

**URS Greiner Woodward Clyde**

*A Division of URS Corporation*

2822 O'Neal Lane  
Baton Rouge, LA 70816  
Tel: 225.751.1873  
Fax: 225.753.3616  
*Offices Worldwide*

October 7, 1999

Mr. Steve Boswell  
Vicksburg Chemical  
P. O. Box 821003  
Vicksburg, Mississippi 39180

Re: Amended and Supplemental RFI Work Plan  
URSGWC File No. 350096B315.00.00006

Dear Steve:

Attached are copies of the revised text of the proposed Amended and Supplemental RFI Work Plan. Except for completion of the figures the Groundwater Assessment Work Plan and RFI Work Plan are now current. Only one figure, which required minor modification, is needed for the RFI Work Plan; it is attached.

Submittal of the documents brings together all the work that has been done and summarizes that which remains. Most importantly it makes more difficult the loss of information and data due to delays. As the EPA continues to delay beyond reason, there may be changes in the participants at the EPA, at Vicksburg Chemical or at Vicksburg Chemical's consultants, any one of which can lead to loss of information or understanding which then has to be redone or relearned.

Very truly yours,



Richard D. Karkkainen

RDK:wv

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**F I N A L**

**AMENDED AND SUPPLEMENTAL  
RFI STRATEGY,  
CHARACTERIZATION, SCHEDULE  
AND MANAGEMENT PLAN**

*Prepared for*  
Vicksburg Chemical  
Vicksburg, Mississippi

October 8, 1999

File No. 350096B315.00.00006

***URS Greiner Woodward Clyde***

*A Division of URS Corporation*

2822 O'Neal Lane  
Baton Rouge, Louisiana 70816  
(225) 751-1873

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## ACRONYMS

| <u>Acronym</u> | <u>Meaning</u>  |
|----------------|---|
| CCC            | Cedar Chemical Corporation  |
| VCC            | Vicksburg Chemical Company  |
| RFI            | RCRA Facility Investigation                                       |
| RCRA           | Resource Conservation and Recovery Act                            |
| RFA            | RCRA Facility Assessment  |
| SWMU           | Solid Waste Management Unit                                       |
| AOC            | Area of Concern   |
| PECMT          | Preinvestigation - Evaluation of Corrective Measures Technologies |
| EPA            | United States Environmental Protection Agency                     |
| MSDEQ          | Mississippi Department of Environmental Quality                   |
| CMS            | Corrective Measures Study   |
| SWMU 1         | Hazardous Waste Container Storage Area                            |
| SWMU 17        | Off-specification Product Storage Area                            |
| SWMU 2         | Inactive Landfill will include AOC 4                              |
| SWMU 7         | Former Dinoseb Production Area                                    |
| SWMU 14        | Former Toxaphene Production Area                                  |
| SWMU 4         | Activated Carbon Treatment Unit                                   |
| SWMU 5         | South Plant Drainage System                                       |
| SWMU 8         | Dinoseb Loading/Unloading Area                                    |
| SWMU 9         | Dinoseb Drumming Area   |
| SWMU 11        | Former MSMA Production Area                                       |
| SWMU 12        | Former MSMA Unloading Area  |
| SWMU 13        | South Plant Drainage Ditches                                      |
| SWMU 15        | Former Methyl Parathion Production Area                           |
| SWMU 16        | Former Atrazine Production Area                                   |
| SWMU 17        | Returned Product Storage Area                                     |
| SWMU 18        | Former Blue Tank  |

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## ACRONYMS (Continued)

| <u>Acronym</u> | <u>Meaning</u>                                  |
|----------------|---|
| SWMU 20        | Railroad Car Loading/Unloading Station          |
| SWMU 22        | North Plant Neutralization System Concrete Sump |
| SWMU 25        | North Plant Subsurface Wastewater Pipes         |
| SWMU 29        | Floor under North Plan Oil Collection Unit      |
| SWMU 30        | North Plant Waste Accumulation Area             |
| SWMU 31        | North Plant No. 6 Fuel Oil Area                 |
| bgs            | below ground surface                            |
| TCL            | Toxic Compound List                             |
| TAL            | Toxic Analyte List                              |
| URSGWC         | URS Greiner Woodward Clyde                      |

Vicksburg Chemical Company (VCC) retained URS Greiner Woodward Clyde (URSGWC) to perform activities associated with a RCRA corrective action program. The corrective action program is in response to a Consent Decree which became effective July 1, 1991. The Consent Decree requires that a RCRA Facility Investigation (RFI) be conducted at the Vicksburg, Mississippi manufacturing facility.

The purpose of the RFI is to determine the nature and extent of releases of hazardous wastes and/or constituents from regulated units, solid waste management units (SWMUs), and other areas of concern (AOCs) at the facility and to gather all necessary data to support any corrective action required.

The RFI constitutes the second phase of the RCRA corrective action program. The program's initial phase consists of the RCRA Facility Assessment (RFA) which is conducted by the EPA and precedes the RFI. The RFI itself is divided into several separate tasks which includes the Preliminary Report (Report of Current Conditions, submitted previously by VCC then resubmitted as the Amended and Supplemental Preliminary Report and subsequently approved by the U.S. EPA), the RFI Work Plan (originally submitted in June 1996), the Facility Investigation, and the Investigative Analysis Reports (RFI Report). In addition to these phases, a Groundwater Assessment (GWA) Work Plan (originally submitted in June 1996), a Closure Plan for SWMU 1 and SWMU 17 (submitted and subsequently approved by the U.S. EPA) and Annual Groundwater Assessment Reports are required by the Consent Decree.

This document is a supplemental and amended work plan that defines and describes the RFI to be executed by VCC. The purpose of the RFI Work Plan is to establish procedures for collecting information as necessary to provide for protection of human health and the environment.

The RFI program consists of the following tasks:

- RFI Work Plan
- Implementation of the Work Plan
- Investigative Analysis Reports
- Corrective Measure Implementation Plan

The RFI Work Plan activities are intended to be executed concurrently with the GWA Work Plan. As will be described subsequently, a portion of the RFI program has been expedited because of VCCs need to expand its manufacturing and storage capability. The RFI Work Plan should be reviewed in conjunction with the GWA Work Plan. The GWA Work Plan includes the following elements:

- Number, location, depth of wells, and the rationale for any new well placement
- Construction logs for each monitoring well
- List of the monitoring parameters
- Geologic cross-sections
- Sampling and analytical methods for those hazardous wastes or hazardous constituents at the facility
- Evaluation procedures, including any use of previously-gathered groundwater quality information
- Schedule of implementation

The elements of the RFI Work Plan are organized and presented in this document in the following sections:

- Section 2 – RFI Work Plan Objectives
- Section 3 – Technical Approach
- Section 4 – Project Schedule and Submittals
- Section 5 – Project Management Plan
- Tables
  - Table 1 Description – SWMUs 1, 17 and 16
  - Table 2 Phase I Sampling Accomplished – SWMUs 1, 17 and 16
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    - Appendix C Health and Safety Plan
    - Appendix D Community Relations

The RFI Work Plan and the GWA Work Plan are guided by the information contained in the Amended and Supplemental Preliminary Report (February 1994 with November 1995 Revisions) and by those portions of the RFI program carried out to date. The SWMUs and AOCs are located on attached Figure 1. A list of SWMU's and AOCs identified as requiring field investigation as summarized from the Preliminary Report follows:

| <b>TABLE 1</b>                   |   |
|----------------------------------|---|
| <b>SWMU LISTING</b>              |   |
| <b>SWMU NUMBER</b>               | <b>SWMU NAME</b>  |
| <b>MAJOR FIELD INVESTIGATION</b> |   |
| 1 and 17                         | Hazardous Waste Container Storage Area and Off-Specification Product Storage Area |
| 2                                | Inactive Landfill - will include AOC 4  |
| 7                                | Former Dinoseb Production Area - will include SWMU 20                             |
| 9                                | Dinoseb Drumming Area   |
| 11                               | Former MSMA Production Area - will include SWMU 12 and SWMU 15                    |
| 14                               | Former Toxaphene Production Area  |
| 23                               | North Pond Area   |
| <b>MINOR FIELD INVESTIGATION</b> |   |
| 4                                | Activated Carbon Treatment Unit   |
| 5                                | South Plant Drainage System   |
| 8                                | Dinoseb Loading/Unloading Area  |
| 13                               | South Plant Drainage Ditches  |
| 16                               | Former Atrazine Production Area   |
| 17                               | Returned Product Storage Area   |
| 18                               | Former Blue Tank Area   |
| 22                               | North Plant Neutralization System Concrete Sump                                   |
| 25                               | North Plant Subsurface Wastewater Pipes   |
| 29                               | Floor under North Plant Oil Collection Unit                                       |
| 30                               | North Plant Waste Accumulation Area   |
| 31                               | North Plant No. 6 Fuel Oil Area   |
| 34                               | Junkyards   |

The following is a tabulation of SWMU activity at the site which was expedited because of VCC's plans to construct new manufacturing facilities and also utilized some of the SWMU areas for storage and for transportation related activity:

| <b>TABLE 2</b>                                    |                                      |  |                               |
|---|--------------------------------------|--|-------------------------------|
| <b>SWMU ACTIVITY</b>                              |                                      |  |                               |
| <b>Report</b>                                     | <b>Date</b>                          | <b>Status</b>                            | <b>Comment</b>                |
| RFI Work Plan<br>SWMUs 9 and 16                   | August 1994                          | Submitted                                | --                            |
| RFI Report<br>SWMUs 9 and 16                      | September 1994                       | Submitted                                | --                            |
| SWMU 23 North Pond<br>RFI Work Plan<br>RFI Report | October 1994                         | Submitted                                | 14 piezometers were installed |
| Closure Plan<br>SWMUs 1 and 17                    | February 1995<br>(Modified 10-26-95) | Approved by the<br>U.S. EPA and<br>MSDEQ | --                            |

| TABLE 2   |  |                                    |   |
|---|--|------------------------------------|---|
| SWMU ACTIVITY   |  |                                    |   |
| Report  | Date                                     | Status                             | Comment   |
| RFI Work Plan<br>Entire Site  | June 1996                                | Under Review                       | Incorporated investigative phase of "Closure Plan SWMUs 1 and 17"   |
| RFI Expedited Work Plan<br>SWMUs 12, 11, 15, 16, 1 and 17   | January 1997                             | Submitted                          | VCC planned to expand manufacturing capability into SWMU 12, 11 and 15 area or SWMU 16, 1 and 17 area     |
| RFI Report, Corrective Measures Study, RCRA Corrective Measures Implementation Plan<br>SWMUs 16, 1 and 17 | June 1997                                | Approved by the U.S. EPA and MSDEQ | --  |
| Corrective Action Management Unit Application   | June 1997                                | Approved by the U.S. EPA and MSDEQ | --  |
| RFI Report<br>SWMUs 12, 11 and 15   | April 1998                               | Submitted                          | --  |
| Corrective Measures Implementation Plan<br>SWMUs 12, 11 and 15  | April 1998<br>(as amended July 15, 1998) | Submitted                          | --  |
| Corrective Action Observation Confirmatory Sampling and Analysis<br>SWMUs 1 and 17                        | July 1998                                | Submitted                          | --  |
| Arsenic Data Sets<br>Arsenic Data Sets - Addendum   | October 15, 1998<br>October 26, 1998     | Submitted<br>Submitted             | Evaluation of arsenic background data.  |
| SWMU 9<br>Corrective Action Observation   | March 11, 1999                           | Submitted                          | --  |
| Observations and Sampling of Ditch  | September 8, 1999                        | Submitted                          | Surficial dinoseb contamination of soil noted during excavation of a ditch for a new water drainage line. |

The primary objectives for the RFI Work Plan are to establish procedures for collecting information as necessary to provide for protection of human health and the environment. Specifically, these objectives are to:

- Identify specific constituents of concern for SWMUs requiring further investigation;
- Determine whether or not SWMUs in question are releasing hazardous constituents into the environment;
- Identify the source(s) of contamination if a release of hazardous constituents is occurring;
- Determine the horizontal and vertical extent of contamination;
- Evaluate migration rates, pathways, and potential receptors; and
- Provide data for the evaluation of remedial alternatives and associated health risk assessments for the site.

These objectives will be obtained by implementing the RFI Work Plan which consists of the following:

- The Amended and Supplemental RFI Strategy, Characterization, Schedule and Management Plan which describes sample location rationale;
- The RFI Data Collection Quality Assurance Plan which describes how samples will be taken and the analyses performed; and
- The RFI Data Management Plan which describes how data will be handled and communicated.

**3.1 RFI WORK PLAN RATIONALE**

The rationale which forms the basis for this RFI Work Plan and the GWA Work Plan is based on VCC's process knowledge of the SWMUs requiring further investigation, VCC's groundwater monitoring program, and information obtained during the investigation of SWMUs 9, 16, 23, 1, 17, 12, 11 and 15. The process knowledge is summarized in the Preliminary Report. The groundwater monitoring program analytical and piezometric data and geologic, analytical and piezometric data obtained from various studies and assessments are summarized within the GWA Work Plan so as to obviate the need for repetition of effort.

The location and historic boundary of each SWMU is shown in Figure 1. The environmental setting and potential receptors/pathways for the entire site were summarized in the Preliminary Report. The remaining information to be gathered during the RFI and GWA includes the following:

- The vertical and horizontal extent of releases that have or are occurring within the SWMU boundaries which could potentially impact human health or the environment.
- The transport mechanisms, rates, and pathways for migration of hazardous constituents from SWMU areas.

For the former production areas, it is necessary to determine if hazardous constituents are migrating out of the SWMU area through surface water or groundwater. If there are indications of release, the vertical and horizontal extent of established constituents of concern will be assessed and data will be gathered to determine flow directions and pathways.

Storage areas will be approached from the standpoint that the type of hazardous constituents stored in the units are known. The extent of contamination, if any, will therefore be assessed, followed by a study of migration rates, pathways, and potential receptors.

The field investigation will proceed in phases. Phase I will focus on areas of surficial contamination within the SWMUs or AOCs that are suspected or confirmed to have a release. Details of Phase I sampling are provided in Section 3.2. Evidence of surficial contamination will trigger subsequent investigation of groundwater in these areas. Additionally, if there are

informational deficiencies in the existing monitor well program, those deficiencies will be filled with the installation of additional wells during Phase I.

A Phase II Field Investigation Work Plan will be prepared, if required, for those areas where additional information is needed. The primary objective of Phase II will be to establish the vertical and horizontal extent of contamination, if it is not adequately established in Phase I. The Phase II Work Plan will, for example, establish additional sample points for surficial sampling, if the horizontal extent is not adequately established in Phase I. The Phase II Work Plan will also identify locations for monitor wells for individual SWMUs where there is evidence of releases.

### **3.2 PHASE I SAMPLING – SITE CHARACTERIZATION**

The primary purpose of Phase I will be to determine if the SWMU is releasing hazardous constituents into the environment. After the results of Phase I are known it may be necessary to further delineate the extent of contamination in excess of action levels. The additional sampling and analysis is described in Section 3.4 Phase II Sampling.

#### **Background**

Two background samples will be submitted for analysis in order to establish normal concentration ranges for elements in soils and for quality control. The background sample locations will be randomly taken from the area to the north-northwest of the main administration building. The area was previously a borrow area and is now a parking lot. The samples will be obtained from undisturbed areas surrounding the parking lot. The borrow area is not known to have been affected by plant operations. Samples were obtained in the same area for a determination of the background concentration of arsenic. The background samples will be composited from four boreholes between 0 to 12 inches and four boreholes from 12 to 36 inches below present ground surface for comparison to samples taken from the SWMUs under investigation. The sample will be analyzed for all the Constituents of Concern noted in the discussions of the sampling at each SWMU.

**3.2.1 SWMU 1 – Hazardous Waste Container Storage Area, SWMU 17 – Off-Specification Product Storage Area, and SWMU 16 – Former Atrazine Production and Storage Area**

As noted in the description of SWMU Activity presented in the introduction, there has been considerable work accomplished at SWMUs 1, 17 and 16. A brief summary describing the areas and the history are noted below:

**TABLE 1**

**DESCRIPTION – SWMUs 1, 17 and 16**

| <b>SWMU Number</b> | <b>Unit Name</b>                | <b>Physical Description</b>   | <b>Former Function</b>   |
|--------------------|---------------------------------|---|--|
| 1                  | Container (Drum) Storage Area   | 80 foot by 80 foot concrete pad with containment curbs.   | Less than 90 day storage area.   |
| 17                 | Returned Product Storage Area   | The unit is located on a concrete slab floor with a tin roof. The unit is adjacent to the Container (Drum) Storage Area (SWMU 1). | Temporary storage for returned and off-spec product.   |
| 16                 | Former Atrazine Production Area | The unit consists of trenches, sumps, production vessels, and tanks.  | Chemical processing area which produced and stored atrazine. Warehouse is currently used to store Kcarb. |

The sampling of the SWMUs occurred in two phases, as summarized below:

**TABLE 2**

**PHASE I SAMPLING ACCOMPLISHED – SWMUs 1, 17 and 16**

| <b>SWMU Number</b>             | <b>Sample Description</b> | <b>Sample Points</b> | <b>Number of Samples</b> | <b>Analyte List</b> |
|--------------------------------|---------------------------|----------------------|--------------------------|---------------------|
| 16<br>Atrazine Warehouse       | Concrete and Soil         | 5 concrete and soil  | 15                       | C                   |
|                                | Soil                      | 1 soil               | 2                        | B                   |
| 16<br>Atrazine Production Area | Concrete and Soil         | 6                    | 18                       | C                   |
|                                | Soil                      | 11                   | 22                       | B                   |

**TABLE 2**

**PHASE I SAMPLING ACCOMPLISHED – SWMUs 1, 17 and 16**

| <b>SWMU Number</b>                                 | <b>Sample Description</b> | <b>Sample Points</b> | <b>Number of Samples</b> | <b>Analyte List</b> |
|--|---------------------------|----------------------|--------------------------|---------------------|
| 1, 17<br>Container Storage and<br>Off-Spec Storage | Concrete and Soil         | 10 concrete and soil | 30                       | A                   |
|  | Soil                      | 2 soil               | 4                        | A                   |

**TABLE 3**

**PHASE II SAMPLING ACCOMPLISHED – SWMUs 1, 17 and 16**

| <b>SWMU Number</b>                                 | <b>Sample Description</b> | <b>Sample Points</b> | <b>Number of Samples</b> | <b>Analytes</b>          |
|--|---------------------------|----------------------|--------------------------|--------------------------|
| 16<br>Atrazine Warehouse                           | Soil and Groundwater      | 2                    | 7                        | Toxaphene                |
|  |                           | 1                    | 4                        | Toxaphene<br>and Arsenic |
| 16<br>Atrazine Production<br>Area                  | Soil and Groundwater      | 1                    | 4                        | Toxaphene                |
| 1, 17<br>Container Storage and<br>Off-Spec Storage | Concrete                  | 1                    | 1                        | Dinoseb and<br>Arsenic   |
| Background   | Soil                      | 6                    | 6                        | Arsenic                  |

**LEGEND:**

- A Atrazine, Cyanazine, Arsenic, Dinoseb, Toxaphene, Toluene
- B TCL, TAL, Atrazine, Cyanazine, Dinoseb
- C Atrazine, Cyanazine, Arsenic, Dinoseb, Toxaphene

The sequence of events and results are presented in detail in the following publications:

- Closure Plan SWMUs 1 and 17, February 1995 (modified October 26, 1995)
- RFI Expedited Work Plan SWMUs 12, 1, 15, 16, 1 and 17, January 1997
- RFI Report, Corrective Measures Study, RCRA Corrective Measures Implementation Plan SWMUs 16, 1 and 17, June 1997
- Corrective Action Observation Confirmatory Sampling and Analysis, July 1998
- Arsenic Data Sets, October 15, 1998 and October 26, 1998

The "Corrective Measures Implementation Plan" summarizes the analytical data and clean up plan. "Arsenic Data Sets" provides interpretation of the relatively high concentration of arsenic as a background value. The clean up plan was executed and the results reported in the document "Corrective Action Observation Confirmatory Sampling and Analysis". SWMUs 1, 17 and 16 can now be considered clean areas.

### **3.2.2 SWMU 2 – Inactive Landfill**

The Inactive Landfill will be investigated for a release of hazardous constituents into the soils and uppermost groundwater. During the initial phase, continuous sampling at a maximum of three locations as shown in Figure 1 will be performed until groundwater is reached at 90 to 100 feet measure level (msl). Groundwater samples will be obtained. Two soil samples will be collected from each 5-foot increment. One sample will be stored on ice for possible delivery to the analytical laboratory. The second sample will be placed in a jar, covered with foil, sealed with a lid and kept at ambient temperature for a minimum of 15 minutes. Field "head space" analysis will be performed on the sample by inserting the HNu or OVA (photoionization or flame ionization device) into the jar and recording measurements. Samples with detectable volatile organic vapors will be eligible for analysis. If no "head space" readings are noted, two samples from each boring will be taken for verification and analysis in the laboratory. One sample will be taken from the 5-foot increment immediately above the uppermost groundwater zone and another will be taken from the initial 5-foot increment. An additional sample will be taken for analysis in the laboratory if "head space" readings are noted. As previously noted one sample will be taken from the 5-foot increment immediately above the uppermost groundwater zone and another taken from the initial 5-foot increment; additionally a sample will be taken that represents the 5-foot increment with the highest "head space" reading.

This sampling phase will determine the vertical extent of the contamination. The maximum horizontal extent of the contamination in the uppermost 30 feet is defined by the natural boundary of the landfill edge. Seven shallow (hand auger) borings will be taken in the runoff area west of SWMU 2 and sloped toward the southwest to determine if, through surface water runoff and erosion, hazardous constituents have been released from SWMU 2 and the vertical and horizontal extent of that contamination. The hand auger borings will be 2½ feet in depth. A sample will be obtained in the 6- to 12-inch below ground surface (bgs) elevation and the 24- to 30-inch bgs elevation.

The samples will be analyzed for the Toxic Compound List (TCL) and the Toxic Analyte List (TAL) plus atrazine, cyanazine and dinoseb. The TCL and TAL are found in the attached RFI QAP.

The total number of samples to be submitted for analysis shall be as follows:

| <b>TABLE 4</b>                    |                    |                     |                            |
|-----------------------------------|--------------------|---------------------|----------------------------|
| <b>SAMPLING PROPOSED – SWMU 2</b> |                    |                     |                            |
| <b>SWMU No.</b>                   | <b>Description</b> | <b>Soil Samples</b> | <b>Groundwater Samples</b> |
| 2                                 | Top of Landfill    | 9                   | 3                          |
|                                   | S.W. Runoff        | 14                  | 0                          |

### **3.2.3 SWMU 4 – Activated Carbon Treatment Unit**

The soil around the Activated Carbon Treatment Unit containment pad will be sampled. Six auger borings will be made to a depth of 12 inches. Samples will be taken from the 6- to 12-inch depth. These samples will be analyzed for TCL, TAL plus atrazine, cyanazine and dinoseb. Due to the proximity of the Former Dinoseb Production Area (SWMU 7) and Railroad Loading/Unloading Station (SWMU 20) to SWMU 4, Phase I sampling around the Carbon Treatment Units will be limited to the perimeter of the concrete pad.

| <b>TABLE 5</b>                    |                    |                       |
|-----------------------------------|--------------------|-----------------------|
| <b>SAMPLING PROPOSED – SWMU 4</b> |                    |                       |
| <b>SWMU No.</b>                   | <b>Description</b> | <b>No. of Samples</b> |
| 4                                 | Perimeter Soil     | 9                     |
|                                   |                    | 14                    |

### **3.2.4 SWMU 5 – South Plant Drainage System**

The Phase I investigation will involve onsite discrete soil sampling and analysis for atrazine, cyanazine, arsenic, dinoseb and toxaphene at 200-foot intervals adjacent to the pipe. The samples will be taken in the 6-inch interval at the depth of the buried drainage pipes and conduits. (Some of the drainage pipes are 10 feet below ground surface.) For pipes on the ground surface, samples will be taken from a depth of 6 to 12 inches. Samples will be analyzed

for atrazine, cyanazine, arsenic, dinoseb and toxaphene. Sample locations are not located on Figure 1. The entire south plant drainage system is not depicted on Figure 1 and is not available on a composite drawing. A summary of the samples is as follows:

| TABLE 6                    |                                 |                |
|----------------------------|---------------------------------|----------------|
| SAMPLING PROPOSED – SWMU 5 |                                 |                |
| SWMU No.                   | Description                     | No. of Samples |
| 5                          | From S. Rainwater Sump to Ponds | 6              |
| 5                          | S. Drainage Loop                | 6              |
| 5                          | N. Drainage Loop                | 4              |

**3.2.5 SWMU 7 – Former Dinoseb Production Area (Includes SWMU 20 – Railroad Car Loading/Unloading Station)**

Two sets of samples will be taken during the Phase 1 investigation of the Former Dinoseb Production Area. One set of samples will be taken from 6 to 12 inches bgs and a second set of samples will be taken from 36 to 42 inches bgs. The samples will be taken 200 feet apart along each major section of the railroad track from south rainwater sump to the old Nitric Acid Plant. These samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

The soil beneath the area where the concrete pad which formed the foundation for the former production area will be sampled. Three samples for 6 to 12 inches bgs and three samples from 32 to 42 inches bgs will be taken. These samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

The total number of samples to be submitted for analysis shall be as follows:

| TABLE 7                            |                         |                |
|------------------------------------|-------------------------|----------------|
| SAMPLING PROPOSED – SWMUs 7 AND 20 |                         |                |
| SWMU No.                           | Description             | No. of Samples |
| 7                                  | Dinoseb Production Area | 6              |
| 20                                 | Railroad Area           | 36             |

**3.2.6 SWMU 8 – Dinoseb Loading/Unloading Area**

The Dinoseb Loading/Unloading Area (SWMU 8) is covered by a concrete pad. This pad contains sumps and drainage trenches. Two concrete samples will be taken. Four soil samples will be taken below the concrete cores at depths from 6 to 12 inches bgs and also 18 to 24 inches bgs. The sampling locations are shown in Figure 1. The samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb, toxaphene and toluene.

The total number of samples to be submitted for analysis are as follows:

| <b>TABLE 8</b>                    |                    |                       |
|-----------------------------------|--------------------|-----------------------|
| <b>SAMPLING PROPOSED – SWMU 8</b> |                    |                       |
| <b>SWMU No.</b>                   | <b>Description</b> | <b>No. of Samples</b> |
| 8                                 | Concrete           | 2                     |
|                                   | Shallow Soil       | 2                     |
|                                   | Deep Soil          | 2                     |

**3.2.7 SWMU 9 – Dinoseb Drumming Area**

As noted in the description of SWMU Activity presented in the introduction, there has been considerable work accomplished at SWMU 9. A brief summary describing the area and the history is noted below:

| <b>TABLE 9</b>              |                   |   |   |
|-----------------------------|-------------------|---|---|
| <b>DESCRIPTION – SWMU 9</b> |                   |   |   |
| <b>SWMU No.</b>             | <b>Unit Name</b>  | <b>Physical Description</b>                       | <b>Former Function</b>                  |
| 9                           | Drumming Building | 225' x 75' warehouse building with concrete floor | Package dinoseb in drums and containers |

The sampling of SWMU 9 occurred in two episodes, as summarized below:

| TABLE 10                                 |                    |               |                |              |
|--|--------------------|---------------|----------------|--------------|
| EPISODE I SAMPLING ACCOMPLISHED – SWMU 9 |                    |               |                |              |
| SWMU No.                                 | Sample Description | Sample Points | No. of Samples | Analyte List |
| 9  | Soil and concrete  | 8             | 16             | F            |

| TABLE 11                                  |                      |               |                                 |              |
|---|----------------------|---------------|---------------------------------|--------------|
| EPISODE II SAMPLING ACCOMPLISHED – SWMU 9 |                      |               |                                 |              |
| SWMU No.                                  | Sample Description   | Sample Points | No. of Samples                  | Analyte List |
| 9   | Soil and groundwater | 5             | 6<br>(5 soil and 1 groundwater) | B            |

**LEGEND:**

- B TCL, TAL, Atrazine, Cyanazine, Dinoseb
- F BTEX, TPH, Atrazine, Cyanazine, Arsenic, Dinoseb, Toxaphene

The sequence of events and results are presented in detail in the following publications:

- RFI Work Plan SWMUs 9 and 11, August 1994
- RFI Report SWMUs 9 and 16, September 1994
- SWMU 9 Corrective Action Observation, March 1999

The “Corrective Action Observations” summarizes the clean up activity that occurred and the analytical data. The northern two-thirds of SWMU 9 can be considered to be clean.

**3.2.8 SWMU 11 – Former MSMA Production Area – will include SWMU 12 – Former MSMA Unloading Area and SWMU 15 – Former Methyl Parathion Production Area**

As noted in the description of SWMU Activity presented in the introduction, there has been considerable work accomplished at SWMUs 11, 12 and 15. A brief summary describing the area and the history is noted below:

| <b>TABLE 12</b>                           |   |   |   |
|---|---|---|---|
| <b>DESCRIPTIONS – SWMUs 12, 11 and 15</b> |   |   |   |
| <b>SWMU No.</b>                           | <b>Unit Name</b>                        | <b>Physical Description</b>   | <b>Former Function</b>  |
| 12  | Former MSMA Salt Unloading Area         | Two concrete lined bays (15 to 10 feet) covered by a roof.  | MSMA by-product salts were loaded into sludge dumpsters for offsite disposal. |
| 11  | Former MSMA Production Area             | The unit consists of trenches, sumps and product storage tanks. The unit has been 90% dismantled. | Chemical processing area which produced MSMA.                                 |
| 15  | Former Methyl Parathion Production Area | The unit is located on the same site as the Former MSMA Production Area (SWMU 11).                | Chemical processing area which produced methyl parathion.                     |

The sampling SWMUs 12, 11 and 15 occurred in two phases, as summarized below:

The sequence of events and results are presented in detail in the following publications:

- RFI Expedited Work Plan SWMUs 12, 11, 15, 16 and 17, January 1997
- RFI Report SWMUs 12, 11 and 15, April 1998
- Corrective Measure Implementation Plan, April 1998 (as amended July 15, 1998)

The RFI Report summarizes the analytical data available for the site. The Corrective Measures Implementation Plan describes corrective measures to be taken after approval by the U.S. EPA and MSDEQ.

| <b>TABLE 13</b>   |                                |                       |                     |
|---|--------------------------------|-----------------------|---------------------|
| <b>PHASE I SAMPLING ACCOMPLISHED – SWMUs 12, 11 and 15</b>                        |                                |                       |                     |
| <b>Description</b>  | <b>No. of Sample Locations</b> | <b>No. of Samples</b> | <b>Analyte List</b> |
| Sludge/sediment sample location (TCL, TAL, atrazine, cyanazine, dinoseb, dioxin)  | 10                             | 10                    | D                   |
| Concrete, asphalt or soil sample (TCL, TAL, atrazine, cyanazine, dinoseb, dioxin) | 4                              | 5                     | D                   |
| Concrete of asphalt and or soil (arsenic only)                                    | 21                             | 45                    | G                   |

| Description  | No. of Sample Locations | No. of Samples | Analyte List |
|--|-------------------------|----------------|--------------|
| Wipe. 100 square centimeter of five locations: Floor 1 inside laboratory duct. Floor 2 wall, horizontal column and inside chute (arsenic only) | 5                       | 5              | G            |
| 10-foot boring (analyze for toxaphene, dinoseb, arsenic, and BTEX)   | 5                       | 15             | H            |
| 1-foot boring (analyze for toxaphene, dinoseb, arsenic, and BTEX)  | 4                       | 4              | H            |
| QA/QC matrix spike and matrix spike duplicate samples at 3-2-G, 0-2-G, 3-C-G   | 3                       | 6              | G            |
| QA/QC matrix spike and matrix spike duplicate at 6-1-D, M-1-D  | 2                       | 4              | D            |
| QA/QC matrix spike and matrix spike duplicate at 5-2   | 1                       | 2              | H            |

| SWMU No. | Sample Description | Sample Points | No. of Samples | Analyte List |
|----------|--------------------|---------------|----------------|--------------|
| 12/11    | Soil               | 13            | 51             | G            |
| 12/11    | Groundwater        | 13            | 13             | G            |
| 12/11    | Soil               | 1             | 1              | G            |

## LEGEND:

- C Atrazine, Arsenic, Dinoseb, Toxaphene
- D TCL, TAL, Atrazine, Cyanazine, Dioxin
- G Arsenic
- H BTEX, Arsenic, Dinoseb, Toxaphene

### 3.2.9 SWMU 13 – South Plant Drainage Ditches

The investigation of the major South Plant Drainage Ditch will involve onsite discrete sediment sampling and analysis. Sediment samples will be taken from 6 to 12 inches in depth at 200 foot intervals along the drainage ditch. Samples will be taken from SWMU 34 (Junkyard) to the vicinity of the railroad track.. Samples will be taken during the investigation. The sample points are depicted on Figure 1.

Samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

### 3.2.10 SWMU 14 – Former Toxaphene Production Area

The soil beneath the Former Toxaphene Production Area (SWMU 14) will be sampled. Areas adjacent to SWMU 14 will be sampled and analyzed under a similar sampling program for SWMU 7 (including SWMU 20). Three soil samples locations are established in the area. Three 6- to 12-inch bgs samples and three 36- to 42-inch bgs samples will be taken. These samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

A summary of the samples is as follows:

| <b>SWMU No.</b> | <b>Description</b>   | <b>No. of Samples</b> |
|-----------------|----------------------|-----------------------|
| 14              | Soil – 6” – 12” bgs  | 3                     |
| 14              | Soil – 36” – 42” bgs | 3                     |

### 3.2.11 SWMU 18 – Former Blue Tank Area

Three soil surface samples will be taken in the immediate location of the Former Blue Tank (SWMU 18). The samples will be taken from 6 to 12 inches in depth. The samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

An additional two samples will be obtained in the roadway to the south of the Former Blue Tank Area. During excavation of a ditch to construct a new water drainage line some discoloration of soil due to dinoseb was noted in the surface soil approximately 75 feet from the Former Blue Tank Area. A description of an observation and investigation of the ditch is described in “Observations and Sampling of Ditch,” August 19, 1999. The dinoseb could have originated from spills on unloading/loading at the Blue Tank Area.

A summary of the samples is as follows:

| TABLE 16                    |             |                |
|-----------------------------|-------------|----------------|
| SAMPLING PROPOSED – SWMU 18 |             |                |
| SWMU No.                    | Description | No. of Samples |
| 18                          | Soil        | 5              |

**3.2.12 SWMU 30 – North Plant Waste Oil Accumulation Area**

The North Plant Waste Oil Accumulation Area will be investigated for a release of hazardous constituents into the surface soils. Sampling at three locations will be performed to a depth of 6 to 12 inches bgs. Samples will be selected for benzene, ethylbenzene, toluene, xylene (BTEX) and total petroleum hydrocarbon (TPH) analysis. A summary of the samples is as follows:

| TABLE 17                    |             |                |
|-----------------------------|-------------|----------------|
| SAMPLING PROPOSED – SWMU 30 |             |                |
| SWMU No.                    | Description | No. of Samples |
| 30                          | Soil        | 3              |

**3.2.13 SWMU 34 – Surplus Equipment Storage (Junkyard)**

Each Surplus Equipment Storage area will be tested for soil contamination. Three surface samples from 6 to 12 inches bgs will be completed in both the North and South Plant junkyards. The samples will be analyzed for BTEX, TPH, atrazine, cyanazine, arsenic, dinoseb and toxaphene. A summary of the samples is as follows:

| TABLE 18                    |                |                |
|-----------------------------|----------------|----------------|
| SAMPLING PROPOSED – SWMU 34 |                |                |
| SWMU No.                    | Description    | No. of Samples |
| 34                          | South Junkyard | 3              |
|                             | North Junkyard | 3              |

**3.3 EVALUATION OF DATA FROM PHASE I**

The following table is a summary of the contamination sampling to be executed during Phase I (note that some of the sampling has been completed):

| TABLE 19   |                              |                          |              |                     |
|--|------------------------------|--------------------------|--------------|---------------------|
| SUMMARY RFI SAMPLING ACCOMPLISHED AND PROPOSED                               |                              |                          |              |                     |
| SWMU Number  | Sample Points                | Soil or Concrete Samples | Analyte List | Groundwater Samples |
| 1/17 – Storage   | Sampling has been completed. |                          |              |                     |
| 2 – Landfill   | 10                           | 23                       | B            | 3                   |
| 4 – Activated Carbon Treatment   | 6                            | 6                        | B            | 0                   |
| 5 – South Plant Drainage   | 16                           | 16                       | C            | 0                   |
| 7/20 – Former Dinoseb Production Area/Railroad Car Loading/Unloading Station | 21                           | 42                       | A            | 0                   |
| 8 – Dinoseb Loading/Unloading Area   | 2                            | 6                        | A            | 0                   |
| 9 – Dinoseb Drumming Building  | Sampling has been completed. |                          |              |                     |
| 11/12/15 MSMA-Methyl Production Area   | Sampling has been completed. |                          |              |                     |
| 13 – West Drainage   | 9                            | 9                        | C            | 0                   |
| 14 – Toxaphene   | 3                            | 6                        | C            | 0                   |
| 16 – Atrazine  | Sampling has been completed. |                          |              |                     |
| 18 – Blue Tank   | 5                            | 5                        | C            | 0                   |
| 23 – North Pond  | Sampling has been completed. |                          |              |                     |
| 30 – Waste Oil   | 3                            | 3                        | E            |                     |
| 34 – Junkyard  | 6                            | 6                        | F            | 0                   |

## LEGEND:

- A Atrazine, cyanazine, arsenic, dinoseb, toxaphene, toluene
- B TCL, TAL, atrazine, cyanazine, dinoseb
- C Atrazine, cyanazine, arsenic, dinoseb, toxaphene
- D TLC, dioxin, TAL, atrazine, cyanazine, dinoseb
- E BTEX, TPH
- F BTEX, TPH, atrazine, cyanazine, arsenic, dinoseb, toxaphene

In addition, as described in the “Amended and Supplemental Groundwater Assessment Work Plan,” October 8, 1999 the following monitor wells will be constructed:

- MW-17A and 17B – Nested pair downgradient from SWMU 17, 11 and 15;
- MW-18A and 18B – Nested pair downgradient from SWMU 9;
- MW-12C – Well adjacent to MW-12; MW-12 and 12C will be a nested pair; and
- MW-10C – Well adjacent to MW-10; MW-10 and 10C will be a nested pair.

During the field phase of the groundwater assessment the following will be sampled:

| <b>TABLE 20</b>   |                            |                     |
|---|----------------------------|---------------------|
| <b>SUMMARY GROUNDWATER SAMPLING ACCOMPLISHED AND PROPOSED</b>   |                            |                     |
| <b>Monitor Well Nos.</b>  | <b>Groundwater Samples</b> | <b>Analyte List</b> |
| MW-1A, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-10C, MW-11, MW-12, MW-12C, MW-13, MW-14, MW-16, MW-17A, MW-17B, MW-18A, and MW-18B | 21                         | B                   |

Upon completion of the field investigation of Phase I, the next step will involve the analysis of all soil and groundwater data collected. The analysis will include the data collected previously in the investigations of SWMUs 1, 16, 17, 12, 11, 15, 23 and 9 and the data accumulated in the monitoring well program (Appendix H – GWA).

The analysis of data will be summarized and presented to the EPA and MSDEQ in a Field Investigation report. The report will discuss the sampling and analytical results and present the data in a concise manner along with conclusions and recommendations. In the event that a release or potential release of established contaminants of concern is not indicated, the report could include recommendations for no further action. If a release is indicated, the report will be issued as Interim with a Phase II sampling plan to fully determine the extent of contamination if sampling during Phase I was not sufficient. A Groundwater Assessment Report will be issued in the same time frame.

### **3.4 PHASE II SAMPLING**

The data obtained in Phase I will be used to focus on specific areas within the SWMUs that are suspected or confirmed to have a release. The Phase I data will also identify those specific constituents of concern suspected or confirmed to have been released from each SWMU area and whether a continuing or residual source of those constituents is present.

If necessary, a separate Phase II plan will be prepared for specific SWMU areas and types of releases; however, the rationale is described herein. The primary objective of Phase II will be to establish the vertical and horizontal extent of contamination if it is not adequately established in Phase I. Additional horizontal delineation will be obtained by taking surficial soil samples

further from the source. Additional vertical delineation will be obtained by soil borings and groundwater sampling.

### **3.5 EVALUATION OF DATA FROM PHASE II**

The data collected in Phase II will be analyzed and summarized to be presented to the EPA and MSDEQ. The report will discuss the source, nature, and extent of contamination in relation to the background levels indicative of the area. The Final RFI Report and the Final Groundwater Assessment Report will be based on Phase I and II results.

**4.1 RFI FIELD INVESTIGATION WORK PLAN SCHEDULE**

The RFI project schedule is a function of U.S. EPA schedule of review. VCC will issue an Interim or Draft RFI Report within 90 days of the U.S. EPA approval of work plans.

**4.2 REPORTING REQUIREMENTS**

Several reports are mandated by the Consent Decree. Due dates for these reports are also mandated in the Consent Decree.

**4.2.1 Progress Reports**

Monthly progress reports dated the 10th of the month are being provided to EPA and MSDEQ containing:

- Description and estimate of the percentage of the RFI completed
- Summaries of all findings
- Summaries of all changes made in the RFI during the reporting period
- Summaries of all contacts with representatives of the local community, public interest groups, or State government during the reporting period
- Actions being taken to rectify problems
- Changes in personnel during the reporting period
- Projected work for the next reporting period
- Copies of daily reports, inspection reports, laboratory/monitoring data, etc.

**4.2.2 Interim RFI Reports**

The first report will be compiled at the conclusion of Phase 1. The report will include the following:

- Discussion of work accomplished to date
- Summary of findings
- Conclusions and recommendations
- Supporting analytical and field data

The first reports will include a discussion of QA/QC results, changes in project personnel and any new issues that would impact the RFI. Each report will have appropriate drawings, tables, figures, charts, bar graphs, maps, cross-sections, and other diagrams as needed to allow for a clear understanding of the nature and extent of any potential contaminations that may exist at the site.

#### **4.2.3 Draft Final RFI Report and Final RFI Reports**

At the completion of all of the phases of the RFI field investigation, a Draft Final RFI Implementation Report will be submitted to EPA and MSDEQ as required by the Consent Decree. The report will contain an analysis and summary of all facility investigations implemented. Additionally, the report will also identify and discuss applicable protection standards for groundwater. Finally, the report will include, when necessary, the following elements:

- Synopsis of the RFI field investigation
- Explanation of any modifications to the work plan and why these were necessary for the project
- Inspection summary reports
- Inspection data sheets
- Problem identification and corrective measure reports
- Block evaluation reports
- Photographic reporting data sheets

The Final RFI Report submitted to the EPA and MSDEQ will incorporate comments received on the Draft Final RFI Report.

The Project Management Plan consists of the following elements:

- Project task definition
- Specific personnel positions within the project organizational structure

## **5.1 PROJECT TASK DEFINITION**

VCC has retained the services of URSGWC to develop the RFI Work Plan. Following approval of these documents by EPA and MSDEQ, URSGWC will assist VCC in implementing the work plans.

## **5.2 PROJECT PERSONNEL**

Duties of key personnel are described below.

### **5.2.1 EPA and MSDEQ Project Coordinator**

The EPA and MSDEQ project coordinators or designated agents will observe work plan activities to any extent deemed necessary to confirm that the requirements of the Consent Decree, and the RFI Work Plan are met.

### **5.2.2 Project Director**

The Project Director is Mr. Steve Boswell. He is an employee of and is the official representative for VCC. He is in charge of administration of the work and the completion of the project.

### **5.2.3 URSGWC Project Manager**

The URSGWC Project Manger will develop the plans required by the Consent Decree and oversee work implementing the Work Plan on behalf of VCC, and will be the primary contact with VCC. The URSGWC Project Manager is Richard D. Karkkainen. Mr. Karkkainen is a Principal Environmental Engineer in URSGWC.

**5.2.4 URSGWC Field Investigation Site Coordinator**

The URSGWC Field Investigation Site Coordinator will handle day to day activities and coordinate them with other (RFI) activities. He will coordinate both efforts and oversee their implementation. The Project Manager is expected to fulfill this role.

**5.2.5 Health and Safety Officer**

A Health and Safety (H & S) officer will be responsible for the administration and implementation of the site Health and Safety for Groundwater Assessment activities. The H & S Officer will coordinate efforts through a Site Safety Officer. The Site Safety Officer will coordinate effort with the VCC safety personnel. The Project Manager may fulfill this role. A Health and Safety Plan is found in Appendix G. The H & S officer will have the overall responsibility for safety and health and will:

- Ensure that an employee medical surveillance program which meets the requirements of 29 CFR 1910.120 is instituted and maintained.
- Be responsible for the initial pre-construction indoctrination of all on-site personnel with regard to the H & S Plan and other safety requirements to be observed during the construction, including but not limited to:
  - potential hazards
  - personal hygiene principles
  - personnel protective equipment
  - respiratory protection equipment usage and fit testing, and
  - emergency response including site evacuation, dealing with fire and medical situations.
- Be responsible for the maintenance of separate exclusion, contamination reduction, and support zones as described in the Contractor's H & S Plan and on the drawings.
- Ensure that personnel exposure air monitoring, if needed, is properly conducted and recorded.

- If there is substantial on-site activity, maintain a recordkeeping system which will include daily records of all site activity, waste quantities produced, waste transportation activity information, laboratory results, and other information. During routine CAMU operation the VCC Project Director or his representative will carry out this function.

**5.2.6 QA/QC Manager**

The QA/QC Manager will be responsible for coordination with the analytical laboratory and for the validation of data.

**FIGURES**

**APPENDIX A**

**RFI QAP**

**APPENDIX B**  
**RFI DATA MANAGEMENT**

**APPENDIX C**  
**HEALTH AND SAFETY PLAN**

**APPENDIX D**  
**COMMUNITY RELATIONS**

**RCRA FACILITY INVESTIGATION  
WORKPLAN**

**VICKSBURG CHEMICAL COMPANY  
VICKSBURG, MISSISSIPPI**

Prepared for  
Vicksburg Chemical Company  
Vicksburg, Mississippi

June 1996

WCC File 92B007C-3003

**Woodward-Clyde** 

Woodward-Clyde Consultants  
2822 O'Neal Lane  
Baton Rouge, Louisiana 70816

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## LIST OF ACRONYMS

| <u>ACRONYM</u> | <u>MEAINING</u>   |
|----------------|---|
| CCC            | Cedar Chemical Corporation  |
| VCC            | Vicksburg Chemical Company  |
| RFI            | RCRA Facility Investigation                                       |
| RCRA           | Resource Conservation and Recovery Act                            |
| RFA            | RCRA Facility Assessment  |
| SWMU           | Solid Waste Management Unit                                       |
| AOC            | Area of Concern   |
| PECMT          | Preinvestigation - Evaluation of Corrective Measures Technologies |
| EPA            | United States Environmental Protection Agency                     |
| MSDEQ          | Mississippi Department of Environmental Quality                   |
| CMS            | Corrective Measures Study   |
| SWMU 1         | Hazardous Waste Container Storage Area                            |
| SWMU 17        | Off-specification Product Storage Area                            |
| SWMU 2         | Inactive Landfill will include AOC 4                              |
| SWMU 7         | Former Dinoseb Production Area                                    |
| SWMU 14        | Former Toxaphene Production Area                                  |
| SWMU 4         | Activated Carbon Treatment Unit                                   |
| SWMU 5         | South Plant Drainage System                                       |
| SWMU 8         | Dinoseb Loading/Unloading Area                                    |
| SWMU 9         | Dinoseb Drumming Area   |
| SWMU 11        | Former MSMA Production Area                                       |
| SWMU 12        | Former MSMA Unloading Area  |
| SWMU 13        | South Plant Drainage Ditches                                      |
| SWMU 15        | Former Methyl Parathion Production Area                           |
| SWMU 16        | Former Atrazine Production Area                                   |
| SWMU 17        | Returned Product Storage Area                                     |
| SWMU 18        | Former Blue Tank  |
| SWMU 20        | Railroad Car Loading/Unloading Station                            |
| SWMU 22        | North Plant Neutralization System Concrete Sump                   |
| SWMU 25        | North Plant Subsurface Wastewater Pipes                           |
| SWMU 29        | Floor under North Plan Oil Collection Unit                        |
| SWMU 30        | North Plant Waste Accumulation Area                               |
| SWMU 31        | North Plant No. 6 Fuel Oil Area                                   |
| bgs            | below ground surface  |
| TCL            | Toxic Compound List   |
| TAL            | Toxic Analyte List  |

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INTRODUCTION  
RFI STRATEGY, CHARACTERIZATION, SCHEDULE AND MANAGEMENT PLAN  
RFI DATA COLLECTION QUALITY ASSURANCE PLAN  
RFI DATA MANAGEMENT PLAN  
RFI HEALTH AND SAFETY PLAN  
RFI COMMUNITY RELATIONS PLAN

**INTRODUCTION**

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Vicksburg Chemical Company (VCC) and Cedar Chemical Corporation (Cedar) has retained Woodward-Clyde Consultants (WCC) to perform activities associated with a RCRA corrective action program. The corrective action program is in response to a Consent Decree. Cedar is the named party in the Consent Decree but VCC has undertaken by agreement with Cedar to comply with the provisions of the Consent Decree. The Consent Decree requires that a RCRA Facility Investigation (RFI) be conducted at VCC's manufacturing facility in Vicksburg, Mississippi .

The purpose of the RFI is to determine the nature and extent of releases of hazardous wastes and/or constituents from regulated units, solid waste management units (SWMUs), and other areas of concern (AOCs) at the facility and to gather all necessary data to support a Corrective Measures Study.

The RFI constitutes the second phase of the RCRA corrective action program. The program's initial phase consists of the RCRA Facility Assessment (RFA) which is conducted by EPA and precedes the RFI. The RFI itself is divided into five separate tasks which includes the Preliminary Report (previously submitted as a separate document and approved by the United States Environmental Protection Agency (EPA) and Mississippi Department of Environmental Quality), the RFI Workplan, the Facility Investigation, and the Investigative Analysis and Reports. In addition to the RFI, a Groundwater Assessment Workplan and Annual Groundwater Assessment Reports and a Preinvestigation - Evaluation of Corrective Measures Technologies (PECMT) Report are required by the Consent Decree.. The RFI workplan, and PECMT Report are due at the same time.

This document in total is the RFI Workplan and includes the following plans:

- RFI Strategy, Characterization, Schedule and Management Plan
- RFI Data Collection Quality Assurance Plan
- RFI Data Management Plan
- RFI Health and Safety Plan
- RFI Community Relations Plan

The RFI Strategy, Characterization, Schedule and Management Plan addresses in detail the objectives of the investigation and specifies the field investigation that is planned to obtain the information needed to meet the objectives. The RFI Data Quality Assurance Plan addresses in detail the sampling procedures, sample handling procedures and the requirements specified of the analytical laboratories. The Data Management Plan specifies how data obtained from the analytical laboratory is properly identified as to origin on the site, checked for appropriate interpretations by the laboratory and then organized in a useable format. The RFI Health and Safety Plan establish guidelines and requirements for the safety of field personnel. The RFI Community Relations Plan establishes the procedures by which the community can be informed and involved.

The RFI Workplan is guided by the information contained in the Amended and Supplemental Preliminary Report (February 1994 with November 1995 Revisions). The focus of the workplan is on those SWMUs and (AOCs) that were identified in the Preliminary Report as units requiring additional study. The additional investigation is required for SWMUs and AOCs identified in the Preliminary Report as units from which hazardous constituents may potentially have migrated. The SWMUs and AOCs are located on attached Figure 1. SWMU's and AOCs requiring RFI field investigation are:

| SWMU NUMBER                      | SWMU NAME   |
|----------------------------------|---|
| <b>MAJOR FIELD INVESTIGATION</b> |   |
| 1 and 17                         | Hazardous Waste Container Storage Area and Off-Specification Product Storage Area |
| 2                                | Inactive Landfill - will include AOC 4  |
| 7                                | Former Dinoseb Production Area - will include SWMU 20                             |
| 14                               | Former Toxaphene Production Area  |
| <b>MINOR FIELD INVESTIGATION</b> |   |
| 4                                | Activated Carbon Treatment Unit   |
| 5                                | South Plant Drainage System   |
| 8                                | Dinoseb Loading/Unloading Area  |
| 11                               | Former MSMA Production Area - will include SWMU 12 and SWMU 15                    |
| 13                               | South Plant Drainage Ditches  |
| 16                               | Former Atrazine Production Area   |
| 17                               | Returned Product Storage Area   |
| 18                               | Former Blue Tank  |
| 22                               | North Plant Neutralization System Concrete Sump                                   |
| 25                               | North Plant Subsurface Wastewater Pipes   |
| 29                               | Floor under North Plant Oil Collection Unit                                       |
| 30                               | North Plant Waste Accumulation Area   |
| 31                               | North Plant No. 6 Fuel Oil Area   |
| 34                               | Junkyards   |

SWMU 23 (Equalization/Neutralization Pond - also called the North Pond) was investigated in connection with the initial proposed site for a Potassium Carbonate Facility. The following were submitted to the EPA and MSDEQ in October 1994:

- North Pond RFI Field Investigation Work Plan
- Data Collection Quality Assurance Plan
- Data Management Plan
- Health and Safety Plan
- North Pond RCRA Facility Investigation Report, Volume 1 of 2
- North Pond RCRA Facility Investigation Report, Volume 2

The information obtained during the SWMU 23 investigation will be utilized in the RFI and will be represented in the Field Investigation Report which will summarize the results of field activities at all sources.

SWMU 9 (Dinoseb Drumming Area) and the production storage area associated with SWMU 16 (Former Atrazine Production Area) were investigated in conjunction with potential or current utilization of the areas for storage. The following were published:

- SWMU 9 - Former Dinoseb Drumming and Storage Area SWMU 16 - Former Production Storage Area RCRA Facility Investigation Workplan, August 1994
- SWMU 9 - Former Dinoseb Drumming and Storage Area SWMU 16 - Former Atrazine Production Storage Area RCRA Facility Investigation Report, October 1994

The information obtained during the investigation of SWMU 9 and a portion of SWMU 16 will be utilized in the RFI and will be represented in the Field Investigation Report which will summarize the results of field activities at all sources.

VCC will investigate SWMU 1 and SWMU 17 for purposes of closure in accordance with the plan and schedule set forth in the Closure Plan, SWMU 1 - Hazardous Waste Container Storage Area, SWMU 17 - Off-Specification Product Storage Area (February 1995 with

revisions November 1995). The schedule for sampling of SWMU 1 and SWMU 17 is triggered by the approval of the RFI workplan so that the field efforts for both programs (RFI and Closure) are coordinated. The Closure Plan has been approved by the EPA and MSDEQ.

In conjunction with the development of the RFI Workplan, a Preinvestigation Evaluation of Corrective Measure Technologies (PECMT) Report has been developed. The PECMT report identifies the potential corrective measures technologies that may be used onsite or offsite for the containment, treatment, remediation, and/or disposal of contamination. The PECMT report also identifies the field, laboratory, bench, or pilot scale data that needs to be collected during the field investigation to facilitate the evaluation and selection of the final corrective measure or measures. The PECMT Report is submitted as a separate document at the same time as the RFI workplan.

The RCRA Facility Investigation is intended to obtain information to characterize the nature and extent of releases of hazardous waste or constituents, if any. This information will be used to determine whether a Corrective Measures Study (CMS) will be necessary. The purpose of a CMS is to develop and evaluate the corrective action alternatives and to recommend the corrective measure or measures to be taken at the facility. The CMS will combine information obtained during RFI sampling and technology evaluated in the PECMT.

A Groundwater Assessment Workplan is also submitted at the same time as the RFI Workplan and the PECMT Report. The Groundwater Assessment Workplan defines and describes the Groundwater Assessment to be executed by VCC. The purpose of Groundwater Assessment is to evaluate the groundwater quality, monitoring system and program, as well as the abatement system at the facility.

The Groundwater Assessment program consists of the following tasks:

- Groundwater Assessment Workplan
- Implementation of the Workplan
- Annual Groundwater Assessment Reports

The Groundwater Assessment program activities are intended to be executed concurrently with the RFI. Data needed for Groundwater Assessment activities and requisite activities such as borings and well installations will be obtained during the RFI implementation programs. The Groundwater Assessment Workplan includes the following elements:

- number, location, depth of wells, and the rationale for the well placement
- construction logs for each monitoring well
- list of the monitoring parameters
- geologic cross-sections
- sampling and analytical methods for those hazardous wastes or hazardous constituents at the facility
- evaluation procedures, including any use of previously-gathered groundwater quality information
- schedule of implementation

**TABLE 1**  
**RFI WORKPLAN SUMMARY**

| <b>SWMU Number</b>  | <b>Sample Points</b> | <b>Samples<br/>(Soil or Concrete)</b> | <b>Analyte List</b> |
|---|----------------------|---------------------------------------|---------------------|
| 1/17  | 12                   | 34                                    | A                   |
| 2 - Landfill  | 10                   | 23                                    | B                   |
| 4 - Activated Carbon Treatment  | 6                    | 6                                     | B                   |
| 5 - South Plant Drainage  | 16                   | 16                                    | C                   |
| 7/20 - Former Dinoseb Production<br>Area/Railroad Car Loading/Unloading Station | 21                   | 42                                    | A                   |
| 8 - Dinoseb Loading/Unloading Area  | 2                    | 6                                     | A                   |
| 11/12/15 MSMA-Methyl Production Area  | 5                    | 13                                    | D                   |
| 13 - West Drainage  | 9                    | 9                                     | C                   |
| 14 - Toxaphene  | 3                    | 6                                     | C                   |
| 16 - Atrazine   | 5                    | 13                                    | C                   |
| 18 - Blue Tank  | 3                    | 3                                     | C                   |
| 30 - Waste Oil  | 3                    | 3                                     | E                   |
| 34 - Junkyard   | 6                    | 6                                     | F                   |

**LEGEND:**

- A Atrazine, cyanazine, arsenic, dinoseb, toxaphene, toluene
- B TCL, TAL, atrazine, cyanazine, dinoseb
- C Atrazine, cyanazine, arsenic, dinoseb, toxaphene
- D TLC, dioxin, TAL, atrazine, cyanazine, dinoseb
- E BTEX, TPH
- F BTEX, TPH, atrazine, cyanazine, arsenic, dinoseb, toxaphene

**TABLE 2**

**GROUNDWATER ASSESSMENT WORKPLAN**

|                            | <b>Samples (Groundwater)</b> | <b>Analyte List</b>                            |
|----------------------------|------------------------------|--|
| 3 New Wells in South Plant | 3                            | TCC, dioxin, TAL, atrazine, cyanazine, dinoseb |

**RFI STRATEGY, CHARACTERIZATION,  
SCHEDULE AND MANAGEMENT PLAN**

**VICKSBURG CHEMICAL COMPANY  
VICKSBURG, MISSISSIPPI**

Prepared for  
Vicksburg Chemical Company  
Vicksburg, Mississippi

June 1996

WCC File 92B007C-3003

**Woodward-Clyde** 

Woodward-Clyde Consultants  
2822 O'Neal Lane  
Baton Rouge, Louisiana 70816

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**RFI WORKPLAN STRATEGY**

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The Preliminary Report provides an overview of the investigations and analyses to date. These efforts were undertaken to characterize the potential contaminants of concern as well as the environmental setting and to determine those areas requiring additional investigation. *Completed work tasks include:*

- Compiled site background information
- Reviewed facility's history and file data
- Characterized the facility's environmental setting
- Established boundaries of SWMUs and AOCs
- Identified surface SWMUs not requiring further investigation
- Characterized waste sources to fullest extent possible
- Identified Potential Receptor Population

In conjunction with the submission of this RFI Workplan, a Groundwater Assessment Workplan is submitted for the same facility. Groundwater Assessment include the following:

- Development a Constituents of Concern List
- Investigation of leaking municipal potable waterline
- Characterization of hydrogeology conditions beneath South Plant
- Definition of uppermost aquifer
- Characterization of upgradient water properties

The RFI Workplan strategy in terms of objectives, and approach to meet the objectives are discussed in this section.

**1.1 RFI WORKPLAN OBJECTIVES**

The primary objectives for the RFI Workplan are to establish procedures for collecting information as necessary to provide for protection of human health and the environment. Specifically, these objectives are to:

- Identify specific constituents of concern for SWMUs requiring further investigation.
- Determine whether or not SWMUs in question are releasing hazardous constituents into the environment.
- Identify the source(s) of contamination if a release of hazardous constituents is occurring.
- Determine the horizontal and vertical extent of contamination.
- Evaluate migration rates, pathways, and potential receptors.
- Provide data for the evaluation of remedial alternatives and associated health risk assessments for the site.

These objectives will be obtained by implementing the RFI Workplan in total, and in particular the following:

- the Site Characterization of the RFI Strategy, Characterization, Schedule and Management Plan which describes sample locations
- the RFI Data Collection Quality Assurance Plan which describes how samples will be taken and the analyses performed, and
- the RFI Data Management Plan which describes how data will be handled and communicated.

## **1.2 RFI WORKPLAN RATIONALE**

The rationale which forms the basis for the RFI Workplan is based on VCC's present knowledge of the SWMUs requiring further investigation. It is known that the Inactive Landfill (SWMU 2) is associated with waste disposal practices. In addition, several former production areas have been identified as requiring further investigation based on current information as discussed in the Preliminary Report. SWMU 1 and SWMU 17 are investigated for purposes of closure. Each of these SWMUs requiring investigation is listed in the Introduction of the RFI Workplan.

The location of each SWMU is shown in Figure 1. SWMU boundaries were defined in the Preliminary Report. The environmental setting and potential receptors/pathways are generally understood and were presented in the Preliminary Report. The question of groundwater

contamination and plume migration is concurrently being studied in the Groundwater Assessment Program at the facility. New information to be gathered during the RFI includes the following:

- The vertical and horizontal extent of releases that have or are occurring within the SWMU boundaries which could potentially impact human health or the environment.
- The transport mechanisms, rates, and pathways for migration of hazardous constituents from SWMU areas.

For the former production areas, it is necessary to determine if hazardous constituents are migrating out of the SWMU area through surface water or groundwater. If there are indications of release, the vertical and horizontal extent of established constituents of concern will be assessed and data will be gathered to determine flow directions and pathways.

Storage areas will be approached from the standpoint that the hazardous constituents stored in the units are understood. The extent of contamination, if any, will therefore be assessed, followed by a study of migration rates, pathways, and potential receptors.

A phased approach for each SWMU area is discussed in Section 2.0, Site Characterization Plan.

SITE CHARACTERIZATION

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The overall approach for each SWMU requiring investigation will be designed to accomplish the objectives as stated in Section 1.1. The field investigation will be approached in specific phases with identified tasks for each phase.

2.1 PHASE 1 SAMPLING

The primary purpose of Phase I will be to determine if the SWMU is releasing hazardous constituents into the environment. The exception to this is the sampling at SWMU 1 and SWMU 17 which is done for purposes of closure. Phase I will involve specific field sampling, data assessment, and development of a field investigation report which summarizes the results of Phase I work.

After the results of Phase I are known it may be necessary to further delineate the extent of contamination in excess of action levels. The additional sampling and analysis is described in Section 2.3 Phase II Sampling.

Two background samples will be submitted for analysis in order to establish normal concentration ranges for elements in soils and for quality control. The background sample locations will be randomly taken from the borrow area to the north-northwest of the main administration building. The borrow area is not known to have been affected by plant operations. The background samples will be composited from four boreholes between 0 to 12 inches and four boreholes from 12 to 36 inches below present ground surface for comparison to samples taken from the SWMUs under investigation. The sample will be analyzed for all the Constituents of Concern noted in the discussions of the sampling at each SWMU.

The initial task involves the investigation and characterization of each SWMU. Field sampling will include shallow soil samples and or concrete samples. Details of sampling activities for each SWMU are listed below.

During implementation of the RFI, three new groundwater monitor wells will be installed pursuant to the Groundwater Assessment Workplan. The locations of the wells are noted on Figures 1 and 2.

**2.1.1 SWMU 1 - Hazardous Waste Container Storage Area and SWMU 17 - Off-Specification Product Storage Area**

SWMU 1 and SWMU 17 areas are no longer active storage areas and have no present useful purpose. A closure plan for SWMU 1 and SWMU 17 has been approved by the EPA and MSDEQ. VCC will notify EPA and MSDEQ at least 10 days prior to the date on which sampling of the facility is anticipated to commence. In order to coordinate the field program for the entire site, that date will be 30 days after approval by the EPA and MSDEQ of this RFI Workplan.

The SWMU 1 and SWMU 17 sampling is based on the fact that it is known which hazardous constituents were stored in or adjacent to the units. As a result of that knowledge, the soil and concrete samples submitted for analysis will be analyzed for atrazine, cyanazine, arsenic, dinoseb, toxaphene and toluene.

For each sample point there would be two or three samples taken:

- A sample of the concrete
- A composite sample of the first six inches of soil beneath the concrete referred to as the shallow sample
- A sample of soil generally 12 inches or deeper beneath the concrete referred to as the deep sample

SWMU 1 will have eight sample points and SWMU 17 will have four sample points.

The total number of samples to be submitted for analysis shall be, as a minimum, as follows:

| SWMU NUMBER | SOIL         | CONCRETE |
|-------------|--------------|----------|
| 1           | Concrete     | 4        |
|             | Shallow Soil | 8        |
|             | Deep Soil    | 8        |
| 17          | Concrete     | 2        |
|             | Shallow Soil | 4        |
|             | Deep Soil    | 4        |

**2.1.2 SWMU 2 - Inactive Landfill**

The Inactive Landfill will be investigated for a release of hazardous constituents into the soils and uppermost groundwater. During the initial phase, continuous sampling at a maximum of three locations as shown in Figure 1 will be performed until groundwater is reached at 90 to 100 feet measure level (msl). Two soil samples will be collected from each 5-foot increment. One sample will be stored on ice for possible delivery to the analytical laboratory. The second sample will be placed in a jar, covered with foil, sealed with a lid and kept at ambient temperature for a minimum of 15 minutes. Field "head space" analysis will be performed on the sample by inserting the HNu or OVA (photoionization or flame ionization device) into the jar and recording measurements. Samples with detectable volatile organic vapors will be eligible for analysis. If no "head space" readings are noted, two samples from each boring will be taken for verification and analysis in the laboratory. One sample will be taken from the 5-foot increment immediately above the uppermost groundwater zone and another will be taken from the initial 5-foot increment. An additional sample will be taken for analysis in the laboratory if "head space" readings are noted. As previously noted one sample will be taken from the 5-foot increment immediately above the uppermost groundwater zone and another taken from the initial 5-foot increment; additionally a sample will be taken that represents the 5-foot increment with the highest "head space" reading.

This sampling phase will determine the vertical extent of the contamination. The maximum horizontal extent of the contamination in the uppermost 30 feet is defined by the natural boundary of the landfill edge. Seven shallow (hand auger) borings will be taken in the

runoff area west of SWMU 2 and sloped toward the southwest to determine if, through surface water runoff and erosion, hazardous constituents have been released from SWMU 2 and the vertical and horizontal extent of that contamination. The hand auger borings will be 2 1/2 feet in depth. A sample will be obtained in the 6- to 12-inch below ground surface (bgs) elevation and the 24- to 30-inch bgs elevation.

The samples will be analyzed for the Toxic Compound List (TCL) and the Toxic Analyte List (TAL) plus atrazine, cyanazine and dinoseb. The TCL and TAL are found in Table 1 and Table 2.

The total number of samples to be submitted for analysis shall be as follows:

| <b>SWMU NUMBER</b> | <b>DESCRIPTION</b>             | <b>SOIL SAMPLES</b> |
|--------------------|--------------------------------|---------------------|
| 2                  | Top of Landfill<br>S.W. Runoff | 9<br>14             |

**2.1.3 SWMU 4 - Activated Carbon Treatment Unit**

The soil around the Activated Carbon Treatment Unit containment pad will be sampled. Six auger borings will be made to a depth of 12 inches. Samples will be taken from the 6- to 12-inch depth. These samples will be analyzed for TCL, TAL plus atrazine, cyanazine and dinoseb. Due to the proximity of the Former Dinoseb Production Area (SWMU 7) and Railroad Loading/Unloading Station (SWMU 20) to SWMU 4, Phase I sampling around the Carbon Treatment Units will be limited to the perimeter of the concrete pad.

**2.1.4 SWMU 5 - South Plant Drainage System**

The Phase I investigation will involve onsite discrete soil sampling and analysis for atrazine, cyanazine, arsenic, dinoseb and toxaphene at 200-foot intervals adjacent to the pipe. The samples will be taken in the 6-inch interval at the depth of the buried drainage pipes and conduits. For pipes on the ground surface, samples will be taken from a depth of 6 to 12 inches. Samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene. Sample locations are not located on Figure 1. The entire south plant drainage system is not

depicted on Figure 1 and is not available on a composite drawing. A summary of the samples is as follows:

| <b>SWMU NUMBER</b> | <b>DESCRIPTION</b>              | <b>NUMBER OF SAMPLES</b> |
|--------------------|---------------------------------|--------------------------|
| 5                  | From S. Rainwater Sump to Ponds | 6                        |
| 5                  | S. Drainage Loop                | 6                        |
| 5                  | N. Drainage Loop                | 4                        |

**2.1.5 SWMU 7 - Former Dinoseb Production Area (Includes SWMU 20 - Railroad Car Loading/Unloading Station)**

Two sets of samples will be taken during the Phase 1 investigation of the Former Dinoseb Production Area. One set of samples will be taken from 6 to 12 inches bgs and a second set of samples will be taken from 36 to 42 inches bgs. The samples will be taken 200 feet apart along each major section of the railroad track from south rainwater sump to the old Nitric Acid Plant. These samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

The soil beneath the area where the concrete pad which formed the foundation for the former production area will be sampled. Three samples for 6 to 12 inches bgs and three samples from 32 to 42 inches bgs will be taken. These samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

The total number of samples to be submitted for analysis shall be as follows:

| <b>SWMU NUMBER</b> | <b>DESCRIPTION</b>      | <b>NUMBER OF SAMPLES</b> |
|--------------------|-------------------------|--------------------------|
| 7                  | Railroad Area           | 36                       |
| 20                 | Dinoseb Production Area | 6                        |

**2.1.6 SWMU 8 - Dinoseb Loading/Unloading Area**

The Dinoseb Loading/Unloading Area (SWMU 8) is covered by a concrete pad. This pad contains sumps and drainage trenches. Two concrete samples will be taken. Four soil

samples will be taken below the concrete cores at depths from 6 to 12 inches bgs and also 18 to 24 inches bgs. The sampling locations are shown in Figure 1. The samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb, toxaphene and toluene.

The total number of samples to be submitted for analysis are as follows:

| SWMU NUMBER | DESCRIPTION  | NUMBER OF SAMPLES |
|-------------|--------------|-------------------|
| 8           | Concrete     | 2                 |
|             | Shallow Soil | 2                 |
|             | Deep Soil    | 2                 |

**2.1.7 SWMU 9 - Dinoseb Drumming Area**

The Dinoseb Drumming Area (SWMU 9) and a portion of SWMU 16 - Former Atrazine Production Area has previously been investigated. This description of the sampling effort is found in the document "SWMU 9 - Former Dinoseb Drumming and Storage Area SWMU 16 - Former Production Storage Area RCRA Facility Investigation Workplan" published in August 1994. In essence, 8 samples points were identified within SWMU 9 and 4 sample points were identified in SWMU 16. The sample points are located on the attached Figure 3. For each sample point, two or three samples were taken for analysis of atrazine, cyanazine, arsenic, dinoseb, toxaphene, benzene, ethylbenzene, toluene and xylene. The following is a summary of the sample taken:

| SWMU NUMBER | DESCRIPTION  | NUMBER OF SAMPLES |
|-------------|--------------|-------------------|
| 9           | Concrete     | 4                 |
|             | Shallow Soil | 8                 |
|             | Deep Soil    | 4                 |
| 16          | Concrete     | 2                 |
|             | Shallow Soil | 4                 |
|             | Deep Soil    | 4                 |

The results of the analyses of the samples are found in the document "SWMU 9 - Former Dinoseb Drumming and Storage Area SWMU 16 - Former Atrazine Production Storage Area RCRA Facility Investigation Report". The results will be utilized in the RFI and will be

represented in a Field Investigation Report which will summarize results of field activities at all the SWMUs.

**2.1.8 SWMU 11 - Former MSMA Production Area - will include SWMU 12 - Former MSMA Unloading Area and SWMU 15 - Former Methyl Parathion Production Area**

There will be two types of samples taken in these areas:

- three sample points will be established through concrete or pavement in the former production and unloading areas
- three sample points will be established in surrounding soil areas that could have been impacted by rainwater runoff

The sample points are shown on Figure 1. In the concrete or pavement areas, the concrete will be sampled and the soil beneath the concrete at 0 to 6 inches bgs and at 12 to 18 inches bgs will be sampled. In the soil areas a sample will be taken at 6 to 12 inches bgs and at 12 to 24 inches bgs.

The samples will be analyzed for TCL including dioxin, TAL, atrazine, cyanazine and dinoseb. A summary of the samples is as follows:

| <b>SWMU NUMBER</b> | <b>DESCRIPTION</b> | <b>NUMBER OF SAMPLES</b> |
|--------------------|--------------------|--------------------------|
| 11, 15 and 12      | Concrete           | 3                        |
|                    | Shallow Soil       | 3                        |
|                    | Deep Soil          | 3                        |
| 11, 15 and 12      | Shallow Soil       | 3                        |
|                    | Deep Soil          | 3                        |

**2.1.9 SWMU 13 - South Plant Drainage Ditches**

The investigation of the major South Plant Drainage Ditch will involve onsite discrete sediment sampling and analysis. Sediment samples will be taken from 6 to 12 inches in depth at 200 foot intervals along the drainage ditch. Samples will be taken from SWMU 34

(Junkyard) to the vicinity of the railroad track. Samples will be taken during the investigation. The sample points are depicted on Figure 1.

Samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

#### **2.1.10 SWMU 14 - Former Toxaphene Production Area**

The soil beneath the *Former Toxaphene Production Area* (SWMU 14) will be sampled. Areas adjacent to SWMU 14 will be sampled and analyzed under a similar sampling program for SWMU 7 (including SWMU 20). Three soil samples locations are established in the area. Three 6- to 12-inch bgs samples and three 36- to 42-inch bgs samples will be taken. These samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

#### **2.1.11 SWMU 16 - Former Atrazine Production Area**

The atrazine production storage area which is a portion of this area has been sampled and analyzed (see SWMU 9 discussion). The concrete pad which formed the foundation for the former production area will also be cored through and the soil beneath the pad sampled.

There will be two types of samples taken in the area:

- three sample points will be established through concrete in the production area
- two sampling points will be established in surrounding soil areas that could have been impacted by rainwater runoff

The sample points are shown on Figure 1. In the concrete areas, the concrete will be sampled and the soil beneath the concrete at 0 to 6 inches bgs and at 12 to 18 inches bgs will be sampled. In the soil areas a sample will be taken at 6 to 12 inches bgs and at 18 to 24 inches bgs.

The samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene. A summary of the samples is as follows:

| <b>SWMU NUMBER</b> | <b>DESCRIPTION</b> | <b>NUMBER OF SAMPLES</b> |
|--------------------|--------------------|--------------------------|
| 16                 | Concrete           | 3                        |
|                    | Shallow Soil       | 3                        |
|                    | Deep Soil          | 3                        |
| 16                 | Shallow Soil       | 2                        |
|                    | Deep Soil          | 2                        |

**2.1.12 SWMU 18 - Former Blue Tank**

Three soil surface samples will be taken in the location of the Former Blue Tank (SWMU 18). The samples will be taken from 6 to 12 inches in depth. The samples will be analyzed for atrazine, cyanazine, arsenic, dinoseb and toxaphene.

**2.1.13 SWMU 30 - North Plant Waste Oil Accumulation Area**

The North Plant Waste Oil Accumulation Area will be investigated for a release of hazardous constituents into the surface soils. Sampling at three locations will be performed to a depth of 6 to 12 inches bgs. Samples will be selected for benzene, ethylbenzene, toluene, xylene (BTEX) and total petroleum hydrocarbon (TPH) analysis.

**2.1.14 SWMU 34 - Surplus Equipment Storage (Junkyard)**

Each Surplus Equipment Storage area will be tested for soil contamination. Three surface samples from 6 to 12 inches bgs will be completed in both the North and South Plant junkyards. The samples will be analyzed for BTEX, TPH, atrazine, cyanazine, arsenic, dinoseb and toxaphene. A summary of the samples is as follows:

| <b>SWMU NUMBER</b> | <b>DESCRIPTION</b> | <b>NUMBER OF SAMPLES</b> |
|--------------------|--------------------|--------------------------|
| 34                 | South Junkyard     | 3                        |
|                    | North Junkyard     | 3                        |

## **2.2 EVALUATION OF DATA FROM PHASE I**

Upon completion of the field investigation of Phase I, the next step will involve the analysis of data collected. A summary of the number of samples for each SWMU and the parameters for analysis is presented as Table 3. A summary of the number of groundwater samples to be taken for the Groundwater Assessment and the parameters for analysis is presented as Table 4. The analysis will include the data collected previously in the SWMU 23 (North Pond) investigation and SWMU 9 (Dinoseb Drumming Area) investigation plus the investigation of the storage area associated with SWMU 16 (Atrazine Production Area). Methods, procedures and tools, detailed in the Data Management Plan, will be implemented to ascertain trends, constituents of concern, and possible indications of release.

The analysis of data will be summarized and presented to the EPA and MSDEQ in a Field Investigation report. The report will discuss the sampling and analytical results and present the data in a concise manner along with conclusions and recommendations. In the event that a release or potential release of established contaminants of concern is not indicated, the report could include recommendations for no further action. If a release is indicated, recommendations could include submittal of a Phase II sampling plan to fully determine the extent of contamination if sampling during Phase I was not sufficient.

## **2.3 PHASE II SAMPLING**

The data obtained in Phase I will be used to focus on specific areas within the SWMUs that are suspected or confirmed to have a release. The Phase I data will also identify those specific constituents of concern suspected or confirmed to have been released from each SWMU area.

If necessary, a separate Phase II plan will be prepared for specific SWMU areas and types of releases; however, the rationale is described herein. The primary objective of Phase II will be to establish the vertical and horizontal extent of contamination if it is not adequately established in Phase I. Sample locations, further identification of chemical parameters of concern, and a schedule of activities will be established prior to implementing any Phase II field investigation.

**2.4 EVALUATION OF DATA FROM PHASE II**

The data collected in Phase II will be analyzed and summarized in a supplemental Field Investigation Report to be presented to the EPA and MSDEQ. The report will discuss the source, nature, and extent of contamination in relation to the background levels indicative of the area.

**PROJECT SCHEDULE**

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**3.1 RFI FIELD INVESTIGATION WORKPLAN SCHEDULE**

A proposed RFI Field Investigation Workplan Schedule for conducting Phase I sampling is shown as Figure 4. This schedule shows milestones mandated by the Consent Decree as well as additional details for the planned activities on the site. The schedule may be revised after completion of initial samplings to reflect refinements in the project as a result of the data obtained. It must be emphasized that this schedule is highly dependent on a number of factors including changes in scope, unanticipated delays, or the size or magnitude of investigative areas and zones of concern.

The rationale, approach, and strategy for the RFI discussed above will be implemented in accordance with the attached Data Collection Quality Assurance Plan, Health and Safety Plan, and Data Management Plan. Minor changes in the procedures outlined in these plans will be documented and included in the interim reports. Significant changes which may affect data quality objectives will be subject to approval by EPA and MSDEQ.

Phase II sampling may not be required. If required, the Phase II sampling period will be highly dependent on the number of areas to be investigated. It is anticipated that a review meeting will be held with EPA and MSDEQ to discuss Phase II of the RFI prior to its implementation. Following this review meeting, a more detailed schedule for Phase II will be developed and presented with the Phase II plan.

**3.2 REPORTING REQUIREMENTS**

Several reports are mandated by the Consent Decree. Due dates for these reports are also mandated in the Consent Decree. The schedule presented in Figure 4 incorporates these required reports.

**3.2.1 Progress Reports**

Monthly progress reports dated the 15th of the month are being provided to EPA and MSDEQ containing:

- Description and estimate of the percentage of the RFI completed
- Summaries of all findings
- Summaries of all changes made in the RFI during the reporting period
- Summaries of all contacts with representatives of the local community, public interest groups, or State government during the reporting period
- Actions being taken to rectify problems
- Changes in personnel during the reporting period
- Projected work for the next reporting period
- Copies of daily reports, inspection reports, laboratory/monitoring data, etc.

**3.2.2 Interim RFI Field Investigation Reports**

The first report will be compiled at the conclusion of Phase 1. The report will include the following:

- Discussion of work accomplished to date
- Summary of findings
- Conclusions and recommendations
- Supporting analytical and field data

In addition, the first reports will include a discussion of QA/QC results, changes in project personnel and any new significant issues that would impact the RFI. It is anticipated that each report will have appropriate drawings, tables, figures, charts, bar graphs, maps, cross-sections, and other diagrams as needed to allow for a clear understanding of the nature and extent of any potential contaminations that may exist at the site.

**3.2.3 Draft Final RFI Report and Final RFI Reports**

At the completion of all of the phases of the RFI field investigation, a Draft Final RFI Implementation Report will be submitted to EPA and MSDEQ as required by the Consent Decree. The report will contain an analysis and summary of all facility investigations implemented. Additionally, the report will also identify and discuss applicable protection standards for groundwater. Finally, the report will include, when necessary, the following elements:

- Synopsis of the RFI field investigation
- Explanation of any modifications to the workplan and why these were necessary for the project
- Inspection summary reports
- Inspection data sheets
- Problem identification and corrective measure reports
- Block evaluation reports
- Photographic reporting data sheets

The Final RFI Report submitted to the EPA and MSDEQ will incorporate comments received on the Draft Final RFI Report.

**PROJECT MANAGEMENT PLAN**

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The Project Management Plan consists of the following elements:

- project task definition
- specific personnel positions within the project organizational structure

**4.1 PROJECT TASK DEFINITION**

VCC has retained the services of WCC to develop the RFI. Following approval of these document by EPA and MSDEQ, WCC will provide personnel to complete the field investigation phases of the RFI.

**4.2 PROJECT PERSONNEL**

Figure 5 is an organization chart depicting the administration of the RFI. Duties of key personnel are described below.

**4.2.1 EPA and MSDEQ Project Coordinator**

The EPA and MSDEQ project coordinators or designated agents will observe activities to confirm that the requirements of the Consent Decree, Administrative Order of Consent, and the Workplan are met.

**4.2.2 VCC Project Director**

The VCC Project Director is Steve Boswell and is the official representative for VCC. He is in charge of administration of the work and the completion of the project.

**4.2.3 WCC Project Manager**

The WCC Project Manager will develop the plans required by the Consent Decree and oversee work implementing the workplan on behalf of VCC, and will be the primary contact with VCC. The WCC Project Manager is Richard D. Karkkainen. Mr. Karkkainen is a Vice President and Principal in WCC.

**4.2.4 WCC RFI Field Investigation Site Coordinator**

The WCC RFI Field Investigation Site Coordinator will handle day to day workplan activities. He will coordinate efforts and oversee their implementation. The site coordinator will also oversee any verification testing and will maintain the on-site files.

**4.2.5 WCC Health and Safety Officer**

A WCC Health and Safety (H&S) officer will be responsible for the administration and implementation of site Health and Safety for workplan activities. The H&S officer will have the overall responsibility for safety and health and will:

- Ensure that an employee medical surveillance program which meets the requirements of 29 CFR 1910.120 is instituted and maintained.
- Be responsible for the initial pre-construction indoctrination of all on-site personnel with regard to the H&S Plan and other safety requirements to be observed during the construction, including but not limited to:
  - potential hazards,
  - personal hygiene principles,
  - personnel protective equipment,
  - respiratory protection equipment usage and fit testing, and
  - emergency response including site evacuation, dealing with fire and medical situations.

- Be responsible for the maintenance of separate exclusion, contamination reduction, and support zones as described in the Contractor's H&S Plan and on the drawings.
- Ensure that personnel exposure air monitoring is properly conducted and recorded.
- Maintain a record keeping system which will include daily records of all site activity, waste quantities produced, waste transportation activity information, laboratory results, and other information as required.

#### **4.2.6 QA/QC Manager**

The QA/QC Manager will be responsible for coordination with the analytical laboratory and for validation of data.

**TABLES**

**TABLE 1**  
**TARGET COMPOUND LIST (TCL) AND**  
**CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|                            | Quantitation Limits <sup>a</sup> |  |
|----------------------------|----------------------------------|--|
|                            | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| <b>Volatile Organics</b>   |                                  |  |
| Chloromethane              | 10                               | 10                                       |
| Bromomethane               | 10                               | 10                                       |
| Vinyl Chloride             | 10                               | 10                                       |
| Chloroethane               | 10                               | 10                                       |
| Methylene Chloride         | 5                                | 5  |
| Acetone                    | 10                               | 10                                       |
| Carbon Disulfide           | 5                                | 5  |
| 1,1-Dichloroethene         | 5                                | 5  |
| 1,1-Dichloroethane         | 5                                | 5  |
| 1,2-Dichloroethene (Total) | 5                                | 5  |
| Chloroform                 | 5                                | 5  |
| 1,2-Dichloroethane         | 5                                | 5  |
| 2-Butanone                 | 10                               | 10                                       |
| 1,1,1-Trichloroethane      | 5                                | 5  |
| Carbon Tetrachloride       | 5                                | 5  |
| Vinyl Acetate              | 10                               | 10                                       |
| Bromodichloromethane       | 5                                | 5  |
| 1,2-Dichloropropane        | 5                                | 5  |
| cis-1,3-Dichloropropane    | 5                                | 5  |
| Trichloroethene            | 5                                | 5  |
| Dibromochloromethane       | 5                                | 5  |
| 1,1,2-Trichloroethane      | 5                                | 5  |
| Benzene                    | 5                                | 5  |

TABLE 1 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|                              | Quantitation Limits <sup>a</sup> |  |
|------------------------------|----------------------------------|--|
|                              | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| trans-1,2-Dichloropropane    | 5                                | 5  |
| Bromoform                    | 5                                | 5  |
| 4-Methyl-2-pentanone         | 10                               | 10                                       |
| 2-hexanone                   | 10                               | 10                                       |
| Tetrachloroethene            | 5                                | 5  |
| Toluene                      | 5                                | 5  |
| 1,1,2,2-Tetrachloroethane    | 5                                | 5  |
| Chlorobenzene                | 5                                | 5  |
| Ethyl Benzene                | 5                                | 5  |
| Styrene                      | 5                                | 5  |
| Xylenes (Total)              | 5                                | 5  |
| <b>Semivolatile Organics</b> |                                  |  |
| Phenol                       | 10                               | 330                                      |
| bis-2-Chlorophenol           | 10                               | 330                                      |
| 2-Chlorophenol               | 10                               | 330                                      |
| 1,3-Dichlorobenzene          | 10                               | 330                                      |
| 1,4-Dichlorobenzene          | 10                               | 330                                      |
| Benzyl Alcohol               | 10                               | 330                                      |
| 1,2-Dichlorobenzene          | 10                               | 330                                      |
| 2-Methylphenol               | 10                               | 330                                      |
| bis(2-Chloroisopropyl)ether  | 10                               | 330                                      |
| 4-Methylphenol               | 10                               | 330                                      |
| N-Nitro-di-n-dipropylamine   | 10                               | 330                                      |
| Hexachloroethane             | 10                               | 330                                      |

TABLE 1 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|  | Quantitation Limits <sup>a</sup> |  |
|--|----------------------------------|--|
|  | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| Nitrobenzene                                     | 10                               | 330                                      |
| Isophorone                                       | 10                               | 330                                      |
| 2-Nitrophenol                                    | 10                               | 330                                      |
| 2,4-Dimethylphenol                               | 10                               | 330                                      |
| Benzoic Acid                                     | 50                               | 1600                                     |
| bis(2-Chloroethoxy)methane                       | 10                               | 330                                      |
| 2,4-Dichlorophenol                               | 10                               | 330                                      |
| 1,2,4-Trichlorobenzene                           | 10                               | 330                                      |
| Naphthalene                                      | 10                               | 330                                      |
| 4-Chloroaniline                                  | 10                               | 330                                      |
| Hexachlorobutadiene                              | 10                               | 330                                      |
| 4-Chloro-3-methylphenol(para-chloro-meta-cresol) | 10                               | 330                                      |
| 2-Methylnaphthalene                              | 10                               | 330                                      |
| Hexachlorocyclopentadiene                        | 10                               | 330                                      |
| 2,4,6-Trichlorophenol                            | 10                               | 330                                      |
| 2,4,5-Trichlorophenol                            | 50                               | 1600                                     |
| 2-Chloronaphthalene                              | 10                               | 330                                      |
| 2-Nitroaniline                                   | 50                               | 1600                                     |
| Dimethylphthalate                                | 10                               | 330                                      |
| Acenaphthylene                                   | 10                               | 330                                      |
| 2,6-Dinitrotoluene                               | 10                               | 330                                      |
| 3-Nitroaniline                                   | 50                               | 1600                                     |
| Acenaphthene                                     | 10                               | 330                                      |
| 2,4-Dinorophenol                                 | 50                               | 1600                                     |

TABLE 1 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|                             | Quantitation Limits <sup>a</sup> |  |
|-----------------------------|----------------------------------|--|
|                             | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| 4-Nitrophenol               | 50                               | 1600                                     |
| Dibenzofuran                | 10                               | 330                                      |
| 2,4-Dinitrotoluene          | 10                               | 330                                      |
| Diethylphthalate            | 10                               | 330                                      |
| 4-Chlorophenyl-phenyl-ether | 10                               | 330                                      |
| Fluorene                    | 10                               | 330                                      |
| 4-Nitroaniline              | 50                               | 1600                                     |
| 4,6-Dinitro-2-methylphenol  | 50                               | 1600                                     |
| N-Nitrosodiphenylamine      | 10                               | 330                                      |
| 4-Bromophenyl-phenylether   | 10                               | 330                                      |
| Hexachlorobenzene           | 10                               | 330                                      |
| Pentachlorophenol           | 50                               | 1600                                     |
| Anthracene                  | 10                               | 330                                      |
| Di-n-butylphthalate         | 10                               | 330                                      |
| Fluoranthene                | 10                               | 330                                      |
| Pyrene                      | 10                               | 330                                      |
| Butyl Benzyl Phthalate      | 10                               | 330                                      |
| 3,3'-Dichlorobenzidine      | 20                               | 660                                      |
| Benzo(a)anthracene          | 10                               | 330                                      |
| Chrysene                    | 10                               | 330                                      |
| bis(20Ethylhexyl)phthalate  | 10                               | 330                                      |
| Di-n-octylphthalate         | 10                               | 330                                      |
| Benzo-(b)fluoranthene       | 10                               | 330                                      |
| Benzo-(k)fluoranthene       | 10                               | 330                                      |

TABLE 1 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|                       | Quantitation Limits <sup>a</sup> |  |
|-----------------------|----------------------------------|--|
|                       | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| Benzo(a)pyrene        | 10                               | 330                                      |
| Ideno(1,2,3-cd)pyrene | 10                               | 330                                      |
| Dibenz(a,h)anthracene | 10                               | 330                                      |
| Benzo(g,h,i)perylene  | 10                               | 330                                      |
| <b>Pesticide/PCBs</b> |                                  |  |
| alpha-BHC             | 0.05                             | 8.0                                      |
| beta-BH               | 0.05                             | 8.0                                      |
| delta-BHC             | 0.05                             | 8.0                                      |
| gamma-BHC             | 0.05                             | 8.0                                      |
| Heptachlor            | 0.05                             | 8.0                                      |
| Aldrin                | 0.05                             | 8.0                                      |
| Heptachlor Epoxide    | 0.05                             | 8.0                                      |
| Endosulfan I          | 0.05                             | 8.0                                      |
| 4,4'-DDE              | 0.10                             | 16.0                                     |
| Endrin                | 0.10                             | 16.0                                     |
| Endosulfan II         | 0.10                             | 16.0                                     |
| 4,4'DDD               | 0.10                             | 16.0                                     |
| Endosulfan Sulfate    | 0.10                             | 16.0                                     |
| 4,4'-DDT              | 0.10                             | 16.0                                     |
| Methoxychlor          | 0.05                             | 80.0                                     |
| Endrin ketone         | 0.10                             | 16.0                                     |
| alpha-Chlordane       | 0.05                             | 80.0                                     |
| gamma-Chlordane       | 0.05                             | 80.0                                     |
| Toxaphene             | 1.0                              | 160.0                                    |

TABLE 1 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|              | Quantitation Limits <sup>a</sup> |  |
|--------------|----------------------------------|--|
|              | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| Aroclor-1242 | 0.5                              | 80.0                                     |
| Aroclor-1248 | 0.5                              | 80.0                                     |
| Aroclor-1061 | 0.5                              | 80.0                                     |
| Aroclor-1221 | 0.5                              | 80.0                                     |
| Aroclor-1232 | 0.5                              | 80.0                                     |
| Aroclor-1254 | 1.0                              | 160.0                                    |
| Aroclor-1260 | 1.0                              | 160.0                                    |

## NOTES:

- <sup>a</sup> Quantitation limits listed for soil/sediment are based on wet weight. The quantitation limits calculated by the laboratory for soil/sediment, calculated on dry weight basis as required by the contract, will be higher.
- <sup>b</sup> Medium Soil/Sediment Contract Required Quantitation Limits (CRQL) for Volatile TCL Compounds are 125 times the individual Low Soil/Sediment CRDL.
- \* Specific quantitation limits are highly matrix dependent. The quantitation limits listed herein are provided for guidance and may not always be achievable.

SOURCE: Statement of Work for Organic Analysis Multi-Media Multi-Concentration SOW 2/88, Revisions 9/88, 4/89 and 5/89, Office of Solid Waste and Emergency Response, U.S. Environmental Agency, Washington, D.C., May 1989.

**TABLE 2**  
**TARGET ANALYTE LIST (TAL) INORGANICS**

| Analyte   | Contract Required Detection Limits*<br>( $\mu\text{g/l}$ ) |
|-----------|--|
| Aluminum  | 200  |
| Antimony  | 60   |
| Arsenic   | 10   |
| Barium    | 200  |
| Beryllium | 5  |
| Cadmium   | 5  |
| Calcium   | 5000   |
| Chromium  | 10   |
| Cobalt    | 50   |
| Copper    | 25   |
| Iron      | 100  |
| Lead      | 3  |
| Magnesium | 5000   |
| Manganese | 15   |
| Mercury   | 0.2  |
| Nickel    | 40   |
| Potassium | 5000   |
| Selenium  | 5  |
| Silver    | 10   |
| Sodium    | 5000   |
| Thallium  | 10   |
| Vanadium  | 50   |
| Zinc      | 20   |
| Cyanide   | 10   |

## NOTE:

- \* The reporting limits are instrument detection limits obtained in pure water. The detection limits for samples may be considerably higher depending on the sample matrix.

SOURCE: Statement of Work for Inorganic Analysis Multi-Media Multi-Concentration SOW No. 788, Revisions 2/89 and 6/89, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency

**TABLE 3**  
**RFI WORKPLAN SAMPLE SUMMARY**

| SWMU Number   | Sample Points | Samples<br>(Soil or Concrete) | Analyte List |
|---|---------------|-------------------------------|--------------|
| 1/17  | 12            | 34                            | A            |
| 2 - Landfill  | 10            | 23                            | B            |
| 4 - Activated Carbon Treatment  | 6             | 6                             | B            |
| 5 - South Plant Drainage  | 16            | 16                            | C            |
| 7/20 - Former Dinoseb Production<br>Area/Railroad Car Loading/Unloading Station | 21            | 42                            | A            |
| 8 - Dinoseb Loading/Unloading Area  | 2             | 6                             | A            |
| 11/12/15 MSMA-Methyl Production Area  | 5             | 15                            | D            |
| 13 - West Drainage  | 9             | 9                             | C            |
| 14 - Toxaphene  | 3             | 6                             | C            |
| 16 - Atrazine   | 5             | 13                            | C            |
| 18 - Blue Tank  | 3             | 3                             | C            |
| 30 - Waste Oil  | 3             | 3                             | E            |
| 34 - Junkyard   | 6             | 6                             | F            |

**LEGEND:**

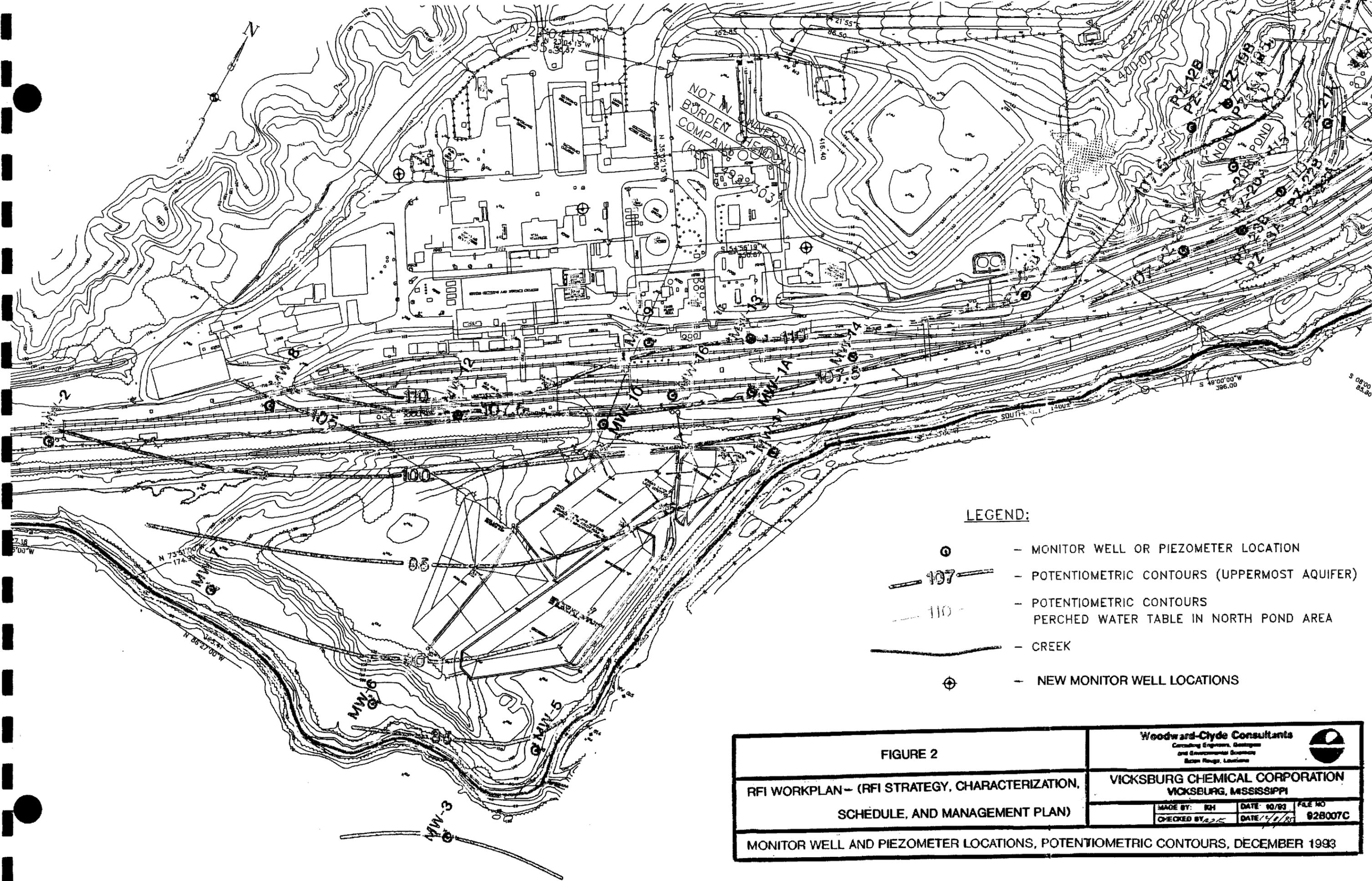
- A Atrazine, cyanazine, arsenic, dinoseb, toxaphene, toluene
- B TCL, TAL, atrazine, cyanazine, dinoseb
- C Atrazine, cyanazine, arsenic, dinoseb, toxaphene
- D TCl, dioxin, TAL, atrazine, cyanazine, dinoseb
- E BTEX, TPH
- F BTEX, TPH, atrazine, cyanazine, arsenic, dinoseb, toxaphene

**TABLE 4**

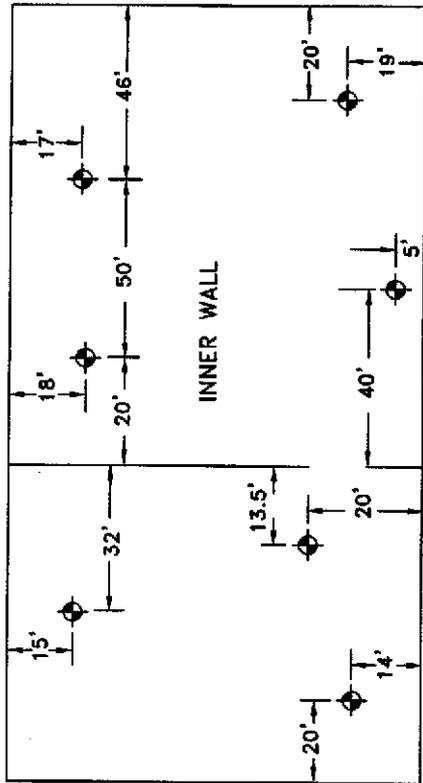
**GROUNDWATER ASSESSMENT WORKPLAN SAMPLE SUMMARY  
(IMPLEMENTED CONCURRENTLY WITH RFI)**

|                            | <b>Samples (Groundwater)</b> | <b>Analyte List</b>                            |
|----------------------------|------------------------------|--|
| 3 New Wells in South Plant | 3                            | TCL, dioxin, TAL, atrazine, cyanazine, dinoseb |

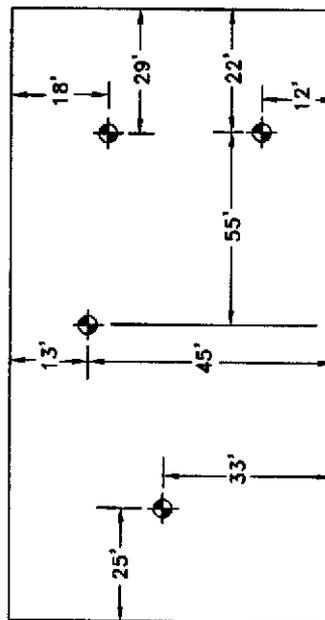
**FIGURES**



|   |   |   |              |             |          |                 |             |         |
|---|---|---|--------------|-------------|----------|-----------------|-------------|---------|
| <p>FIGURE 2</p> <p>RFI WORKPLAN - (RFI STRATEGY, CHARACTERIZATION, SCHEDULE, AND MANAGEMENT PLAN)</p> | <p>Woodward-Clyde Consultants<br/>         Consulting Engineers, Geologists<br/>         and Environmental Scientists<br/>         Baton Rouge, Louisiana</p> |   |              |             |          |                 |             |         |
|   | <p>VICKSBURG CHEMICAL CORPORATION<br/>         VICKSBURG, MISSISSIPPI</p>   |   |              |             |          |                 |             |         |
| <p>MONITOR WELL AND PIEZOMETER LOCATIONS, POTENTIOMETRIC CONTOURS, DECEMBER 1993</p>                  |   | <table border="1"> <tr> <td>MADE BY: RCH</td> <td>DATE: 10/93</td> <td>FILE NO:</td> </tr> <tr> <td>CHECKED BY: RCH</td> <td>DATE: 10/93</td> <td>928007C</td> </tr> </table> | MADE BY: RCH | DATE: 10/93 | FILE NO: | CHECKED BY: RCH | DATE: 10/93 | 928007C |
| MADE BY: RCH  | DATE: 10/93   | FILE NO:  |              |             |          |                 |             |         |
| CHECKED BY: RCH   | DATE: 10/93   | 928007C   |              |             |          |                 |             |         |



SWMU 9  
DINOSEB DRUMMING AND STORAGE



SWMU 16  
ATRAZINE WAREHOUSE

Location: B.R., LA File name: K:\DRWG\MCKSBUR\2B007C05.DWG Last edited: 07/12/94 @ 08:45

VICKSBURG CHEMICAL  
COMPANY

**Woodward-Clyde Consultants**  
Consulting Engineers, Geologists  
and Environmental Scientists  
Baton Rouge, Louisiana



SAMPLING LOCATIONS  
SWMU 9 - FORMER  
DINOSEB DRUMMING  
AND STORAGE AREA  
SWMU 16 - FORMER  
PRODUCTION STORAGE  
AREA; AUGUST 1994

FILE NO.

92B007C

FIG. NO.

3

SCALE:  
NTS

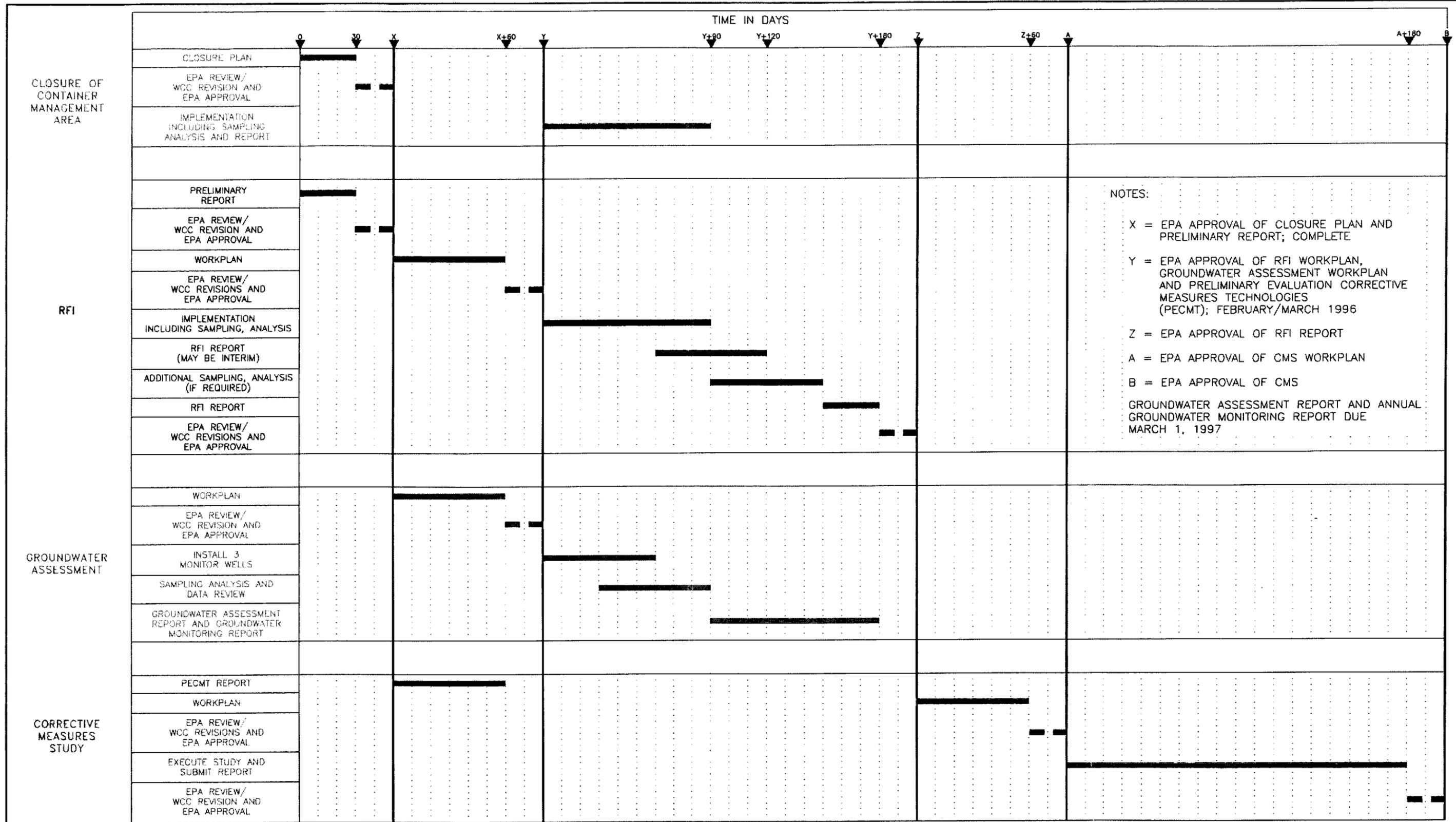
DRAWN BY: G. THORNTON

DATE: 7/94

CHKD. BY: *[Signature]*

DATE:

K: \CAD-61S\CEDAR\92B0075 Wed Nov 29 16:32:20 1995



| REV | DESCRIPTION OF REVISION | BY | DATE |
|-----|-------------------------|----|------|
| △   |                         |    |      |
| △   |                         |    |      |
| △   |                         |    |      |
| △   |                         |    |      |
| △   |                         |    |      |
| △   |                         |    |      |

**VICKSBURG CHEMICAL COMPANY**  
VICKSBURG, MISSISSIPPI

**Woodward-Clyde Consultants**  
Engineering & sciences applied to the earth & its environment  
2822 O'Neal Lane  
Baton Rouge, Louisiana 70816

|               |                    |
|---------------|--------------------|
| SCALE         | NONE               |
| DESIGNED      | RDK                |
| DRAWN         | GAT                |
| CHECKED       | <i>[Signature]</i> |
| PEER REVIEWED |                    |
| DATE          | 11/29/95           |

PROJECT SCHEDULE

PROJECT: 92B007C

FIGURE: 4

**RFI DATA COLLECTION  
QUALITY ASSURANCE PLAN**

**VICKSBURG CHEMICAL COMPANY  
VICKSBURG, MISSISSIPPI**

Prepared for  
Vicksburg Chemical Company  
Vicksburg, Mississippi

June 1996

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**Woodward-Clyde** 

Woodward-Clyde Consultants  
2822 O'Neal Lane  
Baton Rouge, Louisiana 70816

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**INTRODUCTION**

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The Vicksburg Chemical Corporation manufacturing facility (VCC) is located in Vicksburg, Mississippi. The facility is a manufacturer of chemicals. An U.S. Environmental Protection Agency (EPA) Determination of Release was issued for the facility in December, 1989. Negotiations for a Consent Decree began in January, 1990.

VCC has retained Woodward-Clyde Consultants (WCC) to perform a RCRA Facility Investigation (RFI) at the Vicksburg facility. WCC will conduct the investigation in compliance with the guidelines of the Consent Decree. Among the requirements and/or guidelines included in the decree are procedures to control the quality of data acquired during the investigation. This document presents the overall approach that WCC will undertake to verify that the information, data, and procured results meet the quality objectives. A detailed discussion of sampling procedures and methodologies for specific media is also given. For information on the description and background of the RFI for the entire facility, refer to the Preliminary Report.

**DATA COLLECTION OBJECTIVES**

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**2.1 DATA OBJECTIVES**

The primary objectives of the North Pond RFI are as follows:

- Identify or verify the contaminants of concern for each SWMU requiring further investigation.
- Determine whether or not the SWMU's in question are releasing hazardous constituents into the environment.
- Identify the source of contamination
- Determine vertical and horizontal extent of contamination.
- Collect data to be used in determining the necessity and feasibility of corrective action measures.

To meet the overall objectives of the investigation, WCC will collect subsurface soil and groundwater samples. The following sections present the data requirements and strategy for collection of samples from each media.

**2.2 QUALITY ASSURANCE OBJECTIVES**

The objectives of the Quality Assurance/Quality Control (QA/QC) procedures are to produce data that meet (or exceed) the requirements of standard analytical methods and satisfies the project requirements. The objectives of the QA efforts for this project are as follows:

- To provide the mechanism for ongoing control and evaluation of the quality of data measurement throughout the project.
- Utilizing quality control data to define data quality for various measurement parameters in terms of precision and accuracy.
- To verify that all chemical samples are accurately and precisely collected, analyzed and documented so that proper treatment and/or disposal of waste material can occur.

- To verify compliance with the Department of Transportation and other agency requirements.
- To verify that samples are properly collected, analyzed and documented to provide data as part of the H&S Plan.

### **2.2.1 Definitions of Quality Assurance Terms**

Definitions of precision, accuracy, completeness, representativeness, and comparability are presented in Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans (QAMS-0050/80, Office of Monitoring Systems and Quality Assurance and Office of research and Development, U.S. Environmental Protection Agency, Washington, D.C. 20460, December 29, 1980).

#### **2.2.1.1 Precision**

Precision is "a measure of mutual agreement among individual measurements of the same property. It is a measure of variability of individual sample measurements. Precision will be assessed from the laboratory duplicate analyses of field samples and from the set of duplicate matrix spiked samples. Precision will be measured as the percent difference in the duplicate measurements.

Average precision and its standard deviation of the concentration data for individual parameters will be used to evaluate the data collected and its acceptability for the objectives of the sampling. Data to be used in evaluation will meet the criteria defined in this QAP. Confidence intervals will be derived for data sets using standard statistical methods.

#### **2.2.1.2 Accuracy**

Accuracy is "the degree of agreement of a measurement with an accepted reference or true value" and is a measure of a system bias. Bias is the difference between the mean of the true sample values and the mean of the laboratory analysis. Accuracy will be assessed using laboratory spiked standard matrix samples in conjunction with field and trip blank samples and laboratory method and reagent blanks. Average accuracy and its standard deviation of

the concentration data will be used if sufficient data are collected for a specific sampling activity.

**2.2.1.3 Completeness**

Completeness is "a measure of the amount of the valid data obtained from a measurement system compared to the amount that was expected to be obtained under normal conditions." The completeness of data objectives reflect the degree to which required samples specified in the appropriate sampling plan have been collected and the necessary analysis performed, in order to create a sufficient data base to meet the objectives. If the completeness objective is not met, an evaluation will be undertaken to determine if resampling is required to provide adequate data to meet specific task objectives.

**2.2.1.4 Representativeness**

Representativeness "expresses the degree to which data accurately and precisely represent a characteristic of a population, parameter variations at a sampling point, a process condition, or an environmental condition." Representativeness is a function of the sample site selection and sample collection and analysis techniques. The objective of this program is to obtain samples which are representative of the media to be measured. The rationale of the selection of sample sites is provided in the project plans (including this QAP).

**2.2.1.5 Comparability**

Comparability "expresses the confidence with which one set of data can be compared with another." Comparability can be related to precision and accuracy since these quantities are measures of data reliability. Qualitatively, data subjected to strict QA/QC procedures will be deemed more reliable than data obtained from another project or previous study. To maintain comparability, the sampling method used, chain-of-custody procedures, EPA analytical methods and qualified laboratories and establishment of strict QA procedures and sampling guidelines provide the basis for uniformity in all data collection and analysis activities.

**2.2.2 Accuracy, Precision, and Sensitivity of Laboratory Analysis**

The QA objective with respect to accuracy, precision, and sensitivity of laboratory analytical data is to achieve the QC acceptance criteria of the analytical protocols.

During the RFI field work there will be analyses performed for constituents of concern from the following list:

Parameter or group of parameters:

- A. Atrazine, cyanazine, arsenic, dinoseb, toxaphene, toluene
- B. TCL, TAL, atrazine, cyanazine, dinoseb
- C. Atrazine, cyanazine
- D. TCL, dioxin, TAL, atrazine, cyanazine, dinoseb
- E. BTEX, TPH
- F. BTEX, TPH, atrazine, cyanazine, arsenic, dinoseb, toxaphene

A table listing the SWMU Number, number of samples to be taken and the analytical parameter or group of parameters is presented as Table 1 for the RFI Workplan and Table 2 from the Groundwater Assessment Workplan.

A summary of the parameter and possible methods to be employed by the offsite laboratory are as follows:

| <u>Parameter</u>                  | <u>Protocol</u>   |
|-----------------------------------|---|
| Toxaphene, Atrazine and Cyanazine | EPA SW-846, Method 8080   |
| Dinitrobutyl Phenol (Dinoseb)     | EPA SW-846, Preparation Method 3550, Analysis Method 8015   |
| Arsenic                           | EPA SW-846, Method 7060   |
| Toluene                           | EPA SW-846, Method 8020   |
| TAL, Dioxin (See Table 3)         | <u>Statement of Work for Organic Analysis Multi-Media Multi-Concentration</u> , SOW 2/88, Revision 9/88, 4/89, and 5/89, Office of Solid Waste and Emergency Response, U.S. EPA, Washington, D.C., May 1989 |

| Parameter         | Protocol   |
|-------------------|--|
| TAL (See Table 4) | <u>Statement of Work for Inorganic Analysis Multi-Media Multi-Concentration</u> , Sow No 788, Revisions 2/89 and 6/89, Office of Solid Waste and Emergency Response, U.S. EPA, Washington, D.C., June 1989 |

The TCL parameters and contract required quantitation limits are listed in Table 3. The detection limits for metals analyses in accordance with SW-846, 3rd Edition are presented on Table 4. Accuracy and precision criteria for the parameters to be tested in accordance with EPA CLP protocols and SW-846 is shown in Table 5. The accuracy and precision of laboratory analyses for samples tested in accordance with CLP and SW-846 protocols will be determined by testing of laboratory blanks, duplicates, and spiked samples in accordance with the frequencies shown in Table 6. Compounds that are often used as matrix and surrogate spikes for CLP and SW-846 organic analyses, and their control limits from CLP Protocols, are included in Tables 7, 8 and 9.

### 2.2.3 Quality of Field Samples

Field duplicates, rinsate blanks, trip blanks, and matrix spikes/matrix spike duplicates will be taken in the field and submitted to the analytical laboratory to provide a means to assess the quality of the data resulting from field investigation tasks. Field duplicate samples will be analyzed to check for sampling and analytical reproducibility. Field and trip blank samples will be analyzed to check for procedural contamination and cross-contamination during shipment and storage of samples. Matrix spike/matrix spike duplicate samples will be analyzed to verify that recoveries falling outside acceptance windows are attributable to sample matrix interferences and not to laboratory analytical errors.

Field duplicates for groundwater will be obtained at the frequencies indicated in Table 10. The samples will consist of obtaining a duplicate sample set for analysis from the sample. Rinsate samples will be prepared by rinsing decontaminated equipment with deionized water and collecting the rinsate sample. Matrix spike and matrix spike duplicates will be collected in the field but they will be spiked in the laboratory. Trip blanks will be prepared by the

laboratory and shipped with the sample containers. The trip blanks will be kept with collected samples and shipped back to the laboratory for analysis.

#### **2.2.4 Accuracy of Field Measurements**

Measurement data will be generated in many field activities that are incidental to collecting samples for analytical testing or unrelated to sampling. These activities include, but are not limited to, the following:

- Documenting time and weather conditions
- Determining depths in a borehole or piezometer and static water levels
- Measuring pH and conductivity of ground water samples
- Screening samples with an organic vapor analyzer (OVA) or photoionization detector (PID)

The general QA objective for such measurement data is to obtain reproducible and comparable measurements to a degree of accuracy consistent with the intended use of such data through the documented use of standard procedures.

The QC level of effort for the field measurement of pH consists of pre-measurement calibration and post-measurement verification using two standard reference solutions each time to sample pH. This procedure will be performed for each sample tested. The QC effort for field conductivity measurements will include daily calibration of the instrument using standard solutions of known conductivity.

The accuracy of field measurements of pH will be assessed through pre-measurement calibrations and pH-measurements verifications using at least two standard buffer solutions. The two measurements must each be within  $\pm 0.1$  standard unit of buffer solution values. If measurements not within  $\pm 0.1$ , the problem will be evaluated. A fresh portion of buffer solution will be utilized. If the problem persists, a different (new) buffer solution will be used. Precision will be assessed through replicate measurements. (The electrode will be withdrawn, rinsed and de-ionized water and re-immersed between each replicate). The instrument used will be capable of providing measurements to 0.1 standard unit. A total of four replicates for pH and conductivity will be performed.

The accuracy of measuring depths (for boreholes and static water levels) will be assessed by using a measuring device (weighted tape or electronic water level indicator such as an M-scope) that has been calibrated before use by measuring two known lengths. Any measurements taken with the device will be adjusted by the difference (if any) in length over the appropriate depth interval. At least three replicate depth measurements will be made and the average depth measurement will be used.

The data from the OVA or PID is used for screening only to select samples for analysis. After receiving laboratory data the OVA or PID and lab data will be evaluated for comparability.

**SAMPLING OBJECTIVES**

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The specific objectives of the collection of the data are further discussed in the subsequent paragraphs.

**3.1 GROUNDWATER SAMPLING DATA OBJECTIVES**

As stated in the Preliminary Report water-bearing zones have been identified in previous investigations. Additional groundwater data may be needed to characterize these zones if contamination is found. Groundwater data needed could include:

- Approximate vertical boundaries of zones and stratigraphic relationships.
- Basic flow characteristics of each zone (direction, lateral flow rate, hydraulic conductivity, transmissivity and storage capacity).
- Hydraulic inter-relationships of the zones (vertical interconnection transmissivity between zones, etc).
- Effect of stratigraphic variations within each zone on contaminant transport.
- Nature and extent of contamination in each zone (approximate boundaries of contaminant accumulation).

Identification of water-bearing zone boundaries and relevant soil strata will required a detailed description of soil features (such as color, lithology, bedding, identifying features and relative degree of water saturation) to a depth sufficient to identify the base of the deepest contaminated water-bearing zone. The description will require accuracy to the nearest foot and professional geologic judgment to recognize and describe pertinent features.

The zones to be monitored will require sufficient screening intervals to characterize each zone. For low density immiscible contaminants (floaters), the screen will extend approximately two feet above the top of the zone to provide for fluctuations in water levels. If dense non aqueous phase contaminants are the concern (sinkers) the screen will cover the base of the upper pervious zones and extend slightly below the base of the zone ( $\pm$  6 inches).

If dissolved constituents are the concern, the screened interval will correspond to that portion of the zone which is judged to have the highest hydraulic conductivity. If required, deeper zones will be monitored utilizing similar approaches as describe above.

Determination of groundwater flow direction will require measurement of elevations of the top of the piezometric surface of each zone. A sufficient number and spacing of measurement stations will be installed to construct idealized contours of the piezometric surface elevations. The locations of measuring stations will be established such that they can be plotted on a site location map. Locations should be to the nearest 0.1 foot. Water level measurements should be made to the nearest 0.01 foot accuracy and reported in feet mean sea level (MSL). This data will be evaluated to verify the designated upgradient shallow well location and to identify upgradient background wells. As additional samplings are performed, the data will be reevaluated to verify results of previous sampling.

Determination of the nature and extent of groundwater contamination will require sampling and chemical analysis of groundwater from each water-bearing zone. A sufficient number of samples will be required to identify approximate lateral limits of contamination and establish and nature and concentrations of contaminants. Investigation of zones below the upper pervious zone will be performed if data does not define the vertical extent of groundwater contamination. The sample will require analysis for parameters noted in Table 2.

### **3.2 AQUIFER TESTING OBJECTIVES**

Determination of lateral and vertical flow rates, hydraulic conductivities, transmissivities, storage capacities and vertical interconnection will require in situ flow testing data. Lateral hydraulic conductivity/transmissivity data should be collected by at least two different methods in order to evaluate the credibility of the data and subsequent calculations. Storage capacity calculations and vertical interconnection determinations should be based on field pumping test data. Aquifer testing will be done in conjunction with detailed design of corrective action, if required.

**3.3 SURFACE SOIL SAMPLING DATA OBJECTIVES**

The primary purpose of collecting surface soil data is to aid in determining potential for contamination of site runoff-water, potential for off-site migration of contaminated sediments (water transported) and/or potential for human/animal contact and/or ingestion. Consequently, sampling need not extend beyond about 12 inches below the natural ground surface. Background samples at 0 to 12 inches to 12 to 36 inches will be obtained in the site vicinity. The background sample locations are selected based upon the lack of hazardous waste activities in those areas. Laboratory analysis for contaminant content for each SWMU shall consist of those parameters listed in Table 1.

**3.4 SUBSURFACE SOIL SAMPLING DATA OBJECTIVES**

The primary purpose of collecting subsurface soil (vadose zone) and soil structure data is to aid in determining the potential for downward percolation of contaminants into the shallow groundwater. Consequently sampling must be of sufficient quantity to identify lateral limits of contamination and must extent to a sufficient depth of identify and quantify accumulation of contaminants above and within the first occurring water-bearing zone. The data shall consist of laboratory analyses of the contaminated soil. Laboratory analyses for each SWMU shall consist of analysis for those parameters listed in Table 1.

**3.5 SAMPLING ACTIVITIES**

The sampling activities will occur during the RFI to address the data objectives for the media of concern identified above. A map of the site is presented as Figure 1 of the RFI Strategy, Characterization, Schedule and Management Plan and sampling locations are presented on the Figure. The field investigation tasks to obtain the data will generally consist of the following:

- Obtaining sampling location characteristic information from topographic and information surveys.
- Obtaining background and current groundwater quality data from the existing site monitor wells (already completed).

- Subsurface soil sampling to evaluate the vertical and horizontal extent of contamination and constituents if released.
- Groundwater assessment and sampling (installation of three wells, sampling and evaluation) pursuant to the Groundwater Assessment Workplan.

**SAMPLING EQUIPMENT, PROCEDURES, AND MEASUREMENTS**

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The sampling locations, depths, type (grab vs. composite), number of samples, and analytical parameters were discussed in the RFI Work Plan. The procedures and equipment to perform the sampling for the RFI were discussed only in general terms in that document and are presented in more detail herein. In addition, procedures for piezometer or monitor well installation and aquifer testing are presented. The sampling procedures presented below will be implemented as appropriate. Changes in the procedures discussed here in will be documented. Additional specifications with respect to documentation, equipment, and procedures as required by VCC standard policies and manuals which do not affect data quality objectives may be incorporated into the work plan as appropriate.

**4.1 SUBSURFACE SOIL SAMPLING**

Subsurface soil sampling will be performed to characterize the wastes and to evaluate the extent of subsurface soil contamination, if any. The equipment and methods are discussed below.

**4.1.1 Equipment**

Subsurface sampling will be performed by rotary auger or hollow-stem drilling methods or use of "Geoprobe" soil boring equipment. The drilling apparatus will consist of a truck-mounted drilling rig. Samples will be obtained by drilling using a 3-inch diameter Shelby tube, or 2-inch diameter split spoon sampler.

"Geoprobe" soil boring equipment is typically mounted on the rear of a pickup truck or on the rear of an all terrain vehicle. The "Geoprobe" system uses the direct-push method to hydraulically advance small diameter hollow steel probe rods to the desired sampling depth. The probe rods are typically one or three feet in length and 1 to 2 inches in diameter. The soil boring can be sampled continuously or can be advanced to a desired depth to collect discrete soil and/or groundwater samples. The working depth for the system is dependent upon subsurface conditions and is typically about 30 feet below ground surface (bgs).

Only petroleum jelly, teflon tape, lithium grease, or vegetable-based lubricants shall be used on the threads of downhole drilling equipment. Additives containing lead or copper shall not be used. Any hydraulic or other fluids used in the drilling rig, pumps, or other field equipment/vehicles shall not contain any polychlorinated biphenyls (PCBs).

If antifreeze is added to any pump, hose, etc., in an area in contact with drilling fluids, this antifreeze shall be completely purged prior to the equipment's use in drilling, mud mixing, or any other part of the overall drilling operation. Only antifreeze without rust inhibitors and/or sealants may be used.

Drilling equipment that has a visible loss of grease, hydraulic fluids, oils, fuels and/or transmission oil to drilling fluids to the borehole will not be allowed for borings and/or well installation until the problem is corrected.

Hydraulic rotary drilling operations will use portable recirculation tanks/pans for the "mud pit" and for mixing grout. Dug pits or sumps will not be used.

#### **4.1.2 Procedure**

The borings shall be continuously sampled with a thin-walled Shelby tube sampler or split-spoon sampler, extruded in the field and described or logged, following the guidelines of the appropriate and most current American Society for Testing and Materials (ASTM) Standards:

- D 1452 Practice for Soil Investigation and Sampling by Auger Borings,
- D 1586 Method for Penetration Test and Split-Barrel Sampling of Soils,
- D 1587 Practice for Thin-Walled Tube Sampling of Soils,
- D 2487 Test Method for Classification of Soils for Engineering Purposes, and
- D 2488 Practice for Description and Identification of Soils (Visual-Manual Procedure).

All borings shall be sampled and described by a qualified WCC representative. The qualified WCC representative is to be on-site during all boring and sampling operations. Samples taken from borings will be handled as described later in this section.

All soil borings will be advanced with rotary or hollow-stem drilling techniques with continuous soil sampling techniques unless it is determined to be unnecessary for strata identification and sample collection by the qualified WCC representative based on consistent site conditions. If the borehole becomes unstable and caving or sloughing of the walls develop, temporary surface casing may be used in the drilling operations. Dry rotary auger or hollow-stem techniques will utilize an auger and cut and clear the borehole for sampling. Rotary wash will utilize potable water that is recirculated through the borehole to remove cuttings. Bentonite drilling mud (organic free) will be used only if required to maintain borehole stability.

The samples obtained from the borings will be screened in the field for head-space analysis using an on-site OVA or PID. Immediately upon removal of the soil sample from the Shelby tube or split spoon, the field geologist will visually log it. The visual logging will describe soil type and secondary color, penetration resistance and inclusions as described above. A portion of the sample will then be shaved with a clean knife or spatula to remove at a minimum the outer approximately one-fourth inch which may have come in contact with the downhole fluids. This shaved sample will then be divided into two parts, each of which will be labeled based on boring number and sample depth. One portion of the sample will be placed in a glass jar, labeled, and placed on ice. The other portion will be placed in a wide mouth glass jar covered with aluminum foil and capped. The headspace will be sampled by inserting the probe of the OVA into a predrilled hole in the cap through the aluminum foil. The OVA or PID reading will be made immediately and the reading recorded on the boring log.

Based on the OVA or PID readings or visible contamination or the RFI Strategy, Characterization, Schedule and Management Plan, the qualified WCC representative will select samples for chemical analysis to consist of parameters for each SWMU listed in Table 1 or monitoring well listed in Table 2. Samples will be retained on ice or refrigerated until delivery to the laboratory. One sample in 20 will be split to provide field duplicate samples for analysis and one rinsate blank will be collected for analysis from each drilling rig decontamination during drilling.

Shallow rotary borings will be drilled to the water table and will be advanced by dry-auger methods until free water is encountered. For borings drilled for shallow piezometer

installation, drilling operations will be stopped for ten minutes when water is encountered to allow the water level to rise. Both the initial and second water level will be measured and recorded. Borings drilled for shallow piezometer installation will be drilled to the base of the first water-bearing zone encountered.

As an alternative, subsurface soil samples may be collected from discrete intervals or continuously by soil probe sampling with a "Geoprobe" sampler. The sample tools are stainless steel thin wall sample tubes or split spoon samplers. The sampling tools are typically 1- to 2-foot in length and 1 1/2 to 2 inches in diameter. Different types of "Geoprobe" samplers are also available.

The soil probe uses a direct-push method that consists of a small diameter hollow steel rod with a stainless steel sampling tool fitted to the base of the rod. The borehole can be continuously sampled or a discrete sample can be collected at a desired sample interval. Soil samples are collected by pushing or driving the sampler to the desired sampling depth. The drive tip is then mechanically released and the thin wall sample tube or split spoon sampler is pushed into the soil at the base of the borehole. The sampler uses a plastic polybutyrate liner which is extruded upon retrieval of the sampler from the borehole.

The soil samples will be handled in the same manner as described previously. The sampling devices and probe rods will be decontaminated prior to each use in the same manner as described for other sampling equipment described in the RFI Data Collection Quality Assurance Plan.

#### **4.1.3 Documentation**

Subsurface soil sampling will be documented in the filed log book as well as on a boring log form for each boring drilled. The boring log will be of a form equal to or similar to Figure 5. Pertinent information will, at a minimum, include boring number, date, logger, lithologic description, core recover, OVA or HNu readings, depth of water table and boring completion data.

The following information shall be routinely entered or attached to the soil boring log:

- Depths/heights shall be recorded in feet and fractions thereof (tenths).
- Soil classifications shall be in accordance with the Unified Soil Classification System (equivalent to ASTM D 2487 and 2488).
- Soil classifications which have been prepared in the field at the time of sampling by a WCC representative and are subject to change based upon laboratory tests and/or subsequent review. Factors to consider before changing a field determination include the expertise of the field geologist and laboratory personnel, representative character of the tested sample, labeling errors, etc.

Each soil sample taken shall be fully described in the log. The descriptions of intact samples shall include the following parameters:

- Lithologic Classification and Unified Soil Classification
- Color
- Plasticity
- Consistency (cohesive soil)
- Density (noncohesive soil)
- Moisture Content. Use relative term.

Other information to be placed on the soil boring logs, as appropriate, include:

- The drilling equipment used will be generally described either on each log or in a general legend.
- Each log will record the drilling sequence.
- All special problems and their resolution will be recorded on the log; e.g., hole caving, recurring problems at a particular depth, sudden tool drops, excessive grout takes, drilling fluid losses, unrecovered tools in hole, lost casing, etc.
- The dates for the start and completion of borings shall be recorded on the log.

- Each sequential boundary between the various soils and individual lithologies shall be noted on the log by depth. When depths are estimated, the estimated range shall be noted along the boundary.
- The depth of first encountered free water shall be indicated along with the method of determination. In addition, when free water is first encountered the following procedure will be followed; Allow the first encountered water to partially stabilize (10 to 15 minutes) and record this secondary level and time between measurements before proceeding.
- The estimated depth interval for each soil sample taken, classified, and/or retained shall be noted on the log. For each driven (split spoon), thin wall (shelby), and cored sample, the length of sample recovery and the sampler type and size (diameter and length) will be recorded.
- For thin wall samplers it should be indicated whether the sampler was pushed or driven. Blow counts shall be recorded in half foot increments when standard (1 3/8" ID by 2" OD) samplers are used. For penetration of less than a half foot, it will be noted in the log along with the blow count and the distance over which the count was taken.
- Special abbreviations used on a soil boring log and/or well diagram will be defined either in the log/diagram where used, or in a general legend.

## **4.2 SURFACE SOIL**

Soil samples will be obtained from areas that are potential pathways for surficial contaminant migration.

### **4.2.1 Equipment**

Sampling equipment will consist of hand sampling tools such as trowels, shovels, a drive tube sampler or a hand auger. Stainless steel or PVC sampling tools will be used.

### **4.2.2 Procedure**

The sample locations will be referenced to site coordinates. The sampling area will be first cleared of vegetation and/or debris. The sample will be collected to a depth of 12 inches

such that minimal volatilization is allowed and then transferred in the appropriate container. The hole will be backfilled with native soils and vegetation.

#### **4.2.3 Documentation**

As previously stated, the sampling point will be referenced to the site coordinate system and, if taken with an areal grid, the node number will be recorded. Visual classification and other observations will also be noted in the field log book along with sample number, time, date, and other pertinent information.

### **4.3 GROUNDWATER SAMPLING**

#### **4.3.1 Water Level Measurement**

##### **4.3.1.1 Water Level Determination**

The elevation at the top of the casing (TOC) should be established at each piezometer. This information will be used to determine the water level elevation. To calculate the water level elevation, the distance to the water level from the TOC needs to be measured. This can be achieved by either of the following procedures:

**4.3.1.1.1 Weighted Tape Procedure.** A weighted tape must be decontaminated prior to use and between wells by procedures detailed in Standard Operating Procedures (SOP) 3.5. The weight should consist of an inert, open-ended object that will create a distinct sound when tapped on the water's surface. The weight should be lowered gently into the well until it is heard to have touched the water. The water level measurement from top of casing to water level should be determined to the  $\pm 0.01$  foot and recorded in a logbook. A measurement of well depth from the top of the casing to the bottom of the well should also be made. This measurement can be used to determine if a significant silt build-up has occurred at the bottom of the well or that the well casing is not blocked. NOTE: When using a weighted tape, be sure that the weight is not secured using an adhesive tape (duct tape, strapping tape, etc.) as the adhesive may contain organic compounds which could contaminate the well.

**4.3.1.1.2 Electronic Water Level Indicator Procedure.** An electronic water level indicator must also be decontaminated prior to use and between wells. The indicator probe, connected to a graduated wire is lowered down the well casing. A light turning on or a meter deflection occurs when the electrical circuit is closed indicating that the probe tip has touched the water. The reading should be taken to the nearest 0.01 foot by recording the length of graduated wire between the TOC and the water level (probe tip) in a logbook. Additionally, a measurement of well depth should be made from TOC to the bottom of the well using the probe.

**4.3.1.2 Cross-Contamination Minimization**

In areas of known contamination, the sequence of water level measurement should be done, whenever possible, from the well least likely to be contaminated to the well most likely contaminated to reduce the potential for cross-contamination. If this information is not available, an attempt should be made to sample upgradient wells first and then downgradient wells.

**4.3.1.3 Calculation of the Volume of Standing Water**

The water level measurement is used to calculate the volume of standing water in the well from the linear feet of standing water and the well diameter. This calculation is then used to determine the volume of water to be purged from the well prior to sampling. To calculate the linear feet of water in the well, subtract the depth to the water from the total depth of the well. Form the table below determine the appropriate factor for the specific well inside diameter; multiply the linear feet by the appropriate factor listed on the table below to get the gallons of water present in the well.

| Casing Diameter | Casing Volume      |
|-----------------|--------------------|
| 2 inches        | 0.163 gallons/foot |
| 3 inches        | 0.367 gallons/foot |
| 4 inches        | 0.653 gallons/foot |

For example, if depth to water is 7.5 feet, and the total depth of the 2-inch diameter well is 20 feet, then 12.5 feet of standing water is in the well. Volumetrically,  $0.163 \times 12.5$  (2-inch well), or 2.04 gallons of standing water are in the well.

#### 4.3.1.4 Free-Phase Immiscible Contamination

If contamination of groundwater by free-phase immiscible chemicals is suspected, procedures for the detection of immiscible, or nonaqueous phase liquids (NAPL) should be employed. The presence of dense NAPL (heavier than water) or light NAPL (less dense than water) can be determined by the use of an electrical interface probe. The probe should be carefully and slowly lowered into the well. A deflection of the needle on the scale of the probe will indicate the air/light NAPL interface, light NAPL/water interface, and water/dense NAPL interface, respectively. The thickness of immiscible contaminants is to be recorded in a logbook.

#### 4.3.2 Well Evacuation - Purging

In order to obtain a representative sample of groundwater, the standing water in the well casing should be purged or evacuated. Evacuation allows fresh or formation groundwater to enter the well. The optimum method to ensure that formation water is sampled, is to monitor the water being purged by field measurements of pH, temperature and conductivity. For each volume of standing water purged from the well (as calculated earlier) a measurement of these three indicator parameters should be taken. When the subsequent sample are observed to have less than  $\pm 10$  percent variation in these parameters, the well is presumed to be adequately flushed. At a minimum, three standing water volumes as should be removed; however, in wells with very low recoveries this goal may not be practical. When full recovery exceeds two hours, the well should be purged to dryness. If the well is evacuated to dryness, samples of the groundwater should be collected within 24 hours of evacuation.

Evacuation rates should be kept well below 10 gallons per minute and in most cases should be below 5 gallons per minute. At no time should a well be pumped to dryness if recharge rates cause groundwater to vigorously cascade down the sides of the screen which can potentially cause an accelerated loss of volatiles. If at all possible, the water should be

drawn down from above the screen in the uppermost part of the water column in high yield formation to ensure that fresh water from the formation will move upward in the screen. In low yield formations, water should be purged so that it is removed from the bottom of the screen.

Evacuation of a well can be accomplished in several different ways. In any instance it is paramount to ensure that the evacuation procedure does not cause cross-contamination from one well to the next. Therefore, the preferred method employs dedicated equipment whenever possible. The selection of an evacuation method often relies on the depth of the water in the well, as discussed below. The following are potential evacuation methods:

#### **4.3.2.1 Bailer Purging**

Bailers can be used to evacuate shallow wells, and through there are no prohibitive factors preventing their use in deeper wells, the time required and physical strain on the individual purging the well makes hand bailing a less desirable evacuation method for deeper wells. Ideally, if a bailer is used, it is dedicated to one well and often remains hanging from the well cap in the well between use. Regardless of whether the bailer is dedicated or not, it should be decontaminated before use. Decontamination procedures should be followed.

The preferable materials of bailer construction are teflon, stainless steel, polypropylene, polyethylene, vitron, and polyvinyl chloride (PVC). The bailer should be lowered into the well using a nonporous rope made out of material such as polypropylene or teflon-coated cord. Caution should be used when lowering the bailer into the water so as to avoid aeration of the well water. Retrieve the bailer after it is filled and pour water into a graduated container to measure the amount of water removed from the well. Care should be taken to keep the rope and bailer from touching the ground or other potentially contaminated surfaces. When the first standing water volume has been removed, a groundwater sample should be collected from the bailer for field measurements of pH, temperature, and conductivity. These field measurements should be repeated for each subsequent standing water volume removed.

#### **4.3.2.2 Mechanical Pump Purging**

Suction lift pumps such as centrifugal, diaphragm, or peristaltic pumps can be used to evacuate wells if the static water level is within 25 feet of ground surface. These pumps are utilized at ground surface with the intake line connected to dedicated teflon or high-density polyethylene tubing inserted into the well. The tubing should be equipped with a foot valve to avoid having aerated water from the pump fall back in the well. The outlet tubing should be placed so that the purge water is collected in a graduated container, and can be measured. Deionized water should be used if priming is necessary. Measurements of pH, conductivity, and temperature should be taken for each standing water volume evacuated from the well. If the well is pumped dry and the recharge rate is sufficiently rapid to cause water to cascade into the well, the well should be allowed to recover. Then the pumping rate should be adjusted to a slower rate and the well re-evacuated of two standing water volumes before sampling.

#### **4.3.2.3 Submersible Pump Purging**

Portable submersible pumps are an option for evacuating wells with water levels greater than 25 feet below land surface. One such pump is an electrically powered (110 or 230 V AC) centrifugal pump with an isolated motor. Another is an air displacement pump in which a stainless steel reservoir with check valves at each end alternately fills from the bottom with water from the well, and evacuates when air or compressed gas (nitrogen) is discharged into the reservoir from the top. The decontaminated pump should be carefully lowered into the well, trailing a discharge hose, electrical cables or air liens, and a stainless steel security cable (which should bear most of the weight). If these items are to be bundled, use plastic ties and not electrical tape or duct tape.

If the pump is connected to a portable gasoline generator or air compressor, the generator should be placed some distance away from the well where fumes can not affect sample quality. An inline air filtration system at the discharge line should be used when an air compressor is used in conjunction with an air displacement pump. The submersible pump provides the advantage of high flow rates, however, care should be taken when operating to keep the flow rate within an acceptable limit for the particular well yield (recharge capacity).

As with the suction lift pumps, these pumps should be equipped with a foot valve and fitted with dedicated tubing.

To evacuate, simply turn the pump on, prime with de-ionized water if needed, and measure the outlet water quantities. As with all other evacuation methods, pH, temperature, and conductivity should be measured for each standing water volume removed. These pumps need to be decontaminated prior to sampling and between sampling points.

#### **4.3.2.4 Bladder Pump Purging**

A bladder pump or gas squeeze pump consists of a housing that encloses a flexible membrane (bladder) that has check valves above and below. The pump is connected to either bottled gas or an air compressor. When in operation, water enters the membrane/bladder through the bottom check valve; compressed gas is injected into cavity between the housing and the bladder, squeezing the bladder and forcing the water through the top check valve and ultimately out of the well. Another type of bladder pump is also available that works on the same principle except that the water enters the chamber between the membrane and the casing, and the gas is injected into bladder. Similar to the submersible pumps, the bladder pump should be carefully lowered into the well by a security cable. In low-yielding wells (i.e., wells incapable of producing three well volumes), the bladder pump should be placed at the bottom of the well screen so that water is removed from the bottom of the well screen.

The outlet tubing from the bladder pump should be placed so that purge water can be collected into a graduated container. Field measurements of temperature, pH, and conductivity should be taken for each standing water volume evacuated from the well.

#### **4.3.2.5 Inertia Pump Purging**

An inertia pump consists of a PTFE footing which is essentially a reservoir with check valves at the bottom inlet and top outlet, and a tube rising to the wellhead. An up-and-down movement of the tube pumps water through inertia derived from the upward movement of water with each stroke. The whole system is dedicated and can be pumped by hand, by the use of a hand-operated lever, or by using an electrically powered (110 V AC) motor. An

optional bellows attachment provides suction to the tubing and greatly increases the pumping capacity.

To evacuate, simply pump by hand, or connect the motor. If a portable generator is used, take care to place it some distance away from the well where fumes cannot affect sample quality. Field measurements of pH, temperature, and specific conductivity should be taken for each standing water volume removed.

### **4.3.3 Well Sampling**

After evacuation of an adequate volume of water from the piezometer sampling can begin. Sampling of the piezometer should occur as soon as possible after evacuation, preferably immediately and must occur within 24 hours of completion of purging activities. Of the methodologies used for monitor well evacuation it is recommended that samples be collected only by using either the bailer, inertia pump, or the bladder pump. Due to the manner in which the other pumps (suction lift and submersible pumps) operate and the potential effect on the quality of the samples, it is not advisable to collect samples for volatile organic analysis with them.

#### **4.3.3.1 Sample Collection**

Prior to collecting the groundwater samples, the appropriate sample containers and preservatives should be set out and readily available for sample collection. Ideally, the sample containers should be cleaned and prepared by the laboratory that is going to conduct the analysis. Some of the parameters for which samples are to be collected will require a preservative.

The monitor well cap of each well will be removed carefully to avoid the incorporation of any contaminants in the well. Any plants or small trees that will be close to the well will also be removed, if possible. Prior to sampling, the initial static water elevation will be measured and recorded. The water level will be measured from the top of the riser piper to the nearest 0.01 foot using a calibrated electronic probe water level sensor (M-scope) or weighted tape (with sounder). Three replicate measurements will be made to verify accuracy. The probe or tape will be cleaned with deionized water after each use.

Following water level measurements, the well will be purged to remove stagnant water which would otherwise bias a representative sample. The purging will be performed using a dedicated bailer. The well will be purged until water parameters of pH, specific conductance, and temperature have stabilized and at least three well volumes or the well is purged to dryness. Purged water will be containerized for treatment. Measurements of pH, specific conductance, and temperature will be taken and recorded during the purging.

Vehicles or any other equipment that might be a potential source of contamination will be placed at a distance far enough from the wells during purging or sampling.

After purging, the well will be sampled with a dedicated or clean bailer. Clean plastic sheeting will be placed on the ground around each well to prevent contamination of the ground or any sampling equipment which is dropped. Care will be taken so that the sample is taken from the screened interval of the well. Samples will be retained in appropriately preserved laboratory containers. No head space will be allowed in VOA vials.

Samples will be collected and containerized in the order of the parameters volatilization sensitivity. Samples for organic compounds should be collected initially. Care will be taken not to allow the bailer to come into contact with the container while pouring the samples.

The following are potential sampling methods:

**4.3.3.1.1 Bailer Sample Collection.** If a bailer is used for sample collecting, the same bailer used to purge the well may be used to sample it. An effort will be made to keep the rope from touching the ground or the casing. The bailer will be lowered slowly into the water. Do not let the bailer free fall into the water. Attempt to lower the bailer to the same depth in the well each time. Retrieve the bailer smoothly but quickly and empty the water into the sample container in a steady stream. Samples should be collected in the following order: Volatile Organics, Total Organic Carbon, Semivolatile Organics, and any other compounds. Once collected, the samples should be labeled using a waterproof label and waterproof ink, sealed in plastic bags, and placed on ice in an ice chest and cooled to 4°C. The sample number, amount collected, and time collected should be recorded on a chain-of-custody form and in a logbook.

**4.3.3.1.2 Bladder or Inertia Pump Sample Collection.** If a bladder pump or an inertia pump is used, the same tubing that was used to purge the well may be used to sample it. The samples should be collected in the following order: Volatile Organics, Total Organic Carbon, Semivolatile Organics, and any other compounds. When collecting samples for the analysis of volatile compounds, the pumping rate should not exceed 100 milliliters per minute. After these samples are collected the pumping rate can be increased for collection of other samples. Once collected, the samples should be labeled using a waterproof label and waterproof ink, sealed in plastic bags, and placed on ice in an ice chest cooled to 4°C. The sample number, amount collected, and time collected should be recorded on a chain-of-custody form and in a logbook.

**4.3.3.2 Cross-Contamination Minimization**

As with purging, the sequence of monitor well sampling should be done, whenever possible, from the well least likely to be contaminated to the well most likely contaminated to reduce the potential for cross-contamination. If this information is not available, an attempt should be made to sample upgradient wells first and then downgradient wells.

**4.3.3.3 Collection for Metal Analysis**

If analysis for metals is required, water samples that contain high concentrations of sediment may be field filtered before the sample is collected for metal analysis. A hand pump and a filter device can be used, or an in-line filter (0.45 micron) in conjunction with the bladder or inertia pump. The groundwater sample should be run through the filter and collected in a clean sample container. It is recommended that a second sample should be sent to the laboratory for analysis. All equipment should be decontaminated before filtering and between sampling locations.

**4.3.3.4 Use of Dedicated Equipment**

If possible, the equipment used to sample a well should be dedicated equipment. If a bailer is used, each well should have a dedicated bailer that is stored in the well. Another alternative which is preferred over nondedicated sampling equipment is a disposable bailer which may be used for a single well sampling. If a bladder pump is used, each well should

have dedicated tubing. Dedicated equipment should still be decontaminated prior to use. By using dedicated equipment, the chances of cross-contamination are greatly reduced.

#### **4.3.3.5 Collection for Volatile Organic Analysis**

Special care should be taken when collecting samples to be analyzed for volatile compounds. The water should be transferred slowly from the bailer, bladder, or inertia pump to the sample container to reduce the potential for aeration of the samples. Samples requiring the analysis for organics should not be filtered or transferred from one container to another because losses of organic compounds onto the walls of the containers or aeration may occur. Samples to be analyzed for Total Organic Carbon (TOC) should be handled and analyzed as materials containing volatile organics. No headspace should exist in the sample containers for volatile compounds or TOC to minimize the possibility of volatilization of organics.

### **4.4 QUALITY CONTROL SAMPLES**

To attain the project quality assurance objectives discussed in this document, certain Quality Control (QC) samples need to be collected and sent to the laboratory. The following is a discussion of those samples:

#### **4.4.1 Trip Blanks**

These samples consist of laboratory-prepared VOA vials, filled with volatile organic-free water which are shipped with the sample containers. These vials remain in the sample cooler and are not to be opened. They will be analyzed in the same manner as the collected samples, and are used to monitor volatile organic compounds due to container contributions or contamination during shipment. A trip blank shall accompany each sampling event (defined as the duration of the sampling of the wells in the plant) for which sample for volatile organic analysis are being collected.

#### **4.4.2 Rinsate Blanks**

These samples are used to monitor contamination resulting from the sampling equipment and also to monitor the effectiveness of equipment decontamination procedures. Rinsate samples

are collected by pouring reagent grade water over decontaminated sampling equipment, in such a manner as to contact the same surfaces as the samples and collecting that water for analysis. Rinsate blanks will be collected at a minimum of one per sampling event. If there is more than one type of parameter being monitored in that sampling event, the rinsate blank will be analyzed for only the organic constituents (volatile and semivolatile, if applicable).

#### **4.4.3 Sample Preservation and Shipment**

The appropriate preservative will be added to each sample bottle by the laboratory prior to being taken into the field. Table 8 lists containers, preservatives, and holding times for the parameters being analyzed in this program.

Once the sample is placed in the bottle, a label should be affixed to the bottle. The label shall contain the following information: plant area, sample number (monitor well number), date, time of sample collection, parameter for analysis, preservative (if any), and the collector's name. The samples shall be placed in an ice chest containing an adequate volume of ice to maintain samples at 4°C. The ice chest should be sealed for shipment.

All samples will be continuously tracked in the field and while in transit. A chain-of-custody form shall accompany the samples at all times. The sample custody procedures are further described in Section 4.4 of this document.

#### **4.5 GROUTING**

Following completion of each borehole, the borehole will be grouted with a cement/bentonite grout (4 to 8 percent bentonite by dry weight). The grout shall consist of Portland cement and powdered sodium bentonite. The grout mix will consist of a pumpable cement/bentonite slurry. The grout shall be mixed in clean, above ground, rigid containers with an appropriate quantity of water. The mixing of each component will be achieved by a mechanical paddle device or recirculation with a grout pump. Mixing activities will continue until a smooth, lump free consistency is achieved.

The grout mixture shall be pumped through a rigid, side discharge tremie pipe placed approximately 6 inches above the bentonite seal for monitor well installation or on the

bottom of the hole for plugging and abandonment of soil borings. The grout mixture shall be pumped until undiluted grout flows from the annulus at the ground surface. The tremie pipe may be slowly withdrawn during grouting operations. The estimated volume of grout will be computed for each boring or well, based upon borehole dimensions and well dimensions. If actual grout placed is less than or exceeds 50 percent of the computed volume, the grouting for that boring or well will be evaluated to determine if grouting problems are present (i.e. caving or excessive grout takes).

After a minimum 24-hour period, the boring or well will be inspected for settlement of the grout and more grout will be added as needed. This process shall be repeated until firm grout is at or within one foot of the ground surface.

The specifications for the materials making up the grout are:

- Bentonite will be powdered, granular, or chipped sodium montmorillonite furnished in moisture resistant sacks and without additives.
- Cement will be a low-alkaline Portland Cement, Type I in conformance with ASTM C-150 and without additives.

**4.6 AQUIFER TESTING (To be implemented prior to detailed design of corrective action)**

Single well tests are referred to as slug tests. These tests are performed by suddenly adding or removing a slug (known volume) of water from a monitor well and observing the recovery of the water surface to its original level. In systems where the entire depth of the aquifer formation is screened, such tests provide information on the horizontal component of hydraulic conductivity. When only a portion of the aquifer depth is screened, the slug test results give a hydraulic conductivity containing both horizontal and vertical components. Most of the pressure loss (head loss) is dissipated in a horizontal direction, therefore, the value of hydraulic conductivity evaluated is assumed to be most horizontal. Bower (1978) discusses a slug-test procedure applicable to fully or partially penetrating wells in unconfined aquifers. He discusses the use of dimensionless solutions of the Thiem equation to determine the hydraulic conductivity from observed values of water level and elapsed time.

#### 4.6.1 Equipment

Slug testing equipment will consist of:

- Pressure transducer(s)
- Suspended weight of known volume (slug).
- Electric water level probe and/or steel tape.
- Data logger (recorder)
- Field data printer.

Since the pumping test program will be developed as needed after performing the slug testing, it is not possible to identify equipment to be used in conducting the pumping test(s) at this time. A listing of such equipment will be compiled when the pumping test program has been developed.

#### 4.6.2 Procedure

The specific slug test performed will be a falling head test followed by a rising head test. Measurements of the behavior of the piezometer system as it returns to equilibrium are then made and used for analysis. The test will be run until the system has achieved 90 percent equalization. Field procedures for slug testing are as follows:

- The magnitude of instantaneous head change resulting from introduction or removal of the slug shall not cause water to overflow the casing. To assure meeting these requirements, magnitude of head change shall be determined prior to introduction of the slug. The magnitude determination shall be based on the calculated volume of the slug and the inside diameter of the casing. The test shall proceed only when these requirement are met.
- All equipment shall be decontaminated prior to placing into the piezometer. Decontamination shall consist of triple rinsing with deionized water.
- The static water level shall be measured using an electronic water level sensor or weighted tape.

- When the transducer is lowered into the piezometer and in place, the slug shall be introduced as rapidly as possible without causing undue splashing or turbulence so as to produce an instantaneous head increase. The instant the slug is set in place, the reference time will be time zero.
- Water levels shall be measured continuously (millisecond intervals) with the transducer and recorded with the data logger unit. Measurements shall be terminated when the water level stabilizes or when the water level has reached a level within 10 percent of static level.
- Water level measurements recorded shall be checked for credibility before proceeding to the next testing stage (removal of the slug).
- When checking of data has been completed and the previous testing has been determined to be acceptable, the slug shall be removed as rapidly as possible to produce an instantaneous head reduction. The instant the slug is removed from the water, the reference time will be time zero.
- Water levels shall be measured continuously (as in the previous testing stage) using the transducer and shall be recorded using the data logger unit. Measurements shall be terminated when the water level stabilizes or reaches a level within 10 percent of initial static water level.
- When measurements are terminated, the transducer shall be removed.
- Water level measurements recorded shall be checked for credibility before proceeding.
- Any test or test stage shall be repeated if review of the recorded data indicates questionable validity.

The data from the slug test will be reduced to evaluated time versus change in water level using the methods of Cooper, et al. (1967) or Bower and Rice (1976). Upon evaluating the results of the slug test, a pumping test plan may be developed.

**4.6.3 Documentation**

Water level data shall be recorded with the data logger and preserved for offloading at the Woodward-Clyde Consultants office in Baton Rouge, Louisiana. To the extent possible, printouts shall be obtained for each set of tests during the data checking phase of testing. Printouts obtained shall be properly labelled to indicated the following and shall be preserved as raw field data:

- Piezometer location
- Piezometer number
- Date of Test
- Elevation of Base of Test Section
- Elevation of Top of Test Section
- Testing Stage (i.e., slug-in or slug-out)

If a printout cannot be obtained, the data shall be hand recorded in the field log book, if possible or the piezometer will be retested.

**WELL INSTALLATION**

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Upon completion of the drilling and sampling as described above for borings three wells will be installed at locations noted in Figure 1 and Figure 2 of the RFI Strategy, Characterization, Schedule and Management Plan.

**5.1 EQUIPMENT**

In addition to drilling and sampling equipment described previously, the material required for installation will consist of:

- A screen to allow entry of ground water.
- A bentonite pellet seal above the filter pack to prevent downward migration into the filter media.
- A filter pack to fill the space between the borehole and the screen with a stable material and to limit entry of fine materials into the well.
- Blank pipe or casing connecting the screen to the ground surface.
- A low permeability grout seal between the casing and the borehole to isolate the screened interval from the ground surface.
- Intermediate casings to seal off permeable zones above the target stratum, as needed.
- A protective casing at the surface.
- A surface slab.
- Protective posts.

**5.1.1 Procedure**

The construction for well involves drilling of borehole to the total depth and backfilling the hole in succession with the screen (with a cap and sump on the bottom), the blank pipe above the screen, a filter pack around the screen, a bentonite pellet layer and cement bentonite grout to the surface.

In the event that it is necessary to "case off" contamination from being carried further subsurface, the following procedure may be followed. Such wells will be constructed by drilling a borehole through the base of the upper permeable zone and one to three feet, at the discretion of the qualified WCC representative, into the underlying clay. A Schedule 40 PVC casing is lowered into the borehole and pushed about one foot into the clay at the base of the boring. The casing is then grouted in place by pumping a cement bentonite grout through a tremie pipe into the borehole between the outer casing wall and borehole wall. At completion of the grouting, the grout is allowed to cure for 24 hours and the downhole drilling equipment is decontaminated. During the grout set period the casing will be capped to prevent tampering until well installation is resumed. After the grout has set, the inside of the 12 inch casing is thoroughly flushed with clean water. The borehole and installation are then completed through the casing. Wells will be surveyed upon completion prior to sampling.

Screen.

Screens will be 2-inch diameter Schedule 40 PVC with No. 10 slot size. Connections between the screen and the casing will be threaded. No glues, solvents, epoxies, thermal processes (except welding) or rivets will be used.

A direct measurement of borehole depth by the use of a clean, chemically inert, weighted measuring tape shall be made before screen placement. The depth, to the nearest tenth of a foot shall be recorded on the construction log.

The borehole shall be purged or flushed with water, to the extent practical of drill cuttings and any bentonite drilling mud used during construction. If during construction unstable soils or other factors resulting in side wall caving or "blow-in", were encountered, the use of temporary casing will be required. The temporary casing shall be steam cleaned and free of coatings and rinsed with water prior to use.

The screen shall be new, commercially fabricated continuously wound or slotted screen with a four-inch nominal diameter. No fittings shall obstruct the inside diameter. The screen will be free of foreign matter and steam cleaned prior to use.

Screens shall be 0.01 inch slot and no longer than 10 feet in length nor shorter than five feet. Screens will be placed based on the qualified WCC representative's description of formation materials.

Filter Pack.

After the screen is placed in the borehole the filter pack will be placed around it. The filter pack material will consist of a clean graded sand (typically 20-40 mesh sand).

None of the filter pack aggregate is to come in contact with the ground surface. Any aggregate that comes in contact with the ground surface or is otherwise contaminated shall not be introduced into the well. Filter aggregate may be placed directly from the bag; however, care will be exercised not to include the dust and fines from the bottom of the sack.

The filter pack is to be placed by either tremie pipe or poured down and around the annulus in such a manner as to be distributed around the screen at a uniform height and density.

If temporary casing is used, the filter pack will be placed first and then the casing partially withdrawn to allow the filter pack to slump against the side walls of the boring. Additional filter aggregate will be added to allow for the slight increase in volume.

The filter pack will extend 1 to 2 feet above the top of the screen unless this height prevents proper placement of the bentonite seal. Placement of an adequate bentonite seal shall override the filter pack thickness except that the filter pack will come at least one foot over the top of screen. In no case shall the filter pack extend such that separate permeable zones are connected.

Pipe and Casing.

Blank pipe or casing made of 2-inch diameter Schedule 40 PVC will extend from the top of the screen to between three and four feet above ground surface. This blank pipe will be attached to the screen by a threaded connection. The casing will be capped with a vented top cap.

Grout Seals.

A bentonite pellet seal shall be 2 or 3 feet in thickness and will be placed in such a manner as to be uniform in thickness around the casing. In placing the bentonite pellets, care will be exercised so as not to incorporate any of the accumulated bentonite fines from the bottom of the packaging container into the annulus.

However, if the soils in this area are unstable to the degree that slumping or collapse of these soils against the permanent wall casing is highly probable, then the bentonite pellet seal shall be placed first and the temporary casing withdrawn as expeditiously as practical. After placement of the bentonite seal, the seal will be given adequate time to hydrate as determined by the qualified WCC representative. After the hydration period, the top of the bentonite seal shall be determined by direct measurement and recorded on the construction log.

The annular space above the bentonite seal will be grouted. All grout materials shall be placed by pumping through rigid, side discharge tremie pipe.

Protective Casing

A 8-inch locking protective casing shall be placed around the PVC riser pipe as soon as possible after grout inspection has been completed. The protective casing shall be provided with a threaded, 1/4-inch hole and drain plug at a base of the exposed portion of the protective casing. The protective casing shall fit such that there is sufficient clearance for cap accessibility.

The inside of the locking cover of the protective casing shall have the following inscribed, stamped or otherwise permanently affixed:

- Identification number
- Top of casing elevation
- Depth
- Screen length
- Date of well installation

- Construction contractor's name

The locking protective casing, at a minimum, shall be five feet in length and extend just over the riser pipe, and be manufactured of new black iron, steel, or stainless steel pipe or will be protective covers commercially manufactured for that purpose. Prior to placement, the casing shall be steam cleaned and free of any asphaltic or resinous coatings except paint or primer applied by the manufacturer. The casing shall be provided with a locking cap that telescopes or in some similar manner extends over and down the casing to prevent the entrance of rainwater, wind-blown dust particles, or insects into the casing. All protective casings shall be provided with a padlock, which shall be locked until the time of sampling.

#### Surface Slab.

A concrete slab will be poured at the ground surface around each well after installation. The slab will be at least four inches thick and five feet square and sloped gently away from the well in all directions.

#### Protective Posts.

Wells located in areas of traffic will be further protected by the erection of four steel posts, or approved alternate, each radially located 4 feet from each well, placed 2 to 3 feet below ground surface, having 3 feet minimally above ground surface. Guard posts shall not be made a part of any protective slab constructed around the well.

#### **5.1.2 Documentation**

Each installed well shall be depicted in an installation report. This report shall be attached to the boring log for that installation and shall graphically denote, by depth from ground surface (unless otherwise specified):

- The bottom of the boring (that part of the boring most deeply penetrated by drilling and/or sampling) and borehole diameter;
- Screen location;
- Granular filter pack;

- Bentonite pellet seal;
- Grout;
- Cave-in(s);
- Height of riser (without cap/plug) above ground surface;
- Protective casing detail;
  - height of protective casing without cap/cover
  - base of protective casing
  - drainage port location and size
  - guard post configuration

The construction report will include:

- The actual quantity and composition of the grout, seals, and granular filter pack used for each well.
- The screen slot size (in inches), outside diameter, schedule/thickness, composition, and manufacturer.
- The outside diameter, schedule/thickness, composition, and manufacturer of the well casing.
- The joint design and composition.
- Location of placement of bentonite pellet seal.
- Location of placement of annular grout.
- Protective casing composition and nominal inside diameter.
- Special problems and their resolutions; e.g., grout in wells, lost casing and/or screens, bridging, etc.
- Dates and times for the start and completion of well installation.

All abbreviations used on the boring logs/well diagrams shall be designated on the log-diagram or in an attached general legend.

For documentation purposes, all information pertinent to field observations and sampling will be recorded in a field logbook with consecutively numbered pages. Entries in the log book will include at least the following:

- Location and sampling activity and address,
- Purpose of sampling,
- Number and approximate volume of samples taken,
- Description of sampling point,
- Date and time of collection,
- Collector's sample identification number(s),
- Sample distribution (e.g., chemical laboratory, geotechnical laboratory, etc.),
- Sample preservation,
- Field observations,
- Any field measurements made, such as pH, temperature, specific conductivity, or other field parameters,
- Weather conditions.

The documentation in the log book will be sufficient to reconstruct the sampling situation without relying on the collector's memory.

### **6.1 BORING LOGS**

Field boring logs of a type similar to that presented in Figure 5 will include at a minimum the following information for each boring location:

- Project name and number
- Boring number
- Location of boring (including measured offset and reason for offset)

- Drilling method
- Name of WCC representative

Each log will also include:

- Sample location number and depth
- Water levels and the respective times of each reading
- Description of subsurface materials using the Unified Soil Classification System (USCS) including classification, consistency, texture, plasticity, moisture content, color, stratification, etc.
- Sample recovery in inches
- Results of organic vapor monitoring, if required
- Sample interval

## **6.2 PIEZOMETER INSTALLATION/DEVELOPMENT REPORTS**

A piezometer installation report will be completed for each newly installed piezometer at the site. Information on these reports shall include the screening interval, depth to sand pack and bentonite seal, and grout backfill. The report will be documented using a form as shown on Figure 7.

## **6.3 GROUNDWATER SAMPLING REPORT**

A sample collection log specific to groundwater sampling will be completed for each monitor well sampled at the site. These reports shall include static groundwater elevation, volumes purged, weather conditions, etc. The report will be on a form similar to Figure 8.

## **6.4 SAMPLE CUSTODY DOCUMENTATION**

Chain-of-custody will be maintained for each sample collected. The chain-of-custody will provide an accurate written record which can be used to trace the possession and holding of samples from the time of collection through data analysis and reporting. The following information will be specified for each sample on the chain-of-custody form:

- Sample number
- Sample date
- Sample time
- Sample location and depth where appropriate
- Analyses to be performed

The chain-of-custody form will be signed by the sample custodian. It will be placed in a water-tight plastic bag and taped to the underside of the lid of the cooler containing the samples designated on the form. The lid of the cooler will be securely taped shut and signed custody seals will be placed on the opening of the cooler lid to allow detection of any possible tampering. Upon arrival in the laboratory, samples will be received by the analytical laboratory representative. Samples contained in the shipment will be compared of the chain-of-custody form to verify that all samples designated have been received. Sample custody within the laboratory will be maintained on internal tracking forms.

The chain-of-custody procedures document sample possession from the time of collection to final disposition. A Sample Analysis Request Form will accompany the Chain-of-Custody form and will document the requested sample analysis.

For the purpose of these procedures, a sample is considered in custody if it is:

- In one's actual possession
- In view, after being in physical possession
- Locked so that no one can tamper with it, after having been in physical custody
- In a secured area, restricted to authorized personnel

A chain-of-custody record will be initiated in the field, and the original will accompany the samples with copies retained at intermediate steps.

Each time responsibility for custody of the sample changes, the new custodian will sign the record and denote the date. A copy of the signed record will be made and retained by the immediately previous custodian to allow tracking of sample possession. All changes of custody of samples must be a person-to-person change of physical possession.

**6.5 ANALYSIS REQUEST**

Analysis of the samples collected shall be in accordance with the EPA CLP protocol. All samples shipped for analytical testing shall be accompanied by a Chain-of-Custody form and Sample Analysis Request form for document requested analyses. A copy of a sample Analysis Request form is presented as Figure 5.

**DECONTAMINATION**

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Personnel will wear appropriate protective clothing during decontamination as required by the Health and Safety Plan. All protective equipment (gloves, boots, etc.) will be decontaminated after use or they will be disposed in drums, labeled, dated, and stored until disposed at an approved facility.

**7.1 CROSS-CONTAMINATION CONTROL PROCEDURES**

In order to minimize the possibility of cross-contamination, strict cross-contamination control procedures should be followed. These procedures include:

- Sample jars should be kept in limited access areas until used.
- Clean equipment should be wrapped in aluminum foil or plastic sheeting prior to use.
- Clean plastic sheeting shall be placed at the sampling area and all equipment should be placed on the sheets. This plastic shall be discarded after each use.
- Equipment refueling shall be performed in designated areas. These areas should be at a distance from any sampling points, to minimize the potential that vapors from fuel will affect sample quality.
- All purge water, decontamination water, and discarded gloves should be containerized for disposal.

To prevent contamination prior to drilling operations, the following will be applied:

- Only new materials will be used. Only bagged cement, powdered bentonite in bags or bentonite pellets in well protectors will be used.
- PVC pipe for riser and well screen will be cured and free of plasticizers and oils.

- Workers will wear clean cotton or surgical gloves when handling riser and well screen.
- Electrical tape will not be used to band pumps.

## **7.2 SAMPLING EQUIPMENT DECONTAMINATION**

All equipment used to collect groundwater samples should be decontaminated prior to the collection of the samples and in between sample locations. Decontamination of this equipment will be accomplished by the following procedures:

- Wash equipment thoroughly with laboratory, phosphate free detergent (i.e., Alconox) and de-ionized water using a brush to remove any particular matter or surface film.
- Triple rinse equipment thoroughly with clean deionized water.
- Rinse equipment thoroughly with methanol.
- Triple rinse with clean deionized water.

In the event that metals become a primary concern, sampling equipment will be rinsed with HCl prior to the methanol rinse. The sampling equipment will be wrapped in aluminum foil or visqueen after decontamination until reuse. This equipment will be decontaminated in areas established near the perimeter of the sampling area. Rinsate samples will be collected as indicated in the Quality Assurance Plan.

## **7.3 PUMP DECONTAMINATION**

If a monitor well has been purged or sampled using any of the pumps as discussed, the pumps used need to be decontaminated between sample points. Decontamination of the pumps includes washing with soap and rinsing the outside portion of the pumps (especially those pumps that are placed inside the wells) as well as running water through the pump. It is recommended that a sufficient volume of distilled water or de-ionized water be run through the pumps to clean them out.

**7.4 DOWNHOLE EQUIPMENT DECONTAMINATION**

The drilling rig with associated tools and all sampling equipment will be decontaminated before entering the site and leaving the site. Downhole equipment (i.e., augers, bits, samplers, etc.) will be cleaned between boring or other sampling locations at a decontamination/washdown pad. Wash water will be containerized or transported to the wastewater treatment facility.

The equipment will be cleaned as described below:

- The drill rig, all auger flights, auger bits, drilling rods, drill bits, core barrel samplers, Shelby tubes, or other parts of the drilling and well development equipment that will contact the soil or groundwater should be cleaned with a steam cleaner or hand washed with a brush and detergent to remove oil, grease, and any contamination that has accumulated on the equipment.
- Any sampling equipment which can be safely steam cleaned shall be decontaminated as described above.
- These units should then be rinsed thoroughly with potable water

## SAMPLE ANALYSIS

## 8.1 ANALYTICAL PROCEDURES

During the RFI field work there will be analyses performed for constituents of concern from the following list:

| List: | Parameter or Group of Parameters:                           |
|-------|---|
| A     | Atrazine, cyanazine, arsenic, dinoseb, toxaphene, toluene   |
| B     | TCL, TAL, atrazine, cyanazine, dinoseb                      |
| C     | Atrazine, cyanazine, arsenic, dinoseb, toxaphene            |
| D     | TCL, dioxin, TAL, atrazine, cyanazine, dinoseb              |
| E     | BTEX, TPH   |
| F     | BTEX, TPH, atrazine, cyanazine, arsenic, dinoseb, toxaphene |

A table listing the SWMU Number, number of samples to be taken and the analytes and parameter or group of parameters is presented as Table 1 for the RFI Workplan and Table 2 for the Groundwater Assessment Workplan.

A summary of the parameter and possible methods to be employed by the offsite laboratory are as follows:

| Parameter:                        | Protocol  |
|-----------------------------------|---|
| Toxaphene, Atrazine and Cyanazine | EPA SW-846, Method 8080   |
| Dinitrobutyl Phenol (Dinoseb)     | EPA SW-846, Preparation Method 3550, Analysis Method 8015   |
| Arsenic                           | EPA SW-846, Method 7060   |
| Toluene                           | EPA SW-846, Method 8020   |
| TCL, Dioxin (see Table 3)         | <u>Statement of Work for Organic Analysis Multi-Media Multi-Concentration</u> , SOW 2/88, Revision 9/88, 4/89, and 5/89, Office of Solid Waste and Emergency Response, U.S. EPA, Washington, D.C., May 1989 |

| Parameter:       | Protocol  |
|------------------|---|
| TAL (see Table 4 | <u>Statement of Work for Organic Analysis Multi-Media Multi-Concentration</u> , SOW No. 788, Revisions 2/89 and 6/89, Office of Solid Waste and Emergency Response, U.S. EPA, Washington, D.C., June 1989 |

## 8.2 CALIBRATION PROCEDURES AND FREQUENCY

Measuring and test equipment used in the field and laboratory shall be controlled by a formal calibration program. The program shall provide equipment of the proper type, range, accuracy, and precision to provide data compatible with the specified requirements and desired results. Calibration of measuring and test equipment may be performed internally using in-house reference standards, or externally by agencies or manufacturers.

### 8.2.1 Calibration Procedures

Documented and approved procedures shall be used for calibrating measuring and test equipment. Whenever possible, widely accepted procedures, such as those published by the ASTI or U.S. EPA, or procedures provided by manufacturers in equipment manuals, shall be adopted.

Calibrated equipment shall be uniquely identified by using either the manufacturer's serial number, an equipment identification number, or other means. This identification, along with a label indicating when the next calibration is due (only for equipment not requiring daily calibration), shall be attached to the equipment. If this is not possible, records traceable to the equipment shall be readily available for reference. *It is the responsibility of all personnel* to check the calibration status from the due date labels or records prior to using the equipment.

Measuring and test equipment shall be calibrated at prescribed intervals and/or as part of operational use. Frequency shall be based on the type of equipment, inherent stability, manufacturer's recommendations, values given in national standards, intended use, and experience. Equipment shall be calibrated, whenever possible, using reference standards having known relationships to nationally recognized standards (e.g., National Bureau of

Standards) or accepted values of physical constants. If national standards do not exist, the basis for calibration shall be documented.

Reference standards (physical and chemical) shall be used only for calibration. Physical standards shall be stored separately from working measuring and test equipment. Equipment that fails calibration or becomes inoperable during use shall be removed from service and segregated to prevent inadvertent use and shall be tagged to indicate it is out of calibration.

Records shall be prepared and maintained for each piece of calibrated measuring and test equipment to indicate that established calibration procedures have been followed. Laboratory calibration records shall be maintained by the laboratory.

### **8.2.2 Field Equipment Calibration**

Field calibration procedures will be performed on field instrumentation as follows:

- pH Meter - Premeasurement calibration and post-measurement verification using at least two standard buffer solutions for each sample tested. The buffer solutions should bracket the sample pH. The two measurements must be within  $\pm 0.05$  standard unit of buffer solution values.
- Conductivity Meter - Daily calibration using potassium chloride (KCl) standard solution. The meter measurement must read  $\pm 10$  percent of the standard to be considered in control.
- Temperature - Temperature is measured using a thermostat built into the conductivity meter. The readings will be checked at least once at the start of the field use of the instrument using a quality grade thermometer.
- OVA - The instrument will be calibrated daily to a methane in air standard.

Calibration of field equipment shall be documented in the field log book for reference and maintained in the project files.

**8.2.3 Laboratory Equipment Calibration**

Laboratory calibration procedures for analytical testing will be performed in accordance with SW-846, 3rd Edition and EPA CLP protocols, as appropriate.

**DATA REDUCTION, REPORTING, AND VALIDATION**

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To ensure that the analytical DQOs for the project are met and to evaluate the overall acceptability of the analytical data, a review of the laboratory analytical report will be conducted. This review will consist of a check of "external" and "internal" laboratory QA/QC results.

The external quality assurance review will include a check of contaminants in the field-collected QA samples (trip blank, rinsates and duplicate samples) submitted with the environmental samples. Evidence of contaminants in these QA samples will be compared against the environmental sample results to evaluate whether detected constituents are related to field or laboratory artifacts.

The internal quality assurance review will include a review of the laboratory QA/QC results to determine if holding times, initial and/or continuing calibration curves, surrogate recoveries, matrix spikes and matrix spike duplicates and blank contamination objectives have been met according to the laboratory's internal quality assurance program.

**9.1 DATA REDUCTION**

All concentration associated with samples or prepared sample extracts or digestates will be taken directly from multiplied quantitation reports. Multiplied quantitation reports relate the instrumentally measured extract or digestate concentrations to those of the original sample. GC/MS concentration data will be taken, to the extent possible, directly from the data systems following an internal standard calibration for both the volatile and semivolatile base/neutral/acid compounds and following an external calibration for both the pesticide and herbicide compounds.

## **9.2 DATA REPORTING**

The intention of these sampling data reporting procedures is to maintain accurate records of all samples taken and to follow the status of the sample location and analytical results, while minimizing the duplication of record keeping activities and the possibilities for errors.

The tabulation and flow of all data reporting information can be broken down into the following activities:

- Assignment of sample numbers, sample label preparation, and initial permanent record keeping,
- Preparation and labeling of all sample bottles,
- Sampling and in-the-field record keeping,
- Sample receiving and preparation for shipping, and
- Complete sample record book.

### **9.2.1 Sampling Record Keeping**

Prior to collecting a group of samples, a sample coordinator will assign a sample number and a description to all samples to be collected within the group. Sample numbers will be assigned to all divisions of the original sample, all of which have the same identification number with letters denoting subset containers. The sample number and corresponding description will be entered into a permanent record book. The information in the record book will then be written onto the appropriate sample label. When written, the sample labels will be given to the individual responsible for preparing the sample bottles.

The typed/printed labels for a group of sequentially numbered samples and a copy of the data book pages that include these numbers will be given to the sample bottle preparer and/or the sampler. This individual is responsible for applying all labels on the appropriate types of bottles. The sample preparer may also be the person who will be doing the sampling. A copy of the data book pages that include information about the samples will also be given to the person doing the sampling in order to provide a list of samples to check off during the sampling activity.

The individual(s) doing the sampling is (are) responsible for verifying that each sample is put in the appropriate sample bottle. At the time of sampling this person must fill in the time sampled, the date sampled, and sign and complete the sample's label. By the end of the sampling day, the sampler must return all samples to the geologist or engineer, who will oversee preparation of the samples for shipment (i.e., review chain-of-custody forms, inspect packaging, etc.

The person responsible for shipping the full sample bottles will compare the sample bottles with the appropriate sample data book pages. This person will then prepare the samples for shipping. Chain-of-custody forms must be completed for each sample; the originals must be sent with the samples, and copies will be sent to the sample coordinator to include in the appropriate project files.

### **9.2.2 Sample Custody and Shipment**

When the samples are ready to be sent to the laboratory, the sample coordinator will examine the samples and note their condition. Information including the date sampled, time sampled, and method of preservation, for each sample will be entered in the sample record book.

At the time the samples are shipped, the sample coordinator will have a copy of the pages in the sample record book that include information on the sample numbers and the corresponding information on the date sampled, time sampled, and the date shipped.

The chain-of-custody record will document the fact that the evidentiary integrity of the samples was maintained.

### **9.2.3 Laboratory Response**

The laboratory will be responsible for reviewing all sample analyses according to their internal QA/QC procedures. Data validation will be completed by the laboratory prior to the delivery of the data package. Completed data packages will be available for review by the project data validation coordinator. Any problems will be resolved and all data will be validated before the data are reported.

Laboratory data for all CLP TCL and TAL parameters will be maintained sufficient to be able to generate the standard CLP forms, if necessary at a later date. The quality control data and sample data results will be presented in a concise and convenient tabulated summary. The calibration data, raw quality control data, and raw sample data will be sufficient to permit reproduction of the calculation of any of the reported values. In addition, routine laboratory reports will include the following:

- Chain-of-Custody Records
- Quality Control Summary
- Sample Data Results

When generated, each hard copy CLP data package will provide thorough coverage according to the following areas:

- Case Narrative
- Chain-of-Custody
- Quality Control Summary
- Sample Data Results
- Calibration Data
- Raw Quality Control Data
- Raw Sample Data

The case narrative will provide the following information:

- Sample Identification
- Parameters Characterized
- Analytical Methods Employed
- Any Deviation from the Project Work Plan
- All Problems Encountered
- Any Corrective Actions Taken

### 9.3 DATA VALIDATION

Data validation, according to Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans (QAMS-0050/80, Office of Monitoring System and Quality Assurance and Office of Research and Development, U.S. Environmental Protection Agency, Washington, D.C. 20460, December 29, 1980), is "a systematic process for reviewing a body of data against a set of criteria to provide assurance that data are suitable for their intended use", and entails editing, screening, checking, auditing, verification, certification, and review.

The purpose of data validation is to determine if the data conform to specifications and are suitable for the intended project usage. Therefore, all data will be potentially subjected to screening in terms of conformance to project specifications and suitability for use. After completing a sampling program, the field data package (calibration records, chain-of-custody, field logs, etc), will be reviewed for completeness and accuracy. The validation process described below will be done separately from the laboratory performing the analytical work as a separate process from internal laboratory data validation.

The following is a brief description of the methods that will be used if validation of the CLP laboratory data is required. These data will be reported in a summary data package and evaluated for conformance to the analytical limits set forth in Functional Guidelines for Evaluating Organic Analyses (Hazardous Site Evaluation Division, U.S. Environmental Protection Agency, February, 1988) and Functional Guidelines for Evaluating Inorganic Analyses (Hazardous Site Evaluation Division, U.S. Environmental Protection Agency, July, 1988). *These checks will be performed on all samples analyzed, and the results will be summarized in a report for each lot of reported sample data. Qualified data will be reported as such and the appropriate qualifiers will be used for reporting. Non-CLP data and CLP data not required to be validated will be reviewed with respect to holding times, initial and continuing calibrations, method blanks, laboratory control samples, samples, matrix spikes and matrix spike duplicates or duplicates.*

If problems occur which would reject data, the following outline of procedures should detect these problems and the problem data will not be reported. However, rejected data will be addressed in a validation report.

- Compile a list of all investigative samples.
- Compile a list of all QC samples, including but not limited to:
  - Trip blanks
  - Laboratory blanks
  - Laboratory duplicates
  - Performance samples
  - Matrix spikes
  - Matrix spike duplicates
  - Laboratory control spikes
  - Laboratory control spike duplicate
- Review chain-of-custody documents for completeness and correctness.
- Review laboratory analytical procedures and instrument performance criteria.
  - Sample media identification
  - Sample location and descriptions
  - Proper concentration units
  - Proper significant figures
- This data summary will be reviewed for potential data quality problems including:
  - Unexpected results
  - Common laboratory contaminants
  - Unusual spacial concentration/identification relationships
  - Samples in which dilution was necessary
  - Samples which may have exhibited "carry over"
- A sample summary will be prepared to assess precision, accuracy and completeness of the analytical data.
- Laboratory records and data package requirements will be checked to assess completeness of the data package.

Laboratory performance results will be documented from the validation procedures or from precision or accuracy evaluations. The validation personnel will provide a means to notify the laboratory and initiate the appropriate corrective actions.

**INTERNAL QUALITY CONTROL**

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**10.1 DATA TRANSCRIPTION**

All data transcriptions for final reports will be reviewed before reporting. Data transcription requirements may vary, but should be monitored in accordance with requirements for accuracy and legibility.

**10.2 FIELD SAMPLING QUALITY CONTROL**

Quality control for field sampling includes duplicate samples, field blanks and rinsate blanks. Steps and checks used to validate precision and accuracy of the measured parameters and to support the representativeness, comparability, and completeness of the work include:

- Description of the calibration of methods and instruments,
- Description of routine instrument checks (noise levels, drift, linearity, etc.),
- Documentation of traceability of instrument standards, samples and data,
- Documentation on analytical methodology and QC methodology,
- Description of applicable performance audits with appropriate audit materials,
- Description of controls for interference contaminants in analytical methods (use of reference blanks and check standards for method accuracy and precision),
- Description of levels of routine maintenance to verify analytical reliability, and
- Documentation of sample preservation and transport.

**10.3 VERIFICATION AND REVIEW**

The laboratory analyst should review data to verify that where appropriate, the laboratory:

- Calculates the recoveries of surrogate spikes,

- Verifies that there are no contaminants in all associated blanks,
- Compares samples and duplicates for matches in data results,
- Reviews surrogate and spike recovery data to make sure they are within quality acceptance limits,
- Verifies calibration performance for acceptability,
- Reviews and verifies instrument tuning,
- Reviews internal areas of response for acceptability.
- Makes sure the surrogate recovery section has been completed
- Makes sure that all analyzed compounds have been properly recorded
- Confirms identified sample spectra with standard spectra
- Verifies accuracy of calculations on compound quantities.

The supervisor examines the entire sample folder to verify that all data transcriptions and documentation included meets WCC requirements. The supervisor also reviews all data enclosed to verify that the data transcriptions are error free and that all documents are legible and in contractual order.

**PERFORMANCE AND SYSTEM AUDITS**

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Audits may help to verify that the integrity of the data and related information is maintained.

**11.1 FIELD ACTIVITY AUDITS**

A senior project personnel or designee may periodically conduct an audit of the collection activities to verify that proper sampling protocol is being followed. Some of the items to evaluate include: sampling operations, sampling labelling, sample handling, field notes, decontamination procedures, and chain-of-custody. The auditor will prepare a summary audit report containing the result of the evaluation and recommendations for any corrective actions.

The auditor may check the following items to determine the completeness and accuracy of field activities:

- **Sample Labels:** A selected number of sample labels will be examined to determine if they were filled out properly and completely.
- **Chain-of-Custody Procedures:** Several chain-of-custody records will be examined to determine if they were properly filled out; if parameters for analysis were properly identified; all custody transfers were documented; and date and time of transfer were recorded.
- **Field Notebooks:** The notebooks will be examined to determine if proper recording format is being followed; if all in situ measurements and field observations are being documented suitably to explain and reconstruct field activities.

**11.2 LABORATORY PERFORMANCE AUDITS**

The performance of laboratories in the U.S. EPA Contract Laboratory Program is monitored by the agency by using quarterly blind performance samples. Should the laboratory

employed to analyze samples be in the CLP, then acceptable results on the most recent quarterly blind performance evaluation sample will be accepted as demonstrating laboratory capability to perform volatile, semivolatile and pesticide/PCB analyses. Performance evaluation samples may be obtained from a commercial supplier for laboratories that are not part of the EPA Contract Laboratory Program.

An on-site laboratory evaluation helps to verify that all the necessary quality control is being applied by the laboratory in order to deliver a high quality product. A laboratory audit of the laboratory used for sample analysis may be performed during the program.

Quality assurance evaluations allow the evaluators to determine that:

- The organization and personnel are qualified to perform assigned tasks.
- Adequate facilities and equipment are available.
- Complete documentation, including chain-of-custody of samples, is being implemented
- Required analytical methodology is being used.
- Adequate analytical quality control, calibration including reference samples, control charts, and documented corrective action measures, is being provided.
- Acceptable data handling, documentation techniques, and data review are being used.

**PREVENTIVE MAINTENANCE**

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In order to timely and effectively complete a measurement effort, an attempt should be made to minimize downtime of all instrumentation. This is achieved by regular inspections of equipment and the availability of spare parts or supplemental instrumentation should the equipment fail.

WCC's preventative maintenance program is designed to minimize the down time of crucial sampling and/or analytical equipment due to expected or unexpected component failure. In implementing this program, efforts are focused in three primary areas:

- Establishment of maintenance responsibilities
- Establishment of maintenance schedules for major and/or critical instrumentation and apparatus, and documentation of maintenance activities in equipment logs.
- Establishment of an adequate inventory of critical spare parts and equipment.

**12.1 FIELD INSTRUMENTATION**

All instrumentation to be used in collecting or testing the groundwater samples will be regularly serviced and at a minimum, inspected prior to going out in the field to collect samples.

When laboratory or field equipment is damaged or it cannot be verified that it will produce acceptable data, the equipment will be removed from service to be repaired or replaced. The equipment will not be returned to service until it has been verified that it is capable of producing acceptable data. Acceptable data as referenced here is data which meets quality assurance criteria for precision, accuracy, and representativeness. Equipment leased or purchased to replace damaged equipment shall be capable of producing equivalent data. The WCC site managers will be responsible for the repair and/or replacement of damaged field equipment and field equipment provided by its subcontractors.

If nonanalytical type field equipment is damaged, it will be repaired immediately such that work may progress, or be replaced with similar or equivalent equipment such that the project objectives and the approved work plan will be met. The laboratory manager and site manager will retain documentation for the repair and/or replacement of laboratory and field equipment, respectively.

## **12.2 ANALYTICAL INSTRUMENTATION**

The laboratory is expected to maintain and inspect their equipment. Instrument redundancy, to the extent possible, coupled with an extensive stock of spare parts and expendable materials on-site will serve to minimize downtime.

Subcontract laboratories may be inspected to verify that similar preventive maintenance programs are in operation, and are properly documented including the following:

- Accepting data with an acknowledged level of uncertainty.
- Resampling and analyzing.
- Recalibration of instruments using freshly prepared calibration standards.
- Replacement of solvent or other reagents that give unacceptable blank values.
- Additional training of laboratory personnel in correct implementation of sample preparation and analysis methods.

The laboratory manager will be responsible for the repair and/or replacement of damaged laboratory equipment.

**CORRECTIVE ACTION**

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During the course of this investigation, it will be the responsibility of the sampling team members to see that all measurement and sampling procedures are followed as specified and that measurement data meet the prescribed acceptance criteria. In the event a problem is discovered, it is imperative that prompt and prescribed action to be taken to correct the problem. Corrective action will be initiated, for instance, if QC data are found to exceed acceptability limits.

Whenever corrective action is necessary to eliminate the cause of nonconformance, a closed-loop corrective action system will be used. The analytical coordinator will verify that all of these steps are followed:

- The problem will be defined,
- Responsibility for investigating the problem will be assigned,
- The cause of the problem will be investigated and determined,
- A corrective action to eliminate the problem will be determined,
- Responsibility for implementing the corrective action will be assigned and accepted,
- The effectiveness of the corrective action will be established, and
- The fact that the corrective action has eliminated the problem will be verified.

**13.1 CORRECTIVE ACTION FOR FIELD SITUATION**

If problems become apparent that are identified as originating in the field, corrective action will take place. If corrective action does not resolve the problem, appropriate personnel will be assigned to investigate and evaluate the cause of the problem. Once a corrective action is implemented, the effectiveness of the action will be verified.

**13.2 CORRECTIVE ACTION FOR LABORATORY SITUATIONS**

The need for corrective action will be initiated in consultation with the environmental lab personnel. Corrective Action may include, but is not limited to :

- Accepting data with an acknowledged level of uncertainty,
- Resampling and analyzing,
- Recalibration of instruments using freshly prepared calibration standards,
- Replacement of solvent or other reagents that give unacceptable blank values,
- Additional training of laboratory personnel in correct implementation of sample preparation and analysis methods.

QUALITY ASSURANCE REPORTS TO MANAGEMENT

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Quality Assurance reports, if required, will include a tabulation of the analytical data and an explanation of any sampling conditions or QA/QC problems and their possible effects on data quality.

The laboratory analytical program manager and the data validation coordinator will communicate as needed to verify that all QA/QC practices are being carried out and to review possible or potential problem areas. Data anomalies are to be investigated to assess whether they are a result of operator or instrument deviation, or if they are a true reflection of the site or task function.

Analytical QA reports, if required, will contain a discussion of QA/QC evaluations summarizing the quality of the data collected an/or used as appropriate to each phase of the project and the following information:

- Tabulated results of the analytical data.
- Work sheets from the data personnel evaluating the validity of any analytical data with respect to accuracy, precision, and completeness.
- A summary of significant QA problems with the corrective actions taken to rectify the situation.

**TABLES**

**TABLE 1**  
**RFI WORKPLAN SAMPLE SUMMARY**

| SWMU Number   | Sample Points | Samples<br>(Soil or Concrete) | Analyte List |
|---|---------------|-------------------------------|--------------|
| 1/17  | 12            | 34                            | A            |
| 2 - Landfill  | 10            | 23                            | B            |
| 4 - Activated Carbon Treatment  | 6             | 6                             | B            |
| 5 - South Plant Drainage  | 16            | 16                            | C            |
| 7/20 - Former Dinoseb Production<br>Area/Railroad Car Loading/Unloading Station | 21            | 42                            | A            |
| 8 - Dinoseb Loading/Unloading Area  | 2             | 6                             | A            |
| 11/12/15 MSMA-Methyl Production Area  | 5             | 13                            | D            |
| 13 - West Drainage  | 9             | 9                             | C            |
| 14 - Toxaphene  | 3             | 6                             | C            |
| 16 - Atrazine   | 5             | 13                            | C            |
| 18 - Blue Tank  | 3             | 3                             | C            |
| 30 - Waste Oil  | 3             | 3                             | E            |
| 34 - Junkyard   | 6             | 6                             | F            |

**LEGEND:**

- A Atrazine, cyanazine, arsenic, dinoseb, toxaphene, toluene
- B TCL, TAL, atrazine, cyanazine, dinoseb
- C Atrazine, cyanazine, arsenic, dinoseb, toxaphene
- D TCI, dioxin, TAL, atrazine, cyanazine, dinoseb
- E BTEX, TPH
- F BTEX, TPH, atrazine, cyanazine, arsenic, dinoseb, toxaphene

**TABLE 2**

**GROUNDWATER ASSESSMENT WORKPLAN SAMPLE SUMMARY  
(IMPLEMENTED CONCURRENTLY WITH RFI)**

|                            | <b>Samples (Groundwater)</b> | <b>Analyte List</b>                            |
|----------------------------|------------------------------|--|
| 3 New Wells in South Plant | 3                            | TCL, dioxin, TAL, atrazine, cyanazine, dinoseb |

TABLE 3 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|                              | Quantitation Limits <sup>a</sup> |  |
|------------------------------|----------------------------------|--|
|                              | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| trans-1,2-Dichloropropane    | 5                                | 5  |
| Bromoform                    | 5                                | 5  |
| 4-Methyl-2-pentanone         | 10                               | 10                                       |
| 2-hexanone                   | 10                               | 10                                       |
| Tetrachloroethene            | 5                                | 5  |
| Toluene                      | 5                                | 5  |
| 1,1,2,2-Tetrachloroethane    | 5                                | 5  |
| Chlorobenzene                | 5                                | 5  |
| Ethyl Benzene                | 5                                | 5  |
| Styrene                      | 5                                | 5  |
| Xylenes (Total)              | 5                                | 5  |
| <b>Semivolatile Organics</b> |                                  |  |
| Phenol                       | 10                               | 330                                      |
| bis-2-Chlorophenol           | 10                               | 330                                      |
| 2-Chlorophenol               | 10                               | 330                                      |
| 1,3-Dichlorobenzene          | 10                               | 330                                      |
| 1,4-Dichlorobenzene          | 10                               | 330                                      |
| Benzyl Alcohol               | 10                               | 330                                      |
| 1,2-Dichlorobenzene          | 10                               | 330                                      |
| 2-Methylphenol               | 10                               | 330                                      |
| bis(2-Chloroisopropyl)ether  | 10                               | 330                                      |
| 4-Methylphenol               | 10                               | 330                                      |
| N-Nitro-di-n-dipropylamine   | 10                               | 330                                      |
| Hexachloroethane             | 10                               | 330                                      |

TABLE 3 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|  | Quantitation Limits <sup>a</sup> |  |
|--|----------------------------------|--|
|  | Groundwater<br>µg/L              | Low Soil/ Sediment<br>µg/Kg <sup>b</sup> |
| Nitrobenzene                                     | 10                               | 330                                      |
| Isophorone                                       | 10                               | 330                                      |
| 2-Nitrophenol                                    | 10                               | 330                                      |
| 2,4-Dimethylphenol                               | 10                               | 330                                      |
| Benzoic Acid                                     | 50                               | 1600                                     |
| bis(2-Chloroethoxy)methane                       | 10                               | 330                                      |
| 2,4-Dichlorophenol                               | 10                               | 330                                      |
| 1,2,4-Trichlorobenzene                           | 10                               | 330                                      |
| Naphthalene                                      | 10                               | 330                                      |
| 4-Chloroaniline                                  | 10                               | 330                                      |
| Hexachlorobutadiene                              | 10                               | 330                                      |
| 4-Chloro-3-methylphenol(para-chloro-meta-cresol) | 10                               | 330                                      |
| 2-Methylnaphthalene                              | 10                               | 330                                      |
| Hexachlorocyclopentadiene                        | 10                               | 330                                      |
| 2,4,6-Trichlorophenol                            | 10                               | 330                                      |
| 2,4,5-Trichlorophenol                            | 50                               | 1600                                     |
| 2-Chloronaphthalene                              | 10                               | 330                                      |
| 2-Nitroaniline                                   | 50                               | 1600                                     |
| Dimethylphthalate                                | 10                               | 330                                      |
| Acenaphthylene                                   | 10                               | 330                                      |
| 2,6-Dinitrotoluene                               | 10                               | 330                                      |
| 3-Nitroaniline                                   | 50                               | 1600                                     |
| Acenaphthene                                     | 10                               | 330                                      |
| 2,4-Dinitrophenol                                | 50                               | 1600                                     |

TABLE 3 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|                             | Quantitation Limits <sup>a</sup> |  |
|-----------------------------|----------------------------------|--|
|                             | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| 4-Nitrophenol               | 50                               | 1600                                     |
| Dibenzofuran                | 10                               | 330                                      |
| 2,4-Dinitrotoluene          | 10                               | 330                                      |
| Diethylphthalate            | 10                               | 330                                      |
| 4-Chlorophenyl-phenyl-ether | 10                               | 330                                      |
| Fluorene                    | 10                               | 330                                      |
| 4-Nitroaniline              | 50                               | 1600                                     |
| 4,6-Dinitro-2-methylphenol  | 50                               | 1600                                     |
| N-Nitrosodiphenylamine      | 10                               | 330                                      |
| 4-Bromophenyl-phenylether   | 10                               | 330                                      |
| Hexachlorobenzene           | 10                               | 330                                      |
| Pentachlorophenol           | 50                               | 1600                                     |
| Anthracene                  | 10                               | 330                                      |
| Di-n-butylphthalate         | 10                               | 330                                      |
| Fluoranthene                | 10                               | 330                                      |
| Pyrene                      | 10                               | 330                                      |
| Butyl Benzyl Phthalate      | 10                               | 330                                      |
| 3,3'-Dichlorobenzidine      | 20                               | 660                                      |
| Benzo(a)anthracene          | 10                               | 330                                      |
| Chrysene                    | 10                               | 330                                      |
| bis(20Ethylhexyl)phthalate  | 10                               | 330                                      |
| Di-n-octylphthalate         | 10                               | 330                                      |
| Benzo-(b)fluoranthene       | 10                               | 330                                      |
| Benzo-(k)fluoranthene       | 10                               | 330                                      |

TABLE 3 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|                       | Quantitation Limits <sup>a</sup> |  |
|-----------------------|----------------------------------|--|
|                       | Groundwater<br>$\mu\text{g/L}$   | Low Soil/ Sediment<br>$\mu\text{g/Kg}^b$ |
| Benzo(a)pyrene        | 10                               | 330                                      |
| Ideno(1,2,3-cd)pyrene | 10                               | 330                                      |
| Dibenz(a,h)anthracene | 10                               | 330                                      |
| Benzo(g,h,i)perylene  | 10                               | 330                                      |
| <b>Pesticide/PCBs</b> |                                  |  |
| alpha-BHC             | 0.05                             | 8.0                                      |
| beta-BH               | 0.05                             | 8.0                                      |
| delta-BHC             | 0.05                             | 8.0                                      |
| gamma-BHC             | 0.05                             | 8.0                                      |
| Heptachlor            | 0.05                             | 8.0                                      |
| Aldrin                | 0.05                             | 8.0                                      |
| Heptachlor Epoxide    | 0.05                             | 8.0                                      |
| Endosulfan I          | 0.05                             | 8.0                                      |
| 4,4'-DDE              | 0.10                             | 16.0                                     |
| Endrin                | 0.10                             | 16.0                                     |
| Endosulfan II         | 0.10                             | 16.0                                     |
| 4,4'DDD               | 0.10                             | 16.0                                     |
| Endosulfan Sulfate    | 0.10                             | 16.0                                     |
| 4,4'-DDT              | 0.10                             | 16.0                                     |
| Methoxychlor          | 0.05                             | 80.0                                     |
| Endrin ketone         | 0.10                             | 16.0                                     |
| alpha-Chlordane       | 0.05                             | 80.0                                     |
| gamma-Chlordane       | 0.05                             | 80.0                                     |
| Toxaphene             | 1.0                              | 160.0                                    |

TABLE 3 (Continued)

**TARGET COMPOUND LIST (TCL) AND  
CONTRACT REQUIRED QUANTITATION LIMIT (CRQL)\***

|              | Quantitation Limits* |  |
|--------------|----------------------|--|
|              | Groundwater<br>µg/L  | Low Soil/ Sediment<br>µg/Kg <sup>b</sup> |
| Aroclor-1242 | 0.5                  | 80.0                                     |
| Aroclor-1248 | 0.5                  | 80.0                                     |
| Aroclor-1061 | 0.5                  | 80.0                                     |
| Aroclor-1221 | 0.5                  | 80.0                                     |
| Aroclor-1232 | 0.5                  | 80.0                                     |
| Aroclor-1254 | 1.0                  | 160.0                                    |
| Aroclor-1260 | 1.0                  | 160.0                                    |

## NOTES:

- \* Quantitation limits listed for soil/sediment are based on wet weight. The quantitation limits calculated by the laboratory for soil/sediment, calculated on dry weight basis as required by the contract, will be higher.
- <sup>b</sup> Medium Soil/Sediment Contract Required Quantitation Limits (CRQL) for Volatile TCL Compounds are 125 times the individual Low Soil/Sediment CRDL.
- \* Specific quantitation limits are highly matrix dependent. The quantitation limits listed herein are provided for guidance and may not always be achievable.

SOURCE: Statement of Work for Organic Analysis Multi-Media Multi-Concentration SOW 2/88, Revisions 9/88, 4/89 and 5/89, Office of Solid Waste and Emergency Response, U.S. Environmental Agency, Washington, D.C., May 1989.

**TABLE 4**  
**TARGET ANALYTE LIST (TAL) INORGANICS**

| Analyte   | Contract Required Detection Limits*<br>( $\mu\text{g/l}$ ) |
|-----------|--|
| Aluminum  | 200  |
| Antimony  | 60   |
| Arsenic   | 10   |
| Barium    | 200  |
| Beryllium | 5  |
| Cadmium   | 5  |
| Calcium   | 5000   |
| Chromium  | 10   |
| Cobalt    | 50   |
| Copper    | 25   |
| Iron      | 100  |
| Lead      | 3  |
| Magnesium | 5000   |
| Manganese | 15   |
| Mercury   | 0.2  |
| Nickel    | 40   |
| Potassium | 5000   |
| Selenium  | 5  |
| Silver    | 10   |
| Sodium    | 5000   |
| Thallium  | 10   |
| Vanadium  | 50   |
| Zinc      | 20   |
| Cyanide   | 10   |

## NOTE:

- \* The reporting limits are instrument detection limits obtained in pure water. The detection limits for samples may be considerably higher depending on the sample matrix.

SOURCE: Statement of Work for Inorganic Analysis Multi-Media Multi-Concentration SOW No. 788, Revisions 2/89 and 6/89, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency

**TABLE 5**  
**DETECTION LIMITS FOR METALS<sup>1</sup>**

| Metal     | Nominal Water Detection Limit, mg/L |            |          |        |
|-----------|-------------------------------------|------------|----------|--------|
|           | Flame AA                            | Furnace AA | Other AA | ICP    |
| Aluminum  | 0.1                                 | 0.003      | --       | 0.05*  |
| Antimony  | 0.2                                 | 0.002**    | --       | 0.30*  |
| Arsenic   | 0.5                                 | 0.002*     | 0.002    | 0.05*  |
| Barium    | 0.1                                 | 0.002      | --       | 0.005* |
| Beryllium | 0.002                               | 0.0001     | --       | 0.001* |
| Cadmium   | 0.005                               | 0.0001**   | --       | 0.002* |
| Calcium   | 0.01                                | --         | --       | 0.01*  |
| Chromium  | 0.05                                | 0.001      | --       | 0.005* |
| Cobalt    | 0.05                                | 0.001      | --       | 0.003* |
| Copper    | 0.02                                | 0.001      | --       | 0.002* |
| Iron      | 0.03                                | 0.001      | --       | 0.01*  |
| Lead      | 0.1                                 | 0.001*     | --       | 0.02   |
| Magnesium | 0.05                                | 0.001      | --       | 0.01*  |
| Manganese | 0.01                                | 0.0002     | --       | 0.005* |
| Mercury   | --                                  | --         | 0.00002  | --     |
| Nickel    | 0.01                                | 0.001      | --       | 0.01*  |
| Potassium | 0.001                               | --         | --       | 0.3*   |
| Selenium  | --                                  | 0.002*     | 0.002    | 0.075  |
| Silver    | 0.01                                | 0.0001**   | --       | 0.003* |
| Sodium    | 0.002                               | --         | --       | 0.5*   |
| Thallium  | 0.1                                 | 0.001*     | --       | 0.040  |
| Tin       | 1                                   | 0.05       | --       | 0.03*  |
| Vanadium  | 0.2                                 | 0.004      | --       | 0.002* |
| Zinc      | 0.005                               | 0.00005    | --       | 0.004* |

## NOTES:

\* Recommended method for analyses (RMAL).

\*\* More sensitive method sometimes used.

<sup>1</sup> Based upon SW846, 3rd Edition Methods.

TABLE 6

PRECISION, ACCURACY, AND COMPLETENESS OBJECTIVES

| Measurement Parameters   | Experimental Conditions          | Surrogate Percent Recovery     | Precision (Relative Percent Difference)  | Accuracy (Percent Recovery)   | Completeness (Percent) | Other EPA CLP Control Limits   |
|--|----------------------------------|--------------------------------|--|---|------------------------|--|
| Volatile (Purgeable) Organic Target Compounds <sup>1</sup>                 | Spike and unspiked field samples | Compound Specific <sup>2</sup> | Compound Specific <sup>3</sup>   | Compound Specific <sup>3</sup>  | 90                     | Laboratory Blank: ±D.L.<br>Laboratory Duplicate: ±35% RPD<br>Initial Calibration: RRF <sup>(6)</sup> > .05 and ≤ 25% D <sup>(6)</sup><br>Continuing Calibration: >.05 RRF and ≤ 25% D <sup>(6)</sup><br>Internal Standard GC/MS: -50 to + 100% |
| Semivolatile (Base/Neutral and acid) Organic Target Compounds <sup>1</sup> | Spike and unspiked field samples | Compound Specific <sup>2</sup> | Compound Specific <sup>3</sup>   | Compound Specific <sup>3</sup>  | 90                     | Laboratory Blank: ±D.L.<br>Laboratory Duplicate: ±35% RPD<br>Initial Calibration: RRF <sup>(6)</sup> > .05 and ≤ 30% D <sup>(6)</sup><br>Continuing Calibration: >.05 RRF and ≤ 25% D <sup>(6)</sup><br>Internal Standard GC/MS: -50 to + 100% |
| Pesticides and PCBs <sup>1</sup>   | Spike and unspiked field samples | Compound Specific <sup>2</sup> | Compound Specific <sup>3</sup>   | Compound Specific <sup>3</sup>  | 90                     | Laboratory Blank: ±D.L.<br>Laboratory Duplicate: ±35% RPD<br>Initial Calibration: 10% RSD<br>Continuing Calibration: 15 or 20% RSD<br>Internal Standard GC/MS: < 20%   |
| Mercury <sup>4</sup>   | Spike and unspiked field samples |                                | ±20 percent provided both sample and duplicate greater than 5 times CRDL<br><br>±CRDL if either sample or duplicate less than CRDL | 75 to 125 percent unless the sample exceeds the spike concentration by a factor of four or more<br><br>Not calculated if sample concentration exceeds spike concentration by a factor of four or more | 90                     | Calibration Blank: ±D.L.<br>Calibration Verification: 80-120%<br>Preparation Blank: ±D.L.<br>Duplicate Sample Analysis: ±D.L. or 20% RPD<br>Lab QC Sample Analysis: 80-120%  |
| Cyanide Total <sup>4</sup>   | Spike and unspiked field samples |                                | ±20 percent provided both sample and duplicate greater than 5 times CRDL<br><br>±CRDL if either sample or duplicate less than CRDL | 75 to 125 percent unless the sample exceeds the spike concentration by a factor of four or more   | 90                     | Calibration Blank: ±D.L.<br>Calibration Verification: 85-115%<br>Preparation Blank: ±D.L.<br>Duplicate Sample Analysis: ±D.L. or 20% RPD<br>Lab QC Sample Analysis: 80-120%  |

WOODWARD-CLYDE

TABLE 6 (Continued)

PRECISION, ACCURACY, AND COMPLETENESS OBJECTIVES

| Measurement Parameters  | Experimental Conditions          | Surrogate Percent Recovery | Precision (Relative Percent Difference)  | Accuracy (Percent Recovery)   | Completeness (Percent) | Other EPA CLP Control Limits  |
|---|----------------------------------|----------------------------|--|---|------------------------|---|
| Target Analyte List (TAL) Metals Other than Mercury <sup>4</sup>                                      | Spike and unspiked field samples |                            | ±20 percent provided both sample and duplicate greater than 5 times CRDL<br><br>±CRDL if either sample or duplicate less than CRDL | 75 to 125 percent unless the sample exceeds the spike concentration by a factor of four or more<br><br>Not calculated if sample concentration exceeds spike concentration by a factor of four or more | 90                     | Calibration Blank: ±D.L.<br>Calibration Verification: 90-110%<br>Preparation Blank: ±D.L.<br>Duplicate Sample Analysis: ±D.L. or 20% RPD<br>Lab QC Sample Analysis: 85-115% |
| Restricted Target Analyte List (TAL) Metals <sup>4</sup><br><br>Calcium, Magnesium, Potassium, Sodium | Unspiked field samples           |                            | ±20 percent provided both sample and duplicate greater than 5 times CRDL<br><br>±CRDL if either sample or duplicate less than CRDL | Not applicable. Matrix spikes not employed with these analytes.   | 90                     | Calibration Blank: ±D.L.<br>Calibration Verification: 90-110%<br>Preparation Blank: ±D.L.<br>Duplicate Sample Analysis: ±D.L. or 20% RPD<br>Lab QC Sample Analysis: 85-115% |

Woodward-Clyde

**TABLE 8**  
**SURROGATE SPIKE RECOVERY LIMITS**

| Analytical Fraction | Surrogate Compound                | Recovery Limits (%) |
|---------------------|-----------------------------------|---------------------|
| Volatile            | 4-Bromofluorobenzene              | 86 - 115            |
|                     | 1,2-Dichloroethane-d <sub>4</sub> | 76 - 114            |
|                     | Toluene-d <sub>8</sub>            | 88 - 110            |
| Base/Neutral        | Nitrobenzene-d <sub>5</sub>       | 35 - 114            |
|                     | 2-Fluorobiphenyl                  | 43 - 116            |
|                     | p-Terphenyl-d <sub>14</sub>       | 33 - 141            |
| Acid                | Phenol-d <sub>6</sub>             | 10 - 94             |
|                     | 2-Fluorophenol                    | 21 - 100            |
|                     | 2,4,6-Tribromophenol              | 10 - 123            |
| Pesticide           | Dibutylchlorodate <sup>1</sup>    | 24 - 15             |

**NOTE:**

<sup>1</sup> Recovery limits are for advisory purposes only. They are not used to determine if a sample should be reanalyzed.

**SOURCE:**

Statement of Work for Organic Analysis Multi-Media Multi-Concentration SOW 2/88, Revisions 9/88, 4/89 and 5/89, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C., May 1989.

TABLE 9

**MATRIX SPIKE RECOVERY AND RELATIVE  
PERCENT DIFFERENCE CONTROL LIMITS**

| Analytical Category | Matrix Spike Compound      | Relative Percent Difference | Recovery Limits (%) |
|---------------------|----------------------------|-----------------------------|---------------------|
| Volatile            | 1,1-Dichloroethene         | 14                          | 61 - 145            |
|                     | Trichloroethene            | 14                          | 71 - 120            |
|                     | Chlorobenzene              | 13                          | 75 - 130            |
|                     | Toluene                    | 13                          | 76 - 125            |
|                     | Benzene                    | 11                          | 76 - 127            |
| Base/Neutral        | 1,2,4-Trichlorobenzene     | 28                          | 39 - 98             |
|                     | Acenaphthene               | 31                          | 46 - 118            |
|                     | 2,4-Dinitrotoluene         | 38                          | 24 - 96             |
|                     | Di-n-Butylphthalate        | 40                          | 11 - 117            |
|                     | Pyrene                     | 31                          | 26 - 127            |
|                     | N-Nitroso-Di-n-Propylamine | 38                          | 41 - 116            |
| Acid                | 1,4-Dichlorobenzene        | 28                          | 36 - 97             |
|                     | Pentachlorophenol          | 50                          | 9 - 103             |
|                     | Phenol                     | 42                          | 12 - 89             |
|                     | 2-Chlorophenol             | 40                          | 27 - 123            |
|                     | 4-Chloro-3-Methylphenol    | 42                          | 23 - 97             |
| Pesticide           | 4-Nitrophenol              | 50                          | 10 - 80             |
|                     | Lindane                    | 15                          | 56 - 123            |
|                     | Heptachlor                 | 20                          | 40 - 131            |
|                     | Aldrin                     | 22                          | 40 - 120            |
|                     | Dieldrin                   | 18                          | 52 - 126            |
|                     | Endrin                     | 21                          | 56 - 121            |
|                     | 4,4'-DDT                   | 27                          | 38 - 127            |

SOURCE: Statement of Work for Organic Analysis Multi-Media Multi-Concentration SOW 2/88, Revisions 9/88, 4/89 and 5/89, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C., May 1989.

TABLE 10

**FIELD QUALITY CONTROL SAMPLE FREQUENCY  
GROUNDWATER MONITOR WELLS<sup>1</sup>**

| <b>Matrix</b>        | <b>Field Duplicate</b> | <b>Rinsate Blank</b> | <b>Trip Blank<sup>2</sup></b> | <b>MS/MSD<sup>3</sup></b> |
|----------------------|------------------------|----------------------|-------------------------------|---------------------------|
| Groundwater          | 1                      | 1                    | 1                             | 1                         |
| Analytical Parameter | All Parameters         | VOA and Semivolatile | VOA                           | Spike                     |

## NOTES:

- <sup>1</sup> There are less than 20 monitor wells. A sampling event or sample delivery group shall consist of a groundwater sample from each well plus the 5 quality control samples.
- <sup>2</sup> Trip blanks will be prepared by the laboratory and shipped with the sample containers. One trip blank will be kept with the collected samples and shipped back to the laboratory in the last shipment.
- <sup>3</sup> Matrix Spiked/Matrix Spiked Duplicate samples will be spiked in the laboratory.

**FIGURES**

**FIGURES**

LOG OF BORING

PROJECT:  
 LOCATION:  
 CLIENT:  
 DRILLER:

BORING:  
 FILE: 01234  
 DATE:  
 TECHNICIAN:  
 APPROVED:  
 PAGE: 1 of 1

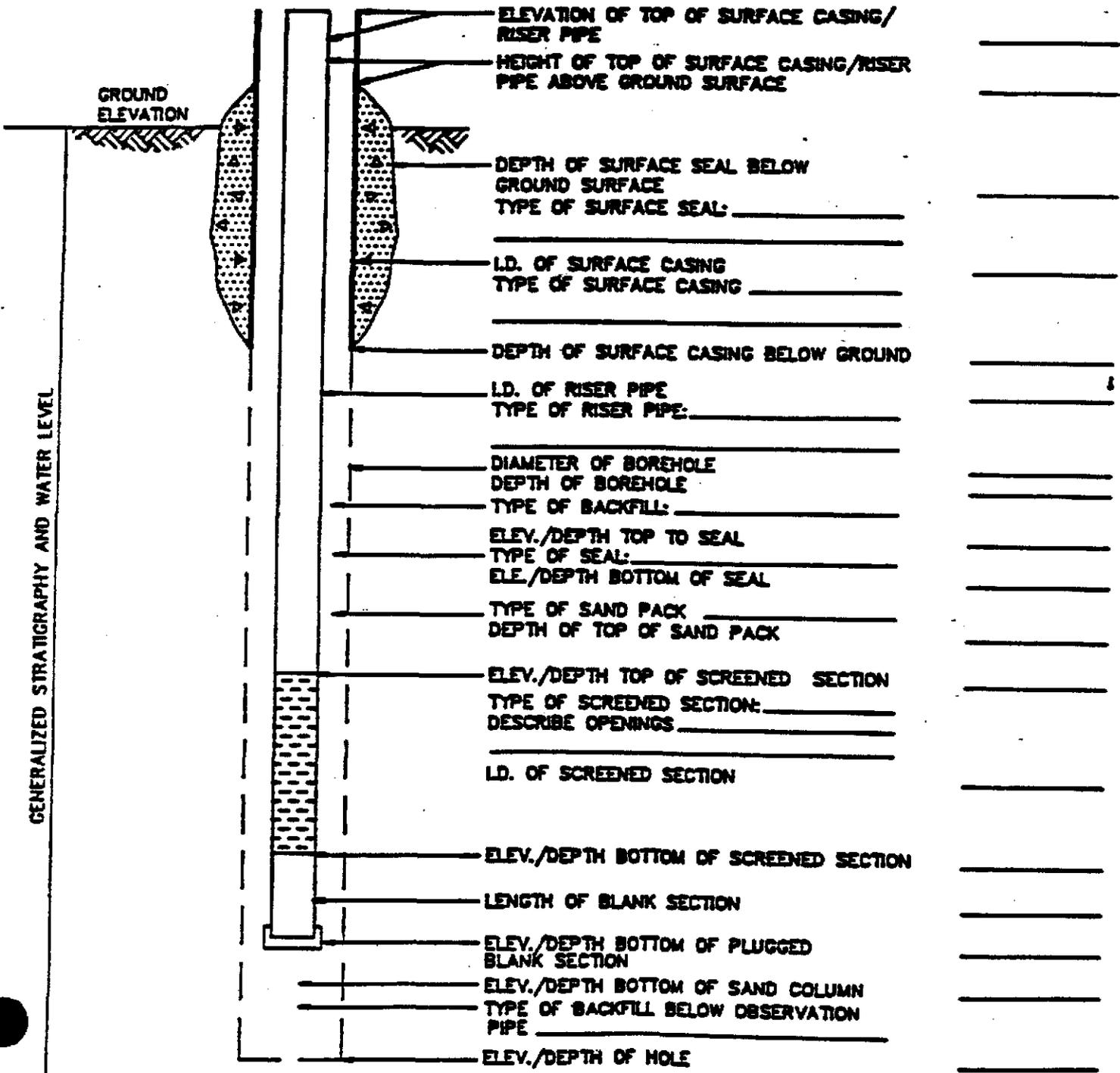
| DEPTH<br>(FEET) | SYMBOL<br>SAMPLE | S.P.T. (b/f)<br>or<br>P.Pez. (tsf) | OVA<br>(ppm) | Recovery<br>(inch) | Description of Stratum |
|-----------------|------------------|------------------------------------|--------------|--------------------|------------------------|
|                 |                  |                                    |              |                    |                        |
| 0               |                  |                                    |              |                    |                        |
| 5               |                  |                                    |              |                    |                        |
| 10              |                  |                                    |              |                    |                        |
| 15              |                  |                                    |              |                    |                        |
| 20              |                  |                                    |              |                    |                        |
| 25              |                  |                                    |              |                    |                        |
| 30              |                  |                                    |              |                    |                        |
| 35              |                  |                                    |              |                    |                        |
| 40              |                  |                                    |              |                    |                        |

FIGURE 1



# MONITOR WELL INSTALLATION REPORT

PROJECT \_\_\_\_\_ PAGE \_\_\_\_\_ OF \_\_\_\_\_  
 LOCATION \_\_\_\_\_ WELL NO. \_\_\_\_\_  
 DATE COMPLETED \_\_\_\_\_ ORIGINAL DEPTH \_\_\_\_\_ AQUIFER \_\_\_\_\_  
 INSPECTED BY \_\_\_\_\_ DATE \_\_\_\_\_  
 CHECKED BY \_\_\_\_\_ DATE \_\_\_\_\_ DEPTH INTERVAL \_\_\_\_\_



- \_\_\_\_\_ ELEVATION OF TOP OF SURFACE CASING/  
RISER PIPE
- \_\_\_\_\_ HEIGHT OF TOP OF SURFACE CASING/RISER  
PIPE ABOVE GROUND SURFACE
- \_\_\_\_\_ DEPTH OF SURFACE SEAL BELOW  
GROUND SURFACE  
TYPE OF SURFACE SEAL: \_\_\_\_\_
- \_\_\_\_\_ I.D. OF SURFACE CASING  
TYPE OF SURFACE CASING \_\_\_\_\_
- \_\_\_\_\_ DEPTH OF SURFACE CASING BELOW GROUND
- \_\_\_\_\_ I.D. OF RISER PIPE  
TYPE OF RISER PIPE: \_\_\_\_\_
- \_\_\_\_\_ DIAMETER OF BOREHOLE  
DEPTH OF BOREHOLE \_\_\_\_\_  
TYPE OF BACKFILL: \_\_\_\_\_
- \_\_\_\_\_ ELEV./DEPTH TOP TO SEAL  
TYPE OF SEAL: \_\_\_\_\_  
ELEV./DEPTH BOTTOM OF SEAL \_\_\_\_\_
- \_\_\_\_\_ TYPE OF SAND PACK \_\_\_\_\_  
DEPTH OF TOP OF SAND PACK \_\_\_\_\_
- \_\_\_\_\_ ELEV./DEPTH TOP OF SCREENED SECTION  
TYPE OF SCREENED SECTION: \_\_\_\_\_  
DESCRIBE OPENINGS \_\_\_\_\_
- \_\_\_\_\_ I.D. OF SCREENED SECTION \_\_\_\_\_
- \_\_\_\_\_ ELEV./DEPTH BOTTOM OF SCREENED SECTION \_\_\_\_\_
- \_\_\_\_\_ LENGTH OF BLANK SECTION \_\_\_\_\_
- \_\_\_\_\_ ELEV./DEPTH BOTTOM OF PLUGGED  
BLANK SECTION \_\_\_\_\_
- \_\_\_\_\_ ELEV./DEPTH BOTTOM OF SAND COLUMN  
TYPE OF BACKFILL BELOW OBSERVATION  
PIPE \_\_\_\_\_
- \_\_\_\_\_ ELEV./DEPTH OF HOLE \_\_\_\_\_

FIGURE 2

# GROUND WATER COLLECTION REPORT

PROJECT NUMBER AND NAME \_\_\_\_\_ LOCATION \_\_\_\_\_  
 COLLECTOR/OPERATOR \_\_\_\_\_ WELL NO. \_\_\_\_\_  
 TYPE OF SAMPLE \_\_\_\_\_ ( ) GRAB ( ) COMPOSITE ( ) OTHER \_\_\_\_\_  
 METHOD OF SAMPLING IF OTHER THAN MONITOR WELL \_\_\_\_\_ SHUTTLE NO. \_\_\_\_\_

## MONITOR WELL INFORMATION

EVACUATION: DATE/TIME \_\_\_\_\_ METHOD OF EVACUATION \_\_\_\_\_  
 INITIAL DEPTH TO WATER LEVEL \_\_\_\_\_ TOP OF CASING TO BOTTOM \_\_\_\_\_  
 GALLONS PER WELL VOLUME \_\_\_\_\_ TOTAL GALLONS EVACUATED \_\_\_\_\_  
 FINAL DEPTH TO WATER \_\_\_\_\_ ELEVATION TOP OF CASING \_\_\_\_\_

SAMPLING: DATE/TIME \_\_\_\_\_ METHOD OF SAMPLING \_\_\_\_\_  
 DEPTH TO WATER LEVEL \_\_\_\_\_

## SAMPLE DATA

|                    |             |          |                    |
|--------------------|-------------|----------|--------------------|
| FIELD REPLICATE #1 | TEMP. _____ | pH _____ | CONDUCTIVITY _____ |
| FIELD REPLICATE #2 | TEMP. _____ | pH _____ | CONDUCTIVITY _____ |
| FIELD REPLICATE #3 | TEMP. _____ | pH _____ | CONDUCTIVITY _____ |
| FIELD REPLICATE #4 | TEMP. _____ | pH _____ | CONDUCTIVITY _____ |

## GENERAL INFORMATION

WEATHER CONDITIONS AT TIME OF SAMPLING \_\_\_\_\_  
 SAMPLING CHARACTERISTICS \_\_\_\_\_  
 CONTAINERS AND PRESERVATIVES \_\_\_\_\_

RECOMMENDATIONS \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

SAMPLING PERSONNEL \_\_\_\_\_ TIME \_\_\_\_\_ TO \_\_\_\_\_  
 \_\_\_\_\_ DATE \_\_\_\_\_  
 (SIGNED)

LOCK OR SERIAL NUMBER \_\_\_\_\_ REPLACEMENT SERIAL NUMBER \_\_\_\_\_





**RFI DATA MANAGEMENT PLAN**

**VICKSBURG CHEMICAL COMPANY  
VICKSBURG, MISSISSIPPI**

Prepared for  
*Vicksburg Chemical Company*  
Vicksburg, Mississippi

June 1996

WCC File 92B007C-3003

**Woodward-Clyde** 

Woodward-Clyde Consultants  
2822 O'Neal Lane  
Baton Rouge, Louisiana 70816

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**DATA MANAGEMENT PLAN**

---

**1.1 INTRODUCTION**

During the RCRA Facility Investigation (RFI), various types of data will be generated. At a minimum, data gathered will consist of field data sheets, field log books, boring logs, chemical data from analysis of soil and groundwater, field parameter measurements, maps and drawings. This Data Management Plan describes procedures that will be used to physically manage project related information. The Data Management Plan addresses:

- Project organization and responsibilities
- Technical approach to data management
- Flow of data (tracking)
- Data validation and reduction
- Data presentation

**PROJECT ORGANIZATION AND RESPONSIBILITIES**

---

A description of primary project personnel and their responsibilities is presented below. Changes in procedures presented below will be documented.

**2.1 AUTHORITY AND RESPONSIBILITIES**

**2.1.1 Project Manager**

Richard D. Karkkainen, Woodward-Clyde Consultants (WCC), Vice President and Principal, will serve as Project Manager. The Project Manager will be the prime contact with Mr. Steve Boswell, the Vicksburg Chemical Company (VCC) Project Director and official representative for VCC, concerning all the work that is done by WCC. Project organization and management procedures will be established by the Project Manager, including reviews and approval of work scope, budget, schedules and reports. The Project Manager will also direct financial reporting and subcontractor recommendations for VCC's approval.

**2.1.2 Site Coordinator**

The Site Coordinator's primary responsibility is to oversee all field phases of the RFI activities under the direction of the Project Manager. Additionally, the Site Coordinator will monitor quality assurance in the field.

**2.1.3 Task Leaders**

The task leader for data management validation and analytical services is Dr. Charles Westerman. He will be assisted by Anna Saucier.

**2.2 PROJECT COMMUNICATIONS**

**2.2.1 Record Control**

The control of records provides for the flow of information both internal and external to WCC.

Following receipt of information from external sources, completion of analyses, and issuance of reports or other transmittals; associated records shall be submitted to the WCC office central project files. This shall include any records generated for WCC by subcontractors. Records shall be legible and easily identifiable. In addition, field records and records transmitted between WCC and contractor offices shall be adequately protected from damage and loss during transfer (e.g., hand carrying or making copies prior to shipment).

Field records, laboratory data summaries, numerical calculations, reports and other data transmittals, copies of proposals, purchase orders, contracts, correspondence, memorandums, telephone records, photographs, and reference material shall be transferred to the project central file.

Records submitted to the project central file, with the exception of correspondence, should be bound, placed in folders or binders, or otherwise secured for filing.

**2.2.2 Record Status**

All individuals on the Project Staff shall be responsible for reporting obsolete or superseded project-related information to the Project Manager on a periodic basis. In turn, the Project Manager shall notify the Project, Laboratory Staff, and Quality Assurance personnel of the resulting status change in project documents, such as drawings and project procedures. Notification of personnel of status changes in quality assurance procedures shall be the responsibility of the Project Manager.

In general, outdated drawings and other documents shall be marked "void." Any copy of void documents maintained for the project files shall state the reasons for and date of voiding.

To denote that calculations, drawings, and other material which have not been formally checked are preliminary, they shall be marked "preliminary".

### **2.2.3 Record Retention**

Information associated with the project shall be retained in the WCC office central project files. These files will include the following:

- Project central file (project material except drawing originals, records related to laboratory analysis)
- Original drawing file
- Generic quality assurance file

Project records shall be received at the various storage areas by designated personnel. Designated personnel shall check that incoming records have proper identification for filing, are legible, and are in suitable condition for storage. Indexing and filing of records shall be performed only by the designated personnel.

For the project central file, the individual file folders shall be divided into appropriate categories based on content and numbered and filed sequentially within each category.

A numbered index for the project central file shall list the individual file folders and identify the records therein to facilitate locating the records. The index shall be kept in a separate folder at the front of the project file. If appropriate, information on project material not stored in the project central file should be included with the index.

For the original drawing and quality assurance files, all material shall be filed only by project number.

The record storage in the central files shall utilize facilities that provide a suitable environment to minimize deterioration or damage and that prevent loss. The facilities shall, where possible, have controlled access and shall provide protection from excess moisture and temperature extremes. Records shall be secured in binders, placed in folders or envelopes, or otherwise secured for storage in containers (e.g., steel file cabinets).

Storage systems shall provide for the prompt retrieval of information for reference or use outside the storage areas. For the project central file, sign out sheets shall be maintained so that a record of files removed is available.

#### **2.2.4 Onsite Records**

Appropriate requirements for the field control and retention of records generated as a result of site investigation, sampling, and testing shall be followed. Upon completion of the field program or program phase, onsite files will be transferred to, and integrated with, the WCC office central project files.

#### **2.2.5 Change Control**

It is imperative that the status of work items be up-to-date. A status system includes:

- Formal document and design drawing revision
- Nonconformance identification, documentation, and reporting
- Change documentation and approval

Change from original design documents, procedures, and specifications must be expected. Change does not imply a nonconformance to the work, but simply means that original plans must be altered because of information or events that occur during the work.

Change must be documented, evaluated, and reported as necessary. It is necessary to manage change so that the actual course of the project, not the original plan, can be demonstrated and justified. Changes must be documented so that the actual course of work is known and the effect of the change upon the course of work can be evaluated.

It is the responsibility of project personnel to appropriately record the change and to make the documentation available as appropriate to project or laboratory management. The effect of the change upon the project shall be evaluated by the project or laboratory management, quality assurance personnel, and/or subcontractor management.

Review and written approval for changes which affect the project activities should be provided by the Project Manager. Following the review and approval process, notification of the change should be made to appropriate personnel and affected documents revised as necessary to reflect the work as actually performed.

Project documents and design drawings must be reviewed, approved, distributed, and revised as necessary. This control will provide approved, up-to-date information and drawings.

**PRINCIPLES OF DATA MANAGEMENT**

---

**3.1 GENERAL PRINCIPLES**

Three major approaches to database design are the Network, the Hierarchical and the Relational approaches. These three approaches have their respective strengths and weaknesses and in some applications, one approach is more suited than the others. Of the three methods, the relational approach is gaining momentum in the database market and is used in various applications. Because of its popularity, versatility, ease of use and the availability of many commercial relational database packages, WCC has chosen the relational approach for its design of the VCC database.

In the relational approach, the information is stored in tables and columns. A table is called a relation and columns are the attributes of the relation. A good relational design of a database management system minimizes data redundancy, maintains data consistency and ensures data integrity. Data redundancy refers to the storing of the same information in multiple tables. Redundancy can rarely be totally eliminated but can be reduced. Data consistency refers to maintaining redundant data in the same form at all locations in the system. That is, if data is changed at one location, the system should propagate similar changes in that data in other related tables. This action ensures the integrity of the data in the database.

**3.2 OBJECTIVES OF THE SYSTEM**

The data management, as defined herein for this project, refers to the actual management of the data, but also includes data validation. The RFI Data Collection Quality Assurance Plan deals with data validation procedures. WCC has identified the following objectives for effectively managing the field data and the laboratory results data from the VCC site:

- Store and organize all field, analytical and other data.
- Track the samples for extraction and analysis holding time deadlines.

- Validate the analytical results pursuant to the RFI Data Collection Quality Assurance Plan.
- Make provisions for transmission of data to VCC.

**TECHNICAL APPROACH**

---

The objectives are accomplished through a data management, validation and analytical services task leader.

**4.1 DATA MANAGEMENT**

The task leader is responsible for the following:

- Utilize a system to store and organize all field and analytical data.
- Establish procedures to follow as the data arrives from the field and the laboratory.
- Produce tables for reports to VCC, regulatory agencies and other appropriate groups.
- Maintain and administer the system utilized.

The need to use an organized system which facilitates easy and instant access to the information desired, is obvious because a large volume of data is generated by this project. Establishment of procedures streamline the operation of data collection, organization and presentation.

**4.2 DATA VALIDATION**

The task leader is responsible for the following:

- Review the QA/QC information for the samples.
- Validate the analytical results pursuant to the RFI Data Collection Quality Assurance Plan.
- Contact the laboratory, if inconsistencies exist.
- Interface with the data management system.
- Maintain records.

WCC utilizes Site Manager Pro (SMPro), a database management application used to expedite the processes involved in administering chemical and geological/soil sampling. It is a PC-based Windows application that runs locally on the PC. It uses client-server technology to access project data residing on a local or remote database server. The client-server technology enable SMPro to consolidate project data into a centralized storage place to be accessed by multiple users.

SMPro includes seven menu options from the main window. WCC will utilize SMPro on this project to the extent it enhances the efficiency of the overall project. The menu items contain options from which users access the necessary selections to complete their tasks. The main menu categories are the following:

- **File**  
Allows user access to log in and exit SMPro.
  
- **Project**  
Allows chemical and geological users to set up the structure of their sampling program. The project module includes options for choosing a project, creating and updating a project chemical list, indicating sites and locations for sampling, creating geological data entry forms, and creating lookups for expediting data entry. It also includes a customized data-importing feature.
  
- **Chemical**  
Allows users to print out chain of custodies, worksheets and sample bottle labels, enter field and lab data, track the process of sending samples to the lab, electronically and manually enter data, and examine and edit the analytical data returned from the lab.

- **Geological**  
Allows users to expedite and standardize the record keeping of geological data. Geo/Field tests are recorded here, e.g., water levels, temperatures, pH, and conductivity.
  
- **Query**  
Allows users to query both chemical and geological data according to specific criterion. With Advanced Query, users can bridge across chemical and geological fields and obtain both types of data. With Quick query, users can query either basic chemical or geological information. Query results can be exported to Excel, CSV, Lotus, SYLK, DBF, and DIF formats.
  
- **Window**  
Allows users to access and arrange operative windows and icons to suit their viewing needs. Windows information is included in the Navigating section.
  
- **Utilities**  
System administrators use this option to set up and maintain system default tables, create new projects, add new users to the system and give them access privileges, and update the SMPPro program. Utilities information is included in the Appendix B hard-copy document.

## **5.1 PROJECT MENU**

The following paragraphs include a brief overview of each of the topics within the Project menu.

### **Choose Project**

The Project menu option is the first section of the menu that a general user accesses when starting work on a project. Users begin by indicating the project on which they will work and viewing their access privileges.

**Chemical List**

The Project Chemical List lists all the unique methods, chemicals, and CAS numbers associated with a project.

**Site/Locations**

Each project requires a summary list of all sites and/or locations that will be or have been sampled or bored. The site/location combination forms a unique identifier for both chemical and geological sampling points. In addition to identifying sampling locations, the site/location identifiers are used to query data by a given site/location. The site/location list with its corresponding X, Y, Z fields provides the location information for exporting project data to mapping software.

**Lookups**

Lookups consist of data commonly used in projects and are used to expedite entering data into the system. Examples of lookups include Sample Types, QA/QC Types, and Laboratory Names.

**Data Entry Forms**

For users working on a project requiring geological data input and collection, the Data Entry Forms option allows them to create their forms, including the fields and site/locations to be included on each geological sampling data form.

**Import Data Exchange File**

Data Exchange File is an ASCII text file allowing data to be imported into the current project from a database site to another database site. Users can also import information into any of the SMPro tables if the file is in the syntax required by SMPro.

### **Update Project Chemical List**

With this feature, the project administrator can create/update the project chemical list from data obtained from the lab.

### **Project Status**

The *Project Status* option allows both chemical and geological project users to access numerical summaries for their project's major fields. Project managers may use this function to track their project's progress, e.g., a quick counting of the fields.

## **5.2 CHEMICAL MENU**

The Chemical menu consists of four options: *Sampling Plan*, *Chain of Custody*, *Data Entry*, and *Data Production*. The following information contains a synopsis of tasks related to the Chemical menu options.

### **Sampling Plan**

Sampling plan tasks include entering header information such as site, location, and field ID. It also includes information such as lab(s) that will be used to analyze the sample, requested methods of analysis, and containers used for holding the samples.

After the sampling plan is completed, users print the plan that will then serve as worksheets for field technicians. They can also print bottle labels to identify the sampling containers.

### **Chain of Custody (COC)**

The COC efforts take place either during or after collecting the samples. COC efforts involve entering the project's field sample data from the worksheets completed at the sampling site and preparing the samples to be sent to the lab for evaluation. COCs are chronologically generated by selecting samples from the sampling plan as they are sampled in the field. This information is recorded at the end of each day. COC numbers used for tracking purposes may be generated in the module. Quality Assurance and Quality Control

(QAQC) coverage is assigned to samples collected at the sampling site. Reports are available for tracking samples, COCs, and field QAQC coverage. To help maintain accuracy and validity, a COC audit trail records all changes made to the production status chemical data. COCs can be exported between hub and stand-alone sites.

### **Production Chemical Data**

Data that are in production status are available for editing in this module. They include the analytical data from the lab that have been sent back to be loaded into SMPro. The production data are used in reports.

### **Data Entry**

With the Data Entry module, users can enter chemical analysis data received from the lab either electronically (from a disk delivered by the lab) or manually (by typing it in from lab deliverables). Data that are loaded both manually or electronically are initially logged as having data entry status. A user entering the data moves the data to production status when the new data entry is completed and checked.

## **5.3 GEOLOGICAL MENU**

The Geological menu contains only the Production option, mostly included as a place holder for accessing geological data. Geological data are placed into production mode after they have been entered and have passed SMPro's field characteristics checks.

## **5.4 QUERY MENU**

The Query menu consists of the Quick Query and the Advanced Query options. These options allow users to examine chemical and geological data by selecting the fields to include in the report output and then indicating selection (search) criteria (i.e., sites, locations, field IDs, and chemicals).

The quick and advanced queries have many similar characteristics. Fields available in the query process are identical. Queries can be saved to a file and loaded and run at a later time.

The query results can be sorted (placed in a different order according to specified characteristics), filtered, and grouped within the query module.

### **Quick Query**

Quick Query allows users to define a query for chemical modules or geological modules separately. Module queries cannot be interrelated. Quick Query can query information across projects and has predefined selection (search) criteria such as location, field ID, and chemical group from which to choose.

### **Advanced Query**

Advanced Query allows users to define a combined query for chemical and geological data. Because it can take into account both chemical and geological simultaneously, the process involved in setting up the query is different from that of the simple query.

The Advanced Query includes a special criteria option that allows users to enter more specific selection (search) criteria than in Quick Query.

## **5.5 WINDOW MENU**

The Window menu option is a standard Microsoft Windows feature that allows users to arrange active windows in a manner suiting their purposes so they can move easily between them.

## **5.6 UTILITIES MENU**

The Utilities menu option is used only by system administrators to maintain system operation.

TABLE 1

VICKSBURG CHEMICAL COMPANY  
 SCHEDULE OF COMMUNITY RELATIONS ACTIVITIES

| Community Relations Activity        | During RFI | Completion of RFI | During CMS | Proposed Plan Announced | Corrective Action Activities |
|-------------------------------------|------------|-------------------|------------|-------------------------|------------------------------|
| To Establish Information Repository | X          | X                 | X          | X                       | X                            |
| Summary Paper                       |            | X                 |            | X                       |                              |
| Publish Public Notice               |            |                   |            | X                       |                              |
| Contact Local Officials             |            |                   |            |                         |                              |
| Distribute Fact Sheets              | X          | X                 |            | X                       |                              |
| Conduct Comment Period              |            |                   |            | X                       |                              |
| Public Meeting                      |            |                   |            |                         |                              |

Woodward-Clyde

**HEALTH AND SAFETY PLAN**

**VICKSBURG CHEMICAL CORPORATION  
VICKSBURG, MISSISSIPPI**

October 1993

**Woodward-Clyde Consultants** 

Consulting Engineers, Geologists, and Environmental Scientists  
2822 O'Neal Lane, Baton Rouge, LA 70896

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HEALTH AND SAFETY PLAN

---

Client: Vickburg Chemical Corporation  
Project: RFI Field Investigation, Groundwater Assessment, and Interim Measures  
Project Manager: Richard D. Karkkainen  
Project Number: 92B007C  
Date of Plan: Revised October 22, 1993  
Estimated Dates of Work: North Pond, October 25, 1993 through November 5, 1993, Additional Pending EPA and MSDEQ  
Expiration Date: Pending EPA and MSDEQ

1.1 HEALTH AND SAFETY PLAN APPROVALS

  
Richard D. Karkkainen  
Project Manager  
(504) 751-1873

10/22/93  
Date

  
Tanya Pawley  
Health and Safety Officer  
Baton Rouge Business Unit  
(318) 439-2683

10/22/93

  
Charles Self, C. I. H.  
Corporate Health and Safety Officer  
(318) 439-2683

10/22/93  
Date

This Health and Safety Plan establishes guidelines and requirements for the safety of field personnel during the conduct of the field activities associated with the referenced project. The specific activities addressed by this plan are defined in Section 3.0. All employees of Woodward-Clyde Consultants (WCC) involved in this project are required to abide by the provisions of this plan. They are required to read this plan and sign the attached Compliance Agreement.

The health and safety guidelines and requirements presented are based on a review of available information and an evaluation of potential hazards. This plan outlines the health and safety procedures and equipment required for activities at this site to minimize the potential for exposures of field personnel. This plan may be modified by the project manager, the corporate health and safety officer, and the Baton Rouge health and safety officer in response to additional information obtained regarding the potential hazards to field investigative personnel. This plan has been prepared for the exclusive use of WCC Personnel and WCC subcontractors. WCC liability is extended to WCC Personnel and WCC Subcontractors only.

## 2.1 KEY PERSONNEL

Project management will be handled out of the Baton Rouge Operating Unit of WCC. The following is a description of job responsibilities and authorities:

Project Manager: Richard D. Karkkainen

For this project, the Project Manager has the following responsibilities:

- To see that the project is performed in a manner consistent with the WCC Health and Safety Program.

- To have an approved Health and Safety Plan prepared and properly implemented for this project.
- To provide the Business Unit Health and Safety Officer with project information related to health and safety matters and development of the Health and Safety Plan.
- To implement the Health and Safety Plan.
- To insure compliance with the Health and Safety Plan by WCC and contractor personnel.
- To coordinate with the Business Unit Health and Safety Officer on health and safety matters.

The Project Manager has the authority to take the following actions:

- To determine matters relating to schedule, cost, and personnel assignments on hazardous waste management projects.
- To temporarily suspend field activities, if the health and safety of personnel are endangered, pending further consideration by the Business Unit Health and Safety Officer.
- To temporarily suspend an individual from field activities for infractions of Health and Safety Plan, pending further consideration by the Business Unit Health and Safety Officer.

Health and Safety Officer: Tanya Pawley

The Health and Safety Officer has the following responsibilities:

- To interface with the Project Manager as may be required in matters of health and safety.

- To approve a Health and Safety Plan for the project.
- To appoint or approve a Site Safety Officer to assist in implementing the Health and Safety Plan.
- To monitor compliance with the approved Health and Safety Plan.
- To assist the Project Manager in seeing that proper health and safety equipment is available for the project.
- To approve personnel to work on this site with regard to medical examinations and health and safety training.

The Health and Safety Officer has the authority to take the following actions:

- To suspend work or otherwise limit exposures to personnel, if a Health and Safety Plan appears to be unsuitable or inadequate.
- To direct personnel to change work practices, if they are deemed to be hazardous to health and safety of personnel.
- To remove personnel from the project, if their actions or condition endangers their health and safety or the health and safety of co-workers.

WCC Site Safety Officer: Yong Goh

The Site Safety Officer (SSO) has the following responsibilities:

- To direct health and safety activities on-site.
- To report safety-related incidents or accidents to the Project Manager and Business Unit Health and Safety Officer.

- To assist the Project Manager in all aspects of implementing the Health and Safety Plan.
- To maintain health and safety equipment on-site, as specified in Health and Safety Plan.
- To perform health and safety activities on-site, as specified in the Health and Safety Plan, and report results to the Project Manager and the Business Unit Health and Safety Officer.

The SSO has the authority to take the following actions:

- To temporarily suspend field activities, if the health and safety of personnel are endangered, pending further consideration by the Business Unit Health and Safety Officer.
- To temporarily suspend an individual from field activities for infractions of the Health and Safety Plan, pending further consideration by the Business Unit Health and Safety Officer.

WCC Corporate Health and Safety Officer: Charles Self

The WCC CHSO has the following responsibilities:

- Direct the implementation of the Health and Safety Program of the operating group and provide recommendations for improvement of the program.
- Coordinate health and safety activities of the operating units in the operating group.
- Determine need for project Health and Safety Plans.
- Review and approve Health and Safety Plans.

- **Monitor implementation of Health and Safety Plans.**
- **Investigation reports of incidents or accidents and report accidents or incidents to the CHSA and EVPP.**
- **Assist CHSA with employee health and safety training in the operating group.**
- **Determine whether an accidental exposure or injury merits a change in the affected individual's work assignments and whether changes in work practices are required.**
- **Coordinate business units with regard to health and safety equipment needs.**

**The WCC CHSO has the authority to take the following actions:**

- **Approve or disapprove Health and Safety Plans.**
- **Direct operating unit HSO to prepare project Health and Safety Plans.**
- **Access project files.**
- **Direct changes in personnel work practices to improve health and safety of employees involved in hazardous waste management projects.**
- **Remove individuals from projects, if their conduct jeopardized their health and safety or that of co-workers.**
- **Suspend work on any project that jeopardizes the health and safety of personnel involved.**

## **2.2 SITE LOCATION**

Vicksburg Chemical Corporation (VCC) is located less than a mile south of Interstate 20 bordering the City of Vicksburg, Mississippi. To the north and west of the site is light residential properties. To the East of the site is light industrial properties including the Vicksburg water treatment facility and an asphalt mixing and gravel drying operation. To the South of the site is light residential to rural properties.

## **2.3 SITE DESCRIPTION**

VCC is located off Highway 61 on Rifle Range Road. The facility is comprised of a North Plant and a South Plant and occupies approximately 640 acres. Currently, the only active areas of the plant include the nitric acid and potassium nitrate plants. All other portion of the plant are no longer in operation. Resources such as a potable water supply, electricity, and telephone service are available at the plant office located at the facility entrance on Rifle Range Road. Chemical on-site relative to the aforementioned active plants include anhydrous ammonia, nitric acid, potassium chloride, chlorine, and occasional nitrogen tetroxide, and nitrogen dioxide. Chemical on-site related to past production activities include atrazine, dinoseb, methyl parathion, monosodium methane arsenate (MSMA), and toxaphene. Other chemicals that have been detected on-site include carbon tetrachloride, chloroform, 1,1-dichloroethylene, ethylbenzene, methylene chloride, toluene, and xylene.

The work sites concerning this plan are associated with the South and North Plants (Figure 1) and include several Solid Waste Management Units (SWMUs) and Other Areas of Concern (OACs).

## **2.4 SITE HISTORY**

In the past, VCC produced various types of pesticides and herbicides such as dinoseb, toxaphene, atrazine, and monosodium methane arsenate. All of these chemicals have been detected in the soil and water by VCC and the state of Mississippi. Concentrations range from less than extractable products on hazardous wastes to an average of about 5 part per million (ppm). Chlorinated solvents have been detected in

sludge sediments in the ppm range for carbon tetrachloride, methylene chloride, chloroform, and 1,1-dichloroethylene. The source of the chlorinated solvents is unknown as well as the source of xylene toluene, and ethylbenzene, which have been detected in the range of 2-15 ppm.

**PURPOSE AND SCOPE OF PROPOSED WORK**

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WCC will perform work as required in a Consent Decree effective April 17, 1992. This Consent Decree requires Interim Measures activities, a Groundwater Assessment Program, and a RCRA Facility Investigation be conducted at the facility. These three workplans require geophysical borings, monitor well sampling and installation, subsurface soil sampling, and surface soil sampling. Some construction in conjunction with sump closure may be included in the Interim Measures activities.

The following hazards have been identified and will be protected against:

- Heat stress.
- Biological hazardous.
- Physical hazards.
- Skin contact with organic contaminants.

#### **4.1 BIOLOGICAL HAZARDS**

If clearing has not been conducted or if biological hazards develop during work activities, practical guidelines for prevention of exposure to pests should be implemented.

#### **4.2 HEAT STRESS HAZARDS**

If heat stress becomes a concern, the heat stress casualty prevention plan, presented in Appendix A shall be implemented.

#### **4.3 PHYSICAL HAZARDS**

Personnel should be cognizant of the fact that when protective equipment such as respirators, gloves, and protective clothing are worn, visibility and manual dexterity are impaired. In addition, personnel should be alert to physical hazards such as slipping/tripping/falling potentially associated with dismantled process equipment and piping remnants/ladders/stairways in various stages of disrepair, and uneven ground surface due to foundation fragments distributed throughout the site. Drilling personnel should abide by standard safety guidelines applicable to drilling operation presented in Appendix B.

#### 4.4 CHEMICAL HAZARDS

Due to past production activities at the facility, pesticides, herbicides, chlorinated solvents, and volatile organic solvents have been detected on-site during site characterization efforts conducted by VCC and the state of Mississippi. The constituents detected included dinoseb, toxaphene, atrazine, carbon tetrachloride, methylene chloride, chloroform, 1,1-dichloroethylene, xylene, toluene, and ethylbenzene at concentration report in the parts per million range. Of the constituents detected on-site, carbon tetrachloride, methylene chloride, and chloroform are classified by OSHA and/or ACGIH as known or suspected human carcinogens.

The constituents detected on-site are present in low concentrations. However, exposure to these chemicals may potentially occur through inhalation, ingestion, and/or direct contact. Chemical exposure via multiple exposure pathways is cumulative, therefore it is important to recognize potential exposure situations and to take precautions to minimize exposure to chemical hazards by all routes.

The following potential exposure routes and associated health hazards have been identified:

Inhalation: Chemical hazards associated with inhalation exposures may include irritation of the mucous membranes and respiratory tract or with more severe exposures, may include systemic effects. Table 1 presents recommended exposure limits for potential airborne constituents.

Ingestion. Ingestion of chemical will be controlled on-site by prohibiting eating, smoking, or drinking in the Exclusion Zone and by requiring all field personnel to conduct decontamination procedures prior to leaving the Exclusion Zone.

Direct Contact: Skin and eye contact with chemical hazards may potentially result in irritation, rashes, or burns. If a person should exhibit symptoms of eye or skin irritation, he/she should report to the SSO for immediate medical attention.

Potential hazards may be minimized by utilizing appropriate personal equipment designed to protect the body against contact with known or anticipated chemical hazards. Personal protective equipment is classified by the EPA by the level of protection afforded and is divided into four categories designated as Level A, B, C, and D with Level A providing the most extensive level of protection.

The levels of protection required for the field activities specified by the work scope are presented in Section 5.1

Chemical information sheets for each constituent known to be present at the site are presented in Appendix C. These sheets provide important information concerning physical/chemical properties, chemical/reactive hazards, exposure potentials, health hazards and symptoms of exposures, and appropriate treatment following exposure.

**Table 1**  
**Exposure Limits for Potential Airborne Contaminants**

| Constituent            | ACGIH TWA             | OSHA PEL-TWA          | STEL                | IDLH                  |
|------------------------|-----------------------|-----------------------|---------------------|-----------------------|
| +Toxaphene             | 0.5 mg/m <sup>3</sup> | 0.5 mg/m <sup>3</sup> | 1 mg/m <sup>3</sup> | 200 mg/m <sup>3</sup> |
| Atrazine               | 5 mg/m <sup>3</sup>   | 5 mg/m <sup>3</sup>   | --                  | --                    |
| + Carbon Tetrachloride | 5 ppm                 | 2 ppm                 | --                  | Ca                    |
| Methylene Chloride     | 50 ppm                | 500 ppm               | --                  | Ca                    |
| Chloroform             | 10 ppm                | 2 ppm                 | --                  | Ca                    |
| Xylene                 | 100 ppm               | 100 ppm               | 150 ppm             | 1000 ppm              |
| Toluene                | 100 ppm               | 100 ppm               | 150 ppm             | 2000 ppm              |
| Ethylbenzene           | 100 ppm               | 100 ppm               | 125 ppm             | 2000 ppm              |
| Lime Kiln Dust         | 10 mg/m <sup>3</sup>  | 10 mg/m <sup>3</sup>  | --                  | --                    |
| Ammonia                | 25 ppm                | 50 ppm                | 35 ppm              | 500 ppm               |

- + Potential Skin Irritant
- Ca Potential Human Carcinogen (Cancer Causing);
- No IDLH level established.

**GENERAL HEALTH AND SAFETY REQUIREMENTS**

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**5.1 PERSONAL PROTECTIVE EQUIPMENT**

Personal protective equipment (PPE) required to prevent contact with known or anticipated chemical hazards has been divided into four categories by the USEPA, Levels A, B, C and D, according to the degree of protection afforded. The following personnel protective equipment will be provided to personnel involved in site characterization work at the site.

**Mobilization - Level D Protection**

- Boots, steel toe and shank
- Hard hat
- safety glasses with side shields

**Modified Level D Protection**

- Coveralls, chemical resistant; tyvek (polycoated tyvek if splash hazard exists)
- Gloves (outer), chemical resistant, Polyvinyl Alcohol (PVAL)
- Gloves (inner), chemical-resistant, latex
- Boots, chemical-resistant (or bootie covers), steel toe and shank
- Safety glasses with side shields
- Hard hat (with faceshield if splash hazard exists)

**Modified Level C Protection**

- To include Modified Level D; PPE mentioned above
- Full-face air purifying respirators with organic vapor/pesticide/HEPA combination filter cartridges.

Tyvek coveralls will be discarded after each use or when they become worn or punctured. Suit materials are resistant to all known or anticipated chemicals at the site. If the disposable protective suits appear to be deteriorating under chemical action, the Site Safety Officer should be notified.

In addition to the personal protective equipment listed above, general safety equipment available for use will include a first aid kit, portable eye wash and fire extinguisher.

## **5.2 WORK ZONES**

During activities conducted in Modified Level D PPE, management of this project shall be conducted in such a manner which will restrict access to the job site by unauthorized personnel. If Level D action levels established in Table 2 are exceeded resulting in an upgrade to Level C PPE, work zones as described in the following paragraphs shall be implemented.

To minimize the movement of contaminants from the site to uncontaminated areas, three work zones will be set up during activities conducted under Level C PPE. The three work zones will include the following:

- Zone 1: Exclusion Zone
- Zone 2: Contamination Reduction Zone
- Zone 3: Support Zone

The exclusion zone is the zone where contamination does or could occur. Observations by the site safety officer will determine the extent of the zones. All persons entering this zone must wear at a minimum the level of protection set forth in Section 5.1 (Level C PPE).

Between the exclusion zone and support zone is the personnel contamination reduction zone (CRZ) which provides a transition zone between the contaminated and clean areas of the site. This zone will be located directly outside of the exclusion zone and will be defined as 10-foot zone directly outside the exclusion zone.

The support zone will be an uncontaminated area from which operations will be directed. It is essential that contamination from the site be kept out of this area. Included in this area will be a storage area for decontaminated clothing, additional personal protective equipment, etc.

One additional work zone will be set up for decontaminating equipment.

### 5.3 DECONTAMINATION PROCEDURES

VCC will have a minimum of one personnel decontamination station, strategically located or in the contamination reduction zone (CRZ) if applicable. The decontamination station will have at least the following items:

- An adequate-sized plastic sheet for flooring
- Boot wash equipment
  - Water/alconox solution container
  - Rinse water container
  - Long-handled plastic brush
- Waste container (disposable PPE, tape, etc.)
- Hand wash equipment
  - Water/alconox solution container
  - Rinse water container
  - Paper towels

#### 5.3.1 Equipment Decontamination

Decontamination of sample collection equipment will be accomplished by the following procedure:

- Washing in a detergent solution (Alconox)
- Triple rinsing with clean deionized water
- Rinsing with methanol
- Triple rinsing with clean deionized water

Decontamination of equipment shall be conducted in Modified Level D PPE as listed in Section 5.1. While utilizing methanol for decontaminating equipment, personnel shall position themselves upwind of decontamination operations to minimize inhalation exposures to methanol vapors. If this is not feasible, respiratory protection as listed under level C PPE in Section 5.1 shall be worn during methanol use.

### **5.3.2 Personnel Decontamination**

Decontamination of personnel will be performed at a designated location at the perimeter of the work area. Decontamination will consist primarily of soap and water washings and water rinse of exterior protective gear to remove contaminants, followed by doffing of the gear.

Coveralls should be removed by turning the clothing inside out. A general sequence of doffing procedures is outlined below. The extent of washing required, or modifications to the sequence, may be specified as appropriate.

Personnel will be decontaminated by the following procedure:

- Wash and rinse outer protective coverall
- Wash work gloves and boots
- Remove outer protective clothing
- Rinse respirator if worn
- Wash hands and face

Contaminated disposable PPE and all decontamination fluids shall be containerized on-site for subsequent disposal by the direction of VCC.

### **5.4 MEDICAL EXAMINATION**

Before commencing any of the field or laboratory activities defined in Section 3.0, all WCC personnel and all WCC subcontractors must take an annual WCC-approved medical examination as part of WCC's medical surveillance program.

## **5.5 SAFETY TRAINING DOCUMENTATION**

Prior to commencing any of the field activities defined in Section 3.0, all WCC personnel working on-site will supply certificate or equivalent, attesting to completing 40 hours of training as required by OSHA, in 29 CFR 1910.120, to the SSO. Site supervisors will be required to supply documentation indicating that an additional 8 hours of training has been completed. Escorted visitors may be allowed in a defined area without 40 hours training at the discretion of the WCC SSO and the WCC site coordinator.

Documentation concerning respirator fit testing, in accordance with OSHA, 29 CFR 1910.134 shall be required of any WCC employee wearing a respirator.

## **5.6 COMPLIANCE AGREEMENT**

The Project Manager and the Baton Rouge Health and Safety Officer shall hold meetings with all WCC field personnel before work commences. During the meeting, all personnel shall be provided with a copy of this safety plan; the plan shall be reviewed and discussed and questions answered. Signed Compliance Agreement Forms shall be collected by the Project Manager and filed by the Baton Rouge Health and Safety Officer. Individuals refusing to sign the form will not be allowed to work on the site.

## **5.7 PROJECT MANAGER NOTIFICATION**

All field personnel must inform the Project Manager or his designated representative before entering the site. The "buddy system" will be employed during all project work. This means that at least two members of the field crew must be on-site whenever work is performed. Personnel must be in visual contact with each other or carry two-way radios at all times.

## **5.8 PROJECT SAFETY LOG**

A project safety log will be used to record the names, entry and exit dates and times of all WCC and subcontractor personnel and of project site visitors; accidents, injuries, and illnesses; incidence of safety infractions by field personnel; air quality and personal exposure monitoring data; and other information related to safety matters. All accidents, illnesses or other incidence shall be reported immediately to the WCC Project Manager, and the WCC Baton Rouge Health and Safety Officer and subsequently documented for filing on the HS-502 Incident Report Form.

**5.9 PROHIBITIONS**

- Smoking, eating, drinking, chewing gum or tobacco, storing food or food containers shall not be permitted on the work site. Good personal hygiene should be practiced by field personnel to avoid ingestion of contaminants or spread of contaminated materials.
- Ignition of flammable liquids within, on, or through improvised heating devices or space heaters.
- Approach or entry into areas or spaces where toxic or explosive concentrations of gases or dust may exist without proper equipment available to enable safety entry.
- Conduct of on-site operations without off-site back up personnel.

**5.10 SITE SAFETY MEETINGS**

During all site characterization activities, daily safety meetings will be held by the site safety officer to review and plan the specific health and safety aspects of scheduled work for that day.

**LABORATORY CONSIDERATIONS**

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The laboratory director must be informed of any contaminant level in the samples that would require special handling procedures to prevent risk to the health and safety of laboratory personnel.

**PERSONAL PROTECTIVE EQUIPMENT**

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This section outlines the general usage guidelines for personal protective equipment.

**7.1 HEAD PROTECTION**

Hard hats must be worn by all personnel working on-site.

**7.2 EYE PROTECTION**

Safety glasses with side shields or goggles must be worn by all personnel performing activities where potential for eye or face exposure exists due to splash, dust, or vapor, etc. An eyewash station will be set up by the site safety officer prior to commencing field activities and should be placed so that it could be used quickly in an emergency.

**7.3 SKIN PROTECTION**

Due to the potential for skin absorption and carcinogenic properties chemical resistant gloves and coveralls shall be worn by all personnel during subsurface and sample handling activities. These will be disposed of in a designated sealable drum after each use of when they become worn or punctured.

**7.4 FOOTWEAR**

Chemical-resistant boots with steel toes and shanks will be worn by field personnel engaged in the field activities at the site. Chemical-resistant booties can be substituted for chemical resistant boots, although work boots to be covered must always maintain steel toes and shanks.

## **7.5 RESPIRATORY PROTECTION**

For respiratory protection against possible volatile organics, full-face air purifying respirators (APR) will be required if Level D air monitoring action levels are exceeded. Specific cartridges to be utilized with the APRs will be combination organic vapor/ammonia filter cartridges. All personnel must be properly fit-tested for the specific brand and size respirator to be used. Documentation of fit testing is to be provided to WCC SSO prior to commencement of work. A respirator which has not been successfully fit-tested cannot be used by an individual on the project. To ensure a proper fit, no facial hair will be allowed that will interfere with mask operation. The site safety officer will determine if facial hair represents such an interference. Air purifying respirators will only be used if the following conditions are met:

- The oxygen content of the air is greater than 19.5 percent.
- Concentration of air contaminants are known and monitored.
- The contaminants of concern all have good warning properties (i.e., odor threshold below PEL value).
- The protection factor is adequate and PELs are not exceeded.
- If concentrations of air contaminants exceed IDLH value, personnel must immediately evacuate.
- Cartridges are changed daily or whenever breakthrough occurs, whichever occurs first.
- Each person has been fit-tested for the specific brand and size of respirator used.
- The respirator is MSHA- and/or NIOSH-approved.

**AIR QUALITY MONITORING**

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The primary goal of on-site air quality monitoring will be compliance with the specified contaminant action levels. The secondary goal will be documentation of personal exposures as required by OSHA 1920.120.

**8.1 AIR QUALITY SURVEY**

During modified Level D field activities at the site, an air quality survey will be performed utilizing an HNu-photoionization detector (PID) equipped with an 11.7 ev probe, or equivalent instrument to characterize volatile organics and ammonia concentrations on-site. Standard operating procedures for this instrument are attached as Appendix E. During Level C field activities, additional sampling utilizing colorimetric tubes specific for detecting chloroform, methylene chloride, and carbon tetrachloride will be used along with the HNu for total organic vapors. At least two sampling events utilizing each of these tubes will be conducted in the breathing zone of personnel closest to the subsurface activities at the site. Table 2 lists air monitoring action levels for Level D and C work.

**TABLE 2**  
**AIR MONITORING ACTION LEVELS FOR LEVEL C AND D WORK**

| Contaminant      | Instrument*       | Reading    | Action Taken   |
|------------------|-------------------|------------|--|
| Volatile Organic | HNu or equivalent | <5 ppm     | Continued Work in Modified D Level   |
|                  |                   | 5 - 25 ppm | Upgrade to Level C and Expand Work Zones; Commence additional colorimetric tube sampling |
|                  |                   | >25 ppm    | Evacuate Area  |

\* Sustained reading above background (for 15 minutes continuous) which shall not be exceeded within worker breathing zones or exclusion zones.

**EMERGENCIES/ACCIDENTS**

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A site map and direction to Vicksburg Hospital are included in Figure 1. Illnesses, injuries, and accidents occurring on-site must be attended to immediately in the following manner:

- Remove the injured or exposed person(s) from immediate danger.
- Render FIRST AID if necessary. Decontaminate affected personnel, if necessary.
- Call ambulance for transport to local. This procedure should be followed even if there is no apparent serious injury. Emergency numbers are listed on the following section.
- Evacuate other personnel on-site to a safe place until the engineer (assisted by the Site Safety Officer) determines that it is safe for work to resume.
- Report the accident to the Health and Safety Officer immediately.
- Develop procedures, in accordance with the Health and Safety Officer, Site Safety Officer, and Project Manager to prevent a recurrence.

*In the event that an emergency site evacuation should be necessary for any reason, the Site Safety Officer will render an alarm using a horn and all personnel shall leave the site. The assembly point will be designated in the filed. Personnel will not return to the site until an all-clear has been received from the Site Safety Officer*

9.1 EMERGENCY NUMBERS

For any on-site Emergency dial 911.

| <u>Emergency Service</u>       | <u>Telephone</u> |
|--------------------------------|------------------|
| Fire Department                | 636-1121         |
| Ambulance                      | 911              |
| Sheriff                        | 636-1761         |
| Vicksburg Police Department    | 636-2511         |
| National Response Center (NRC) | 1-800-424-8802   |
| Poison Control Center          | 1-800-535-0525   |
| Vicksburg Medical Center       | 636-2611         |
| Mercy Regional Medical Center  | 631-2250         |

**PERSONNEL ASSIGNMENTS**

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WCC personnel and subcontractors authorized to work on this project and enter the site are:

|  |                              |
|--|------------------------------|
| Project Manager:                       | Richard D. Karkkainen        |
| Baton Rouge Health and Safety Officer: | Charles Self                 |
| Site Safety Officer:                   | Yong Goh                     |
| Field Personnel:                       | Mike Olson                   |
| Subcontractor:                         | Soil Testing Engineers, Inc. |

**10.1 PROJECT SAFETY PERSONNEL**

Personnel responsible for implementing this Safety Plan are the Project Manager and Site Safety Officer. Their specific responsibilities and authorities for all accountable WCC personnel are listed in this plan as well as Table 2-1 of the WCC Health and Safety manual dated November 1990.

**SAFETY PLAN COMPLIANCE AGREEMENT**

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I, \_\_\_\_\_ (print name), have received a copy of the Safety Plan for the Interim Measures, Groundwater Assessment, and RFI Field Investigation Workplans for VCC, Vicksburg, Mississippi (WCC Project No. 90B451C). I have read the plan, understand it, and agree to comply with all of its provisions. I understand that I could be prohibited from working on the project for violating any of the safety requirements specified in the plan.

Signed:

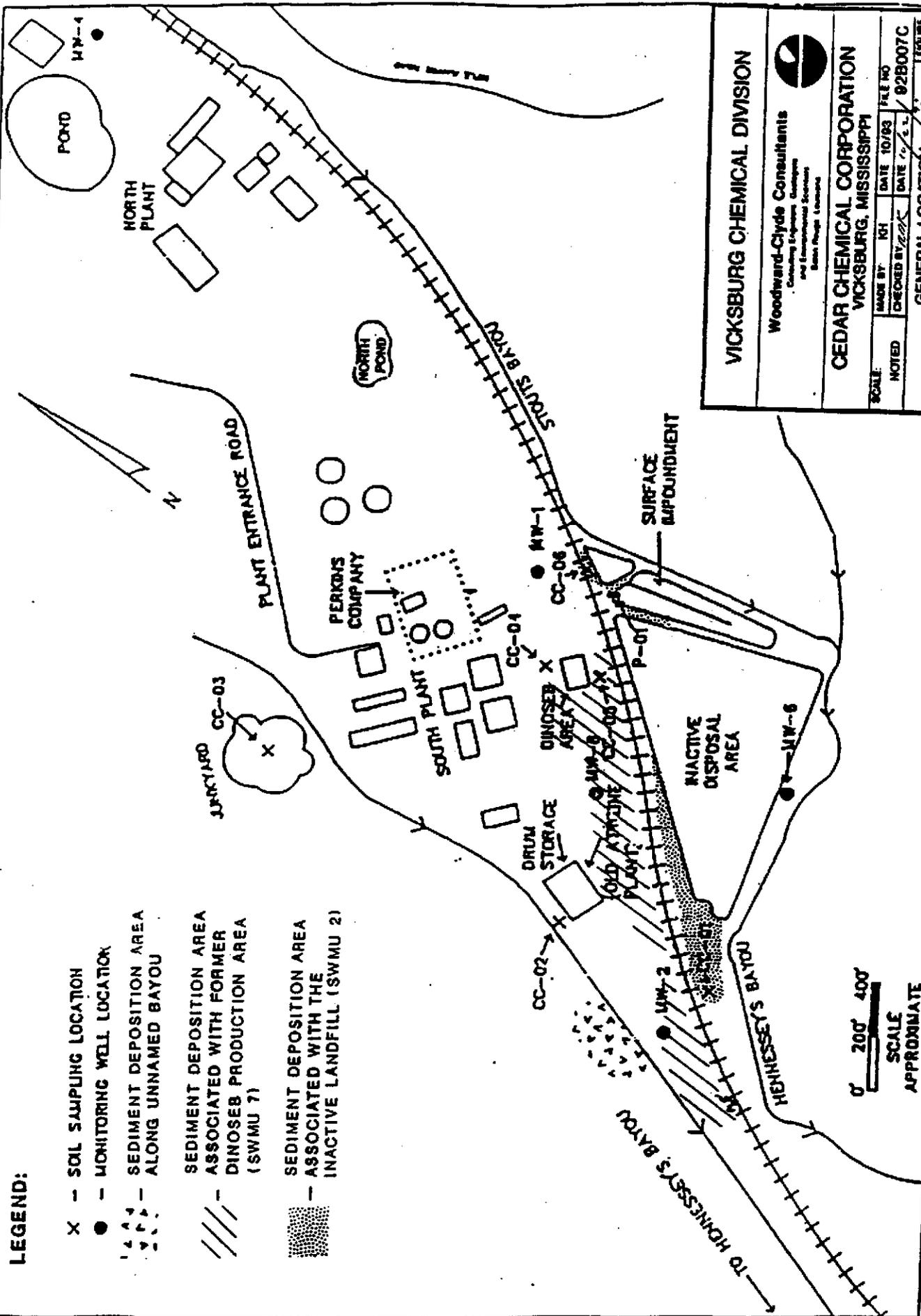
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Firm: \_\_\_\_\_

**LEGEND:**

- X -- SOIL SAMPLING LOCATION
- -- MONITORING WELL LOCATION
- ▴ ▾ -- SEDIMENT DEPOSITION AREA ASSOCIATED WITH UNNAMED BAYOU
- ▨ -- SEDIMENT DEPOSITION AREA ASSOCIATED WITH FORMER DINOSEB PRODUCTION AREA (SWMU 7)
- ▩ -- SEDIMENT DEPOSITION AREA ASSOCIATED WITH THE INACTIVE LANDFILL (SWMU 2)



**VICKSBURG CHEMICAL DIVISION**

Woodward-Clyde Consultants  
 Consulting Engineers, Geologists  
 and Environmental Scientists  
 Baton Rouge, Louisiana

**CEDAR CHEMICAL CORPORATION**  
 VICKSBURG, MISSISSIPPI

|                    |                 |             |          |
|--------------------|-----------------|-------------|----------|
| SCALE:             | MADE BY: KH     | DATE: 10/93 | FILE NO: |
| NOTED:             | CHECKED BY: JAC | DATE: 11/93 | 92B007C  |
| GENERAL LOCATION   |                 |             | FIGURE   |
| PLAN OF NORTH POND |                 |             | 1        |

0' 200' 400'  
 SCALE  
 APPROXIMATE

**APPENDIX A**  
**HEAT STRESS CASUALTY PREVENTION PLAN**

**APPENDIX A**

**HEAT STRESS CASUALTY PREVENTION PLAN**

Due to the increase in ambient air temperatures and the affects of protective outer wear decreasing body ventilation, there exists an increase in the potential for injury, specifically, heat casualties. Site personnel will be instructed in identification of a heat stress victim, the first-aid treatment procedures for the victim and the preventing of heat stress casualties.

**A. IDENTIFICATION AND TREATMENT**

1) Heat Exhaustion

- a) Symptoms: Usually begins with muscular weakness, dizziness, nausea, and staggering gait. Vomiting is frequent. The bowels may move involuntarily. The victim is very pale, his skin is clammy skin, and he may perspire profusely. The pulse is weak and fast, his breathing is shallow. He may faint unless he lies down. This may pass, but sometimes it remains and death could occur.
  
- b) First Aid: Immediately remove the victim to the Personnel Decontamination Reduction Zone in a shady or cool area with good air circulation. Remove all protective outer wear. Call a physician. Treat the victim for shock. (Make him lie down, raise his feet 6 to 12 inches and loosen all clothing.) Transport victim to a medical facility as soon as possible.

2) Heat Stroke

- a) Symptoms: This is the most serious of heat casualties due to the fact that the body excessively overheats. Body temperatures often are between 107 degrees to 110 degrees Fahrenheit. First there is often pain in the head, dizziness, nausea, oppression, and the skin is dry, red and hot. Unconsciousness follows quickly and death is imminent if exposure continues. The attack will usually occur suddenly.
- b) First Aid: Immediately evacuate the victim to a cool and shady area in the Personnel Decontamination Reduction Zone. Remove all protective outer wear and all personal clothing. Lay him on his back with his head and shoulders slightly elevated. It is imperative that the body temperature be lowered immediately. This can be accomplished by applying cold wet towels, ice bags, etc., to the head. Sponge off bare skin with cool water or place him in a tub of cool water. The main objective is to cool him without chilling him. Give no stimulants. Transport the victim to a medical facility as soon as possible.

B. PREVENTION OF HEAT STRESS

- 1) One of the major causes of heat casualties is the depletion of body fluids. On the site there will plenty of fluids available. Personnel should replace water and salts loss from sweating. Salts can be replaced by either 0.1 percent solution, more heavily salted foods, or commercial mixes such as Gatorade. The commercial mixes are advised for personnel on low sodium diets.
- 2) A work schedule should be established so that the majority of the work day will be during the morning hours of the day before ambient air temperature levels reach their highs.

- 3) A work/rest guideline will be implemented for personnel required to wear Level B or Level C protection. This guideline is as follows:

| <u>Ambient Temperatures</u> | <u>Maximum Working Time</u> |
|-----------------------------|-----------------------------|
| Above 90°F                  | 1/2 hour                    |
| 80°-90°F                    | 1 hour                      |
| 70°-80°F                    | 2 hours                     |
| 60°-70°F                    | 3 hours                     |
| 50°-60°F                    | 4 hours                     |
| 40°-50°F                    | 5 hours                     |
| 30°-40°F                    | 6 hours                     |
| Below 30°F                  | 8 hours                     |

A sufficient period will be allowed for personnel to "cool down". This may require shifts of workers during operations.

### C. HEAT STRESS MONITORING

For monitoring the body's recuperative ability to excess heat, one or more of the following techniques should be used as a screening mechanism. Monitoring of personnel wearing protective clothing should commence when the ambient temperature is 70 degrees Fahrenheit or above. Frequency of monitoring should increase as the ambient temperature increases or if slow recovery rates are indicated. When temperatures exceed 80 degrees Fahrenheit, workers must be monitored for heat stress after every work period.

Heart rate should be measured at the radial pulse for 30 seconds as early as possible in the resting period. The heart rate at the beginning of the rest period should not exceed 110 beats per minute. If the heart rate is higher, the next work period should be shortened by 10 minutes (or 33 percent), while the length of the rest period stays the same. If the pulse rate is 100 beats per minute at the beginning of the next rest period, the following work cycle should be shortened by 33 percent.

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Body temperature should be measured orally with a clinical thermometer as early as possible in the resting period. Oral temperature at the beginning of the rest period should not exceed 99 degrees Fahrenheit. If it does, the next work period should be shortened by 10 minutes (or 33 percent), while the length of the rest period stays the same. However, if the oral temperature exceeds 99.7 degrees Fahrenheit at the beginning of the next period, the following work cycle should be further shortened by 33 percent. Oral temperature should be measured again at the end of the rest period to make sure that it has dropped below 99 degrees Fahrenheit.

Body water loss due to sweating should be measured by weighing the worker in the morning and in the evening. The clothing worn should be similar at both weighings; preferably, the worker should be weighed nude. The scale should be accurate to plus or minus one-quarter pound. Body water loss should not exceed 1.5 percent of the total body weight. If it does, workers should be instructed to increase their daily intake of fluids by the weight lost.

Ideally, body fluids should be maintained at a constant level during the work day. This requires replacement of salt lost in sweat as well.

Good hygiene standards must be maintained by frequent changes of clothing and daily showering. Clothing should be permitted to dry during rest periods. Persons who notice skin problems should immediately consult medical personnel.

**APPENDIX B**  
**SAFETY GUIDELINES FOR DRILLING**

**APPENDIX B**

**SAFETY GUIDELINES FOR DRILLING**

Drill rig maintenance and safety is the responsibility of the drill rig operator. However, safety requires the attention and cooperation of every worker and visitor to the job. The following is provided as a general guideline for safe drilling practices onsite.

**OFF-ROAD MOVEMENT OF DRILL RIGS**

The following safety guidelines relate to off-road movement:

- o Before moving a drill rig, first walk the route of travel, inspecting for depressions, slumps, gullies, ruts and similar obstacles.
- o Always check the brakes of a drill rig carrier before traveling, particularly on rough, uneven or hilly ground.
- o Discharge all passengers before moving a drill rig on rough or hilly terrain.
- o Engage the front axle (for 4x4, 6x6, etc., vehicles or carriers) when traveling off-highway on hilly terrain.
- o Use caution when traveling side-hill. Conservatively evaluate side-hill capability of drill rigs because the arbitrary addition of drilling tools may raise the center of mass. When possible, travel directly uphill or downhill.
- o Attempt to cross obstacles such as small logs and small erosion channels or ditches squarely, not at an angle.
- o Use the assistance of someone on the ground as a guide when lateral or overhead clearance is narrow.

- o After the drill rig has been moved to a new drilling site, set all brakes and/or locks. When grades are steep, block the wheels.
- o Never travel off-road with the mast (derrick) of the drill rig in the raised or partially raised position.
- o Tie-down loads on the drill rig and support trucks during transport.

### **OVERHEAD AND BURIED UTILITIES**

The use of a drill rig near electrical power lines and other utilities requires that special precautions be taken by both supervisors and members of the exploration crew. Electricity can shock, it can burn and it can cause death.

Overhead and buried utilities should be located, noted and emphasized on all boring location plans and boring assignment sheets.

Before raising the drill rig mast (derrick) on a site in the vicinity of power lines, walk completely around the drill rig. Determine what the minimum distance from any point on the drill rig to the nearest power line will be when the mast is raised and/or being raised. Do not raise the mast or operate the drill rig if this distance is less than 20 feet.

Keep in mind that both hoist lines and overhead power lines can be moved toward each other by the wind.

### **CLEARING THE WORK AREA**

Prior to drilling, adequate site cleaning and leveling should be performed to accommodate the drill rig and supplies and provide a safe working area. Drilling should not be commenced when tree limbs, unstable ground or site obstructions cause unsafe tool handling conditions.

**NOTE:** In coordination with the Drilling Crew, the Site Health and Safety Manager will review the precautions taken to insure that the drill rig is leveled and stabilized.

### **HOUSEKEEPING ON AND AROUND THE DRILL RIG**

The first requirement for safe field operations is that the drilling crew safety supervisor understands and fulfills the responsibility for maintenance and "housekeeping" on and around the drill rig.

Suitable storage locations should be provided for all tools, materials and supplies so that they can be conveniently and safely handled without hitting or falling on a member of the drill crew or a visitor.

Avoid storing or transporting tools, materials or supplies within or on the mast (derrick) of the drill rig.

Pipe, drill rods, bits casing, augers and similar drilling tools should be orderly stacked on racks or sills to prevent spreading, rolling or sliding.

Penetration or other driving hammers should be placed at a safe location on the ground or be secured to prevent movement when not in use.

Work areas, platforms, walkways, scaffolding and other accessways should be kept free of materials, obstructions and substances such as ice, excess grease or oil that could cause a surface to become slick or otherwise hazardous.

Keep all controls, control linkages, warning and operation lights and lenses free of oil, grease and/or ice.

Do not store gasoline in any portable container other than a non-sparking, red container with a flame arrester in the fill spout and having the word "gasoline" easily visible.

## **SAFE USE OF HAND TOOLS**

There are almost an infinite number of hand tools that can be used on or around a drill rig. "Use the tool for its intended purpose" is the most important rule. The following are a few specific and some general suggestions which apply to safe use of several hand tools that are often used on and around drill rigs.

- o When a tool becomes damaged, either repair it before using it again or get rid of it.
- o When using a hammer, any kind of hammer for any purpose, wear safety glasses and require all others near you to wear safety glasses.
- o When using a chisel, any kind of chisel, for any purpose, wear safety glasses and require all others around you to wear safety glasses.
- o Keep all tools cleaned and orderly stored when not in use.
- o Replace hook and heel jaws when they become visibly worn.
- o When breaking tool joints on the ground or on a drilling platform, position your hands so that your fingers will not be smashed between the wrench handle and the ground or the platform, should the wrench slip or the joint suddenly let go.

## **SAFE USE OF WIRE LINE HOISTS, WIRE ROPE AND HOISTING HARDWARE**

The use of wire line hoists, wire rope, and hoisting hardware should be as stipulated by the American Iron and Steel Institute's Wire Rope Users Manual.

All wire ropes and fittings should be visually inspected during use and thoroughly inspected at least once a week for abrasion, broken wires, wear, reduction in rope diameter, reduction in wire diameter, fatigue, corrosion, damage from heat, improper weaving, jamming, crushing, bird caging, kinking, core protrusion, and damage to lifting

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hardware and any other feature that would lead to failure. Wire ropes should be replaced when inspection indicates excessive damage according to the wire rope users manual.

If a ball-bearing-type hoisting swivel is used to hoist drill rods, swivel bearings should be inspected and lubricated daily to assure that the swivel freely rotates under load.

If a rod slipping device is used to hoist drill rods, do not drill through or rotate drill rods through the slipping device, do not hoist more than 1 foot (0.3m) of the drill rod column above the top of the mast (derrick), do not hoist a rod column with loose tool joints and do not make up, tighten or loosen tool joints while the rod column is being supported by a slipping device. If drill rods should slip back into the borehole, do not attempt to break the fall of the rods with your hands.

Most sheaves on drill rigs are stationary with a single-part line. The number of parts of line should never be increased without first consulting with the manufacturer of the drill rig. Wire ropes must be properly matched with each sheave.

The following procedures and precautions must be understood and implemented for safe use of wire ropes and rigging hardware.

Use tool-handling hoists only for vertical lifting of tools (except when angle-hole drilling). Do not use tool-handling hoists to pull on objects away from the drill rig; however, drills may be moved using the main hoist as the wire rope is spooled through proper sheaves according to the manufacturer's recommendations.

When stuck tools or similar loads cannot be raised with a hoist, disconnect the hoist line and connect the stuck tools directly to the feed mechanism of the drill. Do not use hydraulic leveling jacks for added pull to the hoist line or the feed mechanism of the drill.

When attempting to free a mired vehicle or drill rig carrier, only use a winch on the front or rear of the vehicle or drill rig carrier and stay as far away as possible from the wire rope. Do not attempt to use tool hoists to free a mired vehicle or drill rig carrier.

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To minimize shock loading of a wire rope, always apply loads smoothly and steadily.

Some additional safety guidelines that should be followed are:

- o Protect wire rope from sharp corners or edges.
- o Replace faulty guides and rollers.
- o Replace worn sheaves or worn sheave bearings.
- o Replace damaged safety latches on safety hooks before use.
- o Know the safe working load of the equipment and tackle being used. Never exceed this limit.
- o Periodically inspect and test clutches and brakes of hoists.
- o Know and do not exceed the rated capacity of hooks, rings, links, swivels, shackles and other lifting aids.
- o Always wear gloves when handling wire ropes.
- o Do not guide wire ropes on hoist drums with your hands.
- o After installation of a new wire rope, lift a light load to allow the wire rope to adjust.
- o Never carry out any hoisting operations when the weather conditions are such that hazards to personnel, the public or property are created.
- o Never leave a load suspended when the hoist is unattended.

- o Keep your hands away from hoists, wire rope, hoisting hooks, sheaves and pinch points as slack is being taken up and when the load is being hoisted.
- o Never hoist a load over members of the crew.

**SAFE USE OF AUGERS**

The following general procedures should be used when advancing a boring with continuous-flight or hollow-stem augers:

- o Prepare to start an auger boring with the drill rig level, the clutch or hydraulic rotation control disengaged, the transmission in low gear and the engine running at low RPM.
- o The operator and tool handler should establish a system of responsibility for the various activities required for auger drilling, such as connecting and disconnecting auger sections and inserting and removing the auger fork. The operator must assure that the tool handler is well away from the auger column and that the auger fork is removed before starting rotation.
- o Use only the manufacturer's recommended method of securing the auger to the power coupling. Do not touch the coupling or the auger with your hands, a wrench or any other tools during rotation.
- o Whenever possible, use tool hoists to handle auger sections.
- o Never place hands or fingers under the bottom of an auger section when hoisting the auger over the top of the auger section in the ground or other hard surfaces such as the drill rig platform.

- o Never allow feet to get under the auger section that is being hoisted.
- o When rotating augers, stay clear of the rotating auger and other rotating components of the drill rig. Never reach behind or around a rotating auger for any reason whatever.
- o Never use your hands or feet to move cuttings away from the auger.
- o When cleaning augers, be sure the drill rig is in neutral and the augers are stopped from rotating.

### **SAFETY DURING ROTARY AND CORE DRILLING**

Rotary drilling tools should be safety-checked before use. In particular, check for the following:

- o See that water swivels and hoisting plugs are lubricated and checked for frozen bearings before use.
- o Check rod chuck jaws periodically and replace them when necessary.
- o Check the capacities of hoists and sheaves against the anticipated weight on the drill rod string plus other expected hoisting loads. Inspect all cables daily.

These other special precautions should be taken for safe rotary or core drilling:

- o Drill rods should not be braked during lowering into the hole with drill rod chuck jaws.
- o Drill rods should not be held or lowered into the hole with pipe wrenches.
- o If a string of drill rods are accidentally or inadvertently released into the hole, do not attempt to grab the falling rods with your hands or a wrench.

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- o In the event of a plugged bit or other circulation blockage, the high pressure in the piping and hose between the pump and the obstruction should be relieved or bled down before breaking the first tool joint.
- o When drill rods are hoisted from the hole, they should be cleaned for safe handling with a rubber or other suitable rod wiper. Do not use your hands to clean drilling fluids from drill rods.
- o If work must progress over a portable drilling fluid (mud) pit, do not attempt to stand on narrow sides or cross members. The mud pit should be equipped with a rough surface and fitted cover panels of adequate strength to hold drill rig personnel.
- o Drill rods should not be lifted and leaned unsecured against the mast. Either provide some method of securing the upper ends of the drill rod sections for safe vertical storage or lay the rods down.
- o Inspect all hydraulic lines periodically and replace as needed.

### **START-UP**

All drill rig personnel and visitors should be instructed to "stand-clear" of the drill rig immediately prior to and during starting of an engine.

Make sure all gear boxes are in neutral, all hoist levers are disengaged, all hydraulic levers are in the correct, non-actuating positions, and the cathead rope is not on the cathead before starting a drill rig engine.

### **SAFETY DURING DRILLING OPERATIONS**

Safety requires the attention and cooperation of every worker and site visitor.

Do not drive the drill rig from hole to hole with the mast (derrick) in the raised position.

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Before raising the mast (derrick) look up to check for overhead obstructions.

Before raising the mast (derrick), all drill rig personnel and visitors (with exception of the operator) should be cleared from the area immediately to the rear and the sides of the mast. All drill rig personnel and visitors should be informed that the mast is being raised prior to raising it.

Before the mast (derrick) of a drill rig is raised and drilling is commenced, the drill rig must be first leveled and stabilized with leveling jacks and/or solid cribbing. The drill rig should be relevelled if it settles after initial set up. Lower the mast (derrick) only when leveling jacks are down and do not raise the leveling jack pads until the mast (derrick) is lowered completely.

Before starting drilling operations, secure and/or lock the mast (derrick) if required according to the drill manufacturer's recommendations.

The operator of a drill rig should only operate a drill rig from the position of the controls. The operator should shut down the drill engine before leaving the vicinity of the drill.

Do not consume alcoholic beverages or other depressants or chemical stimulants prior to starting work on a drill rig or while on the job.

Watch for slippery ground when mounting/dismounting from the platform.

All unattended boreholes must be adequately covered or otherwise protected to prevent drill rig personnel, site visitors or animals from stepping or falling into the hole. All open boreholes should be covered, protected, or backfilled adequately and according to local or state regulations on completion of the drilling project.

"Horsing around" within the vicinity of the drill rig and tool and supply storage areas should never be allowed, even when the drill rig is shut down.

Be careful when lifting heavy objects.

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Before lifting a relatively heavy object, approach the object by bending at the knees, keeping your back vertical and unarched while obtaining a firm footing. Grasp the object firmly with both hands and stand slowly and squarely while keeping your back vertical and unarched. In other words, perform the lifting with the muscles in your legs, not with the muscles in your lower back.

Drilling operations should be terminated during an electrical storm.

**APPENDIX C**  
**CHEMICAL INFORMATION SHEETS**

## AMMONIA

### ● Hazardous substance (EPA)

**Description:**  $\text{NH}_3$ , ammonia is a colorless, strongly alkaline, and extremely soluble gas with a characteristic pungent odor.

**Code Numbers:** CAS 7664-41-7 RTECS B00875000 UN 1005

**DOT Designation:** Nonflammable gas.

**Synonyms:** Anhydrous ammonia.

**Potential Exposures:** Ammonia is used as a nitrogen source for many nitrogen-containing compounds. It is used in the production of ammonium sulfate and ammonium nitrate for fertilizers and in the manufacture of nitric acid, soda, synthetic urea, synthetic fibers, dyes, and plastics. It is also utilized as a refrigerant and in the petroleum refining and chemical industries. It is used in the production of many drugs (A-41) and pesticides (A-32).

Other sources of occupational exposure include the silvering of mirrors, glue-making, tanning of leather, and around nitriding furnaces. Ammonia is produced as a by-product in coal distillation and by the action of steam on calcium cyanamide, and from the decomposition of nitrogenous materials.

**Incompatibilities:** Strong oxidizers, calcium, hypochlorite bleaches, gold, mercury, silver, halogens.

**Permissible Exposure Limits in Air:** The Federal standard for ammonia is an 8-hour time-weighted average of 50 ppm ( $35 \text{ mg/m}^3$ ). NIOSH has recommended 50 ppm expressed as a ceiling and determined by a 5-minute sampling period. ACGIH as of 1983/84 has set TWA values of 25 ppm ( $18 \text{ mg/m}^3$ ). The tentative STEL value is 35 ppm ( $27 \text{ mg/m}^3$ ). The IDLH level is 500 ppm.

**Determination in Air:** Collection by midget impinger and colorimetric analysis using Nessler's reagent (A-10). Ammonia may also be determined using long-duration detector tubes (A-11).

**Permissible Concentration in Water:** EPA in 1976 (A-3) proposed a limit of  $0.02 \text{ mg/l}$  (as unionized ammonia) for the protection of freshwater aquatic life. As of 1980, EPA (2) first proposed adding ammonia to the list of priority toxic pollutants and developing criteria for it, but then withdrew the proposal. NAS/NRC proposed (A-2) a limit of  $0.5 \text{ mg/l}$  for drinking water.

**Routes of Entry:** Inhalation of gas, ingestion, skin and eye contact.

**Harmful Effects and Symptoms:** *Local* — Contact with anhydrous liquid ammonia or with aqueous solutions is intensely irritating to the mucous membranes, eyes, and skin. Eye symptoms range from lacrimation, blepharospasm, and palpebral edema to a rise of intraocular pressure, and other signs resembling acute-angle closure glaucoma, corneal ulceration, and blindness. There may be corrosive burns of skin or blister formation. Ammonia gas is also irritating to the eyes and to moist skin.

*Systemic* — Mild to moderate exposure to the gas can produce headache, salivation, burning of throat, anosmia, perspiration, nausea, vomiting, and sub-sternal pain. Irritation of ammonia gas in eyes and nose may be sufficiently intense to compel workers to leave the area. If escape is not possible, there may be severe irritation of the respiratory tract with the production of cough, glottal edema, bronchospasm, pulmonary edema, or respiratory arrest. Bronchitis or pneumonia may follow a severe exposure if patient survives. Urticaria is a rare allergic manifestation from inhalation of the gas.

**Points of Attack:** Lungs, respiratory system, eyes.

**Medical Surveillance:** Preemployment physical examinations for workers in ammonia exposure areas should be directed toward significant changes in the skin, eyes, and respiratory system. Persons with corneal disease, and glaucoma, or chronic respiratory diseases may suffer increased risk. Periodic examinations should include evaluation of skin, eyes, and respiratory system, and pulmonary function tests to compare with baselines established at preemployment examination.

**First Aid:** If this chemical gets into the eyes, irrigate immediately. If this chemical contacts the skin, flush with water immediately. If a person breathes in large amounts of this chemical, move the exposed person to fresh air at once and perform artificial respiration. When this chemical has been swallowed, get medical attention. Do not induce vomiting.

**Personal Protective Methods:** Where ammonia hazards exist in concentrations above the standard, respiratory, eye, and skin protection should be provided. Fullface gas masks with ammonia canister or supplied air respirators, both with full facepieces, afford good protection. In areas where exposure to liquid ammonia occurs, goggles or face shields, as well as protective clothing impervious to ammonia and including gloves, aprons, and boots should be required. Where ammonia gas or concentrated ammonia solution is splashed in eyes, immediate flooding of the eyes with large quantities of water for 15 minutes or longer is advised, followed at once by medical examination.

In heavy concentrations of ammonia gas, workers should be outfitted with complete self-contained protective suits impervious to ammonia, with supplied air source, and full headpiece and facepiece. Appropriate clothing should be worn to prevent any possible skin contact with liquids of >10% content or reasonable probability of contact with liquids of <10% content. Wear eye protection to prevent any possibility of eye contact with liquids of >10% NH<sub>3</sub> content. Employees should wash immediately when skin is wet or contaminated with liquids of >10% content. Remove nonimpervious clothing immediately if wet or contaminated with liquids containing >10% and promptly remove if liquid contains <10% NH<sub>3</sub>. Provide emergency showers and eyewash if liquids containing >10% NH<sub>3</sub> are involved.

**Respirator Selection:**

- 100 ppm: CCRS/SA/SCBA
- 300 ppm: CCRSF
- 500 ppm: GMS/SAF/SCBAF
- Escape: GMS/SCBA

**Disposal Method Suggested:** Dilute with water, neutralize with HCl and discharge to sewer (A-38). Recovery is an option to disposal which should be considered for paper manufacture, textile treating, fertilizer manufacture and chemical process wastes (A-57).

**References**

- (1) National Institute for Occupational Safety and Health, *Criteria for a Recommended Standard: Occupational Exposure to Ammonia*, NIOSH Doc. No. 74-136, Washington, DC (1974).
- (2) U.S. Environmental Protection Agency, "Toxic Pollutant List: Proposal to Add Ammonia," *Federal Register*, 45, No. 2, 803-806 (January 3, 1980) Rescinded by *Federal Register*, 45, No. 232, 79692-79693 (December 1, 1980).
- (3) National Research Council, Committee on Medical and Biologic Effects of Environmental Pollutants, *Ammonia*, Baltimore, MD, University Park Press (1979).
- (4) Sax, N.I., Ed., *Dangerous Properties of Industrial Materials Report*, 2, No. 1, 65-68, New York, Van Nostrand Reinhold Co. (1982).
- (5) See Reference (A-61).
- (6) Sax, N.I., Ed., *Dangerous Properties of Industrial Materials Report*, 3, No. 3, 49-53, New York, Van Nostrand Reinhold Co. (1983).
- (7) See Reference (A-60).
- (8) Parmeggiani, L., Ed., *Encyclopedia of Occupational Health & Safety*, Third Edition, Vol. 1, pp 148-150, Geneva, International Labour Office (1983).

# ATRAZINE

ATZ

|  |  |
|--|--|
| <p><b>Common Synonyms</b><br/>2-Chloro-4-(ethoxyphenyl)-6-(isopropylamino)-s-triazine<br/>Atrazine Herbicide</p> | <p><b>Solid crystals</b>    <b>White</b></p> |
| <p><b>Solub in water:</b></p>  |  |

**AVOID CONTACT WITH SOLID AND DUST  
PEOPLE AWAY**  
Wear goggles and well-ventilated breathing apparatus.  
See warning. Use extra care to "break down" dust  
layers and remove all residual material.  
Wash your hands and wash your clothing.

**Fire**

Not flammable  
**POISONOUS GASES MAY BE PRODUCED WHEN HEATED.**

**Exposure**

**CALL FOR MEDICAL AID**

**DUST  
POISONOUS IF INHALED.**  
Wash face, nose and throat.  
Wash throat by gargling.  
If in eyes, hold eyelids open and flush with plenty of water.  
If breathing is difficult, give oxygen.

**SOLID  
POISONOUS IF SWALLOWED**  
Wash mouth with water.  
Remove contaminated clothing and shoes.  
Flush stomach with plenty of water.  
If in EYES, hold eyelids open and flush with plenty of water.  
If SWALLOWED and victim is CONSCIOUS, have victim drink water  
or milk and have vomit induced immediately.  
If SWALLOWED and victim is UNCONSCIOUS OR HAVING CON-  
VULSIONS, do nothing except take victim to hospital.

**Water  
Pollution**

**HARMFUL TO AQUATIC LIFE IN VERY LOW CONCENTRATIONS.**  
May be dangerous if it enters water streams.  
Wash your hands and avoid contact.  
Wash containers of residue after use.

**6. FIRE HAZARDS**

6.1 Flash Point: Not determined  
6.2 Flammable Limits in Air: Not determined  
6.3 Fire Extinguishing Agents: Not determined  
6.4 Fire Extinguishing Agents that do not work: Not determined  
6.5 Special Hazards of Combustion: Products forming hydrogen chloride and low oxides of nitrogen may be formed.  
6.6 Behavior in Fire: Not determined  
6.7 Ignition Temperature: Not determined  
6.8 Self-Heating Hazard: Not determined  
6.9 Burning Rate: Not determined  
6.10 Autoxidation Potential: Not determined  
6.11 Stability/Reactivity in Fire: Not determined  
6.12 Flash Temperature: Not determined

**10. HAZARD ASSESSMENT CODE**  
(See Hazard Assessment Handbook)  
**H**

**11. HAZARD CLASSIFICATIONS**

11.1 Code of Federal Regulations: Not used  
11.2 GHS Hazard Rating for Bulk Water Transportation:  
Category      Rating  
Fire              0  
Explosive        0  
Vapor Haze      0  
Liquid or Solid Haze    2  
Poison            0  
Water Pollution      3  
Human Toxicity      3  
Aquatic Toxicity    3  
Acid/Alkali Effect    3  
Reactivity:  
Oxidizing          1  
Water               1  
Self-Reactive      0

11.3 NFPA Hazard Classification: Not used

**7. CHEMICAL REACTIVITY**

7.1 Reactivity with Water: Not determined  
7.2 Reactivity with Common Inorganic Acids: Not determined  
7.3 Stability during Transport: Stable  
7.4 Hazardous Agents for Air and Water: Not determined  
7.5 Polymerization: Not determined  
7.6 Initiator of Polymerization: Not determined  
7.7 Other Hazards: Not determined  
7.8 Reactivity Group: Not determined

**12. PHYSICAL AND CHEMICAL PROPERTIES**

12.1 Physical State at 20°C and 1 atm: Solid  
12.2 Molecular Weight: 215.7  
12.3 Boiling Point at 1 atm: 250°C  
12.4 Freezing Point: 34°F = 1°C = 278K  
12.5 Critical Temperature: Not determined  
12.6 Critical Pressure: Not determined  
12.7 Specific Gravity: (20/20) 1.2 at 20°C (68°F)  
12.8 Liquid Surface Tension: Not determined  
12.9 Liquid Viscosity: Not determined  
12.10 Vapor Phase Specific Gravity: Not determined  
12.11 Ratio of Specific Heats of Vapor Phase: Not determined  
12.12 Latent Heat of Vaporization: Not determined  
12.13 Heat of Combustion (solid): -9,500 Btu/lb = -4,300 kJ/kg = -500 Btu/lb  
12.14 Heat of Decomposition: Not determined  
12.15 Heat of Solvation: Not determined  
12.16 Heat of Polymerization: Not determined  
12.17 Heat of Fusion: Not determined  
12.18 Limiting Viscosity: Not determined  
12.19 Heat Vapor Pressure: Not determined

**8. WATER POLLUTION**

8.1 Aquatic Toxicity: 125 mg/l 48 hr (fish) (LC50)  
8.2 Water Solubility: >2000 mg/l (20°C)  
8.3 Biological Oxygen Demand (BOD): Not determined  
8.4 Food Chain Concentration Potential: None

**9. SHIPPING INFORMATION**

9.1 Grade or Purity: Various grades, 70-90%. Mixtures with certain dyes and sodium metasilicate  
9.2 Storage Temperature: Ambient  
9.3 Inert Atmosphere: No requirements  
9.4 Venting: Open

|  |   |
|--|---|
| <p><b>1. RESPONSE TO DISCHARGE</b><br/>(See Response Methods Handbook)<br/>Leak stopping-over containment should be initiated.<br/>Chemical and physical treatment.</p>  | <p><b>2. LABEL</b><br/>2.1 Category: None<br/>2.2 Hazard: Not determined</p>  |
| <p><b>3. CHEMICAL IDENTIFICATION</b><br/>3.1 CAS Registry No.: 1912-24-9<br/>3.2 Formula: C<sub>6</sub>H<sub>7</sub>N<sub>3</sub>O<br/>3.3 Molecular Weight: 215.1600<br/>3.4 DOT ID No.: 1400<br/>3.5 CAS Registry No.: 1912-24-9</p> | <p><b>4. OBSERVABLE CHARACTERISTICS</b><br/>4.1 Physical State (at shipping): Solid<br/>4.2 Color: White<br/>4.3 Odor: Data not available</p> |

**5. HEALTH HAZARDS**

5.1 Personal Protective Equipment: Dust mask, goggles, rubber gloves  
5.2 Symptoms Following Exposure: Irritates eyes and skin. If ingested, causes nausea and stomach pain.  
5.3 Treatment of Exposure: EYES: Flush with copious amounts of water for 15 min. SKIN: Wash with large amounts of water. INGESTION: No emetics induced. induce vomiting and give a saline laxative and supportive therapy.  
5.4 Threshold Limit Value: 5 mg/m<sup>3</sup>  
5.5 Short Term Exposure Limit: Data not available  
5.6 Toxicity by Ingestion: Grade 2, oral LD<sub>50</sub> = 2000 mg/kg  
5.7 Lethal Toxicity: Data not available  
5.8 Vapor (Gas) irritant Characteristics: vapors are irritating to eyes and throat  
5.9 Liquid or Solid irritant Characteristics: Causes irritation of the skin and first-degree burns on short exposure and may cause second-degree burns on long exposure  
5.10 Other Toxicity: Data not available  
5.11 IDLH Value: Data not available

NOTES

# Material Safety Data Sheet

from Genium's Reference Collection  
Genium Publishing Corporation  
1145 Catalyn Street  
Schenectady, NY 12303-1836 USA  
(518) 377-8855



GENIUM PUBLISHING CORP.

No. 22

CALCIUM OXIDE

(Revision C)

Issued: September 1978

Revised: April 1989

## SECTION 1. MATERIAL IDENTIFICATION

28

Material: CALCIUM OXIDE

Description (Origin/Uses): Used in the manufacture of steel, aluminum, glass, and paper; also found in plaster, mortar, bricks, stucco, and in other building and construction materials.

Other Designations: Lime; Quicklime; Burnt Unslaked Lime; High-Calcium Lime; CaO;  
CAS No. 1305-78-8

Manufacturer: Contact your supplier or distributor. Consult the latest edition of *Chemicalweek Buyers' Guide* (Genium ref. 73) for a list of suppliers.

HMIS

|      |   |   |   |
|------|---|---|---|
| H    | 1 | R | 1 |
| F    | 1 | I | 2 |
| R    | 0 | S | 3 |
| PPG* |   | K | 0 |



NFPA

\*See sect. 8

## SECTION 2. INGREDIENTS AND OCCUPATIONAL EXPOSURE LIMITS

Calcium Oxide, ca 100%

OSHA PEL

8-hr TWA: 5 mg/m<sup>3</sup>

ACGIH TLV, 1988-89

TLV-TWA: 2 mg/m<sup>3</sup>

Toxicity Data

Not Listed\*

\*Monitor NIOSH, RTECS (EW3100000), for future data.

## SECTION 3. PHYSICAL DATA

Bolling Point: 5162 °F (2850 °C)

Melting Point: 4658 °F (2570 °C)

pH: >10 (Strongly Basic)

Molecular Weight: 56 g/mol

Solubility in Water (%): Reacts

Specific Gravity (H<sub>2</sub>O = 1): 3.2 to 3.4

Appearance and Odor: A white or grayish white solid (it can appear yellowish or brownish if iron impurities are present; commercial calcium oxide is available in a wide variety of forms such as lumps, pellets, pebbles, and powders); odorless.

## SECTION 4. FIRE AND EXPLOSION DATA

Flash Point: \*

Autoignition Temperature: \*

LEL: \*

UEL: \*

Extinguishing Media: \*Calcium oxide will not burn. Use an extinguishing agent that will put out the surrounding fire. Water reacts dangerously with calcium oxide and is not recommended as an extinguishing agent for fires that involve it. If water must be used, prevent it from coming into direct contact with the calcium oxide. If such contact is unavoidable, apply the water in flooding amounts to safely absorb the heat that will be generated. Unusual Fire or Explosion Hazards: Do not allow water to get inside containers of calcium oxide; reaction with the water will cause the calcium oxide to swell, generate heat, and burst its container. The heat generated by this reaction may ignite nearby combustible materials. Special Fire-fighting Procedures: Wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in the pressure-demand or positive-pressure mode.

## SECTION 5. REACTIVITY DATA

Stability/Polymerization: Calcium oxide is stable in closed, airtight containers during routine work operations. Hazardous polymerization cannot occur. Chemical Incompatibilities: Calcium oxide can react dangerously with boric oxide and calcium chloride, boron trifluoride, chlorine trifluoride, fluorine, hydrofluoric acid, phosphorus pentoxide, and water. Conditions to Avoid: Control exposure to incompatible chemicals. Always establish the compatibility of calcium oxide with another material before using it in bulk operations by testing small quantities under appropriate conditions. Avoid exposing calcium oxide to air because it reacts with the ambient moisture and carbon dioxide. Hazardous Products of Decomposition: Oxides of calcium may be produced when calcium oxide reacts with other materials during fires.

## SECTION 6. HEALTH HAZARD INFORMATION

Carcinogenicity: Calcium oxide is not listed as a carcinogen by the NTP, IARC, or OSHA.

Summary of Risks: Calcium oxide is a strongly alkaline material; its contact with the skin, eyes, or inhalation results in severe irritation. Dust containing 25 mg/m<sup>3</sup> of this material causes strong nasal irritation; dust containing 9 to 10 mg/m<sup>3</sup> does not. The presence of moisture on the skin or on the mucous membrane of the respiratory system increases the possibility of corrosive tissue damage (chemical burns). Dehydration and thermal effects (the heat generated from reaction with water) are contributing factors to the irritating properties of calcium oxide. Medical Conditions Aggravated by Long-Term Exposure: None reported. Target Organs: Skin, eyes, nose, and respiratory system. Primary Entry: Inhalation and contact with skin and eyes. Acute Effects: Irritation and burns to the skin, eyes, and nose; irritation and inflammation of the respiratory system; coughing; and sneezing. Chronic Effects: Ulceration and perforation of the nasal septum, pneumonia. May cause nails to become brittle and fissure (split). (Cont'd.)

**SECTION 6. HEALTH HAZARD INFORMATION, continued****FIRST AID**

**Eyes:** Immediately flush eyes, including under the eyelids, gently but thoroughly with flooding amounts of running water for at least 15 minutes. An occupational ophthalmologist should monitor and treat the eye for calcium oxide burns. **Skin:** Do not rinse the affected area with water because severe skin damage is likely to occur if water is applied directly to the calcium oxide on the skin. Before wetting the calcium oxide, try to remove it from the skin with oil or grease; then apply water in a forcefully directed, powerful stream in flooding amounts that will mechanically and immediately remove the calcium oxide particles from the skin. **Inhalation:** Remove the exposed person to fresh air; restore and/or support his or her breathing as needed. Have qualified medical personnel administer oxygen as required. **Ingestion:** Unlikely. Get in plant, paramedic, or community medical help for all exposures. Seek prompt medical assistance for further treatment, observation, and support after first aid. **Note to Physician:** Severe exposure indicates hospitalization for 72 hours with careful monitoring for the delayed onset of pulmonary edema.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

**Spill/Leak:** Notify safety personnel, prevent accidental contact between the spilled calcium oxide and water, and avoid generating dust. Cleanup personnel need protection against its contact with skin or eyes as well as against inhalation of its dust (see sect. 8). Carefully pick up the solid, creating a minimum of dust, and collect it in metal containers with covers for disposal. Flush the trace residue in the spill area to a drain, using plenty of water.

**Waste Disposal:** Consider reclamation, recycling, or destruction rather than disposal in a landfill. Follow all applicable Federal, state, and local regulations. Large amounts of calcium oxide may require neutralization by acid before disposal. Flush any residue to a sewer after diluting it properly. Alternatively, the waste calcium oxide can be used for neutralizing plant acid waste.

**OSHA Designations**

Listed as an Air Contaminant (29 CFR 1910.1000 Subpart Z)

**EPA Designations**

Assigned the RCRA Hazardous Waste No. D003 (40 CFR 261.23)

Assigned the CERCLA Reportable Quantity (RQ): 100 lb (45.4kg) (40 CFR 302.5 (b))

**SECTION 8. SPECIAL PROTECTION INFORMATION**

**Goggles:** Always wear protective eyeglasses or chemical safety goggles. Follow OSHA eye- and face-protection regulations (29 CFR 1910.133).

**Respirator:** Consult Genium reference 88 for recommendations on selecting the proper respirator for use around calcium oxide. Follow OSHA respirator regulations (29 CFR 1910.134). For emergency or nonroutine operations (spills or cleaning reactor vessels and storage tanks), wear an SCBA. **Warning:** Air-purifying respirators will not protect workers in oxygen-deficient atmospheres.

**Other:** Wear dry rubber gloves, boots, aprons, gauntlets, and coveralls.

**Ventilation:** Install and operate general and local ventilation systems powerful enough to maintain airborne concentrations of calcium oxide below the OSHA PEL standard cited in section 2.

**Safety Stations:** Make emergency eyewash stations, safety/quick-drench showers, and washing facilities available in work areas.

**Contaminated Equipment:** Contact lenses pose a special hazard; soft lenses may absorb irritants, and all lenses concentrate them. Do not wear contact lenses in any work area. Remove contaminated clothing and launder it before wearing it again; clean this material from your shoes and equipment.

**Other:** Design all work operations in a way that does not generate dust and prevents water from being accidentally introduced into any part of a production system that contains calcium oxide.

**Comments:** Practice good personal hygiene; always wash thoroughly after using this material and before eating, drinking, smoking, using the toilet, or applying cosmetics. Keep it off your clothing and equipment. Avoid transferring it from your hands to your mouth while eating, drinking, or smoking. Do not eat, drink, or smoke in any work area.

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

**Storage/Segregation:** Store calcium oxide in sealed, dry, airtight containers in a cool, dry, well-ventilated area separate from incompatible chemicals (see sect. 5). Store it away from strong oxidizing agents, acids, organic materials, water, and combustibles.

**Special Handling/Storage:** Protect containers of calcium oxide from physical damage. Prevent water from contacting stored calcium oxide. To maintain the full effectiveness of this material, avoid extended contact with air.

**Comments:** Calcium oxide generates substantial heat when mixed with water. Prevent accidental mixing by following planned work procedures in all shipping, receiving, transferring, and production operations. When calcium oxide is deliberately mixed with water, undertake proper precautions to ensure that the resulting heat can be safely generated. *Always add calcium oxide to water; never add water to calcium oxide.*

Hazardous Materials Table (49 CFR 172.101)

DOT Shipping Name: Calcium Oxide

DOT Hazard Class: ORM-B

DOT ID No.: UN1910

DOT Label: None

References: 1, 26, 38, 84-94, 100, 116

Prepared by: PJ Igoe, BS; Industrial Hygiene Review: DJ Wilson, CIH; Medical Review: W Silverman, MD

# MATERIAL SAFETY DATA SHEET

GENIUM PUBLISHING CORPORATION  
1145 CATALYN STREET  
SCHENECTADY, NY 12303-1836 USA  
(518) 377-8855



No. 410

CARBON TETRACHLORIDE

Revision A

Date December 1980

## SECTION I. MATERIAL IDENTIFICATION

MATERIAL NAME: CARBON TETRACHLORIDE

OTHER DESIGNATIONS: Tetrachlormethane, Perchlormethane, Methane Tetrachloride,  $CCl_4$ , GE Material D5B50, CAS #000 056 235

MANUFACTURER: Available from several suppliers, including:  
Linden Chemicals & Plastics

PO Drawer J, Phone: (314) 843-1310  
Moundsville, WV 26041

## SECTION II. INGREDIENTS AND HAZARDS

Carbon Tetrachloride

\*ACGIH (1980 Intended Changes List). OSHA 8-hr TWA is 10 ppm. NIOSH has proposed a 10-hr TWA of 2 ppm. ACGIH and NIOSH recommend labeling as a suspected human carcinogen. (skin) notation indicates absorption through the skin can contribute significantly to overall exposure.

| x      | HAZARD DATA   |
|--------|---|
| ca 100 | 8-hr TWA 5 ppm (skin) or 30 mg/m <sup>3</sup> *               |
|        | Human, oral<br>LD10 43 mg/kg                                  |
|        | Human, inhalation<br>LCLo 1000 ppm<br>TCLo 20 ppm (CNS)       |
|        | Hamsters and mice have developed cancer on long term feeding. |

## SECTION III. PHYSICAL DATA

|                                  |       |                          |        |
|----------------------------------|-------|--------------------------|--------|
| Boiling point at 1 atm, deg C    | 76.7  | Specific gravity, 25/4 C | 1.585  |
| Vapor pressure @ 20 C, mm Hg     | ca 91 | Melting point, deg C     | -23    |
| Vapor density (Air=1)            | 5.3   | Volatiles, %             | ca 100 |
| Solubility in water @ 20 C, wt % | 0.08  | Molecular weight         | 153.8  |

Appearance & Odor: A clear, colorless liquid with a characteristic sweetish odor. Odor recognition threshold (100% of test panel): 21.4 ppm in air when prepared from  $CS_2$ ; 100 ppm in air when prepared from  $CH_4$ . Odor may not be objectionable at acutely toxic levels.

## SECTION IV. FIRE AND EXPLOSION DATA

| Flash Point and Method | Autoignition Temp. | Flammability Limits In Air | LOWER | UPPER |
|------------------------|--------------------|----------------------------|-------|-------|
|                        |                    |                            |       |       |

Extinguishing Media: It is nonflammable. Use that which is appropriate for the surrounding fire. Use water spray to cool fire-exposed containers. When involved in a fire situation, this material will emit highly toxic and irritating fumes and gases. Metals, such as aluminum and magnesium, can react violently with carbon tetrachloride when hot or burning. Firefighters must wear self-contained breathing apparatus and full protective gear to fight fires involving this material.

## SECTION V. REACTIVITY DATA

This material is stable under normal conditions of handling and use. It does not polymerize. Thermal-oxidative decomposition will produce toxic, corrosive fumes, including phosgene and hydrogen chloride. Violent reactions or explosions can occur with incompatible materials, such as barium, lithium, sodium, and potassium metal, powdered aluminum, magnesium, dimethylformamide (above 65 C), fluorine, etc. (See NFPA, "Manual of Hazardous Chemical Reactions".)

|  |  |
|--|--|
| <b>SECTION VI. HEALTH HAZARD INFORMATION</b> | <b>TLV 5 ppm (skin) (See Sect. II)</b> |
|--|--|

Carbon tetrachloride is highly toxic and irritating by inhalation and ingestion (mean lethal dose is 5-10 ml). It is toxic by skin absorption. Excessive exposure may result in CNS depression and/or gastrointestinal symptoms.\* It is irritating to skin and eyes. Eye contact or systemic effects can produce visual disturbances (haze, blind spots, narrowing of visual field, etc.). Skin contacts can cause defatting & dermatitis.

Kidney & liver damage can occur from severe acute or chronic exposure. It is a suspected carcinogen in humans.

**FIRST AID:**

**Eye Contact:** Flush eyes with running water for 15 minutes, including under the eyelids. Get medical help if irritation persists or when visual disturbances occur.

**Skin Contact:** Remove contaminated clothing promptly. Wash exposed skin with soap and water. Get medical help for repeated or gross exposures.

**Inhalation:** Remove to fresh air. Restore and/or support breathing; have qualified person administer oxygen if needed. Get medical help.

**Ingestion:** Contact physician for gastric lavage. (If medical help and advice is not readily available, give water to drink and induce vomiting.)

\*Also cardiac arrhythmias.

|  |
|--|
| <b>SECTION VII. SPILL, LEAK, AND DISPOSAL PROCEDURES</b> |
|--|

Notify safety personnel when large spills occur. Evacuate area. Provide maximum exhaust ventilation. Clean-up personnel must use protection against contact and inhalation (see Sect. VIII). Contain spill; pick up liquid for disposal. Small spills and residues can be absorbed on paper, vermiculite, etc. and allowed to evaporate in a hood. Prevent release of CCl<sub>4</sub> to surface water or sewers. Spills or discharges in 24 hours of 5000 lb or more (proposed RQ\* is 1000 lb) must be reported to U.S. Government.

**DISPOSAL:** Consider recovery and reuse, if feasible. Scrap may be burned in approved, high temperature incinerator with scrubber or it may be disposed of as hazardous waste (EPA number U211 or F001 as a spent degreasing solvent under RCRA). Follow Federal, State and Local regulations.

\*Reportable Quantity.

|   |
|---|
| <b>SECTION VIII. SPECIAL PROTECTION INFORMATION</b> |
|---|

Provide general and local exhaust ventilation to meet TLV. Exhaust hoods need 100 fpm min. face velocity. Ventilate sumps and low lying areas. Use air-supplied or self-contained respirators above TLV, with full face piece above 100 ppm.

PVA or neoprene gloves and protective clothing needed to prevent skin contact. Wear safety goggles and/or face shield for eye protection.

An eyewash station and chemical safety shower should be readily accessible.

Provide preplacement and twice a year medical exams. Workers with obesity, diabetes, alcoholism or pulmonary problems should have a physician's approval before working with CCl<sub>4</sub>. Retain medical records for 30 years after termination of employment.

Provide training to those exposed to CCl<sub>4</sub> in the workplace. Monitor vapor levels in the workplace.

|   |
|---|
| <b>SECTION IX. SPECIAL PRECAUTIONS AND COMMENTS</b> |
|---|

Store in closed containers in a cool, dry, well-ventilated, low fire-risk area. Protect containers against physical damage. Keep away from sources of heat, direct sunlight, and incompatible materials (see Sect. V). Prevent exposure of vapors to high temperature to prevent decomposition to toxic and corrosive gases and vapors. No smoking in areas where vapors may be present.

Prevent contact with the skin or eyes. Avoid exposure to vapors. Use good personal hygiene.

CCl<sub>4</sub> toxicity is markedly increased by the synergistic effects of alcohol. When possible, substitute a less hazardous solvent for CCl<sub>4</sub>. DOT Classification - ORM-A

DATA SOURCE(S) CODE: 1-12, 15, 16, 21-26, 31, 37, 38, 41

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|                                  |                                  |
|----------------------------------|----------------------------------|
| APPROVALS: MIS<br>CRD            | <i>J. M. [Signature]</i>         |
| Industrial Hygiene<br>and Safety | <i>J. M. [Signature]</i> 12-9-80 |
| MEDICAL REVIEW:                  | 16 Dec. 1980                     |

# Material Safety Data Sheet

From Genium's Reference Collection  
Genium Publishing Corporation  
1145 Catalyn Street  
Schenectady, NY 12303-1836 USA  
(518) 377-8855



No. 53

CHLORINE  
(Revision B)  
Issued: July 1979  
Revised: April 1988

## SECTION 1. MATERIAL IDENTIFICATION

25

Material Name: CHLORINE

Description (Origin/Uses): Used mainly to manufacture chlorinated lime for bleaching fabrics; as a versatile reagent in organic chemistry; in water purification; and as a military poison gas (bertholite).

Other Designations: Bertholite; Molecular Chlorine; Cl<sub>2</sub>; NIOSH RTECS No. FO2100000;  
CAS No. 7782-50-5

Manufacturer: Contact your supplier or distributor. Consult the latest edition of the *Chemicalweek Buyers' Guide* (Genium ref. 73) for a list of suppliers.

|              |     |
|--------------|-----|
| HMIS         |     |
| H 3          |     |
| F 0          | R 1 |
| R 1          | I 4 |
| PPG*         | S 4 |
| *See sect. 8 | K 0 |



## SECTION 2. INGREDIENTS AND HAZARDS

%

## EXPOSURE LIMITS

Chlorine, CAS No. 7782-50-5

ca 100

IDLH\* Level: 30 ppm  
OSHA PEL  
Ceiling: 1 ppm, 3 mg/m<sup>3</sup>  
TLV-STEL: 3 ppm, 9 mg/m<sup>3</sup>  
NIOSH REL  
15-Min Ceiling: 0.5 ppm, 1.45 mg/m<sup>3</sup>  
Toxicity Data\*\*  
Rat, Inhalation, LC<sub>50</sub>: 293 ppm (1 Hr)  
Mouse, Inhalation, LC<sub>50</sub>: 137 ppm (1 Hr)

\*Immediately dangerous to life and health  
\*\*See NIOSH, RTECS, for additional data with references to irritative and mutagenic effects.

## SECTION 3. PHYSICAL DATA

Boiling Point: ca -29°F (-34°C)  
Vapor Pressure: >760 Torr (Normal Atmospheric Pressure)  
Vapor Density (Air = 1): 1.4085 at 68°F (20°C)

Melting Point: ca -150°F (-101°C)  
Molecular Weight: 71 Grams/Mole  
Water Solubility: Slight

Appearance and Odor: A greenish yellow, noncombustible gas; pungent, suffocating, nauseating odor. Its odor-recognition threshold is reported to be ca 0.3 ppm.

## SECTION 4. FIRE AND EXPLOSION DATA

LOWER UPPER

| Flash Point and Method | Autoignition Temperature | Flammability Limits in Air |
|------------------------|--------------------------|----------------------------|
| .                      | .                        | % by Volume                |

Extinguishing Media: \*Chlorine will not burn, but it supports combustion of materials already involved in a fire. Use agents that will extinguish the surrounding fire. Use a water spray to cool fire-exposed tanks and to protect personnel attempting to stop a chlorine leak.  
Unusual Fire or Explosion Hazards: Chlorine is a reactive/explosive gas. Fight fires involving it from the maximum possible distance; this gas greatly increases the flammability hazards of other combustibles that are present. Warning: Flammable gases, vapors, and mists form dangerously explosive mixtures with chlorine gas.  
Special Fire-fighting Procedures: Wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in the pressure-demand or positive-pressure mode. Fire fighters must use the maximum personal protective equipment available. If possible, have specially trained personnel remove intact cylinders of chlorine from the fire area and protect them with any available resource such as directed water spray.

## SECTION 5. REACTIVITY DATA

Chlorine is stable in closed, pressurized containers at room temperature under normal storage and handling conditions. It does not undergo hazardous polymerization.

Chemical Incompatibilities: Chlorine reacts dangerously with acetylene, ammonia, hydrogen, ether, fuel gas, hydrocarbons, turpentine, finely divided metals, diborane, benzene, and acetaldehyde (see Genium ref. 84, pp. 49-28 and 491M-53 to 491M-56).

Conditions to Avoid: Do not allow open flame, unprotected heaters, lighted tobacco products, electric sparks, or excessive heat in work areas because chlorine gas can form explosive mixtures with other gases. Do not heat pressurized storage tanks or cylinders containing chlorine because they may explode. Do not allow chlorine to be directly exposed to incompatible chemicals (see above).

Hazardous Products of Decomposition: Toxic gases such as carbon monoxide, phosgene, and hydrogen chloride (Genium Industrial MSDSs 35, 66, 30) can be produced in fires involving chlorine and other combustibles.

**SECTION 6. HEALTH HAZARD INFORMATION**

Chlorine is not listed as a carcinogen by the NTP, IARC, or OSHA.

**Summary of Risks, Warning:** This material is a powerful respiratory irritant. The most important acute health effect of exposure is lung damage from hydrochloric acid (HCl) caused by the reaction of chlorine with the moisture in the upper respiratory tract (URT). Fatal pulmonary edema (lungs filled with fluid) may be delayed from 24 to 48 hours after exposure. Erosion of teeth, decreased lung capacity, and increased susceptibility to tuberculosis are chronic effects in workers who handle this gas. **Medical Conditions Aggravated by Long-Term Exposure:** Cardiac, pulmonary, or respiratory problems. Administer preplacement and periodic medical exams emphasizing the respiratory system to workers who regularly handle chlorine. **Target Organs:** Respiratory system. **Primary Entry:** Inhalation, skin contact. **Acute Effects:** Burning and severe irritation of the eyes, skin, and URT; wheezing, shortness of breath; nausea; vomiting; headache; dizziness; and (delayed) pulmonary edema. **Chronic Effects:** Reduced respiratory capacity may result from chronic low-level exposure to chlorine.

**FIRST AID:** **Eyes.** Immediately flush eyes, including under the eyelids, gently but thoroughly with plenty of running water for at least 15 minutes. **Skin.** Skin contact with chlorine causes severe damage from frostbite (cryogenic injury) as well as chemical burns. Irrigate the area with water and treat the exposed person accordingly. **Inhalation.** Remove exposed person to fresh air; restore and/or support his or her breathing as needed. Recommended treatment includes administering pure oxygen gas (O<sub>2</sub>) as soon as symptoms of exposure develop (Genium ref. 39, p. 1975). Observe exposed person for respiratory effects. **Ingestion.** This type of exposure to chlorine is highly unlikely because it is a gas.

**GET MEDICAL HELP (IN PLANT, PARAMEDIC, COMMUNITY) FOR ALL EXPOSURES.** Seek prompt medical assistance for further treatment, observation, and support after first aid.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

**Spill/Leak:** Preplan and carefully explain proper emergency procedures to relevant personnel. Notify safety personnel, evacuate all non-essential personnel, provide maximum explosion-proof ventilation, and eliminate all sources of ignition immediately. Cleanup personnel must wear protection against contact with and inhalation of vapor (see sect. 8). Try to shut off the flow of chlorine gas. Use a water spray to protect personnel attempting to stop the leak.

**Waste Disposal:** Contact your supplier or a licensed contractor for detailed recommendations. Follow Federal, state, and local regulations.

**OSHA Designations**

Air Contaminant (29 CFR 1910.1000 Subpart Z): Not Listed

EPA Designations (40 CFR 302.4)

RCRA Hazardous Waste: Listed without Number

CERCLA Hazardous Substance, Reportable Quantity: 10 lbs (4.54 kg)

**SECTION 8. SPECIAL PROTECTION INFORMATION**

**Goggles:** Always wear protective eyeglasses or chemical safety goggles. Follow the eye- and face-protection guidelines in 29 CFR 1910.133. **Respirator:** Use a NIOSH-approved respirator per the *NIOSH Pocket Guide to Chemical Hazards* for the maximum-use concentrations and/or the exposure limits cited in section 2. Follow the respirator guidelines in 29 CFR 1910.134. For emergency or nonroutine use (e.g., cleaning reactor vessels or storage tanks) wear an SCBA with a full facepiece operated in the pressure-demand or positive-pressure mode. **Warning:** Air-purifying respirators will not protect workers in oxygen-deficient atmospheres. **Other:** Wear impervious gloves; boots; aprons; and clean, impervious, body-covering clothing to prevent any possibility of skin contact. **Ventilation:** Install and operate general and local ventilation systems powerful enough to maintain airborne levels of chlorine gas strictly below the OSHA PEL standard cited in section 2. Make all ventilation systems of maximum explosion-proof design, e.g., nonsparking, electrically grounded and bonded, etc. **Safety Stations:** Make eyewash stations, washing facilities, and safety showers available in areas of use and handling. **Contaminated Equipment:** Contact lenses pose a special hazard; soft lenses may absorb irritants, and all lenses concentrate them. Do not wear contact lenses in any work area. **Other:** Use enclosed-containment processing operations; otherwise, the ventilation systems may not be able to keep airborne levels of chlorine below the legal ceiling limit of 1 ppm (3 mg/m<sup>3</sup>) set by OSHA. **Automatic air-monitoring sensing equipment** connected to an alarm system is recommended for continual-use operations. **Comments:** Practice good personal hygiene; always wash thoroughly after using this material. Avoid transferring it from your hands to your mouth while eating, drinking, or smoking. Do not eat, drink, or smoke in any work area. Avoid prolonged skin contact with this material.

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

**Storage/Segregation:** Store chlorine in a cool, dry, well-ventilated area away from organics, sources of ignition, any flammable or explosive materials, cylinders containing oxygen, and incompatible chemicals (see sect. 5). Use outside or detached storage. Store cylinders upright and secure them tightly. **Special Handling/Storage:** Chlorine is shipped/stored as a pressurized gas in cylinders or tank cars. Protect them against physical damage and regularly inspect them for cracks, leaks, or faulty valves. Follow standard safety procedures for handling compressed, corrosive gases. Electrically ground and bond all containers used in shipping and transfer operations to prevent static sparks. Do not drag or slide cylinders containing chlorine; move them in a carefully supervised manner with a suitable hand truck. Do not smoke in use or storage areas. **Engineering Controls:** All engineering systems (ventilation, production, etc.) must be of maximum explosion-proof design. Use chlorine in closed engineering systems to prevent dispersion of this gas into general work areas. Monitor all piping systems, reactor vessels, and holding tanks for unwanted moisture contamination or buildup. Liquid chlorine levels should be less than 85% of a tank's or cylinder's capacity. **Comments:** Perform all operations with chlorine carefully to prevent accidental ignition of explosive mixtures. Prevent any contact with incompatible chemicals (see sect. 5). Keep the valve-protection cap in place until immediately before using chlorine. Insert a check valve or trap into the transfer line to prevent a dangerous backflow into the original container. Use a pressure-reducing regulator when connecting a storage vessel to a lower-pressure piping system. A trained chemist or safety specialist familiar with the physical and chemical properties of this gas should be present during all work operations.

Transportation Data (49 CFR 172.101-2)

DOT Shipping Name: Chlorine

DOT Class: Nonflammable Gas

References: 1, 2, 12, 73, 84-94, 100, 103.

DOT Label: Nonflammable Gas and Poison  
DOT ID No. UN1017

IMO Label: Poison Gas  
IMO Class: 2.3

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Prepared by PJ Igoe, BS

Industrial Hygiene Review: DJ Wilson, CIH

Medical Review: MJ Hardies, MD

# Material Safety Data Sheet

From Genium's Reference Collection  
Genium Publishing Corporation  
1145 Catalyn Street  
Schenectady, NY 12303-1836 USA  
(518) 377-8855



No. 315

CHLOROFORM  
(Revision D)  
Issued: August 1979  
Revised: April 1988

## SECTION 1. MATERIAL IDENTIFICATION

25

Material Name: CHLOROFORM

Description (Origin/Uses): Used as a solvent for fats, oils, rubber, alkaloids, waxes, and resins; as a cleansing agent.

Other Designations: Trichloromethane; CHCl<sub>3</sub>; NIOSH RTECS No. FS9100000; CAS No. 0067-66-3

Manufacturer: Contact your supplier or distributor. Consult the latest edition of the *Chemicalweek Buyers' Guide* (Genium ref. 73) for a list of suppliers.

|              |   |
|--------------|---|
| HMIS         |   |
| H            | 2 |
| F            | 0 |
| R            | 0 |
| PPG*         |   |
| *See sect. 8 |   |
| R            | 1 |
| I            | 3 |
| S            | 2 |
| K            | 0 |



## SECTION 2. INGREDIENTS AND HAZARDS

Chloroform, CAS No. 0067-66-3

%  
Ca 100

### EXPOSURE LIMITS

OSHA PEL  
Ceiling: 50 ppm, 240 mg/m<sup>3</sup>

ACGIH TLV, 1987-88  
TLV-TWA: 10 ppm, 50 mg/m<sup>3</sup>

NIOSH REL  
Ceiling: 2 ppm, 9.78 mg/m<sup>3</sup>

Toxicity Data\*  
Human, Oral, LD<sub>50</sub>: 140 mg/kg  
Rat, Oral, LD<sub>50</sub>: 908 mg/kg

\*See NIOSH, RTECS, for additional toxicity data with references to mutagenic, reproductive, tumorigenic, and irritative effects.

## SECTION 3. PHYSICAL DATA

Boiling Point: 142°F (61°C)

Melting Point: -82.3°F (-63.5°C)

Vapor Pressure: 158.4 Torr at 68°F (20°C)

Vapor Density (Air = 1): 4.13

Water Solubility (%): 0.822 ml of CHCl<sub>3</sub> per 100 ml of H<sub>2</sub>O at 68°F (20°C)

% Volatile by Volume: 100

Molecular Weight: 119 Grams/Mole

Specific Gravity (H<sub>2</sub>O = 1): 1.484 at 68°F (20°C)

Appearance and Odor: A heavy, colorless, clear, volatile liquid; characteristic, pleasant, ethereal, sweet odor (recognition threshold: 0.3 mg/m<sup>3</sup>); sweet taste.

## SECTION 4. FIRE AND EXPLOSION DATA

Flash Point and Method

Autoignition Temperature

Flammability Limits in Air

LOWER

UPPER

% by Volume

Extinguishing Media: \*Chloroform does not burn. Use an agent that will put out the surrounding fire.

Unusual Fire or Explosion Hazards: None reported.

Special Fire-fighting Procedures: Wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in the pressure-demand or positive-pressure mode.

## SECTION 5. REACTIVITY DATA

Chloroform is stable if kept in closed containers and protected from air and sunlight. It does not undergo hazardous polymerization; however, even when stabilized with ethanol, this material develops acidity from prolonged exposure to air and light.

Chemical Incompatibilities: This material is incompatible with strong alkalis.

Conditions to Avoid: Avoid prolonged exposure to air and light and to strong alkalis.

Hazardous Products of Decomposition: Toxic and corrosive gases like hydrochloric acid (HCl), chlorine (Cl<sub>2</sub>), carbon monoxide (CO), and oxides of chlorine (ClO<sub>x</sub>) can be produced during fires.

**SECTION 6. HEALTH HAZARD INFORMATION**

Chloroform is listed as a suspected human carcinogen by ACGIH.

**Summary of Risks:** Exposure to this material affects the central nervous system (anesthesia); heart (arrhythmia, ventricular tachycardia, bradycardia); liver (necrosis, hepatoma); kidney (necrosis); and it is an embryonic toxin. Fatalities are associated with cardiovascular depression and ventricular fibrillation.

**Medical Conditions Aggravated by Long-Term Exposure:** Ailments of the heart, liver, and kidneys may be worsened by exposure to chloroform. **Target Organs:** Liver, kidneys, heart, skin, eyes. **Primary Entry:** Skin contact, inhalation.

**Acute Effects:** Dizziness, mental dullness, nausea, headache, fatigue, and anesthesia. **Chronic Effects:** Possible cancer.

**FIRST AID**

**Eyes:** Immediately flush eyes, including under the eyelids, gently but thoroughly with plenty of running water for at least 15 minutes. **Skin:** Immediately wash the affected area with soap and water. **Inhalation:** Remove the exposed person to fresh air; restore and/or support his or her breathing as needed.

**Ingestion:** Never give anything by mouth to someone who is unconscious or convulsing. If the exposed person is responsive, give him or her several glasses of milk or water to drink and induce vomiting. Repeat if large quantities were ingested.

**Comments:** Workers who are regularly exposed to chloroform require preplacement and periodic medical exams emphasizing kidney, liver, skin, and central nervous system functions. Carefully evaluate each exposure that produces a noticeable effect to determine the extent to which factors like alcohol or drugs have affected it.

**GET MEDICAL HELP (IN PLANT, PARAMEDIC, COMMUNITY) FOR ALL EXPOSURES.** Seek prompt medical assistance for further treatment, observation, and support after first aid.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

**Spill/Leak:** Notify safety personnel of a chloroform spill or leak. Provide ventilation. Cleanup personnel need protection against contact with and inhalation of vapor (see sect. 8). Chloroform vapor is heavier than air and will collect in low-lying areas. Contain large spills and collect waste or absorb it with an inert material such as sand, earth, or vermiculite. Place waste liquid or absorbent into closable containers for disposal. Keep waste out of sewers, watersheds, and waterways.

**Waste Disposal:** Contact your supplier or a licensed contractor for detailed recommendations. Follow Federal, state, and local regulations.

**OSHA Designations**

Air Contaminant (29 CFR 1910.1000 Subpart Z)

EPA Designations (40 CFR 302.4)

RCRA Hazardous Waste, No. U044

CERCLA Hazardous Substance, Reportable Quantity: 5000 lbs (2270 kg)

**SECTION 8. SPECIAL PROTECTION INFORMATION**

**Goggles:** Always wear protective eyeglasses or chemical safety goggles. Where splashing is possible, wear a full face shield as a supplementary protective measure. Follow the eye- and face-protection guidelines in 29 CFR 1910.133. **Respirator:** Wear a NIOSH-approved respirator per the *NIOSH Pocket Guide to Chemical Hazards* for the maximum-use concentrations and/or the exposure limits cited in section 2. Follow the respirator guidelines in 29 CFR 1910.134. For emergency or nonroutine use (e.g., cleaning reactor vessels or storage tanks), wear an SCBA with a full facepiece operated in the pressure-demand or positive-pressure mode. **Warning:** Air-purifying respirators will not protect workers in oxygen-deficient atmospheres. **Other:** To prevent contact with skin, wear impervious gloves, boots, aprons, gauntlets, etc., as required by the specific work environment. **Ventilation:** Install and operate general and local ventilation systems that are powerful enough to maintain airborne levels of chloroform below the OSHA PEL standard cited in section 2. **Safety Stations:** Make eyewash stations, washing facilities, and safety showers available in use and handling areas. **Contaminated Equipment:** Contact lenses pose a special hazard; soft lenses may absorb irritants and all lenses concentrate them. Do not wear contact lenses in any work area. Remove contaminated clothing and launder it before wearing it again; clean this material from shoes and equipment. **Comments:** Practice good personal hygiene; always wash thoroughly after using this material. Keep it off of your clothing and equipment. Avoid transferring it from your hands to your mouth while eating, drinking, or smoking. Do not eat, drink, or smoke in any work area. Avoid inhalation of vapor!

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

**Storage/Segregation:** Store chloroform in closed containers away from light and alkalis.

**Special Handling/Storage:** Protect containers from physical damage. Do not transfer chloroform through plastic or rubber hoses or pipes.

**Transportation Data (49 CFR 172.101-2)**

**DOT Shipping Name:** Chloroform

**DOT Class:** ORM-A

**DOT Label:** None

**DOT ID No.:** UN1888

**IMO Label:** Poison

**IMO Class:** 6.1

**References:** 1, 2, 12, 73, 84-94, 100, 103.

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Prepared by PJ Igoe, BS

Industrial Hygiene Review: DJ Wilson, CIH

Medical Review: MJ Hardies, MD

CEDAR CHEMICAL CORPORATION  
MEMPHIS, TENNESSEE

MATERIAL SAFETY DATA SHEET  
Equivalent to OSHA form 174

-----  
PRODUCT NAME: TECHNICAL DINOSEB                      DATE: 08/15/86                      PAGE 1  
EPA REG. NO.: 56077-3

-----  
SECTION I

-----  
Manufacturer's Name: Cedar Chemical Corporation  
5100 Poplar Ave. 24th Floor  
Memphis, TN 38157  
Emergency Phone Number: 1-800-424-9300  
Information Phone Number: 1-601-656-1231  
Prepared by: M. S. Bernard

-----  
SECTION II HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

| INGREDIENT   | OSHA PEL | ACGIH TLV            | PERCENT |
|--|----------|----------------------|---------|
| Dinoseb  | n/d      | 0.3mg/m <sup>3</sup> | 95.00   |
| Dinoseb (2-sec-butyl-4,6-dinitrophenol)<br>CAS = 88-85-7 |          |                      |         |
| Impurities   | n/d      | n/d                  | 5.00    |

-----  
SECTION III PHYSICAL/CHEMICAL CHARACTERISTICS

|                        |                                |                   |       |
|------------------------|--------------------------------|-------------------|-------|
| Boiling Point(°F)      | above 212                      | Specific Gravity  | 1.258 |
| Vapor Pressure(mm Hg.) | below 1                        | Melting Point(°F) | 90    |
| Vapor Density(Air=1)   | n/a                            | Evaporation Rate  | n/d   |
| Solubility in Water:   | 0.0052g/100ml                  |                   |       |
| Appearance and Odor:   | Brown solid, organic acid odor |                   |       |

-----  
SECTION IV FIRE AND EXPLOSION HAZARD DATA

Flash Point(Method Used): 350.6°F TCC  
Flammable Limits: LEL- n/d UEL- n/d  
Extinguishing Media:  
Water Fog, Foam, Alcohol Foam, CO<sub>2</sub>, and Dry Chemical

CONTINUED ON PAGE 2

Special Fire Fighting Procedures:

Self-contained air supply. Confine water used in fire fighting.

Unusual Fire and Explosion Hazards:

Noxious fumes may form. Material undergoes rapid exothermic decomposition at 190°C. Vapors may ignite.

-----  
SECTION V REACTIVITY DATA  
-----

Stability: Stable in normal use and storage.

Conditions to Avoid: Heating above 100°C. Product undergoes rapid exothermic decomposition at 190°C. Avoid ignition sources.

Incompatibility: Strong Bases and Strong Oxidizers

Hazardous Decomposition or Byproducts: Oxides of Nitrogen

Hazardous Polymerization: Will not occur. No known conditions to avoid.

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SECTION VI HEALTH HAZARD DATA  
-----

Route(s) of Entry: Inhalation: Moderate Toxicity  
Skin: Readily Absorbed  
Ingestion: Highly Toxic

Health Hazards (Acute and Chronic):

Oral Ingestion: High Single Dose Oral Toxicity.  
LD<sub>50</sub> for Rats 25 mg/kg.  
May be fatal if swallowed.

Eye Contact: May cause severe irritation and corneal injury. Corneal injury should heal in 1-2 weeks.

Skin Contact: May cause slight irritation or mild burn. Colors the skin yellow.

Skin Absorption: Readily absorbed through skin, high toxicity. LD<sub>50</sub> rabbits 80mg/kg.

Inhalation: May be irritating. Cedar industrial guide for Dinoseb is 0.3 mg/m<sup>3</sup>.

Carcinogenicity: NTP: Negative  
IARC Monographs: Negative  
OSHA Regulated: Negative

Signs and Symptoms of Exposure: Fatigue, sweating, thirst, and fever.  
Increased metabolic rate.

Medical Conditions Generally Aggravated by Exposure: Liver and kidney problems may be aggravated by extreme exposure.

**Emergency and First Aid Procedures:**

- Oral Ingestion:** Toxic by ingestion. Induce vomiting and seek medical help immediately.
- Eye Contact:** Flush immediately with continuous irrigation with flowing water for at least thirty minutes. Seek medical consultation immediately.
- Skin Contact:** Immediately flush skin with plenty of water for at least fifteen minutes while removing contaminated clothing. Consult physician. Wash clothing before reuse.
- Inhalation:** Remove to fresh air if effects occur. Consult physician.

**Note to Physician:**

**Eyes:** Stain for evidence of corneal injury. If cornea is burned, instill antibiotic steroid preparation frequently. Consult ophthalmologist. May cause temporary injury.  
**Overexposure:** Treat for symptoms. No specific antidote.  
 Human effects not established.

-----  
**SECTION VII PRECAUTIONS FOR SAFE HANDLING AND USE**  
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**Steps to Be Taken in Case Material Is Released or Spilled:**

Use proper safety equipment. Absorb spill with absorbant inert material such as oil-dry. Dike area for large spills. Keep out of streams and water supplies.

**Waste Disposal Method:**

Dispose of in non-crop area away from water supplies or in an approved landfill in accordance with State, Federal, and local regulations.

**Precautions to Be Taken in Handling and Storing:**

Do not get on skin, on clothing, or in eyes. Keep out of reach of children.

**Other Precautions:**

Do not breathe spray mists. Keep away from heat or flame.

-----  
**SECTION VIII CONTROL MEASURES**  
 -----

**Respiratory Protection:**

None normally needed. During spraying use organic vapor respirator.

**Ventilation:** Required to control level of dinoseb.

**Protective Gloves:** Impervious rubber gloves

**Eye Protection:** Chemical workers' goggles

**Other Protective Clothing or Equipment:** Rubber boots and apron and body-covering clothing.

**Hygienic Practices:** Shower after handling.

THE INFORMATION HEREIN IS SUPPLIED IN GOOD FAITH.  
 BUT NO WARRANTY, EXPLICIT OR IMPLIED, IS MADE.

# Material Safety Data Sheet

from Genium's Reference Collection  
Genium Publishing Corporation  
1145 Catalyn Street  
Schenectady, NY 12303-1836 USA  
(518) 377-8855



No. 385

ETHYL BENZENE

(Revision A)

Issued: August 1978

Revised: November 1988

## SECTION 1. MATERIAL IDENTIFICATION

Material Name: ETHYL BENZENE

Description (Origin/Uses): Used as a solvent and as an intermediate in the production of styrene monomer.

Other Designations: Phenylethane; Ethylbenzol;  $C_8H_{10}$ ; CAS No. 0100-41-4

Manufacturer: Contact your supplier or distributor. Consult the latest edition of the *Chemicalweek Buyers' Guide* (Genium ref. 73) for a list of suppliers.



HMS  
H 2 R 1  
F 3 I 3  
R 0 S 2  
PPG\* K 4  
\*See sect. 8

## SECTION 2. INGREDIENTS AND HAZARDS

Ethyl Benzene, CAS No. 0100-41-4

### EXPOSURE LIMITS

Ca 100

#### OSHA PELs

8-Hr TWA: 100 ppm, 435 mg/m<sup>3</sup>

15-Min STEL: 125 ppm, 545 mg/m<sup>3</sup>

#### ACGIH TLVs, 1988-89

TLV-TWA: 100 ppm, 435 mg/m<sup>3</sup>

TLV-STEL: 125 ppm, 545 mg/m<sup>3</sup>

#### Toxicity Data\*

Human, Inhalation,  $TC_{50}$ : 100 ppm (8 Hrs)

Rat, Oral,  $LD_{50}$ : 3500 mg/kg

\*See NIOSH, *RTECS* (DA0700000), for additional data with references to reproductive, irritative, and mutagenic effects.

## SECTION 3. PHYSICAL DATA

Bolling Point: 277°F (136°C)

Melting Point: -139°F (-95°C)

Vapor Pressure: 7.1 Torr at 68°F (20°C)

Vapor Density (Air = 1): 3.7

% Volatile by Volume: Ca 100

Molecular Weight: 106 Grams/Mole

Solubility in Water (%): Slight

Specific Gravity ( $H_2O = 1$ ): 0.86258 at 77°F (25°C)

Appearance and Odor: A clear, colorless, flammable liquid; characteristic aromatic hydrocarbon odor.

## SECTION 4. FIRE AND EXPLOSION DATA

Flash Point and Method: 64°F (18°C) CC

Autoignition Temperature: 810°F (432.22°C)

LEL: 1% v/v

UEL: 6.7% v/v

Extinguishing Media: Use foam, dry chemical, or carbon dioxide to put out ethyl benzene fires. A water spray may be ineffective in extinguishing the fire, because it can scatter and spread the burning liquid. Use water spray to cool fire-exposed containers of ethyl benzene, to disperse ethyl benzene vapor, and to protect personnel attempting to stop an ethyl benzene leak. Unusual Fire or Explosion Hazards: This liquid can readily form explosive vapor-air mixtures, especially when heated. Ethyl benzene vapor is heavier than air and may travel a considerable distance to a low-lying source of ignition and flash back to its origin. Special Fire-fighting Procedures: Wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in the pressure-demand or positive-pressure mode.

## SECTION 5. REACTIVITY DATA

Stability/Polymerization: Ethyl benzene is stable in closed containers during routine operations. Hazardous polymerization cannot occur.

Chemical Incompatibilities: Hazardous chemical reactions can occur between ethyl benzene and strong oxidizing agents, acids, ammonia, and bases. Conditions to Avoid: Avoid any exposure to sources of ignition such as heat, sparks, open flame, and lighted tobacco products, etc., and to incompatible chemicals. Use caution when entering confined spaces, particularly low-lying areas where explosive concentrations of ethyl benzene vapor may be present. Provide good ventilation to such areas to prevent the concentration of this vapor. Hazardous Products of Decomposition: Thermal-oxidative degradation can include toxic gases such as carbon monoxide and/or aromatic hydrocarbon gases.

## SECTION 6. HEALTH HAZARD INFORMATION

Carcinogenicity: Ethyl benzene is not listed as a carcinogen by the NTP, IARC, or OSHA.

Summary of Risks: Ethyl benzene vapor is severely irritating to the eyes and to the mucous membranes of the respiratory system. Sustained inhalation of excessive levels can cause depression of the central nervous system (CNS) characterized by dizziness, headache, narcosis, and coma. Skin contact with liquid ethyl benzene causes irritation; dermatitis and defatting can also develop. The acute oral toxicity of ethyl benzene is low; however, ingestion of it presents a serious aspiration hazard. Aspirating even a small amount into the lungs can result in extensive edema (lungs filled with fluid) and hemorrhaging of the lung tissue. No systemic effects are expected at the levels that produce pronounced, unignorable, disagreeable skin and eye irritation. The TLVs cited in section 2 are set to prevent this intolerable irritation. Medical Conditions Aggravated by Long-Term Exposure: None reported. Target Organs: Skin, eyes, respiratory system, and CNS. Primary Entry: Inhalation, skin contact. Acute Effects: Irritation of the skin, eyes, and respiratory system. Also, cardiac-rhythm disturbance due to sensitization: acute bronchitis, bronchospasm, pulmonary and laryngeal edema; euphoria; headache; giddiness; dizziness; and incoordination, as well as possible depression; confusion; and coma. Chronic Effects: None reported. First Aid: Eyes. Immediately

**SECTION 6. HEALTH HAZARD INFORMATION, cont.**

flush eyes, including under the eyelids, gently but thoroughly with flooding amounts of running water for at least 15 minutes. Skin. Rinse the affected area with plenty of water, then wash it with soap and water. Inhalation. Remove the exposed person to fresh air; restore and/or support his or her breathing as needed. Have qualified medical personnel administer oxygen as required. Ingestion. Unlikely. Should this type of exposure occur, the aspiration hazard must be considered. Do not induce vomiting unless directed to do so by a physician. To prevent aspiration by spontaneous vomiting, keep the victim's head low (between his or her knees). Get medical help (in plant, paramedic, community) for all exposures. Seek prompt medical assistance for further treatment, observation, and support after first aid. Note to Physician: Professional judgment is required as to whether or not to induce vomiting because of the possibility of aspiration. A gastric lavage may be administered, followed by saline catharsis, if this procedure is appropriate to the specific incident. Monitor cardiac and pulmonary functions.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

**Spill/Leak:** Notify safety personnel, evacuate unnecessary personnel, eliminate all sources of ignition immediately, and provide adequate explosion-proof ventilation. Cleanup personnel need protection against skin or eye contact with this liquid as well as inhalation of its vapor (see sect. 8). Contain large spills and collect waste or absorb it with an inert material such as sand, earth, or vermiculite. Use nonsparking tools to place waste liquid or absorbent into closable containers for disposal. Keep waste out of sewers, watersheds, and waterways. Waste Disposal: Contact your supplier or a licensed contractor for detailed recommendations. Follow Federal, state, and local regulations.

**OSHA Designations**

Lined as an Air Contaminant (29 CFR 1910.1000 Subpart Z).

EPA Designations (40 CFR 302.4)

CERCLA Hazardous Substance, Reportable Quantity: 1000 lbs (454 kg), per the Clean Water Act (CWA), §§ 311 (b) (4) and 307 (a).

**SECTION 8. SPECIAL PROTECTION INFORMATION**

**Goggles:** Always wear protective eyeglasses or chemical safety goggles. Where splashing is possible, wear a full face shield. Follow OSHA eye- and face-protection regulations (29 CFR 1910.133). **Respirator:** Wear a NIOSH-approved respirator per Genium reference 88 for the maximum-use concentrations and/or the exposure limits cited in section 2. Follow OSHA respirator regulations (29 CFR 1910.134). For emergency or nonroutine operations (spills or cleaning reactor vessels and storage tanks), wear an SCBA. **Warning:** Air-purifying respirators will not protect workers in oxygen-deficient atmospheres. **Other:** Wear impervious gloves, boots, aprons, and gauntlets, etc., to prevent prolonged or repeated skin contact with this material. **Ventilation:** Install and operate general and local maximum, explosion-proof ventilation systems powerful enough to maintain airborne levels of this material below the OSHA PEL standard cited in section 2. Local exhaust ventilation is preferred because it prevents dispersion of the contaminant into the general work area by eliminating it at its source. Consult the latest edition of Genium reference 103 for detailed recommendations. **Safety Stations:** Make emergency eyewash stations, safety/quick-drench showers, and washing facilities available in work areas. **Contaminated Equipment:** Contact lenses pose a special hazard; soft lenses may absorb irritants, and all lenses concentrate them. Do not wear contact lenses in any work area. Remove contaminated clothing and launder it before wearing it again; clean this material from shoes and equipment. **Comments:** Practice good personal hygiene; always wash thoroughly after using this material and before eating, drinking, smoking, using the toilet, or applying cosmetics. Keep it off your clothing and equipment. Avoid transferring it from your hands to your mouth while eating, drinking, or smoking. Do not eat, drink, or smoke in any work area. Do not inhale ethyl benzene vapor.

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

**Storage/Segregation:** Store ethyl benzene in closed containers in a cool, dry, well-ventilated area away from sources of ignition and strong oxidizers. Protect containers from physical damage. **Special Handling/Storage:** Outside, isolated, detached, or remote storage is recommended for large quantities of ethyl benzene. Isolate bulk storage areas from acute fire hazards. **Engineering Controls:** Make sure all engineering systems (production, transportation) are of maximum explosion-proof design. To prevent static sparks, electrically ground and bond all containers, pipelines, etc., used in shipping, transferring, reacting, production, and sampling operations. **Other:** Use safety cans for transferring small amounts of ethyl benzene.

**Transportation Data (49 CFR 172.101-2)**

DOT Shipping Name: Ethyl Benzene

DOT Hazard Class: Flammable Liquid

ID No. UN1175

DOT Label: Flammable Liquid

DOT Packaging Exceptions: 49 CFR 173.118

DOT Packaging Requirements: 49 CFR 173.119

IMO Shipping Name: Ethylbenzene

IMO Hazard Class: 3.2

IMO Label: Flammable Liquid

IMDG Packaging Group: II

References: 1, 26, 38, 84-94, 100, 116, 117, 120, 122.

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Prepared by PJ Igoe, BS

Industrial Hygiene Review: DJ Wilson, CIH

Medical Review: W Silverman, MD

# METHANEARSONIC ACID, SODIUM SALT

MSA

|   |  |
|---|--|
| <p><b>Common Synonyms</b><br/>                 Disodium methano arsenate<br/>                 Monosodium methano arsenate<br/>                 MSMA<br/>                 DSMA<br/>                 Disodium methyl arsenate<br/>                 Monosodium methyl arsenate</p> | <p><b>Solid</b></p> <p><b>Colorless solid, granules may be red or green</b></p> <p><b>Solid may melt or melt in water; melt and solution may turn clear.</b></p> |
|---|--|

See description if needed  
 Avoid contact with skin and clothes  
 Avoid eye contact and inhaling material  
 Notify local health and pollution control agencies

|                    |  |
|--------------------|--|
| <p><b>Fire</b></p> | <p><b>Not flammable</b><br/> <b>OXIDIZING GASES ARE PRODUCED WHEN HEATED</b><br/> <b>Under oxygen and concentrated sulfuric acid</b></p> |
|--------------------|--|

|                        |  |
|------------------------|--|
| <p><b>Exposure</b></p> | <p><b>CALL FOR MEDICAL AID</b></p> <p><b>SOLID OR SOLUTION</b><br/>                 Irritating to skin and eyes<br/>                 If swallowed, see health hazard, vomiting, or loss of consciousness<br/>                 Repeated concentrations causing eye irritation<br/>                 Fresh granules green with purity of water<br/>                 If in EYES, flush eyes with water and flush with plenty of water<br/>                 IF SWALLOWED and victim is CONSCIOUS, have victim drink water or milk and have victim induce vomiting<br/>                 IF SWALLOWED and victim is UNCONSCIOUS OR HAVING CONVULSIONS, do nothing except keep victim warm</p> |
|------------------------|--|

|                               |   |
|-------------------------------|---|
| <p><b>Water Pollution</b></p> | <p>Dangerous to aquatic life in high concentrations<br/>                 May be discharged if it causes water changes<br/>                 Notify local health and pollution agencies<br/>                 Notify operators of nearby water intakes</p> |
|-------------------------------|---|

|  |  |
|--|--|
| <p><b>1. RESPONSE TO DISCHARGE</b><br/>                 (See Response Methods Handbook)<br/>                 Treat as "Impoundment water" as shown<br/>                 Should be removed<br/>                 Chemical and physical treatment</p> | <p><b>2. LABEL</b><br/>                 2.1 Category: Poison<br/>                 2.2 Class: 6</p> |
|--|--|

|  |  |
|--|--|
| <p><b>3. CHEMICAL DESIGNATIONS</b><br/>                 3.1 CAS Compatibility Chart: Not listed<br/>                 3.2 Formula: <math>\text{CH}_3\text{AsO}_2\text{Na}_2</math><br/> <math>\text{CH}_3\text{AsO}_2\text{Na}</math> + <math>\text{H}_2\text{O}</math><br/>                 3.3 MSD/MSD (Replaces) 8/1/1987<br/>                 3.4 DOT ID No.: 1857<br/>                 3.5 CAS Registry No.: 2163-80-6</p> | <p><b>4. OBSERVABLE CHARACTERISTICS</b><br/>                 4.1 Physical State: see description<br/>                 Solid or water solution<br/>                 4.2 Color: Colorless, granules may contain red or green dye<br/>                 4.3 Odor: None</p> |
|--|--|

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|--|
| <p><b>5. HEALTH HAZARDS</b></p> <p>5.1 Personal Protective Equipment: Protective clothing to prevent contact with dust, chemical goggles</p> <p>5.2 Symptoms Following Exposure: Severe poisoning by arsenite occurs early, burning in throat and stomach, and flushing pain. Acute toxicity followed by headache, vomiting, diarrhea, convulsions. About 1 cubic cm 1 cubic cm must be taken to cause these symptoms.</p> <p>5.3 Treatment of Exposure: INGESTION: induce vomiting, give water and restrict give a saline cathartic such as sodium sulfate. SKIN: wash with soap and water. EYES: wash with water, consult physician if irritation occurs.</p> <p>5.4 Threshold Limit Value: Data not available</p> <p>5.5 Short Term Exposure Limit: Not determined</p> <p>5.6 Toxicity by Ingestion: Grade 2, LD<sub>50</sub> = 0.56 g/kg (rat)</p> <p>5.7 Lethal Toxicity: Data not available</p> <p>5.8 Vapor (Gas) System Characteristics: None</p> <p>5.9 Liquid or Solid System Characteristics: Repeated contact may cause skin irritation</p> <p>5.10 Clear Threshold: Not determined</p> <p>5.11 IDLH Value: Data not available</p> |
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|   |
|---|
| <p><b>6. FIRE HAZARDS</b></p> <p>6.1 Flash Point: Not determined</p> <p>6.2 Flammable Limits in Air: Not determined</p> <p>6.3 Fire Extinguishing Agents: Not determined</p> <p>6.4 Fire Extinguishing Agents that do not meet fire criteria</p> <p>6.5 Special Hazards of Combustion<br/>                 Products: Toxic gases may be generated in fire.</p> <p>6.6 Behavior in Fire: Not determined</p> <p>6.7 Ignition Temperature: Not determined</p> <p>6.8 Chemical Stability: Not determined</p> <p>6.9 Burning Rate: Not determined</p> <p>6.10 Autoxidation Potential: Data not available</p> <p>6.11 Decomposition Air to Fuel Ratio: Data not available</p> <p>6.12 Flash Temperature: Data not available</p> |
|---|

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| <p><b>11. HAZARD ASSESSMENT CODE</b><br/>                 (See Hazard Assessment Handbook)<br/>                 85</p> |
|--|

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|---|
| <p><b>11. HAZARD CLASSIFICATIONS</b></p> <p>11.1 Code of Federal Regulations: Poison, B</p> <p>11.2 MSD Hazard Rating for Bulk Material Transportation: Not listed</p> <p>11.3 OSHA Hazard Classification: Not listed</p> |
|---|

|   |
|---|
| <p><b>7. CHEMICAL REACTIVITY</b></p> <p>7.1 Reactivity with Water: None</p> <p>7.2 Reactivity with Common Oxidants: None</p> <p>7.3 Stability During Transport: Stable</p> <p>7.4 Incompatibility Agents for Aqueous and Gaseous: Not determined</p> <p>7.5 Polymerization: Not determined</p> <p>7.6 Inhibitor of Polymerization: Not determined</p> <p>7.7 Heat of Polymerization: Data not available</p> <p>7.8 Reactivity Group: Data not available</p> |
|---|

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|---|
| <p><b>12. PHYSICAL AND CHEMICAL PROPERTIES</b></p> <p>12.1 Physical State at 20°C and 1 atm: Solid or water solution</p> <p>12.2 Molecular Weight: 186 (MSMA); 232 (DSMA)</p> <p>12.3 Boiling Point at 1 atm: Not determined</p> <p>12.4 Freezing Point: (MSMA) 24°C<br/>                 (DSMA) 137°F = 58°C = 32°C</p> <p>12.5 Critical Temperature: Not determined</p> <p>12.6 Critical Pressure: Not determined</p> <p>12.7 Specific Gravity: (MSMA) 1.6 at 20°C (solid)<br/>                 (MSMA) density 1.6-1.8 at 20°C (solid)</p> <p>12.8 Liquid Surface Tension: Not determined</p> <p>12.9 Liquid Water Insolubility: Not determined</p> <p>12.10 Vapor (Gas) Solubility: Not determined</p> <p>12.11 Rate of Specific Heat of Vaporization: Not determined</p> <p>12.12 Latent Heat of Vaporization: Not determined</p> <p>12.13 Heat of Combustion: Not determined</p> <p>12.14 Heat of Decomposition: Not determined</p> <p>12.15 Heat of Solution: Not determined</p> <p>12.16 Heat of Polymerization: Not determined</p> <p>12.17 Heat of Fusion: Data not available</p> <p>12.18 Limiting Viscosity: Data not available</p> <p>12.19 Reid Vapor Pressure: Data not available</p> |
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| <p><b>8. WATER POLLUTION</b></p> <p>8.1 Aquatic Toxicity: &gt; 1000 ppm/48 hr (fish)<br/>                 (MSMA)/LC<sub>50</sub>/fresh water</p> <p>8.2 Waterway Toxicity: Data not available</p> <p>8.3 Ecological Oxygen Demand (EOD): Data not available</p> <p>8.4 Fertilizer Chain Concentration Potential: Data not available</p> |
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| <p><b>9. SHIPPING INFORMATION</b></p> <p>9.1 Grade of Purity: The solid contains 99% (MSMA) contains water crystallization. Solids are often shipped as solutions in water with concentrations of 10 to about 50% water.</p> <p>9.2 Storage Temperature: Ambient</p> <p>9.3 DOT Atmospheric No. requirement</p> <p>9.4 Venting Class</p> |
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NOTES

# Material Safety Data Sheet

from Genium's Reference Collection  
Genium Publishing Corporation  
1145 Catalyn Street  
Schenectady, NY 12303-1836 USA  
(518) 377-8855



GENIUM PUBLISHING CORP.

No. 310  
METHYLENE CHLORIDE  
(Revision F)

Issued: September 1985  
Revised: November 1988

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## SECTION 1. MATERIAL IDENTIFICATION

Material Name: METHYLENE CHLORIDE

Description (Origin/Uses): Used widely in paint removers, as a solvent for plastics, as a degreasing agent, in propellant mixtures for aerosol sprays, and as a blowing agent in foams.

Other Designations: Dichloromethane; Freon 30<sup>®</sup>; Methane Dichloride; Methylene Dichloride; CH<sub>2</sub>Cl<sub>2</sub>; CAS No. 0075-09-2

Manufacturer: Contact your supplier or distributor. Consult the latest edition of the *Chemicalweek Buyers' Guide* (Genium ref. 73) for a list of suppliers.

|      |   |      |   |
|------|---|------|---|
| HMIS |   | NFPA |   |
| H    | 2 | R    | 1 |
| F    | 1 | I    | 3 |
| R    | 0 | S    | 3 |
| PPG* |   | K    | 1 |

\*See sect. 8



## SECTION 2. INGREDIENTS AND HAZARDS/EXPOSURE LIMITS

Methylene Chloride, ca 100%

### OSHA PEL

8-Hour TWA: 500 ppm

Ceiling: 1000 ppm Acceptable Maximum Peak above the Ceiling: 2000 ppm for 5 Minutes in Any 2-Hour Period

### ACGIH TLV, 1988-89

TLV-TWA: 50 ppm, 175 mg/m<sup>3</sup>  
(Adopted 1988-89)

### Toxicity Data\*

Rat, Oral, LD<sub>50</sub>: 2136 mg/kg  
Human, Inhalation, TC<sub>50</sub>: 500 ppm (8 Hours)

\*See NIOSH, RTECS (PA8050000), for additional data with references to irritative, reproductive, mutagenic, and tumorigenic effects.

## SECTION 3. PHYSICAL DATA

Boiling Point: 103.55°F (39.75°C) at 76 Torr

Melting Point: -142°F (-96.7°C)

Vapor Density (Air = 1): 2.9

Vapor Pressure: 440 Torr at 77°F (25°C)

Molecular Weight: 84.94 Grams/Mole

Solubility in Water (%): 1% by Weight

Specific Gravity (H<sub>2</sub>O = 1): 1.3255 at 68°F (20°C)

% Volatile by Volume: Ca 100

Appearance and Odor: A clear, colorless, volatile liquid; distinctive, penetrating, ethereal odor. The odor will not serve as a useful warning property because concentrations of 100 ppm are not easily perceptible. Most persons can detect this odor at above 300 ppm.

## SECTION 4. FIRE AND EXPLOSION DATA

Flash Point\*

Autoignition Temperature: 1033°F (556°C)

LEL: 12% w/v

UEL: 19% w/v

Extinguishing Media: \*Methylene chloride is not flammable under ordinary conditions. However, flammable vapor-air mixtures can form at approximately 212°F (100°C). Use water spray to cool fire-exposed containers and to flush spills away from exposures. Use extinguishing agents that will put out the surrounding fire. Unusual Fire or Explosion Hazards: Methylene chloride vapor is heavier than air and may collect and concentrate in low-lying, confined spaces. The high vapor pressure of methylene chloride means that when it is spilled, its vapor concentration in air can increase rapidly. If this vapor is heated, an explosion hazard is associated with the vapor-air mixture. Containers of this material may rupture violently if they are involved in fires. Special Fire-fighting Procedures: Wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in the pressure-demand or positive-pressure mode.

## SECTION 5. REACTIVITY DATA

Stability/Polymerization: Methylene chloride is stable in closed containers during routine operations. Hazardous polymerization cannot occur. Chemical Incompatibilities: Methylene chloride can react dangerously with nitrogen tetroxide, liquid oxygen, potassium, sodium, sodium-potassium alloys, lithium, potassium hydroxide with N-methyl-N-nitroso urea, potassium t-butoxide, and finely powdered aluminum and magnesium. Conditions to Avoid: Avoid all exposure to sources of ignition, heat, and incompatible chemicals. Prolonged exposure to water may cause hydrolysis to highly corrosive hydrochloric acid when the temperature is above 140°F (60°C). In oxygen-enriched atmospheres or when heated (>212°F [100°C]), methylene chloride vapor can be readily ignited. Hazardous Products of Decomposition: Exposure to high temperature (from open flame, hot surfaces, uninsulated steam lines, welding arcs, etc.) can produce toxic and corrosive thermal-oxidative products of decomposition such as hydrogen chloride, carbon monoxide, and even small quantities of phosgene gas, which is extremely poisonous.

## SECTION 6. HEALTH HAZARD INFORMATION

Carcinogenicity: Methylene chloride is listed as a suspected human carcinogen by the ACGIH (which classifies it as a group A2 carcinogen). Summary of Risks: Accidental contact of liquid methylene chloride with skin or eyes causes painful irritation and possible burns if not promptly removed. Exposure by way of contaminated gloves, clothing, or paint remover formulations can produce these same irritant effects. Long-term exposure to mild or moderate doses of methylene chloride may cause a delayed (24 to 48 hours) onset of dizziness, headache, mental confusion, slurred speech, double vision, and sleeplessness. Medical recovery can be slow. Overexposure to methylene chloride can cause elevated levels of carboxy hemoglobin in the blood (this same effect results from overexposure to carbon monoxide). Medical Conditions Aggravated by Long-Term Exposure: None reported. Target Organs: Skin, eyes, respiratory system, CNS, liver, kidneys, and blood. Primary Entry: Inhalation, skin contact/absorption. Acute Effects: Headache, giddiness, stupor, irritability, fatigue, tingling in the limbs, and narcosis that is not usually fatal if the exposure is terminated before anesthetic death occurs. Chronic Effects: The ACGIH classification of this material as a suspected human carcinogen implies that cancer is a possible effect of chronic exposure to methylene chloride. FIRST AID: Eyes. Immediately flush eyes, including under the eyelids, gently but thoroughly with

**SECTION 6. HEALTH HAZARD INFORMATION, cont.:**

flooding amounts of running water for at least 15 minutes. Skin. Rinse the affected area with flooding amounts of water and then wash it with soap and water. Inhalation. Remove the exposed person to fresh air; restore and/or support his or her breathing as needed. Have qualified medical personnel administer oxygen as required. Note to Attending Physician: Do not administer adrenalin. Ingestion. Unlikely. Should this type of exposure occur, do not induce vomiting because of the danger of aspiration. If spontaneous vomiting should occur, position the exposed person's head below his or her trunk to resist aspiration. Get medical help (in plant, paramedic, community) for all exposures. Seek prompt medical assistance for further treatment, observation, and support after first aid. Note to Physician: Absorbed methylene chloride is stored in body fat and metabolizes to carbon monoxide. This produced carbon monoxide increases and sustains carboxyhemoglobin levels in the blood, which concomitantly reduces the oxygen-carrying capacity of the blood. NIOSH advises preplacement and annual medical exams that emphasize liver, kidney, eye, skin, CNS, and respiratory system functions and a complete blood count. Simultaneous exposure to tobacco smoke, alcohol, and carbon monoxide, along with heavy manual labor, increases the body burden of a worker as well as the toxic hazards of the methylene chloride. In significant exposures, serum methylene chloride levels are of no clinical importance. Neurologic and hepatic status as well as carboxy hemoglobin should be monitored.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

**Spill/Leak:** Notify safety personnel, evacuate unnecessary personnel, eliminate all sources of ignition immediately, and provide adequate explosion-proof ventilation. Cleanup personnel need protection against this liquid's contact with the skin or eyes as well as inhalation of its vapor. Contain large spills and collect waste or absorb it with an inert material such as sand, earth, or vermiculite. Use nonsparking tools to place waste liquid or absorbent into closable containers for disposal. Keep waste out of sewers, watersheds, and waterways. **Waste Disposal:** Contact your supplier or a licensed contractor for detailed recommendations. Follow Federal, state, and local regulations.

**OSHA Designations**

Listed as an Air Contaminant (29 CFR 1910.1000 Subpart Z).

EPA Designations (40 CFR 302.4)

RCRA Hazardous Waste, NO. U080

CERCLA Hazardous Substance, Reportable Quantity: 1000 lbs (454 kg), per the Clean Water Act (CWA), § 307 (a), and the Resource Conservation and Recovery Act (RCRA), § 3001.

**SECTION 8. SPECIAL PROTECTION INFORMATION**

**Goggles:** Always wear protective eyeglasses or chemical safety goggles. Where splashing is possible, wear a full face shield. Follow OSHA eye- and face-protection regulations (29 CFR 1910.133). **Respirator:** Use a NIOSH-approved respirator per Genium reference 88 for the maximum-use concentrations and/or exposure limits cited in section 2. Follow OSHA respirator regulations (29 CFR 1910.134). For emergency or nonroutine operations (spills or cleaning reactor vessels and storage tanks), wear an SCBA. **Warning:** Air-purifying respirators will not protect workers in oxygen-deficient atmospheres. **Other:** Wear impervious neoprene, PVA, or Viton gloves, boots, aprons, and gauntlets, etc., to prevent any skin contact with liquid methylene chloride. **Ventilation:** Install and operate general and local maximum, explosion-proof ventilation systems powerful enough to maintain airborne levels of acetone below the exposure limits cited in section 2. Local exhaust ventilation is preferred because it prevents dispersion of the contaminant into the general work area by eliminating it at its source. Consult the latest edition of Genium reference 103 for detailed recommendations. **Floor or sump ventilation** may be necessary. **Safety Stations:** Make emergency eyewash stations, safety/quick-drench showers, and washing facilities available in work areas. **Contaminated Equipment:** Contact lenses pose a special hazard; soft lenses may absorb irritants, and all lenses concentrate them. Do not wear contact lenses in any work area. Remove contaminated clothing and launder it before wearing it again; clean this material from shoes and equipment. **Other:** Because the health effects of carbon monoxide and methylene chloride are additive (see sect. 6), workplaces should be equipped with automatic sensing equipment that identifies workroom atmospheric levels of both of these materials. **Comments:** Practice good personal hygiene; always wash thoroughly after using this material and before eating, drinking, smoking, using the toilet, or applying cosmetics. Keep it off your clothing and equipment. Avoid transferring it from your hands to your mouth while eating, drinking, or smoking. Do not eat, drink, or smoke in any work area. Do not inhale methylene chloride vapor.

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

**Storage/Segregation:** Store methylene chloride in closed, moisture-proof containers in a cool, dry, well-ventilated area away from sources of ignition, strong oxidizers, caustics, and incompatible chemicals (see sect. 5). Protect containers from physical damage.

**Special Handling/Storage:** Prevent moist air from entering storage containers. Provide ventilation at the floor level in storage areas because methylene chloride vapor is denser than air. Installation of a dryer and a safety seal on each tank is recommended. Aluminum is not recommended for use as a storage material; appropriate storage materials include galvanized iron, black iron, or steel.

**Controls:** Make sure all engineering systems (production, transportation) are of maximum explosion-proof design. Electrically ground and bond all containers and pipelines used in shipping, transferring, reacting, production, and sampling operations to prevent generating static sparks.

**Transportation Data (49 CFR 172.101-2)**

DOT Shipping Name: Dichloromethane or Methylene Chloride

DOT Hazard Class: ORM-A

ID No. UN1593

DOT Packaging Requirements: 49 CFR 173.605

DOT Packaging Exceptions: 49 CFR 173.505

IMO Shipping Name: Dichloromethane

IMO Hazard Class: 6.1

IMO Label: Saint Andrew's Cross (X)\*

IMDG Packaging Group: III

\*Harmful-Slow away from Foodstuffs.

References: 1, 26, 38, 84-94, 100, 116, 117, 120, 122.

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Prepared by PJ Igoe, BS

Industrial Hygiene Review: DJ Wilson, CIH

Medical Review: MJ Hardies, MD

# METHYL PARATHION

MPT

|   |   |
|---|---|
| <p><b>Common Synonyms</b></p> <p>Morton MPT<br/>Furon; Asten<br/>Asten; Furonol<br/>O,O-Dimethyl O-phenylthio<br/>phosphorothioate<br/>Phosphorothioate</p> | <p><b>Solid crystals</b> White solid or brown. Fumes white or gray.</p> <p><b>Solid and liquid form in water, solution breaks on water</b> (forming floating) down to 65°F.</p> |
|---|---|

**Avoid CONTACT with LIQUID** when possible and by skin (through clothing) but with well-ventilated breathing apparatus. Use protective if possible. Call for assistance! Wash and remove contaminated material. Notify local health and community control agencies.

**Fire**

**Combustible**  
**POISONOUS GASES ARE PRODUCED IN FIRE AND WHEN HEATED**  
Containers may explode in fire.  
Self-heating properties but not enhanced flaming characteristics. Avoid open flame, static electricity or electrical heater. (Instruct user not to) Do not exceed container with heat.

**Exposure**

\*ALL FOR MEDICAL USE\*

**LIQUID OR SOLID**  
**POISONOUS IF SWALLOWED OR IF SKIN IS EXPOSED.**  
Irritating to eyes.  
However, a dermatologist's finding that skin is not severely irritated with burns of order 1 or 2 in (1) 5, may occur when and with skin contact to water.  
1. SWALLOWED and vomit is LAVAGED. Also vomit with water or milk and have vomit checked for pH.  
2. SWALLOWED and vomit is LAVAGED. Also vomit with water or milk and have vomit checked for pH.  
3. SWALLOWED and vomit is LAVAGED. Also vomit with water or milk and have vomit checked for pH.

**Water Pollution**

HARMFUL TO AQUATIC LIFE IN VERY LOW CONCENTRATIONS. Difficult to biodegrade in fresh water systems. Notify local health and control agencies. Notify operators of nearby water supply.

|   |   |
|---|---|
| <p><b>1. RESPONSE TO DISCHARGE</b><br/>(See Response Methods Paragraph)</p> <p>Local water-pollution water contamination. Report to local health and control agencies. Chemical and physical treatment.</p> | <p><b>2. LABEL</b></p> <p>2.1 Category: Poison<br/>2.2 Class: 6</p> |
|---|---|

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| <p><b>3. CHEMICAL DESIGNATIONS</b></p> <p>3.1 CAS Compatibility Class: Not used<br/>3.2 Formula: <chem>CN(C)SCOP(=S)(C)C</chem><br/>3.3 Molecular Weight: 260.27<br/>3.4 DOT ID No.: 2783<br/>3.5 CAS Registry No.: 700-60-0</p> | <p><b>4. OBSERVABLE CHARACTERISTICS</b></p> <p>4.1 Physical State (see Synonyms): Solid. White, at ambient.<br/>4.2 Color: Colorless solid or brownish liquid.<br/>4.3 Odor: Characteristic, like rotten eggs or garlic.</p> |
|--|--|

**5. HEALTH HAZARDS**

5.1 Personal Protective Equipment: Approved mask or respirator, rubber rubber gloves, overalls, protective covering goggles.

5.2 Symptoms Following Exposure: Exposure to fumes from a fire, or to the liquid, causes respiratory, burned skin, irritation of the eyes, nose, throat, mouth, and skin. Symptoms may develop over a period of 8 hrs.

5.3 Treatment of Exposure: Seek a specialist. **INGESTION:** Call a doctor if vomit is not bringing excessively viscous or heavy material by mouth-to-mouth, mouth-to-nose, or mouth-to-ventricle method, when vomit is abundant, give milk, water, or salt-water and avoid washing repeatedly. **SKIN OR EYES:** Wash and wash exposed areas thoroughly with water. Remove contaminated clothing under a shower.

5.4 Threshold Limit Value: 0.2 mg/m<sup>3</sup>

5.5 Short Term Exposure Limit: Data not available

5.6 Toxicity by Ingestion: Class 6. LD<sub>50</sub> (rat) 50 mg/kg (bw)

5.7 Lethal Toxicity: Data not available

5.8 Vapor (Gas) irritant Characteristics: Not pertinent

5.9 Liquid or Solid irritant Characteristics: Penetrates when absorbed through skin

5.10 Skin Threshold: Data not available

5.11 IDLH Value: Data not available

**6. FIRE HAZARDS**

6.1 Flash Point: 106°F O.C.  
6.2 Flammable Limits in Air: Data not available  
6.3 Fire Extinguishing Agents: Water  
6.4 Fire Extinguishing Agents Not to be Used: Not pertinent  
6.5 Special Hazards of Combustion: Products: Toxic gases are produced in fire.  
6.6 Behavior in Fire: Drums may rupture violently  
6.7 Ignition Temperature: Data not available  
6.8 Self-Heating Characteristics: Not pertinent  
6.9 Boiling Point: Data not available  
6.10 Autoxidation Potential: Data not available  
6.11 Decomposition: Air in Fuel Ratio: Data not available  
6.12 Pour Point: Data not available

**7. CHEMICAL REACTIVITY**

7.1 Reactivity with Water: Not decomposed in 8 days at 65°C  
7.2 Reactivity with Common Materials: No reaction with acid, alk., which must be applied in extreme excess amount.  
7.3 Stability During Transport: Stable above 50°C with positive exposure time.  
7.4 Incompatibility Agents for Aqueous and Chemical: Apply inhibitor or other skin care with yellow stain inhibitor.  
7.5 Polymerization: Not pertinent  
7.6 Inhibitor of Polymerization: Not pertinent  
7.7 Other Data: Reaction to Products: Data not available  
7.8 Reactivity Group: Data not available

**8. WATER POLLUTION**

8.1 Aquatic Toxicity:  
1.0 ppm/96 hr (fish)/TL<sub>50</sub>/fresh water  
0.5 ppm/96 hr (fish)/TL<sub>50</sub>/fresh water  
8.2 Water Solubility: LD<sub>50</sub> = 10 mg/kg  
8.3 Biodegradation: Biodegradable (BOD)  
Data not available  
8.4 Food Chain Concentration Potential: Data not available

**9. SHIPPING INFORMATION**

9.1 Grades of Purity: Pure (solid, technical) Grade: 95% in water  
9.2 Storage Temperature: Below 50°F  
9.3 DOT Classification: No requirement  
9.4 Working Pressure: Not pertinent

**10. HAZARD ASSESSMENT CODE**  
(See Hazard Assessment Paragraph)  
A-2-V

**11. HAZARD CLASSIFICATIONS**

11.1 Grade of Federal Registration: Poison, 6  
11.2 GHS Hazard Rating for GHS Water Transportation: Not used  
11.3 NFPA Hazard Classification:  
Category: Corrosive  
Health Hazard (Skin) ..... 4 4  
Flammability (Solid) ..... 2 1  
Reactivity (Liquid) ..... 2 2

\*For return to sender, please see label

**12. PHYSICAL AND CHEMICAL PROPERTIES**

12.1 Physical State at 15°C and 1 atm: Solid  
12.2 Molecular Weight: 260.2  
12.3 Boiling Point at 1 atm: Very high  
12.4 Freezing Point: 65°F = 15°C = 59°F  
12.5 Critical Temperature: Not available  
12.6 Critical Pressure: Not available  
12.7 Specific Gravity: 1.380 at 20°C (solid)  
12.8 Liquid Surface Tension: Data not available  
12.9 Liquid Water Insolubility: Not available  
12.10 Vapor (Gas) Specific Gravity: Not pertinent  
12.11 Rate of Specific Heat of Vapor (Gas): Not pertinent  
12.12 Latent Heat of Vaporization: Not pertinent  
12.13 Heat of Combustion: Data not available  
12.14 Heat of Decomposition: Not pertinent  
12.15 Heat of Solution: Not pertinent  
12.16 Heat of Polymerization: Not pertinent  
12.17 Heat of Fusion: Data not available  
12.18 Limiting Value: Data not available  
12.19 Vapor Pressure: Data not available

NOTES

# Material Safety Data Sheet

From Genium's Reference Collection  
 Genium Publishing Corporation  
 1145 Catalyn Street  
 Schenectady, NY 12303-1836 USA  
 (518) 377-8855



GENIUM PUBLISHING CORP.

No. 7

**NITRIC ACID**  
 (Revision C)  
 Issued: October 1980  
 Revised: August 1988

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## SECTION 1. MATERIAL IDENTIFICATION

**Material Name:** NITRIC ACID

**Description (Origin/Uses):** Used to dissolve noble metals, for etching and cleaning metals, to make organic nitrates and nitrocompounds, to destroy residues of organic matter, and in explosives.

**Other Designations:** Red Fuming Nitric Acid; HNO<sub>3</sub>; CAS No. 7697-37-2

**Manufacturer:** Contact your supplier or distributor. Consult the latest edition of the *Chemicalweek Buyers' Guide* (Genium ref. 73) for a list of suppliers.



NFPA

|              |     |
|--------------|-----|
| HMIS         |     |
| H 3          | R 1 |
| F 0          | I 4 |
| R 1          | S 4 |
| PPG*         | K 0 |
| *See sect. 8 |     |

## SECTION 2. INGREDIENTS AND HAZARDS

Nitric Acid, CAS No. 7697-37-2

\*Contact your supplier to determine the percent by weight of nitric acid in the purchased product. Water is the other component of the product.  
 \*\*See NIOSH, RTECS (QU5775000, QU5900000), for additional data with references to reproductive effects.

## EXPOSURE LIMITS

OSHA PEL  
 8-Hr TWA: 2 ppm, 5 mg/m<sup>3</sup>

ACGIH TLVs, 1987-88  
 TLV-TWA: 2 ppm, 5 mg/m<sup>3</sup>  
 TLV-STEL: 4 ppm, 10 mg/m<sup>3</sup>

Toxicity Data\*\*  
 Mouse, Inhalation, LC<sub>50</sub>: 67 ppm/4 Hrs

## SECTION 3. PHYSICAL DATA

**Boiling Point:** Ca 251°F (122°C)\*  
**Specific Gravity (H<sub>2</sub>O = 1):** 1.4\*  
**pH:** Very Acidic

**Water Solubility (%):** Complete  
**Molecular Weight:** 63 Grams/Mole  
**Melting Point:** Ca -30°F (-34°C)\*

**Appearance and Odor:** A water white to slightly yellow liquid that darkens to a brownish color on aging and exposure to light; characteristic nitrogen dioxide (NO<sub>2</sub>) odor.

\*These properties are for the approximately 68%-by-weight nitric acid that is commercially available.

## SECTION 4. FIRE AND EXPLOSION DATA

LOWER UPPER

Flash Point and Method

Autoignition Temperature

Flammability Limits in Air  
 % by Volume

**Extinguishing Media:** \*Nitric acid does not burn. Use extinguishing agents that will put out the surrounding fire. Use a water spray to dilute nitric acid during fires and to absorb liberated oxides of nitrogen.

**Unusual Fire or Explosion Hazards:** Although nitric acid does not burn, it is a strong oxidizing agent that can react with combustible materials to cause fires. Also, it can react with metals to liberate extremely flammable hydrogen gas. If this happens, direct fire-fighting procedures at this evolved hydrogen gas.

**Special Fire-fighting Procedures:** Wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in the pressure-demand or positive-pressure mode. Choose protective equipment carefully (see sect. 5, Conditions to Avoid).

## SECTION 5. REACTIVITY DATA

Nitric acid is stable in closed containers at room temperature under normal storage and handling conditions. It cannot undergo hazardous polymerization.

**Chemical Incompatibilities:** Nitric acid reacts explosively with metallic powders, carbides, hydrogen sulfide, and turpentine. Contact with organic materials such as wood, paper, sawdust, or alcohol, etc., may cause fires. Combustible materials can sustain an increased flammability after being exposed to nitric acid even if they do not immediately catch fire.

**Conditions to Avoid:** Avoid any contact with incompatible chemicals. Because it is so reactive, always establish another material's compatibility with nitric acid before mixing the two materials. This applies to the selection of safety and handling equipment, because nitric acid can attack some forms of coatings, plastics, and rubber.

**Hazardous Products of Decomposition:** Various nitrogen oxides, including nitric oxide (NO), nitrogen dioxide (NO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), as well as nitric acid mist or vapor, can be produced by the decomposition reactions that can affect the nitric acid during fires.

**SECTION 6. HEALTH HAZARD INFORMATION**

Nitric acid is not listed as a carcinogen by the NTP, IARC, or OSHA.

**Summary of Risks:** This material is corrosive to any body tissue it contacts. Dental erosion is also reported.

**Medical Conditions Aggravated by Long-Term Exposure:** None reported. **Target Organs:** Skin, eyes, mucous membranes of the respiratory tract, teeth. **Primary Entry:** Inhalation, skin contact. **Acute Effects:** Irritation and/or corrosive burns of skin, eyes, and upper respiratory tract (URT), delayed pulmonary edema, pneumonitis, bronchitis, and dental erosion. **Chronic Effects:** None reported.

**FIRST AID:** **Eyes.** Immediately flush eyes, including under the eyelids, gently but thoroughly with plenty of running water for at least 15 minutes. Treat for eye burns. **Skin.** Immediately wash the affected area with soap and water. Watch for chemical skin burns and treat them accordingly. **Inhalation.** Remove the exposed person to fresh air; restore and/or support his or her breathing as needed. If the exposure is severe, hospitalization with careful monitoring by trained medical personnel to detect the delayed onset of severe pulmonary edema (lungs filled with fluid) is recommended for at least 72 hours. **Ingestion.** Call a poison control center. Never give anything by mouth to someone who is unconscious or convulsing. Do not induce vomiting. If the exposed person is responsive, give him or her one or two glasses of milk or water to drink as quickly as possible after exposure.

**GET MEDICAL HELP (IN PLANT, PARAMEDIC, COMMUNITY) FOR ALL EXPOSURES.** Seek prompt medical assistance for further treatment, observation, and support after first aid. **NOTE TO PHYSICIAN:** Wash affected skin areas with a 5% solution of sodium bicarbonate (NaHCO<sub>3</sub>). If ingested, the risk versus the benefit of the passage of a naso-gastric tube is debatable. Activated charcoal is of no value. Do not give the exposed person bicarbonate to neutralize the material.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

**Spill/Leak:** Notify safety personnel, provide ventilation, and eliminate all sources of ignition immediately in case contact with metals should produce highly flammable hydrogen gas. Cleanup personnel need protection against contact with and inhalation of nitric acid (see sect. 8). Contain large spills and collect waste. Use water sprays to direct nitric acid away from incompatible chemicals (see sect. 5). Neutralize the spilled nitric acid with soda ash or sodium bicarbonate. Use an absorbent such as sand, earth, or vermiculite on the resulting slurry and place the neutralized nitric acid material into containers suitable for eventual disposal, reclamation, or destruction.

**Waste Disposal:** Consider reclamation, recycling, or destruction rather than disposal in a landfill. Contact your supplier or a licensed contractor for detailed recommendations. Follow Federal, state, and local regulations.

**OSHA Designations**

Air Contaminant (29 CFR 1910.1000 Subpart Z)

EPA Designations (40 CFR 302.4)

CERCLA Hazardous Substance, Reportable Quantity: 1000 lbs (454 kg), per Clean Water Act (CWA), Section 311 (b) (4)

**SECTION 8. SPECIAL PROTECTION INFORMATION**

**Goggles:** Always wear protective eyeglasses or chemical safety goggles. Where splashing of nitric acid solution is possible, wear a full face shield as a supplementary protective measure. Follow OSHA eye- and face-protection regulations (29 CFR 1910.133).

**Respirator:** Consult the *NIOSH Pocket Guide to Chemical Hazards* (Genium ref. 88) for general recommendations on proper respiratory procedures. Follow OSHA respirator regulations (29 CFR 1910.134). For emergency or nonroutine use (leaks or cleaning reactor vessels and storage tanks), wear an SCBA with a full facepiece operated in the pressure-demand or positive-pressure mode. **Warning:** Air-purifying respirators will not protect workers in oxygen-deficient atmospheres. **Other:** Wear impervious gloves, boots, aprons, gauntlets, etc., to prevent skin contact with nitric acid. Choose protective equipment carefully (see sect. 5, Conditions to Avoid).

**Ventilation:** Install and operate both general and local exhaust-ventilation systems powerful enough to maintain airborne concentrations of nitric acid below the OSHA PEL standard cited in section 2. Construct exhaust ducts and systems with material such as fiberglass, which resists attack by nitric acid. **Safety Stations:** Make emergency eyewash stations, washing facilities, and safety/quickdrench showers available in work areas. **Contaminated Equipment:** Contact lenses pose a special hazard; soft lenses may absorb irritants and all lenses concentrate them. Do not wear contact lenses in any work area. Remove contaminated clothing and launder it before wearing it again; clean nitric acid from shoes and equipment. **Comments:** Practice good personal hygiene; always wash thoroughly after using this material. Keep it off of your clothing and equipment. Avoid transferring it from your hands to your mouth while eating, drinking, or smoking. Do not eat, drink, or smoke in any work area. Provide preplacement and annual medical exams with emphasis on skin irritation to workers who are regularly exposed to nitric acid. Workers must receive training before handling this material in the workplace; even experienced workers should undergo refresher training periodically.

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

**Storage/Segregation:** Store nitric acid in a cool, dry, well-ventilated area away from incompatible chemicals (see sect. 5). Consider outside, isolated, or detached storage. Protect containers from direct sunlight.

**Special Handling/Storage:** Build all storage facilities of nonflammable materials that are resistant to chemical attack by nitric acid. Protect containers from physical damage. Preplan for routine use and emergency response.

**Engineering Controls:** Proper ventilation is essential in bulk storage areas; consider installing an automatic monitoring system to detect hazardous levels of nitrogen oxides that can develop from this material.

**Comments:** Separate nitric acid from hydrazine, diethylenetriamine, fluorides, and all other corrosives except sulfuric acid and sulfur trioxide when shipping or transferring it.

**Transportation Data** (49 CFR 172.101-2)

**DOT Shipping Name:** (I) Nitric Acid, Fuming or (II) Nitric Acid, Over 40% or (III) Nitric Acid, 40% or Less

**DOT Label:** (I) Oxidizer and Poison or (II) Oxidizer and Corrosive or (III) Corrosive

**DOT Hazard Class:** (I) and (II) Oxidizer or (III) Corrosive Material

**DOT ID Nos.** (I) UN2032; (II) UN2031; (III) NA1760

**IMO Class:** 8 (All Types of Nitric Acid)

**IMO Label:** (I) Corrosive, Oxidizer, Poison; or (II) and (III) Corrosive

**References:** 1, 2, 26, 38, 84-94, 100, 112, 113, 114.

Judgments as to the suitability of information herein for purchaser's purposes are necessarily purchaser's responsibility. Therefore, although reasonable care has been taken in the preparation of such information, Genium Publishing Corp. extends no warranties, makes no representations and assumes no responsibility as to the accuracy or suitability of such information for application to purchaser's intended purposes or for consequences of its use.

Prepared by PJ Igoe, BS

Industrial Hygiene Review: DJ Wilson, CIH

Medical Review: MJ Hardies, MD

# NITROGEN TETROXIDE

NOX

|  |   |  |
|--|---|--|
| <p><b>Common Synonyms</b><br/>Nitrogen dioxide<br/>Nitrogen dioxide<br/>Red fumes of nitrogen<br/>Dioxine of nitrogen<br/>Dioxigen tetroxide</p>   | <p><b>Liquid nitrogen</b> Red-brown gas<br/>Sharp, irritating odor</p> <p>Boils and reacts with water. Peroxides brown vapor is produced.</p>   |  |
| <p><b>AVOID CONTACT WITH LIQUID AND VAPOR</b> Skin causes injury. Wear goggles, self-contained breathing apparatus, and rubber overclothing including gloves.<br/>See emergency aid section.<br/>Exposure areas in case of large releases.<br/>Heavy local health and ecological control operations.</p>   |   |  |
| <p style="text-align: center;"><b>Fire</b></p>   | <p><b>See Synonyms.</b><br/>May decompose and explode on contact with oxidizables.<br/><b>POISONOUS GASES ARE PRODUCED IN FIRE AND WHEN HEATED.</b><br/>Wear goggles, self-contained breathing apparatus, and rubber overclothing including gloves.<br/>Place emergency area with water.<br/>Keep fire at gas or liquid.<br/>Cool exposed containers with water.</p>  |  |
| <p style="text-align: center;"><b>Exposure</b></p>   | <p><b>CALL FOR MEDICAL AID.</b><br/><b>VAPOR</b><br/><b>POISONOUS IF INHALED.</b><br/>Irritating to eyes.<br/>Move to fresh air.<br/>If breathing has stopped, give artificial respiration.<br/>If breathing is difficult, give oxygen.</p> <p><b>LIQUID</b><br/>Do not touch and avoid contact.<br/><b>POISONOUS IF SWALLOWED.</b><br/>Remove contaminated clothing and shoes.<br/>Flush affected areas with plenty of water.<br/>If in EYES, flush directly open and flush with plenty of water if SWALLOWED and victim is CONSCIOUS, have victim drink water or milk.<br/><b>DO NOT INDUCE VOMITING.</b></p> |  |
| <p style="text-align: center;"><b>Water Pollution</b></p>  | <p><b>HAZARDOUS TO AQUATIC LIFE IN VERY LOW CONCENTRATIONS.</b> May be dangerous if it enters water system.<br/>Heavy local health and wildlife effects.<br/>Acute mortality of nearby water animals.</p>   |  |
| <p style="text-align: center;"><b>1. RESPONSE TO DISCHARGE</b><br/>(See Response to Discharge Handbook)<br/>Isolate, demarcation, or containment, water contamination, corrosion, recover, remove, evaluate area</p>   | <p style="text-align: center;"><b>2. LABEL</b><br/>2.1 Category: Poison gas, Corrosive<br/>2.2 Class 2 and 6</p>  |  |
| <p style="text-align: center;"><b>3. CHEMICAL DESIGNATIONS</b></p> <p>3.1 OQ Compatibility Class: Not listed<br/>3.2 Formula: <math>N_2O_4</math><br/>3.3 MSD/AM Designation: 21/MS7<br/>3.4 DOT ID No.: 1817<br/>3.5 CAS Registry No.: 10102-43-0</p>   | <p style="text-align: center;"><b>4. OBSERVABLE CHARACTERISTICS</b></p> <p>4.1 Physical State (See Synonyms) Liquid<br/>4.2 Odor: Red-brown or orange-brown/iridescent, irritating, bitter, about 14°F<br/>4.3 Odor: Pungent, acrid, easily irritating</p>  |  |
| <p><b>5. HEALTH HAZARDS</b></p>  |   |  |
| <p>5.1 Personal Protective Equipment: Rubber gloves, safety goggles and face shield, protective clothing and gas-tight respirator or self-contained breathing apparatus.<br/>5.2 Occupational Exposure Limits: Very dangerous levels produce coughing, choking, headache, nausea, pain in throat and substernal area, low respiratory volume at time of exposure. After exposure-free period of 5-72 hours, pulmonary volume gradually decreases, causing fatigue, weakness, coughing, difficulty in breathing, early expiration, mental confusion, dizziness, bluish skin, and even, rapid pulse. Even NIOSH standards with gas exchange in lungs, irritation—red and rash by desiccation can result, usually within a few hours after onset of pulmonary edema.<br/>5.3 Treatment of Exposure: <b>INHALATION:</b> Remove patient to fresh air and have him breathe as deeply as possible for a while; otherwise transport him for 24-48 hours; have water, give oxygen if breathing stops; oxygen may address exposure (10 ppm) <b>EYES AND SKIN:</b> Flush with water for at least 15 min.<br/>5.4 Threshold Limit Value: 3 ppm<br/>5.5 Short Term Exposure Limit: 25 ppm for 5 min.<br/>5.6 Toxicity by Exposure: Data not available<br/>5.7 Late Toxicity: Data not available<br/>5.8 Vapor (Gas) irritates Characteristic: Vapor causes severe irritation of eyes and throat and can blind eye and lung injury. They cannot be removed even at low concentrations.<br/>5.9 Liquid or Solid irritates Characteristic: Same as vapor. Causes necrosis and epidermal burns on skin contact and is very corrosive to the skin.<br/>5.10 Oral Toxicity: 5 ppm<br/>5.11 IDLH Value: 50 ppm</p> |   |  |

| <p style="text-align: center;"><b>6. FIRE HAZARD</b></p> <p>6.1 Flash Point: Data not available<br/>6.2 Flammable Limits in Air: Not known<br/>6.3 Fire Extinguishing Agents: See list of gas<br/>6.4 Fire Extinguishing Agents that do not attack this product<br/>6.5 Special Hazards of Combustion: Products: Peroxides form gas when heated.<br/>6.6 Behavior in Fire: Does not burn, but causes combustion of combustible materials such as wood. May cause fire or explode on contact with other gases.<br/>6.7 Ignition Temperature: Data not available<br/>6.8 Self-Heating: Data not available<br/>6.9 Spontaneous Heat: Data not available<br/>6.10 Adiabatic Flame Temperature: Data not available<br/><i>(Continued)</i></p> | <p style="text-align: center;"><b>10. HAZARD ASSESSMENT CODE</b><br/>(See Hazard Assessment Handbook)<br/><b>A-1-1-0</b></p> <p style="text-align: center;"><b>11. HAZARD CLASSIFICATIONS</b></p> <p>11.1 Grade of Federal Regulation: <b>Poison A</b><br/>11.2 OAS Hazard Rating for Bulk Water Transportation</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Category</th> <th style="text-align: left;">Rating</th> </tr> </thead> <tbody> <tr> <td>Flammable</td> <td>0</td> </tr> <tr> <td>Health</td> <td>4</td> </tr> <tr> <td>Vapor Irritant</td> <td>4</td> </tr> <tr> <td>Liquid or Solid Irritant</td> <td>4</td> </tr> <tr> <td>Poison</td> <td>4</td> </tr> <tr> <td>Water Pollution</td> <td>3</td> </tr> <tr> <td>Human Toxicity</td> <td>3</td> </tr> <tr> <td>Aquatic Toxicity</td> <td>3</td> </tr> <tr> <td>Acute Toxicity</td> <td>4</td> </tr> <tr> <td>Reactivity</td> <td>2</td> </tr> <tr> <td>Clear Channel</td> <td>2</td> </tr> <tr> <td>WRE</td> <td>0</td> </tr> <tr> <td>Self Reaction</td> <td>0</td> </tr> </tbody> </table> <p>11.3 NFPA Hazard Classification</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Category</th> <th style="text-align: left;">Classification</th> </tr> </thead> <tbody> <tr> <td>Health Hazard (GHS)</td> <td>3</td> </tr> <tr> <td>Poisonous (GHS)</td> <td>0</td> </tr> <tr> <td>Reactivity (GHS)</td> <td>0</td> </tr> </tbody> </table> | Category | Rating | Flammable | 0 | Health | 4 | Vapor Irritant | 4 | Liquid or Solid Irritant | 4 | Poison | 4 | Water Pollution | 3 | Human Toxicity | 3 | Aquatic Toxicity | 3 | Acute Toxicity | 4 | Reactivity | 2 | Clear Channel | 2 | WRE | 0 | Self Reaction | 0 | Category | Classification | Health Hazard (GHS) | 3 | Poisonous (GHS) | 0 | Reactivity (GHS) | 0 |
|--|---|----------|--------|-----------|---|--------|---|----------------|---|--------------------------|---|--------|---|-----------------|---|----------------|---|------------------|---|----------------|---|------------|---|---------------|---|-----|---|---------------|---|----------|----------------|---------------------|---|-----------------|---|------------------|---|
| Category   | Rating  |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Flammable  | 0   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Health   | 4   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Vapor Irritant   | 4   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Liquid or Solid Irritant   | 4   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Poison   | 4   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Water Pollution  | 3   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Human Toxicity   | 3   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Aquatic Toxicity   | 3   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Acute Toxicity   | 4   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Reactivity   | 2   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Clear Channel  | 2   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| WRE  | 0   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Self Reaction  | 0   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Category   | Classification  |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Health Hazard (GHS)  | 3   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Poisonous (GHS)  | 0   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| Reactivity (GHS)   | 0   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| <p style="text-align: center;"><b>7. CHEMICAL REACTIVITY</b></p> <p>7.1 Reactivity With Water: Corrosive to iron wire and steel wire mesh. More solid reacts with it to form more nitrogen oxides.<br/>7.2 Reactivity With Common Materials: Very corrosive to metals such as steel. Reacts vigorously with combustible materials such as wood.<br/>7.3 Stability During Transport: Stable<br/>7.4 Instability Agents for Decomposition: Flash with water, then can form acid or base.<br/>7.5 Polymerization: Not pertinent<br/>7.6 Inhibitor of Polymerization: Not pertinent<br/>7.7 Oxidizing: Reacts to products: Data not available<br/>7.8 Reactivity Group: Data not available</p>   | <p style="text-align: center;"><b>12. PHYSICAL AND CHEMICAL PROPERTIES</b></p> <p>12.1 Physical State at 50°C and 1 atm: <b>Solid</b><br/>12.2 Molecular Weight: <b>92.02</b><br/>12.3 Boiling Point at 1 atm: <b>21.17° - 21.2°C = 69.9°F</b><br/>12.4 Freezing Point: <b>11.27° - 11.2°C = 52.3°F</b><br/>12.5 Critical Temperature: <b>317.67° = 165.2°C = 329.4°F</b><br/>12.6 Critical Pressure: <b>1470 atm = 149 atm = 10.1 MPa</b><br/>12.7 Specific Gravity: <b>1.65 at 20°C (liq)</b><br/>12.8 Liquid Surface Tension: Not pertinent<br/>12.9 Liquid Water Vaporization: Not pertinent<br/>12.10 Vapor (Gas) Specific Gravity: <b>2.1</b><br/>12.11 Ratio of Specific Heats of Vapor (GAS): <b>1.29</b><br/>12.12 Latent Heat of Vaporization: <b>170 Btu/lb = 80.1 cal/g = 4.16 x 10<sup>4</sup> J/kg</b><br/>12.13 Heat of Combustion: Not pertinent<br/>12.14 Heat of Decomposition: Not pertinent<br/>12.15 Heat of Solution: Data not available<br/>12.16 Heat of Polymerization: Not pertinent<br/>12.17 Heat of Fusion: <b>68.2 cal/g</b><br/>12.18 Latent Heat: Data not available<br/>12.19 Heat Vapor Pressure: <b>20 mm</b></p>  |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| <p style="text-align: center;"><b>8. WATER POLLUTION</b></p> <p>8.1 Aquatic Toxicity: <b>72 ppm/96 hr (acute) 200 ppm/96 hr (chronic) 200 ppm/96 hr (sublethal)</b><br/>8.2 Waterway Toxicity: Data not available<br/>8.3 Biological Oxygen Demand (BOD): <b>None</b><br/>8.4 Food Chain Concentration Potential: <b>None</b></p>  | <p style="text-align: center;"><b>9. SHIPPING INFORMATION</b></p> <p>9.1 Grades of Purity: Data not available<br/>9.2 Storage Temperature: Ambient, Storage and transport containers must be equipped with pressure-relief ventilation systems.<br/>9.3 Spill Anticipation: No treatment<br/>9.4 Venting Pressure: Relief valves on containers</p>  |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |
| <p><b>6. FIRE HAZARDS (Continued)</b></p> <p>6.11 Self-Heating: Air to Fuel Ratio: Data not available<br/>6.12 Flame Temperature: Data not available</p>   |   |          |        |           |   |        |   |                |   |                          |   |        |   |                 |   |                |   |                  |   |                |   |            |   |               |   |     |   |               |   |          |                |                     |   |                 |   |                  |   |

# Material Safety Data Sheet

From Genium's Reference Collection  
 Genium Publishing Corporation  
 1145 Catalyn Street  
 Schenectady, NY 12303-1836 USA  
 (518) 377-8855



No. 205

POTASSIUM NITRATE

Issued: January 1987

## SECTION 1. MATERIAL IDENTIFICATION

**MATERIAL NAME:** POTASSIUM NITRATE

**DESCRIPTION/USES:** Used in pyrotechnics; explosives; matches; as a specialty fertilizer; reagent; to modify burning properties of tobacco; in glass manufacture; tempering steel; curing foods; as an oxidizer in solid rocket propellants.

**OTHER DESIGNATIONS:** Nitric Acid, Potassium Salt; Niter; Saltpeter; KNO<sub>3</sub>; CAS #7757-79-1

**MANUFACTURER/SUPPLIER:** Available from several suppliers, including: Aldrich Chemical Co., Inc., PO Box 355, Milwaukee, WI 53201; Telephone: (414) 273-3850



HMS Nonfire Fire  
 H 1  
 F 0 R 1  
 R 1 I -  
 PPE\* S 2  
 \*See Sect. 8 K 0

## SECTION 2. INGREDIENTS AND HAZARDS

Potassium Nitrate, CAS #7757-79-1

%

### HAZARD DATA

>99%

ACGIH TLV:  
None Established

OSHA PEL:  
None Established

Oral, Rat,  
LD<sub>50</sub>: 3750 mg/kg

Oral, Rabbit,  
LD<sub>50</sub>: 1901 mg/kg

## SECTION 3. PHYSICAL DATA

Melting Point ... 633°F (334°C)  
 Boiling Point ... 400°C (Decomposes)  
 Specific Gravity @ 16°C ... 2.11  
 Vapor Pressure @ 20°C ... Negligible  
 % Volatiles ... 0  
 Evaporation Rate ... Not Found

Solubility in Water, at 0°C ... 13.3 g/100 cc  
 at 100°C ... 247 g/100 cc  
 pH of 5% Solution, at 25°C ... 4.5-7.0  
 Molecular Weight ... 101.1

Appearance and odor: White crystalline powder or granules. No odor.

## SECTION 4. FIRE AND EXPLOSION DATA

| Flash Point and Method | Autoignition Temperature | Flammability Limits in Air | LOWER | UPPER |
|------------------------|--------------------------|----------------------------|-------|-------|
| Not Found              | Not Found                | Not Found                  | --    | --    |

Potassium nitrate is not combustible. However, it is a strong oxidizer and can initiate and intensify combustion of flammable materials.

**EXTINGUISHING AGENTS:** Flood fires involving this material with water. Keep fire-exposed containers cool with water spray. Remove containers from the fire area if it can be done safely.

**UNUSUAL FIRE/EXPLOSION HAZARDS:** At high temperatures this material can fuse or melt; application of water when large quantities are involved can result in extensive scattering of molten material.

**SPECIAL FIRE-FIGHTING PROCEDURES:** Toxic fumes/gases can be evolved in a fire situation. Fire fighters should use self-contained breathing apparatus and wear full protective gear.

## SECTION 5. REACTIVITY DATA

Potassium nitrate is stable at room temperature. It does not polymerize.

Violent reactions (including fire and explosion) may occur on its contact with organic materials, combustible materials, and reducing agents. Specific incompatibles under various conditions include aluminum, titanium, antimony, germanium, zinc, zirconium (and other metals), calcium disilicide, chromium nitride, metal sulfides, boron, carbon, sulfur, phosphorus, phosphides, sodium phosphinate, sodium thiosulfate, citric acid, tin chloride, sodium acetate, and thorium carbide.

Potassium nitrate decomposes at approximately 752°F (400°C) with the evolution of oxygen and oxides of nitrogen (toxic).

**SECTION 6. HEALTH HAZARD INFORMATION**

Potassium nitrate has not been identified as a known or suspected carcinogen by the NTP, IARC, or OSHA. This material can enter the body if it is inhaled or swallowed.

**EFFECTS OF OVEREXPOSURE:** Inhalation of excessive concentrations may be irritating to the nose, throat, and respiratory tract. Prolonged exposure may cause anemia, methemoglobinemia (the presence of methemoglobin, a soluble brown crystalline blood pigment that differs from hemoglobin in that it contains ferric iron and is unable to combine reversibly with molecular oxygen), and kidney injury (nephritis). Ingestion can cause severe gastrointestinal distress with abdominal pain, nausea, vomiting, and diarrhea. Eye contact may cause irritation.

**FIRST AID: EYE CONTACT:** Flush eyes, including under the eyelids, with a gentle flow of running water. Get medical help.\*  
**SKIN CONTACT:** Wash affected area with mild soap and water. If irritation persists, prevent further contact and get medical help.\*  
**INHALATION:** Remove victim from exposure. Get medical help if irritation or discomfort persists.\*  
**INGESTION:** Give victim a large quantity of water to drink. Induce vomiting and get prompt medical help.\*  
 Keep him warm and at rest.  
**NOTE:** Never give anything by mouth or induce vomiting if the victim is unconscious.

\* **GET MEDICAL ASSISTANCE** - In plant, community, paramedic. Get medical help for further treatment, observation, and support after first aid.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

Ventilate the potassium nitrate spill area. Prevent contact of spilled material with combustible and incompatible materials. Cleanup personnel should wear personal protective equipment as necessary to prevent skin/eye contact and dust inhalation. Carefully scoop spilled material into a suitable container for reclamation or disposal. Avoid generating dust during cleanup. Absorb small solution spills on inert (noncombustible) material such as dry sand or earth.  
**Disposal:** Potassium nitrate requires disposal as a hazardous waste. Reclaim material when possible. Contact your supplier or a licensed chemical waste disposal contractor for treatment and disposal instructions. Follow all applicable Federal, state, and local regulations.

Reportable Spill Quantity: Not listed in 40 CFR 117.3, "Reportable Quantities of Hazardous Substances."  
 EPA Hazardous Waste Number: D001 (Ignitable, 40 CFR 261.21)

**SECTION 8. SPECIAL PROTECTION INFORMATION**

Use local exhaust ventilation to control airborne levels where potassium nitrate dust, mist, or fumes are generated.

Use an appropriate NIOSH-approved respirator for protection against potassium nitrate dust/mist where airborne levels are excessive. Respirator usage must be in accordance with OSHA requirements (29 CFR 1910.134).

Wear protective clothing (aprons, coveralls, etc.) where the possibility of skin or clothing contamination exist. Wear rubber gloves and safety goggles when handling this material.

Eyewash stations and washing facilities should be readily accessible to workers handling this material.

Contact lenses pose a special hazard; soft lenses may absorb irritants and all lenses concentrate them. Particles may adhere to contact lenses and cause corneal damage.

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

Store potassium nitrate in closed containers in a cool, dry location on a noncombustible surface. Store it away from flammable and combustible materials, reducing agents, and other incompatible materials (see sect. 5). Protect containers from physical damage.

Practice good housekeeping. Clean up spills promptly. Use procedures and techniques that minimize dust generation. Practice good personal hygiene. Wash thoroughly after handling this material and before eating, drinking, and smoking. Do not eat, drink, or smoke in the work area. Remove contaminated clothing promptly. Launder it before wearing it again. Do not take this material out of your work area or to your home on your clothing or equipment.

DOT Hazard Classification: Oxidizer (49 CFR 172.101) DOT ID No. UN1486 DOT Label: Oxidizer

Data Source(s) Code: 4, 5, 6, 9, 25, 49, 58, 77, 82, CV

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Approvals *J. P. P. P. P.*

Indust. Hygiene/Safety *J. P. P. P. P. 4/87*

Medical Review *J. P. P. P. P. 8/7*



**SECTION 1. MATERIAL IDENTIFICATION**

20

**MATERIAL NAME:** TOLUENE

**OTHER DESIGNATIONS:** Methyl Benzene, Methyl Benzol, Phenylmethane, Toluol, C<sub>7</sub>H<sub>8</sub>, CAS #0108-88-3

**MANUFACTURER/SUPPLIER:** Available from many suppliers, including:  
 Allied Corp., PO Box 2064R, Morristown, NJ 07960; Telephone: (201) 455-4400  
 Ashland Chemical Co., Industrial Chemicals & Solvents Div., PO Box 2219,  
 Columbus, OH; Telephone: (614) 889-3844

**HMIS**

H: 2

F: 3

R: 0

PPE\*

\*See sect. 8



R 1  
 I 3  
 S 2  
 K 4

**SECTION 2. INGREDIENTS AND HAZARDS**

Toluene



ca 100 %

**HAZARD DATA**

8-hr TLV: 100 ppm, or  
 375 mg/m<sup>3</sup>\* (Skin)\*\*

Max. Inhalation, TCLo:  
 100 ppm: Psychotropic\*\*\*

Rat, Oral, LD<sub>50</sub>: 5000 mg/kg

Rat, Inhalation, LCLo:

4000 ppm/4 hrs.

Rabbit, Skin, LD<sub>50</sub>: 14 gm/kg

Human, Eye: 300 ppm

- \* Current (1985-86) ACGIH TLV. The OSHA PEL is 200 ppm with an acceptable ceiling concentration of 300 ppm and an acceptable maximum peak of 500 ppm/10 minutes.
- \*\* Skin designation indicates that toluene can be absorbed through intact skin and contribute to overall exposure.
- \*\*\* Affects the mind.

**SECTION 3. PHYSICAL DATA**

Boiling Point ... 231°F (111°C)

Vapor Pressure @ 20°C, mm Hg ... 22

Water Solubility @ 20°C, wt. % ... 0.05

Vapor Density (Air = 1) ... 3.14

Evaporation Rate (BuAc = 1) ... 2.24

Specific Gravity (H<sub>2</sub>O = 1) ... 0.866

Melting Point ... -139°F (-93°C)

Percent Volatile by Volume ... ca 100

Molecular Weight ... 92.15

**Appearance and odor:** Clear, colorless liquid with a characteristic aromatic odor. The odor is detectable to most individuals in the range of 10 to 15 ppm. Because olfactory fatigue occurs rapidly upon exposure to toluene, odor is not a good warning property.

**SECTION 4. FIRE AND EXPLOSION DATA**

| Flash Point and Method | Autoignition Temp. | Flammability Limits in Air | LOWER | UPPER |
|------------------------|--------------------|----------------------------|-------|-------|
|                        |                    |                            |       |       |
| 40°F (4°C) CC          | 896°F (480°C)      | % by Volume                | 1.27  | 7.1   |

**EXTINGUISHING MEDIA:** Carbon dioxide, dry chemical, alcohol foam. Do not use a solid stream of water because the stream will scatter and spread the fire. Use water spray to cool tanks/containers that are exposed to fire and to disperse vapors.

**UNUSUAL FIRE/EXPLOSION HAZARDS:** This OSHA class IB flammable liquid is a dangerous fire hazard. It is a moderate fire hazard when exposed to oxidizers, heat, sparks, or open flame. Vapors are heavier than air and may travel a considerable distance to an ignition source and flash back.

**SPECIAL FIRE-FIGHTING PROCEDURES:** Fire fighters should wear self-contained breathing apparatus with full facepiece operated in a positive-pressure mode when fighting fires involving toluene.

**SECTION 5. REACTIVITY DATA**

**CHEMICAL INCOMPATIBILITIES:** Toluene is stable in closed containers at room temperature under normal storage and handling conditions. It does not undergo hazardous polymerization. This material is incompatible with strong oxidizing agents, dinitrogen tetroxide, silver perchlorate, tetranitromethane, and uranium hexafluoride. Contact with these materials may cause fire or explosion. Nitric acid and toluene, especially in the presence of sulfuric acid, will produce nitrated compounds that are dangerously explosive.

**CONDITIONS TO AVOID:** Avoid exposure to sparks, open flame, hot surfaces, and all sources of heat and ignition. Toluene will attack some forms of plastics, rubber, and coatings. Thermal decomposition or burning produces carbon dioxide and/or carbon monoxide.

**SECTION 6. HEALTH HAZARD INFORMATION | TLV**

Toluene is not considered a carcinogen by the NTP, IARC, or OSHA. **SUMMARY OF RISKS:** Vapors of toluene may cause irritation of the eyes, nose, upper respiratory tract, and skin. Exposure to 200 ppm for 8 hours causes mild fatigue, weakness, confusion, lacrimation (tearing) and paresthesia (a sensation of prickling, tingling, or creeping on the skin that has no objective cause). Exposure to higher concentrations may cause headache, nausea, dizziness, dilated pupils, and euphoria, and, in severe cases, may cause unconsciousness and death. The liquid is irritating to the eyes and skin. Contact with the eyes may cause transient corneal damage, conjunctival irritation, and burns if not promptly removed. Repeated and/or prolonged contact with the skin may cause drying and cracking. It may be absorbed through the skin in toxic amounts. Ingestion causes irritation of the gastrointestinal tract and may cause effects resembling those from inhalation of the vapor. Chronic overexposure to toluene may cause reversible kidney and liver injury. **FIRST AID: EYE CONTACT:** Immediately flush eyes, including under eyelids, with running water for at least 15 minutes. Get medical attention if irritation persists. \* **SKIN CONTACT:** Immediately flush skin (for at least 15 minutes) while removing contaminated shoes and clothing. Wash exposed area with soap and water. Get medical attention if irritation persists or if a large area has been exposed. \* **INHALATION:** Remove victim to fresh air. Restore and/or support breathing as required. Keep victim warm and quiet. Get medical help. \* **INGESTION:** Give victim 1 to 2 glasses of water or milk. Contact a poison control center. Do not induce vomiting unless directed to do so. Transport victim to a medical facility. Never give anything by mouth to a person who is unconscious or convulsing. \* **GET MEDICAL ASSISTANCE** - In plant, paramedic, community. Get medical help for further treatment, observation, and support after first aid, if indicated.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

**SPILL/LEAK:** Notify safety personnel of large spills or leaks. Remove all sources of heat and ignition. Provide maximum explosion-proof ventilation. Limit access to spill area to necessary personnel only. Remove leaking containers to safe place if feasible. Cleanup personnel need protection against contact with liquid and inhalation of vapor (see sect. 8). **WASTE DISPOSAL:** Absorb small spills with paper towel or vermiculite. Contain large spills and collect if feasible, or absorb with vermiculite or sand. Place waste solvent or absorbent into closed containers for disposal using nonsparking tools. Liquid can be flushed with water to an open holding area for handling. Do not flush to sewer, watershed, or waterway. **COMMENTS:** Place in suitable container for disposal by a licensed contractor or burn in an approved incinerator. Consider reclaiming by distillation. Contaminated absorbent can be buried in a sanitary landfill. Follow all Federal, state, and local regulations. TLm 96: 100-10 ppm. Toluene is designated as a hazardous waste by the EPA. The EPA (RCRA) HW No. is U220 (40 CFR 261). The reportable quantity (RQ) is 1000 lbs/454 kg (40 CFR 117).

**SECTION 8. SPECIAL PROTECTION INFORMATION**

Provide general and local exhaust ventilation to meet TLV requirements. Ventilation fans and other electrical service must be nonsparking and have an explosion-proof design. Exhaust hoods should have a face velocity of at least 100 fpm (linear feet per minute) and be designed to capture heavy vapor. For emergency or nonroutine exposures where the TLV may be exceeded, use an organic chemical cartridge respirator if concentration is less than 200 ppm and an approved canister gas mask or self-contained breathing apparatus with full facepiece if concentration is greater than 200 ppm. Safety glasses or splash goggles should be worn in all work areas. Neoprene gloves, apron, face shield, boots, and other appropriate protective clothing and equipment should be available and worn as necessary to prevent skin and eye contact. Remove contaminated clothing immediately and do not wear it until it has been properly laundered.

Eyewash stations and safety showers should be readily available in use and handling areas.

Contact lenses pose a special hazard; soft lenses may absorb irritants and all lenses concentrate them.

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

**STORAGE SEGREGATION:** Store in a cool, dry, well-ventilated area away from oxidizing agents, heat, sparks, or open flame. Storage areas must meet OSHA requirements for class IB flammable liquids. Use metal safety cans for handling small amounts. Protect containers from physical damage. Use only with adequate ventilation. Avoid contact with eyes, skin, or clothing. Do not inhale or ingest. Use caution when handling this compound because it can be absorbed through intact skin in toxic amounts. **SPECIAL HANDLING/STORAGE:** Ground and bond metal containers and equipment to prevent static sparks when making transfers. Do not smoke in use or storage areas. Use nonsparking tools. **ENGINEERING CONTROLS:** Preplacement and periodic medical exams emphasizing the liver, kidneys, nervous system, lungs, heart, and blood should be provided. Workers exposed to concentrations greater than the action level (50 ppm) should be examined at least once a year. Use of alcohol can aggravate the toxic effects of toluene.

**COMMENTS:** Emptied containers contain product residues. Handle accordingly!

Toluene is designated as a hazardous substance by the EPA (40 CFR 116). DOT Classification: Flammable liquid. UN1294.

Data Source(s) Code: 1-9, 12, 16, 20, 21, 24, 26, 34, 81, 82. CR

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Approvals *JO. Rucisco, 11/86.*

Indust. Hygiene/Safety *JW 10-86*

Medical Review *[Signature]*

# TOXAPHENE

TXP

|  |   |
|--|---|
| <p><b>Common Synonyms</b><br/>Chlorobiphenyls</p>  | <p>White solid or in solution</p> <p>Soluble in water, insoluble in oil.</p>  |
| <p>Keep container &amp; package. Keep package dry.<br/>Call fire department<br/>Wear gloves with acid and caustic.<br/>Wash and remove decontaminated material.<br/>Notify local health and pollution control agencies.</p>  |   |
| <p><b>Fire</b></p>   | <p>Solid not flammable, but strongly decomposes in decomposition heat.</p> <p><b>POISONOUS GASES ARE PRODUCED IN FIRE.</b><br/>Major products of fire are HYDROGEN CYANIDE, and other unidentifiable products.</p> <p>Extinguish with foam, dry chemical or carbon dioxide.<br/>Water may be ineffective on fire.<br/>Call chemical companies with name.</p>  |
| <p><b>C</b></p>  |   |
| <p><b>Exposure</b></p>   | <p>CALL FOR MEDICAL AID.</p> <p><b>SOLID OR SOLUTION</b><br/><b>POISONOUS IF SWALLOWED.</b><br/>POISONOUS TO SKIN AND EYES.<br/>Major product of fire is HCN gas.<br/>IF IN EYES, hold eyes open and flush with plenty of water.<br/>IF SWALLOWED and victim is CONSCIOUS, have victim drink water or milk and have victim induce vomiting.<br/>IF SWALLOWED and victim is UNCONSCIOUS OR HAVING CONVULSIONS, do nothing except keep victim quiet and warm.</p> |
| <p><b>Water Pollution</b></p>  | <p>HARMFUL TO AQUATIC LIFE IN VERY LOW CONCENTRATIONS.<br/>Soluble in water &amp; dispersible.<br/>May be adsorbed to &amp; create water column.<br/>Notify local health and wildlife officials.<br/>Notify operators of nearby water intakes.</p>  |
| <p><b>1. RESPONSE TO DISCHARGE</b><br/>(See Response Methods Handbook)<br/>Keep emergency water containment.<br/>Should be removed.<br/>Chemical and physical treatment.</p>   | <p><b>2. LABEL</b><br/>2.1 Category: None<br/>2.2 Class: Not pertinent</p>  |
| <p><b>3. CHEMICAL DESCRIPTIONS</b><br/>3.1 OD Concentration: Check for label<br/>3.2 Formula: C<sub>12</sub>H<sub>10</sub>Cl<sub>2</sub><br/>3.3 MSD/MSD Description: Not used<br/>3.4 DOT ID No.: 2761<br/>3.5 CAS Registry No.: 6881-15-2</p>  | <p><b>4. OBSERVABLE CHARACTERISTICS</b><br/>4.1 Physical State (as shipped): Very fine<br/>4.2 Color: Amber<br/>4.3 Odor: Mild kerosene odor</p>  |
| <p><b>5. HEALTH HAZARDS</b></p>  |   |
| <p>5.1 Personal Protective Equipment: Chloroacetylene resistant, rubber gloves, chemical goggles or face shield</p> <p>5.2 Symptoms Following Exposure: May be absorbed through skin, lungs, or chemical food. Symptoms include irritation, dry and itchy mucous membranes, headache, coughing, hyperexcitability, tremor, dizziness, acute conjunctivitis, skin related irritations of all chemical residues. LUNGS cause acute respiratory failure. Poisoning, effected as a result of the irritation from burning or decomposition, is first observed irritation of mucous membrane irritations, then irritation of both epithelia and nose at the mucous nose.</p> <p>5.3 Treatment of Exposure: If symptoms of poisoning appear, immediately remove the unabsorbed particles from the skin by rubbing clothing with warm soapy or soapy water if the patient is conscious or from the skin with soap and water. Keep patient warm and quiet. Call a physician.</p> <p>5.4 Threshold Limit Value: 0.5 mg/m<sup>3</sup></p> <p>5.5 Short Term Exposure Limit: Not pertinent</p> <p>5.6 Toxicity by Ingestion: Grade 4, LD50 below 50 mg/kg (dog)</p> <p>5.7 Low Toxicity: Data not available</p> <p>5.8 Vapor (and) Irritant Characteristics: The solid is non-volatile. For solutions, see sub-sections.</p> <p>5.9 Liquid or Solid Irritant Characteristics: Irritation hazard if inhaled on clothing and allowed to remain. May cause irritation and redness of the skin.</p> <p>5.10 Skin Threshold: Not pertinent</p> <p>5.11 SILV Value: 200 mg/m<sup>3</sup></p> |   |

|   |   |
|---|---|
| <p><b>6. FIRE HAZARDS</b></p> <p>6.1 Flash Point: 647 C.C. (solvent)<br/>6.2 Flammable Limits in Air: 1.1%-6.4% (solvent only)<br/>6.3 Fire Extinguishing Agents: Foam, dry chemical, or carbon dioxide<br/>6.4 Fire Extinguishing Agents: Not to be used. Water may be ineffective.<br/>6.5 Special Hazards of Combustion: Products: Toxic vapors are generated when heated.<br/>6.6 Behavior in Fire: Solution in water may produce explosive products when heated.<br/>6.7 Ignition Temperature: 657 C. (solvent)<br/>6.8 Maximum Pressure: Not pertinent<br/>6.9 Burning Rate: 0.6 cm/min<br/>6.10 Auto-ignition Temperature: Data not available</p> <p style="text-align: right;"><i>(Continued)</i></p> | <p><b>10. HAZARD ASSESSMENT CODE</b><br/>(See Hazard Assessment Handbook)<br/>D-A-T-U</p>   |
| <p><b>7. CHEMICAL REACTIVITY</b></p> <p>7.1 Reactivity with Water: No reaction<br/>7.2 Reactivity with Common Materials: No reaction<br/>7.3 Stability During Transport: Stable<br/>7.4 Inhibiting Agents for Acid and Corrosive: Not pertinent<br/>7.5 Polymerization: Not pertinent<br/>7.6 Initiator of Polymerization: Not pertinent<br/>7.7 Major Gases Evolved in Fire: Products: Data not available<br/>7.8 Reactivity Group: Data not available</p>   | <p><b>11. HAZARD CLASSIFICATIONS</b></p> <p>11.1 Grade of Federal Registration: CPMA-A<br/>11.2 MSD Hazard Rating for Bulk Water Transportation: Not used<br/>11.3 MSD Hazard Classification: Not used</p>  |
| <p><b>8. WATER POLLUTION</b></p> <p>8.1 Acute Toxicity:<br/>0.05 ppm/20 days/puffball/100%<br/>10/1000 water<br/>0.02 ppm*/1000/100% 10/1000 water<br/>0.0002 ppm/24 hours/100% 10/1000 water<br/>*Two puffs not counted.<br/>8.2 Waterway Toxicity: 20 g/m<sup>3</sup><br/>8.3 Biological Oxygen Demand (BOD): Data not available<br/>8.4 Food Chain Concentration Potential: None</p>   | <p><b>12. PHYSICAL AND CHEMICAL PROPERTIES</b></p> <p>12.1 Physical State at 15°C and 1 atm: White solid<br/>12.2 Molecular Weight: 214 (avg.)<br/>12.3 Boiling Point at 1 atm: Decomposes<br/>12.4 Freezing Point: 140-141°C<br/>= 60-60°C = 100-100°C<br/>12.5 Critical Temperature: Not pertinent<br/>12.6 Critical Pressure: Not pertinent<br/>12.7 Specific Gravity: 1.5 at 15°C (solid)<br/>12.8 Liquid Surface Tension: Not pertinent<br/>12.9 Liquid Water Vaporization: Toxicity: Not pertinent<br/>12.10 Vapor (and) Specific Gravity: Not pertinent<br/>12.11 Rate of Evaporation: Vapor (and) Not pertinent<br/>12.12 Latent Heat of Vaporization: Not pertinent<br/>12.13 Heat of Combustion: Not pertinent<br/>12.14 Heat of Decomposition: Not pertinent<br/>12.15 Heat of Solution: Not pertinent<br/>12.16 Heat of Polymerization: Not pertinent<br/>12.18 Heat of Fusion: Data not available<br/>12.19 Limiting Vapor: Data not available<br/>12.20 Heat Vapor Pressure: Data not available</p> |
| <p><b>9. SHIPPING INFORMATION</b></p> <p>9.1 Grade of Purity: Technical 40% and commercial 50% solution in water<br/>9.2 Storage Temperature: Ambient<br/>9.3 Inert Atmosphere: No requirement<br/>9.4 Filling: Sealed containers in well-ventilated area</p>   | <p><b>13. FIRE HAZARDS (Continued)</b></p> <p>13.1 Steam-to-Air Ratio: Data not available<br/>13.2 Flame Temperature: Data not available</p>  |

# Material Safety Data Sheet

From Genium's Reference Collection  
 Genium Publishing Corporation  
 1145 Catalyn Street  
 Schenectady, NY 12303-1836 USA  
 (518) 377-8855



NO. 318

XYLENE (Mixed Isomers)  
 (Revision D)  
 Issued: November 1980  
 Revised: August 1988

## SECTION 1. MATERIAL IDENTIFICATION

**Material Name:** XYLENE (Mixed Isomers)

**Description (Origin/Uses):** Used as a raw material for the production of benzoic acid, phthalic anhydride, isophthalic and terephthalic acids and their dimethyl esters in the manufacture of polyester fibers; in sterilizing caigut; with Canadian balsam as oil-immersion in microscopy; and as a cleaning agent in microscopic techniques.

**Other Designations:** Dimethylbenzene; Xylol; C<sub>8</sub>H<sub>10</sub>; CAS No. 1330-20-7

**Manufacturer:** Contact your supplier or distributor. Consult the latest edition of the *Chemicalweek*

*Buyers' Guide* (Genium ref. 73) for a list of suppliers.

**Comments:** Although there are three different isomers of xylene (*ortho*, *meta*, and *para*), the health and physical hazards of all three isomers are very similar. This MSDS is written for a xylene mixture of all three isomers, which is usually commercial xylene.



NFPA  
 HMIS  
 H 2  
 F 3  
 R 0  
 PPG\*  
 \*See sect. 8  
 R 1  
 I 3  
 S 2  
 K 3

## SECTION 2. INGREDIENTS AND HAZARDS

Xylene (Mixed Isomers), CAS No. 1330-20-7\*

\*o-Xylene, CAS No. 0095-47-6

m-Xylene, CAS No. 0108-38-3

p-Xylene, CAS No. 0106-42-3

\*\*Check with your supplier to determine if there are additions, contaminants, or impurities (such as benzene) that are present in reportable quantities per 29 CFR 1910.

\*\*\*Immediately dangerous to life and health.

\*\*\*\* See NIOSH, *NIIECS* (No. ZE2100000), for additional data with references to reproductive, irritative, and mutagenic effects.

%

## EXPOSURE LIMITS

IDLH\*\* Level: 1000 ppm

OSHA PEL

8-Hr TWA: 100 ppm, 435 mg/m<sup>3</sup>

ACGIH TLVs, 1987-88

TLV-TWA: 100 ppm, 435 mg/m<sup>3</sup>

TLV-STEL: 150 ppm, 655 mg/m<sup>3</sup>

Toxicity Data\*\*\*\*

Human, Inhalation, TC<sub>01</sub>: 200 ppm

Man, Inhalation, LC<sub>50</sub>: 10000 ppm/6 Hrs

Rat, Oral, LD<sub>50</sub>: 4300 mg/kg

## SECTION 3. PHYSICAL DATA

**Boiling Point:** 225°F to 293°F (135°C to 145°C)\*

**Melting Point:** -13°F (-25°C)

**Evaporation Rate:** 0.6 Relative to BuAc = 1

**Specific Gravity (H<sub>2</sub>O = 1):** 0.86

**Water Solubility (%):** Insoluble

**Molecular Weight:** 106 Grams/Mole

**% Volatile by Volume:** Ca 100

**Vapor Pressure:** 7 to 9 Torrs at 68°F (20°C)

**Vapor Density (Air = 1):** 3.7

**Appearance and Odor:** A clear liquid; aromatic hydrocarbon odor.

\*Materials with wider and narrower boiling ranges are commercially available.

## SECTION 4. FIRE AND EXPLOSION DATA

| Flash Point and Method      | Autoignition Temperature | Flammability Limits in Air | LOWER | UPPER |
|-----------------------------|--------------------------|----------------------------|-------|-------|
| 81°F to 90°F (27°C to 32°C) | 867°F (464°C)            | % by Volume                | 1%    | 7%    |

**Extinguishing Media:** Use foam, dry chemical, or carbon dioxide. Use water sprays to reduce the rate of burning and to cool containers.

**Unusual Fire or Explosion Hazards:** Xylene vapor is heavier than air and may travel a considerable distance to a low-lying source of ignition and flashback.

**Special Fire-Fighting Procedures:** Wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in the pressure-demand or positive pressure mode.

## SECTION 5. REACTIVITY DATA

Xylene is stable in closed containers during routine operations. It does not undergo hazardous polymerization.

**Chemical Incompatibilities:** This material may react dangerously with strong oxidizers.

**Conditions to Avoid:** Avoid any exposure to sources of ignition and to strong oxidizers.

**Hazardous Products of Decomposition:** Carbon monoxide (CO) may be evolved during xylene fires.

**SECTION 6. HEALTH HAZARD INFORMATION**

Xylene is not listed as a carcinogen by the IARC, NTP, or OSHA.

**Summary of Risks:** Liquid xylene is a skin irritant and causes erythema, dryness, and defatting; prolonged contact may cause blistering. Inhaling xylene can depress the central nervous system (CNS), and ingesting it can result in gastrointestinal disturbance; and possibly hematemesis (vomiting blood). Effects on the eyes, kidneys, liver, lungs, and the CNS are also reported. Medical Conditions Aggravated by Long-Term Exposure: Problems with eyes, skin, central nervous system, kidneys, and liver may be worsened by exposure to xylene. **Target Organs:** CNS, eyes, gastrointestinal tract, blood, liver, kidneys, skin. **Primary Entry:** Inhalation, skin contact/absorption. **Acute Effects:** Dizziness; excitement; drowsiness; incoordination; staggering gait; irritation of eyes, nose, and throat; corneal vacuolization; anorexia; nausea; vomiting; abdominal pain; and dermatitis. **Chronic Effects:** Reversible eye damage, headache, loss of appetite, nervousness, pale skin, and skin rash.

**FIRST AID:** **Eyes.** Immediately flush eyes, including under the eyelids, gently but thoroughly with plenty of running water for at least 15 minutes. **Skin.** Immediately wash the affected area with soap and water. **Inhalation.** Remove the exposed person to fresh air; restore and/or support his or her breathing as needed. Have a trained person administer oxygen. **Ingestion.** Never give anything by mouth to someone who is unconscious or convulsing. Vomiting may occur spontaneously, but do not induce it. If vomiting should occur, keep exposed person's head below his or her hips to prevent aspiration (breathing the liquid xylene into the lungs). Severe hemorrhagic pneumonitis with grave, possibly fatal, pulmonary injury can occur from aspirating very small quantities of xylene.

**GET MEDICAL HELP (IN PLANT, PARAMEDIC, COMMUNITY) FOR ALL EXPOSURES.** Seek prompt medical assistance for further treatment, observation, and support after first aid. If exposure is severe, hospitalization for at least 72 hours with careful monitoring for delayed onset of pulmonary edema is recommended.

**SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES**

**Spill/Leak:** Notify safety personnel, provide ventilation, and eliminate all sources of ignition immediately. Cleanup personnel need protection against contact with and inhalation of xylene vapor (see sect. 8). Contain large spills and collect waste or absorb it with an inert material such as sand, earth, or vermiculite. Use nonsparking tools to place waste liquid or absorbent into closable containers for disposal. Keep waste out of sewers, watersheds, and waterways.

**Waste Disposal:** Contact your supplier or a licensed contractor for detailed recommendations. Follow Federal, state, and local regulations.

**OSHA Designations**

Air Contaminant (29 CFR 1910.1000 Subpart Z)

EPA Designations (40 CFR 302.4)

RCRA Hazardous Waste, No. U239

CERCLA Hazardous Substance, Reportable Quantity: 1000 lbs (454 kg), per the Clean Water Act (CWA), section 311 (b) (9)

**SECTION 8. SPECIAL PROTECTION INFORMATION**

**Goggles:** Always wear protective eyeglasses or chemical safety goggles. Where splashing is possible, wear a full face shield as a supplementary protective measure. Follow OSHA eye- and face-protection regulations (29 CFR 1910.133). **Respirator:** Use a NIOSH-approved respirator per the *NIOSH Pocket Guide to Chemical Hazards* for the maximum-use concentrations and/or the exposure limits cited in section 2. Follow OSHA respirator regulations (29 CFR 1910.134). For emergency or nonroutine use (leaks or cleaning reactor vessels and storage tanks), wear an SCBA with a full facepiece operated in the pressure-demand or positive-pressure mode. **Warning:** Air-purifying respirators will not protect workers in oxygen-deficient atmospheres. **Other:** Wear impervious gloves, boots, aprons, gauntlets, etc., as required by the specifics of the work operation to prevent prolonged or repeated skin contact with xylene. **Ventilation:** Install and operate general and local maximum, explosion-proof ventilation systems powerful enough to maintain airborne levels of xylene below the OSHA PEL standard cited in section 2. Local exhaust ventilation is preferred because it prevents dispersion of xylene into general work areas by eliminating it at its source. Consult the latest edition of Genium reference 103 for detailed recommendations. **Safety Stations:** Make eyewash stations, safety/quick-drench showers, and washing facilities available in areas of use and handling. **Contaminated Equipment:** Contact lenses pose a special hazard; soft lenses may absorb irritants and all lenses concentrate them. Do not wear contact lenses in any work area. Remove contaminated clothing and launder it before wearing it again; clean xylene from shoes and equipment. **Comments:** Practice good personal hygiene; always wash thoroughly after using this material. Keep it off of your clothing and equipment. Avoid transferring it from your hands to your mouth while eating, drinking, or smoking. Do not eat, drink, or smoke in any work area. Do not inhale xylene vapor.

**SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS**

**Storage/Segregation:** Store xylene in a cool, dry, well-ventilated area away from sources of ignition and strong oxidizers. Protect containers from physical damage.

**Special Handling/Storage:** Make sure all engineering systems (production, transportation) are of maximum explosion-proof design. Ground and bond all containers, pipelines, etc., used in shipping, transferring, reacting, producing, and sampling operations.

**Transportation Data (49 CFR 172.101-2)**

DOT Shipping Name: Xylene

DOT ID No. UN1307

DOT Label: Flammable Liquid

DOT Hazard Class: Flammable Liquid

IMO Label: Flammable Liquid

IMO Class: 3.2 or 3.3

**References:** 1, 2, 12, 73, 84-94, 100, 103.

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Prepared by PJ Igoe, BS

Industrial Hygiene Review: DJ Wilson, CIH

Medical Review: MJ Hardies, MD

**APPENDIX D**  
**INCIDENT REPORT FORM**

**APPENDIX D  
FORM HS-502  
HAZARDOUS WASTE INCIDENT REPORT**

\_\_\_\_\_  
DATE                      PROJECT/LOCATION                      BUSINESS UNIT

DESCRIPTION OF INCIDENT, INCLUDING INJURIES, PROPERTY DAMAGE  
AND EMERGENCY ACTION TAKEN AND PERSONNEL INVOLVED (use  
additional sheets if needed):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

WITNESSES OF INCIDENT:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

POSSIBLE OR KNOWN CAUSES:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

WHAT ACTIONS ARE NEEDED TO PREVENT A SIMILAR INCIDENT?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
REPORTER

\_\_\_\_\_  
BUSINESS UNIT SAFETY OFFICER

\_\_\_\_\_  
PROJECT MANAGER

\_\_\_\_\_  
CORPORATE HEALTH AND SAFETY  
OFFICER

APPENDIX E  
HNU PHOTOIONIZATION DETECTOR

**APPENDIX E**

**HNU PHOTOIONIZATION DETECTOR (MODEL PI 101)**

The instrument is turned to the battery check position first. Assuming proper charge, the main control switch is set to the standby position using the zero knob. The instrument is then allowed to warm up for above five minutes in the standby mode. The calibration gas (usually isobutylene from the HNU factory) is attached. The proper range setting is selected (usually 0-200 ppm) and the calibration gas turned on.

The gas flows through a critical orifice which reduces its flow rate to the proper rate for calibration purposes. The normal factory calibration of this instrument is for benzene in air. Isobutylene is used for normal calibration because it is less toxic. The relative response of isobutylene as compared to benzene is about 70 percent with the 10.2 eV and 11.7 eV lamps (there is a slight difference between the relative response of the two different energy probes, but it is not considered significant for most field calibration purposes). Accordingly, a bottle of isobutylene calibration gas that contains 100 ppm isobutylene will read out as about 70 ppm on a factory calibrated instrument. A bottle of factory calibration gas will state the proper readout on the instrument "as benzene".

If the instrument does not calibrate exactly, the span pot knob is normally adjusted to bring the instrument into calibration. The normal "factory" settings are 9.8 for the 10.2 eV lamp and 5.90 for the 11.7 eV lamp. If the instrument cannot be brought into calibration by using the span pot, the lamp may need to be cleaned or other maintenance items performed so that the unit will calibrate accurately.

**RFI COMMUNITY RELATION PLAN**

**VICKSBURG CHEMICAL COMPANY  
VICKSBURG, MISSISSIPPI**

Prepared for  
Vicksburg Chemical Company  
Vicksburg, Mississippi

December 1995

WCC File 92B007C-3003

**Woodward-Clyde** 

Woodward-Clyde Consultants  
2822 O'Neal Lane  
Baton Rouge, Louisiana 70816

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Table 1 Schedule of Community Relations Activities

**OVERVIEW OF COMMUNITY RELATIONS**

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This Community Relations Plan (CRP) for the Vicksburg Chemical Company (VCC) in Vicksburg, Mississippi, has been prepared in response to a Consent Decree entered April 17, 1992. The Community Relations Plan presented herein describes the mechanism for the dissemination of information to the public regarding RCRA Facility Investigation (RFI) activities and results. The CRP describes the history of the site, the affected community, and community concerns about the site. It also describes community relations objectives and techniques for implementing the community relations program. The community relations program will provide the public an opportunity to participate in the decision-making process regarding remedial actions at the site and inform the public of current and future site activities.

This CRP is a working document that serves as a guide for communicating with the affected community. Activities and schedules may be altered according to future circumstances.

The information in this CRP was obtained from Environmental Protection Agency (EPA) and Mississippi Department of Environmental Quality (MSDEQ) files and interviews with VCC concerning their interaction with local residents and government officials. Interviews were conducted to determine the general level of awareness and concerns of the community regarding the site.

**SITE OPERATIONAL, OWNERSHIP AND  
PERTINENT REGULATORY HISTORY**

---

**2.1 OPERATIONAL AND OWNERSHIP HISTORY**

The Vicksburg Chemical Company within the Cedar Chemical Corporation is located in Warren County, Mississippi along the Mississippi River immediately on the south limits of Vicksburg. About 70 acres border on the Mississippi River, however, none of the plant production facilities is located along the river. The address is:

Vicksburg Chemical Company  
Post Office Box 821003  
Rifle Range Road  
Vicksburg, Mississippi 39182-1007

The facility is a manufacturer of chemicals. The 650 acre plant site is divided into two separate and distinct operations known as the North Plant and the South Plant. Active operations are conducted or have been conducted on about 130 acres.

In operation since 1961, the North Plant produces potassium nitrate, liquid chlorine and liquid nitrogen tetroxide. The raw materials for the North Plant include potassium chloride and nitric acid. The potassium nitrate is sold for various industrial uses. Most nitrogen tetroxide is sold to the government as an oxidizer for rocket fuels.

The South Plant, in operation since 1953, formerly manufactured chlorinated pesticides, nitrogen based herbicides, and other agricultural chemicals. The active operations at the South Plant are a modern (plant constructed in 1986) nitric acid unit and a new potassium carbonate plant (plant constructed in 1995). The manufactured nitric acid is used primarily in the North Plant as a raw material. During various periods prior to 1987, the South Plant produced dinitro butyl phenol (dinoseb or DNBP), monosodium methane arsonate (MSMA), diethylhexylphosphoric acid (DEHPA), 1-hydroxy-ethylidene-1,1-diphosphonic acid (UNIHIB), toxaphene, methyl parathion, cyanazine (bladex), and atrazine. Toxaphene and

methyl parathion are insecticides, while atrazine, dinoseb, and MSMA are herbicides. Raw materials for the formerly operating processes included chlorine, camphene, ortho secondary butyl phenol (OSBP), sodium arsenite, sodium hydroxide, methyl chloride, sulfuric acid, paranitrophenol, and phosphoric trichloride.

Originally, the two plants were completely separate, owned and operated by two different companies. The South Plant was originally constructed by Spencer Chemical in 1953 to produce agricultural chemicals: ammonia, nitric acid, urea, and ammonium nitrate. After purchasing the facility in 1964, Gulf Chemical added a formaldehyde unit in 1966. American Metal Climax Corporation (Amax) constructed the North Plant in 1961 to produce chloride-free potassium nitrate for selected crops in the southeast United States, such as tobacco, tomatoes, and certain vegetables. The main reason the potassium nitrate plant was built at Vicksburg, Mississippi was the availability of nitric acid from the adjacent Gulf Oil installation. The Amax plant was also referred to as the Southwest Potash Division.

Vicksburg Chemical Company was formed in early 1972 and purchased both Gulf Oil and Amax Chemical facilities except the formaldehyde plant on July 12, 1972. Production, under the new management, began in October of the same year. VCC then operated the nitric acid, potassium nitrate, and nitrate solutions plants about 2 1/2 years. By September, 1974, five more facilities were built for atrazine, methyl parathion, dinoseb, toxaphene, and UDMH (Unsymmetrical Dimethyl Hydrazine) production. The UDMH facility process was experimental and not well defined. Consequently, the UDMH process was eliminated due to production problems and economic reasons.

In 1978, Vicksburg Chemical Company was merged into Vertac, Inc. Effective September 1, 1979, Vertac, Inc. was merged into Vertac Chemical Corporation (Vertac). In February, 1986, Cedar Chemical Corporation acquired the Vicksburg Chemical plant from Vertac. Fermenta A.B. of Sweden acquired Cedar Chemical Corporation in June, 1986 and Nine West Corporation (Trans Resources, Inc.) acquired Cedar Chemical Corporation in January, 1988.

## 2.2 PERTINENT REGULATORY HISTORY

Vertac first registered the Vicksburg plant as a pesticide producing site on July 2, 1979. A Notification of Hazardous Waste Activity was submitted on June 23, 1980. On November 18, 1980 a Resource Conservation and Recovery Act (RCRA) Part A permit application was filed to *gain interim status to store and handle hazardous waste*. Vertac registered as producing potassium nitrate, dinoseb and toxaphene at the Vicksburg facility.

Vertac submitted a RCRA Part B permit application on August 10, 1983 along with a modified Part A permit application. The original Part A application had included an 80-foot by 80-foot "greater than 90-day" hazardous Drum Storage Area and the Surface Impoundment both located at the South Plant. The drummed wastes stored in the Drum Storage Area contained hazardous constituents; therefore, to ensure proper disposal, the waste were manifested by Vertac as hazardous wastes and the RCRA permit for storage was requested from the regulatory agency. After the drums of waste were sent offsite for disposal, the RCRA permit application for the Drum Storage Area became unnecessary and hence the modification to the Part A consisting of removing the "greater than 90-day" hazardous Drum Storage Area from the RCRA application was submitted. A second Part B application was filed on June 18, 1985 even though Cedar was attempting to reach agreement that a RCRA permit was not necessary on the basis that the Surface Impoundment did not qualify as a RCRA-regulated unit.

The Vicksburg facility was contracted to be sold to Cedar in 1985. The new ownership continued the negotiations with the regulatory agencies in an attempt to come to an agreement on the regulatory status of the Surface Impoundment at the plant. A hearing on the issue was scheduled for July 22, 1986 before the Mississippi Commission on Natural Resources. Cedar's position regarding the surface impoundment was based on the de minimis exemption to the mixture rule contained in 40 CFR Part 261.3. De minimis losses are defined to include losses from minor spills, leaks from pipes and valves, minor leaks from process equipment, and leaks from well-maintained pump packings and seals which would occur during normal manufacturing operations.

In December, 1986 and again on August 5, 1987, Mississippi Department of Natural Resources (MSDNR) ruled that the Surface Impoundment was not required to be RCRA regulated.

Additionally, Cedar requested a meeting with the EPA to discuss regulatory issues. On December 17, 1987 representatives from Cedar, MSDNR, and EPA met to further discuss the Surface Impoundment. Cedar proposed to consolidate the contaminated sediment into a Solid Waste Containment Area, solidify it, and cap it in such a way as to continue to be able to use the rest of the impoundment for the accumulation of rainwater runoff prior to treatment. Cedar also proposed to line the impoundment with a double synthetic liner and to continue to use the surface impoundment after containment of the existing sediment.

Cedar submitted an engineered closure plans to the MSDNR on August 4, 1988. The MSDNR suggested some modifications to the plan for meeting RCRA requirements and Cedar agreed to go forward with the modified plan unless EPA voiced an objection. On January 27, 1989, Cedar reported to the MSDNR that a contract to implement the closure plan had been entered into and that the contractor had moved on site to begin closure of the impoundments. The construction has been completed.

In June of 1988 an Administrative Order for Interim Measures was drafted by EPA Region IV. The Order called for Cedar to conduct a RCRA Facility Investigation to determine the extent of any contamination; and for a Corrective Measures Study to evaluate the best solution for containment and/or clean-up of the facility as required. Based on previous inspections and a February, 1989 Sampling Investigation, the Director of Waste Management, Region IV, issued a Determination of Release for Cedar on October 12, 1989. By October 20, 1989 a draft Endangerment Assessment was completed regarding contamination at the Vicksburg Facility of Cedar. Negotiations for a Consent Decree began in January of 1990 and were completed in December of 1990. The Consent Decree was entered in the form previously negotiated on April 17, 1992.

**COMMUNITY BACKGROUND**

---

The following subsection describes the Vicksburg Community, past community involvement with the site, and major concerns expressed by local officials and residents during community interviews.

**3.1 COMMUNITY PROFILE**

A blend of tradition and progress has established Vicksburg as a modern city, yet one which retains the charm of the "Old South". Vicksburg has an interesting and diverse history. First claimed by the French in 1680, along with every foot of land drained by the Mississippi River, the area was later transferred to Spain by King Louis XV. Spain in turn sold the land to the United States in 1795.

Georgia organized the County of Bourbon in southwest Mississippi and in 1795 sold huge tracts of land to syndicates for speculation. In 1798 Congress bought the Georgia claims and created the territory of Mississippi. Warren County was organized in 1817. Vicksburg, "America's River Port City", was founded in 1812 on the plantation of William Vick and John Lane, and by 1825 was a thriving frontier settlement. From this time until the Civil War, the community continued to grow and by 1861, was a well-ordered and prosperous city.

Vicksburg's role during the days when civil strife scarred the nation is historic. Modern writers have called it "The Gibraltar of the Confederacy", for whichever force held the bluffs controlled the vital Mississippi River and the country to the west. The Confederates, surrounded, with few supplies, little ammunition, and no prospects of reinforcement, were finally starved out and forced to surrender the city to Union General U.S. Grant on July 4, 1863.

In 1899, by act of Congress, the Vicksburg National Military Park was created. This park, now a part of the National Park System, was established to preserve the field of battle and scenic and historic heritage of Vicksburg. It is considered by many as one of the country's most beautiful national memorials.

Reconstruction was a trying period for the city, as it was for the entire South. Civic progress was slow. Only because this was the era of the packet boat, coupled with Vicksburg's location which made her a center for the steamboat trade, was it possible for the community to prosper.

However, on April 27, 1876, the Mississippi River cut itself off from Vicksburg, south of the city, leaving the city's wharf high and dry. The U.S. Army Corps of Engineers began work in 1892 to divert the Yazoo River into the old Mississippi river bed thus restoring a harbor on the river. Work on the new canal was completed in January, 1903.

Now a city with a sound basic economy, Vicksburg can look to the future with confidence that her strategic location will lead to a commercial prominence. VCC provides employment for a large number of residents in the Vicksburg area.

### **3.2 CHRONOLOGY OF COMMUNITY INVOLVEMENT**

VCC has conducted its own community relations activities to keep the community informed through dissemination of information.

VCC has:

- Issued news releases on the Corrective Action Program.
- Conducted information on site briefings with Cedar production supervisors, most of whom are residents of the community.
- Set-up a speakers bureau and offered to meet with groups or organizations when requested.
- Published information booklets and distributed them to government and Elected Officials in Vicksburg, selected State Officials and business and opinion leaders in Vicksburg.

- Held an open meeting on a Request For a Temporary Unit in the public library. The meeting date was publicized in local and state-wide newspapers. The Temporary Unit is a designated area where pilot plant studies are being conducted to test the biodegradation of site-specific contaminants in soil.
- Held an open meeting on the Preliminary Report (Report of Current Conditions) and the Closure Plan, SWMU 1 - Hazardous Waste Storage Area, SWMU 17 - Off-Specification Product Storage Area in the public library on March 5, 1996. The meeting date was publicized in local and state-wide newspapers.

**COMMUNITY RELATIONS OBJECTIVES**

---

The community relations program for the site is designed to inform and educate the local government officials and residents of current site conditions and remedial alternatives. The community relations program will present the community with a clear description of the Corrective Action Process and will encourage the community to voice opinions on present and future site activities.

Currently, concern among local officials and the community residents is low. Because community interest may change as more information on the site becomes available, the community relations program should be flexible to respond to changing interests and concerns. Objectives for the community relations program are:

- Encourage the support and interest of local government officials in community relations activities.
- Inform local residents of all site activities to ensure that the public receives accurate information on site findings and developments as they occur, solicit comments on a continuing basis, and increase public awareness of the site activities.
- *Encourage and facilitate positive interaction among government agencies, local officials, and concerned citizens to foster trusting relationships among the parties involved and provide open lines of communication.*
- Provide opportunities for community involvement, and solicit input on remedial activities to address community concerns. Local residents should be encouraged to contact EPA officials if new or additional concerns arise during remedial activities.
- Inform the local media of major site activities to increase public awareness and knowledge of the site.

COMMUNITY RELATIONS ACTIVITIES

---

The following community relations activities have been selected to inform the public of site activities and to meet the community relations objectives outlined in Section 4.0:

- **Information Repository** - Establish an information repository to include information on the Corrective Action Program and various site documents. The information repository will be updated as information becomes available. All items will be available for public inspection and copying. The local repository is the VCC Plant site. The contact person is the Plant Manager or the Director of Environmental Affairs.

- **Notifications and Briefings** - Periodically contact local government officials and residents to update them on the site status. Contact can be made by telephone, letters, public notices, and briefing meetings. Contact will be made at the completion of the RFI/CMS, and as needed during remedial activities.

Two summary notices will be sent to local government officials about the site. The first notice will be sent at the completion of the RFI to present information on sampling results and to address local officials' questions and concerns regarding the RFI and the upcoming CMS. The second notice will present information on CMS results and the proposed plan for corrective action.

- **Public Comment Period** - A 30-day period will be provided to give the public an opportunity to review and comment on the CMS and proposed plan for the site.
- **Prepare Public Notices** - A public notice will be published at least two weeks before the start of the 30-day comment period. This public notice may take the form of a display advertisement in the local newspapers.

This public notice may also be broadcast through local radio and television public service announcements. Local media may be informed of site events through mailings of fact sheets and public notices.

- **Fact Sheets** - Three fact sheets will be prepared to keep the public informed of site activities.

The first fact sheet has been issued, and included information on the following:

- The Cedar Corporation/Vicksburg Plant Site;
- The Corrective Action Process;
- Initiation of the RFI/CMS; and
- Opportunities for public involvement

The second fact sheet will describe RFI results and proposed CMS activities. This fact sheet should be prepared and distributed after completion of the final RFI report.

The third fact sheet will address the proposed corrective action plan, describe the CMS results and the preferred alternative, and the Agency's rationale for this preference. This fact sheet should be prepared and distributed, after the CMS is complete and a preferred alternative has been selected, to solicit comments during a 30-day comment period.

The fact sheets will include the name, address and telephone numbers of Federal and State contacts directly involved with site activities.

- **Public Meeting** - VCC will conduct other community relations activities, such as an open meeting at the public library to provide information or obtain community input. Two public meetings have been held to date, one on the Request For Temporary Unit and one on the Preliminary Report and Closure Plan, SWMU 1 - Hazardous Waste Storage Area, SWMU 17 - Off-Specification Product Storage Area.

- **Review of CRP - VCC** will review this plan periodically, particularly after a remedy is selected, to determine if changes are needed to insure an effective community relations effort for the VCC site.

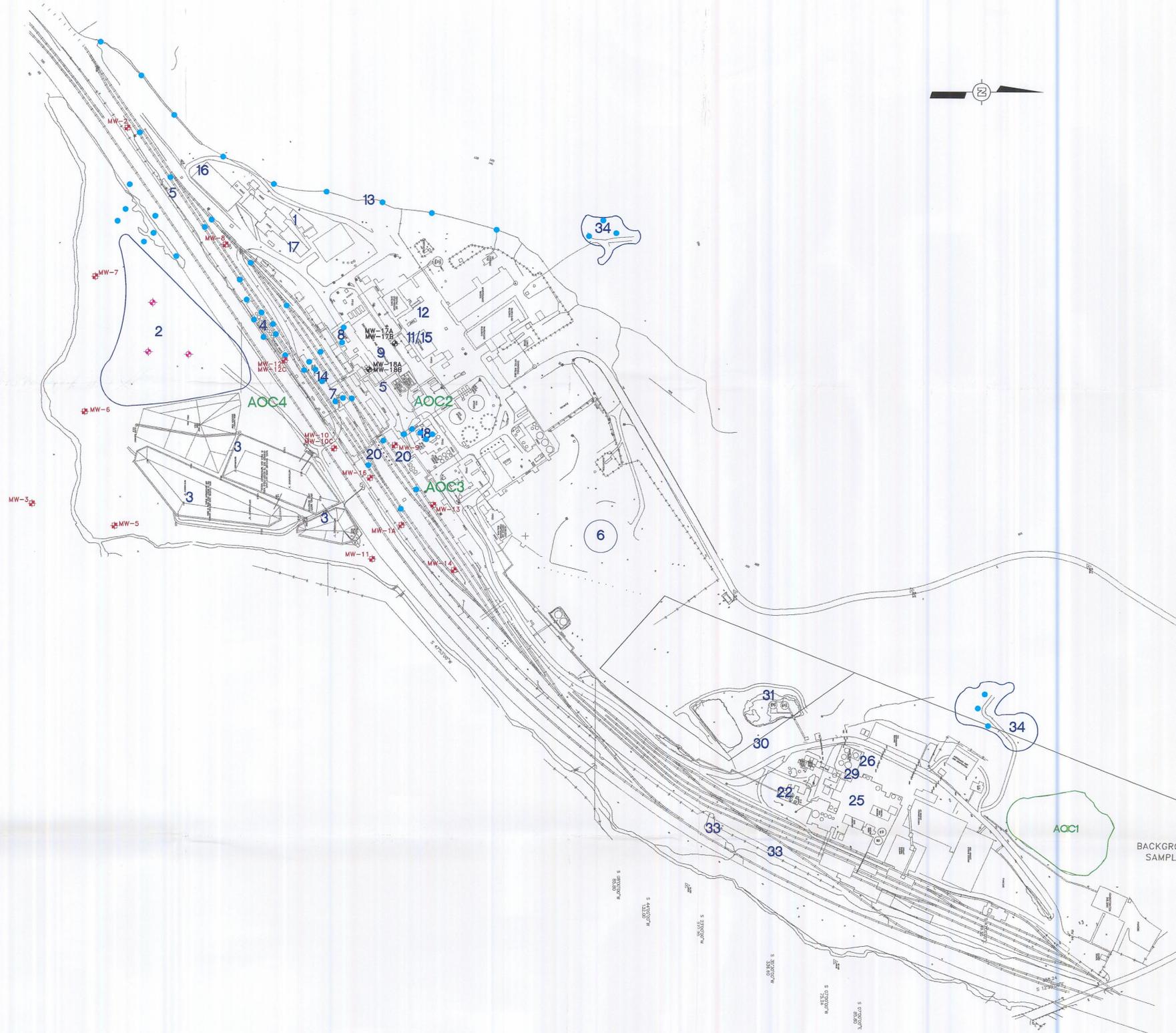
**SCHEDULE OF ACTIVITIES**

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The following table presents a schedule of community relations activities for the site. Each community relations activity described in Section 5.0 is coordinated with an approval milestone of the RFI/CMS process. A "\*" designates the appropriate time to conduct the community relations activity associated with the milestone. A "\*\*\*" indicates the activity has taken place.

| Community Relations Activity    | Milestone      |                |   |                                   |                        |              |            |             |           |             |           |
|---------------------------------|----------------|----------------|---|-----------------------------------|------------------------|--------------|------------|-------------|-----------|-------------|-----------|
|                                 | Consent Decree | Temporary Unit | Preliminary Report, Closure Plan, SWMU 1 and 17 | RFI Workplan, GWA Workplan, PECMT | RFI Report, GWA Report | CMS Workplan | CMS Report | CD Workplan | CD Report | CI Workplan | CI Report |
| News Release                    | **             |                |   |                                   |                        |              |            |             |           |             |           |
| Internal Briefings              | **             | **             | **  | *                                 | *                      | *            | *          | *           | *         | *           |           |
| Notification (Local Government) | **             |                |   |                                   | *                      |              | *          |             |           |             | *         |
| Public Notice (Newspaper)       | **             | **             | **  | *                                 | *                      | *            | *          | *           | *         | *           |           |
| Fact Sheet                      | **             |                |   |                                   | *                      |              | *          |             |           |             |           |
| Public Meeting                  | **             | **             | **  | *                                 | *                      | *            | *          | *           | *         | *           |           |
| Information Reporting           | **             | **             | **  | *                                 | *                      | *            | *          | *           | *         | *           | *         |

Woodward-Clyde



| SWMU NUMBER | SOUTH PLANT                             |
|-------------|---|
| 1           | CONTAINER (DRUM) STORAGE AREA           |
| 2           | INACTIVE LANDFILL                       |
| 3           | SURFACE IMPOUNDMENT (SOUTH PLANT)       |
| 4           | ACTIVATED CARBON TREATMENT UNITS        |
| 5           | SOUTH PLANT DRAINAGE SYSTEMS            |
| 6           | WASTEWATER STORAGE (HILL) TANKS         |
| 7           | FORMER DINOSEB PRODUCTION AREA          |
| 8           | DINOSEB LOADING/UNLOADING AREA          |
| 9           | DINOSEB DRUMMING AREA                   |
| 11          | FORMER MSMA PRODUCTION AREA             |
| 12          | FORMER MSMA SALT UNLOADING AREA         |
| 13          | SOUTH PLANT DRAINAGE DITCHES            |
| 14          | FORMER TOXAPHENE PRODUCTION AREA        |
| 15          | FORMER METHYL PARATHION PRODUCTION AREA |
| 16          | FORMER ATRAZINE PRODUCTION AREA         |
| 17          | RETURNED PRODUCT STORAGE AREA           |
| 18          | FORMER BLUE TANK AREA                   |
| 20          | RAILROAD CAR UNLOADING STATION          |

| NORTH PLANT |  |
|-------------|--|
| 22          | NORTH PLANT NEUTRALIZATION SYSTEM              |
| 23          | EQUALIZATION/NEUTRALIZATION POND (NORTH PLANT) |
| 25          | NORTH PLANT WASTEWATER PIPES                   |
| 26          | C-10 SCRUBBER                                  |
| 29          | OIL COLLECTION UNIT                            |
| 30          | NORTH PLANT WASTE OIL ACCUMULATION AREA        |
| 31          | NO. 6 FUEL OIL AREA                            |
| 33          | NORTH PLANT DRAINAGE DITCHES                   |

| BOTH PLANTS |                                      |
|-------------|--------------------------------------|
| 34          | SURPLUS EQUIPMENT STORAGE (JUNKYARD) |

| AOC NUMBER | AOC NAME                           |
|------------|------------------------------------|
| 1          | FISH POND (NORTH PLANT)            |
| 2          | DRUM STORAGE AREA                  |
| 3          | NEUTRALIZATION TANKS (SOUTH PLANT) |
| 4          | CHEMICAL CRYPT (SEPTIC TANKS)      |

**LEGEND**

- ◆ DEEP BORINGS
- ◆ MW-17A, MW-17B, MW-18A, MW-18B, MW-10C, MW-12C ARE PROPOSED LOCATIONS
- SHALLOW BORINGS
- ◆ EXISTING MONITOR WELLS

SCALE  
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|     |                         |    |      |

VICKSBURG CHEMICAL COMPANY  
VICKSBURG, MISSISSIPPI

**URS Greiner Woodward Clyde**  
2822 O'Neal Lane  
Baton Rouge, Louisiana 70816  
225/751-1873

|                    |                      |
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| REFERENCE DRAWINGS | SCALE: 1"=200'       |
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|                    | DRAWN: PCG           |
|                    | CHECKED: [Signature] |
|                    | PEER REVIEWED:       |
|                    | DATE: 10/7/99        |

RCRA FACILITY INVESTIGATION

SWMU LOCATIONS, RFI SOIL AND CONCRETE  
SAMPLE POINTS, GWA MONITOR WELL LOCATIONS

|          |            |
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| REVISION | △          |
| PROJECT: | 350096B315 |
| DRAWING: | 1          |



| SWMU NUMBER | SOUTH PLANT                             |
|-------------|---|
| 1           | CONTAINER (DRUM) STORAGE AREA           |
| 2           | INACTIVE LANDFILL                       |
| 3           | SURFACE IMPOUNDMENT (SOUTH PLANT)       |
| 4           | ACTIVATED CARBON TREATMENT UNITS        |
| 5           | SOUTH PLANT DRAINAGE SYSTEMS            |
| 6           | WASTEWATER STORAGE (HILL) TANKS         |
| 7           | FORMER DINOSEB PRODUCTION AREA          |
| 8           | DINOSEB LOADING/UNLOADING AREA          |
| 9           | DINOSEB DRUMMING AREA                   |
| 11          | FORMER MSMA PRODUCTION AREA             |
| 12          | FORMER MSMA SALT UNLOADING AREA         |
| 13          | SOUTH PLANT DRAINAGE DITCHES            |
| 14          | FORMER TOXAPHENE PRODUCTION AREA        |
| 15          | FORMER METHYL PARATHION PRODUCTION AREA |
| 16          | FORMER ATRAZINE PRODUCTION AREA         |
| 17          | RETURNED PRODUCT STORAGE AREA           |
| 18          | FORMER BLUE TANK AREA                   |
| 20          | RAILROAD CAR UNLOADING STATION          |

| SWMU NUMBER | NORTH PLANT                                    |
|-------------|--|
| 22          | NORTH PLANT NEUTRALIZATION SYSTEM              |
| 23          | EQUALIZATION/NEUTRALIZATION POND (NORTH PLANT) |
| 25          | NORTH PLANT WASTEWATER PIPES                   |
| 26          | C-10 SCRUBBER                                  |
| 29          | OIL COLLECTION UNIT                            |
| 30          | NORTH PLANT WASTE OIL ACCUMULATION AREA        |
| 31          | NO. 6 FUEL OIL AREA                            |
| 33          | NORTH PLANT DRAINAGE DITCHES                   |

| SWMU NUMBER | BOTH PLANTS                          |
|-------------|--------------------------------------|
| 34          | SURPLUS EQUIPMENT STORAGE (JUNKYARD) |

| AOC NUMBER | AOC NAME                           |
|------------|------------------------------------|
| 1          | FISH POND (NORTH PLANT)            |
| 2          | DRUM STORAGE AREA                  |
| 3          | NEUTRALIZATION TANKS (SOUTH PLANT) |
| 4          | CHEMICAL CRYPT (SEPTIC TANKS)      |

- LEGEND**
- ◆ DEEP BORINGS
  - ⊕ NEW MONITOR WELL LOCATIONS
  - SHALLOW BORINGS
  - ⊕ EXISTING MONITOR WELLS



| NO. | REVISION | DATE | INITIAL |
|-----|----------|------|---------|
|     |          |      |         |
|     |          |      |         |
|     |          |      |         |

**RCRA FACILITY INVESTIGATION AND  
GROUNDWATER ASSESSMENT**

**WOODWARD-CLYDE CONSULTANTS**  
Consulting Engineers, Geologists  
and Environmental Scientists  
Baton Rouge, Louisiana

**VICKSBURG CHEMICAL COMPANY**  
VICKSBURG, MISSISSIPPI

|         |                 |                |          |
|---------|-----------------|----------------|----------|
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| 1"=200' | CHECKED BY: RDK | DATE: 7/19/96  | 92B007C  |

SWMU LOCATIONS, RFI SOIL AND CONCRETE  
SAMPLE POINTS, GWA MONITOR WELL LOCATIONS

FIGURE  
**1**

K:\CAD-615\VICKSBURG\92B007C\Fr1 Jul 19 10:36:48 1996