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

(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)
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 28053 Highway 28 West, Hazlehurst, Copiah Co,
Mississippi 39083 (Phillips 66 Food Plaza) [complete address with county].
Approximately 0.003 to 0.02 [proposed volume in MGD] of treated groundwater will be
discharged to City of Hazlehurst [name of local POTW or
Authority]. The treated groundwater will be discharged in accordance with the conditions, requirements
and limitations of Mississippi’s Underground Storage 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.

[Signature]
POTW (or Authority) Authorized Signature 6/10/22

[Signature]
Kenneth Earl Ramsey Mayor

[Signature]
Printed Name

[Signature]
Daytime Telephone

March 2006
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CONTIGUOUS LANDOWNER NOTIFICATION OF CORRECTIVE ACTION AND SUBSEQUENT DISCHARGE OF TREATED GROUNDWATER DUE TO LEAKING UNDERGROUND STORAGE TANK(S)
(see Activity 4, S-7 of the USTGP.)

Underground storage tanks located at 28053 Highway 28 West, Hazlehurst, Copiah County Mississippi 39083 (Phillips 66 Food Plaza) [street address with city and county] have been determined to have released motor fuel. In order to protect the environment 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) 348-3071 [phone number] is proposing to begin the cleanup process and discharge treated groundwater to City of Hazlehurst 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
**SENDERS: 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:**
   
   **Cardlock Oil Company Inc.**  
   **P.O. Box 1430**  
   **McComb, MS 39648**

   9590 9402 7263 1284 6772 58

2. **Article Number (transfer from service label):**
   
   7022 0410 0002 9813 4962

---

**COMPLETE THIS SECTION ON DELIVERY**

A. **Signature:**
   
   X

B. **Received by (Printed Name):**
   
   **Khalaf Tawal M**

C. **Date of Delivery:**
   
   07/26/2018

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

3. **Service Type:**
   
   - [ ] Priority Mail Express®
   - [ ] Registered Mail™
   - [ ] Certified Mail®
   - [ ] Collect on Delivery
   - [ ] Restricted Delivery

4. **Article Number (transfer from service label):**
   
   7022 0410 0002 9813 4931

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PS Form 3811, July 2020 PSN 7530-02-003-9053

Domestic Return Receipt
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<th>SENDER: COMPLETE THIS SECTION</th>
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<td>Complete items 1, 2, and 3.</td>
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<tr>
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<td>X</td>
</tr>
<tr>
<td>Attach this card to the back of the mailpiece, or on the front if space permits.</td>
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1. Article Addressed to:

   WH Ljagal LLC  
   PO Box 4568  
   Niscony, CA 90091

2. Article Number:  

   9560 9402 7283 1284 6772 65

   7022 0410 0002 9813 4955  

   Restricted Delivery

3. Service Type:  

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

4. Is delivery address different from item 1?  

   □ Yes  
   □ No  

   If YES, enter delivery address below:

   " Address:  

   City:  

   State:  

   Zip:  

   5. Agent Signature:  

   Signature Date:  

   D: Date of Delivery:  

   6. Domestic Return Receipt:  

   PS Form 3811, July 2020 PSN 7530-02-000-003
April 28, 2022

Tyler Berry
Neel-Schaffer
101 Business Park Drive, Suite A
Ridgeland, MS 38157

TEL: 

FAX: 

RE: Phillips 66

Order No.: 2204153

Dear Tyler Berry:

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

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

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

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

Jonathan Stephens
Operations Manager
## Report of Analytical Results

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<th>Result</th>
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<th>RL</th>
<th>DF</th>
<th>Units</th>
<th>Analysis Date/Time</th>
<th>Method</th>
<th>Analyst</th>
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**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
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<th>Collect Time</th>
<th>Matrix Code</th>
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<th>Inlet Std 2</th>
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</table>

**LAB USE ONLY**

<table>
<thead>
<tr>
<th>Standard</th>
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<tbody>
<tr>
<td>Y/N</td>
<td>O</td>
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Relinquished by: B. Langston 4/22/22 14:03
Hi Tyler;

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

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

Discharge to POTW will not be an issue.

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

Regards

Boz

Sent from Mail for Windows
Neel-Schaffer, Inc. Confidentiality Note:

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

Mixture of water treatment chemicals

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>CAS No.</th>
<th>GHS Classification</th>
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<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.
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

**1-Hydroxyethylidene-1,1-diphosphonic acid:**
- Eye Irritation............Irritant (rabbit)
- Skin Irritation............Irritant (rabbit)

**Sodium Polycarboxylate — (acrylic copolymer):**
- Eye Irritation............Slight Irritant (rabbit)
- Skin Irritation............Non-irritant (rabbit)
- Dermal LD50............> 7940 mg/kg (rabbit)
- Oral LD50............> 2350 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 Polyacrylate:**
- 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: Pseudokircheriella subcapitata, 72-hour EC50 = 44 mg/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
15. REGULATORY INFORMATION

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

UNITED STATES

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

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

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

16. OTHER INFORMATION

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

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

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

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

The information contained herein is to the best of our knowledge and belief, accurate, but any recommendations or suggestions made are without warranty or guarantee of results, expressed or implied. We therefore, assume no liability for loss or damage incurred by following these suggestions. Any determination of fitness for a particular purpose is the buyer’s responsibility. Analytix Technologies urges persons receiving this information to make their own determination as to the information’s suitability and completeness for their particular application. Analytix Technologies’ only obligation will be to replace such quantity of product proved to be defective. User assumes all risks and liability whatsoever in connection with the suitability of the product for the users intended application. Analytix Technologies shall not be responsible in tort, contract or under any theory for any loss or damage, incidental or consequential, arising out of the use of or the inability to use the products.
June 21, 2022
N-S Project No. 15902.000.004

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

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

Dear Mr. Messemore:

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

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