

## UNDERGROUND STORAGE TANK GROUNDWATER REMEDIATION NOTICE OF INTENT (USTNOI)

For Coverage under Mississippi's Underground Storage Tank (UST)
Groundwater Remediation General Permit
General Permit MSG12 2 2 1

(NUMBER TO BE ASSIGNED BY STATE)

## INSTRUCTIONS

Applicant must be the owner or operator of the remediation system. To avoid unnecessary delays, please be sure that the USTNOI is signed in accordance with Activity (ACT) 9, T-4, page 19 of the General Permit. The owner or operator that receives coverage is responsible for permit compliance. File at least 30 days prior to proposed discharge.

## Required Submittals with the USTNOI Include:

- A USGS quadrangle map or copy extending at least one-half of a mile beyond the site's property boundary.
   The site location and outfalls must be outlined or highlighted. Quad maps can be obtained from the Office of Geology at 601-961-5523. If a copy is submitted, provide the name of the quadrangle map that is found in upper right hand corner.
- A letter of approval or denial from an available POTW or Wastewater Authority (see permit Activity 4, S-6, page 6 and MDEQ Wastewater Regulations, Chapter One, Part I.C.1.a.).
- Certified-return receipts from contiguous landowner notifications (not required if the remediation system was operating under a previous permit or coverage see permit Activity 4, S-7, page 6.)
- A list of water treatment chemicals proposed to be used. Please submit the following information for each specific chemical: name and composition of the additive, discharge concentration, dosage addition rates, frequency of use, EPA registration (if applicable), and aquatic species toxicological data.

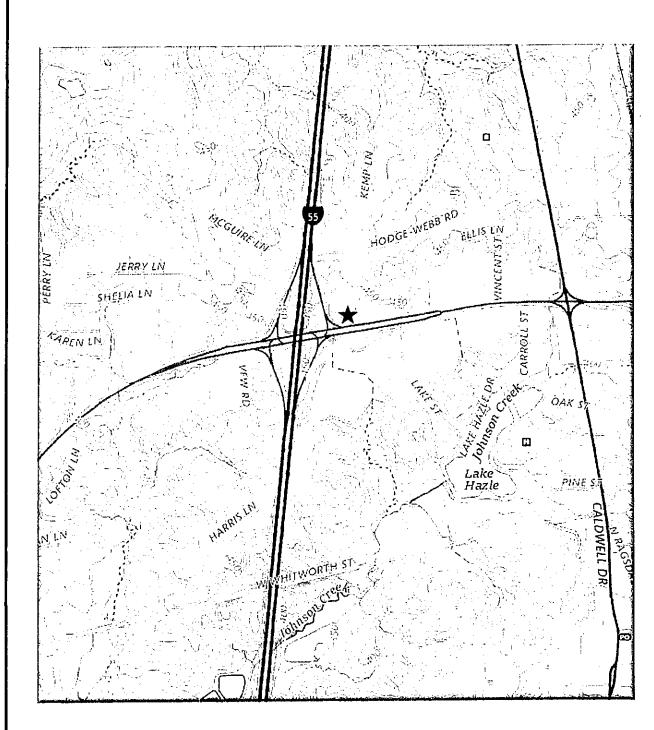
ALL INFORMATION REQUESTS MUST BE ANSWERED (answer "NA" if not applicable)

April 29, 2008 Page 1 of 3

## POTW OR WASTEWATER AUTHORITY NOTIFICATION AND APPROVAL FORM

POTW or Wastewater Authority notification and approval request to discharge remediated groundwater associated with a leaking Underground Storage Tank (UST) - see Activity 4, S-6, page 6.

APPLICANT (please	e print or type)
Neel-Schaffer, Inc.	[name of applicant] is applying for coverage
under Mississippi's Underground Storage Tank Groundy	water Remediation General Permit [copy
attached). Neel-Schaffer, Inc.	[name of applicant] is proposing to
discharge remediated groundwater, associated with a lea	
site located at 28053 Highway 28 West, Hazlehurst, Co	piah Co,
Mississippi 39083 (Phillips 66 Food Plaza)	[complete address with county].
Approximately 0.003 to 0.02 [proposed	volume in MGD] of treated groundwater will be
discharged to City of Hazlehurst	name of local POTW or
Authority]. The treated groundwater will be discharged	in accordance with the conditions, requirements
and limitations of Mississippi's Underground Storage T	ank Groundwater Remediation General Permit.
POTW or WASTEWA	1
The Mississippi Department of Environmental Quality ( POTW or Wastewater Authority in order for the applica Underground Storage Tank Groundwater Remediation ( discharging remediated groundwater to a POTW or War please contact the Service and Miscellaneous Industries	General Permit. Coverage is required prior to stewater Authority. If you have any questions,
I certify that I am a duly authorized representative of the for managing daily operations. I am familiar with the represent and acknowledge that, by signing this form, I an proposed discharge to our treatment works.	is POTW (or Authority) and directly responsible equirements of the above referenced General a providing MDEQ with written approval of this
POTW (or Authority) Authorized Signature  Kenneth EARI RAMSEY  Printed Name	Date Signed
Į.	
Daytime Telephone	
	March 2006





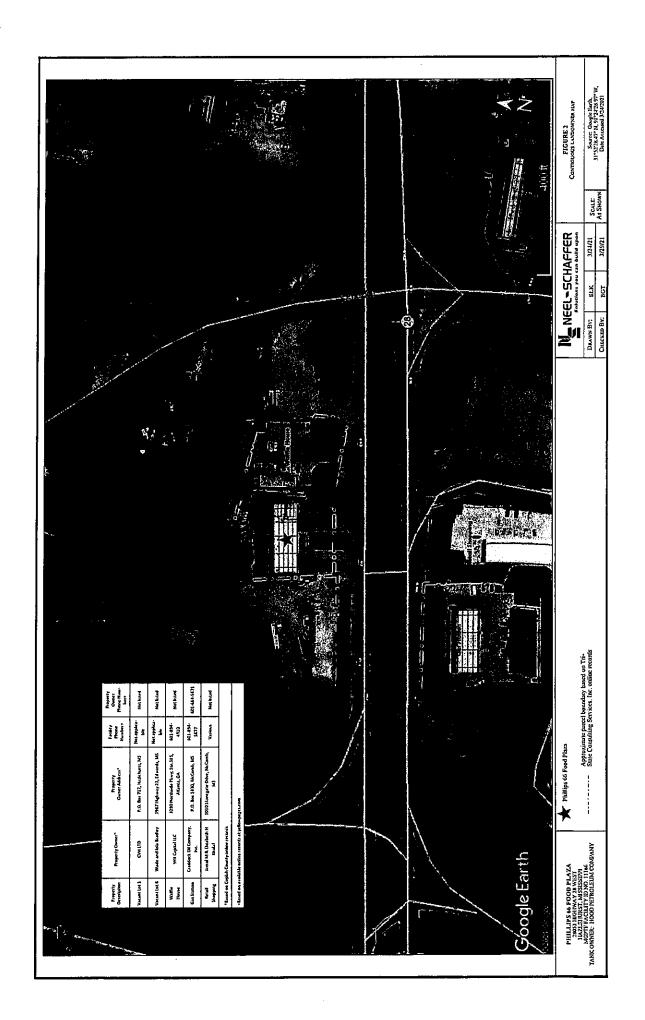
PHILLIPS 66 FOOD PLAZA



PHILLIPS 66 FOOD PLAZA 28053 HIGHWAY 28 WEST HAZLEHURST, MISSISSIPPI TANK OWNER: HOOD PETROLEUM COMPANY MGPTF FACILITY ID NO. 11186 Site Location Map

SCALE: 1" ~ 1,335' A

FIGURE



## CONTIGUOUS LANDOWNER NOTIFICATION OF CORRECTIVE

## ACTION AND SUBSEQUENT DISCHARGE OF TREATED

## GROUNDWATER DUE TO LEAKING

# UNDERGROUND STORAGE TANK(S) (see Activity 4, S-7 of the USTGP.)

Underground storage tanks located at 28053 Highway 28 West, Hazlehurst, Copiah C	County
Mississippi 39083 (Phillips 66 Food Plaza) [street address	with city and county]
have been determined to have released motor fuel. In order to protect the environment	nt and public health a
cleanup process must be started. The cleanup involves bringing a trailer contained greater	oundwater treatment
system to the site, pumping out the contaminated groundwater, treating it and discharge	ging the treated water
into the city wastewater sewer to be further treated or, in rare cases, to State waters.	The recovered fuel is
disposed at an offsite permitted facility. The average time a unit is on site is thirty-fiv	ve months.
Neel-Schaffer, Inc.	[applicant's name]
101 Business Park Drive, Suite A, Ridgeland, Mississippi 39157	[address]
(601) 348-3071 [phone number] is proposing to begin the cleanup process as	nd discharge treated
groundwater to City of Hazlehurst Publicly Owned Treatment Works	[name of
receiving stream or Publicly Owned Treatment Works or Wastewater Authority]. This	is notification is to
provide you with an opportunity to comment to the Mississippi Department of Enviro	onmental Quality Permit
Board before the Board makes a final decision regarding the matter. No discharge of	treated groundwater
will occur unless the Board grants coverage of this activity under the General Permit	for Underground
Storage Tank Groundwater Remediation. This notice has been sent to you by Certific	ed Mail - Return
Receipt Requested. If you have no comments regarding this proposed facility, no resp	ponse is necessary and
the permitting process will continue. If you have any comments, they must be received	ed by the Mississippi
Department of Environmental Quality within 10 days of receipt of this correspondence	ce. The Department of
Environmental Quality is limited in its review of this project to those environmental	ntal issues in which
statutory authority has been given. If you have any questions you may contact the	Service and
Miscellaneous Branch of MDEQ at (601) 961-5171. Comments are to be mailed to the	he following address:
Chief, Environmental Permits Division  MS Department of Environmental Quality, Office of Pollution Co	ontrol

P. O. Box 2261 Jackson, Mississippi 39225-2261

March 2006 Page I of I

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
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PS Form 3811, July 2020 PSN 7530-02-000-9053	Domestic Return Bacelot

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so that we can return the card to you.  Attach this card to the back of the mailplece,	B. Received by (Printed Name) C. Date of Delivery
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PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
■ Complete items 1, 2, and 3.  ■ Print your name and address on the reverse so that we can return the card to you.  ■ Attach this card to the back of the malipiece, or on the front if space permits.  1. Article Addressed to:  WH (apitul LLC)  PO Box 6450  Norcesson 6A 3009	A. Signature  X
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2. Addition of the 2007 1813 4	ICL Collect on Delivery Restricted Delivery Restricted Delivery  155   lestricted Delivery   Restricted Delive

PS Form 3811, July 2020 PSN 7530-02-000-8053

Domestic Return Receipt ·



April 28, 2022

Tyler Berry Neel-Schaffer 101 Buisness Park Drive, Suite A Ridgeland, MS 39157

TEL: FAX:

RE: Phillips 66

Order No.: 220

2204153

Dear Tyler Berry:

This is your final report for Workorder No. 2204153 and takes precedence over any previous preliminary report.

The samples were received as stated on the chain of custody. All samples met requirements unless otherwise noted. Samples were analyzed using approved EPA/FDA methods. Reports generated by EDL are exclusively intended for our clients and their use.

This report may not be reproduced except in full, without written approval of the laboratory. All samples are disposed of within 30 days of receipt unless other arrangements have been agreed upon beforehand.

Please contact the EDL team if you have any questions regarding your data package.

Jonathan Stephens

Operations Manager



Report of Analytical Results

Client:

Neel-Schaffer

Lab ID:

2204153-002

Project:

Phillips 66

Client Sample ID:

MW-12 3

**Collection Date:** 

04/22/22 9:29

Sampled By:

PO No:

15902.000.004

15902.000.004

WO No:

2204153

Project No:

11186

Facility ID No: Date Received:

04/22/22 14:03

Matrix:

**AQUEOUS** 

Parameter	Result	Limits	Qual	RL	DF	Units	Analysis Dat	e/Time	Method	Analyst
METALS Iron	78.5			0.900	100	mg/i	4/27/2022	15:59	200.7	JGB
Hardness (As CaCO3)	290			0.100	1	mg/l	4/28/2022	10:57	130.2	JGB

#### Qualifiers:

- Value exceeds permit limit.
- BDL Below Detection Limit
- Value above quantitation range Ε
- Holding times for preparation or analysis exceeded Н
- RPD outside accepted recovery limits R

- Recoveries affected by interferences/high background A
- С Value is below Minimum Compound Limit.
- Sample dilution caused poor/no surrogate recovery.

  Original
- PQL Practical Quantitation Limit
- Spike Recovery outside accepted recovery Rage 3 of 3

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**DBPix Evaluation** 

From:

**Boz Ettehad** 

To:

Tyler Berry

Subject:

RE: Remediation System Chemical for Hardness and Iron

Date: Attachments: Friday, June 17, 2022 4:05:30 PM Analytix AN-330GH SDS GHS 2016.pdf

Hi Tyler;

Considering the very high levels of influent iron, I suggest amending our Analytix AN-330GH antiscalent after the AWS / prior to the AWS to OWS transfer pump in tandem with the operation of the transfer pump. Injecting at this point will help protect the transfer pumps, OWS and AST from excess accumulation of iron, iron related bacterial slime and calcification.

AN-330GH is formulated with an iron dispersant, similar to our AN-450FG product, and biodegradable Glycolic acid. SDS is attached. The recommended dosage to pre-treat 80 ppm iron is 125 ppm as product, or about 3.5 gallons per day to treat 20 GPM average water thruput rate (28,800GPD).

Discharge to POTW will not be an issue.

The current price of the AN-330GH is \$1,450 per 55-gal drum plus freight ~ \$250 per drum.

Regards

Boz

Sent from Mail for Windows

From: Tyler Berry

Sent: Friday, June 17, 2022 2:58 PM

To: Boz Ettehad

Subject: RE: Remediation System Chemical for Hardness and Iron

Here are the specs on the DPE system. If case you need them.

RTB

From: Boz Ettehad <analytix@earthlink.net> **Sent:** Friday, June 17, 2022 12:52 PM

To: Tyler Berry <tyler.berry@neel-schaffer.com>

Subject: RE: Remediation System Chemical for Hardness and Iron

Hi Tyler;

Please provide a description of the planned remediation system flow sheet and treatment rate per day.

### Neel-Schaffer, Inc. Confidentiality Note:

Information contained in this message along with any attachment(s) may be confidential and protected by legal privilege. This message is meant solely for the use of the individual(s) to whom it is addressed. Viewing or the use of information and attachment(s) within this message without the expressed permission of Neel-Schaffer, inc. is prohibited. If you are not the intended recipient of this message. Neel-Schaffer, Inc. requests you take immediate action to notify the sender of the error and that you delete this message and all attachments without modifying, copying or distributing its content.

### 3. COMPOSITION / INFORMATION ON INGREDIENTS

Mixture of water treatment chemicals

Chemical Name	CAS No.	GHS Classification
Sodium Polycarboxylate - (acrylic copolymer)	Not Hazardous	None
1-Hydroxyethylidene-1,1-diphosphonic Acid	2809-21-4	Eye Damage 1, Skin 2, Oral 5
Hydroxyacetic Acid - (glycolic acid)	79-14-1	Eye Damage 1, Skin 1A, Inhalation & Ingestion 4
Water	7732-18 <b>-</b> 5	None

Specific chemical identity and/or percentages of composition have been withheld as a trade secret

### 4. FIRST AID MEASURES

Eyes	Immediately flush with water for at least 15 minutes, lifting the upper and lower eyelids intermittently. See a medical doctor or ophthalmologist immediately.
	Immediate first aid is not likely to be required. Wash with plenty of soap and water. Get medical attention . if irritation occurs and persists.
Ingestion	Rinse mouth with water. Dilute by drinking plenty of water. Do not induce vomiting. Never give anything by mouth to an unconscious person. A physician can be contacted for advice.
Inhalation	Immediate first aid is not likely to be required. Move to fresh air. If breathing difficulty or discomfortoccurs and persists, contact a medical doctor.

NOTES TO MEDICAL DOCTOR: The product is corrosive to the eyes and is expected to be irritating to the mucous membranes of the respiratory and gastrointestinal tracts. Treatment is controlled removal of exposure with symptomatic and supportive care.

### 5. FIRE FIGHTING MEASURES

SUITABLE EXTINGUISHING MEDIA: alcohol resistant foam, CO2, powder, water spray

UNSUITABLE EXTINGUISHING MEDIA: Water jet

SPECIAL FIRE FIGHTING PROCEDURES Wear self-contained breathing apparatus with a full face piece operated in the positive pressure demand mode when fighting fires.

HAZARDOUS DECOMPOSITION: CO, CO2

ERG Guide No. 153

## 6. ACCIDENTAL RELEASE MEASURES

<u>PROTECTIVE PRECAUTIONS AND EMERGENCY PROCEDURES</u> Keep unnecessary personnel away. Wear appropriate protective equipment and clothing during clean-up. Do not breather mist or vapors. Ensure adequate ventilation

CONTAINMENT PROCEDURE Prevent further leakage or spillage if safe to do so. Contain spills to prevent migration and entry into waterway.

<u>CLEANUP PROCEDURE</u> Contain large spills with dikes and transfer material to appropriate containers for reclamation or disposal. Absorb remaining material or small spills with lime or soda ash and then place in a chemical waste container.

### 10. STABILITY AND REACTIVITY

REACTIVITY May react with strong bases and oxidizing agents

STABILITY: Stable under normal conditions

CONDITIONS TO AVOID: contact with strong bases, strong oxidizers

INCOMPATIBILITY: No further relevant information available

HAZARDOUS DECOMPOSITION: CO, CO2

HAZARDOUS POLYMERIZATION: Will not occur.

#### 11. TOXICOLOGICAL INFORMATION

This is a blended product. No data on the neat product is available. The following data is available for the active components, which have been diluted to make this product.

#### Hydroxyacetic Acid - (glycolic acid)

Inhalation 4 h LC50: 3.6 mg/l, Rat (as dust, 100% solid)

Dermal Acute toxicity estimate: > 5,000 mg/kg , human Oral LD50: > 2,040 mg/kg , Rat

Skin irritation: Causes burns. Rabbit

## 1-Hydroxyethylidene-1,1-diphosphonic acid:

Sodium Polycarboxylate - (acrylic copolymer):

Eye Irritation........ Slight Irritant (rabbit) Dermal  $LD_{50}$ ......... > 5000 mg/kg (rabbit) Skin Irritation...... Non-irritant (rabbit) Oral  $LD_{50}$  ....... > 5000 mg/kg (rat)

Carcinogenicity: None of the components present in this material at concentrations equal to or greater than 0.1% are listed by IARC, NTP, or OSHA, as a carcinogen.

#### 12. ECOLOGICAL INFORMATION

This is a blended product. No ecological information on the neat product is available. The following data is based on information available for active components, which have been diluted to make this product.

## Sodium Polycarboxylate:

Daphnia magna, 48 Hour EC50:	. > 1,000 mg/l
NOEC:	. > 1,000 mg/l
Rainbow trout (Salmo gairdneri), 96 Hour LC50:	. > 1,000 mg/l
NOEC:	. = 560  mg/l
Bluegill sunfish (Lepomis macrochirus), 96 Hour LC50:	. > 1,000 mg/l
NOEC:	

#### Hydroxyacetic Acid - (glycolic acid):

Green Algae	Pseudokirchneriella subcapitata, 72-hour EC50	=	44	mg/l
_	72-hour. NOEC	=	20	ml/l
Fish	Pimephales promelas (fathead minnow), 96-hour LC50	=	164	mg/l
Invertebrates	Daphnia magna (water flea), 48 Hour EC50:	=	141	m <b>g/i</b>

Readily Biodegradable per OECD Test

## Safety Data Sheet AN-330GH

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#### 15. REGULATORY INFORMATION

Following information pertains to each active component in the product, when applicable. UNITED STATES

SARA TITLE 3 (Superfund Amendments and Reauthorization Act) – Not listed
Section 302 Extremely Hazardous Substances (40 CFR 355) – Not listed
Section 304 Reportable Quantity: Not applicable
Section 311/312 Hazard Category (40 CFR 370) – Immediate (Acute) Health Hazard
Section 313 Reportable Ingredients (40 CFR 372) – Not listed

CERCLA (Comprehensive Environmental Response Compensation and Liability Act) (40 CFR 302.4)-Not listed.

TSCA (Toxic Substance Control Act) (40 CFR 710) - Listed

## 16. OTHER INFORMATION

Suggested HMIS Ratings - Health - 2 Flammability - 0 Reactivity - 1 Protection - D

NFPA Rating Health - 2 Flammability - 0 Reactivity - 1 Special - None

HMIS Rating notes - Protection D = Splash Proof Goggles, Face Shield, Gloves, Apron

Date Prepared: 5-20-2015 Date Revised: 12-15-2015

The information contained herein is to the best of our knowledge and belief, accurate, but any recommendations or suggestions made are without warranty or guarantee of results, expressed or implied. We therefore, assume no liability for loss or damage incurred by following these suggestions. Any determination of fitness for a particular purpose is the buyer's responsibility. Analytix Technologies urges persons receiving this information to make their own determination as to the information's suitability and completeness for their particular application. Analytix Technologies' only obligation will be to replace such quantity of groduct proved to be defective. User assumes all risks and liability whatsoever in connection with the suitability of the product for the users intended application. Analytix Technologies shall not be responsible in tort, contract or under any theory for any loss or damage, incidental or consequential, arising out of the use of or the inability to use the products.



June 21, 2022 N-S Project No. 15902.000.004

Mr. Chris Messemore, P.E. Mississippi Department of Environmental Quality **Environmental Permits Division** Post Office Box 2261 Jackson, Mississippi 39225-2261

REFERENCE:

DISCHARGE PERMIT APPLICATION PHILLIPS 66 FOOD PLAZA 28053 HIGHWAY 28 WEST HAZLEHURST, MISSISSIPPI MGPTF FACILITY I.D. NO. 11186

Dear Mr. Messemore:

Submitted herewith is the General Discharge Permit Application and supporting documents for discharges related to the Phillips 66 Food Plaza facility located at 28053 Highway 28 West, Hazlehurst, Mississippi. A copy of this permit application has been submitted to Ms. Brittany Jamison, Project Manager, in the Underground Storage Tank Branch. Should you have questions or require additional information, please contact us at (601) 948-3071.

A groundwater sample was collected from monitor well MW-12 and analyzed for hardness and iron. The laboratory analyses were performed to determine whether scaling of calcium carbonate or iron may present a concern within the components of the remediation system and the system effluent line. The groundwater hardness concentration was reported as 290 milligrams per liter (mg/L). Iron scaling buildup can occur as groundwater is aerated through groundwater remediation activities. The groundwater iron concentration for monitor well MW-12 was reported as 78.5 mg/L. Consequently, we anticipate significant scaling buildup within the system and the system effluent line and propose utilizing an anti-scaling chemical in the water treatment process. The laboratory analytical report and proposed anti-scaling chemical supporting documents are attached.







