



Howard.Ralph@epamail.epa.gov  
 02/02/2009 01:25 PM

To Robert\_Huckaby@deq.state.ms.us  
 cc Phillip\_Weathersby@deq.state.ms.us  
 bcc

Subject Fwd: Red Panther, note on S'eastern

Guys, we'll be talking about Red Panther more.

For now, wanted you to know we are underway on the HRS package prep. We met Friday morning here, a brief scoping meeting. Always appreciate your assistance, and Allyson will be talking with you about some documents that she/we think exist, from mention elsewhere, but don't have. Obviously we want the strongest possible package, so we'll be asking you to perhaps help us dig out some things.

So - we march on. Still awaiting remaining data on Southeastern; I believe we do have some in (semi-volatiles) but not all of even the semis. More coming.

---

Ralph O. Howard, Jr. P.G.  
 Site Evaluation Coordinator, Remedial Project Manager  
 Superfund Remedial & Site Evaluation Branch,  
 Superfund Division, U.S. EPA Region 4, Atlanta GA  
 (Mail) 61 Forsyth St.- Atlanta GA 30303

(Voice) 404-562-8829  
 (Email) <Howard.Ralph@epa.gov>

----- Forwarded by Ralph Howard/R4/USEPA/US on 02/02/2009 02:19 PM -----

"Allyson Warrington" <AWarrington@otiesolutions.com>	To <Robert_Huckaby@deq.state.ms.us>
02/02/2009 01:12 PM	cc Ralph Howard/R4/USEPA/US@EPA, "Stacy Kowalski" <SKowalski@otiesolutions.com>
	Subject Red Panther

Good Afternoon, Robert!

Hope this finds you well! I'm happy to inform you that TN&A was given the task to complete a Preliminary Scoring Strategy (PSS) and subsequent

HRS Package for Red Panther Chemical Co. under Ralph Howard's direction. Stacy Kowalski and I will be co-authoring these deliverables and will be contacting you in the near future. In the meantime, we are identifying data gaps (missing logbooks, manifests, etc.) that will enable the HRS Package to be prepared with minimal loopholes.

I look forward to talking to you soon!

Sincerely,

Allyson Warrington  
Senior Environmental Scientist  
U.S. EPA Region 4 START Site Assessment Coordinator

(Embedded image moved to file: pic11240.jpg)  
1220 Kennestone Circle, Suite D  
Marietta, GA 30066  
Phone: 678-355-5550 ext. 5709  
Fax: 770-528-0167  
Email: awarrington@otiesolutions.com



pic11240.jpg



"Allyson Warrington"  
<AWarrington@otiesolutions.com>

02/02/2009 12:12 PM

To <Robert\_Huckaby@deq.state.ms.us>

cc <Howard.Ralph@epamail.epa.gov>, "Stacy Kowalski"  
<SKowalski@otiesolutions.com>

bcc

Subject: Red Panther

Good Afternoon, Robert!

Hope this finds you well! I'm happy to inform you that TN&A was given the task to complete a Preliminary Scoring Strategy (PSS) and subsequent HRS Package for Red Panther Chemical Co. under Ralph Howard's direction. Stacy Kowalski and I will be co-authoring these deliverables and will be contacting you in the near future. In the meantime, we are identifying data gaps (missing logbooks, manifests, etc.) that will enable the HRS Package to be prepared with minimal loopholes.

I look forward to talking to you soon!

Sincerely,

*Allyson Warrington*

Senior Environmental Scientist

U.S. EPA Region 4 START Site Assessment Coordinator



1220 Kennestone Circle, Suite D

Marietta, GA 30066

Phone: 678-355-5550 ext. 5709

Fax: 770-528-0167

Email: awarrington@otiesolutions.com



Howard.Ralph@epamail.epa.gov  
12/05/2008 03:32 PM

To Jones.Katrina@epamail.epa.gov,  
Walker.Darryl@epamail.epa.gov  
cc Phillip\_Weathersby@deq.state.ms.us,  
Taylor.Dawn@epamail.epa.gov,  
Robert\_Huckaby@deq.state.ms.us

bcc

Subject Need to initiate START3 TDD to Prep HRS Package: MS Site

Katrina, Darryl,

I need to open a TDD under START3 for HRS Package Prep. In the last couple weeks I needed to take two other preceding steps, those being to discuss with my boss Dawn Taylor and our branch chief what the overall strategy is and making sure we understand our State's concerns, and secondly, to talk with Jennifer Wendel about the workload of each of our contractors and who we should use on this. Those steps (finally) are complete.

TN & A did the Site Inspection here, and Jennifer indicated there's no reason it shouldn't be them doing it. They are familiar with the site. After consulting with Jennifer briefly I judge it to need a "Medium-Complexity" level of work, on the Package. As usual, she asks to be "Co-Task Monitor" on the HRS Package Prep assignment.

Here below is the Site Info, please call me with questions or whatever else I need to do. Thanks.-

Red Panther Chemical Company  
Clarksdale, Coahoma County, Mississippi  
MSD 000 272 385



(Embedded image moved to file: pic08139.gif) pic08139.gif

Phillip  
Weathersby/HW/OPC/DEQ  
10/30/2008 11:29 AM

To Robert Huckaby/HW/OPC/DEQ@DEQ  
cc  
bcc  
Subject

----- Forwarded by Phillip Weathersby/HW/OPC/DEQ on 10/30/2008 11:25 AM -----



Howard.Ralph@epamail.epa.  
gov  
10/30/2008 11:23 AM

To Phillip\_Weathersby@deq.state.ms.us  
cc  
Subject Fwd: (1/3) Revised Red Panther SI and let's set a time to talk  
on Mon 11/3...

Phillip, attached is the revised Red Panther Chemical Co. SI - sorry for the delay, a lot moved on while I was out with all my Mom's stuff going on...Atch here is the text, the following messages have other pieces of the report. (I recall giving you a disk in August - it was a different site, right? Or was it some of this...)

The revised version does make the changes we had talked about, although, I'm still a little concerned about the connection between the site, and the adjoining neighborhood, that connection being made clear enough.

Can we set a time to talk on say, Monday afternoon? In addition to Red Panther, i.e. this report and a coordinated approach to further actions there at Red P., I wanted to review a bit on Southern Pine and on Walcotte Chemical No. 2, and also Enterprise Recovery Systems and the nearby PSA. Just let me know a good time for you; I was going to suggest 2 PM Central/3PM Eastern.

(See attached file: Red Panther SI Report Rev1\_Final.pdf)

(See attached file: Red Panther Conf Pgs Rv1\_Final.pdf)

(See attached file: Red Panther Scores Rev. 1\_Final.pdf)

(See attached file: Red Panther SI\_Appendix B\_Tables.pdf)

---

Ralph O. Howard, Jr., P.G.  
Remedial Project Manager,  
Site Evaluation Coordinator (AL, MS)  
US Environmental Protection Agency Region 4, Atlanta GA  
Superfund Division, Superfund Remedial and  
Site Evaluation Branch  
Office 404/562-8829, fax -8788

Email - Howard.Ralph@epa.gov Red Panther SI Report Rev1\_Final.pdf Red Panther Conf Pgs Rv1\_Final.pdf



Red Panther Scores Rev. 1\_Final.pdf Red Panther SI\_Appendix B\_Tables.pdf  
 ---- Forwarded by Phillip Weathersby/HW/OPC/DEQ on 10/30/2008 11:25 AM ----



Howard.Ralph@epamail.epa.gov

10/30/2008 11:23 AM

To Phillip\_Weathersby@deq.state.ms.us

cc

Subject Fwd: (2/3) Revised Red Panther SI

Part 2 of 3

Appendix A Figures - size = 5.6 MB

(See attached file: Red Panther SI\_Appendix A\_Figures.pdf)



Red Panther SI\_Appendix A\_Figures.pdf

---- Forwarded by Phillip Weathersby/HW/OPC/DEQ on 10/30/2008 11:25 AM ----



Howard.Ralph@epamail.epa.gov

10/30/2008 11:24 AM

To Phillip\_Weathersby@deq.state.ms.us

cc

Subject Fwd: (3/3) Revised Red Panther SI

Part 3 of 3

Appendices D (1.83 MB) and E (1.7 MB)

(See attached file: Red Panther SI\_Appendix E\_Photographic Log.pdf)

(See attached file: Red Panther SI\_Appendix D\_Logbook Notes.pdf)

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[Phillip - Not included here are the Lab Data Sheets (Appx C).  
 I'll provide those, they're just huge & I didn't want to rtry to send.  
 - RH.]



Red Panther SI\_Appendix E\_Photographic Log.pdf Red Panther SI\_Appendix D\_Logbook Notes.pdf



Howard.Ralph@epamail.epa.gov  
05/20/2008 10:25 AM

To Robert\_Huckaby@deq.state.ms.us  
cc Phillip\_Weathersby@deq.state.ms.us, Allyson Warrington  
<awarrington@tnainc.com>  
bcc

Subject Re: Red Panther Chemical Company: Site Inspection Report Delivery

Hey Allyson,

I finally talked with Donna W. about this this morning. I'm forwarding Robert a copy here of your email version, so he can begin to have a look. I think that by "copy of the report" you mean all the stuff that won't fit here, as you mention: the figures, photo log, and raw data sheets - that makes sense...So Yes, please go ahead and send Robert a copy of the disc also, with the rest of it.

Robert - let me know of any difficulties with these files & we'll work around.

Ralph O. Howard, Jr.  
Ralph O. Howard, Jr., P.G.  
Remedial Project Manager,  
Site Evaluation Coordinator (AL, MS)  
US Environmental Protection Agency, Region 4  
Superfund Division, Superfund Remedial and  
Site Evaluation Branch  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street SW  
Atlanta, Georgia 30303  
Office 404/562-8829, fax -8788

----- Forwarded by Ralph Howard/R4/USEPA/US on 05/20/2008 11:18 AM -----

"Allyson Warrington"	To
<awarrington@tnainc.com>	Ralph Howard/R4/USEPA/US@EPA
	cc
05/19/2008 03:42 PM	Donna Webster/R4/USEPA/US@EPA, "Greg Kowalski" <gkowalski@tnainc.com>
	Subject
	Red Panther Chemical Company: Site Inspection Report Delivery

Ralph,

Donna asked me to send you this report since you have taken over the site. I believe the FedEx label for the hardcopy report is being sent to Donna. I hope this is okay given that your offices next to each other. If not, please let me know.

Also, Robert Huckaby (MDEQ) asked for a copy of the report. I have not sent him one at this point. With your approval, I can do so; otherwise, I will assume that EPA will give Robert the information he needs.

As always, feel free to contact me with any questions or comments since Donna was the Task Monitor at the time of the TN&A sampling investigation.

Sincerely,  
Allyson

From: Allyson Warrington  
Sent: Monday, May 19, 2008 3:23 PM  
To: 'Webster.Donna@epamail.epa.gov'  
Cc: Limari Krebs; Greg Kowalski; 'walker.darryl@epa.gov';  
'Jones.Katrina@epamail.epa.gov'  
Subject: Red Panther Chemical Company: Site Inspection Report Delivery

Good Afternoon, Donna:

TN&A is pleased to submit the Site Inspection Report for the Red Panther Chemical Company, TDD No. TNA-05-003-0004. The tables, confidential pages, and scoresheets are also included in this submittal. Due to size constraints through email, the figures, logbook pages, photographic log, and analytical data are included in the hardcopy only. The entire hardcopy deliverable and CD will be sent via FedEx.

If you have any questions or comments regarding this submittal, please contact me at 678-355-5550 ext. 5709.

Sincerely,

Allyson Warrington

T N & Associates, Inc.  
Senior Environmental Scientist  
U.S. EPA Region 4 START Site Assessment Coordinator  
1220 Kennestone Circle, Suite D  
Marietta, GA 30066  
Phone: 678-355-5550 ext. 5709  
Fax: 678-355-5545

(See attached file: Red Panther SI Report Rev 0\_Final.pdf) (See attached file: Red Panther SI\_Appendix B\_Tables.pdf) (See attached file: Red Panther 1-20\_Final\_Scoresheets.pdf) (See attached file: Red Panther

Confidential Pages.pdf)  Red Panther SI Report Rev 0\_Final.pdf  Red Panther SI\_Appendix B\_Tables.pdf

 Red Panther 1-20\_Final\_Scoresheets.pdf  Red Panther Confidential Pages.pdf



**Robert  
Huckaby/HW/OPC/DEQ**  
10/10/2007 02:22 PM

To [awarrington@tnainc.com](mailto:awarrington@tnainc.com)  
cc  
bcc  
Subject Permanent Well at Red Panther

Allyson,

I have found the Memphis Environmental report regarding the installation of the permanent wells. It is indeed MW-2 that was discovered. I have copied the entire report and put it in the mail to you. It includes driller's logs and analytical data for all the wells. If you don't get it in the next couple of days please let me know.

Thanks  
Robert



"Allyson Warrington"  
<awarrington@tnainc.com>  
09/27/2007 03:05 PM

To <Webster.Donna@epamail.epa.gov>  
cc "Greg Kowalski" <gkowalski@tnainc.com>,  
<walker.darryl@epa.gov>,  
<Jones.Katrina@epamail.epa.gov>,  
bcc

Subject Red Panther Chemical Co.: Health & Safety Plan

Good Afternoon, Donna!

Attached is the HASP (and hospital route) for Red Panther Chemical Co. Sampling activities are scheduled for the week of October 8, 2007. Please contact me with any questions or comments.

Sincerely,

*Allyson Warrington*

T N & Associates, Inc.  
Environmental Scientist/START Site Assessment Coordinator  
1220 Kennestone Circle, Suite D  
Marietta, GA 30066  
Phone: 678-355-5550 ext. 5709  
Fax: 678-355-5545



Red Panther HASP.pdf

**HEALTH AND SAFETY PLAN FORM**  
 TN&Associates Health and Safety Program

This document is for the exclusive use of TN&Associates its subcontractors, and EPA. **TN & ASSOCIATES**  
 Site Name: **Red Panther Chemical Company**

**PROJECT NAME:** Red Panther Chemical Company  
**PROJECT#:** TNA-05-003-0004  
**LOCATION:** Clarksdale Coahoma County Mississippi

**DATE:** 9/25/2007  
**CLIENT:** EPA  
**EPA CONTACT/PHONE #:** Donna Webster 404-562-8870  
**LOCAL/SITE CONTACT PHONE #:** TBD

**INCIDENT DESCRIPTION:**  
 Removal Assessment

**SOURCE OF PRELIMINARY INFORMATION:** U.S. EPA site files

**ANTICIPATED TASKS:**  
 (e.g. collect surface soil samples):  
 START will collect groundwater samples from 9 temporary groundwater monitoring wells that will be installed using a Geoprobe; and, 4 existing municipal wells.

**TYPE:** Check as many as applicable

Active	<input type="checkbox"/>	Landfill	<input type="checkbox"/>	Spill	<input type="checkbox"/>
Inactive	<input checked="" type="checkbox"/>	Uncontrolled	<input type="checkbox"/>	Fire	<input type="checkbox"/>
Secure	<input checked="" type="checkbox"/>	Industrial	<input checked="" type="checkbox"/>	Military	<input type="checkbox"/>
Unsecure	<input type="checkbox"/>	Recovery	<input type="checkbox"/>	Unknown	<input type="checkbox"/>
Enclosed space	<input type="checkbox"/>	Well Field	<input type="checkbox"/>	Other (specify)	<input type="checkbox"/>

**DESCRIPTION AND FEATURES:** Include principal operations and unusual features (containers, buildings, dikes, power lines, hillslopes, rivers, etc.)  
 Red Panther operated as a pesticide formulation plant between 1949 and 1978. The former facility is approximately 6.5 acres in size and is bordered to the north by commercial property (Graeber Brothers), to the south by Sasse Street, to the east by Patton Street and Normandy Avenue/Leflore Street, and to the west by East Tallahatchie Street/Old Highway 49 South and the Illinois Central Railroad tracks.

Former operation features included a septic tank and drainfield located on the north side of the property; three hazardous waste above-ground storage tanks (AST) with a total capacity of 33,000 gallons located on the south side of the property. A small wastewater settling basin was located on the east central side of the property. Several structures remain on the property; however, their use is undetermined at this time.

**SURROUNDING POPULATION:** (X) Residential ( ) Industrial ( ) Commercial ( ) Rural ( ) Urban ( ) Other:

**HEALTH AND SAFETY PLAN FORM**

TN & Associates Health and Safety Program

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TN & ASSOCIATES

Site Name: Red Panther Chemical Company

**HISTORY:**

Summarize conditions that relate to hazard. Include citizen complaints, spills, previous investigations or agency actions, known injuries, etc. Red Panther is currently used by Coahoma, Inc. as a storage facility for seeds, cotton, and farm chemicals. It operated as a pesticide formulation plant between 1949 and 1978. Contamination on the property is believed to have originated from numerous spills during loading and unloading operations, from leaking transport piping between the process and tank farm areas, contaminated wastewater releases, and from spills and leaking underground. In November 1985, contaminated runoff from a fire at one of the warehouses resulted in a fish kill in the nearby Sunflower River. U.S. EPA completed a removal action of buried drums on the property in 1997. Between 2002 and 2005, PRP's associated with Red Panther performed a removal action on surface soils from drainage ditches between the Red Panther property boundaries and Route 49, and on-site soil. Additionally, 8 ASTs were dismantled, the contents disposed of appropriately, and recycled. Numerous investigations have been performed at the site either by EPA, the MSBPC, or the PRP. EPA's current sampling project is to determine if there is contamination in the groundwater at the site because all drinking water in the study area comes from groundwater sources.

**WASTE TYPES:** (X) Liquid ( ) Solid ( ) Sludge ( ) Gas (X) Unknown ( ) Other:

**WASTE CHARACTERISTICS:** Check as many as applicable.

- ( ) Corrosive ( ) Flammable ( ) Radioactive
- (X) Toxic (X) Volatile ( ) Reactive
- ( ) Inert Gas ( ) Unknown ( ) Other, Specify: \_\_\_\_\_

**WORK ZONES:**

Describe the Exclusion, Contamination Reduction, and Support Zones in terms on-site personnel will recognize

The Work zone will surround the Geoprobe when in operation

**HAZARDS OF CONCERN:**

- (X) Heat Stress *attach guidelines*
- ( ) Cold Stress *attach guidelines*
- ( ) Explosive/Flammable
- ( ) Oxygen Deficient
- ( ) Radiological
- ( ) Biological
- ( ) Other, Specify: \_\_\_\_\_
- (X) Noise
- ( ) Inorganic Chemicals
- (X) Organic Chemicals
- ( ) Motorized Traffic
- (X) Heavy Machinery
- (X) Slips, Trips, & Falls

**FACILITY'S PAST AND PRESENT DISPOSAL METHODS AND PRACTICES:**

Red Panther operated under a RCRA Part B Permit from 1984 to 1986; however, prior to that, the facility discharged wastewater and spent solvents directly to an off-site ditch or into an underground leaching field on the property.

<b>HEALTH AND SAFETY PLAN FORM</b>		This document is for the exclusive use of TN&Associates its subcontractors, and EPA.		<b>TN &amp; ASSOCIATES</b>	
<b>TN&amp;Associates Health and Safety Program</b>		Circle waste type and estimate amounts by category.		<b>Site Name: Red Panther Chemical Company</b>	
<b>HAZARDOUS MATERIAL SUMMARY:</b>					
<b>CHEMICALS:</b> Amount/Units:	<b>SOLIDS:</b> Amount/Units:	<b>SLUDGES:</b> Amount/Units:	<b>SOLVENTS:</b> Amount/Units:	<b>OILS:</b> Amount/Units:	<b>OTHER:</b> Amount/Units:
Pesticides Unknown  Metals arsenic, lead					
<b>OVERALL HAZARD EVALUATION:</b> ( ) High ( ) Medium (X) Low ( ) Unknown					
<b>JUSTIFICATION:</b> Overall hazards of concern is the physical hazards on site. There are slip trip and fall dealing with operations of the geoprobe and working around the area of concern					
<b>FIRE/EXPLOSION POTENTIAL:</b> ( ) High ( ) Medium ( ) Low (X) Unknown					
<b>INFORMATION COMPLETE:</b> ( ) Complete ( ) Incomplete (X) Best Available at Current Time					

**HEALTH AND SAFETY PLAN FORM**  
**TN & Associates Health and Safety Program**

*This document is for the exclusive use of TN&Associates its subcontractors, and EPA.*

**TN & ASSOCIATES**

Site Name: Red Panther Chemical Company

KNOWN CONTAMINANTS	NIOSH		OSHA		SYMPTOMS & EFFECTS OF ACUTE EXPOSURE	PHOTO IONIZATION POTENTIAL
	REL (ST if Available) ppm or mg/m <sup>3</sup> (specify)	PEL (ST if Available) ppm or mg/m <sup>3</sup> (specify)	IDLH ppm or mg/m <sup>3</sup> (specify)	IDLH ppm or mg/m <sup>3</sup> (specify)		
Dieldrin	0.25 mg/m <sup>3</sup>	TWA 0.005 mg/m <sup>3</sup>	9 mg/m <sup>3</sup>		headache; chills, muscle aches; nausea, vomiting, diarrhea; anosmia, emphysema, proteinuria, mild anemia; [potential occupational carcinogen]	NA
Lead	TWA 0.050 mg/m <sup>3</sup>	TWA 0.050 mg/m <sup>3</sup>	100 mg/m <sup>3</sup>		Lassitude (weakness, exhaustion), insomnia; facial pallor, anorexia, weight loss, malnutrition; constipation, abdominal pain, colic; anemia; gingival lead line; tremor; paralysis wrist, ankles; encephalopathy; kidney disease; irritation eyes; hypotension	NA
Arsenic	Ca C 0.002 mg/m <sup>3</sup> [15-m TWA	0.010 mg/m <sup>3</sup>	5 mg/m <sup>3</sup>		Ulceration of nasal septum, dermatitis, gastrointestinal disturbances, peripheral neuropathy, respiratory irritation, hyperpigmentation of skin, [potential occupational carcinogen]	NA

NA = Not Available      NE = None Established      U = Unknown

S = Soil      SW = Surface Water      T = Tailings      you will use at the site.  
A = Air      GW = Ground Water      SL = Sludge      SD = Sediment  
W = Waste      D = Drums      OFF = Off-Site

# HEALTH AND SAFETY PLAN FORM

*This document is for the exclusive use of*

**TN & ASSOCIATES**

Site Name: Red Panther Chemical Company

*TN& Associates its subcontractors, and EPA.*

## Task Description / PPE / Personnel & Responsibilities (attach additional sheets as necessary)

<b>Task 1</b>	Installing/sampling temporary wells	<b>Type</b>	Non-Intrusive	<b>Hazard Schedule</b>	Low
<b>Description</b>					
<b>Primary Level</b>					
<b>D</b>					
<b>PPE:</b>					
	Respiratory: none				
	Eyewear: Eye protection				
	Boots: Steel-Toe				
	Gloves: Inner: nitrile				
	Clothing: Coveralls				
	Contingency Level				
	C				
	Respiratory: APR				
	Eyewear:				
	Boots: Steel-Toe				
	Gloves: Inner: Nitrile				
	Clothing: Tyvek				

<b>Task 2</b>	Collect samples from 4 municipal well	<b>Type</b>		<b>Hazard Schedule</b>	
<b>Description</b>					
<b>Primary Level</b>					
<b>D</b>					
<b>PPE:</b>					
	Respiratory: none				
	Eyewear: Eye protection				
	Boots: Steel-Toe				
	Gloves: Inner: nitrile				
	Clothing: Coveralls				
	Contingency Level				
	C				
	Respiratory: APR				
	Eyewear:				
	Boots: Steel-Toe				
	Gloves: Inner: Nitrile				
	Clothing: Tyvek				

<b>Task 3</b>	Operating the Geoprobe	<b>Type</b>		<b>Hazard Schedule</b>	
<b>Description</b>					
<b>Primary Level</b>					
<b>D</b>					
<b>PPE:</b>					
	none				
	Eye protection				
	Steel-Toe				
	Inner: nitrile				
	Clothing: Coveralls				
	Contingency Level				
	C				
	Respiratory: APR				
	Eyewear:				
	Boots: Steel-Toe				
	Gloves: Inner: Nitrile				
	Clothing: tyvek				

<b>Task 4</b>	Overall	<b>Type</b>		<b>Hazard Schedule</b>	
<b>Description</b>					
<b>Primary Level</b>					
<b>D</b>					
<b>PPE:</b>					
	Respiratory:				
	Eyewear:				
	Boots:				
	Gloves:				
	Clothing:				
	Contingency Level				
	PPE:				

### PERSONNEL AND RESPONSIBILITIES

Name	Company/Agency	Training	Responsibilities
Kelly Patten	TN&A	40-Hr HAZWOPER	Project Geologist
Adam Davis	Aerostar	40-Hr HAZWOPER	Field Team Leader
Michael Thompson	TN&A	40-Hr HAZWOPER	Field Sampler
TBD	TBD	40-Hr HAZWOPER	Field Sampler

**HEALTH AND SAFETY PLAN FORM** *This document is for the exclusive use of* **TN & ASSOCIATES**  
**TN & Associates Health and Safety Program** *TN&Associates its subcontractors, and EPA* **Site Name: Red Panther Chemical Company**

Monitoring Equipment:		Specify by task. Indicate type as necessary. Attach additional sheets if needed.	
Tasks:	Instrument:	Level:	Action Guidelines:
1, 2, and 3	Multi RAE	D 0 - 5 ppm (units) above background consistently (1min) for unknown chem level D 5 - 50 ppm (units) above background consistently (1min) for unknown chem level C > 50 ppm Level B	Comments: Mainly used for headspace and geoprobe information (based on non-benzene)
Tasks:	Instrument:	Level:	Comments:
Tasks:	Instrument:	Level:	Comments:
Tasks:	Instrument:	Level:	Comments:
Tasks:	Instrument:	Level:	Comments:



**HEALTH AND SAFETY PLAN FORM**  
 TN&A associates Health and Safety Program

This document is for the exclusive use of TN&A associates its subcontractors, and EPA.

**TN & ASSOCIATES**  
 Site Name: Red Panther Chemical Company

**EMERGENCY CONTACTS**

Site Telephone TBD  
 EPA Release Report # \_\_\_\_\_  
 TN&Assoc 24-Hr Emergency # 312-296-9186  
 Facility Management \_\_\_\_\_  
 Other (specify) \_\_\_\_\_  
 CHEMTREC Emergency #: 1-800-424-9300

**EMERGENCY CONTACTS**

EMERGENCY CONTACTS	NAME	PHONE
Health and Safety Manager	Bill Fink	414-234-7845
Project Manager	Ron Bugg	312-296-9186
Site Safety Coordinator	Kelly Patten	678-255-5542
Client Contact (EPA RPM)	Donna Webster	
Other (EPA HRS coordinator)	MDEQ	601-961-5302
State Agency		
State Spill Number		662-627-8480 or 911
Fire Department		662-621-8151 or 911
Police Department		911
State Police		
Health Department		662-624-8316
Poison Control Center		800-222-1222
Occupational Physician	Dr. Jerry Berke,	800-350-4511
	Health Resources	

**CONTINGENCY PLANS:**

*Summarize below*  
 Contact corporate Health and Safety officer, William Fink, at 414-234-7845 or Ron Bugg at 312 220-7000 (ext 26) or by cell phone 312 296-9186

**MEDICAL EMERGENCY**

Hospital Name: Northwest Regional Medical Ctr **662-627-3211**  
 Hospital Address: 1970 Hospital Drive, Clarksdale, MS  
 Name of Contact at Hospital: \_\_\_\_\_  
 Name of 24-Hour Ambulance: Emergystat **662-624-9400**  
 Route to Hospital: (see attached sheet)  
 Exit site towards Desoto Avenue, turn left on Desoto Avenue.  
 Turn slight R on State Street/MS-161  
 Turn slight R onto Hospital Drive.

**HEALTH AND SAFETY PLAN APPROVALS**

Prepared by Limari Krebs Date 9/24/2007  
 DHSC Signature \_\_\_\_\_ Date 9/28/2007  
 HSM Signature \_\_\_\_\_ Date \_\_\_\_\_

Distance to Hospital: ~1.5 miles










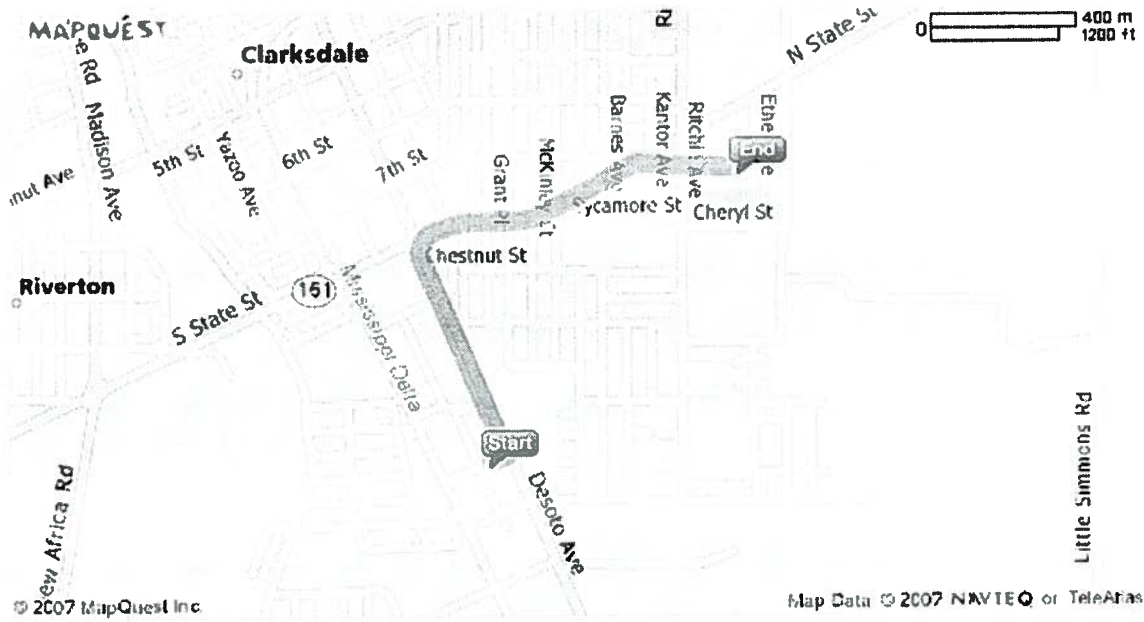
**Start:** 550 Patton St  
Clarksdale, MS 38614, US

**End:** 1970 Hospital Dr  
Clarksdale, MS 38614-7202, US

**Notes:**

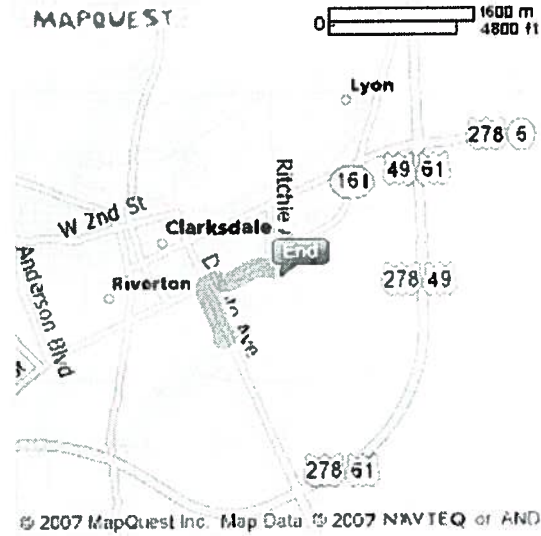
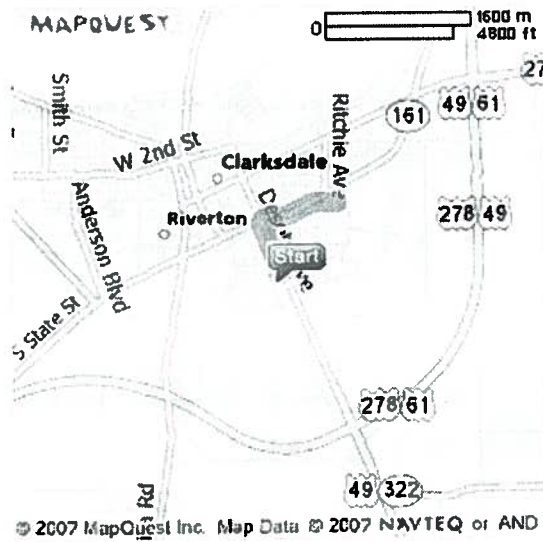
Only text visible within note field will print.

Directions	Distance
<b>Total Est. Time: 4 minutes      Total Est. Distance: 1.24 miles</b>	
 <b>1:</b> Start out going NORTHEAST on PATTON ST toward DESOTO AVE.	<0.1 miles
 <b>2:</b> Turn LEFT onto DESOTO AVE.	0.4 miles
 <b>3:</b> Turn SLIGHT RIGHT onto N STATE ST / MS-161.	0.5 miles
 <b>4:</b> Turn SLIGHT RIGHT onto HOSPITAL DR.	0.2 miles
 <b>5:</b> End at 1970 Hospital Dr Clarksdale, MS 38614-7202, US	
<b>Total Est. Time: 4 minutes      Total Est. Distance: 1.24 miles</b>	



**Start:**  
**550 Patton St**  
 Clarksdale, MS 38614, US

**End:**  
**1970 Hospital Dr**  
 Clarksdale, MS 38614-7202, US



**All rights reserved. Use Subject to License/Copyright**  
 These directions are informational only. No representation is made or warranty given as to their content, road conditions or route usability or expeditiousness. User assumes all risk of use. MapQuest and its suppliers assume no responsibility for any loss or delay resulting from such use.



"Allyson Warrington"  
<awarrington@tnainc.com>  
09/24/2007 11:15 AM

To <Robert\_Huckaby@deq.state.ms.us>  
cc <Webster.Donna@epamail.epa.gov>  
bcc  
Subject Revised Geoprobe SOW: Red Panther

A correction was made to the date listed in the driller Scope of Work. Please replace the original SOW with this one.

Thank you,

*Allyson Warrington*

T N & Associates, Inc.  
Environmental Scientist/START Site Assessment Coordinator  
1220 Kennestone Circle, Suite D  
Marietta, GA 30066  
Phone: 678-355-5550 ext. 5709  
Fax: 678-355-5545



Geoprobe SOW Red Panther.pdf

**STATEMENT OF WORK  
DRILLING SERVICES  
Red Panther Chemical Company  
Clarksdale, Mississippi**

**1. Introduction**

This Scope of Work describes the work to be performed using a 6610/6620/7730 series Geoprobe® drill rig (or compatible truck-mounted rig) to collect groundwater samples at the former Red Panther Chemical Company in Clarksdale, Coahoma County, Mississippi. **Drilling activities will begin Monday, October 8, 2007 at 0800 CST.**

**2. Site Background**

The Red Panther Chemical Company is located at 550 Patton & Leflore Roads in Clarksdale, Mississippi. The geographic coordinates from the center of the property are 34° 11' 14" north latitude and 90° 33' 43" west longitude. The facility is bordered to the north by commercial property, to the south by Sasse Street, to the east by Patton Street and Normandy Avenue/Leflore Street, and to the west by East Tallahatchie Street/Old Highway 49 South and the Illinois Central Railroad tracks. See the attached map for the exact site location.

The former Red Panther facility is approximately 6.5 acres in size. Former facility features included a septic tank and drainfield located on the north side of the property. Three hazardous waste above-ground storage tanks (ASTs) with a total capacity of 33,000 gallons were located on the south side of the property. A small wastewater settling basin was located on the east central side of the property. Several structures remain on the property; however, their use is undetermined at this time.

**3. Site Topography/Geology**

The topography of the area is relatively flat, with an average elevation at 175 feet above mean sea level (amsl). The property is situated at 170 feet amsl. Drainage pipes direct surface water runoff to the east and west into off-site ditches and storm water drains, which lead to the Sunflower River, located less than 0.5 mile west of the facility.

Clarksdale is located in the northwestern portion of the State of Mississippi within the Mississippi Delta physiographic province. The stratigraphic units in this part of the state include, in descending order; the Mississippi River Alluvium, Cook Mountain Formation, Sparta Sand, Zilpha Clay and Winona Sand, Tallahatta Formation, Meridian-Upper Wilcox Aquifer, Wilcox Group, and the Lower Wilcox Aquifer.

The alluvium directly underlies the property, dips gently to the south, and is exposed at the surface over its entire area of occurrence. The alluvium ranges from less than 50 feet to more than 200 feet thick, with an average thickness of 140 feet. The alluvium generally consists of three layers: a discontinuous silty clay layer, a middle sand layer, and a lower gravel layer.

The Cook Mountain underlies the alluvium and is composed of clay and shale. In some portions of northwestern Mississippi, the Cook Mountain confines the underlying Sparta Aquifer. However, geophysical logs of wells near the site suggest that Cook Mountain is approaching a stratigraphic pinch-out in the Clarksdale area.

The Sparta Sand underlies the Cook Mountain and is composed of rounded, well-sorted quartz grains in two or three thick beds separated by beds of clay. The thickness of the Sparta Sand ranges from 420 to 480 feet.

The Zilpha and Winona Formation underlies the Sparta Sand and occurs at approximately 655 feet below land surface (bls). The Zilpha overlies the Winona and consists of dark-brown clay. The Winona consists of glauconitic fossiliferous sands and clays.

The Tallahatta Formation is hydraulically connected to the overlying Winona and contains several thick to very thin sand beds separated by clay. Thickness ranges from 50 to 400 feet, with an average thickness of slightly more than 200 feet. The formation dips to the west and southwest.

The Meridian Sand underlies the Tallahatta and is a massive unit consisting of fine-to-coarse micaceous sand that dips west to southwest. The average thickness is approximately 160 feet.

The Mississippi River Valley Alluvial Aquifer is a water table aquifer located along the western boundary of the state and underlies the property. Generally, recharge is from the direct infiltration of rainfall into the aquifer, and water moves to the south and towards streams in the area. Some water moves into the underlying Sparta and Cockfield Aquifers, which subcrop below the alluvium in the area. The Cook Mountain Formation, which acts as a confining unit throughout most of the state; however, it pinches out in the vicinity of the property indicating that the Alluvial and underlying Sparta aquifers are interconnected. Regionally, water in the Sparta flows from east to west. Water bearing sands within the Sparta, many 100 feet or more in thickness, are separated by varying thicknesses of clay. The Zilpha and Winona confining layer, consisting primarily of clay, retards the movement of water from the overlying Sparta Sand into the underlying Meridian-Upper Wilcox aquifer.

The Meridian-Upper Wilcox Aquifer consists of the Meridian Sand of the Tallahatta Formation and the uppermost sand beds of the Wilcox Group. These units are regarded

as one aquifer because they are hydraulically connected. The Upper Wilcox Aquifer consists of sandy clay. The regional movement of water in the aquifer is westward.

The Lower Wilcox is the deepest aquifer underlying the region and consists of a thick sand unit containing over 60 percent sand. The aquifer dips to the southwest in the southern part of the region. Multiple clay beds in the overlying part of the Wilcox hydraulically separate the Lower Wilcox Aquifer from overlying aquifers. The Lower Wilcox Aquifer occurs approximately 1,900 feet bls and extends to a depth of approximately 2,100 feet in the vicinity of the property.

Groundwater is expected to be encountered between 25 to 30 feet bgs. However, with current drought conditions, water may not be encountered until 35 to 40 feet bgs.

#### 4. Groundwater Sampling Specifications

- Geoprobe® must have the ability to collect groundwater samples from temporary wells.
- Approximately nine (9) temporary wells will be installed. In order to determine the depth to groundwater, an exploratory boring/test hole will be drilled at a location determined in the field. Clear acetate liners will be used to extract soil cores from the boring for geologic soil logging.
- Driller shall provide both a grundfos and peristaltic pump (because depth to water is unknown) as well as a water level indicator.
- Driller shall provide Teflon-lined tubing to fit both the grundfos and peristaltic pumps. All tubing will be disposed of after use. Approximately 400 feet of tubing is needed for each pump in order to ensure the usage of whichever pump will pump from the water level encountered at the site.
- Non-disposable down-hole equipment must be decontaminated between boring locations.
- Equipment must be decontaminated between each temporary well. **Driller to provide pressure washer.**
- Temporary wells will be abandoned according to State regulations (with bentonite), and the surface patched with asphalt or cement as appropriate for the location. **Driller to provide all materials for well abandonment.**
- Soil cuttings and any decon/purge water will be placed in 55-gallon drums **provided by the driller.**

#### 5. Subcontractor Requirements

The following subcontractors will be required to complete this project as scoped:

- **Driller** – drilling, temporary well installation, must be provided by a contractor with relevant experience and a drilling license in the State of Mississippi.



- A decontamination pad may be utilized based on site contamination levels. The decontamination pad must be established and all fluids must be containerized.
- Driller is required to locate a water source (if needed) prior to the commencement of drilling activities and be ready to perform drilling at 0800 CST on Monday, October 8, 2007.
- Decontamination procedures must be in accordance with USEPA EISOPQAM Procedures (Nov. 2001).

TN&A, EPA, and State of Mississippi staff will be on site to supervise the drilling and well installation of the subcontractor driller.

#### **7. Schedule**

Mobilization to the area is suggested for Sunday, October 7<sup>th</sup>. Drilling activities will begin **Monday, October 8, 2007 at 0800 CST** and will require approximately 5 business days to complete.

Prior to drilling, all locations will be cleared for underground utilities by TN&A.

#### **8. Health and Safety**

All fieldwork performed by TN&A or under direct supervision of TN&A will be in strict accordance with the TN&A's Health and Safety Plan (HASP). A copy of the HASP will be available on site and followed during field operations.

#### **9. Quality Assurance Project Procedures**

TN&A's quality assurance/quality control (QA/QC) program extends over all aspects of this work, including field acquisition, data analysis, and report preparation. The EPA QAPP is the guide that will be followed for quality assurance objectives and procedures. A QA/QC officer will be appointed for all aspects of the project, with responsibility for the overall QA process and client satisfaction.

#### **10. Project Documentation**

Field logbooks and other appropriate project documentation will be completed in accordance with the approved QAPP. All variances to this work plan and/or the QAPP will be coordinated through and approved by the TN&A Project Manager. Documents for this field task include field logbooks, photos, drill logs, well construction logs, well and development forms.

## **11. Disposal of Investigation-Derived Waste**

Geoprobe® sampling can result in generation of (IDW), including potentially contaminated soil, groundwater, decontamination liquids, drilling fluids, and personal protective equipment (PPE). These materials will be placed in 55-gallon drums and retained on-site until further testing determines the analytical contents. Generally, solids and liquids will be deposited in separate buckets and labeled as IDW waste with the following information:

- Project Name/Task Order Number
- Date Drummed: MM-DD-YY
- Origin of the waste: (i.e., Boring Number)
- Media
- Name of individual who completed the label
- Telephone number of contact person

Arranging disposal of all IDW will be the responsibility of TN&A. TN&A will follow all of the requirements of the QAPP for disposal of all IDW generated during this field effort.



"Allyson Warrington"  
<awarrington@tnainc.com>  
09/11/2007 03:16 PM

To <Webster.Donna@epamail.epa.gov>  
cc <Robert\_Huckaby@deq.state.ms.us>  
bcc

Subject Red Panther Chemical Company: Geoprobe Scope of Work  
and Bid Form

Good Afternoon!

Attached is the Red Panther SOW and associated bid form for Geoprobe drilling services requested at the site. The Request for Proposal will be sent to 3 vendors in the morning, and a return bid will be requested on Friday.

If you have any questions or comments, please let me know. Otherwise, I will be sending this out in the morning.

Sincerely,

*Allyson Warrington*

T N & Associates, Inc.  
Environmental Scientist/START Site Assessment Coordinator  
1220 Kennestone Circle, Suite D  
Marietta, GA 30066  
Phone: 678-355-5550 ext. 5709  
Fax: 678-355-5545



Geoprobe SOW & Bid Form.pdf

**STATEMENT OF WORK  
DRILLING SERVICES  
Red Panther Chemical Company  
Clarksdale, Mississippi**

**1. Introduction**

This Scope of Work describes the work to be performed using a 6610/6620/7730 series Geoprobe<sup>®</sup> drill rig (or compatible truck-mounted rig) to collect groundwater samples at the former Red Panther Chemical Company in Clarksdale, Coahoma County, Mississippi. **Drilling activities will begin Monday, October 12, 2007 at 0800 CST.**

**2. Site Background**

The Red Panther Chemical Company is located at 550 Patton & Leflore Roads in Clarksdale, Mississippi. The geographic coordinates from the center of the property are 34° 11' 14" north latitude and 90° 33' 43" west longitude. The facility is bordered to the north by commercial property, to the south by Sasse Street, to the east by Patton Street and Normandy Avenue/Leflore Street, and to the west by East Tallahatchie Street/Old Highway 49 South and the Illinois Central Railroad tracks. See the attached map for the exact site location.

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- Project Name/Task Order Number
- Date Drummed: MM-DD-YY
- Origin of the waste: (i.e., Boring Number)
- Media
- Name of individual who completed the label
- Telephone number of contact person

Arranging disposal of all IDW will be the responsibility of TN&A. TN&A will follow all of the requirements of the QAPP for disposal of all IDW generated during this field effort.



## SUBCONTRACT/SERVICES PRICING FORM

Offeror submits the following prices to T N & Associates, Inc. (TN&A) for performing all work described in the Statement of Work and technical specifications. Prices shall include, but not be limited to, furnishing all plant, labor, technical, and professional services, supervision, materials, tools, equipment, applicable taxes, any necessary work permits, and any and all operations necessary or required to accomplish the work. Offeror's pricing proposal shall be completed, executed, and dated or the offer may be deemed non-responsive.

Offeror's proposal price shall also include the following required items:

Offeror shall  shall not  be required to provide **100% Performance and Payment Bonds**, each in an amount equal to the total compensation under any resultant Subcontract as security. Offeror's proposal shall include the price of any required bonds.

The **Davis-Bacon Act**  or the **Service Contract Act**  will apply to any resultant Subcontract. Applicable Davis-Bacon wage rates are available at <http://www.wdol.gov/dba.aspx> or upon request from TN&A. Offeror's proposal shall include all applicable wage rates.

**Payment terms** under any resultant Subcontract will be payment within seven (7) days after Buyer receives payment of the approved invoice amount from the Client.

Subcontractor shall maintain the following **insurance** under any resultant Subcontract:

- a. **Workers' Compensation** – Statutory coverage. If applicable, coverage must include U.S. Longshore and Harbor Workers' Act and/or Maritime Coverage endorsements which should be noted on the certificate.
- b. **Employer's Liability** - \$1,000,000 bodily injury by accident – each accident; \$1,000,000 bodily injury by disease – policy limit; \$1,000,000 bodily injury by disease – each employee.
- c. **General Liability** - \$1,000,000 each occurrence, \$2,000,000 aggregate including per project aggregate limits.
- d. **Automobile Liability** - \$1,000,000 combined single limit including owned, non-owned, and hired vehicles. If any hazardous substances are transported must include a MCS-90 endorsement and Motor Carriers Act of 1980 coverage applicable in the jurisdiction where the operations of the insured are performed.
- e. **Professional Liability** - \$1,000,000 each claim. Required if performing professional services, including but not limited to, laboratory, engineering, and other technical services.
- f. **Pollution Liability** - \$1,000,000 per occurrence. Required if Work involves invasive work or hazardous substances, including but not limited to field services and drilling, and transportation and disposal services. If the Work includes asbestos abatement, mold, mildew or fungus, these must be specifically included and referenced on the certificate.

**Proposal Acceptance:** If Offeror's proposal is accepted within 90 calendar days from the date below, Offeror agrees to furnish any or all items/services as proposed.

Item Number	Item Description	Est. Qty.	Unit	Unit Price	Extended Price
1	Mobilization and demobilization of equipment and personnel	1	Lump sum	\$	\$
2	Temporary Well Installation with Geoprobe per SOW and EISOPQAM	400'	Per Foot	\$	\$
3	Well Abandonment of temporary wells (per state requirements)	400'	Per Foot	\$	\$
4	Temporary Decontamination Pad	1	Each	\$	\$
5	Decontamination/IDW Management		Hr	\$	\$
6	Well Development		Hr	\$	\$
7	Teflon-lined tubing (400 feet for the peristaltic and 400 feet for the grundfos), Peristaltic pump, Grundfos pump, and water level indicator for sampling	1	LS	\$	\$
8	Per Diem (2 Man Crew)	5	Night	\$	\$
9	55 Gallon Drums	6	Each	\$	\$

Company Name: \_\_\_\_\_

Authorized Signature: \_\_\_\_\_

Printed Name/Title: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

E-mail: \_\_\_\_\_ Taxpayer Identification Number: \_\_\_\_\_

Date: \_\_\_\_\_



Webster.Donna@epamail.ep  
a.gov

09/11/2007 08:37 AM

To awarrington@tnainc.com

cc Robert\_Huckaby@deq.state.ms.us

bcc

Subject Contacts for Red Panther sampling

Allyson,

Here are the people I have contacted to arrange for access for the Red Panther SI, and the status. I let them each know that you or someone from T.N. & A. would be contacting them about specific arrangements. Coahoma Warehousing does not have anyone on site, but they do have a person in the area with a key who can let everyone in when the time comes.

Property Owner:

Gary Lowe  
Coahoma Warehousing  
P.O. Box 1239  
LaVergne, TN 37086  
(615) 287-8876  
fax (800) 793-8448  
(Spoke with him on Sept. 10 and faxed access letter to him)

Municipal Wells:

Chuck Williams  
Clarksdale Public Utilities  
(662) 627-8499  
fax (662) 627-8463  
(Spoke with him on Sept. 5 and faxed access letter to him. Signed form received by fax Sept. 7).

Richard Antici  
City of Lyon  
(662) 645-0646  
fax (662) 627 - 1600  
(Spoke with him on Sept. 10, faxed access letter on Sept. 11)

I'll let you know when all the signed forms are in.

Donna K. Webster  
Remedial Project Manager  
Superfund Site Evaluation Section  
US EPA, Region 4  
(404) 562 - 8870



"Allyson Warrington"  
<awarrington@tnainc.com>  
08/24/2007 01:22 PM

To <Robert\_Huckaby@deq.state.ms.us>  
cc  
bcc  
Subject RE: TNA-05-003-0004\_Red Panther SAP

Hi Robert,

I just wanted to follow up with you about Red Panther. Have you had a chance to look at my Sampling Plan? I welcome any comments that you may have. Donna is out of town, and won't return to the office until Monday. However, upon her return, I'd like to discuss the SAP and get it "on the books" for field work. Let me know when you're available.

Thanks!  
Allyson

---

**From:** Limari Krebs  
**Sent:** Wednesday, August 15, 2007 9:54 AM  
**To:** robert\_huckaby@deq.state.ms.us  
**Cc:** webster.donna@epa.gov; Allyson Warrington  
**Subject:** TNA-05-003-0004\_Red Panther SAP

Dear Mr. Huckaby:

Per Ms. Donna Webster's request at the EPA, I am forwarding to you an electronic copy of the Red Panther Site Sampling and Analysis Plan (SAP) Rev. 0 including the figures and tables. Please let me know if you are unable to view the attachments.

Regards,

Limari F. Krebs  
*Senior Scientist, START Region IV*

**T N & Associates, Inc.**

1220 Kennestone Cir. • Ste. D • Marietta, Georgia 30066  
Office: 678-355-5550 ext. 5703 • Cell: 404-729-5542 • Fax: 678-355-5545  
Email: [lkrebs@tnainc.com](mailto:lkrebs@tnainc.com) • Web: [www.tnainc.com](http://www.tnainc.com)



"Allyson Warrington"  
 <awarrington@tnainc.com>  
 08/24/2007 02:26 PM

To <Robert\_Huckaby@deq.state.ms.us>  
 cc <Webster.Donna@epamail.epa.gov>  
 bcc

Subject RE: Red Panter Site Sampling Plan Review

Thank you very much for your comments!

I would like to discuss #1 and #2 with both you and Donna since costs, etc. is ultimately up to EPA. Based on the information TN&A was provided by EPA (file material), a 6000 series Geoprobe will be sufficient for the field activities. I agree...a back-up plan for drilling activities should be discussed for a worst-case scenario. (In most cases, if the site's file material is not sufficient to make an educated decision, TN&A would look to MDEQ to advise us on the lithology of the area based on MDEQ's previous projects.)

The answers to #3 and #4 are detailed in our Request for Proposal (RFP) for drilling services, and a copy is sent to EPA when we request subcontractor consent. I have not yet written the RFP for Red Panther, but plan to do so at the beginning of the week. Specific procedures for drilling and abandonment are included in the RFP; however, the EISOPQAM is followed as required. I will include more detail in the Sampling Plan and can resubmit as the SSP Rev. 1, once we all have discussed the answers to your questions.

Thanks again,  
 Allyson

-----Original Message-----

----- Forwarded by Robert Huckaby/HW/OPC/DEQ on 08/24/2007 01:24 PM  
 -----

Robert  
 Huckaby/HW/OPC/DE  
 Q  
 To Donna Webster  
 08/22/2007 08:30  
 cc AM Phillip Weathersby/HW/OPC/DEQ@DEQ  
 Subject Red Panter Site Sampling Plan  
 Review

Donna,

I have reviewed the "Site Sampling Plan" for the Red Panther facility and have the following comments.

- 1) What is the contingency plan if the Geoprobe 6000 is unable to reach groundwater? Will a conventional drill rig be brought in to install the wells?
- 2) If a conventional drill rig is needed to install the wells, will the increased cost of well installation cause a reduction in the number of wells to be installed?
- 3) The MDEQ would like to see more specific information regarding the installation and construction of the proposed temporary monitoring wells.
- 4) Information regarding the abandonment of these wells should be included in this plan.

Thanks,  
Robert

Robert  
Huckaby/HW/OPC/DEQ  
08/22/2007 08:30 AM

To webster.donna@epa.gov  
cc Phillip Weathersby/HW/OPC/DEQ@DEQ  
bcc  
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