STATE OF MISSISSIPPI
HAZARDOUS WASTE MANAGEMENT
PERMIT

THIS CERTIFIES THAT

AMERICAN WOOD, DIVISION OF POWE TIMBER COMPANY
Highway 15 North
Richton, MS
Perry County
MSD 021 019 914

is hereby authorized to conduct post closure care for a closed surface impoundment

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: SEP 2 8 2012

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Permit No.: MSD 021 019 914

Expires: August 31, 2022

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MODULE I - GENERAL PERMIT CONDITIONS

I.A EFFECT OF PERMIT

The Permittee is required to conduct post-closure activities for a hazardous waste surface impoundment in accordance with the conditions of this Permit. Subject to Mississippi Hazardous Waste Management Regulation (MHWMR) 270.4, compliance with this Permit generally constitutes compliance, for purposes of enforcement, with Mississippi Solid Waste Disposal Law (MSWDL) of 1974, as amended. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, any infringement of state or local law or regulations, or preclude compliance with any other Federal, State, and/or local laws and/or regulations governing the treatment and handling of explosives. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 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. [MHWMR 270.4, 270.30(g)]

I.B PERMIT ACTIONS

I.B.1 Permit Modification, Revocation and Reissuance, and Termination

This Permit may be modified, revoked and reissued, or terminated for cause, as specified in MHWMR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition. [MHWMR 270.4(a) and 270.30(f)]

I.B.2 Permit Renewal

This Permit may be renewed as specified in MHWMR 270.30(b) and Permit Condition I.E.2. Review of any application for a Permit renewal shall consider improvements in the state of control and measurement technology, as well as changes in applicable regulations. [MHWMR 270.30(b)]

I.C. SEVERABILITY

The provisions of this Permit are severable, and if any provision 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. [MHWMR 124.16(a)]

I.D. DEFINITIONS

For purposes of this Permit, terms used herein shall have the same meaning as those in MHWMR Parts 124, 260, 264, 266, 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 reference or the generally accepted scientific or industrial meaning of the term.

I.D.1 "Facility" for purposes of this permit includes all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g. one or more landfills, surface impoundments, or combination of them). For the purposes of implementing corrective action under MHWMR Part 264.101, a facility includes all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA.

I.D.2 "Director" means the Executive Director of the Mississippi Department of Environmental Quality, or his designee or authorized representative.

I.D.3 A "hazardous constituent" for purposes of this permit are those substances listed in MHWMR Part 261 Appendix VIII and Part 264 Appendix IX.

I.D.4 "Land Disposal" for purposes of this permit and MHWMR Part 268 means placement in or on the land except for a CAMU and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, underground mine or cave, or concrete vault or bunker intended for disposal purposes.

I.D.5 A "release" for purposes of this permit includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste or hazardous constituents.

I.D.6 "Corrective Action" for the purposes of this permit, may include "corrective action" as provided in MHWMR 264.100.

I.D.7 A "unit" for the purposes of this permit includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank, container storage area, septic tank, drain field, wastewater treatment unit, elementary neutralization unit, transfer station, or recycling unit

I.D.8 "Solid waste" means any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges which are point sources subject to permits under section 402 of the Federal Water Pollution Control Act, as amended (86 Stat. 880), or source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 923).

I.E. DUTIES AND REQUIREMENTS

I.E.1 Duty to Comply

The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an emergency Permit. Any Permit noncompliance, other than noncompliance authorized by an emergency Permit, constitutes a violation of Mississippi Solid Waste Disposal Law, Sections 17-17-1, et seq., Mississippi Code Annotated and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. [MHWMR 270.30(a)]

I.E.2 Duty to Reapply

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), 270.30(b)]

I.E.3 Permit Expiration

Pursuant to MHWMR 270.50, this Permit shall be effective for a fixed term not to exceed ten (10) years. As long as MDEQ is the Permit-issuing authority, 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 (see MHWMR 270.10, 270.13 through 270.29) and, through no fault of the Permittee, the Director has not issued a new Permit, as set forth in MHWMR 270.51.

I.E.4 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee, in an enforcement action that it would have been necessary, to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit. [MHWMR 270.30(c)]

I.E.5 Duty to Mitigate

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures, as are reasonable, to prevent significant adverse impacts on human health or the environment. [MHWMR 270.30(d)]

I.E.6 Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit. [MHWMR 270.30(e)]

I.E.7 Duty to Provide Information

The Permittee shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit,

or to determine compliance with this Permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this Permit. [MHWMR 264.74(a), 270.30(h)]

I.E.8 Inspection and Entry

Pursuant to MHWMR 270.30(i), the Permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and other documents, as may be required by law, to:

I.E.8.a Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;

I.E.8.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;

I.E.8.c Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

I.E.8.d Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by MSWDL, any substances or parameters at any location.

I.E.9 Monitoring and Records

The Director may require such testing by the Permittee, and may make such modifications to this permit, deemed necessary to ensure implementation of new regulations or requirements, or to ensure protection of human health and the environment.

I.E.9.a Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample to be analyzed must be the appropriate method from the Groundwater Sampling and Analysis Plan (Attachment C) or an equivalent method approved by the Director. Laboratory methods must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, Standard Methods of Wastewater Analysis*, or an equivalent

method, as specified in the Groundwater Sampling and Analysis Plan (See Permit Attachment C). [MHWMR 270.30(j)(1)]

I.E.9.b The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, the certification required by MHWMR 264.73(b)(9), and records of all data used to complete the application for this Permit for a period of at least 3 years from the date of the sample, measurement, report, record, certification, or application. These periods may be extended by request of the Director at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility. [MHWMR 264.74(b) and 270.30(j)(2)]

I.E.9.c Pursuant to MHWMR 270.30(j)(3), records of monitoring information shall specify:

I.E.9.c.i The dates, exact place, and times of sampling or measurements;

I.E.9.c.ii The individuals who performed the sampling or measurements;

I.E.9.c.iii The dates analyses were performed;

I.E.9.c.iv The individuals who performed the analyses;

I.E.9.c.v The analytical techniques or methods used; and

I.E.9.c.vi The results of such analyses.

I.E.10 Reporting Planned Changes

The Permittee shall give notice to the Director, as soon as possible, of any planned physical alterations or additions to the Permitted facility. [MHWMR 270.30(l)(1)]

I.E.11 Reporting Anticipated Noncompliance

The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. [MHWMR 270.30(l)(2)]

I.E.12 Transfer of Permits

This Permit is not transferable to any person, except after notice to the Director. The Director may require modification or revocation and reissuance of the Permit pursuant to MHWMR 270.40. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of MHWMR Parts 264 and 270 and this Permit. [MHWMR 270.30(l)(3), 264.12(c)]

I.E.13 Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

I.E.14 Twenty-Four Hour Reporting

I.E.14.a The Permittee shall report to the Director any noncompliance which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. The report shall include the following:

I.E.14.a.i Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.

I.E.14.a.ii Any information of a release or discharge of hazardous waste, or of a fire or explosion from the hazardous waste management facility which could threaten the environment or human health outside the facility.

I.E.14.b The description of the occurrence and its cause shall include:

I.E.14.b.i Name, address, and telephone number of the owner or operator;

I.E.14.b.ii Name, address, and telephone number of the facility;

I.E.14.b.iii Date, time, and type of incident;

I.E.14.b.iv Name and quantity of materials involved;

I.E.14.b.v The extent of injuries, if any;

I.E.14.b.vi An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and

I.E.14.b.vii Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.14.c A written submission shall also be provided within five days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Director may waive the five-day written notice requirement in favor of a written report within 15 days. [MHWMR 270.30(l)(6)]

I.E.15 Other Non-compliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, Permit Conditions I.E.10-I.E.15., at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition I.E.14 [MHWMR 270.30(l)(10)]

I.E.16 Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the Permit application, or submitted incorrect information in a Permit application or in any report to the Director, the Permittee shall promptly submit such facts or information. [MHWMR 270.30(l)(11)]

I.F. SIGNATORY REQUIREMENT

All applications, reports, or information submitted to or requested by the Director, his designee, or authorized representative, shall be signed and certified by the party submitting the documents in accordance with MHWMR 270.11 and 270.30(k).

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

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

Environmental Permits Division, Chief
Mississippi Office of Pollution Control
P. O. Box 2261
Jackson, Mississippi 39225

I.H. CONFIDENTIAL INFORMATION

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

I.I. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the facility, until post-closure is completed and certify by an independent, registered professional engineer, the following documents and all amendments, revisions and modifications to these documents:

I.I.1 Inspection schedules, as required by MHWMR 264.15(b)(2) and this Permit.

I.I.2 Operating Record, as required by MHWMR 264.73 and this Permit.

I.I.3 Post- Closure Plan, as required by MHWMR 264.118(a) and this Permit.

I.I.4 A copy of the financial assurance mechanism for the facility post-closure care, as required by MHWMR 264.142(d) and 264.144(d) and this permit.

I.I.5 All other documents required by Permit Condition I.E.9

MODULE II- GENERAL FACILITY CONDITIONS

II.A. DESIGN AND OPERATION OF FACILITY

The Permittee shall construct, maintain and operate the facility to minimize the possibility of a 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.B. REQUIRED NOTICES

II.B.1 Hazardous Waste Imports

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

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

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

II.B.3 Transfer of Permit

Before transferring ownership or operation of the facility during its operating life, the owner or operator must notify the new owner or operator in writing of the requirements of MHWMR Parts 264 and 270.

II.C. SECURITY

The Permittee shall comply with the security provisions of MHWMR 264.14(b)(2) and (c) and the Post-Closure Plan, Permit Attachment D.

II.D. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection schedule set out in the Post-Closure Plan, Permit Attachment D. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by MHWMR 264.15(c). Records of inspection shall be kept, as required by MHWMR 264.15(d).

II.E. LOCATION STANDARDS

The Permittee's regulated unit (closed RCRA SI) that is subject of this permit does not lie in the 100 year flood plain.

II.F. RECORD KEEPING AND REPORTING

In addition to the record keeping and reporting requirements specified elsewhere in this Permit, the Permittee shall do the following:

II.F.1 Operating Record

The Permittee shall maintain a written operating record at the facility, in accordance with MHWMR 264.73.

II.F.2 Annual Record

The permittee shall comply with the biennial reporting requirements of MHWMR 264.75.

II.G. GENERAL POST-CLOSURE REQUIREMENTS

II.G.1 Post-Closure Care Period

The Permittee shall begin post-closure care for each surface impoundment after completion of closure of the unit and continue for 30 years after that date. Post-closure care shall be in accordance with MHWMR 264.117 and the Post-Closure Plan, Permit Attachment D.

II.G.2 Post-Closure Security

The Permittee shall maintain security at the facility during the post-closure care period, in accordance with the Post-Closure Plan, Permit Attachment D, and MHWMR 264.117(b).

II.G.3 Amendment to Post-Closure Plan

The Permittee shall amend the Post-Closure Plan in accordance with MHWMR 264.118(d), whenever necessary.

II.G.4 Post-Closure Notices

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

II.G.5 Certification of Completion of Post-Closure Care

The Permittee shall certify that the post-closure care period was performed in accordance with the specifications in the Post-Closure Plan, as required by MHWMR 264.120.

II.H. COST ESTIMATE FOR FACILITY POST-CLOSURE

II.H.1 The Permittee's most recent post-closure cost estimate, prepared in accordance with MHWMR 264.144 is specified in Permit Attachment E.

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 at the facility the latest post-closure cost estimate as required by MHWMR 264.144(d).

II.I. FINANCIAL ASSURANCE FOR FACILITY POST-CLOSURE

The Permittee shall demonstrate continuous compliance with MHWMR 264.145 by providing documentation of financial assurance, as required by MHWMR 264.151 or 264.149, in at least the amount of the cost estimates required by Permit Condition II.I. Changes in financial assurance mechanisms must be approved by the Director pursuant to MHWMR 264.145 or 264.149.

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

The Permittee shall comply with MHWMR 264.148, whenever necessary.

MODULE III – CORRECTIVE ACTION FOR REGULATED UNITS

III.A. MODULE HIGHLIGHTS

The Permittee is required by this module to maintain a groundwater corrective action monitoring system for the closed surface storage impoundments that was used in the treatment of wastewater from the wood preserving process. The groundwater corrective action monitoring system consists of seventeen wells including three point of compliance wells, nine effectiveness wells, and five boundary control wells.

III.B. WELL LOCATION, INSTALLATION AND CONSTRUCTION

The Permittee shall install and maintain a groundwater monitoring system to comply with the requirements specified below: [MHWMR 264.100(d)]

III.B.1 The Permittee shall install and maintain groundwater monitoring wells at the locations specified on the map in Permit Figure 3 and in conformance with the following list: [MHWMR 264.100(a)(3) and (d)]

III.B.1.a Compliance Monitoring Wells

For the purposes of this permit, wells MW-1, MW-2, MW-3 and/or any applicable wells required under Condition III.B.3. shall be designated as Compliance Monitoring Wells.

III.B.1.b Effectiveness Monitoring Wells

For the purposes of this permit, wells MW-6, MW-8, MW-11, MW-13, MW-14, MW-15, MW-16, MW-17, MW-23 and/or any applicable wells required under Condition III.B.3. shall be designated as Effectiveness Monitoring Wells.

III.B.1.c Boundary Control Monitoring Wells

For the purposes of this permit, wells MW-5, MW-19, MW-29, MW-32, MW-33, and/or any applicable wells required under Condition III.B.3. shall be designated as Boundary Control Monitoring Wells.

III.B.1.d Background Monitoring Wells

For the purposes of this permit, wells MW-4 and/or any applicable wells required under Condition III.B.3 shall be designated as the background monitoring well.

III.B.2 Additional Monitoring Wells

Due to changes that may occur in groundwater flow direction under the corrective action program; construction, re-designation, or deletion of wells from the monitoring program may be required.

III.B.3 Replacement Procedure

Should the Permittee determine during an inspection or sampling event that any well identified in Condition III.B. has been damaged such that it no longer meets the requirements of MHWMR 264.97(a) and (c), the Permittee shall notify the Executive Director in writing within seven (7) days of making such a determination and replace or repair the damaged well within thirty (30) days. Replacement wells should be constructed to the same specifications as the well being replaced.

III.B.4 Deletion Procedure

All wells deleted from the system shall be plugged and abandoned in accordance with Mississippi Office of Land and Water Resources regulations. Well plugging and abandonment methods and certification shall be submitted to the Executive Director within thirty (30) days from the date the wells are removed from the monitoring program.

III.C. GROUNDWATER PROTECTION STANDARD

The groundwater protection standards under MHWMR 264.92 shall be equal to the concentration limits under Condition III.D during the corrective action monitoring program. These groundwater protection standards are based on Maximum Contaminant Limits (MCLs) as established in the National Interim Primary Drinking Water

Regulations (NIPDWR) under the Safe Drinking Water Act. In cases where MCLs have not been promulgated, the standard shall be background concentrations or Method Detection Limits (MDLs) or, in the absence of MDLs, Practical Quantitation Limits (PQLs). 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).

III.D. HAZARDOUS CONSTITUENTS AND CONCENTRATION LIMITS

The following constituents are present in the groundwater beneath Closed Surface Impoundments as specified in Attachment B. The groundwater protection standards of Condition III.C shall be based on the indicated concentration limits, as required by MHWMR 264.94. The Permittee shall maintain a corrective action program to ensure that regulated units are in compliance with the groundwater protection standard. The following hazardous constituents and their concentration limits comprise the groundwater protection standard [MHWMR 264.100(a)(1)-(2)]:

Constituent	Concentration Limit (µg/L)[1]	Basis
Acenaphthalene	<MDL	MDL[2]
Acenaphthene	400	SL[3]
Acetophenone	1,500	SL[3]
Aniline	12	MDL
Benz(a)anthracene	<MDL	SL[4]
Benzene	5	MCL
Benzo(a)pyrene	0.2	MCL[4]
Benzo(b)fluoranthene	<MDL	SL[4]
Carbazole	10	MDL
2-Chlorophenol	10	MDL
Chrysene	<MDL	MDL[2]
m-Cresol	<MDL	MDL[2]
o-Cresol	<MDL	MDL[2]
p-Cresol	<MDL	MDL[2]
Dibenz(a,h)anthracene	<MDL	SL[4]
3,3-Dichlorobenzidine	<MDL	SL[4]
2,4-Dimethylphenol	<MDL	MDL[4]

2,4-Dinitrophenol	30	SL[3]
Fluoranthene	630	SL[3]
Fluorene	220	SL[3]
Ideno (1,2,3-c,d)pyrene	<MDL	MDL[2]
Methyl Chloride (chloromethane)	190	SL[3]
Naphthalene	<MDL	SL[4]
Pentachlorophenol	1	MCL
Phenanthrene	<MDL	MCL
Phenol	4,500	SL[3]
2-Picoline	<MDL	MDL[2]
Pyrene	87	SL[3]
2,3,4,5-Tetrachlorophenol	< MDL	MDL[2]
2,3,4,6-Tetrachlorophenol	170	SL[3]
2,4,5-Trichlorophenol	890	SL[3]
2,4,6-Trichlorophenol	< MDL	SL[4]
Toluene	1,000	MCL

[1] Per the analytical methods in the Groundwater Sampling and Analysis Plan found in Attachment C.
[2] The groundwater protection standard shall be less than the MDL (i.e., a Non-Detect result). The MDL should be less than or equal to the LOQ, which is the lower limit of quantitation from Method 8270D of EPA's SW-846 (generally 10 µg/L).
[3] SL = Tapwater screening level from "Regional Screening Levels for Chemical Contaminants at Superfund Sites" as of November 2011.
[4] If the SL is lower than the MDL, the MDL is specified as the groundwater protection standard. A sample result of "Non-Detect" shall indicate compliance with the groundwater protection standards, assuming appropriate test methods and QA/QC procedures are used.

III.E. POINT OF COMPLIANCE

The point of compliance for the waste management units is represented by a vertical surface located at the hydraulically down gradient limit of the waste management area that extends down into the uppermost aquifer underlying the closed surface impoundment. The locations of the point of compliance are depicted in Figure 3.

III.F. COMPLIANCE PERIOD

The compliance period shall continue until the groundwater protection standard for all the constituents specified in Condition III.D have not been exceeded in any compliance

or effectiveness monitoring wells for a period of three consecutive years.

III.G. CORRECTIVE ACTION PROGRAM

The Permittee shall implement the corrective action measures described in the Section 2.20.6 of the Part B renewal application [Attachment B]. The hazardous constituents shall be removed by the use of a groundwater and DNAPL (Dense Non-Aqueous Phase Liquid) extraction wells followed by treatment of recovered groundwater in a wastewater treatment facility with discharge in accordance with the Clean Water Act.

III.G.1 The Permittee shall conduct the corrective action measures specified in this permit until the groundwater protection standard for all constituents has not been exceeded at the point of compliance or in any compliance or effectiveness monitoring wells for a period of three (3) consecutive years.

III.G.2 Upon termination of corrective action measures, the Permittee shall:

III.G.2.a Perform a complete MHWMR 264 Appendix IX analysis on all effectiveness monitoring wells as designated in Condition III.B.1.b to confirm that no hazardous constituents are present in the groundwater; and

III.G.2.b Annually perform a complete MHWMR 264 Appendix IX analysis on all compliance monitoring wells as designated in Condition III.B.1.a to confirm that no hazardous constituents are present in the groundwater.

III.G.3 If corrective action procedures are terminated in accordance with Condition III.G.1., they shall be reinstated any time during the post-closure care period that the groundwater protection standard has been exceeded at the point of compliance.

III.H. LIST OF HAZARDOUS CONSTITUENTS

The Permittee shall conduct corrective action to remove all constituents specified in Condition III.D above the indicated concentration limits in accordance with MHWMR 264.100(a)(1).

III.I. CONCENTRATION LIMITS

The Permittee must continue corrective action to the extent necessary to ensure that the concentration of hazardous constituents in the groundwater must not exceed the groundwater protection standards as specified in Condition III.C, as required under MHWMR 264.94 and MHWMR 264.100(a)(2).

III.J. CORRECTIVE ACTION TO PROPERTY BOUNDARY

The Permittee shall capture, remediate, and monitor contaminated groundwater from the point of compliance to the property boundary, and beyond if applicable, where necessary to protect human health and the environment, as required by MHWMR 264.100(e).

III.K. SAMPLING AND ANALYSIS PROCEDURES

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the ground-water monitoring wells described in Permit Condition III.B: [MHWMR 264.97(d) and (e)]

III.K.1 Prior to collecting groundwater samples from any monitoring well, the Permittee shall measure the water level in the well, calculate the volume of water in the well, and purge the well per the procedures in the Groundwater Sampling and Analysis Plan, Attachment C.

III.K.2 The Permittee shall collect samples in accordance with the procedures set forth in the Groundwater Sampling and Analysis Plan, Attachment C.

III.K.3 Samples shall be preserved in accordance with the procedures in the Groundwater Sampling and Analysis Plan, Attachment C.

III.K.4 Samples shall be shipped in accordance with the procedures in the Groundwater Sampling and Analysis Plan, Attachment C.

III.K.5 Groundwater samples shall be tracked and controlled using the sample identification and chain-of-custody procedures specified in the Groundwater Sampling and Analysis Plan, Attachment C.

III.K.6 Samples shall be analyzed in accordance with the methods specified in the Groundwater Sampling and Analysis Plan, Attachment C.

III.K.7 Appropriate QA/QC measures (field, trip, and equipment blanks and duplicate samples) will be utilized per the Groundwater Sampling and Analysis Plan, Attachment C.

III.L. GROUND-WATER SURFACE ELEVATION

III.L.1 The Permittee shall determine the ground-water surface elevation to the nearest 0.01 foot at each well each time ground water is sampled, in accordance with Permit Condition III.N. [MHWMR 264.97(f)]

III.L.2 The Permittee shall report the surveyed elevation of the monitoring well(s) when the well(s) is (are) installed.

III.M. STATISTICAL PROCEDURES

Only direct comparison between monitoring results and established protection standards are used, so no statistical procedure is necessary.

III.N. MONITORING PROGRAM AND DATA EVALUATION

The Permittee shall establish and implement a ground-water monitoring program to demonstrate the effectiveness of the corrective action program. Ground-water monitoring shall be conducted and shall be as effective as the program for compliance monitoring under MHWMR 264.97 and MHWMR 264.99. The Permittee shall determine ground-water quality as follows:

III.N.1 Monitoring Parameters and Frequencies

The Permittee shall determine the groundwater quality at each monitoring well at the frequency and for the parameters specified below:

WELLS		PARAMETERS	SAMPLING FREQUENCY
MW-1 MW-2 MW-3	Point of Compliance Wells	Groundwater protection constituents underlined in Condition III.D.	Semi-annually
		All groundwater protection constituents listed in Condition III.D	Every five years as required by Condition III. N. 3
		All MHWMR Appendix IX constituents	Within ninety (90) days after meeting the groundwater protection standard
MW-6 MW-8 MW-11 MW-13 MW-14 MW-15 MW-16 MW-17 MW-23	Effectiveness Wells	Groundwater protection constituents underlined in Condition III.D.	Annually
		All MHWMR 264 Appendix IX constituents	Within ninety (90) days after meeting the groundwater protection standards
MW-5 MW-19 MW-29 MW-32 MW-33	Boundary Control Wells	Groundwater protection constituents underlined in condition III.D.	Annually
All		Water level	Each time the wells are sampled

III.N.2 Additional Parameters

If additional MHWMR 264 Appendix IX constituents are found in the compliance and/or effectiveness wells, the Permittee shall:

III.N.2.a Resample the affected well(s) within thirty (30) days and repeat the Appendix IX analysis for the detected constituents, and

III.N.2.b If the presence of Appendix IX constituents is confirmed:

III.N.2.b.i Report the concentration of these additional constituents to the Executive Director within seven (7) days after completion of the analysis, and

III.N.2.b.ii Add these constituents to the monitoring list under Condition III.D.

III.N.2.c The Permittee may elect to bypass the requirements of Condition III.N.2.a.

III.N.3 Additional Monitoring Requirements

During the corrective action monitoring period, a compliance point monitoring well shall be sampled and analyzed twice during the permit term for all of the hazardous constituents (33 total) listed in Condition III.D. One sampling event shall be conducted within the first five (5) years of the permit term and one shall be conducted during the last five (5) years of the permit term. The compliance point monitoring well shall be selected on a rotating basis.

III.O. RECORD KEEPING AND REPORTING

III.O.1 The Permittee shall enter all monitoring, testing, and analytical data obtained in accordance with Permit Condition III.N in the operating record. The data must include all computation, calculated means, variances, and results of the statistical test(s) that the Director has specified. [MHWMR 264.73(b)(6)]

III.O.2 The Permittee shall report on the effectiveness of the corrective action program Annually, as required under MHWMR 264.100(g). These reports shall include, at a minimum:

III.O.2.a Groundwater elevations measured in all monitoring wells;

III.O.2.b Potentiometric maps showing groundwater flow direction;

III.O.2.c Groundwater analyses;

III.O.2.d At least annually, a determination of flow rate; and

III.O.2.e At least annually, isoconcentration maps showing plumes for each monitored constituent and a composite map indicating the total extent of groundwater contamination.

III.O.3 The Permittee shall report, in writing, annually to the Director on the effectiveness of the corrective action program. These reports shall be submitted by January 15 of each year until the corrective action program has been completed. [MHWMR 264.100(g)]

MODULE IV - POST-CLOSURE CARE

IV.A. MODULE HIGHLIGHTS

Post-closure care of the units shall follow the procedures specified in the Post-Closure Plans [Attachment D] and shall continue throughout the effective period of this permit as specified in MHWMR 264.117(a)(1); unless otherwise modified under MHWMR 264.117(a)(2).

IV.B. UNIT IDENTIFICATION

Post-closure care of the units shall follow the procedures specified in the Post-Closure Plans [Attachment D] and shall continue throughout the effective period of this permit as specified in MHWMR 264.117(a)(1); unless otherwise modified under MHWMR 264.117(a)(2).

IV.C. POST-CLOSURE INSPECTION

The Permittee shall inspect the units in accordance with the procedures in the Post-Closure Plan, Attachment D. The Permittee shall remedy any deterioration or malfunction of equipment or structures discovered by an inspection as required by MHWMR 264.15(c). Records of inspections shall be kept as required by MHWMR 264.15(d) and Condition II.D. of this permit.

IV.D. POST-CLOSURE GROUNDWATER MONITORING

Post-closure groundwater monitoring shall be conducted as required by MHWMR 264.117(a), 264.228(b)(3), and according to the procedures described in Module IV and the Groundwater Sampling and Analysis Plan, Attachment C.

IV.E. POST-CLOSURE MAINTENANCE

Maintenance of the cover, drainage control structures, benchmarks, security devices, and all post-closure and corrective action monitoring wells shall be conducted as required by MHWMR 264.117(a)(1)(ii), 264.228(b), and as described below:

IV.E.1 Vegetative Cover

The vegetative cover for the closed units shall be maintained so that it is free of erosion gullies, bare spots, cracking or settlement, burrows, and perennial woody vegetation. Vegetative growth shall not exceed two feet in height. Other maintenance shall take place as required by the Post-Closure Plan, Attachment D.

IV.E.2 Monitoring Wells

The integrity of all monitoring wells shall be maintained. The protective posts and concrete pads shall be free of cracks or other damage and free of debris and standing water.

IV.E.3 Benchmarks

All surveyed benchmarks shall be maintained.

IV.F. POST-CLOSURE PROPERTY USE

Post-closure use of the closed unit must comply with the standards in MHWMR 264.117(c).

IV.G. REMOVAL OF WASTE

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 and/or contaminated soils, then 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).

IV.H. COMPLETION OF POST-CLOSURE CARE PERIOD

No later than sixty (60) days after completion of the established post-closure care period

for a hazardous waste disposal unit, the Permittee shall submit to the Executive Director, by registered mail or other means that establish proof of delivery, 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 an independent, registered professional engineer. Documentation supporting the independent, registered 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).

IV.I. RETENTION OF PLAN

The Permittee shall designate a facility contact person for all regulatory purposes and notify the Executive Director in writing as to where the facility contact person may by reached during regular business hours. The facility contact person shall retain an updated copy of the Post-Closure Plan as specified in MHWMR 264.118(b)(3) and when applicable, 264.118(c).

IV.J. FINANCIAL ASSURANCE

IV.J.1 The Permittee shall maintain financial assurance during the post-closure period and comply with all applicable requirements of MHWMR Part 264 Subpart H. [MHWMR 264.145]

IV.J.2 The Permittee shall demonstrate to the Director that the value of the financial assurance mechanism exceeds the remaining cost of post-closure care, in order for the Director to approve a release of funds. [MHWMR 264.145(a)(10)]

IV.J.3 The Permittee [or any other person authorized to conduct post-closure care] shall submit itemized bills to the Director when requesting reimbursement for post-closure care. [MHWMR 264.145(a)(11)]

IV.K. POST-CLOSURE PERMIT MODIFICATIONS

The Permittee must request a permit modification to authorize a change in the approved Post-Closure Plan. This request must be in accordance with applicable requirements of MHWMR Parts 124 and 270, and must include a copy of the proposed amended Post-

Closure Plan for approval by the 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 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the Post-Closure Plan. [MHWMR 264.118(d)]

MODULE V – WASTE MINIMIZATION

V.A. GENERAL RESTRICTIONS

In the event that the Permittee treats, stores, or disposes of hazardous wastes onsite where such wastes were generated, then the Permittee must comply with MHWMR §264.73(b)(9), and Section 3005(h) of RCRA (42 U.S.C. 6925(h)), and the Permittee must certify, no less often than annually, that:

V.A.1 The Permittee has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable; and

V.A.2 The proposed method of treatment, storage or disposal is the most practicable method available to the Permittee which minimizes the present and future threat to human health and the environment.

V.B. WASTE MINIMIZATION CERTIFICATION OBJECTIVES

Any future waste minimization program under Condition VII.A should include the following elements:

V.B.1 Top Management Support

V.B.1.a Dated and signed policy describing management support for waste minimization and for implementation of a waste minimizing plan.

V.B.1.b Description of employee awareness and training programs designed to involve employees in waste minimization planning and implementation to the maximum extent feasible.

V.B.1.c Description of how a waste minimization plan has been incorporated into management practices so as to ensure ongoing efforts with respect to product design, capital planning, production operations and maintenance.

V.B.2 Characterization of Waste Generation

Identification of types, amounts and hazardous constituents of waste streams with the source and date of generation.

V.B.3 Periodic Waste Minimization Assessments

V.B.3.a Identification of all points in a process where materials can be prevented from becoming a waste, or can be recycled.

V.B.3.b Identification of potential waste reduction and recycling techniques applicable to each waste, with a cost estimate for capital investment and implementation.

V.B.3.c Specify performance goals, preferably quantitative, for the source reduction of waste by stream. Whenever possible, goals should be stated as weight of waste generated per standard unit of production, as defined by the generator

V.B.4 Cost Allocation System

Identification of waste management costs for each waste, factoring in liability, transportation, recordkeeping, personnel, pollution control, treatment, disposal, compliance and oversight to the extent feasible.

V.B.4.a Description of how departments are held accountable for the wastes they generate.

V.B.4.b Comparison of waste management costs with costs of potential reduction and recycling techniques applicable to each waste.

V.B.5 Technology Transfer

Description of efforts to seek and exchange technical information on waste minimization from other parts of the company, other firms, trade associations, technical assistance programs, and professional consultants.

V.B.6 Program Evaluation

V.B.6.a Description of types and amounts of hazardous waste reduced or recycled.

V.B.6.b Analysis quantification of progress made relative to each performance goal established and each reduction technique to be implemented.

V.B.6.c Amendments to waste minimization plan and explanation.

V.B.6.d Explanation and documentation of reduction efforts completed or in progress before development of the waste minimization plan.

V.B.6.e Explanation and documentation regarding impediments to hazardous waste reduction specific to the individual facility.

V.C. RECORDKEEPING AND REPORTING

V.C.1 Annually, the Permittee shall submit a certification report of the types and quantities of waste generated, and the types and quantities of waste reduced/minimized. This certified report shall include a narrative study explaining the waste generated and minimization data, a description of goals and progress made in reducing/minimizing the generation of wastes, and a description of any impediment to the reduction and minimization of waste.

V.C.2 The Permittee shall maintain copies of this certification in the facility operating record as required by MHWMR 264.73.

MODULE VI – RCRA ORGANIC AIR EMISSIONS REQUIREMENTS

VI.A. PROCESS VENTS

VI.A.1 MHWMR Part 264, Subpart AA contains emission standards for process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, and air or steam stripping operations that process hazardous waste with an annual average total organic concentration of at least ten (10) parts per million (ppm) by weight, except as provided for in MHWMR 264.1 and 264.1034 (d) and (e).

VI.A.2 The requirements of this Condition apply to hazardous waste management units for which required control equipment has been installed or are exempt from MHWMR Part 264 Subpart AA standards.

VI.A.3 Prior to constructing any equipment with process vents subject to the requirements of MHWMR 264, Subpart AA, the Permittee shall apply for a permit modification under MHWMR 270.42, and provide specific Part B application information required under MHWMR 270.14 through 270.17 and 270.24, as applicable, with the modification request.

VI.B. EQUIPMENT LEAKS

VI.B.1 MHWMR Part 264, Subpart BB contains emission standards that address leaks from specific equipment (i.e. pumps, valves, compressors, etc.) that contains or contacts hazardous waste that has an organic concentration of at least ten (10) percent by weight, except as provided for in MHWMR 264.1, 264.1064(k), or 264.1050(e).

VI.B.2 The requirements of this Condition apply to hazardous waste management units for which required control equipment has been installed or are exempt from MHWMR Part 264 Subpart BB standards.

VI.B.3 Prior to constructing or installing any equipment subject to the requirements of MHWMR 264, Subpart BB, the Permittee shall apply for a permit modification under MHWMR 270.42, and provide specific Part B application information required under MHWMR 270.14 through 270.17 and 270.25, as applicable, with the modification request.

VI.C. TANKS, SURFACE IMPOUNDMENTS, OR CONTAINERS

VI.C.1 MHWMR Part 264 Subpart CC applies to all tanks, containers and surface impoundments identified in this Permit, except as provided for in MHWMR 264.1 and 264.1080(b).

VI.C.2 The requirements of this Condition apply to hazardous waste management units for which required control equipment has been installed or are exempt from MHWMR Part 264 Subpart CC standards under MHWMR 264.1082(c).

VI.C.3 Prior to installing any tank, container, surface impoundment or miscellaneous unit subject to MHWMR Part 264, Subpart CC, or modifying an existing process, waste handling activity, or tank or container such that the unit(s) will become subject to MHWMR Part 264 Subpart CC, the Permittee shall apply for a permit modification under MHWMR 270.42, and provide specific Part B application information required under MHWMR 270.14 through 270.17 and 270.27, as applicable, with the modification request.

MODULE VII – PHASE II RCRA ORGANIC AIR EMISSION

VII.A GENERAL INTRODUCTION

On December 6, 1994, EPA published the final rule for Phase II Organic Air Emissions Standards (40 CFR Parts 264 and 265, Subpart CC) for hazardous waste treatment, storage, and disposal facilities, including certain hazardous waste generators accumulating waste on-site in RCRA permit-exempt (90-day) tanks and containers. In general, under these standards air emissions controls must be used for tanks, surface impoundments, containers and miscellaneous units which contact hazardous waste containing an average organic concentration greater than 500 ppmw at the point of origination determined by the procedures outlined in 40 CFR § 264.1083(a), except as specifically exempted under 40 CFR § 264.1080 and § 264.1082.

VII.B ORGANIC AIR EMISSION STANDARDS

Prior to installing any tank, container, surface impoundment or miscellaneous unit subject to 40 CFR Part 264, Subpart CC, or modifying an existing process, waste handling or tank or container such that the unit(s) will become subject to 40 CFR Part 264 Subpart CC, the Permittee shall apply for a permit modification under § 270.42, and provide specific Part B application information required under 40 CFR §§ 270.14-17 and § 270.27, as applicable, with the modification request.

MODULE VIII -LAND DISPOSAL RESTRICTIONS

VIII.A. GENERAL RESTRICTIONS

MHWMR Part 268 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage or disposal unit. The Permittee shall maintain compliance with the requirements of MHWMR Part 268. Where the Permittee has applied for an extension, waiver or variance under MHWMR Part 268, the Permittee shall comply with all restrictions on land disposal under this Part once the effective date for the waste has been reached pending final approval of such application.

VIII.B. LAND DISPOSAL PROHIBITIONS AND TREATMENT STANDARDS

VIII.B.1 A restricted waste identified in MHWMR Part 268 Subpart C may not be placed in a land disposal unit without further treatment unless the requirements of MHWMR Part 268 Subparts C and/or D are met.

VIII.B.2 The storage of hazardous wastes restricted from land disposal under MHWMR Part 268 is prohibited unless the requirements of MHWMR Part 268 Subpart E are met.

ATTACHMENT A

RCRA Part A Application

SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.

United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (See Instructions on page 14.)

MARK ALL BOX(ES) THAT APPLY

Reason for Submittal:

- ☐ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☐ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☑ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # 2 (2nd renewal))
- ☐ As a component of the Hazardous Waste Report

2. Site EPA ID Number (page 15)

EPA ID Number: MSD021019914

3. Site Name (page 15)

Name: American Wood - Division of Powe Timber

4. Site Location Information (page 15)

Street Address: Highway 15 North

City, Town, or Village: Richton | State: MS

County Name: Perry | Zip Code: 39476

5. Site Land Type (page 15)

Site Land Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

6. North American Industry Classification System (NAICS) Code(s) for the Site (page 15)

A. 321114 | B. | C. | D.

7. Site Mailing Address (page 16)

Street or P. O. Box: P. O. Drawer 1617

City, Town, or Village: Richton

State: MS

Country: United States of America | Zip Code: 39476

8. Site Contact Person (page 16)

First Name: M. J. | MI: | Last Name: Beal

Phone Number: (601) 788-6564 | Extension: | Email address: cbeal.americanwood@megagate.com

9. Operator and Legal Owner of the Site (pages 16 and 17)

A. Name of Site's Operator: American Wood - Division of Powe Timber | Date Became Operator (mm/dd/yyyy): 03/31/1980

Operator Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Legal Owner: American Wood - Division of Powe Timber | Date Became Owner (mm/dd/yyyy): 03/31/1980

Owner Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

9. Legal Owner (Continued) Address	Street or P. O. Box: P. O. Box 1532	
	City, Town, or Village: Hattiesburg	
	State: MS	
	Country: United States of America	Zip Code: 39403

10. Type of Regulated Waste Activity
Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 18 to 21.)

A. Hazardous Waste Activities
Complete all parts for 1 through 6.

Y ☑ N ☐ **1. Generator of Hazardous Waste**
If "Yes", choose only one of the following - a, b, or c.

- ☑ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☑ d. United States Importer of Hazardous Waste

Y ☐ N ☑ e. Mixed Waste (hazardous and radioactive) Generator

Y ☐ N ☑ **2. Transporter of Hazardous Waste**

Y ☐ N ☑ **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

Y ☐ N ☑ **4. Recycler of Hazardous Waste (at your site)**

Y ☐ N ☑ **5. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark each that applies.
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☑ **6. Underground Injection Control**

B. Universal Waste Activities

Y ☐ N ☑ **1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:**

	Generate	Accumulate
a. Batteries	☐	☐
b. Pesticides	☐	☐
c. Thermostats	☐	☐
d. Lamps	☐	☐
e. Other (specify) _____	☐	☐
f. Other (specify) _____	☐	☐
g. Other (specify) _____	☐	☐

Y ☐ N ☑ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities
Mark all boxes that apply.

Y ☐ N ☑ **1. Used Oil Transporter**
If "Yes", mark each that applies.
- ☐ a. Transporter
- ☐ b. Transfer Facility

Y ☐ N ☑ **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark each that applies.
- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☑ **3. Off-Specification Used Oil Burner**

Y ☐ N ☑ **4. Used Oil Fuel Marketer**
If "Yes", mark each that applies.
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 22.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

F034	F035	K001				

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 22.)

This Part A is submitted as part of a post-closure permit renewal application. The regulated units were closed in 1987. No treatment , storage, or disposal of hazardous waste requiring a permit is conducted at this facility, so information concerning processes, design capacity, and annual quantities are not applicable.

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11).
(See Instructions on page 22.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
William A Powe	William A. Powe, Jr., President	8/31/09

EPA ID NO: MSD021019914

OMB #: 2050-0034 Expires 11/30/2005

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 23)	First Name: M. J.	MI:	Last Name: Beal
	Phone Number: (601) 788-6564		Phone Number Extension:
2. Facility Permit Contact Mailing Address (See instructions on page 23)	Street or P.O. Box: P. O. Drawer 1617		
	City, Town, or Village: Richton		
	State: MS		
	Country: United States of America		Zip Code: 39476
3. Operator Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: P. O. Box 1532		
	City, Town, or Village: Hattiesburg		
	State: MS		
	Country: United States of America	Zip Code: 39403	Phone Number (601) 545-7600
4. Legal Owner Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: P. O. Box 1532		
	City, Town, or Village: Hattiesburg		
	State: MS		
	Country: United States of America	Zip Code: 39403	Phone Number (601) 545-7600
5. Facility Existence Date (See Instructions on page 24)	Facility Existence Date (mm/dd/yyyy): 06/01/1965		

6. Other Environmental Permits (See Instructions on page 24)

A. Permit Type (Enter code)	B. Permit Number	C. Description
R	HW-89-914-01	Hazardous Waste Post-Closure
R	MSD021019914	HSWA Permit
N	MSR220011	NPDES Stormwater
E	MSP0901080	State Pretreatment

7. Nature of Business (Provide a brief description; see instructions on page 24)

Wood treating facility producing treated lumber, plywood, poles, and piling utilizing the preservatives creosote and CCA. No hazardous waste treatment, storage, or disposal requiring a permit is done at this site. There are closed hazardous and solid waste landfills at the site which require post-closure care.

8. Process Codes and Design Capacities (See instructions on page 24) - Enter information in the Sections on Form Page 3.

A. PROCESS CODE - *Enter the code from the list of process codes in the table below that best describes each process to be used at the facility. Fifteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), enter the process information in Item 9 (including a description).*

B. PROCESS DESIGN CAPACITY- *For each code entered in Section A, enter the capacity of the process.*

1. **AMOUNT** - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*
2. **UNIT OF MEASURE** - *For each amount entered in Section B(1), enter the code in Section B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units for each corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure in Code Table Below
	Storage:	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S03	Waste Pile	Cubic Yards or Cubic Meters
	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards
S06	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure in Code Table Below
	Treatment:	
T01	Tank Treatment	Gallons Per Day; Liters Per Day
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Treatment (continued):	
T81	Cement Kiln	For T81-T93:
T82	Lime Kiln	
T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds
T84	Phosphate Kiln	Per Hour; Short Tons Per Hour; Kilograms
T85	Coke Oven	Per Hour; Metric Tons Per Day; Metric
T86	Blast Furnace	Tons Per Hour; Short Tons Per Day; Btu Per
T87	Smelting, Melting, or Refining Furnace	Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure in Code Table Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
[illegible]	L
[illegible]ers Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R
Million Btu Per Hour	X

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu Per Hour	I

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. (2) Unit of Measure (Enter code)	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	D	8	0	CLOSED . N/A	N/A	002	
	2				.			
	3				.			
	4				.			
	5				.			
	6				.			
	7				.			
	8				.			
	9				.			
1	0				.			
1	1				.			
1	2				.			
1	3				.			
1	4				.			
1	5				.			

NOTE: If you need to list more than 15 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (*See instructions on page 25 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes*)

Line Number (Enter #s in sequence with Item 8)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. (2) Unit of Measure (Enter code)	C. Process Total Number of Units	D. Description of Process
X	2	T	0	4	100.000	U	001	In-situ Vitrification
					.			
N/A								
					.			
					.			
					.			
					.			

10. Description of Hazardous Wastes (See Instructions on page 25) - Enter information in the Sections on Form Page 5.

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in Section A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Section A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in Section B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Section A, select the code(s) from the list of process codes contained in items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the listed hazardous wastes.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in Section A, select the code(s) from the list of process codes contained in items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of Item 10.D(1).*
3. *Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in Section A. On the same line complete Sections B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In Section A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Section D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									(2) PROCESS DESCRIPTION- (If a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

10. Description of Hazardous Wastes (Continued. Use the Additional Sheet(s) as necessary; number pages as 5 a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K001	0	P	N/A	UNIT IS CLOSED
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					
34					
35					
36					
37					
38					

11. Map (See instructions on pages 25 and 26)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

12. Facility Drawing (See instructions on page 26)

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 26)

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments (See instructions on page 26)

This Part A is submitted as part of a post-closure permit renewal application. The regulated units were closed in 1987. No treatment, storage or disposal of hazardous waste requiring a permit is conducted at this facility, so information concerning processes, design capacity, and annual quantities are not applicable.

The map, facility drawing, and photographs are included as exhibits in the renewal application.

AMERICAN WOOD – PHOTOGRAPHS OF HAZARDOUS WASTE MANAGEMENT UNITS

CLOSED IMPOUNDMENTS AND CAPPED OLD PROCESS AREA, LOOKING WEST

CLOSED IMPOUNDMENT AND CAPPED OLD PROCESS AREA, LOOKING NORTH

HMR

H. M. ROLLINS CO., INC.
GULFPORT, MISSISSIPPI

ATTACHMENT B

RCRA Part B Application

1.0 INTRODUCTION

American Wood, a Division of Powe Timber Company, Inc., (American Wood) was issued a Mississippi Hazardous Waste Permit, Number HW-89-914-01, by the Mississippi Department of Environmental Quality (MDEQ) on August 24, 1989. This permit was reissued on March 27, 2000, and provides for the post-closure care of the closed hazardous waste impoundments and for remediation of the groundwater contamination that exists at the site.

This application for renewal of the Post-Closure Permit Application (PCPA) is intended to meet the requirements of the existing permit listed in Condition I.E.2, Duty to Reapply.

This site has completed 20 years of post-closure care. Conditions at the site are stable and therefore it is not anticipated that reissuance of the permit for the third 10-year permit cycle will result in any significant changes to permit conditions. In the application and associated plans, American Wood is requesting three minor changes from the present permit conditions. The first requested change is to set the frequency of the submittal of Corrective Action Effectiveness reports as annually, to agree with the regulations at MHWMR 264.100(g) which have been changed to an annual reporting requirement. The second change is to request the sampling frequency of boundary wells be changed to annual instead of the present semiannual. The corrective action system has been operating for 17 years, and it has been demonstrated that the plume is not expanding. Given the site history, annual sampling should be more than adequate. The third requested change is to remove wells MW-31 and MW-25 from the list of boundary wells and to remove well MW-30 from the effectiveness wells list. Well MW-31 is now within a few feet of a recently constructed residence and sampling activities can be disruptive to the occupant. Monitoring well MW-25 is located on property not owned by American

Wood and the property owner has recently requested the removal of this well in order to construct a building. The original legal agreement between the owner and American Wood gives the property owner the right to request the removal of the well from the property. Neither MW-25 or MW-31 has ever shown any contamination and other boundary wells in this area are already in place, such as well MW-32, located just downgradient from recovery well RW-3, which would provide early warning of any future migration. Additionally, boundary wells MW-33 and MW-29 provide adequate data on potential migration at the periphery of the leading edge, making the monitoring of MW-25 and MW-31 unnecessary. The monitoring of effectiveness well MW-30 is unnecessary because of its very close proximity to RW-3, which is already sampled on a monthly basis.

1.1 Facility Background and History

American Wood operates a wood preserving facility (SIC 2491, NAICS 321114) on a 26-acre site located adjacent of the Town of Richton, in Perry County, Mississippi. Some additional adjacent property to the west and north has been acquired, but this property is not used for plant activities. The site location and topography are shown on the partial USGS map included in Exhibit 1.

The original wood preserving plant was built in 1965, and has operated since that time under two owners. A new enclosed plant has been constructed, and the original plant was dismantled and closed in accordance with an approved closure plan in 1997. The primary product produced at this facility had been wood flooring blocks used in heavy manufacturing industrial floors. Creosote had been the major wood preservative used. Pentachlorophenol dissolved in a heavy petroleum distillate was intermittently used until 1989. Current operations include the treatment of plywood, lumber, timbers, poles, and piling with chromated

blocks, timbers, piling, posts, poles, and rail road products with creosote in the second cylinder.

The plant historically used four very small surface impoundments to manage its process wastewater. These impoundments occupied a total area of less than ¼ acre. The impoundments were closed as hazardous waste management units (HWMU) in 1987. The locations of these closed impoundments is shown on the site drawing in Exhibit 2.

Groundwater quality investigations conducted by American Wood revealed that the upper aquifer under the impoundments contained traces of creosote and pentachlorophenol constituents. A thorough investigation of the groundwater contamination was completed, and a Groundwater Quality Assessment report was submitted by American Wood in February 1988.

A Corrective Action Plan (CAP) was submitted in June 1988 and modified in May 1989. The plan was approved by the MDEQ and incorporated into the Hazardous Waste Management (HWM) Permit issued to American Wood in August 1989. The CAP was designed to "capture" and remove the contaminant plume by pumping groundwater from the affected aquifer at a rate calculated to create a hydraulic "capture zone," which would extract the full extent of the contaminant plume and prevent further migration.

The CAP was implemented as required in the HWM permit, and groundwater pumping began in March of 1992. One recovery well was relocated in 1993. Over 510,000,000 gallons of water have been recovered and treated since 1992.

American Wood was also issued a Hazardous and Solid Waste Amendments (HSWA) permit by the U.S. Environmental Protection Agency (EPA) on September 22, 1989, effective September 22, 1989. This permit required investigations of certain Solid Waste Management Units (SWMUs) which were not associated with hazardous waste activities. These investigations were conducted in accordance with an approved plan, and a Report of RCRA Facility Investigation (Draft) dated October 30, 1992, was submitted to the EPA and the MDEQ. Following comments by the regulatory agencies, a Final Report of RCRA Facility Investigation, dated April 19, 1994, was submitted. This report was approved by the EPA on October 3, 1996.

The Final Report of RCRA Facility Investigation contained some proposed corrective measures which were approved by the EPA and which were to be incorporated into a revision of the HSWA permit to be initiated by the EPA. This permit modification has never been made. The corrective measures included capping of certain manufacturing process areas as described in a closure plan approved by the MDEQ and the EPA; the installation of additional fencing to improve site security and prevent unknowing entry onto the site; and establishing administrative control over certain SWMU areas to include filing of survey plats and deed notations restricting future site use. Although EPA has never modified the HSWA permit to include the corrective actions, American Wood has completed these activities.

1.2 Known Incompleteness Items

This application is for the renewal of an existing permit concerning the post-closure management of hazardous and solid waste units at this site. Many of the

information requirements necessary for operating permits are not applicable to a permit for post-closure care. There are no known items of incompleteness in this permit application. An Information Requirements Checklist is found in Exhibit 3.

1.3 Owner-Operator Certification

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

8/31/09
Date

William A. Powe
William A. Powe, Jr., President
American Wood, a Division of
Powe Timber Company, Inc.
Richton, MS

2.0 GENERAL PERMITTING REQUIREMENTS

Permitting requirements for hazardous waste management facilities are found in MHWMR Part 270. The general application requirements are listed at MHWMR 270.10. These requirements include the requirement for permitted facilities to submit a new application at least 180 days before the expiration date of the effective permit; the requirement to keep all data used in the permit application for at least three years after the date the application is signed; and the requirement that owners/operators of surface impoundments or landfills submit information regarding the potential for public exposure to hazardous wastes or hazardous constituents through releases related to these units. American Wood believes this application was submitted within the required time period and acknowledges its record keeping responsibility. An Exposure Information Report is found in Exhibit 20.

The regulations state that the permit application consists of two parts: Part A and Part B. The specific information requirements for Part A are found in MHWMR 270.13, and the specific information requirements for Part B are found at MHWMR 270.14 through 270.25. As previously stated, some of the information requirements for a permit to operate an active hazardous waste facility are clearly not needed or applicable for the renewal of an existing permit to provide post-closure care. The information items considered to be not applicable to this application are so noted.

An amended Part A permit application is found in Exhibit 4. The specific information requirements for the Part B application are addressed in the following sections.

2.1 General Facility Description - 270.14(b)(1)

A general description of this facility is found in section 1.1 of the application.

2.2 Waste Analysis and Characterization - 270.14(b)(2)

This application is for renewal of a permit to provide post-closure care to hazardous waste management units closed as landfills. No additional hazardous waste activities requiring a permit are conducted on site. The waste disposed of in the landfills was K001, and that waste was characterized in the approved closure plans as well as in the EPA background document supporting the K001 waste listing. The K001 constituent list and their chemical and physical properties are found in Exhibit 23. The waste analysis and characterization requirement is not applicable to this application.

2.3 Waste Analysis Plan - 270.14(b)(3)

As stated in 2.2 above, this requirement is not applicable to this application.

2.4 Security Measures - 270.14(b)(4)

The provisions of 270.14(b)(4) reference the requirements at MHWMR 264.14. At that reference, the requirements for closed units are listed as those found at 264.117. At that reference, security may be required during the post-closure period when hazardous wastes may remain exposed after closure or when access by the public or domestic livestock may pose a threat to human health. The closure of the hazardous waste units included a clay cap and soil cover approximately three feet thick. No

hazardous wastes remain exposed, and access by the public or domestic livestock would not pose a threat to human health. There should be no regulatory requirement for security measures at this site.

However, at the request of the MDEQ, the closed hazardous and solid waste units are enclosed within a barbed-wire fence. That fence is marked with warning signs at appropriate intervals. American Wood has also constructed a fence around the entire property at all locations where there could be easy public access, as a solid waste management unit corrective action, in addition to purchasing land beyond the active facility boundary to use as a buffer zone.

2.5 General Inspection Schedule - 270.14(b)(5)

Inspections conducted as part of the post-closure care of the closed impoundments are described in the Post-Closure Plan found in Exhibit 5 of this application. No other permitted activities are conducted at this site.

2.6 Preparedness, Prevention and Contingency Plan Requirements - 270.14(b)(6)and(7)

The regulated units at this site are closed as landfills, and preparedness and prevention and contingency plans are not applicable to closed units. A preparedness and prevention plan, as well as a contingency plan, for the on-site generation of hazardous wastes, are included as Exhibit 7.

2.7 Operating Hazard Prevention Procedures - 270.14(b)(8)

These requirements are not applicable to this facility.

2.8 Procedures for Incompatible, Reactive or Ignitable Wastes - 270.14(b)(9)

This facility never handled these categories of wastes. This facility is closed and does not manage these wastes. These requirements are not applicable.

2.9 Traffic Control - 270.14(b)(10)

This is a closed facility which does not receive any quantity of hazardous wastes. Wastes presently generated on-site are shipped within 90-days of generation using a licensed hazardous waste transporter, generally in less-than-truckload quantities.

2.10 Location Information - 270.14(b)(11)

This facility is located in Mississippi. No political jurisdiction in Mississippi is listed in Appendix VI of 40 CFR Part 264. No further information regarding seismic standards is required.

A Flood Hazard Boundary Map is included as Exhibit 6. The operating portions of the facility are not located within the 100-year flood plain.

2.11 Training Outline - 270.14(b)(12)

There are no known training requirements for post-closure care. The hazardous waste generator training program for the facility is found at Exhibit 8.

2.12 Closure Plan/Post-Closure Plan - 270.14(b)(13)

There is no requirement for a closure plan for a closed unit. The Post-Closure Plan is found in Exhibit 5. That plan describes the post-closure care, maintenance and monitoring activities being conducted at this site.

2.13 Documentation of Required Notices - 270.14(b)(14)

Copies of the required post-closure notices are found in Exhibit 9. In addition, in order to resolve solid waste management unit issues associated with the old plant process area, this area was surveyed and a deed notice was provided for this area. A copy of the survey plat and deed notations covering the treating plant process area are also included in the exhibit.

2.14 Closure Cost Estimate - 270.14(b)(15)

The hazardous waste units are closed, and these requirements are not applicable.

2.15 Post-Closure Cost Estimate - 270.14(b)(16)

An updated post-closure cost estimate is found in Exhibit 10. This estimate covers the costs associated with providing post-closure care for the remaining 10 years of

the post-closure care period. A Post-Closure Plan is included in Exhibit 5. Post-closure costs should now be known with reasonable certainty. The post-closure cost estimate only includes compliance point monitoring. The corrective action cost estimate, located in Exhibit 22, has been revised based on the change in monitoring frequency for boundary wells requested in the renewal application.

Financial assurance for post-closure care is provided by a trust fund. A copy of the financial assurance documentation is found in Exhibit 11.

2.16 Insurance Requirements - 270.14(b)(17)or(18)

These requirements are not applicable to a closed facility.

2.17 Topographic Map of the Facility - 270.14(b)(19)

A site drawing, which includes surface topography and other relevant requirements of the referenced regulation, can be found in Exhibit 2. No wind rose is shown because all units are closed and air emissions are not present.

2.18 Compliance with Other Federal Statutes - 270.14(b)(20)

This application for renewal of the existing post-closure permit does not appear to be in conflict with applicable provisions of:

- Wild and Scenic Rivers Act
- National Historical Preservation Act of 1966
- Endangered Species Act

- Coastal Zone Management Act
- Fish and Wildlife Coordination Act

2.19 Case-by-Case Extension - 270.14(b)(21)

This section is not applicable.

2.20 Additional Information Requirements - 270.14(c)

This section will provide the required information regarding groundwater conditions at this facility. The information presented has been extracted from data previously submitted to the MDEQ and/or the EPA unless otherwise stated.

During the original permitting process, American Wood performed a detailed assessment of groundwater quality which was reported in the Groundwater Quality Assessment (GQA) Vol. I - III, dated February 19, 1988. A Corrective Action Plan (CAP) dated June 21, 1988, revised May 9, 1989, was prepared. Both of these documents were used in the preparation of the existing permit. Groundwater remediation activities began in March of 1992. Additional groundwater investigations were performed in 1992. These investigations were reported in the Request to Modify the RCRA Post-Closure Permit (RMPCP) dated November 25, 1992. That report was accepted, and the post-closure permit and corrective action plan were modified on March 9, 1993. The modified corrective action program has been operational since that time. Corrective Action Effectiveness Reports (CAER) have been submitted to the MDEQ semiannually beginning in July of 1992. American Wood is requesting that the reporting frequency be changed in

the permit to annually to agree with the current requirements in MHWMR 264.100(g).

2.20.1 Summary of Interim Status Monitoring - 270.14(c)(1)

Interim status monitoring identified and delineated a plume of groundwater contamination. The source of the contamination was four very small impoundments used for the management of wood preserving wastewaters. The total area of the four impoundments was less than ¼ acre. The hazardous waste formed in the impoundments was K001, bottom sediment sludge from the treatment of wastewaters from wood preserving processes using creosote and/or pentachlorophenol. The constituents of concern were those contaminants listed in 40 CFR Part 261, Appendix VII, as the basis for listing for hazardous waste K001. A copy of that list and certain chemical and physical characteristics of these compounds is located in Exhibit 23.

Twenty-eight monitoring wells were installed during the interim status period. Each of these wells was analyzed at least once for the K001 list of compounds. The results of these analyses are found in Exhibit 24.

Two wells immediately downgradient from the closed units were selected to represent the most highly contaminated wells. Samples from these wells were analyzed for the list of contaminants found at 40 CFR 264 Appendix IX. Summary results of these analyses are found in Exhibit 15.

Five additional monitoring wells were installed during the additional investigation conducted in 1992. Analytical results from these wells are found in the RMPCP and in Exhibit 16.

In the post-closure permit, the groundwater monitoring requirements call for periodic monitoring of compliance wells, effectiveness wells, and boundary wells. Samples from these wells are analyzed for six of the K001 compounds which were found most frequently in the interim status monitoring. The results of these analyses are found in Exhibit 16.

All monitoring wells were installed in accordance with approved plans, and the full details of the drilling, installation, and construction have been previously submitted. A drawing showing the typical monitoring well construction used at this site is found in Exhibit 13. A list of monitoring well depths, construction materials, and measuring point elevations is located in the Groundwater Sampling and Analysis Plan found in Exhibit 14.

2.20.2 Uppermost Aquifer Information - 270.14(c)(2)

The upper most aquifer at this site is in the Citronelle formation of Pliocene age and in terrace deposits of reworked Citronelle material. These deposits overlie the undifferentiated Hattiesburg and Pascagoula formations of Miocene age. The Citronelle/terrace deposits found during these investigations generally consisted of a lean, silty, sandy clay stratum at land surface ranging in thickness from 8 to 12 feet, which then grade to clayey sands and then to medium to coarse gravelly sands with interbedded clay layers and strata. In all borings underlying and downgradient of the

contaminant plume, the Citronelle/terrace deposits were found to overlie a massive continuous bed of light gray clay described as fat in some samples and as lean in others. An intact sample of this clay was tested for permeability. The reported result was a permeability of 1.68×10^{-8} cm/sec. This upper Miocene clay stratum was reported to be 98 feet thick at the location of the town well, which is 0.6 miles southeast of the site. Geologic cross-sections through the area of this investigation are found in Exhibit 17.

Groundwater occurs in the Citronelle/terrace deposits under water table (phreatic) or semi-confined conditions. Water elevations have shown changes of approximately three feet as a result of rainfall and recharge. The top of the water table ranges from approximately 19 feet below land surface near the closed impoundments, to as little as 2 feet below land surface at MW-27, southeast of the site.

The Citronelle/terrace deposits in the area of these investigations ranged in thickness from 15 feet or less along the western edge of the investigation area to 120 feet in areas east and southeast of the site. In all areas, these deposits rest on a light gray massive clay which is believed to be the Miocene contact. In the northwest portion of the investigation area, the Miocene appears to be dipping at an angle of 15 to 20 degrees to the east to a depth of 120 feet where it becomes fairly flat and undulating. At the location of the groundwater recovery well RW-2, the Citronelle/terrace deposits were found to a depth of 91 feet. The static water level was approximately 20 feet below land surface, leaving an aquifer thickness of 71 feet. At the location of RW-3, the leading edge recovery well, the Citronelle/terrace deposits were found to a depth of 93 feet. The static water level was approximately eight

feet below land surface, leaving an aquifer thickness of 85 feet. A conservative value of 90 feet was used in quantitative calculations at the site.

Groundwater flow directions and gradients have been analyzed numerous times using measured groundwater elevations and three-point analyses. The groundwater flow direction has consistently been toward the southeast, in the direction of Thompson's Creek. The gradient has generally remained between 0.0012 and 0.0016. An equipotential drawing and groundwater elevation tables are found in Exhibit 18.

Hydraulic conductivity of the uppermost aquifer was estimated during the previous investigations by performing single well bail/slug tests on 21 wells and by methods using grain size distribution (GQA and RMPCP). The conductivity values ranged from 0.6 ft/day at MW-16 to 261 ft/day at MW-21. The weighted average value from 33 bail tests performed on 21 wells was 82 ft/day. The average value from three slug tests performed on three wells was 91 ft/day. The average value based on five grain-size analyses from samples from four wells was 30 ft/day. To account for the variability and to provide a conservative design, the corrective action system was designed using an estimated value of 150 ft/day for the hydraulic conductivity of the uppermost aquifer.

Based on visual examinations of samples of aquifer material and published values, the porosity of the aquifer was estimated to be 0.35. Using the site values, the estimated groundwater linear velocity was calculated to be 0.60 ft/day (GQA, page 29). The most recent analysis from the January 2009

Corrective Action Effectiveness Report calculated a gradient of 0.0016 ft/ft and a linear velocity of 0.69 ft/day.

The uppermost aquifer is not used for drinking water in the local area. The land overlying the contaminant plume is within the incorporated limits of the Town of Richton, and residents are supplied from the public water system operated by the Town. The location of the closest Town well is shown on the drawing in Exhibit 2. This well is screened at a depth of 618 feet to 643 feet below land surface. The boring log and geophysical logs of the test hole for this well clearly indicate the presence of the upper Miocene clay stratum with a thickness of 98 feet, which is underlain by two additional strata described as clay with a combined thickness of more than 100 feet. Copies of these logs are included in Exhibit 19. Information on other known groundwater withdrawal wells within three miles of the site is also found in Exhibit 19, along with an overlay of local wells and a USGS map.

2.20.3 Topographic Map Requirements - 270.14(c)(3)

The drawings in Exhibit 2 show the property boundary, the location of the closed waste management areas, the "point of compliance" and groundwater monitoring and recovery wells. A groundwater equipotential drawing and water level elevation table are presented in Exhibit 18. Annual gradient, linear flow velocity, and direction calculations are presented each January in the facility's Corrective Action Effectiveness Report.

2.20.4 Description of Groundwater Contamination Plume - 270.14(c)(4)

The source of the groundwater contamination plume was the small hazardous waste impoundments which are now closed. The vertical extent of the contamination is limited to the Citronelle/terrace deposits. In the immediate downgradient vicinity of the closed impoundments, there were small pockets of a dense non-aqueous phase liquid (DNAPL) resembling creosote. The DNAPL product has appeared to be relatively immobile. The soluble plume has migrated toward the southeast and the areal extent of contamination is shown on the drawing in Exhibit 12.

The groundwater contaminants are those associated with the wood preservative chemicals, creosote and pentachlorophenol, and the list of the specific analytes used during groundwater quality investigations is found in Exhibit 23. The summaries of the Appendix IX analyses done on two highly contaminated wells at the compliance point are found in Exhibit 15. The current post-closure permit requires monitoring for the compounds 2,4-dimethylphenol, pentachlorophenol, naphthalene, acenaphthalene, fluoranthene, and benzo(a)pyrene. The results of the groundwater monitoring during the current post-closure permit period are found in Exhibit 16. A drawing showing estimated isoconcentration lines for the required groundwater monitoring constituents is found in Exhibit 12.

2.20.5 Groundwater Monitoring Requirements - 270.14(c)(5),(6),(7)

American Wood has been monitoring the groundwater quality as described in Module IV of the Post-Closure Permit. The site is in a corrective action

monitoring mode, and is expected to remain in this mode throughout the third permit cycle. These requirements include analyses of samples from "boundary" wells, "effectiveness" wells, and "compliance point" wells.

The present permit requires semiannual sampling and analyses of the "compliance point" wells. For the "effectiveness" wells, the present permit requires sampling and analyses on an annual basis. American Wood is requesting that MW-30 be removed from the effectiveness well list for the reasons explained in Section 1.0. For the "boundary" wells, the present permit requires semiannual sampling and analysis. Given the 20-year history of boundary well monitoring, American Wood is requesting that the monitoring frequency for boundary wells be changed to annual and that wells MW-33 and MW-31 be removed from the boundary well list as explained in Section 1.0.

A groundwater sampling and analysis plan is presented in Exhibit 14. A commercial laboratory will perform all analytical tests. No statistical comparison or procedures are proposed since the background values for the contaminants of concern are less than the method detection limits for the procedures used.

The results of the groundwater monitoring program, including groundwater elevations, flow rate, and direction, will be reported in the required corrective action effectiveness reports.

The facility will remain in a corrective action monitoring mode until corrective action is complete. At that time, a one-time analysis of the

compliance point wells will be conducted for Appendix IX constituents. When the MDEQ agrees that corrective action is complete, the facility will revert to a detection monitoring mode.

2.20.6 Corrective Action - 270.14(c)(8)

American Wood initiated corrective action in accordance with the approved corrective action plan in March of 1992. The corrective action system was designed to contain and capture the contaminant plume. The system utilizes two groundwater recovery wells and two DNAPL recovery wells. The system is a "pump and treat" system designed to stop the plume migration by creating a hydraulic capture zone which would ensure that no contaminants migrate past the pumping wells. One of the groundwater recovery wells (RW-2) is located near the downgradient property line to ensure that no additional off-site migration occurs. The second groundwater recovery well (RW-3) is located off-site, near the leading edge of the plume, to capture all off-site contaminants. The two DNAPL recovery wells are installed at locations where small quantities of DNAPL were identified during the earlier groundwater investigations.

Semi-analytical methods (fully explained and documented in the CAP submitted as part of the original post-closure permit application) were used to select well locations and design pumping rates to ensure capture of the plume at these two locations. Capture-zone type curves were prepared to allow visual selection of well locations and pumping rates needed to "capture" the plume. These "type curves" and the associated calculations are found in Exhibit 25.

The type curves are plots of "the equation of the dividing streamlines which separate the capture zone of this well from the rest of the aquifer" for various values of the function Q/BU, where: Q is a pumping rate (L^3/T); B is the aquifer thickness (L); and U is the conductivity, K, (L/T), times the groundwater gradient, i, (L/L) ("Capture-Zone Type Curves: A Tool for Aquifer Cleanup," Javandel & Tsang, Ground Water, Vol. 24, No. 5, 1986). The x-axis of the type curve is placed over the plume and aligned with the center line of the plume. The type curves are then moved along the center line of the plume until the X-Y intersection of the type curves is at the desired recovery well location. At that point, the value of the Q/BU curve that fully contains the contaminant plume is read. From this value of Q/BU, known values for B and U are inserted to solve for Q, the required pumping rate.

At this site, the location of the recovery wells was somewhat influenced by property ownership and access. A small parcel of land along the abandoned railroad right-of-way was purchased to allow installation of RW-2. From that location, a Q/BU of approximately 200 indicates capture of the plume that existed on the American Wood property. American Wood obtained permission to use the right-of-way along Pear Street to install RW-3, and a Q/BU of approximately 625 indicates capture of the plume at that location. Using the very conservative values discussed in section 2.20.2 of B=90 feet; K=150 ft/day, and i=0.0014, the design pumping rates were established as 20 gpm at RW-2 and 60 gpm at RW-3. Because of the very conservative values used for the aquifer properties, these rates may be more than twice the minimum required values. The groundwater recovery wells use stainless steel and teflon submersible pumps to pump the groundwater. The DNAPL wells

are equipped with "Pulse-Pumps" by QED Environmental, and are pumped on an intermittent basis to maximize DNAPL recovery.

The liquid from the two DNAPL wells and the water from RW-2 are pumped to an oil/water separator and water flows from the separator through a flow meter into the sanitary sewer system operated by the Town. The water from RW-3 flows through a flow meter into the same sewer system at a different outfall. The discharges are covered by a State Pretreatment Permit.

The long-term effectiveness of the corrective action system has been demonstrated through seventeen years of successful operation. No further migration of the plume has been detected. Corrective Action Effectiveness Reports have been submitted semi-annually since July 1992. American Wood is requesting that the reporting frequency be changed in the permit to annually to agree with the current requirements in MHWMR 264.100(g). The total volume of groundwater recovered by the corrective action system through the time of this application has been over 510,000,000 gallons. The concentration of contaminants in the leading edge well (RW-3) have typically been below the method detection limit, while the concentrations of contaminants in the combined discharge from the two DNAPL wells and the groundwater recovery well, RW-2, have declined over time, but remain in the low part per million range. Tables of the analytical results of samples from these two sources are found in Exhibit 21. A graph showing the decline in concentrations in the DNAPL/RW-2 discharge is also found in Exhibit 21. These analytical results are routinely submitted to the MDEQ on Discharge Monitoring Reports which are submitted quarterly.

The corrective actions system appears to be functioning as designed and there is no indication of a need to modify the system at this time.

The costs to perform corrective action at this site are reasonably well known after seventeen years of operation of the system. A new corrective action cost estimate is found in Exhibit 22. American Wood uses a trust fund to provide financial assurance for corrective action. This is the same trust used to provide financial assurance for post-closure care. American Wood was required to contribute an amount equal to one year of the estimated corrective action operating costs, each year for the first 15 years of corrective action. These contributions have been completed. The present value of the trust fund substantially exceeds the present financial assurance requirements. Copies of the trust and the fund balance, as well as a narrative discussion of financial assurance, are found in Exhibit 11.

2.21 Information Requirements for Solid Waste Management Units - 270.14(d)

There have been no new solid waste management units identified during the second 10-year permit cycle. The original HSWA permit issued by the EPA identified seven solid waste management units (SWMU) and four areas of concern (AOC) and required a RCRA Facility Investigation (RFI) to evaluate releases from these units. The locations of the SWMUs and AOCs are shown on the site drawings in Exhibit 2. American Wood prepared an RFI Work Plan which was approved by the EPA. The RFI was performed and a Report of RCRA Facility Investigation (Draft) was submitted in October 1992. After comments from the EPA, a Final Report of RCRA Facility Investigation, dated April 19, 1994, was submitted to the EPA and the MDEQ.

American Wood discussed and proposed certain corrective measures in the Final RFI report. First, the old treating plant process area used from 1965 to 1994, designated SWMU #12, was to be capped and closed as a landfill. The most heavily contaminated soils from the cylinder track and the old outdoor treated product storage area, which were also designated as AOCs 6 and 7 and SWMUs 14 and 15, were consolidated under the cap for the process area. Closure of the old treating plant as a landfill in accordance with the approved plan was completed in 1997.

American Wood also proposed certain other activities to address potential corrective actions for solid waste management units. These included additional deed notations concerning the possible presence of wood preserving constituents in the soil at the site, provision of additional site security by fencing the site, and provision of information on SWMU activities as part of the Corrective Action Effectiveness Reports. These proposed corrective actions were discussed with the EPA and accepted, and American Wood has completed these activities.

The EPA accepted the Final Report of RCRA Facility Investigation in a letter dated October 3, 1996. In that letter, the EPA stated that it would amend the HSWA permit as required to incorporate these proposed corrective actions. As of this submittal, no permit modification has been received. American Wood continues to operate under the expired permit.

2.22 Additional Not Applicable Requirements - 270.15 through 270.26

The information requirements in these paragraphs are specific to certain operating hazardous waste management units, and they are not applicable to this post-closure permit application.

ATTACHMENT C

Groundwater Sampling and Analysis Plan

(RCRA Part B Application, Exhibit 14)

AMERICAN WOOD
RICHTON, MS

EPA ID No. MSD 021 019 914

GROUNDWATER
SAMPLING AND ANALYSIS PLAN

Prepared By:
H. M. Rollins Company, Inc.
P. O. Box 3471
Gulfport, Mississippi 39505
(228) 832-1738

August 31, 2009

TABLE OF CONTENTS

1.0 GENERAL

This Sampling and Analysis Plan is to be used and followed by all personnel engaged in groundwater sampling and analysis activities at this site. Proper procedures and techniques for sample collection, sample preservation and shipment, chain-of-custody, and laboratory and field analysis will result in data which fairly represent the groundwater quality at the site.

2.0 QUALITY CONTROL/QUALITY ASSURANCE

Groundwater samples will be analyzed by an independent commercial laboratory. All phases of a laboratory's qualifications, experience, personnel, equipment, reputation and QA/QC procedures will be considered in selection of the laboratory.

The procedures outlined in this plan are the basis of the Quality Assurance Plan at this site. Where appropriate, each section within this plan addresses the specific quality control aspects of the subjects covered by that section. The President shall designate the Quality Assurance Coordinator for the Company. The Quality Assurance Coordinator is responsible for seeing that the specific quality control procedures as outlined in this plan are followed, and for tracking and recording the results of specific quality control (QC) programs. The Quality Assurance Coordinator is responsible for the field analysis QC program, the sampling event records, analytical results, and notifying the appropriate persons of any observed problems.

The President is responsible for seeing that personnel receive adequate training in order to provide the required quality control for sampling operations. In addition, he may

periodically observe the professional contract personnel and American Wood employees under actual field operating conditions to ensure that the Sampling Plan as outlined in this document is being followed.

Corrective actions will be taken any time when deemed necessary. Problems with field quality control may result from contamination of field blanks or contamination of field equipment and supplies either from the vendor, during the cleaning/loadout process, or during field operations. Corrective actions must be taken immediately when data is of questionable quality. These corrections may range from modifying certain procedures to reconducting an entire sampling event.

3.0 SITE SPECIFIC CONDITIONS

3.1 History

The groundwater at this site has been impacted by the use of surface impoundments to manage the hazardous waste listed as K001. The chemical constituents used as the basis for listing K001 as a hazardous waste are listed in Appendix VII of 40 CFR Part 261.

3.2 Dense Non-Aqueous Phase Liquids (DNAPL's)

The presence of a DNAPL in the first aquifer has been documented. This DNAPL is a black oily liquid which physically resembles coal tar creosote.

If the presence of DNAPL is detected in a well during water level and well depth measurement or during well purging activities, all efforts will be taken to remove the DNAPL prior to sampling. If a DNAPL-free sample cannot be obtained, sampling activities will be terminated for that well, and a note explaining the reason that no sample was taken will be placed in the sampling record.

4.0 ANALYTICAL PARAMETERS

4.1 Analytes

All wells sampled will be analyzed for the six K001 constituents specified in the Post-Closure Permit. These six chemicals are 2,4-dimethylphenol, acenaphthylene, naphthalene, fluoranthene, pentachlorophenol, and benzo(a)pyrene.

Compliance point, effectiveness, and boundary wells will be sampled at the frequencies required in the permit. American Wood proposes to sample compliance point wells on a semiannual basis, effectiveness wells annually, and boundary wells annually.

4.2 Analytical Procedures

All samples shall be analyzed using only methodology approved for each target analyte, listed in US EPA SW-846, latest edition, and which achieve MDLs in accordance with Groundwater Protection Standards. Organic analyses shall routinely be performed using gas chromatographic methods listed in the above reference. The use of gas chromatographic/mass spectroscopy methods from the above reference will be acceptable as alternate analytical procedures.

5.0 SAMPLING PROCEDURES

5.1 Sampling Event Planning

Prior to each sampling event, the sampling team leader will review the appropriate permit conditions to insure that the proper samples will be taken. The team leader will use personal knowledge or a review of prior sampling results to determine the expected ranking of the total contaminant level to be found in each well to be sampled. All measurements and sampling activities will be conducted in inverse order of expected contamination. The cleanest well will be sampled first, the dirtiest last. This will minimize any potential for cross-contamination between wells. The sampling team leader shall not schedule a sampling event immediately following any well maintenance activities (such as painting of the protective well casing) that could affect sample quality.

5.2 Sample Containers and Preservation

Samples to be analyzed for extractable organic compounds shall be collected in glass containers with Teflon lid liners. The minimum volume shall be 1 quart (0.946 l). No preservative chemicals are required.

In the event that samples are to be analyzed for purgeable or volatile organic compounds (VOC's), 40-ml glass vials with Teflon lined septum sealed caps will be used. Four drops of concentrated hydrochloric acid (HCL) will be added to each vial before filling.

If samples are to be analyzed for the metallic elements, polyethylene containers with polyethylene caps will be utilized. The minimum size shall be 1 quart (0.946 l). Two milliliters of 50% nitric acid shall be added to each container prior to filling (Micro-Methods, Inc., Ocean Springs, MS, advised that this will insure a sample pH of < 2 S.U.'s).

Sample containers will either be furnished by the analytical laboratory or they will be purchased. If purchased, the containers shall be ordered from a reputable supplier of laboratory supplies and equipment, and shall be pre-cleansed according to approved EPA protocols.

5.3 Sample Labels

Each sample container will be labeled with:

AMERICAN WOOD WELL NUMBER DATE AND TIME OF COLLECTION

The labels will be marked with water-proof ink and the glue must be as water-proof as possible to insure that the labels remain on the containers. The labels will be affixed to the container prior to filling. As a secondary identification, the well designation will also be marked on the container top with an indelible marker.

5.4 Sample Seals

Sample seals will not be used for individual samples. In the event that the samples will leave the sampler's immediate control, such as UPS shipment, the shipping container will be sealed with a tape which must be cut or broken if the shipping container is opened.

5.5 Sampling Field Records

Prior to the start of each sampling event, a sampling record coversheet will be completed. A monitoring well sampling record will be completed for each well sampled during that sampling event. The completed monitoring well sampling records and coversheet will be maintained in the permanent facility files. These records will be the permanent field records. A sampling record coversheet and monitoring well sampling record are attached to this plan.

5.6 Water Level/Well Depth Measurements

Prior to opening the well cover, the area surrounding the lock shall be inspected to insure that no excess oil is present which may inadvertently contaminate the well. Any excess oil shall be wiped away prior to opening.

After opening the well cover and removing the cap, the distance from the top of the well casing to the static water level in the well will be measured. The measurement will be made by use of a water level meter which gives an audible and/or visual indication or signal.

The distance to the static water shall be measured at the measuring point marked with black ink on the top of each casing, and shall be measured to the nearest 0.01 ft. and recorded on the monitoring well sampling record.

Once per year, the total depth of each well will be measured. If no non-aqueous phase liquids are expected, the water level meter may be used. Otherwise, a weighted steel tape will be used to determine total depth. If measurement of dense non-aqueous phase liquids is required, an interface probe or alternate method will be used.

The water level probe, interface probe, and any wetted cable or tape will be washed with non-phosphate laboratory detergent and thoroughly rinsed with distilled water between wells. The equipment should be protected from dust and dirt between uses.

5.7 Well Purging

After water level/depth measurements are completed, the volume of water present in each well casing will be calculated. Each well will be purged prior to sampling by the removal of 3 times that calculated volume. This will increase the probability that a representative sample is obtained.

In a 1¼" ID well, each foot of water column contains 0.064 gallons of water. Three times that volume is 0.191 gallons, which is rounded to 0.2 gallons. Therefore, for each foot of water present in a 1¼" well, the required purge volume is 0.2 gallons.

In a 2" ID well, each foot of water column contains 0.163 gallons of water. Three times that volume is 0.49 gallons, which is rounded up to 0.50 gallons. Therefore, for each foot of water in a 2" well, the required purge volume is ½ gallon.

In a 4" ID well, each foot of water column contains 0.652 gallons. Three times that volume is 1.956 gallons, which is rounded up to 2.0 gallons. Therefore, for each foot of water in a 4" well, the required purge volume is 2 gallons.

If any well fails to recover rapidly enough to allow purging of three well volumes in a reasonable time period, then the well will be purged to dryness prior to sampling. Field parameters should be checked during sampling to ensure sample consistency.

All wells will be purged by use of: (1) a single-use bailer, which will be raised and lowered by a new length of nylon twine; (2) by a suction lift pump using dedicated or single use suction tubing; or (3) by submersible pump.

All purge water from potentially contaminated wells will be collected and transported to the groundwater treatment system. Purge water from boundary wells that have historically been clean may be placed on the ground.

5.8 Sampling, Field Analysis, Preservation And Holding Times

After the required volume of purge water has been removed from the well, the temperature, specific conductivity and pH of the water will be measured and recorded on the well sampling records.

Samples shall be collected in the order of their volatility. All samples will be obtained by the use of sufficiently inert single-use disposable bailers, raised and lowered by new white nylon twine, or by peristaltic pump using new hose for each well. Given the fact that the majority of the wells to be sampled are constructed of PVC, these bailers may be constructed of polyethylene or PVC, which have been shown to be sufficiently inert through their use in all prior groundwater investigations at this site.

All personnel handling the twine, the bailer, or the sample container shall wear single-use medical examination gloves to minimize potential contamination.

Sample containers of one quart or larger will be carefully filled, leaving a small amount of headspace. If 40-ml vials are required for purgeable or volatile analytes, they will be carefully and slowly filled, ensuring that no air remains in the filled vial. The sample containers will be placed into a cooler, cushioned as needed to minimize the risk of breakage, and cooled to 4°C (39.8°F). Samples will be immediately delivered to the laboratory by the sampler or by common carrier to ensure that sample holding times are not exceeded.

5.9 Field Blanks

At each sampling event, one sample container will be filled with organic free water at a well site, and this container will be labeled Field Blank. This blank will be analyzed for the same list of constituents as the well samples themselves, and will serve as an indicator of laboratory error or contamination, container batch contamination, airborne contaminants, or handling contamination.

6.0 CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

The name of the sampler will be entered on the chain-of-custody. Prior to relinquishing custody of the samples, the analysis request and chain-of-custody record will be completed and signed by the leader of the sampling team. The original completed chain-of-custody shall be kept in a suspense file until the analytical results are received. At that time, the original chain-of-custody will be filed with the analytical results. A sample chain-of-custody and analysis request record is found attached to this plan.

7.0 EVALUATION AND REPORTS

Data generated at each sampling event will be compared to previous values to look for obvious errors and significant trends. Results of the analyses will be reported in Corrective Action Effectiveness Reports.

AMERICAN WOOD
DIVISION OF POWE TIMBER
RICHTON, MS

MONITORING AND RECOVERY WELL CONSTRUCTION DATA

WELL NO.	ELEVATION MEASURING PT, ft NGVD	TOTAL DEPTH	DRILL SIZE	CASING/ SCREEN DIAMETER	SCREEN LENGTH	CASING/ SCREEN MATERIAL
MW-1	171.75	35	6"	2"	15'	PVC
MW-2	169.77	40	6"	2"	20'	PVC
MW-3	169.79	40	6"	2"	20'	PVC
MW-4	170.45	39	6"	2"	20'	PVC
MW-5	169.35	40	4"	1.25"	5'	STEEL/BRASS
MW-6	168.10	40	4"	1.25"	5'	STEEL/BRASS
MW-7	167.84	40	4"	1.25"	5'	STEEL/BRASS
MW-8	165.05	40	4"	1.25"	5'	STEEL/BRASS
MW-9	163.40	29	4"	1.25"	15'	PVC
MW-10	169.61	48	4"	1.25"	20'	PVC
MW-11	168.17	31	4"	1.25"	20'	PVC
MW-12	163.22	32.5	4"	1.25"	15'	PVC
MW-13	166.68	24	4"	1.25"	5'	PVC
MW-14	166.66	45	4"	2"	5'	PVC
MW-15	166.69	75	6"	2"	5.8'	PVC
MW-16	166.44	40	6"	2"	5'	PVC
MW-17	166.38	66	6"	2"	6'	PVC
MW-18	169.72	50	6"	2"	5'	PVC
MW-19	168.37	65	6"	2"	10'	PVC
MW-20	164.48	35	6"	2"	5'	PVC
MW-21	158.88	65	6"	2"	5'	PVC
MW-22	168.00	108	6"	2"	10'	PVC
MW-23	163.96	75	6"	2"	10'	PVC
MW-24	168.35	65	6"	2"	5'	PVC
MW-25	157.95	70	6"	2"	10'	PVC
MW-26	156.05	80	6"	2"	10'	PVC
MW-27	151.10	66	6"	2"	10'	PVC
MW-28	160.02	80	6"	2"	10'	PVC
MW-29	151.28	77	6"	2"	10'	PVC
MW-30	153.99	72	6.5"	2"	10'	PVC
MW-31	153.48	72	6.5"	2"	10'	PVC
MW-32	156.33	72	6"	2"	10'	PVC
MW-33	154.92	70	6"	2"	10'	PVC
RW-2	170.17	95	8"	4"	70'	304 SS
RW-3	155.70	85	8"	4"	60'	304 SS

AMERICAN WOOD
RICHTON, MS

SAMPLING RECORD COVERSHEET

SAMPLE DATE(S): _____ PROTOCOL: ☐ SEMIANNUAL - CP & BNDY Wells.
☐ ANNUAL - All Wells.

WEATHER CONDITIONS: _____

_____

_____

SAMPLING TEAM PERSONNEL:

TEAM LEADER: _____

_____ _____

_____ _____

_____ _____

EQUIPMENT:

☐ WATER LEVEL METER: _____
(TYPE, MODEL & SERIAL NO.)

☐ pH METER: _____ (TYPE, MODEL & SERIAL NO.)
CALIBRATED? _____ INITIAL _____

☐ SPECIFIC CONDUCTIVITY

METER: _____ (TYPE, MODEL & SERIAL NO.)
CALIBRATED? _____ INITIAL _____

☐ SOURCE/TYPE/SIZE OF SAMPLE CONTAINERS: _____

_____

_____

☐ SOURCE AND TYPE OF BAILERS: _____

_____

_____

COMMERCIAL LABORATORY: _____

COMMENTS: _____

_____

_____

_____

Revised October 6, 2000

AMERICAN WOOD

MONITORING WELL SAMPLING RECORD

SAMPLE PERIOD:				SAMPLER:			
WELL NUMBER	MW-33	MW-32	MW-31	MW-29	MW-25	MW-19	MW-5
WELL CATEGORY	Boundary	Boundary	Boundary	Boundary	Boundary	Boundary	Boundary
SAMPLE DATE / TIME							
MEASURING PT ELEV	154.92	156.33	153.48	151.28	157.95	168.37	169.35
DEPTH OF WELL							
DISTANCE TO WATER							
WATER IN WELL, ft							
PURGE FACTOR (gal/ft)	0.5	0.5	0.5	0.5	0.5	0.5	0.2
PURGE VOLUME							
pH, SU							
TEMP., °C or °F							
SPECIFIC CONDUCT.							

WELL NUMBER	MW-30	MW-14	MW-15	MW-16	MW-17	MW-23	MW-11
WELL CATEGORY	Effectiveness	Effectiveness	Effectiveness	Effectiveness	Effectiveness	Effectiveness	Effectiveness
SAMPLE DATE / TIME							
MEASURING PT ELEV	153.99	166.66	166.69	166.44	166.38	163.96	168.17
DEPTH OF WELL							
DISTANCE TO WATER							
WATER IN WELL							
PURGE FACTOR (gal/ft)	0.5	0.5	0.5	0.5	0.5	0.5	0.2
PURGE VOLUME							
pH, SU							
TEMP., °C or °F							
SPECIFIC CONDUCT.							

WELL NUMBER	MW-8	MW-6	MW-13	MW-1	MW-2	MW-3	
WELL CATEGORY	Effectiveness	Effectiveness	Effectiveness	Compliance	Compliance	Compliance	
SAMPLE DATE / TIME							
MEASURING PT ELEV	165.05	168.10	166.68	171.75	169.77	169.79	
DEPTH OF WELL							
DISTANCE TO WATER							
WATER IN WELL							
PURGE FACTOR (gal/ft)	0.2	0.2	0.2	0.5	0.5	0.5	
PURGE VOLUME							
pH, SU							
TEMP., °C or °F							
SPECIFIC CONDUCT.							

American Wood
Distance to Water Field Record Sheet

Date: _____

Well Number	Meas. Point	Distance to Water	Notes
MW-1	Prot. Cas.		
MW-2	Prot. Cas.		
MW-3	Prot. Cas.		
MW-4	Prot. Cas.		
MW-5	Prot. Cas.		
MW-6	Prot. Cas.		
MW-7	Prot. Cas.		
MW-8	Prot. Cas.		
MW-9	Prot. Cas.		
MW-10	Prot. Cas.		
MW-11	Prot. Cas.		
MW-12	Prot. Cas.		
MW-13	Prot. Cas.		
MW-14	Well Cas.		
MW-15	Well Cas.		
MW-16	Well Cas.		
MW-17	Well Cas.		
MW-18	Well Cas.		
MW-19	Well Cas.		
MW-20	Well Cas.		
MW-21	Well Cas.		
MW-22	Well Cas.		
MW-23	Well Cas.		
MW-24	Well Cas.		
MW-25	Well Cas.		
MW-26	Well Cas.		
MW-27	Well Cas.		
MW-28	Well Cas.		
MW-29	Well Cas.		
MW-30	Well Cas.		
MW-31	Well Cas.		
MW-32	Well Cas.		
MW-33	Well Cas.		

RCRA MONITORING WELL SAMPLE RECORD
ANALYSIS REQUEST AND CHAIN-OF-CUSTODY DOCUMENT

AMERICAN WOOD, DIVISION OF POWE TIMBER
P.O. DRAWER 1617
RICHTON, MS 39476 **(601) 788-6564**

Samplers (Signatures):

DATE	TIME	WELL NUMBER	NO./TYPE CONTAINER	COOLED? (Y / N)	ANALYZE FOR: (SW-846 OR EQUIVALENT METHODS) K001 Monitoring List (See Below)					REMARKS (PURGE VOLUME, COLOR, ODOR, etc.)

K001 Monitoring List: Pentachlorophenol, 2,4-Dimethylphenol, Acenaphthalene, Naphthalene, Flouranthene, Benzo(a)pyrene.

Container Types: P = Plastic CG = Clear Glass AG = Amber Glass

RELINQUISHED BY: TIME/DATE:	RELINQUISHED BY: TIME/DATE:	RELINQUISHED BY: TIME/DATE:	LABORATORY:
RECEIVED BY: TIME/DATE:	RECEIVED BY: TIME/DATE:	RECEIVED BY: TIME/DATE:	LAB COMMENTS:

ATTACHMENT D

Post-Closure Plan

(RCRA Part B Application, Exhibit 7)

AMERICAN WOOD
RICHTON, MS

EPA ID No. MSD 021 019 914

POST-CLOSURE PLAN

Prepared By:
H. M. Rollins Company, Inc.
P. O. Box 3471
Gulfport, Mississippi 39505
(228) 832-1738

August 31, 2009

TABLE OF CONTENTS

1.0 GENERAL INFORMATION

This plan describes the activities that will be performed at this site during the post-closure care period. These activities will include: routine care and maintenance of the closed regulated units and groundwater monitoring system; groundwater monitoring activities; and reporting and other activities required during the post-closure period.

American Wood certified closure of its surface impoundments during 1987. The required 30-year post-closure care period began when the units were certified as closed; however, American Wood will consider the post-closure period to run from the effective date of the initial RCRA permit, August 22, 1989, until August 22, 2019, unless extended or shortened by the Mississippi Department of Environmental Quality. At the time of this second permit renewal, the facility has completed 20 years of post-closure care.

2.0 SELECTION OF MAINTENANCE ACTIVITIES

The selection of maintenance activities is influenced by the type of the closed hazardous waste management units (HWMUs) and the method of closure. For preparation of this post-closure plan, guidance was obtained from Mississippi Hazardous Waste Management Regulations, Parts 264, 265, and 270, and EPA SW-968, "Permit Applicant's Guidance Manual for the General Facility Standards of 40 CFR 264."

The HWMUs at this site were closed in accordance with an approved closure plan. The closure incorporated a low permeability cap (consisting of two feet of 10^{-7} cm/sec permeability clay) with a final cover of 12" of sandy loam and a good stand of native grass.

The following items were considered for inclusion as required maintenance activities:

Maintenance Item	Action/Discussion
Erosion Damage	Included.
Final Containment Structures	Not included; there are no structures.
Facility Monitoring Equipment	Not included; there is no facility monitoring equipment as this term is used. Groundwater monitoring equipment is discussed separately.
Security Devices	Included, although there are no wastes exposed and no physical security should be required, the facility has installed security fences around the HWMUs.
Vegetative Cover	Included.
Run-on, Run-off Control System	Included; under erosion control.
Leachate Collection, Detection, and Removal System	Not included; these are unlined surface impoundments, therefore there is no leachate collection, detection, and removal system.
Gas Venting System	Not included; there is no gas venting system needed. The small quantity of waste remaining is not subject to rapid biological breakdown or chemical degradation resulting in significant gaseous product.
Groundwater Monitoring System	Included.
Fugitive Dust Control	Not included; due to the method of closure and use of the closed site, there is no need for a fugitive dust control system.

Maintenance Item	Action/Discussion
Crop Prohibitions	Not included; no crops will be grown on this site.
pH Control	Not included; there will be no pH control at this site.
Benchmark Integrity	Not included. The benchmarks used in the survey of this site were set by the Coast and Geodetic Survey. In the event of their destruction, sufficient additional benchmarks are available to re-establish locations as necessary.

The additional requirements listed below, applicable to owners/operators of surface impoundments closed with wastes in place, have also been investigated for inclusion in the maintenance checklist:

Maintenance Item	Action/Discussion
Procedures for Maintenance & Repair of Final Cover	Included.
Procedures for Maintenance & Monitoring of Leak Detection System	Not included; there is no leak detection system.
Procedures for Maintenance & Monitoring of Groundwater Monitoring System	Included.
Procedures for Sampling, Analysis, & Quality Control	Included.
Procedures for Preventing Run-on/Run-off and Final Cover Damage	Included.

3.0 FREQUENCY OF ACTIVITIES

The site will be inspected on a quarterly basis for items requiring maintenance or care, as detailed in the Post-Closure Care Instructions and Checklist presented later in this plan. Maintenance and care will be provided on an as-needed basis, based on observations made during the inspections.

Groundwater monitoring activities will be conducted on a frequency as specified in the Post-Closure Permit.

4.0 POST-CLOSURE PLAN CUSTODY AND CONTROL

American Wood will maintain one copy of this plan at its office on Highway 15 North, Richton, Mississippi. The President of the company will be responsible for maintaining and updating this Post-Closure Plan during the post-closure care period. The facility contact number is (601) 788-6564. The President will also ensure that any and all changes to this plan will be submitted to the Chief, Environmental Permits Division, Office of Pollution Control, Mississippi Department of Environmental Quality. These changes will be forwarded via U.S. Postal Service, Certified Mail, Return Receipt Requested, or by other means which allows for documentation of delivery.

5.0 NOTICES REQUIRED FOR DISPOSAL FACILITIES

The required notices for disposal facilities have been filed. Copies of notices and plats are found in Exhibit 9 of the Renewal Application for the Post-Closure Permit.

6.0 POST-CLOSURE INSTRUCTIONS AND CHECKLIST

6.1 General

These instructions are to provide guidance for the post-closure care and maintenance of the closed surface impoundments, groundwater monitoring system, and security fencing. Care and maintenance of these items is essential to insure proper functioning of these systems. A checklist for recording inspection and maintenance activities during the post-closure period is found as an attachment to this plan.

6.2 Care and Maintenance Instructions

The area of the closed surface impoundments will be inspected quarterly, and following any storms that may have resulted in site flooding. The checklist will be used to record all findings of the inspection and to record corrective actions taken.

The design of the closure system of these impoundments incorporated the placement of a highly impervious clay cap over the impoundments with a cover layer of soil, graded and drained to minimize surface infiltration of rainfall, to eliminate rainfall run-on, and to control surface erosion. The vegetative cover of native grasses was established to maximize evapotranspiration of infiltrated rainfall and to control erosion. The species of grass was also selected to ensure that the root zone of the grass does not intrude into the clay cap, thereby damaging the integrity of the cap.

The following activities associated with the proper care of the facility will be performed at the frequency shown:

1. Bimonthly (May through October): The grass within the security fence around the site will be mowed. Additional mowings may be conducted if needed.

2. Biennially: The grass within the security fence around the site will be fertilized. The application rate recommended by USDA Soil Conservation Service for the grass cover is 200 lbs/acre. The fertilizer used shall contain 13% Nitrogen, 13% Phosphorus, and 13% Potassium, as recommended by the USDA Soil Conservation Service for soils in this area.

3. Quarterly: The site will be inspected in each quarter for items requiring maintenance or further care. The following is a list of areas or items to be inspected and a list of proper corrective actions to be taken if deficiencies are found:

   A. Final Cover and Cap

      If the final cover shows signs of erosion, the area will be brought back to grade using topsoil. The affected area will be reseeded, fertilized, and covered with hay to prevent short term erosion.

      If erosion or subsidence has affected the clay cap, it will be refilled with clay of the same type and will be recompacted using pneumatic

tamping equipment. With this type of waste, subsidence is not likely. The final cover and vegetation will be restored as above.

If the vegetation is not dense enough to provide runoff protection, the affected area will be disked to a 3" depth, fertilized, and reseeded.

The drainage system consisting of shallow ditches will be checked to ensure that free flow of rainfall off of the site will occur and that run-on is prevented.

B. Monitoring Wells

The quarterly inspection of the monitoring wells will consist of inspection of the condition of the outer protective casing or cover, lock, concrete surface collar and the well casing.

Locks will be lightly lubricated as needed. Protective outer covers or casings will be painted if rusted. Care must be taken to insure that these activities do not contaminate the wells.

The concrete surface collar will be repaired or replaced if broken or badly cracked.

The well casing will be inspected for cracks or other damage. Other internal deterioration such as silting, incrustation, and plugging may become apparent during sampling events. In the event that these

problems progress to a point that interferes with the functioning of the monitoring well, appropriate well maintenance and rehabilitation activities will be carried out. In the event that maintenance and rehabilitation procedures do not return the well to a functioning condition, the well will be abandoned. If any well must be abandoned, a new well will be installed.

If the measurement of the total depth of a well indicates that more than 12 inches of sediment is in the bottom of a well, a surface pump with a suction pipe capable of reaching the bottom of the well will be used to remove the silt accumulation. Smaller amounts of silt are acceptable provided that reasonably clear samples are produced. If silt removal doesn't eliminate problems of sample turbidity then the well will be scheduled for redevelopment prior to the next sampling event.

Guidance for well maintenance and rehabilitation activities and well abandonment procedures will be obtained from those found in Section 8, pgs. 246-264, "Handbook of Suggested Practices for the Design and Installation of Groundwater Monitoring Wells," Aller et. al., U.S. EPA and NWWA, 1989.

C. Security Fence

The security fence will be inspected for damage due to vandalism or other causes. Maintenance will consist of repairing or replacing broken wires, tensioning loose strands, etc. The warning signs will

be inspected to ensure that they are present and readable. They will be replaced or repainted as needed.

7.0 GROUNDWATER MONITORING PLAN

This plan prescribes the groundwater monitoring activities to be conducted at this site during the post-closure care period. The site presently remains in a corrective action monitoring mode, with analyses being performed for site-specific constituents for which the background values are below the present method detection limits.

Post-closure care groundwater monitoring activities will consist of sampling the three (3) compliance point wells, consisting of wells MW-1, MW-2, and MW-3. The location of these wells is shown on the site drawing found in Exhibit 2 of the Renewal Application for the Post-Closure Permit. Additional groundwater monitoring is conducted as part of the corrective action program.

7.1 Sampling and Analysis Procedures

The groundwater monitoring to be conducted will be performed in accordance with the facility Groundwater Sampling and Analysis Plan. A copy of the plan is found in Exhibit 14 of the Renewal Application for the Post-Closure Permit.

7.2 Wells to be Sampled

The compliance point wells MW-1, MW-2, and MW-3, will be sampled on a semiannual basis.

7.3 Monitoring Parameters

This section prescribes the monitoring parameters to be used during the post-closure care period.

1. Field Data

At each sampling event, the groundwater elevation shall be determined in each sampled well. The total depth will be measured on an annual basis. The pH, specific conductance, and temperature of each sample will be measured and recorded during sampling.

2. Chemical Parameters

During the post-closure permit period, all monitoring well samples will be analyzed for six (6) constituents of the K001 waste that was previously generated at the facility. These constituents are typically found in the highest concentrations and have the highest water solubilities. These compounds are: naphthalene, fluoranthene, acenaphthylene, pentachlorophenol, benzo(a)pyrene, and 2,4-dimethylphenol. These parameters have been used for 20 years of post-closure care, and the monitoring history confirms their suitability as monitoring constituents.

7.4 Background Determination

Monitoring conducted during the first 20 years of post-closure care confirms that background values for the site-specific monitoring parameters are below present method detection limits. Any quantifiable levels of the monitored parameters will be considered as evidence of contamination.

7.5 Evaluation of Sampling Results

American Wood anticipates remaining in a corrective action monitoring mode during the next post-closure permit cycle. Since the background concentration of the constituents of concern is below the method detection limits, statistical comparisons of monitoring results to background values are not possible, or necessary. Any positive finding is considered to be an indication of contamination.

Constituent concentrations in the compliance point wells continue to show high concentrations and some evidence of DNAPL. Groundwater sampling at the compliance point wells will be continued for the remainder of the 30-year post-closure period, or until such time as cessation of activities is approved by the MDEQ.

8.0 DETERMINATION OF GROUNDWATER FLOW RATE AND DIRECTION

Annually, the flow rate and direction of groundwater flow will be determined from static water level measurements and estimated permeabilities, porosities, and conductivities. This information will be presented to MDEQ in the Corrective Action Effectiveness Report submitted in January of each year.

AMERICAN WOOD
HAZARDOUS WASTE FACILITY
POST-CLOSURE INSPECTION CHECKLIST

INSPECTOR: _____ DATE: _____ TIME: _____

CLOSED IMPOUNDMENT SITES

Cap And Cover System: Inspect grass cover for dead spots or poor coverage. Look for subsidence, ponding, and any damage from surface water run-off. Inspect for encroaching woody vegetation and remove. Check drainage channels for erosion, sedimentation, or blockage. Correct any deficiencies found and note type of corrective action and date below.

ITEM	CONDITION	CORRECTIVE ACTION
Caps		
Drainage		
Channels		

AMERICAN WOOD
HAZARDOUS WASTE FACILITY
POST-CLOSURE INSPECTION CHECKLIST **DATE:**_____

Monitoring Well System: Inspect surface slabs for cracking. Check protective standpipe, covers and locks for rust and serviceability. Inspect well casing for cracks or other defects. Correct any deficiencies found and note type of corrective action and date below.

WELL NO.	CONDITION	CORRECTIVE ACTION

Security Fence: Inspect fence and gate. Look for rust, loose, damaged or missing strands of wire, and decayed posts. Check function of lock and gate. Inspect warning signs for presence and readability. Correct any deficiencies found and note type of corrective action and date below.

ITEM	CONDITION	CORRECTIVE ACTION
Fence		
Gate		
Warning		
Signs		

ATTACHMENT E

Post-Closure Care Cost Estimate

(RCRA Part B Application, Exhibit 10)

AMERICAN WOOD
RICHTON, MS

POST-CLOSURE COST ESTIMATE

Prepared By:
H. M. Rollins Company, Inc.
P. O. Box 3471
Gulfport, Mississippi 39505
(228) 832-1738

August 31, 2009

American Wood is providing post-closure care for two (2) hazardous waste units closed as landfills in accordance with the provisions of a RCRA Post-Closure Permit issued by the Mississippi Department of Environmental Quality (MDEQ). Mississippi Hazardous Waste Management Regulations (MHWMR) require the performance of post-closure care for a period of 30 years from the date the facility certifies closure in accordance with the approved closure plan.

American Wood certified closure of the two (2) units during 1987. Based upon the initial Post-Closure Cost Estimate, American Wood made a lump sum deposit of $87,450 into a trust fund to cover the 30-year period.

This revised post-closure cost estimate was prepared as part of the application for the second renewal of the facility post-closure permit. At the time of this application, based on the 1987 closure date, only eight (8) years of post-closure care remain, however this cost estimate is based on a typical 10-year permit cycle. In addition to post-closure activities at the site, there are corrective actions ongoing which are associated with the remedial activities addressing the groundwater contamination present at the site. These corrective action activities are described elsewhere in the permit application. The costs described below do not reflect any costs associated with these corrective action activities. The costs associated with the corrective action activities are described in the Corrective Action Cost Estimate.

The regulations require that the post-closure cost estimate reflect costs for the required post-closure activities based on the performance of these activities by third party entities, rather than facility employees. The post-closure activities required at the American Wood facility are limited, and they are described in the separate Post-Closure Plan.

The post-closure care activities on this site include quarterly inspections of the closed units, maintenance of the final cover on the units (erosion control and repair, mowing of grass), maintenance of the fences surrounding the units, sampling and analyses of groundwater samples from the compliance point wells, other general maintenance, and administrative activities.

The major costs associated with the post-closure activities are:

1. Quarterly inspections of the closed impoundment site.
2. Semiannual sampling of the compliance point groundwater monitoring wells.
3. Groundwater analytical expenses.
4. Final cover maintenance.
5. Fence maintenance.
6. Miscellaneous maintenance.
7. Administrative reporting requirements.

The cost estimates for these categories are detailed below:

Quarterly Inspections - The closed impoundments and the monitoring well system will be inspected on a quarterly basis. An estimate of ½ of a technician man-day @ $75/hr, will be used for each inspection.

4 inspections/year X 4 hrs/inspection X 10 years X $75/hr = $ 12,000

Semiannual Monitoring - The semiannual monitoring of the compliance point wells can be accomplished on the same days as two of the quarterly inspections. An additional ½ technician man-day will be required to sample the three monitoring wells.

2 sampling events/year X 4 hrs/event X 10 years X $75/hr = $ 6,000

Groundwater Analysis - The three compliance point wells will be analyzed semiannually. The cost for analysis of the six parameters included in the plan is presently $135/sample. Sampling supplies are estimated at $20/sample.

Analyses: 3 samples X 2 events/year X 10 years X $135/sample = $ 8,100
Supplies: 3 samples X 2 events/year X 10 years X $20/sample = $ 1,200

Once groundwater protection standards are met, Appendix IX monitoring will be required at the three compliance point wells. The cost of an Appendix IX analysis is approximately $1,000/sample, with sampling supplies included.

Analysis: 3 samples X $1,000/sample = $ 3,000

Final Cover Maintenance - It is estimated that eight general labor man-hours will be required each year for final cover maintenance. The cost for this man is estimated at $20/hr, including overhead. In addition, one day of light tractor work, at $280/day, may be required biennially. One truck load of topsoil (8 cubic yards @ $10/cubic yard)

may also be required biennially. The area will be mowed six times per year at a cost of $50 per cut.

8 man-hours/year X $20/man-hour X 10 years	=	$ 1,600
One light tractor day: $280/day X 1 day/2 years X 10 years	=	$ 1,400
Topsoil: 8 cy X $10/cy X ½ years X 10 years	=	$ 400
Mowing: 6 cuts X $50/cut X 10 years	=	$ 3,000

Fence Maintenance - The fence will be maintained as required. A total of 8 general labor man-hours per year should keep the fence in good repair. An allowance of $50/year for fence materials (wire and posts as needed) is included.

8 man-hours X $20/man-hour X 10 years	=	$ 1,600
Supplies - lump sum: $50/year X 10 years	=	$ 500

Miscellaneous Maintenance - It is estimated that 8 general labor man-hours per year will be expended in miscellaneous maintenance activities, at an estimated rate of $20/hour including overhead. A lump sum estimate of $100/year is included for maintenance supplies. This maintenance includes minor repairs to the monitoring well covers, fence, and warning signs, and removal of any encroaching vegetation.

8 man-hours X $20/man-hour X 10 years	=	$ 1,600
Supplies - lump sum: $100/year X 10 years	=	$ 1,000

Administrative Reporting Expenses - During post-closure care, American Wood must determine the groundwater flow rate and direction. This is a simple and routine determination based on information obtained during groundwater monitoring activities, and the cost for preparation is estimated at 3 professional man-hours per year and 1/2 of a clerical man-hour per year.

1 report/year X 3 hrs/report X $100/man-hour X 10 years	=	$ 3,000
1 report/year X .5 hrs/report X $25/man-hour X 10 years	=	$ 125

TOTAL POST-CLOSURE COST ESTIMATE = $ 44,525

ATTACHMENT F

Corrective Action Cost Estimate

(RCRA Part B Application, Exhibit 22)

AMERICAN WOOD
RICHTON, MS

CORRECTIVE ACTION COST ESTIMATE

Prepared By:
H. M. Rollins Company, Inc.
P. O. Box 3471
Gulfport, Mississippi 39505
(228) 832-1738

August 31, 2009

This cost estimate is prepared to demonstrate the estimated costs of corrective action at the facility. This cost estimate will include only operating costs, as the capital costs associated with system installation are already expended.

The implemented corrective actions include groundwater extraction and discharge to the Town of Richton POTW. An indirect discharge permit was issued to American Wood for this purpose. The corrective action system includes four wells. One well is off-site and discharges directly to the sewer system. The other three wells include two DNAPL recovery wells and one groundwater pumping well. The discharge of these wells is processed through a commercial oil/water separator prior to discharge to the POTW.

The costs for implementation of the corrective action activities fall into the following categories:

1. Analytical Expenses
2. Electrical Power
3. Operating Labor
4. Engineering And Technical Assistance
5. Maintenance

Certain of the activities are redundant to activities already funded under the separate post-closure cost estimate. In particular, costs associated with groundwater sampling and analysis fall in this category. The corrective action cost estimate will include only those costs over and above those already included in the post-closure cost estimate.

COST ESTIMATES

1. Analytical Expenses:

The post-closure permit currently requires that 3 compliance point wells be monitored semiannually, 7 boundary wells semiannually, and 10 effectiveness wells annually. With this renewal application, American Wood is proposing that the 7 boundary wells be moved to annual sampling. Assuming this is approved, this totals 23 analyses per year, 17 of which will be associated with corrective action. The cost for the required organic analysis is $135 per sample. Corrective action is based on the standard 30-year time frame.

Groundwater Analyses:

17 analyses/year X 30 years @ $135/analysis	$ 68,850	
Sampling supplies @ $20/sample	$ 10,200	
30-year Total	$ 79,050	
The annual cost for groundwater analyses is		$ 2,635

The state indirect discharge permit requires monthly monitoring at the two groundwater discharge outfalls.

Discharge Monitoring Analyses:

12 per year X 2 outfalls X 30 years @ $135/sample	$ 97,200	
The annual cost for discharge monitoring is		$ 3,240

Annual Analytical Expenses **$ 5,875**

2. Electrical Power:

The corrective action system will employ a 1 horsepower pump, a 1/2 horsepower pump, and a 5 horsepower air compressor. The pumps will operate full time and the compressor will operate at an estimated 50% duty factor.

The average power requirement is 4 horsepower. The annual cost to operate 4 horsepower of electric motors on a continuous basis is calculated based on the following:

1 kilowatt = 1.341 horsepower
Est. Mechanical Efficiency = 85%
Power Cost = $.10/Kw-hour

4 hp X 8760 hr/yr ÷ .85 X .7457 kw/hp X $.10/Kw-hour	$ 3,075
Annual Electrical Power Expenses	**$ 3,075**

3. Operating Labor:

Approximately 1/2 general labor hour per day will be required to check system operations. Annual operating labor is then:

.5 hr/day X 365 days/yr X $20/hr	$ 3,650
Annual Operating Labor Expenses	**$ 3,650**

4. Engineering And Technical Assistance:

Engineering and technical assistance will be required for groundwater monitoring and preparation of annual corrective action effectiveness reports. The semiannual monitoring of the compliance point wells will be accomplished in the 1/2 day time period included in the post-closure plan and is therefore not included here. The remaining annual monitoring of the boundary and effectiveness wells will take 1.5 days for each event, using technical labor, which covers 10 effectiveness wells and 7 boundary wells.

Corrective Action Annual Sampling:

1 event/year X 1.5 days/event X 8 hours/day X $75/hour	$ 900

Annual corrective action effectiveness reports will require 16 hours of professional time per year and 4 hours of clerical time per year.

Corrective Action Effectiveness Reports:

Professional Time - 16 hrs @ $100/hr	$ 1,600
Clerical Time - 4 hrs @ $25/hr	$ 100
Reporting Total	$ 1,700
Annual Engineering and Technical Expenses	**$ 2,600**

5. Maintenance Expense:

An annual estimate of 40 general labor man-hours of maintenance will be used along with a lump sum of $1,000 for maintenance supplies and equipment replacement.

Maintenance Expense:

40 hours @ $20/hour	$ 800
Maintenance Materials	$ 1,000
Annual Maintenance Expenses	**$ 1,800**

The above annual costs are summarized as follows:

		Annual Cost Summary
1.	Analytical Expenses	$ 5,875
2.	Electrical Power	$ 3,075
3.	Operating Labor	$ 3,650
4.	Engineering & Technical Assistance	$ 2,600
5.	Maintenance Expense	$ 1,800
	Annual Total	$ 17,000
	30 Year Total	$510,000
	10% Contingency	$ 51,000
	Total Corrective Action Cost	**$561,000**

ATTACHMENT G

Financial Assurance Mechanism

(RCRA Part B Application, Exhibit 11)

American Wood

Financial Assurance Discussion

American Wood is providing financial assurance for post-closure care and corrective action through a trust fund mechanism. The regulations require that the post-closure financial assurance for 30 years of post-closure care be fully prefunded. The original 30-year post-closure cost estimate was $87,450, and an initial cash contribution in this amount was made into the fund. The Post-Closure Cost Estimate was revised as part of this RCRA Permit Renewal Application. The revised costs for the 10 years remaining total $44,525.

The corrective action financial assurance is being funded in accordance with proposed rules published in the Federal Register on October 24, 1986, which were referenced by Condition II.K of the permit. For a trust fund mechanism, these proposed rules require funding of the trust over a 15-year period. The required balance at the end of the 15 years is equal to 15 years of corrective action operating costs. The required 15 contributions have been made to the fund. The present corrective action cost estimate, including a 10% contingency, is $18,700/yr, or $280,500 for 15 years.

Using the revised cost estimate for post-closure care and the new corrective action cost estimate, the required fund balance would be $44,525 plus $280,500, or a total of $325,025. The value of the trust fund on April 30, 2009 was $446,908.40, which is higher than the required balance computed above.

For the Account of:
AMERICAN WOOD

Account Number: ***50 00 0368 0 0B***
Date: ***From 04/01/2009 through 04/30/2009***

BancorpSouth
Asset Management & Trust

POWE TIMBER CO DBA
AMERICAN WOOD
ATTN: JOAN KING
P O BOX 1532
HATTIESBURG MS 39401

Account Valuation	Market Value
04/30/2009	457,671.07
03/31/2009	458,467.25
12/31/2008	455,184.46

Investment Summary

Units	Description	Unit price	Cost	Market
	CASH		0.00	0.00
50,554.55	GOLDMAN SACHS GOVT M/M (I)	1.000	50,554.55	50,554.55
4,408.37	GOLDMAN SACHS GOVT M/M (P)	1.000	4,408.37	4,408.37
	TOTAL CASH AND CASH EQUIVALENTS		54,962.92	54,962.92
30,000	FHLB 4.125 102111/09	101.438	30,002.37	30,431.40
60,000	FHLB 4.375 111312/09	101.969	60,000.00	61,181.40
75,000	FFCB 4.75 093015	107.000	73,911.00	80,250.00
65,000	FFCB 4.00 093016/10	101.094	65,000.00	65,711.10
5,758.486	FEDERATED GNMA TRUST	11.170	63,905.00	64,322.28
9,537.556	FEDERATED INCOME TRUST	10.670	98,127.11	100,811.92
	TOTAL FIXED INCOME SECURITIES		390,945.48	402,708.15
	TOTALS		445,908.40	457,671.07

Activity Review

Date	Transaction Description	Cash	Investments @ Cost
04/01/2009	BEGINNING BALANCES	0.00	445,647.21
04/02/2009	DIVIDEND RECEIVED GOLDMAN SACHS GOVT M/M (I)	21.45	0.00
04/02/2009	DIVIDEND RECEIVED GOLDMAN SACHS GOVT M/M (P)	3.85	0.00
04/02/2009	DIVIDEND RECEIVED FEDERATED INCOME TRUST	386.80	0.00
04/02/2009	DIVIDEND RECEIVED FEDERATED GNMA TRUST	253.36	0.00
04/03/2009	PURCHASED 684.26 SHS @ $1.00 PER SHARE GOLDMAN SACHS GOVT M/M (I)	-684.26	684.26
04/13/2009	TRUST DEPARTMENT FEE FOR QUARTER ENDED 03/31/09	-921.82	0.00
04/13/2009	SOLD 921.82 SHS @ $1.00 PER SHARE GOLDMAN SACHS GOVT M/M (I)	921.82	-921.82

#CNTL# 0000000037 4 04/06/2009/11:46:52/742/15

For the Account of:
AMERICAN WOOD

Account Number: 50 00 0368 0 08
Date: From 04/01/2009 through 04/30/2009

BancorpSouth
Asset Management & Trust

Activity Review

Date	Transaction Description	Cash	Investments @ Cost
04/21/2009	INTEREST ON 30000 PAR VALUE FHLB 4.125 102111/09	618.75	0.00
04/22/2009	PURCHASED 618.75 SHS @ $1.00 PER SHARE GOLDMAN SACHS GOV'T M/M (f)	-618.75	618.75
04/30/2009	ENDING BALANCES	0.00	441,908.40

#CNTL# 0300000037 5 6/05/2009/11:45:52/742/16

FIRST AMENDMENT TO THE
MISSISSIPPI HAZARDOUS WASTE TRUST FUND AGREEMENT
MISSISSIPPI HAZARDOUS WASTE REGULATIONS RULE 264.151(a)

THIS FIRST AMENDMENT TO THE MISSISSIPPI HAZARDOUS WASTE TRUST FUND AGREEMENT MISSISSIPPI HAZARDOUS WASTE REGULATIONS RULE 264.151(a), hereinafter referred to as the "Amendment," is made and entered into as of this 10th day of June, 2009, by and between **AMERICAN WOOD, DIVISION OF POWE TIMBER COMPANY, INC.**, a Mississippi corporation, hereinafter referred to as the "Grantor," and **BANCORPSOUTH BANK** (formerly Bank of Mississippi), hereinafter referred to as the "Trustee."

W I T N E S S E T H:

WHEREAS, the Mississippi Department of Natural Resources, "MS. DNR", an agency of the State of Mississippi, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility shall provide assurance that funds will be available when needed for closure and/or post-closure care of the facility; and

WHEREAS, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein; and

WHEREAS, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as Trustee; and

WHEREAS, the Grantor and Trustee executed on August 5, 1992, a certain document entitled MISSISSIPPI HAZARDOUS WASTE TRUST FUND AGREEMENT

MISSISSIPPI HAZARDOUS WASTE REGULATIONS RULE 264.151(a), hereinafter referred to as the "Trust Agreement"; and

WHEREAS, the Grantor desires to amend the Trust Agreement in the manner stipulated herein.

NOW, THEREFORE,

FOR AND IN CONSIDERATION OF the premises and the covenants set forth herein, the receipt, adequacy and sufficiency of all of which being hereby irrevocably acknowledged and confessed, the Grantor and Trustee hereby agree as follows:

1. The name of the Trustee "Bank of Mississippi" is hereby changed throughout the instrument to be the current name of the Trustee, "BankcorpSouth Bank."

2. All references in the Trust Agreement to the "Mississippi Department of Natural Resources," is hereby changed to reflect the current beneficiary agency as the "Mississippi Department of Environmental Quality."

3. All references in the Trust Agreement to the "EPA Regional Administrator" is hereby changed to the "Mississippi Department of Environmental Quality."

4. In all other respects, the said Trust Agreement is hereby readopted and reaffirmed as originally written except as amended hereinabove.

IN WITNESS WHEREOF, the parties have caused this Amendment to be executed by their respective officers, duly authorized, and their corporate seals to be hereunto affixed and attested as of the date first above written. The parties below certify, to the best of their knowledge, that the wording of this Amendment is identical to the wording specified in the Mississippi Hazardous Waste Regulations Rule 264.151(a)(1), as such regulations were constituted on the date first above written.

GRANTOR:

AMERICAN WOOD, DIVISION OF POWE TIMBER COMPANY, INC.

BY: _____
WILLIAM A. POWE, JR., President

TRUSTEE:

BANCORPSOUTH BANK

BY: _____
LARRY WATSON, Senior Vice President

STATE OF MISSISSIPPI
COUNTY OF Lamar

Personally appeared before me, the undersigned authority in and for the said county and state, on this 10th day of June, 2009, within my jurisdiction, the within named **WILLIAM A. POWE, JR.**, who acknowledged that he is **PRESIDENT OF AMERICAN WOOD, DIVISION OF POWE TIMBER COMPANY, INC.** a Mississippi corporation, and that for and on behalf of the said corporation, and as its act and deed he executed the above and foregoing instrument, after first having been duly authorized by said corporation so to do.

_____
NOTARY PUBLIC

My commission expires:

_____

STATE OF MISSISSIPPI
NOTARY PUBLIC
ID #10273
SUE S. DENSON
Commission Expires
Aug. 10, 2011
LAMAR COUNTY

STATE OF MISSISSIPPI
COUNTY OF Forrest

Personally appeared before me, the undersigned authority in and for the said county and state, on this 11th day of June, 2009, within my jurisdiction, the within named **LARRY WATSON**, who acknowledged that he is **SENIOR VICE PRESIDENT of BANCORPSOUTH BANK,** a Mississippi banking corporation, and that for and on behalf of the said corporation, and as its act and deed he executed the above and foregoing instrument, after first having been duly authorized by said corporation so to do.

Brenda W. Wells
NOTARY PUBLIC

My commission expires:

STATE OF MISSISSIPPI
BRENDA W. WELLS
NOTARY PUBLIC
ID No 60544
Comm Expires
August 28, 2012
FORREST COUNTY

MISSISSIPPI HAZARDOUS WASTE
TRUST FUND AGREEMENT
MISSISSIPPI HAZARDOUS WASTE REGULATIONS RULE 264.151(a)

The "Agreement" entered into as of 8/5, 1992 by and betwee American Wood, Division of Powe Timber Company, Inc., a Mississipp corporation, the "Grantor", and Bank of Mississippi, the "Trustee".

Whereas, the Mississippi Department of Natural Resources, "MS. DNR", an agency of the State of Mississippi, has established certain regulation applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility shall provide assurance that funds wil be available when needed for closure and/or post-closure care of the facility,

Whereas, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein,

Whereas, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as trustee,

Now, therefore, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

(a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.

(b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified on attached Schedule A and Schedule B.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund", for the benefit of the Mississippi Department of Natural Resources. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule C attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by the Mississippi Department of Natural Resources.

Section 4. Payment for Closure and Post-Closure Care. The Trustee shall make payments from the Fund as the Executive Director, Mississippi Department of Natural Resources, shall direct, in writing, to provide for the payment of the costs of closure and/or post-closure care of the facilities covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the Executive Director, Mississippi Department of Natural Resources, from the Fund for closure and post-closure expenditures in such amounts as the Executive Director, Mississippi Department of Natural Resources shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the Executive Director, Mississippi Department of Natural Resources specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that:

(i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80a-2.(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or State government;

(ii) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State government; and

(iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

(a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and

(b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

(a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;

(b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;

(c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depositary even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depositary with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency of instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

(d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and

(e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

Section 10. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish

to the Grantor and to the Executive Director, Mississippi Department o Natural Resources, a statement confirming the value of the Trust. An securities in the Fund shall be valued at market value as of no more tha 60 days prior to the anniversary date of establishment of the Fund. Th failure of the Grantor to object in writing to the Trustee within 90 day after the statement has been furnished to the Grantor and the Executiv Director, Mississippi Department of Natural Resources shall constitute conclusively binding assent by the Grantor, barring the Grantor fro asserting any claim or liability against the Trustee with respect t matters disclosed in the statement.

Section 11. Advice of Counsel. The Trustee may from time to tim consult with counsel, who may be counsel to the Grantor, with respect t any question arising as to the construction of this Agreement or any actio to be taken hereunder. The Trustee shall be fully protected, to the exten permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation. The Trustee shall be entitled t reasonable compensation for its services as agreed upon in writing fro time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor Trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upo the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the Executive Director, Mississippi Department of Natural Resources, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 14. Instructions to the Trustee. All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the Executive Director, Mississippi Department of Natural Resources to the Trustee shall be in writing, signed by the Executive Director, Mississippi Department of Natural Resources, or his designee, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or the Mississippi Department of Natural Resources hereunder has occurred. The Trustee shall

have no duty to act in the absence of such orders, requests, a instructions from the Grantor and/or the Mississippi Department of Natur Resources, except as provided for herein.

Section 15. Notice of Nonpayment. The Trustee shall notify t Grantor and the Executive Director, Mississippi Department of Natur Resources, by certified mail within 10 days following the expiration of t 30-day period after the anniversary of the establishment of the Trust, no payment is received from the Grantor during that period. After the pa in period is completed, the Trustee shall not be required to send a noti of nonpayment.

Section 16. Amendment of Agreement. This Agreement may be amended an instrument in writing executed by the Grantor, the Trustee, and t Executive Director, Mississippi Department of Natural Resources, or by t Trustee and the appropriate EPA Regional Administrator if the Grant ceases to exist.

Section 17. Irrevocability and Termination. Subject to the right the parties to amend this Agreement as provided in Section 16, this Tru shall be irrevocable and shall continue until terminated at the writt agreement of the Grantor, the Trustee, and the Executive Directo Mississippi Department of Natural Resources, or by the trustee and t Executive Director, Mississippi Department of Natural Resources, if t Grantor ceases to exist. Upon termination of the Trust, all remaini trust property, less final trust administration expenses, shall delivered to the Grantor.

Section 18. Immunity and indemnification. The Trustee shall n incur personal liability of any nature in connection with any act omission, made in good faith, in the administration of this Trust, or carrying out any directions by the Grantor or the Executive Directo Mississippi Department of Natural Resources issued in accordance with th Agreement. The Trustee shall be indemnified and saved harmless by t Grantor or from the Trust Fund, or both, from and against any persona liability to which the Trustee may be subjected by reason of any act conduct in its official capacity, including all expenses reasonab incurred in its defense in the event the Grantor fails to provide suc defense.

Section 19. Choice of Law. This Agreement shall be administere construed, and enforced according to the laws of the State of Mississippi.

Section 20. Interpretation. As used in this Agreement, words in t singular include the plural and words in the plural include the singula The descriptive headings for each section of this Agreement shall n affect the interpretation or the legal efficacy of this Agreement.

IN WITNESS WHEREOF the parties have caused this Agreement to executed by their respective officers duly authorized and their corporat seals to be hereunto affixed and attested as of the date first abo written. The parties below certify, to the best of their knowledge, tha the wording of this Agreement is identical to the wording specified in t

Mississippi Hazardous Waste Regulations Rule 264.151 (a) (1) as suc regulations were constituted on the date first above written.

(Signature of Grantor)

V. P.
(Title)

Attest: William R. Lowe Jr
President
(Title)

(Signature of Trustee)

Attest: Joann Speight
Vice President
(Title)

(Seal)

State of Mississippi

County of Forrest

On this day, August 5, 1992, before me personally came Charles A Rogers to me known, who, being by me duly sworn, did depose and say that h resides at 605 Woodland Hills Drive, Hattiesburg, Mississippi 39401, tha he is Vice President and General Manager of Powe Timber Company, Inc., th corporation described in and which executed the above instrument; that h knows the seal of said corporation; that the seal affixed to suc instrument is such corporate seal; that it was so affixed by order of th Board of Directors of said corporation, and that he signed his name theret by like order.

Mary Pauline Murphy
(Notary Public)

My Commission Expires: May 26, 1993

SCHEDULE A

This Agreement demonstrates financial assurance for the following cost estimate(s) for the following facility(ies):

U. S. Environmental Protection Agency Identification Number of Facility	Name of Facility	Address of Facility	Cost Estimates for Which Financial Assurance Being Demonstrated by This Agreement
MSD021019914	American Wood/ Richton	Hwy 15 N. Richton, MS	Post Closure $87,450.00
* MSD021019914	American Wood/ Richton	Hwy 15 N. Richton, MS	Corrective Action $455,037.00

* $15,200.00 Each year for 15 yrs

Deposit 8/2/92 $15,200 year 1

15,200 year 2

SCHEDULE B

This Agreement demonstrates financial assurance for the following cost estimates(s) for the following facility(ies):

U. S. Environmental Protection Agency Identification Number of Facility	Name of Facility	Address of Facility	Cost Estimates for Which Financial Assurance Being Demonstrated by This Agreement
MSD021019914	American Wood/ Richton	Hwy. 15 N. Richton, MS	Post Closure Trust Fund Cash/$87,450.
MSD021019914	American Wood/ Richton	Hwy. 15 N. Richton, MS	Corrective Action Trust Fund Cash/$15,200.

ATTACHMENT H

Survey Plats, Deeds, and Notices

(RCRA Part B Application, Exhibit 9)

JACKSON, PITTMAN, SELLERS & HOLLIMON
ATTORNEYS AT LAW
214 SOUTH 28th AVENUE
HATTIESBURG, MISSISSIPPI 39401

ROBERT T. JACKSON
JACK H. PITTMAN
JAN W. SELLERS
JEFFREY T. HOLLIMON

REPLY TO:
P.O. DRAWER 17138
HATTIESBURG, MS 39402

TELEPHONE
(601) 264 - 3309

January 12, 1988

Mr. Charles Rogers
American Wood
P. O. Box 1532
Hattiesburg, MS 39401

Dear Charles:

Enclosed herewith is the original of the Affidavit which was recently prepared for and signed by you as vice president of Powe Timber Company, d/b/a American Wood, pertaining to property located at Richton, Perry County, Mississippi.

This Affidavit has been recorded in Deed Record No. 77 at Pages 342-45 in the office of the Chancery Clerk of Perry County, Mississippi.

Enclosed is Alfred Lott's bill for filing fees. We would appreciate your mailing a check directly to Mr. Lott in payment of this fee.

Thank you.

Sincerely yours,

Robert T. Jackson

RTJ:PM

Encls.

STATE OF MISSISSIPPI

COUNTY OF FORREST

AFFIDAVIT

PERSONALLY CAME AND APPEARED before me, the undersigned authority in and for the aforesaid County and State, Charles A. Rogers, who, after being first by me duly sworn, stated on his oath the following:

1. My name is Charles A. Rogers and I am Vice-President of Powe Timber Company, d/b/a American Wood, Hattiesburg, Mississippi.

2. The Corporation currently owns property located at Richton, Perry County, Mississippi, described as follows:

PARCEL 1:

Commencing at the N.W. Corner of NE/4 of NW/4, Section 31, T5N-R9W, Perry County, Mississippi; Thence run South 1,146.62 feet; Thence run East 555.73 feet to the POINT OF BEGINNING; Thence run S 02 degrees 24' E 91.11 feet; Thence run N 88 degrees 21' E 50.04 feet; Thence run N 03 degrees 31' W 93.81 feet; Thence run S 85 degrees 13' W 48.28 feet back to the POINT OF BEGINNING.

Containing 0.104 acres, more or less.

PARCEL 2:

Commencing at the N.W. Corner of NE/4 of NW/4, Section 31, T5N, R9W, Perry County, Mississippi; Thence run South 1,038.14 feet; Thence run East 553.60 feet to the POINT OF BEGINNING; Thence run S 89 degrees 56' E 56.17 feet; Thence run South 14 degrees 26' E 36.63 feet; Thence run N 89 degrees 02' E 35.19 feet; Thence run S 10 degrees 33' E 70.56 feet; Thence run N 69 degrees 37' W 81.83 feet; Thence run N 06 degrees 40' W 48.61 feet; Thence run N 89 degrees 01' W 29.96 feet; Thence run N 02 degrees 20' W 27.08 feet back to the POINT OF BEGINNING.

Containing 0.132 acres, more or less.

A survey of that property prepared by Batson and Brown, Inc., Consulting Engineers, is attached hereto and marked Exhibit "A."

3. The Company hereby provides notice that the above described land has been used to manage hazardous waste.

4. The future use of the above described land is restricted under the provisions of 40 CFR Subpart G.

5. A copy of the attached survey plat has been filed with the local zoning authority.

6. This Company hereby provides notice and assurance that these hazardous waste sites shall not be disturbed in accordance with the provisions of 40 CFR Part 265.117 (c).

7. In accordance with the provisions of CFR Part 265.119, Powe Timber Company d/b/a American Wood hereby submits that no wastes were left in place in the closed impoundments identified hereinabove, but that the underlying soils still contain constituents of K001 waste.

WITNESS MY SIGNATURE on this, the 17 day of December, 1987.

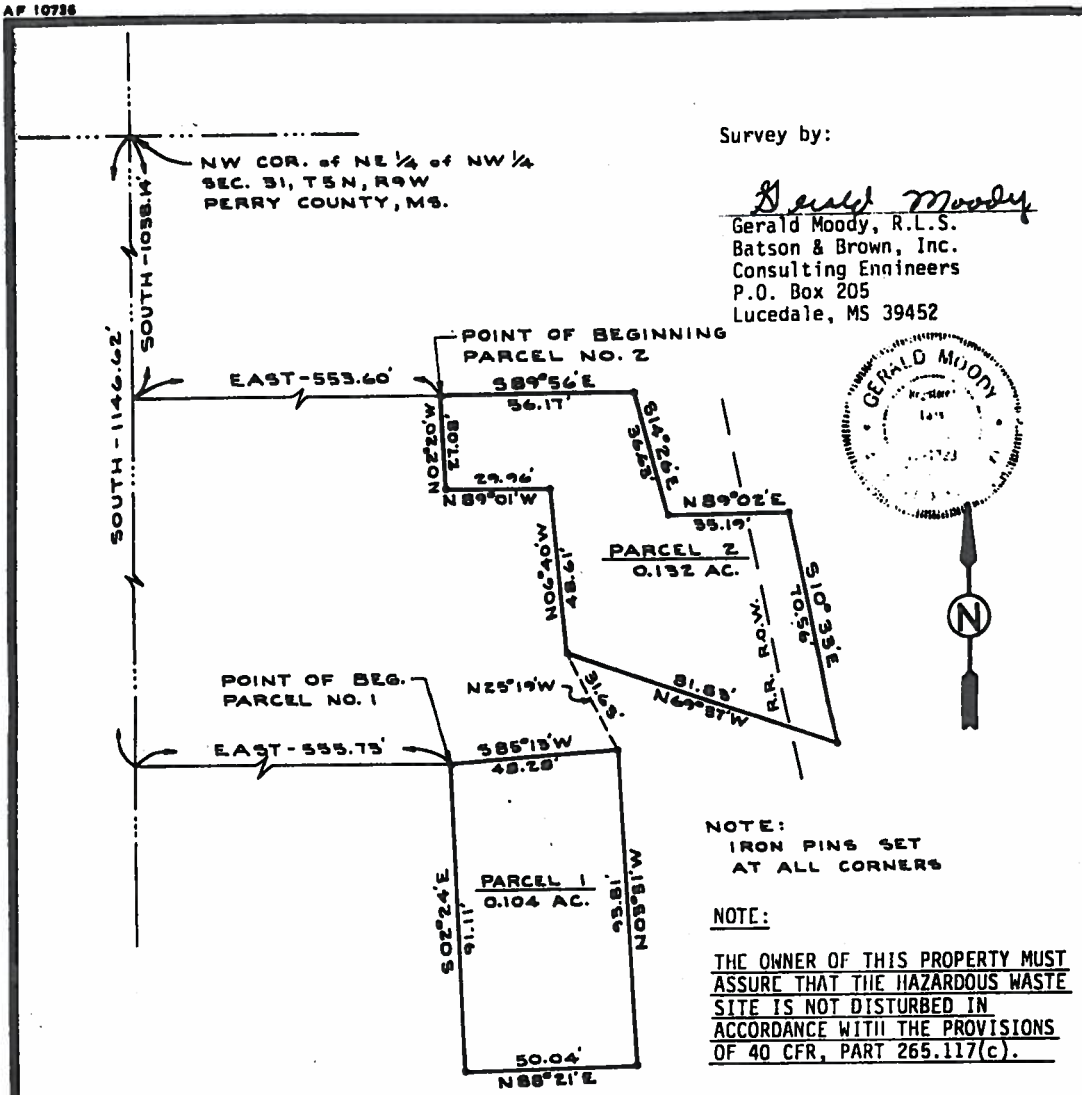
CHARLES A. ROGERS,
VICE-PRESIDENT
POWE TIMBER COMPANY D/B/A
AMERICAN WOOD

SWORN TO AND SUBSCRIBED BEFORE ME ON THIS, THE 17th DAY OF December, 1987.

NOTARY PUBLIC

MY COMMISSION EXPIRES:
10-30-91

AF 10736



NOTE:
IRON PINS SET
AT ALL CORNERS

NOTE:

THE OWNER OF THIS PROPERTY MUST ASSURE THAT THE HAZARDOUS WASTE SITE IS NOT DISTURBED IN ACCORDANCE WITH THE PROVISIONS OF 40 CFR, PART 265.117(c).

DESCRIPTION: - Parcel #1

Commencing at the N.W. Corner of NE¼ of NW¼, Section 31, T5N, R9W, Perry County, Mississippi; Thence run South 1,146.62 feet; Thence run East 555.73 feet to the POINT OF BEGINNING; Thence run S 02°24' E 91.11 feet; Thence run N 88°21' E 50.04 feet; Thence run N 03°31' W 93.81 feet; Thence run S 85°13' W 48.28 feet back to the POINT OF BEGINNING.

Containing 0.104 acres, more or less.

DESCRIPTION: - Parcel #2

Commencing at the N.W. Corner of NE¼ of NW¼, Section 31, T5N, R9W, Perry County, Mississippi; Thence run South 1,038.14 feet; Thence run East 553.60 feet to the POINT OF BEGINNING; Thence run S 89°56' E 56.17 feet; Thence run S 14°26' E 36.63 feet; Thence run N 89°02' E 35.19 feet; Thence run S 10°33' E 70.56 feet; Thence run N 69°37' W 81.83 feet; Thence run N 06°40' W 48.61 feet; Thence run N 89°01' W 29.96 feet; Thence run N 02°20' W 27.08 feet back to the POINT OF BEGINNING.

Containing 0.132 acres, more or less.

HAZARDOUS WASTE AREAS
AMERICAN WOOD PLANT
RICHTON MS.

SCALE: 1" = 50'	BATSON AND BROWN, INC. CONSULTING ENGINEERS
SURVEYED: 1-15-87	WIGGINS ☐ LUCEDALE ☐ PASCAGOULA, MISSISSIPPI
DRAWN: 1-20-87	

86T04

STATE OF MISSISSIPPI
COUNTY OF PERRY

NOTICE OF CONTAMINATION OF WOOD PRESERVATIVE CONSTITUENTS

THIS NOTICE OF CONTAMINATION OF WOOD PRESERVATIVE CONSTITUENTS is made and entered into as of this 3rd day of OCTOBER, 1997, by POWE TIMBER COMPANY, INC., a Mississippi Corporation, d/b/a AMERICAN WOOD.

WHEREAS, POWE TIMBER COMPANY, INC. owns 0.343 acres, more or less, more particularly described in Exhibit "A", attached hereto and made a part hereof as if copied at length herein; and

WHEREAS, said property is contaminated with wood preservative constituents; and

WHEREAS, POWE TIMBER COMPANY, INC., has provided a protective clay cap and cover over the property as required by the Mississippi State Department of Environmental Quality and the U. S. Environmental Protection Agency and wishes to provide notice of the said wood preservative constituents.

NOW, THEREFORE,

POWE TIMBER COMPANY, INC., a Mississippi Corporation, d/b/a AMERICAN WOOD, hereby provides notice that the area described in Exhibit "A" attached hereto is contaminated with wood preservative constituents. The protective cap covering this area should not be disturbed and any future use of the area must be approved by the Mississippi State Department of Environmental Quality and the U. S. Environmental Protection Agency.

WITNESS THE SIGNATURE of the duly authorized and empowered officer of **POWE TIMBER COMPANY, INC.** as of the date first written hereinabove.

DECLARANT:

POWE TIMBER COMPANY, INC.,
a Mississippi Corporation,
d/b/a **AMERICAN WOOD**

by: William A. Powe Jr.
WILLIAM A. POWE, JR., President

STATE OF MISSISSIPPI
COUNTY OF Lamar

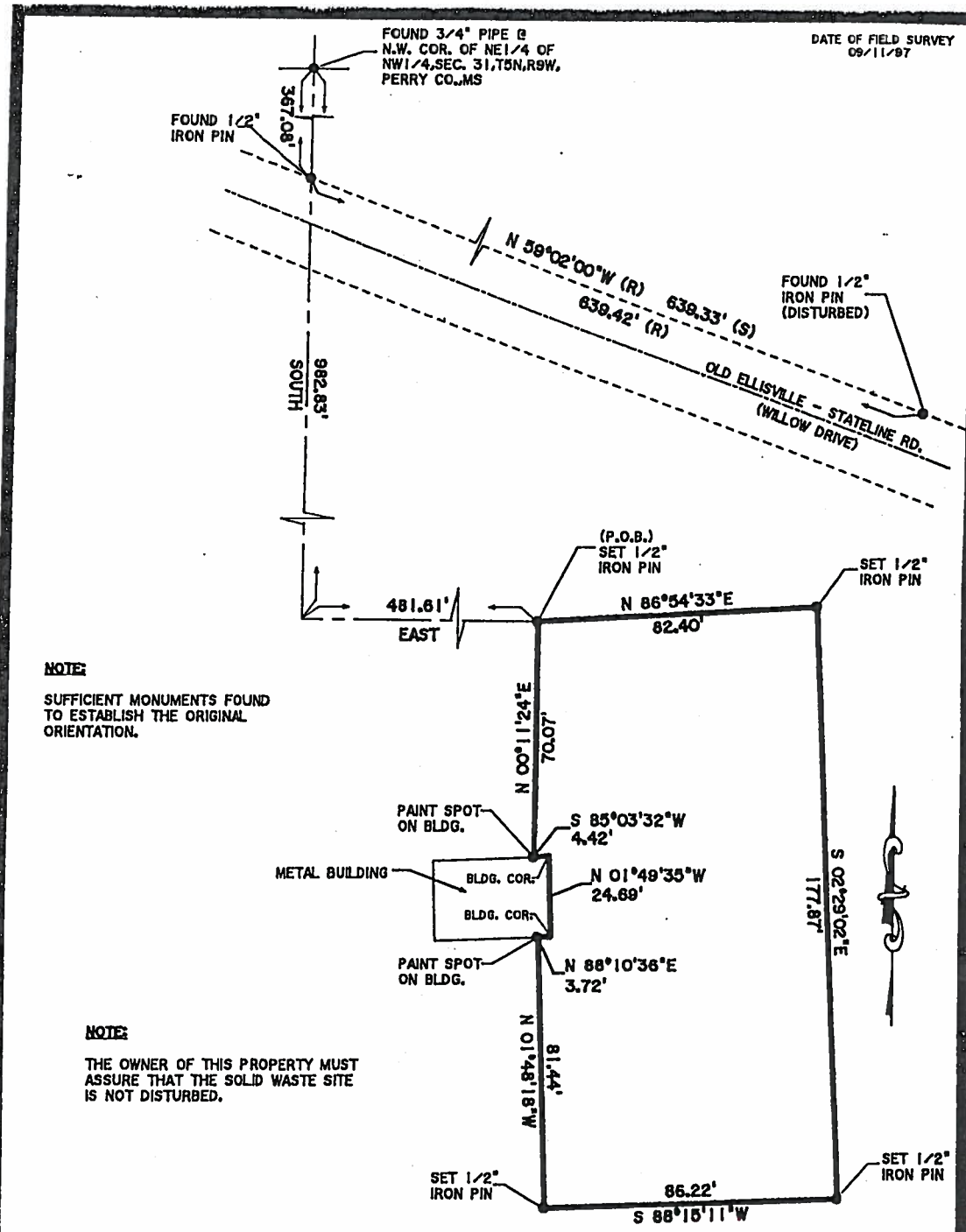
PERSONALLY appeared before me, the undersigned authority in and for the said county and state, on this 31st day of October, 1997, within my jurisdiction, the within named **WILLIAM A. POWE, JR.**, who acknowledged that he is **President** of **POWE TIMBER COMPANY, INC.**, a Mississippi Corporation, d/b/a **AMERICAN WOOD**, and that in said representative capacity he executed the above and foregoing instrument, after first having been duly authorized so to do.

Tuby Lynn Faus
NOTARY PUBLIC

My Commission Expires:
MISSISSIPPI STATEWIDE NOTARY PUBLIC
MY COMMISSION EXPIRES:
BONDED THRU STATED NOTARY BONDING

INDEXING INSTRUCTIONS FOR PERRY COUNTY CHANCERY CLERK FOR INDEXING:

NE-1/4 of NW-1/4, Section 31, Township 5 North, Range 9 West,
Perry County, Mississippi



NOTE:

SUFFICIENT MONUMENTS FOUND TO ESTABLISH THE ORIGINAL ORIENTATION.

NOTE:

THE OWNER OF THIS PROPERTY MUST ASSURE THAT THE SOLID WASTE SITE IS NOT DISTURBED.

DESCRIPTION

A PARCEL OF LAND SITUATED IN THE NW1/4 OF SECTION 31,T5N,R9W,PERRY CO.,MS.,BEING MORE PARTICULARLY DESCRIBED AS:

COMMENCING AT A FOUND 3/4" PIPE AT THE N.W. CORNER OF THE NE1/4 OF NW1/4,SAID SECTION,TOWNSHIP AND RANGE,THENCE RUN SOUTH 982.83 FT.,THENCE RUN EAST 481.61 FT. TO A SET 1/2" IRON PIN AND THE POINT OF BEGINNING,THENCE RUN N 86°54'33"E 82.40 FT. TO A SET 1/2" IRON PIN,THENCE RUN S 02°29'02"E 177.87 FT. TO A SET 1/2" IRON PIN,THENCE RUN S 88°15'11"W 86.22 FT. TO A SET 1/2" IRON PIN,THENCE RUN N 01°48'18"W 81.44 FT. TO A PAINTED SPOT ON THE SOUTH SIDE OF A METAL BUILDING,THENCE RUN N 88°10'36"E 3.72 FT. ALONG SAID SIDE OF SAID BUILDING TO THE S.E. CORNER OF SAID BUILDING,THENCE RUN N 01°49'35"W 24.69 FT. ALONG THE EAST LINE OF SAID BUILDING TO THE NE CORNER OF SAID BUILDING,THENCE RUN S 85°03'32"W 4.42 FT. ALONG THE NORTH SIDE OF SAID BUILDING TO A PAINTED SPOT ON SAID SIDE OF SAID BUILDING,THENCE RUN N 00°11'24"E 70.07 FT. BACK TO THE POINT OF BEGINNING,CONTAINING 0.343 ACRES MORE OR LESS.

GERALD MOODY
Registered
Land
Surveyor
STATE OF MISSISSIPPI

GERALD MOODY P.L.S.

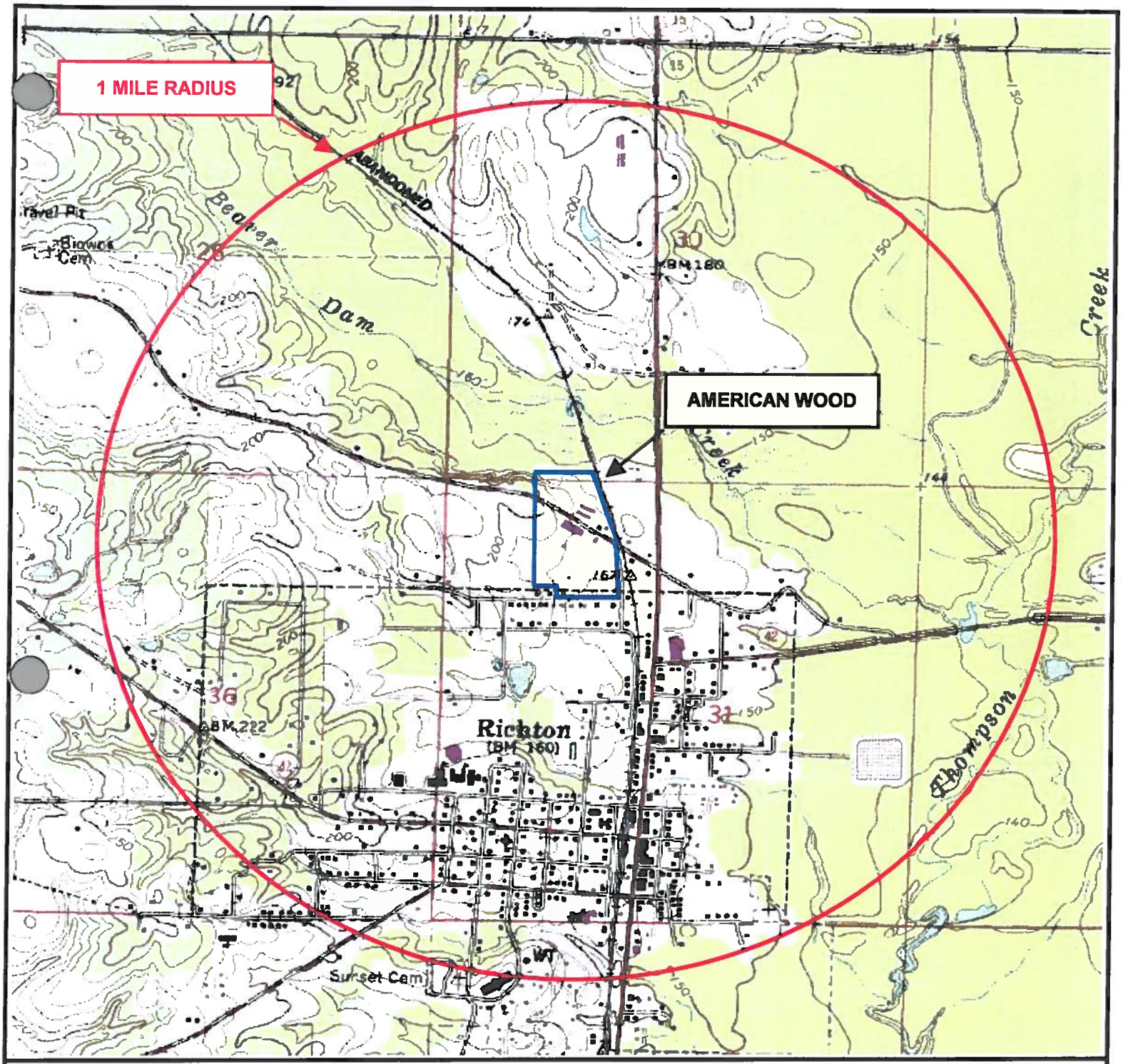
AMWOOD

MOODY AND ASSOCIATES, INC. REGISTERED, PROFESSIONAL SURVEYORS ALABAMA, LOUISIANA, MISSISSIPPI 281 RATLIFF STREET LUCEDALE MS. 39452 601-947-4499	DATE 09/15/97
	SCALE 1" = 40'
PLAT OF SURVEY FOR: SOLID WASTE AREAS AMERICAN WOOD PLANT	CLASS
SITUATED IN : SECTION 31,T5N,R9W, PERRY CO.,MS	

FIGURE 1

Site Topographic Map

(RCRA Part B Application, Exhibit 1)

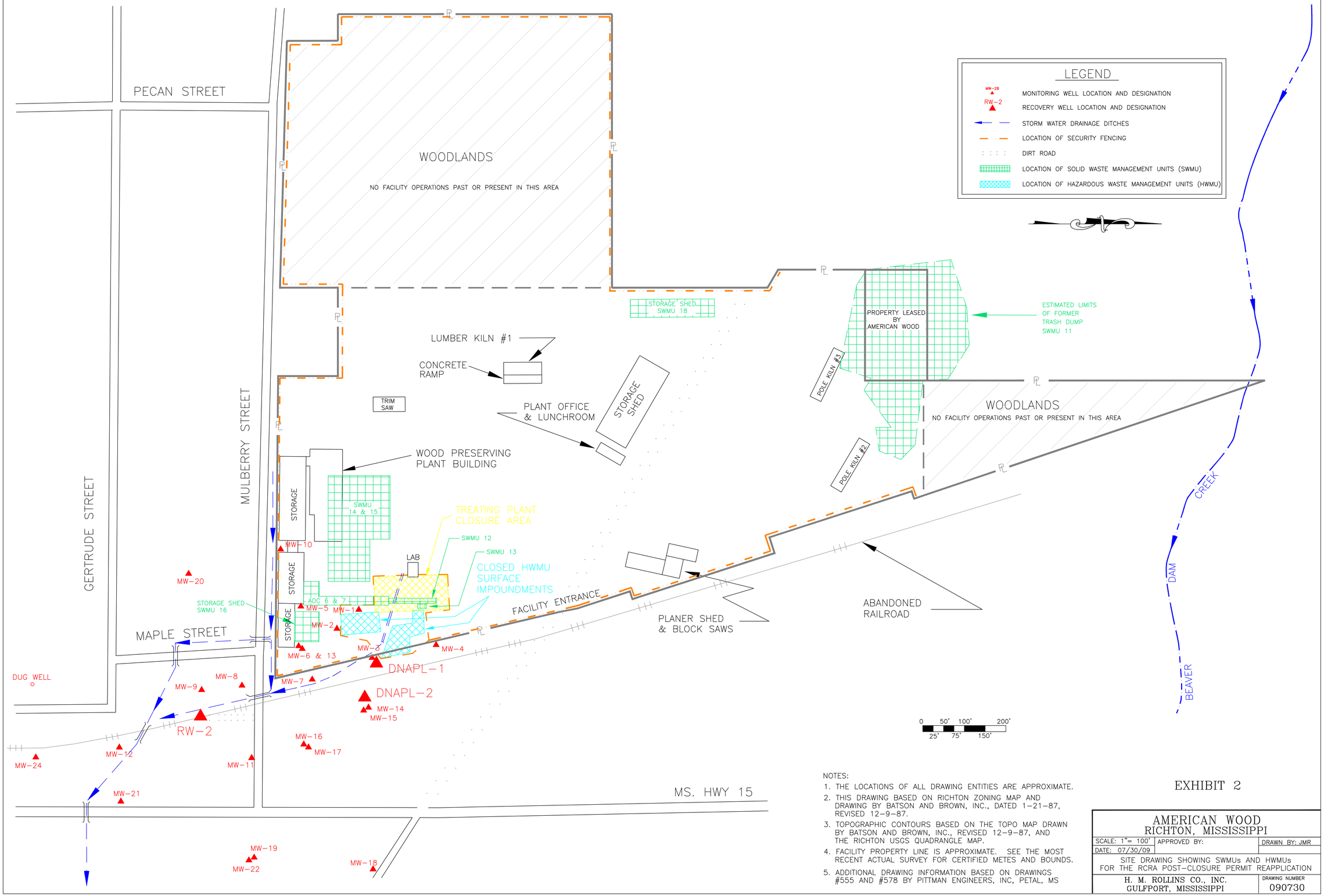


AMERICAN WOOD RICHTON, MISSISSIPPI	
U.S.G.S. TOPOGRAPHIC MAP QUAD: RICHTON	
	H.M. ROLLINS CO., INC. GULFPORT, MS

FIGURE 2

Site Layout Drawing

(RCRA Part B Application, Exhibit 2)



NOTES:

1. THE LOCATIONS OF ALL DRAWING ENTITIES ARE APPROXIMATE.
2. THIS DRAWING BASED ON RICHTON ZONING MAP AND DRAWING BY BATSON AND BROWN, INC., DATED 1-21-87, REVISED 12-9-87.
3. TOPOGRAPHIC CONTOURS BASED ON THE TOPO MAP DRAWN BY BATSON AND BROWN, INC., REVISED 12-9-87, AND THE RICHTON USGS QUADRANGLE MAP.
4. FACILITY PROPERTY LINE IS APPROXIMATE. SEE THE MOST RECENT ACTUAL SURVEY FOR CERTIFIED METES AND BOUNDS.
5. ADDITIONAL DRAWING INFORMATION BASED ON DRAWINGS #555 AND #578 BY PITTMAN ENGINEERS, INC, PETAL, MS

EXHIBIT 2

AMERICAN WOOD
RICHTON, MISSISSIPPI

SCALE: 1"= 100'	APPROVED BY:	DRAWN BY: JMR
DATE: 07/30/09		

SITE DRAWING SHOWING SWMUs AND HWMUs FOR THE RCRA POST-CLOSURE PERMIT REAPPLICATION

H. M. ROLLINS CO., INC.
GULFPORT, MISSISSIPPI

DRAWING NUMBER
090730

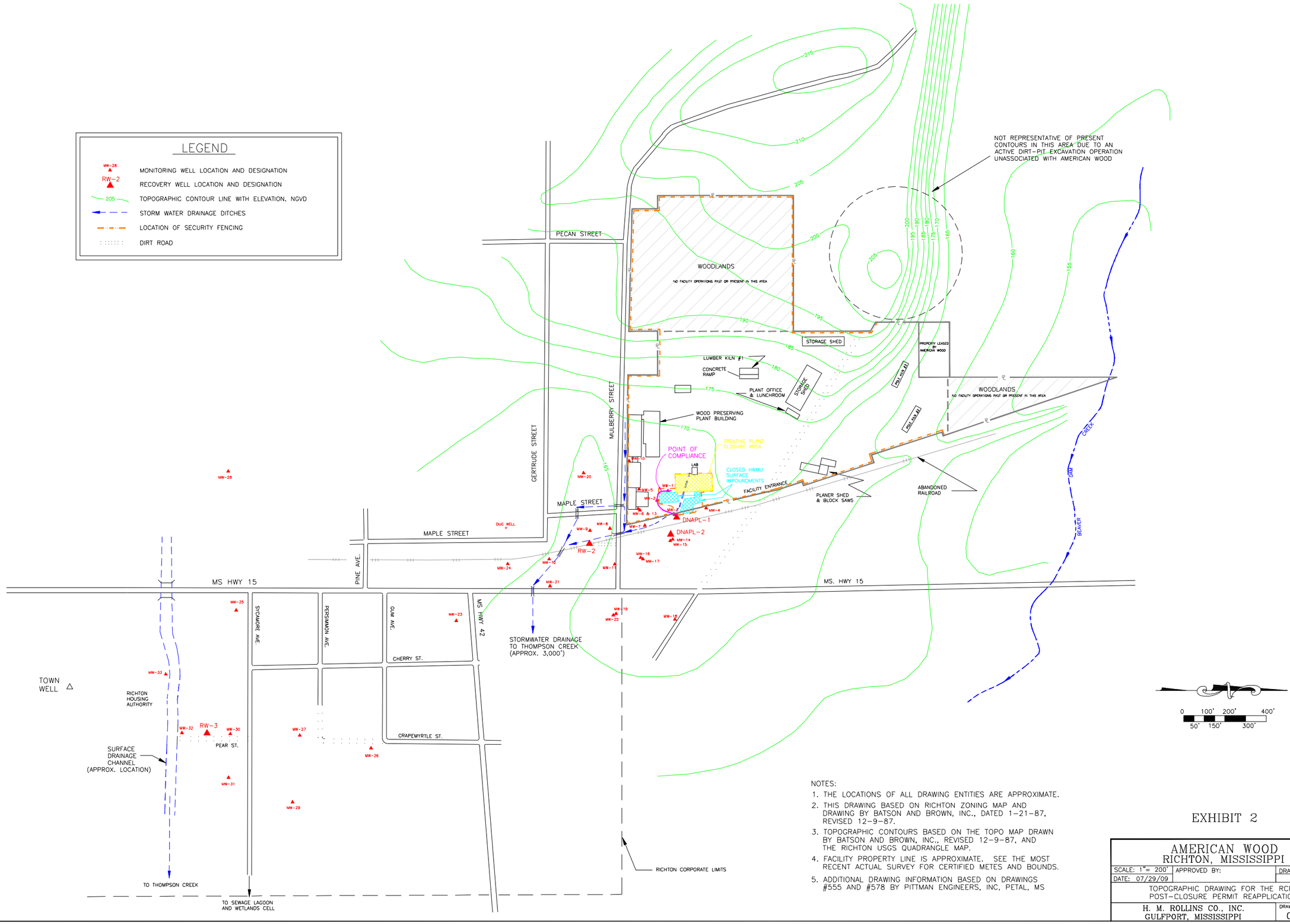
FIGURE 3

Site Topographic Drawing

(RCRA Part B Application, Exhibit 2)

LEGEND

- MW-28 / RW-2 — MONITORING WELL LOCATION AND DESIGNATION
- RECOVERY WELL LOCATION AND DESIGNATION
- 205 — TOPOGRAPHIC CONTOUR LINE WITH ELEVATION, NGVD
- STORM WATER DRAINAGE DITCHES
- LOCATION OF SECURITY FENCING
- DIRT ROAD



NOTES:

1. THE LOCATIONS OF ALL DRAWING ENTITIES ARE APPROXIMATE.
2. THIS DRAWING BASED ON RICHTON ZONING MAP AND DRAWING BY BATSON AND BROWN, INC., DATED 1-21-87, REVISED 12-9-87.
3. TOPOGRAPHIC CONTOURS BASED ON THE TOPO MAP DRAWN BY BATSON AND BROWN, INC., REVISED 12-9-87, AND THE RICHTON USGS QUADRANGLE MAP.
4. FACILITY PROPERTY LINE IS APPROXIMATE. SEE THE MOST RECENT ACTUAL SURVEY FOR CERTIFIED METES AND BOUNDS.
5. ADDITIONAL DRAWING INFORMATION BASED ON DRAWINGS #555 AND #578 BY PITTMAN ENGINEERS, INC, PETAL, MS

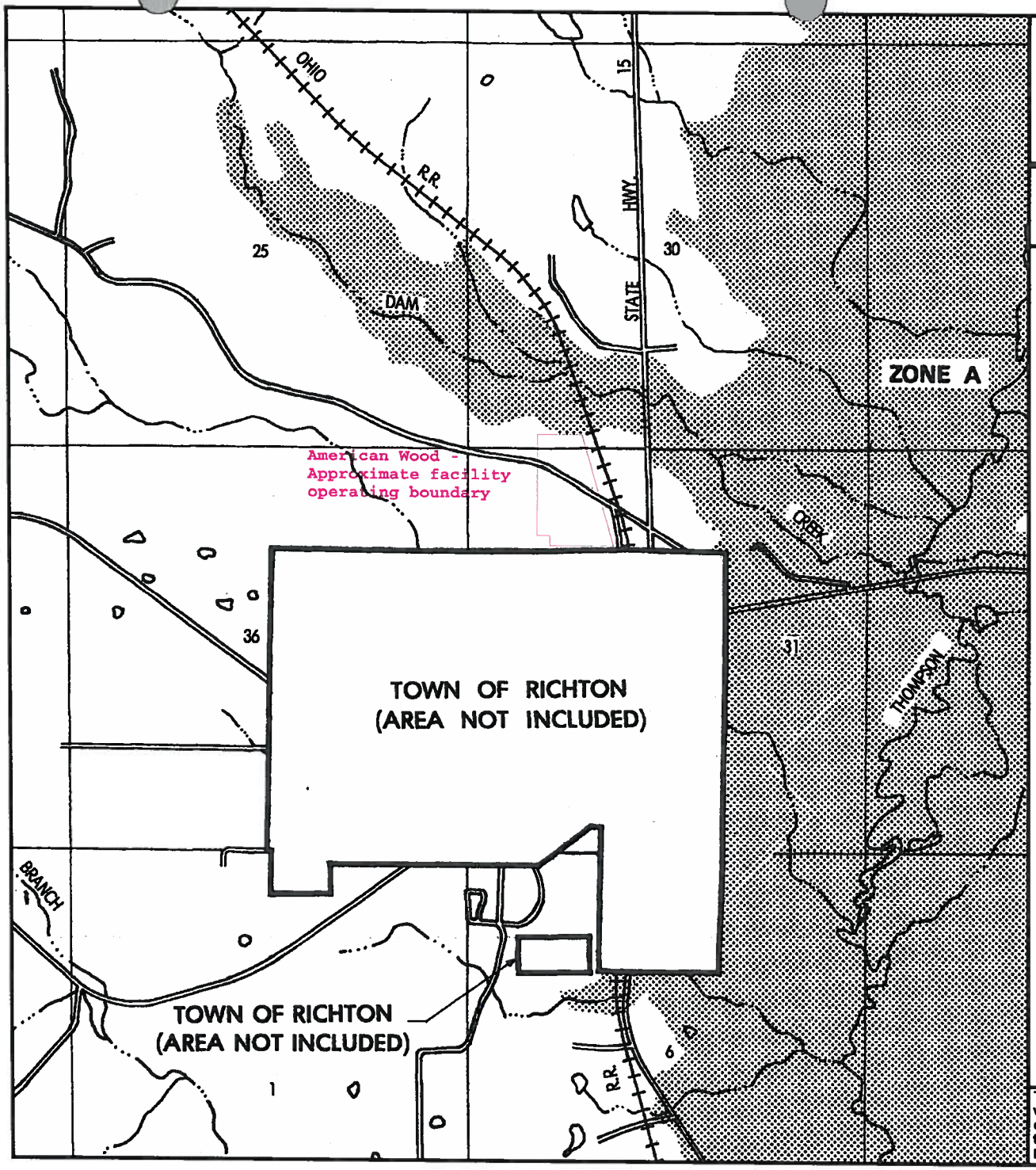
EXHIBIT 2

AMERICAN WOOD RICHTON, MISSISSIPPI		
SCALE: 1"= 200'	APPROVED BY:	DRAWN BY: JMR
DATE: 07/29/09		
TOPOGRAPHIC DRAWING FOR THE RCRA POST-CLOSURE PERMIT REAPPLICATION		
H. M. ROLLINS CO., INC. GULFPORT, MISSISSIPPI		DRAWING NUMBER 090729

FIGURE 4

Flood Plain Map

(RCRA Part B Application, Exhibit 6)



APPROXIMATE SCALE IN FEET

2000 0 2000

NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

PERRY COUNTY, MISSISSIPPI

(UNINCORPORATED AREAS)

PANEL 2 OF 8

COMMUNITY–PANEL NUMBER:
280233 0002 B

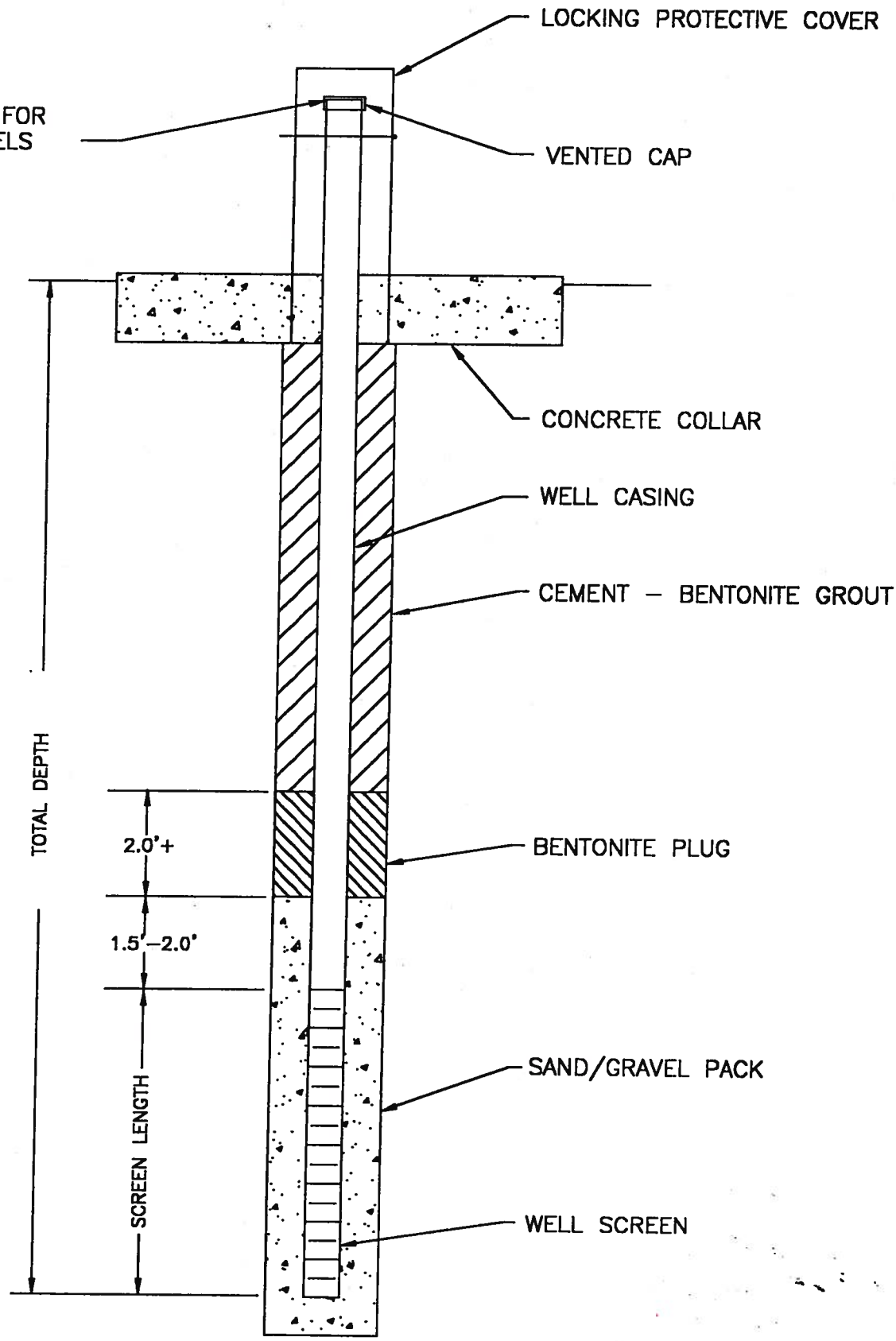
EFFECTIVE DATE:
SEPTEMBER 1, 1987

Federal Emergency Management Agency

FIGURE 5

Typical Well Construction Diagram

(RCRA Part B Application, Exhibit 13)



TYPICAL WELL CONSTRUCTION

AMERICAN WOOD, RICHTON, MISSISSIPPI