

**STATE OF MISSISSIPPI
HAZARDOUS WASTE MANAGEMENT
PERMIT**

THIS CERTIFIES THAT

**Reichhold, Inc. - Gulfport
11015 Reichhold Road
Gulfport, Mississippi
Harrison County
HW-001-661-719
(MSD 001 661 719)**

is hereby authorized to conduct post closure care for two closed Surface Impoundments and a closed Hazardous Waste Tank System.

This permit is issued under the authority of the Mississippi Solid Wastes Disposal Law, and particularly Section 17-17-27 thereof, and rules adopted and promulgated thereunder, all of which authorize the Department of Environmental Quality to enforce all applicable requirements, under the Mississippi Hazardous Waste Management Regulations, and associated conditions included therein.

Permit Issued: AUG 13 2012

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Permit No.: HW-001-661-719

Expires: SEP 11 2022

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MODULE 1 – GENERAL PERMIT CONDITIONS

I.A. EFFECT OF PERMIT

The Permittee is authorized to conduct post-closure care of a closed hazardous waste tank system and two closed surface impoundments (Aeration Pond Nos. 1 and 2) and conduct corrective action for contaminated groundwater resulting from these regulated units, in accordance with the conditions of this permit. Subject to MHWMR 270.4, compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of the Resource Conservation and Recovery Act (RCRA). Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, and invasion of other private rights, or any infringement of state or local law or regulations or preclude compliance with any other Federal, State, and/or local laws. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3008(a), Section 3008 (h), Section 3013, of Section 7003 of RCRA; Sections 106(a), 104 or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA) or any other law providing for protection of public health or the environment.

I.B. PERMIT ACTIONS

Paragraph (f) of MHWMR 270.30 is hereby incorporated by reference.

I.C. SEVERABILITY

The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. [MWHMR 124.16]

I.D. DEFINITIONS

For purposes of this permit, terms used herein shall have the same meaning as those in MHWMR Parts 124, 260, 264, 268 and 270, unless this permit specifically provides otherwise; where terms are not defined in the regulations or the permit, the meaning associated with such terms shall be defined by a standard dictionary or the generally accepted scientific or industrial meaning to the term. “Executive Director” means the Executive Director of the Mississippi Department of Environmental Quality (MDEQ), or his designated or authorized representative.

I.E. DUTIES AND REQUIREMENTS

The duties and requirements in MHWMR 270.30 (a), (b), (c), (d), (e), (g), (h), (i), (j), (l), and (m) are hereby incorporated by reference.

I.E.1. Reapplying for a Permit

If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days prior to permit expiration. [MHWMR 270.10(h)]

I.E.2. Permit Expiration

Pursuant to MHWMR Part 270.50, this permit shall be effective for a fixed term not to exceed ten (10) years. This permit and all conditions herein will remain in effect beyond the permit's expiration date, if the Permittee has submitted a timely, complete application and, through no fault of the Permittee, the Executive Director has not issued a new permit, as set forth in MHWMR 270.51. [MHWMR 270.50(a), MHWMR 270.51(d)]

I.F. SIGNATORY REQUIREMENT

All applications, reports, or information submitted to or requested by the Executive Director shall be signed and certified in accordance with MHWMR 270.11. [MHWMR 270.30(k)]

I.G. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE EXECUTIVE DIRECTOR

All reports, notifications, or other submissions which are required by this permit to be sent to or given to the Executive Director should be sent by certified mail or given to:

Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225

I.H. CONFIDENTIAL INFORMATION

In accordance with MHWMR Part 270.12, the Permittee may claim confidential any information required to be submitted by this permit.

MODULE II – GENERAL FACILITY CONDITIONS

II.A. FACILITY DESCRIPTION

This permit is issued to Reichhold, Inc. for their Gulfport, Mississippi Facility [MSD 001 661 719] as described in the permit renewal application submitted on January 1, 2009, including all subsequently submitted supplementary information and modifications; and hereinafter referred to as “the application.” The extent, or boundaries, of the permitted facility encompass Lot 4 of the surveyed plat in Appendix A.

II.B. DESIGN AND OPERATION OF FACILITY

The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, as required by MHWMR 264.31.

II.C. REQUIRED NOTICES

II.C.1. Hazardous Waste Imports

The Permittee shall not receive hazardous waste from a foreign source.

II.C.2. Hazardous Waste from Off-Site Sources

The Permittee shall not receive hazardous waste from an off-site source.

II.D. SECURITY

The Permittee shall comply with the security provisions of MHWMR Section 264.14(b)(2) by maintaining the existing 7-foot chain link fence around the property and keeping the main gate and any other gates locked at all times except when facility personnel are onsite. The permittee shall keep the signs required by MHWMR 264.14(c) at each entrance to the facility.

II.E. GENERAL INSPECTION REQUIREMENTS

The Permittee shall comply with the inspection requirements of MHWMR Section 264.15 as described in the Post-Closure Plan (Section 1.0) found in Appendix B. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by MHWMR 264.15(c). Records of inspections shall be kept as required by MHWMR 264.15(d).

II.F. LOCATION STANDARD

The facility is not located in an area described by MHWMR 264.18(a). None of the regulated units is located within a 100-year floodplain.

II.G. GENERAL POST-CLOSURE REQUIREMENTS

II.G.1. Post-Closure Care Period

The Permittee shall conduct post-closure care for the hazardous waste tank system and the surface impoundments for 30 years following the date of completion of closure, except as otherwise provided in Module III. Post-closure care of the units shall be in accordance with MHWMR 264.117 and the Post-Closure Plan (Appendix B) required by MHWMR 264.118.

II.G.2. Use of Property

Post-closure use of the property shall be in accordance with the institutional controls (IC) approved as the selected remedy for the site as specified in the permit issued by the U.S. Environmental Protection Agency (EPA) under the authority of the Hazardous and Solid Waste Amendments (HSWA) to the Solid Waste Disposal Act (SWDA) .

II.G.3. Amendment to Post-Closure Plan

The Permittee shall request a permit modification and amend the Post-Closure Plan, whenever necessary, in accordance with MHWMR Section 264.118(d).

II.G.4. Post-Closure Notices

- II.G.4.a. The Permittee has submitted records of the type, location, and quantity of hazardous waste disposed within each cell or disposal unit, in accordance with MHWMR 264.119(a).
- II.G.4.b. Within 60 days of certification of closure of the first hazardous waste disposal unit and within 60 days of certification of closure of the last hazardous waste disposal unit, the Permittee performed the following:
 - i. Recorded a notation on the deed to the facility property, in accordance with MHWMR 264.119(b)(1).
 - ii. Submitted a certification that the notation required by MHWMR 264.119(b)(1) has been recorded, in accordance with MHWMR 264.119(b)(2).

II.G.4.c. The Permittee shall request and obtain a permit modification prior to the post-closure removal of hazardous wastes, hazardous waste residues, liners, or contaminated soils in accordance with MHWMR 264.119(c).

II.H. COST ESTIMATE FOR POST-CLOSURE CARE

II.H.1. The Permittee must have a detailed written estimate of the cost of providing post-closure care of the facility, prepared in accordance with MHWMR 264.144(a).

II.H.2. The Permittee must revise the post-closure cost estimate whenever there is a change in the facility's post-closure plan as required by MHWMR 264.144(c).

II.H.3. The Permittee must keep the latest post-closure cost estimate, as required by MHWMR 264.144(d), at the Reichhold, Inc. central file located in the offices of the Reichhold Site Manager.

II.I. FINANCIAL ASSURANCE FOR POST-CLOSURE CARE

The Permittee shall demonstrate continuous compliance with MHWMR 264.145 by providing documentation of financial assurance in at least the amount of the cost estimate required by Condition II.H. of this permit. However, the amount of financial assurance provided to the MDEQ, as required by MHWMR 264.145, may be reduced if all of the following conditions are met:

- (1) The aggregate amount of financial assurance that would be required under the terms of this permit and the permit issued by the U.S. EPA under the authority of HSWA meets the combined cost estimate approved by the MDEQ per MHWMR 264.144 and approved by the U.S. EPA per 40 CFR 264.101(b). Costs for identical tasks and/or scopes of work required by the two permits shall only be included once in the combined cost estimate.
- (2) Financial assurance is provided to MDEQ in an amount equal to that portion of the combined cost estimate associated with tasks and/or scopes of work required only by this permit.
- (3) Financial assurance mechanisms in an aggregate amount equal to the combined cost estimate shall be in place and effective prior to or concurrently with a reduction to the financial assurance required by this permit.
- (4) Should the U.S. EPA terminate or suspend the requirement to maintain financial assurance under the provisions of HSWA, Reichhold shall provide financial assurance to MDEQ in the amount approved under Condition II.H. prior to, or simultaneously with, the termination of financial assurance provided to the U.S. EPA.

Changes in financial assurance mechanisms must be approved by the Executive Director pursuant to MHWMR Section 264.145.

II.J. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

The Permittee shall comply with MHWMR 264.148 whenever necessary.

II.K. OPERATING RECORD

Pursuant to MHWMR Part 264.73(a), the Permittee must keep a written operating record of post-closure care activities and those activities specified in MHWMR Part 264.73(b)(5) and (6), as well as post-closure cost estimates required by MHWMR 264.73(b)(8). These records shall be maintained at the Reichhold, Inc. central file located in the offices of the Reichhold Site Manager and shall be made available upon request.

II.L. SPECIAL CONDITIONS

II.L.1. Where a discrepancy exists between the wording of an item in the application and this permit, the permit requirements take precedence over the application.

II.L.2 Where a discrepancy exists between the wording of an item in an Appendix and wording in the permit module, the module requirements take precedence over the Appendix.

MODULE III – POST-CLOSURE CARE

III.A. APPLICABILITY

The Permittee shall provide post-closure care for the closed Hazardous Waste Tank System and two closed Surface Impoundments, depicted in Figure 1-3 of Appendix A, in accordance with MHWMR 264.110(b). The closed Hazardous Waste Tank System consisted of two 12,000-gallon above-ground storage (AST) tanks and one 24,000-gallon AST managing hydrocarbon fuel wastes classified as RCRA hazardous wastes for ignitability (D001) and benzene toxicity (D018). The tanks have been removed with only the concrete slab, previously used for secondary containment, remaining. The closed Surface Impoundments consisted of two aeration basins formerly used in the wastewater treatment process that were deemed hazardous waste management units because the wastewater entering the basins had benzene levels exceeding the toxicity characteristic limit (D018). The sludge in the basins was stabilized; then, the basins were capped with a clay layer and vegetated.

III.B. POST-CLOSURE CARE AND USE OF PROPERTY

- III.B.1. Post-closure care for the Surface Impoundments shall extend for thirty (30) years from the certification of complete closure dated June 21, 1993, except as otherwise specified herein. Post-closure care for the Hazardous Waste Tank System shall extend for thirty (30) years from the certification of complete closure dated December 2, 1999, except as otherwise specified herein. The post-closure care period may be shortened upon application and demonstration approved by MDEQ that the facility is secure, or may be extended by MDEQ if the Executive Director or his authorized representative finds this is necessary to protect human health and the environment. [MHWMR 264.117(a)]
- III.B.2. The Permittee shall perform maintenance, monitoring, and reporting for the groundwater monitoring program in accordance with the applicable requirements of Subpart F of MHWMR Part 264 and Module IV of this permit during the post-closure period. [MHWMR 264.117(a)(1)]
- III.B.3. For the Hazardous Waste Tank System, the Permittee shall comply with the post-closure care requirements for tank systems in MHWMR Part 264, Subpart J, by complying with the post-closure care requirements that apply to landfills (MHWMR 264.310), as follows [MHWMR 264.117(a)(1) and 264.197(b)]:

- III.B.3.a. Maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of MHWMR Part 264, Subpart F [MHWMR 264.310(b)(4)] and
- III.B.3.b. Protect and maintain surveyed benchmarks used in complying with MHWMR 264.309. [MHWMR 264.310(b)(6)]
- III.B.3.c. Per MHWMR 264.117(a)(2)(i), MDEQ has determined that post-closure care for the final cover (i.e., the concrete slab) may be discontinued. Therefore, the requirements of MHWMR 264.118(b) regarding the cap and final cover, including the specific requirements in MHWMR 264.310 regarding the final cover, shall no longer apply.
- III.B.4. For the Surface Impoundments, the permittee shall comply with the post-closure care requirements for surface impoundments in MHWMR Part 264, Subpart K, as follows [MHWMR 264.117(a)(1) and MHWMR 264.228(b)]:
 - III.B.4.a. Maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of MHWMR Part 264, Subpart F. [MHWMR 264.228(b)(3)]
 - III.B.4.b. Per MHWMR 264.117(a)(2)(i), MDEQ has determined that post-closure care for the final cover may be discontinued. Therefore, the requirements of MHWMR 264.118(b), including the specific requirements in MHWMR 264.228 regarding the final cover, shall no longer apply.
- III.B.5. The Permittee shall maintain the security measures specified in Condition II.D and shall inspect these security devices as specified in the Post-Closure Plan found in Appendix B. [MHWMR 264.117(b)]
- III.B.6. The Permittee shall implement the Post-Closure Plan found in Appendix B. All post-closure care activities must be conducted in accordance with the provisions of the Post-Closure Plan. [MHWMR 264.117(d)]

III.C. POST-CLOSURE INSPECTIONS

The Permittee shall inspect the components, structures, and equipment at the site in accordance with the Inspection Schedule in Appendix B.

III.D. POST-CLOSURE NOTICES

If the Permittee or any subsequent owner or operator of the land upon which the hazardous waste disposal unit is located, wishes to remove hazardous wastes and hazardous waste residues or contaminated soils, he shall request a modification to this post-closure permit in accordance with the applicable requirements in MHWMR Parts 124 and 270. The Permittee or any subsequent owner or operator of the land shall demonstrate that the removal of hazardous wastes will satisfy the criteria of MHWMR 264.117(c). [MHWMR 264.119(c)]

III.E. CERTIFICATION OF COMPLETION OF POST-CLOSURE CARE

No later than sixty (60) days after completion of the established post-closure care period for each hazardous waste disposal unit, the Permittee shall submit to the Executive Director, by registered mail, a certification that the post-closure care for the hazardous waste disposal unit was performed in accordance with the specifications in the approved Post-Closure Plan. The certification must be signed by the Permittee and qualified, professional engineer registered in the State of Mississippi. Documentation supporting the independent, professional engineer's certification must be furnished to the Executive Director upon request until the Executive Director releases the Permittee from the financial assurance requirements for post-closure care under MHWMR 264.145(i). [MHWMR 264.120]

III.F. RETENTION OF POST-CLOSURE PLAN

The person designated as the facility contact in the Post-Closure Plan (Appendix B) must keep the updated Post-Closure Plan during the remainder of the post-closure period. [MHWMR 264.118(c)]

III.G. POST-CLOSURE PERMIT MODIFICATIONS

The Permittee must submit a written request for a permit modification to authorize a change in the approved Post-Closure Plan. This request must be made in accordance with applicable requirements of MHWMR Parts 124 and 270 and must include a copy of the amended Post-Closure Plan for approval by the Executive Director. The Permittee shall request a permit modification whenever changes in operating plans or facility design affect the approved Post-Closure Plan; there is a change in the expected year of final closure; or other events occur during the active life of the facility that affect the approved Post-Closure Plan. The Permittee must submit a written request for a permit modification at least sixty (60) days prior to the proposed change in facility design or operation, or no later than sixty (60) days after an unexpected event has occurred which affects the Post-Closure Plan. The Executive Director will approve, disapprove, or modify this plan in accordance with the procedures in MHWMR Parts 124 and 270. [MHWMR 264.118(d)]

MODULE IV – GROUNDWATER PROTECTION

IV.A. APPLICABILITY

The conditions of this module apply to the closed Hazardous Waste Tank System and two closed Surface Impoundments, as described in Condition III.A and depicted in Figure 1-3 of Appendix A.

IV.B. GROUNDWATER MONITORING PROGRAM

The Permittee shall conduct a corrective action groundwater monitoring program as required by MHWMR 264.91(a)(3). When the concentrations of hazardous constituents in Table 1 of Condition IV.D. have not exceeded the groundwater protection standards under Condition IV.C. for a period of three consecutive years, then the Permittee may petition the Executive Director for a permit modification to conduct a compliance monitoring program per MHWMR 264.99.

IV.C. GROUNDWATER PROTECTION STANDARDS

The groundwater protection standards under MHWMR 264.92 shall be equal to the concentration limits under Condition IV.D. during the corrective action compliance period. These groundwater protection standards are based on the Maximum Contaminant Limits (MCLs) as established in the National Primary Drinking Water Regulations under the Safe Drinking Water Act (SWDA). In cases where MCLs have not been promulgated, the standard shall be the tapwater screening level from the “Regional Screening Levels for Chemical Contaminants at Superfund Sites” (November 2011). If no such levels have been established, the Method Detection Limit (MDL) or, in the absence of MDLs, the Practical Quantitation Limits (PQL) or Limit of Quantitation (LOQ), shall be the groundwater protection standards. The Permittee may petition the Executive Director for a permit modification during the compliance period to establish additional groundwater protection standards based on alternate concentration limits (ACLs) under MHWMR 264.94(b). [MHWMR 264.100(a)]

IV.D. HAZARDOUS CONSTITUENTS AND CONCENTRATION LIMITS

The following constituents are present in the groundwater beneath the closed Surface Impoundments and the closed Hazardous Waste Tank System. The groundwater protection standards of Condition IV.C shall be based on the indicated concentration limits as required by MHWMR 264.94. Table 1 lists the hazardous constituents that have been detected above the groundwater protection standards and require routine monitoring. Table 2 lists any hazardous constituent that has previously been detected and that is reasonably expected to be in or derived from waste contained in a regulated unit but is not required to be monitored on a routine basis. The Permittee shall continue to implement a

compliance monitoring program to ensure that the corrective action program is effectively reducing these hazardous constituents beneath regulated units to achieve compliance with the groundwater protection standards. The following hazardous constituents and their concentration limits comprise the groundwater protection standards [MHWMR 264.100(a)(1)-(2)]:

Table 1: Monitored Hazardous Constituents

Constituents	Concentration Limit (µg/L)	Basis
<i>Volatile Organic Compounds</i>		
Benzene	5	MCL
Ethylbenzene	700	MCL
Styrene	100	MCL
Toluene	1,000	MCL
<i>Semivolatile Organic Compounds</i>		
Aniline	see Note 1	
Naphthalene	See Note 2	
o-Toluidine	See Note 3	

Table 2: Previously Detected Hazardous Constituents

Constituents	Concentration Limit (µg/L)	Basis
Acetophenone	1,500	SL ⁴
1,1-Dichloroethene	7	MCL
1,2-Dichloropropane	5	MCL
Dichloropropene	0.41	SL ⁴
2,4-Dimethylphenol	270	SL ⁴
Methacrylonitrile	0.75	SL ⁴
Methyl Chloride (Chloromethane)	190	SL ⁴
Phenol	4,500	SL ⁴
Tetrachloroethylene	5	MCL

Notes:

1. The GWPS is the greater of the most recent laboratory LOQ (currently 3 µg/L) or most recent 10⁻⁶ ELCR Regional Screening Level (currently 12 µg/L).
2. The GWPS is the greater of the most recent laboratory LOQ (currently 0.2 µg/L) or most recent 10⁻⁶ ELCR Regional Screening Level (currently 0.14 µg/L).
3. The GWPS is the greater of the most recent laboratory LOQ (currently 2 µg/L) or most recent 10⁻⁶ ELCR Regional Screening Level (currently 0.37 µg/L).
4. SL - Tapwater screening level from "Regional Screening Levels for Chemical Contaminants at Superfund Sites" 10⁻⁶ ELCR as of November 2011.

GWPS - groundwater protection standard

µg/L - micrograms per liter

LOQ - limit of quantitation

ELCR - excess lifetime cancer risk

IV.E. POINT OF COMPLIANCE

The point of compliance for the closed waste management areas (i.e., the close Hazardous Waste Tank System and Surface Impoundments) shall be the vertical surface located at the hydraulically downgradient limit of the waste management areas that extends down into the uppermost aquifer underlying the waste managements areas. (See Figure 1-3 of Appendix A for the compliance point well locations.) [MHWMR 264.100(a)(3)]

IV.F. COMPLIANCE PERIOD

The compliance period shall continue until the groundwater protection standards for all constituents specified in Table 1 of Condition IV.D. have not been exceeded in any compliance or effectiveness monitoring well for a period of three consecutive years. [MHWMR 264.100(a)(4)]

IV.G. GROUNDWATER MONITORING PROGRAM

The Permittee shall establish and implement a groundwater monitoring program to demonstrate the effectiveness of the corrective action program. The approved groundwater monitoring program is specified in the Groundwater Sampling and Analysis Plan (SAP), attached as Appendix F to EPA's HSWA Permit. [MHWMR 264.100(d)].

IV.H. RECORDKEEPING AND REPORTING

IV.H.1. The Permittee shall enter all monitoring, testing, and analytical data obtained in the operating record.

IV.H.2. The Permittee shall submit the analytical results required by the SAP annually to the Executive Director no later than March 31 of the following year. [MHWMR 264.100(g)]

IV.I. REQUEST FOR PERMIT MODIFICATION

If the Permittee or the Executive Director determines the corrective action groundwater monitoring program no longer satisfies the requirements of the regulations, the Permittee must, within 90 days of the determination, submit an application for a permit modification to make any appropriate changes to the program which will satisfy the regulations. [MHWMR 264.100(h)]

MODULE V – CORRECTIVE ACTION PROGRAM FOR REGULATED UNITS

A site-wide corrective action plan is being implemented at the Reichhold facility. This plan, described in EPA's Statement of Basis (Appendix D of Reichhold's HSWA Permit), addresses intermingled releases from Hazardous Waste Management Units, Solid Waste Management Units and Areas of Contamination. Because EPA has the authority to oversee and enforce corrective action addressing the intermingled groundwater plume, MDEQ shall defer oversight of Reichhold's Corrective Action Program under MHWMR 264.100 to EPA.

APPENDIX A
FIGURES

CERTIFICATE OF RESUBDIVISION

BOUNDARY DESCRIPTIONS OF THE 4 LOTS CREATED BY THIS RESUBDIVISION:

In accordance with Section 9-48 of the Code of Ordinance (Subdivision Regulations) of the City of Gulfport as amended, it is hereby certified that the Gulfport City Planning Commission Chairman and Gulfport City Council have reviewed and approved this Final Plat for the Resubdivision the property located in Section 19 & 20 Township 7 South, Range 10 West and described in Deed Book 1356, Page 83, City of Gulfport, First Judicial District of Harrison County, Mississippi, into Lot 1, Lot 2, Lot 3 and Lot 4, located in the Northeast 1/4 of the Northeast 1/4 of said Section 19 and the Northwest 1/4 of the Northwest 1/4 of said Section 20. The subject property is generally described as being located south of Reichhold Road. The ad valorem tax parcel numbers of the subject property is 1009K-02-001.001, 1009K-02-001.002 and 1009J-01-001.001. The Case File Number is 0508 CC 135.

BOUNDARY DESCRIPTION OF LAND PRIOR TO THIS RESUBDIVISION:

(DESCRIPTION PER DEED BOOK 1356 PAGES 85 AND 86)

PARCEL 1

The West 200 feet of Tract Number 2 as shown on a survey recorded in Deed Book 541, at Page 507 in the office of the Chancery Clerk of Harrison County, Mississippi, First Judicial District, said tract being situated in the NW 1/4 and SE 1/4 of Section 19, Township 7 South, Range 10 West, and containing 6.77 acres.

PARCEL 2

Tract Number 4 shown on a survey recorded in Deed Book 541, at Page 507 in the office of the Chancery Clerk of Harrison County, Mississippi, First Judicial District, LESS AND EXCEPT, however, a parcel of land described as follows: Beginning at point on the south margin of Reichhold Road (also known as Bayou View Road) at the NW corner of "Tract 4" as shown on a survey recorded in Deed Book 541, at Page 507 of the aforesaid records; thence South 72° 59' 23" East along said south margin 660 feet; thence South 17° 00' 37" West 506.94 feet; thence North 72° 59' 23" West 502.69 feet to said West line of Tract 4; thence North 0° 13' 45" West along said line 530.79 feet to the Point of Beginning. Said tract being situated in the NE 1/4 and the SE 1/4 of Section 19, Township 7 South, Range 10 West, Harrison County, Mississippi, such land being excepted herefrom is fully described as Parcel "A" in a survey prepared by A. Garner Russel dated August 22, 1974, attached to and made a part of a Special Warranty Deed recorded in Deed Book 737 at Pages 410-413 and re-recorded in Deed Book 738 at Pages 31-34 of the aforesaid records;

PARCEL 3

Beginning at the NW corner of Section 19, Township 7 South, Range 10 West; thence North 89° 36' 47" East 1400.34 feet to a point on the centerline of Lorraine and Bayou View Road; thence North 89° 39' 01" East 175 feet; thence South 00° 13' 45" East 1003.57 feet; thence South 72° 59' 23" East 2794.6 feet for POINT OF BEGINNING. From said POINT OF BEGINNING thence North 17° 00' 37" East 1475 feet; thence South 72° 59' 23" East 1000 feet; thence South 17° 00' 37" West 1475 feet; thence North 72° 59' 23" West 1000 feet to the POINT OF BEGINNING. Being located in Section 19 and 20, Township 7 South, Range 10 West, Harrison County, Mississippi, containing 33.86 acres, more or less, being designated as Tract Number 1 in a survey by H. A. Campbell, RLS, dated May 16, 1964, a copy of which is attached to and made a part of a Special Warranty Deed recorded in Deed Book 1083 at Pages 322-325 in the office of the Chancery Clerk of Harrison County, Mississippi, First Judicial District.

LOT 1

A parcel of land located in the Northeast 1/4 of the Northeast 1/4 of Section 19, Township 7 South, Range 10 West, City of Gulfport, First Judicial District, Harrison County, Mississippi; being more particularly described as follows:

COMMENCE at northwest corner of said Section 19; thence North 89 degrees 36 minutes 47 seconds East 1,400.34 feet; thence North 89 degrees 39 minutes 01 seconds East 175 feet; thence South 00 degrees 13 minutes 45 seconds East 1,003.57 feet; thence South 72 degrees 59 minutes 23 seconds East 2,270.5 feet to an iron pipe found on the eastern margin of a Mississippi Power Company right-of-way and the POINT OF BEGINNING; thence North 00 degrees 06 minutes 35 seconds West along said eastern margin 1014.07 feet to a concrete monument found; thence South 72 degrees 50 minutes 12 seconds East 503.00 feet to a concrete monument found; thence North 17 degrees 08 minutes 32 seconds East 506.90 feet to an iron rod found on the southern margin of Reichhold Road; thence South 72 degrees 59 minutes 33 seconds East along said southern margin 259.50 feet to an iron rod set; thence South 17 degrees 08 minutes 32 seconds West 1474.71 feet to an iron rod set; thence North 72 degrees 59 minutes 23 seconds West 461.75 feet to the POINT OF BEGINNING.

Contains 16.623 acres, more or less.

LOT 2

A parcel of land located in the Northeast 1/4 of the Northeast 1/4 of Section 19, Township 7 South, Range 10 West, City of Gulfport, First Judicial District, Harrison County, Mississippi; being more particularly described as follows:

COMMENCE at northwest corner of said Section 19; thence North 89 degrees 36 minutes 47 seconds East 1,400.34 feet; thence North 89 degrees 39 minutes 01 seconds East 175 feet; thence South 00 degrees 13 minutes 45 seconds East 1,003.57 feet; thence South 72 degrees 59 minutes 23 seconds East 2,270.5 feet to an iron pipe found on the eastern margin of a Mississippi Power Company right-of-way; thence continue South 72 degrees 59 minutes 23 seconds East 461.75 feet to an iron rod set; thence North 17 degrees 08 minutes 32 seconds East 1324.71 feet to an iron rod set and the POINT OF BEGINNING; thence continue North 17 degrees 08 minutes 32 seconds East 150.00 feet to an iron rod set on the southern margin of Reichhold Road; thence South 72 degrees 59 minutes 33 seconds East along said southern margin 511.81 feet to an iron rod set; thence South 16 degrees 58 minutes 58 seconds West 150.00 feet to an iron rod set; thence North 72 degrees 59 minutes 33 seconds West 512.23 feet to the POINT OF BEGINNING.

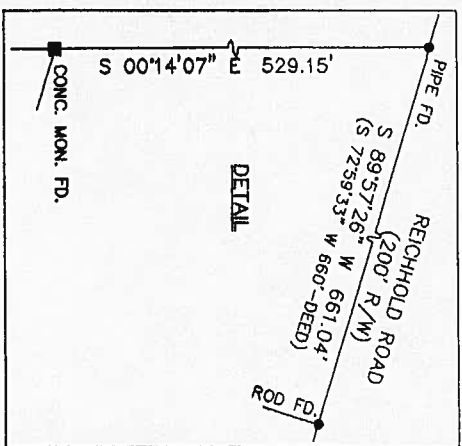
Contains 1.763 acres, more or less.



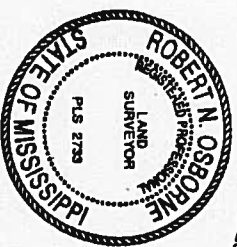
1st Judicial District
Instrument 2005 19631 D -J1
Filed/Recorded 8 18 2005 11 44 A
Total Fees 13.00
3 Pages Recorded

KNEAL ENGINEERING
SERVICES, INC.

14321 Creech Rd., Gulfport, Ms 39503
Ph: (228)267-9100, FAX: (228)265-0043
DWG. NO.: 2044-PLAT



MISSISSIPPI POWER COMPANY RIGHT-OF-WAY



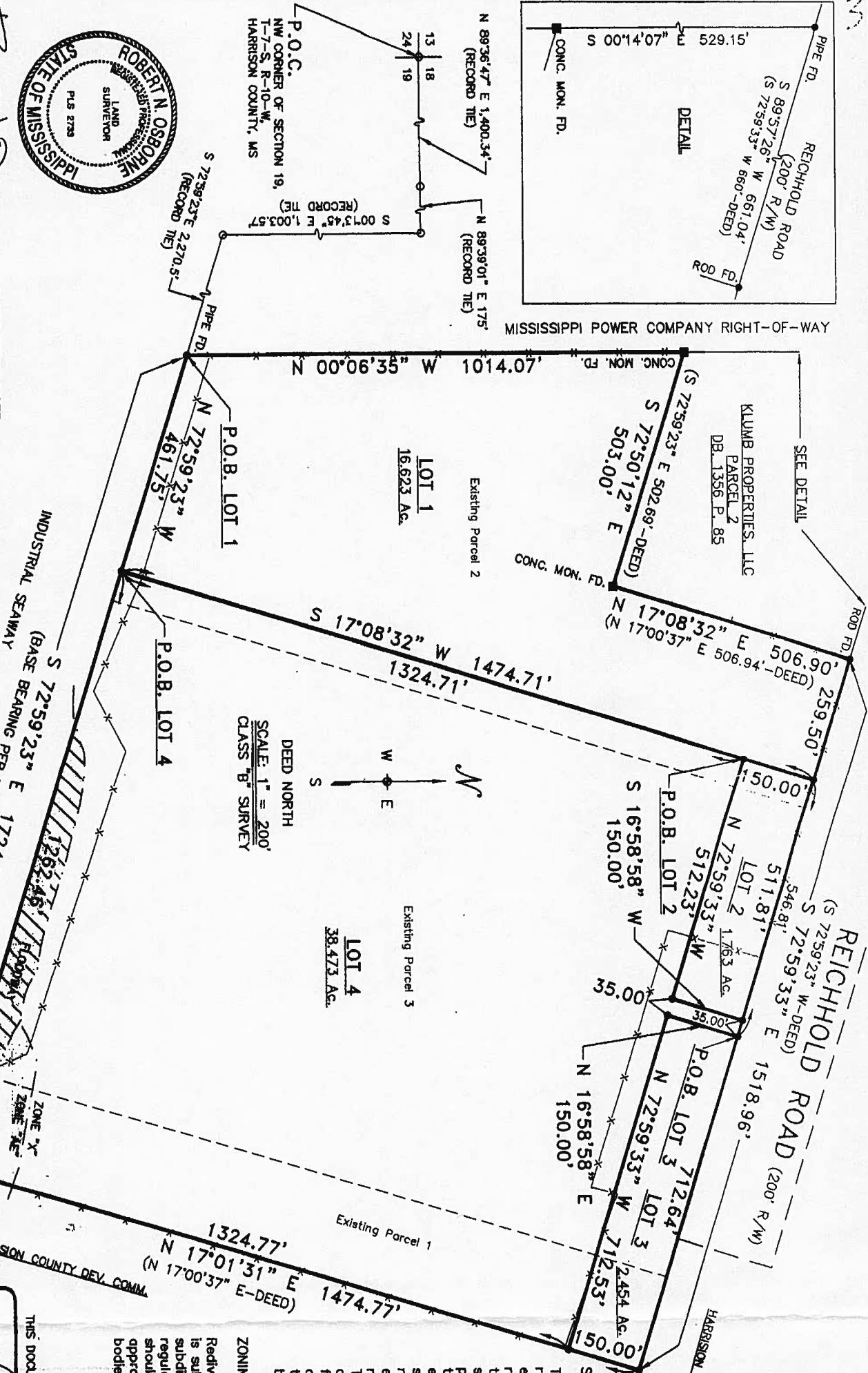
Robert N. Osborne
 Robert N. Osborne, P.L.S.
 Field Surveyed June 6, 2005.
 Revised notes June 8, 2005.
 PAGE 3 OF 3

FLOOD ZONE NOTE:
 This property is located in Zone "AE" on F.I.R.M. 2852530042D
 Map Revised October 4, 2002 & Index Revised October 4, 2002
 Base Flood Elev. is 11 feet.
 Contact local enforcement agency for verification of BFE.

SCALE: 1" = 200'
 CLASS "B" SURVEY

DEED NORTH
 SCALE: 1" = 200'
 CLASS "B" SURVEY

INDUSTRIAL SEAWAY
 (BASE BEARING PER DB 1356, P. 85)
 S 72°59'23" E 1724.21'
 = ROD SET UNLESS OTHERWISE NOTED.
 050 P.C. @ 135



BASE BEARING NOTE:
 Record bearings and distances shown are based on a survey by Dwight D. Warren dated 1994, and deed recorded on Deed Book 1356, Page 85.

SURVEYOR'S NOTE:
 This survey shows rights-of-way, easements, and restrictions provided to the surveyor. Since this survey was not provided with a current title report nor an environmental study, this survey may not show all rights-of-way, easements, and restrictions of record. This surveyor will be available to add such features to this survey if a current abstract of title is provided to him by an attorney.

ZONING NOTE:
 Redivision of this property is subject to current subdivision and zoning regulations. Approval should be obtained by the appropriate governing bodies.

THIS DOCUMENT WAS PREPARED BY:

KNEALE ENGINEERING
 SERVICES, INC.
 14321 Creech Rd., Gulfport, Ms 39505
 Ph: (228) 867-9100, Fax: (228) 865-0043
 DWG. NO.: 2044-PL1

APPENDIX B
POST-CLOSURE PLAN

Post-closure Plan

This post-closure plan specifies the maintenance and monitoring activities that will be performed by Reichhold, Inc. (Reichhold) for the hazardous waste management units (HWMUs) at the Gulfport site. The plan was prepared in accordance with 40 *Code of Federal Regulations* (CFR) 270.14(b)(13) and 40 CFR 264.118.

With the most recent permit renewal, the Mississippi Department of Environmental Quality (MDEQ) approved Reichhold's request to eliminate maintenance of the HWMU covers. The basis for the request/approval (as discussed in Section B-1.1.1 of the permit application) is that the data indicate that hazardous waste is not present in the units and that the reported soil concentrations associated with these units do not pose a unique threat (that is, the concentrations are similar to other solid waste management unit [SWMU] and area of concern [AOC] concentrations).

1.0 Inspection, Monitoring, and Maintenance Activities and Frequencies

Reichhold will evaluate the need for maintenance of the monitoring systems, remediation systems, and security systems by conducting inspections of these areas, as described below. Inspections will consist of a walk-over and visual evaluation of the areas by a designated Reichhold representative. Inspection results (and any needed corrective measures) will be documented in writing to the Reichhold project manager.

1.1 Security Control Devices

The fences, gates, and locks on the entrance gates around the site will be inspected monthly to detect deterioration or vandalism. Monitoring wells will be inspected during scheduled sampling events to ensure the security of those structures.

1.2 Groundwater Monitoring System

Site groundwater monitoring wells will be inspected during sampling events or at a minimum frequency of annually with this permit renewal. The wells will be visually inspected for the presence of a locking cap, evidence of vandalism or tampering, and overall structural integrity. Any well found severely damaged will require replacement with one of similar characteristics in the same general location. Damage to a groundwater monitoring well that is visually noted will be reported to MDEQ during the groundwater monitoring reports.

1.3 Benchmark Integrity

Annually, all permanent surveying benchmarks included in the survey plat prepared at the beginning of post-closure will be located and checked for structural integrity and stability.

1.4 Groundwater Corrective Action Systems

The groundwater extraction and phytoremediation systems will be inspected monthly, as long as they are in operation. Trees will be inspected for excessive mortality and damage from storms or other natural events. In the event that excessive damage is noted, the Reichhold project manager will be notified and appropriate actions will be taken. The groundwater extraction wells, pipelines, and tanks will be inspected for proper operation, leakage, and structural damage. Damage to the extraction system will be repaired as soon as possible.

2.0 Groundwater Monitoring Activities and Frequencies

The groundwater monitoring activities and frequencies to be followed during the post-closure care period are described in the *Corrective Action Groundwater Monitoring Program: Sampling and Analysis Plan* (CH2M HILL, December 2008; revised May 2012) – Appendix F of the U.S. Environmental Protection Agency (EPA) Portion of the RCRA Permit Pursuant to the Hazardous and Solid Waste Amendments (HSWA) for the site.

3.0 Post-closure Contact

During the post-closure care period, the following person will retain and update the post-closure plan for this site:

Gulfport Project Manager–Site Remediation
Reichhold Chemicals, Inc.
P.O. Box 13582
Research Triangle Park, North Carolina 27709-3582
Telephone: (919) 990-7509

The person designated above as the post-closure contact for Reichhold will be responsible for distributing updates of the post-closure plan to all holders of other copies of the plan. The post-closure plan will be amended if events during the post-closure care period require change to the current document. In such cases, the requirements for modification of the plan will be made to MDEQ within 60 days before the event affecting the plan, or within 60 days after unexpected events. Updated post-closure plans will be submitted to EPA, MDEQ, and the Harrison County Planning Commission.