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 [Redacted]
(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)
THE APPLICANT IS  □ OWNER  □ OPERATOR (please check one or both)

**OWNER INFORMATION**

<table>
<thead>
<tr>
<th>Owner Contact Name:</th>
<th>Sarah Saucier</th>
<th>Position:</th>
<th>Authorized Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owner Company Name:</td>
<td>Laurel Oil LLC</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Owner Street (P.O. Box):</td>
<td>Post Office Box 3060</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Owner City:</td>
<td>Laurel, Mississippi</td>
<td>State:</td>
<td>MS</td>
</tr>
<tr>
<td>Owner Phone Number (include area code):</td>
<td>(601) 649-3261</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**OPERATOR INFORMATION (if different than owner)**

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

**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  |  |                  |

April 29, 2008
Page 2 of 3
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.

B. Gregory Taylor

Signature¹ (Must be signed by operator when different than owner)  Date Signed

B. Gregory Taylor  6/21/22

Senior Project Manager

Printed Name¹

Title

¹This 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.

USTRNOI 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

April 29, 2008
Page 3 of 3
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) 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 Hillerest 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.

Michael Votta
POTW (or Authority) Authorized Signature

5/26/2022
Date Signed

Michael Votta
Printed Name

Wastewater Supervisor
Title

(601) 650-0027
Daytime Telephone

March 2006
Page 1 of 1

Page 5
FIGURES
CONTIGUOUS LANDOWNER NOTIFICATION
<table>
<thead>
<tr>
<th>SENDER: COMPLETE THIS SECTION</th>
<th>COMPLETE THIS SECTION ON DELIVERY</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Complete items 1, 2, and 3.</td>
<td>A. Signature</td>
</tr>
<tr>
<td>● Print your name and address on the reverse so that we can return the card to you.</td>
<td>□ Agent</td>
</tr>
<tr>
<td>● Attach this card to the back of the mailpiece, or on the front if space permits.</td>
<td>□ Address.</td>
</tr>
<tr>
<td>1. Article Addressed to:</td>
<td>B. Received by (Printed Name)</td>
</tr>
<tr>
<td>City of Laurel Airport Authority</td>
<td></td>
</tr>
<tr>
<td>PO Box 2335</td>
<td>Matt Owen</td>
</tr>
<tr>
<td>Laurel MS 39440</td>
<td>9-25-22</td>
</tr>
<tr>
<td>42</td>
<td>D. Is delivery address different from item 1?</td>
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<tr>
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<tr>
<td></td>
<td>If YES, enter delivery address below:</td>
</tr>
<tr>
<td></td>
<td>□ No</td>
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<table>
<thead>
<tr>
<th>2. Article Number/Transfer From account number:</th>
<th>7022 0410 0002 8813 3163</th>
</tr>
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<tbody>
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<tr>
<td>□ Adult Signature</td>
<td>Registered Mail™</td>
</tr>
<tr>
<td>□ Adult Signature Restricted Delivery</td>
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</tr>
<tr>
<td>□ Certified Mail®</td>
<td>Signature Confirmation™</td>
</tr>
<tr>
<td>□ Certified Mail Restricted Delivery</td>
<td>Restricted Delivery</td>
</tr>
<tr>
<td>□ Collect on Delivery</td>
<td></td>
</tr>
<tr>
<td>□ Priority Mail</td>
<td></td>
</tr>
<tr>
<td>□ Priority Mail Restricted Delivery</td>
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</tr>
<tr>
<td>□ Registered Mail™</td>
<td></td>
</tr>
<tr>
<td>□ Registered Mail Restricted Delivery</td>
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</tr>
<tr>
<td>□ Signature Confirmation™</td>
<td></td>
</tr>
<tr>
<td>□ Signature Confirmation Restricted Delivery</td>
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</tr>
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PS Form 3811, July 2020 PSN 7530-02-000-0053 Domestic Return Receipt
<table>
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</thead>
<tbody>
<tr>
<td>□ Complete items 1, 2, and 3.</td>
</tr>
<tr>
<td>□ Print your name and address on the reverse</td>
</tr>
<tr>
<td>so that we can return the card to you.</td>
</tr>
<tr>
<td>□ Attach this card to the back of the mailpiece,</td>
</tr>
<tr>
<td>or on the front if space permits.</td>
</tr>
</tbody>
</table>

1. Article Addressed to:  
   LOC Properties LLC  
   PO Box 9  
   Denham Springs, LA 70727

2. Article Number (scanned from service label)  
   7022 0410 0002 9813 3156

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>A. Signature X [Signature]</td>
</tr>
<tr>
<td>□ Agent</td>
</tr>
<tr>
<td>□ Address</td>
</tr>
<tr>
<td>B. If received by printed name:</td>
</tr>
<tr>
<td>C. Date of Delivery</td>
</tr>
</tbody>
</table>
| D. Is delivery address different from item 1?  
   □ Yes  
   □ 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  
   □ Insured Mail Restricted Delivery  
   □ Priority Mail Express®  
   □ Registered Mail™  
   □ Registered Mail Restricted Delivery  
   □ 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:
   - **RAPAD Oilfield**
   - **1309 Hillcrest Drive**
   - **Laurel MS 39440**

2. Article Number (Transfer from service label):
   - **7022 0420 0002 9813 3149**

**Complete This Section On Delivery**

<table>
<thead>
<tr>
<th>A. Signature</th>
<th>B. Received by (Printed Name)</th>
<th>C. Date of Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>X [Signature]</td>
<td>Marcan Sims</td>
<td></td>
</tr>
</tbody>
</table>

D. Is delivery address different from item 1?
- Yes
- 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
- [ ] Insured Mail Restricted Delivery
- [ ] Priority Mail Express®
- [ ] Registered Mail™
- [ ] Registered Mail Restricted Delivery
- [ ] Signature Confirmation™
- [ ] Signature Confirmation Restricted Delivery

*PS Form 3811, July 2020 PSN 7580-02-900-9003*
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

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

Tyler

You can send the notice to me at the address below. I am in the Manager of Real Property Reserve, LLC.
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
Neel-Schaffer, Inc.
772 Howard Avenue
Biloxi, MS 39530-3820
Phone: 228.374.1211
Mobile: 601.941.9305

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LABORATORY RESULTS
April 28, 2022

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

TEL:
FAX:

RE: Rapad Express 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
### Report of Analytical Results

**Client:** Neel-Schaffer  
**Lab ID:** 2204154-001  
**Project:** Rapad Express 112  
**Client Sample ID:** MW-1  
**Collection Date:** 04/22/22 7:23  
**Sampled By:**  

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

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

**Name:** E. Hardon

**Sample Label (Client ID):** M.W-1

<table>
<thead>
<tr>
<th>No.</th>
<th>Sample Label (Client ID)</th>
<th>COLLECT Date</th>
<th>COLLECT Time</th>
<th>Matrix Code*</th>
<th>Refract Date Required</th>
<th>Date Required</th>
<th>Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>M.W-1</td>
<td>4-22-22</td>
<td>12:50</td>
<td>Y</td>
<td>4-22-22</td>
<td>12:50</td>
<td>E. Hardon</td>
</tr>
</tbody>
</table>

**LAB ANALYSIS**

<table>
<thead>
<tr>
<th>Parameters</th>
<th>Iron</th>
<th>Hardness</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>V</td>
</tr>
</tbody>
</table>

**LAB USE ONLY**

- **Container Type Codes**
  - P: Plastic
  - G: Glass
  - C: Ceramic
  - O: Other

- **Matrix Codes**
  - SW: Surface Water
  - MW: Mixed Water
  - DW: Groundwater
  - B: Borehole
  - SW: Surface Water
  - DW: Drilled Water
  - SW: Groundwater
  - B: Borehole

**Sample Information**

- **Project Name:** Rapad Express 112
- **Project ID:** 1384.9.000.007
- **Tech:** E. Hardon

**Notes:**
- Initials: AA
- Date: 4-22-22
- Time: 12:50
- Received by: 4-22-22, 12:50
- Refract Date: 4-22-22
- Initials: AA

**Contact Information:**
- www.edllabs.com
- Telephone: 601-794-2300
- Fax: 601-794-2500
- e-mail: info@edllabs.com

**Percentage:**

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
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</thead>
<tbody>
<tr>
<td>Iron</td>
<td></td>
</tr>
<tr>
<td>Hardness</td>
<td>V</td>
</tr>
</tbody>
</table>

**Additional Information:**
- Sample description:
- Used for:...
- Received on:...
- Refract date:
- Initials: AA
- Sample sent to:
- Storage location:
- Sample comments:

**Note:** This form is for laboratory use only.
PROPOSED WATER TREATMENT CHEMICAL
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> 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: 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.
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.analytixtechnologies.com
Email: 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

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

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, CO2, powder, water spray

UNSUITABLE EXTINGUISHING MEDIA: Water jet

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

HAZARDOUS DECOMPOSITION: CO, CO2

ERG Guide No. 153

6. ACCIDENTAL RELEASE MEASURES

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:

<table>
<thead>
<tr>
<th>Active Ingredients</th>
<th>CAS #</th>
<th>OSHA</th>
<th>ACGIH</th>
<th>NIOSH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sodium Polycarboxylate – (acrylic copolymer)</td>
<td>Non-Hazardous</td>
<td>NE</td>
<td>NE</td>
<td>NE</td>
</tr>
<tr>
<td>1-Hydroxyethylidene-1,1-diphosphonic acid</td>
<td>2809-21-4</td>
<td>NE</td>
<td>NE</td>
<td>NE</td>
</tr>
<tr>
<td>Hydroxyacetic Acid – (Glyeolic Acid)</td>
<td>79-14-1</td>
<td>NE</td>
<td>NE</td>
<td>NE</td>
</tr>
<tr>
<td>NE: No Limit Established</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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°C
Odor Threshold: Not Determined
Vapor Density: Not Determined
pH (1% solution): < 2.0
Specific Gravity: 1.10 +/-.05
Melting Point/Freezing Point: < 0°C
Solubility (in water): Completely Soluble
Initial Boiling Point and Boiling Range: 101 °C to 105 °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 – (glyeolic 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)
- Skin Irritation...........Irritant (rabbit)
- Dermal LD50..............> 7940 mg/kg (rabbit)
- Oral LD50 ..............> 2350 mg/kg (rat)

**Sodium Polycarboxylate – (acrylic copolymer)**
- Eye Irritation...........Slight Irritant (rabbit)
- Skin Irritation...........Non-irritant (rabbit)
- Dermal LD50..............> 5000 mg/kg (rabbit)
- Oral LD50 ..............> 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 – (glyeolic 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:

<table>
<thead>
<tr>
<th></th>
<th>(Selenastrum Capricornutum), 96 Hour EC50:</th>
<th>3.0 mg/l</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NOEC:........................................</td>
<td></td>
</tr>
<tr>
<td>Fish</td>
<td>Bluegill Sunfish (Lepomis macrochirus), 96 Hour LC50</td>
<td>&gt; 800 mg/l</td>
</tr>
<tr>
<td></td>
<td>NOEC:........................................</td>
<td>529 mg/l</td>
</tr>
<tr>
<td></td>
<td>Rainbow Trout (Salmo gairdneri), 96 Hour LC50</td>
<td>&gt; 350 mg/l</td>
</tr>
<tr>
<td></td>
<td>NOEC:........................................</td>
<td>151 mg/l</td>
</tr>
<tr>
<td></td>
<td>Sheephead Minnow, 96 Hour LC50..............</td>
<td>&gt; 2100 mg/l</td>
</tr>
<tr>
<td>Invertebrates</td>
<td>NOEC:........................................</td>
<td>104 mg/l</td>
</tr>
<tr>
<td></td>
<td>Channel Catfish, 96 Hour, 96 Hour LC50.....</td>
<td>&gt; 650 mg/l</td>
</tr>
<tr>
<td></td>
<td>NOEC:........................................</td>
<td>529 mg/l</td>
</tr>
<tr>
<td></td>
<td>Daphnia magna, 48 Hour EC50:................</td>
<td>&gt; 500 mg/l</td>
</tr>
<tr>
<td></td>
<td>NOEC:........................................</td>
<td>400 mg/l</td>
</tr>
<tr>
<td></td>
<td>Grass Shrimp (Palaeomonetes Pugio), 96 Hour EC50:</td>
<td>&gt; 1700 mg/l</td>
</tr>
<tr>
<td></td>
<td>NOEC:........................................</td>
<td>104 mg/l</td>
</tr>
</tbody>
</table>

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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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.

[Signature]

R. Tyler Berry, RPG
Senior Geologist

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

Enclosures