

***Deliberative: To Facilitate Conversations between EPA, MDEQ, MDPH, ATSDR and Other Agencies
on Potential Follow-up Actions***

**Summary of Reported Citizen Concerns (Environmental and Public Health) from
Airport Community, Grenada MS**

Rev. 1; 7/21/16

Background: The Airport community is located approximately 1 mile north from the Grenada Stamping facility and the Eastern Heights neighborhood, where the U.S. Environmental Protection Agency (EPA) has been already engaged. This Airport community includes about 35 single family homes on Airport Circle and also about 25 houses and trailers which are in the area (along Kellwood Drive, Highway 332, Air Industrial Park Road and Forked Oak Lane). This community is adjacent to the Airport industrial area, which was formerly home to an Army airfield built in about 1942 for pilot training in World War II and subsequently a municipal airport. Some industry is located in this area.

Preface: The EPA's Resource Conservation and Restoration Division (RCRD) staff first became involved in this Airport community when it received an email from the EPA's Superfund's Emergency Response and Removal Branch. As understood, the Superfund program had originally received a call from a resident in the Airport community who had concerns about illegal dumping. Because RCRD already had a presence within Grenada, RCRD Community Engagement (CE) staff agreed to perform follow-up in the field with the resident. An initial call took place on April 1, 2016 between EPA and the concerned citizen. During that same month, local Grenada City Councilman, Lewis Johnson requested that EPA meet with citizens of Airport Circle during the next field visit to Grenada.

On two separate occasions (April 13, 2016 and May 5, 2016), EPA community engagement staff both from Superfund and RCRD informally met with members of the Airport community to discuss their concerns. In May, CE staff held both a listening session and short tour of the area. This document summarizes the 2.5 hour interview and tour with about five community members held in May, as well as subsequent conversations from residents since then. Residents expressed an array of environmental and public health concerns, such as illegal dumping, industrial practices, and drinking water issues.

This document summarizes the preliminary concerns and issues relayed to EPA from the community to date. For the record, EPA is bound by environmental statutes and regulatory authorities within its jurisdiction; the EPA has resource limitations as well. As such, this paper outlines recommended programs and potential follow-up activities by various agencies that might assist the residents of the Airport community, on behalf of protecting their environment and public health. A parallel effort needs to be undertaken to fact-check and look into reports of concerns from citizens. EPA will encourage continued communications between residents and the proper respective federal/state/local agencies.

EPA kept Mississippi Department of Environmental Quality (MDEQ) staff apprised about dialogue with Airport community residents on April 13, May 5, June 9, and July 8. EPA also informed the MS Department of Public Health (MDPH) officials about the situation on July 7.

The maps of the Airport community with references to surrounding features is attached; as well as photos.

If there any questions, please contact: Brian Holtzclaw (Community Engagement Coordinator) at 404-821-0697 (holtzclaw.brian@epa.gov), Keriema Newman (Outreach Coordinator) at 404-562-8857 (newman.keriema@epa.gov), or Abena Ajanaku (Community Involvement Coordinator) at 404-562-8834 (ajanaku.abena@epa.gov). EPA's main community contact has been Marvin Perry, 662-614-1152 (mpgenesis@yahoo.com), who leads a community group that meets about monthly, called the 'Airport Community Fighting Contamination.'

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1	<p>Allegations of historical illegal dumping of chemicals from the former Rockwell facility (current site of Grenada Manufacturing LLC) in the vicinity of the former concrete plant in the nearby airport industrial area in 1970's. This property is in the Airport industrial area where the community is aware some of the main City of Grenada drinking water well intakes are located. Citizens reported historic dumping on a nearby property called Harrell's Metal Work (before current business), as well as a nearby swale near the Airport Baptist Church. All three areas are between 150 feet and 1 mile away from the subject community. The local impacts on local environment and public health are unknown.</p>	Airport Area	<p>U.S. EPA Superfund program Mississippi Department of Environmental Quality (MDEQ)</p> <ul style="list-style-type: none"> - A need exists to evaluate potential for TCE (or other) contamination in soils, groundwater from illegal dumping. A listening session with residents may yield valuable information to assist any potential investigation. - The community could file a petition for a "Preliminary Assessment (PA)" with the EPA's Superfund Restoration and Site Evaluation Branch. EPA internally can help initiate a PA to attempt to verify the existence of released hazardous substances at a site. The PA's purpose is to determine if a threat exists and what further action should be taken. - EPA's Superfund program and MDEQ need to confer on the roles they may have to respond with respect to the alleged Rockwell facility dumping. - Interviews with residents with knowledge of dumping is recommended - Potentially expand historic aerial photography analysis previously conducted of the Eastern Heights Subdivision and surrounding area, by the EPA's REPA contractor.

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2	<p>Citizen questions of prior uses of Airport community, as well as nearby Military/Commercial/Industrial Property: a) Alleged abandoned and ruptured sewage/waste water line on residential properties¹; b) Implied concern about the prior use of residential property before homes were structurally relocated from the then-future 90,000 acre Grenada Lake tract back in the 1940's; c) Nearby properties with concerns on potential environmental impacts and or spills/releases, include, but are not limited to the Grenada Army Airfield² during the World War II era; the Grenada municipal airport; former Kellwood industry; and a former military bomb hull manufacturer. These properties are</p>	<p>Airport Area</p>	<p>City of Grenada; Water and Sewer Department</p> <p>Army Corps of Engineers (ACOE)</p> <p>Mississippi Department of Environmental Quality (MDEQ)</p> <p>U.S. EPA Superfund – Former Used Defense Sites Program (“FUDS”) Coordinator</p> <p>- Residents conveyed they want to see and understand a map of current and former waste water lines, as well as drinking water lines. They want to know the integrity of these drinking water lines, should the underground soils be contaminated.</p> <p>- Residents desire to know about prior use of their land before structural relocation of the homes in the Airport Circle area.</p>

¹ Homeowners believe that these waste water lines on their property, running from historical operating industries (70-80 years ago) through their neighborhood, have since ruptured and waste water has discharged in their groundwater. They express concerns if this situation can affect their drinking water. According to the homeowners, the lines were possibly directed to the sewage treatment facility just east of neighborhood. One homeowner shared that he recently learned his home waste water line was still hooked up to the historic sewer line during a recent repair, and this was corrected; he conveyed concerns about what's in the groundwater, such as e-coli, etc.

² The local airfield has a rich history, per internet research. Built during 1943 and opened in February 1944, the airport was known as the Grenada Army Airfield during World War II, the United States Army Air Forces Army Air Forces Training Command. The field consisted of three runways - all of which were approximately 5,000 feet (1,500 m) long. By the time the program was completed, fifty C-47 airplanes and 25 CG-4A gliders were brought to Grenada field to be serviced and prepared for use. Troop Carrier Command assigned the 10th and 63rd Troop Carrier Group in 1943-1944 to the airfield. The headquarters unit on the airfield was the 443rd Base Headquarters Squadron. In 1945 Troop Carrier Command moved out and the airfield was turned over to Air Technical Service Command. Initially it was used as a prisoner of war camp, the last POWs being released at the end of 1945. ATSC then used the base for surplus aircraft storage and as a military air freight transshipment point for many years. In 1953 the airfield was turned over to John Mason Boyd (Boyd Construction Company) and became known as the Grenada Municipal Airport. The military has since made improvements to the field and jointly uses it with civil aviation.

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	in close proximity to the community.		<p>- Consider acquiring research on: historic City directories for footprints of former industries; older aerial photography; perhaps leveraging EPA contract resources on looking up industrial history from 1930's on; locate former fuel storage tank facilities (above or below-ground) related to local air transportation; and historic environmental assessment/cleanup activities on airport area properties.</p> <p>- ACOE may have records on historic structure relocation of houses and be able to provide to residents what if any due diligence was done to assess property conditions before houses were structurally placed on their current property.</p> <p>- Evaluate the status of the former Army Airfield area as to placement on the "Formerly Used Defense Sites (FUDS)" Program, which targets assessment/and possible response actions of environmental contamination at properties formerly owned, leased, possessed, or used by the military services (Army, etc.). Determine whether any assessments or cleanups were done historically; convey to residents how environmental regulations are being used to protect them at the current airport.</p>
3	Potential environmental impacts from nearby operating industrial facilities which include: Luvata company ³ (Commercial Coil and	Luvata – Commercial Coil, 1000	Mississippi Department of Environmental Quality (MDEQ)

³ EPA researched Luvata. A. Luvata's Commercial Coil property is about 100 feet from the nearest residence. On EPA ECHO's database, located at <https://echo.epa.gov>, indicated that it has these environmental regulations in effect: Clean Air Act (CAA): Operating Synthetic Minor (MS0000002804300030), Clean Water Act (CWA): Minor, Permit Effective (MSP090730), and the Resource Conservation and Recovery Act (RCRA): Active (H) SQG (MSD985967595). Per ECHO, the last CAA inspection was 2011 and the last RCRA inspection was in 2012. The

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	Aluminum Product in Airport area), the Bowater Newsprint South Inc. facility ⁴ , and the Advanced Distributor Products known as ADP ⁵ (2 buildings). Other companies nearby include: W C Plastics and Harrels Metal Works. ⁶	Heatcraft Drive, Grenada, MA 38901	- Consider a listening session to speak to residents about their concerns with respect to operations of local facilities and other matters. Consider educating residents on MDEQ's programs. Evaluate extent/adequacy of current environmental

firm reports to EPA's Toxic Release Inventory and the last significant year was in 2006, when they released 255 lbs/year of chromium to the air. They are listed with an NAIC industrial code of machinery manufacturing. The last CAA on-site inspection was 4/23/15, the last RCRA on-site inspection was 9/11/2012, and the last CWA on-site inspection is not noted for the past 5 years. B. Luvata's Aluminum Products is about 250 feet from the nearest residence. EPA ECHO's database reports it has this environmental regulation in effect: Clean Air Act (CAA): Operating Synthetic Minor (MS0000002804300038). The state's last on-site inspection for CAA was 4/17/2013. Some residents who know Luvata workers are aware that MDEQ and OSHA regulate matters such as operations and labelling, and if something is wrong they provide time to correct, or else they assert processes will be shut down.

⁴ EPA researched that the Bowater Newsprint South Inc. facility (also registered as the Resolute Forest Products US Inc. on EPA databases) operates at 1000 Papermill Road, Grenada, MS 38901; their website stated they employ 156 persons and produce 246,000 metric tons of newsprint annually; this facility is about 1.3 miles away from the Airport community, which is the closest residential community near this plant. The facility conducts Toxic Release Inventory (TRI) reporting. EPA's ECHO database indicated that it has these environmental regulations in effect: it handles hazardous waste (under RCRA); has permits to discharge to water (major and minor NPDES permits) and has reported air releases under the Clean Air Act (air pollution is regulated under SIP, PSD, NESHAP, NSDS, MACT and Title V). The last on-site inspections were as follows: CAA (7/10/12, 7/31/14 and 4/26/16) and CWA (5/29/14); EPA's Envirofacts database lists +40 air pollutants; the 13 top TRI chemicals are the following: Dioxin and Dioxin-Like Compounds, Mercury, Manganese Compounds, Methanol, Nitrate Compounds, Zinc Compounds, Lead Compounds, N-Butyl Alcohol, Ammonia, Acetaldehyde, Sulfuric Acid, Chlorine, Nitrotriacetic Acid. It was noted that their 2014 TRI reporting states that 54,048 lbs of TRI chemicals are released to the air and 108,739 are released to the surface water (likely nearby Riverdale Creek).

⁵ EPA researched ADP, or Advanced Distributor Products (Parent Company is Lennox International Inc.); two facilities are indicated in the local area. The primary ADP facility, at 1995 Air Industrial Park Road, Grenada, MS 38901, is on EPA's ECHO database and it stated it has these environmental regulations in effect: Clean Air Act (CAA): Operating Major (MS0000002804300031); Clean Water Act (CWA): Minor, Permit Effective ([MSP091229](#)); Resource Conservation and Recovery Act (RCRA): Active (H) CESQG (MSR000001461); Safe Drinking Water Act (SDWA): No Information. In ECHO, the last CAA on-site inspection was in 7/30/2012, last RCRA inspection was in 2001, and no CWA on-site inspections noted in the past 5 years. It was noted the firm was "in violation" in the first quarter of 2015 for the CWA. The facility was cited with a CAA notice of violation on 10/15/2012. The main facility is about 1 mile to the northwest from the subject community.

⁶ Per EPA's ECHO database, these 2 companies are regulated by MDEQ under RCRA (both W C Plastics, at 280 Air Industrial Park and Harrels Metal Works at 1798 Highway 332, have a conditionally exempt small quantity

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	<p>Note that all are within 1.3 miles away from the subject community. Some assertions were made to spills and/or discharges of TCE from the Luvata facility.⁷ Also resident concerns were made as to an unidentified truck allegedly disposing of waste at different locations in course of 2 years; particular truck seen parked at Grenada Manufacturing LLC before. Concerns were shared of overflowing of Riverdale Creek near their neighborhood, a creek which is said to accept some industry discharges. Residents complained of air pollution from the nearby Bowater South Newsprint paper mill.</p> <p>Concern was expressed about what OSHA is doing to protect workers.</p>	<p>Luvata – Aluminum Products – (LAL) 823A Air Industrial Park Road, Grenada, MS 38901</p> <p>Luvata – 3984 Highway 51 S, Grenada, MS 38901</p> <p>ADP – 2 buildings; one is at 1995 Air Industrial Park Road, Grenada, MS 38901</p>	<p>permits, inspections, the facility's enforcement/compliance track record, determine if any facilities are in the Voluntary Cleanup Program (VCP), acquire emissions information from permits, Toxic Release Inventory/etc., ask if fence-line air monitoring has occurred (because of air complaints from neighborhood). Attain community input and report back to the community on findings, and any next steps, as applicable.</p> <p>- Research the concerns about Riverdale Creek overflows, talk to residents, current or former workers about TCE spills and operations; inquire as to the unknown truck waste disposal reports from residents. Follow-up as needed in accordance to statutory and regulatory authorities.</p> <p>OSHA – Encourage OSHA to share with residents an update on their activities in the local area.</p>

generator, "CESQG" status of < 220 lbs hazardous wastes/month or 2.2 lbs/month of acute haz. waste/month or 220 lbs of spill residue/month.)

⁷ Information from residents indicated that at the nearby Luvata – Commercial Coil plant, it had an indoor below-ground TCE tank (size of mid-size car, about 20 foot deep) that reportedly had a leak for 5 years into the environment until it was subsequently reportedly shut down by MDEQ. The community was concerned about any resultant groundwater contamination and what kind of assessment/cleanup work was undertaken during or after this determination; they understood the TCE vat process was closed and was filled in with concrete. Also they expressed concerns that they understood that during the time of the TCE operation (estimated prior to 2005), that spills and an overflow pipe piped externally appeared to have been discharged to city sewer and/or into the ditch culverts on-site. Claims were made about a considerable amount of dumping and spills. One resident relayed they heard that an internally posted Luvata sign reportedly states, "Do not break ground unless you call MDEQ"; and was concerned about what that means. The community shared a concern that up until this time, Luvata and/or the MDEQ have not yet had any community meetings on their operations and local environmental issues. As an aside, for the South Grenada Luvata plant location (not this Luvata – Commercial Coils location), it was reported to EPA that back in the 1980's, a 40 foot tanker truck filled with TCE was accidentally punctured by a fork lift and 1,000's of gallons were released into the parking lot. This particular Luvata facility is adjacent to the former Kopper's wood treatment facility, where EPA has a regulatory role in managing groundwater contamination.

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		Bowater South Newsprint Facility is at 1000 Papermill Road, Grenada, MS 38901	
4	<p>Drinking water concerns with residential neighborhood. Complaints include at times a strong chlorine and a very unpleasant odor, brown water running out of the faucets, dark used filters, and adverse health impacts (e.g., see issue #5). Residents appear frustrated they do not trust the water for drinking and have to spend their hard-earned money for bottled water. They report the shower/bath water causes ailments such as skin breakouts, itching, and rashes. Several stated, their un-written rule is "do not drink the water."</p> <p>Reportedly in the past year and a half, 2 local firms (ADP and Luvata) near the Airport community temporarily took their water fountains off-line and provided bottled water to employees. Reportedly, this switch-over happened near the time a fiber optic cable firm allegedly broke the water line in three locations between Eastern Heights community and the Airport community. The community felt the companies were notified, but they said they belatedly learned</p>	Residents in the Airport community	<p>MS State Department of Health – Bureau of Public Water Supply (MSDH-BPWS)</p> <p>City of Grenada: Water and Sewer Department</p> <ul style="list-style-type: none"> - Encourage listening session with MSDH-BPWS, the Grenada Water/Sewer Departments and residents on health issues and water quality, consider tap water testing, share plans (if any) about improvements on storm-water control, answering citizen's concerns, improving relationships, consider increasing frequency of drinking water well testing, as appropriate. - Look into assuring residents of proper environmental closure of the reported waste water facility. Share with residents maps of current and historic waste water lines, drinking water lines, and the safety of the drinking water sources; not having this knowledge appears to be causing distress.

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	<p>about this and did not get any advisories at the time. The firms apparently continue to supply bottled water to workers.</p> <p>Concerns were made about the disparity in the drainage and storm-water management system currently in the Airport community, as compared to recent investments in Eastern Heights community. Shared complaints about ditches and yards having standing water at times.</p> <p>Concerns were made as to the reported former waste water treatment facility (about 1 mile due east from the target community). Concerns were made on the unknowns about past and present drinking water sources, as well as waste water lines and their respective spatial locations.</p> <p>Residents expressed concerns about potential environmental impact from various facilities (current and historic) and potential harm from the drinking water intakes for Grenada in the airport industrial area (EPA is aware these are that are situated 500-800 below ground in a deep aquifer).</p>		
5	<p>Health Concerns. Skin rashes among adults and children, as well as other health concerns (e.g., range of dermatological issues – at times disabling, gastrointestinal issues, respiratory problems/infections, headaches, thyroid issues, blood clotting disorders, miscarriages,</p>	<p>Adult and children residents within Airport community</p>	<p>MS State Department of Health (MSDH) Agency for Toxic Substances and Disease Registry (ATSDR); this is part of Centers for Disease Control, CDC PEHSU (Pediatric Environmental Health Specialty Unit)</p>

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	<p>etc.). Residents reported general fears of higher morbidity (diseases) and mortality (death) rates.</p> <p>Citizens shared observations of sick and dead animals (pet dogs, birds, etc.). One resident told of his concerns with eating deer that was hunted near the woods of Bowater paper mill (ate ~ 4-5 deer/year for ~ 16 years) near the waste water ponds (reportedly not-fenced) – many a deer had black tumors in its rib cage; now the person will not hunt because of concerns about deer having chemical exposure. The residents complained the local doctors are not knowledgeable about health impacts and potential environmental exposures.</p> <p>Also stories were told from adults in their youth playing in the storm-water ditches near the north end of the now Grenada Mfg LLC facility in the late 1970s to 1980's; there was reportedly no fencing and at least one child had seizures that the residents believe are attributable to this activity.</p>		<ul style="list-style-type: none"> - Encourage a health-related listening session with residents to directly understand their health concerns and assess possible tools the agencies above might have. - As appropriate, EPA may coordinate with the EPA Children's Environmental Health (CEH) program (Wayne Garfinkel); evaluate providing PEHSU services to provide clinical advisement to resident's children. - Share contact information of relevant health-related agencies. Also, as appropriate, encourage residents to direct any health questions from the resident's physician to the MS Poison Control Center (University of Mississippi Medical Center) at: www.umc.edu/Administration/Outreach_Services/Mississippi_Poison_Control_Center/Patient_Referral_and_Consult_Service.aspx; and their main contact, Dr. Robert Cox, Medical Toxicologist, (601) 984-5577. - Inquire about how ecological risks are being managed at the Bowater paper mill, which may indirectly affect human health.

ATTACHMENT #1:

MAP



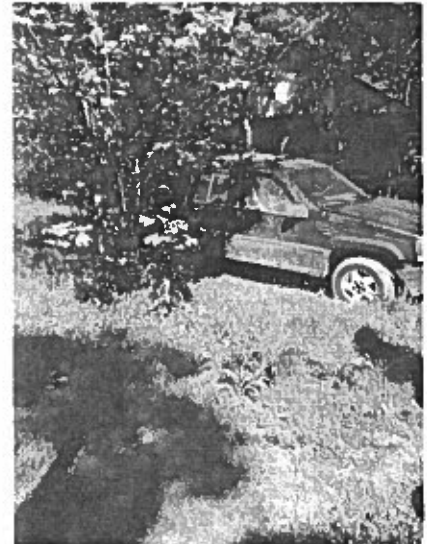
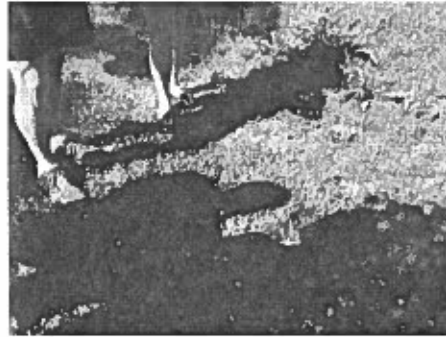
ATTACHMENT #2:

TRIP PHOTOS

Photo: Issue # 1, Allegation of Illegal Dumping, Photo of Former Concrete Plant in airport industrial are, where alleged historic dumping from Rockwell (site of current Grenada Manufacturing LLC) in the 1970's occurred



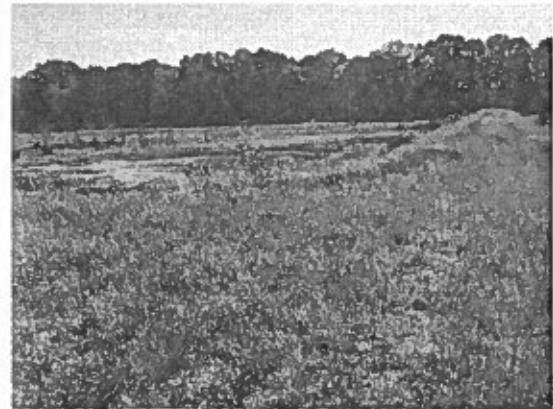
Photos: Issue #2, Citizen Questions of Prior Uses of Airport Circle and local area, Photos of yard at 124 Airport Circle with depressed area from suspected collapsed waste water line.



Photos: Issue #3, Potential environmental impacts from nearby operating facilities, photo of one Luvata facility close to the Airport community.



Photos: Issue # 4, Drinking Water Concerns, photos of reported former waste water treatment facility (~ 1 mile east from subject community) and photos of a used water filter from an Airport community residence.



Photos: Issue #5, Health Concerns; sample of 31 total photos sent in from residents about skin rashes of children and adults.

