as an expression of my full support for the Forrest County Environmental Support Team efforts in resolving the matter regarding the previous Gulf States Creosote Site. As an elected official and one who also grew up in the area of question, I agree that the resolution of this concern is past due.

While I have not been privy to some of the legal matters that have taken place, I do understand how the Forrest County Environmental Support Team could come to the conclusion that the City of Hattiesburg played a role in impeding their ability to pursue compensation for alleged personal damages.

I hope to be notified of future discussions on this matter.

Your immediate attention to this matter is requested and would be deeply appreciated.

Sincerely,

Henry E. Naylor
City Councilman, Ward 5

Coalter, Kim (Cochran) **United States Senate**

WASHINGTON, DC 20510-2402

From: Marcia Starks [msveneestarks41@yahoo.com]
Sent: Thursday, July 27, 2006 9:15 AM
To: Coalter, Kim (Cochran)
Cc: Sherri jones
Subject: Changes to Letter
Attachments: 2264433388-Letter 3 to Cochran.doc

Ms. Coalter:

This email to inform you of the corrections to the letter I sent you on yesterday. There are several corrections I need to clarify in the letter.

- First, in paragraph one on the second page, beginning with the minority lease holders, originally I stated that the lease holders were not notified, where as they were notified in 2002 only to be informed that this was a ditch and drain gage project.
- Next, there was a typographical error with the acronyms A.T.S.D.R, I had the letter b.
- Finally, on the second page, last paragraph beginning with the EPA statement, several important issues were missing. I have made those corrections to that statement.

I will be sending you the letter with the corrections to be forwarded to the Senator. Not under any circumstances does FCEST wants to give the impression that the citizens were not notified, but they were notified only to be told that this was a ditch and drainage project in 2002..

Again, please accept my apology for this huge typographical error.

Respectfully,

Marcia Starks, Secretary
Forrest County Environmental Support Team
Phone 205-370-8219

How low will we go? Check out Yahoo! Messenger's low PC-to-Phone call rates.

Forrest County Environmental Support Team

Page 3

July 25, 2006

United States Senate

WASHINGTON, DC 20510-2402

COMMITTEE ON
APPROPRIATIONS
CHAIRMAN

COMMITTEE ON
AGRICULTURE, NUTRITION,
AND FORESTRY

COMMITTEE ON
RULES AND
ADMINISTRATION

removal of the creosote contaminated soil was delayed because two leases on 16 Section land refuse to grant access. One is an 83 year old whose property is highly contaminated, and we believe that she deserves your immediate attention. This citizen is a carbon copy of many other minority lease holders who was intentionally excluded and they were denied due process, and it is for the above reasons, we respectfully request you to visit our community as soon as possible, so that you will be able to better assist us with our needs.

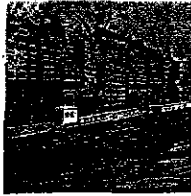
It is the opinion of the Forrest County Environmental Support Team that the information submitted to you in the EPA report does not adequately describe the event that has impacted the community for the past decade. We respectfully request your assistant in this matter.

Again, we thank you for your prompt attention and cooperation and anxiously await your visit.

Respectfully,

Marcia Starks, Secretary
Forrest County Environmental Support Team

THAD COCHRAN
MISSISSIPPI



United States Senate

WASHINGTON, DC 20510-2402

COMMITTEE ON
APPROPRIATIONS
CHAIRMAN

COMMITTEE ON
AGRICULTURE, NUTRITION,
AND FORESTRY

COMMITTEE ON
ARMED FORCES AND
AIR FORCE

FORREST COUNTY ENVIRONMENTAL SUPPORT TEAM

P.O. BOX 374

HATTIESBURG, MISSISSIPPI 39403

EIN # 20-1494003

MOTTO: PSALM 51

"Create In Me A Clean Heart, O God; And Renew A Right Spirit With In Me

July 25, 2006

Senator Thad Cochran
188 Jackson Street
Jackson, MS 39201

Dear Senator Cochran:

First, the Forrest County Environmental Support Team would like to thank you and your staff on behalf of the Hattiesburg residents that have been impacted by the toxic chemical known as creosote. Also, we would like to thank your staff for displaying a courteous and professional response by communicating our concerns to you in a timely manner.

The integrity and compassion you have for your constituents is merit by your staff that you have chosen to carry out the duties you were elected to do. The proficiency of your staff has made it easier for us to communicate our concerns to you directly.

We would especially like to thank Ms. Coalter, Ms. Wicker, and Ms. Wagley, for communicating our concerns that we are faced with here in Mississippi directly to you at our requests. Senator Cochran, it saddens us to bring to your attention that the very agency that was created to protect the people, in our opinion has failed the citizens of Mississippi.

As communicated to you in the EPA reply, dated on 7/3/2006, this is a concern that has plagued this community for several decades, and it is certainly a complex issue; one that can not be addressed or understood within a two page report.

After carefully discussing this issue, the Forrest County Environmental Support Team voted to invite you to our community; not only to give you the opportunity to speak, but

Forrest County Environmental Support Team

Page 2
July 25, 2006

United States Senate

WASHINGTON, DC 20510-2402

COMMITTEE ON
APPROPRIATIONS
CHAIRMAN

COMMITTEE ON
AGRICULTURE, NUTRITION,
AND FORESTRY

COMMITTEE ON
RULES AND
ADMINISTRATION

hope that you would be able to look, listen and learn, so that you can better understand what has happened on the site named Gulf State Creosote.

We believe that you will leave the great state of Mississippi with the same concerns and questions that your minority constituents already have.

- Why in the second paragraph did the agencies and the author of the report elected to fail to mention that portions of the same state owned track property was leased to a large number of minority residents? Could this have been an oversight of the agencies, or was it the intent of the agencies to avoid addressing the concerns of the residents by pretending that the residential properties did not suffer damages.
- When the EPA became aware of the conditions at the site around 1989 along with MDEQ, did your minority constituents that's now requesting your help, have the right to know that this danger existed in the yards, gardens, and playgrounds in the residential areas; and who's responsibility was is to notify them?
- Senator Cochran, would you please give an explanation of paragraph three, the last sentence; "the determination does not mean that the site may pose a concern to state or local government."
- We will fax Ms. Coalter a document that reflects that Kerr McGee has paid for water monitoring for the next 30 years. This work and its testing results have never been made public.
- Why did MDEQ fail to negotiate on behalf of all Lease Holders?

The minority lease holders were never notified of the dangers, but there was a public meeting held in 2002 to notify them of the work that Kerr McGee was getting ready to perform which was camouflaged and presented to the community as a ditch and drainage project.

City Councilman Henry Naylor has admitted to his constituents that this was an act of injustice to the residents, and the City Attorney, Charles Lawrence "stated that Kerr McGee tricked the City when they used city officials to submit false and misleading information to the minority residents in order to obtain access to their property without compensation, while the white lease holders were enjoying the compensation they received for a violation of their rights".

The greatest concern that this community has is that all pathways for migration was not properly addressed, and because the operation of the plant stopped in the 1960's, did not eliminate all potential for exposure. The government failed to properly notify and protect a select number of citizens from a hazardous danger that later required a major clean up to be performed in the middle of a community.

It shouldn't be necessary for us to receive data from A.T.S.D.R. to reflect that there is something wrong in our community. The fact that a five-year old child has died from cancer is sufficient evidence. The number of breast cancer, still births, and the number of people with kidney cancer and failures, yielded enough information to convince us that something is wrong.

Senator Cochran, can you afford to accept and trust a report that failed to mention the existence of an entire community? The EPA made a statement that the completion of the

July 10, 2006

Ms. Marcia Starks
Forst County Environmental Support Team
Post Office Box 374
Hattiesburg, Mississippi 39403

Dear Ms. Starks:

Today I received the enclosed response from Environmental Protection Agency officials, and I knew that you would be interested in their report.

Please share this response with Mr. Sherri Jones and other interested parties. If I can be of further assistance, please don't hesitate to let me know.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Enclosure

Activity Id: 304911
Assigned To: kc
File Location: 6150kc002
t:\personal\kc\Q69789.wpd

July 7, 2006

Mr. Sherri Jones
Forrest County Environmental Support Team
Post Office Box 374
Hattiesburg, Mississippi 39403

Dear Mr. Jones:

Thank you for your recent call to Kim Coalter in my Jackson office. As per your request, copies of the letters sent to Environmental Protection Agency and Department of Environmental Quality officials regarding the Kerr McGee issue are enclosed. The mailing information we had in our system for the EPA was incorrect but has since been corrected since the letter was sent. The letter has not been returned to my office as of this date. However, just in case, Kim also faxed the information to EPA officials to make certain the proper authorities received it.

As soon as I receive responses from the aforementioned agencies, I will be back in touch with you.

Sincerely,

THAD COCHRAN
United States Senator

TC

Enclosure

Activity Id: 304876
Assigned To: kc
File Location: 6150kc002
t:\personal\kc\Q69755.wpd

July 7, 2006

Mr. Sherri Jones
Forrest County Environmental Support Team
Post Office Box 374
Hattiesburg, Mississippi 39403

Dear Mr. Jones:

Thank you for your recent call to Kim Coalter in my Jackson office. As per your request, copies of the letters sent to Environmental Protection Agency and Department of Environmental Quality officials regarding the Kerr McGee issue are enclosed. Kim also faxed the information to EPA officials. As soon as I receive responses from the aforementioned agencies, I will be back in touch with you.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Activity Id: 304876
Assigned To: kc
File Location: 6150kc002
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 3 2006

The Honorable Thad Cochran
United States Senator
188 East Capitol Street, Suite 614
Jackson, MS 39201-2125

Dear Senator Cochran:

Thank you for your May 31, 2006, letter to the U.S. Environmental Protection Agency (EPA), concerning creosote contamination in Hattiesburg, Mississippi, and the interests of the Forrest County Environmental Support Team. To provide you with the most comprehensive response, we have coordinated this reply between EPA, the Agency for Toxic Substances Disease Registry (ATSDR), and the Mississippi Department of Environmental Quality (MDEQ).

Gulf States Creosoting Company and, subsequently, American Creosoting Corporation operated a creosote wood preservation facility on 16th Section Land in Hattiesburg, Mississippi. As you are aware, 16th Section Land in Mississippi is owned by the State and held in trust for public education. State law places day to day management of these lands in the hands of the local school board. Portions of this tract were leased to various businesses, including the creosoting companies. American Creosote ceased wood-treating operations around 1960. In 1964, Kerr-McGee Chemical Corporation purchased the assets and liabilities of the American Creosoting Corporation.

EPA became aware of conditions at the site around 1989. MDEQ, on behalf of EPA, began the site assessment process to see if the site would qualify for cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the Superfund law. Based upon a preliminary assessment and site investigation, which included sampling, MDEQ determined that no further remedial action under CERCLA was necessary. That determination was based upon application of the scoring system EPA uses to assess the relative threat associated with the release or potential release of hazardous substances from a waste site. The determination does not mean the site may not pose a concern to local residents, or state and local governments.

Given the previous determination, the site was referred to the EPA Emergency Response and Removal Branch (ERRB) to decide if any immediate action was necessary. ERRB assessed the property, in conjunction with ATSDR, and determined that the site was of low priority for a removal action and should be addressed by MDEQ.

After determining that Kerr-McGee, and now Tronox, was the responsible party, MDEQ began negotiations for a voluntary cleanup. EPA does not oversee states' voluntary cleanup programs, but does provide technical assistance upon request. The site has been proceeding through Mississippi's voluntary cleanup program. MDEQ has approved the company's cleanup plan and Kerr-McGee/Tronox and MDEQ have entered into an Agreed Order for cleanup of the site in accordance with the approved plan. For your information, I am enclosing two fact sheets issued by MDEQ at public meetings in November 2002 and October 2003. These fact sheets detail the areas being remediated and address many of the concerns regarding exposure and groundwater. At this time, completion of the removal of the creosote-contaminated soil is delayed, because two lessees (on 16th Section land) refuse to grant access.

In 2003, ATSDR received a request to conduct a health assessment in the area surrounding the site. The agency noted that because the facility ceased operations more than 40 years ago, it would be very difficult to correlate current health to previous processes; however, ATSDR agreed to do a preliminary investigation. During the site visit, remediation was ongoing, including the capping of several exposure areas with asphalt. Because current exposure was under control, and a health assessment could not be conducted based on past exposure, ATSDR concluded that a health assessment was not required.

Various plaintiffs have filed lawsuits against Kerr-McGee and Tronox regarding issues associated with the site. We understand that many, if not all, of these actions have been settled. Neither EPA nor MDEQ is aware of any settlement terms, including whether any compensation has been paid as a result of these cases.

If you have questions or need additional information from EPA, please contact me or the Region 4 Office of Congressional and Intergovernmental Relations at (404) 562-8327.

Sincerely,



J. I. Palmer, Jr.
Regional Administrator

Enclosures

cc: Charles Chisolm, MDEQ
Bob Safay, ATSDR

109 Hope Drive
Hattiesburg, MS 39402
June 20, 2006

Mr. Henry E. Naylor
P.O. Box 1898
Hattiesburg, MS 39403

Re: Creosote in Ward 5

Mr. Naylor,

I decided to write you in hope of getting a response about my concerns of Ward 5 of which you represent. I am a registered voter and very active in my community. I am speaking for myself and my family right now. Do you care if we perish or not?

The Forrest County Environmental Support Team asked you to attend a meeting on March 3, 2006. You did not make it nor called to say you would not attend. I want to know why haven't you attended that meeting or any of the other meetings? I want to know your views on the "alleged accusations" of the Kerr-Magee creosote problems in Ward 5. I stood up for you and you let me down! I just want you to be man enough to come out and let Ward 5 people know just how you stand.

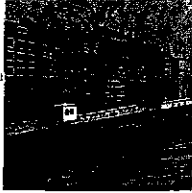
There were several people at one City Council meeting in June that spoke about the house at 116 Townsend Street being torn down. There were concern about the stench and creosote being found there. I even spoke about one of your class mate's death. She was raised not far from that house. No city officials were there when the contaminated soil was removed. That worried me! I went there after I got off of work!

There are documents proving beyond a shadow of doubt that there has been some misappropriating of work ethics! The scales of justice will prevail. I know you have the address to the Forrest County Environmental Support Team. Why don't you do the right thing and if you don't have anything to hide come, sit down and reason with us. We only want the truth. Please write back.

Respectfully,

Marie L. Hibbler

Cc: Mayor Johnny Dupree
Forrest County Environmental Support Team



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003
MOTTO: PSALM 51**

"Create In Me A Clean Heart, O God; And Renew A Right Spirit With In Me

June 15, 2006

Senator Thad Cochran
188 East Capitol Street
Suite 614
Jackson, MS 39201

Dear Senator Cochran:

We received your letter dated May 31, 2006 and we would like to thank you for your quick response. Also, we would like to thank your staff in Mississippi and Washington for being very professional and courteous, especially Kim Coalter and James Liddell.

We placed in our letter to you three requests: (1) is for you to visit our community; (2) to help our community's issues to be placed on the agenda before the environmental public works committee and the judiciary committee; (3) to request for CDC to work with our community in performing health assessments to find our the impact from these hazardous chemicals.

Secondly, we would like to thank you for requesting a report from DEQ and the EPA. The committee will also provide you a report that we believe will raise concerns: (1) it will reflect violations that have occurred under both state and federal law; (2) the failure to properly notify citizens with the misrepresentation of this project to the minority community as a ditch and drainage project; this was accomplished by Kerr McGee enlisting the City of Hattiesburg and then paying them to obtain easements and right-of-ways from the **Black Lease Holders**. This is reflected in a letter to Kerr McGee from the City of Hattiesburg, dated May 11, 2006, which we will fax to your Jackson office.

We will also email a letter dated June 10, 2006, that will reflect information not included in the letter from the City that states that Kerr McGee basically tricked the City of

Forrest County Environmental Support Team

Page 2

June 15, 2006

Hattiesburg in order to misrepresent the **Black Lease Holders**, therefore leaving the **Black Lease Holders** sitting on contaminated property.

Taxes have been reduced for the **White Lease Holders** because of the contamination in remediation that was performed. **The Black Lease Holders** continue to experience an increase in their taxes, this we believe you will find a dual tax system based upon race. We will also forward you newspaper articles where public officials admit that **White Lease Holders** have enjoyed a tax reduction.

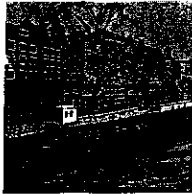
It is hard for the minority community to understand why this is still taking place in Mississippi in 2006. Senator Cochran, we again would like to thank you for accepting this challenge of assisting the minority constituents that have been impacted by toxic chemicals in Hattiesburg, Mississippi.

We look forward to being placed on your agenda for a visit to the Hattiesburg community, because our research reflects that the City have slated over 29 sites for clean up, and we want to make sure that all sites are handled with respect and integrity; and that all impacted people, black and white be allowed to sit at the table as required under the federal statute, C.E.R.C.L.A. We anxiously await for your response.

Respectfully,

Mr. Sherri Jones, Organizer
Forrest County Environmental Support Team

mbs/SJ



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403**

June 10, 2006

John F. Reichenberger, Vice President
Kerr McGee Chemical, LLC
Kerr McGee Center
123 Robert S. Kerr
Okalahoma City, OK 73102

Gulf State Creosote Site Reference, Hattiesburg MS:
Mississippi Commission on Environmental Quality: No. 4539-03

Dear Mr. Reichenberger:

This letter is to address the lack of information that was communicated to you in a letter from the City of Hattiesburg Attorney Charles Lawrence, dated May 11, 2006. It is also to notify you of a second letter from Senator Thad Cochran, dated May 31, 2006. We are disappointed with the lack of protection that city officials have displayed for the minority citizens.

Our appearance on March 21, 2006 before the City Council was not to publish our allegations against the City of Hattiesburg. Our purpose was to request that the City reposition itself in its relationship with Kerr McGee. It was at the request of Councilman Henry Naylor that the Committee appeared before the full Council. After sharing information of what we believe was an improper relationship between the City of Hattiesburg and Kerr McGee for the sole purpose of obtaining access to property owned by **Black Lease Holders** that had been excluded from the original law suit.

We expected the City to communicate to you what this Committee and the residents of the impacted area have been advised and that is as follows, according to the City's Attorney, Kerr McGee tricked the City of Hattiesburg for the purpose of misrepresenting this project to the black community.

Forrest County Environmental Support Team

Page 3

June 10, 2006

This was the attorney's position prior to May 11, 2006, and he again reiterated this again on June 6, 2006 after being hand delivered May 31 letter from Senator Cochran.

Our concern with the City's participation is that easements and right-a-ways was obtained and restrictions was placed upon properties owned by blacks by using this City of Hattiesburg as a intermediary and this allowed the residents to become good citizens and signing their rights away under the impression that their city officials were performing and upgrading a ditch and drainage project.

We will forward a copy of the May 31, 2006 from Senator Thad Cochran who has agreed to honor the request of his minority constituents and they are as follows:

- Senator Cochran personally visits the Gulf State creosote site.
- That he perform an inquiry from the proper department and forward this information to Environmental Public Works Committee and the Judiciary Committee to be placed on the agenda for future hearings.
- That Senator Cochran request CDC to work closely with this Committee in performing health assessment in impacted by creosote.

This community continues to have hopes that a partnership between all parties will lead to a resolution that would be acceptable to all involved. We will continue to work with Kerr McGee to bring closure to this matter.

The Committee has recently solicited the assistance of former U.S. District Judge, the Honorable Charles Pickering, who has agreed to sit at the table in discussions in an attempt to bring closure to what has become a 15-year legal nightmare, because of a lack of honesty, integrity, and compassion for all man kind.

We will continue to forward you information of the direction that this community plans to take this matter if it becomes necessary.

Respectfully,

Sherri Jones, Organizer
mbs

Cc: Senator Thad Cochran
Charles Lawrence
Hattiesburg City Council

May 31, 2006

Ms. Marcia Starks
Forest County Environmental Support Team
Post Office Box 374
Hattiesburg, Mississippi 39403

Dear Ms. Starks:

I received correspondence regarding toxic conditions in Hattiesburg from you, Mr. Sherri Jones and Ms. Carolyn Reed. My Jackson office staff have also received quite a few calls regarding this topic. I appreciate hearing from all of you.

In an effort to be of assistance, I have contacted the proper Department of Environmental Quality and Environmental Protection Agency officials in your behalf. As soon as I receive a report from them, I will get back in touch with you. Please feel to share this letter with Mr. Jones, Ms. Reed and any other concerned residents with whom you come in contact.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Activity Id: 303749
Assigned To: kc
File Location: 6150kc002
t:\personal\kc\Q68858.wpd

May 31, 2006

Ms. Marcia Starks
Forest County Environmental Support Team
Post Office Box 374
Hattiesburg, Mississippi 39403

Dear Ms. Starks:

I received correspondence regarding toxic conditions in Hattiesburg from you, Mr. Sherri Jones and Ms. Carolyn Reed. My Jackson office staff have also received quite a few calls regarding this topic. I appreciate hearing from all of you.

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Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Activity Id: 303749
Assigned To: kc
File Location: 6150kc002
t:\personal\kc\Q68858.wpd

May 31, 2006

Please reply to:
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125
(601) 965-4459
(601) 965-4919 Telefax

The Honorable Carol M. Browner
Administrator
Environmental Protection Agency
Office of Congressional Liaison
401 M Street, SW
Washington, D.C. 20460

Dear Mrs. Browner:

Enclosed is correspondence sent to me by my constituents regarding toxic conditions in Hattiesburg, Mississippi. My Jackson, Mississippi, office staff members have also received a number of calls regarding this issue. As a courtesy to me, I would appreciate a written response at your earliest convenience.

I have forwarded this correspondence to Mississippi Department of Environmental Quality officials. Any assistance you can provide in this matter would be deeply appreciated.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Enclosure

Activity Id: 303750
Assigned To: kc
File Location: 6150kc002
t:\personal\kc\Q68856.wpd

May 31, 2006

Please reply to:
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125
(601) 965-4459
(601) 965-4919 Telefax

Mr. Charles H. Chisolm
Executive Director
Mississippi Dept. of Environmental Quality
Office of Geology
Post Office Box 20307
Jackson, Mississippi 39289-1307

Dear Mr. Chisolm:

Enclosed is correspondence sent to me by my constituents regarding toxic conditions in Hattiesburg. My Jackson office staff members have also received quite a few phone calls regarding this issue. As a courtesy to me, I would appreciate a written response at your earliest convenience.

I have also forwarded this correspondence to Environmental Protection Agency officials. Any assistance you can provide in this matter would be deeply appreciated.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Enclosure

Activity Id: 303748
Assigned To: kc
File Location: 6150kc002
t:\personal\kc\Q68855.wpd

May 31, 2006

Ms. Marcia Starks
Forest County Environmental Support Team
Post Office Box 374
Hattiesburg, Mississippi 39403

Dear Ms. Starks:

I received correspondence regarding toxic conditions in Hattiesburg from you, Mr. Sherri Jones and Ms. Carolyn Reed. My Jackson office staff have also received quite a few calls regarding this topic. I appreciate hearing from all of you.

In an effort to be of assistance, I have contacted the proper Department of Environmental Quality and Environmental Protection Agency officials in your behalf. As soon as I receive a report from them, I will get back in touch with you. Please feel to share this letter with Mr. Jones, Ms. Reed and any other concerned residents with whom you come in contact.

Sincerely,

THAD COCHRAN
United States Senator

TC/kc

Activity Id: 303749
Assigned To: kc
File Location: 6150kc002
t:\personal\kc\Q68858.wpd

Coalter, Kim (Cochran)

From: REEDRCMOMS@aol.com
Sent: Friday, May 26, 2006 12:34 PM
To: Coalter, Kim (Cochran)
Cc: REEDRCMOMS@aol.com; sherrij45@zzip.cc
Subject: Kerr-McGee issues in Hattiesburg, Ms

Ms Coalter:

I have written you before but the e-mail came back. I called you a week or so ago concerning the Kerr-McGee issue in Hattiesburg. You wanted me to write you about our concerns.

Our concerns are that we have tried to get public officials involved in this helping us get justice for the black citizens involved in this case.

Kerr-McGee came in and paid H'burg Public School and the white 16th Section leaseholder for damages of an old creosote plant which they owned and did not pay the black leaseholder who were mostly impacted in the area across the tract. It seem that a railroad track alway separate blacks from white. We have seniors and childern who have been impacted by these chemicals. Some of the former residents have been diagnosed with lupus, cancer, stillbirths, cysts and may other ailments, we have also had family members to die, but at the time we did not know what was happening.

When Kerr-McGee paid these people they did a redemitation on the west side of the tract but called it ditch and drainage work on the east side. We they started the remediation procee residents in the neighborhood started to get sick and the doctors did not know what was causing the problems. They did not take any safety precautions for the children or anyone in the area.

We have been trying to get our public officials involved but we keep running into the same wall, it seems no one care about the Black voters. We only see public officials when it time to vote and after that they go into hiding.

We are asking Sen. Cochran to break the chain and get involved in this matter. We also ask they he would visit our community to see just what we are asking for and why we are seeking justice for the Black citizens in our community.

Thank you for you attention in this matter.

Carolyn Reed

Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:23 PM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Hattiesburg residents call for city to take a stand

By Reuben Mees

About 20 Southeast Hattiesburg residents milled about City Hall on Tuesday, carrying signs calling for the city to take a stand in a legal battle that has pitted residents against chemical giant Tronox.

The residents were asking the city to explain its role in the lawsuit against Tronox, formerly Kerr-McGee, that has been pending since the early 1990s and the remediation phase that began in 2002.

▼ ADVERTISEMENT ▼ Most recently, a home at 116 Townsend St. that sat above a creosote-contaminated drainage ditch was demolished, and there is no record of a demolition permit.

The residents also questioned how the city handles a \$2 million trust fund set up by Tronox to deal with remediation issues.

"We're just fed up and want our voice to be heard by city council and the company," Braxton Street resident James Rogers said. "We're willing to settle in a fair and equal manner. But right now our biggest concern is the city officials, and we want to see some accountability."

After the Tuesday city council meeting, City Attorney Charles Lawrence said he hopes to send a letter to Tronox this week expressing the city's willingness to reach an agreement suitable to residents and the company.

"I'm working on a draft and I'll probably have it finished later this week," he said. Lawrence was instructed by the council to draft the letter after a closed meeting to discuss the litigation two weeks ago.

Ward 5 City Councilman Henry Naylor said he supports the residents in their effort to reach an agreement.

"I applaud these citizens for their work," he said. "I fully support them for what they are trying to do, and like the mayor and Rep. Percy Watson, I will support

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them any and every way I can."

Lawrence also said in a letter the demolition at 116 Townsend St. would require a permit that would have to be obtained by either the contractor or homeowner.

Public Services Director Bennie Sellers, who has been an intermediary between Tronox and the city to complete the remediation process in the neighborhood, said he did authorize payment from the trust fund set up by Tronox to handle the work.

But he said the permit should have been obtained by either the contractor or homeowner.

Lawrence, however, said it is not uncommon for projects that require permits to be completed without obtaining a proper permit. It is a minor infraction that carries a small fine, he said.

Homeowners Will and Martha Harris, who are working with their attorney Kathleen Smiley and Tronox to resolve the case, had little to say on the matter earlier in the day Tuesday.

Unlike many of the residents who are still fighting for resolution, the Harrises continued to retain Smiley while other plaintiffs fired her from their cases.

"I'm satisfied with her representation and what Kerr-McGee is doing," Will Harris said.

Debbie Schramm, a spokeswoman for Tronox, said the company is attempting to resolve the case and doing its best to make the public aware of all issues surrounding it.

She said information was disclosed publicly at the time of the first remediation and the company is disclosing information as it arises.

"From the beginning, it was primarily an environmental remediation project although it was also being done as a project to improve the city's drainage in that area," she said. "We made no attempt to hide that and all of the reports containing information have been available at the public library."

Originally published April 19, 2006

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Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:23 PM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Officials discuss Kerr-McGee suit

By Reuben Mees

Hattiesburg and Forrest County officials discussed their role Thursday in the ongoing community and a chemical giant that now owns the former Gulf States creosote plant.

Residents from an area bounded by the railroad tracks on the northwest and Marti meeting to hear from a county supervisor, two members of the county tax assessors the Mississippi Bar Association.

▼ ADVERTISEMENT ▼ The group discussed the past and present status of a federal land is now known as Tronox.

The case filed by the Hattiesburg Public School District dates back to the early 1990s neighborhood southeast of the tracks believe they were intentionally left out of that deny the citizens their civil rights.

The school district filed the suit because it owns nearly all the land in question and

That case was settled in 2002 when the school district received almost \$4.5 million white business owners, on the opposite side of the tracks settled for undisclosed a

But the settlement also resulted in a reduction in the taxable value of the land north program in the southeast neighborhood that the residents claim was done without

Bruce Templeton, chief tax assessor for Forrest County, acknowledged that he low neighborhood after the school district paid for and submitted an environmental survey the soil.

"We will do the same thing for this side of the tracks, but we are appraisers and as Templeton said.

"Why do we have to pay and wait for our taxes to be lowered when folks on that side district paid?" resident James Rogers asked.



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But the residents were also incensed over the city's involvement in the lawsuit, which City Public Works Director Bennie Sellers, who did not attend the evening meeting intermediary between Kerr-McGee and the residents to complete the remediation of Environmental Quality.

Sellers said the city managed a \$2 million payment from the company and oversaw city is handling the current Classic Drive improvement project for University of Sou

"We acted as a conduit based on the plans and specifications agreed by Kerr-McGee way I saw it the city of Hattiesburg got about \$2 million in work to improve the neighborhood."

But Sherri Jones, organizer of the Forrest County Environmental Support Team, said access to the neighborhoods eliminated residents from discussions with the company

"Going door-to-door was what they should have done in 1992," he said. "Kerr-McGee residents so they partnered with the city of Hattiesburg."

Jones said recent efforts by Mayor Johnny DuPree and State Rep. Percy Watson

"I don't think the city's role at this point is clearly defined," city attorney Charles Lay of the frustration the committee feels, but we have to look to state law to determine

Adam Kilgore, the bar association's general counsel, also described the process for

Many residents have claimed Gulfport lawyer Kathleen Smiley has inadequately re-mails to Kerr-McGee lawyers and failed to return calls or see them during visits.

While Kilgore said he could not comment on specifics of any existing or previous communication are not typically considered ethical violations while some of the

Smiley did not return a telephone call seeking comment.

Kerr-McGee spokeswoman Debbie Schramm, who has denied any racial motivation Thursday the case is continuing to advance. Contractors recently tore down a home contamination from the soil there, she said.

Originally published March 24, 2006



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Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:23 PM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Many wait on creosote settlement

By Reuben Mees

Clevester Woods said she would gladly move from her Scooba Street home that s high levels of the carcinogen creosote.

But she said she doesn't intend to leave the home and 51 years of memories it ha property and health problems caused by living there.

▼ ADVERTISEMENT ▼ "They can have it, but I have to be comfortable," she said. "Mo shaking. I just want to make sure there is some justice."

Woods is one of numerous residents in the predominantly black southeast Hattiesl claims with Kerr-McGee, a chemical giant now known as Tronox that owns the pro located in the early 20th century.

Tronox officials and Mississippi Department of Environmental Quality environment neighborhood in recent months and are hoping to finish the cleanup by the middle

"The next phase of the plan will include remediation of the drainage ditch and sew spokeswoman Debbie Schramm.

That is centered around a 116 Townsend St. home where the residents have alrea significant contamination in the soil.

"Some places as deep as 5 to 6 feet, but most seem to be in the top 1 to 3 feet," s assessment and remediation division chief. "We're trying to determine where, how together a plan to meet the removal of the creosote."

After the area around Townsend and Harrell is cleaned, Schramm said, they will at and East Side Avenue, where a contaminated drainage ditch runs behind Woods' l Restaurant.

But while Woods and the restaurant owners may see closure on their particular prc class action lawsuit of several thousand residents, many of whom still have not ac



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"We want to see justice done for all these people," Forrest County Environmental

The company has offered to settle with clients at least twice - the first of which was an action suit. While several hundred people reportedly took this offer, many more came to a Dec. 1 hearing in U.S. District Court.

But some people still have not settled their claims and have less than six months to

To help resolve this, Jones said the group has recruited State Rep. Percy Watson with Ward 5 Councilman Henry Naylor.

"I've been talking to the organizers and talking to a couple of officials at Kerr-McGee stages of the discussion, but it seems both sides want to end the controversy. It's just a matter of time they should find."

Schramm said about 2,000 claims have been settled with residents in excess of \$1

But leaders of the effort in the black community say that \$1.3 million for the thousands of claims compared to the multi-million dollar settlement from an earlier case.

The previous case was filed in 1992 and settled in 2002 with the Hattiesburg Public Schools over the railroad tracks. While the settlement is not public, the school district received no significant property tax reductions immediately after the outcome.

"We want the contamination cleaned up. We want financial justice - the same justice that the Rev. Ivory Walmon, who was a longtime resident of the neighborhood.

Attorney complaints

But the environmental issues are only one aspect of the case, Woods said.

Throughout the case, Woods and numerous other residents were unsure exactly what

Kathleen Smiley of Gulfport, one of three lawyers who have been involved with the case, but the client said her lawyer has not returned calls or seen her when she visited her

"She won't return our calls and she won't see us if we go down there," Woods said. "It's a big problem for her to get up here, but she can get to Laurel where she settled a case worth a million."

Smiley did not return calls for this story or other recent stories on the issue.

Woods said Smiley stopped working with large portions of the community after the

Woods produced e-mails between Smiley and Kerr-McGee in which the lawyer refused to tell Kerr-McGee officials to "hold strong" on their \$400 offer to her clients.

Woods produced documents regarding a new complaint filed two weeks ago against Smiley on Wednesday to respond.

"The attorney completely disregarded and disrespected her clients," said Basil Hall, who is volunteering to assist the local group in their fight.

"Never showing up in court at the court dates and having private phone conversations with clients in disregard for her clients."

But Hall said despite the problems, he believes the chemical company will do the r

"We do believe Kerr-McGee will come to an agreement and work out a resolution,
regarding the whole situation to just ignore it."

Originally published February 13, 2006

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Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:19 PM
To: Coalter, Kim (Cochran)
Subject: FW: Metting in Jackson, MS

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

From: REEDRCMOMS@aol.com [mailto:REEDRCMOMS@aol.com]
Sent: Thursday, May 25, 2006 4:53 PM
To: patcorbett@tronox.com; ldickerson@tronox.com
Cc: sherrij45@zzip.cc; REEDRCMOMS@aol.com
Subject: Metting in Jackson, MS

Dear Gentlemen:

The Forrest County Environmental Support Team would first like to thank you and the Kerr-McGee Corporation for your continued efforts and concerns for what we believe have become a legal and environmental tragedy in Hattiesburg, MS, because of a lack of honesty and integrity displayed by people in positions that should have been representing both the community and Kerr-McGee. We would also like to apologize for canceling the meeting which was schooled for 7 a.m. Tuesday morning. We very much appreciate the concerns that representatives of Kerr-McGee have began to display that you have of resolving this matter. It is for these reasons the committee elected to reschedule the meeting with your company in order to allow time for continued dialogue in hope that a resolution could be agreed upon that would allow Kerr-McGee access to all necessary properties in the community to complete your project. We also hope that such an agreement will result in the immediate relocation of the residents at 106 Scooba St. and resolution with Down Home Cooking.

We however will not stop or delay pursuing all avenues that we feel is necessary and available to the community to obtain a fair and just resolution on behalf of the entire minority community who we believe the record will now reflect were excluded, mislead and misrepresented by all parties involved and denied due process. We however continue to enter into every meeting and discussion in hopes of developing a working relationship with Kerr-McGee for the sole purpose of improving the environment in our community.

We would like to thank Mr. Corbett for his extra effort in visiting our state during times where we all are concerned about our safety when we travel. We believe by his visit it displayed your interest in resolving this matter. We would also like to thank Mr. Dickerson who has continued to try to make sure that the lines of communication stays open whiten we believe will result in parties being able to find common ground that would allow both Kerr-McGee and the minority community to work toward resolution.

Last but not least we would like to thank Honorable Percy Watson who we believe possesses the ability to assist both Kerr-McGee and his constitutions in resolving this matter. The committee upon recommendation of Vermell Woods will yield a designated time an allow the participants in Monday's meeting and opportunity to resolve their issues.

We will be forwarding the representative listed above of the information and work that this committee have been and will continue to be engaged in for the purpose of resolving these issues that has plague our community for over 5 decades. Again we would like to thank all parties involved.

Forrest County Environmental Support Team

Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:16 PM
To: Coalter, Kim (Cochran)
Cc: REEDRCMOMS@aol.com
Subject: RE:

Ms Kim we don't expect anything, when your black and live Mississippi and 45 years old you kinded understand how things work, our concerns have already been forward to the appropriate folks for the past six years and the response have been the same nobody desires to become involve, we understand that if sen Cochran response is the same, then we will simply put his name on the list with the other public officials the have no concerns about what happens in the black community. Our request is simply will he visit our community and will he help with hearing on this matter. We need a yes or no then we can decide what to do next.....thanks for your time you have been kind.....sj

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

From: Coalter, Kim (Cochran) [mailto:Kim_Coalter@cochran.senate.gov]
Sent: Thursday, May 25, 2006 8:52 AM
To: sherrij45@zzip.cc
Subject:

We can't promise anything, so please don't think we can definitely make something happen. However, I will share your concerns with the appropriate folks. Thanks!!!

From: Sherri Jones [mailto:sherrij45@zzip.cc]
Sent: Wednesday, May 24, 2006 6:10 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Thanks Ms Kim we meet this week with Kerr-McGee if we could get a little support for sen. Cochran this nightmare could be put it rest thanks for your time sj.

Patrick S. Ccorbett Vice President of safety and environmental affairs for Kerr-McGee was in Jackson on Monday of this week and we look forward to a good relationship with the company but we still need the support of our elected official.....

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

From: Coalter, Kim (Cochran) [mailto:Kim_Coalter@cochran.senate.gov]
Sent: Wednesday, May 24, 2006 8:01 AM
To: Sherri Jones
Subject: RE: Kim with Senator's office

'Sorry – I have so many cases, I can't remember folks right off the bat! I am collecting letters, and then I will send them all at once to the proper officials.

From: Sherri Jones [<mailto:sherrij45@zzip.cc>]
Sent: Tuesday, May 23, 2006 5:54 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Ms Kim I am sorry this is regarding the request from FORREST COUNTY ENVIRONMENTAL SUPPORT TEAM about a visited to our community thank you.

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

From: Coalter, Kim (Cochran)
[\[mailto:Kim_Coalter@cochran.senate.gov\]](mailto:Kim_Coalter@cochran.senate.gov)
Sent: Tuesday, May 23, 2006 8:29 AM
To: Sherri Jones
Subject: RE: Kim with Senator's office

What is this regarding?

From: Sherri Jones [<mailto:sherrij45@zzip.cc>]
Sent: Monday, May 22, 2006 10:03 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Ms Kim please let use know how long it will be before we can a reply from sen. Cochran thanks.....

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

From: Coalter, Kim (Cochran)
[\[mailto:Kim_Coalter@cochran.senate.gov\]](mailto:Kim_Coalter@cochran.senate.gov)
Sent: Wednesday, January 11, 2006 2:07 PM
To: sherrij45@zzip.cc
Subject: Kim with Senator's office



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003
MOTTO: PSALM 51**

**"Create In Me A Clean Heart, O God; And Renew A Right Spirit
With In Me"**

May 16, 2006

Senator Thad Cochran
188 East Capitol Street
Suite 614
Jackson, MS 39201

Dear Senator Cochran:

Once again the **Forrest County Environmental Support Team** is contacting your office regarding the Kerr McGee case. The last time we heard from your office was on January 11, 2006 from Ms. Kim Coalter. Three months have past and local and state officials have failed to take the necessary steps to ensure that the rights of the minority citizens are protected.

We have jumped through many hurdles to get to the point where we are now, and still haven't been able to resolve the issue with Kerr McGee. We started with our city officials and they have turned and looked the other way, until we started using legal, valid documents informing minority residents of Hattiesburg the monstrosity the **Black Lease Holders** have incurred.

You have been a Senator for over 20 years, and yet your record is vague when it comes to supporting bills and promoting lively hood here in the Black Pine Belt. The **Black Lease Holders** here in Hattiesburg have been done a terrible injustice and we are asking for you to step up to the plate and use your authority to help restore to the **Black Lease Holders** what they have been deprived of, and hold Kerr McGee, the City and the State of Hattiesburg, and attorneys pretending to represent the citizens of Hattiesburg responsible for the deception they have placed on the residents here in Hattiesburg.

Senator Thad Cochran

Page 2

May 16, 2006

Senator Cochran, we are requesting your assistance in this matter because you are an elected official with the responsibility of serving and protecting all citizens. We have a meeting scheduled with Kerr McGee the week of May 22, 2006. It is our goal to develop a relationship that will resolve this matter. We ask for any immediate attention that you may be able to provide to encourage Kerr McGee to move forward with respect, decency, and integrity. The court has granted the residents six months to resolve this matter and we have less than two months to resolve the case.

We're respectfully requesting that you become involve for two reasons: (1) our records and research will reflect a double-standard has been executed in the remediation that was performed in a tax reduction granted to white lease holders of state owned property; (2) secondly, we request a hearing before the appropriate committees, the Environmental Public Works Committee, and Judiciary Committee for the purpose of discovering if the minority residents civil rights and civil liberties have been violated. We believe that federal violations have occurred.

At the heart of our requests, we also ask that you visit our community for the purpose of touring this site to gain personal knowledge of how dangerous chemicals have caused this community to suffer for more than 50 years. Information about this site can be found under Gulf State Creosote, Hattiesburg, Mississippi. The EPA calls this site one of the second most dangerous sites in the United States. They also stated that the state had made mistakes in the handling of this matter.

We would appreciate you giving this matter your prompt attention. Thanks in advance for your assistance. We hope you will use this opportunity to improve your relationship with this community.

Sincerely,

Sherri Jones, Organizer
Forrest County Environmental Support Team

mbs/SJ

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Hattiesburg residents call for city to take

By Reuben Mees

About 20 Southeast Hattiesburg residents milled about City Hall on Tuesday, carrying signs calling for the city to take a stand in a legal battle that has pitted residents against chemical giant Tronox.

The residents were asking the city to explain its role in the lawsuit against Tronox, formerly Kerr-McGee, that has been pending since the early 1990s and the remediation phase that began in 2002.

Most recently, a home at 116 Townsend St. that sat above a creosote-contaminated drainage ditch was demolished, and there is no record of a demolition permit.

The residents also questioned how the city handles a \$2 million trust fund set up by Tronox to deal with remediation issues.

"We're just fed up and want our voice to be heard by city council and the company," Braxton Street resident James Rogers said. "We're willing to settle in a fair and equal manner. But right now our biggest concern is the city officials, and we want to

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see some accountability."

After the Tuesday city council meeting, City Attorney Charles Lawrence said he hopes to send a letter to Tronox this week expressing the city's willingness to reach an agreement suitable to residents and the company.

"I'm working on a draft and I'll probably have it finished later this week," he said. Lawrence was instructed by the council to draft the letter after a closed meeting to discuss the litigation two weeks ago.

Ward 5 City Councilman Henry Naylor said he supports the residents in their effort to reach an agreement.

"I applaud these citizens for their work," he said. "I fully support them for what they are trying to do, and like the mayor and Rep. Percy Watson, I will support them any and every way I can."

Lawrence also said in a letter the demolition at 116 Townsend St. would require a permit that would have to be obtained by either the contractor or homeowner.

Public Services Director Bennie Sellers, who has been an intermediary between Tronox and the city to complete the remediation process in the neighborhood, said he did authorize payment from the trust fund set up by Tronox to handle the work.

But he said the permit should have been obtained by either the contractor or homeowner.

Lawrence, however, said it is not uncommon for projects that require permits to be completed without obtaining a proper permit. It is a minor infraction that carries a small fine, he said.

Homeowners Will and Martha Harris, who are working with their attorney Kathleen Smiley and Tronox to resolve the case, had little to say on the matter earlier in the day Tuesday.

Unlike many of the residents who are still fighting for resolution, the Harris family continued to retain Smiley while other plaintiffs fired her from their cases.

"I'm satisfied with her representation and what Kerr-McGee is doing," Will Harris said.

Debbie Schramm, a spokeswoman for Tronox, said the company is attempting to resolve the case and doing its best to make the public aware of all issues surrounding it.

She said information was disclosed publicly at the time of the first remediation and the company is disclosing information as it arises.

"From the beginning, it was primarily an environmental remediation project although it was also being done as a project to improve the city's drainage in that area," she said. "We made no attempt to hide that and all of the reports containing information have been available at the public library."

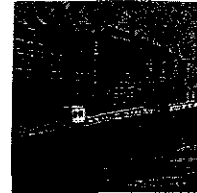
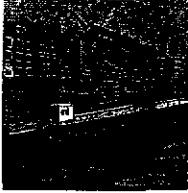
Originally published April 19, 2006

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**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM**

P.O. BOX 374

HATTIESBURG, MISSISSIPPI 39403

EIN # 20-1494003

MOTTO: PSALM 51

**"Create In Me A Clean Heart, O God; And Renew A Right Spirit
With In Me"**

May 16, 2006

Senator Thad Cochran
188 East Capitol Street
Suite 614
Jackson, MS 39201

Dear Senator Cochran:

Once again the **Forrest County Environmental Support Team** is contacting your office regarding the Kerr McGee case. The last time we heard from your office was on January 11, 2006 from Ms. Kim Coalter. Three months have past and local and state officials have failed to take the necessary steps to ensure that the rights of the minority citizens are protected.

We have jumped through many hurdles to get to the point where we are now, and still haven't been able to resolve the issue with Kerr McGee. We started with our city officials and they have turned and looked the other way, until we started using legal, valid documents informing minority residents of Hattiesburg the monstrosity the **Black Lease Holders** have incurred.

You have been a Senator for over 20 years, and yet your record is vague when it comes to supporting bills and promoting lively hood here in the Black Pine Belt. The **Black Lease Holders** here in Hattiesburg have been done a terrible injustice and we are asking for you to step up to the plate and use your authority to help restore to the **Black Lease Holders** what they have been deprived of, and hold Kerr McGee, the City and the State of Hattiesburg, and attorneys pretending to represent the citizens of Hattiesburg responsible for the deception they have placed on the residents here in Hattiesburg.

Senator Thad Cochran

Page 2

May 16, 2006

Senator Cochran, we are requesting your assistance in this matter because you are an elected official with the responsibility of serving and protecting all citizens. We have a meeting scheduled with Kerr McGee the week of May 22, 2006. It is our goal to develop a relationship that will resolve this matter. We ask for any immediate attention that you may be able to provide to encourage Kerr McGee to move forward with respect, decency, and integrity. The court has granted the residents six months to resolve this matter and we have less than two months to resolve the case.

We're respectfully requesting that you become involve for two reasons: (1) our records and research will reflect a double-standard has been executed in the remediation that was performed in a tax reduction granted to white lease holders of state owned property; (2) secondly, we request a hearing before the appropriate committees, the Environmental Public Works Committee, and Judiciary Committee for the purpose of discovering if the minority residents civil rights and civil liberties have been violated. We believe that federal violations have occurred.

At the heart of our requests, we also ask that you visit our community for the purpose of touring this site to gain personal knowledge of how dangerous chemicals have caused this community to suffer for more than 50 years. Information about this site can be found under Gulf State Creosote, Hattiesburg, Mississippi. The EPA calls this site one of the second most dangerous sites in the United States. They also stated that the state had made mistakes in the handling of this matter.

We would appreciate you giving this matter your prompt attention. Thanks in advance for your assistance. We hope you will use this opportunity to improve your relationship with this community.

Sincerely,

Sherri Jones, Organizer
Forrest County Environmental Support Team

mbs/SJ

**Charles E. Lawrence, Jr.**

ATTORNEY AND COUNSELOR-AT-LAW

P.O. BOX 1624 • 1105 EDWARDS ST. • HATTIESBURG, MS 39403-1624 • TELEPHONE (601) 582-4157

May 11, 2006

Mr. John F. Reichenberger, Vice President
Kerr-McGee Chemical LLC
Kerr-McGee Center
123 Robert S. Kerr
Oklahoma city, OK 73102

Re: Gulf States Creosote Site - Hattiesburg, Mississippi
Mississippi Commission on Environmental Quality No. 4539-03

Dear Mr. Reichenberger:

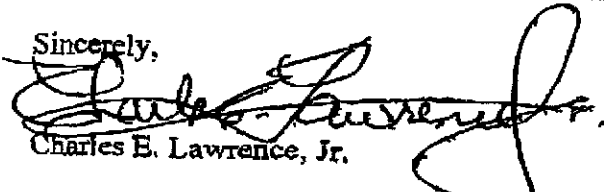
Please be advised that on or about March 21, 2006 the Forrest County Environmental Support Team group appeared before the Hattiesburg City Council to publish their allegation against the City that it had failed to protect its citizens, particularly those that lived in the Scooba Street area across the railroad tracks from the previous Gulf States Creosote Site.

The membership of this group believes and have alleged that the City of Hattiesburg, by its entry into the Escrow Agreement for the upgrade of the northeast drainage ditch in conjunction with your company's remediation project, impeded their ability to pursue compensation for any damages they may have sustained. It has been explained to the leadership of this group that the City's involvement in the remediation project was to serve as a conduit for the funds from your company to flow through for payment of the excavation of contaminated soil located in the drainage ditch. Further, that the agreement was entered into for the purpose of expediting matters since the City was in the process of making drainage improvements along the northeast drainage ditch.

The City Council has directed that I contact your company to express their desire that this matter involving the remediation project and the residents in the area be cleared up and resolved as quickly as possible.

Your immediate attention to this matter will be greatly appreciated.

Sincerely,


Charles E. Lawrence, Jr.

cc: Hattiesburg City Council
Mayor Johnny L. DuPree
Forrest County Environmental Support Team



Charles E. Lawrence, Jr.

ATTORNEY AND COUNSELOR-AT-LAW

P.O. Box 1624 • 1105 EDWARDS ST. • HATTIESBURG, MS 39403-1624 • TELEPHONE (601) 582-4157

April 12, 2006

Mr. Sherri Jones
Forrest County Environmental Support Team
P. O. Box 374
Hattiesburg, MS 39403-0374

Re: Request for Copy of Demolition Permit issued for 116 Townsend Street

Dear Mr. Jones:

Per your request for a copy of the demolition permit issued for property located at 116 Townsend Street, please be advised that an examination of the city's record indicated that the City of Hattiesburg did not issue a demolition permit for that property.

According to Mr. Sellers, this house was demolished based upon an agreement reached between the property owner and Kerr McGee. To my knowledge the City was not a party to the agreement. Further, it was discovered during the remediation process that creosote appeared to be located in the vicinity of the porch of the house and an examination of old aerial photographs revealed that a ditch appeared to flow in the direction of the house.

It is the responsibility of the property owner and/or the contractor to obtain the necessary permit from the City for demolition of a house. If the necessary permit is not obtained, it is a violation of City ordinance for which the property owner and/or contractor could be assessed a fine.

I trust that this letter will answer your questions regarding whether a permit was issued for this particular demolition.

Sincerely,

Charles E. Lawrence, Jr.

J. B. VAN SLYKE, JR.
ATTORNEY AT LAW

TELEPHONE: (601) 268-6199 P. O. BOX 1506, HATTIESBURG, MS 39403 FAX: (601) 579-8424

OCTOBER 20, 2003

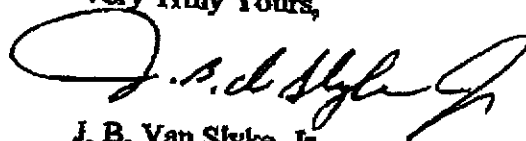
Mr. Bennie Sellers, City Engineer
City of Hattiesburg - City Hall
Hattiesburg, Ms 39401

Dear Mr. Sellers:

After being advised of the progress of the cleanup under the remedial action plan, approved by the Mississippi Department of Environmental Quality, on the 16th Section land located in Hattiesburg, Mississippi, and managed by the Hattiesburg Public School District, pursuant to §29-3-1 of the Mississippi Code of 1972, Annotated, and pursuant to discussing the same with the office of the Secretary of State of Mississippi pursuant to § 29-3-2 of said Code, the Hattiesburg Public School District will allow the contractors to go on to the 16th Section land to carry out work in the remediation plan, under the supervision of the Mississippi Department of Environmental Quality and the City of Hattiesburg based on the following:

- Drainage easements have been executed by the interested parties to the City of Hattiesburg;
- A perpetual Easement has been executed pursuant to order for the purpose of remediation; and
- Statutes pertaining to management of 16th Section lands, in particular §29-3-85 of the Mississippi Code of 1972, Annotated.

Very Truly Yours,



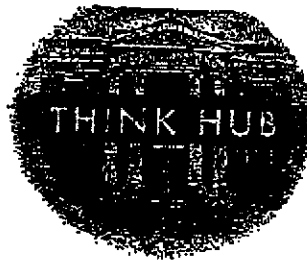
J. B. Van Slyke, Jr.
Attorney for Hattiesburg
Public School District

Enclosure: Woods Easement

CC: Ms. Woods
Honorable Charles Lawrence
Secretary of State

City Council

Betsy M. Rowell.....Ward One
 Deborah L. Bennet.....Ward Two
 Carter Carroll.....Ward Three
 C. E. "Red" Bailey.....Ward Four
 Henry E. Naylor.....Ward Five



Post Office Box 1898
 Hattiesburg, Mississippi 39403-1898

City of Hattiesburg

Johnny L. DuPree, Mayor

MEMORANDUM

TO: Mayor and City Council

FROM: Bennie J. Sellers, P.E., P.L.S., Director of Public Services *BJS*

DATE: April 14, 2003

RE: **Engineering Agreement Between City of Hattiesburg and Shows, Dearman & Waits, Inc. - Provide Construction Engineering for Environmental Remediation and Drainage Improvements on Ditch from Scooba Street to Katie Avenue (Kerr-Magee)**

Kerr-Magee had entered into an agreement with Shows, Dearman & Waits, Inc. to provide design engineering and construction engineering services for the above referenced project. The escrow agreement that was executed between Kerr-Magee Chemical LLC and the City of Hattiesburg on March 26, 2003, included monies in the amount of 7% of construction costs for construction engineering services for said project. Therefore, it is necessary that this agreement be executed between Shows, Dearman and Waits, Inc. and the City of Hattiesburg since the City of Hattiesburg will be the Payee on said project.

Should you have any questions or comments pertaining to this matter, please let me know. You may contact me at your convenience @ 545-4540, via fax 545-4642 or via e-mail address pubser@hattiesburgms.com.

BJS/kac

4.0 Pre-Construction Activities

Certain tasks must be completed prior to mobilizing to the field for construction activities. These tasks include the following:

- coordinating with the City of Hattiesburg to obtain construction easements from landowners and/or surface leaseholders and for contracting the overall project;
- coordinating the clearance of subsurface and overhead utilities;
- surveying construction easements and anticipated excavation boundaries;
- designating exclusion zones and other work areas; and
- coordinating with the City of Hattiesburg on traffic control issues.

Details regarding these tasks are provided in this section.

4.1 Construction Easements

The City of Hattiesburg Public Services Department is currently working to obtain easements from landowners and/or surface leaseholders along the ditch. The City will obtain two types of easements for the project:

- a 15-foot wide drainage easement (i.e., 7.5 feet on either side of the centerline of the proposed drainage pipe) to allow the City or its contractor to perform maintenance of the culvert system; and
- 10-foot wide temporary construction easements running parallel with and adjacent to both edges of each drainage easement.

Proposed City easements are shown on Sheets 3 through 9 of the construction drawing package, which is submitted with this work plan and incorporated herein by reference.

4.2 Utilities Clearance

The contractor selected to provide construction services will be responsible for identifying all subsurface and overhead utility lines located within the easements for the project. This will consist of requesting utilities clearance from Mississippi One-Call and coordinating with the City of Hattiesburg Public Services Department. The contractor will take precautions to protect utilities from damage during construction. Should the relocation of utility lines be required, the contractor will coordinate with the utility owner regarding the scope, schedule, and payment for such relocation.

4.3 Surveying and Temporary Fencing

Prior to mobilization, the following boundaries will be surveyed by a professional land surveyor licensed in Mississippi:

- the outer boundaries of the construction easements on each side of the ditch; and
- the approximate boundaries of the anticipated excavation.

The excavation will be a minimum of 6 feet wide (i.e., 3 feet on either side of the centerline of the proposed pipe), but may be as wide as 12 feet in some areas (e.g., in areas where

9.0 Schedule

The schedule for the removal action is largely dependent on site access and contracting issues. The City is currently obtaining easements and will soon begin the process of selecting a construction contractor. It is anticipated that mobilization will occur within one month of contractor selection.

STATE OF MISSISSIPPI
COUNTY OF FORREST
CITY OF HATTIESBURG

DRAINAGE EASEMENT

For and in consideration of the sum of Ten Dollars (\$10.00), cash in hand paid, and other good and valuable considerations, including the benefits to be derived here from **THE HOUSING AUTHORITY**, does hereby grant and convey unto **CITY OF HATTIESBURG**, a municipal corporation, an easement over, across and upon a parcel of real property, for the construction and maintenance of drainage facilities over and across the following described real property located in the City of Hattiesburg, Forrest County, Mississippi:

A 15 foot wide Permanent Drainage Easement being part of the Northwest 1/4 of the Northwest 1/4 of Section 15, T-4-N, R-13-W, Forrest County, Mississippi, being 15 feet either side of a centerline more particularly described as follows: Commence at the Southeast corner of Block 109 of Robertson Place Subdivision and thence run North along the East line of said Block 109 and along the West Right-of-Way of Charles Street for 31.9 feet, more or less, to the centerline of an existing underground drainage structure and to the Point-of-Beginning, thence run Westerly along said existing drainage structure for 8.8 feet, thence run N 86°42' W for 238.3 feet, thence run S 69°22' W for 3.6 feet, more or less, to the intersection of an existing drainage with the West line of said Block 109 and to the Point-of-Ending. The above herein described Permanent Drainage Easement contains .086 acres.

And also an additional 10 foot Temporary Construction Easement running parallel with and adjacent to the Northern and Southern lines of the above herein described Permanent Drainage Easement.

I/we fully understand that we have the right to receive just compensation for the use of the real property herein described based on an appraisal of said property. I/we hereby waive our right to just compensation and donate the use of real property herein described to the City of Hattiesburg. I/we further understand that we have the right to request that a fair market value appraisal of the property be made and I/we hereby waive that right.

The Grantee herein is given the right to do whatever may be necessary or proper for the enjoyment of the rights herein granted, including the right of ingress and egress and the right to clear said right-of-way so selected of such shrubs, trees and other vegetation as may be necessary.

WITNESS OUR SIGNATURES on this, the 20th day of June, A.D., 2001.

Milan Hoze
MILAN HOZE, EXECUTIVE DIRECTOR

This day there came and appeared before me, the undersigned authority in and for County and State, the within named **THE HOUSING AUTHORITY**, who acknowledged before me that he/she signed, executed and delivered the above and foregoing easement on the day and year therein, mentioned as their own free and voluntary act and deed.

Given under my hand and official seal of this office on this, the 21st day of June, A.D., 2001.

Doris Elizabeth Herndon

LAW OFFICES OF
KATHLEEN L. SMILEY, PLLC

KATHLEEN L. SMILEY, ESQ.

DAVID BRISOLARA, ESQ.

MICHAEL A. FENASCI, ESQ.*
OF COUNSEL

*Only Admitted in Louisiana

JOHN ROMANO, ESQ.*
OF COUNSEL

* Only admitted in Florida

PATRICE PEAKE,
Litigation/Office Manager

DELLA BRISOLARA, Paralegal
CINDY DEAN, Receptionist
CARL MILLER, Investigator
ROBIN MARK, Bookkeeper

April 11, 2003

Dear Client:

As you know, my law firm is working along with Attorney, Alethea Milton-Shaw on your case. We have already filed your lawsuit in Forrest County Circuit Court, against Kerr-McGee for the creosote contamination problem in your neighborhood and the case is proceeding on schedule.

We have assembled a large computer database of information relating to health problems in your community and we are reviewing all governmental and private test results and sampling information. Following our review of the existing samples, we will decide on a future scientific sampling plan. Many of you have not filled out the medical questionnaire that we need to evaluate your specific case. This may hold up your case from moving forward, so please contact our office immediately, if you have not filled out a questionnaire.

Contrary to a false rumor which has been circulated, we have not settled any cases, we have not made any offer to settle and we have not received any money from the defendants. If any such offers are made, we will immediately inform you and discuss the offer completely. Likewise, we are moving forward with your case.

We also wanted to inform you that the 3 million dollar settlement that Kerr McGee is paying the City of Hattiesburg, after 10 years of litigation, which you may have heard about, has nothing to do with your specific case. The City recently accepted \$3,000,000.00 in clean-up costs in a completely separate lawsuit.

If you have any questions about your case, please feel free to call our offices in Gulfport. These environmental cases can take years and cost a great deal of money to take on. We appreciate your patience, and we will send you letters from time to time to inform you of our progress.

Lastly, we will be sending out letters to you soon to set up individual meetings in May and June to personally evaluate in more detail your current medical conditions and property damage.

Sincerely,


KATHLEEN SMILEY

For the Firm

School Board and Onsite Litigation

- Kerr-McGee chose to cooperate in remediation rather than continuing legal fight.
- In 1999, Kerr-McGee, the School Board and onsite leaseholders reached agreement of remediation plans, subject to MDEQ approval.
- Onsite leaseholders agreed to deed restrictions, for which Kerr-McGee made payment.
- Kerr-McGee also agreed to pay for remediation.



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

October 3, 2001

Via Facsimile 601-545-4608

Mayor Johnny Dupree
Post Office Box 1898
Hattiesburg, MS 39403

Re: Kerr-McGee Chemical (Former Gulf States Creosote Site)

Dear Mayor Dupree:

This letter serves to confirm the meeting that was scheduled with your office by telephone on October 2, 2001. Mississippi Department of Environmental Quality (MDEQ) representatives requested a meeting with Mayor Dupree to brief the Mayor on the Kerr-McGee Chemical site and associated remediation plans.

This meeting is scheduled for Monday, October 29, 2001 at 10:00 a.m. and will be held in Hattiesburg at Mayor Dupree's office. Jerry Banks, Chief of the Hazardous Waste Division; Tony Russell, Chief of the Uncontrolled Sites Section; and Kelly Riley, Attorney, will be present at the meeting.

Thank you in advance for allowing us to meet with you to discuss the events surrounding the remediation plans for this site.

Sincerely,

Kelly R. Riley

Kelly R. Riley
Attorney

cc: Tony Russell
Jerry Banks



For Immediate Release

**Contact: Linda Vaught
(601) 961-5053**

MDEQ Updates Hattiesburg Officials on Local Hazardous Cleanup Sites

Jackson, Miss., February 5, 2004 – Mississippi Department of Environmental Quality (MDEQ) representatives met with Hattiesburg officials on Monday, February 2, to discuss various environmental issues in and around the Hattiesburg area.

The meeting with Mayor Johnny Dupree, City Councilwomen Deborah Denard and Betsy Rowell, and Supervisor Charles Marshall addressed activities at Davis Timber, Kerr McGee, and Hercules.

“We discussed the process and the progress at these sites as well as the anticipated plans of action,” said Gloria Tatum, MDEQ’s Environmental Justice Coordinator. “This was an information exchange that was requested by local officials. The city and county are valued partners in our efforts, and we are delighted to share information with them.”

MDEQ, in cooperation with the city, conducted a public meeting in October 2003 regarding the old Kerr McGee site to inform local citizens of the cleanup progress.

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**PROPOSED
CLEANUP PLANS
for the former Gulf
States Creosote
site in Hattiesburg**

november 2002

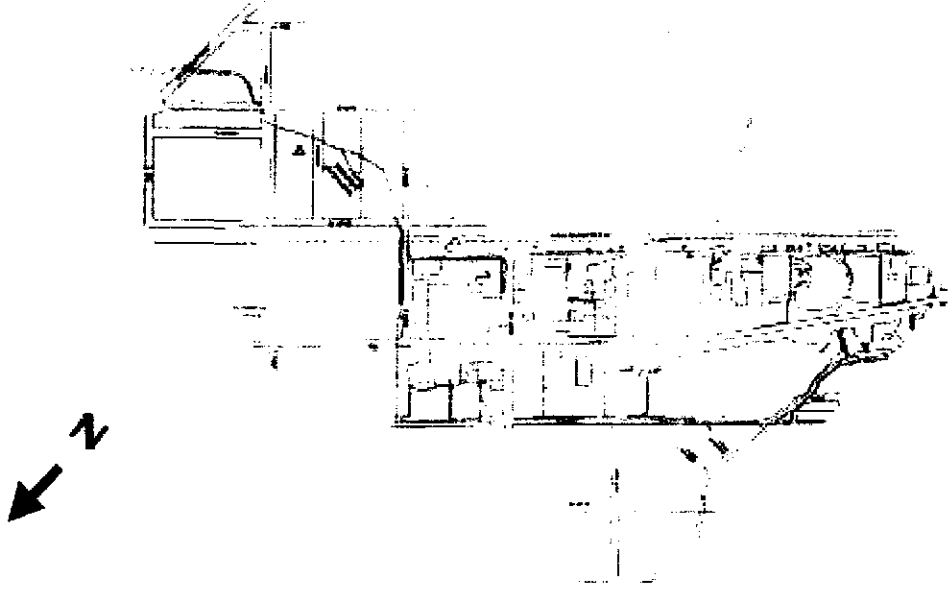
ENVIRONMENTAL QUALITY
Mississippi Department of Environmental Quality

MDEQ

land, and water through fair
and responsible regulation.



P.O. Box 10385
Jackson, MS 39289
http://www.mdeq.ms.us



If you have any additional questions,
please contact:

PAULY PERSINGER
Mississippi Department of Environmental Quality
Uncontrolled Sites Section
(601)961-5318

CHRISTINA TUCKER
Mississippi Department of Environmental Quality
Field Services Division
(601)961-5011

CHRIS RYAN
Mississippi Department of Environmental Quality
Legal Division
(601)961-5369

The Mississippi Department of Environmental Quality (MDEQ) is publishing this notice to inform the citizens of Hattiesburg and the surrounding area about the proposed cleanup of the former creosote plant located in and around Courtesy Motors on West Pine Street.

The former creosote plant operated from the early 1900's to approximately 1960. Since the plant operated prior to the creation of MDEQ, the agency never regulated this site. In 1962, the site was redeveloped for commercial and light industrial use.

Location #1: (see map on back)

Former Fill Area (between West Pine St. & Gordon's Creek)
Proposed Cleanup: Install sheet piling wall along the creek bank to eliminate seepage into the creek, install monitoring and recovery wells along the wall to monitor and recover any free product that may collect, install concrete culvert from West Pine Street to Creek, cover the area with a liner, and plant trees to prevent mounding of groundwater along the sheet-piling wall.

Location #2: (see map on back)

Former Process Area (between Scooba St. & Timothy Ln)
Proposed Cleanup: Remove creosote contaminated soil from the wooden substructure and the concrete sump area, backfill with compacted clay fill material, regrade the surface and cap the area with a liner and asphalt.

Location #3: (see map on back)

Southern Railroad Track Area
Proposed Cleanup: Remove creosote contaminated sediment and soils from within and beneath the drainage ditch. Depending on the effects of the integrity of the railroad tracks, the soils will either be capped in place or removed.

Location #4: (see map on back)

Northeast Ditch from Scooba Street to Katie Street
Proposed Cleanup: Remove contaminated sediment and soils, install a liner and sand bed in the ditch, install culvert and surface drains, and then backfill around culverts with clean soil.

Question 4. What is the possibility that contamination will continue to migrate in the future? *The remedies proposed should eliminate the possibility for migration in the fill area, process area, and drainage ditch.*

Question 5. How long will the remediation take place?
The remedies proposed for the process area and the fill area will be accomplished within one year. The remedy for the northeast drainage ditch may take more than one year due to size of the project and weather conditions.

Question 6. Does MDEQ know if the contaminants have migrated from the site to the soils in the residential yards in the area?
Soil samples have been collected in the residential area, and no contamination was found above the target remediation goal levels established by MDEQ.

Question 7. When the company begins the cleanup of the site, will this create exposure to residents in the area?
No. But there will be odors associated with the removal of contaminated soils from the process area and the Northeast drainage ditch. Citizens will not be exposed to harmful levels of contaminants from the site.

Question 8. What is being done about the creosote in Gordon's Creek?
MDEQ knows there are occasional seepages from the old fill area into Gordon's Creek, but an ecological assessment conducted by the Corp of Engineers indicated that there are no environmental impacts to the creek. A sheet-piling barrier wall will be installed to eliminate further discharges to the creek.

In an effort to address some of your concerns, MDEQ has listed answers to the most frequently asked questions about the proposed cleanup. If you have any other questions, please contact Tony Russell at (601) 961-5318.

Question 1. Has the City's drinking water been contaminated by creosote or other wood treating chemicals?
No. There is no threat to the City of Hattiesburg's drinking water supply, but MDEQ will require monitoring on a semi-annual basis for two years to watch for any possible migration of groundwater contamination. After two years, the monitoring will be performed on an annual basis for an indefinite period of time.

Question 2. Have the citizens or residents in the area been exposed to creosote contamination at the surface?
No. MDEQ is not aware of any direct exposure at this time. The limited amount of contamination that exists is below the surface. Although creosote contamination exists in the drainage ditch that runs from Scooba Street to Katie Street, there is no direct exposure because the contamination has been covered by sediment that has been deposited over time.

Question 3. How does MDEQ know that the shallow groundwater contamination will not impact the City of Hattiesburg's drinking water supply or a private well?
Extensive groundwater monitoring will allow MDEQ to watch the location of the groundwater contamination and ensure that any migration does not threaten drinking water in the area. A private water well search was conducted in October 2000 in the residential area surrounding the site, and no private wells were identified. Also, the City of Hattiesburg has an ordinance that prohibits the drilling of private wells within the city limits.

**STATUS of
CLEANUP ACTIVITY
for the former Gulf
States Creosote
site in Hattiesburg**

October 2003

ENVIRONMENTAL QUALITY

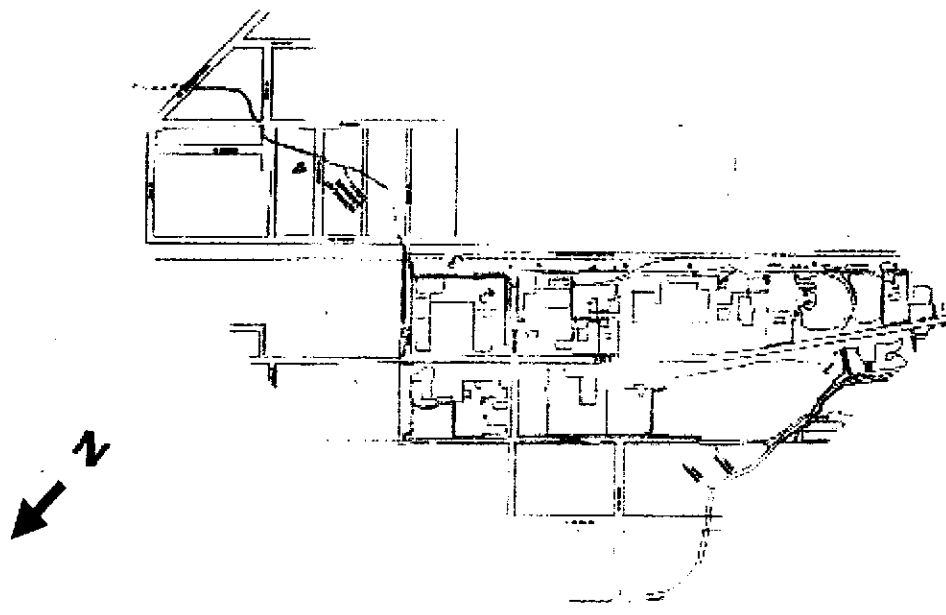
Mississippi
Department

MDEQ

Protect Mississippi's air,
land, and water through fair
and responsible regulation.



P.O. Box 10885
Jackson, MS 39208-0885
www.mdeq.state.ms.us



If you have any additional questions,
please contact:

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
Assessment and Remediation Branch
(601)961-5318

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
Field Services Division
(601)961-5011

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
Legal Division
(601)961-5369

The Mississippi Department of Environmental Quality (MDEQ) is publishing this fact sheet to inform the citizens of Hattiesburg and the surrounding area about the status of cleanup activities at the former creosote plant located in and around Courtesy Motors on West Pine Street.

The former creosote plant operated from the early 1900's to approximately 1960. The contamination at the former Gulf States Creosote site occurred prior to 1960, long before the creation of the Mississippi Department of Environmental Quality. In 1962, the site was redeveloped for commercial and light industrial use.

YELLOW TEXT indicates work completed

Location #1

Former Fill Area

Proposed Cleanup: Install sheet piling wall along the creek bank to eliminate seepage into the creek, install monitoring and recovery wells along the wall to monitor and recover any free product that may collect, install concrete culvert from West Pine Street to Creek, cover the area with a liner, and plant trees to prevent mounding of groundwater along the sheet-piling wall.

Location #2

Former Process Area

Proposed Cleanup: Remove creosote contaminated soil from the wooden substructure and the concrete sump area, backfill with compacted clay fill material, regrade the surface and cap the area with a liner and asphalt.

Location #3

Southern Railroad Track Area

Proposed Cleanup: Remove creosote contaminated sediment and soils from within and beneath the drainage ditch. Depending on the effects on the integrity of the railroad tracks, the soils will either be capped in place or removed.

Location #4

Northeast Ditch from Scooba Street to Kattie Street

Proposed Cleanup: Remove contaminated sediment and soils, install a liner and sand bed in the ditch, install culvert and surface drains, and then backfill around culverts with clean soil. The drainage ditch project is complete except for replacing the culverts beneath Martin Luther King Avenue, Florence Avenue and Eastside Avenue, and completing inlet boxes, grading and seeding. Additional potential areas of concern along the drainage ditch have been identified and will be assessed and remediated over the next few months as needed.

In an effort to answer your questions, MDEQ has listed answers to the most frequently asked questions about the proposed cleanup. If you have any other questions, please contact Tony Russell at (601) 961-5318.

Question 1. Will the City's drinking water be contaminated by the contamination in the shallow water table?

No. There is approximately 150 to 200 feet of Hattiesburg Clay between the contaminated shallow water table and drinking water. The City of Hattiesburg's wells are screened in the Catahoula Formation. The Catahoula Formation is a geologic formation, approximately 660 feet thick, that extends from 530 feet to 1190 feet below ground surface, from which the City of Hattiesburg obtains its drinking water.

Question 2. Is the soil that is stockpiled along the drainage ditch contaminated? No. This soil came from either clean areas of the drainage ditch or from areas outside the drainage ditch pathway and will be used for backfill. When installing the larger drainage pipe, a lot of excess soil was generated from the excavations. This non-contaminated soil was stockpiled until needed for backfill.



Question 3. What happened to the excavated contaminated soil from the drainage ditch? All the contaminated soil was loaded directly into trucks for disposal and sent to permitted landfills. Each truck that leaves the site is covered to

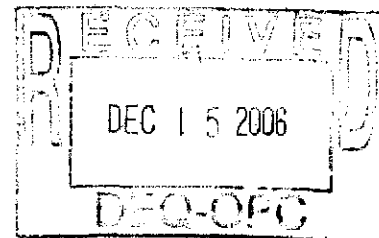


further insure that soil is not spilled enroute to the landfill.

Question 4. Is dust a concern? The Health and Safety Plan requires that the dust be controlled. The only dust noticed during the unannounced site inspections was on Martin Luther King Drive where vehicle traffic was stirring up dust. The dust is generated from truck traffic across the non-contaminated soil that is being brought in as backfill material. The soil excavated from the ditch is moist and is being loaded directly into covered trucks for disposal. Even though the dust is from non-contaminated soil, the area is being sprayed with water from the City's potable water supply system to minimize the nuisance effect caused by the dust.

Question 5. Is air pollution a concern? No. The air is being monitored as required in the Health and Safety Plan for both the process area and the drainage ditch removal projects. There are both stationary and mobile units being used for monitoring purposes. The readings are being documented on a daily basis and recorded in a permanent file as required in the Health and Safety Plan. There are odors associated with the creosote as it is removed, but none of the permissible exposure limits for the creosote compounds have been exceeded in the work zone. Therefore, although workers and residents may smell the creosote as it is excavated, there is no associated health risk because the air is being closely monitored.

MICHAEL PISANI & ASSOCIATES, INC.
Environmental Management and Engineering Services



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1100 Poydras Street
1430 Energy Centre
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18163 East Petroleum Drive
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Baton Rouge, Louisiana 70809
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cmfetters@ix.netcom.com

December 14, 2006

Mr. Tony Russell
Assessment Remediation Branch
MDEQ Office of Pollution Control
101 Capitol Centre
101 W. Capitol Street
Jackson, MS 39201

Re: *2005 Ground Water Monitoring Report*
Summary of 2005 DNAPL Recovery Activities – Gordon's Creek Fill Area
Former Gulf States Creosoting Site
Hattiesburg, Mississippi

Dear Mr. Russell:

Enclosed for your files are two copies of each of the referenced documents. As we have discussed, we have scheduled the next ground water monitoring event for the week of January 8, 2007. After the holidays, we will forward you a schedule for quarterly Fill Area gauging and recovery events in 2007.

Should you have any questions or wish to discuss either of the enclosed documents, please contact me.

Sincerely,

MICHAEL PISANI & ASSOCIATES, INC.

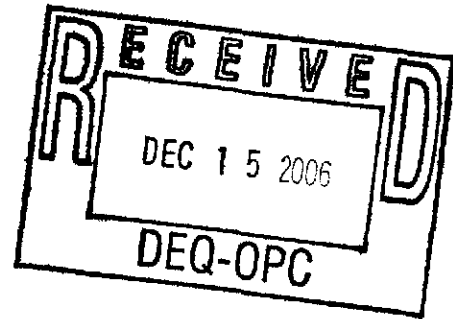
A handwritten signature in black ink, appearing to read "DCU", written over a large, stylized circular scribble.

David C. Uptegrove, P.G.

cc: Keith Watson – Tronox

**Summary of 2005 DNAPL Recovery Activities
Gordon's Creek Fill Area
December 14, 2006**

**Former Gulf States Creosoting Site
Hattiesburg, Mississippi**



DNAPL Monitoring and Recovery System

In late 2003, Michael Pisani & Associates (MP&A) installed a system of 17 recovery wells (FARW-01 through FARW-17) behind the Waterloo Barrier at the western edge of the Gordon's Creek Fill Area containment area (the barrier now forms the eastern bank of the creek adjacent to the containment area). The recovery wells were installed at 25-foot intervals to allow for the collection and removal of dense non-aqueous phase liquids (DNAPLs) accumulating behind the barrier, where present. MP&A also installed 12 monitoring wells (FAMW-01 through FAMW-12) at 50-foot intervals to monitor for the presence of DNAPLs at the contact between the Fill Area sands and the underlying Hattiesburg clay.

The locations of Fill Area monitoring and recovery wells are shown on attached Figure 1. Well completion information is summarized in Table 1.

DNAPL Gauging and Recovery Operations

In the spring of 2004, a concrete road was constructed along the top of the Waterloo Barrier. The construction of this road was necessary to access the recovery and monitoring wells during wet weather conditions. Shortly thereafter, in May 2004, Kerr-McGee Chemical (now Tronox) began to gauge and recover DNAPL from the system on a monthly basis. In early 2005, MDEQ approved a decrease in gauging and recovery frequency from monthly to quarterly.

Regular procedures for DNAPL gauging and recovery are as follows:

- Remove manhole covers and well caps.
- Measure the depth to water level from top of casing in each recovery and monitoring well using an electronic water level indicator.
- Check for the presence of DNAPL in each recovery and monitoring well using weighted cotton string.
- If wells contain measurable free product (i.e., 0.1 foot or more), install copper drop tubes extending from the base of each recovery well to land surface. Drop tubes are connected directly to silicon tubing to allow recovery of DNAPL using a peristaltic pump.
- Pump all recovery wells containing free DNAPL (either measurable or trace amounts) into sealable containers. Wells are pumped until only a sheen is present.
- Transport product/water mixture to Tronox's Columbus, Mississippi recovery system for recycle/reuse.

**Summary of 2005 DNAPL Recovery Activities
Gordon's Creek Fill Area
December 14, 2006**

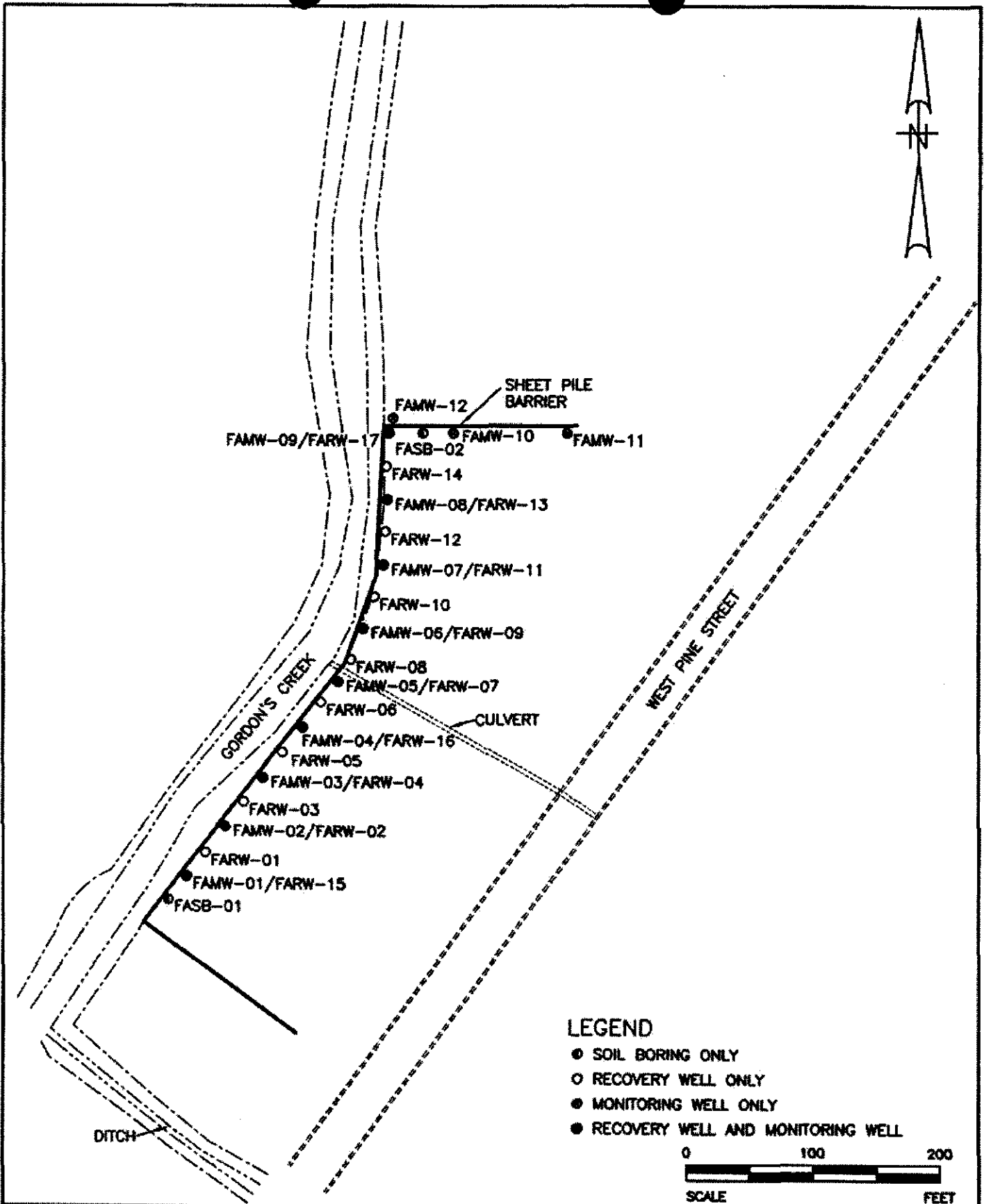
**Former Gulf States Creosoting Site
Hattiesburg, Mississippi**

Summary of Gauging and Recovery Activities to Date

Tronox conducted quarterly well gauging and DNAPL recovery at the Gordon's Creek Fill Area (the Fill Area) in 2005. The results of well gauging and recovery are summarized in Tables 2 through 4. To date, measurable DNAPL (i.e., 0.1 foot or more) has been encountered in four recovery wells: FARW-04, FARW-06, FARW-08 and FARW-10. As shown on Table 4, a total of 2.25 gallons of DNAPL was removed from the system in 2005.

Future Gauging and Recovery

Tronox will continue to gauge and recover DNAPLs in monitoring and recovery wells on a quarterly basis and will coordinate all gauging and recovery events with MDEQ as far in advance as possible. In the future, Tronox will submit annual reports summarizing the results of gauging and recovery activities no later than March 1 of the following year.



MICHAEL PISANI & ASSOCIATES
 Environmental Management and Engineering Services
 New Orleans, Louisiana Houston, Texas

SCALE: 1"=100' DWG. NO.: 21-04/322A

FIGURE 1
RECOVERY WELL AND MONITORING WELL LOCATIONS
FILL AREA

FORMER GULF STATES CREOSOTING SITE
NATTIESBURG, MISSISSIPPI

Table 1

**Well Completion Data
Fill Area Gauging and Recovery Project**

**Former Gulf States Creosoting Site
Hattiesburg, Mississippi**

Well #	Installation Date	Construction Materials	Distance from Upstream Wingwall (ft.)	Boring Depth	Screened Interval	Depth to	Depth to
						Top of Filter Pack	Top of Bentonite Seal
FAMW-01	11/3/2003	2" PVC	50	28.0	21.3-26.3	19.0	17.0
FAMW-02	11/4/2003	2" PVC	100	26.0	19.0-24.0	17.0	15.0
FAMW-03	11/4/2003	2" PVC	150	24.0	17.0-22.0	15.0	13.0
FAMW-04	11/4/2003	2" PVC	200	24.0	17.0-22.0	15.0	13.0
FAMW-05	11/6/2003	2" PVC	250	24.0	18.0-23.0	16.0	14.0
FAMW-06	11/4/2003	2" PVC	300	22.0	16.0-21.0	14.0	12.0
FAMW-07	11/6/2003	2" PVC	350	24.0	18.0-23.0	16.0	14.0
FAMW-08	11/6/2003	2" PVC	400	22.0	16.0-21.0	14.0	12.0
FAMW-09	11/5/2003	2" PVC	450	22.0	16.0-21.0	14.0	12.0
FAMW-10	11/5/2003	2" PVC	Wing Wall	24.0	18.0-23.0	16.0	14.0
FAMW-11	11/5/2003	2" PVC	Wing Wall	28.0	22.5-27.5	20.5	18.5
FAMW-12	11/5/2003	2" PVC	Outside WW	22.0	16.0-21.0	14.0	12.0
FARW-01	11/7/2003	4" SS	75	10.0	5.0-10.0	4.0	3.5
FARW-02	11/7/2003	4" SS	100	12.0	5.0-10.0	4.0	3.5
FARW-03	11/7/2003	4" SS	125	12.0	6.5-11.5	5.5	4.5
FARW-04	11/10/2003	4" SS	150	12.0	6.5-11.5	5.5	4.5
FARW-05	11/10/2003	4" SS	175	12.0	6.5-11.5	5.5	4.5
FARW-06	11/10/2003	4" SS	225	12.0	6.0-11.0	5.0	4.0
FARW-07	11/10/2003	4" SS	250	13.5	8.5-13.5	6.5	4.5
FARW-08	11/10/2003	4" SS	275	12.0	6.0-11.0	5.0	4.0
FARW-09	11/11/2003	4" SS	300	10.5	5.5-10.5	4.5	3.5
FARW-10	11/11/2003	4" SS	325	24.0	6.0-21.0	5.0	4.0
FARW-11	11/12/2003	4" SS	350	22.0	7.0-22.0	5.0	4.0
FARW-12	11/11/2003	4" SS	375	14.0	3.0-8.0	2.5	2.0
FARW-13	11/12/2003	4" SS	400	10.5	5.5-10.5	4.5	3.5
FARW-14	11/12/2003	4" SS	425	10.0	5.0-10.0	4.0	3.5
FARW-15	11/20/2003	4" SS	50	9.0	4.0-9.0	3.0	2.0
FARW-16	11/20/2003	4" SS	200	8.5	3.5-8.5	3.0	2.0
FARW-17	11/20/2003	4" SS	450	8.5	3.5-8.5	3.0	2.0

Note:

All depths are reported in feet below land surface.

Table 2

Water Levels
 Fill Area Gauging and Recovery Project
 Former Gulf States Creosoting Site
 Hattiesburg, Mississippi

Well #	Date										
	5/13/04	6/15/04	7/27/04	8/23/04	9/20/04	10/18/04	12/1/04	3/31/05	6/7/05	10/24/05	12/13/05
FAMW-01	5.17	4.41	2.88	3.24	3.40	3.29	3.00	3.52	4.18	NM	NM
FAMW-02	3.93	3.32	2.90	3.30	3.34	3.37	3.01	3.05	2.98	3.90	4.01
FAMW-03	3.97	3.25	2.34	2.74	2.95	3.00	2.50	2.90	2.99	NM	NM
FAMW-04	3.42	2.96	1.89	1.75	2.20	2.33	1.67	1.83	1.93	NM	NM
FAMW-05	2.79	2.46	2.02	2.03	2.43	2.95	2.12	2.05	1.01	NM	NM
FAMW-06	2.75	2.10	2.00	2.38	2.69	2.99	2.48	2.35	1.23	2.45	2.84
FAMW-07	2.37	2.30	2.17	2.37	2.87	3.02	2.54	2.69	1.53	3.27	3.40
FAMW-08	2.88	2.42	2.46	2.58	2.87	3.25	2.94	3.03	1.69	3.27	3.52
FAMW-09	3.53	3.12	4.83	5.42	5.86	6.20	5.88	4.92	1.95	3.59	3.97
FAMW-10	6.18	5.31	9.90	7.55	8.00	8.34	8.13	7.64	5.88	NM	NM
FAMW-11	8.25	7.30	9.06	6.29	6.79	6.90	6.60	8.40	9.94	8.68	9.14
FAMW-12	6.24	6.14	4.05	4.40	4.62	4.61	4.20	6.43	9.15	7.09	10.22
FARW-01	3.16	2.50	2.04	2.52	2.67	2.74	1.25	1.41	1.16	3.21	2.89
FARW-02	2.03	1.49	1.87	1.52	1.70	1.72	0.04	0.32	0.18	2.40	1.92
FARW-03	2.63	1.38	0.75	1.40	1.40	1.42	1.10	0.89	0.49	2.15	2.01
FARW-04	2.60	1.80	1.99	1.53	1.47	1.50	1.46	1.39	0.30	1.68	2.78
FARW-05	2.29	1.45	0.99	1.67	1.69	1.96	0.81	0.93	0.21	0.70	2.72
FARW-06	1.78	0.98	0.60	1.10	1.35	1.40	0.75	0.71	0.00	1.95	1.72
FARW-07	2.15	1.34	0.10	1.29	1.63	1.68	0.88	0.69	0.49	2.27	2.10
FARW-08	2.34	1.81	1.68	1.80	2.15	2.03	1.41	1.52	1.00	2.67	2.48
FARW-09	2.69	2.31	2.19	2.00	2.12	2.58	2.00	1.93	1.33	2.65	2.60
FARW-10	2.42	1.87	1.68	1.79	2.26	2.44	1.72	1.54	1.12	2.86	2.85
FARW-11	2.37	1.78	1.38	1.84	2.04	2.39	1.87	1.90	1.10	2.70	2.87
FARW-12	3.07	0.04	0.20	0.03	0.77	0.85	0.89	0.76	0.00	1.60	0.67
FARW-13	0.10	0.01	0.05	0.01	1.12	1.35	0.71	0.21	0.00	1.54	1.45
FARW-14	1.35	0.95	0.56	0.70	0.89	1.10	1.03	0.34	0.00	1.33	1.03
FARW-15	3.38	2.64	2.04	2.51	2.65	2.62	1.35	2.43	1.15	3.20	2.91
FARW-16	1.50	1.19	1.22	1.50	1.60	1.63	0.05	0.33	0.41	3.00	2.00
FARW-17	0.98	0.90	0.74	0.50	0.83	0.90	0.31	0.77	0.00	1.49	1.00

Note:
 Water levels are reported in feet below top of casing.
 NM - water level not measured during this event.

Table 3
Ground Water Elevations
Fill Area Gauging and Recovery Project

Former Gulf States Creosoting Site
Hattiesburg, Mississippi

Well #	TOC Elev.	Date											
		5/13/04	6/15/04	7/27/04	8/23/04	9/20/04	10/18/04	12/1/04	3/31/05	6/7/05	10/24/05	12/13/05	
FAMW-01	183.90	178.73	179.49	181.02	180.66	180.50	180.61	180.90	180.38	179.72	NM	NM	
FAMW-02	182.72	178.79	179.40	179.82	179.42	179.38	179.35	179.71	179.67	179.74	178.82	178.71	
FAMW-03	182.78	178.81	179.53	180.44	180.04	179.83	179.78	180.28	179.88	179.79	NM	NM	
FAMW-04	182.72	179.30	179.76	180.83	180.97	180.52	180.39	181.05	180.89	180.79	NM	NM	
FAMW-05	181.99	179.20	179.53	179.97	179.96	179.56	179.04	179.87	179.94	180.98	NM	NM	
FAMW-06	181.64	178.89	179.54	179.64	179.26	178.95	178.65	179.16	179.29	180.41	179.19	178.80	
FAMW-07	181.75	179.38	179.45	179.58	179.38	179.03	178.73	179.21	179.06	180.22	178.47	178.35	
FAMW-08	181.74	178.86	179.32	179.28	179.16	178.87	178.49	178.80	178.71	180.05	178.47	178.22	
FAMW-09	181.93	178.40	178.81	177.10	176.51	176.07	175.73	176.05	177.01	179.98	178.34	177.96	
FAMW-10	184.43	178.25	179.12	174.53	176.88	176.43	176.09	176.30	176.79	178.55	NM	NM	
FAMW-11	186.11	177.86	178.81	177.05	179.82	179.32	179.21	179.51	177.71	176.17	177.43	176.97	
FAMW-12	182.96	176.72	176.82	178.91	178.56	178.34	178.35	178.76	176.53	173.81	175.87	172.74	
FARW-01	183.74	180.58	181.24	181.70	181.22	181.07	181.00	182.49	182.33	182.58	180.53	180.85	
FARW-02	182.77	180.74	181.28	180.90	181.25	181.07	181.05	182.73	182.45	182.59	180.37	180.85	
FARW-03	182.30	179.67	180.92	181.55	180.90	180.90	180.88	181.20	181.41	181.81	180.15	180.29	
FARW-04	182.35	179.75	180.55	180.36	180.82	180.88	180.85	180.89	180.96	182.05	180.67	179.57	
FARW-05	182.36	180.07	180.91	181.37	180.69	180.67	180.40	181.55	181.43	182.15	181.66	179.64	
FARW-06	181.51	179.73	180.53	180.91	180.41	180.16	180.11	180.76	180.80	181.51	179.56	179.79	
FARW-07	181.53	179.38	180.19	181.43	180.24	179.90	179.85	180.65	180.84	181.04	179.26	179.43	
FARW-08	181.33	178.99	179.52	179.65	179.53	179.18	179.30	179.92	179.81	180.33	178.66	178.85	
FARW-09	181.23	178.54	178.92	179.04	179.23	179.11	178.65	179.23	179.30	179.90	178.58	178.63	
FARW-10	181.40	178.98	179.53	179.72	179.61	179.14	178.96	179.68	179.86	180.28	178.54	178.55	
FARW-11	181.14	178.77	179.36	179.76	179.30	179.10	178.75	179.27	179.24	180.04	178.44	178.27	
FARW-12	181.22	178.15	181.18	181.02	181.19	180.45	180.37	180.33	180.46	181.22	179.62	180.55	
FARW-13	181.29	181.19	181.28	181.24	181.28	180.17	179.94	180.58	181.08	181.29	179.75	179.84	
FARW-14	181.30	179.95	180.35	180.74	180.60	180.41	180.20	181.27	180.96	181.30	179.97	180.27	
FARW-15	183.78	180.40	181.14	181.74	181.27	181.13	181.16	182.43	181.35	182.63	180.58	180.87	
FARW-16	182.58	181.08	181.39	181.36	181.08	180.98	180.95	182.53	182.25	182.17	179.58	180.58	
FARW-17	181.33	180.35	180.43	180.59	180.83	180.50	180.43	181.02	180.56	181.33	179.84	180.33	

Note:
Ground water elevations are reported in feet above mean sea level.
NM - water level not measured during this event.

Table 4

Product Measurements
Fill Area Gauging and Recovery Project
Former Gulf States Creosoting Site
Hattiesburg, Mississippi

Well #	Date										Product Recovered (gals)				
	5/13/04	6/15/04	7/27/04	8/23/04	9/20/04	10/18/04	12/1/04	3/31/05	6/7/05	10/24/05		12/13/05			
FAMW-01	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	NM	Clean	NM
FAMW-02	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-03	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-04	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-05	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-06	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-07	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-08	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-09	Clean	Clean (a)	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-10	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-11	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-12	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-13	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-14	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-15	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-16	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FAMW-17	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-01	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-02	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-03	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-04	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-05	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-06	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-07	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-08	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-09	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-10	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-11	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-12	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-13	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-14	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-15	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-16	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean
FARW-17	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean	Clean

Product

Recovered (gals)

0.25

0.25

0.5

0.5

0.25

0.25

0.5

1.25

0.25

0.25

0.5

1.25

1

0.25

Note:

Product thickness is reported in feet, where present.

(a) Sheen reported

NM - product thickness not measured during this event, but not present in the past.

United States Senate

WASHINGTON, DC 20510-2402

COMMITTEE ON
APPROPRIATIONS
CHAIRMAN

COMMITTEE ON
AGRICULTURE, NUTRITION,
AND FORESTRY

COMMITTEE ON
RULES AND
ADMINISTRATION

December 5, 2006

Please reply to:
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125
(601) 965-4459
(601) 965-4919 Telefax



Mr. Charles H. Chisolm
Executive Director
Mississippi Dept. of Environmental Quality
Office of Geology
Post Office Box 20307
Jackson, Mississippi 39289-1307

Dear Mr. Chisolm:

Enclosed is a response from Department of Justice officials regarding the Forrest County Environmental Support Team. You will see they advised that your agency is the best to deal with the Team's concerns.

I have contacted you regarding this case before. If you have questions or need further information from me, please call Kim Coalter in my Jackson office at 601-965-4459. She is very familiar with this situation and will be happy to speak with you. Kim will be leaving for Christmas vacation soon, so please call her by the end of this week if you need her assistance.

As a courtesy to me, I would appreciate a written response at your earliest convenience. Any assistance you can provide in this matter would be deeply appreciated. I hope you have a wonderful holiday season.

Sincerely,

A handwritten signature in black ink, appearing to read "Thad".

THAD COCHRAN
United States Senator

TC/kc

Enclosure



U.S. Department of Justice

Office of Legislative Affairs

Assistant Attorney General

Washington, D.C. 20530

November 15, 2006

The Honorable Thad Cochran
United States Senator
188 East Capitol Street, Suite 614
Jackson, MS 39201-2125

Dear Senator Cochran:

This responds to your letter of September 18, 2006, concerning creosote contamination at the Gulf States Site located in Hattiesburg, Mississippi (creosote site) and the interest of the Forrest County Environmental Support Team in this matter.

The Environment and Natural Resources Division at the U.S. Department of Justice is responsible for, among other things, enforcing the federal environmental laws by means of cases referred to it by various federal agencies. We have given your letter and the attached materials to the Environment Division for its review. The Environment Division has had no involvement with respect to the creosote site. Its review of the information your office provided to this Department revealed that the U.S. Environmental Protection Agency (EPA) has evaluated the creosote site and determined that it did not qualify for federal action under the Superfund law, and should be addressed by the Mississippi Department of Environmental Quality (MDEQ).

EPA has confirmed to the Environment Division that MDEQ remains the agency that has primary responsibility for the creosote site. Under these circumstances, the Department of Justice is not in a position to evaluate the nature of the cleanup that is taking place or determine whether there have been violations of federal environmental laws.

If we can be of further assistance on this or any other matter, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script that reads "James H. Clinger".

James H. Clinger
Acting Assistant Attorney General

TRONOX

Name A. Keith Watson
Title Project Manager

Phone 405-775-5475
Fax 405-775-6563
e-mail Keith.Watson@Tronox.com

November 7, 2006

Tony Russell, Chief
Mississippi Department of Environmental Quality
Assessment Remediation Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Re: Gulf States Creosote Site
Northeast Drainage Ditch Project
Hattiesburg, Mississippi

Dear Mr. Russell:

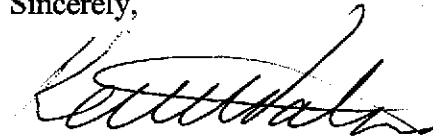
Pursuant to the request of the Mississippi Department of Environmental Quality in the letter dated December 21, 2004, Tronox LLC is providing this updated status report regarding access to those parcels of land that may require further attention pursuant to the MDEQ-approved Work Plan for the Northeast Drainage Ditch.

The Woods property. Tronox is actively negotiating with Mrs. Woods; through a local politician who is acting as her representative. Discussions have been productive and we expect negotiations to be successfully completed by yearend.

The Norfolk Southern Railroad (NSRR) right-of-way. In lieu of the MDEQ decision on the risk assessment methodology provided in an email of 2/21/06, Tronox may need to modify the remedial design for this property. We are currently evaluating options and will soon discuss these with MDEQ. Then, Tronox and NSRR can intelligently discuss access requirements.

We appreciate your attention and assistance towards completion of the Northeast Drainage Ditch Work Plan. If you have any questions or comments, please call me at (405) 775-5475.

Sincerely,



A. Keith Watson
Project Manager

Copy: N. Bock
M. Cunningham/E. Hurst

Tronox LLC

123 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102 • P.O. Box 268859, Oklahoma City, Oklahoma 73126-8859



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

MEMORANDUM

TO: Gulf States Creosote Site File
Hattiesburg, MS
FROM: Tony Russell *DWR 9/19/06*
DATE: September 15, 2006
SUBJECT: Removal of Contaminated Soil

I met with Dave Upthegrove (Michael Pissani & Associates) on September 8, 2006 to observe the removal of contaminated soil.

September 8: Bevon Property – Two joints of concrete culvert were removed so the down-gradient end of the culvert could be sealed. Bags of quick-crete were laid in the end of the pipe to form a wall and then wet with water. Concrete would be pumped into the up-gradient end of the pipe on American Legion property. Channel 7 news crew showed up and took some footage of the areas being worked on for a news story that evening.

Once the restaurant had shut down at 2 pm, demolition crew moved to American Legion property and began removing the contaminated soil from the old drainage ditch between Eastside Avenue and the building. The removal was initiated but not completed. The excavation was roped off for the night.

September 9: American Legion Property – upon returning to the site Saturday morning, the concrete pipe was pumped full of concrete to seal off the culvert beneath the buildings. Creosote was not observed in the culverts during the removal. Once the culvert beneath the buildings was sealed, the remaining contaminated soil was removed from the old drainage ditch. Upon removal of all contaminated soil, the hole was back filled with clean material and compacted. The excavated area was then roped off.

September 11 – Bevon Property/American Legion Property – the demolition crew began removal of the remaining concrete culverts and contaminated soil on Monday. Upon removal of the contaminated soil, some of the excavated area was back filled with clean material and compacted. Once the restaurant shut down at 2 pm, the remaining depth (6 inches) was filled and compacted with asphalt.

September 12 – Bevon & McCarthy Property – the back filling of the old drainage ditch excavation was completed on Tuesday. A small area (10 x 10 x 1 foot) was excavated on the McCarthy property, which is down gradient of the Woods property. Upon

removal of the soil, the area was back filled.

A Japanese pop-corn tree roots were dug during the removal of concrete culvert on Bevon property. Contractor recommended that the tree be removed and the property owner (Bevon) gave them permission. The tree would have to be removed by a tree surgeon due to the size of the tree.

Pictures were taken during the removal of contaminated soil.



"Dave Upthegrove"
<dupthegrove@ix.netcom.com>
m>
09/01/2006 09:34 AM

To "Watson, Keith" <Keith.Watson@tronox.com>, "Bock, Nick"
<Nick.Bock@tronox.com>, "Cunningham, Myron"
<Myron.Cunningham@tronox.com>,
cc <Tony_Russell@deq.state.ms.us>, "Corey Milton"
<cmilton@netdoor.com>
bcc

Subject RE: Hattiesburg - McDougal work

Per Nick's instructions, I called Ms. McDougal yesterday to inform her we were able to reschedule the work on her property for Friday afternoon and Saturday, September 8 and 9. I told her we plan to remove the accessible pipe and underlying affected soil, cement the culvert beneath the existing buildings, and backfill and compact the excavation over the weekend. We will return first thing Monday morning and asphalt patch the backfilled area; we will need to barricade the patched area for a day while the asphalt sets, but that should not affect her operations as there is plenty of other parking at that intersection to accommodate her customers. After we've completed the work on her parking lot, we will move over to complete the work on the Bevon and McCarthy properties.

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)
dupthegrove@ix.netcom.com

From: Dave Upthegrove [mailto:dupthegrove@ix.netcom.com]
Sent: Wednesday, August 30, 2006 12:53 PM
To: 'Watson, Keith'; 'Bock, Nick'; 'Cunningham, Myron'; 'dshandy@ryanwhaley.com'; 'Dickerson, L'
Subject: Hattiesburg - McDougal work

Pearlie McDougal returned my call this morning. She expressed her desire that the work in the Down Home Cookin' parking lot be performed during non-operational hours (i.e., between 2 pm on Friday and 11 am Monday). I told her that I'd discuss this with Tronox and that someone would get back with her (her cell # is 601/270-4532).

I have spoken with both Singley Construction and Tony Russell of Mississippi DEQ regarding performing the work beginning as soon as Down Home closes on September 8. Both Singley and Tony are available and we all agreed that we should be able to remove the pipe and affected soil, pump grout into the culvert to be abandoned in place (i.e., the 115' under existing buildings) and backfill the excavation with compacted soil by Saturday evening. We would need to patch the asphalt pavement first thing Monday morning, but that could be done before the restaurant opens and would only necessitate closure of a small portion of the lot (i.e., 2 to 3 parking spaces) until the asphalt cools and sets up.

As soon as we've patched the Down Home parking lot, we'll move our equipment to perform the work on the Bevon and McCarthy properties. Once those are completed, the only unremediated segment of the northeast drainage ditch east of the railroad tracks will be the property at 106 Scooba Street.

Please let me know if I should call Ms. McDougal or if someone from Tronox will. We appreciate the opportunity to assist Tronox with this project.



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

FILE COPY

August 25, 2006

**Honorable Thad Cochran
United States Senate
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125**

Dear Senator Cochran:

**Re: Kerr-McGee(Tronox) Site
Hattiesburg, Mississippi**

The purpose of this letter is to provide you a response to your letter of May 31, 2006 regarding Mississippi Department of Environmental Quality's (MDEQ) involvement in the remediation of the Kerr-McGee (Tronox) site located in Hattiesburg, Mississippi. The Department's responsibility in this matter was to approve a Remedial Action Work Plan and to provide oversight for the remediation of the contaminated property in order to provide continued protection of the environment and the public from contaminants on and around the site.

The original company (Gulf States Creosote Company) began wood treating operations around 1920. The company continued to operate until around 1960 or 1961 when it was closed and demolished. The company changed hands several times and in August 1974 became the ownership of Kerr-McGee Chemical Corporation when they merged with Moss American, Inc. The agency first became aware of the site in 1989 when the Corps of Engineers was conducting activities along Gordon Creek in connection with a flood control project. It should be noted that the site is on 16th Section Land and that the City of Hattiesburg and the Hattiesburg School District were notified of the contamination found in Gordon's Creek. Over the next several years MDEQ and the U.S. Environmental Protection Agency (USEPA) conducted several investigations of the site and began the process of determining if there was a company or individual that could be held responsible

OFFICE OF POLLUTION CONTROL

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for the contamination and the needed remediation of the site. These investigations provided the basis for a Hazard Ranking System (HRS) score to determine if further action was necessary under CERCLA (Comprehensive Environmental Response, Compensation and Liability Act), commonly known as the Superfund program. Factors evaluated include level of contamination, extent of contamination, toxicity and bio-accumulation potential of contaminants, population and land use, drinking water sources, and more. Sites with numerical scores greater than 28.5 are then recommended for placement on the National Priorities List (NPL). NPL sites are those which are typically referred to as Superfund Sites and which are then cleaned up through either the use of the Superfund or, preferably, through legal action which requires the Potentially Responsible Party (PRP) to conduct the cleanup. The inability of a site to obtain a sufficient score for HRS ranking does not mean the site may not pose a concern to local residents or state and local governments. The former Gulf States Creosote site, which is of concern to you, did not score greater than 28.5, and so was not recommended for placement on the NPL.

The site was then referred to the EPA Emergency Response and Removal Program (ERRB) to determine if any immediate action was necessary. ERRB assessed the property, in conjunction with ATSDR, and determined that the site was of low priority for a removal action and should be addressed by MDEQ.

In early 1994 we received a copy of a formal complaint made by the Hattiesburg Public School District against Kerr-McGee Chemical Company and Union Camp. During the period of 1993 to 1995 the Hattiesburg Public School District conducted several site investigations. In late December 1996 the MDEQ staff meet with Kerr-McGee representatives and their legal representatives with Kerr-McGee entering into our Voluntary Evaluation Program for site assessment and remediation and finalizing an Agreed Order with Kerr-McGee in January 1997 that provided for MDEQ to provide expedited review of site assessments, work plans, remediation plans, and other documents associated with the assessment and remediation of the site.

The next five years were spent conducting numerous investigations to determine the contaminants present, the extent of the contamination, and the development of a remediation plan for the site. In November 2002 the MDEQ held a public meeting in Hattiesburg to discuss the proposed remediation plan and to answer questions from the public about the proposed remediation. In October 2003 the MDEQ held another public meeting to discuss the status of the ongoing remediation of the site and to answer questions about the remaining remediation. The remediation of the site and surrounding impacted area has been completed except for five parcels of property as follows: 1) The property of Mr. Harris where the old drainage ditch from the site ran under his house and required remediation which is presently being completed. 2) The property of Mrs. Woods for which access has been denied. 3) A Down Home Cooking restaurant for which access has been denied. 4) A vacant piece of property next to Mrs. Woods for which access has been given. 5) A piece of

railroad right-of-way for which negotiations are ongoing for access. The MDEQ receives monthly reports from Kerr-McGee on their progress in negotiating access agreements to remediate these properties and we are told that they are nearing the end of their attempts to gain access to the properties. If their attempts to gain access fail then we will have to evaluate what actions that we can pursue to bring the remediation to a conclusion.

The MDEQ has strived, as always, through this entire process to assure that the environment and public are protected from the contaminants that are removed from the site and surrounding area by reviewing and approving the remediation plans submitted by the company. The MDEQ has provided approval of a remediation plan for the site and oversight of the remediation of this site in the same way as hundreds of sites that have already been remediated and in the same way as over a hundred sites that we are presently conducting oversight of remediation activities.

There are and have been numerous law suits brought against Kerr-McGee Chemical (Tronox) in United States District Court concerning the site regarding damages. MDEQ was not a party to the lawsuit but resolution of the case did hinge on approval of the remediation plan by MDEQ. Once approved, MDEQ and Kerr-McGee entered into an Agreed Order in which Kerr-McGee agreed to execute the cleanup plan as approved. MDEQ was not a party to any compensation paid as a result of the settlement. Again, our responsibility was to oversee the remediation of the site and surrounding area so that was protective of the environment and the public.

If I can be of further assistance or if you have further questions please call me at 601-961-5100.

Sincerely,



Jerry Cain, P.E.
Chief, Office of Pollution Control

K:/Common/Sprvisor/Tronox-Hattiesburg

United States Senate

WASHINGTON, DC 20510-2402

COMMITTEE ON
APPROPRIATIONS
CHAIRMAN

COMMITTEE ON
AGRICULTURE, NUTRITION,
AND FORESTRY

COMMITTEE ON
RULES AND
ADMINISTRATION

May 31, 2006

Please reply to:
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125
(601) 965-4459
(601) 965-4919 Telefax



Mr. Charles H. Chisolm
Executive Director
Mississippi Dept. of Environmental Quality
Office of Geology
Post Office Box 20307
Jackson, Mississippi 39289-1307

Dear Mr. Chisolm:

Enclosed is correspondence sent to me by my constituents regarding toxic conditions in Hattiesburg. My Jackson office staff members have also received quite a few phone calls regarding this issue. As a courtesy to me, I would appreciate a written response at your earliest convenience.

I have also forwarded this correspondence to Environmental Protection Agency officials. Any assistance you can provide in this matter would be deeply appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Thad".

THAD COCHRAN
United States Senator

TC/kc

Enclosure

Coalter, Kim (Cochran)

From: Liddell, James (Cochran)
Sent: Monday, May 15, 2006 4:44 PM
To: Coalter, Kim (Cochran)
Subject: FW: Kerr McGee Case
Attachments: 3029009596-Letter To mayor & Council.doc

James

From: Marcia Starks [mailto:msveneestarks41@yahoo.com]
Sent: Monday, May 15, 2006 4:35 PM
To: Liddell, James (Cochran)
Cc: Sherri jones
Subject: Kerr McGee Case

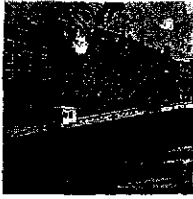
James, attached is a copy of the history of Kerr McGee. Please review with careful consideration the impact these chemicals has had on the residents here in Hattiesburg. We would like for the clean up process to stop until the EPA has a chance to come in and inspect the sites.

Should you have any more questions concerning this matter, please feel free to call Sherri Jones @ 601-441-4646 or me @ 205-370-8219. Again, thanks for your help in advance.

Sincerely,

Marcia Starks, Secretary
Forrest County Environmental Support Team (FCEST)

Yahoo! Messenger with Voice. PC-to-Phone calls for ridiculously low rates.



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003**

City of Hattiesburg
Mayor Johnny L. Dupree
Hattiesburg City Council
P. O. Box 1898
Hattiesburg, MS 39403

Dear Leaders:

RE: HISTORY OF KERR MCGEE

- 1989-Core of engineers notified MDEQ that they discovered creosote at 15 feet along Gordon Creek.
- 1993- MDEQ notified Hattiesburg public school district of their findings. Attorney J. B. Slack filed a law suit to protect the Hattiesburg public school district.
- 1996- J. B. notified the White Leaf Holders and filed to include them in the original state case.
- 1996- Kerr McGee filed to have the case dismissed on the grounds that the claim by the sub-lease holders was a duplicate claim of the school district and that the interest of the sub-lease holders were already being represented; if not, then the school district was not the proper party to bring the original action. Faced with the fact that all leaf holders should have been properly notified with this new discovery, the attorneys selected to change the style of the law suit and then used the name of a **private** business to file a new law suit. **All White Lease Holders** were properly notified and was allowed to participate in new action. Then they abandoned the state court case and directed their attention to federal court where they changed the name of the **lead plaintiff** to R.S.C.O. Realty Co. The records will reflect the Hattiesburg school district is tucked away all nice, quiet and cozy under private companies.

- 2002- Kerr McGee agreed to settle after tests and studies reflected that the remediation would venture well into the black community. In 2001, the records also reflect that the city became involved as a willing partner by obtaining easement and right a ways by advising the black residents that this was a ditch and drainage project that was being performed to prevent flooding and improve their community.
- 2002-2006- The black residents discovered the law suit in state court and filed to become a party. J. B. Slack filed to prevent the blacks from entering the state action, stating that the Black Leaf Holders should file their own separate action. Later, the Black Leaf Holders did so through attorneys Milton, Smiley, Cade, and Colom. This later proved to be a legal trap for the black residents that caused them to be locked in court while the whites attained a settlement using the **Black Lease Holders** properties as reflected in the work plan. The **Black Lease Holders** were never notified or allowed the right to due process. The need to notify the residents was removed in 2001 when the parties decided to use the city as a representative of the community. The City of Hattiesburg misled the **Black Lease Holders** by presenting this as a ditch and drainage project according to records. The only reason the city was solicited to become involved was to avoid notification and participation of the black property owners. This claim is supported by the fact that the city did not handle the other projects nor did the city handle a trust fund for the whites, nor did they obtain easements or right a ways from whites that leased property in the same state of Mississippi, in the same county of Forrest, and in the same city of Hattiesburg. The same 16 Section Property that all citizens pay taxes on has been segregated where white benefited and their properties have been restricted from being used as residential property. The minority leaf holders have been denied proper remediation. Previous records and the demolishing of the home of 116 Townsend, clearly proves that the black residents continue to be forced to live in an unsafe environment. We believe that the record will reflect that the Hattiesburg City Council has participated and allowed a double standard to be forced upon the minority tax payers and their community. We respectfully request that the city council immediately reposition itself and partnership with the community to resolve this matter.

Respectfully submitted,

Sherri Jones, Organizer
Forrest County Environmental Support Team

Coalter, Kim (Cochran)

From: Marcia Starks [msveneestarks41@yahoo.com]
Sent: Tuesday, May 16, 2006 10:59 AM
To: Coalter, Kim (Cochran)
Cc: Sherri Jones; Carolyn Jordan; Carolyn Reed
Subject: Letter to Senator Cochran
Attachments: 1363873971-Letter to Senator Cochran.doc

Ms. Coalter:

Attached is a letter to Senator Cochran. Please have him to read it and respond as soon as possible. Again, thanks for your help.

Sincerely,

Marcia Starks, Secretary
Forrest County Environmental Support Team

Blab-away for as little as 1¢/min. Make PC-to-Phone Calls using Yahoo! Messenger with Voice.



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM**

P.O. BOX 374

HATTIESBURG, MISSISSIPPI 39403

EIN # 20-1494003

MOTTO: PSALM 51

**"Create In Me A Clean Heart, O God; And Renew A Right Spirit
With In Me"**

May 16, 2006

Senator Thad Cochran
188 East Capitol Street
Suite 614
Jackson, MS 39201

Dear Senator Cochran:

Once again the **Forrest County Environmental Support Team** is contacting your office regarding the Kerr McGee case. The last time we heard from your office was on January 11, 2006 from Ms. Kim Coalter. Three months have past and local and state officials have failed to take the necessary steps to ensure that the rights of the minority citizens are protected.

We have jumped through many hurdles to get to the point where we are now, and still haven't been able to resolve the issue with Kerr McGee. We started with our city officials and they have turned and looked the other way, until we started using legal, valid documents informing minority residents of Hattiesburg the monstrosity the **Black Lease Holders** have incurred.

You have been a Senator for over 20 years, and yet your record is vague when it comes to supporting bills and promoting lively hood here in the Black Pine Belt. The **Black Lease Holders** here in Hattiesburg have been done a terrible injustice and we are asking for you to step up to the plate and use your authority to help restore to the **Black Lease Holders** what they have been deprived of, and hold Kerr McGee, the City and the State of Hattiesburg, and attorneys pretending to represent the citizens of Hattiesburg responsible for the deception they have placed on the residents here in Hattiesburg.

Senator Thad Cochran

Page 2

May 16, 2006

Senator Cochran, we are requesting your assistance in this matter because you are an elected official with the responsibility of serving and protecting all citizens. We have a meeting scheduled with Kerr McGee the week of May 22, 2006. It is our goal to develop a relationship that will resolve this matter. We ask for any immediate attention that you may be able to provide to encourage Kerr McGee to move forward with respect, decency, and integrity. The court has granted the residents six months to resolve this matter and we have less than two months to resolve the case.

We're respectfully requesting that you become involve for two reasons: (1) our records and research will reflect a double-standard has been executed in the remediation that was performed in a tax reduction granted to white lease holders of state owned property; (2) secondly, we request a hearing before the appropriate committees, the Environmental Public Works Committee, and Judiciary Committee for the purpose of discovering if the minority residents civil rights and civil liberties have been violated. We believe that federal violations have occurred.

At the heart of our requests, we also ask that you visit our community for the purpose of touring this site to gain personal knowledge of how dangerous chemicals have caused this community to suffer for more than 50 years. Information about this site can be found under Gulf State Creosote, Hattiesburg, Mississippi. The EPA calls this site one of the second most dangerous sites in the United States. They also stated that the state had made mistakes in the handling of this matter.

We would appreciate you giving this matter your prompt attention. Thanks in advance for your assistance. We hope you will use this opportunity to improve your relationship with this community.

Sincerely,

Sherri Jones, Organizer
Forrest County Environmental Support Team

mbs/SJ

Coalter, Kim (Cochran)

From: REEDRCMOMS@aol.com
Sent: Friday, May 26, 2006 12:34 PM
To: Coalter, Kim (Cochran)
Cc: REEDRCMOMS@aol.com; sherrij45@zzip.cc
Subject: Kerr-McGee issues in Hattiesburg, Ms

Ms Coalter:

I have written you before but the e-mail came back. I called you a week or so ago concerning the Kerr-McGee issue in Hattiesburg. You wanted me to write you about our concerns.

Our concerns are that we have tried to get public officials involved in this helping us get justice for the black citizens involved in this case.

Kerr-McGee came in and paid H'burg Public School and the white 16th Section leaseholder for damages of an old creosote plant which they owned and did not pay the black leaseholder who were mostly impacted in the area across the tract. It seem that a railroad track alway separate blacks from white. We have seniors and childern who have been impacted by these chemicals. Some of the former residents have been diagnosed with lupus, cancer, stillbirths, cysts and may other ailments, we have also had family members to die, but at the time we did not know what was happening.

When Kerr-McGee paid these people they did a redemitation on the west side of the tract but called it ditch and drainage work on the east side. We they started the remediation procee residents in the neighborhood started to get sick and the doctors did not know what was causing the problems. They did not take any safety precautions for the children or anyone in the area.

We have been trying to get our public officials involved but we keep running into the same wall, it seems no one care about the Black voters. We only see public officials when it time to vote and after that they go into hiding.

We are asking Sen. Cochran to break the chain and get involved in this matter. We also ask they he would visit our community to see just what we are asking for and why we are seeking justice for the Black citizens in our community.

Thank you for you attention in this matter.

Carolyn Reed



Tony Russell/HW/OPC/DEQ
08/11/2006 01:37 PM

To "Watson, Keith" <Keith.Watson@tronox.com>@INETDEQ
cc Jerry Banks/HW/OPC/DEQ@DEQ
bcc
Subject Re: Hattiesburg - Will Harris Property

Yes that is true. Unless something unforeseen comes up, we are through with the remediation of Mr. Harris property.

Tony Russell
Assessment Remediation Branch Chief
Mississippi Department of Environmental Quality
101 West Capitol Street
Jackson, MS 39201
Phone 601-961-5318
Fax 601-961-5300

"Watson, Keith" <Keith.Watson@tronox.com>



"Watson, Keith"
<Keith.Watson@tronox.com>
08/11/2006 09:18 AM

To <Tony_Russell@deq.state.ms.us>
cc "Bock, Nick" <Nick.Bock@tronox.com>, "Bruun, Kim"
<Kim.Bruun@tronox.com>, "Cunningham, Myron"
<Myron.Cunningham@tronox.com>
Subject Hattiesburg - Will Harris Property

Under your watchful eye, the work to complete the remediation of Mr Will Harris's property was completed yesterday. I understand from our field crew that you concur the work is complete and that Tronox is free to return the property to Mr. Harris.

A. Keith Watson
Assessment & Remediation

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<<Keith.Watson.vcf>>

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Thank you. Keith.Watson.vcf

Coalter, Kim (Cochran)

From: Marcia Starks [msveneestarks41@yahoo.com]
Sent: Tuesday, May 16, 2006 9:20 AM
To: Coalter, Kim (Cochran)
Subject: KerrMcGee
Attachments: 3029009596-Letter To mayor & Council.doc

Ms. Coalter:

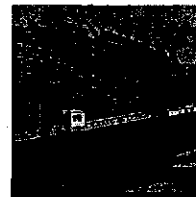
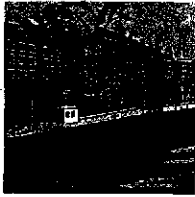
Ms. Coalter this is a follow up on the information I sent to James on yesterday concerning the Kerr McGee case. I would like to know did you receive the information? If not, I will be happy to send it to you for your review.

Attached is the information I sent to James on yesterday. For further information please contact me by email or 205-370-8219.

Sincerely,

Marcia Starks, Secretary
Forrest County Environmental Support Team

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FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003
MOTTO: PSALM 51

"Create In Me A Clean Heart, O God; And Renew A Right Spirit
With In Me"

May 16, 2006

Senator Thad Cochran
188 East Capitol Street
Suite 614
Jackson, MS 39201

Dear Senator Cochran:

Once again the **Forrest County Environmental Support Team** is contacting your office regarding the Kerr McGee case. The last time we heard from your office was on January 11, 2006 from Ms. Kim Coalter. Three months have past and local and state officials have failed to take the necessary steps to ensure that the rights of the minority citizens are protected.

We have jumped through many hurdles to get to the point where we are now, and still haven't been able to resolve the issue with Kerr McGee. We started with our city officials and they have turned and looked the other way, until we started using legal, valid documents informing minority residents of Hattiesburg the monstrosity the **Black Lease Holders** have incurred.

You have been a Senator for over 20 years, and yet your record is vague when it comes to supporting bills and promoting lively hood here in the Black Pine Belt. The **Black Lease Holders** here in Hattiesburg have been done a terrible injustice and we are asking for you to step up to the plate and use your authority to help restore to the **Black Lease Holders** what they have been deprived of, and hold Kerr McGee, the City and the State of Hattiesburg, and attorneys pretending to represent the citizens of Hattiesburg responsible for the deception they have placed on the residents here in Hattiesburg.

Senator Thad Cochran

Page 2

May 16, 2006

Senator Cochran, we are requesting your assistance in this matter because you are an elected official with the responsibility of serving and protecting all citizens. We have a meeting scheduled with Kerr McGee the week of May 22, 2006. It is our goal to develop a relationship that will resolve this matter. We ask for any immediate attention that you may be able to provide to encourage Kerr McGee to move forward with respect, decency, and integrity. The court has granted the residents six months to resolve this matter and we have less than two months to resolve the case.

We're respectfully requesting that you become involve for two reasons: (1) our records and research will reflect a double-standard has been executed in the remediation that was performed in a tax reduction granted to white lease holders of state owned property; (2) secondly, we request a hearing before the appropriate committees, the Environmental Public Works Committee, and Judiciary Committee for the purpose of discovering if the minority residents civil rights and civil liberties have been violated. We believe that federal violations have occurred.

At the heart of our requests, we also ask that you visit our community for the purpose of touring this site to gain personal knowledge of how dangerous chemicals have caused this community to suffer for more than 50 years. Information about this site can be found under Gulf State Creosote, Hattiesburg, Mississippi. The EPA calls this site one of the second most dangerous sites in the United States. They also stated that the state had made mistakes in the handling of this matter.

We would appreciate you giving this matter your prompt attention. Thanks in advance for your assistance. We hope you will use this opportunity to improve your relationship with this community.

Sincerely,

Sherri Jones, Organizer
Forrest County Environmental Support Team

mbs/SJ

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Hattiesburg residents call for city to take

By Reuben Mees

About 20 Southeast Hattiesburg residents milled about City Hall on Tuesday, carrying signs calling for the city to take a stand in a legal battle that has pitted residents against chemical giant Tronox.

The residents were asking the city to explain its role in the lawsuit against Tronox, formerly Kerr-McGee, that has been pending since the early 1990s and the remediation phase that began in 2002.

Most recently, a home at 116 Townsend St. that sat above a creosote-contaminated drainage ditch was demolished, and there is no record of a demolition permit.

The residents also questioned how the city handles a \$2 million trust fund set up by Tronox to deal with remediation issues.

"We're just fed up and want our voice to be heard by city council and the company," Braxton Street resident James Rogers said. "We're willing to settle in a fair and equal manner. But right now our biggest concern is the city officials, and we want to

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see some accountability."

After the Tuesday city council meeting, City Attorney Charles Lawrence said he hopes to send a letter to Tronox this week expressing the city's willingness to reach an agreement suitable to residents and the company.

"I'm working on a draft and I'll probably have it finished later this week," he said. Lawrence was instructed by the council to draft the letter after a closed meeting to discuss the litigation two weeks ago.

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Ward 5 City Councilman Henry Naylor said he supports the residents in their effort to reach an agreement.

"I applaud these citizens for their work," he said. "I fully support them for what they are trying to do, and like the mayor and Rep. Percy Watson, I will support them any and every way I can."

Lawrence also said in a letter the demolition at 116 Townsend St. would require a permit that would have to be obtained by either the contractor or homeowner.

Public Services Director Bennie Sellers, who has been an intermediary between Tronox and the city to complete the remediation process in the neighborhood, said he did authorize payment from the trust fund set up by Tronox to handle the work.

But he said the permit should have been obtained by either the contractor or homeowner.

Lawrence, however, said it is not uncommon for projects that require permits to be completed without obtaining a proper permit. It is a minor infraction that carries a small fine, he said.

Homeowners Will and Martha Harris, who are working with their attorney Kathleen Smiley and Tronox to resolve the case, had little to say on the matter earlier in the day Tuesday.

Unlike many of the residents who are still fighting for resolution, the Harrises continued to retain Smiley while other plaintiffs fired her from their cases.

"I'm satisfied with her representation and what Kerr-McGee is doing," Will Harris said.

Debbie Schramm, a spokeswoman for Tronox, said the company is attempting to resolve the case and doing its best to make the public aware of all issues surrounding it.

She said information was disclosed publicly at the time of the first remediation and the company is disclosing information as it arises.

"From the beginning, it was primarily an environmental remediation project although it was also being done as a project to improve the city's drainage in that area," she said. "We made no attempt to hide that and all of the reports containing information have been available at the public library."

Originally published April 19, 2006

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Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:16 PM
To: Coalter, Kim (Cochran)
Cc: REEDRCMOMS@aol.com
Subject: RE:

Ms Kim we don't expect anything, when your black and live Mississippi and 45 years old you kinded understand how things work, our concerns have already been forward to the appropriate folks for the past six years and the response have been the same nobody desires to become involve, we understand that if sen Cochran response is the same, then we will simply put his name on the list with the other public officials the have no concerns about what happens in the black community. Our request is simply will he visit our community and will he help with hearing on this matter. We need a yes or no then we can decide what to do next.....thanks for your time you have been kind.....sj

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

From: Coalter, Kim (Cochran) [mailto:Kim_Coalter@cochran.senate.gov]
Sent: Thursday, May 25, 2006 8:52 AM
To: sherrij45@zzip.cc
Subject:

We can't promise anything, so please don't think we can definitely make something happen. However, I will share your concerns with the appropriate folks. Thanks!!!

From: Sherri Jones [mailto:sherrij45@zzip.cc]
Sent: Wednesday, May 24, 2006 6:10 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Thanks Ms Kim we meet this week with Kerr-McGee if we could get a little support for sen. Cochran this nightmare could be put it rest thanks for your time sj.

Patrick S. Corbett Vise President of safety and environmental affairs for Kerr-McGee was in Jackson on Monday of this week and we look forward to a good relationship with the company but we still need the support of our elected official.....

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

From: Coalter, Kim (Cochran) [mailto:Kim_Coalter@cochran.senate.gov]
Sent: Wednesday, May 24, 2006 8:01 AM
To: Sherri Jones
Subject: RE: Kim with Senator's office

'Sorry - I have so many cases, I can't remember folks right off the bat! I am collecting letters, and then I will send them all at once to the proper officials.

From: Sherri Jones [<mailto:sherrij45@zzip.cc>]
Sent: Tuesday, May 23, 2006 5:54 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Ms Kim I am sorry this is regarding the request from FORREST COUNTY ENVIRONMENTAL SUPPORT TEAM about a visited to our community thank you.

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

From: Coalter, Kim (Cochran)
[\[mailto:Kim_Coalter@cochran.senate.gov\]](mailto:Kim_Coalter@cochran.senate.gov)
Sent: Tuesday, May 23, 2006 8:29 AM
To: Sherri Jones
Subject: RE: Kim with Senator's office

What is this regarding?

From: Sherri Jones [<mailto:sherrij45@zzip.cc>]
Sent: Monday, May 22, 2006 10:03 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Ms Kim please let use know how long it will be before we can a reply from sen. Cochran thanks.....

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

From: Coalter, Kim (Cochran)
[\[mailto:Kim_Coalter@cochran.senate.gov\]](mailto:Kim_Coalter@cochran.senate.gov)
Sent: Wednesday, January 11, 2006 2:07 PM
To: sherrij45@zzip.cc
Subject: Kim with Senator's office

Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:19 PM
To: Coalter, Kim (Cochran)
Subject: FW: Metting in Jackson, MS

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

From: REEDRCMOMS@aol.com [mailto:REEDRCMOMS@aol.com]
Sent: Thursday, May 25, 2006 4:53 PM
To: patcorbett@tronox.com; ldickerson@tronox.com
Cc: sherrij45@zzip.cc; REEDRCMOMS@aol.com
Subject: Metting in Jackson, MS

Dear Gentlemen:

The Forrest County Environmental Support Team would first like to thank you and the Kerr-McGee Corporation for your continued efforts and concerns for what we believe have become a legal and environmental tragedy in Hattiesburg, MS, because of a lack of honesty and integrity displayed by people in positions that should have been representing both the community and Kerr-McGee. We would also like to apologize for canceling the meeting which was schooled for 7 a.m. Tuesday morning. We very much appreciate the concerns that representatives of Kerr-McGee have began to display that you have of resolving this matter. It is for these reasons the committee elected to reschedule the meeting with your company in order to allow time for continued dialogue in hope that a resolution could be agreed upon that would allow Kerr-McGee access to all necessary properties in the community to complete your project. We also hope that such an agreement will result in the immediate relocation of the residents at 106 Scooba St. and resolution with Down Home Cooking.

We however will not stop or delay pursuing all avenues that we feel is necessary and available to the community to obtain a fair and just resolution on behalf of the entire minority community who we believe the record will now reflect were excluded, mislead and misrepresented by all parties involved and denied due process. We however continue to enter into every meeting and discussion in hopes of developing a working relationship with Kerr-McGee for the sole purpose of improving the environment in our community.

We would like to thank Mr. Corbett for his extra effort in visiting our state during times where we all are concerned about our safety when we travel. We believe by his visit it displayed your interest in resolving this matter. We would also like to thank Mr. Dickerson who has continued to try to make sure that the lines of communication stays open whiten we believe will result in parties being able to find common ground that would allow both Kerr-McGee and the minority community to work toward resolution.

Last but not least we would like to thank Honorable Percy Watson who we believe possesses the ability to assist both Kerr-McGee and his constitutions in resolving this matter. The committee upon recommendation of Vermell Woods will yield a designated time an allow the participants in Monday's meeting and opportunity to resolve their issues.

We will be forwarding the representative listed above of the information and work that this committee have been and will continue to be engaged in for the purpose of resolving these issues that has plague our community for over 5 decades. Again we would like to thank all parties involved.

Forrest County Environmental Support Team

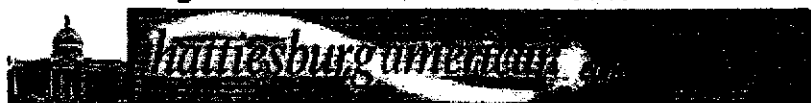
Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:23 PM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Many wait on creosote settlement

By Reuben Mees

Clevester Woods said she would gladly move from her Scooba Street home that has high levels of the carcinogen creosote.

But she said she doesn't intend to leave the home and 51 years of memories it has property and health problems caused by living there.

▼ ADVERTISEMENT ▼ "They can have it, but I have to be comfortable," she said. "No shaking. I just want to make sure there is some justice."

Woods is one of numerous residents in the predominantly black southeast Hattiesburg neighborhood with Kerr-McGee, a chemical giant now known as Tronox that owns the property located in the early 20th century.

Tronox officials and Mississippi Department of Environmental Quality environmental cleanup neighborhood in recent months and are hoping to finish the cleanup by the middle

"The next phase of the plan will include remediation of the drainage ditch and sewer system," spokeswoman Debbie Schramm.

That is centered around a 116 Townsend St. home where the residents have already reported significant contamination in the soil.

"Some places as deep as 5 to 6 feet, but most seem to be in the top 1 to 3 feet," said the assessment and remediation division chief. "We're trying to determine where, how and how often to remove the creosote."

After the area around Townsend and Harrell is cleaned, Schramm said, they will also clean up East Side Avenue, where a contaminated drainage ditch runs behind Woods' restaurant.

But while Woods and the restaurant owners may see closure on their particular property, a class action lawsuit of several thousand residents, many of whom still have not acted



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"We want to see justice done for all these people," Forrest County Environmental

The company has offered to settle with clients at least twice - the first of which was an action suit. While several hundred people reportedly took this offer, many more came to a Dec. 1 hearing in U.S. District Court.

But some people still have not settled their claims and have less than six months to

To help resolve this, Jones said the group has recruited State Rep. Percy Watson along with Ward 5 Councilman Henry Naylor.

"I've been talking to the organizers and talking to a couple of officials at Kerr-McGee at various stages of the discussion, but it seems both sides want to end the controversy. It's just a matter of when they should find."

Schramm said about 2,000 claims have been settled with residents in excess of \$1

But leaders of the effort in the black community say that \$1.3 million for the thousands of claims compared to the multi-million dollar settlement from an earlier case.

The previous case was filed in 1992 and settled in 2002 with the Hattiesburg Public Schools over the railroad tracks. While the settlement is not public, the school district received major significant property tax reductions immediately after the outcome.

"We want the contamination cleaned up. We want financial justice - the same justice that the Rev. Ivory Walmon, who was a longtime resident of the neighborhood.

Attorney complaints

But the environmental issues are only one aspect of the case, Woods said.

Throughout the case, Woods and numerous other residents were unsure exactly what

Kathleen Smiley of Gulfport, one of three lawyers who have been involved with the case, but the client said her lawyer has not returned calls or seen her when she visited her

"She won't return our calls and she won't see us if we go down there," Woods said. "It's a big problem for her to get up here, but she can get to Laurel where she settled a case worth a million."

Smiley did not return calls for this story or other recent stories on the issue.

Woods said Smiley stopped working with large portions of the community after the

Woods produced e-mails between Smiley and Kerr-McGee in which the lawyer referred to Kerr-McGee officials to "hold strong" on their \$400 offer to her clients.

Woods produced documents regarding a new complaint filed two weeks ago again on Wednesday to respond.

"The attorney completely disregarded and disrespected her clients," said Basil Halpern, who is volunteering to assist the local group in their fight.

"Never showing up in court at the court dates and having private phone conversations with clients in disregard for her clients."

But Hall said despite the problems, he believes the chemical company will do the r

"We do believe Kerr-McGee will come to an agreement and work out a resolution,'
regarding the whole situation to just ignore it."

Originally published February 13, 2006

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Officials discuss Kerr-McGee suit

By Reuben Mees

Hattiesburg and Forrest County officials discussed their role Thursday in the ongoing community and a chemical giant that now owns the former Gulf States creosote plant.

Residents from an area bounded by the railroad tracks on the northwest and Marti meeting to hear from a county supervisor, two members of the county tax assessors and the Mississippi Bar Association.

▼ ADVERTISEMENT ▼ The group discussed the past and present status of a federal plant that is now known as Tronox.

The case filed by the Hattiesburg Public School District dates back to the early 1990s. Residents in the neighborhood southeast of the tracks believe they were intentionally left out of that settlement and deny the citizens their civil rights.

The school district filed the suit because it owns nearly all the land in question and

That case was settled in 2002 when the school district received almost \$4.5 million from white business owners, on the opposite side of the tracks settled for undisclosed amounts.

But the settlement also resulted in a reduction in the taxable value of the land north of the tracks. A reappraisal program in the southeast neighborhood that the residents claim was done without

Bruce Templeton, chief tax assessor for Forrest County, acknowledged that he lives in the neighborhood after the school district paid for and submitted an environmental survey of the soil.

"We will do the same thing for this side of the tracks, but we are appraisers and as appraisers we have to be fair," Templeton said.

"Why do we have to pay and wait for our taxes to be lowered when folks on that side of the tracks don't pay?" resident James Rogers asked.



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But the residents were also incensed over the city's involvement in the lawsuit, whi

City Public Works Director Bennie Sellers, who did not attend the evening meeting intermediary between Kerr-McGee and the residents to complete the remediation | Environmental Quality.

Sellers said the city managed a \$2 million payment from the company and oversav city is handling the current Classic Drive improvement project for University of Sou

"We acted as a conduit based on the plans and specifications agreed by Kerr-McG way I saw it the city of Hattiesburg got about \$2 million in work to improve the neig for."

But Sherri Jones, organizer of the Forrest County Environmental Support Team, sa access to the neighborhoods eliminated residents from discussions with the compi

"Going door-to-door was what they should have done in 1992," he said. "Kerr-McG residents so they partnered with the city of Hattiesburg."

Jones said recent efforts by Mayor Johnny DuPree and State Rep. Percy Watson |

"I don't think the city's role at this point is clearly defined," city attorney Charles Lav of the frustration the committee feels, but we have to look to state law to determin

Adam Kilgore, the bar association's general counsel, also described the process fc

Many residents have claimed Gulfport lawyer Kathleen Smiley has inadequately re mails to Kerr-McGee lawyers and failed to return calls or see them during visits.

While Kilgore said he could not comment on specifics of any existing or previous c to communication are not typically considered ethical violations while some of the |

Smiley did not return a telephone call seeking comment.

Kerr-McGee spokeswoman Debbie Schramm, who has denied any racial motivatic Thursday the case is continuing to advance. Contractors recently tore down a horr contamination from the soil there, she said.

Originally published March 24, 2006

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Hattiesburg residents call for city to take a stand

By Reuben Mees

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▼ ADVERTISEMENT ▼ Most recently, a home at 116 Townsend St. that sat above a creosote-contaminated drainage ditch was demolished, and there is no record of a demolition permit.

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"We're just fed up and want our voice to be heard by city council and the company," Braxton Street resident James Rogers said. "We're willing to settle in a fair and equal manner. But right now our biggest concern is the city officials, and we want to see some accountability."

After the Tuesday city council meeting, City Attorney Charles Lawrence said he hopes to send a letter to Tronox this week expressing the city's willingness to reach an agreement suitable to residents and the company.

"I'm working on a draft and I'll probably have it finished later this week," he said. Lawrence was instructed by the council to draft the letter after a closed meeting to discuss the litigation two weeks ago.

Ward 5 City Councilman Henry Naylor said he supports the residents in their effort to reach an agreement.

"I applaud these citizens for their work," he said. "I fully support them for what they are trying to do, and like the mayor and Rep. Percy Watson, I will support



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them any and every way I can."

Lawrence also said in a letter the demolition at 116 Townsend St. would require a permit that would have to be obtained by either the contractor or homeowner.

Public Services Director Bennie Sellers, who has been an intermediary between Tronox and the city to complete the remediation process in the neighborhood, said he did authorize payment from the trust fund set up by Tronox to handle the work.

But he said the permit should have been obtained by either the contractor or homeowner.

Lawrence, however, said it is not uncommon for projects that require permits to be completed without obtaining a proper permit. It is a minor infraction that carries a small fine, he said.

Homeowners Will and Martha Harris, who are working with their attorney Kathleen Smiley and Tronox to resolve the case, had little to say on the matter earlier in the day Tuesday.

Unlike many of the residents who are still fighting for resolution, the Harrises continued to retain Smiley while other plaintiffs fired her from their cases.

"I'm satisfied with her representation and what Kerr-McGee is doing," Will Harris said.

Debbie Schramm, a spokeswoman for Tronox, said the company is attempting to resolve the case and doing its best to make the public aware of all issues surrounding it.

She said information was disclosed publicly at the time of the first remediation and the company is disclosing information as it arises.

"From the beginning, it was primarily an environmental remediation project although it was also being done as a project to improve the city's drainage in that area," she said. "We made no attempt to hide that and all of the reports containing information have been available at the public library."

Originally published April 19, 2006

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Coalter, Kim (Cochran)

From: Davis, Brad (Cochran)
Sent: Thursday, May 25, 2006 5:34 PM
To: Coalter, Kim (Cochran)
Subject: FW: Please Help
Attachments: Letter to Pickering re Appeal of commercial demolition.doc

Kim,

Suzanne seems to always send these to me, but I'll let you take care of it.

If I can provide some assistance, please let me know.

I hope you have a good long weekend.

Brad Davis

From: Case, Suzanne (Cochran)
Sent: Tuesday, May 16, 2006 1:57 PM
To: Gatchell, Parah (Cochran); Davis, Brad (Cochran)
Subject: FW: Please Help

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

From: Harrietta Eaton [mailto:heaton@cityofpascagoula.com]
Sent: Tuesday, May 16, 2006 11:01 AM
To: Case, Suzanne (Cochran); Ward, Beverly (Cochran)
Subject: Please Help

Dear Suzanne and Beverly,

Can the office of Senator Thad Cochran please assist the City of Pascagoula with the appeals we are making toward getting FEMA to consider adding some sites that we submitted earlier to the list of approved ones for commercial demolition? With the June 30, 2006 deadline approaching, it is imperative that this matter be resolved. As you probably know, our community was impacted by the storm and unfortunately about 90% of our city went under water. I have attached to this email a letter that we sent to Congressman Pickering's office last week also trying to get his support of this. Your kind consider of this request is deeply appreciated. Can you also please forward this to Parah? I have misplaced her email address.

If you have any questions or require additional information, please do not hesitate to contact our City Manager, Kay Kell, at (228) 938-6614. She knows more about this than I do.

Sincerely

Harrietta Eaton, MPA
Director of Administration

P.O. Drawer 908
Pascagoula, MS 39568-0908
Phone: 228-762-1020 or 228-219-6726 cell

Email: heaton@cityofpascagoula.com

5/26/2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 21 2003

Mr. James Rogers
Concerned Citizens of Hattiesburg, MS
1001 E. 7th Street
Hattiesburg, MS 39401

Dear Mr. Rogers:

We have received your letter of September 14, 2003, which was sent to Marianne Horinko at USEPA Headquarters. We appreciate your concern regarding the contamination at the former Gulf States Creosoting facility. We hope the following response, coordinated between EPA, the Agency for Toxic Substances Disease Registry (ATSDR), and the Mississippi Department of Environmental Quality (MDEQ), is of help to you.

Gulf States Creosoting Company and then American Creosoting Corporation operated a creosote wood preservation facility on 16th Section Land in Hattiesburg, MS. As you may be aware, 16th Section Land in Mississippi is land which is owned by the state. This particular land was held in trust by the state for the Hattiesburg Public School District and leased to various businesses. American Creosote ceased wood-treating operations around 1960. In 1964, Kerr-McGee Chemical Corporation purchased the assets and liabilities of the American Creosoting Corporation.

EPA became aware of the site around 1989. In 1990, MDEQ conducted a Preliminary Assessment (PA), for EPA, under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the Superfund program. The PA, which does not include any sampling, recommended a high priority for additional investigation. In 1991, MDEQ then conducted a Site Inspection (SI), which includes sampling, and determined that no further remedial action under CERCLA was necessary. The basis for this determination is the Hazard Ranking System, or HRS. The HRS is a federal regulation, found at 40 C.F.R. §300, that provides a standard framework for evaluating the hazards at sites, and assigning a numerical score. Factors evaluated include level of contamination, extent of contamination, toxicity and bio-accumulation potential of contaminants, population and land use, drinking water sources, and more. Sites with numerical scores greater than 28.5 are then recommended for placement on the National Priorities List (NPL). NPL sites are those which are typically referred to as Superfund Sites and which are then cleaned up through either the use of the Superfund or, preferably, through legal action which requires the Potentially Responsible Party (PRP) to conduct the cleanup. The inability of a site to obtain a sufficient score for HRS ranking does not mean the site may not pose a concern to local residents or state and local governments. The former Gulf States Creosoting site, which is of concern to you, did not score greater than 28.5, and so was not recommended for placement on the NPL.

The site was then referred to the EPA Emergency Response and Removal Program (ERRB) to determine if any immediate action was necessary. ERRB assessed the property, in conjunction with ATSDR, and determined that the site was of low priority for a removal action and should be addressed by MDEQ.

After determining that Kerr-McGee was the responsible party, MDEQ began negotiations with Kerr-McGee for a voluntary cleanup. EPA does not oversee the states' voluntary cleanup programs but does provide technical assistance upon request. At the request of MDEQ, EPA reviewed the human health risk assessment prepared by Kerr-McGee's contractor. These comments were sent to MDEQ in June 2000. For each of the areas being remediated, Kerr-McGee submitted work plans and health and safety plans to MDEQ. Cleanup levels are set at the levels established in the risk assessment for the different exposure scenarios which are protective of human health and the environment. Attached are two fact sheets issued by MDEQ at public meetings in November 2002 and October 2003. These fact sheets detail the areas being remediated and address many of your concerns regarding exposure and groundwater.

The lawsuit which you mentioned in your letter, as well as various other lawsuits, were brought against Kerr-McGee by in the United States District Court regarding this issue. These were settled after MDEQ approved the Remedial Action Workplan, which is the basis for the cleanup. Note that MDEQ was not a party to the lawsuit, but the resolution of the case did hinge on approval of the cleanup plan by MDEQ. Once approved, MDEQ and Kerr-McGee entered into an Agreed Order which states that Kerr-McGee will execute the cleanup plan as approved. A Judgement of Dismissal was then signed by Judge Pickering regarding these cases. If any compensation was paid as a result of these cases, EPA is not aware.

We appreciate your concern for the health of the local citizens during the cleanup. Although short-term exposure to creosote is not generally harmful, it does have an unpleasant odor which can be nauseating, and it can aggravate existing difficulties such as asthma. The City of Hattiesburg, who has contracted the North East Drainage Ditch project, which is being funded by Kerr McGee, has agreed to move one of the elderly residents to a hotel during the time of the remediation. We are unaware of additional residents who may require special accommodations.

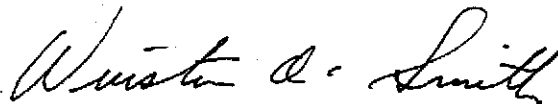
You noted your concern that some workers were being told to abandon the site when creosote was encountered. The reason for this is that there are two crews of workers. One crew is removing the contamination by excavating the drainage ditch, and the other crew is following to install a new and upgraded drainage ditch in its place. The crew removing the contamination has been trained in hazardous waste operations per federal Occupational Health and Safety Administration (OSHA) regulations. Because the construction crew has not had this training, they have been asked to leave the area when the creosote is encountered, so that the properly trained workers can handle the creosote removal.

You mentioned that Davis Timber Company was a Superfund site but did not feel it posed as great a risk as the former Gulf States Creosoting Company location. As you stated, the toxicity, persistence and bioaccumulation of the chemicals of concern are all considered under the Hazard Ranking System. Davis Timber used pentachlorophenol (PCP) in their wood treating process. PCP is far more toxic than creosote which may explain why the Davis Timber Company received a higher HRS score and was referred to the NPL. The HRS scoring information is available in the file for both sites.

The ATSDR has received a request to conduct a health assessment in the area surrounding the former Gulf States Creosote site, and is currently investigating whether this is necessary. EPA relies on ATSDR's expertise in evaluating health concerns and is awaiting their decision.

We hope this response has been helpful in addressing your concerns about the former Gulf States Creosote wood treating operation in Hattiesburg, MS. If EPA may be of further assistance, please feel free to contact Donna Webster, in the Waste Division, at (404) 562-8870. If you have questions regarding ATSDR's investigation, you may contact Carl Blair at (404) 562-1786. If you would like more specific information about the work plans and agreements made with MDEQ, please contact Tony Russell at (601) 961-5318.

Sincerely,



Winston A. Smith, Director
Waste Management Division

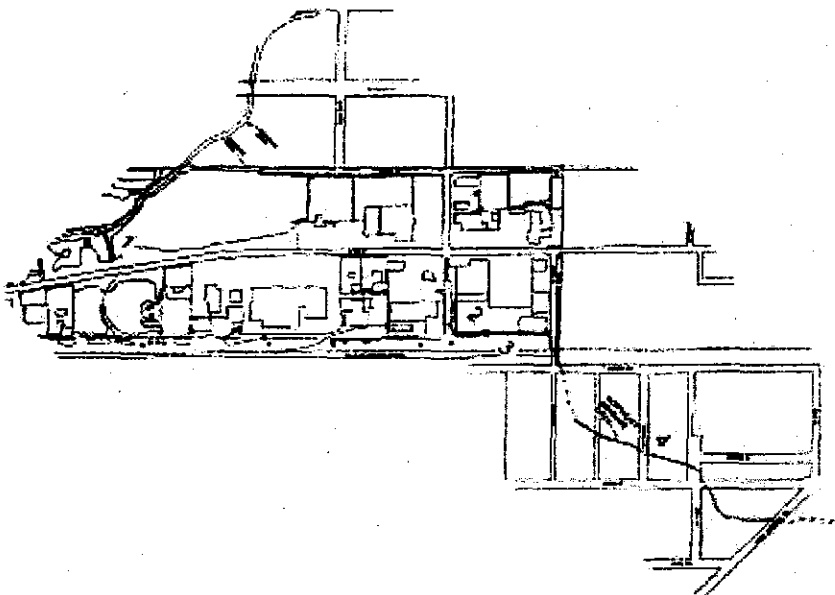
Enclosures

If you have any additional questions,
please contact:

Mississippi Department of Environmental Quality
Uncontrolled Sites Section
(601) 961-5318

Mississippi Department of Environmental Quality
Field Services Division
(601) 961-5011

Mississippi Department of Environmental Quality
Legal Division
(601) 961-5369



Mississippi
Department

of ENVIRONMENTAL QUALITY

**PROPOSED
CLEANUP PLANS**
for the former Gulf
States Creosote
site in Hattiesburg

October 2003

MDEQ
Protect Mississippi's
land and water through fair
and responsible regulation.

P.O. Box 20305
Jackson, MS 39289
www.mdeq.state.ms.us



If you have any additional questions,
please contact:

Mississippi Department of Environmental Quality
Uncontrolled Sites Section

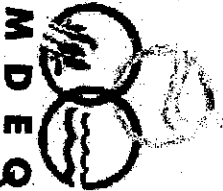
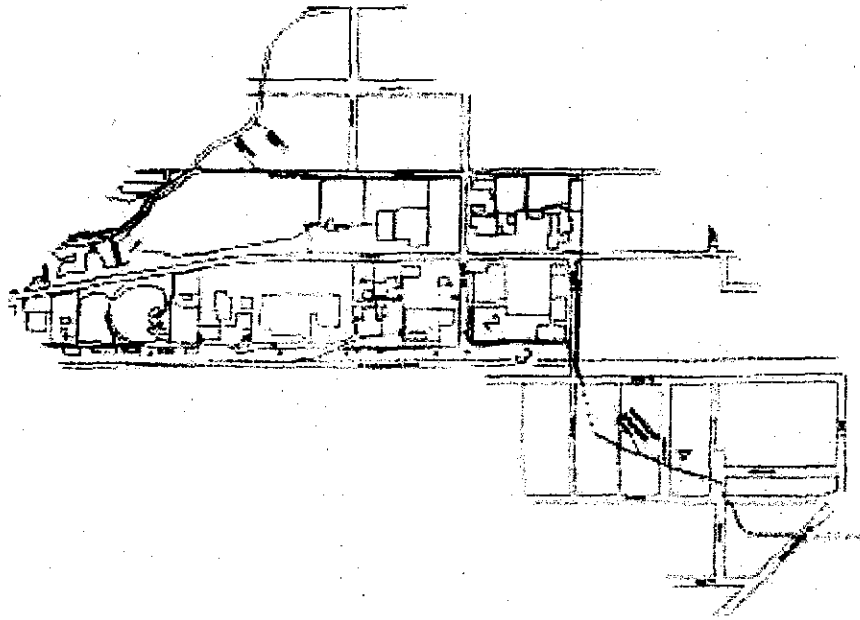
(601) 961-5318

Mississippi Department of Environmental Quality
Field Services Division

(601) 961-5011

Mississippi Department of Environmental Quality
Legal Division

(601) 961-5369



Mississippi
Department

of ENVIRONMENTAL QUALITY

**PROPOSED
CLEANUP PLANS
for the former Gulf
States Creosote
site in Hattiesburg**

NOVEMBER 2002

MDEQ

and responsible regulation.

P.O. Box 10385
Jackson, MS 39289
www.mdeq.state.ms.us



The Mississippi Department of Environmental Quality (MDEQ) is publishing this notice to inform the citizens of Hattiesburg and the surrounding area about the proposed cleanup of the former creosote plant located in and around Courtesy Motors on West Pine Street.

The former creosote plant operated from the early 1900's to approximately 1960. Since the plant operated prior to the creation of MDEQ, the agency never regulated this site. In 1962, the site was redeveloped for commercial and light industrial use.

(see map on back)

Forster Hill Area (between West Pine St. & Gordon's Creek) Proposed Cleanup: Install sheet piling wall along the creek bank to eliminate seepage into the creek, install monitoring and recovery wells along the wall to monitor and recover any free product that may collect, install concrete culvert from West Pine Street to Creek, cover the area with a liner and plant trees to prevent mounding of groundwater along the sheet-piling wall.

(see map on back)

Former Process Area (between Scooba St. & Family Ln) Proposed Cleanup: Remove creosote contaminated soil from the wooden substructure and the concrete sump area, backfill with compacted clay fill material, regrade the surface and cap the area with a liner and asphalt.

(see map on back)

Southern Railroad Track Area Proposed Cleanup: Remove creosote contaminated sediment and soils from within and beneath the drainage ditch. Depending on the effects of the integrity of the railroad tracks, the soils will either be capped in place or removed.

(see map on back)

Northeast Ditch from Scooba Street to Katie Street Proposed Cleanup: Remove contaminated sediment and soils, install a finer and sand bed in the ditch, install culvert and surface drains, and then backfill around culverts with clean soil.

In an effort to address some of your concerns, MDEQ has listed answers to the most frequently asked questions about the proposed cleanup. If you have any other questions, please contact Tony Russell at (601) 961-5318.

Question 1. Has the City's drinking water been contaminated by creosote or other wood treating chemicals?

No. There is no threat to the City of Hattiesburg's drinking water supply, but MDEQ will require monitoring on a semi-annual basis for two years to watch for any possible migration of groundwater contamination. After two years, the monitoring will be performed on an annual basis for an indefinite period of time.

Question 2. Have the citizens or residents in the area been exposed to creosote contamination at the surface?

No. MDEQ is not aware of any direct exposure at this time. The limited amount of contamination that exists is below the surface. Although creosote contamination exists in the drainage ditch that runs from Scooba Street to Katie Street, there is no direct exposure because the contamination has been covered by sediment that has been deposited over time.

Question 3. How does MDEQ know that the shallow groundwater contamination will not impact the City of Hattiesburg's drinking water supply or a private well? Extensive groundwater monitoring will allow MDEQ to watch the location of the groundwater contamination and ensure that any migration does not threaten drinking water in the area. A private water well search was conducted in October 2000 in the residential area surrounding the site, and no private wells were identified. Also, the City of Hattiesburg has an ordinance that prohibits the drilling of private wells within the city limits.

Question 4. What is the possibility that contamination will continue to migrate in the future? The remedies proposed should eliminate the possibility for migration in the fill area, process area, and drainage ditch.

Question 5. How long will the remediation take place?

The remedies proposed for the process area and the fill area will be accomplished within one year. The remedy for the northeast drainage ditch may take more than one year due to size of the project and weather conditions.

Question 6. Does MDEQ know if the contaminants have migrated from the site to the soils in the residential yards in the area? Soil samples have been collected in the residential area, and no contamination was found above the target remediation goal levels established by MDEQ.

Question 7. When the company begins the cleanup of the site, will this create exposure to residents in the area?

No. But there will be odors associated with the removal of contaminated soils from the process area and the Northeast drainage ditch. Citizens will not be exposed to harmful levels of contaminants from the site.

Question 8. What is being done about the creosote in Gordon's Creek?

MDEQ knows there are occasional seepages from the old fill area into Gordon's Creek, but an ecological assessment conducted by the Corp of Engineers indicated that there are no environmental impacts to the creek. A sheet-piling barrier wall will be installed to eliminate further discharges to the creek.

TRONOX

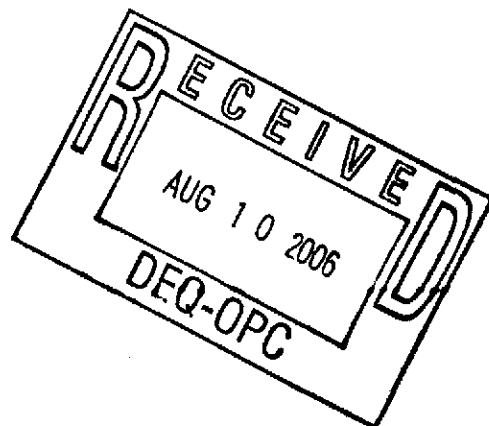
Name A. Keith Watson
Title Project Manager

Phone 405-775-5475
Fax 405-775-8563
e-mail Keith.Watson@Tronox.com

August 7, 2006

Tony Russell, Chief
Mississippi Department of Environmental Quality
Assessment Remediation Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Re: Gulf States Creosote Site
Northeast Drainage Ditch Project
Hattiesburg, Mississippi



Dear Mr. Russell:

Pursuant to the request of the Mississippi Department of Environmental Quality in the letter dated December 21, 2004, Tronox LLC is providing this status report regarding access to those parcels of land that may require further attention pursuant to the MDEQ-approved Work Plan for the Northeast Drainage Ditch.

The Bevon property. Tronox, through local Hattiesburg counsel, has successfully obtained access to the Bevon property.

The American Legion Auxiliary Property. Tronox has finalized an access agreement for the referenced property.

The Norfolk Southern right-of-way. In lieu of the recent MDEQ decision on the risk assessment methodology provided in an email of 2/21, Tronox may need to modify the remedial design for this property. Then, Tronox and NSRR can intelligently discuss access requirements.

The Woods property. Tronox is actively negotiating with Mrs. Woods; with a local politician is acting as a facilitator. We should know very soon if this negotiation will be successful. Tronox may yet require MDEQ intervention to resolve this access issue.

We appreciate your attention and assistance towards completion of the Northeast Drainage Ditch Work Plan.

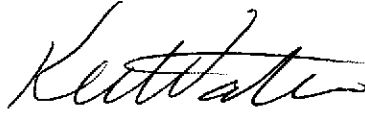
Tronox LLC

123 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102 • P.O. Box 268859, Oklahoma City, Oklahoma 73126-8859

Mr. Tony Russell
August 7, 2006
Page 2

If you have any questions or comments, please call me at (405) 775-5475.

Sincerely,

A handwritten signature in cursive script, appearing to read "Keith Watson".

A. Keith Watson
Project Manager

Copy: N. Bock
J. Raiford – Adams & Reese
D. Shandy



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

FILE COPY

August 3, 2006

Mr. Keith Watson
Tronox
P. O. Box 25861
Oklahoma City, OK 73125

Re: Gulf States Creosote Site
Will Harris Property – Additional Soil Removal
116 Townsend Street
Hattiesburg, Mississippi

Dear Mr. Watson:

The Mississippi Department of Environmental Quality has reviewed the scope of work for additional soil removal at 116 Townsend Street in Hattiesburg, MS. The work plan was approved by email to Dave Upthegrove on July 12, 2006. This letter will formally document the approval of the scope of work.

I am unavailable for the proposed date of August 9 to conduct the removal. Alternate dates for next week are August 8 and 10. Please call me with any questions you may have concerning this matter at 601-961-5318.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Russell".

Tony Russell, Chief
Assessment Remediation Branch

cc: Dave Upthegrove Michael Pisani & Associates



"Dave Upthegrove"
<dupthegrove@ix.netcom.com>

08/03/2006 09:21 AM

To "Corey Milton" <cmilton@netdoor.com>, "Brad Blalock" <bmballock@ix.netcom.com>
cc "Watson, Keith" <Keith.Watson@tronox.com>, <Tony_Russell@deq.state.ms.us>, "Debbie Schramm" <debbie.schramm@tronox.com>

bcc

Subject Additional Soil Removal - 116 Townsend Street

Corey and Brad:

We're set to complete the soil removal at 116 Townsend Street next Thursday, August 10. The work will consist of excavating one foot of native soils from the approximately 60' x 10' area shown on the attached figure. I believe that clean fill was placed over at least a portion of the proposed excavation area to allow the lot to properly drain. It should be easy to distinguish the red sandy clay from the underlying native soils, so I'd like to scrape the fill back, remove one foot of soil and bring in additional fill to backfill to grade.

As we've discussed, the volume to be removed is just over 20 cubic yards, which should be manageable in two truckloads. Let's not get any closer than one to two feet from the fenceline for the adjoining property, as we don't want to undermine the integrity of the fence posts. Brad, our stakes should still be present from our previous work, so it should be pretty easy for you and Bobby to lay things out using the attached figure. Since we're only taking out one foot of soil, we shouldn't need to compact with anything more other than the trackhoe.

As during the previous work, health and safety are of the utmost importance. Please make certain that the work area is secure, and be aware that there may be community activist and/or local media onsite. Please refer all questions to Tony Russell or to Debbie Schramm of Tronox at 405/775-5177. Brad, I'll FedEx you pre-prepared manifests, several copies of the flyers that were previously sent out to surrounding residents and a handful of Debbie's cards, just in case you need them.

Thank you in advance for your diligence and hard work.

Dave

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)
dupthegrove@ix.netcom.com

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Version: 7.1.394 / Virus Database: 268.10.5/406 - Release Date: 8/2/2006



Proposed Soil Removal Area - 116 Townsend.pdf



"Dave Upthegrove"
<dupthegrove@ix.netcom.com>
m>
08/02/2006 02:44 PM

To "Tony Russell" <tony_russell@deq.state.ms.us>
cc "'Watson, Keith'" <Keith.Watson@tronox.com>
bcc

Subject FW: Proposed Surface Soil Removal - 116 Townsend

We have tentatively scheduled for next Wednesday, August 9th the additional soil removal at 116 Townsend, as described in the email below and approved in your email of 7/12/06. As the 60' x 10' x 1' excavation should yield less than two truckloads of soil, we anticipate that the work will be completed in a single day, including backfilling and compaction. We plan to inform Will Harris that he can begin construction of his new home as soon as we've completed the additional soil removal.

In other good news, Tronox has finalized the agreement with Down Home Cookin' and plans to complete that work as soon as a schedule for temporarily shutting down the restaurant can be reached. We'll keep you posted, but if things go as planned we should be able to complete that work within the next 30-45 days.

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)
dupthegrove@ix.netcom.com

From: Dave Upthegrove [<mailto:dupthegrove@ix.netcom.com>]
Sent: Tuesday, July 11, 2006 9:11 AM
To: Tony Russell (tony_russell@deq.state.ms.us)
Cc: 'Watson, Keith'
Subject: Proposed Surface Soil Removal - 116 Townsend

Tony:

Attached is a figure depicting our proposed additional soil removal area at 116 Townsend Street. As shown on the attached table, removal of 1 foot of soil at SS-05, SS-07, SS-09 and the associated step-outs will result in an average benzo(a)pyrene concentration of 0.61 mg/kg in zero to 1' soils at the property.

Should you have any questions or wish to discuss, please contact me or Keith.

Regards,

Dave

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)



"Dave Upthegrove"
<dupthegrove@ix.netcom.com>
07/11/2006 09:10 AM

To "Tony Russell" <tony_russell@deq.state.ms.us>
cc "Watson, Keith" <Keith.Watson@tronox.com>
bcc
Subject Proposed Surface Soil Removal - 116 Townsend

Tony:

Attached is a figure depicting our proposed additional soil removal area at 116 Townsend Street. As shown on the attached table, removal of 1 foot of soil at SS-05, SS-07, SS-09 and the associated step-outs will result in an average benzo(a)pyrene concentration of 0.61 mg/kg in zero to 1' soils at the property.

Should you have any questions or wish to discuss, please contact me or Keith.

Regards,

Dave

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)
dupthegrove@ix.netcom.com

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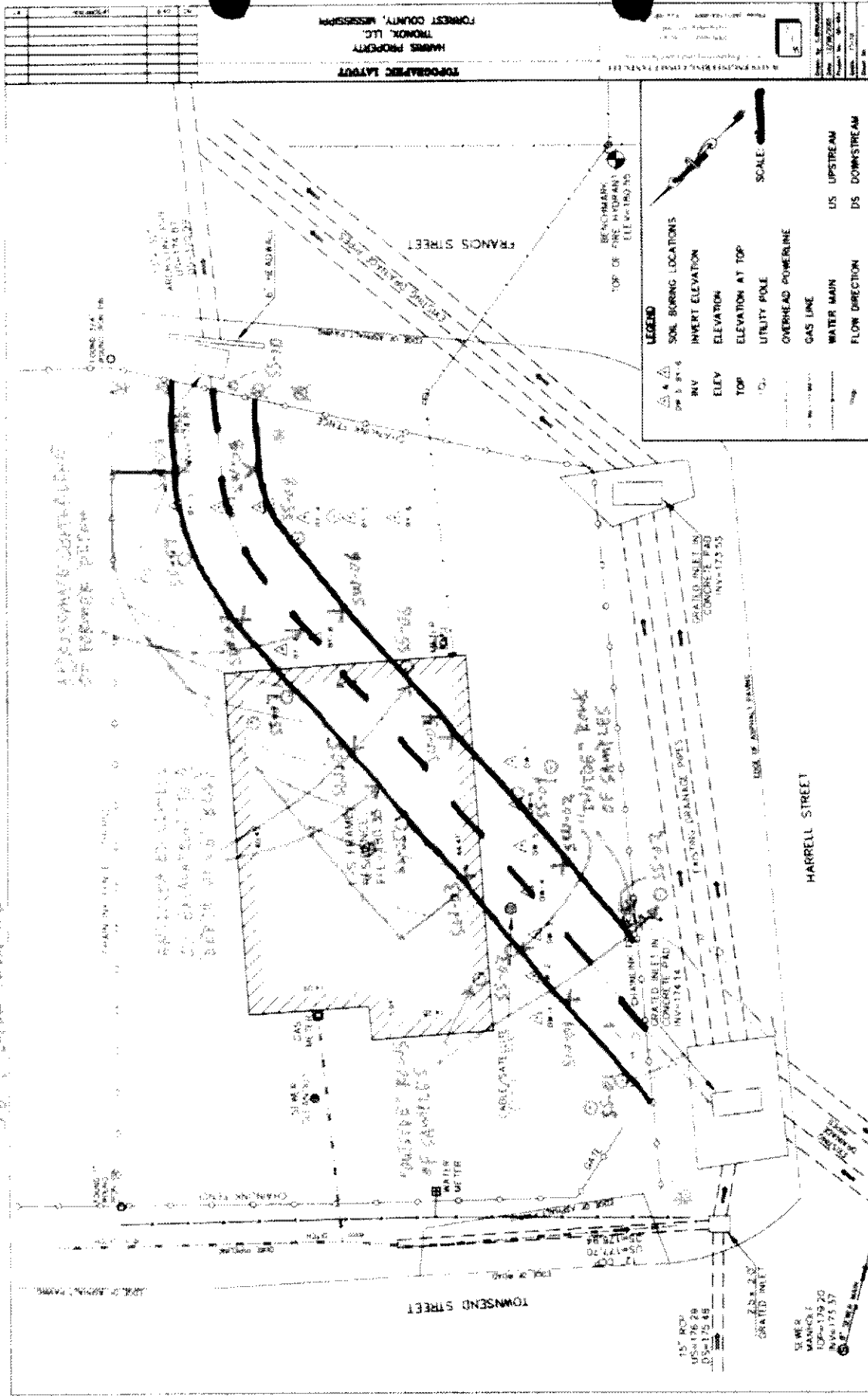
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Proposed Soil Removal Area - 116 Townsend.pdf B(a)p in Surface Soils.pdf



Benzo(a)pyrene Concentrations in Surface Soil Samples

116 Townsend Street
Hattiesburg, Mississippi

Sample ID	B(a)p (mg/kg)
116TSS-01/0-1'	2.5
116TSS-01A/0-1' ^(a)	0.066
116TSS-02/0-1'	0.42
116TSS-03/0-1'	0.16
116TSS-04/0-1'	0.15
116TSS-05/0-1'	7.9
116TSS-05A/0-1' ^(a)	6.6
116TSS-06/0-1'	0.02
116TSS-07/0-1'	6.5
116TSS-07A/0-1' ^(a)	1.6
116TSS-08/0-1'	2.1
116TSS-08A/0-1' ^(a)	0.099
116TSS-09/0-1'	3.5
116TSS-09A/0-1' ^(a)	5.0
116TSS-10/0-1'	0.017

(a) - "Step-out" from initial surface soil sample

Average of all surface soil samples = 2.44

"Boxed" sample to be removed

Average of all after removal = 0.61



"Dave Upthegrove"
<dupthegrove@ix.netcom.com>

06/19/2006 10:19 AM

To "Tony Russell" <tony_russell@deq.state.ms.us>

cc "Watson, Keith" <Keith.Watson@tronox.com>

bcc

Subject FW: Harris Property Sampling Results

Forgot to copy Keith the first time...

Tony:

We analyzed step-out samples at the five locations where benzo(a)pyrene concentrations in 0-1' samples exceeded 1 ppm (see attached table). The new data doesn't give us a lot of relief in terms of meeting MDEQ's overall target cleanup standard, but the thing that really strikes us is that there doesn't seem to be any rhyme or reason to the spatial distribution of benzo(a)pyrene in surface soils. We had the folks at NewFields look at the data from a forensics standpoint and their preliminary findings are that only the sidewall sample that contained 18 ppm exhibits the signature of creosote (see attached memo).

Tronox would like to schedule a call to discuss this on Thursday, if you and Jerry are available (both Keith and I are out of the office until then). Please let us know what time works for you, or whether we need to schedule for another date.

Thanks,

Dave

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)
dupthegrove@ix.netcom.com

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Version: 7.1.394 / Virus Database: 268.9.0/368 - Release Date: 6/16/2006

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Benzo(a)pyrene Concentrations in Soil Samples

116 Townsend Street
Hattiesburg, Mississippi

<u>Surface Soils</u>		<u>Sidewall Samples</u>	
Sample ID	B(a)p (mg/kg)	Sample ID	B(a)p (mg/kg)
116TSS-01/0-1'	2.5	116TSW-01/4-5'	1.1
116TSS-01A/0-1' ^(b)	0.066	116TSW-02/4-5'	18
116TSS-02/0-1'	0.42	116TSW-03/4-5'	1
116TSS-03/0-1'	0.16	116TSW-04/4-5'	3.1
116TSS-04/0-1'	0.15	116TSW-05/3-4'	0.27
116TSS-05/0-1'	7.9	116TSW-06/3-4'	0.18
116TSS-05A/0-1' ^(b)	6.6	116TSW-07/3-4'	0.25
116TSS-06/0-1'	0.02	116TSW-08/3-4'	0.011 J
116TSS-07/0-1'	6.5	116TSW-09/3-4'	0.0098 J
116TSS-07A/0-1' ^(b)	1.6	116TSW-10/3-4' ^(a)	0.006 J
116TSS-08/0-1'	2.1		
116TSS-08A/0-1' ^(b)	0.099		
116TSS-09/0-1'	3.5		
116TSS-09A/0-1' ^(b)	5.0		
116TSS-10/0-1'	0.017		

(a) - Duplicate of sample 116TSW-09/3-4'

(b) - "Step-out" from initial surface soil sample

Jackie Key/SW/OPC/DEQ

06/08/2006 10:31 AM

To Tony Russell/HW/OPC/DEQ@DEQ

cc

bcc

Subject Re: results needed 

aa30862 Phenanthracene 203 ug/kg (trace MQL 330)

116 TSS-03/0-1' Anthracene 137 ug/kg (trace MQL 330)

Fluoranthene 323 ug/kg (trace MQL 330)

Pyrene 242 ug/kg (trace MQL 330)

Benzo(a)pyrene 97 ug/kg (trace MQL 330)

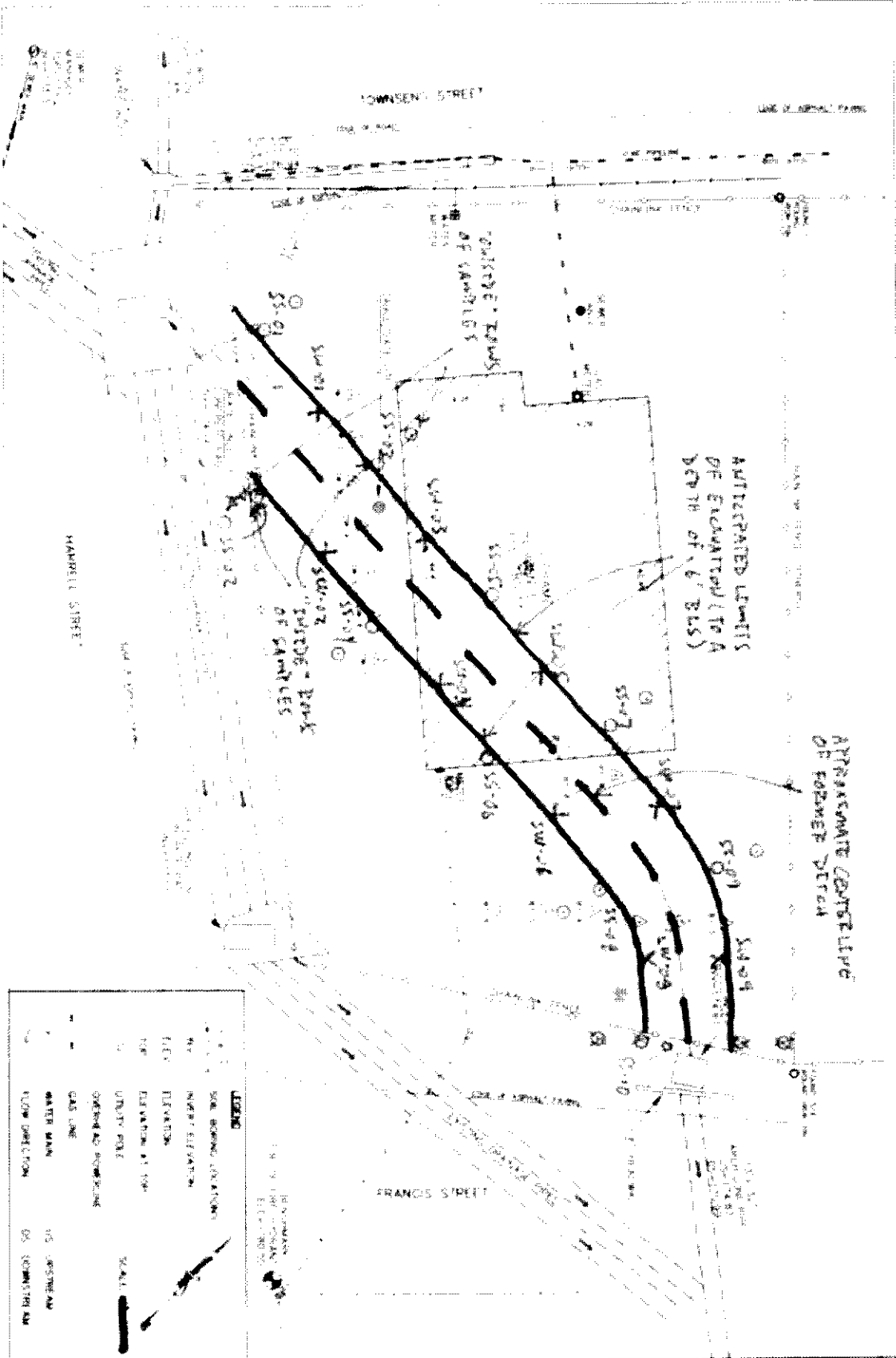
Also Benzoic Acid 312 ug/kg (trace)

Diethylphthalate 671 ug/kg (probable lab contamination - blank had 711 ug/kg)

aa30863 No PAHs detected

116 TSD-09/3-4' Diethylphthalate 662 ug/kg (see comment above)

Jackie B. Key, CPM
Organic Chemistry Supervisor
MDEQ, Laboratory
1542 Old Whitfield Rd.
Pearl, MS 39208
Phone 601 664-3921
Fax 601 664-3938



X SIDEWALK SAMPLE
 O 0-1' CIRCULAR SAMPLE

ANTICIPATED LIMITS OF EXCAVATION (TO A DEPTH OF 6' BLS)

APPROXIMATE CENTERLINE OF FORMER DITCH

LEGEND

(Symbol)	SOIL BORING LOCATION
(Symbol)	INLET ELEVATION
(Symbol)	ELV ELEVATION
(Symbol)	TOP ELEVATION AT TOP
(Symbol)	UTILITY POLE
(Symbol)	OTHER AS SHOWN
(Symbol)	SCALE
(Symbol)	CAS LINE
(Symbol)	WATER MAIN
(Symbol)	SEWER
(Symbol)	FLOW DIRECTION
(Symbol)	US (UPSTREAM)
(Symbol)	DS (DOWNSTREAM)

TOPOGRAPHIC LAYOUT
 HARRIS PROPERTY
 TRONOL, LLC
 FORREST COUNTY, MISSISSIPPI

1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40
41	42	43	44	45	46	47	48	49	50



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

MEMORANDUM

TO: Gulf States Creosote Site File
Hattiesburg, Mississippi

FROM: Tony Russell

DATE: June 12, 2006 *TR*

SUBJECT: Field Work Conducted at 116 Townsend Street

I met with Dave Upthegrove on May 15 through May 17 to observe the removal of creosote impacted soil within the old drainage ditch beneath Mr. Will Harris house and the removal of impacted soil around sewer line beneath Harrell Street. All visibly impacted soil was excavated and loaded into dump trucks for transportation to the State permitted landfill at McNeil, MS. Once the impacted soil was removed from 116 Townsend Street, confirmation samples were collected on 20 foot spacing along the ditch. The samples were collected within one foot of the surface and at approximately three to four feet below ground surface. I collected a split at location SS-03 (0 to 1 foot) and SW-09 (3 to 4 feet). The samples were delivered to OPC lab for analysis.

Photos were taken during this sampling event.

K:\Common\UCSS\Tony\Gulf States Creosote\GSC - 116 Townsend soil removal memo to file May 2006.doc

THAD COCHRAN
MISSISSIPPI

United States Senate

WASHINGTON, DC 20510-2402

COMMITTEE ON
APPROPRIATIONS
CHAIRMAN

COMMITTEE ON
AGRICULTURE, NUTRITION,
AND FORESTRY

COMMITTEE ON
RULES AND
ADMINISTRATION

May 31, 2006

Please reply to:
188 East Capitol Street
Suite 614
Jackson, Mississippi 39201-2125
(601) 965-4459
(601) 965-4919 Telefax



Mr. Charles H. Chisolm
Executive Director
Mississippi Dept. of Environmental Quality
Office of Geology
Post Office Box 20307
Jackson, Mississippi 39289-1307

Dear Mr. Chisolm:

Enclosed is correspondence sent to me by my constituents regarding toxic conditions in Hattiesburg. My Jackson office staff members have also received quite a few phone calls regarding this issue. As a courtesy to me, I would appreciate a written response at your earliest convenience.

I have also forwarded this correspondence to Environmental Protection Agency officials. Any assistance you can provide in this matter would be deeply appreciated.

Sincerely,

A handwritten signature in black ink that reads "Thad".

THAD COCHRAN
United States Senator

TC/kc

Enclosure

Coalter, Kim (Cochran)

From: REEDRCMOMS@aol.com
Sent: Friday, May 26, 2006 12:34 PM
To: Coalter, Kim (Cochran)
Cc: REEDRCMOMS@aol.com; sherrij45@zzip.cc
Subject: Kerr-McGee issues in Hattiesburg, Ms

Ms Coalter:

I have written you before but the e-mail came back. I called you a week or so ago concerning the Kerr-McGee issue in Hattiesburg. You wanted me to write you about our concerns.

Our concerns are that we have tried to get public officials involved in this helping us get justice for the black citizens involved in this case.

Kerr-McGee came in and paid H'burg Public School and the white 16th Section leaseholder for damages of an old creosote plant which they owned and did not pay the black leaseholder who were mostly impacted in the area across the tract. It seem that a railroad track alway separate blacks from white. We have seniors and childern who have been impacted by these chemicals. Some of the former residents have been diagnosed with lupus, cancer, stillbirths, cysts and may other ailments, we have also had family members to die, but at the time we did not know what was happening.

When Kerr-McGee paid these people they did a redemitation on the west side of the tract but called it ditch and drainage work on the east side. We they started the remediation procee residents in the neighborhood started to get sick and the doctors did not know what was causing the problems. They did not take any safety precautions for the children or anyone in the area.

We have been trying to get our public officials involved but we keep running into the same wall, it seems no one care about the Black voters. We only see public officials when it time to vote and after that they go into hiding.

We are asking Sen. Cochran to break the chain and get involved in this matter. We also ask they he would visit our community to see just what we are asking for and why we are seeking justice for the Black citizens in our community.

Thank you for you attention in this matter.

Carolyn Reed

Coalter, Kim (Cochran)

From: Marcia Starks [msveneestarks41@yahoo.com]
Sent: Tuesday, May 16, 2006 10:59 AM
To: Coalter, Kim (Cochran)
Cc: Sherri Jones; Carolyn Jordan; Carolyn Reed
Subject: Letter to Senator Cochran
Attachments: 1363873971-Letter to Senator Cochran.doc

Ms. Coalter:

Attached is a letter to Senator Cochran. Please have him to read it and respond as soon as possible. Again, thanks for your help.

Sincerely,

Marcia Starks, Secretary
Forrest County Environmental Support Team

Blab-away for as little as 1¢/min. Make PC-to-Phone Calls using Yahoo! Messenger with Voice.



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM**

P.O. BOX 374

HATTIESBURG, MISSISSIPPI 39403

EIN # 20-1494003

MOTTO: PSALM 51

**“Create In Me A Clean Heart, O God; And Renew A Right Spirit
With In Me”**

May 16, 2006

Senator Thad Cochran
188 East Capitol Street
Suite 614
Jackson, MS 39201

Dear Senator Cochran:

Once again the **Forrest County Environmental Support Team** is contacting your office regarding the Kerr McGee case. The last time we heard from your office was on January 11, 2006 from Ms. Kim Coalter. Three months have past and local and state officials have failed to take the necessary steps to ensure that the rights of the minority citizens are protected.

We have jumped through many hurdles to get to the point where we are now, and still haven't been able to resolve the issue with Kerr McGee. We started with our city officials and they have turned and looked the other way, until we started using legal, valid documents informing minority residents of Hattiesburg the monstrosity the **Black Lease Holders** have incurred.

You have been a Senator for over 20 years, and yet your record is vague when it comes to supporting bills and promoting lively hood here in the Black Pine Belt. The **Black Lease Holders** here in Hattiesburg have been done a terrible injustice and we are asking for you to step up to the plate and use your authority to help restore to the **Black Lease Holders** what they have been deprived of, and hold Kerr McGee, the City and the State of Hattiesburg, and attorneys pretending to represent the citizens of Hattiesburg responsible for the deception they have placed on the residents here in Hattiesburg.

Senator Thad Cochran

Page 2

May 16, 2006

Senator Cochran, we are requesting your assistance in this matter because you are an elected official with the responsibility of serving and protecting all citizens. We have a meeting scheduled with Kerr McGee the week of May 22, 2006. It is our goal to develop a relationship that will resolve this matter. We ask for any immediate attention that you may be able to provide to encourage Kerr McGee to move forward with respect, decency, and integrity. The court has granted the residents six months to resolve this matter and we have less than two months to resolve the case.

We're respectfully requesting that you become involve for two reasons: (1) our records and research will reflect a double-standard has been executed in the remediation that was performed in a tax reduction granted to white lease holders of state owned property; (2) secondly, we request a hearing before the appropriate committees, the Environmental Public Works Committee, and Judiciary Committee for the purpose of discovering if the minority residents civil rights and civil liberties have been violated. We believe that federal violations have occurred.

At the heart of our requests, we also ask that you visit our community for the purpose of touring this site to gain personal knowledge of how dangerous chemicals have caused this community to suffer for more than 50 years. Information about this site can be found under Gulf State Creosote, Hattiesburg, Mississippi. The EPA calls this site one of the second most dangerous sites in the United States. They also stated that the state had made mistakes in the handling of this matter.

We would appreciate you giving this matter your prompt attention. Thanks in advance for your assistance. We hope you will use this opportunity to improve your relationship with this community.

Sincerely,

Sherri Jones, Organizer
Forrest County Environmental Support Team

mbs/SJ

Coalter, Kim (Cochran)

From: Liddell, James (Cochran)
Sent: Monday, May 15, 2006 4:44 PM
To: Coalter, Kim (Cochran)
Subject: FW: Kerr McGee Case
Attachments: 3029009596-Letter To mayor & Council.doc

James

From: Marcia Starks [mailto:msveneestarks41@yahoo.com]
Sent: Monday, May 15, 2006 4:35 PM
To: Liddell, James (Cochran)
Cc: Sherri jones
Subject: Kerr McGee Case

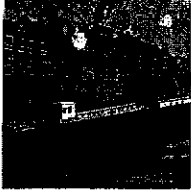
James, attached is a copy of the history of Kerr McGee. Please review with careful consideration the impact these chemicals has had on the residents here in Hattiesburg. We would like for the clean up process to stop until the EPA has a chance to come in and inspect the sites.

Should you have any more questions concerning this matter, please feel free to call Sherri Jones @ 601-441-4646 or me @ 205-370-8219. Again, thanks for your help in advance.

Sincerely,

Marcia Starks, Secretary
Forrest County Environmental Support Team (FCEST)

Yahoo! Messenger with Voice. PC-to-Phone calls for ridiculously low rates.



FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003

City of Hattiesburg
Mayor Johnny L. Dupree
Hattiesburg City Council
P. O. Box 1898
Hattiesburg, MS 39403

Dear Leaders:

RE: HISTORY OF KERR MCGEE

- 1989-Core of engineers notified MDEQ that they discovered creosote at 15 feet along Gordon Creek.
- 1993- MDEQ notified Hattiesburg public school district of their findings. Attorney J. B. Slack filed a law suit to protect the Hattiesburg public school district.
- 1996- J. B. notified the White Leaf Holders and filed to include them in the original state case.
- 1996- Kerr McGee filed to have the case dismissed on the grounds that the claim by the sub-lease holders was a duplicate claim of the school district and that the interest of the sub-lease holders were already being represented; if not, then the school district was not the proper party to bring the original action. Faced with the fact that all leaf holders should have been properly notified with this new discovery, the attorneys selected to change the style of the law suit and then used the name of a **private** business to file a new law suit. **All White Lease Holders** were properly notified and was allowed to participate in new action. Then they abandoned the state court case and directed their attention to federal court where they changed the name of the **lead plaintiff** to R.S.C.O. Realty Co. The records will reflect the Hattiesburg school district is tucked away all nice, quiet and cozy under private companies.

- 2002- Kerr McGee agreed to settle after tests and studies reflected that the remediation would venture well into the black community. In 2001, the records also reflect that the city became involved as a willing partner by obtaining easement and right a ways by advising the black residents that this was a ditch and drainage project that was being performed to prevent flooding and improve their community.
- 2002-2006- The black residents discovered the law suit in state court and filed to become a party. J. B. Slack filed to prevent the blacks from entering the state action, stating that the Black Leaf Holders should file their own separate action. Later, the Black Leaf Holders did so through attorneys Milton, Smiley, Cade, and Colom. This later proved to be a legal trap for the black residents that caused them to be locked in court while the whites attained a settlement using the **Black Lease Holders** properties as reflected in the work plan. The **Black Lease Holders** were **never** notified or allowed the right to due process. The need to notify the residents was removed in 2001 when the parties decided to use the city as a representative of the community. The City of Hattiesburg misled the **Black Lease Holders** by presenting this as a ditch and drainage project according to records. The only reason the city was solicited to become involved was to avoid notification and participation of the black property owners. This claim is supported by the fact that the city did not handle the other projects nor did the city handle a trust fund for the whites, nor did they obtain easements or right a ways from whites that leased property in the same state of Mississippi, in the same county of Forrest, and in the same city of Hattiesburg. The same 16 Section Property that all citizens pay taxes on has been segregated where white benefited and their properties have been restricted from being used as residential property. The minority leaf holders have been denied proper remediation. Previous records and the demolishing of the home of 116 Townsend, clearly proves that the black residents continue to be forced to live in an unsafe environment. We believe that the record will reflect that the Hattiesburg City Council has participated and allowed a double standard to be forced upon the minority tax payers and their community. We respectfully request that the city council immediately reposition itself and partnership with the community to resolve this matter.

Respectfully submitted,

Sherri Jones, Organizer
Forrest County Environmental Support Team

Coalter, Kim (Cochran)

From: Marcia Starks [msveneestarks41@yahoo.com]
Sent: Tuesday, May 16, 2006 10:59 AM
To: Coalter, Kim (Cochran)
Cc: Sherri Jones; Carolyn Jordan; Carolyn Reed
Subject: Letter to Senator Cochran
Attachments: 1363873971-Letter to Senator Cochran.doc

Ms. Coalter:

Attached is a letter to Senator Cochran. Please have him to read it and respond as soon as possible. Again, thanks for your help.

Sincerely,

Marcia Starks, Secretary
Forrest County Environmental Support Team

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Coalter, Kim (Cochran)

From: Marcia Starks [msveneestarks41@yahoo.com]
Sent: Tuesday, May 16, 2006 9:20 AM
To: Coalter, Kim (Cochran)
Subject: KerrMcGee
Attachments: 3029009596-Letter To mayor & Council.doc

Ms. Coalter:

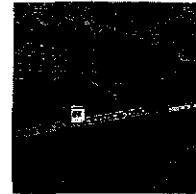
Ms. Coalter this is a follow up on the information I sent to James on yesterday concerning the Kerr McGee case. I would like to know did you receive the information? If not, I will be happy to send it to you for your review.

Attached is the information I sent to James on yesterday. For further information please contact me by email or 205-370-8219.

Sincerely,

Marcia Starks, Secretary
Forrest County Environmental Support Team

New Yahoo! Messenger with Voice. Call regular phones from your PC and save big.



**FORREST COUNTY ENVIRONMENTAL
SUPPORT TEAM
P.O. BOX 374
HATTIESBURG, MISSISSIPPI 39403
EIN # 20-1494003
MOTTO: PSALM 51**

**"Create In Me A Clean Heart, O God; And Renew A Right Spirit
With In Me"**

May 16, 2006

Senator Thad Cochran
188 East Capitol Street
Suite 614
Jackson, MS 39201

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Senator Thad Cochran

Page 2

May 16, 2006

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At the heart of our requests, we also ask that you visit our community for the purpose of touring this site to gain personal knowledge of how dangerous chemicals have caused this community to suffer for more than 50 years. Information about this site can be found under Gulf State Creosote, Hattiesburg, Mississippi. The EPA calls this site one of the second most dangerous sites in the United States. They also stated that the state had made mistakes in the handling of this matter.

We would appreciate you giving this matter your prompt attention. Thanks in advance for your assistance. We hope you will use this opportunity to improve your relationship with this community.

Sincerely,

Sherri Jones, Organizer
Forrest County Environmental Support Team

mbs/SJ

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Hattiesburg residents call for city to take

By Reuben Mees

About 20 Southeast Hattiesburg residents milled about City Hall on Tuesday, carrying signs calling for the city to take a stand in a legal battle that has pitted residents against chemical giant Tronox.

The residents were asking the city to explain its role in the lawsuit against Tronox, formerly Kerr-McGee, that has been pending since the early 1990s and the remediation phase that began in 2002.

Most recently, a home at 116 Townsend St. that sat above a creosote-contaminated drainage ditch was demolished, and there is no record of a demolition permit.

The residents also questioned how the city handles a \$2 million trust fund set up by Tronox to deal with remediation issues.

"We're just fed up and want our voice to be heard by city council and the company," Braxton Street resident James Rogers said. "We're willing to settle in a fair and equal manner. But right now our biggest concern is the city officials, and we want to

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see some accountability."

After the Tuesday city council meeting, City Attorney Charles Lawrence said he hopes to send a letter to Tronox this week expressing the city's willingness to reach an agreement suitable to residents and the company.

"I'm working on a draft and I'll probably have it finished later this week," he said. Lawrence was instructed by the council to draft the letter after a closed meeting to discuss the litigation two weeks ago.

Ward 5 City Councilman Henry Naylor said he supports the residents in their effort to reach an agreement.

"I applaud these citizens for their work," he said. "I fully support them for what they are trying to do, and like the mayor and Rep. Percy Watson, I will support them any and every way I can."

Lawrence also said in a letter the demolition at 116 Townsend St. would require a permit that would have to be obtained by either the contractor or homeowner.

Public Services Director Bennie Sellers, who has been an intermediary between Tronox and the city to complete the remediation process in the neighborhood, said he did authorize payment from the trust fund set up by Tronox to handle the work.

But he said the permit should have been obtained by either the contractor or homeowner.

Lawrence, however, said it is not uncommon for projects that require permits to be completed without obtaining a proper permit. It is a minor infraction that carries a small fine, he said.

Homeowners Will and Martha Harris, who are working with their attorney Kathleen Smiley and Tronox to resolve the case, had little to say on the matter earlier in the day Tuesday.

Unlike many of the residents who are still fighting for resolution, the Harris continued to retain Smiley while other plaintiffs fired her from their cases.

"I'm satisfied with her representation and what Kerr-McGee is doing," Will Harris said.

Debbie Schramm, a spokeswoman for Tronox, said the company is attempting to resolve the case and doing its best to make the public aware of all issues surrounding it.

She said information was disclosed publicly at the time of the first remediation and the company is disclosing information as it arises.

"From the beginning, it was primarily an environmental remediation project although it was also being done as a project to improve the city's drainage in that area," she said. "We made no attempt to hide that and all of the reports containing information have been available at the public library."

Originally published April 19, 2006



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Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:16 PM
To: Coalter, Kim (Cochran)
Cc: REEDRCMOMS@aol.com
Subject: RE:

Ms Kim we don't expect anything, when your black and live Mississippi and 45 years old you kinded understand how things work, our concerns have already been forward to the appropriate folks for the past six years and the response have been the same nobody desires to become involve, we understand that if sen Cochran response is the same, then we will simply put his name on the list with the other public officials the have no concerns about what happens in the black community. Our request is simply will he visit our community and will he help with hearing on this matter. We need a yes or no then we can decide what to do next.....thanks for your time you have been kind.....sj

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

From: Coalter, Kim (Cochran) [mailto:Kim_Coalter@cochran.senate.gov]
Sent: Thursday, May 25, 2006 8:52 AM
To: sherrij45@zzip.cc
Subject:

We can't promise anything, so please don't think we can definitely make something happen. However, I will share your concerns with the appropriate folks. Thanks!!!

From: Sherri Jones [mailto:sherrij45@zzip.cc]
Sent: Wednesday, May 24, 2006 6:10 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Thanks Ms Kim we meet this week with Kerr-McGee if we could get a little support for sen. Cochran this nightmare could be put it rest thanks for your time sj.

Patrick S. Corbett Vice President of safety and environmental affairs for Kerr-McGee was in Jackson on Monday of this week and we look forward to a good relationship with the company but we still need the support of our elected official.....

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

From: Coalter, Kim (Cochran) [mailto:Kim_Coalter@cochran.senate.gov]
Sent: Wednesday, May 24, 2006 8:01 AM
To: Sherri Jones
Subject: RE: Kim with Senator's office

'Sorry – I have so many cases, I can't remember folks right off the bat! I am collecting letters, and then I will send them all at once to the proper officials.

From: Sherri Jones [mailto:sherrij45@zzip.cc]
Sent: Tuesday, May 23, 2006 5:54 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Ms Kim I am sorry this is regarding the request from FORREST COUNTY ENVIRONMENTAL SUPPORT TEAM about a visited to our community thank you.

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

From: Coalter, Kim (Cochran)
[mailto:Kim_Coalter@cochran.senate.gov]
Sent: Tuesday, May 23, 2006 8:29 AM
To: Sherri Jones
Subject: RE: Kim with Senator's office

What is this regarding?

From: Sherri Jones [mailto:sherrij45@zzip.cc]
Sent: Monday, May 22, 2006 10:03 PM
To: Coalter, Kim (Cochran)
Subject: RE: Kim with Senator's office

Ms Kim please let use know how long it will be before we can a reply from sen. Cochran thanks.....

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

From: Coalter, Kim (Cochran)
[mailto:Kim_Coalter@cochran.senate.gov]
Sent: Wednesday, January 11, 2006 2:07 PM
To: sherrij45@zzip.cc
Subject: Kim with Senator's office

Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:19 PM
To: Coalter, Kim (Cochran)
Subject: FW: Metting in Jackson, MS

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

From: REEDRCMOMS@aol.com [mailto:REEDRCMOMS@aol.com]
Sent: Thursday, May 25, 2006 4:53 PM
To: patcorbett@tronox.com; ldickerson@tronox.com
Cc: sherrij45@zzip.cc; REEDRCMOMS@aol.com
Subject: Metting in Jackson, MS

Dear Gentlemen:

The Forrest County Environmental Support Team would first like to thank you and the Kerr-McGee Corporation for your continued efforts and concerns for what we believe have become a legal and environmental tragedy in Hattiesburg, MS, because of a lack of honesty and integrity displayed by people in positions that should have been representing both the community and Kerr-McGee. We would also like to apologize for canceling the meeting which was schooled for 7 a.m. Tuesday morning. We very much appreciate the concerns that representatives of Kerr-McGee have began to display that you have of resolving this matter. It is for these reasons the committee elected to reschedule the meeting with your company in order to allow time for continued dialogue in hope that a resolution could be agreed upon that would allow Kerr-McGee access to all necessary properties in the community to complete your project. We also hope that such an agreement will result in the immediate relocation of the residents at 106 Scooba St. and resolution with Down Home Cooking.

We however will not stop or delay pursuing all avenues that we feel is necessary and available to the community to obtain a fair and just resolution on behalf of the entire minority community who we believe the record will now reflect were excluded, mislead and misrepresented by all parties involved and denied due process. We however continue to enter into every meeting and discussion in hopes of developing a working relationship with Kerr-McGee for the sole purpose of improving the environment in our community.

We would like to thank Mr. Corbett for his extra effort in visiting our state during times where we all are concerned about our safety when we travel. We believe by his visit it displayed your interest in resolving this matter. We would also like to thank Mr. Dickerson who has continued to try to make sure that the lines of communication stays open whiten we believe will result in parties being able to find common ground that would allow both Kerr-McGee and the minority community to work toward resolution.

Last but not least we would like to thank Honorable Percy Watson who we believe possesses the ability to assist both Kerr-McGee and his constitutions in resolving this matter. The committee upon recommendation of Vermell Woods will yield a designated time an allow the participants in Monday's meeting and opportunity to resolve their issues.

We will be forwarding the representative listed above of the information and work that this committee have been and will continue to be engaged in for the purpose of resolving these issues that has plague our community for over 5 decades. Again we would like to thank all parties involved.

Forrest County Environmental Support Team

Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:23 PM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Many wait on creosote settlement

By Reuben Mees

Clevester Woods said she would gladly move from her Scooba Street home that has high levels of the carcinogen creosote.

But she said she doesn't intend to leave the home and 51 years of memories it has property and health problems caused by living there.

▼ ADVERTISEMENT ▼ "They can have it, but I have to be comfortable," she said. "Moving is shaking. I just want to make sure there is some justice."

Woods is one of numerous residents in the predominantly black southeast Hattiesburg neighborhood with Kerr-McGee, a chemical giant now known as Tronox that owns the property located in the early 20th century.

Tronox officials and Mississippi Department of Environmental Quality environmental cleanup neighborhood in recent months and are hoping to finish the cleanup by the middle of the year.

"The next phase of the plan will include remediation of the drainage ditch and sewer lines," spokeswoman Debbie Schramm said.

That is centered around a 116 Townsend St. home where the residents have already reported significant contamination in the soil.

"Some places as deep as 5 to 6 feet, but most seem to be in the top 1 to 3 feet," said the assessment and remediation division chief. "We're trying to determine where, how and how often to remove the creosote."

After the area around Townsend and Harrell is cleaned, Schramm said, they will also clean up East Side Avenue, where a contaminated drainage ditch runs behind Woods' restaurant.

But while Woods and the restaurant owners may see closure on their particular property class action lawsuit of several thousand residents, many of whom still have not accepted

"We want to see justice done for all these people," Forrest County Environmental

The company has offered to settle with clients at least twice - the first of which was an action suit. While several hundred people reportedly took this offer, many more came to a Dec. 1 hearing in U.S. District Court.

But some people still have not settled their claims and have less than six months to

To help resolve this, Jones said the group has recruited State Rep. Percy Watson with Ward 5 Councilman Henry Naylor.

"I've been talking to the organizers and talking to a couple of officials at Kerr-McGee at various stages of the discussion, but it seems both sides want to end the controversy. It's just a matter of when they should find."

Schramm said about 2,000 claims have been settled with residents in excess of \$1

But leaders of the effort in the black community say that \$1.3 million for the thousands of claims compared to the multi-million dollar settlement from an earlier case.

The previous case was filed in 1992 and settled in 2002 with the Hattiesburg Public Schools over the railroad tracks. While the settlement is not public, the school district received no significant property tax reductions immediately after the outcome.

"We want the contamination cleaned up. We want financial justice - the same justice that the Rev. Ivory Walmon, who was a longtime resident of the neighborhood.

Attorney complaints

But the environmental issues are only one aspect of the case, Woods said.

Throughout the case, Woods and numerous other residents were unsure exactly what

Kathleen Smiley of Gulfport, one of three lawyers who have been involved with the case, but the client said her lawyer has not returned calls or seen her when she visited her

"She won't return our calls and she won't see us if we go down there," Woods said. "It's a big problem for her to get up here, but she can get to Laurel where she settled a case worth \$1 million."

Smiley did not return calls for this story or other recent stories on the issue.

Woods said Smiley stopped working with large portions of the community after the

Woods produced e-mails between Smiley and Kerr-McGee in which the lawyer refused to tell Kerr-McGee officials to "hold strong" on their \$400 offer to her clients.

Woods produced documents regarding a new complaint filed two weeks ago against Smiley Wednesday to respond.

"The attorney completely disregarded and disrespected her clients," said Basil Halpern, who is volunteering to assist the local group in their fight.

"Never showing up in court at the court dates and having private phone conversations with Kerr-McGee in disregard for her clients."

But Hall said despite the problems, he believes the chemical company will do the r

"We do believe Kerr-McGee will come to an agreement and work out a resolution,
regarding the whole situation to just ignore it."

Originally published February 13, 2006



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Coalter, Kim (Cochran)

From: Sherri Jones [sherrij45@zzip.cc]
Sent: Thursday, May 25, 2006 5:23 PM
To: Coalter, Kim (Cochran)
Subject: Emailing: article

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Officials discuss Kerr-McGee suit

By Reuben Mees

Hattiesburg and Forrest County officials discussed their role Thursday in the ongoing community and a chemical giant that now owns the former Gulf States creosote plant.

Residents from an area bounded by the railroad tracks on the northwest and Marti meeting to hear from a county supervisor, two members of the county tax assessors and the Mississippi Bar Association.

▼ ADVERTISEMENT ▼ The group discussed the past and present status of a federal land area that is now known as Tronox.

The case filed by the Hattiesburg Public School District dates back to the early 1990s. Residents in the neighborhood southeast of the tracks believe they were intentionally left out of that settlement and deny the citizens their civil rights.

The school district filed the suit because it owns nearly all the land in question and

That case was settled in 2002 when the school district received almost \$4.5 million from white business owners, on the opposite side of the tracks settled for undisclosed amounts.

But the settlement also resulted in a reduction in the taxable value of the land north of the tracks. A program in the southeast neighborhood that the residents claim was done without

Bruce Templeton, chief tax assessor for Forrest County, acknowledged that he lowered the taxable value of the neighborhood after the school district paid for and submitted an environmental survey of the soil.

"We will do the same thing for this side of the tracks, but we are appraisers and as appraisers we have to follow the law," Templeton said.

"Why do we have to pay and wait for our taxes to be lowered when folks on that side of the tracks got paid?" resident James Rogers asked.



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But the residents were also incensed over the city's involvement in the lawsuit, whi

City Public Works Director Bennie Sellers, who did not attend the evening meeting intermediary between Kerr-McGee and the residents to complete the remediation | Environmental Quality.

Sellers said the city managed a \$2 million payment from the company and oversaw city is handling the current Classic Drive improvement project for University of Sou

"We acted as a conduit based on the plans and specifications agreed by Kerr-McG way I saw it the city of Hattiesburg got about \$2 million in work to improve the neig for."

But Sherri Jones, organizer of the Forrest County Environmental Support Team, sa access to the neighborhoods eliminated residents from discussions with the comp

"Going door-to-door was what they should have done in 1992," he said. "Kerr-McG residents so they partnered with the city of Hattiesburg."

Jones said recent efforts by Mayor Johnny DuPree and State Rep. Percy Watson |

"I don't think the city's role at this point is clearly defined," city attorney Charles Lav of the frustration the committee feels, but we have to look to state law to determine

Adam Kilgore, the bar association's general counsel, also described the process fo

Many residents have claimed Gulfport lawyer Kathleen Smiley has inadequately re mails to Kerr-McGee lawyers and failed to return calls or see them during visits.

While Kilgore said he could not comment on specifics of any existing or previous c to communication are not typically considered ethical violations while some of the |

Smiley did not return a telephone call seeking comment.

Kerr-McGee spokeswoman Debbie Schramm, who has denied any racial motivatio Thursday the case is continuing to advance. Contractors recently tore down a horr contamination from the soil there, she said.

Originally published March 24, 2006

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Coalter, Kim (Cochran)

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Hattiesburg residents call for city to take a stand

By Reuben Mees

About 20 Southeast Hattiesburg residents milled about City Hall on Tuesday, carrying signs calling for the city to take a stand in a legal battle that has pitted residents against chemical giant Tronox.

The residents were asking the city to explain its role in the lawsuit against Tronox, formerly Kerr-McGee, that has been pending since the early 1990s and the remediation phase that began in 2002.

▼ ADVERTISEMENT ▼ Most recently, a home at 116 Townsend St. that sat above a creosote-contaminated drainage ditch was demolished, and there is no record of a demolition permit.

The residents also questioned how the city handles a \$2 million trust fund set up by Tronox to deal with remediation issues.

"We're just fed up and want our voice to be heard by city council and the company," Braxton Street resident James Rogers said. "We're willing to settle in a fair and equal manner. But right now our biggest concern is the city officials, and we want to see some accountability."

After the Tuesday city council meeting, City Attorney Charles Lawrence said he hopes to send a letter to Tronox this week expressing the city's willingness to reach an agreement suitable to residents and the company.

"I'm working on a draft and I'll probably have it finished later this week," he said. Lawrence was instructed by the council to draft the letter after a closed meeting to discuss the litigation two weeks ago.

Ward 5 City Councilman Henry Naylor said he supports the residents in their effort to reach an agreement.

"I applaud these citizens for their work," he said. "I fully support them for what they are trying to do, and like the mayor and Rep. Percy Watson, I will support



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them any and every way I can."

Lawrence also said in a letter the demolition at 116 Townsend St. would require a permit that would have to be obtained by either the contractor or homeowner.

Public Services Director Bennie Sellers, who has been an intermediary between Tronox and the city to complete the remediation process in the neighborhood, said he did authorize payment from the trust fund set up by Tronox to handle the work.

But he said the permit should have been obtained by either the contractor or homeowner.

Lawrence, however, said it is not uncommon for projects that require permits to be completed without obtaining a proper permit. It is a minor infraction that carries a small fine, he said.

Homeowners Will and Martha Harris, who are working with their attorney Kathleen Smiley and Tronox to resolve the case, had little to say on the matter earlier in the day Tuesday.

Unlike many of the residents who are still fighting for resolution, the Harrises continued to retain Smiley while other plaintiffs fired her from their cases.

"I'm satisfied with her representation and what Kerr-McGee is doing," Will Harris said.

Debbie Schramm, a spokeswoman for Tronox, said the company is attempting to resolve the case and doing its best to make the public aware of all issues surrounding it.

She said information was disclosed publicly at the time of the first remediation and the company is disclosing information as it arises.

"From the beginning, it was primarily an environmental remediation project although it was also being done as a project to improve the city's drainage in that area," she said. "We made no attempt to hide that and all of the reports containing information have been available at the public library."

Originally published April 19, 2006



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Coalter, Kim (Cochran)

From: Davis, Brad (Cochran)
Sent: Thursday, May 25, 2006 5:34 PM
To: Coalter, Kim (Cochran)
Subject: FW: Please Help
Attachments: Letter to Pickering re Appeal of commercial demolition.doc

Kim,

Suzanne seems to always send these to me, but I'll let you take care of it.

If I can provide some assistance, please let me know.

I hope you have a good long weekend.

Brad Davis

From: Case, Suzanne (Cochran)
Sent: Tuesday, May 16, 2006 1:57 PM
To: Gatchell, Parah (Cochran); Davis, Brad (Cochran)
Subject: FW: Please Help

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

From: Harrietta Eaton [mailto:heaton@cityofpascagoula.com]
Sent: Tuesday, May 16, 2006 11:01 AM
To: Case, Suzanne (Cochran); Ward, Beverly (Cochran)
Subject: Please Help

Dear Suzanne and Beverly,

Can the office of Senator Thad Cochran please assist the City of Pascagoula with the appeals we are making toward getting FEMA to consider adding some sites that we submitted earlier to the list of approved ones for commercial demolition? With the June 30, 2006 deadline approaching, it is imperative that this matter be resolved. As you probably know, our community was impacted by the storm and unfortunately about 90% of our city went under water. I have attached to this email a letter that we sent to Congressman Pickering's office last week also trying to get his support of this. Your kind consider of this request is deeply appreciated. Can you also please forward this to Parah? I have misplaced her email address.

If you have any questions or require additional information, please do not hesitate to contact our City Manager, Kay Kell, at (228) 938-6614. She knows more about this than I do.

Sincerely

Harrietta Eaton, MPA
Director of Administration

P.O. Drawer 908
Pascagoula, MS 39568-0908
Phone: 228-762-1020 or 228-219-6726 cell

Email: heaton@cityofpascagoula.com

5/26/2006

TRONOX

Notice Regarding Continued Work in Hattiesburg Under the Oversight of the Mississippi Department of Environmental Quality May 2006

Tronox will begin remediation work at 116 Townsend Street in Hattiesburg, Miss., weather permitting, on Monday, May 15. The work, which is a continuation of the northeast drainage ditch work conducted in 2003, is being performed pursuant to Agreed Order 4539 03, dated Jan. 28, 2003, and Administrative Order 5116 06 dated March 28, 2006, under the oversight of the Mississippi Department of Environmental Quality (MDEQ).

Work also will be performed on the sanitary sewer under Harrell Street adjacent to the property at 116 Townsend Street. The work is expected to be completed in approximately two weeks, weather permitting.

Details Regarding the Project Activities

- In order to complete the work in a timely manner, Tronox anticipates contractors will work from 7 a.m. to 7 p.m. daily.
- The MDEQ has indicated that it expects to have a representative present at the site during the work.
- Tronox is working with the Hattiesburg Public Works Department to minimize the impact to traffic. During the remediation work, project vehicles (e.g., dump trucks) may result in increased vehicular traffic in the area, and the company will work with the City to identify appropriate routes for truck traffic.

Safety is Top Priority

- All workers involved in handling or removing material at the site will be trained in accordance with the Office of Safety and Health Administration (OSHA) regulation 29 CFR 1910.120. Everyone working at or visiting the site will be required to adhere to provisions of the Site Health and Safety Plan.
- For the safety of all involved, the temporarily-fenced work area will be an exclusion zone, with access limited to construction workers, MDEQ staff, City and other project-related personnel.
- As Tronox has done in previous phases of work in Hattiesburg, it will monitor ambient air quality in the work area to verify compliance with ambient air quality standards.
- If needed, Tronox will take necessary steps and implement engineering controls to minimize any unanticipated odors during the project.
- The company will implement dust-suppression measures, if needed.

Remediation Information

- Soils and sediments to be excavated are located four to six feet below the ground surface in a seam eight to ten feet wide. Tronox anticipates removal of approximately 300 cubic yards of former ditch material and soil from the 116 Townsend Street property.
- Excavated materials will be direct-loaded to trucks or roll-off boxes. No materials will be left on site. Piles of approved backfill material may be present on site during the project.
- Excavated materials will be disposed of at a secure, licensed, offsite landfill, as specified in the approved work plan.
- Upon completion of the work, Harrell Street will be repaved and the property at 116 Townsend Street will be regraded and reseeded.

For more information, please contact:

Tony Russell, MDEQ, 601-961-5318

www.tronox.com



FILE COPY

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

April 28, 2006

Mr. Keith Watson
Tronox, LLC
P. O. Box 25861
Oklahoma City, OK 73125

Re: Gulf States Creosote Site
Final Removal Action Work Plan dated April 19, 2006
Hattiesburg, Mississippi

Dear Mr. Watson:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced plan prepared by Michael Pisani & Associates, Inc. The proposed scope of work is approved. Any deviations from the approved scope of work have to be approved by MDEQ. MDEQ requires submittal of a complete report for the field work conducted as required by Administrative Order No. 5116 06 paragraph 4(E).

Please call me at 601-961-5318 or Jerry Banks at 601-961-5221 with any questions you may have regarding this matter.

Sincerely,

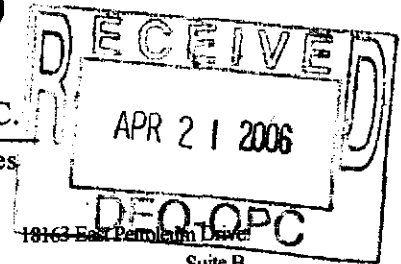
A handwritten signature in black ink that reads "Tony Russell".

Tony Russell, Chief
Assessment Remediation Branch

cc: Jerry Banks MDEQ
Mary Jacq Easley MDEQ Legal
Dave Upthegrove Michael Pisani & Associates (VIA Email Only)

K:\Common\UCSS\Tony\Gulf States Creosote\GSC deq approval of WP for 116 Townsend Street 4-28-06.doc

MICHAEL PISANI & ASSOCIATES, INC.
Environmental Management and Engineering Services



13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
Telephone (281) 242-5700
Facsimile (281) 242-1737
dangle@alltel.net

1100 Poydras Street
1430 Energy Centre
New Orleans, Louisiana 70163
Telephone (504) 582-2468
Facsimile (504) 582-2470
m.pisani@ix.netcom.com

Suite B
Baton Rouge, Louisiana 70809
Telephone (225) 755-2250
Facsimile (225) 755-2259
cmfeters@ix.netcom.com

April 20, 2006

Mr. Tony Russell
Assessment Remediation Branch
MDEQ Office of Pollution Control
101 Capitol Centre
101 W. Capitol Street
Jackson, MS 39201

Re: *Final Removal Action Work Plan*
116 Townsend Street and Harrell Street Sewer Line
Hattiesburg, Mississippi

Dear Mr. Russell:

Enclosed for your files are two copies of the referenced document. As required by MCEQ Administrative Order No. 5116 06, Tronox will begin implementation of this Work Plan within 30 days from receipt of MDEQ approval. As we have discussed, we currently plan to begin site work on May 15, 2006.

Should you have any questions or wish to discuss our upcoming response activities, please call either me or Keith Watson at (405) 775-5475.

Sincerely,

MICHAEL PISANI & ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Upthegrove".

David C. Upthegrove, P.G.

cc: Keith Watson – Tronox



FILE COPY

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

April 13, 2006

Mr. Keith Watson
Tronox, LLC
P. O. Box 25861
Oklahoma City, OK 73125

Re: Gulf States Creosote Site
Soil Sampling Analysis Plan dated April 6, 2006 and *Addendum to Removal Action Work Plan* dated April 6, 2006
Hattiesburg, Mississippi

Dear Mr. Watson:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced plans prepared by Michael Pisani & Associates, Inc. MDEQ will address each plan separately.

Soil Sampling Analysis Plan:

1. All gross material, as determined by onsite MDEQ representative, that may extend below six (6) feet shall be removed from the excavation and disposed of properly.
2. This plan shall be amended to the Removal Action Work Plan (RAWP) dated October 24, 2005.
3. MDEQ shall be notified a minimum of two weeks prior to implementation of the field work.
4. MDEQ shall be provided appropriate sample containers for any split samples collected during the scope of work.

Addendum to RAWP:

1. MDEQ requires that the trucks be loaded in a manner that eliminates the need to brush off the trucks prior to leaving the site. The heavy equipment operator should be directed to not fill the excavator bucket with so much material that it spills onto the ground or the truck sides during loading.

Mr. Keith Watson

April 13, 2006

Page 2

2. Tronox responses shall be incorporated into the RAWP dated October 24, 2005. The revised RAWP shall be stamped "Final".

Final approval is contingent on incorporation of the above requirements. Please submit the revised remedial action work plan by April 27, 2006. Please call me at 601-961-5318 or Jerry Banks at 601-961-5221 with any questions you may have regarding this matter.

Sincerely,



Tony Russell, Chief
Assessment Remediation Branch

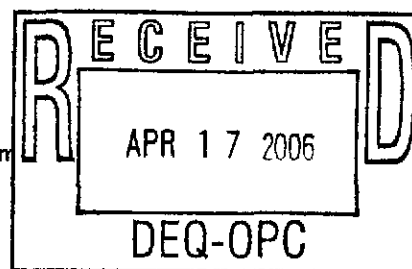
cc: Jerry Banks MDEQ
Mary Jacq Easley MDEQ Legal
Dave Upthegrove Michael Pisani & Associates

TRONOX

Name A. Keith Watson
Title Project Manager

Phone (405) 270-3747
Fax (405) 270-3980
e-mail kwatson@kmg.com

April 7, 2006



Tony Russell, Chief
Mississippi Department of Environmental Quality
Assessment Remediation Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Re: Gulf States Creosote Site
Northeast Drainage Ditch Project
Hattiesburg, Mississippi

Dear Mr. Russell:

Pursuant to the request of the Mississippi Department of Environmental Quality in the letter dated December 21, 2004, Tronox LLC is providing this status report regarding access to those parcels of land that may require further attention pursuant to the MDEQ-approved Work Plan for the Northeast Drainage Ditch.

The Harris Property. Tronox and Mr. & Mrs. Harris executed an access agreement, and the HARRISES moved out of their house in February 2006. On February 27-28, Tronox contractors demolished the house and removed the debris. Remediation of the Harris property and the associated Harrell Street sewer line will commence after submittal of the documents required under recently signed Order 5116-06.

The Bevon property. As previously reported, Mr. Bevon has agreed to provide Tronox with access to his leasehold for remediation purposes. Tronox, through local Hattiesburg counsel, sent Mr. Bevon a draft written access agreement in February.

The McCarthy (Florence 375a) property. As previously reported, Tronox has been unable to contact Mrs. McCarthy, but has spoken to her adult daughter. Based on that discussion, it appears an access agreement with the Mrs. McCarthy will be obtained. Tronox, through local Hattiesburg counsel, sent Mrs. McCarthy a draft written access agreement in February.

The Norfolk Southern right-of-way. In lieu of the recent MDEQ decision on the risk assessment methodology provided in an email of 2/21, Tronox may need to modify the remedial design for this property. Tronox and NSRR can intelligently discuss access requirements.

Tronox LLC

123 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102 • P.O. Box 268857, Oklahoma City, Oklahoma 73126-8857

Mr. Tony Russell
April 7, 2006
Page 2

The Woods and American Legion Auxiliary properties. As previously reported, a group that includes Ms. Woods and Ms. McDougal has demanded the payment of millions of dollars in exchange for the group's cooperation, including access to properties for remediation. Using a local politician as a facilitator, Tronox representatives are attempting to negotiate with these parties for more reasonable terms, but in the end, Tronox may require MDEQ intervention to resolve these access issues.

We appreciate your attention and assistance towards completion of the Northeast Drainage Ditch Work Plan. If you have any questions or comments, please call me at (405) 775-5475.

Sincerely,



A. Keith Watson
Project Manager

Copy: N. Bock
T.L. Cabbage – KM
J. Raiford – Adams & Reese
D. Shandy

MICHAEL PISANI & ASSOCIATES, INC.

Environmental Management and Engineering Services

13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
Telephone (281) 242-5700
Facsimile (281) 242-1737
dangle@alltel.net

1100 Poydras Street
1430 Energy Centre
New Orleans, Louisiana 70163
Telephone (504) 582-2468
Facsimile (504) 582-2470
m.pisani@ix.netcom.com

18163 East Petroleum Drive
Suite B
Baton Rouge, Louisiana 70809
Telephone (225) 755-2250
Facsimile (225) 755-2259
cmfletters@ix.netcom.com

April 6, 2006

Mr. Tony Russell
Assessment Remediation Branch
MDEQ Office of Pollution Control
101 Capitol Centre
101 W. Capitol Street
Jackson, MS 39201

Re: *Soil Sampling and Analysis Plan*
116 Townsend Street
Hattiesburg, Mississippi

Dear Mr. Russell:

Tronox LLC (Tronox) has completed the demolition of the residence at the referenced property and is preparing to conduct limited soil removal activities. Soil removal will be performed in accordance with procedures established in the *Removal Action Work Plan, 116 Townsend Street and Harrell Street Sewer Line* (Michael Pisani & Associates, October 24, 2005) and the *Addendum to the Removal Action Work Plan* (MP&A, April 6, 2006). This letter presents procedures for the collection and analysis of soil samples to demonstrate that after removal of affected soils, residual concentrations of polycyclic aromatic hydrocarbons (PAHs) in soils do not exceed remediation goals established by the Mississippi Department of Environmental Quality (MDEQ). This verification sampling is being required by MDEQ pursuant to an Administrative Order from the Mississippi Commission on Environmental Quality (MCEQ) dated March 28, 2006 (MCEQ Order No. 5116 06).

Project Background

In 2003, the City of Hattiesburg, with funding from Tronox predecessor Kerr-McGee Chemical LLC (KMC), completed a drainage rehabilitation project that included the removal and offsite disposal of sediment and soils containing PAHs. During excavation activities, a visibly-affected seam of material was observed extending beneath the property at 116 Townsend Street. This seam appeared to be confined to the remnant of a former ditch that was apparently filled with soil prior to residential development in the area. Due to access limitations, KMC and MDEQ agreed to address affected soils beneath the property at 116 Townsend Street at a later date.

In late 2005, Tronox and the residents of 116 Townsend Street entered into an agreement for the remediation of affected soils on the property. Once the agreement was in place, MP&A advanced 15 soil borings at 116 Townsend Street to delineate the extent of visibly-affected soils in the trace of a former ditch. The results of the boring program indicated that the seam of visibly-affected soils in the base of the former ditch appeared to extend beneath the house on the property. Visibly-affected soils were encountered at a depth of 4 to 6 feet below land surface and appeared to be confined to a channel approximately 10 feet wide.

In order to facilitate the removal of affected soils, the residents moved to temporary housing and the structure at 116 Townsend Street was demolished in February 2006. The Mississippi Commission on Environmental Quality (MCEQ) has issued an Order (MCEQ Administrative Order No. 5116 06) requiring implementation of the *Removal Action Work Plan*, as well as submittal of a Work Plan for post-remediation verification sampling. This letter is being submitted in fulfillment of that requirement.

Proposed Sampling and Analytical Program

MDEQ has ordered that Tronox collect soil samples from the sidewalls of the excavation and from the uppermost one foot of soils outside of the excavation to demonstrate that a remediation goal of 1 milligram per kilogram (mg/kg) benzo(a)pyrene is met. MDEQ and Tronox have agreed that if soils are excavated to a minimum depth of 6 feet, the base of the excavation will not require sampling. Tronox proposes to collect samples at 20-foot intervals from each sidewall at a depth coincident with visibly-affected soils. Two lines of samples will also be collected at 20-foot intervals on each side of the ditch from the zero to one-foot depth interval. Proposed sampling locations are shown on the attached figure.

The sidewall samples and the "inside" line of surface soil samples will be analyzed for polycyclic aromatic hydrocarbons (PAHs) by SW-846 Method 8270. A semivolatile extraction will be performed on samples from the "outside" line of surface soil samples. A decision regarding analyses of the "outside" line of samples will be based on the results from the "inside" line.

Data Evaluation

MDEQ has established a remediation goal of 1 mg/kg benzo(a)pyrene for the site. Tronox may calculate the 95% upper confidence limit (UCL) for benzo(a)pyrene using the verification sampling data. Pursuant to Section 601(d)(1) of *Risk Evaluation Procedures for Voluntary Cleanup and Redevelopment of Brownfield Sites* (MDEQ, February 28, 2002), no further action will be required if the 95% UCL for benzo(a)pyrene is less than the approved remediation goal of 1 mg/kg.

Mr. Tony Russell
April 6, 2006
Page 3

Should you have any questions or wish to discuss our proposed sampling program, please contact us. As required by the Order, Tronox will begin implementation of this Work Plan within 30 days of receipt of MCEQ approval.

Sincerely,

MICHAEL PISANI & ASSOCIATES, INC.

David C. Upthegrove, P.G.

cc: Jerry Banks – MDEQ
Keith Watson – Tronox

7002 2030 0004 2843 6476

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Office of Pollution Control
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Attn Tony Russell

800



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Mr. Nick Beck
 Ironay, LLC
 P. O. Box 268859
 Oklahoma City OK
 73126-8859

2. Article Number

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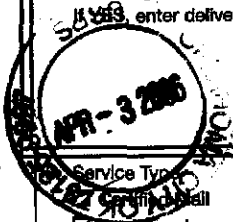
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BEFORE THE MISSISSIPPI COMMISSION
ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

COMPLAINANT

VS.

ORDER NO. **5116 06**

TRONOX LLC
ATTENTION: NICK BOCK
P. O. BOX 268859
OKLAHOMA CITY, OK 73126-8859

RESPONDENT

ORDER

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

1.

The Respondent, Tronox LLC, is subject to Miss. Code Ann. §§ 17-17-1 *et seq.* and §§ 49-17-1 *et seq.*, (Rev. 2003) and the rules and regulations of the Mississippi Commission on Environmental Quality (Commission).

2.

The Respondent has completed demolition of the residential building at 116 Townsend Street so that the creosote contaminated soil associated with the old drainage ditch beneath the residence can be remediated.

3.

On October 24, 2005, Tronox LLC submitted a work plan entitled "Removal Action Work Plan, 116 Townsend Street and Harrell Street Sewer Line, Hattiesburg, Mississippi." MDEQ responded with additional requirements by email dated October 31, 2005.

4.

Premises considered, the Executive Director finds that the Respondent must develop a work plan and conduct confirmation sampling after implementation of the previously-submitted remediation work plan.

IT IS, THEREFORE, ORDERED as follows:

- A. Within 30 days of the effective date of this Order, Respondent must submit a revised work plan incorporating the additional requirements stated in MDEQ email dated October 31, 2005, and a schedule sufficient for removal of creosote contaminated media associated with the old drainage ditch at 116 Townsend Street.
- B. Within 30 days of the effective date of this Order, Respondent must submit a work plan and schedule sufficient for post-remedial confirmation sampling associated with the old drainage ditch at 116 Townsend Street.
- C. Within 30 days of receipt of work plan approval from the Complainant, Respondent must begin implementation of the approved work plan according to the approved schedule.
- D. Respondent must complete execution of the approved work plan according to the approved schedule.
- E. Within 60 days of completion of the work plan activities the Respondent must submit to the Complainant a report detailing the findings developed as a result of implementation of the approved work plan.
- F. Respondent shall implement as necessary such interim remedial actions as are necessary to protect human health and the environment from

imminent danger.

5.

This Order does not address fines, penalties, other sanctions, further removal and/or remedial actions and/or future violations of environmental laws, rules and regulations. Nothing contained in this Order shall limit the rights of MDEQ to take enforcement or other actions against Respondent for violations addressed herein, violations not addressed herein, fines, penalties, other sanctions, further removal and/or remedial actions and/or future violations of environmental laws, rules and regulations.

6.

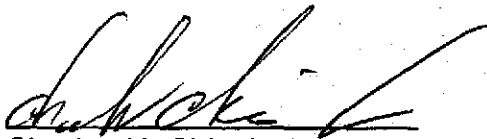
Pursuant to Miss. Code Ann. § 49-17-43 (Rev. 2003), violations of the environmental laws and regulations of the State of Mississippi can subject the Respondent to penalties totaling up to \$25,000 per day per violation. The failure to comply with this Order will be considered a continuing violation of those laws and regulations, subjecting the Respondent to further penalties of up to \$25,000 per day.

7.

If aggrieved by this Order, the 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 28th day of March, 2006.

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

BY: 
Charles H. Chisolm
EXECUTIVE DIRECTOR
MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY



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

March 29, 2006

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Mr. Nick Bock
Tronox, LLC
Post Office Box 268859
Oklahoma City, OK 73126-8859

Dear Mr. Bock:

In order to settle certain environmental issues regarding the above facility, you have agreed to the conditions of Administrative Order No. 5116 -06. A copy of the order is enclosed.

If you have any questions in this matter, please contact Mr. Tony Russell at telephone #601-961-5171.

Sincerely,

Penelope Luster for
Phil Bass, Director
Office of Pollution Control

PB:pl

Enclosure

cc: Mr. Tony Russell
Mr. Don Watts
Ms. Lucy Cresap
Ms. Mona Varner

Addendum to Removal Action Work Plan

116 Townsend Street and Harrell Street Sewer Line Hattiesburg, Mississippi

April 6, 2006

On October 24, 2005, Tronox LLC submitted a *Removal Action Work Plan* for the property at 116 Townsend Street and the Harrell Street sewer line. Mississippi Department of Environmental Quality (MDEQ) commented on the Work Plan in an October 31, 2005 email. The house at 116 Townsend Street was demolished on February 27, 2005 and was vacated within two weeks of demolition. Tronox is now prepared to complete the removal action to address affected soils on the property.

This work plan addendum provides Tronox's responses to MDEQ comments of October 31, 2005 (in bold below), and is hereby incorporated into the October 24, 2005 *Removal Action Work Plan*.

- 1. MDEQ requires confirmation samples be collected to show that contamination above 1 ppm BAP has been removed down to 6 feet below ground surface.**

Tronox is currently preparing a plan for verification sampling and will submit that document under separate cover. The verification sampling is being required by MDEQ pursuant to an Administrative Order from the Mississippi Commission on Environmental Quality (MCEQ) dated March 28, 2006 (MCEQ Order No. 5116 06).

- 2. In the area around the sewer line, all obvious (visible and odor) contamination below 6 feet will have to be removed due to construction worker scenario.**

Soil surrounding the sewer line will be excavated to a depth of 1 to 2 feet below the sewer line, or deeper if free product or creosote-saturated soils are encountered. This represents the depth to which materials would be removed during sewer line maintenance or repair. Excavated materials will be replaced with clean, compacted backfill to cover and provide a stable base for the sewer line.

- 3. Trucks must be covered when they leave the site with no loose material visible.**

All loaded trucks will be covered and any loose materials will be brushed off the trucks before leaving the site.

- 4. Air monitoring will be required during the removal process.**

Tronox will conduct air monitoring as during previous remedial activities in the former Process Area. This will consist of monitoring for organic vapors. Dust suppression measures (e.g., wetting down the work area with potable water) will also be implemented, as necessary.

5. There shall be no contaminated soils stock-piled at any time during the removal process.

Excavated soils will loaded directly into trucks for offsite transportation and disposal.

6. Who will handle replacing the old sewer line as it is removed? As I recall it was very brittle.

As during previous soil removal activities, the remedial contractor will work with the City of Hattiesburg Public Services Department to replace cracked or broken sewer line.

7. If it is known ahead of time that the material to be excavated will contain free liquids, then the stabilizing agent should be onsite.

Free liquids are not anticipated in the areas to be excavated. However, arrangements will be made in advance with a Hattiesburg-based vendor of bed ash, in case any free liquids or saturated soils requiring stabilization are encountered.

CITY COUNCIL

Ken E. Miller	Ward One
Delbert Deane	Ward Two
Casey Purvis	Ward Three
C. E. "Red" Bailey	Ward Four
Leah D. Naylor	Ward Five



Post Office Box 1993
Hattiesburg, Mississippi 39403-1996

Johnny L. DuPree, Mayor

FAX COVER SHEET

601 961-5300

FROM: Mayor Johnny L. DuPree

PHONE: (601) 545-4501

FAX: (601) 545-4608

E-MAIL: mayor@hattiesburgms.com

TO: Gloria Tatum Tony Russell
MDEQ 601.961.5187

NUMBER OF PAGES BEING TRANSMITTED (INCLUDING COVER): 2

MESSAGE:

IF YOU HAVE PROBLEMS RECEIVING THIS FAX, PLEASE CALL (601) 545-4501.

House of Representatives
Ways & Means Committee
New Capitol Room 201
Jackson, MS 39205

C.C. Mayor Johnnie Dupree
Kerr-McGee Chemical LLC

Dear Rep. Watson:

Thank you for taking my call on Saturday, March 11, 2006. We again thank you for your efforts and your commitment in your attempts to help us resolve what has become a complex matter for your constituents. I advised you Saturday that we had contacted Kerr-McGee to get the work plan that would reflect the work they intend to perform on Mrs. Woods property, should they be granted access. We also, have recently become concerned about damages to her property from work that has already been performed. Since the time of our request to Kerr-McGee the City Engineer Benny Sellers visited Mrs. Woods home on Friday, March 10, and she advised us that he informed her that her property is in fact a health hazard and that he would immediately communicate this information to Kerr-McGee.

Rep. Watson we believe the City's new position will support our allegations that the complete project is in fact sub-standard work that was camouflaged as a City Ditch and Drainage Project and the work that was performed never met the criteria of Remediation. This is also reflected in the easements that were presented to the residents that doesn't disclose Kerr-McGee or the City intent to perform any remediation. The number of errors that the committees have been able to bring to the attention of professionals that have been in charge of this project should clearly reflect their incompetence to handle a project such as this or their lack of concern for the citizens for which the project had impacted.

We again respectfully request that Mrs. Clevester Woods a senior citizen the age of 82 years old, a pillar of this community be immediately relocated in order to free her from known dangerous chemicals that all agencies and public officials have been properly notified about the levels that exceeds Government regulations. We also ask that the Woods and Down Home Cooking property be reassessed.

Respectfully yours,

Forrest County Environmental Support Team

3/22/2006



Jerry Banks/HW/OPC/DEQ
03/21/2006 10:06 AM

To Nick.Bock@tronox.com, Keith.Watson@tronox.com,
dupthegrove@ix.netcom.com
cc Tony Russell/HW/OPC/DEQ@DEQ

bcc

Subject Use of 95th UCL

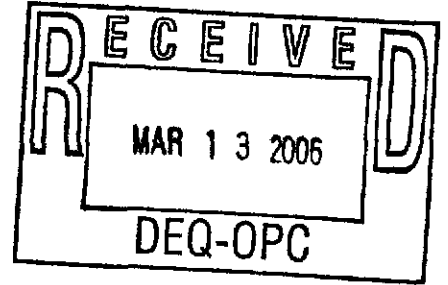
Tony just told me that he got a call from Dave about using the 95th UCL. I just want to make our position clear on the use of the 95th UCL. We **ONLY** use this methodology after remediation of the site and confirmatory sampling. We have **NEVER** used the 95th UCL prior to remediation of a site to determine what areas of contamination to remove and knowingly leave areas of contamination in place with no intent to remediate and we are not going to do it now. This is not consistent with our charge of protection of human health and the environment. The use of the 95th UCL after remediation provides the entity conducting the cleanup with some latitude if the proposed remediation does not remove all the contamination as expected and also provides the department with assurance that the contamination left in place does not pose a threat to human health or the environment

TRONOX

Name A. Keith Watson
Title Project Manager

Phone (405) 270-3747
Fax (405) 270-3980
e-mail kwatson@kmg.com

March 7, 2006



Tony Russell, Chief
Mississippi Department of Environmental Quality
Assessment Remediation Branch
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Re: Gulf States Creosote Site
Northeast Drainage Ditch Project
Hattiesburg, Mississippi

Dear Mr. Russell:

Pursuant to the request of the Mississippi Department of Environmental Quality in the letter dated December 21, 2004, Tronox LLC is providing this status report regarding access to those parcels of land that may require further attention pursuant to the MDEQ-approved Work Plan for the Northeast Drainage Ditch.

The Harris Property. Tronox and Mr. & Mrs. Harris executed an access agreement, and the Harrises moved out of their house in February 2006. On February 27-28, Tronox contractors demolished the house and removed the debris. Remediation of the Harris property and the associated Harrell Street sewer line will commence after receipt of MDEQ approval of the Harris property remediation plan.

The Bevon property. As previously reported, Mr. Bevon has agreed to provide Tronox with access to his leasehold for remediation purposes. Tronox, through local Hattiesburg counsel, sent Mr. Bevon a draft written access agreement in February.

The McCarthy (Florence 375a) property. As previously reported, Tronox has been unable to contact Mrs. McCarthy, but has spoken to her adult daughter. Based on that discussion, it appears an access agreement with the Mrs. McCarthy will be obtained. Tronox, through local Hattiesburg counsel, sent Mrs. McCarthy a draft written access agreement in February.

The Norfolk Southern right-of-way. Tronox is awaiting final MDEQ approval of the risk assessment methodology provided in an email of 2/21. This will drive the soils needing remediation and with this information, Tronox and NSRR can intelligently discuss access requirements.

Tronox LLC

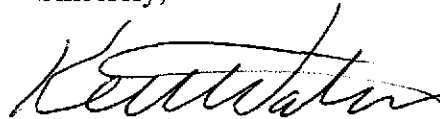
123 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102 • P.O. Box 268857, Oklahoma City, Oklahoma 73126-8857

Mr. Tony Russell
March 7, 2006
Page 2

The Woods and American Legion Auxiliary properties. As previously reported, a group that includes Ms. Woods and Ms. McDougal has demanded the payment of millions of dollars in exchange for the group's cooperation, including access to properties for remediation. Tronox representatives are attempting to negotiate with these parties for more reasonable terms, but in the end, Tronox may require MDEQ intervention to resolve these access issues.

We appreciate your attention and assistance towards completion of the Northeast Drainage Ditch Work Plan. If you have any questions or comments, please call me at (405) 775-5475.

Sincerely,



A. Keith Watson
Project Manager

Copy: N. Bock
T.L. Cabbage – KM
J. Raiford – Adams & Reese
D. Shandy

2/27/06

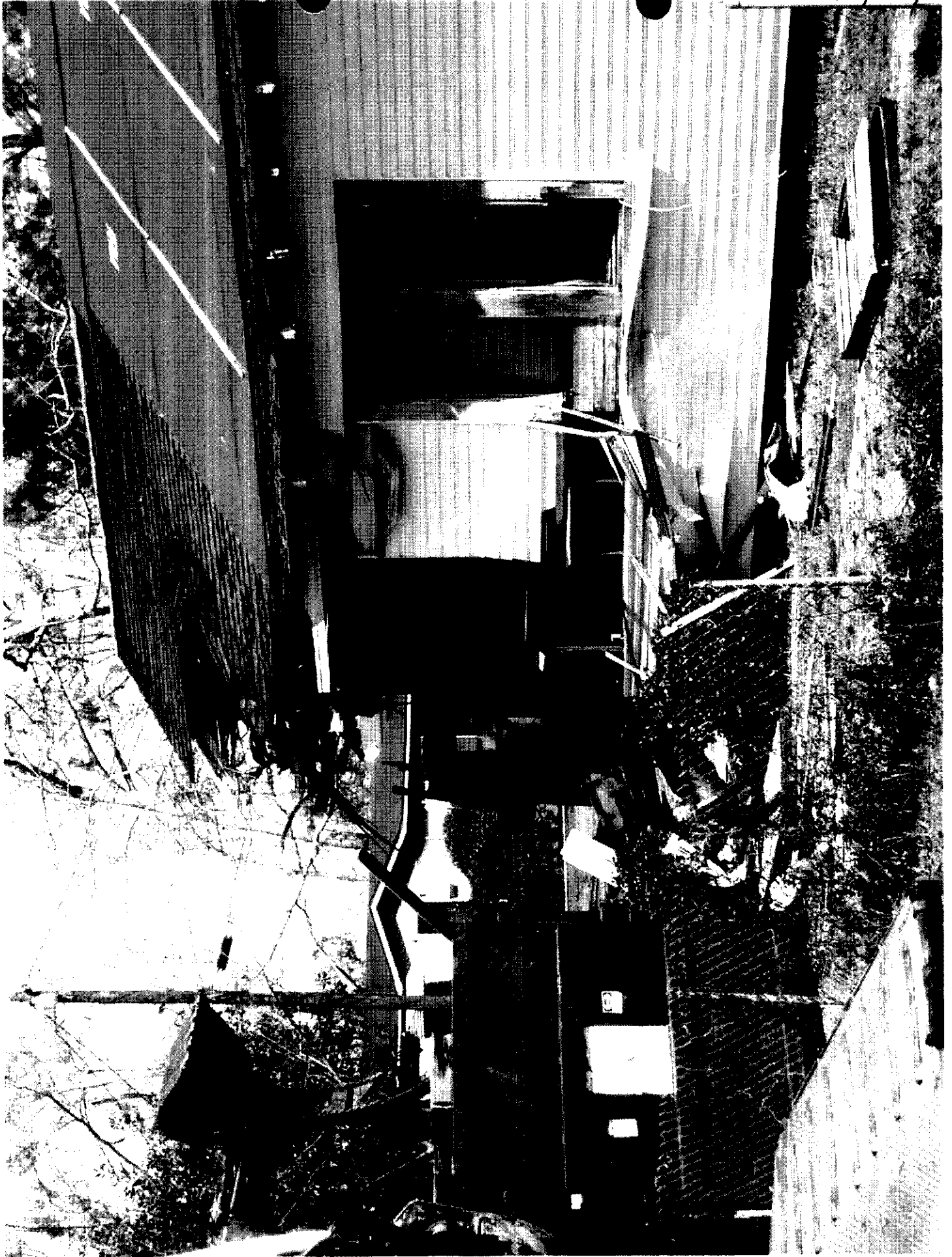
Harris Property



2/27/06
Harris Property



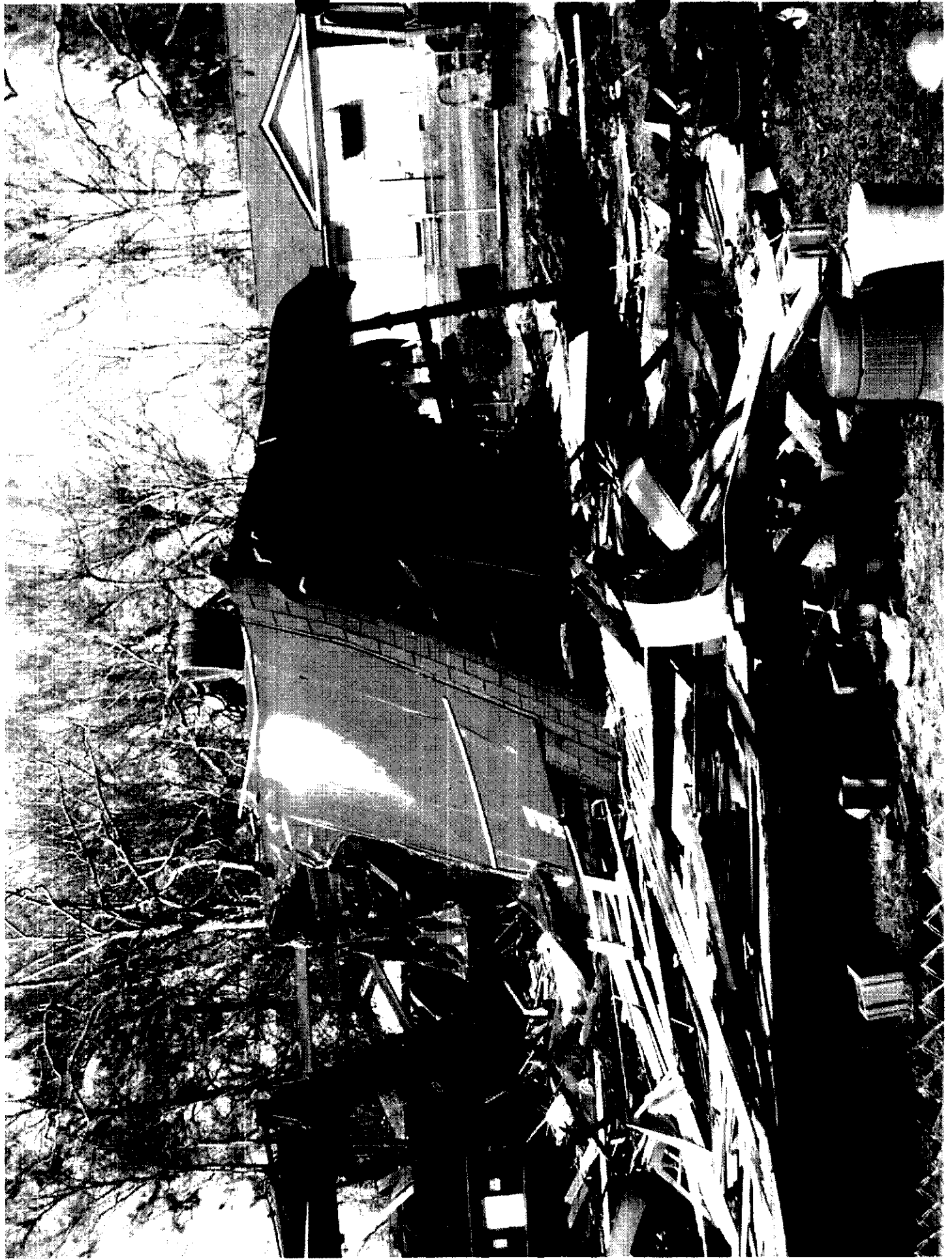
2/27/06
Harris Property



2/27/06
Harris Property



2/27/06
Harris Property



2/27/06
Harris Property





"Dave Upthegrove"
<dupthegrove@ix.netcom.com>

01/13/2006 02:44 PM

To "Tony Russell" <tony_russell@deq.state.ms.us>

cc "Keith Watson" <keith.watson@tronox.com>

bcc

Subject Revised Risk Assessment Addendum

Tony:

Attached is the revised Environmental Standards risk assessment addendum addressing soils in the area between Courtesy Ford and the Southern Railroad tracks. Once you've had an opportunity to review, please contact me with any questions or comments.

Regards,

Dave

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)
dupthegrove@ix.netcom.com

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December 30, 2005

David Upthegrove
Michael Pisani & Associates
1100 Poydras Street
1430 Energy Centre
New Orleans, LA 70163

Re: Calculation of Site-Specific Cleanup Standards
Hattiesburg, Mississippi

Dear Mr. Upthegrove:

This letter represents a re-submittal of the letter report addressed to you dated November 23, 2005. After discussions with the Mississippi Department of Environmental Quality (MDEQ), it was discovered that the cleanup standard calculations presented in the November 23, 2005 letter were *erroneous*. The source of the calculation error was identified and has been corrected in this submittal. Additionally, the original calculations in the November 23, 2005 letter were based on a target cancer risk level of 1×10^{-6} for carcinogenic compounds. This risk level represents the conservative end of the United States Environmental Protection Agency's (US EPA's) target risk range of 1×10^{-4} to 1×10^{-6} . The cleanup standards presented herein are based on a target risk level of 1×10^{-5} for carcinogenic compounds. This 1×10^{-5} risk level remains protective of human health and is also more appropriate for the subject property, which is relatively unattractive for any type of use and to which access is limited on three sides. Your past discussions with the MDEQ have indicated that 1×10^{-5} would be an acceptable target risk level for use at the property. The following text summarizes the cleanup standard calculations.

The property associated with the former Gulf States Creosoting facility in Hattiesburg, Mississippi, has been environmentally affected by historical use as the site of a wood preserving operation. Environmental Standards, Inc. (Environmental Standards) has calculated risk-based site-specific cleanup standards for a 0.9-acre portion of land located in the northeast corner of the former Gulf States Creosoting facility property. Specifically, the subject property is situated between the back of the Courtesy Ford automobile dealership and adjacent railroad tracks (the "site," Figure 1), and access to the site is limited on three sides by a ditch, a fence, and railroad tracks. The site is an unattractive, overgrown, grassy area of little or no recreational value that was evaluated as Exposure Unit 4 (EU4) in a risk assessment developed in 2001 by Environmental Standards and subsequently approved by the US EPA and MDEQ.

Site-specific cleanup standards were developed for hypothetical maintenance workers, construction workers, and adolescent trespassers (aged 7 to 16 years) who may have limited access to the site for occupational or recreational purposes. The constituents of potential concern (COPCs) evaluated included acenaphthene, acenaphthylene, anthracene,

benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenz(a,h)anthracene, fluoranthene, fluorene, indeno(1,2,3-cd)pyrene, naphthalene, phenanthrene, and pyrene.

The cleanup standards were calculated based on US EPA and MDEQ guidance and included many of the assumptions used in the US EPA-approved risk assessment developed for the former Gulf States Creosoting site in 2001 (Environmental Standards, 2001). The following table summarizes the exposure assumptions used in each of the exposure models evaluated herein.

Exposure Parameter	Maintenance Worker	Construction Worker	Adolescent Trespasser
Soil ingestion rate (mg/day)	100	480	100
Inhalation rate (m ³ /day)	NA	20	NA
Soil adherence factor (mg/cm ²)	0.038	0.1	0.026
Dermal absorption factor (semivolatiles)	0.1	0.1	0.1
Dermal absorption factor (benzo(a)pyrene)	0.03	0.03	0.03
Exposure frequency (days/year)	12	4	12
Exposure duration (years)	25	1	10
Averaging time (noncarcinogens, days)	9,125	365	3,650
Averaging time (carcinogens, days)	25,550	25,550	25,550
Target hazard quotient	1.0	1.0	1.0
Target cancer risk	1×10 ⁻⁵	1×10 ⁻⁵	1×10 ⁻⁵
Exposed skin surface area (cm ²)	3,000	5,560	3,052
Body weight (kg)	70	70	45

The values presented in the above table were derived from either the 2001 Human Health Risk Assessment report for the site (Environmental Standards, 2001), US EPA Region IV risk assessment guidance (US EPA, 2000), US EPA Region III Risk-Based Concentration Table Technical Background Document (US EPA, 2003), US EPA *Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites* (US EPA, 2002), or MDEQ risk evaluation regulations (MDEQ, 2002). The specific sources of each exposure parameter for each exposure scenario are provided on Tables 1 through 6.

The maintenance worker, construction worker, and adolescent trespasser scenarios were evaluated for dermal and oral exposures to site soil. The construction worker scenario also included potential inhalation exposures to COPCs adsorbed onto fugitive dust.

Toxicity values (oral and inhalation reference doses [RfDs] and cancer slope factors [CSFs]) were extracted from the Oak Ridge National Laboratory (ORNL) Risk Assessment Information System (RAIS) and are current as of 2005. The ORNL RAIS also publishes peer-reviewed, provisional dermal RfDs and CSFs that were used to develop dermal cleanup standards for each scenario. Chronic exposures to maintenance workers and trespassers were evaluated using chronic RfDs while subchronic exposures to construction workers were evaluated using subchronic RfDs. Site-specific cleanup standards could not be calculated for acenaphthylene, benzo(g,h,i)perylene, and phenanthrene due to the lack of published toxicity values for these compounds.

Site-specific cleanup standards were developed based on a carcinogenic risk level of 1×10^{-5} for each carcinogen or a hazard quotient of 1.0 for noncarcinogenic effects. The algorithms used to calculate the noncarcinogenic effects and carcinogen cleanup standards for each COPC, exposure route, and receptor are presented on Tables 1 through 6. The most restrictive cleanup criterium calculated across each of the exposure pathways for each receptor for either noncarcinogenic or carcinogenic effects was determined to be the site-specific cleanup standard for the area in question. The site-specific cleanup standards are summarized on Table 7.

References

Environmental Standards. 2001. Human Health Risk Assessment for the Former Gulf States Creosoting Facility, Hattiesburg, Mississippi. Valley Forge, PA. March 1, 2001.

MDEQ. February 2002. Final Regulations Governing Brownfield Voluntary Cleanup and Redevelopment in Mississippi.

ORNL Risk Assessment Information System (RAIS). Chemical-Specific Toxicity Values. http://risk.lsd.ornl.gov/tox/tox_values.shtml. June 2004.

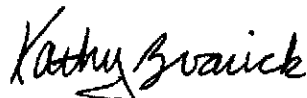
US EPA. 2000. Supplemental Guidance to RAGS: Region 4 Bulletins, Human Health Risk Assessment Bulletins. EPA Region 4, originally published November 1995, Website version last updated May 2000:
<http://www.epa.gov/region4/waste/oftecser/healthbul.htm>.]

US EPA. December 2002. Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites. Office of Solid Waste and Emergency Response. OSWER 9355.4-24. Washington D.C.

US EPA. April 2003. Region III. Risk-Based Concentration Table Technical Background Document. Office of RCRA Technical & Program Support Branch. Philadelphia, PA.

Feel free to contact me if you have any questions regarding the information presented above. I can be reached by phone at 610-935-5577 or by email at kzvarick@envystd.com.

Sincerely,



Kathy Zvarick, M.S.
Manager
Toxicology and Risk Assessment

KAZ\kz
Attachments

Table 1
Site-Specific Soil Standards for the Maintenance Worker - Noncarcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$C_{s_{nc}} = \frac{THQ \cdot BW \cdot AT_n}{(EF \cdot ED) \cdot \left(\left(\frac{1}{RfD_{cd}} \right) \cdot SA \cdot ABS_{pah} \cdot AH \cdot CF \right) + (IngR \cdot \left(\frac{1}{RfD_{co}} \right) \cdot CF)}$			
$C_{s_{nc}}$ - Site-Specific Soil Standard - noncarcinogenic effects =	mg/kg	chemical specific	
THQ - Target hazard quotient =	unitless	1	MDEQ, 2002
BW - Body weight =	kg	70	US EPA 1995, Region IV
AT_n - Averaging time - noncarcinogenic =	days	9125	US EPA 2005, Region III
EF - Exposure frequency =	days/year	12	reasonable maximum
ED - Exposure duration =	years	25	US EPA 1995, Region IV
RfD_{cd} - Dermal Chronic RfD =	mg/kg-day	chemical specific	see below
ABS_{pap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001
AH - Adherence factor =	mg/cm ²	0.038	ESI, 2001
SA - Surface area available for exposure =	cm ²	3000	ESI, 2001
CF - Conversion factor =	kg/mg	1.00E-06	
IngR - Ingestion rate =	mg/day	100	US EPA 2005, Region III
RfD_{co} - Oral chronic RfD =	mg/kg-day	chemical specific	see below

Constituent	Site-Specific Soil Standard - Noncarc. mg/kg	Dermal Chronic RfD mg/kg-day	Oral Chronic RfD mg/kg-day
Semivolatiles			
Acenaphthene	9.34E+05	1.86E-02	6.00E-02
Acenaphthylene	NA	NA	NA
Anthracene	5.55E+06	2.28E-01	3.00E-01
Benzo(a)anthracene	NA	NA	NA
Benzo(a)pyrene	NA	NA	NA
Benzo(b)fluoranthene	NA	NA	NA
Benzo(g,h,i)perylene	NA	NA	NA
Benzo(k)fluoranthene	NA	NA	NA
Chrysene	NA	NA	NA
Dibenzo(a,h)anthracene	NA	NA	NA
Fluoranthene	6.23E+05	0.0124	4.00E-02
Fluorene	6.94E+05	0.02	4.00E-02
Indeno(1,2,3-cd)pyrene	NA	NA	NA
Naphthalene	3.73E+05	0.016	2.00E-02
Phenanthrene	NA	NA	NA
Pyrene	4.67E+05	0.0093	3.00E-02

NA - Not Available

Table 2
Site-Specific Soil Standards for a Maintenance Worker - Carcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$Cs_c = \frac{TR \cdot BW \cdot AT_c}{(EF \cdot ED) \cdot ((CSF_d \cdot SA \cdot ABS \cdot AH \cdot CF) + (CSF_o \cdot IngR \cdot CF))}$			
Cs_c - Site-Specific Soil Standard - carcinogenic effects =	mg/kg	chemical specific	
TR - Target risk level =	unitless	1.00E-05	MDEQ, 2002
BW - Body weight =	kg	70	US EPA 1995, Region IV
AT_c - Averaging time - carcinogenic =	days	25550	US EPA 2005, Region III
EF - Exposure frequency =	days/year	12	reasonable maximum
ED - Exposure duration =	years	25	US EPA 1995, Region IV
CSF_d - Dermal cancer slope factor =	1/(mg/kg-day)	chemical specific	see below
SA - Surface area available for exposure =	cm ²	3000	ESI, 2001
ABS_{bap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001
AH - Adherence factor =	mg/cm ²	0.038	ESI, 2001
CF - Conversion factor =	kg/mg	1.00E-06	
CSF_o - Oral cancer slope factor =	1/(mg/kg-day)	chemical specific	see below
IngR - Ingestion rate =	mg/day	100	US EPA 2005, Region III
Constituent	Site-Specific Soil Standard - Carc. mg/kg	Dermal Cancer Slope Factor 1/(mg/kg-day)	Oral Cancer Slope Factor 1/(mg/kg-day)
Semivolatiles			
Benzo(a)anthracene	5.97E+02	2.35E+00	7.30E-01
Benzo(a)pyrene	7.36E+01	2.35E+01	7.30E+00
Benzo(b)fluoranthene	5.97E+02	2.35E+00	7.30E-01
Benzo(k)fluoranthene	5.97E+03	2.35E-01	7.30E-02
Chrysene	5.97E+04	2.35E-02	7.30E-03
Dibenzo(a,h)anthracene	5.97E+01	2.35E+01	7.30E+00
Indeno(1,2,3-cd)pyrene	5.97E+02	2.35E+00	7.30E-01

Table 3
Site-Specific Soil Standards for the Construction Worker - Noncarcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$CS_{nc} = \frac{THQ \cdot BW \cdot AT_n}{(EF \cdot ED) \cdot \left(\left(\frac{1}{RfD_{dod}} \right) \cdot SA \cdot ABS \cdot AH \cdot CF \right) + \left(\left(\frac{1}{RfD_{did}} \right) \cdot InhR \cdot \left(\frac{1}{PEF} \right) \right) + \left(IngR \cdot \left(\frac{1}{RfD_{ood}} \right) \cdot CF \right)}$				
CS_{nc} - Site-Specific Soil Standard - noncarcinogenic effects =	mg/kg	chemical specific	see below	
THQ - Target hazard quotient =	unitless	1	MDEQ, 2002	
BW - Body weight =	kg	70	US EPA 1995, Region IV	
AT_n - Averaging time - noncarcinogenic =	days	365	US EPA 2005, Region III	
EF - Exposure frequency =	days/year	4	reasonable maximum	
ED - Exposure duration =	years	1	US EPA 1995, Region IV	
RfD_{dod} - Dermal chronic RfD =	mg/kg-day	chemical specific	see below	
ABS_{bap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001	
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001	
AH - Adherence factor =	mg/cm ²	0.1	ESI, 2001	
SA - Surface area available for exposure =	cm ²	5560	ESI, 2001	
CF - Conversion factor =	kg/mg	1.00E-06		
RfD_{di} - Inhalation chronic RfD =	mg/kg-day	chemical specific	see below	
InhR - Inhalation rate =	m ³ /day	20	US EPA 1995, Region IV	
PEF - Particulate emission factor =	m ³ /kg	1.36E+09	US EPA 2002, SSL	
IngR - Ingestion rate =	mg/day	480	US EPA 2005, Region III	
RfD_{oo} - Oral chronic RfD =	mg/kg-day	chemical specific	see below	

Constituent	Site-Specific Soil Standard - Noncarc. mg/kg	Dermal Subchronic RfD mg/kg-day	Oral Subchronic RfD mg/kg-day	Inhalation Subchronic RfD mg/kg-day
Semivolatiles				
Acenaphthene	5.81E+06	1.86E-01	6.00E-01	NA
Acenaphthylene	NA	NA	NA	NA
Anthracene	3.46E+07	2.28E+00	3.00E+00	NA
Benzo(a)anthracene	NA	NA	NA	NA
Benzo(a)pyrene	NA	NA	NA	NA
Benzo(b)fluoranthene	NA	NA	NA	NA
Benzo(g,h,i)perylene	NA	NA	NA	NA
Benzo(k)fluoranthene	NA	NA	NA	NA
Chrysene	NA	NA	NA	NA
Dibenzo(a,h)anthracene	NA	NA	NA	NA
Fluoranthene	3.88E+06	1.24E-01	4.00E-01	NA
Fluorene	4.32E+06	2.00E-01	4.00E-01	NA
Indeno(1,2,3-cd)pyrene	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA
Phenanthrene	NA	NA	NA	NA
Pyrene	2.91E+06	9.30E-02	3.00E-01	NA

NA - Not Available

Table 4
Site-Specific Soil Standards for a Construction Worker - Carcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$Cs_c = \frac{TR \cdot BW \cdot AT_c}{(EF \cdot ED) \cdot ((CSF_d \cdot SA \cdot ABS \cdot AH \cdot CF) + (CSF_i \cdot InhR \cdot (1/PEF)) + (CSF_o \cdot IngR \cdot CF))}$				
Cs_c - Site-Specific Soil Standard - carcinogenic effects =	mg/kg	chemical specific	see below	
TR - Target risk level =	unitless	1.00E-05	MDEQ, 2002	
BW - Body weight =	kg	70	US EPA 1995, Region IV	
AT_c - Averaging time - carcinogenic =	days	25550	US EPA 2005, Region III	
EF - Exposure frequency =	days/year	4	reasonable maximum	
ED - Exposure duration =	years	1	US EPA 1995, Region IV	
CSF_d - Dermal cancer slope factor =	1/(mg/kg-day)	chemical specific	see below	
SA - Surface area available for exposure =	cm ²	5560	ESI, 2001	
ABS_{pap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001	
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001	
AH - Adherence factor =	mg/cm ²	0.1	ESI, 2001	
CF - Conversion factor =	kg/mg	1.00E-06		
CSF_o - Oral cancer slope factor =	1/(mg/kg-day)	chemical specific	see below	
IngR - Ingestion rate =	mg/day	480	US EPA 2005, Region III	
PEF - Particulate emission factor =	m ³ /kg	1.36E+09	US EPA 2002, SSL	
CSF_i - Inhalation cancer slope factor =	1/(mg/kg-day)	chemical specific	see below	
InhR - Inhalation rate =	m ³ /shift	20	US EPA 1995, Region IV	

Constituent	Site-Specific Soil Standard - Carc. mg/kg	Dermal Cancer Slope Factor 1/(mg/kg-day)	Oral Cancer Slope Factor 1/(mg/kg-day)	Inhalation Cancer Slope Factor 1/(mg/kg-day)
Semivolatiles				
Benzo(a)anthracene	9.29E+03	2.35E+00	7.30E-01	3.08E-01
Benzo(a)pyrene	1.15E+03	2.35E+01	7.30E+00	3.08E+00
Benzo(b)fluoranthene	9.29E+03	2.35E+00	7.30E-01	3.08E-01
Benzo(k)fluoranthene	9.29E+04	2.35E-01	7.30E-02	3.08E-02
Chrysene	9.29E+05	2.35E-02	7.30E-03	3.08E-03
Dibenzo(a,h)anthracene	9.29E+02	2.35E+01	7.30E+00	3.08E+00
Indeno(1,2,3-cd)pyrene	9.29E+03	2.35E+00	7.30E-01	3.08E-01

Table 5
Site-Specific Soil Standards for the Trespasser - Noncarcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$C_{s_{nc}} = \frac{THQ \cdot BW \cdot AT_n}{(EF \cdot ED) \cdot \left(\left(\frac{1}{RfD_{od}} \right) \cdot SA \cdot ABS \cdot AH \cdot CF \right) + \left(\text{Ingr} \cdot \left(\frac{1}{RfD_{oo}} \right) \cdot CF \right)}$			
$C_{s_{nc}}$ - Site-Specific Soil Standard - noncarcinogenic effects =	mg/kg	chemical specific	see below
THQ - Target hazard quotient =	unitless	1	MDEQ, 2002
BW - Body weight =	kg	45	US EPA 1995, Region IV
AT_n - Averaging time - noncarcinogenic =	days	3650	US EPA 2005, Region III
EF - Exposure frequency =	days/year	12	reasonable maximum
ED - Exposure duration =	years	10	US EPA 1995, Region IV
RfD_{od} - Dermal Chronic RfD =	mg/kg-day	chemical specific	see below
ABS_{bap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001
AH - Adherence factor =	mg/cm ²	0.026	ESI, 2001
SA - Surface area available for exposure =	cm ²	3052	ESI, 2001
CF - Conversion factor =	kg/mg	1.00E-06	
Ingr - Ingestion rate =	mg/day	100	ESI, 2001
RfD_{oo} - Oral chronic RfD =	mg/kg-day	chemical specific	see below

Constituent	Site-Specific Soil Standard - Noncarc. mg/kg	Dermal Chronic RfD mg/kg-day	Oral Chronic RfD mg/kg-day
Semivolatiles			
Acenaphthene	6.54E+05	1.86E-02	6.00E-02
Acenaphthylene	NA	NA	NA
Anthracene	3.72E+06	2.28E-01	3.00E-01
Benzo(a)anthracene	NA	NA	NA
Benzo(a)pyrene	NA	NA	NA
Benzo(b)fluoranthene	NA	NA	NA
Benzo(g,h,i)perylene	NA	NA	NA
Benzo(k)fluoranthene	NA	NA	NA
Chrysene	NA	NA	NA
Dibenzo(a,h)anthracene	NA	NA	NA
Fluoranthene	4.36E+05	1.24E-02	4.00E-02
Fluorene	4.73E+05	2.00E-02	4.00E-02
Indeno(1,2,3-cd)pyrene	NA	NA	NA
Naphthalene	2.49E+05	1.60E-02	2.00E-02
Phenanthrene	NA	NA	NA
Pyrene	3.27E+05	9.30E-03	3.00E-02

NA - Not Available

Table 6
Site-Specific Soil Standards for a Trespasser - Carcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$C_{s_c} = \frac{TR \cdot BW \cdot AT_c}{(EF \cdot ED) \cdot ((CSF_d \cdot SA \cdot ABS_{bap} \cdot AH \cdot CF) + (CSF_o \cdot IngR \cdot CF))}$			
C_{s_c} - Site-Specific Soil Standard - carcinogenic effects =	mg/kg	chemical specific	see below
TR - Target risk level =	unitless	1.00E-05	MDEQ, 2002
BW - Body weight =	kg	45	US EPA 1995, Region IV
AT_c - Averaging time - carcinogenic =	days	25550	US EPA 2005, Region III
EF - Exposure frequency =	days/year	12	reasonable maximum
ED - Exposure duration =	years	10	US EPA 1995, Region IV
CSF_d - Dermal cancer slope factor =	1/(mg/kg-day)	chemical specific	see below
SA - Surface area available for exposure =	cm ²	3052	ESI, 2001
ABS_{bap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001
AH - Adherence factor =	mg/cm ²	0.026	ESI, 2001
CF - Conversion factor =	kg/mg	1.00E-06	
CSF_o - Oral cancer slope factor =	1/(mg/kg-day)	chemical specific	see below
IngR - Ingestion rate =	mg/day	100	ESI, 2001
Constituent	Site-Specific Soil Standard - Carc. mg/kg	Dermal Cancer Slope Factor 1/(mg/kg-day)	Oral Cancer Slope Factor 1/(mg/kg-day)
Semivolatiles			
Benzo(a)anthracene	1.05E+03	2.35E+00	7.30E-01
Benzo(a)pyrene	1.22E+02	2.35E+01	7.30E+00
Benzo(b)fluoranthene	1.05E+03	2.35E+00	7.30E-01
Benzo(k)fluoranthene	1.05E+04	2.35E-01	7.30E-02
Chrysene	1.05E+05	2.35E-02	7.30E-03
Dibenzo(a,h)anthracene	1.05E+02	2.35E+01	7.30E+00
Indeno(1,2,3-cd)pyrene	1.05E+03	2.35E+00	7.30E-01

Table 7
Summary of Site-Specific Cleanup Standards
Former Gulf States Creosoting Facility, Hattiesburg, MS

Constituent	Construction Worker		Maintenance Worker		Trespasser		Most Restrictive Cleanup Standard
	Noncarcinogenic Effects	Carcinogenic Effects	Noncarcinogenic Effects	Carcinogenic Effects	Noncarcinogenic Effects	Carcinogenic Effects	
Acenaphthene	5.81E+06	NA	9.34E+05	NA	6.54E+05	NA	6.54E+05
Acenaphthylene	NA	NA	NA	NA	NA	NA	NA
Anthracene	3.46E+07	NA	5.55E+06	NA	3.72E+06	NA	3.72E+06
Benzo(a)anthracene	NA	9.29E+03	NA	5.97E+02	NA	1.05E+03	5.97E+02
Benzo(a)pyrene	NA	1.15E+03	NA	7.36E+01	NA	1.22E+02	7.36E+01
Benzo(b)fluoranthene	NA	9.29E+03	NA	5.97E+02	NA	1.05E+03	5.97E+02
Benzo(g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	NA	9.29E+04	NA	5.97E+03	NA	1.05E+04	5.97E+03
Chrysene	NA	9.29E+05	NA	5.97E+04	NA	1.05E+05	5.97E+04
Dibenzo(a,h)anthracene	NA	9.29E+02	NA	5.97E+01	NA	1.05E+02	5.97E+01
Fluoranthene	3.88E+06	NA	6.23E+05	NA	4.36E+05	NA	4.36E+05
Fluorene	4.32E+06	NA	6.94E+05	NA	4.73E+05	NA	4.73E+05
Indeno(1,2,3-cd)pyrene	NA	9.29E+03	NA	5.97E+02	NA	1.05E+03	5.97E+02
Naphthalene	NA	NA	3.73E+05	NA	2.49E+05	NA	2.49E+05
Phenanthrene	NA	NA	NA	NA	NA	NA	NA
Pyrene	2.91E+06	NA	4.67E+05	NA	3.27E+05	NA	3.27E+05

All values are in mg/kg

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY MEETING ATTENDEES LIST

DATE: February 6, 2006

SITE NAME: Gulf States Creosote

LOCATION: Hattiesburg, MS

PARTICIPANT	COMPANY	PHONE NUMBER
Tony Russell	MDEQ - GARD	601-961-5318
Jerry Banks	MDEQ - GARD	601-961-5221
Bill Cheney	SOS	601-359-6377
Gloria Tatum	MDEQ - EJ	601-961-5011
Mary Joy Casley	MDEQ - Legal	601-961-5369

SUMMARY:

Discussed Access Issues for:

- Woods Property
- American Legion
- Sevon Property



"Dave Upthegrove"
<dupthegrove@ix.netcom.co
m>

02/01/2006 10:21 AM

To "Tony Russell" <tony_russell@deq.state.ms.us>

cc

bcc

Subject Site Access/Remediation Status

Tony:

The status of site access and remedial planning at the Hattiesburg site is as follows:

Harris Property

1. We have one bid for demolition/disposal and are awaiting a second. We have also contracted a Mississippi-licensed asbestos abatement contractor to test building materials to see if any require special handling.
2. We are working on setting up a contract/purchase order with Singley so we're ready to proceed with remediation once we've taken the house down.
3. We need to discuss with MDEQ the results of sampling on the Harris property and cleanup requirements.

Southern Railroad Area

1. Has MDEQ had the opportunity to review the revised risk assessment addendum and forward to/discuss with EPA Region 4? If so, where do they stand on our proposed cleanup levels?
2. We have had preliminary discussions with legal counsel for Norfolk Southern regarding a more "drivable" cap for affected soils in the area. If Tronox and Norfolk Southern can work out the details (e.g., maintenance, indemnification, insurance, deed recordation), would MDEQ be agreeable to a cap similar to the Courtesy Ford cap?
3. We are working on setting up a contract/purchase order with Singley so we're ready to proceed when all parties are in agreement on the remedy. Depending on the remedy, additional contractors (e.g., pavement construction firms) may be necessary.

Other Areas

1. Last week, Keith spoke with T.J Bevon and we are working toward getting agreements in place with Bevon and McCarthy (the Florence 375A sample property). Bevon indicated he'd agree to allow us access to the property between Down Home Cookin' and Woods.

We would like to arrange a conference call with you and Jerry for Thursday afternoon or Friday morning, if possible. Please let me know if you two are available then.

We look forward to completing remediation of the Hattiesburg site in 2006.

Dave

David C. Upthegrove, P.G.
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"Dave Upthegrove"
<dupthegrove@ix.netcom.com>
m>

01/13/2006 05:01 PM

To "Tony Russell" <tony_russell@deq.state.ms.us>

cc "Keith Watson" <keith.watson@tronox.com>

bcc

Subject Soil Data - Harris Property

Tony:

Attached are the following files:

1. Laboratory reports (SDG 971281; DW- and BY- samples).
2. A summary of soil data from the Harris property (Harris Data).
3. A drawing showing sample locations and existing topography (Harris Property Survey).

Keith and I spoke with Mr. Harris today and he anticipates being out of his house and into temporary living quarters around February 1. We have two demolition contractors recommended by Bennie Sellers prepared to give Tronox bids for demolition and disposal of building materials. Bennie also gave me a point of contact for working on the sanitary sewer line beneath Harrell Street.

If all goes well, we hope to complete cleanup and have the site ready for construction sometime this spring. Should you have any questions or comments, please contact me.

Regards,

Dave

David C. Upthegrove, P.G.
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Version: 7.1.371 / Virus Database: 267.14.17/228 - Release Date: 1/12/2006 SDG 971281.pdf Harris Data.xls



Harris Property Survey.pdf

Lancaster Laboratories

Analytical Report

Analysis Name	4670913		4670914		4670915		4670916		4670917		4670918	
	Result	DW-6(5-6') LOQ	Result	DW-7(5-6') LOQ	Result	DW-2(5-6') LOQ	Result	BY-1(5-6') LOQ	Result	BY-8(5-6') LOQ	Result	BY-5(5-6') LOQ
Moisture	16.2	0.50	14.2	0.50	15.6	0.50	15.2	0.50	14.6	0.50	13.4	0.50
Acenaphthene	16,000.	1,700.	N.D.	170.	N.D.	170.	68. J	170.	60,000.	33,000.	N.D.	170.
Pyrene	19,000.	1,700.	62. J	170.	79. J	170.	630.	170.	55,000.	33,000.	190.	170.
Naphthalene	8,300.	1,700.	N.D.	170.	N.D.	170.	N.D.	170.	170,000.	33,000.	N.D.	170.
Acenaphthylene	620.	170.	47. J	170.	N.D.	170.	340.	170.	1,900.	1,700.	45. J	170.
Fluorene	20,000.	1,700.	N.D.	170.	N.D.	170.	130. J	170.	68,000.	33,000.	N.D.	170.
Phenanthrene	59,000.	8,300.	42. J	170.	N.D.	170.	290.	170.	170,000.	33,000.	N.D.	170.
Anthracene	8,800.	1,700.	43. J	170.	N.D.	170.	380.	170.	21,000.	1,700.	N.D.	170.
Fluoranthene	27,000.	1,700.	64. J	170.	57. J	170.	570.	170.	89,000.	33,000.	76. J	170.
Benzo(a)anthracene	5,900.	1,700.	100. J	170.	39. J	170.	540.	170.	15,000.	1,700.	72. J	170.
Chrysene	4,700.	1,700.	120. J	170.	41. J	170.	610.	170.	14,000.	1,700.	54. J	170.
Benzo(b)fluoranthene	3,700.	170.	200.	170.	140. J	170.	1,900.	170.	7,700.	1,700.	390.	170.
Benzo(k)fluoranthene	1,600.	170.	78. J	170.	59. J	170.	720.	170.	2,900.	1,700.	140. J	170.
Benzo(a)pyrene	2,700.	170.	130. J	170.	65. J	170.	1,300.	170.	4,900.	1,700.	270.	170.
Indeno(1,2,3-cd)pyrene	1,100.	170.	66. J	170.	52. J	170.	860.	170.	1,600. J	1,700.	130. J	170.
Dibenz(a,h)anthracene	310.	170.	N.D.	170.	N.D.	170.	230.	170.	500. J	1,700.	35. J	170.
Benzo(g,h,i)perylene	760.	170.	51. J	170.	39. J	170.	600.	170.	1,100. J	1,700.	91. J	170.

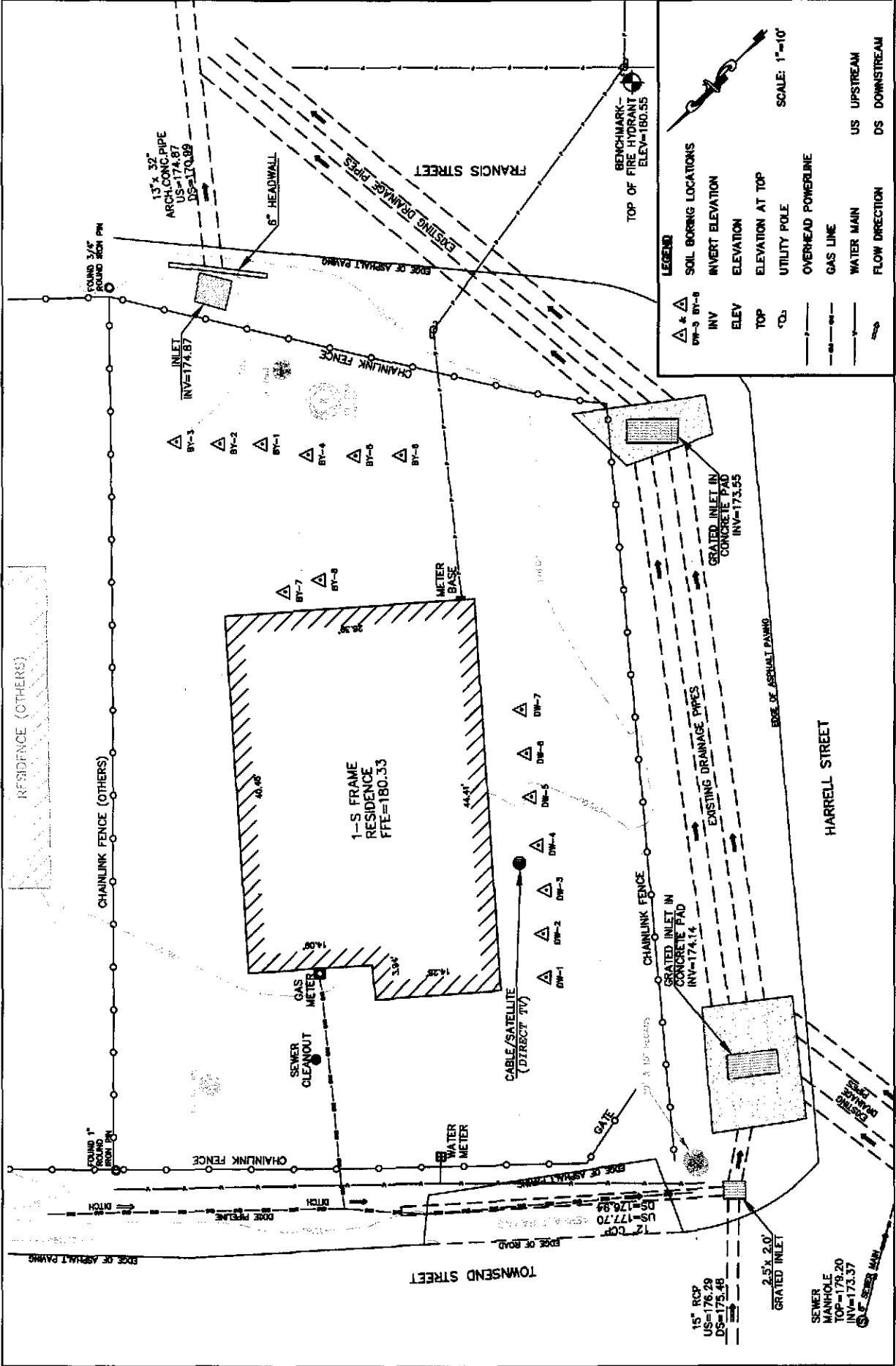
NO.	DATE	REVISION

HARRIS PROPERTY
TRONOX, LLC
FORREST COUNTY, MISSISSIPPI

WATTS ENGINEERING CONSULTANTS, LLC
CIVIL ENGINEERING AND LAND SURVEYING
2009 Brady St., Suite C
Tomball, TX 77405
Phone: (281) 544-4499 Fax: (281) 544-4499

Drawn by: C. WATTS	Scale: 1"=10'
Checked by: C. WATTS	Project No.: 08-001
Date: 12/24/08	Sheet: 1 of 1

TOPGRAPHIC LAYOUT



LEGEND

- △ & △ INV DW-3 BT-9 SOIL BORING LOCATIONS
- △ ELEV ELEV INVERT ELEVATION
- △ TOP ELEVATION AT TOP
- UTILITY POLE
- OVERHEAD POWERLINE
- GAS LINE
- WATER MAIN
- FLOW DIRECTION

US UPSTREAM
DS DOWNSTREAM

SCALE: 1"=10'



"Dave Upthegrove"
<dupthegrove@ix.netcom.com>
01/13/2006 04:41 PM

To "Tony Russel" <tony_russell@deq.state.ms.us>
cc "Keith Watson" <keith.watson@tronox.com>
bcc
Subject Soil Data - Southern Railroad Track Area

Tony:

Attached are the following files:

1. Laboratory reports (the 4 SDG files).
2. A summary of soil data from the Southern Railroad track area (NSRR Data - December 2005). Row 1 tab is line of samples nearest Courtesy Ford; Row 2 tab is middle line of samples; Row 3 tab is line of samples nearest railroad.
3. A drawing showing sample locations and existing topography (NSRR r-o-w).

We plan to submit an addendum to the Remedial Action Work Plan for work in this area after MDEQ has approved or otherwise commented on our proposed risk-based cleanup levels. Should you have any questions or comments, please contact me.

Regards,

Dave

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)
dupthegrove@ix.netcom.com

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No virus found in this outgoing message.
Checked by AVG Free Edition.

Version: 7.1.371 / Virus Database: 267.14.17/228 - Release Date: 1/12/2006  SDG 971281.pdf  SDG 971494.pdf

 SDG 971488.pdf  SDG 971492.pdf  NSRR Data - December 2005.xls  NSRR r-o-w.pdf

Lancaster Laboratories

Analytical Report

Analysis Name	Units	4672430		4672431		4672432		4672433		4672434		4672435		4672436		4672437	
		Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ
Moisture	%	10.2	0.50	11.9	0.50	14.8	0.50	13.9	0.50	13.8	0.50	12.0	0.50	14.2	0.50	12.9	0.50
Acenaphthene	ug/kg	550	830	120	170	N.D.	170	N.D.	170	500	830	3,300	830	N.D.	170	2,600	1,700
Pyrene	ug/kg	44,000	4,200	7,500	330	N.D.	170	N.D.	170	62,000	8,300	120,000	8,300	N.D.	170	72,000	17,000
Naphthalene	ug/kg	1,700	830	830	170	N.D.	170	N.D.	170	1,700	830	8,000	830	N.D.	170	4,300	1,700
Acenaphthylene	ug/kg	5,300	830	910	170	N.D.	170	N.D.	170	5,500	830	6,500	830	N.D.	170	4,300	1,700
Fluorene	ug/kg	1,500	830	260	170	N.D.	170	N.D.	170	1,400	830	13,000	830	N.D.	170	3,500	1,700
Phenanthrene	ug/kg	6,000	830	1,900	170	N.D.	170	N.D.	170	19,000	830	79,000	8,300	N.D.	170	N.D.	1,700
Anthracene	ug/kg	28,000	4,200	4,600	330	N.D.	170	N.D.	170	40,000	8,300	170,000	8,300	N.D.	170	4,700	1,700
Fluoranthene	ug/kg	34,000	4,200	5,800	330	N.D.	170	N.D.	170	54,000	8,300	120,000	8,300	N.D.	170	47,000	17,000
Benzofluoranthene	ug/kg	19,000	830	2,800	170	N.D.	170	N.D.	170	24,000	8,300	43,000	8,300	N.D.	170	20,000	1,700
Chrysene	ug/kg	21,000	4,200	3,600	330	N.D.	170	N.D.	170	25,000	8,300	46,000	8,300	N.D.	170	23,000	1,700
Benzok(1)fluoranthene	ug/kg	38,000	4,200	5,100	330	N.D.	170	N.D.	170	38,000	8,300	49,000	8,300	N.D.	170	27,000	1,700
Benzok(2)fluoranthene	ug/kg	11,000	830	2,000	170	N.D.	170	N.D.	170	13,000	830	14,000	830	N.D.	170	14,000	1,700
Benzofluoranthene	ug/kg	16,000	830	2,300	170	N.D.	170	N.D.	170	18,000	830	28,000	830	N.D.	170	14,000	1,700
Indeno(1,2,3-cd)pyrene	ug/kg	9,700	830	1,500	170	N.D.	170	N.D.	170	12,000	830	13,000	830	N.D.	170	8,200	1,700
Dibenz(a,h)anthracene	ug/kg	3,000	830	470	170	N.D.	170	N.D.	170	3,300	830	3,900	830	N.D.	170	3,000	1,700
Benzofluoranthene	ug/kg	6,600	830	1,000	170	N.D.	170	N.D.	170	8,700	830	9,300	830	N.D.	170	7,800	1,700

Lancaster Laboratories

Analytical Report

Analysis Name

Moelure
Acenaphthene
Pyrene
Naphthalene
Acenaphthylene
Fluorene
Phenanthrene
Anthracene
Fluoranthene
Benzofluoranthene
Chrysene
Benzofluoranthene
Benzofluoranthene
Benzofluoranthene
Indeno(1,2,3-cd)pyrene
Dibenz(a,h)anthracene
Benzofluoranthene

Lancaster Laboratories

Analytical Report

Analysis Name	4672438 GEO-103(G-1)	4672439 GEO-103(1-2)	4672440 GEO-103(2-3)	4672441 GEO-103(5-6)	4672442 GEO-47A(0-1)	4672443 GEO-47A(1-2)	4672444 GEO-47A(5-6)
	Result	Result	Result	Result	Result	Result	Result
	LOQ	LOQ	LOQ	LOQ	LOQ	LOQ	LOQ
Moisture	9.0	18.4	13.7	18.4	13.1	5.6	18.8
Acenaphthene	N.D.	J	520.	J	J	N.D.	25,000.
Pyrene	100.	15,000.	6,100.	N.D.	25,000.	N.D.	19,000.
Naphthalene	N.D.	1,300.	260.	180.	610.	N.D.	70,000.
Acenaphthylene	57.	5,100.	700.	N.D.	5,100.	N.D.	780.
Fluorene	N.D.	J	930.	J	J	N.D.	19,000.
Phenanthrene	98.	2,600.	4,500.	J	1,400.	N.D.	55,000.
Anthracene	59.	7,900.	4,200.	44.	5,400.	N.D.	7,900.
Fluoranthene	110.	13,000.	5,800.	N.D.	14,000.	N.D.	30,000.
Benzof(a)anthracene	62.	11,000.	2,300.	N.D.	16,000.	N.D.	7,400.
Chrysene	64.	16,000.	2,800.	N.D.	14,000.	N.D.	6,000.
Benzof(b)fluoranthene	170.	26,000.	3,800.	N.D.	28,000.	N.D.	5,300.
Benzof(k)fluoranthene	62.	7,400.	1,400.	N.D.	11,000.	N.D.	1,800.
Benzof(a)pyrene	84.	14,000.	2,000.	N.D.	14,000.	N.D.	3,100.
Indeno(1,2,3-cd)pyrene	77.	11,000.	1,400.	N.D.	9,600.	N.D.	1,300.
Dibenz(a,h)anthracene	N.D.	2,900.	400.	N.D.	2,800.	N.D.	340.
Benzof(g,h,i)perylene	63.	8,000.	1,000.	N.D.	6,700.	N.D.	870.

Lancaster Laboratories

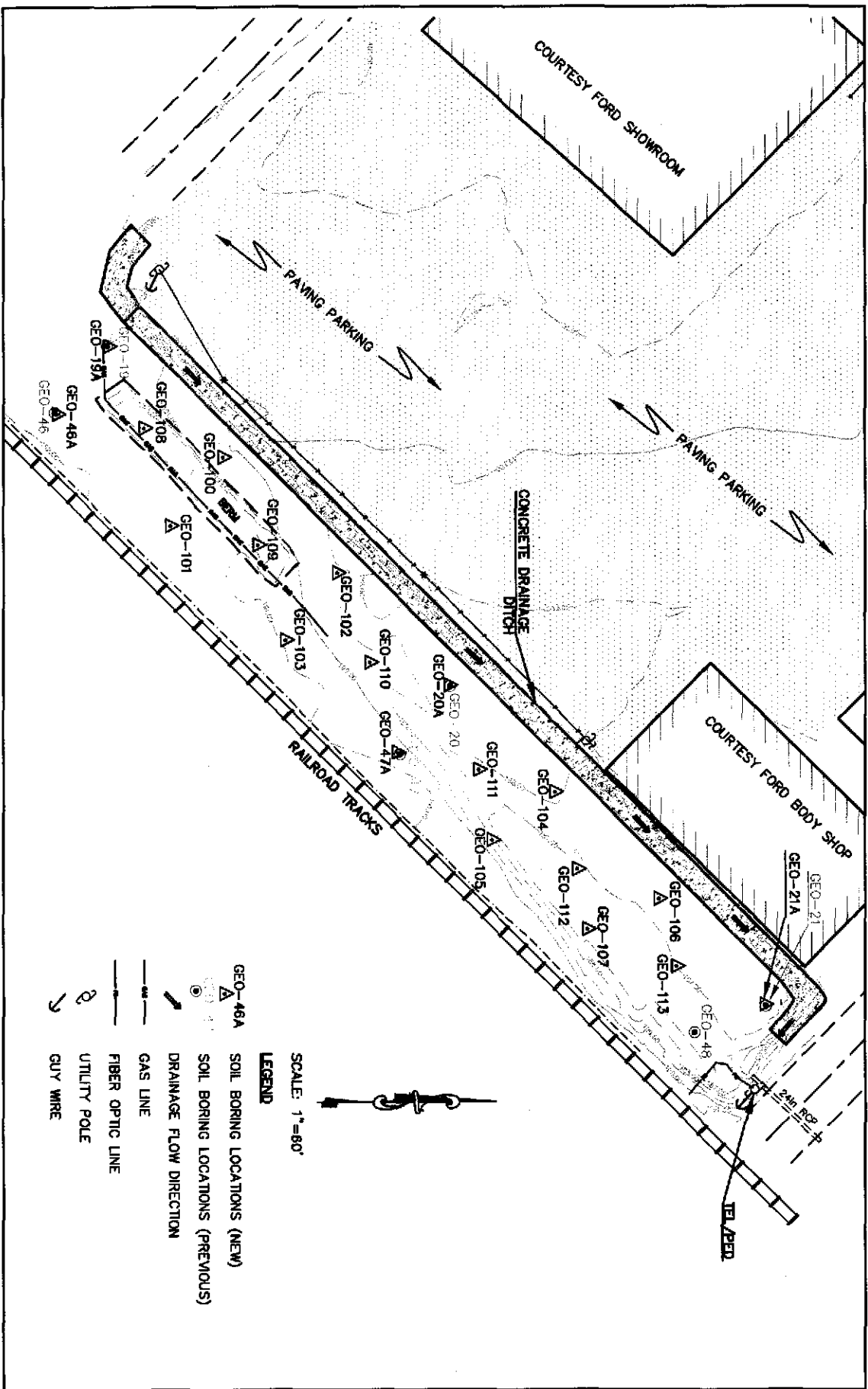
Analytical Report

Analysis Name	4672445		4672446		4672454		4672455		4672456		4672457		4672458		4672459	
	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ
Moisture	20.0	0.50	17.2	0.50	31.9	0.50	17.3	0.50	34.4	43.6	0.50	19.0	0.50	16.3	0.50	
Acenaphthene	680. J	830.	2,100.	830.	58,000. J	5,000.	58,000.	17,000.	11,000.	53,000.	5,000.	5,800.	1,700.	5,400.	1,700.	
Pyrene	30,000.	1,700.	140,000.	17,000.	20,000.	5,000.	53,000.	17,000.	430,000.	640,000.	100,000.	4,800.	1,700.	4,400.	1,700.	
Naphthalene	1,700.	830.	10,000.	830.	25,000.	5,000.	160,000.	17,000.	46,000.	5,000.	48,000.	5,000.	250.	5,700.	1,700.	
Acenaphthylene	7,700.	830.	26,000.	4,200.	10,000.	5,000.	1,300. J	1,700.	50,000.	30,000.	5,000.	190.	170.	280.	170.	
Fluorene	600. J	830.	5,800.	830.	2,800. J	5,000.	59,000.	17,000.	12,000.	90,000.	5,000.	7,300.	1,700.	6,700.	1,700.	
Phenanthrene	4,700.	830.	13,000.	830.	9,500.	5,000.	180,000.	17,000.	77,000.	400,000.	100,000.	23,000.	1,700.	21,000.	1,700.	
Anthracene	7,400.	830.	65,000.	4,200.	10,000.	5,000.	22,000.	1,700.	110,000.	150,000.	100,000.	2,900.	170.	3,500.	170.	
Fluoranthene	25,000.	1,700.	72,000.	4,200.	19,000.	5,000.	94,000.	17,000.	550,000.	1,000,000.	100,000.	9,200.	1,700.	8,500.	1,700.	
Benzofluoranthene	22,000.	1,700.	61,000.	4,200.	13,000.	5,000.	18,000.	1,700.	170,000.	250,000.	100,000.	1,900.	170.	2,000.	170.	
Chrysene	18,000.	1,700.	66,000.	4,200.	20,000.	5,000.	15,000.	1,700.	200,000.	50,000.	210,000.	100,000.	1,400.	1,800.	170.	
Benzokilovalanthrene	34,000.	1,700.	180,000.	17,000.	47,000.	5,000.	11,000.	1,700.	320,000.	50,000.	180,000.	100,000.	1,100.	1,200.	170.	
Benzofluoranthene	13,000.	830.	51,000.	4,200.	15,000.	5,000.	3,900.	1,700.	160,000.	86,000.	5,000.	430.	170.	480.	170.	
Benzofluoranthene	21,000.	1,700.	99,000.	4,200.	25,000.	5,000.	7,000.	1,700.	200,000.	100,000.	47,000.	750.	170.	790.	170.	
Indeno(1,2,3-cd)pyrene	13,000.	830.	67,000.	4,200.	23,000.	5,000.	2,100.	1,700.	110,000.	47,000.	5,000.	300.	170.	280.	170.	
Dibenz(a,h)anthracene	3,700.	830.	12,000.	830.	6,600.	5,000.	880. J	1,700.	35,000.	18,000.	5,000.	110. J	170.	130. J	170.	
Benzofluoranthene	10,000.	830.	52,000.	4,200.	24,000.	5,000.	2,300.	1,700.	100,000.	45,000.	5,000.	280.	170.	290.	170.	

Lancaster Laboratories

Analytical Report

Analysis Name	4672460		4672461		4672462		4672463	
	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ
Moisture	27.3	0.50	47.8	0.50	31.7	0.50	15.2	0.50
Acenaphthene	850,000	50,000	550,000	50,000	79,000	5,000	57	170
Pyrene	2,000,000	250,000	940,000	50,000	180,000	50,000	190	170
Naphthalene	450,000	50,000	650,000	50,000	54,000	5,000	54	170
Acenaphthylene	86,000	5,000	56,000	5,000	11,000	5,000	N.D.	170
Fluorene	1,100,000	50,000	730,000	50,000	110,000	5,000	150	170
Phenanthrene	3,600,000	250,000	2,400,000	250,000	290,000	50,000	640	170
Anthracene	1,200,000	250,000	650,000	50,000	110,000	50,000	120	170
Fluoranthene	3,500,000	250,000	1,800,000	250,000	240,000	50,000	320	170
Benzofluoranthene	790,000	50,000	310,000	50,000	70,000	5,000	51	170
Chrysene	700,000	50,000	310,000	50,000	89,000	5,000	52	170
Benzokylfluoranthene	390,000	50,000	290,000	50,000	75,000	5,000	43	170
Benzofluoranthene	390,000	50,000	290,000	50,000	75,000	5,000	43	170
Benzofluoranthene	390,000	50,000	290,000	50,000	75,000	5,000	43	170
Indeno(1,2,3-cd)pyrene	400,000	50,000	190,000	50,000	48,000	5,000	N.D.	170
Dibenz(a,h)anthracene	200,000	50,000	85,000	5,000	23,000	5,000	N.D.	170
Benzofluoranthene	48,000	5,000	27,000	5,000	7,400	5,000	N.D.	170
Benzofluoranthene	180,000	50,000	79,000	5,000	22,000	5,000	N.D.	170



WAITS ENGINEERING CONSULTANTS, LLC
 Civil Engineering and Land Surveying
 2009 Hardy St., Suite C
 Hattiesburg, MS 39401
 Phone: (601) 544-4009 Fax: (601) 544-4995

Date:	12/28/2005
Scale:	1"=60'
Survey Class:	N/A
Project No.:	03-02B
Drawn by:	C.BROUSSARD

Lancaster Laboratories

Analytical Report

Analysis Name	Units	4672427		4672428		4672429		4672417		4672418		4672419	
		Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ
Moisture	%	11.3	0.50	13.4	0.50	13.5	0.50	11.7	0.50	14.2	0.50	15.7	0.50
Acenaphthene	ug/kg	3,100	830	580,000	170,000	290,000	83,000	N.D.	8,300	100	J	20,000	1,700
Pyrene	ug/kg	97,000	8,300	500,000	170,000	230,000	83,000	22,000	8,300	59	J	15,000	1,700
Naphthalene	ug/kg	2,800	830	2,600,000	170,000	1,500,000	83,000	4,500	8,300	2,100	170	150,000	17,000
Acenaphthylene	ug/kg	13,000	830	96,000	8,300	20,000	8,300	7,900	8,300	N.D.	170	920	1,700
Fluorene	ug/kg	8,700	830	600,000	170,000	300,000	83,000	N.D.	8,300	120	J	20,000	1,700
Phenanthrene	ug/kg	30,000	8,300	1,600,000	170,000	810,000	83,000	5,200	8,300	430	170	53,000	17,000
Anthracene	ug/kg	83,000	8,300	420,000	170,000	140,000	8,300	6,900	8,300	N.D.	170	12,000	1,700
Fluoranthene	ug/kg	96,000	8,300	700,000	170,000	350,000	83,000	21,000	8,300	110	J	23,000	1,700
Benzo(a)anthracene	ug/kg	45,000	8,300	140,000	8,300	73,000	8,300	13,000	8,300	N.D.	170	5,100	1,700
Chrysene	ug/kg	59,000	8,300	140,000	8,300	64,000	8,300	12,000	8,300	N.D.	170	4,800	1,700
Benzo(b)fluoranthene	ug/kg	94,000	8,300	95,000	8,300	48,000	8,300	35,000	8,300	N.D.	170	2,900	1,700
Benzo(k)fluoranthene	ug/kg	33,000	8,300	37,000	8,300	20,000	8,300	11,000	8,300	N.D.	170	1,200	J
Benzo(a)pyrene	ug/kg	51,000	8,300	64,000	8,300	32,000	8,300	20,000	8,300	N.D.	170	2,100	1,700
Indeno(1,2,3-cd)pyrene	ug/kg	34,000	8,300	29,000	8,300	12,000	8,300	16,000	8,300	N.D.	170	780	J
Dibenz(a,h)anthracene	ug/kg	7,400	830	8,500	8,300	3,600	J	4,500	J	N.D.	170	N.D.	1,700
Benzo(g,h,i)perylene	ug/kg	18,000	830	20,000	8,300	8,800	8,300	14,000	8,300	N.D.	170	620	J

Lancaster Laboratories

Analytical Report

Analysis Name	4672415		4672416		4672412		4672413		4672414	
	GEO-110(2-3)	LOQ	GEO-110(3-4)	LOQ	GEO-111(1-2)	LOQ	GEO-111(2-3)	LOQ	GEO-111(4-5)	LOQ
Moisture	28.2	0.50	18.0	0.50	28.1	0.50	20.4	0.50	14.8	0.50
Acenaphthene	160. J	330.	N.D.	170.	18,000.	17,000.	81,000.	17,000.	8,300.	1,700.
Pyrene	7,500.	670.	54. J	170.	450,000.	33,000.	63,000.	17,000.	7,500.	1,700.
Naphthalene	540.	330.	N.D.	170.	97,000.	17,000.	210,000.	17,000.	24,000.	1,700.
Acenaphthylene	950.	330.	N.D.	170.	68,000.	17,000.	2,700.	1,700.	510.	170.
Fluorene	240. J	330.	38. J	170.	55,000.	17,000.	84,000.	17,000.	10,000.	1,700.
Phenanthrene	3,200.	330.	160. J	170.	99,000.	17,000.	190,000.	17,000.	23,000.	1,700.
Anthracene	3,500.	330.	36. J	170.	450,000.	33,000.	59,000.	17,000.	5,700.	1,700.
Fluoranthene	8,000.	330.	83. J	170.	330,000.	17,000.	99,000.	17,000.	12,000.	1,700.
Benzo(a)anthracene	4,300.	330.	N.D.	170.	250,000.	17,000.	18,000.	1,700.	2,000.	170.
Chrysene	5,900.	330.	N.D.	170.	250,000.	17,000.	16,000.	1,700.	1,900.	170.
Benzo(b)fluoranthene	7,200.	330.	N.D.	170.	490,000.	33,000.	12,000.	1,700.	1,200.	170.
Benzo(k)fluoranthene	2,700.	330.	N.D.	170.	170,000.	17,000.	4,600.	1,700.	540.	170.
Benzo(a)pyrene	3,700.	330.	N.D.	170.	310,000.	17,000.	7,700.	1,700.	880.	170.
Indeno(1,2,3-cd)pyrene	2,400.	330.	N.D.	170.	200,000.	17,000.	3,800.	1,700.	340.	170.
Dibenz(a,h)anthracene	740.	330.	N.D.	170.	54,000.	17,000.	1,100. J	1,700.	100. J	170.
Benzo(g,h,i)perylene	1,900.	330.	N.D.	170.	150,000.	17,000.	2,900.	1,700.	230.	170.

Lancaster Laboratories

Analytical Report

Analysis Name	4672410		4672411		4672407		4672408		4672409	
	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ
Moisture	19.9	0.50	22.8	0.50	25.0	0.50	17.9	0.50	15.6	0.50
Acenaphthene	84. J	170.	41. J	170.	3,500,000.	1,700,000.	17,000.	1,700.	67,000.	17,000.
Pyrene	38. J	170.	N.D.	170.	7,700,000.	1,700,000.	12,000.	1,700.	39,000.	1,700.
Naphthalene	230.	170.	200.	170.	4,700,000.	1,700,000.	17,000.	1,700.	230,000.	17,000.
Acenaphthylene	36. J	170.	N.D.	170.	180,000.	83,000.	600.	170.	2,700.	1,700.
Fluorene	110. J	170.	63. J	170.	4,300,000.	1,700,000.	22,000.	1,700.	82,000.	17,000.
Phenanthrene	130. J	170.	100. J	170.	12,000,000.	1,700,000.	66,000.	8,300.	200,000.	17,000.
Anthracene	35. J	170.	N.D.	170.	4,300,000.	1,700,000.	8,200.	1,700.	33,000.	1,700.
Fluoranthene	61. J	170.	N.D.	170.	12,000,000.	1,700,000.	19,000.	1,700.	87,000.	17,000.
Benzo(a)anthracene	N.D.	170.	N.D.	170.	1,900,000.	83,000.	3,400.	170.	14,000.	1,700.
Chrysene	N.D.	170.	N.D.	170.	2,400,000.	1,700,000.	3,000.	170.	13,000.	1,700.
Benzo(b)fluoranthene	N.D.	170.	N.D.	170.	1,300,000.	83,000.	2,200.	170.	8,400.	1,700.
Benzo(k)fluoranthene	N.D.	170.	N.D.	170.	580,000.	83,000.	860.	170.	3,400.	1,700.
Benzo(a)pyrene	N.D.	170.	N.D.	170.	780,000.	83,000.	1,600.	170.	6,200.	1,700.
Indeno(1,2,3-cd)pyrene	N.D.	170.	N.D.	170.	380,000.	83,000.	680.	170.	2,700.	1,700.
Dibenz(a,h)anthracene	N.D.	170.	N.D.	170.	110,000.	83,000.	220.	170.	860. J	1,700.
Benzo(g,h,i)perylene	N.D.	170.	N.D.	170.	280,000.	83,000.	510.	170.	2,200.	1,700.

Lancaster Laboratories
Analytical Report

Analysis Name	Units	4670919		4670920		4670921		4670922		4670923		4670924		4670925		4670926	
		Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ
Mixture	%	9.4	0.50	12.4	0.50	11.0	0.50	22.6	0.50	9.6	0.50	12.4	0.50	20.7	0.50	14.3	0.50
Acenaphthene	ug/kg	660. J	830.	N.D.	170.	42. J	170.	210. J	830.	55,000.	8,300.	140,000.	8,300.	850,000.	330,000.	36,000.	1,700.
Pyrene	ug/kg	38,000.	4,200.	150. J	170.	140. J	170.	12,000.	830.	340,000.	170,000.	230,000.	83,000.	1,200,000.	330,000.	64,000.	17,000.
Naphthalene	ug/kg	1,700.	830.	N.D.	170.	N.D.	170.	2,100.	830.	49,000.	8,300.	400,000.	83,000.	2,700,000.	330,000.	140,000.	17,000.
Acenaphthylene	ug/kg	6,300.	830.	N.D.	170.	N.D.	170.	3,700.	830.	11,000.	8,300.	9,300.	8,300.	63,000.	17,000.	3,700.	1,700.
Fluorene	ug/kg	2,800.	830.	N.D.	170.	83. J	170.	370. J	830.	74,000.	8,300.	180,000.	8,300.	1,100,000.	330,000.	61,000.	17,000.
Phenanthrene	ug/kg	7,400.	830.	130. J	170.	290. J	170.	2,800.	830.	330,000.	170,000.	540,000.	83,000.	2,800,000.	330,000.	150,000.	17,000.
Anthracene	ug/kg	31,000.	4,200.	110. J	170.	590.	170.	4,300.	830.	410,000.	170,000.	310,000.	83,000.	1,900,000.	330,000.	33,000.	1,700.
Fluoranthene	ug/kg	33,000.	4,200.	170.	170.	180.	170.	10,000.	830.	360,000.	170,000.	360,000.	83,000.	1,800,000.	330,000.	92,000.	17,000.
Benzofluoranthene	ug/kg	21,000.	4,200.	67. J	170.	48. J	170.	8,300.	830.	92,000.	8,300.	76,000.	8,300.	370,000.	17,000.	20,000.	1,700.
Chrysene	ug/kg	19,000.	4,200.	57. J	170.	57. J	170.	8,100.	830.	110,000.	8,300.	80,000.	8,300.	390,000.	17,000.	15,000.	1,700.
Benzofluoranthene	ug/kg	45,000.	4,200.	130. J	170.	65. J	170.	17,000.	830.	87,000.	8,300.	17,000.	830.	260,000.	17,000.	13,000.	1,700.
Benzofluoranthene	ug/kg	16,000.	830.	53. J	170.	N.D.	170.	6,600.	830.	36,000.	8,300.	17,000.	830.	100,000.	17,000.	4,800.	1,700.
Benzofluoranthene	ug/kg	24,000.	4,200.	65. J	170.	36. J	170.	9,400.	830.	56,000.	8,300.	36,000.	8,300.	180,000.	17,000.	8,600.	1,700.
Indeno(1,2,3-cd)pyrene	ug/kg	14,000.	830.	41. J	170.	N.D.	170.	6,900.	830.	31,000.	8,300.	15,000.	830.	85,000.	17,000.	3,800.	1,700.
Dibenz(a,h)anthracene	ug/kg	4,300.	830.	N.D.	170.	N.D.	170.	1,900.	830.	9,300.	8,300.	4,300.	830.	25,000.	17,000.	1,200. J	1,700.
Benzofluoranthene	ug/kg	11,000.	830.	35. J	170.	N.D.	170.	5,800.	830.	25,000.	8,300.	11,000.	830.	68,000.	17,000.	2,900.	1,700.

Lancaster Laboratories

Analytical Report

Analysis Name	4670927		4670928		4670929		4670930		4670931		4670932		4672400		4672401	
	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ
Moisture	8.0	0.50	17.4	0.50	14.1	0.50	12.9	0.50	13.7	0.50	14.9	0.50	17.0	0.50	14.6	0.50
Acenaphthene	2,000.	830.	4,400.	830.	11,000.	1,700.	1,500.	170.	1,300.	830.	1,400.	830.	140.	J	330.	220.
Pyrene	89,000.	8,300.	49,000.	4,200.	15,000.	1,700.	2,000.	170.	56,000.	4,200.	38,000.	4,200.	72,000.	6,700.	24,000.	1,700.
Naphthalene	10,000.	830.	35,000.	4,200.	3,300.	170.	1,100.	170.	18,000.	830.	8,800.	830.	N.D.	330.	51.	J
Acenaphthylene	13,000.	830.	8,300.	830.	590.	170.	2,200.	170.	12,000.	830.	9,800.	830.	1,400.	330.	530.	170.
Fluorene	2,900.	830.	3,600.	830.	16,000.	1,700.	5,400.	330.	1,500.	830.	1,500.	310.	J	330.	300.	170.
Phenanthrene	14,000.	830.	19,000.	830.	36,000.	1,700.	5,400.	330.	14,000.	830.	13,000.	830.	420.	330.	430.	170.
Anthracene	17,000.	830.	10,000.	830.	12,000.	1,700.	1,200.	170.	14,000.	830.	13,000.	830.	1,600.	330.	1,100.	170.
Fluoranthene	87,000.	8,300.	50,000.	4,200.	21,000.	1,700.	2,600.	170.	50,000.	4,200.	38,000.	4,200.	60,000.	6,700.	16,000.	1,700.
Benz(a)anthracene	55,000.	8,300.	23,000.	4,200.	5,000.	1,700.	640.	170.	33,000.	4,200.	22,000.	4,200.	13,000.	1,700.	3,600.	170.
Chrysene	60,000.	8,300.	20,000.	4,200.	3,900.	170.	560.	170.	29,000.	4,200.	21,000.	4,200.	21,000.	1,700.	4,700.	1,700.
Benz(b)fluoranthene	120,000.	8,300.	52,000.	4,200.	3,100.	170.	360.	170.	53,000.	4,200.	39,000.	4,200.	18,000.	1,700.	6,400.	1,700.
Benz(k)fluoranthene	45,000.	8,300.	20,000.	4,200.	1,300.	170.	170.	170.	20,000.	4,200.	18,000.	830.	4,600.	330.	2,100.	170.
Benz(a)pyrene	68,000.	8,300.	36,000.	4,200.	2,200.	170.	260.	170.	36,000.	4,200.	26,000.	4,200.	7,400.	330.	2,700.	170.
Indeno(1,2,3-cd)pyrene	47,000.	8,300.	17,000.	830.	800.	170.	90.	J	16,000.	830.	13,000.	830.	3,400.	330.	1,200.	170.
Dibenz(a,h)anthracene	9,000.	830.	4,800.	830.	250.	170.	N.D.	170.	4,400.	830.	3,400.	830.	1,100.	330.	380.	170.
Benz(g,h,i)perylene	36,000.	8,300.	12,000.	830.	580.	170.	58.	J	12,000.	830.	9,900.	830.	2,400.	330.	810.	170.

Lancaster Laboratories

Analytical Report

Analysis Name	4672402 GEO-104(2-3)		4672403 GEO-104(4-5)		4672404 GEO-108(3-4)		4672405 GEO-108(5-6)		4672406 GEO-21A(5-6)	
	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ	Result	LOQ
Moisture	16.1	0.50	17.4	0.50	20.7	0.50	15.4	0.50	14.0	0.50
Acenaphthene	N.D.	170.	8,500.	1,700.	41,000.	3,300.	3,100.	170.	2,000.	170.
Pyrene	150. J	170.	15,000.	1,700.	65,000.	3,300.	3,300.	170.	2,300.	170.
Naphthalene	38. J	170.	8,000.	1,700.	47,000.	3,300.	7,100.	890.	3,100.	170.
Acenaphthylene	34. J	170.	410.	170.	3,500.	3,300.	200.	170.	110. J	170.
Fluorene	N.D.	170.	7,400.	1,700.	47,000.	3,300.	3,900.	170.	2,200.	170.
Fluoranthene	N.D.	170.	20,000.	1,700.	140,000.	33,000.	11,000.	890.	6,100.	390.
Anthracene	N.D.	170.	2,900.	170.	29,000.	3,300.	2,100.	170.	1,100.	170.
Fluoranthene	71. J	170.	23,000.	1,700.	120,000.	33,000.	5,800.	890.	3,100.	170.
Benzo(a)anthracene	110. J	170.	3,800.	170.	27,000.	3,300.	1,100.	170.	800.	170.
Chrysene	110. J	170.	3,300.	170.	28,000.	3,300.	940.	170.	570.	170.
Benzo(b)fluoranthene	290.	170.	1,900.	170.	25,000.	3,300.	640.	170.	530.	170.
Benzo(k)fluoranthene	130. J	170.	840.	170.	9,800.	3,300.	310.	170.	200.	170.
Benzo(e)pyrene	180.	170.	1,100.	170.	16,000.	3,300.	470.	170.	370.	170.
Indeno(1,2,3-cd)pyrene	98. J	170.	420.	170.	7,500.	3,300.	180.	170.	140. J	170.
Dibenz(a,h)anthracene	N.D.	170.	140. J	170.	2,300. J	3,300.	58. J	170.	42. J	170.
Benzo(g,h,i)perylene	70. J	170.	280.	170.	5,700.	3,300.	130. J	170.	100. J	170.



Analysis Report

2425 New Holland Pike, PO Box 12425, Lancaster, PA 17605-2425 • 717-858-2300 Fax: 717-858-2881 • www.lancasterlabs.com

ANALYTICAL RESULTS

Prepared for:

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

734-367-7900

Prepared by:

Lancaster Laboratories
2425 New Holland Pike
Lancaster, PA 17605-2425

SAMPLE GROUP

The sample group for this submittal is 971494. Samples arrived at the laboratory on Friday, December 16, 2005. The PO# for this group is ZAKW1KEOK0A90149.

Client Description

Lancaster Labs Number

GEO-105(2-3') Grab Soil Sample	4672454
GEO-105(5-7') Grab Soil Sample	4672455
GEO-107(0-1') Grab Soil Sample	4672456
GEO-107(1-2') Grab Soil Sample	4672457
GEO-107(2-3') Grab Soil Sample	4672458
GEO-107(5-6') Grab Soil Sample	4672459
GEO-48A(0-1') Grab Soil Sample	4672460
GEO-48A(1-2') Grab Soil Sample	4672461
GEO-48A(2-3') Grab Soil Sample	4672462
GEO-48A(4-5') Grab Soil Sample	4672463

METHODOLOGY

The specific methodologies used in obtaining the enclosed analytical results are indicated on the laboratory chronicles.

1 COPY TO Michael Pisani & Associates
1 COPY TO Kerr-McGee Corporation
1 COPY TO Data Package Group

Attn: David Upthegrove
Attn: Roy Widmann



Analysis Report

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Questions? Contact your Client Services Representative
Gwen A Birchall at (717) 656-2300

Respectfully Submitted,

A handwritten signature in cursive script that reads "Charles J. Neelund".

Charles J. Neelund
Manager



Analysis Report

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Lancaster Laboratories Sample No. SW 4672454

GEO-105(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:50 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:40
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10523 SDG#: HMS59-01

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	31.9	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	3,200.	J 5,000.	ug/kg	10
01195	Pyrene	129-00-0	20,000.	5,000.	ug/kg	10
03761	Naphthalene	91-20-3	25,000.	5,000.	ug/kg	10
03765	Acenaphthylene	208-96-8	10,000.	5,000.	ug/kg	10
03768	Fluorene	86-73-7	2,800.	J 5,000.	ug/kg	10
03775	Phenanthrene	85-01-8	9,500.	5,000.	ug/kg	10
03776	Anthracene	120-12-7	10,000.	5,000.	ug/kg	10
03778	Fluoranthene	206-44-0	19,000.	5,000.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	13,000.	5,000.	ug/kg	10
03782	Chrysene	218-01-9	20,000.	5,000.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	47,000.	5,000.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	15,000.	5,000.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	29,000.	5,000.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	23,000.	5,000.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	6,600.	5,000.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	24,000.	5,000.	ug/kg	10

Due to the nature of the sample matrix, a reduced aliquot was used for analysis. The reporting limits were raised accordingly.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatiles compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 19:08	Timothy J Trees	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1

Lancaster Laboratories Sample No. SW 4672455

 GEO-105(5-7') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:55 by DU Account Number: 07802

 Submitted: 12/16/2005 09:55 Kerr-McGee Corporation
 Reported: 12/29/2005 at 13:40 PO Box 3048
 Discard: 02/28/2006 Livonia MI 48150

10557 SDG#: HMS59-02

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	17.3	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	58,000.	17,000.	ug/kg	100
01195	Pyrene	129-00-0	53,000.	17,000.	ug/kg	100
03761	Naphthalene	91-20-3	160,000.	17,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	1,300.	1,700.	ug/kg	10
03768	Fluorene	86-73-7	59,000.	17,000.	ug/kg	100
03775	Phenanthrene	85-01-8	180,000.	17,000.	ug/kg	100
03776	Anthracene	120-12-7	22,000.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	94,000.	17,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	18,000.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	15,000.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	11,000.	1,700.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	3,900.	1,700.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	7,000.	1,700.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	2,100.	1,700.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	680.	1,700.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	2,300.	1,700.	ug/kg	10
Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.						

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis		Analyst	Dilution Factor
				Date and Time			
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13		Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 19:29		Timothy J Trees	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 19:36		Ryan P Byrne	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00		Maryan G Attalla	1

Lancaster Laboratories Sample No. SW 4672456

 GEO-107(0-1') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:10 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:40
 Discard: 02/28/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

10701 SDG#: HMS59-03

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	34.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	11,000.	5,000.	ug/kg	10
01195	Pyrene	129-00-0	430,000.	50,000.	ug/kg	100
03761	Naphthalene	91-20-3	46,000.	5,000.	ug/kg	10
03765	Acenaphthylene	208-96-8	50,000.	5,000.	ug/kg	10
03768	Fluorene	86-73-7	12,000.	5,000.	ug/kg	10
03775	Phenanthrene	85-01-8	77,000.	5,000.	ug/kg	10
03776	Anthracene	120-12-7	110,000.	5,000.	ug/kg	10
03778	Fluoranthene	206-44-0	550,000.	50,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	170,000.	50,000.	ug/kg	100
03782	Chrysene	218-01-9	200,000.	50,000.	ug/kg	100
03786	Benzo(b)fluoranthene	205-99-2	320,000.	50,000.	ug/kg	100
03787	Benzo(k)fluoranthene	207-08-9	160,000.	50,000.	ug/kg	100
03788	Benzo(a)pyrene	50-32-8	200,000.	50,000.	ug/kg	100
03789	Indeno(1,2,3-cd)pyrene	193-39-5	110,000.	5,000.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	35,000.	5,000.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	100,000.	5,000.	ug/kg	10

Due to the nature of the sample matrix, a reduced aliquot was used for analysis. The reporting limits were raised accordingly.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 19:50	Timothy J Trees	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 19:56	Ryan P Byrne	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1



Analysis Report

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Page 2 of 2

Lancaster Laboratories Sample No. SW 4672456

GEO-107(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:10 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:40
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10701 SDG#: HMS59-03

Lancaster Laboratories Sample No. SW 4672457

 GEO-107(1-2') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:12 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:40
 Discard: 02/28/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

10712 SDG#: HMS59-04

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	43.6	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	53,000.	5,000.	ug/kg	10
01195	Pyrene	129-00-0	640,000.	100,000.	ug/kg	200
03761	Naphthalene	91-20-3	48,000.	5,000.	ug/kg	10
03765	Acenaphthylene	208-96-8	30,000.	5,000.	ug/kg	10
03768	Fluorene	86-73-7	90,000.	5,000.	ug/kg	10
03775	Phenanthrene	85-01-8	400,000.	100,000.	ug/kg	200
03776	Anthracene	120-12-7	150,000.	100,000.	ug/kg	200
03778	Fluoranthene	206-44-0	1,000,000.	100,000.	ug/kg	200
03781	Benzo(a)anthracene	56-55-3	250,000.	100,000.	ug/kg	200
03782	Chrysene	218-01-9	210,000.	100,000.	ug/kg	200
03786	Benzo(b)fluoranthene	205-99-2	180,000.	100,000.	ug/kg	200
03787	Benzo(k)fluoranthene	207-08-9	66,000.	5,000.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	100,000.	5,000.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	47,000.	5,000.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	18,000.	5,000.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	45,000.	5,000.	ug/kg	10

Due to the nature of the sample matrix, a reduced aliquot was used for analysis. The reporting limits were raised accordingly.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 20:11	Timothy J Trees	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 20:16	Ryan P Byrne	200
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672457

GEO-107(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:12 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:40
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10712 SDG#: HMS59-04

Lancaster Laboratories Sample No. SW 4672458

 GEO-107(2-3') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:15 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:40
 Discard: 02/28/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

10723 SDG#: HMS59-05

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	19.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	5,800.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	4,800.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	250.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	190.	170.	ug/kg	1
03768	Fluorene	86-73-7	7,300.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	23,000.	1,700.	ug/kg	10
03776	Anthracene	120-12-7	2,900.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	9,200.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	1,900.	170.	ug/kg	1
03782	Chrysene	218-01-9	1,400.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	1,100.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	430.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	750.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	300.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	110.	J 170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	280.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 20:32	Timothy J Trees	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 20:35	Ryan P Byrne	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1

Lancaster Laboratories Sample No. SW 4672459

 GEO-107(5-6') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:25 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:40
 Discard: 02/28/2006

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10756 SDG#: HMS59-06

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	16.3	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	5,400.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	4,400.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	5,700.	1,700.	ug/kg	10
03765	Acenaphthylene	208-96-8	260.	170.	ug/kg	1
03768	Fluorene	86-73-7	6,700.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	21,000.	1,700.	ug/kg	10
03776	Anthracene	120-12-7	3,500.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	8,500.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	2,000.	170.	ug/kg	1
03782	Chrysene	218-01-9	1,800.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	1,200.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	460.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	790.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	280.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	130.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	290.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 20:52	Timothy J Trees	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 20:55	Ryan P Byrne	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1

Lancaster Laboratories Sample No. SW 4672460

 GEO-48A(0-1') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:35 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:40
 Discard: 02/28/2006

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48A01 SDG#: HMS59-07

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	27.3	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	850,000.	50,000.	ug/kg	100
01195	Pyrene	129-00-0	2,000,000.	250,000.	ug/kg	500
03761	Naphthalene	91-20-3	450,000.	50,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	86,000.	5,000.	ug/kg	10
03768	Fluorene	86-73-7	1,100,000.	50,000.	ug/kg	100
03775	Phenanthrene	85-01-8	3,600,000.	250,000.	ug/kg	500
03776	Anthracene	120-12-7	1,200,000.	250,000.	ug/kg	500
03778	Fluoranthene	206-44-0	3,500,000.	250,000.	ug/kg	500
03781	Benzo(a)anthracene	56-55-3	760,000.	50,000.	ug/kg	100
03782	Chrysene	218-01-9	700,000.	50,000.	ug/kg	100
03786	Benzo(b)fluoranthene	205-99-2	760,000.	50,000.	ug/kg	100
03787	Benzo(k)fluoranthene	207-08-9	300,000.	50,000.	ug/kg	100
03788	Benzo(a)pyrene	50-32-8	400,000.	50,000.	ug/kg	100
03789	Indeno(1,2,3-cd)pyrene	193-39-5	200,000.	50,000.	ug/kg	100
03790	Dibenz(a,h)anthracene	53-70-3	48,000.	5,000.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	180,000.	50,000.	ug/kg	100

Due to the nature of the sample matrix, a reduced aliquot was used for analysis. The reporting limits were raised accordingly.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 21:13	Timothy J Trees	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 21:14	Ryan P Byrne	100
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 21:35	Ryan P Byrne	500
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1



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Lancaster Laboratories Sample No. SW 4672460

GEO-48A(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:35 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:40
Discard: 02/28/2006

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48A01 SDG#: HMS59-07

Lancaster Laboratories Sample No. SW 4672461

 GEO-48A(1-2') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:37 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:40
 Discard: 02/28/2006

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48A12 SDG#: HMS59-08

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	47.8	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	550,000.	50,000.	ug/kg	100
01195	Pyrene	129-00-0	940,000.	50,000.	ug/kg	100
03761	Naphthalene	91-20-3	650,000.	50,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	56,000.	5,000.	ug/kg	10
03768	Fluorene	86-73-7	730,000.	50,000.	ug/kg	100
03775	Phenanthrene	85-01-8	2,400,000.	250,000.	ug/kg	500
03776	Anthracene	120-12-7	650,000.	50,000.	ug/kg	100
03778	Fluoranthene	206-44-0	1,600,000.	250,000.	ug/kg	500
03781	Benzo(a)anthracene	56-55-3	310,000.	50,000.	ug/kg	100
03782	Chrysene	218-01-9	310,000.	50,000.	ug/kg	100
03786	Benzo(b)fluoranthene	205-99-2	290,000.	50,000.	ug/kg	100
03787	Benzo(k)fluoranthene	207-08-9	110,000.	5,000.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	190,000.	50,000.	ug/kg	100
03789	Indeno(1,2,3-cd)pyrene	193-39-5	85,000.	5,000.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	27,000.	5,000.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	79,000.	5,000.	ug/kg	10

Due to the nature of the sample matrix, a reduced aliquot was used for analysis. The reporting limits were raised accordingly.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatiles compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 21:34	Timothy J Trees	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 21:54	Ryan P Byrne	100
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 22:14	Ryan P Byrne	500
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672461

GEO-48A(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:37 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:40
Discard: 02/28/2006

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Livonia MI 48150

48A12 SDG#: HMS59-08

Lancaster Laboratories Sample No. SW 4672462

 GEO-48A(2-3') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:40 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:40
 Discard: 02/28/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

48A23 SDG#: HMS59-09

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	31.7	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	79,000.	5,000.	ug/kg	10
01195	Pyrene	129-00-0	180,000.	50,000.	ug/kg	100
03761	Naphthalene	91-20-3	54,000.	5,000.	ug/kg	10
03765	Acenaphthylene	208-96-8	11,000.	5,000.	ug/kg	10
03768	Fluorene	86-73-7	110,000.	5,000.	ug/kg	10
03775	Phenanthrene	85-01-8	290,000.	50,000.	ug/kg	100
03776	Anthracene	120-12-7	110,000.	50,000.	ug/kg	100
03778	Fluoranthene	206-44-0	240,000.	50,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	70,000.	5,000.	ug/kg	10
03782	Chrysene	218-01-9	69,000.	5,000.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	75,000.	5,000.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	25,000.	5,000.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	48,000.	5,000.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	23,000.	5,000.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	7,400.	5,000.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	22,000.	5,000.	ug/kg	10

Due to the nature of the sample matrix, a reduced aliquot was used for analysis. The reporting limits were raised accordingly.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 21:55	Timothy J Trees	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 04:57	Linda M Hartenstine	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672462

GEO-48A(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:40 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55

Reported: 12/29/2005 at 13:40

Discard: 02/28/2006

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48A23 SDG#: HMS59-09



Analysis Report

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Lancaster Laboratories Sample No. SW 4672463

GEO-48A(4-5') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 12:55 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:40
Discard: 02/28/2006

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48A45 SDG#: HMS59-10

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	15.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	57. J	170.	ug/kg	1
01195	Pyrene	129-00-0	190.	170.	ug/kg	1
03761	Naphthalene	91-20-3	54. J	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	150. J	170.	ug/kg	1
03775	Phenanthrene	85-01-8	640.	170.	ug/kg	1
03776	Anthracene	120-12-7	120. J	170.	ug/kg	1
03778	Fluoranthene	206-44-0	320.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	51. J	170.	ug/kg	1
03782	Chrysene	218-01-9	52. J	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	43. J	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 16:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/26/2005 11:50	Ryan P Byrne	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryann G Attalla	1

Quality Control Summary

 Client Name: Kerr-McGee Corporation
 Reported: 12/29/05 at 01:40 PM

Group Number: 971494

Matrix QC may not be reported if site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD was performed, unless otherwise specified in the method.

Laboratory Compliance Quality Control

<u>Analysis Name</u>	<u>Blank Result</u>	<u>Blank LOQ</u>	<u>Report Units</u>	<u>LCS %REC</u>	<u>LCSD %REC</u>	<u>LCS/LCSD Limits</u>	<u>RPD</u>	<u>RPD Max</u>
Batch number: 05354820001B	Sample number(s): 4672454-4672463							
Moisture				100		99-101		
Batch number: 05356SLC026	Sample number(s): 4672454-4672463							
Acenaphthene	N.D.	170.	ug/kg	90		74-110		
Pyrene	N.D.	170.	ug/kg	87		67-116		
Naphthalene	N.D.	170.	ug/kg	91		70-103		
Acenaphthylene	N.D.	170.	ug/kg	94		66-113		
Fluorene	N.D.	170.	ug/kg	95		66-115		
Phenanthrene	N.D.	170.	ug/kg	96		70-107		
Anthracene	N.D.	170.	ug/kg	92		69-109		
Fluoranthene	N.D.	170.	ug/kg	94		66-109		
Benzo(a)anthracene	N.D.	170.	ug/kg	93		73-111		
Chrysene	N.D.	170.	ug/kg	90		72-110		
Benzo(b)fluoranthene	N.D.	170.	ug/kg	95		68-117		
Benzo(k)fluoranthene	N.D.	170.	ug/kg	94		69-118		
Benzo(a)pyrene	N.D.	170.	ug/kg	95		72-117		
Indeno(1,2,3-cd)pyrene	N.D.	170.	ug/kg	99		66-123		
Dibenz(a,h)anthracene	N.D.	170.	ug/kg	103		70-130		
Benzo(g,h,i)perylene	N.D.	170.	ug/kg	95		66-120		

Sample Matrix Quality Control

<u>Analysis Name</u>	<u>MS %REC</u>	<u>MSD %REC</u>	<u>MS/MSD Limits</u>	<u>RPD</u>	<u>RPD MAX</u>	<u>BKG Conc</u>	<u>DUP Conc</u>	<u>DUP RPD</u>	<u>Dup RPD Max</u>
Batch number: 05354820001B	Sample number(s): 4672454-4672463								
Moisture				11.2		10.3	9	15	
Batch number: 05356SLC026	Sample number(s): 4672454-4672463								
Acenaphthene	94	89	47-137	5	30				
Pyrene	88	86	25-159	2	30				
Naphthalene	88	88	54-121	1	30				
Acenaphthylene	98	91	66-137	8	30				
Fluorene	99	93	48-130	6	30				
Phenanthrene	86	83	28-155	4	30				
Anthracene	91	90	47-135	1	30				
Fluoranthene	87	84	32-137	3	30				
Benzo(a)anthracene	97	94	39-144	4	30				
Chrysene	92	89	38-144	3	30				
Benzo(b)fluoranthene	97	95	24-155	2	30				
Benzo(k)fluoranthene	94	92	2-176	2	30				

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Quality Control Summary

 Client Name: Kerr-McGee Corporation
 Reported: 12/29/05 at 01:40 PM

Group Number: 971494

Sample Matrix Quality Control

<u>Analysis Name</u>	<u>MS</u> <u>%RRC</u>	<u>MSD</u> <u>%RRC</u>	<u>MS/MSD</u> <u>Limits</u>	<u>RPD</u> <u>MAX</u>	<u>RPD</u> <u>MAX</u>	<u>BKG</u> <u>Conc</u>	<u>DUP</u> <u>Conc</u>	<u>DUP</u> <u>RPD</u>	<u>Dup RPD</u> <u>Max</u>
Benzo(a)pyrene	98	95	38-142	3	30				
Indeno(1,2,3-cd)pyrene	103	97	1-186	6	30				
Dibenz(a,h)anthracene	108	104	44-154	4	30				
Benzo(g,h,i)perylene	98	94	32-150	4	30				

Surrogate Quality Control

 Analysis Name: PAHs in Soil by GC/MS
 Batch number: 05356SLC026

	Nitrobenzene-d5	2-Fluorobiphenyl	Terphenyl-d14
4672454	77	81	91
4672455	75	81	89
4672456	83	89	90
4672457	85	93	103
4672458	72	77	96
4672459	76	82	93
4672460	57	63	92
4672461	85	77	98
4672462	75	90	100
4672463	68	75	89
Blank	83	88	88
LCS	86	86	88
MS	84	92	92
MSD	86	87	90
Limits:	47-128	55-123	51-158

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Analysis Request / Environmental Services Chain of Custody



For Lancaster Laboratories use only

COC # 0107970

Acc. # 07802 Group # 971994 Sample # 5 of 5

4672454-63

Please print. Instructions on reverse side correspond with circled numbers.

<p>1 Client: _____</p> <p>Project Name #: _____ PWSID #: _____</p> <p>Project Manager: _____ P.O.#: _____</p> <p>Sampler: _____ Quote #: _____</p> <p>Name of state where samples were collected: _____</p>		<p>4 Acc. #: _____</p> <p>6 For Lab Use Only FSC: _____ SCR #: _____</p>																																																																																																			
<p>2</p> <p style="text-align: right;">REMARKS</p> <p style="text-align: center;">PHAS L 1270</p>																																																																																																					
<p>3</p> <p>Turnaround Time Requested (TAT) (please circle): <u>Normal</u> Rush</p> <p>(Rush TAT is subject to Lancaster Laboratories approval and surcharge.)</p> <p>Date results are needed: _____</p> <p>Rush results requested by (please circle): Phone Fax E-mail</p> <p>Phone #: _____ Fax #: _____</p> <p>E-mail address: _____</p>	<p>7</p> <table border="1"> <thead> <tr> <th>Sample ID</th> <th>Time</th> <th>Date</th> <th>Relinquished by:</th> <th>Time</th> <th>Date</th> <th>Relinquished by:</th> <th>Time</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>GEO-105/2-3'</td> <td>1150</td> <td>12-15-04</td> <td>X</td> <td>1150</td> <td>12-15-04</td> <td>X</td> <td>1150</td> <td>12-15-04</td> </tr> <tr> <td>GEO-105/5-7'</td> <td>1155</td> <td></td> <td></td> <td>1155</td> <td></td> <td></td> <td>1155</td> <td></td> </tr> <tr> <td>GEO-107/0-1'</td> <td>1210</td> <td></td> <td></td> <td>1210</td> <td></td> <td></td> <td>1210</td> <td></td> </tr> <tr> <td>GEO-107/1-2'</td> <td>1212</td> <td></td> <td></td> <td>1212</td> <td></td> <td></td> <td>1212</td> <td></td> </tr> <tr> <td>GEO-107/2-3'</td> <td>1215</td> <td></td> <td></td> <td>1215</td> <td></td> <td></td> <td>1215</td> <td></td> </tr> <tr> <td>GEO-107/5-8'</td> <td>1221</td> <td></td> <td></td> <td>1221</td> <td></td> <td></td> <td>1221</td> <td></td> </tr> <tr> <td>GEO-48A/0-1'</td> <td>1235</td> <td></td> <td></td> <td>1235</td> <td></td> <td></td> <td>1235</td> <td></td> </tr> <tr> <td>GEO-48A/1-2'</td> <td>1237</td> <td></td> <td></td> <td>1237</td> <td></td> <td></td> <td>1237</td> <td></td> </tr> <tr> <td>GEO-48A/2-3'</td> <td>1240</td> <td></td> <td></td> <td>1240</td> <td></td> <td></td> <td>1240</td> <td></td> </tr> <tr> <td>GEO-48A/4-5'</td> <td>1255</td> <td></td> <td></td> <td>1255</td> <td></td> <td></td> <td>1255</td> <td></td> </tr> </tbody> </table>	Sample ID	Time	Date	Relinquished by:	Time	Date	Relinquished by:	Time	Date	GEO-105/2-3'	1150	12-15-04	X	1150	12-15-04	X	1150	12-15-04	GEO-105/5-7'	1155			1155			1155		GEO-107/0-1'	1210			1210			1210		GEO-107/1-2'	1212			1212			1212		GEO-107/2-3'	1215			1215			1215		GEO-107/5-8'	1221			1221			1221		GEO-48A/0-1'	1235			1235			1235		GEO-48A/1-2'	1237			1237			1237		GEO-48A/2-3'	1240			1240			1240		GEO-48A/4-5'	1255			1255			1255		<p>8</p> <p>Data Package Options (please circle if required)</p> <p>QC Summary Type VI (Raw Data) SDG Complete? Yes No</p> <p>Type I (Tier I) <u>RM</u> GLP Site-specific QC required? Yes No</p> <p>Type II (Tier II) Other (If yes, indicate QC sample and submit duplicate volume.)</p> <p>Type III (NJ Red. Del.) Internal Chain of Custody required? Yes No</p> <p>Type IV (CLP)</p>
Sample ID	Time	Date	Relinquished by:	Time	Date	Relinquished by:	Time	Date																																																																																													
GEO-105/2-3'	1150	12-15-04	X	1150	12-15-04	X	1150	12-15-04																																																																																													
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GEO-48A/4-5'	1255			1255			1255																																																																																														

Explanation of Symbols and Abbreviations

The following defines common symbols and abbreviations used in reporting technical data:

N.D.	none detected	BMQL	Below Minimum Quantitation Level
TNTC	Too Numerous To Count	MPN	Most Probable Number
IU	International Units	CP Units	cobalt-chloroplatinate units
umhos/cm	micromhos/cm	NTU	nephelometric turbidity units
C	degrees Celsius	F	degrees Fahrenheit
meq	milliequivalents	lb.	pound(s)
g	gram(s)	kg	kilogram(s)
ug	microgram(s)	mg	milligram(s)
ml	milliliter(s)	l	liter(s)
m3	cubic meter(s)	ul	microliter(s)
<	less than - The number following the sign is the <u>limit of quantitation</u> , the smallest amount of analyte which can be reliably determined using this specific test.		
>	greater than		
J	estimated value – The result is \geq the Method Detection Limit (MDL) and $<$ the Limit of Quantitation (LOQ).		
ppm	parts per million - One ppm is equivalent to one milligram per kilogram (mg/kg), or one gram per million grams. For aqueous liquids, ppm is usually taken to be equivalent to milligrams per liter (mg/l), because one liter of water has a weight very close to a kilogram. For gases or vapors, one ppm is equivalent to one microliter of gas per liter of gas.		
ppb	parts per billion		
Dry weight basis	Results printed under this heading have been adjusted for moisture content. This increases the analyte weight concentration to approximate the value present in a similar sample without moisture. All other results are reported on an as-received basis.		

U.S. EPA CLP Data Qualifiers:

Organic Qualifiers		Inorganic Qualifiers	
A	TIC is a possible aldol-condensation product	B	Value is $<$ CRDL, but \geq IDL
B	Analyte was also detected in the blank	E	Estimated due to interference
C	Pesticide result confirmed by GC/MS	M	Duplicate injection precision not met
D	Compound quantitated on a diluted sample	N	Spike sample not within control limits
E	Concentration exceeds the calibration range of the instrument	S	Method of standard additions (MSA) used for calculation
N	Presumptive evidence of a compound (TICs only)	U	Compound was not detected
P	Concentration difference between primary and confirmation columns $>25\%$	W	Post digestion spike out of control limits
U	Compound was not detected	*	Duplicate analysis not within control limits
X,Y,Z	Defined in case narrative	+	Correlation coefficient for MSA <0.995

Analytical test results for methods listed on the laboratories' accreditation scope meet all requirements of NELAC unless otherwise noted under the individual analysis.

Measurement uncertainty values, as applicable, are available upon request.

Tests results relate only to the sample tested. Clients should be aware that a critical step in a chemical or microbiological analysis is the collection of the sample. Unless the sample analyzed is truly representative of the bulk of material involved, the test results will be meaningless. If you have questions regarding the proper techniques of collecting samples, please contact us. We cannot be held responsible for sample integrity, however, unless sampling has been performed by a member of our staff. This report shall not be reproduced except in full, without the written approval of the laboratory.

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ANALYTICAL RESULTS

Prepared for:

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

734-367-7900

Prepared by:

Lancaster Laboratories
2425 New Holland Pike
Lancaster, PA 17605-2425**SAMPLE GROUP**

The sample group for this submittal is 971281. Samples arrived at the laboratory on Thursday, December 15, 2005. The PO# for this group is ZAKW1KEOK0A90149.

Client Description**Lancaster Labs Number**

DW-6(5-6') Grab Soil Sample	4670913
DW-7(5-6') Grab Soil Sample	4670914
DW-2(5-6') Grab Soil Sample	4670915
BY-1(5-6') Grab Soil Sample	4670916
BY-8(5-6') Grab Soil Sample	4670917
BY-5(5-6') Grab Soil Sample	4670918
GEO-19A(0-1') Grab Soil Sample	4670919
GEO-19A(1-2') Grab Soil Sample	4670920
GEO-19A(2-3') Grab Soil Sample	4670921
GEO-100(0-1') Grab Soil Sample	4670922
GEO-100(1-2') Grab Soil Sample	4670923
GEO-100(2-3') Grab Soil Sample	4670924
GEO-100(4-5') Grab Soil Sample	4670925
GEO-100(5-6') Grab Soil Sample	4670926
GEO-102(1-2') Grab Soil Sample	4670927
GEO-102(2-3') Grab Soil Sample	4670928
GEO-102(4-5') Grab Soil Sample	4670929
GEO-102(5-6') Grab Soil Sample	4670930
GEO-20A(1.5-2') Grab Soil Sample	4670931
GEO-20A(2-3') Grab Soil Sample	4670932

METHODOLOGY



Analysis Report

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The specific methodologies used in obtaining the enclosed analytical results are indicated on the laboratory chronicles.

1 COPY TO Michael Pisani & Associates
1 COPY TO Kerr-McGee Corporation
1 COPY TO Data Package Group

Attn: David Upthegrove
Attn: Roy Widmann

Questions? Contact your Client Services Representative
Gwen A Birchall at (717) 656-2300

Respectfully Submitted,

A handwritten signature in black ink that reads "Rachel R. Cochis".

Rachel R. Cochis
Group Leader

Lancaster Laboratories Sample No. SW 4670913

 DW-6(5-6') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/13/2005 11:30 by DU

Account Number: 07802

 Submitted: 12/15/2005 09:55
 Reported: 01/03/2006 at 10:33
 Discard: 03/05/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

DW-6- SDG#: HMS56-01

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	16.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	16,000.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	19,000.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	8,300.	1,700.	ug/kg	10
03765	Acenaphthylene	208-96-8	620.	170.	ug/kg	1
03768	Fluorene	86-73-7	20,000.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	59,000.	8,300.	ug/kg	50
03776	Anthracene	120-12-7	8,800.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	27,000.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	5,900.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	4,700.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	3,700.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	1,600.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	2,700.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	1,100.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	310.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	760.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 01:23	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 09:40	Joseph M Gambler	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 10:36	Joseph M Gambler	50
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670914

DW-7(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/13/2005 11:45 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:33
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

DW-7- SDG#: HMS56-02

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	62. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	47. J	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	42. J	170.	ug/kg	1
03776	Anthracene	120-12-7	43. J	170.	ug/kg	1
03778	Fluoranthene	206-44-0	64. J	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	100. J	170.	ug/kg	1
03782	Chrysene	218-01-9	120. J	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	200.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	78. J	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	130. J	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	66. J	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	51. J	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 02:21	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1

Lancaster Laboratories Sample No. SW 4670915

 DW-2(5-6') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/13/2005 13:45 by DU

Account Number: 07802

 Submitted: 12/15/2005 09:55
 Reported: 01/03/2006 at 10:34
 Discard: 03/05/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

DW-2- SDG#: HMS56-03

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	15.6	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	79. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	N.D.	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	57. J	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	39. J	170.	ug/kg	1
03782	Chrysene	218-01-9	41. J	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	140. J	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	59. J	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	65. J	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	52. J	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	39. J	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 03:18	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Page 1 of 1

Lancaster Laboratories Sample No. SW 4670916

BY-1(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/13/2005 14:30 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

BY-1- SDG#: HMS56-04

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	15.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	68. J	170.	ug/kg	1
01195	Pyrene	129-00-0	630.	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	340.	170.	ug/kg	1
03768	Fluorene	86-73-7	130. J	170.	ug/kg	1
03775	Phenanthrene	85-01-8	290.	170.	ug/kg	1
03776	Anthracene	120-12-7	380.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	570.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	540.	170.	ug/kg	1
03782	Chrysene	218-01-9	610.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	1,900.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	720.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	1,300.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	860.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	230.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	600.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 04:16	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670917

BY-8(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/13/2005 16:20 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

BY-8- SDG#: HMS56-05

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.6	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	60,000.	33,000.	ug/kg	200
01195	Pyrene	129-00-0	55,000.	33,000.	ug/kg	200
03761	Naphthalene	91-20-3	170,000.	33,000.	ug/kg	200
03765	Acenaphthylene	208-96-8	1,900.	1,700.	ug/kg	10
03768	Fluorene	86-73-7	68,000.	33,000.	ug/kg	200
03775	Phenanthrene	85-01-8	170,000.	33,000.	ug/kg	200
03776	Anthracene	120-12-7	21,000.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	89,000.	33,000.	ug/kg	200
03781	Benzo(a)anthracene	56-55-3	15,000.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	14,000.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	7,700.	1,700.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	2,900.	1,700.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	4,900.	1,700.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	1,600. J	1,700.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	500. J	1,700.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	1,100. J	1,700.	ug/kg	10
Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.						

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 11:32	Joseph M Gambler	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 12:29	Joseph M Gambler	200
07806	BNA Soil Extraction	SW-846 3550E	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670918

BY-5(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/13/2005 15:45 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

BY-5- SDG#: HMS56-06

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	13.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	190.	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	45. J	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	N.D.	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	76. J	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	72. J	170.	ug/kg	1
03782	Chrysene	218-01-9	54. J	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	390.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	140. J	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	270.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	130. J	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	35. J	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	91. J	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 13:25	Joseph M Gambler	1
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1

Lancaster Laboratories Sample No. SW 4670919

 GEO-19A(0-1') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 10:30 by DU

Account Number: 07802

 Submitted: 12/15/2005 09:55
 Reported: 01/03/2006 at 10:34
 Discard: 03/05/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

19A01 SDG#: HMS56-07

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	9.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	660.	830.	ug/kg	1
01195	Pyrene	129-00-0	38,000.	4,200.	ug/kg	5
03761	Naphthalene	91-20-3	1,700.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	6,300.	830.	ug/kg	1
03768	Fluorene	86-73-7	2,800.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	7,400.	830.	ug/kg	1
03776	Anthracene	120-12-7	31,000.	4,200.	ug/kg	5
03778	Fluoranthene	206-44-0	33,000.	4,200.	ug/kg	5
03781	Benzo(a)anthracene	56-55-3	21,000.	4,200.	ug/kg	5
03782	Chrysene	218-01-9	19,000.	4,200.	ug/kg	5
03786	Benzo(b)fluoranthene	205-99-2	45,000.	4,200.	ug/kg	5
03787	Benzo(k)fluoranthene	207-08-9	16,000.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	24,000.	4,200.	ug/kg	5
03789	Indeno(1,2,3-cd)pyrene	193-39-5	14,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	4,300.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	11,000.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/20/2005 22:30	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 08:44	Joseph M Gambler	5
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670920

GEO-19A(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 10:35 by DU

Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

19A12 SDG#: HMS56-08

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	12.4	0.50	%	1
	"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.					
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	150. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	130. J	170.	ug/kg	1
03776	Anthracene	120-12-7	110. J	170.	ug/kg	1
03778	Fluoranthene	206-44-0	170.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	67. J	170.	ug/kg	1
03782	Chrysene	218-01-9	57. J	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	130. J	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	53. J	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	65. J	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	41. J	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	35. J	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 14:21	Joseph M Gambler	1
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670921

GEO-19A(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 10:40 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

19A23 SDG#: HMS56-09

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	11.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	42. J	170.	ug/kg	1
01195	Pyrene	129-00-0	140. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	83. J	170.	ug/kg	1
03775	Phenanthrene	85-01-8	290.	170.	ug/kg	1
03776	Anthracene	120-12-7	590.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	180.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	48. J	170.	ug/kg	1
03782	Chrysene	218-01-9	57. J	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	65. J	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	36. J	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 15:17	Joseph M Gambler	1
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670922

GEO-100(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 11:00 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10001 SDG#: HMS56-10

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	22.6	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	210.	830.	ug/kg	1
01195	Pyrene	129-00-0	12,000.	830.	ug/kg	1
03761	Naphthalene	91-20-3	2,100.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	3,700.	830.	ug/kg	1
03768	Fluorene	86-73-7	370.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	2,800.	830.	ug/kg	1
03776	Anthracene	120-12-7	4,300.	830.	ug/kg	1
03778	Fluoranthene	206-44-0	10,000.	830.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	8,300.	830.	ug/kg	1
03782	Chrysene	218-01-9	8,100.	830.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	17,000.	830.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	6,600.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	9,400.	830.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	6,900.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	1,900.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	5,800.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 16:13	Joseph M Gambler	1
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670923

GEO-100(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 11:05 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10012 SDG#: HMS56-11

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	9.6	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	55,000.	8,300.	ug/kg	10
01195	Pyrene	129-00-0	340,000.	170,000.	ug/kg	200
03761	Naphthalene	91-20-3	49,000.	8,300.	ug/kg	10
03765	Acenaphthylene	208-96-8	11,000.	8,300.	ug/kg	10
03768	Fluorene	86-73-7	74,000.	8,300.	ug/kg	10
03775	Phenanthrene	85-01-8	330,000.	170,000.	ug/kg	200
03776	Anthracene	120-12-7	410,000.	170,000.	ug/kg	200
03778	Fluoranthene	206-44-0	360,000.	170,000.	ug/kg	200
03781	Benzo(a)anthracene	56-55-3	92,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	110,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	87,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	36,000.	8,300.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	56,000.	8,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	31,000.	8,300.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	9,300.	8,300.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	25,000.	8,300.	ug/kg	10

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 21:04	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 22:01	William T Parker	200
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670923

GEO-100(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 11:05 by DU

Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10012 SDG#: HMS56-11



Analysis Report

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Lancaster Laboratories Sample No. SW 4670924

GEO-100(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 11:10 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10023 SDG#: HMS56-12

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	12.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	140,000.	8,300.	ug/kg	10
01195	Pyrene	129-00-0	230,000.	83,000.	ug/kg	100
03761	Naphthalene	91-20-3	400,000.	83,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	9,300.	830.	ug/kg	1
03768	Fluorene	86-73-7	180,000.	8,300.	ug/kg	10
03775	Phenanthrene	85-01-8	540,000.	83,000.	ug/kg	100
03776	Anthracene	120-12-7	310,000.	83,000.	ug/kg	100
03778	Fluoranthene	206-44-0	360,000.	83,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	76,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	80,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	51,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	17,000.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	35,000.	8,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	15,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	4,300.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	11,000.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/21/2005 22:57	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 09:56	Joseph M Gambler	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 10:52	Joseph M Gambler	100
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670925

GEO-100(4-5') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 11:15 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10045 SDG#: HMS56-13

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	20.7	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	850,000.	330,000.	ug/kg	200
01195	Pyrene	129-00-0	1,200,000.	330,000.	ug/kg	200
03761	Naphthalene	91-20-3	2,700,000.	330,000.	ug/kg	200
03765	Acenaphthylene	208-96-8	63,000.	17,000.	ug/kg	10
03768	Fluorene	86-73-7	1,100,000.	330,000.	ug/kg	200
03775	Phenanthrene	85-01-8	2,800,000.	330,000.	ug/kg	200
03776	Anthracene	120-12-7	1,900,000.	330,000.	ug/kg	200
03778	Fluoranthene	206-44-0	1,800,000.	330,000.	ug/kg	200
03781	Benzo(a)anthracene	56-55-3	370,000.	17,000.	ug/kg	10
03782	Chrysene	218-01-9	390,000.	17,000.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	260,000.	17,000.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	100,000.	17,000.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	180,000.	17,000.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	85,000.	17,000.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	25,000.	17,000.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	68,000.	17,000.	ug/kg	10

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 11:48	Joseph M Gambler	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 22:58	William T Parker	200
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670925

GEO-100(4-5') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 11:15 by DU

Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10045 SDG#: HMS56-13



Analysis Report

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Lancaster Laboratories Sample No. SW 4670926

GEO-100(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 11:20 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10056 SDG#: HMS56-14

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.3	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	36,000.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	64,000.	17,000.	ug/kg	100
03761	Naphthalene	91-20-3	140,000.	17,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	3,700.	1,700.	ug/kg	10
03768	Fluorene	86-73-7	61,000.	17,000.	ug/kg	100
03775	Phenanthrene	85-01-8	150,000.	17,000.	ug/kg	100
03776	Anthracene	120-12-7	33,000.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	92,000.	17,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	20,000.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	15,000.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	13,000.	1,700.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	4,800.	1,700.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	8,600.	1,700.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	3,800.	1,700.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	1,200.	1,700.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	2,800.	1,700.	ug/kg	10

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatiles compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 12:44	Joseph M Gambler	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 23:54	William T Parker	100
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670927

GEO-102(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 13:25 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10212 SDG#: HMS56-15

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	6.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	2,000.	830.	ug/kg	1
01195	Pyrene	129-00-0	89,000.	8,300.	ug/kg	10
03761	Naphthalene	91-20-3	10,000.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	13,000.	830.	ug/kg	1
03768	Fluorene	86-73-7	2,900.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	14,000.	830.	ug/kg	1
03776	Anthracene	120-12-7	17,000.	830.	ug/kg	1
03778	Fluoranthene	206-44-0	87,000.	8,300.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	55,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	60,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	120,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	45,000.	8,300.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	68,000.	8,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	47,000.	8,300.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	9,000.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	38,000.	8,300.	ug/kg	10

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 01:46	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 13:41	Joseph M Gambler	10
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670928

GEO-102(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 13:30 by DU

Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10223 SDG#: HMS56-16

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	17.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	4,400.	830.	ug/kg	1
01195	Pyrene	129-00-0	49,000.	4,200.	ug/kg	5
03761	Naphthalene	91-20-3	35,000.	4,200.	ug/kg	5
03765	Acenaphthylene	208-96-8	8,300.	830.	ug/kg	1
03768	Fluorene	86-73-7	3,600.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	19,000.	830.	ug/kg	1
03776	Anthracene	120-12-7	10,000.	830.	ug/kg	1
03778	Fluoranthene	206-44-0	50,000.	4,200.	ug/kg	5
03781	Benzo(a)anthracene	56-55-3	23,000.	4,200.	ug/kg	5
03782	Chrysene	218-01-9	20,000.	4,200.	ug/kg	5
03786	Benzo(b)fluoranthene	205-99-2	52,000.	4,200.	ug/kg	5
03787	Benzo(k)fluoranthene	207-08-9	20,000.	4,200.	ug/kg	5
03788	Benzo(a)pyrene	50-32-8	36,000.	4,200.	ug/kg	5
03789	Indeno(1,2,3-cd)pyrene	193-39-5	17,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	4,800.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	12,000.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 02:42	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 15:33	Joseph M Gambler	5
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670929

GEO-102(4-5') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 13:38 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10245 SDG#: HMS56-17

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.1	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	11,000.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	15,000.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	3,300.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	590.	170.	ug/kg	1
03768	Fluorene	86-73-7	16,000.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	36,000.	1,700.	ug/kg	10
03776	Anthracene	120-12-7	12,000.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	21,000.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	5,000.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	3,900.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	3,100.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	1,300.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	2,200.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	800.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	250.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	560.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 03:39	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 16:29	Joseph M Gambler	10
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670930

GEO-102(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 13:40 by DU Account Number: 07802

Submitted: 12/15/2005 09:55 Kerr-McGee Corporation
Reported: 01/03/2006 at 10:34 PO Box 3048
Discard: 03/05/2006 Livonia MI 48150

10256 SDG#: HMS56-18

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	12.9	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	1,500.	170.	ug/kg	1
01195	Pyrene	129-00-0	2,000.	170.	ug/kg	1
03761	Naphthalene	91-20-3	1,100.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	110. J	170.	ug/kg	1
03768	Fluorene	86-73-7	2,200.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	5,400.	330.	ug/kg	2
03776	Anthracene	120-12-7	1,200.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	2,600.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	640.	170.	ug/kg	1
03782	Chrysene	218-01-9	560.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	360.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	170.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	260.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	90. J	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	58. J	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 04:35	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 00:51	William T Parker	2
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4670931

GEO-20A(1.5-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 13:55 by DU Account Number: 07802

Submitted: 12/15/2005 09:55
Reported: 01/03/2006 at 10:34
Discard: 03/05/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

20A12 SDG#: HMS56-19

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	13.7	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	1,300.	830.	ug/kg	1
01195	Pyrene	129-00-0	56,000.	4,200.	ug/kg	5
03761	Naphthalene	91-20-3	18,000.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	12,000.	830.	ug/kg	1
03768	Fluorene	86-73-7	1,500.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	14,000.	830.	ug/kg	1
03776	Anthracene	120-12-7	14,000.	830.	ug/kg	1
03778	Fluoranthene	206-44-0	50,000.	4,200.	ug/kg	5
03781	Benzo(a)anthracene	56-55-3	33,000.	4,200.	ug/kg	5
03782	Chrysene	218-01-9	29,000.	4,200.	ug/kg	5
03786	Benzo(b)fluoranthene	205-99-2	53,000.	4,200.	ug/kg	5
03787	Benzo(k)fluoranthene	207-08-9	20,000.	4,200.	ug/kg	5
03788	Benzo(a)pyrene	50-32-8	36,000.	4,200.	ug/kg	5
03789	Indeno(1,2,3-cd)pyrene	193-39-5	16,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	4,400.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	12,000.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 05:32	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 01:47	William T Parker	5
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1

Lancaster Laboratories Sample No. SW 4670932

 GEO-20A(2-3') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 13:58 by DU

Account Number: 07802

 Submitted: 12/15/2005 09:55
 Reported: 01/03/2006 at 10:34
 Discard: 03/05/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

20A23 SDG#: HMS56-20*

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.9	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	1,400.	830.	ug/kg	1
01195	Pyrene	129-00-0	38,000.	4,200.	ug/kg	5
03761	Naphthalene	91-20-3	8,800.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	9,800.	830.	ug/kg	1
03768	Fluorene	86-73-7	1,500.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	13,000.	830.	ug/kg	1
03776	Anthracene	120-12-7	13,000.	830.	ug/kg	1
03778	Fluoranthene	206-44-0	38,000.	4,200.	ug/kg	5
03781	Benzo(a)anthracene	56-55-3	22,000.	4,200.	ug/kg	5
03782	Chrysene	218-01-9	21,000.	4,200.	ug/kg	5
03786	Benzo(b)fluoranthene	205-99-2	39,000.	4,200.	ug/kg	5
03787	Benzo(k)fluoranthene	207-08-9	18,000.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	26,000.	4,200.	ug/kg	5
03789	Indeno(1,2,3-cd)pyrene	193-39-5	13,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	3,400.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	9,900.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 15:46	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 06:28	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 02:44	William T Parker	5
07806	BNA Soil Extraction	SW-846 3550B	2	12/20/2005 13:50	Melida Reyes	1

Quality Control Summary

 Client Name: Kerr-McGee Corporation
 Reported: 01/03/06 at 10:34 AM

Group Number: 971281

Matrix QC may not be reported if site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD was performed, unless otherwise specified in the method.

Laboratory Compliance Quality Control

<u>Analysis Name</u>	<u>Blank Result</u>	<u>Blank LOQ</u>	<u>Report Units</u>	<u>LCS %REC</u>	<u>LCSD %REC</u>	<u>LCS/LCSD Limits</u>	<u>RPD</u>	<u>RPD Max</u>
Batch number: 05353820003A	Sample number(s): 4670913-4670922							
Moisture				100		99-101		
Batch number: 05353820003B	Sample number(s): 4670923-4670932							
Moisture				100		99-101		
Batch number: 05354SLB026	Sample number(s): 4670913-4670932							
Acenaphthene	N.D.	170.	ug/kg	87		74-110		
Pyrene	N.D.	170.	ug/kg	95		67-116		
Naphthalene	N.D.	170.	ug/kg	81		70-103		
Acenaphthylene	N.D.	170.	ug/kg	94		66-113		
Fluorene	N.D.	170.	ug/kg	95		66-115		
Phenanthrene	N.D.	170.	ug/kg	88		70-107		
Anthracene	N.D.	170.	ug/kg	86		69-109		
Fluoranthene	N.D.	170.	ug/kg	87		66-109		
Benzo(a)anthracene	N.D.	170.	ug/kg	94		73-111		
Chrysene	N.D.	170.	ug/kg	92		72-110		
Benzo(b)fluoranthene	N.D.	170.	ug/kg	93		68-117		
Benzo(k)fluoranthene	N.D.	170.	ug/kg	94		69-118		
Benzo(a)pyrene	N.D.	170.	ug/kg	97		72-117		
Indeno(1,2,3-cd)pyrene	N.D.	170.	ug/kg	94		66-123		
Dibenz(a,h)anthracene	N.D.	170.	ug/kg	102		70-130		
Benzo(g,h,i)perylene	N.D.	170.	ug/kg	97		66-120		

Sample Matrix Quality Control

<u>Analysis Name</u>	<u>MS %REC</u>	<u>MSD %REC</u>	<u>MS/MSD Limits</u>	<u>RPD</u>	<u>RPD MAX</u>	<u>BKG Conc</u>	<u>DUP Conc</u>	<u>DUP RPD</u>	<u>Dup RPD Max</u>
Batch number: 05353820003A	Sample number(s): 4670913-4670922								
Moisture						14.6	14.2	3	15
Batch number: 05353820003B	Sample number(s): 4670923-4670932								
Moisture						14.3	14.6	2	15
Batch number: 05354SLB026	Sample number(s): 4670913-4670932								
Acenaphthene	115	105	47-137	8	30				
Pyrene	(2)	(2)	25-159	6	30				
Naphthalene	98	86	54-121	8	30				
Acenaphthylene	106	134	66-137	9	30				
Fluorene	115	78	48-130	21	30				
Phenanthrene	149	57	28-155	28	30				

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Quality Control Summary

 Client Name: Kerr-McGee Corporation
 Reported: 01/03/06 at 10:34 AM

Group Number: 971281

Sample Matrix Quality Control

<u>Analysis Name</u>	<u>MS</u> <u>%REC</u>	<u>MSD</u> <u>%REC</u>	<u>MS/MSD</u> <u>Limits</u>	<u>RPD</u> <u>MAX</u>	<u>BKG</u> <u>Conc</u>	<u>DUP</u> <u>Conc</u>	<u>DUP</u> <u>RPD</u>	<u>Dup RPD</u> <u>Max</u>
Anthracene	(2)	(2)	47-135	46*	30			
Fluoranthene	(2)	(2)	32-137	12	30			
Benzo(a)anthracene	(2)	(2)	39-144	5	30			
Chrysene	(2)	(2)	38-144	2	30			
Benzo(b)fluoranthene	(2)	(2)	24-155	14	30			
Benzo(k)fluoranthene	(2)	(2)	2-176	6	30			
Benzo(a)pyrene	(2)	(2)	38-142	9	30			
Indeno(1,2,3-cd)pyrene	(2)	(2)	1-186	5	30			
Dibenz(a,h)anthracene	79	82	44-154	1	30			
Benzo(g,h,i)perylene	20*	38	32-150	5	30			

Surrogate Quality Control

 Analysis Name: PAHs in Soil by GC/MS
 Batch number: 05354SLB026

	<u>Nitrobenzene-d5</u>	<u>2-Fluorobiphenyl</u>	<u>Terphenyl-d14</u>
4670913	67	75	95
4670914	54	57	84
4670915	65	69	86
4670916	63	70	87
4670917	75	94	109
4670918	60	65	80
4670919	98	108	117
4670920	65	69	79
4670921	65	74	83
4670922	72	97	114
4670923	92	111	124
4670924	99	106	100
4670925	125	102	156
4670926	73	84	98
4670927	91	106	106
4670928	93	105	130
4670929	60	70	98
4670930	63	72	97
4670931	89	104	93
4670932	87	102	98
Blank	83	85	92
LCS	84	83	95
MS	97	109	116
MSD	92	100	113
Limits:	47-128	55-123	51-158

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Analysis Request / Environmental Services Chain of Custody



For Lancaster Laboratories use only

Acc. # 07802 Group # 9712 & 1 Sample # 4070913-32

COC # 0107965

Please print. Instructions on reverse side correspond with circled numbers.

1 Client: <u>MICHAEL PESAVE & ASSOC.</u> Acc. #: _____ Project Name: <u>HATT LESBUNDK</u> PWSID #: _____ Project Manager: <u>UP THE GRAVE</u> P.O.#: _____ Sampler: <u>UP THE GRAVE</u> Quote #: _____ Name of state where samples were collected: <u>W.S.</u>		2		3		4		5		6 For Lab Use Only FSC: _____ SCR #: _____			
<u>DW-6/5-61</u> <u>DW-7/5-61</u> <u>DW-2/5-61</u> <u>BY-1/5-61</u> <u>BY-2/5-61</u> <u>BY-5/5-61</u> <u>GEO-PA/0-1</u> <u>GEO-MA/1-21</u> <u>GEO-MA/2-31</u> <u>GEO-100/0-13</u>		<u>12-13-05</u> <u>12-14-05</u> 		<u>X</u> 		<u>X</u> 		 		 		 	
7 Turnaround Time Requested (TAT) (please circle): <u>Normal</u> Rush (Rush TAT is subject to Lancaster Laboratories approval and surcharge.) Date results are needed: _____ Rush results requested by (please circle): _____ Phone _____ Fax _____ E-mail _____ Phone #: _____ Fax #: _____ E-mail address: _____		8 Data Package Options (please circle if required) SDG Complete? Yes No QC Summary <u>Tier I</u> Type VI (Raw Data) Yes No Type I (Tier I) <u>SM</u> . GLP Site-specific QC required? Yes No Type II (Tier II) Other (If yes, indicate QC sample and submit triplicate volume) Type III (NJ Red. Del.) Internal Chain of Custody required? Yes No Type IV (CLP)											

Analysis Request / Environmental Services Chain of Custody



For Lancaster Laboratories use only

COC # 0107964

Acc. # 07802 Group # 971281 Sample # 4610913-32

Please print. Instructions on reverse side correspond with circled numbers.

1 Client: <u>MICHAEL PERANE & ASSOC</u> Acc. #: _____ Project Name#: _____ PWSID #: _____ Project Manager: _____ P.O.#: _____ Sampler: _____ Quote #: _____ Name of state where samples were collected: _____		5 For Lab Use Only FSC: _____ SCR #: <u>22833</u>	
2 Turnaround Time Requested (TAT) (please circle): <u>Normal</u> <input type="checkbox"/> <u>Rush</u> <input type="checkbox"/> (Rush TAT is subject to Lancaster Laboratories approval and surcharge.) Date results are needed: _____ Rush results requested by (please circle): Phone Fax E-mail Phone #: _____ Fax #: _____ E-mail address: _____		6 Remarks:	
3 Data Package Options (please circle if required) QC Summary <u>Tier I</u> Type VI (Raw Data) Yes No Type I (Tier I) <u>Standard</u> P Other Type II (Tier II) _____ Type III (NJ Red. Del.) _____ Type IV (CLP) _____		4 Relinquished by: _____ Date: _____ Time: _____ Relinquished by: _____ Date: _____ Time: _____ Relinquished by: _____ Date: _____ Time: _____ Relinquished by: _____ Date: _____ Time: _____ Relinquished by: _____ Date: _____ Time: _____	
7 Site-specific QC required? Yes No Internal Chain of Custody required? Yes No		8 Relinquished by: _____ Date: _____ Time: _____ Relinquished by: _____ Date: _____ Time: _____ Relinquished by: _____ Date: _____ Time: _____ Relinquished by: _____ Date: _____ Time: _____	
GE0-100/1-2' 1105 GE0-100/2-3' 1110 GE0-100/4-5' 1115 GE0-100/5-6' 1120 GE0-102/1-2' 1325 GE0-102/2-3' 1330 GE0-102/4-5' 1335 GE0-102/5-6' 1340 GE0-20A/1.5-2' 1355 GE0-20A/2-3' 1358		PAITS by 0270	

Explanation of Symbols and Abbreviations

The following defines common symbols and abbreviations used in reporting technical data:

N.D.	none detected	BMQL	Below Minimum Quantitation Level
TNTC	Too Numerous To Count	MPN	Most Probable Number
IU	International Units	CP Units	cobalt-chloroplatinate units
umhos/cm	micromhos/cm	NTU	nephelometric turbidity units
C	degrees Celsius	F	degrees Fahrenheit
meq	milliequivalents	lb.	pound(s)
g	gram(s)	kg	kilogram(s)
ug	microgram(s)	mg	milligram(s)
ml	milliliter(s)	l	liter(s)
m3	cubic meter(s)	ul	microliter(s)
<	less than - The number following the sign is the <u>limit of quantitation</u> , the smallest amount of analyte which can be reliably determined using this specific test.		
>	greater than		
J	estimated value – The result is \geq the Method Detection Limit (MDL) and $<$ the Limit of Quantitation (LOQ).		
ppm	parts per million - One ppm is equivalent to one milligram per kilogram (mg/kg), or one gram per million grams. For aqueous liquids, ppm is usually taken to be equivalent to milligrams per liter (mg/l), because one liter of water has a weight very close to a kilogram. For gases or vapors, one ppm is equivalent to one microliter of gas per liter of gas.		
ppb	parts per billion		
Dry weight basis	Results printed under this heading have been adjusted for moisture content. This increases the analyte weight concentration to approximate the value present in a similar sample without moisture. All other results are reported on an as-received basis.		

U.S. EPA CLP Data Qualifiers:

Organic Qualifiers		Inorganic Qualifiers	
A	TIC is a possible aldol-condensation product	B	Value is $<$ CRDL, but \geq IDL
B	Analyte was also detected in the blank	E	Estimated due to interference
C	Pesticide result confirmed by GC/MS	M	Duplicate injection precision not met
D	Compound quantitated on a diluted sample	N	Spike sample not within control limits
E	Concentration exceeds the calibration range of the instrument	S	Method of standard additions (MSA) used for calculation
N	Presumptive evidence of a compound (TICs only)	U	Compound was not detected
P	Concentration difference between primary and confirmation columns $>$ 25%	W	Post digestion spike out of control limits
U	Compound was not detected	*	Duplicate analysis not within control limits
X,Y,Z	Defined in case narrative	+	Correlation coefficient for MSA $<$ 0.995

Analytical test results for methods listed on the laboratories' accreditation scope meet all requirements of NELAC unless otherwise noted under the individual analysis.

Measurement uncertainty values, as applicable, are available upon request.

Tests results relate only to the sample tested. Clients should be aware that a critical step in a chemical or microbiological analysis is the collection of the sample. Unless the sample analyzed is truly representative of the bulk of material involved, the test results will be meaningless. If you have questions regarding the proper techniques of collecting samples, please contact us. We cannot be held responsible for sample integrity, however, unless sampling has been performed by a member of our staff. This report shall not be reproduced except in full, without the written approval of the laboratory.

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Analysis Report

2425 New Holland Pike, PO Box 12425, Lancaster, PA 17606-2425 • 717-658-2300 Fax: 717-658-2681 • www.lancasterlabs.com

ANALYTICAL RESULTS

Prepared for:

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

734-367-7900

Prepared by:

Lancaster Laboratories
2425 New Holland Pike
Lancaster, PA 17605-2425

SAMPLE GROUP

The sample group for this submittal is 971488. Samples arrived at the laboratory on Friday, December 16, 2005. The PO# for this group is ZAKW1KEOK0A90149.

Client Description

Lancaster Labs Number

GEO-19A(3-4') Grab Soil Sample	4672400
GEO-19A(5-6') Grab Soil Sample	4672401
GEO-104(2-3') Grab Soil Sample	4672402
GEO-104(4-5') Grab Soil Sample	4672403
GEO-106(3-4') Grab Soil Sample	4672404
GEO-106(5-6') Grab Soil Sample	4672405
GEO-21A(5-6') Grab Soil Sample	4672406
GEO-113(1-2') Grab Soil Sample	4672407
GEO-113(3-4') Grab Soil Sample	4672408
GEO-113(5-6') Grab Soil Sample	4672409
GEO-112(1-2') Grab Soil Sample	4672410
GEO-112(2-3') Grab Soil Sample	4672411
GEO-111(1-2') Grab Soil Sample	4672412
GEO-111(2-3') Grab Soil Sample	4672413
GEO-111(4-5') Grab Soil Sample	4672414
GEO-110(2-3') Grab Soil Sample	4672415
GEO-110(3-4') Grab Soil Sample	4672416
GEO-109(0-1') Grab Soil Sample	4672417
GEO-109(1-2') Grab Soil Sample	4672418
GEO-109(2-3') Grab Soil Sample	4672419

METHODOLOGY



Analysis Report

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The specific methodologies used in obtaining the enclosed analytical results are indicated on the laboratory chronicles.

1 COPY TO Michael Pisani & Associates
1 COPY TO Kerr-McGee Corporation
1 COPY TO Data Package Group

Attn: David Upthegrove
Attn: Roy Widmann

Questions? Contact your Client Services Representative
Gwen A Birchall at (717) 656-2300

Respectfully Submitted,

A handwritten signature in cursive script that reads "Charles J. Neslund".

Charles J. Neslund
Manager



Analysis Report

2425 New Holland Pike, PO Box 12425, Lancaster, PA 17605-2425 • 717-656-2300 Fax: 717-656-2681 • www.lancasterlabs.com

Lancaster Laboratories Sample No. SW 4672400

GEO-19A(3-4') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 14:05 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:19
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

19A34 SDG#: HMS57-01

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	17.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	140. J	330.	ug/kg	1
01195	Pyrene	129-00-0	72,000.	6,700.	ug/kg	20
03761	Naphthalene	91-20-3	N.D.	330.	ug/kg	1
03765	Acenaphthylene	208-96-8	1,400.	330.	ug/kg	1
03768	Fluorene	86-73-7	310. J	330.	ug/kg	1
03775	Phenanthrene	85-01-8	420.	330.	ug/kg	1
03776	Anthracene	120-12-7	1,600.	330.	ug/kg	1
03778	Fluoranthene	206-44-0	60,000.	6,700.	ug/kg	20
03781	Benzo(a)anthracene	56-55-3	13,000.	1,700.	ug/kg	5
03782	Chrysene	218-01-9	21,000.	1,700.	ug/kg	5
03786	Benzo(b)fluoranthene	205-99-2	16,000.	1,700.	ug/kg	5
03787	Benzo(k)fluoranthene	207-08-9	4,600.	330.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	7,400.	330.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	3,400.	330.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	1,100.	330.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	2,400.	330.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 10:10	Joseph M Gambler	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 19:52	William T Parker	5
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 20:47	William T Parker	20
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Page 1 of 1

Lancaster Laboratories Sample No. SW 4672401

GEO-19A(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 14:10 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

19A56 SDG#: HMS57-02

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.6	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	220.	170.	ug/kg	1
01195	Pyrene	129-00-0	24,000.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	51. J	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	530.	170.	ug/kg	1
03768	Fluorene	86-73-7	300.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	430.	170.	ug/kg	1
03776	Anthracene	120-12-7	1,100.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	16,000.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	3,600.	170.	ug/kg	1
03782	Chrysene	218-01-9	4,700.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	6,400.	1,700.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	2,100.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	2,700.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	1,200.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	380.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	810.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 11:05	Joseph M Gambler	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 21:42	William T Parker	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

2425 New Holland Pike, PO Box 12425, Lancaster, PA 17605-2425 • 717-656-2300 Fax: 717-656-2681 • www.lancasterlabs.com

Lancaster Laboratories Sample No. SW 4672402

GEO-104(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 14:20 by DU Account Number: 07802

Submitted: 12/16/2005 09:55 Kerr-McGee Corporation
Reported: 12/29/2005 at 13:20 PO Box 3048
Discard: 02/28/2006 Livonia MI 48150

10423 SDG#: HMS57-03

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	16.1	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	150. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	38. J	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	34. J	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	N.D.	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	71. J	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	110. J	170.	ug/kg	1
03782	Chrysene	218-01-9	110. J	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	290.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	130. J	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	180.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	98. J	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	70. J	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 12:01	Joseph M Gambler	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1

Lancaster Laboratories Sample No. SW 4672403

 GEO-104(4-5') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 14:25 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:20
 Discard: 02/28/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

10445 SDG#: HMS57-04

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	17.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	8,500.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	15,000.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	8,000.	1,700.	ug/kg	10
03765	Acenaphthylene	208-96-8	410.	170.	ug/kg	1
03768	Fluorene	86-73-7	7,400.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	20,000.	1,700.	ug/kg	10
03776	Anthracene	120-12-7	2,900.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	23,000.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	3,800.	170.	ug/kg	1
03782	Chrysene	218-01-9	3,300.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	1,900.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	840.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	1,100.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	420.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	140.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	280.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 12:55	Joseph M Gambler	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 22:38	William T Parker	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672404

GEO-106(3-4') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 14:45 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10634 SDG#: HMS57-05

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	20.7	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	41,000.	3,300.	ug/kg	10
01195	Pyrene	129-00-0	65,000.	3,300.	ug/kg	10
03761	Naphthalene	91-20-3	47,000.	3,300.	ug/kg	10
03765	Acenaphthylene	208-96-8	3,500.	3,300.	ug/kg	10
03768	Fluorene	86-73-7	47,000.	3,300.	ug/kg	10
03775	Phenanthrene	85-01-8	140,000.	33,000.	ug/kg	100
03776	Anthracene	120-12-7	29,000.	3,300.	ug/kg	10
03778	Fluoranthene	206-44-0	120,000.	33,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	27,000.	3,300.	ug/kg	10
03782	Chrysene	218-01-9	28,000.	3,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	25,000.	3,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	9,600.	3,300.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	16,000.	3,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	7,500.	3,300.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	2,300.	J 3,300.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	5,700.	3,300.	ug/kg	10

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 23:32	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 00:27	William T Parker	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672404

GEO-106(3-4') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 14:45 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10634 SDG#: HMS57-05



Analysis Report

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Lancaster Laboratories Sample No. SW 4672405

GEO-106(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 14:55 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10656 SDG#: HMS57-06

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	15.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	3,100.	170.	ug/kg	1
01195	Pyrene	129-00-0	3,300.	170.	ug/kg	1
03761	Naphthalene	91-20-3	7,100.	830.	ug/kg	5
03765	Acenaphthylene	208-96-8	200.	170.	ug/kg	1
03768	Fluorene	86-73-7	3,900.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	11,000.	830.	ug/kg	5
03776	Anthracene	120-12-7	2,100.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	5,800.	830.	ug/kg	5
03781	Benzo(a)anthracene	56-55-3	1,100.	170.	ug/kg	1
03782	Chrysene	218-01-9	940.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	640.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	310.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	470.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	180.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	58.	J 170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	130.	J 170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 14:46	Joseph M Gambler	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 01:22	William T Parker	5
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672406

GEO-21A(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 15:05 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

21A56 SDG#: HMS57-07

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	2,000.	170.	ug/kg	1
01195	Pyrene	129-00-0	2,300.	170.	ug/kg	1
03761	Naphthalene	91-20-3	3,100.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	110. J	170.	ug/kg	1
03768	Fluorene	86-73-7	2,200.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	6,100.	330.	ug/kg	2
03776	Anthracene	120-12-7	1,100.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	3,100.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	800.	170.	ug/kg	1
03782	Chrysene	218-01-9	570.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	530.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	200.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	370.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	140. J	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	42. J	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	100. J	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 15:41	Joseph M Gambler	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 02:17	William T Parker	2
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672407

GEO-113(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 15:25 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11312 SDG#: HMS57-08

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	25.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	3,500,000.	1,700,000.	ug/kg	1000
01195	Pyrene	129-00-0	7,700,000.	1,700,000.	ug/kg	1000
03761	Naphthalene	91-20-3	4,700,000.	1,700,000.	ug/kg	1000
03765	Acenaphthylene	208-96-8	180,000.	83,000.	ug/kg	50
03768	Fluorene	86-73-7	4,300,000.	1,700,000.	ug/kg	1000
03775	Phenanthrene	85-01-8	12,000,000.	1,700,000.	ug/kg	1000
03776	Anthracene	120-12-7	4,300,000.	1,700,000.	ug/kg	1000
03778	Fluoranthene	206-44-0	12,000,000.	1,700,000.	ug/kg	1000
03781	Benzo(a)anthracene	56-55-3	1,900,000.	83,000.	ug/kg	50
03782	Chrysene	218-01-9	2,400,000.	1,700,000.	ug/kg	1000
03786	Benzo(b)fluoranthene	205-99-2	1,300,000.	83,000.	ug/kg	50
03787	Benzo(k)fluoranthene	207-08-9	580,000.	83,000.	ug/kg	50
03788	Benzo(a)pyrene	50-32-8	780,000.	83,000.	ug/kg	50
03789	Indeno(1,2,3-cd)pyrene	193-39-5	380,000.	83,000.	ug/kg	50
03790	Dibenz(a,h)anthracene	53-70-3	110,000.	83,000.	ug/kg	50
03791	Benzo(g,h,i)perylene	191-24-2	290,000.	83,000.	ug/kg	50

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Surrogate recoveries were outside of QC limits for the GC/MS semivolatile compounds due to the dilution needed to perform the analysis.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 16:07	William T Parker	50
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 17:02	William T Parker	1000



Analysis Report

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Lancaster Laboratories Sample No. SW 4672407

GEO-113(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 15:25 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11312 SDG#: HMS57-08
07806 BNA Soil Extraction

SW-846 3550B

1 12/21/2005 14:10 Melida Reyes

1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672408

GEO-113(3-4') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 15:30 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11334 SDG#: HMS57-09

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	17.9	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	17,000.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	12,000.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	17,000.	1,700.	ug/kg	10
03765	Acenaphthylene	208-96-8	600.	170.	ug/kg	1
03768	Fluorene	86-73-7	22,000.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	56,000.	8,300.	ug/kg	50
03776	Anthracene	120-12-7	8,200.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	19,000.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	3,400.	170.	ug/kg	1
03782	Chrysene	218-01-9	3,000.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	2,200.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	860.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	1,600.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	680.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	220.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	510.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 04:07	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 17:57	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 18:52	William T Parker	50
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672409

GEO-113(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 15:45 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11356 SDG#: HMS57-10

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	15.6	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	67,000.	17,000.	ug/kg	100
01195	Pyrene	129-00-0	39,000.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	230,000.	17,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	2,700.	1,700.	ug/kg	10
03768	Fluorene	86-73-7	82,000.	17,000.	ug/kg	100
03775	Phenanthrene	85-01-8	200,000.	17,000.	ug/kg	100
03776	Anthracene	120-12-7	33,000.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	87,000.	17,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	14,000.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	13,000.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	8,400.	1,700.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	3,400.	1,700.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	6,200.	1,700.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	2,700.	1,700.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	860.	1,700.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	2,200.	1,700.	ug/kg	10
Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.						

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 19:47	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 15:19	William T Parker	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1

Lancaster Laboratories Sample No. SW 4672410

 GEO-112(1-2') Grab Soil Sample
 Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 15:53 by DU

Account Number: 07802

 Submitted: 12/16/2005 09:55
 Reported: 12/29/2005 at 13:20
 Discard: 02/28/2006

 Kerr-McGee Corporation
 PO Box 3048
 Livonia MI 48150

11212 SDG#: HMS57-11

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	19.9	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	84. J	170.	ug/kg	1
01195	Pyrene	129-00-0	38. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	230.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	36. J	170.	ug/kg	1
03768	Fluorene	86-73-7	110. J	170.	ug/kg	1
03775	Phenanthrene	85-01-8	130. J	170.	ug/kg	1
03776	Anthracene	120-12-7	35. J	170.	ug/kg	1
03778	Fluoranthene	206-44-0	61. J	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 05:57	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672411

GEO-112(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 15:55 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11223 SDG#: HMS57-12

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	22.8	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	41. J	170.	ug/kg	1
01195	Pyrene	129-00-0	N.D.	170.	ug/kg	1
03761	Naphthalene	91-20-3	200.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	63. J	170.	ug/kg	1
03775	Phenanthrene	85-01-8	100. J	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	N.D.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 20:42	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672412

GEO-111(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 16:05 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11112 SDG#: HMS57-13

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	28.1	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	18,000.	17,000.	ug/kg	10
01195	Pyrene	129-00-0	450,000.	33,000.	ug/kg	20
03761	Naphthalene	91-20-3	97,000.	17,000.	ug/kg	10
03765	Acenaphthylene	208-96-8	68,000.	17,000.	ug/kg	10
03768	Fluorene	86-73-7	55,000.	17,000.	ug/kg	10
03775	Phenanthrene	85-01-8	99,000.	17,000.	ug/kg	10
03776	Anthracene	120-12-7	450,000.	33,000.	ug/kg	20
03778	Fluoranthene	206-44-0	330,000.	17,000.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	250,000.	17,000.	ug/kg	10
03782	Chrysene	218-01-9	250,000.	17,000.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	490,000.	33,000.	ug/kg	20
03787	Benzo(k)fluoranthene	207-08-9	170,000.	17,000.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	310,000.	17,000.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	200,000.	17,000.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	54,000.	17,000.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	150,000.	17,000.	ug/kg	10

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatiles compounds were raised.

Surrogate recoveries were outside of QC limits for the GC/MS semivolatiles compounds due to the dilution needed to perform the analysis.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 21:38	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 16:14	William T Parker	20



Analysis Report

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Page 2 of 2

Lancaster Laboratories Sample No. SW 4672412

GEO-111(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 16:05 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11112 SDG#: HMS57-13
07806 BNA Soil Extraction

SW-846 3550B

1 12/21/2005 14:10 Melida Reyes

1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672413

GEO-111(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 16:08 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11123 SDG#: HMS57-14

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	20.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	81,000.	17,000.	ug/kg	100
01195	Pyrene	129-00-0	63,000.	17,000.	ug/kg	100
03761	Naphthalene	91-20-3	210,000.	17,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	2,700.	1,700.	ug/kg	10
03768	Fluorene	86-73-7	84,000.	17,000.	ug/kg	100
03775	Phenanthrene	85-01-8	190,000.	17,000.	ug/kg	100
03776	Anthracene	120-12-7	59,000.	17,000.	ug/kg	100
03778	Fluoranthene	206-44-0	99,000.	17,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	18,000.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	16,000.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	12,000.	1,700.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	4,600.	1,700.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	7,700.	1,700.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	3,800.	1,700.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	1,100.	J 1,700.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	2,900.	1,700.	ug/kg	10
Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatiles compounds were raised.						

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 17:09	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 21:45	William T Parker	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672414

GEO-111(4-5') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/14/2005 16:20 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11145 SDG#: HMS57-15

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.8	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	8,300.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	7,500.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	24,000.	1,700.	ug/kg	10
03765	Acenaphthylene	208-96-8	510.	170.	ug/kg	1
03768	Fluorene	86-73-7	10,000.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	23,000.	1,700.	ug/kg	10
03776	Anthracene	120-12-7	5,700.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	12,000.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	2,000.	170.	ug/kg	1
03782	Chrysene	218-01-9	1,900.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	1,200.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	540.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	880.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	340.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	100.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	230.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 23:28	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 18:59	William T Parker	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672415

GEO-110(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 08:30 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11023 SDG#: HMS57-16

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	28.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	160.	J 330.	ug/kg	1
01195	Pyrene	129-00-0	7,500.	670.	ug/kg	2
03761	Naphthalene	91-20-3	540.	330.	ug/kg	1
03765	Acenaphthylene	208-96-8	950.	330.	ug/kg	1
03768	Fluorene	86-73-7	240.	J 330.	ug/kg	1
03775	Phenanthrene	85-01-8	3,200.	330.	ug/kg	1
03776	Anthracene	120-12-7	3,500.	330.	ug/kg	1
03778	Fluoranthene	206-44-0	8,000.	330.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	4,300.	330.	ug/kg	1
03782	Chrysene	218-01-9	5,900.	330.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	7,200.	330.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	2,700.	330.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	3,700.	330.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	2,400.	330.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	740.	330.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	1,900.	330.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 03:40	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 09:15	Joseph M Gambler	2
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672416

GEO-110(3-4') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 08:35 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

11034 SDG#: HMS57-17

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	18.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	54. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	38. J	170.	ug/kg	1
03775	Phenanthrene	85-01-8	160. J	170.	ug/kg	1
03776	Anthracene	120-12-7	36. J	170.	ug/kg	1
03778	Fluoranthene	206-44-0	83. J	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 00:23	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672417

GEO-109(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 09:00 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10901 SDG#: HMS57-18

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	11.7	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	8,300.	ug/kg	10
01195	Pyrene	129-00-0	22,000.	8,300.	ug/kg	10
03761	Naphthalene	91-20-3	4,500. J	8,300.	ug/kg	10
03765	Acenaphthylene	208-96-8	7,900. J	8,300.	ug/kg	10
03768	Fluorene	86-73-7	N.D.	8,300.	ug/kg	10
03775	Phenanthrene	85-01-8	5,200. J	8,300.	ug/kg	10
03776	Anthracene	120-12-7	6,900. J	8,300.	ug/kg	10
03778	Fluoranthene	206-44-0	21,000.	8,300.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	13,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	12,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	35,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	11,000.	8,300.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	20,000.	8,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	16,000.	8,300.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	4,500. J	8,300.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	14,000.	8,300.	ug/kg	10

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 01:18	William T Parker	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Page 1 of 1

Lancaster Laboratories Sample No. SW 4672418

GEO-109(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 09:03 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10912 SDG#: HMS57-19

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	100. J	170.	ug/kg	1
01195	Pyrene	129-00-0	59. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	2,100.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	120. J	170.	ug/kg	1
03775	Phenanthrene	85-01-8	430.	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	110. J	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 02:13	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672419

GEO-109(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 09:05 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:20
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10923 SDG#: HMS57-20*

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	15.7	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	20,000.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	15,000.	1,700.	ug/kg	10
03761	Naphthalene	91-20-3	150,000.	17,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	920. J	1,700.	ug/kg	10
03768	Fluorene	86-73-7	20,000.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	53,000.	17,000.	ug/kg	100
03776	Anthracene	120-12-7	12,000.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	23,000.	1,700.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	5,100.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	4,800.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	2,900.	1,700.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	1,200. J	1,700.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	2,100.	1,700.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	780. J	1,700.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	1,700.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	620. J	1,700.	ug/kg	10
Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.						

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/19/2005 16:35	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 19:55	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 20:50	William T Parker	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/21/2005 14:10	Melida Reyes	1

Quality Control Summary

 Client Name: Kerr-McGee Corporation
 Reported: 12/29/05 at 01:20 PM

Group Number: 971488

Matrix QC may not be reported if site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD was performed, unless otherwise specified in the method.

Laboratory Compliance Quality Control

<u>Analysis Name</u>	<u>Blank Result</u>	<u>Blank LOQ</u>	<u>Report Units</u>	<u>LCS %REC</u>	<u>LCSD %REC</u>	<u>LCS/LCSD Limits</u>	<u>RPD</u>	<u>RPD Max</u>
Batch number: 05353820005A Moisture	Sample number(s): 4672400-4672408,4672411			99		99-101		
Batch number: 05353820005B Moisture	Sample number(s): 4672409-4672410,4672412-4672419			99		99-101		
Batch number: 05355SLC026	Sample number(s): 4672400-4672419							
Acenaphthene	N.D.	170.	ug/kg	88		74-110		
Pyrene	N.D.	170.	ug/kg	90		67-116		
Naphthalene	N.D.	170.	ug/kg	71		70-103		
Acenaphthylene	N.D.	170.	ug/kg	98		66-113		
Fluorene	N.D.	170.	ug/kg	97		66-115		
Phenanthrene	N.D.	170.	ug/kg	86		70-107		
Anthracene	N.D.	170.	ug/kg	84		69-109		
Fluoranthene	N.D.	170.	ug/kg	90		66-109		
Benzo(a)anthracene	N.D.	170.	ug/kg	94		73-111		
Chrysene	N.D.	170.	ug/kg	94		72-110		
Benzo(b)fluoranthene	N.D.	170.	ug/kg	86		68-117		
Benzo(k)fluoranthene	N.D.	170.	ug/kg	91		69-118		
Benzo(a)pyrene	N.D.	170.	ug/kg	93		72-117		
Indeno(1,2,3-cd)pyrene	N.D.	170.	ug/kg	94		66-123		
Dibenz(a,h)anthracene	N.D.	170.	ug/kg	99		70-130		
Benzo(g,h,i)perylene	N.D.	170.	ug/kg	95		66-120		

Sample Matrix Quality Control

<u>Analysis Name</u>	<u>MS %REC</u>	<u>MSD %REC</u>	<u>MS/MSD Limits</u>	<u>RPD</u>	<u>RPD MAX</u>	<u>BKG Conc</u>	<u>DUP Conc</u>	<u>DUP RPD</u>	<u>Dup RPD Max</u>
Batch number: 05353820005A Moisture	Sample number(s): 4672400-4672408,4672411					22.8	22.5	2	15
Batch number: 05353820005B Moisture	Sample number(s): 4672409-4672410,4672412-4672419					18.0	18.0	0	15
Batch number: 05355SLC026	Sample number(s): 4672400-4672419								
Acenaphthene	96	93	47-137	3	30				
Pyrene	123	92	25-159	9	30				
Naphthalene	84	82	54-121	3	30				
Acenaphthylene	108	103	66-137	4	30				
Fluorene	101	102	48-130	1	30				
Phenanthrene	65	63	28-155	1	30				

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Quality Control Summary

 Client Name: Kerr-McGee Corporation
 Reported: 12/29/05 at 01:20 PM

Group Number: 971488

Sample Matrix Quality Control

<u>Analysis Name</u>	<u>MS</u> <u>%REC</u>	<u>MSD</u> <u>%REC</u>	<u>MS/MSD</u> <u>Limits</u>	<u>RPD</u> <u>RPD</u>	<u>RPD</u> <u>MAX</u>	<u>BKG</u> <u>Conc</u>	<u>DUP</u> <u>Conc</u>	<u>DUP</u> <u>RPD</u>	<u>Dup RPD</u> <u>Max</u>
Anthracene	102	94	47-135	4	30				
Fluoranthene	107	80	32-137	8	30				
Benzo(a)anthracene	117	99	39-144	7	30				
Chrysene	122	111	38-144	4	30				
Benzo(b)fluoranthene	160*	131	24-155	8	30				
Benzo(k)fluoranthene	114	114	2-176	0	30				
Benzo(a)pyrene	125	94	38-142	14	30				
Indeno(1,2,3-cd)pyrene	98	70	1-186	18	30				
Dibenz(a,h)anthracene	82	68	44-154	14	30				
Benzo(g,h,i)perylene	70	46	32-150	21	30				

Surrogate Quality Control

 Analysis Name: PAHs in Soil by GC/MS
 Batch number: 05355SLC026

	Nitrobenzene-d5	2-Fluorobiphenyl	Terphenyl-d14
4672400	60	78	99
4672401	53	63	94
4672402	49	56	82
4672403	64	70	91
4672404	70	97	106
4672405	62	68	87
4672406	58	64	86
4672407	75	105	401*
4672408	66	74	95
4672409	87	112	115
4672410	54	64	83
4672411	58	63	84
4672412	83	104	167*
4672413	74	89	103
4672414	66	71	92
4672415	89	94	100
4672416	51	59	83
4672417	78	98	112
4672418	52	64	83
4672419	80	97	117
Blank	49	66	86
LCS	54	78	92
MS	73	84	96
MSD	67	82	99
Limits:	47-128	55-123	51-158

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Analysis Request / Environmental Services Chain of Custody



For Lancaster Laboratories use only

COC # 0107967

Acc. # 07802 Group # 971488 Sample # 4672400319

Please print. Instructions on reverse side correspond with circled numbers.

1 Client: <u>MICHAEL PESANT & ASSOC.</u> Acct. #: _____ Project Name #: _____ PWSID #: _____ Project Manager: <u>UP THE GROVE</u> P.O.#: _____ Sampler: <u>LAP THE GROVE</u> Quote #: _____ Name of state where samples were collected: <u>MASS</u>		5 For Lab Use Only FSC: _____ SCR #: _____	
2 Name of state where samples were collected: <u>MASS</u>		6 Remarks:	
3		9	
4	7 Turnaround Time Requested (TAT) (please circle): <u>Normal</u> Rush (Rush TAT is subject to Lancaster Laboratories approval and surcharge.) Date results are needed: _____ Rush results requested by (please circle): Phone Fax E-mail Phone #: _____ Fax #: _____ E-mail address: _____	8 Data Package Options (please circle if required) SDG Complete? Yes No QC Summary (Type X Type VI (Raw Data)) Type I (Tier I) <u>SM</u> GLP Site-specific QC required? Yes No Type II (Tier II) Other (if yes, indicate QC sample and submit replicate volume.) Type III (NJ Red. Del.) Internal Chain of Custody required? Yes No Type IV (CLP)	9
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

Analysis Request / Environmental Services Chain of Custody



For Lancaster Laboratories use only

Acc. # 07802 Group # 97148 Sample # 467900-19

COC # 0107966

Please print. Instructions on reverse side correspond with circled numbers.

1 Client: _____

Project Name/#: _____

Project Manager: _____

Sampler: _____

Name of state where samples were collected: _____

2

3

Acc. #: _____

PWSID #: _____

P.O.#: _____

Quote #: _____

4

5

6

For Lab Use Only
FSC: _____
SCR #: _____

Sample ID	Time	Date	Remarks
GEU-112/1-2'	1553	12-14-05	X
GEU-112/2-3'	1555	12-14-05	X
GEU-111/1-2'	1605		
GEU-111/2-3'	1608		
GEU-111/4-5'	1620		
GEU-110/2-3'	0830	12-15-05	
GEU-110/3-4'	0835		
GEU-109/0-1'	0900		
GEU-109/1-2'	0903		
GEU-109/2-3'	0905		

7 Turnaround Time Requested (TAT) (please circle): Normal Rush
 (Rush TAT is subject to Lancaster Laboratories approval and surcharge.)
 Date results are needed: _____
 Rush results requested by (please circle): _____ Phone _____ Fax _____ E-mail _____
 Phone #: _____ Fax #: _____
 E-mail address: _____

8 Data Package Options (please circle if required)

QC Summary Type I (Raw Data)	SDG Complete?
Type I (Tier I) <u>GLP</u>	Yes No
Type II (Tier II) <u>Other</u>	Yes No
Type III (NJ Red. Del.)	Yes No
Type IV (CLP)	Yes No

Site-specific QC required? Yes No
 (If yes, indicate QC sample and submit triplicate volume.)
 Internal Chain of Custody required? Yes No

Relinquished by: _____ Date: _____ Time: _____
 Relinquished by: _____ Date: _____ Time: _____
 Relinquished by: _____ Date: _____ Time: _____
 Relinquished by: _____ Date: _____ Time: _____
 Relinquished by: _____ Date: _____ Time: _____

Explanation of Symbols and Abbreviations

The following defines common symbols and abbreviations used in reporting technical data:

N.D.	none detected	BMQL	Below Minimum Quantitation Level
TNTC	Too Numerous To Count	MPN	Most Probable Number
IU	International Units	CP Units	cobalt-chloroplatinate units
umhos/cm	micromhos/cm	NTU	nephelometric turbidity units
C	degrees Celsius	F	degrees Fahrenheit
meq	milliequivalents	lb.	pound(s)
g	gram(s)	kg	kilogram(s)
ug	microgram(s)	mg	milligram(s)
ml	milliliter(s)	l	liter(s)
m3	cubic meter(s)	ul	microliter(s)
<	less than - The number following the sign is the <u>limit of quantitation</u> , the smallest amount of analyte which can be reliably determined using this specific test.		
>	greater than		
J	estimated value – The result is \geq the Method Detection Limit (MDL) and $<$ the Limit of Quantitation (LOQ).		
ppm	parts per million - One ppm is equivalent to one milligram per kilogram (mg/kg), or one gram per million grams. For aqueous liquids, ppm is usually taken to be equivalent to milligrams per liter (mg/l), because one liter of water has a weight very close to a kilogram. For gases or vapors, one ppm is equivalent to one microliter of gas per liter of gas.		
ppb	parts per billion		
Dry weight basis	Results printed under this heading have been adjusted for moisture content. This increases the analyte weight concentration to approximate the value present in a similar sample without moisture. All other results are reported on an as-received basis.		

U.S. EPA CLP Data Qualifiers:

Organic Qualifiers		Inorganic Qualifiers	
A	TIC is a possible aldol-condensation product	B	Value is $<$ CRDL, but \geq IDL
B	Analyte was also detected in the blank	E	Estimated due to interference
C	Pesticide result confirmed by GC/MS	M	Duplicate injection precision not met
D	Compound quantitated on a diluted sample	N	Spike sample not within control limits
E	Concentration exceeds the calibration range of the instrument	S	Method of standard additions (MSA) used for calculation
N	Presumptive evidence of a compound (TICs only)	U	Compound was not detected
P	Concentration difference between primary and confirmation columns $>25\%$	W	Post digestion spike out of control limits
U	Compound was not detected	*	Duplicate analysis not within control limits
X,Y,Z	Defined in case narrative	+	Correlation coefficient for MSA <0.995

Analytical test results for methods listed on the laboratories' accreditation scope meet all requirements of NELAC unless otherwise noted under the individual analysis.

Measurement uncertainty values, as applicable, are available upon request.

Tests results relate only to the sample tested. Clients should be aware that a critical step in a chemical or microbiological analysis is the collection of the sample. Unless the sample analyzed is truly representative of the bulk of material involved, the test results will be meaningless. If you have questions regarding the proper techniques of collecting samples, please contact us. We cannot be held responsible for sample integrity, however, unless sampling has been performed by a member of our staff. This report shall not be reproduced except in full, without the written approval of the laboratory.

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ANALYTICAL RESULTS

Prepared for:

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

734-367-7900

Prepared by:

Lancaster Laboratories
2425 New Holland Pike
Lancaster, PA 17605-2425**SAMPLE GROUP**

The sample group for this submittal is 971492. Samples arrived at the laboratory on Friday, December 16, 2005. The PO# for this group is ZAKWIKK0A90149.

Client Description**Lancaster Labs Number**

GEO-108(1-2') Grab Soil Sample	4672427
GEO-108(3-4') Grab Soil Sample	4672428
GEO-108(5-6') Grab Soil Sample	4672429
GEO-46A(0-1') Grab Soil Sample	4672430
GEO-46A(1-2') Grab Soil Sample	4672431
GEO-46A(2-3') Grab Soil Sample	4672432
GEO-46A(5-6') Grab Soil Sample	4672433
GEO-101(0-1') Grab Soil Sample	4672434
GEO-101(1-2') Grab Soil Sample	4672435
GEO-101(2-3') Grab Soil Sample	4672436
GEO-101(5-6') Grab Soil Sample	4672437
GEO-103(0-1') Grab Soil Sample	4672438
GEO-103(1-2') Grab Soil Sample	4672439
GEO-103(2-3') Grab Soil Sample	4672440
GEO-103(5-6') Grab Soil Sample	4672441
GEO-47A(0-1') Grab Soil Sample	4672442
GEO-47A(1-2') Grab Soil Sample	4672443
GEO-47A(5-6') Grab Soil Sample	4672444
GEO-105(0-1') Grab Soil Sample	4672445
GEO-105(1-2') Grab Soil Sample	4672446

METHODOLOGY



Analysis Report

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The specific methodologies used in obtaining the enclosed analytical results are indicated on the laboratory chronicles.

1 COPY TO	Michael Pisani & Associates	Attn: David Upthegrove
1 COPY TO	Kerr-McGee Corporation	Attn: Roy Widmann
1 COPY TO	Data Package Group	

Questions? Contact your Client Services Representative
Gwen A Birchall at (717) 656-2300

Respectfully Submitted,

A handwritten signature in black ink that reads "Charles J. Neslund".

Charles J. Neslund
Manager



Analysis Report

2425 New Holland Pike, PO Box 12425, Lancaster, PA 17605-2425 • 717-656-2300 Fax: 717-656-2681 • www.lancasterlabs.com

Page 1 of 1

Lancaster Laboratories Sample No. SW 4672427

GEO-108(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 09:45 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10812 SDG#: HMS58-01

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	11.3	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	3,100.	830.	ug/kg	1
01195	Pyrene	129-00-0	97,000.	8,300.	ug/kg	10
03761	Naphthalene	91-20-3	2,800.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	13,000.	830.	ug/kg	1
03768	Fluorene	86-73-7	8,700.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	30,000.	8,300.	ug/kg	10
03776	Anthracene	120-12-7	83,000.	8,300.	ug/kg	10
03778	Fluoranthene	206-44-0	96,000.	8,300.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	45,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	59,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	94,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	33,000.	8,300.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	51,000.	8,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	34,000.	8,300.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	7,400.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	18,000.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/22/2005 20:29	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 19:45	William T Parker	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672428

GEO-108(3-4') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 09:50 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10834 SDG#: HMS58-02

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	13.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	580,000.	170,000.	ug/kg	200
01195	Pyrene	129-00-0	500,000.	170,000.	ug/kg	200
03761	Naphthalene	91-20-3	2,600,000.	170,000.	ug/kg	200
03765	Acenaphthylene	208-96-8	36,000.	8,300.	ug/kg	10
03768	Fluorene	86-73-7	600,000.	170,000.	ug/kg	200
03775	Phenanthrene	85-01-8	1,600,000.	170,000.	ug/kg	200
03776	Anthracene	120-12-7	420,000.	170,000.	ug/kg	200
03778	Fluoranthene	206-44-0	700,000.	170,000.	ug/kg	200
03781	Benzo(a)anthracene	56-55-3	140,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	140,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	95,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	37,000.	8,300.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	64,000.	8,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	29,000.	8,300.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	8,500.	8,300.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	20,000.	8,300.	ug/kg	10

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 20:45	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 21:44	William T Parker	200
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



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Lancaster Laboratories Sample No. SW 4672428

GEO-108(3-4') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 09:50 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10834 SDG#: HMS58-02



Analysis Report

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Lancaster Laboratories Sample No. SW 4672429

GEO-108(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:00 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10856 SDG#: HMS58-03

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	13.5	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	290,000.	83,000.	ug/kg	100
01195	Pyrene	129-00-0	230,000.	83,000.	ug/kg	100
03761	Naphthalene	91-20-3	1,500,000.	83,000.	ug/kg	100
03765	Acenaphthylene	208-96-8	20,000.	8,300.	ug/kg	10
03768	Fluorene	86-73-7	300,000.	83,000.	ug/kg	100
03775	Phenanthrene	85-01-8	810,000.	83,000.	ug/kg	100
03776	Anthracene	120-12-7	140,000.	8,300.	ug/kg	10
03778	Fluoranthene	206-44-0	350,000.	83,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	73,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	64,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	48,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	20,000.	8,300.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	32,000.	8,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	12,000.	8,300.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	3,600.	8,300.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	8,800.	8,300.	ug/kg	10

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatile compounds were raised.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 22:42	William T Parker	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 23:40	William T Parker	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



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Lancaster Laboratories Sample No. SW 4672429

GEO-108(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:00 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10856 SDG#: HMS58-03



Analysis Report

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Lancaster Laboratories Sample No. SW 4672430

GEO-46A(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:10 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

46A01 SDG#: HMS58-04

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	10.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	550.	830.	ug/kg	1
01195	Pyrene	129-00-0	44,000.	4,200.	ug/kg	5
03761	Naphthalene	91-20-3	1,700.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	5,300.	830.	ug/kg	1
03768	Fluorene	86-73-7	1,500.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	6,000.	830.	ug/kg	1
03776	Anthracene	120-12-7	28,000.	4,200.	ug/kg	5
03778	Fluoranthene	206-44-0	34,000.	4,200.	ug/kg	5
03781	Benzo(a)anthracene	56-55-3	19,000.	830.	ug/kg	1
03782	Chrysene	218-01-9	21,000.	4,200.	ug/kg	5
03786	Benzo(b)fluoranthene	205-99-2	36,000.	4,200.	ug/kg	5
03787	Benzo(k)fluoranthene	207-08-9	11,000.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	16,000.	830.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	9,700.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	3,000.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	6,600.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis			Analyst	Dilution Factor
			Trial#	Date and Time			
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13		Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 01:24		William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 00:39		William T Parker	5
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00		Olivia Arosemena	1



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Lancaster Laboratories Sample No. SW 4672431

GEO-46A(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:12 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

46A12 SDG#: HMS58-05

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	11.9	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	120.	170.	ug/kg	1
01195	Pyrene	129-00-0	7,500.	330.	ug/kg	2
03761	Naphthalene	91-20-3	830.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	910.	170.	ug/kg	1
03768	Fluorene	86-73-7	260.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	1,900.	170.	ug/kg	1
03776	Anthracene	120-12-7	4,600.	330.	ug/kg	2
03778	Fluoranthene	206-44-0	5,800.	330.	ug/kg	2
03781	Benzo(a)anthracene	56-55-3	2,800.	170.	ug/kg	1
03782	Chrysene	218-01-9	3,600.	330.	ug/kg	2
03786	Benzo(b)fluoranthene	205-99-2	5,100.	330.	ug/kg	2
03787	Benzo(k)fluoranthene	207-08-9	2,000.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	2,300.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	1,500.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	470.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	1,000.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 02:23	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 01:37	William T Parker	2
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672432

GEO-46A(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:15 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

46A23 SDG#: HMS58-06

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.8	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	N.D.	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	N.D.	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	N.D.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 03:22	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672433

GEO-46A(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:25 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

46A56 SDG#: HMS58-07

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	13.9	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	N.D.	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	N.D.	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	N.D.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 04:21	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672434

GEO-101(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:40 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10101 SDG#: HMS58-08

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	13.8	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	500. J	830.	ug/kg	1
01195	Pyrene	129-00-0	62,000.	8,300.	ug/kg	10
03761	Naphthalene	91-20-3	1,700.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	5,500.	830.	ug/kg	1
03768	Fluorene	86-73-7	1,400.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	19,000.	830.	ug/kg	1
03776	Anthracene	120-12-7	40,000.	8,300.	ug/kg	10
03778	Fluoranthene	206-44-0	54,000.	8,300.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	24,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	25,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	39,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	13,000.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	18,000.	830.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	12,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	3,300.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	8,700.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 02:36	William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 06:36	Brian K Graham	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672435

GEO-101(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:42 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10112 SDG#: HMS58-09

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	12.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	3,300.	830.	ug/kg	1
01195	Pyrene	129-00-0	120,000.	8,300.	ug/kg	10
03761	Naphthalene	91-20-3	8,000.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	6,500.	830.	ug/kg	1
03768	Fluorene	86-73-7	13,000.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	79,000.	8,300.	ug/kg	10
03776	Anthracene	120-12-7	170,000.	8,300.	ug/kg	10
03778	Fluoranthene	206-44-0	120,000.	8,300.	ug/kg	10
03781	Benzo(a)anthracene	56-55-3	43,000.	8,300.	ug/kg	10
03782	Chrysene	218-01-9	45,000.	8,300.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	49,000.	8,300.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	14,000.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	28,000.	8,300.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	13,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	3,900.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	9,300.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis		Analyst	Dilution Factor
				Date and Time			
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13		Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 03:34		William T Parker	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 07:35		Brian K Graham	10
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00		Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672436

GEO-101(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:45 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10123 SDG#: HMS58-10

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	14.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	N.D.	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	N.D.	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	N.D.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 04:32	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672437

GEO-101(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 10:50 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:41
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10156 SDG#: HMS58-11

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	12.9	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	2,600.	1,700.	ug/kg	10
01195	Pyrene	129-00-0	72,000.	17,000.	ug/kg	100
03761	Naphthalene	91-20-3	N.D.	1,700.	ug/kg	10
03765	Acenaphthylene	208-96-8	4,300.	1,700.	ug/kg	10
03768	Fluorene	86-73-7	3,500.	1,700.	ug/kg	10
03775	Phenanthrene	85-01-8	N.D.	1,700.	ug/kg	10
03776	Anthracene	120-12-7	4,700.	1,700.	ug/kg	10
03778	Fluoranthene	206-44-0	47,000.	17,000.	ug/kg	100
03781	Benzo(a)anthracene	56-55-3	20,000.	1,700.	ug/kg	10
03782	Chrysene	218-01-9	23,000.	1,700.	ug/kg	10
03786	Benzo(b)fluoranthene	205-99-2	27,000.	1,700.	ug/kg	10
03787	Benzo(k)fluoranthene	207-08-9	14,000.	1,700.	ug/kg	10
03788	Benzo(a)pyrene	50-32-8	14,000.	1,700.	ug/kg	10
03789	Indeno(1,2,3-cd)pyrene	193-39-5	8,200.	1,700.	ug/kg	10
03790	Dibenz(a,h)anthracene	53-70-3	3,000.	1,700.	ug/kg	10
03791	Benzo(g,h,i)perylene	191-24-2	7,800.	1,700.	ug/kg	10
Due to the sample matrix an initial dilution was necessary to perform the analysis. Therefore, the reporting limits for the GC/MS semivolatiles compounds were raised.						

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/23/2005 18:47	Timothy J Trees	10
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 19:16	Ryan P Byrne	100
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 13:00	Maryan G Attalla	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672438

GEO-103(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:05 by DU Account Number: 07802

Submitted: 12/16/2005 09:55 Kerr-McGee Corporation
Reported: 12/29/2005 at 13:42 PO Box 3048
Discard: 02/28/2006 Livonia MI 48150

10301 SDG#: HMS58-12

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	9.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	100. J	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	57. J	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	98. J	170.	ug/kg	1
03776	Anthracene	120-12-7	59. J	170.	ug/kg	1
03778	Fluoranthene	206-44-0	110. J	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	62. J	170.	ug/kg	1
03782	Chrysene	218-01-9	64. J	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	170.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	62. J	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	84. J	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	77. J	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	63. J	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Analysis		Analyst	Dilution Factor
			Trial#	Date and Time		
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/24/2005 05:30	William T Parker	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672439

GEO-103(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:07 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:42
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10312 SDG#: HMS58-13

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	18.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	290.	830.	ug/kg	1
01195	Pyrene	129-00-0	15,000.	830.	ug/kg	1
03761	Naphthalene	91-20-3	1,300.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	5,100.	830.	ug/kg	1
03768	Fluorene	86-73-7	480.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	2,600.	830.	ug/kg	1
03776	Anthracene	120-12-7	7,900.	830.	ug/kg	1
03778	Fluoranthene	206-44-0	13,000.	830.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	11,000.	830.	ug/kg	1
03782	Chrysene	218-01-9	16,000.	830.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	26,000.	4,200.	ug/kg	5
03787	Benzo(k)fluoranthene	207-08-9	7,400.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	14,000.	830.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	11,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	2,900.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	8,000.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 08:33	Brian K Graham	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 16:20	Brian K Graham	5
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672440

GEO-103(2-3') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:10 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:42
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10323 SDG#: HMS58-14

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	13.7	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	520.	170.	ug/kg	1
01195	Pyrene	129-00-0	6,100.	830.	ug/kg	5
03761	Naphthalene	91-20-3	260.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	700.	170.	ug/kg	1
03768	Fluorene	86-73-7	930.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	4,500.	830.	ug/kg	5
03776	Anthracene	120-12-7	4,200.	830.	ug/kg	5
03778	Fluoranthene	206-44-0	5,800.	830.	ug/kg	5
03781	Benzo(a)anthracene	56-55-3	2,300.	170.	ug/kg	1
03782	Chrysene	218-01-9	2,800.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	3,800.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	1,400.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	2,000.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	1,400.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	400.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	1,000.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 09:31	Brian K Graham	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 07:10	Linda M Hartenstine	5
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672441

GEO-103(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:20 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:42
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10356 SDG#: HMS58-15

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	18.4	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	63. J	170.	ug/kg	1
01195	Pyrene	129-00-0	N.D.	170.	ug/kg	1
03761	Naphthalene	91-20-3	180.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	73. J	170.	ug/kg	1
03775	Phenanthrene	85-01-8	91. J	170.	ug/kg	1
03776	Anthracene	120-12-7	44. J	170.	ug/kg	1
03778	Fluoranthene	206-44-0	N.D.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 10:30	Brian K Graham	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672442

GEO-47A(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:25 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:42
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

47A01 SDG#: HMS58-16

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	13.1	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	300.	J 830.	ug/kg	1
01195	Pyrene	129-00-0	25,000.	1,700.	ug/kg	2
03761	Naphthalene	91-20-3	610.	J 830.	ug/kg	1
03765	Acenaphthylene	208-96-8	5,100.	830.	ug/kg	1
03768	Fluorene	86-73-7	340.	J 830.	ug/kg	1
03775	Phenanthrene	85-01-8	1,400.	830.	ug/kg	1
03776	Anthracene	120-12-7	5,400.	830.	ug/kg	1
03778	Fluoranthene	206-44-0	17,000.	830.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	15,000.	830.	ug/kg	1
03782	Chrysene	218-01-9	14,000.	830.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	28,000.	1,700.	ug/kg	2
03787	Benzo(k)fluoranthene	207-08-9	11,000.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	14,000.	830.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	9,600.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	2,800.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	6,700.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis		Analyst	Dilution Factor
				Date and Time			
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13		Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 11:28		Brian K Graham	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 01:19		Linda M Hartenstine	2
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00		Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672443

GEO-47A(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:27 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:42
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

47A12 SDG#: HMS58-17

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	5.6	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	N.D.	170.	ug/kg	1
01195	Pyrene	129-00-0	N.D.	170.	ug/kg	1
03761	Naphthalene	91-20-3	N.D.	170.	ug/kg	1
03765	Acenaphthylene	208-96-8	N.D.	170.	ug/kg	1
03768	Fluorene	86-73-7	N.D.	170.	ug/kg	1
03775	Phenanthrene	85-01-8	N.D.	170.	ug/kg	1
03776	Anthracene	120-12-7	N.D.	170.	ug/kg	1
03778	Fluoranthene	206-44-0	N.D.	170.	ug/kg	1
03781	Benzo(a)anthracene	56-55-3	N.D.	170.	ug/kg	1
03782	Chrysene	218-01-9	N.D.	170.	ug/kg	1
03786	Benzo(b)fluoranthene	205-99-2	N.D.	170.	ug/kg	1
03787	Benzo(k)fluoranthene	207-08-9	N.D.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	N.D.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	N.D.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	N.D.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	N.D.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 12:27	Brian K Graham	1
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Page 1 of 1

Lancaster Laboratories Sample No. SW 4672444

GEO-47A(5-6') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:35 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:42
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

47A56 SDG#: HMS58-18

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	18.8	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	25,000.	3,300.	ug/kg	20
01195	Pyrene	129-00-0	19,000.	830.	ug/kg	5
03761	Naphthalene	91-20-3	70,000.	3,300.	ug/kg	20
03765	Acenaphthylene	208-96-8	760.	170.	ug/kg	1
03768	Fluorene	86-73-7	19,000.	830.	ug/kg	5
03775	Phenanthrene	85-01-8	55,000.	3,300.	ug/kg	20
03776	Anthracene	120-12-7	7,900.	830.	ug/kg	5
03778	Fluoranthene	206-44-0	30,000.	3,300.	ug/kg	20
03781	Benzo(a)anthracene	56-55-3	7,400.	830.	ug/kg	5
03782	Chrysene	218-01-9	6,000.	830.	ug/kg	5
03786	Benzo(b)fluoranthene	205-99-2	5,300.	830.	ug/kg	5
03787	Benzo(k)fluoranthene	207-08-9	1,900.	170.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	3,100.	170.	ug/kg	1
03789	Indeno(1,2,3-cd)pyrene	193-39-5	1,300.	170.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	340.	170.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	870.	170.	ug/kg	1

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 13:25	Brian K Graham	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 02:18	Linda M Hartenstine	20
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 03:16	Linda M Hartenstine	5
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Page 1 of 1

Lancaster Laboratories Sample No. SW 4672445

GEO-105(0-1') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:45 by DU

Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:42
Discard: 02/28/2006

Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10501 SDG#: HMS58-19

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	20.0	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	680. J	830.	ug/kg	1
01195	Pyrene	129-00-0	30,000.	1,700.	ug/kg	2
03761	Naphthalene	91-20-3	1,700.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	7,700.	830.	ug/kg	1
03768	Fluorene	86-73-7	600. J	830.	ug/kg	1
03775	Phenanthrene	85-01-8	4,700.	830.	ug/kg	1
03776	Anthracene	120-12-7	7,400.	830.	ug/kg	1
03778	Fluoranthene	206-44-0	25,000.	1,700.	ug/kg	2
03781	Benzo(a)anthracene	56-55-3	22,000.	1,700.	ug/kg	2
03782	Chrysene	218-01-9	18,000.	1,700.	ug/kg	2
03786	Benzo(b)fluoranthene	205-99-2	34,000.	1,700.	ug/kg	2
03787	Benzo(k)fluoranthene	207-08-9	13,000.	830.	ug/kg	1
03788	Benzo(a)pyrene	50-32-8	21,000.	1,700.	ug/kg	2
03789	Indeno(1,2,3-cd)pyrene	193-39-5	13,000.	830.	ug/kg	1
03790	Dibenz(a,h)anthracene	53-70-3	3,700.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	10,000.	830.	ug/kg	1

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis Date and Time	Analyst	Dilution Factor
00111	Moisture	EPA 160.3 modified	1	12/20/2005 18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005 14:23	Brian K Graham	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005 04:15	Linda M Hartenstine	2
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005 01:00	Olivia Arosemena	1



Analysis Report

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Lancaster Laboratories Sample No. SW 4672446

GEO-105(1-2') Grab Soil Sample
Gulf States Creosoting/Hattiesburg, MS

Collected: 12/15/2005 11:47 by DU Account Number: 07802

Submitted: 12/16/2005 09:55
Reported: 12/29/2005 at 13:42
Discard: 02/28/2006
Kerr-McGee Corporation
PO Box 3048
Livonia MI 48150

10512 SDG#: HMS58-20*

CAT No.	Analysis Name	CAS Number	As Received Result	As Received Limit of Quantitation	Units	Dilution Factor
00111	Moisture	n.a.	17.2	0.50	%	1
"Moisture" represents the loss in weight of the sample after oven drying at 103 - 105 degrees Celsius. The moisture result reported above is on an as-received basis.						
07804	PAHs in Soil by GC/MS					
01191	Acenaphthene	83-32-9	2,100.	830.	ug/kg	1
01195	Pyrene	129-00-0	140,000.	17,000.	ug/kg	20
03761	Naphthalene	91-20-3	10,000.	830.	ug/kg	1
03765	Acenaphthylene	208-96-8	26,000.	4,200.	ug/kg	5
03768	Fluorene	86-73-7	5,600.	830.	ug/kg	1
03775	Phenanthrene	85-01-8	13,000.	830.	ug/kg	1
03776	Anthracene	120-12-7	65,000.	4,200.	ug/kg	5
03778	Fluoranthene	206-44-0	72,000.	4,200.	ug/kg	5
03781	Benzo(a)anthracene	56-55-3	61,000.	4,200.	ug/kg	5
03782	Chrysene	218-01-9	66,000.	4,200.	ug/kg	5
03786	Benzo(b)fluoranthene	205-99-2	180,000.	17,000.	ug/kg	20
03787	Benzo(k)fluoranthene	207-08-9	51,000.	4,200.	ug/kg	5
03788	Benzo(a)pyrene	50-32-8	99,000.	4,200.	ug/kg	5
03789	Indeno(1,2,3-cd)pyrene	193-39-5	67,000.	4,200.	ug/kg	5
03790	Dibenz(a,h)anthracene	53-70-3	12,000.	830.	ug/kg	1
03791	Benzo(g,h,i)perylene	191-24-2	52,000.	4,200.	ug/kg	5

Due to sample matrix interferences observed during the extraction, the normal reporting limits could not be obtained.

Laboratory Chronicle

CAT No.	Analysis Name	Method	Trial#	Analysis		Analyst	Dilution Factor
				Date	Time		
00111	Moisture	EPA 160.3 modified	1	12/20/2005	18:13	Scott W Freisher	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/27/2005	15:22	Brian K Graham	1
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005	05:13	Linda M Hartenstine	20
07804	PAHs in Soil by GC/MS	SW-846 8270C	1	12/28/2005	06:12	Linda M Hartenstine	5
07806	BNA Soil Extraction	SW-846 3550B	1	12/22/2005	01:00	Olivia Arosemena	1

Quality Control Summary

 Client Name: Kerr-McGee Corporation
 Reported: 12/29/05 at 01:42 PM

Group Number: 971492

Matrix QC may not be reported if site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD was performed, unless otherwise specified in the method.

Laboratory Compliance Quality Control

<u>Analysis Name</u>	<u>Blank Result</u>	<u>Blank LOQ</u>	<u>Report Units</u>	<u>LCS %REC</u>	<u>LCSD %REC</u>	<u>LCS/LCSD Limits</u>	<u>RPD</u>	<u>RPD Max</u>
Batch number: 05354820003A	Sample number(s): 4672427-4672436							
Moisture				100		99-101		
Batch number: 05354820003B	Sample number(s): 4672437-4672446							
Moisture				100		99-101		
Batch number: 05355SLG026	Sample number(s): 4672427-4672436, 4672438-4672446							
Acenaphthene	N.D.	170.	ug/kg	97		74-110		
Pyrene	N.D.	170.	ug/kg	98		67-116		
Naphthalene	N.D.	170.	ug/kg	83		70-103		
Acenaphthylene	N.D.	170.	ug/kg	112		66-113		
Fluorene	N.D.	170.	ug/kg	95		66-115		
Phenanthrene	N.D.	170.	ug/kg	96		70-107		
Anthracene	N.D.	170.	ug/kg	93		69-109		
Fluoranthene	N.D.	170.	ug/kg	90		66-109		
Benzo (a) anthracene	N.D.	170.	ug/kg	98		73-111		
Chrysene	N.D.	170.	ug/kg	94		72-110		
Benzo (b) fluoranthene	N.D.	170.	ug/kg	93		68-117		
Benzo (k) fluoranthene	N.D.	170.	ug/kg	95		69-118		
Benzo (a) pyrene	N.D.	170.	ug/kg	96		72-117		
Indeno (1,2,3-cd) pyrene	N.D.	170.	ug/kg	100		66-123		
Dibenz (a,h) anthracene	N.D.	170.	ug/kg	105		70-130		
Benzo (g,h,i) perylene	N.D.	170.	ug/kg	99		66-120		
Batch number: 05356SLC026	Sample number(s): 4672437							
Acenaphthene	N.D.	170.	ug/kg	90		74-110		
Pyrene	N.D.	170.	ug/kg	87		67-116		
Naphthalene	N.D.	170.	ug/kg	91		70-103		
Acenaphthylene	N.D.	170.	ug/kg	94		66-113		
Fluorene	N.D.	170.	ug/kg	95		66-115		
Phenanthrene	N.D.	170.	ug/kg	96		70-107		
Anthracene	N.D.	170.	ug/kg	92		69-109		
Fluoranthene	N.D.	170.	ug/kg	94		66-109		
Benzo (a) anthracene	N.D.	170.	ug/kg	93		73-111		
Chrysene	N.D.	170.	ug/kg	90		72-110		
Benzo (b) fluoranthene	N.D.	170.	ug/kg	95		68-117		
Benzo (k) fluoranthene	N.D.	170.	ug/kg	94		69-118		
Benzo (a) pyrene	N.D.	170.	ug/kg	95		72-117		
Indeno (1,2,3-cd) pyrene	N.D.	170.	ug/kg	99		66-123		
Dibenz (a,h) anthracene	N.D.	170.	ug/kg	103		70-130		
Benzo (g,h,i) perylene	N.D.	170.	ug/kg	95		66-120		

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Quality Control Summary

 Client Name: Kerr-McGee Corporation
 Reported: 12/29/05 at 01:42 PM

Group Number: 971492

Sample Matrix Quality Control

<u>Analysis Name</u>	<u>MS</u> <u>%RRC</u>	<u>MSD</u> <u>%RRC</u>	<u>MS/MSD</u> <u>Limits</u>	<u>RPD</u> <u>RPD</u> <u>MAX</u>	<u>BKG</u> <u>Conc</u>	<u>DUP</u> <u>Conc</u>	<u>DUP</u> <u>RPD</u>	<u>Dup RPD</u> <u>Max</u>
Batch number: 05354820003A Moisture	Sample number(s): 4672427-4672436				14.8	15.1	2	15
Batch number: 05354820003B Moisture	Sample number(s): 4672437-4672446				18.4	18.5	1	15
Batch number: 05355SLG026	Sample number(s): 4672427-4672436, 4672438-4672446							
Acenaphthene	96	95	47-137	0	30			
Pyrene	(2)	(2)	25-159	18	30			
Naphthalene	96	100	54-121	2	30			
Acenaphthylene	77	118	66-137	9	30			
Fluorene	14*	10*	48-130	2	30			
Phenanthrene	(2)	(2)	28-155	8	30			
Anthracene	(2)	(2)	47-135	1	30			
Fluoranthene	(2)	(2)	32-137	18	30			
Benzo(a)anthracene	(2)	(2)	39-144	17	30			
Chrysene	(2)	(2)	38-144	16	30			
Benzo(b)fluoranthene	(2)	(2)	24-155	25	30			
Benzo(k)fluoranthene	(2)	(2)	2-176	8	30			
Benzo(a)pyrene	(2)	(2)	38-142	18	30			
Indeno(1,2,3-cd)pyrene	(2)	(2)	1-186	13	30			
Dibenz(a,h)anthracene	43*	74	44-154	11	30			
Benzo(g,h,i)perylene	(2)	(2)	32-150	11	30			
Batch number: 05356SLC026	Sample number(s): 4672437							
Acenaphthene	94	89	47-137	5	30			
Pyrene	88	86	25-159	2	30			
Naphthalene	88	88	54-121	1	30			
Acenaphthylene	98	91	66-137	8	30			
Fluorene	99	93	48-130	6	30			
Phenanthrene	86	83	28-155	4	30			
Anthracene	91	90	47-135	1	30			
Fluoranthene	87	84	32-137	3	30			
Benzo(a)anthracene	97	94	39-144	4	30			
Chrysene	92	89	38-144	3	30			
Benzo(b)fluoranthene	97	95	24-155	2	30			
Benzo(k)fluoranthene	94	92	2-176	2	30			
Benzo(a)pyrene	98	95	38-142	3	30			
Indeno(1,2,3-cd)pyrene	103	97	1-186	6	30			
Dibenz(a,h)anthracene	108	104	44-154	4	30			
Benzo(g,h,i)perylene	98	94	32-150	4	30			

Surrogate Quality Control

Analysis Name: PAHs in Soil by GC/MS

Batch number: 05355SLG026

	Nitrobenzene-d5	2-Fluorobiphenyl	Terphenyl-d14
4672427	92	103	127
4672428	96	104	128
4672429	81	106	110

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Quality Control Summary

Client Name: Kerr-McGee Corporation
Reported: 12/29/05 at 01:42 PM

Group Number: 971492

Surrogate Quality Control

4672430	83	97	116
4672431	81	89	90
4672432	74	78	91
4672433	75	78	93
4672434	93	101	113
4672435	94	101	130
4672436	83	87	93
4672438	86	87	83
4672439	97	101	102
4672440	91	95	91
4672441	80	81	84
4672442	88	99	100
4672443	85	83	88
4672444	90	82	93
4672445	95	100	119
4672446	86	93	132
Blank	97	96	107
LCS	91	92	98
MS	93	101	116
MSD	94	97	123

Limits: 47-128 55-123 51-158

Analysis Name: PAHs in Soil by GC/MS
Batch number: 05356SLC026

	Nitrobenzene-d5	2-Fluorobiphenyl	Terphenyl-d14
4672437	80	89	92
Blank	83	88	88
LCS	86	86	88
MS	84	92	92
MSD	86	87	90

Limits: 47-128 55-123 51-158

*- Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The background result was more than four times the spike added.

Analysis Request / Environmental Services Chain of Custody



For Lancaster Laboratories use only

COC # 0107968

Acct. 07802 Group # 971492 Sample # 3 OF 5

Please print. Instructions on reverse side correspond with carded numbers.

1 Client: _____ Acct. #: _____

Project Name #: _____ PWSID #: _____

Project Manager: _____ P.O.#: _____

Sampler: _____ Quote #: _____

2 Name of state where samples were collected: _____

3 _____

4 _____

5 PAKS L 220

6 For Lab Use Only
FSC: _____
SCR #: _____

Sample ID	Acct. #	PWSID #	P.O.#	Quote #	Remarks
GE0-102/1-2'	12-15-05	0945			X
GE0-102/3-4'		0950			
GE0-102/5-6'		1000			
GE0-46A/0-1'		1010			
GE0-46A/1-2'		1012			
GE0-46A/2-3'		1015			
GE0-46A/5-6'		1025			
GE0-101/0-1'		1040			
GE0-101/1-2'		1042			
GE0-101/2-3'		1045			

7 Turnaround Time Requested (TAT) (please circle) Normal Rush
 (Rush TAT is subject to Lancaster Laboratories approval and surcharge.)

Date results are needed: _____

Rush results requested by (please circle): _____ Phone _____ Fax _____ E-mail _____

Phone #: _____ Fax #: _____

E-mail address: _____

8 Data Package Options (please circle if required)

QC Summary	Type I (Raw Data)	Type VI (Raw Data)	SDG Complete?
Type I (Tier I)	GLP	Other	Yes No
Type II (Tier II)	GLP	Other	Yes No
Type III (NJ Red. Del.)	GLP	Other	Yes No
Type IV (GLP)	GLP	Other	Yes No

Relinquished by: _____ Date: _____ Time: _____

Relinquished by: _____ Date: _____ Time: _____

Relinquished by: _____ Date: _____ Time: _____

Relinquished by: _____ Date: _____ Time: _____

Relinquished by: _____ Date: _____ Time: _____

Relinquished by: _____ Date: _____ Time: _____

Analysis Request / Environmental Services Chain of Custody



For Lancaster Laboratories use only

Acc. # D7802 Group # 971492 Sample # 4 of 5

COC # 0107969

Please print. Instructions on reverse side correspond with circled numbers.

<p>1 Client: _____</p> <p>Project Name/#: _____</p> <p>Project Manager: _____</p> <p>Sampler: _____</p> <p>Name of state where samples were collected: _____</p>		<p>2</p> <p>3</p>		<p>4</p> <p>5</p>		<p>6</p> <p>Remarks</p>		<p>For Lab Use Only</p> <p>FSC: _____</p> <p>SCR #: _____</p>	
<p>Acc. #: _____</p> <p>PWSID #: _____</p> <p>P.O.#: _____</p> <p>Quote #: _____</p>	<p>12-15-04</p> <p>1050</p> <p>1105</p> <p>1107</p> <p>1110</p> <p>1120</p> <p>1125</p> <p>1127</p> <p>1135</p> <p>1145</p> <p>1147</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>PAHS by SHH</p>	<p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p>	<p>Time</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p>	<p>Received by:</p> <p>Received by:</p> <p>Received by:</p> <p>Received by:</p> <p>Received by:</p> <p>Received by:</p> <p>Received by:</p> <p>Received by:</p> <p>Received by:</p>	<p>Date</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p> <p>12-15-04</p>	<p>Time</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p> <p>16:30</p>
<p>7 Turnaround Time Requested (TAT) (please circle): Normal <input checked="" type="radio"/> Rush <input type="radio"/></p> <p>(Rush TAT is subject to Lancaster Laboratories approval and surcharge.)</p> <p>Date results are needed: _____</p> <p>Rush results requested by (please circle): Phone Fax E-mail</p> <p>Phone #: _____ Fax #: _____</p> <p>E-mail address: _____</p>		<p>8</p> <p>Data Package Options (please circle if required)</p> <p>QC Summary <input checked="" type="radio"/> Type VI (Raw Data) <input type="radio"/> SDG Complete? Yes No</p> <p>Type I (Tier I) <input checked="" type="radio"/> STA <input type="radio"/> GLP Site-specific QC required? Yes No</p> <p>Type II (Tier II) <input type="radio"/> Other (If yes, indicate QC sample and submit triplicate volume.)</p> <p>Type III (NJ Red. Del.) Internal Chain of Custody required? Yes No</p> <p>Type IV (CLP)</p>		<p>9</p> <p>10</p>		<p>11</p> <p>12</p>		<p>13</p> <p>14</p>	

Explanation of Symbols and Abbreviations

The following defines common symbols and abbreviations used in reporting technical data:

N.D.	none detected	BMQL	Below Minimum Quantitation Level
TNTC	Too Numerous To Count	MPN	Most Probable Number
IU	International Units	CP Units	cobalt-chloroplatinate units
umhos/cm	micromhos/cm	NTU	nephelometric turbidity units
C	degrees Celsius	F	degrees Fahrenheit
meq	milliequivalents	lb.	pound(s)
g	gram(s)	kg	kilogram(s)
ug	microgram(s)	mg	milligram(s)
ml	milliliter(s)	l	liter(s)
m3	cubic meter(s)	ul	microliter(s)
<	less than - The number following the sign is the <u>limit of quantitation</u> , the smallest amount of analyte which can be reliably determined using this specific test.		
>	greater than		
J	estimated value – The result is \geq the Method Detection Limit (MDL) and $<$ the Limit of Quantitation (LOQ).		
ppm	parts per million - One ppm is equivalent to one milligram per kilogram (mg/kg), or one gram per million grams. For aqueous liquids, ppm is usually taken to be equivalent to milligrams per liter (mg/l), because one liter of water has a weight very close to a kilogram. For gases or vapors, one ppm is equivalent to one microliter of gas per liter of gas.		
ppb	parts per billion		
Dry weight basis	Results printed under this heading have been adjusted for moisture content. This increases the analyte weight concentration to approximate the value present in a similar sample without moisture. All other results are reported on an as-received basis.		

U.S. EPA CLP Data Qualifiers:

Organic Qualifiers		Inorganic Qualifiers	
A	TIC is a possible aldol-condensation product	B	Value is $<$ CRDL, but \geq IDL
B	Analyte was also detected in the blank	E	Estimated due to interference
C	Pesticide result confirmed by GC/MS	M	Duplicate injection precision not met
D	Compound quantitated on a diluted sample	N	Spike sample not within control limits
E	Concentration exceeds the calibration range of the instrument	S	Method of standard additions (MSA) used for calculation
N	Presumptive evidence of a compound (TICs only)	U	Compound was not detected
P	Concentration difference between primary and confirmation columns $>$ 25%	W	Post digestion spike out of control limits
U	Compound was not detected	*	Duplicate analysis not within control limits
X,Y,Z	Defined in case narrative	+	Correlation coefficient for MSA $<$ 0.995

Analytical test results for methods listed on the laboratories' accreditation scope meet all requirements of NELAC unless otherwise noted under the individual analysis.

Measurement uncertainty values, as applicable, are available upon request.

Tests results relate only to the sample tested. Clients should be aware that a critical step in a chemical or microbiological analysis is the collection of the sample. Unless the sample analyzed is truly representative of the bulk of material involved, the test results will be meaningless. If you have questions regarding the proper techniques of collecting samples, please contact us. We cannot be held responsible for sample integrity, however, unless sampling has been performed by a member of our staff. This report shall not be reproduced except in full, without the written approval of the laboratory.

WARRANTY AND LIMITS OF LIABILITY - In accepting analytical work, we warrant the accuracy of test results for the sample as submitted. THE FOREGOING EXPRESS WARRANTY IS EXCLUSIVE AND IS GIVEN IN LIEU OF ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED. WE DISCLAIM ANY OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING A WARRANTY OF FITNESS FOR PARTICULAR PURPOSE AND WARRANTY OF MERCHANTABILITY. IN NO EVENT SHALL LANCASTER LABORATORIES BE LIABLE FOR INDIRECT, SPECIAL, CONSEQUENTIAL, OR INCIDENTAL DAMAGES INCLUDING, BUT NOT LIMITED TO, DAMAGES FOR LOSS OF PROFIT OR GOODWILL REGARDLESS OF (A) THE NEGLIGENCE (EITHER SOLE OR CONCURRENT) OF LANCASTER LABORATORIES AND (B) WHETHER LANCASTER LABORATORIES HAS BEEN INFORMED OF THE POSSIBILITY OF SUCH DAMAGES. We accept no legal responsibility for the purposes for which the client uses the test results. No purchase order or other order for work shall be accepted by Lancaster Laboratories which includes any conditions that vary from the Standard Terms and Conditions of Lancaster Laboratories and we hereby object to any conflicting terms contained in any acceptance or order submitted by client.



STATE OF MISSISSIPPI


HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

MEMORANDUM

TO: Gulf States Creosote Site File
Hattiesburg, Mississippi

FROM: Tony Russell 

DATE: December 20, 2005

SUBJECT: Groundwater Sampling Event Conducted, Investigation of Will Harris Property & Sampling of Railroad ROW

I met with Brad Blalock on December 13 & 14 to observe and split samples during the groundwater sampling event at the old Gulf States Creosote site in Hattiesburg. Brad purged the wells prior to collecting the samples. I collected splits on monitoring wells 14 (Fill Area Well) and 18 (Process Area Well) during the sampling event. The samples will be analyzed for volatiles and semi-volatiles at the OPC lab in Pearl.

I also met with Dave Upthegrove on December 13 to observe the evaluation of Mr. Will Harris property for creosote contamination in the vicinity of the old drainage ditch. It took several borings to locate and define the boundary of the old drainage ditch. Some creosote contamination was discovered within the confines of the old drainage ditch. The investigation was conducted using a push-probe rig. A Mr. Hall(?) from New York (stated he represented the community) showed up with Channel 7 news.

On December 14, soil samples were collected from the property adjacent to the railroad ROW. The samples were collected using a push-probe rig. Soil samples were not collected from the fill material at the surface. I collected a split on boring locations GEO-102 at the 5 to 6 foot interval and at GEO-113 at the 3 to 4 foot interval. Due to access issues with the railroad, the railroad ROW would be sampled the next day. Several borings were contaminated based on visual observations and odors. The samples will be analyzed for semi-volatiles at the OPC lab in Pearl.

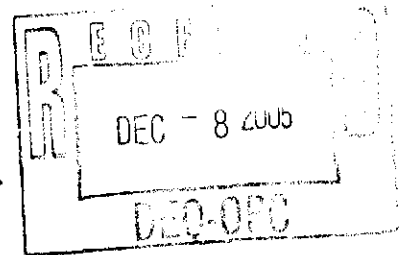
No photos were taken during this sampling event.

OFFICE OF POLLUTION CONTROL

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FAX: (318) 227-1141

DAVID P. MINVIELLE
(504) 684-9180
dminvielle@lemle.com

December 2, 2005

Mr. Tony Russell
Assessment Remediation Branch
MDEQ Office of Pollution Control
101 Capitol Centre
101 W. Capitol Street
Jackson, MS 39201

Re: *Addendum to Soil Sampling and Analysis Plan*
Area between Courtesy Ford and Norfolk Southern Railroad
Hattiesburg, Mississippi

Dear Mr. Russell:

Alabama Great Southern ("AGS") has reviewed the Soil Sampling and Analysis Plan and the above referenced addendum. While the addendum is a significant improvement over the plan as originally submitted, AGS remains concerned that contaminated soil deeper than 4 feet bls on AGS' right-of-way would not be sampled if there is no obvious contamination at 4 feet bls, and if sampled, then not analyzed if there is no obvious contamination between 3 feet and 6 feet bls. AGS is concerned that shallow sources of contaminants on the low-lying portion of the site, such as the drainage ditch, could have moved horizontally towards the higher portion of the site that is the railroad embankment. For example, contaminants in the bottom of the ditch (i.e., 2 to 4 feet bls) might have migrated horizontally under the elevated embankment that is several feet higher than the bottom of the ditch. Because of the surface elevation difference, the horizontally migrating contaminants could be present at depths greater than 4 feet bls under the embankment without exhibiting any obvious contamination in the 0' - 4' sample intervals.

As MDEQ noted in its comments, contamination has been detected down to 6 feet bls, and at least as deep as 10 feet bls in GEO-20 and 8 feet bls in GEO-47. However, AGS suggest that the 2' - 3' and 5' - 6' sample intervals be sampled and analyzed from the new borings on the elevated portions of the right-of-way (GEO- 101, 103, 105). This results in the analyses of only six additional samples. GEO-46A and 47A (and GEO-48A, as well) need not be re-sampled provided that the existing data from these borings is used for comparison to the site specific, risk-based cleanup levels. Note that these areas were not disturbed.

December 2, 2005

Page 2

With respect to comparison of the data to the site-specific risk-based levels, it is unclear whether the existing sample data for GEO-46 through GEO-48 will be used for comparison purposes. Kerr-McGee stated that the purpose for re-sampling these locations was that the data is three to five years old. While AGS accepts that natural variations in contaminant distribution and variations in sampling techniques/samplers can cause significant differences in analytical results, AGS does not accept that significant changes in chemical concentrations of high molecular weight PAHs would have occurred following a three to five year time span when these chemicals have presumably existed in the soil for many years. Unless there was some defect in prior sampling and analyses procedures, AGS does not agree that the new sample data would be more representative of current site conditions than the existing sample data. AGS therefore suggests that the existing sample data be retained for comparison to site-specific, risk-based cleanup levels.

Finally, Kerr-McGee suggested during the meeting in Jackson that it may "fingerprint" the chemical analyses to determine whether the source of the PAHs was from the Former Gulf States Creosoting Site or from other "industrial" sources. While this is not part of the sampling and analysis plan, AGS would not agree with a conclusion based on fingerprinting that the PAHs present beneath its right-of-way are from a source other than the Former Gulf States Creosoting Site. The clearest evidence that the Former Gulf States Creosoting Site is the source of PAH contamination is that contamination can be found on the creosote plant side of the tracks, and is absent on the opposite side of the track.

We hope you consider these comments to be constructive and helpful. Please call me at the above letterhead number or on my cell phone at 504.616.4285 if you have any questions.

Sincerely,

LEMLE & KELLEHER, L.L.P.



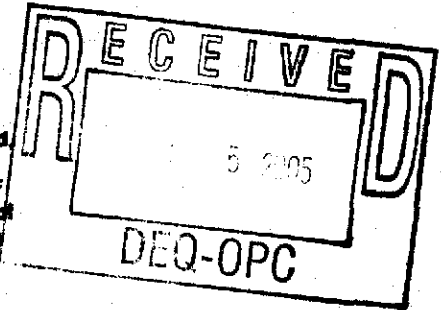
David P. Minvielle

CC: Jane Raiford
Mary-Jacq Easley

STATE OF MISSISSIPPI
COUNTY OF FORREST
CITY OF HATTIESBURG

DRAINAGE EASEMENT

For and in consideration of the sum of Ten Dollars (\$10.00), cash in hand paid and other good and valuable considerations, including the benefits to be derived herefrom from CLEVESTER H. AND WILLIE WOODS, do hereby grant and convey unto CITY OF HATTIESBURG, a municipal corporation, an easement over, across and upon a part of real property, for the construction and maintenance of drainage facilities over and across the following described real property located in the City of Hattiesburg, Forrest County, Mississippi:



A 15' wide Permanent Drainage Easement being part of the Southwest 1/4 of the Northeast 1/4 of Section 16, T-4-N, R-13-W, Forrest County, Mississippi, being 7.6' either side of a centerline more particularly described as follows:
Begin at the Southwest corner of Lot 5, Block 3, of D.D. McInnis 3rd Addition and thence run Northeasterly along the Northwestern line of said Lot 5 for 70.84 feet to and for the Point-of-Beginning; thence run S 72°43'30" E for 58.29 feet, more or less, to the Southeastern line of said Lot 5 and the Point-of-Ending. The above herein described Permanent Drainage Easement contains .018 acres.

And also an additional 10 foot Temporary Construction Easement running parallel with and adjacent to the Northern and Southern lines of the above herein described Permanent Drainage Easement.

I/we fully understand that we have the right to receive just compensation for the use of the real property herein described based on an appraisal of said property. I/we hereby waive our right to just compensation and donate the use of real property herein described to the City of Hattiesburg. I/we further understand that we have the right to request that a fair market value appraisal of the property be made and I/we hereby waive that right.

The Grantee herein is given the right to do whatever may be necessary or proper for the enjoyment of the rights herein granted, including the right of ingress and egress and the right to clear said right-of-way so selected of such shrubs, trees and other vegetation as may be necessary.

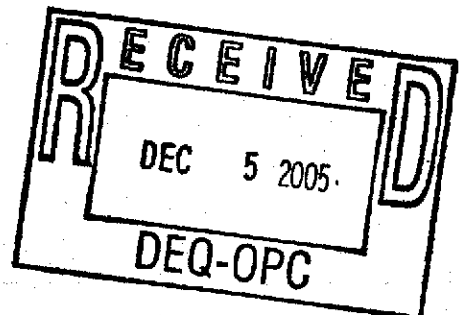
WITNESS OUR SIGNATURES on this, the 9 day of July A.D. 2005.
Clevester Woods

This day there came and appeared before me, the undersigned authority in and for County and State, the within named CLEVESTER H. AND WILLIE WOODS, who acknowledged before me that he/she signed, executed and delivered the above and foregoing easement on the day and year therein mentioned as their own free and voluntary act and deed.

Given under my hand and official seal of this office on this, the 9th day of July A.D. 2005.

My Commission Expires September 08, 2004
Bonded Title State Notary Service, Inc.

[Signature]
NOTARY PUBLIC

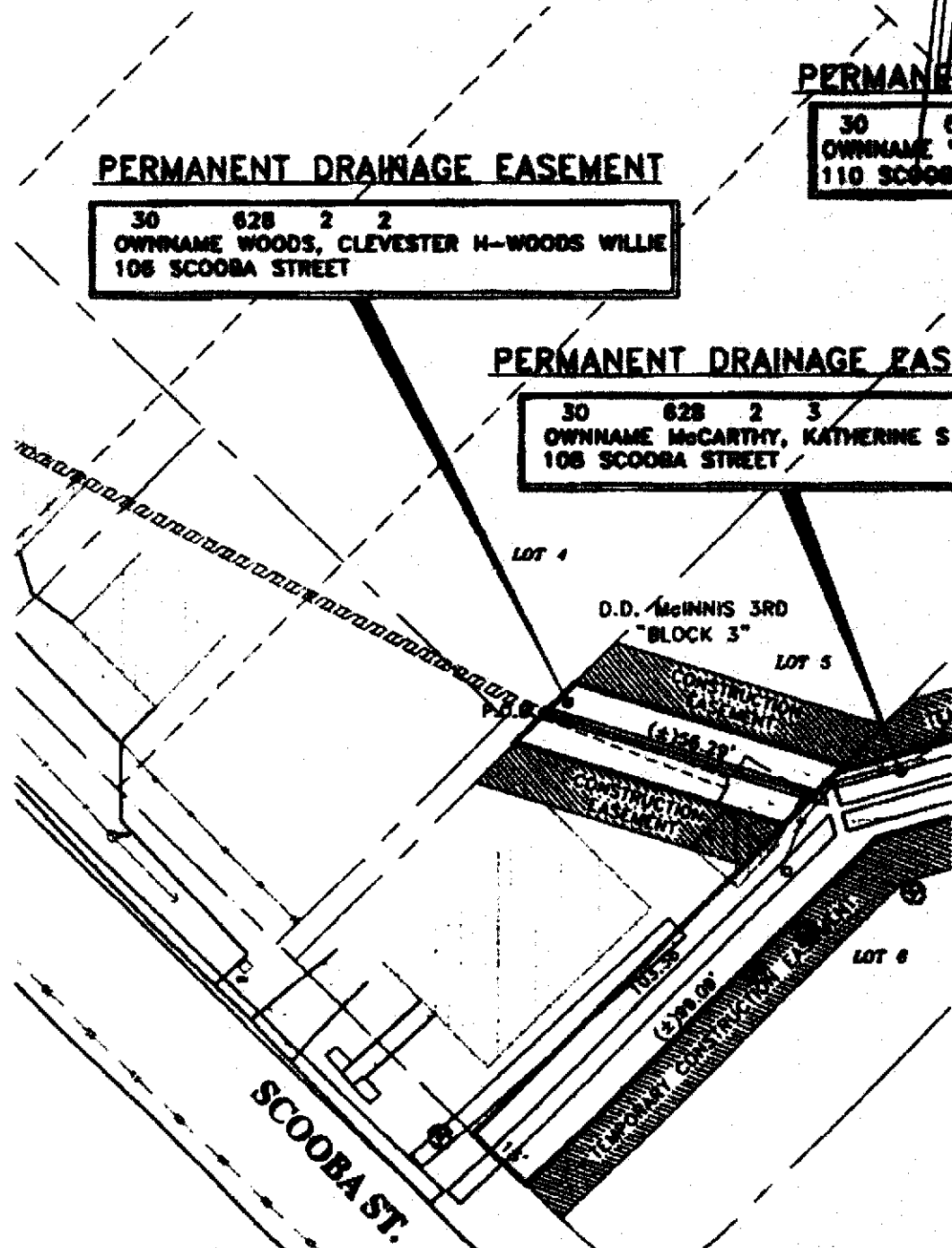


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30 OWNNAME
110 SCOBA

PERMANENT DRAINAGE EASEMENT
30 628 2 2
OWNNAME WOODS, CLEVESTER H-WOODS WILLIE
108 SCOBA STREET

PERMANENT DRAINAGE EAS
30 628 2 3
OWNNAME McARTHUR, KATHERINE S
108 SCOBA STREET





"Dave Upthegrove"
<dupthegrove@ix.netcom.com>
m>

12/05/2005 08:31 AM

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

cc "Keith Watson" <kwatson@kmg.com>, "T. L. Cubbage"
<tcubbage@kmg.com>, "Jane Raiford"
<jane.raiford@arlaw.com>, "Billy Waits"

bcc

Subject RE: Woods access agreement

History:

✉ This message has been replied to.

Jane is out until tomorrow, but Gayle Jordan called me Friday afternoon and indicated she was working on the access agreement. She asked about number of borings, distance from the tracks, etc. Unless they throw us a real curveball, I anticipate having an agreement in place by mid-week. I've already scheduled a rig and lab space and Billy Waits is surveying the previous six borings locations later this week. We plan on getting started drilling at around 9 AM on Monday, December 12.

David C. Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
(281) 242-5700 (phone)
(281) 242-1737 (fax)
(504) 481-6470 (cellular)
dupthegrove@ix.netcom.com

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

From: Tony_Russell@deq.state.ms.us [mailto:Tony_Russell@deq.state.ms.us]
Sent: Monday, December 05, 2005 8:13 AM
To: dupthegrove@ix.netcom.com
Subject: RE: Woods access agreement

Thanks, we could not find our copy in the file for some reason.

How is access issue going with the RR??

Tony Russell
Mississippi Department of Environmental Quality
Assessment Remediation Branch Chief
101 West Capitol Street
Jackson, MS 39201
Phone 601-961-5318
Fax 601-961-5300

--
No virus found in this incoming message.
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Version: 7.1.362 / Virus Database: 267.13.12/192 - Release Date: 12/5/2005

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November 23 2005

David Upthegrove
Michael Pisani & Associates
1100 Poydras Street
1430 Energy Centre
New Orleans, LA 70163

Re: Calculation of Site-Specific Cleanup Standards
Hattiesburg, Mississippi

Dear Mr. Upthegrove:

The property associated with the former Gulf States Creosoting facility in Hattiesburg, Mississippi, has been environmentally affected by historical use as the site of a wood preserving operation. Environmental Standards, Inc. (Environmental Standards) has calculated risk-based site-specific cleanup standards for a 0.9-acre portion of land located in the northeast corner of the former Gulf States Creosoting facility property. Specifically, the subject property is situated between the back of the Courtesy Ford automobile dealership and adjacent railroad tracks (the "site," Figure 1), and access to the site is limited on three sides by a ditch, a fence, and railroad tracks. The site is an unattractive, overgrown, grassy area of little or no recreational value that was evaluated as Exposure Unit 4 (EU4) in a risk assessment developed in 2001 by Environmental Standards and subsequently approved by the United States Environmental Protection Agency (US EPA) and Mississippi Department of Environmental Quality (MDEQ).

Site-specific cleanup standards were developed for hypothetical maintenance workers, constructions workers, and adolescent trespassers (aged 7 to 16 years) who may have limited access to the site for occupational or recreational purposes. The constituents of potential concern (COPCs) evaluated included acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenz(a,h)anthracene, fluoranthene, fluorene, indeno(1,2,3-cd)pyrene, naphthalene, phenanthrene, and pyrene.

The cleanup standards were calculated based on US EPA and MDEQ guidance and included many of the assumptions used in the US EPA-approved risk assessment developed for the former Gulf States Creosoting site in 2001 (Environmental Standards, 2001). The following table summarizes the exposure assumptions used in each of the exposure models evaluated herein.

Exposure Parameter	Maintenance Worker	Construction Worker	Adolescent Trespasser
Soil ingestion rate (mg/day)	100	480	200
Inhalation rate (m ³ /day)	NA	20	NA
Soil adherence factor	0.038	0.1	0.026
Dermal absorption factor (semivolatiles)	0.1	0.1	0.1
Dermal absorption factor (benzo(a)pyrene)	0.03	0.03	0.03
Exposure frequency (days/year)	12	4	12
Exposure duration (years)	25	1	10
Averaging time (noncarcinogens, days)	9,125	365	3,650
Averaging time (carcinogens, days)	25,550	25,550	25,550
Target hazard quotient	1.0	1.0	1.0
Target cancer risk	1×10 ⁻⁶	1×10 ⁻⁶	1×10 ⁻⁶
Exposed skin surface area (cm ²)	3,000	5,560	3,052
Body weight (kg)	70	70	45

The values presented in the above table were derived from either the 2001 Human Health Risk Assessment report for the site (Environmental Standards, 2001), US EPA Region IV risk assessment guidance (US EPA, 2000), US EPA Region III Risk-Based Concentration Table Technical Background Document (US EPA, 2003), US EPA *Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites* (US EPA, 2002), or MDEQ risk evaluation regulations (MDEQ, 2002). The specific sources of each exposure parameter for each exposure scenario are provided on Tables 1 through 6.

The maintenance worker, construction worker, and adolescent trespasser scenarios were evaluated for dermal and oral exposures to site soil. The construction worker scenario also included potential inhalation exposures to COPCs adsorbed onto fugitive dust.

Toxicity values (oral and inhalation reference doses [RfDs] and cancer slope factors [CSFs]) were extracted from the Oak Ridge National Laboratory (ORNL) Risk Assessment Information System (RAIS) and are current as of 2005. The ORNL RAIS also publishes peer-reviewed, provisional dermal RfDs and CSFs that were used to develop dermal cleanup standards for each scenario. Chronic exposure to maintenance workers and trespassers were evaluated using chronic RfDs while subchronic exposures to construction workers were evaluated using subchronic RfDs. Site-specific cleanup standards could not be calculated for acenaphthylene, benzo(g,h,i)perylene, and phenanthrene due to the lack of published toxicity values for these compounds.

Site-specific cleanup standards were developed based on a carcinogenic risk level of 1×10⁻⁶ for each carcinogen or a hazard quotient of 1.0 for noncarcinogenic effects in accordance with MDEQ regulations (MDEQ, 2002). The algorithms used to calculate the noncarcinogenic effects and carcinogen cleanup standards for each COPC, exposure route, and receptor are presented on Tables 1 through 6. The most restrictive cleanup criterion calculated across each of the exposure pathways for each receptor for either noncarcinogenic or carcinogenic effects was determined to be the site-specific cleanup standard for the area in question. The site-specific cleanup standards are summarized on Table 7.

References

Environmental Standards. 2001. Human Health Risk Assessment for the Former Gulf States Creosoting Facility, Hattiesburg, Mississippi. Valley Forge, PA. March 1, 2001.

MDEQ. February 2002. Final Regulations Governing Brownfield Voluntary Cleanup and Redevelopment in Mississippi.

ORNL Risk Assessment Information System (RAIS). Chemical-Specific Toxicity Values. http://risk.lsd.ornl.gov/tox/tox_values.shtml. June 2004.

US EPA. 2000. Supplemental Guidance to RAGS: Region 4 Bulletins, Human Health Risk Assessment Bulletins. EPA Region 4, originally published November 1995, Website version last updated May 2000:
<http://www.epa.gov/region4/waste/oftecser/healthbul.htm>.]

US EPA. December 2002. Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites. Office of Solid Waste and Emergency Response. OSWER 9355.4-24. Washington D.C.

US EPA. April 2003. Region III. Risk-Based Concentration Table Technical Background Document. Office of RCRA Technical & Program Support Branch. Philadelphia, PA.

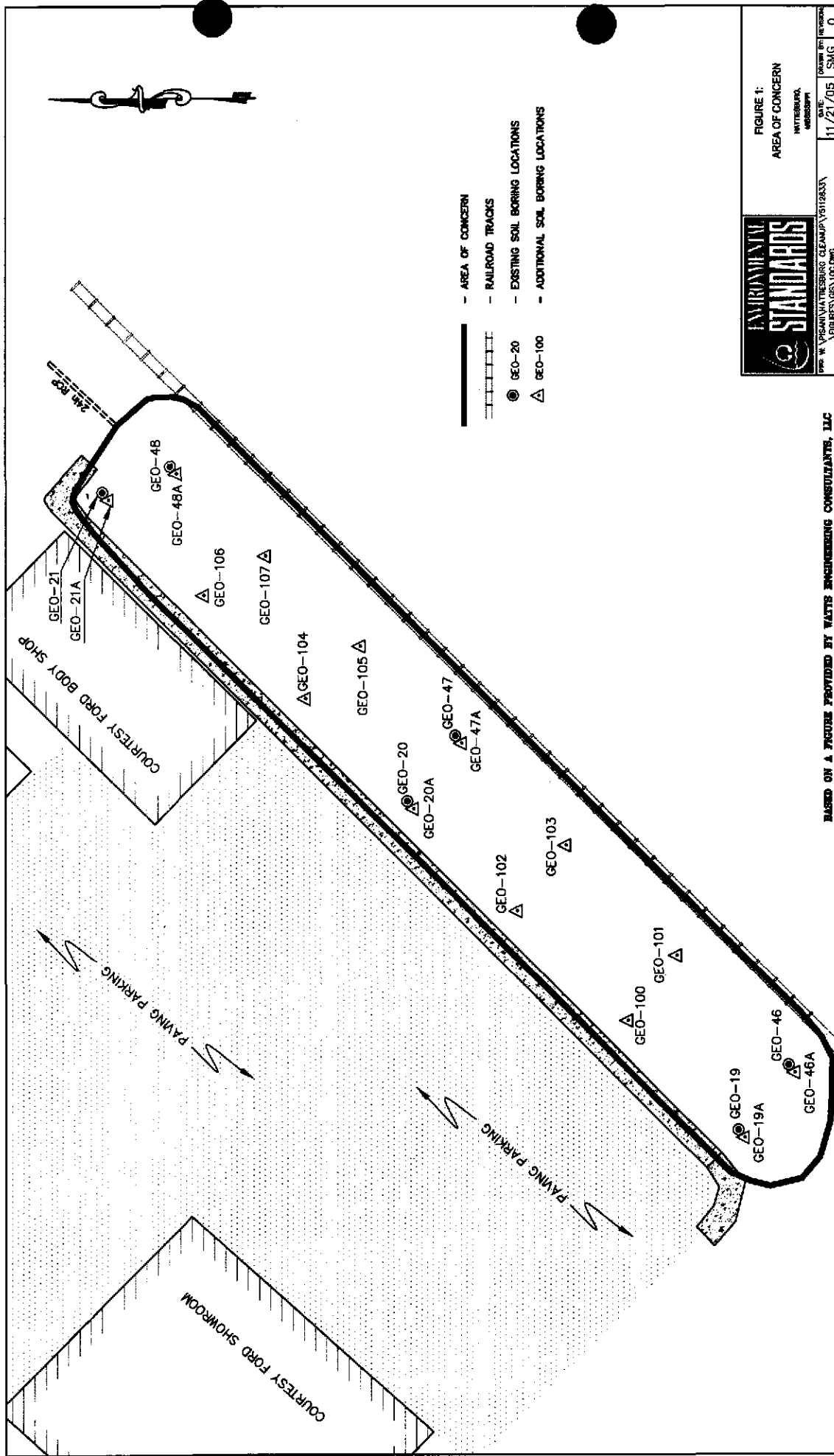
Feel free to contact me if you have any questions regarding the information presented above. I can be reached by phone at 610-935-5577 or by email at kzvarick@envstd.com.

Sincerely,



Kathy Zvarick, M.S.
Manager
Toxicology and Risk Assessment

KAZ\
Attachments



- AREA OF CONCERN
- RAILROAD TRACKS
- EXISTING SOIL BORING LOCATIONS
- ADDITIONAL SOIL BORING LOCATIONS



FIGURE 1:
AREA OF CONCERN

WATERBURY,
MASSACHUSETTS

DATE: 11/21/05
SCALE: AS SHOWN

BASED ON A FIGURE PROVIDED BY WATTS ENGINEERING CONSULTANTS, LLC

PREPARED BY: WATTS ENGINEERING CONSULTANTS, LLC
PROJECT NO.: WEC-05-001

Table 1
Site-Specific Soil Standards for the Maintenance Worker - Noncarcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$C_{s_{nc}} = \frac{THQ \cdot BW \cdot AT_n}{(EF \cdot ED) \cdot ((1/RfD_{cd}) \cdot SA \cdot ABS \cdot AH \cdot CF) + (IngR \cdot (1/RfD_{co}) \cdot CF)}$			
$C_{s_{nc}}$ - Site-Specific Soil Standard - noncarcinogenic effects =	mg/kg	chemical specific	
THQ - Target hazard quotient =	unitless	1.00	MDEQ, 2002
BW - Body weight =	kg	70	US EPA 1995, Region IV
AT_n - Averaging time - noncarcinogenic =	days	9125	US EPA 2005, Region III
EF - Exposure frequency =	days/year	12	reasonable maximum
ED - Exposure duration =	years	25	US EPA 1995, Region IV
RfD_{cd} - Dermal Chronic RfD =	mg/kg-day	chemical specific	see below
ABS_{bap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001
AH - Adherence factor =	mg/cm ²	0.038	ESI, 2001
SA - Surface area available for exposure =	cm ²	3000	ESI, 2001
CF - Conversion factor =	kg/mg	1.00E-06	
IngR - Ingestion rate =	mg/day	100	US EPA 2005, Region III
RfD_{co} - Oral chronic RfD =	mg/kg-day	chemical specific	see below

Constituent	Site-Specific Soil Standard - Noncarc. mg/kg	Dermal Chronic RfD mg/kg-day	Oral Chronic RfD mg/kg-day
Semivolatiles			
Acenaphthene	3.44E+06	1.86E-02	6.00E-02
Acenaphthylene	NA	NA	NA
Anthracene	4.17E+07	2.28E-01	3.00E-01
Benzo(a)anthracene	NA	NA	NA
Benzo(a)pyrene	NA	NA	NA
Benzo(b)fluoranthene	NA	NA	NA
Benzo(g,h,i)perylene	NA	NA	NA
Benzo(k)fluoranthene	NA	NA	NA
Chrysene	NA	NA	NA
Dibenzo(a,h)anthracene	NA	NA	NA
Fluoranthene	2.30E+06	0.0124	4.00E-02
Fluorene	3.68E+06	0.02	4.00E-02
Indeno(1,2,3-cd)pyrene	NA	NA	NA
Naphthalene	2.92E+06	0.016	2.00E-02
Phenanthrene	NA	NA	NA
Pyrene	1.72E+06	0.0093	3.00E-02

NA - Not Available

Table 2
Site-Specific Soil Standards for a Maintenance Worker - Carcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$Cs_c = \frac{TR \cdot BW \cdot AT_c}{(EF \cdot ED) \cdot ((CSF_d \cdot SA \cdot ABS \cdot AH \cdot CF) + (CSF_o \cdot IngR \cdot CF))}$			
Cs_c - Site-Specific Soil Standard - carcinogenic effects =	mg/kg	chemical specific	
TR - Target risk level =	unitless	1.00E-06	MDEQ, 2002
BW - Body weight =	kg	70	US EPA 1995, Region IV
AT_c - Averaging time - carcinogenic =	days	25550	US EPA 2005, Region III
EF - Exposure frequency =	days/year	12	reasonable maximum
ED - Exposure duration =	years	25	US EPA 1995, Region IV
CSF_d - Dermal cancer slope factor =	1/(mg/kg-day)	chemical specific	see below
SA - Surface area available for exposure =	cm ²	3000	ESI, 2001
ABS_{bap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001
AH - Adherence factor =	mg/cm ²	0.038	ESI, 2001
CF - Conversion factor =	kg/mg	1.00E-06	
CSF_o - Oral cancer slope factor =	1/(mg/kg-day)	chemical specific	see below
IngR - Ingestion rate =	mg/day	100	US EPA 2005, Region III

Constituent	Site-Specific Soil Standard - Carc. mg/kg	Dermal Cancer Slope Factor 1/(mg/kg-day)	Oral Cancer Slope Factor 1/(mg/kg-day)
Semivolatiles			
Benzo(a)anthracene	2.21E+02	2.35E+00	7.30E-01
Benzo(a)pyrene	7.20E+01	2.35E+01	7.30E+00
Benzo(b)fluoranthene	2.21E+02	2.35E+00	7.30E-01
Benzo(k)fluoranthene	2.21E+03	2.35E-01	7.30E-02
Chrysene	2.21E+04	2.35E-02	7.30E-03
Dibenzo(a,h)anthracene	2.21E+01	2.35E+01	7.30E+00
Indeno(1,2,3-cd)pyrene	2.21E+02	2.35E+00	7.30E-01

Table 3
Site-Specific Soil Standards for the Construction Worker - Noncarcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$C_{s,nc} = \frac{THQ \cdot BW \cdot AT_n}{(EF \cdot ED) \cdot \left(\left(\frac{1}{RfD_{dco}} \right) \cdot SA \cdot ABS \cdot AH \cdot CF \right) + \left(\left(\frac{1}{RfD_{iocl}} \right) \cdot InhR \cdot \left(\frac{1}{PEF} \right) \right) + \left(IngR \cdot \left(\frac{1}{RfD_{oco}} \right) \cdot CF \right)}$				
$C_{s,nc}$ - Site-Specific Soil Standard - noncarcinogenic effects =	mg/kg	chemical specific	see below	
THQ - Target hazard quotient =	unitless	1	MDEQ, 2002	
BW - Body weight =	kg	70	US EPA 1995, Region IV	
AT_n - Averaging time - noncarcinogenic =	days	365	US EPA 2005, Region III	
EF - Exposure frequency =	days/year	4	reasonable maximum	
ED - Exposure duration =	years	1	US EPA 1995, Region IV	
RfD_{dco} - Dermal chronic RfD =	mg/kg-day	chemical specific	see below	
ABS_{bap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001	
ABS_{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001	
AH - Adherence factor =	mg/cm ²	0.1	ESI, 2001	
SA - Surface area available for exposure =	cm ²	5560	ESI, 2001	
CF - Conversion factor =	kg/mg	1.00E-06		
RfD_{iocl} - Inhalation chronic RfD =	mg/kg-day	chemical specific	see below	
InhR - Inhalation rate =	m ³ /day	20	US EPA 1995, Region IV	
PEF - Particulate emission factor =	m ³ /kg	1.36E+09	US EPA 2002, SSL	
IngR - Ingestion rate =	mg/day	480	US EPA 2005, Region III	
RfD_{oco} - Oral chronic RfD =	mg/kg-day	chemical specific	see below	

Constituent	Site-Specific Soil Standard - Noncarc. mg/kg	Dermal Subchronic RfD mg/kg-day	Oral Subchronic RfD mg/kg-day	Inhalation Subchronic RfD mg/kg-day
Semivolatiles				
Acenaphthene	5.81E+06	1.86E-01	6.00E-01	NA
Acenaphthylene	NA	NA	NA	NA
Anthracene	3.46E+07	2.28E+00	3.00E+00	NA
Benzo(a)anthracene	NA	NA	NA	NA
Benzo(a)pyrene	NA	NA	NA	NA
Benzo(b)fluoranthene	NA	NA	NA	NA
Benzo(g,h,i)perylene	NA	NA	NA	NA
Benzo(k)fluoranthene	NA	NA	NA	NA
Chrysene	NA	NA	NA	NA
Dibenzo(a,h)anthracene	NA	NA	NA	NA
Fluoranthene	3.88E+06	1.24E-01	4.00E-01	NA
Fluorene	4.32E+06	2.00E-01	4.00E-01	NA
Indeno(1,2,3-cd)pyrene	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA
Phenanthrene	NA	NA	NA	NA
Pyrene	2.91E+06	9.30E-02	3.00E-01	NA

NA - Not Available

Table 4
Site-Specific Soil Standards for a Construction Worker - Carcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$Cs_c = \frac{TR \cdot BW \cdot AT_c}{(EF \cdot ED) \cdot ((CSF_d \cdot SA \cdot ABS \cdot AH \cdot CF) + (CSF_i \cdot InhR \cdot (1/PEF)) + (CSF_o \cdot IngR \cdot CF))}$				
Cs _c - Site-Specific Soil Standard - carcinogenic effects =	mg/kg	chemical specific	see below	
TR - Target risk level =	unitless	1.00E-06	MDEQ, 2002	
BW - Body weight =	kg	70	US EPA 1995, Region IV	
AT _c - Averaging time - carcinogenic =	days	25550	US EPA 2005, Region III	
EF - Exposure frequency =	days/year	4	reasonable maximum	
ED - Exposure duration =	years	1	US EPA 1995, Region IV	
CSF _d - Dermal cancer slope factor =	1/(mg/kg-day)	chemical specific	see below	
SA - Surface area available for exposure =	cm ²	5560	ESI, 2001	
ABS _{baP} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001	
ABS _{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001	
AH - Adherence factor =	mg/cm ²	0.1	ESI, 2001	
CF - Conversion factor =	kg/mg	1.00E-06		
CSF _o - Oral cancer slope factor =	1/(mg/kg-day)	chemical specific	see below	
IngR - Ingestion rate =	mg/day	480	US EPA 2005, Region III	
PEF - Particulate emission factor =	m ³ /kg	1.36E+09	US EPA 2002, SSL	
CSF _i - Inhalation cancer slope factor =	1/(mg/kg-day)	chemical specific	see below	
Inhalation rate =	m ³ /shift	20	US EPA 1995, Region IV	
Constituent	Site-Specific Soil Standard - Carc. mg/kg	Dermal Cancer Slope Factor 1/(mg/kg-day)	Oral Cancer Slope Factor 1/(mg/kg-day)	Inhalation Cancer Slope Factor 1/(mg/kg-day)
Semivolatiles				
Benzo(a)anthracene	2.05E+03	2.35E+00	7.30E-01	3.08E-01
Benzo(a)pyrene	3.53E+02	2.35E+01	7.30E+00	3.08E+00
Benzo(b)fluoranthene	2.05E+03	2.35E+00	7.30E-01	3.08E-01
Benzo(k)fluoranthene	2.05E+04	2.35E-01	7.30E-02	3.08E-02
Chrysene	2.05E+05	2.35E-02	7.30E-03	3.08E-03
Dibenzo(a,h)anthracene	2.05E+02	2.35E+01	7.30E+00	3.08E+00
Indeno(1,2,3-cd)pyrene	2.05E+03	2.35E+00	7.30E-01	3.08E-01

Table 5
Site-Specific Soil Standards for the Trespasser - Noncarcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$Cs_{nc} = \frac{THQ \cdot BW \cdot AT_n}{(EF \cdot ED) \cdot ((1/RfD_{cd}) \cdot SA \cdot ABS \cdot AH \cdot CF) + (IngR \cdot (1/RfD_{oc}) \cdot CF)}$			
Cs _{nc} - Site-Specific Soil Standard - noncarcinogenic effects =	mg/kg	chemical specific	see below
THQ - Target hazard quotient =	unitless	1	MDEQ, 2002
BW - Body weight =	kg	45	US EPA 1995, Region IV
AT _n - Averaging time - noncarcinogenic =	days	3650	US EPA 2005, Region III
EF - Exposure frequency =	days/year	12	reasonable maximum
ED - Exposure duration =	years	10	US EPA 1995, Region IV
RfD _{cd} - Dermal Chronic RfD =	mg/kg-day	chemical specific	see below
ABS _{bap} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001
ABS _{pah} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001
AH - Adherence factor =	mg/cm ²	0.026	ESI, 2001
SA - Surface area available for exposure =	cm ²	3052	ESI, 2001
CF - Conversion factor =	kg/mg	1.00E-06	
IngR - Ingestion rate =	mg/day	100	ESI, 2001
RfD _{oc} - Oral chronic RfD =	mg/kg-day	chemical specific	see below

Constituent	Site-Specific Soil Standard - Noncarc. mg/kg	Dermal Chronic RfD mg/kg-day	Oral Chronic RfD mg/kg-day
Semivolatiles			
Acenaphthene	6.54E+05	1.86E-02	6.00E-02
Acenaphthylene	NA	NA	NA
Anthracene	3.72E+06	2.28E-01	3.00E-01
Benzo(a)anthracene	NA	NA	NA
Benzo(a)pyrene	NA	NA	NA
Benzo(b)fluoranthene	NA	NA	NA
Benzo(g,h,i)perylene	NA	NA	NA
Benzo(k)fluoranthene	NA	NA	NA
Chrysene	NA	NA	NA
Dibenzo(a,h)anthracene	NA	NA	NA
Fluoranthene	4.36E+05	1.24E-02	4.00E-02
Fluorene	4.73E+05	2.00E-02	4.00E-02
Indeno(1,2,3-cd)pyrene	NA	NA	NA
Naphthalene	2.49E+05	1.60E-02	2.00E-02
Phenanthrene	NA	NA	NA
Pyrene	3.27E+05	9.30E-03	3.00E-02

NA - Not Available

Table 6
Site-Specific Soil Standards for a Trespasser - Carcinogenic Effects
Former Gulf States Creosoting Facility, Hattiesburg, MS

$Cs_c = \frac{TR \cdot BW \cdot AT_c}{(EF \cdot ED) \cdot ((CSF_d \cdot SA \cdot ABS \cdot AH \cdot CF) + (CSF_o \cdot IngR \cdot CF))}$			
Cs _c - Site-Specific Soil Standard - carcinogenic effects =	mg/kg	chemical specific	see below
TR - Target risk level =	unitless	1.00E-06	MDEQ, 2002
BW - Body weight =	kg	45	US EPA 1995, Region IV
AT _c - Averaging time - carcinogenic =	days	25550	US EPA 2005, Region III
EF - Exposure frequency =	days/year	12	reasonable maximum
ED - Exposure duration =	years	10	US EPA 1995, Region IV
CSF _d - Dermal cancer slope factor =	1/(mg/kg-day)	chemical specific	see below
SA - Surface area available for exposure =	cm ²	3052	ESI, 2001
ABS _{baP} - Dermal absorption factor (benzo(a)pyrene) =	unitless	0.03	ESI, 2001
ABS _{ph} - Dermal absorption factor (semivolatiles) =	unitless	0.1	ESI, 2001
AH - Adherence factor =	mg/cm ²	0.026	ESI, 2001
CF - Conversion factor =	kg/mg	1.00E-06	
CSF _o - Oral cancer slope factor =	1/(mg/kg-day)	chemical specific	see below
IngR - Ingestion rate =	mg/day	100	ESI, 2001
Constituent	Site-Specific Soil Standard - Carc. mg/kg	Dermal Cancer Slope Factor 1/(mg/kg-day)	Oral Cancer Slope Factor 1/(mg/kg-day)
Semivolatiles			
Benzo(a)anthracene	4.98E+02	2.35E+00	7.30E-01
Benzo(a)pyrene	1.54E+02	2.35E+01	7.30E+00
Benzo(b)fluoranthene	4.98E+02	2.35E+00	7.30E-01
Benzo(k)fluoranthene	4.98E+03	2.35E-01	7.30E-02
Chrysene	4.98E+04	2.35E-02	7.30E-03
Dibenzo(a,h)anthracene	4.98E+01	2.35E+01	7.30E+00
Indeno(1,2,3-cd)pyrene	4.98E+02	2.35E+00	7.30E-01

Table 7
Summary of Site-Specific Cleanup Standards
Former Gulf States Creosoting Facility, Hattiesburg, MS

Constituent	Construction Worker		Maintenance Worker		Trespasser		Most Restrictive Cleanup Standard
	Noncarcinogenic Effects	Carcinogenic Effects	Noncarcinogenic Effects	Carcinogenic Effects	Noncarcinogenic Effects	Carcinogenic Effects	
Acenaphthene	5.81E+06	NA	3.44E+06	NA	6.54E+05	NA	6.54E+05
Acenaphthylene	NA	NA	NA	NA	NA	NA	NA
Anthracene	3.46E+07	NA	4.17E+07	NA	3.72E+06	NA	3.72E+06
Benzo(a)anthracene	NA	2.05E+03	NA	2.21E+02	NA	4.98E+02	2.21E+02
Benzo(a)pyrene	NA	3.53E+02	NA	7.20E+01	NA	1.54E+02	7.20E+01
Benzo(b)fluoranthene	NA	2.05E+03	NA	2.21E+02	NA	4.98E+02	2.21E+02
Benzo(g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	NA	2.05E+04	NA	2.21E+03	NA	4.98E+03	2.21E+03
Chrysene	NA	2.05E+05	NA	2.21E+04	NA	4.98E+04	2.21E+04
Dibenzo(a,h)anthracene	NA	2.05E+02	NA	2.21E+01	NA	4.98E+01	2.21E+01
Fluoranthene	3.88E+06	NA	2.30E+06	NA	4.36E+05	NA	4.36E+05
Fluorene	4.32E+06	NA	3.68E+06	NA	4.73E+05	NA	4.73E+05
Indeno(1,2,3-cd)pyrene	NA	2.05E+03	NA	2.21E+02	NA	4.98E+02	2.21E+02
Naphthalene	NA	NA	2.92E+06	NA	2.49E+05	NA	2.49E+05
Phenanthrene	NA	NA	NA	NA	NA	NA	NA
Pyrene	2.91E+06	NA	1.72E+06	NA	3.27E+05	NA	3.27E+05

All values are in mg/kg

FILE COPY

MICHAEL PISANI & ASSOCIATES, INC.

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November 23, 2005

Mr. Tony Russell
Assessment Remediation Branch
MDEQ Office of Pollution Control
101 Capitol Centre
101 W. Capitol Street
Jackson, MS 39201

Re: *Addendum to Soil Sampling and Analysis Plan*
Area between Courtesy Ford and Norfolk Southern Railroad
Hattiesburg, Mississippi

Dear Mr. Russell:

On November 17, 2005, Tronox LLC submitted for MDEQ review a *Soil Sampling and Analysis Plan* for the referenced area. MDEQ commented on the plan in a letter dated November 18, 2005. MDEQ comments and Tronox responses are as follows:

- 1. Due to the distance from Courtesy Ford to the railroad tracks (approximately 100 feet), MDEQ believes that additional sampling locations should be added. The locations (refer to attached drawing) should be centered along a line parallel to the railroad, which would add six (6) additional sample locations.**

Tronox will advance borings and collect soil samples at the additional locations requested by MDEQ. We have revised the attached figure to reflect the additional boring locations (GEO-108 through GEO-113).

- 2. The proposed sampling depth is limited to three (3) feet. MDEQ evaluates human exposure from the surface to six (6) feet below ground surface. Some of the previous data showed contamination at depths deeper than three (3) feet. Therefore, based on any obvious contamination observed during the investigation, it would prudent to collect samples deeper than the proposed three (3) feet.**

Borings will initially be advanced to a depth of 4 feet below land surface (i.e., the length of the sampling barrel). If "obvious contamination" (e.g., staining or odors) is present at the base of the 0 to 4-foot depth interval, borings will be advanced an additional 2 feet, to a depth of 6 feet bls. If no staining or odors are encountered between the depths of 3 and 6 feet bls, no samples will be collected from that interval. However, should soils exhibiting staining or odors be encountered between 3 and 6 feet below grade, soil samples from the contaminated intervals will also be collected and analyzed for PAHs.

3. Supply appropriate sample containers for MDEQ split samples.

We will coordinate with MDEQ prior to sampling to determine the approximate number of split samples to be collected by MDEQ, and will provide sufficient additional sampling containers for MDEQ splits.

We plan to conduct sampling on December 12 and 13, 2005, assuming Tronox and Norfolk Southern can reach a site access agreement. We will contact you during the week of December 5 to confirm the sampling schedule.

Sincerely,

MICHAEL PISANI & ASSOCIATES, INC.

David C. Upthegrove, P.G.

cc: Jerry Banks – MDEQ
Keith Watson – Tronox
T.L. Cabbage - Tronox
Jane Raiford – Adams and Reese



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

November 18, 2005

FILE COPY

Mr. Dave Upthegrove, P.G.
Michael Pisani & Associates, Inc.
13313 Southwest Freeway
Suite 221
Sugar Land, TX 77478

Re: Gulf States Creosote Site
Soil Sampling and Analysis Plan dated November 17, 2005
Hattiesburg, Mississippi

Dear Mr. Upthegrove:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed your letter dated November 17, 2005, regarding a sampling plan for the area between Courtesy Ford and the Norfolk Southern Railroad. MDEQ approval of the proposed scope of work is contingent on incorporation of the following comments:

1. Due to the distance from Courtesy Ford to the railroad tracks (approximately 100 feet), MDEQ believes that additional sampling locations should be added. The locations (refer to attached drawing) should be centered along a line parallel to the railroad, which would add six (6) additional sample locations.
2. The proposed sampling depth is limited to three (3) feet. MDEQ evaluates human exposure from the surface to six (6) feet below ground surface. Some of the previous data showed contamination at depths deeper than three (3) feet. Therefore, based on any obvious contamination observed during the investigation, it would prudent to collect samples deeper than the proposed three (3) feet.
3. Supply appropriate sample containers for MDEQ split samples.

OFFICE OF POLLUTION CONTROL

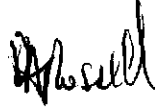
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AN EQUAL OPPORTUNITY EMPLOYER

Mr. Dave Upthegrove
November 18, 2005
Page 2

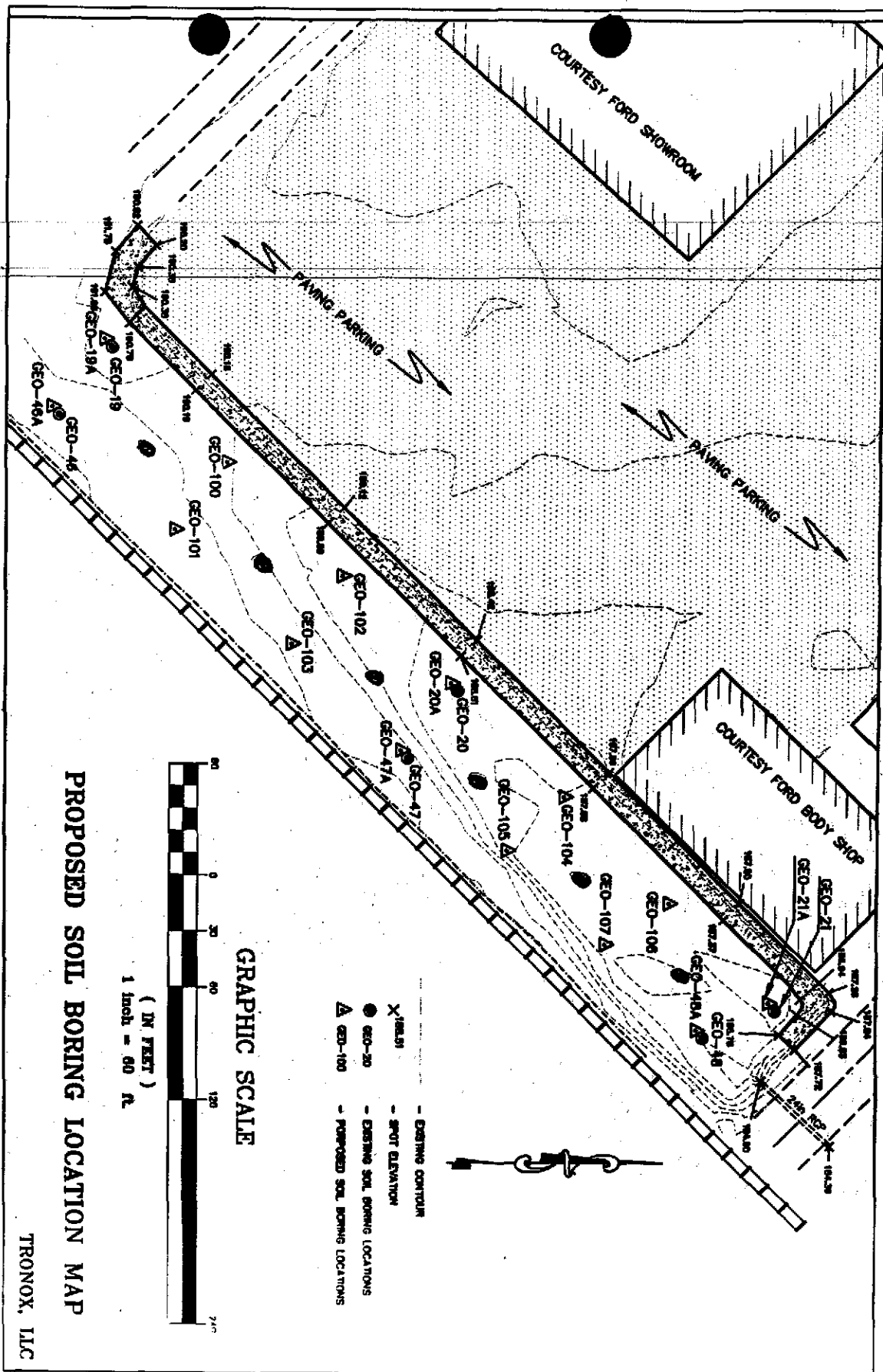
Please call me at 601-961-5318 with any questions you may have.

Sincerely,



Tony Russell, Chief
Assessment Remediation Branch

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November 17, 2005

Mr. Tony Russell
Assessment Remediation Branch
MDEQ Office of Pollution Control
101 Capitol Centre
101 W. Capitol Street
Jackson, MS 39201

Re: *Soil Sampling and Analysis Plan*
Area between Courtesy Ford and Norfolk Southern Railroad
Hattiesburg, Mississippi

Dear Mr. Russell:

Thank you for meeting with representatives of Tronox LLC (formerly Kerr-McGee Chemical LLC) last week to discuss remedial options for the referenced area. At our meeting, Tronox, Norfolk Southern Railroad and MDEQ agreed in principle to a remedy that would entail the removal of soils in the zero to three-foot depth interval to site-specific, risk-based cleanup levels (to be determined). The excavated areas would then be backfilled with clean compacted soils.

Environmental Standards, Inc., a firm specializing in human health risk assessment, is currently developing site-specific, risk-based cleanup levels, which we will submit for MDEQ review and approval under separate cover. The risk-based cleanup standards will be based upon reasonable exposure scenarios for construction workers, maintenance workers and site trespassers. Tronox is submitting this *Soil Sampling and Analysis Plan* in advance of the risk assessment addendum in hopes of expediting our sampling program. We hope to mobilize to the field during the week of December 5, 2005.

Project Background

During Remedial Investigation (RI) activities, six borings were advanced in the area between Courtesy Ford and the Norfolk Southern railroad tracks. Borings GEO-19, GEO-20 and GEO-21 were advanced on the property owned by the State of Mississippi and/or

the Hattiesburg School District; borings GEO-46, GEO-47 and GEO-48 were advanced on a Norfolk Southern right-of-way. A review of the data from these borings indicates that the highest concentrations of polycyclic aromatic hydrocarbons (PAHs) were reported in samples from the uppermost one foot of soil immediately adjacent to the now paved drainage ditch.

Based on the distribution of PAHs in soils, along with concerns voiced by Norfolk Southern regarding the installation and maintenance of a liner system, Tronox has proposed limited removal of soils to reduce potential human health risks to acceptable levels. The sampling program described herein will allow for more accurate delineation of the lateral and vertical extent of elevated PAHs in soils.

Proposed Soil Sampling Program

Soil borings will be advanced using direct-push technology (e.g., a Geoprobe or similar rig) at the 14 locations shown on the attached figure. The sampling locations shown are approximate and may be modified in the field based on topography, as MDEQ has agreed that sampling locations up the slope of the railroad berm is not necessary. Borings will be advanced at the six previously-sampled locations because: 1) samples were last collected at these locations between three and five years ago; and 2) portions of the area were disturbed during the remediation of the former earthen ditch and construction of the concrete-lined ditch. Samples will be collected in stainless steel sampling barrels lined with dedicated plastic sleeves. Sample barrels will be driven to a depth of 3 feet below existing grade at each of the 14 locations shown on the attached figure.

Upon removal from the barrels, liners will be cut lengthwise and the soil core will be placed on clean, heavy-duty aluminum foil. Samples will be collected from the zero to one-foot, one- to two-foot, and two- to three-foot depth intervals, and will be placed immediately into clean, laboratory-supplied sample containers. The containers will be labeled and placed on ice in insulated coolers. Properly completed chain-of-custody forms will accompany the samples from collection through laboratory analysis.

Upon completion of sampling, all boreholes will be filled with bentonite chips, which will then be hydrated with potable water. All boring locations will be surveyed by a professional land surveyor licensed in the State of Mississippi.

Laboratory Analysis

All samples from the zero to one-foot and one- to two-foot depth intervals will be analyzed for PAHs by SW-846 Method 8270. Samples from the two- to three-foot depth interval will be extracted and held for analysis pending the results from shallower samples. The sample from the two- to three-foot interval will not be analyzed at locations where no exceedances of MDEQ-approved site-specific, risk-based cleanup levels are reported in the one- to two-foot sample. However, at locations where constituent

concentrations in the one- to two-foot sample exceed the approved cleanup levels, the two- to three-foot sample will also be analyzed for PAHs by SW-846 Method 8270. In addition, Tronox may elect to conduct environmental forensics analysis of a subset of samples, should the laboratory results using conventional methods (e.g., SW-846 Method 8270) warrant further analysis. Environmental forensics analysis is not planned at this time.

Reporting

Upon receipt and evaluation of laboratory data, Tronox will prepare a report documenting sampling activities and summarizing investigation results. The report will include tabulated data, maps depicting the distribution of PAHs in the various depth intervals, and a comparison to site-specific, risk-based cleanup levels. Laboratory reports will be provided as an attachment to the report. This report, once reviewed and approved by MDEQ, will serve as the basis for a limited soil removal action.

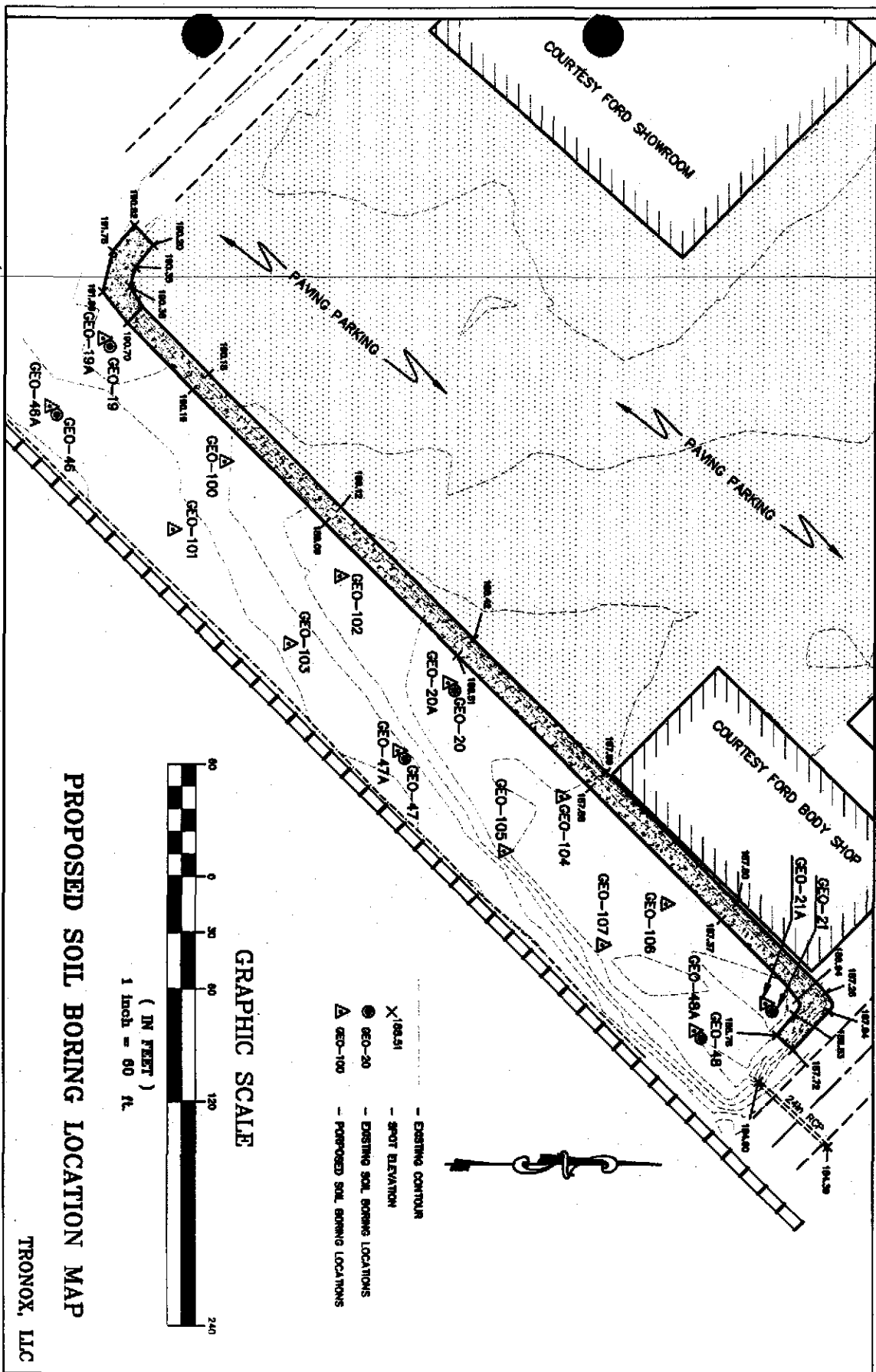
Should you have any questions or wish to discuss our proposed sampling program, please contact us. As Tronox would like to begin sampling within the next several weeks, your rapid review and approval of our proposed sampling program would be greatly appreciated.

Sincerely,

MICHAEL PISANI & ASSOCIATES, INC.

David C. Upthegrove, P.G.

cc: Jerry Banks – MDEQ
Keith Watson – Tronox
T.L. Cabbage - Tronox
Jane Raiford – Adams and Reese



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