



December 20, 2004

Mr. Bob Priest
General Manager
Clarksdale Utilities
PO Box 70
Clarksdale, Mississippi 38614

Re: Discharge of Treated Storm Water From Red Panther Site
Phase II Soil Removal
Clarksdale, Mississippi

Dear Mr. Priest:

In March 2005, the URS Corporation, on behalf of the Red Panther Potentially Performing Responsible Parties (PRPs) will begin the soil cleanup at the Red Panther Site. The cleanup will involve excavating and transporting arsenic and pesticide impacted soils above the USEPA Region IV cleanup standards to an offsite disposal facility for treatment.

During the soil removal, EPA and MDEQ will require URS to contain any storm water at the site that comes into contact with the disturbed impacted soils for treatment. As we discussed on the telephone on December 10, 2004, URS would like to discharge the treated storm water to the Clarksdale POTW. Mr. Robert Huckaby, the Project Manager for MDEQ and Mr. Dallas Baker with the MDEQ Environmental Permitting Section, have requested URS provide MDEQ with a letter indicating that Clarksdale Utilities will accept the treated water before determining if a permit is required.

URS previously performed a soil excavation project in the offsite ditches in 2002 at the Red Panther Site and had to contain storm water in the ditches similar to what is required under this project. Analysis of the storm water (prior to treatment) during the 2002 removal indicated the storm water contained low concentrations of arsenic (<4.0 milligrams per liter or mg/L), pesticides (<200 micrograms per liter or ug/L), and various other inorganic metals. Copper was not detected in the untreated stormwater sample above the laboratory detection limit of 0.2 mg/L. See the attached analytical data of the untreated sample.

During this project, URS will have a treatment system onsite to treat the storm water if testing indicates it exceeds any discharge parameters that may be set by MDEQ or Clarksdale Utilities. A typical portable treatment system would consist of holding tanks (frac tanks or poly tanks) prior to treatment, a treatment system (commonly sand and gravel filters and activated carbon treatment), and post treatment holding tanks for testing prior to discharge.

URS Corporation
400 Northpark Town Center
1000 Abernathy Road, NE
Suite 900
Atlanta, GA 30328
Tel: 678.808.8800
Fax: 678.808.8400

Mr. Bob Priest
General Manager
Clarksdale Utilities
December 20, 2004
Page 2 of 2

Any treated storm water discharged during the removal will typically consist of a batch discharge that would occur after rainfall events. URS anticipates that the discharges will be required after storm water events requiring the containment of impacted storm water.

The anticipated discharge rate will be less than 20,000 gallons per day (24 hour permit). URS would propose to discharge the treated storm water to the sanitary sewer manhole located onsite. The timeframe for the discharges to the POTW is from April 2005 and to approximately August 2005.

Please sign in the space provided below if the City of Clarksdale would tentatively based on the limited information provided herein agree to accept the discharge to the POTW under a MDEQ Pretreatment Permit.

Bob Priest
General Manager
City of Clarksdale Public Utilities

-oOo-

If you have any questions or need additional information, please contact me at (678) 808-8915 or email me at Brent_Jacobs@URScorp.com.

Yours very truly,
URS Corporation



Brent B. Jacobs, P.G.
Project Coordinator

Cc: Mr. Robert Huckaby, P.E., Mississippi Department Environmental Quality
Mr. Dallas Baker, Mississippi Department Environmental Quality
Mr. Steve Spurlin, USEPA Region IV



ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis

110 Technology Parkway Norcross, GA 30092

(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Report Number **167175**

Project: Red Panther Clarksdale MS, Project#37778-010

Prepared For:

URS - Atlanta

235 Peachtree Street, N.E.

North Tower, Suite 2000

Atlanta, GA 30303

Attention: Mr. Brent Jacobs

December 6, 2002

P.O. No. 37778-010

We appreciate the opportunity to provide the analytical support for your project. The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Project Manager

Quality Assurance



Definitions of Terms

- B** - Found in Laboratory Blank
- BDL** - Below Detection Limit
- C** - Co-eluting Isomer Present
- E** - Estimated Concentration
- F** - Positively Identified Below the Reporting Limit
- H** - Results Within Limits, See Attached
- J** - Estimated Concentration
- M** - A Matrix Effect was Determined to be Present in the Sample
- ND** - None Detected
- R** - The Data is Unusable Due to the Inability to Analyze the Sample
and Meet the Quality Control Criteria
- TIC** - Tentatively Identified Compound
- U** - Not Detected at the Level Reported
- CFU** - Colony Forming Units

NOTE: Unless otherwise noted, all results are reported on an as received basis.



ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis

110 Technology Parkway Norcross, GA 30092

(770) 734-4200 FAX (770) 734-4201

Laboratory Report

URS - Atlanta
235 Peachtree Street, N.E.
North Tower, Suite 2000
Atlanta, GA 30303

Attention: Mr. Brent Jacobs
Report No. 167175-1

December 6, 2002

Sample Description

URS - Atlanta

Storm Water, Grab, Red Panther Clarksdale MS, Project#37778-010, SW-1, 11/25/2002, 13:30, received 11/26/2002

Analytical

Method	Analyte	Result	Detection Limit	Units
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Target Analyte List - Metals

Metals

EPA 6010B	Total Aluminum (Al)	1.9	0.2	mg/L
EPA 6010B	Total Antimony (Sb)	BDL	0.05	mg/L
EPA 6010B	Total Arsenic (As)	0.62	0.02	mg/L
EPA 6010B	Total Barium (Ba)	0.10	0.01	mg/L
EPA 6010B	Total Beryllium (Be)	BDL	0.005	mg/L
EPA 6010B	Total Cadmium (Cd)	BDL	0.005	mg/L
EPA 6010B	Total Calcium (Ca)	35	0.05	mg/L
EPA 6010B	Total Chromium (Cr)	BDL	0.01	mg/L
EPA 6010B	Total Cobalt (Co)	BDL	0.05	mg/L
EPA 6010B	Total Copper (Cu)	BDL	0.02	mg/L
EPA 6010B	Total Iron (Fe)	1.7	0.1	mg/L
EPA 7421	Total Lead (Pb)	BDL	0.003	mg/L
EPA 6010B	Total Magnesium (Mg)	5.8	0.05	mg/L
EPA 6010B	Total Manganese (Mn)	0.33	0.015	mg/L
EPA 7470A	Total Mercury (Hg)	BDL	0.0002	mg/L
EPA 6010B	Total Nickel (Ni)	BDL	0.02	mg/L
EPA 6010B	Total Potassium (K)	2.7	0.2	mg/L
EPA 7740	Total Selenium (Se)	BDL	0.005	mg/L
EPA 6010B	Total Silver (Ag)	BDL	0.01	mg/L
EPA 6010B	Total Sodium (Na)	31	0.05	mg/L
EPA 7841	Total Thallium (Tl)	BDL	0.01	mg/L
EPA 6010B	Total Vanadium (V)	BDL	0.05	mg/L
EPA 6010B	Total Zinc (Zn)	0.06	0.02	mg/L

Pesticides

Sample Description
URS - Atlanta

Storm Water, Grab, Red Panther Clarksdale MS, Project#37778-010, SW-1, 11/25/2002, 13:30, received 11/26/200

Analytical Method	Analyte	Result	Detection Limit	Units
EPA 8081A	Aldrin	BDL	0.1	ug/L
EPA 8081A	BHC-alpha	12.2	0.1	ug/L
EPA 8081A	BHC-beta	5.8	0.1	ug/L
EPA 8081A	BHC-delta	4.6	0.1	ug/L
EPA 8081A	BHC-gamma (Lindane)	3.6	0.1	ug/L
EPA 8081A	Chlordane	BDL	0.5	ug/L
EPA 8081A	4,4'-DDD	BDL	0.2	ug/L
EPA 8081A	4,4'-DDE	BDL	0.2	ug/L
EPA 8081A	4,4'-DDT	7.8	0.2	ug/L
EPA 8081A	Dieldrin	BDL	0.1	ug/L
EPA 8081A	Endosulfan I	BDL	0.5	ug/L
EPA 8081A	Endosulfan II	BDL	0.5	ug/L
EPA 8081A	Endosulfan sulfate	BDL	0.5	ug/L
EPA 8081A	Endrin	12.0	0.2	ug/L
EPA 8081A	Endrin aldehyde	BDL	0.2	ug/L
EPA 8081A	Heptachlor	BDL	0.1	ug/L
EPA 8081A	Heptachlor epoxide	BDL	0.1	ug/L
EPA 8081A	Methoxychlor	BDL	0.3	ug/L
EPA 8081A	Toxaphene	184	5.0	ug/L
Chlorinated Herbicides				
EPA 8151A	2,4-D	BDL	5.0	ug/L
EPA 8151A	2,4-DB	BDL	0.91	ug/L
EPA 8151A	2,4,5-T	BDL	0.20	ug/L
EPA 8151A	2,4,5-TP (Silvex)	BDL	10	ug/L
EPA 8151A	Dalapon	BDL	5.8	ug/L
EPA 8151A	Dicamba	BDL	0.80	ug/L
EPA 8151A	Dichloroprop	BDL	0.65	ug/L
EPA 8151A	Dinoseb	BDL	3.9	ug/L
EPA 8151A	MCPA	BDL	250	ug/L
EPA 8151A	MCPP	BDL	190	ug/L



ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Report Number **166978**

Project: Red Panther, Project#37778-010-1008

Prepared For:

URS - Atlanta
235 Peachtree Street, N.E.
North Tower, Suite 2000
Atlanta, GA 30303

Attention: Mr. Brent Jacobs

November 22, 2002

P.O. No. 37778-010-1008

We appreciate the opportunity to provide the analytical support for your project. The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Project Manager

Quality Assurance



ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Definitions of Terms

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- CFU** - Colony Forming Units

NOTE: Unless otherwise noted, all results are reported on an as received basis.



ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis

110 Technology Parkway Norcross, GA 30092

(770) 734-4200 FAX (770) 734-4201

Laboratory Report

URS - Atlanta
235 Peachtree Street, N.E.
North Tower, Suite 2000
Atlanta, GA 30303

Attention: Mr. Brent Jacobs

Report No. 166978-1

November 22, 2002

Sample Description

URS - Atlanta

Wastewater, Grab, Red Panther, Project#37778-010-1008, Ditch Water, 11/20/2002, 14:55, received 11/21/2002

Analytical Method	Analyte	Result	Detection Limit	Units
Metals				
EPA 6010B	Total Arsenic (As)	3.6	0.03	mg/L
Pesticides				
EPA 8081A	Toxaphene	BDL	2.0	ug/L
EPA 8081A	Dieldrin	1.2	0.1	ug/L

FILE COPY

June 19, 1964

Mr. Cliff Porterfield
Red Feather Chemical Company
P. O. Box 325
Clarksdale, Mississippi 38614

Dear Mr. Porterfield:

Re: NPDES Permit No. MS0000763
Clarksdale, Mississippi
Cotton County

The following comments are a result of my May 23, 1964 inspection:

1. The drum storage area must be diked. This is the second time I have seen a green solution in a small ditch that leaves the property.
2. The dikes around your facility need to be closely inspected and any problems areas corrected. In one area of the dike I saw a small rubber stopper plugging up the drain pipe. A valve should be installed in its place or the drain pipe sealed up. In another area of the dike I saw a dike drain that was not capped.
3. I saw seepage on the outside wall of your north dike. Please find the source and correct it.
4. An evaluation should be made of the area where you unload rail cars. There could be serious environmental problems if a spill occurred.

Please reply, in writing, within 15 days after receipt of this letter to the above comments. Your State Operating Permit will be issued as soon as (1) your existing dikes have been properly inspected, and (2) your drum storage area diked.

Should you have any questions, please do not hesitate to call us at 981-3171.

Sincerely,

Walter Huff
Industrial Wastewater Control Section

Wich

FILE COPY

February 5, 1984

Mr. Cliff Porterfield
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 38514

Dear Mr. Porterfield:

Enclosed is an application for a State Operating Permit. Please complete the form and return it to the Bureau by March 1, 1984.

Should you have any questions, please do not hesitate to call me at 661-5177.

Sincerely,

Walter Huff
Industrial Wastewater Control Section

WHL
Enclosure

FILE COPY

January 19, 1984

Mr. Cliff Porterfield
Red Panther Chemical Company
P. O. Box 126
Clarksdale, Mississippi 38619

Dear Mr. Porterfield:

Re: NPDES Permit No. MS0000788
Clarksdale, Mississippi
Coshona County

As discussed with your consulting engineer on the telephone, your NPDES application will be due on February 17, 1984, at the latest if you decide to continue discharging your cooling water.

If you decide to recirculate your cooling water, please let us know so that we can issue you a "No Discharge Permit."

If you have any questions, please do not hesitate to call us at 601/661-5171.

Very truly yours,

Walter Huff
Industrial Wastewater Control Section

Wjh:adb

W.H.



RED PANTHER CHEMICAL COMPANY/P.O. BOX 550/CLARKSDALE, MS 38614 PH. (601) 627-4731

January 4, 1984

RECEIVED
JAN 6 1984
DEPT. OF NATURAL RESOURCES
BUREAU OF POLLUTION CONTROL

Mr. Walter Huff
Mississippi Department of Natural Resources
Bureau of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39209

Dear Mr. Huff:

Re: NPDES Permit No. MS0030783
Clarksdale, Mississippi
Coahoma County

This is in reference to your letter of December 20, 1983, concerning your December 3, 1983 inspection.

In your letter you requested a response to the following:

- 1. Your inspection found pipes through the dikes on the north end of the property had no caps.

Caps or valves have been installed at these points to prevent a liquid escape in the event of a spill.

- 2. You said that you saw a 4 inch PVC line discharging a white substance near the docks on the northwest side of the property.

The PVC Pipe you mentioned is a line fed by drain pipes carrying rain water from the top of the liquid building. The white material in question was from a bag of Hi-Sil broken by a fork lift in the general vicinity of this drain. Hi-Sil is an inert clay used in dust manufacturing. Hi-Sil has an exempt status and would create no hazard in the sewer system.

- 3. Red material floating downstream of the weir near the mouth of the culvert proved to be hydraulic fluid. A city garbage dumpster had a hydraulic line burst a few feet from the ditch and spilled approximately 1 gallon of fluid. The city workers spread absorbent clay granules over the area and removed some soil, however, some contamination still existed. This area has been excavated to clean ground.
- 4. In the storage area on the property you observed green-tinted water. This was caused by an overflow of a rim on an empty methyl parathion drum. This area was decontaminated with soda ash. To prevent re-occurrence, empty drums are placed on the side.



RED PANTHER CHEMICAL COMPANY/P.O. BOX 550/CLARKSDALE, MS 38614 PH. (601) 627-4731

Mr. Walter Huff
January 4, 1984
Page -2-

We appreciate your interest in our behalf and assure you of our continued cooperation.

Very truly yours,

A handwritten signature in cursive script that reads "Clifford D. Porterfield". The signature is written in black ink and is positioned above the printed name.

CLIFFORD D. PORTERFIELD
Director of Sales & Technical Service

FILE COPY

December 20, 1983

Mr. Cliff Porterfield
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 38614

Dear Mr. Porterfield:

Re: NPDES Permit No. MS0030783
Clarksdale, Mississippi
Coahoma County

The following comments are a result of my December 3, 1983 inspection.

1. Your dikes need to be inspected thoroughly. The dikes on the north end of your property had 3/4 inch pipes through the dikes which were not capped. In the event of a spill, all liquid material would escape. Caps should be placed on these pipes and opened only after the manager has inspected the water for contamination.
2. On the northwest side of your property near the docks, I saw a 4-inch PVC line which had been discharging a white substance. Some of the material was going into a city storm sewer. Please identify the white substance and cease discharging this wastewater to the city sewer.
3. Approximately 10 feet downstream of the weir near the mouth of a culvert, I saw a red material floating on top of the water. Please identify this substance.
4. Please inform me what the green-tinted wastewater was I saw running off of your property.

Red Panther Chemical Company needs to have better control of contaminated water running off of your property.

Within 10 days after receipt of this letter, please inform me what Red Panther Chemical plans to do about their dikes, and what action you will take in the future to assure that contaminated water does not escape your property. The Bureau will conduct a follow-up inspection in the near future to see if all of the above problems have been corrected.

Should you have any questions, please do not hesitate to call me at (601)961-5171.

Sincerely,

Walter Huff
Industrial Wastewater Control Section

WR:hdb

FILE COPY

August 12, 1983

Mr. Charles Brown
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 38614

Dear Mr. Brown:

Re: NPDES Permit No. MS0010783
Clarksdale, Mississippi
Coahoma County

A review of our files indicates that Red Panther Chemical Company is delinquent in submitting self-monitoring reporting forms for process wastewater discharge for the period of April through June. These forms were due no later than July 23, 1983. It is necessary that these forms be submitted within ten (10) days following receipt of this letter. Please submit justification for noncompliance if the report cannot be submitted and state, if possible, when compliance will be achieved.

The next report covers the period July through September, and is due by October 23, 1983.

If you have any questions or if we can be of any service, please advise.

Very truly yours,

Walter Huff
Industrial Wastewater Control Section

WJ:als

June 16, 1983

FILE COPY

Mr. Charles Brown
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 38614

Dear Mr. Brown:

Re: NPDES Permit No. MS0030783
Clarksdale, Mississippi
Coahoma County

As you may be aware, the referenced permit for Red Panther Chemical Company expires June 30, 1984. Since your last application, the Environmental Protection Agency has initiated the Consolidated Permits Program which altered the format by which industrial wastewater discharges apply for permit reissuance.

Enclosed are Forms 1 and 2C which must be completed in duplicate and returned to this office before we can begin processing your application. Form 1 asks for general information and is relatively simple to complete. Form 2C requires thorough review of the instructions prior to providing the requested data.

In order for our office to have adequate time to process your application and renew your permit prior to the present expiration, we require these forms be completed and returned to us by January 2, 1984.

Should any questions surface as you review and complete the application forms, do not hesitate to contact us.

Sincerely,

Walter Huff
Industrial Wastewater Control Section

WE:hdb
Enclosures

February 15, 1983

Mr. Charles E. Brown
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 38614

Dear Mr. Brown:

Re: NPDES Permit No. MS0030733
Clarksdale, Mississippi
Coshoma County

A review of our files indicates that Red Panther Chemical Company is delinquent in submitting self-monitoring reporting forms for process wastewater discharge for the period of October through December. These forms were due no later than January 28, 1983. It is necessary that these forms be submitted within ten (10) days following receipt of this letter. Please submit justification for non-compliance if the report cannot be submitted and state, if possible, when compliance will be achieved.

The next report covers the period January through March, and is due by April 28, 1983.

If you have any questions or if we can be of any service, please advise.

Very truly yours,

Walter Huff
Industrial Wastewater Control Section

W:als

FILE COPY

November 13, 1982

Mr. Charles E. Brown
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 38614

Dear Mr. Brown:

Re: NPDES Permit No. MS0030763
Clarksdale, Mississippi
Coahoma County

A review of our files indicates that Red Panther Chemical Company is delinquent in submitting self-monitoring reporting forms for process wastewater discharge for the period of July through September. These forms were due no later than October 29, 1982. It is necessary that these forms be submitted within ten (10) days following receipt of this letter. Please submit justification for noncompliance if the report cannot be submitted and state, if possible, when compliance will be achieved.

The next report covers the period October through December, and is due by January 23, 1983.

If you have any questions or if we can be of any service, please advise.

Very truly yours,

Walter Huff
Industrial Wastewater Control Section

WH:els

October 1, 1980

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles E. Brown, General Manager
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 38614

Dear Mr. Brown:

Re: NPDES Permit No. MS0030783

Enclosed is National Pollutant Discharge Elimination System (NPDES) Permit Number MS0030783, which is hereby issued to Red Panther Chemical Company. Please note the effluent limitations, schedule of compliance, monitoring requirements, and monitoring reporting dates in Part I of the permit.

This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Sections 49-17-1, et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted to the Mississippi Pollution Control Permit Board pursuant to Section 402(b) of the Federal Water Pollution Control Act.

If you desire that a Permit Board hearing be held regarding this permit, you must make written application to the Permit Board within thirty (30) days after receipt of this notice; otherwise, the terms, conditions and limitations in the permit shall become final.

If you have any questions, please contact us.

Very truly yours,

J. Wesley Griffith, Jr.
Industrial Wastewater Control Section

JWGjr:bdb
Enclosures

cc: Mr. Bill Cloward, EPA (w/copy of permit)
Mr. Carl Chaplin

FILE COPY

September 22, 1980

Mr. Charles E. Brown, General Manager
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 33614

Dear Mr. Brown:

Re: NPDES Permit No. MS0030783

Enclosed is a copy of the analytical laboratory results on samples taken at Red Panther Chemical Company on September 9, 1980. These results indicate that the referenced permittee is in compliance with the effluent limitations of the NPDES permit.

If you have any questions or if we can be of further assistance, please advise.

Very truly yours,

J. Wesley Griffith, Jr.
Industrial Wastewater Control Section

JWG:els
Enclosures

FILE COPY

August 28, 1980

Mr. Bill Cloward, Chief
Permits Section, Enforcement Division
Environmental Protection Agency
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Dear Mr. Cloward:

During the last two years, the State of Mississippi has spent a significant amount of time in the second-round issuance process, preparing permits with short-term expiration dates. Many of these permits have either once again expired or are approaching that date within a few months and consist only of cooling water, boiler blowdown, sanitary waste, or other non-process related wastewater, for which no BAT regulations are being contemplated. We do not desire to reissue the permits a third time for short-term duration, as this results in unnecessary administrative paperwork, with no new guidance or regulations to look forward to in the interim. Therefore, it is incumbent upon this agency, as the NPDES authority in Mississippi, to apply its judgement as to what constitutes BAT levels for these types of wastes.

Enclosed is a copy of the following applications and draft permits:

<u>Permittee</u>	<u>Location</u>	<u>Permit No.</u>
Georgia-Pacific Corporation	Columbia	MS0002208
Georgia-Pacific Corporation	Gloster	MS0000655
Georgia-Pacific Corporation	Louisville	MS0002186
Georgia-Pacific Corporation	Taylorville	MS0035343
Georgia-Pacific Corporation	Taylorville	MS0002194
Georgia-Pacific Corporation	Bay Springs	MS0022136
Memphis Hardwood Flooring	Bruce	MS0000868
Memphis Hardwood Flooring	Grenada	MS0001155
Memphis Hardwood Flooring	Potts Camp	MS0001163
MFC Services	Clarksdale	<u>MS0030783</u>
Grief Brothers	Durant	MS0000531
Weyerhaeuser	Philadelphia	MS0001961
Ram Golf	Pontotoc	MS0031721
Cooper Steel	Greenville	MS0035858

Only the pages of the permit which contain changes or modifications are included in this submittal.

Mr. Bill Cloward, EPA
August 28, 1980
Page -2-

As allowed under 40 CFR 122.64(a)(1)(iii), we are proposing to reissue or modify these permits with long-term expiration dates not to exceed five (5) years. It is our staff's best engineering judgement that the effluent limits incorporated into these permits meet the requirements of Sections 301(b)(2)(A), (C), (D), (E), and (F) of the Clean Water Act. The reopener clause required by 40 CFR 122.62(c) will be included in each of these permits.

If you have any questions or comments regarding any of these permits, please contact us within ten (10) days.

Sincerely,

Bill Barnett, P. E., Coordinator
Industrial Wastewater Control Section

BB:hdb
Enclosures

cc: Nell Keever, EPA

August 26, 1980

FILE COPY

Plant Manager
MFC Service, Inc.
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Sir:

Re: NPDES Permit No. MS0030783

Shortly, the Mississippi Pollution Control Permit Board intends to issue to the above facility a National Pollutant Discharge Elimination System (NPDES) Permit, which when issued will replace all previously issued wastewater permits. The enclosed Public Notice and draft permit contains conditions which we intend to incorporate as part of your final permit.

Please note the effluent limitations, schedule of compliance, monitoring requirements, and monitoring reporting dates in Part I of the draft permit. Also note that the Public Notice is dated August 29, 1980, which is the beginning of a 30-day public comment period. Permit limits will be finalized at the end of this period.

If you have any comments concerning the proposed permit conditions, please notify this office in writing prior to September 29, 1980.

Should you have any questions or wish to discuss the enclosed documents, please contact me at 601/354-2550.

Very truly yours,

J. Wesley Griffith, Jr.
Industrial Wastewater Control Section

JWG:ls

Attachments

cc: Mr. Bill Cloward, EPA (w/attachments)



MFC SERVICES (AAL)/BOX 500/HWY. 51 N/MADISON, MS 39110/PH. (601) 856-2400
TELEX 58-5410/TWX 810-990-1956

August 21, 1980

EXECUTIVE OFFICERS

J. L. HARPOLE
president
and general manager

R. A. FILGO
senior vice president
and treasurer

JOHN A. GASTON
assistant treasurer

EVA SISTRUNK
assistant secretary

BOARD OF DIRECTORS

WILLIAM M. WHITE
chairman

ETHAN PORTER
vice chairman

H. CLYDE CLARK
secretary

RAY BASS
DR. WILLIAM M. BOST

CLAUDE HYDE
JAMES A. McDANIEL

W. S. PEARCE
A. B. STEVENS, JR.
D. R. YANDELL

BARNEY H. JACKS
commercial bank advisor

Red Panther
Mr. J. Wesley Griffith, Jr.
Industrial Waste Water Control
Section
Mississippi Department of Natural
Resources
Bureau of Pollution Control
Post Office Box 10385
Jackson, Mississippi 39209

Re: NPDES Permit No. MS0030783

Dear Mr. Griffith:

I have reviewed the proposed draft of Permit No. MS0030783. I generally have no objection to the form or content of the proposed permit. I do, however, believe that it would be best to remove any reference to MFC Services from the permit.

MFC is currently the largest single stockholder in Red Panther Chemical Company. However, MFC is not Red Panther's only stockholder and Red Panther cannot be considered a subsidiary of MFC. Since Red Panther is a completely separate business entity I believe that any reference to MFC should be deleted.

Thank you for your attention to this matter.

Sincerely,

Samuel T. Polk, III

Samuel T. Polk, III
Attorney

STP:III:ej

Copy to
Mr. Charlie Brown
Red Panther Chemical Company

AUG 25 1980
MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
BUREAU OF POLLUTION CONTROL

FILE COPY

August 12, 1980

Mr. Bill Cloward
Water Enforcement Division
Permits Section
Environmental Protection Agency
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Attention: Ms. Nell Keever

Dear Mr. Cloward:

Enclosed herewith for your review is a copy of proposed NPDES permit requirements for the following permit applications:

<u>Applicant</u>	<u>Location</u>	<u>Application No.</u>
MFC Services	Clarksdale, MS	MS0030783
Red Panther Chemical Co.	Coahoma County	

Also, enclosed are two (2) copies of the NPDES application.

We would like to receive any comments you have regarding the information transmitted herewith within fifteen (15) working days after receipt.

Yours very truly,

J. Wesley Griffith, Jr.
Industrial Wastewater Control Section

JWG:ls

Enclosures

FILE COPY

August 12, 1980

Mr. Charles E. Brown
General Manager
Red Panther Chemical Company
P. O. Box 326
Clarksdale, Mississippi 38614

Dear Mr. Brown:

Re: NPDES Permit No. MS0030783

Shortly, the Mississippi Pollution Control Permit Board intends to issue to the above facility a National Pollutant Discharge Elimination System (NPDES) Permit. The enclosed Public Notice and draft permit contains conditions which we intend to incorporate as part of your final permit.

Please note the effluent limitations, schedule of compliance, monitoring requirements, and monitoring reporting dates in Part I of the permit.

If you have any comments concerning the information transmitted herewith, please notify this office in writing by August 25, 1980.

Very truly yours,

J. Wesley Griffith, Jr.
Industrial Wastewater Control Section

JWG:ls
Enclosures

cc: Mr. Samuel T. Polk, III



MFC SERVICES (AAL)/BOX 500/HWY. 51 N/MADISON, MS 39110/PH. (601) 856-2400
TELEX 58-5410/TWX 810-990-1956

July 31, 1980

EXECUTIVE OFFICERS

J. L. HARPOLE
president
and general manager

R. A. FILGO
senior vice president
and treasurer

JOHN A. GASTON
assistant treasurer

EVA SISTRUNK
assistant secretary

BOARD OF DIRECTORS

WILLIAM M. WHITE
chairman

ETHAN PORTER
vice chairman

H. CLYDE CLARK
secretary

RAY BASS
DR. WILLIAM M. BOST

CLAUDE HYDE
JAMES A. McDANIEL

W. S. PEARCE
A. B. STEVENS, JR.

D. R. YANDELL

BARNEY H. JACKS
commercial bank advisor

Mr. Bruce Mowry, PE
Industrial Waste Water
Control Section
Mississippi Department of
Natural Resources
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209

Re: NPDES Permit No. MS 0030783

Dear Mr. Mowry:

Please find attached hereto National Pollutant Discharge Elimination System Application for Permit to Discharge - Short Form C. This form was sent to me by Mr. Charles E. Brown, General Manager of Red Panther Chemical Company in Clarksdale, Mississippi. I have reviewed the application form together with the applicable instructions for the completion thereof. It appears that the form has been properly completed.

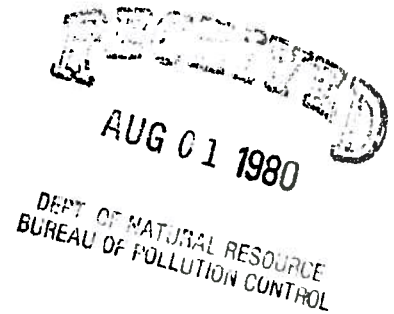
Please direct all correspondence regarding this application to Mr. Brown. I would be appreciative if you would be so kind as to copy me on all such correspondence.

Sincerely,

Samuel T. Polk, III
Attorney

STP:III:ej

CC: Mr. Charles E. Brown
P. O. Box 326
Clarksdale, MS 38614



FILE COPY

July 7, 1980

Plant Manager
MFC Services, Inc.
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Sir:

Re: NPDES Permit No. MS0030783

The Federal Water Pollution Control Act Amendments of 1972 require that anyone discharging wastewater must obtain a National Pollutant Discharge Elimination System (NPDES) Permit. The Act further requires that an NPDES permit application be completed before an NPDES permit can be obtained. The State permit which you now have will not suffice as an NPDES permit nor will it serve as an NPDES application.

The State of Mississippi has obtained authorization to issue NPDES permits and conduct the NPDES Permit Program in Mississippi. Therefore, please complete the enclosed NPDES application to the best of your knowledge, then submit the signed application to the Permit Board.

No filing fee is required by the Permit Board. Therefore, disregard any statements in the instructions pertaining to filing fees.

If you have any questions, please contact me.

Yours very truly,

Bruce Mowry, P. E.
Industrial Wastewater Control Section

BM:ls
Enclosures

Air & Water Pollution Control Commission

STATE OF MISSISSIPPI



MEMORANDUM

TO: Bill Barnett

FROM: Connie Simmons

SUBJECT: Riverside Chemical Company, Clarksdale, Mississippi
Coahoma County

DATE: December 4, 1978

Riverside Chemical Company's plant in Clarksdale was purchased by MFC Services (see attachment). The NPDES permit under Riverside expires on September 30, 1980. Please change your files accordingly.

The plant's air permit has expired. A new application ^{with more} ~~of~~ specific information is being requested.

CS:ls

Attachment

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

CERTIFIED MAIL

Mr. John Duff
Riverside Chemical
P. O. Box 55
Clarksdale,

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one). <input checked="" type="checkbox"/> Show to whom and date delivered..... 15¢ <input type="checkbox"/> Show to whom, date, & address of delivery.. 35¢ <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom and date delivered..... 65¢ <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery 85¢	2. ARTICLE ADDRESSED TO: 56 Riverside Chemical Clarksdale, Ms. LWM 2-2-76
3. ARTICLE DESCRIPTION: REGISTERED NO. 688929 INSURED NO.	(Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent [Signature]
4. DATE OF DELIVERY	POSTMARK MS FEB 9 1976 CLARKSDALE, MS CLARKS INITIALS
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	

PS Form 3811, Jan. 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO : 1975-O-568-047

Dear Mr. Duff:

Re: NPDES Permit No. MS0030783
Riverside Chemical Company
Clarksdale, Mississippi

Enclosed is National Pollutant Discharge Elimination System (NPDES) Permit Number MS0030783, which is hereby issued to the Riverside Chemical Company. This permit replaces State Temporary Permit No. 000070 issued on June 3, 1971. Please note the effluent limitations, schedule of compliance, monitoring requirements, and monitoring reporting dates in Part I of the permit.

This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Sections 49-17-1, et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted to the Mississippi Air and Water Pollution Control Commission pursuant to Section 402(b) of the Federal Water Pollution Control Act.

If Riverside Chemical Company desires that a Commission hearing be held regarding this permit, it should make written application to the Commission's Permit Board within thirty (30) days after receipt of this notice; otherwise, the terms, conditions and limitations in the permit shall become final.

If you have any questions, please contact us.

Very truly yours,

Larry W. Moore
Industrial Wastewater Section

LWM:ps
Enclosure

cc: Mr. Paul J. Traina (w/copy of permit)
North Regional Office

*Riverside
Chemical
Company*

Air & Water Pollution Control Commission

STATE OF MISSISSIPPI

COMMISSIONERS

Ray Tribble
Chairman
Money

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Vice Chairman
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Board of Health
Joe D. Brown

Marine Conservation
Commission
W. J. Demoran

Charles W. Else
Yazoo City

Game & Fish Commission
Barry O. Freeman

W. E. Gupton
Jackson



Glen Wood, Jr., Executive Director
P. O. Box 827 - Robert E. Lee Building
Jackson, Mississippi 39205

Telephones:

Administrative Offices 601-354-7513
Air Division 601-354-6783
Water Division 601-354-7661

COMMISSIONERS

Oil & Gas Board
Quincy R. Hodges

Hermit A. Jones
Canton

Board of Water
Commissioners
Jack Pepper

ASSOCIATE MEMBERS

State Park System
Dr. John M. King

A & I Board
Paul Burt

Geological Survey
W. H. Moore

December 31, 1975

Postmaster
United States Post Office
Clarksdale, Mississippi 38614

Dear Sir:

In order to satisfy our legal requirements for public notice of proposed issuance of NPDES permits, please post the enclosed Public Notice in a location where it will be readily accessible to public view.

Your assistance is appreciated.

Very truly yours,

Larry Moore
Wastewater Facilities Section

LM:gkt
Enclosure

FILE COPY

December 22, 1975

Mr. John Duff, Regional Manager
Riverside Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Duff:

Re: NPDES Draft Permit No. MS0030783
Riverside Chemical Company
Clarksdale, Mississippi

Attached for your information is a copy of the Public Notice and Draft Permit pertaining to your application for a National Pollutant Discharge Elimination System (NPDES) permit. Please note that the Public Notice is dated December 31, 1975, which begins a 30-day public comment period prior to the formulation of final parameter limitations.

By way of previous correspondence, your facility was given an opportunity to comment on proposed permit conditions. Should you have any questions or wish to discuss the documents included with this transmittal, please contact me at 601/354-7661.

Very truly yours,

Larry W. Moore
Industrial Wastewater Section

LWM:ps
Attachments

cc: Mr. Paul J. Traina (w/attachments)

C
O
P
Y

THE COPY

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

CERTIFIED MAIL

Mr. John Du
Riverside C
P. O. Box 5
Clarksdale,

Dear Mr. Du:

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one). <input checked="" type="checkbox"/> Show to whom and date delivered..... 15¢ <input type="checkbox"/> Show to whom, date, & address of delivery.. 35¢ <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered..... 65¢ <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢	2. ARTICLE ADDRESSED TO: <i>9 qt</i> <i>Mr. John Duff, Reg. Mgr.</i> <i>Riverside Chemical Co.</i> <i>Clarksdale, Ms.</i>
3. ARTICLE DESCRIPTION: REGISTERED NO. <i>121732</i> CERTIFIED NO. _____ INSURED NO. _____	(Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent
4. DATE OF DELIVERY <i>Kenny Patton</i> <i>CLARKSDALE, MS</i> <i>OCT 16 1975</i>	5. ADDRESS (Complete only if requested) 6. UNABLE TO DELIVER BECAUSE:

PS Form 3811, Jan. 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO: 1975-O-566-047

Riverside Chemical Company
Clarksdale, Mississippi

The Mississippi Air and Water Pollution Control Commission intends to issue, to the above facility in the near future, a National Pollutant Discharge Elimination System (NPDES) Permit. The enclosed Public Notice and draft permit exhibit conditions which we intend to incorporate as part of your final permit.

Please note the effluent limitations, schedule of compliance, monitoring requirements, and monitoring reporting dates in Part I of the permit.

If you have any comments concerning the information transmitted herewith, please notify this office in writing by November 3, 1975.

Very truly yours,

Larry W. Moore
Industrial Wastewater Section

LWM:ps
Enclosures

FILE COPY

September 5, 1975

Mr. John Duff
Riverside Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Duff:

Enclosed is a copy of the analytical laboratory results on samples taken at Riverside Chemical Company, Clarksdale, Mississippi, on August 20, 1975.

If you have any questions or if I can be of further assistance, please advise.

Sincerely,

Larry W. Moore
Industrial Wastewater Section

LWM:bw
Enclosures

FILE COPY

September 4, 1975

Mr. John Duff
Riverside Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Duff:

As you requested, I have enclosed a copy of the report of our investigation of Riverside Chemical Company on August 26, 1975.

Thanks again for the cooperation afforded us on our inspection.

Very truly yours,

Larry W. Moore
Industrial Wastewater Section

LWM:bw
Enclosures

FILE COPY

July 24, 1975

Mr. John Duff
Riverside Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Duff:

Acknowledgement is made of receipt of your Application dated June 24, 1975, for a National Pollutant Discharge Elimination System (NPDES) Permit to authorize discharge of effluent into surface waters.

Your application has been assigned NPDES Number MS0030783. This application fulfills your current statutory obligations for the subject facility, if it contains all of the required information and the information is accurate. Your application will be reviewed and a discharge permit issued in accordance with Commission priorities; therefore, processing of your application may not be immediately forthcoming. In the event additional information or clarification is required, you will be advised.

Should you have any questions regarding the above or wish to discuss the procedures we intend to follow, please feel free to call me at 601/354-7661.

Very truly yours,

Stephen Nick
Wastewater Facilities Section

SN:bw

FILE COPY

Jerzy Banks, North Regional Office

Larry Moore

Riverside Chemical Company, Clarksdale, Mississippi

July 17, 1975

Please sample the cooling water discharge from the referenced facility in accordance with the enclosed sample request form. The sample for pesticide analysis should be placed in a glass container with teflon liner. The container should be rinsed with pesticide grade acetone and hexane. The container should then be sealed with hexane, rinsed aluminum foil under the cap and refrigerated as soon as possible after collection.

Respectfully submitted,

**Larry W. Moore
Wastewater Facilities Section**

LWM:lb

Enclosure

cc: Mr. Tommy Gingles

FILE COPY

July 17, 1975

**Mr. John Duff, Regional Manager
Riverside Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614**

Dear Mr. Duff:

Reference is made to our telephone conversation of July 15, 1975. I have enclosed NPDES permit application - Short Form C which should be completed and returned to the Commission as soon as possible. Upon receipt of the application, I shall proceed in developing the NPDES permit for your facility.

If you have any questions, please contact me.

Very truly yours,

**Larry W. Moore
Wastewater Facilities Section**

LWM:lb

Enclosures

FEATHER

Air & Water Pollution Control Commission

STATE OF MISSISSIPPI

COMMISSIONERS

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CHAIRMAN
MONEY

JAMES W. CARRAWAY
VICE CHAIRMAN
BASSFIELD

BOARD OF HEALTH
JOE D. BROWN

KENNETH COBB
LAMBERT

CHARLES W. ELSE
YAZOO CITY

GAME & FISH COMMISSION
BARRY O. FREEMAN

OIL & GAS BOARD
QUINCY R. HODGES

HERMIT A. JONES
CANTON



GLEN WOOD, JR., EXECUTIVE DIRECTOR
P. O. BOX 827 - ROBERT E. LEE BUILDING
JACKSON, MISSISSIPPI 39205

TELEPHONES:
ADMINISTRATIVE OFFICES 601-354-7513
AIR DIVISION 601-354-6783
WATER DIVISION 601-354-7661

COMMISSIONERS

MARINE CONSERVATION
COMMISSION
CHARLES H. LYLES

BOARD OF WATER
COMMISSIONERS
JACK PEPPER

JOE STONE
HATTIESBURG

ASSOCIATE MEMBERS

STATE PARK SYSTEM
WILLIAM M. BARNETT

A & I BOARD
HAROLD A. CROSS

GEOLOGICAL SURVEY
W. H. MOORE

TO: Ron Feather
FROM: Othel Anding
DATE: July 11, 1975

SUBJECT: Riverside Chemical Company
Clarksdale, Mississippi

On July 10, 1975, I made an inspection of the referenced project. Attached is an inspection sheet.

The company has a discharge of water from boilers and air compressors used in their process. Their discharge is approximately 30 gallons per hour. This water is only cooling water and does not come in contact with any formulating materials. But since this is cooling water, it may have to be permitted.

Just thought you might like to know.

Respectfully submitted,

Othel Anding
Othel Anding

OA:br

RECEIVED
JUL 18 1975
AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

FILE COPY

May 23, 1975

Mr. John Duff, Regional Manager
Riverside Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Duff:

Re: NPDES Application Request

The Federal Water Pollution Control Act Amendments of 1972 require that anyone discharging wastewater must obtain a National Pollutant Discharge Elimination System (NPDES) Permit. The Act further requires that an NPDES permit application be completed before an NPDES permit can be obtained. The State permit which you now have will not suffice as an NPDES permit nor will it serve as an NPDES application.

The State of Mississippi has obtained authorization to issue NPDES permits and conduct the NPDES Permit Program in Mississippi. Therefore, please complete the enclosed NPDES application in triplicate to the best of your knowledge, then submit the applications with your signature to the Commission.

No filing fee is required by the Commission. Therefore, disregard any statements in the instructions pertaining to filing fees.

If you have any questions, please contact Mr. Stephen Nick of our staff.

Yours very truly,

Glen Wood, Jr.
Executive Director

GWjr:HFG:lb
Enclosures

August 20, 1974

Mr. Robert Harnden
Riverside Chemical Company
Post Office Box 550
Clarksdale, Ms 38614

Dear Mr. Harnden:

Acknowledgement is made of receipt of your application dated August 9, 1974. Since you discharge your wastewater into the City Sewer System, you are not required to obtain an NPDES permit. Thank you for your cooperation in this matter.

Very truly yours

Stephen Nick
Pollution Control Technologist

SN:bc



August 9, 1974

RECEIVED

AUG 10 1974
AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

Mr. Daniel Averett
Air & Water Pollution Control Commission
State of Mississippi
P. O. Box 827
Jackson, Mississippi 39205

Dear Mr. Averett:

We are responding to the letter of July 24 sent by Mr. Glen Wood, Jr. to Coahoma Chemical Company at Clarksdale, Mississippi. The assets of Coahoma Chemical Company were purchased by Riverside Chemical Company so that the facility for which the NPDES Application is to be made is owned by Riverside Chemical Company.

Attached you will find three copies of the NPDES Application for Permit to Discharge - Short Form C which we have filled out, and which we hope are completed to your satisfaction. If there is any question concerning any of the items on the form, please contact me.

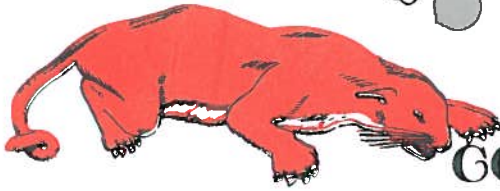
Yours very truly,

RIVERSIDE CHEMICAL COMPANY

Robert C. Harnden
Vice President

RCH:ma

cc: Mr. John Duff



GOAHOMA *Chemical* COMPANY, INC.

MAIN PLANT AND OFFICE: PHONE 601 624-8381 P. O. BOX 550 CLARKSDALE, MISS. 38614

May 21, 1971

Mr. David Hagerman
Air & Water Pollution Control Commission
State of Mississippi
P. O. Box 827
Jackson, Miss. 39205

Dear Mr. Hagerman:

We sure appreciate your May 20 letter and we have to the best of our ability properly filled in MPC Form 1-68.

We have, also, attached a Xerox copy of our May 11 letter addressed to you.

Frankly, the only thing that worries us now is time, and rest assured that as of July 1, there will be no waste waters going into any ditch. Also, after July 1, we shall try to expedite our final waste control procedures as promptly as possible.

We shall look forward to receiving our permit.

Sincerely yours,

GOAHOMA CHEMICAL COMPANY, INC.


O. James Faloon
President

OJF/ak

Enclosures

RECEIVED

MAY 24 1971

AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

RED PANTHER PRODUCTS

May 11, 1971

Air & Water Pollution Control Commission
State of Mississippi
416 North State Street
P. O. Box 827
Jackson, Miss. 39205

Attn: Mr. David Hagerman

Gentlemen:

Since speaking with you the other day we have been doing some serious thinking and believe that we have arrived at least at a tentative decision as to what to do in order to comply with the State Regulation WPC-3-70 and the federal Executive Order #11574.

First of all, in the disposition of what I call dry refuse we have no problems other than fibre metal top and bottom drums and 5 gallon steel closed head cans. We have no problem with 30 and 55 gallon steel drums because most of our emulsifiers and most of our chemicals are purchased in tank car lots.

Now, in regard to the drum disposal we propose to secure a press to completely flatten the fibre drums and the 5 gallon steel cans and turn them over to the city for disposal as we do now with our paper bags.

The above then takes care of any air pollution by our company in the way of not burning any trash or refuse.

Now, let's get over to the problem of liquid disposition. As mentioned to you the other day it is tentatively estimated that our wash waters which may contain some contaminants is perhaps 200 or not over 300 gallons a day.

Our plan is to run this water into a settling basin and then by pump to a holding tank to be activated carbon treated and if this does not do the job completely we will treat chemically both with an alkali and an acid to throw out any possible solids from any remaining emulsions.

From this holding tank we will then filter if necessary into an evaporating pan erected on a brick foundation and gas heated with a capacity of approximately 1000 gallons or larger if need be. In short, there will be no liquids whatsoever go into a drainage ditch.

We would appreciate your reaction and thoughts as to the above and see whether or not this meets with your approval in not having to have a state or federal permit for disposition of our waste waters.

Page 2.

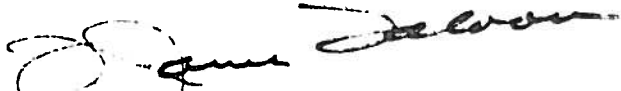
Air & Water Pollution Control Commission
May 11, 1971

One other matter we would like to have an opinion on and that is, we are now entering our busy season and I doubt very much if we could fully comply with this by July 1, 1971. However, if at all possible we would strive for a target date of not later than the end of 1971.

Would appreciate hearing from you.

Very truly yours,

COAHOMA CHEMICAL COMPANY, INC.



O. James Faloon
President

OJF/ak

cc: Mr. A. M. Dean
Department of the Army
Vicksburg District
Corps of Engineers
Vicksburg, Miss. 39180

May 20, 1971

Mr. O. James Faloon, President
Coahoma Chemical Company, Inc.
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Faloon:

Pursuant to our telephone conversation yesterday, I would like to take this opportunity to reply to the proposal in your letter of May 11, 1971, and questions raised in our phone conversation.

First, we concur as a state agency in your approach to the problem. At such time as you have no discharge, neither a state nor Federal permit is required.

Second, the fact that you have a discharge now requires a state permit now.

Third, if you still have a discharge on July 1, 1971, a Federal permit application is required.

Fourth, we will issue a state permit to you as soon as you tell us when the discharge will be eventually stopped and complete the enclosed application.

Fifth, should you find it necessary to apply to the Corps of Engineers for a permit, please send us a copy of Sections I and II and the material described in the enclosed interim procedure.

I hope this will clarify exactly what is needed. Further, if you are going to the evaporative procedure, I suggest that you omit acid, alkali and carbon treatments before evaporation. They will only cost you money and serve little purpose.

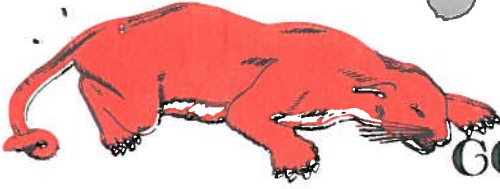
Mr. O. James Faloon
May 20, 1971
Page 2

I discussed this matter with Mr. Dean in Vicksburg shortly
after you talked with him.

Very truly yours,

David T. Hagerman, P. E.
Senior Engineer
Industrial Waste Section

DTH:kh
Enclosures



GOAHOMA *Chemical* **COMPANY, INC.**

MAIN PLANT AND OFFICE: PHONE 601 624-8381 P. O. BOX 550 CLARKSDALE, MISS. 38614

May 11, 1971

RECEIVED

MAY 12 1971

AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

Air & Water Pollution Control Commission
State of Mississippi
416 North State Street
P. O. Box 827
Jackson, Miss. 39205

Attn: Mr. David Hagerman

Gentlemen:

Since speaking with you the other day we have been doing some serious thinking and believe that we have arrived at least at a tentative decision at what to do in order to comply with the State Regulation WPC-3-70 and the federal Executive Order #11574.

First of all, in the disposition of what I call dry refuse we have no problems other than fibre metal top and bottom drums and 5 gallon steel closed head cans. We have no problem with 30 and 55 gallon steel drums because most of our emulsifiers and most of our chemicals are purchased in tank car lots.

Now, in regard to the drum disposal we propose to secure a press to completely flatten the fibre drums and the 5 gallon steel cans and turn them over to the city for disposal as we do now with our paper bags.

The above then takes care of any air pollution by our company in the way of not burning any trash or refuse.

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Our plan is to run this water into a settling basin and then by pump to a holding tank to be activated carbon treated and if this does not do the job completely we will treat chemically both with an alkali and an acid to throw out any possible solids from any remaining emulsions.

From this holding tank we will then filter if necessary into an evaporating pan erected on a brick foundation and gas heated with a capacity of approximately 1000 gallons or larger if need be. In short, there will be no liquids whatsoever go into a drainage ditch.

We would appreciate your reaction and thoughts as to the above and see whether or not this meets with your approval in not having to have a state or federal permit for disposition of our waste waters.

RED PANTHER PRODUCTS

Page 2.
Air & Water Pollution Control Commission
May 11, 1971

One other matter we would like to have an opinion on and that is, we are now entering our busy season and I doubt very much if we could fully comply with this by July 1, 1971. However, if at all possible we would strive for a target date of not later than the end of 1971.

Would appreciate hearing from you.

Very truly yours,

COAHOMA CHEMICAL COMPANY, INC.



O. James Faloon
President

OJF/ak

cc: Mr. A. M. Dean
Department of the Army
Vicksburg District
Corps of Engineers
Vicksburg, Miss. 39180

May 11, 1971

Mr. A. M. Dean
Department of the Army
Vicksburg District
Corps of Engineers
Vicksburg, Miss. 39180

Dear Mr. Dean:

Since speaking with you as well as Mr. Hagerman of the State Pollution Control Commission several days ago, our Chief Chemist and our Engineer and myself have gone through quite a few sleepless nights trying to resolve our problem.

Since a state permit is a prerequisite to a federal permit we thought it best to write directly to Mr. Hagerman and send you a copy of our letter to him.

We would indeed appreciate reaction to our plan as presented to Mr. Hagerman.

Thanking you, we are

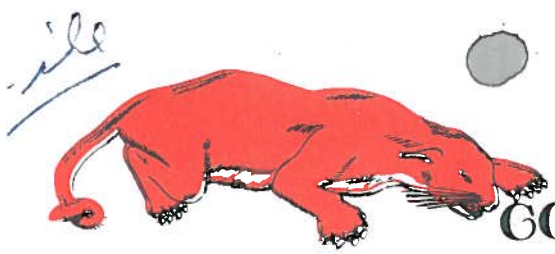
Very truly yours,

COAHOMA CHEMICAL COMPANY, INC.

O. James Faloon
President

OJF/ak

cc: Mr. David Hagerman
Miss. Air & Water Pollution Control Commission
P. O. Box 827
Jackson, Miss. 39205



GOAHOMA *Chemical* COMPANY, INC.

MAIN PLANT AND OFFICE: PHONE 601 624-8381 P. O. BOX 550 CLARKSDALE, MISS. 38614

September 25, 1970

Mr. David T. Hagerman, P. E.
Air & Water Pollution Control Commission
P. O. Box 827
Jackson, Miss. 39205

Dear Mr. Hagerman:

Please pardon the delay in replying to your September 11th letter.

We have filled out the Industrial Survey to the best of our ability and hope you will find it to be satisfactory.

Thanking you, we are

Very truly yours,

GOAHOMA CHEMICAL COMPANY, INC.

[Handwritten signature of O. James Faloon]

O. James Faloon
President

OJF/ak

Enclosure

RECEIVED
SEP 28 1970
AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

RED PANTHER PRODUCTS

September 11, 1970

Mr. O. J. Faloon, President
Coahoma Chemical Company, Inc.
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Faloon:

I am conducting a survey of selected industries in Coahoma County. I would like to request your assistance in filling out the attached questionnaire.

If you have any questions, please feel free to contact me.

Thanking you in advance for your cooperation, I am

Very truly yours,

David T. Hagerman, P. E.
Senior Engineer
Industrial Waste Section

DTH:mh

Enclosure



COAHOMA
COAHOMA

MFC SERVICES (AAL)/BOX 449/414 NORTH ST./JACKSON, MS. 39205/PH.(601)948-7272
TELEX 58-5410/TWX 810 966-2676

June 21, 1978

RECEIVED

JUN 23 1978

AIR & WATER POLLUTION
CONTROL COMMISSION
STATE OF MISSISSIPPI

EXECUTIVE OFFICERS

J. L. HARPOLE
president
and general manager

R. A. FILGO
senior vice president
and treasurer

JOHN A. GASTON
assistant treasurer

EVA SISTRUNK
assistant secretary

BOARD OF DIRECTORS

WILLIAM M. WHITE
chairman

ETHAN PORTER
vice chairman

H. CLYDE CLARK
secretary

RAY BASS

H. L. DAVIS

CLAUDE HYDE

W. S. PEARCE

D. R. YANDELL

A. B. STEVENS, JR.

Mr. Wayne Anderson
Mississippi Air & Water Pollution
Control Commission
Post Office Box 827
Jackson, Mississippi 39205

Dear Mr. Anderson:

I understand from our conversation today that your office should be advised of changes in ownership of facilities with existing permits. As you know, MFC has recently purchased most of Riverside Chemical Company's Mississippi facilities. Many of these facilities had permits when purchased, namely:

	Facility	Permit		Date	
		Number	Type	Issuance	Expiration
/I	LEE - Belden	2399	Air	4/12/77	4/12/80
		2426	Air	4/12/77	4/12/80
XI	MARSHALL - Byhalia	1529	Air	2/9/76	2/9/79
I	COAHOMA - Clarksdale	1117	Air	12/17/74	12/17/77
		MS003783	Water	2/2/76	9/30/80
XI	WASHINGTON - Greenville	1615	Air	4/30/76	4/30/79
/I	QUITMAN - Marks	1663	Air	6/7/76	6/7/79
		1664	Air	6/7/76	6/7/79
		1665	Air	6/7/76	6/7/79
/I	PONTOTOC - Pontotoc	1908	Air	9/17/76	9/17/79
		1909	Air	9/17/76	9/17/79
		1526	Air	2/5/76	2/5/79

I hope the above information is sufficient to enable

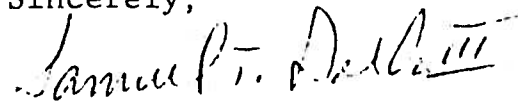
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MFC SERVICES (AAL)

Mr. Wayne Anderson
June 21, 1978
Page 2

you to make necessary file changes. If you need other information please contact me.

Sincerely,



Samuel T. Polk, III
Assistant Attorney

STP/ph

cc: Mr. John Cullinane
Clark, Dietz & Associates
331 Commerce Park Drive
Jackson, MS 39213



INVESTIGATION REPORT

DATE OF INVESTIGATION Aug 26, 1975

NAME OF INDUSTRY OR MUNICIPALITY: Riverside Chemical Co.

City Clarksdale State Miss Zip _____

Persons Participating:

STATE Moore, Garretson, Banks INDUSTRY John Duff

Charlie Brown

EPA Frank Mingledorff

REASON FOR INVESTIGATION:

Routine Permit Violation Permit Citizen Other
limit Schedule Spill Non-Filer Complaint

TYPE OF INDUSTRY: pesticide formulator PRODUCTION RATE: _____

TYPE OF WASTE AND FLOW: cooling water ≈ 1gpm

TYPE OF WASTE TREATMENT: none

WASTE DISCHARGES TO: ann. trib. of Sunflower River Interstate Yes ___ No ___
Navigable Yes No ___

DISCUSSION (Use additional sheet if required):

Insecticide washdown water is treated with caustic + charcoal filter system prior to entering city system. Herbicide washdown water enters a septic tank drain field. Drying clay used for absorption of liquid spills is land filled. No container disposal problem exists because materials are handled in bulk. Riverside plans to install a solvent wash system which will curtail insecticide washdown.

LEGAL ACTION REQUIRED: Yes ___ No ___ . If yes, what _____
FURTHER ACTION REQUIRED: Yes No ___ . If yes, what _____ date _____

Draft NPDES Permit for cooling water

(Attach supporting info.)

Distribution: _____

Reported by: Larry Moore

FILE COPY

July 24, 1975

Mr. Paul J. Traina
Director, Enforcement Division
Environmental Protection Agency
1421 Peachtree Street, N.E.
Atlanta, Georgia 30309

Dear Mr. Traina:

Enclosed you will find two copies of the NPDES applications submitted by the following applicants.

1. Fortenberry's Slaughterhouse - Sandy Hook
Application No. - MS0030813
2. Brookhaven Slaughterhouse
Application No. - MS0030716
3. Brumfield's Meat Processing - Tylertown
Application No. - MS0030791
4. Green County Slaughterhouse - Leakesville
Application No. - MS0030767
5. Hickman Slaughterhouse - Gulfport
Application No. - MS0030643
6. Holmes County Ice & Cold Storage
Application No. - MS0030724
7. Winston County Meat Processing
Application No. - MS0030732
8. Lang's Wholesale Meat - Magnolia
Application No. - MS0030741

Mr. Paul J. Traina
July 24, 1975
Page -2-

9. Coon's Processing - Summit
Application No. - MS0030759
10. Prospect Processing Plant - Richton
Application No. - MS0030775
11. Riverside Chemical - Clarksdale
Application No. - MS0030783 ← This copy for
12. Forbes Meat Processing - Sandy Hook
Application No. - MS0030805
13. King's Slaughterhouse - Summit
Application No. - MS0030821
14. Quaves Slaughterhouse - Wiggins
Application No. - MS0030830

Very truly yours,

Glen Wood, Jr.
Executive Director

GWjr:SN:bw
Enclosure

MISSISSIPPI AIR AND WATER POLLUTION CONTROL COMMISSION

INFORMATION SHEET

AGRICULTURAL CHEMICAL MANUFACTURER

Company name Riverside Chemical Company

Plant address _____

City Clarksdale Zip code 38614

Plant Manager John Duff Telephone no. 627-5283

Products of this plant Insecticides and pesticides

Operations which result in wastewater discharge _____

Insecticide - only washdown water used - goes through charcoal filtering system. Herbicide - approved septic tank and drain field (washdown water only).

Discharge is continuous _____ or batch X

Approximate volume _____

Frequency of batch discharge Once a month

Description of waste disposal practices including spill prevention and containment _____

Drying clay used for absorption - Put in drums and buried.

Remarks: _____

Signed Othel Anding *1/28/75*

Date July 10, 1975

JUL 13 1975