



Mixon Brothers Wood Preserving, Inc.

P.O. Box 327
Idabel, OK, 74745
Phone: (580) 286-9494

RECEIVED

AUG 16 2024

LAND PROTECTION DIVISION
DEPT. OF ENVIRON. QLTY

August 13, 2024

CERTIFIED MAIL

Ms. Kelly Dixon, Division Director
Land Protection Division
Oklahoma Department of Environmental Quality
707 North Robinson, P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677

Re: Technical Review of Application for Renewal of Post-Closure Operations Permit
Number 007336258PC, Mixon Brothers Wood Preserving, Inc.

Dear Ms. Dixon:

In response to your letter, dated February 29, 2024, Mixon Brothers Wood Preserving, Inc. (MBWP) appreciate your patience in our responses concerning the Notice of Deficiency (NOD). In addition, several of the concern items have already been submitted in response to the NOD, such as several items from the previous renewal applications. Security for the facility is maintained with the utilization of security cameras and combined with a series of alarm systems as well as barricades to closed impoundments. Information regarding the previous Renewal application has already been submitted. Even though the Preparedness and Plans dated September 29, 2014, changes have been made to certain information in the Plans which are routinely updates with new information. The Plan listed Emergency Response Contacts which includes the Oklahoma Department of Environmental Quality, Land Protection Division. The Plan requires the Operations Manager to: **"Notify the Regional Administrator and appropriate state and local authorities in the event that the local emergency services have been required . . ."** In additional, the Post-Closure Operations Permit also listed the reporting requirements. Attached is the Topographic map requested. In the Section 19.6, Section 3 and 19.5 (characterization of the contaminated ground water and also listed MCL for PCP) will be listed as references. Section 19.2 of the application refer to the Appendices of the previous Renewal Application and that information Appendices has already been submitted. Naphthalene has never been detected in the ground water or listed in any documents as a constituent of concern. It was MBWP's understanding that if naphthalene was not detected that naphthalene would not be included in the renewal permit. MBWP will correct to include PZ-5 and PZ-9. It was MBWP's understanding that if PZ-2 did not detect contamination to the ground water that PZ-2 sampling would not be included in the renewal permit. However, MBWP will include sampling of PZ-2 and/or analyzed for naphthalene, if it will be included as a supplement or amendment to the application in order to addresses the NOD. MBWP will correct the typo to include CW-3 and replace with attached correct page 22. It's possible to ensure that all items in the NOD are addresses into a supplement or amendment to the application

If you have any questions, or comments, please call me at (580) 286-9494.

Sincerely,

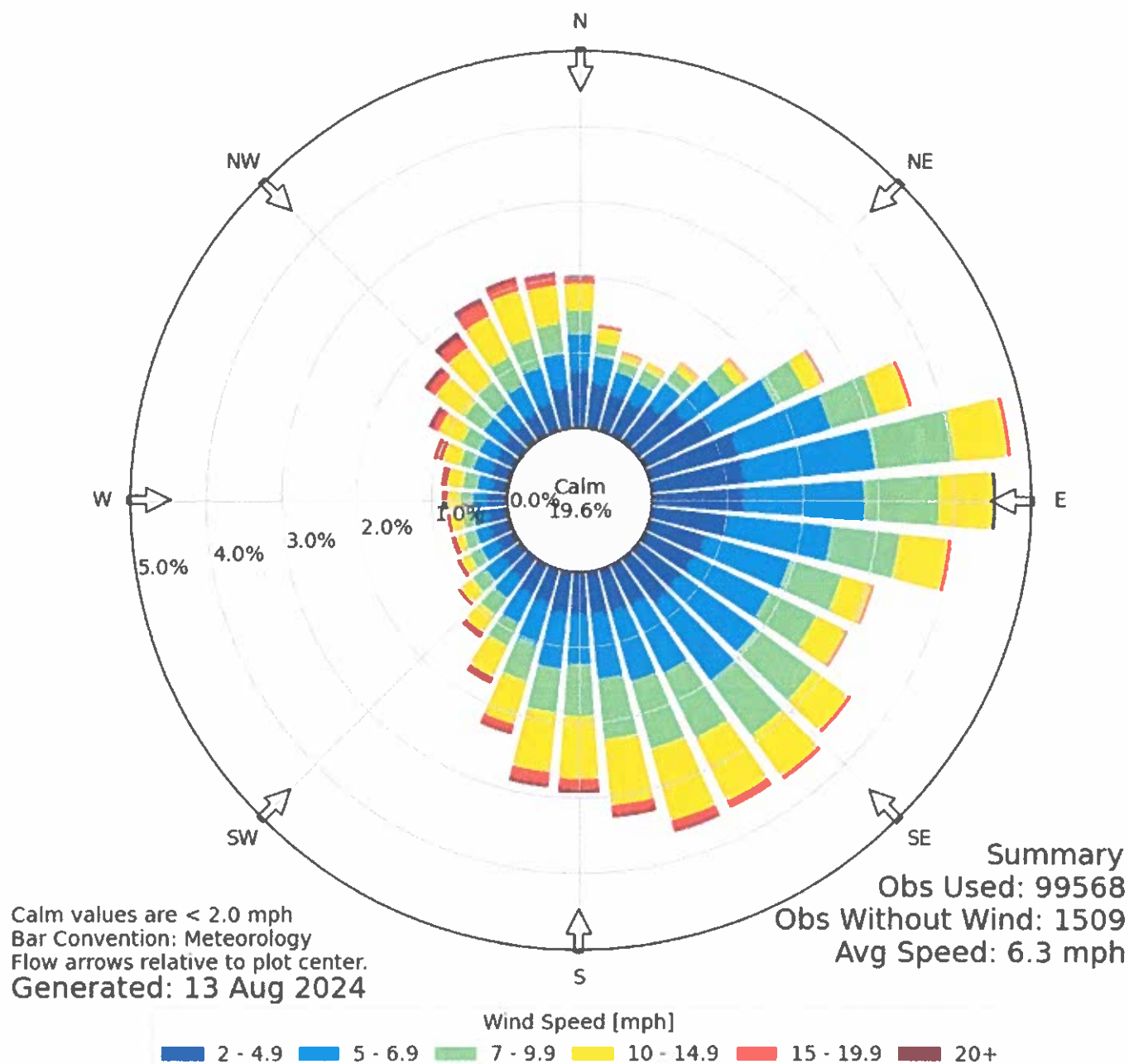
Bob Mixon

Attachments: Topographic Map, List of Appendices from previous application, and corrected page 22



Windrose Plot for [404] Idabel

Obs Between: 01 Jan 2013 12:55 AM - 12 Aug 2024 11:55 PM America/Chicago



IOWA STATE
UNIVERSITY

College of Ag

Department of Agronomy

Intervals including the Tolerance Intervals on Compliance Limits and Confidence Interval will be based on the analytical results. In addition, the background well will be evaluated with compliance well utilizing the T-Test and Wilcoxin Rank-Sum Test.

19.7 Corrective Action Program (40 CFR 270.14(c)(8))

After PCP was detected in PZ-4, 6, and 7, MBWP initiated dewatering of these wells to prevent the migration of PCP Plume. Since later testing of the surrounding groundwater with PZ-5, 8, 9, and 10 indicated the extent of the plume is localized to the immediate area of PZ-4, PZ-6, and PZ-7. Monitor Wells PZ-2, PZ-3, PZ-4, PZ-5, PZ-6, PZ-7, PZ-8, PZ-9, PZ-10, CW-1, CW-2, and CW-3 will be measured annually for water elevation. The water elevation of the wells will be utilized to determine the groundwater flow rate and direction in the uppermost aquifer and to verify the effectiveness of mitigating the PCP plume.

In April 2000, MBWP sampled PZ-5 and PZ-8, annually and analysis indicated no detectable concentrations of Naphthalene and PCP. Analytical results of samples collected from PZ 4, 6, and 7 indicated an initial decrease in the PCP concentrations (Table 19.7 refer to the prior renewal application). During February and August 2005, sampling was conducted of 9 monitor wells and two borings and indicated PCP plume is being contained by the dewatering of these wells (Appendix V and W refer to the prior renewal application).

20.0 Drip Pad (40 CFR 270.26)

20.1 List of Hazardous Wastes (40 CFR 270.26(a))

MBWP installed a new creosote drip pad in 1992 and continued to be utilized during the creosote wood preserving process (Appendix R refer to the prior renewal application).

20.2 Plan and Engineering Report (40 CFR 270.26 9(c)(1) - (16))

MBWP Assessment of the Creosote Plant including the Design and Installation of the New Drip Pad dated July 31, 1992, Appendix R refer to the prior renewal application contains the report which meets the requirement of 40 CFR