



MISSISSIPPI DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

For Coverage under Mississippi's Underground Storage Tank (UST)  
Groundwater Remediation General Permit  
General Permit MSG12 0274

(NUMBER TO BE ASSIGNED BY STATE)

## INSTRUCTIONS

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

### Required Submittals with the USTNOI Include:

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

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

April 29, 2008

Page 1 of 3

THE APPLICANT IS  OWNER  OPERATOR (please check one or both)

### OWNER INFORMATION

Owner Contact Name: Sarah Saucier Position: Authorized Agent  
Owner Company Name: Laurel Oil LLC  
Owner Street (P.O. Box): Post Office Box 3060  
Owner City: Laurel, Mississippi State: MS Zip: 39442  
Owner Phone Number (include area code): (601) 649-3261

### OPERATOR INFORMATION (if different than owner)

Operator Contact Name: B. Gregory Taylor, RPG Position: Senior Project Manager  
Operator Company Name: Neel-Schaffer, Inc.  
Operator Street (P.O. Box): 101 Business Park Drive, Suite A  
Operator City: Ridgeland State: MS Zip: 39157  
Operator Phone Number (include area code): (601) 948-3071 (office)

### FACILITY INFORMATION

Facility Name: RAPAD Express #112  
Mississippi Groundwater Protection Trust Fund Identification Number: 11343  
Physical Site Address (if not available indicate the nearest named road)  
Street: 1251 Hillcrest Drive City: Laurel  
County: Jones Zip: 39440  
Latitude: 31 degrees 40 minutes 16 seconds Longitude: 89 degrees 09 minutes 48 seconds  
Method Used to Determine Lat. & Long. (GPS (Please GPS Facility Entrance) or Map Interpolation): Map Interpolation

## WASTEWATER DISCHARGE INFORMATION

Where is the remediated groundwater proposed to be discharged?  State Waters  Collection/Treatment System

Name of Nearest Receiving Stream: NA

Name of Publicly Owned Treatment Works or Wastewater Authority: City of Laurel

Proposed rate of flow (MGD): 0.003 to 0.02

POTW contact, title and telephone number: Mr. Michael Votta, Water Operator/Manager,  
(601) 650-0027

treatment provided at any outfall? If so, describe: Dual Phase Remediation System-influent groundwater is initially treated by oil  
-water separator. Miscible phase impacted groundwater further treated by air stripping prior to discharge.

## 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 gathered and evaluated 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.

<u>B. Gregory Taylor</u>	<u>6/21/22</u>
Signature <sup>1</sup> (Must be signed by operator when different than owner)	Date Signed
<u>B. Gregory Taylor</u>	<u>Senior Project Manager</u>
Printed Name <sup>1</sup>	Title

<sup>1</sup>This application shall be signed according to the General Permit, Activity 9, T-4, page 19, as follows:

- For a corporation, by a responsible corporate officer.
- For a partnership, by a general partner.
- For a sole proprietorship, by the proprietor.
- For a municipal, state or other public facility, by principal executive officer, the mayor, or ranking elected official.

USTNOI forms must be submitted to:

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

**CONTIGUOUS LANDOWNER NOTIFICATION OF CORRECTIVE  
ACTION AND SUBSEQUENT DISCHARGE OF TREATED  
GROUNDWATER DUE TO LEAKING  
UNDERGROUND STORAGE TANK(S)**  
(see Activity 4, S-7 of the USTGP.)

Underground storage tanks located at 1251 Hillcrest Drive, Laurel,  
Jones County, Mississippi (RAPAD Express #112) [street address with city and county]  
have been determined to have released motor fuel. In order to protect the environment and public health a  
cleanup process must be started. The cleanup involves bringing a trailer contained groundwater treatment  
system to the site, pumping out the contaminated groundwater, treating it and discharging the treated water  
into the city wastewater sewer to be further treated or, in rare cases, to State waters. The recovered fuel is  
disposed at an offsite permitted facility. The average time a unit is on site is thirty-five months.

Neel-Schaffer, Inc. [applicant's name]  
101 Business Park Drive, Suite A, Ridgeland, Mississippi 39157 [address]  
(601) 948-3071 [phone number] is proposing to begin the cleanup process and discharge treated  
groundwater to City of Laurel Publicly Owned Treatment Works [name of  
receiving stream or Publicly Owned Treatment Works or Wastewater Authority]. This notification is to  
provide you with an opportunity to comment to the Mississippi Department of Environmental Quality Permit  
Board before the Board makes a final decision regarding the matter. No discharge of treated groundwater  
will occur unless the Board grants coverage of this activity under the General Permit for Underground  
Storage Tank Groundwater Remediation. This notice has been sent to you by Certified Mail - Return  
Receipt Requested. If you have no comments regarding this proposed facility, no response is necessary and  
the permitting process will continue. If you have any comments, they must be received by the Mississippi  
Department of Environmental Quality within 10 days of receipt of this correspondence. **The Department of  
Environmental Quality is limited in its review of this project to those environmental issues in which  
statutory authority has been given.** If you have any questions you may contact the Service and  
Miscellaneous Branch of MDEQ at (601) 961-5171. Comments are to be mailed to the following address:

**Chief, Environmental Permits Division  
MS Department of Environmental Quality, Office of Pollution Control  
P. O. Box 2261  
Jackson, Mississippi 39225-2261**

March 2006  
Page 1 of 1

# POTW OR WASTEWATER AUTHORITY NOTIFICATION AND APPROVAL FORM

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

## APPLICANT (please print or type)

Neel-Schaffer, Inc. [name of applicant] is applying for coverage under Mississippi's Underground Storage Tank Groundwater Remediation General Permit [**copy attached**]. Neel-Schaffer, Inc. [name of applicant] is proposing to discharge remediated groundwater, associated with a leaking underground petroleum storage tank, from a site located at 1251 Hillcrest Drive, Laurel, Jones County, Mississippi 39440 (RAPAD Express #112) [complete address with county].

Approximately 0.003 to 0.02 [proposed volume in MGD] of treated groundwater will be discharged to City of Laurel [name of local POTW or Authority]. The treated groundwater will be discharged in accordance with the conditions, requirements and limitations of Mississippi's Underground Storage Tank Groundwater Remediation General Permit.

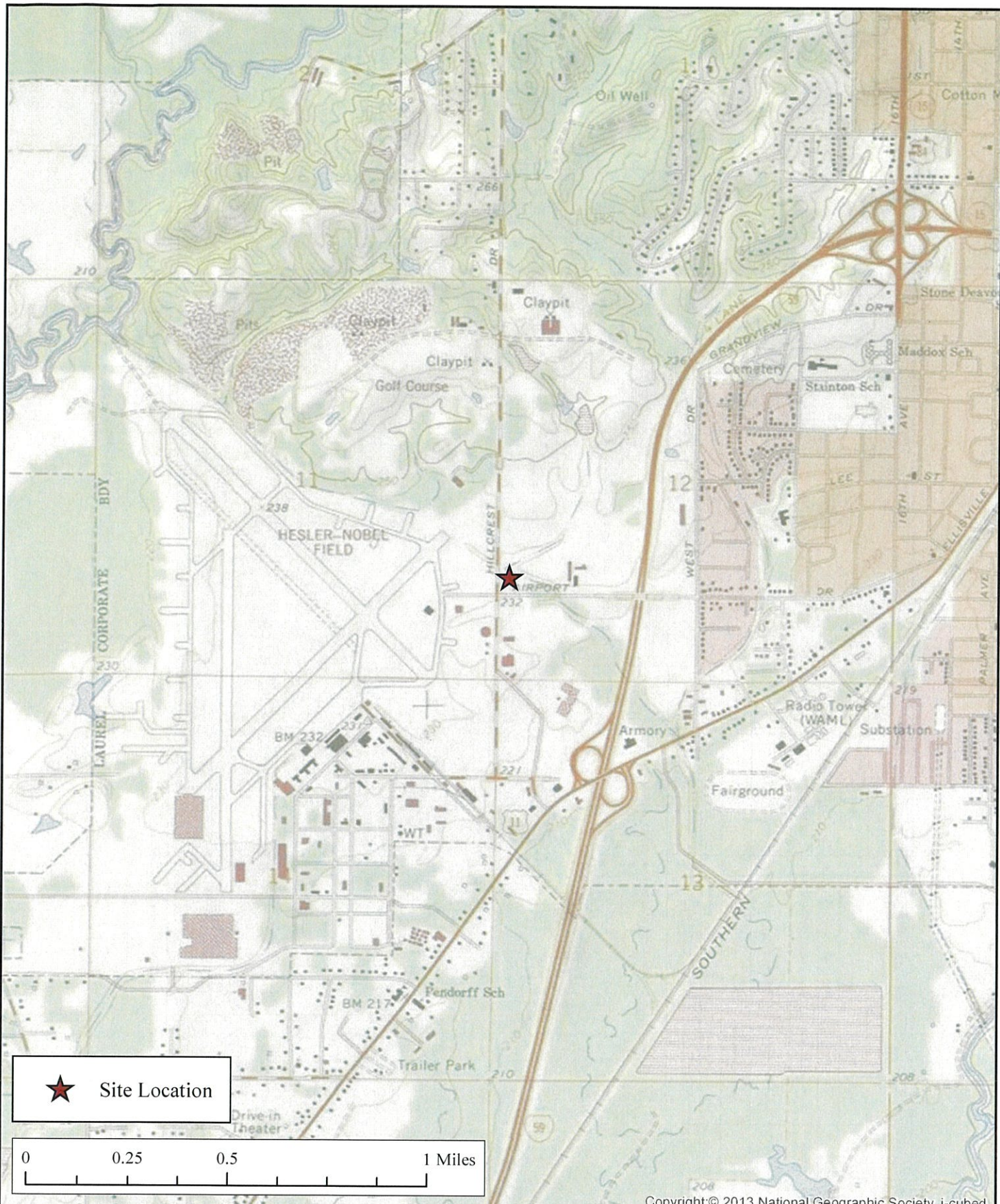
## POTW or WASTEWATER AUTHORITY

The Mississippi Department of Environmental Quality (MDEQ) must receive approval from the local POTW or Wastewater Authority in order for the applicant to obtain coverage under Mississippi's Underground Storage Tank Groundwater Remediation General Permit. Coverage is required prior to discharging remediated groundwater to a POTW or Wastewater Authority. If you have any questions, please contact the Service and Miscellaneous Industries Branch at 601/961-5171.

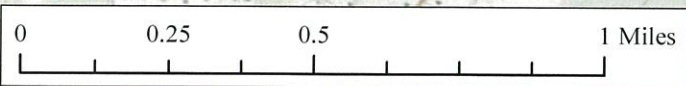
I certify that I am a duly authorized representative of this POTW (or Authority) and directly responsible for managing daily operations. I am familiar with the requirements of the above referenced General Permit and acknowledge that, by signing this form, I am providing MDEQ with written approval of this proposed discharge to our treatment works.

<i>Michael Votta</i>	5/26/2022
POTW (or Authority) Authorized Signature	Date Signed
Michael Votta	Wastewater Supervisor
Printed Name	Title
(601) 650-0027	
Daytime Telephone	

## FIGURES



★ Site Location



Copyright:© 2013 National Geographic Society, i-cubed

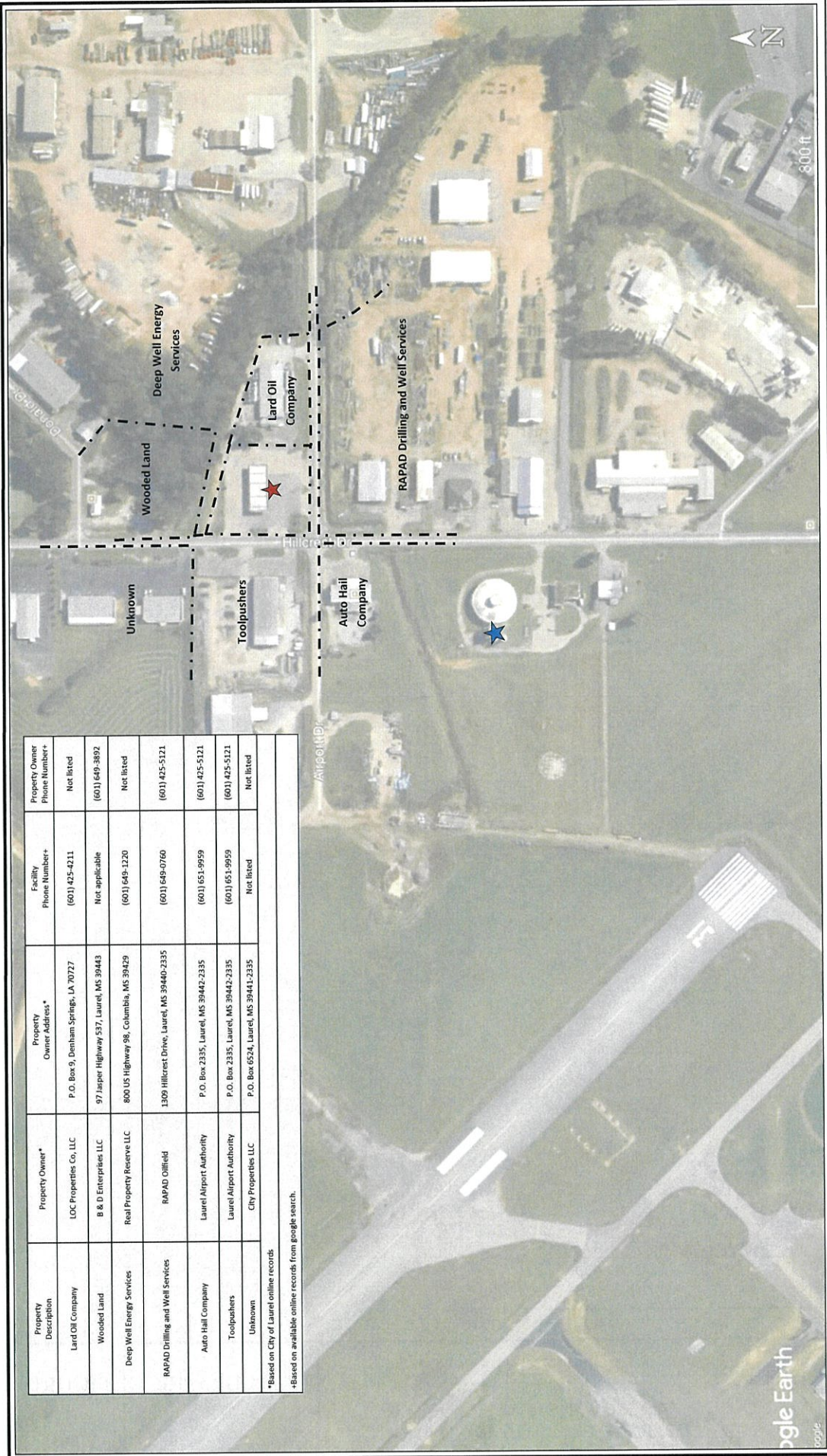
**NEEL-SCHAFFER**  
Solutions you can build upon

RAPAD EXPRESS #112  
1251 HILLCREST DRIVE  
TANK OWNER: LAUREL OIL, LLC  
MGPTF FACILITY ID NO. 11343

TOPOGRAPHIC  
MAP

FIGURE  
1





Property Description	Property Owner*	Property Owner Address*	Facility Phone Number**	Property Owner Phone Number*
Lard Oil Company	LOC Properties Co, LLC	P.O. Box 9, Denham Springs, LA 70727	(601) 425-4211	Not listed
Wooded Land	B & D Enterprises LLC	97 Jasper Highway 537, Laurel, MS 39443	Not applicable	(601) 649-3892
Deep Well Energy Services	Real Property Reserve LLC	800 US Highway 98, Columbia, MS 39429	(601) 649-1220	Not listed
RAPAD Drilling and Well Services	RAPAD Oilfield	1309 Hillcrest Drive, Laurel, MS 39440-2335	(601) 649-0760	(601) 425-5121
Auto Hail Company	Laurel Airport Authority	P.O. Box 2335, Laurel, MS 39442-2335	(601) 651-9959	(601) 425-5121
Toolpushers	Laurel Airport Authority	P.O. Box 2335, Laurel, MS 39442-2335	(601) 651-9959	(601) 425-5121
Unknown	City Properties LLC	P.O. Box 6524, Laurel, MS 39441-2335	Not listed	Not listed

\*Based on City of Laurel online records  
 \*\*Based on available online records from google search.

**RAPAD EXPRESS #112**  
 1251 HILLCREST DRIVE  
 LAUREL, MISSISSIPPI  
 MAGPTE FACILITY ID No. 11343  
 TANK OWNER: LAUREL OIL, LLC

**NEEL-SCHAFFER**  
 Solutions you can build upon

Drawn By:	RTB	06/21/22
Checked By:	HGT	06/21/22

★ RAPAD Express #112, property owner Cedar Hill Holdings, LLC

----- Approximate parcel boundary based on City of Laurel online records

**FIGURE 2**  
 CONTIGUOUS LANDOWNER MAP

Source: Google Earth  
 31°40'16.29" North, 89°49'47.76" West,  
 Date Accessed: 05/19/21

SCALE  
 1" ≈ 410'



**CONTIGUOUS LANDOWNER NOTIFICATION**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

B+D Enterprise LLC  
1151 Hillcrest Drive  
Laurel MS 39443 40



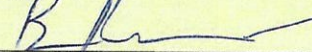
9590 9402 7263 1284 6772 34

2. Article Number (Transfer from service label)

7022 0410 0002 9813 3187

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X   Agent  
 Addressee

B. Received by (Printed Name)

BTD Enterprise LLC

C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

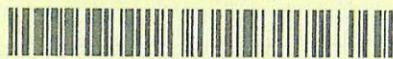
- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

City of Laurel Airport Authority  
PO Box 2335  
Laurel MS 39446  
42



9590 9402 7263 1284 6707 30

2. Article Number (Transfer from service label)

7022 0410 0002 9813 3163

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

- Agent
- Addressee

B. Received by (Printed Name)

Matt Owens

C. Date of Delivery


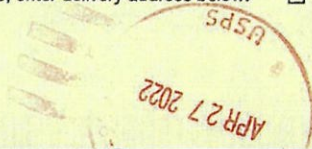
4-25-22

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

(over \$500)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY														
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> <i>Larry W. Lottin</i>      <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)      C. Date of Delivery  LARRY W. LOTTIN</p>														
<p>1. Article Addressed to:</p> <p style="margin-left: 40px;">City Properties LLC  PO Box 6524  Laurel MS 39241</p> <div style="text-align: center;">   9590 9402 7263 1284 6707 23 </div>	<p>D. Is delivery address different from item 1?    <input type="checkbox"/> Yes  If YES, enter delivery address below:            <input type="checkbox"/> No</p> <div style="text-align: center;">  </div> <p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail™</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Registered Mail™ Restricted Delivery</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail™	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Registered Mail™ Restricted Delivery	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®														
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™														
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery														
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™														
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery														
<input type="checkbox"/> Insured Mail™	<input type="checkbox"/> Signature Confirmation Restricted Delivery														
<input type="checkbox"/> Registered Mail™ Restricted Delivery															
<p>2. <span style="border: 1px solid black; padding: 2px;">7022 0410 0002 9813 2500</span></p>	<p><input type="checkbox"/> Registered Mail™ Restricted Delivery (over \$500)</p>														

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

LOC Properties LLC  
PO Box 9  
Denham Springs LA 70727



9590 9402 7263 1284 6700 13

2. Article Number (Transfer from service label)

7022 0410 0002 9813 3156

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

Agent

Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  Yes

If YES, enter delivery address below:  No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

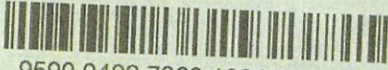
stricted Delivery

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

RAPAD ~~Box~~ Oilfield  
 1309 Hillcrest Drive  
 Laurel MS 39440



9590 9402 7263 1284 6772 10

2. Article Number (Transfer from service label)

7022 0410 0002 9813 3149

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*Marian Sims*

Agent

Addressee

B. Received by (Printed Name)

MARIAN SIMS

C. Date of Delivery

D. Is delivery address different from item 1?

Yes

If YES, enter delivery address below:

No

3. Service Type

Adult Signature

Adult Signature Restricted Delivery

Certified Mail®

Certified Mail Restricted Delivery

Collect on Delivery

Collect on Delivery Restricted Delivery

Insured Mail

Priority Mail Express®

Registered Mail™

Registered Mail Restricted Delivery

Signature Confirmation™

Signature Confirmation Restricted Delivery

Domestic Return Receipt

**From:** [PERRY PHILLIPS](#)  
**To:** [Tyler Berry](#)  
**Cc:** [Walter Huff](#); [RICK YARBOROUGH](#)  
**Subject:** Re: [EXTERNAL SENDER]RE: [EXTERNAL SENDER]Property in Laurel MS  
**Date:** Wednesday, June 15, 2022 3:44:41 PM

---

I can confirm receipt of your email below.

Perry Phillips  
800 US Highway 98  
Columbia, MS 39429

601-424-3205 Direct  
601-270-1234 Mobile

---

**From:** Tyler Berry <tyler.berry@neel-schaffer.com>  
**Sent:** Wednesday, June 15, 2022 3:40 PM  
**To:** PERRY PHILLIPS <Perry.Phillips@stmtires.com>  
**Cc:** Walter Huff <walter.huff@neel-schaffer.com>  
**Subject:** [EXTERNAL SENDER]RE: [EXTERNAL SENDER]Property in Laurel MS

**Caution:** This email originated from an outside e-mail address.

Let's try the easiest thing first to avoid USPS mail.

**Mr. Phillips, can you confirm you have received the attached Contiguous Landowner Notification of Corrective Action and Subsequent Discharge of Treated Groundwater Due to Leaking Underground Storage Tanks?**

I'll let you know if this method is acceptable to MDEQ.

RTB

---

**From:** PERRY PHILLIPS <Perry.Phillips@stmtires.com>  
**Sent:** Wednesday, June 15, 2022 3:32 PM  
**To:** Tyler Berry <tyler.berry@neel-schaffer.com>  
**Cc:** Walter Huff <walter.huff@neel-schaffer.com>  
**Subject:** Re: [EXTERNAL SENDER]Property in Laurel MS

Tyler

You can send the notice to me at the address below. I am in the Manager of Real Property Reserve, LLC

Perry Phillips  
800 US Highway 98  
Columbia, MS 39429

601-424-3205 Direct  
601-270-1234 Mobile

---

**From:** Tyler Berry <[tyler.berry@neel-schaffer.com](mailto:tyler.berry@neel-schaffer.com)>  
**Sent:** Wednesday, June 15, 2022 2:43 PM  
**To:** PERRY PHILLIPS <[Perry.Phillips@stmtires.com](mailto:Perry.Phillips@stmtires.com)>  
**Cc:** Walter Huff <[walter.huff@neel-schaffer.com](mailto:walter.huff@neel-schaffer.com)>  
**Subject:** [EXTERNAL SENDER]Property in Laurel MS

**Caution:** This email originated from an outside e-mail address.

Mr. Phillips,

I'm trying to reach the owner of the property in Laurel, MS owned by Real Property Reserve LLC (Parcel IDs below). Neel-Schaffer Inc. is preparing to install a remediation system at the RAPAD Express 112 service station (adjacent property), which MDEQ requires us to notify contiguous landowner as part of the water discharge permit application. Back in May, I mailed out the attached landowner notification form to the address listed on the property records. I have not received a response. Can you help MDEQ and Neel-Schaffer get in touch with a representative of the property owner?

Parcel ID: 119M-12-00-002.0E  
Address: 2501 AIRPORT Dr  
Zip Code: 39440  
Owner: REAL PROPERTY RESERVE LLC

Parcel ID: 119M-12-00-002.00  
Address: 2501 AIRPORT Dr  
Zip Code: 39440  
Owner: REAL PROPERTY RESERVE LLC

Please do not hesitate to call my cell if you have questions.

Tyler

---

**R. Tyler Berry, RPG, CPESC**  
*Senior Geologist*



**Neel-Schaffer, Inc**  
772 Howard Avenue  
Biloxi, MS 39530-3820  
Phone: 228.374.1211  
Mobile: 601.941.9305

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

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

## **LABORATORY RESULTS**



## EDL Labs, Inc.

April 28, 2022

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

TEL:

FAX:

RE: Rapad Expresss 112

Order No.: 2204154

Dear Tyler Berry:

This is your final report for Workorder No. 2204154 and takes precedence over any previous preliminary report.

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

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

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

Jonathan Stephens  
Operations Manager



# EDL Labs, Inc.

## Report of Analytical Results

**Client:** Neel-Schaffer **PO No:** 13849.000.009  
**Lab ID:** 2204154-001 **WO No:** 2204154  
**Project:** Rapad Expresss 112 **Project No:** 13849.000.009  
**Client Sample ID:** MW-1 **Facility ID No:** 11343  
**Collection Date:** 04/22/22 7:23 **Date Received:** 04/22/22 12:50  
**Sampled By:** **Matrix:** AQUEOUS

Parameter	Result	Limits	Qual	RL	DF	Units	Analysis Date/Time	Method	Analyst
<b>METALS</b>									
Iron	13.8			0.180	20	mg/l	4/27/2022 16:11	200.7	JGB
Hardness (As CaCO3)	220			0.100	1	mg/l	4/28/2022 10:59	130.2	JGB

**Qualifiers:** \* Value exceeds permit limit. A Recoveries affected by interferences/high background  
BDL Below Detection Limit C Value is below Minimum Compound Limit.  
E Value above quantitation range F Sample dilution caused poor/no surrogate recovery.  
H Holding times for preparation or analysis exceeded PQL Practical Quantitation Limit  
R RPD outside accepted recovery limits S Spike Recovery outside accepted recovery limits



EDL Labs, Inc. 39 David Swan Lane • Purvis, MS 39475

CHAIN OF CUSTODY RECORD

Quote: \_\_\_\_\_ Page 1 of 1

Company Name: Neal Schaffer Phone: \_\_\_\_\_  
 Attn: Tylen Barry Fax #: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 email: \_\_\_\_\_  
 Project Name: Ropad Express 112 Proj #: 13849.000.009  
 P.O.#: \_\_\_\_\_ Facility ID: 11343  
 Sampler Signature: E. Horden

LAB ANALYSIS										
Cont. Codes	P									
pH	/									
Pres Codes	B, I									
Parameters	Iron	Hardness								

Container Type Codes		
AV Amber Vial	P Plastic	
AG Amber Glass	ES Enviro Sampler	
CG Clear Glass	CV Clear Vial	
Other _____		
Matrix Codes*		
SD Solid Waste	GL Ice	
GW Ground Water	SL Sludge	
A/W Analyte Free H <sub>2</sub> O	SO Soil Sediment	
WW Waste Water	AQ Aqueous	
DW Drinking Water	NA Nonaqueous	
M Misc Liquid	O Other (Please specify)	
Pres/Codes		
A None	E HCL	I Ice
B HNO <sub>3</sub>	F NaOH	J Zn Acetate
C H <sub>2</sub> SO <sub>4</sub>	G Na <sub>2</sub> SO <sub>3</sub>	K Other
D NaOH	H NaHSO <sub>4</sub>	

#	Sample Label (Client ID)	Collect Date	Collect Time	Matrix Code*	Integrity OK (Y/N)	Total # of Containers	Parameters
1	MW-1	4/22/22	07:23	W	Y	2	Iron, Hardness
2							
3							
4							
5							
6							
7							
8							
9							
0							

LAB USE ONLY

T.A.T. REQUEST		Short Hold		COC OK		Date Cooler Opened		Initials	
Standard	RUSH			Y <input checked="" type="checkbox"/> N <input type="checkbox"/>		4-22-22		TAA	
Y/N	Date Required	Y	N						
Relinquished by		Date	Time	Received by		Date	Time		
E. Horden		4-22-22	12:50	TAA		4-22-22	12:50		

Lab Use Only			
	Yes	No	NA
Sample INTACT upon arrival?	X		
Refrigerated on Wet Ice? Temp: <u>2.5</u> °C	X		
Proper Preservation Indicated?	X		
Bottle Labels Filled In?	X		
Refrigerated within holding time?	X		
Custody seals intact?			X
Volatile rec'd without headspace?			X
Proper Containers Used?	X		
Trip Blank received?			X

**PROPOSED WATER TREATMENT CHEMICAL**

**From:** [Analytix](#)  
**To:** [Tyler Berry](#)  
**Subject:** Re: RAPAD Express 112 Remediation System Chemical  
**Date:** Friday, June 17, 2022 4:47:09 PM  
**Attachments:** [Rpt\\_2204154\\_Final\\_v1.pdf](#)

---

Hi Tyler.

Iron above 1-2 ppm becomes an issue in remediation applications. At 13 ppm iron, I suggest using the same AN-330GH product at 75 ppm as product. To treat 20 gpm @ 75 ppm, the daily product demand will be about 2 gallons per day or roughly one 55 gal drum per month

Thank you

Boz

Sent from my iPhone

On Jun 17, 2022, at 1:49 PM, Tyler Berry <[tyler.berry@neel-schaffer.com](mailto:tyler.berry@neel-schaffer.com)> wrote:

Boz,

I also have another site with a DPE system that may need chemical. Please see attached analytical results.

Do you think the iron and hardness will be an issue? Similar system design as the other we discussed on the phone.

.....  
**R. Tyler Berry, RPG, CPESC**  
*Senior Geologist*

**Neel-Schaffer, Inc**  
772 Howard Avenue  
Biloxi, MS 39530-3820  
Phone: 228.374.1211  
Mobile: 601.941.9305

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

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**1. CHEMICAL IDENTIFICATION**

Product Name ..... AN-330GH  
 Recommended Use ..... Antiscalent, Descaler, Iron Control  
 Restrictions on Use ..... Not Determined  
 Emergency Number ..... Infotrac 1-800-535-5053  
 Customer Service Hotline ..... 281-286-7562 (8 AM to 5 PM CST)

Supplier of SDS:

Analytix Technologies LLC  
 PO Box 590466  
 Houston TX 77259-0466  
 Tel: (281) 286-7562  
 Web: [www.analytixtechnoloies.com](http://www.analytixtechnoloies.com)  
 Email: [analytix@earthlink.net](mailto:analytix@earthlink.net)

**2. HAZARD IDENTIFICATION**

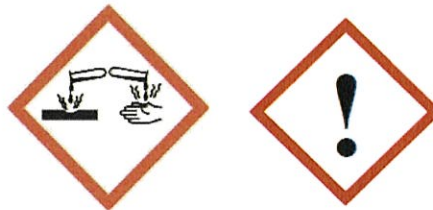
**GHS Hazard Classification:**

- Skin Corrosion Category 1A
- Serious eye damage/irritation Category 1
- Acute Toxicity - Inhalation Category 4
- -Ingestion Category 4

**GHS Label Elements:**

Potential Health Effects – Direct eye contact can cause eye damage. The product is irritating to skin, and irritating to respiratory and gastrointestinal membranes.

**Hazard Pictograms:**



**Signal Word: Danger**

**Hazard Statement:**

- H314 Causes severe skin burns and eye damage.
- H318 Causes serious eye damage.
- H302 Harmful if swallowed
- H332 Harmful if inhaled

**Prevention:**

- P260 Do not inhale dusts/fume/gas/mist/vapors/spray.
- P264 Wash thoroughly after handling.
- P280 Wear protective gloves / eye and face protection.

**Response:**

- P301+P330+P331 IF SWALLOWED: Rinse mouth. Drink plenty of water. DO NOT induce vomiting.
- P302+352 IF ON SKIN: Wash with plenty of soap and water.
- P305+351+338 IF IN EYES: Rinse continuously with water for several minutes. Remove contact lenses if present and easy to do - continue rinsing.
- P310 Immediately call a POISON CENTER or doctor / physician.
- P321 Specific treatment (see information on the label).
- P362 Take off contaminated clothing and wash before reuse.

**Disposal:** Dispose of contents / container in accordance with local / regional / national / international regulations.

**Other hazards:** No applicable data available.



**3. COMPOSITION / INFORMATION ON INGREDIENTS**

Mixture of water treatment chemicals

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

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

**4. FIRST AID MEASURES**

Eyes.....Immediately flush with water for at least 15 minutes, lifting the upper and lower eyelids intermittently.  
.....See a medical doctor or ophthalmologist immediately.

Skin.....Immediate first aid is not likely to be required. Wash with plenty of soap and water. Get medical attention  
..... if irritation occurs and persists.

Ingestion.....Rinse mouth with water. Dilute by drinking plenty of water. Do not induce vomiting. Never give  
..... anything by mouth to an unconscious person. A physician can be contacted for advice.

Inhalation.....Immediate first aid is not likely to be required. Move to fresh air. If breathing difficulty or discomfort  
.....occurs and persists, contact a medical doctor.

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

**5. FIRE FIGHTING MEASURES**

SUITABLE EXTINGUISHING MEDIA: alcohol resistant foam, CO<sub>2</sub>, powder, water spray

UNSUITABLE EXTINGUISHING MEDIA: Water jet

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

HAZARDOUS DECOMPOSITION: CO, CO<sub>2</sub>

ERG Guide No. 153

**6. ACCIDENTAL RELEASE MEASURES**

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

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

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

**7. HANDLING AND STORAGE**

Handling – Avoid contact with eyes, skin and clothing. Avoid breathing vapor or mist and use approved splash goggles and vapor respirator fitted with approved organic cartridge if vaporization or misting occurs. Use with adequate ventilation.

Storage: Store away from heat and alkaline materials. Do not store in mild steel, carbon steel or Aluminum. Suitable materials are: PVC; polypropylene; polyethylene and glass-reinforced plastics. Keep containers tightly closed when not in use and when in transit.

**8. EXPOSURE CONTROLS/PERSONAL PROTECTION EQUIPMENT**

**Control Parameters:**

<u>Active Ingredients</u>	<u>CAS #</u>	<u>Source</u>		
		<u>OSHA</u>	<u>ACGIH</u>	<u>NIOSH</u>
Sodium Polycarboxylate – (acrylic copolymer)	Non-Hazardous	NE	NE	NE
1-Hydroxyethylidene-1,1-diphosphonic acid	2809-21-4	NE	NE	NE
Hydroxyacetic Acid – (Glycolic Acid)	79-14-1	NE	NE	NE
NE: No Limit Established				

**Exposure Controls:**

**Eye Protection:** Wear Face Shield and splash proof goggles meeting ANSI Z87.1 or approved equivalent.

**Hand & Body Protection:** Minimize skin contact by wearing protective PVC, Neoprene, Chloroprene gloves. overalls or apron is also recommended.

**Respiratory Protection:** None required under normal handling and transfer conditions. An approved respiratory protection program meeting OSHA 1910.134 and ANSI Z88.2 requirements or equivalent must be followed whenever workplace conditions warrant use of a respirator. Where vapors or mist may occur, wear a properly fitted NIOSH-approved or equivalent half-mask, air-purifying respirator fitted with NIOSH-approved organic vapor cartridges.

**Engineering Controls:** Facilities storing or utilizing this material should be equipped adequate ventilation, eyewash and shower facility.

**9. PHYSICAL AND CHEMICAL PROPERTIES**

Appearance: .....	Clear Colorless to Light Straw Liquid
Upper/Lower Flammability Or Explosive Limits: .....	Not Determined
Odor: .....	Mild
Vapor Pressure: .....	17.5 Mm Hg @ 20 <sup>o</sup> c
Odor Threshold: .....	Not Determined
Vapor Density: .....	Not Determined
pH (1% solution): .....	< 2.0
Specific Gravity: .....	1.10 +/- .05
Melting Point/Freezing Point: .....	< 0 <sup>o</sup> C
Solubility (in water): .....	Completely Soluble
Initial Boiling Point and Boiling Range: .....	101 <sup>o</sup> C to 105 <sup>o</sup> C
Flash Point: .....	Not Determined
Evaporation Rate: .....	Not Determined
Flammability: .....	Not Determined
Partition Coefficient: N-Octanol/Water: .....	Not Determined
Auto-Ignition Temperature: .....	Not Determined
Decomposition Temperature: .....	Not Determined
Viscosity: .....	Not Determined

Note: The above physical data are typical values. They should not be construed as specification for the product.

**10. STABILITY AND REACTIVITY**

REACTIVITY May react with strong bases and oxidizing agents  
STABILITY: Stable under normal conditions  
CONDITIONS TO AVOID: contact with strong bases, strong oxidizers  
INCOMPATIBILITY: No further relevant information available  
HAZARDOUS DECOMPOSITION: CO, CO2  
HAZARDOUS POLYMERIZATION: Will not occur.

**11. TOXICOLOGICAL INFORMATION**

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

**Hydroxyacetic Acid – (glycolic acid)**

Inhalation 4 h LC50: 3.6 mg/l, Rat (as dust, 100% solid)  
 Dermal Acute toxicity estimate: > 5,000 mg/kg , human  
 Oral LD50: 2,040 mg/kg , Rat  
 Skin irritation: Causes burns. Rabbit

**1-Hydroxyethylidene-1,1-diphosphonic acid:**

Eye Irritation.....Irritant (rabbit)	Dermal LD <sub>50</sub> .....> 7940 mg/kg (rabbit)
Skin Irritation.....Irritant (rabbit)	Oral LD <sub>50</sub> .....> 2350 mg/kg (rat)

**Sodium Polycarboxylate – (acrylic copolymer):**

Eye Irritation.....Slight Irritant (rabbit)	Dermal LD <sub>50</sub> .....> 5000 mg/kg (rabbit)
Skin Irritation.....Non-irritant (rabbit)	Oral LD <sub>50</sub> .....> 5000 mg/kg (rat)

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

**12. ECOLOGICAL INFORMATION**

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

**Sodium Polycarboxylate:**

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

**Hydroxyacetic Acid – (glycolic acid):**

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

Readily Biodegradable per OECD Test

**12. ECOLOGICAL INFORMATION (continued)**

**1-Hydroxyethylidene-1,1-diphosphonic:**

Algae	(Selenastrum Capricornutum), 96 Hour EC50: .....	3.0	mg/l
	NOEC:.....	1.3	mg/l
Fish	Bluegill Sunfish (Lepomis macrochirus), 96 Hour LC50 .....	> 800	mg/l
	NOEC:.....	529	mg/l
	Rainbow Trout (Salmo gairdneri), 96 Hour LC50:.....	> 350	mg/l
	NOEC:..... Sheephead Minnow, 96 Hour	151	mg/l
	LC50:.....	> 2100	mg/l
	NOEC:.....	104	mg/l
	Channel Catfish, 96 Hour, 96 Hour LC50.....	> 650	mg/l
	NOEC:.....	529	mg/l
Invertebrates	Daphnia magna, 48 Hour EC50: .....	> 500	mg/l
	NOEC:.....	400	mg/l
	Grass Shrimp (Palaemonetes Pugio), 96 Hour EC50:.....	> 1700	mg/l
	NOEC:.....	104	mg/l

This component has low avian toxicity, is slightly toxic to oysters and is practically non-toxic to fish and invertebrates. Algal growth inhibition is due to ability of the product to complex materials and not to toxicity per se.

**13. DISPOSAL CONSIDERATION**

**Disposal Method:** For small quantities neutralize with lime or soda ash and flush away with plenty of water. For large spillage absorb spillage onto sand or other absorbent material and dispose of as solid waste as per local regulations (e.g. incineration). Surplus product can be incinerated.

If the product was supplied in a single use container, care should be taken to dispose of the container in a responsible manner and in accordance with applicable regulations. Label precautions should be followed for any residual material in the container. Whenever possible, our company encourages recycling of containers.

**14. TRANSPORT INFORMATION**

- U.S. DOT (Department of Transportation)
- Proper Shipping Name – Corrosive liquid, acidic, organic, N.O.S. (contains Glycolic Acid)
- Primary hazard Class/Division - 8 (Corrosive)
- UN/NA Number – UN 3265
- Packing Group – III
- Placards – Corrosive
- Label – Corrosive
- ERG Guide # 153



Other Shipping Information – DOT Marking – Not applicable  
 Hazardous Substance/RQ – Not applicable  
 49 STCC Number – Not applicable  
 Keep container tightly closed. Protect against physical damage.

**15. REGULATORY INFORMATION**

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

UNITED STATES

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

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

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

**16. OTHER INFORMATION**

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

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

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

Date Prepared: 5-20-2015

Date Revised: 12-15-2015

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RECEIVED  
JUN 24 2022  
Dept. of Environmental Quality

June 22, 2022  
N-S Project No. 15902.000.004

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

REFERENCE: DISCHARGE PERMIT APPLICATION  
RAPAD EXPRESS #112  
1251 HILLCREST DRIVE  
LAUREL, MISSISSIPPI  
MGPTF FACILITY I.D. NO. 11343

Dear Mr. Messemore:

Submitted herewith is the General Discharge Permit Application and supporting documents for discharges related to the RAPAD Express #112 facility located at 1251 Hillcrest Drive, Laurel, Mississippi. A copy of this permit application has been submitted to Ms. Heather Pitts, Project Manager, in the Underground Storage Tank Branch. Should you have questions or require additional information, please contact us at (601) 948-3071.

A groundwater sample was collected from monitor well MW-1 and analyzed for hardness and iron. The laboratory analyses were performed to determine whether scaling of calcium carbonate or iron may present a concern within the components of the remediation system and the system effluent line. The groundwater hardness concentration was reported as 220 milligrams per liter (mg/L). Iron scaling buildup can occur as groundwater is aerated through groundwater remediation activities. The groundwater iron concentration for monitor well MW-1 was reported as 13.8 mg/L. Consequently, we anticipate significant scaling buildup within the system and the system effluent line and propose utilizing an anti-scaling chemical in the water treatment process. The laboratory analytical report and proposed anti-scaling chemical supporting documents are attached.







Sincerely,  
**NEEL-SCHAFFER, INC.**



R. Tyler Berry, RPG  
Senior Geologist



Cc: Ms. Heather Pitts., MDEQ, UST Branch

Enclosures



