

**Hercules, Inc.**  
**Administrative Record**  
RCRA Section 3013(a) Order

**Volume 1**

1. United States Environmental Protection Agency (US EPA), "History of Activity Handler Report, for Hercules, Inc.," <<http://rcrainfo.epa.gov>> (April 27, 2011).  
  
US EPA, "RCRA Site Detail, for Hercules, Inc.," <<http://rcrainfo.epa.gov>> (April 27, 2011).
2. Letter from Gary C. Rikard, Butler, Snow, O'Mara, Stephens & Cannada, PLL, to Chris Wells, Mississippi Department of Environmental Quality (MDEQ), "Response to January 12, 2011, Request for Information," (March 9, 2011).
3. Mississippi Secretary of State Business Services, Corporate Record for Hercules, Inc., <<https://business.sos.state.ms.us>> (March 1, 2011).
4. Eco Systems, Inc. for Hercules, Inc., "2nd Semi-Annual Monitoring Report 2010," (February 25, 2011).
5. US EPA, "SESD Final Field Investigation Report for Hercules, Inc.," (January 31, 2011).
6. Letter from Chris Sanders, MDEQ, to Tim Hassett, Hercules, Inc., "Sludge Characterization and Bench Treatability Report dated August 20, 2010," (November 10, 2010).
7. MDEQ, Providence Street Sewer Sample Results, (October 1, 2010).
8. Jackson, Randy, US EPA, " RCRA Case Development Investigation/Evaluation Report," (inspection date of September 28-29, 2010).
9. US EPA, "Regional Screening Level Table," (December 2009).
10. Eco Systems, Inc. for Hercules, Inc., "Groundwater Assessment Report of the Former IB Basin," (November 10, 2009).
11. Letter from Rodney S. Bolton, Ashland Hercules Water Technologies, to Jan Patton, MDEQ, "Re: Notice of Violation Hercules Inc Hattiesburg, Mississippi Forest County NOV Response Follow-up," (June 9, 2009).

**Hercules, Inc.**  
**Administrative Record**  
RCRA Section 3013(a) Order

**Volume 1**

12. Letter from Jan M. Patton, MDEQ, to Rodney Bolton, Hercules, Inc., "Re: Notice of Violation," (November 20, 2008).
13. Letter from Rodney Bolton, Hercules, Inc., to Jerry B. Banks, MDEQ, transmitting "Sludge Sampling Analyses Report," (October 9, 2008).
14. MDEQ, "Notice of Land Use Restrictions," (December 10, 2007).
15. Letter from Walter D. Langhans, Hercules, Inc., to Carla Brown, MDEQ, " Re: Hercules, Inc. Water Ref. No. MSP091286," (October 25, 2005).
16. Groundwater & Environmental Services, Inc. for Hercules, Inc., "Corrective Action Plan Revision 01," (January 20, 2005).
17. Eco Systems, Inc. for Hercules, Inc., "Supplemental Site Investigation Report," (November 7, 2003).

**Hercules, Inc.**  
**Administrative Record**  
RCRA Section 3013(a) Order

**Volume 2**

1. Eco Systems, Inc. for Hercules, Inc., "Site Investigation Report," (April 7, 2003).
2. Eco Systems, Inc. for Hercules, Inc., "Interim Groundwater Monitoring Report," (January 24, 2003).
3. MDEQ, "Tier I TRG Table," (February 28, 2002).
4. Kroske, John, US EPA, "RCRA Inspection Report," (inspection date of August 11, 1999).
5. Letter from Charles Jordan, Hercules, Inc., to Brian Young, MDEQ, transmitting "Installation of Six Monitoring Wells," (July 31, 1997).
6. Letter from Brian Young, MDEQ, to Charles Jordan, Hercules, Inc., "Re: Hercules, Inc. Response to letter dated April 3, 1997," (March 19, 1997).
7. Letter from Russell Smith, MDEQ, to Charles Jordan, Hercules, Inc., "Re: Hercules, Inc. Site Visit on February 18, 1997," (March 5, 1997).
8. Letter from Charles Jordan, Hercules, Inc., to Ken Whitten, MDEQ, transmitting "Installation of Three Temporary Well Points at Hercules," (October 27, 1994).
9. B&V Waste Science and Technology Corp. for Waste Management Division, US EPA, "Site Inspection Report," (April 29, 1993).
10. Hercules, Inc., "General Information, EPA Form 3510-1 (Rev. 10-80)," (March 25, 1991).
11. Letter from Michael Slack, Mississippi Bureau of Pollution Control, to Narindar Kumar, US EPA, transmitting "Preliminary Assessment Reassessment Report (PAR) for Hercules, Incorporated Hattiesburg, Mississippi MSD008182081," (December 15, 1989).

**Hercules, Inc.**  
**Administrative Record**  
RCRA Section 3013(a) Order

**Volume 2**

12. Letter from Charles S. Jordan, Hercules, Inc., to John Herrmann, MDEQ, transmitting "Notification of Hazardous Waste Activity, EPA Form 8700-12," (February 18, 1983).
13. "General Information, EPA Form 3510," (November 18, 1980).
14. "Notification of Hazardous Waste Activity, EPA Form 8700-12," (August 15, 1980).

**Hercules, Inc.**  
**Administrative Record**  
RCRA Section 3013(a) Order

**Volume 3**

**1. Arsenic**

World Health Organization (WHO), *Guidelines for Drinking-water Quality*, 3<sup>rd</sup> Edition, Volume 1, pp. 306-308, <[http://www.who.int/water\\_sanitation\\_health/dwq/gdwq3rev/en/](http://www.who.int/water_sanitation_health/dwq/gdwq3rev/en/)> (2008).

Agency for Toxic Substances & Disease Registry (ATSDR), "Arsenic Fact Sheet," *Division of Toxicology and Environmental Medicine ToxFAQs*, <<http://www.atsdr.cdc.gov/tfacts2.pdf>> (August 2007).

Kapaj, S., Peterson, H., Liber, K., and Bhattacharya, P., "Human Health Effects From Chronic Arsenic Poisoning - A Review," *Journal of Environmental Science and Health Part A*, 41: 2399-2428, (2006).

Saha, J. C., Dikshit, A. K., Bandyopadhyay, M., and Saha, K. C., "A Review of Arsenic Poisoning and its Effects on Human Health," *Critical Reviews in Environmental Science and Technology*, 29(3), 281-313, (1999).

**2. Benzene**

WHO, *Guidelines for Drinking-water Quality*, 3<sup>rd</sup> Edition, Volume 1, pp. 312-313, <[http://www.who.int/water\\_sanitation\\_health/dwq/gdwq3rev/en/](http://www.who.int/water_sanitation_health/dwq/gdwq3rev/en/)> (2008).

ATSDR, "Toxicological Profile for Benzene," *U.S. Department of Health and Human Services*, <<http://www.atsdr.cdc.gov/ToxProfiles/tp3.pdf>> (August 2007).

Ahmed, F. E., "Toxicology and Human Health Effects Following Exposure to Oxygenated or Reformulated Gasoline," *Toxicology Letters*, 123, pp. 89-113, (2001).

# Hercules, Inc.

## Administrative Record RCRA Section 3013(a) Order

### Volume 3

#### 3. Carbon Tetrachloride

WHO, *Guidelines for Drinking-water Quality*, 3<sup>rd</sup> Edition, Volume 1, pp. 320-321, <[http://www.who.int/water\\_sanitation\\_health/dwq/gdwq3rev/en/](http://www.who.int/water_sanitation_health/dwq/gdwq3rev/en/)> (2008).

ATSDR, "Carbon Tetrachloride Fact Sheet," *Division of Toxicology ToxFAQs*, <<http://www.atsdr.cdc.gov/tfacts30.pdf>> (August 2005).

Vrijheid, M., "Health Effects of Residence Near Hazardous Waste Landfill Sites: A Review of Epidemiologic Literature," *Environmental Health Perspectives*, 108(1), pp. 101-112, (March 2000)

#### 4. Chlorobenzene

ATSDR, "Toxicological Profile for Chlorobenzene," *U.S. Public Health Service*, <<http://www.atsdr.cdc.gov/ToxProfiles/tp30.pdf>> (December 1990).

#### 5. Chloroform

National Toxicology Program, "Chloroform," *Eleventh Report on Carcinogens*, <<http://ntp.niehs.nih.gov/ntp/roc/eleventh/profiles/s038chlo.pdf>> (2002).

ATSDR, "Toxicological Profile for Chloroform," *U.S. Department of Health and Human Services*, <<http://www.atsdr.cdc.gov/ToxProfiles/tp6.pdf>> (September 1997).

#### 6. 1,2-Dichloroethane

WHO, *Guidelines for Drinking-water Quality*, 3<sup>rd</sup> Edition, Volume 1, pp. 353-354, <[http://www.who.int/water\\_sanitation\\_health/dwq/gdwq3rev/en/](http://www.who.int/water_sanitation_health/dwq/gdwq3rev/en/)> (2008).

ATSDR, "1,2-Dichloroethane Fact Sheet," *Division of Toxicology ToxFAQs*, <<http://www.atsdr.cdc.gov/tfacts38.pdf>> (September 2001).

# Hercules, Inc.

## Administrative Record RCRA Section 3013(a) Order

### Volume 3

#### 7. Ethylbenzene

WHO, *Guidelines for Drinking-water Quality*, 3<sup>rd</sup> Edition, Volume 1, pp. 372-373, <[http://www.who.int/water\\_sanitation\\_health/dwq/gdwq3rev/en/](http://www.who.int/water_sanitation_health/dwq/gdwq3rev/en/)> (2008).

ATSDR, "Ethylbenzene Fact Sheet," *Division of Toxicology and Environmental Medicine ToxFAQs*, <<http://www.atsdr.cdc.gov/tfacts110.pdf>> (September 2007).

ATSDR, "Toxicological Profile for Ethylbenzene," *U.S. Department of Health and Human Services*, <<http://www.atsdr.cdc.gov/ToxProfiles/tp110.pdf>> (November 2010).

#### 8. Methylene Chloride (Chloromethane)

ATSDR, "Methylene Chloride Fact Sheet," *Division of Toxicology ToxFAQs*, <<http://www.atsdr.cdc.gov/tfacts14.pdf>> (February 2001).

ATSDR, "Toxicological Profile for Methylene Chloride," *U.S. Department of Health and Human Services*, <<http://www.atsdr.cdc.gov/ToxProfiles/tp14.pdf>> (September 2000).

#### 9. Naphthalene

ATSDR, "Toxicological Profile for Naphthalene, 1-Methylnaphthalene, and 2-Methylnaphthalene," *U.S. Department of Health and Human Services*, <<http://www.atsdr.cdc.gov/ToxProfiles/tp67.pdf>> (August 2005).

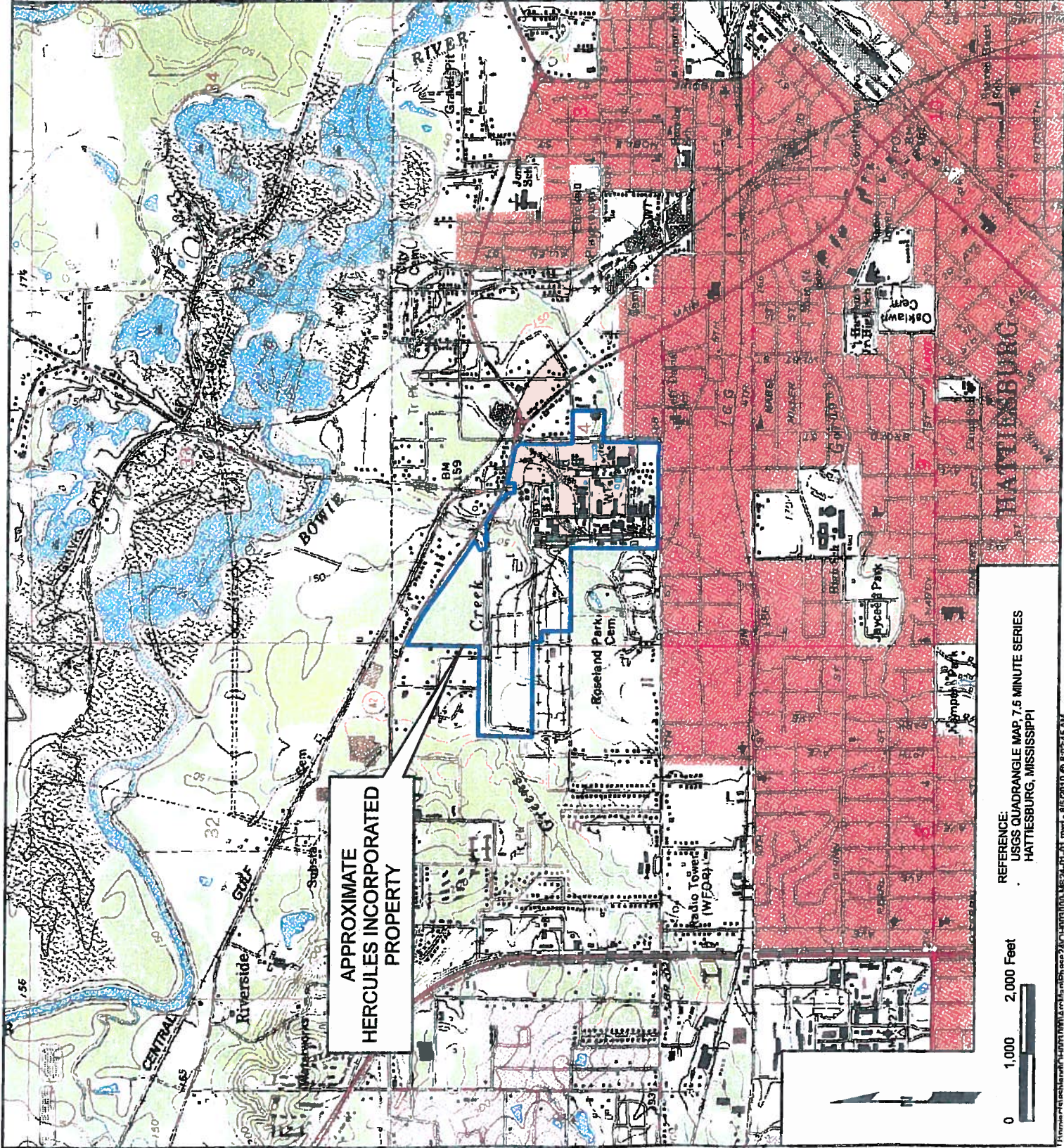
#### 10. Toluene

WHO, *Guidelines for Drinking-water Quality*, 3<sup>rd</sup> Edition, Volume 1, pp. 443-444, <[http://www.who.int/water\\_sanitation\\_health/dwq/gdwq3rev/en/](http://www.who.int/water_sanitation_health/dwq/gdwq3rev/en/)> (2008).

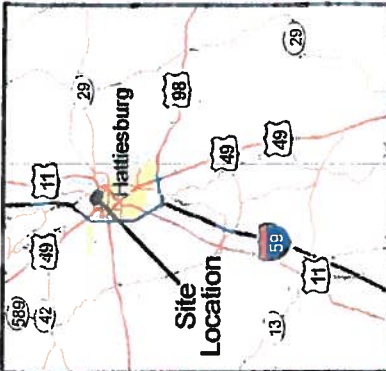
National Highway Traffic Safety Administration, "Toluene," *Drugs and Human Performance Fact Sheets*, pp. 85-89, (April 2004).

US EPA, "Toxicological Review of Toluene," *In Support of Summary Information on the Integrated Risk Information System (IRIS)*, <<http://www.epa.gov/iris/toxreviews/0118tr.pdf>> (September 2005).





**APPROXIMATE  
HERCULES INCORPORATED  
PROPERTY**



**SITE LOCATION MAP**

INVESTIGATION AREA  
HERCULES INCORPORATED  
Hattiesburg, Mississippi

**ARCADIS**  
10352 PLAZA AMERICANA DRIVE  
BATON ROUGE, LA 70816  
TEL: 225-282-1004  
FAX: 225-218-9577  
WWW.ARCADIS-US.COM

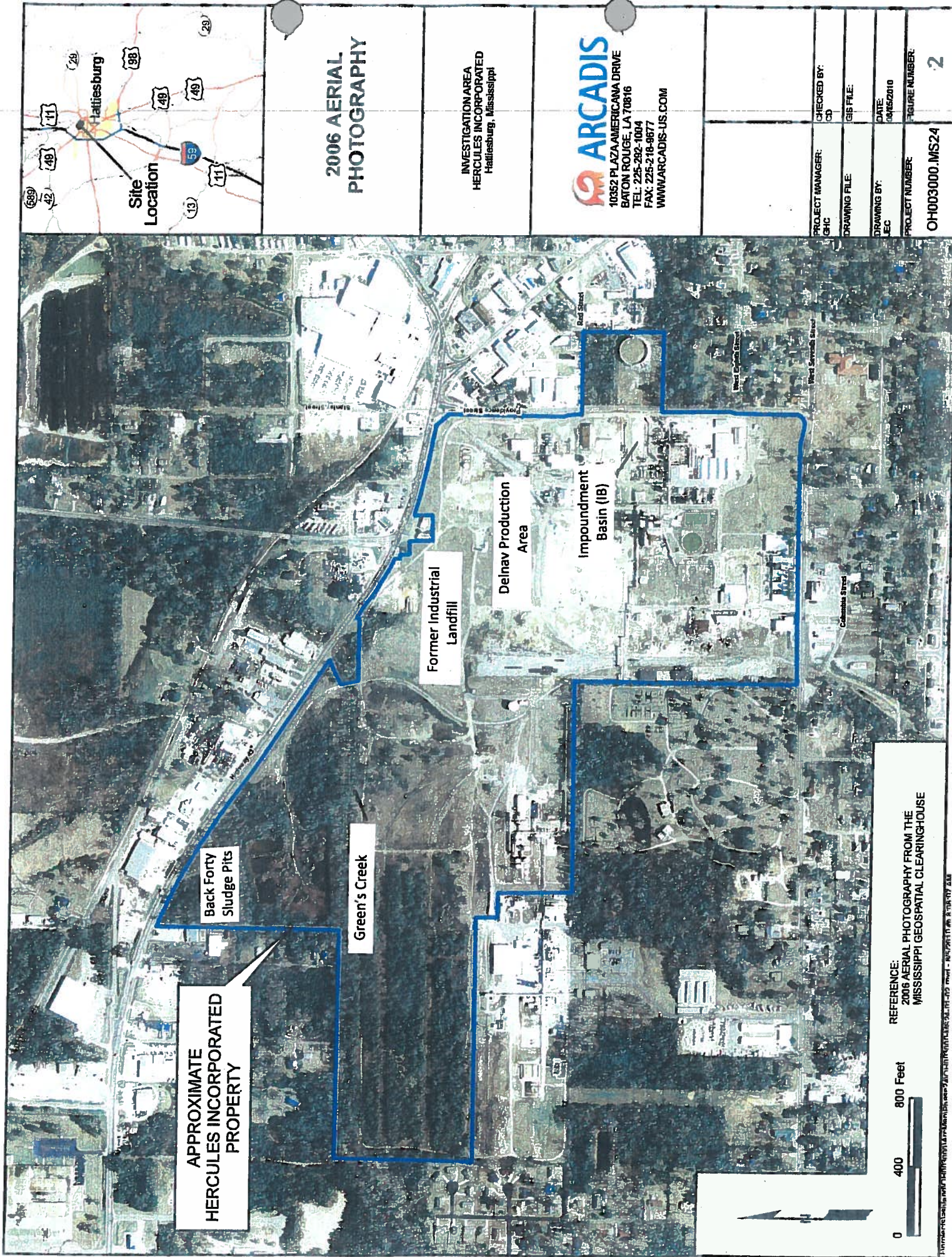
PROJECT MANAGER: GHC	CHECKED BY: CD
DRAWING FILE:	GIS FILE:
DRAWING BY: JEC	DATE: 08/25/2010
PROJECT NUMBER: OH003000.MS24	FIGURE NUMBER: 1

REFERENCE:  
USGS QUADRANGLE MAP, 7.5 MINUTE SERIES  
HATTIESBURG, MISSISSIPPI



\\hrcad\hrcad\proj\1003000\1003000.dwg (8/25/2010 10:48:24 AM) PLOT: 8/25/2010 10:48:24 AM









UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

ATLANTA FEDERAL CENTER  
31 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

APR 23 2010

**MEMORANDUM**

**SUBJECT:** Region 4 Data Management and Electronic Data Deliverables (EDDs)

**FROM:** Franklin E. Hill  
Superfund Division Director

**TO:** Superfund Division

**Introduction**

As information technology advancements continue, the ability to receive, store, and use electronic data from a variety of sources becomes a critical aspect of EPA's work. EPA has the need to receive and use environmental data in an electronic format. In an effort to streamline the electronic submittal of various environmental sampling data, EPA Region 4 has adopted a standardized electronic data deliverable (EDD) format. Using a Regional EDD format allows for efficient and cost-effective exchange of site data with contractors, and Federal and State agencies.

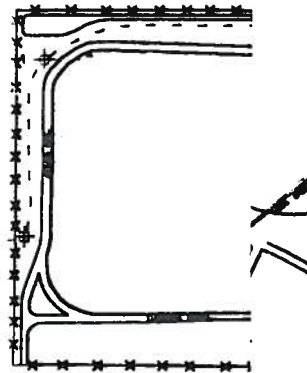
The EPA Region 4 standard format for EDDs include quality controls to minimize potential data errors so that the data can be appropriately analyzed and utilized for decision making. The data is electronically archived for ready access as needed. As different contractors, consultants, and agencies are involved in various stages of a Superfund project, there are significant cost savings in having the site-related data readily available. The uniform EDD approach does more than cut site management costs. It provides better and more reliable stewardship of Superfund data, and when integrated with other information such as GIS, it helps ensure transparent decision making.

**Data Management and Electronic Data Deliverables**

When conducting Superfund work in Region 4, the party submitting data will provide an electronic submittal of data in accordance with Region 4 policies, guidelines, and formats. The Region 4 EDD is a standardized format required by the Field Branches Quality System and Technical Procedures, Environmental Data Submission Guidance, SESD-106-R0 (or most recent version). The Field Branches Quality System and Technical Procedures supersede the "Environmental Investigations Standard Operating Procedures and Quality Assurance Manual" (EISOPQAM), November 2001, and the "Ecological Assessment Standard Operating Procedures and Quality Assurance Manual" (EASOPQAM), January 2002. The methods described in this document are to be used by all data providers when preparing and submitting environmental data electronically to Region 4, regardless of the originating program.

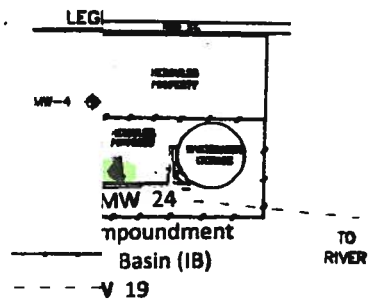


RESIDENTIAL



RESIDENTIAL/COMMERCIAL

2



**NOTES**

- 1. BASE MA



HERCULES INCORPORATED  
HATTIESBURG, MISSISSIPPI

SITE MAP



**RE: Hercules - Dioxathion/Dioxenethion Sampling**  
Derouen, Craig to: Willie\_McKercher@deq.state.ms.us

04/27/2011 03:34 PM

From: "Derouen, Craig" <Craig.Derouen@arcadis-us.com>  
To: "Willie\_McKercher@deq.state.ms.us" <Willie\_McKercher@deq.state.ms.us>

Thanks.

Craig Derouen, P.E. | Senior Engineer | craig.derouen@arcadis-us.com  
ARCADIS U.S., Inc. | 10352 Plaza Americana Drive | Baton Rouge, LA 70816  
T. 225.292.1004 | M. 225.802.7005 | F. 225.218.9677  
www.arcadis-us.com

Professional Registration/LA  
ARCADIS, Imagine the result  
Please consider the environment before printing this email.

From: Willie\_McKercher@deq.state.ms.us [mailto:Willie\_McKercher@deq.state.ms.us]  
Sent: Wednesday, April 27, 2011 3:13 PM  
To: Derouen, Craig  
Cc: Ellis, John; tdhassett@ashland.com  
Subject: RE: Hercules - Dioxathion/Dioxenethion Sampling

Concur. Sampling for Dioxathion/Dioxenethion will now occur in November 2011 and annually thereafter.

-----  
Willie McKercher, P.E.  
Assessment and Remediation II  
Mississippi Department of Environmental Quality  
Phone: (601) 961-5731  
Fax: (601) 961-5300  
Willie\_McKercher@deq.state.ms.us  
-----

-----"Derouen, Craig" <Craig.Derouen@arcadis-us.com> wrote: -----  
To: "Willie\_McKercher@deq.state.ms.us" <Willie\_McKercher@deq.state.ms.us>  
From: "Derouen, Craig" <Craig.Derouen@arcadis-us.com>  
Date: 04/27/2011 02:54PM  
Cc: Timothy D Hassett <tdhassett@ashland.com>, "Ellis, John" <John.Ellis@arcadis-us.com>  
Subject: RE: Hercules - Dioxathion/Dioxenethion Sampling

Willie,

To document which wells will not be sampled for Dioxathion/Dioxenethion in May 2011 at the Hercules facility in Hattiesburg, MS, I've listed them below. Please let me know if you concur with this list:

CM-00  
CM-01  
CM-02  
CM-03



CM-04  
CM-05  
MW-02  
MW-03  
MW-04  
MW-05  
MW-06  
MW-07  
MW-08  
MW-09  
MW-10  
MW-11  
MW-12  
MW-13  
MW-14  
MW-15  
MW-16  
MW-17  
MW-18  
MW-19  
MW-20  
MW-21  
MW-22  
MW-23  
MW-24

Thanks,

Craig Derouen, P.E. | Senior Engineer | craig.derouen@arcadis-us.com  
ARCADIS U.S., Inc. | 10352 Plaza Americana Drive | Baton Rouge, LA 70816  
T. 225.292.1004 | M. 225.802.7005 | F. 225.218.9677  
www.arcadis-us.com  
Professional Registration/LA  
ARCADIS, Imagine the result  
Please consider the environment before printing this email.

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

From: Willie\_McKercher@deq.state.ms.us [  
mailto:Willie\_McKercher@deq.state.ms.us]  
Sent: Thursday, April 21, 2011 1:49 PM  
To: Derouen, Craig  
Subject: Re: Hercules - Dioxathion/Dioxenethion Sampling

That is correct. The schedule was originally set as annually in May for consistency, but the shift in sampling to the fall event should not be an issue. Hercules just needs to ensure that they now continue to sample during the fall event each year.

-----  
Willie McKercher, P.E.  
Assessment and Remediation II  
Mississippi Department of Environmental Quality  
Phone: (601) 961-5731  
Fax: (601) 961-5300  
Willie\_McKercher@deq.state.ms.us  
-----

From: "Derouen, Craig" <Craig.Derouen@arcadis-us.com>  
To: "Willie\_McKercher@deq.state.ms.us"

<Willie\_McKercher@deq.state.ms.us>

Cc: "Ellis, John" <John.Ellis@arcadis-us.com>  
Date: 04/21/2011 01:27 PM  
Subject: Hercules - Dioxathion/Dioxenethion Sampling

Willie,

Got your voicemail message today. I just want to document that I understood it correctly. Because Hercules sampled for Dioxathion/Dioxenethion at the end of 2010, they do not have to sample for those compounds in May 2011. The next time they have to sample for Dioxathion/Dioxenethion will be in the 2nd half of 2011.

Thanks,  
Craig Derouen, P.E. | Senior Engineer | craig.derouen@arcadis-us.com  
ARCADIS U.S., Inc. | 10352 Plaza Americana Drive | Baton Rouge, LA 70816  
T. 225.292.1004 | M. 225.802.7005 | F. 225.218.9677  
www.arcadis-us.com  
Professional Registration/LA  
ARCADIS, Imagine the result  
Please consider the environment before printing this email.

NOTICE: This e-mail and any files transmitted with it are the property of ARCADIS U.S., Inc. and its affiliates. All rights, including without limitation copyright, are reserved. The proprietary information contained in this e-mail message, and any files transmitted with it, is intended for the use of the recipient(s) named above. If the reader of this e-mail is not the intended recipient, you are hereby notified that you have received this e-mail in error and that any review, distribution or copying of this e-mail or any files transmitted with it is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete the original message and any files transmitted. The unauthorized use of this e-mail or any files transmitted with it is prohibited and disclaimed by ARCADIS U.S., Inc. and its affiliates. Nothing herein is intended to constitute the offering or performance of services where otherwise restricted by law.

NOTICE: This e-mail and any files transmitted with it are the property of ARCADIS U.S., Inc. and its affiliates. All rights, including without limitation copyright, are reserved. The proprietary information contained in this e-mail message, and any files transmitted with it, is intended for the use of the recipient(s) named above. If the reader of this e-mail is not the intended recipient, you are hereby notified that you have received this e-mail in error and that any review, distribution or copying of this e-mail or any files transmitted with it is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete the original message and any files transmitted. The unauthorized use of this e-mail or any files transmitted with it is prohibited and disclaimed by ARCADIS U.S., Inc. and its affiliates. Nothing herein is intended to constitute the offering or performance of services where otherwise restricted by law.