



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

*PDF'd to
Tim
Hassett
on 8/25/11*

AUG 25 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Karen Murphy
Vice President, Environmental Health and Safety
Ashland, Inc.
1313 N. Market Street
Wilmington, Delaware 19894

Subject: Review of Phase I Sampling and Analysis Work Plan dated July 14, 2011
Hercules Inc.
Hattiesburg, MS
MSD 008 182 081

Dear Ms. Murphy:

The EPA and Mississippi Department of Environmental Quality (MDEQ) have reviewed the above referenced document in accordance with the requirements of the RCRA 3013(a) Administrative Order (AO), Docket No. RCRA-04-2011-4251, and other pertinent RCRA policies and guidelines for environmental investigations. General comments regarding this document are enclosed. In accordance with Paragraph 88 of the AO, and as discussed with you on August 17, 2011, EPA **disapproves** this submission and directs Hercules to resubmit the document after incorporating the enclosed comments.

Overall, EPA and MDEQ feel that the Phase I Sampling and Analysis Work Plan (Work Plan) does not present a detailed sampling and analysis approach as required by the AO. Instead, a general decision framework is presented that does not include the number and locations of samples to be collected or adequate detail concerning the evaluation of environmental media in the vicinity of the Hercules site. A revised submittal should include the detail requested by the AO and the enclosed general comments. Detailed technical comments will be sent to Tim Hassett, Hercules Project Coordinator, under separate cover from Meredith Anderson, RCRA Corrective Action Project Coordinator, by August 30, 2011. Revisions to the Work Plan should address the comments presented in this correspondence, as well.

Pursuant to the AO, Hercules has fifteen (15) calendar days to modify and resubmit the Work Plan to EPA for final review (Paragraph 90). However, as we discussed, and since detailed comments will be transmitted to you on August 30, 2011, please submit a revised Phase I Work Plan by September 19, 2011. If EPA determines that the revised submittal still fails to meet the requirements of this AO, EPA may modify the submission and finalize and approve the Work Plan for implementation by Hercules (see Paragraph 91).

Meredith Anderson and I are available to meet with you and your team to discuss these comments in detail. You may contact me at 404-562-8885 or knight.karen@epa.gov to discuss this letter or set up a meeting or conference call.

Sincerely,

Handwritten signature of M.C. Anderson in black ink.

D. Karen Knight, CHMM
Chief, Corrective Action Section
RCRA Division

Enclosure

cc: Jerry Banks, MDEQ
Tim Hassett, Ashland/Hercules
Melissa McGee-Collier, MDEQ
Willie McKercher, MDEQ
Chris Sanders, MDEQ
Rick Sumrall, MDEQ
Chris Wells, MDEQ

ENCLOSURE

**Phase I Sampling and Analysis Work Plan, July 14, 2011
Hercules Inc.
Hattiesburg, MS
MSD 008 182 081**

General Comments:

1. The Hercules Phase I Sampling and Analysis Work Plan (Work Plan) does not present a detailed sampling and analysis approach as required by the Administrative Order (AO). The Work Plan is a general decision framework that does not include the number and locations of samples to be collected or adequate detail concerning the evaluation of environmental media in the vicinity of the Hercules site.

The Work Plan does not describe previous investigations well enough, or interpret existing data clearly enough, to determine whether the activities presented in the Work Plan are adequate to show that the objectives of the Work Plan (as stated on page 13) can be achieved. No maps showing groundwater flow directions (in the shallow and deep zones), groundwater contamination plume diagrams, or contamination trend graphs are presented. A recent water level contour map should be the base map for these plume maps so groundwater flow directions relative to the plumes, the property boundaries, source areas, and the surface water drainages can be easily determined, and the locations of ground water, surface water, sediment, and soil gas monitoring along the flow paths to the groundwater discharge areas can be demonstrated.

2. Throughout the Work Plan, Hercules describes its intentions to pursue access to properties that may be necessary for site investigations. In its role as lead in Community Engagement, MDEQ will review all written communications distributed to the public prior to distribution. MDEQ and EPA must also be copied on all written communications distributed to the public. This will include, but not be limited to, copies of all access agreements and water well data forms.
3. A comprehensive list of constituents of concern (COCs) for this AO investigation should be proposed by Hercules and approved by EPA and MDEQ. The process that will be utilized to develop this COC list should be based on the most current EPA RSLs or MDEQ TRGs (whichever is lower) and should be discussed in more detail in the Work Plan and built into the early stages of the project schedule. Additionally, the corresponding 10-6 RSLs/TRGs for each COC will be used for screening purposes throughout this investigation, not 10-4 or 10-5 risk level.
4. The AO requires sampling of drinking water wells and soil gas sampling on or within a half-mile radius of the Hercules site. Therefore, all wells identified through the public records search or the well inventory that are on or within this radius (including on-site wells) are required to be sampled during Phase I. The Work Plan should reflect this requirement (in the text as well as the decision logic process illustrated in Figure 7). Well depth, well construction, and depth to water measurements from these wells, along with the results of chemical analyses, are valuable information to determine whether the deeper aquifer in the vicinity of the facility has been contaminated and should, therefore, also be collected during this sampling activity.

Additionally, all samples from wells used as a drinking water source must be analyzed using an EPA-approved drinking water method, if available.

Similarly, a detailed sampling and analysis plan for soil gas sampling within a half mile radius of the site should be presented in the text and in the decision logic process for soil gas sampling (Figure 10). The decision logic presented in Figures 7 and 10 should be revised to reflect these requirements and would then apply to determining the sampling process outside the half-mile radius.

5. It is stated that "current data indicate that VOCs in shallow groundwater are not migrating off-site..." (Section 6.4.1, p. 23). Existing data does show that currently contaminated groundwater is migrating off-site and entering the City of Hattiesburg sewer system at Providence Street. Hercules should specifically address how they plan to assess potential migration of contaminants through the public utility corridors beneath Providence Street that have already shown signs of impact. Also, if there is additional data that indicates that VOCs have not migrated off-site in other areas of interest, Hercules should present that data in the Work Plan to substantiate the statement.
6. Reporting limits for all constituents must be at or below RSLs/TRGs. If a reporting limit is above an RSL or TRG for a particular chemical, it is to be assumed that the chemical is present in the sample, and this chemical will continue to be evaluated as a constituent of concern for this AO.
7. The AO states that Hercules shall submit all data for this investigation consistent with the EPA Region 4 electronic data deliverables (EDD) policy (Paragraph 81), and this should be stated clearly in the main body of the Work Plan (not only in the QAPP). The EPA format is significantly different from the standard EQUIS format presented in Appendix A of Appendix C, EQUIS Lab SOP, and modification to data in the database will therefore need to be performed in order to submit data to EPA and MDEQ. When data is submitted to EPA through the EPA Region 4 DART System (per the EPA Region 4 EDD policy), all databases are electronically scanned for completeness and consistency and are returned automatically if they fail the data checker process. EDD support can be found at the following website:
<http://epa.gov/region4/waste/sf/edd/edd.html>.
8. All sampling and handling procedures throughout this investigation must be conducted in accordance with EPA Region 4 Field Branches Quality Systems and Technical Procedures, as applicable. These procedures can be found at:
<http://www.epa.gov/region4/sesd/fbqstp/index.html>. Discussion of the sampling procedures for each media should be referenced correctly; for instance, groundwater sampling should reference the procedures in SESDPROC-301-R1, not the drinking water well sampling procedures SESDPROC-305-R1 (page 21). Similar incorrect references can be found for soil gas and ambient air sampling (pages 24 and 26). All decontamination procedures should be consistent with SESDPROC-205-R1. Lastly, for all media, where conflicts exist between the SESD reference documents and the corresponding ARCADIS SOPs, the SESD procedures will prevail.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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AUG 25 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Karen Murphy
Vice President, Environmental Health and Safety
Ashland, Inc.
1313 N. Market Street
Wilmington, Delaware 19894

Subject: Review of Phase I Sampling and Analysis Work Plan dated July 14, 2011
Hercules Inc.
Hattiesburg, MS
MSD 008 182 081

Dear Ms. Murphy:

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Pursuant to the AO, Hercules has fifteen (15) calendar days to modify and resubmit the Work Plan to EPA for final review (Paragraph 90). However, as we discussed, and since detailed comments will be transmitted to you on August 30, 2011, please submit a revised Phase I Work Plan by September 19, 2011. If EPA determines that the revised submittal still fails to meet the requirements of this AO, EPA may modify the submission and finalize and approve the Work Plan for implementation by Hercules (see Paragraph 91).

ENCLOSURE

Phase I Sampling and Analysis Work Plan, July 14, 2011
Hercules Inc.
Hattiesburg, MS
MSD 008 182 081

General Comments:

1. The Hercules Phase I Sampling and Analysis Work Plan (Work Plan) does not present a detailed sampling and analysis approach as required by the Administrative Order (AO). The Work Plan is a general decision framework that does not include the number and locations of samples to be collected or adequate detail concerning the evaluation of environmental media in the vicinity of the Hercules site.

The Work Plan does not describe previous investigations well enough, or interpret existing data clearly enough, to determine whether the activities presented in the Work Plan are adequate to show that the objectives of the Work Plan (as stated on page 13) can be achieved. No maps showing groundwater flow directions (in the shallow and deep zones), groundwater contamination plume diagrams, or contamination trend graphs are presented. A recent water level contour map should be the base map for these plume maps so groundwater flow directions relative to the plumes, the property boundaries, source areas, and the surface water drainages can be easily determined, and the locations of ground water, surface water, sediment, and soil gas monitoring along the flow paths to the groundwater discharge areas can be demonstrated.

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STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 12, 2011

Meredith Anderson
Environmental Engineer
RCRA Div/Corrective Action Section
EPA-Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

FILE COPY

Re: MDEQ Comments for Phase I Sampling and Analysis Work Plan dated July 14, 2011

Hercules Inc. Hattiesburg facility
Hattiesburg, Forrest County, Mississippi

Dear Ms. Anderson:

The Mississippi Department of Environmental Quality (MDEQ) has completed a review of the above referenced document and has the following comments:

1. A general comment regarding the document is that this is not what was expected for submittal. Instead of a detailed sampling and analysis work plan, this document reads as a general framework document providing little or no detail on locations and numbers of samples to be collected. Several tiered approaches are proposed with no prescribed starting points. The requested revision should provide those details.
2. Section 2.3, Page 6 reads, "Since 2007, Hercules has conducted groundwater sampling and submitted routine groundwater monitoring reports to MDEQ in accordance with the RUAO. To date, after 5 years of monitoring, COC concentrations have not changed at the Site to warrant implementation of contingency plans called for in the Remedial Action Plan." Investigations at the site prior to the Remedial Action Plan and RUAO did not take into account current conditions compounded by the impoundment basin and its off-site potential. As it may be correct that there have been no significant changes in the previously identified COCs, recent sampling showing the concentrations and locations of COCs call for modification of the outdated Conceptual Site Model.
3. Section 3.4.3, page 11 reads, "The Site is inactive and thus exposure of current Site workers is not expected to be significant:..." The facility is inactive yet maintains a skeleton maintenance staff which remains active at the facility.

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

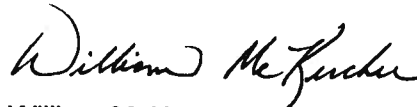
AN EQUAL OPPORTUNITY AGENCY

4. Section 6.1.2 – Hercules describes its intentions to pursue access to properties that may be necessary for site investigation. In its role as lead in Community Engagement, MDEQ will review all written communications distributed to the public prior to distribution. MDEQ must also be copied on all written communications distributed to the public. This will include, but not be limited to, copies of all access agreements and water well data forms.
5. Section 6.1.2, page 15 contains a table describing a tiered approach to sampling existing groundwater use wells within the 0.5 mile radius of the property. The May 9, 2011 Administrative Order issued by Region 4 USEPA called for sampling of all groundwater use wells within the 0.5 mile radius of the property. The decision to reduce that sampling requirement must be approved by USEPA. At a minimum, MDEQ would require that wells listed by Hercules, Inc as having a priority rating of 1, 2 & 3 be sampled as part of the initial round of sampling.
6. Figure 5 indicates that there are at least six groundwater extraction wells located within the facility boundaries that were historically utilized as supply wells for the facility. As described by Hercules, Inc. during the meeting in Atlanta, these are deep wells that penetrate the underlying Hattiesburg Clay Formation and represent a potential conduit for contamination. As these wells represent a threat to the deeper drinking water aquifer and provide potential for unidentified off-site contamination, MDEQ requires that these wells be sampled as part of the initial round of sampling.
7. Section 6.2.1, page 18 reads, "Sampling will not be performed in closed culverts or conveyances that are not readily accessible and open to the surface." The drainage pathway labeled on Figure 5 as "Drainage C" was an open ditch for decades prior to the water being routed into culverts on its way to the Bouie River. MDEQ will require that subsurface soil samples be collected along "Drainage C" from native soils that would have served as the basin of the drainage pathway. One sample per 500 feet minimum, bottom and sidewall.
8. Section 6.3 – This section provides no detail for the monitoring wells. MDEQ wants to see this written as a sampling plan detailing the number of wells per area of interest with the proposed locations and construction details.
9. Section 6.4.1, page 23 reads, "Groundwater SLs were calculated corresponding to a target cancer risk level of 1×10^{-6} (1 in 1,000,000) or a Hazard Quotient (HQ) of 0.1 for screening purposes, although the entire Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) target risk range (1×10^{-4} to 1×10^{-6}) and an HQ of 1 will be considered prior to sampling additional environmental media." As these screening levels will be utilized in the decision matrix for additional sample collection on off-site properties not owned by Hercules, Inc., the residential numbers calculated in Table 4. *Results of Initial Groundwater Screening – GW to IA Screen, 1×10^{-6}* , will be utilized as the screening levels for all off-site groundwater investigation. Should contaminants be identified that are not listed on Table 4, then the appropriate screening levels will be calculated in the same manner.

10. Section 6.4.1, page 23 also reads, "As noted above, although current data indicate that VOCs in shallow groundwater are not migrating off site, shallow groundwater samples will be collected as described in Section 6.3 until concentration are below either the calculated groundwater SLs or the MCLs, whichever is greater." Existing data does show that currently contaminated groundwater is migrating off site and entering the City of Hattiesburg sewer system at Providence Street. MDEQ requests that Hercules, Inc. address specifically how they plan to assess potential migration of contaminants through the public utility corridors beneath Providence Street that have already shown signs of impact.
11. Section 6.5.1, page 24 routes the user to Figure 10 for the Decision Flow Chart For Soil Gas and Vapor Intrusion. MDEQ recommends modification of the flow chart to remove J&E Modeling. Given the relatively shallow depth to groundwater, once groundwater is delineated to screening levels and buildings are identified within a distance of 100 feet, Hercules, Inc. should immediately move to collection of soil gas samples.
12. Section 6.5.2 – Soil Gas Sampling Procedures directs users to Appendix K for soil gas sampling standard operating procedures. However, Appendix K only addresses collection of sub-slab soil gas, indoor air and ambient air samples. It does not address the procedures for the soil gas sampling proposed in the document.
13. At the time of soil gas sampling, Hercules, Inc. and their contractors should collect construction details of potentially affected homes to determine if they are slab on grade, ventilated crawlspace, etc. for use in future assessments.

If you have any questions or comments, please contact me at (601) 961-5731.

Sincerely,



William McKercher, P.E.
Project Manager
Groundwater Assessment and
Remediation Division (GARD)

cc: Chris Sanders, P.E. – MDEQ, ECED
Jerry Banks, P.E. – MDEQ, GARD



Hercules Incorporated
Hercules Plaza
1313 N. Market Street
Wilmington, DE 19894

July 14, 2011

VIA FEDERAL EXPRESS – OVERNIGHT DELIVERY

Mr. Larry Lamberth
Chief, South Section
RCRA and OPA Enforcement and Compliance Branch
RCRA Division
United States Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

RECEIVED
JUL 15 2011

DEQ-ECED

Ms. D. Karen Knight
Chief, Corrective Action Section
Restoration and Underground Storage Tank Branch
RCRA Division
United States Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

Mr. Chris Sanders
Chief, Environmental Compliance and Enforcement Division
Mississippi Department of Environmental Quality
515 Amite Street
Jackson, Mississippi 39201

**Subject: Submission of Phase I Workplan for Administrative Order
Hercules Incorporated, Hattiesburg Facility
Hattiesburg, Forrest County, Mississippi
USEPA ID No. MSD 008 182 081
Docket No. RCRA-04-2011-4251**

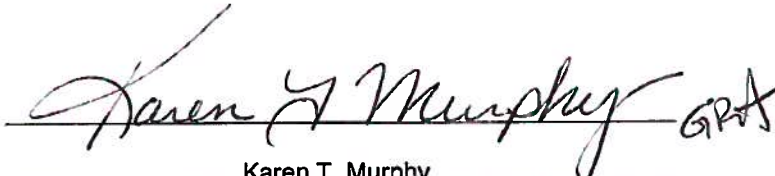
Dear Ms. Knight, Mr. Lamberth, and Mr. Sanders:

Hercules Incorporated hereby submits the attached Phase I Sampling and Analysis Work Plan pursuant to Paragraph 74 of the Administrative Order (Order) received from the U.S. Environmental Protection Agency (USEPA) on May 10, 2011. As discussed in the June 9, 2011 meeting, the Phase I Work Plan incorporates elements of the Phase II activities identified in Paragraph 75 of the Order.

As specified in Paragraph 95 of the Order, the following certification is made:

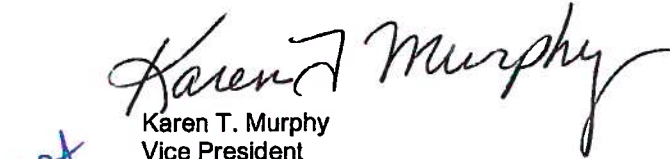
I certify that the information contained in and accompanying this submission is true, accurate, and complete. As to those identified portions of this submission for which I cannot personally verify the truth and accuracy, I certify as the facility official having supervisory responsibility for the person who, acting upon my direct instructions, made the verification, that this information is true, accurate, and complete.

Mr. Larry Lamberth
Ms. D. Karen Knight
Mr. Chris Sanders
July 14, 2011
Page 2

Signature: 
Name: Karen T. Murphy
Title: Vice President, Environmental Health & Safety, Ashland Inc.

If there are any questions concerning this submittal, please contact Hercules Project Coordinator Mr. Timothy Hassett at (302) 995-3456.

Sincerely,


Karen T. Murphy
Vice President
Environmental Health & Safety
Ashland, Inc.

KTM/TDH/cep

cc: Meredith C. Anderson – EPA Region IV, Atlanta, GA
Javier E. Garcia – EPA Region IV, Atlanta, GA
Bruce J. Hough – Ashland/ Hercules, Wilmington, DE
Rodney Bolton – Ashland/ Hercules, Milwaukee, WI
Kristina Woods – Ashland/ Hercules, Dublin, OH
John Ellis – ARCADIS/ Baton Rouge, LA

bcc: Gary Allen – Ashland/ Hercules, Dublin, OH
Jim Vitak – Ashland/ Hercules, Dublin, OH
Gary Rikard – Butler Snow, Memphis, TN

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
P.O. BOX 2339
JACKSON, MS 39225

**** INVOICE****
**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM****

HERCULES INCORPORATED (ASHLAND INC)
ATTENTION: TIM HASSETT
500 HERCULES ROAD
WILMINGTON, DE 19808-1599

INVOICE #: VEP-00004582
DATE: 10-19-2011

FINANCIAL:
AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:
TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470039
CUSTOMER PO# 4500777456

Date Due: 11-18-11

Please include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
SEPTEMBER 2011 / W. MCKERCHER - DIVISION 4047	7	STAFF HOUR(S)	100.00	\$700.00
TOTAL AMOUNT DUE				\$700.00

Hercules Incorporated
50 E. RiverCenter Blvd.
P.O. Box 391
Covington, KY 41012

10018070
Page 1 of 1
DATE 10/06/2011

Vendor Number 0002067579	Hercules Incorporated	Check Number 10018070		
Reference Number VEP00004539 40470039	Credit Amount	Invoice Amount 550.00	Discount Amount .00	Net Amount 550.00

FOR SECURITY PURPOSES, THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK

Hercules Incorporated
50 E. RiverCenter Blvd.
P.O. Box 391
Covington, KY 41012

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ATLANTA

10018070
64-79 / 611

VOID VOID

DATE
10/06/2011

AMOUNT
\$*****550.00

PAY EXACTLY Five Hundred Fifty And No/100 Dollars

VOID AFTER 180 DAYS

TO THE
ORDER OF

MISSISSIPPI DEPT OF ENVIRONMENTAL
QLTY
PO BOX 2339
JACKSON, MS 39225-2339

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AUTHORIZED SIGNATURE



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OCT 11 2011
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STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
P.O. BOX 2339
JACKSON, MS 39225

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM****

HERCULES INCORPORATED (ASHLAND INC)
ATTENTION: TIM HASSETT
500 HERCULES ROAD
WILMINGTON, DE 19808-1599

INVOICE #: VEP-00004539
DATE: 09-20-2011

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470039
CUSTOMER PO# 4500777456

Date Due: 10-20-11

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DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
AUGUST 2011 / W. MCKERCHER - DIVISION 4047	5.5	STAFF HOUR(S)	100.00	\$550.00
TOTAL AMOUNT DUE				\$550.00

Hercules Incorporated
50 E. RiverCenter Blvd.
P.O. Box 391
Covington, KY 41012

10017705
Page 1 of 1
DATE 09/27/2011

Vendor Number 0002067579	Hercules Incorporated		Check Number 10017705		
Reference Number 40470039	Credit Amount	Invoice Amount	Discount Amount	Net Amount	
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FOR SECURITY PURPOSES, THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK

Hercules Incorporated
50 E. RiverCenter Blvd.
P.O. Box 391
Covington, KY 41012

SUNTRUST BK
ATLANTA

10017705
64-79 / 611

DATE
09/27/2011

AMOUNT
\$*****1,650.00

PAY EXACTLY One Thousand Six Hundred Fifty And No/100 Dollars

VOID AFTER 180 DAYS

TO THE ORDER OF MISSISSIPPI DEPT OF ENVIRONMENTAL
QLTY
PO BOX 2339
JACKSON, MS 39225-2339

135


AUTHORIZED SIGNATURE

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SEP 29 2011
MS DEPT. OF ENVIRONMENTAL QUALITY
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STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
P.O. BOX 2339
JACKSON, MS 39225

**** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM****

HERCULES INCORPORATED (ASHLAND INC)
ATTENTION: TIM HASSETT
500 HERCULES ROAD
WILMINGTON, DE 19808-1599

INVOICE #: VEP-00004506
DATE: 08-18-2011

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470039
CUSTOMER PO# 4500777456

Date Due: 09-17-11

Please Include Customer # on check made payable to MDEQ

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
JULY 2011 / W. MCKERCHER - DIVISION 4047	16.5	STAFF HOUR (S)	100.00	\$1,650.00
TOTAL AMOUNT DUE				\$1,650.00

Hercules Incorporated
50 E. RiverCenter Blvd.
P.O. Box 391
Covington, KY 41012

10015998
Page 1 of 1
DATE 08/05/2011

Vendor Number 0002067579	Hercules Incorporated		Check Number 10015998	
Reference Number VEP00004360 4468 40470039	Credit Amount	Invoice Amount 200.00	Discount Amount .00	Net Amount 200.00

FOR SECURITY PURPOSES, THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK

Hercules Incorporated
50 E. RiverCenter Blvd.
P.O. Box 391
Covington, KY 41012

SUNTRUST BK
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10015998
64-79 / 611

DATE
08/05/2011

AMOUNT
\$*****200.00

PAY EXACTLY Two Hundred And No/100 Dollars

TO THE
ORDER OF

MISSISSIPPI DEPT OF ENVIRONMENTAL
QLTY
PO BOX 2339
JACKSON, MS 39225-2339

108

VOID AFTER 180 DAYS


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⑈ 10015998⑈ ⑆ 061100790⑆



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

** INVOICE **

** UNCONTROLLED SITES VOLUNTARY EVALUATION PROGRAM **

HERCULES INCORPORATED (ASHLAND INC)
ATTENTION: TIM HASSETT
500 HERCULES ROAD
WILMINGTON, DE 19808-1599

INVOICE #: VEP-00004468
DATE: 07-21-2011

FINANCIAL:

AVELEKA MOORE - (601) 961-5031
ACCOUNTS_RECEIVABLE@DEQ.STATE.MS.US

ENGINEER:

TONY RUSSELL - (601) 961-5318

CUSTOMER # VEP-40470039

CUSTOMER PO# 4500777456

Date Due: 08-20-11

Please include Customer # on check made payable to MDEC

DESCRIPTION	QTY	UNIT	PRICE	EXT-PRICE
JUNE 2011 / W. MCKERCHER - DIVISION 4047	2	STAFF HOUR (S)	100.00	\$200.00
			TOTAL AMOUNT DUE	\$200.00

ACCOUNTS RECEIVABLE / FEES

POST OFFICE BOX 2339 • JACKSON, MISSISSIPPI 39225-2339 • TEL: (601) 961-5572 • FAX: (601) 961-5510 • Email: accounts_receivable@deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

DATE: 07/11/2011

Hercules Incorporated
50 E. RiverCenter Blvd.
Covington KY 41012

64-79/611
CHECK NO. 20002953

PAY EXACTLY *

300 USD AND 00/100

AMOUNT
USD *****300.00*

VOID AFTER 180 DAYS

PAY TO THE ORDER OF
MISSISSIPPI DEPT OF ENVIRONMENTAL
QLTY
PO Box 2339
JACKSON MS 39225-2339

BY
Lynn P. Trueman

SunTrust Bk, ATLANTA, GA

SECURITY FEATURES INCLUDED, DETAILS ON BACK.

⑈ 20002953⑈ ⑆061100790⑆ [REDACTED]

Vendor No. 2067579	Hercules Incorporated			Check No. 20002953
REFERENCE NUMBER	INVOICE AMOUNT	DISCOUNT AMT	NET AMOUNT	
Hercules Incorporated				
VEP00004285 *UNCONT SITES VOL EVAL INV DATED 2/18/11	300.00	0.00	300.00	
Sum total	300.00	0.00	300.00	

40470039

RECEIVED
JUL 13 2011
MS DEPT OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE

DATE: 07/01/2011

Hercules Incorporated
50 E. RiverCenter Blvd.
Covington KY 41012

64-79/611
CHECK NO. 20002892

PAY EXACTLY *

AMOUNT

300 USD AND 00/100

USD *****300.00*

VOID AFTER 180 DAYS

PAY TO THE ORDER OF MISSISSIPPI DEPT OF ENVIRONMENTAL
QLTY
PO Box 2339
JACKSON MS 39225-2339

BY *Lynn P. Truma*

SunTrust Bk, ATLANTA, GA

SECURITY FEATURES INCLUDED, DETAILS ON BACK.

⑈ 2000 289 2⑈ ⑆06 1 100 790⑆

Vendor No. 2067579	Hercules Incorporated			Check No. 20002892
REFERENCE NUMBER	INVOICE AMOUNT	DISCOUNT AMT	NET AMOUNT	
Hercules Incorporated				
VEP00004430 *Uncontrolled Sites Voluntary Evaluation Program	300.00	0.00	300.00	
Sum total	300.00	0.00	300.00	

Invoice Dated: 06/17/2011

DATE: 07/22/2011

Hercules Incorporated
50 E. RiverCenter Blvd.
Covington KY 41012

64-79/611
CHECK NO. 20003092

PAY EXACTLY *

3,000 USD AND 00/100

AMOUNT
USD *****3,000.00*
VOID AFTER 180 DAYS

PAY TO THE ORDER OF MISSISSIPPI DEPT OF ENVIRONMENTAL
QLTY
PO Box 2339
JACKSON MS 39225-2339

BY *Lynn P. Truma*

SunTrust Bk, ATLANTA, GA

SECURITY FEATURES INCLUDED. DETAILS ON BACK.

⑈ 20003092⑈ ⑆061100790⑆

Vendor No. 2067579	Hercules Incorporated		Check No. 20003092
REFERENCE NUMBER	INVOICE AMOUNT	DISCOUNT AMT	NET AMOUNT
Hercules Incorporated			
VE000004360 *UNCONT SITES VOL EVAL INV DATED 4/18/11	200.00	0.00	200.00
VEP00004182 *UNCONT SITES VOL EVAL INV DATED 11/16/2010	1,000.00	0.00	1,000.00
VEP00004248 *UNCONT SITES VOL EVAL INV DATED 1/13/2011	1,550.00	0.00	1,550.00
VEP00004320 *UNCONT SITES VOL EVAL INV DATED 3/22/11	200.00	0.00	200.00
VEP00004394 *UNCONT SITES VOL EVAL INV DATED 5/17/11	50.00	0.00	50.00
Sum total	3,000.00	0.00	3,000.00

RECEIVED
JUL 28 2011
MISSISSIPPI DEPT OF ENVIRONMENTAL QUALITY

Fw: Extension Request

Melissa Collier to: Willie McKercher, Rick Sumrall

06/24/2011 02:15 PM

From: Melissa Collier/OPC/DEQ
To: "Willie McKercher" <Willie_McKercher@deq.state.ms.us>, "Rick Sumrall" <Rick_Sumrall@deq.state.ms.us>

Melissa McGee-Collier, Director Office of Community Engagement

This message was sent from Blackberry # 769-798-3918

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

From: Pallas.Jeff
Sent: 06/24/2011 03:02 PM AST
To: gary.rikard@butlersnow.com; tdhassett@ashland.com;
John.Ellis@arcadis-us.com; Chris Sanders
Cc: Knight.Karen@epamail.epa.gov; Anderson.Meredith@epamail.epa.gov; Jeff Pallas <pallas.jeff@epa.gov>; Melissa Collier
Subject: Extension Request

The EPA is in receipt of Hercules' June 15, 2011, request for additional time to submit the work plans required by the May 9, 2011, RCRA Section 3013 Administrative Order. Pursuant to this request, and subsequent discussions between Meredith Anderson and Tim Hassett, the EPA hereby agrees to the following extensions:

Draft Phase I Sampling and Analysis Work Plan -- due July 15, 2011
Draft Phase II Sampling and Analysis Work Plan -- due September 12, 2011

Please consider this a formal modification to the May 9, 2011, 3013 Administrative Order.

If you have any questions, feel free to contact Meredith Anderson at (404) 562-8608. Legal inquiries should be directed to Colleen Michuda at 505-562-9486. You can also contact me at the number below.

Jeffrey T. Pallas
Acting Deputy Director
RCRA Division

(404) 562-8569
pallas.jeff@epa.gov



Confirmation of Notification- Site 40470039 RUAO

Rodney S. Bolton to: Willie_McKercher

Cc: "Kara Long", "Charles S. Jordan"

06/17/2011 01:04 PM

From: "Rodney S. Bolton" <rsbolton@ashland.com>
To: Willie_McKercher@deq.state.ms.us
Cc: "Kara Long" <KLong@ashland.com>, "Charles S. Jordan" <csjordan@ashland.com>

Mr. McKercher:

I am sending this follow-up email to our 6/17/11 phone call with Mr. Tony Russell. Charlie Jordan called Mr. Russell to inform him that our neighbor to the west, Zeon Chemical, derailed a tank car while crossing a roadway within the Hercules plant site. As a result of the derail, the track, ties, etc will have to be removed and replaced in order to repair this road crossing. Mr Russell agreed we could proceed with repairing the track crossing. We are submitting this in accordance with the site 40470039 RUAO.

Please contact me if you need additional information. Thank you.

Regards,

Rod Bolton
Ashland Hercules Water Technologies
Regional Plant Manager
414-535-6205
Cell: 414-331-0708

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Hercules request for Extension

Melissa Collier to: Rick Sumrall, Chris Wells, Chris Sanders,
Willie McKercher

06/16/2011 01:57 PM

Cc: Gloria Tatum, Trudy Fisher

From: Melissa Collier/OPC/DEQ

To: Rick Sumrall/ECED/OPC/DEQ@DEQ, Chris Wells/OPC/DEQ@DEQ, Chris
Sanders/GW/OPC/DEQ@DEQ, Willie McKercher/HW/OPC/DEQ@DEQ

Cc: Gloria Tatum/FS/OPC/DEQ@DEQ, Trudy Fisher/Admin/DEQ@DEQ

History: This message has been replied to.

EPA has granted an extension for 21 days instead of the requested 45.

That makes the workplan for Phase I due on July 11 and the workplan for Phase II due on Sept. 12.

Melissa McGee-Collier
Mississippi Department of Environmental Quality
Office of Community Engagement

Mailing Address
PO Box 2261
Jackson, MS 39225

Physical Address
515 East Amite Street
Jackson, MS 39201

Work Phone: 601-961-5025
Work Cell: 769-798-3918



Hercules Incorporated
Hercules Research Center
500 Hercules Road
Wilmington, DE 19808-1599
Writer's Direct Dial: 302-995-3456

June 15, 2011

VIA ELECTRONIC AND OVERNIGHT MAIL

Ms. Colleen Michuda
Office of RCRA, OPA and UST Legal Support
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

**Subject: Extension Request Pertaining to the May 9, 2011 "Administrative Order under Section 3013(a) of RCRA", Hercules Inc. Hattiesburg Facility, Hattiesburg, Forrest County, Mississippi
USEPA ID No. MSD 008 182 081/Docket No. RCRA-04-2011-4251**

Dear Ms. Michuda:

Hercules Incorporated (Hercules) received the above referenced Resource Conservation Recovery Act (RCRA) Administrative Order (Order) from the U.S. Environmental Protection Agency (USEPA) on May 10, 2011. The letter indicates that Hercules' initial response to USEPA's comment to provide a Phase I Sampling and Analysis Work Plan (SAWP) is required by June 18, 2011. Hercules has initiated preparation of the Phase I SAWP, including meeting with the USEPA on Thursday June 9, 2011 to discuss the SAWP; however, as discussed at the meeting, due to the effort that will be required to develop the response, Hercules respectfully requests a 45-day extension for the Phase I SAWP submission to be due on August 2, 2011. Specifically, a more robust conceptual site model will be developed, surrounding land use data will be incorporated into the work plan, and a systematic sampling approach and enhanced agency interaction for the various media will be developed.

In addition to the Phase I SAWP, a Phase II SAWP is required to be submitted to USEPA by August 17, 2011. Data obtained from the implementation of the Phase I SAWP will be incorporated into the development of the Phase II SAWP. Because the development of the Phase II SAWP is critically linked to the implementation of the Phase I SAWP, Hercules respectfully requests that the response due date for the Phase II SAWP be extended to 60 days after USEPA approves the Phase I SAWP.

If there are any questions concerning this request, please contact either Mr. Tim Hassett at (302) 995-3456 or Ms. Tina Woods at (480) 419-3365.

Sincerely,

Timothy D. Hassett
Project Coordinator

TDH/cep

cc: Meredith C. Anderson – EPA Region IV, Atlanta, GA
Javier E. Garcia – EPA Region IV, Atlanta, GA
Chris Sanders – MDEQ, Jackson, MS
Bruce J. Hough, Ashland/ Hercules, Wilmington, DE
Rodney Bolton, Ashland/ Hercules, Milwaukee, WI
John Ellis – ARCADIS/ Baton Rouge, LA



Hercules plant up for contamination testing

Posted: May 18, 2011 6:18 PM CDT

Updated: May 18, 2011 6:18 PM CDT

By Kelly Bryant, Weathercaster - email

Hattiesburg, MS - (WDAM) News that the Hercules plant in Hattiesburg is under investigation by the Mississippi Department of Environmental Quality is not a surprise to some. Elma Dennis has lived in Vickers Circle for six years and said, "This is a very contaminated piece of soil out here."



The plant is currently regulated by MDEQ, but the regulations they follow don't cover everything. For instance, after testing groundwater at the facility, the research found the soil contaminated with chemicals. Mrs. Dennis said she believes her soil is contaminated, and it's causing negative effects not only on her garden, but on her health. She said, "It will cause your head to itch, your skin, on my legs, the itching will get so severe and it will last for some time."

Mrs. Dennis says that after talking with neighbors who had the same opinions, she went to the housing authority. But nothing's been done about it, yet. The MDEQ released information regarding upcoming testing of the plant and the surrounding area for something called VOC's or Volatile Organic Compounds, some of which may cause cancer in humans.

Phase I will test the site for human exposure, while Phase II of testing will assess the extent of the contamination.

The upcoming tests will go further in depth than previous studies on soil, sludge, surface water, sediment, and groundwater on the site. Those studies indicated that hazardous chemicals, primarily VOC's like benzene, chlorobenzene, carbon tetrachloride, and methylene chloride are present. Dennis thinks this is killing her garden.

"It smelled like something was dead, there. I bought soil and put it here to try to have a flower garden. It has now, I guess, killed the usefulness of the soil, and it won't even let the flowers grow as they normally do."

The phases of testing are due in the next couple months, and people living near the plant will be asked to sign an Access Agreement, granting researchers permission to study in their neighborhoods. But for now, Mrs. Dennis thinks the testing and possible treatment is too little, too late.

She said, "I don't even think they can fix it now, it's too late for that."

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Hercules testing ordered by EPA

Written by

Terry L. Jones

American Staff Writer

tjones@hattiesburgamerican.com

11:12 PM, May. 13, 2011|

Residents in the Mobile-Bouie neighborhood and North Main Historic District are finally going to get the answers they've waited a decade for regarding possible contamination at the Hercules plant, which closed in 2009.

During a meeting with representatives from the Mississippi Department of Environmental Quality and U.S. Environmental Protection Agency on Thursday, the concerned citizens were informed that Ashland Inc. - the company that purchased Hercules in 2008 - was issued an order to conduct on- and off-site testing as soon as possible after several harmful contaminants were uncovered at the facility.

In the EPA order, dated May 10, large amounts of benzene (and several other hazardous materials) were discovered in groundwater, soil samples and sediment that was tested by the department earlier this year.

According to the EPA, benzene is a volatile organic compound that acute exposure to

can adversely affect the central nervous system and cause dizziness, headaches and a string of other complications.

Chronic exposure can even cause leukemia, according to the EPA.

Residents in the area say, besides procuring samples at the Hercules site, experts also will be testing adjoining properties within a half-mile radius of the plant.

"We feel it should be much farther than that," said Melvin Williams, president of the Mobile-Bouie Neighborhood Association. "All the drainage from Hercules has come through our community since it's been in business."

Representatives from MDEQ and EPA did not return calls Friday for comment.

Opening in 1923, Hercules manufactured myriad products that included modified resins, synthetic rubber and agricultural pesticide.

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The facility closed in December 2009 due to the economic recession, officials said.

Williams said residents at Thursday's meeting felt more at ease because the EPA would be overseeing the entire operation.

"The EPA has more power when it comes to fines and remediation of any contamination," he said.

In a letter to Ashland, dated May 9, the EPA threatened legal recourse with the U.S. District Court of Southern Mississippi should the company not comply with its regulations.

In addition to the site testing, the EPA's order requires Hercules' owners to submit a written Phase I Work Plan that includes sampling and analysis of drinking water within a 4-mile radius of the facility, and surface and sediment data of any wetlands, creeks, lakes or ditches located within a half-mile of the plant.

The report also must include soil gas samplings and indoor air reports.

EPA is requiring a Phase II Work Plan 90 days from now that will include "the presence, magnitude, extent, direction, and rate of movement of any hazardous waste" in the area.

"This is the first step of what we hope is a long-term plan to assess what dangerous chemicals are still at Hercules and do something about it," said Keith Long, president of the North Main Historic District Neighborhood Association.

Williams added, "Since the big guns are involved, maybe we will finally get some answers to the questions we've had for years."

Click it

Go to [hattiesburg american.com](http://hattiesburgamerican.com) to see EPA letter sent to Ashland.

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[EPA letter to Ashland-Hercules](#)

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