FACT SHEET

FOR A PERMIT UNDER THE
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
LOCATED AT

CAVENHAM FOREST INDUSTRIES
GULFPORT, MISSISSIPPI
USEPA ID. NO. MSD 057 226 961
PERMIT NO. HW057226961

Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, Mississippi 39289-0385
Telephone No. (601) 961-5171
Permit Writer: William Rider
Date: April 15, 2022

This fact sheet is prepared pursuant to Mississippi Hazardous Waste Management Regulations (MHWMR) Rule 1.24 Part 124.8 for the draft Permit Number HW057226961 developed by the Mississippi Department of Environmental Quality (MDEQ) for Cavenham Forest Industries, Inc.

Background:

The Cavenham Forest Industries (CFI) Gulfport facility is located at 9502 Creosote Road in Gulfport, Mississippi. The approximately 73.6 acre former wood treating plant site is located east of Creosote Road and is situated between the Harrison County Industrial Seaway to the north, and Turkey Creek and Rippy Road to the south. Wood treating operations at the site commenced in about 1906 with the production of creosote treated timbers, pilings, poles and crossties. Several years later, the plant became Gulfport Creosoting Company and specialized in the production of utility poles. For many years, creosote was the only material used for treating, but in the mid-1960's, the facility began to use pentachlorophenol as a preservative, and for the remainder of the facility's operating life, both creosote and pentachlorophenol were utilized as preservatives. For the first 50 or more years, there were no environmental laws or regulations governing the operation of the facility. In 1972, Crown Zellerbach Corporation acquired the Gulfport Creosoting Company and continued the wood treating operation using both creosote and pentachlorophenol. In 1986, Cavenham Forest Industries acquired Crown Zellerbach.

In 1987, Cavenham began closure of the RCRA regulated surface impoundment and related units. However, the hazardous waste remaining in the surface impoundment and associated units was not removed. The remaining sludge is the listed hazardous waste number K001, described as "bottom sediment sludge from the treatment of

wastewaters from wood preserving processes that use creosote and/or pentachlorophenol". The remaining sludge was stabilized by mixing with fly ash, and the units were covered by a protective cap. The cap includes a sheet of 40-mil thickness PVC, followed by a layer of compacted clay three feet in thickness. The north and east sides of the cap are protected from damage by water/wave action by rip rap to an elevation of 15 feet. The remaining surface of the cap is covered with 12 inches of top soil that has been seeded to establish vegetative cover to help prevent erosion.

In preparation for the RCRA permitting process, the facility was required to investigate soil and groundwater contamination at the site. In order to determine the extent of contamination at the site, in excess of 140 wells have been installed at the facility. Based on the sampling of soils and groundwater from these wells, a corrective action program was developed.

Presently, all hazardous waste management units are closed and the wood treating manufacturing facility has been demolished. The facility is comprised of a lab/office building, the closed RCRA unit, and associated groundwater remediation system. The groundwater remediation system serves both the closed RCRA units and the solid waste management units (SWMUs) identified in the Hazardous and Solid Waste Act (HSWA) portion of the RCRA Permit for this facility.

Site Permitting

In 1976, the U.S. Congress enacted the Resource Conservation and Recovery Act (RCRA), which initiated the regulation of the management and disposal of hazardous wastes. The authority to carry out the provisions of RCRA have been delegated to MDEQ. RCRA was amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), which included the authority to address releases of hazardous waste or hazardous constituents from any solid waste management unit at the regulated facility, regardless of the age of the unit. Simply put, if the current owner or a previous owner has created a solid waste management unit by the dumping or disposal of a waste material, regardless of when the dumping occurred, the unit must be investigated and remediated, if necessary. However, the state of Mississippi is not authorized to carry out this portion of HSWA, therefore Region 4 of the United States Environmental Protection Agency continues to be the permitting authority for these old areas of contamination that were created prior to 1976.

MDEQ issued the initial RCRA permit to Cavenham in 1988. The permit was reissued on 1996, and re-issuance is planned for 2007. The current RCRA permit issued by MDEQ, and the draft RCRA renewal permit, contain the following key requirements:

- Continuation of the approved groundwater remediation plan
- Collection and analysis of groundwater samples from 13 selected wells to gauge the effectiveness of the remediation program in removing contamination and preventing the migration of contamination.
- Inspection and maintenance of the cap on the closed impoundment, the site security system, the groundwater wells, and the wastewater treatment system.

- Maintaining financial assurance to provide for the continuation of permit requirements in the event the Permittee is unable to do so.

The initial NPDES wastewater discharge permit to discharge treated groundwater was issued in 1989. This permit has been reissued and currently set to expire March 31, 2026.The NPDES permit contains limits on the pH (weekly sampling), Biochemical Oxygen Demand, dissolved oxygen (weekly sampling), oil & grease, pentachlorophenol, and total phenols. Samples are taken twice per month, except for those parameters indicated for weekly samples. The results are reported each month to MDEQ.

Groundwater Remediation

As would be suspected, the operation of a wood treating facility at the site for over 100 years, with no environmental laws or regulations in force for many of those years, resulted in significant contamination of soils and groundwater at the site by wood treating chemicals. The facility developed a plan to keep the contaminated groundwater from spreading, and to remove the contaminants from the aquifer. In order to aid in the objective of preventing migration of contaminated groundwater, soil-bentonite cutoff walls were installed in 1989. One of the cutoff walls completely surrounds the "old pond" unit on the western side of the property, while the other surrounds the former manufacturing and wastewater treatment area. The cut off walls prevent the outward migration of contaminated groundwater, while a naturally occurring layer of clay present under the site prevents the downward migration of contamination. To remove the contamination from the groundwater, the facility installed a "pump and treat" system, where the contaminated groundwater is pumped to the surface for treatment to remove the hazardous chemicals. The pumping of groundwater from within the areas encircled by the cut-off walls also aids in the prevention of further migration of contamination, since the pumping has the effect of lowering the water level in the area enclosed by the walls. In this manner a gradient is created which would result in groundwater flowing inward through any leaks in the wall, rather than the contaminated groundwater flowing outward through the wall.

Approximately 36 wells are used to recover contaminated groundwater. Some of these wells produce not only water containing dissolved wood treating chemical constituents, but also "free product", which consists of the wood treating chemicals in a relatively concentrated state. All of the material pumped from the recovery wells is treated to separate the "free product" from the groundwater, and the groundwater is further treated to remove the dissolved contaminants. Biological treatment is the primary treatment process, followed by activated carbon treatment and aeration to produce an effluent suitable for discharge in accordance with the NPDES wastewater permit.

Cavenham has added additional features to the basic "pump and treat" system to enhance the remediation process. A portion of the treated groundwater is re-introduced below the ground surface to help flush the remaining contamination into the recovery wells.

Since start-up of the groundwater remediation system, over 66 million gallons of contaminated groundwater have been recovered and treated, and over 353,600 gallons

of product have been removed recovered and either shipped off-site for reclamation or consumed onsite in a thermophilic biological reactor. However, it is expected to take many more years of remediation to complete the clean-up process. Creosote is a syrup-like chemical that is heavier than water, and relatively insoluble in water. These properties make it difficult to recover the chemical from the sand, silt and clay found in the subsurface environment.

Site Monitoring Activities

Each month the facility samples and analyzes the treated wastewater being discharged to the Harrison County Industrial Seaway. Samples are analyzed for oil & grease, pH, dissolved oxygen, pentachlorophenol, biochemical oxygen demand, and total phenols. Total flow is continuously recorded. The testing results are reported to MDEQ monthly.

The facility also samples the groundwater from 13 monitoring wells and analyzes the samples for wood treating constituents that are known to be present in the groundwater. Samples are taken twice per year, and the results are reported to MDEQ. The groundwater sampling data is used to evaluate the effectiveness of the ongoing remediation process, and also monitor the plume of contamination to confirm that the plume of contamination is not migrating or spreading off-site.

Operations at the site are also monitored by MDEQ. Inspectors visit the site at least once per year to evaluate the facility's compliance with all regulations and permit requirements. MDEQ also periodically conducts sampling of the wastewater discharge to verify the quality of the discharge to the Industrial Seaway. Other MDEQ specialists in groundwater testing periodically observe the collection of groundwater samples, and may also split groundwater samples for analysis by MDEQ's laboratory, and the results are compared to the results obtained by the facility.

Financial Requirements

In accordance with MHWMR Rule 1.7 Part 264.145 and Part 264.151, Cavenham is required to provide adequate Financial Assurance to cover the costs of post-closure care of all RCRA regulated units. In April 2007, Cavenham Forest Industries, Inc. provided MDEQ with a post-closure cost estimate. Performance Bond No. 929600927 was executed on January 22, 2015 for $2,018,000 to meet its RCRA financial assurance requirements for post-closure care. See Post Closure Cost Estimate in the table at the end of this document for an updated estimate of post-closure costs.

Procedures for Permit Issuance

As described in the public notice, persons interested in commenting on this permit should submit written comments by mail or email to:

William Rider
Mississippi Department of Environmental Quality
PO Box 2261
Jackson, Mississippi 39225
wrider@mdeq.ms.gov

This permit will be issued in conformance with Parts 124 and 270 of the Mississippi Hazardous Waste Management Regulations. There will be a 45-day comment period in accordance with the regulations. All comments received will be entered into the record and will be considered by the Permit Board before a decision is made to either issue or deny the permit. Public participation in the permit process is encouraged. For additional information, please contact William Rider at 601-961-5184 or wrider@mdeq.ms.gov.

Permit Process

The purpose of the permitting process is to afford MDEQ and interested citizens the opportunity to evaluate the ability of the Permittee to comply with the applicable requirements promulgated under the Resource Conservation and Recovery Act (RCRA). The permit conditions are set forth in one concise permit document that describes all statutory requirements of RCRA with which this facility must comply during the duration of the permit.

Permit Structure

The permit is divided into six parts: A cover sheet setting forth the basic legal authority for issuing the permit; a section on standard conditions applicable to all hazardous waste management permits (Module I); a section on standard conditions applicable to all hazardous waste management facilities (Module II); a section establishing requirements for post-closure care of the closed hazardous waste surface impoundments (Module III); a section establishing requirements for a groundwater detection monitoring system for the closed hazardous waste surface impound (Module IV); a section addressing corrective action for regulated units (Module V);a section addressing applicable land disposal restrictions (Module VI); a section addressing applicable organic air emissions (Module VII); and a section addressing waste minimization (Module VIII).

The permit also includes attachments incorporating information taken from the application that expand on permit requirements.

BASIS FOR DRAFT PERMIT CONDITIONS

The following section is a summary of the basis for the conditions in the permit. This discussion is organized such that the reviewer can cross-reference conditions of the permit to the section.

PERMIT CONDITIONS

Cover Page

Activity	**Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1**	**Permit Condition**
Permit Authority	Rule 1.23 Part 124	Cover Page
Permit Duration	Rule 1.16 Part 260 Rule 1.2 Part 261 Rule 1.7 Part 264 Rule 1.15 Part 268 Rule 1.16 Part 270	Cover Page

MODULE I

Module I of the permit sets forth standard administrative conditions applicable to all hazardous waste management permits. Unless otherwise specified, all citations refer to the regulations as codified in Mississippi Hazardous Waste Management Regulations (MHWMR).

Activity	**Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1**	**Permit Condition**
Effect of Permit	Rule 1.16 Part 270.4 Rule 1.16 Part 270.30(g)	I.A.
Permit Actions	Rule 1.16 Part 270.30(b) Rule 1.16 Part 270.30(f) Rule 1.16 Part 270.41 Rule 1.16 Part 270.42 Rule 1.16 Part 270.43 Rule 1.16 Part 270.50(d)	I.B.
Severability	Rule 1.23 Part 124.16	I.C.
Definitions	Rule 1.23 Part 124 Rule 1.1 Part 260 Rule 1.2 Part 261 Rule 1.7 Part 264 Rule 1.16 Part 270 Miss. Code Ann. § 49-2-13	I.D.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Duties and Requirements		I.E
Duty to Comply	Rule 1.16 Part 270.30(a)	I.E.1.
Duty to Reapply	Rule 1.16 Part 270.10(h) Rule 1.16 Part 270.30(b)	I.E.2.
Permit Expiration	Rule 1.16 Part 270.50 Rule 1.16 Part 270.51	I.E.3.
Need to Halt or Reduce Activity	Rule 1.16 Part 270.30(c)	I.E.4.
Duty to Mitigate	Rule 1.16 Part 270.30(d)	I.E.5.
Proper Operation and Maintenance	Rule 1.16 Part 270.30(e)	I.E.6.
Duty to Provide Information	Rule 1.16 Part 270.30(h)	I.E.7.
Inspection and Entry	Rule 1.16 Part 270.30(i)	I.E.8.
Monitoring and Records	Rule 1.16 Part 270. 30(j)	I.E.9.
Reporting Planned Changes	Rule 1.16 Part 270.30(l)(1)	I.E.10.
Anticipated Noncompliance	Rule 1.16 Part 270.30(l)(2)	I.E.11.
Transfer of Permit	Rule 1.16 Part 270.30(l)(3) Rule 1.7 Part 264.12(c) Rule 1.16 Part 270.40	I.E.12.
Twenty-four Hour Reporting	Rule 1.16 Part 270.30(l)(6)	I.E.13.
Other Noncompliance	Rule 1.16 Part 270.30(l)(10)	I.E.14.
Obligation for Corrective Action	Rule 1.7 Part 264.100(f)	I.E.15.
Other Information	Rule 1.16 Part 270.30(l)(11)	I.E.16.
Signatory Requirement	Rule 1.16 Part 270.11 Rule 1.16 Part 270.30(k)	I.F.
Reports, Notifications, And Submissions to the Executive Director	Rule 1.7 Part 264 Rule 1.16 Part 270.31	I.G.
Confidential Information	Rule 1.16 Part 270.12 Miss Code 49-17-39	I.H.
Permit Review Period	Rule 1.16 Part 270.50(d)	I.I.
Documents to be Maintained	Rule 1.7 Part 264.15(b)(2)-General Inspections Requirements Rule 1.7 Part 264.73-	I.J.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
	Operating Record Rule 1.7 Part 264.118(a)-Post-Closure Plan Rule 1.7 Part 264.144(d)-Cost Estimate for Post-Closure Part 264.145-Financial Assurance for Post-Closure	

MODULE II

Module II of the permit sets forth the specific conditions for this facility with which the Permittee must comply.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Facility Description	Rule 1.16 Part 270.14(b)(1)	II.A. Attachment B
Design and Operation	Rule 1.7 Part 264.31	II.B.
Required Notices	Rule 1.7 Part 264.12	II.C.
Hazardous Waste Imports	Rule 1.7 Part 264.12(a)	II.C.1.
Hazardous Waste From Off-Site Sources	Rule 1.7 Part 264.12(b)	II.C.2.
Transfer of Permit	Rule 1.7 Part 264.12(c)	II.C.3.
Security	Rule 1.7 Part 264.14	II.D. Attachment F
General Inspections Requirements	Rule 1.7 Part 264.15	II.E. Attachment F
General Waste Analysis	Rule 1.16 Part 264.13(a)	II.F.
Special Conditions	Rule 1.16 Part 270.32	II.G.
Location Standards	Rule 1.7 Part 264.18	II.H.
General Post-Closure Requirements	Rule 1.7 Part 264 Subpart G	II.I. Attachment C
Post-Closure Care Period	Rule 1.7 Part 264.117	II.I.1.
Amendment to Post-Closure Plan	Rule 1.7 Part 264.118(d)	II.I2.
Certification of Completion	Rule 1.7 Part 264.120	II.I3.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
of Post-Closure Care		
Financial Requirements	Rule 1.7 Part 264 Subpart H	II.J. Attachment C
Cost Estimate for Post-Closure	Rule 1.7 Part 264.144(a) Rule 1.7 Part 264.144(c) Rule 1.7 Part 264.144(d)	II.J.1
Financial Assurance for Facility Post-Closure	Rule 1.7 Part 264.145	II.J.2
Incapacity of Owners or Operators, Guarantors, or Financial Institutions	Rule 1.7 264.148	II.J.3
Operating Record	Rule 1.7 Part 264.73	II.L.
Annual Report	Rule 1.8	II.M.

MODULE III

Module III of this permit sets forth requirements in accordance with MHWMR 264 Subpart G for the post-closure care of the closed hazardous waste landfill and closed wastewater lagoons.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Applicability	Rule 1.7 Part 264.110	III.A.
Post-Closure Procedures And Use of Property	Rule 1.7 Part 264 Subpart G & Subpart K	III.B.
Post-Closure Care Period	Rule 1.7 Part 264.117(a)(1) & (2)	III.B.1.
Post-Closure Care	Rule 1.7 Part 264.228(b)	III.B.2. Attachment C Attachment F
Security	Rule 1.7 Part 264.117(b)	III.B.3. Attachment F
Integrity of Final Cover	Rule 1.7 Part 264.117(c)	III.B.4.
Post-Closure Plan	Rule 1.7 Part 264.117(d)	III.B.5. Attachment C
Retention of Post-Closure Plan	Rule 1.7 Part 264.118(b) and (c)	III.B.6.
Inspections	Rule 1.7 Part 264.117	III.C.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Notices and Certification	Rule 1.7 Part 264 Subpart G	III.D.
Post-Closure Notices	Rule 1.7 Part 264.119(c)	III.D.1.
Post-Closure Permit Modifications	Rule 1.7 Part 264.118(d)	III.D.2
Certification of Completion of Post-Closure Care	Rule 1.7 Part 264.120	III.D.3.
Financial Assurance	Rule 1.7 Part 264 Subpart H	III.E.

MODULE IV

Module IV. Of this permit sets forth the requirements in accordance with MHWMR 264 Subpart F for groundwater monitoring for the closed surface impoundment. Due to the releases that have occurred, this is a corrective action/compliance monitoring program.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Applicability	Rule 1.7 Part 264.90	IV.A.
Monitoring Program	Rule 1.7 Part 264.91(a)(3) Rule 1.7 Part 264.96(c)	IV.B.
Groundwater Protection Standards	Rule 1.7 Part 264.92 Rule 1.7 Part 294.94(b)	IV.C.
Constituents/Concentration Limits	Rule 1.7 Part 264.93 Rule 1.7 Part 264.94	IV.D.
Point of Compliance	Rule 1.7 Part 264.95	IV.E.
Compliance Period	Rule 1.7 Part 264.96	IV.F.
Groundwater Monitoring Program	Rule 1.7 Part 264.100	IV.G. Attachment D
Groundwater Monitoring System	Rule 1.7 Part 264.97	IV.H. Attachment D
Well Replacement	Rule 1.7 Part 264.97	IV.H.1.
Compliance Monitoring Wells	Rule 1.7 Part 264.97(a)	IV.H.2.
Corrective Action "Effectiveness" Monitoring Wells	Rule 1.7 Part 264.97(a)	IV.H.3.
Background Monitoring Wells	Rule 1.7 Part 264.97(a)	IV.H.4.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Boundary Control Monitoring Wells	Rule 1.7 Part 264.97(a)	IV.H.5.
Additional Monitoring Wells	Rule 1.7 Part 264.97(a)	IV.H.6
Groundwater Monitoring Requirements	Rule 1.7 Part 264.99	IV.I.
Monitoring Requirements Table IV-1	Rule 1.7 Part 264.99(a) Rule 1.7 Part 264.99(f) Rule 1.7 Part 264.99(g)	IV.I.1.
Dioxin Investigation		IV.I.2.
Additional Parameters	Rule 1.7 Part 264.99(g)	IV.I.3.
Sampling and Analysis Procedures, Evaluation, and Reporting	Rule 1.7 Part 264.97(d) Rule 1.7 Part 264.97(e)	IV.J. Attachment D
Elevation of the Groundwater Surface	Rule 1.7 Part 264.97(f)	IV.K.
Statistical Procedure	Rule 1.7 Part 264.97(h)	IV.L.
Monitoring Program and Data Evaluation	Rule 1.7 Part 264.99	IV.M.
Reporting and Recordkeeping	Rule 1.7 Part 264.73(b)(6) Rule 1.7 Part 264.100(g) Rule 1.7 Part 264.99(h) Rule 1.7 Part 264.99(g)	IV.N.
Assurance of Compliance	Rule 1.7 Part 264.99 Rule 1.7 Part 264.100	IV.O.
Special Requirement if the Groundwater Protection Standard is Exceeded	Rule 1.7 Part 264.100(h) Rule 1.7 Part 264.99(i) Rule 1.7 Part 264.100(h)	IV.P.

MODULE V

Module V establishes specific conditions as to how the Permittee will address releases from the former surface impoundment area.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Applicability	Rule 1.7 Part 264.100	
Description of Plan	Rule 1.7 Part 264.100	V.B.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
		Attachment E
Corrective Action Period	Rule 1.7 Part 264.100(f)	V.C.
List of Hazardous Constituents	Rule 1.7 Part 264.100(a)(1)	V.D.
Concentration Limits	Rule 1.7 Part 264.100(a)(2) Rule 1.7 Part 264.100(b)	V.E. V.D.
Arial Extent of Corrective Action	Rule 1.7 Part 264.100(e)	V.F.
Reports	Rule 1.7 Part 264.100(g)	V.G.
Modifications	Rule 1.7 Part 264.100(h)	V.H.

MODULE VI

Module VI of this permit outlines land disposal restrictions in accordance with MHWMR Part 268.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
General Restrictions	Rule 1.15 Part 268	VI.A
Land Disposal Prohibitions And Treatment Standards	Rule 1.15 Part 268 Subpart C, D, & E	VI.B

MODULE VII

Module VII outlines the requirements for organic air emissions from process vents and equipment leaks as contained in MHWMR 264, Subparts AA and BB. The Permittee does not have any equipment or processes subject to these regulations at this time.

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
General Introduction	Rule 1.7 Part 264 and 265 Subparts AA and BB	VII.A

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Organic Air Emission Standards	Rule 1.7 Part 264 Subparts AA, BB, CC	VII.B

MODULE VIII.

This Module outlines the requirements for Waste Minimization in accordance with MHWMR 264.73(b)(9).

Activity	Regulation (MHWMR) 11 Miss Admin Code Pt. 3, Ch. 1	Permit Condition
Module Applicability	Rule 1.7 Part 264.73(b)(9)	IV.A
Waste Minimization Certification Objectives	Rule 1.7 Part 264.73(b)(9)	IV.B [Attachment H]
Recordkeeping and Reporting	Rule 1.8	IV.C

ATTACHMENT A
Attachment A to the permit consists of Part A of the RCRA Hazardous Waste Application.

ATTACHMENT B
Attachment B to the permit contains the facility description with drawings.

ATTACHMENT C
Attachment C to the permit contains the post-closure plan and financial requirements for the facility.

ATTACHMENT D
Attachment D to the permit contains the plan for the continuing sampling and analysis of the groundwater at the facility.

ATTACHMENT E
Attachment E to the permit contains the corrective action plan for the facility.

ATTACHMENT F
Attachment F to the permit contains the schedules and procedures for inspecting the facility and maintaining security.

VARIANCES
The regulations cited above do not provide for variances.

POST CLOSURE COST ESTIMATE **April 23, 2021**
CAVENHAM FOREST INDUSTRIES, LLC - Gulfport, MS

Cost of Post-Closure Care										
LINE ITEM		CORRECTIVE ACTION				NON-CORRECTIVE ACTION				TOTAL
		COST/YR	YEARS	TOTAL		COST/YR	YEARS	TOTAL		
1.0	Removal of Leachate (PC-2)	$0.00	10	$0.00		$0.00	20	$0.00		$0
2.0	Site Security (PC-3)	$500.00	10	$5,000.00		$500.00	20	$10,000.00		$15,000
3.0	Maintenance of Vegetative Cover (PC-4)	$2,880.00	10	$28,800.00		$2,880.00	20	$57,600.00		$86,400
4.0	Maintenance and Inspection (PC-5)									$17,057
5.0	Groundwater Monitoring (PC-6, SA-8, SA-8A)	$23,374.78	10	$233,747.80		$12,586.42	20	$251,728.40		$485,476
6.0	Deed Notation (PC-7)	$0.00	10	$0.00		$0.00	20	$0.00		$0
7.0	Maintenance and Inspection of Asphalt Cover (PC-8)	$0.00	10	$0.00		$0.00	20	$0.00		$0
8.0	Subtotal of Post-Closure Costs (Lines 1-7)									$603,933
9.0	Engineering Expenses (10% of Post Closure Cost)									$60,393
10.0	Certification of Completion of Post-Closure (PC-9)							$4,960.00		$4,960
11.0	Subtotal									$669,286
12.0	Contingency (20% of Subtotal)									$133,857
Total Cost of Post Closure Care Included (PC-1)										**$803,144**
Cost of Post-Closure Care: Maintenance of Groundwater Treatment System										
LINE ITEM		CORRECTIVE ACTION				NON-CORRECTIVE ACTION				TOTAL
		COST/YR	YEARS	TOTAL		COST/YR	YEARS	TOTAL		
13.0	Maintenance of Groundwater Treatment System									
13.1	Site Labor - Half-time employee for operation of the recovery and injection systems and monitoring of the water treatment system during corrective action.	$62,400.00	10	$624,000.00		$0.00	20	$0.00		$624,000
13.2	Operating Expenses - costs other than site labor, including electricity, replacement parts, internal monitoring, and etc.	$30,000.00	10	$300,000.00		$0.00	20	$0.00		$300,000
13.3	Permit Monitoring - Cost of analyzing samples from NPDES outfall.	$5,048.00	10	$50,480.00		$0.00	20	$0.00		$50,480
13.4	Major Maintenance - 5% of 13.1 and 13.2.	$4,620.00	10	$46,200.00		$0.00	20	$0.00		$46,200
13.5	Report/Permitting - Semi-annual reports, renewal of permit applications, etc.	$5,000.00	10	$50,000.00		$0.00	20	$0.00		$50,000
13.6	Contingency 20% of 13.1 through 13.5	$21,413.60	10	$214,136.00		$0.00	20	$0.00		$214,136
	Total Cost for Operation of the Groundwater Corrective Action System									**$1,284,816**

TOTAL COST FOR 30 YEAR POST-CLOSURE PERIOD	**$2,087,960**

Procedures

The State of Mississippi's permit will cover those portions of RCRA for which it has final authorization to administer, and the Federal permit addresses the Hazardous and Solid Waste Amendments of 1984. Together, these permits constitute the RCRA permit for this facility.

The regulations under 40 CFR and MHWMR 124.10 require that a 45-day comment period be instituted for each draft permit under the Resource Conservation and Recovery Act. The comment period will begin on April 15, 2022, which is the date of publication of the public notice in major local newspapers of general circulation and will end on May 30, 2022. A notice regarding the availability of information will also be broadcast over a local radio station. In accordance with state requirements, the public notice will also be posted in the local courthouse and post office.

Persons wishing to comment on the permit or the proposed permit conditions should submit such requests or comments in writing. Comments should be sent to the Mississippi Department of Environmental Quality, ATTENTION: William Rider, Waste Division, at P.O. Box 2261, Jackson, Mississippi 39225 or emailed at WRider@mdeq.ms.gov. Comments must be received no later than the close of business, May 30, 2022.

When MDEQ makes a final permit decision to either issue, deny, or modify the permit, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review is requested under MHWMR 124.19. If no comments requested a substantial change in the draft permit, the final permit shall become effective immediately upon issuance.