ARCADIS
Infrastructure, environment, facilities

JAN 1 1 2007

ARCADIS U.S., Inc.
10352 Plaza Americana Drive
Baton Rouge
Louisiana 70816
Tel 225 292 1004
Fax 225 218 9677
www.arcadis-us.com

Mr. Jere "Trey" Hess, P.E.
MDEQ – Office of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39289-0385

FILE COPY

225 218 9672 EXT. 245

ENVIRONMENTAL

Subject:
Drum Inventory
Former Vicksburg Chemical Company
Vicksburg, Mississippi

Date:
8 January 2007

Contact:
David R. Escudé

Extension:
245

Email:
descude@arcadis-us.com

Our ref:
LA002656.0001.00004
Mississippi Bluffs/2656.1.4/C/2/egp

Dear Mr. Hess:

On November 21, 27, and 29, 2006, ARCADIS conducted a drum inventory at the former Vicksburg Chemical Company (Vicksburg Chemical) located in Vicksburg, Mississippi (Figure 1). After Vicksburg Chemical filed for bankruptcy on March 8, 2002, drums that were used by the plant during operations were abandoned in place in various areas. The purpose of this drum inventory effort was to catalog the locations and pertinent characteristics of the drums remaining on the site.

During drum inventory activities, containers varying in size from 1 gallon to 55 gallons were inspected for structural integrity, amount of substance contained, and type of substance. Approximately 100 drums located in the Multicote Loading Rack, Drum Storage Area North, Drum Storage Area South, Drum Handling, and miscellaneous areas were evaluated (Figure 2). Other drums were located in miscellaneous areas including the shop laydown yard, behind the laboratory, near the vehicle maintenance shop, near the tall oil tank, near the ammonia tank, and areas west of the plant.

The drums were evaluated using a three-tiered rating system. Drums rated "A" were considered to be in good condition. These drums were evaluated as structurally sound. Drums rated "B" were observed to be in fair condition. Some rust was present on these drums; however, these drums do not pose an imminent threat of leaking. Drums rated "C" were determined to be in poor condition. This rating indicates that these drum were observed to be leaking.

Three drums containing a black oily liquid (most likely castor oil) located in the Multicote Loading Rack area were given a rating of "C". Additionally, these drums were not located within secondary containment. The Multicote Loading Rack area is

within the boundaries of proposed remedial activities. All of the other drums were given "A" or "B" ratings. The results of the drum inventory evaluation are contained in Attachment A. A log containing photographs representative of the observed drum conditions is contained in Attachment B.

It is recommended that the contents of all drums rated "C" be re-containerized and/or disposed of in an environmentally acceptable manner. Once the leaking drums have been emptied, they should be destroyed.

Should you have any questions about the findings presented in this letter, please contact one of the undersigned at (225) 292-1004.

Sincerely,

ARCADIS U.S., Inc.

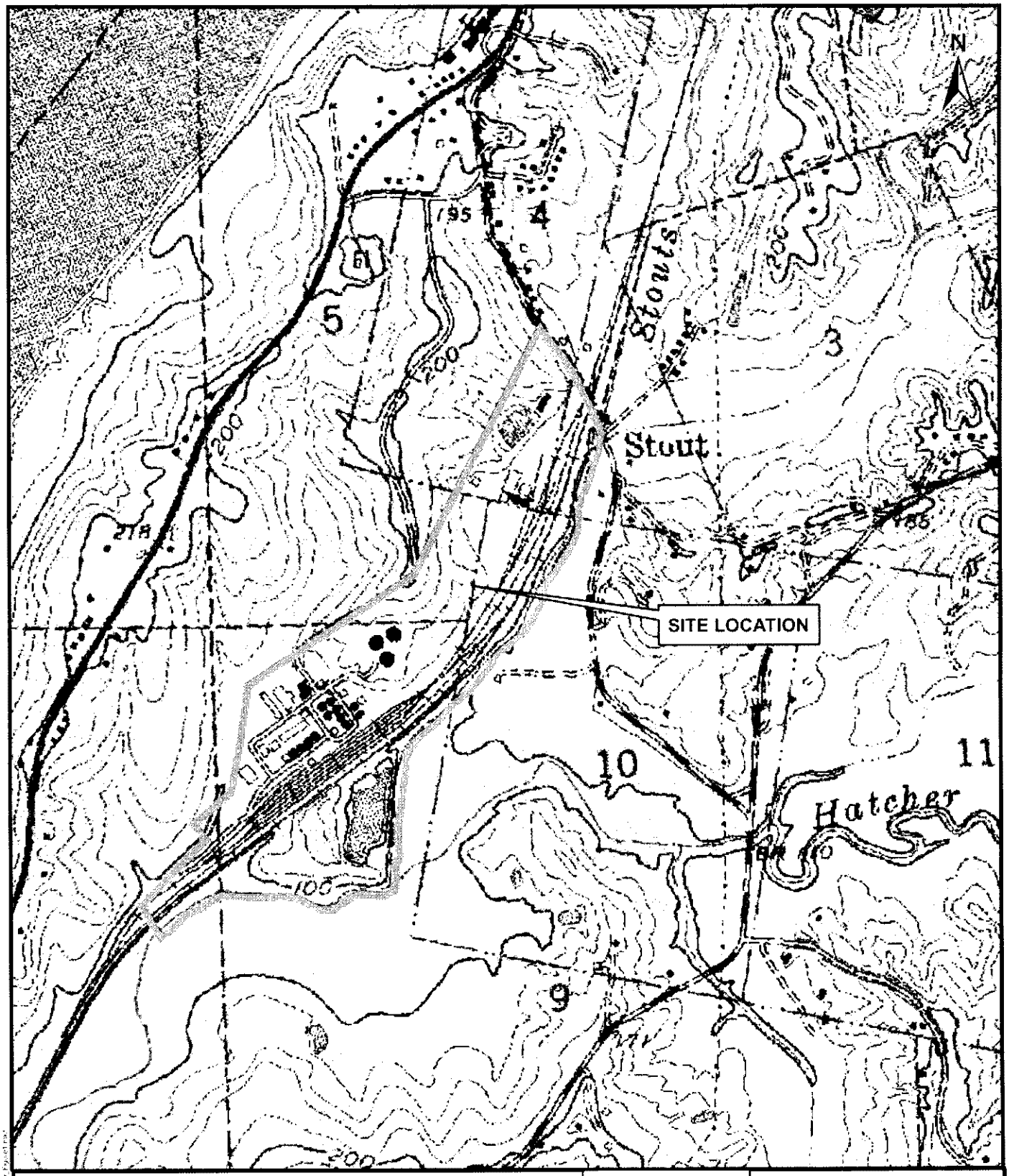
Craig A. Derouen, P.E.
Project Engineer

David R. Escudé, P.E.
Associate Vice President/Principal Engineer

Rudy J. Guichard
Vice President/Area Manager

CAD:DRE:RJG:egp

Attachments



Former Plant Site

Note: Approximate Property Boundary

ARCADIS
10352 Plaza Americana Drive
Baton Rouge, Louisiana 70816
Tel: 225.292.1004 Fax: 225.218.9677

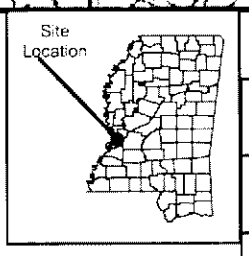
SITE LOCATION MAP

VICKSBURG CHEMICAL COMPANY

VICKSBURG, MISSISSIPPI

REFERENCE:

USGS: Vicksburg West Quadrangle, Mississippi
7.5 Minute Series (Topographic)



500 0 500 1,000 Feet

Project Manager: JE	Completed By: AB
Task Manager: CD	Date: 07/31/2006
Project No.: LA002656.0001	Figure No.: 1

User Name : smen Path\Name : G:\APROJECT\Mississippi Bluffs\LA002656.0001\Figures\2456-01-02--Drum.dwg

DRAWN BY S. MEN	CHECKED CAD		PROJECT NUMBER LA002656.0001
PROJECT MANAGER DRE	DEPARTMENT MANAGER DRE		DRAWING NUMBER 2
DATE 1-5-07	TASK/PHASE NUMBER 0004		

© 2006 ARCADIS G&M, INC.

10352 PLAZA AMERICANA DRIVE
BATON ROUGE, LA 70816
TEL: 225-292-1004
FAX: 225-218-9677
WWW.ARCADIS-US.COM

DRUM LOCATIONS

VICKSBURG CHEMICAL COMPANY SITE

ARCADIS

ATTACHMENT A

Drum Inventory Evaluation

ARCADIS

MISSISSIPPI BLUFFS
VICKSBURG, MISSISSIPPI
DRUM INVENTORY

Project Number: LA002656.0001.00004
Date: 11/27/2006
Coordinate System: GPS

Drum Area Location: Multicote Loading Rack
Personnel: John Trahan

Area	ID #	Latitude	Longitude	Label Present (Y/N)	Secondary Containment (Y/N)	Substance (CAS #, if present)	Condition (A, B or C)	Vol (gal)	Notes
MCLR	1	N 32.29414°	W 90.90675°	N	N	Black Liquid	C		Black liquid, oily castor oil
MCLR	2	N 32.29414°	W 90.90675°	N	N	Black Liquid	C		Black liquid, oily castor oil
MCLR	3	N 32.29414°	W 90.90675°	N	N	Black Liquid	C		Black liquid, oily castor oil
MCLR	A1	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A2	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A3	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A4	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A5	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A6	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A7	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A8	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A9	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A10	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A11	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A12	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)
MCLR	A13	N 32.29414°	W 90.90675°	Y	N	Empty	A	0	Aluminum Drum (Keg)

MCLR Multicote Loading Rack.

Category A - Good (structurally sound)
Category B - Fair (rust present, note degree of rusting)
Category C - Poor (leaking, needs immediate removal)

ARCADIS

MISSISSIPPI BLUFFS
VICKSBURG, MISSISSIPPI
DRUM INVENTORY

Project Number: LA002656.0001.00004
Date: 11/27/2006
Coordinate System: GPS

Drum Area Location: Drum Storage Area North
Personnel: John Trahan

Area	ID #	Latitude	Longitude	Label Present (Y/N)	Secondary Containment (Y/N)	Substance (CAS #, if present)	Condition (A, B or C)	Vol (gal)	Notes
DSAN	1	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	Exxon Zerice N 68 Sealed
DSAN	2	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	Exxon Zerice N 68 Sealed
DSAN	3	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	Exxon Zerice N 68 Sealed
DSAN	4	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	Exxon Zerice N 68 Sealed
DSAN	5	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	Exxon Zerice N 68 Sealed
DSAN	6	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	CPI Eng Solest 220 Sealed
DSAN	7	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	GX 80-90 wt Gear Oil Sealed
DSAN	8	N 32.29761°	W 90.90176°			Empty	B		
DSAN	9	N 32.29761°	W 90.90176°			Empty	B		
DSAN	10	N 32.29761°	W 90.90176°			Empty	B		
DSAN	11	N 32.29761°	W 90.90176°			Empty	B		
DSAN	12	N 32.29761°	W 90.90176°			Empty	B		
DSAN	13	N 32.29761°	W 90.90176°			Empty	B		
DSAN	14	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	Exxon Sparton EP-68 Sealed
DSAN	15	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	Exxon Sparton EP-68 Sealed
DSAN	16	N 32.29761°	W 90.90176°	Y	Y	Oil	B	55	Exxon Sparton EP-68 Sealed

Category A - Good (structurally sound)
Category B - Fair (rust present, note degree of rusting)
Category C - Poor (leaking, needs immediate removal)

ARCADIS

MISSISSIPPI BLUFFS
VICKSBURG, MISSISSIPPI
DRUM INVENTORY

Project Number: LA002656.0001.00004
Date: 11/27/2006
Coordinate System: GPS

Drum Area Location: Drum Storage Area North
Personnel: John Trahan

Area	ID #	Latitude	Longitude	Label Present (Y/N)	Secondary Containment (Y/N)	Substance (CAS #, if present)	Condition (A, B or C)	Vol (gal)	Notes
DSAN	17	N 32.29761°	W 90.90176°	Y	Y	Oil	B	0	Used Oil
DSAN	18	N 32.29761°	W 90.90176°	Y	Y	Oil	B	0	Used Oil
DSAN	19	N 32.29761°	W 90.90176°	Y	Y	Oil	B	5	Used Oil
DSAN	20	N 32.29761°	W 90.90176°	Y	Y	Oil	B	15	Used Oil
DSAN	21	N 32.29761°	W 90.90176°	N	Y	Oil	B	55	Oil Drum Sealed
DSAN	22	N 32.29761°	W 90.90176°	N	Y	Oil	B	10	Oil
DSAN	23	N 32.29761°	W 90.90176°	N	Y	Oil	B	5	Oil
DSAN	24	N 32.29761°	W 90.90176°	Y	Y	Unknown	B	15	Allied Signal Genesolve 24
DSAN	25	N 32.29761°	W 90.90176°	Y	Y	Oil	B	5	Oil
DSAN	26	N 32.29761°	W 90.90176°	Y	Y	Oil	B	5	Superflo ATF D/M
DSAN	27	N 32.29761°	W 90.90176°	Y	Y	Oil	B	0	Teresstic 68
DSAN	28	N 32.29761°	W 90.90176°	Y	Y	Oil	B	10	Motor Oil Visa Super
DSAN	29	N 32.29761°	W 90.90176°	N	Y	Empty	B	0	Empty
DSAN	30	N 32.29761°	W 90.90176°	N	N	Unknown	B	55	By Building

DSAN Drum Storage Area North.

Other Containers: 6 - 5-gallon Cans
20 - 5-gallon Cans located in Building

Category A - Good (structurally sound)
Category B - Fair (rust present, note degree of rusting)
Category C - Poor (leaking, needs immediate removal)

ARCADIS

MISSISSIPPI BLUFFS
VICKSBURG, MISSISSIPPI
DRUM INVENTORY

Project Number: LA002656.0001.00004
Date: 11/21/2006
Coordinate System: GPS

Drum Area Location: Drum Storage Area South
Personnel: John Trahan

Area	ID #	Latitude	Longitude	Label Present (Y/N)	Secondary Containment (Y/N)	Substance (CAS #, if present)	Condition (A, B or C)	Vol (gal)	Notes
DSAS	1	N 32.29498°	W 90.90764°		Y	Empty	A	0	Empty
DSAS	2	N 32.29498°	W 90.90764°		Y	Empty	B	0	Empty
DSAS	3	N 32.29498°	W 90.90764°		Y	Empty	B	0	Empty
DSAS	4	N 32.29498°	W 90.90764°		Y	Empty	B	0	Empty
DSAS	5	N 32.29498°	W 90.90764°		Y	Empty	B	0	Empty
DSAS	6	N 32.29498°	W 90.90764°		Y	Empty	B	0	Empty
DSAS	7	N 32.29498°	W 90.90764°	Y	Y	Oil	B	55	Exxon Diol 13RD 40
DSAS	8	N 32.29498°	W 90.90764°	Y	Y	Oil	B	15	Used Oil
DSAS	9	N 32.29498°	W 90.90764°	Y	Y	Oil	B	5	SAE 80-90 weight Waring Oil Company
DSAS	10	N 32.29498°	W 90.90764°	Y	Y	Oil	B	5	SAE 10 weight Waring Oil Company
DSAS	11	N 32.29498°	W 90.90764°	Y	Y	Oil	B	10	Used Oil
DSAS	12	N 32.29498°	W 90.90764°	Y	Y	Oil	B	10	Exxon Terrestic 100 weight
DSAS	13	N 32.29498°	W 90.90764°	Y	Y	Oil	B	55	Exxon Hydraul 56
DSAS	14	N 32.29498°	W 90.90764°	N	Y	Oil	B	55	Used Oil
DSAS	15	N 32.29498°	W 90.90764°	Y	Y	Used Coolant	B	40	Used Antifreeze Water
DSAS	16	N 32.29498°	W 90.90764°	Y	Y	Oil	B	25	#3 Oil

Category A - Good (structurally sound)
Category B - Fair (rust present, note degree of rusting)
Category C - Poor (leaking, needs immediate removal)

ARCADIS

MISSISSIPPI BLUFFS
VICKSBURG, MISSISSIPPI
DRUM INVENTORY

Project Number: LA002656.0001.00004
Date: 11/21/2006
Coordinate System: GPS

Drum Area Location: Drum Storage Area South
Personnel: John Trahan

Area	ID #	Latitude	Longitude	Label Present (Y/N)	Secondary Containment (Y/N)	Substance (CAS #, if present)	Condition (A, B or C)	Vol (gal)	Notes
DSAS	17	N 32.29498°	W 90.90764°	N	Y	Empty	B	0	
DSAS	18	N 32.29498°	W 90.90764°	Y	Y	Oil	B	55	Used Oil
DSAS	19	N 32.29498°	W 90.90764°	Y	Y	Oil	B	55	10W30
DSAS	20	N 32.29498°	W 90.90764°	Y	Y	Oil	B	55	10W40
DSAS	21	N 32.29498°	W 90.90764°	Y	Y	Oil	B	55	80 weight
DSAS	22	N 32.29498°	W 90.90764°	Y	Y	Unknown Oil	B	55	Tribol Partial Label

DSAS Drum Storage Area South.

Other Containers: 4 - 5-gallon Cans
1 - Used Oil Tank

Category A - Good (structurally sound)
Category B - Fair (rust present, note degree of rusting)
Category C - Poor (leaking, needs immediate removal)

ARCADIS

MISSISSIPPI BLUFFS
VICKSBURG, MISSISSIPPI
DRUM INVENTORY

Project Number: LA002656.0001.00004
Date: 11/29/2006
Coordinate System: GPS

Drum Area Location: Drum Handling Area
Personnel: John Trahan

Area	ID #	Latitude	Longitude	Label Present (Y/N)	Secondary Containment (Y/N)	Substance (CAS #, if present)	Condition (A, B or C)	Vol (gal)	Notes
DHA	1	N 32.29467°	W 90.90646°	N	N	Unknown	B	55	Solid
DHA	2	N 32.29467°	W 90.90646°	Y	N	Unknown	B	55	Solid Activated Alumina
DHA	3	N 32.29467°	W 90.90646°	N	N	Unknown	B	27.5	Solid Activated Alumina
DHA	4	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	55	
DHA	5	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	55	
DHA	6	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	55	
DHA	7	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	55	
DHA	8	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	55	
DHA	9	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	55	
DHA	10	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	10	
DHA	11	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	5	
DHA	12	N 32.29435°	W 90.90673°	Y	Y	Waste Oil	B	5	
DHA	13	N 32.29435°	W 90.90673°	Y	Y	New Oil Sealed	B	55	Delta Weslovaco SCTO
DHA	14	N 32.29435°	W 90.90673°	Y	Y	New Oil Sealed	B	55	Delta Weslovaco SCTO
DHA	15	N 32.29435°	W 90.90673°	Y	Y	New Oil Sealed	B	55	Delta Weslovaco SCTO
DHA	16	N 32.29435°	W 90.90673°	Y	Y	New Oil Sealed	B	55	Delta Weslovaco SCTO

DHA Drum Handling Area.

Other Containers: 4 - Salvage Drums (Trash)
10 - Open-Top Drums (Absorbent Material)
Multiple 5-gallon Cans
Multiple 1-gallon Cans

Category A - Good (structurally sound)
Category B - Fair (rust present, note degree of rusting)
Category C - Poor (leaking, needs immediate removal)

ARCADIS

MISSISSIPPI BLUFFS
VICKSBURG, MISSISSIPPI
DRUM INVENTORY

Project Number: LA002656.0001.00004
Date: 11/27/2006
Coordinate System: GPS

Drum Area Location: Miscellaneous
Personnel: John Trahan

Area	ID #	Latitude	Longitude	Label Present (Y/N)	Secondary Containment (Y/N)	Substance (CAS #, if present)	Condition (A, B or C)	Vol (gal)	Notes
SLDY	1	N 32.29449°	W 90.90740°	Y	N	Unknown	B	55	Na Ph product
SLDY	2	N 32.29449°	W 90.90740°	Y	N	Unknown	B	55	Na Ph product
WOP		N 32.29601°	W 90.90760°	N	N	Unknown	B	55	8 Full; 1 Empty
WOP		N 32.29588°	W 90.90764°	N	N	Unknown	B	55	5 Full Solids
BL	1&2	N 32.29514°	W 90.90655°	N	N	Carbon	B	Unknown	2 Carbon Drums (200 pounds in each)
BL	3	N 32.29520°	W 90.90643°	Y	N	Lab Pack	B	Unknown	
VMS	1	N 32.29514°	W 90.90717°	N	Y	Oil	B	27.5	Used Oil (tub of oil and drain can next to it)
TOT	1	N 32.29456°	W 90.90689°	N	N	Tall Oil	A	37	Tall Oil From Leaking Tank
AT	1	N 32.29478°	W 90.90563°	Y	N	Waste Oil	B	55	Plastic Open Top With Cover
MKU	1	N 32.29371°	W 90.90805°	N	N	Unknown	A	55	Bung Open Plastic
MKU	2	N 32.29288°	W 90.90808°	Y	N	Hyd Oil	B	55	Used Oil
MKU	3	N 32.29288°	W 90.90808°	N	N	Empty	B	0	
MKU	4	N 32.29266°	W 90.90799°	Y	N	Betz Continuum	A	15	(Plastic) Water Treatment Chem
MC	1	N 32.29420°	W 90.90618°	N	N	Polymer Covered	B	Unknown	Surrounded by Polymer (North side of warehouse)
MC	2	N 32.29424°	W 90.90565°	Y	N	Betz Continuum	B	15	(Metal) Water Treatment Chem
NA	1	N 32.29442°	W 90.90549°	Y	N	Betz Control	A	5	Plastic In Building
NA	2	N 32.29442°	W 90.90549°	N	N	Possible NH3	B	Unknown	Small Amount

SLDY	Shop Lay Down Yard	TOT	Tall Oil Tank
WOP	West of Plant	AT	Ammonia Tank
BL	Behind Lab	MKU	MK Unit
VMS	Vehicle Maintenance Shop	MC	Multicote Unit

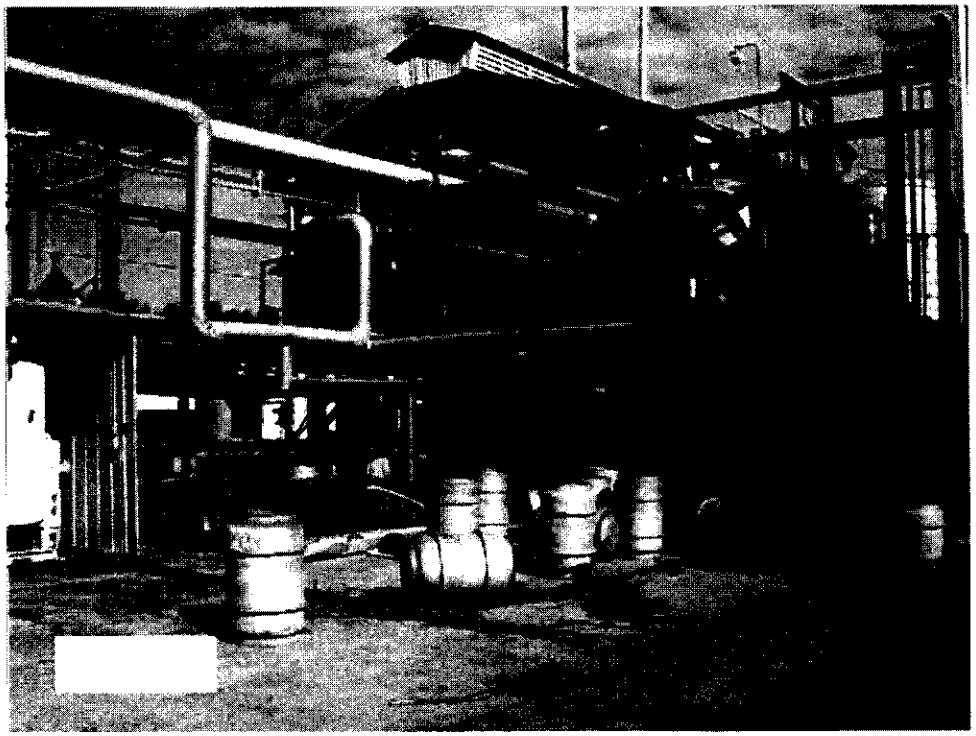
12 drums of anti-foam product in Machine Shop
W 32.29476° W 90.90664°

Category A - Good (structurally sound)
Category B - Fair (rust present, note degree of rusting)
Category C - Poor (leaking, needs immediate removal)

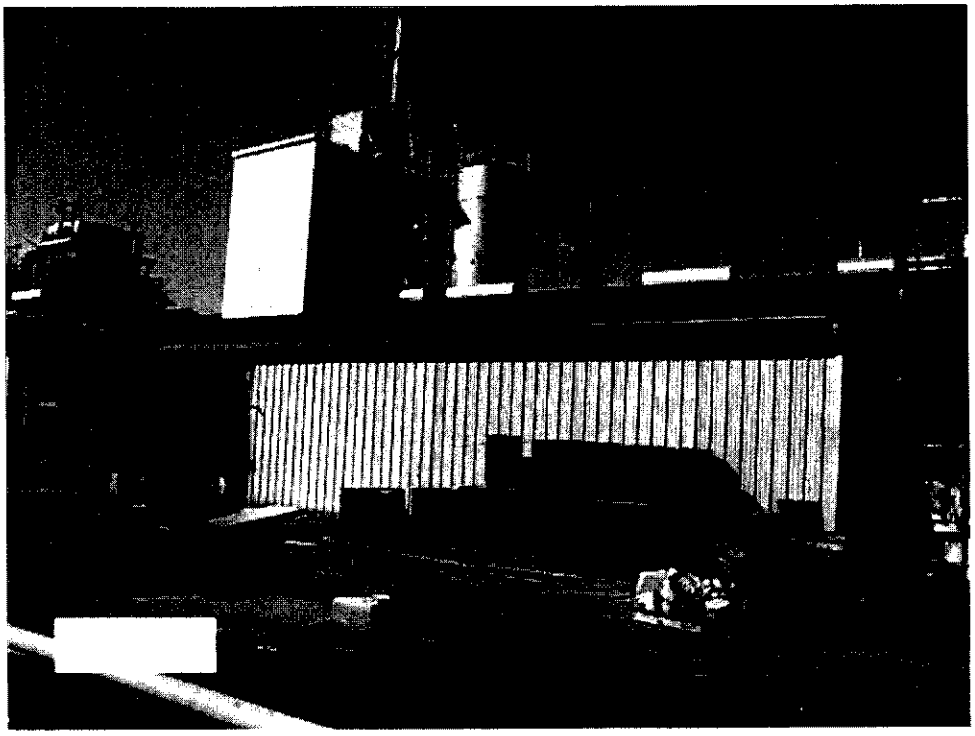
ARCADIS

Photographic Log

Mississippi Bluffs –
Drum Inventory



Photograph 1: Multicote Loading Rack – Drums – Looking North.



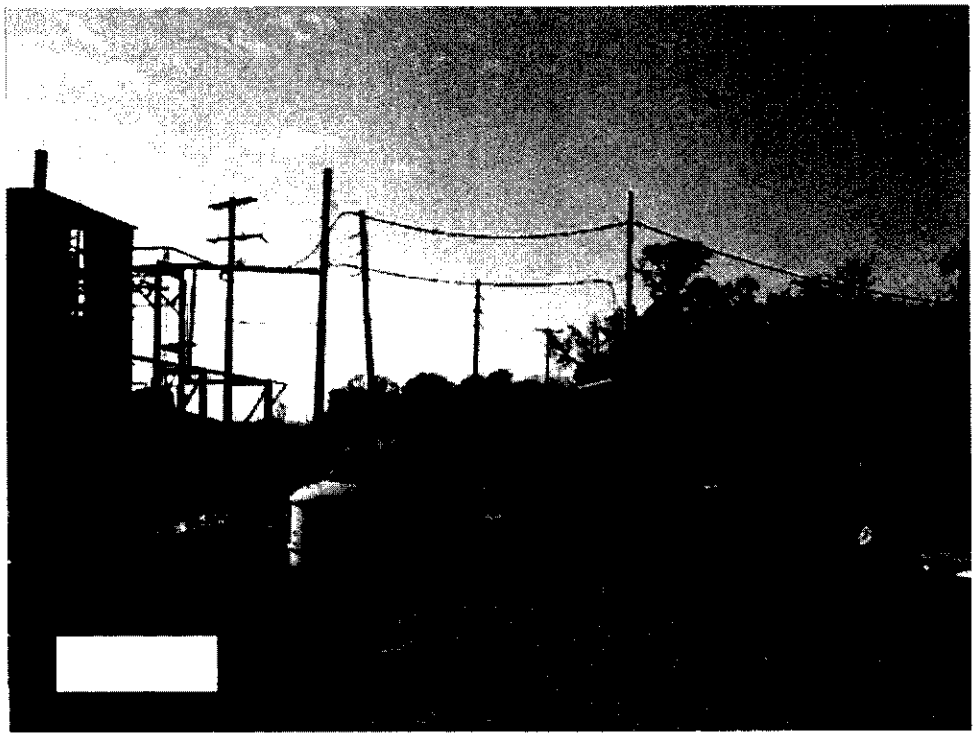
Photograph 2: Multicote Loading Rack – Castor Oil Drums – Looking Southwest.

Photograph 3: Drum Storage Area North – Looking West.

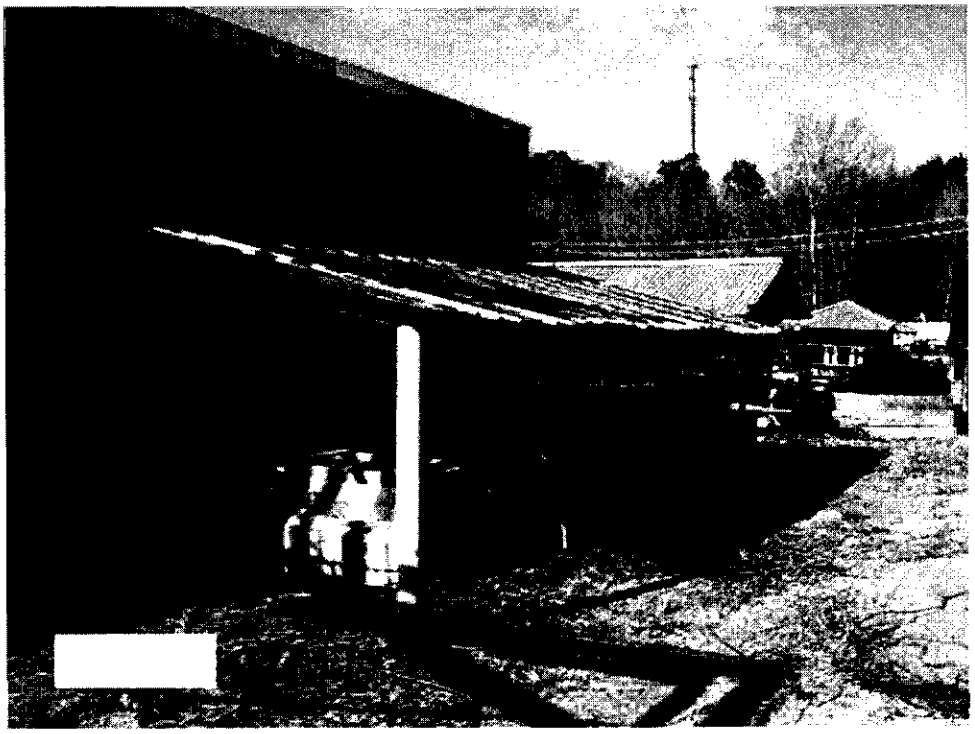
Photograph 4: Drum Storage Area South – Looking West.

Photograph 5: Drum Handling Area – Looking North.

Photograph 6: Drum Handling Area - Cans – Looking South.



Photograph 7: Shop Laydown Yard – Looking South.



Photograph 8: Behind Laboratory – Carbon Drums– Looking West.